## **ATTACHMENT #6**

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Ms. Jeannie Johnson, Manager Juneau International Airport 1873 Shell Simmons Drive Juneau, Alaska 99801

Dear Ms. Johnson,

This letter responds to William Wilmoth's letter proposing the removal of the airport eagles' nest and the destruction of the tree in which the nest exists. I received a copy of the letter only within the past two days.

I object to this measure as extreme and not a reliable protection for aircraft and passenger safety. This pair of resident eagles provides a beneficial predator role as a deterrent to other eagles and to flocking waterfowl on the wetlands. Flocks of ducks and geese usually fly around the densely forested woodland rather than above or through it because the forest provides a natural barrier. The eagles' territorial defense provides the predator deterrent within the forest. I will address specific answers to Mr. Wilmoth's statements later in this letter.

It is important to find solutions that actually provide airport safety not merely actions that seem simple and obvious. The proposal fails to understand the real issues of airport safety beyond the airport: the thousands of ducks and geese that feed and rest adjacent to the airport and the attractant of Mendenhall River and its population of various species of migrating fish. Harassing the resident eagles away from the forest increases the likelihood that additional prey species will move in and that they will flock in larger numbers.

A pair of eagles has nested in the woodland for more than twenty years. I have personally observed them in this territory since prior to 1989. During that time the eagles have used other nests in the woodland. One well-established nest was used until 2001 when it was destroyed by a severe windstorm in November of that year. Since about 1997, they have successfully raised only three eaglets to fledging.

Some background information is valuable for those making decisions who have not been fully involved in alroot issues in the past dozen years. Both the eagles and the forest were major topics of scoping and environmental impact statement (EIS) comments. Repeatedly, numerous observers supported the view that the dense spruce trees provided a barrier to passage for low flying waterfowl that rest and feed by the thousands on the Mendenhall Wetlands State Game Refuge and that the resident eagles' presence in the woodland reinforce the barrier effect and serves as a deterrent to other large birds. Because of the public comments, the US Fish and Wildlife Service was instructed to prepare a study of the barrier effect. Despite the importance of the Issue and the close proximity to a USFWS field office, no site analysis or study was performed; only a literature search was done.

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As a result of the concern over the woodland and bird strike potential, the EIS recommended the formation of a Wildlife Hazards Working Group. I am a member of that group. We have not been consulted on this topic. It is appropriate to seek answers from the group prior to approving Mr. Wilmoth's plan.

In recent years, attitudes toward the removal of predators and their habitat have changed. Evidence has shown that prey populations that are not kept in balance with predators result in severe damages to people and property. The best example is the increased populations of deer in other parts of the United States. Without predators, numbers of deer soared causing more vehicle accidents and human injury as well as property and habitat damage.

As wildlife managers' understanding has grown, more innovative solutions to controlling wildlife problems have been developed. Knowledgeable solutions should be explored for the woodland eagles that are based upon a comprehensive understanding of the local situation. The nest need not be removed nor the eagles chased away from the territory. Their beneficial role would remain an advantage.

Below are comments reluting some of Mr. Wilmoth's points:

"Won't this or another pair attempt to build another nest anyway?" Under normal circumstances the resident eagles defend the nest area from other eagles, ospreys and owls. This is ideal eagle habitat. They do not migrate from this area. During summer they feed on fish in the river, channel and other sites, such as the floatpond. In winter the eagles feed on ducks, guils, and Canada geese as well as fish remnants left by river otters on the floatpond ice. Year-round eagles feed on voles on the wetlands. Other eagles would use the woodland for perches if it is not occupied by the defensive resident pair. The proximity to waterbodies is the biggest draw for birds. As long as the river flows at the airport's perimeter, eagles and other predators will find food there.

"Will the removal of the nest tree eliminate the threat of bald eagle strikes at Juneau?" Wilmoth answers no. I agree. However, I believe nest tree removal may increase threats by other birds who are not deterred by the resident pair.

"Doesn't a nesting pair help keep other eagles off the airport?" I disagree with Mr. Wilmoth's conclusion. He bases it on an extreme example of a dense concentration of eagles feeding on capelin in May. In springtime after a long period without readily available rich fatty food like fish, eagles will always gather in large congregations. As is well known by evidence of other species, such rich food attractants draw wildlife that would normally not tolerate close associations. The best examples are polar bears feeding at whale carcasses and brown bears feeding at salmon spawning sites. Eagle concentrations on spring capelin have occurred in the past on the Mendenhall Wetlands when hundreds of fish were trapped on the grasses by the receding tide. Such special events will always need the attention of airport wildlife managers.

Using one example of the resident pair's inability to control many of its cohorts at a major food attractant falls to recognize the day-to-day role the eagles play in preventing waterfowl and other flocking birds from using the woodland and airport.

"How many strikes have been documented with eagles at the airport?" Neither of the resident pair have been involved in strikes. It is also important to note that this pair have used manmade perches only after the airport removed a favored cottonwood perch tree from the western perimeter of the forest that provided an elevated view of the river. Creating a diversionary perch—from a driftwood log—downstream from the dike trail might draw the eagles away from the flight path. Better bird deterrent wires on airport equipment would aid in this effort for other birds also.

Wilmoth recommends removal of the nest tree and any subsequent trees where the eagles may attempt to build a nest. Such serial removal of trees fails to recognize the value of a natural spruce forest barrier that would be nearly impossible to re-create effectively by humans. The recent destruction of the woodland for airport expansion is an example of creating hazardous conditions by expanding flyways for waterfowl to traverse from the wetlands to the airport. Once construction activity ceases, these openings will be invitations for geese and ducks to enter airspace and potentially cause bird strikes.

The eagles and the trees offer protection to the airport. They should be preserved. Innovative wildlife management techniques should be used to provide directed movement for the eagles versus nest and territory elimination. Targeted hazing can establish "no-go zones" for the resident eagles that allow them to occupy the woodland and avoid aircraft flight paths.

I urge you to consult the Wildlife Hazards Working Group and to explore skilled management practices instead of accepting Mr. Wilmoth's Armageddon approach of complete removal.

Best regards,

Laurie Ferguson Craig