

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

November 12, 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 Mr. Barnes,

This letter is being submitted for the November 12, 2020 City of Warrenton Planning Commission meeting and addresses my continued concern regarding SDR 20-6, a request by The Scouler Company (hereafter referred to as "applicant") to develop a 14,400 square foot fishmeal processing facility on property owned by the Port of Astoria on Airport Way in the Airport Industrial Park.

Following CAPT Gretchen Bailey's (Deputy Sector Commander) correspondence to you on October 8, 2020, my staff personally met with the applicant at a meeting hosted at Sector Columbia River on October 29, 2020 and participated in another phone conference with the applicant on November 6, 2020. Both meetings included substantial discussion about bird attractants and the applicant's proposed controls to eliminate such attractants. I appreciated the opportunity to participate in both forums, but my initial concerns as outlined in CAPT Bailey's October 8, 2020 letter to you remain unresolved.

My growing concern as an airport tenant, aircraft operator, and aviation safety specialist lies with the disregard of core aviation safety management practices, including the absence of an *unbiased and current* aviation wildlife risk assessment that specifically includes the plans in SDR 20-6, and represents the most tangible and immediate threat to Coast Guard aviation operations. Federal Aviation Administration (FAA) Advisory Circular 150/5200-33C<sup>1</sup> provides guidance on land use (including proposed on/off-airport construction) that have the potential to attract hazardous wildlife on or near airports, and to assess and monitor wildlife risk. The FAA recommends using this guidance in land-use plans and project development for projects either on or near airports, a practice which has not been fully pursued by the Port of Astoria. The circular outlines the functions for assessing wildlife risk, reasons for developing a valid Wildlife Hazard Management Plan (if needed), and further provides significant guidance on other wildlife attractants. A second FAA Advisory Circular (150/5200-38) defines the minimum acceptable standards for conducting Wildlife Hazard Site Visits, Wildlife Hazard Assessments, and preparing Wildlife Hazard Management Plans. Paragraph 1.1.2 states that, "*Airports can also use a Site Visit to decide if a proposed land use in the vicinity of an airport will increase the potential for wildlife hazards at the airport.*"<sup>2</sup> The risk assessment functions outlined in both Advisory Circulars are precisely what the Port needs to pursue now to adequately address SDR 20-6's risk to aviation before approving the plan. Actions short of such an assessment would be inadequate and pose an unknown and unnecessary risk to aviation safety.

At the time of this letter, the Port of Astoria's Wildlife Hazard Management Plan does not specifically address SDR 20-6, the Port of Astoria has not requested an FAA wildlife site visit or assessment, nor has the Port communicated any intent to update their Wildlife Hazard Management Plan. While Astoria airport's reported wildlife strike data may appear to be of little significance, any airport operator can attest

<sup>1</sup> [https://www.faa.gov/documentLibrary/media/Advisory\\_Circular/150-5200-33C.pdf](https://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5200-33C.pdf)

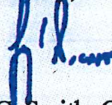
<sup>2</sup> [https://www.faa.gov/documentLibrary/media/Advisory\\_Circular/150-5200-38.pdf](https://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5200-38.pdf)

to almost daily adjusted flight paths in order to avoid striking birds. To alleviate concerns, the Port of Astoria has indicated that the current lease allows for sufficient enforcement of city, state, and federal laws.<sup>3</sup> Such an approach is reactive. Effective aviation safety management programs are proactive and assess changing risk from a known and accurate baseline. Without the results of an FAA wildlife hazard assessment, interested parties have no means to determine the airport's baseline wildlife risk, nor is there an unbiased way to determine the future effectiveness of proposed bird attractant controls.

Additionally, and of further significant concern, is the imminent departure of a full-time Airport Manager from the Astoria airport. My aircrews and facility managers rely heavily on the current Airport Manager's aviation expertise, whose supervision and customer service over the past five years has been invaluable to Coast Guard and general airport operations. The Port of Astoria Airport Manager's recent letter to you (on or about November 4, 2020), however, called my valid concerns regarding SDR 20-6 into question; an act which I believe highlights the Port's departure from the essential aviation safety mindset that is required to manage aviation operations. On January 22, 2020, a Coast Guard HC-27J twin-engine aircraft struck multiple (20-30) Western Sandpiper birds when landing on Runway 08 at Astoria Airport. According to 14 CFR §139.337(b)<sup>4</sup>, the event should have led the Port of Astoria to trigger an FAA Wildlife Hazard Assessment, which the Port failed to do. This event highlights my growing concern, namely, that the Port of Astoria's gradual departure from an aviation mindset to one of economic recovery will erode the current safety posture of the airport, thereby putting its tenants at avoidable risk of incidents and/or accidents.

Thank you for the opportunity to comment on this initiative.

Sincerely,



J. C. Smith, CAPT  
Sector Commander  
U. S. Coast Guard

<sup>3</sup> Letter from Mr. G. Kobes to the City of Warrenton Planning Commission included in Mr. M. Barnes' letter to the City of Warrenton Planning Commission dated November 4, 2020.

<sup>4</sup> [https://www.ecfr.gov/cgi-bin/text-idx?SID=4d140050ee244fc03dfcd99dd9692c8d&mc=true&node=pt14.3.139&rgn=div5#se14.3.139\\_1337](https://www.ecfr.gov/cgi-bin/text-idx?SID=4d140050ee244fc03dfcd99dd9692c8d&mc=true&node=pt14.3.139&rgn=div5#se14.3.139_1337)