

January 5, 2024

Re: Community Input on Port of Seattle Draft Final Land Stewardship Plan

Dear Port of Seattle Aviation Environmental Information Officials, Executive Director Metruck, Commission President Cho, Vice President Mohamed, Commissioners Calkins, Felleman, and Hasegawa,

Having reviewed the Port's Draft Final Land Stewardship Plan<sup>1</sup> (LSP), dated November 2023 section by section, line by line, I am writing to share my feedback on both the scope and the substance of this new plan in light of the five Land Stewardship Principles adopted last summer by the Port. I have taken this approach because it is imperative that our Port Commissioners adopt a Land Stewardship Plan that is equitable, community-centered, environmentally sound, comprehensive, holistic, and, thus, aligned with the adopted principles.

This is important work because:

1. Our elected Port Commissioners adopted these principles in order to direct Port Departments, managers, decision-makers, and their staff (i.e., "Port Actors") to apply an equity and environmental justice lens to their land stewardship with the goal of improving lives of airport neighbors who have been historically underserved and marginalized.
2. Port Commissioners and Port Actors are being directed to use this plan to address the environmental disparities their past actions have exacerbated between those who are advantaged (economically and otherwise) and those who have disproportionately borne the negative health, safety, and economic consequences of living around the airport.
3. The Land Stewardship Principles, as will be operationalized in an equitable Land Stewardship Plan, must be used to hold Port Actors accountable to operate, plan and develop Port land in a way that improves the environment and the lives of community members living around the airport.

To support Port Actor review and use of enclosed feedback, I have indicated the document section and page ranges I am referring to and then included portions of the text in italics or section headings of the LSP and/or page numbers (where applicable) for each of my comments.

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### **Executive Summary p. ES 1-ES 9**

Feedback (p. ES-1): I wish to commend Port Commissioners on their recent adoption of *Environmental Land Stewardship Principles* and the work that has gone into the development of the *Draft Final Land Stewardship Plan*. In clear language, the Executive Summary lays out that the aim of this document is to

impact “*decision-making processes for planning, operations, and capital development*” This intention is responsive to needs that members of the surrounding community have been expressing for many years. Furthermore, the Executive Summary makes clear who will be using this document (the staff who are making land use decisions), the scope (Port-wide for all land use groups), the application (*stewardship of trees, forest, and other habitat--might some mention of water features be included here?*), and the Commissioners expected outcomes (*maximum ecological and community benefit in balance with development and operational needs*). Further feedback on this last point is included below.

(p. ES-1) *The LSP objectives and goals comprehensively apply the Principles to existing SEA projects and programs.*

Feedback: This statement seems rather sweeping and incongruous with the fact that the land stewardship of MU 1 is being ignored and community concerns about wooded areas controlled by the Port in and around North SeaTac Park are not addressed. Further feedback on these omissions is included below.

(p. ES-2) Objectives and Select actions to achieve Objectives 1-4

Feedback: In general, given the historical lack of social and environmental justice practiced by institutions including the Port, weaving equity practices into all four objectives and seeing one or more actions that support equity listed under each Objective (not only Obj. 4) would demonstrate that the Port is committed to equity and addressing past harms to the community and the environment as well as current climate issues. Port Equity staff could help develop meaningful equity goals for each objective or could meaningfully employ community partnership for that. Further feedback on specific Objectives is included below.

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## Document Introduction p. 1-15

### 1 Introduction (p. 1)

*To further its environmental and sustainability goals, the Port of Seattle (Port) seeks to **formalize and improve land stewardship to balance the benefits to the environment and communities with the airport operations and associated development that provides jobs and drives the regional economy.***

Feedback: The bolded section is implying that Port Actors have not considered environmental and community benefits as part of airport operations and development in the past. As such, to make up for this historical imbalance, this section should pledge that Port Equity Policies will be used to do more to address the historical environmental

degradation Port actions and inactions have caused. Ultimately, is the point of the LSP to balance the benefits with or against Port growth or will this plan provide community and environmental benefits to offset the health, noise, pollution, reduced property values and other historical costs to those living near the airport?

