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ENVIRONMENTAL  
HEARINGS OFFICE

The Honorable Bruce Hilyer

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

PORT OF SEATTLE, a port district of the  
State of Washington,

Petitioner,

v.

THE POLLUTION CONTROL HEARINGS  
BOARD, an agency of the State of  
Washington; AIRPORT COMMUNITIES  
COALITION; and CITIZENS AGAINST  
SEATAC EXPANSION,

Respondents,

v.

STATE OF WASHINGTON,  
DEPARTMENT OF ECOLOGY, an agency  
of the State of Washington,

Respondent Below.

NO. 02-2-25658-9 SEA

DECLARATION OF KEVIN L. STOCK IN  
RESPONSE TO PORT OF SEATTLE'S  
APPLICATION FOR DIRECT REVIEW

Kevin L. Stock declares as follows:

1. I am one of the attorneys for the Airport Communities Coalition. I make this  
declaration based upon personal knowledge and am competent to do so.

2. Attached to this Declaration as Exhibit A is a true and correct copy of a letter  
from Dr. Stephen Hockaday to the U.S. Army Corps of Engineers dated April 3, 2002.

DECLARATION OF KEVIN L. STOCK - 1

HELSELL FETTERMAN LLP  
1500 Puget Sound Plaza  
1325 Fourth Avenue  
Seattle, WA 98101-2509

Rachael Paschal Osborn  
Attorney at Law  
2421 West Mission Ave.  
Spokane, WA 99201

ORIGINAL

AR 000013

1           3.       Attached to this Declaration as Exhibit B is a true and correct copy of a letter  
2 from Dr. Stephen Hockaday to the U.S. Army Corps of Engineers dated May 8, 2002.

3           4.       Attached to this Declaration as Exhibit C is a true and correct copy of a letter  
4 from Dr. Stephen Hockaday to the U.S. Army Corps of Engineers dated June 12, 2002.

5           5.       Attached to this Declaration as Exhibit D is a true and correct copy of a letter  
6 from Dr. Stephen Hockaday to the U.S. Army Corps of Engineers dated June 25, 2002.

7           6.       Attached to this Declaration as Exhibit E is a true and correct copy of a letter  
8 from Dr. Stephen Hockaday to the U.S. Army Corps of Engineers dated July 29, 2002.

9           7.       Attached to this Declaration as Exhibit F is a true and correct copy of a letter  
10 from Dr. Stephen Hockaday to the U.S. Army Corps of Engineers dated September 4, 2002.

11           8.       Attached to this Declaration as Exhibit G is a true and correct copy of a letter  
12 from Dr. Stephen Hockaday to the U.S. Army Corps of Engineers dated September 15, 2002.

13           9.       Attached to this Declaration as Exhibit H is a true and correct copy of the  
14 Declaration of Stephen L. M. Hockaday in Support of ACC's Motion for Stay, with  
15 attachments, dated October 7, 2001.

16           10.      Attached to this Declaration as Exhibit I is a true and correct copy of the  
17 Declaration of Senator Julia Patterson, Senator Dow Constantine, Senator Tracey Eide,  
18 Representative Shay Schual-Berke, Representative Karen Keiser, Representative Joe  
19 McDermott, Representative Eric Poulsen, Representative Mark Miloscia, and Representative  
20 Maryann Mitchell, dated October 8, 2001.

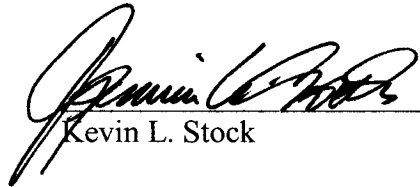
21           11.      Attached to this Declaration as Exhibit J is a true and correct copy of the  
22 Declaration of Sally Nelson, Mayor, City of Burien, dated October 5, 2001.  
23  
24  
25

1           12. Attached to this Declaration as Exhibit K is a true and correct copy of the  
2 Declaration of Robert Olander in Support of ACC's Motion for Stay, dated October 5, 2001.

3           13. Attached to this Declaration as Exhibit L is a true and correct copy of the  
4 Declaration of Robert Sheckler in Support of ACC's Reply on Motion for Stay.

5           I declare under penalty of perjury under the laws of the State of Washington that the  
6 foregoing is true and correct.

7           DATED this 4<sup>th</sup> day of October, 2002, at Seattle, Washington.

9  
10   
11 Kevin L. Stock

12 g:\lu\acc\pchb\appeal-kcsc\decl-creighton-100402.doc





**Pacific Aviation Consulting Inc.**  
PO Box 32, Port Hadlock  
Washington 98339-0032

April 3, 2002

U.S. Army Corps of Engineers  
Regulatory Branch  
PO Box 3755, Seattle, WA 98124-3755  
Attn: Colonel Ralph H. Graves, Ms. Muffy Walker, Ms. Gail Terzi

**Re: Port of Seattle, Ref. No. 1996-4-02325: Supplementary comments to Corps of Engineers, concerning new Port of Seattle air traffic data.**

Dear Colonel Graves, Ms. Walker and Ms. Terzi,

This letter provides newly available air traffic data and other information on behalf of the ACC. The data should be considered by the Corps in its public interest evaluation of the third runway at Sea-Tac, and its review of the need for updated NEPA review of the proposal in light of new information concerning the lack of need for and problems with a third runway at Sea-Tac.

The new information is presented below in the following categories:

1. Port of Seattle data continue to show significant drops in air traffic
2. New FAA forecast shows traffic downturn will be severe and long lasting
3. Airlines continue to have major financial problems
4. The Port is having to divert revenue to resolve security problems
5. The FAA AMASS system will help but not eliminate Sea-Tac safety problems
6. Comparison with San Francisco International Airport.

The data reinforce the continuing lack of need for and problems caused by a third runway.

**1. Port of Seattle data continue to show significant drops in air traffic**

There is no sign of any recovery in aircraft operations for February 2002 at Sea-Tac, according to the latest Port data. Aircraft operations and passengers continue to drop significantly.

Aircraft operations were down by 20.0% in February 2002 compared with February in the peak traffic year (2000). There were 6,655 less aircraft operations in February 2002 (26,655) than in February 2000 (33,310).

Passengers were down by 11.1% in February 2002 compared with February 2000. There were 215,208 less passengers in February 2002 (1,720,907) than in February 2000 (1,936,115).

**AR 000017**

The rate of loss of traffic increased; whether measured from month-to-month or from year-to-year, and whether measured for aircraft operations or for passengers:

- The drop in aircraft operations in February 2002 (20%) was larger than the drop in January 2002 (19%).
- The drop in passengers in February 2002 (11%) was larger than the drop in January 2002 (7%).
- The drop in aircraft operations from February 2001 to February 2002 (16%) was larger than the drop from February 2000 to February 2001 (5%).
- The drop in passengers from February 2001 to February 2002 (7%) was larger than the drop from February 2000 to February 2001 (4%).

The only increase is in the number of passengers carried per aircraft, which has increased considerably between 2000 and 2002. There were 64.6 passengers per aircraft in February 2002, up by 11.1% from the number in February 2000. There were 6.5 more passengers per aircraft in February 2002 (64.6) than in February 2000 (58.1).

Airlines continue to increase average aircraft size and reduce the number of empty seats, thereby increasing the number of passengers per aircraft. As a result, the number of aircraft operations at Sea-Tac remains at very low levels that have not been seen for many years.

Air traffic data are now available for a six month period after September 2001. 166,664 air traffic operations took place in the last six months (from September 2001 to February 2002). This number is 22% less than the 213,601 operations that took place in the same six months during 2000 (the peak traffic year). This 22% represents a drop of 46,937 aircraft operations in half a year.

## **2. New FAA forecast shows traffic downturn is severe and will be long lasting**

FAA recently produced its annual forecast of aviation activity. This forecast is produced at the national level, and forecasts for individual airports are not available.

The forecast shows an anticipated drop in aircraft operations in FY 2002 of 4.5% (total aircraft operations) to 10.8% (air carrier aircraft operations) compared with FY 2001. An annual growth rate of 4.3% (total aircraft operations) to 7.7% (air carrier aircraft operations) is anticipated for FY 2003 compared with FY 2002 as a result of a forecast rapid economic recovery. An annual average growth rate of 1.9% (total aircraft operations) to 2.6% (air carrier aircraft operations) is anticipated for the years FY 2003 to FY 2013 (FAA Aerospace Forecasts FY 2002-2013, Table 1-8).

In its forecast report, FAA noted that 2001 was “a disastrous year and an uncertain future for aviation”, and “an end of the boom times”. (FAA Aerospace Forecasts FY 2002-2013, Page I-1). As FAA noted, “While the terrorist events of September 11<sup>th</sup> are responsible for a large part of the declines witnessed in 2001, other factors, most notably the slowdown in U.S. and world economic

activity, had already set the stage for an end to the growth cycle. The events of September 11<sup>th</sup> were merely the catalyst that pushed aviation over the edge, turning an already bad year into a disastrous year.”

FAA is also concerned about the future, noting that there are many risks and uncertainties that mean that future air traffic levels may be significantly less than those contained in the official forecast (which contained many optimistic assumptions). The risks and uncertainties associated with the forecast include the following sixteen items (quoted directly from the FAA forecast report); each of which would cause air traffic to be significantly less than that contained in the official FAA forecast [FAA quote starts here]:

- a. “The risks inherent in this year’s forecasts are numerous and largely on the negative side. The aviation industry finds itself in uncharted waters where nothing that has gone before has prepared anyone to predict with any certainty what the future has in store for aviation.
- b. “The economic forecasts used to develop this year’s aviation forecasts assume a 2-quarter recession with a very strong recovery starting in late 2002. Should the recession be longer and deeper and the recovery weaker, it could push out the recovery in travel demand for an additional year. DRI-WEFA assigns a probability of 30 percent that the recession will be deeper and longer than predicted.
- c. “One of the major assumptions regarding the recovery of the commercial aviation sector, both in terms of traffic and profitability, is a return of the full-fare business traveler to the levels achieved prior to the start of the current economic recession. The return of business travel is directly dependent on the recovery and strength of future U.S. and world economic activity.
- d. “The current forecast projects a rapid decline in fuel prices in 2002, with only moderate increases forecast over the remainder of the forecast period. If U.S. and world economic activity grows as predicted, energy prices could be considerably higher than forecast. Should this occur, the potential impact on U.S. and world economic growth and air travel could be considerable.
- e. “The strong economic recovery forecast in Asia/Pacific and Latin American countries appears to be overly optimistic. The economy of Japan continues to send mixed signals and Argentina’s economy is in dire straits. If the internal economic problems plaguing their economies are not resolved, the potential for recessions to spread to other Asia and South America countries remains a very distinct possibility. This could significantly slow the traffic recovery forecast in these regions.
- f. “Heightened security measures at U.S. airports have significantly increased the times required for check-in and security clearance. If these lengthy check-in times are allowed to continue, much of the short-distance scheduled air travel could be shifted to other transportation modes or travel alternatives such as teleconferences. The loss of this traffic,

mostly high price business travel, would be devastating to the profitability of U.S. commercial airlines.

- g. "Prominent in everyone's predictions of future aviation demand is the assumption that there will be no more terrorist attacks aimed at U.S. aviation. Yet aviation, because of its high visibility and global reach, has been and will continue to be a target for international terrorism. We assume that the highest levels of security and continuous vigilance will protect the flying public from future acts of terrorism. Aviation cannot expect to return to normalcy until the flying public's confidence in the integrity of our aviation security systems has been fully restored.
- h. "The forecasts prepared by the FAA have assumed, as have many other industry forecasters, that aviation demand will follow a similar path to recovery as noted in previous terrorist or war related incidents, i.e., Pan American's flight 103 in December 1988 and Iraq's invasion of Kuwait in August 1990. In each instance, traffic and revenue growth resumed within a year. However, there are significant differences with the terrorist attacks of September 11<sup>th</sup> and, as such, presents a major risk to achieving the forecasts discussed herein.
- i. "Previous terrorist incidents have generally been singular or isolated in nature and directed against aircraft in international flight or on foreign soil. The impact from previous attacks, though sizable in terms of decreased demand, has generally been regional or route specific in nature. In addition, the overall impact was relatively short in duration, generally lasting less than one year. The difference is that for the first time, terrorists used aircraft as weapons of mass destruction against civilian targets in two of the most important and recognizable cities in the free world. In addition, the capturing of the September 11<sup>th</sup> terrorist attacks on video and their incessant replay on national and world television has created images among the world populace that will not be soon forgotten. And herein lies the major difference between previous terrorist attacks and the events of September 11<sup>th</sup>. The impact to aviation has not been confined to a single market or region; it has affected traffic worldwide. The widely held view appears to be that if terrorists could carry out such attacks on American soil, then no one anywhere is immune to terrorist attacks. And the impact on aviation has been devastating, both in the U.S. and worldwide.
- j. "Following previous terrorist attacks, airlines generally continued to operate the same or slightly reduced schedules. This time, U.S. airlines immediately cut capacity by almost 20 percent. Foreign flag carriers also adjusted schedules to meet drastically reduced passenger demand. Additional restrictions and "no-fly zones" were implemented on the operation of aircraft within the United States, affecting both civilian and commercial aircraft. Heightened security measures and procedures were implemented at U.S. airports, doubling or tripling the time required for check-in and security clearance. All of these actions will have an impact on future aviation activity.
- k. "The forecasts also assume that the long-term relationships inherent in the models used to predict aviation demand have not changed. But what if the traveling public's propensity to

fly has changed? What effects will the increased times required for check-in and security checks have on future travel plans, in particular, those trips of less than 300 miles in distance? If the long-term growth in demand is less than the current forecasts predict, what does this portend for the financial viability of individual carriers and the aviation industry in general?

- l. "Inherent in the current forecasts is the assumption that the commercial aviation industry returns to profitability in 2003. A large part of the profitability equation is based on the assumption that the mix of full-fare business traffic relative to personal travel recovers to previous profitable levels. Concerns for the safety of corporate employees has already led some companies to switch to fractional ownership, corporate aircraft, or on-demand charter flights. Even before September 11<sup>th</sup>, United Airlines had established a separate entity—Avolar—to cater to on-demand business travel utilizing smaller business/corporate aircraft. With 309 aircraft on firm order or option, Avolar plans to be open for business in 2002. The U.S. airline financial crisis in 2001 started as a result of the change in the passenger mix from business to personal. What if business demand does not return or only partially returns to 2001 levels?
- m. "There are some positive signs that point toward a strong recovery in both the commercial and general aviation industries. Chief among them is the projected strong recovery and growth in both the U.S. and worldwide economies and declining real fuel prices throughout the forecast period. However, all economic forecasts contain a number of uncertainties that could cause projected growth to be less than that projected. DRI-WEFA has assumed a probability of 30.0 percent that the recession will be longer and the recovery longer than predicted. A 15.0 percent probability is assumed for its higher growth scenario.
- n. "The economic forecasts used to develop this year's aviation forecasts assume a very strong "V shaped" recovery starting in late 2002. OMB's U.S. GDP forecast assumes seasonally adjusted annual quarterly growth of 3.9 percent for 5 consecutive quarters starting with the 4<sup>th</sup> quarter in FY 2002. What if the U.S. economic rebound takes on the properties of a "W shaped" or "U shaped" recovery? Slower economic growth would not only slow the recovery in the demand for aviation services but would also slow the industry's return to profitability.
- o. "Internationally, the Japanese economy, currently in recession, continues to send mixed signals and a prolonged recession or slow growth could negatively impact the entire region. Argentina's current financial and political crises, already plagued by debt defaults and currency devaluation, could worsen and spread to other regional economies. Additionally, if the economic recovery in the U.S. is less than forecast, this could also negatively impact those Asian and Latin American countries whose economies are dependent on export trade with the United States. The current forecasts assume strong passenger growth for travel between the United States and these regions. Any slowing of demand could seriously inhibit the growth in passenger demand for these two travel areas.

- p. “The political climate regarding proposed mergers and alliances changed dramatically on September 11<sup>th</sup>. The commercial industry’s current financial condition, combined with what appears to be a more favorable climate for consolidation, could witness a spate of proposed mergers and/or alliances over the next several years. While consolidation may improve the financial health of individual carriers and the industry, the fear is that consolidation would lessen competition in many markets. Less competition could mean higher fares to the flying public and lower travel demand.” [FAA quote ends here]

*(Source of above 16 items a through p: FAA Aerospace Forecasts FY 2002-2013, Page I-26 - I-29)*

Even the optimistic FAA forecast growth rates would produce low air traffic levels at Sea-Tac. With the FAA forecast for the last half of the fiscal year, annual operations for FY 2002 would be approximately 360,000, a new low level that has not been seen since 1994. If the optimistic FAA forecast national growth rates (7.7% in 2003 and 2.6% thereafter) were applied at Sea-Tac from this point forward, traffic would then increase to approximately 420,000 by 2006 and approximately 460,000 by 2010. These optimistic future traffic levels are less than both the 460,000 annual capacity of Sea-Tac today and significantly less than the 515,000 annual capacity of Sea-Tac without a third runway that was estimated by FAA in the August 8, 2001 Record of Decision for the practicable do-nothing alternative.

***If one or more of the risks and uncertainties reported by FAA and listed above were to occur, then air traffic would be significantly lower than the amounts forecast.***

Many of the negative events that concerned FAA are already occurring (e.g. increasing fuel prices, declining international economies, reduced short distance flying, and low airline profitability). These negative events are likely to cause lower traffic levels than those forecast.

For example, if the traffic growth rates used in the SEIS were applied to current traffic levels (1.7% through 2005 and 1.3% through 2010), annual traffic at Sea-Tac would be approximately 385,000 in 2006 and 406,000 in 2010. These future traffic levels are significantly less than both the 460,000 annual capacity of Sea-Tac today and the 514,935 annual capacity that was estimated by FAA in the August 8, 2001 Record of Decision for the practicable do-nothing alternative.

### **3. Airlines continue to have major financial problems**

As reported in the Wall Street Journal, on March 21, 2002; airlines continue to have major financial problems.

“Weakness in business air travel slows airline industry recovery... The weak economy - coupled with the time-consuming hassles of travel - continue to depress business travel. Last month, total revenue for major airlines was down 23% compared with February 2001 - the month when the airlines’ economic slide started. Unit revenue, measured as revenue per available seat-mile, was 9.6% lower than a year earlier, according to the Air Transport

Association, and traffic was down about 11%. The number of domestic travelers flying on full-fare or first-class tickets was down about 20%.”

“Demand is out there, but at tragically low prices. No one can make money at these prices,” said Robert Baker, vice chairman of AMR Corp.’s American Airlines.

“For airlines, high-fare business travel is important for ending the enormous flow of red ink. Business fares have remained relatively steep, while leisure fares have been slashed, because airlines don’t believe they can stimulate much new business travel with lower prices, especially in a weak economy. What’s more, long lines at airports, lengthy check-in requirements and slimmed down flight schedules have made business travel less productive.

“As a result, “the business traffic environment is incredibly weak,” said Michael W. Gunn, American’s executive vice president of marketing and planning.

“The February revenue numbers, just released by the ATA, point to improvement from December and January, when total revenue was down about 27% in both months. Traffic has steadily recovered, and prices have firmed a bit. But the industry has run into very weak comparisons from a year ago, and analysts say some of the weakness is masked. Moreover, what recovery there has been in the airline industry has trailed the rebound of the overall economy.

“The market has been too focused on trend and too little focused on level,” says UBS Warburg analyst Samuel Buttrick. “It is only against the worst data points on record that the current results can be described as good.”

“Earlier this week, Delta Air Lines Chief Executive Leo Mullin said his airline, based in Atlanta, expects to have losses of at least \$375 million in the first quarter this year. Continental Airlines, Houston, which like most carriers expects a big loss in the first quarter, said it has “reduced our expectations for a return to profitability” in the second quarter.” (*Wall Street Journal, March 21, 2002*)

Air traffic declined nationwide in the five months after September 11, 2001, and Sea-Tac had a larger decline than most large hub airports. According to the New York Times:

“Air Traffic Is Off Almost Everywhere, but the Dip Is Uneven”

“In the five full months after the Sept. 11 attacks, the number of flights at the nation's 31 major hub airports declined by 12.2 percent from the corresponding period the year before. (*New York Times, March 12, 2002*).

Sea-Tac traffic dropped nearly twice this average nationwide drop. Air traffic operations at Sea-Tac in the last six months (from September 2001 to February 2002) were 22% less than in the same six months during 2000 (the peak traffic year).

“Affected the worst was Reagan National Airport, which was shut completely until early October. Next-worst was Los Angeles International, which lost 22.5 percent of commercial operations, followed by La Guardia, at 21.1 percent, and Kennedy, at 21.0... Others on the East and West Coasts, including those at San Francisco, Boston and Seattle-Tacoma, fared badly.” (*New York Times*, March 12, 2002).

At Sea-Tac and elsewhere, the airlines continue to lose money.

“The Air Transport Association, which represents the major carriers, said today that losses exceeded \$7 billion in 2001, about \$4 billion more than had been expected before Sept. 11 because of a recession-related slump in air travel. Airlines parked or retired 350 planes after Sept. 11, the association said, including 101 Boeing 727's, by far the largest category idled.” (*New York Times*, March 12, 2002).

Low demand, low fares, and partly empty aircraft combine to produce severe financial problems for the airlines.

#### **4. The Port is having to divert revenue to resolve security problems**

Passenger delays at Sea-Tac have increased significantly due to new security screening requirements.

“According to Port calculations, before Sept. 11 people averaged eight seconds to pass through security checkpoints. Since Sept. 11, the average is now about 35 seconds.” (*Seattle Times* March 7, 2002)

This change has caused passenger screening capacity to drop to less than 25% of its previous level, causing large delays.

“Because United and Alaska share a security checkpoint, there is the potential for long lines to clear security... Travelers should plan to arrive at the airport two hours before their flights depart.” (*G. Lindsey, Director of Aviation, Port of Seattle Press Release* March 19, 2002)

As a result, the Port is having to expend significant amounts of revenue on security upgrades.

“The Port of Seattle is adding as many as 11 additional metal detectors and X-ray machines at the airport's checkpoint for C and D concourses, a project expected to be completed by June 1, airport spokesman Bob Parker said.” (*Seattle Times*, March 07, 2002)

The first expenditure of approximately one million dollars is for concourses C and D.

“The \$950,000 expenditure will fund purchase of the following equipment: 8 Rapiscan x-ray machines, of the type used at concourse checkpoints, 20 Ceia brand walk-through



metal detectors, and Iontrack brand explosive detectors.” *(Port of Seattle Press Release March 12, 2002)*

Additional expenditures will double screening capacity by 2004.

"We're working right now to double the screening capacity of our checkpoints." *(Port of Seattle Press Release March 19, 2002)* "Expansions are planned for all security checkpoints and, by 2004, airport staff plans to nearly double the number of security checkpoint lanes airport-wide." *(Port of Seattle Press Release March 6, 2002)*

As screening capacity dropped to 25% of its previous level, the Port's plan to double screening capacity will only restore screening capacity to 50% of its previous levels. Large expenditures will result in lower levels of service that will not be achieved until 2004.

New security concerns have reversed previous priorities. Large delays are in the terminal building, not on the runways. Funds are being diverted to meet security needs. Passenger levels of service in the terminal building will be lower in 2004 than in 2000, and many passengers are choosing to drive or not to travel.

#### **5. The FAA AMASS system will help but not eliminate Sea-Tac safety problems**

The FAA Airport Movement Area Safety System (AMASS) is an initiative designed to address safety problems at airports, including those with large numbers of aircraft crossing active runways. FAA is installing AMASS at Sea-Tac.

FAA defines a runway incursion as "Any occurrence at an airport involving an aircraft, vehicle, person, or object on the ground, that creates a collision hazard or results in the loss of separation with an aircraft taking off, intending to take off, landing, or intending to land." FAA has recognized that runway incursions are a major safety problem.

The FAA safety publication "Aviation News" (February 2000 issue on runway incursion safety issues) stated "Runway incursions are a people problem. Whether an air traffic controller makes a mistake and puts two aircraft on the same runway, or an airline or general aviation pilot lands on the wrong runway or taxis onto a runway without permission... people are involved in and cause this problem, and until people stop making these kinds of mistakes, we are going to have runway incursion problems."

Sea-Tac has had several significant problems with runway incursions in the past few years.

AMASS is designed to visually and aurally prompt tower controllers to respond to situations which potentially compromise safety. ASDE - Airport Surface Detection Equipment provides a picture of the runway and the aircraft on it. AMASS is a system attached to the ASDE to alert controllers of potential conflicts. Thirty-four airports will be getting this technology.

The Aviation Subcommittee of the House Transportation and Infrastructure Committee held a hearing on AMASS and other topics on June 22, 2001. A number of problems were identified, including:

“ The version of AMASS that is currently being commissioned has been described as a shadow of its former self. The system has failed to achieve much of the capability that was originally intended. Due to problems with frequent nuisance alerts, which would have desensitized controllers to AMASS alerts in general, the FAA has had to turn off AMASS’ warning capability for ‘side-impact’ collisions. This is because AMASS has no way of knowing the intent of an aircraft or ground vehicle that is approaching a runway from an intersecting taxiway... AMASS was sounding many warnings even when there was no cause for alarm. To eliminate the nuisance alerts... the FAA had to modify AMASS so that it now only looks at single runways, and ignores possible side-impact collisions from intersecting taxiways or runways until an unauthorized aircraft or vehicle has virtually entered the runway in question. At that point, there may not be enough time between the AMASS alert and the point of impact to avoid a collision.” (*Air Safety Week, 07/09/01*)

As a result of these types of problems, AMASS will not eliminate all of the runway incursion problems at Sea-Tac.

With its two closely spaced parallel runways, approximately 40% to 50% of aircraft using Sea-Tac must taxi across an active runway between the runway and the terminal building. A third runway would approximately double the number of taxiing aircraft that would cross active runways and also double the risk of incursions and collisions between aircraft. AMASS would not eliminate the runway incursion problems that would occur with a third runway at Sea-Tac.

#### **6. Comparison with San Francisco International Airport.**

In its March 5, 2002 letter to the Corps, the Port is dismissive of the need to learn from the steps being taken by a multi-agency task force to consider the potential benefits and impacts of alternative ways of improving airport capacity in the San Francisco region. The multi-agency task force is raising a number of issues and concerns in San Francisco that have not been adequately addressed in Seattle.

Contrary to the first SFO-related statement in the March 5 letter, consideration of these same issues and concerns in Seattle would likely result in termination of plans to build a third runway at Sea-Tac (and proper evaluation and selection of a different alternative that would meet the project purpose and need without many of the adverse impacts associated with a third runway).

The Port correctly states that the Port has not changed the proposed project since the Port defined it many years ago. However, the Port does not recognize the changed circumstances that now exist; with regard to significantly lower demand, additional costs and other impacts not identified when the proposed project was defined, and new alternatives identified by FAA and others that meet the project purpose and need without requiring construction of a third runway. Proper

consideration of the proposed project in the light of the new information now available would likely result in the Port changing the proposed project to avoid construction of a third runway.

In its second SFO-related statement in the March 5 letter, the Port incorrectly states “there has never been any suggestion that Master Plan Update development actions were required because of safety problems”. In fact, some project actions were specifically proposed to overcome safety problems. In the EIS purpose and need statement, purpose #3 of 4 states “Provide Runway Safety Areas (RSAs) that meet current FAA standards.” (FEIS, Page II-7).

None of the four existing runway safety areas for Runways 16L-334R and 16R-34L met FAA safety standards, and FAA mandated that the Port upgrade these safety areas to overcome their safety-related deficiencies. In the EIS, The Port states “ Federal Aviation Regulations (FAR) 139, and subsequent acceptance of a grant to maintain an existing runway, mandates that the Port of Seattle bring the RSA’s for 16L/34R into compliance with FAA standards.” (FEIS, Page II-7). These standards were put in place because of “aircraft overruns and incidents a airports” occurring with existing RSAs. (FEIS, Page II-7)

The proposed third runway project compromises safety in several areas, (airspace conflicts, runway crossings, vertical drops, and wind shear potential hazards) as documented in previous letters to the Corps.

Contrary to the third SFO-related statement in the March 5 letter, the delay attributable to current conditions has not been addressed in the FEIS, SEIS, and FAA ROD’s. Each of these documents is out of date because they do not consider the current conditions (that include significantly lower demand, additional costs and other impacts not identified when the proposed project was defined, and new alternatives identified by FAA and others that meet the project purpose and need without requiring construction of a third runway). Passenger delays are now concentrated in the terminal building at security inspection stations, not on the runways.

In its fourth SFO-related statement in the March 5 letter, the Port incorrectly states that “the no action alternative has been thoroughly considered and the Master Plan Update development actions have been designed to minimize discharges of fill water into the waters of the United States.” In fact, FAA identified a new no action alternative in its August 8, 2001 ROD that meets the purpose and need and which has not been thoroughly considered by the Port, even though it eliminates all discharge of fill water into the waters of the United States, and also eliminates all wetland filling.

Therefore none of the four SFO-related statements made by the Port are correct. The lessons to be obtained from examining the multi-agency review of alternatives for the San Francisco region are valuable, and if followed would likely result in changing the proposed project to avoid construction of a third runway.

**Conclusions**

The latest available Port of Seattle traffic data continue to show significant drops in air traffic, and the new FAA forecast shows that the downturn in air traffic will be severe and long lasting.

Airlines continue to have major financial problems, and the Port is having to divert revenue to resolve security problems at Sea-Tac. AMASS is helpful but will not eliminate all safety problems at Sea-Tac. Lessons from the multi-agency review in San Francisco demonstrate that many low impact alternatives to an additional runway exist.

A third runway is not needed nor in the public interest in this environment. There are many alternatives that would better serve the need for aviation efficiency and passenger service than spending more than a billion dollars on a third runway that has limited utility and questionable safety.

Sincerely,

*(see following page)*

Dr. Stephen Hockaday


**Conclusions**

The latest available Port of Seattle traffic data continue to show significant drops in air traffic, and the new FAA forecast shows that the downturn in air traffic will be severe and long lasting.

Airlines continue to have major financial problems, and the Port is having to divert revenue to resolve security problems at Sea-Tac. AMASS is helpful but will not eliminate all safety problems at Sea-Tac. Lessons from the multi-agency review in San Francisco demonstrate that many low impact alternatives to an additional runway exist.

A third runway is not needed nor in the public interest in this environment. There are many alternatives that would better serve the need for aviation efficiency and passenger service than spending more than a billion dollars on a third runway that has limited utility and questionable safety.

Sincerely,



Dr. Stephen Hockaday

**EXHIBIT**

**AR 000030**

**Pacific Aviation Consulting Inc.**  
PO Box 32, Port Hadlock  
Washington 98339-0032

May 8, 2002

U.S. Army Corps of Engineers  
Regulatory Branch  
PO Box 3755, Seattle, WA 98124-3755  
Attn: Colonel Ralph H. Graves, Ms. Muffy Walker, Ms. Gail Terzi

**Re: Port of Seattle, Ref. No. 1996-4-02325: Supplementary comments to Corps of Engineers, concerning new Port of Seattle air traffic data.**

Dear Colonel Graves, Ms. Walker and Ms. Terzi,

This letter provides newly available air traffic data and other information on behalf of the ACC. The data should be considered by the Corps in its public interest evaluation of the third runway at Sea-Tac, and its review of the need for updated NEPA review of the proposal in light of new information concerning the lack of need for and problems with a third runway at Sea-Tac.

The new information is presented below in the following categories:

1. Port of Seattle data continue to show significant drops in air traffic.
2. Airline financial problems make new capital improvements too expensive.
3. Safety problems with runway crossings further reduce the value of a third runway.

The data reinforce the continuing lack of need for and problems caused by a third runway.

**1. Port of Seattle data continue to show significant drops in air traffic**

There is no sign of any recovery in aircraft operations for March 2002 at Sea-Tac, according to the latest Port data. Aircraft operations and passengers continue to drop significantly.

Aircraft operations were down by 18.1% in March 2002 compared with March of the peak traffic year (2000). There were 6,603 less aircraft operations in March 2002 (29,952) than in March 2000 (36,555).

Passenger demand continues to drop. Passengers were down by 6.3% in March 2002 compared with March 2000. There were 142,031 less passengers in March 2002 (2,128,731) than in March 2000 (2,270,762).

The rate of loss of traffic increased from year-to-year, both for aircraft operations and for passengers:

**AR 000031**

- The drop in aircraft operations from March 2001 to March 2002 (15%) was larger than the drop from March 2000 to March 2001 (3%)
- The drop in passengers from March 2001 to March 2002 (5.8%) was larger than the drop from March 2000 to March 2001 (0.4%)

The only increase is in the number of passengers carried per aircraft, which has increased considerably between 2000 and 2002. There were 71.1 passengers per aircraft in March 2002, up by 11.1% from the number in March 2000. There were 9 more passengers per aircraft in March 2002 (71.1) than in March 2000 (62.1).

Airlines continue to increase average aircraft size and reduce the number of empty seats, thereby increasing the number of passengers per aircraft. As a result, the number of aircraft operations at Sea-Tac remains at very low levels that have not been seen for many years.

Air traffic data are now available for a six-month period after September 2001. 168,981 air traffic operations took place in the last six months (from October 2001 to March 2002). This number is 20% less than the 211,919 operations that took place in the same six months during 2000 (the peak traffic year). This 20% represents a drop of 42,938 aircraft operations in half a year.

Similar declines occurred when measured in terms of flights per day. In March 2002, an average of 966 flights occurred each day, 18% lower than the 1,179 flights per day that occurred in the same month in the peak traffic year (March 2000).

The greatest number of flights per day occurred in the peak traffic month of August 2000, when an average of 1,344 flights occurred each day. The March 2002 average of 966 flights per day is 28% lower than the 1,344 flights per day that occurred during August 2000.

Port data continue to show that passengers and air traffic remain at low levels that have not been experienced for many years.

Extrapolating these 18% to 28% drops in flight operations shows that annual traffic levels in the near term are expected to be significantly less than the levels forecast by the Port. Extending the 20% drop experienced in the last six months to a full year would result in approximately 355,000 aircraft operations at Sea-Tac in FY2002, which is equivalent to more than 7 years of lost traffic growth.

