

**Robert C. Mentzer**

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**From:** Alicia Fella <amf204@gmail.com>  
**Sent:** Wednesday, May 29, 2024 4:47 PM  
**To:** LNAPart150  
**Subject:** Unbearable Noise Levels Caused by Excessive Air Traffic at LNA

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[EXTERNAL]

**To:** Palm Beach County Park Airport  
(<https://discover.pbcgov.org/Airports/pages/park.aspx>)

**From:** Alicia Fella  
**Address:** 437 French Royale Circle Lake Worth, Florida 33462

**Date:** May 29, 2024

**Subject:** Unbearable Noise Levels Caused by Excessive Air Traffic at LNA

Dear Palm Beach County Park Airport Administration,

I am writing to express my extreme dissatisfaction with the unreasonable amount of air traffic currently plaguing residents living near the airport. For over 20 years, I have resided in Atlantis, and the situation has become increasingly unbearable.

The constant barrage of noise from low-flying fixed-wing aircraft and helicopters disrupts daily life. This issue is not new, as evidenced by numerous articles dating back to 2017 ([https://discover.pbcgov.org/Airports/pdf/LNA\\_noise\\_procedures.pdf](https://discover.pbcgov.org/Airports/pdf/LNA_noise_procedures.pdf)) and as recently as February 2023 (<https://www.wptv.com/news/region-c-palm-beach-county/lantana/emergency-crews-respond-to-small-plane-crash-at-lantana-airport>). These articles highlight the safety concerns and constant noise endured by residents.

Even with brand new hurricane-resistant windows with noise-reducing silicone caulking, the airplane noise penetrates our home throughout the day. The situation is particularly disruptive on weekends when I attempt to relax outdoors. High-quality noise-canceling headphones are a necessity to escape the constant roar of take-offs and landings.

Furthermore, the airport's apparent use as a training facility exacerbates the problem. The continuous loop of practice maneuvers occurring every five minutes creates an environment akin to rush hour traffic on I-95, according to pilots I have spoken with.

I urge you to take immediate action to address this excessive noise pollution. Residents deserve peace and quiet in their own homes. I request a comprehensive review of air traffic patterns and the implementation of stricter noise abatement procedures.

Thank you for your time and attention to this urgent matter. I look forward to your prompt response and a plan to mitigate the excessive noise levels.

Sincerely,

Alicia Fella  
585-645-3384



Dear Members of the Part 150 Study Team,

My name is Hank Pawski, and I represent the senior community of Murry Hills, comprising 518 condominium owners. I am also the Chairman of the Palm Beach County Fair Housing Board and a member of the Lake Worth Beach Planning Board. With a background in aeronautical flight operations for a major airline, I have substantial experience with noise abatement procedures, particularly those implemented over New York airports.

I have attended numerous meetings related to the Part 150 Study, focusing on noise and the Noise Exposure Map. Our community's concern is the persistent and disruptive noise from Lantana Airport (LNA), which severely impacts our ability to enjoy outdoor activities. Despite being assured that voluntary measures would mitigate airport noise, we continue to experience significant disruptions due to aircraft and helicopters violating noise abatement guidelines.

Our community cannot enjoy our common areas due to the deafening noise, even on Sundays. We understand that there are limitations to restricting airport operations to specific times or altitudes. However, the continued disregard for voluntary noise abatement measures is detrimental to our quality of life.

We request a thorough review and reinforcement of these measures. It is essential that LNA adheres to the agreed-upon noise abatement procedures to mitigate the impact on our community. Your attention to this matter is crucial for improving our living conditions and ensuring that voluntary measures are not just promises but effective actions.

Thank you for your consideration.

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 Lantana Part 150  
 HMMH  
 700 District Avenue, Suite 800  
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## COMMENTS ON PART 150 DRAFT STUDY

From: William Coakley

5934 Lake Osborne Dr

Airport Committee – Lake Osborne Estates Civic Association

To: Board of County Commissioners, Laura Beebe, Director Department of Airports, Robert Mentzer, Project Manager, LNA Part 150 Study

Date: June 7, 2024

### BACKGROUND

#### EXISTING NOISE MITIGATION WITH A SAFETY BENEFIT

The original configuration of the Helicopter Flight Standards/mitigation included an additional provision that all helicopter pattern training would be conducted west of 441, we will revisit this a little later. For the past 25 years, there have been six items listed in the Flight Standards. Four of the six, repeat the same thing for emphasis on the critical importance of preventing any helicopter pattern training over the densely populated residential areas near the airport. Here are the four for helicopters:

1. Keep all pattern routes over airport
2. Operate away from residential areas
3. PLEASE - no activity conducted over populated areas
4. Flight training should remain north of Lantana Road, West of Lake Osborne and east of Congress Avenue, on airport property - when possible.

These mitigating measures were designed by helicopter professionals, operators, pilots and schools, to protect the residential communities and as we shall see, they offered a collateral Safety benefit to pilots. The 2015 mid-air collision at LNA, between a fixed-wing aircraft and a training helicopter ...would not have occurred if helicopter schools were complying with the County's Flight Standards/Voluntary Guidelines, thus the Safety benefit of County Standards/Voluntary Guidelines.

FLIGHT STANDARDS - Flight Standards and government consistency in maintaining them, speak volumes regarding their reasonable and appropriate application over the past thirty years.

At the time of their commissioning, the Standards addressed a potential threat from a non-compatible use of the airport which required mitigation, namely, repetitive helicopter pattern training over residential areas. Standards were agreed upon and they have remained for thirty years, unchanged and unchallenged attesting to their reasonable and appropriate application.

The County fully anticipated helicopter schools, pilots, and operators would comply with their own rules, making further statutory rendering unnecessary. Consequently, these Flight Standards/mitigation were left in NON-MANDATORY STATUS and are labeled as VOLUNTARY GUIDELINES.

The refusal of tenant helicopter training schools, to comply with County Standards (their own rules), and the insistence of the schools to train exactly where they agreed with the County that they should NOT train ...has been motivated by a purely economic goal of running up traffic counts adding to the profitability of the school(s). This comes at public expense, as the residential communities who were to be spared this assault on their quality of life, have, for twenty five years, been forced off their patios and porches, cannot have open windows during the temperate season, and have no idea when the next eruption of aviation noise will come, or how long it will last.

