



Defenders of Highline Forest
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Mr. Steve Rybolt
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To Mr. Rybolt and officials responsible for reviewing the NEPA draft Environmental Assessment (EA) for the Port of Seattle's Sustainable Airport Master Plan's (SAMP) Near-Term Projects (NTP):

As Defenders of Highline Forest, we submit this comment to challenge the conclusion in the draft EA that the 30+ industrial projects proposed in and adjacent to our residential neighborhoods would have no significant impact on human health, air quality, water quality, noise, or ambient heat.

We find that the EA fails to assess or even acknowledge extremely consequential impacts on human health and the environment, and that, therefore, an Environmental Impact Statement (EIS) is necessary. Before detailing our supporting information, we wish to provide relevant context on our standing in this matter.

Defenders of Highline Forest organized in 2021 as *Defenders of North SeaTac Park* to call on the Port of Seattle (Port) to withdraw SAMP proposal L06 which would have replaced 11 acres of forest inside North SeaTac Park with an airport employee parking lot. (1-4)

After we gathered 2,400 petition signatures and reached out to media, the Port withdrew Lot L06 from the SAMP. (5) We then expanded our mission as *Defenders of Highline Forest* to call for protection of all air-purifying and cooling forests in the Highline area, particularly near the airport.

Our Community Forest Consensus calls for permanent protection of the entirety of North SeaTac Park. In addition, in order to safeguard human health in our community, where residents experience high levels of harmful environmental health disparities, the Consensus calls for a moratorium on forest destruction on public land – except as necessary to protect health, safety, or property – within two miles of the airport until there is a plan in place to ensure healthy and adequate tree canopy in this community.

Over 3,750 community members, including 16 elected officials and 61 organizations and businesses, have signed the Consensus. Over 3,200 public signatures, along with hundreds of comments, can be read online (6) and will be sent as an attachment in a separate comment to this EA.

Directly relevant to the EA, the Consensus states that a moratorium on forest removal is necessary to prevent the Port from implementing near term plans that would result in significant reduction of green space and tree coverage.

As for the inadequacy of the EA's determination of significant impact, we see two major categories in which it fails:

I. The EA recognizes only an impact on local traffic, ignoring evidence that clearly supports much wider impacts.

- A. The EA fails to account for the impacts of tree and forest removal from at least five of the proposed near-term projects. Dozens of acres of urban forest would be destroyed, exacerbating existing high levels of ambient air pollution

(because trees provide important air filtering properties), and intensifying “heat island” effects in an area:

1. That is already hotter than surrounding communities;
2. That, according to Port-funded studies, already has sub-par levels of tree canopy; (8-11)
3. Where the local health department has recommended “promoting healthy habitats by creating green spaces, specifically coniferous tree coverage, to capture particulate matter, thereby reducing people’s exposure.”(12)

B. The EA fails to assess appropriately the potentially destructive impacts of the NTPs on salmon-bearing stream habitat, as well as that of birds and other woodland creatures.

Tub Lake bog, one of the last remaining true peat moss bogs in King County, is of particular concern. Several NTPs would bring intensive industrial development right to the edge of this sensitive area filled with wetlands and tributaries of Miller Creek.



This adapted snip from Google maps shows the area around the bog, with labels added indicating the sites for NTPs L05, L07, and S10 (a holding lot, parking structure, and distribution center). These structures and their roads and parking lots would increase impervious surfaces and traffic on the border of the bog, and significantly reduce the buffer of forest around it.

Thinning and fragmenting established forest not only destroys the removed trees but subjects the trees that remain to additional risks from drought, wind, pollution, soil compaction, and other hazards.