Forecasts for 2002 of 409,000 aircraft operations ("New Forecast") and 466,000 ("Case 2") were contained in the SEIS (Table D-1, Page D-2), and a forecast of 460,000 was contained in the FAA August 8, 2001 ROD (Page A7, 2000 TAF) [Interpolation between 2000 and 2005]. These SEIS and FAA forecasts are now shown to be overestimates by 15% to 30% when compared with real traffic levels. When these overestimates are removed from the forecast, it is clear that a third runway is not justified.



**2. Airline financial problems make new capital improvements too expensive.**

“The top eight U.S. airlines reported another \$2.4 billion in losses this week on top of 2001's record \$9 billion shortfall as air travel, although rebounding, is still a shadow of its former self following the Sept. 11 attacks.

“The lucrative business traveler, from which big airlines derive as much as two-thirds of their profit, is either flying less or booking cheap fares. Revenues shrank by about a quarter from year-ago levels at some big airlines, less at others.

“Revenues are way below our costs,” said UAL Corp. President Rono Dutta, summing up the industry's predicament. On Friday, UAL, parent of United, reported a \$510 million net loss, while smaller America West Holdings Corp. posted a \$358 million net loss and Alaska Air Group Inc. a \$34 million loss...

“UAL projected a significant second-quarter loss, however, as did No. 3 Delta Air Inc. and AMR Corp., parent of American Airlines and the world's largest airline. UAL's stock is 50 percent below pre-Sept. 11 levels and the carrier has yet to resolve outstanding labor issues. It is still trying to negotiate a deal with ramp and customer service workers after narrowly avoiding a strike by mechanics in March.” *(Reuters, April 19, 2002)*

“The challenge for the carriers remains yield, which measures the profitability of each seat filled, a question apart from how many seats are filled. In February, for instance, yield was down 14 percent compared to the year before, according to the Air Transport Association, based in Washington, D.C. That's causing many of the major air carriers to continue to lose money, such as Delta Airline's \$4 million loss in the first quarter of this year.

“Carriers like Delta can't continue to lose \$4 million a quarter. Something's got to give,” said Mike Boyd, president of The Boyd Group, an airline consultant near Denver.

“George Hamlin, senior vice president for Global Aviation Associates in Washington, D.C., said the major carriers' reduction in service levels since Sept. 11, such as meals, has diminished the differentiation from discount carriers and attracted business travelers.

“Every frill or perk that was reduced, tended to make the supposedly full-service carrier more like the discounter,” he said, calling it potentially “a nail in the coffin” for some carriers.” *(Puget Sound Business Journal, April 19, 2002)*

US airlines suffered a drop in load factor in April.

“Major U.S. airlines reported on Thursday they filled a smaller percentage of seats in April as more flights since the Sept. 11 hijackings met softer demand and a March Easter holiday made year-ago comparisons tough.

“Load factors, which measure the percentage of seats airlines fill, were expected to decline in April from a year ago as Easter and Passover holidays fell in March this year rather than April.

“American Airlines parent AMR Corp., the world's largest carrier, Continental Airlines, the No. 5 U.S. carrier, and low-cost leader Southwest Airlines, the No. 7 carrier, all reported load factor declines.

“And Houston-based Continental said estimated unit revenue, a measure of financial performance watched closely throughout the industry, fell 10 percent to 12 percent in April from a year earlier. The result was slightly weaker than anticipated, analysts said, and could force estimates for the second quarter to be lowered. It was the first month-to-month decline in Continental's unit revenue estimates since a drop following the attacks...

“Industry systemwide unit revenue is seen down 9 percent to 10 percent in April, compared with an 8.4 percent drop in March, Linenberg wrote.

“Major carriers tried and failed several times to raise leisure fares systemwide in April, prompting worries over when losses will turn to profit.

“Susan Donofrio, senior U.S. airline analyst at Deutsche Bank Securities, wrote in a research note that she cut second-quarter earnings-per-share estimates for Continental to a 20-cent loss from a 20-cent profit and lowered 2002 estimates to a \$1.50 loss from a \$1.10 loss specifically due to the unit revenue estimates.

“There is a 10 percent to 15 percent downward bias on second-quarter earnings per share for the airline stocks group that Deutsche Bank Securities covers, Donofrio added. However, year-to-year comparisons will get much easier from May as the sector began its drop before the attacks, she said.” *(Reuters, Friday, May 3, 2002)*

Even stronger carriers such as Alaska and Southwest are suffering, as more seats are flown empty:

For Alaska “The percentage of available seats occupied by fare-paying passengers for the month was 68.1 percent, compared to 69.6 percent in April 2001... “Horizon's percentage of available seats occupied by fare-paying passengers was 57.9 percent, compared to 59.3 percent last April.” *(Puget Sound Business Journal; May 3, 2002)*

“Alaska Air Group Inc. on Friday reported a \$34.4 million first-quarter net loss, joining other carriers in reporting losses as the industry copes with weak travel demand following the Sept. 11 attacks.

"The No. 9 U.S. carrier, parent of Alaska Airlines and regional carrier Horizon Air with mainly West Coast routes, reported a loss of \$1.30 per share, compared with a loss of \$33.1 million, or \$1.25, a year ago... Operating revenue dropped 3.7 percent from a year earlier to \$497 million in the first quarter." (*Reuters, April 21, 2002*)

"Southwest Airlines Co., one of the few airlines to remain profitable after September 11, said on Thursday that its load factor, a measure of seats filled on the average, for April fell to 66.3 percent from 71 percent a year ago. The seventh largest U.S. airline reported a 3.1 percent decrease in revenue passenger miles, or traffic, to 3.7 billion while capacity increased 3.7 percent to 5.6 billion available seat miles. In March, Southwest reported a 70.2 percent load factor." (*Reuters, Friday, May 3, 2002*)

The above paragraphs demonstrate that the airlines serving Sea-Tac continue to have significant revenue problems that affect their ability to pay for capital improvements.

### **3. Safety problems with runway crossings further reduce the value of a third runway**

NTSB has recommended changes to ATC rules to overcome the safety problems that occur when aircraft taxi across multiple runways, such as is envisioned with a third runway at Sea-Tac. If implemented, these changes will further reduce the value of a third runway by reducing the capacity of a three-runway Sea-Tac.

"Safety First: FAA to Study NTSB Recommendations. Would eliminating the practice of "Taxi into Position and Hold" (TIPH) and changing to new rules for runway crossings make for safer U.S. airports? What would be the impact on airport capacity, efficiency, and controller workload?"

"In the summer of 2002, the Federal Aviation Administration (FAA) will study, through a simulation at NASA FutureFlight Central, the impact of adopting two National Transportation Safety Board (NTSB) recommendations: "Taxi into Position and Hold" (TIPH) and new rules for runway crossings that would eliminate "implied" crossings.

"FAA researchers will evaluate the controller human factors and validate airport capacity predictions involved in these changes..."

"Current practice allows controllers to taxi aircraft into position and then hold. FutureFlight will evaluate the TIPH procedure, simulating the NTSB recommendation that the FAA "discontinue the practice of allowing departing aircraft to hold on active runways at nighttime or at any time when ceiling and visibility conditions preclude arriving aircraft from seeing traffic on the runway in time to initiate a safe go-around maneuver." (Safety Recommendation A-00-69)

"FutureFlight will also study the NTSB recommendation that all runway crossings be "authorized only by specific air traffic control clearance" and that "when aircraft need to cross multiple runways, air traffic controllers issue an explicit crossing instruction for each runway after the previous runway has been crossed." (Safety Recommendations A-00-67 and A-00-68)." (*NASA FutureFlight Central Quarterly Newsletter VOLUME 2, ISSUE 2, April 2002*)

U.S. Army Corps of Engineers

May 8, 2002

Page 6

These safety recommendations of the National Transportation Safety Board would have a significant adverse impact on the performance of Sea-Tac with a third runway. Aircraft taxiing to and from a third runway must cross existing Runways 16L-34R and 16R-34L. To accommodate the new NTSB procedures and air traffic control instructions, the taxi crossings would delay aircraft using all three active runways.

At night and in poor weather conditions (the conditions for which the third runway was proposed), the NTSB recommended ATC procedures would "discontinue the practice of allowing departing aircraft to hold on active runways"; "require that all runway crossings be authorized only by specific air traffic control clearance"; and require that "when aircraft need to cross multiple runways, air traffic controllers issue an explicit crossing instruction for each runway after the previous runway has been crossed."

With these new procedures in place to overcome existing safety flaws, the capacity of the existing Sea-Tac runways will be reduced by operation of a third runway. The efficiency gains claimed for a third runway would not be obtained.

### Conclusions

- The latest available Port of Seattle traffic data continue to show significant drops in air traffic. Traffic levels are now 15% to 30% below those contained in the Port SEIS and FAA ROD forecasts.
- Continuing airline financial problems require that all unnecessary new capital expenditures be eliminated to ease their burden.
- Safety problems with runway crossings and ATC procedures further reduce the value of a third runway.

Any air traffic need for a third runway has vanished. Airlines cannot afford expensive capital expenditures. Safety problems cause capacity losses for the existing runways if a third runway is built. Filling wetlands and altering watersheds in this environment is counter-productive, especially when there are better and cheaper alternatives that do not cause harm. A third runway is not in the public interest.

Sincerely,

  
Dr. Stephen Hockaday

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**AR 000037**

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June 12, 2002

U.S. Army Corps of Engineers  
Regulatory Branch  
PO Box 3755, Seattle, WA 98124-3755  
Attn: Colonel Ralph H. Graves, Ms. Muffy Walker, Ms. Gail Terzi

**Re: Port of Seattle, Ref. No. 1996-4-02325: Supplementary comments to Corps of Engineers, concerning new Port of Seattle air traffic data.**

Dear Colonel Graves, Ms. Walker and Ms. Terzi,

This letter provides newly available air traffic data and other information on behalf of the ACC. The data should be considered by the Corps in its public interest evaluation of the third runway at Sea-Tac, and its review of the need for updated NEPA review of the proposal in light of new information concerning the lack of need for and problems with a third runway at Sea-Tac.

The new information is presented below in the following categories:

1. Port of Seattle data continue to show significant drops in air traffic.
2. Continuing airline financial problems will reduce demand and make new capital improvements too expensive.
3. NTSB focus on new safety procedures will reduce the capacity of all three Sea-Tac runways if a third runway is built.
4. Reduced FAA separations in upper airspace will speed aircraft to Sea-Tac.
5. Low-cost Denver runway shows that Sea-Tac third runway is not cost-effective.
6. Airlines are starting to establish a presence across the region.

The data reinforce both the continuing lack of need for and the problems caused by a third runway.

**1. Port of Seattle data continue to show significant drops in air traffic**

There is no recovery in aircraft operations for April 2002 at Sea-Tac, according to the latest Port data. Aircraft operations and passengers continue to drop significantly.

Aircraft operations were down by 16.4% in April 2002 compared with April of the peak traffic year (2000). There were 5,879 less aircraft operations in April 2002 (30,035) than in April 2000 (35,904).

**AR 000038**

Passenger demand continues to drop. Passengers were down by 6.4% in April 2002 compared with April 2001 (the year with the highest April traffic). There were 145,802 less passengers in April 2002 (2,119,665) than in April 2001 (2,264,747).

The rate of loss of traffic increased from year-to-year, both for aircraft operations and for passengers:

- The drop in aircraft operations from April 2001 to April 2002 (-12%) was larger than the drop from April 2000 to April 2001 (-5%)
- The drop in passengers from April 2001 to April 2002 (-6%) was larger than the change from April 2000 to April 2001 (1%)

The only increase is in the number of passengers carried per aircraft, which has increased considerably between 2000 and 2002. There were 70.6 passengers per aircraft in April 2002, up by 13.2% from the number in April 2000. There were 8 more passengers per aircraft in April 2002 (70.6) than in April 2000 (62.3).

Airlines continue to increase average aircraft size and reduce the number of empty seats, thereby increasing the number of passengers per aircraft. As a result, the number of aircraft operations at Sea-Tac remains at very low levels that have not been seen for many years.

Similar declines in aircraft operations occurred when measured in terms of flights per day. In April 2002, an average of 1001 flights occurred each day, 16% lower than the 1,197 flights per day that occurred in the same month in the peak traffic year (April 2000).

The greatest number of flights per day occurred in the peak traffic month of August 2000, when an average of 1,344 flights occurred each day. The April 2002 average of 1,001 flights per day is 26% lower than the 1,344 flights per day that occurred during August 2000.

Port data continue to show that passengers and air traffic remain at low levels that have not been experienced for many years.

## **2. Continuing airline financial problems will reduce demand and make new capital improvements too expensive.**

Airline chief executives have stated that the industry will need to shrink by a third before profitability returns.

“Airline Industry Needs to Downsize, Analysts Say.

“SHANGHAI -- Airline chief executives, meeting Sunday as a group for the first time since the Sept. 11 attacks, face further losses on top of last year's \$17 billion unless they shrink the industry by a third, analysts said.

“British Airways, AMR Corp.'s American Airlines and other major carriers won't return to profitability by trying to fill their planes and win market share with low ticket prices as they are now, said Chris Tarry, an airline analyst at Commerzbank.

"It's a simple issue of supply and demand, but it's one that airlines have failed to address for 50 years," Tarry said. "This is an industry that's been suffering from mass delusion about productivity and costs." The airline industry's profit margin averaged just 3% from 1947 to 2000, even before the Sept. 11 attacks cut air travel by a third and led to losses that were greater than all the profit ever generated by airlines in the history of flying.

“While carriers are working to reduce costs to cope with the fall in demand, firing more than 10% of staff worldwide, they need to embrace fundamental change, said Rigas Doganis, an industry consultant and former chief executive of Greece's Olympic Airways.

"The traditional airline network model isn't sustainable," Doganis said. "It's overextended. The big airlines need to reduce their short-haul operations and the smaller ones need to cut back on long-haul flying."

“The industry needs to be reduced by at least 30% in terms of seating capacity to achieve sustainable profits, said Tarry, the Commerzbank analyst...

“The International Air Transport Assn.'s outgoing director general, Pierre Jeannot, has told airlines they can't blame their situation entirely on Sept. 11. Even before the attacks the industry had been expected to post a \$2.5-billion loss last year.

"CFOs should have been more vigilant and insisted on more actions being taken to prepare for the storm," he said." (*Bloomberg News, June 3, 2002*)

The airlines have failed repeatedly in their attempts to raise fares, and their revenues do not meet their expenses.

“Latest Air Fare Hike Fails, AMR Warns.

“The third attempt by financially struggling U.S. airlines to raise airfares since the Sept. 11 attacks failed after Continental Airlines (news - web sites) Inc. over the weekend rescinded its hike of late last week.

“Continental, based in Houston, had tried to raise leisure fares by \$20 roundtrip, but No. 4 rival Northwest Airlines (news - web sites) failed to go along. In the airline industry, fare hikes never stick unless rivals agree to charge the same prices on competing routes. After several days, No. 5 Continental then pulled its higher fares out of computer reservation systems.

“That's good news for consumers, but not for the nation's airlines whose losses have reached epic proportions -- about \$9 billion in 2001 and counting.



"The third attempt since mid-April to raise leisure fares by \$20 roundtrip, which Continental Airlines initiated May 30, now is officially a bust," said Tom Parsons, chief executive of bestfares.com. "A \$20 differential per ticket is plenty of money to prompt a family of four to switch to a competing carrier. American, Delta or Continental couldn't afford to give their competitors this big of an advantage."..

"AMR Corp., parent of American Airlines, TWA and American Eagle, sent out an ominous warning late Friday for the investors and the rest of the industry. The Dallas/Fort Worth-based carrier said its "significant" second-quarter loss will represent a slower rate of recovery than took place in the first as a key measure of performance lags.

"While it had already predicted a second-quarter loss and potentially for the year overall, AMR said the drop in its unit revenue, also called revenue per available seat mile, was falling behind that of the rest of the industry.

"Coming from the world's largest carrier, such news indicated that the lingering effects on air travel from the Sept. 11 attacks continue nearly a year after the four commercial airliners were hijacked and crashed. ..

"Domestic unit revenue was down 12.8 percent in April, a reversal of the year's previously improving trend.

"Several airline analysts on Wall Street recently have predicted ongoing financial shortfalls not only for this year but for 2003 as well." (*Reuters, June 3 2002*)

The above paragraphs demonstrate that the airline industry continues to have significant revenue and over-capacity problems that will both reduce future demand and affect airline ability to pay for capital improvements.

### **3. NTSB focus on new safety procedures will reduce the capacity of all three Sea-Tac runways if a third runway is built.**

NTSB has recommended changes to ATC rules to overcome the safety problems that occur when aircraft taxi across multiple runways. NTSB safety changes will cause delay for aircraft using a third runway at Sea-Tac, and will also reduce third runway capacity. Not only will the capacity of a third runway be reduced, but the capacity of the existing runways will also be reduced by a third runway, because aircraft must cross the existing runways to get to a third runway.

"The House Transportation Committee has passed legislation to require the Transportation Department to file annual reports on its response to each safety board recommendation. Since its creation in 1967, the board has issued 11,885 recommendations, and 81.6 percent have been followed.

“We are encouraged by the progress that we have seen in the acceptance rate of our recommendations,” Blakey said. “However, the board will continue to push federal and state government agencies, industry and private companies for more safety improvements to enhance our transportation system for the benefit of all Americans.”

“The board's... most-wanted safety improvements for 2002 include... Preventing airplanes, vehicles or people from entering airport runways by mistake. “We're afraid the next major accident will be on the ground, not in the air, in aviation,” Blakey said.

*(Associated Press, May 15, 2002)*

FAA is conducting studies with NASA on the impact of the NTSB recommendation that all runway crossings be "authorized only by specific air traffic control clearance" and that "when aircraft need to cross multiple runways, air traffic controllers issue an explicit crossing instruction for each runway after the previous runway has been crossed." (Safety Recommendations A-00-67 and A-00-68).” *(NASA FutureFlight Central Quarterly Newsletter VOLUME 2, ISSUE 2, April 2002)*

This continuing NTSB concern about aircraft crossing active runways is likely to result in new ATC procedures that will further reduce any capacity gains claimed for a third runway at Sea-Tac. Unlike today's procedures that were assumed in the third runway proposal, the new procedures require aircraft to receive specific controller authorization to cross each of the existing runways when taxiing to and from a third runway.

These new procedures were not envisaged when a third runway was proposed, and they result not only in reduced efficiency for a third runway, but also loss of efficiency of both existing runways.

#### **4. Reduced FAA separations in upper airspace will speed aircraft to Sea-Tac.**

FAA recently announced its plan to implement reduced separations between aircraft that will increase the capacity of the airspace feeding Sea-Tac.

“FAA Proposes New Rule to Add Capacity at High Altitudes.

“The U.S. Department of Transportation's Federal Aviation Administration (FAA) issued a proposed rule today that would significantly increase capacity and operating efficiency at high altitudes. The proposal would reduce the minimum vertical separation between aircraft from the current 2,000 feet to 1,000 feet for all aircraft flying between 29,000 and 41,000 feet, thus allowing more airplanes in the same volume of airspace.

“Implementing Reduced Vertical Separation Minima (RVSM) will increase the routes and altitudes available and lead to more efficient routings that will save time and fuel.

“Implementing RVSM is a major effort in our overall plan to increase capacity by 30 percent over the next decade,” FAA Administrator Jane F. Garvey said.

“The FAA proposes to implement RVSM in December 2004. By then, the agency estimates, more than 90 percent of flights between 29,000 and 41,000 feet will be made by RVSM-compliant aircraft.” *(FAA May 10, 2002)*

This initiative is part of an FAA program that will use new technologies and air traffic control procedures to significantly increase the capacity of airports around the country, including Sea-Tac.

#### **5. Low-cost Denver runway shows that Sea-Tac third runway is not cost-effective.**

Good airport planning (and protection of public resources and funds) is best served by siting runways and airports where they can be built and expanded cost-effectively and without significant operating constraints.

In Denver, good airport planning made adequate provision for increasing airport capacity. A sixth runway is now under construction at Denver International Airport, at a cost of \$166 million.

Denver’s new runway will be nearly twice as long and a third wider than a third Sea-Tac runway. The new Denver runway will only cost one fifth as much as a Sea-Tac third runway and will not cause any of the substantial harm that would be caused by a new Sea-Tac runway.

The lack of good airport planning and the lack of availability of land for airport development at Sea-Tac means that space is not available for cost-effective airport development, and that alternative solutions must be found that meet aviation needs without causing wetland fill and other harm.

The \$780 million cost of Sea-Tac’s proposed third runway would build 5 new runways at Denver prices. The more than \$3 billion dollars proposed by the Port to be spent trying to upgrade Sea-Tac could be used to fund better regional solutions that meet long-term aviation needs.

“DIA's sixth runway getting off the ground.

“Next week, Denver International Airport will begin pouring concrete for one of the largest runways in the world.

“The 16,000-foot-long and 200-foot-wide runway will enable DIA to operate more efficiently during winter storms, allow long-haul flights to carry more weight, handle the next generation of super-jumbo jets and possibly even lure more international airlines.

“And with a \$166 million price tag, experts say, DIA's sixth runway is a huge bargain. Some other U.S. airports are spending up to \$1.1 billion apiece on new runways...

“DIA is fortunate because it's merely paying the cost of building a runway and not the added expense of buying homes and mitigating noise like other airports, said Marchi, the Airports Council International official”... *(Denver Post, May 15, 2002)*

The lack of foresight at Sea-Tac means that low cost runways that do not cause harm cannot be built at Sea-Tac and other alternatives must be considered as part of regional long-term planning.

#### **6. Airlines are starting to establish a presence across the region.**

As the region grows, airlines start to examine better ways to serve regional needs. Several airlines have considered service from Paine Field. Now one cargo carrier is opening a freight-sorting hub in Chehalis.

“Airborne opening a sorting hub in Chehalis.

“The airline subsidiary of Seattle-based air-express courier Airborne Inc., ABX Air Inc., will open a new regional sorting facility in Chehalis. ABX hauls airborne freight for package carrier Airborne Express.

“The regional facility is leased for three years from the Port of Chehalis. It is ABX's 10th in the country, and provides improved logistics and capacity to accommodate growth in the Pacific Northwest region. The 30,000-square-foot sort facility will employ 15 immediately, the Port of Chehalis said in an announcement.

“ABX Air operates a fleet of more than 100 airplanes from its other regional hubs in Pennsylvania, Rhode Island, Virginia, Georgia, Florida, Missouri, Michigan, Texas and California. Its primary hub is in Wilmington, Ohio, where the airline subsidiary is headquartered.”  
*(Puget Sound Business Journal, May 14, 2002)*

This sorting hub will allow Airborne to spread its air traffic among Portland, Sea-Tac, and other regional airports. There are many airports in the Puget Sound region that are now or can be used for aircraft operations instead of at Sea-Tac. This dispersal of traffic across the region can reduce demand at Sea-Tac and thereby avert any need for a third runway.

#### **Conclusions**

New data continue to show that a third runway at Sea-Tac is not needed, expensive, and would cause significant harm.


- The latest available Port of Seattle traffic data continue to show significant drops in air traffic.
- Airline financial problems reduce demand and make new capital improvements too expensive.
- NTSB focus on new safety procedures will reduce the capacity of all three runways if a third runway is built.
- Reduced FAA separations in upper airspace will speed aircraft to Sea-Tac.
- Low-cost Denver runway shows that Sea-Tac third runway is not cost-effective.
- Airlines are starting to establish a presence at other regional airports.

U.S. Army Corps of Engineers  
June 12, 2002  
Page 8

There is no air traffic need for a third runway. Airlines are in financial trouble and must reduce operations and avoid expensive capital expenditures. NTSB safety concerns will reduce the benefit of a third runway.

Filling wetlands and altering watersheds in this environment is counter-productive, especially when there are better and cheaper alternatives that do not cause harm. A third runway is not in the public interest.

Sincerely,



Dr. Stephen Hockaday

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**AR 000046**

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June 25, 2002

U.S. Army Corps of Engineers  
Regulatory Branch  
PO Box 3755, Seattle, WA 98124-3755  
Attn: Colonel Ralph H. Graves, Ms. Muffy Walker, Ms. Gail Terzi

**Re: Port of Seattle, Ref. No. 1996-4-02325: Supplementary comments to Corps of Engineers, concerning Port of Seattle letters dated March 6 and March 21 2002.**

Dear Colonel Graves, Ms. Walker and Ms. Terzi,

This letter provides responses on behalf of the ACC to information contained in Port of Seattle letters to the U.S. Army Corps of Engineers dated March 6 and March 21 2002. The data should be considered by the Corps in its public interest evaluation of the third runway at Sea-Tac, and its review of the need for updated NEPA review of the proposal in light of new information concerning the lack of need for and problems with a third runway at Sea-Tac.

The response is presented below in the following categories:

1. Contrary to assertions in the March 21, 2002 Port of Seattle letter, air traffic at Sea-Tac is not recovering to previous levels; and neither future air traffic demand nor poor weather delays require a third runway.
2. Contrary to assertions in the March 6, 2002 Port of Seattle transmittal; a two-runway Sea-Tac will meet regional aviation needs with (or without) a one-runway supplemental airport.

The assertions in the Port letters do not change the reality that there is a continuing lack of need for a third runway, and that third runway would cause wetland fill and other adverse impacts.

**1. Contrary to assertions in the March 21, 2002 Port of Seattle letter, air traffic at Sea-Tac is not recovering to previous levels; and neither future air traffic demand nor poor weather delays require a third runway.**

The March 21, 2002 Port letter discusses only passengers, and ignores aircraft operations which are the relevant factor for runway use. The evidence shows that air traffic operations declined during 2001 and early 2002, and remain at depressed levels.

**AR 000047**

Passenger traffic dropped by 1,372,408 in the calendar year 2001, down 4.8% for the year compared with 2000. In the first quarter of 2002, 491,769 fewer passengers flew in or out of Sea-Tac than in the same quarter of 2000, a drop of 8.1%.

**Drop in Sea-Tac Passengers By Quarter**

<u>Quarter</u>	<u>Months</u>	<u>% Drop in Passengers from 2000</u>
1	Jan -Mar 2001	- 0.9 %
2	Apr-Jun 2001	0.3%
3	Jul -Sep2001	- 5.0%
4	Oct-Dec2001	-13.9%
5	Jan -Mar 2002	- 8.1%

*(Source: Port of Seattle Aviation Activity Report)*

The number of aircraft operations dropped at an even faster rate than the drop in passenger activity. Prior to September 11, air traffic at Sea-Tac was already dropping; with approximately 5% less aircraft operations in the summer of 2001 than in the summer of 2000. The events of September 11 caused an even larger loss, with a drop of 21.7% in traffic in the fourth quarter of 2001 and 19.1% in the first quarter of 2002. These figures are shown in the following tabulation.

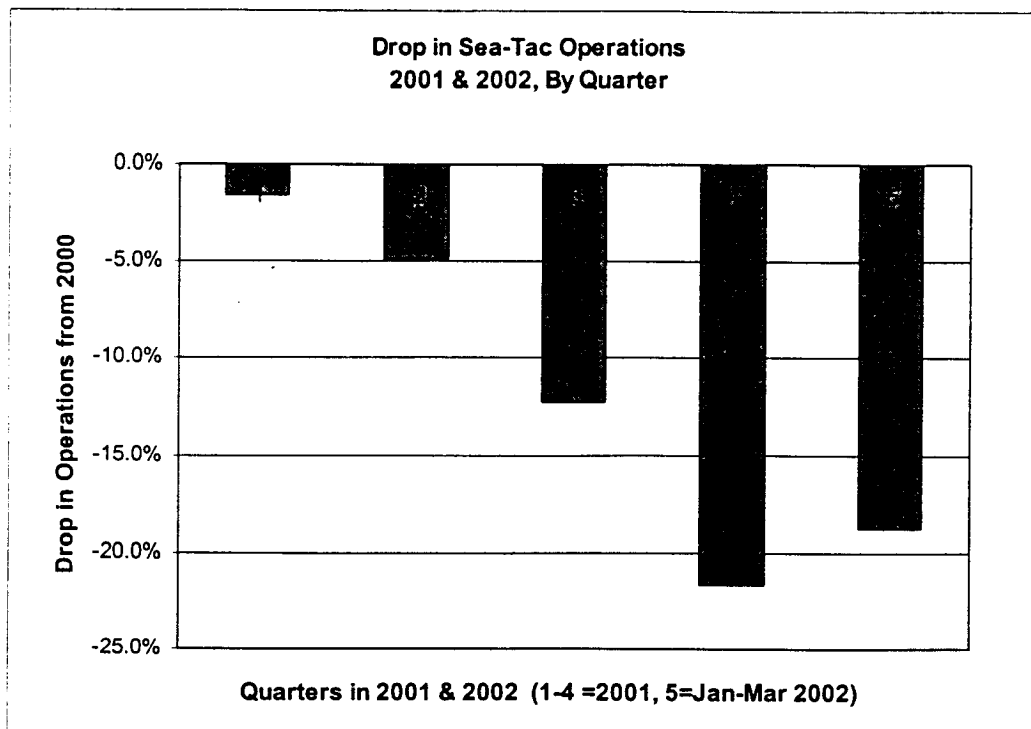
**Drop in Sea-Tac Aircraft Operations By Quarter**

<u>Aircraft Operations</u>	<u>2000</u>	<u>2001/2002</u>	<u>Change</u>	<u>% Change</u>
Q1 Jan – Mar 2001	104,229	102,658	-1,571	- 1.5%
Q2 Apr – Jun 2001	112,685	107,229	-5,456	- 4.8%
Q3 Jul – Sep 2001	121,073	106,297	-14,776	-12.2%
Q4 Oct – Dec 2001	107,690	84,366	-23,324	-21.7%
Q5 Jan – Mar 2002	104,229	84,615	-19,614	-19.1%

*Source: Port of Seattle Aviation Activity Report*

The drop in aircraft operations in 2001 and 2002 is illustrated in the following chart, which shows the percent loss in aircraft operations at Sea-Tac (compared with the 2000) for each of the four quarters of calendar year 2001 and the first quarter of 2002.





In January 2002, the Port released a revised forecast projection of 385,000 aircraft operations that demonstrates the lack of need for a third runway. (*Third Runway Program Update, Port of Seattle Commission Briefing, January 22, 2002*) If the Port's revised forecast projection for 2002 is correct, the SEIS forecast of 423,400 operations for 2002 is wrong and overstates demand by 10%.

However, it is likely that the Port's forecast projection is overly optimistic. Data on actual traffic operations in the fourth quarter of 2001 and the first quarter of 2002 show a drop of 20% compared with traffic in 2000 (and not the 10% drop suggested by the Port). If this 20% drop continues (as the data above indicate), the traffic level for 2002 would be 356,500. Compared with this 356,500 level, the lowest value since 1995, the SEIS forecast of 423,400 operations for 2002 is even more inaccurate, and overstates demand by 19%.

The latest Port traffic and forecast data shows that the forecast contained in the SEIS is both out of date and an overestimate by nearly 20%. Reducing the SEIS forecast to correct this overestimate removes any justification for a third runway.

The SEIS forecast shows operations growing at an average annual growth rate of 1.5% through 2010. (*SEIS Table 1-2*). When the SEIS forecast growth rate of 1.5% in annual aircraft operations is applied to the projected 2002 traffic (356,500 based on current traffic data or 385,000 based on the January 22, 2002 Port projection), then the forecast for 2010 varies from 401,000 aircraft operations using current traffic data to 433,700 using the latest Port projection.

As a result, this updated traffic forecast for 2010 of 401,000 to 433,700 annual aircraft operations is significantly lower than the forecast in the SEIS, and significantly lower than any of the:

1. Traffic levels achieved in 1999 and 2000 (443,700 and 445,700),
2. Capacity of the airfield reported in the SEIS (460,000)
3. Capacity of the airfield reported in the FAA ROD (500,000+)

Note that the FAA recognizes that the forecast referred to in the Port March 21, 2002 letter is likely to be an overestimate, because of 16 risks and uncertainties that were identified by FAA *(and listed in the Hockaday 04/03/02 letter to the Corps)*.

**2. Contrary to assertions in the March 6, 2002 Port of Seattle transmittal; a two-runway Sea-Tac will meet regional aviation needs with (or without) a one-runway supplemental airport.**

With its March 6, 2002 transmittal, the Port includes a March 4, 2002 letter to the Port from Synergy.

The Synergy letter contains a number of faulty assertions that are discussed below. These faulty assertions do not alter the conclusion that a two-runway Sea-Tac will meet regional aviation needs either with the two runways that exist today, or in combination with a supplemental airport.

a. First, Synergy asserts without attribution or justification that "... planners would be appropriately ridiculed for suggesting a single runway system" for a supplemental airport.

The Synergy argument is apparently as follows:

1. Planners would be ridiculed for suggesting a single runway supplemental airport.
2. Planners should suggest a two-runway supplemental airport.
3. A two-runway supplemental airport is infeasible.
4. No supplemental airport is feasible.
5. New runways should be built at Sea-Tac.
6. Planners would be ridiculed for suggesting two more runways at Sea-Tac.
7. The Port should build one more runway at Sea-Tac.

This argument does not match Port and FAA data, and none of these assertions appears to be valid. The Port states that the capacity of Sea-Tac is 460,000 (SEIS), and the FAA states that the capacity of the two Sea-Tac runways will increase to in excess of 500,000 (FAA ROD 8/8/01). FAA also states that "...19,100 annual passenger aircraft operations could be accommodated at existing airports within the region." (ROD Page A10) These figures show that FAA and the Port believe that demand will be less than capacity at Sea-Tac in 2010, and that only 19,100 aircraft operations will likely move to a supplemental airport such as Paine Field to improve Sea-Tac efficiency. These figures show that no third runway is needed, and that a single-runway supplemental airport would accommodate any overflow traffic. (As noted above, demand is now expected to be significantly lower than previously expected by the Port and FAA.)

