



U.S. Department
of Transportation
**Federal Aviation
Administration**

Orlando Airports District Office
8427 SouthPark Circle, Suite 524
Orlando, FL 32819
Phone: (407) 487-7720
Fax: (407) 487-7135

September 27, 2023

[via email to: jhurst@co.okeechobee.fl.us]

Mr. John L. Hurst
Airport & Commerce Park Director
Okeechobee County Airport & Commerce Park
2800 NW 20th Trail
Okeechobee, FL 34972

RE: Proposed Lower Kissimmee Basin Stormwater Treatment Area (LKBSTA)
Okeechobee County, Florida

Dear Mr. Hurst,

We have reviewed the proposed development of a surface water treatment facility that would be developed in the vicinity of the Okeechobee County Airport (OBE). Based on the information provided, the project would take water from the Kissimmee River and circulate the water through a series of man-made wetlands/marshes to remove phosphorus and other nutrients. Once treated, the water would be discharged back into the river.

Okeechobee County Airport is a public-use airport that is used by a wide variety of aircraft, including business jets. A portion of the proposed water quality treatment project site is located within five miles of the airport and on the extended centerline of Runway 5-23, the airport's primary runway. The site is located under a segment of the non-precision instrument approach procedure for Runway 5. The same area is traversed by many aircraft departing the airport on Runway 23.

FAA Advisory Circular (AC) 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports*, provides guidance on certain land uses that have potential to attract hazardous wildlife on or near public-use airports. Hazardous wildlife can threaten aviation safety. The FAA recommends this guidance for airports that receive funding under Federal grant assistance programs. The FAA urges regulatory agencies and planning and zoning agencies to evaluate proposed new land uses within the separation criteria and prevent the creation of land uses that attract or sustain hazardous wildlife within the separation distances. For all airports, the FAA recommends a distance of five miles between the closest point of the airport's aircraft operations area and the hazardous wildlife attractant. Special attention should be given to hazardous wildlife attractants that could cause hazardous wildlife movement into or across the approach or departure airspace.

Based on FAA's initial review, the proposed water quality treatment project does not fully comply with the hazardous wildlife attractant separation distances, as outlined in AC 150/5200-33C. It is FAA's understanding the proposed water quality treatment project will pump water from the Kissimmee River and release the water into cells containing man-made wetlands and marsh habitat. The river water would flow through the cells and nutrients (phosphorus) would be filtered and absorbed by the wetland vegetation. This man-made wetland and marsh habitat is likely to attract a wide variety of wildlife, including avian species hazardous to aviation activity.

As noted in section 2.3.5 of AC 5200-33C, artificial marshes and submergent and emergent vegetation may be used by flocking species of blackbirds and waterfowl for breeding and roosting activities. The FAA recommends against establishing artificial marshes within the separations identified in the AC. Wetlands, including constructed wetlands, can also be attractive to many types of wildlife, including many of which rank high on the list of hazardous wildlife species listed in Table 1 in 1AC 50/5200-32B, *Reporting Wildlife Aircraft Strikes*. Table 1 in this AC includes a composite ranking (1 equals most hazardous and 50 equals least hazardous) and the relative hazard score of fifty wildlife species with at least 100 reported strikes with civil aircraft based on three criteria (damage, major damage, and effect-on-flight).

Qualified Airport Wildlife Biologists conducted hazardous wildlife surveys at OBE in September 2016. A total of 2,909 individual birds comprised of 27 species were observed during the surveys at OBE. Of all the observations, 71 percent were wading birds, including cattle egrets, white ibis, sandhill cranes, and great blue herons. Cattle egrets and white ibis were considered the most hazardous species at OBE at that time due to their large flock size. The LKBSTA, as described, will be very desirable habitat for wading birds. The existing South Florida Water Management District (SFWMD) STAs are coveted for both their bird watching and waterfowl hunting opportunities.

Based on the existing data for OBE and south Florida STAs, the FAA recommends that the proposed water treatment facility is located outside the 5-mile separation distance from OBE. If there is no alternative to the proposed water quality treatment project location, the state agencies having approval authority over the proposed project, in cooperation with Okeechobee County and the FAA, should consult a Qualified Airport Wildlife Biologist to develop potential mitigation strategies should the LKBSTA create a wildlife hazard for the airport. Mitigation strategies can identify both design and operational measures to be employed to ensure aviation safety.

Thank you for reaching out to advise our office of the proposed project. If you would like to discuss our concerns further, you can contact me at (407) 487-7296 and peter.m.green@faa.gov.

Sincerely,

Peter Matthias Green

Digitally signed by Peter

Matthias Green

Date: 2023.09.27 15:43:05 -04'00'

Peter M. Green, AICP
Environmental Protection Specialist
Orlando Airports District Office

Richard Reade

Subject: FW: BOCC 2nd Letter Opposing the Lower Kissimmee Basin STA Project - SFWMD - Sept 28, 2023.docx
Attachments: BASH_website_data_2020_class_A_B_C_D_Mishaps_by_FY.pdf; BASH_website_data_2020_Wildlife Strikes Phase of Operation.pdf

From: MACLAUGHLIN, CHARLES E CIV USAF ACC 598 RANS/RMD [mailto:charles.mclaughlin.1@us.af.mil]
Sent: Wednesday, September 27, 2023 10:01 AM
To: Deborah Manzo <dmanzo@co.okeechobee.fl.us>
Cc: Richard Reade <rreade@co.okeechobee.fl.us>; Jennifer Codo-Salisbury - CFRPC <jcodosalisbury@cfrpc.org>
Subject: RE: BOCC 2nd Letter Opposing the Lower Kissimmee Basin STA Project - SFWMD - Sept 28, 2023.docx

Good morning Deborah,

My apologies for not replying sooner. The Florida Wildlife Corridor "Corridor Connect" conference has been very dynamic and has been an opportunity to connect with quite a few colleagues from the conservation and planning worlds.

