



FLIGHT PATH TO SAFE, SECURE, AND ACCESSIBLE AIRPORTS:

The Case for centering fair workplaces, community needs,
and passenger choice over airline's soaring profits



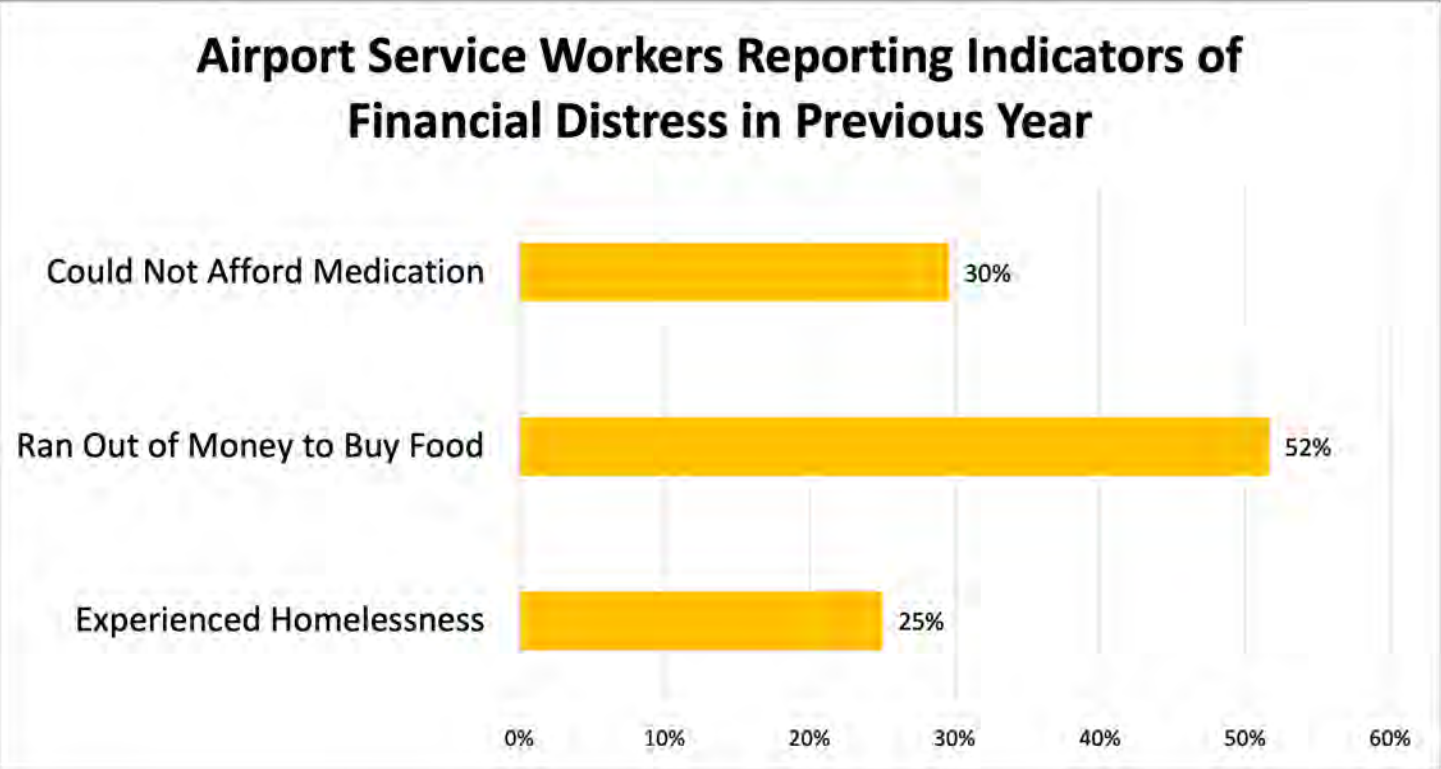


Executive Summary

Airports are vital public infrastructure that must operate safely, efficiently, and affordably while serving the needs of travelers, the community, and the working people who help make air travel possible. Our local airports are fueled by billions of our local, state, and federal tax dollars to ensure airports are a strong and resilient part of the national aviation system operated by an experienced workforce who are able to take appropriate action during weather disasters, security crises, and national emergencies. Airport service workers like cabin cleaners, baggage handlers, and wheelchair agents are on the front lines of this system, yet many are living in poverty.

A recent survey of airport service workers by the Service Employees International Union (SEIU, “Union”) in Phoenix (PHX), Dallas Fort-Worth (DFW), and Charlotte (CLT) airports (the locations with significant active Union campaigns) produced a clear picture of what low wages mean in people’s lives¹. Across the three cities, significant percentages of workers reported struggling to afford basic necessities, including running out of money for food (44% in CLT, 67% in DFW, 44% in PHX), lacking any form of health insurance coverage (61% in DFW, 54% in CLT, 33% in PHX), and experiencing homelessness (19% in DFW, 40% in CLT, 16% in PHX). Some workers have even reported sleeping on airport grounds at some point². Additionally, at DFW, a staggering 89% of workers lacked paid sick leave, forcing workers to choose between losing wages or coming to work sick (both a personal and public health hazard).

Importantly, however, poverty wages and poor working conditions aren’t just bad for workers—they also make airports less safe. A number of studies have shown that low wages result in higher airport worker turnover,³



which leads to greater numbers of less trained and less experienced workers in the workplace.⁴ In turn, workers are “less familiar with safety and security procedures ... less able to anticipate and identify potential hazards, and more uncertain about where to take their complaints or how to report problems.”⁵ In airports, where every worker has an important security function, a less experienced workforce is “correlated with more accidents and security violations, and may undermine airport security procedures in the event of an emergency.”⁶ This in turn affects all passengers but especially those with disabilities, who often rely on trained professionals for safe transfers to and from their seats, as well as the secure transport of essential equipment like wheelchairs.⁷

But right now American Airlines, which makes up the majority of passenger traffic at Charlotte,⁸ Dallas-Fort Worth,⁹ and Phoenix Sky Harbor International Airports,¹⁰ benefits from the aviation system at the expense of the safety, security, and economic stability in its sunbelt hubs. It's critical to rebalance the power dynamic with American Airlines and halt the billion-dollar corporation from extracting wealth from our public infrastructure, while the long term safety and prosperity of the region hangs in the balance.

American has half of its national hubs in the South and Southwest – commonly referred to as the sunbelt – like Phoenix, Charlotte, and Dallas-Fort Worth,¹¹ where it is able to use its outsized power to pressure the mid-sized cities and airport authorities to keep the airline's operating expenses low by passing the costs onto passengers, communities, and workers. American Airlines's dominance in these airports also means price competition is limited and local travelers are stuck paying sky high fares.

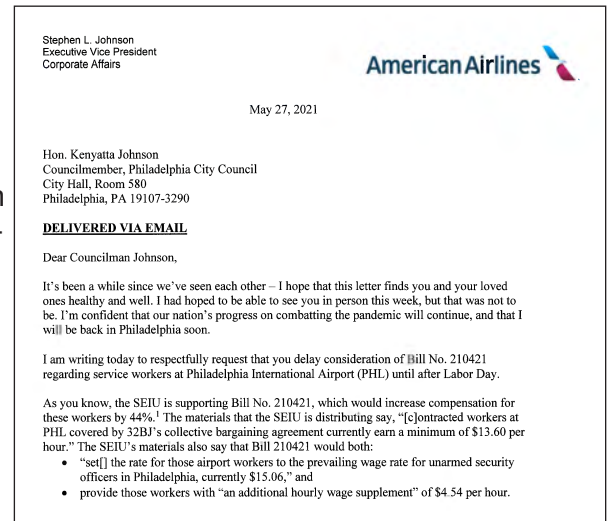
American Airlines' fees and costs for baggage and other “perks” has helped the airline turn a profit, but it comes at a very real cost to the airport service workers American relies on to assist disabled passengers, perform security sweeps of their cabins, and get luggage to passengers' final destination.

American Airlines carries the largest number of passengers among major carriers in the U.S.,¹² giving it a key role in setting standards for the industry. While it does not directly employ the employees surveyed by SEIU, the vast majority are employed by an American Airlines contractor to provide services to the Airline. It's past time for American to stop fighting common sense solutions to improve safety and efficiency and support the workers, passengers, and communities that make their success possible. Working at an airport – a key economic driver for states and regions – should mean workers are valued and respected, not sentenced to poverty and poor working conditions. Better pay and working conditions will not only improve these workers' lives, but are also critical to creating a well-trained, stable workforce that can ensure public safety and security at the airport.¹³ In addition, wage increases improve passenger experience and stimulate economic growth.¹⁴

That is why we are calling on city council members and airport officials in Charlotte, Dallas and Fort Worth, and Phoenix to implement the following measures:

- Establish family-sustaining wage standards for all workers at our airport to stabilize the workforce and make airports safer, more secure, and more accessible for passengers while improving the lives of this vital workforce.
- Increase overall transparency with respect to aviation lease agreements and airport/airline development deals to ensure tax dollars are being used to keep our communities safe, secure, and thriving, instead of prioritizing airline profits.

Investing in airport service workers through fair wages and improved working conditions benefits not only the workers, but also the industry as a whole, leading to increased safety, passenger satisfaction, and economic growth. It also delivers on the promise of public money serving the public good.



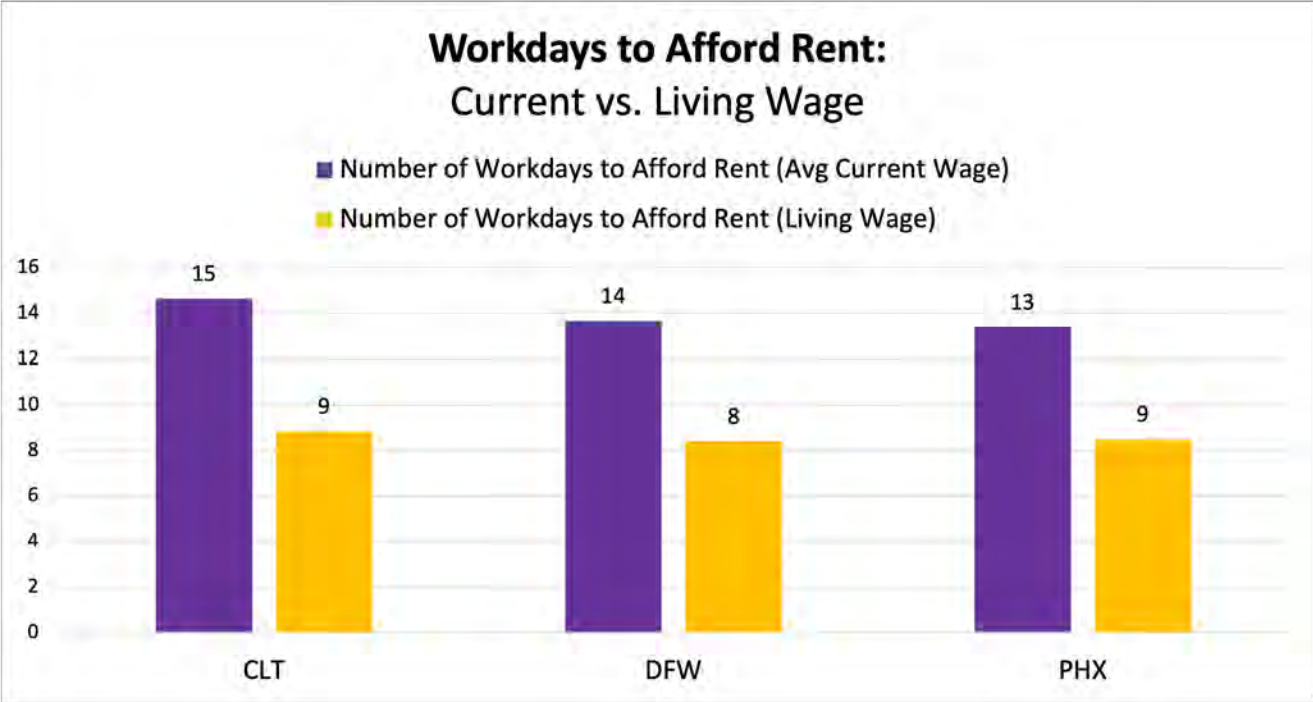


The Race to the Bottom in the Sunbelt¹⁵

American currently has half of its hubs in the South and Southwest, including in Phoenix, Charlotte, and Dallas-Fort Worth, where it can benefit from low wages, corporate subsidies, and less regulation to increase its profits. Of the three largest carriers, American has the most sunbelt hubs, which make up a larger share of its network than Delta and United.¹⁶ According to Robert Isom, American’s CEO, the majority of American’s growth from July 2023 to July 2024 was in Charlotte and Dallas-Fort Worth.¹⁷ In 2023, Phoenix and Charlotte had the second and fourth cheapest Cost Per Enplanement (CPE) for large hub airports,¹⁸ and Dallas-Fort Worth – the second busiest airport in the U.S.¹⁹ – had a rate that fell below average.²⁰

And while housing affordability used to be a major feature of the sunbelt, housing prices have exploded in the last two decades, causing the region to lead the country in severely cost-burdened households and eviction and foreclosure rates.²¹ Low wages combined with ballooning housing costs mean workers are living paycheck to paycheck, and many surveyed by SEIU report being homeless.

American has actively fought workers’ efforts to raise wages at its hubs by lobbying against living wage measures and supporting state laws that would preempt local wage and benefit standards. American lobbied multiple times from 2016 to 2021 to amend or oppose minimum and living wage bills in Philadelphia, spending over \$85,000.²² In 2021 when the Philadelphia City Council passed a prevailing wage law that raised airport workers’ wages to \$15.06 per hour and required contractors to provide quality health insurance benefits,²³ American lobbied against the bill, writing in a letter to City Council that the proposed raises were “too much, too fast.”²⁴ A representative from American also accompanied an Airlines for America (A4A) lobbyist in 2023 who testified in support of TX HB 2127,²⁵ a measure to permit state preemption of local standards, including labor and employment standards.²⁶



The trade association A4A, of which American is a member, has also lobbied and litigated extensively regarding airport worker pay and benefits, including against requirements that San Francisco airport workers be provided with health insurance benefits,²⁷ as well living wage policies covering workers at LAX,²⁸ the Minneapolis-St. Paul airport,²⁹ and Chicago- and D.C.-area airports.³⁰

However, it was not considered “too much, too fast” when American, Delta, United, and Southwest’s CEOs received, on average, two-fold pay increases after the expiration of CARES Act funding restrictions on CEO compensation.³¹ American’s CEO pay increase surpassed the others’ by leaps and bounds: American’s CEO received a nearly threefold pay increase to \$31.4 million in 2023.³² That also represents a 714% increase since 2000 in American CEOs’ compensation in real dollars.³³

In spite of American’s and others’ similar efforts, city councils and airport authorities across the country have established standards to help stabilize the workforce, including at 13 of the 20 busiest airports. As a result, almost 200,000 or 47% of all airport service workers in the U.S. enjoy the benefits of wage standards.³⁴ That number would likely be higher if not for American’s endeavors.

