

RECEIVED

OCT - 8 2001

ENVIRONMENTAL  
HEARINGS OFFICE

POLLUTION CONTROL HEARINGS BOARD  
FOR THE STATE OF WASHINGTON

AIRPORT COMMUNITIES COALITION, )  
Appellant, )  
v. )  
STATE OF WASHINGTON, )  
DEPARTMENT OF ECOLOGY; and )  
THE PORT OF SEATTLE, )  
Respondents. )  
\_\_\_\_\_ )  
)

No. 01-133  
No. 01-160

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

(Section 401 Certification No.  
1996-4-02325 and CZMA concurrency  
statement, Amended September 21, 2001,  
Related to Construction of a Third  
Runway and related projects at Seattle  
Tacoma International Airport)

Stephen L. M. Hockaday 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 have more than 25 years of experience in airport and airspace planning, design, and operations for government, industry and universities. I am a registered professional civil engineer and environmental engineer. I am employed at California Polytechnic State University, San Luis Obispo (Cal Poly), where I am a Professor in the Civil and Environmental Engineering Department. At Cal Poly, I conduct air traffic management research for NASA, focusing on the need for co-ordination between airport arrival and departure runway management functions.

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

ORIGINAL

AR 006948

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

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

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

- 2

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

**AR 006949**

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

16           10.      The adverse impacts of the events of September 11 include:  
17

- 18                   • the reduction in the financial health of the region and the nation,
- 19                   • a decline in passenger demand and aircraft operations,
- 20                   • the rapid deterioration in the financial condition of airlines, and
- 21                   • the increased costs and reduced revenues of airport operators.
- 22

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

- 3

Seattle, WA 98101-2509

Spokane, WA 99201

**AR 006950**

11. **The reduction in the financial health of the region and the nation impacts**

both the amount of air travel and the ability of communities to support expensive infrastructure programs.

12. **The Business Travel Coalition, an advocacy group for business travelers,**

conducted a survey of 137 corporations and found that through the end of the year, 81 percent plan to travel much less than they did before the attacks. The survey found that business air travel is on track to be 50 percent less in January 2002 than in January 2001.

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

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

13. **Communities in the vicinity of airports are suffering from drops in commercial**

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

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

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

22       16.     FAA benchmark data show that Sea-Tac was operating efficiently in 2000. This  
23 efficiency resulted from the excess of runway capacity that is available for most of the year. This  
24

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

- 5

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

**AR 006952**

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

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

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

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

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

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

24 DECLARATION OF  
25 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

- 6

Seattle, WA 98101-2509

Spokane, WA 99201

**AR 006953**

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."*

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

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

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

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

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

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

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

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

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

29 DECLARATION OF  
30 STEPHEN L. M. HOCKADAY  
31 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

- 7

Seattle, WA 98101-2509

Spokane, WA 99201

**AR 006954**





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**

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

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

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

- 10

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

**AR 006957**

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           34.     There are many alternative means for accommodating aviation demand that do not  
9 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           36.     Use of larger aircraft and higher load factors are naturally occurring phenomena  
15 already under way at Sea-Tac. Airlines and other aircraft operators have made sound business  
16 decisions to use larger aircraft and thereby reduce the number of aircraft operations.

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

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

23  
24  
25  
DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY

- 11

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

**AR 006958**

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  
21  
22  
23

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

- 12

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

**AR 006959**

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

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

- 13

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

**AR 006960**

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

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

- 14

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

**AR 006961**

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  
21  
22  
23

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

- 15

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

**AR 006962**

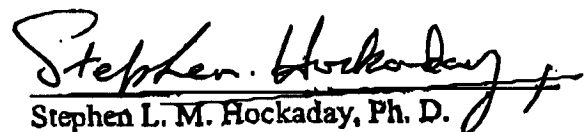
1 airport can continue to accommodate regional demand while the best long-term alternatives are  
2 being identified. There is now an opportunity to revisit regional planning studies and develop of  
3 a good aviation system to serve the longer-term interests of the Puget Sound region.

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

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

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

15  
16   
17 Stephen L. M. Hockaday, Ph. D.

