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December 1, 2023

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

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

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

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

Honorable Secretary Hamilton and Chairman Goss,

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

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

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

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

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

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

³ FAA 5010 Database accessed 11/29/2023.

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

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

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

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

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

Sincerely,



Stacey Heaton, AAE
Southern Regional Manager

Attach: OBE AEIS

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

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

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

AIRPORT ECONOMIC IMPACTS



894
JOBS



\$43.1M
PAYROLL



\$73.3M
VALUE ADDED



\$153M
ECONOMIC
IMPACT
(OUTPUT)

About Okeechobee County Airport

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

Okeechobee County Airport

Route Map (CY 2021 data)



STATEWIDE ECONOMIC IMPACTS¹



2,009,088
JOBS



\$109B
PAYROLL



\$170B
VALUE ADDED



\$336B
ECONOMIC
IMPACT
(OUTPUT)

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

STUDY OVERVIEW

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

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

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

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



What is Economic Impact?

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



JOBS

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



PAYROLL

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



VALUE ADDED

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



ECONOMIC IMPACT (OUTPUT)

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



OFF-AIRPORT AIR CARGO

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