Thank you for the information regarding the proposed SFWMD Lower Kissimmee Basin STA Project. From an Avon Park Air Force Range perspective, the proposed location is underneath several of the low-altitude Military Flight Routes (MTRs) and could cause an increased Bird Aircraft Strike Hazard (BASH) risk to military pilots flying the routes. Specifically, the proposed STA project would be underneath Instrument Route (IR) 49 and 50 and Visual Route (VR) 1087 and 1088.

As requested by Commissioner Hazellief, please see the attached BASH data from the Air Force Safety Center. For reference, Class A – D is a system of classifying the severity of the mishap with Class A being the most serious. More information can be found at <https://www.safety.af.mil/Divisions/Aviation-Safety-Division/BASH/#:~:text=The%20Bird%20Wildlife%20Aircraft%20Strike%20Hazard%20%28BASH%29%20Team%27s%20goal,for%20worldwide%20on-site%20and%20remote%20technical%20BASH%20assistance.>

Fortunately, the Range has not had any reported bird strikes in several years so I do not have any additional information specific to Avon Park AFR or the referenced MTRs.

Thank you for the opportunity to share this information. I hope it helps inform the BoCC.

Please let me know if you have any questions or would like additional information.

Very Respectfully (V/R),

Buck

Charles "Buck" MacLaughlin, Civ, USAF
Range Operations Officer
Avon Park Air Force Range, FL
813-857-7109

From: Deborah Manzo <dmanzo@co.okeechobee.fl.us>
Sent: Monday, September 25, 2023 4:44 PM
To: MACLAUGHLIN, CHARLES E CIV USAF ACC 598 RANS/RMD <charles.mclaughlin.1@us.af.mil>
Cc: Richard Reade <rreade@co.okeechobee.fl.us>

Subject: [Non-DoD Source] RE: BOCC 2nd Letter Opposing the Lower Kissimmee Basin STA Project - SFWMD - Sept 28, 2023.docx

Charles, thank you for reviewing the letter regarding the Lower Kissimmee Basin Stormwater Treatment Area and the impact it may have on your operations. Commissioner Hazellief asked if you could provide information on plane crashes that occurred due to bird strikes; he recalls there were two planes that crashed on his family's property due to bird strikes.

Thank you again.

Deborah S. Manzo, County Administrator

BASH Class A, B, C, & D Mishaps by Fiscal Year

Current as of October 2020

Year	Class A Mishaps	Class B Mishaps	Class C Mishaps	Class D Mishaps	Destroyed Aircraft	Fatalities
FY00	1	8	45	0	1	0
FY01	2	7	47	0	0	0
FY02	1	5	33	0	0	0
FY03	3	3	32	0	2	0
FY04	1	6	44	0	1	0
FY05	3	9	56	0	0	0
FY06	2	2	63	0	1	0
FY07	6	16	73	0	1	0
FY08	0	12	82	0	0	0
FY09	1	16	79	0	0	0
FY10	1	2	34	0	0	0
FY11	0	4	38	0	0	0
FY12	0	1	39	23	0	0
FY13	3	3	43	48	2	0
FY14	1	3	53	36	1	4
FY15	3	4	59	39	0	0
FY16	3	9	55	35	1	0
FY17	1	6	60	44	0	0
FY18	2	2	60	50	1	0
FY19	0	5	74	40	0	0
Total	34	123	1069	315	11	4

Wildlife Strikes by Phase of Operation (Object #1)

FY2000 - FY2019

Phase of Ops Tier 1	Count	% of Total	Total Mishap cost (Excluding Injuries)	Total Mishap Cost with Injuries
No Data	22,556	36.61%	\$236,119,486	\$236,119,726
Unknown	10,349	16.80%	\$2,693,868	\$2,693,868
Landing-Normal	5,592	9.08%	\$16,244,191	\$16,244,191
Approach-Final	4,934	8.01%	\$32,690,276	\$32,690,276
Low-Level	3,909	6.34%	\$177,536,249	\$180,500,411
Blank	3,377	5.48%	\$80	\$80
Take Off	3,308	5.37%	\$37,510,203	\$37,510,443
Traffic Pattern	2,731	4.43%	\$9,050,036	\$9,058,411
Initial Climb	1,262	2.05%	\$15,915,210	\$15,915,210
Enroute	1,210	1.96%	\$11,969,258	\$11,969,258
Go-Around	797	1.29%	\$48,873,813	\$48,873,933
Approach-Initial	348	0.56%	\$3,294,169	\$3,294,169
Ground Operations	332	0.54%	\$1,019,085	\$1,019,085
Air Work	305	0.49%	\$10,828,255	\$10,828,255
Air To Ground	209	0.34%	\$20,482,753	\$20,482,753
Landing-Tactical	109	0.18%	\$119,838	\$119,838
Aerial Delivery	99	0.16%	\$1,299,404	\$1,299,404
Air To Air	43	0.07%	\$628,381	\$628,381
On Station	34	0.06%	\$0	\$0
Flight Demonstration	29	0.05%	\$1,916,027	\$1,916,027
Orbit	26	0.04%	\$11,410	\$11,410
Air Refuel-Probe/Drogue	13	0.02%	\$141,670	\$141,670
Hover	12	0.02%	\$0	\$0
Landing-Emergency	12	0.02%	\$0	\$0
Air Refuel-Boom/Recepticle	8	0.01%	\$445,670	\$445,670
Simulated Flame Out	6	0.01%	\$0	\$0
Maintenance	4	0.01%	\$0	\$0
Autorotate	3	0.00%	\$13,380	\$13,380
Total	61,617	100.00%	\$628,802,712	\$631,775,849

