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Via facsimile (770) 263-9145, confirmation by US Mail

Mr. Jim Duguay  
Manager, Aviation Planning  
The LPA Group Incorporated  
3595 Engineering Drive  
Norcross, GA 30092

Re: DeKalb-Peachtree Airport ("PDK")  
/ Departure Procedures Environmental Assessment (the "EA")

Dear Mr. DuGuay:

We write to submit comments on the EA. Our comments deal primarily with the data used in the EA to assess noise impacts surrounding PDK and used to conclude in the EA that the proposed federal action will not have an impact on air quality or other environmental concerns. As fully discussed below, the EA does not accurately describe the data on which the EA's conclusions are based. Further, the data that was in fact used is deeply flawed and does not present an accurate picture of aircraft operations at PDK. As a result, the EA is unreliable and unacceptable.

The Erroneous Description of Data is Misleading and the Data Used is Not Representative

A faulty EA cannot support a FONSI. The purpose of the EA is to allow the FAA to make an *informed* determination as to whether implementation of the proposed departure paths would cause a significant impact on the human environment; or if the proposed departure paths *cumulatively with prior FAA or DeKalb County actions* would cause such an impact. See, e.g., FAA Order 10501E. Public commentary is a central part of this EA process and we appreciate your having talked with us at the public exhibition of the EA on October 11, 2005. Unfortunately, reading and rereading the EA even after that conversation did not provide us the ability to understand the data relied on in the EA or the conclusions reached there from. As a result, we requested and received from you last week materials outside of the EA, the detailed backup information that was used to create section 5, Environmental Consequences. One of us is a data and database analyst by profession and the other an attorney. We have studied the EA and the back up detail and have discerned that the data described in the EA is not in fact the data input into the INM noise model or relied on to summarily conclude that there will be no other impacts on the human environment.

According to the EA, INM model impact factors for the analysis included without limitation, "Time of day/night operations; Stage Length of aircraft; Runway orientation and Use;

and, Existing and future aircraft operations and fleet mix.” EA, page 5-1. “The [INM] database further includes performance data for each aircraft type [using PDK]. These data allow the model to compute airport-specific flight profiles (rates of climb and descent) for each aircraft type, providing an accurate representation of aircraft in flight. . . . Table 5-1 lists the different types of aircraft found at the airport during the study period ... .” EA at p. 5-1.

The source of data and method of collection is as follows, according to the EA:

PDK ATCT flight strip data was collected for 33 days during the months of March and April, 2004. Throughout this timeframe, observers were intermittently placed in an observation tower at PDK to monitor actual aircraft operations. . . . Information was also gathered from the NOMS to use as a cross reference for the data collected from the flight strips and visual observations.

EA at p. 4-3

But when we looked *outside* of the EA, at the back up spreadsheets with which you provided us last week, the study period is explicitly identified therein as March 28, 2004 through April 30, 2004, excluding April 15 or April 22 (the “Stated Period”). See Appendix 1 hereto. Worse, when one digs deeper into the back up spreadsheet by clicking on its “detail” tab and scrutinizes the disorganized data therein, one may discern (with enough analysis) that the data was in fact collected from March 26, 2004 through *only* April 25, 2004 and calendars days April 12, 13, 15, 16, 20, 21, 22 and 23 were completely omitted. (This collection period will hereinafter be referred to as the “Actual Period”). Nothing in the EA reveals the true source of the data on which the EA’s conclusions are based.

Further, the actual data used were collected for various limited times of day on various days. See table entitled, “LPA Day and Time Use,” attached hereto as Appendix 2. There is no mention in the EA of that fact, much less identification of the times and days selected for inclusion. The EA reader would have been instructed that operations from 33 days went into the analysis described in the EA on page 4-3, resulting in Tables 5-1, 5-2, 5-3, 5-4 and 5-5. If the public reader thought to go outside of the EA and knew how to do so, he would then understand from the spreadsheet that March 28-April 30, minus April 15 and 22, (the “Stated Period”) were used. But only if he was spreadsheet savvy and clicked on the detail tab would he understand that the County actually selected limited time periods on various days over a 23 day period.

