

APPENDIX A

FEIS COMMENTS AND RESPONSES

This appendix contains copies of agency and public comments received by the FAA during the FEIS review and comment period. Agency and public comments are indexed by commenter. [Appendix A](#) also contains the FAA's responses to agency and public comments.

FEIS COMMENT/RESPONSE DATABASE INDEX ORGANIZATION

FEIS Comment/Response Database Index

This FEIS Comment/Response Database contains an index of those parties who submitted comments to the Federal Aviation Administration (FAA) during the FEIS review and comment period for the Palm Beach International Airport (PBIA) EIS study. In addition, this database contains a summary of the comments by comment category and the FAA's responses.

Comments were provided to the FAA by letters (provided via mail or fax), written on EIS comment forms, and e-mailed to the EIS e-mail address (pbia-eis@urscorp.com) or directly to the FAA's PBIA EIS Project Manager. For the purposes of the Comment Database, all comment formats are referred to as comment "letters."

Comment Identifier Coding

The database includes an index of Agency Comment letters and Public Comment letters with the name of each party providing a comment and a unique Identifier Code to catalog the submittal. Comment Codes are also provided, which indicate the summarized comments and the FAA's responses applicable to that particular submittal. Federal, state, and local agency letters are listed in alphabetical order by last name and include the area of government in which the individual is associated. Public comments are also listed alphabetically by last name.

Each Identifier Code consists of six characters that represent three fields of information describing each unique comment submittal. The first character makes up the first field and serves as an "Event Code," which describes the period during the study for which the comment was submitted.

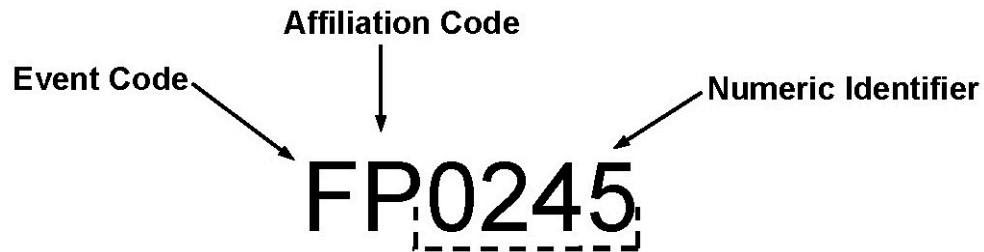
For the FEIS Comment/Response Database, there is one Event Code used in this database:

F = Comments received during the FEIS review period.

The second character represents the "Affiliation Code" that places the party commenting into one of five categories:

F = Comment from a Federal agency
S = Comment from a State agency
L = Comment from a Local agency
P = Comment from the general public
N = Comment by petition

The last four characters represent the third field, which identifies the specific comment submittal numerically. For example, the Identifier Code "FP0245" describes the comment submittal as being the 245th letter or comment form received during the FEIS comment period from the general public.



Each comment submittal was reviewed¹, salient points summarized, and identified with a comment code. The summarized comments and the FAA's responses are provided in [Appendix A-3](#). The summarized comments and responses are organized into 29 categories listed below. For example, Comment Code 1-1 describes the comment was made in regard to Purpose and Need of the Proposed Project and is the first comment recorded under that category.

<u>Category Number</u>	<u>Description</u>
1	Purpose and Need
2	Alternatives
3	Noise
4	Land Use
5	Air Quality
6	Coastal Resources
7	Construction Impacts
8	DOT Act Section 4(f)
9	Farmlands
10	Fish, Wildlife, and Plants
11	Floodplains
12	Hazardous Materials, Pollution Prevention, and Solid Waste
13	Historic and Archaeological Resources
14	Light Emissions and Visual Impacts
15	Natural Resources and Energy Supply
16	Secondary (Induced) Impacts
17	Socioeconomic Impacts
18	Environmental Justice
19	Children's Environmental Health and Safety Risks
20	Water Quality
21	Wetlands
22	Wild and Scenic Rivers
23	Quality of Life
24	Safety
25	Cost Considerations
26	Other Considerations
27	Cumulative Impacts
28	Mitigation Measures
29	Coordination and Public Involvement

¹ The review of comments and the FAA responses included a review of all attachments provided by commenters, but not comment coding of each attachment or development of responses for each attachment.

APPENDIX A-1

INDEX OF AGENCY AND PUBLIC COMMENTS ON FEIS

This appendix contains an index of the agencies, organizations, and members of the public that submitted comment letters to the FAA after the publication of the FEIS.

Agency Comments Index
Palm Beach International Airport EIS

Last Name	First Name	Agency	Letter Code	Comment Number(s)
Bradford	Thomas	Town of Palm Beach	FL0002	2-61, 1-129, 1-130, 2-62
Frankel	Lois	City of West Palm Beach	FL0001	1-102, 1-103, 1-104, 23-6, 1-105, 1-106, 1-107, 1-108, 1-109, 1-110, 1-111, 1-112, 1-113, 1-114, 25-2, 1-115, 1-116, 1-117, 1-118, 1-119, 1-120, 2-54, 1-121, 1-122, 1-123, 1-124, 1-125, 2-55, 2-56, 2-57, 2-58, 2-59, 2-60, 3-19, 5-8, 5-9, 3-20, 3-21, 17-2, 23-7, 23-8, 1-126, 1-127
Kammerer	Laura A.	SHPO	FS0002	13-7
Mann	Sally	Florida State Clearinghouse	FS0001	12-1, 12-2, 12-3, 7-4, 7-2, 7-3, 4-1, 7-5, 7-6, 17-3, 7-7, 12-4, 6-1, 6-2, 6-3, 23-9, 1-131, 20-3, 12-5, 12-6, 12-7, 12-8, 26-54
Mueller	Heinz	EPA	FF0002	3-22, 3-23, 3-24, 3-25, 5-10, 5-11, 5-12, 20-1, 29-12, 3-26, 18-2, 5-13, 1-128, 3-27, 3-28, 5-14, 20-2, 18-3, 29-14
Steele	Willard	Seminole Tribe of Florida	FF0003	13-6
Suiter	Michelle	Town of Glen Ridge	FL0003	29-15
Wrublik	John	U.S. Fish and Wildlife Service	FF0001	26-1

Public Comments Index

Palm Beach International Airport EIS

Last Name	First Name	Letter Code	Comment Number(s)
Accurso	Joseph	FP0001	1-1, 1-2, 1-3, 1-4
Agnew	Paul	FP0002	1-5
Agnew	Paul	FP0003	3-1, 1-6, 26-2
Beasley Jr.	James	FP0040	1-62, 26-35, 1-63, 1-64, 1-65, 1-66, 1-67, 2-12, 2-13, 2-14, 2-15, 2-16, 2-17, 26-36, 1-39, 1-68, 1-69, 1-70, 26-20, 1-71, 1-72, 1-73, 1-74, 26-37, 26-38, 26-39, 26-40, 1-75, 1-76, 1-77, 2-18, 1-78, 1-79, 1-80, 1-81, 1-82, 1-83, 1-84, 1-85, 1-86, 1-87, 1-88, 1-89, 1-90, 1-91, 1-92, 1-93, 26-41, 2-19, 2-20, 1-94, 1-95, 1-96, 1-97, 2-21, 2-22, 2-23, 2-24, 2-25, 2-26, 2-27, 2-28, 2-29, 2-30, 2-31, 2-32, 2-33, 2-34, 2-35, 2-36, 2-37, 2-38, 2-39, 2-40, 2-41, 2-42, 2-43, 2-44, 2-45, 2-46, 2-47, 2-48, 2-49, 2-50, 2-51, 26-42, 26-43, 26-44, 26-45, 26-46, 13-3, 13-4, 3-7, 3-8, 3-9, 3-10, 3-11, 3-12, 3-13, 3-14, 3-15, 5-4, 5-5, 5-6, 26-47, 26-48, 7-1, 26-49, 26-50, 26-51, 26-59
Bradburn	Carrie	FP0004	1-7
Burgess	Jonathan	FP0005	26-3, 23-1, 1-8, 1-9, 1-10
Cao	Quan Anh	FP0006	26-4
Clark	Melinda	FP0007	1-11
Conboy	Tom	FP0008	1-12, 26-5, 1-13, 1-14, 26-6, 1-15, 1-16, 1-17, 1-18, 1-139, 1-98, 1-19, 1-99, 2-1, 26-7, 26-8, 26-9, 1-20, 26-10, 1-21, 1-22, 26-11
Diaz	Carlos	FP0009	29-1
Farmer	John "Cy"	FP0047	26-58
Foot	Robert	FP0010	1-23, 3-2
Foot	Virginia		
Goldstein	Joe	FP0011	29-2
Goodwin	Gary	FP0045	1-135, 1-136
Gray	Bailey	FP0012	1-24, 1-25
Gray	Bailey	FP0013	26-12, 26-13, 26-14, 26-15, 1-26, 1-27, 29-3, 29-4
Gustafson	Brian	FP0042	1-132, 2-63, 26-55
Hall	Donna	FP0014	1-28, 3-3, 1-29
Hammer	Gael	FP0046	1-137, 1-138
Inglis	John	FP0015	1-30, 26-16
Janis	Melodie	FP0017	3-4, 5-1, 23-2, 1-31, 1-32
Karson	Annabeth	FP0018	1-33
Kelley	Lorie	FP0043	1-133
Keyes	Hillary	FP0019	1-34
Kleinfeld	Mark	FP0044	1-134, 2-64, 26-56, 29-13, 26-57
Laws	Tina	FP0052	1-145, 26-73, 1-146, 13-9
Levine	Alan	FP0050	1-142, 29-16, 26-70
Markfield	Pearl	FP0020	1-35
Martin	Drew	FP0021	1-36
Mehler	Charles	FP0022	1-37
Merritt	Elizabeth	FP0041	13-5, 1-100, 1-101, 26-52, 26-53, 3-16, 3-17, 3-18, 2-52, 5-7, 29-11, 2-53, 13-8
Moss	Bill	FP0023	26-18
Pearson	Tom	FP0024	1-38, 26-19, 26-5, 1-13, 1-14, 26-6, 1-15, 1-16, 1-17, 1-18, 1-98, 1-19, 1-99, 2-1, 26-7, 26-8, 26-9, 1-20, 26-10, 1-21, 1-22, 26-11
Pullum	Nancy	FP0025	29-5, 1-40, 1-41, 1-42, 1-43, 1-44, 25-1, 1-45
Purvis	Lynne	FP0026	1-55
Rocchio	Joseph	FP0049	1-141, 26-67, 26-68, 26-69
Rodriguez	Jose	FP0028	29-6, 18-1, 29-7, 29-8, 26-21, 26-22, 26-23
Rodriguez	Jose	FP0029	29-9, 29-10
Romano	Maria	FP0030	1-46, 13-1, 2-2, 26-24
Rooney	Stuart	FP0031	1-47, 26-25, 26-26
Schrotenboer	Robert	FP0032	26-27, 5-2, 1-48
Statham	Rodney	FP0033	1-49
Trump	Donald	FP0039	26-30, 26-31, 1-56, 1-57, 2-6, 1-58, 2-7, 2-8, 2-9, 2-10, 1-59, 1-60, 2-11, 26-32, 26-33, 26-34, 1-61
Turcotte	Brian	FP0051	1-143, 1-144, 26-71, 26-72
Virata	Michael	FP0034	23-3, 2-3, 1-50
Virata	Carsey		
Weiss	Greg	FP0035	26-28, 26-29
Wellington	Joyce	FP0036	3-5, 5-3, 17-1, 2-4, 2-5, 3-6, 1-51, 23-4
Willieford	Steve	FP0037	1-52
Workman	Mary Rowan	FP0038	1-53, 13-2, 23-5, 1-54
Yoakley Inglis	Mary	FP0016	1-30, 26-16, 26-17
Young	James	FP0048	26-60, 26-61, 1-140, 26-62, 26-64, 26-65, 26-66
Young	Lila	FP0053	26-74, 1-147, 1-148, 1-149, 26-75, 26-76
	Reilymd1	FP0027	10-1

APPENDIX A-2

COMMENT LETTERS

This appendix contains a copy of comment letters received after the publication of the FEIS.

**FEDERAL AGENCY & TRIBAL
FEIS COMMENTS**

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

----- 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 Improvment Project Palm Bech International Airport

FYI

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| From: |
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| John_Wrublik@fws.gov
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|-----|
| To: |
|----->
|-----|
| Bart
| Vernace/ASO/FAA@FAA
|----->
|-----|
| Date: |
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| 02/09/2011 01:39
| PM
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|-----|
| Subject: |
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| FEIS for Proposed Airfield Improvment Project Palm Bech 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



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 Hazeltime 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.

3 - 22

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).

3 - 23

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.] 3 - 24

[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.] 3 - 25

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 PBIA compared to the No Action Alternative. Air emissions at PBIA 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.] 5 - 10
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.] 5 - 11

[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.] 5 - 12

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).]

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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.]

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[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

3 - 26

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.]

29 - 14

[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.]

18 - 2

[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 PBIA, the Airport Sponsor deemed it necessary to re-evaluate the implementation plan and schedule for the AIP at PBIA. [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 PBIA returns to the levels that would cause unacceptable aircraft operational delay.]

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1 - 128

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.]

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3 - 28

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 PBIA compared to the No Action Alternative. However, largely due to forecasted increases in aircraft operations, the FEIS indicates that criteria-based air emissions at PBIA 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

5 - 14

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).

20 - 2

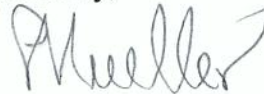
Regarding EJ EPA recommends that the Record of Decision (ROD) clearly indicate the specific type of noise mitigation that will be used should Alternative 2 be selected. We request a copy of the ROD for our review and files.

18 - 3

29-14

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,



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

SEMINOLE TRIBE OF FLORIDA
TRIBAL HISTORIC PRESERVATION OFFICE

TRIBAL HISTORIC
PRESERVATION OFFICE

SEMINOLE TRIBE OF FLORIDA
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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.

13 - 6

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

**STATE AGENCY
FEIS COMMENTS**



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.

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Mr. Bart Vernace, P.E.
 March 21, 2011
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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.] 7 - 3
- [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 avigation easements (page ES-108).] 4 - 1
- [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.] 7 - 5
- [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.] 7 - 6
- [Planned roadway projects in the vicinity of the project should be considered.] 17 - 3
- [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.] 7 - 7
- [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.] 12 - 4

[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

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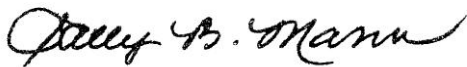
Mr. Bart Vernace, P.E.
March 21, 2011
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consistency with the FCMP, the concerns identified by the reviewing agencies must be addressed prior to project implementation. The state's continued concurrence will be based on the activity's compliance with 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.]

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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 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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Project Information	
Project:	FL201101275618C
Comments Due:	03/07/2011
Letter Due:	03/21/2011
Description:	FEDERAL AVIATION ADMINISTRATION - FINAL ENVIRONMENTAL IMPACT STATEMENT FOR PROPOSED AIRFIELD IMPROVEMENT PROJECT AT PALM BEACH INTERNATIONAL AIRPORT - WEST PALM BEACH, PALM BEACH COUNTY, FLORIDA.
Keywords:	FAA - FEIS, AIRFIELD IMPROVEMENT PROJECT AT PALM BEACH INTERNATIONAL AIRPORT
CFDA #:	20.106
Agency Comments:	
TREASURE COAST RPC - TREASURE COAST REGIONAL PLANNING COUNCIL	
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.	
PALM BEACH -	
No Comments	
TRANSPORTATION - FLORIDA DEPARTMENT OF TRANSPORTATION	
FDOT's Aviation Office has no comments. Military Trail, Southern Blvd, & 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 & 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., avigation 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&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&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 & coordination with FDOT D4 Maintenance Permits Office will be required.	
ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	
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.	
SOUTH FLORIDA WMD - SOUTH FLORIDA WATER MANAGEMENT DISTRICT	
The airport is covered under an existing Surface Water Management Permit. A modification to that permit will be necessary for the proposed new facilities.	

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Memorandum**Florida Department of
Environmental Protection**

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.

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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.

7 - 2

Memorandum
March 9, 2011
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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.]

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[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.]

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[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.]

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[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.]

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[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.]

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[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.]

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[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

26 - 54

Memorandum
March 9, 2011
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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.



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.

13 - 7

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, or at 850.245.6333.

Sincerely,

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

**LOCAL AGENCY
FEIS COMMENTS**



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. 1 - 102
 As a result, the FAA should not approve, conditionally or unconditionally, any short or long term components of the proposed airport expansion. 1 - 103
 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. 1 - 104

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. 23 - 6

"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.]

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[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.]

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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.]

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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:

1 - 111

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.

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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.

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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.

1 - 116

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.

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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.]

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[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.]

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[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.]

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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.

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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 PBI A 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 PBI A would be delayed by several decades. In addition, when, and if, PBI A 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 PBI A'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 PBI A 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 PBI A. 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 PBI A. 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 PBI A in the future would not then logically result in less planes being needed to serve the same number of passengers than before.

1 - 122

5. Flaws with the Future Demand versus Future Capacity Analysis for PBI A

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 PBI A 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 PBI A reaches the activity levels for Future Year 2 and Future 3, additional capacity should be provided in the form of a new runway.

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

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

Sources:

¹ PBIA ANOMS 2009; FAA's 2009 TAF, December 2009.

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

³ 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 Operations³	221,693 Operations³	238,457 Operations³
Weighted Average Hourly Capacity ¹	64	64	64
Rolling Peak Hour Demand ASV ²	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 ABD 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.

1 - 124

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.

1 - 125

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.]

2 - 55

[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.]

2 - 56

2 - 57

2 - 58

[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.]

2 - 59

2 - 60

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.

3 - 19

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 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 would occur on an east-west axis. This means that the proposed project would result in almost 100% of PBI'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's expansion proposal.

5 - 8

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.

5 - 9

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 PBIA 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 PBIA 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)

3 - 20

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.]

3 - 21

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.]

17 - 2

23 - 7

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.]

23 - 8

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

1 - 126

1 - 127

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.



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 Hazeltine National Drive, Suite 400
Orlando, FL 32822

VIA EMAIL (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 - 61
- 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 1 - 129
1 - 130

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.

2 - 62

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

n:\tgb\letters\2011\misc\vernace faa feis pbia.docx



Town of Glen Ridge RECEIVED FEB 0 2

1501 Glen Road • Glen Ridge, FL 33406

Phone: (561) 697-8868 • Facsimile: (561) 697-1755

E-mail: glenridgetownof@bellsouth.net

FL0003

March 1, 2011

U.S. Department of Transportation
Federal Aviation Administration
Attn: Bart Vernace, P.E.
Orlando Airports District Office
5950 Hazeltine National Dr., Suite 400
Orlando, FL 32822-5024

Re: Final Environmental Impact Statement (FEIS)
For Proposed Airfield Improvement Project
Palm Beach International Airport
Palm Beach County, FL

Dear Mr. Vernace:

[Thank you for supplying the Town of Glen Ridge with the Executive Summary of the FEIS. We do not have any input at this time, but we would like to be notified in the future should there be a decision to move forward on the proposed airfield improvement project again.]

29-15

Thank you in advance for your assistance.

Sincerely,

Michelle Suiter
Town Manager

cc: Town Council, Town Attorney MacGibbon

A Bird Sanctuary

PUBLIC
FEIS COMMENTS



Jrodjacc@aol.com
03/21/2011 11:49 PM

To pbia-eis@urscorp.com
cc kmarcus@pbcgov.org, svana@pbcgov.org,
pburdick@pbcgov.org, sabrams@pbcgov.org,
baaronson@pbcgov.org, jsantama@pbcgov.org,
ptaylor@pbcgov.org

bcc

Subject NO PBIA EXPANSION

Mr. Varnace,

I am taking the time to inform you that as concerned and engaged resident of Vedado I oppose the plans for PBIA expansion. It is unnecessary and unwarranted. The fact that there has been a downward trend in air traffic does not reflect the need for this expensive expansion. Your request to maintain the current EIS for future expansion plans is unprecedented. Is it even legal?

1 - 1

1 - 2

Noise levels, air traffic and age of historic homes will be different in five or ten years from now. Hypothetically, if I were to consult my doctor today about a procedure needed I would not want him to use labs from five years ago. They will be outdated and unreliable. Would you do it? Why would you want to do that to our neighborhoods?

1 - 3

No to the expansion and no to the defer plan to use the EIS later.

1 - 4

Joseph S. Accurso
3639 Paseo Andalusia
West Palm Beach, FL 33405



BlueJet941 <bluejet941@gmail.com>

03/21/2011 11:17 PM

To pbia-eis@urscorp.com

cc

bcc

Subject PBIA EIS Comment - CCAN

On Behalf of the Citizens' Committee on Airport Noise:

At the March 17, 2011 meeting of the Citizens' Committee on Airport Noise, a Palm Beach County Board of County Commissioners appointed committee [the CCAN was informed by PBIA administrative staff of their intent of the airport to move forward with selected components of the airport expansion approved by the EIS. Effectively, the cost of the runway expansion will be spread out into several smaller projects in order to make the major expansion project appear less costly. If PBIA is allowed to spend taxpayer money on the preparatory projects meant to pave the way for the runway expansion, adding the new runway will become a fate accompli and a full EIS will not be required.

1 - 5

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 (KPBI) decides to come back with a proposal to move forward with the runway expansion.

Respectfully Submitted,

A. Paul Agnew

Chairman Citizens' Committee on Airport Noise

Owner of:

941 Paseo Morella

West Palm Beach, FL 33418

561-889-6181



BlueJet941 <bluejet941@gmail.com>

03/21/2011 11:18 PM

To pbia-eis@urscorp.com

cc

bcc

Subject KPBI EIS Comments - Agnew

[This message is to express my dismay and deep concern over the findings in the PBIA EIS. In particular, I find it unconscionable and illogical to reach a conclusion that a new south parallel runway with a new arrival and departure corridor over the Historic Vedado/Hillcrest neighborhood will have no significant noise impact and no increase in atmospheric/sooting impacts. I summarily reject the findings that the noise will not increase as a self-serving conclusion that fails to take into account the fact that homes on the north side of Paseo Morella, south of and not directly under the flightpath, have already been found to require noise mitigation measures].

3 - 1

At the March 17, 2011 meeting of the Citizens' Committee on Airport Noise, a Palm Beach County Board of County Commissioners appointed committee, [the CCAN was informed by PBIA administrative staff of their intent of the airport to move forward with selected components of the airport expansion approved by the EIS. Effectively, the cost of the runway expansion will be spread out into several smaller projects in order to make the major expansion project appear less costly.

I expressed great concern that these selected projects are solely intended to support the future runway expansion and that, at some undetermined time in the future, the remaining expansion projects will be allowed to commence without the requirement for a new EIS. If PBIA is allowed to spend taxpayer money on the preparatory projects meant to pave the way for the runway expansion, adding the new runway will become a fait accompli and a full EIS will not be required.

1 - 6

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 (KPBI) decides to come back with a proposal to move forward with the runway expansion.

Finally, [there is growing question over the propriety of the hiring the PBIA EIS project manager from URS Corporation by the Federal Aviation Administration and charging him with the duties of collecting and categorizing the comments received from the public and local governments. An investigation should be required to bring all facts of this action out to the public].

26 - 2

Respectfully Submitted,

A. Paul Agnew - Chairman Citizens' Committee on Airport Noise
 Owner of:
 941 Paseo Morella
 West Palm Beach, FL 33418



"Carrie Bradburn" <carrie@martinsmotel.com>

03/21/2011 04:04 PM

To <pbia-eis@urscorp.com>

cc

bcc

Subject Airport expansion

To who is may concern

My names is Carrie Bradburn and my family and I live at 3033 Ridgeway Ave, West Palm Beach, FL 33405

We say no to the airport expansion. What a waste of money when there are a lot of other things the county tax dollars could go towards like our schools.

Sincerely,

Carrie Bradburn

1 - 7



Jonathan Burgess <burgess1417@hotmail.com>

03/21/2011 06:07 PM

To <pbia-eis@urscorp.com>

cc

bcc

Subject PBIA Expansion

To Whom it May Concern:

My name is Jonathan Burgess, and I live at 963 Allendale Road, West Palm Beach, Florida 33405.

I have significant concerns regarding the impacts of the proposed Palm Beach International Airport (PBIA) expansion project and request that the Federal Aviation Administration (FAA) deny the County Department of Airports' request of approval of this project through the Final Environmental Impact Statement (FEIS).

26 - 3

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 historically designated neighborhoods, as well as districts with significant numbers of minority populations.

23 - 1

I also continue 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 the FEIS, but is rather a reflection of a pattern of long term declining airplane activity over the last thirty years at PBIA caused by a multitude of factors.

1 - 8

Even though airplane activity decreased at PBIA for the last three decades at significant rates, the annual future activity forecasts generated by the FAA and by PBIA during that same period continually overestimated future activity at the airport and inaccurately predicted increases in airplane activity. Despite the lack of reliability of the airport activity forecasts, the FAA has indicated through the FEIS that future decisions on the proposed runway expansion at PBIA will be decided by continuing to rely on forecasts that use a methodology that for the last 30 years has continually overestimated future activity at PBIA.

1 - 9

For these reasons, I am against any unnecessary expansion of the Palm Beach International Airport.

1 - 10

Jonathan Burgess
963 Allendale Road, WPB, FL 33405



Quan Anh Cao <QCao009@aol.com>

03/20/2011 09:45 PM

To "pbia-eis@urscorp.com" <pbia-eis@urscorp.com>

cc

bcc

Subject Expansion

Gentlemen:

There are many reasons, academic, scientific, data-driven, fact-based, why we should NOT expand simply to make PBI bigger.

I have ONE that stands out for me as a frequent traveler who logs hundreds of thousands of miles year in, year out. I always choose PBI over FLL and MIA. The reason: it's size, it's accessibility and it's friendliness. You will lose that when you expand and you will lose the majority of us who come to Palm Beach and surroundings for that very reason.

26 - 4

Quan Cao

19910 Villa Lante Place
Boca Raton, FL 33434

561-866-7028

Sent from my iPad

The moment is now.

J Krishnamurti



"civil society@bellsouth.net"
<civilsociety@bellsouth.net>

03/21/2011 10:04 PM

To <pbia-eis@urscorp.com>

cc

bcc

Subject no to PBIA

There is nothing responsible about cramming an expansion down our throats when all the statistics bear out the truth that it is not needed.

1 - 11

NO EXPANSION!!!!!!

Melinda Clark
1507 Florida Ave
WPB, FL 33401

—



"Tom Conboy"
<tconboy@earthlink.net>

03/21/2011 10:44 PM

Please respond to
<tconboy@earthlink.net>

To <pbia-eis@urscorp.com>, <kmarcus@pbcgov.org>,
<svana@pbcgov.org>, <pburdick@pbcgov.org>,
<sabrams@pbcgov.org>, <baaronso@pbcgov.org>,
<jsantama@pbcgov.org>, <ptaylor@pbcgov.org>,
<Alcee.Hastings@mail.house.gov>,
<Bill_Nelson@nelson.senate.gov>,
<allen.west@mail.house.gov>,
<Tom.Rooney@mail.house.gov>,
<ted.deutch@mail.house.gov>
cc <Wendi.Lipsich@mail.house.gov>,
<jobeth.banas@mail.house.gov>,
<barbican3333@aol.com>

bcc

Subject Comments regarding the FEIS PBI Airport Expansion Project

Thomas V. Conboy, P.E.
Poinciana Park Neighborhood Association Vice President
924 Almeria Rd.
West Palm Beach, FL 33405

Mr. Bart Vernace, PE
Federal Aviation Administration
5950 Hazeltine National Drive
Suite 400
Orlando, FL 32822

March 21, 2011

Re: Comments regarding the FEIS PBI Airport Expansion Project

Dear Mr. Bart Vernace:

My name is Thomas Conboy and I have been a professional Engineer since 2003. Upon a detailed technical review of the Final Environmental Impact Statement for the expansion of Palm Beach International Airport (PBI), my professional assessment is that PBI has no capacity problems at this time. In fact, there has been a steady downward trend of airplane traffic at PBI since 1976. The purpose of the proposed expansion is to increase capacity at the airport and to handle more airplane traffic. The FAA should deny both conditionally and unconditionally the County Department of Airports' request for approval for this project through the Final Environmental Impact Statement (FEIS). 1 - 12 26 - 5

In the 2008 Draft EIS the FAA declared:

2.3 PROBLEM STATEMENT Based on the requested Federal action outlined in the preceding section of this DEIS, the FAA noted two conditions that affect the ability of PBI to efficiently accommodate future aviation demand. First, the existing airfield infrastructure and geometry contribute to congestion and delay during peak periods of aircraft operations. Second, the projected growth in aircraft operations at PBI over time would increase average annual delay to unacceptable levels as established by the FAA.

Last year (2010) PBI recorded the lowest number of airplane operations in the last 35 years of operation. Under these conditions the existing airfield infrastructure and geometry do not contribute to congestion and delay. Based upon the FAA's 2009 Terminal Area Forecast used in the Final EIS we will not even reach the 2006 airplane operations, which we started the study out with, prior to the year 2030. The projected growth in aircraft operations at PBI over time will not increase average annual delay to unacceptable levels as established by the FAA. Based upon these facts the Final EIS should recommend the No-Project Alternative. 1 - 13

The Following Chart shows the operation data at PBI since 1976:

The study Team is to be commended for the following determinations:

- Based on actual aircraft activity records and the FAA's 2009 TAF, the agency has determined that the level of aircraft activity at PBI **does not currently result in unacceptable levels of operational delay.**
- After the publication of the DEIS, and the review of comments on the DEIS, the **FAA determined that a more recent forecast of aviation activity that is representative of the changed conditions at PBI should be used for the FEIS.** Subsequently, the FAA decided that, barring a full-fledged Aviation Forecast Update Study by the Airport Sponsor, the agency's own 2009 Terminal Area Forecast (2009 TAF), would be the most applicable forecast of aviation activity for use in the FEIS (see [Section ES 3.1](#) of this Executive Summary and [Section 1.2.4](#) of the FEIS for details on the 2009 TAF).

However, since no modeling or Environmental Assessment of the alternatives was performed using the 2009 TAF, the FAA should update the study with the 2010 TAF which was published by the FAA prior to the release of this report and incorporate this data in all of the modeling analysis of the Impacts of the project.

In Chapter 1 the study goes on to state:

Based on the current level of aircraft operational activity at PBI and the FAA's 2009 TAF, the AIP will not be needed at PBI by the original 2013 implementation year identified in the September 2008 DEIS. For this FEIS, the implementation timeframe for the airport capacity enhancement component of the AIP (expansion of Runway 10R/28L) is based on a point in time when aircraft activity and delay levels at PBI are again anticipated to result in unacceptable levels of aircraft operational delay, thereby supporting the need for the expansion of Runway 10R/28L. **The FAA's 2009 TAF suggests that the same number of aircraft operations as were generated at PBI in 2006 may not be reached until 2030.** However, the FAA's TAF is updated on an annual basis and future TAF updates could possibly reflect a quicker recovery of aircraft operational activity at PBI. If this occurs, the justification for the capacity enhancement component of the AIP may be realized at a point in time sooner than anticipated based upon the 2009 TAF. [Chapter 2.0](#), Purpose and Need, of this FEIS presents a discussion of the anticipated implementation timeframe for the AIP.

It is good the study Team acknowledges that the TAF is only a forecast and may not predict the future accurately. It is interesting that the study team is concerned about the TAF erring on the side of not being optimistic enough. We have additional data, the newly published 2010 TAF which indicates that the 2009 TAF erred on being too optimistic. The 2010 TAF shows the 2030 projection is reduced an additional 5% or 10,118 operations in relation to the 2009 TAF. So using the more up to date 2010 TAF

actually predicts the airport will realize this justification later than anticipated in the study not sooner. The history of TAF's prepared for this airport have shown that the projections are always optimistic, not the other way around as this study is implying.]

The Section on Terminal Area Forecasts states:

ES 1.3.2 FAA 2009 TERMINAL AREA FORECAST

Since mid-2008, the ongoing economic recession has resulted in reductions in the FAA's forecasts of aviation activity for PBIA, as well as most airports in the national system.

Accordingly, the FAA's final 2009 TAF reflects this decrease in aviation activity that has occurred at PBIA after the release of the September 2008 DEIS. The 2009 TAF also indicates that aviation activity will continue to decline at PBIA through 2010, but that by 2011, aviation activity at PBIA will experience moderate, but steady growth. This projected increase of approximately +1.7 percent per year (varying over time) starting in 2011, is projected to continue through 2030, the last year for which the 2009 TAF provides forecast data. A summary of the actual 2009 operations and enplanements at PBIA, as well as the FAA's 2009 TAF is provided in [Table ES-2](#).

[The EIS does not discuss the assumed accuracy of Terminal Area Forecasts. It should be pointed out that even though there is a 35 year trend of actual data showing a drop of operations of 1.7 percent per year the FAA has never projected sustained drops in growth at PBIA. If the study were to evaluate the history of PBIA TAF's dating back to 2006 and greater they would find that the FAA on average projects a 1.7 percent growth rate for PBIA even though the actual data continues to decline at a rate of 1.7%.]

1 - 16

The EIS introduces imaginary "Future Years" in Table ES-3:

The 2008 Record of Decision for The Development And Expansion Of Runway 9r/27l And Other Associated Airport Projects At Fort Lauderdale-Hollywood International Airport Broward County, Florida states:

The FAA standard for determining projected forecast consistency defines acceptable when a forecast is within 10 percent (+/-) for the five-year projection. For forecast projections within the 10-year and beyond, a 15 percent (+/-) difference is considered consistent with the FAA's TAF. (FAA Order 5100.38C *Airport Improvement Program Handbook* , paragraph 428.a. *Aviation Forecasting* .)

[If Imaginary "Future Year 2" or Imaginary "Future Year 3" is reached prior to 2028 the data will be outside of the cone of forecast consistency. If the data is outside of the cone of forecast consistency all of the assumptions in regard to plane operations for model input in the Airport and Airspace Simulation Model (SIMMOD), the Emissions & Dispersion Modeling System (EDMS), Mobile Source Emission Model, and the Integrated Noise Model (INM) are suspect and not appropriate.] A term know to modelers around the world is "Garbage in = Garbage out". [If the model input is not valid the output is not either. There are too many model input parameters to list that would drive up wait times at the airport but plane mix seems to be what the study uses to justify a drop in the Annual Service Volume (ASV) of 16% between Imaginary "Future Year 2" and Imaginary "Future Year 3".] [In regards to ASV the study failed to address my comment made on November 24th 2008:

1 - 17

1 - 18

1 - 139

"The assumption that the Annual Service Volume (ASV) will go down in 2018 based on an increased use of larger sized commercial aircraft is opposite of the assumption made in the Palm Beach International Airport Forecast Study, CH2M Hill, December 2005 which assumed that the use of smaller commercial

planes would increase and larger commercial planes would decrease.”

The study referred the reader to comment 1-134 which then goes on to refer the reader to 1-115.

1-115 Comment

The claim that there is “increased propensity for air travel to PBC” is not based on factual data as is not valid. As explained in more detail later in this document, air travel to PBC has been decreasing for the last few decades, with the current aviation activity at PBIA being the lowest for at least the last thirty years.

Response

As a result of the 2009 TAF for PBIA, the Airport Sponsor deemed it necessary to re-evaluate the implementation plan and schedule for the AIP at PBIA. 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. However, the FAA acknowledges that these conditions may change over time. Therefore, the FAA will reassess them when a decision on the Long-Term components of the AIP or Alternative 2 is ripe to move forward and the FAA will be in a position to provide updated responses. The FAA and/or the Airport Sponsor will undertake the appropriate additional NEPA processing for the Long-Term components of the AIP when the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay.

No where does this address the conflicting assumptions of plane mix. If the FAA will address this at a later time they should not change the ASV in the FEIS in Imaginary “Future Year 3”. Furthermore the FAA should revisit the assumed plane mix which contradicts with the Palm Beach International Airport Forecast Study, CH2M Hill, December 2005 for the Imaginary “Future Years” modeled in the Airport and Airspace Simulation Model (SIMMOD).

1 - 98

If by some fluke an unexpected change occurs and the actual operations at PBIA reach imaginary “Future Year 1” operations of 204,054 prior to the year 2022 the forecast consistency would be unacceptable (greater than 15%) which would bring into question the entire EIS and the Record of Decision opening it up for legal challenge. If however PBIA reaches the imaginary “Future Year 1” operations of 204,054 after the year 2023 then the EIS would be out of date, again this would bring into question the entire EIS and the Record of Decision opening it up for legal challenge. This **2.6 million dollar** study has provided no resolution and will **drag out legal battles and legal costs** for the County and the Citizens of Palm Beach County.

1 - 19

1 - 99

The EIS analysis of the alternatives is **technically flawed**. To evaluate the alternatives the FAA should only use data points within the domain of the 2009 or 2010 TAF. Using imaginary Future Years which have no basis other than that they were the projected years 2013 and 2018 in the 2005 CH2M Hill Projections is not technically sound. The 2005 CH2M Hill Projections have been proven to be entirely inadequate based on actual data.

2 - 1

According to Bart Vernace, P.E. FAA’s PBIA EIS Study Manager, the FAA has never before issued a conditional approval in an EIS. This is unprecedented and creates a precedent for future EIS evaluations. The precedent set is that a projected moderate upward trend in the TAF evaluations (which is counter to the actual data) can be used to justify evaluating proposed alternatives based upon some imaginary “Future Year” and get unconditional approval for parts of the project and conditional approval for other parts of the project. This is an **abuse** of the Federal Environmental Impact Statement evaluation process.

26 - 7

The FAA needs to use data points that are within the TAF to evaluate the alternatives. Using imaginary data points that are outside of the domain of the TAF and outside of the acceptable forecast consistency range and which predetermines the outcome of the Alternatives analysis is **misleading and deceptive**.

26 - 8

[The EIS is **ambiguous and unclear** on when the County should come back to receive approval for the portions of the project that are conditionally approved.] The Study states: 26 - 9

In 2009, the demand as a percent of ASV was below the planning threshold of 60 to 75 percent of ASV. However, when the number of aircraft operations at PBI reach the planning threshold of 60 to 75 percent of ASV, it would be prudent for the Airport Sponsor to re-initiate activities that would address capacity shortfalls at PBI resulting from its runway configuration.

But then the study goes on to state:

Based on the data presented above in **Sections ES 2.5.1** and **ES 2.5.2**, future increases in aircraft operations, in conjunction with PBI's existing runway configuration capacity limitations, would generate unacceptable levels of operational delay at PBI when aircraft operational levels reach approximately 200,000 operations.

But [the whole analysis seems to point to when the actual operations reach imaginary "Future Year 1" and forecasts project reaching imaginary "Future Year 2" and imaginary "Future Year 3". Does the approval process for the Conditional portions of the process begin when the ASV magically goes down in imaginary "Future Year 3" and the present levels of activity would put us over the threshold of 132,623 operations which is 60 percent of the Imaginary "Future Year 3" ASV? Is the ASV drop still in 2018 or is it some imaginary year yet to be determined? Is the activity the 158,066 operations, which is 60 percent of the existing ASV? Is it when we reach 200,000 operations? Or is it when we reach 204,054 operations?] 1 - 20

[The EIS is also ambiguous on the level of environmental studies needed to get unconditional approval of the conditional portion of the project. Since an EIS is only good for 5 years based upon changing conditions and data that is outdated and no longer relevant the EIS should state this and make it clear that if PBI does not reach this condition within 5 years a new Full EIS would need to be conducted.] 26 - 10

[This study is technically flawed due to use of Imaginary "Future Years" to evaluate the alternatives which are outside of the domain of the 2009 TAF and its cone of forecast consistency.] It is misleading and deceptive in that it acknowledges that there are no problems at this time or in the next 19 years, but it goes on to select an alternative and give conditional approval of that alternative. [This study is a waste of 2.6 million dollars in public funds, which is leading us towards wasting between 370 million to 730 million dollars of public funds. The FAA should do the right thing and deny both conditionally and unconditionally the County Department of Airports' request of approval for this project through the Final Environmental Impact Statement (FEIS).] 1 - 21
1 - 22
26 - 11

Sincerely,

Thomas V. Conboy, P.E.
Vice President
Poinciana Park Neighborhood Association



Comments on FEIS.docx

Thomas V. Conboy, P.E.
Poinciana Park Neighborhood Association Vice President
924 Almeria Rd.
West Palm Beach, FL 33405

Mr. Bart Vernace, PE
Federal Aviation Administration
5950 Hazeltine National Drive
Suite 400
Orlando, FL 32822

March 21, 2011

Re: Comments regarding the FEIS PBI Airport Expansion Project

Dear Mr. Bart Vernace:

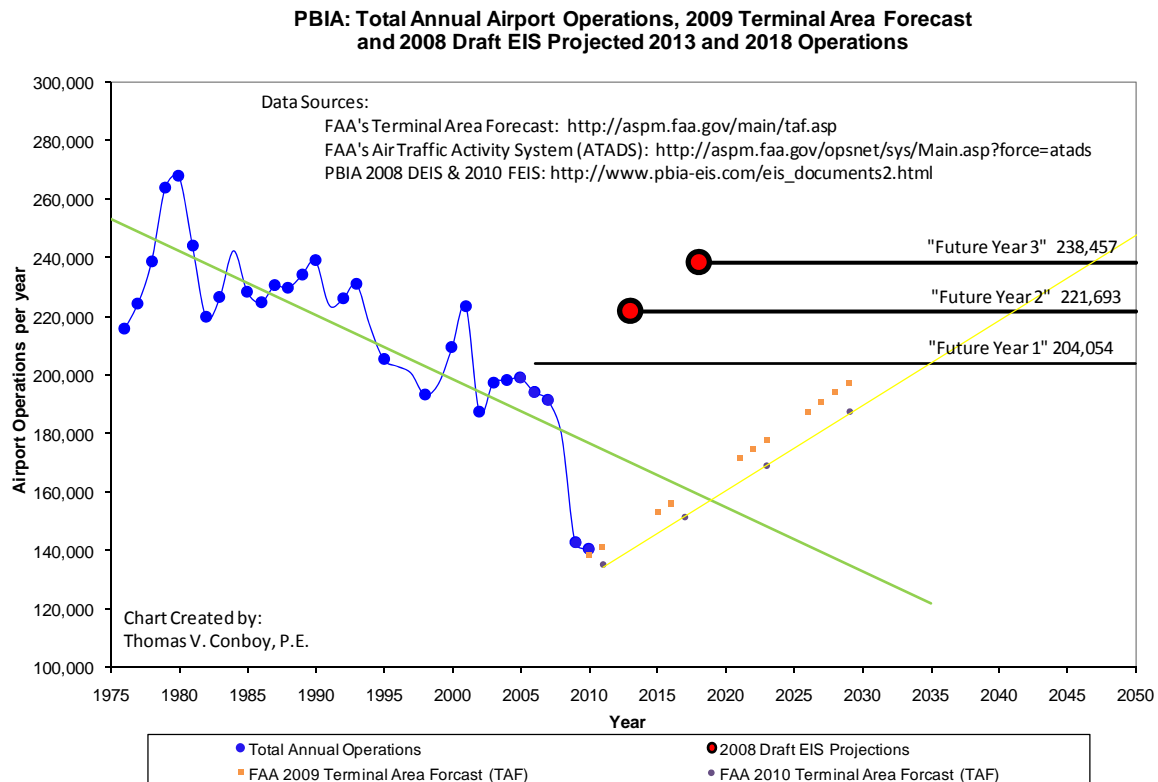
My name I Thomas Conboy and I have been a professional Engineer since 2003 Upon a detailed technical review of the Final Environmental Impact Statement for the expansion of Palm Beach International Airport (PBIA), my professional assessment is that PBIA has no capacity problems at this time. In fact there has been a steady downward trend of airplane traffic at PBIA since 1976. The purpose of the proposed expansion is to increase capacity at the airport and to handle more airplane traffic. The FAA should deny both conditionally and unconditionally the County Department of Airports' request approval for this project through the Final Environmental Impact Statement (FEIS).

In the 2008 Draft EIS the FAA declared:

2.3 PROBLEM STATEMENT Based on the requested Federal action outlined in the preceding section of this DEIS, the FAA noted two conditions that affect the ability of PBIA to efficiently accommodate future aviation demand. First, the existing airfield infrastructure and geometry contribute to congestion and delay during peak periods of aircraft operations. Second, the projected growth in aircraft operations at PBIA over time would increase average annual delay to unacceptable levels as established by the FAA.

Last year (2010) PBIA recorded the lowest number of airplane operations in the last 35 years of operation. Under these conditions the existing airfield infrastructure and geometry **do not** contribute to congestion and delay. Based upon the FAA's 2009 Terminal Area Forecast used in the Final EIS we will not even reach the 2006 airplane operations, which we started the study out with, prior to the year 2030. The projected growth in aircraft operations at PBIA over time **will not** increase average annual delay to unacceptable levels as established by the FAA. Based upon these facts the Final EIS should recommend the No-Project Alternative.

The Following Chart shows the operation data at PBI since 1976:



The study Team is to be commended for the following determinations:

- Based on actual aircraft activity records and the FAA's 2009 TAF, the agency has determined that the level of aircraft activity at PBI **does not currently result in unacceptable levels of operational delay.**
- After the publication of the DEIS, and the review of comments on the DEIS, the **FAA determined that a more recent forecast of aviation activity that is representative of the changed conditions at PBI should be used for the FEIS.** Subsequently, the FAA decided that, barring a full-fledged Aviation Forecast Update Study by the Airport Sponsor, the agency's own 2009 Terminal Area Forecast (2009 TAF), would be the most applicable forecast of aviation activity for use in the FEIS (see [Section ES 3.1](#) of this Executive Summary and [Section 1.2.4](#) of the FEIS for details on the 2009 TAF).

However since no modeling or Environmental Assessment of the alternatives was performed using the 2009 TAF, the FAA should update the study with the 2010 TAF which was published by the FAA prior to the release of this report and incorporate this data in all of the modeling analysis of the Impacts of the project.

In Chapter 1 the study goes on to state:

Based on the current level of aircraft operational activity at PBI and the FAA's 2009 TAF, the AIP will not be needed at PBI by the original 2013 implementation year identified in the September 2008 DEIS. For

this FEIS, the implementation timeframe for the airport capacity enhancement component of the AIP (expansion of Runway 10R/28L) is based on a point in time when aircraft activity and delay levels at PBIA are again anticipated to result in unacceptable levels of aircraft operational delay, thereby supporting the need for the expansion of Runway 10R/28L. **The FAA's 2009 TAF suggests that the same number of aircraft operations as were generated at PBIA in 2006 may not be reached until 2030.** However, the FAA's TAF is updated on an annual basis and future TAF updates could possibly reflect a quicker recovery of aircraft operational activity at PBIA. If this occurs, the justification for the capacity enhancement component of the AIP may be realized at a point in time sooner than anticipated based upon the 2009 TAF. [Chapter 2.0](#), Purpose and Need, of this FEIS presents a discussion of the anticipated implementation timeframe for the AIP.

It is good the study Team acknowledges that the TAF is only a forecast and may not predict the future accurately. It is interesting that the study team is concerned about the TAF erring on the side of not being optimistic enough. We have additional data, the newly published 2010 TAF which indicates that the 2009 TAF erred on being too optimistic. The 2010 TAF shows the 2030 projection is reduced an additional 5% or 10,118 operations in relation to the 2009 TAF. So using the more up to date 2010 TAF actually predicts the airport will realize this justification later than anticipated in the study not sooner. The history of TAF's prepared for this airport have shown that the projections are always optimistic, not the other way around as this study is implying.

The Section on Terminal Area Forecasts states:

ES 1.3.2 FAA 2009 TERMINAL AREA FORECAST

Since mid-2008, the ongoing economic recession has resulted in reductions in the FAA's forecasts of aviation activity for PBIA, as well as most airports in the national system. Accordingly, the FAA's final 2009 TAF reflects this decrease in aviation activity that has occurred at PBIA after the release of the September 2008 DEIS. The 2009 TAF also indicates that aviation activity will continue to decline at PBIA through 2010, but that by 2011, aviation activity at PBIA will experience moderate, but steady growth. This projected increase of approximately +1.7 percent per year (varying over time) starting in 2011, is projected to continue through 2030, the last year for which the 2009 TAF provides forecast data. A summary of the actual 2009 operations and enplanements at PBIA, as well as the FAA's 2009 TAF is provided in [Table ES-2](#).

The EIS does not discuss the assumed accuracy of Terminal Area Forecasts. It should be pointed out that even though there is a 35 year trend of actual data showing a drop of operations of 1.7 percent per year the FAA has never projected sustained drops in growth at PBIA. If the study were to evaluate the history of PBIA TAF's dating back to 2006 and greater they would find that the FAA on average projects a 1.7 percent growth rate for PBIA even though the actual data continues to decline at a rate of 1.7%.

The EIS introduces imaginary “Future Years” in Table ES-3:

**TABLE ES-3
ASV VS. AIRCRAFT OPERATIONAL DEMAND
PBIA EXISTING AIRFIELD CONFIGURATION**

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

Sources: ¹ PBIA ANOMS 2009; FAA's 2009 TAF, December 2009.

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

³ 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.

Updated by URS Corporation, 2010.

The 2008 Record of Decision for The Development And Expansion Of Runway 9r/27l And Other Associated Airport Projects At Fort Lauderdale-Hollywood International Airport Broward County, Florida states:

The FAA standard for determining projected forecast consistency defines acceptable when a forecast is within 10 percent (+/-) for the five-year projection. For forecast projections within the 10-year and beyond, a 15 percent (+/-) difference is considered consistent with the FAA's TAF. (FAA Order 5100.38C *Airport Improvement Program Handbook*, paragraph 428.a. *Aviation Forecasting*.)

If Imaginary “Future Year 2” or Imaginary “Future Year 3” is reached prior to 2028 the data will be outside of the cone of forecast consistency. If the data is outside of the cone of forecast consistency all of the assumptions in regard to plane operations for model input in the Airport and Airspace Simulation Model (SIMMOD), the Emissions & Dispersion Modeling System (EDMS), Mobile Source Emission Model, and the Integrated Noise Model (INM) are suspect and not appropriate. A term known to modelers around the world is “Garbage in = Garbage out”. If the model input is not valid the output is not either. There are too many model input parameters to list that would drive up wait times at the airport but plane mix seems to be what the study uses to justify a drop in the Annual Service Volume (ASV) of 16% between Imaginary “Future Year 2” and Imaginary “Future Year 3”. In regards to ASV the study failed to address my comment made on November 24th 2008:

“The assumption that the Annual Service Volume (ASV) will go down in 2018 based on an increased use of larger sized commercial aircraft is opposite of the assumption made in the Palm Beach International Airport Forecast Study, CH2M Hill, December 2005 which assumed that the use of smaller commercial planes would increase and larger commercial planes would decrease.”

The study referred the reader to comment 1-134 which then goes on to refer the reader to 1-115.

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The claim that there is “increased propensity for air travel to PBC” is not based on factual data as is not valid. As explained in more detail later in this document, air travel to PBC has been decreasing for the last few decades, with the current aviation activity at PBIA being the lowest for at least the last thirty years.

Response

As a result of the 2009 TAF for PBIA, the Airport Sponsor deemed it necessary to re-evaluate the implementation plan and schedule for the AIP at PBIA. 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. However, the FAA acknowledges that these conditions may change over time. Therefore, the FAA will reassess them when a decision on the Long-Term components of the AIP or Alternative 2 is ripe to move forward and the FAA will be in a position to provide updated responses. The FAA and/or the Airport Sponsor will undertake the appropriate additional NEPA processing for the Long-Term components of the AIP when the number of aircraft operations at PBI returns to the levels that would cause unacceptable aircraft operational delay.

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The EIS analysis of the alternatives is **technically flawed**. To evaluate the alternatives the FAA should only use data points within the domain of the 2009 or 2010 TAF. Using imaginary Future Years which have no basis other than that they were the projected years 2013 and 2018 in the 2005 CH2M Hill Projections is not technically sound. The 2005 CH2M Hill Projections have been proven to be entirely inadequate based on actual data.

According to Bart Vernace, P.E. FAA’s PBI EIS Study Manager, the FAA has never before issued a conditional approval in an EIS. This is unprecedented and creates a precedent for future EIS evaluations. The precedent set is that a projected moderate upward trend in the TAF evaluations (which is counter to the actual data) can be used to justify evaluating proposed alternatives based upon some imaginary “Future Year” and get unconditional approval for parts of the project and conditional approval for other parts of the project. This is an **abuse** of the Federal Environmental Impact Statement evaluation process.

The FAA needs to use data points that are within the TAF to evaluate the alternatives. Using imaginary data points that are outside of the domain of the TAF and outside of the acceptable forecast consistency range and which predetermines the outcome of the Alternatives analysis is **misleading and deceptive**.

The EIS is **ambiguous and unclear** on when the County should come back to receive approval for the portions of the project that are conditionally approved. The Study states:

In 2009, the demand as a percent of ASV was below the planning threshold of 60 to 75 percent of ASV. However, when the number of aircraft operations at PBI reach the planning threshold of 60 to 75 percent of ASV, it would be prudent for the Airport Sponsor to re-initiate activities that would address capacity shortfalls at PBI resulting from its runway configuration.

But then the study goes on to state:

Based on the data presented above in [Sections ES 2.5.1](#) and [ES 2.5.2](#), future increases in aircraft operations, in conjunction with PBIA's existing runway configuration capacity limitations, would generate unacceptable levels of operational delay at PBIA when aircraft operational levels reach approximately 200,000 operations.

But the whole analysis seems to point to when the actual operations reach imaginary "Future Year 1" and forecasts project reaching imaginary "Future Year 2" and imaginary "Future Year3". Does the approval process for the Conditional portions of the process begin when the ASV magically goes down in imaginary "Future Year 3" and the present levels of activity would put us over the threshold of 132,623 operations which is 60 percent of the Imaginary "Future Year 3" ASV? Is the ASV drop still in 2018 or is it some imaginary year yet to be determined? Is the activity the 158,066 operations, which is 60 percent of the existing ASV? Is it when we reach 200,000 operations? Or is it when we reach 204,054 operations? The EIS is also ambiguous on the level of environmental studies needed to get unconditional approval of the conditional portion of the project. Since an EIS is only good for 5 years based upon changing conditions and data that is outdated and no longer relevant the EIS should state this and make it clear that if PBIA does not reach this condition within 5 years a new Full EIS would need to be conducted.

This study is technically flawed due to use of Imaginary "Future Years" to evaluate the alternatives which are outside of the domain of the 2009 TAF and its cone of forecast consistency. It is misleading and deceptive in that it acknowledges that there are no problems at this time or in the next 19 years, but it goes on to select an alternative and give conditional approval of that alternative. This study is a waste of 2.6 million dollars in public funds, which is leading us towards wasting between 370 million to 730 million dollars of public funds. The FAA should do the right thing and deny both conditionally and unconditionally the County Department of Airports' request of approval for this project through the Final Environmental Impact Statement (FEIS).

Sincerely,

Thomas V. Conboy, P.E.
Vice President
Poinciana Park Neighborhood Association



"badkidsam" <badkidsam@att.net>

03/20/2011 01:17 PM

To <pbia-eis@urscorp.com>, <kmarcus@pbcgov.org>, <svana@pbcgov.org>, <pburdick@pbcgov.org>, <sabrams@pbcgov.org>, <baaronso@pbcgov.org>, <jsantama@pbcgov.org>, <ptaylor@pbcgov.org>, <bailey@southlandpark.org>

cc

bcc

Subject extension de el pbia

Despues de hablar con Jose Rodrigues, quien me informo de la posible expansion de el de el aeropuerto pbia. Muchos residentes que hablan espanol no han sido informados de este posible acto. POR FAVOR NO EXPANDANEL AEROPUERTO SIN ANTES INFORMAL Y TENER EN CUENTAS A TODOS LOS RESIDENTES AFECTADOS.

Carlos diaz 945 paseo castalla, wpb, Fl.

29 - 1

Please see second page of this PDF for an Engllish translation of the comments made in this email.

Comments received in an email (dated 3/20/2011 at 1:17 PM) from Carlos Diaz (badkidsam@att.net) on the Palm Beach International Airport FEIS. Comments translated from Spanish to English by URS Corporation.

Translated comment:

After speaking to Jose Rodriguez, who informed of the potential expansion of PBIA. [Many residents who speak Spanish have not been informed of this project. PLEASE DO NOT EXPAND THE AIRPORT WITHOUT INFORMING AND HAVING IN MIND ALL AFFECTED RESIDENTS.] 29 - 1

Carlos Diaz, 945 Paseo Castalla, WPB, FL



robert foot <bobfoots@att.net>

03/21/2011 03:38 PM

To pbia-eis@urscorp.com

cc bob foot <bobfoots@att.net>

bcc

Subject Palm Beach International Airport Airfield Improvement Project
Environmental Impact Statement

Good afternoon Mr. Vernace,

As a parishioner of Holy Spirit Episcopal Church, located at 1003 Allendale Rd., West Palm Beach FL 33405, speaking for myself, Robert L. Foot, and my wife, Virginia W. Foot, whose home is at 760 E. Ocean Ave., Apt. 507N, Boynton Beach FL 33435-5169,

I protest the consideration of expanding PBIA at this time. The statistics of the past have not been borne out as I understand the situation and the projections for the future do not appear realistic. At the church, we have been bothered in the past with the noise of planes taking-off and certainly do not want an expansion that might bring more flights over our church. And for the neighborhood from which many of our parishioners have come, it does not need additional activity bringing more noise or other environmental disturbances.

1 - 23

3 - 2

Sincerely,

Robert L. Foot

Virginia W. Foot

760 E. Ocean Ave., Apt. 507N

Boynton Beach, FL 33435-5169



"Goldstein, Joe (BBA USHQ)"
<joe.goldstein@us.bbaaviation.com>

03/08/2011 10:43 AM

To "pbia-eis@urscorp.com" <pbia-eis@urscorp.com>

cc

bcc

Subject PBI EIS

Dear Sir or Madam

As I understand the time line, the public comment period expires 3/21/11.

29 - 2

Do you anticipate that the deadline will be extended, or is it a firm expiration date? Your assistance in answering this question would be helpful.

If you would like me to call you, please forward your telephone number.

Thank you in advance for your corporation.

Joe Goldstein
407 648-7233

This message may contain confidential and/or privileged information. If you are not the intended recipient or believe you have received this message in error, please notify us immediately by responding to the sender and then delete this message from your system.

Please consider the environment before printing this email.



Bailey Gray <bailey.gray@pixelandpica.com>

03/09/2011 04:39 PM

To pbia-eis@urscorp.com

cc

bcc

Subject Comment on Final EIS

This comment is in reference to recently released FEIS for the Palm Beach International Airport and should be added to the comments section of the FEIS and addressed/responded to by the FAA prior to the Record of Final Decision.

CONTEXT is everything.

Several times throughout the FEIS, the phrase "recent economic downturn" (or a variation thereof) was used to justify the reversal in the Airport Sponsor's request to expand the airfield with a new CSPR. Exhibit: ES 1.2 "... a nationwide economic recession has resulted in a decrease in aviation activity at PBIA..."

1 - 24

No one would dispute the validity of that statement ON IT'S OWN MERITS. The recession has impacted every business, household and individual.

However, if you review the overall operations of the airfield over the past 35 years (see chart below), you will note that the airfield has not suffered ONLY as a result of the "recent economic downturn" but rather has been in a continual decline in operations FOR DECADES (green trend line).

Using the phrase "recent economic downturn" to justify the reversal implies that the long term trend in declining airport operations is a temporary blip, when in fact, IT IS NOT. Statistically, factually, and truthfully, it is not!

Using that phrase also implies that once the recession has ended, the airport sponsor will again be justified in its request for the CSPR. It is not. If the airport didn't need expansion with operations TWICE (1980) that of 2009, then it does not need expansion.

1 - 25

Using this language in the FEIS is misleading at best; a deliberate attempt to hide the long term truth at worst.

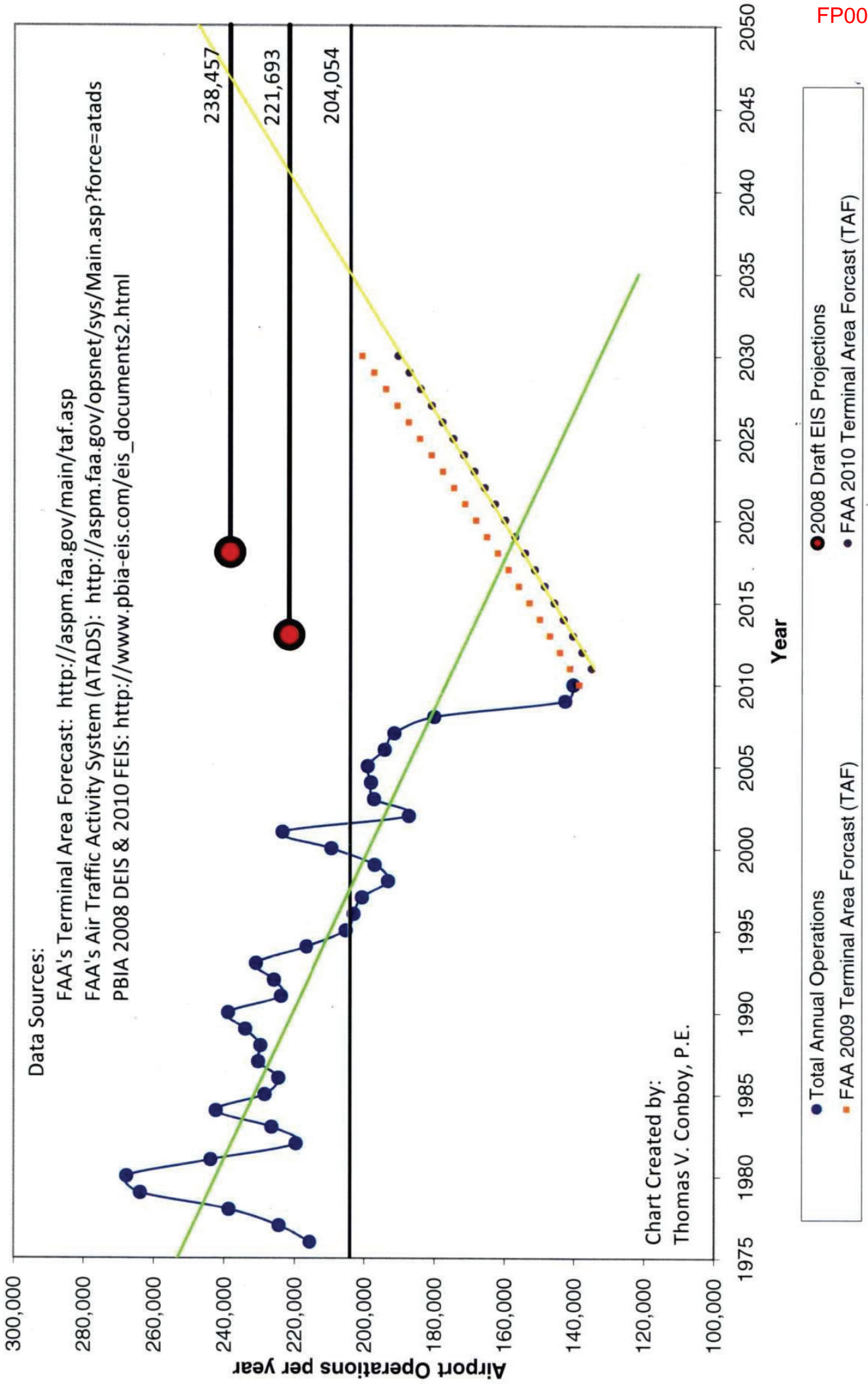
This language needs to be corrected/removed prior to the Record of Final Decision is issued by the FAA. The fact is that the Airport Sponsor was asking for something all along that wasn't justified or warranted. The recession is irrelevant.

Bailey Gray
135 Greenwood Drive
West Palm Beach, FL 33405



projection.JPG

PBIA: Total Annual Airport Operations, 2009 Terminal Area Forecast and 2008 Draft EIS Projected 2013 and 2018 Operations





Bailey Gray <bailey.gray@pixelandpica.com>

03/17/2011 04:05 PM

To pbia-eis@urscorp.com

cc

bcc

Subject PBIA FEIS Comment

Please include the following comments into the FEIS for PBIA.

Has the FAA EVER produced an FEIS with two stages (near-term and long-term)? How can it be justified to give conditional approval for a runway 20 years from now? Permitting near-term expansion that will ultimately lead to the long-term expansion project originally sought by the airport sponsor is outside the FAA's scope for this EIS as it was contracted.

26 - 12

26 - 13

It is not permissible to conduct an EIS in 2011 to support an expansion in 2030. The number of lawsuits against the County and FAA will be enormous based upon this flawed premise. At what point does an EIS become "stale" or expire? How much of the data contained in an EIS must change before it is deemed inaccurate. Based on the way this current FEIS is written, apparently 20 years is acceptable.

26 - 14

26 - 15

Furthermore, this piecemeal approach actually will exacerbate the operating conditions at PBIA. All the near-term projects are primarily to benefit GA traffic (i.e. addition of new facilities, expansion of GA taxiways, etc.). This will just encourage MORE GA traffic to an airport that already has too much GA traffic. This increased traffic will in time cause increased delays in take-off times, which will then further justify the need for future runway expansion. It's creating the problem instead of resolving it.

1 - 26

ANY GA improvements need to be done at the GA reliever airport; the one that was created specifically to pull GA traffic away from PBIA. The airport sponsor (the county commissioners: Karen Marcus, Shelly Vana, Paulette Burdick, Steven Abrams, Burt Aaronson, Jess Sanamaria, and Patricia Taylor) need to spend less money "expanding" PBIA and grow the GA traffic capacity at North County Reliever Airport. That's why county money was used to build the reliever airport in the first place. Plus improvements at that facility would be much less expensive to implement versus PBIA. PBIA has the public perception of being a commercial airport. But it's not. It's a GA airport with a little commercial thrown in. It's completely the opposite of all other airports in the country and this needs to be corrected.

1 - 27

Finally, why no public outreach surround the FEIS? Throughout the entire EIS process, there have been focus-groups, meetings, educational events to get public participation and education. The FEIS was released on 2/4/11 to the public. NO PUBLIC OUTREACH WAS CONDUCTED beyond bare minimum law requirements. Why the abrupt change? Especially given the novelty of the FEIS as written?

29 - 3

And why was it a full month later (3/9/11) that the Spanish translation was finally released? A large number of people directly impacted by the results of this FEIS are of hispanic origin. Is this vital information that will impact their homes and lives not important enough to the FAA to provide this population segment with the same amount of comment time as the english speakers being affected?