18  
19  
20  
21  
22  
23 AR 006963

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

HELSELL PETERMAN LLP  
1500 Puget Sound Plaza  
1325 Fourth Avenue

Rachael Paschal Osborn  
Attorney at Law  
2421 West Mission Avenue



**List of Exhibits**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 17

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

**AR 006964**



**EXHIBIT A**

**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

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

- 18

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

**AR 006966**

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

24  
25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 19

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

**AR 006967**

- 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.

24

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

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

**AR 006968**

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

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

- 21

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

**AR 006969**

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

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

- 22

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

**AR 006970**

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

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

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

- 23

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

**AR 006971**



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

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         |

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

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

10  
11 International

12  
13 Belgium Germany  
14 Great Britain Greece  
15 Hong Kong Japan  
16 Malaysia Mexico  
17 New Zealand Philippines

18  
19 Background

20  
21 Dr. Hockaday is Professor of Civil and Environmental Engineering at California Polytechnic  
22 State University, San Luis Obispo. In this position, he has conducted applied research and taught  
23 graduate and under-graduate classes in air and surface transportation. He served for six years as

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

- 25

Seattle, WA 98101-2509

Spokane, WA 99201

**AR 006973**

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.

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY

- 26

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

**AR 006974**

**EXHIBIT**

**AR 006975**

**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

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 27

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 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 Paramount 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.

24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123  
124  
125  
126  
127  
128  
129  
130  
131  
132  
133  
134  
135  
136  
137  
138  
139  
140  
141  
142  
143  
144  
145  
146  
147  
148  
149  
150  
151  
152  
153  
154  
155  
156  
157  
158  
159  
160  
161  
162  
163  
164  
165  
166  
167  
168  
169  
170  
171  
172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221  
222  
223  
224  
225  
226  
227  
228  
229  
230  
231  
232  
233  
234  
235  
236  
237  
238  
239  
240  
241  
242  
243  
244  
245  
246  
247  
248  
249  
250  
251  
252  
253  
254  
255  
256  
257  
258  
259  
260  
261  
262  
263  
264  
265  
266  
267  
268  
269  
270  
271  
272  
273  
274  
275  
276  
277  
278  
279  
280  
281  
282  
283  
284  
285  
286  
287  
288  
289  
290  
291  
292  
293  
294  
295  
296  
297  
298  
299  
300  
301  
302  
303  
304  
305  
306  
307  
308  
309  
310  
311  
312  
313  
314  
315  
316  
317  
318  
319  
320  
321  
322  
323  
324  
325  
326  
327  
328  
329  
330  
331  
332  
333  
334  
335  
336  
337  
338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382  
383  
384  
385  
386  
387  
388  
389  
390  
391  
392  
393  
394  
395  
396  
397  
398  
399  
400  
401  
402  
403  
404  
405  
406  
407  
408  
409  
410  
411  
412  
413  
414  
415  
416  
417  
418  
419  
420  
421  
422  
423  
424  
425  
426  
427  
428  
429  
430  
431  
432  
433  
434  
435  
436  
437  
438  
439  
440  
441  
442  
443  
444  
445  
446  
447  
448  
449  
450  
451  
452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486  
487  
488  
489  
490  
491  
492  
493  
494  
495  
496  
497  
498  
499  
500  
501  
502  
503  
504  
505  
506  
507  
508  
509  
510  
511  
512  
513  
514  
515  
516  
517  
518  
519  
520  
521  
522  
523  
524  
525  
526  
527  
528  
529  
530  
531  
532  
533  
534  
535  
536  
537  
538  
539  
540  
541  
542  
543  
544  
545  
546  
547  
548  
549  
550  
551  
552  
553  
554  
555  
556  
557  
558  
559  
560  
561  
562  
563  
564  
565  
566  
567  
568  
569  
570  
571  
572  
573  
574  
575  
576  
577  
578  
579  
580  
581  
582  
583  
584  
585  
586  
587  
588  
589  
590  
591  
592  
593  
594  
595  
596  
597  
598  
599  
600  
601  
602  
603  
604  
605  
606  
607  
608  
609  
610  
611  
612  
613  
614  
615  
616  
617  
618  
619  
620  
621  
622  
623  
624  
625  
626  
627  
628  
629  
630  
631  
632  
633  
634  
635  
636  
637  
638  
639  
640  
641  
642  
643  
644  
645  
646  
647  
648  
649  
650  
651  
652  
653  
654  
655  
656  
657  
658  
659  
660  
661  
662  
663  
664  
665  
666  
667  
668  
669  
670  
671  
672  
673  
674  
675  
676  
677  
678  
679  
680  
681  
682  
683  
684  
685  
686  
687  
688  
689  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
700  
701  
702  
703  
704  
705  
706  
707  
708  
709  
710  
711  
712  
713  
714  
715  
716  
717  
718  
719  
720  
721  
722  
723  
724  
725  
726  
727  
728  
729  
730  
731  
732  
733  
734  
735  
736  
737  
738  
739  
740  
741  
742  
743  
744  
745  
746  
747  
748  
749  
750  
751  
752  
753  
754  
755  
756  
757  
758  
759  
760  
761  
762  
763  
764  
765  
766  
767  
768  
769  
770  
771  
772  
773  
774  
775  
776  
777  
778  
779  
780  
781  
782  
783  
784  
785  
786  
787  
788  
789  
790  
791  
792  
793  
794  
795  
796  
797  
798  
799  
800  
801  
802  
803  
804  
805  
806  
807  
808  
809  
810  
811  
812  
813  
814  
815  
816  
817  
818  
819  
820  
821  
822  
823  
824  
825  
826  
827  
828  
829  
830  
831  
832  
833  
834  
835  
836  
837  
838  
839  
840  
841  
842  
843  
844  
845  
846  
847  
848  
849  
850  
851  
852  
853  
854  
855  
856  
857  
858  
859  
860  
861  
862  
863  
864  
865  
866  
867  
868  
869  
870  
871  
872  
873  
874  
875  
876  
877  
878  
879  
880  
881  
882  
883  
884  
885  
886  
887  
888  
889  
890  
891  
892  
893  
894  
895  
896  
897  
898  
899  
900  
901  
902  
903  
904  
905  
906  
907  
908  
909  
910  
911  
912  
913  
914  
915  
916  
917  
918  
919  
920  
921  
922  
923  
924  
925  
926  
927  
928  
929  
930  
931  
932  
933  
934  
935  
936  
937  
938  
939  
940  
941  
942  
943  
944  
945  
946  
947  
948  
949  
950  
951  
952  
953  
954  
955  
956  
957  
958  
959  
960  
961  
962  
963  
964  
965  
966  
967  
968  
969  
970  
971  
972  
973  
974  
975  
976  
977  
978  
979  
980  
981  
982  
983  
984  
985  
986  
987  
988  
989  
990  
991  
992  
993  
994  
995  
996  
997  
998  
999  
1000

