

## APPENDIX B

### AGENCY CORRESPONDENCE ON FEIS

This appendix contains copies of correspondence between the FAA and other Federal, state, and local agencies documenting coordination efforts and agency comments on the FEIS. The correspondence in this appendix is listed by originating agency and arranged by date.

<b>Originating Agency</b>	<b>Name</b>	<b>Date</b>
Town of Cloud Lake	Dorothy Gravelin	January 24, 2011
U.S. Fish and Wildlife Service	John M. Wrublik	February 9, 2011
State Historic Preservation Officer	Laura A. Kammerer	February 22, 2011
Seminole Tribe of Florida	Willard Steele	February 28, 2011
U. S. Environmental Protection Agency	Heinz J. Mueller	March 7, 2011
State Clearinghouse	Lauren P. Milligan	March 21, 2011
City of West Palm Beach	Alex Hansen	March 21, 2011
Town of Palm Beach	Thomas G. Bradford	March 21, 2011



**Town Of Cloud Lake C/O Dorothy  
Gravelin <townofcloudlake@msn.com>**

01/24/2011 09:12 AM

To <pbia-eis@urscorp.com>

cc

bcc

Subject PBIA Final EIS

I saw the NOTICE OF AVAILABILITY OF FINAL EIS for the proposed airfield improvements at PBIA in yesterday's edition of The Palm Beach Post. As an affected party adjacent to PBIA the Town of Cloud Lake requests a hard copy and CD-ROM of the FEIS. This information will be retained at the Cloud Lake Town Hall reference library for review by the Council and residents.

Please contact me if you need any additional information.

Dorothy Gravelin, Town Clerk  
Town of Cloud Lake  
561-686-2815 Phone  
561-683-5120 Fax

**From:** [Peter Green](#)  
**To:** [Russell Forrest](#)  
**Subject:** Fw: FEIS for Proposed Airfield Improvement Project Palm Beach International Airport  
**Date:** 02/10/2011 11:48 AM

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----- Forwarded by Peter Green/Tampa/URSCorp on 02/10/2011 11:47 AM -----

**Bart.Vernace@faa.gov**

02/10/2011 10:29 AM

To: Peter.Green@URSCorp.com  
cc:  
Subject: Fw: FEIS for Proposed Airfield Improvement Project Palm Beach International Airport

FYI

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|----->
| From: |
|----->
|-----|
|John_Wrublik@fws.gov
|
|-----|
|----->
| To: |
|----->
|-----|
|Bart
|Vernace/ASO/FAA@FAA
|-----|
|----->
| Date: |
|----->
|-----|
|02/09/2011 01:39
|PM
|-----|
|----->
| Subject: |
|----->
|-----|
|FEIS for Proposed Airfield Improvement Project Palm Beach International
|Airport
|-----|
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Dear Mr. Vernace,

The U.S. Fish and Wildlife Service (Service) has reviewed the Final Environmental Impact Statement (FEIS) for the proposed Airfield Improvement Project at the Palm Beach International Airport in Palm Beach County, Florida. The Service has no further comments on the FEIS at this time.

Sincerely,

John M. Wrublik  
U.S. Fish and Wildlife Service  
Vero Beach Ecological Services Office  
1339 20th Street  
Vero Beach, Florida 32960  
Phone: 772-562-3909, x-282  
Fax: 772-562-4288



RECEIVED FEB 25 2011

FLORIDA DEPARTMENT OF STATE  
**Kurt S. Browning**  
Secretary of State  
DIVISION OF HISTORICAL RESOURCES

Mr. Bart Verance  
Federal Aviation Administration  
Orlando Airports District Office  
5950 Hazeltine National Drive, Suite 400  
Orlando, Florida 32822-5024

February 22, 2011

RE: DHR Project File Number: 2011-542  
Federal Aviation Administration  
*Final Environmental Impact Statement for the Proposed Airfield Improvement Project at Palm Beach International Airport*  
West Palm Beach, Palm Beach County

Dear Mr. Verance:

This office reviewed the referenced project for possible impact to historic properties listed, or eligible for listing, in the *National Register of Historic Places*. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, *36 CFR Part 800: Protection of Historic Properties* and the *National Environmental Policy Act of 1969*, as amended.

We have reviewed the sections of the *Final Environmental Impact Statement* dealing with historic, archaeological, and historic architectural resources and it is the opinion of this office that these resources have been adequately addressed.

If you have any questions concerning our comments, please contact Scott Edwards, Historic Preservationist, by electronic mail [sedwards@dos.state.fl.us](mailto:sedwards@dos.state.fl.us), or at 850.245.6333.

Sincerely,

A handwritten signature in cursive script that reads "Laura A. Kammerer".

Laura A. Kammerer  
Deputy State Historic Preservation Officer  
For Review and Compliance

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

Director's Office  
(850) 245.6300 • FAX: 245.6436

Archaeological Research  
(850) 245.6444 • FAX: 245.6452

Historic Preservation  
(850) 245.6333 • FAX: 245.6437

SEMINOLE TRIBE OF FLORIDA  
TRIBAL HISTORIC PRESERVATION OFFICE

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TRIBAL HISTORIC  
PRESERVATION OFFICE  
  
SEMINOLE TRIBE OF FLORIDA  
AH-TAH-THI-KI MUSEUM  
  
34725 WEST BOUNDARY ROAD  
CLEWISTON, FL 33440  
  
PHONE: (863) 983-6549  
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TRIBAL OFFICERS  
  
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**MITCHELL CYPRESS**  
  
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**RICHARD BOWERS JR.**  
  
SECRETARY  
**PRISCILLA D. SAYEN**  
  
TREASURER  
**MICHAEL D. TIGER**

Bart Vernace, PE  
U.S. Department of Transportation  
Federal Aviation Administration  
5950 Hazelton National Drive, Suite 400  
Orlando, Florida 32822

**THPO#:007648**

February 28, 2011

**Subject:** FEIS for the Proposed Airfield Improvement Project at the Palm Beach International Airport, Palm Beach County, Florida

Dear Mr. Vernace,

The Seminole Tribe of Florida's Tribal Historic Preservation Office (STOF-THPO) has received the Federal Aviation Administration's correspondence concerning the aforementioned project. The STOF-THPO has no objection to your findings at this time. However, the STOF-THPO would like to be informed if cultural resources that are potentially ancestral or historically relevant to the Seminole Tribe of Florida are inadvertently discovered during the construction process. We thank you for the opportunity to review the information that has been sent to date regarding this project. Please reference **THPO-007648** for any related issues.

We look forward to working with you in the future.

Sincerely,

**Direct routine inquiries to:**

Willard Steele  
Tribal Historic Preservation Officer  
Seminole Tribe of Florida

Anne Mullins  
Compliance Review Supervisor  
annemullins@semtribe.com

JP:am:ws



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
SAM NUNN  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA GEORGIA 30303-8960

RECEIVED MAR 10 2011

March 7, 2011

Mr. Bart Vernace  
U.S. Department of Transportation  
Federal Aviation Administration  
5950 Hazelton National Drive, Suite 400  
Orlando, FL 32822

SUBJECT: Palm Beach International Airport Project, Construction and Operation of  
Proposed Airfield Improvements, Funding, Palm Beach County, FL  
CEQ Number 20110027

Dear Mr. Vernace:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced FAA Final Environmental Impact Statement (FEIS) for the proposed Airfield Improvement Project (AIP) at Palm Beach International Airport (PBIA) in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

### **Project Description**

FAA currently designates PBIA as a "medium-hub primary commercial service airport." A total approaching seven million passengers using 18 different commercial passenger air carriers were accommodated by PBIA in 2006 (project baseline). The current airport runway layout consists of an east-west primary runway (9L/27R) with 10,000-ft x 150-ft dimensions that serves commercial aircraft; a closely-spaced "southern" parallel east-west runway (9R/27L) with 3,210-ft x 75-ft dimensions that serves General Aviation (GA) aircraft; and a north-south crosswind runway (13/31) with 6,932-ft x 150-ft dimensions intersecting the primary runway that serves GA aircraft and commercial aircraft as needed. In essence, however, PBIA operates as a one-runway airport for commercial flights, since the southern runway cannot accommodate commercial airliners, the crosswind intersects with the primary runway, and the parallel runways are only separated by 700 feet. Accordingly, PBIA has two dependent air carrier runways and one dependent GA runway.

