

PUBLIC HEARING

Environmental Assessment  
Proposed Improvement to Runway 2R-20L  
DeKalb Peachtree Airport

Purpose of the Hearing

The DeKalb County Commission desires to receive comments from the public concerning the social, economic and environmental effects of the proposed construction of an additional 1,000 feet to the north end of Runway 2R-20L and displacement of the landing threshold for Runway 20L at the DeKalb Peachtree Airport.

Why is the Project Needed?

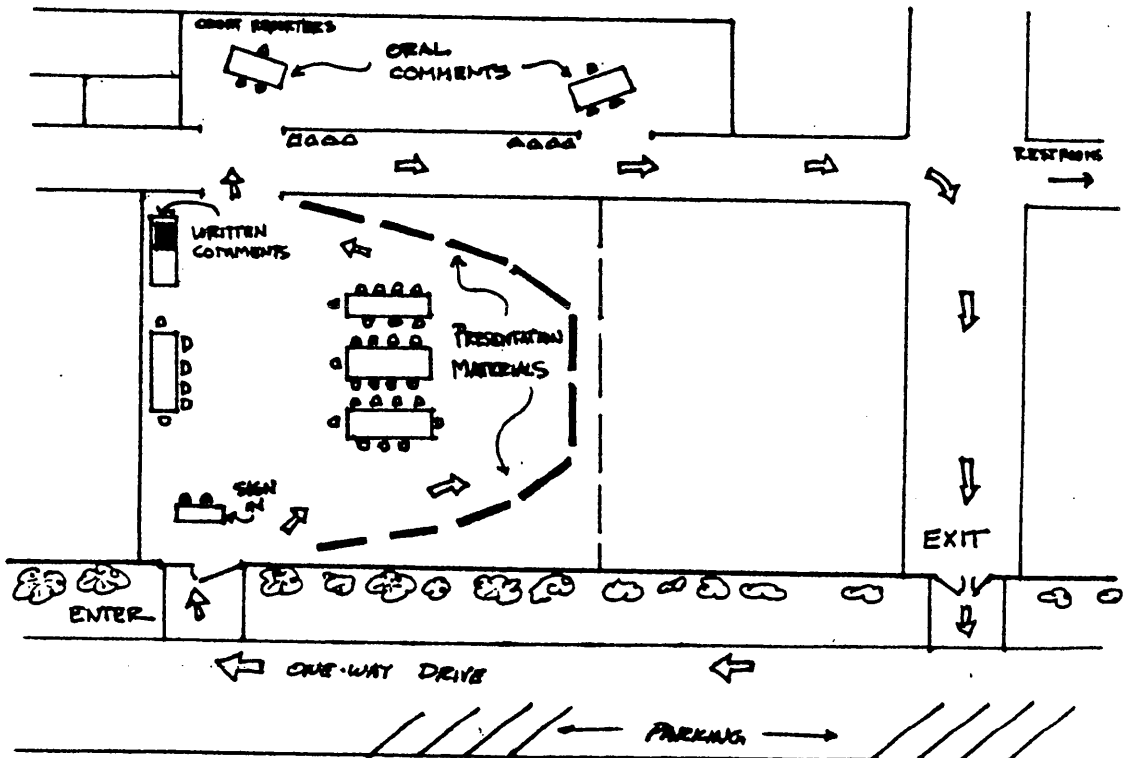
Additional runway length is needed in order to improve operational safety and meet the needs of the existing aircraft that currently use the airport. The proposed project represents one of the highest measures for improving the safety of operations on Runway 20L. The proposed project will not increase the capacity of the airport nor accommodate aircraft larger than those using the airport today.

How can you Participate?

The Public Hearing for the Environmental Assessment has been formatted to allow the maximum number of public comments to be received for the record. Whether you are for, against, or undecided about the proposed project, you can submit a written or oral comment anytime between the hours of 2:00 p.m. and 9:00 p.m. on September 3, 1986 at the DeKalb School System Occupational Education Center on Alton Road (see map).

A graphic display of the assessment's findings will be present at the Hearing. Representatives of Airport Management and the Consultant Study Team will be in attendance to answer individual questions and to direct people through the process. The Hearing room will be organized as shown on the sketch below. Oral comments will be received by a court reporter and a time limit will be established. Oral and written comments will be treated equally. All comments will be bound together and copies provided to the DeKalb County Commission and the Federal Aviation Administration.

PUBLIC HEARING LAYOUT  
3075 ALTON RD.



More Information?

Copies of the draft environmental assessment, prepared in accordance with the Council on Environmental Quality (CEQ) and Federal Aviation Administration regulations and guidelines, are available for public review during normal working hours from August 4 thru September 3, 1986 at the following locations:

Airport Director's Office  
Room 206, Administration Building  
DeKalb Peachtree Airport  
Atlanta, Georgia

Dunwoody Library  
5064 Nandian Lane  
Dunwoody, Georgia

DeKalb County Chamber of Commerce  
750 Commerce Drive  
Suite 201  
Decatur, Georgia

Doraville Library  
3748 Central Avenue  
Doraville, Georgia

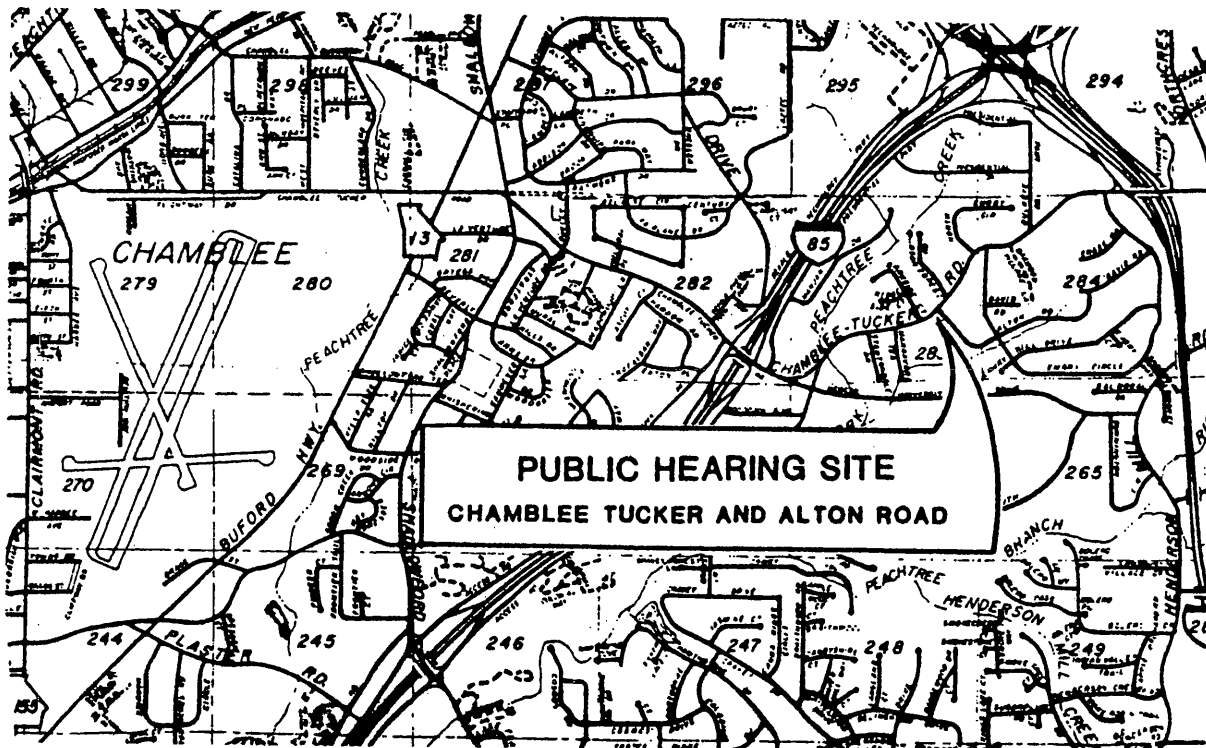
Brookhaven Library  
1242 N. Druid Hills Road, N.E.  
Atlanta, Georgia

Maud M. Burrus Library  
215 Sycamore Street  
Decatur, Georgia

Chamblee Library  
3460 Chamblee-Dunwoody Road  
Chamblee, Georgia

Avis G. Williams  
1282 McConnell Dr.  
Decatur, Georgia

Written comments can also be mailed to the Airport Director's office until Friday, September 5, 1986.



PROPOSED CONSTRUCTION OF A 1,000 FOOT DISPLACED THRESHOLD

FOR RUNWAY 20L AT DEKALB PEACHTREE AIRPORT

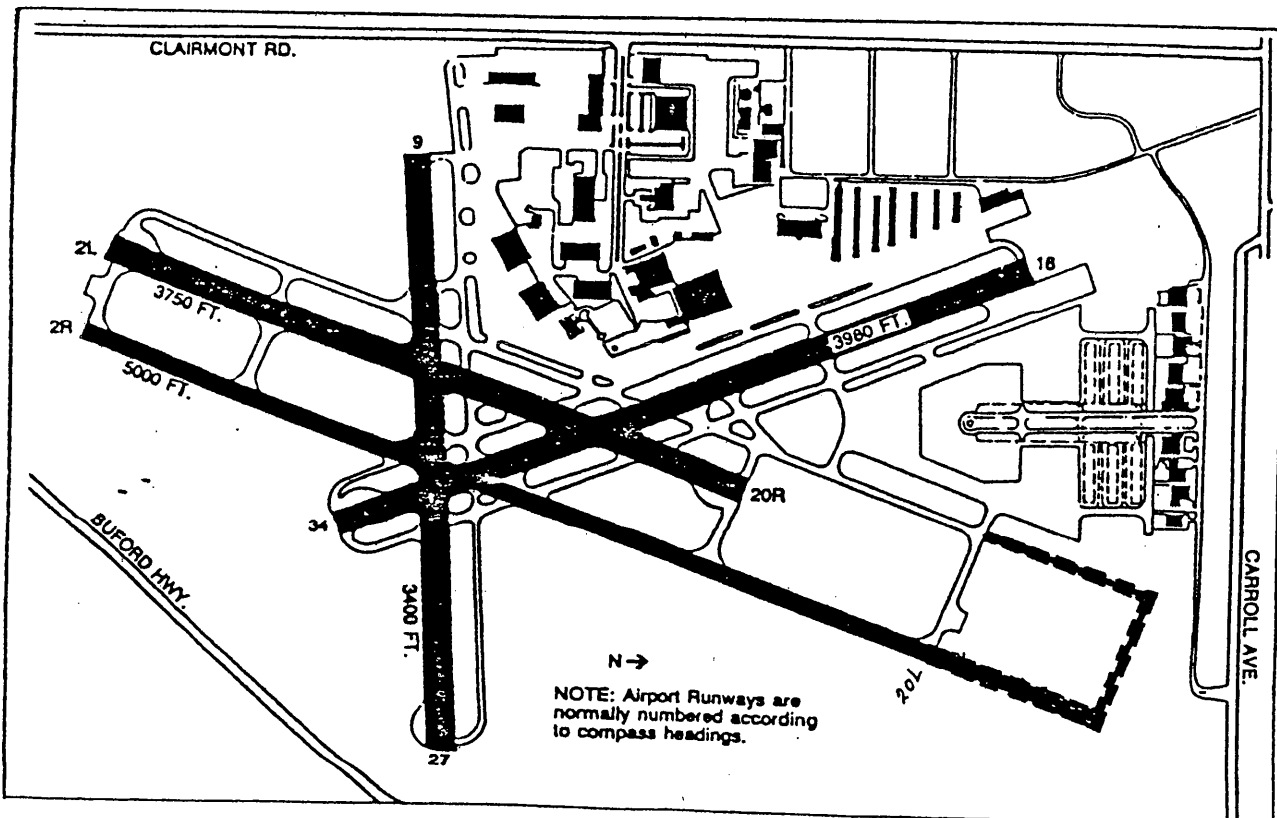
**PURPOSE:** To increase the margin of safety for the aircraft which utilize DeKalb Peachtree Airport. The aircraft include all general aviation airplanes up to 66,000 lbs. The airplanes that will benefit from the proposed displaced threshold of Runway 20L are the high performance corporate jet aircraft which range in size from 12,500 lbs. to 66,000 lbs and require the use of Runway 20L-2R which is 5000' long and has a weight bearing capacity of 66,000 lbs. These aircraft will realize a 1000 foot advantage during takeoff which will increase the margin of safety for these aircraft. This can be very important, particularly during hot and humid days, inclement weather, or other conditions which may reduce the aircraft's performance or cause the takeoff conditions to be other than optimum.

**FUNDING:** The funding for the proposed displaced threshold will be as follows:

		<u>ESTIMATED AMOUNT</u>
FAA	90%	\$1,080,000.00
State	5%	60,000.00
County	5%	60,000.00
<b>TOTAL ESTIMATED COST</b>		<u>\$1,200,000.00</u>

The FAA funding portion is a result of an Airport Improvement Program (AIP) Aviation Trust Fund which comes from an aviation users tax imposed on aviation fuel, parts and airline tickets. The State portion is a result of the DOT airport improvement program. The County portion is paid by revenues generated on the airport.

**LOCATION:** The displaced threshold will be located at the approach end of Runway 20L (See diagram below).









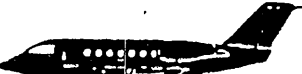







## EFFECTS OF THE 1,000 FOOT DISPLACED THRESHOLD AT PDK

**SAFETY** - The main reason for the displaced threshold is safety. The high performance corporate aircraft that currently use PDK will have an increased margin of safety during departures and arrivals, particularly when high temperatures and humidity reduces the aircraft's performance.

**AIRCRAFT UTILIZATION** - It will not allow larger aircraft to use PDK. Larger aircraft will not be able to operate from DeKalb Peachtree Airport because the weight limitation of the runway will still govern the size of aircraft. The same aircraft that currently use PDK will continue to do so (see attachment for a list of business jet aircraft that may use PDK with or without the displaced threshold).

