

**BEFORE THE HEARING EXAMINER  
FOR KING COUNTY**

TO: OFFICE OF THE KING COUNTY HEARING EXAMINER

AND TO: Appellant City of Algona and its Attorneys of Record

In response to the Prehearing Order, King County sets forth its preliminary list of anticipated lay and expert witnesses. As the nature of the issues and the specific arguments and points contemplated by the appellant on each issue is not yet known with any certainty, the following list is preliminary in nature and will be supplemented as additional information on the appeal issues become available and as additional witnesses are identified.

#### A. Preliminary Lay Witnesses.

1. **Pat McLaughlin**, Director, Solid Waste Division, King County Department of Natural Resources and Parks – Mr. McLaughlin’s areas of expected testimony include the Solid Waste Transfer and Waste Management Plan (“Transfer Plan”), project need, project development, site selection and the EIS process. Mr. McLaughlin is expected to briefly describe the King County regional solid waste system and the role that the South County Recycling and

1 Transfer Station (“SCRTS”) will play in that system. Mr. McLaughlin is also expected to  
2 describe the scope of the regional siting process for the SCRTS siting process. Mr. McLaughlin  
3 may also describe the actions taken to develop a specific SCRTS proposal, which was then  
4 evaluated in the EIS. Mr. McLaughlin is expected to describe the efforts made to work with and  
5 assist jurisdictions in the SCRTS service area in their participation and review of the SCRTS  
6 proposal.

7       2.     **Kevin Kiernan**, Asst. Director, Solid Waste Division, King County Department  
8 of Natural Resources and Parks – Mr. Kiernan’s areas of expected testimony include the Transfer  
9 Plan, project need, project development, site selection and the EIS process. Mr. Kiernan is  
10 expected to briefly describe the King County regional solid waste system and the role that the  
11 SCRTS will play in that system. Mr. Kiernan is also expected to describe the scope of the  
12 regional siting process for the SCRTS siting process. Mr. Kiernan may also describe the actions  
13 taken to develop a specific SCRTS proposal, which was then evaluated in the EIS. Mr. Kiernan  
14 is expected to describe the efforts made to work with and assist jurisdictions in the SCRTS  
15 service area in their participation and review of the SCRTS proposal.

16       3.     **Beth Humphreys**, Project/Program Manager III, Solid Waste Division King  
17 County Department of Natural Resources and Parks – Ms. Humphreys is expected to describe  
18 the steps taken by King County from adoption of the Transfer Plan to issuance of the SCRTS  
19 EIS. Her testimony is expected to include an overview of the policy criteria application process  
20 used to develop the SCRTS proposal and identification of appropriate sites for the SCRTS. Ms.  
21 Humphreys may also testify concerning the Transfer Plan, the need for the SCRTS, the  
22 development of the SCRTS project proposal, site selection and the EIS process. Ms. Humphreys  
23 may also testify regarding the King County regional solid waste system and the role that the

1 SCRTS will play in that system. Ms. Humphreys may also summarize actions taken by the Solid  
2 Waste Division staff to collect data and public input as part of the SCRTS siting and EIS process.  
3 She may outline actions taken by King County to involve stakeholders and the public before and  
4 throughout the EIS process. She is expected to describe the efforts taken to fully evaluate and  
5 respond to comments made on the draft EIS.

6       4. **Eric Richardt**, Engineer III, Solid Waste Division, King County Department of  
7 Natural Resources and Parks – Mr. Richardt is expected to describe the steps taken by King  
8 County from adoption of the Transfer Plan to issuance of the SCRTS EIS. His testimony is  
9 expected to include an overview of the policy criteria application process used to develop the  
10 SCRTS proposal and identification of appropriate sites for the SCRTS facilities. Mr. Richardt  
11 may also summarize actions taken by the Solid Waste Division staff to collect data and public  
12 input as part of the SCRTS siting and EIS process. He is also expected to address the technical  
13 features and the potential footprint of the proposed facility used for the siting process and EIS for  
14 the SCRTS project. He may outline actions taken by King County to involve stakeholders and  
15 the public before and throughout the EIS process. He is expected to describe the efforts taken to  
16 fully evaluate and respond to comments made on the draft EIS.