FACTS: HELICOPTERS PATTERN TRAINING AT LNA are 3 - 5 times more noisy than comparable fixed wing trainers

1. double the noise due to full power landings whereas fixed wing are nearly inaudible in the same situation
2. They move much slower, concentrating more noise per unit of surface area
3. Their patterns are roughly half the size of fixed wing trainers, thus concentrating more noise in a smaller area
4. smaller patterns with touch and goes mean much higher traffic counts
5. The impulse noise and general noise spectra (snarly sound) are far more penetrating and annoying.

THE RACEWAY – As can be seen in a soon to be released VIDEO and also seen in the flight data... the havoc, inconvenience, and delays caused by helicopters seizing taxiways and turning them into their private runways, is a chronic problem adding to congestion, confusion, and a density of flight operations double that of any other airport within a thirty-mile radius. This practice known as the RACEWAY, circumvents the orderly use of runways so the helicopter schools can run up higher traffic counts which in turn translates into more revenue for the school. It is purely an economic decision. But it comes at public expense and makes a mockery of the County's Flight Standards by drastically increasing operation counts, infusing repetitive training noise that is 3 – 5 times more noise than fixed wing aircraft would generate doing the same thing.

RECOMMENDATION - A formal statement should be solicited from the FAA, that training helicopters using taxiways as runways and conducting parallel landings and takeoffs for hours at a time, is a best practice and is considered a safe operation that the FAA endorses.

## BY SECTIONS OF THE NCP

FROM SECTION 4.1

“KEEP PATTERN TRAFFIC WITHIN A MILE OF THE RUNWAY”

RECOMMENDATION - It should read for both fixed wing AND Helicopter patterns:

KEEP PATTERN TRAFFIC ABOUT A MILE FROM THE RUNWAY. This will significantly reduce the concentration of noise in Lake Osborne Estates, and other affected noise sensitive areas.

EXPLANATION - Saying “within” gives opportunity to concentrate noise over already noise saturated areas near the airport as the flight history shows. And this Standard should apply to helicopters as well. The public shouldn’t be the victim of tiny helicopter patterns where the noise is often constant because the school is ramping up a traffic count for economic reasons. Keep pattern traffic “within” one mile of the runway, confines the noise over areas already saturated with low altitude helicopter noise and it precludes any relief for the number one noise sensitive area. Pattern traffic should be about a mile from the runway.

FROM SECTION 4.2.2

THE FOLLOWING QUOTE FROM THIS MEASURE (4.2.2) EXPLAINS WHY HELICOPTERS NEED TO BE INCLUDED AND REFERENCED IN THIS MEASURE:

“However, by limiting intersection takeoffs, fixed-wing aircraft will use the available runway length for takeoff, resulting in higher altitudes over residential areas near LNA.”

RECOMMENDATION – Include helicopters in this measure since generally, we don’t see them above 300 ft over the first row of housing east, and they are not employing “best rate of climb,” as the flight data shows. And this occurs because they commonly conduct mid field, intersection, or end of field departures as noted by the consultant who marked “H1” (the starting place for helicopter takeoffs) at mid field. This puts helicopters at significantly lower altitudes over residential areas east which concentrates noise in those areas with repetitive training from the RACEWAY. This fundamental analysis is missing from the study along with any analysis as to exactly how helicopters are concentrating noise in the area that reports them the most.

EXPLANATION - To demand only one type of aircraft (fixed wing) to operate so as to minimize noise over residential areas while letting another type off the hook is discriminatory and allows the worst concentration of noise over residents to continue without any relief. And, helicopters are allowed to do touch and goes on runway 10/28 making it possible to drastically increase their traffic counts... while fixed wing aircraft are not supposed to conduct any touch and goes anytime on 10/28.

Twenty years of complaints has resulted in more noise, not less. The aim of maximizing takeoff distance, is to maximize altitude over residential areas and that applies equally to ALL AIRCRAFT not just one type. Although the school(s) maintain their helicopters leave airport boundaries at 500 ft minimum... the flight data shows they are typically about 100 to 200 ft, not anywhere near 500 ft and

that has been consistent for decades. In fact, over the first row of housing 900 feet east of the airport boundary, they are seldom over 300 feet when the east runway 10 is in use. This is directly due to mid field, end of field, and intersection takeoffs AND not following another County Standard of employing “best rate of climb,” for helicopters.

FROM SECTION 4.2.3 “HELICOPTERS WILL USE A RIGHT-HAND PATTERN CONSISTENT WITH CURRENT OPERATIONS.”

That “Right-Hand pattern” and “Current Operations,” are not defined anywhere. The study says they are on pages 4-7, 4-8, but those are fixed wing patterns.

And, there are no track maps of helicopter patterns showing what helicopter training tracks really look like and how they show the concentration of noise from the RACEWAY. However, If pages 4-7, 4-8 are intended to show those helicopter patterns as the same as fixed wing patterns... that is fine, but say so.

EXPLANATION - From the flight tracks, helicopter patterns and their concentration of noise especially into Lake Osborne Estates, are missing from the study and consequently there are no recommendations for the much-needed relief. This omission from the study could be due to a number of possibilities:

1. The tiny 1.8% or 13 days noise measurement over two years during Covid lockdowns
2. helicopter schools having advanced knowledge when noise measurements were taking place,
3. the incorrect microphone placement of NM28 where it failed to meet the stated spec for recording noise in Lake Osborne Estates.

Any, or all of these could significantly skew the results of the noise measurements which were not required by the 150 Study but they did align perfectly with the subsequent FAA model which implies that the modeling suffers from possible input or other form of error.

RECOMMENDATION - Perhaps it was an oversight that the Part 150 Study consultants left out any description or pictures of helicopter training pattern tracks. If these were included, it would show the cruel practice of concentrating noise over the Southern portion of Lake Osborne Estates over the past two decades as pleas were made for relief. This omission leaves out what the study was supposed to be FOR. The VIDEO mentioned earlier in this report will cover in detail what’s missing.