Numerous alternatives were screened in the DEIS using a Level 1 (Purpose and Need), Level 2 (Airfield Design Criteria) and Level 3 (Environmental Considerations) evaluation approach. Most offsite alternative modes of transportation, offsite reliever or new airports, and numerous onsite runway configurations were screened out in the process.

The Sponsor's Proposed Project would extend the length of the southern GA runway (9R/27L) by +4,790 feet (from 3,210 ft to 8,000 ft) and widen it by +75 feet (from 75 ft to 150 ft). This modification would provide PBIA with a second commercial runway parallel to the primary runway to help accommodate additional operations and annual/hourly peak demands for design years 2013 and 2018. In addition, the southern runway would be relocated to the south by 100 feet to attain the minimum FAA centerline separation distance of 800 feet for the operation of commercial aircraft on parallel runways for ARC D-IV airports. After the project, the primary runway would principally serve airport departures while the extended southern parallel runway would principally serve arrivals.

Additional AIP modifications would mainly involve taxiways, the crosswind runway and the Runway Safety Areas (RSA). In addition to also extending associated taxiways to accommodate the proposed new airport configuration, the crosswind runway would be reconfigured, resulting in an overall shorter (4,000 ft) but wider (150 ft) crosswind runway that is decoupled from the primary runway. Moreover, the size of the RSAs at the ends of the southern and the crosswind runways would be made compliant with FAA regulations and airport lighting, navigational aids and other modifications would also be provided. The AIP would also require relocation of a portion (750 ft) of the Airport West Canal, acquisition of 8.5 acres of land, and relocation of some existing airport facilities.

Alternative 2 is similar to the Sponsor's Proposed Project except that it would eliminate the crosswind runway (instead of reconfiguring it) and add another 10,000-ft parallel runway 800 feet north of the primary runway instead of extending the existing southern runway to 8,000 feet. The southern runway would be retained unchanged as a GA runway. From north to south, the three runways for Alternative 2 would become 9L/27R, 9C/27C and 9R/27L.

**Remaining comments:**

EPA appreciates FAA addressing many of the DEIS comments, however, we continue to have concerns: the increases in noise exposures to residents and the air quality emissions of additional forecasted operations. Direct, indirect and cumulative impacts water quality and environmental justice.

Noise – Aircraft noise exposures were well documented in the FEIS. Exposure levels are predicted for numerous residents living within the 65+ DNL noise contours for 2013 and 2018, including exposure to significant +1.5 DNL and greater increases. No exposure to significant increases (+3.0 DNL or greater) was predicted to residents living within the 60 DNL.

EPA appreciates that noise mitigation was considered in the FEIS and that a number of homes and other sensitive noise receptors within the 65 DNL have already been sound-proofed by the Sponsor through previous efforts. However, if the project is pursued, the mitigation for noise exposures of residents should be substantively further addressed in the FAA Record of Decision (ROD).

We believe that all residents already living within the 65+ DNL noise contours that are

significantly elevated (+1.5 DNL or more) by the proposed project, should be provided with mitigation. We further feel that residents currently living outside the 65 DNL but that would be newly brought into the 65 DNL through a significant noise elevation (+1.5 DNL or more) due to the project should also receive mitigation. To ensure such mitigation, we recommend that the approval of the Airport Layout Plan (ALP) in the ROD be conditioned on appropriate mitigation for those housing units that would experience a +1.5 DNL or greater increase due to the Proposed Project.

A finalized noise mitigation plan should then be documented in the FAA ROD, include FAA and Sponsor commitments, and be made available to all interested parties. Ultimately, the Sponsor (in consultation with FAA) would implement the final mitigation plan before the project is implemented (proposed 2013 start-up), and monitor the implemented measures where appropriate (sound-proofing) to ensure successful noise attenuation.

In regard to types of mitigation measures, EPA prefers that eligible residences be acquired by the Sponsor from willing sellers through direct acquisition or purchase assistance. This would particularly apply for homes located in the higher contours of the 65+ DNL contours. Secondly, we prefer that homes be sound-proofed by the Sponsor. The level of insulation might need to be greater for any residences located in higher contours that were not acquired. In contrast, the use of easements would not mitigate noise exposures or change the land use to be compatible with airports. Overall, the implementation of noise mitigation should be prioritized starting with residences experiencing higher levels and continue toward the 65 DNL.

Air Quality – EPA offers the following summaries for onsite and offsite criteria pollutant National Ambient Air Quality Standards (NAAQS) and Greenhouse Gas (GHG) emissions attributable to the project.

The Proposed Project's and Alternative 2's predicted reduction of average aircraft delay times can be expected to reduce air emissions at PBI compared to the No Action Alternative. Air emissions at PBI can be expected to increase during the design period (2013-2018) largely due to the forecasted increase in aircraft operations. The FEIS indicates that these increases are not expected to exceed the NAAQS. However, due to recent changes in the expected implementation timeline for the revised ozone NAAQS occurring before or within the project design period (2013-2018), the ROD should address how increased airport emissions will not adversely impact air quality such that the area will not violate the revised zone NAAQS. Moreover, beyond the design period, we believe that air emissions can be expected to further increase with continued growth in operations that presumably could otherwise not be accommodated without the proposed runway modification. We request that modeling of potential future air emission impacts be addressed in the ROD.

In addition to project reduction of aircraft delay times, EPA recommends overall airport reductions in GHG to further the "greening" of the airport through various measures such as alternative fuels, ground support equipment, auxiliary power units, electrification, idling practices, diesel retrofits, cell phone waiting areas, energy conservation, etc. EPA can assist in the future development of these options.

Water Quality - Airport operations include many activities likely to result in the discharge of pollutants to adjacent water bodies. Those activities include aircraft and airfield fuel storage and refueling, aircraft and vehicle cleaning and maintenance, and construction. These activities are regulated under provisions of the Clean Water Act (CWA).

The CWA prohibits any “point source” (a discrete conveyance such as a drainage ditch, pipe, or other outfall) from discharging pollutants into waters of the United States. The primary mechanism for controlling pollutant discharges is through the administration of the National Pollutant Discharge Elimination System (NPDES) permit program. The NPDES permit program regulates discharges of stormwater and wastewater. Due to the nature of their outdoor operations and because airports are included in one of the industrial categories regulated under the NPDES stormwater permitting program (under the Standard Industrial Classification code “Transportation by Air”), all airports are required to have a stormwater permit. Airports that discharge other wastewater, such as from equipment maintenance and cleaning operations, require an additional NPDES wastewater permit. Discharges associated with stormwater often pose the greatest challenge to airport managers, because airports may be spread out over a wide surface area, with a majority of operations exposed to the elements.

Factors that may affect permit requirements (i.e., appropriate BMPs), include:

- the local climate (dry versus rainy/wet, cold versus warm);
- the type or size of adjacent water bodies — pollutants are diluted depending on the size of the water body receiving the discharge (e.g., a creek or stream versus a river or ocean);
- the water quality of adjacent water bodies — local permitting authorities consider existing pollutant levels when controlling airport discharges; and
- airport size.

EPA recommends the implementation of best management practices (BMPs) that prevent or minimize the discharge of pollutants into a water body (e.g., construction of a stormwater retention pond to prevent stormwater drainage directly into receiving waters).

### Socioeconomic Impacts, EJ and Children’s Health

The hardcopy of the FEIS Document that included the Appendices did not include Appendix K (the agency correspondence and response to comments). In the future, the responsiveness summary should be provided to the agency for review in hardcopy format. Additional copies of the document and appendices (i.e. responsiveness summary) may be submitted on CDs or other formats based on the reviewers preferences.

In the DEIS, EPA expressed concerns about a multi-family HUD housing complex that would experience a significant increase in noise as a result of Alternative 2. According to DEIS, there was no buyout or acquisitions proposed. However, EPA noted that other mitigation measures such as soundproofing were mentioned, but were not committed to in the DEIS. EPA appreciates FAA’s FEIS commitment to develop appropriate noise mitigation for the housing

complex should FAA select Alternative 2 as the Preferred Alternative. We recommend that the Record of Decision (ROD) clearly indicate the specific type of noise mitigation that will be used should Alternative 2 be selected. We request a copy of the ROD for our review and files.

EPA noted that the Executive Summary does not provide the percentages of potential EJ populations that would experience significant noise increases resulting from the project. The FEIS response indicated that neither the AIP nor Alternative 2 would result in disproportionately high and adverse environmental effect on minority or low income populations. See Section 5.14 of the FEIS for further information. EPA believes that it is important to disclose the percentages of EJ populations that would experience significant noise increases to ensure that the projects potential effects are transparent and are clearly communicated.