The Synergy assertion that supplemental airports are infeasible also does not appear to be valid. Synergy appears to base this assertion on the 1990's PSRC studies, which are now completely out of date. These PSRC studies could not and did not anticipate the current drop and change in character of

aviation demand, the new security needs, the financial condition of the airlines, nor the unanticipated added cost and impacts of a third Sea-Tac runway. The PSRC studies were driven by the then-prevailing political circumstances, and also did not properly recognize the possibility of using existing airports in the region such as Paine Field or McChord AFB. The Corps conducted site visits at some of these airports, and concluded that promising sites for a supplementary airport included McChord AFB and other regional airports. (04/30/01 Army Corps of Engineers Muffy Walker Field Visit Memorandum For Record)

b. Synergy also asserted "As competition for passengers and associated air service exists between supplemental airports, the O&D demand must reach and exceed 10 million O&D enplanements before competing airports can succeed financially."

The Synergy argument is apparently as follows:

1. Traffic must grow to 10 million passengers before building a supplemental airport.
2. This growth will not occur within the planning horizon.
3. The Port and Sea-Tac will compete with rather than cooperate with a supplemental airport
4. A supplemental airport should not be operated within the planning horizon
5. Significant growth will occur at Sea-Tac
6. A runway must be built at Sea-Tac to accommodate the significant growth.

This argument does not appear to be consistent with currently available information. In 2000, more than 28 million passengers used Sea-Tac (*Port Activity Data*), and it is likely that any arbitrary 10 million enplaned passenger criterion will be met by the end of the planning period. The Port has pledged to cooperate rather than compete with PSRC in making developments to meet regional aviation demand. As shown above, there is adequate runway capacity to accommodate demand at Sea-Tac without a third runway.

c. Synergy also asserted "...supplemental airports compete for air service such that more activity could be generated than might exist at a single airport. Therefore the sizing of a supplemental airport should consider these dynamics and not underestimate the amount of land that might be required."

The Synergy argument is apparently as follows:

1. Regional and master plan forecasts are wrong - more traffic will occur with a supplemental airport.
2. The additional traffic will not fit at Sea-Tac plus a single-runway supplemental airport.
3. Planners should suggest a two-runway supplemental airport.
4. A two-runway supplemental airport is infeasible.
5. One runway should be built at Sea-Tac.

This argument also does not appear to be consistent with currently available information. There is no evidence to support the contention that regional demand will be higher with a supplemental airport; nor is there evidence to support the contention that Sea-Tac in combination with a single runway supplemental airport would be incapable of accommodating any such higher demand.

d. Synergy also asserted "...development of a replacement or supplemental airport would still not address the underlying need for the third runway at Sea-Tac – the poor weather arrival stream constraint."

The Synergy argument is apparently as follows:

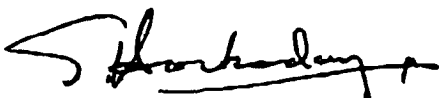
1. Sea-Tac has a poor weather arrival stream constraint.
2. Aircraft would continue to use Sea-Tac rather than a supplemental airport, and thereby get delayed.
3. A third runway would eliminate the delays.
4. FAA and the Port would do nothing to reduce Sea-Tac delays if a third runway is not built.
5. A third runway eliminates the need for a supplemental airport.

Again, this argument does not appear to be consistent with currently available information. Analysis has demonstrated that poor weather constraints would occur 2.8% of the time, and not the 44% suggested by the Port (*Hockaday 11/19/01 letter to the Corps*). There is no evidence that aircraft would refuse to use a supplemental airport, especially if any delays occurred at Sea-Tac. A third runway is not effective at Sea-Tac for a variety of reasons including airspace constraints, runway threshold stagger, runway crossing problems, and inadequate spacing and aircraft operational dependence between runways (*Hockaday 2/16/01 letter to the Corps*). The FAA August 8, 2001 FAA ROD has presented a new practicable alternative to the third runway (*Hockaday 11/19/01 letter to the Corps*). As stated in the Synergy 3/4/02 letter, "The PSRC effort noted that a third runway at Sea-Tac would not satisfy the demand for air travel in perpetuity, that at some point a supplemental airport might be required." Therefore a supplemental airport will be needed even if a third runway is constructed.

A more accurate analysis would be as follows:

1. The current drop in demand and operations means that there is no need to move quickly to build a runway at any site.
2. Safety and efficiency problems (including those associated with crossing two active runways to get to a third runway) negate the value of a third runway at Sea-Tac.
3. FAA has defined a practicable alternative to a third runway that uses technology and procedures.
4. Wetland fill and other adverse environmental impacts can now be avoided.
5. The increasing costs of a new runway can be saved and re-deployed to uses in the public interest.
6. The need for a supplemental airport is recognized both by PSRC and the Port, even if a third runway is built at Sea-Tac.
7. When a supplemental airport is available, a third Sea-Tac runway is not needed.
8. Construction of a third runway should not proceed.
9. A new planning study should be undertaken to redirect efforts to reflect new realities.

Sincerely,



Dr. Stephen Hockaday

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**AR 000053**

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July 29, 2002

U.S. Army Corps of Engineers  
Regulatory Branch  
PO Box 3755, Seattle, WA 98124-3755  
Attn: Colonel Ralph H. Graves, Ms. Muffy Walker, Ms. Gail Terzi

**Re: Port of Seattle, Ref. No. 1996-4-02325: Supplementary comments to Corps of Engineers, concerning new Port of Seattle air traffic data.**

Dear Colonel Graves, Ms. Walker and Ms. Terzi,

This letter provides newly available air traffic data and other information on behalf of the ACC. The data should be considered by the Corps in its public interest evaluation of the third runway at Sea-Tac, and its review of the need for updated NEPA review of the proposal in light of new information concerning the lack of need for and problems with a third runway at Sea-Tac.

The new information is presented below in the following categories:

1. Port of Seattle data continue to show significant drops in air traffic.
2. Horizon Airlines continues to reduce aircraft operations.
3. Delays at Sea-Tac are reducing.
4. New FAA Advisory Circular highlights wind shear and wake safety problems.
5. Washington Senate Transportation Committee acts on new regional airport.
6. Airlines are continuing to establish a presence at airports across the region.

The data reinforce both the continuing lack of need for and the problems caused by a third runway.

**1. Port of Seattle data continue to show significant drops in air traffic**

There is no recovery in aircraft operations either for May or for June 2002 at Sea-Tac, according to the latest Port data. Aircraft operations and passengers continue to drop significantly in both months. Information is provided below separately for May and June 2002.

Traffic Drop in May 2002. Aircraft operations were down by 17.2% in May 2002 compared with May of the peak traffic year (2000). There were 6,513 less aircraft operations in May 2002 (31,468) than in May 2000 (37,981).

**AR 000054**

Similar declines in aircraft operations occurred when measured in terms of flights per day. In May 2002, an average of 1015 flights occurred each day, 17% lower than the 1,225 flights per day that occurred in the same month in the peak traffic year (May 2000).

Passenger demand continued to drop in May. Passengers were down by 7.8% in May 2002 compared with May 2000 (the peak traffic year). There were 187,643 less passengers in May 2002 (2,224,257) than in May 2000 (2,411,900).

The rate of loss of traffic in May accelerated from year-to-year, both for aircraft operations and for passengers:

- The drop in aircraft operations from May 2001 to May 2002 (-13%) was larger than the drop from May 2000 to May 2001 (-4%)
- The drop in passengers from May 2001 to May 2002 (-7%) was larger than the drop from May 2000 to May 2001 (-1%)

The only increase in May is in the number of passengers carried per aircraft, which has increased considerably between 2000 and 2002. There were 70.7 passengers per aircraft in May 2002, up by 11.3% from the number in May 2000. There were 7 more passengers per aircraft in May 2002 (70.7) than in May 2000 (63.5).

The greatest number of flights per day occurred in the peak traffic month of August 2000, when an average of 1,344 flights occurred each day. The May 2002 average of 1,015 flights per day is 23% lower than the 1,344 flights per day that occurred during August 2000.

Traffic Drop in June 2002. Aircraft operations were down by 17.8% in June 2002 compared with June of the peak traffic year (2000). There were 6,896 less aircraft operations in June 2002 (31,904) than in June 2000 (38,800).

Similar declines in aircraft operations occurred when measured in terms of flights per day. In June 2002, an average of 1063 flights occurred each day, 18% lower than the 1,293 flights per day that occurred in the same month in the peak traffic year (June 2000).

Passenger demand continues to drop in June. Passengers were down by 5.1% in June 2002 compared with June 2001 (the peak traffic year). There were 138,142 less passengers in June 2002 (2,578,910) than in June 2000 (2,717,022).

The rate of loss of traffic increased from year-to-year, both for aircraft operations and for passengers:

- The drop in aircraft operations from June 2001 to June 2002 (-13%) was larger than the drop from June 2000 to June 2001 (-5%)
- The drop in passengers from June 2001 to June 2002 (-6%) was larger than the change from June 2000 to June 2001 (0%)

The only increase in June is in the number of passengers carried per aircraft, which has increased considerably between June 2000 and June 2002. There were 80.8 passengers per aircraft in June 2002, up by 15.4% from the number in June 2000. There were 11 more passengers per aircraft in June 2002 (80.8) than in June 2000 (70.0).

Airlines continue to increase average aircraft size and reduce the number of empty seats, thereby increasing the number of passengers per aircraft. As a result, the number of aircraft operations at Sea-Tac remains at very low levels that have not been seen for many years.

The greatest number of flights per day occurred in the peak traffic month of August 2000, when an average of 1,344 flights occurred each day. The June 2002 average of 1,063 flights per day is 21% lower than the 1,344 flights per day that occurred during August 2000.

Port data continue to show that passengers and air traffic remain at low levels that have not been experienced for many years.

## **2. Horizon Airlines continues to reduce aircraft operations.**

As shown in the May and June traffic data above, airlines continue to reduce operations, in part by replacing large numbers of small aircraft by smaller numbers of larger aircraft. This reduction is in response to the continuing poor financial condition of the airline industry. For example, Horizon and its Alaska parent corporation had an operating loss of \$6.8 million in the second quarter of 2002. (*Puget Sound Business Journal*, July 22, 2002)

Horizon Airlines continues to change its fleet to achieve these economies, as evidenced by the following article in the *Puget Sound Business Journal*:

“Horizon Air tweaks efficiency between Seattle, rural cities

“Seattle-based Horizon Air, the regional carrier owned by Alaska Air Group Inc., said it will upgrade the size of the planes it uses on routes between Seattle and Bellingham, Pasco and Eugene, Ore. At the same time, it will reduce the total number of flights on those routes each day.

“Horizon said beginning Sept. 1 it will switch the planes used on certain flights on those routes to 70-seat Q400s, from the current 37-seat Q200.

“Between Seattle and Bellingham, total seats available per day will increase by 29, while the number of flights each way will be reduced from eight to seven. Between Seattle and Pasco, total seats available per day will decrease by four, while flights each way will go from eight to seven. The Seattle/Eugene route also will reduce its total seats by four, with total flights decreasing from six to five.

“Horizon said the moves make more seats available for the busiest flights of the day, and reduces the number of empty seats on other flights.” *Puget Sound Business Journal* 14:17 EDT Friday 7/12/02



This trend started at the beginning of 2001, and has continued ever since, reducing the number of aircraft operations by increasing aircraft size and load factor (the percent of seats occupied). This action by Horizon illustrates the way that airlines serving Sea-Tac plan to continue increasing aircraft size and reducing aircraft operations in the future, thereby further reducing air traffic demand at Sea-Tac.

### **3. Delays at Sea-Tac are reducing.**

As traffic continues to reduce at Sea-Tac, delay to aircraft also reduces. Recent data from the US DOT Bureau of Transportation Statistics (BTS) confirms this trend.

Special care needs to be taken in interpreting BTS data because the data overestimate aircraft delays. For example, BTS data for Sea-Tac arrival delays include delays that occur at other airports, include delays that occur for causes not related to the airport, and exclude over half the aircraft serving Sea-Tac. Actual Sea-Tac delays are significantly less than shown by BTS.

Even with these limitations, the data clearly show that the number of arriving aircraft being delayed halved, and the average amount of delay per aircraft dropped by more than four fifths from May 2000 to May 2002.

*(Source: [http://www.bts.gov/ntda/oai/SummaryStatistics/DEMO/SummaryStatistics/dest\\_summary.cfm](http://www.bts.gov/ntda/oai/SummaryStatistics/DEMO/SummaryStatistics/dest_summary.cfm))*

These Sea-Tac data match conditions around the country.

“Airlines' on-time statistics improve.

“Flying may be more of a hassle today, but at least the airlines and airports are getting better at making the planes arrive and depart on time. According to records, the airlines in 2002 posted the best on-time numbers for the first four months of a year since 1995, and posted the fewest cancellations during that period... The Federal Aviation Administration defines a delay as 15 minutes or more behind schedule.

"There's not much we can do about arrivals," said Louis Miller, executive director of the Hillsborough County Aviation Authority. "Those are problems outside our control. But the fact that our departure numbers are better than our arrival numbers indicates how well our airlines can take a plane that's late and turn it around to get out on time."

The numbers, compiled by the federal Bureau of Transportation Statistics, are a small comfort to airlines and airports where economic miseries that began last summer neared catastrophe after September's terrorist attacks. Both air fares and passenger traffic were off by 12 percent in April over the same month last year. So any good news is welcome.

"I would guess that one of the reasons for the improvement is that the sheer number of flights is down, so handling is going more smoothly," said David Smallen, spokesman for the BTS.

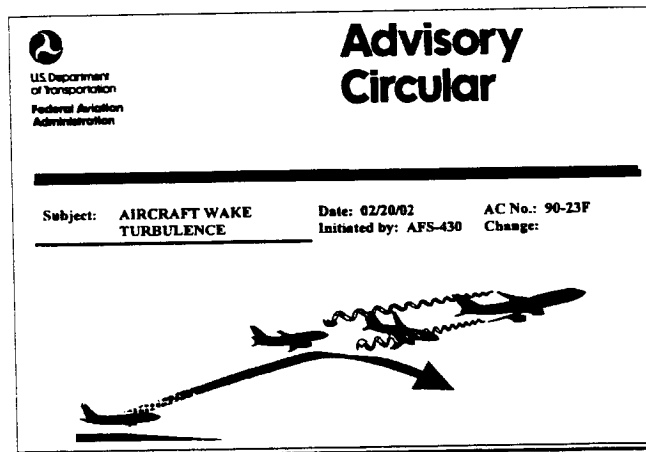
“Between Jan. 1 and April 30, U.S. carriers flew just over 1.7-million flights, down from 2-million for the same four-month period last year. It was the fewest number of flights recorded in the eight-year period dating to 1995.

“But more than 80 percent arrived on time and nearly 85 percent departed on time, the highest in the eight years. Less than 1.3 percent were canceled, the lowest number in the same period.”  
*St. Petersburg Times, June 5, 2002*

These reductions in delays continue the declining trend that started in early 2001, before the events of September 11 (*Hockaday letter to the Corps dated May 30, 2001*), and provide further evidence that a third runway is not needed.

#### **4. New FAA Advisory Circular highlights wind shear and wake problems.**

FAA recently issued FAA Advisory Circular AC 90-23F, titled “Aircraft Wake Turbulence”.



This Advisory Circular describes the potentially severe consequences of wake turbulence, particularly for aircraft landing and taking off, and describes procedures to reduce the risk to aircraft.

“The vortices from large aircraft pose problems to encountering aircraft. For instance, the wake of these aircraft can impose rolling moments exceeding the control authority of the encountering aircraft. Further, turbulence generated within the vortices encountered at close range can damage aircraft components and cause personal injuries. (FAA emphasis) (*Paragraph 3, Page 1, FAA AC 90-23F Aircraft Wake Turbulence*)

“The probability of induced roll increases when the encountering aircraft’s heading is generally aligned or parallel with the flight path of the generating aircraft. Avoid the area below and behind

FAA have now recognized in Advisory Circular AC 90-23F that aircraft wind-shear and/or wake-vortex related operational safety may be compromised by the proposed third runway.

Rising terrain was specifically recognized as one of the factors that will cause “a vortex flow to rise”. A combination of rising vortices and “vortex flow field tilting” caused by wind shear may “damage aircraft components and cause personal injuries”.

In light of the new FAA advisory circular that acknowledges important aircraft safety concerns, it is not in the public interest to issue a permit to fill wetlands before the safety and viability of the proposal have been addressed thoroughly. The Port and FAA have not conducted any studies that specifically address wake turbulence and wind shear in the context of the third runway proposal and the associated walls of heights up to 170 feet.

The Port and FAA did not conduct any adequate safety studies on this topic, and there is no existing runway in the US with walls of this height so close to the runway threshold. The Port only asked its runway design contractor to informally contact bridge design specialists to consider wind effects. FAA only made allusions to the situation at a small airport on the east coast where no accidents had yet been reported. Undocumented informal contacts by the Port and FAA are not an adequate substitute for a scientific study of this potentially significant safety issue.

A full safety assessment is required before any conclusions can be drawn. Aerodynamicists, meteorologists, pilots and other experts must first address this issue. Appropriate aerodynamic modeling and testing, including dynamic computer modeling and flight simulation, must be conducted.

As a result, the reliance on walls as high as 170 feet to support the third runway without thorough analysis of potential aircraft safety problems is not in the public interest because they may compromise aircraft safety.

#### **5. Washington Senate Transportation Committee acts on new regional airport.**

The Washington State Senate Transportation committee conducted a hearing on July 18, 2002, that included the topic of airport siting in Washington.

Testimony was provided by John Sibold, Director, WSDOT Aviation Division; Mary McCumber, Executive Director, Puget Sound Regional Council; and Dr. Stephen L. M. Hockaday, Professor, Cal Poly University. The testimony provided a historical perspective on airport siting in Washington, and identified opportunities for future development of regional airports.

Based on this testimony and committee discussion, an air transportation sub-committee was established to investigate this topic and develop recommendations for future action on regional airport development.

This action by the State offers the opportunity to advance airport system planning in Puget Sound and the whole State.

As a result, any need for a third runway has been eliminated. There is no current need for a third runway due to a drop in air traffic demand; the FAA has identified a no-action alternative that gives large short-term capacity gains at Sea-Tac when necessary; and the State of Washington is now addressing longer-term airport needs. The drop in demand gives the State adequate time to conduct necessary studies and develop appropriate airport development plans.

#### **6. Airlines continue to establish a presence at airports across the region.**

As the region grows, airlines start to examine better ways to serve regional needs. One airline, Helijet International, is providing scheduled service from Boeing Field. Kenmore Airlines is providing scheduled service from Lake Union.

Big Sky Airlines and Olympia Regional Airport are now negotiating the start of scheduled air carrier service between Olympia and Spokane and Portland.

“Olympia may get flights to Spokane.

“Olympia Regional Airport, which has been without regularly scheduled passenger flights since 1993, may land its first air carrier this fall.

“Big Sky Airlines of Billings, Mont., is considering starting three daily flights between Olympia and Spokane as early as October.

“But before it does, Big Sky wants financial commitments from the state government and Olympia's businesses and residents. The Port of Olympia Commission will hold a public meeting Aug. 5 to discuss the proposal.

“Olympia Regional Airport now is used only for private general aviation flights. Empire Airlines of Coeur d'Alene, Idaho, was the last carrier to fly out of the state capital. Empire stopped its Olympia-Spokane service after a year because it couldn't compete with bargain fares offered out of Seattle by Morris Air.

“The Port of Olympia has been wooing Big Sky for more than a year. Big Sky is proposing to operate 19-seat Fairchild Metroliner turboprops between Olympia and Spokane. Service to Portland may follow.

“Seattle-based Alaska Airlines and sister carrier Horizon Air both fly between Seattle and Spokane and Portland.

“The Port of Olympia estimates that residents in the five-county area around the state capital take 1.2 million trips annually by flying out of Seattle or Portland. Business fliers make up 40 percent

of that traffic, 32 percent come from government employees, and leisure travelers make up the rest.

"Port spokeswoman Patti Grant said Big Sky is not looking to presell tickets before it opens the route. But "they are looking for a commitment of some kind," Grant said."  
*(Seattle Times, July 19, 2002)*

The economic factors that once impeded air carrier service at regional airports like Olympia have now been replaced by a series of advantages (smoother security processing, lower security threat, shorter lines, cheaper parking, shorter drive to the airport, etc.)

As a result, air carrier service from regional airports such as Boeing Field and Olympia Regional Airport will increase and reduce demand at Sea-Tac, thereby further reducing any case for a third runway.

### Conclusions

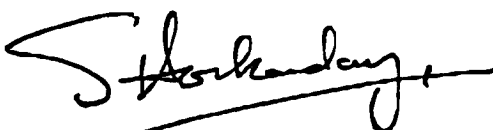
New data continue to show that a third runway at Sea-Tac is not needed, expensive, and would cause significant harm.

- Port of Seattle data show significant drops in air traffic.
- Horizon Airlines continues to reduce aircraft operations.
- Delays at Sea-Tac are reducing.
- New FAA Advisory Circular highlights wind shear and wake safety problems.
- Washington Senate Transportation Committee acts on new regional airport.
- Airlines are continuing to establish a presence across the region.

There is no air traffic need for a third runway. FAA safety concerns impact the usefulness of a third runway. Airlines, airports, and the State of Washington are all pursuing regional solutions that spread air traffic demand over the region and the State and eliminate the need for a third runway.

Filling wetlands and altering watersheds in this environment is counter-productive, especially when there are better and cheaper alternatives that do not cause harm. A third runway is not in the public interest.

Sincerely,



Dr. Stephen Hockaday

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**AR 000062**

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September 4, 2002

U.S. Army Corps of Engineers  
Regulatory Branch  
PO Box 3755, Seattle, WA 98124-3755  
Attn: Colonel Ralph H. Graves, Ms. Muffy Walker, Ms. Gail Terzi

**Re: Port of Seattle, Ref. No. 1996-4-02325: Supplementary comments to Corps of Engineers, concerning new Port of Seattle air traffic data.**

Dear Colonel Graves, Ms. Walker and Ms. Terzi,

This letter provides newly available air traffic data and other information on behalf of the ACC. The data should be considered by the Corps in its public interest evaluation of the third runway at Sea-Tac, and its review of the need for updated NEPA review of the proposal in light of new information concerning the lack of need for and problems with a third runway at Sea-Tac.

The new information is presented below in the following categories:

1. Port of Seattle Data Continue to Show Significant Drops in Air Traffic.
2. FEIS Forecast Is Now Completely Out-of-Date.
3. Airline Financial Problems Continue To Worsen.
4. New Airport Plans Are Advancing.

The data reinforce both the continuing lack of need for and the problems caused by a third runway.

**1. Port of Seattle data continue to show significant drops in air traffic**

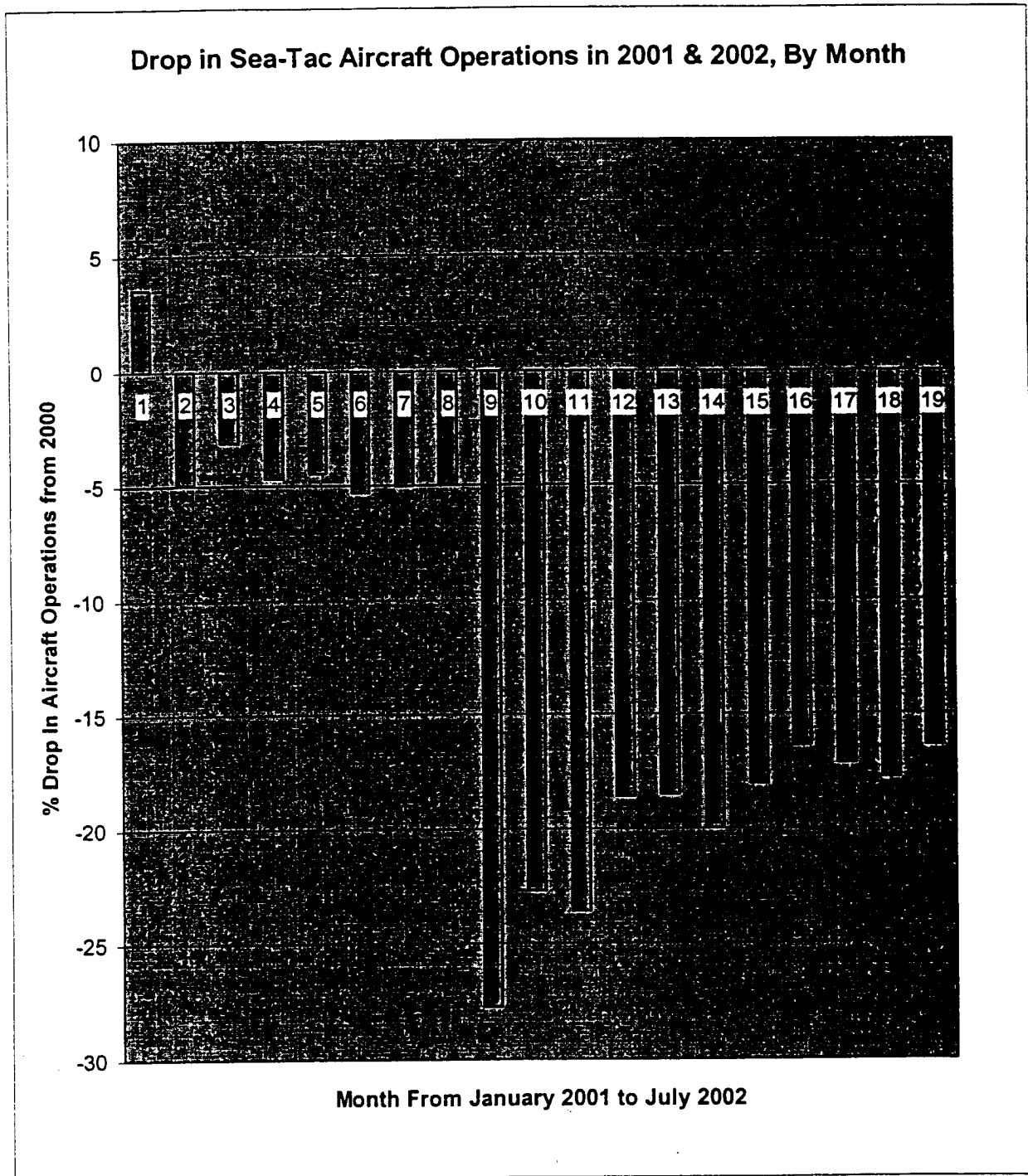
There is no recovery in aircraft operations for July 2002 at Sea-Tac, according to the latest Port data. Aircraft operations and passengers continue to drop significantly in both months.

Aircraft operations were down by 16.4% in July 2002 compared with July of the peak traffic year (2000). There were 6,742 less aircraft operations in July 2002 (34,436) than in July 2000 (41,178).

The percent drop in aircraft operations in each month compared with the same month in the peak year is shown in the following Figure 1. There is an average drop of approximately 17.5% in operations in 2002, compared with the peak year (2000).

**AR 000063**

Figure 1



Similar declines in aircraft operations occurred when measured in terms of flights per day. In July 2002, an average of 1111 flights occurred each day, 16% lower than the 1,328 flights per day that occurred in the same month in the peak traffic year (July 2000).



Passenger demand continued to drop in July. Passengers were down by 5.3% in July 2002 compared with July 2000 (the peak traffic year). There were 155,412 less passengers in July 2002 (2,792,079) than in July 2000 (2,947,491).

The rate of loss of traffic in July accelerated from year-to-year, both for aircraft operations and for passengers:

- The drop in aircraft operations from July 2001 to July 2002 (-12%) was larger than the drop from July 2000 to July 2001 (-5%)
- The drop in passengers from July 2001 to July 2002 (-7%) was larger than the change from July 2000 to July 2001 (2%)

The only increase in July is in the number of passengers carried per aircraft, which has increased considerably between 2000 and 2002. There were 81.1 passengers per aircraft in July 2002, up by 13.3% from the number in July 2000. There were 9.5 more passengers per aircraft in July 2002 (81.1) than in July 2000 (71.6).

The greatest number of flights per day occurred in the peak traffic month of August 2000, when an average of 1,344 flights occurred each day. The July 2002 average of 1,111 flights per day is 17% lower than the 1,344 flights per day that occurred during August 2000.

Port data continue to show that passengers and air traffic remain at low levels that have not been experienced for many years.

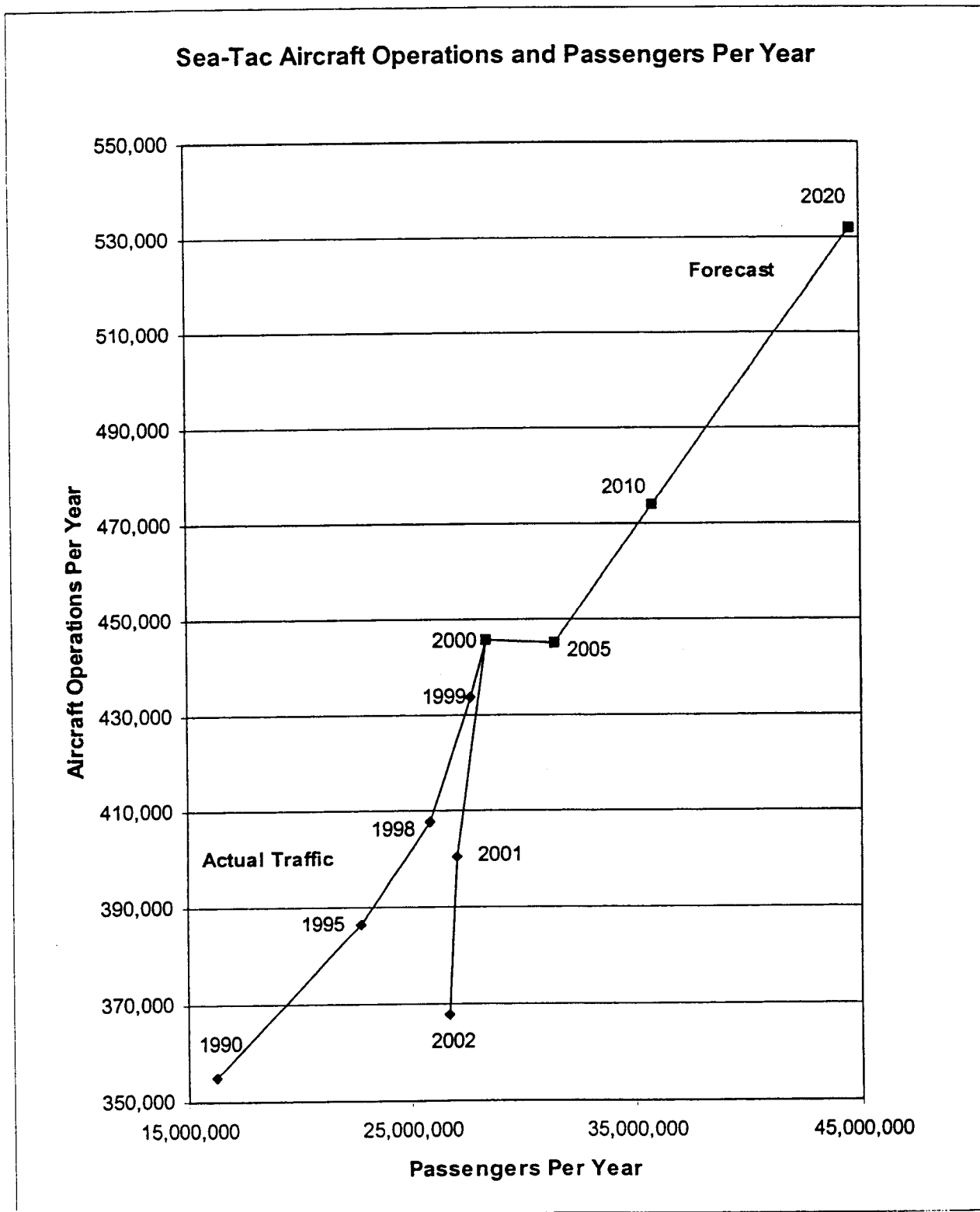
## **2. FEIS Forecast Is Now Completely Out-Of-Date.**

The forecast contained in the FEIS was developed several years ago, and is completely out-of-date, because it does not recognize the sweeping changes that have overcome the aviation industry and the passenger and air traffic activity at Sea-Tac.

The forecast extrapolated from the peak year activity, and does not recognize the significant loss in traffic that has occurred in 2001 and 2002. This problem is shown in Figure 2, which illustrates actual historical traffic and the FEIS forecast.

Figure 2 shows that both passenger and air traffic activity peaked in 2000, and has dropped rapidly since then. It is no longer appropriate to extrapolate from the 2000 peak traffic conditions, given the continuous precipitous drop in traffic for the 19 months since the end of 2000. Traffic levels are now the same as they were 10 years ago in the early 1990s. If the FEIS forecast was adjusted to start from 2002 air traffic levels, traffic would not return to the year 2000 traffic levels until approximately 2015.

