

## The Umstead Coalition

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*B.W. Wells Association  
Capital Group Sierra Club  
Eno River Association  
Friends of Jockey's Ridge  
Friends of State Parks*

*Headwaters Group Sierra Club  
New Hope Audubon Society  
Neuse Riverkeeper Foundation  
NC Herpetological Society  
NC League Conservation Voters Foundation*

*NC Native Plant Society  
NC Wildlife Federation  
Orange-Chatham Group Sierra Club  
Raleigh Ski and Outing Club, Inc.  
Rockingham County Naturalist's Club  
Wake Audubon Society*

### MEMORANDUM

May 26, 2021

To: Patrick Hannah, Chair, Raleigh-Durham Airport Authority (RDUAA)  
David Morgan, David Kushner, Ellis Hankins, Dickie Thompson, Sepi Saidi, Tammie E. Hall,  
and Yesenia Palanco-Galdamez, RDUAA Board members

From: Jean Spooner, Chair  
The Umstead Coalition  
Cell 919-602-0049  
umsteadcoalition@gmail.com

Subject: RDU Fence, Request to follow good-governance and pursue alternatives solutions

RDUAA Staff re-submitted an Application to NC Department of Environmental Quality- Division of Water Resources (DEQ-DWR) for a **Neuse Buffer Authorization** for Raleigh-Durham Airport Authority-Enhanced Security Perimeter Fencing. The submitted description:

*"4. Proposed Activity. This project proposes to install approximately 6 miles of security fencing along the southeastern portion of airport property, west of Old Reedy Creek Road. This includes clearing a 30- foot wide permanent maintenance corridor (reduced to 10-ft wide within Neuse River Buffer areas) and the installation of an 8- ft. high chain link fence topped with 3 strands of barbed wire. Anticipated construction equipment includes forestry mulchers, and construction vehicles for delivery and installation of fencing. See attached permit drawings, details and Section D.1. below."*

(Note: the submitted designs still show 30-ft wide deforestation through the wetland areas).

The 8-foot high, chain-linked fence topped with 3 rows of barbed wire as well as the wide deforested swath along the fence is in direct defiance of the listing of William B. Umstead State Park, including its forests, in the National Register of Historic Places. The proposed fence specifications are similar to security fencing used at high voltage power sub-stations and correctional facilities. The majority of the fence is proposed to run along the border of William B. Umstead State Park and the Old Reedy Creek Road Recreational corridor. The submitted proposal severs one of the most popular trails in the Triangle Region, "isolates" the "286" track from opportunities of joint trails managed by Wake County and Umstead State Park, harms the Park and public users.

Valid reasons against the fence are listed below, and detailed in the following pages:

- I. DEQ's Neuse Buffer Authorization Acknowledges Environmental Damage Will Occur
- II. Severe negative impacts to William B. Umstead State Park
  - II.A Deforestation Impacts and Harming of Park Trees
  - II.B Detrimental Impacts to Water Quality
  - II.C Impacts to Wildlife Habitat
  - II.D Historic Park Experience
  - II.E Historic State Park Trail Severed
  - II.F Local, Regional, and National Greenways Connected to and Through William B. Umstead State Park Negatively Impacted
- III. Public Safety Concerns
- IV. Good Governance Process Should be Followed Employing Alternative Solutions

There are better approaches that achieve the airport's goals without environmental damage, an expenditure of millions of dollars, diminished public safety, and severe impacts to William B. Umstead State Park. We are available to partner with the airport toward improved solutions, benefiting all parties including the public we both serve.

## **I. DEQ's Neuse Buffer Authorization Acknowledges Environmental Damage WILL Occur**

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The Neuse Buffer Authorization (aka "permit") confirms environmental damages WILL occur. This "Authorization":

- Acknowledges and "Authorizes" the environmental damage to the 50-foot Neuse Riparian Buffers
- Does not address the total environmental and other damages (because those are outside the scope of the Neuse Buffer Authorization)
- Does not address environmental damage from lack of protections of the stream from crossing the streams and wetlands by the "patrols;" no bridges or culverts or stream protections
- Does not address the environmental damages (water quality, stormwater quantity, sound dampening of I-40 and airport noise) that will result from the proposed **deforestation** and fencing in the watershed areas outside the Neuse Buffers.
- Does not address the severing of one of the most popular trails in the region (William B. Umstead State Park's Reedy Creek Multi-use Trail - RCMUT)
- Does not address the severing the East Coast Greenway and US 1 Bike route
- Does not address the visual assault to the users of William B. Umstead State Park and its connected greenway corridor along Old Reedy Creek Road Recreational Corridor
- Does not address the wildlife corridor disruption
- Does not address the severe objection by the NC Division of Parks and Recreation and damages to William B. Umstead State Park

- Does not address the violation of the listing of William B. Umstead State Park (including its forest) in the National Register of Historic Places
- Does not address the likely damage and killing of trees WITHIN William B. Umstead State Park
- Does not address safety concerns of access to William B. Umstead State Park for fire and rescue
- Does not address the severing “286” from opportunities to have forested bike/ped trails on both “286” and within William B. Umstead State Park
- Does not address the fact that a Security Fence already exists to protect the RDU runways, terminals, parking areas, etc.
- Does not evaluate alternatives, including the “no-build” alternative and Wake County’s lease

## II. Severe Negative Impacts to William B. Umstead State Park

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### II.A. Deforestation Impacts and Harming Park trees

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The forest adjacent and within William B. Umstead State Park and its connected greenways serve multiple environmental purposes including:

- Provides pervious areas for infiltration of rainwater and stormwater runoff to enable treatment of pollutants
- Provides pervious areas for infiltration of rainwater and stormwater runoff to decrease downstream flooding in Crabtree Creek
- Provides pervious areas for infiltration of rainwater and stormwater runoff to maintain a healthy baseflow in the streams such as Crabtree Creek
- Provides stream bank stability to minimize sediment and nutrient loadings to streams and wetlands
- Provides diverse wildlife habitat
- Dramatically reduce the **noise** penetration into William B. Umstead State Park that is generated by I-40 and the RDU Airport

The proposed fence and deforestation is too close to the Park trees. The proposed project will **harm and likely KILL trees WITHIN William B. Umstead State Park** – a “taking” of Park resources in violation of 4(f). It is well-established fact that stress on existing trees by cutting roots and/or compacting the soil with equipment (e.g., logging trucks and fence construction equipment) will kill large trees. Trees require preservation and prevention of such disturbance to be OUTSIDE their “root zone” which can be 60 feet radius for mature oak trees. The proposed fence/clearing routing, as submitted in the Application by RDUA staff, comes within 10 feet of the Park boundary. A mature tree root zone can be 5 times the width of their leaf canopy (<https://content.ces.ncsu.edu/construction-and-tree-protection>).

