

SECOND  
DECLARATION OF  
DAVE SOIKE

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON; STATE  
OF CALIFORNIA; STATE OF  
MARYLAND; COMMONWEALTH  
OF MASSACHUSETTS; STATE OF  
NEW YORK; and STATE OF  
OREGON,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity as  
Acting Secretary of the Department of  
Homeland Security; REX  
TILLERSON, in his official capacity  
as Secretary of State; and the UNITED  
STATES OF AMERICA,

Defendants.

CIVIL ACTION NO. 2:17-cv-00141-JLR

SECOND  
DECLARATION OF DAVE SOIKE

Pursuant to 28 U.S.C. § 1746(2), I, Dave Soike, hereby declare as follows:

1. I am over the age of eighteen and competent to testify herein.
2. I am Interim Chief Executive Officer with the Port of Seattle.
3. The Port of Seattle is a government entity that represents the people of King County by advancing trade and commerce. We operate Seattle-Tacoma International Airport, serve as the

1 landlord for our seaport and cruise ship terminals and host the North Pacific fishing fleet,  
2 among other economic responsibilities. We receive lease fees from our tenants, as one part of  
3 a diversified revenue stream.

4 4. The Port of Seattle's Century Agenda is a blueprint for creating 100,000 new jobs in the Puget  
5 Sound region in the next 25 years. The Century Agenda contains, as two of its four Strategic  
6 Objectives, the goals to 1) position the Puget Sound region as a premier international logistics  
7 hub by growing seaport annual container volumes and tripling air cargo volumes, and 2)  
8 advancing this region as a leading tourism destination and business gateway through making  
9 Seattle-Tacoma International Airport (Sea-Tac) the West Coast "Gateway of Choice" for  
10 international travel and doubling the number of international flights and destinations.

11 5. The growth of the Port over the last several years has been driven mainly by our expanding  
12 international economic activity. The Northwest Seaport Alliance, which manages the  
13 container business of the Port of Seattle and the Port of Tacoma, moved more than 3.6 million  
14 Twenty-foot Equivalent Units ("TEUs") of containerized maritime cargo. Last year's 3.6  
15 million TEUs of containerized maritime cargo total is the highest number since 2007 and an  
16 increase of more than 2 percent from 2015 volumes, despite a decrease in domestic volumes  
17 of 1.5 percent for the year.

18 6. Sea-Tac International Airport served 45.7 million passengers in 2016, an 8 percent increase  
19 from 2015 – driven largely by an 11.1 percent increase in international passenger traffic over  
20 2015 numbers. In addition, over 114,000 metric tons of cargo were imported into Washington  
21 or exported out of Washington via Sea-Tac International Airport via airplane.

22 7. Overall, the total value of goods that were shipped through the Port of Seattle's container  
23 terminals was \$21.7 billion, and our airport supported the movement of almost \$27 billion in  
24 trade.

25 8. In terms of passengers, Sea-Tac International Airport served close to 4.9 million travelers via  
26 our international flights in 2016.

- 1 9. We estimate that each direct international route servicing Sea-Tac International Airport  
2 generates \$89.3 million annually to the State of Washington. This figure assumes that an  
3 airline flies, on average, four times per week for each direct international route. Currently, 24  
4 international destinations are accessible by direct flight from Sea-Tac International Airport,  
5 including Dubai in the United Arab Emirates via Emirates Airlines.
- 6 10. A portion of our international business activity is with the eight countries identified in  
7 President Trump's newly released "Presidential Proclamation Enhancing Vetting Capabilities  
8 and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other  
9 Public-Safety Threats." Specifically, two-way international trade (trade that includes products  
10 imported from another country into Washington and products exported out of Washington to  
11 other countries) through the Port of Seattle's seaport and airport exceeded \$8.4 million in  
12 calendar year 2016. This is compared to the \$5.3 million in 2016 two-way trade that was  
13 related to the six countries included in the original "Executive Order Protecting The Nation  
14 From Foreign Terrorist Entry Into The United States."
- 15 11. The United States Department of Transportation's (USDOT) international passenger origin  
16 and destination data is significantly limited in its ability to capture all travel by persons from  
17 specific countries into the United States. However, existing data shows that, in the twelve  
18 month period ending in July 2017, more than 6,600 passengers travelled between Sea-Tac and  
19 the eight countries identified in the Proclamation. This is compared to the approximately  
20 6,000 passengers travelling to and from the six countries included in the original "Executive  
21 Order Protecting The Nation From Foreign Terrorist Entry Into The United States."
- 22 12. The Port relies on this data in the ordinary course of business in order to understand the flow  
23 of travelers who use our airport. The USDOT's statistic captures the complete itineraries of  
24 U.S. airline passengers but only the itineraries of foreign flag carrier passengers if they  
25 connect to a domestic flight; therefore, the actual number of passengers travelling to and from  
26 those eight countries is expected to be higher, since it would include individuals whose final

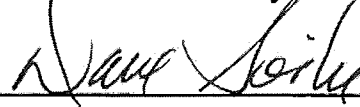
1 destination on a foreign flag carrier didn't include a domestic flight after they landed at Sea-  
2 Tac International Airport.

3 13. The seaport and airport goods trade data referenced is collected by WISERTrade, a  
4 proprietary database that uses available U.S. Customs data to track trade flows through U.S.  
5 ports. The Port subscribes to this database for up-to-date, accurate information on the goods  
6 traveling through our gateway, as well as their origin and destination. The estimation of  
7 economic impact of international flights is based on a study by Martin Associates,  
8 commissioned by the Port of Seattle as part of a regular measurement of the Port's overall  
9 economic impact. The Port relies on these sources of information in the ordinary course of  
10 business and operations.

11 14. As a public entity, the revenue generated by the Port is for the benefit of the residents of King  
12 County. According to the 2014 Martin Associates study, the Port's activities result in 129,744  
13 direct jobs and \$4.2 billion of direct wages and salaries. Businesses providing services at the  
14 Port-owned marine terminals and Sea-Tac International Airport, as well as real estate tenants,  
15 received \$19.8 billion of revenue, and \$894.4 million of state and local taxes were generated.

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17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed on this 10th day of October, 2017

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21 DAVE SOIKE  
22 Port of Seattle Interim Chief Executive Officer  
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