ECEIVE

## POLLUTION CONTROL HEARINGS BOARD FOR THE STATE OF WASHINGTON

OCT - 8 2001

2	1 011 1112 0		1 1111111111111111111111111111111111111	ENVIRONMENTA
3	AIRPORT COMMUNITIES COALITION,	)	No. 01-133	HEARINGS OFFIC
		)	No. 01-160	• • • • • • • • • • • • • • • • • • • •
4	Appellant,	)		
		)	DECLARATION OF ROBERT	
5	v.	)	OLANDER IN SUPPOR	RT OF ACC'S
6		)	<b>MOTION FOR STAY</b>	
	STATE OF WASHINGTON,	)		
7	DEPARTMENT OF ECOLOGY; and	)	(Section 401 Certification No.	
	THE PORT OF SEATTLE,	)	1996-4-02325 and CZMA concurrency	
8		)	statement, issued Augus	t 10, 2001,
9	Respondents.		Reissued September 21, 2001, under No.	
J		)	1996-4-02325 (Amende	d-1))
10				

## Robert Olander declares as follows:

1

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

- 1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts stated herein.
- 2. I am City Manager of the City of Des Moines and have served in that position since February of 1996. Prior to that I served as Assistant City Manager for the City of Des Moines from February of 1988. In those capacities I, I have followed and participated in proceedings of the Puget Sound Regional Council concerning airport planning. I served as a member of the Puget Sound Regional Council (PSRC) Advisory Committee charged with studying sites for a supplemental airport for the Puget Sound Region, I participated in PSRC meetings, read PSRC documents and reports on airport issues and testified before the PSRC on airport issues.
- 3. I have reviewed the Declarations of Gina Marie Lindsay and related submissions by the Port to the Board, as well as the Port's Memorandum Opposing ACC's Motion for Stay, concerning

DECLARATION OF ROBERT OLANDER IN SUPPORT OF ACC'S MOTION FOR STAY - 1

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

ORIGINAL

AR 007115

 the actions of the Puget Sound Regional Council on the Port of Seattle's proposed Third Runway.

These statements appear to suggest that the Pollution Control Hearings Board's review of the Airport Communities Coalition request for a stay of Ecology's Clean Water Act section 401 certification should be denied because the PSRC has adopted a resolution for construction of the third Runway. I submit this statement to give the Board the context in which the PSRC resolution was adopted and, further, to point out to the Board that there is nothing in the resolution which addresses Clean Water Act concerns or suggests that they need not be reviewed thoroughly before the project proceeds.

- 4. From approximately 1992 through 1994 the PSRC undertook a process to review regional air capacity to determine if a major supplemental airport in the Puget Sound region was feasible and might serve as an alternative to construction of a third runway at Seattle-Tacoma International Airport (STIA). The PSRC hired a consulting firm and appointed a Technical Advisory Committee to undertake this study and to make recommendations to the full board of the PSRC. Under the terms of the authorizing resolutions, if the advisory committee found any sites that passed initial cost, feasibility, and environmental review, the PSRC would then proceed with more detailed feasibility studies on the finalist sites. PSRC Resolution A-93-03: Implementation Steps, states in Section I.C.2., "If sites exist, consultants continue with environmental, financial, legal and market feasibility studies."
- 5. However, the PSRC process to search for alternatives to a third runway at STIA was fundamentally flawed from the beginning and throughout the process. The advisory committee was restricted in writing from even considering Paine Field as an alternative site (see PSRC Resolution

DECLARATION OF ROBERT OLANDER 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 DECLARATION OF ROBERT OLANDER IN SUPPORT OF ACC'S MOTION FOR STAY - 3

HELSELL FETTERMAN LLP 1500 Puget Sound Plaza 1325 Fourth Avenue Seattle, WA 98101-2509 Rachael Paschal Osborn Attorney at Law 2421 West Mission Avenue Spokane, WA 99201

A-93-03, Item 6). Paine Field, with its 11,000+-foot runway and full instrument landing capability, with good freeway access and location, was and is a logical alternative to consider. However, for purely political reasons the PSRC advisory committee and its consultants were precluded from even considering the most logical alternative within Puget Sound.

- 6. After reviewing 26 potential sites for a major supplemental airport as an alternative to expanding STIA, our advisory committee and Tams Consultants, Inc. concluded that three sites passed initial feasibility, cost, location, and environmental review and were worthy of additional detailed study. These sites were near Arlington in Snohomish County, near Tanawax Lake in Pierce County, and in east King County. In accord with the PSRC enabling resolutions, the recommendations of the advisory committee were to proceed to additional study. However, again for purely political reasons the full PSRC Board rescinded these instructions and voted to not proceed with any additional studies. This decision was not based upon any additional scientific, environmental, or economic analysis.
- 7. Significantly, the PSRC Resolution ultimately adopted for the Third Runway also includes a requirement for siting a new regional airport. That provision has never been pursued or implemented, although the need for such an airport has been generally acknowledged. At best then, if needed at all, the Third Runway's role was to be a stopgap until such a new airport was built.
- 8. Recent events have suggested that whatever public interest there was in construction of the Third Runway has been severely diminished in light of uncertainty about the future nature of air travel and of airports themselves. Questions of access and configuration, frequency of flights, and financing, must all be assessed. Nothing in the PSRC resolution addressed these extraordinary issues,

10-05-2001

1

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

02:59pm From-HELSELL F. RMAN

+2089402524

T-033 P.005/005

just as environmental ones were not addressed. Neither the PSRC nor any other body, in my experience, have ever identified a public interest in construction of a Third Runway which would "override" the public interest in proper clean water review and, now, in the wake of September 1, in a careful assessment of whether there is any public interest, let alone an overriding one, in continuing with the project.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing

is true and correct.

DATED this 5 day of October, 2001, at \_\_\_\_\_ Washington

Robert Olander

DECLARATION OF ROBERT OLANDER IN SUPPORT OF ACC'S MOTION FOR STAY - 4 HELSFLL PETTERMAN LLP 1500 Puget Sound Plaza 1325 Fourth Avenue Seattle, WA 98101-2509 Rachael Paschai (Jabor's Attorney at '-aw ' 2-21 West Missio: Aveigte Spokane, WA ;9201'