Southern and southwestern states have been at the epicenter of record-breaking heat waves recently,³⁵ where airport service workers at CLT, DFW, and PHX report working in extremely hot environments – inside aircraft cabins and jet bridges, on the tarmac, and in warehouses – without the airlines or their service providers ensuring that adequate safety measures are in place.³⁶ Many workers have experienced heat-related illnesses because employers have not provided adequate water or rest breaks.³⁷ Low pay and lack of health care coverage mean workers also often cannot afford air conditioning at home, and may not be able to see a doctor or afford to take a day off to recuperate.³⁸

The aviation industry is a significant contributor to global climate change,³⁹ the effects of which present major financial risks to airlines. According to American’s own reports, these risks include damage to its brand image, market changes in response to environmental shifts, long-term infrastructure challenges that could necessitate airport relocations due to rising sea levels, and the negative effects of extreme heat on worker safety and productivity.⁴⁰ Yet American and the trade associations Airlines for America, of which American is a member, and the International Air Transportation Association (IATA), for which American’s CEO Robert Isom serves on the Board of Directors and Board of Governors,⁴¹ have lobbied against environmental regulations that would reduce aviation emissions.

Domestically, A4A has opposed multiple jet fuel tax bills in New Jersey, including efforts to use such tax bills to fund expansions of public transportation.⁴² Similarly, American lobbied against a 2016 New Jersey jet fuel tax bill, with Rhett D. Workman, Managing Director of Government and Airport Affairs, stating in a letter to a New Jersey state senator that the tax would “put New Jersey at a serious competitive disadvantage in trying to expand air service.”⁴³



Timothy Lowe II has been working as a wheelchair attendant at the Charlotte airport for over a year (as of January 2025). He makes \$12.50 an hour plus around \$60 a day in tips. He ends up making about \$800 every two weeks and about \$300 of that is deducted from his checks for child support. Timothy couldn’t afford rent and needed to move out of his apartment. But every rental application he submitted

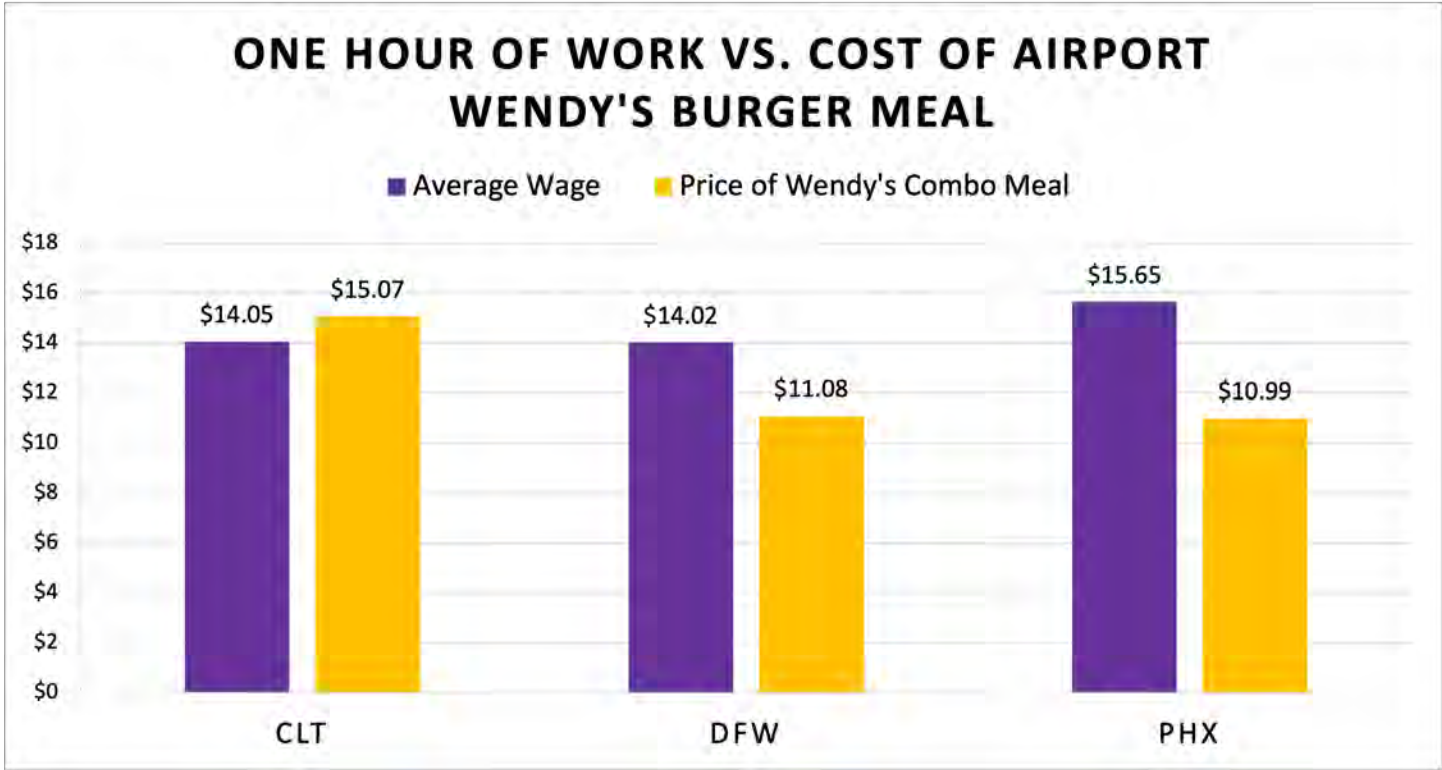
was denied, even though he had to pay expensive application fees just to apply. Timothy had to live in a storage unit for a few months until he found a local organization that would work with him and provided him with a low-cost place to live temporarily. The place he currently lives in is a four-bedroom house with two people living in each room. It gives him a chance to save money, but he does not like living there.



And abroad in 2020, A4A spent between 300,000€ to 399,999€ on lobbying in the European Union (EU)⁴⁴ to advocate against EU mandates on sustainable aviation fuels (SAF).⁴⁵ Then in 2021, A4A argued that SAF mandates should not be applied to non-EU carriers' international flights.⁴⁶ IATA has also opposed key aviation climate policies abroad, "including the full inclusion of aviation in the EU Emissions Trading System, kerosene fuel taxes, and ticket taxes on flights."⁴⁷

American's concentrated share of traffic at all of its hubs puts it in position to benefit from tax subsidies and other economic benefits in the name of development. However, tax incentives, subsidies, and other economic development benefits often have at least as many downsides as advantages.⁴⁸ These giveaways can lack transparency and community buy-in, despite involving huge sums of public money and serious impacts for local residents. For instance, in Charlotte, the airport's plan to acquire and demolish residential land to accommodate increased noise and make way for the airport's expansion has the potential to worsen the city's current housing shortage. The airport can lease the land it purchases to businesses who are allowed to operate in the airport's "noise zone" areas.⁴⁹ These expansion projects mainly benefit American because the airline operates the vast majority of flights going in and out of Charlotte.⁵⁰

By concentrating half its hubs in the South and Southwest, including Phoenix, Charlotte, and Dallas-Fort Worth, American Airlines capitalizes on low wages, economic subsidies, and less stringent regulations to maximize its profits. But workers, passengers, and local communities are paying the price, facing poverty, displacement, rising costs, climate change, and poor industry performance. The long-term consequences of this approach illustrate the pressing need for a more equitable and transparent model of airport development and investment, one that prioritizes community well-being and sustainable practices over profits.



Airport Service Workers Are Worth More

Hundreds of thousands of airport service workers across the country do work that is critically important to the operations of the air travel industry,⁵¹ but a significant proportion of them make poverty wages and work in unsafe conditions. That is true for American's CLT, DFW and PHX hubs, where airport service workers are paid less than a livable wage,⁵² experience financial distress, and toil in blistering heat (which in some circumstances might even put their lives at risk).⁵³ American has the power to ensure that all airport workers, who provide essential safety and accessibility services, are paid a living wage and work in safe conditions. Instead, the airline and its service providers actively fight workers' efforts to raise standards in order to drive down wages and costs.

In 2024, SEIU gathered in-depth surveys from Charlotte, Phoenix, and Dallas-Fort Worth airport workers employed by airline service providers which primarily service American Airlines. The startling results show that many airport service workers at these airports experience abject poverty, including homelessness and hunger, not to mention lack of health insurance coverage and paid time off. It is unconscionable that workers so integral to our transportation system are forced to endure these conditions.

They are not alone: real wages for workers in the airport service industry fell by 4.74% between 2003 and 2023.⁵⁴ Yet American Airlines reported record revenue in 2024 of \$54.2 billion, and paid its CEO Robert Isom \$31.4 million in 2023.⁵⁵ Poverty wages, lack of benefits, and poor working conditions create a crisis for the working people that service American, driving high turnover at the airline's hubs. At Charlotte, 81% of surveyed workers reported being hired since 2022; at Phoenix, 84%; and at Dallas-Fort Worth, 69%.⁵⁶ Passengers in turn pay the price, as rapid turnover not only makes airports less safe and secure, but also leads to worse service outcomes because workers aren't able to develop expertise.

Poverty Wages and Rising Rents

Across the country, airport service workers toil for low wages, despite providing essential services that help connect cities across the country and the world. A 2025 report by the Center for American Progress found that wages in airport service occupations were below the private sector median of \$22.48 per hour and that only 3 in 10 workers in some airport service occupations, like aircraft cleaners and passenger attendants, received employer-provided health insurance.⁵⁷

It is unsurprising that airport workers are behind their private sector peers: airlines have fought to drive wages down over the past two decades. Comparing a weighted average wage of both in-house and outsourced workers in the air transportation industry and adjusting for inflation, industry-wide wages declined 4.2% between 2003 and 2023, and skycaps, cabin cleaners, and cargo agents have seen their real wages decline:⁵⁸

Janitors' hourly wages increased by only \$2.11, an increase of 13%;

Skycaps' hourly wages fell by \$7.19, a decline of 28%;

Cabin cleaners' hourly wages fell by \$0.88, a decline of 4.56%;

Ramp agents and baggage handlers' wages increased by \$2.75, an increase of 16%;

Cargo agents' wages fell by \$2.91, a decrease of 13%; and

Passenger service agents' (wheelchair agents) increased by .39 cents or 1.72%.

Our survey of airport service workers servicing American Airlines at Dallas-Fort Worth, Charlotte, and Phoenix during the summer and fall of 2024 shows how airlines are driving down wages and exploiting workers in the South.⁵⁹ For many, wages are far below what's needed to afford basic housing. At DFW, workers reported wages that averaged between \$13.40 and \$14.83 per hour, while a one-bedroom apartment requires an hourly wage of over \$28 in the Fort Worth-Arlington metro area and \$30.88 in the Dallas metro area.⁶⁰ In Charlotte, wheelchair attendants reported earning as little as \$12.50 an hour, far short of the \$34.31 needed to cover a modest apartment.⁶¹ Averaging between \$14.35 and \$16.50 an hour, employers pay Phoenix airport workers significantly less than the \$32.29 required to live comfortably in Phoenix.⁶² The lack of a living wage, coupled with soaring rental costs – nearly doubling in some areas since 2019⁶³ – leave many workers struggling to afford basic necessities like food and utilities, with some even experiencing homelessness.

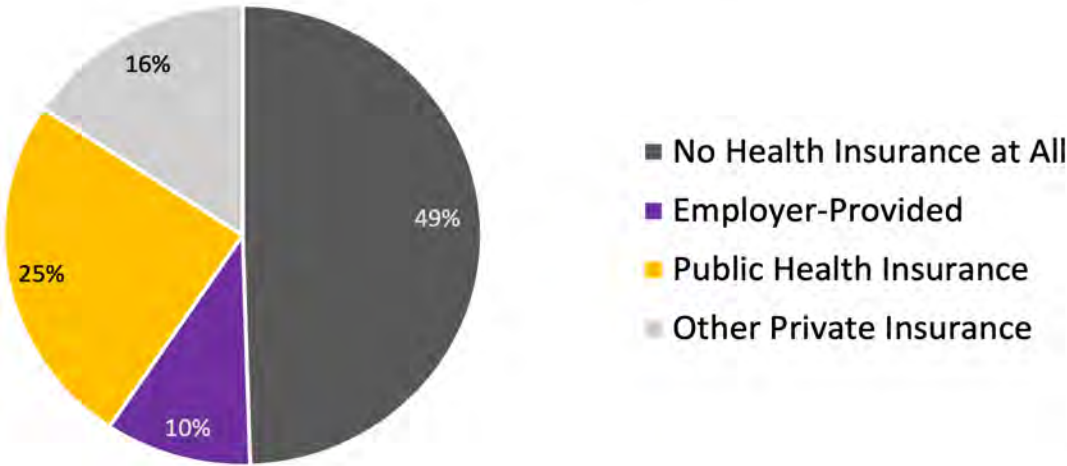
These low wages combined with a high cost of housing have caused airport service workers enormous financial hardship. Across the three cities, significant percentages of workers reported struggling to afford basic necessities, including running out of money for food (44% in Charlotte, 67% in DFW, 44% in Phoenix), being unable to afford medications (42% in DFW, 24% in Charlotte, 22% in Phoenix), fearing housing loss (31% in DFW, 40% in Charlotte, 24% in Phoenix), and experiencing homelessness (19% in DFW, 40% in Charlotte, 16% in Phoenix). In DFW, a staggering 89% of workers lacked paid sick leave. Some workers have even reported sleeping on airport grounds at some point.⁶⁴

Unsafe Working Conditions

While many airport service workers earn substandard wages, many are also risking their lives and health working at the airport. Within the last few years, several workers have been killed in accidents on the tarmac at U.S. airports. These include a maintenance worker at ORD who was crushed by machinery,⁶⁵ a ramp worker at MGM being ingested into a plane engine in 2022,⁶⁶ a baggage handler at MSY after their hair got caught in machinery in 2022,⁶⁷ and two separate incidents of vehicle accidents at AUS in 2023.⁶⁸ Another ramp worker at SAT allegedly committed suicide when they were ingested into a plane engine in 2023,⁶⁹ two maintenance workers died at an ATL workshop in 2024,⁷⁰ and most recently, a ramp worker at CLT perished after being run over by a vehicle in January 2025.⁷¹ It is worth noting that four out of nine of these deaths happened to people who worked for American Airlines or one of their subsidiaries.⁷²

From natural disasters to active shooters, service workers inside the terminal also have a role to play in assisting passengers during emergencies. During the 2013 shooting at LAX, a brave wheelchair attendant was

Sources of Health Insurance for Airport Service Workers at DFW, CLT, and PHX



among the first to encounter the shooter and assisted police in quickly finding and apprehending the killer.⁷³ A recent shooting at Phoenix Sky Harbor that took place in an area where retail, wheelchair, and janitorial workers work shows how ever-present emergency situations can be.⁷⁴ Yet wheelchair attendants at Sky Harbor, who might need to protect a passenger in a case like the recent shooting, make only the minimum wage, \$14.70 an hour, plus tips.⁷⁵ Many airport workers have reported they have never received any kind of emergency preparedness training,⁷⁶ and high turnover means workers may not have the familiarity and knowledge to provide effective assistance in an emergency.⁷⁷

Heat

The dangers of the job are especially pronounced in extreme heat, particularly in the sunbelt. Airport service workers face challenges like high temperatures inside airplane cabins, on jet bridges, and on the tarmac.⁷⁸ They are also expected to work at a backbreaking speed while cleaning and securing planes or transporting passengers to their flights, which may also prevent them from easily accessing adequate water and rest breaks during the workday.⁷⁹ Airlines' neglecting or refusing to turn on A/C in airline-controlled areas such as jet bridges and aircraft cabins, combined with failing to provide sufficient water and rest breaks,⁸⁰ significantly contributes to the hazardous conditions these workers face.