1.1 (p. 1) *For the purposes of this document, land stewardship is defined as the responsible use and protection of the natural environment through **conservation and sustainable practices** to enhance ecosystem resilience and human well-being (Chapin et al. 2010).*

Feedback: Port Actors need to be encouraged to go beyond conservation and sustainability. Conservation implies that a valuable thing should not be lost, reduced, or wasted. Sustainability also implies the maintenance of a system. Given the efforts that Port Actors will need to take (and are hopefully committing to in the LSP) to halt the degradation of habitats on land controlled by the Port, I encourage the definition be revised (or another one located) to include the concept of **restoration** (which implies Port Actors will be repairing, upgrading, and overcoming the neglect of the environment).

*(p. 1) Other site attributes associated with land use, community, and economic resources are considered in the context of strategic alignment with Port policies, guidelines and processes for planning, operations, and development.*

Feedback: I am concerned that Port Actors planning and developing Port land (e.g., those charged with implementing current and future SAMP, RESP, and related plans) can be selective in terms of site attributes to prioritize. There is no indication that Port Actors need to prioritize equity, environmental, and community-based site attributes. All the LSP requires is that Port Actors show they "considered" them. With the Equity Policies in place, we need Port Actors to be held to certain standards when selecting and considering site attributes.

*(p. 2) The LSP proposes to manage trees, forest, and other habitat, including streams, wetlands, and their protective buffers. (p. 2)*

Feedback: Given in more than one place in this document, the Port suggests that its Actors are already engaged in Land Stewardship, can more explanation be provided here for how that will look different with a LSP in place? More could be done to call out that management decisions will be based on Port Equity and Climate Policies. Port Actors' Land Stewardship practices should and must look different than they do now, and this plan must make that clear to Port Actors and members of the community. (For illustrative purposes, the sentence could read: *...The LSP proposes to comprehensively and holistically manage trees etc....protective buffers "in ways that reduce environmental degradation, improve local ecosystems, and enhance the health of people living and working on and near Port property."*)

*(P. 2) The LSP is intended to implement the environmental policy for programs related to habitat management while also integrating the policy into planning and operations.*



Feedback: **development** is mentioned above, can it be included here?

(P. 2-3) *This includes balancing environmental considerations with economic and social policy as well as operational requirements.*

Feedback: Could you make it clearer that the LSP requires greater intentionality to the work being done...for example *"This includes **intentionally** balancing environmental considerations...."*

Line 2 (p. 3)

Feedback: replace **For example** with **In this way...."**

(P. 3)...*For example, the LSP supports and enables economic development required to support SEA operations, **uses equity as a tool for prioritizing actions, recognizes the impact** of SEA operations on surrounding communities, provides a transparent view of SEA natural resources extent and condition, and seeks to inform and improve on the substantial land stewardship work already being accomplished through existing programs.*

*The plan is a mechanism to support operations and development while exceeding minimum regulatory requirements and **can** inform master planning and real estate development planning to prioritize locations for development and land stewardship.*

Feedback: I applaud the fact that equity is a tool for prioritizing actions. As such, I encourage reviewers to read through the document to ensure that instances where equity is mentioned, it is being prioritized (and not being placed third or fourth on the list of decision-making criteria). And where it is applicable (i.e., in places where it is clear Port Actors are being asked to make decisions regarding operations, planning, and development), that related Port Equity principles/practices/policies are referenced and called to the forefront as the priority.

Feedback: I encourage reviewers to read through the document and remove words like **recognize the impact, consider** and **can** in order to replace them with action words like **use, address, document, prioritize, will, etc.** This will help clarify what land stewardship actions this plan is committing the Port to practice.

Feedback: In applicable parts of the plan, can the measurement of progress goals be more specific than "periodic"? Possibly sub-bullets with intervals (e.g., monthly, quarterly, annually, etc.) that align with what is listed might be helpful.

