



United States  
Department of  
Agriculture

Animal and  
Plant Health  
Inspection  
Service

Animal Damage  
Control

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April 15, 1998

Jonathan Friedman  
U.S. Army Corps of Engineers  
Seattle District  
Federal Office Building, Suite 200  
909 First Avenue  
Seattle WA 98104-1000

Dear Mr. Friedman:

We submitted a formal statement from our agency (see attached) at the public hearing on April 9, 1998 indicating our strong opposition to the establishment of any new wetlands within 10,000 feet of runways at SeaTac. I am writing this follow-up letter to address several issues and concerns that were raised during the hearing. Let me preface my statements by noting that we are neither for nor against the proposed runway expansion or the issuance of a Section 404 permit to fill existing wetlands. While we have not taken a formal position regarding the issuance of a Section 404 permit, it is our opinion that the existing wetlands attract wildlife in a manner that is detrimental to air safety, particularly Canada geese and dabbling ducks. We have been working with SeaTac to reduce wildlife hazards throughout the airfield and have provided them with assistance in the past to preclude waterfowl from utilizing existing wetlands. I want to reemphasize the serious nature of bird strikes - they are real and can result in more than just costly repairs, they can result in loss of human life. A tragic example of this was recently demonstrated in 1995 when a flock of Canada geese brought down an aircraft in Alaska, killing all 24 crew members on board. In situations where there is loss of human life or property, there may be severe legal ramifications and personal liability for personnel that fail to abate hazardous situations involving wildlife.

One recurring theme that was voiced throughout the hearing by supporters of on-site mitigation was that the 10,000-foot separation between airfields and hazardous wildlife attractions (as described in FAA Advisory Circular 150/5200-33) is only a recommendation and is not mandatory. Many of the same presenters also indicated that they did not feel wetlands attract wildlife, nor would they increase the potential for bird strikes at the airfield. This contention is inherently flawed because 1) if birds are not attracted to the wetlands, there would be no need to mitigate in the first place, and 2) it has been demonstrated at airports throughout the world that as the number of animals in the vicinity of an airport increases, the wildlife strike-rates (number of strikes per 10,000 aircraft movements) typically increase. While this relationship between strike-rates and wildlife abundance may not be directly proportional due to the susceptibility of some species to collide with aircraft, it is a general rule. Waterfowl, which are considered one of the most hazardous forms of wildlife throughout the world because of their size, abundance, propensity to flock, and flight characteristics, would inevitably be attracted to new on-site wetlands.



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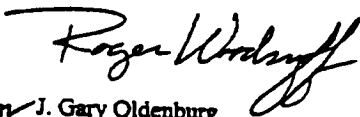
AR 041627

There are many actions that can be taken to decrease wildlife hazards, depending on the species, time of year, why they are using the airfield, habitat characteristics on and around the airfield, and a host of other variables. It is therefore, a necessity to fully understand an animal's biology, particularly in relation to specific environmental characteristics, when establishing a wildlife control program. Because conditions surrounding airfields can vary so dramatically, the FAA intentionally drafted Advisory Circular 150/5200-33 in a manner that provides managers with a degree of latitude and flexibility when dealing with wildlife hazards. For this reason, the Advisory Circular was not made into a regulatory mandate, but rather a series of guidelines developed through years of research and experience in dealing with wildlife-related hazards and their impacts on air safety. While there are circumstances that merit exemption from the 10,000-foot separation, and we do work closely with airports in these situations, we do not feel SeaTac is one of them.

Several presenters stated that despite the current existence of wetlands within 10,000 feet of SeaTac's airfield, there is not a wildlife hazard nor have there been any damaging incidents involving birds in the past. However, a review of historical bird strike records submitted to the FAA by pilots reveals this is not the case. Between March 1991 and September 1997, pilots reported 11 strikes involving waterfowl. This is probably a gross underestimate because pilots report only a small proportion (typically less than 15-20%) of the strikes that actually occur. Several of the waterfowl strikes involved multiple birds, and twice the aircraft was damaged and had to make a precautionary landing. Other species that were involved in strikes at SeaTac within the past 7 years include blackbirds, gulls, starlings, herons, hawks, and sparrows, all of which utilize wetland habitats to varying degrees. Fifty-one of the remaining 99 reported-bird strike incidents involved unidentified species, but it is probable some of these were waterfowl.

We understand many of the concerns raised by proponents of on-site mitigation, but like you, it is our professional responsibility to gather information and weigh all the facts before drawing conclusions, even if our decision is not popular. Our position is based on years of experience and training on issues related to wildlife hazards associated with airport environments, and more importantly, site-specific observations made while dealing with wildlife hazards at SeaTac Airport. While we strongly endorse the wildlife enhancement as a whole, we feel this practice is incompatible with safe aircraft operations and oppose its implementation in such close proximity to the airfield. Whatever your decision, we hope you will consider and incorporate the issue of wildlife hazards in the deliberation process. Thank you for your considering regarding our concerns.

Sincerely,

  
for J. Gary Oldenburg  
State Director, WA/AK/HI/Pacific Islands

Encl Letter submitted by USDA to the U.S. Army Corps of Engineers, April 9, 1998

cc: Harold Handke, Lead Cert. Safety Inspector, FAA  
Michael Linnell, Wildlife Biologist, USDA-WA/AK

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