

Union County Airport Authority
760 Clymer Road
Marysville, Ohio 43040

March 23, 2022

TO: Mark Reams, President of Council, At Large
Terry Emery, City Manager

CC: Henk Berbee, Vice-President of Council, At Large
J.R. Rausch, At Large
Aaron J. Carpenter, Ward One
Alan Seymour, Ward Two
Deborah Groat, Ward Three
Donald Boerger, Ward Four
Public Safety/Service Committee

SUBJECT: Union County Airport Authority (UCAA) Official Position on Watershed projects within 5000 feet of the Union County Airport property line.

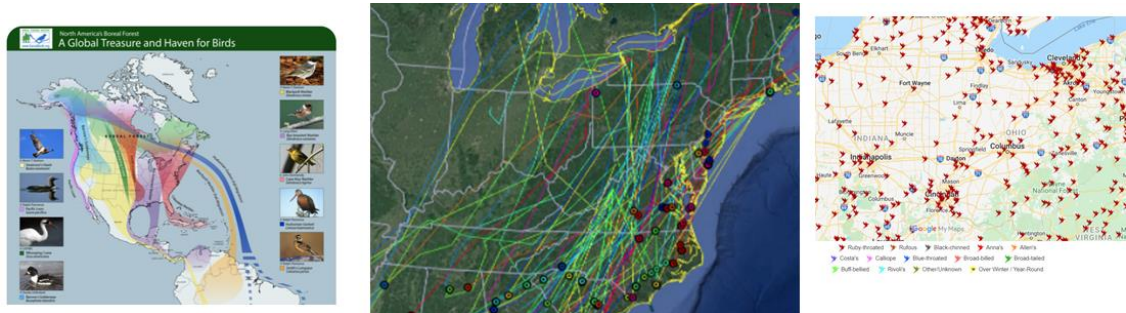
1. The UCAA, supported by the Union County Commissioners, opposes the construction, development or expansion of any hazardous wildlife attractants (Retaining ponds, watersheds and other projects which will attract animals) within 5000 feet of the Union County Airport (KMRT) property line. This opposition includes the Marysville Watershed project vicinity Weaver Rd and adjacent to the departure end of runway 9 and existing storm water basins at Chestnut Crossing and Marysville Flats / The Residences at Woodside Apartment Homes.



2. The facts supporting our position are also the position of multiple federal agencies including: the Federal Aviation Administration, the U.S. Fish & Wildlife Service, the National Academies of Sciences, and the U.S. Department of Agriculture.

- a. These watershed projects wantonly ignore FAA Advisory Circular 150/5200-33B, C 150/5200-33B: *Hazardous Wildlife Attractants on or Near Airports*.
 - These watersheds are all “wet stormwater basins” and are adjacent to the airport property line. Wet stormwater basins fail to follow best safety practices to reduce the risk of wildlife strikes by ignoring FAA recommendations for a separation distance of 10,000 feet at Airports selling Jet-A fuel (turbine-powered aircraft) for any hazardous wildlife attractants.
 - These wet stormwater basins (along with most landscape lakes and ponds) are considered hazardous wildlife attractants. These hazardous wildlife attractants are adjacent to the airport property line and fail to follow best safety practices to reduce the risk of wildlife strikes by ignoring FAA recommendations to protect approach, departure, and circling airspace for a distance of five (5) statute miles between the farthest edge of the Air Operations Area (AOA) and the hazardous wildlife attractant.
- b. These hazardous wildlife attractants are adjacent to the airport property line and fail to follow best safety practices to limit or reduce the risk of bird strikes and animal collisions by ignoring the Federal Aviation Administration, the U.S. Fish & Wildlife Service, the National Academies of Sciences, and the U.S. Department of Agriculture recommendations to limit development of hazardous wildlife attractants (Retaining ponds and other projects which will attract animals) projects which will attract deer, geese, foxes, owls, various waterfowl and coyotes – All increase dangers to aircraft operations.
- c. All federal government agencies and guidance concede that the minimal safe distances may have to be compromised for numerous reasons. But in cases when the hazardous wildlife attractant guidance cannot be met, the recommended solution is “Dry Stormwater Basins” with flow rates that release the water within a maximum of 48 hours of a stormwater event.
- d. There are at least seven (7) hazardous wildlife attractants within 0.5 statute miles of the departure end of runway 9. All hazardous wildlife attractants identified are either wet stormwater basins or landscape ponds.
- e. The inclusion of two additional hazardous wildlife attractants will significantly increase the risk and the potential for off airport accidents which could include loss of life and property damage given the close proximity of single and multiple resident complexes to the airport.