In the DEIS, EPA noted that in the short-term, there should be no significant adverse effect on children's health. However, we indicated that increased air pollutant emissions are expected in the long term due to additional operations and enplanements and that we recommended be re-evaluated as the airport expands or as operations and enplanements. FAA indicated that as a result of the 2009 TAF for PBI, the Airport Sponsor deemed it necessary to re-evaluate the implementation plan and schedule for the AIP at PBI. After consultation with the FAA, the Airport Sponsor determined that based on the 2009 TAF, the proposed Runway 10R/28L improvements would not need to be implemented as soon as previously thought. As a result of the revised implementation plan and schedule for the AIP, the FAA has provided an accounting of potential future environmental impacts associated with the Long-Term components of the AIP or Alternative 2 based on the best information currently available. EPA notes that the FAA acknowledges that these conditions may change over time. We support FAA's FEIS commitment to reassess these conditions with additional NEPA analysis when a decision on the Long-Term components of the AIP or Alternative 2 is ready to move forward and the number of aircraft operations at PBI returns to the levels that would cause unacceptable aircraft operational delay.

## **Summary**

EPA's primary concerns with this project are the increases in aircraft noise exposures to residents and the air quality emissions of forecasted additional enplanements and operations. Direct, indirect (induced) and cumulative impacts are of concern. We find the predicted noise exposure levels for local residents due to the project to be significant for both the evaluated Proposed Project and Alternative 2 for both design years. Regarding noise mitigation, EPA believes that the proposed FAA position for this project has merit but should be expanded.

Regarding air quality, EPA is pleased that the predicted reduction of average aircraft delay times for both considered alternatives can be expected to reduce air emissions at PBI compared to the No Action Alternative. However, largely due to forecasted increases in aircraft operations, the FEIS indicates that criteria-based air emissions at PBI can be expected to increase during the project design period (2013-2018), even though the FEIS indicates that these increases are not expected to exceed the NAAQS. Nevertheless, due to recent changes in the expected implementation timeline for the revised ozone NAAQS occurring before or within the

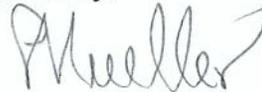
project design period, the ROD should address how increased airport emissions will not adversely impact air quality such that the area will not violate the NAAQS. We request that modeling of potential future air emission impacts be addressed in the ROD.

Regarding water quality EPA recommends the implementation of best management practices (BMPs) that prevent or minimize the discharge of pollutants into a water body (e.g., construction of a stormwater retention pond to prevent stormwater drainage directly into receiving waters).

Regarding EJ EPA recommends that the Record of Decision (ROD) clearly indicate the specific type of noise mitigation that will be used should Alternative 2 be selected. We request a copy of the ROD for our review and files.

We appreciate the opportunity to review the proposed action. Please contact Ken Clark of my staff at (404) 562-8282 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management



Allan.Nagy@faa.gov  
03/22/2011 09:26 AM

To Peter\_Green@URSCorp.com,  
Russell\_Forrest@URSCorp.com,  
Paul\_Behrens@URSCorp.com  
cc  
bcc  
Subject Fw: State of Florida Comments on FEIS for Palm Beach  
International Airport Airfield Improvement Project

Allan M. Nagy  
Environmental Program Specialist  
Federal Aviation Administration  
Orlando Airports District Office  
Office: 407-812-6331 ext. 130  
Cell: 813-679-0867

----- Forwarded by Allan Nagy/ASO/FAA on 03/22/2011 09:25 AM -----

From: Bart Vernace/ASO/FAA  
ASO-ORL-ADO, Orlando, FL  
To: Allan Nagy/ASO/FAA@FAA  
Date: 03/22/2011 07:16 AM  
Subject: Fw: State of Florida Comments on FEIS for Palm Beach International Airport Airfield Improvement Project

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#### Comments on the PBI FEIS

Bart Vernace, P.E.  
Assistant Manager  
Federal Aviation Administration  
Orlando Airports District Office  
(407) 812-6331, ext. 127

----- Forwarded by Bart Vernace/ASO/FAA on 03/22/2011 07:15 AM -----

From: "Milligan, Lauren" <Lauren.Milligan@dep.state.fl.us>  
To: Bart Vernace/ASO/FAA@FAA  
Cc: Virginia Lane/ASO/FAA@FAA, "Mann, Sally" <Sally.Mann@dep.state.fl.us>, "Stahl, Chris" <Chris.Stahl@dep.state.fl.us>  
Date: 03/21/2011 06:44 PM  
Subject: State of Florida Comments on FEIS for Palm Beach International Airport Airfield Improvement Project

---

Dear Mr. Vernace:

RE: Federal Aviation Administration – Final Environmental Impact Statement for Proposed  
Airfield Improvement Project at Palm Beach International Airport – West Palm Beach, Palm  
Beach County, Florida.

SAI # FL201101275618C (Reference Previous SAI # FL200809184438C)

Please find attached a copy of the State of Florida's clearance letter for the referenced Final EIS. If you have any questions or need further assistance, please don't hesitate to contact me at (850) 245-2170 or [Lauren.Milligan@dep.state.fl.us](mailto:Lauren.Milligan@dep.state.fl.us).

Best regards,

*Lauren P. Milligan*

Lauren P. Milligan, Environmental Manager  
Florida State Clearinghouse  
Florida Department of Environmental Protection  
3900 Commonwealth Blvd, M.S. 47  
Tallahassee, FL 32399-3000  
ph. (850) 245-2170  
fax (850) 245-2190

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#) . Thank you in advance for completing the survey.*



11-5618C (FAA Palm Beach Airport Improvements FEIS).pdf



# Florida Department of Environmental Protection

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard, Jr.  
Secretary

March 21, 2011

Mr. Bart Vernace, P.E.  
Orlando Airports District Office  
Federal Aviation Administration  
5950 Hazeltine National Drive, Suite 400  
Orlando, FL 32822-5024

RE: Federal Aviation Administration – Final Environmental Impact Statement  
for Proposed Airfield Improvement Project at Palm Beach International  
Airport – West Palm Beach, Palm Beach County, Florida  
SAI # FL201101275618C (Reference Previous SAI # FL200809184438C)

Dear Mr. Vernace:

The Florida State Clearinghouse has coordinated a review of the referenced Final Environmental Impact Statement (FEIS) under the following authorities: Presidential Executive Order 12372; Section 403.061(40), *Florida Statutes*; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended. This letter summarizes reviewing agencies' comments, copies of which are attached and should be consulted for additional detail.

Staff of the Florida Department of Environmental Protection's (DEP) Southeast District Office confirm statements contained in the FEIS indicating that petroleum and hazardous waste contamination assessments and cleanup activities will be required for several existing airport properties and proposed acquisition sites in accordance with Chapters 62-770 and 62-780, *Florida Administrative Code (F.A.C.)*. In the event additional contamination is detected during construction, the DEP should be notified and Palm Beach County may need to address the problem through additional assessment and/or remediation activities. Projects involving dewatering should be discouraged, due to the potential for spreading contamination to previously uncontaminated areas off-site and affecting contamination receptors, site workers and the public. Dewatering associated with the construction activities may also be subject to NPDES permitting under Rule 62-621.300(1)-(2), *F.A.C.*, and/or require other permits or approvals from the South Florida Water Management District's Water Use Section. The enclosed DEP memorandum provides additional recommendations from DEP's Waste Management and Air Resource Management staff.