In addition to inaccurate noise measurements, and nothing said regarding helicopters following the same rules for mid field takeoffs, and helicopters left being exempt from a ban on touch and goes on runway 10/28 ...further work and review is necessary to fulfill the purpose of the study. This will all be covered in the VIDEO referenced in the introduction to these recommendations. Regardless, the omission of helicopter training pattern descriptions, graphics, analysis and a realistic evaluation of the vast negative impact on residents is concerning.

The conclusion from Section 4.2.3, that helicopters follow “Established Voluntary Flight Training Patterns,” those patterns need to be presented.

Therefore, no decisions should be made at this time pending the production of materials and analysis mentioned in this report.

FROM SECTION 4.2.7 helicopter arrival and departure routes

Lantana Road access route for arrivals and departures

RECOMMENDATION - The southern portion of the Lake centerline offers the best option... and its less noise for residents. It should be emphasized to arrive and depart in a manner that maximizes the altitude over residential areas and to not conduct mid field and end of field departures as we often see.

EXPLANATION - The proposal for a Lantana Road access route would just infuse more aviation noise into an already noise saturated area that has been somehow overlooked in the study. Most of the noise complaints originate from the southern portion of Lake Osborne Estates north of Lantana Road. Encouraging more noise into that noise sensitive area, especially where helicopters are operating at very low altitude only makes matters worse.

FROM SECTION 4.3.2 KEEP HELICOPTER PATTERN ROUTES OVER AIRPORT

HELICOPTER PATTERN TRAINING WITHIN AIRPORT BOUNDARIES

“PBCDOA does not recommend retaining this existing measure at LNA since it is not feasible for all helicopter patterns to be contained within the boundaries of airport property.”

Define “All helicopter patterns...” where are those patterns described or displayed in the study?

We don’t have any reference for helicopter patterns which were referenced to page 4-7, and 4-7 but those pages only list fixed wing patterns.

CONSIDERATION - The central intent of the Flight Standards/mitigation was to discourage any helicopter pattern training at LNA, a known non-compatible use of the airport that required mitigation measures which were enshrined in the County Commission’s Flight Standards for thirty years.

An option was provided so that some types of pattern training might be possible while remaining within airport boundaries i.e. while still complying with the prime directive of ‘no helicopter pattern training over residential areas.’ With the original pattern altitude of 500 ft, and far less traffic congestion than we have now, this was a less favorable but realistic option for helicopter schools. It was more feasible twenty years ago when traffic congestion was less and the FAA hadn’t doubled the pattern altitude which they did in an effort to mitigate the infusion of high levels of helicopter noise into residential areas due to the refusal of helicopter schools to honor their agreement to not conduct flight operations over residential areas according to County Flight Standards. Given that non-mandatory or Voluntary status of the County’s Flight Standards, there is no cause to add a feasibility clause or eliminate a Standard that survived thirty years. Since feasibility is irrelevant to the thrust of the helicopter Standards which calls for NO TRAINING OVER THE DENSELY POPULATED AREAS NEAR THE AIRPORT when possible ...and in consideration that these rules are VOLUNTARY, it could be left alone. The data shows the helicopter schools never considered it feasible although the training helicopters were and are capable. This measure was simply a courtesy option and reminder that under certain cases, pattern training over the airport was considered within the scope of the Standard measure.

Feasible or not, “feasible” isn’t the Standard and at one time it WAS feasible... and LESS feasible now. The original altitude of 500 ft for the pattern would have made it possible for students advanced in the program to comply but, when the FAA doubled the traffic pattern altitude to a 1000 ft, and the density of flight operations became double that of any other airport in the area (including PBI)... without a reduction in traffic, that prospect was diminished as safety issues were considered.

#### FROM SECTION 4.3.3

MOVING TENANT(S) TO ANOTHER LOCATION IS NOT DISCRIMINATORY when tenant(s) refuse to comply to mitigation they designed and the County adopted to protect the public.

If a tenant has dishonored his agreement with the County, after being granted to privilege of operating a business with its associated risk on public land, where a Duty of Care for the public is implied, and that Duty of Care is to conduct the business according to agreed upon Standards, and thereby CARE for the public according to the agreement... that is not discrimination. The County fully anticipated the business would comply with rules/Standards the tenant helped construct and agreed to operate under. And, it is not discriminating against a type, kind or class of aeronautical activity if a tenant is refusing to honor his agreement with the Sponsor.

#### 4.3.6 ...and conclusion

If you haven’t described what the problem is, then how are you solving it? The Study Draft omits the most central point of its commissioning. What are the helicopter issues concerning noise? No one has explained that. Nothing should be concluded at this point.

Our focus has been to create solutions:

1. The AFOMS (Automated Flight Operations Monitoring System) that relieves the public from having to monitor and report on the airport since neither the FAA or County are monitoring it.
2. Providing the first Airspace Study that shows LNA traffic density/contours in relation to other airports in the area.
3. Recommendations that reduce aviation noise into residential communities.
4. The forthcoming VIDEO explanation of helicopter flight track data.

As a Commercial Pilot who flew out of LNA for many years, started its first Pilot’s Association, and was its long-standing VP, and as a resident of Lake Osborne Estates and member of its Civic Association, I look forward to any discussion regarding what’s missing thus far in the Draft Part 150 Report.



### COMMENT FORM Palm Beach County Park Airport (Lantana Airport) Part 150 Noise Compatibility Planning Study

Please provide your comments below. If more space is needed, please use an additional sheet of paper. You may place your comments in the "comment box" provided at the meeting or send to Robert Mentzer at the address on the bottom or by email to rmentzer@hmmh.com or LNAPart150@hmmh.com.

