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OFFICE OF  
HEARING EXAMINER

BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE WASHINGTON

In the matter of the application of

SWEDISH MEDICAL CENTER  
CHERRY HILL

for approval of a Major Institution Master  
Plan for property located at 500 17<sup>th</sup>  
Avenue

In the matter of the appeals of:

WASHINGTON COMMUNITY ACTION  
NETWORK, 19<sup>th</sup> AVE BLOCK WATCH;  
CHERRY HILL COMMUNITY COUNCIL;  
SQUIRE PARK COMMUNITY COUNCIL;  
PATRICK ANGUS, et al.; and  
CONCERNED NEIGHBORS OF SWEDISH  
CHERRY HILL

From a SEPA Decision by the Director,  
Department of Planning and Development

CF 311936

FILE NOS.  
MUP-15-010 (W)  
MUP 15-011 (W)  
MUP 15-012(W)  
MUP 15-013(W)  
MUP 15-014(W)  
MUP 15-015(W)

DPD # 3012953

DECLARATION OF CHRIS GENESE

I, CHRIS GENESE, declare as follows:

1. I work for Washington CAN and I make this declaration based on my own  
personal knowledge. I am over the age of 21 years old.

1           2.       Washington CAN and members of the organization are significantly interested in  
2 and affected by the decision to approve or deny the Swedish Cherry Hill MIMP as well as the  
3 analysis and conclusions in the FEIS for that decision.

4           3.       Washington CAN works to achieve racial, social, and economic justice in our  
5 State. Health care access and affordability have been one of Washington CAN's main issues over  
6 the organization's history. Medical debt and inadequate charity care policies at hospitals such as  
7 Swedish-Cherry Hill Medical Center are bankrupting families and limiting low income  
8 communities from receiving the care they need.

10          4.       Washington CAN has many members who live in the neighborhoods that  
11 immediately surround the Swedish Medical Center MIMP proposal site and several of those  
12 members live and/or own homes just a few blocks away from the site. Washington CAN  
13 members walk and/or drive on the portions of E. Cherry Street, James Street, and the numbered  
14 avenues, 13<sup>th</sup> through 18<sup>th</sup> Avenue, 23<sup>rd</sup> Avenue, and other streets that nearby and that will be  
15 directly impacted by traffic generated by the proposal.

17          5.       Washington CAN members have the same interest in and will suffer the same  
18 impacts and injury as those that the other appellants in this matter have asserted in their appeals.  
19 Namely, the increased traffic, density, height, bulk and scale of the buildings for a residential  
20 neighborhood, lack of meaningful setbacks and transition to the neighborhood all impact the  
21 safety and livability of Washington CAN members' neighborhoods.

23          6.       Washington CAN and its members seek to improve access to healthcare and are  
24 impacted by and interested in ensuring that Swedish strengthens its healthcare accessibility and  
25 affordability at the Cherry Hill campus as part of the expansion. The institution's lack of  
26 investment in local schools, lack of partnership with neighborhood groups to strengthen youth

1 programs, and failure to adequately reach out to communities of color for its educational  
2 offerings are all issues that affect Washington CAN and its members. Washington CAN and its  
3 members will be directly and adversely impacted by the responsible official's failure to  
4 adequately analyze and disclose the human development impacts of the proposal in the FEIS.

5 7. Many members of Washington CAN have health care bills from Swedish that are  
6 beyond what they can afford. They receive calls from collectors demanding payment and find  
7 themselves in the impossible situation of having to choose between buying food and paying their  
8 mortgage or paying these large bills. Swedish Cherry Hill Medical Center's current method and  
9 process for providing charity care is unfair, inadequate, and broken. Swedish has enormous  
10 capacity to increase the amount of charity care that it provides.

11 8. The Final EIS provides a brief and inadequate summary and analysis of this issue.  
12 They fail to note what is specifically attributable to the Cherry Hill campus, they fail to note the  
13 total operating and net revenues of Swedish (and therefore the percentage of charity care  
14 provided), and fail to note that Swedish can afford to do far more for the local community in  
15 charity care in conjunction with this proposed expansion of their facilities. The Final EIS  
16 incorrectly concludes that the Final MIMP is consistent with the Human Health and Development  
17 goals and policies in the Comprehensive Plan. Washington CAN will provide specific evidence  
18 and arguments to demonstrate the inadequacy and inaccuracies in the FEIS discussion of this  
19 issue.  
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23 I declare under penalty of perjury under the laws of the State of Washington that the  
24 foregoing is true and correct.

25 Dated this 14 day of May, 2015, at Seattle, Washington.  
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CHRIS GENESE