From: [Hatim, Abdul](#)
To: [John Hurst](#); [Gallon, Dawn](#)
Cc: [Roberts, David](#); [Keith, Andy](#); [Smith, Kristi](#); [Scott, Brady](#); [Deborah Manzo](#); [Richard Reade](#)
Subject: RE: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport
Date: Monday, October 16, 2023 1:59:56 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

John,

We have reviewed the Lower Kissimmee Basin Stormwater Treatment Area project information and some supplemental information available to us. The letter from the ADO outlines the FAA information and comments and should, of course, be submitted to SFWMD and possibly Ecosystem Investment Partners (EIP). Some of the additional documentation we have reviewed indicates that the phosphorus removal will be an absolute priority. At least one conservation group has reported that current phosphorus levels entering Lake Okeechobee are five times higher than its assimilative capacity. That said, we believe there may be an option to remove the same or greater amounts of phosphorus with designs that are less attractive to wildlife if the project footprint cannot be shifted outside the zones that concern the FAA.

The documents provided from the EIP presentations indicate the construction will be shallow marsh with treatment water pumped in from either of two canals. Some of the marsh is located under the final approach fix (CORDI) for Runway 5 where jet or piston traffic will be as low as 1500 feet and descending on the instrument approaches and possibly lower on visuals. In lieu of the shallow marsh, it may be possible to construct a series of parallel, deep, steep-sided canals less attractive to birds and very efficient at phosphorus removal by sedimentation and sequestration. The demonstration project for an FAA pond at Naples Airport provided monitoring data and verified methodologies that can be directly used to design and construct such a system.

Our suggestion is a joint meeting with SFWMD, EIP, Okeechobee Airport, FAA (if available), FDOT, and our water management consultants to discuss options that can both reduce the phosphorus loads significantly and minimize wildlife hazards to landing and departing aircraft.

Sincerely,

Abdul Hatim, Ph.D.
Airport Engineering Manager
FDOT Aviation Office
605 Suwannee Street, MS 46
Tallahassee, FL 32399-0450
Phone: (850) 414-4504
Fax: (850) 414-4508
Email: abdul.hatim@dot.state.fl.us



From: John Hurst <jhurst@co.okeechobee.fl.us>
Sent: Monday, October 9, 2023 5:47 PM
To: Hatim, Abdul <Abdul.Hatim@dot.state.fl.us>; Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>
Cc: Roberts, David <david.roberts@dot.state.fl.us>; Keith, Andy <Andy.Keith@dot.state.fl.us>; Smith, Kristi <Kristi.Smith@dot.state.fl.us>; Scott Brady <sbrady@eg-solutionsinc.com>; Deborah Manzo <dmanzo@co.okeechobee.fl.us>; Richard Reade <rreade@co.okeechobee.fl.us>
Subject: RE: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

Abdul,

I wanted to clarify the Stormwater Treatment Area project so you have the correct information. EIP purchased the property and proposed a Stormwater Treatment Area project to SFWMD that would reduce phosphorus. EIP has provided a cost to SFWMD for the project, however, they are not paid by how much phosphorus they remove, they submit the cost of their project and estimate the amount of phosphorus that would be reduced.

Best Regards,

John L. Hurst
Airport & Commerce Park Director
Okeechobee County Airport & Commerce Park • 2800 NW 20th Trail • Okeechobee, FL 34972
Office: 863-467-5505 • Cell: 863-634-1474
Email: jhurst@co.okeechobee.fl.us

From: John Hurst
Sent: Friday, October 6, 2023 3:55 PM
To: 'Hatim, Abdul' <Abdul.Hatim@dot.state.fl.us>; Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>
Cc: Roberts, David <david.roberts@dot.state.fl.us>; Keith, Andy <Andy.Keith@dot.state.fl.us>; Smith, Kristi <Kristi.Smith@dot.state.fl.us>; Scott Brady <sbrady@eg-solutionsinc.com>; Deborah Manzo <dmanzo@co.okeechobee.fl.us>; Richard Reade <rreade@co.okeechobee.fl.us>
Subject: RE: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

Hi Abdul,

Ecosystem Investment Partners (EIP) purchased the land and is doing the project working with SFWMD. DEP is also helping to fund the project. I understand that EIP is paid for how much phosphorus they remove.

Per your request, I have attached a number of documents with plans and details about the project.

Please let us know if you have any additional questions, and what assistance you can provide.

Best Regards,

John L. Hurst

Airport & Commerce Park Director

Okeechobee County Airport & Commerce Park • 2800 NW 20th Trail • Okeechobee, FL 34972

Office: 863-467-5505 • Cell: 863-634-1474

Email: jhurst@co.okeechobee.fl.us

From: Hatim, Abdul <Abdul.Hatim@dot.state.fl.us>

Sent: Friday, October 6, 2023 11:19 AM

To: Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>; John Hurst <jhurst@co.okeechobee.fl.us>

Cc: Roberts, David <david.roberts@dot.state.fl.us>; Keith, Andy <Andy.Keith@dot.state.fl.us>; Smith, Kristi <Kristi.Smith@dot.state.fl.us>; Scott Brady <sbrady@eg-solutionsinc.com>

Subject: RE: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

Good Morning Dawn/John,

Some additional information is needed to offer some alternatives to meet both the cleanup targets for phosphorus and maintain the maximum aircraft safety practicable. Is the project design and construction strictly DEP or is SFWMD also participating? Depending on the design specifics and the amount of encroachment into the approach and departure areas, information in the latest (March 2023) update of the Statewide Airport Stormwater Best Management Practices Manual may provide equally or more effective phosphorus removal in systems less attractive to wildlife. It may also offer some options for a smaller footprint that could take the portion of the project inside the recommended exclusion limits out of those limits. If we can get the information on exactly who is doing the project (DEP, SFWMD, or other) and project plans, we can provide more specific assistance.