**NOISE** - It will not increase the noise exposure of aircraft operating at PDK. In fact, many aircraft departing runway 20L will have a reduced noise exposure because they can depart the runway earlier and can reach a higher altitude over the residential area. Arriving aircraft will follow the same glide slope to the runway; therefore, the noise exposure will not be increased.

# Business Jet Fleet at PDK\*

Aircraft	Year Introduced Into Service <sup>1</sup>	Number Of Passengers <sup>1</sup>	Gross Takeoff Weight (lbs) <sup>1</sup>	Maximum Speed (mph) <sup>1</sup>	Takeoff Noise Level (dBA) <sup>2</sup>	Daily Average Operations <sup>3</sup>	
<b>TURBOJETS</b>							
	Gates Learjet 20s	1964	6 - 8	12,500	545	84.7	4.55
	Hawker Sidley 125-1A	1963	6 - 8	17,000	534	83.1	
	Lockheed Jetstar	1960	10	43,700	547	88.7	
	Rockwell Sabreliner 60	1960	6 - 7	20,000	563	85.0	.80
	Westwind Eleven-23	1965	6 - 10	20,700	542	89.7	
	Gulfstream IVIII	1967	10	65,500	581	84.2	.68
							<u>6.03</u>
<b>TURBOFANS</b>							
	Canadair Challenger	1979	10	40,400	581	74.0	
	Cessna Citation VII	1971	6 - 10	11,900	404	67.0	6.00
	Falcon 10	1973	4 - 7	18,700	568	73.2	3.00
	Gates Learjet 35/55	1974	6 - 8	17,000	534	72.0	3.70
	Hawker Sidley 125-3A/RA	1976	6 - 8	20,000	502	75.3	2.70
	Lockheed Jetstar II	1977	10	43,700	547	82.3	.59
	Rockwell Sabreliner 65	1979	6 - 7	24,000	563	74.0	.80
	Westwind Eleven-24	1976	6 - 10	22,900	542	72.2	2.10
							<u>18.89</u>

\* This is a listing of the jet aircraft that operate at PDK. Currently, jet aircraft operations account for approximately six percent of the total operations.

<sup>1</sup> Taylor, J.W.R. and B. Swanborough, 1978. *Civil Aircraft of the World*.

<sup>2</sup> FAA Advisory Circular 36-3C, "Estimated Airplane Noise Levels in A-Weighted Decibels."

<sup>3</sup> DAILY AVERAGE OPERATIONS is based on a two month survey of 1984 aircraft operations. One aircraft operation is an arrival or a departure. Aircraft that does not show an operation means the aircraft did not operate at PDK during the sample period.

PROPOSED CONSTRUCTION OF A 1,000 FOOT DISPLACED THRESHOLD

FOR RUNWAY 20L AT DEKALB PEACHTREE AIRPORT

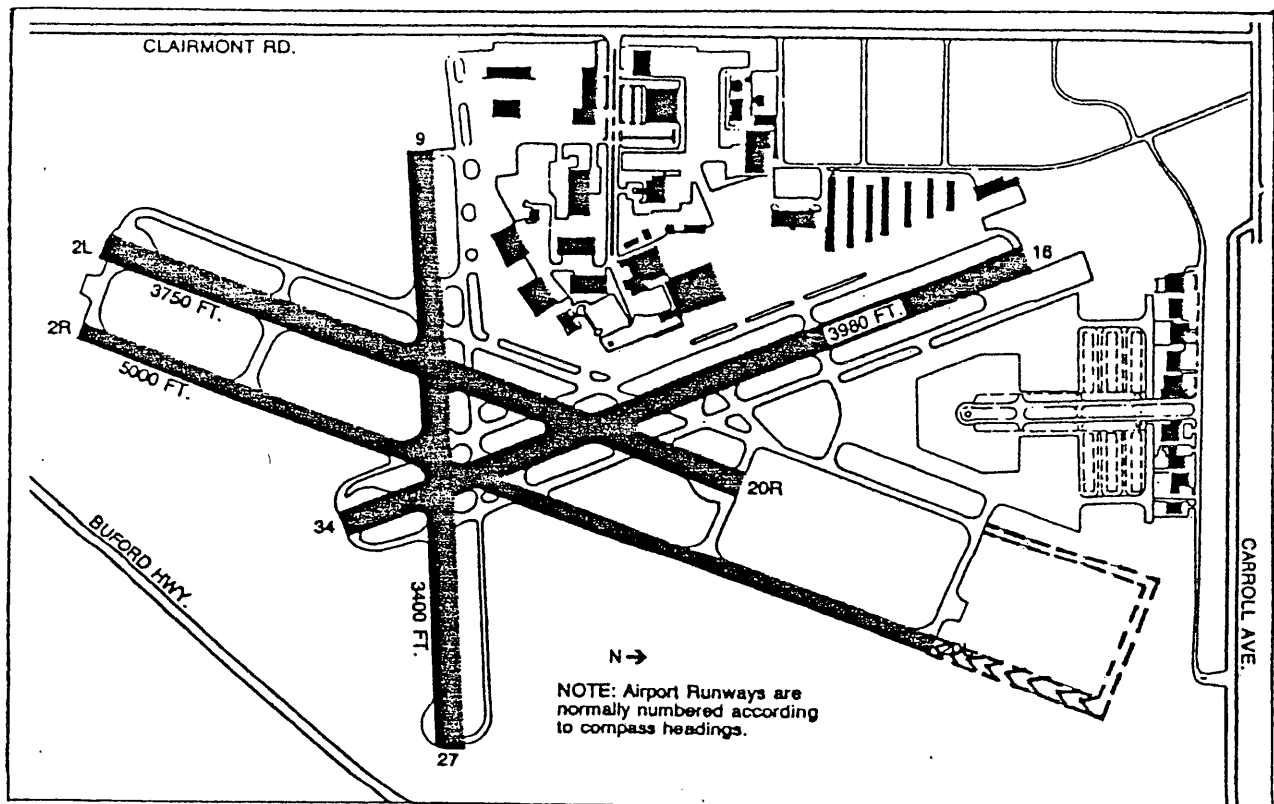
PURPOSE: To increase the margin of safety for the aircraft which utilize DeKalb Peachtree Airport. The aircraft include all general aviation airplanes up to 66,000 lbs. The airplanes that will benefit from the proposed displaced threshold of Runway 20L are the high performance corporate jet aircraft which range in size from 12,500 lbs. to 66,000 lbs and require the use of Runway 20L-2R which is 5000' long and has a weight bearing capacity of 66,000 lbs. These aircraft will realize a 1000 foot advantage during takeoff which will increase the margin of safety for these aircraft. This can be very important, particularly during hot and humid days, inclement weather, or other conditions which may reduce the aircraft's performance or cause the takeoff conditions to be other than optimum.

FUNDING: The funding for the proposed displaced threshold will be as follows:

		<u>ESTIMATED AMOUNT</u>
FAA	90%	\$1,080,000.00
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TOTAL ESTIMATED COST		<u>\$1,200,000.00</u>

The FAA funding portion is a result of an Airport Improvement Program (AIP) Aviation Trust Fund which comes from an aviation users tax imposed on aviation fuel, parts and airline tickets. The State portion is a result of the DOT airport improvement program. The County portion is paid by revenues generated on the airport.

LOCATION: The displaced threshold will be located at the approach end of Runway 20L (See diagram below).



**AIRCRAFT UTILIZATION:** Displacing the threshold of Runway 20L will not allow larger aircraft to use the airport because the weight limitation of the runway will still govern the size of aircraft that can use PDK. The same aircraft that currently use PDK will continue to do so.

**AIRCRAFT OPERATIONS:** The displaced threshold will not cause an increase in operations at PDK.

**NOISE:** It will not increase the noise exposure of aircraft operating at PDK. In fact, many aircraft departing runway 20L will have a reduced noise exposure because they can depart the runway earlier and can be at a higher altitude over the residential area. Also, with the increased margin of safety the jet aircraft operator can utilize maximum noise reduction techniques during departure operations. This includes attaining a higher altitude while over the airport property and reducing to noise abatement climb power once over the residential area. Arriving aircraft will follow the same glide slope to the runway; therefore, the noise exposure will not be increased.

**COMMUNITY INPUT:** There are 24 steps required in the process of implementing a FAA AIP project. Several steps include approval from the Board of Commissioners. Also, the County will hold public information meetings to give individuals an opportunity to learn about the project and its effects on the community and to make comments regarding the project. The Chief Executive Officer has informed the Airport Advisory Committee that no action would be taken on this project without receiving a full report from the Noise Abatement Specialist or noting a recommendation from the Airport Advisory Committee.

#### **ACTION NECESSARY PRIOR TO START OF FAA, AIP PROJECTS**

1. Preliminary listing of improvement projects.
2. Commissioners' approval to request grants from FAA and State.
3. Pre-design Conference with FAA.
4. Completion of Pre-application qualifications.
5. Commissioners' approval of Pre-application.
6. FAA approval of Pre-application.
7. Advertise for selection of consulting engineer.
8. Commissioners' approval of engineering contract.
9. FAA approval of engineering contract.
10. Tentative allocation from FAA (usually announced by Congressman).
11. Tentative allocation conference with FAA.
12. Engineer's completion of plans and specifications.
13. Review and approval of plans and specifications by FAA and County.
14. Submit Purchase Requisition for project.
15. Advertise for bids for construction.
16. Bid opening.
17. Prepare and submit Project Application to FAA.
18. FAA makes grant offer.
19. Commissioners accept and approve grant and allocate funds.
20. FAA executes final grant.
21. Commissioners award construction contract.
22. Pre-construction conference with FAA, State and contractors.
23. Notice to proceed approved.
24. Contractor begins work.

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Why is the Project Needed?

Additional runway length is needed in order to improve operational safety and meet the needs of the existing aircraft that currently use the airport. The proposed project represents one of the highest measures for improving the safety of operations on Runway 20L. The proposed project will not increase the capacity of the airport nor accommodate aircraft larger than those using the airport today.

How can you Participate?

The Public Hearing for the Environmental Assessment will allow the maximum number of public comments to be received against, or undecided about the project, anytime between the hours of 10:00 a.m. and 5:00 p.m. on September 3, 1986 at the DeKalb School System Occupational Center.

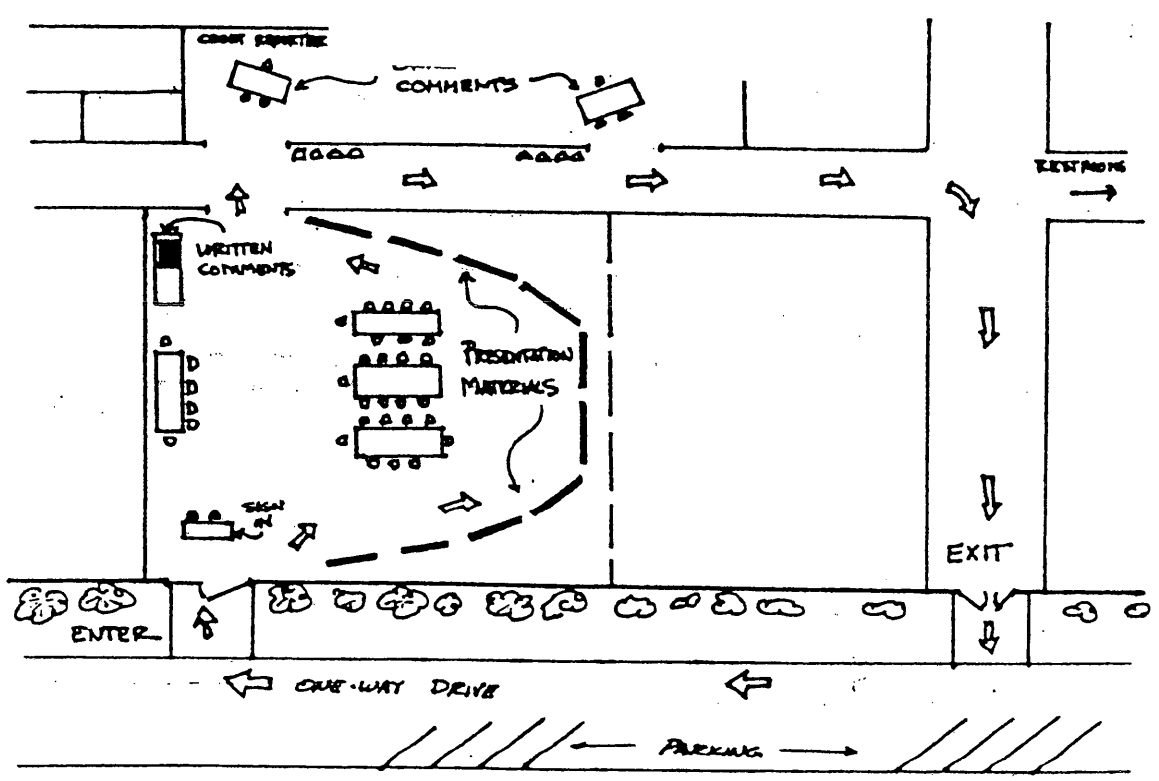
*This sheet mailed to Commissioners on 8/28/86.*

to allow the public to be heard. If you are for, against, or undecided about the project, please bring your written or oral comments to the hearing on September 3, 1986 at the DeKalb School System Occupational Center (see map).

A graphic display of the assessment's findings will be presented by representatives of Airport Management and the DeKalb County Commission. Questions and answers will be organized as shown on the floor plan. A court reporter and a time limit will be observed. All comments will be treated equally. All comments will be received by the DeKalb County Commission and the Federal Aviation Administration.

Representatives of the DeKalb County Commission will be present at the hearing. Representatives of the DeKalb County Commission will be present at the hearing. Representatives of the DeKalb County Commission will be present at the hearing.