#### **1.4 Creating the Land Stewardship Plan (p. 9)**

Feedback: In the first paragraph, can relevant Port Equity Policy be referenced and highlighted in the same manner as other Port initiatives are referenced (e.g., Century Agenda, and the LSP principles)?



If possible, can descriptions under the objectives provide examples of how Port Actors will use the LSP to carry out operations, planning and/or development in different ways.

### **Objective 1 Inventory of Resources**

Feedback: Please go beyond just documenting achievements but clearly direct Port Actors to document changes, gaps or shortcomings in planning and implementation that the environment, the community or Port workers experience over time. For example, it is unclear whether this plan would ensure that in five years the Port would report where/if "heat islands" have increased in number or intensity in the neighborhoods surrounding the airport.

Feedback: In looking at the goals and attached MU maps, can you clarify whether the Benchmark conditions/features of a given habitat will be eventually recorded in terms of not only what is present but what is absent (in terms of what a healthy ecosystem on a specific MU would contain)? Can this plan specify that an "ideal" habitat or ecosystem for each MU (or habitat type?) will be identified and worked towards over time?

Feedback: Can it be made clear how are Port Actors will be using the inventory for current and future goal setting related to **restoration** (see above) and not just conservation and ideally for those who are in charge of setting operational, planning, and development goals on each MU?

Feedback: Organizational planning and goal setting should result in specific goal(s) that address equity issues as part of achieving all objectives. (For example can 1c be carried out in a manner that reflects specific Port Equity Policy(ies) and supports environment justice for the community.)

### **Objective 2 Protect and Restore Habitat**

Feedback: I have concerns about the goal of protecting 50 trees annually given you have only completed the significant tree survey for the west side of the airport. Until the survey is complete (which is the end of 2025) how do you know 50 is the right number? Should the goal be written as a percent?

Feedback: How are you determining how many trees are saved from invasive species? The documentation, planning, and goals for this section seem to need the most work or much more substantive rationale and background with footnotes to the science behind the choices Port Actors will be making around saving significant (high value) trees.

Feedback: We should see specific goal(s) that address equity issues as part of achieving this objective.

### **Objective 3 Connect and Expand Existing Habitat**

Feedback: We should see specific goal(s) that address equity issues as part of achieving this objective.

#### **Objective 4 Offset impacts on habitat**

Feedback: For this Objective, Port Actors would benefit from specific goal(s) that address equity issues in order to achieve the objective.

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### **Land Stewardship Plan Baseline p. 29-45**

#### **SEA Equity Index (p. 42)**

Feedback: If the measures that inform your equity index decline over time, in your light blue areas, how will you represent that on the map? Are you committed to transparency of reporting that? Will you share whether and how you plan to report out on changes (both improvements and degradations)?

#### **Urban Heat Islands (p. 43)**

Feedback: How are you taking into account the impact of future projects on the measurement of heat (i.e., such as the removal of trees south of the airport) in your prioritization of mitigation if you are not including those projects in this plan? Does that mean those neighborhoods are being doubly impacted (by NO ACTION in terms of not being eligible for Land Stewardship consideration while also suffering the removal of life sustaining forests?)

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### **Stewardship Recommendations by Management Unit p. 46-55**

Feedback: You have heard from members of Defenders of the Highline Forest that the Land Steward Plan "must be considered in the context of proposals in your agency's Sustainable Airport Master Plan (SAMP) and Real Estate Strategic Plan (RESP), as well as past actions by your agency that have replaced large areas of forest near the airport with polluting structures and activities." I reiterate that here.

Feedback: Will land stewardship will be practiced on MU 1 in Des Moines? (This is the area south of the airport where the most trees have been, are being, and will be lost over this decade to the Port, Sound Transit, and WADOT.) It has been very challenging to track all the maneuvering that was done in the name of progress. It is also challenging for community members to not interpret the removal of **future projects** as a move that goes against your principles and practices of transparency. Can projects not yet started be part of the inventory? Is there no way to save any of the significant trees? Documentation of the loss of significant trees in MU1 should at least be part of Objective 4 (e.g., how many significant trees are being removed by these projects) in terms of what is being done to mitigate the devastation.