Sincerely,

Abdul Hatim, Ph.D.

Airport Engineering Manager

FDOT Aviation Office

605 Suwannee Street, MS 46

Tallahassee, FL 32399-0450

Phone: (850) 414-4504

Fax: (850) 414-4508

Email: abdul.hatim@dot.state.fl.us



From: Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>
Sent: Thursday, October 5, 2023 1:48 PM
To: Hatim, Abdul <Abdul.Hatim@dot.state.fl.us>
Cc: Roberts, David <david.roberts@dot.state.fl.us>; Keith, Andy <Andy.Keith@dot.state.fl.us>;
Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>; Smith, Kristi <Kristi.Smith@dot.state.fl.us>
Subject: FW: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

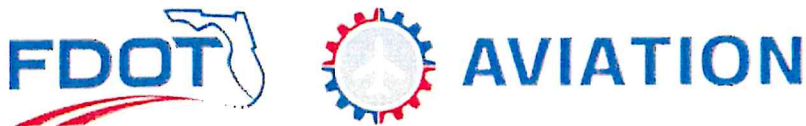
Good afternoon, Abdul:

Can you please help John Hurst, Airport Director for Okeechobee County Airport communicate FAA's concern to FDEP?

I appreciate it .

Thank you.

Dawn M. Gallon, CPM, FCCM
Aviation/Intermodal Project Manager
Modal Development Office
Florida Department of Transportation - District One
Office: 863-519-2675
Cell: 863-608-3350
dawn.gallon@dot.state.fl.us



From: John Hurst <jhurst@co.okeechobee.fl.us>
Sent: Wednesday, October 4, 2023 9:25 PM
To: Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>
Cc: Smith, Kristi <Kristi.Smith@dot.state.fl.us>; Deborah Manzo <dmanzo@co.okeechobee.fl.us>;
Richard Reade <rreade@co.okeechobee.fl.us>; Roberts, David <david.roberts@dot.state.fl.us>
Subject: Re: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

Dawn,

Thank you for the referral. Please see the attached letter from Peter Green.

The proposed project is partially located within 5 miles of the OBE aircraft operations area; however, FAA recommends that the proposed water treatment facility be located outside the 5-mile separation distance from OBE.

We understand that FDEP will be funding this project through SWFMD.

To help us comply with FAA Advisory Circular 150/5200-33C as required by our FAA grant obligations, can FDOT help us communicate FAA's concern to FDEP?

Best Regards,

John L. Hurst
Airport & Industrial Park Director
Okeechobee County Airport & Commerce Park • 2800 NW 20th Trail • Okeechobee, FL
34972
Office: 863-467-5505 • Cell: 863-634-1474
Email: jhurst@co.okeechobee.fl.us

From: Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>
Sent: Monday, August 28, 2023 2:57:51 PM
To: John Hurst
Cc: Smith, Kristi; Deborah Manzo; Gallon, Dawn
Subject: FW: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

Good afternoon, John:

Please reference the email below from Abdul Hatim on contacting the Environmental Specialist at FAA Orlando ADO, which is Peter Green, 407-487-7296 or peter.green@faa.gov.

Thank you.

Dawn M. Gallon, CPM, FCCM

Aviation/Intermodal Project Manager

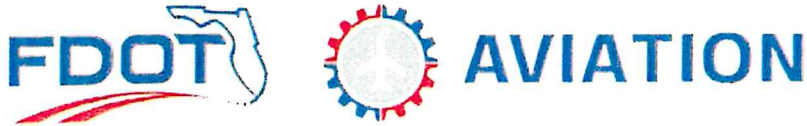
Modal Development Office

Florida Department of Transportation - District One

Office: 863-519-2675

Cell: 863-608-3350

dawn.gallon@dot.state.fl.us



From: Hatim, Abdul <Abdul.Hatim@dot.state.fl.us>

Sent: Monday, August 28, 2023 10:03 AM

To: Keith, Andy <Andy.Keith@dot.state.fl.us>; Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>; Smith, Kristi <Kristi.Smith@dot.state.fl.us>; Smith, David P <DavidP.Smith@dot.state.fl.us>

Cc: Roberts, David <david.roberts@dot.state.fl.us>

Subject: RE: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

Good Morning Dawn,

Please advise OBE to contact Environmental Specialist at FAA Orlando ADO regarding the proposed water retention pond by SFWMD.

Sincerely,

Abdul Hatim, Ph.D.

Airport Engineering Manager

FDOT Aviation Office

605 Suwannee Street, MS 46

Tallahassee, FL 32399-0450

Phone: (850) 414-4504

Fax: (850) 414-4508

Email: abdul.hatim@dot.state.fl.us



From: Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>

Sent: Thursday, August 24, 2023 8:02 AM

To: Roberts, David <david.roberts@dot.state.fl.us>; Keith, Andy <Andy.Keith@dot.state.fl.us>

Cc: Smith, Kristi <Kristi.Smith@dot.state.fl.us>; Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>

Subject: FW: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

Good morning,

Seeking your assistance on the email below from John Hurst, Okeechobee County Airport Director.

