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DEPARTMENT OF AIRPORTS

November 18, 2025

VIA E-MAIL

Federal Aviation Administration
Operations Support Group
Eastern Service Center
1701 Columbia Avenue
College Park, GA 30337

Re: Palm Beach County Department of Airports Comments on Proposed
Amendments to the Published Arrival and Departure Procedures at Palm
Beach International Airport

To Whom It May Concern:

The Palm Beach County Department of Airports (the “Department”), as the operator of the Palm Beach International Airport (“PBI”), respectfully submits these preliminary comments on the Federal Aviation Administration’s (“FAA”) proposed amendments to the published arrival and departure procedures at PBI. The Department offers these comments with respect to all ten amended procedures currently under development, as shown on the FAA’s Instrument Flight Procedures Information Gateway (the “Proposed Procedures”).¹ While the Department understands that the Instrument Flight Procedures Information Gateway is primarily intended for the coordination of technical comments on amended instrument procedures, the Department and communities surrounding PBI are concerned that the Proposed Procedures are being developed, without adequate disclosure to impacted residents and businesses, and without state and local consultation that is required by law. We are therefore submitting preliminary comments in order to ensure that the FAA has an adequate opportunity to consider them as it continues to review the Proposed Procedures.

¹ These include the AHABB ONE, MIXAE FOUR, OLAKE THREE, PALM BEACH FOUR, SLIDZ THREE, TBIRD SEVEN, and WELLY FOUR departures, and the ILS and RNAV RWY 10L arrivals. The FAA has requested comments on the AHABB ONE departure by November 18, 2025. See https://www.faa.gov/air_traffic/flight_info/aeronav/procedures/application/?event=procedure.results&tab=coordination&nasId=PBI#searchResultsTop.

Initially, each of the Proposed Procedures indicates it is designed primarily to avoid any incursion into the recently established “prohibited area” within a one-mile radius of Mar-A-Lago from the surface to 2,000 feet (the “Prohibited Area”). This Prohibited Area became effective October 20, 2025, with little forewarning or explanation, and remains in effect at all times, regardless of whether the President is in residence.

While the Department fully appreciates the paramount importance of Presidential security, we are concerned that the impacts on PBI’s users and the surrounding communities and possible alternatives to the Proposed Procedures have not been fully considered. For example, one possible alternative may be to permit aircraft operating under a TSA-approved security program to continue to use PBI’s existing published procedures when the President is not in residence, which would significantly reduce impacts on PBI’s users and surrounding communities. In addition, we believe it is important to be able to demonstrate to the impacted residents and businesses that the FAA has conducted all necessary environmental and safety risk management reviews prior to establishing the Prohibited Area.

The Department has always been able to work collaboratively with the FAA and the U.S. Secret Service to accommodate Presidential security alongside PBI’s operational needs and with due regard to the concerns of the surrounding communities. Now that the government has reopened, the Department intends to actively attempt to engage the FAA and U.S. Secret Service on these matters. Respectfully, however, we believe it is premature to finalize the development of the Proposed Procedures until these conversations are able to occur. If the Prohibited Area is modified in terms of its geographic extent, altitude, permissible use, or times of designation, then the Proposed Procedures could likely be modified to increase safety and efficiency by, for example, eliminating or reducing non-standard components of the Proposed Procedures (e.g., a climb gradient exceeding 500 feet/nm), and to minimize environmental impacts on the communities surrounding PBI.

To the extent FAA intends to proceed with developing the Proposed Procedures, however, it is critical that the FAA fully considers the potential environmental impacts of the Proposed Procedures and fully observes its own internal procedures.

Among other requirements, the National Environmental Policy Act (“NEPA”) requires that the FAA analyze the potential noise impacts of the Proposed Procedures on the communities and cultural resources under the flight paths. NEPA requires that agencies consider potential impacts before they act and disclose such analysis to the public. Based on the timeline associated with the Proposed Procedures, we presume that the FAA intends to fulfill its obligations under NEPA by applying a “categorical exclusion”—that is, a determination that the Proposed Procedures fall within a category of procedural action that “normally do[es] not have a significant effect on the human environment.” However, the currently Proposed Procedures do not appear to be the type of activity subject to exclusion. FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, establishes a categorical exclusion for the “establishment of new or revised air traffic control procedures . . . conducted below 3,000 feet AGL that do not cause traffic to be routinely routed over noise sensitive areas,” or the “publication of existing air traffic control procedures that do not essentially change existing tracks, create new tracks, change altitude, or change the concentration of aircraft on these tracks.”

