

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
United States Coast Guard  
Sector Columbia River

2185 SE 12<sup>th</sup> Place  
Warrenton, OR 97146  
Staff Symbol: s  
Phone: (503) 861-6206

October 8, 2020

Warrenton Community Development Department  
Attn: Interim City Planner, Mr. Mark Barnes  
P.O. Box 250  
Warrenton, OR 97146-0250  
[cityplanner@ci.warrenton.or.us](mailto:cityplanner@ci.warrenton.or.us)

Dear Sir,

I am writing in response to the Notice of Public Hearing to express my concern regarding SDR 20-6, a request by The Scouler Company to develop a 14,400 square foot fishmeal processing facility on property owned by the Port of Astoria located on Airport Way in the Airport Industrial Park.

Of primary concern regarding the existence of such a facility is the likelihood that it may attract birds to an area that is located mere hundreds of yards from an active airport, namely, Astoria Regional Airport (KAST), which houses several aviation stakeholders, including the U. S. Coast Guard, thereby introducing avoidable risk in the form of bird hazards to the immediate area.

The military's wildlife hazard control and awareness program is collectively known as the Bird/Wildlife Aircraft Strike Hazard (BASH) program and represents each service's efforts to curtail bird strike hazards through awareness, timely reporting, and hazard control development. The United States military incurs millions of dollars in annual costs and losses due to bird strikes. The Federal Aviation Administration (FAA) reports annually approximately 2,300 wildlife related strikes and the U. S. Air Force, U. S. Navy, and U. S. Marine Corps report an additional combined 3,000 strikes, the latter resulting in excess of \$75 million in damage every year<sup>1</sup>. Over a 20-year period, 31.5% of all Air Force BASH incidents occurred between the surface and 1000 feet above ground level<sup>2</sup>. KAST stakeholder aircraft spend significant amounts of time operating at these altitudes and as such, incur the greatest risk of bird strikes.

The U. S. Coast Guard is fully vested in the economic growth of the greater Astoria/Warrenton area. While this growth has unquestionable benefits for the local population, I am reluctant to provide my support of the initiative outlined in SDR 20-6 without further studies being conducted into the predicted changes of local and migratory bird behavior, assessment of bird strike risk to aircraft, and a collective evaluation of planned bird hazard mitigation strategies.

Thank you for the opportunity to comment on this initiative. I look forward to our continued cooperation.

Sincerely,

A handwritten signature in blue ink that reads "G. M. Bailey".

G. M. Bailey, CAPT  
Deputy Sector Commander  
U. S. Coast Guard

<sup>1</sup> [https://www.cnrc.navy.mil/regions/cnrse/installations/nas\\_kingsville/om/air\\_operations/bash.html](https://www.cnrc.navy.mil/regions/cnrse/installations/nas_kingsville/om/air_operations/bash.html)

<sup>2</sup> <https://www.safety.af.mil/Portals/71/documents/Aviation/BASH%20Statistics/USAF%20Wildlife%20Strikes%20by%20Altitude.pdf>