**PUBLIC HEARING LAYOUT**  
3075 ALTON RD.







# Memorandum

September 3, 1986

DEKALB PEACHTREE AIRPORT

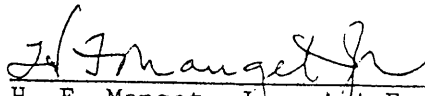
To: BILLIE IZARD, COMMISSION OFFICE ADMINISTRATOR  
From: H. F. MANGET, JR., AIRPORT DIRECTOR  
Subject: INFO AS REQUESTED

The Environmental Study for the displaced threshold runway improvement has not been completed in its final form, and it will not be until after all interested citizens have had a chance to express their feelings either orally or written at the Public Hearing from 2:00 p.m. to 9:00 p.m. on September 3, 1986.

The runway in question will not be strengthened and will continue to serve the same type aircraft that have been using the runway since it was constructed in 1968.

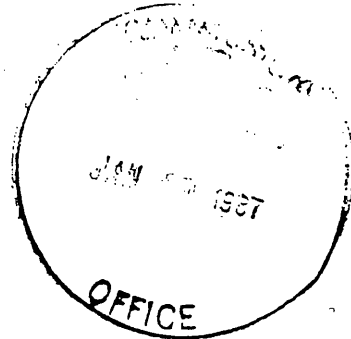
Over fifty percent of the aircraft accidents that have occurred during the past 28 years at the airport could have been prevented if a longer runway had been available to the pilots for take off. Our desire is to make DeKalb Peachtree Airport the safest airport in the state for pilots and those on the ground. We do not wish to allow larger or heavier aircraft to use the airport than those which are now using it.

Citizens input has been invited for this project since it was publicly announced a month ago. All comments from the public will be carefully assessed and they will be addressed in the final report.

  
H. F. Manget, Jr., A.A.E.

HFMJr/nr





2228 Marann Drive  
Atlanta, GA 30345  
January 26, 1987

Manuel Maloof  
Chief Executive Officer  
DeKalb County  
1300 Commerce Drive  
Decatur, GA 30030

Dear Mr. Maloof,

We are writing to ask you to reconsider your position regarding the extension of the DeKalb-Peachtree Airport. As I am sure you are aware by now, the original statements made regarding the need for the runway extension, i.e., for safety, were deliberately incomplete and deceptive. It is now clear that the extension is merely the first step in a plan to expand the number and type of planes served by that airfield, which is in direct contradiction to the statements made earlier both to the public and the FAA. I have included the five year capital improvement plan, which illustrates the real purpose of the airport extension. I would also note the amount of money allotted to noise abatement property acquisition. It is very clear to those of us who live in the area that the property acquisition will mean that some homeowners will probably have their lands confiscated in order to accomplish that goal.

We are well aware that you have not been responsive to your constituents in the past regarding this, as well as other, matters. However, we do ask that you restudy your current position on the airport extension, in light of what that extension really means to the people now living in the county.

Sincerely,

*Ann T. Foltz*  
Ann T. Foltz

*John J. Foltz*  
John J. Foltz

## Five Year Capital Improvement Program DEKALB-PEACHTREE AIRPORT

Fiscal Year	Planned Improvements*	Estimated Total Cost	Distribution of Costs		
			FAA*	State	Sponsor
1986	<ul style="list-style-type: none"> <li>• Relocate Noncross VOR to PDK**</li> <li>• Grade 500' overrun, R/W 34 (10); Seed overrun R/W 20L</li> <li>• Perimeter Service Road - CFR</li> <li>• Seal &amp; Overlay R/W 9-27 (3)</li> <li>• 1000' Runway Extension R/W 20L (4)</li> <li>• Resurface T-hangar Aprons (9)</li> <li>• FBO Access Road (6)</li> <li>• Noise Abatement Property Acquisition</li> </ul>	— \$ 1,515,000 150,000 120,000 1,200,000 21,000 120,000 850,000	— \$ 1,363,500 135,000 0 1,080,000 0 108,000 765,000	— \$ 75,750 7,500 90,000 60,000 0 6,000 0	— \$ 75,750 7,500 30,000 60,000 21,000 6,000 85,000
	<b>SUBTOTAL</b>	<b>\$ 3,978,000</b>	<b>\$ 3,451,500</b>	<b>\$ 239,250</b>	<b>\$ 285,250</b>
1987	<ul style="list-style-type: none"> <li>• Construct 20 unit T-hangars (2)</li> <li>• New Air Traffic Control Tower (5)**</li> <li>• Fire Protection at Runway Approaches (11)</li> <li>• Demolition &amp; Removal of Old Buildings (12)</li> <li>• CFR Building (7)</li> <li>• Noise Abatement Property Acquisition</li> </ul>	300,000 — 100,000 80,000 850,000 850,000	0 — 0 0 0 765,000	0 0 0 0 42,500 0	300,000 — 100,000 80,000 807,500 85,000
	<b>SUBTOTAL</b>	<b>\$ 2,180,000</b>	<b>\$ 765,000</b>	<b>\$ 42,500</b>	<b>\$ 1,372,500</b>
1988	<ul style="list-style-type: none"> <li>• Relocate Rotating Beacon (17)</li> <li>• Construct 20 unit T-hangars (2)</li> <li>• Additional Auto Parking Area (18)</li> <li>• Seal &amp; Overlay R/W 16-34 (19)</li> <li>• Noise Abatement Property Acquisition</li> </ul>	20,000 320,000 80,000 280,000 1,010,000	18,000 0 0 0 909,000	1,000 0 0 210,000 0	1,000 320,000 80,000 70,000 101,000
	<b>SUBTOTAL</b>	<b>\$ 1,710,000</b>	<b>\$ 927,000</b>	<b>\$ 211,000</b>	<b>\$ 572,000</b>
1989	<ul style="list-style-type: none"> <li>• New Terminal Building (20)</li> <li>• New Airport Maintenance Building (21)</li> <li>• Noise Abatement Property Acquisition</li> </ul>	1,400,000 200,000 850,000	0 0 765,000	0 0 0	1,400,000 200,000 85,000
	<b>SUBTOTAL</b>	<b>\$ 2,450,000</b>	<b>\$ 765,000</b>	<b>\$ 0</b>	<b>\$ 1,685,000</b>
1990	<ul style="list-style-type: none"> <li>• Extend R/W 20R to 5000' (22)</li> <li>• Widen R/W 20L. Relocate Edge Lights (23)</li> <li>• Seal &amp; Overlay R/W 2L-20R (24)</li> <li>• Noise Abatement Property Acquisition</li> <li>• Non-Directional Beacon at Outer Marker</li> <li>• Exit Taxiways on R/W 2R-20L (14)</li> <li>• Exit Taxiway on R/W 16-34</li> </ul>	2,600,000 3,000,000 260,000 3,250,000 65,000 137,000 69,000	2,340,000 2,700,000 0 2,925,000 65,000 123,300 62,100	130,000 150,000 195,000 0 0 6,850 3,450	130,000 150,000 65,000 325,000 0 6,850 3,450
	<b>SUBTOTAL</b>	<b>\$ 9,381,000</b>	<b>\$ 8,215,400</b>	<b>\$ 485,300</b>	<b>\$ 680,300</b>
<b>TOTAL FIVE-YEAR PROGRAM</b>		<b>\$19,697,000</b>	<b>\$14,123,900</b>	<b>\$ 978,050</b>	<b>\$ 4,595,050</b>

\*Map Reference numbers are shown in parentheses "( )" after appropriate development items.  
 \*Airport Improvement Program (AIP) funds only.  
 \*\*Since AIP funds are not involved in this item and there would be no anticipated costs to the State of Sponsor, the costs are not shown on this table.

"The County is going along with the  
 master plan of the Airport."  
 --CEO Manuel Maloof  
 The Atlanta Journal 12/29/86

FEDERAL ASSISTANCE

1. TYPE OF ACTION  
 PREAPPLICATION  
 APPLICATION  
 NOTIFICATION OF INTENT (Opt.)  
 REPORT OF FEDERAL ACTION  
(Mark appropriate box)

2. APPLICANT'S APPLICATION

a. NUMBER One  
 b. DATE Year month day  
 19 87 09 10

3. APPLICATION IDENTIFIER

a. NUMBER 79-01-24-04  
 b. DATE Year month day  
 ASSIGNED 1979 3 1

Leave Blank

4. LEGAL APPLICANT/RECIPIENT

a. Applicant Name : DeKalb County, Georgia  
 b. Organization Unit : DeKalb County Board of Commissioners  
 c. Street/P.O. Box : 600 Adm. Bldg., 1300 Commerce Drive  
 d. City : Decatur a. County : DeKalb  
 f. State : Georgia g. ZIP Code: 30030  
 h. Contact Person (Name & Telephone No.) : H.F. Manget, Jr., Airport Director (404) 457-7236

5. FEDERAL EMPLOYER IDENTIFICATION NO.  
 58-6000814

6. PRO. GRAM (From Federal Catalog)

a. NUMBER 120111016  
 b. TITLE Airport Improvement Program (AIP)

7. TITLE AND DESCRIPTION OF APPLICANT'S PROJECT

- Construct 1000' displaced threshold (runway 20L) with MALS in pavement.
- Construct connecting taxiway with MITL.
- Mark & install HIRL on displaced threshold.

8. TYPE OF APPLICANT/RECIPIENT

- A-State
  - B-Interstate
  - C-Substate District
  - D-County
  - E-City
  - F-School District
  - G-Special Purpose District
  - H-Community Action Agency
  - I-Higher Educational Institution
  - J-Indian Tribe
  - K-Other (Specify):
- Enter appropriate letter  D

9. TYPE OF ASSISTANCE

- A-Basic Grant
  - B-Supplemental Grant
  - C-Loan
  - D-Investment
  - E-Other
- Enter appropriate letter(s)  A  -

10. AREA OF PROJECT IMPACT (Name of cities, counties, States, etc.)

Chamblee, DeKalb County, Georgia

11. ESTIMATED NUMBER OF PERSONS BENEFITING  
 461,600

12. TYPE OF APPLICATION

- A-New
  - B-Renewal
  - C-Revision
  - D-Continuation
  - E-Augmentation
- Enter appropriate letter  A

13. PROPOSED FUNDING

a. FEDERAL	\$ 1,695,762 .00
b. APPLICANT	94,209 .00
c. STATE	94,209 .00
d. LOCAL	.00
e. OTHER	.00
f. TOTAL	\$ 1,884,180 .00

14. CONGRESSIONAL DISTRICTS OF:

a. APPLICANT	4	b. PROJECT	4
16. PROJECT START DATE Year month day	19 ASAP	17. PROJECT DURATION	5 Months
18. ESTIMATED DATE TO BE SUBMITTED TO FEDERAL AGENCY	Year month day		19 87 09 10

15. TYPE OF CHANGE (For 15a or 15b)

- A-Increase Dollars
  - B-Decrease Dollars
  - C-Increase Duration
  - D-Decrease Duration
  - E-Cancellation
  - F-Other (Specify):
- Enter appropriate letter(s)

20. FEDERAL AGENCY TO RECEIVE REQUEST (Name, City, State, ZIP code)

F.A.A., Atlanta Airports District Office, Hapeville, GA 30354

21. REMARKS ADDED  
 Yes  No

22. THE APPLICANT CERTIFIES THAT

a. To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached enclosures if the assistance is approved.

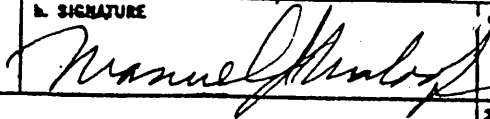
b. If required by OMB Circular A-95 this application was submitted, pursuant to instructions therein, to appropriate clearinghouses and all responses are attached:  No response  Response attached

- (1) Georgia State Clearinghouse
- (2) Atlanta Regional Commission
- (3) (on file Atlanta ADO) - ADAP-06

23. CERTIFYING REPRESENTATIVE

a. TYPED NAME AND TITLE  
 Manuel J. Maloof  
 Chief Executive Officer

b. SIGNATURE



c. DATE SIGNED  
 Year month day  
 1987 Sept 12<sup>th</sup>

24. AGENCY NAME

26. ORGANIZATIONAL UNIT

27. ADMINISTRATIVE OFFICE

25. APPLICATION RECEIVED Year month day  
 RECEIVED 19

28. FEDERAL APPLICATION IDENTIFICATION

29. FEDERAL GRANT IDENTIFICATION

31. ACTION TAKEN

- a. AWARDED
- b. REJECTED
- c. RETURNED FOR AMENDMENT
- d. DEFERRED
- e. WITHDRAWN

32. FUNDING

a. FEDERAL	\$ .00
b. APPLICANT	.00
c. STATE	.00
d. LOCAL	.00
e. OTHER	.00
f. TOTAL	\$ .00

33. ACTION DATE

19

35. CONTACT FOR ADDITIONAL INFORMATION (Name and telephone number)

34. STARTING DATE Year month day  
 19

36. ENDING DATE Year month day  
 19

37. REMARKS ADDED  
 Yes  No

38. FEDERAL AGENCY A-95 ACTION

a. In taking above action, any comments received from clearinghouses were considered. If agency response is due under provisions of Part 1, OMB Circular A-95, it has been or is being made.

b. FEDERAL AGENCY A-95 OFFICIAL (Name and telephone no.)

SECTION I - APPLICANT/RECIPIENT DATA

SECTION II - CERTIFICATION

SECTION III - FEDERAL AGENCY ACTION



Agreement 5

# Grant Agreement Part 1 - Offer

Approved: OMB No. 2120-0065

Date of Offer SEP 10 1987

DeKalb - Peachtree  
Atlanta, Georgia

Airport/Planning Area

Project Number: 3-13-0010-03

Contract Number: DTFA 06-87-A-80184

To: DeKalb County  
(herein called the "Sponsor")

From: The United States of America (acting through the Federal Aviation Administration, herein called the "FAA")

Whereas, the sponsor has submitted to the FAA a Project Application dated 9-10-87, for a grant of Federal funds for a project at or associated with the DeKalb - Peachtree Airport/Planning Area which Project Application, as approved by the FAA, is hereby incorporated herein and made a part hereof; and

Whereas, the FAA has approved a project for the Airport or Planning Area (herein called the "Project") consisting of the following:

Extend and mark (as a displaced threshold) Runway 2R/20L (1,000'x100'), extend and mark parallel taxiway to Runway 2R/20L (1,000'x50'); extend HIRL and MITL; relocate MALSF.

as more particularly described in the Project Application.