For more information please visit our project website at: <https://www.lnapart150.com/lnapart150>

Please see attached

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Robert C. Mentzer Jr.  
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700 District Avenue, Suite 800  
Burlington, MA 01803

**The following comments concern the Part 150 Draft Report.**

**I am concerned that the Report does not address an important issue that has been raised by the residents of the city of Atlantis and the residents of other communities that are near the Palm Beach County Park Airport, which airport is commonly known as the Lantana Airport.**

**That issue centers on repetitive pattern training by helicopters, frequently at low altitudes, over the city of Atlantis and the neighborhoods surrounding Lake Osborne. Also, while most fixed-wing pilots are “good neighbors”, there are some who fly repetitively at low altitudes over the communities.**

**I have lived in Atlantis for over 40 years, and moved there knowing that the community was next to the airport. Other communities, such as Lake Osborne Estates and Murry Hills, are virtually the same today as they were in the 1960’s and 1970’s. Similarly, residents moved to those communities with the knowledge they were next to the airport.**

**While the communities are the same, the airport has changed significantly from small, recreational plane operations up to the late 1990’s to the introduction of helicopters in the late 1990’s and now jets after a 50-year ban. With the increase in activity and type of aircraft use at the airport over the years, noise has significantly increased.**

**In response to resident concerns about noise, the County and representatives of surrounding communities and the airport worked together to develop balanced guidelines that mitigated noise impacts on communities. Those guidelines have been in effect for at least 20 years. Now, the Part 150 Report states that the key guidelines that mitigated the noise impacts on communities should not be continued because operators argue that “it is not feasible” for them to adhere to them.**

**In the Appendix to The Part 150 Report NCP Section, there is a summary of recommendations contained in the Helicopter Assessment Report that was sponsored by the County and published**

**in 2009. The Assessment Report provides a summary of recommendations that are supportive of the existing voluntary guidelines and provides a way in which the County can balance the interests of airport operators and nearby residents.**

**The Part 150 Study recommendations that remove the responsibility of helicopter operators to avoid flying over residential areas, especially while pattern training, is not maintaining an appropriate balance between the airport users and the quality of life of the residents.**

**I would ask that the Department of Airports maintain guidelines that place responsibility on pilots to avoid low flights over residential areas and discourage flight pattern training over residential areas.**

**Thank you.**

**Art Villwock    resident of the city of Atlantis**



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June 7, 2024

Laura Beebe, Director  
Palm Beach County  
Department of Airports  
1000 PBIA  
Suite 846  
West Palm Beach, FL 33406-1412

**RE: Comments of the City of Atlantis on the Draft PART 150 Study NEM and NCP for Palm Beach County Park Airport (LNA)**

Dear Ms. Beebe:

At the outset, on behalf of the residents of the City of Atlantis, I would like to offer thanks to the County Commissioners for their support of residents in LNA-adjacent communities in addressing noise and safety issues at LNA.

I would also like to acknowledge and thank you and your team for their efforts in attempting to strike an appropriate balance between the interests of LNA operators and neighboring communities.

The Executive Brief submitted by PBCDOA to the County Commissioners in support of funding for the Part 150 Study states that:

“In an effort to address community concerns with noise impacts of aircraft overflights, particularly helicopters, in the vicinity of LNA, the Department of Airports (Department) is recommending the County initiate a Noise Compatibility Study...”

The Executive Summary of the Noise Compatibility Program (NCP) section of the Part 150 Study states that “the Noise Exposure Map (NEM) did not identify any noncompatible land uses within the 65 decibel (dB) contour...” under the modeling constraints proscribed by the Federal Aviation Administration (FAA).

As a result, The Executive Summary states that the NCP “...is a description of the actions the airport proprietor proposes to undertake to reduce existing and minimize future noise and noncompatible land use.” It also states that “...the NCP report will not be officially reviewed ...” by the FAA but, “... the NCP will be used by PBCDOA to pursue measures outside of the Part 150 process...” recognizing that those measures may require FAA analysis, environmental review under the National Environmental Policy Act (NEPA) and approval...”

Section 1.4 of the NCP Report highlights the County’s historical efforts to address LNA noise issues by working with communities and airport users in the early 1990’s, before the Part 150 program, including the 1991 Interlocal Agreement with the City of Atlantis and culminating in the voluntary noise abatement

procedures for fixed wing and helicopter operations at LNA that were issued by the County "... as early as 2004". Subsequently, in 2009, PBCDOA published the Palm Beach County Park Helicopter Assessment. In 2012 and 2017, PBCDOA contacted the FAA "...to request guidance on implementing additional helicopter measures..." per the Assessment. In response to the County, the FAA suggested the Part 150 study process.

That Assessment, referenced in Appendix B of the Draft NCP, provided a number of recommendations and states that they are not "...to dismiss, but rather to revise and supplement rules previously developed by the DOA." The Helicopter Assessment recommendations included:

- Limiting hours of helicopter operation;
- Limiting the number of helicopters operating in the pattern;
- Modifying operational characteristics (e.g., faster airspeeds, shallow bank turns, higher altitude operations, establishing patterns over highways and commercial/industrial areas;
- Raising the airspace veil above LNA to 1700 feet or more
- Investigating and Implementing noise reduction technology;
- Not taking actions that further encourage helicopter activity (e.g., not constructing additional facilities such as practice pads, parking and hangers which could be developed at other airports in the County system), and
- Using lease provisions such as rental rates, lease renewal and payment terms and insurance requirements to make alternative airport facilities more attractive to helicopter operations.

The Interlocal Agreement, Voluntary Guidelines and Helicopter Assessment demonstrate the County's long-term commitment to working with all LNA stakeholders to address LNA noise issues and should serve as a foundation for mitigating and lessening the noise impact on residents of LNA adjacent communities.

Therefore, the critical question for any proposed measure under the Part 150 NCP is: **will the action mitigate or lessen noise impacts on residents of LNA adjacent communities? If not, it should not be pursued.**

The residents of Atlantis and other LNA adjacent communities participated in the Part 150 Study with the expectation that measures would be established to reduce the noise impacts of helicopters and the relatively few fixed wing aircraft that are operated in a manner inconsistent with best practice noise mitigation goals under established guidelines and industry protocols.

