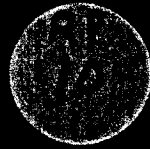


PCHB NO. 01-133

PORT OF SEATTLE'S
MEMO OPPOSING
ACC'S MOTION FOR STAY

ORIGINAL

Declaration of Mayor Paul Schell
Declaration of James Morasch
Declaration of Alan Ralston
Declaration of Michael Feldman
Declaration of Michael Cheyne
Declaration of Gina Marie Lindsey



AR 012937

RECEIVED

OCT - 1 2001

ENVIRONMENTAL
HEARINGS OFFICE

Declaration of
Mayor Paul Schell

AR 012938

RECEIVED

OCT - 1 2001

ENVIRONMENTAL
HEARINGS OFFICE

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POLLUTION CONTROL HEARINGS BOARD
FOR THE STATE OF WASHINGTON

Airport Communities Coalition,	
	Appellant,
v.	
Department of Ecology and The Port of Seattle,	
	Respondents.

No. PCHB 01-133

DECLARATION OF PAUL SCHELL

PAUL SCHELL declares as follow:

1. I am the Mayor of the City of Seattle ("City") and have served as Mayor since 1998. Prior to serving as Mayor, I served as a Commissioner of the Port of Seattle for nine years. Over my years of public service, I have gained an increasing understanding of the interrelationship between citizen and business needs, on the one hand, and regional air transportation capacity on the other.

2. In my capacity as Port Commissioner, I reviewed and listened first-hand to many hours of testimony related to regional air transportation capacity issues. That experience further developed my conviction that the economic well being of citizens in the Northwest and the City depends to a large extent on adequately and timely meeting the air transportation needs of our residents and businesses. Residents in the City depend on Seattle-Tacoma International Airport's

1 ("Sea-Tac") ability to provide commercial airline service on a timely basis throughout the region,
2 country and world. Hundreds of businesses located in the City also have a vital stake in Sea-Tac's
3 ability to promptly and efficiently import and export their goods.

4 3. More than ten years ago, it was generally recognized in the regional meetings in
5 which I participated that the facilities at Sea-Tac were ill-equipped to deal with weather-imposed
6 delays on commercial and freight airline service and that, over the long term, additional solutions
7 would be necessary to resolve the region's air transportation capacity challenges and to keep this
8 region economically competitive.

9 4. I participated in a number of regional planning activities designed to explore all
10 feasible alternatives and arrive at a regional policy decision on air transportation capacity. This
11 process culminated in the Puget Sound Regional Council's ("PSRC") adoption of Resolution A-96-
12 02, in July 1996. The Port of Seattle followed the PSRC's adoption of the resolution with a
13 project-specific decision to proceed with design and construction of the improvements included in
14 its Master Plan Update.

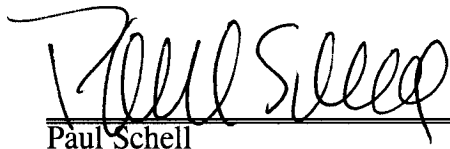
15 5. Given the complexity of the construction of the improvements included in the Port's
16 Master Plan Update, it is of vital importance to the citizens and businesses of Seattle that this
17 process get underway as soon as possible. A stay delaying the commencement of construction
18 would ill serve the needs of the residents of this region. I believe that each day lost in
19 commencing construction of the initial phases of the Master Plan Update program will result in
20 tangible and irreparable harm, whether measured in terms of delays experienced at any given time
21 by citizens or by the lost opportunity cost to businesses. Hundreds of businesses in the City
22 depend on timely delivery and export of goods in order to remain viable. These businesses would,
23 in my opinion, be adversely affected by any delay in the critical path schedules for Master Plan
24 Update improvements.
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6. One of my principal duties as a public official has been to promote an economic climate in this City and region that attracts desired businesses to this area. I believe that a stay delaying the commencement of work on Master Plan Update improvements may well deter and discourage businesses, which might otherwise be thinking of relocating in the City or Puget Sound, from locating here, and discourage businesses we are seeking to keep in this region from remaining here or siting any future expansion in this region.

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

Executed at Seattle, Washington this 27th day of September, 2001.


Paul Schell