Therefore, pursuant to and for the purpose of carrying out the provisions of the Airport and Airway Improvement Act of 1982, herein called the "Act," and/or the Aviation Safety and Noise Abatement Act of 1979, and in consideration of (a) the sponsor's adoption and ratification of the representations and assurances contained in said Project Application and its acceptance of this Offer as hereinafter provided, and (b) the benefits to accrue to the United States and the public from the accomplishment of the Project and compliance with the assurances and conditions as herein provided, **The Federal Aviation Administration, for and on behalf of the United States, hereby offers and agrees to pay, as the United States share of the allowable costs incurred in accomplishing the Project, Ninety percent (90%)**

This Offer is made on and subject to the following terms and conditions:

#### Conditions

- The maximum obligation of the United States payable under this offer shall be \$ 1,679,426. For the purposes of any future grant amendments which may increase the foregoing maximum obligation of the United States under the provisions of Section 512(b) of the Act, the following amounts are being specified for this purpose:
  - \$ for planning
  - \$ for land acquisition
  - \$ 1,679,426 for airport development or noise program implementation (other than land acquisition).
- The allowable costs of the project shall not include any costs determined by the FAA to be ineligible for consideration as to allowability under the Act.
- Payment of the United States share of the allowable project costs will be made pursuant to and in accordance with the provisions of such regulations and procedures as the Secretary shall prescribe. Unless otherwise stated in this grant agreement, any program income earned by the sponsor during the grant period shall be deducted from the total allowable project costs prior to making the final determination of the United States share. Final determination of the United States share will be based upon the final audit of the total amount of allowable project costs and settlement will be made for any upward or downward adjustments to the Federal share of costs.
- The sponsor shall carry out and complete the Project without undue delay and in accordance with the terms hereof, and such regulations and procedures as the Secretary shall prescribe, and agrees to comply with the assurances which were made part of the project application.
- The FAA reserves the right to amend or withdraw this offer at any time prior to its acceptance by the sponsor.
- This offer shall expire and the United States shall not be obligated to pay any part of the costs of the project unless this offer has been accepted by the sponsor on or before September 30, 1987 or such subsequent date as may be prescribed in writing by the FAA.
- The sponsor shall take all steps, including litigation if necessary, to recover Federal funds spent fraudulently, wastefully, or in violation of Federal antitrust statutes, or misused in any other manner in any project upon which Federal funds have been expended. For the purposes of this grant agreement, the term "Federal funds" means funds however used or disbursed by the sponsor that were originally paid pursuant to this or any other Federal grant agreement. It shall obtain the approval of the Secretary as to any determination of the amount of the Federal share of such funds. It shall return the recovered Federal share, including funds recovered by settlement, order or judgment, to the Secretary. It shall furnish to the Secretary, upon request, all documents and records pertaining to the determination of the amount of the Federal share or to any settlement, litigation, negotiation, or other efforts taken to recover such funds. All settlements or other final dispositions of the sponsor, in court or otherwise, involving the recovery of such Federal share shall be approved in advance by the Secretary.
- The United States shall not be responsible or liable for damage to property or injury to persons which may arise from, or be incident to, compliance with this grant agreement.
- It is understood and agreed that if, during the life of the project, the FAA determines that the grant amount exceeds the expected needs of the Sponsor by \$5,000 or 5% of the grant amount, whichever is greater, the grant amount can be reduced by letter from the FAA to the Sponsor advising of the budget change. Upon issuance of the letter, the maximum obligation of the United States under the grant is reduced to the specified amount.

The Sponsor's acceptance of this Offer and ratification and adoption of the Project Application incorporated herein shall be evidenced by execution of this instrument by the Sponsor, as hereinafter provided, and this Offer and Acceptance shall comprise a Grant Agreement, as provided by the Act, constituting the contractual obligations and rights of the United States and the Sponsor with respect to the accomplishment of the Project and compliance with the assurances and conditions as provided herein. Such Grant Agreement shall become effective upon the Sponsor's acceptance of this Offer.

United States of America  
Federal Aviation Administration

Samuel F. Austin  
Name

Manager, Atlanta Airports District Office  
Title

### Part II - Acceptance

The Sponsor does hereby ratify and adopt all assurances, statements, representations, warranties, covenants, and agreements contained in the Project Application and incorporated materials referred to in the foregoing Offer and does hereby accept this Offer and by such acceptance agrees to comply with all of the terms and conditions in this Offer and in the Project Application.

Executed this

15th day of SEPTEMBER, 1987

Dekalb County  
Name of Sponsor

By Manuel Morales  
Sponsor's Designated Official Representative

Title CHIEF EXECUTIVE OFFICER

(SEAL)

Attest: David J. Ryan  
Title: CLERK

### Certificate of Sponsor's Attorney

I, Sidney A. Johnson, acting as Attorney for the Sponsor do hereby certify:

That in my opinion the Sponsor is empowered to enter into the foregoing Grant Agreement under the laws of the State of Georgia. Further, I have examined the foregoing Grant Agreement and the actions taken by said Sponsor relating thereto, and find that the acceptance thereof by said Sponsor and Sponsor's official representative has been duly authorized and that the execution thereof is in all respects due and proper and in accordance with the laws of the said State and the Act. In addition, for grants involving projects to be carried out on property not owned by the Sponsor, there are no legal impediments that will prevent full performance by the Sponsor. Further, it is my opinion that the said Grant Agreement constitutes a legal and binding obligation of the Sponsor in accordance with the terms thereof.

Dated at Decatur, Georgia this 15th day of September, 19 87

Sidney A. Johnson  
Signature of Sponsor's Attorney



PART II

PROJECT APPROVAL INFORMATION SECTION A

Item 1.

Does this assistance request require State, local, regional, or other priority rating?

Yes  No

Name of Governing Body \_\_\_\_\_  
Priority Rating \_\_\_\_\_

Item 2.

Does this assistance request require State, or local advisory, educational or health clearances?

Yes  No  (Attach Documentation)

Name of Agency or Board \_\_\_\_\_

Item 3.

Does this assistance request require clearinghouse review in accordance with OMB Circular A-95?

Yes  No

(Attach Comments)

Item 4.

Does this assistance request require State, local, regional or other planning approval?

Yes  No

Name of Approving Agency \_\_\_\_\_  
Date \_\_\_\_\_

Item 5.

Is the proposed project covered by an approved comprehensive plan?

Yes  No

Check one: State   
Local   
Regional

Location of plan \_\_\_\_\_ Atlanta A.D.O.

Item 6.

Will the assistance requested serve a Federal installation?

Yes  No

Name of Federal Installation \_\_\_\_\_

Federal Population benefiting from Project \_\_\_\_\_

Item 7.

Will the assistance requested be on Federal land or installation?

Yes  No

Name of Federal Installation \_\_\_\_\_

Location of Federal Land \_\_\_\_\_

Percent of Project \_\_\_\_\_

Item 8.

Will the assistance requested have an impact or effect on the environment?

Yes  No

See instruction for additional information to be provided. FAA issued finding of no significant impact for this project

Item 9.

Will the assistance requested cause the displacement of individuals families, businesses, or farms?

Yes  No

Number of:  
Individuals \_\_\_\_\_  
Families \_\_\_\_\_  
Businesses \_\_\_\_\_  
Farms \_\_\_\_\_

Item 10.

Is there other related Federal assistance on this project previous, pending, or anticipated?

Yes  No

See instructions for additional information to be provided.

# HOWARD NEEDLES TAMMEN & BERGENDOFF

June 11, 1986

Mr. H. F. Manget, Jr.  
Airport Director  
Room 206, Admin. Bldg.  
DeKalb Peachtree Airport  
Atlanta, Georgia 30341

Re: Environmental Assessment  
Proposed Runway 20L Improvements  
DeKalb Peachtree Airport

Dear Mr. ~~Manget~~: *Doc*

On May 8, 1986 a meeting was held in the conference room at the PDK Airport directors office to kick off the project and develop a mutually agreed upon program (as outlined in Phase I of the Scope of Work). The following were in attendance:

<u>Name</u>	<u>Representing</u>
Doc Manget	Airport Director - PDK
Mark Oropeza	Ass't Airport Director - PDK
Greg Wellman	HNTB
Andy Harris	HMMH
Bob Miller	HMMH
Andy Bell	HNTB

The approach to the preparation of the EA for the proposed displaced threshold on Runway 20L was discussed in detail at the meeting. The following is a summary of key issues raised and decisions made:

- Three main areas should be discussed in the EA that describe the project need: 1) Safety, 2) Economics and 3) Noise Abatement.
- The extension to 20L by 1,000' would provide for a longer period for safer operations during a typical summer day since the larger business jets currently using PDK could depart at higher pay loads during the warmer hours of the day instead of early morning or evening.
- The majority of aircraft currently using PDK would have an additional margin of safety with the longer runway length when considering engine out performance and similar emergencies.

#### Architects Engineers Planners

2970 Peachtree Road, N.W., Suite 200, Atlanta, Georgia 30305, 404 237-1531

**Partners** James F. Finn PE, Paul L. Heineman PE, Gerard F. Fox PE, Browning Crow PE, Charles T. Hennigan PE, Daniel J. Watkins PE, Daniel J. Spigai PE, John L. Cotton PE, Francis X. Hall PE, Robert S. Coma PE, Donald A. Dupies PE, William Love AIA, Robert D. Miller PE, James L. Tuttle, Jr. PE, Hugh E. Schall PE, Cary C. Goodman AIA, Gordon H. Slaney, Jr. PE, Harvey K. Hammond, Jr. PE  
**Associates** Daniel J. Appel PE, Robert W. Richards PE, Don R. Ort PE, Frederick H. Sterbenz PE, Robert B. Kollmar PE, Kendall T. Lincoln CPA, Jack P. Shedd PE, Roberts W. Smilhem PE, Richard D. Beckman PE, Harry D. Bertossa PE, Ralph E. Robison PE, Cecil P. Counts PE, Stephen G. Goddard PE, Stanley I. Mast PE, Robert W. Anzia PE, Walter Sharko PE, James O. Russell PE, Ross L. Jensen AIA, Frank T. Lamm PE, Alexander F. Silady PE, John W. Wight PE, Thomas K. Dyer PE, Ronald W. Aarons AIA, H. Jerome Butler PE, Blaise M. Carriere PE, Michael P. Ingardia PE, Bernard L. Prince PE, Stephen B. Quinn PE, Saul A. Jacobs PE, James A. Smith, Ronald F. Turner AIA, C. Frank Harscher, III, Ewing H. Miller FAIA, Douglas C. Myhre PE, Carl J. Mellea PE  
**Offices** Alexandria, VA, Atlanta, GA, Austin, TX, Baton Rouge, LA, Boston, MA, Casper, WY, Charleston, WV, Chicago, IL, Cleveland, OH, Dallas, TX, Denver, CO, Fairfield, NJ, Houston, TX, Indianapolis, IN, Kansas City, MO, Lexington, KY, Lexington, MA, Los Angeles, CA, Miami, FL, Milwaukee, WI, Minneapolis, MN, Newark, DE, New York, NY, Orlando, FL, Overland Park, KS, Philadelphia, PA, Phoenix, AZ, Raleigh, NC, Seattle, WA, Tampa, FL, Tulsa, OK

Mr. H. F. Manget

June 11, 1986

Page 2

- The present length of Runway 20L (5,001') is restricting the operation of large corporate aircraft currently using PDK. This results in the loss of potential revenue to the County and the FBOs due to reduced fuel flowage. The operator is likely to stop for extra fuel at another airport enroute. ( It was agreed that this scenario would be investigated further and several corporate aircraft owners who frequently traveled to California, Canada, etc., would be contacted - ie., Rollins Co.).
- The additional runway length on 20L and the displacement of the landing threshold may provide a possible noise benefit to the community. The majority of the aircraft departing on the runway would be higher over the community to the south since their start of take-off would be 1,000' further away.
- Because of the close proximity of Runway 20L to Carroll Avenue, the impact of the take-off noise at the start of roll on the homes in close proximity to Carroll Avenue would need to be addressed in the EA. It was mentioned that Carroll Avenue was programmed for widening to a 4-lane road.
- The county already has purchased aviation easements (noise and height) for a number of the homes in the close-in approach area for 20L. A portion of this same area has been purchased by the county.
- People who have opposed the proposed project believe that the additional runway length will increase the volume of traffic, attract large jet aircraft (up to B-727, DC-9 type aircraft), increase noise impacts, and increase the potential of an accident.
- Most of the GA large aircraft that would use the lengthened runway are already at PDK.
- The public hearing should be set up to provide maximum opportunity for input from all interested parties. It should be in a format in which group intimidation would not prevent individuals from providing formal comment to the EA document. A town hall meeting format should be avoided. HNTB agreed to provide the Airport with an overview of the proposed public hearing format and procedures. The County would be responsible for legal advertisement, court recorder fees, and meeting set up.
- It was decided that a briefing meeting with the county commission should be held during the preparation of the EA draft. This would be prior to the advertisement of the public hearing.
- Two joint meetings of the Airport Authority and Airport Advisory

Mr. H. F. Manget  
June 11, 1986  
Page 3

Committee would be held during the EA process. It was felt that these meetings would be held in lieu of a public information meeting as the community and airport groups are well represented on these committees and the schedule constraints would make it difficult to conduct a public information meeting in addition to the public hearing.

- There were several key dates that were identified in order that the assessment be completed on schedule. The key dates are as follows:

<u>Subject</u>	<u>Date</u>
Project Start	May 8, 1986
Initial Meeting with the Airport Authority/Advisory Committee	May 22, 1986
County Commission Briefing	July 1, 1986
Advertise for Public Hearing	July 24, 1986
Airport Authority/Advisory Committee Joint Meeting	July 30, 1986
Public Hearing	August 23, 1986
Complete EA Document	September 5, 1986

#### Meeting with FAA-ADO

On May 8, 1986 a meeting was also held with the FAA Airports District Offices to discuss the EA approach and other related issues. The following were in attendance:

<u>Name</u>	<u>Representing</u>
Bob Harris	FAA-ADO
Charles Prouty	FAA-ADO
Andy Harris	HMMH
Andy Bell	HNTB
Greg Wellman	HNTB
Bob Miller	HMMH

The following is a brief summary of the main points and key issues that were raised:

- FAA is not required to preform a detailed review of the work scope for the EA project since the County is not requesting a separate planning grant for the EA. FAA is primarily interested in the final product.
- Reimbursement for the EA consultant costs can be covered in a future grant for a construction project that is part of the proposed Runway 20L project.

