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BEFORE THE HEARING EXAMINER
FOR THE CITY OF SEATTLE

In the Matter of the Appeal of:) Hearing Examiner File No. S-15-001
) (DPD Project No. 3020324)
FOSS MARITIME COMPANY)
)
from an Interpretation by the Director, Department)
of Planning and Development.)

_____)
) Hearing Examiner File No. S-15-002
) (DPD Project No. 3020324)
In the Matter of the Appeal of the:)
)
PORT OF SEATTLE,)
)
from Interpretation No. 15-001 of the Director of) SOUNDKEEPER’S EXHIBIT
the Department of Planning and Development.) LIST AND WITNESS LIST
)
)
_____)

In accordance with the Hearing Examiner’s June 3, 2015 Order, Puget Soundkeeper Alliance, Seattle Audubon Society, Sierra Club, and Washington Environmental Council (collectively “Soundkeeper”) respectfully submit the following list of exhibits and witnesses. Pursuant to the Hearing Examiner’s July 27, 2014 Order, Soundkeeper will supplement its exhibit and witness lists on or before August 6, 2014.

1 LIST OF EXHIBITS

2 1. All documents included in the completed record Soundkeeper submitted to, and
3 that was accepted as part of the record by, King County Superior Court in Cause No. 15-2-
4 05143-1.

5 2. Photographs taken by Soundkeeper’s witnesses of Terminal 5’s use by Royal
6 Dutch Shell, Foss Maritime Company, and their contractors.

7 3. Maps of Terminal 5 and the surrounding areas prepared by Soundkeeper’s
8 witnesses showing the impact of the Coast Guard exclusion zone on navigation.

9 4. Port of Seattle and Washington Department of Natural Resources, 1998 Port
10 Management Agreement, Ex. A-1.

11 5. Port of Seattle, Harbor Development Strategy 21, June 6, 2001.

12 6. Governor’s Container Ports Initiative: Recommendations of the Container Ports
13 and Land Use Work Group and Appendices, Jan. 2009.

14 7. Port of Seattle Commission, Meeting Minutes, May 13, 2014.

15 8. Other records produced by the Port of Seattle pursuant to the Washington Public
16 Records Act.

17 9. Jeffrey W. Monroe, Dictionary of Maritime and Transportation Terms (2005).

18 10. Dictionary definitions of Seattle Municipal Code and Seattle Shoreline Master
19 Program terms.

20 LIST OF WITNESSES

21 1. Sue Joerger, Puget Soundkeeper Alliance. Ms. Joerger may present fact
22 testimony on Puget Soundkeeper Alliance’s land-based monitoring of Shell, Shell contractor,
23 and Foss activities at Terminal 5 and will contrast that activity, and the effects of that activity on
24

1 Puget Soundkeeper Alliance’s activities under the prior Terminal 5 use. Soundkeeper anticipates
2 Ms. Joerger’s testimony will take less than 45 minutes.

3 2. Paul Fredrickson, Puget Soundkeeper Alliance. Mr. Fredrickson may present fact
4 testimony on Puget Soundkeeper Alliance’s water-based monitoring of Shell, Shell contractor,
5 and Foss activities at Terminal 5 and will contrast that activity, and the effects of that activity on
6 Puget Soundkeeper Alliance’s activities under the prior Terminal 5 use. Soundkeeper anticipates
7 Mr. Fredrickson’s testimony will take less than 30 minutes.

8 DATED this 28th day of July, 2015.

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