The aviation industry is a significant contributor to global climate change, contributing 3.5% of all drivers of climate change from human activities,⁸¹ which in turn results in temperature increases and extreme weather events that can be dangerous for workers. Sunbelt states, particularly counties with large, vulnerable populations, will face significantly greater risks from wildfires, droughts, and extreme heat as the region's climate warms in the coming decades.⁸² Yet American and the trade associations to which it belongs, A4A and IATA, have lobbied against environmental regulations that would reduce aviation's contribution to global carbon emissions.⁸³

At Charlotte, DFW, and Phoenix Sky Harbor airports, many airport service workers face dangerous heat-related safety issues in the spring, summer, and fall months. Workers in all three cities have described similar struggles: limited water supplies (sometimes forcing workers to purchase it themselves), lack of breaks, and inadequate cooling in areas like jet bridges and aircraft cabins.⁸⁴ These conditions have led to heat exhaustion, fainting, and heat stroke.⁸⁵ Despite worker advocacy, including rallies, petitions, and complaints to OSHA and city councils, improvements have been slow and inconsistent. Workers continue to report a lack of water, heat illness, and even retaliation for speaking out about these hazardous conditions.⁸⁶

Low wages also mean airport service workers may not be able to afford to cool their homes or miss a day of work to recover from heat exhaustion without significant economic risk. On top of that, many airport workers are denied paid sick days and affordable healthcare.⁸⁷ Survey responses show that these workers are struggling to pay for utilities, including 52% in Charlotte, 69% at DFW, and 54% in Phoenix.⁸⁸ Workers are also chronically underinsured, with 61% at DFW, 54% at CLT, and 33% at PHX lacking any health insurance coverage.⁸⁹ The small number of workers covered by employer-provided health insurance illustrates the lack of affordability across the board: just 10% at DFW, 9% at CLT, and 11% at PHX report being covered by employer health insurance.⁹⁰

Low wages and lack of workplace protections mean airport service workers are especially afraid of being fired or retaliated against for asking for basic safety measures. Joy, a baggage services agent at DFW, said, "Some workers report being too afraid to even take a short break when they feel the signs of heat illness because they



Travun Watts, a cabin cleaner at DFW Airport, fainted in scorching heat while waiting in a jet bridge and woke up in a Dallas hospital, unsure of how he got there. Despite his diabetes, he returned to grueling work conditions, often cleaning up to 14 planes per shift with little time to manage his health. "Airlines are bragging about the billions they raked in this year. They're making billions off of my labor while I'm in a hospital bed because I can't afford the medicine I take every single day to survive."

are afraid to be disciplined.”⁹¹ And at Phoenix Sky Harbor, four workers – including Cecilia Ortiz, a worker representative on the city council’s recently-created heat safety advisory committee – were fired less than a month after participating in workplace actions calling on their employers to implement heat safety measures. These workers allege they were retaliated against for this and other protected advocacy, and have charges pending at the National Labor Relations Board.⁹²

“We have to navigate some extreme conditions. Heat, especially in the south, can be hard to deal with. The jet bridges are some of the hottest places we have to work. At times, we have to be on the jet bridges for 20 minutes or more. Sometimes when I get off the jet bridge I am covered in sweat.” – Anthony “Tony” Caldwell⁹³

Phoenix: The summer of 2024 was also Phoenix’s hottest summer ever recorded,⁹⁵ and the summer prior, the city had a record-breaking 31-day streak of highs at or above 110 degrees Fahrenheit.⁹⁶ Linda Ressler, who cleaned airplane cabins at Sky Harbor during overnight shifts, detailed air conditioning systems being switched off by airline personnel, even though nighttime temperatures regularly approached 100°F.⁹⁷ According to Ressler, despite the extreme heat, workers were “told explicitly we can’t bring water on the planes with us.” Ressler said, “I sometimes resort to drinking water left over from the passengers. It’s grueling work, and we often have so many airplanes scheduled to clean, we aren’t able to take breaks.”⁹⁸ She lost consciousness briefly in July 2023 during her shift due to the heat, but was not given medical assistance and went to the hospital after her shift was over.



Even though airport workers successfully campaigned to pass a Phoenix city council heat protection ordinance in March 2024, survey responses show that conditions are still dire: half a year later, 44% said they had gotten sick or dizzy from working in the heat in the airport, yet 80% said they had not been trained on the job on how to recognize, prevent, and treat heat illness.⁹⁹ And in July 2024, the airport discovered legionella and elevated copper levels in airport water fountains, which airport service workers rely on for hydration.¹⁰⁰ While the Phoenix Aviation Department’s heat safety plan does a good job detailing minimum heat safety standards like access to water, shade, rest, acclimatization, and training, it does not outline enforcement procedures, whistleblower protections, or consequences for airlines, contractors, or personnel who violate the plan.¹⁰¹

Dallas - Fort Worth: In the summer of 2023, a DFW cabin cleaner addressed Airport Board Members, urging improvements in working conditions and facilities to combat heat-related challenges.¹⁰² In August 2024, airport service workers at DFW rallied outside of American Airlines Headquarters at Fort Worth and attempted to deliver a letter to the CEO Robert Isom. Despite workers calling for the airline to address the heat issues, none of the executives came to meet them, and no one accepted the letter.¹⁰³

Charlotte: During the summer of 2024, both wheelchair attendants and cabin cleaners at CLT advocated for themselves and their coworkers to have better protections from heat and regular water access. In August, the cabin cleaners rallied outside of the terminal lobby at CLT demanding that American Airlines do better at protecting workers during the hot summer months by ensuring that there is enough water for everybody to stay hydrated.¹⁰⁴ By October workers were fed up with not having enough water to stay safe, and delivered petitions to their managers demanding increased access to clean drinking water.¹⁰⁵

No worker should have to fear for their life, or risk their health, on account of extreme heat on the job. Staying safe in extreme heat is simple: cool water, a cool place to take breaks as needed, and training to understand the signs of heat exhaustion. Yet, airport workers are too often at risk because airlines and their service providers don’t have these basic safety measures in place. Airlines and their service providers have a responsibility to every single worker who helps make travel possible – no matter who signs their paycheck – to prevent health and safety hazards.

Passengers Pay the Price for the Bald Pursuit of Profits

It's not surprising that service suffers when service workers suffer. Low wages and poor working conditions correlate to poor job performance and make accidents more likely.¹⁰⁶ Better pay and working conditions are essential to creating a well-trained, stable workforce that can ensure public safety and security at the airport.¹⁰⁷

Passengers should be able to rely on a well-staffed, trained, and experienced workforce, for ease of travel and for their safety, security, and accessibility. But American Airlines, the dominant airline at CLT, DFW, and PHX, does not provide that experience. In rankings from the 2023 Air Travel Consumer Report, the most recent full-year report, American Airlines stood out as being the worst or near the worst, in a number of passenger service categories:

- **Mishandled Baggage, worst (15th); AAL mishandled baggage at a rate over 40% higher than average.**¹¹⁰
- **Mishandled Wheelchairs and Scooters, 12th out of 15; AAL subsidiary PSA took 14th. American Airlines mishandled 1.8% of all scooters brought on board.**¹¹¹
- **Involuntary Denied Boardings (aka "Bumpings"):** The American Airlines Network (including branded code share partners) ranked 9th out of 10 for bumpings by rate, and the last for total bumped passengers. The AA network was responsible for bumping more than 10,000 people, or 1 in 1.79 bumpings in 2023. By comparison, the United Airlines network bumped 357 people and the Delta Air Lines network bumped a total of 3.¹¹²
- **On Time Arrivals: American Airlines ranked 10th out of 15.**¹¹³

Airport service workers are responsible for providing services legally mandated under the Air Carrier Access Act to passengers with disabilities, both those who require wheelchairs and those who travel with their own assistive equipment.¹¹² They help passengers with disabilities safely navigate through an airport using wheel-

**Billions of tax dollars are invested in the national air travel system.
Our public money must serve the public good.**



\$13 Billion

in tax dollars go to airlines and the U.S. commercial aviation industry every year.



\$25 Billion

for airport and traffic control projects that airlines rely on included in the Bipartisan Infrastructure Law of 2021 over 5 years



\$1 Trillion

is the estimated worth of our nation's aviation infrastructure, built primarily with federal grants.



\$54 Billion

taken by major U.S. airlines in COVID funding

chairs or carts, while providing vital boarding, deplaning, and connecting assistance. They may help physically transfer passengers from their wheelchairs into aisle chairs and then into airplane seats, a procedure that often can be dangerous for passengers with disabilities if not performed correctly. And in a safety or security emergency, service workers are often the ‘first’ first-responders to evacuate elderly and disabled passengers, lead them to places of safety, and provide support, comfort, and information.

The public record suggests that airlines have not provided passengers with disabilities with the services they are entitled to under federal law, by failing to create a stable and professional passenger services and cargo-handling workforce capable of delivering these services. In 2021, the U.S. Government Accountability Office identified the following significant problems as factors affecting services for passengers with disabilities: not enough personnel to serve all passengers well; and employee turnover, exacerbated by seasonality, low wages and limited benefits (such as no or limited sick leave or health insurance coverage), and the physical demands of assisting passengers.¹¹³ The GAO’s findings dovetail with those reported by passengers themselves. According to a survey by the Paralyzed Veterans of America and 11 other disability organizations,¹¹⁴

- **16% have been dropped, and 23% injured or hurt during aisle chair transfers;**
- **60% experienced damage to their wheelchair, and 28% had an accessory lost; and**
- **56% had delays in returning their wheelchair.**
- **These experiences were significant enough that more than half the respondents said they avoid flying because of personal safety during transfers, and nearly three-fourths avoid flying because of potential damage to their wheelchair.¹¹⁵**

Passengers Pay a high Price for Airline Wrongdoing

American Airlines has been one of the worst offenders in poor treatment of passengers with disabilities. In October 2024, the Department of Transportation issued a landmark \$50 million penalty against American for “numerous serious violations” of the laws protecting airline passengers with disabilities between 2019 and 2023.¹¹⁶ Based on an investigation into American, the DOT found “cases of unsafe physical assistance that at times resulted in injuries and undignified treatment of wheelchair users, in addition to repeated failures to provide prompt wheelchair assistance. American also mishandled thousands of wheelchairs by damaging them or delaying their return, causing it and its subsidiaries to rank among the worst for mishandled wheelchairs and scooters,¹¹⁷ leaving travelers without the device they need for mobility.”¹¹⁸

Passengers with disabilities who require wheelchair assistance while traveling through CLT on American Airlines flights also face safety concerns. A survey of wheelchair attendants that assist American Airlines passengers at CLT found that most of the attendants don’t believe their employer has trained them adequately.¹¹⁹ Furthermore, many of the wheelchair attendants also reported that they often have to push two wheelchairs at the same time and that they do not have enough time or staff to do their jobs properly.¹²⁰ These revelations are concerning for the safety of passengers with disabilities because rushed, injured, or under-trained workers could result in the passenger becoming seriously injured during aircraft transfers.

Passengers Pay More, Airlines Contribute Less

Though dealing with poor service and lack of accessibility, passengers are increasingly contributing to airport operations and potentially bolstering airlines’ bottom line when they dine, shop, park, or rent a car at the airport. At DFW, airlines get a percentage of all airport revenue from parking, ground transportation, concessions, rental cars, and commercial development, once revenue exceeds a \$60 million threshold.¹²¹ And at CLT, airlines get 40% of revenue from various airport businesses, including money spent by passengers, after the airport has taken its share for debt service and operating expenses.¹²² And in Phoenix, airlines have seen their fees and proportional contribution to the airport’s operating budget fall while passengers pay an increasing

share of the fees.¹²³ American has been a major beneficiary of these arrangements due to its outsized share of passenger traffic at these three airports.