29 - 4

Sincerely,

Bailey Gray
135 Greenwood Drive
West Palm Beach, FL 33405



jdlsb <jdlsb@bellsouth.net>
03/04/2011 10:55 AM

To pbia-eis@urscorp.com
cc
bcc
Subject PBIA Expansion

Name: Donna Hall
Organization: Resident in Poinciana Park
Address: 941 Allendale Rd., West Palm Beach, Fl. 33405

Comments:

[A]lthough I have no problems per say with PBIA expanding when growth is accurately noted in real numbers, not projections, I have difficulty agreeing to an expansion using my tax dollars, be they local or federal, when actual airport usage has decreased since the 1980's. [A]lso, in addition to the decrease in usage, [c]ontinuing problems such as noise pollution, damages to homes due to flight patterns would only increase if enlargement of the airport occurs. [I] Therefore, [I] request that PBIA not be enlarged until actual numbers show a significant increase in usage. After all, we have 2 other large airports within a 50 mile radius. []

1 - 28
3 - 3
1 - 29



"John Inglis" <john.inglis@comcast.net>

03/20/2011 08:18 PM

To <pbia-eis@urscorp.com>

cc

bcc

Subject Airport Expansion

To Whom it May Concern:

My name is John Inglis. My address is 920 Andrews Road, West Palm Beach, Florida, 33405.

I grew up on the now defunct 900 block of Ridgewood Drive (33405) that was bought out in the early 1990s by the Airport. I have noticed a reduction in air traffic and noise from when I was younger and was not surprised to see that airport traffic has actually decreased.

[The two imaginary years of traffic levels projected in the DEIS were proved by actual data to be wrong, and which are significantly greater than anything in the domain of the 2009 or 2010 Terminal Area Forecast (TAF), using this as a basis to evaluate the proposed alternatives is fundamentally unsound, misleading, and an abomination of the EIS process.]

1 - 30

[Trying to create an "economic engine" in an age when we are short of funds is inexcusable. How can you justify your actions? Putting money toward this unnecessarily proved project is putting us in further debt. That "us", meaning US, is the entire nation. When many communities do these pork barrel projects, it costs us all.]

26 - 16

Stop the madness. Please, if you have to spend allotted money, use it where it can do some good, not in a bogus attempt to dupe honest, tax-paying citizens.]

John E. Inglis



"Mary Inglis" <inglis_m@firm.edu>

03/20/2011 05:01 PM

Please respond to
<inglis_m@firm.edu>

To <pbia-eis@urscorp.com>

cc

bcc

Subject Airport expansion

To Whom it May Concern:

My name is Mary Yoakley Inglis, and my address is 920 Andrews Road, West Palm Beach, Florida, 33405.

[Since two imaginary years of traffic levels projected in the DEIS were proved by actual data to be wrong, and which are significantly greater than anything in the domain of the 2009 or 2010 Terminal Area Forecast (TAF), using this as a basis to evaluate the proposed alternatives is fundamentally unsound, misleading, and an abomination of the EIS process.]

1 - 30

[In an age where accountability is key, how can you justify your actions? Putting money toward this unnecessarily proved project is like condemning an innocent man to prison. You know it's unjustified, and wrong, but you do it anyway?]

26 - 16

I am an English teacher, and I have my students read Machiavelli for these very reasons: the abuse of power and money. [Please, if you have to spend allotted money, use it where it can do some good, not in a bogus attempt to dupe honest, tax-paying citizens.]

26 - 17

Mary Yoakley Inglis



Melodie Janis <mjbelles@aol.com>

03/21/2011 06:16 PM

To pbia-eis@urscorp.com

cc Jrodjacc@aol.com

bcc

Subject PBIA Airport Expansion Stopped

To Everyone This Concerns:

I am Melodie Janis and I live at 1115 Magnolia St., WPB, FL 33405, in the Hillcrest neighborhood (now Vedado/Hillcrest). I bought my home in 1988 and was fully aware of my proximity to the airport. I diligently stay aware of any and all changes in my neighborhood, such as plans for the buyout area, prior changes to I-95, and especially plans for the airport. Over the years the noise has increased and more often than ever planes fly almost right over my house, actually scarring me and making me wonder when a bad event will occur. I don't dwell on this, partly because I am spending more and more time cleaning the greasy dirt out of my pool which is almost no pleasure to make use of anymore, and washing the greasy black dirty stuff off my pavers around my pool and sidewalks. It was not like this when I moved in.

3 - 4

5 - 1

I follow the discussions and meetings and read the surveys and studies. I know airport usage has been declining and previous studies no longer support any expansion of the airport. I understand that if there was a good reason to build a new runway (and there is not!) that it would be closer to Southern Blvd. and the planes would fly exactly over my home on Magnolia Street (I measured it out based on the specific details provided a year or so ago). This would necessitate the buyout of all the homes remaining in my neighborhood (especially my block) and destroy the historically designated neighborhood of Vedado.

23 - 2

It was recently written in the Palm Beach Post that the newest information revealing the reduction in air flights supported not only halting the process of PBIA expansion indefinitely but it was my understanding that it was to be terminated altogether at this time and, if things changed, a new study would have to be done. Basing any decisions regarding airport expansion on outdated material is absurd. The economy is so bad that many people have reduced their traveling and travel only when necessary. I, for one, can't afford to go anywhere now or for the past few years - and I am not alone.

1 - 31

I am 200% opposed to any expansion plans for the Palm Beach Airport! And, although I don't know if my neighbors on my block of voiced their opinion I know the 2 homeowners on my east and the 2 homeowners on my west feel the same way.

1 - 32

I hope you listen to me and to all the people who will be most effected by the expansion of this airport.

Sincerely,

Melodie Janis
561-832-1275



saxz@att.net <saxz@att.net>

03/21/2011 07:25 PM

To pbia-eis@urscorp.com

cc

bcc

Subject NO Airport Expansion!

[The airport expansion is the wrong use of Palm Beach County taxpayers money. Do NOT waste our money on this unnecessary project.]

1 - 33

Annabeth Karson
1505 North Palmway
Lake Worth, Fl 33460



"Hillary" <spiderhill@usa.net>

03/20/2011 09:17 PM

To <pbia-eis@urscorp.com>

cc

bcc

Subject Airport Expansion

I STRONGLY oppose the airport expansion. The data does not support it, and we do not need it. In these days of cutting things that we actually DO need, to expand the airport would be irresponsible.

1 - 34

Hillary Keyes
7010 NW 2nd Terrace
Boca Raton, FL 33487

"How wonderful it is that nobody need wait a single moment before starting to improve the world." --Anne Frank



Pearl Elrod <bunnyshutch1@yahoo.com>

03/21/2011 04:25 PM

To pbia-eis@urscorp.com

cc jburgess@landdesignsouth.com

bcc

Subject Airport Expansion

To Whom It May Concern:

If Gov Scott's recent decision not to go forward with the high speed railroad makes any sense at all, how can you possibly consider airport expansion when all projections indicate that it is not needed?

1 - 35

Pearl Markfield
302 SW First Ave
Delray Beach, Fl 33444



DMandCH@aol.com
03/22/2011 01:42 AM

To pbia-eis@urscorp.com
cc
bcc
Subject I oppose PBIA Airport Expansion

To whom it may concern:

I oppose any expansion of the PBIA Airport.

1 - 36

Thanks,
Drew Martin
500 Lake Ave. #102
Lake Worth, FL 33460



"Charles Mehler"
<c.mehler@comcast.net>

03/20/2011 09:59 PM

To <pbia-eis@urscorp.com>

cc

bcc

Subject [NO Expansion... (Again)]

1 - 37

Charles Mehler Palm Beach county



William <wmoss@comcast.net>

03/21/2011 11:09 AM

To <pbia-eis@urscorp.com>, <kmarcus@southlandpark.org>

cc

bcc

Subject PBIA -EIS

Ladies and Gentlemen:

[In this time of budget crunching, layoffs and cutting services this is definitely not the time to be considering spending millions of dollars for airport expansion.

26 - 18

Thank you for speaking up for us taxpayers and killing this unnecessary airport expansion project.]

Regards,

Bill Moss



Tom Pearson <pearsot@bellsouth.net>

03/21/2011 11:04 PM

To pbia-eis@urscorp.com, kmarcus@pbcgov.org, svana@pbcgov.org, pburdick@pbcgov.org, sabrams@pbcgov.org, baaronso@pbcgov.org, jsantama@pbcgov.org, ptaylor@pbcgov.org, Alcee.Hastings@mail.house.gov, Bill_Nelson@nelson.senate.gov, allen.west@mail.house.gov, Tom.Rooney@mail.house.gov, Wendi.Lipsich@mail.house.gov, jobeth.banas@mail.house.gov, barbicane3333@aol.com

cc

bcc

Subject Regarding the FEIS PBI Airport Expansion Project

Dr. Tom Pearson
908 Andrews Road
West Palm Beach, Fl. 33405

Mr. Bart Vernace, PE
Federal Aviation Administration
5950 Hazeltine National Drive
Suite 400
Orlando, FL 32822

March 21, 2011

Re: Comments regarding the FEIS PBI Airport Expansion Project

Dear Mr. Bart Vernace:

I am a resident of the West Palm Beach area located northeast of the Palm Beach International Airport. Since the time of the announced expansion project, it seems that all data and information have been manufactured to justify expansion of the facility, when in fact the data proves just the opposite. Instead of increased traffic at the facility, there has been a steady downward trend of airplane traffic at PBI since 1976. Simply because more direct routes and less expensive tickets are available at Ft. Lauderdale and Miami. The idea that this would improve is a farce. The purpose of the proposed expansion is to increase capacity at the airport and to handle more airplane traffic. The FAA should deny both conditionally and unconditionally the County Department of Airports' request approval for this project through the Final Environmental Impact Statement (FEIS).

1 - 38

26 - 19

26 - 5

In the 2008 Draft EIS the FAA declared:

2.3 PROBLEM STATEMENT Based on the requested Federal action outlined in the preceding section of this DEIS, the FAA noted two conditions that affect the ability of PBI to efficiently accommodate future aviation demand. First, the existing airfield infrastructure and geometry contribute to congestion and delay during peak periods of aircraft operations. Second, the projected growth in aircraft operations at PBI over time would increase average annual delay to unacceptable levels as established by the FAA.

Last year (2010) PBI recorded the lowest number of airplane operations in the last 35 years of operation. Under these conditions the existing airfield infrastructure and geometry **do not** contribute to congestion and delay. Based upon the FAA's 2009 Terminal Area Forecast used in the Final EIS we will not even reach the 2006 airplane operations, which we started the study out with, prior to the year 2030. The projected growth in aircraft operations at PBI over time **will not** increase average annual delay to unacceptable levels as established by the FAA. Based upon these facts the Final EIS should recommend the No-Project Alternative.

1 - 13

The Following Chart shows the operation data at PBI since 1976:

The study Team is to be commended for the following determinations:

- Based on actual aircraft activity records and the FAA's 2009 TAF, the agency has determined that the level of aircraft activity at PBIA **does not currently result in unacceptable levels of operational delay**.
- After the publication of the DEIS, and the review of comments on the DEIS, the **FAA determined that a more recent forecast of aviation activity that is representative of the changed conditions at PBIA should be used for the FEIS**. Subsequently, the FAA decided that, barring a full-fledged Aviation Forecast Update Study by the Airport Sponsor, the agency's own 2009 Terminal Area Forecast (2009 TAF), would be the most applicable forecast of aviation activity for use in the FEIS (see [Section ES 3.1](#) of this Executive Summary and [Section 1.2.4](#) of the FEIS for details on the 2009 TAF).

1 - 14

However since no modeling or Environmental Assessment of the alternatives was performed using the 2009 TAF, the FAA should update the study with the 2010 TAF which was published by the FAA prior to the release of this report and incorporate this data in all of the modeling analysis of the Impacts of the project.

26 - 6

In Chapter 1 the study goes on to state:

Based on the current level of aircraft operational activity at PBIA and the FAA's 2009 TAF, the AIP will not be needed at PBIA by the original 2013 implementation year identified in the September 2008 DEIS. For this FEIS, the implementation timeframe for the airport capacity enhancement component of the AIP (expansion of Runway 10R/28L) is based on a point in time when aircraft activity and delay levels at PBIA are again anticipated to result in unacceptable levels of aircraft operational delay, thereby supporting the need for the expansion of Runway 10R/28L. **The FAA's 2009 TAF suggests that the same number of aircraft operations as were generated at PBIA in 2006 may not be reached until 2030.** However, the FAA's TAF is updated on an annual basis and future TAF updates could possibly reflect a quicker recovery of aircraft operational activity at PBIA. If this occurs, the justification for the capacity enhancement component of the AIP may be realized at a point in time sooner than anticipated based upon the 2009 TAF. [Chapter 2.0](#), Purpose and Need, of this FEIS presents a discussion of the anticipated implementation timeframe for the AIP.

It is good the study Team acknowledges that the TAF is only a forecast and may not predict the future accurately. It is interesting that the study team is concerned about the TAF erring on the side of not being optimistic enough. We have additional data, the newly published 2010 TAF which indicates that the 2009 TAF erred on being too optimistic. The 2010 TAF shows the 2030 projection is reduced an additional 5% or 10,118 operations in relation to the 2009 TAF. So using the more up to date 2010 TAF actually predicts the airport will realize this justification later than anticipated in the study not sooner. The history of TAF's prepared for this airport have shown that the projections are always optimistic, not the other way around as this study is implying.

1 - 15

The Section on Terminal Area Forecasts states:

ES 1.3.2 FAA 2009 TERMINAL AREA FORECAST

Since mid-2008, the ongoing economic recession has resulted in reductions in the FAA's forecasts of aviation activity for PBIA, as well as most airports in the national system. Accordingly, the FAA's final 2009 TAF reflects this decrease in aviation activity that has occurred at PBIA after the release of the September 2008 DEIS. The 2009 TAF also indicates that aviation activity will continue to decline at PBIA through 2010, but that by 2011, aviation activity at PBIA will experience moderate, but steady growth. This projected increase of approximately +1.7 percent per year (varying over time) starting in 2011, is projected to continue through 2030, the last year for which the 2009 TAF provides forecast data. A summary of the actual 2009 operations and enplanements at PBIA, as well as the FAA's 2009 TAF is provided in **Table ES-2**.

The EIS does not discuss the assumed accuracy of Terminal Area Forecasts. It should be pointed out that even though there is a 35 year trend of actual data **showing a drop of operations of 1.7 percent per year** the FAA has never projected sustained drops in growth at PBIA. If the study were to evaluate the history of PBIA TAF's dating back to 2006 and greater they would find that the FAA on average projects a 1.7 percent growth rate for PBIA even though the actual data continues to decline at a rate of 1.7%.

1 - 16

The EIS introduces imaginary "Future Years" in Table ES-3:

The 2008 Record of Decision for The Development And Expansion Of Runway 9r/27l And Other Associated Airport Projects At Fort Lauderdale-Hollywood International Airport Broward County, Florida states:

The FAA standard for determining projected forecast consistency defines acceptable when a forecast is within 10 percent (+/-) for the five-year projection. For forecast projections within the 10-year and beyond, a 15 percent (+/-) difference is considered consistent with the FAA's TAF. (FAA Order 5100.38C *Airport Improvement Program Handbook*, paragraph 428.a. *AviationForecasting*.)

1 - 17

If Imaginary "Future Year 2" or Imaginary "Future Year 3" is reached prior to 2028 the data will be outside of the cone of forecast consistency. If the data is outside of the cone of forecast consistency all of the assumptions in regard to plane operations for model input in the Airport and Airspace Simulation Model (SIMMOD), the Emissions & Dispersion Modeling System (EDMS), Mobile Source Emission Model, and the Integrated Noise Model (INM) are suspect and not appropriate. A term known to modelers around the world is "Garbage in = Garbage out". If the model input is not valid the output is not either.

There are too many model input parameters to list that would drive up wait times at the airport but plane mix seems to be what the study uses to justify a drop in the Annual Service Volume (ASV) of 16% between Imaginary "Future Year 2" and Imaginary "Future Year 3". In regards to ASV the study failed to address my comment made on November 24th 2008:

"The assumption that the Annual Service Volume (ASV) will go down in 2018 based on an increased use of larger sized commercial aircraft is opposite of the assumption made in the Palm Beach International Airport Forecast Study, CH2M Hill, December 2005 which assumed that the use of smaller commercial planes would increase and larger commercial planes would decrease."

1 - 18

The study referred the reader to comment 1-134 which then goes on to refer the reader to 1-115.

1-115 Comment

The claim that there is "increased propensity for air travel to PBC" is not based on factual data as is not

valid. As explained in more detail later in this document, air travel to PBC has been decreasing for the last few decades, with the current aviation activity at PBIA being the lowest for at least the last thirty years.

Response

As a result of the 2009 TAF for PBIA, the Airport Sponsor deemed it necessary to re-evaluate the implementation plan and schedule for the AIP at PBIA. 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. However, the FAA acknowledges that these conditions may change over time. Therefore, the FAA will reassess them when a decision on the Long-Term components of the AIP or Alternative 2 is ripe to move forward and the FAA will be in a position to provide updated responses. The FAA and/or the Airport Sponsor will undertake the appropriate additional NEPA processing for the Long-Term components of the AIP when the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay.

No where does this address the conflicting assumptions of plane mix. If the FAA will address this at a later time they should not change the ASV in the FEIS in Imaginary “Future Year 3”. Furthermore the FAA should revisit the assumed plane mix which contradicts with the Palm Beach International Airport Forecast Study, CH2M Hill, December 2005 for the Imaginary “Future Years” modeled in the Airport and Airspace Simulation Model (SIMMOD).

1 - 98

If by some fluke an unexpected change occurs and the actual operations at PBIA reach imaginary “Future Year 1” operations of 204,054 prior to the year 2022 the forecast consistency would be unacceptable (greater than 15%) which would bring into question the entire EIS and the Record of Decision opening it up for legal challenge. If however PBIA reaches the imaginary “Future Year 1” operations of 204,054 after the year 2023 then the EIS would be out of date, again this would bring into question the entire EIS and the Record of Decision opening it up for legal challenge. This **2.6 million dollar** study has provided no resolution and will **drag out legal battles and legal costs** for the County and the Citizens of Palm Beach County.

1 - 19

1 - 99

The EIS analysis of the alternatives is **technically flawed**. To evaluate the alternatives the FAA should only use data points within the domain of the 2009 or 2010 TAF. Using imaginary Future Years which have no basis other than that they were the projected years 2013 and 2018 in the 2005 CH2M Hill Projections is not technically sound. The 2005 CH2M Hill Projections have been proven to be entirely inadequate based on actual data.

2 - 1

According to Bart Vernace, P.E. FAA’s PBIA EIS Study Manager, the FAA has never before issued a conditional approval in an EIS. This is unprecedented and creates a precedent for future EIS evaluations. The precedent set is that a projected moderate upward trend in the TAF evaluations (which is counter to the actual data) can be used to justify evaluating proposed alternatives based upon some imaginary “Future Year” and get unconditional approval for parts of the project and conditional approval for other parts of the project. This is an **abuse** of the Federal Environmental Impact Statement evaluation process.

26 - 7

The FAA needs to use data points that are within the TAF to evaluate the alternatives. Using imaginary data points that are outside of the domain of the TAF and outside of the acceptable forecast consistency range and which predetermines the outcome of the Alternatives analysis is **misleading and deceptive**.

26 - 8

The EIS is **ambiguous and unclear** on when the County should come back to receive approval for the portions of the project that are conditionally approved. The Study states:

26 - 9

In 2009, the demand as a percent of ASV was below the planning threshold of 60 to 75 percent of ASV. However, when the number of aircraft operations at PBIA reach the planning threshold of 60 to 75 percent of ASV, it would be prudent for the Airport Sponsor to re-initiate activities that would address capacity shortfalls at PBIA resulting from its runway configuration.

But then the study goes on to state:

Based on the data presented above in **Sections ES 2.5.1 and ES 2.5.2**, future increases in aircraft operations, in conjunction with PBIA’s existing runway configuration capacity limitations, would generate

unacceptable levels of operational delay at PBIA when aircraft operational levels reach approximately 200,000 operations.

But [the whole analysis seems to point to when the actual operations reach imaginary “Future Year 1” and forecasts project reaching imaginary “Future Year 2” and imaginary “Future Year3”. Does the approval process for the Conditional portions of the process begin when the ASV magically goes down in imaginary “Future Year 3” and the present levels of activity would put us over the threshold of 132,623 operations which is 60 percent of the Imaginary “Future Year 3”ASV? Is the ASV drop still in 2018 or is it some imaginary year yet to be determined? Is the activity the 158,066 operations, which is 60 percent of the existing ASV? Is it when we reach 200,000 operations? Or is it when we reach 204,054 operations?] The EIS is also ambiguous on the level of environmental studies needed to get unconditional approval of the conditional portion of the project. Since an EIS is only good for 5 years based upon changing conditions and data that is outdated and no longer relevant the EIS should state this and make it clear that if PBIA does not reach this condition within 5 years a new Full EIS would need to be conducted. 1 - 20 26 - 10

[This study is technically flawed due to use of Imaginary “Future Years” to evaluate the alternatives which are outside of the domain of the 2009 TAF and its cone of forecast consistency] [It is misleading and deceptive in that it acknowledges that there are no problems at this time or in the next 19 years, but it goes on to select an alternative and give conditional approval of that alternative] [This study is a waste of 2.6 million dollars in public funds, which is leading us towards wasting between 370 million to 730 million dollars of public funds. The FAA should do the right thing and deny both conditionally and unconditionally the County Department of Airports’ request of approval for this project through the Final Environmental Impact Statement (FEIS).] 1 - 21 1 - 22 26 - 11

Sincerely,

Dr. Tom Pearson
908 Andrews Road
West Palm Beach, Fl. 33405

HISTORIC



A National Historic District of the City of West Palm Beach

P.O. Box 6451
West Palm Beach, FL 33405

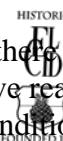
March 21, 2011

Final Environmental Impact Statement (FEIS)
For Proposed Airfield Improvement Project
Palm Beach International Airport
Palm Beach County, Florida

Comments and Concerns from the El Cid Historic Neighborhood Association, Inc.

On behalf of the residents of the Historic El Cid neighborhood, the following comments and concerns are submitted on the FEIS.

1. [After years of public meetings, focus groups, etc. it is indeed unfortunate that neither URS nor the FAA saw the value in having a concluding public meeting to properly inform the general public and potentially affected property owners of the specific conclusions drawn and recommendations made in the FEIS. The report is not presented in layman's terms and, as such, does not make information available in a comprehensible way to the general public.] 29 - 5
2. [The statement in the FEIS that the downturn in air traffic was fueled by the "nation wide economic recession" is presented as a statement of fact rather than the conjecture that it is. Aircraft operations at PBIA have decreased significantly over the last 30 years. Even though airplane activity decreased at significant rates, the annual future activity forecasts generated by the FAA and PBIA during the same period continued to overestimate future activity at the airport and inaccurately predict increases in airplane activity. Given the use of data which has not accurately reflected the levels of traffic at PBIA, it is unsound and unwise for the FAA to make future decisions on the proposed runway expansion based on forecasts that are done using on flawed methodology. If the goal is to look at the facts objectively and make decisions based on accurate data, the conclusions in the FEIS should reflect a position that a new EIS should be launched at the time that this downturn in activity begins to change. Only then is there a possibility to objectively and accurately determine what expansion, if any, can be justified.] 1 - 40
3. [The FEIS states that the PBIA project will not go forward until such time as there is justification of increased traffic levels. It further states once traffic levels have reached the required threshold, the currently proposed expansion project will be unconditionally approved.] 1 - 41
As property owners and residents who are directly affected by any and all changes at PBIA we feel that it is of utmost importance that there be a new EIS performed, taking into consideration all data (including ALL environmental 1 - 42



impacts such as noise, air and water pollution, and impacts on historic designated neighborhoods/structures) within the five years immediately preceding the request for project approval. To approve a proposed project in 2011, which might not be justified until 2030 is reckless and irresponsible and just bad business planning. While it is acknowledged in the FEIS that there is no hard and fast method to predict air traffic levels for the future with any certainty at this time, it should also be acknowledged that there is no hard and fast method to predict what the environmental impacts for such a project will be 15 to 20 years from now. While it appears that there is an effort by the FAA to help PBIA avoid paying for another study by giving approval for a project possibly 30 years hence, it is not the role of the FAA to rescue PBIA from their costly mistake of applying for an expansion project for which there was inadequate justification to move it forward.

1 - 43

4. The approval of the current PBIA Expansion project in phases causes some serious concern by our residents. PBIA has a track record of asking for and receiving approvals from the FAA for infrastructure projects that are done to justify future actions. The I-95 Interconnect (airport entrance/exit at Belvedere Road)was built anticipating future growth and ensuring that the infrastructure was in place for future expansion requests. Those ramps have never gotten the use that would justify the cost outlay for such a project. An additional project expanded the parking garage at PBIA. This is the same garage that has such under use that presently floors are closed and electricity turned off to reduce costs of operation. Clearly this project was not needed. **No approvals should be granted for near term or long-term components of the expansion until and only until there has been a new EIS using timely, current and accurate information within the five-year request window.**

1 - 44

In closing, it is often stated that the airports in this country do not use tax dollars for operation. A statement such as this one is a matter of semantics. While there are no government tax dollars supporting airport projects, Passenger Facility Charges and other fees to airlines certainly are paid by people who pay taxes. Granted, the fees and charges do not go into the public tax coffers, but ARE paid by the public. To entertain unnecessary expansion efforts at a time when oil prices are affecting the cost of air travel all over the world is questionable at best.

25 - 1

We strongly support denying the expansion request from PBIA at this time. In the future, any request for expansion should be evaluated at that time, on the merits of justification.

1 - 45

Respectfully Submitted,

E signature

Nancy S. Pullum
President





lynne purvis <lynnejpurvis@gmail.com>

03/21/2011 08:57 PM

To pbia-eis@urscorp.com, kmarcus@pbcgov.org,
svana@pbcgov.org, pburdick@pbcgov.org,
sabrams@pbcgov.org, baaronso@pbcgov.org,
jsantama@pbcgov.org, ptaylor@pbcgov.org,
bailey@southlandpark.org

cc

bcc

Subject NO PBIA EXPANSION

We don't need it!

1 - 55

Lynne Purvis
Lake Worth
561-596-8416

--

"Our search for a future that works keeps spiraling back to an ancient connection between ourselves and the earth, an interconnectedness that ancient cultures have never abandoned." -
Helena Norberg-Hodge



Reillymd1 <reillymd1@aol.com>

02/21/2011 07:26 AM

To pbia-eis@urscorp.com

cc

bcc

Subject Comment Period

I have recently spotted several birds of prey flying over the property. Can we check and see if there are any nesting birds in the area.
Thanks.

10 - 1



Jrodjacc@aol.com
03/21/2011 11:23 PM

To Jrodjacc@aol.com, pbia-eis@urscorp.com
cc kmarcus@pbcgov.org, svana@pbcgov.org,
pburdick@pbcgov.org, sabrams@pbcgov.org,
baaronson@pbcgov.org, jsantama@pbcgov.org,
ptaylor@pbcgov.org

bcc

Subject Re: NO PBIA EXPANSION Follow to original

Basically the communication with Hispanic residents was zero, I received 10 copies a week and half (while the general comment process was 45 days). 10 copies for thousands of residents.

29 - 6

Where is the social justice? This is one of the most impacted area, this the segment of the population that is going to be exposed to noise and pollution. Hundreds of children and elderly people without a voice, without a vote, without a COMMENT!

18 - 1

Your listed FAX NUMBER is another issue; in other to access the number you were supposed to provide a five digit code, before dialing the number. (as per ATT operator). I strongly tried to make the point to Mr. Nagy that not everyone has a computer, therefore fax access was needed.

29 - 7

You have deprived hundreds of people of their right to participate, either by language or by technology access.

29 - 8

Also I have a big concern about the CONFLICT of INTEREST of the F. A. A and U. R. S. Four years ago hired Mr. Nagy from U. R. S to conduct the Environmental Impact Study on behalf of P.B.I.A, for that period he was the leading consultant conducting the E. I. S. and meeting with the concerned residents of Palm Beach County. Now as of January of 2011, right before the release of the E.I.S, Mr Nagy left U. R. S to become an Environmental Consultant for the F. A. A Regional Office in Orlando Florida. He will reviewing , analyzing the public comments from the public on his work and then making recommendations to the outcome of the E. I. S for Expansion plan. **Is that not a conflict of interest ? Is he going to be impartial / partial on his findings on the public comments ? It does not look good , it does not smell good, It is not right ? Any one watching this ?**

26 - 21

Finally PBIA , FAA URS are asking for something with no precedence, they are putting the project on hold for now. Yet they want to use the EIS later on when they decide to procede. This is not acceptable, air, noise, all environmental issues change constantly. If an expansion is needed because air traffic has increased, the a new full blown E I S should be conducted again.

26 - 22

Government Spending ! a huge unnecessary expenditure by the time that this project is finished. Just like the infamous I-95 Pbia interconnect to nowhere that no one uses. HUNDREDS OF MILLIONS OVER BUDGET ! and for What? **The fleecing of Florida, Palm Beach County and DOT.**

26 - 23

Are we ever going to learn from our past, The Country, The State , The City everyone is in financial distress, yet we want to waste almost a billion dollars by the time that is completed for a couple of hundred feet of pavement.

STOP THE MADNESS , **NO!!!!!!!** TO PBIA EXPANSION

Jose I. Rodriguez
3639 Paseo Andalusia
West Palm Beach, FI 33405



Jrodjacc@aol.com
03/21/2011 10:31 PM

To pbia-eis@urscorp.com, bart.varnace@faa.gov
cc kmarcus@pbcgov.org, svana@pbcgov.org,
pburdick@pbcgov.org, sabrams@pbcgov.org,
baaronson@pbcgov.org, jsantama@pbcgov.org,
ptaylor@pbcgov.org
bcc
Subject NO PBIA EXPANSION

Mr. Varnace,

Estoy escribiendo en espanol con relacion al estudio que se hizo en la consideracion para la Expansion de el Aeropuerto Internacional de Palm Beach.

[La comunidad Hispana que compone 45% a 60 % de la poblacion afectada por esta expansion no ha recibido adecuada informacion en el expediente final de este estudio. No fue hasta cuando yo me comuniqué con el señor Allan Negy que obtuvimos 10 volúmenes del estudio resumido. (bajo protesta de parte del Sr. Negy hasta el momento en que mencione Justicia Social y Ambiental).]

29 - 9

[Tampoco la informacion estuvo disponible en el enlace electronico hasta la semana pasada.]

29 - 10

Please see second page of this PDF for an English translation of the comments made in this email.

Comments received in an email (dated 3/21/2011 at 10:31 PM) from Jose Rodriguez (Jrodiacc@aol.com) on the Palm Beach International Airport FEIS. Comments translated from Spanish to English by URS Corporation.

Translated comment:

Mr. Varnace,

I am writing in Spanish regarding the study made to expand Palm Beach International Airport.

[The Hispanic community, which makes up 45 to 60% of the population impacted by this expansion has not received adequate information related to the final report of this study. It wasn't until I reached Mr. Allan Nagy that we received ten copies of the executive summary (under protest by Mr. Nagy until the moment I mentioned Environmental and Social Justice).] 29 - 9

[The information also was unavailable in the electronic link until last week.] 29 - 10



"Romano, Maria" <mromano@sfwmd.gov>

03/18/2011 05:32 PM

To <pbia-eis@urscorp.com>, <bart.vernace@faa.gov>

cc "Romano, Maria" <mromano@sfwmd.gov>

bcc

Subject PBI airport expansion - AGAINST

Mr. Bart Vernace, PE
Assistant Manager
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive
Citadel International Building, Suite 400
Orlando, Florida 32822.

Dear Mr. Vernace,

Please do not approve the PBI airport expansion. We have adequate capacity for the next several years, and it is a waste of taxpayer dollars to move forward with this plan. There are beautiful historic neighborhoods in the affected zone, which would suffer increased noise and traffic as a result. The North County Airport is a better alternative to shift General Aviation away from PBI. As a taxpayer and a person who lives and works in West Palm Beach, I have concerns about spending tax dollars on an unneeded project which would be detrimental to the surrounding homes and businesses.

1 - 46

13 - 1

2 - 2

26 - 24

Thank you for considering my request.

Sincerely,

Maria Romano, SPHR
8411 Staniel Cay
W. Palm Beach, FL 33411
email: mromano@sfwmd.gov
Phone: 561-682-2395

Florida enjoys a broad public records law. Any e-mails sent to or from this address will be subject to review by the public unless exempt by law.



scmrooney@aol.com

03/21/2011 11:08 AM

To pbia-eis@urscorp.com

cc

bcc

Subject NO EXPANSION AT PBIA !!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Stuart Rooney,
922 Paseo Palmera,
West Palm Beach,
FL 33405

I am writing to express my very strong feelings AGAINST the expansion of PBIA. It is unnecessary and a complete and utter waste of money. There is not enough air traffic now, and will not be for the foreseeable future. If there is a possible need for an expansion several decades in the future, studies should be done at that time to see if it is warranted. Using outdated data will not accomplish this. Furthermore, these studies should be done using impartial people, not people like Allan Nagy who was a consultant on the EIS project and has now been hired by the FAA to work on the PBIA situation. The bottom line is that there is no need for any expansion now or for many years to come.

1 - 47

26 - 25

26 - 26

Sincerely,
Stuart Rooney



robert schrotenboer <schrotenboard@att.net>

03/20/2011 07:37 PM

To pbia-eis@urscorp.com

cc

bcc

Subject pbia airport expansion

My name is Robert Schrotenboer and I live at 944 Andrews road.

I urge you to reject any expansion of PBIA. Palm beach county taxpayers cannot afford any more support for a boutique airport that does nothing to serve them.

26 - 27

It is continually the highest priced airport in the area in terms of fares and parking.

The EIS did not obtain soil samples from the two public schools directly in the flight path, instead collecting at a park near a water source(possible contamination), and on the island of Palm Beach.

5 - 2

Any expansion would be a misuse of funds for an unwarranted and unwanted runway.

1 - 48

Robert and Claire Schrotenboer



Rodney Statham <rodneystatham@gmail.com>

03/21/2011 04:23 PM

To pbia-eis@urscorp.com, kmarcus@pbcgov.org,
svana@pbcgov.org, pburdick@pbcgov.org,
sabrams@pbcgov.org, baaronso@pbcgov.org,
jsantama@pbcgov.org, ptaylor@pbcgov.org,
bailey@southlandpark.org

cc

bcc

Subject vote no on the pbia expansion

[Please vote no on this expansion. Since 2005 traffic has declined each year. Even if traffic increases it will not reach the level necessary that would require expansion. There is no need for it now, in 5 years, 10 years or 20 years. Let's save the money toward projects that have a more immediate need. Please vote no on this expansion.]

1 - 49

Rodney Statham
1953 Freeport Drive
Riviera Beach, FL 33404

561-247-1449



Casey & Michael <letop13@comcast.net>

03/20/2011 07:30 PM

To pbia-eis@urscorp.com

cc

bcc

Subject No Expansion

To whom it may concern,

Our names are Michael & Casey Virata. We live at 3109 Clyde Road. I, Casey, have lived in this area all of my life (38 years) and my family has been at Clyde and Robert Road since the homes were built out of orange groves in the 50's. [As someone who has spent all of her life here I can say that this expansion is a huge mistake. Not only for the families that grew here and are now raising their children here- but for the history and small town feel that this would be destroying. Please consider all sides of this expansion...before you decide to destroy generations of neighborhoods for mere financial gain. There is something to be said about keeping a community small and I think in this case West Palm Beach would benefit from it. We don't need more traffic, more fast food places, more rental cars and hotels or _more airplane traffic_...we need to keep West Palm what it became famous for- a quaint, friendly, beachy town.] [Build a new airport further north....please!]

23 - 3

2 - 3

[We say NO to the expansion....no way!!!!]

1 - 50

-Casey & Michael Virata
family of Doris & Henry Chinnners and Lena & HW Chinnners Jr.



Gregg Weiss <greggweiss@hotmail.com>

03/21/2011 05:25 PM

To <pbia-eis@urscorp.com>

cc

bcc

Subject Comment FEIS

It is my understanding that a conditional approval has never been granted by the FAA as it is being granted to the PBIA expansion. Under what authority does the FAA have the ability to grant a conditional approval? How can an approval be granted in the future without requiring a new environmental impact study and not taking into account changed conditions mat both the airport and to the surrounding areas?

26 - 28

26 - 29

Gregg Weiss

615 Kanuga Dr.

West Palm Beach, FL 33401



Joyppwell@aol.com
03/22/2011 12:40 AM

To pbia-eis@urscorp.com
cc
bcc
Subject pbia-eis

From Joyce Wellington
217 Argyle Road
West Palm Beach
Florida 33405
Phone 561 659 0152

To Mr. Bart Vernace, PE, Assistant Manager, Federal Aviation Administration

Dear Mr Vernace

I have lived here in W. P. B. for about 5 years. The noise pollution has increased significantly. The planes fry so low over my home that you can see the different things on the bottom of the plane. All Conversation comes to a stop, and the windows of the house rattle! The outdoor furniture is covered with black grit and suet, everyday. You cannot leisurely go out on your terrace and sit down because your clothes would become dirty and it would grind into the fabric on the chairs. So you have to sweep everything off and use Windex on the tables each time you want to use your outdoor areas.

3 - 5

5 - 3

This is the highest real estate tax in the county, therefore we should not have to have had all of this noise thrust upon us. The pbia-eis is using our air space and charging us taxes when they are using our space for their own benefit. They should have to pay us for the use of our air space.

17 - 1

I would say that we should not have to pay the taxes that we do, but the noise pollution is destroying the monetary value of my home, not fair.

The private planes make a lot of noise. They should be flying out of another airport in another area of the county to at least spread the noise around. We should not get the whole load. It is not fair.

2 - 4

Another option would be to fly the planes up and down the same direction as the interstates cover. They are already there we as taxpayers own the space and it is already a traffic pattern with noise and most of the land is for commercial use. When people go home they can then be at Peace.

2 - 5

Sometimes the planes come every two or three minutes for a half hour at a time usually at lunch time and at dinner time so that it is hard to entertain. I cannot leave my doors open to the outside because you cannot hear yourself think. and the planes wake you at night if the windows are left open.

3 - 6

Your plan that you have in the works is simply not satisfactory to anyone in the Palm Beach, West Palm Beach Area around the ocean and inland waterway.

1 - 51

Please let me know that you got this email and that you will respond to all of the concerns.

Using airspace that we own
Not paying us for it
charging us taxes when you have thrust deafness in the future on us(Like radation from a reactor)
not spreading the private planes to other airports in the county
not flying over the interstates which are commercial for the most part
Not requiring planes to have better mufflers and to fly at a higher altitude upon takeoff
Not really doing anything about how loud the planes are.
They should not be aloud to fly if they do not comply with more quiet inforcements

23 - 4

sincerely
Joyce Wellington



Steve Willeford <stvwilleford@yahoo.com>

03/21/2011 08:00 AM

To pbia-eis@urscorp.com

cc

bcc

Subject PBIA

[PLEASE DO NOT WASTE YOUR AND OUR MONEY ON EXPANSION AT PBIA, IT WILL
BENEFIT NO ONE!!] THANKS. STEVE WILLEFORD PB COUNTY RESIDENT SINCE 1970

1 - 52



maryluw <maryluw@bellsouth.net>

03/21/2011 11:34 AM

To pbia-eis@urscorp.com

cc

bcc

Subject PBIA FEIS Comments

I am against the proposed expansion of the PBIA.

1 - 53

My family has been in the neighborhood to the east of the airport (Vedado) for over 60 years. The airport cannot undertake additional expansion without destroying what's left of this beautiful and enticing neighborhood.

13 - 2

My reasons against the expansion are as follows:

1. Additional pollutants, vibrations and noise
2. There is no demonstrated or viable reason to expand PBIA; instead ONCE VIABLE REASONS ARE ESTABLISHED AND **VETTED** for any additional expansion, said expansion should take place in North County Airport.
3. This attempted expansion is NOTHING MORE than a complete fraud and misuse of taxpayer funds. In an age where our beloved Nation needs to cut back, it seems the usual status quo nutjobs are at the helm trying to place their names on some piece of useless budget expenditures. For what? To make themselves feel more constructive, effective and worthwhile? I assure you, cutting back on spending which is doing what is right and what is hard is the higher road to achieving these intentions.

23 - 5

I implore you, in the name of sanity, to reject this crazy notion that PBIA needs to be expanded!!!

1 - 54

Kindest regards,

Mary Rowan Workman

2761 Village Blvd., Apt. 306

West Palm Beach, FL 33409

(561) 615-0773



March 21, 2011

Letter from Donald Trump to Bart Vernace, FAA

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

Re: FEIS for PBIA, February 4, 2011

Dear Mr. Vernace:

I have the following comments on the FEIS.

[The FEIS is 3,000 pages long. This morass of paper tries to hide the fact that there is no real basis for the airport expansion project which includes a new runway. Its “analysis” is biased, incomplete, misleading, and unreliable. The FEIS ignores the multitude of problems with the new runway plan, including the lack of any need for a new runway, the lack of any benefits from a new runway, and the environmental problems it would cause. The FEIS is a deeply embarrassing performance, which has already wasted millions of dollars of public funds. The consultant who did it should be fired.]

26 - 30

[The 2008 FEIS for a runway at Ft. Lauderdale provides a startling contrast. It was done competently and objectively by a different consultant than the FEIS for PBIA. It represents the type of analysis that should have been conducted here, but was not.]

26 - 31

[The Ft. Lauderdale FEIS proves the irrationality of the PBIA new runway plan. Ft. Lauderdale analyzed a second east/west runway 850 feet apart from and parallel to the

1 - 56

existing east/west runway. Ft. Lauderdale rejected that plan because such a runway would do little or nothing to increase capacity or reduce congestion and delays.

In 1998, Palm Beach County also studied building a new east/west runway parallel and close to the existing main runway. The County's analysis concluded that such a runway was impractical and should not be built. No other commercial airport in this country the size of PBIA or larger has built a new runway so close to an existing runway because it makes absolutely no sense.

1 - 57

2 - 6

The new runway is not needed. There are no delays, there never have been, and never will be. I regularly fly into 30 airports. Palm Beach is the least crowded. In 25 years of flying in and out of Palm Beach, I have never had any delays. Even the FEIS projects no delays until after 2030, if ever.

1 - 58

But even if a new runway was needed, which it is not, all the Airport would have to do is lengthen the already existing diagonal runway (13/31), which is a project that could be done at very little cost and would give a much better result in terms of wind direction. Also, none of the many buildings which would need to be demolished under the Pelly plan for a new runway would have to be touched. Another alternative would be regular use of fanning departures, which can be accomplished at absolutely no cost. This would allow more airplanes to take off at much quicker intervals. It is also the preferred plan of almost all impacted residents and businesses, and would go a long way toward solving the damage to Mar-a-Lago and resulting liability of the County. Yet another alternative is the expansion of the North County Airport in accordance with the County's 2006 Plan so that it can accommodate a significant portion of the private jets that now use the Airport, which would cost only a few million dollars.

2 - 7

2 - 8

2 - 9

2 - 10

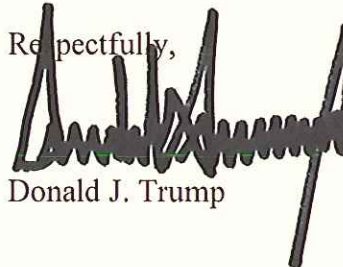
If the new runway made sense, I would support it. If it was really necessary to expand the Airport, I would be in favor of it. I have been a proponent of private aviation for a very long time. But I completely oppose squandering public funds on a costly scheme that has no benefits. 1 - 59

The FEIS admits that the only possible problem in the distant future is caused by private jets at peak months of the year, on peak days, at peak hours. To spend hundreds of millions of dollars to reduce such delays is irrational. The new runway would require the demolition of two state-of-the-art FBO facilities, Signature and Jet Aviation. Tearing down the two FBOs will actually create longer delays because of longer taxi times to the new locations. 1 - 60
2 - 11

The FAA should want to be a good neighbor. The FAA should pay attention to the entire community, not just the Airport Director. This Airport expansion plan is not necessary. No one is in favor of it except the County. It is a fraud concocted by the Airport Director. 26 - 32

More detailed comments to the FEIS are attached. I urge you to fulfill your fiduciary responsibilities to the citizens of this County and reject the Plan for a new runway. The federal government is running incredibly huge deficits, and should not waste many hundreds of millions of dollars on a totally unnecessary project at Palm Beach Airport. The Plan should not be approved in any way, conditional or otherwise. Public funds should not be squandered on this unnecessary project. 26 - 33
26 - 34
1 - 61

Respectfully,



Donald J. Trump

**Comments of Donald J. Trump
and Mar-A-Lago, L.L.C., L.C.
on
Final Environmental Impact Statement
dated February 4, 2001
submitted to
Federal Aviation Administration**

March 21, 2011

Summary of Deficiencies in the FEIS

1. [There is no need for the FEIS and no basis for approving the Plan, because there is no current need for a new runway, and no projected need until at least 2030, if ever.] 1 - 62
2. [The FEIS should never be used for any reason because its data and methodology are unreliable, biased, incomplete, and deceptive.] 26 - 35
3. [The only possible benefit of the Plan is to reduce delays for private jets at peak periods. There are no delays for the public which used commercial airliners, and never will be.] 1 - 63
4. [The definition of delay is misleading. There is no single definition of acceptable delay; other airports use 6 to 10 minutes. The FEIS uses 4.8 minutes, which deceptively overstates delay by 25% compared to use of 6 minutes.] 1 - 64
5. ["Peak periods" is not defined or explained. What months? What days? What hours?] 1 - 65
6. [There is no data showing actual delay at present or at any time in the past, because the historical data destroys the attempted justification for the Plan.] 1 - 66
7. [The delay forecasts are invalid because they do not take into account:
 - Planned technological improvements in FAA air traffic control.
 - The continuous trend of the airlines to use larger aircraft so that more passengers can be carried in fewer planes. 1 - 67
 - Delays caused by congestion outside the Airport such as congestion at other airports which have substantial delays, such as LaGuardia.
 - The projected growth of Ft. Lauderdale International, whose market area overlaps that of PBIA.]

8. [The proposed new runway will be so close to the existing main runway that there would be significant operational restrictions that would prevent the runway from creating any real additional capacity.] 2 - 12
9. [The proposed new runway would require all landing aircraft to taxi across the main runway to reach the terminal or the two new FBOs, and taxi times would increase.] 2 - 13
10. [There are alternative ways to increase capacity and decrease any possible delays at far less cost.
- Increase use of fanning. 2 - 14
 - Develop North County Airport according to the County's 2006 plan so it can be used by small and medium private jets, which will reduce private jet operations at the Airport.
 - Lengthen the Diagonal Runway from 7,000 to 8,000 feet.]
11. [The FEIS states a total cost of \$370 million in 2007 dollars. But there is no cost detail.] 2 - 15
- The stated cost does not include the cost of rebuilding two FBOs, which will be at least \$100 million.]
12. [There is no cost benefit analysis. The cost will be no more than \$500 million; there would be little or no benefit.] 2 - 16
13. [The Plan will have unacceptable environmental impacts that are not disclosed or properly analyzed.
- Noise 2 - 17
 - Pollution from aircraft engine emissions.]

Donald J. Trump and Mar-a-Lago Club, L.L.C., L.C. (“Mar-a-Lago”) have the following comments on the FEIS, which include Mr. Trump’s cover letter to Mr. Vernace, and incorporates their comments on the Draft EIS.

The County’s proposed Long-Term Airfield Improvement Project should be rejected by the FAA in its entirety, and the FAA should deny any approval, conditional or otherwise, of the Long-Term Project. We have no comment on the Short-Term Project, except that the property acquisition on Military Trail should not be approved because it has no use for the Airport unless the new runway is built. These comments refer to the Long-Term Project (including the Military Trail property acquisition) as the “Plan”.

26 - 36
1 - 39

Introduction

As stated in the draft EIS dated September 2008, the County sought unconditional approval of a radical plan to turn the Airport upside down in order to build a new east-west runway. In the summer of 2009, the FAA advised the County that the FAA’s then current projections of future operations at the Airport would not justify the expansion plan through at least 2030.¹ Therefore, in January 2010, the County modified its request to the FAA and asked the FAA to conditionally approve the new runway project, which includes the demolition of two major FBOs on the south side of the Airport, and building new FBO facilities in the northwest corner of the Airport known as Golfview. The County asked the FAA to unconditionally approve three of the original components of the expansion plan: (1) a partial development of FBO facilities at Golfview; (2) widening

¹ An operation is a take off or landing of an aircraft.

taxiway L to accommodate larger aircraft; (3) approval of the acquisition of properties along Military Trail near the southwest corner of the Airport. Letter from Bruce Pelly to FAA, January 6, 2010.

Mr. Pelly asked the FAA to conditionally approve this FEIS, so that the Plan can be activated and promptly implemented whenever the County's future projections of Airport operations allegedly forecast significant delays.

26 - 59

An objective analysis of the Plan shows that the new runway is never going to be necessary, and should not receive any approval from the FAA, conditional or otherwise.

1 - 68

The acquisition of properties in the southwest corner of the Airport of only one purpose, which is associated with the new runway, and should likewise not receive any approval because it is not independent from the new runway plan.²

1 - 69

The FEIS states "the FAA acknowledges that is unknown at this time when the long-term AIP project will be needed and proposed for unconditional approval." FEIS at 3, fn. 6. The FEIS also concedes that there will be no need until at least 2030, *if ever*. The FEIS contends that unacceptable delays will occur at 204,054 operations. FEIS at ES-33. However, the FEIS forecasts only 200,589 operations by 2030. FEIS Table ES-2. The FAA's updated 2010 forecasts, which the FEIS ignores, predict even *fewer* operations—190,471—in 2030. *See* FAA APO TAF Detail Rept. for PBI (issued Dec. 2010). In short, demand projections are trending downward, and the Airport is not forecast to meet the delay threshold of 204,054 operations.

1 - 70

² The properties total 13.2 acres. FEIS at ES-13. The FEIS does not state the acquisition cost, but the Airport's September 2007 Financial Plan of the Airport shows the cost at approximately \$7 million.

[The data, analysis, and conclusions in the FEIS are so deeply flawed that the FEIS cannot be used, now or ever, as a basis for any FAA action. If and when there is any valid basis for the County to reconsider an Airport expansion plan, the FEIS process should begin anew, with a competent consultant who is objective, and not overly influenced by the County.] 26 - 20

The following example reflects how nonsensical “conditional” approval of the County’s plan would be. What if the County came to the FAA today with the following proposal: (1) there are no unacceptable delays at the Airport, and no current need for airport expansion; (2) ten years from now, we will show you a forecast; (3) that forecast will project that in ten more years, delays will be unacceptable; (4) today, we believe that building a new runway is the best way to alleviate the problem, which admittedly might never materialize; (5) today, we would like the FAA’s conditional approval of that runway plan. The FAA would certainly reject such a preposterous request out of hand.

I. There is no current or discernable future need for a new runway

A. The FEIS admits that there is no present need for a new runway at the Airport because there are no unacceptable delays.

[The Airport declares on its website that it is a “congestion free” airport, and has said the same thing since at least 2005.³ Yet Mr. Pelly’s letter to the FAA dated January 6, 2010, says the Airport experienced “intense congestion and delays” as recently as 2007. The FEIS contains absolutely no historical data to support Mr. Pelly’s deceptive statement.] 1 - 71

³ See <http://www.pbi.org/airport/facts.aspx>; http://waybackmachine.org/20050601000000*/http://www.pbi.org/airport/facts.aspx.

The lack of congestion is confirmed by the fact that the Airport does not meet the FAA's definition of a "congested airport."⁴

The FEIS concedes there is no present need for a new runway at the Airport, and there will be no need until at least 2030. The FEIS states that "unacceptable delays" will occur at 204,054 annual operations.⁵ See FEIS at ES-33. However, the FAA currently forecasts only 190,471 annual operations in 2030, which is far below the delay threshold.

Although there is no need for current or forecasted expansion, the County nevertheless requested that the FAA "conditionally approve" its plan for a new runway, so that the Plan can be activated as soon as the County can conjure up future forecasts which project unacceptable delay (as shown below, the definition of delay in the FEIS is also invalid.) The FEIS concedes that it is not possible to project when the Airport will reach a sufficient level of operations to create "unacceptable" delay. See FEIS at ES-15. 1 - 72

The FEIS completely ignores historical data showing actual delays, because the actual data would be fatal to the Plan. In 1998, there were 193,091 operations, and less than a minute of delay. See 2001 Strategic Master Plan Study (PBI) (Sections II & IV). In 2001, total operations at the Airport were 212,640. In that same year, the Airport stated that the Airport's "existing facilities are adequate to serve current demand types and levels." Strategic Master Plan 2001, page ES-8. The FEIS does not explain how the Airport facilities will ever be inadequate, when there are fewer operations today (140,348 in 2010) and fewer projected in 2030 (190,471). 1 - 73

Thus, there is no present need for the Long Term Project, there never has been,

⁴ FAA Airport Capacity Benchmark Report 2004; 49 U.S.C. §47175(2).

⁵ An "operation" at an airport is a take off or a landing.

and never will be. There is no reliable forecast of any need until some unknown and unknowable time in the distant future.⁶ Therefore, there is no need to study the airport runway expansion now, let alone approve a plan. Any approval, conditional or otherwise, would be illogical. 1 - 74

We are not aware of the FAA ever granting a conditional approval where the condition to be fulfilled is the need for the project in the first place. It would be illogical to do so. 26 - 37

The FAA can only approve a plan if “the project will be completed without unnecessary delay.” 49 U.S.C. § 47106(a)(4). It is impossible for the FEIS to meet this requirement because the project may never begin at all. Moreover, an airport cannot seek FAA approval for a new airport layout plan, begin an environmental impact study, and then midway through the process, ask for it to be made conditional when it runs into problems such as drastically changed projections. See DOT Order 5050.4B, section 202.c.(4). To the contrary, FAA policy allows for approval midstream only of truly independent projects only if they are subject of certain types of federal funding, neither of which exists here. 26 - 38
26 - 39

If a supportable and provable real need for a second runway ever arises, the County should then submit a new project plan and a new EIS should be conducted, objectively and competently, analyzing all then current and forecast economic, market, demographic, environmental, and land use realities and constraints that simply cannot be 26 - 40

⁶ Predicting future operations at the Airport has been historically unreliable. For example, the forecast used in the 2008 DEIS projected that there would be 212,804 operations at the Airport in 2010. But the *actual* number of operations for 2010 was 141,387. Thus, the 2008 forecast only two years into the future was off by 35%. If a two-year forecast is so inaccurate, a 20 year forecast is meaningless. 1 - 75

known, let alone analyzed, today.

B. The FEIS is misleading because it hides the fact that the only possible potential benefit of the Plan is for private jets.

The only conceivable “need” for the proposed runway is to reduce theoretical peak time delays caused by *private jets* that may occur far in the future. The Plan would cost hundreds of millions of dollars, and the only benefit would be to the very few people who fly on private jets. The FAA should not approve a plan that does not fit its mission of providing benefits to the general public.⁷

1 - 76

The Airport is unique because commercial airliners account for only one-third of the aircraft operations at the Airport. At Ft. Lauderdale, private jets are only about 20% of total operations. The FEIS delay analysis ignores the fact that if the Airport reduced private jets to 20% of total operations, airline operations could more than double, from 33% to 80%, without any increase in total operations.

1 - 77

In addition, it is our understanding that due to typical air space conditions, as a practical matter, whenever congestion occurs, commercial airlines essentially have priority over private jets for take-offs. If this is not the current tower policy, it could be easily implemented, and the FEIS does not suggest otherwise. This would completely eliminate any delays of commercial airline traffic.

2 - 18

C. The FEIS is misleading because it fails to disclose that any theoretical future delay for private jets would be seasonal, and only on peak days at peak times.

The FEIS purports to address two problems: hypothetical future delays during “peak periods,” and hypothetical future annual average delays. See FEIS at ES 2.4.1 and

⁷ The FAA’s recent approval of a new runway at Ft. Lauderdale Airport was granted based exclusively on projected delays in commercial “air carrier” traffic. See Dec. 2008 FAA Record of Decision at page i, 4, 5, and 37.

ES 2.4.2. However, a careful reading of the FEIS reveals that the only purpose of the Plan is to reduce hypothetical future “peak periods” delay for private jets. But the FEIS does not ever say what “peak period” means.]

1 - 78

[The FEIS fails to disclose, discuss, or analyze the fact that the Airport is the only commercial airport in the country of its size or larger that has a wide fluctuation in seasonal operations. The number of Airport operations during the winter is approximately twice as much as the summer. During the winter, the peak days for private jets are arrivals on Friday and departures on Sunday, and the peak hours are Friday afternoon and Sunday afternoon. There is relatively little private jet traffic in the summer.]

1 - 79

[The FEIS’s failure to address these fundamental facts about the seasonal nature of Airport’s operations produces a fatally flawed analysis. The purported amount of congestion and delay at the Airport will occur (if at all) for a few months out of the year, on peak days and peak times. But the FEIS does not identify how often such operational delays will occur, or what periods of time will constitute “peak hours.” Spending hundreds of millions of dollars to address undefined and unanalyzed peak delays would be completely irrational and would irresponsibly squander public funds.]

1 - 80

D. The FEIS’s definition of unacceptable delay is arbitrary and contrary to the definition used by the FAA at other airports.

[The FEIS states that “the onset of more rapid growth in delay often occurs when delay is between 4 and 6 minutes per aircraft operation.” FEIS at ES-28. Then the FEIS arbitrarily uses an annualized aircraft delay definition of 4.8 minutes calculate the need for a new runway.] Table ES-5.

1 - 81

[The 4.8 minute definition of delay is completely arbitrary, and one more example

of the FEIS skewing the analysis to concoct a justification for the new runway. The FEIS ignores the fact that the FAA has stated “a standard definition of acceptable ground delay *is not used in the industry* since numerous operation factors and airport characteristics influence the acceptability of delay.” See FAA FEIS for the Proposed Runway at Miami Int’l Airport, at 1-23, 1-32 (Sept. 1998) (emphasis added) (the “MIA FEIS”). In fact, the FAA has used delay times of 6 to 10 minutes when analyzing other South Florida airport development projects at Miami and Ft. Lauderdale. See MIA FEIS at 1-23, 1-32; 2008 Ft. Lauderdale FEIS at ES-10. 1 - 82

The difference between using 4.8 minutes instead of 6 minutes is 25%. Use of 6 minutes would push delay projections even farther beyond 2030. 1 - 83

The FEIS does not explain what it means by peak hour delays. Therefore, it is impossible to know whether peak delay, which is the only conceivable delay problem the Airport will ever have, has ever been in excess of the FEIS’s arbitrary delay threshold. 1 - 84

Even if delays at the Airport could be reliably projected to exceed six minutes in the foreseeable future, that would not be a sufficient reason for approving the Plan. The six minute delay definition is merely an ideal goal that may justify *consideration* of expansion, but the FAA does not require such expansion. 1 - 85

E. The data and methodology used in the FEIS to calculate delays is fatally flawed and incomplete.

- The FEIS’s delay analysis is really an analysis of possible “peak period” delays. But as discussed above, the FEIS does not define or explain what “peak period” means, and the FEIS uses an arbitrarily low delay definition of 4.8 minutes. There is no justification for spending vast amounts of public funds to alleviate occasional peak delays. 1 - 86

- [The FEIS inexplicably repeatedly ignores actual available data in favor of hypothetical computer models. The FEIS does not explain how it is possible that in 1998 average annual delay was only 0.6 minutes, while in 2006, when there were 9,300 less operations than in 1998, average annual delay reached 4.8 minutes. *See* Draft EIS at 1-9, 2-4. The historical data will prove the computer model used by the FEIS produces inaccurate results.] 1 - 87

- [The FEIS fails to address planned technological improvements that will significantly reduce future Airport delays. For example, the FAA's Next Generation Air Transportation System ("NextGen") is projected to reduce delays at the Airport by 25%. *See* FAA Capacity Needs in the National Airspace System, 2007-2025 (May 2007) at 15.] 1 - 88

- [The FEIS completely fails to analyze the impact of larger airliners in the fleet mix on future Airport operations. For the last 20 years or more, airlines have steadily shifted to larger and larger aircraft. That is why the Airport handles about the same number of passengers today as in 1990, but with significantly fewer airline operations. In 1990, there were 62,045 commercial airline operations; in 2010 there were 52,768. The number of passengers was about the same in 2010 as it was in 1990. Fewer operations mean less delay, not more.] [The entire purpose of widening taxiway L is to accommodate larger Group IV aircraft, which are almost exclusively airliners. *See* Pelly letter to FAA, January 6, 2010. All the airliners that presently use the Airport fall into the category of Group III or lower.] 1 - 89
1 - 90

- [The FEIS fails to analyze whether hypothetical future delays are a result of factors that are not related to conditions at the Airport. For example, delays at the Airport may be caused by arrival and departure delays at other airports, including many

congested airports in the northeast. Without studying non-Airport related causes of delay, the FEIS cannot state the true cause of any hypothetical future delays, and therefore cannot determine whether a new runway will cure such delays. 1 - 91

- The FEIS fails to address the impact of the current expansion of Fort Lauderdale International Airport on future air traffic at the Airport. Fort Lauderdale is projected to have a 33% growth in operations over the next 20 years (from 300,000 to 400,000). Fort Lauderdale is only 50 miles away from the Airport, and they have overlapping markets. It is likely that the Airport will lose a percentage of its future potential passengers to Fort Lauderdale. This appears to be the case: as operations at the Airport have decreased, operations at Fort Lauderdale have correspondingly increased. The FEIS fails to account for, let alone analyze, how the anticipated growth of Ft. Lauderdale will limit the growth of the Airport. 1 - 92

- The FEIS fails to analyze or account for the fact that if any delay arises in the future, aircraft operators and passengers themselves will take action to reduce delays, especially peak delays. For example, when delays begin to occur, “airlines would begin to use larger aircraft, adjust schedules, and cancel or consolidated flights during peak delay periods.” See FAA Airport Benefit-Cost Analysis Guidance (Dec. 15, 1999). “Passengers would make use of alternative airports. . . .” *Id.* This is particularly likely given Fort Lauderdale’s close proximity to the Airport. 1 - 93

- By essentially eliminating the Diagonal Runway for use by jets, the proposed new east/west runway will necessarily increase the east/west flow of air traffic. The FEIS utterly fails to analyze the effects of the increase in noise and air-to-ground pollution over the affected area under the east/west flight path. 26 - 41

- [The FEIS analysis ignores the increases in taxi time that would be created by the addition of the new runway. All airlines landing on the new runway would have to cross the main runway to reach the terminal. All incoming private jets would also have to cross the main runway to reach the two FBOs relocated to Golfview. Arriving airliners would have to cross the existing main runway to reach the terminal.] [The situation for private jets would be even worse, because two FBOs will be relocated to the far northwest corner of the Airport. In contrast, private jets now departing from the two FBOs currently located on the south side of the field have a very short taxi to reach the main runway.] [The FEIS contains no analysis of the additional taxi delays that would offset any possible time savings from operation of the proposed new runway.]

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II. Even if there was a theoretical need to reduce delays in the future, the proposed new runway will not reduce such delays.

As shown in Section I above, there is at present no unacceptable delay of aircraft operations at the Airport, and none is forecast to occur until at least 2030, if ever. [The FEIS's conclusion that the proposed new runway will reduce delays, if they ever actually occur is wrong because it is based on invalid assumptions, improper methodology, inaccurate data, and ignores critical factors.]

1 - 95

A. There is nothing inherently wrong with a single-runway airport.

[The FEIS asserts that there is a problem at the Airport because it is essentially operates as a single runway airport because the other large runway, which runs diagonally from northeast to southwest and crosses the main runway (the "Diagonal Runway"), is

used for less than 10% of the operations at the Airport.⁸ Of course, the Airport has operated as a “single runway” airport for decades, with minimal actual delay. So has Ft. Lauderdale, which has a far larger number of operations. Having a single runway is not in and of itself a problem, and the Airport’s main runway is more than sufficient to handle Airport operations now and for the foreseeable future.⁹ 1 - 96

Departing aircraft at the Airport are generally separated by a two to three minute interval. Obviously, no airplane can take off while the landing aircraft is still on the same runway. It takes about a minute and a half for the landing aircraft to land, slow down, and turn off of the runway. Since the interval for departing aircraft is more than 1.5 minutes, sequencing landings and takeoffs on a single runway does not cause any delay. Current and past operations on the single runway have not caused any unacceptable delays. 1 - 97

B. The proposed new runway would have no significant benefits because it will be subject to significant operational restrictions.

The FEIS erroneously asserts that that the proposed new runway would increase operational capacity and therefore reduce delays. However, the FEIS ignores the fact that the proposed new runway will have little or no ability to decrease future theoretical delays. This is because the distance between the proposed runway and the existing main runway would only be 800 feet, centerline to centerline.⁹ Although FAA regulations allow an airport to construct two runways with a minimum 800 feet of separation, we are 2 - 21

⁸ There is a third short narrow light load runway parallel and to the south of the main runway (10R/28L) that is rarely used at all because it cannot accommodate even small jets.

⁹ The distance between the edges of the two runways would be only 650 feet because each runway is 150 feet wide.

not aware of a single commercial airport in the country that has done so. That is because other FAA regulations do not allow simultaneous operations on both runways that are so close together. *See* AC 150/5300, Chapter 2. These operational restrictions are necessary to ensure the safe operations of airplane traffic.

All parallel runways that have been constructed in this country in the last several decades have been thousands of feet apart so there can be simultaneous operations on both runways, which allow an airport to handle additional traffic and reduce delays.

If there were a new runway, the two east/west runways would be treated as a single runway when wake turbulence is a factor, which is always the case with jet aircraft. There could not be a simultaneous take off and landing on each runway. If an aircraft is in position to take off, it must wait until the aircraft landing on the other runway has touched down. The departing aircraft can be released for take off while the landing aircraft is still on the other runway. Takeoff and landing restrictions and delays are exponentially worse in bad weather.¹⁰

This is why no airport in the country has built two minimally separated parallel runways in decades. Every other airport has been smart enough to realize that there is little or no advantage to be gained from two narrowly spaced parallel runways. The County recognized this fact when it studied and rejected the possibility of adding a second parallel runway in 1998. The County concluded that it would be completely impractical. The FEIS does not mention, much less explain the County's flip-flop on this issue.

¹⁰ One of the many reasons Ft. Lauderdale rejected building a second runway only 850 feet from its main runway because it would have average delays of up to 79 minutes in bad weather. Ft. Lauderdale Airport FEIS, 2008.

[Ft. Lauderdale Airport recently considered various ways to expand its capacity. In 2008, Ft. Lauderdale rejected the possibility of building two narrowly spaced parallel runways due primarily to the operational limitations, and is building a new runway widely separated from the existing main runway.] 2 - 25

[The limited operations available with closely spaced parallel runways can be contrasted with the widely spaced parallel runways that are found at almost all of the largest airports in the country, including Miami, Dulles, or JFK. When the two runways are separated by thousands of feet, there can be simultaneous takeoffs on both runways, or simultaneous landings on both runways, or a simultaneous takeoff on one and a landing on the other. This is a major advantage in handling air traffic at large congested airports.] 2 - 26

C. The proposed new runway would add to ground delay times and safety concerns, cancelling out any prospective benefits.

[The FEIS ignores the fact that the proposed runway would cause increased ground delays because of the additional taxi time needed to move an arriving airliner from the new runway, across the existing main runway, to the terminal. Private aircraft will also have longer taxi times because two FBO facilities will be demolished and rebuilt in the northwest corner of the Airport known as Golfview, which will cause increased taxi time from the new runway.] Moreover, [air traffic control would have to take additional precautions in coordinating takeoffs and landings because after aircraft land, they would have to cross over the active main runway to reach the terminal. The increased danger to passengers cannot be justified in light of the fact that there is no current or foreseeable need for a new runway at the Airport.] 2 - 27
2 - 28

III. Even if there were a need to reduce delay, there are more effective and less expensive alternatives than building a new

runway and relocating two FBOs.