## II.B. Detrimental Impacts to Water Quality

**Airport Lands Drain to William B. Umstead State Park.** The proposed fence has a direct and detrimental impact on the water quality in the streams, lakes and wetlands within William B. Umstead State Park. All the airport lands managed by the RDUAA drain into William B. Umstead State Park. The drainage from the airport either flows to Brier Creek and then to Crabtree Creek, to Haley's Branch to Crabtree Creek, to Crabtree Creek or drains directly into the Park. Crabtree Creek flows through the heart of our State Park. The proposed 6 miles of 30 feet-wide deforested clearing (only narrower within the 50 feet Neuse stream buffers, but still 30' wide through wetlands) crosses numerous streams and wetlands. Deforestation of our streams and wetlands should be avoided.

**Dramatic Lack of Stream and Wetland Crossing Protections.** RDUAA staff-proposed design has NO stream and wetland crossing protections. Ironic given RDUAA staff is claiming they want the fence to protect the streams and wetlands, yet propose 6 miles of deforestation and fencing, with absolutely NO protections at the stream crossings - no culverts, no bridges, Na da. The stated "plan" is to **maintain** and patrol the stream crossings on foot. Even footpaths can create damage to stream and wetlands without proper stream/wetland crossings. Given the steep and WET nature of the proposed stream and wetlands crossings, this seems impractical without proper bridge/culvert stream/wetland crossings.

In RDUAA's response letter to DEQ-DWR on December 18, 2020, RDUAA states the steep conditions on steam crossing at "Feature 28" is the reason they decided not to fence across this stream. The figure below is from page 16 of RDUAA's response letter:



However, RDUAA failed to address how the foot patrols will cross or how the deforestation will be maintained. Interestingly and ironically, this proposed break in the fence is also in the location where the National Guard troops have created a trail that the National Guard routinely and frequently use for running across RDUAA's property to access the trails in William B. Umstead State Park.

Furthermore, the draft Standard Operating Procedure (SOP) includes removal of any new vegetation on either side of the proposed fence. However, they do not specify the method(s) in which the new vegetation will be removed. What equipment is planned to be used? Will bush hogs

be used? Again – what are the protections for the stream and wetland crossings? Where are the bridges and culverts? This smacks in direct conflict with the stated intent “to protect the streams (and wetlands).”

**Manual Fence Gates are Impractical.** Manual slide gates are proposed. These are almost impossible to manage. Woody debris backs up behind closed fences during storms. Manual opening and closing based upon weather forecast is unpredictable and a drain of limited RDUAA staff resources.

## II.C. Impacts to Wildlife Habitat

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The proposed fence would sever one of the last remaining connected wildlife corridors connecting Jordan Lake to Crabtree Creek and Umstead State Park and to the east. This corridor is home to bald eagles, a protected Great Blue Heron nesting site near Haley’s Branch fence, bobcat, and more.

The Migratory Bird Treaty Act protects the Great Blue Heron nesting site by Haley’s Branch in the vicinity of the proposed fence. Before any management of great blue herons is implemented, the NC Wildlife Resource Commission or the U.S. Fish and Wildlife Service must be consulted due to the protected status of the species. (<https://www.ncwildlife.org/Learning/Species/Birds/Great-Blue-Heron#90911040-management>)

## II.D. Historic Park Experience

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William B. Umstead State Park, including its forests, is listed under the **National Register of Historic Places**. The Site ID is: WA0721. Year of Registration: 1995. Listed under: ‘Crabtree Creek Recreational Demonstration Area’ and “Umstead State Park, Raleigh, NC.” William B. Umstead State Park was established in 1934, well before the current RDU Airport.

Yes, it is unusual, if not unique, that the **Federal Register listing includes the forest landscape** (trees and shrubs). Nevertheless, that is a fact. To emphasize this point, the forest landscape is one of the KEY features including in the National Register of Historic Place Application.

Per the Neuse Buffer Authorization Application, visitors to the park will be greeted with 8' tall chain link fence topped by 3-rows of barbed wire (with 30 feet-width of deforestation) along the East Coast Greenway as they approach William B. Umstead State Park from Lake Crabtree County Park. To border our NC State Park with a security fence spec'd for power stations or prisons is an insult to our Park visitors.

The NC Department of Natural and Cultural Resources (DNCR) strongly opposes the fence. Please see attached their January 25, 2021 letter from DNCR to DWR-DWR that highlights their objections to the proposed fence due to severe negative impacts to William B. Umstead State Park.

