EXHIBIT SUPPLEMENTAL 14

kfriend@localaccess.com

RECEIVED

From: Dan Leahy <danleahy43@yahoo.com>
Sent: Wednesday, January 30, 2019 8:16 PM
To: mscheibmeir@localaccess.com
Cc: Steve Hall; Cheryl Selby; Bruce Titus; James R. Tomlinson; tjw@buddbaylaw.com; kfriend@localaccess.com; Tim Smith; Cari Hornbein; Steve Thompson; Jeff Fant; David Smith; mlucente@dpearson.com; Nathaniel Jones; Paula Smith
Subject: File No. 18-1315. Public Hearing. February 4th
Attachments: wellington. Schmeibmeir.doc; Untitled attachment 00006.htm

Mark Scheibmeir, Hearing Examiner

City of Olympia February 4th Public Hearing

Dear Mark,

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Also, under 18.82.80 Improper influence, conflict of interest and appearance of fairness, it states "No City official, elective or appointive, shall attempt to influence the Hearing Examiner in any matter officially before him as as to constitute .... a violation of the Appearance of Fairness Doctrine."

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Now in a blatant demonstration of their continued lack of any appearance of fairness or impartiality, they have denied Mr. Titus' SEPA appeal not based upon his timely submission, but based on the $1000 fee apparently arriving one day later.

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The Staff is Asking you to Change the Comprehensive Plan. This is the City Council's Jurisdiction, not yours.

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The staff, Mr. Vo and Chris Merritt's placement of a "Future Road Connection" from 18th Avenue to the middle of the neighborhood created Decatur Pedestrian and Bike Pathway is an attempt to override the City Council, the Comprehensive Plan and Olympia citizens who participated fully in the construction and approval of this Plan. It was the Council and not the subordinate Hearing Examiner who approved the Plan.

Procedurally, you need to recognize that the decision about whether or not the Future Road Connection into Decatur SW is a violation of the Comprehensive Plan belongs to the legislative body, the Mayor and City Council.

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The staff's promotion of a project sponsored by ABS Investments LLC is financially irresponsible and injurious to the City's tax payers. Regardless of the personal opinion of Keith Stahley, the City has a fiduciary responsibility to examine the financial capabilities of entities like ABS Investments LLC before devoting staff and community time to a proposed project. This has not been done.

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In addition, if there is no determination of financial viability, the City planning staff is in essence inappropriately attempting to lend the credit of the city by granting an asset, a plat approval, to a developer with history of bankruptcy.

No Transparency. No Decision. Absence of Property Title and Site Ownership.

The City staff has spent the last 15 months considering a project even though the two entities that own the 9.4 acres are not a part of the City's review. Neither Alex Vo, Nick Leung or ABS Investments LLC own the 9.4 acres which is the site of this proposed project.

Whatever agreement there is between the actual owners and ABS Investments LLC has never been a part of this 15 month process. Without the knowledge of this agreement, its terms and duration, there can be no valid SEPA MDNS procedure, nor regulatory judgment made by the Hearing Examiner. At the minimum, before any legitimate planning process can continue, this agreement must become transparent and public. Whatever agreement ABS Investments LLC may have had with the two LLCs that own the 9.4 acres could, for all you know, already be terminated.

Until the Hearing Examiner has checked to see that there is an agreement to sell this proposed site to ABS Investments LLC is still in effect, there is no legitimate procedural basis to proceed with this project's approval.

Contradictory Basis for Threshold Determination: October 26th or December 27th.

Prior to the issuance of MDNS on October 26th, the City was in receipt of a preliminary drainage plan that was "submitted on October 11, 2018." With this plan in hand, the City issued a MDNS that contained four mitigating conditions for off-site stormwater impacts they believed to be necessary.

Then, the City in its December 27th MDNS, cited, without presenting any new data, this same October 11th document to say that two of these mitigating conditions are no longer necessary. Both assertions can't be true. The Hearing Examiner must interrogate this contradiction.

The Conduct of the Traffic Impact Analysis.

This MDNS references traffic mitigation and also a Traffic Impact Analysis (TIA). The TIA conducted for this project violated the City's own procedures, should have been rejected and provides no legitimate basis upon which an MDNS can be based or a project approved.

