



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Orlando Airports District Office  
8427 SouthPark Circle, Suite 524  
Orlando, FL 32819  
Phone: (407) 487-7720  
Fax: (407) 487-7135

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[via email to: [jhurst@co.okeechobee.fl.us](mailto:jhurst@co.okeechobee.fl.us)]

Mr. John L. Hurst  
Airport & Commerce Park Director  
Okeechobee County Airport & Commerce Park  
2800 NW 20th Trail  
Okeechobee, FL 34972

RE: Proposed Lower Kissimmee Basin Stormwater Treatment Area (LKBSTA)  
Okeechobee County, Florida

Dear Mr. Hurst,

We have reviewed the proposed development of a surface water treatment facility that would be developed in the vicinity of the Okeechobee County Airport (OBE). Based on the information provided, the project would take water from the Kissimmee River and circulate the water through a series of man-made wetlands/marshes to remove phosphorus and other nutrients. Once treated, the water would be discharged back into the river.

Okeechobee County Airport is a public-use airport that is used by a wide variety of aircraft, including business jets. A portion of the proposed water quality treatment project site is located within five miles of the airport and on the extended centerline of Runway 5-23, the airport's primary runway. The site is located under a segment of the non-precision instrument approach procedure for Runway 5. The same area is traversed by many aircraft departing the airport on Runway 23.

FAA Advisory Circular (AC) 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports*, provides guidance on certain land uses that have potential to attract hazardous wildlife on or near public-use airports. Hazardous wildlife can threaten aviation safety. The FAA recommends this guidance for airports that receive funding under Federal grant assistance programs. The FAA urges regulatory agencies and planning and zoning agencies to evaluate proposed new land uses within the separation criteria and prevent the creation of land uses that attract or sustain hazardous wildlife within the separation distances. For all airports, the FAA recommends a distance of five miles between the closest point of the airport's aircraft operations area and the hazardous wildlife attractant. Special attention should be given to hazardous wildlife attractants that could cause hazardous wildlife movement into or across the approach or departure airspace.

Based on FAA's initial review, the proposed water quality treatment project does not fully comply with the hazardous wildlife attractant separation distances, as outlined in AC 150/5200-33C. It is FAA's understanding the proposed water quality treatment project will pump water from the Kissimmee River and release the water into cells containing man-made wetlands and marsh habitat. The river water would flow through the cells and nutrients (phosphorus) would be filtered and absorbed by the wetland vegetation. This man-made wetland and marsh habitat is likely to attract a wide variety of wildlife, including avian species hazardous to aviation activity.

As noted in section 2.3.5 of AC 5200-33C, artificial marshes and submergent and emergent vegetation may be used by flocking species of blackbirds and waterfowl for breeding and roosting activities. The FAA recommends against establishing artificial marshes within the separations identified in the AC. Wetlands, including constructed wetlands, can also be attractive to many types of wildlife, including many of which rank high on the list of hazardous wildlife species listed in Table 1 in 1AC 50/5200-32B, *Reporting Wildlife Aircraft Strikes*. Table 1 in this AC includes a composite ranking (1 equals most hazardous and 50 equals least hazardous) and the relative hazard score of fifty wildlife species with at least 100 reported strikes with civil aircraft based on three criteria (damage, major damage, and effect-on-flight).

Qualified Airport Wildlife Biologists conducted hazardous wildlife surveys at OBE in September 2016. A total of 2,909 individual birds comprised of 27 species were observed during the surveys at OBE. Of all the observations, 71 percent were wading birds, including cattle egrets, white ibis, sandhill cranes, and great blue herons. Cattle egrets and white ibis were considered the most hazardous species at OBE at that time due to their large flock size. The LKBSTA, as described, will be very desirable habitat for wading birds. The existing South Florida Water Management District (SFWMD) STAs are coveted for both their bird watching and waterfowl hunting opportunities.

Based on the existing data for OBE and south Florida STAs, the FAA recommends that the proposed water treatment facility is located outside the 5-mile separation distance from OBE. If there is no alternative to the proposed water quality treatment project location, the state agencies having approval authority over the proposed project, in cooperation with Okeechobee County and the FAA, should consult a Qualified Airport Wildlife Biologist to develop potential mitigation strategies should the LKBSTA create a wildlife hazard for the airport. Mitigation strategies can identify both design and operational measures to be employed to ensure aviation safety.

Thank you for reaching out to advise our office of the proposed project. If you would like to discuss our concerns further, you can contact me at (407) 487-7296 and [peter.m.green@faa.gov](mailto:peter.m.green@faa.gov).

Sincerely,

Peter M. Green, AICP  
Environmental Protection Specialist  
Orlando Airports District Office