

BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE

In the Matter of the Appeal by  
JENNIFER GODFREY,

Appellant

From the Office of Planning and Community  
Development's Final Environmental Impact  
Statement on the One Seattle Plan

Nos. W-25-006 (Consolidated for  
Hearing with Nos. W-25-001  
through W-25-005)

APPELLANTS GODFREY'S  
ADDITIONAL WITNESS  
INFORMATION

I. INTRODUCTION

Appellant Jennifer Godfrey submits the following additional witness information to  
comply with paragraph 11 of the March 6, 2025 Prehearing Order.

II. CONFIRMED WITNESSES

A. Expert Witnesses

Following are the witnesses Appellant Godfrey plans to call as experts. All of the  
identified expert witnesses have been asked to provide statements of qualifications in the form of  
a CV or resumé. Only Hoss and Morris have provided a specific document to the undersigned as  
of this filing. Accessible links and copies of other relevant information regarding their  
qualifications are provided to fill the gap in information.

1. David Bain, Ph.D., Orca Conservancy, approximately 1 hour. Dr. Bain will  
testify concerning the negative environmental impacts likely to result from the  
City's proposed actions—increased housing density and failure to prevent loss

1 of urban forest canopy from harming marine life with a focus on the Southern  
2 Resident Killer Whale (SRKW) population of Orcas.

3 2. Keith Roraback, Wastewater Technician. Mr. Roraback is more in the nature of  
4 a fact witness than an expert: he will testify concerning the operation of the  
5 wastewater management and treatment system in Seattle, less than an hour. Mr.  
6 Roraback has no LinkedIn page.

7  
8 3. Joshua Morris, Conservation Manager, Birds Connect Seattle, up to two hours.  
9 Morris's CV is included. In addition, Mr. Morris submitted extensive comments  
10 on the DEIS; his testimony will include his assessment of the adequacy of the  
11 City's responses to those comments.

12  
13 4. Theodore Hoss, Urban Forest Canopy Analyst, approximately one hour. Mr.  
14 Hoss will testify concerning the accuracy of the City's urban forest canopy  
15 analyses. Mr. Hoss has no LinkedIn page.

16  
17 5. Vivek Shandas, Urban Ecologist, up to two hours. Dr. Shandas will testify  
18 about the likely impacts from the City's planned actions and the completeness  
19 and adequacy of the City's proposed mitigation measures. Dr. Shandas' is not  
20 yet in hand; his introduction page at his employer is submitted.

21  
22 6. Water Pollution Analyst TBD, approximately 1 hour. This witness will address  
23 the pollution to surface waters, both lacustrine and oceanic, resulting from  
24 stormwater runoff in Seattle. Appellant Godfrey will provide information on  
25 this planned expert witness if retained prior to the April 14 deadline set forth in  
26 the pre-hearing order.


27 B. Non-expert Witnesses  
28

1 Appellant plans to call up to three non-expert witnesses to testify about the disjunct  
2 between the City’s municipal code provisions regarding urban forest canopy—primary SMC  
3 Chapter 25.11—and the on-the-ground status of the City’s implementation of those provisions.  
4 These witnesses will present evidence based on reviews of the City’s data, reports, and studies  
5 compared to “facts on the ground” to show that Seattle’s urban forest canopy is declining in both  
6 quantity and quality (shifting from larger conifers to smaller deciduous trees). The identity of  
7 these witnesses will be indicated no later than April 14.

9 C. Other Witnesses

- 10 1. Any witnesses listed by other Appellants
- 11 2. Any rebuttal witnesses
- 12 3. Any witnesses listed by the City.
- 13 4. Appellant is also relying on timely City production of responses to discovery in  
14 order to identify specific individuals who worked on relevant portions of the  
15 EIS and supporting documents.  
16  
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18  
19 Dated this 4<sup>th</sup> day of April, 2025

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23  
24 Toby Thaler. WSBA #8318  
25 [toby@thaler.org](mailto:toby@thaler.org)  
26 206 697-4043  
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**CERTIFICATE OF SERVICE**

I certify that on the 4<sup>th</sup> day of April, 2025, I caused a true and correct copy of the foregoing

**Notice of Appearance** to be served on the following in the manner indicated below:

Elizabeth E. Anderson  
Assistant City Attorney  
[liza.anderson@seattle.gov](mailto:liza.anderson@seattle.gov)

Laura Zippel  
Assistant City Attorney  
[laura.zippel@seattle.gov](mailto:laura.zippel@seattle.gov)

John M. Cary  
[john.cary@comcast.net](mailto:john.cary@comcast.net)

Chris R. Youtz  
[chris@sylaw.com](mailto:chris@sylaw.com)

Hawthorn Hills Community Council  
[PJ1000@aol.com](mailto:PJ1000@aol.com)

Trevor Cox and Jake Weyerhaeuser  
[trevor@trevorcox.com](mailto:trevor@trevorcox.com)

Jake Weyerhaeuser  
[jweyerhaeuser@gmail.com](mailto:jweyerhaeuser@gmail.com)

Friends of Madison Park  
Octavia Chambliss  
[president@friendsofmadisonpark.com](mailto:president@friendsofmadisonpark.com)

Dated this 4<sup>th</sup> day of July, 2025.



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Toby Thaler