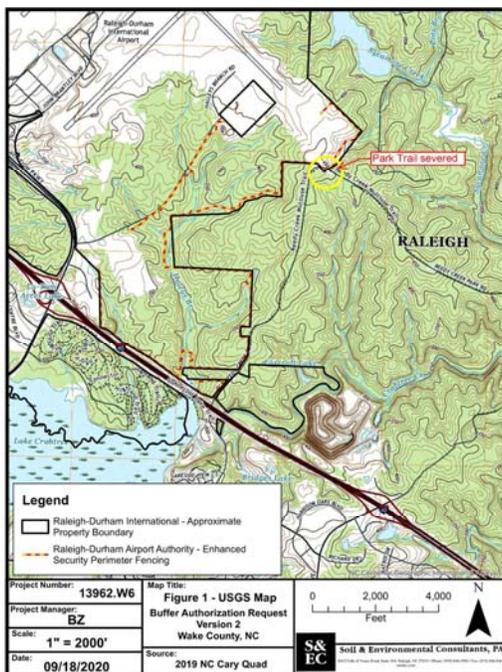
## II.E. Historic State Park Trail Severed

### Proposed Fence Cuts Across and Blocks the Reedy Creek Multi-Use Trail in William B. Umstead State Park's - Historic Use Violated – Popular Trail Severed

YES, the fence and deforestation, as submitted to DEQ by RDUAA staff, blocks (twice) the passage along one of the most popular trails in the Triangle, which is also part of the East Coast Greenway and US1 Bikeway.

There is a clear discrepancy between what RDUAA staff said on this point and the submitted plans. All the submitted (and resubmission plans) continue to show the SAME fence blockage of the William B. Umstead's Reedy Creek Multi-Use Trail.

Please see Figure below and the attachments that show the routing of the fence with Umstead State Park Reedy Creek Multi-use trail severed.



This is a key reason why the RDUAA staff should FIRST vet the fence's purpose and goals, location, alternatives, coordination with William B. Umstead State Park with the RDUAA Board BEFORE submitting the environmental permit applications.

FACT: The Umstead State Park Reedy Creek Multi-use Trail has been in the same location since the Park's establishment in 1934. The trail is located on the historic roadbed that existed since 1800, or earlier.

The Park trail location was established in 1934 and has been used and maintained "ditch to ditch" (by NCDOT and Umstead State Park staff) in the SAME location as a State Park multi-use trail continuously for the last 87 years. All the multi-use trails in the Park were built upon the historic roadbeds. Before it was our Reedy Creek Multi-use Park Trail, it was the Old Middle Hillsboro and Reedy Creek Road in the SAME location for approximately 150 years prior. The Old Middle Hillsboro Road was the road to Durham and Hillsborough. See below the 1914 Soil Survey below (with today's land use faded underneath) to document the historic roads.

North Carolina Maps: Historic O... x +

web.lib.unc.edu/nc-maps/interactive/MC\_099\_1914b.php

# North Carolina MAPS

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NC Maps > Historic Overlay Maps > Wake County Soil Survey, 1914

## Wake County Soil Survey, 1914

Using the interface below, users can compare a historic map from the North Carolina Maps project with a current map or satellite image.

MAP CONTROLS

- Turn Historic Map On/Off
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Original map: "Soil map, North Carolina, Wake County sheet ." Washington, D.C.: U.S. Bureau of Soils and North Carolina Department of Agriculture, 1914. North Carolina State Archives call number MC.099.1914b.

The Old Middle Hillsboro Road was called “the highway” by the families that lived on and traveled on the historic road. William “Pink” Pinckney Warren (1822-1908), Alfred Warren (1967-1927), Robert Warren (1896-1988), Charlie King, McGhee-Zimmerman, Adonijah Baker (1850-1831), Ernest “Press” King (1886-1973) were among the families that lived on Old Middle Hillsboro Road. A.H. Tyner, James Medlin, A.E. Warren, Geo C. Dickinson, Tilton Dampier (1876-1946), Henrietta Warren (1982-1939), Wile Haley (1858-1934), Lewis Page (1959-1815) are among the families that lived along the Old Middle-Hillsboro Road. The Page Family cemetery is located on Old Middle-Hillsboro Road (now the Park Reedy Creek Trail) near the Park trail proposed to be severed.

From the National Register of Historic Places Application for William B. Umstead State Park (Section 7, Page I-18):

**Listing: NC strc XIII, 19<sup>th</sup> c** *“Old Middle Hillsboro Road; intact. This is one of a few old roads that traverse the park. Still passable, although limited to park vehicles, the Old Middle Hillsboro Road was known in the 1870s as Mill Road. (Fendol Bevers Map of 1871). It was the most direct east-west route between Adam’s Crossroads (now RDU Airport) and Method. In the late nineteenth century, after the slow creation of Graylyn Road, vehicular passage moved in a more direct fashion, northward to Hillsboro Road (today US 70). Thus, the name change. Currently, the eastern section is Reedy Creek Road; it originates at Blue Ridge Road, opposite the Polk Youth Detention Center. Before the CCC demolished them in the mid-1930s, as many as thirteen houses were located along Old Middle Hillsboro Road. An easily visible clue to previous human occupation is the neatly manicured Warren Cemetery.”*

FACT: the “corner” of the Reedy Creek Multi-use Trail was within the Park boundary from 1934 to 1958. The Park has never moved this trail. The location of the Park trail has NOT changed. In fact, it would be very expensive to do such. However, the Park boundary was changed in 1958 by a land exchange requested by the FAA, as a result of the WWII runway.

What did change was a forced exchange of land in 1958 to allow for a safety zone for a runway built too close to the Park by the US Government for WWII. A small portion of our Parkland was forced to be traded with the airport in 1958 to provide for a safety zone for the WWII runway (see Wake County Commissioners minutes, Deeds Book/Page 1357/548 and 1358/590). The WWII runway is the General Aviation runway today. When that forced land exchange occurred, the surveyors used the existing survey pin on the **inside bend of the trail/road** as the corner.

After 1958, the Park continued to use this major multi-use trail with collaboration from RDUAA. All of the Park maps clearly show the 1958 revised Park boundary with the historic trail “corner” on airport managed property - there has been nothing hidden, or changed on the part of NC State Parks. The Park maps reflect the fact of the 1958 land swap. They do not hide the fact that the historic Park trail’s historic roadbed bend is now just inside the RDUAA Managed property.

