

## **Reasons Why the Published Load Capacity based on *Engineering Specifications* for the Main PDK Airport Runway (2R/20L) Must Remain at the Present 66,000 lb. Rating:**

**Preliminary Note:** The issue in question is not about a weight limit at PDK. The issue, instead, relates to a request by Airport staff to change the designation of the County's published physical load-bearing capacity for the main PDK runway from 66,000 to 75,000 pounds. The document at issue--the 2010 PDK Airport Layout Plan--is a formal document that is relied upon by pilots across the United States and the World to know the actual engineered load-bearing capacity, not the airport staff's wish list for a bigger airport. The issue is not the runway's potential to occasionally accommodate heavier planes, but the actual physical engineering specifications of the runway.

As Marc Sorenson--the only registered structural engineer to communicate with the BOC on this issue--stated in his letter dated May 12, 2010 [*See Attachment #1*], the engineered capacity of the runway is what is in question, not a hypothetical question about what the heaviest aircraft is that could ever use the runway. This is not about the weight limit argued for years by the community. It is about engineering realities. We have the 1975, 1985 and 1993 layout plans, all of which show a 66,000-pound load-bearing capacity for the main runway. Nothing has been done physically since the last ALP in 1993 that could raise that load-bearing capacity. So the staff's proposal to arbitrarily increase the published load-bearing capacity would simply be putting out false information to the public.

At the May 25, 2010 Board of Commissioners meeting--in an effort to justify the proposed increase from 66,000 to 75,000 lbs. aircraft--PDK Acting Director Mike Van Wie brought out a purported "study" done 12 years ago in 1998, at the request of then-Airport Director Lee Rimmel. Mr. Van Wie claims that the document supports an increase from 66,000 to 75,000 lbs. But the document that Mr. Van Wie is asking the BOC to rely upon is not a study at all. It is an answer to a carefully-crafted hypothetical question: Could a 105,000 pound aircraft use the runway without cracking it immediately? [*See Attachment #2*]. In 1999 former airport director Lee Rimmel unsuccessfully tried to use that same document--which he also incorrectly referred to as a "study"--when seeking to get the FAA and the GA DOT to increase the published load-bearing capacity of the runway. **Both the FAA and the GA DOT rejected the purported study as a reason to increase the published load-bearing capacity for the runway.** [*See Attachment #3*]

Apparently that rejection has not stopped the airport staff from once again presenting the rejected document to the BOC on May 25. Apparently the airport staff is hoping that since no one currently on the BOC today was on the BOC in 1999, the BOC and the community will have no institutional memory that this document was previously rejected. As the FAA noted, in an internal email generated by Mr. Rimmel's request to increase the published load-bearing capacity using the same LPA letter that Mr. Van Wie used on May, nothing has physically changed on the overall capacity of the runway. But Mr. Van Wie has trotted out the failed hypothetical query of staff to try to justify publishing false information about hard engineering facts. The LPA report relied upon by Mr. Van Wie does not change the engineering realities, and it thus does not support changing the published load-bearing capacity from 66,000 to 75,000 lbs.

*The Board of Commissioners must amend the proposed 2010 PDK Airport Layout Plan proposed by airport staff, so that it accurately describes the 66,000 lb. engineered load capacity of the main runway (2R/20). A vote to approve the ALP in its current form, as proposed by staff, is a vote to put out false information about the load-bearing capacity to the public.*

## II. Improper Increase in the designated “Critical Aircraft”

There is one other amendment that needs to be made to the proposed 2010 ALP. The choice of the “Critical Aircraft”--or typical aircraft--to use to study operational changes at the PDK has been increased by staff to a Gulfstream III from a Gulfstream II. The proposed 2010 ALP uses a Gulfstream III as the typical aircraft using PDK for purposes of analyzing airport operations. That is a big change from the prior critical aircraft, a Gulfstream II. The Gulfstream III jets proposed by staff as the typical PDK aircraft have certified maximum take off weights of 66,000 to 69,000 lbs. The smaller Gulfstream II jets have certified maximum take off weights well below the 66,000 lb. limit.

