



TECHNICAL MEMORANDUM

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Date: June 4, 2025

From: Farallon Consulting, LLC dba Grette Associates
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Re: West Bay Yards: Response to Comment Letter from Black Hills Audubon Society

Introduction

This technical memorandum has been prepared in response to the Black Hills Audubon Society (BHAS) comment letter of February 15, 2025, raising concerns about the proposed West Bay Yards development potentially impacting resident and migratory birds within the Pacific Flyway. Specifically, BHAS is requesting that the developer replace the long panels of glass windows and glass balconies with non-glass alternatives to reduce the risk of bird strikes (Comment #1), as well as install perch poles, nesting platforms, and nest boxes to increase habitat features for birds (Comment #2). This memorandum addresses the comments and recommendations discussed in the comment letter by the BHAS.

Response to Comment #1

Bird strike avoidance is not addressed in municipal codes in the Puget Sound region. Review of several local municipal codes found no regulations regarding deterrence of bird strikes on buildings, including the cities of Olympia, Tacoma, Seattle, and Bellevue, along with Thurston, Pierce, and King counties, which are all located within the Pacific Flyway.

To address bird strike mortalities from the proposed development, the Applicant proposes to include a condition of approval requiring monitoring the site post-construction to provide data on the number, species, and specific locations where bird strike mortalities occur. This will allow for a targeted approach to mitigate the risk of bird strikes on the site, should those occur.

The monitoring methodology will involve counting the number of bird mortalities around the perimeter and between the buildings within the development (O'Connell 2001, Uribe-Morfin 2021, Eckart and Taguchi 2023, Loss et al. 2019, USFWS n.d.). Deceased birds will be recorded if they are less than 2 meters away from any windows or balconies (USFWS n.d.), as well as if there are indicators that confirm there was a window/balcony collision (broken bills, blood on beak, etc.) (Uribe-Morfin 2021). Additionally, the location of each deceased bird will be documented to allow for a better understanding of where the bird strikes occurred on the site. The monitoring will be conducted three days each week for one calendar year to ensure all migratory and resident birds present throughout each season are accounted for (O'Connell 2001, Hager et al. 2013, Uribe-Morfin 2021, USFWS n.d.).

After a full year of monitoring is completed and if the data show there is more than 60 bird strike mortalities (Ocampo-Peñuela 2016), the project owner will evaluate measures to prevent bird strikes in the areas with the highest concentration of mortalities. For example, glass treatments have been shown to be effective in reducing bird strikes, as they alert birds and deter them from the glass structures (Klem 2009, USFWS 2020). The treatments could be applied to the glass windows and balconies in the areas exhibiting bird strike mortalities to enable the birds to recognize and avoid the treated glass. Follow on monitoring would be conducted to validate the minimization of mortalities with the glass treatment.

If the results of the initial monitoring show that the development is not causing a significant number of bird strike mortalities, then no action will be taken, and monitoring will be discontinued.

Response to Comment #2

Perch poles, nesting platforms, and nest boxes will be installed within the Vegetation Conservation Area to enhance the habitat for bird species. Additionally, the shoreline restoration plan proposed for this site includes the planting of native trees and shrubs, which will benefit raptors and shore-associated birds. The project owner plans to remove debris and plant saltmarsh and transitional riparian plantings along the top of the shore, thus improving the foraging habitat for birds. With the incorporation of these features, the habitat quality for birds will be greatly improved compared to the current conditions at the site.

References

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