Feedback: The area between SR 518 and North SeaTac Park is very complex. (MUs 22, 23, 24, 26, 32, 33, 44) I see the accompanying maps for each MU as a solid foundation for the LSP. I encourage you to commit as part of the equity work to study these MUs with the goal of refining the boundaries and potentially identifying more acreage for restoration.

**Table 8 (p. 54)**

Feedback: I encourage you to make the process clearer for how community will be involved in refining site-based benefit decisions for the MUs once the plan is revised and moving forward.

Feedback: The community needs more explanation as to how the Public Safety and Maintenance areas (dark blue areas) are going to be managed for habitat restoration rather than commercial. This is where equity needs to be prioritized and the Port needs to find ways to further develop land that is already developed.

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**Management Unit Prioritization p. 56-58**

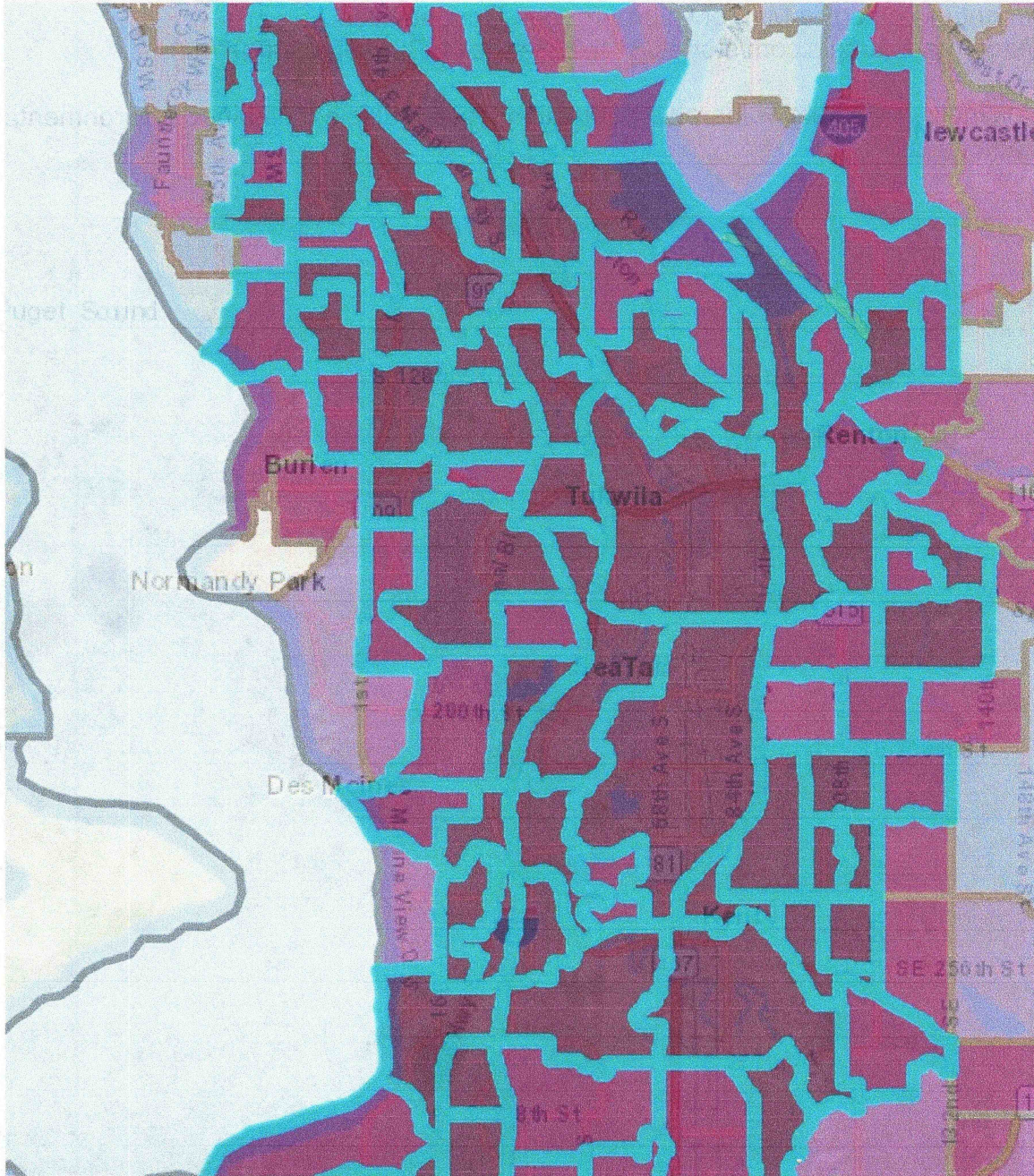
Feedback: Make it much clearer that the Port has only documented the high value trees on the west side of the airport and provide a more specific timeline on when/where the remainder of the significant trees will be mapped. This section is written in a way that unless you are deeply immersed in the text, it is not clear that only a portion of the significant trees the Port controls have been identified. More rationale and explanation in the section would be helpful.