While LNA neighboring communities appreciate the PBCDOA's efforts to address LNA noise issues, **it must be acknowledged that the Part 150 process is limited by the FAA's requirements for modeling noise impacts which are totally unresponsive to the resident complaints that were the basis for supporting the Part 150 Study.**

For example, the numerous, historical complaints filed with respect to repetitive and sequential pattern training, sometimes at low altitudes, for hours at a time over residential sections of Atlantis and Lake Osborne neighborhoods, could not be addressed under the FAA contour modeling requirements.

Yet, residents still live with noise levels that are greatly intrusive to their quality of life. Please see Attachment A which I received last month from residents of the French Royale Homeowners Association, located within the City of Atlantis.

Also, earlier in the Part 150 Study process (2021), the City of Atlantis had provided to PBCDOA comments from the City's aviation consultant, JDA Aviation Technology Solutions, regarding shortcomings in the development of the baseline forecast for LNA per FAA requirements.

The bottom line is that because of FAA requirements, there is nothing that can be done about the failure of the NEM to address resident complaints. However, the NCP enables the County to ensure that it undertakes actions that address adverse noise impacts on LNA-adjacent communities and that the County avoids any actions that would make noise impacts worse.

Also, given that all noise mitigating measures will continue to remain voluntary, it will be critically important to establish the transparent, data-driven, user-friendly Airport Noise and Operations Monitoring System (ANOMS) that has the public interface features that were outlined in our comments on the development of the ANOMS RFP. It is critical to ensure that there is a fact-based identification of operators who do not adhere to noise abatement protocols so that they can be clearly identified and reminded by the PBCDOA of the operational behavior that is representative of being a good neighbor.

With respect to the NCP specific recommendations, the City of Atlantis offers the following comments on the recommended measures set forth in the NCP. These comments focus on specific recommendations by NCP Section number that should be revised based on the above-referenced foundational documents and the Study premise of lessening the noise impact on communities by helicopters and fixed wing aircraft:

4.2.2 Maintains the existing PBCDOA measure to discourage intersection takeoffs from any runway for all fixed wing aircraft to allow aircraft to use the full length of runways to reach a higher altitude at takeoff resulting in higher altitudes over residential areas adjacent to LNA. This measure should be modified to include helicopters to achieve higher altitudes over residential areas and reduce sequential pattern actions as recommended in the Helicopter Assessment Report.

4.2.3 Maintains the existing PBCDOA measure with respect to voluntary flight training patterns for fixed wing aircraft with specified distances and flight path directions. The recommendation suggests that this measure should also be applicable to helicopters. This measure should be modified to require that the same specified distances and flight path directions should be followed by helicopters as a measure to mitigate repetitive and or sequential patterns as recommended in the Helicopter Assessment Report

4.2.4 Maintains the existing measure that fixed wing and helicopter pilots implement best practices for flying neighborly and following recommended noise abatement practices. This measure should provide for a process to ensure that fixed wing and helicopter pilots are knowledgeable of the specified best practices and the established voluntary guidelines.

4.2.5 Maintains the recommended helicopter altitude of 1,000 MSL. This measure should revisit raising the airspace "veil" to 1,700 feet or more above and around LNA as recommended in the Helicopter Assessment Report.

4.2.8 As noted, improvements to Runway 4/22 should be deferred until the completion of the County's LNA Safety Study and specific measures should be proposed to promote the use of Runway 4/22 by both fixed wing aircraft and helicopters.

4.2.10 The recommendation to change Eastern Standard times for touch and go operations is helpful, but it should not remove the current measure that provides for no touch and go operations on Runway 10/28 at any time. The assertion cited in Table 1-1 that “ due to winds and airfield limitations, this measure is currently not followed because operators do not consider it feasible. “ is contradicted by the discussion on the wind rose analysis in Section 4.2.8.

4.3.2 This recommendation would remove the current voluntary guidelines regarding helicopters which provide for keeping all pattern routes over the airport and operations away from residential areas. The rationale asserted in Table 1-1 is that: “this measure is currently not followed because operators do not consider it feasible.”

- Removing this guideline is unacceptable and not justified because it is based on assertions, not any substantive proof. Obviously, there are helicopter operations currently over the airport. There should be a detailed description of what helicopter operations are capable of remaining over the airport and those that cannot and why they cannot.
- Moreover, mitigating alternatives to reduce operations and/or noise over residential areas should be established. Possible actions were discussed in both the TAC and CAC meetings but are not reflected anywhere in the NCP. Those recommended actions are consistent with the County’s Helicopter Assessment Report which suggested mitigating actions, including
  - o limiting the number of helicopters in pattern training, which the report cites as also having safety benefits.
  - o modifying operational characteristics, including faster airspeeds, shallow bank turns, flying at higher altitudes, establishing patterns over highways and industrial areas, and
  - o investigating and implementing noise reduction technologies.

4.3.3 States that relocating pattern training to another airport would not be possible because the helicopter school operating at LNA stated “it would not be feasible”. Once again, no substantive reasons are provided. Also, the recommendations in the Helicopter Assessment offered mitigating actions, including no investment in facilities to encourage helicopter activity; revising lease terms, including rates, payments and renewal terms, as well as insurance requirements could be used to influence helicopter activities. There is no discussion in the NCP report of pursuing any of these actions to influence noise mitigating decisions by helicopter operators.

4.3.6 Rejects the establishment of voluntary alternate pattern training for helicopter training. The text in this section is inaccurate and not representative of the extensive discussions in both the TAC and the CAC.

- First, the section states that “The Advisory Committees noted that the number of overflights occurring over the residential areas off the ends of the runway would not change, which areas are most impacted by the overflights.”
- That assertion was made by the helicopter flight school owner and other airport-related members, but was challenged by other members of the committee, including myself. Many of the overflights over Atlantis are not “off the ends of the runway”. We suggested alternative areas where flight training could be conducted away from residential areas; establishing staggered patterns at different locations to avoid constant overflights for hours on end and the elimination of sequenced pattern training. None of these suggestions are reflected in the NCP report.

