



September 8, 2026

Office of Housing
700 5th Ave, Suite 5700
Seattle, WA 98104
Submitted electronically via OFH_Comments@seattle.gov

RE: Fort Lawton Redevelopment Plan Draft Supplemental Environmental Impact Statement

Dear Office of Housing:

Birds Connect Seattle is a 110-year-old environmental education and conservation organization. Our mission is to advocate and organize for cities where people and birds thrive. In line with our mission, **we write in support of Alternative 1 and provide additional context, data, and recommendations to strengthen the characterization of current site conditions at Fort Lawton and mitigation measures for the proposed redevelopment.**

A note about our past advocacy at Fort Lawton and why we support Alternative 1

In 1970, our organization—then operating as the Seattle Audubon Society—strongly advocated for developing a public park on the surplus military land at Fort Lawton. Our representatives served on Mayor Uhlman’s Fort Lawton Citizens’ Advisory Committee. The park for which we advocated became Discovery Park, now Seattle’s largest and most biodiverse park. Today, we benefit enormously from that outcome: already this year, we have organized more than 150 outings and bird counts at Discovery Park.

But in advocating for a city park, we opposed the efforts of Indigenous leaders Bernie Whitebear, Ella Aquino, Sid Mills, Romana Bennett, and others, who occupied Fort Lawton for weeks to assert Native claim to the land and envisioned the site as a place for Native housing, culture, and science (UIOAT, 1970).

We acknowledge that our past advocacy contributed to the ongoing colonization and dispossession of Indigenous land—to our benefit—and helped deny significant opportunities to urban Indigenous communities. We therefore strongly support Alternative 1 as the only proposal that moves toward the long-held dream of affordable Native housing at Fort Lawton that our organization previously helped defer.

The Draft SEIS makes clear that Alternative 2—development of passive park uses and retention of an existing park maintenance facility at Fort Lawton, combined with development of 500 units of affordable and homeless housing at the Stone Way N site in North Seattle—would have lower environmental impacts and greater potential for enhancing wildlife habitat. However, the mission of Birds Connect Seattle is to help create cities where *people* and birds thrive.

Alternative 2 would perpetuate a longstanding pattern in which affordable and supportive housing is concentrated in communities with fewer environmental amenities and greater health and social disadvantages. The census tract containing the Stone Way N site is ranked most disadvantaged in the City's Health Disadvantage Index and second-most disadvantaged on both the Racial and Social Equity Index and the Race, English Learners, and Origins Index (OPCD, 2023). It also scores below the citywide average on the American Forests Tree Equity Score, particularly on the heat disparity dimension; the area is approximately 10.2°F warmer than the region average (American Forests, 2023).

In contrast, the census tract containing the Fort Lawton site shows substantially greater environmental and health advantages, ranking much higher across the City's racial, social, and environmental indicators (OPCD, 2023), and receiving a perfect score of 100 on American Forests' Tree Equity Score (American Forests, 2023).

Access to nature, wildlife, and other environmental amenities has significant benefits for human health and well-being, yet these benefits are distributed inequitably and are more readily available to people with greater means. Alternative 2 would reinforce this pattern by placing affordable and supportive housing in a community with substantially greater environmental burdens while enhancing access to exceptional natural amenities for a community that already enjoys them.

Achieving our mission and living our values requires more than minimizing environmental impacts. We must also ensure that the benefits of birds, healthy environments, and access to green space are equitably distributed. For this reason, we support the alternative that provides affordable housing at Fort Lawton while also investing in the environmental health and resilience of communities that have historically borne greater environmental burdens.

Specific Comments and Recommendations on the Draft SEIS

Section 3.2.1: Affected Environment: Fort Lawton Site: Fish and Wildlife

The Fish and Wildlife section on page 3-22 discusses habitat quality and connectivity at the Fort Lawton site. Ecological connectivity is highly species-specific. For some migratory bird species, connectivity may extend across the entire Western Hemisphere. For most of our local bird species, movement between habitat patches within an urban landscape is relatively unimpeded, particularly where canopy cover in the surrounding urban matrix is high. **We therefore recommend revising the paragraph on page 3-22 to read:**

"The remaining forested habitat patches in the Fort Lawton site serve as valuable wildlife refuges in an otherwise urban landscape. The proximity and connectivity to nearby forested city parks ~~are~~ also likely allow for increased diversity of occupying wildlife, compared to otherwise isolated patches. However, when viewed at a larger scale, these forested areas are highly fragmented and isolated, ~~((lacking habitat connectivity to other local or regional terrestrial habitat areas.))~~ and ~~((Existing))~~ existing wildlife impassable

fencing on the Fort Lawton site restricts movement of less mobile (e.g., flightless) terrestrial wildlife species between on- and offsite areas.”

