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January 31, 2002

VIA HAND DELIVERY

Mr. Kevin L. Stock
Mr. Michael P. Witek
Helsell Fetterman, LLP
1325 Fourth Avenue
Suite 1500
Seattle, WA 98101

Re: Port of Seattle's Supplemental Response to ACC Interrogatory No. 4

Dear Kevin and Mike:

Enclosed is the Port's supplemental response to ACC Interrogatory No. 4, which requested an outline of the prior experience of the Port's designated witnesses as expert witnesses.

Sincerely,

FOSTER PEPPER & SHEFELMAN PLLC

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Enclosure

cc: Traci Goodwin (w/ enclosure)
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ANCHORAGE
Alaska

PORTLAND
Oregon

SEATTLE
Washington

SPOKANE
Washington

The following information is provided as a supplemental response to the Port of Seattle's Objections and Responses to ACC's Interrogatory No. 4, requesting a listing of past experience of the Port's designated expert witnesses in prior court and administrative hearings. Only those experts who have prior experience have been listed.

Joe Brascher; AQUA TERRA CONSULTANTS

Project: Trossachs EIS Review (1995)

Client: Tom Sanderson

Provided testimony during King County administrative proceedings on computer modeling of land development impacts and adjacent wetlands.

Case: Mystic Lake Lawsuit (1995)

Client: Lake Washington School District

Declaration submitted on changes in lake fluctuation due to runoff from school property and computer modeling of land development impacts on the adjacent lake. Case settled before trial proceedings.

Case: Phantom Lake Lawsuit (1999)

Client: Rudy Elmer

Declaration submitted regarding changes in Phantom Lake discharge. Testimony provided on computer modeling of the City of Bellevue's shoreline changes and downstream flooding effects. Case settled before trial.

Case: Airport Communities Coalition v. State of Washington Department of Ecology and the Port of Seattle, PCHB No. 01-160 (2001)

Client: Port of Seattle

Mr. Brascher submitted a declaration in support of the Port's Memorandum Opposing ACC's Motion for Stay.

Charles T. Ellingson; Pacific Groundwater Group

Project: Tacoma Landfill (1990's)

Client: City of Tacoma

Retained to provide technical data for the causes and characteristics of groundwater contamination near the Tacoma Landfill.

Project: Cost and Feasibility Action (1991)

Attorneys: Glenn Tegen and Charlie Dowthwaite

Retained to provide technical data on the cost and feasibility of a remedial action.

Project: Construction Dewatering (1991)

Attorneys: Joel Smith

Retained to provide technical data on the feasibility of construction dewatering.

Project: The Hartford Insurance Group
Attorneys: Gary Boe, Hartford Insurance
Retained to provide technical data on the causes and timing of contamination of sediments with mercury.

Project: City of Redmond (1996)
Client: City of Redmond
Retained to provide technical data on the potential impacts to City wells from urban development.

Project: Water in Wells (1997)
Client: Pat Parks
Retained to provide technical data on the salinity of water in a near-shore well.

Project: Impacts to Groundwater
Client: Citizens for the Protection of Tualco Valley
Retained to provide technical data on the impacts to groundwater supplies from gravel mine expansion.

Project: Groundwater Contamination
Client: Private Gas Station Owner
Retained to provide technical data on the causes of groundwater contamination.

Project: High Groundwater Levels
Client: Lilly Industries
Retained to provide technical data on the causes of high groundwater levels and the effects of construction on groundwater levels.

Charles Wisdom, Ph.D.; Parametrix, Inc.

Dr. Wisdom has not testified before as an expert witness.

Case: Airport Communities Coalition v. State of Washington Department of Ecology and the Port of Seattle, PCBH No. 01-160 (2001)
Client: Port of Seattle
Dr. Wisdom submitted a declaration in support of the Port's Memorandum Opposing ACC's Motion for Stay.

William Dunlay, Jr., Ph.D.; Leigh Fisher & Associates

Case: County of Clark v. Tien Fu Hsu, Las and County of Clark v. Lisa Su Family Trust Vegas, Nevada (September 2000 – July 2001)
Client: Clark County Aviation Department, Las Vegas McCarran International Airport
Provided deposition testimony on the FAA's obstacle clearance standards and criteria and the potential effects of an extended runway and associated aeronautical operations at McCarran

International Airport on the potential for tall structures near the airport. Dr. Dunlay also provided an affidavit on this same standard.

