



The Umstead Coalition

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<http://umsteadcoalition.org>

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*B.W. Wells Association
Capital Group Sierra Club
Eno River Association
Friends of State Parks
Headwaters Group Sierra Club*

*New Hope Audubon Society
Neuse Riverkeeper Foundation
NC Herpetological Society
NC League Conservation Voters Foundation
NC Wildlife Federation*

*NC Native Plant Society
Orange-Chatham Group Sierra Club
Raleigh Ski and Outing Club, Inc.
Rockingham Naturalist's Club
Friends of Jockey's Ridge
Wake Audubon Society*

March 11, 2021

MEMORANDUM

To: Raleigh-Durham Airport Authority (RDUAA) Board Members

Re: 2021-2022 RDUAA Budget, Public Hearing Public Comments

Thank you for representing our community on the RDUAA Board and your service to improve the Raleigh-Durham International Airport as a vital partner. Your consideration of Public Comments regarding the draft Budget in advance of Board approval is appreciated.

The Umstead Coalition is focused upon serving and protecting William B. Umstead State Park. William B. Umstead State Park was established in 1934 and is one of most visited NC State Parks, many of which access the Park via the Old Reedy Creek Road Recreational corridor that connects Lake Crabtree County Park to William B. Umstead State Park. Like the airport, William B. Umstead State Park is a great community asset. William B. Umstead State Park and the Raleigh-Durham International Airport share 6.2 miles of common boundary. Storm water from the entire airport drains directly or indirectly (through Brier Creek and Lake Crabtree) into William B. Umstead State Park. The extent of our shared property boundary and environmental sensitive issues has sometimes caused controversy, but also can and has led to opportunities. When all the stakeholders have worked together in the past, the airport, the Park, and its connected Parks and greenways have thrived. That enables an environment that attracts and retains employers, employees, and visitors, which in turn lends to an enhanced economic environment for our communities to grow and prosper.

Please accept these Public Comments in the vein of trying to improve the airport and its ability to be a good neighbor and community partner. Please consider the following suggestions in your deliberations of your budget decisions:

Capital Projects

- **080799 Expanding Park Economy 3 (\$35,618,000). 3,000 space at-grade public parking lot.** This appears to be one of the projects that RDUAA promised the FAA would NOT be pursued (it is an environmentally consequential project on the eastern side of the airport). This is one of the controversial projects on the east side of the airport due to its design and potential impact to William B. Umstead State Park. These funds were allocated in previous years, but could better be reassigned to other more critical projects.

The RDUAA committed to the FAA that it would NOT put forth projects on the William B. Umstead State Park side of the airport. This reasoning was the basis for the FAA to avoid an EIS. This line item should be deleted, or it should trigger a FULL EIS by the FAA to include this parking lot expansion with the proposed replacement runway to the west.

♥ The Umstead Coalition ♥

Dedicated to preserving the natural integrity of W.B. Umstead State Park and the Richland Creek Corridor

- **211140 Enhanced Security Gates. (\$3,000,000)** (The narrative implies this is at the property perimeter with "Enhanced Security Perimeter Gates (TSA) - \$3,000,000 - Design and construction of various security enhancements around the perimeter of RDU."). If this is related to new fencing at the boundary with William B. Umstead State Park, we would view as problematic and should be deleted. If this funding is for the EXISTING security fencing protecting the terminals, airfield, parking areas, and related, then we have no objections. If for existing security fencing, that should be clarified in the budget narrative.

(p. 22) Improvements to the Goal – Cultivate Mutually beneficial Business and Community Partnerships.

To meet the goal of “Community Partnerships” it would be beneficial to engage in “two-way” dialogs with local governments, business stakeholders, public, and landowners. The listed Tactics (e.g., PR Firm) seem devoid of this critical “two-way” dialog. Only pursuing a “one-way” PR campaign is seen by the public as being “told” and not fostering meaningful community engagement.