The Reedy Creek Multi-use Trail has been maintained as a public road (now trail since 1934) from at least 1800, if not earlier. The maintenance has been continuous by NCDOT and NC State Parks (ditch to ditch). In addition, it has undergone two recent major renovations/investments. In 1989, the Reedy Creek Multi-use Trail received a major trail renovation project with the assistance of NCDOT, primarily due to the need for access to tornado-damaged areas. The improvements included grading, ditching, crowning, and graveling the trail to its former width (when it was a public road). Then, in the mid-1990’s a major trail renovation project was undertaken by NC State Parks to improve the base and top screenings for horses and bike users. All keeping the SAME location and using the road base and location of the historic public roads. All these major trail renovations were coordinated with the RDUAA.

## **II.F. Local, Regional, and National Greenways Connected to and Through William B. Umstead State Park Negatively Impacted**

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The Old Reedy Creek Recreational Area is a vital greenway, vital greenway connector, and one of the most heavily used recreational corridors in the region. The “road” is THE official greenway. The attached “Regional Trails” graphic from the Town of Cary (<https://www.townofcary.org/home/showpublisheddocument?id=17899>) highlights the vital importance of the Old Reedy Creek Road greenway connecting William B. Umstead State Park to Cary, Morrisville, Apex, Raleigh, and Durham’s greenways

Old Reedy Creek Road is extremely popular. At any time, the “road” (greenway) is used by runners, nature lovers, walkers, bikers, baby strollers, school tract clubs, running and biking groups, community events hosted by local outdoor/running/biking retailers, and families. Furthermore, it is also a key transportation/commuting corridor.

It is reasonable to estimate that the Old Reedy Creek Road Recreational Area is utilized by well over 1,000,000 million users per year. Given the fact that Wake County’s Lake Crabtree County Park and William B. Umstead State Park visitation is well over this number, it is likely the visitation rate is much higher.

The Old Reedy Creek Road is not only heavily used by hikers, runners, and bikers as the connecting hub for the Triangle Regional Greenways, it is also has official designation as being part of the route for the:

- US1 Carolina Connection (<https://www.ncdot.gov/bikeped/ncbikeways/routes/us1-carolina-connection/>)
- WalkBikeNC, North Carolina's Bicycle and Pedestrian Plan which was adopted by the NCDOT Board of Transportation in December 2013 (<https://www.ncdot.gov/bikeped/walkbikenc/>)
- East Coast Greenway (<https://map.greenway.org/>)

The Public investment in greenways in Wake and Durham Counties is extensive (millions of dollars). These public investments are extremely popular and part of the economic engine of this community. The Old Reedy Creek Road Recreational Corridor is a key connector and integral part of these huge public investments, which include:

- Town of Cary's Old Reedy Creek Road Trailhead at 2139 Reedy Creek Road (<https://www.townofcary.org/recreation-enjoyment/parks-greenways-environment/parks/old-reedy-creek-road-trailhead>)
- Wake County's Lake Crabtree County Park (<https://www.wakegov.com/departments-government/parks-recreation-and-open-space/all-parks-trails/lake-crabtree-county-park>)
- The Town of Morrisville's Crabtree Creek Greenway and Hatcher Creek Greenway which were built to connect the Town of Morrisville to Lake Crabtree County Park and to the Old Reedy Creek Road entrance to William B. Umstead State Park
- (in planning by CAMPO) Triangle Bikeway will follow I-40 and link Raleigh, Research Triangle Park (RTP), Durham and Chapel Hill along I-40 and NC 54. (<https://trianglebikeway.com/>)

Other connecting greenways to the Old Reedy Creek Road Recreational Area include:

- Town of Cary's Black Creek Greenway and Bond Park
- Town of Cary's White Oak Creek Greenway
- Town of Apex's Beaver Creek Greenway and Bicycle and Pedestrian System Plan
- Wake and Durham's American Tobacco Trail
- Raleigh's Crabtree Creek Greenway and Neuse River Trail
- Raleigh's House Creek Greenway and the NC Art Museum
- Raleigh's Reedy Creek Greenway and the NC Art Museum
- Raleigh's Rocky Branch Trail
- Raleigh's Walnut Creek Trail

### **III. Public Safety Concerns**

There are additional concerns in the area of public safety. In the event of an emergency in William B. Umstead State Park, first responders and fire trucks need access to the Park along Old Reedy Creek Road, through the gate located at 2335 Old Reedy Creek Road, and into the Park via the Reedy Creek Multi-Use Trail. A plane crash, a brush fire, and injured park patrons are all examples of recent incidents that have required access to the park along RCMUT. Having a fence sever RCMUT would prevent such access in the future.

## IV. Good Governance Process Should be Followed Employing Alternative Solutions

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Environmental permits should not be the first step, particularly in a controversial project that would do great harm to other public properties. First steps should instead include public evaluation of priorities, goals, objectives, collaboration with stakeholders, master planning, and alternative evaluations. That is the process followed by RDUAA's four local government owners. Jumping ahead with environmental permits first severely hinders the decision-making opportunities of the RDUAA Board. Staff time and permitting expenses wasted. Better opportunities could be lost.

It was a positive and appreciated statement by RDUAA Board member David Kushner (May 20, 2021 Board meeting) that indicated key parties are in discussions to find solutions.

The Raleigh Durham Airport Authority (RDUAA) is a public body. All revenues are public funds. The proposed expenditure of \$4,000,000 for the fence is questionable use of public funds. Furthermore, this expenditure is NOT in the current approved FY21-22 budget, nor listed as a priority project, nor including in any Master Planning document. Most importantly, the RDUAA Board has not vetted, nor approved this project.

The RDU airport already HAS a security fence system to protect the runway and terminals.