Case: City of St. Louis v. City of Bridgeton, St. Louis City (December 1998 – March 1999)

Client: City of St. Louis, Department of Aviation, Lambert St. Louis International Airport

Retained to provide rebuttal testimony and technical analyses of airport capacity and aircraft delay in response to comments raised by the City of Bridgeton's expert witnesses.

Case: County of Allegheny v. Lang Machinery (September 1997)

Client: County of Allegheny, Pittsburgh International Airport

Provided deposition testimony in an inverse condemnation case about changes in flight procedures at Pittsburgh International Airport as a result of opening a new runway.

Case: County of Allegheny v. John & Kathleen Chromchak (August 1997)

Client: County of Allegheny, Pittsburgh International Airport

Provided deposition testimony in an inverse condemnation case about changes in flight procedures at Pittsburgh International Airport as a result of opening a new runway.

Case: County of Allegheny v. Pitt Hotel (March 1996)

Client: County of Allegheny, Pittsburgh International Airport

Trial testimony in an inverse condemnation case about changes in flight procedures at Pittsburgh International Airport as a result of opening the Midfield Terminal.

Case: County of Allegheny v. Ewings Mill Heights (June 1995)

Client: County of Allegheny, Pittsburgh International Airport

Dr. Dunlay testified before the Board of View of Common Pleas on an inverse condemnation case about changes in flight procedures at Pittsburgh International Airport as a result of the opening of a new runway.

James K. Mitchell, Ph.D., PE

Case: Superfund litigation at the Royal Hardage Site, Criner, Oklahoma (1986-1988)

Attorneys: Mark Coldiron of McKinner, Stringer and Webster, Oklahoma City, OK

Retained by the defendant to be a member of an expert panel. Provided deposition testimony on the compatibility of bedrock and proposed slurry wall materials with waste chemicals at the site.

Case: Raytheon Slurry Wall in Mountain View, California (1994)

Client: Golder Associates, Inc.

Participated as an expert advisor to attorney David A. Dial of Smith, Currie & Hancock, Atlanta GA, during a mediation on excessive ground movements and slurry trench cutoff and wall construction.

Case: Canonie Environmental Services, Inc. v. San Jose Redevelopment Agency (1991-1994)

Attorneys: Thelen, Marrin, Johnson and Bridges
Retained to prepare testimony on the high calcium content of the soil causing unanticipated thickening of bentonite slurry used in cutoff wall construction.

Case: Corps of Engineers, Huntington District (1996)

Attorneys: Shelby Conrad, Corps Office of Counsel
Testified at a mediation on the differing site conditions in connection with construction of the Gallipolis Replacement Lock on the Ohio River.

Case: Corps of Engineers, Huntington District (1996-1997)

Testified as an expert witness on the soil composition and properties in relation to the construction of the Olin Dike in Virginia.

James C. Kelley, Ph.D.; Parametrix, Inc.

Case: Thornton Creek Legal Defense Fund, and Maple Leaf Community Council, City Of Seattle Hearing Examiner – MUP-99-017/018/019 (1999)

Client: Simon Property Group
Provided testimony regarding historical and predevelopment conditions on the Northgate Mall site in support of a general development plan for the site. Dr. Kelley's testimony focused on the historical presence of streams and wetlands on the site, as interpreted from site visits, maps and aerial photographs.

Case: Thornton Creek Legal Defense Fund v. City of Seattle; Simon Property Group, Susan Gving; and the Maple Leaf Community Council. Cause No. 99-2-17841-6SEA (2000)

Client: Simon Property Group
Provided a declaration regarding the existing and historical stream and wetland conditions on the Northgate Mall site.

Case: City of Kirkland Planning Commission Regarding Stream Buffer Requirements and Sensitive Area Ordinance Standards (1999)

Client: Century Pacific, L.P.
Provided testimony on the functions of buffers to small non-fish bearing streams and approaches to improve the buffer functions through a combination of enhancement and development incentives.