#### Problems With the Dates and Times Selected for Inclusion

Assuming that it is not a fatal flaw to have failed to accurately describe to the FAA and to the public the County’s methodology and sources of data collection, an analysis of the data actually used shows that it is not an accurate representation of operations at PDK in terms of number of operations, times and types of aircraft. Ten (10) of the days from which data was selected are weekend days, 44% of the total days input into the INM. See Appendix 2 hereto. There is no discussion of that fact in the EA, nor any indication anywhere that weekend days are representative of aircraft operations at PDK in general. In fact, a review of flight operations captured in the Flight Event List, a report from the TAMIS system at PDK, for the Stated Period shows that operations differ substantially between Saturday and Sunday usage and Monday

through Friday usage. See Table entitled “EA Fleet Mix Daily Use – Summary (TAMIS) Report,” Appendix 3 hereto. Each of the weekdays, Monday through Friday were busier on average than were Saturdays or Sundays during the Stated Period. So the de-selection of weekdays in favor of weekend days underestimates the amount and type of traffic. The percentage of IFR traffic (usually larger aircraft) to VFR traffic is higher on weekdays than it is on weekends, by a large margin. See Appendix 4 hereto.

A review of the Actual Period used by the County, but adding back in the calendar days the County de-selected shows the same result, that the selection of weekend days over week days artificially moved down the number and types of operations. See Table entitled “EA Fleet Mix Daily Use – (TAMIS) Report Actual Period,” Appendix 5 hereto.

Friday afternoons (noon to 5:00 PM, using LPA’s time periods) were excluded for the ENTIRE Data Period and as a result do not factor into the INM model at all. See Appendix 2.

Night operations are substantially *under-included* in the data actually used in the EA. See Appendix 2. That is truly significant in that night operations had a 10 dBA penalty in the INM. EA, page 5-3. Night operations are defined in the EA as occurring between 10:00PM and 7:00 AM. EA, page 5-3. The County did not include data collected for that continuous period of time at all, opting to include an hour here or there from the period on various noncontiguous days. The described data used and the actual data used differ and the actual data was carved up in such a way as to make it not representative or reliable as an indicator of operations at PDK. By way of example, the backup detail shows that operations occurring after 6:30 AM on five (5) days in March were included, but numerous night flights on those same calendar days were not included. See Appendix 2.

#### The Fleet Mix Was Artificially Distorted

You informed us on October 11, 2004, that you had added a DC-9 to the fleet mix although it had not turned up in the data collected because you knew PDK Watch had publicized a picture of such an aircraft parked at PDK. Although we appreciate the gesture toward inclusion of larger aircraft, we would have preferred a thorough use of the information readily available from the NOMS. In sharp contrast to the DC-9’s inclusion, although there were 28 operations by Boeing 707, 717, 727, 737, 757 and 767 aircraft (with maximum take off weights ranging from 257,000 lbs. to 351,000 lbs.) during the Stated Period, but none of those aircraft are included in Table 5-1 and thus were not included in the analysis. See Table 5-1, EA, page 5-2. Another example shows that there were 8 operations by massive Boeing Stratotanker KC-135s during the Stated Period, but that aircraft is not included in Table 5-1 or the analysis.

#### Existing NEPA Documentation/ The 66,000 lb. MTOW Limit

In fact, there were fully 268 operations of aircraft with MTOWs in excess of 66,000 Lbs. at PDK during the Stated Period and 257 in the Actual Period. The EA cannot be legally sufficient, given that it accepts the use by PDK of aircraft in excess of the 66 lb. limit (“Oversized Aircraft”) and does so without a single mention of that limit and the prior National Environmental Policy Act (“NEPA”) documentation that relies so very heavily on the weight limit as a environmental mitigation measure and condition of funding and approval. DeKalb County and the FAA must acknowledge and work within the previous NEPA documentation

regarding PDK, including complying with the 66,000 lb. MTOW limit on aircraft relied on in the FAA's FONSI and ROD issued in 1987 in connection with the lengthening and establishment of a displaced threshold on runway 2R-20L.

We acknowledge that the proposed departure paths, if used exclusively by aircraft with MTOWs of 66,000 lbs. or less, would not likely cause a significant impact on the human environment. We submit our concerns on this EA because it is misleading, largely inaccurate and because it assumes the propriety of a fleet mix that includes Oversized Aircraft. We strongly suggest that DeKalb County make the Airport safer and environmentally compliant by adhering to the weight limit and the displaced threshold and redesign the departure paths using GPS coordinates to provide maximum relief to all areas, South and North, impacted by Airport operations.

Thank you for your attention. We appreciate the opportunity to provide comments on the Final Draft EA. Given that we requested and received the back up detail only last week, there are no doubt other issues that we could present to you with regard to the data used in the EA. We are available to the FAA should they require additional information or clarification on any matters related to the data used in the EA.

Sincerely,

Susan Gouinlock

Mike Principino