Suggested ideas to include:

- Return the (in-person) Public Comment period during the monthly RDUAA Board meetings
- Articulating specific analyses, alternative analyses and responses to Public Comments made on projects with Public Input (e.g., strategic planning, Environmental Assessments (EA) and Environmental Impact Studies (EIS).
- Add funds to do a complete revamp of your non- aeronautical land use Master Plan as per the recommendation of the Regional transportation Alliance-RDU Airport Infrastructure Development (RDU-RTA AID) Task Force. RDUAA did extensive evaluations of alternatives for the runways and terminal portions of the Vision 2040. However, NOTHING for the non-aeronautical lands uses. Your own consultant told us that that was not in her “work scope.” This lack of evaluating alternatives and ignoring massive public input and suggestions have cascaded into extremely depressed “community goodwill” (as your RTA Task Force relayed as a “costly distraction” and recommended a redo of the land use Master Plan).
- Prioritizing listing and criteria for prioritizing projects should be clearly indicated. NCDOT, CAMPO, your owning municipalities all do this. This criteria used for project prioritization is a matter of good governance and stewardship of public funds. Furthermore, as NCDOT and CAMPO practice, the criteria for prioritization should undergo public comment evaluation.

(p24) Improvements to the Goal- Operate a Safe, Secure and Environmentally Responsible Airport

This is a commendable goal. The current efforts in Sustainability Management for energy consumption and recycling are appropriate, but too limited and narrowly focused. Environmental sustainability should include management of resources and land management. Suggestions to expand and improve include:

- Improve land management to minimize runoff (nutrients, sediment, deicing chemicals) to William B. Umstead State Park.
- Improve storm water management from the runways, terminals, and all other areas. The entire RDU Airport drainage goes into William B. Umstead State Park. Nutrients, sediments, deicing chemicals and toxins should be managed, not just dispersed. Currently, William B. Umstead State Park’s streams, lakes, and wildlife are negatively impacted. Specifically:
 - What is RDUAA’s plan to handle PFAS chemical runoff?

- What is RDUAA's plan to minimize nutrient runoff and movement off airport property?
- Expand your Sustainability Management Plan to include more efficient use of resources. Other airports around the country are succeeding in this effort, RDU can as well.

Projects Which Negatively Affect Umstead State Park

We are pleased to observe that some controversial projects were delayed in the FY20-21 budget and are not included in your current budget, but previous appropriations seem to remain and planning continues. These projects should be reevaluated and either removed or assigned for later consideration to mediate negative impacts to Umstead State Park.

- **211130, Perimeter Security Fence (\$4M). There appear to be on-going design and consultant expenses (exceeding the \$100K limit needing Board approval)** for this disastrous perimeter fence, far removed from airport operational facilities, along the environmentally sensitive border of William B. Umstead State. The proposed fence would cause irreparable damage with trail disconnection, water quality, habitat fragmentation; visibility impacts to our Public Park and to the US1 Bike Route and East Coast Green connection of the Old Reedy Creek Road Recreational Corridor (see attached NC State Park letters opposing this proposed fence).

There is an existing system of security fencing, structures, and other barriers that protect the terminals, airfield, parking areas, and related aeronautic facilities.

Please listen to NC State Parks, your citizens, your local government owners, etc. and cease efforts to obtain a Neuse Buffer Authorization through NCDEQ. This was already denied and DEQ has clearly stated their severe concerns for this project. We would like to correct the adversarial relationship that exists between the airport and conservation interests. This includes discontinuing efforts by your consultants to continue pushing for this project.

- **Terminal 1 Gate Expansion** (beyond the extra 4 gates that were part of Vision 2040 and already implemented). This would force more aircraft to the runway closest to William B. Umstead State Park. Expansion of T1 would increase air traffic's negative impacts to Umstead State Park. Your promise to the Public in Vision 2040 was for the Expansion of the airport operations to be to the WEST, away from William B. Umstead State Park. Hence, why the public was supportive of the replacement runway to the west, expansion of all but four (4) new gates at T2. The public does NOT support more air traffic negatively impacting Umstead State Park.
- **881430 Commerce Bld and East GA Perimeter.** This is a major concern to construct a thoroughfare that would run along the environmental sensitive boundary of William B. Umstead State Park with grave environmental consequences for our Park.