Case: Port of Seattle v. RST Enterprises. Cause No. 99-2-27688-5KNT (2001)

Client: Port of Seattle

Case: Airport Communities Coalition v. State of Washington Department of Ecology and the Port of Seattle, PCHB No. 01-160 (2001)

Client: Port of Seattle

Dr. Kelley submitted a declaration in support of the Port's Memorandum Opposing ACC's Motion for Stay.

Paul Fendt, PE; Parametrix, Inc.

Case: State v. Spath
Attorneys: Steve Deitrich, State of Washington Office of Attorney General
Retained by plaintiff to provide expert testimony in support of WSDOT litigation.

Case: State v. Tollefson
Attorneys: Steve Deitrich, State of Washington Office of Attorney General
Retained by plaintiff to provide expert testimony in support of WSDOT litigation. Mr. Fendt provided a declaration

Case: State v. Penelope's
Attorneys: Steve Deitrich, State of Washington Office of Attorney General
Retained to by plaintiff to provide expert testimony in support of WSDOT litigation. Mr. Fendt provided both a declaration and deposition testimony.

Case: State v. Cornett
Attorneys: Steve Deitrich, State of Washington Office of Attorney General
Retained by plaintiff to provide expert testimony in support of WSDOT litigation. Mr. Fendt provided a declaration and deposition testimony.

Case: Jefferson County
Attorneys: Carr Tuttle & Campbell
Provided expert testimony on historic weather patterns and comparisons during a flood event. Both a declaration and deposition testimony were provided.

Case: Taylor v. State
Client: Washington State Department of Transportation
Provided expert testimony on hydrology and on wetland impacts. Mr. Fendt provided both a declaration and deposition testimony.

Case: Airport Communities Coalition v. State of Washington Department of Ecology and the Port of Seattle, PCHB No. 01-160 (2001)
Client: Port of Seattle
Mr. Fendt has submitted multiple declarations in this case.

Michael Riley, PE; S.S. Papadopolous & Associates, Inc.

Case: Georgia-Pacific v AETNA (1995)

Attorneys: Davis Wright Tremaine

Provided deposition testimony on stormwater runoff and water quality issues and on dredging and sediment quality issues.

Case: Travelers v. Ribl ImmunoChem (2001)

Attorneys: Davis Wright Tremaine

Provided deposition testimony on the soil and groundwater contamination.

Norman Crawford, Ph.D.; Hydrocomp, Inc.

Case: Cuyapaipe Band of the Mission Indians v. The United States

Client: Department of Justice

Dr. Crawford was retained by the defendant to provide his opinion on the definition of the surface water resources at five Mission Indian reservations in Southern California. Dr. Crawford provided both a declaration and deposition testimony.

Case: Tompkins v. South Tule Independent Ditch Company

Client: South Tule Independent Ditch Company, Springville, California

Dr. Crawford was retained by the defendant to provide his opinion on the water rights and the effects of diversions from the canal on downstream canal flows. Dr. Crawford provided both a declaration and deposition testimony.

Case: Echeveste Farms v. McCurdy

Client: Echeveste Farms

Dr. Crawford was retained by the plaintiff to provide his opinion on the causes of flooding and the influence of farm levees on the movement and depth of flood waters. Dr. Crawford provided both a declaration and deposition testimony.

Case: Pueblo of Isleta v. The United States

Client: Department of Justice

Dr. Crawford has been retained by the defendant to provide his opinion on the limitations to the productivity of irrigated lands along the Rio Grande in New Mexico. Case is ongoing.

Michael Bailey, PE; Hart Crowser, Inc.

Client: U.S. Department of Justice (May 2000)

Retained as an expert witness to review depositions and records pertaining to claims arising from a construction accident.

Client: M.A. Mortonson Construction Company (1997-1999)

Retained as an expert to provide testimony during arbitration on the review of contract documents and inspector reports for a construction claim pertaining to earthwork.

Client: U.S. Forest Service (October 1997)
Retained as an expert witness to review construction documents related to a CERCLA cost recovery action.

Client: Great Western Chemical Company (1994-1995)
Provided deposition testimony for cost recovery litigation related to the investigation and remediation of soil and groundwater contamination.

Client: King County (June 1994)
Provided testimony related to an abandoned coal mine hazard.