Airports establish contractual relationships with airlines by entering into lease and use agreements, which set the rules for airlines' use of airport property, how the airport's operating costs will be recouped, and how non-airline revenues are distributed or shared.¹²⁴ Typically, airports and airlines negotiate lease agreements behind closed doors without input from the public (see Section V below). Airlines have an interest in keeping their costs low, and to keep the airlines in place, airports have looked for ways to collect more revenue from passengers,¹²⁵ in some cases even passing some of that money back to the airlines.¹²⁶

Since 2011, DFW has used passenger parking and concessions fees to minimize airport landing fees that airlines pay to the DFW airport,¹²⁷ with the majority (over 80 percent) of funds benefiting American Airlines in particular.¹²⁸ DFW has used over 75% of net revenue from passenger parking, concessions, and other non-airline fees – totaling \$579 million over 11 years – to subsidize airline costs, increasing these allocations by 993% since 2011.¹²⁹

For its part, the airline lease agreement at CLT contains a lucrative revenue sharing agreement, which allows signatory airlines to take a portion of the profits CLT makes from other companies operating at the airport.¹³⁰ In 2024 alone, the signatory airlines and their affiliates received \$65.2 million through the agreement, overwhelmingly benefiting American Airlines, the largest airline operator at the airport.¹³¹ Each year, this revenue sharing agreement provides major airlines and their affiliates with 40% of the net remaining airport terminal revenue.¹³² This includes revenue from concessions, parking, mobile ordering services, and other costs that passengers fund.¹³³

Through this agreement, every year CLT loses tens of millions of dollars of revenue to airline profits, when that revenue could have been reinvested in the local economy, airport infrastructure, and the airport workforce. Instead, that loss of airport revenue forces the airport to drive up prices for passengers to make up the difference. For instance, while airlines are paying almost 40% more in landing fees than they were in 2019,¹³⁴ passengers are paying more than 50% more in parking as of 2023.¹³⁵ Between 2022 and 2024, the airport raised parking costs for Charlotteans who park at the airport,¹³⁶ expanded revenue sources eligible for debt payments while protecting the streams of revenue American gets a share of,¹³⁷ and used taxpayer dollars to finance many of the capacity enhancement projects that will overwhelmingly benefit American Airlines.¹³⁸

Despite the airport charging airlines the second lowest fees and charges for airlines per enplaned passenger in the country,¹³⁹ ticket prices for flights out of CLT are the fourth highest in the country as of August 2023.¹⁴⁰ As AxiosCharlotte reported in January 2024, "Charlotte-Douglas is notorious for its expensive flights because American Airlines operates as a near-monopoly here."¹⁴¹ So while passenger prices including air fare go up, airlines like American are not improving customer service or increasing their contributions to the airport.

While PHX does not engage in revenue sharing, over time it has let airlines off the hook for millions of dollars. Under the PHX compensatory rate-setting policy, the airport has the right to adjust rates and charges at its own discretion, as long as the airport's CPE falls below the median CPE of large hub airports.¹⁴² But staff first consult with airlines privately before setting rates/fees.¹⁴³ A review of the airport's operating revenue shows that American and other airlines at PHX are contributing significantly less to the airport's operating budget than passenger-generated funds, and are paying proportionally less than they did in 2019,¹⁴⁴ despite receiving significant pandemic aid¹⁴⁵ and recovering fully since the pandemic.¹⁴⁶ In 2024, revenue from passenger-generated business at the airport represented almost 62% of total operating revenue, whereas revenue from passenger airlines provided only about a third.¹⁴⁷ The largest share of passenger revenue in the operating budget comes from parking and ground transportation, which in 2024 made up a larger share of the operating budget than it did in 2019.¹⁴⁸

This distribution of operating revenue is problematic in part because non-aeronautical passenger spending follows – rather than drives – airline passenger traffic, evidenced by the fact that in 2024, J.D. Power reported that, while passenger traffic was still soaring, in-terminal spending fell significantly compared to 2023.¹⁴⁹ Regardless of how many passengers travel through the airport, the airport still has expenses to cover by virtue of remaining open for business. Airline tenants should be responsible for covering the cost of that access, even if they are not fully utilizing their share of it.

Public Funds Should Serve the Public Good

Airports are publicly-owned, publicly-funded infrastructure vital to the health of our local communities. And while that public investment should serve the public good, both airports and airlines sometimes fail to ensure that airports are sources of good wages and benefits. Additionally, airports and airlines sometimes pursue their interests without proper regard for their impact on the surrounding community.

The U.S. commercial aviation industry receives an estimated \$13 billion in ongoing subsidies each year from a variety of sources, many of which help pay for airport infrastructure costs.¹⁵⁰ The original physical infrastructure that airlines rely on to this day, which comprises an estimated \$1 trillion investment in airports, air traffic control, and other fundamentals of the industry,¹⁵¹ was built primarily with federal funds.¹⁵² Additionally, the Bipartisan Infrastructure Law (BIL) of 2021 funded \$25 billion over 5 years for airport and traffic control projects that airlines rely on.¹⁵³ The FAA estimates that, through 2027, approximately \$62.4 billion in airport development projects will be considered eligible for AIP or BIL funding, including \$20 billion for large hubs.¹⁵⁴ On top of ongoing public support for the air travel industry, to address the COVID-19 pandemic's impact on air travel, the industry received an historic bailout. The federal government allocated \$54 billion to airlines and \$5 billion to air transportation contractors through the CARES Act Payroll Support Program to cover airline and contractor payrolls.¹⁵⁵ Airlines also benefited from CARES Act payments for airports.¹⁵⁶

As detailed below, Charlotte, Dallas-Fort Worth, and Phoenix airports plan to invest a combined \$18.8 billion in airport expansion projects that will help meet demand forecasts.¹⁵⁷ Given that American makes up the vast majority or the plurality of passenger traffic at these airports, the airline is positioned to benefit greatly. Yet, in all, the expansion projects have been undertaken with insufficient regard for displaced homeowners, negative impacts on housing prices or availability generally, and/or with too little transparency or opportunity for public input. Public investment in airports is important, but that investment should benefit workers and communities, not just serve to increase airline profits. City and airport officials need to ensure that capital planning and investment are transparent and foster worker and community thriving.

DFW is a good example of how lease agreement negotiations between airlines and airports, which can have huge monetary incentives for airlines as well as negative consequences for passengers, workers, and residents, routinely lack transparency. In May 2023 the airline lease agreement process at DFW, which upon information and belief included negotiations pertaining to the airports' expansion plans, took place during a closed session at the monthly DFW Board meeting. Since it was a closed session, topics of the negotiation are not released on an agenda beforehand, and no meeting minutes on the negotiation are shared with the public afterward.¹⁵⁸ In 2024, the airport began work on its nearly \$9 billion capital improvement plan, marking the airport's largest capital investment since it opened in 1974.¹⁵⁹ The airport continues to secure government subsidies for expansion projects, such as a \$15 million grant for Terminal F, which features a 15-gate concourse explicitly designed to accommodate American Airlines' operational growth.¹⁶⁰

To accommodate American Airlines' growth in Charlotte, the airport has invested \$4 billion in a massive airport expansion project.¹⁶¹ The expansion includes improvements and gate expansions within the terminal building, as well as a new 10,000-foot runway to boost capacity by up to 30%.¹⁶² The expansion plan also includes various industrial and hospitality districts surrounding the airport¹⁶³ to generate more revenue for the airport



Nicole Ray is a Passenger Service Agent at Sky Harbor International Airport. She is paid minimum wage plus tips, but her employer deducts the tips from the wages they pay her, forcing her to only make the minimum wage. She supports her two sons and worries her rent will increase with upcoming apartment renewal which could be difficult to afford. She also worries about affording the increased electric costs associated with running the air conditioning during the brutal heat in the summer time. "While the major airlines rack in record revenue, many of us are paid poverty level wages and put our health on the line for our jobs. In Phoenix, we've had to fight for access to water and protections from the extreme heat that gets worse each summer. We are the backbone of air travel and our jobs should be good, union jobs that pay living wages and protect us from hazardous conditions to ensure that we can get home to our families at the end of the day."

from non-aviation sources. In order to make way for more flights and commercial development around the airport, the airport has opted into an “FAA Part 150 Noise Compatibility” process.¹⁶⁴ In turn, the airport can access federal funding for planning and mitigation measures.¹⁶⁵ The process does require some public engagement, but as explained below, the input avenues are far too limited, especially because the expansion process may cause new areas to be impacted by aircraft noise and deemed unsuitable for residential use,¹⁶⁶ thus exacerbating Charlotte’s housing shortage, which a recent University of North Carolina Charlotte report says is driving up prices and interest rates in Charlotte.¹⁶⁷

The Charlotte City Counsel provided only a cursory notification and opportunity for public input, leading some Charlotte city council members and residents to criticize what they characterized as a rushed process lacking public input.¹⁶⁸ For example, none of the study’s land use measures were presented publicly prior to the release of the final draft in August 2024.¹⁶⁹ The Airport Community Roundtable (ACR), which was set up by the airport to represent the community during the noise study process, was never fully staffed, with 14 out of the 25 allotted seats remaining vacant.¹⁷⁰ SEIU members asked airport officials and the ACR multiple times to provide information sessions about the Part 150 study during times and days of the week that would be more accessible for people who work weekdays and nights.¹⁷¹ However, the airport did not change their meeting times after receiving these requests.



Phoenix Sky Harbor’s long-term expansion and noise abatement program – which American Airlines has been a beneficiary of for many years – provides a cautionary tale for the development underway at Charlotte airport. Over the next twenty years, PHX plans to spend \$5.7 billion to meet projected passenger and cargo demand,¹⁷² which will provide American with more gates, greater international flight capacity, and faster connections to partner airlines.¹⁷³ As America West, American Airlines’s precursor airline, rapidly grew its business in the Phoenix area starting in the 1980s, it worked hand in hand with the airport to expand airport facilities.¹⁷⁴ With an expanded noise contour as a result of the airport’s expansion, starting in 1999, the airport was given permission to purchase 1,100 noise-affected properties and ultimately 782 property owners chose to sell their property to the City’s Aviation Department.¹⁷⁵ Like Charlotte, the airport has gotten approval from the FAA to sell or lease some of the land it acquired.

In addition to redlining and long-term disinvestment, airport expansion and highway construction in Phoenix segregated and displaced long standing Latino and Black communities near the airport.¹⁷⁶ In response, neighborhood community organizations fought highway-related demolitions and airport expansion and pushed the city to address increased noise and air pollution.¹⁷⁷ The city’s answer to these concerns since the 1970s has been to provide families assistance in relocating through voluntary noise acquisition programs, which have cleared out huge swaths of historic Latino and Black neighborhoods, failed to provide meaningful compensation for residents to relocate, and left remaining residents surrounded by blight.¹⁷⁸ In 2017, the Nuestro Barrio Neighborhood Association wrote to the city that the airport had failed to address community needs in the area for 15 years following the then-most-recent round of property purchases and demolitions: “Existing infrastructures needed immediate attention and improvements for remaining [residents] still living in the neighborhoods.”¹⁷⁹ For the last 25 years, the airport has failed to develop the noise parcels and the area still remains full of empty lots, which has likely led more residents to sell their homes in order to escape the blight, further eroding the community.¹⁸⁰

Major transit development projects also leave residents with lasting health effects of pollution, and future development plans could make it worse. A 2005 study produced by Arizona State University professors found that residents of this area continued to suffer severe health impacts decades later as a result of industrialization as well as vehicular and other pollutants stemming from highway development.¹⁸¹ The American Lung Association has ranked Phoenix as one of the worst major cities for air quality in the country, which is usually even worse for low-income and minority communities who often live near highways and airports.¹⁸² Like Charlotte, a large part of the noise land is slated for industrial development, including cargo and warehousing,¹⁸³ which could result in new noise and emissions impacts for surrounding residents.

Billions of dollars in public funding every year supports airport infrastructure and expansion costs. Development programs like the ones at DFW, CLT, and PHX have huge consequences for nearby communities, who can experience displacement, property devaluation, long-term health impacts, and loss of cultural resources. And while American Airlines stands to benefit enormously from these expansions, communities receive minimal input. To ensure that public funds serve the public interest and that affected communities have a meaningful voice in shaping their futures, greater accountability and transparency in airport development is needed.



Conclusion

The evidence is clear: The business model in American Airlines' sunbelt hubs prioritizes profits over people, creating a cascade of negative impacts that harm workers, passengers, and communities. While American Airlines CEO Robert Isom paid himself \$31.4 million in 2023 – the highest CEO-to-median-employee pay ratio among peers at 464-to-¹⁸⁴ – the airline does nothing to address subcontracted workers' poverty wages, dangerous working conditions, and housing insecurity.

The situation is particularly dire at American's southern hubs:

- **Workers in Charlotte, Dallas-Fort Worth, and Phoenix face wages far below living costs, with many reporting homelessness and food insecurity;**
- **Airport service workers routinely work in dangerous heat conditions without adequate protections, leading to heat-related illnesses and injuries;**
- **High turnover due to poor conditions compromises airport safety and security, including for passengers with disabilities;**
- **Communities bear the burden of airport expansions with minimal transparency or input.**

Despite receiving billions in public subsidies and benefiting from taxpayer-funded infrastructure, American Airlines continues to extract wealth from these public assets while providing substandard service. The airline leverages its dominant position at these hubs to secure favorable deals that shift costs to passengers while maintaining poverty wages for essential workers.

A number of studies show that low wages result in high turnover and lower performance, which leads to greater numbers of less trained and less experienced workers in the workplace.¹⁸⁵ In turn, workers are "less familiar with safety and security procedures, less able to anticipate and identify potential hazards, and more uncertain about where to take their complaints or how to report problems."¹⁸⁶ For example, a Port of Seattle six-month study in 2014 found that low wages were a major driver of high turnover at Seattle-Tacoma International Airport, which ranged from 25% to 80% per year across employers, and newer workers were 80% more likely to receive citations for security violations.¹⁸⁷

Over the last 25 years, 26 U.S. airports, including 13 of the 20 busiest airports, have established a number of labor standards.¹⁸⁸ Research has shown that these standards demonstrably improve safety and employee performance.¹⁸⁹ They also allow airline service provider companies to compete on quality and performance as opposed to cost alone.¹⁹⁰

In 2018 the Port Authority of New York and New Jersey cited concerns over "post-9/11 security imperatives; the need to operate safely in inclement weather; and high workforce turnover" in its Airport Minimum Wage Policy proposal.¹⁹¹ The Port Authority's resolution further stated that "[l]ifting airport-workers' wages is now a tried and tested tool, widely-used for responding to a recurring set of serious problems at airports around the United States."¹⁹² And in December 2024, the Port Authority's Board of Commissioners expanded the airport minimum wage by tying it to inflation,¹⁹³ noting "significant improvements in customer satisfaction following the minimum wage increases that began in 2018."¹⁹⁴

Increasing airport workers' wages would also lead to broader gains, including job creation, economic growth, and increased tax revenue. A 2017 Economic Roundtable report found that if all airport service workers earned \$15 an hour, the aggregate raise would create the equivalent of 22,512 new jobs, raise \$3.7 billion in added local sales, generate \$470 million in local, state, and federal taxes, reduce \$433 million in public assistance costs, and create over \$2 billion of new value in the economy.¹⁹⁵

The path forward requires city councils and airport authorities in Charlotte, Dallas-Fort Worth, and Phoenix to take action to rebalance the power dynamic with American Airlines and ensure that our public infrastructure serves all stakeholders – not just corporate profits. By ensuring that airport service workers are paid well and protected, airport authorities can create safer workplaces, better passenger experiences, and stronger communities while still maintaining efficient and world-class air service.