I appreciate you both.

Thank you.

Dawn M. Gallon, CPM, FCCM

Aviation/Intermodal Project Manager

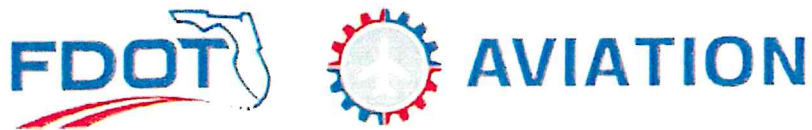
Modal Development Office

Florida Department of Transportation - District One

Office: 863-519-2675

Cell: 863-608-3350

dawn.gallon@dot.state.fl.us



From: John Hurst <jhurst@co.okeechobee.fl.us>

Sent: Tuesday, August 22, 2023 3:29 PM

To: Gallon, Dawn <Dawn.Gallon@dot.state.fl.us>

Cc: Smith, Kristi <Kristi.Smith@dot.state.fl.us>; Deborah Manzo <dmanzo@co.okeechobee.fl.us>

Subject: Looking for help preventing a potentially hazardous wildlife attractant near Okeechobee County Airport

EXTERNAL SENDER: Use caution with links and attachments.

Dawn,

We are concerned about a potentially hazardous wildlife attractant that the South Florida Water Management District is interested in building within 5 statute miles of Okeechobee County Airport's Aircraft Operations area. They are planning to build water retention that they state will attract birds which may be a hazard.

Also, CORDI, the final approach fix for the RNAV approach to runway 5 will be well within

the boundaries of the proposed site. Aircraft will be descending through 1,500' over this fix during their approach. Please see the attached drawing.

Specifically, compliance with **FAA Advisory Circular 150/5200-33C Subject: Hazardous Wildlife Attractants on or near Airports** is required per this checklist.

AC No: 150/5200-33C States:

1.4 Protection of Approach, Departure, and Circling Airspace.

For all airports, the FAA recommends a distance of 5 miles between the closest point of the airport's *aircraft operations area* and the hazardous wildlife attractant. Special attention should be given to hazardous wildlife attractants that could cause hazardous wildlife movement into or across the approach or departure airspace. Figure 1 depicts an example of the 5-mile separation distance measured from the nearest aircraft operations area.

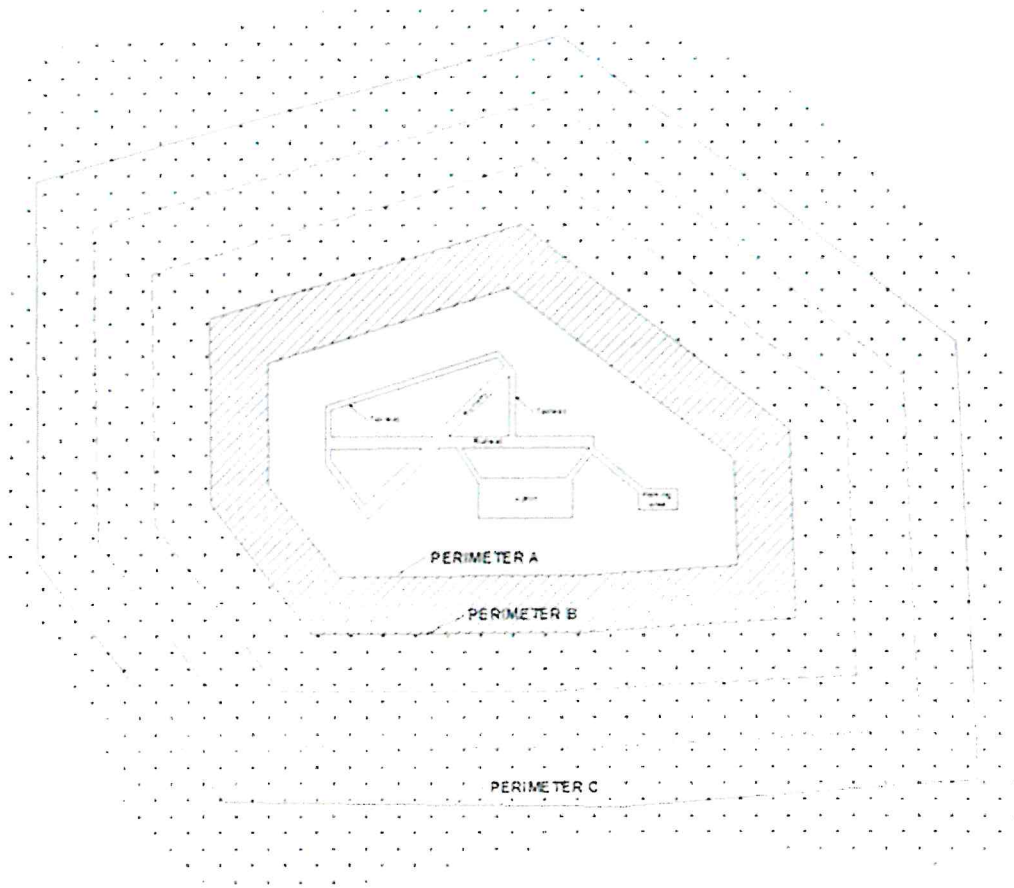
APPENDIX A. DEFINITIONS OF TERMS USED IN THIS ADVISORY CIRCULAR

A.1 General.

This appendix provides definitions of terms used throughout this AC.

1. **Air operations area.** Any area of an airport used or intended to be used for landing, takeoff, or surface maneuvering of aircraft. An air operations area includes such paved areas or unpaved areas that are used or intended to be used for the unobstructed movement of aircraft in addition to its associated runway, taxiways, or apron.