Attorneys: Ulin & Lambe and the City of Anacortes (September 1992)
Retained as an expert witness to provide testimony based on contract documents and an inspector's reports pertaining to earthwork.

Barry Christopher, Ph.D., PE

Case: Bernalux Inc. v. Bentofix Technologies, Inc., Canadian Federal Court No. T-1051-95 (2001 – to present)

Client: Bentofix Technologies, Inc., Smart & Biggar, Ontario Canada
Retained as an expert to review a patent infringement claim.

Case: Perimeter Village Shopping Center, Dunwoody, Georgia (January 2001)

Client: Alston and Bird, LLP Atlanta, Georgia
Retained as an expert to review a report on the reinforced soil retaining wall failure by Law Engineering and Environmental Services, Inc.

Case: Operating Industries, Inc. Landfill, Monterey Park, California (1995-1998)

Client: CDM Federal Programs Corporation, Lenexa, KS
Retained as a member of the US Environmental Protection Agency Technical Review Panel formed to review the work plan and design to meet performance objectives required under a consent degree.

Mary Vigilante, Synergy Consultants, Inc.

Client: City of Chicago
Provided a declaration and deposition testimony on the noise at Chicago's O'Hare International Airport.

Case: The City of Des Moines v. Port of Seattle, Hearing Examiner 96-04 (1997)

Attorneys: Foster Pepper & Shefelman PLLC
Provided a declaration on behalf of the Port of Seattle on the background and preparation of the Final EIS and Final Supplemental EIS, the STIA forecasts, and on how a shorter runway length would not meet the intended need of the project.

John Strunk, Aspect Consulting, LLC

Case: CROWD v. Tacoma Pierce Health Department, PCHB No. 00-045 (2000)
Attorneys: Margaret Archer of Gordon Thomas Honeywell, Malanca, Peterson & Daheim
Provided a declaration and deposition testimony on the source of increased groundwater discharge to a subsurface groundwater collection system and the effect of increased dilution on monitoring for landfill leachate and water quality parameters.

Case: William and Gail Weyerhauser v. Tacoma Pierce Health Department, PCHB No. 00-047 (2000)
Attorneys: Margaret Archer of Gordon Thomas Honeywell, Malanca, Peterson & Daheim
Provided a declaration and deposition testimony on the source of increased groundwater discharge to a subsurface groundwater collection system and the effect of increased dilution on monitoring for landfill leachate and water quality parameters.

Case: State of Vermont v. Mitec Corporation, Burlington Vermont (1985)
Retained to provide technical support in litigation regarding groundwater contamination from chlorinated solvents from a computer parts manufacturing facility.

Case: Cascade Pole, Tacoma, Washington (1996)
Retained to provide technical support in litigation regarding groundwater contamination from chlorinated solvents resulting from historic dry-cleaning practices.

Case: Griffee Drycleaners, Vancouver, Washington (1995)
Retained to provide technical support in litigation regarding groundwater contamination from chlorinated solvents resulting from historic dry-cleaning practices.

Case: Kalama Chemical, Beaufort, South Carolina
Retained to provide technical support in litigation involving groundwater contamination and remediation at a chemical manufacturing plant.

Case: Airport Communities Coalition v. State of Washington Department of Ecology and Port of Seattle, PCHB No. 01-160 (2001)
Client: Port of Seattle
Mr. Strunk submitted a declaration in support of the Port's Memorandum Opposing ACC's Motion for Stay.

Paul Agid, Port of Seattle

Case: Idaho Power Company v. Underwriters at Lloyd's of London (1995)
Client: Idaho Power Company
Mr. Agid was as a fact witness to testify on the details of a CERCLA cleanup.

Case: Commonwealth Aluminum v. Martin Marietta (1993)
Client: Martin Marietta

Provided deposition testimony as an expert witness on the allocation of risk and cleanup facility improvement costs between former and current owners of an industrial facility.

Steven Swenson, PE; R.W. Beck

Case: City of Bellingham vs Lakeview Associates (Case is currently active)
Client: City of Bellingham

Mr. Swenson has been retained by the City of Bellingham as an expert in a condemnation proceeding involving property needed for a surface water infrastructure project. Mr. Swenson has provided both deposition testimony and testified at the hearing on public use and necessity.