Endnotes

- 1 Survey data on file with SEIU.
- 2 Id.
- 3 See e.g., Ken Jacobs. "The key to safer airports? Better wages and working conditions," *The Hill*, September 2023. <https://thehill.com/opinion/congress-blog/4224421-the-key-to-safer-airports-better-wages-and-working-conditions/>
- 4 Amanda Gallear. "The Impact of Wages and Turnover on Security and Safety in Airports: A Review of the Literature," University of California Berkeley Center for Labor Research and Education, October 2017. <https://laborcenter.berkeley.edu/the-impact-of-wages-and-turnover-on-security-and-safety-in-airports/>
- 5 Ken Jacobs. *Labor standards and airport safety and security*, University of California Berkeley Center for Labor Research and Education, July 2023. <https://laborcenter.berkeley.edu/labor-standards-and-airport-safety-and-security/>
- 6 Id; see also Ray White. "Statement and Comments, Port Authority's Proposed Rules for Implementation of Minimum Wage Policy for Non-Trade Labor Service Contracts," July 2018. Page 34. https://aemdev.panynj.gov/content/dam/airports/index/wage-public-comments_081518.pdf
- 7 Ken Jacobs. "The key to safer airports? Better wages and working conditions," *supra* note 3.
- 8 Ted Reed. "Soaring travel demand, industry trends create golden times for Charlotte's airport," *Business North Carolina*, October 2024. <https://businessnc.com/soaring-travel-demand-and-favorable-industry-trends-have-created-golden-times-for-charlottes-airport-d-by-artificial-intelligence/>
- 9 "Fitch Rates Dallas-Ft Worth Airport, TX's Ser 2024 Joint Rev Ref Improv Bonds 'A+'; Outlook Stable," Fitch Ratings, August 2024. <https://www.fitchratings.com/research/infrastructure-project-finance/fitch-rates-dallas-ft-worth-airport-tx-ser-2024-joint-rev-ref-improv-bonds-a-outlook-stable-09-08-2024>
- 10 Brandon Brown. "Sky Harbor's passenger growth softens, latest data shows," *Phoenix Business Journal*, March 2025. <https://www.bizjournals.com/phoenix/news/2025/03/07/sky-harbor-passenger-growth-softens.html>
- 11 SEIU analysis of American's hub locations. American Airlines. "American Airlines Group." Accessed March 31, 2025. <https://www.aa.com/i18n/customer-service/about-us/american-airlines-group.jsp>
- 12 American carried 226 million passengers compared to Delta's more than 200 million customers served, United's 173 million, and Southwest's 179 million. American Airlines Group Inc. *Form 10-K*, February 2025. Page 8. <https://americanairlines.gcs-web.com/static-files/9fae85f6-eafd-4b11-ae37-5c302871a245>; Southwest Airlines Co. *Form 10-K*, February 2025. Page 69. <https://otp.tools.investis.com/clients/us/southwest/SEC/sec-show.aspx?FilingId=18167883&Cik=0000092380&Type=PDF&hasPdf=1>; United Airlines Holdings, Inc. *Form 10-K*, February 2025. Page 34. <https://ir.united.com/static-files/137d1550-984b-4f42-a6ae-82db5e856f95>; Delta Air Lines. "Delta Air Lines Announces December Quarter and Full Year 2024 Financial Results," January 2025. <https://ir.delta.com/news/news-details/2025/Delta-Air-Lines-Announces-December-Quarter-and-Full-Year-2024-Financial-Results/default.aspx>
- 13 Ken Jacobs. *Labor standards and airport safety and security*, *supra* note 5.
- 14 Id; Patrick Burns, Halili Toros, and Daniel Flaming. *Flying Right: Giving U.S. Airport Workers a Lift*, Economic Roundtable, June 2017. Page 54. <https://ssrn.com/abstract=2998224>; Lily Roberts and Ben Olinsky. "Raising the Minimum Wage Would Boost an Economic Recovery—and Reduce Taxpayer Subsidization of Low-Wage Work," Center for American Progress, January 2021. <https://www.americanprogress.org/article/raising-minimum-wage-boost-economic-recovery-reduce-taxpayer-subsidization-low-wage-work/>
- 15 The Editors of Encyclopaedia Britannica. "Sun Belt," *Encyclopedia Britannica*, January 2025.

- <https://www.britannica.com/place/Sun-Belt>
- 16 Based on SEIU analysis of American, Delta, United, Southwest, Alaska, and Jet Blue hubs located in sunbelt cities. Analysis on file with SEIU.
- 17 Ted Reed. "American Airlines Leads Sunbelt From Charlotte And Dallas, World's Largest Hub," *Forbes*, September 2024. <https://www.forbes.com/sites/tedreed/2024/09/01/american-airlines-leads-sunbelt-from-charlotte-and-dallas-worlds-largest-hub/>
- 18 CPE is a key metric in the aviation industry that is used to measure and compare airports' airline rates and charges. Federal Aviation Administration. "(CATS) Operating and Financial Line Item Report 127," Certification Activity Tracking System (CATS). Accessed March 10, 2025. https://cats.airports.faa.gov/Reports/Form127_Line_Item_Select.cfm. Data retrieved using the following parameters: Year: 2023; Hub Size: L; Line Item: Passenger Airline CPE. 2023 was the most recent available year where all but one airport submitted CPE data. George Bush Intercontinental Airport was not included in the analysis because it has not submitted CPE data since at least 2022.
- 19 SEIU analysis of Bureau of Transportation Statistics data on non-stop segment passengers transported from U.S. airports between January and November 2024 (most recent available data). U.S. Bureau of Transportation Statistics. "T-100 Domestic Segment (All Carriers)," Air Carrier Statistics (Form 41 Traffic) - All Carriers. Accessed March 9, 2025. https://www.transtats.bts.gov/Fields.asp?gnoyr_VQ=GEE. Most recent available data for 2024 does not include December 2024.
- 20 Federal Aviation Administration. "(CATS) Operating and Financial Line Item Report 127," *supra* note 18.
- 21 Shahrzad Habibi, Ananya Hariharan, and Tara Raghuveer. *Displaced in the Sun Belt*, New America, February 2021. <https://www.newamerica.org/future-land-housing/reports/displaced-sun-belt/introduction-why-the-sun-belt-and-why-now/>
- 22 SEIU analysis of American Airlines lobbying expenses. City of Philadelphia Board of Ethics. "Philadelphia Lobbying Information System." Accessed November 2021. <https://www.pliscloudapp.net/Public/wfSearch.aspx>. Data retrieved using the following search parameters: Firm Name: "American Airlines;" Action: "Expenses."
- 23 "Mayor Kenney Signs Councilmember Johnson's Philadelphia International Airport Prevailing Wage Bill That Will Help Workers Receive Living Wages and Quality Healthcare," Philadelphia City Council, September 2021. <https://phlcouncil.com/mayor-kenney-signs-councilmember-johnsons-philadelphia-international-airport-prevailing-wage-bill/>
- 24 Stephen L. Johnson. "American Airlines Letter to Philadelphia City Councilman Kenyatta Johnson," May 2021. Page 2. Obtained via Freedom of Information Act request (On file with SEIU).
- 25 Texas Legislature. "HB 2127 (Final Version)," 88th Regular Session, 2023. <https://capitol.texas.gov/tlodocs/88R/billtext/html/HB02127F.htm>
- 26 Chris Maberry. Oral testimony given to the Texas House of Representatives Committee on State Affairs, March 15, 2023. See 3:32:08 for testimony. https://tlchouse.granicus.com/MediaPlayer.php?view_id=78&clip_id=24052
- 27 Alex Barreira. "S.F. Supervisors unanimously approve SFO ordinance that airport says could double health costs," *San Francisco Business Times*, November 3, 2020. <https://www.bizjournals.com/sanfrancisco/news/2020/11/03/healthy-airport-ordinance-passes-board-supes-sf.html>
- 28 Rob DeLucia (Airlines for America) to Curren Price (Los Angeles City Council Economic Development Committee Chair). "Motion #15-0817-S1 on Living Wage at LAX Airport," November 28, 2017. Public Records of the Los Angeles City Council. https://clkrep.lacity.org/online/docs/2015/15-0817-S1_pc_11-28-17.pdf
- 29 "Airport commission gets pushback on possible MSP wage hike," *Twin Cities Pioneer Press*, October 28, 2015. <https://www.twincities.com/2015/04/19/airport-commission-gets-pushback-on-possible-msp-wage-hike/>

- 30 Luz Lazo. "Contract workers at National and Dulles look to 2017 for a wage increase win," *The Washington Post*, December 29, 2016. https://www.washingtonpost.com/local/trafficandcommuting/contract-workers-at-national-and-dulles-look-to-2017-for-a-wage-increase-win/2016/12/29/6d87eb12-c3a2-11e6-9578-0054287507db_story.html; Fran Spielman. "\$13.45-an-hour cleared for takeoff at O'Hare, Midway airports," *Chicago Sun-Times*, September 6, 2017. <https://chicago.suntimes.com/2017/9/6/18395163/13-45-an-hour-wage-cleared-for-takeoff-at-o-hare-midway-airports>; Fran Spielman. "Airport contract workers to get raise — and then another next year," *Chicago Sun-Times*, January 24, 2022. <https://chicago.suntimes.com/city-hall/2022/1/24/22899874/higher-hourly-pay-airport-contract-workers-ohare-midway-chicago-city-council-committee-vote>
- 31 See, *Restrictions on Compensation Under the CARES Act*, Congressional Research Service, June 12, 2020. <https://crsreports.congress.gov/product/pdf/IN/IN11422>; The average pay increase for Delta, United, Southwest, and American Airlines CEOs in 2023 vs. 2019 was 85.88%. Excluding Southwest, the average increase was 105%. 2019 compensation is not inflation-adjusted. United Airlines Holdings, Inc. *Proxy Statement* (Form DEF 14A), April 26, 2024. Page 113. <https://www.sec.gov/ix?doc=/Archives/edgar/data/100517/000155837024005036/tmb-20240522xdef14a.htm>; United Airlines Holdings, Inc. *Proxy Statement* (Form DEF 14A), April 9, 2020. Page 49. <https://www.sec.gov/Archives/edgar/data/100517/000104746920002218/a2241177zdef14a.htm>; Delta Air Lines, Inc. *Proxy Statement* (Form DEF 14A), April 26, 2024. Page 45. <https://d18rn0p25nwr6d.cloudfront.net/CIK-0000027904/8458993a-1ffb-485d-9efa-7a9e921adff7.pdf>; Delta Air Lines, Inc. *Proxy Statement* (Form DEF 14A), April 29, 2020. Page 36. <https://d18rn0p25nwr6d.cloudfront.net/CIK-0000027904/9e186b87-c407-4447-b1fb-0968c4aa42df.pdf>; American Airlines Group Inc. *Proxy Statement* (Form DEF 14A), April 25, 2024. Page 64. <https://americanairlines.gcs-web.com/static-files/6464f15f-a2ea-4968-895f-60a76870e558>; American Airlines Group Inc. *Proxy Statement* (Form DEF 14A), April 28, 2020. Page 61. <https://americanairlines.gcs-web.com/static-files/0a9f43d5-2827-4f25-9ba0-448a0b4cc57e>; Southwest Airlines Co. *Proxy Statement* (Form DEF 14A), April 5, 2024. Page 48. <https://otp.tools.investis.com/clients/us/southwest/SEC/sec-show.aspx?FilingId=17432316&Cik=0000092380&Type=PDF&hasPdf=1>; Southwest Airlines Co. *Proxy Statement* (Form DEF 14A), April 9, 2020. Page 27. <https://otp.tools.investis.com/clients/us/southwest/SEC/sec-show.aspx?FilingId=14065471&Cik=0000092380&Type=PDF&hasPdf=1>
- 32 The increase was 171.47%. Doug Parker was American's CEO between 2019-2021 and Robert Isom was the CEO thereafter, so technically Isom did not receive the pay increases between 2019 and 2021. American Airlines Group Inc. *Proxy Statement* (Form DEF 14A), *supra* note 31.
- 33 American Airlines Group Inc. *Proxy Statement* (Form DEF 14A), April 23, 2001. Page 14. <https://www.sec.gov/Archives/edgar/data/6201/000091205701509887/0000912057-01-509887.txt>
- 34 Estimate based on analysis of data from the Bureau of Labor Statistics (analysis on file with SEIU).
- 35 Sareen Habeshian. "The Fastest-growing U.S. Cities are Roasting in Extreme Heat," *Axios*, August 2023. <https://www.axios.com/2023/08/13/extreme-heat-climate-change-sunbelt-growth-cities>
- 36 Ayurella Horn-Muller. "Workers across the US rally after string of heat-related deaths," *Grist*, August 2024. <https://grist.org/extreme-heat/heat-week-workers-rally-extreme-heat-protection/>; Noah Weiland. "Workers Exposed to Extreme Heat Have Few Protections," *The New York Times*, October 2023. <https://www.nytimes.com/2023/10/05/health/heat-exposure-workers-osha.html>
- 37 Id.
- 38 Survey results on file with SEIU.
- 39 NOAA Research. "Aviation is responsible for 3.5 percent of climate change, study finds,"