17       5. **Julie Blakeslee**, formerly with AECOM, now with University of WA, and her  
18 successors **Mike Usen, AICP, Senior Planner**, AECOM and **Katy Chaney, Senior**  
19 **Environmental Planner and Vice President**, AECOM - Lead EIS Consultants. One or more  
20 of these witnesses are expected to outline the systematic steps taken by King County to develop a  
21 SCRTS siting process, including the preparation of the FEIS. One or more of these witnesses are  
22 expected to describe the staffing and approach utilized in the EIS process to evaluate significant  
23 project impacts and identify mitigation. One or more of these witnesses are expected to describe

1 the inter-disciplinary professional team assembled by King County to ensure a thorough EIS  
2 evaluation of project impacts and mitigation. One or more of these witnesses are also expected to  
3 address how the team members, selected for their experience in a wide variety of environmental  
4 projects, adequately described and evaluated likely project impacts and developed appropriate  
5 mitigation measures. One or more of these witnesses are also expected to explain the staffing and  
6 steps used to address the issues associated with the EIS, and the steps taken to address the DEIS  
7 comments and finalize the FEIS.

8       6.     **Tom Creegan**, Engineer III, Solid Waste Division, King County Department of  
9 Natural Resources and Parks - Mr. Creegan is expected to testify to issues associated with the  
10 design, engineering, and impacts associated with the proposed SCRTS site. He is also expected  
11 to address the technical features and the potential footprint of the proposed facility used for the  
12 siting process and EIS for the SCRTS project. He is also expected to address engineering,  
13 construction and impact analysis and mitigation measures associated with the project which were  
14 discussed in the EIS. He may address appeal issues related to the SCRTS project, geotechnical  
15 hazards and related adverse impacts, air quality, groundwater impacts, impacts to streams,  
16 impacts to wetlands, cultural resource assessments and impacts to priority habitats and wildlife  
17 species and volume of cut and fill needed for the alternatives. He may also address the more  
18 detailed work associated with the SCRTS predesign and permit application process.

19       7.     **Trevor Cray**, Engineer III, Road Services Division, King County. Mr. Cray may  
20 testify concerning the work he performed for the SCRTS EIS, including but not limited to,  
21 topographical and boundary field work and survey.

22       8.     **Doug Walters**, Engineer III, Road Services Division, King County- Mr. Walters  
23 may testify concerning the analyses he performed for the preparation of the EIS regarding

1 groundwater including but not limited to, existing conditions, potential impacts and/or  
2 mitigation.

3 9. **Jim Crawford**, Engineer II, Road Services Division, King County- Mr. Crawford  
4 may testify concerning the analyses he performed for the preparation of the EIS regarding  
5 surface water and/or stormwater management, including but not limited to, existing conditions,  
6 potential impacts and mitigation.

7 10. **Cindy Clark**, Water Quality Planner II, Wastewater Treatment Division, King  
8 County - Ms. Clark may testify concerning the analyses she performed for the preparation of the  
9 EIS regarding surface water and/or stormwater management including, but not limited to,  
10 existing conditions, potential impacts and mitigation.

11 11. **Lindsey Miller**, Capital Project Manager III, Parks and Recreation Division,  
12 King County - Ms. Miller may testify concerning the analyses and field work she performed for  
13 the preparation of the EIS regarding wetlands and vegetation, but not limited to, existing  
14 conditions, potential impacts and mitigation.

15 12. **Jennifer Keune**, Environmental Scientist III, Solid Waste Division, King County  
16 - Ms. Keune may testify concerning the analyses and work she performed for the preparation of  
17 the EIS regarding hazardous materials, including but not limited to, existing conditions, potential  
18 impacts and mitigation.