- The airport already has a challenge with migratory birds on and around the airport due to the aforementioned hazardous wildlife attractants.
- Major migration routes over central Ohio include Canadian geese, ducks, black birds, Golden-winged Warbler, Bobolink, Sparrows and Hummingbirds. The Atlantic Flyway is a major north-south flyway for migratory birds in North America and it goes directly over central Ohio.



- March 1st to June 1st and August 1st to November 15th during respective Spring and Fall are the main migration seasons for the lower 48 states of the United States as well as the main flying periods for the airport. With an average weigh of 12 pounds, a collision between airplane and a Canadian Goose is a significant and dangerous accident.



- The number of wildlife strikes reported per year to the FAA has increased steadily from about 1800 in 1990 to over 16,000 in 2018.

- Ohio airports reported 3647 bird strikes from 2012 to 2021 with 444 in 2021 alone. The FAA estimates that the true number of bird strikes is twice the reported number as most private pilots do not report bird strikes to the FAA. The table provides ten-year data for airports in central Ohio reporting bird strikes to the FAA.

Airport	Identifier	Bird Strikes
Bolton	KTZR	10
Butler County	KHAO	5
Delaware	KDLZ	5
Newark	KVTA	4
Ohio State	KOSU	77
John Glenn International	KCMH	946
Mansfield	KMFD	59
Rickenbacker	KLCK	334
Findley	KFDY	13
Carroll County	KTSO	2

- There have been at least three near bird strikes last year at the Union County Airport.
 - Yearly, wildlife strikes result in more than 350 fatalities, cost \$330 million in damages and 500,000 hours of aircraft down time.
- f. The UCAA, with the support of the Union County Commissioners, recommend:
- g. The City of Marysville make the safety of the residential neighborhoods surrounding the Union County Airport and airport operations it's highest priority by incorporating federal agency guidance to require all hazardous wildlife attractants within 5000 feet of the airport property to be "Dry Stormwater Basins" with flow rates that release the water within a maximum of 48 hours of a stormwater event.
- Provide guidance to modify the Marysville Watershed project wet stormwater basins, vicinity Weaver Rd and adjacent to the departure end of runway 9, to a "Dry Stormwater Basin" with flow rates that release the water within a maximum of 48 hours of a stormwater event.
 - Provide guidance to convert existing wet stormwater basins at Chestnut Crossing and Marysville Flats / The Residences at Woodside Apartment Homes to "Dry Stormwater Basins" with flow rates that release the water within a maximum of 48 hours of a stormwater event on or before March 1, 2023.

- Where it may not be feasible to convert wet ponds to dry retention basins, we urge the city to engage in a program of Wildlife Hazard Management aimed at mitigating the risk of wildlife hazards within 5000 feet of the Union County Airport, using techniques such as netting, balls, turf grass management, repellants etc.
- The Public Safety/Service Committee update building codes to require landscape ponds or water features and wildlife attractants of any size within 5000 feet of the Union County airport be required to develop and comply with a wildlife mitigation plan that reduces the risk of bird strikes and wildlife incursions. Where water retention may be necessary, that only “Dry Stormwater Basins” with flow rates that release the water within a maximum of 48 hours of a stormwater event within 5000 feet of the airport property line be permitted.
- The Public Safety/Service Committee coordinate and seek approval of all hazardous wildlife attractant projects within 5000 feet of the airport property with the UCAA.

h. Prepared and approved by the Union County Airport Authority:

John Popio, Chairman
 Bruce Rausch, Member
 Phillip LaPointe, Member
 Shaun Bailey, Member
 Ken Denman, Member
 Bob Chapman, Member
 Steve Koenig. Member

References:

- i. FAA Advisory Circular 150/5200-33B, C 150/5200-33B: *Hazardous Wildlife Attractants On Or Near Airports*
- ii. U.S. Fish & Wildlife Service, *Threats to Birds: Collisions-Aircraft*
- iii. National Academies of Sciences, Engineering, and Medicine, the Transportation Research Board (TRB), *Habitat Management to Deter Wildlife at Airports*
- iv. U.S. Department of Agriculture, *Protecting the Flying Public and Minimizing Economic Losses within the Aviation Industry*
- v. <https://wildlife.faa.gov>
- vi. <https://birdcast.info/migration-tools/local-migration-alerts/>
- vii. <https://www.aopa.org/training-and-safety/active-pilots/safety-and-technique/bird-and-wildlife-strikes#ti>
- viii. <https://www.audubon.org/content/atlantic-flyway>
- ix. https://www.faa.gov/airports/airport_safety/wildlife/resources/media/2005_FAA_Manual_complete.pdf