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BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeals of:

FRIENDS OF MADISON PARK, TREVOR
COX & JAKE WEYERHAEUSER,
HAWTHORNE HILLS COMMUNITY
COUNCIL, CHRIS R. YOUTZ, JOHN M.
CARY, and JENNIFER GODFREY et. al.

Hearing Examiner File: W-25-001,-002,-
003,-004,-005, and-006 (consolidated)

**DECLARATION OF LARRY
JOHNSON IN OPPOSITION TO CITY
OF SEATTLE’S MOTION TO
DISMISS**

Larry Johnson declares under penalty of perjury and in accordance with the laws of the
State of Washington as follows:

BACKGROUND

Formation of Our Board and the Ravenna-Cowen North National Historic District

1. I am the current Board President of Friends of Ravenna-Cowen, a Washington State
non-profit corporation. I am a retired architect and very knowledgeable about Seattle’s
historic resources. I enjoy researching archives, old maps, and legends to learn about
Seattle’s history, and particularly my neighborhood’s history. My wife and I have lived
in the Ravenna community since 1972, and in what is now the Ravenna-Cowen National

1 Historic District from 1976 to present. For four decades, my architecture firm
2 specialized in historic restoration and designs homes and buildings to fit in with the
3 neighborhood. I have been retained numerous times to evaluate various buildings and
4 homes to determine whether they should be Landmarked. In the course of my career, I
5 have had to learn about building codes, SEPA, the Growth Management Act, Seattle's
6 version of SEPA, Seattle's Landmark process and ordinance, state and federal laws
7 governing archaeological artifacts, the resources of the state's Department of
8 Archaeology and Historic Preservation, Seattle's Office of Historic Preservation, as well
9 as the National Historic Preservation Act, 54 U.S.C. 300101 *et seq.*

- 10
- 11 2. My wife and I love this Ravenna neighborhood and immediately recognized the historic
12 significance of the neighborhood we live in. The middle-class houses were built
13 primarily during the years 1909 to 1929. Nearly all the homes are well-maintained and
14 each is unique. Some were built by famous architects of that era, others from a
15 Craftsman plan catalogues. Mr. Larry Kreisman, a renowned expert on the Craftsman
16 era, who is now retired from Historic Seattle, and I conducted walking tours of Ravenna
17 and Cowen homes. Due to the uniqueness, intactness, and appeal of this neighborhood,
18 these tours were always sold out. Before working at Historic Seattle, Mr. Kreisman was
19 hired by the City to identify houses and buildings of historic significance in a city-wide
20 survey through the Seattle Department of Neighborhoods, Office of Historic Resources.
21
- 22 3. That Office had been and still is severely underfunded. I and others knew that the City
23 would never get around to surveying or landmarking this neighborhood. We decided to
24 set up a non-profit corporation and pursue state and national recognition as a historic
25 district. On August 17, 2017, five neighborhood residents incorporated Friends of
26 Ravenna-Cowen (FORC). Subsequently, in about October, 2017, Ms. Judith Bendich, an

1 attorney in our neighborhood, was invited to be a board member because she had
2 experience serving on non-profit boards.

- 3 4. I was one of the original board members. FORC’s purpose was “To preserve and protect
4 the heritage of the Ravenna-Cowen neighborhood as a shared community.” We
5 contacted the Washington State Department of Archaeology and Historic Preservation
6 for guidance on the appropriate boundaries for a historic district. I did a walk-through
7 with one of their senior staff, Michael Houser, WA State Architectural Historian. Mr.
8 Houser determined what the boundaries should be. As soon as that was set, each board
9 member was assigned various tasks to complete a thorough description and history of all
10 443 houses and outbuildings within the boundaries. This Nomination documentation was
11 done following the US Secretary of Interior’s standards for listing on the National
12 Register; this took over eight months and was all completed by volunteers. The 481-
13 page application was submitted on April 29, 2018 to the Washington State Governor's
14 Advisory Council on Historic Preservation for nomination of the proposed Ravenna-
15 Cowen North Historic District to the National Historic Register and the Washington
16 Heritage Register. The Governor’s Council approved the application and sent it to the
17 United States Department of the Interior National Park Service. On September 14, 2018,
18 Alyson Brooks, Ph. D, the Washington State Historic Preservation Officer, notified us
19 that the Ravenna-Cowen North National Historic District was listed on the National
20 Historic Register. Subsequently, we applied to the City of Seattle for a \$5,000 grant to
21 install street signs to identify this new National Historic District. The City awarded us
22 the grant. The application to the Governor’s Council as well as other information about
23 Friends of Ravenna-Cowen’s activities is listed on our web site,
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www.friendsofravennacowen.org.