19 13. **Toni Hartje**, Engineer III, Road Services Division, King County - Ms. Hartje may  
20 testify concerning the analyses and work she performed for the preparation of the EIS regarding  
21 hazardous materials, including but not limited to, existing conditions, potential impacts and  
22 mitigation.

1       14. **Alexander Rist**, Solid Waste Division, King County - Mr. Rist may testify  
2 concerning the analyses and work he performed for the preparation of the EIS regarding solid  
3 waste data, population forecasting and solid waste tonnage data.

4       B. **Preliminary List of Expert Witnesses and Preliminary Summary of Expert Opinion.**

5       1. **W. Martin McCabe, PhD, PE** Senior Engineer, AECOM – Dr. McCabe is  
6 expected to opine that the EIS is adequate under SEPA in the area of earth, including but not  
7 limited to its analysis of impacts to earth resources, the geotechnical engineering methodology  
8 and assessment of geologic impacts associated with the construction and operation of the  
9 SCRTS. Specific areas of testimony will include, but not be limited to, the methodology and  
10 assessment of cut and fill volumes, assessment of indirect and cumulative impacts and the  
11 assessment of geologic impacts associated with the construction and operation of the SCRTS.  
12 Dr. McCabe will address specific issues raised by the appellant, including but not limited to the  
13 allegation that the EIS defers analysis of cut and fill volumes regarding alternative 2. Dr.  
14 McCabe will also respond to any expert testimony offered by appellant on earth issues.

15       2. **Keith O'Connell PE**, Vice President/Project Manager, AECOM - Mr. O'Connell  
16 is expected to opine that the EIS is adequate under SEPA in the area of earth, including but not  
17 limited to its analysis of impacts to earth resources, the geotechnical engineering methodology  
18 and assessment of geologic impacts associated with the construction and operation of the  
19 SCRTS. Specific areas of testimony will include, but not be limited to, the methodology and  
20 assessment of cut and fill volumes, assessment of indirect and cumulative impacts and the  
21 assessment of geologic impacts associated with the construction and operation of the SCRTS.  
22 Mr. O'Connell will address specific issues raised by the appellant, including but not limited to  
23

1 the allegation that the EIS defers analysis of cut and fill volumes regarding alternative 2. Mr.  
2 O'Connell will also respond to any expert testimony offered by appellant on earth issues.

3       **3.       Mark Molinari, PG, LEG, LH, Senior Principal Engineering Geologist**

4       AECOM - Mr. Molinari is expected to opine that the EIS is adequate under SEPA in the area of  
5       earth, including but not limited to its analysis of impacts to earth resources, the geotechnical  
6       engineering methodology and assessment of geologic impacts associated with the construction  
7       and operation of the SCRTS. Specific areas of testimony will include, but not be limited to, the  
8       methodology and assessment of indirect and cumulative impacts and the assessment of geologic  
9       impacts associated with the construction and operation of the SCRTS. Mr. Molinari is also  
10      expected to opine that the EIS is adequate under SEPA in the area of groundwater and hazardous  
11      substances. Mr. Molinari will also address specific issues raised by the appellant, including but  
12      not limited to responding to any expert testimony offered by appellant on earth issues,  
13      groundwater and/or hazardous substances.

14       **4.       Christina Schmitt, PE, Senior Air Quality Engineer AECOM - Ms. Schmitt is**

15      expected to testify concerning the methodology used in the EIS for the odor, air quality and  
16      greenhouse gas analyses and mitigation. She is also expected to testify concerning her opinion  
17      that the EIS is adequate under SEPA in the area of odor, air quality and greenhouse gases.

18      Specific areas of testimony will also likely include, without limitation, any odor and air quality  
19      issues raised by appellant in its statement of appeal, including cumulative and indirect impact  
20      analysis and any other specific issues raised by the appellant. She will respond to any expert  
21      testimony offered by appellant on these issues.