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 28

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

**AR 006977**

**EXHIBIT C**

**AR 006978**

**EXHIBIT C**

**Horizon Air and Alaska Air Seattle Flight Cancellations**

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

<b>Flight</b>	<b>Departs</b>	<b>Arrives</b>	<b>Cancelled</b>	<b>Effective Period</b>
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

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



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
	2301	Seattle 8:30 am	Pullman/Moscow 9:40am Mon-Fri	9/17/01 - 10/20/01
6	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
	2376	Seattle 2:00 pm	Spokane 2:59 pm All Week	9/17/01 - 10/20/01
13	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
	2102	Seattle 3:25 pm	Pasco 4:20 pm All Week	9/17/01 - 10/20/01
16	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
	2223	Seattle 6:00 pm	Portland 6:50 pm All Week	9/17/01 - 10/20/01
23	2049	Seattle 6:30 pm	Spokane 7:35 pm Mon-Fri & Sun	9/17/01 - 10/20/01

24  
25  
DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 30

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

**AR 006980**

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
	2231	Vancouver, BC 9:10 pm	Seattle 9:59 pm	Mon-Fri & Sun	9/17/01 - 10/20/01
16	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
	2091	Wenatchee 9:30 am	Seattle 10:15 am	All Week	9/17/01 - 10/20/01
19	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