Please acknowledge receipt of our comments, and let us know if there are any questions. We sincerely hope that we can work to strengthen our relationship and collaborate on issues that may affect William B. Umstead State Park. An improved working partnership benefits all parties, and the respective communities you represent.



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



**North Carolina Department of Natural and Cultural Resources
Office of the Secretary**

Governor Roy Cooper

Secretary Susi H. Hamilton

January 15, 2020

Mr. Michael Landguth
President and Chief Executive Officer
Raleigh-Durham Airport Authority
1000 Trade Drive
Morrisville, NC 27560

Dear Mr. Landguth:

Thank you for meeting with representatives of the North Carolina Department of Natural and Cultural Resources and North Carolina State Parks last week regarding RDU's proposed fence adjacent to William B. Umstead State Park. The Department appreciates this opportunity to address some of our concerns regarding a potential fence and propose working toward alternative solutions.

The Department understands RDU's need to control trespassing and prevent the unauthorized construction and use of mountain bike trails on airport property for legal and environmental reasons. However, a fence as proposed presents multiple problems for the park and its users:

- The proposed fence would bisect the park's popular Reedy Creek Multi-Use Trail in two places; the trail is used by tens of thousands of hikers, cyclists and equestrians every year, and it would be far too expensive for State Parks to move the trail;
- By creating a permanent eyesore 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;
- This degradation of the visitor experience would likely create among trail users an ongoing negative impression of the airport;
- Because the proposed fence would cross four large streams, 19 small streams, and 29 temporary streams or ditches, it would damage stream banks, wetlands, and water quality downstream in Umstead Park;
- The proposed fence would block movements of wildlife, effectively trapping them between airport fences;

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- The proposed fence may constitute an adverse effect to the park's status on the National Register of Historic Places, which could trigger review and requirements under federal or state law.

The Department requests that RDU postpone finalization of plans for the fence until three potential alternatives can be more thoroughly considered for long-term implementation or as a 12-18 month pilot project.

First, State Parks could provide enhanced law enforcement at common biker ingress points to prevent trespassing. State law (N.C. Gen. Stat. §§ 113-28.2 and 143B-135.16) and regulation (07 NCAC 13B .0501) already authorize State Parks rangers to enforce state law on park property and specifically to issue citations for use of bicycles where prohibited. N.C. Gen. Stat. §§ 113-28.2A and 160A-288 also allow rangers to assist in enforcing state law in other jurisdictions if requested by the law enforcement agency for that other jurisdiction. While current staffing levels would need to be increased to provide effective coverage, the Department is willing to enter into a memorandum of agreement to create new ranger positions funded by the Airport Authority. For far less than the cost of the fence, RDU could support the cost of additional rangers needed for such enforcement action. We believe that enhanced law enforcement presence, coupled with strong public communication alerting bikers that citations will be issued to those illegally accessing RDU property, can serve as an effective deterrent.

Second, the Department is interested in working with RDU and our respective state and federal partners to pursue a purchase of the "286 property" affected by mountain biking, and to add it to the park. While current space restraints and demand for multi-use trails prevent the park from replicating the unauthorized bike trails within the park's existing boundaries, the park could provide single-use trails dedicated to biking on the 286 property if it was acquired by the state. We understand that federal restrictions and approvals may complicate such a transaction, but believe thorough exploration is warranted in the interest of a permanent, beneficial solution.

Finally, the Department stands ready to work with RDU and Wake County should RDU lease to the county some or all of the 286 property. State Parks and the county could work together on enforcement and management of trails on the property.

Thank you again for meeting with us, and we look forward to further discussions that we hope will produce a workable solution.

Sincerely,



D. Reid Wilson
Chief Deputy Secretary