The heart of any FEIS should be a robust analysis of all reasonable alternatives, thus “sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public.” 40 CFR § 1502.14. [The FEIS failed to adequately analyze the use of fanning, the expansion of the North County Airport, and the expansion of the Diagonal Runway. All of these alternatives, individually and collectively, would do far more to alleviate any possible future Airport congestion, and do so more efficiently and economically than building a new runway, and demolishing and relocating two FBOs. All these alternatives should be implemented.]

2 - 29

A. Fanning will efficiently reduce any future delays.

For at least 15 years, the County has strenuously encouraged the FAA to have all aircraft departing east on the main runway to fly straight out until the aircraft are approximately five miles beyond the shoreline over the ocean. Then, the aircraft is turned on course to its destination. Straight-line departures generally require about two to three minutes of separation between aircraft. Aircraft cannot fly closer together than that because of the wake turbulence that the aircraft ahead creates for the aircraft behind, and other obvious safety considerations that keep from aircraft flying close together on the same heading.

[Fanning, which the County has irrationally opposed, substantially reduces the take off separation interval.] To fan departures when several aircraft are waiting for take-off, for example, the first aircraft in line takes off, reaches a safe altitude of about 1,000 feet, and then makes a turn of at least 15 degrees. After one minute, the second aircraft in line may take off, and it turns at least 15 degrees to the other side. A minute later, the third

2 - 30

aircraft can take off and fly straight ahead—widely separated from the other two.

[Fanning generally allows three aircraft to take off in the time that only one aircraft can take off with no fanning. That is why the FAA tower orders fanning departures during peak times in order to reduce congestion, and because fanning is also safer.¹¹ In fact, the FEIS contains a chart which shows that fanning reduces departure delays by about 30%. App. B-4. However, the forecasts of delay in the FEIS assume that there is no fanning. A change in that assumption to use fanning would reduce delays by 30%, destroying the supposed rationale for a new runway.] 2 - 31 2 - 32

[The use of fanning as a general procedure would not require any additional infrastructure or costs, and would save approximately \$500 million. The FAA tower currently uses fanning when necessary to reduce delays; there is no reason for the FEIS to reject fanning.] 2 - 33

[The FEIS rejects fanning without detailed analysis because “it was determined that the short-term capacity benefits of fanning realized during peak departure periods would not occur when activity levels increase to the projected levels of approximately 221,000 annual aircraft operations.” FEIS at ES-50 (emphasis added). However, the Airport is nowhere near this level of operations, and is not projected to be at that level for at least 20 years, if ever. Therefore, the Airport should implement more extensive use of fanning procedures now, which will minimize delays and maximize safety, and the FEIS does not suggest otherwise.] 2 - 34

B. Lengthening the diagonal runway would alleviate any future hypothetical delays at least as much as the proposed new runway, and would cost several hundred million less.

[Another alternative to building the proposed new runway is to lengthen the

¹¹ Letter from Airport tower manager to Bruce Pelly, March 28, 2007.

diagonal runway (14/32) from 6,932 feet to approximately 8,000 feet, making it the same length as the proposed new runway. This would add at least as much capacity as the proposed new runway at a substantially lower cost of approximately \$5 million.¹² In fact, the FEIS concedes that expanded use of the diagonal runway at its current length would reduce any future delays that may occur.

2 - 35

And unlike the proposed new runway, the Diagonal Runway is easily accessible from the airline passenger terminal. It would also be easier for private jets to access the Diagonal Runway from the existing FBOs than it would for them to access the proposed new runway from the relocated FBOs.

2 - 36

The FEIS states two concerns about the expansion and greater use of the Diagonal Runway. Lengthening the Diagonal Runway to 8,000 feet will require the Airport to acquire “some” additional land to the north. The FEIS’s cursory seven line “analysis” fails to explain why this would not be possible, or what it would cost. There is no reason to believe that the Airport could not acquire the necessary land at a reasonable cost.¹³

2 - 37

The FEIS itself proposes to extend the northwest end of the diagonal runway by 480 feet. This would lengthen the diagonal runway to 7,412 feet. The FEIS does not state that there will be any difficulties, financial, operational, or otherwise in doing so. Adding another 500 feet would be just as feasible. There is no requirement for 8,000 feet, it is simply an optimal number to allow airliners to land with greater margins for error when runways are wet, or other adverse weather conditions.

2 - 38

¹² Although the Diagonal Runway does not have an advanced instrument landing system like the main runway, the system could be added at a relatively low cost.

¹³ The Airport has planned to spend at least \$7 million acquiring property on Military Trail in connection with the proposed new runway, even though the FAA has not approved it.

[The second concern in the FEIS is that simultaneous take offs and landings cannot be conducted on intersecting runways. However, the FEIS ignores the fact the simultaneous take offs and landings cannot take place on the two closely spaced parallel runways proposed in the FEIS.] 2 - 39

[In short, it is irrational to spend hundreds of millions of dollars on the proposed new runway when it Airport can achieve the same perceived benefits by lengthening the existing diagonal runway at a fraction of the cost.] 2 - 40

C. The FEIS ignores long-planned expansion of the North County Airport to accommodate small and medium jets.

[In its October 2006 Master Plan Update, the County proposed to expand North County airport to handle most of the types of small and medium size private jets that now use PBIA. Since private jets account for two-thirds of the total operations at the Airport, any purported future delays at the Airport will be attributable primarily to private jets, not commercial airliners. A significant amount of this private jet traffic could and should be shifted to the North County Airport instead of building a new runway at PBIA.] 2 - 41

North County was built as a reliever airport for PBIA when it was conceived in the early 1990s. At that time, about one-third of the aircraft operating at the Airport were commercial jet airliners and most of the other aircraft were small propeller airplanes. In order to reduce congestion and improve safety, the County embarked on a concerted plan to encourage small general aviation aircraft to relocate from PBIA to North County. Beginning in the 1990s, the mix of aircraft at the Airport dramatically changed over a 20 year period from about 60% propeller planes to less than 5% propeller planes. The County did not force any aircraft to move to North County. The County built a new airport that was attractive, with lower costs for services and hangars, and aircraft moved

voluntarily.

North County is located on 800 acres, with an additional 1,000 acre environmental buffer surrounding it. The longest runway at North County is about 4,000 feet, which is too short for almost all jet aircraft, and is also not wide enough or strong enough to support the weight of most jet aircraft. The 2006 Master Plan recommended extension of one runway at North County to 6,000 feet at a cost of only a few million dollars. According to the Master Plan, such a runway is large enough to accommodate more than half of the private jets that now utilize the Airport.

The Boca Raton Airport (“Boca Airport”) provides an instructive comparison. Boca is located on a much smaller site, 204 acres. Boca Airport has a single 6,000 foot runway, which is the same length as the proposed North County expanded runway. Boca Airport had 51,753 annual operations in 2010 (compared to 60,285 general aviation operations at PBIA), most of which are from private jets. Boca Airport has no commercial airline service.

For less than \$10 million, North County could be improved by extending its runway to accommodate small and medium private jets and constructing a control tower.¹⁴ It is reasonable to believe that a significant portion of the current private jet traffic at the Airport would voluntarily relocate to North County because of its location and lower costs. For example, there are no landing fees at North County, but there are such fees at PBIA. Effective November 1, 2008, the County imposed landing fees on private aircraft equal to the rate charged for commercial air carriers. These landing fees were imposed because commercial airliners argued that they were paying substantial

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2 - 43

¹⁴ Boca extended its 30,000 lb. runway by 1,076 feet in 1996 for \$1.4 million. Control towers are not expensive either. Boca Airport built a tower in 2000 \$1.3 million. (Cite)

landing fees, and private aircraft were not paying their fair share, since private aircraft account for about two-thirds of the operations at PBIA. Of course, none of these facts are disclosed in the FEIS.

North County is closer to the burgeoning affluent population of the northern third of Palm Beach County.¹⁵ It is also close to the growing business complexes in that area, including the Scripps biomedical research complex at Abacoa to which the County and the State committed over \$500 million.

Thus, for an expenditure of less than \$10 million, the North County airport could eliminate any possibility of congestion at the Airport and any supposed need to spend hundreds of millions of dollars to relieve that theoretical congestion. Yet the FEIS fails to analyze the benefits of North County expansion. This is inexplicable in light of the County's existing plan for expansion at North County. The County has clearly delayed development of North County because it would render the expansion plan at PBIA unnecessary.

2 - 44

The FEIS's states that the main reason it did not conduct a detailed analysis of expanding North County is the location of the environmental preserve area, the CSX railroad, and State Road 710 surrounding the North County airfield. *See* FEIS at 3-28. However, the FEIS fails to mention that the County itself proposed a runway extension in its October 2006 Master Plan Update for North County, and the FEIS fails to explain how it reached a different conclusion.

2 - 45

IV. The FEIS Plan flunks the cost benefit test.

¹⁵ The 2010 Census Bureau Population Statistics show that the metropolitan areas in the South Palm Beach County only grew 8.4% from 2000 to 2010. In vivid contrast, the key population areas of North County grew 40% in the same time period.

The FEIS has made no attempt to comply with the requirements of the FAA and NEPA to conduct a cost-benefit analysis.¹⁶ The air traveling public will receive no benefit from the conditional approval of plan to address a problem that does not and may never exist. 2 - 46

The FAA's June 2008 FEIS for the Ft. Lauderdale Airport runway expansion is illustrative of the type of rigorous cost-benefit analysis that should have been done in this case. The Ft. Lauderdale FEIS includes a detailed cost-benefit analysis of each of the proposed improvement plans. There is also a detailed breakout of all relevant incremental costs for items such as earthwork, structures, runways, taxiways (parallel and cross field), land acquisitions and facility relocation, and additional O&M costs. It quantifies in dollars (including delay benefits) the annual costs and benefits of each through the year 2030.¹⁷ The Ft. Lauderdale FEIS includes a tenant relocation cost analysis. The PBIA contains no such analysis. 2 - 47

The FEIS states that the cost of the total expansion plan, both long-term and short-term, is \$370 million. That is the only cost number stated anywhere in the FEIS. The FEIS does not even state what portion of this cost is for the Short-Term Project, and what portion is for the Long-Term Project. The FEIS does not break out any of the other

¹⁶ "FAA has long emphasized the need for airport benefit-cost analyses to consider system-wide delay reductions associated with airport investment projects." Addendum to FAA Airport Benefit-Cost Analysis Guidance (June 14, 2010); *see also*, President Clinton's Executive Order 12893, Principles for Federal Infrastructure Investments (January 26, 1994), which requires cost-benefit analysis by federal agencies, and states that such agencies "should encourage the State and local recipients of Federal grants to implement planning and information management systems that support the principles set forth in section 2(a) through (c) of this order"; FAA Airport Benefit-Cost Analysis Guidance (December 15, 1999); NEPA Reg. §1502.23.

¹⁷ *See* Ft. Lauderdale RoD, Table 2 and Appendix F.6, *Net Benefit Analysis*.

categories of costs in the manner that Ft. Lauderdale did. It is impossible to know whether the cost total is accurate or complete. Without cost breakdowns, a cost benefit analysis is impossible. 2 - 48

The \$370 million is stated in 2008 dollars. There is no estimate of inflation through the year 2030, so that the actual cost of the Plan when it might be implemented cannot be determined. 2 - 49

The FEIS also omits to state that there is an additional cost of at least \$100 million to rebuild the two FBOs at Golfview that will be relocated from the south side of the Airport. This rebuilding cost will have to be borne by the FBOs themselves under the terms of their existing leases with the Airport, which give the Airport the right to condemn their existing FBOs without any compensation from the County. Although the County will not bear this cost of more than \$100 million, it is obviously a part of the total cost of the Plan, a portion that will be borne by private business.¹⁸ 2 - 50

In vivid contrast, the Ft. Lauderdale FEIS considered the fact that the alternative for building a second new runway very close to the existing main runway would require the relocation of FBOs from one side of the field to another was considered to be a significant disadvantage to that alternative. Curiously, the FEIS for PBIA does not mention any disadvantage at all from this \$100 million relocation. 2 - 51

The FAA may approve runway expansion “only” if it is “satisfied that . . . enough money is available to pay the project costs that will not be paid by the United States Government under this subchapter.” 49 U.S.C. § 47106(a)(3). The FEIS utterly fails to

¹⁸ For example, Signature leases 33.5 acres, using 20 acres for apron space. Signature has 136,000 square feet of hangar space and 24,000 square feet of other buildings, including its passenger terminal.

meet this requirement because it does not contain a sufficient analysis as to how the County intends to meet the financing requirements for the \$370 Million expansion plan. There are no Joint Project Agreements or any other agreements in place with the State of Florida (*i.e.*, the Florida Department of Transportation) for financing the expansion project. Given the current economic conditions and highly-publicized fiscal problems and budgets cuts of state and local governments, it is unlikely that the State of Florida will ever be able to justify such an astronomical expenditure to the public. The FEIS is also completely devoid of any analysis of whether the Federal government will absorb the costs of a project to address a problem that admittedly does not exist. This is particularly the case in an era when federal and state governments are focused on identifying and eliminate pork barrel projects.

The County intends to raise about \$100 million for this project from ticket charges made to airline passengers, even though it is private jets that create any congestion problem.

The FEIS attempts to justify this huge public expenditure by comparing it to several proposed alternatives, one of which would involve tearing down most of the airline terminal, estimated to cost \$1.8 billion or more. However, superficially comparing a \$370 million project to address a non-existent problem with other exorbitantly priced, but equally non-realistic alternatives (which are obviously concocted as straw men try to prove how reasonable the Plan is), does not meet any fiscally responsible criteria for evaluating the costs versus the benefits of the expansion plan.

No rational and objective analysis could justify spending hundreds of millions of dollars to achieve little or no benefit based on entirely theoretical projections.

V. The Plan Will Have Unacceptable Environmental Impacts.

A. The FEIS does not consider the special status of Mar-a-Lago.

13 - 3

On January 16, 1969, pursuant to the Historic Sites Act of 1935, the U.S. Department of the Interior designated the estate as “The Mar-a-Lago National Historic Site.” The Order of Designation notes that Mar-a-Lago “possesses exceptional value in commemorating or illustrating the architectural and cultural history of the United States. . . .” On July 11, 1979, Mar-a-Lago was designated a landmark property by Resolution of the Town of Palm Beach, pursuant to the Historic Preservation Ordinance of 1979 (which is now codified as Section 54-36 of the Palm Beach Code of Ordinances). Mar-a-Lago was one of the first properties landmarked under the new ordinance. On December 23, 1980, Mar-a-Lago was declared a National Historic Landmark by an Act of the United States Congress. This distinction is reserved for the nation’s most important historic and cultural properties. This designation covers not only the mansion, but the entire 18 acres. There are only 20 buildings in the entire state of Florida that are National Historic Landmarks. Mar-a-Lago is also listed in the United States Department of the Interior’s National Register of Historic Places, and has been declared by the Secretary of the Interior of the United States to be of national significance.

The FAA, as a federal agency, ought to feel a responsibility to protect this national treasure. Instead, the FEIS ignores adverse impacts upon Mar-a-Lago due to pollution from the aircraft directly over Mar-a-Lago. As a result, Mar-a-Lago suffers significant adverse affects from noise and aircraft emissions which must be considered before approving any airport expansion plan..

13 - 4

B. Noise

[One of the statutory missions of the FAA is to minimize current and projected noise impacts of airports from nearby communities. 49 U.S.C. § 47101. Yet, the FEIS gives only a cursory analysis of both the current noise impacts and the projected future noise impacts on the surrounding communities and unique landmarked properties, like Mar-a-Lago.]

3 - 7

[The noise contours used in the FEIS are based on “long-term study” years 1, 2, and 3. *See, e.g.,* FEIS Figure 5.12.1-4. These years are totally hypothetical years. They represent years in which the FEIS projects the Airport will reach certain operational levels. As shown above, there is no way to determine when these years will actually occur. It is impossible to do a valid noise study for a year whose actual date cannot be presently determined.]

3 - 8

[The FEIS fails to address or account for the seasonality of PBIA and the noise impacts which result from increases in private jet traffic during certain segments of the year.] [The FAA’s utilization of Day-Night Average Sound Levels (DNL) as the measure of noise levels created by the Airport is improper. Due to the seasonality of flights at the Airport, DNL should not be used to provide an annual average of noise levels. With large numbers of private jet flights arriving and departing the Airport in the winter months, and with far fewer such flights in the summer months, the unacceptable noise impacts in the winter months are concealed by averaging them with the less intense impacts in the summer. It is a fundamental principle of statistics that averaging data which contains wide fluctuations does not lead to a meaningful statistical result. The FEIS does not address any of these impacts.]

3 - 9

3 - 10

[The DNL methodology also ignores single-event impacts. Using a model which

takes an average measurement of noise levels within a 24 hour period does not properly analyze the effects of single event noise impacts. For example, if there are 100 Piper Cubs which fly over a given point during the day, and several 747s, DNL may show that the “average” level of noise is acceptable.

3 - 11

In addition to the erroneous usage of DNL to measure greatly fluctuating annual noise impacts at the Airport, the use of DNL to measure average daily noise impacts is likewise flawed. The Airport is one of the very few airports its size that imposes a curfew on nighttime air traffic from the hours of 10:00 p.m. to 6:00 a.m. the curfew (a concession that noise impacts do affect the surrounding communities). Given this eight hour period of non-usage, DNL produces a significant inaccurate measure of actual noise impacts. Averaging 8 hours of virtually zero noise with 18 hours of substantial noise produces a misleading measure of the noise during the 18 non-curfew hours. Combining the inaccurate seasonal averages with misleading daily averages compounds the inaccuracy of the “average annual” DNL levels used in the FEIS.¹⁹

3 - 12

The FEIS also fails to address potential changes in fleet mix over the next several decades, and the resulting increased impact from increased use by larger and noisier aircraft including Group IV aircraft for which Taxiway L is to be widened.

3 - 13

The FEIS does not take into account the significant increase in jet air traffic to the east of the Airport that will be caused by eliminating the use of the Diagonal Runway by jet aircraft.

3 - 14

C. Air-to-ground pollution.

¹⁹ The difference between DNL levels increase logarithmically; a 6 to 10 decibel increase in noise is perceived as a doubling of the noise level. One or two point differences in DNL are therefore substantial.

3 - 15

All aircraft produce particle emissions. For at least 15 years, almost all of the jet aircraft that depart from the Airport were vectored in a straight line that leads directly over Mar-a-Lago and other historic and locally landmarked homes in the El Cid, Prospect Park, and Southland Park neighborhoods. Since thousands of jet aircraft have flown in this narrow corridor for many years, it is obvious that the emissions from those aircraft have reached the ground.

[In its comments on the DEIS, Mar-a-Lago referred to a study that it performed in 1995, that showed the existence of emissions on the surface at Mar-a-Lago, and the damage caused to Mar-a-Lago by those emissions. The DEIS reflects that the only consideration given to the study was a single following cryptic comment “Noted”. Otherwise, the FEIS completely ignores that study. This is hardly the proper analysis for a serious problem that is resulting in damage to a national historic landmark.]

5 - 4

[The only analysis in the FEIS of the effects of air to ground contamination is a study that was conducted in 2008. That study measured contaminants reaching the ground at a brief interval at six points around the Airport. The results were averaged, and the results showed that there was insignificant contamination. The FEIS has once again employed the misleading use of averages. Only one of the test sites was in the direct departure flight path that leads east from the main runway toward Mar-a-Lago, which is where most of the air traffic is directed.]

5 - 5

[The FEIS does not include any soil samples that would show the amount of contamination created by years of jet emissions along the departure corridor.]

5 - 6

D. The FEIS is not a “green” project; it is environmentally unfriendly.

[The expansion plan is not an environmentally sustainable program. The FEIS gives only minor consideration of the construction affects of the Near-Term and Long-

Term Plans, while ignoring the ecological impacts of all aspects of the expansion plan. The FEIS does not reflect the level of environmental stewardship demanded in the current economic and ecological climate; it violates sustainability principles.

26 - 47

Under the Plan, two of the three FBOs in the southern border of the Airport will be torn down in order to make room for the completion of the parallel runway. The FEIS fails to address why two perfectly usable, developed FBOs should be demolished, re-located, and then rebuilt from new materials in order to permit the Long-Term expansion project to proceed. It is a waste of resources, public and private, to destroy viable FBO hangars, taxiways and ramp spaces and move them to a new location to accommodate a parallel runway which will not adequately address the potential future delays in air traffic at PBIA.

26 - 48

The FEIS dismisses the environmental problems inherent with the demolition of the existing FBOs by noting that there will be a temporary increase in construction debris. The FEIS does not evaluate the economic impacts of the demolition on the subject FBOs, nor does the FEIS even provide an estimate of the quantities of construction waste which may be generated. The FEIS does not evaluate whether the demolition will result in hazardous waste, or how such hazardous waste will be disposed. Indeed, the FEIS does not even evaluate whether the current waste management resources in Palm Beach County can absorb the demolition materials associated with the FBO relocation, or whether other locales will be required for appropriate waste disposal of hazardous and non-hazardous demolition debris.

7 - 1

The expansion plan is not a “Green” project, and should be rejected.

26 - 49

Conclusion

☐ The Plan should be disapproved. ☐ The Military Trail property acquisition 26 - 50
component of the Short-Term Project should be disapproved. ☐ 26 - 51

SENT VIA ELECTRONIC MAIL TO
PBIA-EIS@URSCORP.COM

March 21, 2011

Mr. Bart Vernace, PE
Federal Aviation Administration
Orlando Airports District Office
5950 Hazeltine National Drive
Citadel International Building, Suite 400
Orlando, Florida 32822

NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®

Law
DEPARTMENT

RE: National Trust Comments on Palm Beach International Airport Final EIS

Dear Mr. Vernace:

The National Trust for Historic Preservation appreciates the opportunity to provide comments to the Federal Aviation Administration (FAA) regarding the Final Environmental Impact Statement (FEIS) for the proposed Airfield Improvement Project (AIP) for Palm Beach International Airport (PBIA).

In general, the National Trust is concerned that the FAA has not taken appropriate steps in its review of the AIP to fully understand and consider all the potential impacts that this project may have on surrounding historic resources, such as the National Historic Landmark property Mar-a-Lago, nor does the FEIS adequately consider the broad range of alternatives available to mitigate any and all potential impacts to these resources.

13 - 5

Interests of the National Trust

The National Trust holds a preservation easement on Mar-a-Lago, a National Historic Landmark, and has a direct interest in preserving and protecting this highly significant historic property, which will be adversely affected by the proposed project. In addition to our direct interest in Mar-a-Lago, the National Trust was chartered by Congress in 1949 as a private charitable, educational, and nonprofit organization to “facilitate public participation in the preservation of sites, buildings and objects significant in American history and culture” and to further the purposes of federal historic preservation laws. 16 U.S.C. §§ 461, 468. The National Trust has traditionally played a unique role as an advocate in the historic preservation field because as a private organization it can respond to enforcement problems from a national perspective. In addition, Congress has designated the Chairman of the National Trust as a member of the Advisory Council on Historic Preservation, the agency responsible for assisting other agencies to comply with Section 106 of the National Historic Preservation Act. See *id.* § 470i(a)(8).

Mr. Bart Vernace
 March 21, 2011
 Page 2 of 5

The FEIS fails to comply with NEPA, Section 106 of the NHPA, and Section 4(f) of the Department of Transportation Act.

- **There is no current or foreseeable purpose and need for the Airfield Improvement Project.**

The FEIS is based on flawed and outdated data. The FEIS acknowledges that air traffic at PBI has fallen below levels that would justify any need for the proposed project, and concedes that the FAA has no way of knowing when the number of aircraft operations at PBI “would again reach the level that previously justified the need for the capacity enhancements improvements” (FEIS ES-15). Simply retaining and parroting the outdated Purpose and Need statement from the September 2008 DEIS is illogical, given the fact that the FAA now knows that the data it used in 2008 did not accurately predict actual activity levels in subsequent years. In fact, the PBI 2006 Master Plan Update (MPU) predicted aircraft operations at 212,804 for 2010 (FEIS Table ES-1); however, the FAA’s 2009 Terminal Area Forecast (TAF) calls for only 138,643 aircraft operations in 2010 (FEIS Table ES-2). In other words, the predictions in the 2006 MPU have already proven to be wrong by approximately 74,000 aircraft operations for 2010—a factor of 35 percent. This glaring disparity between the projections of the 2006 MPU and the 2009 TAF suggests that the FAA should evaluate the AIP at a point in time when aircraft operations show a meaningful potential to grow to levels that warrant consideration of this project.

1 - 100

The updated 2009 Terminal Area Forecast indicates that the number of aircraft operations at PBI may not even return to 2006 levels again until 2030, which is almost 20 years from now. (ES-12, ES-23.)

- **The presentation of information in the FEIS is misleading.**

The FEIS is misleading because there are repeated cross-references to the September 2008 DEIS, which do not reflect the actual need for this project now or even within the next two decades. For example, even though a small footnote is included in FEIS Table ES-3, it gives the impression that aircraft operations at the airport will suddenly exceed the airport service volume during some unknown “Future Year 1.” The reality is that existing aircraft operations and the 2009 Terminal Area Forecast indicate that aircraft operations will not approach the critical 200,000 mark until 2030.

1 - 101

- **FAA’s conditional approval is not appropriate at this point in time.**

26 - 52

Because of the high degree of uncertainty related to the need for the AIP, it is not appropriate for the FAA to issue a conditional approval for the AIP at this time. Any need for such improvements is decades away. Instead, the FAA should require a new EIS that is contemporaneous with an actual need for this project at a time when a full range of updated and accurate data is available that will allow the FAA to provide a

26 - 53

comprehensive and rational review of this project. Based on the FAA's own forecasts, it may well be more than two decades before this assessment would be needed.

- **The FEIS fails to consider the true nature of air traffic at PBIA, and improperly conceals the magnitude of adverse noise impacts by the use of averaging.**

Because of PBIA's unusually high degree of variation in seasonal air traffic, the FAA should not use data that conceals the magnitude of air traffic noise through year-round averaging of sound levels. Instead, the FEIS should disclose and analyze how existing single-event noise impacts affect historic resources in and around the PBIA.

3 - 16

Particular focus should be given to the winter months, when aircraft operations are much greater than during other times of the year. Artificially diluting these impacts through averages does nothing more than conceal the AIP's impact from the public and creates the false impression that any adverse effects to historic resources will be minimal. The use of noise contours, which are based on an average sounds levels, does not take into account the potential adverse effects of existing and future single-event noise impacts on historic resources. By avoiding any consideration of the effect of single-event noise impacts, the FAA denies the public an opportunity to understand how existing or future PBIA aircraft operations may impact historic resources.

3 - 17

3 - 18

The FEIS also fails to consider distinctions between commercial aircraft operations and private aircraft operations in the FEIS. PBIA is unique in that it services a large number of private aircrafts; however, the FEIS provides no distinction for these different types of aircraft operations and does not consider ways in which private aircraft operations might be accommodated at other regional airports at significantly lower costs and with potentially less environmental harm to historic resources.

2 - 52

- **The FEIS ignores evidence that substantiates the adverse effects of aircraft operations on Mar-a-Lago.**

In the early 1990s a number of technical studies were conducted, which documented existing adverse effects on Mar-a-Lago from aircraft operations at PBIA. On November 24, 2008, Neal McAliley of White and Case provided the FAA with comments that summarized the results of these studies and outlined the harmful impacts of current aircraft operations on Mar-a-Lago (FEIS, Appendix K, Letter Code DPO080). It is important to note that these documented adverse effects were not limited to noise, but included damaging physical impacts on the historic structure itself. For example, the 1993 Murphy Study made the following observations and conclusions:

5 - 7

- Commercial aircraft continuously fly over Mar-a-Lago at very low altitudes, creating noise levels between 84 and 94 decibels.

Mr. Bart Vernace
 March 21, 2011
 Page 4 of 5

- Hydrocarbons were found evenly distributed throughout the property and such a distribution is not indicative of a concentrated ground level source.
- It appears that a major cause of hydrocarbon buildup at Mar-a-Lago is caused by aircraft operations over the property at low altitudes.
- Combustion of hydrocarbons, including jet fuel, produces sulfur dioxide and nitrogen oxides, which oxidize in the air to form acid sulfate and acid nitrate.
- Limestone structures at Mar-a-Lago have experienced accelerated deterioration due to the presence of these acids.

These damaging impacts are exacerbated by the fact that for the past 15 years, the County has insisted that virtually all departing flights follow a route to the east that flies directly over Mar-a-Lago, rather than fanning the departure flight paths to disperse and dilute the air traffic and resulting impacts. (In fact, the County's refusal to implement a fanning procedure also significantly exacerbates congestion and delays, because it triples the required wait time between departing flights, in order to avoid dangerous wake turbulence from having flights too close together.)

In response to this information, the FAA merely provided the following response in the FEIS: "Comment noted." The FAA provided no explanation for why it failed to consider this information in its overall assessment of the existing and potential environmental impacts on Mar-a-Lago. It is hard to believe that the FAA would ignore public comments about the documented existing negative effects of air traffic operations from the PBI A on Mar-a-Lago. At the very least, the FAA should consider these studies and provide a thorough analysis of the existing environmental impacts on Mar-a-Lago, and how these impacts could be exacerbated by the implementation of the AIP, including ways in which any potential impacts to Mar-a-Lago could be avoided and minimized. For these reasons, we disagree with the FAA's assumption that approving the AIP would have no adverse effect on Mar-a-Lago.

29 - 11

2 - 53

In closing, the National Trust would like to thank the FAA for its consideration of the National Trust's comments, and the National Trust respectfully requests that its comments be considered and incorporated in the FAA's Record of Decision.

13 - 8

Sincerely,



Elizabeth S. Merritt
 Deputy General Counsel

Mr. Bart Vernace
March 21, 2011
Page 5 of 5

cc: Thomas Cuddy, Federal Preservation Officer, FAA
Reid Nelson, ACHP
Charlene Vaughn, ACHP
Anthony Guy Lopez, ACHP
Scott M. Stroh, III, SHPO
Barbara Mattick, Deputy SHPO
Laura Kammerer, Deputy SHPO



Brian <bgustafson934@aol.com>

03/20/2011 04:49 PM

To "pbia-eis@urscorp.com" <pbia-eis@urscorp.com>

cc

bcc

Subject Against PBIA Expansion

Bart Varnace,

Based on the information reviewed, I am concerned with lack of current statistics. It does not seem that this expansion is necessary nor will there be the air traffic to warrant such cost. I am writing to voice my concerns against this project and hoping in review this project is closed. If the concerns are for the private jets, it seems there are sufficient accommodations further South and North.

1 - 132

2 - 63

In closing, is this a conflict of interest for the you since you were responsible for EIS while working for the URS and now you are analyzing your findings as an FAA employee?

26 - 55

Thank you.

Regards,
Brian Gustafson
934 Paseo Castalla
West Palm Beach, FL. 33405

Sent from my iPad



Lorie Kelley <Lorie.Kelley@hilton.com>

03/21/2011 08:51 AM

To ""pbia-eis@urscorp.com"" <pbia-eis@urscorp.com>

cc

bcc

Subject NO EXPANSION

Please, NO Expansion. I live near Parker between Belvedere and Southern. From the current traffic trends, we do NOT need an expansion. It will be a waste of money and a burden on our neighborhood.

1 - 133

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Memo to: Bart Vernace, PE

From: Mark Kleinfeld, P.O. Box 2203, Palm Beach, FL 33480.

Re: FEIS from Palm Beach International Airport Vol. 76 CFR p. 6510

Please accept the following comments:

Although the EIS separates the Sponsor's proposed project into near term and long term components, the EIS does not address why the no-action alternative cannot be correspondingly distinguished. The no-action section addresses the issue as though a possible scenario (traffic increase) supports a present need for action in terms of conditional approval of the AIP. The no-action alternative analysis is inconsistent with the lack of need determination for runway expansion contained in other sections of the EIS.

1 - 134

The EIS does not adequately address the effect of FAA programs to alter routing, frequency and other characteristics of flights in and around PBIA, either as implemented since the EIS process commenced, or as is presently planned but not implemented, or as may be implemented in the future.

2 - 64

The EIS does not adequately address the issue of "appropriate" NEPA assessment which the FAA might consider in the future for the long term (runway) component of the plan. It does not appear that the treatment of the project as separate components, short term and long term, and how the FAA should approach in NEPA responsibilities in that regard, has been included as part of the scoping process in the development of the EIS or as an issue to be evaluated in the EIS.

26 - 56

The public is unduly burdened by the conditional assessment of the long term aspect of the Sponsor's Plan because it is required to address a long term plan which may never be implemented and is not supported by current data, the EIS does not provide any specific guidelines as to the requirements for the Sponsor to notify the FAA or public that it wants to proceed with the long term plan or what procedures will be utilized by the FAA to notify the public and accept input or decide not to notify the public and not to accept input.

29 - 13

The EIS does not address in manner in which the proposed treatment of the Sponsor's plan will be harmonized with the guidelines in Document No. 5050.4B on supplementing an EIS or how the bifurcated treatment of the Sponsor's project, given the lack of need as to the long term plan, as set forth in the EIS, is authorized under No. 5050.4B or any other law or regulation.

26 - 57

RECEIVED MAR 24 2011

COMMENT FORM

FINAL ENVIRONMENTAL IMPACT STATEMENT

Palm Beach International Airport
Airfield Improvement ProjectDate: March 21, 2011

Please Print

Comments: ☐ AFTER LISTENING TO THE SUPERB PRESENTATION
GIVEN TO OUR NEIGHBORHOOD ASSOCIATION ABOUT THE
AIRPORT EXPANSION, BY DONALD TRUMP'S LAWYER, I WAS
APPALLED THAT A NEW USELESS PARALLEL RUNWAY WAS
EVEN BEING CONSIDERED. PARALLEL RUNWAYS ARE NEVER
USED CONCURRENTLY. ☐ WITH ECONOMIC CONDITIONS AS
THEY ARE GOVERNMENT WASTE MUST BE BROUGHT
UNDER CONTROL. ELECTED OFFICIALS AND THOSE HIRED
TO SPEND TAXPAYERS MONEY ARE GOING TO HAVE
TO LISTEN TO THOSE WHO ARE PAYING FOR THESE
WASTEFUL PROJECTS. ☐

1 - 135

1 - 136

Name: GARY GOODWINOrganization: Prospect Park Monceaux Neighborhood AssocAddress: 317 MONCEAUX RD.
WEST PALM BEACH, FL. 33405
561-655-8706

Comments on the FEIS should be postmarked by March 21, 2011.

Please mail comments to: Mr. Bart Vernace, PE, Assistant Manager, Federal Aviation Administration, Orlando Airports District Office, 5950 Hazeltine National Drive, Citadel International Building, Suite 400, Orlando, Florida 32822. Please feel free to add additional sheets as necessary. You may also e-mail your comments to: pbia-eis@urscorp.com (please include "PBIA FEIS Comments" in the subject line).

Be aware that comments can only be accepted with the full name and address of the individual commenting. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask the FAA in your comment to withhold from public review your personal identifying information, the FAA cannot guarantee that it will be able to do so.

COMMENT FORM™ RECEIVED MAR 24 2011

FINAL ENVIRONMENTAL IMPACT STATEMENT

Palm Beach International Airport
Airfield Improvement ProjectDate: 3-21-2011

Please Print

Comments:

[Opposed to Expansion]

1 - 137

[I have reviewed both sides of this issue and I am shocked that so few people have so much power over our lives, i.e. the airport commission. They have not proved a need, and people with their private planes should not dictate airport policy and waste money.]

1 - 138

Name:

Gael Hammer

Organization:

Prospect Park - Monceaux

Address:

317 Monceaux Rd
West Palm Beachneighborhood
assoc.

FLA 33405

Comments on the FEIS should be postmarked by March 21, 2011.

Please mail comments to: Mr. Bart Vernace, PE, Assistant Manager, Federal Aviation Administration, Orlando Airports District Office, 5950 Hazeltine National Drive, Citadel International Building, Suite 400, Orlando, Florida 32822. Please feel free to add additional sheets as necessary. You may also e-mail your comments to: pbia-eis@urscorp.com (please include "PBIA FEIS Comments" in the subject line).

Be aware that comments can only be accepted with the full name and address of the individual commenting. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask the FAA in your comment to withhold from public review your personal identifying information, the FAA cannot guarantee that it will be able to do so.

Signature Flight Support
Palm Beach International Airport
1500 Perimeter Road
West Palm Beach, Florida 33406
T +1 561 233 8550
F +1 561 478 2633

John "Cy" Farmer
Vice President of Network Development – Americas



March 21, 2011

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

RE: Final Environmental Impact Statement ("FEIS")
for Palm Beach International Airport ("PBIA") dated February 4, 2011

Dear Mr. Vernace:

[Signature Flight Support Corporation ("Signature") is a fixed base operator located on the southeastern part of PBIA. Signature serves a significant portion of the General Aviation ("GA") traffic, which constitutes approximately 65% of the GA operations at PBIA.

Signature supports and has no objection to the Near-Term Airport Improvement Plan project relating to development of future GA facilities in the northwest quadrant of PBIA.

26 - 58

Signature agrees with the FAA that the proposed expansion and relocation of Runway 10R/28L is premature at this time.

Respectfully,

SIGNATURE FLIGHT SUPPORT CORPORATION


John Cy Farmer
Vice President of Network Development – Americas

March 10, 2011

FP0048

Federal Aviation Administration
Mr. Bart Vernace, Asst. Mgr.
Orlando Airports District Office
5950 Hazeltine National Dr., St. 400
Orlando, Fl., 32822

Dear Mr. Vernace,

[Having worked in the financial industry for over 38 years and constantly having to use correct, accurate facts and figures to reach many strategic and important decisions, I strongly feel the same should be done concerning the business actions and proposals for Palm Beach International Airport and all of its operations/ runway/building request matters here in Palm Beach County.] 26-60

[Being a property owner for over 36 years in the Historic El Cid Neighborhood here in West Palm Beach we have of course followed the operations at PBIA over the years and I find that a lot of "so called justifications" have come about by unrealistic and over inflated guess-estimates in the figures column.] 26-61

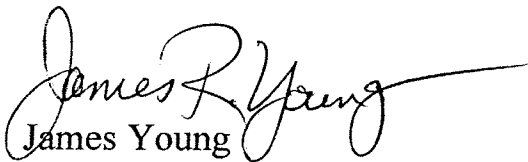
In the business world facts, figures and estimates should not be portrayed unrealistically but of course accurately to justify actions proposed and then taken. [In my opinion I do not find the facts and figures in regards to PBIA projections and the actuality "real" numbers to be at all 'true' in nature and comparison. When PBIA has 2008 showing the LOWEST NUMBER of operations ON RECORD over the past 33 years the figures just indicate there is NO JUSTIFICATION for ANY AIRPORT RUNWAY/ BUILDING- PROJECTIONS or PROPOSALS for many a year to come. If the numbers were there we would be talking an entirely different scenario but they are just not there and have a clear track record of just NOT being there year after year, CONSISTENTLY DECLINING this isn't just something new in these times, this is a CONSTANT !!!!!.] 1-140

[I believe the FAA has a prudent job of using simple common sense - normal guide lines to see when a project is sincerely needed and when it is clearly NOT NEEDED!! There should be total accountability on the Department of 26-62

Airports, otherwise the old phrase that reads, ' FIGURES DON'T LIE, BUT LIARS DO FIGURE' runs rampant and rings true.

[Be realistic, and forthright in your assessments of proposed projects at any Airport making decisions on realistic facts and figures and NOT PIE IN THE SKY fake projections; as the figures and the paper trail simply speak for themselves in this case, especially when you realize we are talking about HUNDREDS OF MILLIONS OF DOLLARS THAT ARE AT STAKE HERE !!] 26-64

[I obviously am against this boondoggle airport runway and building project proposal as it simply is a total waste of funds in this day and time of economic instability, and over these many years it should be noted that I have flown in and out of PBLA on many numerous occasions and know personally of absolutely NO justification for this proposal, believe me I would have picked up on Any need, there just IS NOT ONE!!! I am opposed to granting any type of conditional approval for this baseless request.] Thank you for your consideration. 26-65 26-66


James Young
227 Sunset Rd.
West Palm Beach
Fl., 33401

407- 812- 6978

COMMENT FORM

FP0049

FINAL ENVIRONMENTAL IMPACT STATEMENT

Palm Beach International Airport
Airfield Improvement Project

Date: 3-21-11

Please Print

Comments: My name is Joe Roccia, my address is
924 Omar Rd. West Palm Beach, FL 33405

[I've reviewed the DEIS and can see that the basis for adding the expansion was based on wrong data. I strongly disagree with the expansion.] 1-141 26-67

[The evaluation is unsound, misleading, and a travesty to the FAA and the EIS process.] 26-68

[NO EXPANSION!!!] 26-69

Name:

Joseph Roccia

Organization:

Address:

924 Omar Rd.
West Palm Beach, FL 33405

Comments on the FEIS should be postmarked by March 21, 2011.

Please mail comments to: Mr. Bart Vernace, PE, Assistant Manager, Federal Aviation Administration, Orlando Airports District Office, 5950 Hazeltine National Drive, Citadel International Building, Suite 400, Orlando, Florida 32822. Please feel free to add additional sheets as necessary. You may also e-mail your comments to: pbia-eis@urscorp.com (please include "PBIA FEIS Comments" in the subject line).

Be aware that comments can only be accepted with the full name and address of the individual commenting. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask the FAA in your comment to withhold from public review your personal identifying information, the FAA cannot guarantee that it will be able to do so.

COMMENT FORM

FP0050

FINAL ENVIRONMENTAL IMPACT STATEMENT

Palm Beach International Airport
Airfield Improvement ProjectDate: 3/21/11

Please Print

Comments: _____

[Airport Traffic is down - lower
Traffic does NOT justify expansion] 1-142

[No public ~~outreach~~ outreach why?] 29-16

[Ecology - saving the planet yet
runways are planned for private
aircraft that carry few people - ratio 26-70
of people to fuel is ridiculous.]

Name: ALAN LEVINE

Organization: _____

Address: 114 MURRAY ROADWEST PALM BEACH FL 33405

Comments on the FEIS should be postmarked by March 21, 2011.

Please mail comments to: Mr. Bart Vernace, PE, Assistant Manager, Federal Aviation Administration, Orlando Airports District Office, 5950 Hazeltine National Drive, Citadel International Building, Suite 400, Orlando, Florida 32822. Please feel free to add additional sheets as necessary. You may also e-mail your comments to: pbia-eis@urscorp.com (please include "PBIA FEIS Comments" in the subject line).

Be aware that comments can only be accepted with the full name and address of the individual commenting. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask the FAA in your comment to withhold from public review your personal identifying information, the FAA cannot guarantee that it will be able to do so.

COMMENT FORM

FP0051

FINAL ENVIRONMENTAL IMPACT STATEMENT

Palm Beach International Airport
Airfield Improvement ProjectDate: 3/21/11

Please Print

Comments: [I object to the expansion of Palm Beach 26-71
International Airport runways.] [The FAA's own
data show a continued downward trend in flight 1-143
operations. Delays at PBIA are minimal to the point
that they are a non-issue.] [Without a pressing
or projected need considering airport expansion 1-144
now or anytime in the foreseeable future is
folly and a waste of my hard-earned money.]

[There are numerous other infrastructure needs in
Florida, the country, and Palm Beach county. Certainly 26-72
these planned millions can be spent more wisely.]

Name: Brian Turcotte, P.E.

Organization: _____

Address: 573 Toccoa Road
West Palm Beach, FL 33413

Comments on the FEIS should be postmarked by March 21, 2011.

Please mail comments to: Mr. Bart Vernace, PE, Assistant Manager, Federal Aviation Administration, Orlando Airports District Office, 5950 Hazeltine National Drive, Citadel International Building, Suite 400, Orlando, Florida 32822. Please feel free to add additional sheets as necessary. You may also e-mail your comments to: pbia-eis@urscorp.com (please include "PBIA FEIS Comments" in the subject line).

Be aware that comments can only be accepted with the full name and address of the individual commenting. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask the FAA in your comment to withhold from public review your personal identifying information, the FAA cannot guarantee that it will be able to do so.

COMMENT FORM

FP0052

FINAL ENVIRONMENTAL IMPACT STATEMENT

Palm Beach International Airport
Airfield Improvement Project



Date: 3/21/2011

Please Print

Comments: Re: PBIA-EIS

My husband & I purchased our home in Vedado last April 2010 knowing that the neighborhood had received the Florida Historic Registry and our home is a Contributing Structure. This is what made us decided to purchase our 1st home - As a resident of Vedado of 1 year and 9 years in the City of WPB [I do not see the need for anymore Expansion.] The airport purchased part of the Hillcrest neighborhood next to Vedado and ended up selling it to a college who has started construction of a Sports Field Stadium and City Park. 1-45

[The use of "out-dated" and "stale" EIS's is an operation that is futile and a waste of taxpayer money.] 26-73

[Do not allow PBIA to make any further expansion as it is not needed.] Vedado is now on the Federal Historic Registry - Do not destroy any more Florida historic homes. 1-146 13-9

Name: Tina Laws

Organization: tho

Address: 3814 Paseo Navarra

WPB, FL

33405

Comments on the FEIS should be postmarked by March 21, 2011.

Please mail comments to: Mr. Bart Vernace, PE, Assistant Manager, Federal Aviation Administration, Orlando Airports District Office, 5950 Hazelton National Drive, Citadel International Building, Suite 400, Orlando, Florida 32822. Please feel free to add additional sheets as necessary. You may also e-mail your comments to: pbia-eis@urscorp.com (please include "PBIA FEIS Comments" in the subject line).

Be aware that comments can only be accepted with the full name and address of the individual commenting. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask the FAA in your comment to withhold from public review your personal identifying information, the FAA cannot guarantee that it will be able to do so.

FP0053

March 15, 2011

Federal Aviation Administration
 Mr. Bart Vernace
 Assistant Manager
 Orlando Airports District Office
 5950 Hazeltine National Dr., Suite 400
 Orlando, Florida, 32822

Re: Comments on the FEIS

Dear Mr. Vernace,

[As a property owner for 25 years in the Historic Prospect Park /Southland Park District here in West Palm Beach, I am writing to you to express my extreme opposition to any conditional or any approval for a completely UN-NECESSARY Runway Addition at the Palm Beach County, Palm Beach International Airport.] 26-74

1. [There are very clearly NO CAPACITY PROBLEMS at PBI!!] 1-147
2. [There has been a steady, noteworthy DECLINE OF AIRPORT TRAFFIC since 1976!!!] 1-148
3. [IF there is a true need you build, clearly IF THERE IS NOT A NEED YOU DO NOT BUILD, in this particular case the later is true and quite definable!!!] 1-149

[The FAA has a clear and concise responsibility to respond to clearly 'far-out' proposals by the Department of Airports here in Palm Beach County and to rein in the fictitious appeals and ridiculous proposals by Officials who just want to build and spend without displaying any REAL JUSTIFICATION! OR NEED!] 26-75

[As a person who believes that governmental agencies, as well as our own households should be accountable for budgetary and responsible spending, "whims" like this RUNWAY PROJECT should not be rubber stamped, The Palm Beach Post Newspaper brought forth very clear, concise reasons as to why this RUNWAY should NOT OCCUR and I CONCUR! Do the right thing!!] Lila Young, 26-76
 3120 Washington Rd., West Palm Beach Florida, 33405. Lila Young

Also see 'Palm Beach Daily News' Sun. 2/6/11
 "PBI expansion plan stalls" page A16
 By David Bjelloz, frequent contributor to "Professional Pilot Magazine"

APPENDIX A-3

FAA REPONSES TO FEIS COMMENTS

The comments received by the FAA have been summarized by the FAA into an FEIS Comment/Response Database Report. FAA responses to comments have been prepared and are included in this database report.

Palm Beach International Airport FEIS

1. Purpose and Need

1-1 Comment

I am taking the time to inform you that as concerned and engaged resident of Vedado I oppose the plans for PBIA expansion. It is unnecessary and unwarranted. The fact that there has been a downward trend in air traffic does not reflect the need for this expensive expansion.

Response

The FAA agrees that there is no current need at PBIA for the proposed capacity enhancements, and for that reason has decided to grant only conditional ALP approval of the Long-Term AIP at this time.

Letter Codes

FP0001

1-2 Comment

Your request to maintain the current EIS for future expansion plans is unprecedented. Is It even legal?

Response

The FAA has granted only conditional ALP approval at this time for the Long-Term AIP, an action that could have been taken without any environmental review. Furthermore, the FAA has committed to render no future decision on capacity enhancement at PBIA until the current FEIS has been reviewed and validated, and any necessary additional environmental review and documentation undertaken. That future review and documentation will be circulated for public comment, and a Record of Decision (ROD) issued. Therefore, the commenter's statements are based upon the false assumption that the FAA has selected a long-term airfield capacity enhancement project in the current ROD for unconditional ALP approval. This is not the case.

Letter Codes

FP0001

1-3 Comment

Noise levels, air traffic and age of historic homes will be different in five or ten years from now. Hypothetically, if I were to consult my doctor today about a procedure needed I would not want him to use labs from five years ago. They will be outdated and unreliable. Would you do it? Why would you want to do that to our neighborhoods?

Response

Because of public interest in the proposed airfield development projects at PBIA, the FAA has provided an accounting of potential future environmental impacts associated with the Long-Term AIP or Long-Term Alternative 2 based on the best information currently available. However, the FAA acknowledges that these conditions may change over time. Therefore, when the Airport Sponsor believes that the airfield capacity improvement elements of the AIP are again necessary to reduce operational congestion and delay at PBIA, and approaches the FAA with a request for unconditional ALP approval of the Long-Term AIP, the FAA would review the FEIS to determine the continuing validity of the analyses and undertake any necessary environmental documentation to support a final decision regarding unconditional ALP approval of a capacity enhancement project at the airport.

Letter Codes

FP0001

1-4 Comment

No to the expansion and no to the defer plan to use the EIS later.

Response

Comment opposing the proposed expansion at PBIA and providing conditional ALP approval of the Long-Term AIP is noted.

Letter Codes

FP0001

1-5

Comment

The CCAN [Citizens Committee on Airport Noise] was informed by PBIA administrative staff of their intent of the airport to move forward with selected components of the airport expansion approved by the EIS. Effectively, the cost of the runway expansion will be spread out into several smaller projects in order to make the major expansion project appear less costly. If PBIA is allowed to spend taxpayer money on the preparatory projects meant to pave the way for the runway expansion, adding the new runway will become a fait accompli and a full EIS will not be required.

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 (KPBI) decides to come back with a proposal to move forward with the runway expansion.

Response

The FAA disagrees that consideration of the unconditional ALP approval of the Near-Term AIP is a veiled means to segment the AIP with the purpose to "pave the way for the runway expansion." As discussed in Section 1.1 of the FEIS, the Airport Sponsor concluded, and the FAA agreed, that the Long-Term AIP is not needed at this time. Therefore, the Airport Sponsor proposed that certain components of the ALP be unconditionally approved on the ALP (identified as the Near-Term AIP in the FEIS) and that the remaining projects that were intended to enhance capacity only receive conditional ALP approval following the NEPA process. The Near-Term AIP includes the following projects: development of General Aviation (GA) facilities in the northwest quadrant of PBIA, widening the full length of Taxiway "L" from 50 feet to 75 feet, and acquisition of approximately 13.2 acres of property along the western PBIA property line. The FAA found that the development items included in the Near-Term AIP do not rely for their justification on the proposed Runway 10R/28L expansion project and are, therefore, justified for approval now. The Airport Sponsor has requested the FAA's "unconditional" ALP approval of the Near-Term AIP through this EIS process and the FAA's subsequent findings and determinations in its ROD. Even if the runway expansion component of the Long-Term AIP or Long-Term Alternative 2 were never constructed, the projects contained in the Near-Term AIP and Near-Term Alternative 2 serve valid purposes and meet separate business needs of the Airport Sponsor at this time.

Regarding environmental review of a future request by the Airport Sponsor for unconditional ALP approval of capacity enhancement at PBIA, see response to Comment 1-2.

The FAA acknowledges the Commenter's request to not approve any component of the overall AIP and the request to prepare a new EIS, if and when, the County "decides to come back with a proposal to move forward with the runway expansion."

Letter Codes

FP0002

1-6

Comment

The CCAN was informed by PBIA administrative staff of their intent of the airport to move forward with selected components of the airport expansion approved by the EIS. Effectively, the cost of the runway expansion will be spread out into several smaller projects in order to make the major expansion project appear less costly.

I expressed great concern that these selected projects are solely intended to support the future runway expansion and that, at some undetermined time in the future, the remaining expansion projects will be allowed to commence without the requirement for a new EIS. If PBIA is allowed to spend taxpayer money on the preparatory projects meant to pave the way for the runway expansion, adding the new runway will become a fait accompli and a full EIS will not be required.

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 (KPBI) decides to come back with a proposal to move forward with the runway expansion.

Response

Please see response to Comment 1-5.

Letter Codes

FP0003

1-7 **Comment**

We say no to the airport expansion. What a waste of money when there are a lot of other things the county tax dollars could go towards like our schools.

Response

Comment in opposition to the expansion at PBI is noted.

Letter Codes

FP0004

1-8 **Comment**

I also continue to question the flawed premise that this project is needed in order to reduce future congestion and delays at PBI as airport activity grows. Aircraft operations at PBI have decreased significantly over the last 30 years. PBI 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 PBI is not a new phenomenon caused by the recent "nationwide economic recession" as stated in the FEIS, but is rather a reflection of a pattern of long term declining airplane activity over the last thirty years at PBI caused by a multitude of factors.

Response

The forecasts of aviation activity prepared by either the FAA or the County take into account many factors, and represent the best estimate of the existing and future number of aircraft operations at PBI and at other airports across the country. However, it is important to remember that the forecast are estimates only. Sudden or unanticipated social and/or economic changes at the local community level, as well as at the national level can result in substantial effects to the forecasts.

The forecasts of aviation activity used in the DEIS were prepared in 2005 by the Airport Sponsor and approved for use in the EIS by the FAA in February and May 2006. In contrast to the position as stated by the Commenter, the FAA maintains that the substantial decrease in the forecasts for PBI through the EIS Study Years is largely due to the national recession that began after the start of the PBI EIS process. For the FEIS, the FAA used the 2009 TAF, which is substantially lower than the forecast used in the DEIS. Please see Chapter 1.0 of the FEIS for more information.

Historic Aircraft Operation Levels at PBI

Since the 1980s, the total number of aircraft operations occurring at PBI has decreased. Based on this information, several members of the public who commented on the FEIS questioned the need for additional airfield capacity to accommodate existing and projected levels of aircraft operational demand at PBI. The argument is that the airport has experienced higher levels of aircraft operations in the past without comparable levels of aircraft operational delay and accordingly, there could not have been any delay at 2006 operational levels and there was no need for the proposed Runway 10R/28L expansion component of the Long-Term AIP.

The comment above is based upon the assumption that delay is based solely upon the total number of aircraft operations at an airport. This assumption is incorrect. In fact, delay stems from not only the total number of aircraft operations, but also the type of aircraft operating at an airport, the type of services at an airport, and the configuration of the airfield. The FAA notes that the types of aircraft generating aviation activity at PBI have changed substantially over the last few decades. For instance, production of and activity by light general aviation aircraft peaked in the 1980s, generating the highest levels of historical aircraft operational activity. As the general aviation industry experienced its highest number of entry-level pilots, the associated levels of training and practiced operations in the form of "touch-and-go's" and low-level approaches served to increase the overall number of recorded aircraft operations. For reasons of increased cost of operations and aircraft manufacturer liability, the level of recreational flight activity by these smaller general aviation aircraft have decreased markedly since that time, throughout the nation.

During the five-year period from 1976 through the end of 1980, locally-based small general aviation aircraft operations represented as much as one-third of all general aviation operations at PBIA and as much as 27 percent of all aircraft operations at the airport. To accommodate this increased level of general aviation operations at the airport, the majority of such training operations were conducted on the shorter parallel runway (Runway 10R/28L) rather than the airport's primary Runway 10L/28R. By design, the use of the shorter parallel runway at PBIA served to offer acceptable levels of capacity and helped to minimize aircraft operational delay for all other users on the two other runways at PBIA.

In response to growth trends of general aviation activity in Palm Beach County and at PBIA, the Airport Sponsor developed the North Palm Beach County General Aviation Airport (F45 or North County Airport) in 1996 to accommodate the anticipated continued growth of general aviation activity in the area. Combined with the Airport Sponsor's other general aviation Reliever Airport, Palm Beach County Park Airport (LNA or Lantana Airport), the overall number of general aviation aircraft operations at PBIA has steadily decreased over time to approximately 93,000 operations (2006), down considerably from the high of over 215,000 experienced in 1979. During this same time frame, operations by air carrier, air taxi, and large GA aircraft at PBIA were increasing. For example, the FEIS discloses that in 1980, the number of air carrier operations at PBIA was 50,947 and by 2009, this number increased to 59,140. Likewise, the FEIS discloses that in 1980, the number of air taxi operations at PBIA was 2,263 and by 2009, this number increased to 35,947.

Today, local general aviation operations at PBIA represent approximately 3 percent of all general aviation operations and 2 percent of all operations. The FAA's TAF indicates that the projected relative percentage of local general aviation activity operations at PBIA will remain unchanged throughout the remainder of the forecast period.

From these findings, it can be inferred that the remaining mix of general aviation aircraft operating at PBIA represent the larger "cabin-class" genre of mostly itinerant general aviation aircraft. While these itinerant operations account for more than 60 percent of all aircraft operations at PBIA, the increased need for air traffic control and aircraft in-flight separation, avoidance of wake turbulence and the adherence to the safe and efficient use of the runways and airspace, all serve to produce the increasing need to more efficiently accommodate both general aviation and air carrier operations at PBIA.

In summary, forecasts are not intended to be exact predictions of future conditions. Rather, they are estimates of future aviation activity that are based on and influenced by a wide variety of factors. Even were it possible to prepare aviation forecasts with absolute precision, it is false to assume that delay will be directly proportional to the total number of annual aircraft operations at any particular airport. This is because delay is caused by a variety of factors beyond the raw number of total operations.

Letter Codes

FP0005

1-9

Comment

Even though airplane activity decreased at PBIA for the last three decades at significant rates, the annual future activity forecasts generated by the FAA and by PBIA during that same period continually overestimated future activity at the airport and inaccurately predicted increases in airplane activity. Despite the lack of reliability of the airport activity forecasts, the FAA has indicated through the FEIS that future decisions on the proposed runway expansion at PBIA will be decided by continuing to rely on forecasts that use a methodology that for the last 30 years has continually overestimated future activity at PBIA.

Response

The FAA believes that the calculation of aircraft operational delay at PBIA contained in the FEIS is accurate and correct based on conditions that had been recently experienced at the airport (2001 through 2008). The analysis of aircraft operational delay at PBIA was based on the Airport Sponsor's 2005 forecast for PBIA, which indicated that the number of operations at PBIA after the year 2006 and through the years 2013 and 2018 would result in unacceptable levels of operational delay (4.8 minutes

in 2006, 10.2 minutes in 2013, and 20.6 minutes in 2018) to aircraft operating at PBIA. The delay calculations were developed using SIMMOD™, which is widely accepted technological modeling tool available to analyze potential aircraft operational delay and airport congestion. It is used in FAA's NEPA documents when delay and congestion at airports is an issue. Importantly, the FEIS indicated that capacity enhancements will be considered in the future only when operational levels (actual operations and growth trends at the airport) support the need to plan for capacity enhancements. Also see response to Comment 1-8 for a discussion of historic aircraft operation trends at PBIA.

Letter Codes

FP0005

1-10 **Comment**

I am against any unnecessary expansion of the Palm Beach International Airport.

Response

Comment against proposed expansion at PBIA is noted.

Letter Codes

FP0005

1-11 **Comment**

There is nothing responsible about cramming an expansion down our throats when all the statistics bear out the truth that it is not needed. NO EXPANSION!!!!!!

Response

Comment against the proposed expansion at PBIA is noted. Also, please see response to Comment 1-1.

Letter Codes

FP0007

1-12 **Comment**

Upon a detailed technical review of the Final Environmental Impact Statement for the expansion of Palm Beach International Airport (PBIA), my professional assessment is that PBIA has no capacity problems at this time. In fact there has been a steady downward trend of airplane traffic at PBIA since 1976. The purpose of the proposed expansion is to increase capacity at the airport and to handle more airplane traffic.

Response

Please see response to Comments 1-1 and 1-8.

Letter Codes

FP0008

1-13 **Comment**

Last year (2010) PBIA recorded the lowest number of airplane operations in the last 35 years of operation. Under these conditions the existing airfield infrastructure and geometry do not contribute to congestion and delay. Based upon the FAA's 2009 Terminal Area Forecast used in the Final EIS we will not even reach the 2006 airplane operations, which we started the study out with, prior to the year 2030. The projected growth in aircraft operations at PBIA over time will not increase average annual delay to unacceptable levels as established by the FAA. Based upon these facts the Final EIS should recommend the No-Project Alternative.

Response

Please see response to Comments 1-1 and 1-2 and Section 2.3 of the FEIS.

Letter Codes

FP0008 FP0024

1-14 **Comment**

The study Team is to be commended for the following determinations:

Based on actual aircraft activity records and the FAA's 2009 TAF, the agency has determined that the level of aircraft activity at PBIA does not currently result in unacceptable levels of operational delay.

After the publication of the DEIS, and the review of comments on the DEIS, the FAA determined that a more recent forecast of aviation activity that is representative of the changed conditions at PBI should be used for the FEIS. Subsequently, the FAA decided that, barring a full-fledged Aviation Forecast Update Study by the Airport Sponsor, the agency's own 2009 Terminal Area Forecast (2009 TAF), would be the most applicable forecast of aviation activity for use in the FEIS (see Section ES 3.1 of this Executive Summary and Section 1.2.4 of the FEIS for details on the 2009 TAF).

Response

FAA notes the comment regarding the fact that the Airport Sponsor determined, and FAA agreed, that the airfield capacity enhancement element of the AIP is not needed at the present time.

Letter Codes

FP0008 FP0024

1-15 **Comment**

It is good the study Team acknowledges that the TAF is only a forecast and may not predict the future accurately. It is interesting that the study team is concerned about the TAF erring on the side of not being optimistic enough. We have additional data, the newly published 2010 TAF which indicates that the 2009 TAF erred on being too optimistic. The 2010 TAF shows the 2030 projection is reduced an additional 5% or 10,118 operations in relation to the 2009 TAF. So using the more up to date 2010 TAF actually predicts the airport will realize this justification later than anticipated in the study not sooner. The history of TAF's prepared for this airport have shown that the projections are always optimistic, not the other way around as this study is implying.

Response

The FAA TAF is the agency's accepted tool for forecasting aviation activity for airports across the nation and at PBI. The TAF is updated annually by the FAA, taking into account recent events and trends and revised projections for the future. Future projections consider numerous economic and aviation factors at national, regional, and local levels. The TAF prepared for PBI took into account local and regional trends in predicting aviation activity. The agency's reliance on the TAF and the agency's expertise in the area of aviation forecasting has been routinely recognized and upheld by the courts.

The FAA's Terminal Area Forecasts (2009, 2010, and 2011 (published in January 2012) TAFs) show that future aircraft activity at PBI would likely increase at a modest annual rate when compared to the 2006 Master Plan Update Forecast on which the September 2008 DEIS analyses were based. The 2009 TAF indicates that the level of activity at PBI (approximately 204,054 aircraft operations) that would begin to cause unacceptable delay would be reached around the 2030 time frame. Due to ongoing economic conditions, the 2010 TAF indicates that 204,054 operations may not be reached at PBI until 2034. And based upon the 2011 TAF, 204,054 operations may not occur until 2039. The FAA acknowledges that the current economic recession has reduced the level of aircraft activity at PBI such that the number of aircraft operations at PBI that previously justified the need for the airfield capacity enhancement components of the Long-Term AIP are no longer anticipated to occur within the time frame identified and evaluated in the September 2008 DEIS (Study Years 2013 and 2018). While the FAA's 2009, 2010, and 2011 TAFs predict a modest but steady increase in aircraft activity, it is not yet clear precisely when PBI can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay. It is for this reason that the FAA has chosen to grant only conditional ALP approval at this time for the Long-Term AIP. The FEIS does not imply that the TAF projections for PBI are too conservative. Rather, the FEIS acknowledges that local aviation activity at PBI could recover more slowly or more quickly than predicted in the Agency's 2009 and 2010 TAFs. See response to Comments 1-1 and 1-8.

Letter Codes

FP0008 FP0024

1-16 **Comment**

EIS does not discuss the assumed accuracy of Terminal Area Forecasts. It should be pointed out that even though there is a 35 year trend of actual data showing a drop of operations of 1.7 percent per year the FAA has never projected sustained drops in growth at PBI. If the study were to evaluate the history of PBI TAF's dating back to 2006 and greater they would find that the FAA on average

projects a 1.7 percent growth rate for PBIA even though the actual data continues to decline at a rate of 1.7%.

Response

Since the early 1980s, the number of total annual aircraft operations at PBIA has in fact decreased. This can be attributed to several discrete factors and events, including the decrease in general aviation activity experienced across the nation and at PBIA since the early 1980s; the fact that the Airport Sponsor developed reliever airports for PBIA, which resulted in a shift in local small aircraft activity from PBIA to other airports; the effects of 9/11; and the effects of past economic slowdowns and the recent economic recession. See response to Comment 1-8 for a discussion of historic aircraft operation levels at PBIA. However, since 1980, there have been many periods in which aircraft operations at PBIA increased annually and increased consistent with the growth rates indicated in the FAA's TAFs. Notwithstanding the above factors and events, the airport has maintained aviation activity by air carrier, air taxi, commuter, and large GA aircraft and that moderate, steady growth is a reasonable assumption for the airport. The FAA finds that it would not be reasonable, or responsible, to apply the Commenter's negative trend to future PBIA forecasts with the apparent assumption that future activity levels at PBIA would diminish unabated over time.

Letter Codes

FP0008 FP0024

1-17 **Comment**

If Imaginary "Future Year 2" or Imaginary "Future Year 3" [ed. Commenter is referring to Table ES-3 in the FEIS Executive Summary] is reached prior to 2028 the data will be outside of the cone of forecast consistency. If the data is outside of the cone of forecast consistency all of the assumptions in regard to plane operations for model input in the Airport and Airspace Simulation Model (SIMMOD), the Emissions & Dispersion Modeling System (EDMS), Mobile Source Emission Model, and the Integrated Noise Model (INM) are suspect and not appropriate.