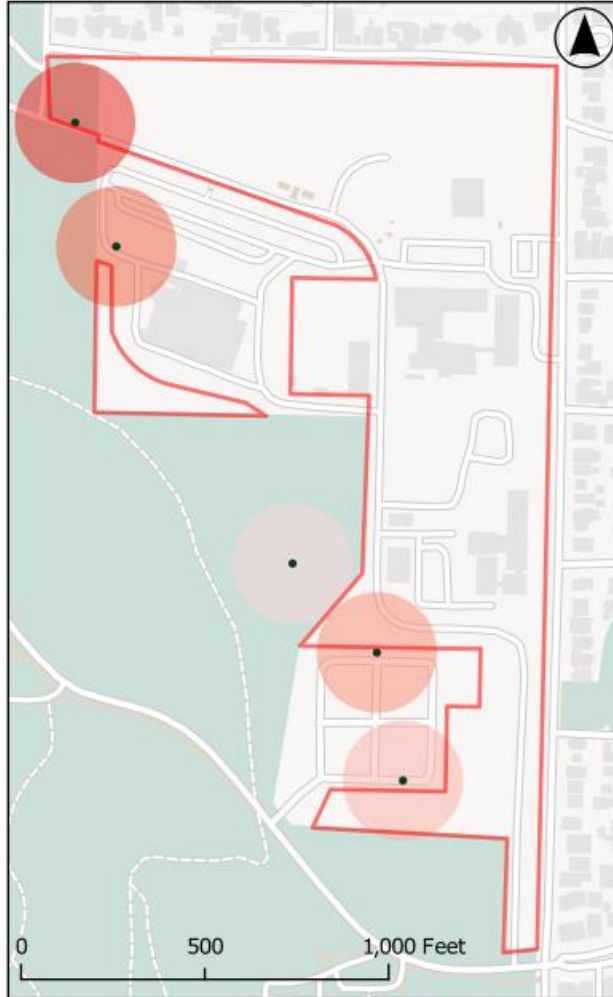
The bird surveys conducted at the Fort Lawton site in winter 2004, as well as the breeding-season point-count surveys conducted by the U.S. Army Reserve, may provide an incomplete or outdated picture of the current avian community in and around the Fort Lawton site. Birds Connect Seattle conducted 294 point-count surveys at five sampling stations near the Fort Lawton site on 63 unique occasions between February 2, 2015 and July 1, 2023. During this period, we recorded at least 63 species; 99.8% of all observations and individuals recorded were of native species. Avian species richness and abundance are highest toward the northwestern portion of the site (Figure 1). The raw data are attached for reference, additional data and metadata are available upon request, and data-collection methods are described in Morris (2026a). **We recommend updating the description of avifauna on page 3-22 to incorporate this more complete and recent information on the bird community in and around the Fort Lawton site.**

Although the survey data from bird point counts nearest the Fort Lawton redevelopment site were not included in the analysis, it is still relevant to consider the results from our analysis of long-term bird-count trends at Discovery Park. From 2005 to 2023, species richness at Discovery Park fell by 23%, and the average number of birds reported per survey fell by 25% (Morris, 2026a). Both declines were statistically significant and greater in magnitude than project-wide results. Although some of the decline reflects fewer observations of introduced species such as House Sparrows and European Starlings, most of the decline occurred among native species. **These results raise concerns about the capacity of Seattle’s parks to support diverse and abundant bird communities and make habitat enhancement and mitigation of hazards associated with redevelopment all the more important.**