Figure 1. Example of recommended separation distances described in Chapter 1 within which hazardous wildlife attractants should be avoided, eliminated, or mitigated.



We are concerned with “Perimeter C” at Okeechobee County Airport

PERIMETER C: Recommended for all airports, 5-mile range to protect approach, departure and circling airspace.

4.3.4 Airports that have Received Federal Assistance.

Airports that have received Federal assistance are required under their grant assurances to take appropriate actions to restrict the use of land next to or near the airport to uses that are compatible with normal airport operations. See Grant Assurance 21. *The FAA recommends that airport operators oppose off-airport land-use changes or practices, to the extent practicable, within the separations identified in Paragraphs 1.2 through 1.4, which may attract hazardous wildlife. Failure to do so may lead to noncompliance with applicable grant assurances.* The FAA will not approve the placement of airport development projects pertaining to aircraft movement in the vicinity of hazardous wildlife attractants without appropriate mitigating measures. Increasing the intensity of wildlife control efforts is not a substitute for preventing, eliminating or reducing a proposed wildlife hazard. Airport operators should identify hazardous wildlife attractants and any associated wildlife hazards during any

planning process for airport development projects.

Per our obligations, the county is using all its means to prevent this. Is there anything that FDOT can also do to help? If not, who should we talk to?

Please let me know if you have any questions, or if you would like to meet and discuss.

Best Regards,

John L. Hurst

Airport & Industrial Park Director

Okeechobee County Airport & Industrial Park • 2800 NW 20th Trail • Okeechobee, FL
34972

Office: 863-467-5505 • Cell: 863-634-1474

Email: jhurst@co.okeechobee.fl.us



421 Aviation Way
Frederick, MD 21701
T. 202-737-7950
F. 202-273-7951
www.aopa.org

December 1, 2023

Florida Department of Environmental Protection
Mr. Shawn Hamilton, Secretary
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000

South Florida Water Management District
Mr. Chauncey Goss, Board Chairman
3301 Gun Club Road
West Palm Beach, FL 33406

Via Email to shawn.hamilton@floridadep.gov and cgoss@sfwmd.gov

Re: AOPA Opposition to the Location of the Proposed LKBSTA.

Honorable Secretary Hamilton and Chairman Goss,

The Aircraft Owners and Pilots Association (AOPA) is the largest aviation association in the world with over 60,000 members in the southeast US alone. On behalf of the pilots and aircraft owners that reside in and around Okeechobee County, and aviators that visit the three airports in Okeechobee County, AOPA opposes the location of the Lower Kissimmee Basin Stormwater Treatment Area (LKBSTA) Project.

Any project that has the *potential* to increase the risk of wildlife interaction with aircraft threatens aviation safety. This public threat is greatest when wildlife crosses paths with an aircraft on approach or departure from an airport, the most demanding operations of flying. It is unlikely that the proposed project can be engineered, and maintained, as to not *potentially* increase the risk of wildlife mixing with aircraft operations and therefore should not move forward in its proposed location.

The annual cost of wildlife strikes to the US civil aviation industry in 2022 was projected to be 67,848 hours of aircraft downtime and \$385 million in direct and other monetary losses.¹ Furthermore, these strikes put the lives of aircraft crew members and their passengers at risk: over 250 people have been killed worldwide as a result of wildlife strikes since 1988.²

Three airports, Okeechobee County Airport (OBE), River Oak (00FL), and Sunset Strip Airpark (32FA), are in the vicinity of the proposed project. These airports have a combined based aircraft make-up of 65 single and multi-engine aircraft, 2 jets, and 3 helicopters. Estimated annual operations include over 5600 local operations plus over 45,000 itinerant (visiting) operations.³ Additionally, in reviewing the airports' positive financial impact to the community, the OBE Economic Impact Study alone shows economic impacts of 894 employees with a total payroll of \$43.1 million and a **total output of \$153 million** (see

¹ <https://birdstrike.org/wildlife-management-resources/#hot-topics> accessed 11/29/2023.

² <https://www.fws.gov/story/threats-birds-collisions-aircraft> accessed 11/29/2023.

³ FAA 5010 Database accessed 11/29/2023.

the attached summary). It would be a detriment to the financial viability of the overall community to construct such a wildlife attractant as it may cause pilots and businesses to go elsewhere.

The proposed project location does not meet the Federal compliance standards per FAA Advisory Circular governing Hazardous Wildlife Attractants (AC 150/5200-33C) for which OBE must comply as a Federally obligated airport. While the consultant project manager correctly stated during the August 29th townhall meeting that they do not *need permission* from the FAA to construct the project, the pressure is borne by the airport sponsor to protect the flying public and the public investment in OBE. We applaud the August 23, 2023, letter to the FDEP from the Board of County Commissioners of Okeechobee County informing the various agencies about the valid and real concerns. Regardless that previous projects were inappropriately allowed to occur too close to an airport, no additional hazardous projects should move forward that are inconsistent with the FAA's standards for the safety of civil aviation.

While two airports (00FL and 32FA) are not federally obligated, it is ill advised from a public policy perspective to ignore the public safety hazard that will be created with this project in the proposed location. The project property line is only ~1500' away from River Oak and Sunset Strip Airpark runways placing the potential increased wildlife risk immediately in the departure and landing paths.