Neither of these categorical exclusions seems to apply. Concurrently with the establishment of the Prohibited Area, the FAA implemented modifications to the arrival and departure procedures at PBI that, like the Proposed Procedures, require aircraft departing Runway 10L to turn left immediately upon departure to avoid the Prohibited Area, well below 3,000 feet AGL. Such routing has resulted in a substantial increase in overflights experienced by residents of the El Cid and Flamingo Park neighborhoods of West Palm Beach and the Town of Palm Beach.² On November 6, 2025, the County’s Citizen Committee on Airport Noise (“CCAN”) held a public meeting to discuss the impacts of these modifications. Among other concerns, affected residents noted that they are now routinely awoken at 6:05 a.m. by direct overflights (where they had previously been outside of the ordinary flight path of departing aircraft), and complained of fumes, soot, and other aircraft emissions.

Even if a categorical exclusion were to presumptively apply, the FAA must still consider whether “extraordinary circumstances” require at least the preparation of an environmental assessment. Extraordinary circumstances may exist if an action’s impacts on the quality of the human environment are likely to be highly controversial on environmental grounds, or if the action may effect noise over noise-sensitive areas, including historic and Section 4(f) resources. Based on impacts reported by the residents of the surrounding communities’, it appears extraordinary circumstances exist, precluding application of a categorical exclusion.

² We have attached a comparison of flight tracks before and after the establishment of the Prohibited Area.

Under the National Historic Preservation Act (“NHPA”), the FAA must consider the effects of its proposed actions on historic resources and structures, including by engaging in formal consultation with local governments and other stakeholders in the potentially affected areas. The County believes that several historic resources are likely to be affected by the Proposed Procedures. Even if the FAA determines that the Proposed Procedures would not ultimately result in adverse impacts on historic resources, the FAA still must engage in consultation and provide state and local parties with documentation of its findings.

Similarly, Section 4(f) of the Department of Transportation Act prohibits the constructive use of publicly owned parks, recreational areas, wildlife and waterfowl refuges, and historic properties, unless the FAA determines (1) no prudent and feasible alternative to using that land exists, and (2) the proposed action includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use. It appears likely that there are Section 4(f) resources impacted by the Proposed Procedures, including parks, recreational facilities and historic resources in West Palm Beach and the South Cove National Area. The Department believes the presence of these resources requires at least the preparation of an environmental assessment and additional analysis.

Finally, Congress has prescribed specific requirements designed to enhance the FAA’s engagement with impacted communities. The FAA Reorganization Act of 2024 requires that when “substantially revising a flight procedure” the FAA consider implementing “flight procedures that can mitigate the impact of aircraft noise, based on a consensus community recommendation” and consider collaborating with “airport sponsors and potentially impacted neighboring communities in establishing or modifying aircraft arrival and departure routes.” We are concerned that this engagement has not yet occurred; therefore, the Department also respectfully requests that the FAA send a representative to the CCAN meeting in December to begin its engagement with impacted communities regarding the Proposed Procedures.

Importantly, PBI’s existing published arrival and departure procedures are the result of decades of close coordination and analysis by the Department and the FAA, and designed to provide operational efficiency while minimizing impacts on the communities surrounding PBI and historic and cultural resources. The Proposed Procedures would substantially modify PBI’s existing procedures and threaten to disrupt long-standing community expectations as to where aircraft noise and other impacts are concentrated. Particularly in light of the long history of robust community engagement and, at times, litigation regarding potential noise impacts associated with operations at PBI, it is essential that the FAA comprehensively analyze and disclose the potential impacts of so fundamentally altering the status quo through the Proposed Procedures.

The Department appreciates this opportunity to comment on the Proposed Procedures and looks forward to further engagement with the FAA regarding our concerns. In light of the known impacts to PBI and its surrounding communities, the Department encourages the FAA to more fully engage with all stakeholders and specifically consider whether the presence of extraordinary circumstances, including the substantial community outcry regarding the already-implemented modifications to flight procedures and the presence of cultural, historic, and Section 4(f) resources, requires further analysis and consultation. The Department stands ready to assist the FAA with the development of Proposed Procedures that consider these concerns, and reserves its right to supplement these comments as the Department continues to conduct its own analysis.

Please do not hesitate to contact me if you have any questions.

