

February 25, 2008

Mr. Iftikhar Ahmad
Dayton International Airport
3600 Terminal Drive, Suite 300
Vandalia, OH 45377

Re: Lease with the Aullwood Audubon Center and Farm

Dear Mr. Ahmad:

We are writing to express our concern about the letter that you received, dated September 17, 2007 from Irene R. Porter, Program Manager for the Detroit Airports District Office of the Federal Aviation Administration. We recently received a copy of this letter, which is apparently the basis for the Airport's decision not to extend the above lease.

Ms. Porter's letter appears to be based on some fundamental misunderstandings of the history and nature of the Paul E. Knoop, Jr. Prairie, which we have developed on the land described in the lease. It also does not appear to be consistent with either the Circular referred to in the letter or the basic science of prairie ecosystems.

Before addressing the problems with the letter, we want to assure you that we are as committed as you and the FAA are to ensuring the safety of the public traveling into and out of the Airport. Given the various uses to which the leased land could be put, we believe that continued management of the land as a prairie actually reduces the risk to planes posed by birds and other wildlife, as opposed to the risks inherent in other uses of the land.

Ms. Porter's letter responded to a letter dated May 8, 2007 from Jonathon Vrabel of your staff. In his letter, Mr. Vrabel tells Ms. Porter that Aullwood has expressed an interest in using the land in question "for the purpose of creating a wildlife prairie and preserve." He goes on to describe the plants that Aullwood would place on the land "to create a nature preserve to attract different types of birds and wildlife." In response, Ms. Porter says that Aullwood's proposal "would allow the Center to create a wildlife prairie and preserve."

As you know, the Paul Knoop Prairie has been in existence for approximately 15 years. Our latest request for a lease extension does not involve any plan to change the landscape that has already been in existence for most of that period. We are not trying to "create" anything that is not already there. Moreover, the prairie was not designed to "attract different types of birds and wildlife" or to create a "wildlife prairie and preserve." The purpose of the Prairie has always been to restore a habitat type that was once far more common in Southwest Ohio. In other words, our focus is and always has been on the plant community in the Prairie. While a prairie ecosystem, like every other ecosystem (including mowed grass), attracts certain types of wildlife, the Knoop Prairie is not designed to attract more wildlife to the area, but rather to re-create a plant community that has vanished from much of its historic range in Ohio.

Given the impression left by Mr. Vrabel's letter, namely, that Aullwood wanted to "create" a new habitat type that would "attract" new birds and wildlife, we certainly understand Ms. Porter's concern. We assume she is not familiar with the nature or history of the Prairie, and may never have seen it. The lease extension, however, would not result in any change to a landscape that has already been in place for many years.

Ms. Porter refers to an FAA Circular that she says "states that all areas that attract wildlife should be located a minimum of 10,000 feet from airports utilized by jet aircraft (emphasis added)." We have examined the Circular, however, and it does not place such a blanket prohibition on "areas that attract wildlife." Rather, the Circular identifies certain specified types of land uses that should not be located within the 10,000-foot radius. Prairies such as the Knoop Prairie are not among the land use types that are excluded.

We are not surprised that prairies were not included in the land use types identified in the Circular. Assuming that the FAA does not propose simply to pave over all land within 10,000 feet of airports utilized by jet aircraft (an area that would encompass many square miles), the land use in such areas, whether as farm, golf course, soccer field, or suburban neighborhood, will always attract some form of wildlife. The question thus is not whether the Knoop Prairie attracts wildlife – it clearly does – but whether the wildlife attracted provides a greater or lesser threat to aircraft than would be the case from some other use of the land.

We are confident that alternative uses of this land would create greater dangers to aircraft than the present use. Changing the property to a mowed field, for example, would likely attract gulls and Canada geese which, we understand, present a greater threat to aircraft than the small birds that presently reside in the Prairie. Moreover, if the Airport took back the Prairie and converted it to a mowed field, it would bear the cost of managing the land, a cost currently absorbed by Aullwood. 150 acres is a large area to mow.

We would therefore ask that the Airport initiate a dialogue with Ms. Porter, the airport and Aullwood based on the actual nature and history of the Knoop Prairie. We are so confident that a study of the wildlife attractant effects of alternate uses of the land in question would demonstrate that the current Prairie is in fact the best use of the land in question that we would be willing to add language to the lease that the land be managed in a manner consistent with all applicable FAA regulations and policies. Indeed, a rational study of the Prairie may well lead the FAA to promote such prairies as a preferred land use near other airports. Again, we simply ask the decisions be made based on sound science rather than on misimpressions of the nature and history of the Prairie.

We look forward to receiving your response.

Sincerely,

Charity Krueger
Executive Director, Aullwood Audubon Center and Farm

Cc: Nan Whaley; Frank Hollingsworth; Jerry Tinianow