Figure 2

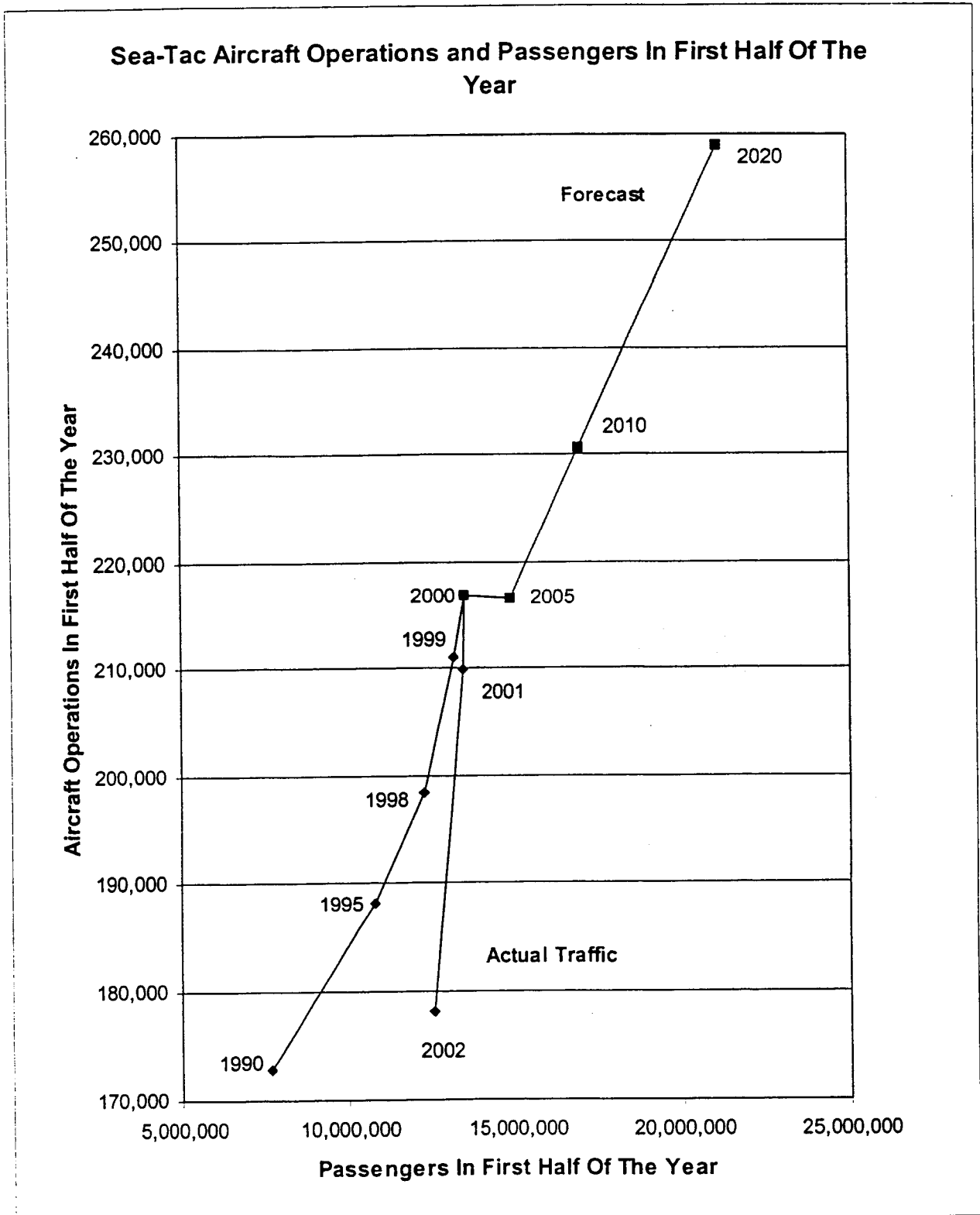


Even adjusting the FEIS forecast to start from 2002 air traffic levels would be an optimistic forecast, given the precarious financial position of the airlines and the continuing economic fragility.

Note that the values for 2002 shown in Figure 2 are extrapolated from the seven months of Port aviation activity data currently available to the whole of 2002. The veracity of this extrapolation is demonstrated in Figure 3, which show the same trends occurring in the first half of each year.

In Figure 3, Port air traffic data for the first half of 2000 through 2002 is displayed directly, without any extrapolation. The same precipitous decline in air traffic activity shown in Figure 2 is repeated in Figure 3.

Figure 3



### **3. Airline Financial Problems Continue To Worsen.**

U.S. News & World Report recently described the situation succinctly:

“If there is a saving grace to owning stock in an airline, it’s that you can have complete faith in its financial results. No one would make up the kind of numbers the big carriers are posting: a collective net loss of some \$12 billion over the past 18 months; revenue down 21 percent from a year ago. Oh yeah, and crushing debt to boot... Last week U.S. Airways filed for bankruptcy protection. Two days later the world’s largest carrier, American Airlines, announced a sweeping reorganization, including 7,000 layoffs and significant schedule reductions. Unhealthy United Airlines is openly discussing the possibility of filing for bankruptcy if it doesn’t get labor concessions. And this might be the beginning. ‘One shoe has fallen,’ says Dan Kasper, an economist at consulting firm LECG. ‘Another one is going to drop’.”  
*(U.S. News & World Report, September 2, 2002.)*

An article in Time Magazine discussed some of the problems faced by the major carriers.

“...So why haven't American, United, US Airways and the three other full-service carriers, which lost \$11 billion last year and stand to lose an additional \$5 billion this year, followed the lead of the profitable discounters by cutting costs and fares? Because that's not the way their business works. They have made, and lost, their money by providing the frequent departures, quick connections, spacious seats and other amenities that have been demanded by business flyers and charging them dearly for that service - more than five times the cost of a discount fare.

“It's no wonder, then, that since 9/11, which accelerated the worst downturn in U.S. aviation history, the major carriers have been whistling in the dark, waiting for their business to return to "normal." But with US Airways' move last week to seek bankruptcy protection, United's warning that it was sliding that way and American's announcement of "fundamental structural changes," the majors as much as admitted that they can't wait any longer for the friendly skies to return. They have to start building a new business model - one focused on both leisure travelers and the growing ranks of business travelers who are mimicking their penny-pinching ways.

“Recent events underscore how much more turbulence lies ahead for the beleaguered carriers as well as the disgruntled traveling public. Fares will drop on some routes and rise on others. More direct flights could open up, even as layovers grow longer at airline hubs. Satellite airports (Baltimore; Long Beach, Calif.) near metropolitan areas could see more traffic while service is reduced to smaller cities like Syracuse, N.Y., and Greensboro, N.C. And forget those promises of more legroom in coach. Those days are over.

“Rather than cause brief setbacks to the airline industry's fortunes, 9/11 and the recession exposed a raft of deeper problems: high fixed costs, a convoluted fare structure, a boom in online bargain hunting by consumers and the growing disaffection of business travelers and their bosses. The full-service airlines' soak-the-rich business model, which has always prized maximizing revenue over operational efficiency, looks all but busted.

“Rebuilding it will be wrenching for an industry that collected a record \$22.7 billion in profits from 1995 to 2000. With the country enjoying an unprecedented economic boom, corporate travel managers were willing to pay the \$2,000 walk-up fares for New York to Dallas or San Francisco to Miami. So it didn't matter how many vacationers were snapping up \$400 deals to fly to Hawaii. From January 1996 to December 2001, business fares rose 75%, according to American Express Corporate Travel.

“But 9/11 and the recession changed everything. At first, it was not so much the fear of a terrorist attack as the worry of being stranded far from home that crimped air travel. Long waits at security checkpoints took their toll. Companies sought alternatives - driving and taking Amtrak; doing business by phone and e-mail or via better-quality and lower-cost videoconferencing technologies - and found they weren't so bad, especially since they helped cut costs. When they did fly, business travelers and their bookers joined leisure travelers in seeking the best deals on the Internet, even if that required planning trips further in advance. And firms learned to rely more on private charters or fractional jet ownership for their top executives, who had been the airlines' most lucrative customers.

“The result: business travelers, who make up just 10% to 15% of all passengers, accounted for only 23% of total airline revenues in 2001, down from 35% in 1999, according to a McKinsey & Co. report. At the same time, total domestic passenger traffic has been falling at an annualized rate of 7%, after growing 4% annually for the previous decade. “Four-figure business fares are like heroin to the airlines. They're addicted to them, but they're bad for their health,” says Richard Aboulafia, an analyst for the Teal Group, an aerospace and defense consulting firm in Fairfax, Va.

“Even when the economy starts to grow again, it's hard to see business-travel revenue returning to its boom-time levels. The economy, after all, is unlikely to be cruising along at the breakneck pace of the '90s. Overall, business travel has fallen more than 20% since 2000, according to the Business Travel Coalition. As many as 80% of road warriors surveyed by the coalition plan to trim air travel even more this year, and nearly three-quarters think some of the cutbacks will be permanent. Phil Condit, CEO of Boeing, has said that at least 10% of the peak business-travel demand could be gone forever. No wonder the S&P Airlines Index is off 37% this year, double the decline in the broader stock market.

“When the Federal Government set up the Air Transportation Stabilization Board (ATSB) last fall to help prop up the ailing airlines with \$10 billion in loan guarantees, many credit-strapped CEOs licked their chops in anticipation of yet another big, fat government handout. But this time, at least so far, Uncle Sam hasn't turned into Uncle Sugar. Trying to impose some much needed discipline on the free-spending flyers, the Stabilization Board has required stringent cost-cutting measures as a condition for its help - and hasn't been shy about turning down such requests, as it did with National and Spirit airlines last week and may soon do with United (though sources tell Time the board has agreed to let United amend its application with more drastic cost-cutting proposals).

“Since Wall Street and private-sector outfits like Texas Pacific Group are willing to step into the breach and provide temporary assistance, many wonder why the government needs to play such a

role at all, especially when pro-subsidy European counterparts are letting their failing carriers fail. "The ATSB is going to do no one any good in postponing the big bang," says Peter Walsh, an aviation expert at Mercer Management Consulting in Dallas. Not only does Washington seem to be in the curious position of picking winners and losers - America West and US Airways, yes; smaller players like National and Spirit, no - but the carriers it decides to support may well gain an artificial competitive advantage against their peers. Says Gordon Bethune, CEO of Continental: "I don't need the government giving United \$2 billion to beat the crap out of me and inflate my wages."

"Keeping dying carriers on life support, critics argue, only deters the industry from undertaking the consolidation it needs to return to health - which oil companies and aircraft manufacturers have already done. Pat Murphy, a former Transportation Department official, asks, "Do we really need six major network airlines?"

"For the moment, that number isn't likely to change. Bad as things are at US Airways, which has the highest costs in the industry (15.2[cents] per seat mile, vs. around 7.5[cents] for Southwest) and has repeatedly failed to expand much beyond the crowded and competitive Eastern Seaboard, it's probably not going under, at least not yet. The airline has reached agreements with some of its workers to save \$550 million this year, and plans to scale back service at less profitable cities, as it did earlier this year in Baltimore. United's challenge may be greater. Many observers believe that its unique, employee-owned corporate structure ensures that labor costs will never go low enough to fix its ailing bottom line..." (*Time Magazine, August 18, 2002*)

#### **4. New Airport Plans Are Advancing.**

Following a Washington State Senate Transportation Committee meeting in July, a legislative airport study is now getting underway to determine the need for and possible siting of a new airport for the Puget Sound region.

The following excerpts from an article by Larry Lange in the Seattle Post Intelligencer describe the progress:

"New idea taxis onto runway: How about another airport?"

Even as Sea-Tac Airport's long-planned third runway remains grounded by controversy, the idea of a whole new airport may soon take flight.

Whether or not (the third runway) is built, we need a second, alternative airport. And we need the process to get there now," said state Sen. Karen Keiser, D-Des Moines, whose district includes Sea-Tac.

As early as next week, a group of state senators will start meeting to examine the issue. A result could be a recommendation for a new airport site, or appointment of an independent body to pick one.

The region last confronted the airport expansion issue in the mid-1990s.

The Puget Sound Regional Council, a planning group, considered three major sites -- at Arlington and Marysville in Snohomish County and in the Lacamas area of Pierce County. But council members abandoned those sites in 1996 in favor of a third Sea-Tac runway.

That decision by the council and the Seattle Port Commission has provoked years of lawsuits and opposition. Some airport neighbors fear noise and environmental degradation from the new runway.

The idea of a legislative airport study came during a Senate Transportation Committee hearing earlier this summer. Chairwoman Mary Margaret Haugen, D-Camano Island, decided to form a subcommittee to take up again the question of a new airport.

Co-chairwoman of the new subcommittee will be Keiser, a known third-runway opponent, and Sen. Margarita Prentice, D-Seattle, who supports the new runway. They said the other members should be named shortly and that meetings should begin after Labor Day.

Prentice said the idea was prompted by questions about the third runway, but the committee will seek objective information from airlines, ports and other experts. Members would need information about air passenger and cargo needs for the next 20 years."

\* \* \*

*(Seattle Post-Intelligencer, August 26, 2002)*

A copy of a presentation by Hockaday to the Washington State Senate Transportation Committee meeting in July is attached to this letter.

### **Conclusions**

New data continue to show that a third runway at Sea-Tac is not needed, expensive, and would cause significant harm.

- Port of Seattle data show significant drops in air traffic.
- FEIS Forecast Is Now Completely Out-Of-Date.
- Airline Financial Problems Continue To Worsen.

There is no air traffic need for a third runway. A rapid decline in air traffic means that the FEIS forecast is now completely out-of-date.



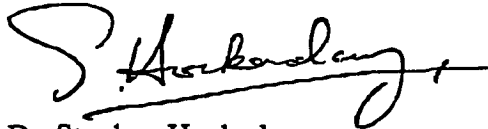
U.S. Army Corps of Engineers

September 4, 2002

Page 11

Filling wetlands and altering watersheds in this environment is counter-productive, especially when there are better and cheaper alternatives that do not cause harm. A third runway is not in the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Hockaday", with a long horizontal flourish extending to the right.

Dr. Stephen Hockaday

AR 000073

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**AR 000074**

**Pacific Aviation Consulting Inc.**  
PO Box 32, Port Hadlock  
Washington 98339-0032

September 15, 2002

U.S. Army Corps of Engineers  
Regulatory Branch  
PO Box 3755, Seattle, WA 98124-3755  
Attn: Colonel Ralph H. Graves, Ms. Muffy Walker, Ms. Gail Terzi

**Re: Port of Seattle, Ref. No. 1996-4-02325: Supplementary comments to Corps of Engineers, concerning new Port of Seattle air traffic data.**

Dear Colonel Graves, Ms. Walker and Ms. Terzi,

This letter provides newly available air traffic data and other information on behalf of the ACC. The data should be considered by the Corps in its public interest evaluation of the third runway at Sea-Tac, and its review of the need for updated NEPA review of the proposal in light of new information concerning the lack of need for and problems with a third runway at Sea-Tac.

The new information is presented below in the following categories:

1. Port of Seattle Data Continue to Show Significant Drops in Air Traffic.
2. Sea-Tac Cargo Traffic Is Also Dropping Significantly.
3. Airline Service Is Starting At Regional Airports.
4. Airline Financial Problems Continue To Worsen.

The data reinforce both the continuing lack of need for and the problems caused by a third runway.

**1. Port of Seattle data continue to show significant drops in air traffic**

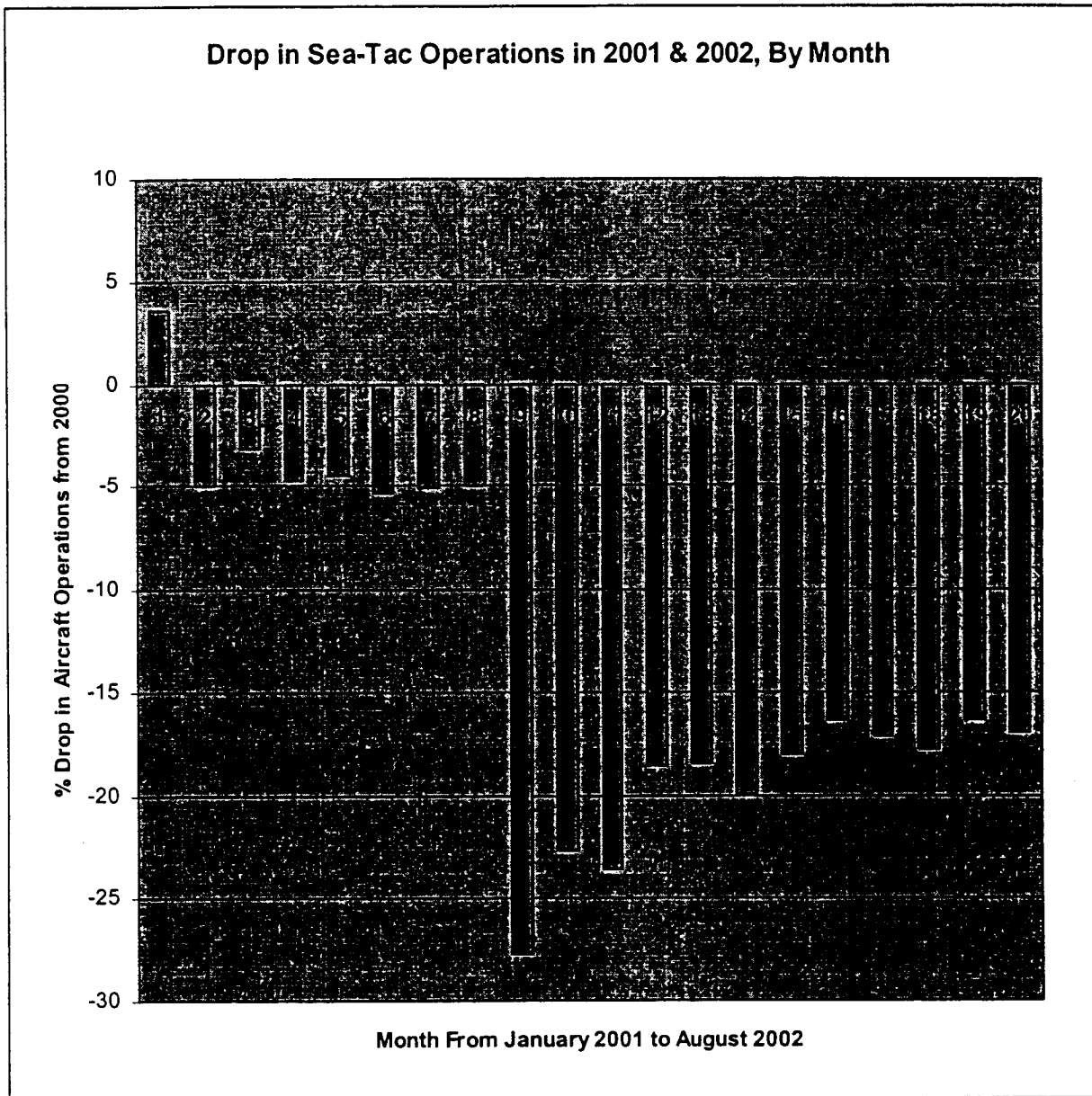
There is no recovery in aircraft operations for August 2002 at Sea-Tac, according to the latest Port data. Aircraft operations and passengers continue to drop significantly in August.

Aircraft operations were down by 16.9% in August 2002 compared with August of the peak traffic year (2000). There were 7,056 less aircraft operations in August 2002 (34,602) than in August 2000 (41,658).

The percent drop in aircraft operations in each month compared with the same month in the peak year is shown in the following Figure 1. There is an average drop of approximately 17.5% in operations in 2002, compared with the peak year (2000).

**AR 000075**

Figure 1



Similar declines in aircraft operations occurred when measured in terms of flights per day. In August 2002, an average of 1116 flights occurred each day, 17% lower than the 1,344 flights per day that occurred in the same month in the peak traffic year (August 2000).

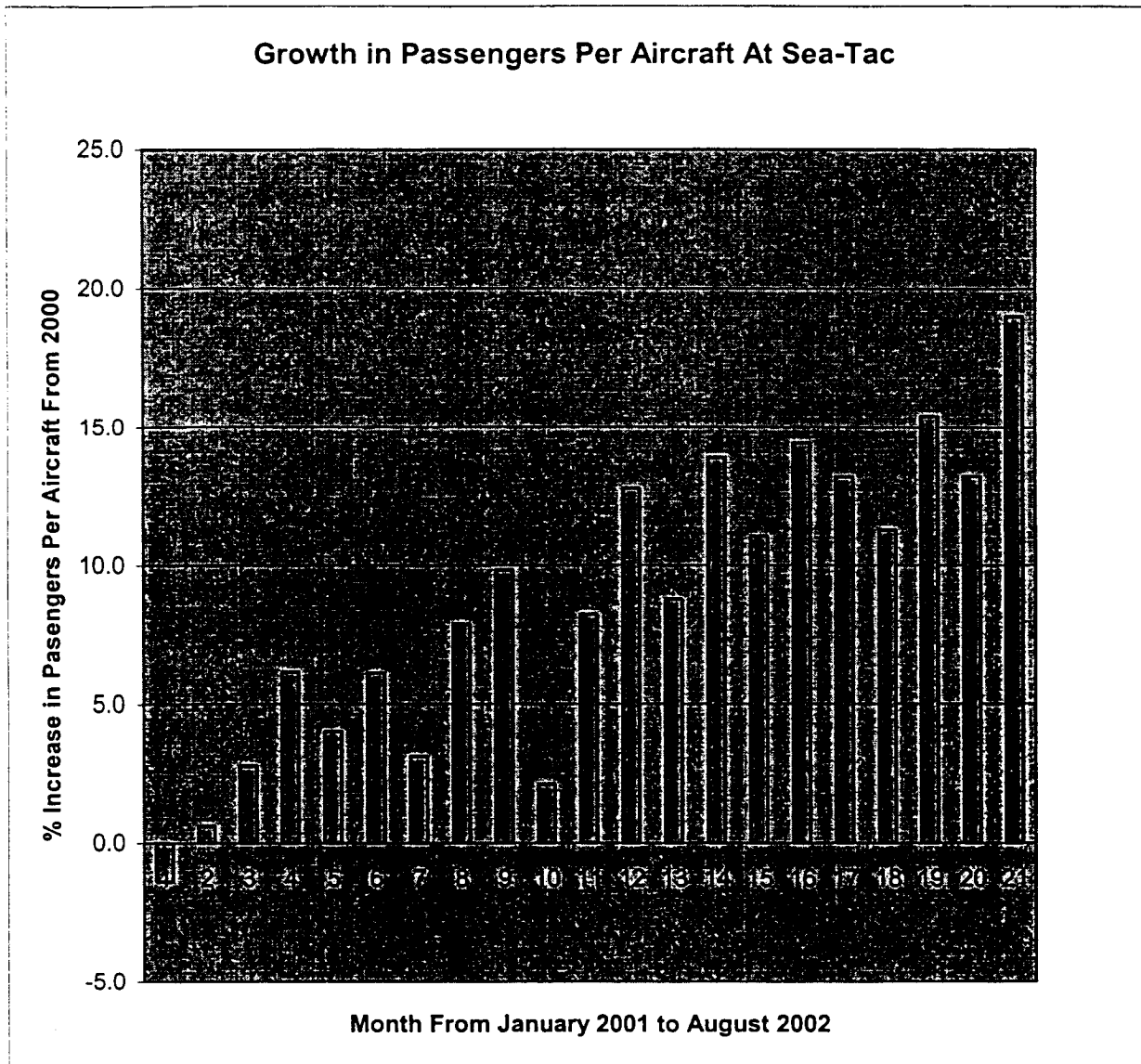
Passenger demand continued to drop in August. Passengers were down by 1.1% in August 2002 compared with August 2000 (the peak traffic year) and down by 6.6% from August 2001. There were 34,082 less passengers in August 2002 (2,958,261) than in August 2000 (2,992,343).

The rate of loss of traffic in August accelerated from year-to-year, both for aircraft operations and for passengers:

- The drop in aircraft operations from August 2001 to August 2002 (-13%) was larger than the drop from August 2000 to August 2001 (-5%)
- The drop in passengers from August 2001 to August 2002 (-5%) was larger than the change from August 2000 to August 2001 (4%)

The only increase in August is in the number of passengers carried per aircraft, which has increased considerably between 2000 and 2002. There were 85.5 passengers per aircraft in August 2002, up by 19.0% from the number in August 2000. There were 13.7 more passengers per aircraft in August 2002 (85.5) than in August 2000 (71.8).

**Figure 2**



The growth in the number of passengers on each aircraft in 2001 and 2002 is shown in Figure 2, and shows that this number has grown consistently over the last two years and that there are now approximately 20% more passengers on each aircraft at Sea-Tac. This 20% growth in passengers per aircraft results in a corresponding drop in the number of aircraft operations.

The greatest number of flights per day occurred in the peak traffic month of August 2000, when an average of 1,344 flights occurred each day. The August 2002 average of 1,111 flights per day is 17% lower than the 1,344 flights per day that occurred during August 2000.

Port data continue to show that passengers and air traffic remain at low levels that have not been experienced for many years.

## **2. Sea-Tac Cargo Traffic Is Also Dropping Significantly.**

As noted in the Puget Sound Business Journal, cargo traffic is also down significantly as a result of economic and security issues:

“Ports, feds try to balance security, efficiency  
Cargo must be rigorously screened, but needs of commerce demand steady movement of goods

“Since Sept. 11, local and federal officials have been trying to accomplish two seemingly contradictory goals at the ports of Seattle and Tacoma:

Move more containerized cargo more rapidly through the Puget Sound's marine and airport terminals, to support the region's sagging economy.

Guarantee that no inbound containers carry any bomb or other terrorist device that might hurt people or destroy property here.

“It's a tall order that's requiring port and federal official to develop new tactics and technologies they hardly imagined a year ago...

“At Seattle-Tacoma International Airport the work is more incremental. Officials there have for years been working to improve security for passengers. Now they're expanding their efforts to also prevent airplanes being used to import terrorism, in the form of bombs or any other weapon.

"The key issue for us is how do you bring real security into the movement of cargo without severely compromising efficiency," said Tim Farrell, deputy executive director for the Port of Tacoma. "If efficiency gets compromised, you've done the terrorists' job for them."

“Airlines lose cargo business

“Decreased passenger traffic since Sept. 11 has decimated airlines, causing about \$15 billion in losses. Less well-known is that air and ocean cargo volumes also have sagged, wounding the already weak ocean cargo business, as well as further damaging air carriers.

Passenger airlines have historically depended on cargo to make money from the paper-thin margins generated by carrying passengers. Now, with cargo volumes down 10 percent to 15 percent from prior to Sept. 11, they're fighting to keep their cargo holds full, and the prices they can charge are suffering.

"Right now they're cutting each others' throats for market share," said John Faulkner, business development manager for Sea-Tac. "That's dangerous. If you look at the last 10 years, the airlines would never have made money without cargo revenues."

“In this environment the security task is enormous, requiring rethinking about virtually every step of the import route from, for instance, a loading dock in Thailand to a warehouse in Kent. The

officials must prevent terrorist weapons from arriving by ship or aircraft, but they can't strangle commerce in the process...

"We want to determine and find and stop weapons of mass destruction before they arrive on our shores," said Mike Milne, public affairs officer and former enforcement coordinator for the Northwest Great Plains Customs Management Center in Seattle.

"Variety of strategies..."

"That is much the same tactic being used at Sea-Tac, where the focus is on tightening screen of cargo before it ever reaches an aircraft.

Under new rules no U.S. mail larger than a letter is allowed on a passenger aircraft, nor is any package from anyone other than a "known shipper." The latter is a technical term that refers to a company or exporter that has been thoroughly inspected by U.S. authorities, and that has agreed to maintain specific security standards to prevent dangerous materials from being slipped into their containers.

Anything not from a known shipper isn't allowed on passenger aircraft at all, and it must be unpacked and individually inspected before it's allowed on a cargo flight, Faulkner said.

A down side of the new system is that smaller companies are finding it difficult to get their products on aircraft. These companies are too small to rated as "known shippers," but don't have enough volume to launch the certification process, Faulkner said.

"A lot of these little companies, mom and pop shops that had become international companies are a result of e-commerce, are having a hard time getting good lift," he said.  
*(Puget Sound Business Journal September 6, 2002)*

For example, Port data show that 32,107 metric tons of cargo were shipped in August 2002, 19% less than the 39,459 metric tons shipped in August 2000.

## **2. Airline Service Is Starting at Regional Airports.**

Significant new service is being introduced at Olympia Regional Airport, according to the Puget Sound Business Journal:

"Big Sky Airlines will begin daily round-trip service Nov. 13 between the Olympia Regional Airport in the state capital and Spokane - if the company gets advance purchase of bulk tickets, a travel contract with the state of Washington and improvements to the airport.

"The Port of Olympia said it is promoting the sale of advance tickets and facilitating negotiations between the state and the Montana-based airline to secure a contract for state employee travel between Olympia and Spokane. The port said it already has budgeted for "minor improvements" needed at the airport.



“If all conditions are met, Big Sky said, it will operate three daily round-trip flights Monday through Friday, and one round-trip daily on Saturday and Sunday. The flight takes just over an hour...

“The Port of Olympia said it will spend about \$97,000 this year on airport improvements and promotion of the commercial air service. Big Sky's pending lease of port facilities, and a "facility fee" added to the cost of each ticket, is expected to generate \$29,000 in port revenues the first year and about \$58,000 in following years.

“The Economic Development Council of Thurston County is assisting with local marketing of advance bulk ticket purchases by business and other travelers, the port said. Business travel accounts for about 40 percent of air travel to Spokane from Thurston, Mason and parts of Lewis, Grays Harbor and Pacific counties, according to a recent study by the port. Big Sky plans to offer significant price and other incentives to bulk ticket purchasers, the port said.

“Negotiations between the state and the regional airline should result in a contract later this month for travel between Spokane and Olympia for state employees to use the service, the port said.”  
*(Puget Sound Business Journal, September 13, 2002)*

When added to the current scheduled service at some regional airports, and added to the State of Washington's new planning effort to develop a new regional airport; this new airline service at Olympia demonstrates that the Puget Sound region's aviation needs will be met by a distributed regional system of airports.

### **3. Airline Financial Problems Continue To Worsen.**

An authoritative article from Forbes outlines the serious problems plaguing all of the major air carriers and explaining why there will be no recovery in the airline industry in the foreseeable future.

“One Year Later -No End To The Turbulence For Airlines

“Six months after we last explored the overall state of the airline industry, things have only gone from bad to worse. Most carriers are holding junk credit ratings, one has filed for bankruptcy protection and another may be unable to avoid it. The losses are getting narrower, but they're still there. Analysts expect most carriers to report a loss for fiscal-year 2002 and 2003.

“Was Warren Buffett right when he said that investors would have been better off if the Wright Brothers had crashed at Kitty Hawk? Maybe. But if there is any good that has come from the industry carnage of the past two years, it is that executives finally acknowledge that theirs is a fundamentally flawed business model and that they cannot continue as is. Judging from some of the steps being taken now, they won't continue as is for much longer.”  
*(Forbes Magazine, September 11, 2002)*

With airline financial and operational problems continuing to worsen, there is no recovery in air traffic in sight for Sea-Tac

### Conclusions

New data continue to show that a third runway at Sea-Tac is not needed, expensive, and would cause significant harm.

- Port of Seattle Data Continue to Show Significant Drops in Air Traffic.
- Sea-Tac Cargo Traffic Is Also Dropping Significantly.
- Airline Service Is Starting At Regional Airports.
- Airline Financial Problems Continue To Worsen.

Constructing a third runway at Sea-Tac which requires filling of wetlands and altering watersheds in the current aviation and business environment is not in the public interest, especially when there are better and cheaper alternatives - such as the regional solutions now being implemented that are now being implemented - that do not cause harm.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Hockaday", with a horizontal line drawn through the middle of the signature.

Dr. Stephen Hockaday

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**AR 000083**



1           3.     For four years, I worked for the airspace and navigation division of Eurocontrol,  
2 an international organisation with 28 member countries that assists in the development and  
3 harmonisation of the airport and airspace infrastructure in Europe. I was Head of Eurocontrol's  
4 airspace and airport modelling service, with responsibility for development and application of  
5 innovative real-time and fast-time simulation models in support of European airport and airspace  
6 system development.

7           4.     I was project manager for a five year FAA airport improvement program which  
8 examined and recommended major development programs to improve the efficiency of  
9 operations at the nation's ten busiest airports, including revisions to air traffic control procedures.  
10 In another major project for the Federal Aviation Administration, I was technical manager for the  
11 development of procedures to determine airport capacity and delay. This project resulted in an  
12 airfield capacity handbook and mathematical models of airfield operations. The handbook and  
13 models were published by the FAA as an Advisory Circular which contains FAA approved  
14 airfield analysis techniques.  
15

16           5.     Details of my qualifications and experience are contained in my C.V., which is  
17 attached to this declaration as Exhibit A.  
18

19           6.     I am familiar with the proposed third runway for Seattle-Tacoma International  
20 Airport (Sea-Tac), and I have reviewed over the years the documents prepared by the FAA and  
21 the Port concerning the proposal, including the Master Plan Update, the Environmental Impact  
22 Statement and the associated technical documents.  
23

24  
25 **DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY**

**HELSELL FETTERMAN LLP**  
1500 Puget Sound Plaza  
1325 Fourth Avenue

**Rachael Paschal Osborn**  
Attorney at Law  
2421 West Mission Avenue

- 2

Seattle, WA 98101-2509

Spokane, WA 99201

**AR 000085**

1           7.       There is no overriding public interest to be served by allowing the Port to  
2 commence construction of a third runway prior to resolution by the PCHB of the pending 401  
3 appeal. In my opinion, the over-riding public interest is that the Port should not construct the  
4 third runway.

5           8.       The events of September 11 have had a significant negative effect on the whole  
6 aviation industry, including Sea-Tac and the airlines that serve it. These new impacts have  
7 changed the aviation industry fundamentally, have completely out-dated and invalidated old  
8 assumptions and strategies, and require that any previously planned investments be critically re-  
9 examined to determine their suitability in the new situation. No construction of infrastructure for  
10 airport expansion should proceed until its financial and other adverse consequences have been re-  
11 assessed.

12           9.       Any delay in construction of the third runway while the PCHB renders a decision  
13 is in the public interest and will allow the necessary time to reassess the proposal from demand,  
14 security, and financial perspectives.

15           10.      The adverse impacts of the events of September 11 include:

- 16                   • the reduction in the financial health of the region and the nation,
- 17                   • a decline in passenger demand and aircraft operations,
- 18                   • the rapid deterioration in the financial condition of airlines, and
- 19                   • the increased costs and reduced revenues of airport operators.

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DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 3

HELSELL FETTERMAN LLP  
1500 Puget Sound Plaza  
1325 Fourth Avenue  
Seattle, WA 98101-2509

Rachael Paschal Osborn  
Attorney at Law  
2421 West Mission Avenue  
Spokane, WA 99201

1           11.    **The reduction in the financial health of the region and the nation impacts**  
2 both the amount of air travel and the ability of communities to support expensive infrastructure  
3 programs.

4           12.    The Business Travel Coalition, an advocacy group for business travelers,  
5 conducted a survey of 137 corporations and found that through the end of the year, 81 percent  
6 plan to travel much less than they did before the attacks. The survey found that business air travel  
7 is on track to be 50 percent less in January 2002 than in January 2001.