MHA APPEAL

- 1
- 2 5. Around November 2017, we became aware that an appeal of the Final Environmental
- 3 Impact Statement regarding the MHA upzoning and 2035 Comprehensive Plan was
- 4 being considered by a group called SCALE, the Seattle Coalition for Affordability,
- 5 Livability and Equity. SCALE’s president asked to meet with us, and the Board agreed.
- 6 He urged us to join the coalition, which by that point included 24 neighborhood and
- 7 environmental groups. We were aware that the FEIS recommended upzoning close to
- 8 one-third of our district, including the Cowen section in the Roosevelt Urban Village and
- 9 the two blocks east of 15th Avenue N.E. to 17th Avenue N.E. between N.E 65th Street and
- 10 62nd Avenue N.E in the Ravenna section. The Board approved joining SCALE. The
- 11 Board also appointed two Board members to attend coalition meetings. SCALE had
- 12 retained the law firm of Bricklin & Newman to pursue whether to appeal, and, if so,
- 13 what issue to address.
- 14
- 15 6. Five days before the appeal was due, we were informed by SCALE’s attorneys that they
- 16 had enough on their plate and we needed to file our own appeal. The Board asked Ms.
- 17 Bendich if she would do that. Although she had never had any land use nor
- 18 environmental cases in her practice, she agreed to file our appeal, which she discusses in
- 19 her declaration. Meanwhile, the rest of the Board continued to work on the application.
- 20 Ms. Bendich kept us informed about the appeal. One Board member and several
- 21 neighborhood residents testified, including a naturalist who lives in our Historic District,
- 22 and an architect who was knowledgeable about the Roosevelt Neighborhood Plan. Mr.
- 23 Kreisman testified on our behalf, as did a professor from the University of Washington,
- 24 Kern Ewing, Ph. D. The appeal extended into September, and news that the National
- 25 Park Service approved our District was among the last exhibits for the hearing. The legal
- 26

1 process continued because the Hearing Examiner determined the FEIS was inadequate
2 regarding historic resources and required the City to file an additional EIS. After that,
3 SCALE appealed other issues to the Growth Management Hearing Board. The Hearing
4 Board found in favor of the City.

- 5 7. The next step, was with the Seattle City Council. The Board approved a petition and
6 gathering signatures to ask our 4th District Councilmember, Mr. Rob Johnson, to amend
7 Council Bill 119443 to exempt the Ravenna-Cowen North National Historic District
8 from all MHA upzones. Board members doorbelled, gathered approximately 600
9 signatures, and presented the petition to Councilmember Johnson and the City Council.
10 Ultimately, Councilmember Johnson moved to amend CB 119443 to “Remove areas in
11 the Ravenna-Cowen North National Historic District from a potential expansion area in
12 the Roosevelt Residential Urban Village.” The City Council unanimously approved this
13 amendment.
14

15 **CURRENT APPEAL OF THE FEIS TO THE DRAFT SEATTLE ONE PLAN**
16

- 17 8. Friends of Ravenna-Cowen has significant concerns about OPCD’s compliance with
18 virtually every element of SEPA, including procedural irregularities. FORC submitted a
19 timely comment letter simultaneously to OPCD (regarding its draft EIS) and to the draft
20 Seattle One Plan. Members of our Board also submitted timely comments to both,
21 including but not limited to Ms. Bendich, Ms. Lori Cohen, Mr. J.D. Lum, and Ms. Lani
22 Johnson.
23 9. After the supposed deadline for comments, in October, 2024, OPCD issued a two-page
24 pdf:
25 [https://www.glb.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlan](https://www.glb.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanGrowthStrategySummary-2pager.pdf)
26 [GrowthStrategySummary-2pager.pdf](https://www.glb.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanGrowthStrategySummary-2pager.pdf), entitled “Mayor Harrell’s One Seattle Plan”

1 stating it would “increase overall housing capacity to over 330,000 units” (the original
2 draft Seattle One Plan ranges from 80,000 to 112,000 new units, and the draft FEIS was
3 premised on those numbers). The pdf gave meeting dates of when we “would be
4 informed.”