Response

The need for the AIP is thoroughly described in Chapter 2.0, Purpose and Need, of the FEIS. At the time the DEIS was prepared (2006 – 2008), the need for the overall AIP was based on the number of existing operations at PBIA and the forecast of aviation activity that was prepared in 2005 by the Airport Sponsor and approved for use in the EIS by the FAA in February and May 2006. The number of operations experienced at PBIA immediately before the EIS began, and during the time the DEIS was prepared had already resulted in unacceptable levels of aircraft operational delay at PBIA. The SIMMOD™ modeling of the 2006 MPU forecasts for the years 2013 to 2018 showed that delay levels would increase substantially by these years based on FAA airport planning guidance.

In December 2009, the FAA published its updated TAF for airports within the U.S. When compared to the previously approved 2006 MPU forecasts for PBIA, the 2009 TAF showed a substantial decrease in the forecast number of aviation operations at PBIA through the EIS Study Years of 2013 and 2018. It is important to note that this substantial decrease in the number of operations was not isolated to PBIA – it was also forecast for most airports in the country. The primary cause for this unilateral decrease in forecast operations was the economic recession that took place in 2008 and 2009.

Based on the 2009 TAF, the Airport Sponsor made a determination that the proposed Runway 10R/28L expansion project would not be needed as soon as previously thought. As a result, the airfield capacity enhancing components of the overall AIP have been delayed for consideration for unconditional ALP approval until a later time when conditions again warrant them. FAA has provided an accounting of potential future environmental impacts associated with the Long-Term AIP and Long-Term Alternative 2 based on the best information available at the time the FEIS was published. However, the FAA acknowledges that these conditions may change over time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional

ALP approval an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0008 FP0024

1-18 **Comment**

If the model input is not valid the output is not either. There are too many model input parameters to list that would drive up wait times at the airport but plane mix seems to be what the study uses to justify a drop in the Annual Service Volume (ASV) of 16% between Imaginary "Future Year 2" and Imaginary "Future Year 3".

Response

As discussed in Section 2.5.2 of the FEIS, aircraft operational delay levels at PBIA for the then-existing and projected levels of aircraft operational demand (based on the PBIA 2006 MPU forecasts), were calculated using SIMMOD™. SIMMOD™ is an industry standard analysis tool used by airport planners and operators, airlines, airspace designers, and air traffic control authorities for conducting high-fidelity simulations of current and proposed airport and airspace operations. SIMMOD™ takes into account airport-specific conditions that effect taxi times such as runway and taxiway configurations, proximity of runway intersection(s), and local operational considerations. The results of the SIMMOD™ analysis indicated that upon implementation of the Long-Term AIP or Long-Term Alternative 2, the average taxi times for the fleet of aircraft operating at PBIA would be reduced when compared to the No-Action Alternative. Please also see response to Comment 1-121 for a discussion of the projected change in ASV at PBIA.

Letter Codes

FP0008 FP0024

1-19 **Comment**

If by some fluke an unexpected change occurs and the actual operations at PBIA reach imaginary "Future Year 1" operations of 204,054 prior to the year 2022 the forecast consistency would be unacceptable (greater than 15%) which would bring into question the entire EIS and the Record of Decision opening it up for legal challenge.

Response

The argument that "unexpected changes" [increase] in aviation activity occurring in a future year, if 15 percent higher than forecasted for that same year in the Airport Sponsor's 2006 Master Plan forecast, invalidates the EIS and ROD is incorrect. The forecast consistency issue raised by the Commenter was associated with, and limited to, the FAA's approval of the Airport Sponsor's 2006 forecast for use in planning future airport improvements and for evaluating capacity and operational delay in the EIS. In any case, delay issues and the potential impacts associated with the Airport Sponsor's proposed capacity enhancement improvements are associated with levels of activity and not a particular calendar year. If, and when, the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay and the Airport Sponsor requests unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will undertake the appropriate additional NEPA processing. Also see response to Comment 1-17.

Letter Codes

FP0008 FP0024

1-20 **Comment**

The whole analysis seems to point to when the actual operations reach imaginary "Future Year 1" and forecasts project reaching imaginary "Future Year 2" and imaginary "Future Year 3". Does the approval process for the Conditional portions of the process begin when the ASV magically goes down in imaginary "Future Year 3" and the present levels of activity would put us over the threshold of 132,623 operations which is 60 percent of the Imaginary "Future Year 3"ASV? Is the ASV drop still in 2018 or is it some imaginary year yet to be determined? Is the activity the 158,066 operations, which is 60 percent of the existing ASV? Is it when we reach 200,000 operations? Or is it when we reach 204,054 operations?

Response

The FAA disagrees with the basic premise and analysis presented in this comment. ASV simply provides a threshold at which an Airport Sponsor should initiate planning to enhance capacity as the existing airfield capacity may soon be reached and aircraft operational delay, if not already present, can be expected to occur and increase if additional capacity is not provided. In regard to the potential change in the ASV threshold at PBI, see response to Comment 1-121. Table 2.5.1-1 of the FEIS presents the levels of activity that in the past caused, and would likely worsen, aircraft operational delay at PBI. Because of uncertainty of exactly when these levels of activity will again be reached at PBI, the activity levels are identified with currently undetermined future years (i.e., Future Year 2, Future Year 3).

The FEIS discusses the fact that the need for the Long-Term AIP was affected by the economic recession, which occurred during the course of the FAA's preparation of the FEIS. As such, the FAA felt obligated, because of public interest in the project and uncertainty as to when the Long-Term AIP may again be needed, to complete the FEIS and disclose the anticipated environmental impacts of the overall AIP. The FEIS discussion of Purpose and Need for the Long-Term AIP and the evaluation of its alternatives was presented in the FEIS as being relative to the levels of aircraft activity at PBI that previously resulted in unacceptable levels of operational delay at PBI and which formed the basis of the Airport Sponsor's justification for the AIP. This is because aircraft activity levels, not a particular calendar year, would determine the need for capacity enhancements at PBI.

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0008 FP0024

1-21 Comment

This study is technically flawed due to use of Imaginary "Future Years" to evaluate the alternatives which are outside of the domain of the 2009 TAF and its cone of forecast consistency.

Response

See response to Comments 1-20, 2-1 and 26-8.

Letter Codes

FP0008 FP0024

1-22 Comment It is misleading and deceptive in that it acknowledges that there are no problems at this time or in the next 19 years, but it goes on to select an alternative and give conditional approval of that alternative.

Response

The comment asserts that the FAA has "select[ed] an alternative and give[n] conditional approval of that alternative." This is incorrect. The FAA has limited its decision regarding the Selected Alternative to those project components that are currently ripe for decision (Near-Term AIP). With respect to the near-term projects, the FAA has both selected and given unconditional ALP approval to the Near-Term AIP. The FAA has not selected an alternative with respect to the airfield capacity enhancing (long-term) components of either the AIP or Alternative 2. However, based on information currently available, the FAA has identified a preferred alternative (the Long-Term AIP) for the long-term capacity needs of the Airport. Because it is possible that information on which the FAA has relied in the FEIS could change, the FAA is committing to reevaluate the FEIS in its entirety should decision on the long-term projects again be ripe. At this time, the FAA is only granting conditional ALP approval to the Long-Term AIP.

The FAA, as a matter of ordinary business practice, grants conditional approval of Airport Layout Plans (ALPs).

According to FAA Order 5050.4B, paragraph 202.c.(1), conditional ALP approval indicates that:

- a) [t]he proposed ALP depicts features that are safe and efficient for airport operations and airport use.
- b) ARP has not yet completed its review of the environmental impacts the features depicted on the ALP would cause. ARP has not done so because the features are not yet needed or are not ripe for decision. or
- c) [t]he approving FAA official has not authorized the airport sponsor or project proponent to begin building the facilities shown on the conditionally approved ALP. The sponsor or proponent may start building those facilities only after the ARP completes its environmental analysis of those facilities and the approving FAA official issues an unconditional approval of the ALP depicting those facilities.

In terms of the proposed Long-Term AIP, the FAA's review of the 2001 ALP indicates that the proposed project is safe and efficient. In addition, environmental review of the Long-Term AIP is contained in both the 2008 DEIS and the 2011 FEIS for PBI. However, during the preparation of the FEIS, it became clear that the Runway 10R/28L airfield capacity enhancement project would not be needed within the time frame anticipated in the 2008 DEIS (the year 2013). Therefore, the Long-Term components of the AIP are not considered to be ripe for decision at this time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Also see response to Comment 1-2.

Letter Codes

FP0008 FP0024

1-23 **Comment**

I protest the consideration of expanding PBI at this time. The statistics of the past have not been borne out as I understand [sp] the situation and the projections for the future do not appear realistic.

Response

Please see response to Comments 1-1, 1-2, and 1-8.

Letter Codes

FP0010

1-24 **Comment**

Several times throughout the FEIS, the phrase "recent economic downturn" (or a variation thereof) was used to justify the reversal in the Airport Sponsor's request to expand the airfield with a new CSTR. Exhibit: ES 1.2 "... a nationwide economic recession has resulted in a decrease in aviation activity at PBI..."

No one would dispute the validity of that statement ON IT'S OWN MERITS. The recession has impacted every business, household and individual.

However, if you review the overall operations of the airfield over the past 35 years (see chart below), you will note that the airfield has not suffered ONLY as a result of the "recent economic downturn" but rather has been in a continual decline in operations FOR DECADES (green trend line).

Response

See response to Comment 1-8.

Letter Codes

FP0012

1-25 **Comment**

Using the phrase "recent economic downturn" to justify the reversal implies that the long term trend in declining airport operations is a temporary blip, when in fact, IT IS NOT. Statistically, factually, and truthfully, it is not!

Using that phrase also implies that once the recession has ended, the airport sponsor will again be justified in its request for the CSPR. It is not. If the airport didn't need expansion with operations TWICE (1980) that of 2009, then it does not need expansion.

Using this language in the FEIS is misleading at best; a deliberate attempt to hide the long term truth at worst.

This language needs to be corrected/removed prior to the Record of Final Decision is issued by the FAA. The fact is that the Airport Sponsor was asking for something all along that wasn't justified or warranted. The recession is irrelevant.

Response

The FAA does not agree with the premise that at the time the EIS process was initiated there was no justification for the proposed AIP. Please see response to Comment 1-8.

Letter Codes

FP0012

1-26 **Comment**

This piecemeal approach actually will exacerbate the operating conditions at PBIA. All the near-term projects are primarily to benefit GA traffic (i.e. addition of new facilities, expansion of GA taxiways, etc.). This will just encourage MORE GA traffic to an airport that already has too much GA traffic. This increased traffic will in time cause increased delays in take-off times, which will then further justify the need for future runway expansion. It's creating the problem instead of resolving it.

Response

This comment puts forth the argument that the Near-Term AIP will cause new, induced GA activity at PBIA solely on the basis of new or expanded FBO facilities being available. The comment further argues this induced GA activity will ultimately (how far in the future is unclear) cause delay to occur. The FAA disagrees with these assertions for a variety of reasons.

First, the FAA has long maintained, and courts agreed, that not all types of changes on an airport are of a variety likely to induce new users at that airport. For example, courts have upheld the FAA's conclusion that new passenger terminals accommodate existing demand from existing passengers, rather than creating new demand. The FAA's considerable experience in reviewing and supporting airport development has taught the Agency that in the majority of cases, like passenger terminals, new or expanded FBO facilities of the type proposed under the Near-Term AIP typically will not induce growth in aviation activity levels. Also like terminal facilities, at least in some cases, FBO facilities serve the same purposes: they provide a location for aircraft to park, to discharge and enplane passengers, and allow light maintenance and clean-up of the aircraft. These uses are not of a nature to induce aircraft activity.

Furthermore, it is expected that the new or expanded GA facilities would serve much the same purpose as the existing PBIA GA facilities and not introduce different services or activities (e.g., a major maintenance, repair, or overhaul (MRO) station). The existing facilities provide parking, fuel, and light maintenance services for based and transient aircraft. Although some aircraft are flown to PBIA for just maintenance service, many aircraft operators use the FBO services while they conduct business or enjoy leisure activities while in the Palm Beach area.

Second, in addition to the existing demand for GA facilities, the development of GA facilities would also be in response to future demands that may result from the natural growth in activity at PBIA (as projected by the 2009, 2010, and 2011 FAA TAFs). The FAA acknowledges that over time, new aviation-related businesses, including FBOs, may be established at PBIA and that aircraft owners may decide to base their aircraft at PBIA instead of other airports in the region. The TAF is designed to take into consideration this very type of expected growth. The TAF's forecasts are based upon local changes in demographics, anticipated local economic growth, and local demand for aviation facilities in the specific geographic area during the forecast period. The TAF is designed with this growth in mind and in fact assumes that aviation facilities at the airport are available to accommodate those changes. In this way, the TAF is an "unconstrained" forecast, which means it projects activity based upon the assumption that no physical facility limitations exist at an airport to prohibit or constrain the growth that is forecast to occur. With this in mind, the FAA examined the Near-Term AIP to determine whether there would be any additional "induced" activity at PBIA based on the project. The FAA determined that the near-term development of GA facilities is not expected to induce activity, substantially increase the number of based aircraft or number of aircraft operations, or substantially increase the number of passengers at PBIA beyond the growth otherwise predicted to occur in the FAA's TAF. In current economic conditions, the growth predicted by the TAF is believed to be adequate to address any new FBO users.

Expanded GA Facilities and FBO Operations Meets the Needs of Existing FBOs

The conclusion that the new or expanded FBO facilities are unlikely to induce aviation activity is further supported by the goals and objectives expressed by the Airport Sponsor. Instead of being built specifically to attract new aircraft, increase aircraft operations at PBIA, or alleviate a constraint on activity, the need for new facilities is related more to the operating needs of the airport's existing FBOs and their ability to provide an acceptable level of service to aircraft that visit PBIA. Like any business, the airport's FBO advertise and seek new customers, and would continue to do so as new facilities are constructed. However, the construction of new GA aircraft parking apron and hangar space would not necessarily influence an aircraft operator's decision to choose PBIA over another airport in the region. This is because the impact of limited GA facilities at PBIA is placed more on each FBO rather than the aircraft owner. The FBOs, who compete among each other by price and level of service, are faced with increased complexity in ramp operations. The limitations encountered under current conditions may include an FBO moving and parking large, expensive aircraft in hangars and on aprons that are crowded (which increases risk of damage); moving already parked aircraft to adjust parking layouts during peak periods; and not being able to accommodate all requests for covered parking.

An FBO customer would not necessarily be aware of (or care about) these "behind the scenes" issues and, as stated previously, would not necessarily influence the decision to use PBIA or another airport. As stated in the FEIS, many aircraft operators choose to fly into PBIA because of its proximity to local centers of commerce and high-end housing.

GA Facilities Would Be Developed as Demand Dictates

As discussed in Section 2.3.1 of the FEIS, aviation activity at PBIA fluctuates over time in response to economic and market conditions and the travel decisions of the public. The GA facilities are expected to be developed on an "as-needed" basis and in response to natural increase in GA activity at PBIA over time. This is evidenced by the fact that the Airport Sponsor has not informed the FAA of any plans to construct speculative facilities for the purpose of attracting new aircraft operations.

Hypothetical Analysis

Assuming for purposes of discussion (without conceding) that the comment is correct that the development of the Near-Term AIP GA facilities would increase aviation activity at PBIA, it would require an extreme number of newly attracted operations to create a delay concern in the current operating climate. In fact, under current conditions, the levels of new operations required to create delay in the near future is beyond the type of "reasonably foreseeable" analysis required by NEPA. It is

simply too speculative of a concern to warrant quantification or analysis at this time.

Finally, again assuming (without conceding) that the comment is correct and the development of Near-Term AIP GA facilities would increase aviation activity at PBIA, no environmental harm from such induced operations is reasonably foreseeable. The FAA undertook a screening assessment to determine at what level there conceivably could be noise impacts associated with new GA aircraft using the GA facilities.

The FAA's Area Equivalent Method (AEM) was used to determine what hypothetical level of induced GA operation at PBIA would increase the area of the DNL 65 noise exposure contour by at least 17 percent, which would indicate a significant noise impact. It was found that GA traffic at PBIA would have to increase by approximately 50 percent to cause a 17 percent change in the area of the DNL 65 contour. This means that approximately 32,000 new annual GA aircraft operations would have to occur at PBIA as a result of the Near-Term AIP GA facilities to create a 17 percent change in the area of the DNL 65 contour, and thus a significant noise impact. Based on the size and type of proposed GA facilities, and the reasons discussed above, it is unlikely that the development of Near-Term AIP GA facilities at PBIA would induce aviation activity at this level.

Letter Codes

FP0013

1-27 **Comment**

ANY GA improvements need to be done at the GA reliever airport; the one that was created specifically to pull GA traffic away from PBIA. The airport sponsor (the county commissioners: Karen Marcus, Shelly Vana, Paulette Burdick, Steven Abrams, Burt Aaronson, Jess Sanamaria, and Patricia Taylor) need to spend less money "expanding" PBIA and grow the GA traffic capacity at North County Reliever Airport. That's why county money was used to build the reliever airport in the first place. Plus improvements at that facility would be much less expensive to implement versus PBIA. PBIA has the public perception of being a commercial airport. But it's not. It's a GA airport with a little commercial thrown in. It's completely the opposite of all other airports in the country and this needs to be corrected.

Response

Historical PBIA aircraft operational records maintained by the FAA clearly document the effectiveness of the Airport Sponsor's Reliever Airports such as North Palm Beach County General Aviation Airport (F45) in attracting and accommodating a substantial portion of the operations generated by the smaller GA aircraft (i.e., light single- and multi-engine aircraft) that historically were conducted at PBIA. It is unlikely, however, that the basing and operation of larger corporate cabin-class GA aircraft would occur at North County Airport because of the lack of needed runway take-off lengths, support facilities, and desired level of service. Based on the Airport Sponsor's goal to attract and maintain high levels of aviation services to larger GA aircraft users at PBIA, there is no indication that the required improvements to airfield, support facility, or level of service is planned or that such actions will be undertaken to shift aviation activity away from PBIA. The North Palm Beach County General Aviation Airport Master Plan Update describes the environmental setting and development restrictions affecting development at F45. The Development Order restricts airport development within two major environmental preserve areas situated immediately off the east and west ends of parallel Runways 8R/26L and 8L/26R. The location of the preserves and their protection in perpetuity, in conjunction with manmade facilities east of the airport (CSX railroad and SR 710), limit consideration of the extension of either parallel runway beyond their current length.

Letter Codes

FP0013

1-28 **Comment**

Although I have no problems per say with PBIA expanding when growth is accurately noted in real numbers, not projections, I have difficulty agreeing to an expansion using my tax dollars, be they local or federal, when actual airport usage has decreased since the 1980's.

Response

In regard to the use of public funds towards constructing the AIP, the FAA notes that the economic events and recession that have taken place since late 2008 resulted in a substantial decrease in

activity in the national airspace system and at PBIA. As a result, the FAA is not considering unconditional ALP approval of the Long-Term airfield capacity improvement components of the AIP (relocation and extension of Runway 10R/28L and connected actions) at this time. See response to Comment 1-33.

Letter Codes

FP0014

1-29 **Comment**

I request that PBIA not be enlarged until actual numbers show a significant increase in usage. After all, we have 2 other large airports within a 50 mile radius.

Response

Please see response to Comment 1-9. Section 3.3.4 of the FEIS provides a discussion of the use of a supplemental airport as an alternative to the overall AIP. The FAA determined that this alternative would not meet the Purpose and Need for the Proposed Project at PBIA.

Letter Codes

FP0014

1-30 **Comment**

The two imaginary years of traffic levels projected in the DEIS were proved by actual data to be wrong, and which are significantly greater than anything in the domain of the 2009 or 2010 Terminal Area Forecast (TAF), using this as a basis to evaluate the proposed alternatives is fundamentally unsound, misleading, and an abomination of the EIS process.

Response

The “imaginary years” addressed in the comment represent a point in time at which a given number of aircraft operations would again occur at PBIA. These years were used in the FEIS, not the DEIS. Based on the FAA’s most recent Terminal Area Forecasts, the FAA acknowledges that it cannot accurately predict when those operational levels may again be experienced at PBIA. This is of little consequence, however, as environmental impacts at airports are primarily driven by aircraft operation levels and aircraft types, not calendar years. For this reason, the FAA believes that the analysis of the Future Study Years contained in the FEIS portray as accurate a disclosure of expected environmental consequences as can be prepared at the current time. As noted in numerous places throughout the FEIS and ROD, the FAA has no current plans to utilize the FEIS in support of an unconditional ALP approval of the Long-Term AIP or any other capacity enhancement project at PBIA. As further noted throughout the FEIS and ROD, the FAA will ensure that any future decision making regarding the Airport Sponsor’s runway proposal is preceded by appropriate review and update of the FAA’s 2011 FEIS. The FAA has made no attempt to obscure the fact that it cannot predict the timing at which runway enhancements may be needed at PBIA. Nor has the FAA attempted to conceal the fact that it is impossible to know today whether the FEIS contains all the information that will be necessary to render a final decision in the future on Airport Sponsor’s request for implementation of an airfield capacity enhancement project. It is for that reason that the FAA has committed to future validation of the 2011 FEIS based on real-world data and information available when a decision is again ripe, and to undertake any updates to the FEIS necessary to comply with NEPA. Finally, the FAA has committed to public circulation and comment on future environmental documentation related to the Long-Term AIP. For all these reasons, the FAA believes it is a gross overstatement to say that the FEIS is, “fundamentally unsound, misleading, and an abomination of the EIS process.”

The FAA TAF is the agency's accepted tool for forecasting aviation activity for airports across the nation. See response to Comments 1-15 and 1-16 for additional discussion of the TAF.

The need for the overall AIP is thoroughly described in Chapter 2.0, Purpose and Need, of the FEIS. At the time the DEIS was prepared (2006 – 2008), the need for the overall AIP was based on the number of existing operations at PBIA and the forecast of aviation activity that was prepared in 2005 by the Airport Sponsor and approved for use in the EIS by the FAA in February and May, 2006. The number of operations experienced at PBIA immediately before the EIS began, and during the time the DEIS was prepared had already resulted in unacceptable levels of aircraft operational delay at PBIA. The SIMMOD™ modeling of the 2006 MPU forecasts for the years 2013 to 2018 showed that delay levels

would increase substantially by these EIS Study Years based on FAA airport planning guidance.

In December 2009, the FAA published its updated TAF for airports within the U.S. When compared to the previously approved 2006 MPU forecasts for PBIA, the 2009 TAF showed a substantial decrease in the forecast number of aviation operations at PBIA through the EIS Study Years of 2013 and 2018. It is important to note that this substantial decrease in the number of operations was not isolated to PBIA – it was also forecast for most airports in the country. The primary cause for this unilateral decrease in forecast operations was the economic recession that took place in 2008 and 2009.

Based on the 2009 TAF, the Airport Sponsor determined that the proposed Runway 10R/28L expansion project would not be needed as soon as previously thought. Therefore, the proposed Runway 10R/28L expansion project was still included and evaluated in the FEIS as a Long-Term component of the AIP which would only be considered by the FAA for unconditional ALP approval when the number of aircraft operations at PBIA returns to the levels that would result in unacceptable aircraft operational delay and the Airport Sponsor requests the FAA's unconditional ALP approval of the Long-Term AIP. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0015 FP0016

1-31 **Comment**

It was recently written in the Palm Beach Post that the newest information revealing the reduction in air flights supported not only halting the process of PBIA expansion indefinitely but it was my understanding that it was to be terminated altogether at this time and, if things changed, a new study would have to be done. Basing any decisions regarding airport expansion on outdated material is absurd. The economy is so bad that many people have reduced their traveling and travel only when necessary. I, for one, can't afford to go anywhere now or for the past few years - and I am not alone.

Response

See response to Comments 1-3, 1-8, and 1-17.

Letter Codes

FP0017

1-32 **Comment**

I am 200% opposed to any expansion plans for the Palm Beach Airport! And, although I don't know if my neighbors on my block of voiced their opinion I know the 2 homeowners on my east and the 2 homeowners on my west feel the same way.

Response

Comment in opposition to expansion is noted.

Letter Codes

FP0017

1-33 **Comment**

The airport expansion is the wrong use of Palm Beach County taxpayer's money. Do NOT waste our money on this unnecessary project.

Response

Comment in opposition to expansion of PBIA and proper use of taxpayer money is noted. The ROD being issued at this time does not provide a final decision or approve the use of any funds for implementation of capacity enhancements at PBIA. In addition, airport improvement projects are typically funded through airport user fees and revenues. Generally, tax payer funds are not utilized for

airport development projects. Also see response to Comment 25-1.

Letter Codes

FP0018

1-34 **Comment**

I STRONGLY oppose the airport expansion. The data does not support it, and we do not need it. In these days of cutting things that we actually DO need, to expand the airport would be irresponsible.

Response

Opposition of the Proposed Project is noted. See response to Comment 1-1.

Letter Codes

FP0019

1-35 **Comment**

If Gov. Scott's recent decision not to go forward with the high speed railroad makes any sense at all, how can you possibly consider airport expansion when all projections indicated that it is not needed?

Response

See response to Comment 1-1.

Letter Codes

FP0020

1-36 **Comment**

I oppose any expansion of the PBI Airport.

Response

Comment in opposition to expansion of PBI is noted.

Letter Codes

FP0021

1-37 **Comment**

NO Expansion [sic] – (Again)

Response

Comment in opposition to expansion is noted.

Letter Codes

FP0022

1-38 **Comment**

Since the time of the announced expansion project, it seems that all data and information have been manufactured to justify expansion of the facility, when in fact the data proves just the opposite. Instead of increased traffic at the facility, there has been a steady downward trend of airplane traffic at PBI since 1976. Simply because more direct routes and less expensive tickets are available at Ft. Lauderdale and Miami.

Response

See response to Comments 1-8 and 1-9.

Letter Codes

FP0024

1-39 **Comment**

We have no comment on the Short-Term Project, except that the property acquisition on Military Trail should not be approved because it has no use for the Airport unless the new runway is built.

Response

The Airport Sponsor has articulated a near-term objective for land acquisition on the east side of Military Trail that does not rely for its justification on the proposed Runway 10R/28L expansion project and such acquisition is, therefore, justified for ALP approval now. The Airport Sponsor's objective is to acquire sufficient interest in adjacent properties between Military Trail and the existing west airport property line to better secure and define the airport's boundary and/or convert the land to aeronautical use, including revenue-generating use. The FAA acknowledges that several parcels of property located near the Military Trail and Southern Boulevard interchange would need to be acquired for the

proposed Runway 10R/27L Runway Protection Zone if the Long-Term AIP was implemented. However, the properties could be acquired to meet the Airport Sponsor's objectives regardless of the implementation of the Long-Term AIP. Therefore, the FAA concluded that the acquisition of these parcels in particular does not depend on the Long-Term AIP for its justification.

Letter Codes

FP0040

1-40 **Comment**

The statement in the FEIS that the downturn in air traffic was fueled by the "nation wide economic recession" is presented as a statement of fact rather than the conjecture that it is. Aircraft operations at PBIA have decreased significantly over the last 30 years. Even though airplane activity decreased at significant rates, the annual future activity forecasts generated by the FAA and PBIA during the same period continued to overestimate future activity at the airport and inaccurately predict increases in airplane activity. Given the use of data which has not accurately reflected the levels of traffic at PBIA, it is unsound and unwise for the FAA to make future decisions on the proposed runway expansion based on forecasts that are done using on flawed methodology. If the goal is to look at the facts objectively and make decisions based on accurate data, the conclusions in the FEIS should reflect a position that a new EIS should be launched at the time that this downturn in activity begins to change. Only then is there a possibility to objectively and accurately determine what expansion, if any, can be justified.

Response

Please see response to Comments 1-2 and 1-8.

Letter Codes

FP0025

1-41 **Comment**

The FEIS states that the PBIA project will not go forward until such time as there is justification of increased traffic levels. It further states once traffic levels have reached the required threshold, the currently proposed expansion project will be unconditionally approved.

Response

The comment's summary of the content of the FEIS is not accurate. The FAA has clearly stated in the FEIS and the ROD that consideration of unconditional ALP approval for the Long-Term AIP will only occur when activity levels again demonstrate a congestion and operational delay problem at PBIA, and the Airport Sponsor requests the FAA's unconditional ALP approval of the Long-Term AIP. The FEIS and ROD did not state that the Long-Term AIP will *automatically* be unconditionally approved when delay returns. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0025

1-42 **Comment**

As property owners and residents who are directly affected by any and all changes at PBIA we feel that it is of utmost importance that there be a new EIS performed, taking into consideration all data (including ALL environmental impacts such as noise, air and water pollution, and impacts on historic designated neighborhoods/structures) within the five years immediately preceding the request for project approval. To approve a proposed project in 2011, which might not be justified until 2030 is reckless and irresponsible and just bad business planning. While it is acknowledged in the FEIS that there is no hard and fast method to predict air traffic levels for the future with any certainty at this time, it should also be acknowledged that there is no hard and fast method to predict what the environmental

impacts for such a project will be 15 to 20 years from now.

Response

See response to Comments 1-1, 1-2, 1-8, and 1-41.

Letter Codes

FP0025

1-43 **Comment**

While it appears that there is an effort by the FAA to help PBIA avoid paying for another study by giving approval for a project possibly 30 years hence, it is not the role of the FAA to rescue PBIA from their costly mistake of applying for an expansion project for which there was inadequate justification to move it forward.

Response

See response to Comments 1-2 and 1-41. In regard to justification of the AIP at the time it was proposed by the Airport Sponsor to the FAA, please see response to Comment 1-68.

Letter Codes

FP0025

1-44 **Comment**

The approval of the current PBIA Expansion project in phases causes some serious concern by our residents. PBIA has a track record of asking for and receiving approvals from the FAA for infrastructure projects that are done to justify future actions. The I-95 Interconnect (airport entrance/exit at Belvedere Road) was built anticipating future growth and ensuring that the infrastructure was in place for future expansion requests. Those ramps have never gotten the use that would justify the cost outlay for such a project. An additional project expanded the parking garage at PBIA. This is the same garage that has such under use that presently floors are closed and electricity turned off to reduce costs of operation. Clearly this project was not needed. No approvals should be granted for near term or long-term components of the expansion until and only until there has been a new EIS using timely, current and accurate information within the five-year request window.

Response

The FAA had no decision making or Federal action for the I-95 Interconnect project. The FAA carefully examined whether or not approving the revised AIP project through a mixed ALP approval would result in segmentation of the project to avoid full disclosure of impacts or to establish elements of the AIP that would influence future NEPA processing. The FAA found that the development items included in the Near-Term AIP do not rely for their justification on the proposed Runway 10R/28L expansion project and are, therefore, justified for ALP approval now.

The FEIS also states that the Long-Term AIP would be considered by the FAA for unconditional ALP approval only when the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay at the airport, and the Airport Sponsor requests the FAA's unconditional ALP approval of an airfield capacity enhancement project at PBIA. At such future time that this occurs, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

The FAA acknowledges the Commenter's request to not approve the Near-Term and Long-Term components of the AIP until the project is needed and a new EIS is prepared.

Letter Codes

FP0025

- 1-45 **Comment**
We strongly support denying the expansion request from PBI at this time. In the future, any request for expansion should be evaluated at that time, on the merits of justification.
Response
Please see response to Comments 1-1, 1-8, and 1-17.
Letter Codes
FP0025
- 1-46 **Comment**
Please do not approve the PBI airport expansion. We have adequate capacity for the next several years, and it is a waste of taxpayer dollars to move forward with this plan.
Response
Please see response to Comments 1-1, 1-8, and 1-17.
Letter Codes
FP0030
- 1-47 **Comment**
I am writing to express my very strong feelings AGAINST the expansion of PBI. It is unnecessary and a complete and utter waste of money. There is not enough air traffic now, and will not be for the foreseeable [sic] future. If there is a possible need for an expansion several decades in the future, studies should be done at that time to see if it is warranted. Using outdated data will not accomplish [sic] this.
Response
Comment opposing expansion of PBI is noted. Please see response to Comments 1-1, 1-2, 1-8, and 1-17.
Letter Codes
FP0031
- 1-48 **Comment**
Any expansion would be a misuse of funds for an unwarranted and unwanted runway.
Response
Comment opposing expansion of PBI is noted. See response to Comment 1-1.
Letter Codes
FP0032
- 1-49 **Comment**
Please vote no on this expansion. Since 2005 traffic has declined each year. Even if traffic increases it will not reach the level necessary that would require expansion. There is no need for it now, in 5 years, 10 years or 20 years. Let's save the money toward projects that have a more immediate need. Please vote no on this expansion.
Response
Please see response to Comments 1-1, 1-2, and 1-8. The FAA's 2009 TAF suggests that the number of aircraft operations at PBI that previously justified the need for the expanded Runway 10R/28L at PBI may not be reached until 2030. However, if conditions at PBI change such that the Long-Term AIP and its Connected Actions are again justified, based on FAA guidance, at an earlier time frame than forecasted in the 2009 TAF, the Airport Sponsor may request the FAA's consideration of the Long-Term AIP for unconditional ALP approval at such time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0033

1-50 **Comment**

We say NO to the expansion....no way!!!!

Response

Comment opposing the expansion of the airport is noted.

Letter Codes

FP0034

1-51 **Comment**

Your plan that you have in the works is simply not satisfactory to anyone in the Palm Beach, West Palm Beach Area around the ocean and inland waterway.

Response

Comment in opposition to the proposed expansion at PBIA is noted.

Letter Codes

FP0036

1-52 **Comment**

Please do not waste your and our money on expansion at PBIA, it will benefit no one.

Response

Please see response to Comment 1-1.

Letter Codes

FP0037

1-53 **Comment**

I am against the proposed expansion of the PBIA.

Response

Comment against proposed expansion at PBIA noted. Please see response to Comment 1-1.

Letter Codes

FP0038

1-54 **Comment**

I implore you, in the name of sanity, to reject this crazy notion that PBIA needs to be expanded!!!

Response

Comment opposing the expansion of the airport is noted. Please see response to Comment 1-1.

Letter Codes

FP0038

1-55 **Comment**

We don't need it!

Response

Comment opposing the expansion of the airport is noted. See response to Comment 1-1.

Letter Codes

FP0026

1-56 **Comment**

The Ft. Lauderdale FEIS proves the irrationality of the PBIA new runway plan. Ft. Lauderdale analyzed a second east/west runway 850 feet apart from the parallel to the existing east/west runway. Ft. Lauderdale rejected that plan because such a runway would do little or nothing to increase capacity or reduce congestion and delays.

Response

The Purpose and Need for the proposed capacity enhancement projects at Ft. Lauderdale and Palm Beach were different, based on the different needs and objectives of each airport. This resulted in a different range of alternatives considered in each EIS and one cannot compare the benefits of the alternatives between the projects. The reasons stated for the rejection of the 850-foot alternative at FLL

can be found in the FLL EIS. Although it is not necessary to repeat them here, the reasons for the rejection of the 850-foot separation alternative at FLL are not, as implied by the comment, instructive for purposes of determining the best course of action at PBIA. The screening criteria used at FLL to evaluate alternatives do not help identify the reasonable range of alternatives to address the needs at PBIA as discussed in the PBIA FEIS.

Letter Codes

FP0039

1-57 **Comment**

In 1998, Palm Beach County also studied building a new east/west runway parallel and close to the existing runway. The County's analysis concluded that such a runway was impractical and should not be built.

Response

The referenced 1998 Final Environmental Assessment for the extension of Runway 9L/27R at PBIA did not consider building a new closely spaced east/west parallel runway. The EA considered the development of a widely-spaced 10,000-foot runway capable of dual simultaneous independent operations. The FAA does not believe that the purpose and need or the alternatives considered in the 1998 Final EA are comparable in any respect to the purpose and need or the alternatives considered in the FEIS. Furthermore, the widely-spaced parallel runway alternative considered in the 1998 Final EA did not fulfill all of the Purpose and Need criteria established in the EA and it was not considered to be a reasonable alternative for the proposed project.

The Airport Sponsor updated PBIA's Master Plan studies in the 2004 and 2006 time frame. These studies examined the demand, capacity, and delay issues present at PBIA for the 2005 time frame and provided the basis for the Airport Sponsor approaching the FAA with a request to unconditionally approve certain airfield capacity enhancement projects (the overall AIP). The FAA conducted its own independent evaluation, including computer simulation modeling, and reached the same conclusions that the airport was experiencing delay in the 2005 - 2006 time frame and that the delay was expected to worsen over time.

Letter Codes

FP0039

1-58 **Comment**

The new runway is not needed. There are no delays, there never have been, and never will be. I regularly fly into 30 airports. Palm Beach is the least crowded. In 25 years of flying in and out of Palm Beach, I have never had any delays. Even the FEIS projects no delays until after 2030, if ever.

Response

Please see response to Comments 1-1, 1-8, and 1-9.

Letter Codes

FP0039

1-59 **Comment**

If the new runway made sense, I would support it. If it was really necessary to expand the Airport, I would be in favor of it. I have been a proponent of private aviation for a very long time. But I completely oppose squandering public funds on a costly scheme that has no benefits.

Response

The ALP approval sought at this time by the Airport Sponsor does not include the Long-Term AIP; therefore, no public money would be spent for the Long-Term AIP. Capacity enhancements at PBIA will not be considered for unconditional ALP approval until they are justified by operational levels and delay. Regarding the use of public funds, see response to Comment 1-28.

Letter Codes

FP0039

1-60 **Comment**

The FEIS admits that the only possible problem in the distant future is caused by private jets at peak months of the year, on peak days, at peak hours. To spend hundreds of millions of dollars to reduce

such delays is irrational.

Response

The FAA acknowledges the unique and seasonal nature of air traffic activity at PBIA; including the peak Spring vacation season (see Section 2.4 of the FEIS). However, the delay evaluations expressed in the FEIS are presented as annual averages. Whether experienced or expressed as seasonal or annual measures of delay the agency supports efforts by Airport Sponsors to reduce delay and enhance capacity.

The analysis of aircraft operational delay at PBIA was based on the Airport Sponsor's 2005 forecast for PBIA, which indicated that the number of operations at PBIA after the year 2006 and through the years 2013 and 2018 would result in unacceptable levels of operational delay (4.8 minutes in 2006, 10.2 minutes in 2013, and 20.6 minutes in 2018) to aircraft operating at PBIA. The delay calculations were developed using SIMMOD™, which is widely accepted technological modeling tool available to analyze potential aircraft operational delay and airport congestion. It is used in FAA's NEPA documents when delay and congestion at airports is an issue.

Since the publication of the DEIS in 2008, the actual and forecast activity levels at PBIA have declined in response to the downturn in the national economy. The FAA cannot precisely predict exactly when the number of aircraft operations at PBIA will again reach the level that previously justified the need for the airfield capacity enhancement improvements at PBIA (expansion of Runway 10R/28L – the Long-Term AIP). Because of this, the FAA retained the Purpose and Need discussion presented in the September 2008 DEIS for the FEIS as the basis for the Purpose and Need discussion for the overall AIP. This approach is predicated upon trends outlined in the FAA's 2009, 2010, and 2011 TAFs of more moderate, but steady, growth in aircraft operations at PBIA. While the FAA's 2009, 2010, and 2011 TAFs do predict a modest but steady increase in aircraft activity, it is not yet clear precisely when PBIA can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay, such as those that previously existed and were anticipated to worsen. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0039

1-61 **Comment**

Public funds should not be squandered on this unnecessary project.

Response

Please see response to Comment 26-11.

Letter Codes

FP0039

1-62 **Comment**

There is no need for the FEIS and no basis for approving the Plan, because there is no current need for a new runway and no projected need until at least 2030, if ever.

Response

Since the publication of the September 2008 DEIS, a nationwide economic recession has resulted in a decrease in aviation activity at PBIA and changes in the FAA's forecasts of aviation activity for both PBIA and for the national system. As discussed in Section 1.1.2 of the FEIS, the FAA made a determination in 2009 that the year 2006 PBIA MPU forecasts, which were approved by the FAA for use in the September 2008 DEIS, and which were used as the basis for the justification for the Airport Sponsor's overall AIP, were no longer appropriate for use in determining the timing for the

implementation of an airfield capacity enhancement project.

Subsequently, the FAA decided that the agency's own 2009 TAF would be the most applicable forecast of aviation activity for use in the FEIS. After consultation with the FAA, the Airport Sponsor concluded, and the FAA agreed, that when using the number of aircraft operations and the forecast growth rate of aircraft operations predicted in the 2009 TAF, the proposed Runway 10R/28L expansion project would not be needed at PBIA by the initial 2013 implementation year identified in the September 2008 DEIS. Based on this information, the Airport Sponsor proposed to develop the AIP in two components, which are designated in the FEIS as the Near-Term AIP and the Long-Term AIP. The Near-Term AIP includes the following projects: development of General Aviation (GA) facilities in the northwest quadrant of PBIA, widening the full length of Taxiway "L" from 50 feet to 75 feet, and acquisition of approximately 13.2 acres of property along the western PBIA property line. The FAA found that the development items included in the Near-Term AIP do not rely for their justification on the proposed Runway 10R/28L expansion project and are, therefore, justified for approval now. The Airport Sponsor has requested the FAA's "unconditional" ALP approval of the Near-Term AIP through this EIS process and the FAA's subsequent findings and determinations in its ROD.

The Long-Term AIP consists of the primary capacity enhancement component of the overall AIP, which includes the relocation and extension of Runway 10R/28L and its Connected Actions. It is important to note that the Long-Term AIP would be considered by the FAA for unconditional ALP approval only when the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay at the airport. The FAA's 2009 TAF suggests that the number of aircraft operations at PBIA and the resulting delay that previously justified the need for the expanded Runway 10R/28L at PBIA may not be reached until 2030. It is not yet clear precisely when PBIA can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay, such as those that previously existed and were anticipated to worsen at the time the EIS began and the DEIS was published. For this reason the FAA is not considering the unconditional ALP approval of the Long-Term AIP at this time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0040

1-63 **Comment**

The only possible benefit of the Plan is to reduce delays for private jets at peak periods. There are no delays for the public which used commercial airliners, and never will be.

Response

As discussed in Chapter 2.0 of the FEIS, the purpose of the Airport Sponsor's overall AIP is to accommodate existing and forecasted demand for travel within the Palm Beach Service Area with an acceptable level of operational delay at PBIA. The FAA notes that operational delay should be addressed for all users of public airports, not only commercial air carriers.

Letter Codes

FP0040

1-64 **Comment**

The definition of delay is misleading. There is no single definition of acceptable delay; other airports use 6 to 10 minutes. The FEIS uses 4.8 minutes, which deceptively overstates delay by 25% compared to use of 6 minutes.

Response

There is no single standard for determining at what level delay becomes unacceptable. Determining at what point delay becomes unacceptable depends on the individual airport and the airport's role and context in its region and the national system. Therefore, measures of unacceptable delay at one airport may be different at another airport.

The FAA did not use 4.8 minutes as the threshold of acceptable delay in the FEIS. The FAA used a range of 4-6 minutes. The FAA believes that the calculation of existing and future aircraft operational delay that is contained in the FEIS is accurate and correct for PBIA. The FEIS analysis of aircraft operational delay was based on the Airport Sponsor's 2005 forecast for PBIA, which indicated that the number of operations at PBIA after the year 2006 and through the years 2013 and 2018 would result in unacceptable levels of operational delay (4.8 minutes in 2006, 10.2 minutes in 2013, and 20.6 minutes in 2018) to aircraft operating at PBIA. The delay calculations were developed using SIMMOD™, which is widely accepted technological modeling tool available to analyze potential aircraft operational delay and airport congestion. It is used in FAA's NEPA documents when delay and congestion at airports is an issue.

The technical basis for FAA's threshold of 4-6 minutes of delay is described in Section 2.5.2 of the FEIS. As stated in the FEIS, "minutes of delay per aircraft operation has historically been used by the FAA as an indicator of capacity at an airport. As reported to Congress in FAA's NPIAS 2007 – 2011, 'the onset of more rapid growth in delay often occurs when delay is between 4 and 6 minutes per aircraft operation' (FAA, 2006d). Determining when delays are expected to reach 4 to 6 minutes per aircraft operation is a critical factor in determining when airport capacity enhancement improvements should be considered." The Airport Sponsor's 2006 MPU for PBIA included estimates of then-current and future levels of aircraft delay at PBIA. Estimates of aircraft delay at PBIA were independently evaluated and validated by the FAA in the September 2008 DEIS, for Study Years 2006, 2013, and 2018. The FAA's evaluation indicated that the existing airfield configuration at PBIA would not be able to accommodate then-projected levels of aircraft operations without experiencing levels of average aircraft operational delay greater than 4 to 6 minutes. It should also be noted that the relationship of delay to capacity is exponential rather than linear. This means that when aircraft operational demand has reached an airport's capacity, any further increases in demand leads to disproportionately higher levels of average aircraft operational delay. Therefore, it is important for an airfield to be capable of accommodating peak hour aircraft operational demand so that unacceptable levels of associated aircraft operational delay are not incurred.

Letter Codes

FP0040

1-65

Comment

"Peak periods" is not defined or explained. What months? What days? What hours?

Response

The FAA's use of "peak periods" is not intended to represent a specific time period (e.g., month, week, or day). Peak periods referred to in the FEIS consist of any time that the number of aircraft operations occurring at PBIA results in increased aircraft taxi times or arrival or departure delays. The analysis of capacity and delay in the FEIS used more definitive metrics, including peak hour operational capacity and peak hour demand. The FAA acknowledges that aircraft operations at PBIA can vary substantially not only throughout the day, but on an annual basis. The analysis of delay did consider peak periods, such as Peak Month Average Day.

Peak hour operational capacity is considered to be a critical factor in an airport's ability to provide and maintain a high degree of operational efficiency and customer service, particularly at airports providing scheduled commercial service. An airport's calculated hourly capacities vary due to multiple factors, including but not limited to aircraft fleet mix, ATCT rules, and a variety of other factors that may impact operational capacity. To further evaluate the need for airfield improvements at PBIA, the Airport Sponsor generated estimates of its hourly operational capacities.

"Peak periods" of activity for the existing airfield configuration at PBIA were calculated using FAA AC

150/5060-5, the weighted average hourly capacity of the existing airfield configuration at PBI and SIMMOD™ (rolling) peak hour operational demand modeling assumptions. This measure of peak hour capacity revealed that the existing airfield configuration would have a weighted average hourly capacity of 64 peak hour aircraft operations. As shown in Table 2.5.1-2 of the FEIS, when comparing the projected number of rolling peak hour aircraft operations (operational demand) against the calculated weighted peak hour capacity of the airfield at PBI, it is evident that PBI'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 PBI reach the levels shown in FEIS.

Letter Codes

FP0040

1-66 **Comment**

There is no data showing actual delay at present or at any time in the past, because the historical data destroys the attempted justification for the Plan.

Response

Please see response to Comment 1-8.

Letter Codes

FP0040

1-67 **Comment**

The delay forecasts are invalid because they do not take into account:

1. Planned technological improvements in FAA air traffic control.
2. The continuous trend of the airlines to use larger aircraft so that more passengers can be carried in fewer planes.
3. Delays caused by congestion outside the Airport such as congestion at other airports which have substantial delays, such as LaGuardia.
4. The projected growth of Ft. Lauderdale International, whose market area overlaps that of PBI.

Response

As discussed in the paragraphs below, each of the issues identified in Comment 1-67 were evaluated by the FAA in both the 2008 DEIS and the 2011 FEIS in determining the purpose and need for the proposed overall AIP and/or in the alternatives screening process.

1. The FAA considered recent improvements in the airspace serving south Florida (also known as the Florida Airspace Optimization) and considered technological improvements, such as NextGen. Now, and during the preparation of the FEIS, several technologies (i.e., required navigation performance (RNP) procedures) were available or in use at PBI. While the technologies associated with NextGen provide many benefits to the nation's Air Traffic Control system as a whole, these technologies do not directly provide the needed flexibility and increased airfield capacity offered by the proposed use of dedicated single arrival and departure streams to two separate, but closely-space parallel runways at PBI.

2. Projected fleet mix changes at PBI and the potential impact on operational delay was analyzed in the Airport Sponsor's Master Plan and reviewed by the FAA and discussed in the DEIS and FEIS. The ASV for the existing airfield was calculated to be 263,444 annual operations (FEIS, CH2M Hill, 2006a). Over time, however, changes in the type and size of air carrier aircraft operating at PBI would serve to decrease the calculated estimate of ASV to a value of 221,039. This reduced ASV capacity is primarily related to the planning assumption that the number of larger-sized commercial service aircraft providing scheduled air carrier service at PBI would increase between 2006 and 2018. This assumption was considered by the FAA to be reasonable, and is based on industry trends and not on the implementation of the AIP at PBI. The larger aircraft would have wider wingspans, longer lengths, and heavier weights than the aircraft currently operating at PBI. This increased number of larger aircraft, when operating concurrently with other smaller aircraft, would require that the FAA's ATCT

implement arrival and departure procedures that may include, but would not be limited to, increased en-trail separation distances and the “metering” of aircraft arrivals and departures, both of which are based upon the avoidance of aircraft-generated wake turbulence. With the use of these types of ATCT procedures, slight decreases in the overall number of hourly aircraft movements (i.e., landing or departure) have been, and may again be, experienced at PBIA, thereby effectively decreasing the overall ASV capacity of the airfield. It is for this reason that the ASV for the existing airfield was projected to become slightly lower over time. It should be noted that the number and type of larger-sized commercial service aircraft projected to operate at PBIA would be the same for the No-Action Alternative, the Airport Sponsor’s proposed AIP, and any other reasonable alternatives at PBIA.

3. Delay experienced by aircraft operating at PBIA can be generated by other factors, including, but not necessarily limited to, adverse weather, “gate holds” at hub airports, and airspace utilization. However, aircraft operational delay that was experienced at PBIA prior to the recession was predominantly caused by the airports runway configuration and the unique fleet mix of aircraft using the airport.

4. FLL is located approximately 45 miles south of PBIA. During non-peak driving times, travel between these airports takes approximately 50 to 60 minutes, while during peak travel times, the trip can take longer. The FAA has recently completed the NEPA process for capacity improvement projects at FLL that will enable the airport to accommodate its future demand levels and reduce operational delay. The improvements at FLL are intended to complement, not replace, the AIP at PBIA or the other capacity enhancement projects at airports in the South Florida region. The passenger travel time and traffic conditions from the PBIA commercial service and GA market area to FLL is beyond the distance and time threshold that most passengers and private/business pilots would be willing to travel. Therefore, the use of FLL as a supplement to PBIA would not shift enough operations from PBIA to FLL to enable PBIA to accommodate the operational levels identified in the FEIS or reduce operational delay to acceptable levels.

Letter Codes

FP0040

1-68 Comment

An objective analysis of the Plan shows that the new runway is never going to be necessary, and should not receive any approval from the FAA, conditional or otherwise.

Response

When the Airport Sponsor approached the FAA in 2006 with a request to unconditionally approve airfield capacity improvements depicted on its ALP, the FAA reviewed the Airport Sponsor’s data, studies, and assertions that the airport was experiencing unacceptable levels of aircraft delay. The FAA conducted its own analyses and discussions with the PBIA ATCT that indicated that the airport was experiencing delay. Subsequent to the publication of the DEIS in 2008, the actual and forecast activity levels at PBIA have substantially declined in response to the downturn in the national economy. While the FAA’s 2009, 2010, and 2011 TAFs predict a modest but steady increase in aircraft activity, it is not yet clear precisely when PBIA can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay, such as those that previously existed and were anticipated to worsen. When the Airport Sponsor believes that the airfield capacity improvement elements of the AIP (Long-Term AIP) are again necessary to reduce operational congestion and delay at PBIA, and approaches the FAA with a request for unconditional ALP approval of the Long-Term AIP, the FAA will determine if the Airport Sponsor’s request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of the Long-Term AIP. The FAA’s future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD. The FAA believes that conditional approval of the portion of the ALP depicting the Long-Term AIP in the interim is appropriate at this time. Conditional ALP approval signals that: 1) the proposed features are safe and efficient, 2) environmental review is not completed or the features are not yet ripe for decision, or 3) the FAA has

not approved the Airport Sponsor to begin building the facilities shown on the conditionally approved ALP.

Letter Codes

FP0040

1-69 **Comment**

The acquisition of properties in the southwest corner of the Airport of only one purpose, which is associated with the new runway, and should likewise not receive any approval because it is not independent from the new runway plan.

Response

The Airport Sponsor has articulated a near-term objective for land acquisition on the east side of Military Trail that does not rely for its justification on the proposed Runway 10R/28L expansion project and such acquisition is, therefore, justified for approval now. The Airport Sponsor's objectives is to acquire sufficient interest in adjacent properties between Military Trail and the existing west airport property line to better secure and define the airport's boundary and/or convert the land to aeronautical use, including revenue-generating use. The FAA acknowledges that several parcels of property located near the Military Trail and Southern Boulevard interchange would need to be acquired for the proposed Runway 10R/27L Runway Protection Zone (RPZ) if the Long-Term AIP was implemented. However, the properties could be acquired to meet the Airport Sponsor's objectives regardless of the implementation of the Long-Term AIP. Therefore, the FAA concluded that the acquisition of these parcels in particular do not depend on the Long-Term AIP for their justification.

Letter Codes

FP0040

1-70 **Comment**

The FAA's updated 2010 forecasts, which the FEIS ignores, predict fewer operations - 190,471 - in 2030. See FAA APO TAP Detail Rept. for PBI (issued Dec. 2010). In short, demand projections are trending downward, and the Airport is not forecast to meet the delay threshold of 204,504 operations.

Response

The 2009 TAF indicates that the level of activity at PBI (approximately 204,054 aircraft operations) that would begin to cause unacceptable delay would be reached around the 2030 time frame. Due to ongoing economic conditions, the 2010 TAF indicates that 204,054 operations may not be reached at PBI until 2034, while the 2011 TAF indicates these operational levels may not occur until 2039.

As noted in the comment, the 2010 TAF was released by the FAA in draft form during December 2010. During this period, the technical analyses and data interpretation associated with preparation of the FEIS was complete, and the document was being printed in anticipation of a January 2011 publication date. However, prior to final printing of the FEIS, the FAA did review the forecast for future operations at PBI as presented in the 2010 TAF. Again, as noted in the above comment, the 2010 TAF forecast operations at PBI in 2030 to be approximately 190,471 as compared to the estimate of 204,504 operations previously forecast in the Airport Sponsor's 2006 forecast. This represents a difference of approximately 7 percent with respect to total operations.

The FAA's 2011 TAF was issued in January 2012 as this Record of Decision was being prepared. The 2011 TAF forecast 2030 operations at PBI to be approximately 180,041 as compared the estimate of 204,504 operations previously forecast in the Airport Sponsor's 2006 forecast. This represents a difference of approximately 14 percent with respect to total operations.

Based on a careful review of the 2009, 2010, and 2011 TAF's data, the FAA determined that the small difference in the forecast of total operations in 2030 would not significantly change the results of the technical analyses contained in the FEIS and, therefore, reanalysis of data contained in the FEIS was not warranted. Please see response to Comments 1-68 and 1-62.

Letter Codes

FP0040

1-71 **Comment**

The Airport declares on its website that it is a "congestion free" airport, and has said the same thing since at least 2005. Yet Mr. Pelly's letter to the FAA dated January 6, 2010, says the Airport experienced "intense congestion and delays" as recently as 2007. The FEIS contains absolutely no historical data to support Mr. Pelly's deceptive statement.

The lack of congestion is confirmed by the fact that the Airport does not meet the FAA's definition of a "congested airport."

Response

A review of the web page cited by the Commenter indicates that the Airport Sponsor may, in fact, appear to be referring to its modernized terminal facilities and not the airfield. A quote from the subject web page (accessed on April 5, 2011) is as follows: "On October 23, 1988, a new state of the art terminal building was dedicated and exists as a truly superb example of a user friendly, congestion free, modern airport. PBIA has 28 aircraft gates with the potential for 24 additional gates at a later time."

The FEIS presents data for aircraft operations at PBIA (see Chapter 1.0 and Appendix A-6 of the FEIS). The FEIS also contains the results of independent simulation modeling conducted by the FAA and references to the Airport Sponsor's analyses, both of which indicated aircraft delay at PBIA at the time periods analyzed. The FEIS also references other studies, such as FACT and FACT2, which evaluate congestion and delay at the nation's airports, including PBIA.

An airport is considered a "future congested airport" if it meets the defined threshold in the FAA Future Airport Capacity Task 2 (FACT 2) report, or a later FACT report when issued. Although PBIA is not listed in Table 1 of the 2004 Airport Capacity Benchmark Report, PBIA is listed in the FACT 2 report under "Airports and Metropolitan Areas Needing Additional Capacity in 2015 if Planned Improvements Do Not Occur." What this means is that at the time the FACT2 report was issued, PBIA would have been listed as a congested airport if the proposed capacity enhancement portions of the overall AIP had not been planned.

Letter Codes

FP0040

1-72 **Comment**

Although there is no need for current or forecasted expansion, the County nevertheless requested that the FAA "conditionally approve" its plan for a new runway, so that the Plan can be activated as soon as the County can conjure up future forecasts which project unacceptable delay (as shown below, the definition of delay in the FEIS is also invalid.) The FEIS concedes that it is not possible to project when the Airport will reach a sufficient level of operations to create "unacceptable" delay. See FEIS at ES-15.

Response

This comment appears to assume that conditional ALP approval allows the Airport Sponsor to construct the runway component of the project as soon as "future forecasts . . . project unacceptable delay." This is a misreading of the FEIS and the intent and effect of a conditional ALP approval. Please see response to Comment 1-22, and Section 3.2.2 of the ROD for a complete description of the purpose and effect of the conditional ALP approval granted in the ROD.

The need for the proposed AIP and the proposed AIP's implementation schedule were affected by the economic recession, which occurred during the course of the FAA's preparation of the FEIS. The Long-Term AIP would be considered by the FAA when the Airport Sponsor believes that the airfield capacity improvement elements of the AIP are again necessary to reduce operational congestion and delay at PBIA, and approaches the FAA with a request for unconditional ALP approval of an airfield capacity enhancement project at PBIA. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a

final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

The FAA's 2009 and 2010 TAFs show that future aircraft activity at PBI would likely increase at a modest annual rate when compared to the 2006 Master Plan Update Forecast on which the September 2008 DEIS analyses were based. The 2009 TAF indicates that the level of activity at PBI (approximately 204,054 aircraft operations) that would begin to cause unacceptable delay would be reached around the 2030 time frame. Due to ongoing economic conditions, the 2010 TAF indicates that 204,054 operations may not be reached at PBI until 2034 and the 2011 TAF indicates that 204,054 operations may not be reached until 2039.

Letter Codes

FP0040

1-73

Comment

The FEIS completely ignores historical data showing actual delays, because the actual data would be fatal to the Plan. In 1998, there were 193,091 operations, and less than a minute of delay. See 2001 Strategic Master Plan Study (PBI) (Sections II & IV). In 2001, total operations at the Airport were 212,640. In that same year, the Airport stated that the Airport's "existing facilities are adequate to serve current demand types and levels." Strategic Master Plan 2001, page ES-8. The FEIS does not explain how the Airport facilities will ever be inadequate, when there are fewer operations today (140,348 in 2010) and fewer projected in 2030 (190,471).

Response

The FAA notes that the Commenter refers to and paraphrases the Airport Sponsor's Executive Summary of the 2001 Strategic Master Plan Study. However, the quote is taken out of context. The Executive Summary document referenced by the Commenter actually states that "In fact, the capacity of the existing facilities is generally adequate to serve near-term demand growth as projected under the Baseline Scenario. More aggressive changes in the type or level of demands experienced at the airport, relative to historic trends, may require facilities development to increase capacity." The Executive Summary goes on to point out that in order to accommodate future growth, elements of the Composite Development Plan must be implemented. The Composite Development Plan consists of a series of airside and landside improvements to meet the long-term capacity needs of the airport.

Looking solely at the number of aircraft operations is not the only indicator of delay. Other factors such as fleet mix, peaking characteristics, and time of day also play a major role in the calculations of delay. The FAA notes that since the 2001 Strategic Master Plan Study was published, changes in the type and demand of aircraft activity occurred at PBI. This was primarily due to regional economic growth, population growth, and the real estate boom of the mid-2000s. These factors led to the increase in the number of large general aviation aircraft using PBI, which necessitated the need to enhance capacity at the airport. Please see response to Comment 1-8 regarding historical operational data at PBI.

The 2005 and 2006 Master Plan Update studies examined the demand, capacity, and delay issues present at PBI at the 2005 time frame and provided the basis for the Airport Sponsor approaching the FAA with a request to unconditionally approve certain airfield capacity enhancement projects. The FAA conducted its own independent evaluation, including computer simulation modeling, and reached the same conclusions that the airport was experiencing delay in the 2006 time frame and that delay was expected to worsen over time. In addition, the FAA's assessment of future airport capacity was also documented in a 2004 report titled *Capacity Needs in the National Airspace System: An Analysis of Airport and Metropolitan Area Demand and Operational Capacity in the Future*. In the report, PBI was identified as an airport that needed additional capacity by 2013 to accommodate forecasted demand. Another study, known as FACT2, updated the 2004 study. The updated FACT2 study also identified PBI as an airport that would require additional capacity by 2015, if planned improvements (such as the overall AIP) did not occur.

The Commenter states that the FEIS does not explain how the airport facilities will ever be inadequate when there are fewer operations today (2010) and fewer projected for 2030 than that which occurred in

1998 or 2001 (for which Master Plan studies did not indicate unacceptable delay at PBIA). The FEIS discusses the fact that the economic recession has reduced the number aircraft operations at PBIA since 2008 and that an airfield capacity enhancement project would be considered by the FAA for unconditional ALP approval in the future only when unacceptable levels of aircraft operational delay again occurs at PBIA.

Letter Codes

FP0040

1-74 **Comment**

There is no present need for the Long Term Project, there never has been, and never will be. There is no reliable forecast of any need until some unknown and unknowable time in the distant future. Therefore, there is no need to study the airport runway expansion now, let alone approve a plan.

Response

The Long-Term AIP consists of the primary capacity enhancement project component of the AIP, which is the relocation and extension of Runway 10R/28L and its associated Connected Actions (see Section 1.3.2 of the FEIS). It is important to note that the Long-Term AIP would be considered by the FAA for unconditional ALP approval only when the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay. The FAA described the reasons that it decided to proceed to an FEIS and to issue a ROD in Section 3.4 of the ROD.

Letter Codes

FP0040

1-75 **Comment**

Predicting future operations at the Airport has been historically unreliable. For example, the forecast used in the 2008 DEIS projected that there would be 212,804 operations at the Airport in 2010. But the actual number of operations for 2010 was 141,387. Thus, the 2008 forecast only two years into the future was off by 35%. If a two-year forecast is so inaccurate, a 20 year forecast is meaningless.

Response

The Airport Sponsor's forecast, which was approved by the FAA for use in the EIS, was prepared in 2005. At that time, the Airport Sponsor and the FAA could not have predicted the national recession that started in 2008 and the effect that the recession had on aviation activity on a national level and at PBIA. Also see response to Comments 1-15 and 1-16.

Letter Codes

FP0040

1-76 **Comment**

The only conceivable "need" for the proposed runway is to reduce theoretical peak time delays caused by private jets that may occur far in the future. The Plan would cost hundreds of millions of dollars, and the only benefit would be to the very few people who fly on private jets. The FAA should not approve a plan that does not fit its mission of providing benefits to the general public.

Response

As discussed in Chapter 2.0 of the FEIS, the purpose of the proposed expansion is to accommodate existing and forecasted demand for travel (annual, seasonal, and peak periods) within the Palm Beach Service Area with an acceptable level of delay at PBIA. The analysis of delay, using both ASV and SIMMOD™, at PBIA took into account all aircraft using the airport. Because many different types of aircraft use the airport and contribute to, and are adversely affected by delay, the FAA deemed it reasonable and appropriate to evaluate delay associated with all aircraft types operating at PBIA. Please see response to Comment 1-28 regarding the expenditure of public funds and comments 1-2 and 1-22 regarding FAA's conditional ALP approval of the Long-Term AIP.

Letter Codes

FP0040

1-77 **Comment**

Airport [PBIA] is unique because commercial airliners account for only one-third of the aircraft operations at the Airport. At Ft. Lauderdale, private jets are only about 20% of total operations. The FEIS delay analysis ignores the fact that if the Airport reduced private jets to 20% of total operations,

airline operations could more than double, from 33% to 80%, without any increase in total operations.

Response

The FAA does not have the authority to direct or place influence upon general aviation aircraft operators to shift their activity and services from one airport to another or to operate at specific times of the day. Although the Airport Sponsor may have the authority to designate specific airports within an airport system as commercial service only, in this instance the other airports in the system do not provide adequate facilities for the types of large general aviation aircraft using PBIA. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the general aviation fleet that operates at PBIA or any other public use airport.

Letter Codes

FP0040

1-78 **Comment**

The FEIS purports to address two problems: hypothetical future delays during "peak periods," and hypothetical future annual average delays. See FEIS at ES 2.4.1 and ES 2.4.2. However, a careful reading of the FEIS reveals that the only purpose of the Plan is to reduce hypothetical future "peak periods" delay for private jets. But the FEIS does not ever say what "peak period" means.

Response

The purpose of the Long-Term AIP is to address anticipated future insufficient annual and hourly capacity at PBIA resulting from the existing runway configuration and to reduce anticipated future projected levels of aircraft operational delay resulting from the existing runway configuration at PBIA. Aircraft operational delay at PBIA, as with many other airports, occurs during peak periods, including, but not limited to, daily peaks and seasonal peaks. The FEIS provides data and a discussion of both airport capacity and annual delay to describe the need for the AIP. For a discussion of "peak period" see response to Comment 1-65.

Letter Codes

FP0040

1-79 **Comment**

The FEIS fails to disclose, discuss, or analyze the fact that the Airport is the only commercial airport in the country of its size or larger that has a wide fluctuation in seasonal operations. The number of Airport operations during the winter is approximately twice as much as the summer. During the winter, the peak days for private jets are arrivals on Friday and departures on Sunday, and the peak hours are Friday afternoon and Sunday afternoon. There is relatively little private jet traffic in the summer.

Response

The FAA does not agree with the statements made by the Commenter. Seasonal peaks at destination airports, including commercial service airports, serving locations with a high tourism base are not unusual and are not limited to PBIA.

Letter Codes

FP0040

1-80 **Comment**

FEIS's failure to address these fundamental facts about the seasonal nature of Airport's operations produces a fatally flawed analysis. The purported amount of congestion and delay at the Airport will occur (if at all) for a few months out of the year, on peak days and peak times. But the FEIS does not identify how often such operational delays will occur, or what periods of time will constitute "peak hours." Spending hundreds of millions of dollars to address undefined and unanalyzed peak delays would be completely irrational and would irresponsibly squander public funds.

Response

Chapter 2.0, Purpose and Need, of the FEIS provides statistical data of both annual delay as well as peak hour delay to describe the need for the Long-Term AIP. The purpose and need statement was framed, for the most part, by the projections of annual average delay. The FEIS notes that peak periods of high demand include the winter tourist season. See Section 2.4 of the FEIS and response to Comment 1-65.

