Comments submitted to the Lakewood Planning Commission, May 7, 2025

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I am submitting these comments on behalf of Denver Audubon, a grassroots conservation organization with approximately 3,500 members in the metro area. The organization's mission is to inspire actions that protect birds, other wildlife and their habitats through education, conservation and research.

Our members value Belmar Park for its riparian habitats and wildlife-related recreational values and use the park frequently for birdwatching, an activity enjoyed by approximately 45 million people nationwide.

We find that the development proposed by Kairoi does not comply with the Purposes of the Lakewood Zoning Code at **17.1.2 "To promote the health, safety and welfare of the citizens of the City of Lakewood."** By permitting such a large development right on the edge of the Park, the City is reducing the Park's benefits for the mental, physical and social health of the community. A large body of research by agencies and organizations such as the Trust for Public Lands has described the human health benefits associated with access to natural and biodiverse urban greenspaces, that will be affected here. The increased traffic brought by the addition of 411 dwelling units in the area would add to air pollution and pose another negative stress to human health.

The development does not **implement the vision, goals and recommendations of the City of Lakewood 2025 Comprehensive Plan (**Title 17.1.2 B**).** Kairoi's design would violate the requirements of section L-N2©, page 5 of Chapter 8 of the 2025 Comprehensive Plan to "seamlessly integrate with the neighborhood." A six-story structure immediately adjacent to a Park and to two-story town homes does not fit "seamlessly" into the neighborhood.

The development also does not comply with **Title 17.1.2.C, To Protect and Enhance the Natural Environment including the conservation of natural features, land and energy.**

Removing over 60 mature trees from the site does not conserve natural features. The current design puts the building footprint only 31 feet from some of the Park's riparian habitats. Such habitats form only about 10% of the ecosystems of Colorado but support about 75% of our native flora and fauna, according to the Colorado Division of Parks and Wildlife.

Lakewood has many parks, but the question in this case is: is the park effective? Its effectiveness is reduced by increased noise, light pollution, pets - especially cats - bird strikes on window glass, and general human-caused disturbance. Such impacts have been well documented in peer-reviewed research (see citations at the end of this comment).

. The size of the building, the number of windows, the increased human noise, the lights and general disturbance by hundreds of people have the potential to greatly affect the lives of birds nesting and resting in the Park, including reducing adult and chick survival. Any possible decrease in bird populations there would affect the flora as well, since birds are important pollinators and seed dispersers.

In addition, park-adjacent development has the potential to disrupt human use of a park, by destroying the relative quiet and solitude to be found there also address the benefits to the mental and physical well-being of the people who use it.

Our members are keenly aware of impacts that poorly planned development can have on parks and open space, and we therefore strongly urge you to modify or, better yet, deny the current plans submitted by Kairoi for their proposed development at 777 S. Yarrow St. and require a revised plan that better fits into the area and preserves the special features of Belmar Park.

Citations:

Scott R. Loss et. al. 2014. Bird-Building collisions in the United States: Estimates of annual mortality and species vulnerability. The Condor, Vol. 116, p. 8-23.

Tim S. Doherty et. al. 2016. Invasive Predators and global biodiversity loss.

PNAS Vol. 113, no. 40, 11261-11265.

Jesse R. Barber, Kevin R. Crooks and Kurt M. Fristrup. 2010. The Costs of Chronic Noise Exposure for Terrestrial Organisms. Trends in Ecology and Evolution 25: 180-189.

Scott R. Loss, Tom Will and Peter P. Marra. 2013. The impact of free-ranging domestic cats on wildlife of the United States. Nature Communications 4:1396 doi: 10.1038/ncomms2380 (2012).

Heidi E. Ware et al. 2015. A Phantom Road Experiment Reveals Traffic Noise is an Invisible Source of Habitat Degradation. Proceedings of the National Academy of Sciences USA 112, no. 39: 12105 - 12109.

And there are many more.