



ATTACHMENT #2

United States Department of Agriculture

United States
Department of
Agriculture

Marketing and
Regulatory
Programs

9001 E. Frontage Rd
Palmer,
Alaska 99645

September 2, 2021

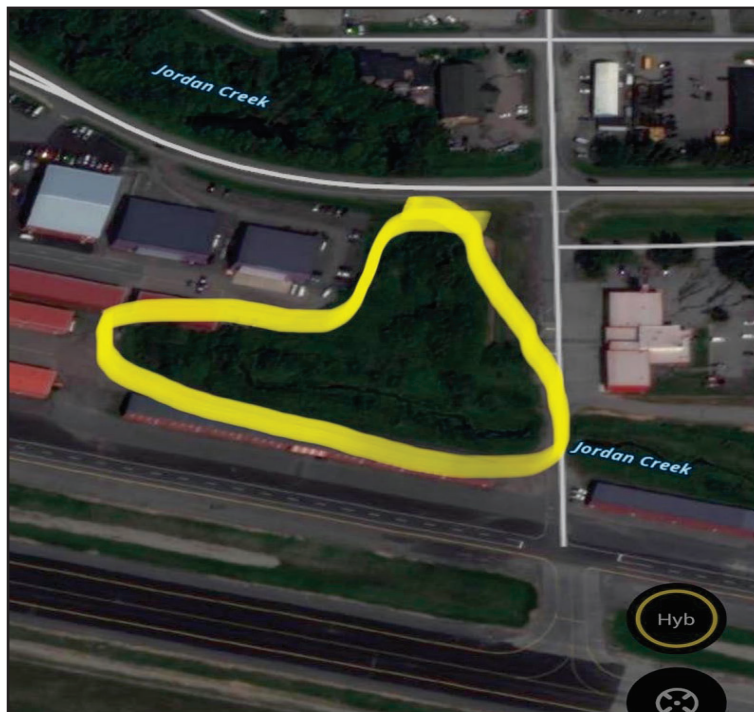
Patty Wahto
Airport Manager
Juneau International Airport
1873 Shell Simmons Drive
Juneau, AK 99801

Dear Patty,

I am writing this letter regarding the proposed vegetation management located along Jordan Creek on the North side of the airport adjacent to the Capitol Fire and Rescue station (Figure 1). The vegetation in this area is a wildlife attractant as it provides refuge and food for wildlife. This area is within 100 meters of the Taxiway and Runway and poses an immediate threat to the safety of aircraft taking off and landing. In accordance with FAA's (Federal Aviation Administration) 14 Part 139.337 (a) Certification for JNU (Juneau International Airport): *each certificate holder must take immediate action to alleviate wildlife hazards whenever they are detected.*

There are several species of vegetation within the area including: Sitka spruce (*Picea sitchensis*), Cottonwood (*Populus trichocarpa*), and Mountain Ash (*Sorbus americana*). Mountain Ash is a fruit bearing tree which is a known wildlife attractant.

Figure 1.



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JNU is surrounded on three sides by the Mendenhall Wetlands State Game Refuge (MWSGR) which is obviously a natural attractant for wildlife. Due to this proximity it is of the utmost importance that we manage habitat/wildlife attractants within the airport boundaries to reduce the risk of wildlife utilizing the Runway and Taxiway as a travel corridor to reach areas such as the heavily vegetated area of Jordan Creek. In July we observed Sitka black-tailed deer (*Odocoileus hemionus sitkensis*) utilizing this area for cover and browsing. USDA Wildlife Services personnel hazed these deer several times but ultimately, we had to utilize lethal control to take one of the deer after it crossed the Runway, Taxiway, and float pond multiple times posing a major threat to aircraft. Numerous other wildlife has been observed in this area including black bears (*Ursus americana*), Northwestern Crows (*Corvus caurinus*), Common Ravens (*Corvus corax*), Bald Eagle (*Haliaeetus leucocephalus*), and Northern Harriers (*Circus hudsonius*); all of which pose a significant safety threat to aircrafts.

In compliance with the FAA Part 139 Regulations JNU Airport Management and USDA Wildlife Services maintain a Wildlife Habitat Management Plan (WHMP). The WHMP is updated and reviewed every year by JNU, USDA Wildlife Services, and FAA Certificate Inspectors. Section 1.3 Hazardous Wildlife and Associated Attractants of the WHMP states the need to manage hazardous wildlife and the attractants located on and around JNU. Additionally Section 2.0 Authority and Responsibility for Implementation states that: *JNU Airport Manager who bears the responsibility according to 14 CFR Part 139.337. This regulation asserts that the certificate holder is the party responsible for wildlife hazard management at the airport. The City and Borough of Juneau (CBJ) designates the JNU Airport Manager as the person responsible for daily maintenance and safe operating conditions at JNU. Safety is the primary concern driving wildlife hazard management operations. The goal of all authority derived from this WHMP is to enhance the safety of passengers and reduce the damage threat to aircraft operating at JNU.*

The proposal to remove the vegetation in this area while maintaining a buffer immediately around the creek is based in safety and compliance with FAA standards. To allow this area to continue to grow unchecked would be irresponsible and risk the FAA certification that JNU requires to operate.

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