22       **5.       Mike Usen, AICP, Senior Planner, AECOM - Mr. Usen is expected to testify**

23      concerning the methodology used in the EIS for the analyses of land use, including impacts to

1 land use from the construction and operation of the SCRTS. He is also expected to testify  
2 concerning his opinion that the EIS is adequate under SEPA in its analysis of existing conditions,  
3 impacts and mitigation regarding land uses, zoning and land use plans and policies. Specific  
4 areas of testimony will also include, without limitation, addressing the allegation in appellant's  
5 Statement of Appeal that the EIS fails to analyze siting criteria for essential public facilities  
6 require by King County Comprehensive Plan and any other specific issue raised by the appellant  
7 regarding this land use, zoning or local plans and/or policies. He will also respond to any expert  
8 testimony offered by appellant on these issues.

9 Mr. Usen is also expected to testify concerning the methodology used in the EIS for the  
10 analyses of impacts to energy and natural resources and mitigation regarding the construction  
11 and operation of the SCRTS. He is also expected to testify concerning his opinion that the EIS is  
12 adequate under SEPA in its analysis of impacts and mitigation regarding energy and natural  
13 resources. Mr. Usen is also expected to testify concerning the methodology used in the EIS for  
14 the analyses of impacts on public services and utilities from the construction and operation of the  
15 SCRTS. He is also expected to testify concerning his opinion that the EIS is adequate under  
16 SEPA in the area of public services and utilities. Specific areas of testimony will also include,  
17 without limitation, addressing any issues raised by the appellant regarding these matters.

18 6. **Katy Chaney**, Senior Environmental Planner and Vice President, AECOM - Ms.  
19 Chaney is expected to testify concerning the methodology used in the EIS for the analyses of  
20 land use, including impacts to land use from the construction and operation of the SCRTS. She is  
21 also expected to testify concerning his opinion that the EIS is adequate under SEPA in its  
22 analysis of existing conditions, impacts and mitigation regarding land uses, zoning and land use  
23 plans and policies. Specific areas of testimony will also include, without limitation, addressing

1 the allegation in appellant's Statement of Appeal that the EIS fails to analyze siting criteria for  
2 essential public facilities require by King County Comprehensive Plan and any other specific  
3 issue raised by the appellant regarding this land use, zoning or local plans and/or policies. She  
4 will also respond to any expert testimony offered by appellant on these issues.

5 Ms. Chaney is also expected to testify concerning the methodology used in the EIS for  
6 the analyses of impacts to energy and natural resources and mitigation regarding the construction  
7 and operation of the SCRTS. She is also expected to testify concerning her opinion that the EIS  
8 is adequate under SEPA in its analysis of impacts and mitigation regarding energy and natural  
9 resources. Ms. Chaney is also expected to testify concerning the methodology used in the EIS for  
10 the analyses of impacts on public services and utilities from the construction and operation of the  
11 SCRTS. She is also expected to testify concerning his opinion that the EIS is adequate under  
12 SEPA in the area of public services and utilities. Specific areas of testimony will also include,  
13 without limitation, addressing any issues raised by the appellant regarding these matters.

14 7. **Matt Kuharic**, Climate Change Program Coordinator, Department of Natural  
15 Resources and Parks, King County - Mr. Kuharic is expected to testify concerning the  
16 methodology used in the EIS for the greenhouse gas analyses and mitigation. He is also expected  
17 to testify concerning his opinion that the EIS is adequate under SEPA in the area greenhouse  
18 gases. Specific areas of testimony will also include any other specific issues raised by the  
19 appellant on these issues.