- September 2020. <https://research.noaa.gov/aviation-is-responsible-for-35-percent-of-climate-change-study-finds/>
- 40 American Airlines Group. *ESG Report 2021*, Fiscal Year Ended December 31, 2021, n.d. Pages 23-25. <https://www.aa.com/content/images/customer-service/about-us/corporate-governance/esg/aag-esg-report-2021.pdf>; American Airlines Group. *Sustainability Report 2022*, Fiscal Year Ended December 31, 2022, n.d. Pages 24-26. <https://s202.q4cdn.com/986123435/files/images/esg/aa-sustainability-report-2022.pdf>
- 41 Airlines for America. "Who We Are," n.d. Accessed April 14, 2025. <https://www.airlines.org/who-we-are/>; IATA. "Membership of the Board of Governors," October 22, 2024. Accessed April 14, 2025. <https://www.iata.org/contentassets/01e197ea66384f27a9e763d151ae2d7d/board-membership.pdf>
- 42 Airlines for America. "What They're Saying: New Jersey's Proposed Jet Fuel Tax Hike," June 2016. Page 4. https://www.airlines.org/wp-content/uploads/2016/06/NJ-Fuel-Tax_What-They-Are-Saying.pdf; Amanda Hoover. "N.J. Dems want to raise tax on jet fuel to fund PATH, but airlines hope the idea crashes and burns," NJ.com, December 17, 2018. <https://www.nj.com/news/2018/12/nj-dems-want-to-raise-tax-on-jet-fuel-to-fund-path-but-airlines-hope-the-idea-crashes-and-burns.html>
- 43 Airlines for America. "What They're Saying: New Jersey's Proposed Jet Fuel Tax Hike," *supra* note 42 at page 3.
- 44 LobbyFacts. "Airlines for America," Datacard, February 24, 2021. Accessed April 14, 2025. <https://www.lobbyfacts.eu/datacard/airlines-for-america?rid=78160685782-84&sid=134382>
- 45 Airlines for America. "Feedback on the ReFuelEU Aviation – Sustainable Aviation Fuels Road map," Ares(2020)1725215, April 21, 2020. European Commission. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12303-Sustainable-aviation-fuels-ReFuelEU-Aviation/F513318_en
- 46 Airlines for America. "Feedback on Revision of the EU Emission Trading System Directive 2003/87/EC concerning aviation," Ares(2020)3515933, November 8, 2021. European Commission. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12494-EU-emissions-trading-system-updated-rules-for-aviation/F2751094_en
- 47 InfluenceMap, *The Aviation Industry and European Climate Policy*, June 2021. <https://influencemap.org/report/Aviation-Industry-Lobbying-European-Climate-Policy-131378131d9503b4d32b365e54756351>
- 48 Andrew Schwartz. "The Realities of Economic Development Subsidies," Center for American Progress, November 2018. <https://www.americanprogress.org/article/realities-economic-development-subsidies/>
- 49 Ashley Mahoney. "Charlotte Airport Expansion Includes Hotels, a Brewery, and a Medical Office," *Axios Charlotte*, January 2024. <https://www.axios.com/local/charlotte/2024/01/23/charlotte-airport-expansion-hotels-brewery-restaurants>
- 50 Charlotte Douglas International Airport, *Annual Comprehensive Financial Report*, City of Charlotte, North Carolina, Fiscal Year Ended June 30, 2024. Page 130. https://assets.ctfassets.net/jaw4bomip9l3/7HuRt7lGDJcGN4ptxlaprY/405383f435b3214ed03c7f01ea667f54/CLTAirportACFR_2024_012825_web_for_Website_Posting.pdf
- 51 Total number as of June 2023. Category includes workers in security, food service, janitorial, retail, office and administration, cargo and freight handling, dispatch, shuttle drivers, passenger attendants, vehicle cleaning, and other transportation service work at 135 Large, Medium, and Small Airport Hubs.
- 52 According to the MIT Living Wage Calculator for a single adult with no children in Phoenix-Mesa-Chandler, AZ, Charlotte-Concord-Gastonia, NC, and Dallas-Fort Worth-Arlington, TX metropolitan statistical areas. Amy K. Glasmeier, "Living Wage Calculator," Massachusetts Institute of Technology, February 10, 2025. Accessed April 14, 2025. <https://livingwage.mit>

edu/metros/38060, <https://livingwage.mit.edu/metros/16740>, and <https://livingwage.mit.edu/metros/19100>. See, e.g., job postings at each airport earning \$14/hr, \$14/hr, and \$14.70/hr wages, respectively: Prospect Airport Services. "Passenger Runner/Escort Unaccompanied Minors – CLT," Indeed, n.d. Accessed April 14, 2025. https://www.indeed.com/viewjob?jk=898ce3c4eadd80d5&from=shareddesktop_copy; ABM Industries. "Overnight Cabin Cleaner – DFW," Indeed, n.d. Accessed April 14, 2025. https://www.indeed.com/viewjob?jk=d9c6278e0e7f0c50&from=shareddesktop_copy; Prospect Airport Services. "Passenger Wheelchair Assistant – PHX," Indeed, n.d. Accessed April 14, 2025. https://www.indeed.com/viewjob?jk=d238d1382832320b&from=shareddesktop_copy.

- 53 Michael Sainato. "'Your body is completely drained': US workers toil in heatwaves with no protections," *The Guardian*, July 29, 2024. <https://www.theguardian.com/us-news/article/2024/jul/29/worker-protections-heatwave-extreme-temperatures-weather>
- 54 Analysis of Bureau of Labor Statistics data on file with SEIU, using weighted average of the median hourly wage, using the NAICS codes for scheduled air transportation and support activities for air transportation; wages adjusted for inflation from April 2003 to April 2023. U.S. Bureau of Labor Statistics. "CPI Inflation Calculator," n.d. Accessed April 14, 2025. https://www.bls.gov/data/inflation_calculator.htm
- 55 American Airlines Group Inc. "American Airlines reports fourth-quarter and full-year 2024 financial results," news.aa.com, January 23, 2025. <https://news.aa.com/news/news-details/2025/American-Airlines-reports-fourth-quarter-and-full-year-2024-financial-results-CORP-FI-01/>; American Airlines Group Inc. *Proxy Statement* (Form DEF 14A), April 25, 2024. Page 64. <https://americanairlines.gcs-web.com/static-files/6464f15f-a2ea-4968-895f-60a76870e558>
- 56 Survey data on file with SEIU.
- 57 Aurelia Glass and Karla Walter. "Too Many Airport Service Workers Earn Low Wages and Benefits," Center for American Progress, January 2025. <https://www.americanprogress.org/article/too-many-airport-service-workers-earn-low-wages-and-benefits/>
- 58 Analysis of Bureau of Labor Statistics data on file with SEIU, *supra* note 54.
- 59 Survey data on file with SEIU.
- 60 Spending no more than 30% of income on rent, the general guideline for determining housing affordability. According to the U.S. Department of Housing and Urban Development (HUD), the Fair Market Rent (FMR) for a one-bedroom apartment for Fort Worth-Arlington, TX HUD Metro FMR Area is \$1,461 per month and \$1,606 for the Dallas Metro area. RentData.org. "Texas Fair Market Rent for 2025," n.d. Accessed April 14, 2025. <https://www.rentdata.org/states/texas/2025>
- 61 The Charlotte-Concord-Gastonia, NC-SC HUD Metro FMR is \$1,647/month for a one-bedroom apartment. RentData.org. "Charlotte-Concord-Gastonia Fair Market Rent," Financial Year 2025, n.d. Accessed April 14, 2025. <https://www.rentdata.org/charlotte-concord-gastonia-nc-sc-hud-metro-fmr-area/2025>
- 62 The Phoenix-Mesa-Scottsdale, AZ HUD Metro FMR is \$1,679/month for a one-bedroom apartment. RentData.org. "Phoenix-Mesa-Scottsdale Fair Market Rent," Financial Year 2025, n.d. Accessed April 14, 2025. <https://www.rentdata.org/phoenix-mesa-scottsdale-az-msa/2025>
- 63 The Fort Worth-Arlington, TX HUD Metro FMR has increased 71 percent compared to 2019, when FMR was \$853/month, and the Dallas, TX HUD Metro FMR has increased by 62 percent compared to 2019, when FMR was \$989. RentData.org. "Texas Fair Market Rent for 2019," n.d. Accessed April 14, 2025. <https://www.rentdata.org/states/texas/2019>; the Charlotte-Concord-Gastonia, NC-SC HUD Metro FMR has nearly doubled since 2019, increasing by 84%, from \$897/month. RentData.org. "Charlotte-Concord-Gastonia Fair Market Rent," Financial Year 2019, n.d. Accessed April 14, 2025. <https://www.rentdata.org/charlotte-concord-gastonia-nc-sc-hud-metro-fmr-area/2019>; the Phoenix-Mesa-Scottsdale, AZ HUD Metro FMR has nearly doubled since 2019, increasing by 93.43 percent, from \$897/month. RentData.org. "Phoenix-Mesa-Scottsdale Fair Market Rent," Financial Year 2019, n.d. Accessed April 14, 2025. <https://www.rentdata.org/phoenix-mesa-scottsdale-az-msa/2019>

www.rentdata.org/phoenix-mesa-scottsdale-az-msa/2019; For 2025 FMR in the aforementioned areas, see *supra* notes 60-62.

64 Survey data on file with SEIU.

65 tatement on file with SEIU.

66 Id.

67 Hannah Yasharoff. "American Eagle mechanic, 35, dies after being crushed by aircraft machinery at Chicago O'Hare," *USA Today*, December 16, 2020. <https://www.usatoday.com/story/travel/news/2020/12/16/chicago-ohare-airport-worker-dies-after-getting-crushed-machinery/3918797001/>

68 David Shepardson. "Worker killed on ramp at Alabama airport in airplane incident," *Reuters*, December 31, 2022. <https://www.reuters.com/world/us/worker-killed-ramp-alabama-airport-airplane-incident-2023-01-01/>

69 Phil Helsel. "Ground worker at New Orleans airport dies after hair becomes entangled in machinery," *NBC News*, August 31, 2022. <https://www.nbcnews.com/news/us-news/ground-worker-new-orleans-airport-killed-machinery-accident-rcna45804>

70 *CBS News / Associated Press*. "American Airlines worker dies after crash with jet bridge at Austin airport terminal," April 21, 2023. <https://www.cbsnews.com/news/american-airlines-worker-dies-crash-jet-bridge-austin-airport-terminal/>; Britny Eubank. "Austin airport death: Employee hit, killed in crash while on-duty," *KVUE*, October 31, 2023. <https://www.kvue.com/article/news/local/austin-airport-employee-killed-on-duty/269-01060664-2232-4c88-a4c8-ea526a6f1d2b>

71 Doha Madani and Elizabeth Maline. "Death of Texas airport worker who was 'ingested' in airplane engine is ruled a suicide," *NBC News*, June 26, 2023. <https://www.nbcnews.com/news/us-news/death-texas-airport-worker-was-ingested-airplane-engine-ruled-suicide-rcna91246>

72 Mike Wendling. "Two Delta workers killed while servicing plane at airport," *BBC*, August 27, 2024. <https://www.bbc.com/news/articles/cpqjyz7jywxo>

73 Connor Lomis. "Aircraft Tug Killed American Airlines Employee at Charlotte Airport, Police Confirm," *WBTV*, January 2025. <https://www.wbvtv.com/2025/01/28/american-air-lines-tug-hits-kills-employee-tarmac-charlotte-airport/>

74 The MGM, ORD, CLT, and one of the AUS incidents were American Airlines or Piedmont Airlines employees.

75 SEIU-USWW. *Standing Up for Passenger Safety at LAX*, March 18, 2014. Page 7. Copy on file with SEIU.

76 Minyvonne Burke. "3 people shot and 1 person stabbed at Phoenix airport following apparent family dispute," *NBC News*, December 26, 2024. <https://www.nbcnews.com/news/us-news/3-people-shot-1-person-stabbed-phoenix-airport-apparent-family-dispute-rcna185436>

77 Prospect Airport Services. "Airline Passenger Wheelchair Assistant," *SimplyHired*, n.d. Accessed March 11, 2025. https://www.simplyhired.com/job/D8J2l3szmbSSm_1ZygzzfO_6HdpAa8ODfh0VhCVa0lgYuBtT3h8Ftg

78 Melifaite Cine. "Holiday travelers should know how few airport workers are trained for emergencies," *NBC News*, December 22, 2017. <https://www.nbcnews.com/think/opinion/holiday-travelers-should-know-how-few-airport-workers-are-trained-ncna831561>; Marisa Endicott. "Airport Workers Strike to Demand Higher Wages, More Training," *U.S. News and World Report*, April 1, 2016. <https://www.usnews.com/news/articles/2016-04-01/airport-workers-strike-to-demand-higher-wages-more-training>

79 Aurelia Glass and Karla Walter. "Airport Service Workers Deserve Good Jobs," *Center for American Progress*, March 7, 2023. <https://www.americanprogress.org/article/airport-service-workers-deserve-good-jobs/>; Survey data on file with SEIU.

80 Noah Weiland. *Supra* note 36; Michael Levenson. "Amid Oppressive Heat, Broiling Airplane Cabins Add to Travelers' Woes," *The New York Times*, July 2024. <https://www.nytimes.com>

- /2024/07/11/weather/extreme-heat-planes-flying-airlines.html
- 81 Joshua Partlow. "Nausea, brutal heat: Phoenix airport workers file safety complaints," *The Washington Post*, September 2023. <https://www.washingtonpost.com/climate-environment/2023/09/06/phoenix-excessive-heat-airport-workers/>
- 82 Morgan Fischer. "'Can't ignore it anymore': Sky Harbor workers demand more heat relief," *Phoenix New Times*, August 2024. <https://www.phoenixnewtimes.com/news/phoenix-sky-harbor-airport-workers-demand-heat-protections-19732441>; Michael Levenson. *Supra* note 80.
- 83 NOAA Research. *Supra* note 39; Service Employees International Union. *Risk: American Airlines' Environmental and Lobbying Misalignment Could Impact Shareholders, Workers, and the Environment*, April 2024. https://drive.google.com/file/d/1JFgSy84061kyDY7cHIX2nkkPqkHk-8wUq/view?usp=drive_link
- 84 Wyatt Myskow. "The Sunbelt's Growing Population Faces Increasing Climate Hazards," *Inside Climate News*, December 18, 2024. <https://insideclimatenews.org/news/18122024/sunbelt-growing-population-faces-increasing-climate-hazards/>
- 85 *Supra* notes 41-47.
- 86 Noah Weiland. *Supra* note 36; Herbert L. White. "Charlotte airport workers urge cool for the hottest jobs," *The Charlotte Post*, August 2024. <https://www.thecharlottepost.com/news/2024/08/14/local-state/charlotte-airport-workers-urge-cool-for-the-hottest-jobs/>; Morgan Fischer. *Supra* note 82.
- 87 Mickaela Castillo. "Sky Harbor contract employees protest for extreme heat protections," *Arizona's Family*, October 2024. <https://www.azfamily.com/2024/10/09/sky-harbor-contract-employees-protest-extreme-heat-protections/>; Noah Weiland. *Supra* note 36.
- 88 Mickaela Castillo. *Id*; Chase Golightly. "Protest held near Sky Harbor after employee claims she was fired for speaking out on work issues, getting involved with union," *12News*, October 2024. <https://www.12news.com/article/news/local/valley/protest-held-near-sky-harbor-after-employee-claims-she-was-fired-for-speaking-out-work-issues-getting-involved-union/75-49b386ff-ea08-4926-a7a6-b05940f6ca08>; Herbert L. White. *Supra* note 86.
- 89 Survey data on file with SEIU.
- 90 *Id*.
- 91 *Id*.
- 92 *Id*.
- 93 Airport Workers United (@GoodAirports). "'Some workers report being too afraid to even take a short break when they feel the signs of heat illness because they are afraid to be disciplined.' #HeatJustice," X, February 3, 2024. <https://x.com/GoodAirports/status/1823817790052307249>
- 94 Service Employees International Union, *AFL-CIO v. ABM Industries*. Case no. 28-CA-353266, National Labor Relations Board, October 7, 2024; Service Employees International Union, *AFL-CIO v. Prospect Airport Services*. Case no. 28-CA-353271, National Labor Relations Board, October 7, 2024.
- 95 Statement on file with SEIU.
- 96 Noah Weiland. *Supra* note 36.
- 97 Hayleigh Evans. "With little rain, long heat waves, 2024 will end as the warmest year on record in Phoenix," *The Arizona Republic*, December 2024. <https://www.azcentral.com/story/news/local/arizona-weather/2024/12/30/phoenix-weather-2024-warmest-year/77206732007/>
- 98 *Associated Press*. "Phoenix Hit 110 Degrees On 54 Days in 2023, Setting Another Heat Record," *PBS News*, September 2023. <https://www.pbs.org/newshour/nation/phoenix-hit-110-degrees-on-54-days-in-2023-setting-another-heat-record>
- 99 Laurie Baratti. "Airport Workers Suffering Under Extreme Heat Call for Congressional Action," *TravelPulse*, July 30, 2023. <https://www.travelpulse.com/news/airlines-airports/airport-workers-suffering-under-extreme-heat-call-for-congressional-action>