C. The EA omits key scientific research necessary to assess the NTPs' impacts on human health and the environment – this research includes:

1. In 2017, a two-year University of Washington study found that “communities underneath and downwind of jets landing at Sea-Tac Airport are exposed to a type of ultrafine particle pollution that is distinctly associated with aircraft...” and noted that “...other studies have linked exposure to ultrafine particles to breast cancer, heart disease, prostate cancer and a variety of lung conditions.”(13)
2. In 2020, in response to Washington State House Bill 1109, Public Health Seattle & King County conducted a study that found that people living within 10 miles of SeaTac Airport, home to a majority of the county's people of color, “face disparities in health, resources, and risk factors compared to the rest of the county.” *(See source cited previously in footnote 12)*

The study further found that “Airport operations result in noise and air pollution, which are linked to many of the health outcomes experienced by airport communities. Noise pollution contributes to hypertension and heart disease and likely causes poor school performance among children. Air pollution impacts numerous organ systems, and multiple pollutants are associated with cardiovascular and respiratory problems. The air pollutants related to airport operations include particulate matter of various sizes, ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur oxides (SO_x), and other hazardous air

pollutants. Fine particulate matter (PM2.5) causes cardiovascular and respiratory problems, and likely causes cancer and central nervous system conditions, including dementia and neurodegeneration.” (See source cited previously in footnote 12)

After the study’s publication, the Port commissioned a consultant to prepare a report on the study. The Port refused to disclose publicly the contents of the consultant’s report until after it was sued under the Public Records Act. (14) The Port wrote directly to the study’s lead researcher in a June 2021 letter, criticizing the study design and further minimizing its findings. (15)

In 2021, the Healthy Air, Healthy Schools project measured indoor and outdoor air pollution at five schools located within a 7-mile radius of Sea-Tac Airport and within 0.5 miles of an active flight path. The study found that schools near truck routes, aircraft flight paths and high-traffic roadways are at higher risk of indoor air pollution, that landing aircraft contribute significantly to indoor and outdoor ultra-fine particle (UFP) concentrations, and that introducing portable HEPA filter units in school buildings reduced indoor concentrations of UFP by approximately 70%. (16)

In comments published on the UW website, Elena Austin, assistant professor of environmental and occupational health sciences in the UW School of Public Health noted that the Healthy Air, Healthy Schools project measured significant infiltration of UFP in the schools studied and that, when it is not possible to reduce emissions at their source, effective interventions are “critical.” (17)

This prompts us to note that, as effective as they are in classrooms, these HEPA interventions cannot remove UFPs from school playgrounds, parks, or

residential yards. And they are not present in many of the children's homes.

D. The Federal government, State of Washington, and Port spend millions of dollars to mitigate and reduce illness caused by airport noise and pollution. And yet, the EA fails to acknowledge that the NTP proposals, which would make this noise and pollution much worse, would significantly impact residents' health. Recent examples of such public expenditures include:

1. The State's operating and capital budgets, which passed in early 2023, include funds directly targeted toward addressing pollution-related health conditions of near-airport residents.
 - a. The operating budget includes \$1.4 million for the Asthma and Airport Air Quality Intervention Project to "address the disproportionate rates of asthma among children who reside within 10 miles of SeaTac international airport."
 - b. Further demonstrating concern about high levels of UFPs, the Capital budget includes \$400,000 for a project coordinated by the Puget Sound Clean Air Agency, to collect data from two long-term monitors in the airport community.(18)
2. In 2024, the Climate Commitment Act account in the state's supplemental Operating budget provided \$6 million for air quality mitigation equipment to residential, recreational, or educational facilities that will measurably improve air quality in South King County including the provision of high particulate air purifiers designed to mitigate or eliminate UFP or other aviation-related air pollution.
3. A new law also establishes a grant program to repair failed soundproofing for affected homes near the

airport. There is \$1 million in the operating budget, \$2 million in federal dollars, and the Port has allocated \$5 million to fund the grant program.

II. The Cumulative Impacts section leaves out important information on past and future projects, information essential to assess accurately how the NTPs would impact our already overburdened community.