8  
9           *“Radnor, PA – September 24, 2001 - The Business Travel Coalition (BTC) today released its*  
10 *second survey of corporate travel and purchasing managers in the aftermath of the 9/11/01*  
11 *national tragedy. The survey of 137 corporations was designed to understand decisions*  
12 *corporations are taking regarding travel policy, and operations--especially during emergencies.*  
13 *A key objective of the survey was determining when business travel levels might begin to*  
14 *rebound.*

15           *“According to BTC, because of the precipitous drop in business travel already underway*  
16 *through September of this year, business travel levels for January 2002 are on track to be 50%*  
17 *less than January 2001. In an industry where a one-cent increase in fuel costs can mean some*  
18 *\$800M for the industry, this fall off in premium traffic is staggering. Recently announced*  
19 *capacity cuts will only be somewhat ameliorating in impact. The Air Transport Association*  
20 *reported last week that business travel from January through July 2001 was down 41% when*  
21 *compared with the same period in 2000. A major BTC study released in June 2001 indicated*  
22 *that on average major corporations had as a goal to cut travel and entertainment expenses by*  
23 *28% in 2001.”*

24           13.    Communities in the vicinity of airports are suffering from drops in commercial  
25 activity and airport-based revenues. Exhibit B illustrates the problems faced by the city of  
26 SeaTac and other communities near airports. About 40% of SeaTac's property taxes, or \$3  
27 million a year, are paid by airlines, which are assessed, in part, according to the number of people  
28 the airlines fly into the airport. The city also collects \$1 dollar for every car that parks in airport

29           DECLARATION OF  
30           STEPHEN L. M. HOCKADAY  
31           IN SUPPORT OF ACC'S MOTION FOR STAY

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37           Attorney at Law  
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1 or satellite lots, generating nearly \$5 million a year, about 20% of total tax collections. Hotel-  
2 and motel-room taxes -- SeaTac has 6,300 rooms -- generate nearly \$1 million more. Elizabeth  
3 Spencer, finance director for the city of SeaTac, is estimating tax revenues could fall \$3.3  
4 million, or 15%, next year.

5 14. A significant decline in passenger demand and aircraft operations has  
6 occurred at Sea-Tac since September 11. Alaska Airlines (with its partner Horizon Airlines) is  
7 the largest airline at Sea-Tac, operating nearly half of all Sea-Tac aircraft operations in 2000.  
8 Since September 11, Alaska/Horizon has cancelled approximately 20% of its flights, as shown in  
9 Exhibit C and Exhibit D. Other airlines have made similar cuts in aircraft operations. For  
10 example, United Airlines (the second largest airline at Sea-Tac) has reduced its operations by  
11 approximately 20% and has also announced that it will cease all operations of Shuttle by United  
12 at the end of October (See Exhibit E).  
13

14 15. Prior to September 11, air traffic at Sea-Tac was already dropping; with  
15 approximately 5% less aircraft operations in the summer of 2001 than in the summer of 2000.  
16 The events of September 11 caused an even larger loss, and resulted in an additional 20% drop in  
17 traffic. Adding these losses together results in a net loss of approximately 25% of aircraft  
18 operations demand in 2001 compared with 2000. (Announcements by United and other airlines  
19 suggest that net air traffic losses will exceed this 25% before the end of the year.)  
20

21 16. FAA benchmark data show that Sea-Tac was operating efficiently in 2000. This  
22 efficiency resulted from the excess of runway capacity that is available for most of the year. This  
23

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1 excess capacity occurs all of the time when the weather is good and most of the time when the  
2 weather is poor. For example, during summer peak arrival periods, there was excess capacity  
3 97% of the time (with poor weather responsible for excess demand 3% of the time).

4 17. With the current lower traffic levels, Sea-Tac now has significant additional  
5 excess capacity; and any suggestion that a third runway is needed is clearly misplaced. (For  
6 example, during summer peak arrival periods, there is now excess capacity more than 99% of the  
7 time (with poor weather responsible for excess demand for less than 1% of the time).  
8

9 18. In this environment, a stay of construction for 6 to 12 months will do no harm,  
10 and will likely allow the Port and the region to reassess the proposed third runway and potentially  
11 save in excess of \$500 million in unnecessary construction costs.

12 19. The passenger and aircraft operations forecasts that were contained in the EIS and  
13 used to justify a third runway are now completely wrong and out of date. A new forecast and  
14 analysis is required before a third can runway can be considered in the new environment.  
15

16 20. The rapid deterioration in the financial condition of airlines is causing bankruptcy  
17 for some airlines and significant cutbacks for others. Exhibit F illustrates these problems:

18 *"The losses we face are truly staggering," said Donald J. Carty, chairman of American Airlines,*  
19 *in a letter to employees. "They exceed anything we ever imagined at American. Right now it is*  
20 *survival, not profitability, that is our core challenge."*

21 *"Almost everyone is predicting that a number of airlines will fail, and that the surviving airlines*  
22 *will be smaller a year from now.*

23 *"In 18 years at the helm of American, Robert L. Crandall coped with deregulation, soaring jet-*  
24 *fuel prices during the Persian Gulf War, several recessions and terrorist scares that cut into*  
25 *traffic. None of that, Crandall said, compares with the current situation.*

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1 *"This is clearly the worst single event of our lifetime, probably the worst single event of this*  
2 *century. It's changed public perceptions about air travel and the general feeling of safety in the*  
3 *United States overall. This is substantially worse than all those problems," said Crandall, who*  
4 *retired in 1998 as chairman and chief executive."*

4 21. As a result, airlines are no longer able to support the infrastructure development  
5 they had planned before September 11, as illustrated in Exhibit G:

6 *"Alaska Airlines said yesterday that it is postponing adding a three-story wing to its Sea-Tac*  
7 *Airport maintenance hangar until airlines recover from the sudden drop in traffic and revenue.*

8 *"The decision, which also postpones a related project to remodel 70,000 square feet of shops*  
9 *and other areas, will save the Seattle-based carrier roughly \$20 million, according to a*  
10 *statement posted on one of the company's Web sites yesterday."*

11 22. **The increased costs and reduced revenues of airport operators** has caused a  
12 number of airport expansion plans to be shelved around the country, as shown in Exhibit H:

13 *"In the weeks since the attack, officials in at least 14 cities--including Atlanta; Boston; Dallas;*  
14 *Detroit; Fort Lauderdale; Manchester, N.H.; Miami; Orlando; Raleigh, N.C.; Salt Lake City;*  
15 *San Francisco; and Tampa--have said that runway, terminal, and parking-deck expansions*  
16 *would be halted or placed under review."*

16 Chicago O'Hare's expansion plans have also been put on hold.

17 *"October 1, 2001 — Governor George Ryan says today that plans to build a third airport or*  
18 *expand O'Hare International Airport are on the back burner.*

19 *"The governor said those plans have come to a standstill because his priority now is to make*  
20 *sure the state's major airports are secure and safe. Ryan supports building a third airport in*  
21 *Peotone to ease overcrowding at O'Hare. But Chicago Mayor Richard Daley wants to expand*  
22 *O'Hare instead.*

22 *"Ryan says the mayor's plan calls for airlines to pay for some improvements to O'Hare. But the*  
23 *governor says airlines might revisit that plan because they may have a hard time paying for*  
24 *improvements while they are suffering financially. (Copyright 2001 by The Associated Press. All*  
25 *Rights Reserved.)*

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1 *"This decline in passengers and revenues has further created instability in the airport bond*  
2 *market as noted in Standard and Poor's announcement last week that all of its North American*  
3 *airports are on "credit watch." [September 25, 2001, Airports Council International]*

4 26. The Port of Seattle's bond ratings are also affected, (See Exhibit J). Moodys has  
5 put the Port's Passenger Facility Charge Revenue Bonds, Series 1998 A & B on the watchlist for  
6 a possible downgrade.

7 27. The airport industry is so concerned about airport financial conditions that  
8 industry groups AAAE and ACI are now lobbying for federal assistance, as shown in Exhibit K:

9 *"Airport Group Presses Congress For Financial Relief For Nation's Airports. U.S. airports*  
10 *need immediate federal assistance to help counter an "impending crisis" as a result of recent*  
11 *hijacking events, the American Association of Airport Executives (AAAE) and Airports Council*  
12 *International (ACI) wrote members of Congress last week.*

13 *"Without immediate attention to address financial and insurance-related issues, many airports*  
14 *will soon be forced to significantly alter or cut operations, a result that will have far-reaching*  
15 *negative implications for the travelling public, the communities airports serve, and the national*  
16 *economy," the Sept. 26 letter stated."*

17 28. These airport finance problems mean that no community should blindly continue  
18 to construct expensive expansion schemes without a thorough review of the need for the  
19 expansion; given the drop in demand and the reduced ability of the airport and its customers (the  
20 airlines and the traveling public) to pay for the schemes.

21 29. **In summary, even before September 11, aircraft operations were dropping**  
22 **significantly at Sea-Tac, contrary to Port forecasts. The events of September 11 have reshaped**  
23 **and weakened the aviation industry in ways that were not conceivable before September 11. The**  
24 **nation's businesses, passengers, airlines, airports, and the communities around airports are each**  
25 **significantly weaker financially than they were previously. In this environment, prudent airports**

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1 are postponing or canceling expansion plans, until the need and ability to pay are more certain.

2 There is, therefore, no over-riding public interest that the Port of Seattle should proceed  
3 precipitously with its plans for a third runway.

4 30. Even before September 11, it was clear that a third runway is not in the  
5 public interest, for the following reasons:

- 6 a. A Third Runway is Not Needed
- 7 b. Better Alternatives Are Available
- 8 c. A Third Runway is Inefficient
- 9 d. Significant Safety Problems Exist
- 10 e. Regional Impacts of a Third Runway are Severe
- 11 f. There are Major Environmental Problems

12  
13 31. Exhibit L to this declaration provides detailed information on these six topics and  
14 confirms that a third runway at Sea-Tac is not in the public interest. A brief overview of these  
15 six topics is provided below.

16 32. A third runway is not needed because FAA and Port data show that the existing  
17 runways can accommodate the growth in air traffic forecast by the Port without increasing delays  
18 to aircraft at Sea-Tac above the very low levels reported by FAA for Sea-Tac in the year 2000.  
19 (FAA reported that 99% of aircraft using Sea-Tac in 2000 had no significant delay; and airline  
20 data showed that essentially all arrival lateness was due to late departure from the upstream  
21 origin airport and not due to any restrictions at Sea-Tac.)  
22  
23

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1           33.     In addition (before the events of September 11), aircraft operational demand at  
2 Sea-Tac was already dropping significantly in 2001. In August 2001, demand dropped by  
3 approximately 5% when compared with August 2000. This drop is due to airline operational  
4 decisions to increase the size of aircraft operating at Sea-Tac and to increase the load factor  
5 (proportion of occupied seats on aircraft). Exhibit M provides these data. In August, these  
6 strategies resulted in 10% less aircraft operations than would have occurred without larger  
7 aircraft and higher load factors.

8  
9           34.     There are many alternative means for accommodating aviation demand that do not  
10 require the Port's proposed third runway, as discussed in the following paragraph.

11           35.     **Better alternatives are available** A variety of better alternatives are available in  
12 lieu of the proposed third runway. These alternatives include use of larger aircraft, use of other  
13 regional airports, and technology-based capacity increases.

14  
15           36.     Use of larger aircraft and higher load factors are naturally occurring phenomena  
16 already under way at Sea-Tac. Airlines and other aircraft operators have made sound business  
17 decisions to use larger aircraft and thereby reduce the number of aircraft operations.

18           37.     Use of other regional airports (including existing facilities such as Boeing Field,  
19 Paine Field, and McChord AFB) is a feasible option that is available in the event that additional  
20 regional runway capacity is needed.

21  
22           38.     Technology-based capacity increases are also available to increase Sea-Tac  
23 capacity. The use of Localizer Directional Aid (LDA) Simultaneous Offset Instrument

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1 Approaches (SOIA) approaches allows an additional arrival stream in weather minimums lower  
2 than those required for visual approaches. These procedures have been used for many years at St.  
3 Louis Lambert Field and resulted in a capacity gain of about 18 arrivals per hour.  
4 Implementation of these approaches would allow Sea-Tac to operate successfully with low  
5 delays over a wide range of weather conditions.

6 39. Additional new technologies offer additional runway capacity benefits; including  
7 the use of Global Positioning System (GPS), Precision Radar Monitoring (PRM), Traffic Alert  
8 and Collision Avoidance System (TCAS) and Flight Management System (FMS) equipment and  
9 procedures to facilitate multiple approaches in poor weather conditions. An FAA benchmark  
10 report noted that immediately available technologies would increase Sea-Tac capacity by 5%,  
11 and that additional capacity gains may be available in the future as the technologies mature.

12 40. **A third runway is inefficient.** Additional taxi distance and runway crossings  
13 cause a third runway to be inefficient. Each aircraft using a third runway would have to taxi an  
14 additional 2,500 feet and cross the two existing active runways when taxiing to or from the  
15 passenger terminal building. This can be expected to add 5 or more minutes of delay to each  
16 aircraft using a third runway, offsetting any reduction in runway delay that may occur.

17 41. Significant airspace interactions with Boeing Field will adversely impact the  
18 efficiency of a third runway and cause equivalent losses of capacity at Boeing Field. Adding an  
19 additional runway at Sea-Tac, pointed directly at Boeing Field only 4 miles away, is bound to  
20 exacerbate this interaction. The airspace interactions between Boeing Field and Sea-Tac mean  
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1 that any gains in capacity at Sea-Tac are obtained at the cost of a similar reduction in capacity at  
2 Boeing Field.

3 42. Insufficient spacing of a third runway from the existing runways 16L-34R and  
4 16R-34L would also compromise the operating efficiency of both existing runways. Aircraft  
5 instrument operations on a third runway would be dependent on all operations on Runway 16R-  
6 34L. In addition, all instrument operations on Runway 16R-34L would be dependent on  
7 operations on both of the other two runways (a third runway and Runway 16L-34R). As a result,  
8 operation of a third runway disrupts the usefulness of the existing runway 16R-34L in such a way  
9 that much of any runway capacity gain with a third runway is offset by a corresponding loss in  
10 capacity of the existing runways.  
11

12 43. **Significant safety problems exist.** Aircraft taxiing safety will be compromised  
13 with a third runway. Aircraft crossing active runways without permission or as a result of a  
14 controller error are referred to as runway incursions, and these incursions are a serious safety  
15 hazard that is being addressed as an urgent matter by FAA. A third runway would increase the  
16 risk of runway incursions for aircraft using Sea-Tac, as any aircraft taxiing to and from the new  
17 runway would have to cross the two existing active runways, thereby increasing the risk of  
18 runway incursions and aircraft collisions by a factor of up to two times existing rates.  
19

20 44. Aircraft airspace operational safety will be compromised due to multiple airspace  
21 interactions with Boeing Field, which is only some four miles from Sea-Tac. The addition of one  
22 more arrival or departure stream into the airspace increases the complexity of the airspace and  
23

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1 increases the number of potential conflicts with Boeing Field traffic significantly. These  
2 additional conflicts directly result in increases in controller workload, and can contribute to  
3 safety problems and potential controller operational errors.

4 45. Aircraft safety may be compromised by the proposed third runway, due to the high  
5 walls and embankment that would surround the new runway. There would be a near vertical  
6 drop of approximately 170 feet on the west side of the proposed new runway that would start less  
7 than 100 feet from the edge of the Runway Safety Area (RSA). Accident site distribution data  
8 collected by ALPA (Airport Engineering, Ashford N. 1992, Figure 9.1) show that aircraft  
9 accident sites are often outside the boundary of the RSA. Accident sites such as those identified  
10 by ALPA, if they occurred on a third runway, could cause aircraft to hit the vertical walls and/or  
11 drop 170 feet into Miller Creek.  
12

13 46. Wind shear hazard potential remains unexamined. According to the Port, no FAA  
14 wind shear criteria are available for the retaining walls, their geometry and their proximity to the  
15 proposed third runway. Building near-vertical walls, with drops of 60' to 170', off the end and  
16 sides of a runway raises wind shear safety concerns that must be fully addressed before  
17 concluding that there is no safety problem. Reliance on walls as high as 170 feet to support the  
18 third runway without thorough analysis of potential aircraft safety problems is not in the public  
19 interest because they may compromise aircraft safety.  
20

21 47. **Regional impacts of a third runway are severe.** A third runway at Sea-Tac has  
22 severe regional impacts, including the use of scarce regional resources, maintenance of high  
23

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1 airport ground access costs, high air ticket prices, and failure to provide a long-term regional  
2 solution.

3 48. Use of scarce regional resources may foreclose multiple commercial airport  
4 solutions that are in the public interest. The financing that would be committed to the third  
5 runway and other Sea-Tac improvements is likely to foreclose public tolerance and ability to pay  
6 for the expenditures needed to develop a truly regional airport system.

7 49. High airport ground access trip costs to Sea-Tac will be maintained as the trips  
8 originate across the region and must traverse the congested freeway system adjacent to Sea-Tac  
9 to get to the airport. A multiple airport system would reduce overall airport ground access travel  
10 , and thereby save passenger time, highway congestion, and regional air pollution.

11 50. High air ticket prices will be reinforced by the additional costs airlines must bear  
12 to pay for a third runway and other improvements at Sea-Tac.. The public is best served by the  
13 availability of alternatives and competition for services.

14 51. Failure to provide a long-term regional solution is a major flaw of a third runway.  
15 Both PSRC and the Port recognize the need for a second regional commercial service airport  
16 over the longer term. With a second airport in place, there would be no conceivable justification  
17 for a third runway at Sea-Tac.

18 52. Recent FAA and Port data reconfirm that, not only is a third air carrier runway at  
19 Sea-Tac not the best solution to the Puget Sound region's airport capacity needs, it is in fact  
20 harmful to the development of a good long-term regional solution. . The existing Sea-Tac  
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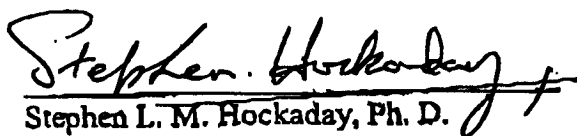
1 airport can continue to accommodate regional demand while the best long-term alternatives are  
 2 being identified. There is now an opportunity to revisit regional planning studies and develop of  
 3 a good aviation system to serve the longer-term interests of the Puget Sound region.

4 53. There are major environmental problems which have been documented  
 5 thoroughly elsewhere and are not repeated here. The problems include wetland fill and  
 6 disruption, aircraft noise, stormwater and groundwater management problems, air and water  
 7 pollution, harm to endangered species, and construction disruption.

8 54. Even before September 11, it was apparent that a third runway is not in the public  
 9 interest. After the events of September 11, the lack of an over-riding public interest for the Port  
 10 to proceed with a third runway is even more clear.

11 I declare under penalty of perjury under the laws of the State of Washington that the  
 12 foregoing is true and correct.

13 DATED this 7<sup>th</sup> day of October, 2001, at Port Hadlock, Washington.

14  
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 17 Stephen L. M. Hockaday, Ph. D.

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**List of Exhibits**

- 1
- 2 **EXHIBIT A C.V. for Dr. Stephen Hockaday**
- 3
- 4 **EXHIBIT B Airport Town Fears What May Happen If Air Travelers Continue**
- 5 **to Stay Home**
- 6 **EXHIBIT C Horizon Air and Alaska Air Seattle Flight Cancellations**
- 7
- 8 **EXHIBIT D Alaska Airlines Traffic Is Down**
- 9
- 10 **EXHIBIT E United Airlines Eliminates Shuttle**
- 11 **EXHIBIT F Airlines Scrambling to Survive**
- 12 **EXHIBIT G Alaska Airlines puts off Sea-Tac Hangar Project**
- 13
- 14 **EXHIBIT H Plane Talk - Airports Are in a Holding Pattern**
- 15 **EXHIBIT I Port budget to get \$20 million trim**
- 16 **EXHIBIT J Moodys Puts Port of Seattle Bonds on Watch List**
- 17 **for Downgrade**
- 18 **EXHIBIT K Airport Group Presses Congress For Financial Relief For**
- 19 **Nation's Airports**
- 20 **EXHIBIT L A Third Runway at Sea-Tac is not Needed, Causes Harm**
- 21 **and Does Not Solve Regional Problems**
- 22 **EXHIBIT M Drop In Sea-Tac Aircraft Operations Through August 2001**
- 23
- 24

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**EXHIBIT A**

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**Dr. Stephen L. M. Hockaday**

- Professor Civil and Environmental Engineering, Cal Poly University, San Luis Obispo
- B.Sc. (Eng) University of London, Civil Engineering, First Class Honours
- M.S. University of California, Berkeley, Transportation Engineering
- Ph. D. University of California, Berkeley, Transportation Engineering
- C. Eng Chartered Engineer, Great Britain,
- P.E. Registered Professional Engineer, California (Traffic)
- P.E. Registered Professional Engineer, Oregon (Civil and Environmental)
- Fellow American Society of Civil Engineers
- Member Institute of Professional Engineers, New Zealand
- Member Institute of Transportation Engineers, United States of America
- Member Institution of Civil Engineers, Great Britain

Dr. Hockaday has more than 25 years of experience in many aspects of air and ground transportation research, planning, design, and operations for government, industry and universities.

Dr. Hockaday is a Professor in the Civil and Environmental Engineering Department at California Polytechnic State University, San Luis Obispo (Cal Poly); where his responsibilities include teaching and research in air and ground transportation. He is also Director of the College

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1 of Engineering Applied Research and Development Facility. He is currently conducting air  
2 traffic management research for NASA, focusing on the need for co-ordination between airport  
3 arrival and departure runway management functions.

4 For four years, he was on leave from Cal Poly and worked for the airspace and navigation  
5 division of Eurocontrol, an international organisation with 28 member countries that assists in  
6 the development and harmonisation of the airport and airspace infrastructure in Europe. Dr.  
7 Hockaday was Head of Eurocontrol's airspace and airport modelling service, where his  
8 responsibilities included development and application of innovative real-time and fast-time  
9 simulation models in support of European airport and airspace system development. Among his  
10 responsibilities were the Brussels International Airport capacity study and the free routes airspace  
11 programme for northern Europe.

12  
13 Dr. Hockaday has extensive practical experience in the field of airport and airspace planning and  
14 design, as an individual consultant, as manager of an airport planning group for a major U.S.  
15 consulting firm, and for Eurocontrol.

16 His technical areas of responsibility have included:

- 17  
18 · Air Traffic Management  
19 · Airspace Planning and Design  
20 · Airspace Route Network Development  
21 · Controller Workload and Sector Capacity Assessment  
22 · Area Navigation System Impact Studies  
23 · Airborne Collision Risk Assessment

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- 1 · Air Route Charge Calculation
- 2 · Air Traffic Central Flow Management
- 3 · Airport Site Selection Studies
- 4 · Airport Systems Planning
- 5 · Airport Access and Parking
- 6 · Airport Land Use and Master Plans
- 7 · Airfield and Airspace Capacity and Layout Plans
- 8 · Passenger Terminal Area Plans
- 9 · Aviation Safety Analysis
- 10 · Environmental Assessment and Impact Studies

11

12 Representative Projects

13

14 Dr. Hockaday was project manager for the planning phase of the Eurocontrol 8-States Free Route

15 Airspace Project. In this role he has managed development of the operational concept, flight

16 planning and controller decision-aid system support, and project development activities for free

17 route airspace implementation in Belgium, Denmark, Finland, Germany, Luxembourg,

18 Netherlands, Norway, and Sweden. The project is expected to eventually extend to the upper

19 airspace of 28 European countries, and to provide direct or other user-preferred routes to aircraft

20 operators in these countries.

21 Dr. Hockaday was project manager for a five year FAA airport improvement program which

22 examined and recommended major development programs to improve the efficiency of

23 operations at the nation's ten busiest airports, including revisions to air traffic control procedures.

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25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 20

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AR 000103

1 The program resulted in significant delay reductions and operating cost savings at San Francisco  
2 International Airport, Dallas Fort Worth Regional Airport, John F. Kennedy International Airport  
3 and LaGuardia Airport (New York), William B. Hartsfield Atlanta International Airport, O'Hare  
4 International Airport (Chicago), Stapleton International Airport (Denver), Lambert St. Louis  
5 International Airport, Miami International Airport, and Los Angeles International Airport.

6 In a major project for the Federal Aviation Administration, Dr. Hockaday was technical manager  
7 of research and development performed for the FAA in which procedures were designed to  
8 determine airport capacity and improve airfield configurations. This project resulted  
9 in an airfield capacity handbook and mathematical models of airfield operations. The handbook  
10 and models were published by the FAA as an Advisory Circular which contains FAA approved  
11 airfield analysis techniques. As part of this work, he collected operational data from ATCT  
12 observations at airports including Santa Monica Airport, San Francisco International Airport, and  
13 Los Angeles International Airport.

14 He acted as project manager for an Air Force Communications Command project to develop new  
15 control procedures to improve air traffic control procedures in Europe and Asia. This project  
16 involved the use of a combination of live field tests using F-16 and other aircraft and computer  
17 modeling to demonstrate the feasibility of reduced separations between aircraft. The project  
18 included the development and documentation of pilot and controller procedure handbooks and  
19 training syllabuses, and coordination of ATC procedures with the command control function in a  
20 wartime environment. The procedures have been implemented worldwide.

21  
22 Dr. Hockaday also conducted research for the US Department of Transportation and the Federal  
23 Aviation Administration concerning the potential for automation of elements of the air traffic

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**AR 000104**



1 control system, particularly with reference to the possibility of incorporating artificial intelligence  
2 techniques. As part of this activity, he investigated the feasibility of incorporating expert systems  
3 into the FAA national air traffic central flow control facility. He also chaired a NASA/FAA  
4 workshop on the use of artificial intelligence in air traffic control.

5 For the US Navy, Dr. Hockaday participated in a study to update the naval aviation system plan  
6 for the helicopter and fixed-wing aircraft bases that provide basic aircrew training for all Navy  
7 pilots.

8  
9 For the Federal Aviation Administration, Dr. Hockaday conducted an assessment of the avionics  
10 capabilities of the rotorcraft fleet, and their impact on the demand for instrument operations by  
11 helicopters.

12  
13 For the Denver Regional Council of Governments and the City and County of Denver, Dr.  
14 Hockaday had major technical responsibilities for elements of (a) the Site Selection and Master  
15 Plan studies performed to identify and develop the new major air carrier airport to serve the  
16 Denver region, and (b) the Master Plan to develop the existing Stapleton International Airport.  
17 The studies involved detailed assessment of the alternative future roles of the two airports, and  
18 development of plans for their development. Plans were also developed for a new short runway  
19 for commuter aircraft operations.

20 For the Director General of Airports of the Government of Mexico, Dr. Hockaday was project  
21 manager for the development of plans for improvements to the existing Mexico City  
22 International Airport and the development of a new He was also responsible for major technical  
23 elements of the Minnesota State Airspace Study, the Minneapolis-St. Paul International Airport

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**AR 000105**

1 Long Term Comprehensive Plan, and the Metropolitan Airports Commission Dual Track Airport  
2 Planning Process (including the site selection and airport configuration studies for the new  
3 international airport). airport for Mexico City. The analyses included economic analysis and  
4 forecasting of aviation demand, capacity and delay analyses, establishment of requirements for  
5 new airport facilities, planning of airfield layout, terminal building concept, access and parking  
6 facilities, and airport land use.

7 In connection with the planning project for developing new terminal facilities at Orlando  
8 International Airport, Dr. Hockaday evaluated the potential of alternative terminal sites by  
9 analyzing geometric, land use, economic, environmental, and financial factors. He also  
10 organized and supervised a comprehensive airport data gathering program that involved  
11 passenger, vehicular traffic, and operations surveys; investigated alternative modes for airport  
12 access, and airfield and airspace capacity analyses.

13 For the Federal Aviation Administration, Dr. Hockaday was involved in several elements of the  
14 development of a Master Plan for Dulles International Airport, Washington, D.C., including  
15 airfield layout, terminal building development, access and parking, and airspace analysis.  
16

17 Dr. Hockaday was also project manager for a NASA study of ways to improve airport runway  
18 use and operation. The study included analysis of operational, physical, and technological  
19 improvements to the airport, airspace, and aircraft.

20  
21 For the U. S. Department of Transportation, the State of Missouri, and the St. Louis Airport  
22 Authority; Dr. Hockaday had major responsibilities for elements of several studies including: an  
23

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1 assessment of a proposed site for a major new air carrier airport and planning for the  
2 improvement of the existing Lambert St. Louis International Airport.

3 For NASA (National Aeronautics and Space Administration), Dr. Hockaday was responsible for  
4 a study that assessed the national impact of aircraft noise, and the benefit to be obtained from  
5 new technologies that could reduce aircraft noise at source. Analysis of aircraft and airspace  
6 operations and aircraft noise impacts at case study airports provided data for determination of  
7 national impacts; including John Wayne Orange County Airport, Minneapolis-St. Paul  
8 International Airport and Los Angeles International Airport.

9  
10 He has had a wide range of responsibilities and provided consultation services at numerous  
11 airports, including those in the following communities:

12  
13 United States

14 Anchorage	Atlanta
15 Boston	Charleston
16 Chicago	Cleveland
17 Dallas	Denver (DEN, DIA)
18 Detroit	El Paso
19 Honolulu	Houston
20 Kansas City	Los Angeles
21 Louisville	Memphis
22 Miami	Minneapolis
23 Monterey	Nashville

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New York (JFK,LGA)	Ogden
Orange County	Orlando
Palm Beach	Pensacola
Phoenix	Philadelphia
Portland	Raleigh-Durham
Sacramento	San Francisco
Santa Fe	San Jose
Seattle	St. Louis
Tampa	Washington DC (IAD)

International

Belgium	Germany
Great Britain	Greece
Hong Kong	Japan
Malaysia	Mexico
New Zealand	Philippines

Background

Dr. Hockaday is Professor of Civil and Environmental Engineering at California Polytechnic State University, San Luis Obispo. In this position, he has conducted applied research and taught gradate and under-graduate classes in air and surface transportation. He served for six years as

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1 Chair of the Department. He was principal investigator for the construction of a new applied  
2 engineering research building for the College of Engineering, and has been successful in securing  
3 the necessary resources from the National Science Foundation, the Keck Foundation and from  
4 several industrial parties, including Lockheed-Martin and Northrop-Grumman Aerospace.

5 Prior to his appointment at Cal Poly University, Dr. Hockaday was an Associate Research  
6 Engineer and Lecturer at the University of California, Berkeley. In this role he was responsible  
7 for developing and conducting graduate courses in air transportation, and for performing air  
8 transportation research.

9  
10 As a result of study and research at the University of California at Berkeley, he received both the  
11 M.S. and Ph.D. degrees in transportation engineering. Dr. Hockaday's thesis, supervised by  
12 Professor Robert Horonjeff, concerned a model to investigate the separation of landing aircraft  
13 with special reference to collision risk.

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**EXHIBIT B**

**Airport Town Fears What May Happen If Air Travelers Continue to Stay Home**  
The Wall Street Journal 09/26/01 Robert Gavin

SEATAC, Wash. -- Here, where the city is named after the airport instead of the other way around, the economic pinch of declining air travel is being felt as in few other places.

Incorporated in 1990, SeaTac's borders were drawn to ensure a substantial flow of tax revenues by encompassing both its namesake, Seattle-Tacoma International Airport, commonly called Sea-Tac, and the hotels, parking lots and restaurants that surround it. Today, airport and travel-service businesses account for nearly 75% of the city's tax collections, and that dependence has city officials worried as the Sept. 11 terrorist attacks keep air travelers at home.

**'A Little Nervous'**

Air traffic at Sea-Tac airport is down about 15%, according to the Port of Seattle. And Elizabeth Spencer, finance director for the city of SeaTac, is estimating tax revenues could fall \$3.3 million, or 15%, next year unless air traffic picks up. In the short term, the city, with a \$10 million operating-budget surplus, can absorb such a loss. But, admits Ms. Spencer, "I'm a little nervous. It's hard to say what the long-term reaction [to the attacks] will be."

Ms. Spencer, of course, isn't the only local official nervous about air travel and the impact on revenues. In many cities that derive a big chunk of their revenue from an airport within their boundaries, officials are anticipating that reduced air traffic will mean reduced revenues.

In the county of Arlington, Va., home of still-closed Reagan National Airport, across the Potomac River from Washington, D.C., officials estimate the county is losing tax revenues at a rate of at least \$700,000 a month -- or about \$8.3 million a year -- from businesses that operate at or near the airport.

With an expected surplus on the annual budget of nearly \$400 million a year, Arlington officials believe they can absorb that loss in the short term without much trouble, but they're worried about an extended closure of Reagan National. The airport hasn't reopened because of security concerns.

And Jay Fisette, chairman of the county board, notes the revenue estimates are based solely on direct losses to businesses at or near the airport; they don't include yet-to-be-determined indirect

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1 effects, such as losses to companies that supply airport businesses. "We know there will be an  
2 impact, so our focus is getting the airport reopened," he says.

3 In SeaTac, nearly all the effects of the drop in air travel will be felt directly. The city's leading  
4 employers are nearly all airlines. The biggest is Alaska Airlines, a unit of Seattle-based Alaska  
5 Air Group Inc. Alaska Airlines operates about 25% of all flights in and out of Sea-Tac. A  
6 spokesman for Alaska Airlines, which has its headquarters here and employs more than 5,500 in  
7 SeaTac, says the airline is operating about 85% of its schedule. But it hasn't laid off any  
8 employees and has no plans to do so, he adds.

9 About 40% of SeaTac's property taxes, or \$3 million a year, are paid by airlines, which are  
10 assessed, in part, according to the number of people the airlines fly into the airport.

11 The city also collects \$1 dollar for every car that parks in airport or satellite lots, generating  
12 nearly \$5 million a year, about 20% of total tax collections. Hotel- and motel-room taxes --  
13 SeaTac has 6,300 rooms -- generate nearly \$1 million more.

#### 14 Business Is Off

15 Matthew Murphy, executive vice president of Parmount Hotels LLC, which operates a 146-  
16 room hotel in SeaTac, and Master Park LLC, which has three parking lots, says the businesses  
17 were already feeling the slowing economy, and the terrorist attacks have slowed things even  
18 more. "There is an abundance of spaces and rooms in the market right now," says Mr. Murphy,  
19 "but it's too soon for us to know for how long." He and other hotel and parking-lot operators say  
20 business is off 20% to 30%.