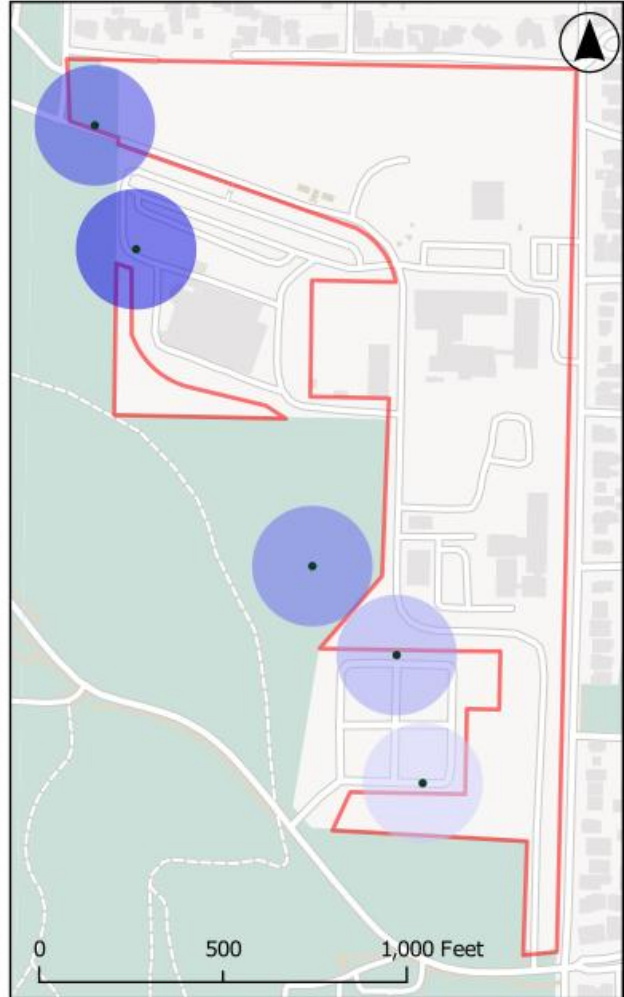
AVIAN SPECIES RICHNESS AND ABUNDANCE

Neighborhood Bird Project near the Fort Lawton Redevelopment Site, 2015 to 2023

A: Cumulative Species Richness



B: Mean Bird Abundance per Survey



LEGEND

Cumulative Species Richness

39 51

Fort Lawton Site Boundary

Map by Birds Connect Seattle, Sept. 2026.
Data: Birds Connect Seattle, King County,
City of Seattle, National Audubon Society.

Mean Bird Abundance per Survey

10 13

Bird Point Count Station Center

Figure 1: Cumulative species richness and mean bird abundance per survey from Neighborhood Bird Project point counts between February 2015 and July 2023.

Our analysis of bird-count trends at Discovery Park found that counts of Band-tailed Pigeon (*Patagioenas fasciata*)—a WDFW priority species that we have also detected in the vicinity of the Fort Lawton site—declined by more than 50% between 2005 and 2023 (Morris, 2026a). Little is known about potential drivers of this decline (Keppie & Braun, 2020), but Band-tailed Pigeons have been documented in window collisions (Acopian Center for Ornithology, 2026; iNaturalist, 2026). **We therefore consider the species’ concerning local decline and documented vulnerability to window collisions a strong rationale for robust bird-window collision mitigation measures as part of the redevelopment project.**

Alternative 1 – Mixed Income Affordable Housing and Public Park Uses (Updated Proposed Action) > Effects on Biological Resources > Operational Impacts

This discussion starting on page 3-27 characterizes operational impacts on biological resources as “indirect.” In fact, operational impacts can have both direct and indirect effects on biological resources. Windows directly kill birds; outdoor cats directly kill birds and can indirectly reduce the prey base available to native predators; pesticides can directly kill insects and indirectly reduce the prey base for insectivorous wildlife; and increased human activity can directly increase off-trail use and disturbance. **We recommend revising this discussion to characterize operational impacts as having both direct and indirect effects on biological resources and to consider increased off-trail use and dog presence as additional anticipated operational impacts.**

3.2.3 Mitigation Measures

Because the Fort Lawton site is directly adjacent to the most biodiverse unit in the Seattle park system, we consider mitigation of operational impacts to wildlife critical to this project. In addition to the measures proposed as part of the project, we strongly urge the project to implement the following mitigation measures:

- **Reduce risk of bird-window collisions.** Large structures in areas of low structural density with extensive lawns—as proposed for this project—have been found to pose particularly high risks of bird-window collisions (Hager et al., 2017). We therefore believe collision risk reduction for this project at the Fort Lawton site to be imperative. To this end, the project should:
 - **Reduce collision risk through building design.** Reduce the overall surface area of glass; avoid transparent or reflective glass corners; avoid configurations of parallel windows that create “fly-through” illusions; and avoid transparent railings. We recommend reviewing the [Bird-Friendly Campus Design Standards](#) developed by the University of Washington (Bowes, 2024) for guidance on reducing collision risk through building design. Research has also found that alcove-shaped, long, and tall facades tend to have greater collision risk (Riding et al., 2020), so building form should be considered as part of collision-risk reduction.
 - **Use bird-window collision deterrent treatments on reflective and transparent surfaces.** Where reflective or transparent surfaces are necessary,

bird-window collision deterrent treatments should be incorporated—particularly at large expanses of glass and on windows adjacent to high-quality habitat. Options include insect screens, specialty bird-safe glass, exterior markings applied across windows, and cords suspended in front of windows. The American Bird Conservancy's [bird-window collisions solutions handbook](#) (Sheppard, 2024) provides guidance on effective approaches, and its [Glass Collisions Products](#) database provides information on collision-prevention materials and products.

- **Reduce impacts from companion animals.** Increased human presence will likely increase the density and intensity of companion-animal use in and around the site. Cats can take a substantial toll on birds, amphibians, and other native wildlife (Loss et al., 2013), and off-leash dogs are increasingly recognized as having significant implications for wildlife conservation (Bateman & Gilson, 2025). Therefore, management of both cats and dogs should be considered.
 - **Include individual or shared “catio” spaces.** Catio is an outdoor enclosure that provides cats with outdoor stimulation while reducing risks to both cats and wildlife. Incorporating catios as project amenities would make it easier for residents to provide outdoor access for cats in ways that minimize impacts on wildlife. See [catiospaces.com](#) for Seattle’s local catio expert.
 - **Establish expectations for companion-animal containment.** Operational policies should establish clear expectations that residents keep companion animals—both cats and dogs—contained indoors or on a leash whenever they are outside, except in designated areas where off-leash activity is expressly permitted.
- **Do not use anticoagulant rodenticides.** Anticoagulant rodenticides have infiltrated and are contaminating the local food web. Exposure is widespread among local, non-target birds of prey (Urban Raptor Conservancy, 2023), and secondary poisoning from anticoagulants has been implicated in numerous wildlife deaths (e.g., see Morris, 2026b). Anticoagulant rodenticides are prohibited under Seattle Parks and Recreation’s Integrated Pest Management policy (B. Kelsh, pers. comm, July 17, 2026) and should not be used at the Fort Lawton site.
- **Limit the use of other pesticides and fertilizers.** Pesticides and fertilizers can kill beneficial insects like pollinators, reduce the insect prey base, and contribute to water quality degradation in downstream aquatic systems.
 - **Landscape with native plants.** Native plants can thrive without significant chemical inputs. Native landscaping should be allowed to be “messy.” Allowing dead vegetation to remain in place keeps habitat for overwintering insects and ground foraging birds, reduces disturbance to wildlife, allows natural nutrient cycling to occur, and helps retain soil moisture.
 - **Avoid broadcast application of pesticides and fertilizers.** Broadcast application can result in overapplication and allow chemicals to spread beyond their intended treatment areas through drift, runoff, rainfall, and other pathways. Instead, use

targeted applications and the minimum amount of chemical necessary to achieve the intended effect.

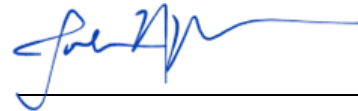
- **Minimize the amount of turf and lawn area and maximize planting with native, climate resilient trees and vegetation.** Non-native, turf grass lawns require high intensity management and do little to support biodiversity or climate resilience objectives. Lawn area should be reduced to the bare minimum or avoided all together. Wherever possible, areas should be planted with native trees and vegetation.

Birds Connect Seattle is always happy to be a resource for our community. Do not hesitate to contact us with questions.

Respectfully,



Claire Catania
Executive Director



Joshua Morris
Conservation Director

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