The approval for construction granted at this time by the FAA does not include the Long-Term AIP;

therefore, no public money would be spent for an airfield capacity enhancement project until it is justified based on operational conditions at the airport and if and when it is given unconditional ALP approval by the FAA.

Letter Codes

FP0040

1-81 **Comment**

The FEIS states that "the onset of more rapid growth in delay often occurs when delay is between 4 and 6 minutes per aircraft operation." FEIS at ES-28. Then the FEIS arbitrarily uses an annualized aircraft delay definition of 4.8 minutes calculate the need for a new runway.

Response

The FAA's 2007 – 2011 Report to Congress on the National Plan of Integrated Airport Systems (NPIAS) states that "Experience shows that airfield delay increases gradually with rising levels of traffic. Therefore, the relationship between aircraft operations and delay is non-linear, and often exponential. For larger airports, it appears that the onset of more rapid growth in delay often occurs when delay is between four and six minutes per aircraft operation." While the NPIAS reference is to larger airports, it does not only apply to Operational Evolution Partnership (OEP) airports and should not be construed to be inapplicable to other airports, including medium-hub airports. The FAA's "OEP Frequently Asked Questions – OEP 35 Airport" describes OEP airports as "... commercial U.S. airports with significant activity. These airports serve major metropolitan areas and also serve as hubs for airline operations. More than 70 percent of passengers move through these airports."

(http://www.faa.gov/about/office_org/headquarters_offices/ato/publications/oep/faq/Airports/index.cfm).

The Airport Sponsor's computer simulations and the FAA's independent analyses confirm that average annual delay at PBIA in 2006 was approximately 4.8 minutes – within the 4 to 6 minute range discussed in the NPIAS report. Based on the agency's experience, and for the purpose and need statement in the DEIS, it was determined that PBIA delay values in the 4 to 6 minute range indicated the need to plan for and implement actions to prevent delay from escalating.

The FAA regularly reviews its methods for measuring and evaluating aircraft capacity and delay and never treated delay numbers (4 to 6 minutes) as only the only metric to determine if planning and action was needed at PBIA. The FEIS also evaluated PBIA's Annual Service Volume (ASV). ASV is a model that calculates the number of aircraft operations that can be reasonably accommodated at an airport over a period of a year at a particular level of delay. It is not an absolute capacity number. Rather, it is the capability of the airport to accommodate aircraft operations with a given delay level. The FEIS noted that PBIA was at 78 percent of its ASV in 2006 and that planning for airfield capacity improvements should begin when an airport reaches 60 to 77 percent of its ASV.

As noted above, aircraft delay and ASV represent two criteria that indicate planning and action should be taken to prevent delay from escalating at PBIA. These criteria provided a basis for the FAA purpose and need statement for the Long-Term AIP. Acceptable level of delay at PBIA is considered to be at a level where rapid growth of delay is not imminent and the airport could reasonably accommodate aircraft operations. The acceptable level of delay may vary slightly from airport to airport based on specific conditions at each airport.

The FAA regularly reviews its methods for evaluating aircraft capacity and delay and it recognizes that each airport has specific capacity issues and operational demands. For PBIA and the preparation of the FEIS, the agency determined that delay values in the 4 to 6 minute range indicated the need to plan for and implement actions to prevent delay from escalating and this range was supported by an analysis of PBIA's existing and future ASV demand. As such, the FAA does not agree that the agency's goal was arbitrary.

Letter Codes

FP0040

- 1-82 **Comment**
 The 4.8 minute definition of delay is completely arbitrary, and one more example of the FEIS skewing the analysis to concoct a justification for the new runway. The FEIS ignores the fact that the FAA has stated "a standard definition of acceptable ground delay is not used in the industry since numerous operation factors and airport characteristics influence the acceptability of delay." See FAA FEIS for the Proposed Runway at Miami Int'l Airport, at 1-23, 1-32 (Sept. 1998) (emphasis added) (the "MIA FEIS"). In fact, the FAA has used delay times of 6 to 10 minutes when analyzing other South Florida airport development projects at Miami and Ft. Lauderdale.
- Response**
 The FAA reviewed the operational characteristics and ASV at PBI and determined that PBI delay values in the 4 to 6 minute range indicated the need to plan for and implement actions to prevent delay from escalating. The delay analyses for the other airports were influenced by different sets of factors specific to each airport and in the case of Miami, the delay thresholds were determined years ago under different airline industry conditions. Also see responses to Comments 1-64 and 1-81 regarding FAA's selection of delay criteria in NEPA documentation.
- Letter Codes**
 FP0040
- 1-83 **Comment**
 The difference between using 4.8 minutes instead of 6 minutes is 25%. Use of 6 minutes would push delay projections even farther beyond 2030.
- Response**
 See response to Comments 1-64, 1-81, and 1-82.
- Letter Codes**
 FP0040
- 1-84 **Comment**
 FEIS does not explain what it means by peak hour delays. Therefore, it is impossible to know whether peak delay, which is the only conceivable delay problem the Airport will ever have, has ever been in excess of the FEIS's arbitrary delay threshold.
- Response**
 "Peak hour delay" is the aircraft operational delay experienced during the busiest 1-hour of the day. This could be calculated for the average day or for days during peak weeks or months of the year. Peak hour delay is a function of peak hour capacity and peak hour demand that is specific to an individual airport based on its runway configuration and operational characteristics. The FEIS did not rely on peak hour delay for the determination of Purpose and Need. The FEIS presents a discussion of peak hour demand and capacity (Section 2.5 of the FEIS) as it contributes to delay at PBI. Peak hour operational capacity is considered to be a critical factor in an airport's ability to provide and maintain a high degree of operational efficiency and customer service, particularly at airports providing scheduled commercial service. Airports experience fluctuations in runway use throughout a day, and an airport's calculated hourly capacities vary due to factors such as aircraft fleet mix, ATCT rules, airlines schedules, and other factors. See response to Comment 1-65.
- Letter Codes**
 FP0040
- 1-85 **Comment**
 Even if delays at the Airport could be reliably projected to exceed six minutes in the foreseeable future, that would not be a sufficient reason for approving the Plan. The six minute delay definition is merely an ideal goal that may justify consideration of expansion, but the FAA does not require such expansion.
- Response**
 See response to Comment 1-81. In addition, the FAA does not ever "require" expansion of local airport facilities. The decision to implement airport development projects, including those that enhance capacity, is made by the Airport Sponsor.
- Letter Codes**
 FP0040

1-86 **Comment**

The FEIS's delay analysis is really an analysis of possible "peak period" delays. But as discussed above, the FEIS does not define or explain what "peak period" means, and the FEIS uses an arbitrarily low delay definition of 4.8 minutes. There is no justification for spending vast amounts of public funds to alleviate occasional peak delays.

Response

Aircraft operational delay at PBIA, as with many other airports, occurs during peak periods, including, but not limited to, daily peaks and seasonal peaks. The FEIS provides data and a discussion of both airport capacity and annual delay to describe the need for the Long-Term AIP. Also see response to Comments 1-80, 1-81, and 1-84. In addition, no public funds are being used for capacity enhancements at PBIA because this ROD does not select an alternative for implementation or approve construction of any capacity enhancement projects at PBIA. See response to comment 1-33 regarding funding of airport development projects.

Letter Codes

FP0040

1-87 **Comment**

FEIS inexplicably repeatedly ignores actual available data in favor of hypothetical computer models. The FEIS does not explain how it is possible that in 1998 average annual delay was only 0.6 minutes, while in 2006, when there were 9,300 less operations than in 1998, average annual delay reached 4.8 minutes. See Draft EIS at 1-9, 2-4. The historical data will prove the computer model used by the FEIS produces inaccurate results.

Response

Although the overall number of operations decreased, the number of air carrier and air taxi operations and enplanements increased at PBIA during the referenced period. The changes in delay and operations were due to substantial change in fleet mix at PBIA associated with movement of aircraft to other County-owned airports, such as North County Airport and Lantana Airport.

In the 1990s, the Airport Sponsor developed facilities at its general aviation airports with the intent to draw small GA aircraft to the airports and away from PBIA. This plan was successful in shifting small aircraft to the Airport Sponsor's other airports (see Figure 3.3.4-2 in the FEIS). The associated drop in aircraft operations at PBIA did not necessarily affect or improve the capacity of the airfield as many of the small aircraft using PBIA, and in particular small aircraft training flights, were primarily using the 3,213-foot Runway 10R/28L.

In addition, the Airport Sponsor updated PBIA's Master Plan studies in the 2005 and 2006 time frame. These studies examined the demand, capacity, and delay issues present at PBIA for the 2005 time frame and provided the basis for the Airport Sponsor approaching the FAA with a request to unconditionally approve certain airfield capacity enhancement projects. The FAA conducted its own independent evaluation, including computer simulation modeling, and reached the same conclusions that the airport was experiencing delay in the 2005 - 2006 time frame and that the delay was expected to worsen over time.

The data and standard methodologies used for the evaluation of airport capacity and delay in the FEIS comply with the FAA guidance and accepted industry standards.

Also, see response to Comments 1-8 and 1-73.

Letter Codes

FP0040

1-88 **Comment**

The FEIS fails to address planned technological improvements that will significantly reduce future Airport delays. For example, the FAA's Next Generation Air Transportation System ("NextGen") is projected to reduce delays at the Airport by 25%. See FAA Capacity Needs in the National Airspace System, 2007-2025 (May 2007) at 15.

Response

The FAA considered recent improvements in the airspace serving south Florida (also known as the Florida Airspace Optimization) and considered technological improvements, such as NextGen. Now, and during the preparation of the FEIS, several technologies (i.e., required navigation performance (RNP) procedures) were available or in use at PBIA. While the technologies associated with NextGen provide many benefits to the nation's Air Traffic Control system as a whole, these technologies would not at this time directly provide the needed flexibility and increased airfield capacity offered by the proposed use of dedicated single arrival and departure streams to two separate, but closely-space parallel runways at PBIA. Because FAA recognizes that technology is continually evolving, the FAA will consider the role any new technological improvements can play in addressing needs at PBIA when it is again appropriate to consider approvals of capacity enhancement projects at PBIA based on operational and delay conditions at the airport.

Letter Codes

FP0040

1-89 **Comment**

The FEIS completely fails to analyze the impact of larger airliners in the fleet mix on future Airport operations. For the last 20 years or more, airlines have steadily shifted to larger and larger aircraft. That is why the Airport handles about the same number of passengers today as in 1990, but with significantly fewer airline operations. In 1990, there were 62,045 commercial airline operations; in 2010 there were 52,768. The number of passengers was about the same in 2010 as it was in 1990. Fewer operations mean less delay, not more.

Response

Since 1990, airlines have phased out many older aircraft types and introduced new aircraft types and models better suited for intrastate, regional, domestic, and international flights. Over the last decade there has been a pronounced shift in the types of aircraft used by airlines, including the use of regional jets in favor of small turboprops. The Airport Sponsor's forecast, which was approved by the FAA for use in the EIS and which formed the basis for the Airport Sponsor's and the FAA's capacity and delay analyses, took into account the then current fleet mix operating at PBIA and forecasted fleet mix at PBIA. Fewer operations by larger aircraft do not automatically mean less delay, as posited in the comment. Please see response to Comment 1-67(2) for a discussion of how operations by different types of aircraft can impact delay at an airport.

Letter Codes

FP0040

1-90 **Comment**

The entire purpose of widening taxiway L is to accommodate larger Group IV aircraft, which are almost exclusively airliners. See Pelly letter to FAA, January 6, 2010. All the airliners that presently use the Airport fall into the category of Group III or lower.

Response

The proposed widening of Taxiway "L" is a component of the Near-Term AIP. The Airport Sponsor's objective of this element of the Near-Term AIP is to increase the utility of Taxiway "L" for aircraft currently using Runway 10L/28R and to improve the efficiency of aircraft ground movements at PBIA for aircraft up to and including ADG IV type aircraft. The FAA considered the requested widening of Taxiway "L" and determined that it would provide a benefit for current airport users and did not consider the proposal to benefit air carrier aircraft exclusively. ADG IV aircraft, such as the Boeing 757, currently use Runway 10L/28R, and occasionally use the FBO facilities on the south side of the airport.

Letter Codes

FP0040

1-91 **Comment**

The FEIS fails to analyze whether hypothetical future delays are a result of factors that are not related to conditions at the Airport. For example, delays at the Airport may be caused by arrival and departure delays at other airports, including many congested airports in the northeast. Without studying non-Airport related causes of delay, the FEIS cannot state the true cause of any hypothetical future delays, and therefore cannot determine whether a new runway will cure such delays.

Response

Delay experienced by aircraft operating at PBI can be generated by other factors, including, but not necessarily limited to, adverse weather, "gate holds" at hub airports, and airspace utilization. However, aircraft operational delay that was experienced at PBI prior to the recession was predominantly caused by the airport's runway configuration and the unique fleet mix of aircraft using the airport. Also see response to Comment 1-67.

Letter Codes

FP0040

1-92 Comment

FEIS fails to address the impact of the current expansion of Fort Lauderdale International Airport on future air traffic at the Airport. Fort Lauderdale is projected to have a 33% growth in operations over the next 20 years (from 300,000 to 400,000), Fort Lauderdale is only 50 miles away from the Airport, and they have overlapping markets. It is likely that the Airport will lose a percentage of its future potential passengers to Fort Lauderdale. This appears to be the case: as operations at the Airport have decreased, operations at Fort Lauderdale have correspondingly increased. The FEIS fails to account for, let alone analyze, how the anticipated growth of Ft. Lauderdale will limit the growth of the Airport.

Response

The Commenter has provided no data, analysis, or documentation to substantiate their position that PBI will lose or has lost operations to FLL. The assertion made by the Commenter cannot be substantiated by the FAA; therefore, the FAA cannot adequately respond to the factual assumptions being made in the comment.

FLL is located approximately 45 miles south of PBI. During non-peak driving times, travel between these airports takes approximately 50 to 60 minutes, while during peak travel times, the trip can take longer. The FAA has recently completed the NEPA process for capacity improvement projects at FLL that will enable the airport to accommodate its future demand levels and reduce operational delay. The improvements at FLL are intended to complement, not replace, the AIP at PBI or the other capacity enhancement projects at airports in the South Florida region. The passenger travel time and traffic conditions from the PBI commercial service and GA market area to FLL is beyond the distance and time threshold that most passengers and private/business pilots would be willing to travel. Therefore, the use of FLL as a supplement to PBI would not shift enough operations from PBI to FLL to enable PBI to accommodate the operational levels identified in the FEIS or reduce operational delay to acceptable levels. See Section 3.3.4 of the FEIS.

Letter Codes

FP0040

1-93 Comment

The FEIS fails to analyze or account for the fact that if any delay arises in the future, aircraft operators and passengers themselves will take action to reduce delays, especially peak delays. For example, when delays begin to occur, "airlines would begin to use larger aircraft, adjust schedules, and cancel or consolidated flights during peak delay periods." See FAA Airport Benefit-Cost Analysis Guidance (Dec. 15, 1999).

"Passengers would make use of alternative airports. . . ." Id. This is particularly likely given Fort Lauderdale's close proximity to the Airport.

Response

The FAA does not agree with the comment that "any delay" would result in aircraft operators and passengers taking action to reduce delay. The FAA guidance referenced by the Commenter notes that at 20 minutes of operational delay airport users will consider use of other airports or other modes of transportation. In other words, these types of actions by airport users are reasonably anticipated to occur at very extreme levels of delay. It is FAA's position that airports should, whenever possible, take action to prevent delay from reaching these critical levels. Delay problems should be corrected in a timely way so that airport users do not need to take the types of actions described in the comment. The delay analyses conducted for the FEIS do not show 20 minutes of delay until outer study years. Therefore, a constrained forecast was not anticipated for PBI during the EIS study period.

Letter Codes

FP0040

Comment

The FEIS contains no analysis of the additional taxi delays that would offset any possible time savings from operation of the proposed new runway.

Response

Operational delay at PBI, which includes aircraft taxi time, would not increase as a result of either the Long-Term AIP or Alternative 2. As discussed in Section 2.5.2 of the FEIS, aircraft operational delay levels at PBI for the then-existing and projected levels of aircraft operational demand (based on the PBI 2006 MPU forecasts), were calculated using SIMMOD™. The runway/taxiway simulations presented in the FEIS considered taxi times for both commercial and general aviation aircraft under the No-Action Alternative, as well as the Long-Term AIP and Long-Term Alternative 2. SIMMOD™ is an industry standard analysis tool used by airport planners and operators, airlines, airspace designers, and air traffic control authorities for conducting high-fidelity simulations of current and proposed airport and airspace operations. SIMMOD™ takes into account airport-specific conditions that effect taxi time, such as runway and taxiway configurations, proximity of runway intersection(s), and local operational considerations. Results of the SIMMOD™ analysis indicated that taxi times would be reduced under the Long-Term AIP or Alternative 2. The FAA Airports Division (APD) coordinated with Air Traffic Organization (ATO) and PBI ATCT in regards to aircraft ground movements and taxi times. FAA ATO concurred and indicated it would improve their ability to operate ground movements on the airfield more efficiently.

Letter Codes

FP0040

Comment

The FEIS's conclusion that the proposed new runway will reduce delays, if they ever actually occur is wrong because it is based on invalid assumptions, improper methodology, inaccurate data, and ignores critical factors.

Response

The FAA believes that the calculation of aircraft operational delay at PBI contained in the FEIS is accurate and correct based on conditions that had been recently experienced at the airport (2001 through 2008). The analysis of aircraft operational delay at PBI was based on the FAA approved Airport Sponsor's 2005 forecast for PBI, which indicated that the number of operations at PBI after the year 2006 and through the years 2013 and 2018 would result in unacceptable levels of operational delay (4.8 minutes in 2006, 10.2 minutes in 2013, and 20.6 minutes in 2018) to aircraft operating at PBI. The delay calculations were developed using SIMMOD™, which is widely accepted technological modeling tool available to analyze potential aircraft operational delay and airport congestion. It is used in FAA's NEPA documents when delay and congestion at airports is an issue.

Letter Codes

FP0040

Comment

The FEIS asserts that there is a problem at the Airport because it is essentially operates as a single runway airport because the other large runway, which runs diagonally from northeast to southwest and crosses the main runway (the "Diagonal Runway"), issued for less than 10% of the operations at the Airport. Of course, the Airport has operated as a "single runway" airport for decades, with minimal actual delay. So has Ft. Lauderdale, which has a far larger number of operations. Having a single runway is not in and of itself a problem, and the Airport's main runway is more than sufficient to handle Airport operations now and for the foreseeable future.

Response

The reference to a "single runway" refers to the fact that the utility of PBI's diagonal runway substantially decreases during peak periods for reasons that include PBI ATCT operational requirements and the local preference for using Runway 10L/28R. The fact that the physical configuration and operational requirements of the runway system at PBI has contributed to aircraft operational delay was documented by the Airport Sponsor and independently confirmed by the FAA.

Also see response to Comment 1-95. Finally, the FAA agrees that in the current operational climate at PBIA, the existing runway is sufficient to handle airport operations and that a capacity enhancement project at PBIA is not ripe for decision at this time.

Letter Codes

FP0040

1-97 **Comment**

Departing aircraft at the Airport are generally separated by a two to three minute interval. Obviously, no airplane can take off while the landing aircraft is still on the same runway. It takes about a minute and a half for the landing aircraft to land, slow down, and turn off of the runway. Since the interval for departing aircraft is more than 1.5 minutes, sequencing landings and takeoffs on a single runway does not cause any delay. Current and past operations on the single runway have not caused any unacceptable delays.

Response

The FAA does not agree with the Commenter's statement that "sequencing landings and takeoffs on a single runway does not cause any delay" and that past operations on the "single runway have not caused any unacceptable delays." For a discussion of the analyses and documentation of studies that evaluated delay at PBIA, see the response to Comment 1-81.

Letter Codes

FP0040

1-98 **Comment**

FAA should revisit the assumed plane mix which contradicts with the Palm Beach International Airport Forecast Study, CH2M Hill, December 2005 for the Imaginary "Future Years" modeled in the Airport and Airspace Simulation Model (SIMMOD).

Response

The FAA initially reviewed and approved the 2005 PBIA forecast for use in the EIS. The forecast report discusses changes since the 1990s of air carrier fleet mix across the airline industry (i.e., increased model commonality for each carrier and increased use of smaller aircraft and regional jets on short-haul domestic routes). The forecast noted that PBIA will remain predominantly a narrow-body aircraft air carrier market because of the preponderance of domestic service. These aircraft generally have between 70 and 189 seats. This predominance is shown in Exhibit 4-1 of the forecast. The same exhibit also depicts a gradual increase in larger aircraft operating at PBIA with 190 and more seats. The forecast also shows that the number of small based aircraft at PBIA will continue to decrease, while the number of larger based aircraft (jets) will increase. This is consistent with statements in the FEIS regarding future fleet mix as it relates to calculations of ASV.

Letter Codes

FP0008 FP0024

1-99 **Comment**

If PBIA reaches the imaginary "Future Year 1" operations of 204,054 after the year 2023 then the EIS would be out of date, again this would bring into question the entire EIS and the Record of Decision opening it up for legal challenge. This 2.6 million dollar study has provided no resolution and will drag out legal battles and legal costs for the County and the Citizens of Palm Beach County.

Response

The FAA's 2009 TAF and 2010 TAF show that future aircraft activity at PBIA would likely increase at a modest annual rate when compared to the 2006 Master Plan Update Forecast on which the September 2008 DEIS analyses were based. The 2009 TAF indicates that the level of activity at PBIA (approximately 204,054 aircraft operations) that would begin to cause unacceptable delay would be reached around the 2030 time frame. Due to ongoing economic conditions, the 2010 and 2011 TAFs indicate that 204,054 operations may not be reached at PBIA until 2034 and 2039, respectively. However, FAA understands the limitations and variability inherent within a long-range forecast and would not consider the possibility for a more rapid economic and aviation activity recovery to be unreasonable. The FAA updates the TAF annually to reflect recent trends and future assumptions.

As detailed in FAA Order 5050.4B, Section 1401.c., the FAA considers a Final EIS valid for 3 years

from the date the FAA approving official signed the FEIS' Notice of Availability. For staged projects, or projects requiring successive Federal approvals, the FAA must, at a minimum, prepare a written re-evaluation if more than 3 years elapse between the date of a final EIS and major steps taken toward implementation of the project. The FAA's future review and environmental documentation regarding the FEIS would focus on the document's continued adequacy, accuracy, and validity. If needed, the FAA must at a minimum prepare a supplement document for those parts of the final EIS that no longer provide acceptable or accurate information.

The Long-Term AIP would be considered by the FAA for unconditional ALP approval only when the number of aircraft operations at PBI returns to the levels that would cause unacceptable aircraft operational delay. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0008 FP0024

1-100 **Comment**

There is no current or foreseeable purpose and need for the Airfield Improvement Project.

The FEIS is based on flawed and outdated data. The FEIS acknowledges that air traffic at PBI has fallen below levels that would justify any need for the proposed project, and concedes that the FAA has no way of knowing when the number of aircraft operations at PBI "would again reach the level that previously justified the need for the capacity enhancements improvements" (FEIS ES-15). Simply retaining and parroting the outdated Purpose and Need statement from the September 2008 DEIS is illogical, given the fact that the FAA now knows that the data it used in 2008 did not accurately predict actual activity levels in subsequent years. In fact, the PBI 2006 Master Plan Update (MPU) predicted aircraft operations at 212,804 for 2010 (FEIS Table ES-1); however, the FAA's 2009 Terminal Area Forecast (TAF) calls for only 138,643 aircraft operations in 2010 (FEIS Table ES-2). In other words, the predictions in the 2006 MPU have already proven to be wrong by approximately 74,000 aircraft operations for 2010—a factor of 35 percent. This glaring disparity between the projections of the 2006 MPU and the 2009 TAF suggests that the FAA should evaluate the AIP at a point in time when aircraft operations show a meaningful potential to grow to levels that warrant consideration of this project.

The updated 2009 Terminal Area Forecast indicates that the number of aircraft operations at PBI may not even return to 2006 levels again until 2030, which is almost 20 years from now. (ES-12, ES-23.)

Response

In regard to the comment regarding flawed or outdated data, see response to Comments 1-1, 1-8, 1-15, and 1-16.

The Long-Term AIP would be considered by the FAA for unconditional ALP approval only when the number of aircraft operations at PBI returns to the levels that would cause unacceptable aircraft operational delay. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0041

1-101 Comment

The presentation of information in the FEIS is misleading.

The FEIS is misleading because there are repeated cross-references to the September 2008 DEIS, which do not reflect the actual need for this project now or even within the next two decades. For example, even though a small footnote is included in FEIS Table ES-3, it gives the impression that aircraft operations at the airport will suddenly exceed the airport service volume during some unknown "Future Year 1." The reality is that existing aircraft operations and the 2009 Terminal Area Forecast indicate that aircraft operations will not approach the critical 200,000 mark until 2030.

Response

The FAA notes that need for the proposed overall AIP and the implementation plan and schedule for the airfield capacity enhancement components of the AIP were affected by the economic recession, which occurred during the course of the FAA's preparation of the FEIS. In Section 2.1 of the FEIS, the FAA provides an explanation as to why the Purpose and Need statement from the September 2008 DEIS was retained for the 2011 FEIS. In summary, the FAA acknowledges that the agency cannot predict when the number of aircraft operations at PBI would again reach the level that previously justified the need for the airfield capacity enhancement improvements at PBI (expansion of Runway 10R/28L). Because of this, the FAA has retained the Purpose and Need discussion presented in the September 2008 DEIS for the 2011 FEIS as the basis for the Purpose and Need discussion for the overall AIP. This approach is predicated upon a trend outlined in the FAA's 2009 TAF of more moderate, but steady, growth in aircraft operations at PBI. While the FAA's 2009 TAF does predict a modest but steady increase in aircraft activity, it is not yet clear precisely when PBI can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay, such as those that previously existed and were anticipated to worsen. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0041

1-102 Comment

Approval of near term projects at PBI 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.

Response

As discussed in Section 1.1 of the FEIS, the FAA found that the development items included in the Near-Term AIP do not rely for their justification on the proposed Runway 10R/28L expansion project and are, therefore, justified for unconditional ALP approval now. The discussion of the Airport Sponsor's goal and objectives for the Near-Term AIP, which provides additional information regarding the independent utility of each component of the Near-Term AIP, is provided in Section 2.3 of the FEIS.

Letter Codes

FL0001

1-103 Comment

The FAA should not approve, conditionally or unconditionally, any short or long term components of the proposed airport expansion.

Response

The FAA acknowledges the Commenter's request to not approve, conditionally or unconditionally, the County's proposed Near-Term AIP and Long-Term AIP.

Letter Codes

FL0001

1-104 **Comment**

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.

Response

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FL0001

1-105 **Comment**

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.

Response

The FAA acknowledges the Commenter's request to not approve, conditionally or unconditionally, the County's proposed Near-Term AIP and Long-Term AIP.

Letter Codes

FL0001

1-106 **Comment**

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.

Response

Please see response to Comments 1-1, 1-2, and 1-28.

Letter Codes

FL0001

1-107 **Comment**

The most recent FAA forecasts indicate that delays at the Airport will not occur until after 2030, if ever.

Response

Please see response to Comments 1-1, 1-8, and 1-15.

Letter Codes

FL0001

1-108 **Comment**

The proposed new runway will not alleviate the hypothetical delays if they ever do materialize.

Response

Planning studies prepared by the Airport Sponsor and independently evaluated by the FAA show that the proposed Long-Term AIP would increase airfield capacity at PBIA and would reduce delay (based on 2005 - 2008 activity levels) at PBIA to acceptable levels. See Section 3.3.7 in the FEIS for

additional information.

Letter Codes

FL0001

1-109 **Comment**

Finally, there are other more effective and economical ways to alleviate Airport delays if they ever become a problem.

Response

The Commenter does not provide any factual evidence to support the comment, therefore, the FAA cannot respond directly to the comment. The FAA evaluated a wide range of alternatives, including operational and airport development alternatives. See Section 3.0 of the FEIS for a detailed discussion of the identification and evaluation of alternatives.

Letter Codes

FL0001

1-110 **Comment**

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.

Response

The FAA is unable to provide a detailed response to the Commenter's statement because the comment lacks specificity. However, with respect to the comment, the FAA disagrees that there are "important flaws with the justification, methodologies, and data used on the FEIS." The PBI A EIS was prepared in full accordance with guidance provided in FAA Orders 5050.4B and 1050.1E relating to the preparation and processing of NEPA documents for airport actions. The FEIS acknowledges changes in activity at PBI A and the Airport Sponsor's decision to seek only conditional ALP approval for the Long-Term AIP and request unconditional ALP approval for the Near-Term AIP at this time. Because of public interest in the project, the FEIS discloses potential environmental impacts relative to the levels of aircraft activity at PBI A that previously resulted in unacceptable levels of operational delay at PBI A and which formed the basis of the Purpose and Need, or justification, for the Airport Sponsor's proposed overall AIP.

Under typical circumstances, the FAA would disclose in its EIS both the nature and timing of the anticipated environmental consequences. As previously indicated, however, the FAA cannot predict the exact future point in time when aircraft operations at PBI A may reach levels that again justify the need for the expanded Runway 10R/28L. However, this does not impair the FAA's ability to disclose the potential environmental impacts and consequences that are associated with the levels of aircraft operations that were previously experienced at PBI A and which would be anticipated to occur in the future when the proposed improvements were justified and implemented. Therefore, the FAA presented in the FEIS a description of the environmental consequences that would occur at the identified operational levels based on the best information available at the time of the preparation and release of the document.

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI A, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FL0001

1-111 **Comment**

The City has significant concerns with the FAA's apparent decision to allow for piece meal development at PBI by agreeing with PBI'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.

Response

See response to Comments 1-62 and 1-102.

Letter Codes

FL0001

1-112 **Comment**

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.

Response

The FAA carefully examined whether or not a mixed ALP approval would result in segmentation of the project to avoid full disclosure of impacts or to establish elements of the AIP that would influence future NEPA processing. The FAA found that the development items included in the Near-Term AIP do not rely for their justification on the proposed Runway 10R/28L expansion project and are, therefore, justified for approval now. Furthermore, the EIS examines both the environmental impacts of the Near-Term AIP and Near-Term Alternative 2 standing alone, and the environmental impacts of the implementation of the overall AIP and Alternative 2, thus addressing the typical concern that "segmentation" will hide the environmental impacts of the inappropriately segmented projects when considered as a unified proposal.

In regard to the acquisition of property near Military Trail and Southern Boulevard, the Airport Sponsor has articulated a near-term objective for land acquisition on the east side of Military Trail that does not rely for its justification on the proposed Runway 10R/28L expansion project and such acquisition is, therefore, justified for unconditional ALP approval at this time. The Airport Sponsor's objectives is to acquire sufficient interest in adjacent properties between Military Trail and the existing west airport property line to better secure and define the airport's boundary and/or convert the land to aeronautical use, including revenue-generating use. The FAA acknowledges that several parcels of property located near the Military Trail and Southern Boulevard interchange would need to be acquired for the proposed Runway 10R/27L Runway Protection Zone if the Long-Term AIP was implemented. However, the properties could be acquired to meet the Airport Sponsor's objectives regardless of the implementation of the Long-Term AIP. Therefore, the FAA concluded that the acquisition of these parcels in particular do not depend on the Long-Term AIP for its justification.

Letter Codes

FL0001

1-113 **Comment**

It appears that many of the components of the Long Term project could not be constructed without the completion of the Near Term projects.

Response

See response to Comments 1-102 and 1-112.

Letter Codes

FL0001

1-114 **Comment**

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 PBI returns to levels that would cause unacceptable aircraft delays.

Response

The FEIS does not indicate "support" for the Near-Term AIP. The FEIS notes that the Airport Sponsor is requesting unconditional ALP approval of the Near-Term AIP and the FEIS evaluates the potential environmental impacts associated with the Near-Term AIP. The FAA has granted unconditional ALP approval for the Near-Term AIP in its Record of Decision for the EIS.

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FL0001

1-115 Comment

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.

Response

As discussed in Section 1.1 of the FEIS, the FAA found that the development items included in the Near-Term AIP do not rely for their justification on the proposed Runway 10R/28L expansion project and are, therefore, justified for approval now.

The discussion Airport Sponsor's goal and objectives for the Near-Term AIP, which provides additional information regarding the independent utility of each component of the Near-Term AIP, is provided in Section 2.3 of the FEIS.

The business decision whether or not to proceed with the Near-Term AIP rests with the Airport Sponsor.

Letter Codes

FL0001

1-116 Comment

The City continues to question the flawed premise that this project is needed in order to reduce future congestion and delays at PBI as airport activity grows. Aircraft operations at PBI have decreased significantly over the last 30 years. PBI 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 PBI 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 PBI which has been caused by a multitude of factors.

Response

See response to Comment 1-8.

Letter Codes

FL0001

1-117 Comment

Even though airplane activity at PBI decreased significantly during the last three decades, the annual activity forecasts for PBI generated by the FAA and by the Airport during that same period continually overestimated future activity for PBI and inaccurately predicted future increases in airplane activity. Despite the lack of reliability of PBI'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.

Response

See the response to Comments 1-15 and 1-16.

The forecasts of aviation activity prepared by the FAA and the County take into account many factors, and represent the best estimate of the existing and future number of aircraft operations at PBIA and at other airports across the country. The FAA TAF considers actual data, such as ATCT records, number of aircraft operations, and the number of based aircraft, from the most recent year to update its forecast for a particular airport. The FAA TAF also considers other factors such as numerous national, regional, and local trends. However, it is important to remember that the forecast are estimates only. Sudden or unanticipated social and/or economic changes at the local community level, as well as at the national level can result in substantial effects to the forecasts. Of particular note, the nation's aviation system was substantially affected by the events of September 11, 2001 and the recent economic recession.

Letter Codes

FL0001

1-118 **Comment**

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.

Response

See response to Comments 1-8, 1-15, 1-16, and 1-17.

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FL0001

1-119 **Comment**

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.

Response

The calculations of delay for the year 2006 would have no bearing on the calculation of delay for future years. The FAA believes that the calculation of aircraft operational delay at PBIA contained in the FEIS is accurate and correct based on conditions that had been experienced at the airport. The delay calculations were developed using SIMMOD™, which is widely accepted technological modeling tool available to analyze potential aircraft operational delay and airport congestion. It is used in FAA's NEPA documents when delay and congestion at airports is an issue. SIMMOD™ validation tests and evaluations have been conducted by the FAA in the past at several U.S. airports and ATC facilities.

The model also received regular upgrades and enhancements over the last 25 years and is considered to be a mature model.

For the PBIA EIS, the ATCT at PBIA was consulted during the modeling process in regard to airfield and airspace operating procedures. Discussions with the PBIA ATCT confirmed the aircraft operational delay levels indicated by the SIMMOD™ model runs. The ATCT was also consulted throughout the EIS study to review and discuss delay conditions at PBIA, including the reduced delay conditions during the onset of the economic recession. The FAA's independent SIMMOD™ analyses were also consistent with the delay calculations prepared by the Airport Sponsor.

Letter Codes

FL0001

1-120 **Comment**

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.

Response

See response to Comment 1-119.

The FAA notes that the Near-Term AIP has independent utility from the airfield capacity enhancement projects that comprise the Long-Term AIP. In this regard, delay modeling is not necessary for the evaluation of whether or not to grant unconditional ALP approval for the Near-Term AIP.

In its ROD for the 2011 FEIS, the FAA is not granting unconditional ALP approval of the Long-Term AIP. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FL0001

1-121 **Comment**

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 PBI 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 PBI 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 PBI because 2009 Terminal Area Forecast (TAF) for PBI 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 PBI 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 PBI would be delayed by several decades. In addition, when, and if, PBI 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 PBIs future ASV Capacity be performed at that time.

Response

At the outset of the EIS study, the FAA validates an Airport Sponsor's forecast against the current TAF. In this case, the FAA reviewed the Airport Sponsor's (Palm Beach County's) 2006 forecast and found it reasonable and consistent with the then current TAF. The FAA also found the Airport Sponsor's projection of fleet mix change within the forecast period at PBI to be reasonable. The timing of fleet mix change at PBI would be expected to occur over a period of time and not in a specific year and would be applicable to all alternatives, including the No-Action Alternative.

The use of larger aircraft at PBI and the potential impact on operational delay was discussed in the FEIS. As discussed in Section 2.5.1 of the FEIS, the ASV for the existing airfield was calculated to be 263,444 annual operations (FEIS, CH2M HILL, 2006a). Over time, however, changes in the type and size of air carrier aircraft operating at PBI would serve to decrease the calculated estimate of ASV to a value of 221,039. This reduced ASV capacity is primarily related to the planning assumption that the number of larger-sized commercial service aircraft providing scheduled air carrier service at PBI would increase between 2006 and 2018. This assumption was considered by the FAA to be reasonable, and although the timing of the shift is not ironclad, it is based on industry trends and not on the implementation of the AIP at PBI. This trend is already occurring in the aviation sector, with new orders for smaller commercial aircraft such as regional jets plummeting. This trend is easily documented in public news sources. See, for example, <http://www.flightglobal.com/news/articles/in-focus-boom-and-bust-the-regional-jet-phenomenon-370541/>. However, as with aviation activity in general at PBI, the exact timing at which shifts in overall fleet mix identified in the FEIS will occur is not precisely clear. The decision of when and to what extent smaller jets should be phased out is a business decision of the airlines and private operators who fly in and out of PBI. For this reason, the FAA can only estimate when these entities will begin to substitute aircraft in their operations at PBI. Given that the conditional ALP approval being granted by the FAA for the runway expansion does not require environmental analysis prior to issuance, and given the requirement to validate the 2011 FEIS prior to rendering any future decision on the Long-Term AIP, the FAA will have more current information available on this topic at that time.

It should be noted that the number and type of larger-sized commercial service aircraft projected to operate at PBI would be the same for the No-Action Alternative, the Airport Sponsor's proposed AIP, and any other reasonable alternatives at PBI. Furthermore, basic assumptions regarding fleet mix at PBI will, like the rest of the FEIS, need to be validated if and when the Airport Sponsor again seeks unconditional ALP approval of capacity enhancements at PBI.

Also see responses to Comments 1-122 and 1-139.

Letter Codes

FL0001

1-122 **Comment**

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.

Response

Since 1990, airlines have phased out many older aircraft types and introduced new aircraft types and models better suited for intrastate, regional, domestic, and international flights. Over the last decade, there has been a pronounced shift in the types of aircraft used by airlines, and that shift in preferred aircraft continues to occur. In the earlier part of the last decade, a shift began with the use of regional jets in place of smaller turboprops. In more recent years, it appears that the trend toward ever larger aircraft is continuing in the aviation sector, with new orders for smaller commercial aircraft such as regional jets plummeting. This trend is easily documented in public news sources. See, for example, <http://www.flightglobal.com/news/articles/in-focus-boom-and-bust-the-regional-jet-phenomenon-370541/>. The Airport Sponsor's forecast, which was approved by the FAA for use in the EIS and which formed the basis for the Airport Sponsor's and the FAA's capacity and delay analyses, took into account the then current fleet mix operating at PBIA and forecasted fleet mix at PBIA.

As discussed in the response to Comment 1-121, the reduced ASV capacity projected at PBIA is primarily related to the planning assumption that the number of larger-sized commercial service aircraft providing scheduled air carrier service at PBIA would increase between 2006 and 2018. This assumption was considered by the FAA to be reasonable, and is based on industry trends and not on the implementation of the AIP at PBIA. However, as with aviation activity in general at PBIA, the exact timing at which shifts in overall fleet mix identified in the FEIS will occur is not precisely clear. The decision of when and to what extent smaller jets should be phased out is a business decision of the airlines and private operators who fly in and out of PBIA. For this reason, the FAA can only estimate when these entities will begin to substitute aircraft in their operations at PBIA. Given that the conditional ALP approval being granted by the FAA for the runway expansion does not require environmental analysis prior to issuance, and given the requirement to validate the 2011 FEIS prior to rendering any future decision on the Long-Term AIP, the FAA will have more current information available on this topic at that time.

Furthermore, the comment assumes that if airlines shift their fleets to include a greater number of larger aircraft, then fewer flights will be required to serve the same number of passengers, thus offsetting any impact on ASV otherwise caused by the anticipated changes in fleet mix at PBIA. This assumption is incorrect for several reasons. First, even assuming facts most favorable to the commenter's argument (that enplanements at PBIA would remain static), the increased use of larger aircraft as described in the FEIS would not provide substantial reductions in ASV because, as discussed above, the introduction of larger aircraft would necessitate PBIA ATCT controllers to increase separations between the large aircraft and other aircraft. Even if the total number of aircraft operating at PBIA are somewhat reduced because the aircraft can seat more passengers, it would be unlikely to eliminate enough aircraft operations to preserve the ASV.

Second, the selection of aircraft types operating at PBIA would be made by the airlines and not the Airport Sponsor or FAA. Assuming enplanements are static and there are no significant changes in the types of service or destinations, an assumption that the larger aircraft would operate consistently at full capacity at a level to preserve ASV is overly optimistic.

Third, it is incorrect to assume that the number of passenger enplanements at PBI would remain static. The FAA, in its 2009, 2010, and 2011 TAFs, projects that passenger enplanements at PBI will increase at a moderate rate over time. Thus, use of larger aircraft would not necessarily reduce the number of scheduled commercial flights and aircraft operations at PBI, as assumed by the commenter. The growth in passenger enplanements over time may, in fact, cause some airlines that operate small to medium-size aircraft to actually add scheduled flights.

Please see responses to Comments 1-121 and 1-139.

Letter Codes

FL0001

1-123 **Comment**

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 PBI 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 PBI reaches the activity levels for Future Year 2 and Future 3, additional capacity should be provided in the form of a new runway.

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 PBI forecasts, with projected ASV capacity figures for PBI which were developed specifically for certain years (the period from 2006 to 2018), were calculated based on assumptions about the fleet mix at PBI 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 PBI would need additional capacity in the form of a new runway.

Response

The FAA has not used the operational levels presented in Table 2.5.2-1 of the FEIS to determine at which future activity level PBI would need additional capacity in the form of a new runway, as stated in the comment. In fact, the FAA used those operational levels in the FEIS as a way to provide a general understanding of the likelihood for delay at certain operational levels based on today's data. The FAA openly acknowledged in its FEIS, ROD and here in these responses to comments, that the FAA will need to validate all assumptions and conclusions contained in the 2011 FEIS utilizing data current at the time the Airport Sponsor makes a future request for unconditional ALP approval of a capacity enhancement project. Furthermore, the FAA has indicated that it will consider airfield capacity enhancements in the future only when delay conditions again warrant it, not when operational levels identified in the FEIS are reached.

Table 2.5.1-1 of the FEIS illustrates how the number of aircraft operations at PBI can affect the percent of ASV of the existing airfield. The FAA notes that it is aircraft type, aircraft activity levels and runway configuration at PBI, not a particular calendar year, that determines the airfield's capacity and the associated levels of delay. The FAA cannot precisely predict exactly when the number of aircraft operations at PBI would again cause unacceptable levels of aircraft operational delay, indicating the need for the capacity enhancement improvements at PBI (expansion of Runway 10R/28L). Because of this, the FAA has retained the Purpose and Need discussion presented in the September 2008 DEIS for the FEIS as the basis for the Purpose and Need discussion for the overall AIP. This approach is predicated upon a trend outlined in the FAA's 2009, 2010, and 2011 TAFs of more moderate, but steady, growth in aircraft operations at PBI. While the FAA's 2009 – 2011 TAFs do predict a modest but steady increase in aircraft activity, it is not yet clear precisely when PBI can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay, such as those that previously existed at PBI and were anticipated to worsen. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI,

the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD. The future documentation will include validation of foundational assumptions, such as fleet mix operating at the airport.

Letter Codes

FL0001

1-124 **Comment**

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.

Response

The purpose and need statement was framed by the projections of annual average delay. The evaluations of peak hourly capacities for PBIA were based on Peak Month Average Day (PMAD). It should be noted that this is independent of the calculation of average annual delay using SIMMODTM.

Sections 2.4 and 2.5 of the FEIS provide a discussion of both annual delay and peak hour demand to describe the need for the overall AIP. Peak hour operational capacity is considered to be a critical factor in an airport's ability to provide and maintain a high degree of operational efficiency and customer service, particularly at airports providing scheduled commercial service. Because airports experience fluctuations in runway use throughout a day, and an airport's calculated hourly capacities vary due to factors such as aircraft fleet mix, ATCT rules, airlines schedules, and other factors.

Letter Codes

FL0001

1-125 **Comment**

City's concern 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

Response

See response to Comments 1-121 and 1-124 regarding capacity and delay. Please also see response to Comments 25-1 and 25-2 regarding cost considerations.

Letter Codes

FL0001

1-126 **Comment**

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 PBI would lead to increased noise, vibration, and pollution effects for the surrounding neighborhoods.

Response

This comment appears to address several issues, including the need for the Near-Term AIP, the need for the Long-Term AIP, the adequacy of the FAA's alternatives evaluation, and the adequacy of the FAA's disclosure of environmental consequences.

Regarding the current need for airfield capacity enhancements at PBI (Long-Term AIP), please see response to Comment 1-1. Regarding the Airport Sponsor's objectives for the Near-Term AIP, please see Section 2.3 of the FEIS. Also, please see response to Comment 1-102 regarding the independent utility of the Near-Term AIP components. Regarding alternatives to the Long-Term AIP, the FAA evaluated a total of 27 alternatives in the FEIS, including eight alternatives that did not involve runway expansion. See Section 3.0 of the FEIS for the FAA's alternatives analysis. Regarding environmental consequences of the Long-Term AIP, the FEIS addressed 18 different environmental, social, and socioeconomic categories for potential environmental impact. In all but one category, there would be minimal, or less than significant impacts (see Section 5.12 of the FEIS regarding noise and vibration impacts and Section 5.2 regarding air quality/pollution). The Long-Term AIP does have the potential to result in significant impacts requiring mitigation measures (see Section 6.3 of the FEIS). However, the Long-Term AIP is not being unconditionally approved on the Airport Sponsor's ALP at this time.

Letter Codes

FL0001

1-127 **Comment**

The City feels that approval of near term projects at PBI 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 PBI to resubmit a new and complete Environmental Impact Statement when, and if, PBI decides to come back with a proposal for expansion.

Response

The FAA acknowledges the City's request to not approve, conditionally or unconditionally, the County's proposed Near-Term AIP and Long-Term AIP. The FAA also acknowledges the City's request to prepare a new EIS, if and when, the County "decides to come back with a proposal for expansion." Regarding the objectives for the Near-Term AIP, see Section 2.3 of the FEIS. Also, please see response to Comment 1-102 regarding the independent utility of the Near-Term AIP components.

Letter Codes

FL0001

1-128 **Comment**

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.

Response

Comment noted.

Letter Codes

FF0002

1-129 **Comment**

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.

Response

The FAA has identified the Agency's Preferred Alternative based on the best information available at this time, and recognizes the need to fully validate the analysis contained in the FEIS when a future decision on capacity enhancement at PBI A becomes ripe for FAA consideration.

Letter Codes

FL0002

1-130 **Comment**

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?

Response

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI A, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of the an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD. Also, please see response to Comment 1-129.

Letter Codes

FL0002

1-131 **Comment**

FDOT's Aviation Office has no comments.

Response

The FAA notes that the FDOT's Aviation Office has no comments.

Letter Codes

FS0001

1-132 **Comment**

I am concerned with lack of current statistics. It does not seem that this expansion is necessary nor will there be the air traffic to warrant such cost.

Response

See response to Comment 1-1.

Letter Codes

FP0042

1-133 **Comment**

Please, NO Expansion. I live near Parker between Belvedere and Southern. From the current traffic trends, we do NOT need an expansion. It will be a waste of money and a burden on our neighborhood

Response

Comment opposing expansion of PBI A noted. Please see response to Comment 1-28.

Letter Codes

FP0043

1-134 **Comment**

Although the EIS separates the Sponsor's proposed project into near term and long term components, the EIS does not address why the no-action alternative cannot be correspondingly distinguished. The no-action section addresses the issue as though a possible scenario (traffic increase) supports a present need for action in terms of conditional approval of the ALP. The no-action alternative analysis

is inconsistent with the lack of need determination for runway expansion contained in other sections of the EIS.

Response

In accordance with the requirements of CEQ and NEPA, the No-Action Alternative was evaluated for a basis of comparison with other alternatives. The No-Action Alternative assumes that none of the projects requested for conditional or unconditional ALP approval as part of the current environmental review would be developed at PBIA. This alternative would not include any airfield improvements beyond those that are already environmentally reviewed, programmed, or undertaken by the Airport Sponsor and/or are needed for safety, security, or maintenance reasons.

As discussed in Section 3.3.1.2 of the FEIS, the No-Action Alternative was evaluated with respect to the Purpose and Need criteria established for the AIP. Airfield simulation analysis of the No-Action Alternative utilizing SIMMOD™ (a discrete-event computer-based simulation model) revealed that the average delay per aircraft operation would be approximately 20 minutes when aircraft operations at PBIA reach 238,457, or 14 to 16 minutes greater than the acceptable level of delay (4 to 6 minutes). Therefore, the No-Action Alternative would not reduce the projected levels of aircraft operational delay to acceptable levels. Although the No-Action Alternative did not meet the Purpose and Need criteria, it was retained for further consideration in the alternatives screening process to disclose its potential constructability, cost, and environmental impacts and to provide a baseline comparison in accordance with CEQ regulations.

Letter Codes

FP0044

1-135 **Comment**

After listening to the superb presentation given to our neighborhood association about the airport expansion by Donald Trump's lawyer, I was appalled that a new useless parallel runway was even being considered. Parallel runways are never used concurrently.

Response

A new parallel runway is not being considered for unconditional ALP approval by FAA at this time. Please see response to Comment 1-1. However, the FAA notes that many other commercial service airports in the United States operate with closely-spaced (800 to 1,000 feet of separation) parallel runways. A small example of commercial service airports with closely-spaced parallel runways includes the San Francisco International Airport, William P Hobby Airport – Houston (HOU), and Houston George Bush Intercontinental Airport.

As discussed in Section 3.3.6 of the FEIS, three widely-spaced parallel runway configurations were evaluated with respect to the operational delay issues at PBIA, but were found to be cost-prohibitive at PBIA due to relocations of substantial airport and/or commercial developments. Computer modeling of the Long-Term AIP and Long-Term Alternative 2 indicates that the closely-spaced dependent runway configuration proposed as part of the overall AIP at PBIA would indeed increase airfield capacity and reduce delay to acceptable levels.

Letter Codes

FP0045

1-136 **Comment**

With economic conditions as they are government waste must be brought under control. Elected officials and those hired to spend taxpayers [sic] money are going to have to listen to those who are paying for these wasteful projects.

Response

Please see response to Comment 1-28 regarding expenditures of public funds for the runway component of the project.

Letter Codes

FP0045

1-137 **Comment**

Opposed to expansion.

Response

Comment opposed to expansion of PBI is noted.

Letter Codes

FP0046

1-138 **Comment**

I have reviewed both sides of this issue, and I am shocked that so few people have so much power over our lives, i.e. the airport commission. They have not proved a need, and people with their private planes should not dictate airport policy and waste money.

Response

Please see response to Comments 1-1 and 1-28.

Letter Codes

FP0046

1-139 **Comment**

In regards to ASV the study failed to address my comment made on November 24th 2008:

"The assumption that the Annual Service Volume (ASV) will go down in 2018 based on an increased use of larger sized commercial aircraft is opposite of the assumption made in the Palm Beach International Airport Forecast Study, CH2M Hill, December 2005 which assumed that the use of smaller commercial planes would increase and larger commercial planes would decrease."

The study referred the reader to comment 1–134 which then goes on to refer the reader to 1–115 [ed. – Commenter is referring to Appendix K of the FEIS].

No where does this address the conflicting assumptions of plane mix. If the FAA will address this at a later time they should not change the ASV in the FEIS in Imaginary "Future Year 3".

Response

The FAA initially reviewed and approved the 2005 PBI forecast for use in the EIS. The 2005 forecast report discusses changes since the 1990s of air carrier fleet mix across the airline industry (i.e., increased model commonality for each carrier and increased use of smaller aircraft and regional jets on short-haul domestic routes). The forecast noted that PBI will remain predominantly a narrow-body aircraft air carrier market because of the preponderance of domestic service. These aircraft generally have between 70 and 189 seats. This predominance is shown in Exhibit 4-1 of the forecast. The same exhibit also depicts a gradual increase in larger aircraft operating at PBI with 190 and more seats. The forecast also shows that the number of small based aircraft at PBI will continue to decrease, while the number of larger based aircraft (jets) will increase. This is consistent with statements in the FEIS regarding future fleet mix as it relates to calculations of ASV and there are no conflicting assumptions of fleet mix.

In the FEIS, the ASV for the existing airfield was calculated to be 263,444 annual operations (FEIS, CH2M HILL, 2006a). Over time, however, changes in the type and size of air carrier aircraft operating at PBI would serve to decrease the calculated estimate of ASV to a value of 221,039. This reduced ASV capacity is primarily related to the planning assumption that the number of larger-sized commercial service aircraft providing scheduled air carrier service at PBI would increase between 2006 and 2018. This assumption was considered by the FAA to be reasonable, and is based on industry trends and not on the implementation of the AIP at PBI. This trend is already occurring in the aviation sector, with new orders for smaller commercial aircraft such as regional jets plummeting. This trend is easily documented in public news sources. See, for example, <http://www.flightglobal.com/news/articles/in-focus-boom-and-bust-the-regional-jet-phenomenon-370541/>. However, as with aviation activity in general at PBI, the exact timing at which shifts in overall fleet mix identified in the FEIS will occur is not precisely clear. The decision of when and to what extent smaller jets should be phased out is a business decision of the airlines and private operators who fly in and out of PBI. For this reason, the FAA can only estimate when these entities will begin to substitute aircraft in their operations at PBI. Given that the conditional ALP approval being granted by the FAA for the runway expansion does not require environmental analysis prior to

issuance, and given the requirement to validate the 2011 FEIS prior to rendering any future decision on the Long-Term AIP, the FAA will have more current information available on this topic at that time.

To clarify the effect of larger aircraft on PBIA operations, the larger aircraft would have wider wingspans, longer lengths, and heavier weights than the aircraft currently operating at PBIA. This increased number of larger aircraft, when operating concurrently with other smaller aircraft, would require that the FAA's ATCT implement arrival and departure procedures that may include, but would not be limited to, increased en-trail separation distances and the "metering" of aircraft arrivals and departures, both of which are based upon the avoidance of aircraft-generated wake turbulence. With the use of these types of ATCT procedures, slight decreases in the overall number of hourly aircraft movements (i.e., landing or departure) have been, and may again be, experienced at PBIA, thereby effectively decreasing the overall ASV capacity of the airfield. It is for this reason that the ASV for the existing airfield was projected to become slightly lower over time. It should be noted that the number and type of larger-sized commercial service aircraft projected to operate at PBIA would be the same for the No-Action Alternative, the Airport Sponsor's proposed AIP, and any other reasonable alternatives at PBIA.

Also see responses to Comments 1-20, 1-67, 1-81, and 1-121.

Letter Codes

FP0008

1-140 **Comment**

In my opinion I do not find the facts and figures in regards to PBIA projections and the actuality "real" numbers to be at all 'true' in nature and comparison. When PBIA has 2008 showing the LOWEST NUMBER of operation ON RECORD over the past 33 years the figures just indicate there is NO JUSTIFICATION for ANY AIRPORT RUNWAY/BUILDING-PROJECTIONS or PROPOSALS for many a year to come. If the numbers were there we would be talking an entirely different scenario but they are just not there and have a clear track record of just NOT being there year after year, CONSISTENTLY DECLINING this isn't just something new in these times, this is a CONSTANT !!!!!.

Response

See response to Comments 1-1, 1-8, and 1-9.

Letter Codes

FP0048

1-141 **Comment**

I have reviewed the DEIS and can see that the basis for adding the expansion was based on wrong data.

Response

See response to Comments 1-8 and 1-9.

Letter Codes

FP0049

1-142 **Comment**

Airport traffic is down – lower traffic does not justify expansion.

Response

See response to Comments 1-1, 1-8, and 1-9.

Letter Codes

FP0050

1-143 **Comment**

The FAA's own data show a continued downward trend in flight operations. Delays at PBIA are minimal to the point that they are a non-issue.

Response

See response to Comments 1-1, 1-8, and 1-9.

Letter Codes

FP0051

- 1-144 **Comment**
Without a pressing or projected need considering airport expansion now or anytime in the foreseeable future is folly and a waste of my hard-earned money.
Response
See response to Comments 1-8, 1-9, 25-1, and 1-33.
Letter Codes
FP0051
- 1-145 **Comment**
I do not see the need for anymore expansion.
Response
See response to Comment 1-1.
Letter Codes
FP0052
- 1-146 **Comment**
Do not allow PBIA to make any further expansion as it is not needed.
Response
See response to Comment 1-1.
Letter Codes
FP0052
- 1-147 **Comment**
There are very clearly NO CAPACITY PROBLEMS AT PBIA!
Response
The FAA agrees that there is no current need at PBIA for the proposed airfield capacity enhancements, and for that reason has decided to grant only conditional ALP approval of the Long-Term AIP at this time.
Letter Codes
FP0053
- 1-148 **Comment**
There has been a steady, noteworthy DECLINE OF AIRPORT TRAFFIC since 1976!!!
Response
See response to Comments 1-1, 1-8, and 1-9.
Letter Codes
FP0053
- 1-149 **Comment**
If there is a true need you build, clearly IF THERE IS NOT A NEED YOU DO NOT BUILD, in this particular case the later is true and quite definable!!!
Response
See response to Comments 1-1 and 1-8.
Letter Codes
FP0053

Palm Beach International Airport FEIS

2. Alternatives

2-1 Comment

The EIS analysis of the alternatives is technically flawed. To evaluate the alternatives the FAA should only use data points within the domain of the 2009 or 2010 TAF. Using imaginary Future Years which have no basis other than that they were the projected years 2013 and 2018 in the 2005 CH2M Hill Projections is not technically sound. The 2005 CH2M Hill Projections have been proven to be entirely inadequate based on actual data.

Response

The intent of the comment is unclear. The FAA interprets the comment to be a challenge to the use of the 2006 forecast of operations as the basis for the analysis of the potential environmental impacts of the alternatives. The following response is provided to address the FAA's understanding of the intent of the comment.

The Near-Term AIP and Near-Term Alternative 2 are evaluated in the FEIS for the year 2015. This 2015 study year provided for a reasonable development schedule for the Near-Term AIP, or Near-Term Alternative 2, from the anticipated date of the FAA's ROD through the design, permitting, and construction phases of the project.

Based on the 2009 FAA approved aviation forecasts for PBIA (2009 FAA TAF), the Long-Term AIP and Long-Term Alternative 2 will not be needed by 2013, the original implementation year that was evaluated in the September 2008 DEIS. Capacity enhancements would be considered by the FAA for unconditional ALP approval only when the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay and, therefore, justify the Long-Term AIP or Long-Term Alternative 2 projects. Because the FAA cannot accurately predict when aircraft operational delay at PBIA may again reach unacceptable levels, the FAA similarly could not definitively identify in the FEIS at what point in time the impacts associated with the Long-Term AIP or Long-Term Alternative 2 would occur. However, the FAA did determine that the potential environmental impacts would be directly related to the number of operations and aircraft type at PBIA. Therefore, for the purpose of disclosing potential environmental impacts associated with the full build-out of the AIP and Alternative 2, the study year by which the Long-Term improvements could be fully constructed and operational was referred to as "Long-Term Study Year 1" or "LTSY 1" in the FEIS and is representative of that point in time when approximately 221,693 annual operations will occur at PBIA. The second future study year evaluated in the FEIS represents a point in time that approximately 238,457 annual operations will occur at PBIA. This second study year provides a reasonable time frame after project implementation to evaluate potential ongoing, operational-only related environmental impacts, such as those associated with aircraft noise and air quality. This second future study year is referred to as the "Long-Term Study Year 2," or "LTSY 2" in the FEIS.

With regard to the timing of the Long-Term components of the AIP or Alternative 2, the FAA acknowledges that environmental, social, and regulatory conditions may change over time and potential environmental impacts and mitigation measures may differ depending on the actual implementation year of capacity enhancements. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0008 FP0024

2-2

Comment

The North County Airport is a better alternative to shift General Aviation away from PBIA.

Response

Development of the North Palm Beach County GA Airport (F45) as a supplement to PBIA was considered in the FEIS, along with nine other commercial and general aviation airports located in Palm Beach County, Broward County, Martin County, St. Lucie County, and Okeechobee County (see Section 3.3.4 of the FEIS). This alternative, by intent, would reduce the overall forecast operational demand levels at PBIA for small GA aircraft only, thus providing a very limited degree of increased capacity at PBIA. However, the evaluation of these airports noted that existing runway lengths, aviation facilities, and aviation services would not accommodate the type of general aviation activity currently supported at PBIA without substantial new development, including new runways and major runway extensions.

Also, regarding the use of another airport, it should be noted that the FAA does not have the authority to direct or place influence upon general aviation aircraft operators to shift their activity and services from one airport to another or to operate at specific times of the day. Although the Airport Sponsor may have the authority to designate specific airports within an airport system as commercial service only, in this instance the other airports in the system do not provide adequate facilities for the types of large general aviation aircraft using PBIA. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the general aviation fleet that operates at PBIA or any other public use airport.

Letter Codes

FP0030

2-3

Comment

Build a new airport further north....please!

Response

As an alternative to the AIP, the FAA evaluated the development of a new commercial service airport to replace PBIA (see Section 3.3.3 of the FEIS). This alternative concept was recommended by members of the public during the FAA's Scoping process, during the Alternatives Public Workshop, and during the FAA's Focus Group meeting on the alternatives evaluation process. Development of a new or replacement commercial service airport alternative consists of the construction and operation of an entirely new airport facility on an undeveloped or "greenfield" site, or taking an existing airport facility and re-developing it into a commercial service airport.

The FAA is not an airport sponsor and the FAA does not own or operate airports. The decision to construct a new airport facility does not lie with the FAA, but rather with an operating body, such as a state, county, city, or airport authority. The request for the FAA to consider the development of a new airport facility must come from one of these entities, which is what is known as a "willing airport sponsor." Also, the FAA does not have the authority to shift operations from one airport to another. Since the deregulation of the airline industry, airlines are free to choose which airports they want to operate from and the levels of service that they provide at each facility. Likewise, GA owners/operators are free to decide which airport they want to be based at and which airports they want to operate to and from. Consequently, it is not within the FAA's purview to propose the development of a new airport, and, even if a new airport were built, the FAA does not have the authority to shift commercial service, air cargo service, or GA operations from PBIA to a new airport. Although the Airport Sponsor may have the authority to designate specific airports within an airport system as commercial service only, in this instance the other airports in the system do not provide adequate facilities for the types of large GA aircraft using PBIA. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the GA fleet that operates at PBIA or any other public use airport.

Given that there is no "willing airport sponsor," and the fact that FAA cannot shift either commercial or GA operations from one airport to another, there is no evidence that the development of a new airport facility would enable PBIA to accommodate the operational levels identified in the FEIS to reduce operational delay to acceptable levels at PBIA. Therefore, this alternative did not meet the Purpose and Need for the AIP and it was not retained for further consideration in the EIS process.

Letter Codes

FP0034

2-4 **Comment**

The private planes make a lot of noise. They should be flying out of another airport in another area of the county to at least spread the noise around. We should not get the whole load. It is not fair.

Response

The FAA does not have the authority to direct or place influence upon general aviation aircraft operators to shift their activity and services from one airport to another or to operate at specific times of the day. Although the Airport Sponsor may have the authority to designate specific airports within an airport system as commercial service only, the other airports in the system do not provide adequate facilities for the types of large general aviation aircraft using PBIA. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the general aviation fleet that operates at PBIA or any other public use airport. Also, please see response to Comments 2-2 and 2-3.

Letter Codes

FP0036

2-5 **Comment**

Another option would be to fly the planes up and down the same direction as the interstates cover. They are already there we as taxpayers own the space and it is already a traffic pattern with noise and most of the land is for commercial use. When people go home they can then be at Pease[sic].

Response

FAA completed a redesign of airspace in South Florida in 2005 that provides more en-route capacity for air traffic and helped reduce delays at South Florida airports (see Section 1.2 of the FEIS). This redesign improved the north/south flow of aircraft along Florida's east coast.

The FAA exercises its authority to manage the use of the navigable airspace in a manner consistent with all applicable Federal laws. All aircraft operations at PBIA are conducted in accordance with Federal Aviation Regulations that prescribe the safe operations to and from the airport terminal airspace.

Letter Codes

FP0036

2-6 **Comment**

No other commercial airport in this country the size of PBIA or larger has built a new runway so close to an existing runway because it makes absolutely no sense.

Response

The FAA notes that many other commercial service airports in the United States operate with closely-spaced parallel runways (800 to 1,000 feet of separation). A small example of commercial service airports with closely-spaced parallel runways includes the San Francisco International Airport, William P. Hobby Airport – Houston (HOU), and Houston George Bush Intercontinental Airport.

Three widely-spaced parallel runway configurations were evaluated in the FEIS (see Section 3.3.6), but were found to be cost-prohibitive at PBIA due to relocations of substantial airport and/or commercial developments. Although the proposed 800-foot spacing would not allow independent, simultaneous operations, the Long-Term AIP runway configuration would provide parallel runways for arrivals and departures. Computer modeling (SIMMOD™) of the AIP shows that the closely-spaced dependent runway configuration would indeed increase airfield capacity at PBIA and reduce delay to acceptable levels.

Letter Codes

FP0039

2-7 **Comment**

But even if a new runway was needed, which it is not, all the Airport would have to do is lengthen the already existing diagonal runway (13/31), which is a project that could be done at very little cost and would give a much better result in terms of wind direction.

Response

The FEIS evaluated similar alternatives that lengthened and increased the use of Runway 14/32 (Scoping Alternative and Alternative 1). The Scoping Alternative did not meet the Level 1 Purpose and Need criteria for the Long-Term AIP; therefore, it was not considered to be a reasonable alternative and it was not retained for further evaluation in the FEIS. Alternative 1 would provide adequate hourly capacity to meet the hourly demand at PBI. However, this alternative would not provide adequate annual capacity to accommodate the aircraft operational levels discussed in the FEIS. As a result of the deficiency in annual capacity, this alternative would not reduce average delay per aircraft operation to acceptable levels when operations reach the levels identified in the FEIS. Because Alternative 1 did not meet all of the Level 1 Purpose and Need criteria for the Long-Term AIP, it was not considered to be a reasonable alternative and it was not retained for further consideration in the FEIS.

FAA disagrees that Runway 14/32 would provide "much better result in terms of wind direction." A review of wind rose data on the PBI ALP shows that the east/west parallel runways have slightly better wind coverage than crosswind Runway 14/32 during All-Weather and VFR conditions. During IFR conditions, wind coverage slightly favors Runway 14/32, but only by 2 percent.

Letter Codes

FP0039

2-8 Comment

None of the many buildings which would need to be demolished under the Pelly plan for a new runway would have to be touched.

