

The Road Taken

By John Ostrom, C.M.

he legendary baseball player and manager Yogi Berra once said, "You got to be careful if you don't know where you're going, because you might not get there."

Thinking about that Yogi-ism, I thought it would be more applicable to the challenges surrounding airport wildlife management if I deleted the word "not," thus creating a new quote, "You got to be careful if you don't know where you're going, because you might get there."

Ever since that fateful Jan. 15, 2009, when US Airways Flight 1549 struck a flock of Canadian geese and went into New York's Hudson River, there has been a flurry of commotion and activity concerning airports, wildlife, and what is being done, and in some cases not being done, to mitigate the hazards.

In one way or another, we all have been affected by this event. For those of us in the airport operations business, we've struggled with the overwhelming flood of government guidance, policy changes, federal reviews and the microscopic scrutiny placed upon us by the public and media. Even though this accident was not a "tombstone" event, we've felt the considerable effects of actions taken and directives placed on us.

With the splash heard around the world, airport wildlife hazard management was no longer the younger, and often ignored, sibling of winter operations, emergency management and runway safety in the Part 139 family. Wildlife, and the hazards and risks it poses to aviation, has been brought to the forefront and needs to be addressed by every airport operator in the country, if not the world. The questions before us are: where are we going, and how do we get there?

But to map where we are going, we need to understand where we have been. It was George Santayanna, an early 20th century poet and philosopher, who wrote, "Those who cannot remember the past are condemned to repeat it."

Ever since the dawn of flight, wildlife has been a threat to the safety and well-being of those who fly. Over the years, wildlife has taken hundreds of lives and caused billions of dollars worth of damage to the aviation industry. US Airways Flight 1549 wasn't the first significant bird strike that resulted in double engine ingestion, and it won't be the last. Two other examples of significant strikes that ended up

leading to regulatory changes in our industry are:

- On Feb. 22, 1999, a Delta 757 during takeoff from Cincinnati/Northern Kentucky International struck a flock of European starlings. Both engines sustained substantial damage from ingesting the birds.
- On March 4, 1999, a USA Jet Airlines DC-9 on final approach to Kansas City International struck a flock of snow geese. Both engines were severely damaged, resulting in one shutting down and the second retaining enough power for the crew to safely land the aircraft.

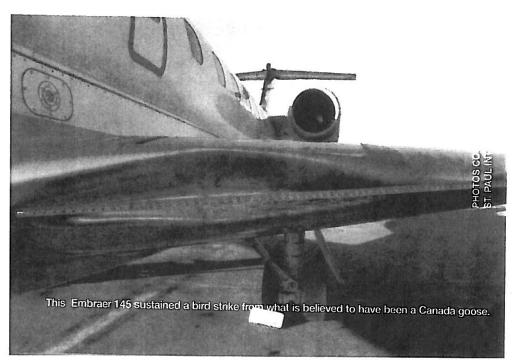
Later that year, the National Transportation Safety Board (NTSB) issued nine safety recommendations (A-99-86 through -94) to FAA as a result of these two separate bird strike incidents. Upon receiving FAA's responses to the safety recommendations, NTSB closed out all nine recommendations with six acceptable and three unacceptable responses. The three recommendations that were deemed to have unacceptable responses from FAA were:

- A-99-088 Require that wildlife hazard assessments be conducted at all Part 139 airports.
- A-99-089 Require the development of a wildlife hazard management program for all airports determined to need one as a result of a wildlife hazard assessment.
- A-99-091 Require all airport operators to report bird strikes to FAA.

Ten years later, history repeated itself as US Airways Flight 1549 hit the flock of Canadian geese and significantly damaged both engines.

On Jan. 14, 2010, FAA released the fact sheet titled Wildlife Hazard Mitigation Program, which listed the following initiatives the agency has undertaken to moderate the wildlife hazard problem:

- Opened the National Wildlife Strike Database to the public.
- Issued a certification alert to airport operators on June 11, 2009, reminding them of their obligation under Part 139 to conduct a wildlife hazard assessment if they experience a "triggering event" described in 139.337 (b).
- Conducted a review of the National Wildlife Strike Database that found almost 40 percent of strikes that occur are being reported, and that mandatory strike reporting is not required.
- Redesigned the Wildlife Hazard Mitigation Web site.
- Expanded the current research related to bird radar technology.
   The fact sheet also identified



some of FAA's future initiatives, which include:

- Plans to issue a Notice of Proposed Rulemaking in 2010 to make wildlife hazard assessments mandatory at all Part 139 airports, regardless of whether a "triggering event" has occurred.
- Plans to develop a program to conduct wildlife hazard assessments at approximately 2,000 general aviation airports.
- Development of software that would allow anyone to file a strike report using handheld mobile devices.

