

**PDK Expansion Efforts + Five PDK Master Plan Problems:
Presentation to the DeKalb County Operations Committee on 12-29-2020**

Thank you very much, Commissioner [Larry] Johnson, for inviting concerned DeKalb County citizens, here represented by me [Larry Foster], to meet with the Operations Committee today to summarize some citizen concerns about both the way the PDK Master Plan *process* has been conducted and about the *substance* of the Master Plan itself (to the extent that it has thus far been made public).

Commissioner Johnson, we very much appreciated your comments at the August 18th BOC meeting that both the interests of the airport and the surrounding neighborhoods must be carefully considered in preparing the PDK Master Plan. Although the new PDK Master Plan strongly argues that an unprecedented PDK Airport expansion will be *great* for DeKalb County, it almost totally ignores the potential negative environmental impacts of such expansion on the tens of thousands of residents in long-established neighborhoods surrounding the airport. Today I'll primarily focus on some of the potential negative impacts of the proposed PDK Master Plan, while also recognizing that other proposals in the Master Plan are both necessary and desirable.

As previously indicated, I'm Larry Foster. I'll be wearing one of my many hats today as the Communication Director for PDK Watch Inc., a 501(c)4 citizen action group that for more than three decades has sought to mitigate negative PDK impacts on the surrounding neighborhoods and oppose types of Airport expansion that we feel might be damaging to residents near PDK Airport.

PDK Expansion Efforts and Community Opposition

Significant problems between PDK Airport and the residential community surrounding it began in the late 1980s when the Airport proposed to extend its main runway by 1,000 feet. This extension was described as purely a safety measure to provide a "displaced threshold" to prevent aircraft overruns, *not* as an extension that would allow routine use by larger aircraft. Concerned citizens nevertheless filed suit, alleging that an environmental impact study must first be conducted because the 1,000-foot extension would make it possible for larger and noisier aircraft to use the Airport.

Both DeKalb County and the FAA countered by submitting legally binding assurances that the 1,000-foot extension was only being built as a safety measure and that the existing 66,000 lb. weight limit would remain in effect at PDK Airport after the extension was built. Referencing those assurances, the Eleventh Circuit Court of Appeals in 1988 held that no environmental study was required since larger aircraft would not be using the "displaced threshold" extension.

During the next three decades, the existence of the 66,000 lb. weight limit was repeatedly reaffirmed in written County documents and correspondence. The core documents in question were summarized by Open DeKalb's lawyer, Susan Gouinlock, in a 44-page document that she

presented to Commissioner Rader earlier in 2020, available at:

https://drive.google.com/file/d/1Mn7emTcDBtjSkJExFY9Xsc-HbUdGb9_1/view?usp=sharing

A decade later in the late 1990s, PDK Airport secured an Airport Noise Monitoring System (ANOMS) that recorded flights and identified the aircraft. The public was initially told that the information provided by the system would be made fully available to them and that the information would lay to rest their concerns about larger aircraft using the PDK Airport.

Yet almost immediately after the ANOMS system became operational, the Airport and the County completely changed their minds and refused to release any ANOMS information to the public. After a five-year effort to secure access to the ANOMS evidence that culminated in an 18-month lawsuit, the concerns of Open DeKalb Inc. and the neighborhoods were fully vindicated in court in August 2005.

Meanwhile, a proposed PDK Master Plan was nearing completion in 2006. It stated that the Gulfstream 3 would be the Airport's "critical aircraft"--the aircraft around which further planning for the airport would proceed. That aircraft, however, happened to weigh some 8,000 lbs. more than the 66,000 lb. limit under which PDK had agreed to operate.

Eventually, the DeKalb County Commissioners did not approve the 2006 PDK Master Plan, in part because of the intense expression of public concern at the lack of any environmental analysis of the impact of encouraging use by larger aircraft, errors in the fleet mix and the Airport Layout Plan, and because of the threat of a possible lawsuit by Open DeKalb Inc. to enforce the 66,000 lb. contractual weight limit.

To try to overcome the impasse, in 2012 DeKalb CEO Burrell Ellis and some fifteen other officials from County government, including PDK Airport management, met with Open DeKalb Inc. After hours of reviewing the evidence for the existence of the weight limit, the CEO's office agreed that DeKalb had a problem if it wanted to allow use by larger aircraft on a regular basis. DeKalb County and the Airport agreed to fund a full environmental study (using Airport funds) of the relative noise and air pollution impacts of aircraft (1) below the 66,000-lb. weight limit, (2) above 66,000 lbs. but below 75,000 lbs. (a figure used in a DeKalb County ordinance), and (3) aircraft weighing more than 75,000 lbs.