20 8. **Phil Newton**, PE, Senior Engineer, AECOM - Mr. Newton is expected to opine  
21 that the EIS is adequate under SEPA in the areas of water resources, including but not limited to  
22 surface water and stormwater management for the SCRTS sites. Specific areas of testimony  
23 likely will include, without limitation, the methodology and assessment of impacts to surface

1 water and stormwater volumes. This testimony may also address any specific issues raised by  
2 appellant in its Statement of Appeal including impacts and mitigation regarding the headwater  
3 stream of Algona Creek and any other specific issues raised by appellant. He may also respond  
4 to any expert testimony offered by appellant on these issues.

5 Mr. Newton is also expected to testify concerning the methodology used in the EIS for  
6 the analyses of impacts on public services and utilities from the construction and operation of the  
7 SCRTS. He is also expected to testify concerning his opinion that the EIS is adequate under  
8 SEPA in the area of public services and utilities. Specific areas of testimony will also include,  
9 without limitation, addressing any issues raised by the appellant regarding these matters.

10 Mr. Newton is also expected to address road pavement capacity and truck trips impacts  
11 on the surrounding roads in reference to the Transportation section.

12 9. **Stephen Blanton**, PE, CWRE, AECOM , - Mr. Blanton is expected to opine that  
13 the EIS is adequate under SEPA in the areas of water resources including, without limitation,  
14 impacts to groundwater and streams, and surface water analysis and stormwater management for  
15 the SCRTS sites and mitigation. Specific areas of testimony likely will include, without  
16 limitation, the methodology and assessment of impacts to groundwater and stormwater volume.  
17 This testimony may also address any specific issues raised by appellant in its Statement of  
18 Appeal including impacts and mitigation regarding the headwater stream of Algona Creek and  
19 any other specific issues raised by appellant. He may also respond to any expert testimony  
20 offered by appellant on these issues.

21 10. **James Flynn**, RG, LHG, Senior Hydrogeologist, AECOM is expected to opine  
22 that the EIS is adequate under SEPA in the areas of water resources including, without  
23 limitation, impacts to groundwater and streams, and surface water analysis and stormwater

1 management for the SCRTS sites and mitigation. Specific areas of testimony likely will include,  
2 without limitation, the methodology and assessment of impacts to groundwater and stormwater  
3 volume. This testimony may also address any specific issues raised by appellant in its Statement  
4 of Appeal including impacts and mitigation regarding the headwater stream of Algona Creek and  
5 any other specific issues raised by appellant. Mr. Flynn will also respond to any expert  
6 testimony offered by appellant on earth issues, groundwater and/or hazardous substances. He  
7 may also respond to any expert testimony offered by appellant on these issues.

8       11. **Paul Hamidi**, PWS, CPSS, Senior Wetland & Soil Scientist, AECOM – Mr.  
9 Hamidi is expected to opine that the EIS is adequate under SEPA in the area of analysis of  
10 impacts to vegetation, wetlands and streams caused by the construction and operation of the  
11 SCRTS. This testimony may also address any specific issues raised by appellant in its Statement  
12 of Appeal including impacts and mitigation regarding the headwater stream of Algona Creek and  
13 any other specific issues raised by appellant. He may also respond to any expert testimony  
14 offered by appellant on these issues.

15       12. **Stephen Conroy**, PhD, Environmental Scientist III, Road Services Division, King  
16 County, Dr. Conroy is expected to opine that the EIS is adequate under SEPA in the areas of  
17 water resources including, without limitation, streams, fish and fish habitat for the SCRTS sites  
18 and mitigation. Specific areas of testimony likely will include, without limitation, the  
19 methodology and assessment of impacts to streams, fish and habitat. This testimony may also  
20 address any specific issues raised by appellant in its Statement of Appeal including impacts and  
21 mitigation regarding the headwater stream of Algona Creek and any other specific issues raised  
22 by appellant. He may also respond to any expert testimony offered by appellant on these issues.