- 100 O'Hara Shipe. "Sky Harbor workers complain of hellish conditions, low wages." *Phoenix New Times*, September 14, 2023. <https://www.phoenixnewtimes.com/news/phoenix-sky-harbor-airport-workers-complain-of-hellish-conditions-low-wages-17120814>; Michael Levenson. *Supra* note 80.
- 101 Survey results on file with SEIU.
- 102 City of Phoenix Aviation Department. "Phoenix Sky Harbor International Airport Taking Proactive Measures After Water Tests Detect Legionella," July 23, 2024. <https://www.phoenix.gov/newsroom/aviation/3172>, archived at Internet Archive: Wayback Machine, August 6, 2024. <https://web.archive.org/web/20240806051700/https://www.phoenix.gov/newsroom/aviation/3172>
- 103 City of Phoenix Aviation Department. "Aviation Department Heat Illness & Injury Prevention Program," April 26, 2024. Obtained via Freedom of Information Act request.
- 104 Dallas Fort Worth International Airport Board. "Minutes of the Regular Meeting of the Dallas Fort Worth International Airport Board," DFW Airport Board Portal, September 7, 2023. Page 6. <https://apps.dfwairport.com/board/doc.php?docid=145295&date=Sep%207,%202023>
- 105 Airport Workers United (@GoodAirports). "'We're at @AmericanAir HQ today, and AA executives are refusing to come outside to speak with us...'," X, August 14, 2024. <https://x.com/GoodAirports/status/1823824055293927710>
- 106 Connor Lomis and Brandy Beard. "'No water is available': CLT Airport workers protest lack of basic protections," *WBTV*, August 13, 2024. <https://www.wbvtv.com/2024/08/13/no-water-is-available-clt-airport-workers-protest-lack-basic-protections/>
- 107 32BJ SEIU /// #BuildingJustice (@32BJSEIU). "On Wed CLT airport workers employed by ABM and Prospect delivered petitions demanding access to clean drinking water, easier access to pay stubs, and respect." X, October 4, 2024. <https://x.com/32BJSEIU/status/1842209031571624104>
- 108 Ken Jacobs. *Labor standards and airport safety and security*, *supra* note 5; Ray White. "Statement and Comments," *supra* note 6.
- 109 Ken Jacobs. *Labor standards and airport safety and security*, *supra* note 5.
- 110 U.S. Department of Transportation, Office of Aviation Consumer Protection. "Air Travel Consumer Report: February 2024," February 2024. Page 42. <https://www.transportation.gov/sites/dot.gov/files/2024-11/February%202024%20ATCR%20revised%2011-06-2024.pdf>
- 111 *Id.* Page 47.
- 112 *Id.* Page 50.
- 113 *Id.* Page 10.
- 114 U.S. Department of Transportation, Office of Aviation Consumer Protection. "Traveling with a Disability," U.S. Department of Transportation, February 10, 2025. Accessed April 4, 2025. <https://www.transportation.gov/individuals/aviation-consumer-protection/traveling-disability>
- 115 U.S. Government Accountability Office. *Passengers with Disabilities: Airport Accessibility Barriers and Practices and DOT's Oversight of Airlines' Disability-Related Training*, GAO-21-354, April 2021. Pages 32-33. <https://www.gao.gov/assets/gao-21-354.pdf>
- 116 Paralyzed Veterans of America. "Answers to Questions Presented by the U.S. Department of Transportation," submitted to U.S. Department of Transportation, Docket No. DOT-OST-2022-0014-0146, April 8, 2022. Page 1. <https://www.regulations.gov/comment/DOT-OST-2022-0014-0146>
- 117 *Id.*
- 118 U.S. Department of Transportation. "DOT Issues Landmark \$50 Million Penalty Against American Airlines for Its Treatment of Passengers with Disabilities," U.S. Department of Transportation, October 23, 2024. <https://www.transportation.gov/briefing-room/dot-issues-landmark-50-million-penalty-against-american-airlines-its-treatment>
- 119 U.S. Department of Transportation, Office of Aviation Consumer Protection. "Air Travel Consumer Report: February 2024," *supra* note 114 at page 47.
- 120 U.S. Department of Transportation. "DOT Issues Landmark \$50 Million Penalty," *supra* note 118.

- 121 Survey data on file with SEIU.
- 122 Id.
- 123 Dallas Fort Worth International Airport. *Annual Comprehensive Financial Report*, Cities of Dallas and Fort-Worth, Texas, Fiscal Year Ended September 30, 2021. Page 87. https://assets.ctfassets.net/m2p70vmwc019/7mSf7rY1p2GxR2hty008Rb/530b421d201eaccd2154a13e676a6353/FY_2021_Annual_Comprehensive_Financial_Report.pdf; DFW implemented this “hybrid” business model in 2010. See Dallas Fort Worth International Airport. *Annual Comprehensive Financial Report*, Cities of Dallas and Fort-Worth, Texas, Fiscal Year Ended September 30, 2010. Page ii. https://assets.ctfassets.net/m2p70vmwc019/NEOGXvttEja6T8n3mxVdn/a05f216a68a2e7cf77c6413a1b912c23/DFW_Investors_Financials_Comprehensive_Annual_Financial_Report_FY_2010.pdf
- 124 City of Charlotte and Signatory Airlines. “Airline Lease and Use Agreement,” Document No. A0347983.1, July 1, 2016–June 30, 2026. Page 44. https://downloads.ctfassets.net/jaw4bomip9l3/4COrUe7C3U6WW1XfzLTmTZ/e0d613d55d9b9b4eacec8595e35a01f2/Airline_Use_and_Lease_Agreement_July_1_2016-June_30_2026.pdf; Dallas Fort Worth International Airport. *Annual Comprehensive Financial Report*, Fiscal Year Ended September 30, 2010. *Supra* note 123 at page ii. If the DFW cost center generates net revenues below a pre-defined lower threshold, then landing fees are increased until DFW meets the lower threshold; however, the inflation-adjusted threshold triggering net revenue sharing with airlines has been exceeded every year since it was enacted in FY 2011.
- 125 Airlines’ proportional contribution to the airport’s operating budget, through aeronautical revenue sources like terminal rent and landing fees, fell between 2019 and 2024, while the proportion of non-aeronautical revenue (passenger-generated sources) increased. Federal Aviation Administration. “(CATS) Operating and Financial Summary Report 127,” Certification Activity Tracking System (CATS). Years analyzed: 2019 and 2024. Accessed March 26, 2025. <https://cats.airports.faa.gov/Reports/rpt127.cfm>
- 126 Seth B. Young and Alexander T. Wells. *Airport Planning & Management*, 6th edition, New York: McGraw Hill, April 5, 2011. Page 363.
- 127 See, e.g., WSOCTV.com News Staff. “Charlotte Douglas Airport increasing parking rates,” WSOCTV, November 6, 2023. <https://www.wsoc.tv/news/local/charlotte-douglas-airport-increase-parking-rates/766M63H475E2NIXSQZKGHTA2T4/>
- 128 See, e.g., *supra* note 124.
- 129 Dallas Fort Worth International Airport. *Annual Comprehensive Financial Report*, Fiscal Year Ended September 30, 2010. *Supra* note 123 at page ii.
- 130 Dallas Fort Worth International Airport. “DFW Total Passengers – December, 2024,” December 2024. https://assets.ctfassets.net/m2p70vmwc019/3cU8D5NJMkmlGtL3s9JfyV/5bdb553928b-b14c322826801ec78d949/December_2024_Pax_Report.pdf
- 131 Calculations are based on an analysis of DFW’s ACFRs for FY 2011 through FY 2023, not adjusted for inflation. ACFRs are available at <https://www.dfwairport.com/business/about/investors/>.
- 132 City of Charlotte and Signatory Airlines. “Airline Lease and Use Agreement,” *supra* note 124 at page 44.
- 133 Charlotte Douglas International Airport. *Annual Comprehensive Financial Report*, *supra* note 50 at page 96.
- 134 City of Charlotte and Signatory Airlines. “Airline Lease and Use Agreement,” *supra* note 124 at page 44.
- 135 City of Charlotte and Signatory Airlines. “Airline Lease and Use Agreement,” *supra* note 124 at page 44 and PDF pages 116-117 (Exhibit H).
- 136 Airfield revenue between 2019 and 2023 compared. Charlotte Douglas International Airport, *Annual Comprehensive Financial Report*, City of Charlotte, North Carolina, Fiscal Year Ended

- June 30, 2023. Page 96. https://downloads.ctfassets.net/jaw4bomip9l3/6aqqL50z6xQqhjzY6xVysG/def4c1fc946ce757f18c9331fc409499/FY_20223_ACFR_12.20.2023_FINAL.pdf
- 137 Parking revenue between 2019 and 2023 compared. Charlotte Douglas International Airport, *Annual Comprehensive Financial Report*, *supra* note 136 at page 96.
- 138 WSOCTV News Staff. "Charlotte Douglas Airport increasing parking rates," *supra* note 127.
- 139 City of Charlotte, North Carolina. *Preliminary Official Statement – Charlotte Douglas International Airport, Airport Revenue Bonds, Series 2023A (Non-AMT) and Series 2023B (AMT)*, August 30, 2023. Page 40, fns. 3 and 8. <https://www.charlottencbonds.com/city-of-charlotte-bonds-nc/documents/view-file/i1844?mediald=777864>
- 140 Charlotte Douglas International Airport. *Annual Comprehensive Financial Report*, *supra* note 50 at page 32.
- 141 Federal Aviation Administration. "(CATS) Operating and Financial Line Item Report 127," *supra* note 18.
- 142 Hannah Towey. "These are the most - and least - expensive airports to fly from in the US," *Business Insider*. August 2023. <https://www.businessinsider.com/most-expensive-and-cheapest-airports-in-the-us-flights-2023-8>
- 143 Katie Peralta Soloff. "Frontier adds CLT direct flights starting at \$19," *Axios Charlotte*, January 2024. <https://www.axios.com/local/charlotte/2024/01/23/frontier-adds-cheap-direct-flights-charlotte-douglas-airport>
- 144 City of Phoenix Aviation Department. *Annual Comprehensive Financial Report*, City of Phoenix, Arizona, Fiscal Year Ended June 30, 2023. Page 12. <https://www.skyharbor.com/media/1n0ayhaz/annual-report-2023.pdf>
- 145 Id.
- 146 Federal Aviation Administration. "(CATS) Operating and Financial Summary Report 127," Certification Activity Tracking System (CATS). Accessed March 26, 2025. <https://cats.airports.faa.gov/Reports/rpt127.cfm>. Years analyzed: 2019 and 2024.
- 147 U.S. Department of the Treasury. "Airline and National Security Relief Programs," n.d. Accessed March 26, 2025. <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-american-industry/airline-and-national-security-relief-programs>
- 148 Megan Lohden. "IATA declares the airline industry has 'fully recovered' from the COVID pandemic," *Aviation Business News*, June 25, 2024. <https://www.aviationbusinessnews.com/industry-news/iata-declares-the-airline-industry-has-fully-recovered-from-the-covid-pandemic/>
- 149 City of Phoenix Aviation Department. *Annual Comprehensive Financial Report*, City of Phoenix, Arizona, Fiscal Year Ended June 30, 2024. Page 26. <https://www.skyharbor.com/media/rbwfcqrd/annual-report-2024.pdf>
- 150 Id.
- 151 Donna M. Airoidi. "J.D. Power: Travelers 'Enjoying' Airports, but Spend Down," *Business Travel News*, September 18, 2024. <https://www.businesstravelnews.com/Transportation/Air/JD-Power-Travelers-Enjoying-Airports-but-Spend-Down>
- 152 \$3.6B in PFCs collected in CY2023. Federal Aviation Administration, Airports Policy Branch. "Key Passenger Facility Charge Statistics," February 28, 2025. Page 2. Accessed March 23, 2025. <https://www.faa.gov/sites/faa.gov/files/2025-02/arp-pfc-monthly-reports-stats-20250228.pdf>; Almost \$2B in AIP grants in FY2024. Federal Aviation Administration. "Fiscal Year 2024 AIP Summary (All Grants)," October 1, 2024. Found at Airport Improvement Program (AIP) Grant Histories, https://www.faa.gov/airports/aip/grant_histories#history. Summary of AIG column; \$1.2B in Fiscal Year 2024 in general revenue tax funding from the federal government for FAA operations. Federal Aviation Administration. "AATF-Fact-Sheet-2025.pptx" (Power Point), February 2025. Page 6. Found at Airport & Airway Trust Fund, <https://www.faa.gov/about/budget/aatf/airport-and-airway-administration-trust-fund-aatf-fact-sheet>. General Fund ("GF") total; \$6.3B in Financial Year 2024 in TSA aviation security appropriations, based on the