Although collisions between birds and airplanes can occur at any time, the majority occur at relatively low altitudes during take-off and landing. Due to the proposed project location, there will be low-flying aircraft traversing the area routinely. A wildlife strike at these altitudes will likely prohibit a safe return to the airport and may impede quick emergency response to any aircraft that may crash into the wetland/stormwater project due to bird strike damage. A quick google search for "Aircraft bird strike videos" will yield plenty of alarming news stories of aircraft suffering bird strikes. If this project moves forward in its present location, and an accident occurs, the likelihood of a story highlighting the voiced opposition will be a difficult to avoid.

The AOPA opposes this project's location due to the threat to civil aviation. We urge you to relocate the project away from any active airport operations area. Should you have any questions, please contact me via email at stacey.heaton@aopa.org.

Sincerely,



Stacey Heaton, AAE
Southern Regional Manager

Attach: OBE AEIS

Cc: Mr. Adam Blalock, Deputy Secretary for Ecosystems Restoration, FDEP
via email: adam.blalock@floridadep.gov

Mr. Drew Bartlett, Executive Director, SFWMD
via email: dbartlett@sfwmd.gov

Mr. John Hurst, Airport & Industrial Park Director, Okeechobee County
via email: jhurst@okeechobeecountyfl.gov

AIRPORT ECONOMIC IMPACTS



894
JOBS



\$43.1M
PAYROLL



\$73.3M
VALUE ADDED

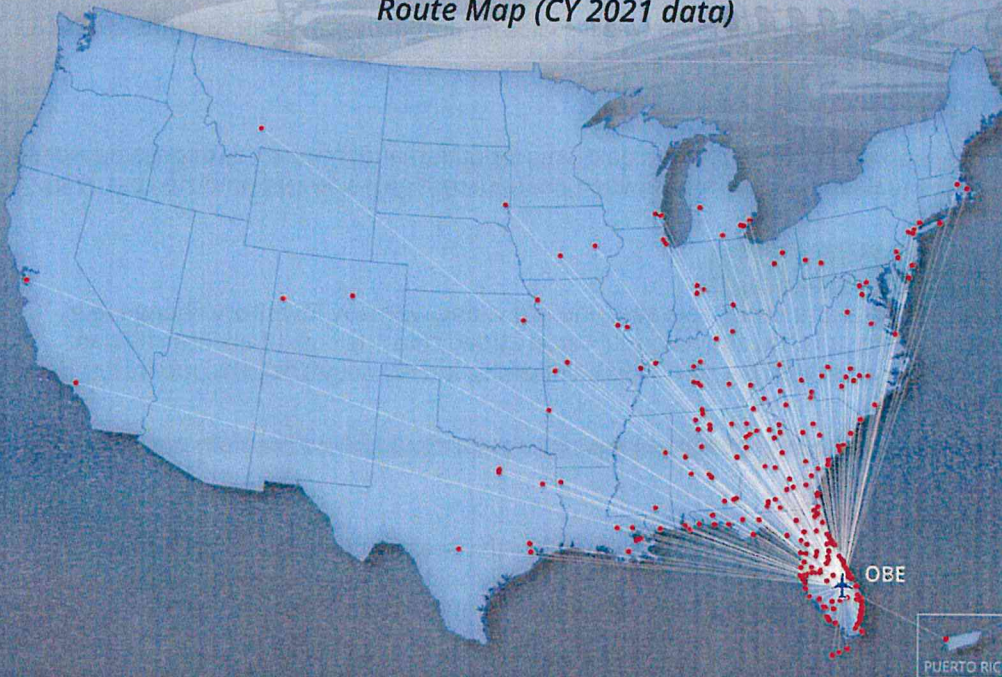


\$153M
ECONOMIC
IMPACT
(OUTPUT)

About Okeechobee County Airport

Okeechobee County Airport (OBE) is a general aviation (GA) airport located directly northwest of the city of Okeechobee. The airport provides two intersecting paved runways, the longest of which (Runway 05/23) is 5,000 feet long by 100 feet wide. The airport serves as a hub for recreational GA flying, as well as business/corporate flights and charter air service. Business and corporate travelers utilize OBE to quickly access Okeechobee and the surrounding south-central Florida region. The airport boasts multiple aviation-related tenants, and an adjacent industrial park supports local jobs and bolsters the airport's economic impact. Flying clubs from around Florida fly into OBE to utilize airport fueling facilities and visit the on-site restaurant, which has become a favorite for locals and visitors alike. The airport has undertaken multiple capital improvements over the past few years. In early 2022, OBE installed an Automated Weather Observation Station (AWOS) and completed a major runway rehabilitation project. These improvements, along with the airport's numerous amenities, continue to draw visitors from around Florida and the United States.

Okeechobee County Airport
Route Map (CY 2021 data)



STATEWIDE ECONOMIC IMPACTS¹



2,009,088
JOBS



\$109B
PAYROLL



\$170B
VALUE ADDED



\$336B
ECONOMIC
IMPACT
(OUTPUT)

¹Totals include new off-airport air cargo impacts developed for this update

STUDY OVERVIEW

Florida's over 125 public-use airports are economic engines for the state, representing some of the largest aviation facilities in the world and providing critical transportation connections for their local communities. By supporting jobs both on- and off- airport property, Florida's airports support the infrastructure necessary for important activities such as manufacturing, logistics, tourism, and emergency response.

In 2021, Florida welcomed over 43 million out-of-state visitors through its commercial service airports and over 4.6 million visitors through its general aviation airports. Over 3,500 businesses operate at Florida's airports and their 161,000 direct employees create substantial economic impacts.

