

Will the BOC Allow Expansion of PDK Airport? Core Problems with the Proposed PDK Master Plan

DeKalb County owns PDK Airport. The FAA cannot dictate expansion of PDK, nor can the staff at the Airport. Only the DeKalb County Board of Commissioners (BOC) can approve any expansion of PDK Airport. Aircraft emissions are well-documented causes of cancer, respiratory illness, and negative health outcomes for children, while noise pollution negatively affects health and property values. These factors must be taken seriously in planning for the future of PDK, including in what is called the “Master Plan,” a periodic planning tool that is required by FAA of all airports. DeKalb citizens and their elected Commissioners have acted in the past to restrain efforts by Airport staff, supported by the Federal Aviation Administration (FAA), to expand PDK beyond its current role as an urban general aviation airport into a facility catering to large corporate jets. The DeKalb Board of Commissioners must continue enforcing that restraint now to protect the health and well-being of Dekalb residents.

PDK staff have been working since 2017 on creating a new Master Plan for the development of PDK for the next twenty years. That planing process is mandated by the FAA for future development and FAA funding. The working papers for the Master Plan currently underway forecast an unprecedented increase in the number of flight operations at PDK. They also incorporate an aircraft for planning purposes (the “Critical Aircraft”) that is already larger than is *legally* allowed to operate at the Airport. The Master Plan draft also proposes the largest expansion of the number and size of aircraft based in hangars or tie downs in the history of the Airport.

The DeKalb County Board of Commissioners will be tasked with approving or disapproving the PDK Master Plan when Airport staff bring it to the Board seeking approval. Because the Master Plan will have a huge impact on the health, safety, and well-being of DeKalb communities over the next 20 years, the BOC must reject it if it is presented in its current form and does not address the critical issues discussed below.

Issues:

1. There is a legal weight limit for aircraft operating at PDK that dates to the late 1980s. At that time, PDK attempted to extend the main runway by 1,000 feet. Concerned Dekalb citizens initiated a lawsuit demanding a federally required Environmental Impact Study (EIS), which could have cost millions of dollars and taken several years to complete. Dekalb County and the FAA countered, providing legally binding assurances to the 11th Circuit Court that the extension (a “displaced threshold”) was solely for safety for existing aircraft weighing 66,000 lbs. Maximum Gross Takeoff Weight (MTOW), the largest then using the airport. Heavier aircraft would not be allowed to operate at PDK in the future. Based on these assurances, the 11th Circuit Court said that since heavier aircraft would not be allowed, no EIS was necessary.

The proposed Master Plan has identified the Gulfstream 550 as its “Critical Aircraft,” around which future airport planning will be based. That aircraft, and others in its weight class, cannot *legally* use PDK Airport. The G-550 has a MTOW of 91,000 lbs., which is 25,000 lbs. more than

the *maximum* weight allowed by the legally binding assurances DeKalb County and the FAA gave to the 11th Circuit Court in 1988.

In addition, the Gulfstream 550 cannot *safely* use PDK Airport when fully loaded because it needs a longer runway.

The FAA should consider this as a limiting factor in the designation of the Critical Aircraft. The BOC should not approve the PDK Master Plan if it uses a Critical Aircraft that violates the legally binding assurances DeKalb County and the FAA made to the 11th Circuit Court.

2. The projected PDK increase in flight operations over the next two decades is unrealistically high and cannot serve as a credible basis for planning for PDK Airport development. Although the past decade has actually seen a decline in the number of annual flight operations at PDK, this new Master Plan forecasts an unprecedented increase in the *number* of flight operations and in the *sizes* of aircraft using PDK. It incorporates an Average Annual Growth rate (AAG) for operations that is more than three times the FAA's forecasted AAG. PDK's Master Plan AAG, compounded annually over the next two decades, results in exaggerated growth predictions that are being used to justify the largest expansion of aircraft storage capacity in PDK's history. In addition, building more tie-downs and hangars creates its own demand for operations, to the detriment of Dekalb citizens: 'build it and they will come.'

Such highly unrealistic growth projections call into question the credibility of the entire PDK Master Plan, as well as its claim that it "must" have additional hangars and other types of infrastructure improvements to handle the supposed increased traffic it predicts.

3. PDK Airport also claims exaggerated economic benefits that its expansion will create for DeKalb County while ignoring the many negative impacts expansion is likely to have. Those negative impacts on tens if not hundreds of thousands of residents living near the airport include: additional noise and pollution with resultant health problems; decreased quality of life; and significant decreases in relative home values.

Who will benefit from expanding the PDK Airport, and who will not? The extent to which any increase in PDK flight operations or numbers of hangars and tie-downs is likely to have a significant positive impact on DeKalb County's economic development as a whole remains highly problematic. Simply expanding PDK operations for those few entities who can afford to own or use multi-million dollar jets ignores the greater potential negative costs inflicted upon the surrounding residential population due to noise and air pollution. The full impact of proposed PDK Master Plan improvements must first be carefully evaluated and any such analysis must be subject to independent peer review.

Without taking into account the potential negative as well as the positive impacts of the proposed PDK expansion, the Master Plan cannot be viewed as credible by the impacted public.

4. The PDK Master Plan cannot adequately be evaluated by the DeKalb County Board of Commissioners until either a full federal Environmental Impact Study (EIS) has been conducted or until the Environmental Study contractually agreed upon between the County and Open

DeKalb Inc. has been completed and the impacts fully assessed. That agreement was made jointly after the DeKalb County Commission did *not* approve the 2006 PDK Master Plan. The hope was to avoid costly litigation over an EIS and also to gain more information than an EIS might provide to aid the County in future planning for the Airport.

The Environmental Study seeks to determine the relative noise and pollution impacts at PDK of: (1) Aircraft 66,000 lbs. and under, (2) Aircraft between 66,000 and 75,000 lbs., and (3) Aircraft above 75,000 lbs. Open Dekalb and PDK Airport management, along with experts from the FAA, EPA, and GDOT, are nearing completion of the technical Statement of Work for an Environmental Study that should be completed within the next two years.

Any vote on whether to approve, modify, or not approve the PDK Master Plan must be deferred until a full Environmental Study has been completed and its results can be considered as part of the approval process.

5. There are many other problems with the proposed PDK Master Plan - and more will undoubtedly become apparent once the full PDK Master Plan and PDK Airport Layout Plan have been publicly released.

It is thus essential that sufficient time be allowed for thorough review by the Board of Commissioners and the concerned public of the PDK Master Plan and the PDK Airport Layout Plan after the documents have been released and after a full and credible Environmental Study has been completed and carefully reviewed.

To summarize:

- The “Critical Aircraft” for the Master Plan should reflect the 11th Circuit Court’s 1988 Decision that is based on the DeKalb County and FAA explicit representations to the Court and applicable environmental laws that impact federal funding for airport development.
- The Master Plan should scale back forecasts for future operations at least to the level estimated by the FAA.
- The Master Plan should evaluate the Airport economic impact both for benefits and for the negative costs on densely populated neighborhoods nearby.
- A valid and comprehensive environmental study is needed prior to any consideration of the Master Plan, either by completing a full Environmental Impact Study (EIS) or the Environmental Study currently in development.

For more detailed information on these and other issues with the PDK Master Plan, see the PowerPoint presentation available on the Home Page of PDK Watch Inc. at www.pdk.watch.org or email Larry Foster, Communications Director, PDK Watch Inc., at larry.foster137@gmail.com.

Supporting documents available upon request.

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