Noting that the Palm Beach International Airport (PBIA) is located adjacent to Military Trail, Southern Boulevard and Interstate-95, the Florida Department of Transportation's (FDOT) District Four staff offers the following comments:

- The FEIS indicates that the proposed Near-Term Airfield Improvement Project will include an entrance road to the PBIA facilities from Military Trail. Because the entrance will cross state-owned right-of-way, the PBIA must coordinate with FDOT's Palm Beach Permits Manager, Mr. Brett Drouin, at (561) 432-4966 to obtain the necessary FDOT permits prior to project activities within or connecting to state road right-of-way.
- Changes in runway configuration are expected to alter existing flight paths over these state roads, the ownership of which includes the vertical space above the rights-of-way. Changes in flight paths over the roads will require coordination with FDOT District Four, possibly including the execution of easement documents, such as aviation easements (page ES-108).
- Environmental permit applications associated with proposed activities within FDOT rights-of-way will also require close coordination between the applicant, FDOT and the permitting entity. If the project will impact environmental resources located within FDOT rights-of-way, please coordinate with Ms. Ann Broadwell, Environmental Administrator for the FDOT District Four PL&EM Office, at (954) 777-4325 or [ann.broadwell@dot.state.fl.us](mailto:ann.broadwell@dot.state.fl.us).
- If FDOT right-of-way or property will be used for the installation of facilities or the storage/staging of equipment, materials or vehicles, please notify the FDOT District Four PL&EM Office with appropriate project-specific plans and details.
- Planned roadway projects in the vicinity of the project should be considered.
- Should the need arise for lane closures or traffic channeling on the state roadway system, Maintenance of Traffic Plans will be required. Please contact FDOT's Traffic Operations Office at (954) 777-4407 for additional information.
- If any hazardous materials will be transported on state roads, a hazardous spills response plan must be prepared, and coordination with the FDOT District Four Maintenance Permits Office will be required.

Based on the information contained in the FEIS and enclosed state agency comments, the state has determined that, at this stage, the proposed activities are consistent with the Florida Coastal Management Program (FCMP). To ensure the project's continued

Mr. Bart Vernace, P.E.

March 21, 2011

Page 3 of 3

consistency with the FCMP, the concerns identified by the reviewing agencies must be addressed prior to project implementation. The state's continued concurrence will be based on the activity's compliance with FCMP authorities, including federal and state monitoring of the activity to ensure its continued conformance, and the adequate resolution of issues identified during this and subsequent regulatory reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting process in accordance with Section 373.428, *Florida Statutes*.

Thank you for the opportunity to review the proposed project. Should you have any questions regarding this letter, please contact Ms. Lauren P. Milligan at (850) 245-2170.

Yours sincerely,



Sally B. Mann, Director  
Office of Intergovernmental Programs

SBM/cjs  
Enclosures

cc: Dianne Hughes, DEP Southeast District  
Martin Markovich, FDOT



# Florida

Department of Environmental Protection

"More Protection, Less Process"



Categories

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<b>Project Information</b>	
<b>Project:</b>	FL201101275618C
<b>Comments Due:</b>	03/07/2011
<b>Letter Due:</b>	03/21/2011
<b>Description:</b>	FEDERAL AVIATION ADMINISTRATION - FINAL ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED AIRFIELD IMPROVEMENT PROJECT AT PALM BEACH INTERNATIONAL AIRPORT - WEST PALM BEACH, PALM BEACH COUNTY, FLORIDA.
<b>Keywords:</b>	FAA - FEIS, AIRFIELD IMPROVEMENT PROJECT AT PALM BEACH INTERNATIONAL AIRPORT
<b>CFDA #:</b>	20.106
<b>Agency Comments:</b>	
<b>TREASURE COAST RPC - TREASURE COAST REGIONAL PLANNING COUNCIL</b>	
The proposed project is consistent with the Strategic Regional Policy Plan. It supports Regional Goal 8.1 - Public facilities which provide a high quality of life.	
<b>PALM BEACH -</b>	
No Comments	
<b>TRANSPORTATION - FLORIDA DEPARTMENT OF TRANSPORTATION</b>	
<p>FDOT's Aviation Office has no comments. Military Trail, Southern Blvd, &amp; I-95 are located adjacent to PBIA AIP. The FEIS indicates that the proposed Near-Term AIP will include a proposed entrance road to the PBIA facilities from Military Trail. This entrance will cross FDOT ROW. The PBIA will be responsible for coordinating with Palm Beach Permits Manager Brett Drouin at (561) 432-4966 &amp; for obtaining the necessary FDOT permits prior to project activities within or connecting to FDOT ROW. Changes in runway configuration are expected to alter existing flight paths over these state roads. FDOT has aerial rights over its ROW. It is expected that changes in flight paths over FDOT ROW will require coordination with FDOT D4, including the potential requirement for the completion of easement/agreement documents (e.g., aviation easements p. ES-108). Issuance of permits from FDOT may be required for project activities located within FDOT ROW. Environmental permit applications associated with proposed activities within FDOT ROW will require close coordination with FDOT. If any impacts will occur to environmental resources located within FDOT ROW, please coordinate with the FDOT D4 PL&amp;EM office (Ann Broadwell, Environmental Administrator for FDOT District 4, at (954) 777-4325 or ann.broadwell@dot.state.fl.us). If any FDOT ROW or property will be used for the installation of facilities, storage/staging of equipment, materials, or vehicles, please notify the FDOT D4 PL&amp;EM with appropriate project-specific plans/details. Planned roadway projects within the vicinity of this project should be considered. Should the need for lane closures/traffic channeling on the state roadway system arise, Maintenance of Traffic Plans (Traffic Operations Office (954) 777-4407) will be required. If any hazardous materials will need to be transported on FDOT roads, a hazardous spills response plan will need to be prepared &amp; coordination with FDOT D4 Maintenance Permits Office will be required.</p>	
<b>ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION</b>	
<p>Staff of the DEP's Southeast District Office confirm statements contained in the FEIS indicating that petroleum and hazardous waste contamination assessments and cleanup activities will be required for several existing airport properties and proposed acquisition sites in accordance with Chapters 62-770 and 62-780, F.A.C. In the event additional contamination is detected during construction, the DEP should be notified and Palm Beach County may need to address the problem through additional assessment and/or remediation activities. Projects involving dewatering should be discouraged, due to the potential for spreading contamination to previously uncontaminated areas off-site and affecting contamination receptors, site workers and the public. Dewatering associated with the construction activities may also be subject to NPDES permitting under Rule 62-621.300(1)-(2), F.A.C., and/or require other permits or approvals from the South Florida Water Management District's Water Use Section. The enclosed DEP memorandum provides additional recommendations from DEP's Waste Management and Air Resource Management staff.</p>	
<b>SOUTH FLORIDA WMD - SOUTH FLORIDA WATER MANAGEMENT DISTRICT</b>	
The airport is covered under an existing Surface Water Management Permit. A modification to that permit will be necessary for the proposed new facilities.	

## Memorandum

## Florida Department of Environmental Protection

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**DATE:** March 9, 2011

**TO:** Chris Stahl, Environmental Specialist  
Office of Intergovernmental Programs

**THROUGH:** Chad Kennedy, Program Administrator  
Southeast District Watershed Management & Planning

**FROM:** Dianne Hughes, Permitting Supervisor  
Southeast District Watershed Management & Planning

**RE:** Final Environmental Impact Statement (FEIS) for Proposed Airfield  
Improvement Project, Palm Beach International Airport, Palm Beach  
County, Florida, SAI #: FL201101275618C

The Southeast District Office has reviewed the subject document received on January 28, 2011. The following program specific comments are provided for your consideration.

### **General Comments:**

The Palm Beach County Department of Airports has proposed an Airfield Improvement Project that includes the construction of a new runway, relocation and extension of existing runways and taxiways, installation of navigational aids, relocation of 750 linear feet of the Airport West Canal, acquisition of 16.2 acres of land west of the airport and other improvements. The document discusses the various alternatives, along with advantages and disadvantages of each.

### **Permits/Authorizations Needed:**

In accordance with the operating agreement between the South Florida Water Management District (SFWMD) and the Department, the SFWMD has regulatory authority over Environmental Resource Permitting for this project.

Any dewatering associated with the construction activities may be subject to NPDES permitting under Rule 62-621.300(2), Florida Administrative Code (F.A.C.), if discharge is to surface waters. Also, as noted in Section ES 5.5.9, some sites may be contaminated by petroleum products and subject to NPDES permitting under Rule 62-621.300(1), F.A.C. Dewatering during construction may also require permits/approval from the SFWMD, Water Use Section.

**Recommendations:**

Page ES-20 discusses potential property acquisitions along Military Trail between Southern Boulevard and Belvedere Road. Phased "Environmental Audits" would need to be conducted on those parcels - many appear to be handlers of hazardous materials and used oils. Page ES-82 identifies contamination in soils (oil and grease) and groundwater (lead) at the former ARFF fire training pits. Pages ES-82 and ES-95 recognize several sites with environmental concerns involving hazardous materials handling and storage (active and former) exist at the airport. It is expected that contaminants relating to past or current operations may be discovered during demolition of these facilities. Regardless of the Airfield Improvement Project implemented, it appears that the provisions of Chapters 62-770 and 62-780, F.A.C., will apply to the assessment and cleanup of these areas.

