

## **Nouri Appellants Witness and Exhibits List**

Revised as of 11/18/15  
(LAND-214-01980)

### **WITNESSES**

#### **Sandra Eisert**

- Sandra Eisert is a neighbor to the Nouri property, within the 500-foot arc notified of development by the City, a resident of 20 years and the representative for the Appellants.
- She will present the case and will address the reasons for neighbor concerns regarding the specifics in both the tree and water issues, outlined in the Appeal.
- She will make reference to Redmond Code regarding trees and storm water, as listed in the appeal. She will also make reference to publicly provided maps/documents for the site as well as maps/documents located in Public Records discovery. City documents, including Nouri project maps and included details, will be presented indicating information made available to the neighborhood along with the time range of document presentation.
- City code will be referenced, including Public Notice RZC 21.76.080(B)(3)(a), Environmental Regulations Article IV 21.72.010 A.1.,2.,6; Landmark Tree Exceptions, Article IV, RZC 21.72.060, A.2; and RZC 21.72.080; RZC 21.72.090 A.;B. and RZC 21.72.060 B and City ordinances including excerpts from the City of Redmond 2012 Clearing, Grading and Stormwater Management Technical Notebook will be included including sections 2, 7 and 8, with particular attention to 7.2, 8.4.10. and 2.5.4

#### **Tom Hinman**

- Thomas Hinman is a 12-year Redmond resident who lives in Overlake. He has a land use and environmental planning certificate from US Davis and has served on Planning Commissions in Marin County, California and Redmond, Washington - where he spent nearly 8 years as Commissioner including 2 years as Commission Chair. Since terming out of the Redmond Planning Commission in 2012, he has been a frequent voice demanding full public notice and community engagement in sustaining Redmond's "green" character, specifically as related to tree preservation. Tom Hinman is a board member of Sustainable Redmond and facilitator of Imagine Overlake, a grass roots organization formed in the aftermath of the Group Health Hospital redevelopment project to advocate for residential quality of life in that fledgling urban center.
- Tom will address community character, tree exception practices and public notice regarding the Nouri Short Plat appeal.
- He will provide relevance and context to the Appeal as well as referencing his statement.

## **EXHIBITS:**

### **Exhibit 1 – *Hinman Statement on Nouri Short Plat* dated 10/31/15**

- This report addresses community character and the context of the tree issues for the property.
- This report contains 11 photographs of the site and immediately adjacent neighborhood, made 10/6/15.
- His report also contains a diagram showing the locations where the photographs were made.

### **Exhibit 2 – *Nouri\_ShortPlatReport-Tina Cohen*, dated 10/9/15**

- This is an Arborist Report on Nouri Short Plat by Tina Cohen dated 10/9/15, providing an independent arborist assessment of field conditions on 10/5/15, noting issues with the tree count.
- Tina Cohen is an ISA Certified Arborist #PN0245A, an American Society of Consulting Arborists' Registered Consulting Arborist #473 and an ISA Tree Risk Assessment Qualified arborist.
- It includes 2 photographs made October 5, 2015, by Tina Cohen of two wild cherry trees on the site.
- It includes, in the original table form, the site's original Summary of Tree Retention table

### **Exhibit 3 - *Redmond Tree Exception Approval Practices* -**

Tree Retention Study Findings from Sustainable Redmond, April 2, 2013 as presented to Redmond City Council.

- This document addresses RZC 21.72.090 A & B as actually implemented over time

### **Exhibit 4 – *Gilles Affidavit, Nouri SP, Redmond***

- This is an Arborist Report on Nouri Short Plat by Brian Gilles dated 11/11/15. It provides additional assessment of field conditions. It will confirm issues with the tree count as well as addressing potential harm to trees on adjacent property.
- Brian Gilles is an ISA Certified Arborist #PN-0260A, an (ASCA) American Society of Consulting Arborists Registered Consulting Arborist #RCA-418an ISA TRAQ Qualified and is an ISA TRAQ Certified Instructor.

### **Exhibit 5 – Flawed Public Notice**

- *Introduction* – Discussion of Flawed Public Notice – With Reference to Redmond Code RZC 21.76.080
- *Attachment A* – Sustainable Redmond Testimony – Extract from Public Hearing Testimony on Community Engagement
- *Attachment B* – Emails Regarding Open Space – Two Emails from City Planner Heather Maiefski to the Applicant's Team Discussing "open space."
- *Attachment C* – Neighborhood Meeting Notice – Envelope and Notice from the Developer With Map
- *Attachment D* – Kim Yates Affidavit – Regarding Mailings Received and Information Not Received

- *Attachment E* – City's Notice of Development Mailing to Neighbors – Including the Full Mailing and Envelope

**Exhibit 6** – Even Application of the Law to Single Family Homeowners with Affidavits 6a and 6b

- This document addresses RZC 21.72.020 Developed Single-Family Lots as interpreted by Planning staff to homeowners concerned about hazardous landmark trees.

**Exhibit 6 A & B** – Duncan and Phillips Neighbor Affidavits (One PDF Document File)

- **Exhibit 6A** – *Jennifer Duncan Affidavit* – indicating how the City handled a tree issue on her property across the street.
- **Exhibit 6B** – *Rohan Phillips Affidavit* – indicating how the City handled a tree issue on his property in the neighborhood

**Exhibit 7** – Nouri Water Report by Chris Pitre

- Chris Pitre is a principal at Coho Water Resources, LLC with approximately 25 years' experience working in the area of integrated water resource management. He is licensed by the State of Washington to practice in geology and hydrogeology (License # 1439). He is a certified water rights examiner (#003). He has Honour's Bachelor degrees in chemistry and geology from the University of Carleton, Ottawa, Canada, and a Master's degree in earth sciences (hydrogeology) from the University of Waterloo, Canada. Mr. Pitre's areas of practice include water supply, storm water, waste water, and reclaimed water. Areas of specialization include water rights, and Managed Aquifer Recharge, including surface infiltration and direct injection.
- He will review the available documentation of proposed storm water management at the site considering potential impacts on neighboring properties, specifically with respect to the impairment of septic system operation, flooding of basement and crawl spaces and other similar concerns, as well as documentation consistency, compliance with state and city storm water management regulations, protection of groundwater quality.
- Diagrams of soil strata and distribution are referenced in his report, others may be provided as supplemental to it.