21 Jay Holman, an assistant city manager, says SeaTac was well on its way to preparing a budget  
22 for the fiscal year that begins Jan. 1, but now the falloff in air travel following the terrorist attacks  
23 will require city officials to "take another look" at proposed spending.

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DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY

HELSELL FETTERMAN LLP  
1500 Puget Sound Plaza  
1325 Fourth Avenue

Rachael Paschal Osborn  
Attorney at Law  
2421 West Mission Avenue

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AR 000111

## EXHIBIT C

### Horizon Air and Alaska Air Seattle Flight Cancellations

#### (1) Horizon Air Seattle Flight Cancellations (September 17 — October 20, 2001)

Flight	Departs	Arrives	Cancelled	Effective Period
2271	Bellingham 8:30 am	Seattle 9:10 am	Mon-Sat	9/17/01 - 10/20/01
2011	Bellingham 12:10 pm	Seattle 12:50 pm	All Week	9/17/01 - 10/20/01
2411	Billings 1:10 pm	Seattle 2:03 pm	Mon-Fri & Sat	9/17/01 - 10/20/01
2501	Boise 6:40 am	Seattle 6:59 am	Mon-Fri	9/17/01 - 10/20/01
2519	Boise 7:10 pm	Seattle 7:30 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
2346	Calgary 3:25 pm	Seattle 3:59 pm	All Week	9/17/01 - 10/20/01
2539	Edmonton 11:00 am	Seattle 11:40 am	All Week	9/17/01 - 10/20/01
2156	Eugene 8:50 pm	Seattle 9:59 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
2486	Helena 1:50 pm	Seattle 2:25 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
2179	Kelowna 2:35 pm	Seattle 3:45 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
2301	Lewiston 10:30 am	Seattle 11:45 am	Mon-Fri	9/17/01 - 10/20/01
2130	Medford 5:10 pm	Seattle 6:45 pm	Sat	9/17/01 - 10/20/01
2114	Medford 7:55 pm	Seattle 9:30 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
2329	Missoula 8:15 pm	Seattle 8:50 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
2117	Pasco 9:45 am	Seattle 10:40 am	All Week	9/17/01 - 10/20/01
2141	Pasco 4:40 pm	Seattle 5:35 pm	All Week	9/17/01 - 10/20/01
2061	Port Angeles 10:35 am	Seattle 11:10 am	Mon-Fri & Sun	9/17/01 - 10/20/01
2232	Portland 6:00 am	Seattle 6:55 am	Mon-Fri	9/17/01 - 10/20/01
2361	Portland 7:00 am	Seattle 7:50 am	All Week	9/17/01 - 10/6/01
2240	Portland 7:30 am	Seattle 8:25 am	Mon-Fri	9/17/01 - 10/20/01
2252	Portland 8:30 am	Seattle 9:25 am	Mon-Fri & Sun	9/17/01 - 10/20/01
2363	Portland 10:00 am	Seattle 10:50 am	Mon-Fri	9/17/01 - 10/20/01
2002	Portland 11:30 am	Seattle 12:25 pm	All Week	9/17/01 - 10/20/01
2168	Portland 12:00 pm	Seattle 12:55 pm	Mon-Fri	9/17/01 - 10/20/01
2034	Portland 2:30 pm	Seattle 3:20 pm	All Week	9/17/01 - 10/20/01
2110	Portland 3:00 pm	Seattle 3:50 pm	All Week	9/17/01 - 10/20/01
2185	Portland 5:00 pm	Seattle 5:55 pm	Mon-Fri	9/17/01 - 10/20/01
2326	Portland 6:00 pm	Seattle 6:50 pm	Mon-Fri	9/17/01 - 10/20/01
2196	Portland 8:30 pm	Seattle 9:25 pm	Mon-Fri	9/17/01 - 10/20/01
2126	Portland 10:30 pm	Seattle 11:20 pm	Mon-Fri	9/17/01 - 10/20/01
2367	Portland 4:00 pm	Seattle 4:50 pm	Sat	9/29/01 9/29/01
2367	Portland 4:00 pm	Seattle 4:50 pm	Sat	10/13/01 - 10/20/01
2302	Pullman/Moscow 2:35 pm	Seattle 3:40 pm	Sat	09/22/01 - 9/22/01
2302	Pullman/Moscow 2:30 pm	Seattle 3:45 pm	Sat & Sun	9/23/01 - 10/20/01
2302	Pullman/Moscow 2:35 pm	Seattle 3:40 pm	Sat	10/6/01 - 10/6/01

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AR 000112



1	2372	Seattle 6:30 am	Spokane 7:30 am Sat	9/17/01 - 10/20/01
	2089	Seattle 7:00 am	Portland 7:50 am Mon-Fri	9/17/01 - 10/20/01
2	2232	Seattle 7:25 am	Bellingham 8:05 am Mon-Sat	9/17/01 - 10/20/01
	2022	Seattle 7:30 am	Walla Walla 8:35 am Mon-Sat	9/17/01 - 10/20/01
3	2540	Seattle 7:35 am	Edmonton 10:10 am All Week	9/17/01 - 10/20/01
	2381	Seattle 8:30 am	Portland 9:20 am Mon-Fri	9/17/01 - 10/6/01
4	2116	Seattle 8:30 am	Pasco 9:25 am All Week	9/17/01 - 10/20/01
	2204	Seattle 8:30 am	Wenatchee 9:10 am All Week	9/17/01 - 10/20/01
5	2230	Seattle 8:30 am	Vancouver 9:20 am Mon-Sat	9/17/01 - 10/20/01
6	2301	Seattle 8:30 am	Pullman/Moscow 9:40am Mon-Fri	9/17/01 - 10/20/01
	2186	Seattle 9:00 am	Portland 9:50 am Mon-Fri	9/17/01 - 10/20/01
7	2084	Seattle 9:40 am	Port Angeles 10:15am Mon-Fri & Sun	9/17/01 - 10/20/01
	2260	Seattle 10:00 am	Portland 10:50 am Mon-Fri	9/17/01 - 10/20/01
8	2140	Seattle 10:30 am	Vancouver 11:20 am All Week	9/17/01 - 10/20/01
	2171	Seattle 11:11 am	Bellingham 11:50 am All Week	9/17/01 - 10/20/01
9	2364	Seattle 11:30 am	Portland 12:20 pm Mon-Fri	9/17/01 - 10/20/01
10	2345	Seattle 12:12 pm	Calgary 2:45 pm All Week	9/17/01 - 10/20/01
	2504	Seattle 12:20 pm	Boise 2:40 pm Mon-Fri	9/17/01 - 10/20/01
11	2002	Seattle 1:05 pm	Yakima 1:50 pm All Week	9/17/01 - 10/20/01
	2011	Seattle 1:30 pm	Portland 2:20 pm All Week	9/17/01 - 10/20/01
12	2086	Seattle 2:00 pm	Portland 2:50 pm Mon-Fri	9/17/01 - 10/20/01
13	2376	Seattle 2:00 pm	Spokane 2:59 pm All Week	9/17/01 - 10/20/01
	2402	Seattle 2:35 pm	Billings 5:20 pm Mon-Fri & Sun	9/17/01 - 10/20/01
14	2277	Seattle 3:00 pm	Spokane 3:59 pm All Week	9/17/01 - 10/20/01
	2466	Seattle 3:05 pm	Helena 5:35 pm Mon-Fri & Sun	9/17/01 - 10/20/01
15	2043	Seattle 3:20 pm	Medford 4:50 pm Sat	9/17/01 - 10/20/01
16	2102	Seattle 3:25 pm	Pasco 4:20 pm All Week	9/17/01 - 10/20/01
	2036	Seattle 3:30 pm	Vancouver 4:20 pm All Week	9/17/01 - 10/20/01
17	2165	Seattle 3:30 pm	Portland 4:20 pm All Week	9/17/01 - 10/20/01
	2034	Seattle 3:50 pm	Yakima 4:30 pm All Week	9/17/01 - 10/20/01
18	2070	Seattle 4:05 pm	Victoria 4:45 pm All Week	9/17/01 - 10/20/01
	2518	Seattle 4:15 pm	Boise 6:30 pm Mon-Fri & Sun	9/17/01 - 10/20/01
19	2030	Seattle 4:30 pm	Vancouver 5:20 pm Mon-Fri & Sun	9/17/01 - 10/20/01
20	2327	Seattle 4:30 pm	Portland 5:20 pm Mon-Fri	9/17/01 - 10/20/01
	2180	Seattle 4:35 pm	Kelowna 5:45 pm Mon-Fri & Sun	9/17/01 - 10/20/01
21	2338	Seattle 5:25 pm	Missoula 7:45 pm Mon-Fri & Sun	9/17/01 - 10/20/01
	2368	Seattle 5:30 pm	Portland 6:20 pm Sat	9/17/01 - 10/20/01
22	2123	Seattle 5:50 pm	Medford 7:20 pm Mon-Fri & Sun	9/17/01 - 10/20/01
23	2223	Seattle 6:00 pm	Portland 6:50 pm All Week	9/17/01 - 10/20/01
	2049	Seattle 6:30 pm	Spokane 7:35 pm Mon-Fri & Sun	9/17/01 - 10/20/01

24  
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1	2157	Seattle 6:30 pm	Portland 7:20 pm	Mon-Fri	9/17/01 - 10/20/01
	2133	Seattle 7:22 pm	Eugene 8:30 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
2	2124	Seattle 7:40 pm	Vancouver 8:30 pm	All Week	9/17/01 - 10/20/01
	2264	Seattle 8:20 pm	Wenatchee 9:05 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
3	2293	Seattle 8:30 pm	Portland 9:20 pm	Mon-Fri	9/17/01 - 10/20/01
	2048	Seattle 9:25 pm	Victoria 10:05 pm	All Week	9/17/01 - 10/20/01
4	2236	Seattle 10:00 pm	Portland 10:50 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
	2392	Seattle 8:00 am	Spokane 8:59 am	Sat	9/22/01 - 9/22/01
5	2394	Seattle 11:00 am	Spokane 11:59 am	Sat	9/22/01 - 9/22/01
	2302	Seattle 12:30 pm	Lewiston 1:35 pm	Sat	9/22/01 - 9/22/01
6	2302	Seattle 12:32 pm	Lewiston 1:40 pm	Sat & Sun	9/23/01 - 10/20/01
	2392	Seattle 8:00 am	Spokane 8:59 am	Sat	10/6/01 - 10/6/01
7	2394	Seattle 11:00 am	Spokane 11:59 am	Sat	10/6/01 - 10/6/01
	2302	Seattle 12:30 pm	Lewiston 1:35 pm	Sat	10/6/01 - 10/6/01
8	2371	Spokane 5:00 am	Seattle 6:00 am	Sat	9/17/01 - 10/20/01
9	2395	Spokane 12:30 pm	Seattle 1:30 pm	All Week	9/17/01 - 10/20/01
10	2172	Spokane 4:30 pm	Seattle 5:40 pm	All Week	9/17/01 - 10/20/01
	2195	Spokane 8:30 pm	Seattle 9:45 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
11	2393	Spokane 9:30 am	Seattle 10:30 am	Sat	9/22/01 - 9/22/01
	2377	Spokane 3:30 pm	Seattle 4:30 pm	Sat	9/22/01 - 9/22/01
12	2393	Spokane 9:30 am	Seattle 10:30 am	Sat	10/6/01 - 10/6/01
	2377	Spokane 3:30 pm	Seattle 4:30 pm	Sat	10/6/01 - 10/6/01
13	2191	Vancouver, BC 7:10 am	Seattle 7:59 am	All Week	9/17/01 - 10/20/01
14	2127	Vancouver, BC 9:00 am	Seattle 9:50 am	All Week	9/17/01 - 10/20/01
	2049	Vancouver, BC 5:00 pm	Seattle 5:50 pm	All Week	9/17/01 - 10/20/01
15	2215	Vancouver, BC 6:00 pm	Seattle 6:50 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
16	2231	Vancouver, BC 9:10 pm	Seattle 9:59 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
	2073	Victoria 7:35 am	Seattle 8:15 am	All Week	9/17/01 - 10/20/01
17	2050	Victoria 2:35 pm	Seattle 3:15 pm	All Week	9/17/01 - 10/20/01
	2021	Walla Walla 9:20 am	Seattle 10:30 am	Mon-Sat	9/17/01 - 10/20/01
18	2119	Wenatchee 6:40 am	Seattle 7:24 am	Mon-Sat	9/17/01 - 10/20/01
19	2091	Wenatchee 9:30 am	Seattle 10:15 am	All Week	9/17/01 - 10/20/01
	2165	Yakima 2:15 pm	Seattle 2:55 pm	All Week	9/17/01 - 10/20/01
20	2223	Yakima 4:50 pm	Seattle 5:30 pm	All Week	9/17/01 - 10/20/01

21 **(2) Alaska Airlines Seattle Flight Cancellations (September 22 - 29, 2001)**

22 **Flight** **Departs** **Arrives**  
23 124 Anchorage 6:15 am Seattle/Tacoma 2:37 pm (exception: operates  
24 Sat)

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1	Sat)	94	Anchorage 11:35 am	Seattle/Tacoma 3:57 pm (exception: operates
2		196	Anchorage 9:45 pm	Seattle/Tacoma 1:52 am
		499	Burbank 10:23 am	Seattle 1:00 pm
3		663	Las Vegas 9:15 am	Seattle/Tacoma 11:52 am
		693	Las Vegas 5:30 pm	Seattle/Tacoma 7:59 pm
4		661	Las Vegas 11:05 pm	Seattle/Tacoma 1:34 am
		423	Los Angeles (LAX) 6:15 am	Seattle 8:51 am
5		479	Los Angeles (LAX) 7:00 am	Seattle 9:36 am (exception: operates Sun and
6	Mon-Fri)			
		595	Los Angeles (LAX) 10:30 am	Seattle 1:02 pm
7		579	Los Angeles (LAX) 2:35 pm	Seattle 6:22 pm
		599	Los Angeles (LAX) 5:30 pm	Seattle 8:06 pm (exception: operates Sun and
8	Mon-Fri)			
		475	Los Angeles (LAX) 6:30 pm	Seattle 9:04 pm
9		293	Los Angeles (LAX) 7:00 pm	Seattle 9:34 pm
10		481	Los Angeles (LAX) 8:45 pm	Seattle 11:22 pm
		393	Oakland 6:15 am	Seattle/Tacoma 8:15 am
11		395	Oakland 12:28 pm	Seattle/Tacoma 2:20 pm
		433	Oakland 8:00 pm	Seattle/Tacoma 9:55 pm
12		513	Ontario, CA 3:35 pm	Seattle/Tacoma 6:05 pm
		493	Orange County 7:23 pm	Seattle/Tacoma 9:58 pm
13		759	Phoenix 1:40 pm	Seattle/Tacoma 4:32 pm
14		731	Phoenix 6:42 pm	Seattle/Tacoma 9:42 pm
		323	Portland 12:15 pm	Seattle/Tacoma 1:07 pm
15		621	Reno 9:22 am	Seattle/Tacoma 11:09 am
		353	Sacramento 11:26 am	Seattle/Tacoma 1:12 pm
16		427	Sacramento 11:26 am	Seattle/Tacoma 1:12 pm
		349	Sacramento 2:56 pm	Seattle/Tacoma 4:42 pm
17		525	San Diego 5:11 pm	Seattle/Tacoma 7:56 pm
18		563	San Diego 9:00 pm	Seattle/Tacoma 11:40 pm
		325	San Francisco 11:55 am	Seattle/Tacoma 1:53 pm
19		379	San Francisco 2:18 pm	Seattle/Tacoma 4:13 pm
20		199	San Francisco 5:41 pm	Seattle/Tacoma 7:37 pm
		347	San Jose 8:15 pm	Seattle/Tacoma 10:21 pm
21		650	Seattle/Tacoma 6:05 am	Las Vegas 8:29 am
		434	Seattle/Tacoma 6:15 am	Portland 7:03 am
22		798	Seattle/Tacoma 6:30 am	San Jose 8:35 am
23		236	Seattle/Tacoma 6:45 am	Los Angeles 9:28 am
		604	Seattle/Tacoma 7:05 am	Reno 8:47 am

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- 32

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AR 000115

1	87	Seattle/Tacoma 8:00 am	Anchorage 10:47 am (exception: operates Sat)
	474	Seattle/Tacoma 8:45 am	Los Angeles 11:14 am (exception: operates Sun
2		and Mon-Fri)	
3	350	Seattle/Tacoma 9:00 am	Sacramento 10:50 am
4	344	Seattle/Tacoma 9:15 am	San Francisco 11:19 am
5	582	Seattle/Tacoma 9:45 am	Los Angeles 12:19 pm
6	462	Seattle/Tacoma 9:50 am	Oakland 11:50 am
7	415	Seattle/Tacoma 9:55 am	Portland 10:42 am (exception: operates Sun)
8	423	Seattle/Tacoma 10:00 am	Spokane 10:57 am
9	752	Seattle/Tacoma 10:15 am	Phoenix 1:02 pm
10	124	Seattle/Tacoma 11:30 am	Portland 12:17 pm
11	386	Seattle/Tacoma 11:35 am	San Francisco 1:42 pm
12	502	Seattle/Tacoma 12:15 pm	Los Angeles 2:55 pm
13	324	Seattle/Tacoma 12:30 pm	Sacramento 2:20 pm
14	512	Seattle/Tacoma 12:35 pm	Ontario, CA 3:00 pm
15	2	Seattle/Tacoma 12:45 pm	Washington, DC 8:35 pm
16	425	Seattle/Tacoma 1:00 pm	Spokane 1:58 pm
17	524	Seattle/Tacoma 1:50 pm	San Diego 4:29 pm
18	690	Seattle/Tacoma 2:30 pm	Las Vegas 4:51 pm
19	392	Seattle/Tacoma 3:05 pm	San Francisco 5:05 pm
20	454	Seattle/Tacoma 3:15 pm	Los Angeles 5:48 pm
21	748	Seattle/Tacoma 3:15 pm	Phoenix 6:04 pm
22	496	Seattle/Tacoma 4:10 pm	Orange County 6:47 pm
23	472	Seattle/Tacoma 5:15 pm	Los Angeles 7:52 pm
24	390	Seattle/Tacoma 5:20 pm	Oakland 7:22 pm (exception: operates Sat)
25	453	Seattle/Tacoma 5:30 pm	Spokane 6:25 pm
26	560	Seattle/Tacoma 5:45 pm	San Diego 8:24 pm (exception: operates Sat)
27	448	Seattle/Tacoma 7:30 pm	Los Angeles 10:08 pm (exception: operates Sun
28		and Mon-Fri)	
29	660	Seattle/Tacoma 8:10 pm	Las Vegas 10:30 pm
30	378	Seattle/Tacoma 9:00 pm	San Jose 10:51 pm
31	475	Seattle/Tacoma 10:00 pm	Spokane 10:55 pm
32	398	Seattle/Tacoma 10:05 pm	Oakland 12:02 am
33	87	Spokane 6:00 am	Seattle/Tacoma 7:02 am (exception: operates
34		Sat)	
35	404	Spokane 11:30 am	Seattle/Tacoma 12:32 pm
36	335	Spokane 2:30 pm	Seattle/Tacoma 3:30 pm
37	378	Spokane 7:00 pm	Seattle/Tacoma 8:00 pm
38	739	Tucson 11:38 am	Seattle/Tacoma 2:43 pm
39	1	Washington, DC 7:59 am	Seattle/Tacoma 11:10 am

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**EXHIBIT D**

Wednesday October 3 10:11 PM ET  
**Alaska Airlines Traffic Is Down**

SEATTLE (AP) - Alaska Airlines said passenger traffic decreased 18.7 percent in September, compared with the same month last year, as the airline grappled with fallout from the Sept. 11 terrorist attacks.

The Seattle-based airline, a subsidiary of Alaska Air Group, said it operated 76 percent of its normal flight schedule during the month, echoing a trend across the airline industry.

Airplanes were grounded for two days following the attacks, and a fear of flying kept many would-be travelers out of the skies once the Federal Aviation Administration allowed commercial air traffic to resume.

The airline said its passenger load factor - the percentage of available seats used - was 60.7 percent, compared with 62.7 percent in the same month last year.

Horizon Airlines, the commuter airline also owned by Alaska Air Group, saw a steeper, 31.7 percent decrease in passenger traffic in September.

That airline was flying at 77 percent of its normal flight schedule and said its load factor was just 54.8 percent for the month. That compares with 59.1 percent in September of last year.

Airlines across the country have announced layoffs and cut back flight schedules following the attacks, which crippled the already ailing industry. Many airlines have sought help from a government bailout plan.

Alaska has managed to avoid the worst of these economic effects, thanks to a hefty cash reserve.

<http://www.alaskaair.com>

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**AR 000117**

**EXHIBIT E**

Wednesday October 3 6:46 PM ET  
**United Airlines Eliminates Shuttle**

CHICAGO (AP) - United Airlines said Wednesday it would discontinue its United Shuttle brand and incorporate some of those flights into United and United Express schedules.

How many flights would be eliminated was not yet certain and the schedule of the remaining flights was still being developed, United spokesman Joe Hopkins said. The cutbacks would take place by at the end of October.

United said the cutback and other recent service changes are due to reduced passenger demand in the wake of terrorist attacks Sept. 11.

The airline said Monday it will downgrade service in several cities at end of the month.

Since Sept. 11, it has reduced its schedule from 2,400 daily flights to 1,900. It also has said it will cut at least 20 percent of its work force of about 100,000.

United Shuttle operates mostly in the West, using a fleet of 59 Boeing 737 airplanes. Before Sept. 11, it offered about 468 daily flights.

United said it continues to adjust its operation to reflect softened demand.

Eliminating the Shuttle allows United to switch smaller and larger jets between markets based on passenger demand, said Christopher D. Bowers, United Airlines' senior vice president for North America.

"Our goal is to maintain the best possible schedules for customers and communities that rely on United for service, while maintaining flexibility to fine-tune our capacity to meet demand," he said.

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**AR 000118**

1 **EXHIBIT F**

2 **Dallas Morning News 100101**  
3 **Airlines Scrambling to Survive**

4 Dallas - The nation's airlines are flying into the future without a compass.

5 The world they faced Sept. 10 was gloomy but familiar. Fewer business travelers, high fuel  
6 prices and a faltering economy were the kinds of problems the carriers confront, and resolve, year  
7 after year.

8 But after the Sept. 11 terrorist attacks that grounded airlines nationwide, no one knows where the  
9 industry must go. Not five years from now. Not six months from now. Not a week from now.  
10 "The future right now is this afternoon," said airline consultant Darryl Jenkins. "That's long-term  
11 planning now."

12 Everything has changed. The question isn't what airplanes to buy, but which airplanes to park. A  
13 hiring binge for the past five years has turned into a firing frenzy. Executives aren't trying to  
14 tweak the bottom line; they're trying to preserve enough cash to stay in business.

15 "The losses we face are truly staggering," said Donald J. Carty, chairman of American Airlines,  
16 in a letter to employees. "They exceed anything we ever imagined at American. Right now it is  
17 survival, not profitability, that is our core challenge."

18 Almost everyone is predicting that a number of airlines will fail, and that the surviving airlines  
19 will be smaller a year from now.

20 In 18 years at the helm of American, Robert L. Crandall coped with deregulation, soaring jet-fuel  
21 prices during the Persian Gulf War, several recessions and terrorist scares that cut into traffic.  
22 None of that, Crandall said, compares with the current situation.

23 "This is clearly the worst single event of our lifetime, probably the worst single event of this  
24 century. It's changed public perceptions about air travel and the general feeling of safety in the  
25 United States overall. This is substantially worse than all those problems," said Crandall, who  
26 retired in 1998 as chairman and chief executive.

27 "Nonetheless, I think the industry is very resilient and the economy is strong, assuming we do the  
28 right things. I think five years from now we'll be back on track."

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**AR 000119**

1 Delta Air Lines chairman and Chief Executive Officer Leo Mullin had top officials working on  
2 company strategy the week before the terrorist attacks. After the attacks, "We defined a series of  
3 questions we now need to address, and the questions bore no resemblance to each other," Mullin  
4 said.

5 Of course, other industries have suffered body blows that chewed through 100,000 jobs, as the  
6 first round of announced airline cuts will do. But what's striking about the post-Sept. 11 business  
7 climate is how swiftly and thoroughly it has staggered the airlines.

8 In a fortnight, the stock value of the 10 largest U.S. airlines fell nearly 30 percent, or more than  
9 \$8.5 billion. Less than six months after sealing the TWA acquisition that made American the  
10 nation's largest airline, Carty now talks of the carrier as "a company in crisis in an industry in  
11 crisis."

12 Airline officials and experts defined three periods that the industry will go through: the  
13 immediate aftermath as carriers cut costs to conserve cash; a second phase as they stabilize their  
14 operations over months and try to get passengers back; and a still-hazy long-term future in which  
15 the new industry structure gradually emerges.

16 David Treitel, chairman of airline consultants SH&E Inc., said the first job will be to stop the  
17 cash drain. The \$5 billion in federal financial aid will barely replace what the airlines have  
18 already lost since Sept. 11, he said.

19 "The whole industry's resources are being depleted very rapidly right now," Treitel said.

20 For almost every airline, survival means getting smaller - fast. American, Delta, Northwest  
21 Airlines, Continental Airlines and other are reducing their operations by 20 percent.

22 US Airways will slash its capacity 23 percent. United Airlines, which was going to cut its  
23 schedule 20 percent, upped the cuts Friday to 26 percent as traffic falloff was worse than it  
24 expected.

25 Airlines are now implementing job cuts, led by 20,000 at United. AMR Corp., parent of  
American, is also shedding 20,000 jobs, divided among American with 15,000, subsidiary TWA  
Airlines LLC with 3,000 and just under 2,000 at American Eagle Airlines.

Most carriers are drastically reducing on-board services as well, with meals disappearing from all  
but long-distance flights. Airlines are selectively dropping their least profitable destinations,  
reducing flights to other cities and substituting regional-carrier partners for mainline jets.

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1 And older jetliners such as Boeing 727s and McDonnell Douglas DC-9s that would have been  
idled over the next several years will be mothballed in a matter of months.

2 Soon, the new, smaller industry will be in place. Then what? The speed in which airlines get  
3 healthy is directly related to how quickly Americans decide to start flying again, industry officials  
4 say.

5 One problem, of course, is that the carriers already were hurting from the soft U.S. economy.  
6 Lucrative business travel was off sharply, and most airlines already were in the red. Analysts  
7 had been predicting that the industry would lose \$2 billion to \$2.5 billion this year - its first  
8 losing year since 1994.

9 Jenkins, director of the Aviation Institute at George Washington University in Washington, D.C.,  
10 predicts demand will return as the airlines start fare sales, travelers accept higher levels of  
11 security and the economy improves.

12 "In the next few weeks after we get over the grieving period and the mourning period, you will  
13 see airlines start discounting travel and doing things to get people back on planes and they'll be  
14 very aggressive," he said.

15 "A robust economy is an airline's best friend, and our economy is anything but robust right now.  
16 That will be the hardest thing in the short term to get people back on planes," Jenkins said.

17 Even after airlines shrink 20 percent or more, Wall Street expects the financial bleeding to  
18 continue through the middle of next year at least.

19 Airline analyst Brian Harris of Salomon Smith Barney predicts that airline revenue will fall 35  
20 percent in fourth quarter 2001 compared to the same period in 2000. His outlook for 2002 isn't  
21 much better: down 20 percent year over year in the first quarter, and 10 percent in the second.

22 Not until the third quarter does he expect airline revenues to be higher than the previous year.  
23 And it won't be a healthy comparison, because 2002's third quarter will be compared to this year's  
24 abysmal third quarter that included the terrorist attacks.

25 As a result, Harris forecasts every major carrier except Dallas-based Southwest Airlines Co. to  
lose money in 2001, and only Southwest and Continental to show a profit in 2002.

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**EXHIBIT G**

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**Business Digest Friday, September 28, 2001  
Alaska Airlines puts off Sea-Tac Hangar Project**

Alaska Airlines said yesterday that it is postponing adding a three-story wing to its Sea-Tac Airport maintenance hangar until airlines recover from the sudden drop in traffic and revenue.

The decision, which also postpones a related project to remodel 70,000 square feet of shops and other areas, will save the Seattle-based carrier roughly \$20 million, according to a statement posted on one of the company's Web sites yesterday.

"Our intent is to go forward with this project when the airline industry is stabilized," Alaska President Bill Ayer said in the statement.

Alaska added that it will complete some improvements already under way. The company also said it plans to make other cost-saving decisions.

<http://seattlepi.nwsource.com/search/PIsearch.asp?UserQuery=%22airport%22&page=3&rank=date>

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**EXHIBIT H**

October 8 2001 Business Week.

**PLANE TALK - Airports Are in a Holding Pattern**

It's not just airlines that are in deep trouble after the Sept. 11 terrorist attacks. Airports are hurting, too. In the weeks since the attack, officials in at least 14 cities--including Atlanta; Boston; Dallas; Detroit; Fort Lauderdale; Manchester, N.H.; Miami; Orlando; Raleigh, N.C.; Salt Lake City; San Francisco; and Tampa--have said that runway, terminal, and parking-deck expansions would be halted or placed under review.

Why? The attacks, as we know, have slashed air traffic for the time being. But more important, airport administrators are waiting for revised--and probably expensive--security requirements to be announced by Transportation Secretary Norman Mineta by Oct. 1. "We're trying to see what our new life will be," says James Koslowski, chairman of the American Association of Airport Executives. Vendors are also pulling out of contracts for fear that heightened security--such as barring friends and family from the gates--will severely cut into revenues. Some airports, at least, including three in Houston undergoing \$2.7 billion worth of expansions, will continue.

But there will be little help from the feds: The House Committee on Transportation & Infrastructure has put \$3.3 billion in funds earmarked for airport upgrades next year on hold. Looks as if air travel won't get easier anytime soon.

By Brian Grow

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**EXHIBIT I**

**Port budget to get \$20 million trim**

Copyright © 2001 The Seattle Times Company Local News : Thursday, October 04, 2001

By Janet I. Tu and Andrew Garber Seattle Times staff reporters

Facing sharply declining revenue and rising security costs, Port of Seattle officials said yesterday that layoffs at Seattle-Tacoma International Airport and in the Port's waterfront operations could be a possibility.

Port staff set a goal of cutting 10 percent — about \$20 million — from the agency's operating budget next year.

The Port operates the airport, where airline traffic dropped after the Sept. 11 terrorist attacks, and the sprawling container-cargo docks along Elliott Bay. At a commission meeting yesterday, Port officials said Sea-Tac's large capital projects — including the third runway — will proceed as planned.

To eliminate about \$13.5 million in airport costs, officials plan to cut outside consultancies and put off some maintenance. They also are scrutinizing programs, travel and perhaps staff.

On the seaport side, officials are seeking to cut about \$6.5 million from next year's budget. Revenues from container shipping and conventions will likely drop next year, said Steve Sewell, managing director of the Port's marine division. The Port owns the Bell Harbor International Conference Center, among other ventures.

"To get there, it's going to be extremely painful," Port of Seattle Executive Director Mic Dinsmore said of the 10 percent across-the-board cuts.

The airport has been operating the past few weeks at about 85 percent of the normal number of takeoffs and landings this time of year.

Before Sept. 11, airport officials had expected about \$210 million in revenue for 2001. They're now expecting only \$170 million.

Added security measures since the attacks and increased work hours by Port police will cost the airport about \$5 million from Sept. 11 to Dec. 31, said Gina Marie Lindsey, managing director of the airport.

The airport will proceed on its four main capital projects: building the third runway, expanding the South Terminal and the Central Terminal, and replacing satellite trains.

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1 "We're not going to stop those projects that have long-term strategic importance to us," Lindsey said.

2 The Port yesterday sold \$508 million in revenue bonds for airport capital projects. The bond sale, originally set for Sept. 12, was postponed after the terrorist attacks.

3  
4 Sea-Tac isn't the only airport in Washington facing financial hardship. Small and medium-size airports are getting hit especially hard.

5 United Express announced plans to pull out of the Yakima Air Terminal by the end of the month. The airline accounts for about a third of the airport's flights, said Bob Clem, the airport manager.

6  
7 The airport's income has dropped as much as 40 percent overall since the terrorist attacks, while its expenses have jumped 110 percent, he said.

8 Bellingham International Airport also is losing United Express service, said Carolyn Casey, an airport spokeswoman. The airline accounted for more than 40 percent of the airport's flights.

9  
10 "For us it's a pretty big deal to lose that service," she said. "We're going to lose their passenger fees, we're going to lose their fueling fees, we're going to lose all the collateral things those passengers did and bought."

11  
12 (Horizon Air also reduced service to Yakima, Bellingham and some other regional airports after the terrorist attacks.)

13  
14 The big question for everyone is how long it will take the airline industry and airports to recover.

15 "I think it will be years," said Darryl Jenkins, director of the Aviation Institute at George Washington University. "This is going to be a very long, slow process."

16  
17 Said Dinsmore, "I can't remember a time in the history of the Port when revenues dropped so quickly and costs rose so steeply."