Thank you for extending the comment period.

Sandra L. Hunt, PhD  
Prior President  
Highline Education Association

P.S. pg 56. Edit: MU 46, 24, 42, and 48 (replace the second 46 with 48)



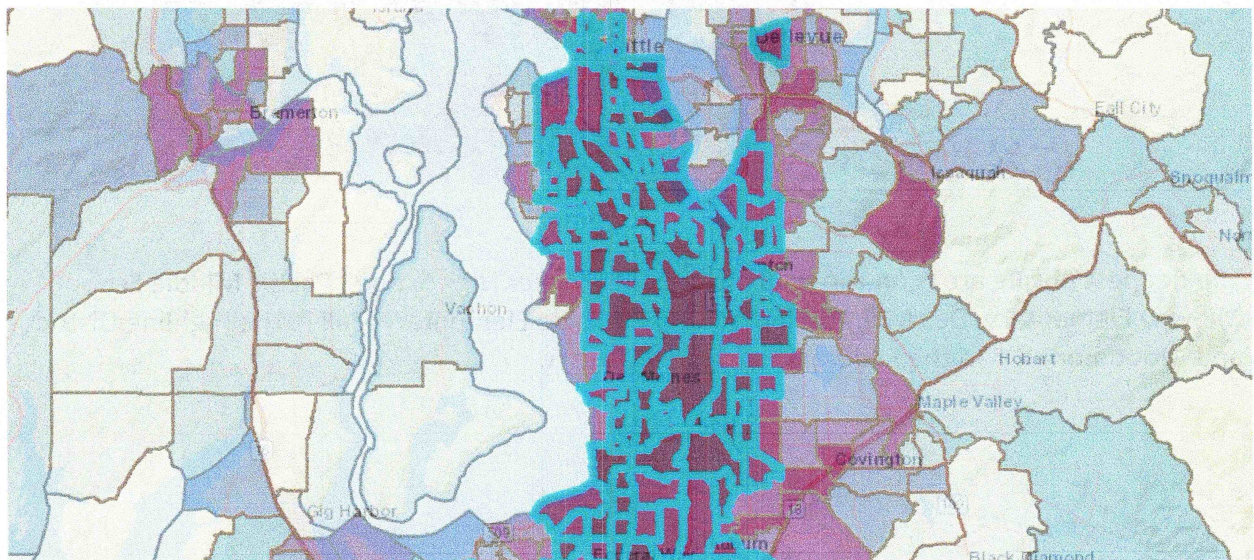
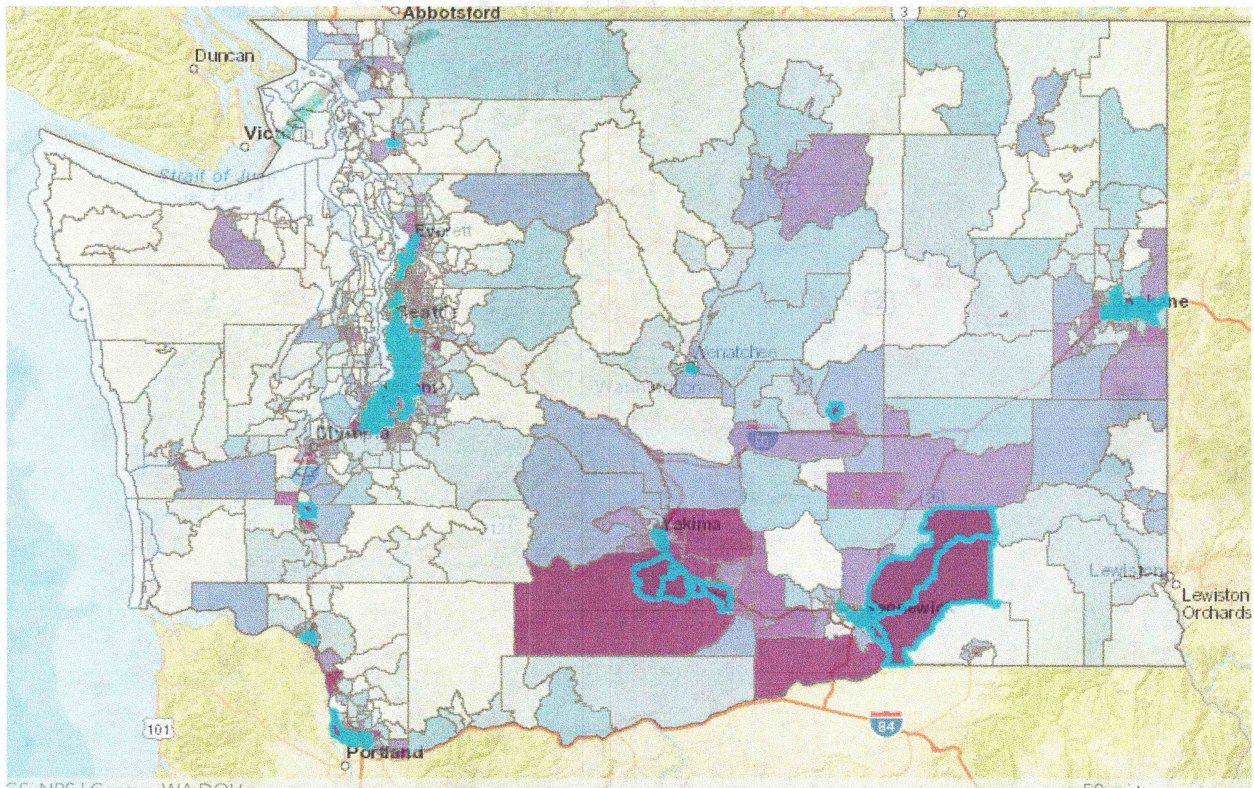


The deepest purple areas on the map include Mt. Rainier High School, Pacific Middle School, Midway Elementary, Des Moines Elementary, Parkside Elementary – all in the Highline District – and Woodmont K-8 in the Federal Way School District.