5 10. On October 24, 2024, OPCD issued an “Updated Neighborhood Residential Report” that
6 substantially changed density in our neighborhood and throughout the City. The new
7 maps added block after block of LR 3, 5-story buildings in the Ravenna section of the
8 Ravenna-Cowen North National Historic District, but not in the Cowen section. To my
9 knowledge there was no public outreach about this “Updated Residential Report” before
10 it was issued. It came out of the blue. There was no supplemental draft EIS about the
11 impacts of these changes. Councilmember Maritza Rivera sent constituents her news
12 letter dated December 22, 2025, and wrote, “I too have questions about this process and
13 want to acknowledge that the information I have received from OPCD over the past few
14 months has been confusing and incomplete. The department has put forth its strategy for
15 increased density without accompanying plans for transportation, utilities and other
16 infrastructure, and climate goals. We need to take a holistic approach, per the
17 Washington State Growth Management Act (GMA) which requires that comprehensive
18 plans come with strategies for transportation, infrastructure, and climate resilience.”

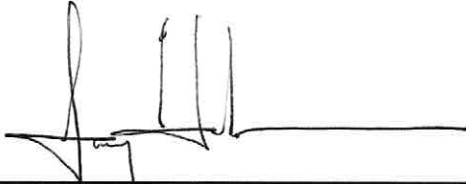
19 11. FORC sent a timely comment letter on December 12, 2023 to OPCD about the “update”
20 and maps. Also, Board members Ms. Bendich, Ms. Cohen, Mr. Lum, and Lani Johnson
21 submitted a timely comment letter.

22 12. Although the FEIS and “Updated Report” are significantly deficient substantively and
23 procedurally and fail to comport with SEPA and the GMA, FORC did not file a separate
24 appeal because we cannot afford an attorney. Ms. Bendich handled our MHA appeal *pro*
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1 *bono*. Ms. Bendich, who is FORC's Treasurer, will explain the circumstances and how
2 we became involved in this case.

3 I declare under penalty of perjury of the laws of Wahington that I have personal knowledge of
4 the statements in the Declaration above the se are true and correct.

5 DATED: March 17, 2025 at Seattle, Washington.

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9 LARRY E. JOHNSON

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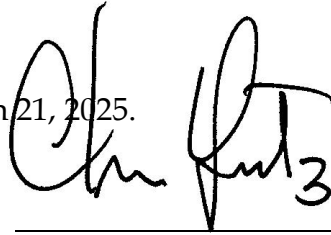
CERTIFICATE OF SERVICE

I certify that on March 21, 2025, I caused a true and correct copy of the foregoing document to be served on the following in the manner indicated below:

1 2 3 4 5 6	Friends of Madison Park c/o Octavia Chambliss 4111 E. Madison #2 Seattle, WA 98112 president@friendsofmadisonpark.com	(X) Via Email () U.S. Mail
7 8 9 10 11	Trevor Cox 1629A 42 nd Ave. E. Seattle, WA 98112 trevor@trevorcox.com Jake Weyerhaeuser 1629B 42 nd Ave. E. Seattle, WA 98112 jweyerhaeuser@gmail.com	(X) Via Email () U.S. Mail
12 13	Hawthorne Hills Community Council 4338 NE 57 th St. Seattle, WA 98105 pj1000@aol.com	(X) Via Email () U.S. Mail
14 15 16 17 18	Toby Thaler P.O. Box 1188 Seattle, WA 98111 toby@thaler.org Jennifer Godfrey P.O. Box 257 ACP #9964 Seattle, WA 98507-0257 plantkingdom1@gmail.com	(X) Via Email () U.S. Mail (X) Via Email () U.S. Mail
19 20 21	Elizabeth E. Anderson, WSBA #34036 Assistant City Attorney liza.anderson@seattle.gov	(X) Via Email () U.S. Mail
22 23	Laura Zippel, WSBA #47978 Assistant City Attorney laura.zippel@seattle.gov	(X) Via Email () U.S. Mail
24 25 26	John M. Cary 3704 S. Ridgeway Pl. Seattle, WA 98144 john.cary@comcast.net	(X) Via Email () U.S. Mail

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DATED: March 21, 2025.



Chris R. Youtz