- A. It ignores industrial construction in our community prior to 2017, including the third runway, which reshaped the landscape, filled in multiple wetlands and waterways, destroyed large areas of urban forest, dramatically increased the percentage of paved surfaces, and removed entire neighborhoods.
- B. It ignores the recent and ongoing construction impacts of the Highway 509 Extension to I-5, and the future impacts of that additional freeway which will accommodate more trucking traffic and will bring more air pollution, more noise pollution, and more light pollution.
- C. It ignores the recent significant construction impacts of the Light Rail Extension from Angle Lake Station through SeaTac, Des Moines and Federal Way.
- D. The increase in harmful aviation-related impacts on health from NTPs in our airport-adjacent community would come at a time when all of our communities have been told to increase housing, which would subject even more people to these health risks.

In conclusion, as purveyors of services that generate significant amounts of carbon, how can airports in this century ignore the fact that the world is undergoing cataclysmic climate change? Our planet is at an inflection point, and we must take responsibility for reversing that trend, this includes at every level of government – Ports should not be exempt from that.

Climate-change related illnesses and deaths due to extreme heat are burgeoning worldwide, and the Pacific Northwest has already experienced catastrophic heat domes. Trees significantly reduce ambient temperatures while capturing carbon. Any proposal that would remove large numbers of trees from densely-populated urban areas, as proposed in the Port of Seattle's NTPs, is short-sighted.

As local residents who live and/or work in airport-impacted neighborhoods, and as taxpayers whose money funds both Port operations and the studies of the aviation's impacts on our health and well being, we have reviewed the Environmental Assessment and find it insultingly insufficient and callously irresponsible . We insist on an exhaustive and sincere review of the SAMP and these projects' cumulative impacts *through* the lens of an EIS.

On behalf of all Consensus Signers,

Rick Harwood, Dr. Sandra L. Hunt, Eileen F. Lambert, Stephen Lamphear,
Noemie Maxwell, Barbara McMichael, Andrea O'Ferrall, Clare Parfitt,
Kathleen Richardson

Members of the Defenders of Highline Forest Steering Committee

cc: Senator Maria Cantwell
Senator Patty Murray
Representative Pramila Jayapal, District 7
Representative Adam Smith, District 9
Port of Seattle Commission President Hamdi Mohamed
Port of Seattle Commission Vice-President Toshiko Hasegawa
Port of Seattle Commissioner Ryan Calkins
Port of Seattle Commissioner Ryan Cho
Port of Seattle Commissioner Fred Felleman
King County Councilmember Dave Upthegrove

NOTES

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2. Proposal to pave over SeaTac parkland with a parking lot draws community ire by Melissa Hellman, Seattle Times, 7/12/2021
3. Petition requests Port withdraw proposal for new parking lot at North SeaTac Park, SeaTac Blog 7/12/2021
4. Port of Seattle's Plan to Build 1,500 Slot Parking Lot inside a Park Getting Strong Opposition by Patrick Robinson, Westside Seattle 6/22/2021
5. Project in North SeaTac Park Removed from SAMP, Port of Seattle 8/25/21
6. Defenders of Highline Forest Community Forest Consensus, Accessed at <https://DefendersofHighlineForest.org/consensus>
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8. King County's 30-Year Forest Plan, February, 2021, documents that SeaTac has one of the lowest tree canopy percentages in the county (page 17)
<https://your.kingcounty.gov/dnrp/library/water-and-land/forestry/30-year-forest-plan/30-year-forest-plan-03-2021.pdf>
9. Green SeaTac Urban Forest Enhancement Guide, Forterra, City of SeaTac, Port of Seattle, 2019. Tree canopy cover for the City of SeaTac estimated at 21% for the entire city and 25% not including the airport, (p. 14). Accessed at:
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13. Mobile ObserVations of Ultrafine Particles: The MOV-UP study, University of Washington School of Public Health website, accessed at <https://deohs.washington.edu/mov-up> on 12/9/24.
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<https://drive.google.com/drive/u/0/folders/10KRm9LMmKRD5UOr2zeFM7V72DWuE5QJU>
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17. Air pollution from planes, roads infiltrates schools and can be dramatically reduced with portable air filters, February 1, 2022, by Jake Ellison for UW News
<https://urban.uw.edu/news/air-pollution-from-planes-roads-infiltrates-schools-and-can-be-dramatically-reduced-with-portable-air-filters/>
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