Mr. H. F. Manget  
June 11, 1986  
Page 4

- FAA emphasized the pavement strength limitations on Runway 2R-20L which would prevent large aircraft such as B727's and DC'9s from using the runway.
- The long range plan (Airport Layout Plan) for PDK does not call for any further strengthening of Runway 2R-20L. This should be pointed out if anyone suggests that the proposed project is the first step in an overall plan to provide an air carrier type runway at PDK.
- Existing pavement strength of Runway 2R-20L could be considered a mitigating measure in the EA. This would then become a continuing obligation of the Airport and FAA to uphold.
- The County could also add to their operating rules and regulations at PDK limiting the types of aircraft that can be handled on certain pavements.
- The EA should be conducted in accordance with CEQ and FAA guidelines and regulations. An opportunity for a format Public Hearing should be an integral part of the EA process.

As a result of the above meetings and subsequent discussions with airport officials, a clear understanding of the requirements of the project was reached by all parties. This letter will also serve to clarify the contract's scope of work relative to specific types and numbers of meetings as well as the desired products and project approach.

Sincerely,

HOWARD NEEDLES TAMMEN & BERGENDOFF



Andrew L. Bell  
Project Manager

ALB:gdd

cc: Charles Prouty  
Bob Miller/Andy Harris

Environmental Assessment  
Runway 20L-2R Improvements  
DeKalb Peachtree Airport

PRELIMINARY LIST OF ALTERNATIVES

- Alternative One - The proposed project. Construct 1,000' extension to the north end of Runway 20L and displace the landing threshold 1,000'.
- Alternative Two - Extend another runway at the DeKalb Peachtree Airport to achieve the desired runway take off length. This includes extending the south end of Runway 20L-2R.
- Alternative Three - Develop a new airport with sufficient runway length.
- Alternative Four - Use a longer runway at another airport in the Atlanta Region.
- Alternative Five - Do nothing.

SCREENING CRITERIA

- o Alternative must achieve a measurable safety improvement for the aircraft operating on the runway;
- o Alternative must be implementable within the time frame of the stated need. (0 to 5 years); and
- o Alternative provide additional operating capabilities for the existing aircraft using the airport.

DEKALB-PEACHTREE AIRPORT  
PROPOSED 1,000-FOOT RUNWAY EXTENSION

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R E C O R D   O F   D E C I S I O N

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August 18, 1987

Federal Aviation Administration  
Southern Region  
Atlanta, Georgia

TABS

1. Record of Decision
2. Environmental Assessment Report
3. Environmental FONSI
4. Airports Finding
5. Flight Standards
6. Airway Facilities
7. Air Traffic



DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
RECORD OF DECISION

PROPOSED RUNWAY EXTENSION AND THRESHOLD DISPLACEMENT

DEKALB-PEACHTREE AIRPORT  
ATLANTA, GEORGIA

The proposed action involves the construction of a 1,000-foot extension northeasterly of Runway 2R-20L and its associated parallel taxiway at the DeKalb-Peachtree Airport (PDK). The landing threshold for Runway 20L will be retained at its presently existing location as a "displaced threshold", and the approach lights will be flush-mounted in the new pavement. The current pavement strength of 66,000 pounds dual wheel loading will be maintained.

The DeKalb County Commission has requested federal assistance and submitted an environmental assessment to accomplish the work described above. The Federal Aviation Administration (FAA) supports the objectives of this project as being justified and needed based on demonstrated safety considerations and aeronautical demand at PDK.

The DeKalb-Peachtree Airport is the second busiest (after Hartsfield Atlanta International) of all airports in Georgia. There were 226,733 aeronautical operations at PDK in 1985, including more than 11,500 by corporate jet aircraft. Statistics indicate that more than 600 annual itinerant operations were by aircraft which would benefit from additional runway length beyond the current 5,000 feet. Specifically, these "critical" aircraft were the Jetstar II, Gulfstream II, and Gulfstream III. Operations by this type of aircraft have provided the basis for justification and approval by the FAA of federal funding for the proposed 1,000-foot runway extension.

The purpose of the project is to provide PDK a runway that provides an enhanced margin of safety for both routine and emergency situations. Existing runways on the airport do not satisfy in every respect design standards for optimum safety of corporate jet operations. The project is needed to satisfy runway design requirements for the "critical" aircraft. To maintain operational safety at the current runway length, certain constraints are imposed on operations by "critical" aircraft at PDK. These include operating with light payloads or fuel loads. Some operations must be conducted during hours of early morning or late night when the temperature is lower and less runway length is needed. This is not only more inconvenient for jet users, but aircraft noise at those hours tends to be more disturbing to airport neighbors.

Several accidents have occurred since 1981 at PDK while aircraft were departing or landing on Runway 2R-20L. These accidents have involved both jet and propeller driven aircraft. Safety and efficiency of operations by both types of aircraft will be enhanced by the runway extension project.

The project will provide pilots the advantage of additional runway length for takeoff in either direction and for landings from the southwest to Runway 2R. With the "displaced threshold", aircraft approaching from the northeast to Runway 20L will not benefit from the additional length.

The airport proprietor elected to retain the landing threshold for Runway 20L at its present location as a "displaced threshold" because of obstructions in the approach to that runway, including trees, power lines and roads, and because of the enormous cost of land acquisition and relocation assistance for affected residents. The airport is able to maintain the required clear slope of 34:1 to the existing threshold location. The only limitation imposed by the "displaced threshold" is that aircraft landing from the northeast will not benefit from the runway extension.

An engineering evaluation was made by the FAA to determine the effects of an extension on the existing navigational aids. It was determined that the glide slope antenna would not require relocation since the landing threshold would remain at the present location. Also, evaluations were made regarding the Medium Intensity Approach Lighting System with Sequence Flashers (MALSF). Options were evaluated and it was determined that a MALSF can be modified satisfactorily in accordance with standard criteria.

The airport proprietor examined a number of alternative actions designed to achieve the objective of providing a runway capable of accommodating the "critical" aircraft. These included the alternative of extending any one of several other runways, the use of another airport, the "do nothing" alternative, and the proposed project. The selected alternative was by far the most desirable from the standpoint of feasibility and environmental concerns.

The environmental assessment was systematically examined for conformance with established FAA procedures and was found to be properly developed and to properly assess noise and other environmental impacts attributable to the proposed project. During the review process the sponsor, in response to a request by the FAA, furnished additional information and material to validate the data and findings in the assessment.

The noise analysis in the environmental assessment indicates that nearly 17,000 persons reside in areas currently exposed to noise levels at or above 65 Ldn, the range in which noise is perceived to be a problem for residential and other noise sensitive activities. Without noise mitigation measures, the analysis indicates that by 1990, about 2,500 more persons would be affected if the project is completed than if it is not. By 1995 that number would be reduced to about 1,400 persons primarily because land uses in some of the affected areas are changing from residential to commercial/industrial.

Effective noise abatement options are available in connection with the proposed project. The environmental assessment indicates there would be a significant reduction in the number of people exposed to noise levels above 65 Ldn upon implementation of an informal preferential runway use program which would utilize Runways 2R and 2L in calm wind conditions. The noise abatement benefits of this procedure will be realized only if the project is constructed. A preferential runway use program for Runways 2R and 2L was recently tested on a trial basis. The test demonstrated that use of these runways can be successfully increased with no effect on safety. There is, however, some adverse effect on airport efficiency. This adverse effect can be offset by later construction of a holding apron, additional taxiways and by the completion of the Air Traffic Control Tower currently under construction.

Additional noise mitigation can be achieved by implementation of delayed departure turns from Runway 20L. This would keep aircraft in the currently used departure tracks after the runway is extended. Implementation of this measure would not be decided upon until the safety and efficiency implications are determined through a short test period after the project is completed.

As part of the development and consideration of the environmental assessment of the proposed project, the airport sponsor is required by the established FAA procedures to provide an opportunity for public hearing on the environmental and other pertinent considerations. Accordingly, in addition to the coordination with appropriate federal, state and local governmental bodies, the airport sponsor publicized and conducted a public hearing on September 3, 1986, to provide an opportunity for the public to present for consideration their views on the economic, social, and environmental effects of the proposed project. Copies of the draft environmental assessment were available from the airport sponsor after August 4, 1986, at numerous locations through DeKalb County. In addition to the hearing, written comments were solicited for consideration through September 5, 1986. Those comments were considered by the airport sponsor in developing the final environmental assessment for submission to the FAA for review and are reflected in its documentation.

Subsequently, Congressman Pat Swindall requested representatives of the FAA and the airport sponsor to meet with him and other persons invited by him to discuss the proposed project, including the draft environmental assessment. That meeting was conducted on December 2, 1986, and was continued at a later session on February 27, 1987.

The public hearing requirements for airport development projects were fully satisfied by the process followed by the airport sponsor in this matter.

Having carefully considered the aviation safety and operation objectives of the proposed project in the light of the various aeronautical factors and judgments presented, as well as being properly advised as to the anticipated environmental impacts of the proposal, under the authority of the Administrator delegated to me, I find that the project is reasonably supported and should be processed for FAA approval for federal assistance and the subsequent procedures involving grant application, grant offer and grant acceptance. This decision, coupled with subsequent approval of the project for federal assistance, constitutes an order of the Administrator reviewable in accordance with Section 1006 of the Federal Aviation Act of 1958, as amended.

Garland P. Castleberry  
Garland P. Castleberry  
Director, Southern Region  
Federal Aviation Administration  
U. S. Department of Transportation

8/18/87  
Date

FEDERAL AVIATION ADMINISTRATION  
FINDING OF NO SIGNIFICANT IMPACT

DEKALB-PEACHTREE AIRPORT  
ATLANTA, GEORGIA

FEDERAL ACTION:

The proposed federal action is approval of a grant-in-aid project to construct and light a 1,000 foot northerly extension of Runway 2R-20L and its parallel taxiway at the DeKalb-Peachtree Airport (PDK). The project includes displacement of the Runway 20L landing threshold to its present location and flush mounting the approach lights in the new pavement for the precision instrument approach which would not be relocated to use the extended surface. The implementation of a preferential runway use program for Runway 2R as a noise mitigation measure would be a condition of FAA approval. The FAA is considering, as part of this action, implementation of delayed departure turns from Runway 20L as an additional noise abatement measure. Implementation of this procedure is subject to feasibility testing.

DESCRIPTION OF PROPOSED ACTION AND PURPOSE:

The proprietor of the DeKalb-Peachtree Airport, the DeKalb County Commission, has applied for federal assistance for a development project. The project would consist of construction of a northerly extension and lighting of Runway 20L and its parallel taxiway by 1,000 feet to a total length of 6,000 feet, with a landing threshold being displaced to the current location. The precision instrument approach to Runway 20L would remain unchanged and the approach lights would be flush mounted in the new pavement.

The purpose of the project is to provide PDK a runway that provides an enhanced margin of safety for both routine and emergency situations. Existing runways on the airport do not satisfy in every respect runway design standards for optimum safety of corporate jet operations. Those objectives can be achieved without significant adverse impacts on areas surrounding the airport from aircraft noise or economic displacement of current activity. This is achieved by displacing the landing threshold of the extended runway to coincide with the existing runway end. In so doing, this limits use of the runway extension to emergency rollout to the north and provides additional runway length for takeoff to the south without enlarging the airport property. Additional mitigation for aircraft noise can be achieved through a preferential runway use program for the airport which, in conjunction with implementation of proposed delayed turn procedures, would achieve significant noise abatement objectives.

The runway extension is neither designed nor intended to accommodate operations by aircraft larger than the ones presently using the airport. The extension would enhance the safety and efficiency of operations by these aircraft. The runway would not be strengthened and aircraft would not be allowed to depart with a gross takeoff weight above the current limitation of 66,000 pounds. Increased aviation activities that may be expected at PDK will be the result of factors that influence the number and location of operations that are not directly attributed to whether the project is completed or not.

ALTERNATIVES:

A total of 11 development alternatives were examined as part of the environmental assessment process. These included the use of another airport, extension of another runway, the "do nothing" alternative, and the proposed project, with variations on these basic alternatives.

SUMMARY OF ENVIRONMENTAL CONSIDERATIONS:

PDK is located in DeKalb County north of I-85 and inside the I-285 perimeter. The airport has four runways, two of which are on a 20 and 200 degree orientation. Runway 20L has a precision instrument approach. A new FAA air traffic control tower is currently under construction to replace the existing facility.

More than 500 aircraft are based at the airport, including 12 corporate jets. In 1986 there were 251,226 total operations at PDK, including 158,371 itinerant operations.

Noise is the most important environmental consideration, and jet activity is the dominant factor in noise impact.

The area surrounding the airport is a mixture of residential and commercial/industrial land use. Residential and commercial land uses are directly north of the airport, with commercial/industrial uses predominant in the approach to Runway 20L. Commercial/industrial development is immediately south and east of the airport, with residential development beyond. The area west of the airport is residential.

The sponsor used 1985 activity data for purposes of this assessment which was completed in November 1986 before complete calendar year statistics were available for 1986. However, some 1986 data have been used to review the assessment and validate the reasonableness of its projections for future years.

AERONAUTICAL ACTIVITY:

The environmental assessment (EA) prepared by the sponsor describes the aeronautical activity at the airport for the base year 1985, and a five-year projection to 1990 and a ten-year projection to 1995.

The EA was systematically examined for conformance with established FAA procedures. While ultimately the EA has been found to have been properly developed and to properly assess noise and other environmental impacts attributable to the proposed project, that FAA review raised some question about the data base, projections, assumptions and analysis methodology. The sponsor was requested to provide additional information and material for review to validate the data and findings in the EA.