Further evidence that the proposed perimeter fence is not needed for airport security can be highlighted by looking at other airports. In stark contrast, the Baltimore/Washington International Thurgood Marshall Airport touts its BWI Marshall Airport Hiker-Biker trail (a 12.5-mile trail around the entire airport) as a great airport and community asset. They see no need for a perimeter fence removed from the runways and terminals. ([https://www.bwiairport.com/sites/default/files/2017-05/BWI-Trail-Map\\_2014.jpg](https://www.bwiairport.com/sites/default/files/2017-05/BWI-Trail-Map_2014.jpg))

Concerns expressed by RDUAA staff and some Board members regarding unsanctioned trail usage can be addressed. One solution: lease "286" to Wake County. Wake County would pay for environmental, sustainable trails and stream/wetland crossing, as well as liability concerns; similar to the MOA with Wake County at Lake Crabtree County Park.

Revenue Diversion, the Rules set out by the 1999 Federal Register, and how exceptions for Fair Market Value (FMV) can be allowed for Community Uses such as recreation have received attention.

A preferred solution: "save" the money and do not build the fence. That more than pays for any "lease."

Furthermore, FMV for a **lease** is usually far **less** than appraised value due to limited time frame and terms.

RDUAA should do a master planning effort that enables a coordinated vision for the non-aviation land. A conceptual themed-master plan may yield greater revenue than the piece-meal approach used to date. A greater revenue stream for the "whole" concept may yield a net benefit to airport revenues and public support.

For example, the UNC-School of Government-Development Finance initiative (DFI) study requested and paid for by the Wake County Commissioners concluded:

*“DFI conducted a preliminary financial analysis to explore the feasibility of a recreational district concept. The market analysis suggested that it should be possible to attract private investments to build the major components of the recreational district. DFI conservatively estimates that a recreation-themed development concept could catalyze roughly \$200 million in private investment. This \$200 million could generate up to \$2 million in tax revenue for Wake County. Retail space and some of the recreational facilities would also generate sales taxes. These revenue sources could finance public infrastructure improvements and maintenance related to the recreational district.”* (DFI. August 2017. Preliminary Feasibility Analysis for Recreation-Related Development, Wake County, NC. Page 36).

Supporting this themed Recreational district concept: Allegiant Airlines just “passed over” RDU Airport for lack of outdoor recreation-focused destinations. (TBJ, 5-21-2121).

Master Planning for the (non-aeronautic) land use is also consistent with a key recommendation by a Task Force requested by RDUAA. On January 17, 2020, the RDU Airport Infrastructure Development (AID) Task Force, a special Regional Transportation Alliance task force issued their report. Full report available: <https://letsgetmoving.org/priorities/rdu-funding/>. The task force made several explicit recommendations regarding the land use (e.g., non-aeronautical components of the RDU Airport facilities), including those directly related to fencing (and proposed, controversial proposed new quarry pit on Odd Fellows Tract). Key recommendations for the land use components of the airport’s Master Plan include (from p. 12 Task Force recommendations attached):

- *“RDU could do a value engineering review of entire 2040 master plan to build regional goodwill*
- *The situation surrounding RDU’s lands and adjacent Umstead Park has been a costly distraction RDU should revisit entire 2040 master plan given the reality of an adjacent, beloved state park”*

Cc:

Mike Landguth, President and CEO, Raleigh-Durham Airport Authority (RDUAA)  
Dionne Delli-Gatti, Secretary, NC Department of Environmental Quality (NC DEQ)  
Reid Wilson, Secretary, NC Department Natural and Cultural Resources (NC NCR)  
Jeff Michael, Deputy Secretary for Natural Resources, NC NCR  
Sushma Masemore, Assistant Secretary for the Environment (NC DEQ)  
Dwayne Patterson, Director, NC Division of Parks and Recreation, NC NCR  
Brian Strong, NC Division of Parks and Recreation, NC NCR  
Scott Letchworth, Park Superintendent, William B. Umstead State Park, NC NCR  
Terry Lansdell, Executive Director, BikeWalkNC  
Niles Barnes, Deputy Director, East Coast Greenway Alliance  
Sarah Sanford, Regional Coordinator for North Carolina & Virginia, East Coast Greenway Alliance  
Honorable Governor Roy Cooper  
Honorable NC Senator Wiley Nickel  
Honorable NC Senator Jay Chaudhuri  
Honorable NC Representative Cynthia Ball  
Honorable NC Representative Joe John  
Cassie Gavin, Attorney, N. C. Sierra Club  
Cynthia Satterfield, Deputy Director and Acting State Director, N. C. Sierra Club

Hwa Huang, Group Chair, Capital Group - N.C. Sierra Club  
Sarwat Khattak, President, Triangle Off -Road Cyclist (TORC)  
Dave Anderson, Board Member, Triangle Off -Road Cyclist (TORC)  
Matt Calabria, Chair, Wake County Commissioners and Wake County Commissioners  
Brenda A. Howerton, Chair, Durham County Commissioners and Durham County Commissioners  
Mary -Ann Baldwin, Mayor, City of Raleigh and Raleigh City Council Members  
Steve Schewel, Mayor, City of Durham and Durham City Council Members  
Harold Weinbrecht, Mayor, Town of Cary and Cary Town Council Members  
TJ Cawley, Mayor, Town of Morrisville, and Town of Morrisville Council Member



Division of Parks and Recreation  
NC Department of Natural and Cultural Resources

Governor Roy Cooper

Secretary D. Reid Wilson

January 25, 2021

Mr. Rick Trone  
Department of Environmental Quality  
Division of Water Resources  
1617 Mail Service Center  
Raleigh, NC 27699-1617

Dear Mr. Trone:

The Division of Parks and Recreation, within the Department of Natural and Cultural Resources (Department) appreciates this opportunity to present the following comments related to the proposed fence around Raleigh-Durham Airport Authority (RDU) Property. Due to the project's proximity to William B. Umstead State Park, the Department would like to express the following concerns related to the proposed project:

- The fence, as planned, would cut off one of the park's most popular hiking trails, the Reedy Creek Trail, which would permanently degrade the visitor experience;
- By creating a permanent eyesore along the park border and marring the look and "feel" of the park, the proposed fence would greatly harm a fundamental purpose of the park, namely, to provide public access to a natural setting for people to enjoy nature and improve their physical and mental health;
- Because the fence would cross several streams, it would damage stream buffers, wetlands, and water quality downstream in William B. Umstead State Park;
- The proposed fence would block movement of wildlife, effectively trapping animals between airport fences;
- The proposed fence may constitute an adverse effect to the park's status on the Natural Register of Historic Places, which could trigger review and requirements under federal or state law;

- Disturbed ground during fence construction will offer an introduction site for invasive exotic plant species. Continued maintenance along the fence will create a permanent invasive species establishment zone that will introduce invasive species into the park.
- Any new corridor created by the fence will facilitate access to areas not intended as a public entrance into the park. Arrangements should be made to prevent unwanted access, particularly from off road vehicles.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "John Fullwood". The signature is written in a cursive style with a long, sweeping tail on the "d".