In the event additional contamination is detected during construction, the Department should be notified and the County may need to address the problem through additional assessment and/or remediation activities.

The County/contractors should outline specific procedures that would be followed by the project developers in the event drums, wastes, tanks or potentially contaminated soils are encountered during construction. Special attention should be made to historical land uses (such as solid waste disposal) that may have an effect on the proposed project, including storm water catch basins along with retention and treatment areas.

Any land clearing or construction debris must be characterized for proper disposal. Potentially hazardous materials must be properly managed in accordance with Chapter 62-730, F.A.C. In addition, any solid wastes or other non-hazardous debris must be managed in accordance with Chapter 62-701, F.A.C.

A sediment and surface water sampling plan should be implemented to assess the portions of the Airport West Canal that are planned to be filled and/or relocated.

Projects involving dewatering should be discouraged, since there is a potential to spread contamination to previously uncontaminated areas off-site and affect contamination receptors, site workers and the public.

In order to reduce the number of single occupancy vehicle trips, it is recommended that vigorous consideration be given to promote alternative means of transportation for Palm Beach International Airport employees. Strong encouragement should be provided to promote mass transit, bicycle use, car and van pooling. Implementing designated preferential parking spaces for car pooling is recommended along with consideration of alternative work hours. Emphasis should be given to the establishment of shuttle service between the airport and the proposed multimodal center at the West Palm Beach Tri-Rail

Memorandum  
March 9, 2011  
Page 3 of 3

station. Assistance for transit, bicycle use, car and van pooling program development, implementation and marketing can be obtained, at no-cost, from the South Florida Commuter Services (SFCS). SFCS information can be obtained from the following website: <http://www.1800234ride.com/>. Participation with SFCS will also allow employees free access to their emergency ride home program.

Thank you for the opportunity to comment.



AHansen@wpb.org  
03/21/2011 03:51 PM

To pbia-eis@urscorp.com

cc CWu@wpb.org, DMalone@wpb.org,  
Commissioners@wpb.org, JTagle@wpb.org,  
LFrankel@wpb.org, EMitchell@wpb.org

bcc

Subject City of West Palm Beach Comments on Final EIS for  
Proposed Airfield Improvements at PBIA

Please see attached the City of West Palm Beach's comments regarding the February 4, 2011, Final Environmental Impact Statement for the proposed airfield improvements at PBIA. The original letter is being mailed today to the FAA.

Thank you.

Alex Hansen, AICP  
Senior Planner  
City of West Palm Beach  
(561) 822-1463

(See attached file: City of WPB Comments on FEIS for PBIA.pdf)



City of WPB Comments on FEIS for PBIA.pdf



**Lois J. Frankel**  
**Mayor**  
P.O. Box 3366  
West Palm Beach, Florida 33402  
Telephone: 561/822-1400  
Fax: 561/822-1424  
e-mail: lfrankel@wpb.org

March 21, 2011

Mr. Bart Vernace, PE  
U.S. Department of Transportation  
Federal Aviation Administration  
5950 Hazeltine National Drive, Suite 400  
Orlando, Florida 32822

**Re: Comments on Palm Beach International Airport (PBIA) Airfield Modifications Final Environmental Impact Statement (FEIS)**

Dear Mr. Vernace:

The purpose of this letter is to provide the City of West Palm Beach's comments to the Final Environmental Impact Statement (FEIS) for the proposed airfield modifications to Palm Beach International Airport (PBIA) which are estimated to cost at least \$370 million.

Due to the City's extensive list of comments and given the technical complexity of issues associated with this project and with our comments, we are attaching to this letter a document detailing the City's comments on this project.

We are confident that the attached comments demonstrate that the need for any type of near term or long term components for the expansion of PBIA has not been demonstrated, that the possibility of dealing with any potential future congestion at PBIA through measures other than a runway expansion have not been properly evaluated, and that any new major east/west runway at PBIA would lead to increased noise, vibration, and pollution effects for the surrounding neighborhoods. In addition, approval of near term projects at PBIA such as the acquisition of land and the development of General Aviation facilities, which would only be needed if long term components, such as the new proposed runway, are someday built, is fiscally irresponsible. As a result, the FAA should not approve, conditionally or unconditionally, any short or long term components of the proposed airport expansion. In addition, the FAA should direct PBIA to resubmit a new and complete Environmental Impact Statement when, and if, PBIA decides to come back with a proposal for expansion for their long term components.

Furthermore, we also believe that the significant negative impacts of this proposed expansion will primarily be felt by the residents and businesses within the City of West Palm Beach. Currently, a majority of those impacted by the noise and air pollution generated by PBIA are within the City of West Palm Beach, and we are concerned that the areas of the City impacted are likely to increase with this proposed airport expansion.

*"Equal Opportunity Employer"*

March 21, 2011

Page 2 – Comments on PBIA Airfield Modifications FEIS

We request your full consideration to our comments and concerns as reflected in the attached document. We believe that a careful review of our concerns will lead to FAA's agreement with the issues raised by our City. If you have any questions, please contact Alex Hansen, Senior Planner, at (561) 822-1463.

Sincerely,



Lois J. Frankel  
Mayor

**Attachments:**

City of West Palm Beach's Comments for the Final Environmental Impact Statement (FEIS) for Proposed Airfield Improvements at Palm Beach International Airport (PBIA) dated February 4, 2011

C: West Palm Beach City Commissioners  
Palm Beach County Board of County Commissioners  
Mayor and Town of Palm Beach Council  
U.S. Senator Bill Nelson  
U.S. Senator Marco Rubio  
U.S. Congressman Allen West  
U.S. Congressman Alcee Hastings  
Ed Mitchell, City Administrator  
Robert Weisman, County Administrator  
Peter B. Elwell, Town of Palm Beach Manager  
Bruce Pelly, Director PBC Dept. of Airports  
Claudia McKenna, Esq, City Attorney  
Alex Hansen, AICP, City Senior Planner  
James W. Beasley, Attorney for Mar-A-Lago

**City of West Palm Beach's Comments for the Final Environmental Impact Statement (FEIS) for Proposed Airfield Improvements at Palm Beach International Airport (PBIA) dated February 4, 2011**

The City of West Palm Beach has significant concerns regarding the impacts of the proposed Palm Beach International Airport (PBIA) expansion project and requests that the Federal Aviation Administration (FAA) DENY, through the findings and conclusions of the Final Environmental Impact Statement (FEIS), the County Department of Airports' request for conditional and unconditional approval for any short term or long term components of this project.

The FAA repeatedly indicates throughout the FEIS, that current Airport operations and forecasts *do not* support approval of its plan to build a new runway at the Airport, with an estimated cost of at least \$370 million. The most recent FAA forecasts indicate that delays at the Airport will not occur until after 2030, if ever. Further, the proposed new runway will not alleviate the hypothetical delays if they ever do materialize. Finally, there are other more effective and economical ways to alleviate Airport delays if they ever become a problem.

Please see below the City's comments and concerns regarding the FEIS for PBIA. We are confident that the arguments outlined below demonstrate that there are important flaws with the justification, methodologies, and data used on the FEIS and that as a result, the proposed project should be rejected by the FAA.

**1. Problems with splitting the project into Near Term and Long Term components**

The City has significant concerns with the FAA's apparent decision to allow for piece meal development at PBIA by agreeing with PBIA's request to split the proposed airport expansion into a "Near Term" project and a "Long Term" project even though many of the elements of the Near Term project are needed only if the Long Term project is developed. The Near Term project, as proposed by PBIA, would include: a) the construction of General Aviation (GA) facilities in the northwest quadrant of PBIA; b) the widening of existing Taxiway L from 50 to 75 feet; and, c) the acquisition of over 13 acres of property along the western PBIA property line. The Long Term project would include:

a) acquisition of additional properties; b) the construction of a new additional major east/west runway; and, c) the relocation and development of additional GA facilities. While the FEIS states that many of the components of the Near Term project are independent of the Long Term project, it is evident that several of the Near Term projects would facilitate the eventual construction of the Long Term components. An example of this is the proposed “Near Term” acquisition of properties around Southern Boulevard and Military Trail for the exclusive purpose of being included in the Runway Protection Zone that would only be needed if the proposed long term major east/west runway is built. In addition, it appears that many of the components of the Long Term project could not be constructed without the completion of the Near Term projects.

