



July 22, 2024

To: Ms. Laura Techico, Acting SEPA Official, City of Des Moines  
From: Defenders of Highline Forest and Des Moines Community Members

Re: Mitigated Determination of Nonsignificance for Des Moines Creek Business Park West

Dear Ms. Techico:

Our group, Defenders of Highline Forest, advocates for the preservation and augmentation of tree canopy throughout the Highline area. We expect that you already are aware that our area has been identified by the Washington Environmental Health Disparities Map as suffering from some of the most negative environmental health impacts anywhere in the state.

Back in 2017, when ForTerra conducted a tree canopy assessment for the City of Des Moines, it found that the city had only 29% tree canopy, far below the recommended healthy level of 40% tree canopy for cities in the Puget Sound region. Unfortunately, much more development-associated tree canopy loss has taken place in Des Moines since then. The City is in dire need of environmental reparations and cannot take any more tree canopy loss lightly.

That is why we are writing to push back – emphatically – against the Mitigated Determination of Nonsignificance that you, as the Acting SEPA Official for the City of Des Moines, signed off on with regard to the Panattoni Development Corporation’s proposed Des Moines Creek Business Park West development.

That current open space once was intended to be developed as a woodland park connecting the Des Moines Creek Trail with the Miller Creek Trail. To convert it instead into a commercial development that would include a 400,000+ square foot industrial warehouse and a 400-stall parking lot for vehicles and trailers, and that would bring in an estimated 868 average vehicular (trucking) trips a day on surrounding roadways – how can those massive impacts of noise and air pollution in any way be considered environmentally “nonsignificant” to the Des Moines citizens living in the residential neighborhoods to the west and south of that acreage, and to those recreationalists – hikers, dog-walkers, runners, etc. – who use the trail connecting South 216th Street to the Des Moines Creek Trail?

How can anyone think that the removal of 836,000 square feet of vegetation including native

trees and shrubs such as bigleaf maple, red alder, Douglas fir, western red cedar, Oregon ash, black locust, osoberry, skunk cabbage, and western sword fern will be of no consequence to either the local people or the local wildlife? It is utterly out-of-touch for this environmental protection document to refer so dismissively to our intrepid wild creatures (including owls and pileated woodpeckers), struggling to maintain their lives in shrinking habitat, as “typical urban and disturbance tolerant birds and mammals.”

We believe the additional items in the determination of nonsignificance that mention the re-engineering of wetlands and streams will be disruptive to the efforts of local stream stewards and volunteers who have worked so hard for years to restore Des Moines Creek’s salmon runs. The development plan also will eliminate habitat for amphibian and reptile populations.

In this era of increased climate challenges, and a possible collapse, our Des Moines community should not sacrifice a recovering forest system, its restorative green spaces, and our own physical and emotional health for just another mega-warehouse.

For all of the reasons mentioned above, we are challenging this nonsignificance determination, and we cite Des Moines Municipal Code 16.05.310 (4)(a)(i, ii, and iii) and 16.05.310(4)(e) as the basis for doing so.

Sincerely,

The Defenders of Highline Forest (<https://www.defendersofhighlineforest.org/>), represented by:

Rick Harwood  
Dr. Sandra Hunt  
Stephen Lamphear  
Barbara McMichael  
Kate Richardson

And the undersigned community members:

Meghan Alexander, 22322 6th Avenue S, Des Moines  
Dan and Joann Bynum, 22806 Thunderbird Drive, Des Moines  
John and Nancy Corr, 816 S 216th Street, Des Moines  
Benjamin Folgers, local educator  
Amy and Roy France, 1719 S 232nd Street, Des Moines  
Lauren Frederick, Des Moines  
Heinz Gelhaar, 23600 Marine View Drive S, Des Moines  
Doreen Harper, 26625 16th Avenue S, Des Moines  
Gerrie Kawabata, Des Moines  
Anne Kroeker and Richard Leeds, 27915 10<sup>th</sup> Avenue S, Des Moines  
Jenn Kropack, 22027 6th Avenue S, #306, Des Moines  
Courtney and Joe Lemus, 1152 S 220th Street, Des Moines  
Lloyd Lytle, Jr., Des Moines  
Maureen Massey, Des Moines

Carol Mohler, 807 S 218th Street, #G101, Des Moines  
Michael Stein-Ross, local educator  
Liz Taylor, Des Moines  
Dan Wend and Henry Wend, 22810 Thunderbird Drive, Des Moines

cc: Des Moines City Councilmembers  
Acting City Manager Tim George