John Fullwood

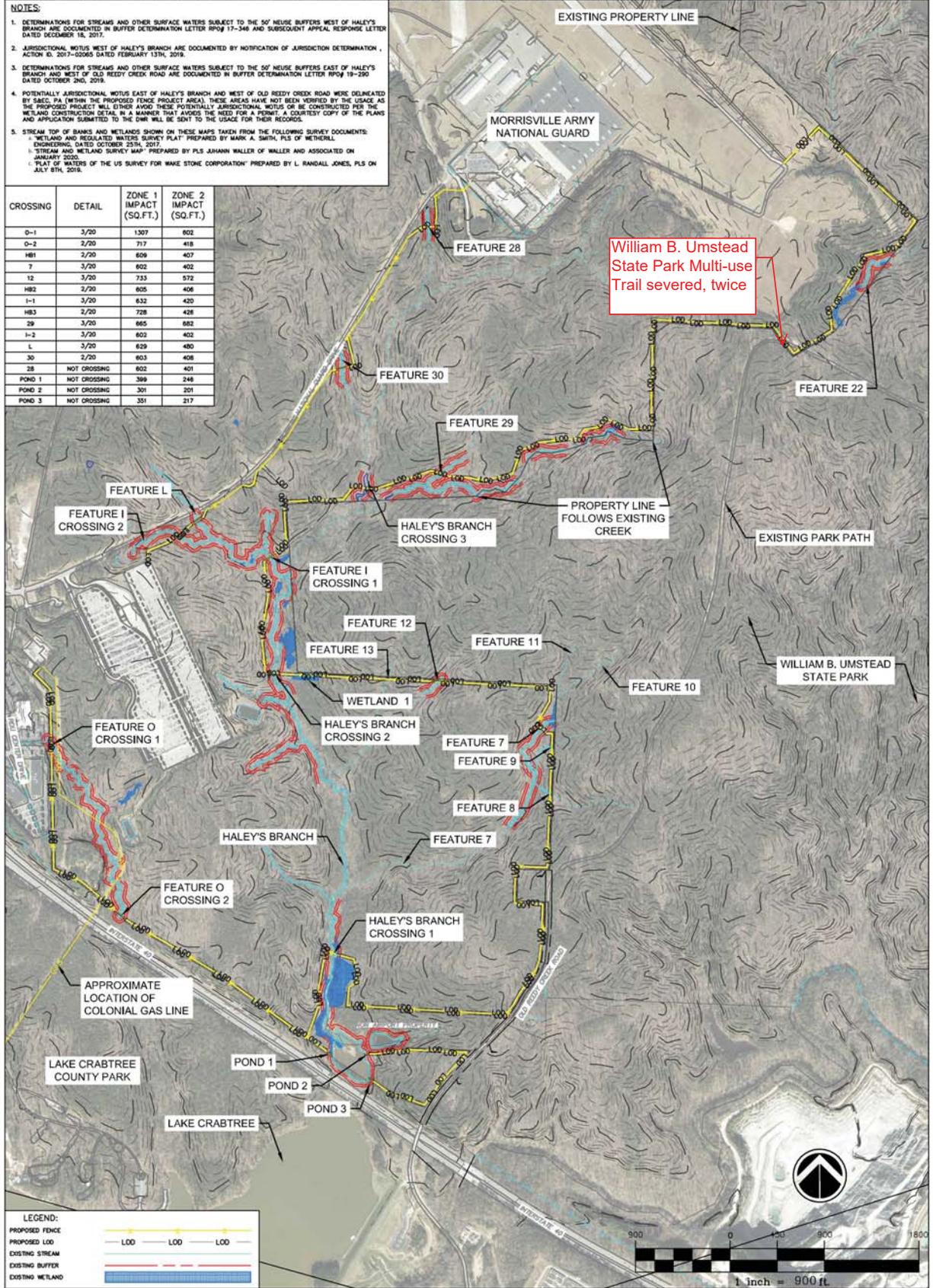
cc: Reid Wilson, Secretary, DNCR  
Sheila Holman, Assistant Secretary, DEQ  
Paul Wojoski, Permitting Branch Supervisor, DWR

FILE PATH: J:\Projects\Design-Durham (RDJ) Airport\20180220\RA - RDJ\TO #17 - Enhanced Security Perimeter\CADD - Fence\Streets Exhibit\Impact Exhibit - Overall & Details.dwg CHARRISON 12/14/2020 2:48:16 PM