Furthermore, the FEIS indicates its support for the Near Term components while indicating that the Long Term components would be considered by the FAA for approval only when the number of aircraft operations at PBIA returns to levels that would cause unacceptable aircraft delays. The FEIS indicates that the cost of the overall PBIA expansion proposal (Near Term components and Long Term components) is approximately \$370 million. However, the FEIS does not provide the total cost for the proposed Near Term components, but it is reasonable to believe that their cost would be several dozen millions of dollars. It appears a huge waste of public funds to approve a costly set of Near Term projects which are directly linked to the Long Term projects, and which are needed only if the Long Term project is realized, without even knowing if the Long Term projects will ever be needed, approved or completed.

## **2. Flaws with the Project’s Justification and Demand Projections**

The City continues to question the flawed premise that this project is needed in order to reduce future congestion and delays at PBIA as airport activity grows. Aircraft operations at PBIA have decreased significantly over the last 30 years. PBIA had 271,674 operations in 1979, 239,991 operations in 1990, 214,327 operations in 2000, and 141,387 operations in 2010, for a decrease in activity of almost 50% over those three decades. As shown by this data, the decrease of activity at PBIA is not a new phenomenon “caused by the recent nationwide economic recession” as stated in page ES-2 of FEIS, but is rather a reflection of a pattern of long term decline in airplane activity at PBIA which has been caused by a multitude of factors.

Even though airplane activity at PBIA decreased significantly during the last three decades, the annual activity forecasts for PBIA generated by the FAA and by the Airport during that same period continually overestimated future activity for PBIA and inaccurately predicted future increases in airplane activity. Despite the lack of reliability of PBIA's activity forecasts, it appears that the FEIS continues to rely on forecasts which use a methodology that for the last 30 years has continually overestimated future activity at PBIA. The City believes that an analysis of the historical data shows that the methodologies used to develop PBIA's activity forecasts have been wildly inaccurate, and unless they are proven to be more reliable in the upcoming years, these methodologies should not be used as the primary method to predict PBIA's future activity levels and should not be continue to be used by the FAA to determine whether PBIA should be expanded.

### **3. Lack of Validation of Existing and Projected Aircraft Delay Figures**

The FEIS repeatedly states that several studies conducted by the FAA for the EIS process showed that "unacceptable aircraft delay has historically occurred at PBIA under the existing airfield configuration." (FEIS Page 2-8) Also, a letter from Bruce Pelly, the Director of the County's Department of Airports, to the FAA, dated January 6, 2010, references the "intense congestion and delays that PBIA experienced as recently as 2007" . Moreover, the FEIS claims that "The FAA expects that similar delays at PBIA may again occur when the number of aircraft operations at PBIA returns to previously experienced levels. Such an occurrence would be consistent with the moderate, consistent growth trend predicted in the FAA's 2009 TAF. The FAA found that the average annual delay per aircraft operation at PBIA in 2006 was approximately 4.8 minutes, with approximately 204,054 annual aircraft operations. In the September 2008 DEIS, it was estimated that annual aircraft delay would reach approximately 10.2 minutes when the number of annual aircraft operations reached 221,693 and approximately 20.6 minutes when annual operations reach 238,457." (FEIS Page 2-8). The FEIS now calls the yet to be determined year when operations at PBIA reach 221,693 as Long Term Study Year 1, or LTSY 1, and the also yet to be determined year when the Airport reaches 238,457 operations as Long Term Study Year 2, or LTSY 2.

With all these references about recent and future congestion and delays at PBIA it would be reasonable to expect that the FEIS would include in its analysis actual delay figures for some of the past years (such as 2006 and 2007) which experienced “intense congestion and delays” as indicated by Mr. Pelly and the FAA. Nevertheless, the delay numbers included in the FEIS for the years 2006, 2013, and 2018 were based exclusively on figures developed by a computer modeling software (SIMMOD), and in the case of the 2006 modeled delays, they were never calibrated or validated with the real-time on the ground delay data at PBIA for that year. A validation or calibration of the 2006 delays modeled by the computer with the actual on the ground delay information collected for PBIA during that year would permit to determine whether the delay figures projected for the undetermined years LTSY 1 and LTSY 2 are being forecasted with any degree of accuracy.

Since the levels of delay forecasted by the modeling software for LTSY 1 and LTSY 2 are being used as the main justification of need for this massive and expensive proposed airfield expansion project, the City requests to the FAA that a ground validation of the 2006 modeled delays be performed to determine the reliability of this modeling software for usage in PBIA before any further studies are conducted, and before any short term or long term airport expansion project approvals are issued.

An issue that was identified in the comments provided by the City to the Draft Environmental Impact Statement (DEIS) released by the FAA in 2008, but that was never properly answered by the FAA, is the request to provide a quantitative analysis of how much of the presumed delay at PBIA is caused by the physical configuration of the Airport versus how much delay is actually caused by airspace issues and other factors such as weather or delays at other airports (See Comment/Response 1-130 in Appendix K. of the FEIS). Inclusion of this analysis in the FEIS could result in more alternatives meeting the purpose and need without having to spend hundreds of millions of taxpayer dollars in physical capacity improvements at the Airport.

#### **4. Concerns with PBIA's Annual Service Volume (ASV) Capacity Analysis**

FEIS *Chapter 2.0 Purpose and Need* indicates that the theoretical ASV runway capacity for PBIA would be reduced from 263,444 annual operations for the years 2006 and 2013 to 221,039 operations for the year 2018. This decrease in capacity is based on the assumption that the number of larger-sized commercial service aircraft serving PBIA will increase between the years 2013 and 2018, hence requiring additional separation distances for aircraft arrivals and departures. According to the FEIS, the additional separation arrivals and departures would result in decreases in the overall number of hourly landing or departures with the result of the ASV for the existing airfield being projected to become "slightly" lower over time (primarily between 2013 and 2018).

The City finds several problems with these conclusions reached in the FEIS. First, the ASV capacity reduction from 263,444 to 221,029 operations results in a reduction of annual airport capacity of 16%, which clearly is not "slight" as is stated in the FEIS. Second, this reduction of capacity allegedly caused by an increase in the number of larger commercial planes using PBIA would take place very abruptly in a period of only five years, sometime between 2013 and 2018. Third, the significant assumption made in the FEIS that these larger planes causing the reduction of airport capacity will start servicing PBIA sometime between 2013 and 2018 is not properly explained in the document and is not supported by any data or analysis contained in the FEIS. While the FEIS indicates that the assumption for the change in future capacity at PBIA is part of a 2006 study by CH2M Hill, the FAA does not adequately document and support this type of assumption in the FEIS. These concerns (the assumption of significant and sudden change of the aircrafts using PBIA and the lack of data supporting this assumption) were included in the City's comments to the DEIS. *FEIS Appendix K. Consolidated Comment/Response Database* identifies these concerns as comments 1-134, 1-135. However, the FAA's responses to these questions refer to answer 1-115 which is the FAA's boilerplate answer indicating that the Airport Sponsor deemed it necessary to re-evaluate the implementation plan and schedule for the proposed project at PBIA because 2009 Terminal Area Forecast (TAF) for PBIA showed a significant decrease of future activity in relation to previous TAFs.

Clearly the FAA answer does not address the issues raised by the City's comments, so through this letter the City requests that the FAA provide adequate data to justify these

important assumptions. Proper clarification of the issues indicated above is critical because if the alleged reduction of capacity at PBIA due to changes in the fleet mix does not occur as is predicted by the FEIS, then any potential future need to provide additional capacity at PBIA would be delayed by several decades. In addition, when, and if, PBIA decides to come back with a request for approval of the long term components of this project, the FAA should require that a new analysis regarding PBIA's future ASV Capacity be performed at that time.

Finally, as previously indicated in the City's DEIS comments (Comment 1-136 of FEIS Appendix K) if the EIS is correct and larger commercial passenger planes start servicing PBIA in the period between 2013 and 2018, then those larger planes would be replacing smaller commercial passenger planes, with these larger commercial planes being able to carry more passengers than the smaller commercial planes that currently serve PBIA. One logic conclusion would then be that a lower number of these larger planes would be needed to carry the same number of passengers than before, and should logically lead to a reduction in the number of commercial planes needed to serve future passenger activity at PBIA. Based on the FAA's response to City Comment 1-136 it appears that the question was not properly understood by the FAA staff. The City requests that the FAA properly address this comment and explain why the FAA assumptions about larger commercial passenger planes serving PBIA in the future would not then logically result in less planes being needed to serve the same number of passengers than before.