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

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

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

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
3		499	Burbank 10:23 am	Seattle 1:00 pm
4		663	Las Vegas 9:15 am	Seattle/Tacoma 11:52 am
5		693	Las Vegas 5:30 pm	Seattle/Tacoma 7:59 pm
6		661	Las Vegas 11:05 pm	Seattle/Tacoma 1:34 am
7		423	Los Angeles (LAX) 6:15 am	Seattle 8:51 am
8	Mon-Fri)	479	Los Angeles (LAX) 7:00 am	Seattle 9:36 am (exception: operates Sun and
9		595	Los Angeles (LAX) 10:30 am	Seattle 1:02 pm
10		579	Los Angeles (LAX) 2:35 pm	Seattle 6:22 pm
11	Mon-Fri)	599	Los Angeles (LAX) 5:30 pm	Seattle 8:06 pm (exception: operates Sun and
12		475	Los Angeles (LAX) 6:30 pm	Seattle 9:04 pm
13		293	Los Angeles (LAX) 7:00 pm	Seattle 9:34 pm
14		481	Los Angeles (LAX) 8:45 pm	Seattle 11:22 pm
15		393	Oakland 6:15 am	Seattle/Tacoma 8:15 am
16		395	Oakland 12:28 pm	Seattle/Tacoma 2:20 pm
17		433	Oakland 8:00 pm	Seattle/Tacoma 9:55 pm
18		513	Ontario, CA 3:35 pm	Seattle/Tacoma 6:05 pm
19		493	Orange County 7:23 pm	Seattle/Tacoma 9:58 pm
20		759	Phoenix 1:40 pm	Seattle/Tacoma 4:32 pm
21		731	Phoenix 6:42 pm	Seattle/Tacoma 9:42 pm
22		323	Portland 12:15 pm	Seattle/Tacoma 1:07 pm
23		621	Reno 9:22 am	Seattle/Tacoma 11:09 am
24		353	Sacramento 11:26 am	Seattle/Tacoma 1:12 pm
25		427	Sacramento 11:26 am	Seattle/Tacoma 1:12 pm
		349	Sacramento 2:56 pm	Seattle/Tacoma 4:42 pm
		525	San Diego 5:11 pm	Seattle/Tacoma 7:56 pm
		563	San Diego 9:00 pm	Seattle/Tacoma 11:40 pm
		325	San Francisco 11:55 am	Seattle/Tacoma 1:53 pm
		379	San Francisco 2:18 pm	Seattle/Tacoma 4:13 pm
		199	San Francisco 5:41 pm	Seattle/Tacoma 7:37 pm
		347	San Jose 8:15 pm	Seattle/Tacoma 10:21 pm
		650	Seattle/Tacoma 6:05 am	Las Vegas 8:29 am
		434	Seattle/Tacoma 6:15 am	Portland 7:03 am
		798	Seattle/Tacoma 6:30 am	San Jose 8:35 am
		236	Seattle/Tacoma 6:45 am	Los Angeles 9:28 am
		604	Seattle/Tacoma 7:05 am	Reno 8:47 am

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

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

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 33

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

**AR 006983**

**EXHIBIT**

**AR 006984**

**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>

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

- 34

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

**AR 006985**

**EXHIBIT**

**AR 006986**

**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.

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 35

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

**AR 006987**



**EXHIBIT**

**AR 006988**

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.

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

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

- 36

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

**AR 006989**

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.

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

- 37

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

**AR 006990**

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

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

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

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

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

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

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

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

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

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.

© 2001, Dallas Morning News

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 38

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

**AR 006991**

**E  
X  
H  
I  
B  
I  
T**

**AR 006992**

**EXHIBIT G**

**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://seattlep-i.nwsourc.com/search/PIsearch.asp?UserQuery=%22airport%22&page=3&rank=date>

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

- 39

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

**AR 006993**

**E  
X  
H  
I  
B  
I  
T**

**AR 006994**

**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

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 40

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

**AR 006995**



AR 006996

E  
X  
H  
I  
B  
I  
T

**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.

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

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,  
3 originally set for Sept. 12, was postponed after the terrorist attacks.

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.  
6 The airline accounts for about a third of the airport's flights, said Bob Clem, the airport manager.

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  
9 airport spokeswoman. The airline accounted for more than 40 percent of the airport's flights.