**NOTES:**

1. DETERMINATIONS FOR STREAMS AND OTHER SURFACE WATERS SUBJECT TO THE 50' NEUSE BUFFERS WEST OF HALEY'S BRANCH ARE DOCUMENTED IN BUFFER DETERMINATION LETTER RPO# 17-348 AND SUBSEQUENT APPEAL RESPONSE LETTER DATED DECEMBER 16, 2017.
2. JURISDICTIONAL NOTUS WEST OF HALEY'S BRANCH ARE DOCUMENTED BY NOTIFICATION OF JURISDICTION DETERMINATION, ACTION 6, 2017-0266 DATED FEBRUARY 13TH, 2019.
3. DETERMINATIONS FOR STREAMS AND OTHER SURFACE WATERS SUBJECT TO THE 50' NEUSE BUFFERS EAST OF HALEY'S BRANCH AND WEST OF OLD REEZY CREEK ROAD ARE DOCUMENTED IN BUFFER DETERMINATION LETTER RPO# 19-290 DATED OCTOBER 2ND, 2019.
4. POTENTIALLY JURISDICTIONAL NOTUS EAST OF HALEY'S BRANCH AND WEST OF OLD REEZY CREEK ROAD WERE DELINEATED BY S&EC, P.A. (WITHIN THE PROPOSED FENCE PROJECT AREA). THESE AREAS HAVE NOT BEEN VERIFIED BY THE USAGE AS THE PROPOSED PROJECT WILL EITHER AVOID THESE POTENTIALLY JURISDICTIONAL NOTUS OR BE CONSTRUCTED PER THE WETLAND CONSTRUCTION DETAIL IN A MANNER THAT AVOIDS THE NEED FOR A PERMIT. A COURTESY COPY OF THE PLANS AND APPLICATION SUBMITTED TO THE DNR WILL BE SENT TO THE USAGE FOR THEIR RECORDS.
5. STREAM TOP OF BANKS AND WETLANDS SHOWN ON THESE MAPS TAKEN FROM THE FOLLOWING SURVEY DOCUMENTS:  
 a. WETLAND AND REGULATED WATERS SURVEY PLAN\* PREPARED BY MARK A. SMITH, PLS OF WETHERILL ENGINEERING, DATED OCTOBER 25TH, 2017.  
 b. STREAM AND WETLAND SURVEY MAP\* PREPARED BY PLS JAHMANN WALLER OF WALLER AND ASSOCIATED ON JANUARY 2020.  
 c. PLAT OF WATERS OF THE US SURVEY FOR MAKE STONE CORPORATION\* PREPARED BY L. RANDALL JONES, PLS ON JULY 8TH, 2019.

CROSSING	DETAIL	ZONE 1 IMPACT (SQ.FT.)	ZONE 2 IMPACT (SQ.FT.)
D-1	3/20	1307	802
D-2	2/20	717	418
H81	2/20	609	407
7	3/20	602	402
12	3/20	733	572
H82	2/20	605	408
I-1	3/20	632	420
H83	2/20	728	428
29	3/20	665	582
I-2	3/20	602	402
L	3/20	629	480
30	2/20	603	408
28	NOT CROSSING	602	401
POND 1	NOT CROSSING	399	248
POND 2	NOT CROSSING	301	201
POND 3	NOT CROSSING	351	217



PROJ. MGR.: JPK  
 DESIGN BY: CDH  
 DRAWN BY: CDH  
 PROJ. DATE: 12/14/2020  
 DRAWING NUMBER:  
 1 OF 20  
 WKD PROJ. NO.:  
 20180220.00.RA

PROJECT NAME: ENHANCED SECURITY PERIMETER FENCING FOR THE RALEIGH-DURHAM AIRPORT AUTHORITY  
 DRAWING TITLE: OVERALL PLAN

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**DESTINATION TRAILS**

**TO AMERICAN TOBACCO TRAIL**—14.8 miles  
via Black Creek Greenway—White Oak Greenway

**TO CLAYTON**—35 miles  
via Reedy Creek—Rocky Branch—Walnut Creek—Neuse River

**TO FALLS LAKE**—42 miles  
via Reedy Creek—House Creek—Crabtree Creek (Raleigh)—Neuse River

**LOOP TRAILS**

**LOOP 1**—12 miles  
Black Creek Greenway—White Oak Creek Greenway—Davis Drive Street-side Trail—Hatcher Grove Greenway—Crabtree Creek Greenway

**LOOP 2**—49 miles  
Reedy Creek—Rocky Branch—Walnut Creek—Neuse River—Crabtree Creek (Raleigh)—House Creek

ALL DISTANCES ARE APPROXIMATE  
Inset Area - See Panel Above



# Regional Trails

**Legend:**

- Cary Greenway
- Morrisville Greenway
- Raleigh/Wake County Greenway
- American Tobacco Trail
- Falls Lake Trail
- Natural Surface Trail
- - - Proposed Greenway
- Greenway Detour
- Parks and Natural Areas
- Stream
- Greenway Trailhead