#### **5. Flaws with the Future Demand versus Future Capacity Analysis for PBIA**

FEIS Table 2.5.1-1 (FEIS Page 2-13) shown below is an attempt by the FAA to provide a comparison of forecasted demand and ASV runway Capacity for undetermined future years. The table appears to show that for the undetermined Future Year 2 operations at PBIA will closely approach or exceed the airports forecasted ASV capacity, with projected volumes at 84% of capacity, and that the operations forecasted for undetermined Future Year 3 will be 108% of the airport capacity. The FEIS then uses those results to indicate that before PBIA reaches the activity levels for Future Year 2 and Future 3, additional capacity should be provided in the form of a new runway.

**FEIS TABLE 2.5.1-1  
ASV VS. AIRCRAFT OPERATIONAL DEMAND  
PBIA EXISTING AIRFIELD CONFIGURATION**

<b>Forecast Category</b>	<b>2009 Actual</b>	<b>Future Year 1<sup>3</sup></b>	<b>Future Year 2<sup>3</sup></b>	<b>Future Year 3<sup>3</sup></b>
Forecast Annual Operations <sup>1</sup>	138,370	204,054	221,693	238,457
ASV <sup>2</sup>	263,444	263,444	263,444	221,039
Demand as a percent of ASV	52%	78%	84%	108%

Sources:

<sup>1</sup> PBIA ANOMS 2009; FAA’s 2009 TAF, December 2009.

<sup>2</sup> *Palm Beach International Airport System Study - Phase I PBIA Airspace/Airfield Constraints Analysis*, CH2M Hill, November 2005, Table 3-11.

<sup>3</sup> Future years to be determined based on actual rate of operational recovery at PBIA. Operations numbers are representative of the September 2008 DEIS operations for study years 2006, 2013, and 2018.

A significant flaw with this future demand versus future capacity analysis is that it makes assumptions that try to match operational demand forecasts for future analysis years which have yet to be determined, but which will likely be at least 20 or 30 years in the future, based on the 2009 PBIA forecasts, with projected ASV capacity figures for PBIA which were developed specifically for certain years (the period from 2006 to 2018), were calculated based on assumptions about the fleet mix at PBIA for those specific years, and should not be used to determine airport capacity or demand to capacity ratios for future analysis years that are well outside of the timeframe for which they were originally developed. As a result, the above data should not be used in this FEIS to determine at which future activity level PBIA would need additional capacity in the form of a new runway.

**6. Lack of Adequate Evidence for Peak Hour Calculations**

While the FAA indicated in the FEIS that peak hour operational capacity is a critical factor in an airport’s ability to provide and maintain a high degree of operational efficiency, there is only a brief section in the FEIS dealing with Peak Hour Demand and Weighted Average Hourly Capacity at PBIA. The FEIS states that the Airport has a weighted average hourly capacity of 64 peak hour aircraft operations and that “when comparing the projected number of rolling peak hour aircraft operations (operational demand) against the calculated weighted peak hour capacity of the airfield at PBIA, it is evident that PBIA’s airfield configuration would not provide the needed peak hour capacity to efficiently serve projected levels of peak hour operational demand if the number of annual aircraft operations at PBIA reach the levels shown in **Table 2.5.1-2.**” (FEIS 2-13).

**FEIS TABLE 2.5.1-2  
WEIGHTED AVERAGE HOURLY CAPACITY AND PEAK HOUR DEMAND  
EXISTING AIRFIELD CONFIGURATION**

Forecast Category	204,054 Operations <sup>3</sup>	221,693 Operations <sup>3</sup>	238,457 Operations <sup>3</sup>
Weighted Average Hourly Capacity <sup>1</sup>	64	64	64
Rolling Peak Hour Demand ASV <sup>2</sup>	69	73	79
Net Excess (Shortfall) of Hourly Capacity	(5)	(9)	(15)

Sources:

1 *Palm Beach International Airport System Study - Phase I PBIA Airspace/Airfield Constraints Analysis*, CH2M HILL, November 2005, Table 3-11.

2 As derived using SIMMODTM modeling assumptions developed by Ricondo & Associates and the FAA-approved forecast of aviation activity for PBIA at the time the September 2008 DEIS was prepared and published (2006 PBIA MPU forecasts).

3 Operations numbers are representative of the September 2008 DEIS operations for study years 2006, 2013, and 2018. Updated by URS Corporation, March 2010.

A significant problem with this section of the FEIS is that the FAA does not explain the key question of how peak hour activity is defined in the document. The FAA needs to clearly explain whether peak hour demand activity is defined as the peak hour of activity for the average annual day at PBIA or whether it is defined using other criteria, such as the peak hour for the Peak Month Average Day (PMAD) or the peak hour for the Average Busy Day (ABD). The peak hour of activity for the PMAD or the AVD are activity conditions that occur for only a handful of hours a year and should not be generalized to represent or project the activity levels during the other thousands of hours of annual activity at PBIA. When the City provided this same comment as part its DEIS comments, the FAA responded that “Details regarding how the peak hour capacity is calculated are sourced beneath Table 2.5.1-2 of the FEIS. The commenter is referred to these documents to read details regarding peak hour calculations.” (Response 1-138 of FEIS Appendix K) The City’s review of the sourced documents still did not provide a clear answer to the question as to how the peak hour demands were calculated for PBIA. As a result, we still request a clear response as to how peak hour activity and peak hour demands were calculated and defined in the FEIS.

The City’s concern on this issue is that the peak hour demands that the FEIS depicts in the table above may be a condition that occurs, or could occur in the future, for only a few hours on a handful of days during the winter high season. An expenditure of \$370 million at PBIA is clearly not justified if the peak hour demands and shortfalls of hourly capacity depicted in the table above occur only during these very limited periods.

## **7. Lack of Detailed Evaluation of Alternatives Other Than Runway Modifications**

The FAA continues to indicate that other strategies to address any potential future congestion at PBIA are not viable, including the possible expansion of facilities at the North County Airport, a County owned and operated airport built in the mid 1990s and located approximately only 10 miles north of PBIA. North County Airport has an area of 1,832 acres, which is similar to the area of PBIA (2,120 acres), meaning that it has sufficient space to accommodate a potential facility expansion. In addition, there is very limited development in the vicinity of the airport and, as such, impacts on residential areas would be minimal.

Expansion of the runway and other facilities at North County Airport would allow almost all General Aviation planes to use the North County Airport. Currently, over 60% of all airplane activity at PBIA is from General Aviation activity. Even the FEIS indicates that “owners/operators choose to operate at PBIA because of PBIA’s GA support services that cater to large corporate and executive-class aircraft. In addition, the viability of operating these larger GA aircraft at other County-owned airports is extremely limited because of the lack of needed aviation facilities (runway length) and comparable levels of service.” (FEIS 3-44) The North County Airport should receive adequate funding to achieve its originally intended role as a GA reliever to PBIA so that more GA activity could be shifted from PBIA to North County Airport, thereby freeing up more capacity at PBIA. The cost of these improvements at the North County Airport would be insignificant when compared to the hundreds of millions of dollars planned to be spent on expanding PBIA.

A future demand analysis for North County Airport should be conducted as part of the FEIS before this alternative is summarily discarded, and the analysis would need to consider the recent construction of the Scripps Research Institute and other important biomedical facilities in the northern part of Palm Beach County and the convenient location of the North County Airport to those facilities. It appears reasonable to believe that future GA activity at North County Airport would increase if the additional facilities were to be built by the County and that the airport would be able to accommodate such capacity increase.

## **8. Deficient Evaluation of Environmental Impacts**

The City's concerns regarding the evaluation of the environmental impacts are centered on the methodologies used to evaluate the air quality and noise impacts resulting from this project and the lack of on the field validation of the computer models used to determine noise impacts.

**Air Quality Impacts:** The air quality section of the FEIS claims that no significant impacts would be expected from implementation of the proposed project and that there is no likelihood that the proposed project would cause levels of air pollution that would exceed the National Ambient Air Quality Standards (NAAQS). Nevertheless, there are several problems with this evaluation which put in to question the conclusions of this section of the study.

