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October 8, 2020

Via email to cityplanner@ci.warrenton.or.us
Warrenton Community Development Department
P.O. Box 250
Warrenton, OR 97146-0250

Mark Barnes, Interim City Planner:

I am writing to express a 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. The proposed facility is located less than 1/8 mile from an active general aviation airport that Life Flight Network currently utilizes for one of our rotor-wing air medical bases. The proposed use will generate fish smell and fish residue, which will inevitably attract birds to the area causing a bird strike hazard to the aircraft we operate next door.

Life Flight Network has been based at the Warrenton-Astoria Regional Airport since May 2015. We signed a 20-year long term lease with options for an additional 20 years in September 2018, and recently completed the fabrication of a new rotor-wing hangar facility in April 2020. Our rotor-wing base operates a single pilot instrument rated helicopter with a typical crew of three and often a total of five people when the helicopter departs the airport with a patient and a family member in addition to our Life Flight Network crew. We also regularly fly single pilot instrument rated fixed-wing aircraft into the airport to pick up patients and possibly family members.

There is no back-up in either our rotor-wing or fixed-wing aircraft should a bird crash through the windshield and incapacitate the pilot. The aircraft will crash, resulting in the likely deaths or serious injury of the 3-5 persons on board. Unless the proposed fish meal processing facility can eliminate *any* smell that attracts birds, its operations have the potential to be a serious safety issue for Life Flight Network and other airport users.

We believe the proposed use directly conflicts with Section 16.92.040 of the Warrenton Municipal Code, which allows commercial and industrial uses in the Airport Operations Overlay District, *provided the use does not result in the creation of bird strike hazards*. In addition, Section 16.92.060 of the Code requires a determination from the Federal Aviation Administration and the Oregon Department of Aviation that the proposed use will not pose a hazard to air navigation.

As background for your consideration, please refer to the Federal Aviation Administration's Advisory Circular 150/5200-33B, "Hazardous Wildlife Attractants on or Near Airports." https://www.faa.gov/documentlibrary/media/advisory_circular/150-5200-33b/150_5200_33b.pdf
The Advisory Circular states:

During the past century, wildlife-aircraft strikes have resulted in the loss of hundreds of lives worldwide, as well as billions of dollars in aircraft damage. Hazardous wildlife attractants on and near airports can jeopardize future airport expansion, making proper community land-use planning essential.

Chapter 4 lays out the process and requirements for an airport such as the Warrenton-Astoria Regional Airport that receives federal grants to conduct an assessment of the hazards inside that envelope. Based on the current turbine operations at the airport, we believe the envelope is 10,000 feet or approximately two miles. This would extend even further for circling approaches, which are commonly required.

Our understanding is the FAA is still reviewing the application of the Scoular Company to develop a fishmeal processing facility on airport property. Until that review is complete, Life Flight Network's position is the proposed use will create a significant likelihood of bird strikes and, unless the applicant can show unequivocally it can comply with the Warrenton Municipal Code, the application should be denied.

Life Flight Network fully supports the Warrenton-Astoria Regional Airport and the airport industrial park expansion with new businesses. However, any new businesses must be operated in a manner such they do not attract birds or other hazardous wildlife thereby creating a serious safety issue and placing the lives of airport users at risk. We would appreciate if our concerns were addressed as part of the City of Warrenton's Planning Commission review process.

Please let me know if there is anything else you need from Life Flight Network. Dan Travers is Life Flight Network's point of contact for this matter and can be reached at 503-468-8185.

Thank you,



Ben Clayton
Chief Operating Officer

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Sector Columbia River

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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

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 year¹. Over a 20-year period, 31.5% of all Air Force BASH incidents occurred between the surface and 1000 feet above ground level². 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

¹ https://www.cnicy.navy.mil/regions/cnrse/installations/nas_kingsville/om/air_operations/bash.html

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