1       13. **Jenny Pretare**, PhD., Senior Wildlife Biologist, AECOM – Dr. Pretare is  
2       expected to testify concerning the methodology used in the EIS for the analyses of impacts to  
3       wildlife species and fish, including federal and/or state listed and candidate species and their  
4       habitats and mitigation. She is also expected to testify concerning her opinion that the EIS is  
5       adequate under SEPA in its analysis of impacts and mitigation regarding wildlife species and fish  
6       and their habitats. Specific areas of testimony will also include, without limitation, addressing  
7       any issues raised by the appellant regarding these matters. She may also respond to any expert  
8       testimony offered by appellant on these issues.

9       14. **Adam Jenkins PE (OR), INCE Bd. Cert., The Greenbusch Group, Inc.** - Mr.  
10      Jenkins is expected to testify concerning the methodology used in the EIS for the analyses of  
11      noise impacts from the construction and operation of the SCRTS. He is also expected to testify  
12      concerning his opinion that the EIS is adequate under SEPA in its analysis of impacts and  
13      mitigation regarding noise. Specific areas of testimony will also include, without limitation,  
14      addressing any issues raised by the appellant regarding these matters.

15      15. **David Raubvogel**, PG, LHG, LG, Senior Geologist, AECOM - Mr. Raubvogel is  
16      expected to testify concerning the methodology used in the EIS for the analyses of hazardous  
17      materials and potential impacts from the construction and operation of the SCRTS. He is also  
18      expected to testify concerning his opinion that the EIS is adequate under SEPA in its description  
19      of existing conditions and its analysis of impacts and mitigation regarding hazardous materials.  
20      Specific areas of testimony will also include, without limitation, the hazardous substance issue  
21      raised by the appellant in its Statement of Appeal, including but not limited to the use of the  
22      Phase 1 environmental site assessment of the action alternatives and any other specific issue  
23      raised by the appellant regarding this matter.

1           16. **Al Thatcher**, AECOM - Mr. Thatcher is expected to testify concerning the  
2 methodology used in the EIS for the analyses of hazardous materials and potential impacts from  
3 the construction and operation of the SCRTS. He is also expected to testify concerning his  
4 opinion that the EIS is adequate under SEPA in its description of existing conditions and its  
5 analysis of impacts and mitigation regarding hazardous materials. Specific areas of testimony  
6 will also include, without limitation, the hazardous substance issue raised by the appellant in its  
7 Statement of Appeal, including but not limited to the use of the Phase 1 environmental site  
8 assessment of the action alternatives and any other specific issue raised by the appellant  
9 regarding this matter.

10           17. **John Long**, LG, LHG, AMEC - Mr. Long is expected to testify concerning the  
11 methodology used in the EIS for the analyses of hazardous materials and potential impacts from  
12 the construction and operation of the SCRTS. He is also expected to testify concerning his  
13 opinion that the EIS is adequate under SEPA in its description of existing conditions and its  
14 analysis of impacts and mitigation regarding hazardous materials. Specific areas of testimony  
15 will also include, without limitation, the hazardous substance issue raised by the appellant in its  
16 Statement of Appeal, including but not limited to the use of the Phase 1 environmental site  
17 assessment of the existing Algona Transfer Station and any other specific issue raised by the  
18 appellant regarding this matter.

19           18. **Kathleen Goodman**, LG, LHG, RG, AMEC - Ms. Goodman is expected to  
20 testify concerning the methodology used in the EIS for the analyses of hazardous materials and  
21 potential impacts from the construction and operation of the SCRTS. She is also expected to  
22 testify concerning her opinion that the EIS is adequate under SEPA in its description of existing  
23 conditions and its analysis of impacts and mitigation regarding hazardous materials. Specific

1 areas of testimony will also include, without limitation, the hazardous substance issue raised by  
2 the appellant in its Statement of Appeal, including but not limited to the use of the Phase 1  
3 environmental site assessment of the existing Algona Transfer Station and any other specific  
4 issue raised by the appellant regarding this matter.