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

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

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 Said Dinsmore, "I can't remember a time in the history of the Port when revenues dropped so  
17 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  
19 reached at 206-464-2595 or [agarber@seattletimes.com](mailto:agarber@seattletimes.com).*

20  
21 Copyright © 2001 The Seattle Times Company

22  
23  
24  
25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY

- 42

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

**AR 006998**



**EXHIBIT J**

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

**Current Rating List**

<i>Securities</i>	<i>Sale Date</i>	<i>Sale Amt</i>	<i>Underlying</i>	<i>Enhanced</i>	<i>Insured</i>	<i>Watchlist</i>	<i>Watch Date</i>
<b>General Obligation</b>			Aa1/VMIG 1		N		
<b>Port Revenue Parity lien</b>	31 JAN 1990	145.21	Aa3		N		
<b>Port Revenue Parity lien</b>	2 JUN 1992	168.39	Aa3		N		
<b>Port Revenue Parity lien</b>	2 FEB 1993	82.41	Aa3	Aaa	N		
<b>Port Revenue Parity lien Series 1994 A, B &amp; C</b>	4 FEB 1994	128.89	Aa3		N		
<b>Port of Seattle General Obligation Limited Tax</b>	9 MAR 1994	154.69	Aa1		N		
<b>Port Revenue Parity lien</b>	2 APR 1996	106.34	Aa3	Aaa	N		
<b>Port Revenue Parity lien</b>	1 MAY 1997	140.36	Aa3	Aaa	N		
<b>Port Revenue Parity lien</b>	6 MAY 1998	73.18	Aa3	Aaa	N		
<b>Port Revenue Subordinate lien</b>	6 MAY 1998	27.93		Aaa	N		

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

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

[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&searchQuery=Port+of+Seattle%2C+WA&search=1&searchresult=named&searchIdent=qcksear)

ch

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 44

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

**AR 007001**

**EXHIBIT**

**AR 007002**

**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

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



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

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

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 47

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

**AR 007005**

**EXHIBIT**

**AR 007006**

1 **EXHIBIT L**

2 **A Third Runway at Sea-Tac is not Needed, Causes Harm**  
3 **and Does Not Solve Regional Problems**  
4

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

- 7
- 8 **1. A Third Runway is Not Needed**
  - 9 **2. Better Alternatives Are Available**
  - 10 **3. A Third Runway is Inefficient**
  - 11 **4. Significant Safety Problems Exist**
  - 12 **5. Regional Impacts of a Third Runway are Severe**
  - 13 **6. There are Major Environmental Problems**

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

15 Sea-Tac operated successfully last year, with 446,066 total aircraft operations in the year 2000.  
16 Delays at Sea-Tac in 2000 were low, according to FAA. The FAA benchmark report data  
17 showed that only 1% of the aircraft were delayed significantly with the existing airfield layout.  
18 The FAA data also showed that Sea-Tac ranked 20<sup>th</sup> in the nation in terms of delay. Sea-Tac  
19 delays were on average less than one third of the delays at the other top 20 airports. At Sea-Tac,  
20 for each aircraft in 2000 that had a significant delay (more than of 15 minutes), there were 99  
21 aircraft that did not have a significant delay. The most delayed airport in the nation (La Guardia)  
22 had delays 15 times worse than Sea-Tac.  
23

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

- 48

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

**AR 007007**

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.

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

- 49

Seattle, WA 98101-2509

Spokane, WA 99201

**AR 007008**

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  
24

25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 50

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

**AR 007009**

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).

24  
25  
DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 51

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

**AR 007010**

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,

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

- 52

Seattle, WA 98101-2509

Spokane, WA 99201

**AR 007011**



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.

21  
22  
23  
24  
25  
DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC’S MOTION FOR STAY  
- 53

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 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*

24  
25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 54

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

**AR 007013**

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.”*

10 (Port response 6 to February 16, 2001 ACC/PACI comment letter.)

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.

23  
24  
25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC’S MOTION FOR STAY  
- 55

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

**AR 007014**

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

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.  
23

24  
25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 56

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

**AR 007015**

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

20  
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

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

- 57

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

**AR 007016**

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 taxies 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.

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

- 58

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

**AR 007017**

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.*"

23  
24  
25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY

- 59

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

**AR 007018**

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.

25 DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC'S MOTION FOR STAY  
- 60

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

**AR 007019**



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  
24

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

- 61

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

**AR 007020**

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.

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

- 62

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

**AR 007021**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**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.

DECLARATION OF  
STEPHEN L. M. HOCKADAY  
IN SUPPORT OF ACC’S MOTION FOR STAY  
- 63

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

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

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

**PASSENGERS PER AIRCRAFT**

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

Source: Port of Seattle Aviation Activity Report

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

- 65

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

**AR 007024**