- Second, the section states that “the helicopter flight school also indicated that implementation of this measure may introduce additional safety concerns since it would be more complicated to ensure the separation of multiple training patterns occurring at the same time.
- That assertion is not only unsupported by any facts, but also is refuted by the Helicopter Assessment Report which states that limiting the number of helicopters in the pattern at one time would not only reduce noise, but “...limiting the number of these types of activities will also improve safety due to the resulting reduction of pattern congestion. “
- Repeated helicopter pattern training over residential areas for hours at a time, including multiple helicopters in the pattern, is the fundamental issue that LNA neighboring residents wanted to have addressed by the County.
- As noted above in the multiple references to the Helicopter Assessment Report, there are many levers the County can pull to influence helicopter behavior without running afoul of grant assurance restrictions. These measures should be pursued as part of a balanced approach to addressing the positions of residents and airport stakeholders on noise issues.
- Also, mere assertions by the helicopter flight training school without substantive, factual support should not be the basis upon which the County adopts or does not adopt noise mitigating measures. The fact that the suggestions of members of the TAC AND CAC who were not aviation affiliated have not been reflected in the NCP is problematic.

Section 6 of the NCP discusses Program Management measures that would enable PBCDOA to monitor the implementation of the final measures that are ultimately included in the NCP.

6.1.4 Discusses Advisory Board and Pilot Briefings by PBCDOA. This measure should describe a proactive, ongoing effort by PBCDOA to ensure that, consistent with the recommended Pilot Procedures discussed in Section 4.2.4 above, pilots are updated on current best practices that they should be following in their respective LNA operations. They should also be advised how operations over residential areas will be tracked and identified under the updated ANOMS.

6.2.2 Discusses the updated Noise and Operations Management System (NOMS). As discussed above, the NOMS must provide a transparent, data-driven, user friendly technology with public interface features that were outlined in our comments on the development of the ANOMS RFP. As all measures are voluntary, a data-driven, fact-based identification of operators who do not adhere to noise abatement protocols is required so that they can be clearly identified and reminded by the PBCDOA of the operational behavior that is representative of being a good neighbor. ANOMS output should be integrated into the processes identified in Section 6.1.4 and Section 6.2.5

6.2.5 Recommends establishing a Citizen’s Committee comprised of LNA stakeholders to meet on an established schedule to discuss noise-related LNA issues. This section should provide for the use of the updated ANOMS in these discussions and allow stakeholders to provide input on operating changes and investment decisions that potentially will increase noise levels.

In closing, as discussed above, many of the recommended changes in the NCP will not reduce noise impacts on communities adjacent to LNA. In fact, they may increase noise levels and are inconsistent with past initiatives and studies to strike the right balance between airport operators and residents who are subjected to unreasonable, intrusive noise levels in their communities.

Given the adverse impacts many of the recommendations in the Draft Part 150 Report would have on LNA adjacent communities, they should not be finalized without input from the Technical and Advisory Committees. The PBCDOA should reconvene those committees to discuss the deficiencies in the recommendations and attempt to reach a consensus on how they can be addressed.

Sincerely,



Allan Kaulbach  
Mayor

CC: Commissioner Michael Barnett  
Commissioner Gregg Weiss  
Robert C. Mentzer, Principal Consultant, Project Manager, HMMH

Attachment: Appendix A

**APPENDIX A**  
**RESIDENT COMMENTS**

My parents built their house on French Royale Circle 52 years ago on the lake across from the airport. We used to think

It was fun watching the planes flying overhead. They never seemed to be as noisy as they are now. We never minded them when our Florida room was screened in. Now we have hurricane windows in that room and can't open the windows when we eat dinner out there because of the constant noise. I haven't sat on my patio overlooking the lake for the last two years because of the never ending noise. I didn't think they were allowed to fly at night but they do now and they even fly late at night. When we are at the pool you have to stop your conversation when a helicopter flies overhead. They are so noisy and constantly go back and forth over the pool. I read that airport is the busiest one in the county and it does not have a control tower.

I would hope some accommodations can be made to improve our quality of life.  
Thank you for your attention to this matter.

**Dianne Darche' Dowling**  
**Sent from my iPhone**

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Thank you for all the information you have sent to us regarding the airport noise issues. There has been a dramatic change in the noise levels over our French Royale Circle Community. The helicopter training flights are especially loud as they are flying lower and appear to be more frequent. I realize that takeoffs and landings are determined by the weather conditions and the wind direction but would ask that they look into options to try to diminish disruptions to our community. Thank you.

**John J Dowling MD**

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We find it very difficult to ever sit outside. My elderly mother, age 94, gets agitated and concerned every time a plane crosses over our yard in Atlantis. One time she was so startled by a helicopter noise that she lost her footing and almost fell. The sounds from the helicopters, especially, are constant and have negatively affected our ability to sit outside and enjoy our own backyard.

**Lori Adams**  
**French Royale Villas**

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Thank you for your support of attempting to minimize the air traffic at the Lantana airport. The noise from air planes, and especially helicopter traffic, seems to be getting worse.  
Any way to limit this noise pollution would be greatly appreciated.  
Thank you

**Greg Adams**  
**399 Villa Drive South**  
**Atlantis**

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Dr. Colathur and Mrs. Viji Palani would like to lodge a strong protest to the changes made that allows noisy aircraft to use this airport next to Atlantis. These include helicopters, and jet aircraft. The frequency of use and times of use are causing intolerable living experience. Activities such as conversation have to be halted until the offending aircraft passes, which can be a long while. Constant exposure is likely to lead to permanent hearing loss in addition to long standing stress and it's consequences to health. So far the responses of the decision makers are sending a message asking us to accept this assault. I invite the decision makers to come and experience this assault on our health and wellbeing. Maybe then, there'll be a sympathetic response to this issue.

Thank you,

**Dr. Colathur and Mrs. Viji Palani**

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Way too often I have to go inside when guests are here because we cannot converse at all. It is too loud due to the helicopters plus they fly too low which is a huge safety concern. From what I understand, these are students without experience, which certainly raises the alarm for safety issues when circling residences and flying so low. And the helicopters often circle around the same area for a period of time.

I have lived in the City since 2001 and the problem has increased dramatically in recent years. Even when inside, there are times when you can hear the helicopters and even the jets, although I do have hurricane windows and doors.

