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FILED
98 OCT -2 PM 4:27
KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA.

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR KING COUNTY

CITIZENS AGAINST SEATAC EXPANSION)

Petitioner/Plaintiff,

v.

PORT OF SEATTLE,

Respondent.

98-2-23944-1SEA

DECLARATION OF HELEN KLUDT
SUPPORTING PLAINTIFF'S PETITION
FOR A WRIT OF REVIEW

I, Helen Kludt, declare as follows:

1. I state the following under penalty of perjury under the laws of the State of Washington. I declare the following from personal knowledge and am competent to testify thereto in court if necessary.

2. My address is 17529 13th SW, Normandy Park, WA 98166. I am a resident of Washington State, and I have lived at this property – which I own – since 1956.

3. I am a member of plaintiff Citizens Against Seatac Expansion, ("CASE"), an organization which is dedicated to, among other things, serving as a watchdog and making the Port of Seattle obey the law.

4. I am familiar with the Port of Seattle's development activities at Seatac Airport, and I am quite familiar with the ways that the Port's activities impact Miller Creek and the Miller Creek Basin. My property directly abuts Miller Creek, and my home is only about 50 feet from the creek itself.

5. I am also familiar with the Port's plans for expansion and for building a third runway. I know that the Port wants to destroy wetlands in the Miller Creek Basin, and mitigate the environmental impacts way over in Auburn. I do not support this plan, and I do not approve of out-of-basin mitigation. I think the Port's proposed mitigation is inadequate, and illegal under SEPA.

6. I also believe the Port's decision to go ahead with the mitigation plan – and its failure to comply with SEPA – directly injures me. Miller Creek enhances the value of my property, and the Port's incremental destruction of the creek will reduce the value of my property. Besides the economic impact, I will be injured because the Port's actions and decisions will reduce the quality of wildlife habitat in the Miller Creek Basin. I enjoy watching the fish, otters, and salmon that live in Miller Creek, and I am concerned that the Port's activities will impair my ability to enjoy them. I recently saw the Port's careless construction of an employee parking lot cause major siltation in Miller Creek.

7. I am also concerned about flooding along Miller Creek. I've lived in my house for 42 years, and the creek has flooded just three times -- all of them in the past ten years. I am concerned that the flooding will get worse because of the Port's decision to destroy more wetlands in the Miller Creek Basin and mitigate the impacts elsewhere.

Declared under penalty of perjury in Normandy Park, Washington on this 1st day of October, 1998.

Helen Kludt
Helen Kludt