18 *Janet I. Tu can be reached at 206-464-2272 or [jtu@seattletimes.com](mailto:jtu@seattletimes.com). Andrew Garber can be reached at 206-464-2595 or [agarber@seattletimes.com](mailto:agarber@seattletimes.com).*

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**EXHIBIT J**

**Moodys Puts Port of Seattle Bonds on Watch List for Downgrade**

**Current Rating List**

Section	Issue Date	Face	Underlying	Enhanced	Insured	Watch List
<b>General Obligation</b>			Aa1/VMIG		N	
General Obligation			1			
<b>Port Revenue Parity lien</b>	31 JAN 1990	145.21	Aa3		N	
Port Revenue Parity lien	2 JUN 1992	168.39	Aa3		N	
Port Revenue Parity lien	2 FEB 1993	82.41	Aa3	Aaa	N	
Port Revenue Parity lien	4 FEB 1994	128.89	Aa3		N	
<b>Port of Seattle General Obligation Limited Tax</b>	9 MAR 1994	154.69	Aa1		N	
Port Revenue Parity lien	2 APR 1996	106.34	Aa3	Aaa	N	
Port Revenue Parity lien	1 MAY 1997	140.36	Aa3	Aaa	N	
Port Revenue Parity lien	6 MAY 1998	73.18	Aa3	Aaa	N	
Port Revenue Subordinate lien	6 MAY 1998	27.93		Aaa	N	

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1	<b>Passenger Facility Charge Revenue Bonds, Series 1998A &amp; B</b>	16 JUL 1998 262.50	A2	Aaa	Y	9/27/2001 5:10:00 PM Possible Downgrade
2						
3						
4	<b>Special Facility Revenue Bonds, Series 1999 A, B &amp; C</b>	21 OCT 1999 217.43	Baa1	Aaa	N	
5						
6						
7	<b>Limited Tax General Obligation Bonds, Series 2000A &amp; 2000B</b>	3 APR 2000 117.15	Aa1		N	
8						
9						
10						
11						
12	<b>Revenue Bonds and Revenue Refunding Bonds, Series 2000</b>	10 AUG 2000 391.87	Aa2	Aaa	N	
13						
14						
15						
16	<b>Revenue Bonds, Series 2001A, B, C and D</b>	12 SEP 2001 542.00	Aa2		N	
17						

18 [http://www.moodys.com/moodys/cust/qcksearch/qckSearch\\_search\\_result.asp?n\\_id=800031266](http://www.moodys.com/moodys/cust/qcksearch/qckSearch_search_result.asp?n_id=800031266)  
19 [http://www.moodys.com/moodys/cust/qcksearch/qckSearch\\_search\\_result.asp?n\\_id=800031266&searchQuery=Port+of+Seattle%2C+WA&search=1&searchresult=named&searchIdent=qcksear](http://www.moodys.com/moodys/cust/qcksearch/qckSearch_search_result.asp?n_id=800031266&searchQuery=Port+of+Seattle%2C+WA&search=1&searchresult=named&searchIdent=qcksear)

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**EXHIBIT K**

**AIRPORTS -Current Issue- 10/2/2001**

**Airport Group Presses Congress For Financial Relief For Nation's Airports**

U.S. airports need immediate federal assistance to help counter an "impending crisis" as a result of recent hijacking events, the American Association of Airport Executives (AAAE) and Airports Council International (ACI) wrote members of Congress last week.

"Without immediate attention to address financial and insurance-related issues, many airports will soon be forced to significantly alter or cut operations, a result that will have far-reaching negative implications for the travelling public, the communities airports serve, and the national economy," the Sept. 26 letter stated.

The "overwhelming costs" airports are facing from FAA's revamped security procedures should be defrayed by federal assistance in order to keep up with agency requirements of visible law enforcement, addition security staff and additional screening equipment. Smaller airports will feel the most strain in keeping up with the mandates, which could be further aggravated by receding concession revenues, passenger loads, parking and landing fees. "We feel strongly that direct federal assistance is the best option given that airport security is a national security issue," AAAE and ACI said.

The groups called for temporary flexibility in using the airport improvement program of passenger facility charges to offset security expenses; allowing airports with a \$3 PFC rate to quickly increase it to \$4.50; a federal guarantee of airport bonds; standby lines of credit; providing three to six months of debt service to compensate in traffic declines; and giving greater flexibility for airports to refinance existing debt.

**AIRPORTS COUNCIL INTERNATIONAL –NORTH AMERICA CALLS ON CONGRESS TO FOCUS ATTENTION ON AIRPORTS**

**Funding for Increased Security Measures, A Reinforced Confidence in Bond Markets, and Assistance in Retaining War Risk Insurance, Are Among the Needs Sought for Airports**

Washington, D.C. (September 25, 2001) – On behalf of the Airports Council International – North America and the America Association for Airport Executives (AAAE), today ACI-NA President David Z. Plavin called on Congress to provided much needed assistance to airports whose operations are endangered as a result of the terrorist attacks. During his testimony before the U.S. House Transportation Aviation Subcommittee, Plavin emphasized two major areas for consideration – financial relief for airports and additional measures in the screening of passengers.

First, in order for airports to sustain the highest level of security and safety, while at the same time, ensuring the efficient movement of goods and people so vital to the economy, Plavin

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1 called for immediate relief from the federal government to help pay for the additional security  
2 measures that airports have implemented and to offset the reduction in passengers and revenue.  
3 "In working with the Federal Aviation Administration and the airlines, our airports have done a  
4 terrific job in implementing the new federally-mandated security requirements and in assisting  
5 the traveling public in dealing with the new constraints on the aviation system," Plavin said.  
6 "While airports are spending millions of dollars to increase security, passengers and revenues are  
7 declining, so it is critical that Congress and the Administration now focus attention on airports –  
8 whose problems and fate are inextricably tied with the airlines," he added. Airports believe the  
9 total costs and revenue foregone will reach an estimated \$3 billion by next year. ACI-NA and  
10 AAAE believe that since these costs were incurred because of the terrorist attacks assistance  
11 should come from the general funds in the Treasury. Other options noted include the institution  
12 of a security fee on ticketed passengers, and the temporary use of passenger facility charges  
13 (PFC) and Airport Improvement Program (AIP) funding to pay for increased security  
14 requirements.

15 This decline in passengers and revenues has further created instability in the airport bond  
16 market as noted in Standard and Poor's announcement last week that all of its North American  
17 airports are on "credit watch." Therefore, in addition to increased costs associated with new  
18 security measures, airports are also facing serious challenges in meeting their debt service  
19 requirements. To help airports meet their obligations, Plavin asked Congress to protect their  
20 stability by permitting airports to refinance all tax exempt debt service, and to provide three to  
21 six months of debt service to compensate for the halt and consequent declines in traffic. In  
22 addition, as airports are concerned that liability underwriters have elected to cancel war-risk  
23 insurance policies, ACI-NA and AAAE urged Congress to work with the airport community to  
24 provide airports with the same protection that airlines received in their recent relief package.  
25 "While insurance companies have raised the price of war risk insurance for airlines, they are  
canceling it for airports so that it is not available at any costs," said Plavin. "With such a high  
amount of fixed costs associated with airports, there are some airports that won't be able to  
operate without it, and may be forced to shut down critical operations unless they receive the  
necessary relief," he added.

In addition to providing necessary financial considerations, Plavin also asked Congress to  
consider other ways to improve aviation security. First and foremost, Plavin emphasized the  
need to use well-trained security professionals to screen passengers and baggage. "The key issue,  
in our view, is to improve the hiring, training, testing and thereby proficiency of those individuals  
conducting the screening of passengers and baggage. While many in Congress and the industry  
have called for federalization of screeners and potentially other employees in security functions,  
the most immediate need is to professionalize the workers in aviation security," said Plavin. "If  
Congress chooses to federalize the screening process, it is imperative that the agency or entity  
responsible be given the resources and equipment it needs on a continuing, long-term basis," he  
added. Other ways to improve security at airports include accelerating the deployment of  
explosive detection systems at more airports, providing new funding for more law enforcement

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officials and K-9 units, disseminating intelligence to designated airport security managers, and  
1 deploying additional federal security managers at more airports.

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**EXHIBIT L**

**A Third Runway at Sea-Tac is not Needed, Causes Harm  
and Does Not Solve Regional Problems**

The need for a third runway, the harm caused by a third runway, and its regional impacts are discussed below in the following categories:

1. **A Third Runway is Not Needed**
2. **Better Alternatives Are Available**
3. **A Third Runway is Inefficient**
4. **Significant Safety Problems Exist**
5. **Regional Impacts of a Third Runway are Severe**
6. **There are Major Environmental Problems**

**1. A Third Runway is Not Needed**

Sea-Tac operated successfully last year, with 446,066 total aircraft operations in the year 2000. Delays at Sea-Tac in 2000 were low, according to FAA. The FAA benchmark report data showed that only 1% of the aircraft were delayed significantly with the existing airfield layout. The FAA data also showed that Sea-Tac ranked 20<sup>th</sup> in the nation in terms of delay. Sea-Tac delays were on average less than one third of the delays at the other top 20 airports. At Sea-Tac, for each aircraft in 2000 that had a significant delay (more than of 15 minutes), there were 99 aircraft that did not have a significant delay. The most delayed airport in the nation (La Guardia) had delays 15 times worse than Sea-Tac.

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1 The Port's analysis shows that delays at Sea-Tac in 2005 and beyond will be no greater than  
2 those that occurred in 2000, without a third runway. The Port of Seattle prepared a "Do-Nothing  
3 Forecast" in the 1997 Supplemental EIS. Table D-1 in Appendix D of the Supplemental EIS  
4 provides a forecast of annual aircraft operations in a "Do-Nothing" situation with the existing  
5 airfield. This forecast shows that without a new third runway, the forecast number of aircraft  
6 operations would be constrained to 460,000 operations per year in 2005, 2010, and 2020. (The  
7 forecast increase in number of passengers would be accommodated on larger aircraft and with  
8 higher load factors, according to the Port.)

9 This ultimate forecast traffic level of 460,000 annual aircraft operations is only 3% greater than  
10 the 446,066 annual operations reported by the Port in their aviation statistics report as being  
11 achieved at Sea-Tac in 2000 with the low delays measured by FAA. (The Port forecasts that the  
12 same number of passengers would be carried on more and smaller aircraft if a third runway were  
13 built, with 474,000 aircraft using Sea-Tac in 2010 with a third runway.)

14  
15 The FAA benchmark report showed that FAA technology and procedural enhancements at Sea-  
16 Tac will provide capacity increases of 5% in both good and poor weather conditions.

17  
18 Therefore, the 3% increase in aircraft operations from 446,066 in 2000 to 460,000 in 2020 and  
19 beyond forecast by the Port will be more than offset by the 5% runway capacity increase forecast  
20 by FAA. Delays at Sea-Tac in future years will be no greater than those that already occurred in  
21 2000, even without a third runway. Delays to aircraft will still be low, affect a small percentage  
22 of the aircraft, and keep Sea-Tac as a low delay airport in the national rankings.

23 In short, a third runway is not needed, even by 2020, according to Port data.

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**AR 000132**

1 This conclusion applies with the Port's forecast increase in air traffic. However, recent data  
2 show that air traffic levels at Sea-Tac have started to fall in 2001. For the summer of 2001, the  
3 number of aircraft using Sea-Tac was approximately 5% less than for the summer of 2000.  
4 (Source: Port aircraft activity reports). Passengers continued to be accommodated by increasing  
5 the number of passengers per aircraft, 10% more in August 2001 (the latest month with data).  
6 Since the events of September 11, traffic has dropped by another 20%.

7  
8 One of the major airlines at SeaTac stated in a letter to Port officials "future passenger and  
9 operations growth are currently significantly below the level necessary to justify a new runway  
10 for the foreseeable future." Airlines are worried that ticket prices will go up to meet runway  
11 costs, and that less people will be able to fly as a result. At some airports around the country,  
12 airlines have pulled out when costs get too high, and this is not desirable for the Puget Sound  
13 region. This information on the decline in traffic at Sea-Tac removes any urgency to take ill-  
14 considered action to construct a third runway, when many better alternatives are available. It  
15 provides the opportunity for the region to undertake additional airport planning studies and select  
16 a better plan for the region.

## 17 **2. Better Alternatives Are Available**

18 A variety of better alternatives are available in lieu of the proposed third runway. These  
19 alternatives include use of larger aircraft, use of other regional airports, and technology-based  
20 capacity increases.

21 **Use of larger aircraft** and higher load factors are naturally occurring phenomena already under  
22 way at Sea-Tac. Airlines and other aircraft operators make sound business decisions to use larger  
23 aircraft and thereby reduce the number of aircraft operations, to reschedule flights outside of the

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1 peak periods, and/or to use other regional airports with less congestion. In the DSEIS for the third  
2 runway, the FAA and the Port concluded that these types of demand management actions would  
3 occur naturally in response to changes in the level of service and would enable the Airport to  
4 accommodate all of the passenger demand without the construction of an additional runway  
5 (DSEIS, page 2-7). The FAA analyzed the impact of demand management (Seattle-Tacoma  
6 International Airport Capacity Enhancement Plan Update Data Package 11, page 46-48), and  
7 demonstrated that a reduction in peak traffic of 3 percent would save approximately 23 percent of  
8 delays to aircraft.

9 **Use of other regional airports** (including existing facilities such as Boeing Field, Paine Field,  
10 and McChord AFB) is a feasible option that is available in the event that additional regional  
11 runway capacity is needed. According to the Seattle Times (July 17, 2001) Port of Seattle  
12 officials acknowledge that an additional airport will one day be necessary, and this view is shared  
13 by the Puget Sound Regional Council (PSRC).

14  
15 The PSRC Airport System Component of the 2001 Metropolitan Transportation Plan (Draft  
16 10/19/2000) shows regional airports on Exhibit 4-23. According to this Plan (Page 5-67), in  
17 addition to Sea-Tac, there are five smaller airports with commercial passenger service (including  
18 Boeing Field which has scheduled passenger service). The runway length at Boeing Field is  
19 approximately 10,000 feet. Other long runways at airports in the region include Paine Field  
20 (approximately 9,000 feet), and McChord AFB (approximately 10,000 feet). Gray Army Airfield  
21 at Fort Lewis and Bremerton National Airport each have runways with a length of length 6,000  
22 feet or more (Plan page 4-15).

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**AR 000134**

1 The PSRC Airport System Component of the 2001 Metropolitan Transportation Plan (Draft  
2 10/19/2000) shows passenger forecasts on Page 5-68, and aircraft operations forecasts and  
3 capacity estimates on Exhibits 6-1 and 6-3. The forecasts showed for example that Paine Field is  
4 expected to have 59,000 aircraft per year excess runway capacity in 2015. Similar excess  
5 capacity is available at other regional airports. This excess capacity is likely to be even larger  
6 after the events of September 11.

7 In summary, if in the future demand exceeds capacity at Sea-Tac, excess capacity is available and  
8 additional demand may be accommodated at other existing or new regional airports.

9  
10 **Technology-based capacity increases** are also available to increase Sea-Tac capacity.

11 The use of Localizer Directional Aid (LDA) Simultaneous Offset Instrument Approaches  
12 (SOIA) approaches in conjunction with an Instrument Landing System (ILS) approach on  
13 adjacent closely spaced runways allows an additional arrival stream in weather minimums lower  
14 than those required for visual approaches. This procedure has been in use for several years at St.  
15 Louis Lambert Field and more recently at San Francisco International Airport. St. Louis has  
16 experienced a capacity gain of about 18 arrivals per hour. At the St. Louis airport, the poor  
17 weather minima required for such approaches have been set as low as 1,200-feet and 4 miles  
18 visibility. As a result, full implementation of LDA/SOIA approaches would allow Sea-Tac to  
19 operate successfully over a wide range of weather conditions with low delays.

20 FAA recognized the benefit of these LDA/SOIA approaches at Sea-Tac in its June 19 2001 letter  
21 to the US Army Corps of Engineers, stating that they "would enhance efficiency at STIA during  
22 VFR2 conditions (below 5,000 feet ceiling and/or 5 miles visibility but above 1,000 feet ceiling  
23 and 3 miles visibility). In the FAA ANM-610 internal memorandum dated March 29, 2001,

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**AR 000135**

1 FAA also noted that "The technology suggested by Mr. Gosling that could have significant  
2 benefit is Precision Runway Monitor (PRM) with Simultaneous Offset Instrument Approach  
3 (SOIA) procedures." The exact approach minimums and resulting percentages of the year that  
4 the LDA/SOIA approaches would be used would result from progressive implementation and  
5 testing; and as at St. Louis, the minimums would approach VFR minimums after practical  
6 operating experience is obtained.

7 Additional new technologies offer additional runway capacity benefits; including the use of  
8 Global Positioning System (GPS), Precision Radar Monitoring (PRM), Traffic Alert and  
9 Collision Avoidance System (TCAS) and Flight Management System (FMS) equipment and  
10 procedures to facilitate multiple approaches in poor weather conditions. The FAA Office of  
11 System Capacity and Requirements ( in several publications, including the Aviation System  
12 Capacity Annual Report, Aviation Capacity Enhancement Plan, and Capacity Initiatives,) has  
13 identified Flight Management System, Global Positioning System, Precision Runway Monitor,  
14 and Traffic Alert and Collision Avoidance System technologies that are expected to permit  
15 increased arrival capacity for parallel runways by the year 2005.

16 FMS-flight path navigation procedures are expected to allow a reduction in weather minimums  
17 and offer alternative arrival paths for FMS-equipped aircraft. A conservative perspective on the  
18 results which could be achieved from the technologies listed above is that dual approaches might  
19 be made to Runways 16L and 16R, or 34L and 34R in some weather conditions in the relatively  
20 near future.

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**AR 000136**



1 The FAA benchmark report noted that immediately available technologies would increase Sea-  
2 Tac capacity by 5% (more than the Port's forecast traffic increase), and that additional capacity  
3 gains may be available in th future as the technologies mature.

4  
5 **3. A Third Runway is Inefficient**

6 Additional taxi distance and runway crossings cause a third runway to be inefficient. Each  
7 aircraft using a third runway would have to taxi an additional 2,500 feet and cross the two  
8 existing active runways when taxiing to or from the passenger terminal building. This can be  
9 expected to add 5 or more minutes of delay to each aircraft using a third runway, offsetting any  
10 reduction in runway delay that may occur.

11 **Significant airspace interactions with Boeing Field** will adversely impact the efficiency of a  
12 third runway and cause equivalent losses of capacity at Boeing Field.

13  
14 As noted in the PSRC Airport System Component of the 2001 Metropolitan Transportation Plan  
15 (Draft 10/19/2000), the operation of Boeing Field is limited today by airspace interactions with  
16 Sea-Tac (Page 7-5). Boeing Field is located approximately three miles north of Sea-Tac, with a  
17 runway that is at an angle of approximately 30 degrees to the Sea-Tac runways, causing Boeing  
18 Field and Sea-Tac operations to interact.

19 Adding an additional runway at Sea-Tac, pointed directly at Boeing Field only 4 miles away, is  
20 bound to exacerbate this interaction. These airspace interactions were highlighted in an FAA  
21 sponsored report (Aviation Simulations Int'l, Inc., Impact of Boeing Field Interactions on the  
22 Benefits of a Proposed New Runway at Seattle-Tacoma International Airport, July 1992). which  
23 states on Page 5 that *"The airport will not adequately accommodate 2015 traffic during north*

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1 *flow IMC conditions due to interaction of SEA departures with BFI operations, even with the*  
2 *new runway in place”.*

3  
4 The benefit of the third runway is reduced on an aircraft-for-aircraft basis because each aircraft  
5 operation at Boeing Field will eliminate an arrival to the third runway at Sea-Tac. According to  
6 the Port, *“The FAA’s 1995 Capacity Enhancement Study Update examined the impacts*  
7 *associated with interaction between Sea-Tac and Boeing Field (BFI). The interaction with*  
8 *Boeing Field was reflected in the analysis, as arrivals to Boeing’s Runway 13 would require a*  
9 *gap in the arrival stream to the proposed new runway at Sea-Tac during south flow operations.”*  
(Port response 6 to February 16, 2001 ACC/PACI comment letter.)

10  
11 The Port also believes that Boeing Field operations can be compromised as necessary to operate  
12 a third runway at Sea-Tac. According to the Port, *“It should also be acknowledged that, like*  
13 *most reliever airport operations in the United States, air traffic control procedures have evolved*  
14 *to minimize operational impacts of the primary commercial airport, such as Sea-Tac. In many*  
15 *cases, procedures are established so that the reliever airport (Boeing Field) is subservient to the*  
16 *primary airport.”* (Port response #6 to February 16, 2001 ACC/PACI comment letter.)

17  
18 In essence, the airspace interactions between Boeing Field and Sea-Tac mean that any gains in  
19 capacity at Sea-Tac are obtained at the cost of a similar reduction in capacity at Boeing Field. It  
20 is not in the public interest to build a third runway at Sea-Tac and cause environmental harm,  
21 while concurrently compromising the value of an existing public asset at Boeing Field that is an  
22 important part of the regional aviation system.

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**AR 000138**

1                   **Insufficient spacing of a third runway from Runway 16R-34L will compromise the**  
2 operating efficiency of both runways. The minimum spacing between these runways needed for  
3 independent operations is 2,500 feet. The planned spacing between these runways is 1,700 feet.  
4 As a result, aircraft instrument operations on a third runway would be dependent on all  
5 operations on Runway 16R-34L. In addition, all instrument operations on Runway 16R-34L  
6 would be dependent on operations on both of the other two runways (a third runway and Runway  
7 16L-34R).

8  
9  
10 When it is also recognized that arrivals to a third runway are also dependent on arrivals to  
11 Runway 16L-34R, even though they are 2,500 feet separated, the series of multiple dependencies  
12 between the three runways will mean that the center runway (existing Runway 16R-34L) will  
13 become essentially unusable in instrument conditions.

14  
15 As a result, operation of a third runway disrupts the usefulness of the existing runway 16R-34L  
16 in such a way that much of any runway capacity gain with a third runway is offset by a  
17 corresponding loss in capacity of the exiting runways.

18  
19 **4. Significant Safety Issues Exist**

20 **Aircraft taxiing safety will be compromised with a third runway.** Currently, approximately  
21 40% to 50% of aircraft using Sea-Tac must taxi across an active runway between the runway and  
22 the terminal building.

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**AR 000139**

1 Aircraft crossing active runways without permission or as a result of a controller error are  
2 referred to as runway incursions. Runway incursions are a serious safety hazard that is being  
3 addressed as an urgent matter by FAA. A runway incursion, that caused a near-collision,  
4 occurred at Sea-Tac on January 21, 2001.

5 A third runway would increase the risk of runway incursions for aircraft using Sea-Tac, as any  
6 aircraft taxiing to and from the new runway would have to cross the two existing active runways  
7 -- Runways 16L-34R and 16R-34L. Depending on the use of the new runway, the number of  
8 aircraft crossing active runways could increase by 50% to 100%. The runway incursion rate and  
9 collision risk would increase by at least this percentage as the new taxiway system is more  
10 complex, and there would be more scope for disorientation and/or errors by pilots and  
11 controllers.

12  
13 Constructing a third runway and increasing the risk of runway incursions and aircraft collisions  
14 by a factor of up to two times existing rates is not in the public interest, particularly when there  
15 are many other alternatives available with lower cost and less adverse environmental impact.

16  
17 Port assertions that runway incursions should not influence airfield layout ("It is not clear that the  
18 problem will be worse with an additional runway, as the operations will be handled in  
19 accordance to safe air traffic practices." - according to the Port's response to the Geoffrey  
20 Gosling February 16 letter) are clearly wrong in light of the new FAA runway incursion study.

21 The Port's assertion that runway incursions are not relevant are belied by FAA concerns (1)  
22 expressed by the FAA administrator "I am concerned about the number of runway incursions has  
23 been increasing... We must reduce that rate." and (2) expressed in the FAA Aviation News

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**AR 000140**

1 (February 2000 issue on runway incursion safety issues) "Runway incursions are a people  
2 problem. Whether an air traffic controller makes a mistake and puts two aircraft on the same  
3 runway, or an airline or general aviation pilot lands on the wrong runway or taxis onto a runway  
4 without permission... people are involved in and cause this problem, and until people stop  
5 making these kinds of mistakes, we are going to have runway incursion problems."

6 **Aircraft airspace operational safety will be compromised** due to multiple airspace interactions  
7 with Boeing Field, which is only some four miles from Sea-Tac. Aircraft using a third runway at  
8 Sea-Tac in poor weather conditions would conflict with aircraft using Boeing Field, thereby  
9 reducing the value of a third runway at Sea-Tac. In a similar manner to the situation described for  
10 taxiing safety, the addition of one more arrival or departure stream into the airspace increases the  
11 complexity of the airspace and increases the number of potential conflicts with Boeing Field  
12 traffic significantly. A Boeing Field operation would have to be threaded between two south  
13 flow dependent arrival streams or two north flow departure streams from Sea-Tac. These  
14 additional conflicts directly result in losses in efficiency and increases in controller workload,  
15 and can contribute to safety problems and potential controller operational errors.

16 **Aircraft safety may be compromised by walls near the proposed third runway**, due to the  
17 high walls and embankment surrounding the new runway. There would be a near vertical drop of  
18 approximately 170 feet on the west side of the proposed new runway, that would start less than  
19 100 feet from the edge of the Runway Safety Area (RSA).

20  
21 There is an additional near-vertical wall proposed for construction to the immediate north of the  
22 north threshold of the proposed third runway. This wall is approximately 75 feet high, and  
23 results in a 75 foot drop from the end of the extended runway safety area to Miller Creek.

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**AR 000141**

1 Aircraft over-running the RSA during landings to the North would fall 75 feet into Miller Creek  
2 and/or Lora Lake. Aircraft landing to the South that undershoot by more than 60 feet below the  
3 glide slope would crash into this near vertical wall.

4 Accident site distribution data collected by ALPA (Airport Engineering, Ashford N. 1992, Figure  
5 9.1) show that aircraft accident sites are often outside the boundary of the RSA, including  
6 undershoots and veering off the runway. Accident sites such as those identified by ALPA, if they  
7 occurred on a third runway, could cause aircraft to hit vertical walls and/or drop 170 feet into  
8 Miller Creek. According to Ashford "the main causes of these accidents are wind shear and pilot  
9 judgement." Ashford recommends that extended length and width runway safety areas be  
10 provided to overcome these concerns. No such provision has been made for the proposed third  
11 runway.

12 Wind shear hazard potential remains unexamined. According to the Port, no FAA wind shear  
13 criteria are available for the retaining walls, their geometry and their proximity to the proposed  
14 Third Runway. Therefore Port design compliance with FAA criteria does not in any way  
15 guarantee aircraft safety with respect to wind shear.

16  
17 FAA recognizes the safety concerns associated with wind shear. The FAA Air Traffic Control  
18 Manual, FAA Order 7110.65M, Section 5-9-6 c. states that "*Consideration should be given to  
19 known factors that may in any way affect the safety of the instrument approach phase of flight,  
20 such as surface wind direction and velocity, wind shear alerts/reports severe weather activity,  
21 etc. Closely monitor weather activity that could impact the final approach course. Weather  
22 conditions in the vicinity of the final approach course may dictate a change of approach in use.*"

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**AR 000142**

1 The Port states that the Port runway design contractor contacted bridge design specialists to  
2 consider wind effects, "*because no such specialists beyond that of the FAA exist concerning*  
3 *runway design requirements*". No details of these contacts were provided, and no evidence was  
4 provided that any wind shear safety assessment has been conducted. Indications from  
5 undocumented contacts by the Port runway design contractor with bridge design specialists are  
6 not an adequate response to a potentially significant safety issue. The Port conclusion that "*no*  
7 *unusual wind conditions are expected*" is clearly premature. A full safety assessment is required  
8 before any conclusions can be drawn.

9 Bridge design specialists have no special knowledge concerning aircraft safety and susceptibility  
10 to wind shear on approach to runways. Their special knowledge relates to the design of bridges  
11 only. The bridge design specialists indicated that "*the proposed embankment and wall design do*  
12 *not represent unusual wind concerns that do not already exist at Sea-Tac Airport off the*  
13 *immediate ends of the runway due to the terrain differences particularly on the north end of the*  
14 *airfield*". This statement only suggests that bridge design specialists believe that unusual wind  
15 concerns may already exist at Sea-Tac off the immediate ends of the runways. Whether or not  
16 the bridge design specialists are correct that there are currently unusual wind concerns at Sea-Tac  
17 Airport today; building near-vertical walls, with drops of 60' to 170', off the end and sides of a  
18 runway clearly raises wind shear safety concerns that must be fully addressed by experts other  
19 than bridge designers before concluding that there is no safety problem. Aerodynamicists,  
20 meteorologists, pilots (perhaps including pilots with aircraft carrier experience) and other experts  
21 must first address this issue.

22 As a result, reliance on walls as high as 170 feet to support the third runway without thorough  
23 analysis of potential aircraft safety problems is not in the public interest because they may  
24 compromise aircraft safety.

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AR 000143

1  
2 **5. Regional Impacts of a Third Runway are Severe.**

3 A third runway at Sea-Tac has severe regional impacts, including the use of scarce regional  
4 resources, maintenance of high airport ground access costs, high air ticket prices, and failure to  
5 provide a long-term regional solution.

6  
7 **Use of scarce regional resources** may foreclose multiple commercial airport solutions that are in  
8 the public interest. Multiple regional commercial airport solutions that are in the public interest  
9 may be foreclosed if the Port of Seattle proposed runway and associated airport development  
10 were constructed. Regional financing capability for airport improvements would be significantly  
11 degraded by the expenditure of in excess of \$3 billion by the Port on the third runway and other  
12 Sea-Tac construction. The financing that would be committed to the third runway and other Sea-  
13 Tac improvements is likely to foreclose public tolerance and ability to pay for the expenditures  
14 needed to develop a truly regional airport system.

15  
16 **High airport ground access trip costs** to Sea-Tac will be maintained as the trips originate  
17 across the region and must traverse the congested freeway system adjacent to Sea-Tac to get to  
18 the airport. A multiple airport system (like those existing in many other large communities such  
19 as Dallas or Houston) would reduce overall airport ground access travel , and thereby save  
20 passenger time, highway congestion, and regional air pollution.

21 **High air ticket prices** will be reinforced by the additional costs airlines must bear to pay for a  
22 third runway and other improvements at Sea-Tac. Many studies confirm that airline ticket and  
23 airport parking prices are lower in communities where there is a choice of airports. The public is

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1 best served by the availability of alternatives and competition for services. Concentration of all  
2 commercial aviation activity in one location with one provider, precludes this competition and is  
3 not in the public interest, particularly when there are many other alternatives available with lower  
4 cost and less adverse environmental impact.

5 Regional alternatives were dismissed in early studies because they were misinformed about Sea-  
6 Tac third runway project costs, benefits, and impacts. When the Flight Plan project was  
7 examining regional alternatives, it was believed that to expand Sea-Tac, "*Total potential*  
8 *investment, including necessary land acquisition for buffers, is estimated to be less than \$400*  
9 *million*" (Flight Plan Final Report, Page 89). For a variety of reasons, these costs and impacts  
10 have escalated significantly, and if current data were available at the time of the Flight Plan  
11 project on the true costs and impacts of Sea-Tac expansion, it seems likely that other alternatives  
12 would have been demonstrated to be superior.

13 **Failure to provide a long-term regional solution** is a major flaw of a third runway. Both  
14 PSRC and the Port recognize the need for a second regional commercial service airport over the  
15 longer term. With a second airport in place, there would be no conceivable justification for a  
16 third runway at Sea-Tac. The lack of current need for a third runway has been documented. The  
17 opportunity now exists to revisit regional planning studies and select a good air service  
18 alternative for the whole region.

19  
20  
21 **6. Major environmental problems have been documented elsewhere, and are not repeated**  
22 here. The problems include wetland fill and disruption, aircraft noise, stormwater and  
23 groundwater management problems, air and water pollution, harm to endangered species, and  
24 construction disruption.

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**Conclusions**

A third air carrier runway at Sea-Tac is not the best solution to the Puget Sound region's airport capacity needs, and is harmful to the development of a good long-term regional solution.

Obvious alternatives exist to the Port's proposed third runway with lower costs and which avoid or reduce adverse impacts while providing high quality aviation service to the region.

The latest Port and FAA data show that delays at Sea-Tac in future years will be no greater than those that occurred in 2000, even without a third runway, and therefore that there is no justification for the cost and impacts associated with construction of a third runway.

The 5% drop in air traffic prior to September 11, and the 20% additional drop in air traffic since September 11 provide further evidence of the lack of need and justification for a third runway.

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EXHIBIT M

DROP IN SEA-TAC AIRCRAFT OPERATIONS THROUGH AUGUST 2001

	<u>2001</u>	<u>2000</u>	<u>Change</u>	<u>% Change</u>
<b>PASSENGERS PER</b>				
<b>MONTH</b>				
January	1,919,796	1,879,324	40,472	2.15
February	1,850,909	1,936,115	-85,206	-4.4
March	2,260,785	2,270,762	-9,977	-0.44
April	2,264,747	2,238,187	26,560	1.19
May	2,396,425	2,411,900	-15,475	-0.64
June	2,728,936	2,717,022	11,914	0.44
July	3,017,936	2,947,491	70,445	2.39
August	3,121,955	2,992,343	129,612	4.33

**AIRCRAFT OPERATIONS PER MONTH**

January	35,595	34,364	1,231	3.58
February	31,650	33,310	-1,660	-4.98
March	35,413	36,555	-1,142	-3.12
April	34,225	35,904	-1,679	-4.68
May	36,275	37,981	-1,706	-4.49
June	36,729	38,800	-2,071	-5.34
July	39,094	41,178	-2,084	-5.06
August	39,568	41,658	-2,090	-5.02

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**PASSENGERS PER AIRCRAFT**

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January	53.9	54.7	-0.8	-1.4
February	58.5	58.1	0.4	0.6
March	63.8	62.1	1.7	2.8
April	66.2	62.3	3.8	6.2
May	66.1	63.5	2.6	4.0
June	74.3	70.0	4.3	6.1
July	77.2	71.6	5.6	7.8
August	78.9	71.8	7.1	9.8

10 Source: Port of Seattle Aviation Activity Report

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**AR 000148**

AR 000149

EXHIBIT



1           1.       We are members of the Washington State Legislature. Among us, we have the  
2 following committee responsibilities in the Legislature:

3                   a.       Senator Julia Patterson, 33rd District: Chair, State and Local Government  
4 Committee; Environment, Energy & Water Committee; Labor, Commerce and Financial  
5 Institutions Committee; Transportation Committee.  
6

7                   b.       Senator Dow Constantine, 34th District: Vice Chair, Ways & Means  
8 Committee; Vice Chair, Judiciary Committee; Natural Resources, Parks & Shorelines  
9 Committee; Rules Committee.

10                   c.       Senator Tracey Eide, 30th District: Vice Chair, Education Committee;  
11 Vice Chair, Environment, Energy & Water Committee; Transportation Committee; Rules  
12 Committee.  
13

14                   d.       Representative Shay Schual-Berke, 33rd District: Vice Chair, Healthcare  
15 Committee; Appropriations Committee; Education Committee.