Response

As noted in Section 3.4.3 of the FEIS, to comply with airfield design standards and FAA Runway Protection Zone land use compatibility guidelines, the Long-Term AIP would require the relocation of FBO and general aviation support facilities that may still be located in the southeast quadrant of the airport. These mandatory relocations would become necessary if the Long-Term AIP is again justified, receives FAA unconditional ALP approval, and is implemented by the Airport Sponsor. However, voluntary FBO relocations, including all or part of their respective operations, may be undertaken by FBOs to meet customer demands prior to runway improvements becoming ripe for decision.

Letter Codes

FP0039

2-9 Comment

Another alternative would be regular use of fanning departures, which can be accomplished at absolutely no cost. This would allow more airplanes to take off at much quicker intervals. It is also the preferred plan of almost all impacted residents and businesses, and would go a long way toward solving the damage to Mar-a-Lago and resulting liability of the County.

Response

"Fanning" of departing aircraft (also referred to as "alternate departure headings") is used by PBI ATCT to increase capacity and reduce delay at PBI during peak operational periods. Increased use of alternate departure headings was evaluated in the EIS. Airfield simulation modeling analyses conducted for the EIS concluded that "fanning" does have some beneficial effect at PBI, but would not increase the annual and hourly capacity of the airfield sufficiently to reduce average aircraft operational delay to acceptable levels.

Letter Codes

FP0039

2-10 Comment

Yet another alternative is the expansion of the North County Airport in accordance with the County's 2006 Plan so that it can accommodate a significant portion of the private jets that now use the Airport, which would cost only a few million dollars.

Response

The Master Plan for the North County Airport (F45) notes that its runway length analyses considered light jets and medium-sized jets expected to use the airport. The report further states that meeting “the needs of the small and mid-size jets, along with the piston and turbo-prop market, is consistent with the role that F45 needs to play in the region, given limitations emerging at PBI and those that preclude such a role at LNA.” The Master Plan also notes that the proposed length of 6,000 feet for Runway 13/31 would enhance the capability of the airport to act in its role as a reliever facility to PBI, while at the same time balancing the length of the extension with a realization that while additional length could have been recommended and justified, the proposed extension is a reasonable and economically realistic enhancement that does not duplicate facilities available within the Palm Beach system of airports. In this regard, the FAA notes that the Airport Sponsor’s goals are to serve commercial and large general aviation aircraft at PBIA, not at the North County Airport.

In regard to development plans for the North County Airport, as discussed in Section 3.3.4 of the FEIS, the Airport Sponsor’s staff has informed the FAA that the North County Airport is subject to a Development Order that limits the expansion. The Development Order restricts airport development within two major environmental preserve areas situated immediately off the east and west ends of parallel Runways 8R/26L and 8L/26R. The location of the preserves and their protection in perpetuity, in conjunction with manmade facilities east of the airport (CSX railroad and SR 710), limit consideration of the extension of either parallel runway beyond its current length. Although the Airport Sponsor may explore potential expansion options at the North County Airport during normal management actions or through the update of its Master Plan, the Airport Sponsor has not informed the FAA that the Development Order is subject to revision or that the County would seek to expand the airport. Please see response to Comment 2-2.

Letter Codes

FP0039

2-11

Comment

The new runway would require the demolition of two state-of-the-art FBO facilities, Signature and Jet Aviation. Tearing down the two FBOs will actually create longer delays because of longer taxi times to the new locations.

Response

The need to remove and relocate hangars in the southeast quadrant of the airfield is explained in Footnote #9 on page 1-23 of the FEIS. The note explains that to comply with airfield design standards and FAA Runway Protection Zone land use compatibility guidelines, the Long-Term AIP would require the relocation of FBO and general aviation support facilities that may still be located in the southeast quadrant of the airport. These mandatory relocations would become necessary if the Long-term AIP is again justified, receives FAA unconditional ALP approval, and is implemented by the Airport Sponsor. However, voluntary FBO relocations, including all or part of their respective operations, may be undertaken by FBOs to meet customer demands prior to runway improvements becoming ripe for decision. Regarding taxi times, please see response to Comment 2-13.

Letter Codes

FP0039

2-12

Comment

The proposed new runway will be so close to the existing main runway that there would be significant operational restrictions that would prevent the runway from creating any real additional capacity.

Response

Although the proposed 800-foot spacing would not allow independent, simultaneous operations, the Long-Term AIP’s proposed runway configuration would provide parallel runways for arrivals and departures. Even though operations would be dependent, computer modeling shows that PBIA would experience a substantial increase in capacity and would reduce delay at the airport to acceptable levels.

Letter Codes

FP0040

2-13 **Comment**

The proposed new runway would require all landing aircraft to taxi across the main runway to reach the terminal or the two new FBOs, and taxi times would increase.

Response

Operational delay at PBI, which includes aircraft taxi time, would not increase as a result of either the Long-Term AIP or Long-Term Alternative 2. As discussed in Section 2.5.2 of the FEIS, aircraft operational delay levels at PBI for the then-existing and projected levels of aircraft operational demand (based on the PBI 2006 MPU forecasts), were calculated using SIMMODTM. The runway/taxiway simulations presented in the FEIS considered taxi times for both commercial and general aviation aircraft under the No-Action Alternative, as well as the Long-Term AIP and Long-Term Alternative 2. SIMMODTM is an industry standard analysis tool used by airport planners and operators, airlines, airspace designers, and air traffic control authorities for conducting high-fidelity simulations of current and proposed airport and airspace operations. SIMMODTM takes into account airport-specific conditions that effect taxi time, such as runway and taxiway configurations, proximity of runway intersection(s), and local operational considerations. Results of the SIMMODTM analysis indicate that taxi times would be reduced under the Long-Term AIP or Long-Term Alternative 2 when compared to the No-Action Alternative. The FAA Airports Division (ARP) coordinated with Air Traffic Organization (ATO) and PBI ATCT in regards to aircraft ground movements and taxi times. FAA ATO and ATCT concurred and indicated it would improve their ability to operate ground movements on the airfield more efficiently.

Letter Codes

FP0040

2-14 **Comment**

There are alternative ways to increase capacity and decrease any possible delays at far less cost.

- Increase use of fanning.
- Develop North County Airport according to the County's 2006 plan so it can be used by small and medium private jets, which will reduce private jet operations at the Airport.
- Lengthen the Diagonal Runway from 7,000 to 8,000 feet.

Response

Please see responses to Comments 2-9, 2-10, and 2-7.

Letter Codes

FP0040

2-15 **Comment**

The FEIS states a total cost of \$370 million in 2007 dollars. But there is no cost detail. The stated cost does not include the cost of rebuilding two FBOs, which will be at least \$100 million.

Response

Although NEPA does not require a financial or Cost/Benefit Analysis, the FAA did consider cost information when evaluating potential alternatives. The FAA reviewed the Airport Sponsor's Capital Improvement Plan and updated and/or prepared conceptual cost estimates for the proposed AIP and its alternatives. For comparison purposes and for the Level 2 evaluation of alternatives, conceptual cost estimates for the No-Action Alternative, the AIP, Alternative 2, and Alternatives A-3, A-8, A-9, A-11, A-13, A-14, and A-15 were summarized and included in the FEIS. The FAA did not have access to detailed information that would permit the development of cost details or an itemized breakdown of costs in the FEIS. The level of planning and design necessary to develop detailed cost estimates is not typical at this stage of the NEPA process. However, the FAA found the information provided by the Airport Sponsor to be reasonable for the purposes of comparative alternatives evaluation. The FAA reviewed the comment regarding potential hangar construction costs and determined that, if the cost cited by the Commenter were added to the conceptual cost estimate for the AIP, it would have had no effect on the outcome of the alternatives analysis or selection of the Preferred Alternative.

Letter Codes

FP0040

- 2-16 **Comment**
There is no cost benefit analysis. The cost will be no more than \$500 million; there would be little or no benefit.
Response
NEPA does not require a financial or Cost/Benefit Analysis. As stated in Section 1502.23 of CEQ Regulation 1502, "For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations." However, a Cost/Benefit Analysis may be required at such time that the Airport Sponsor requests Federal funding for the Long-Term AIP.
Letter Codes
FP0040
- 2-17 **Comment**
Plan will have unacceptable environmental impacts that are not disclosed or properly analyzed.
1. Noise
 2. Pollution from aircraft engine emissions.
- Response**
In preparing the FEIS, and in accordance with CEQ, NEPA, and FAA Orders 1050.1E and 5050.4B, the FAA has rigorously and objectively evaluated the potential impacts of the No-Action Alternative, the overall AIP, and Alternative 2, and has used the best information available during the time of the preparation of the FEIS. The noise model and air emissions models used in the FEIS represent the "state-of-the-art" models for these types of analyses. They are used consistently by the FAA for all EA and EIS studies.
- In response to community concerns for these two specific impact categories, the FAA conducted additional analyses including supplemental noise metrics analyses and air deposition analysis that supplemented the level of analysis required by FAA in its NEPA guidance. See Section 5.2, Air Quality, and Section 5.12, Noise, of the FEIS for further information.
- Letter Codes**
FP0040
- 2-18 **Comment**
It is our understanding that due to typical air space conditions, as a practical matter, whenever congestion occurs, commercial airlines essentially have priority over private jets for take-offs. If this is not the current tower policy, it could be easily implemented, and the FEIS does not suggest otherwise. This would completely eliminate any delays of commercial airline traffic.
- Response**
While ATO has the latitude to prioritize commercial airlines for take-offs at PBIA, it is standard air traffic control procedure at PBIA, as well as other airports that departures are assigned on a first-come, first-served basis during periods of congestion. Studies at hub airports evaluated the practices by which the FAA allocates and assigns priority in the management of air traffic to see if different priorities could lead to more efficient operations and reduced delay. These studies have included: (1) setting aside specific capacity allocations to aircraft that meet technical criteria in order to increase aircraft throughput, (2) assigning priorities to flights in advance of traffic flow management delay programs, and (3) restricting access at certain times to scheduled commercial operations only. While these operational procedures may be useful in reducing delays for commercial traffic at many airports, their value in reducing delay at PBIA would be negligible because GA operations constitute a large percentage of the total operations at the Airport.
- Letter Codes**
FP0040
- 2-19 **Comment**
The FEIS analysis ignores the increases in taxi time that would be created by the addition of the new runway. All airlines landing on the new runway would have to cross the main runway to reach the

terminal. All incoming private jets would also have to cross the main runway to reach the two FBOs relocated to Golfview. Arriving airliners would have to cross the existing main runway to reach the terminal.

Response

Please see response to Comment 2-13.

Letter Codes

FP0040

2-20 **Comment**

The situation for private jets would be even worse, because two FBOs will be relocated to the far northwest corner of the Airport. In contrast, private jets now departing from the two FBOs currently located on the south side of the field have a very short taxi to reach the main runway.

Response

Please see response to Comments 2-11 and 2-13.

Letter Codes

FP0040

2-21 **Comment**

The FEIS erroneously asserts that that the proposed new runway would increase operational capacity and therefore reduce delays. However, the FEIS ignores the fact that the proposed new runway will have little or no ability to decrease future theoretical delays. This is because the distance between the proposed runway and the existing main runway would only be 800 feet, centerline to centerline.

Response

Although the proposed 800-foot spacing would not allow independent, simultaneous operations, the Long-Term AIP runway configuration would provide parallel runways for arrivals and departures. Even though operations would be dependent, computer modeling shows that PBIA would experience a substantial increase in capacity and would reduce delay at the airport to acceptable levels.

The Airport Sponsor's development of the Long-Term AIP in its Master Plan was coordinated with PBIA ATCT, the FAA, and users of the airport. The FAA, in preparing the FEIS, coordinated with the PBIA ATCT regarding the 800-foot spacing of the proposed runway. This coordination documented that the new runway would increase airfield capacity at PBIA and reduce delay to acceptable levels. See also response to Comment 1-95.

Letter Codes

FP0040

2-22 **Comment**

Although FAA regulations allow an airport to construct two runways with a minimum 800 feet of separation, we are not aware of a single commercial airport in the country that has done so. That is because other FAA regulations do not allow simultaneous operations on both runways that are so close together. See AC 150/5300, Chapter 2. These operational restrictions are necessary to ensure the safe operations of airplane traffic.

Response

The FAA notes that many other commercial service airports in the United States operate with closely-spaced parallel runways (800 to 1,000 feet of separation). A small example of commercial service airports with closely-spaced parallel runways includes the San Francisco International Airport, William P. Hobby Airport – Houston, Cleveland Hopkins International Airport, Miami International Airport, and Houston George Bush Intercontinental Airport.

The Commenter is correct that simultaneous operations on closely-spaced runways are not allowed. However, the FAA does allow dependent operations on closely-spaced runways. Also see response to Comment 2-21.

Letter Codes

FP0040

2-23 **Comment**

All parallel runways that have been constructed in this country in the last several decades have been thousands of feet apart so there can be simultaneous operations on both runways, which allow an airport to handle additional traffic and reduce delays.

Response

It is factually incorrect to state that "All parallel runways that have been constructed in this country in the last several decades have been thousands of feet apart." For example, the new third parallel runway at Sea-Tac International Airport which opened in November 2008 has a runway separation of only 1,700-feet. In addition, a number of future runway development projects such as the recently approved Runway 9R/27L at Philadelphia International Airport will have a runway separation of 1,600 feet from the existing parallel Runway 9C/27C. Where physically, environmentally, and financially possible, construction of a new widely-spaced runway (i.e., 4,300 feet of separation) would be preferred at most airport locations with airfield capacity issues as it allows independent, simultaneous operations. However, the construction of widely-spaced runways is not possible, or necessary, in all cases.

Letter Codes

FP0040

2-24 **Comment**

If there were a new runway, the two east/west runways would be treated as a single runway when wake turbulence is a factor, which is always the case with jet aircraft. There could not be a simultaneous take off and landing on each runway. If an aircraft is in position to take off, it must wait until the aircraft landing on the other runway has touched down. The departing aircraft can be released for take off while the landing aircraft is still on the other runway. Takeoff and landing restrictions and delays are exponentially worse in bad weather.

This is why no airport in the country has built two minimally separated parallel runways in decades. Every other airport has been smart enough to realize that there is little or no advantage to be gained from two narrowly spaced parallel runways. The County recognized this fact when it studied and rejected the possibility of adding a second parallel runway in 1998. The County concluded that it would be completely impractical. The FEIS does not mention, much less explain the County's flip-flop on this issue.

Response

In the case of the Long-Term AIP, the existing 10,000-foot Runway 10L/28R would be used primarily for departures and the proposed expanded and relocated Runway 10R/28L would be used for arrivals. The arrival and departures on each runway would be dependent in regard to spacing and separation standards.

The referenced 1998 Final Environmental Assessment for the extension of Runway 9L/27R at PBIA did not consider building a new closely-spaced east/west parallel runway. The EA considered the development of a widely-spaced 10,000-foot runway capable of dual simultaneous independent operations. The FAA does not believe that the purpose and need or the alternatives considered in the 1998 Final EA are comparable in any respect to the purpose and need or the alternatives considered in the FEIS. Furthermore, the widely-spaced parallel runway alternative considered in the 1998 Final EA did not fulfill all of the Purpose and Need criteria established in the EA and it was not considered to be a reasonable alternative for the proposed project. Similarly, the 2001 PBIA Strategic Master Plan Study did not consider building a new closely-spaced east/west parallel runway, but did consider the lengthening and conversion of Runway 9R-27L to an air carrier runway. Please also see response to Comments 2-22 and 2-23.

Letter Codes

FP0040

2-25 **Comment**

Ft. Lauderdale Airport recently considered various ways to expand its capacity. In 2008, Ft. Lauderdale rejected the possibility of building two narrowly spaced parallel runways due primarily to the operational limitations, and is building a new runway widely separated from the existing main runway.

Response

The FAA recognizes the benefit of widely-spaced parallel runways with respect to both capacity and airport operation improvements, and Section 3.3 of the FEIS identifies a number of widely-spaced runway configurations which were evaluated as part of the EIS process at PBIA. Analysis documented in the FEIS indicates that these alternatives could provide adequate annual and hourly capacity to accommodate operational levels and could reduce delay to acceptable levels. However, each of the widely spaced parallel runway configurations evaluated were not considered to be reasonable or practicable due to complexities of construction, unacceptable disruptions to existing airport areas and major roadways, socioeconomic impacts, and cost.

Letter Codes

FP0040

2-26 Comment

The limited operations available with closely spaced parallel runways can be contrasted with the widely spaced parallel runways that are found at almost all of the largest airports in the country, including Miami, Dulles, or JFK. When the two runways are separated by thousands of feet, there can be simultaneous takeoffs on both runways, or simultaneous landings on both runways, or a simultaneous takeoff on one and a landing on the other. This is a major advantage in handling air traffic at large congested airports.

Response

The FAA acknowledges the benefits of widely-spaced runways, especially at the large-hub airports mentioned by the Commenter. In regard to why widely-spaced runways are not proposed at PBIA, see response to Comments 2-24 and 2-25.

Letter Codes

FP0040

2-27 Comment

The FEIS ignores the fact that the proposed runway would cause increased ground delays because of the additional taxi time needed to move an arriving airliner from the new runway, across the existing main runway, to the terminal. Private aircraft will also have longer taxi times because two FBO facilities will be demolished and rebuilt in the northwest corner of the Airport known as Golfview, which will cause increased taxi time from the new runway.

Response

Please see response to Comment 2-13.

Letter Codes

FP0040

2-28 Comment

Air traffic control would have to take additional precautions in coordinating takeoffs and landings because after aircraft land, they would have to cross over the active main runway to reach the terminal. The increased danger to passengers cannot be justified in light of the fact that there is no current or foreseeable need for a new runway at the Airport.

Response

The FAA disagrees with the Commenter's statement that the airfield development associated with the Long-Term AIP would increase danger or present an unsafe condition at PBIA. Planning by the Airport Sponsor and the independent evaluation of the Long-Term AIP by the FAA both included discussions with the PBIA ATCT in regard to how the ATCT would route and handle aircraft if the Long-Term AIP was implemented. Overall, the ATCT indicated the Long-Term AIP would improve the efficiency of the airfield and improve its ability to accommodate aircraft operations during peak periods. See response to Comment 2-13.

Letter Codes

FP0040

2-29 Comment

The FEIS failed to adequately analyze the use of fanning, the expansion of the North County Airport, and the expansion of the Diagonal Runway. All of these alternatives, individually and collectively, would

do far more to alleviate any possible future Airport congestion, and do so more efficiently and economically than building a new runway, and demolishing and relocating two FBOs. All these alternatives should be implemented.

Response

Operational and demand management alternatives to the AIP (including “fanning”), expansion of the North County Airport, and expansion of Runway 14/32 were all alternatives which were evaluated in the FEIS. Sections 3.3.5, 3.3.4, and 3.3.6, respectively, of the FEIS provide a detailed discussion of these measures. Results of the alternatives analysis performed for the FEIS indicate that none of these alternatives would increase the capacity of the airport to accommodate the operational levels identified in the FEIS or reduce average delay per aircraft operation to acceptable levels resulting from potential future operational levels. Therefore, fanning and/or other operational and demand management procedures, use of other airports, and expansion of Runway 14/32 measures were not retained for further consideration by the FAA in the EIS process. Please see response to Comments 2-7, 2-10, and 2-31.

Letter Codes

FP0040

2-30 **Comment**

Fanning, which the County has irrationally opposed, substantially reduces the take off separation interval.

Response

The use of fanning to reduce operational delay at PBIA is discussed in Section 3.3.5 of the FEIS. FAA notes that it is not the Airport Sponsor, but the PBIA ATCT that determines, if and when, fanning is used during peak periods at PBIA.

Fanning utilizes divergent course separation rather than providing 3 mile en-trail separation for departing aircraft. Air traffic and weather permitting, air traffic controllers may elect to direct aircraft to turn to the left or right (a minimum course change of 15 degrees) from the runway heading to expedite the departure flow of aircraft. This increased aircraft departure rate is realized by utilizing diverse departure headings that serve to decrease the required aircraft separation requirements while maintaining safety. Although the use of alternative departure headings (fanning) is currently used during peak departure periods at PBIA to relieve congestion, this alternative would not increase the annual and hourly capacity of the airfield to reduce average aircraft operational delay to acceptable levels. Also see response to Comment 2-31.

Letter Codes

FP0040

2-31 **Comment**

Fanning generally allows three aircraft to take off in the time that only one aircraft can take off with no fanning. That is why the FAA tower orders fanning departures during peak times in order to reduce congestion, and because fanning is also safer.

Response

Fanning utilizes divergent course separation rather than providing 3 mile en-trail separation for departing aircraft. Airfield simulation modeling analyses conducted for the EIS concluded that “fanning” does have some beneficial effect at PBIA, but would not increase the annual and hourly capacity of the airfield sufficiently to reduce average aircraft operational delay to acceptable levels in the future as operational levels increase. Through the use of the SIMMOD™ airfield simulation model, it was determined that the short-term capacity benefits of fanning realized during peak departure periods would not occur when activity levels increase to the projected levels of approximately 221,000 annual aircraft operations. This is due to the fact that periods of increased departure demand would also include increased arrival demand to Runway 10L/28R. Therefore, multiple departures (which would benefit from the fanning procedure) could not occur without delaying arriving aircraft. Based on these considerations, the FAA has determined that this alternative would not meet the Purpose and Need criteria and; therefore, this alternative was not retained for further consideration.

Letter Codes

FP0040

- 2-32 **Comment**
The FEIS contains a chart which shows that fanning reduces departure delays by about 30%. App. B-4. However, the forecasts of delay in the FEIS assume that there is no fanning. A change in that assumption to use fanning would reduce delays by 30%, destroying the supposed rationale for a new runway.
Response
The analysis of operational delay at PBIA was evaluated using SIMMOD™. Inputs to the SIMMOD™ analysis included both current and proposed airfield and airspace operations. The PBIA ATCT did use fanning during the periods of delay experienced in the 2005 to 2006 time frame. For that reason, the use of fanning was considered as part of the routine airfield operating procedures in the evaluation of operational delay and alternatives at PBIA. See Section 3.3.5 of the FEIS and response to Comment 2-31.
Letter Codes
FP0040
- 2-33 **Comment**
The use of fanning as a general procedure would not require any additional infrastructure or costs, and would save approximately \$500 million. The FAA tower currently uses fanning when necessary to reduce delays; there is no reason for the FEIS to reject fanning.
Response
Please see response to Comment 2-31.
Letter Codes
FP0040
- 2-34 **Comment**
The FEIS rejects fanning without detailed analysis because "it was determined that the short-term capacity benefits of fanning realized during peak departure periods would not occur when activity levels increase to the projected levels of approximately 221,000 annual aircraft operations." FEIS at ES-50 (emphasis added). However, the Airport is nowhere near this level of operations, and is not projected to be at that level for at least 20 years, if ever. Therefore, the Airport should implement more extensive use of fanning procedures now, which will minimize delays and maximize safety, and the FEIS does not suggest otherwise.
Response
Please see response to Comment 2-31. Air traffic control at PBIA presently uses fanning to reduce operational delay at PBIA and there is no reason to expect this practice to be discontinued in the future. It should be noted that the practice of fanning is contrary to the informal noise abatement departure procedure enacted by the Airport Sponsor in 1997 after its recommendation in the Airport's Part 150 Noise Compatibility Study. Regarding the current need for capacity enhancements at PBIA, please see response to Comment 1-1.
Letter Codes
FP0040
- 2-35 **Comment**
Another alternative to building the proposed new runway is to lengthen the diagonal runway (14/32) from 6,932 feet to approximately 8,000 feet, making it the same length as the proposed new runway. This would add at least as much capacity as the proposed new runway at a substantially lower cost of approximately \$5 million. In fact, the FEIS concedes that expanded use of the diagonal runway at its current length would reduce any future delays that may occur.
Response
The FEIS does not concede that "that expanded use of the diagonal runway at its current length would reduce any future delays that may occur." The FEIS evaluated similar alternatives that lengthened and increased the use of Runway 14/32 (Scoping Alternative and Alternative 1). The Scoping Alternative did not meet the Level 1 Purpose and Need criteria for the Long-Term AIP; therefore, it was not considered to be a reasonable alternative and it was not retained for further evaluation in the FEIS. Alternative 1 would provide adequate hourly capacity to meet the hourly demand at PBIA. However,

this alternative would not provide adequate annual capacity to accommodate the aircraft operational levels discussed in the FEIS. As a result of the deficiency in annual capacity, this alternative would not reduce average delay per aircraft operation to acceptable levels when operations reach the levels identified in the FEIS. Because Alternative 1 did not meet all of the Level 1 Purpose and Need criteria for the Long-Term AIP, it was not considered to be a reasonable alternative and it was not retained for further consideration.

The FAA also questions whether the Commenter's \$5 million cost estimate for the extending Runway 14/32 by 1,068 feet and, including all necessary connected actions (i.e., taxiway extensions, NAVAID installation, etc.), is reasonable.

Letter Codes

FP0040

2-36 **Comment**

And unlike the proposed new runway, the Diagonal Runway is easily accessible from the airline passenger terminal. It would also be easier for private jets to access the Diagonal Runway from the existing FBOs than it would for them to access the proposed new runway from the relocated FBOs.

Response

Although Runway 14/32 has a shorter taxi distance from the passenger terminal for aircraft departing to the south and shorter taxi distance for GA aircraft departing to the north, the FAA's discussions with the PBIA ATCT indicate that a majority of pilots departing PBIA would prefer an east/west runway as opposed to Runway 14/32. This is because of prevailing winds at PBIA and because most departures at PBIA head in a northerly direction.

Letter Codes

FP0040

2-37 **Comment**

The FEIS states two concerns about the expansion and greater use of the Diagonal Runway. Lengthening the Diagonal Runway to 8,000 feet will require the Airport to acquire "some" additional land to the north. The FEIS's cursory seven line "analysis" fails to explain why this would not be possible, or what it would cost. There is no reason to believe that the Airport could not acquire the necessary land at a reasonable cost.

Response

The FAA assumes the Commenter is referring to the discussion of Alternative 1 in the Executive Summary of the FEIS. The FAA directs the Commenter to the discussion and evaluation of Alternative 1 in the main body of the FEIS for a more detailed discussion and evaluation. Because Alternative 1 did not meet all of the Level 1 Purpose and Need criteria, it was not considered to be a reasonable alternative and it was not retained for further consideration in the Level 2 analysis, which would have evaluated, among other criteria, land acquisition needs, road relocations, and planning level cost. Based on the conceptual layout of Alternative 1, the FAA disagrees that the Airport Sponsor "could acquire the necessary land at a reasonable cost."

Letter Codes

FP0040

2-38 **Comment**

The FEIS itself proposes to extend the northwest end of the diagonal runway by 480 feet. This would lengthen the diagonal runway to 7,412 feet. The FEIS does not state that there will be any difficulties, financial, operational, or otherwise in doing so. Adding another 500 feet would be just as feasible. There is no requirement for 8,000 feet, it is simply an optimal number to allow airliners to land with greater margins for error when runways are wet, or other adverse weather conditions.

Response

The Long-Term AIP would extend Runway 14 by 480 feet. The project would also shorten Runway 32 by 3,412 feet for an overall runway length of 4,000 feet – not the 7,412 stated by the Commenter.

As discussed in the FEIS, the proposed extension of Runway 14 was limited to 480 feet so it would be constructed on airport property and would not cross Belvedere Road.

In regard to the statement that “there is no requirement for 8,000 feet of runway” and it is “simply an optimal number,” the FAA notes that the Airport Sponsor analyzed runway landing and take-off requirements for the proposed new runway at PBIA and FAA independently reviewed the information and found it to be reasonable for supporting the runway lengths depicted on the Airport Layout Plan.

Letter Codes

FP0040

2-39 **Comment**

The second concern in the FEIS is that simultaneous take offs and landings cannot be conducted on intersecting runways. However, the FEIS ignores the fact the simultaneous take offs and landings cannot take place on the two closely spaced parallel runways proposed in the FEIS.

Response

The Airport Sponsor’s proposed AIP is not intended to allow for simultaneous take-offs and landings. See response to Comments 2-21, 2-22, and 2-23.

Letter Codes

FP0040

2-40 **Comment**

It is irrational to spend hundreds of millions of dollars on the proposed new runway when it [Airport] can achieve the same perceived benefits by lengthening the existing diagonal runway at a fraction of the cost.

Response

See response to Comments 2-35 and 2-38.

Letter Codes

FP0040

2-41 **Comment**

In its October 2006 Master Plan Update, the County proposed to expand North County airport to handle most of the types of small and medium size private jets that now use PBIA. Since private jets account for two-thirds of the total operations at the Airport, any purported future delays at the Airport will be attributable primarily to private jets, not commercial airliners. A significant amount of this private jet traffic could and should be shifted to the North County Airport instead of building a new runway at PBIA.

Response

The Master Plan for the North Palm Beach County General Aviation Airport (F45 and also referred to as “North County Airport”) notes that its runway length analyses considered light jets and medium-sized jets which are expected to use the airport. The report further states that meeting “the needs of the small and mid-size jets, along with the piston and turbo-prop market, is consistent with the role that F45 needs to play in the region, given limitations emerging at PBI and those that preclude such a role at LNA.” The Master Plan also notes that the proposed length of 6,000 feet would enhance the capability of the airport to act in its role as a reliever facility to PBIA, while at the same time balancing the length of the extension with a realization that while additional length could have been recommended and justified, the proposed extension is a reasonable and economically realistic enhancement that does not duplicate facilities available within the Palm Beach system of airports. In this regard, the FAA notes that the Airport Sponsor’s goals are to continue to serve commercial and large general aviation aircraft at PBIA.

Many general aviation aircraft require runway lengths in excess of 6,000 feet for departures. It is unlikely, based on the performance characteristics of these aircraft that they would prefer to use the North County Airport or use the airport and accept operational restrictions imposed by the shorter runway length than that available at PBIA.

The comment assumes that essentially all small and medium-size “private jet traffic” that now use PBIA would shift to North County Airport, if the improvements proposed in that airport’s October 2006 Master Plan Update, were implemented. Based on that assumption, the comment concludes that the new

runway would not be needed at PBIA. The assumption that a majority of small and medium-size private jet owners would shift from operating at PBIA to operating at North County Airport is not supported. Many aircraft owners choose to use PBIA because of its proximity to business centers, high-end housing, and recreational resources. In regard to the small and medium-size jets, some may elect to relocate to the North County Airport if the Master Plan was implemented and the runway was extended to 6,000 feet in length. However, the number of aircraft operations that would need to be shifted from PBIA to North County Airport would have to be substantial to offset the conditions that resulted in aircraft operational delay at PBIA. The FAA would not expect this large-scale shift to occur if a 6,000-foot runway was available at the North County Airport. This is due to the level of FBO services provided at PBIA and the fact that the Palm Beach area is a destination for many visitors, a runway extension at F45, in and of itself, would not divert enough small and medium jet traffic from PBIA to eliminate the need for the Long-Term capacity enhancements at PBIA. Given a choice, a traveler using general aviation aircraft would not be expected to land at North County Airport and drive the distance (approximately 14 miles) to West Palm Beach, or its surrounding communities, when they can land at PBIA and be within a couple of miles of their destination.

With regard to shifting private jet traffic to North County Airport, it should be noted that the FAA does not have the authority to direct or place influence upon general aviation aircraft operators to shift their activity and services from one airport to another or to operate at specific times of the day. Although the Airport Sponsor may have the authority to designate specific airports within an airport system as commercial service only, in this instance the other airports in the system do not provide adequate facilities for the types of large general aviation aircraft using PBIA. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the general aviation fleet that operates at PBIA or any other public use airport.

Letter Codes

FP0040

2-42 **Comment**

For less than \$10 million, North County could be improved by extending its runway to accommodate small and medium private jets and constructing a control tower. It is reasonable to believe that a significant portion of the current private jet traffic at the Airport would voluntarily relocate to North County because of its location and lower costs.

Response

The Commenter provides no basis in their submittal for the \$10 million cost estimate to improve North County Airport to accommodate relocated GA jet activity from PBIA. The FAA understands that developing additional and/or expanded aviation facilities at the North County Airport could cost less than the Airport Sponsor's Long-Term AIP. The FAA disagrees, however, with the assumption that a significant portion of private jet traffic at PBIA would voluntarily relocate to North County Airport. See response to Comment 2-41.

Letter Codes

FP0040

2-43 **Comment**

There are no landing fees at North County, but there are such fees at PBIA. Effective November 1, 2008, the County imposed landing fees on private aircraft equal to the rate charged for commercial air carriers. These landing fees were imposed because commercial airliners argued that they were paying substantial landing fees, and private aircraft were not paying their fair share, since private aircraft account for about two-thirds of the operations at PBIA. Of course, none of these facts are disclosed in the FEIS.

Response

The comment is incorrect when it states that "none of these facts are disclosed in the FEIS." Landing fees, as a demand management measure are discussed and evaluated in Section 3.3.5 of the FEIS. The discussion notes that the Airport Sponsor implemented landing fees for GA aircraft at PBIA in November 2008. The purpose of the landing fee was to address cost equity issues between air carriers and GA users of the airport and notes that landing fee structure was not designed to be discriminatory or to shift activity from one airport to another.

Letter Codes

FP0040

2-44 Comment

For an expenditure of less than \$10 million, the North County airport could eliminate any possibility of congestion at the Airport and any supposed need to spend hundreds of millions of dollars to relieve that theoretical congestion. Yet the FEIS fails to analyze the benefits of North County expansion. This is inexplicable in light of the County's existing plan for expansion at North County. The County has clearly delayed development of North County because it would render the expansion plan at PBIa unnecessary.

Response

The Commenter provides no basis in their submittal for the \$10 million cost estimate to improve North County Airport to accommodate relocated GA jet activity from PBIa. Please see response to Comments 2-2, 2-10, 2-41, and 2-42.

Letter Codes

FP0040

2-45 Comment

FEIS's states that the main reason it did not conduct a detailed analysis of expanding North County is the location of the environmental preserve area, the CSX railroad, and State Road 710 surrounding the North County airfield. See FEIS at 3-28. However, the FEIS fails to mention that the County itself proposed a runway extension in its October 2006 Master Plan Update for North County, and the FEIS fails to explain how it reached a different conclusion.

Response

The FAA acknowledges that the County's Master Plan and ALP for the North County Airport includes a future extension of Runway 13 to provide a total runway length of 6,000 feet. However, coordination with the Airport Sponsor indicates that the County has no plans to extend the runway at this time, and the County has not requested the FAA's unconditional ALP approval of a runway extension project at the North County Airport. As discussed in the FEIS, there would be significant environmental issues associated with expanding the North County Airport. The FAA believes that, based on the Airport Sponsor's goal to attract and maintain high levels of aviation services to larger GA aircraft users at PBIa, there is no indication that the required improvements to airfield, support facility, or level of service is planned or that such actions will be undertaken at the North County Airport to shift a substantial portion of PBIa's general aviation activity away from PBIa. See response to Comment 2-41.

Letter Codes

FP0040

2-46 Comment

FEIS has made no attempt to comply with the requirements of the FAA and NEPA to conduct a cost-benefit analysis. The air traveling public will receive no benefit from the conditional approval of plan to address a problem that does not and may never exist.

Response

See response to Comment 2-16.

Letter Codes

FP0040

2-47 Comment

The FAA's June 2008 FEIS for the Ft. Lauderdale Airport runway expansion is illustrative of the type of rigorous cost-benefit analysis that should have been done in this case. The Ft. Lauderdale FEIS includes a detailed cost-benefit analysis of each of the proposed improvement plans. There is also a detailed breakout of all relevant incremental costs for items such as earthwork, structures, runways, taxiways (parallel and cross field), land acquisitions and facility relocation, and additional O&M costs. It quantifies in dollars (including delay benefits) the annual costs and benefits of each through the year 2030. The Ft. Lauderdale FEIS includes a tenant relocation cost analysis. The PBIa contains no such analysis.

Response

See response to Comments 2-15 and 2-16.

Letter Codes

FP0040

2-48 **Comment**

The FEIS states that the cost of the total expansion plan, both long-term and short-term, is \$370 million. That is the only cost number stated anywhere in the FEIS. The FEIS does not even state what portion of this cost is for the Short-Term Project, and what portion is for the Long-Term Project. The FEIS does not break out any of the other categories of costs in the manner that Ft. Lauderdale did. It is impossible to know whether the cost total is accurate or complete. Without cost breakdowns, a cost benefit analysis is impossible.

Response

Please see response to Comments 2-15 and 2-16.

Letter Codes

FP0040

2-49 **Comment**

The \$370 million is stated in 2008 dollars. There is no estimate of inflation through the year 2030, so that the actual cost of the Plan when it might be implemented cannot be determined.

Response

Please see response to Comment 2-16.

Letter Codes

FP0040

2-50 **Comment**

The FEIS also omits to state that there is an additional cost of at least \$100 million to rebuild the two FBOs at Golfview that will be relocated from the south side of the Airport. This rebuilding cost will have to be borne by the FBOs themselves under the terms of their existing leases with the Airport, which give the Airport the right to condemn their existing FBOs without any compensation from the County. Although the County will not bear this cost of more than \$100 million, it is obviously a part of the total cost of the Plan, a portion that will be borne by private business.

Response

The Commenter provides no basis for the \$100 million cost estimate to relocate and construct the two FBOs facilities. However, if this amount were added to the preliminary cost estimate for the AIP, it would not affect or change the FAA's selection of the Preferred Alternative.

The FAA acknowledges that some Airport Improvement Program eligible or ineligible costs may not have been fully accounted for due to the conceptual nature of the plan and that final financial and leasing agreements between the Airport Sponsor and certain airport tenants, which may affect the total cost of an alternative, were not determined when the FEIS was published. The FAA reviewed the comment regarding potential hangar construction costs and determined that, if the cost cited by the Commenter were added to the conceptual cost estimate for the AIP, it would have had no effect on the outcome of the alternatives analysis or selection of the Preferred Alternative. This is because accounting solely for construction costs; the preferred alternative remains the most favorable alternative. See response to Comment 2-15.

Letter Codes

FP0040

2-51 **Comment**

In vivid contrast, the Ft. Lauderdale FEIS considered the fact that the alternative for building a second new runway very close to the existing main runway would require the relocation of FBOs from one side of the field to another was considered to be a significant disadvantage to that alternative. Curiously, the FEIS for PBIA does not mention any disadvantage at all from this \$100 million relocation.

Response

It is difficult to draw any direct comparison between the evaluation of alternatives in the FEIS for the Ft. Lauderdale-Hollywood International Airport (FLL) and the evaluation of alternatives in the PBIA EIS. This is because operating conditions, constraints, costs, and other factors that determine whether or not an alternative is considered reasonable are often different among airports and were different between the two cited airports. Therefore, the attempt to classify the relocation of some general aviation facilities at PBIA as a “disadvantage” is not a fair representation or comparison. Also, please see response to Comment 2-50.

Letter Codes

FP0040

2-52 Comment

The FEIS also fails to consider distinctions between commercial aircraft operations and private aircraft operations in the FEIS. PBIA is unique in that it services a large number of private aircraft; however, the FEIS provides no distinction for these different types of aircraft operations and does not consider ways in which private aircraft operations might be accommodated at other regional airports at significantly lower costs and with potentially less environmental harm to historic resources.

Response

The FAA evaluates delay, congestion and the need for capacity improvements for all airport users, not just commercial carriers. At PBIA, and in the FEIS, the FAA recognizes that GA aircraft generate a majority of operations and experience a majority of the negative consequences of congestion. Section 3.0 of the FEIS evaluated several alternatives that that would potentially affect GA aircraft at PBIA, including the use of other area airports.

Letter Codes

FP0041

2-53 Comment

For these reasons [ed., see Comments 5-7 and 29-11], we disagree with the FAA's assumption that approving the AIP would have no adverse effect on Mar-a-Lago.

Response

The FAA evaluated potential impacts of the Near-Term AIP and Long-Term AIP (and its alternatives) on Mar-a-Lago and found that the proposed airport improvements would not have a significant impact on the property and its standing as a National Historic Landmark. For additional discussion, see response to Comments 3-9, 3-10, 3-11, 5-7, 13-6, and 13-7.

Letter Codes

FP0041

2-54 Comment

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.

Response

Although it is theoretically possible to partition the amount of delay between airspace and ground operations, the issue at PBIA, which was confirmed through early discussions with the ATCT, the Airport Sponsor and airport users, was largely the result of the physical configuration of the airport's runways. The FAA acknowledges and is aware that airspace congestion along the east coast contributes to delay at South Florida airports. Delay experienced by aircraft operating at PBIA is also the result of multiple factors, including “gate holds in hub airports,” as stated by the Commenter. The FAA reconfigured airspace in South Florida in 2005 to increase capacity and improve efficiency. Because aircraft operational delay at PBIA is predominantly caused by the airports runway configuration and the unique fleet mix of aircraft using the airport, the FAA did not deem it necessary to

quantitatively delineate how much of the delay at PBIA is caused by the physical configuration of the airfield versus airspace issues. The time and expense to provide this data would not have contributed in a meaningful way to the understanding of the delay that was experienced at PBIA.

Since the South Florida airspace reconfiguration has already been undertaken, the primary means of dealing with the delay that is caused by airspace issues is no longer available, so the next logical step is to turn attention to the potential ground based causes of delay. In other words, partitioning the delay by generic cause (airfield vs. airspace), as requested by the Commenter, would not yield information that would be meaningful in the FAA's decision-making because the airspace optimization, which is the primary means of correcting airspace related delay, has already been undertaken.

Letter Codes

FL0001

2-55 **Comment**

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, and there is very limited development in the vicinity of the airport and, as such, impacts on residential areas would be minimal.

Response

Development of the North County Airport as a supplement to PBIA was considered in Section 3.3.4 of the FEIS, along with nine other commercial and general aviation airports located in Palm Beach County, Broward County, Martin County, St. Lucie County, and Okeechobee County. The evaluation of these airports noted that existing runway lengths, aviation facilities, and aviation services would not accommodate the type of general aviation activity currently supported at PBIA without substantial new development.

See response to Comments 2-2, 2-10, 2-41, and 2-42 for discussions regarding the development and use of the North County Airport as a supplement to PBIA.

Letter Codes

FL0001

2-56 **Comment**

Expansion of the runway and other facilities at North County Airport would allow almost all General Aviation planes to use the North County Airport.

Response

See response to Comments 2-2, 2-10, 2-41, and 2-42 for discussions regarding the development and use of the North County Airport as a supplement to PBIA.

Letter Codes

FL0001

2-57 **Comment**

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.

Response

See response to Comments 2-2, 2-10, 2-41, and 2-42 for discussions regarding the development and use of the North County Airport as a supplement to PBIA. As indicated in the response to Comment 2-10, the Airport Sponsor has not informed the FAA that the County intends to seek to expand the North County Airport. Also, regarding the shifting of GA operations from PBIA to the North County Airport, it should be noted that the FAA does not have the authority to direct or place influence upon general aviation aircraft operators to shift their activity and services from one airport to another or to operate at specific times of the day. Although the Airport Sponsor may have the authority to designate specific airports within an airport system as commercial service only, in this instance, the other airports in the system do not provide adequate facilities for the types of large general aviation aircraft using PBIA. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the general aviation fleet that operates at PBIA or any other public use airport.

Letter Codes

FL0001

2-58 Comment

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.

Response

The Commenter provides no basis in their submittal for the general statement of cost to improve North County Airport to accommodate relocated GA jet activity from PBIA. The FAA understands that developing additional and/or expanded aviation facilities at the North County Airport may cost less than the Airport Sponsor's Long-Term AIP. However, the Airport Sponsor's stated goals are to serve commercial and large general aviation aircraft at PBIA. This is because many owner/operators of large GA aircraft would be expected to choose to operate at PBIA due to its proximity to the local centers of commerce and high-end housing. Similarly, the owners/operators would choose to operate at PBIA because of PBIA's GA support services that cater to large corporate and executive-class aircraft. Please see response to Comments 2-10 and 2-42.

Letter Codes

FL0001

2-59 Comment

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.

Response

Palm Beach County has prepared a Master Plan for the North County Airport that includes, among other analyses, an evaluation of the current and potential aviation demand at the airport and an evaluation of runway length needs at the airport. For additional discussion of the North County Airport and its Master Plan, please see response to Comments 2-10 and 2-41.

Letter Codes

FL0001

2-60 Comment

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.

Response

See response to Comments 2-2, 2-10, 2-41, 2-42, 2-43, 2-45, 2-55, 2-58, and 2-59 for discussions regarding the development and use of the North County Airport as a supplement to PBIA.

Letter Codes

FL0001

2-61 Comment

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.

Response

Comment noted. Based on PBIA aircraft activity records since late 2008 and the FAA's 2009 TAF, the agency has determined that the level of aircraft activity at PBIA does not currently result in unacceptable levels of operational delay. The FAA acknowledges that the current economic recession has reduced the level of aircraft activity at PBIA such that the number of aircraft operations at PBIA that previously justified the need for the airfield capacity enhancement components of the overall AIP are no

longer anticipated to occur within the time frame identified and evaluated in the September 2008 DEIS (Study Years 2013 and 2018). While the FAA's 2009, 2010, and 2011 Terminal Area Forecasts predict a modest but steady increase in aircraft activity, it is not yet clear precisely when PBI A can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay.

The Airport Sponsor acknowledges that the runway configuration capacity enhancements are not warranted at PBI A at this time; therefore, it has requested only the FAA's conditional ALP approval of the Long-Term AIP through the current EIS process. The FAA agrees that the Long-Term AIP is not ripe for decision at this time. Therefore, the FAA will not consider unconditional ALP approval of the Long-Term AIP at this time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI A, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Development of the North County Airport as a supplement to PBI A was considered in the FEIS, along with nine other commercial and general aviation airports located in Palm Beach County, Broward County, Martin County, St. Lucie County, and Okeechobee County. The evaluation of these airports noted that existing runway lengths, aviation facilities, and aviation services at these Airports would not accommodate the type of general aviation activity currently supported at PBI A without substantial new development.

Letter Codes

FL0002

2-62 **Comment**

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.

Response

The FAA notes the Town of Palm Beach comment regarding FAA's determination that the short-term project (Near-Term AIP), including the widening of a taxiway and buying property along Military Trail would have no impact.

Letter Codes

FL0002

2-63 **Comment**

I am writing to voice my concerns against this project and hoping in review this project is closed. If the concerns are for the private jets, it seems there are sufficient accommodations further South and North.

Response

Comment against proposed expansion at PBI A noted.

Development of an alternate airport as a supplement to PBI A was considered in the FEIS. The FEIS analysis considered commercial and general aviation airports located in Palm Beach County, Broward County, Martin County, St. Lucie County, and Okeechobee County (see Section 3.3.4 of the FEIS). This alternative, by intent, would reduce the overall forecast operational demand levels at PBI A, thus providing capacity and demand reductions at PBI A. However, the evaluation of these airports noted that existing runway lengths, aviation facilities, and aviation services would not accommodate the type of general aviation activity currently supported at PBI A without substantial new development.

Also, regarding the use of another airport, it should be noted that the FAA does not have the authority to direct or place influence upon general aviation aircraft operators to shift their activity and services

from one airport to another or to operate at specific times of the day. Although the Airport Sponsor may have the authority to designate specific airports within an airport system as commercial service only, in this instance, the other airports in the system do not provide adequate facilities for the types of large general aviation aircraft using PBIA. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the general aviation fleet that operates at PBIA or any other public use airport.

Letter Codes

FP0042

2-64 **Comment**

The EIS does not adequately address the effect of FAA programs to alter routing, frequency and other characteristics of flights in and around PBIA, either as implemented since the EIS process commenced, or as is presently planned but not implemented, or as may be implemented in the future.

Response

There are a number of FAA technological solutions and programs that might be applied at PBIA as demand management strategies, which are briefly described below and later assessed for their respective applicability.

Terminal Air Traffic Control Automation -- The FAA continues to develop their work on the multi-element Terminal Air Traffic Control Automation (TATCA) program, which provides computer automation to assist controllers in traffic flow management in the airspace surrounding major airports. This automation technology offers direct benefits to air transportation through improved airspace capacity, reduced operations delays, fuel savings, and enhanced controller productivity.

PRM/SOIA -- Simultaneous Offset Instrument Approach (SOIA) is an approach system provides Air Traffic Controllers the capability to allow simultaneous staggered Instrument Landing System (ILS) approaches to airports having parallel runways using separate Offset ILS and regular (straight-in) ILS approaches. Precision Runway Monitor (PRM) is a system of high-resolution (i.e., high update rate) radar that allow air traffic controllers to monitor the arrival streams of landing aircraft on parallel runways having centerlines separated by less than 4,300 feet.

The FAA's development and use of the PRM and SOIA procedures represents a marriage of existing ILS approach procedures and enhanced radar technologies that when used together, provide enhance aircraft arrival capacity at airports having "closely-spaced" parallel runways (i.e., centerline separations greater than 750 feet, but less than 2,500 feet). Without the combined and concurrent use of these two technologies, Air Traffic Controllers must accommodate a single arrival stream of approaching aircraft to the two closely-spaced runways.

This technology has been successfully implemented at the San Francisco International Airport, where, during optimal weather conditions, the Airport may accept increased levels of arrivals on its closely-spaced parallel runways having a centerline separation of only 750 feet. This technology, however, is not applicable during low cloud ceilings and/or reduced visibility conditions.

Standard Terminal Automation Replacement System -- The FAA's Standard Terminal Automation Replacement System (STARS) replaces outdated equipment in terminal radar approach control (TRACON) and tower facilities and provides controllers with new capabilities that allow technical operations personnel to monitor and review system resources, critical operational information about aircraft positions, flight data, and weather. Controller display enhancements include a high-resolution color monitor with alert algorithms, similar to that provided by PRM, but without high update rate.

TACAS -- The Traffic Alert and Collision Avoidance System, or the Traffic Collision Avoidance System (TCAS) represents technology that reduces the potential for mid-air collisions between aircraft. The on-board automated system monitors the airspace around an aircraft for other aircraft equipped with a corresponding active transponder, independent of air traffic control, and warns pilots of the presence of other transponder-equipped aircraft which may present a threat of mid-air collision. Through continuous back-and-forth communication between nearby independent TCAS systems, a three-

dimensional map of each aircraft is developed that allows the TCAS to report a nearby aircraft's relative bearing, altitude, and range. Then, by extrapolating the current range and altitude difference, the TCAS determines if a potential collision threat exists.

LDA -- Localizer Type Directional Aid Approaches offer lateral air navigational offset lateral approach path guidance to designated runways. LDA approaches are of comparable to the use and accuracy of standard localizer approach procedures, but are not part of a complete ILS. An LDA approach procedure may utilize other complimenting technologies such as marker beacons and a glide slope, just as other precision approaches, but requires that the offset alignment to the extended runway centerline be no greater than 30 degrees.

GPS -- The Global Positioning System (GPS) is a space-based global navigation satellite system that provides reliable location and time information in all weather and at all times and anywhere on or near the Earth when and where there is an unobstructed line of sight to four or more GPS satellites. It is maintained by the United States government and is freely accessible by anyone with a GPS receiver.

RPN -- Required navigation performance (RNP) involves procedures that rely on onboard avionics to keep an aircraft within a tightly specified airspace corridor. The use of RPN technologies and procedures were developed to replace or supplement traditional point-to-point, leg-based ADF/VOR/DME/ILS methods of zigzag or straight-in navigation, thus offering a smoother direct flow model using GNSS (global navigation satellite system) as the primary navigation data source. In essence, RNP attempts to make the cleanest straight line or constant radius turn aircraft navigational routing while allowing obstacle flexibility to the user where required.

Flight Management System -- Flight Management System (FMS) is a fundamental part of a modern aircraft's avionics that typically utilizes a specialized computer system that automates a wide variety of in-flight tasks, reducing the workload on the flight crew to the point that modern aircraft no longer carry flight engineers or navigators. A primary function is in-flight management of the flight plan. Using various sensors (such as GPS and INS) to determine the aircraft's position, the FMS can guide the aircraft's autopilot along the flight plan. From the cockpit, the FMS is normally controlled through a Control Display Unit which incorporates a small screen and keyboard. The FMS sends the flight plan for display on the EFIS, Navigation Display or Multi-function Display. These in-cockpit technologies represent on-going and evolutionary development of tools that offer to reduce workload and improve piloting and air navigation efficiency.

Applicability to Airfield Capacity Enhancement at PBIA

The application and use of each of these described technologies or initiatives have provided enhanced abilities to pilots, air traffic controllers, and the entire aviation community as a whole. When applied individually, or in concert, these technologies have been proven to reduce arrival delays at the nation's major airports and enhance air traffic control's handling of aircraft movements.

The proposed development of a closely-spaced parallel runway system at PBIA is predicated upon the need for enhanced airfield capacity and increased aircraft handling flexibility by PBIA ATCT personnel during peak periods of demand. The proposed increase in airfield capacity and added flexibility will be available through the ATCT's coordinated control of staggered arrivals and departures using single independent arrival and departure streams to two separate, but closely-space parallel runways.

PBIA is identified within the FAA's National Plan of Integrated Airport Systems (NPIAS) as a Medium Hub Primary Commercial Airport. Within the national Hub and Spoke system of airports, PBIA serves as an Origination and Destination (O&D) airport. Because of the operational nature and aeronautical role of PBIA as an O&D airport, the need for simultaneous arrivals to the two closely-spaced runways is not anticipated or desired at this time.

The use of the previously described aviation-specific technologies or initiatives do not meet the purpose and need to improve capacity and reduce delay at PBIA during peak period of demand for the

following reasons:

1. While the technologies associated with TACA, STARS, and TACAS provide many benefits to Air Traffic Control system as a whole, these technologies do not directly provide the needed flexibility and increased airfield capacity offered by the proposed use of dedicated single arrival and departure streams to two separate, but closely-space parallel runways at PBIA.

2. Although more readily applicable to PBIA's proposed closely-spaced parallel runway scenario, potential use of PRM/SOI and/or LDA Approach Procedures may potentially allow dual arrival streams to the two runways. In light of the fact that operational delays at PBIA during peak periods requires the efficient handling of both arrival and departures, these technologies would not fully provide the benefits of flexibility and increased airfield capacity offered by the dedicated use of a single arrival and departure runway operational scenario.

The proposed PBIA airfield improvements were never envisioned to provide dual dependent simultaneous (staggered) approach capabilities at PBIA during peak demand periods. The closely-spaced runways, however, would offer benefits of flexibility and increased airfield capacity using dedicated single arrival and departure streams.

3. GPS technologies are currently available and are in use by equipped and qualified pilots that utilizing any one of four published RNAV Instrument Approach Procedures published by the FAA for PBIA. These approach procedures provide lateral and vertical navigational course guidance to the approach ends of Runways 10L, 14, 28R, and 32. The use of GPS and the associated Published Instrument Approach Procedures provide increased utilization of PBIA during certain Instrument Meteorological Conditions.

4. Required navigation performance (RNP) procedures are currently available and are in use by equipped and qualified pilots that utilizing any one of four published RNAV Instrument Approach Procedures published by the FAA for PBIA.

These approach procedures provide lateral and vertical navigational course guidance to the approach ends of Runways 10L, 14, 28R, and 32 and offer lateral course guidance to accuracies of 0.11 nautical miles. The use of RNP Published Instrument Approach Procedures provide increased utilization of PBIA during certain Instrument Meteorological Conditions.

It should be noted that RNP Parallel Approach with Transition (RPAT) procedures have been developed at other airports that utilize RNP to improve arrival capacity of parallel runways with centerline separations between 750 and 4,299 feet. The application and use of RPAT procedures offer Air Traffic Controllers greater capabilities in handling dual arrival streams to busy airports. Similar to PRM/SOI and LDA applications, RPAT could potentially offer enhanced airspace and airport airfield capacity through the use of a dual arriving aircraft streams to the two closely-space parallel runways.

The proposed AIP, however, using closely-space runways having 800-foot runway centerline separation was never envisioned to accommodate dual dependent parallel simultaneous approaches to improve airfield capacity at PBIA.

5. Aircraft utilized by air carriers and cabin-class general aviation aircraft that currently operate to and from PBIA typically utilize Flight Management System (FMS) technologies. The use of FMS technologies by pilots operating at PBIA, which help manage in-cockpit workloads, is not considered to have a substantive effect on, or enhance airfield capacity at PBIA. Therefore, this technology would not reduce aircraft operational delay at PBIA.

6. These aviation-specific technologies, measures, or initiatives, when applied collectively or individually, would not fully serve to optimize the PBIA ATCT's handling of arrival and departure operations as proposed through the proposed use of dedicated single arrival and departure streams to two separate, but closely-space parallel runways.

Letter Codes
FP0044

Palm Beach International Airport FEIS

3. Noise

3-1 **Comment**

This message is to express my dismay and deep concern over the findings in the PBIA EIS. In particular, I find it unconscionable and illogical to reach a conclusion that a new south parallel runway with a new arrival and departure corridor over the Historic Vedado/Hillcrest neighborhood will have no significant noise impact and no increase in atmospheric/sooting impacts. I summarily reject the findings that the noise will not increase as a self-serving conclusion that fails to take into account the fact that homes on the north side of Paseo Morella, south of and not directly under the flightpath, have already been found to require noise mitigation measures.

Response

In the September 2008 DEIS, the FAA evaluated potential noise impacts associated with the No-Action Alternative, the AIP, and Alternative 2 for future Study Years 2013 and 2018. The results of that analysis indicated that for both study years, the AIP and Alternative 2 would result in significant noise impacts west of PBIA that would require mitigation measures. The significant noise impacts west of PBIA would be primarily due to the type of operation for which each of the parallel runways would be used. The existing Runway 10L/28R would be used primarily for departure operations and the expanded Runway 10R/28L would accommodate arrival operations. For more detail on aircraft noise analysis and impacts as depicted in the DEIS, see Section 5.12 and Appendix D of the DEIS. For details on planned runway use, see Section 3.3.7-1 of the DEIS.

For the FEIS, the FAA conducted a quantitative analysis of the Near-Term AIP, which does not include the runway expansion. Because of uncertainty as to the timing for the Long-Term AIP, which does include the runway expansion, the FAA retained the noise analysis presented in the DEIS as being reasonably representative of the potential noise impacts associated with the No-Action Alternative, and the Long-Term components of the AIP and Alternative 2 that would be experienced when the number of aircraft operations at PBIA return to the levels that would cause unacceptable aircraft operational delay. The FAA determined that the Near-Term AIP would not result in significant noise impacts. However, the Long-Term AIP has the potential to result in significant noise impacts (see Section 5.12 of the FEIS). As a result of the delayed need for and construction of the Runway 10R/28L expansion project, the FAA has provided an accounting of potential future noise impacts associated with the Long-Term AIP or Long-Term Alternative 2 based on the best information available at this time. However, the FAA acknowledges that these conditions may change over time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0003

3-2 **Comment**

At the church, we have been bothered in the past with the noise of planes taking-off and certainly do not want an expansion that might bring more flights over our church. And for the neighborhood from which many of our parishioners have come, it does not need additional activity bringing more noise or other environmental disturbances.

Response

The Near-Term components of both the AIP and Alternative 2, which include several independent utility projects that may be implemented by the Airport Sponsor by 2015, would not result in significant noise impacts, from either construction activities or aircraft operations.

The FEIS considered noise-sensitive sites (e.g., churches, HUD housing complex, etc.) and conducted grid-point analyses on each site within the EIS study area. See Section 4.9.2, Section 5.12, and Appendix D-5 of the FEIS for details pertaining to these analyses. Further, FAA conducted supplemental noise analyses to describe the potential effect of aircraft noise on potential for speech interference, sleep disturbance and children's learning in school. See Appendix D-10 of the FEIS for further details.

Letter Codes

FP0010

3-3 **Comment**

Continuing problems such as noise pollution, damages to homes due to flight patterns would only increase if enlargement of the airport occurs.

Response

The Near-Term components of both the AIP and Alternative 2, which include several independent utility projects that may be implemented by the Airport Sponsor by 2015, would not result in significant noise impacts, from either construction activities or aircraft operations. Also, please see response to Comment 3-1.

Letter Codes

FP0014

3-4 **Comment**

Over the years the noise has increased and more often than ever planes fly almost right over my house, actually scarring me and making me wonder when a bad event will occur.

Response

FAA recognizes that there are existing aircraft overflights and noise levels in the vicinity of PBIA that create incompatible land uses and that 1,245 people live within DNL +65 dBA noise contour area. For the FEIS, the FAA documented baseline year (2008) noise levels to provide information of the existing noise environment in the vicinity of PBIA, compatible land use, and the number of housing units and people exposed to incompatible levels of aircraft noise. For more detail, see Section 4.9, Section 5.12, and Appendix D in the FEIS.

FAA regulations published in 14 CFR Parts 61 to 137 include numerous requirements to insure the safety of aviation operations. These regulations apply to PBIA. In addition, individual airlines establish their own specific operations criteria to ensure safety in air commerce including such things as weather minima, crosswinds, potential windshear, crew training requirements, and airports to use as alternates in case flights cannot be completed as planned.

Letter Codes

FP0017

3-5 **Comment**

I have lived here in W. P. B. for about 5 years. The noise pollution has increased significantly. The planes fly so low over my home that you can see the different things on the bottom of the plane. All Conversation comes to a stop, and the windows of the house rattle [sic]!

Response

See response to Comment 3-4.

Letter Codes

FP0036

3-6 **Comment**

Sometimes the planes come every two or three minutes for a half hour at a time usually at lunch time and at dinner time so that it is hard to entertain. I cannot leave my doors open to the outside because you cannot hear yourself think and the planes wake you at night if the windows are left open.

Response

See response to Comment 3-4.

Letter Codes

FP0036

3-7 Comment

One of the statutory missions of the FAA is to minimize current and projected noise impacts of airports from nearby communities. 49 U.S.C. §47101. Yet, the FEIS gives only a cursory analysis of both the current noise impacts and the projected future noise impacts on the surrounding communities and unique landmarked properties, like Mar-a-Lago.

Response

The FAA conducted a detailed analysis of aircraft noise impacts, including detailed analysis of supplemental noise metrics, grid space analysis, and unique operational scenarios, that far exceed the noise analysis that are typically conducted as part of an EIS. The FAA did not identify any significant noise impacts to Mar-a-Lago that would occur if the Near-Term AIP or Long-Term AIP were implemented by the Airport Sponsor. See Sections 4.9 and 5.12 of the FEIS for a detailed discussion of existing aircraft noise exposure and potential future impacts that would occur if the Long-Term AIP was implemented. Also, see response to Comment 3-1.

Letter Codes

FP0040

3-8 Comment

The noise contours used in the FEIS are based on "long-term study" years 1, 2, and 3. See, e.g., FEIS Figure 5.12.1-4. These years are totally hypothetical years. They represent years in which the FEIS projects the Airport will reach certain operational levels. As shown above, there is no way to determine when these years will actually occur. It is impossible to do a valid noise study for a year whose actual date cannot be presently determined.

Response

The INM, which is used to model aircraft noise, does not use a specific "year" as input data. The INM utilizes data, such as aircraft type, number of operations, fleet mix, time of day, etc. as the critical input information. Therefore, it does not matter what specific year is modeled as long as the other input data is accurate. As discussed in Section 5.1 of the FEIS, the Airport Sponsor determined and the FAA agreed that the Long-Term AIP or Long-Term Alternative 2 will not be needed by 2013, the original implementation year that was evaluated in the September 2008 DEIS. Because the FAA cannot accurately predict when aircraft operational delay at PBI may again reach unacceptable levels, the FAA similarly cannot definitively identify in the FEIS when impacts associated with the Long-Term AIP and Long-Term Alternative 2 would occur. With regard to the timing of the Long-Term AIP or Long-Term Alternative 2, the FAA acknowledges that environmental, social, and regulatory conditions may change over time and potential environmental impacts and mitigation measures may differ, depending on the actual implementation year of the Long-Term components of the AIP or Alternative 2.

In the FEIS, the quantitative analyses previously conducted by the FAA for the overall AIP and Alternative 2 projects, which were included in the September 2008 DEIS, were determined by the FAA to be reasonably representative of the potential impacts that would occur if the AIP or Alternative 2 were constructed in their entirety in Long-Term Study Year 1 (LTSY 1) and they continued to operate in Long-Term Study Year 2 (LTSY 2). As such, the analyses presented in the September 2008 DEIS (with minor updates and revisions) were used in the FEIS to disclose potential impacts associated with the Long-Term AIP and Long-Term Alternative 2. For the FEIS, the potential environmental impacts previously identified and analyzed in the DEIS for the AIP and Alternative 2 at operational levels of approximately 221,693 (previously forecast to occur in 2013) are now representative of LTSY 1. Likewise, the potential environmental impacts previously identified in the DEIS for the AIP and Alternative 2 at operational levels of approximately 238,457 (previously forecast to occur in 2018) are now representative of LTSY 2.

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation,

environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0040

3-9 **Comment**

The FEIS fails to address or account for the seasonality of PBI A and the noise impacts which result from increases in private jet traffic during certain segments of the year.

Response

Because PBI A does have seasonal fluctuations in activity, and the fact that this was an issue of concern raised by the public, the FAA conducted extensive noise analyses for the Peak Month Average Day and Average Busy Day. These analyses, provided for disclosure purposes, are contained in Appendix D of the FEIS. The noise impact analyses presented in the main body of the FEIS, and used to determine whether significant impacts would occur, were modeled using the Integrated Noise Model (INM) based on Average Annual Day aircraft operations (see FEIS, Sections 4.9 and 5.12). This is consistent with FAA guidance and is an accepted method by Federal agencies and other airport noise organizations to determine potential aircraft-related noise impacts to non-compatible land uses.

Letter Codes

FP0040

3-10 **Comment**

The FAA's utilization of Day-Night Average Sound Levels (DNL) as the measure of noise levels created by the Airport is improper. Due to the seasonality of flights at the Airport, DNL should not be used to provide an annual average of noise levels. With large numbers of private jet flights arriving and departing the Airport in the winter months, and with far fewer such flights in the summer months, the unacceptable noise impacts in the winter months are concealed by averaging them with the less intense impacts in the summer. It is a fundamental principle of statistics that averaging data which contains wide fluctuations does not lead to a meaningful statistical result. The FEIS does not address any of these impacts.

Response

In accordance with FAA guidelines, FAA policy and industry-accepted methods for describing and evaluating noise impacts, the FAA analyzed aircraft-related noise exposure in the vicinity of PBI A using Day-Night Average Sound Level (DNL). However, to address local noise concerns about the seasonality of activity at PBI A, the FAA generated noise exposure contours for Peak Month Average Day, and Average Busy Day. These supplemental analyses, provided for disclosure purposes, are contained in Appendix D of the FEIS.

Letter Codes

FP0040

3-11 **Comment**

The DNL methodology also ignores single-event impacts. Using a model which takes an average measurement of noise levels within a 24 hour period does not properly analyze the effects of single event noise impacts. For example, if there are 100 Piper Cubs which fly over a given point during the day, and several 747s, DNL may show that the "average" level of noise is acceptable.