The EA forecast predicts an increase of 18% in total operations between the base year of the assessment, 1985, and 1990. Statistics of actual operations reveal a 10.8% increase in 1986 alone (from 226,733 operations in 1985 to 251,226 in 1986). Notwithstanding, however, the forecast has been determined to be reasonable and reliable for three main reasons. Historically, records for PDK show that such annual fluctuations in activity have not been uncommon while five-year averages of activity have been relatively constant. (See Appendix A which was submitted in supplement to the EA). Historical records show similar variations in activity at the Fulton County Airport, a similar general aviation airport also serving the Greater Atlanta Area (Appendix B). The 1990 forecast contained in the assessment is 3.3% below the current FAA Terminal Area Forecast (TAF) (Appendix C; NOTE: Operations are reported by fiscal year in Appendix C and by calendar year in Appendix A; hence the slight differences in recorded statistics). The forecast for 1995 is 2.7% above the TAF. Those differences are not significant and their effect on noise curves and, thus, persons affected, is not discernable. Notwithstanding minor variations in forecasts, the same data sources were used in comparing alternatives. The incremental differences in impact among the alternatives being considered are of the most significance. Finally, the overall activity experienced for the first six months of 1987 is actually 10.4% below the same period in 1986, thereby substantially negating the apparent disproportionate increase in the 1986 figures (Appendix D). It is significant to note, as discussed below, that itinerant operations declined 8.6% during the same period.

Variations in jet operations at PDK track closely with variations in itinerant operations (Appendix E). The graph uses data obtained from operation logs of jet users at PDK (Appendix F), which represent a sampling of approximately 10% of total jet operations each month during 1985 and 1986. The correlation between itinerant and jet activity is helpful for a review and validation of the sponsor's analysis of noise impacts because it appears to verify the relationship between itinerant operations at the airport, for which data is maintained by the FAA (Appendix D), and jet operations, data which FAA does not maintain separately. The EA utilizes jet operations as the significant factor for evaluating noise impact. The FAA agrees that approach is appropriate.

A source document for the EA is the "1985 Jet Operations Report" (Appendix G). The 24% increase in jet activity in 1985 mentioned in that report occurred during a period of apparent disproportionate increase in total operations. Jet operations actually continued their increase through 1986, but at a slower rate. (The above mentioned 10% sampling of jet operations shows a 15% increase in 1986; itinerant operations increased 6%). The 8.6% decline in itinerant operations through June 1987 suggests a corresponding decline in jet operations. The use of 1985 with its high jet activity as a datum from which to project future aeronautical operations, although somewhat overstating the normal activity level, was a reasonable basis for analysis and comparisons among alternatives in which the incremental differences are the more significant indicia of comparative impacts.

The 1985 Jet Operations Report utilizes an actual count of jet operations conducted during July and November as representing "hot" and "cold" month operations, respectively. Activity statistics confirm that July and November were representative months for determining jet mix during 1985. Based on the sampling of jet operations in Appendix F, 16.5% of the year's jet operations occurred in the two month period. FAA statistics (Appendix D) show that 16.2% of total operations for the year occurred in the same period, a very close correlation which indicates July and November were, in fact, representative months. Review indicates these were months of average activity and could serve as a basis for determining the ratio of jet activity to total operations.

Table IV-1 in the EA contains a minor error in the average number of daily operations for 1985. Total average daily operations are shown as 634, not the actual 621; a difference of 2%. This difference results from an overstatement of propeller-driven aircraft operations, since jet operations in the assessment are based on monthly averages of actual count. The error is not significant because the number of jet operations represents the single most important factor in noise exposure analysis.

FAA's review of the reliability of activity data in the EA also included a comparison with FAA's own long-range forecast. The long-range forecast of "hours flown" by general aviation jet aircraft (Appendix H) shows a predicted increase of 11% between 1985 and 1990. Equating this to numbers of operations, the predicted increase of 18.7% in jet operations at PDK for the same period is much higher than FAA's estimate for the nation. This supports the conclusion that forecasts in the assessment somewhat overstate the actual noise impacts that could be expected. PDK should not have activity level increases that high above the national average.

#### IMPACTS:

All categories of potential impact have been systematically examined in the Environmental Assessment which was developed through the applicable procedures, including coordination with the appropriate federal, state, and local agencies. The assessment concluded that the project should not create impacts directly or indirectly which would exceed "thresholds of significance" and thereby trigger the need for more thorough analyses and process. All coordinating agencies agreed with the report conclusions except to the extent the Environmental Protection Agency (EPA) raised questions concerning activity forecasts and the possible need for an air quality analysis.

FAA has fully considered EPA's comments and, as discussed above, finds the activity forecasts to be reasonable and based on reliable data. EPA's comment concerning an air quality analysis indicated its apparent misunderstanding of the proposed action's potential for increasing airport capacity. FAA Order 5050.4A, "Airport Environmental Handbook", provides that an air quality analysis is not required when a proposed project will not increase airport capacity or present other special circumstances for which an analysis is appropriate. This is restated in Report No. FAA-EE-82-21, "Air Quality Procedures for Civilian Airports and Air Force Bases". This project does not increase airport capacity or present special circumstances and, thus, an air quality analysis is not required.



Some persons living and working in the areas surrounding the airport have become concerned with the potential adverse effects the proposed project would have on them and their community. Those concerns arise primarily because apparently many of them feel they are already subjected to a high level of aircraft noise and the project would cause an increase in aircraft activity and lead to the introduction of new classes of larger and noisier aircraft. The EA provides data for objectively analyzing the bases of these concerns.

Noise impact factors in the noise assessment included types of aircraft, average numbers of daytime and nighttime operations, and flight tracks. An examination of sensitive areas and population counts for the present and future were included in the assessment. None of the "thresholds of significance", which dictate additional noise analysis or procedure, were exceeded by the noise impact attributed to the project; thus, an environmental impact statement is not required.

#### MITIGATION MEASURES:

The noise exposure analysis reflected in the EA (Table IV-4) indicates that currently nearly 17,000 persons reside in areas exposed to noise levels at or above 65 Ldn, the range in which noise is recognized as being of significant perceived impact. The analysis indicates that without implementing any noise mitigation measures in 1990, about 2500 more persons would be affected if the project is completed than if it is not. However, by 1995 that comparative difference would be reduced to about 1400 persons. Several noise mitigation measures can be implemented in connection with the proposed project. A preferential runway use program has recently been used on a trial basis at the airport. Under that program, a northerly flow of traffic away from the southern noise sensitive areas was maintained whenever possible. The trial has demonstrated that the program does not affect safety at the airport and the noise analysis in the EA indicates a significant reduction in the number of people exposed to noise levels above 65 Ldn (Table IV-6), but only if the project is completed. The analysis indicates that with the program in 1990, the proposed project would not increase or decrease the number of persons affected by noise levels above 65 Ldn. Accordingly, the preferential runway use program would be an essential element to FAA's approving the project.

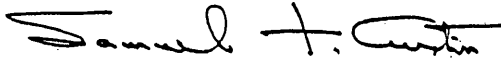
Additional noise mitigation can be achieved under the proposed federal action by implementation of delayed departure turns from Runway 20L. This would keep aircraft in the currently used departure tracks after the runway is extended. Implementation of this measure would not occur until the safety and efficiency implications are determined through a short test period after the project is completed.

Construction impacts will be mitigated by construction controls required by the FAA to prevent air and water pollution. Coordination with the appropriate state officials will be performed to assure that the project will be constructed in compliance with applicable air and water quality standards.

FEDERAL FINDING:

After careful and thorough consideration of the facts contained in the environmental assessment and reflected in the analysis above, the undersigned finds that the proposed federal action is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of the National Environmental Policy Act of 1969 (NEPA) and that it will not significantly affect the quality of the human environment or otherwise include any condition requiring additional consultation pursuant to Section 102(2)(c) of NEPA.

APPROVED:



Manager, Atlanta Airports District Office

8/17/87

Date





U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

# Memorandum

Subject: INFORMATION: Dekalb-Peachtree Airport - Proposed Runway Extension Date: **AUG 14 1987**

From: Manager, Flight Standards Division, ASO-200 Attn. of: THoffmann:7455  
Reply to

To: Manager, Airports District Office, Atlanta, GA  
ATTN: Howard Robinson  
THRU: Manager, Airports Division, ASO-600

In accordance with your request for operational information at the subject airport, the following is provided:

The comments and evaluation listed below regarding a 1000' runway extension to the northeast on Runway 20L are based on the following operational conditions:

#### Runway 20L

1. Landing - The 1000' extension cannot be used for landing.
2. Takeoff - The runway extension may be used.

#### Runway 2R

1. Landing - The extension may be used.
2. Takeoff - The extension may be used.

Landing - Runway 20L - The straight-in landing instrument approach procedures to this runway remain unaffected by the extension. During the period of time that the runway extension is under construction, the approach procedures minimums will be increased. Upon completion, they will be restored to the current value. Ref: United States Standard for Terminal Instrument Procedures (TERPS), FAA Order 8260.3B, as amended. Chapter 9 applies to Category I ILS Systems.

Departures - Runway 20L - The extension will permit departing aircraft to use the additional length in takeoff computations for balanced field length and accelerate stop and gross weight computations. Ref: Federal Air Regulation 135.169

Landing - Runway 2R - The additional runway length will help the pilot determine landing length versus gross weight for takeoff at point of departure. Ref: Federal Air Regulation 135.169.

Departures - Runway 2R - The current departure requirements will not require any amendment as no changes are required to the current IFR takeoff minimums. Ref: TERPS Chapter 12

Circling Approaches - For all categories of aircraft, the circling approach area in the NE quadrant would be extended 1000' outward from the airport. This effectively provides a greater maneuvering area. In light of the instrumentation on the preferred instrumented runway (20L), the potential for utilizing a circling approach in the affected area is very remote. Ref: TERPS Chapter 2, Section 6, Paragraph 260 a and b.

GENERAL COMMENTS: The extended runway length at the Dekalb-Peachtree Airport does increase the margin of safety for aircraft operations.

*George E. Mattem*  
For William M. Berry, Jr.



U.S. Department  
of Transportation

Federal Aviation  
Administration

# Memorandum

Subject: INFORMATION: Runway Improvement Project, Runway  
02R/20L, DeKalb-Peachtree Airport, Chamblee, GA

Date: AUG 14 1987

From: Manager, Air Traffic Division, ASO-500

Reply to  
Attn. of: Niklasson:x7646

To: Manager, Atlanta Airports District Office

The proposed project will not increase airport capacity.

The additional 1,000 feet of runway would allow 20 percent more runway for departures from both Runway 02R and 20L. It would also allow 20 percent more runway for arrivals on Runway 02R. We believe the added safety margin cannot be quantitated but represents a considerable safety consideration. The additional runway length will allow departing aircraft an added margin to decide if a take-off could be aborted and the aircraft kept safely on the ground as opposed to taking off and coping with an in-flight emergency. This predetermined go/no-go speed (V1) is based on a number of factors including runway length.

The DeKalb-Peachtree Airport is most efficient when Runways 20L and 20R are designated the "active runways." This is due to the following considerations:

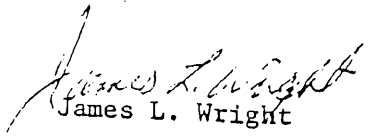
1. Taxiways that access Runways 20L and 20R allow aircraft to transition to either runway without interference from one another.
2. The approach and departure end of each runway is clearly visible from the Airport Traffic Control Tower.
3. The only precision approach at the DeKalb-Peachtree Airport is aligned with these runways.

During the period 12/20/82 through 10/31/86, an informal runway use program was in effect at the DeKalb-Peachtree Airport which designated Runway 16/34 as the preferred runway. On November 1, 1986 the program was altered to test the use of Runway 02L and 02R as the preferred runways. The percentage of use of 02L and 02R increased during the test which adversely affected airport efficiency and increased intra-facility coordination between the local and ground control positions. This program was cancelled on May 1, 1987, at the request of the Airport Director.

To increase efficiency, especially for Runway 02L and 02R, additional taxiway and runup areas would have to be constructed. The new Airport Traffic Control Tower, which is presently under construction, will provide visibility to all runways and taxiways.

While no specific air traffic activity records are kept for the number of circling approach procedures, the Air Traffic Manager advised that very few circling approaches are conducted at this airport.

We do not anticipate any revisions or modifications to local air traffic control procedures as a result of this runway improvement.

  
James L. Wright

## PART 3. AIRPORT AIRSPACE ANALYSIS

### Chapter 10. POLICY

#### 3000. INTRODUCTION

This part provides guidance and procedures for processing notices of landing area proposals submitted in accordance with FAR Part 157, Airport Improvement Program (AIP), Military Construction Program (MCP), or as otherwise received for consideration by the FAA. The provisions of this part are based upon the authority and responsibility of the Administrator under Sections 307(a), 308(b), 309, 312(a), and 313(a) of the Federal Aviation Act of 1958, as amended. In part, Section 312(a) directs the FAA to make long range plans for, and formulate policy with respect to, the orderly development and location of landing areas. The airport airspace analysis derived from an aeronautical study is an important step in achieving this goal. The results of this study are used to advise an airport proponent, in the form of a determination, as to the effect the construction, alteration, activation, or deactivation of an airport will have on the safe and efficient use of the navigable airspace by aircraft. Such advice must be developed through the aeronautical study process during which specific attention shall be given matters concerning the proposal's effect on the airspace structure and projected programs of the FAA. There are many factors which influence airport studies, and each proposal must be individually studied on its own merits. For the purpose of this part, the term airport is used as defined in FAR Part 1.

#### 3001. PURPOSE

The purpose of an aeronautical study is to determine what effect the proposal may have on compliance with the overall Airports Program and on the safe and efficient utilization of the navigable airspace by aircraft. A complete study consists of an airspace analysis, a flight safety review, and a review of the potential effect of the proposal on air traffic control and air navigation facilities. Each of these phases of the airport aeronautical study requires complete and accurate data to enable the FAA to provide the best possible advice regarding the merits of the proposal on the National Airspace System.