16                   e.       Representative Karen Keiser, 33rd District: Democratic Policy Chair;  
17 Appropriations Committee; Education Committee; Financial Institutions & Insurance  
18 Committee.  
19

20                   f.       Representative Joe McDermott, 34th District: Education Committee;  
21 Judiciary Committee; State Government Committee.

22                   g.       Representative Erik Poulsen, 34th District: Co-Chair, Technology,  
23 Telecommunications & Energy Committee; Capital Budget Committee; Rules Committee.  
24

25 DECLARATION OF PATTERSON,  
CONSTANTINE, EIDE, SCHUAL-BERKE,  
KEISER, MCDERMOTT, POULSEN,  
MILOSCIA, AND MITCHELL

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2421 West Mission Avenue

1           h.       Representative Mark Miloscia, 30th District: Vice Chair, State  
2 Government Committee; Children & Family Services Committee; Financial Institutions &  
3 Insurance Committee.

4           i.       Representative Maryann Mitchell, 30<sup>th</sup> District: Co-Chair, Transportation  
5 Committee.  
6

7           2.       As can be seen from the above list, our responsibilities are state-wide, including  
8 leadership positions for the Senate State and Local Government Committee, the Senate  
9 Environment, Energy & Water Committee, the Senate Judiciary Committee, the House  
10 Transportation Committee, and other committees with state-wide responsibilities and  
11 importance.  
12

13           3.       We understand that the Port of Seattle has submitted statements from various Port  
14 employees, from Alan Ralston (“Director of Northwest State and Local Government Relations for  
15 The Boeing Company”), and from the Director of Airports for the Port of Pasco, all in support of  
16 the argument that there is “an overriding public interest” which would justify denial by the  
17 Pollution Control Hearings Board of the request by the Cities of Burien, Des Moines, Federal Way,  
18 Normandy Park and Tukwila and the Highline School District for a stay of the Department of  
19 Ecology’s recent Section 401 Certification of the Sea-Tac Airport third runway project. We  
20 therefore submit this joint declaration to impress upon the Board that, while there are many  
21 different public interests at work here, the public interests identified by the Port’s proponents are by  
22 no means overriding, and, in some cases, simply do not exist.  
23

24 DECLARATION OF PATTERSON,  
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1           4.       Certainly, many of our constituents are opposed to construction of the third  
2 runway and the other projects proposed for Sea-Tac, and we sympathize with those views.  
3 However, that is not the key question of overriding public interest. Rather, the issue before the  
4 Board is whether a claimed need for haste in construction of the third runway can override what  
5 must be the paramount public interest in ensuring a fair, open and deliberate process in  
6 administration of our clean water laws. Our view as Legislators familiar with the competing  
7 public interests asserted by all parties, and vitally concerned about the functioning of our state  
8 government, is that there can be no overriding public interest in allowing the Ecology  
9 Certification to take effect before the Board has conducted a trial to determine whether Ecology  
10 made the right decision in the proper manner.  
11

12           5.       Prior to October, 2000, we had some confidence in the Department's ability to  
13 maintain the integrity and appearance of fairness in its processing of the Port's application.  
14 However, after Ecology removed its senior Clean Water Act expert, Tom Luster, from the  
15 process, we noted a serious decline in the Department's performance. Since then, we have  
16 become aware of more than one instance in which it appeared that Ecology was not addressing  
17 legitimate water quality issues in an appropriate fashion, but was instead succumbing to Port  
18 pressure for approval. Our concern in this regard was not enhanced when we learned recently  
19 that the Department of Ecology had issued a Certification to the Port on August 10, 2001, and  
20 then, based on Port complaints about it, agreed to revise it to the Port's satisfaction. This all  
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24 DECLARATION OF PATTERSON,  
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1 occurred out of the public eye and without notice to or involvement of the scientists  
2 commissioned by the local cities to comment to Ecology on Port proposals.

3           6. For all of these reasons, the overriding public interest here is one which militates  
4 strongly against denial of a stay, and strongly in favor of granting one so that the public as a  
5 whole can have confidence that the right environmental decision has been made, for the right  
6 reasons, in the appropriate manner.

7           7. We are also aware of statements made in declarations submitted to the Board by  
8 Gina Marie Lindsey, Michael Cheyne and Michael Feldman, all of the Port of Seattle, by former  
9 Seattle Port Commissioner and outgoing Seattle Mayor Paul Schell, and by Pasco Director of  
10 Airports James L. Morasch. These statements reflect striking tunnel vision with regard to the  
11 public interest, particularly in light of recent events. They continue the Port's longstanding  
12 theme that even a day's "delay" in moving ahead with construction of the third runway will cost  
13 thousands of dollars and untold harm to the regional air transportation system. Yet, it was  
14 commonly reported even before September 11 that air traffic at Sea-Tac was trending downward,  
15 not upward, contrary to the Port's earlier predictions.

16           8. Now, in the wake of September 11's tragic events, there is general agreement --  
17 except apparently by the Port -- that prior assumptions concerning air traffic and airport  
18 utilization are no longer reliable and do not reflect the new, post-September 11 realities. These  
19 realities include a drastic drop-off in air travel; severe financial instability in the airline industry;  
20 and placement of several airport operators, including the Port of Seattle, on the Moody's Investor  
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DECLARATION OF PATTERSON,  
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1 Service watch list for various airport revenue bonds tied to passenger facility charges (a financing  
2 mechanism which the Port proposes to use for substantial parts of its third runway and related  
3 projects). Many of these new realities have the potential to directly affect whether the third  
4 runway and other airport improvements will be needed, and whether they should be constructed  
5 in their current forms and locations.  
6

7 9. While confronting these questions, our constituents have been notified of layoffs  
8 by The Boeing Company which far exceed any seen in this region in a generation. At the same  
9 time, there have been drastic reductions in employment by the local airline industry. It therefore  
10 borders on ludicrous for the Port to claim an overriding public interest in proceeding with haste  
11 on its \$1 billion project. It is equally ludicrous for The Boeing Company to oppose a few  
12 months' stay in the Ecology 401 decision, agreeing with the Port's demand for haste, while at the  
13 same time it is rethinking its own business plan and shedding thousands of local employees.  
14

15 10. September 11's tragic events have also brought into focus a concern which was  
16 reported even earlier, that is, lax security arrangements at Sea-Tac Airport. This concern is  
17 particularly acute for our constituents, many of whom live in the surrounding community and  
18 could be on the front lines in the event of a tragic event in the airport environs. The concern  
19 extends not just to the use of high-turnover, minimum-wage security personnel at the airport, but  
20 to Sea-Tac's physical configuration without regard to security concerns (recent news reports have  
21 described stop-gap security measures by the Port, for example, closing entire sections of parking  
22 garages).  
23  
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25 DECLARATION OF PATTERSON,  
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1           11.     Recent reports also point to an alarming lack of security for runways themselves,  
2 with security currently being concentrated almost exclusively in passenger terminals. The  
3 addition of a third runway with a steep drop-off on one side and uninhabited areas below only  
4 adds more avenues for security breaches. There is no indication that any of these concerns were  
5 taken into account in planning for the third runway projects. In particular, the Port's plan calls  
6 for construction of the "Great Wall of Sea-Tac," a 160-foot high retaining wall extending  
7 approximately 1,500 feet to hold back some of the 20-plus million cubic yards of fill which  
8 would be imported onto the site. If the wall fails (due either to design flaws or deliberate attack),  
9 the third runway fails, and the creek and environs below will be lost. Further, to import fill and  
10 construct the wall, the Port plans to run large dump trucks literally continuously for a period of  
11 years onto the airport site, creating yet another avenue for potential security problems.

14           12.     While, in the end, the Port may decide to proceed with its plans (if the 401  
15 Certification passes legal muster and any Corps 404 permit does likewise), there is -- and should  
16 be -- no rush in doing so. This is a time for reexamination of how the air transportation industry  
17 does business. The Port is not exempt from this obvious public need for reexamination, nor  
18 should it be. There is no overriding public interest which would contradict the need for a stay to  
19 preserve the Board's ability to review and act effectively on the Ecology certification.

21 //  
22 //  
23 //

24 DECLARATION OF PATTERSON,  
25 CONSTANTINE, EIDE, SCHUAL-BERKE,  
KEISER, MCDERMOTT, POULSEN,  
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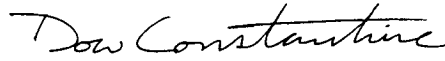
1 I declare under penalty of perjury under the laws of the State of Washington that the  
2 foregoing is true and correct.

3 DATED this 8th day of October, 2001, at King County, Washington.

4  
5 

6 Senator Julia Patterson

7  
8 DATED this 8th day of October, 2001, at King County, Washington.

9 

10 Senator Dow Constantine

11 DATED this 8th day of October, 2001, at King County, Washington.

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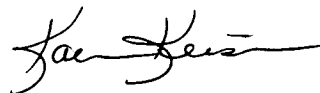
14 Senator Tracey Eide

15 DATED this 8th day of October, 2001, at King County, Washington.

16  
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18 Representative Shay Schual-Berke

19 DATED this 8th day of October, 2001, at King County, Washington.

20  
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22 Representative Karen Keiser

23  
24  
25 DECLARATION OF PATTERSON,  
CONSTANTINE, EIDE, SCHUAL-BERKE,  
KEISER, MCDERMOTT, POULSEN,  
MILOSCIA, AND MITCHELL

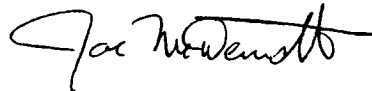
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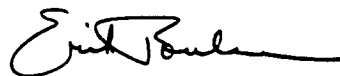
Spokane, WA 99201

1 DATED this 8th day of October, 2001, at King County, Washington.

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4 Representative Joe McDermott

5 DATED this 8th day of October, 2001, at King County, Washington.

6  
7 

8 Representative Erik Poulsen

9  
10 DATED this 8th day of October, 2001, at King County, Washington.

11  
12 

13 Representative Mark Miloscia

14 DATED this 8<sup>th</sup> day of October, 2001, at King County, Washington.

15  
16 Representative Maryann Mitchell

17  
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22  
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24  
25 DECLARATION OF PATTERSON,  
CONSTANTINE, EIDE, SCHUAL-BERKE,  
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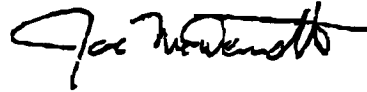
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DATED this 8th day of October, 2001, at King County, Washington.



Representative Joe McDermott

DATED this 8th day of October, 2001, at King County, Washington.



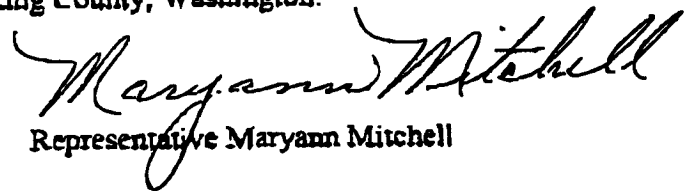
Representative Erik Poulsen

DATED this 8th day of October, 2001, at King County, Washington.



Representative Mark Miloscia

DATED this 8th day of October, 2001, at King County, Washington.



Representative Maryann Mitchell

DECLARATION OF PATTERSON,  
CONSTANTINE, EIDE, SCHUAL-BERKE  
KFSER, MCDERMOTT, POLLSSEN,  
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POLLUTION CONTROL HEARINGS BOARD  
FOR THE STATE OF WASHINGTON

AIRPORT COMMUNITIES COALITION,	)	
	)	PCHB No. 01-133
Appellant,	)	PCHB No. 01-160
	)	
v.	)	DECLARATION OF SALLY NELSON,
	)	MAYOR, CITY OF BURIEN
STATE OF WASHINGTON,	)	
DEPARTMENT OF ECOLOGY; and	)	(Department of Ecology Orders No.
THE PORT OF SEATTLE,	)	1996-4-02325; No. 1996-4-02325
	)	(Amended-1))
Respondents.	)	
_____	)	

Sally Nelson declares and states as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts stated herein.
2. I am the Mayor of the City of Burien, Washington. Burien is vitally interested in the Department of Ecology's Section 401 Certification for the Port of Seattle's airport projects. For example, over fifty percent of the Miller Creek drainage basin is within our city's boundaries. Burien devotes considerable resources to protection and enhancement of area streams and watersheds. The headwaters of Walker Creek, a tributary of Miller Creek which provides low summer flow for salmon habitat in Walker and Miller Creeks, are located within our city's boundaries.

DECLARATION OF SALLY NELSON - 1	HELSELL FETTERMAN LLP	Rachael Paschal Osborn
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	Seattle, WA 98101-2509	Spokane, WA 99201

1           3.       Because of our concern that the Ecology decision is not well-founded, Burien, as a  
2 member of the Airport Communities Coalition, is asking the Pollution Control Hearings Board to  
3 review the Department of Ecology's Clean Water Act Section 401 Certification that water quality  
4 standards will not be violated. It is my belief that Ecology's decision was driven by politics,  
5 rather than science, particularly after October, 2000, when Tom Luster, the Department's senior  
6 staff expert on Section 401 matters, was removed abruptly from the process. The Port's  
7 subsequent submittal of its (third) Section 401 application and its approval by Ecology despite  
8 numerous unanswered questions and yet-to-be-submitted analyses raise more questions in the  
9 public's mind than they resolve concerning whether there really is reasonable assurance that the  
10 Port project will not degrade water quality in our city.

11  
12  
13           4.       The citizens of Burien have long understood that under both the federal Clean  
14 Water Act and state law water quality is a paramount and overriding public interest. Confidence  
15 in public processes and resulting decisions on water quality is also a matter of overriding public  
16 interest. I understand that Port employees and Port supporters oppose a stay of the Ecology 401  
17 Certification to allow the Board a few months in which to review it. However, the "public  
18 interests" cited for opposing a stay are neither overriding nor even sensible in light of the current  
19 situation. For example, the Port states on the one hand that it will suffer hypothetical losses of a  
20 few thousand dollars per day if work does not proceed immediately, but on the other hand  
21 acknowledges that it would be proceeding at the risk of thousands of dollars in public funds  
22 because of the possibility that the 401 Certification would be overturned or that an Army Corps  
23  
24

25 DECLARATION OF SALLY NELSON - 2

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**AR 000162**

1 Section 404 permit would not be granted. As mayor of a municipality and a long-time  
2 participant in governmental affairs in the State of Washington, I can see no overriding public  
3 interest in permitting the Port to make such a gamble with public funds. There is, in fact, an  
4 overriding public interest in preventing such a gamble, particularly when the assets at stake are  
5 not just Port money, but the environmental quality enjoyed by the citizens of Burien.  
6

7 5. Similarly, claims by Port employees and The Boeing Company of an overriding  
8 need to move ahead before the Board has ruled based on purported air traffic demands ask the  
9 Board to ignore facts which have been apparent for some time. For example, it has been widely  
10 reported that the Port projections for increased air traffic demand at Sea-Tac have not been met  
11 over the past year, and that, in fact, over the past year traffic at Sea-Tac has decreased. These  
12 reports pre-dated the awful events of September 11, and their aftermath.  
13

14 6. We are now in a time of Boeing layoffs, airline layoffs, drastic decreases in air  
15 travel, new security concerns, and financial instability for both airlines and airport operators,  
16 including the Port of Seattle. To suggest now that there is an "overriding public interest" in  
17 proceeding with the billion-dollar third runway project in the next few months is absurd. If the  
18 Board were to accept this argument as a basis for denying ACC's request for a stay, it would not  
19 serve the real overriding public interests in this matter, which are environmental protection and  
20 restoration of public confidence in the 401 Certification process itself. The overriding public  
21 interest here lies in an impartial decision by a non-political quasi-judicial board such as the  
22 PCHB before the 401 Certification is permitted to take effect.  
23  
24

25 DECLARATION OF SALLY NELSON - 3

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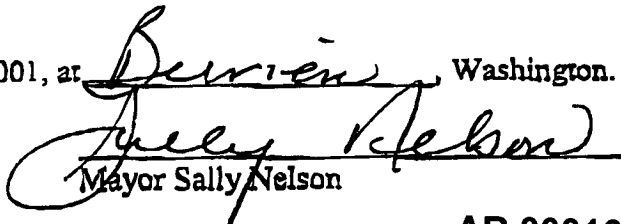
**AR 000163**

1           7.       The hazards associated with the "Great Wall of Sea-Tac," the 160-foot high,  
 2 1,500-foot-long wall proposed as part of the embankment system to hold back the more than 20  
 3 million cubic feet of fill the third runway would require, continue to be of major concern. ACC  
 4 scientists have always identified this wall, in a seismically unstable zone, as an environmental  
 5 accident waiting to happen. Recent events suggest it could be the focus of something worse.  
 6 There is no overriding public interest in commencing its construction -- or even preparing to  
 7 commence its construction -- until all of its implications have been assessed.

8           8.       The Board should also be aware that the absence of 401 Certification has not  
 9 precluded the Port from conducting airport construction activities. We in Burien are already  
 10 suffering from a ceaseless train of Port trucks importing fill to its site for a project which has not  
 11 gained and may never gain final approval in the first place. Therefore, it is simply not true that a  
 12 stay of the 401 Certification, based on the Port's past performance, will halt activities which the  
 13 Port is apparently undertaking at its own risk in furtherance of the project. A stay will, however,  
 14 prevent the floodgates from opening further and go far to reassure the public that environmental  
 15 decisions will not be based on Port fait accompli tactics, but on the merits.

16           I declare under penalty of perjury under the laws of the State of Washington that the  
 17 foregoing is true and correct.

18           DATED this 5 day of October, 2001, at Burien, Washington.

19   
 20 Mayor Sally Nelson

AR 000164

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**AR 000165**

POLLUTION CONTROL HEARINGS BOARD  
FOR THE STATE OF WASHINGTON

AIRPORT COMMUNITIES COALITION, ) No. 01-133  
) No. 01-160  
Appellant, )  
)  
v. ) DECLARATION OF ROBERT  
) OLANDER IN SUPPORT OF ACC'S  
) MOTION FOR STAY  
STATE OF WASHINGTON, )  
)  
DEPARTMENT OF ECOLOGY; and ) (Section 401 Certification No.  
THE PORT OF SEATTLE. ) 1996-4-02325 and CZMA concurrency  
) statement, issued August 10, 2001,  
Respondents. ) Reissued September 21, 2001, under No.  
) 1996-4-02325 (Amended-1))

Robert Olander declares as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts stated herein.

2. I am City Manager of the City of Des Moines and have served in that position since February of 1996. Prior to that I served as Assistant City Manager for the City of Des Moines from February of 1988. In those capacities I, I have followed and participated in proceedings of the Puget Sound Regional Council concerning airport planning. I served as a member of the Puget Sound Regional Council (PSRC) Advisory Committee charged with studying sites for a supplemental airport for the Puget Sound Region, I participated in PSRC meetings, read PSRC documents and reports on airport issues and testified before the PSRC on airport issues.

3. I have reviewed the Declarations of Gina Marie Lindsay and related submissions by the Port to the Board, as well as the Port's Memorandum Opposing ACC's Motion for Stay, concerning

DECLARATION OF ROBERT OLANDER IN  
SUPPORT OF ACC'S MOTION FOR STAY - 1

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**AR 000166**

1 the actions of the Puget Sound Regional Council on the Port of Seattle's proposed Third Runway.  
2 These statements appear to suggest that the Pollution Control Hearings Board's review of the Airport  
3 Communities Coalition request for a stay of Ecology's Clean Water Act section 401 certification  
4 should be denied because the PSRC has adopted a resolution for construction of the third Runway. I  
5 submit this statement to give the Board the context in which the PSRC resolution was adopted and,  
6 further, to point out to the Board that there is nothing in the resolution which addresses Clean Water  
7 Act concerns or suggests that they need not be reviewed thoroughly before the project proceeds.

9 4. From approximately 1992 through 1994 the PSRC undertook a process to review  
10 regional air capacity to determine if a major supplemental airport in the Puget Sound region was  
11 feasible and might serve as an alternative to construction of a third runway at Seattle-Tacoma  
12 International Airport (STIA). The PSRC hired a consulting firm and appointed a Technical Advisory  
13 Committee to undertake this study and to make recommendations to the full board of the PSRC. Under  
14 the terms of the authorizing resolutions, if the advisory committee found any sites that passed initial  
15 cost, feasibility, and environmental review, the PSRC would then proceed with more detailed  
16 feasibility studies on the finalist sites. PSRC Resolution A-93-03: Implementation Steps, states in  
17 Section I.C.2., "If sites exist, consultants continue with environmental, financial, legal and market  
18 feasibility studies."  
19  
20

21 5. However, the PSRC process to search for alternatives to a third runway at STIA was  
22 fundamentally flawed from the beginning and throughout the process. The advisory committee was  
23 restricted in writing from even considering Paine Field as an alternative site (*see* PSRC Resolution  
24

25 DECLARATION OF ROBERT OLANDER IN  
SUPPORT OF ACC'S MOTION FOR STAY - 2

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**AR 000167**

1 A-93-03, Item 6). Paine Field, with its 11,000+-foot runway and full instrument landing capability,  
2 with good freeway access and location, was and is a logical alternative to consider. However, for  
3 purely political reasons the PSRC advisory committee and its consultants were precluded from even  
4 considering the most logical alternative within Puget Sound.  
5

6 6. After reviewing 26 potential sites for a major supplemental airport as an alternative to  
7 expanding STIA, our advisory committee and Tams Consultants, Inc. concluded that three sites passed  
8 initial feasibility, cost, location, and environmental review and were worthy of additional detailed  
9 study. These sites were near Arlington in Snohomish County, near Tanawax Lake in Pierce County,  
10 and in east King County. In accord with the PSRC enabling resolutions, the recommendations of the  
11 advisory committee were to proceed to additional study. However, again for purely political reasons  
12 the full PSRC Board rescinded these instructions and voted to not proceed with any additional studies.  
13 This decision was not based upon any additional scientific, environmental, or economic analysis.  
14

15 7. Significantly, the PSRC Resolution ultimately adopted for the Third Runway also  
16 includes a requirement for siting a new regional airport. That provision has never been pursued or  
17 implemented, although the need for such an airport has been generally acknowledged. At best then, if  
18 needed at all, the Third Runway's role was to be a stopgap until such a new airport was built.  
19

20 8. Recent events have suggested that whatever public interest there was in construction of  
21 the Third Runway has been severely diminished in light of uncertainty about the future nature of air  
22 travel and of airports themselves. Questions of access and configuration, frequency of flights, and  
23 financing, must all be assessed. Nothing in the PSRC resolution addressed these extraordinary issues,  
24

25 DECLARATION OF ROBERT OLANDER IN  
SUPPORT OF ACC'S MOTION FOR STAY - 3

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**AR 000168**



1 just as environmental ones were not addressed. Neither the PSRC nor any other body, in my  
 2 experience, have ever identified a public interest in construction of a Third Runway which would  
 3 "override" the public interest in proper clean water review and, now, in the wake of September 11, in a  
 4 careful assessment of whether there is any public interest, let alone an overriding one, in continuing  
 5 with the project.  
 6

7 I declare under penalty of perjury under the laws of the State of Washington that the foregoing  
 8 is true and correct.

9 DATED this 5<sup>th</sup> day of October, 2001, at Des Moines, Washington.

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 11   
 12 Robert Olander  
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25 DECLARATION OF ROBERT OLANDER IN  
 SUPPORT OF ACC'S MOTION FOR STAY - 4

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**AR 000170**

POLLUTION CONTROL HEARINGS BOARD  
FOR THE STATE OF WASHINGTON

AIRPORT COMMUNITIES ) No. 01-133  
COALITION, ) No. 01-160  
Appellant, )  
v. ) DECLARATION OF ROBERT  
STATE OF WASHINGTON, ) SHECKLER IN SUPPORT OF ACC'S  
DEPARTMENT OF ECOLOGY; and ) REPLY ON MOTION FOR STAY  
THE PORT OF SEATTLE, )  
Respondents. ) (Section 401 Certification No.  
1996-4-02325 and CZMA  
concurrency statement, issued August  
10, 2001, Reissued September 21,  
2001, under No. 1996-4-02325  
(Amended-1))

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Robert Sheckler declares as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts stated herein.

2. I am Mayor Pro Tem and a City Councilmember for the City of Des Moines, Washington. I am also Chair of the Airport Communities Coalition (ACC) Executive Committee. The ACC Executive Committee, per interlocal agreement of the ACC jurisdictions (Burien, Des Moines, Federal Way, Normandy Park, Tukwila, and the Highline School District), has engaged a number of independent scientists and technical experts to review and comment on the Port of Seattle's successive Clean Water Act Section 401 applications for certification of the Port's third runway and related major projects.

3. ACC has taken an active role in this process because of the dramatic effect which construction of the third runway would have on our member jurisdictions. We have particular

DECLARATION OF ROBERT SHECKLER IN  
SUPPORT OF ACC'S MOTION FOR STAY - 1

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**AR 000171**

1 stewardship responsibilities under state law and our own municipal codes for the streams and  
2 watersheds within our boundaries, including Des Moines Creek, Miller Creek, Walker Creek, and  
3 Gilliam Creek, as well as various small lakes, all of which will be affected by the Port's projects. The  
4 value of these resources to the communities is illustrated by how we use them.  
5

6 4. For example, the mouth of Des Moines Creek is located in Des Moines Beach Park, a  
7 major focus for our community. The park includes a marina, senior center and numerous historical  
8 buildings, and is enjoyed by South King County residents as a whole for its water-oriented amenities.  
9 Based in part on its concern for this park, the City of Des Moines takes very seriously its stewardship  
10 responsibilities for the creek and its watershed.  
11

12 5. Similarly, as ACC's original Notice of Appeal to this Board, filed in August, describes,  
13 the Normandy Park Community Recreation Center sits at the mouth of Miller Creek. This community  
14 beach parcel includes a community club building, tennis courts, swim club, baseball fields, boat launch  
15 and picnic areas on the beach and near the streams. Miller and Walker Creeks flow around and  
16 through the community center property, providing a beautiful natural setting for community activities.  
17 From an early age and through their school years, children are taught about and enjoy the streams and  
18 lakes and participate in field trips and stream restoration projects on them. Over the years our  
19 community groups have undertaken significant efforts to protect and enhance these streams and make  
20 them fish-friendly. Many residents fish in the streams and lakes.  
21

22 6. I am aware that some of the statements submitted to this Board in opposition to ACC's  
23 request for a stay, including statements by Department of Ecology personnel, suggest that the Port's  
24

25 DECLARATION OF ROBERT SHECKLER IN  
SUPPORT OF ACC'S MOTION FOR STAY - 2

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**AR 000172**

1 proposal should be viewed as a stream restoration project, reversing supposed neglect by our  
2 communities. This presents an inaccurate and distorted picture to the Board. The homes and  
3 neighborhoods whose elimination the Port and Ecology cite as elements of the “restoration” project  
4 were mature rural/suburban communities. These should not be confused with the gashes across the  
5 environment which new plats in other locations may sometimes create. The neighborhoods’ vegetation  
6 is mature, the houses by and large modest, and the lots not intensely developed. The Port’s and  
7 Ecology’s attempt to demonize these mature neighborhoods which were living in supportive co-  
8 existence with the area streams and wetlands into entities whose obliteration is synonymous with  
9 watershed restoration is a gross distortion.  
10

11           7.       In fact, those neighborhoods and our communities as a whole have valued and protected  
12 the quantity and quality of water in our streams. We are vitally concerned about the headwaters and  
13 wetlands of those streams which are within the third runway project construction impact area, and,  
14 based on advice from our scientists, we are particularly concerned that Ecology’s 401 Certification  
15 does a disservice to the community because it is not based on actual reasonable assurance that water  
16 quality standards will not be violated.  
17

18           8.       As ACC Chair, and as a long-time elected official in this area, I can therefore convey to  
19 the Board that the Ecology and Port claims of “overriding public interest” in opposition to a stay are  
20 not well-founded. For example, I am aware that the Department of Ecology suggests that a stay of its  
21 401 decision would prevent Ecology from providing environmental protections that would otherwise  
22 apply as the Port proceeds with construction work. In fact, Ecology, despite repeated requests, has not  
23  
24

25 DECLARATION OF ROBERT SHECKLER IN  
SUPPORT OF ACC’S MOTION FOR STAY - 3

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**AR 000173**

1 offered any environmental protection for work which the Port has already performed over the past  
2 many months at what the Port calls "its own risk." We appreciate that Ecology has, belatedly,  
3 apparently come to the realization that such work ought to be subject to environmental regulation. It  
4 does not make sense, however, to suggest that the need for environmental protection creates an  
5 overriding public interest against a stay of a 401 decision which, if implemented, will not protect water  
6 quality, according to ACC's scientists and Ecology's own former senior 401 expert.

8 9. I am also aware of the Port's arguments for overriding public interest, which basically  
9 amount to a claim that the Port cannot afford to lose a single day in pursuing its third runway project.  
10 In fact, the Port itself delayed the project for several years by failing to submit competent application  
11 materials to Ecology for 401 certification. The Port's first 401 application resulted in a decision by  
12 Ecology which the Port promptly appealed, claiming that it was too stringent. That certification and  
13 the Port's application were subsequently withdrawn when it was learned that the Port had not  
14 accurately represented the amount of wetlands which would be impacted by its project. The Port's  
15 second 401 certification application, submitted in the fall of 1999, was withdrawn one year ago, when  
16 the Port was advised by Ecology that, if it were not withdrawn, it would have to be denied. Shortly  
17 after, Tom Luster, Ecology's longtime 401 expert who had given the public at large some basis for  
18 confidence in Ecology's review process, was abruptly removed from responsibility for review of the  
19 Port application. The Port then subsequently reapplied for a third time and obtained certification  
20 approval in August, 2001. As the Board knows, Ecology later rescinded and reissued its August  
21  
22  
23  
24

25 DECLARATION OF ROBERT SHECKLER IN  
SUPPORT OF ACC'S MOTION FOR STAY - 4

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**AR 000174**

1 certification in September, 2001, with amendments to satisfy Port complaints about the August  
2 conditions.

3 10. ACC scientists -- and Tom Luster -- have testified in writing to the Board that the flaws  
4 in the first two applications were not cured in the third, and that the difference appears to be in how  
5 Ecology has viewed the application, applied the applicable standards for 401 certification, and allowed  
6 the Port to defer resolution of issues which have been outstanding now for more than three years.

7  
8 11. In light of this history of delay by the Port, its suggestion that the Board should deny a  
9 stay of the 401 because there is an overriding public interest in immediate commencement of the  
10 project, which can brook no delay, does not ring true. The overriding public interest here must be in  
11 the integrity of the 401 certification process, whose ultimate goal is to protect water quality. The  
12 history of the Port's applications and the basis on which its third application was finally approved  
13 demonstrate that the overriding public interest here must be in ensuring that the Board has an  
14 opportunity to review the 401 Certification and make an effective decision on it before implementation  
15 commences. At best, the "public interest" which the Port and Ecology cites is one among many, and  
16 does not override these vital considerations.  
17  
18

19 I declare under penalty of perjury under the laws of the State of Washington that the  
20 foregoing is true and correct.

21 DATED this 6<sup>th</sup> day of October, 2001, at DES MOINES, Washington.

22  
23   
Robert Sheckler

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25 DECLARATION OF ROBERT SHECKLER IN  
SUPPORT OF ACC'S MOTION FOR STAY - 5

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AR 000175

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ENVIRONMENTAL  
HEARINGS OFFICE

The Honorable Bruce Hilyer

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SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

PORT OF SEATTLE, a port district of the  
State of Washington,

Petitioner,

v.

THE POLLUTION CONTROL HEARINGS  
BOARD, an agency of the State of  
Washington; AIRPORT COMMUNITIES  
COALITION; and CITIZENS AGAINST  
SEATAC EXPANSION,

Respondents,

v.

STATE OF WASHINGTON,  
DEPARTMENT OF ECOLOGY, an agency  
of the State of Washington,

Respondent Below.

NO. 02-2-25658-9 SEA

CERTIFICATE OF SERVICE

I, Andrea Grad, an employee of Helsell Fetterman LLP, attorneys for Respondent Airport  
Communities Coalition, certify that:

I am now, and at all times herein mentioned was, a citizen of the United States, a resident of  
the State of Washington, and over the age of eighteen years.

On October 4, 2002, I caused to be sent via facsimile (without Declaration attachments) and  
via U.S. Mail, First Class (with Declaration attachments), a true and correct copy of a letter dated

**AR 000176**

CERTIFICATE OF SERVICE - 1

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**ORIGINAL**



1 October 4, 2002, from Peter Eglick to Hon. Kaleen Cottingham, and the Declaration of Kevin Stock  
2 in Response to Port of Seattle's Application for Direct Review in the above-captioned case to:  
3

4 Joan Marchioro  
5 Thomas Young  
6 Jeff Kray  
7 Assistant Attorneys General  
8 Ecology Division  
9 P.O. Box 40117  
10 Olympia, WA 98504-0117  
11 Fax: (360) 586-6760

Linda Strout  
Traci Goodwin  
Port of Seattle, Legal Dept.  
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Fax: (206) 728-3205

9 Jean Wilkinson  
10 Assistant Attorney General  
11 P. O. Box 40100  
12 Olympia, WA 98504-0100  
13 Fax: (360) 664-0174

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Fax: (206) 292-6301

13 Richard A. Poulin  
14 Smith & Lowney PLLC  
15 2317 East John Street  
16 Seattle, WA 98112  
17 Fax: (206) 860-4187

16 In addition, I caused the above-referenced documents to be hand-delivered on October 4,  
17 2002, to:

18  
19 Roger Pearce  
20 Patrick Mullaney  
21 Foster Pepper & Shefelman PLLC  
22 1111 Third Avenue, Suite 3400  
23 Seattle, WA 98101

24 I certify under penalty of perjury under the laws of the State of Washington that the  
25

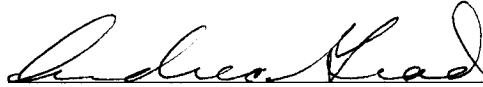
**AR 000177**

1 foregoing is true and correct.

2 DATED this 7<sup>th</sup> day of October, 2002, at Seattle, Washington.

3

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\_\_\_\_\_  
Andrea Grad

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**AR 000178**