In 2012 Open DeKalb Inc. and the County thus signed a "memorandum of understanding" under which Open DeKalb said it would not sue the County to enforce the weight limit if a legitimate environmental study were conducted, and if the noise and pollution levels of the larger categories of aircraft were deemed not significant.

To summarize a very long and complex set of issues that developed after the environmental study was approved and dragged on for the next six years, both PDK Airport Director Mario Evans and Open DeKalb Inc. eventually agreed that the study, which had been conducted by an Emory professor, totally failed to meet the contractual agreement with the County. The County did not want to get crosswise with Emory, so it did not pursue the matter further.

Because of this situation, Open DeKalb Inc. was promised by both the Airport Director and by his County superiors that a new environmental study would be conducted. Open DeKalb Inc. is currently in the process of negotiating with PDK Airport and experts from the FAA, EPA, and GDOT to put together a proposal for a valid environmental study that it hopes to have approved and sent out for bid by next year.

In the meantime, a new PDK Airport Master Plan process has commenced and now appears to be nearing completion. This time, PDK Airport has chosen as its “critical aircraft” the much larger Gulfstream 550. It is a jet that can weigh as much as 93,000 lbs., Maximum Gross Takeoff Weight (MTOW), or 27,000 lbs. more than the 66,000 lb. weight limit. The Gulfstream 550 cannot use PDK Airport without routinely making use of the 1,000-foot “safety” extension that the Airport and DeKalb County had promised would not be used for normal flight operations.

We thus are now back in the same place we were more than a decade ago when PDK Airport tried to secure approval for a PDK Master Plan using larger jets while the community insisted on first obtaining solid data about noise and pollution impacts of allowing such larger aircraft to routinely use PDK. To date no valid environmental study study has ever been done of the impact of allowing larger aircraft to use PDK Airport. Concerned citizens contend that such a credible environmental study of present and projected PDK Noise and Air pollution due to the introduction of more numerous larger aircraft must first be completed before the BOC will have the necessary information to determine whether or not to support the proposed drastic increase in numbers of larger aircraft at PDK Airport. PDK Airport now claims that a KB Associates Study of PDK Air Quality, dated September 2018, meets FAA requirements for the PDK Master Plan, but Open DeKalb Inc. contends that it is not a credible environmental study because it uses a mishmash of information from various locations over a twenty-four-year period to reach invalid conclusions.

Five PDK Master Plan Problems

Here are five significant problems with the Master Plan process and the Master Plan proposals that need to be considered carefully:

1. Lack of Transparency—During the first two years of the Master Plan process only one of the eleven Working Papers on the Plan was released to the Citizens’ Advisory Committee (CAC), even though that committee was supposed to be concurrently providing citizen input into the Plan. The first working paper projected a much *higher* demand for aircraft use of PDK during the next two decades than the FAA did, despite PDK’s overall *decline* in flight operations during the past decade. Two additional working papers totaling 78 pages, which had been completed a year or more before, were finally released less than 48 hours before the final public Citizen’s Advisory Committee meeting on December 10, 2020.

Such a late release obviously didn’t allow sufficient time for any meaningful citizen review. When asked by the public meeting participants to explain why the documents only were released at the eleventh hour, they were told that the papers were “too technical” for them to

understand, which is both an insulting and an untrue statement, especially since one-third of the committee's participants were either pilots or belonged to the PDK Airport Advisory Board. If the papers were too difficult to be understood, then the Airport surely had no reason to fear releasing them in time for public scrutiny.

A similar example of flagrant Airport stonewalling came after Advisory Committee member Jaime Dutro made a request under the Georgia Open Records Act (GORA) in August 2020 for documents regarding the PDK Master Plan and paid the requested fee but he still has not received the documents more than four months later. Mr. Dutro's most recent follow-up requests have not even been granted the courtesy of a response. No one can make a credible assessment of the proposed Master Plan without actually seeing the core documentation about it. Such consistent stonewalling suggests that the Airport wants to ram through major changes that will guide the development of the second-busiest airport in the state for the next two decades without allowing serious critical evaluation of the proposal's strengths and weaknesses.

2. Failure to Consider Cost Factors: Presentations to the Citizens' Advisory Committee and the public thus been triumphalist in tone, focusing only on the wonderful benefits to DeKalb County that will supposedly accrue by dramatically expanding PDK Airport operations, while almost totally ignoring concurrent cost factors such as diminished quality of life, relative loss of residential property value compared to areas not near a major airport, and potential health problems and costs, especially due to the high lead concentrations near the airport in an area with six public schools nearby, which make it analogous to living near a toxic waste dump for many residents.