#### 3002. DELEGATION OF AUTHORITY

The authority for conducting the airport program is delegated to regional offices. Airport personnel shall administer the Airports Program with the coordinated assistance of Air Traffic, Airway Facilities and Flight Standards personnel.

#### → 3003. AIRPORTS OFFICE RESPONSIBILITY

Appropriate Airports Offices are responsible for the overall Airports Program, initiating studies of airport proposals, developing and forwarding the FAA determination to the airport sponsor/proponent, and, where applicable, forwarding comments regarding potential noise problems to the airport proponent/sponsor for resolution.

#### 3004. AIR TRAFFIC OFFICE RESPONSIBILITY

The appropriate Air Traffic Office is responsible for evaluating the proposal from the standpoint of safe and efficient use of airspace by aircraft. In addition based on existing and/or contemplated traffic patterns and procedures, the Air Traffic Office shall be responsible for identifying potential noise problems and advising the Airports Office accordingly.

#### → 3005. FLIGHT STANDARDS OFFICE RESPONSIBILITY

The appropriate Flight Standards Office is responsible for evaluating whether aircraft operations can be conducted safely and in accordance with applicable criteria or standards.

#### → 3006. AIRWAY FACILITIES OFFICE RESPONSIBILITY

The appropriate Airway Facilities Office will be responsible for conducting the following engineering studies:

a. Conducting engineering studies on airport proposals to evaluate their effects upon commissioned and/or proposed air navigation aids.

b. Electromagnetic studies to evaluate the effect existing and/or proposed objects will have upon air navigation and communications facilities.

c. Line-of-sight (shadow) studies on existing and or proposed objects for control tower visibility.



## Section 4. PROCESSING BY AIR TRAFFIC OFFICES

### 3240. EFFECT ON AIR TRAFFIC OPERATIONS

The Air Traffic Office shall conduct an airspace review to evaluate the effect on the safe and efficient utilization of airspace and the effect that such proposals may have on the movement and control of air traffic, associated resources (personnel, facilities and equipment), and ATC program planning.

a. The depth of the review shall be commensurate with the location, complexity, and timing of the proposed development. The measure of study necessary may vary from the need for no review for the closing of an airport reported for record purposes to the extent of effort required to process and study a proposal for a new major regional airport to serve a high density terminal area.

b. An airspace review shall be conducted for airport projects reported in compliance with Part 157, for Federal agreement airport plans; for military construction projects, and at any other time deemed necessary for assessing the utilization of airspace. Include studies associated with existing airports and with disposal of Federal surplus real property for public airport purposes, as appropriate.

c. Upon completion of the airspace review, forward consolidated regional airspace finding in letter form to the Airports Office. The airspace finding shall be either an approval or disapproval of the use of the airspace associated with airport layout plans and Federal agreement airport projects, and in the form of no objection without conditions, no objection provided certain conditions are met, or objectionable for other type airport projects. Clearly state in the finding the reasons why the proposed use of associated airspace is disapproved or objectionable. If the finding is conditional, also clearly state the conditions. Care must be exercised when issuing conditional findings. When the conditions are such that a substantial adverse affect would result if not corrected (such as the blocked view to a portion of the movement area from the air traffic control tower), then an objectionable or disapproval finding should be issued. Include a statement in the finding that the FAA will reconsider the proposal after provisions are made to resolve the objectionable conditions.

### → 3241. COORDINATION

The Air Traffic Office shall coordinate airport proposals with other affected air traffic offices and facilities as appropriate.

a. Projects contemplated at airports served by an airport traffic control tower or flight service station

must be coordinated with the facility manager or his representative prior to arriving at a finding. Such coordination may be effected by any appropriate means in reference to the timing or complexity of the project. Suitable documentation of the coordination shall be entered in the case file.

b. Military airport proposals which are not part of the Military Construction (MCP) are normally submitted to Regional Air Traffic Offices through the Regional Military Representatives. Those proposals shall be processed in the same manner as civil proposals except that the Air Traffic Office is responsible for coordinating the proposals with the Airports, Flight Standards, and Airway Facilities Offices. The Air Traffic Office is also responsible for any coordination necessary with the military regarding the proposal and issuance of the regional determination.

c. Request the Airports Office to coordinate and negotiate with the sponsor of all civil airport proposals to resolve any problems. The Airports Office may request the Air Traffic Office to assist in the negotiation if the problem relates to the safe and efficient utilization of the airspace.

### 3242. CIRCULARIZATION

The Air Traffic Office shall circularize airport proposals as necessary, in accordance with nonrulemaking procedures, for the purpose of obtaining comments from aeronautical interests, municipal, county and state groups, civic groups, military representatives, and FAA facilities and offices if the proposal is within their areas of responsibility. All controversial proposals or those that have a potential adverse effect on the users of the airspace should be circularized. However, do not circularize a proposal without prior coordination with the Airport Office to assure that circularization will not compromise the sponsor's position in land acquisition negotiations.

### → 3243. EVALUATE COMMENTS AND AERONAUTICAL EFFECT

The Air Traffic Office shall examine comments received in response to coordination and evaluate their validity as related to the safe and efficient use of airspace and to the safety of persons or property on the ground. If appropriate, request the Airports, Flight Standards, and Airway Facilities Offices to assist in evaluating the validity of these comments as well as the comments received from other FAA facilities and offices. The guidelines in Chapter 12 will assist in evaluating the aeronautical effect of airport proposals.

**3244. INFORMAL AIRSPACE MEETINGS**

The appropriate Air Traffic Office may convene an informal airspace meeting with interested parties as set forth in Part 1. Such meetings provide the opportunity to gather additional facts relevant to the aeronautical effect of the proposal, provides interested persons an opportunity to discuss aeronautical objections to the proposal, and provides the FAA with the opportunity to negotiate a resolution to objectionable aspects of the proposal.

**3245. AIRPORT TRAFFIC PATTERNS**

If the appropriate VFR or IFR traffic pattern airspace area requirements overlap or if airspace requirements cannot be developed to accommodate the category and volume of aircraft anticipated at an existing or planned airport, the airport, in all cases, need not be found objectionable from an airspace utilization standpoint. Adjustments to traffic patterns can be made, such as establishing nonstandard traffic patterns, assigning specific traffic pattern altitudes, and/or developing special operational procedures. Should such action be necessary, in all probability, the capacity, operational flexibility, and compatibility of the airports involved will be reduced. The Air Traffic Office is responsible for determining the degree of incompatibility based largely upon the amount of airspace area overlap for a given condition.

If the airport proposal would cause a traffic pattern conflict with an adjacent airport which could be eliminated by adjusting the traffic pattern of the airport proposal only (change of pattern direction), the Air Traffic Office will specify the traffic pattern to be used as a condition of the determination. When adjustment to an adjacent traffic pattern is necessary to resolve the conflict and such adjustment can be made without resulting in an undesirable pattern, the Air Traffic Office shall be requested to assist the Airports Office in negotiating with the adjacent airport owner/manager for agreement in writing to the traffic pattern adjustment. If a non-standard traffic pattern adjustment is made at a public-use airport with other than a full-time control tower, then visual indicators are required at the airport in accordance with Advisory Circular Number 150/5340-5, Segmented Circle Airport Marker System. If night operations are conducted or planned at the airport, then floodlighting of the segmented circle is necessary.

**→ 3246. FAR, PART 77 REVIEW**

Review proposed structures and existing terrain or objects that exceed Part 77 obstruction standards to determine the extent of adverse effect and obstruction marking/lighting requirements. If the review indicates any obstructions that are potential hazards to the airport proposal, then coordinate and attempt resolution with the Airports, Flight Standards, and Airway Facilities Offices prior to forwarding the airspace finding to the Airports office. The airspace use associated with a new airport or airport alteration proposal should normally be considered as objectionable (or disapproved for AIP) if the study discloses a hazardous condition, except when the airport sponsor/owner does affect action that removes the hazardous effect.

**→ 3247. DESIGNATION OF INSTRUMENT RUNWAY/  
CHANGE IN AIRPORT STATUS VFR TO IFR**

The processing required by Air Traffic Offices depends upon the action necessary for establishment of the instrument approach procedure. This can involve the establishment of air navigation aids, nonrule or rulemaking circularization and associated actions, need for communications, weather reporting and capability of providing air traffic control service. In conducting the airspace review, determine the practicability of establishing a reasonable instrument approach procedure and the acceptability of the airport environment for the proposed procedure. Also, evaluate the effect of the proposed procedure on existing or proposed IFR or VFR aeronautical operations at the airport in question and/or adjacent airports. Be particularly alert to previously issued no objection determinations which included a provision for VFR-only operations. Forward the finding to the responsible office. (See paragraph 3014.)

**→ 3248. ONSITE EVALUATION**

The need for onsite evaluations will be determined by the airspace review results. Onsite evaluations may especially be necessary when the review indicates the presence of unsafe conditions. The Air Traffic Office should assist the Airports and Flight Standards Offices in the onsite evaluation as appropriate for arriving at a finding.

**3249-3299. RESERVED.**

Date: 2/8/99 4:35 PM  
Sender: Lee Kyker  
To: Scott Seritt  
cc: Terry Washington; Rans Black  
Priority: Normal  
Subject: Re: PDK - Rwy 20L pavement strength  
Scott:

---

In regards to the FONSI (dated 8/17/87) for the runway extension, the FONSI states "the runway extension is neither designed nor intended to accommodate operations by aircraft larger than the ones presently using the airport." (See FONSI, page 1, last paragraph) While the statement was not made to intentionally limit the weight of aircraft that can use the runway, I believe it does just that in that our environmental finding was based on this premise of a 66,000 gross takeoff weight limitation. Further, the noise analysis was based on aircraft weighing less than 66,000 lb. Heavier aircraft were not considered.

Within the EA, references to the weight bearing capacity of the runway can be found on page III-1, III-3, IV-14 & 16, and VI-7.

Lee

Reply Separator  
Subject: PDK - Rwy 20L pavement strength  
Author: Lee Kyker  
Date: 2/5/99 4:29 PM

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I spoke to Mr. Rimmel and requested a copy of the pavement study. He'll have Bill Tudor drop one off on the way home from work in the next few days.

I inquired as to the heaviest aircraft or most pavement stressing aircraft currently using the facility and he said it was a G-V at 90,500 lbs. He mentioned that the Global Express will be coming out soon which is at 93,500 max. gross takeoff weight.

The currently approved ALP for PDK shows:  
ARC - C-II existing & ultimate  
Pavement Strength - 46,000 S for existing and the same shown for ultimate  
66,000 D

In checking the Design AC, all C-II aircraft listed have a max takeoff weight less than the 105,000 lb requested. There are a few heavier aircraft in the C-III category that weigh less than the 105,000 lb.

**\*\*Reminder\*\***

We have encouraged the airport to do an ALP update. At such time, we need to have them address the issue of less than a 700' separation between parallel runways which operate under simultaneous VFR operations. They have a 500' separation. We need to consider what possible impacts this pavement strength issue could raise in this regard.

Per Scott's inquiry, I checked to see if we've had any runway strengthening grants. The runway is concrete- we did some rehabilitative work in Aug '92 but it was limited to sealing cracks & repairing spalls and resealing transverse & longitudinal joints.

Scott to discuss environmental questions raised with Mr. Brill.

Lee



# MEMORANDUM

This communication is confidential and protected by the attorney-client privilege and attorney work product rule. It is intended only for the use of the individual or entity to which it is addressed. Dissemination or distribution to persons or entities not directly involved with the subject matter on behalf of the County is prohibited.

August 20, 2002

To: Vernon Jones, Chief Executive Officer  
Members, Board of Commissioners

Through: Charles G. Hicks, County Attorney *CHK*

From: Vivica M. Brown, Assistant County Attorney *VMB*

Subject: Aircraft Weight Restrictions at DeKalb-Peachtree Airport  
(Our File No. 02-0035)

During the Board of Commissioners' meeting of August 13, 2002, questions arose about the weight limitation for aircraft landing at DeKalb-Peachtree Airport ("PDK"). In particular, there was discussion about an alleged court order that placed a weight limit on landing aircraft. As a result of that discussion, this memorandum is provided for your review.

## QUESTIONS PRESENTED:

1. Is there a court order prescribing a weight limitation for aircraft landing at PDK airport.
2. Are there federal regulations or county codes prescribing weight limitations for aircraft landing at PDK Airport.

## SHORT ANSWERS:

1. No. In *CARE Now, Inc. v. FAA*, the U.S. Court of Appeals for the Eleventh Circuit, addressed a case which involved legal issues at PDK, but the court did not reach a legal conclusion regarding weight limitation for aircraft landing at PDK Airport. It merely made reference to and summarized specific language contained in the County's proposal for a runway extension.<sup>1</sup> The County was not a party to the case.

The Law Department does not have possession of, nor has it reviewed the actual proposal but rather it relies upon the Court's reference to language included in the proposal.

2. No. There are no County codes or federal regulations that place a weight restriction on aircraft landing at PDK. A runway's weight capacity is determined by the physical limitations of the operational runway and not by the FAA or County code.

**DISCUSSION:**

In May 1988, the U. S. Court of Appeals, 11<sup>th</sup> Circuit, heard a petition filed by Citizens Against Runway Extension Now ("CARE Now").<sup>2</sup> The action was brought against the Federal Aviation Administration ("FAA"). The petitioner, CARE Now, asked the Court to review, among other issues, whether the FAA's finding of no significant impact ("FONSI") on the environment with regard to a runway extension was reasonable. If the court found that the FONSI determination was that the runway significantly impacted the environment, then a national environmental policy act ("NEPA") environmental study would have been required.<sup>3</sup> DeKalb County was not a party to the lawsuit, however, the petition did involve a DeKalb County proposal for a runway extension at PDK Airport.<sup>4</sup> For purposes of this discussion, the relevant portion of the FONSI report included a review of the runway's impact on projected noise increases. CARE Now's contention was that the FONSI determination did not consider the possibility that the runway extension would provide a way for larger, heavier aircraft to land.<sup>5</sup> They further contended that larger, heavier aircraft landing at PDK would lead to an increased noise impact on the surrounding community. Further, "to support this contention, the petitioners cite[d] statistics that forecast[ed] significant increases in airport traffic in the upcoming years."<sup>6</sup> The court was not persuaded and, therefore, the petition for review was denied.