To help quantify and communicate these immense contributions, the FDOT Aviation Office initiated the development of the 2022 Florida Aviation Economic Impact Study. This study calculates each airport's annual monetary contribution to their local, regional, and statewide economies. This study determined that Florida's aviation system generated 2,009,088 jobs and contributed \$336 billion in 2021 to the state's economy, accounting for 13.5% of Florida's gross domestic product (GDP).²

²Totals include new off-airport air cargo impacts developed for this update



What is Economic Impact?

The economic impacts of each airport and the state are defined by the total jobs, payroll, value added, and economic impact (output) generated by aviation in the state. These are defined as:



JOBS

The sum of full-time and part-time employees, and account for the total number of people employed as a result of the airport or company within a defined geography or industry.



PAYROLL

Total compensation for work, including gross wages, salaries, employer-provided benefits and taxes paid to governments on behalf of employees.



VALUE ADDED

Consists of compensation of employees, taxes paid on production and imports, and gross operating surplus. Value added equals the difference between an industry's gross output and the cost of its intermediate inputs.



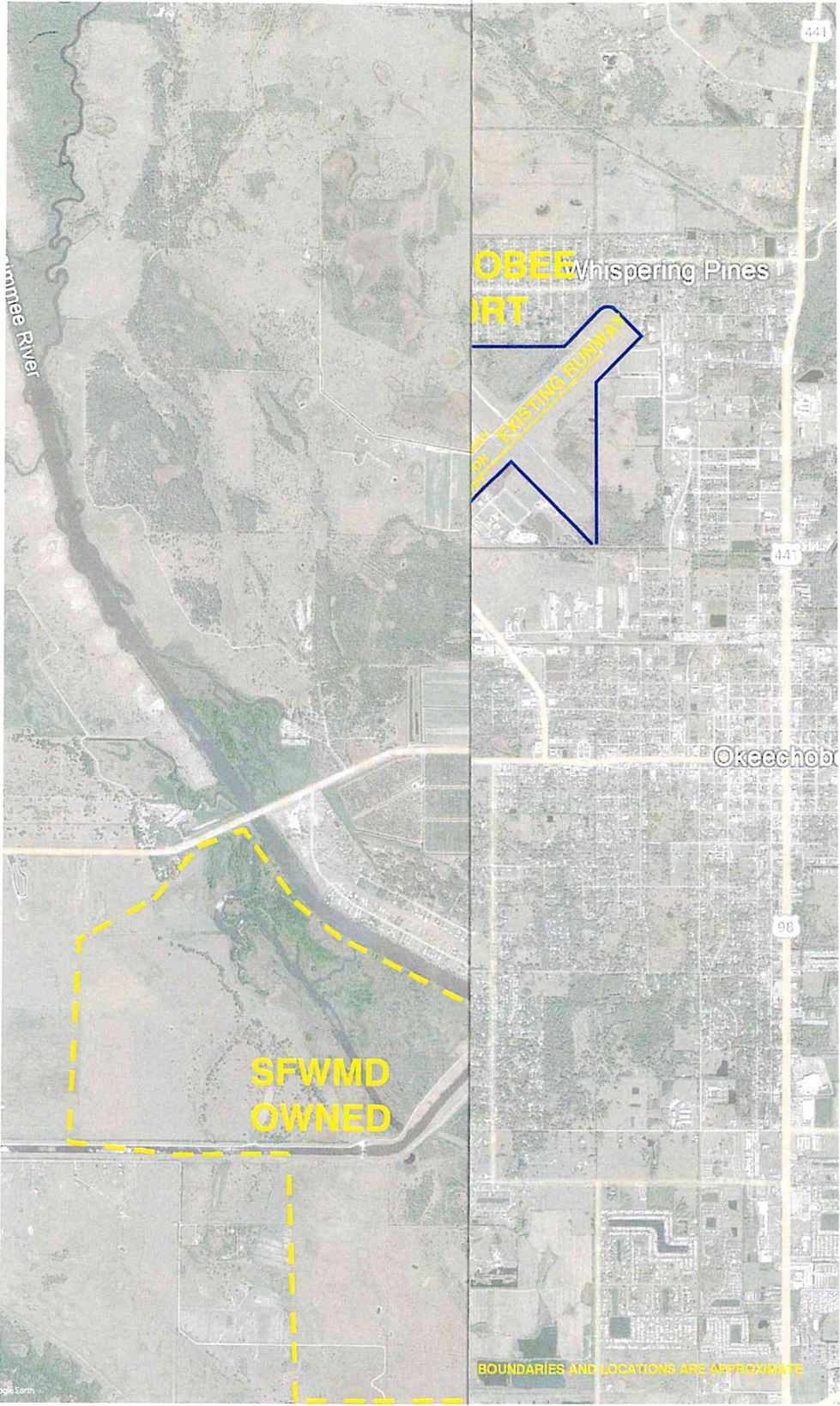
ECONOMIC IMPACT (OUTPUT)

The value of sales or receipts and other operating income along with any inventory change (e.g., spoilage, breakage, or theft). It is the equivalent of value added plus the cost of all intermediate inputs (including energy, raw materials, semi-finished goods, and services) that are purchased from all sources/locations.



OFF-AIRPORT AIR CARGO

Off-airport air cargo is a new component of this study which assesses the cargo activity that interacts with Florida's businesses and relies on Florida's airports. The off-airport air cargo component was developed to highlight Florida's diverse industries that depend on airports to support business activity.



BOUNDARIES AND LOCATIONS ARE APPROXIMATE



REV	DATE	DESCRIPTION	APPR
1			
2			
7			
8			

OKEECHOBEE COUNTY AIRPORT
 OKEECHOBEE, FLORIDA
 TITLE BOUNDARY EXHIBIT

DRAWING
 SHEET
 1
 OF 1 SHEETS