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POLLUTION CONTROL HEARINGS BOARD
FOR THE STATE OF WASHINGTON

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5	AIRPORT COMMUNITIES COALITION,)	
6	Appellant,)	No. 01-133
7	v.)	No. 01-160
8	STATE OF WASHINGTON,)	ACC's MOTION FOR PERMISSION TO
9	DEPARTMENT OF ECOLOGY; and)	FILE OVERLENGTH REPLY BRIEF
10	THE PORT OF SEATTLE,)	(Section 401 Certification No.
11	Respondents.)	1996-4-02325 and CZMA concurrency
12	_____)	statement, issued August 10, 2001,
13		Reissued September 21, 2001, under No.
14		1996-4-02325 (Amended-1))

Appellant Airport Communities Coalition moves the Board for an order permitting it to file an overlength brief in reply to Respondents Department of Ecology and Port of Seattle's opposition papers in response to ACC's Motion for Stay. Pursuant to the Board's September 7, 2001 letter, briefs are limited to 30 pages in length. ACC requests permission to file the attached 46 page reply brief. ACC is in need of the additional 16 reply pages for the following reasons:

1. In response to ACC's Motion for Stay, Respondent Department of Ecology filed a 26 page brief and 7 declarations totaling 66 pages together with over a hundred pages of attached exhibits. Respondent Port of Seattle filed a 30 page brief and 15 declarations totaling 155 pages together with several thousand pages of exhibits. While some of the arguments presented by Ecology and the Port are duplicative, others are not. Rather than write a separate reply to each response (an approach that would have allowed ACC 60 pages), ACC has consolidated its reply into the single 46 page reply being filed herewith.

ACC MOTION FOR PERMISSION TO
FILE OVERLENGTH REPLY BRIEF - 1

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