If the BOC approves the Airport Layout Plan without amending the Critical Aircraft to be a GII instead of GIII, the BOC will be voting to increase the regular, expected use of PDK by larger aircraft when the environmental impact of which has **never been studied**. The only environmental analysis done at PDK involved only the smaller jets with certified maximum take off weights of 66,000 pounds or less. If the Board votes to use the heavier Gulfstream III as its typical aircraft, that will be in violation of federal environmental laws and will open the possibility of litigation on that issue. But more importantly, the BOC will have invited larger aircraft about which it knows nothing to use PDK, with unknown impact upon the health and safety of hundreds of thousands of DeKalb County residents. Children are the population most impacted by the air and noise pollution from PDK.

### **Supporting Points and Attachments:**

1. The previous PDK Airport Layout Plans for 1975, 1985, and 1993 all list the engineered load capacity of the main PDK runway (2R/20L) at 66,000 lbs., dual wheel. Mayes, Sudderth & Etheredge, Inc.--the engineering group hired to build the extension to the main runway in 1987--was directed to build the extension to a 66,000 lb. load capacity. Documentation that this was done is provided by the core samples that were taken of the extension [See Attachment #4 reporting on the core sample results and Attachment #5 with the engineering report of October 1, 1987].
2. Since the 1,000-foot extension to the main runway in 1987 was built to a 66,000 lb. load capacity and since that extension is used routinely as part of the main PDK runway (2R/20L), the *entire* 6,000+ foot runway must have a rating of 66,000 lbs., no matter what the strength of the prior, 5,000-foot portion of the runway may have been. [See Attachment #6].
3. As mentioned above, the 1998 LPA report that was submitted to the FAA and GDOT to support increasing the stated load capacity of the main PDK Airport runway (2R/20L) to 75,000 lbs. was *denied* by the FAA and the GDOT, and PDK Airport was instructed to reverse its description of that runway capacity back to 66,000 lbs. [See Attachments #3].

4. Although the 2009 “slab replacement project” did overbuild about 10% of the current main runway to a 75,000 lb. capacity, as structural engineer Marc Sorenson notes, that overbuilding of *a portion* of the main runway did not invalidate the fact that the structural rating of the main runway remains at 66,000 lbs. The engineering rating of a runway (which is what is being indicated on the ALP) is based upon the *lowest* engineered portions of a particular runway, not on the highest portions [See Attachment #6].
5. The 2010 ALP also incorrectly indicates that the “critical aircraft” used to determine the maximum size of planes routinely using PDK has been changed from the Gulfstream II jets, which are under 66,000 lbs. MTOW, to the Gulfstream III jets, which may be more than 66,000 lbs. MTOW. Therefore, before passing the 2010 PDK Airport Layout Plan, the Board of Commissioners must amend it so that the ALP continues to show that the critical aircraft using PDK Airport remain under 66,000 lbs. as is officially the case at present.
6. The Public Hearing on the ALP that was held at the Board of Commissioners meeting on May 25, 2010 did not follow standard procedure for holding such a public hearing. Individuals who wanted to speak *in opposition* to the proposed 2010 PDK Airport Layout Plan were instructed to speak *first*. Then a supporter of the proposed ALP, Mr. Van Wie, was asked to make his case. He proceeded to introduce a new document *that he had not previously provided to either the Board of Commissioners or to Mr. Sorenson and the concerned public*. No opportunity was offered to the concerned public to respond to that new document.

Since the May 25, 2010 Board of Commissioners Public Hearing was not conducted in accordance with normal BOC procedure and since the public was not given an opportunity to respond to additional new information that Mr. Van Wie introduced at the last minute at that hearing, the Public Hearing on the 2010 ALP should be *reopened* so that concerned citizens can have the opportunity to make the case in refutation of the erroneous arguments presented by Mr. Van Wie.

***In conclusion***, before passing the proposed 2010 PDK Airport Layout Plan, the Board of Commissioners must amend the plan so that: (1) the ALP accurately reflects the engineered level of the current primary runway (2R/20L) and (2) the ALP accurately reflects the “critical aircraft” (Gulfstream II) that is allowed to routinely use the main runway.

Thank you for your careful consideration of these important matters that call for amendment before the Board of Commissioners approves the 2010 PDK Airport Layout Plan.

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Board of Directors