1. TIA Guidelines for New Developments (Ordinance No. 7110) states the TIA "must follow the City of Olympia guidelines for a Traffic Impact Analysis".

The staff procedure on this TIA did not follow the guidelines thereby **foreclosing** the right of the parties of record access to a record/analysis upon which they could enter on substantive grounds the mandated Hearing Examiner's public hearing.

On Page 1 of the Guidelines there is a description of "Traffic Impact Analysis Scoping Meeting." The staff did not hold a scoping meeting for this project. Despite numerous assurances to the parties of record that such a meeting would be held in the future (Paula Smith, March 15, 2018; Dave Smith, March 19, 2018) it was not held. On March 22, 2018, Assistant Planner Paula Smith informed us that, "A meeting was not held."

In the absence of such a meeting, the parties of record are denied a subsequent written report. We received such a post meeting report on the Storm Water Scoping meeting, but not on the TIA. The absence of this written record on a TIA scoping meeting forecloses the right of the parties of record to comment before the Hearing Examiner at the mandatory public hearing.

2. The TIA Guidelines call for an analysis "on the surrounding transportation system" (p. 2) and that it "shall be a thorough review of the immediate and long range effects of the new development on the transportation system." (page 3).

The staff directions to the consultant ensured that this "thorough review" would not & could not be accomplished. Thus, both the Hearing Examiner and the Parties of Record are denied a substantive basis upon which to both critique and make judgments about the effects of this application for a preliminary plat by Mr. Vo.

As is well documented by the City's own "West Olympia Access Study," or the Westside portion of the City's recent mapping for its "Transportation 2030," the "surrounding transportation system" is much greater than what the staff determined the consultant should review for this TIA. (These studies need to be included in the record for the Hearing Examiner).

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The absence of such an analysis forecloses the ability of the Hearing Examiner and the parties of record to enter the mandated hearing on a substantive basis or for the Hearing Examiner to make legitimate judgments in the presence of accurate information.

3. The City staff did not email the TIA to the parties of record thus again foreclosing their right to participate in the mandated public hearing on substantive grounds.

The City staff did email the materials from the Storm Water Scoping meeting to the parties of record as required, but it did not email the TIA to the parties of record. The City staff noted that the TIA was available on the City's website via a link that was broken and dysfunctional. Nevertheless, the availability of the City's website is not what is legally required to meet the City's obligation to notify parties of record. This obligation requires direct communication of substantive materials to the parties of record. This did not happen with the TIA.

4. City of Olympia Transportation Engineer David S. Smith indicated to the consultant that he "discuss future connection to Decatur." (March 21, 2018). This promotion by a City staff member of a flagrant violation of the City's Comprehensive Plan which deleted this connection in 2014. The promotion by this staff member calls into question again not only the integrity of the City's procedure, but also the legitimacy and purpose of the TIA itself.

The connection to Decatur that Engineer Smith and City staff are promoting is an automobile connection from the proposed 18th Avenue inside Mr. Vo's preliminary plat design east to Decatur SW. This automobile connection would exit across Mrs. George Johnson's property and into the middle of a 273 foot Bike/Pedestrian Pathway. Not only does the City have no right to cross Mrs. Johnson's property, but this Pathway is permanently closed to automobile traffic, as decided by the City Council and included in the Comprehensive Plan update of 2014.

Such an option can not legitimately come before the Hearing Examiner unless the City Council has changed its Comprehensive Plan. It has not.

5. The Southwest Olympia Neighborhood Association (SWONA) was denied what they believe to be observation rights to scoping meetings thus frustrating and foreclosing its ability to participate in the public hearing process on a substantive basis.

When SWONA was informed by CP&D Director Stahley that scoping meetings were not "public meetings" and therefore SWONA representatives would not be informed in advance or allowed to observe, SWONA asked for the City's legal opinion upon which Mr. Stahley's assertion was based. The City's attorney never provided SWONA with that opinion nor did the City Council direct the City attorney to respond.

In the absence of any written legal opinion justifying the exclusion of parties of record or SWONA from these scoping meetings by Mr. Stahley, the parties of record have unjustly been denied information pertinent to their ability to participate on a substantive basis in the public hearing.

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1415 6th Avenue SW

Olympia, WA. 98502

January 30, 2019

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Hearing Examiner
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February 4th Public Hearing

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