So, where do we go from here? As airport operators, our direction is simple because our destination is dictated by regulation and policy guidance. Part 139.337 clearly states, "The certificate holder must take immediate action to alleviate wildlife hazards when they are detected." It goes on to describe the requirements for conducting a wildlife hazard assessment and the subsequent development and implementation of a wildlife hazard management plan, which is our destination. Although not simple, these two documents are not complicated either, but they are complex and require thought and work when creating them.

With the adoption of the revised Part 139 in 2004, FAA required that a wildlife hazard assessment be conducted by a "qualified wildlife damage management biologist." The issuance of Advisory Circular 150/5200-36 in 2006 defined the education, experience and training requirements for those "qualified" biologists.

In 2009, FAA pushed harder for airports to conduct wildlife hazard assessments. This push was coupled with a more liberal approach toward using AIP money to conduct the assessments and further restrictions on using USDA Wildlife Services (WS) to conduct those assessments. It led to a flood of private biologists and contractors scrambling to meet FAA's requirements and secure a lucrative airport contract.

In the past, airports were allowed and encouraged to contract directly with WS to conduct an assessment, thus guaranteeing them the services of a "qualified" biologist. As a result of the 2009 changes, airports now were faced with the almost impossible task of trying to vet the qualifications of every private biologist who responded to a request for proposal.

In the summer of 2009, FAA issued guidance for using AIP dollars in the form of Program Guidance Letter 09-01 – Eligibility of Wildlife Hazard Assessments and Program Information Memorandums, PIM2 – Stand-Alone grants for Wildlife Hazard Studies at Part 139 Certificated Airports, and PIM 3 – Use of USDA for Wildlife Hazard Assessment Studies. This guidance did clear up some of the confusion experienced by airports, but did nothing to alleviate the daunting task of vetting potential "qualified" biologists.

While there has been considerable confusion surround-



ing wildlife hazard assessments, nothing has changed with Part 139's requirements for wildlife hazard management plans. FAA still holds that it is the airport operator's responsibility to create and implement a plan using the wildlife hazard assessment as a foundation.

As you can see, our destination is fairly clear. As airport operators, we are required to mitigate wildlife hazards whenever they are found through the development and use of a wildlife hazard assessment and wildlife hazard management plan. So how do we get there, you ask. I would recommend that you consider the following roadmap as you move forward with your wildlife hazard management program:

Realize that you're not in this alone. This is a problem that you as an airport cannot solve by yourself. You will need to include your tenants, users and local experts to help develop solutions and practices that work best to mitigate the wildlife problems at your airport. It's all about expectations. Make sure that you know what they expect, and make sure that they know what you expect. From this foundation, you can start to develop a mutually acceptable program with clear, well-defined objectives and metrics.

Talk with your certification inspector. Ask him/ her what other airports are doing and obtain copies of their wildlife hazard assessments and management plans. Remember, on the operations side, plagiarism is the highest form of flattery.

Establish contact with your state WS office.

These people are the experts in wildlife damage management, so take advantage of their expertise and ask them to come to your airport for a site visit. This is usually a free, one-day visit during which a qualified wildlife biologist will look at your airport and, talk with you about wildlife attractants on and off your airport, and wildlife species and hazards seen during the visit. Further, the biologist will perform an analysis of wildlife strike data for your airport. The biologist will follow up the visit with specific recommendations on how to start mitigating your wildlife problems immediately.

## WILDLIFE MANAGEMENT

Attend one of AAAE's three-day wildlife courses.

Experts in airport operations and wildlife

I management have developed three comprehensive courses for AAAE for anyone interested or actively involved in an airport's wildlife management program. The Airport Wildlife Techniques Course is hands-on training that introduces participants to the tools and terminology used in an airport wildlife management program. The Airport Wildlife Manager's Course is designed for individuals who are responsible for the oversight of an airport's wildlife management program and focuses on the development of an airport wildlife hazard assessment and management plan. The Airport Wildlife Trainer's Course builds on the foundation of the techniques course and is designed for those responsible for implementing the airport wildlife management program and training others.

Attend a Bird Strike Conference. AAAE, Salt Lake City International and Bird Strike Committees USA and Canada are hosting the 2010 Bird Strike Conference on June 21-24, 2010, in Salt Lake City. This three-day conference is an excellent opportunity to meet with and hear from airport wildlife management experts around the world.

There are a lot of online resources, but if you start with these two, they'll link you to many others:
Bird Strike Committee USA, www.Birdstrike.
org; and FAA Wildlife Strike Database, http://wildlifemitigation.tc.faa.gov/wildlife.

Give me a call, or send me an e-mail. If you find yourself stumped and don't know where to look or who to ask, let me know, and I'll do my best to get you started in the right direction.

Christopher Columbus once said, "By prevailing over all obstacles and distractions, one may unfailingly arrive at his chosen goal or destination." The key to any successful journey or program is to know where you're going and how you want to get there. If you use the road map I've provided, you'll soon be on your way to developing a successful airport wildlife management program.

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