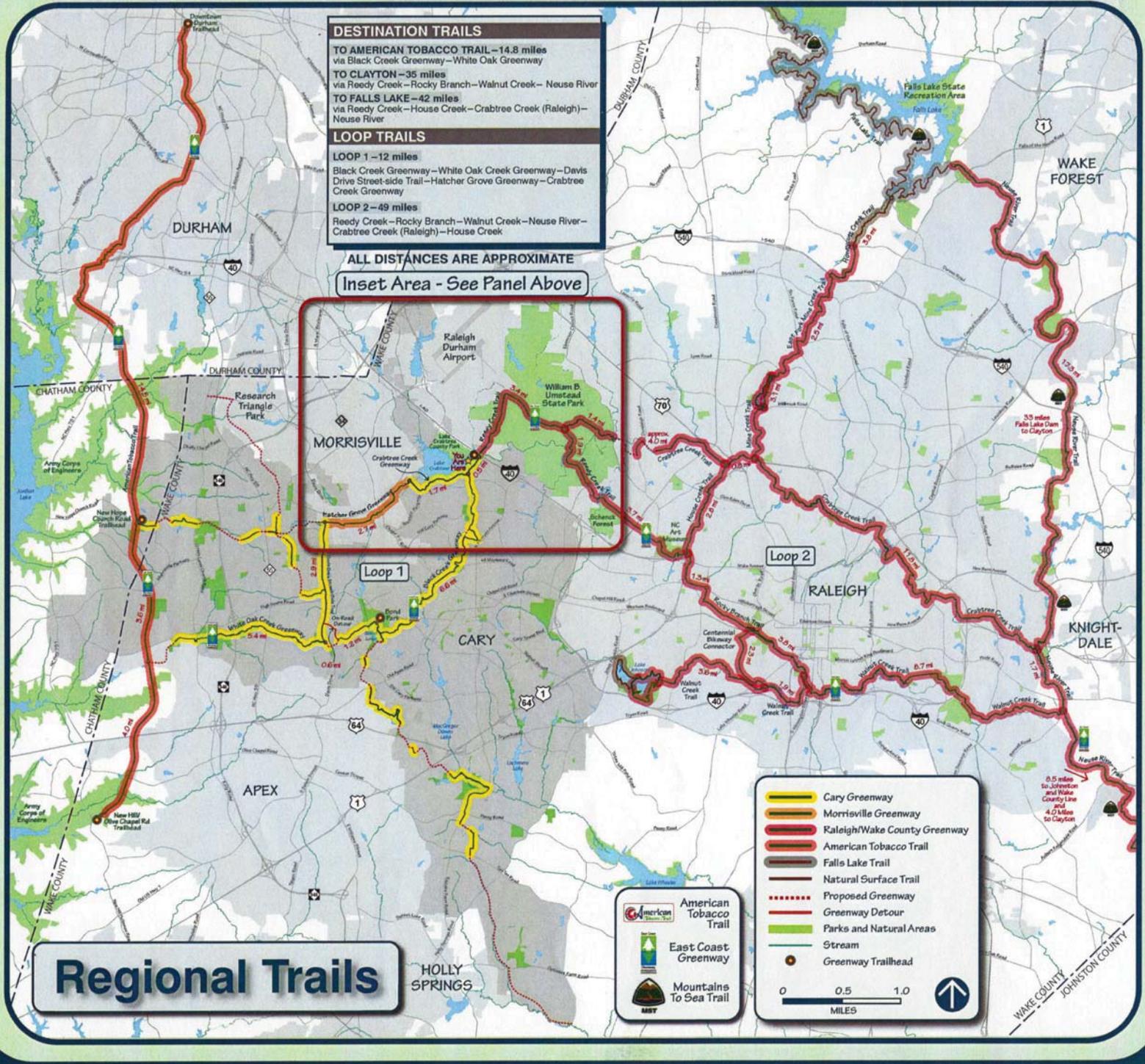
**Scale:** 0 0.5 1.0 MILES

**North Arrow:** ↑

**American Tobacco Trail**

**East Coast Greenway**

**Mountains To Sea Trail**



# Our sky could fall:

The long-term infrastructure and funding challenge facing RDU Airport – and our region

## **Preliminary task force findings and recommendations**

Regional Transportation Alliance  
RDU Airport Infrastructure Development (AID) Task Force  
January 17, 2020

*RTA is the voice of the regional business community on transportation*

Source: <http://letsgetmoving.org/priorities/air-service/rdu-master-plan/rta-rdu-aid-task-force/>

## Summary of Preliminary Recommendations of RTA RDU AID Task Force

### RDU and Local Funding Recommendations

- Continue to pursue full cost recovery of all aviation-related expenditures at RDU
- Increase existing carrier landing fees based on weight; use funds for airfield improvements
- Activate landing fees for general aviation users; use funds for airfield improvements
- Implement \$2 fee payable upon exiting the airport; use funds for RDU roadway improvements; *parking customers would not pay this fee; would be collected via transponders; revenue TBD*
- Reallocate local rental car taxes to RDU; use funds for RDU roadways and rental car facility *All local rental car taxes currently raise \$16m per year, or around \$160m per decade*
- Implement premium curbside access fees at terminals; use funds for RDU terminal improvements *this would be a premium, opt-in offering; would be collected via transponders; revenue TBD*
- Have Durham and Wake counties identify external lands that could be monetized to fund RDU
- Consider accelerating or increasing amount of bond financing, if allowed by other bond covenants and supported by additional revenues such as those identified above
- *RDU's local owners must develop or endorse sustainable funding package and own this issue*

### Airport Land Use Recommendations

- RDU property is a valuable resource that should be managed to generate revenue for the airport
- RDU has the responsibility to leverage its property for compatible and complementary uses *Create RDU Real Estate Master Plan with specific timelines, financial requirements; Hire master developer to review entire airport for strategic development opportunities*
- Consider creation of a new "terminal 3" – north of terminal 2, away from Umstead State Park *Terminal 3 could be primarily focused on expanded international service offerings; Offer airlines opportunity to build, fund, and operate terminal 3 – and share in capacity risk*
- RDU could consider relocating crosswind (14-32) runway; evaluate compatible uses of that land
- RDU could do a value engineering review of entire 2040 master plan to build regional goodwill
- **The situation surrounding RDU's lands and adjacent Umstead Park has been a costly distraction RDU should revisit entire 2040 master plan given the reality of an adjacent, beloved state park**
- RDU may not be a natural partner with Umstead, but it needs to become one – and vice versa *Ask NC DNCR to authorize mountain biking in Umstead State Park at an appropriate location*

### State Funding Recommendations

- Thank legislature for significant, ongoing investment in North Carolina's commercial airports *State funding generates around \$17m annually for RDU, or around \$170m per decade*

### Federal Funding and Policy Recommendations

- Propose nominal PFC increase of \$1 (to \$5.50); then index PFCs to inflation going forward *A \$1 PFC increase would provide \$6m annually for RDU, or around \$60m per decade*
- Rather than uncapping PFCs, authorize increases above these levels only with airline approval(s)
- *Do not focus on large PFC increases, as the conflict between airports and airlines appears to be unresolvable and a distraction from needed federal action on areas like FAA approval timelines*
- Lobby for accelerated FAA environmental approvals (max 3 years) via airports/airlines coalition

### Overall Recommendation:

*Expediently identify, approve, and activate a sustainable funding structure to address the \$1-\$2 billion funding gap at RDU over the next two decades to ensure the long-term success of RDU and the region.*