Response

Please see response to Comment 3-10. In addition, the FAA conducted a detailed analysis of aircraft noise impacts, including detailed analysis of supplemental noise metrics associated with single-event noise impacts, grid space analysis, and unique operational scenarios, that far exceed the noise analysis that are typically conducted as part of an EIS. The analysis of supplemental metrics, presented in Appendix D of the FEIS for disclosure purposes, included the potential effect of aircraft noise associated with the Long-Term AIP on Speech Interference, Sleep Disturbance, and Children's Learning in Schools.

Letter Codes

FP0040

3-12 Comment

In addition to the erroneous usage of DNL to measure greatly fluctuating annual noise impacts at the Airport, the use of DNL to measure average daily noise impacts is likewise flawed. The Airport is one of the very few airports its size that imposes a curfew on nighttime air traffic from the hours of 10:00 p.m. to 6:00 a.m. the curfew (a concession that noise impacts do affect the surrounding communities). Given this eight hour period of non-usage, DNL produces a significant inaccurate measure of actual noise impacts. Averaging 8 hours of virtually zero noise with 18 hours of substantial noise produces a misleading measure of the noise during the 8 non-curfew hours. Combining the inaccurate seasonable averages with misleading daily averages compounds the inaccuracy of the "average annual" DNL levels used in the FEIS.

Response

The FAA disagrees with the Commenter's statement that the use of DNL to measure "greatly fluctuating" noise at PBIA is flawed because most aircraft fly during the day and not at night and that the Airport Sponsor imposes a curfew at night. The use of the Integrated Noise Model to evaluate noise exposure impacts (DNL) at an airport is consistent with FAA guidance and is an accepted method by Federal agencies and other airport noise organizations. However, to provide information on potential nighttime noise impacts, the FEIS included the analysis of supplemental metrics that evaluated the potential effect of aircraft noise associated with the Long-Term AIP on nighttime Sleep Disturbance (see Appendix D of the FEIS).

Letter Codes

FP0040

3-13 Comment

The FEIS also fails to address potential changes in fleet mix over the next several decades, and the resulting increased impact from increased use by larger and noisier aircraft including Group IV aircraft for which Taxiway L is to be widened.

Response

The analysis of future noise impacts associated with the Long-Term AIP took into account potential changes in fleet mix based on the forecast prepared by the Airport Sponsor (which was approved for use by the FAA). FAA notes that the requested widening of Taxiway "L" would provide a benefit for current airport users, which includes ADG IV aircraft use of Runway 10L/28R and occasionally use the FBO facilities on the south side of the airport.

Letter Codes

FP0040

3-14 Comment

The FEIS does not take into account the significant increase in jet air traffic to the east of the Airport that will be caused by eliminating the use of the Diagonal Runway by jet aircraft.

Response

The analysis of future noise impacts associated with the Long-Term AIP took into account the proposed configuration of PBIA's airfield (including the shortened Runway 14/32) and operational changes expected to occur if the project was implemented (i.e., changes in runway use patterns). The assumptions and inputs for the future condition noise analyses are provided in Section 5.12 and in Appendix D of the FEIS.

Letter Codes

FP0040

3-15 Comment

The difference between DNL levels increase logarithmically; a 6 to 10 decibel increase in noise is perceived as doubling of the noise level. One or two differences in DNL are therefore substantial.

Response

The FAA disagrees with the Commenter's statement that "a 6 to 10 decibel increase in noise is perceived as doubling of the noise level." An approximate 3 decibel increase is typically associated with

a doubling of noise. The FEIS used the requirements and guidance set forth in FAA Order 1050.1E for the evaluation of aviation noise. To evaluate noise impacts, Section 14.3 of the Order states that a proposed action would have a significant impact with regard to aviation noise, when compared to the No-Action Alternative for the same time frame, if it would cause noise-sensitive areas exposed to DNL 65 dBA or higher to experience a noise increase of at least DNL 1.5 dBA and cause an increase of DNL 1.5 dBA that introduces new noise-sensitive areas to exposure levels of DNL 65 dBA or more.

To comply with the FAA's guidance provided in paragraph 14.4c of Appendix A to the Order, noise-sensitive areas exposed to levels between DNL 60 dBA and 65 dBA should be evaluated for increases of DNL 3.0 dBA or greater if an increase of DNL 1.5 dBA occurs at any noise-sensitive area within the DNL 65 dBA or higher contour.

Letter Codes

FP0040

3-16 **Comment**

The FEIS fails to consider the true nature of air traffic at PBIA, and improperly conceals the magnitude of adverse noise impacts by the use of averaging.

Because of PBIA's unusually high degree of variation in seasonal air traffic, the FAA should not use data that conceals the magnitude of air traffic noise through year round averaging of sound levels. Instead, the FEIS should disclose and analyze how existing single-event noise impacts affect historic resources in and around the PBIA.

Response

The FAA conducted a detailed analysis of aircraft noise impacts, including detailed analysis of supplemental noise metrics, grid space analysis, and unique operational scenarios, that far exceed the noise analysis that are typically conducted as part of an EIS. For a discussion of the seasonality of traffic at PBIA, the FAA's use of DNL as a noise exposure metric, and the evaluation of supplemental noise metrics in the FEIS see response to Comments 3-9, 3-10, and 3-11.

Letter Codes

FP0041

3-17 **Comment**

Particular focus should be given to the winter months, when aircraft operations are much greater than during other times of the year. Artificially diluting these impacts through averages does nothing more than conceal the AIP's impact from the public and creates the false impression that any adverse effects to historic resources will be minimal. The use of noise contours, which are based on an average sounds levels, does not take into account the potential adverse effects of existing and future single event noise impacts on historic resources.

Response

The FAA conducted a detailed analysis of aircraft noise impacts, including detailed analysis of supplemental noise metrics, grid space analysis, and unique operational scenarios, that far exceed the noise analysis that are typically conducted as part of an EIS. For a discussion of the seasonality of traffic at PBIA, the FAA's use of DNL as a noise exposure metric, and the evaluation of supplemental noise metrics in the FEIS see responses to Comments 3-9, 3-10, and 3-11.

Letter Codes

FP0041

3-18 **Comment**

By avoiding any consideration of the effect of single-event noise impacts, the FAA denies the public an opportunity to understand how existing or future PBIA aircraft operations may impact historic resources.

Response

The FAA conducted a detailed analysis of aircraft noise impacts, including detailed analysis of supplemental noise metrics, grid space analysis, and unique operational scenarios, that far exceed the noise analysis that are typically conducted as part of an EIS. See response to Comment 3-11.

Letter Codes

FP0041

3-19 **Comment**

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.

Response

The noise and air quality analyses contained in the PBIA FEIS were prepared in accordance with FAA Orders 5050.4B, 1050.1E, and other applicable guidance. The Integrated Noise Model used in the FEIS is the current accepted model for FAA airport noise studies. The noise contours were developed using actual flight tracks and profiles obtained from a full year of PBIA radar data and discussions with the PBIA air traffic control personnel. The aircraft operations, fleet mix, and time of day information for the 2008 baseline case was also derived from PBIA radar data and the airport's noise monitoring system data. The noise analysis and contour development meets all current FAA environmental guidelines.

Similarly, air quality impacts were evaluated using the procedures and modeling software (EDMS) developed by the FAA and accepted by Federal agencies for use in determining potential air quality impacts (see Section 5.2 and Appendix E of the FEIS for further information).

Letter Codes

FL0001

3-20 **Comment**

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.

Response

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 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 Integrated Noise Model. Also, see response to Comment 3-19.

Letter Codes

FL0001

3-21 **Comment**

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 [ed., the discretion the commenter refers to is the FAA guidance found in Order 1050.1E, that allows the inclusion of noise monitoring data in the EIS at the discretion of the responsible FAA official].

Response

The FAA declines the City of West Palm Beach's request to include noise monitoring data in the PBIA EIS. FAA guidance (Order 1050.1E) states that noise monitoring is not required and should not be used to calibrate the noise model.

The noise model used in the FEIS (i.e., INM) is the current accepted model for FAA airport noise studies. The noise contours were developed using actual flight tracks and profiles obtained from a full year of PBIA radar data and discussions with the PBIA air traffic control personnel. The aircraft operations, fleet mix, and time of day information for the 2008 baseline case was also derived from PBIA radar data and the airports noise monitoring system data. Future noise contours used much of the same information. The noise analysis and contour development meets all current FAA environmental guidelines.

Letter Codes

FL0001

3-22

Comment

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.

Response

The Near-Term AIP and Near-Term Alternative 2 will not result in significant noise impacts (see Section 5.12.3 of the FEIS). As discussed in Section 5.12.4 of the FEIS, the estimated population exposure to noise increases of DNL 1.5 or greater above 65 DNL during Long-Term Study Year 1 would be 957 persons and 831 persons for the Long-Term AIP and Long-Term Alternative 2, respectively. During Long-Term Study Year 2, population exposure to noise increases of DNL 1.5 or greater above 65 DNL would be 1,049 and 942 people for the Long-Term AIP and Long-Term Alternative 2, respectively. Because there would be DNL 1.5 change over noise-sensitive land uses above DNL 65, the FAA also conducted an analysis of the modeled changes in noise exposure within the DNL 60 to 65 range. This analysis concluded that there would be no DNL 3.0 or greater change in noise exposure over noise-sensitive land uses between DNL 60 and 65 if either the Long-Term AIP or Long-Term Alternative 2 were implemented.

With regard to the timing of airfield capacity enhancements at PBI, the FAA acknowledges that environmental, social, and regulatory conditions may change over time and potential environmental impacts and mitigation measures may differ, depending on when the improvements are ripe for decision. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FF0002

3-23

Comment

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.

Response

The Near-Term components of both the AIP and Alternative 2, which include several independent utility projects that may be implemented by the Airport Sponsor by 2015, would not result in significant environmental impacts, from either construction or operation, which would warrant the development and implementation of mitigation measures. The only airport improvements approved unconditionally on the ALP through this ROD is the Near-Term AIP.

In the September 2008 DEIS, the FAA evaluated potential noise impacts associated with the No-Action Alternative, the overall AIP, and Alternative 2 for future Study Years 2013 and 2018. The results of that analysis indicated that for both study years, the overall AIP and Alternative 2 would result in significant noise impacts to non-compatible land uses located west of PBI that would require mitigation

measures. The significant noise impacts west of PBI A would be primarily due to the type of operation for which each of the parallel runways would be used. The existing Runway 10L/28R would be used primarily for departure operations and the proposed expanded Runway 10R/28L would accommodate arrival operations. For more detail on aircraft noise analysis and impacts as depicted in the DEIS, see Section 5.12 and Appendix D of the DEIS. For details on planned runway use, see Section 3.3.7-1 of the DEIS.

For the FEIS, the FAA conducted a quantitative analysis of the Near-Term AIP, which does not include the Runway 10R/28L expansion. Because of uncertainty as to when runway improvements may become ripe for decision, the FAA retained the noise analysis presented in the DEIS as being reasonably representative of the potential noise impacts associated with the No-Action Alternative and the Long-Term components of the AIP and Alternative 2 that would be experienced when the number of aircraft operations at PBI A return to the levels that would cause unacceptable levels of aircraft operational delay.

Mitigation measures that could apply to both the Long-Term AIP and Long-Term Alternative 2 are discussed in Section 6.2 of the FEIS. Additionally, Section 6.3 of the FEIS describes a potential mitigation program for the FAA's Preferred Alternative, the overall AIP. It should be noted, however, that as a result of the delayed need for and construction of the Long-Term AIP, the FAA has provided an accounting of potential future environmental impacts associated with the Long-Term components of the AIP and Alternative 2 based on the best information currently available. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI A, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD. If this future NEPA evaluation identifies significant impacts – whether the same as those identified in the 2011 FEIS or different due to changes in time, technology, or other factors – mitigation measures for the FAA's Selected Alternative will be a requirement and condition of approval of a ROD, and would be committed to and implemented by the Airport Sponsor. The mitigation program will comply with the laws, regulations, and policies in force at that time and would consider the public and agency comments obtained by the FAA through this EIS process as well as any future NEPA process that would be undertaken.

Letter Codes

FF0002

3-24 **Comment**

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.

Response

The FAA is not considering unconditional ALP approval of the Long-Term AIP at this time. Rather, the FAA is providing, as requested by the Airport Sponsor, only conditional ALP approval for the Long-Term AIP. The FAA does not issue conditional approvals of ALPs with required mitigation, because conditional ALP approvals do not authorize the Airport Sponsor to undertake construction until further unconditional ALP approval is granted. Therefore, the FAA will not, at this time, be requiring mitigation commitments of the Airport Sponsor in this ROD for noise impacts associated only with the Long-Term AIP.

Letter Codes

FF0002

3-25

Comment

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.

Response

Please see response to Comment 3-24.

Letter Codes

FF0002

3-26

Comment

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.

Response

Please see response to Comments 3-2 and 3-24.

Letter Codes

FF0002

3-27

Comment

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.

Response

The Near-Term components of both the AIP and Alternative 2, which include several independent utility projects that may be implemented by the Airport Sponsor by 2015, would not result in significant noise, air quality or cumulative impacts, from either construction activities or aircraft operations. In this ROD, the FAA is granting unconditional ALP approval of only the Near-Term AIP.

As a result of the new 2009 TAF for PBIA, the Airport Sponsor deemed it necessary to re-evaluate the implementation schedule of the overall AIP at PBIA. 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.

The proposed Runway 10R/28L expansion and its associated connected actions are included and evaluated in the FEIS and are referred to as the "Long-Term AIP." Through this EIS process, the Airport Sponsor is requesting only conditional ALP approval of the Long-Term AIP. The FAA has conducted a qualitative evaluation of the noise exposure and air emissions associated with the Long-Term AIP based on the best available information at the time the FEIS was prepared. FAA acknowledges that by the time capacity enhancements are again warranted at the Airport there may be changes in operational conditions, such as aircraft fleet mix and aircraft emissions factors, which may show slightly different results than are disclosed in the FEIS. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose

and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FF0002

3-28

Comment

Regarding noise mitigation, EPA believes that the proposed FAA position for this project has merit but should be expanded.

Response

See response to Comments 3-23 and 3-24.

Letter Codes

FF0002

Palm Beach International Airport FEIS

4. Land Use

4-1 **Comment**

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).

Response

The Near-Term AIP, which is being granted unconditional ALP approval in this ROD, would not alter the configurations of the runways at PBIA or affect airspace over roads and right-of-ways. The Long-Term AIP is being considered at this time only for conditional approval on the ALP. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD. If after such review the FAA grants unconditional ALP approval of the Long-Term AIP or other airfield capacity enhancements, all necessary agency coordination will be conducted and required permits and certifications will be obtained by the Palm Beach County Department of Airports. This process will include coordination of airspace and approaches over adjacent roads with FDOT District Four.

Letter Codes

FS0001

Palm Beach International Airport FEIS

5. Air Quality

5-1 **Comment**

I am spending more and more time cleaning the greasy dirt out of my pool which is almost no pleasure to make use of anymore, and washing the greasy black dirty stuff off my pavers around my pool and sidewalks. It was not like this when I moved in.

Response

An Atmospheric (Soot) Deposition Study was conducted as part of the EIS process. Section 5.2.8 and Appendix E-2 of the FEIS provide specific information as to how the Soot Deposition Study was conducted and documents the results of the Study. As discussed in Section 5.2 of the FEIS, the atmospheric deposition samples collected at the community sites surrounding PBI did not indicate any measurable increase in soot deposition resulting from airport sources of air emissions. Please see response to Comment 5-5.

Letter Codes

FP0017

5-2 **Comment**

The EIS did not obtain soil samples from the two public schools directly in the flight path, instead collecting at a park near a water source (possible contamination), and on the island of Palm Beach.

Response

The air deposition study and other environmental analyses conducted for the EIS did not include the collection soil samples. See response to Comment 5-5 for a discussion of the sites selected for the soot deposition study.

Letter Codes

FP0032

5-3 **Comment**

The outdoor furniture is covered with black grit and suet, everyday. You cannot leisurely go out on your terrace and sit down because your clothes would become dirty and it would grind into the fabric on the chairs. So you have to sweep everything off and use Windex on the tables each time you want to use your outdoor areas.

Response

Please see response to Comment 5-1.

Letter Codes

FP0036

5-4 **Comment**

In its comments on the DEIS, Mar-a-Lago referred to a study that it performed in 1995, that showed the existence of emissions on the surface at Mar-a-Lago, and the damage caused to Mar-a-Lago by those emissions. The DEIS reflects that the only consideration given to the study was a single following cryptic comment "Noted". Otherwise, the FEIS completely ignores that study. This is hardly the proper analysis for a serious problem that is resulting in damage to a national historic landmark.

Response

In preparing the environmental impact analysis for the proposed Near-Term AIP and Long-Term AIP at PBI as contained in the FEIS, the FAA reviewed and considered a broad range of studies and reports pertaining to environmental resources within the FEIS study areas. These reports include the referenced 1992 Report: *Mar-a-Lago – Investigation and Analysis of Exterior Building Materials* by Ashford/van der Staak Restorations, the 1993 report: *Palm Beach International Airport – Air Quality Effects of Overflights on Mar-A-Lago* by KM Chng Environmental, Inc., as well as studies performed by other private research concerns, and state and Federal agencies, including the FAA. As documented in the KM Chng report, the deterioration of Mar-A-Lago's limestone may have many causes including inadequate maintenance by prior owners, high humidity and other climatic features of Mar-A-Lago's location, its immediate proximity to two bodies of salt water and air pollution. Limestone is vulnerable to attack by nitric and sulfuric acids in the atmosphere. Such acids reach and attack limestone either as a

component of rain (acid rain) or in the form of a dry deposition on limestone which combines with rain or high humidity. Such acids are formed in the atmosphere through the oxidation emissions of nitrogen and sulfur from many sources including power plants, incinerators, fossil-fuel-burning industrial and residential sources, and all transportation sources including motor vehicles on every road, aircraft, off-road vehicles, and power boats. Results of the analysis documented by KM Chng further indicate that the relative contribution of aircraft overflight emissions to this pollution is negligible.

As a result of this thorough analysis, and as documented in Section 5.2 of the FEIS, the FAA has determined that development of the Long-Term AIP or Long-Term Alternative 2 would result in a decrease in priority air pollutant emissions in the Long-Term AIP's or Long-Term Alternative 2's implementation year when compared to the No-Action Alternative. Therefore, Mar-a-Lago, within the APE, would not experience adverse air quality impacts as a result of the Undertaking.

Letter Codes

FP0040

5-5 **Comment**

The only analysis in the FEIS of the effects of air to ground contamination is a study that was conducted in 2008. That study measured contaminants reaching the ground at a brief interval at six points around the Airport. The results were averaged, and the results showed that there was insignificant contamination. The FEIS has once again employed the misleading use of averages. Only one of the test sites was in the direct departure flight path that leads east from the main runway toward Mar-a-Lago, which is where most of the air traffic is directed.

Response

In response to comments received during the EIS Scoping Process, an Ambient Deposition (Soot) Study was conducted by the FAA in an effort to identify and determine if atmospheric deposits in the area surrounding PBIA are caused by, or attributable to, the operation of the airport. There were six sites included in the Soot Study, including one located on the airport and one that was directly under PBIA's main arrival and departure flight track. Other sites were selected based on comments received from the public, a review of PBIA flight tracks, and site accessibility. The sampling locations enabled the comparison of atmospheric deposition samples collected at the airport, under flight paths, in the neighboring communities, near roadways, and at a control "background" location. Samples were collected over a six week period. The FAA believes the sampling took place over a long enough time frame and in enough locations to provide a representative sample of airborne depositional material in the PBIA area.

Two sampling modules measuring 2' by 4' were deployed at each of the study locations during the Soot Study. During analysis, total deposition for each site was determined by combining the materials from each of the two collectors. The data presented in the FEIS and Appendix E represents total deposition during the sampling period. No "averaging" of data was performed.

The outcome of the Soot Study indicates that emissions associated with PBIA are not a significant source of soot and other forms of atmospheric deposition in the vicinity of PBIA. In other words, the chemical make-up (or "fingerprints") of the community-collected samples near PBIA are not significantly different than those collected away from the airport. Moreover, these samples bear little resemblance to samples of jet, diesel, and gasoline fuels or the combustion byproducts from these fuels.

Letter Codes

FP0040

5-6 **Comment**

The FEIS does not include any soil samples that would show the amount of contamination created by years of jet emissions along the departure corridor.

Response

The identification of facilities that utilize hazardous and other regulated materials, as well as sites that are known or have the potential to contain environmental contamination on and near PBIA was accomplished through discussions with the Airport Sponsor and a review of Federal, state, and local electronic environmental databases. The air deposition study and other environmental analyses

conducted for the EIS did not include the collection soil samples.

The electronic database search of Federal, state, and local regulatory agency records did not reveal any sites or facilities within the Detailed Study Area (DSA) or on the airport that are included on the EPA National Priority List (NPL). NPL sites are considered by EPA to have the most significant public health and environmental risks to neighboring areas. Similarly, there are no reported municipal landfills; large-scale industrial/chemical facilities; or RCRA-permitted hazardous waste Treatment, Storage, and Disposal facilities in the DSA.

The outcome of the Soot Study indicates that emissions associated with PBIA are not a significant source of soot and other forms of atmospheric deposition in the vicinity of PBIA. In other words, the chemical make-up (or “fingerprints”) of the community-collected samples near PBIA are not significantly different than those collected away from the airport. Moreover, these samples bear little resemblance to samples of jet, diesel, and gasoline fuels or the combustion byproducts from these fuels.

See response to Comments 5-1 and 5-5.

Letter Codes

FP0040

5-7

Comment

The FEIS ignores evidence that substantiates the adverse effects of aircraft operations on Mar-a-Lago.

In the early 1990s a number of technical studies were conducted, which documented existing adverse effects on Mar-a-Lago from aircraft operations at PBIA. On November 24, 2008, Neal McAliley of White and Case provided the FAA with comments that summarized the results of these studies and outlined the harmful impacts of current aircraft operations on Mar-a-Lago (FEIS, Appendix K, Letter Code DP0080). It is important to note that these documented adverse effects were not limited to noise, but included damaging physical impacts on the historic structure itself. For example, the 1993 Murphy Study made the following observations and conclusions:

- Commercial aircraft continuously fly over Mar-a-Lago at very low altitudes, creating noise levels between 84 and 94 decibels.
- Hydrocarbons were found evenly distributed throughout the property and such a distribution is not indicative of a concentrated ground level source.
- It appears that a major cause of hydrocarbon buildup at Mar-a-Lago is caused by aircraft operations over the property at low altitudes.
- Combustion of hydrocarbons, including jet fuel, produces sulfur dioxide and nitrogen oxides, which oxidize in the air to form acid sulfate and acid nitrate.
- Limestone structures at Mar-a-Lago have experienced accelerated deterioration due to the presence of these acids.

These damaging impacts are exacerbated by the fact that for the past 15 years, the County has insisted that virtually all departing flights follow a route to the east that flies directly over Mar-a-Lago, rather than fanning the departure flight paths to disperse and dilute the air traffic and resulting impacts. (In fact, the County's refusal to implement a fanning procedure also significantly exacerbates congestion and delays, because it triples the required wait time between departing flights, in order to avoid dangerous wake turbulence from having flights too close together.)

Response

The FAA considered the November 24, 2008 letter (and attachments) submitted to the FAA by Neal McAliley of White and Case in the impact analysis associated with preparation of the FEIS. The FAA also considered other reliable scientific reports that presented competing data and analyses. See response to Comment 5-4. Analyses presented in the FEIS which relate to the types of issues raised

by Mr. McAliley are detailed below.

Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800, as amended) require Federal agencies to consider the effects of their actions on properties that may be eligible for listing or are listed in the National Register of Historic Places (NRHP). The FEIS was prepared in compliance with Section 106 of the NHPA and its implementing regulations. In defining a preliminary Area of Potential Effect (APE) for data collection purposes, the FAA was particularly sensitive to the presence of known historic resources, including the Mar-a-Lago National Historic Landmark (NHL). Please see response to Comment 13-1 for additional information.

The potential impacts to historic resources within the FEIS were based upon a thorough Cultural Resource Assessment Survey (CRAS) of the Proposed Project and its reasonable alternatives (the Undertaking) within the APE (see Appendix F of the FEIS). The FAA carefully considered this documentation in identifying historic and architectural resources, including historic neighborhoods that are: listed in the NRHP, eligible for NRHP listing, and not eligible for NRHP listing. The FAA summarized this documentation and stated its findings in Section 4.8.2 of the FEIS. The FAA exhaustively assessed the potential effects of the Undertaking on historic and architectural resources in Section 5.10 of the FEIS. Based on a review of the cultural resource documentation contained in the FEIS dealing with historic, archaeological, and historic architectural resources, the Florida SHPO determined that potential impacts to these resources were adequately addressed in the FEIS.

The FAA conducted detailed noise exposure and air quality analyses in the FEIS and found that the proposed Near-Term and Long-Term components of the AIP and Alternative 2 would not have a significant impact on Mar-a-Lago (see Section 5.12). For the noise analysis, actual flight tracks and approach/departure profiles were derived from PBI radar data collected over a period of one year. The FAA evaluated noise impacts to Mar-a-Lago, including the potential for noise to affect the property's historic attributes, and did not find that noise associated with the proposed Long-Term AIP or Long-Term Alternative 2 would be significant. The FAA also conducted detailed grid analyses using various supplemental metrics, including single-event metrics, and also did not find that noise associated with the proposed Long-Term AIP or Long-Term Alternative 2 would be significant (see Appendix D of the FEIS).

In response to community concerns about soot and hydrocarbons from aircraft overflights, the FAA collected air deposition samples in the vicinity of the airport, including locations in the vicinity of Mar-a-Lago on the intracoastal waterway and in Palm Beach. The study evaluated the chemical characteristics of airborne deposition samples against aircraft fuels and combusted fuel exhausts. The study indicates that emissions associated with PBI are not a significant source of soot-related air pollutants in the vicinity of the airport. See response to Comments 5-4 and 5-5.

The FAA considered a wide range of alternatives to the proposed overall AIP, including alternatives that would reduce overflights at Mar-a-Lago. Alternatives to the proposed overall AIP at PBI are discussed in Chapter 3.0 of the FEIS. "Fanning" of departing aircraft (also referred to as "alternate departure headings") is used by PBI ATCT to increase capacity and reduce delay at PBI during peak operational periods. Increased use of alternate departure headings as an alternative was evaluated in the FEIS. Airfield simulation modeling analysis included in the FEIS concluded that the increased use of "fanning" would have some beneficial effect at PBI in the near-term only, and that it would not increase the annual and hourly capacity of the airfield sufficiently to reduce average aircraft operational delay to acceptable levels. Also see response to Comment 2-31.

Letter Codes
FP0041

5-8 Comment

Given the current utilization patterns of Runway 10R/28L, about 79% of all operations at PBI 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 would occur on

an east-west axis. This means that the proposed project would result in almost 100% of PBIA'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 PBIA's expansion proposal.

Response

The FEIS contains a detailed analysis of air quality impacts associated with the No-Action Alternative, the overall AIP and Alternative 2 using accepted, standard tools as required by FAA Order 5050.4B (see Section 5.2 of the FEIS). The FAA reviewed the comment and notes that under current guidance, dispersion modeling was not required for the analysis of air quality impacts in the FEIS to evaluate the spatial redistribution of air quality impacts in the vicinity of PBIA. The FAA's ROD has limited its Selected Alternative to those actions that are ripe for decision at this time (Near-Term AIP) and; therefore, the decision contained in the ROD has no likelihood of redistributing air quality impacts in the vicinity of PBIA, as asserted in the comment.

Letter Codes

FL0001

5-9

Comment

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.

Response

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 (see Appendix E-2 for the Atmospheric (Soot) Deposition Study of the FEIS). For additional discussion, please see response to Comment 5-5.

Letter Codes

FL0001

5-10

Comment

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.

Response

The Near-Term AIP under consideration for unconditional ALP approval by the FAA would not generate significant environmental air quality impacts. The air emissions associated with the Near-Term AIP and Near-Term Alternative 2 are associated only with temporary construction activities. No changes in aviation activity affecting air emissions would take place. For further information, see Section 5.2.3 of the FEIS.

The FAA has coordinated with the EPA regarding proposed revisions to the ozone NAAQS. As shown in Section 5.2 of the FEIS, air emissions associated with PBIA are forecasted to increase in the future for some parameters (e.g., NO_x and PM), when compared to existing conditions due to the forecasted increase in operations over the EIS Study Years, with or without the proposed Long-Term AIP or Long-Term Alternative 2. However, this increase is expected to be minimized with the reductions in aircraft ground support equipment (GSE) and motor vehicle engine emission rates and the improved airfield efficiencies (taxi-times) associated with the Long-Term components of the AIP and Alternative 2. Other airport-related pollutants (e.g., VOCs) are expected to diminish over time. Of important note, the air emissions associated with the overall AIP would be less than the future No-Action Alternative, due to

improved airfield efficiencies associated with both its Near-Term and Long-Term components.

As a result of the 2009 TAF for PBI, the Airport Sponsor determined that the number of aircraft operations at PBI that previously justified the need for the expanded Runway 10R/28L at PBI may not be reached until 2030. As a result, the FAA has provided an accounting in the 2011 FEIS of potential future environmental impacts associated with the Long-Term components of the AIP and Alternative 2 based on the best information currently available. The FAA acknowledges that both operational conditions at the airport and the NAAQS may change over time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FF0002

5-11 **Comment**

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.

Response

The proposed airfield improvements at PBI would not induce activity or increase the number of aircraft and passengers using the airport when compared to the No-Action Alternative. The project would address airfield capacity issues and reduce aircraft operational delay to acceptable levels. However, FAA anticipates that the number of passengers using PBI would continue to increase over time, regardless of whether the proposed runway improvements were implemented or not. As a result, the FAA has provided an accounting in the 2011 FEIS of potential future environmental impacts associated with the Long-Term AIP and the Long-Term Alternative 2 based on the best information currently available. The FAA acknowledges that these conditions may change over time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FF0002

5-12 **Comment**

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.

Response

The Near-Term and Long-Term components of the AIP would not result in significant air quality impacts. Only the Near-Term AIP is being granted unconditional ALP approval in the FAA's ROD at this time, meaning only the Near-Term AIP project components will be given approval for implementation by the Airport Sponsor at this time. However, the FAA supports the Airport Sponsor's consideration of

EPA's recommendations regarding GHG reductions.

The Airport Sponsor has put in place a number of systems and procedures to reduce airport emissions which may contribute to GHG formation including the use of 400-Hertz electrical power and pre-conditioned air which are available at all gates at PBI, thereby diminishing the need for aircraft to operate their APUs.

In addition, construction-related GHG emissions associated with the Near-Term AIP would be reduced with the adoption of the following minimization measures:

- Obtain operating permits for any on-site concrete or asphalt plants.
- Prevent construction equipment and delivery trucks from excess idling during periods of inactivity.
- Prohibit open-burning.
- Require recurrent contractor training for fugitive-dust prevention/reduction measures and equipment exhaust controls.
- Substitute low- and zero-emitting equipment whenever possible.
- Use electrical drops in place of temporary electrical generators wherever possible.
- Utilize vapor-recovery systems for fuel-storage facilities.

These and other measures would become part of the Airport Sponsor's construction plans, specifications, permits, and other regulatory and construction-related documents that the construction contractors will be required to adopt and follow if the Airport Sponsor decides to construct the Near-Term AIP.

Letter Codes

FF0002

5-13 **Comment**

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 [increase].

Response

The Near-Term AIP, which has been granted FAA's unconditional ALP approval through this ROD, would not result in significant air quality impacts.

The EPA comment appears to direct the FAA to compare the "existing condition" to the future "with project" condition. CEQ, NEPA, and FAA's guidance directs the EIS document to evaluate and disclose the effects of the proposed project by comparing a future "build alternative" to a future No-Action Alternative, not with the existing condition. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FF0002

5-14 **Comment**

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.

Response

The FAA does not believe that such modeling is warranted at this time, because the only actions being granted unconditional ALP approval at this time are those associated with the Near-Term AIP.

Because the Near-Term components of the AIP do not even approach significant air emissions impact thresholds, the FAA does not believe the type of modeling requested in the comment would contribute to informed decision making on the project by the FAA. Please see response to Comment 5-10.

Letter Codes

FF0002

Palm Beach International Airport FEIS

6. Coastal Resources

6-1 **Comment**

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).

Response

The FAA acknowledges that based on the information in the 2011 FEIS, the State of Florida considers the overall AIP (both Near-Term and Long-Term components) to be consistent with the FCMP.

Letter Codes

FS0001

6-2 **Comment**

To ensure the project's continued 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.

Response

During the design phase and prior to construction activities, the Palm Beach County Department of Airports will coordinate with all applicable agencies to obtain the necessary permits and certifications to ensure continued consistency with the FCMP.

Letter Codes

FS0001

6-3 **Comment**

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.

Response

The FAA acknowledges the state's final concurrence with the FCMP will be determined during the environmental permitting process.

Letter Codes

FS0001

Palm Beach International Airport FEIS

7. Construction Impacts

7-1 Comment

The FEIS dismisses the environmental problems inherent with the demolition of the existing FBOs by noting that there will be a temporary increase in construction debris. The FEIS does not evaluate the economic impacts of the demolition on the subject FBOs, nor does the FEIS even provide an estimate of the quantities of construction waste which may be generated. The FEIS does not evaluate whether the demolition will result in hazardous waste, or how such hazardous waste will be disposed. Indeed, the FEIS does not even evaluate whether the current waste management resources in Palm Beach County can absorb the demolition materials associated with the FBO relocation, or whether other locales will be required for appropriate waste disposal of hazardous and non-hazardous demolition debris.

Response

Section 5.5.4 of the FEIS discusses solid waste generated during construction. It notes that demolition and construction wastes would be generated and that, subject to design parameters and product specifications, that some materials could be re-used or recycled. It is explained that construction waste not diverted, recycled, or re-used would be transported to and disposed in local permitted construction/demolition facilities or in a local waste-to-energy plant in accordance with applicable state and local requirements. Specific quantities of construction wastes have not been estimated because project design plans have not been prepared. However, metal FBO buildings, concrete aprons, and airfield pavements are largely recyclable. Also, the discussion of solid wastes in Section 5.9 of the FEIS, indicates that landfill capacity in Palm Beach County would not be significantly impacted by the proposed airport development.

Hazardous materials and fuel storage sites in the demolition areas are addressed in Section 5.9.4 of the FEIS. Based on the information collected and evaluated for the FEIS, development of the Near-Term or Long-Term components of the AIP and Alternative 2 would not result in significant impacts to existing sites, facilities, or operations involving hazardous materials or environmental contamination. Detailed site inspections and plans to handle any hazardous materials that may be encountered during construction would be developed during the design phase of the project.

Letter Codes

FP0040

7-2 Comment

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.

Response

A review of the current Surface Water Management Permit (No. 50-00471-S) issued by the SFWMD to the Airport Sponsor was conducted by the FAA. Permitted changes to the surface water management system are intended to accommodate the anticipated additional stormwater generated from the Airport Sponsor's planned airside and landside improvements at PBIA. In addition, a Stormwater Pollution Prevention Plan (SWPPP) was prepared by the Airport Sponsor in accordance with EPA guidelines and incorporated into the SFWMD permit.

A modification of SFWMD Permit No. 50-00471-S would be required for the Near-Term AIP. An NPDES permit has been issued for PBIA. The EPA's NPDES permit program regulates point-source discharges. Section 301 of the Clean Water Act establishes uniform national standards for discharges from various types of pollutant sources. The PBIA NPDES permit number is FLR00C111.

All necessary agency coordination, permits and certifications, as required, will be obtained by Palm Beach County Department of Airports during the design phase of this project and will be in place prior to construction activities.

Letter Codes

FS0001

7-3 **Comment**

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.

Response

Comment regarding the need for FDOT coordination and permitting for the development of the Military Trail entrance road component of the Near-Term AIP is noted.

All necessary agency coordination, permits, and certifications, as required, will be obtained by Palm Beach County Department of Airports during the design phase of this project and will be in place prior to construction activities.

Letter Codes

FS0001

7-4 **Comment**

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.

Response

Comment regarding SFWMD's regulatory authority over the ERP process for this project is noted.

All necessary agency coordination, permits, and certifications, as required, will be obtained by Palm Beach County Department of Airports during the design phase of this project and will be in place prior to construction activities.

Letter Codes

FS0001

7-5 **Comment**

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.

Response

All necessary agency coordination, permits, and certifications, as required, will be conducted and obtained by Palm Beach County Department of Airports during the design phase of this project and will be in place prior to construction activities.

Letter Codes

FS0001

7-6 **Comment**

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.

Response

The need to use FDOT right-of-way for the storage/staging of equipment and materials associated with construction will be determined during the design phase of the project. If use of public ROW is necessary, the Palm Beach County Department of Airports will coordinate with the FDOT District 4 PL&EM Office.

Letter Codes

FS0001

7-7

Comment

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.

Response

Minimal lane closures and traffic channeling is anticipated. Any potential lane closures or traffic channeling associated with construction will be coordinated between the Palm Beach County Department of Airports and the FDOT Traffic Operations Office.

Letter Codes

FS0001

Palm Beach International Airport FEIS
8. DOT Act: Section 4(f)

No comments related to DOT Act: Section 4(f) were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS

9. Farmlands

No comments related to Farmlands were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS
10. Fish, Wildlife, and Plants

10-1 **Comment**

I have recently spotted several birds of prey flying over the property. Can we check and see if there are any nesting birds in the area.

Response

Potential impacts to fish, wildlife, and plants are discussed in Section 5.7 of the FEIS. It was determined that neither the implementation of the AIP (Near-Term and Long-Term components) nor Alternative 2 would result in significant impacts to any wildlife or listed species, including birds of prey.

Letter Codes

FP0027

Palm Beach International Airport FEIS

11. Floodplains

No comments related to Floodplains were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS
12. Hazardous Materials, Pollution Prevention, and Solid Waste

- 12-1 **Comment**
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.).
- Response**
PBIA's Spill Prevention, Control & Countermeasure (SPCC) Plan contains a wide array of precautionary and incident response actions that help to ensure that hazardous materials and other regulated substances at PBIA are handled, stored, and disposed of properly. Contractor(s) would be required to prepare a SPCC Plan documenting the measures that will be taken to prevent accidental release to the environment and, should they occur, the corrective actions that will be in place to minimize any environmental impact. Please see response to Comment 12-5.
- Letter Codes**
FS0001
- 12-2 **Comment**
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.
- Response**
In the event areas of contamination are detected, or in the event of a spill or unanticipated release of regulated materials including fuels, contractors will be required to cease work in the immediate area and report the release to the National Response Center (NRC). The Florida Department of Environmental Protection will also be notified.
- Letter Codes**
FS0001
- 12-3 **Comment**
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.
- Response**
Dewatering, if required during construction, would be addressed in the Airport Sponsor's construction documents and any required permit modifications. Dewatering activities would be conducted in accordance with SFWMD permit conditions and specifications. A review of the current Surface Water Management Permit (No. 50-00471-S) issued by the SFWMD to the Airport Sponsor was conducted by the FAA. Permitted changes to the surface water management system are intended to accommodate the anticipated additional stormwater generated from the Airport Sponsor's planned airside and landside improvements at PBIA. In addition, a Stormwater Pollution Prevention Plan (SWPPP) was prepared by the Airport Sponsor in accordance with EPA guidelines and incorporated into the SFWMD permit.
- Letter Codes**
FS0001
- 12-4 **Comment**
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.
- Response**
As described in Section 5.9 of the FEIS, various forms of materials that are classifiable as hazardous or regulated would be used during construction on a temporary basis by the contractors. Consisting primarily of fuels and other petroleum based substances, these materials would be stored, transported, and disposed of in accordance with applicable regulations and BMPs. These include PBIA's SPCC

Plan, which contains a wide array of precautionary and incident response actions that help to ensure that hazardous materials and other regulated substances at PBIA are handled, stored, and disposed of properly. If hazardous materials are identified during construction activities, the FDOT District Four Maintenance Permits Office and other regulatory agencies will be notified and appropriate actions will be taken by the Airport Sponsor and the contractor.

Letter Codes

FS0001

12-5 **Comment**

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.

Response

It would be expected that contaminants relating to the current and/or past operations may be discovered during demolition of these facilities. Their discovery could also result in a regulatory oversight of the remedial effort. If hazardous materials are identified during construction activities, contractors will be required to cease work, and the proper regulatory agencies (e.g., National Response Center) will be notified and appropriate actions will be taken by the Airport Sponsor and the contractor.

All necessary agency coordination, permits, and certifications, as required, will be obtained by Palm Beach County Department of Airports during the design phase of this project and will be in place prior to construction activities.

Letter Codes

FS0001

12-6 **Comment**

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.

Response

PBIA's Spill Prevention, Control & Countermeasure (SPCC) Plan contains a wide array of precautionary and incident response actions that help to ensure that hazardous materials and other regulated substances at PBIA are handled, stored, and disposed of properly. Contractor(s) would be required to prepare a SPCC Plan documenting the measures that will be taken to prevent accidental release to the environment and, should they occur, the corrective actions that will be in place to minimize the environmental impacts.

In the event of a spill or unanticipated release of regulated materials including fuels, contractors will be required to cease work in the immediate area and report the release to the National Response Center (NRC). The Florida Department of Environmental Protection will also be notified.

Letter Codes

FS0001

12-7 **Comment**

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.

Response

Although specific quantities of temporary construction wastes have not been estimated, construction waste generated may include excavated material from airside perimeter roads. Clean soil and other suitable waste could be reused as fill material, buried, or recycled. All other material would be land-farmed or disposed of at permitted solid waste landfills, construction/debris landfills, and vegetative waste facilities.

All necessary agency coordination, permits, and certifications, as required, will be obtained by Palm Beach County Department of Airports during the design phase of this project and will be in place prior to construction activities.

Letter Codes

FS0001

12-8 **Comment**

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.

Response

Implementation of the Near-Term AIP, which the FAA has unconditionally approved on the Airport Sponsor's ALP through this ROD, does not include the filling or relocation of the Airport West Canal. The relocation of a portion of the Airport West Canal is a component of the Long-Term AIP, which the FAA has determined is not ripe for decision at this time. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FS0001

Palm Beach International Airport FEIS

13. Historic and Archaeological Resources

13-1 Comment

There are beautiful historic neighborhoods in the affected zone, which would suffer increased noise and traffic as a result.

Response

With respect to the Near-Term AIP, which is the only project being granted unconditional ALP approval in this ROD, there are no off-airport noise impacts or increases in air traffic.

With respect to the Long-Term AIP and Long-Term Alternative 2, off-airport noise impacts would be expected based on the analyses conducted for, and disclosed in, the 2008 DEIS and the 2011 FEIS. Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800, as amended) require Federal agencies to consider the effects of their actions on properties that may be eligible for listing or are listed in the National Register of Historic Places (NRHP). The FEIS was prepared in compliance with Section 106 of the NHPA and its implementing regulations. The potential impacts to historic resources were evaluated in the FEIS based upon a thorough Cultural Resource Assessment Survey (CRAS) of the Proposed Project and its reasonable alternatives' (the Undertaking) within the Area of Potential Effects (APEs) (see Appendix F of the FEIS). The FAA carefully considered this documentation in identifying historic and architectural resources, including historic neighborhoods that are: listed in the NRHP; eligible for NRHP listing; and not eligible for NRHP listing. The FAA summarized this documentation and stated its findings in Section 4.8.2 of the FEIS. The FAA exhaustively assessed the potential effects of the Undertaking on historic and architectural resources in Section 5.10 of the FEIS. Based on a review of the cultural resource documentation contained in the FEIS dealing with historic, archaeological, and historic architectural resources, the Florida SHPO determined that potential impacts to these resources were adequately addressed in the FEIS.

Letter Codes

FP0030

13-2 Comment

My family has been in the neighborhood to the east of the airport (Vedado) for over 60 years. The airport cannot undertake additional expansion without destroying what's left of this beautiful and enticing neighborhood.

Response

The FAA assessed the potential effects of the Undertaking on historic and architectural resources in Section 5.10 of the FEIS. The Vedado neighborhood has not been identified as an area to be acquired for the development of the AIP and relocation of residences within the neighborhood for mitigation purposes is not necessary. In addition, FAA determined that the Near-Term AIP did not increase noise over the Vedado Historic District. Please see response to Comment 13-1.

Letter Codes

FP0038

13-3 Comment

The FEIS does not consider the special status of Mar-a-Lago.

Response

The FEIS documented and considered the fact that Mar-a-Lago is a National Historic Landmark. In the FEIS, Mar-a-Lago is discussed as a DOT Act Section 4(f) resource (FEIS Section 4.4.2), as well as a historic resource (FEIS Section 4.8.2). Based on a review of the cultural resource documentation contained in the FEIS dealing with historic, archaeological, and historic architectural resources, the Florida SHPO determined that potential impacts to these resources were adequately addressed in the FEIS.

Letter Codes

FP0040

13-4

Comment

The FEIS ignores adverse impacts upon Mar-a-Lago due to pollution from the aircraft directly over Mar-a-Lago. As a result, Mar-a-Lago suffers significant adverse effects from noise and aircraft emissions which must be considered before approving any airport expansion plan.

Response

The FAA conducted a detailed analysis of aircraft noise and air quality impacts. Noise impacts are discussed in Section 5.12. Air quality impacts are discussed in Section 5.2 of the FEIS. The FAA did not identify any significant impacts to Mar-a-Lago that would occur if the Near- or Long-Term components of the AIP or Alternative 2 were implemented. In addition, the FAA consulted with the Florida SHPO during the Section 106 process, who did not disagree with the FAA's delineation of the Area of Potential Effect or the findings of no significant impact with respect to Mar-a-Lago. Based on a review of the cultural resource documentation contained in the FEIS dealing with historic, archaeological, and historic architectural resources, the Florida SHPO determined that potential impacts to these resources were adequately addressed in the FEIS.

Letter Codes

FP0040

13-5

Comment

In general, the National Trust is concerned that the FAA has not taken appropriate steps in its review of the AIP to fully understand and consider all the potential impacts that this project may have on surrounding historic resources, such as the National Historic Landmark property Mar-a-Lago, nor does the FEIS adequately consider the broad range of alternatives available to mitigate any and all potential impacts to these resources.

Response

The FEIS documented and considered the fact that Mar-a-Lago is a National Historic Landmark. In the FEIS, Mar-a-Lago is discussed as a DOT Act Section 4(f) resource (FEIS Section 4.4.2), as well as a historic resource (FEIS Section 4.8.2).

As described in Chapter 5.0 of the FEIS, FAA conducted an environmental analyses of those categories listed and described in Appendix A of FAA Order 1050.1E. Noise impacts are discussed in Section 5.12 of the FEIS. Air Quality impacts are discussed in Section 5.2 of the FEIS. The FAA did not identify any significant impacts to Mar-a-Lago that would occur if the Near- or Long-Term components of the AIP or Alternative 2 were implemented.

In defining a preliminary APE for data collection purposes, the FAA was particularly sensitive to the presence of known historic resources, including the Mar-a-Lago National Historic Landmark (NHL). The FAA considered a wide range of alternatives to the proposed overall AIP, including alternatives that would reduce overflights of Mar-a-Lago. Please see response to Comment 13-1 for additional information. Based on a review of the cultural resource documentation contained in the FEIS dealing with historic, archaeological, and historic architectural resources, the Florida SHPO determined that potential impacts to these resources were adequately addressed in the FEIS.

Letter Codes

FP0041

13-6

Comment

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.

Response

The FAA acknowledges that the STOF-THPO's has no objections to the to the FAA determination that there are no previously recorded archaeological resources within the archaeological APE of the Undertaking that are listed in or eligible for listing in the NRHP. The FAA further determined that, due to extensive disturbances from previous construction and demolition activities, the APE is unlikely to contain any NRHP-eligible archaeological resources. The FAA's findings and determinations are

included in Sections 4.9 and 5.10 of the FEIS and the Archaeological Assessment is included within Appendix F. If any archaeological resources of interest to the Seminole Tribe of Florida are found that may be impacted by the Undertaking, the FAA will inform the Tribe so that they may comment at that time.

Letter Codes

FF0003

13-7 **Comment**

This office [Florida Department of State, Division of Historic Resources, Office of the State Historic Preservation Officer (SHPO)] reviewed the referenced project for 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.

Response

The FAA acknowledges the FL SHPO's opinion that the FEIS adequately addresses historic, archaeological, and historic architectural resources.

Letter Codes

FS0002

13-8 **Comment**

The National Trust respectfully requests that its comments be considered and incorporated in the FAA's Record of Decision.

Response

Comment noted. The FAA has thoroughly reviewed the comments provided by the National Trust. Issues raised by the National Trust in its comments on the FEIS relating to the purpose and need for the proposed AIP and potential impacts on historic resources within the APE have been thoroughly considered by the FAA in the preparation of this ROD.

Letter Codes

FP0041

13-9 **Comment**

Vedado is now on the Federal Historic Registry – Do not destroy any more Florida historic homes.

Response

See response to Comment 13-2.

Letter Codes

FP0052

Palm Beach International Airport FEIS
14. Light Emissions and Visual Impacts

No comments related to Light Emissions and Visual Impacts were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS
15. Natural Resources and Energy Supply

No comments related to Natural Resources and Energy Supply were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS
16. Secondary (Induced) Impacts

No comments related to Secondary (Induced) Impacts were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS

17. Socioeconomic Impacts

17-1 Comment

This is the highest real estate tax in the county, therefore we should not have to have had all of this noise thrust upon us. The pbia-eis is using our air space and charging us taxes when they are using our space for their own benefit. They should have to pay us for the use of our air space. I would say that we should not have to pay the taxes that we do, but the noise pollution is destroying the monetary value of my home, not fair.

Response

The FAA exercises its authority to manage the use of the navigable airspace in a manner consistent with all applicable Federal laws. All aircraft operations at PBIA are conducted in accordance with Federal Regulations that prescribe the safe operations to and from the airport terminal airspace.

A 2008 Transportation Research Board (TRB) Study provides some insight on the effects of aviation noise on property values (TRB, 2008). This response summarizes the key points of the study. The TRB report notes that aviation noise has a direct effect on property value. The effects of aviation noise on the buyer and seller determine the value of properties within proximity to aircraft operations. The noise level at a given property location becomes one of many property features and amenities that make up the total value of that property.

Research conducted on the effects of aviation noise on property value used several different methodologies resulting in outcomes ranging from effects of substantial negative impact to effects of no impact.

A study conducted in the city of College Park, Georgia, concluded that noise did not significantly affect the values of residential properties (Lipscomb, 2003). Unique community demographics and characteristics attributed to this finding; specifically, many community residents were employed in airport-related occupations so distance from the airport (short work commute) was given greater importance during the home purchasing process.

A study conducted around Manchester Airport, England, showed that when using the Noise and Number Index (similar to DNL and no longer used), results revealed no significant negative relationship between noise and property value (Tomkins et al., 1998). Proximity to the airport also had significant impacts, but at a decreasing rate. The net impact was that property location in close proximity to the airport was a more important factor of property value than noise.

Results from a survey of 200 realtors and 70 appraisers in 35 suburban communities near Chicago O'Hare International Airport found that a significant segment of buyers lack adequate information about the noise environment, resulting in inflated bid prices and likely in disappointment after purchase (Frankel, 1991).

In summary, the TRB study notes that the studies of the effects of aviation noise on property values are highly complex owing to the differences in methodologies, airport/community environments, market conditions, and demand variables involved. Whereas most studies concluded that aviation noise effects on property value range from some negative impacts to significant negative impacts, some studies combined airport noise and proximity and concluded that the net effect on property value was positive. Prospective homebuyers were at times not well-informed about the noise levels of aircraft operations near the property of interest. Lack of information often led to high bid prices and possible disappointment after purchase. Homeowners that experienced an increase in noise levels bore the burden of aviation noise. However, once noise levels stabilized, the next homeowner was compensated once the property value adjusted owing to the effects of noise.

Letter Codes

FP0036

17-2 **Comment**

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.

Response

The Near-Term AIP, Near-Term Alternative 2, Long-Term AIP, and Long-Term Alternative 2 would result in the acquisition of a limited number of off-airport residential and business properties. However, these acquisitions and relocations would not result in shifts in population movement and growth, changes in public services demands, or significant changes in business and economic activity or appreciable change in employment. Therefore, they would have no appreciable impact on the economic makeup, the level of economic activity, or the local tax base in the FEIS study area. See Section 5.13 of the FEIS for additional information.

See response to Comment 17-1 for the effects of aviation noise on property values.

Letter Codes

FL0001

17-3 **Comment**

Planned roadway projects in the vicinity of the project should be considered.

Response

Section 4.14 of the FEIS describes past, present, and reasonably foreseeable major actions in the PBIA area for the purpose of considering potential cumulative impacts. The projects described in this section have been, or could be, undertaken with or without implementation of the proposed overall AIP or Alternative 2.

As described in Section 5.18 of the FEIS, the cumulative projects (including I-95 improvements, Southern Boulevard (SR 80) Improvements, Military Trail, and PBIA Interchange) would generate environmental impacts, none of which are considered to be significant. The government agency responsible for the development of each cumulative project will be responsible for obtaining all necessary approvals and permits to minimize impacts.

Based on the types of cumulative projects already constructed or planned for the area surrounding PBIA, the FAA has concluded that the implementation of the Near-Term AIP, Near-Term Alternative 2, Long-Term AIP, or Long-Term Alternative 2, along with the cumulative projects, would not result in a significant cumulative impact.

Letter Codes

FS0001

Palm Beach International Airport FEIS

18. Environmental Justice

18-1 **Comment**

Where is the social justice? This is one of the most impacted areas, the segment of the population that is going to be exposed to noise and pollution. Hundreds of children and elderly people without a voice, without a vote, without a COMMENT!

Response

Section 5.14 of the FEIS describes the potential environmental justice impacts associated with the Near-Term AIP and Near-Term Alternative 2, when compared to the No-Action Alternative. As discussed in the FEIS, neither the Near-Term AIP nor Near-Term Alternative 2 would result in disproportionately high and adverse environmental effect on minority or low income populations. With respect to the Long-Term AIP and Long-Term Alternative 2, although mitigation measures are not warranted for Environmental Justice reasons, mitigation measures being proposed to address other environmental categories, such as noise, would benefit and further reduce impacts to individuals qualifying as minority or below poverty under the environmental justice orders (DOT Order 5610.2 and Executive Order 12898). Also see Response to Comment 18-3.

Letter Codes

FP0028

18-2 **Comment**

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.

Response

Neither the Near-Term AIP nor the Near-Term Alternative 2 would result in any significant impacts, including Environmental Justice impacts. See Tables 5.14.4-1, 5-14.4-2, 5.14.4-3, and 5.14.4-4 of Section 5.14 of the FEIS for a tabulation of the potential impacts to minority and low-income populations of the Long-Term AIP and Long-Term Alternative 2. Also see Response to Comment 18-3.

Letter Codes

FF0002

18-3 **Comment**

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.

Response

The Near-Term components of both the AIP and Alternative 2, which include several independent utility projects that may be implemented by the Airport Sponsor by 2015, would not result in significant environmental impacts from either construction or operation, which would warrant the development and implementation of mitigation measures.

Mitigation measures that could apply to both the Long-Term AIP and Long-Term Alternative 2 are discussed in Section 6.2 of the FEIS. Additionally, Section 6.3 of the FEIS describes a potential mitigation program for the FAA's Preferred Alternative, the overall AIP. It should be noted, however, that as a result of the delayed need for the runway, the FAA has provided an accounting of potential future environmental impacts associated with the Long-Term AIP and Alternative 2 based on the best information currently available. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the

project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FF0002

Palm Beach International Airport FEIS
19. Children's Environmental Health and Safety Risks

No comments related to children's health and safety risks were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS

20. Water Quality

20-1 **Comment**

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).

Response

Implementation of the Near-Term AIP or Near-Term Alternative 2 would result in the development of additional impervious surface area within PBIA property, which would result in an increased volume of stormwater runoff entering the airport's drainage system. In addition, short-term and temporary water quality impacts may result from construction activities which have the potential to exceed applicable State of Florida water quality standards due to temporary erosion, increased turbidity, sedimentation, and potential release of fuels and lubricants. However, project-specific BMPs; implementation of erosion-control measures specified in FAA AC 150/5370-10E, Standards for Specifying Construction of Airports (FAA, 2010); and the implementation of project-specific design criteria to minimize erosion and sedimentation would prevent and/or minimize potential water quality impacts. The Airport Sponsor will be required to obtain an NPDES Permit for construction activities, which requires measures to minimize the potential for exceeding applicable water quality standards during construction activities. Operational impacts are considered to be negligible since neither the Near-Term AIP nor Long-Term AIP project components would induce or alter aircraft operational activity at PBIA.

Letter Codes

FF0002

20-2 **Comment**

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).

Response

See response to Comment 20-1.

Letter Codes

FF0002

20-3 **Comment**

The airport is covered under an existing Surface Water Management Permit. A modification to that permit will be necessary for the proposed new facilities.

Response

Comment noted. All necessary agency coordination, permits, and certifications, as required, will be obtained by Palm Beach County Department of Airports during the design phase of the Near-Term AIP and will be in place prior to construction activities.

Letter Codes

FS0001

Palm Beach International Airport FEIS

21. Wetlands

No comments related to wetlands were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS
22. Wild and Scenic Rivers

No comments related to wild and scenic rivers were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS

23. Quality of Life

23-1 **Comment**

It is clear from the FEIS that the proposed new major east/west runway at PBI 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 historically designated neighborhoods, as well as districts with significant numbers of minority populations.

Response

Only the Near-Term AIP is being granted unconditional ALP approval in this ROD. The Near-Term AIP includes several independent utility projects that may be implemented by the Airport Sponsor by 2015, and which are not anticipated to increase or induce aircraft activity at PBI beyond that which would normally occur, with or without the Near-Term AIP. As documented in the FEIS, these projects would not result in significant environmental impacts, from either construction or operation, which would warrant the development and implementation of mitigation measures.

The analysis of the potential environmental impacts associated with the Long-Term AIP and Long-Term Alternative 2 included the evaluation of 18 different environmental, social, and socioeconomic categories of impact. In most categories there would be minimal impact, or less than significant impact, and these impacts would not require mitigation. As discussed in Section 5.14 of the FEIS, neither the overall AIP nor overall Alternative 2 would result in disproportionately high and adverse environmental effect on minority or low income populations. With regard to historic resources, Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800, as amended) require Federal agencies to consider the effects of their actions on properties that may be eligible for listing or are listed in the National Register of Historic Places (NRHP). The FEIS was prepared in compliance with Section 106 of the NHPA and its implementing regulations. The potential impacts to historic resources documented within the FEIS were based upon a thorough Cultural Resource Assessment Survey (CRAS) of the AIP and its reasonable alternatives' (the Undertaking) within the Area of Potential Effects (APEs) (see Appendix F of the FEIS). The FAA carefully considered this documentation in identifying historic and architectural resources, including historic neighborhoods that are: listed in the NRHP, eligible for NRHP listing, and not eligible for NRHP listing. The FAA summarized this documentation and stated its findings in Section 4.8.2 of the FEIS. The FAA exhaustively assessed the potential effects of the Undertaking on historic and architectural resources in Section 5.10 of the FEIS and the SHPO concurred with the FAA's analysis and conclusions in the FEIS. A copy of the SHPO's correspondence to the FAA is contained in Appendix B of this Record of Decision. The Long-Term AIP does have the potential to result in significant noise impacts to areas to the west of PBI (see Section 5.12 of the FEIS).

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the 2011 FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to comply with NEPA so that the FAA may render a final decision on the Airport Sponsor's request for an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0005

23-2 **Comment**

I know airport usage has been declining and previous studies no longer support any expansion of the airport. I understand that if there was a good reason to build a new runway (and there is not!) that it would be closer to Southern Blvd. and the planes would fly exactly over my home on Magnolia Street (I measured it out based on the specific details provided a year or so ago). This would necessitate the

buyout of all the homes remaining in my neighborhood (especially my block) and destroy the historically designated neighborhood of Vedado.

Response

See response to Comments 1-8 and 23-1.

Letter Codes

FP0017

23-3 **Comment**

As someone who has spent all of her life here I can say that this expansion is a huge mistake. Not only for the families that grew up here and are now raising their children here- but for the history and small town feel that this would be destroying. Please consider all sides of this expansion...before you decide to destroy generations of neighborhoods for mere financial gain. There is something to be said about keeping a community small and I think in this case West Palm Beach would benefit from it. We don't need more traffic, more fast food places, more rental cars and hotels or more airplane traffic...we need to keep West Palm what it became famous for a quaint, friendly, beachy town.

Response

Commenter's concerns regarding quality of life are noted. As documented in the FEIS, the Near-Term AIP, Near-Term Alternative 2, Long-Term AIP, and Long-Term Alternative 2 would result in the acquisition of a limited number of off-airport residential and business parcels. However, these acquisitions and relocations would not result in shifts in population movement and growth, changes in public services demands, or significant changes in business and economic activity or appreciable change in employment. Therefore, they would have no appreciable impact on the economic makeup of the FEIS General Study Area (GSA), the level of economic activity in the GSA, or local tax bases. See Section 5.13 of the FEIS for additional information.

Only the Near-Term AIP is being granted unconditional ALP approval in this ROD. The approved projects include several independent utility projects that may be implemented by the Airport Sponsor by 2015, and which are not anticipated to increase or induce aircraft activity at PBIA beyond that which would normally occur, with or without the Near-Term AIP. However, As documented in the FEIS, these projects would not result in significant environmental impacts, from either construction or operation, which would warrant the development and implementation of mitigation measures. Also, please see response to Comment 23-1.

Letter Codes

FP0034

23-4 **Comment**

- [1] Using airspace that we own
- [2] Not paying us for it
- [3] charging us taxes when you have thrust deafness in the future on us (Like radiation from a reactor)
- [4] not spreading the private planes to other airports in the county
- [5] not flying over the interstates which are commercial for the most part
- [6] Not requiring planes to have better mufflers and to fly at a higher altitude upon takeoff
- [7] Not really doing anything about how loud the planes are.
- [8] They should not be aloud to fly if they do not comply with more quiet inforcements [sic].

Response

[1 and 2] The FAA exercises its authority to manage the use of the navigable airspace in a manner consistent with all applicable Federal laws.

[3] Only the Near-Term AIP is being granted unconditional ALP approval in this ROD. The approved projects include several independent utility projects that may be implemented by the Airport Sponsor by 2015, and which are not anticipated to increase or induce aircraft activity at PBIA beyond that which would normally occur, with or without the Near-Term AIP. As documented in Section 5.12 of the FEIS, these projects would not result in significant noise impacts, from either construction or operation, which would warrant the development and implementation of mitigation measures. A majority of the construction cost of the Near-Term Alternative will likely be funded with Passenger Facility Charge (PFC) collections. PFCs are imposed at PBIA today and the collection period would be modified to

cover eligible costs. Other funding sources may include FAA Airport Improvement Program grants and grants from the Florida Department of Transportation.

[4] The FAA does not have the authority to direct or place influence upon general aviation aircraft operators to shift their activity and services from one airport to another. Section 3.3.4 of the FEIS evaluated the option of using other airports as a supplemental airport to PBIA. This alternative did not meet the Purpose and Need criteria for the proposed project.

[5] Aircraft flight tracks are designed for efficient use of airspace. Following ground highway corridors would not be practical for air navigation and safety.

[6] A significant majority of commercial aircraft meet Stage 3 noise standards. Older technology aircraft such as the DC-9 are hush-kitted to meet the Stage 3 noise standards; however, very few of these aircraft remain in the U.S. fleet. The Airport Sponsor implements voluntary noise abatement procedures to try to reduce noise impacts to the communities in proximity to PBIA.

[7-8] The Airport Sponsor conducted a Part 150 Noise Compatibility Study for PBIA, implements voluntary noise abatement procedures and discourages noisy flights at night. The Airport Sponsor has also implemented a program to mitigate incompatible land uses caused by aircraft noise. Also see response [6].

Letter Codes

FP0036

23-5

Comment

My reasons against the expansion are as follows:

1. Additional pollutants [sic], vibrations and noise
2. There is no demonstrated or viable reason to expand PBIA; instead ONCE VIABLE REASONS ARE ESTABLISHED AND VETTED for any additional expansion, said expansion should take place in North County Airport.
3. This attempted expansion is NOTHING MORE than a complete fraud and misuse of taxpayer funds. In an age where our beloved Nation needs to cut back, it seems the usual status quo nutjobs are at the helm trying to place their names on some piece of useless budget expenditures. For what? To make themselves feel more constructive, effective and worthwhile? I assure you, cutting back on spending which is doing what is right and what is hard is the higher road to achieving these intentions.

Response

Only the Near-Term AIP is being granted unconditional ALP approval in this ROD. The approved projects include several independent utility projects that may be implemented by the Airport Sponsor by 2015, and which are not anticipated to increase or induce aircraft activity at PBIA beyond that which would normally occur, with or without the Near-Term AIP. As documented in Section 5.12 of the FEIS, these projects would not result in significant noise impacts, from either construction or operation, which would warrant the development and implementation of mitigation measures. The analysis of the potential environmental impacts in the FEIS associated with the Long-Term AIP and Long-Term Alternative 2 considered 18 different environmental and social, and socioeconomic categories of impact. In most categories there would be minimal impact, or less than significant impact, and these impacts would not require mitigation. However, the proposed Long-Term AIP and Long-Term Alternative 2 would have significant noise and land use impacts. Mitigation measures for significant noise and land use impacts are discussed in Sections 6.2 and 6.3 of the FEIS.

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the 2011 FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to comply with NEPA so that the FAA may render a final decision on the Airport Sponsor's request for an airfield capacity enhancement

project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

A majority of the construction cost of the Near-Term AIP will likely be funded with local funds, private sector developer funding, or Passenger Facility Charge (PFC) collections and not taxpayer funds. Other funding sources may include FAA Airport Improvement Program grants and grants from the Florida Department of Transportation.

Also, see response to Comments 1-1, 1-33, and 2-41.

Letter Codes

FP0038

23-6 **Comment**

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 PBI A 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.

Response

As documented in the FEIS, the Near-Term AIP would not result in any significant environmental impacts. Commenter's concerns regarding quality of life within the City of West Palm Beach are noted. Please see response to Comment 23-1 and 23-5.

Letter Codes

FL0001

23-7 **Comment**

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.

Response

See response to Comment 23-1 and 23-5.

Letter Codes

FL0001

23-8 **Comment**

It is clear from the FEIS that the proposed new major east/west runway at PBI A 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.

Response

See response to Comment 23-1 and 23-5.

Letter Codes

FL0001

23-9 **Comment**

The proposed project is consistent with Strategic Regional Policy Plan. It supports Regional Goal 8.1 – Public facilities which provide a high quality of life.

Response

FAA acknowledges that the proposed project is consistent with the Strategic Regional Policy Plan's Goal #8.1- Public facilities which provide a high quality of life.

Letter Codes

FS0001

Palm Beach International Airport FEIS

24. Safety

No comments related to safety were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS

25. Cost Considerations

25-1 **Comment**

In closing, it is often stated that the airports in this country do not use tax dollars for operation. A statement such as this one is a matter of semantics. While there are no government tax dollars supporting airport projects, Passenger Facility Charges and other fees to airlines certainly are paid by people who pay taxes. Granted, the fees and charges do not go into the public tax coffers, but ARE paid by the public. To entertain unnecessary expansion efforts at a time when oil prices are affecting the cost of air travel all over the world is questionable at best.