A highly regarded comparative national study documents the negative impacts airports have on residential home values (which also impact county tax revenues). The 1998 Cost-Benefit study of the PDK Airport conducted under the auspices of DeKalb County noted that the districts identified as Chamblee-Buford Highway, Doraville, and Northlake/Lakeside have lagged behind the region in terms of residential sales (page 5-15). The Dunwoody area near PDK has underperformed the larger Dunwoody neighborhood (page 5-16). Those who live in the surrounding area have suffered a loss of \$67.6 million (page 5-18), according to the study. There also is a negative impact on quality of life and home values in areas such as Sagamore Hills, a neighborhood three miles from the Airport, where large jets routinely bank at almost treetop level above a large residential neighborhood dating back to the 1950s.

3. Concerns about Building More Hangars outside PDK Airport's original Fenced Perimeter: The FAA has indicated that the only way that an airport like PDK can discourage additional aircraft from using its facilities is to *not build additional hangar space* to accommodate more aircraft. One of the most controversial proposal in the PDK Master Plan is to build eight new hangars in the 15-acre noise buyout area that the County Commissioners originally set aside in 2000 as greenspace buffer to help protect surrounding neighborhoods from Airport noise and pollution.

Yet in 2017, after the entire Airport had been annexed by the City of Chamblee and the zoning of the buyout area was changed to "commercial," the Airport cut down about six acres of trees there, removed tons of dirt for use as a runway safety buffer, and announced plans to build the

new hangars there. Now that so many of the trees are gone, residents in the area would likely accept other “Airport-compatible” businesses being located there but they strongly oppose extending *direct Airport operations* beyond the Airport’s original fenced perimeter, thereby bringing its disruptive operations closer to surrounding neighborhoods.

4. Many Other Unanswered Questions: Among other issues that deserve careful investigation are the following: (a) Why is PDK Airport so eager for the County to relocate its long-standing garbage-transfer station next to the northeast side of the Airport to another location? What does the PDK Airport eventually hope to do with that site if it can acquire it? (b) Why is PDK Airport increasing presenting itself not primarily as a “general aviation” airport but as an “executive destination” airport that will spare rich executives the the dreadful hassle of having to fly into Hartsfield-Jackson? How many of the executives who fly into PDK Airport actually live, work, or have businesses in DeKalb County? What benefits, if any, will *the people of DeKalb County* gain from greatly enlarging the numbers and sizes of aircraft using PDK, as opposed to the wealthy private jet owners and the powerful private fixed-base operators at PDK who sell gas to them? (c) Why is a privately owned web site allowed by DeKalb County to continue to masquerade as the official PDK Airport “Home” page, when it is not? Are anonymous business enterprises at PDK Airport now “the tail wagging the [DeKalb County-owned-airport] dog”?

5. The Necessity of Completing a Credible Environmental Study of PDK Airport BEFORE Approving a New PDK Master Plan: In the initial three pages of my presentation, I discussed the ongoing struggle for more than three decades, ever since the the Airport’s major runway was extended by 1,000 feet during the late 1980s, without first conducting a valid environmental impact study. In order to push that through, the County and FAA made legally binding promises to the 11th Circuit Court (which they have not kept) that the extension would not be used to allow aircraft weighing more than the existing 66,000 lbs. MTOW level to routinely use the airport in the future. Disputes over this issue for the next three decades are a major reason why no new PDK Master Plan has been approved since 1993 and why the proposed 2006 Master Plan was never approved by the BOC, after citizens showed that the fleet mix provided by the Airport for its Master Plan was invalid and that a crucial part of the PDK Airport Layout Plan also was incorrect.

Currently a major County-promised environmental study of relative air and noise pollution at PDK Airport now, as compared to the projected much-expanded airport, is in the process of being set up. We contend that the study must be completed BEFORE any valid Master Plan can be approved by the BOC. The FAA has indicated that there is no time limit on approval of the Master Plan. If the BOC is to do its “due diligence” in this matter, the impact of this proposed plan must first be rigorously explored. Some highly controversial zoning proposals have sometimes taken more than a year or more to be resolved. The PDK Master Plan is far more consequential, and it must not be rammed through just because the Airport wants it approved quickly before its potential deficiencies can be discovered.

Thank you very much for allowing me share these concerns with you today.

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