At the pool, I have similar issues with low flying and loud helicopters. The flight patterns always seem to be over residences. This is really not an acceptable way to live when you can't enjoy your own patio and garden because of the loud noise and concerns for safety.

**Nancy Rugus**  
**387 Villa Dr S**  
**Atlantis, FL 33462**

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\*\* Sometimes when we are out walking an airplane will come flying in so low and so loud we actually duck  
\*\*There seems to be a frequent pattern around noon to 1:00pm weekdays where a number of airplanes fly in to land. If the weather is nice we have our front door open. We end up having to close the door because it is impossible to hear the television over the airplane noise.

\*\*We do not know if there is a quiet time during which the planes cannot take off or land but there are times in early morning 6:30 am or 7:00 am when planes fly over our house. The noise at any hour is disturbing but truly unsettling at such an early time.

**Elaine and Deniss Ottley**  
**398 French Royale Circle**  
**Atlantis, FL 33462**

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To Whom This May Concern:

As a seasonal resident of the French Royale Villa group in the City of Atlantis, my husband and I have enjoyed spending our winters in this community. However, in the past few years, we have become deeply concerned about the lack of respect for those who are neighbours of the Lantana airport.

As we are Canadians and have had to return to Toronto, we are unfortunately not able to be in attendance to show our support for the work being done by the City to express our concerns.

Specifically, our villa is often directly under the flight path of landing airplanes. The lights from the aircrafts of all types and sizes can be seen at all times of the day and night from our living room window flying directly at us AND VERY LOW. The overhead noise, coupled with the fear of "what if" (their landing gear jams or something happens while flying overhead), is most concerning to us.

In addition, it is impossible to speak to anyone outside or at the pool when planes are flying over, as well as when the helicopters do their training overhead - usually at cocktail hour, when neighbours are trying to carry on an outdoor conversation.

We believe this intrusion on what used to be a beautiful, quiet and cleanly-kept community will seriously diminish the value of all of our homes in Atlantis, and especially in French Royale Villa. We do not want this to happen and appreciate the efforts our City Council and active residents are taking to ensure that Atlantis will continue to be the preferred choice of residency for full time as well as seasonal residents for many years to come.

**Sincerely,**  
**Lynn & Duncan McGregor**  
**Toronto Ontario, Canada**  
**416-451-2248**

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1. Many times I have had to bring my guests indoors , on a lovely Florida afternoon, as the noise is totally overbearing.
2. Helicopter traffic and diminished heights are unacceptable, other areas with no homes are easily accessible.
3. I have lived in Atlantis for 20 years , I was well aware that an airport was close by , however the increased noise , especially from the helicopters , is making living in my beautiful city harder and harder to enjoy my home.
4. I am totally against any jet traffic , as I feel the runway length is insufficient in case of an irregular operation.

**Carol Patmore**  
**403 French Royale Villa**

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- Could not converse with contractor outside to discuss patio project due to loud whirring of hovering helicopter
- Guests on patio forced to move indoors due to loud noise preventing regular conversation
- Unable to enjoy peaceful activity of gardening due to loud noise of overhead helicopter.

**Sandy**

**A.G. Rhind**  
**President**



181 University Avenue, Suite 1414  
Toronto, Canada M5H 3M7  
Tel: 416 471 4043

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Thirty-five years ago we lived in Lake Osborne Estates, where a plane from Lantana flew into a carport on Lake Osborne Drive! One evening our very active neighborhood occupants were invited to a presentation about the new helicopter school. After much testimony from homeowners, the presenter said it is no use to fight it, because it is coming anyway. They did not really bother us at the time, but we were working all day.

We moved away shortly after school was in session (helicopter school) but returned to Atlantis 15 years later. We lived on Villa Drive South where the low-flying planes were frequent and loud enough on weekends to seriously impair our enjoyment of the weekends. We installed hurricane windows and doors all around and were relieved to be able to relax and enjoy our home.

However, being outside in the pool was just impossible and still is. You cannot carry on a conversation without pausing for the planes to pass, one after the other. As I understand it, the two week noise study consisted of four large microphones were installed in Atlantis to measure the noise in the daytime only. I guess the results were inconsistent, since nothing has changed. So now we have jets! Yikes! Where is Bruce Pelley when we need him. I remember reading in the paper that there would be no jets in Lantana as long as he was Director of Airports! How was he able to prevent them? Maybe we should give him a call.

**Carol Hansen**  
**Atlantis, FL**

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I am unable to hear my TV. Or sleep in bed after 6 AM Due too. Flights across my roof at a very low altitude. Continues until 8 9 pm. I fear a crash on my roof from those learning to fly.. I feel my home is in danger and my life At 95 and alone , I fear for my home and my life. I find no place to , hide from my fears. I also believe this noise devalues my property. Much change is vital to our peace and tranquility.

**Merle Zamboni**  
**Atlantis, FL**

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While I am out of time and cannot attend the meetings, please be assured that I am in total agreement with you regarding the airport problems. Unable to talk on the phone, have conversations with others, inside or outside. Hearing instructions from my health aide also impossible when those directions are detrimental to my health. The noise from aircraft is beyond control and safety from low flying planes and helicopters is frightening. Please help us here in Atlantis so we can live a safe and noise controlled environment.

**Marie Tynan**  
**379 Villa Dr S,**  
**Atlantis, FL 33462**

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The constant noise from helicopters, jets and loud planes flying over our City of Atlantis has greatly decreased our quality of life here. It is nonstop from morning to night , the patterns of the aircraft zooming back and forth is ear shattering and with these low flying planes and jets. It's just a matter of time, not if but when, the next catastrophe will happen.