5       19.    **Stephanie Butler**, M.A., RPA, Senior Archaeologist, AECOM - Ms. Butler is  
6 expected to testify concerning the methodology used in the EIS for the analyses of cultural  
7 resources and the potential impacts that could occur from the construction and operation of the  
8 SCRTS. She is also expected to testify concerning her opinion that the EIS is adequate under  
9 SEPA in the area of cultural resources. Specific areas of testimony will also include, without  
10 limitation, addressing the allegation in appellant's Statement of Appeal regarding deferred  
11 analysis and any other specific issue raised by the appellant regarding cultural resources.

12       20.    **Sarah McDaniel**, M.A., RPA, Archaeologist, AECOM - Ms. McDaniel is  
13 expected to testify concerning the methodology used in the EIS for the analyses of cultural  
14 resources and the potential impacts that could occur from the construction and operation of the  
15 SCRTS. She is also expected to testify concerning her opinion that the EIS is adequate under  
16 SEPA in the area of cultural resources. Specific areas of testimony will also include, without  
17 limitation, addressing the allegation in appellant's Statement of Appeal regarding deferred  
18 analysis and any other specific issue raised by the appellant regarding cultural resources.

19       21.    **Phillippe LeTourneau**, PhD, Archaeologist, King County Department of  
20 Natural Resources and Parks, Historic Preservation Program - Dr. LeTourneau is expected to  
21 testify concerning the methodology used in the EIS for the analyses of cultural resources and the  
22 potential impacts that could occur from the construction and operation of the SCRTS. He is also  
23 expected to testify concerning his opinion that the EIS is adequate under SEPA in the area of

1 cultural resources. Specific areas of testimony will also include, without limitation, addressing  
2 the allegation in appellant's Statement of Appeal regarding deferred analysis and any other  
3 specific issue raised by the appellant regarding cultural resources.

4       22. **Mike Swenson**, PE, Principal, Transpo Group – Mr. Swenson is expected to  
5 testify concerning the methodology used in the EIS for analyzing potential traffic-related impacts  
6 from the construction and operation of the SCRTS. He is also expected to testify, without  
7 limitation, regarding his opinion that the EIS is adequate under SEPA in the area of  
8 transportation. Mr. Swenson's testimony will also address specific appeal issues raised by  
9 appellant regarding failure to analyze and disclose significant adverse environmental impacts  
10 concerning local traffic, and will respond to any expert testimony offered by appellant on  
11 transportation issues.

12       23. **Charlie Conway**, KPG – Mr. Conway is expected to testify concerning the  
13 methodology used in the EIS for analyzing impacts from the construction and operation of the  
14 SCRTS in the areas of earth and utilities. He is also expected to testify, without limitation,  
15 regarding his opinion that the EIS is adequate under SEPA in the area of earth and utilities. Mr.  
16 Conway's testimony will also address specific appeal issues raised by appellant including but not  
17 limited to the allegation that the EIS defers analysis of cut and fill volumes regarding alternative  
18 2. Mr. Conway will also respond to any expert testimony offered by appellant on these issues.

19       24. **Louise Kling**, Senior Environmental Planner, AECOM – Ms. Kling is expected  
20 to testify concerning the methodology used in the EIS for analyzing impacts from the  
21 construction and operation of the SCRTS in the area of visual quality and aesthetics. She is also  
22 expected to testify, without limitation, regarding her opinion that the EIS is adequate under  
23 SEPA in the area of visual quality and aesthetics. Ms. Kling's testimony will also address

specific appeal issues raised by appellant and will also respond to any expert testimony offered by appellant on these issues.

25. **Custodian of Records of City of Algona** may be called upon to testify concerning the plans, policies and ordinances of the City of Algona, and development in the vicinity of Alternative 2.

26. **Custodian of Records of City of Auburn** may be called upon to testify concerning the plans, policies and ordinances of the City of Auburn, and development in the vicinity of Alternative 1.

DATED this 7th day of December, 2016.

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