Respectfully Submitted,

Laura

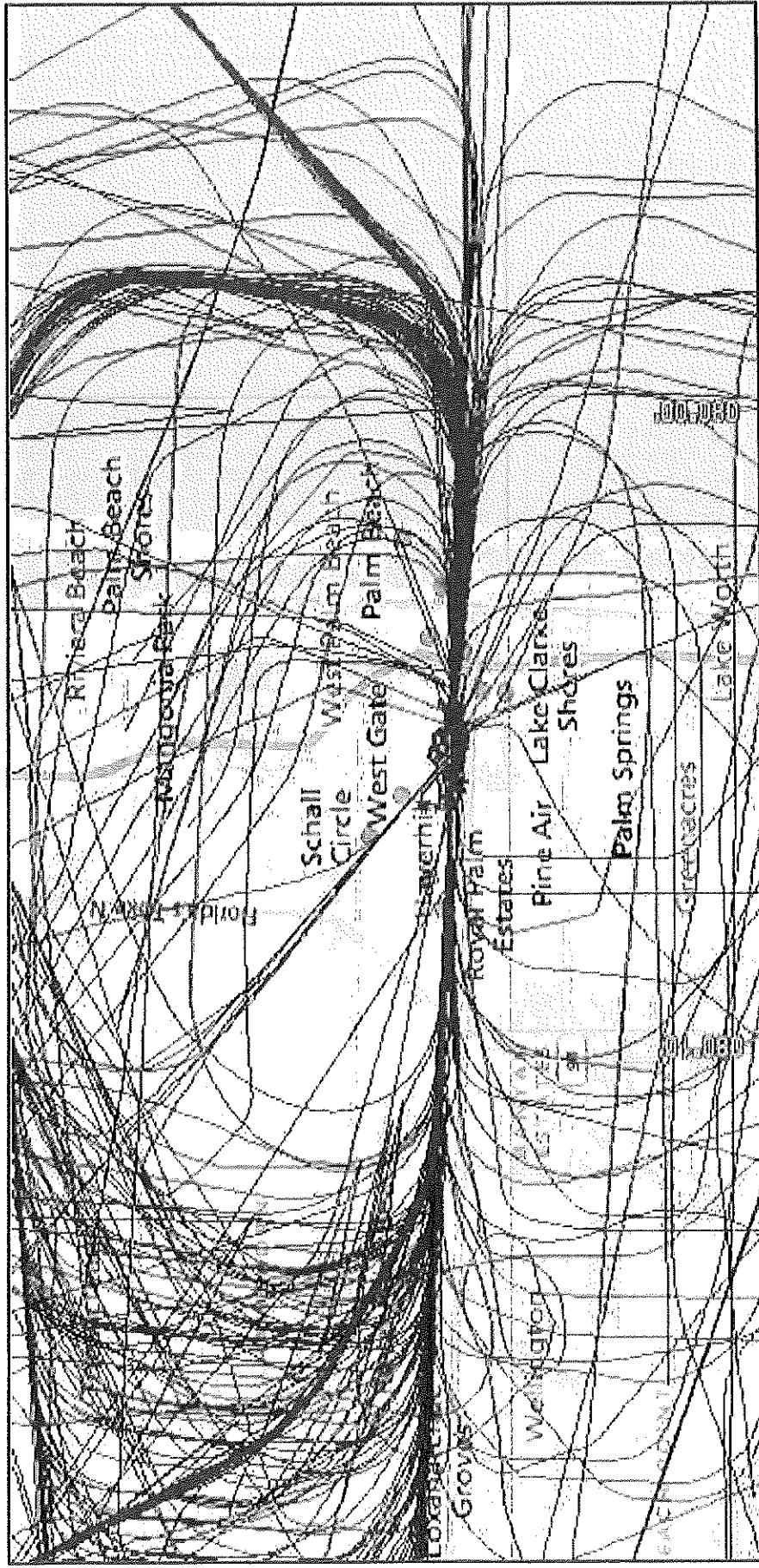
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Laura M. Beebe
Director of Airports

Digitally signed by Laura Beebe M
DN: DC=org, DC=ptegov, OU=Enterprise,
OU=Signer, OU=Users, CN=Laura.Beebe
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Reason I am approving this document
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cc: Ryan Almasy, Acting Regional Administrator
William Liam McKenna, Chief Counsel
Jasmine Evains, Acting Director
Juan Brown, Orlando ADO Manager

October 1, 2025 – Before Prohibited Area



October 29, 2025 – After Prohibited Area