**City of Atlantis resident**

**Robert C. Mentzer**

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**From:** Amy M. <cupidsdesire04@gmail.com>  
**Sent:** Friday, June 7, 2024 11:53 AM  
**To:** LNAPart150  
**Subject:** Public Comment

[EXTERNAL]

Good Afternoon,

I live in the area that would be affected by the recommendation to use runway 4/22 more often. And it would get used so much more if there was a better taxi lane constructed, as also proposed. I understand that this reduces the noise over Atlantis and Lake Osborne Estates, however it now increases traffic over my neighborhood of ROLO. There are already a lot of planes that come overhead, some of them flying VERY low. It causes me extreme anxiety at times. If you are moving forward with the recommendation to use this runway, I would ask that **planes stick to flying over the lake as much as possible**. And if they do have to fly over the neighborhoods, that they do so at a **higher altitude**. We also have veterans in our area who are similarly affected by the loud low-flying planes. Thank you for your consideration.

Amy Mihelich  
2032 Collier Ave, Lake Worth, FL 33461  
561-308-5126

**Robert C. Mentzer**

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**From:** Mary Adam <mary2t@hotmail.com>  
**Sent:** Friday, June 7, 2024 11:35 PM  
**To:** BCC-All Commissioners; Laura Beebe; Robert C. Mentzer; LNAPart150  
**Cc:** William Coakley; Allan Kaulbach; Bill Harsh; donald stewart; Maggie Sarubbi; Ron Haines; Roger Manning; kkss21; Larry Silver; Arthur P. Villwock; Larry Silver; JuneMBingham@yahoo.com; Tara Maule; taylorrose0308@outlook.com; djdepanicis@gmail.com; Renee Frost; terry lynch; William Coakley; Larry Silver; Tara Maule; JuneMBingham@yahoo.com; Allan Kaulbach; Bill Harsh; Ron Haines; Brian Moree; Maggie Sarubbi; donald stewart; kkss21; Shanon Pretel; Joe LoBianco; janeshu@ymail.com; Henry Pawski; bobxyz58@gmail.com; exit39@gmail.com; Paul Mozen; JAMIE FOY; bill &cathy musgrave; Bill Taylor  
**Subject:** Re: Comments on Part 150 LNA Study Draft - due June 7, 2024  
**Attachments:** COMMENTS ON PART 150 DRAFT STUDYa.pdf

**Follow Up Flag:** FollowUp  
**Flag Status:** Flagged

[EXTERNAL]

Good evening everyone,

I hope this email finds you well.

Firstly, I want to extend my sincere gratitude for Mr. Coakley's efforts in compiling this document on behalf of the Association and Community of Lake Osborne Estates. It's evident that a considerable amount of time and dedication has been invested, and his commitment to this project is greatly appreciated.

I would like to contribute a suggestion for consideration as HMMH finalizes the study. It would be beneficial to include the minutes and transcripts of the meetings conducted throughout the years, specifically for the purpose of this study. These minutes would provide valuable insight into the discussions, comments, and suggestions made by both members and members of the community. By incorporating this information, we can ensure transparency and a comprehensive understanding of the factors that should be influencing the study's outcomes.

Also, it is essential to clarify our position regarding any proposed extensions to runway 4/22. We are not in favor of extending the runway but rather advocate for bringing the runways to an equal appeal and quality as runway 10/28, therefore potentially encouraging further use of 4/22, and mitigating noise.

Which brings me to the point of an addition of a taxiway on 4/22. We must emphasize our preference for the placement of a future taxiway for runway 4/22 on the east side. We only see the justification for placement of a taxiway on the west side, in the context of potential future development, which we firmly oppose.

We trust that you will consider these comments as integral to the Part 150 study's finalization. Our aim is to ensure that the outcomes of this study align with the needs of the surrounding communities, to regain balance with the airport interests.

Finally, I wanted to note that we have reviewed the comments submitted by The City of Atlantis and are in full agreement with the points they have raised.

Thank you for all the hard work put into this project.

Mariette (aka Mary) Adam de Villiers, President  
Lake Osborne Estates Civic Association, Inc.  
Cell 954-232-0031

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**From:** William Coakley <wdcoakley@gmail.com>

**Sent:** Friday, June 7, 2024 1:00 PM

**To:** BCC-All Commissioners <BCC-AllCommissioners@pbcgov.org>; Laura Beebe <lmbeebe@pbia.org>; Robert C. Mentzer <rmentzer@hmmh.com>

**Cc:** Allan Kaulbach <AKaulbach@atlantisfl.gov>; Bill Harsh <billharsh@gmail.com>; donald stewart <donald.c.stewart@hotmail.com>; Mariette Adam de Villiers <mary2t@hotmail.com>; Maggie Sarubbi <maggiesarubbi@gmail.com>; Ron Haines <ronaldhaines@bellsouth.net>; Roger Manning <roger@banyanprinting.com>; kkss21 <kkss21@bellsouth.net>; Larry Silver <larry@iimore.com>; Arthur P. Villwock <artvill0507@aol.com>

**Subject:** Comments on Part 150 LNA Study Draft - due June 7, 2024

**Robert C. Mentzer**

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**From:** Susan Nestler <suenestler@yahoo.com>  
**Sent:** Friday, June 7, 2024 11:50 PM  
**To:** LNAPart150  
**Subject:** Lantana airport concerns

[EXTERNAL]

Hello— as a resident of Murry Hills, I am directly affected by safety and noise issues at Lantana airport. The noise has increased exponentially since I moved here six years ago, with the changing of flight patterns and introduction of jets. Sometimes I count the number of planes and they come at a rate of every 10 seconds. The noise is deafening from low flying planes and jets.

There are also safety concerns, with several small planes crashing near my residence. It is only a matter of time until one crashes into one of the senior communities nearby. With the huge increase in air traffic due to the flood of new residents in S Florida, there is a corresponding need for greater safety precautions such as an air traffic controller. I believe that jets are not appropriate for an airport of this size and talks should be held with the FAA to resolve the issue.

Finally, John Prince Park is an idyllic place for local residents to enjoy nature and the many beautiful waterfowl and other wildlife. It is being spoiled by the noise pollution, which studies have shown is harmful to people's physical and mental health. Personally, I find myself stressed and unable to relax due to the constant air traffic. As result, I will likely be forced to from my residence.

Sincerely,

Dr Susan Nestler  
Clinical Psychologist

[Sent from Yahoo Mail for iPhone](#)