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January 13, 2017

Mr. Frank Hatfield
Director, System Operations Security
Federal Aviation Administration
800 Independence Avenue S.W.
Washington, DC 20591

Dear Mr. Hatfield:

On behalf of our members, the Aircraft Owners and Pilots Association (AOPA) respectfully requests that the Federal Aviation Administration (FAA) modify future Presidential Temporary Flight Restrictions (TFRs) over Mar-A-Lago, the estate owned by President-Elect Donald Trump, by creating a cutout to exclude Palm Beach County Park Airport, known locally as Lantana Airport, from the 10 NM inner ring. Since Lantana Airport falls within the 10 NM no-fly inner ring, the airport will be shut down unless special procedures are implemented to provide relief. The Association contends the safety and security requirements of the FAA and the United States Secret Service (USSS) can be accomplished; while providing relief to the hundreds of pilots who utilize this airport daily, by creating a Lantana Airport special arrival and departure procedure that would be part of the TFR Notice to Airmen (NOTAM).

Providing a Cutout and Special Procedure Will Allow Safe and Secure Operations

As you are aware, Lantana Airport is located just 5 NMs south of Mar-A-Lago. This presents unique challenges when considering exceptions to the standard TFR. AOPA is aware of the challenges to allow certain types of operations, primarily flight training, at airports located close to VIPs. We understand that no aircraft should fly over the President's residence while he is at the estate and that the USSS requests all flights be directed away from Mar-A-Lago. By using certain runways at Lantana Airport, such as departing from Runway 15 or 21 and arriving on Runway 9 or 27, both departure and arrival traffic at Lantana Airport can be directed away from the center of the TFR and any flow of traffic directed at Mar-A-Lago can be eliminated. Combined with a published arrival and departure procedure, a cutout for Lantana Airport will allow general aviation to continue to operate while ensuring positive control and identification of all aircraft.

The 30 NM restricted outer ring already includes operational requirements such as filing IFR or VFR flight plan with a discrete code assigned by an air traffic control (ATC) facility and remaining in two-way radio communications with ATC. Using a procedure like that of flying into and out of the Washington, DC Special Flight Rule Area, we believe safe operations can be conducted without compromising the security of the President. In the attachment to this letter, AOPA provides an ideal example of what we would consider an effective cutout to look like for Lantana Airport and how a special arrival and departure procedure could be implemented in the TFR NOTAM.

Economic Impact of TFR on Lantana and Community Would Be Severe

Lantana Airport is a designated reliever for the Palm Beach International Airport and serves the general aviation interests of central and southern Palm Beach County, including the cities of Lantana, Wellington, Deerfield Beach, and areas north of Boca Raton. Approximately 270 aircraft are based at Lantana Airport and it has annual aircraft operations exceeding 120,000 of which 75 percent are from locally generated aircraft owners and operators. The airport employs 250 people full-time, has a direct economic impact of almost \$15 million, and accounts for a total community impact of over \$27 million annually. In addition to the airport's fixed base operator, there are approximately 25 aviation businesses located on the airport property, including a pilot shop and aircraft maintenance facility.

AOPA believes it is important to allow ingress and egress to Lantana Airport when the TFR is active, especially should the President visit the estate frequently and stay there for an extended period. This will limit the financial impact of the TFR on general aviation and the community. The FAA has a long history of working with industry and government partners to provide relief when it is feasible and the case warranted. Cutouts created in Presidential TFRs in New York, Los Angeles, and Dallas are good examples of such considerations and practices.

Conclusion

AOPA respects the need to provide increased security for our President. However, the FAA and USSS should consider the economic and operational impacts to the surrounding community and adjust any restrictions to be least intrusive on the public. It should be the USSS' goal to protect the President, while creating the least amount of economic and operational impacts to the public as possible. In support of any operational relief provided, AOPA would commit to creating and disseminating a hand out of the special procedure and final TFR NOTAM language, including simple step-by-step instructions for arrivals, departures, and requirements, to local pilots, fixed-base operators, and companies based at Lantana Airport. AOPA stands ready to work with the FAA and USSS to develop the special procedures, conduct outreach, and education to ensure the operation is safe for all involved.

We appreciate the FAA and USSS working with General Aviation to minimize the economic and operational impacts of TFRs and for protecting our freedom to fly.

Sincerely yours,



Nobuyo A. K. Sakata
Director of Government Affairs, Aviation Security

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members and establish, maintain and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.

Cc: Mr. Craig Marech, Assistant to the Special Agent in Charge, USSS

Attachment

Below is AOPA's proposed TFR NOTAM modifications to provide a cutout for Lantana Airport and to allow safe and secure ingress and egress at this airport. The procedures we propose should mitigate the concerns for positive and timely identification of aircraft.

Inner Ring Requirement

The standard inner ring language is maintained but with the following addition:

...10 NM ring with center at 264047N0800327W excluding an area defined as 5 NM radius of 263054N0800518W; SFC-3000FT MSL...

Lantana Airport Special Arrival and Departure Procedure

An additional section, detailed below, would be provided in the NOTAM noting the special requirements for utilizing Lantana Airport, which would be the sole airport impacted by the inner ring cutout. The requirement to monitor Guard is an important mitigation to ensure safe operations are conducted at Lantana Airport given the importance of communication and the need for pilots to react quickly.

Ingress or egress to Lantana Airport requires the operator to comply with the Lantana Airport Special Arrival and Departure Procedures:

1. All aircraft must comply with the restrictions and requirements stated for the outer ring, including:
 - a) All aircraft must be on a VFR or IFR Flight Plan
 - b) Squawk the ATC assigned discrete beacon code at all times, including after landing; use of 1200 is not authorized
 - c) Flight training is prohibited
2. VFR traffic pattern operations are not permitted
3. Monitor 121.5 or 243.0 at all times
4. Departure
 - a) Prior permission must be received by Palm Beach Approach Control on frequency XXX.XX or via telephone XXX-XXX-XXXX prior to departure
 - b) If the departure is cancelled following the receipt of permission, the pilot must inform Palm Beach Approach Control as soon as practical
 - c) Squawk the ATC assigned discrete beacon code and contact ATC on the assigned frequency as soon as practical after takeoff
 - d) The only authorized runways for departure are Runways 9, 15, 21, and 27; Do not utilize Runway 3 or 33
 - e) All departures must turn to the south as soon as practical and comply with ATC departure clearance
5. Arrivals
 - a) Squawk the ATC assigned discrete beacon code and remain in two-way contact with ATC

- b) The only authorized runways for arrivals are Runways 9 and 27; Do not utilize Runway 3, 15, 21, or 33
 - c) Do not switch to UNICOM until instructed and remain on assigned transponder code after landing
 - d) Should a go around become necessary, the pilot must contact Palm Beach Approach Control on frequency XXX.XX for resequencing and shall turn to the south as soon as practical
6. If experiencing a communications failure, proceed south exiting the TFR via the most direct route; Do not return to Lantana Airport unless safety necessitates

Depiction of Cutout

The graphic below shows the TFR inner and outer ring with the proposed cutout for Lantana Airport.