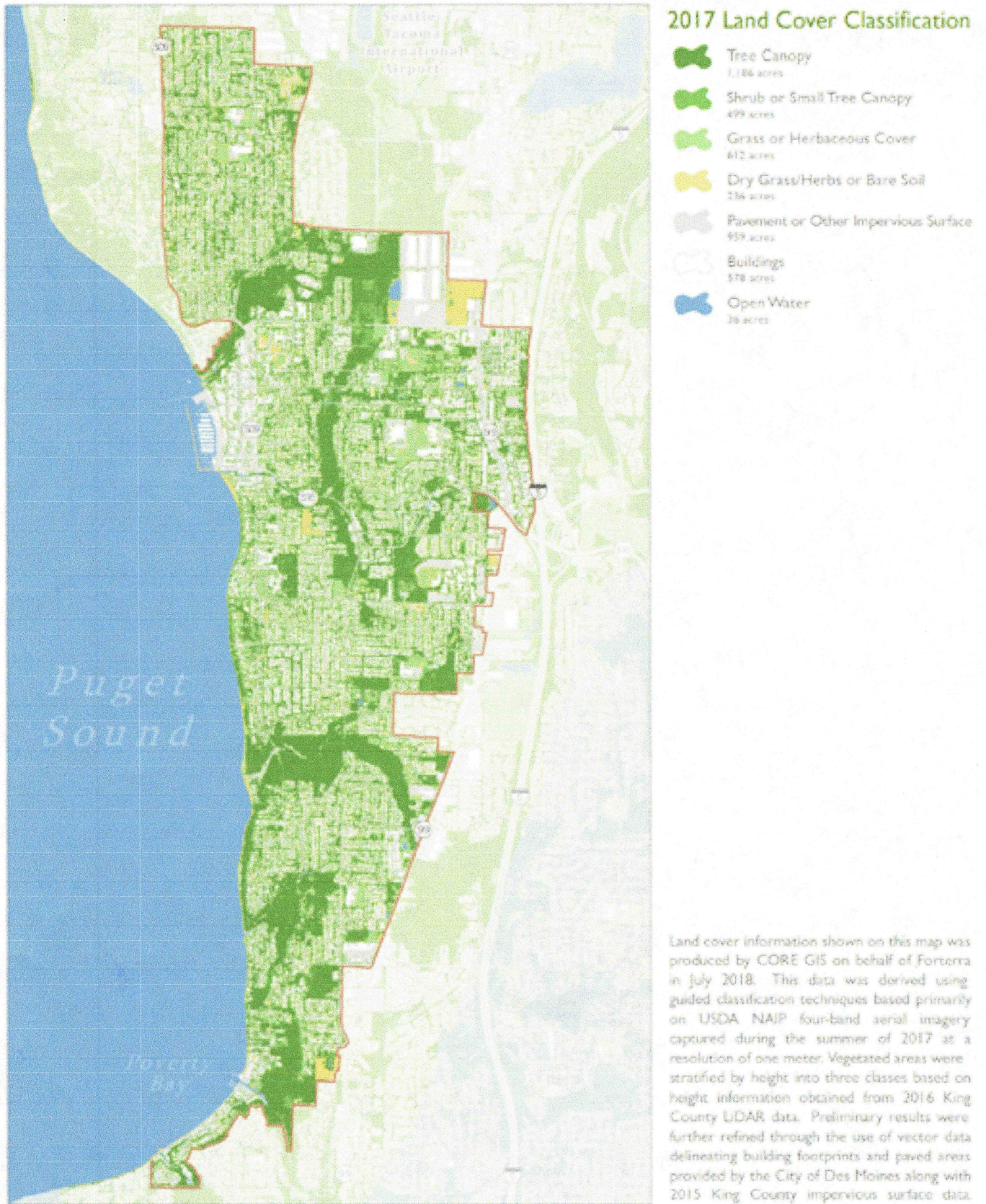
Department of Ecology's Map of Overburdened Communities –  
<https://storymaps.arcgis.com/stories/814b223ee0d14ff38e90feb90f8978d0>

This rank indicates where vulnerable populations face multiple, combined environmental harms and risks.





## Urban Forest Enhancement Plan



Map created by FORTERRA in partnership with the City of Des Moines with support from the Port of Seattle Airport Community Ecology (ACE) Fund.

Land cover information shown on this map was produced by CORE GIS on behalf of Forterra in July 2018. This data was derived using guided classification techniques based primarily on USDA NAIP four-band aerial imagery captured during the summer of 2017 at a resolution of one meter. Vegetated areas were stratified by height into three classes based on height information obtained from 2016 King County LIDAR data. Preliminary results were further refined through the use of vector data delineating building footprints and paved areas provided by the City of Des Moines along with 2015 King County impervious surface data.

**Figure 5: Map of Des Moines's canopy cover in 2017**