- difference between expenses and passenger security fee collections. Transportation Security Administration. "FY24 TSA Aviation Security Expenses vs. Offsetting Collections" (Chart), n.d. Accessed March 25, 2025. Found at Security Fees, <https://www.tsa.gov/for-industry/security-fees>.
- 153 Burns, Toros, and Flaming. "Flying Right," *supra* note 14 at page 8.
- 154 *Id.*
- 155 Congressional Research Service. *Infrastructure Investment and Jobs Act and Airport Funding*, February 24, 2022. Page 1. <https://crsreports.congress.gov/product/pdf/IN/IN11864/2>
- 156 Airports Council International – North America. *2023 U.S. Airport Infrastructure Needs Report*, March 23, 2023. Page 6. <https://airportscouncil.org/wp-content/uploads/2023/03/2023A-CI-NAInfrastructureNeedsReportFINAL.pdf>
- 157 U.S. Department of the Treasury. "Airline and National Security Relief Programs," *supra* note 147.
- 158 Congressional Research Service. *Infrastructure Investment and Jobs Act and Airport Funding*, *supra* note 155 at page 2.
- 159 In addition to the trend of big airports getting bigger (driven the hub model of the big four airlines), smaller regional airports across the U.S. are increasing seeing less and less access to flights, exacerbated by the pandemic. In at least a dozen cases, airlines' exits from regional airports since 2020 caused some markets to lose all commercial passenger air service, including in Williamsport, Pennsylvania, Dubuque, Iowa, and Del Rio, Texas. The loss of service in smaller locales has potentially disastrous consequences for local economies, yet during COVID, American Airlines attempted to leverage its critical function to extract more payroll subsidies from the federal government. Alana Semuels. "Airlines Are Terrible. Small Cities Are Still Paying Them Millions of Dollars to Stick Around," *Time*, January 2023. <https://time.com/6247052/airlines-deregulation-american-inequality/>; Sean Cudahy. "America's smallest airports are hurting, even as more people than ever are flying," *The Points Guy*, April 2024. <https://thepointsguy.com/news/small-airports-service-cuts/>; "American Airlines Considering Cutting Flights To Many Small US Cities," *CBS News Texas*, August 13, 2020. <https://www.cbsnews.com/texas/news/american-airlines-considering-cutting-flights-small-us-cities/>
- 160 Dallas Fort Worth International Airport Board. "Minutes of the Regular Meeting of the Dallas Fort Worth International Airport Board," DFW Airport Board Portal, May 4, 2023. Page 6. <https://apps.dfwairport.com/board/doc.php?docid=143478&date=May%204,%202023>
- 161 Dallas Fort Worth International Airport. "DFW Airport Announces Start of Transformational Work on \$9 Billion Capital Plan with Reimagining of Terminal C," DFW Airport Newsroom, August 29, 2024. <https://www.dfwairport.com/dfwnewsroom/dfw-airport-announces-start-of-work-on-9b-capital-plan-with-terminal-c/>
- 162 Heather McCullough. "DFW Airport, Dallas Love Field Airport to receive \$28M in federal grants," *Community Impact*, October 25, 2024. <https://communityimpact.com/dallas-fort-worth/frisco/development/2024/10/25/dfw-airport-dallas-love-field-airport-to-receive-28m-in-federal-grants/>; American Airlines. "American Airlines and DFW Airport Sign Long-Term Use and Lease Agreement, Setting the Stage for Future Growth," *news.aa.com*, May 16, 2023. <https://news.aa.com/news/news-details/2023/American-Airlines-and-DFW-Airport-Sign-Long-Term-Use-and-Lease-Agreement-Setting-the-Stage-for-Future-Growth-OPS-INF-05/default.aspx>
- 163 Ted Reed. "Soaring travel demand, industry trends create golden times for Charlotte's airport," *supra* note 8.
- 164 *Id.*
- 165 Charlotte Douglas International Airport. "Airport Commercial Development Strategy," March 2017. https://downloads.ctfassets.net/jaw4bomip9l3/7uXSM106WtPJ97O4b41D4Z/d9213e2d85d9959c3087e88b66487834/CLT_ACDS_-_FINAL_Website_Size.pdf
- 166 "Part 150 – Airport Noise Compatibility Planning," Code of Federal Regulations, 14 C.F.R. pt. 150, last amended April 2, 2025. <https://www.ecfr.gov/current/title-14/chapter-I/subchapter-I/part-150>

- 167 Congressional Research Service. *Federal Airport Noise Regulations and Programs*, September 27, 2021. <https://www.congress.gov/crs-product/R46920>; Charlotte Douglas International Airport. *14 CFR Part 150 Noise Compatibility Program Study Update*, August 2024, Page 1-1. <https://cltpart150.com/wp-content/uploads/2024/08/14-DRAFT-CLT-Part-150-Study-Update-FULL-DOCUMENT.pdf>. (“[T]his Part 150 Study is aimed to identify noise noncompatible land uses and evaluate a variety of strategies to reduce noise in communities surrounding CLT.”)
- 168 Desiree Mathurin. “Charlotte airport noise plan to increase flight paths moves forward with council approval,” *Charlotte Observer*, December 10, 2024. <https://www.charlotteobserver.com/news/business/article296701269.html>
- 169 Julia Kauffman. “Homeownership is getting harder to achieve in Charlotte, housing study says,” *WCNC*, November 20, 2024. https://www.wcnc.com/article/money/markets/real-estate/affordable-housing-crisis/homeownership-challenges-charlotte-nc-11-20-2024/275-90a68582-2ca1-4d29-ac38-ec4033e2b01b?mc_cid=7acb088b2a&mc_eid=f7e7aca9e1
- 170 Erik Spanberg. “American Airlines CEO eyes next steps at CLT as lease negotiations with airport loom,” *Charlotte Business Journal*, December 9, 2024. <https://www.bizjournals.com/charlotte/news/2024/12/09/american-airlines-clt-airport-leases.html>
- 171 Charlotte Douglas International Airport. “Part 150 Study Update Public Information Meeting, Informational Boards,” November 2023. Available at cltpart150.com/documents-reports. https://cltpart150.com/wp-content/uploads/2023/11/CLT_PubMeetingBoards_Fall2023_v1n_PRINT.pdf; Charlotte Douglas International Airport. “Part 150 Study Update Public Information Meeting, Fact Sheet,” November 2023. Available at cltpart150.com/documents-reports. https://cltpart150.com/wp-content/uploads/2023/11/CLT-150_Handout2023_English_v1b.pdf
- 172 Charlotte Douglas International Airport. “Airport Community Roundtable,” n.d. <https://www.cltairport.com/community/noise/airport-community-roundtable/>, archived at Internet Archive: Wayback Machine, March 11, 2024. <https://web.archive.org/web/20240311162726/https://www.cltairport.com/community/noise/airport-community-roundtable/>
Part 150 Noise Compatibility Study Update,” Unapproved Summary Minutes, *Airport Community Roundtable Documents*, October 11, 2023. Page 2. (comments of Gabby Jones-Casey on file with SEIU) https://assets.ctfassets.net/jaw4bomip9l3/2c5COBwJkQMqDtonhOUk4l/6eee357bdd92817cf2c4d2a20de34656/10-11-2023_Summary_Minutes_-_Unapproved.pdf; Charlotte Douglas Airport Community Roundtable. “Charlotte Airport Community Roundtable (ACR), Part 150 Noise Compatibility Study Update,” Unapproved Summary Minutes, *Airport Community Roundtable Documents*, January 10, 2024. Page 2. (comments of Lisa Schuller on file with SEIU) https://assets.ctfassets.net/jaw4bomip9l3/76W3ToWbLTDWf7CmyPXAyB/26716535e846ba54f6b15a5082519d77/1-10-2024_Summary_Minutes_-_Unapproved.pdf; Charlotte Douglas Airport Community Roundtable. “Charlotte Airport Community Roundtable (ACR), Part 150 Noise Compatibility Study Update,” Unapproved Summary Minutes, *Airport Community Roundtable Documents*, June 10, 2024. Page 1. (comments of Resha Fortson on file with SEIU) https://assets.ctfassets.net/jaw4bomip9l3/87FE0Ql2Hj7YfvruMzMFO/78345b9064717d295b4a89c6185cc2a7/4-10-2024_Summary_Minutes_-_Unapproved.pdf
- 173 Melissa Yeager. “Sky Harbor Airport’s \$5.7 billion, 20-year plan: Double the capacity, add ‘bus gates,’” *The Arizona Republic*, June 12, 2019. <https://www.azcentral.com/story/travel/airlines/2019/06/11/phoenix-sky-harbor-airport-20-year-plan-approved-double-capacity-bus-gates/1370805001/>
- 174 American Airlines operates out of Terminal 4 and its Alliance partners JetBlue and Alaska Airlines are located in Terminal 3. For this reason, the Second North Concourse at Terminal 3 (T3N2), approved as part of the 2019 CAMP plan, where its partner airlines will be operating new gates, is relevant to American’s operations. Terminals 3 and 4 currently do not connect with each other behind security, limiting the ability of passengers to quickly move between

- the terminals to catch connecting flights. City of Phoenix Aviation Department. "Media Kit," June 17, 2024. Page 14. <https://www.skyharbor.com/media/dslhgfuz/2024-06-17-airport-media-kit.pdf>; In stakeholder meetings with the airport, American told airport planners it will need more international gates in the planned Terminal 4 Third North Concourse (T4N3) than what had been approved in the 2019 CAMP Plan. City of Phoenix Aviation Department. "CAMP Update – American Airlines Stakeholder Outreach Meeting and Follow-up," Internal Meeting Notes, October 5 and 14, 2021. Obtained via Freedom of Information Act request.
- 175 Lawrence J. Truitt and Stanley E. Fawcett. *Emerging as a Major Carrier: A Case Study of America West Airlines*, Journal of Aviation/Aerospace Education & Research, 1(2). Page 33. DOI: <https://doi.org/10.15394/jaaer.1990.1018>; Between 1980 and 1989 (and on), Sky Harbor saw huge traffic growth. Phoenix Sky Harbor International Airport. "Historical Traffic Statistics," Phoenix Sky Harbor, n.d. https://www.skyharbor.com/media/parj2te5/historic-statistics.pdf?sfvrsn=cc7a9a88_0
- 176 City of Phoenix. "City Council Formal Meeting Report: Contract for Legal Services (Ordinance S-50697)," City Council of Phoenix, March 20, 2024. <https://apps-secure.phoenix.gov/PublicRecordsSearch/Home/RenderPDF/?id=JRofEwxNo0E9ug+c0EKs/AnircMMAbaa9B2nOLtj9z8=>
- 177 Brenna Goth. "After 699 demolitions, man fights to save family home in historic Phoenix neighborhood," *The Arizona Republic*, June 13, 2016. <https://www.azcentral.com/story/news/local/phoenix/2016/06/13/phoenix-historic-homes-demolished-one-left/85524738/>; Taylor Seely. "Interstate highways displaced thousands in Phoenix. The consequences were long-lasting," *The Arizona Republic*, November 18, 2020. <https://www.azcentral.com/story/news/local/phoenix-history/2020/11/18/how-interstates-10-17-displaced-thousands-phoenix-barrios/3595374001/>
- 178 Taylor Seely. "Interstate highways displaced thousands in Phoenix. The consequences were long-lasting," *supra* note 178.
- 179 Id.
- 180 City of Phoenix Aviation Department, Planning & Environmental Division. "PHX Land Reuse Strategy," Letter to Federal Aviation Administration, Phoenix Airports District Office, January 12, 2018. Stakeholder Meeting Materials, <https://www.skyharbor.com/about-phx/land-reuse-strategy/stakeholder-meeting-materials/>. Page 4. <https://www.skyharbor.com/media/r42ej4xl/phase1-jan2018-letter-to-faa.pdf>
- 181 Id.
- 182 Taylor Seely. "Interstate highways displaced thousands in Phoenix. The consequences were long-lasting," *supra* note 178.
- 183 Center for the Future of Arizona. "Understanding the Latest Data on Air Quality: An Important Factor in Overall Health and Well-Being in Arizona," Arizona Health and Well-Being Progress Meter, January 22, 2024. <https://www.arizonafuture.org/news-events/news/2024/01/understanding-the-latest-data-on-air-quality-an-important-factor-in-overall-health-and-well-being-in-arizona/>
- 184 Phoenix Sky Harbor International Airport. "Program Map," April 10, 2020. <https://www.skyharbor.com/about-phx/land-reuse-strategy/program-map/>. See "light industrial/flex" parcels near I-17.
- 185 American Airlines Group Inc. *Proxy Statement*, April 25, 2024. *Supra* note 31 at pages 64 and 70; Delta Air Lines, Inc. *Proxy Statement*, April 26, 2024. *Supra* note 31 at page 56; United Airlines Holdings, Inc. *Proxy Statement*, April 26, 2024. *Supra* note 31 at page 138; Southwest Airlines Co. *Proxy Statement*, April 5, 2024. *Supra* note 31 at page 50.
- 186 See Amanda Gallear. "The Impact of Wages and Turnover on Security and Safety in Airports: A Review of the Literature," *supra* note 4.
- 187 Ken Jacobs. *Labor standards and airport safety and security*, *supra* note 5.
- 188 Port of Seattle, "Minimum Requirements for Aeronautical Workers with Safety and Security Responsibilities at Seattle-Tacoma International Airport," June 26, 2014. See "6a memo

- overview" attachment. https://meetings.portseattle.org/watch/meeting/2014_07_01_SM2; Ken Jacobs. *Labor standards and airport safety and security*, *supra* note 5 at page 2.
- 189 Ken Jacobs. *Labor standards and airport safety and security*, *supra* note 5 at page 1.
- 190 Ken Jacobs. *Labor standards and airport safety and security*, *supra* note 5.
- 191 Id.
- 192 The Port Authority of New York and New Jersey. "Minutes of the Meeting of the Port Authority Of New York And New Jersey," Board Minutes & Contract Authorizations Portal, September 27, 2018. Page 149. <https://www.panynj.gov/corporate/en/board-meeting-info/board-minutes-contract-authorizations.html>.
- 193 Id.
- 194 The Port Authority of New York and New Jersey. "Port Authority Board of Commissioners Approves Annual Minimum Wage Increases for Airport Workers Tied to Inflation," Port Authority Press Room, December 12, 2024. <https://www.panynj.gov/port-authority/en/press-room/press-release-archives/2024-Press-Releases/port-authority-board-of-commissioners-approves-annual-minimum-wa.html>
- 195 Jay Edwards. "Gov. Murphy, Gov. Hochul and Port Authority of New York and New Jersey announce proposal for annual minimum wage increases for airport workers tied to inflation," WRNJ Radio, November 13, 2024. <https://wrnradio.com/gov-murphy-gov-hochul-and-port-authority-of-new-york-and-new-jersey-announce-proposal-for-annual-minimum-wage-increases-for-airport-workers-tied-to-inflation/>
- 196 Burns, Toros, and Flaming. "Flying Right," *supra* note 14 at page 46.