Given the current utilization patterns of Runway 10R/28L, about 79% of all operations at PBI A occur on an east-west axis, with the other 21% taking place on a northwest to southeast axis (crosswind Runway 13/31). Since the proposed project would decrease the length, and therefore significantly reduce future use of Runway 13/31, close to 100% of future aircraft operations at PBI A would occur on an east-west axis. This means that the proposed project would result in almost 100% of PBI A's future air quality impacts being felt by those areas located to the west and east of the Airport. The FAA acknowledges in the FEIS that the analysis did not consider that the runway modifications proposed as part of this project would result in a spatial redistribution of the future air quality impacts of the Airport (Response 5-88 of FEIS Appendix K). It is difficult to understand why the FAA would determine not to perform an air quality analysis that would more accurately evaluate the impacts of the proposed project on the neighborhoods surrounding the airport. As a result, and in order to have a better understanding of the impacts of this project, the City requests (as was done previously as part of the City's comments on the DEIS) that the air quality analysis be revised to account for the resulting geographical redistribution of air quality impacts as a result of the runway reconfiguration that would result from the PBI A's expansion proposal.

An additional concern related to the air quality analysis is based on the FAA's decision on the location of the sites where to collect the samples for the Soot Study. None of the six sites selected was located in the areas nearby the airport that are currently most impacted by the soot. The only eastern sample site within the City of West Palm Beach was Petty Park, which is next to the Intracoastal Waterway and quite removed from the Airport. The location of the sites used to collect the soot samples puts into question the reliability of the results of the study and requires that the FAA redo this study while using sites that more appropriately reflect the areas that are most affected by the soot generated by the aircrafts. This comment was also previously provided to the FAA and their response was that "the sites were selected to enable the comparisons of atmospheric deposition samples collected at the airport, under the flight paths, in the neighboring communities, near roadways, and at a background location" (Response 5-90 of FEIS Appendix K). Such a response does not address the issue that the locations selected by the FAA for the sample collection were completely inadequate and would appear to prevent the proper measurement of impacts in the areas that would be the most affected by the project and as such, the study should be revisited.

**Noise Impacts:** A key concern regarding the noise impact study portion of the FEIS is that it relies exclusively on computer noise models to assess both existing, as well as future noise levels around the airport. The FAA determined not to use any on the ground noise monitoring stations to establish current noise levels or to validate and calibrate the noise contours developed by the modeling effort. Because the FAA uses computer modeling for the noise analysis, it is essential that the accuracy of the model is established for the current study by comparing the results of computer simulations with the corresponding field measurements of the noise monitoring network. In response to public comments requesting the use of noise monitoring stations around PBI to assess current noise levels, the FAA indicated that "in accordance with FAA guidance, noise monitoring data may be included in an EIS at the discretion of the responsible FAA official. The FAA did not approve the use of PBI noise monitoring in the FEIS. FAA guidance (Order 1050.1E) states that noise monitoring is not required and should not be used to calibrate the noise model." (Response 3-108 of FEIS Appendix K)

The FAA has decided not to rely on real current noise data in the neighborhoods around PBIA to accurately assess the current noise impacts and to validate any noise results from the computer model, but rather decided to prepare an EIS noise analysis for a \$370 million airport expansion project using exclusively noise models which may, or may not, have any bearing with actual noise levels in those areas. As the FAA indicated in their response, FAA guidelines do provide discretion on the use of noise monitoring data in an EIS. The City requests that this discretion be used by the FAA to require that the PBIA EIS include a noise analysis that has been validated by the measurements of on the ground noise data.

### **9. Property Values and Quality of Life Impacts**

The City of West Palm Beach is concerned that the proposed project will negatively impact the real estate values of neighborhoods in the airport area. The Proposed Project has the potential of negatively impacting the tax base of the City of West Palm Beach. Furthermore, the City and the public are concerned about the project's effect on quality of life in the City due to the noise, vibration, and airplane particulate discharge. We believe that the enormous negative impacts of this proposed expansion will primarily be felt by the residents and businesses within the City of West Palm Beach.

### **CONCLUSION**

It is clear from the FEIS that the proposed new major east/west runway at PBIA will lead to increased noise, vibration, and pollution effects for the areas of the City of West Palm Beach located east of the Airport, which include several historical neighborhoods designated both at the local and national level, as well as districts with significant numbers of minority population.

As explained throughout this document, the City believes that the need for any type of near term or long term components for the expansion of PBIA has not been demonstrated, that the possibility of dealing with any potential future congestion at PBIA through measures other than a runway expansion have not been properly evaluated, and that any new major east/west runway at PBIA would lead to increased noise, vibration, and pollution effects for the surrounding neighborhoods. In addition, the City feels that approval of near term projects at PBIA which would only be needed if the long term

components are someday built is fiscally irresponsible. As a result, the FAA should not approve any components of the proposed airport expansion and should direct PBIA to resubmit a new and complete Environmental Impact Statement when, and if, PBIA decides to come back with a proposal for expansion.

From: ABoyles@TownofPalmBeach.com

To: Bart Vernace/ASO/FAA@FAA

Date: 03/21/2011 11:29 AM

Subject: Comments to Environmental Impact Statement, Palm Beach International Airport, Palm Beach County, Florida, February 4, 2011

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Thomas G. Bradford  
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PLEASE NOTE: Florida has a very broad public records law. Most written communications to or from the Town of Palm Beach officials and employees regarding public business are public records available to public and media upon request. Under Florida law e-mail addresses are public records. If you do not want your e-mail address released in response to public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. If you have received this message in error, please notify us immediately by replying to this message, and please delete it from your computer. Thank you.



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# TOWN OF PALM BEACH

Office of the Town Manager

March 21, 2011

Mr. Bart Vernace, PE  
U.S. Department of Transportation  
Federal Aviation Administration  
5950 Hazeltime National Drive, Suite 400  
Orlando, FL 32822

**VIA EMAIL ([bart.vernace@faa.gov](mailto:bart.vernace@faa.gov))**  
**AND FIRST CLASS MAIL**

Re: Comments to Final Environmental Impact Statement,  
Palm Beach International Airport, Palm Beach County, Florida, February 4, 2011

Dear Mr. Vernace:

These comments pertain to the February 4, 2011, Final Environmental Impact Statement (FEIS) for the proposed airfield improvement project for Palm Beach International Airport (PBIA), Palm Beach County, Florida, and are submitted on behalf of the Town of Palm Beach, Florida, a Florida municipal corporation, for the consideration of the Federal Aviation Administration (FAA) in its Record of Decision.

## **Town of Palm Beach Comments to PBIA FEIS, February 4, 2011**

- 1) The Town of Palm Beach is supportive of a FAA decision to consider approval of any new commercial runway only when air traffic reaches levels that would cause unacceptable delays and only after known, less costly alternatives to runway extensions, including, but not limited to, the diversion of additional private jet traffic to the Palm Beach County Department of Airports, North County Airport, are fully vetted. These known, less costly alternatives should be given full consideration based upon all pertinent factors and existing conditions at that point in time should air traffic reach levels at PBIA that would cause unacceptable delays.
- 2) Notwithstanding any alleged FAA requirements emanating from the Council of Environmental Quality or the National Environmental Policy Act of 1969 regarding potential environmental impacts, the Town of Palm Beach questions the efficacy of the FAA going on record as favoring the Palm Beach County Department of Airports proposed Airfield Improvement Project (AIP) which includes a plan to extend the southernmost general aviation runway from 3,210 feet to 8,000 feet since the FEIS determined that such long-term projects are not ripe at this time. At a minimum, it is premature for the FAA to state an AIP preference in this market and environment since another EIS would be required in the future if air traffic reaches levels that would cause unacceptable delays. Circumstances (Purpose

and Need criteria) affecting runway alternatives could change from those that exist today compared to some unknown time in the future. Why encourage the Airport Sponsor to focus on one costly resolution to a problem that may occur in the future in an environment totally different from today?

- 3) In regard to the short-term project, including the widening of a taxiway and buying property along Military Trail and the apparent decision of the FAA to deem this work as providing no harm, the Town of Palm Beach has no comment.

Please review and consider all comments on the FEIS and respond to the same in the FAA's Records of Decision. Your time and efforts in regard to this response to the FEIS is greatly appreciated.

Sincerely,



Thomas G. Bradford  
Deputy Town Manager

TGB/ab

cc: Mayor and Town Council  
Peter B. Elwell, Town Manager  
John Page, Director of Planning, Zoning, and Building