Response

Only the Near-Term AIP is being granted unconditional ALP approval in this ROD. The Near-Term AIP includes several independent utility projects that may be implemented by the Airport Sponsor by 2015. These Near-Term projects, if implemented by the Airport Sponsor, would use PFC funds and Federal, state, private, and local funds. The Federal and state funds are derived from user fees (e.g., PFC collections), taxes paid on aviation fuels, and other aviation-related sources. Any future unconditional ALP approval of capacity enhancements at PBIA, if granted by the FAA, would need to be supported by a positive cost/benefit study. For a discussion of the need for a cost/benefit study at this time, see response to Comment 2-16.

Letter Codes

FP0025

25-2 **Comment**

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.

Response

The FEIS provided, for the purpose of evaluating alternatives, a planning-level estimation of construction costs for the overall AIP and for each alternative evaluated in the Level 2 screening process. Because the Near-Term AIP was a component of the overall AIP (although having independent utility from the overall AIP), the FAA determined that the development of cost estimates for the Near-Term AIP by itself was not warranted. In developing cost estimates for the overall AIP the FAA reviewed the Airport Sponsor's Capital Improvement Plan and updated and/or prepared conceptual cost estimates for the proposed overall AIP and the alternatives that were evaluated in the Level 2 screening process. For comparison purposes and for the Level 2 evaluation of alternatives, conceptual cost estimates for the No-Action Alternative, the AIP, Alternative 2, and Alternatives A-3, A-8, A-9, A-11, A-13, A-14, and A-15 were summarized and included in the FEIS. The FAA did not have access to detailed information that would permit the development of cost details or an itemized breakdown of costs in the FEIS. The level of planning and design necessary to develop detailed cost estimates is not typical at this stage of the NEPA process. However, the FAA found the information provided by the Airport Sponsor to be reasonable for the purposes of comparative alternatives evaluation. Also, see response to Comments 2-15 and 2-16.

Letter Codes

FL0001

Palm Beach International Airport FEIS

26. Other Considerations

26-1 **Comment**

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.

Response

The FAA acknowledges that the U.S. Fish and Wildlife Service has no further comments on the FEIS at this time.

Letter Codes

FF0001

26-2 **Comment**

There is growing question over the propriety of the hiring the PBIA EIS project manager from URS Corporation by the Federal Aviation Administration and charging him with the duties of collecting and categorizing the comments received from the public and local governments. An investigation should be required to bring all facts of this action out to the public.

Response

URS Corporation was selected by the FAA during in 2006 to assist the FAA with the development of the Palm Beach EIS. The EIS is conducted under what is referred to as a "Third-Party Agreement" where the Airport Sponsor pays the consultant, but the FAA directs the work of the consultant, supervises, and controls the analyses prepared by the consultant (including preparation of responses to comments), and determines the scope, content, and methodologies of the EIS. In fact, while the Airport Sponsor is consulted for its input in areas of its expertise regarding airport specific facts and conditions, the Airport Sponsor is otherwise not permitted to direct the consultant with respect to the content of the FEIS. That is solely within the rights and responsibilities of the FAA as established in the Memorandum of Agreement (MOA) between the FAA and the Airport Sponsor which is executed prior to the selection of a consultant. In essence, an EIS consultant stands in the shoes of an FAA employee, and is under the direct supervision and control of the Agency. For this reason, the concerns expressed in the comment carry no weight, because Mr. Nagy's role in the preparation of the EIS has at all times been under the direction of the FAA, regardless of whether he was formally employed by URS or now as an FAA employee. Mr. Nagy's potential employment was fully vetted for potential conflicts of interest, and none were found.

In addition, the FEIS was substantially complete when Mr. Nagy was hired by the FAA in January 2011. Prior to Mr. Nagy's employment with the FAA, the agency considered and determined that hiring Mr. Nagy would not involve a conflict of interest.

Letter Codes

FP0003

26-3 **Comment**

I have significant concerns regarding the impacts of the proposed Palm Beach International Airport (PBIA) expansion project and request that the Federal Aviation Administration (FAA) deny the County Department of Airports' request of approval of this project through the Final Environmental Impact Statement (FEIS).

Response

Only the Near-Term AIP is being granted unconditional ALP approval in this ROD. The Near-Term AIP includes several independent utility projects that may be implemented by the Airport Sponsor by 2015. The Commenter's concerns regarding potential environmental impacts, and request that the FAA deny approval of the overall AIP, are noted. See response to Comment 1-1 regarding the status of the Long-Term AIP.

Letter Codes

FP0005

- 26-4 **Comment**
I always choose PBI over FLL and MIA. The reason: it's size, it's accessibility and it's friendliness. You will lose that when you expand and you will lose the majority of us who come to Palm Beach and surroundings for that very reason.
Response
The comment stating concern that the airport expansion would affect the size, accessibility, and friendliness of PBI is noted.
Letter Codes
FP0006
- 26-5 **Comment**
The FAA should deny both conditionally and unconditionally the County Department of Airports' request approval for this project through the Final Environmental Impact Statement (FEIS).
Response
The Commenter's request that the FAA deny, both conditionally and unconditionally, the AIP is noted. See response to Comments 1-1 and 1-2 regarding the approvals granted in this ROD.
Letter Codes
FP0008 FP0024
- 26-6 **Comment**
Since no modeling or Environmental Assessment of the alternatives was performed using the 2009 TAF, the FAA should update the study with the 2010 TAF which was published by the FAA prior to the release of this report and incorporate this data in all of the modeling analysis of the Impacts of the project.
Response
The baseline noise and air quality analyses presented in Section 4.0 of the FEIS were updated using data from the FAA's 2009 TAF. As noted in Section 3.1.3 of the FEIS, the Airport Sponsor and FAA cannot accurately predict when aviation activity may return to the previously experienced levels that resulted in unacceptable operational delay at PBI. The FAA acknowledged that aircraft operational levels at PBI have declined since the DEIS was published in September 2008 and that conditions at PBI, FAA policies and guidance, and aviation-related technology may change over time. However, the FAA provided an analysis of the environmental impacts of the alternatives based on the best information currently available. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Because the FAA's 2010 TAF was released just prior to the publication of the FEIS, and was not materially different from the 2009 TAF, further revisions and updates of the FEIS using the 2010 TAF were not practical or necessary.
Letter Codes
FP0008 FP0024
- 26-7 **Comment**
According to Bart Vernace, P.E. FAA's PBI EIS Study Manager, the FAA has never before issued a conditional approval in an EIS. This is unprecedented and creates a precedent for future EIS evaluations. The precedent set is that a projected moderate upward trend in the TAF evaluations (which is counter to the actual data) can be used to justify evaluating proposed alternatives based upon some imaginary "Future Year" and get unconditional approval for parts of the project and conditional approval for other parts of the project. This is an abuse of the Federal Environmental Impact Statement

evaluation process.

Response

The FAA's consideration of a mixed (unconditional and conditional) ALP approval in an EIS is not common, because circumstances typically do not warrant this type of ALP approval. However, a mixed ALP approval is permissible under NEPA and FAA guidance.

The FAA generally disagrees with the statement that the "precedent set is that a projected moderate upward trend in the TAF evaluations (which is counter to the actual data) can be used to justify evaluating proposed alternatives based upon some imaginary 'Future Year' and get unconditional ALP approval for parts of the project and conditional ALP approval for other parts of the project." First, as discussed in Section 1.1 of the FEIS, the FAA found that the development items included in the Near-Term AIP do not rely for their justification on the proposed Runway 10R/28L expansion project and are, therefore, justified for approval now. The discussion of the Airport Sponsor's goal and objectives for the Near-Term AIP, which provides additional information regarding the independent utility of each component of the Near-Term AIP, is provided in Section 2.3 of the FEIS.

Second, the FAA also states in the FEIS that the Long-Term AIP would be considered by the FAA for unconditional ALP approval in the future only when the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay. Simply put, the TAF projections referenced in the FEIS do not provide the basis to justify the Long-Term AIP. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the 2011 FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to comply with NEPA so that the FAA may render a final decision on the Airport Sponsor's request for an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Last, the FAA indicated that very unique factual circumstances surrounded this project (where primary components of the purpose and need, which were applicable at the start of the NEPA process, were subsequently undermined in the middle of the EIS process due to circumstances beyond the control of the FAA or Airport Sponsor). These unusual circumstances required an approach that would not be typical for FAA NEPA reviews. For that reason, it is highly unlikely that the unique factual circumstances that warranted taking the present approach will again be experienced, setting a "precedent" for another project to be handled as this one has been. Even if the current approval did set a precedent, issuing a Mixed ALP approval, even after environmental review, is not prohibited under FAA's policies and environmental Orders.

Letter Codes

FP0008 FP0024

26-8

Comment

The FAA needs to use data points that are within the TAF to evaluate the alternatives. Using imaginary data points that are outside of the domain of the TAF and outside of the acceptable forecast consistency range and which predetermines the outcome of the Alternatives analysis is misleading and deceptive.

Response

As discussed in Section 3.1.3 of the FEIS, the Airport Sponsor and FAA cannot accurately predict when aviation activity may return to the previously experienced levels that resulted in unacceptable operational delay at PBIA. The FAA acknowledges that aircraft operational levels at PBIA have declined since the DEIS was published in September 2008 and that conditions at PBIA, FAA policies and guidance, and aviation-related technology may change over time. However, the FAA provided an analysis of alternatives in the FEIS based on the conditions that were valid at the time the request was made by the Airport Sponsor for the unconditional ALP approval of the overall AIP.

The FAA may reassess potential alternatives to the Long-Term AIP, if warranted, when the expansion of Runway 10R/28L is ripe for decision and the Airport Sponsor requests the FAA's unconditional ALP approval of the airfield capacity enhancement components of the Long-Term AIP. For the FEIS, the FAA retained the alternatives analysis contained in the September 2008 DEIS. The FEIS' alternatives analysis included some revisions that were made by the FAA in response to public and agency comments on the DEIS.

Because the Airport Sponsor does not intend to take action to expand the capacity of the airport until aviation activity levels at PBIa again supports the need for such action (as they did at the time the DEIS was prepared), the alternatives evaluation presented in the FEIS was based on the assumption that the operational levels warranting the Runway 10R/28L capacity improvement project, as described in the DEIS, have returned to PBIa.

Letter Codes

FP0008 FP0024

26-9 **Comment**

The EIS is ambiguous and unclear on when the County should come back to receive approval for the portions of the project that are conditionally approved.

Response

The FAA's intent, as expressed in the FEIS and again in this ROD, is for the Airport Sponsor to approach the FAA regarding capacity enhancements when operational levels again produce unacceptable levels of aircraft operational delay. In fact, by the very nature of the conditional ALP approval being given for the Long-Term AIP, the Airport Sponsor cannot construct any long-term project without first receiving unconditional ALP approval. The FAA believes that this intent has been clearly stated. The FAA will undertake the appropriate additional NEPA processing if and when the number of aircraft operations at PBIa returns to the levels that would cause unacceptable aircraft operational delay and the Airport Sponsor requests unconditional ALP approval of an airfield capacity enhancement project at PBIa. The 2009 TAF indicates that the level of activity at PBIa (approximately 204,054 aircraft operations) that would begin to cause unacceptable delay would be reached around the 2030 time frame. Due to ongoing economic conditions, the 2010 TAF indicates that 204,054 operations may not be reached at PBIa until 2034, while the 2011 TAF indicates these operational levels may not occur until 2039. To be clear, these operational levels are merely a guide as to when unacceptable levels of aircraft operational delay may be expected to again occur based on past experience at PBIa. The identified operational levels do not represent an automatic unconditional ALP approval threshold, nor are they a required minimum operational level for consideration of airfield capacity improvements. Congestion and delay conditions will be the basis for FAA's renewed consideration of a request by the Airport Sponsor for an airfield capacity enhancement project. However, FAA understands the limitations and variability inherent within a long-range forecast and would not consider the possibility for a more rapid or slower economic and aviation activity recovery to be unreasonable.

Letter Codes

FP0008 FP0024

26-10 **Comment**

The EIS is also ambiguous on the level of environmental studies needed to get unconditional approval of the conditional portion of the project. Since an EIS is only good for 5 years based upon changing conditions and data that is outdated and no longer relevant the EIS should state this and make it clear that if PBIa does not reach this condition within 5 years a new Full EIS would need to be conducted.

Response

The Commenter is correct that the FEIS does not spell out with precision the type of future NEPA documentation that will be required to support consideration of unconditional ALP approval for capacity enhancements at PBIa. That is because rendering such a decision at this time would be premature. See Sections 12.0 and 13.0 of this ROD regarding the need for further environmental documentation prior to unconditional ALP approval of airfield capacity enhancements at PBIa. The FAA and/or the Airport Sponsor will undertake the appropriate additional NEPA processing for the Long-Term AIP when the number of aircraft operations at PBIa returns to the levels that would cause unacceptable

aircraft operational delay. The FAA's 2009 TAF suggests that the number of aircraft operations at PBI that previously justified the need for the expanded Runway 10R/28L at PBI may not be reached until 2030. However, if conditions at PBI change such that the Long-Term AIP and its Connected Actions are again justified, based on FAA guidance, at an earlier time frame than forecast in the 2009 TAF, the Airport Sponsor may request the FAA's consideration of the Long-Term AIP for unconditional ALP approval at such time. Further NEPA review will be conducted consistent with FAA Order 5050.4B, paragraph 1401.c.

Letter Codes

FP0008 FP0024

26-11 **Comment**

This study is a waste of 2.6 million dollars in public funds, which is leading us towards wasting between 370 million to 730 million dollars of public funds. The FAA should do the right thing and deny both conditionally and unconditionally the County Department of Airports' request of approval for this project through the Final Environmental Impact Statement (FEIS).

Response

The FAA acknowledges the Commenter's request to deny both conditionally and unconditionally the Airport Sponsor's proposed AIP.

In regard to the use of public funds towards constructing the AIP, the FAA notes that the economic events and recession that have taken place since late 2008 resulted in a substantial decrease in activity in the national airspace system and at PBI. As a result, the FAA is not considering unconditional ALP approval of the airfield capacity improvement components of the AIP (relocation and extension of Runway 10R/28L and connected actions) at this time. A Cost/Benefit analysis is not required to satisfy NEPA obligations. However, a Cost/Benefit analysis would be required at such time that the Airport Sponsor seeks Federal grant funding for capacity enhancements at PBI.

Letter Codes

FP0008 FP0024

26-12 **Comment**

Has the FAA EVER produced an FEIS with two stages (near-term and long-term)?

Response

NEPA documents usually are prepared for projects that would be initiated within a reasonable time frame (usually within three years). In the case of the PBI EIS, unanticipated economic events, which affected the level of aviation activity at PBI and across the nation, resulted in the Airport Sponsor requesting only unconditional ALP approval of the Near-Term AIP, which has independent utility from the overall AIP. The airfield capacity enhancement elements of the AIP (runway expansion) were determined to not be needed at this time and only conditional ALP approval was requested by the Airport Sponsor. The FAA's evaluation in an FEIS of a project with two stages is not typical, but is allowed under NEPA and FAA guidance. In fact, FAA Order 5050.4B specifically references NEPA procedures for "staged projects or projects requiring successive federal approvals." FAA Order 5050.4B, paragraph 1401.c.(3).

Letter Codes

FP0013

26-13 **Comment**

How can it be justified to give conditional approval for a runway 20 years from now? Permitting near-term expansion that will ultimately lead to the long-term expansion project originally sought by the airport sponsor is outside the FAA's scope for this EIS as it was contracted.

Response

The FAA, as a matter of ordinary business practice, grants conditional ALP approval of Airport Layout Plans (ALPs) consistent with its own guidance in FAA Order 5050.4B, paragraph 202.c. The PBI ALP depicts the proposed overall AIP. Conditional ALP approval signals that: 1) the proposed features are safe and efficient, 2) environmental review is not completed or the features are not yet ripe for decision, or 3) the FAA has not approved the Airport Sponsor to begin building the facilities shown on the conditionally approved ALP.

The portions of the ALP depicting the Long-Term AIP would be considered by the FAA for unconditional ALP approval only when the number of aircraft operations at PBI A returns to the levels that would cause unacceptable aircraft operational delay. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI A, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0013

26-14 **Comment**

It is not permissible to conduct an EIS in 2011 to support an expansion in 2030. The number of lawsuits against the County and FAA will enormous based upon this flawed premise.

Response

The FAA is not granting unconditional ALP approval to the Long-Term AIP (which would permit construction to begin) in this ROD. When operational levels resulting in unacceptable levels of delay again occur, the FAA anticipates that the Airport Sponsor will request unconditional ALP approval of the Long-Term AIP. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBI A, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0013

26-15 **Comment**

At what point does an EIS become "stale" or expire? How much of the data contained in an EIS must change before it is deemed inaccurate. Based on the way this current FEIS is written, apparently 20 years is acceptable.

Response

As detailed in FAA Order 5050.4B, Section 1401.c., the FAA considers a final EIS valid for 3 years from the date the FAA approving official signed the FEIS' Notice of Availability. For staged projects, or projects requiring successive Federal approvals, the FAA must, at a minimum, prepare a written re-evaluation if more than 3 years elapse after the date of a final EIS. The re-evaluation would focus on the document's continued adequacy, accuracy, and validity. If needed, the FAA must at a minimum prepare a supplement document for those parts of the final EIS that no longer provide acceptable or accurate information.

Letter Codes

FP0013

26-16 **Comment**

Trying to create an "economic engine" in an age when we are short of funds is inexcusable. How can you justify your actions? Putting money toward this unnecessarily proved project is putting us in further debt. That "us", meaning US, is the entire nation. When many communities do these pork barrel projects, it costs us all.

Stop the madness. Please, if you have to spend allotted money, use it where it can do some good, not in a bogus attempt to dupe honest, tax-paying citizens.

Response

See response to Comment 1-1

Letter Codes

FP0015 FP0016

26-17 **Comment**

Please, if you have to spend allotted money, use it where it can do some good, not in a bogus attempt to dupe honest, tax-paying citizens.

Response

See response to Comment 1-1.

Letter Codes

FP0016

26-18 **Comment**

In this time of budget crunching, layoffs and cutting services this is definitely not the time to be considering spending millions of dollars for airport expansion.

Thank you for speaking up for us taxpayers and killing this unnecessary airport expansion project.

Response

See response to Comment 1-1.

Letter Codes

FP0023

26-19 **Comment**

The idea that this would improve is a farce.

Response

When the Airport Sponsor approached the FAA in 2006 with a request to unconditionally approve airport capacity improvements, the FAA reviewed the Airport Sponsor's data, studies, and assertions that the airport was experiencing unacceptable levels of aircraft delay. The FAA conducted its own analyses and discussions with the PBIA ATCT that indicated that the airport was experiencing delay.

Total aircraft operations have been decreasing at PBIA for an extended period; however, operations by air carrier and air taxi aircraft have been increasing for many years. These categories include all passenger flights operating at the airport. In 1980, the number of air carrier operations was 50,947. By 2009, this number had increased to 59,140. Likewise, in 1980, the number of air taxi operations was 2,263. By 2009, this number increased to 35,947. Operations by general aviation aircraft and military aircraft have been decreasing for many years due to a combination of national and local factors. Local factors include the efforts by the Airport Sponsor to develop its three general aviation airports to attract small aircraft activity and serve as a reliever to PBIA.

Subsequent to the publication of the DEIS in 2008, the actual and forecast activity levels at PBIA have substantially declined in response to the downturn in the national economy. While the FAA's 2009 and 2010 Terminal Area Forecasts predict a modest but steady increase in aircraft activity, it is not yet clear precisely when PBIA can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay, such as those that previously existed and were anticipated to worsen. When this return to operational levels resulting in unacceptable levels of delay occurs, the FAA anticipates that the Airport Sponsor will request unconditional ALP approval of the Long-Term AIP. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal

actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0024

26-20 **Comment**

The data, analysis, and conclusions in the FEIS are so deeply flawed that the FEIS cannot be used, now or ever, as a basis for any FAA action. If and when there is any valid basis for the County to reconsider an Airport expansion plan, the FEIS process should begin anew, with a competent consultant who is objective, and not overly influenced by the County.

Response

The FEIS discloses potential environmental impacts relative to the levels of aircraft activity at PBIA that previously resulted in unacceptable levels of operational delay at PBIA and which formed the basis of the Purpose and Need, or justification, for the Airport Sponsor's proposed overall AIP. In fact, aircraft activity levels, not the calendar year, dictate the nature of the environmental consequences associated with the various alternatives under consideration in this FEIS.

Under typical circumstances, the FAA would disclose in its EIS both the nature and timing of the anticipated environmental consequences. As previously indicated, however, the FAA cannot predict the exact future point in time when aircraft operations at PBIA may reach levels that again justify the need for the expanded Runway 10R/28L. However, this does not impair the FAA's ability to disclose the potential environmental impacts and consequences that are associated with the levels of aircraft operations that were previously experienced at PBIA and which would be anticipated to occur in the future when the proposed improvements were justified and implemented. Therefore, the FAA presented in the FEIS a description of the environmental consequences that would occur at the identified operational levels based on the best information available at the time of the preparation and release of this document.

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Also, see responses to Comments 26-35 and 26-2.

Letter Codes

FP0040

26-21 **Comment**

Also I have a big concern about the CONFLICT of INTEREST of the F. A. A and U. R. S. Four years ago hired Mr.Nagy from U. R .S to conduct the Environmental Impact Study on behalf of P.B.I.A, for that period he was the leading consultant conducting the E .I .S. and meeting with the concerned residents of Palm Beach County. Now as of January of 2011, right before the release of the E.I.S, Mr Nagy left U. R. S to become an Environmental Consultant for the F. A. A Regional Office in Orlando Florida. He will be reviewing, analyzing the public comments from the public on his work and then making recommendations to the outcome of the E. I. S for Expansion plan. Is that not a conflict of interest? Is he going to be impartial / partial on his findings on the public comments? It does not look good, it does not smell good, It is not right? Any one watching this?

Response

Please see response to Comment 26-2.

Letter Codes

FP0028

26-22 **Comment**

FAA URS are asking for something with no precedence, they are putting the project on hold for now. Yet they want to use the EIS later on when they decide to proceed. This is not acceptable, air, noise, all environmental issues change constantly. If an expansion is needed because air traffic has increased, then a new full blown E I S should be conducted again.

Response

See response to Comment 26-14.

Letter Codes

FP0028

26-23 **Comment**

Government Spending! a huge unnecessary expenditure by the time that this project is finished. Just like the infamous I-95 Pbia interconnect to nowhere that no one uses. HUNDREDS OF MILLIONS OVER BUDGET ! and for What? The fleecing of Florida, Palm Beach County and DOT.

Are we ever going to learn from our past, The Country, The State, The City everyone is in financial distress, yet we want to waste almost a billion dollars by the time that is completed for a couple of hundred feet of pavement.

STOP THE MADNESS, NO!!!!!! TO PBIA EXPANSION

Response

The FAA acknowledges the Commenter's request to deny the Airport Sponsor's proposed AIP. Please see response to Comment 1-1. In regard to the use of public funds and the cost/benefit analysis for the proposed improvements, see response to Comment 26-11.

Letter Codes

FP0028

26-24 **Comment**

As a taxpayer and a person who lives and works in West Palm Beach, I have concerns about spending tax dollars on an unneeded project which would be detrimental to the surrounding homes and businesses.

Response

See response to Comments 1-1 and 1-28.

Letter Codes

FP0030

26-25 **Comment**

These studies should be done using impartial people, not people like Allan Nagy who was a consultant on the EIS project and has now been hired by the FAA to work on the PBIA situation.

Response

The FAA conducted an impartial, unbiased analysis of the need for the AIP, its alternatives, and potential environmental impacts. In regard to Mr. Allan Nagy joining the FAA, please see response to Comment 26-2.

Letter Codes

FP0031

26-26 **Comment**

The bottom line is that there is no need for any expansion now or for many years to come.

Response

See response to Comment 1-1.

Letter Codes

FP0031

- 26-27 **Comment**
I urge you to reject any expansion of PBIA. Palm beach county taxpayers cannot afford any more support for a boutique airport that does nothing to serve them. It is continually the highest priced airport in the area in terms of fares and parking.
Response
See response to Comments 1-1 and 1-28.
Letter Codes
FP0032
- 26-28 **Comment**
It is my understanding that a conditional approval has never been granted by the FAA as it is being granted to the PBIA expansion. Under what authority does the FAA have the ability to grant a conditional approval?
Response
Please see response to Comment 26-13.
Letter Codes
FP0035
- 26-29 **Comment**
How can an approval be granted in the future without requiring a new environmental impact study and not taking into account changed conditions mat both the airport and to the surrounding areas?
Response
The FAA does not intend to grant an ALP approval to the Long-Term AIP in the future without first taking into account changed conditions that may have occurred in the interim. Please see Sections 12.0 and 13.0 of the ROD regarding future environmental review and documentation.
Letter Codes
FP0035
- 26-30 **Comment**
The FEIS is 3,000 pages long. This morass of paper tries to hide the fact that there is no real basis for the airport expansion project which included a new runway. Its "analysis" is biased, incomplete, misleading, and unreliable. The FEIS ignores the multitude of problems with the new runway, and the environmental problems it would cause. The FEIS is a deeply embarrassing performance, which has already wasted millions of dollars of public funds. The consultant who did it should be fired.
Response
The size of the FEIS cited by the Commenter includes technical appendices and supporting documentation. The FAA disagrees that the FEIS is "biased, incomplete, misleading, and unreliable." The FEIS provides a comprehensive discussion and analysis of the purpose of the AIP, alternatives to the AIP, and potential environmental impacts. It also addresses the effect on airport operational levels at PBIA resulting from the unanticipated economic downturn that occurred subsequent to publication of the DEIS but prior to publication of the FEIS.
Letter Codes
FP0039
- 26-31 **Comment**
The 2008 FEIS for a runway at Ft. Lauderdale provides a startling contrast. It was done competently and objectively by a different consultant than the FEIS for PBIA. It represents the type of analysis that should have been conducted here, but was not.
Response
The FAA and its consultant team for the Palm Beach EIS have fully complied with the NEPA process, FAA Orders 5050.4B and 1050.1E, as well as applicable Federal, state, and local laws to produce a technically competent, fair, and unbiased document
Letter Codes
FP0039

- 26-32 **Comment**
This Airport expansion plan is not necessary. No one is in favor of it except the County. It is a fraud concocted by the Airport Director.
Response
See response to Comments 1-1 and 26-19
Letter Codes
FP0039
- 26-33 **Comment**
I urge you to fulfill your fiduciary responsibilities to the citizens of this County and reject the Plan for a new runway. The federal government is running incredibly huge deficits, and should not waste may hundreds of millions of dollars on a totally unnecessary project at Palm Beach Airport.
Response
See response to Comment 1-1.
Letter Codes
FP0039
- 26-34 **Comment**
The Plan should not be approved in any way, conditional or otherwise.
Response
The FAA acknowledges the Commenter's request to reject, in its entirety, the Airport Sponsor's proposed AIP and that the FAA should deny any approval, conditional or otherwise.
Letter Codes
FP0039
- 26-35 **Comment**
The FEIS should never be used for any reason because its data and methodology are unreliable, biased, incomplete, and deceptive.
Response
The FAA disagrees that the FEIS data and methodology are "unreliable, biased, incomplete, and deceptive." The FEIS provides a comprehensive discussion and analysis of the purpose of the AIP, alternatives to the AIP, and potential environmental impacts. The FAA and its consultant team for the Palm Beach EIS have fully complied with the NEPA process, FAA Orders 5050.4B and 1050.1E, as well as applicable Federal, state, and local laws to produce a technically competent, fair, and unbiased document.
Letter Codes
FP0040
- 26-36 **Comment**
The County's proposed Long-Term Airfield Improvement Project should be rejected by the FAA in its entirety, and the FAA should deny any approval, conditional or otherwise, of the Long-Term AIP.
Response
The FAA acknowledges the Commenter's request to reject, in its entirety, the County's proposed Long-Term AIP and that the FAA should deny any approval, conditional or otherwise of the Long-Term AIP. Please see response to Comment 1-1.
Letter Codes
FP0040
- 26-37 **Comment**
We are not aware of the FAA ever granting a conditional approval where the condition to be fulfilled is the need for the project in the first place. It would be illogical to do so.
Response
According to FAA Order 5050.4B, paragraph 202.c.(1), conditional ALP approval indicates that:

a) [t]he proposed ALP depicts features that are safe and efficient for airport operations and airport use.
(b) ARP has not yet completed its review of the environmental impacts the features depicted on the

ALP would cause. ARP has not done so because the features are not yet needed or are not ripe for decision. or

(c) [t]he approving FAA official has not authorized the airport sponsor or project proponent to begin building the facilities shown on the conditionally approved ALP. The sponsor or proponent may start building those facilities only after the ARP completes its environmental analysis of those facilities and the approving FAA official issues an unconditional ALP approval of the ALP depicting those facilities. (Emphasis in original.)

In terms of the proposed Long-Term AIP, the FAA's review of the 2001 ALP indicates that the proposed project is safe and efficient. In addition, environmental review of the Long-Term AIP is contained in both the 2008 DEIS and the 2011 FEIS for PBIA. However, during the preparation of the FEIS, it became clear that the Runway 10R/28L airfield capacity enhancement project would not be needed within the time frame anticipated in the 2008 DEIS (the year 2013). Therefore, in keeping with FAA Order 5050.4B, the Long-Term components of the AIP are "not yet needed or . . . not ripe for decision" at this time. For this reason, the FAA is not providing the Airport Sponsor approval to implement the Long-Term AIP. Thus, under both paragraph 202.c.(1)(b) and 202.c.(1)(c), the FAA finds conditional ALP approval to be appropriate.

The portions of the ALP depicting the Long-Term AIP would be considered by the FAA for unconditional ALP approval only when the number of aircraft operations at PBIA returns to the levels that would cause unacceptable aircraft operational delay. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0040

26-38 **Comment**

FAA can only approve a plan if "the project will be completed without unnecessary delay." 49 U.S.C. § 47106(a)(4). It is impossible for the FEIS to meet this requirement because the project may never begin at all.

Response

The referenced section of U.S. Code involves project grant application approvals. The only requested Federal actions that involve project grant applications is the request for unconditional ALP approval of the Near-Term AIP and to allow processing of grant applications associated with the Near-Term AIP. The Long-Term AIP, which appears to be the subject of the comment, does not involve a request for Federal action to process project grant applications.

As detailed in FAA Order 5050.4B, Section 1401.c., the FAA considers a final EIS valid for 3 years from the date the FAA approving official signed the FEIS' Notice of Availability. For staged projects, or project requiring successive Federal approvals, the FAA must prepare a written re-evaluation if more than 3 years elapse between the date of a final EIS and one of those stages. The re-evaluation would focus on the document's continued adequacy, accuracy, and validity. If needed, the FAA must, at a minimum, prepare a supplement document for those parts of the final EIS that no longer provide acceptable or accurate information.

Letter Codes

FP0040

26-39 **Comment**

An airport cannot seek FAA approval for a new airport layout plan, begin an environmental impact study, and then midway through the process, ask for it to be made conditional when it runs into problems such as drastically changed projections. See DOT Order 5050.4B, section 202.c.(4) To the contrary, FAA policy allows for approval midstream only of truly independent projects only if they are subject of certain types of federal funding, neither of which exists here.

Response

The comment appears to misapprehend the requirements of FAA Order 5050.4B, Section 202.c.(4). That provision applies, by its very terms, to conditional ALP approvals granted *during the active preparation of a NEPA document* where the conditionally approved facilities are the very subject of the NEPA review. The actual language of FAA Order 5050.4B, Section 202.c(4) states that “The approving FAA official may not conditionally approve an ALP depicting a new airport, a new runway, or a major runway extension if any of those projects and their associated actions are the subjects of an EA or EIS that is being prepared. In these instances, the approving FAA official may unconditionally approve an ALP depicting those facilities and their connected actions, but only if FAA has issued a FONSI or ROD that is based on an EA or EIS that addresses those airport actions.” This guidance simply instructs the FAA official to withhold approval of changes to an ALP that are the subject of an ongoing EA or EIS until issuance of a FONSI or ROD. This limitation is intended to avoid the appearance that the FAA is making decisions on proposed projects before it completes the required NEPA processes for those actions (see FAA Order 5050.4B, Preamble, page 11, paragraph d).

The purpose of the FEIS was to evaluate portions of the ALP for which the Airport Sponsor is seeking unconditional ALP approval (Near-Term AIP) and, due to the effects of the economic recession, conditional ALP approval of the Long-Term AIP. The FAA did not grant any ALP approvals (conditional or unconditional) for projects being evaluated in the EIS during the EIS’s preparation. Instead, the FAA has rendered a decision on the portions of the ALP that depict the Near-Term AIP and Long-Term AIP in this Record of Decision, and having issued the ROD, the appropriate ALP approvals for the various project components can now be granted. This approach is consistent with the referenced FAA Order. To be clear, in keeping with the referenced section of FAA Order 5050.4B, the FAA has not granted any project approval (either conditional or unconditional) during the pendency of the this EIS review. The approvals being granted have been withheld until the current time – the issuance of a ROD following completion of an EIS. This is precisely in keeping with the language and intent of Paragraph 202.c.(4) of FAA Order 5050.4B. Finally, it should be noted that conditional ALP approvals are permissibly granted by the FAA even in the absence of a NEPA review. See FAA Order 5050.4B, Section 202.c.(1). The purpose of these conditional ALP approvals is to provide the FAA with an avenue to examine the location, dimensions, and other design elements of the proposed improvements to ensure that FAA’s design, safety, and efficiency criteria would not be prohibitive of the proposed project, particularly where the ripeness for decision and implementation of the proposed project may be some time in the future. This typically occurs at a point in time in advance of NEPA review, when the facilities may not yet be needed based on existing and forecast operational levels.

Letter Codes

FP0040

26-40 **Comment**

If a supportable and provable real need for a second runway ever arises, the County should then submit a new project plan and a new EIS should be conducted, objectively and competently, analyzing all then current and forecast economic, market, demographic, environmental, and land use realities and constraints that simply cannot be known, let alone analyzed, today.

Response

See response to Comments 1-1 and 1-2, and Sections 12.0 and 13.0 of the ROD regarding future environmental reviews associated with a request by the Airport Sponsor for unconditional ALP approval of capacity enhancements at PBIA.

Letter Codes

FP0040

- 26-41 **Comment**
By essentially eliminating the Diagonal Runway for use by jets, the proposed new east/west runway will necessarily increase the east/west flow of air traffic. The FEIS utterly fails to analyze the effects of the increase in noise and air-to-ground pollution over the affected area under the east/west flight path.
Response
See response to Comments 3-14 and 5-8.
Letter Codes
FP0040
- 26-42 **Comment**
FAA may approve runway expansion "only" if it is "satisfied that . . . enough money is available to pay the project costs that will not be paid by the United States Government under this subchapter." 49 U.S.C. § 47106(a)(3). The FEIS utterly fails to meet this requirement because it does not contain a sufficient analysis as to how the County intends to meet the financing requirements for the \$370 Million expansion plan.

There are no Joint Project [Planning] Agreements or any other agreements in place with the State of Florida (i.e., the Florida Department of Transportation) for financing the expansion project. Given the current economic conditions and highly-publicized fiscal problems and budgets cuts of state and local governments, it is unlikely that the State of Florida will ever be able to justify such an astronomical expenditure to the public.
Response
The referenced section of U.S. Code involves project grant application approvals. In a grant application, the Airport Sponsor provides the FAA with assurances that the non-Federal share of an Airport Improvement Program grant will be available to complete the project. In response to the "FEIS fails to meet this requirement," the FAA notes that the only requested Federal action that involve project grant applications is the request to grant unconditional ALP approval to the Near-Term AIP and to allow processing of grant applications associated with the Near-Term AIP. The Long-Term AIP, which is the subject of the comment, does not involve a request for Federal action to process project grant applications.

In regard to the cost\benefit of the proposed Long-Term AIP, see the response to Comment 26-11.
Letter Codes
FP0040
- 26-43 **Comment**
The FEIS is also completely devoid of any analysis of whether the Federal government will absorb the costs of a project to address a problem that admittedly does not exist. This is particularly the case in an era when federal and state governments are focused on identifying and eliminate pork barrel projects.
Response
See response to Comments 1-1 and 1-2 regarding approvals being granted in the ROD. With respect to the Long-Term AIP, unconditional ALP approval (which allows the Airport Sponsor to proceed with implementation of the project) is not being granted in this ROD. However, if conditions again warrant consideration of unconditional ALP approval for capacity enhancements at PBIA, construction cost will likely be funded with a combination of Passenger Facility Charge (PFC) collections, Federal and local grants, and local funds. PFCs are imposed at PBIA today and the collection period would be modified to cover the cost of the proposed runway project. Other funding sources may include FAA Airport Improvement Program grants and grants from the Florida Department of Transportation. If a runway capacity enhancement project is eventually approved, the FAA will require that a Cost/Benefit Analysis be conducted prior to granting approval to use PFC funds and/or issue Federal grants. The cost/benefit study would also consider the No-Action Alternative and the cost incurred by delays at PBIA.
Letter Codes
FP0040

26-44 **Comment**

The County intends to raise about \$100 million for this project from ticket charges made to airline passengers, even though it is private jets that create any congestion problem.

Response

The FAA notes that delay should be addressed for all users of public airports, not only commercial air carriers. For further information on funding, see response to Comment 26-43.

Letter Codes

FP0040

26-45 **Comment**

FEIS attempts to justify this huge public expenditure by comparing it to several proposed alternatives, one of which would involve tearing down most of the airline terminal, estimated to cost \$1.8 billion or more. However, superficially comparing a \$370 million project to address a nonexistent problem with other exorbitantly priced, but equally non-realistic alternatives (which are obviously concocted as straw men try to prove how reasonable the Plan is), does not meet any fiscally responsible criteria for evaluating the costs versus the benefits of the expansion plan.

Response

The unconditional ALP approval sought at this time by the Airport Sponsor does not include improvements to Runway 9R/27L; therefore, no public money would be spent on the Long-Term AIP until capacity enhancements are again needed again at PBIA, subject to additional environmental documentation, and unconditional ALP approval by the FAA. For a discussion of the need to perform a cost/benefit study, please see the response to Comment 26-11.

The proposed AIP was developed during the Airport Sponsor's Master Plan process, which evaluated numerous alternatives. The result of the planning process identified the AIP as the Airport Sponsor's preferred alternative based on the benefits of the project, minimal airport disruption, and comparatively lower cost than other alternatives. For the EIS, the FAA conducted an independent review of the Master Plan alternatives and identified other alternatives. In most cases, runway development alternatives considered at PBIA would involve realignment of major road thoroughfares and the acquisition and displacement of large areas of commercial and industrial land use. These factors contributed heavily to the projected development costs of several alternatives.

Based on the 2009 TAF, the Airport Sponsor determined that the proposed Runway 10R/28L expansion project would not be needed as soon as previously thought. Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0040

26-46 **Comment**

No rational and objective analysis could justify spending hundreds of millions of dollars to achieve little or no benefit based on entirely theoretical projections.

Response

See response to Comments 1-1, 1-2, 26-11, and 26-19.

Letter Codes

FP0040

26-47 **Comment**

The expansion plan is not an environmentally sustainable program. The FEIS gives only minor consideration of the construction affects [sic] of the Near-Term and Long Term Plans, while ignoring the ecological impacts of all aspects of the expansion plan. The FEIS does not reflect the level of environmental stewardship demanded in the current economic and ecological climate; it violates sustainability principles.

Response

The FEIS provided a comprehensive evaluation of construction-related impacts of the Near-Term and Long-Term components of the AIP and Alternative 2 (see Section 5.5 of the FEIS). The FEIS also considers fully ecological impacts of the proposed overall AIP and Alternative 2. The FEIS contains detailed analyses of impacts to Fish, Wildlife, and Plants (Section 5.7); Floodplains (Section 5.8); Wetlands (Section 5.16); and Water Quality (Section 5.15). The FAA disagrees that the project violates sustainability principles. Although not required to do so by the FAA, the Airport Sponsor may incorporate sustainable design elements into the plans for the AIP. These elements may include, but not be limited to, energy efficient buildings, maximizing recycling, and low-energy LED lighting.

Letter Codes

FP0040

26-48 **Comment**

The FEIS fails to address why two perfectly usable, developed FBOs should be demolished, relocated, and then rebuilt from new materials in order to permit the Long-Term expansion project to proceed. It is a waste of resources, public and private, to destroy viable FBO hangars, taxiways and ramp spaces and move them to a new location to accommodate a parallel runway which will not adequately address the potential future delays in air traffic at PBIA.

Response

The need to remove and relocate hangars in the southeast quadrant of the airfield is explained in Footnote #9 on page 1-23 of the FEIS. The note explains that to comply with airfield design standards and FAA Runway Protection Zone land use compatibility guidelines, the Long-Term AIP would require the relocation of FBO and general aviation support facilities that may still be located in the southeast quadrant of the airport. These mandatory relocations would become necessary if capacity enhancements are again justified, receive unconditional ALP approval, and are implemented by the Airport Sponsor. The relocation of FBO and general aviation facilities would not be required for development of the Near-Term AIP; however, voluntary FBO relocations, including all or part of their respective operations, may be undertaken by FBOs to meet customer demands prior to the runway improvements becoming ripe for decision. Section 5.5.4 of the FEIS discusses solid waste generated during construction. It notes that demolition and construction wastes would be generated and that, subject to design parameters and product specifications, that some materials could be re-used or recycled. Specific quantities of construction wastes have not been estimated because project design plans have not been prepared. However, metal FBO buildings, concrete aprons, and airfield pavements are largely recyclable. In addition, although not required to do so by the FAA, the Airport Sponsor may incorporate sustainable design elements into the plans for the AIP. These elements may include, but not be limited to, energy efficient buildings, maximizing recycling, and low-energy LED lighting.

Letter Codes

FP0040

26-49 **Comment**

The expansion plan is not a "Green" project, and should be rejected.

Response

See response to Comments 26-47 and 26-48.

Letter Codes

FP0040

- 26-50 **Comment**
The Plan should be disapproved.
Response
The FAA acknowledges the Commenter's request that the FAA not approve the Airport Sponsor's proposed AIP.
Letter Codes
FP0040
- 26-51 **Comment**
The Military Trail property acquisition component of the Short-Term Project should be disapproved.
Response
Land acquisition by airport sponsors is often required to enable an airport expand to meet capacity needs, improve the quality of aviation services provided, and/or mitigate noise impacts through implementation of zoning and land use controls. On AIP-assisted projects, the sponsor must acquire real property rights of a nature and extent adequate for the construction, operation, and maintenance of the grant-assisted project. The FAA Advisory Circular Land Acquisition and Relocation Assistance for Airport Improvement Program Assisted Projects (AC 150/5100-17) provides procedural guidance to airport sponsors to help them carry out their acquisition and relocation programs in conformance to the Uniform Act and the implementing regulations (49 CFR part 24). An AIP-assisted airport project or program cannot proceed or receive FAA approval until the airport sponsor provides assurance of conformance to the Uniform Act. The Uniform Act prescribes procedures to ensure fair and consistent acquisition of real property for Federal programs and provides additional benefits and entitlements for persons who are displaced due to the acquisition of their owned or leased occupied property for an AIP-assisted project.
- The Airport Sponsor at PBIA has articulated a near-term objective for land acquisition on the east side of Military Trail that does not rely for its justification on the proposed Runway 10R/28L expansion project and such acquisition would, therefore, be justified for approval at this time. The Airport Sponsor's objective is to acquire sufficient interest in adjacent properties between Military Trail and the existing west airport property line to better secure and define the airport's boundary and/or convert the land to aeronautical use, including revenue-generating use. The FAA acknowledges that several parcels of property located near the Military Trail and Southern Boulevard interchange would need to be acquired for the proposed Runway 10R/27L Runway Protection Zone if the Long-Term AIP was implemented. However, these properties could be acquired to meet the Airport Sponsor's near-term objectives, regardless of the implementation of the Long-Term AIP. Therefore, the FAA concluded that the acquisition of these parcels in particular do not depend on the Long-Term AIP for its justification.
Letter Codes
FP0040
- 26-52 **Comment**
FAA's conditional approval is not appropriate at this point in time. Because of the high degree of uncertainty related to the need for the AIP, it is not appropriate for the FAA to issue a conditional approval for the AIP at this time. Any need for such improvements is decades away.
Response
See response to Comment 26-13.
Letter Codes
FP0041
- 26-53 **Comment**
FAA should require a new EIS that is contemporaneous with an actual need for this project at a time when a full range of updated and accurate data is available that will allow the FAA to provide a comprehensive and rational review of this project. Based on the FAA's own forecasts, it may well be more than two decades before this assessment would be needed.
Response
See Sections 12.0 and 13.0 of the ROD regarding future environmental review of a request by the Airport Sponsor for unconditional ALP approval of capacity enhancements at PBIA.

Letter Codes

FP0041

26-54 **Comment**

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 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.

Response

Comment noted. The FAA also encourages airport sponsors across the U.S. to become more environmentally sustainable. This comment has been forwarded to the Palm Beach County Department of Airports for their consideration.

Letter Codes

FS0001

26-55 **Comment**

Is this a conflict of interest for the [sic] you since you were responsible for EIS while working for the URS and now you are analyzing your findings as an FAA employee?

Response

Please see response to Comment 26-2.

Letter Codes

FP0042

26-56 **Comment**

The EIS does not adequately address the issue of "appropriate" NEPA assessment which the FAA might consider in the future for the long term (runway) component of the plan. It does not appear that the treatment of the project as separate components, short term and long term, and how the FAA should approach in NEPA responsibilities in that regard, has been included as part of the scoping process in the development of the EIS or as an issue to be evaluated in the EIS.

Response

Appendix J of the FEIS documents the EIS Scoping process that took place in early 2007 for the overall AIP. Scoping did not include separate discussions of the Near-Term and Long-Term components of the AIP because the economic recession that started in late 2008 was not anticipated during the EIS Scoping process. The effects of the economic recession and the Airport Sponsor's subsequent request for a mixed ALP approval of the AIP are discussed in Sections 1.1.2, 2.1, and 3.1 of the FEIS and Sections 1.2 and 2.4 of the ROD.

The unanticipated economic events, which affected the level of aviation activity at PBIA and across the nation, resulted in the Airport Sponsor requesting unconditional ALP approval of the Near-Term AIP, which has independent utility from the overall AIP. The airfield capacity enhancement component of the AIP (new runway) was determined to not be needed at this time and only conditional ALP approval was requested by the Airport Sponsor.

Upon receipt of the Airport Sponsor's request for unconditional ALP approval of an airfield capacity enhancement project at PBIA, the FAA will determine if the Airport Sponsor's request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project.

The precise scope, content, and format of future environmental documentation that will be necessary to comply with NEPA cannot be determined at this time. The FAA's future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.

Letter Codes

FP0044

26-57 **Comment**

The EIS does not address in manner in which the proposed treatment of the Sponsor's plan will be harmonized with the guidelines in Document No. 5050.48 on supplementing an EIS or how the bifurcated treatment of the Sponsor's project, given the lack of need as to the long term plan, as set forth in the EIS, is authorized under No. 5050.4B or any other law or regulation.

Response

See the ROD at Sections 3.2.1, 3.2.2, and 3.2.3 regarding the appropriateness of granting a mixed ALP approval under the current circumstances.

Letter Codes

FP0044

26-58 **Comment**

Signature Flight Support Corporation ("Signature") is a fixed base operator located on the southeastern part of PBI. Signature serves a significant portion of the General Aviation ("GA") traffic, which constitutes approximately 65% of the GA operations at PBI.

Signature supports and has no objection to the Near-Term Airport Improvement Plan project relating to development of future GA facilities in the northwest quadrant of PBI.

Signature agrees with the FAA that the proposed expansion and relocation of Runway 10R/28L is premature at this time.

Response

The Commenter's "no objection to the Near-Term AIP Project" is noted. The FAA acknowledges the Commenter's statement, "the proposed expansion and relocation of Runway 10R/28L is premature at this time."

Letter Codes

FP0047

26-59 **Comment**

Mr. Pelly asked the FAA to conditionally approve this FEIS, so that the Plan can be activated and promptly implemented whenever the County's future projections of Airport operations allegedly forecast significant delays.

Response

See response to Comment 1-41.

Letter Codes

FP0040

26-60 **Comment**

Having worked in the financial industry for over 38 years and constantly having to use correct, accurate facts and figures to reach many strategic and important decisions, I strongly feel the same should be done concerning the business actions and proposals for Palm Beach International Airport and all of its operations/ runway/building request matters here in Palm Beach County.

Response

See response to Comments 1-8 and 1-9.

Letter Codes

FP0048

- 26-61 **Comment**
Being a property owner for over 36 years in the Historic El Cid Neighborhood here in West Palm Beach we have of course followed the operations at PBI A over the years and I find that a lot of “so called justifications” have come about the unrealistic and over inflated guess-estimates in the figures column.
Response
When the Airport Sponsor approached the FAA in 2006 with a request to unconditionally approve airport capacity improvements, the FAA reviewed the Airport Sponsor’s data, studies, and assertions that the airport was experiencing unacceptable levels of aircraft delay. The FAA conducted its own analyses and discussions with the PBI A ATCT that indicated that the airport was experiencing delay.

Subsequent to the publication of the DEIS in 2008, the actual and forecast activity levels at PBI A have substantially declined in response to the downturn in the national economy. While the FAA’s 2009 and 2010 Terminal Area Forecasts predict a modest but steady increase in aircraft activity, it is not yet clear precisely when PBI A can again be expected to experience operational levels which result in unacceptable levels of aircraft operational delay, such as those that previously existed and were anticipated to worsen. When this return to operational levels resulting in unacceptable levels of delay occurs, the FAA anticipates that the Airport Sponsor will request unconditional ALP approval of the Long-Term AIP. Upon receipt of the Airport Sponsor’s request for unconditional ALP approval of an airfield capacity enhancement project at PBI A, the FAA will determine if the Airport Sponsor’s request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA’s future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.
Letter Codes
FP0048
- 26-62 **Comment**
I believe the FAA has a prudent job of using simple common sense – normal guide lines to see when a project is sincerely needed and when it is clearly NOT NEEDED!! There should be total accountability on the Department of Airport.
Response
See response to Comments 1-1, 1-28, and 1-33.
Letter Codes
FP0048
- 26-63 **Not Used**
- 26-64 **Comment**
Be realistic, and forthright in your assessments of proposed projects at any Airport making decisions on realistic facts and figures and NOT PIE IN THE SKY fake projections; as the figures and the paper trail simply speak for themselves in this case, especially when you realize we are talking about HUNDREDS OF MILLIONS OF DOLLARS THAT ARE AT STAKE HERE!!
Response
See response to Comments 1-8, 1-9, 1-28, and 1-33.
Letter Codes
FP0048
- 26-65 **Comment**
I obviously am against this boondoggle airport runway and building project proposal as it simply is a total waste of funds in this day and time of economic instability, and over these many years it should be noted that I have flown in and out of PBI A on many numerous occasions and know personally of absolutely NO justification for this proposal, believe me I would have picked up on Any need, there just IS NOT ONE!!!

Response

Please see response to Comments 1-1, 1-8, and 1-9.

Letter Codes

FP0048

26-66 **Comment**

I am opposed to granting any type of conditional approval for this baseless request.

Response

Comment opposed to granting any type of conditional approval for expansion of PBIA is noted.

Letter Codes

FP0048

26-67 **Comment**

I strongly disagree with the expansion.

Response

Comment against proposed expansion at PBIA is noted.

Letter Codes

FP0049

26-68 **Comment**

The evaluation is unsound, misleading, and a travesty to the FAA and the EIS process.

Response

See response to Comments 1-1 and 26-20.

Letter Codes

FP0049

26-69 **Comment**

NO EXPANSION!!!

Response

Comment against proposed expansion at PBIA is noted.

Letter Codes

FP0049

26-70 **Comment**

Ecology – saving the planet yet runways are planned for private aircraft that carry few people – ratio of people to fuel is ridiculous.

Response

See response to Comments 26-47 and 26-48.

Letter Codes

FP0050

26-71 **Comment**

I object to the expansion of Palm Beach International Airport runways.

Response

Comment in opposition to expansion of PBIA is noted.

Letter Codes

FP0051

26-72 **Comment**

There are numerous other infrastructure needs in Florida, the country, and Palm Beach County. Certainly these planned millions can be spent more wisely.

Response

See response to Commentw 25-1 and 1-33.

Letter Codes

FP0051

- 26-73 **Comment**
The use of “out-dated” and “stale” EIS’s is an operation that is futile and a waste of taxpayer money.
Response
See response to Comment 26-15 regarding the length of time the FAA considers a final EIS to be valid. The ROD being issued at this time does not provide a final decision or approve the use of any funds for implementation of capacity enhancements at PBI. In addition, airport improvement projects are typically funded through airport user fees and revenues. Generally, taxpayer funds are not utilized for airport development projects.
Letter Codes
FP0052
- 26-74 **Comment**
As a property owner for 25 years in the Historic Prospect Park/Southland Park District here in West Palm Beach, I am writing to you to express my extreme opposition to any conditional or any approval for a completely UN-NECESSARY Runway Addition at the Palm Beach County, Palm Beach International Airport.
Response
Comment in opposition to expansion is noted. The FAA agrees that there is no current need at PBI for the proposed capacity enhancements, and for that reason has decided to grant only conditional ALP approval of the Long-Term AIP at this time.
Letter Codes
FP0053
- 26-75 **Comment**
The FAA has a clear and concise responsibility to respond to clearly ‘far-out’ proposal by the Department of Airport herein Palm Beach County and to rein in the fictitious appeals and ridiculous proposals by Officials who just want to build and spend without displaying any REAL JUSTIFICATION! OR NEED!
Response
Only the Near-Term AIP is being granted unconditional ALP approval in this ROD. The Near-Term AIP includes several independent utility projects that may be implemented by the Airport Sponsor by 2015. The apparent request that the FAA deny approval of the overall AIP, are noted. See response to Comment 1-1 regarding the status of the Long-Term AIP.
Letter Codes
FP0053
- 26-76 **Comment**
As a person who believes that governmental agencies, as well as our own households should be accountable for budgetary and responsible spending. “whims” like this RUNWAY PROJECT should not be rubber stamped, The Palm Beach Post Newspaper brought forth very clear, concise reasons as to why this RUNWAY should NOT OCCUR and I CONCUR! Do the right thing!!
Response
The FAA is not granting unconditional ALP approval to the Long-Term AIP (which includes airfield capacity enhancements) in this ROD. When operational levels resulting in unacceptable levels of delay again occur, the FAA anticipates that the Airport Sponsor will request unconditional ALP approval of airfield capacity enhancements. Upon receipt of the Airport Sponsor’s request for unconditional ALP approval of an airfield capacity enhancement project at PBI, the FAA will determine if the Airport Sponsor’s request is ripe for consideration and decision. If it is, the FAA will review the FEIS to determine its adequacy to comply with NEPA, including validation of the purpose and need for the project, the alternatives evaluation, environmental impacts, and required mitigation measures. That review will be followed by any further environmental documentation deemed necessary to support a final decision on the Federal actions associated with a request for unconditional ALP approval of an airfield capacity enhancement project. The FAA’s future environmental documentation will be circulated for public review and comment, and the FAA will issue its decision in a ROD.
Letter Codes
FP0053

Palm Beach International Airport FEIS

27. Cumulative Impacts

No comments related to cumulative impacts were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS

28. Mitigation Measures

No comments related to mitigation measures were provided by local governments, agencies, or the public that reviewed the FEIS.

Palm Beach International Airport FEIS

29. Coordination and Public Involvement

29-1 **Comment**

Many residents who speak Spanish have not been informed of this project. PLEASE DO NOT EXPAND THE AIRPORT WITHOUT INFORMING AND HAVING IN MIND ALL AFFECTED RESIDENTS.

Response

An extensive public involvement program was implemented for the EIS to ensure that information was provided to the public and government agencies. This program included outreach to Spanish speaking citizens.

Spanish language advertisements (both display ads and legal ads) were published in newspapers with local circulation for both the DEIS and the FEIS. The newspapers in which the advertisements were published included the former La Palma newspaper (no longer publishing) and the Palm Beach Post. Legal and display advertisements in both English and Spanish announcing the availability of the FEIS were published in the Palm Beach Post on January 23, 2011 and January 30, 2011.

In addition, local government officials, focus group members, community leader and representatives, and persons who attended EIS public meetings were notified of the availability of the FEIS through the newspaper advertisements, as well as through the Federal Register, direct mailing of EIS materials, the EIS project web site, and postcards. The DEIS and FEIS, both of which included Spanish translations of the EIS Executive Summaries, were also available for public review at several local libraries (Palm Beach County (PBC) Greenacres Branch; PBC Okeechobee Blvd Branch; West Palm Beach Public Library), the Palm Beach International Airport, and the FAA Orlando Airports District Office.

Letter Codes

FP0009

29-2 **Comment**

I understand the time line, the public comment period expires 3/21/11. Do you anticipate that the deadline will be extended, or is it a firm expiration date?

Response

During the FEIS comment period, FAA did not receive any substantive requests to extend the Palm Beach Airport FEIS comment period past the established date. Therefore, the FEIS comment period ended on March 21, 2011.

Letter Codes

FP0011

29-3 **Comment**

Why no public outreach surround the FEIS? Throughout the entire EIS process, there have been focus-groups, meetings, educational events to get public participation and education. The FEIS was released on 2/4/11 to the public. NO PUBLIC OUTREACH WAS CONDUCTED beyond bare minimum law requirements. Why the abrupt change? Especially given the novelty of the FEIS as written?

Response

Legal and display advertisements in both English and Spanish announcing the availability of the FEIS were published in the Palm Beach Post on January 23, 2011 and January 30, 2011. In addition, local government officials, focus group members, community leader and representatives, and persons who attended EIS public meetings were notified of the availability of the FEIS through the newspaper advertisements, as well as through the Federal Register, direct mailing of EIS materials, the EIS project web site, and postcards. The DEIS and FEIS, both of which included Spanish translations of the EIS Executive Summaries, were also available for public review at several local libraries (Palm Beach County (PBC) Greenacres Branch; PBC Okeechobee Blvd Branch; West Palm Beach Public Library), the Palm Beach International Airport, and the FAA Orlando Airports District Office.

After review and consideration of all comments submitted to the agency on the DEIS, the FAA prepared and published the FEIS. By law, the FAA cannot take any action for a period of 30 days after the publication of a Notice of Availability (NOA) of an FEIS in the Federal Register. This 30-day "hold" period on agency decision-making is required by the Council on Environmental Quality's NEPA regulations, but it does not constitute a public comment period required by law or regulation. Even though not legally obligated to do so, it is FAA's practice, to the extent practicable, to consider and in its Records of Decision (ROD) to respond to comments received during the mandated 30 day "hold" period. Due to the request for a mixed ALP approval of the AIP following publication of the DEIS, the FAA solicited comments on its FEIS during the administrative "hold" period. In addition, the FAA committed to render no decision for at least 45 days (rather than 30 days) following publication of the FEIS. Therefore, the FEIS was made available for review and comment for a period of 45 days after the NOA was published in the Federal Register, which is above and beyond any legal requirement, as no public review period is required or ordinarily offered on a Final EIS.

Letter Codes

FP0013

29-4 **Comment**

Why was it a full month later (3/9/11) that the Spanish translation was finally released? A large number of people directly impacted by the results of this FEIS are of hispanic origin. Is this vital information that will impact their homes and lives not important enough to the FAA to provide this population segment with the same amount of comment time as the English speakers being affected?

Response

The Palm Beach FEIS was distributed a week prior to the February 4, 2011 publication of the Notice of Availability in the Federal Register. A Spanish translation for the FEIS Executive Summary was made available on the same day as the English version of the FEIS. The Spanish translation of the Executive Summary was available on the project's web site, at local libraries, the Palm Beach International Airport, and the FAA Orlando Airports District Office. In addition, the Spanish translation of the FEIS Executive Summary was mailed to several local governments and other recipients of the FEIS, including Palm Beach County, City of Greenacres, City of West Palm Beach, Town of Palm Beach, Town of Glen Ridge, and the Town of Haverhill concurrent with the release of the English version of the FEIS.

The Commenter's reference to the "release" of the Spanish translation a month after the FEIS was published is incorrect. Several weeks after the publication of the FEIS, the FAA was contacted by a representative of the Vedado Neighborhood Association who requested *additional* printed copies of the Spanish translation of the FEIS Executive Summary for sharing with community members. FAA agreed to the request and provided approximately 12 printed copies of the translated Executive Summary.

As discussed in the FEIS, the Near-Term AIP would not result in disproportionately high and adverse environmental effect on minority or low income populations. With respect to the Long-Term AIP, which has been granted only conditional ALP approval in this ROD, no disproportionately high and adverse environmental effects on minority or low-income populations would occur. Although mitigation measures are not warranted for Environmental Justice reasons, mitigation measures being proposed to address other environmental categories, such as noise, would benefit and further reduce impacts to individuals qualifying as minority or below poverty under the environmental justice orders (DOT Order 5610.2 and Executive Order 12898). Section 5.14 of the FEIS describes the potential environmental justice impacts associated with the AIP and Alternative 2, when compared to the No-Action Alternative.

Letter Codes

FP0013

29-5 **Comment**

After years of public meetings, focus groups, etc. it is indeed unfortunate that neither URS nor the FAA saw the value in having a concluding public meeting to properly inform the general public and potentially affected property owners of the specific conclusions drawn and recommendations made in the FEIS. The report is not presented in layman's terms and, as such, does not make information

available in a comprehensible way to the general public.

Response

See response to Comment 29-3. The type of "concluding public meeting" requested in the comment is not an ordinary practice in NEPA processes. In addition, despite the opinion of the Commenter, the FAA made every effort to write the DEIS and FEIS such that they would be understandable to the reader, as per FAA Order 1000.6, FAA Writing Standards, and FAA Order 1050.1E, paragraph 210b implementing Executive Order 12866, dated June 10, 1998.

Letter Codes

FP0025

29-6 **Comment**

Basically the communication with Hispanic residents was zero, I received 10 copies a week and half (while the general comment process was 45 days). 10 copies for thousands of residents.

Response

Please see response to Comments 29-1 and 29-4.

Letter Codes

FP0028

29-7 **Comment**

Your listed FAX NUMBER is another issue; in other [sic] to access the number you were supposed to provide a five digit code, before dialing the number. (as per ATT operator). I strongly tried to make the point to Mr. Nagy that not everyone has a computer, therefore fax access was needed.

Response

The FEIS public notices provided instructions to physically mail or e-mail comments on the FEIS. The Commenter's email did not provide the "listed fax number" within the comment letter in order for the FAA to inquire about a problem. To the FAA's knowledge, Mr. Bart Vernace's fax number (407-812-6978), although not identified within the FEIS announcements, was accepting facsimile transmissions during the FEIS comment period.

Letter Codes

FP0028

29-8 **Comment**

You have deprived hundreds of people of their right to participate, either by language or by technology access.

Response

Please see response to Comments 29-1, 29-3, and 29-4.

Letter Codes

FP0028

29-9 **Comment**

The Hispanic community, which makes up 45 to 60% of the population impacted by this expansion has not received adequate information related to the final report of this study. It wasn't until I reached Mr. Allan Nagy that we received ten copies of the executive summary (under protest by Mr. Nagy until the moment I mentioned Environmental and Social Justice).

Response

Please see response to Comments 29-1 and 29-4.

Letter Codes

FP0029

29-10 **Comment**

The information also was unavailable in the electronic link until last week.

Response

The FEIS was made available on the project's web site for viewing and/or downloading starting on February 4, 2011, the date the Notice of Availability of the FEIS was published in the Federal Register.

Letter Codes

FP0029

29-11 **Comment**

In response to this information [ed., see Comment 5-7], the FAA merely provided the following response in the FEIS: "Comment noted." The FAA provided no explanation for why it failed to consider this information in its overall assessment of the existing and potential environmental impacts on Mar-a-Lago. It is hard to believe that the FAA would ignore public comments about the documented existing negative effects of air traffic operations from the PBIA on Mar-a-Lago. At the very least, the FAA should consider these studies and provide a thorough analysis of the existing environmental impacts on Mar-a-Lago, and how these impacts could be exacerbated by the implementation of the AIP, including ways in which any potential impacts to Mar-a-Lago could be avoided and minimized.

Response

The comment referred to was "A study conducted in the 1990's on the impacts of aircraft overflight to Mar-A-Lago is attached to this letter as Exhibit A for your review." In the Commenter's statement that the FAA ignored the referenced study material, the FAA's response simply acknowledged that the study was included with the original Commenter's submittal. As discussed in FAA's response to Comment 5-7, the agency did consider the letter and its attachments in the preparation of the FEIS.

Letter Codes

FP0041

29-12 **Comment**

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.

Response

A four volume set of the Final Environmental Impact Statement for the proposed airfield improvement projects at Palm Beach International Airport was submitted to the EPA in hardcopy format via FedEx on January 26, 2011. A hardcopy of Appendix K: Consolidated Comment/Response Database was included in Volume 4 of that submittal. In addition, a full electronic version of the FEIS and all Appendix materials was provided as a CD and contained in a sleeve attached to the inside cover of the hardcopy version of the Volume 1 of the FEIS.

Letter Codes

FF0002

29-13 **Comment**

The public is unduly burdened by the conditional assessment of the long term aspect of the Sponsor's Plan because it is required to address a long term plan which may never be implemented and is not supported by current data, the EIS does not provide any specific guidelines as to the requirements for the Sponsor to notify the FAA or public that it wants to proceed with the long term plan or what procedures will be utilized by the FAA to notify the public and accept input or decide not to notify the public and not to accept input.

Response

The FAA, as a matter of ordinary business practice, grants conditional approval of Airport Layout Plans (ALPs). The PBIA ALP illustrates both the proposed Near-Term AIP and the proposed Long-Term AIP. Conditional ALP approval signals that: 1) the proposed features are safe and efficient, 2) environmental review is not completed or the features are not yet ripe for decision, or 3) the FAA has not approved the Airport Sponsor to begin building the facilities shown on the conditionally approved ALP.

See response to Comment 1-2 regarding circulation of future environmental documentation regarding the Long-Term AIP.

Letter Codes

FP0044

29-14 **Comment**

We [EPA] request a copy of the ROD for our review and files.

Response

The FAA acknowledges the EPA's request for a copy of the Record of Decision (ROD) for your review and files.

Letter Codes

FF0002

29-15 **Comment**

Thank you for supplying the Town of Glen Ridge with the Executive Summary of the FEIS. We do not have any input at this time, but we would like to be notified in the future should there be a decision to move forward on the proposed airfield improvement project again.

Response

The FAA acknowledges that the Town of Glen Ridge does not have any input at this time, but would like to be notified in the future should there be a decision to move forward on the proposed airfield improvement project again. Please see response to Comment 1-2 regarding future environmental review and public comment with respect to unconditional ALP approval of an airfield capacity enhancement project at PBIA.

Letter Codes

FL0003

29-16 **Comment**

No public outreach. Why?

Response

See response to Comment 29-3.

Letter Codes

FP0050