The court understood that PDK would experience increased traffic [and noise] whether the runway was extended or not. The court opined that "the numbers of those type[s] of aircraft [permitted to land at PDK] will inevitably increase given the growth of the Atlanta area."<sup>8</sup> "The effect of the runway extension on the number and size of aircraft that use PDK, however, is insignificant."<sup>9</sup> Admittedly, the court makes reference to the fact that the County's then-

<sup>2</sup> The 11<sup>th</sup> Circuit has jurisdiction to review the FAA's final order pursuant to Section 1006 of the FAA Act, 49 U.S.C. § 1486. The FAA's final order concluded that the mitigation measures taken to reduce potential environmental impact to an insignificant level was reasonable.

<sup>3</sup> CARE Now probably hoped that a NEPA environmental study would provide a further opportunity to demonstrate their position that the runway extension project significantly impacted the environment.

<sup>4</sup> *CARE NOW, Inc. et al. v. FAA*, 822 F.2d 1569 (11th Cir. 1988)

<sup>5</sup> *Id.* at 1573.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* It is possible that the Court refrained from specifically limiting the aircraft weight due to its understanding of the Atlanta area's anticipated growth.

<sup>9</sup> *Id.*

Memorandum to Vernon Jones, Chief Executive Officer  
Members, Board of Commissioners

August 20, 2002

Page 3 of 3

proposal, not policy, for the extension of the runway "expressly maintains the current weight limitation of 66,000 pounds."<sup>10</sup>

The court, however, never made a legal determination that the weight of landing aircraft at PDK was limited to 66,000 pounds. It simply referenced the County's representation of its then-current loading requirement of 66,000 pounds. In fact, the runway could accommodate the flight operations of aircraft whose total gross weight exceeds 66,000 pounds. Lee Rummel, Director, PDK Airport, previously informed the Law Department, that the Airport's longest runway can accommodate aircraft with a gross weight of up to 105,000 pounds.

In a memo dated April 7, 1999, then-CEO Liane Levetau implemented an administrative policy that required aircraft over the maximum gross take-off weight of 66,000 pounds to obtain prior authorization for take-offs and landings from the airport director. This policy, however, was in contradiction of Section 6-93 of the Code of DeKalb County and was, we believe, legally ineffective in its attempt to override the official, codified county policy of Section 6-93. Section 6-93 reads:

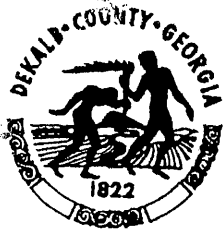
Prior authorization is required before airships, dirigibles, blimps, gliders, free balloons, motorless aircraft or aircraft with a total gross weight in excess of seventy-five thousand (75,000) pounds land or take off at the airport.

Thus, aircraft with a gross weight in excess of 75,000 pounds are authorized to operate in and out of PDK, with the only limitation being prior authorization from the airport director and the ability of the operational taxiways and runways to accommodate such aircraft.

VMB/vmb

cc: Richard Stogner, Executive Assistant  
Lee Rummel, Director, Airport (PDK)  
Viviane H. Ernestes, Chief Assistant County Attorney

<sup>10</sup> *Id.* It appears that the County had limited foresight at the preparation of the proposal but obviously the Court understood the potential growth possibilities.



# MEMORANDUM

This communication is confidential and protected by the attorney-client privilege and attorney work product rule. It is intended only for the use of the individual or entity to which it is addressed. Dissemination or distribution to persons or entities not directly involved with the subject matter on behalf of the County is prohibited.

March 16, 2001

To: Judy Yates, Commissioner, Super District 6, Board of Commissioners

Through: Charles G. Hicks, County Attorney *CHH*

From: Shannon McNeal, Assistant County Attorney *SM*

Subject: **Review/Leases/Permits/Weight**  
(Our File No. 02-0035)

This memorandum is in response to your request for the Law Department to review the current policies and regulations in effect at DeKalb Peachtree Airport regarding aircraft in excess of 75,000 pounds.

Currently the DeKalb County Code in Section 6-93 requires that any aircraft in excess of seventy-five thousand (75,000) pounds obtain prior authorization for any take off or landing at the Airport.

Pursuant to the standard notice letter sent to the registered owners of aircraft landing at DeKalb Peachtree Airport without permission, it appears<sup>1</sup> that the County policy concerning DeKalb County Code Section 6-93 (2000) is as follows:

"Any aircraft with a maximum gross certificated take off weight of more than 75,000 pounds must receive prior authorization before each arrival and departure."

Prior authorization is granted when the aircraft calls the Airport office with the date and time of the proposed operation. The only denial of such authorization occurs when the proposed take off or landing time falls within the voluntary curfew period from 11:00 p.m. to 6:00 a.m. each day.<sup>2</sup>

<sup>1</sup> The Airport has not been consulted in the preparation of this memorandum. All questions regarding Airport policy are more appropriately addressed by making a direct inquiry to the Airport.

<sup>2</sup> See attached correspondence between Airport and registered owners of aircraft over 75,000 pounds.

03/20/01

**Memorandum to Commissioner Yates**

**March 16, 2001**

**Page 2 of 2**

The Law Department is not aware of any legal prohibition which would prevent the County from adopting formal procedures to authorize aircraft over 75,000 pounds to use the Airport and to track usage of the Airport by such aircraft.

However, to date the Law Department has not reviewed the federal grant assurances which the County has made to the FAA when accepting funds for improvements at the Airport and for the Airport property itself.<sup>3</sup> The federal grant assurances and federal advisory and letter opinions may establish that the County cannot restrict use of the Airport simply on the basis of weight of an aircraft without risking the loss of federal funds or requiring the County to repay all past monies received from the federal government at the Airport.

SDM/pew  
Attachment

cc: Richard Stogner, Executive Assistant  
Lee Rimmel, Director, Airport (PDK)  
Joan F. Roach, Chief Assistant County Attorney

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<sup>3</sup> The Law Department has requested these documents from the Airport and, if requested, the Law Department will issue a revised opinion regarding these assurances and the current policy on aircraft over 75,000 pounds.



C.A.R.E. Now, Inc., Jerry P. Cram, Charles L. Feltus and Robert Lundsten,  
Petitioners, v. Federal Aviation Administration, Respondent

No. 87-8784

UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

844 F.2d 1569; 1988 U.S. App. LEXIS 6495; 18 ELR 21081

May 18, 1988

**SUBSEQUENT HISTORY:** [\*\*1]

Rehearing and Rehearing In Banc Denied July 25, 1989. Reported at: 854 F.2d 1326, 1988 U.S. App. Lexis 19112.

**PRIOR HISTORY:** Petition for Review of an Order of the Federal Aviation Administration.

**DISPOSITION:**

Petition for review is denied.

**LexisNexis (TM) HEADNOTES - Core Concepts:**

**COUNSEL:**

H. Wayne Phears, Phears & Dailey, Norcross, Georgia, Michael A. Dailey, George E. Butler, II, Atlanta, Georgia, Attorneys for Appellant.

Elizabeth Ann Peterson, Appellate Section, Dept. of Justice, Lands & Natural Resources Div., Washington, District of Columbia, Sharon Douglas Stokes, AUSA, Atlanta, Georgia, Attorneys for Appellee.

**JUDGES:**

Johnson and Hatchett, Circuit Judges, and Eschbach,  
\* Senior Circuit Judge.

\* Honorable Jesse E. Eschbach, Senior U.S. Circuit Judge for the Seventh Circuit, sitting by designation.

**OPINIONBY:**

HATCHETT

**OPINION:**

[\*1570] HATCHETT, Circuit Judge.

C.A.R.E. Now, Inc., a citizens group, petitions this court to review the Federal Aviation Administration's (FAA) order approving a runway extension at DeKalb-Peachtree Airport (PDK). The petitioner urges this court to closely review the FAA's "Finding of No Significant Impact" (FONSI) on the environment. n1 We review only to determine if the record [\*\*2] supports the critical findings and if the agency's decisions were reasonable. Because we find that the FAA decision was reasonable, we deny the petition for review.

n1 We have jurisdiction to review the FAA's final order under section 1006 of the Federal Aviation Act, 49 U.S.C. § 1486.

**FACTS**

Petitioner, C.A.R.E. Now, Inc., (Citizens Against Runway Extension Now) is a non-profit civic organization consisting of homeowner associations and neighborhood groups in areas encircling PDK. Petitioners Jerry P. Cram, Charles L. Feltus, and Robert Lundsten are individual petitioners residing in neighborhoods near PDK. The petitioners oppose a proposal which would at PDK extend runway 2R-20L by 1,000 feet. The DeKalb County Commission originally

proposed the runway extension. The FAA supports the proposal and will provide financial assistance for its completion.

[\*1571] The proposal includes the 1,000-foot runway extension, a corresponding extension of the parallel taxiway, and the installation [\*\*3] of approach lights in the new pavement. The proposal explicitly maintains the current loading requirement of 66,000 pounds dual wheel. The purpose of the extension is to provide an increased margin of safety on runway 2R-20L. Although corporate jets currently use runway 2R-20L, the existing runway length of 5,000 feet is insufficient to satisfy optimum safety requirements for corporate jet operations. Aircraft approaching from the northeast will not benefit from the runway extension because of trees, power lines, and roads which obstruct the approach to that runway.

The proposal to extend the runway comes in a context of greater growth and expansion at PDK. In 1978, the FAA funded and approved a long-range plan for PDK. This plan designated PDK to become the primary general aviation reliever airport for Atlanta's Hartsfield International. Pursuant to this plan, the FAA funded the installation of a precision instrument landing system to accommodate significantly increased jet traffic at PDK. In addition, the north terminal area of PDK underwent a major expansion. A new air traffic control tower is also currently under construction.

#### PROCEDURAL HISTORY

In 1985, DeKalb County presented [\*\*4] an airport layout plan which recommended the runway extension. The FAA approved the airport layout plan. In order to comply with the National Environmental Policy Act of 1969 (NEPA), DeKalb County hired a private consulting firm to prepare an environmental assessment (EA) to ascertain the project's impact on the environment. The EA predicted that noise exposure levels surrounding PDK would increase from 16,800 to 19,300 persons because of the runway extension over the 5-year period following completion of the extension. To mitigate the increased noise exposure, the EA proposed two measures. The first was an informal preferential runway use program designed to reduce the number of jets taking off in a southerly direction over the most dense residential populations.

The second mitigation measure was the delayed departure procedures program in which aircraft departing to the south would begin takeoff 1,000 feet farther north than the current takeoff point. By beginning takeoff at a point 1,000 feet farther back, the aircraft would be able to gain a higher altitude before reaching populated areas thereby reducing the severity of the noise level in residences directly beneath the aircraft. [\*\*5] Despite

the decrease in the overall noise level caused by this mitigation measure, the EA concluded that the higher altitude would mean a broader range of noise dispersion, causing an additional 300 homes to be impacted by noise levels considered disruptive. The EA further concluded that air quality would not be significantly impacted because the proposed project would not increase airport capacity.

On September 3, 1986, approximately 2,000 citizens attended a public hearing conducted by DeKalb County and submitted 3,500 comments. In November, 1986, DeKalb County filed the final EA.

After analysis of the methods employed and the conclusions drawn in the EA, the FAA issued its finding of no significant impact (FONSI). The FONSI noted that the EA had adequately discussed eleven development alternatives, including the alternatives of the use of another airport, the extension of another runway, the "do nothing" alternative, and variations and combinations of each of these alternatives. The FONSI also concluded that the EA complied with established FAA procedures in its methodology. Although the FAA raised questions about the EA's estimation of total increased airport capacity in the [\*\*6] next five years, the accuracy of these estimations was not critical to determine the impact on the environment caused *solely* by the runway extension. The FAA did not dispute the EA's conclusions regarding only those impacts which were the result of the expanded runway. In this regard, the FONSI adopted the EA's conclusion that [\*1572] approximately 2,500 more persons would be affected upon completion of the project. Implementation of the EA's proposed mitigation measures, however, would abate that increased exposure.

The petitioners found the FONSI inadequate and therefore filed this petition for review. Specifically, petitioners assert that the proposal creates a reasonable possibility of a significant impact on the human environment, requiring the preparation of an environmental impact statement (EIS) under NEPA. In addition, the petitioners assert that the Airport and Airway Improvement Act of 1982 (AAIA) requires that the FAA render written findings that (1) no feasible alternative exists and (2) that all reasonable steps have been taken to minimize adverse effects, whenever a major runway extension having a significant impact on natural resources is constructed. 49 U.S.C. § 2208 [\*\*7] (b)(5). The petitioners further contend that the FONSI failed to address several available alternatives, failed to consider the cumulative impacts of the extended runway in the context of other improvements, and unfairly relied on speculative mitigation measures.

#### ISSUES

The issues are: (1) whether the impacts as presented by the FONSI were "significant" so as to require an environmental impact statement pursuant to NEPA; (2) whether the FONSI was deficient because the FAA failed to determine whether prudent alternatives to the project existed; (3) whether the FONSI was deficient because the FAA failed to consider the cumulative impact of past, present, and reasonably foreseeable actions in finding that the project would not significantly impact the environment; and (4) whether the FAA erred in considering speculative mitigation measures in concluding that the project would have no significant impact on the environment.

#### DISCUSSION

Section 102(2)(C) of NEPA, 42 U.S.C. § 4332(2)(C), requires a federal agency to prepare an environmental impact statement (EIS) when a major federal action significantly affects the quality of the human environment. n2 The object [\*\*8] of NEPA is to require federal agencies to consider environmental values when making decisions. The initial responsibility of the federal agency is to determine the extent of the impact. An environmental assessment (EA) is an authorized tool for determining the extent of the environmental impacts. 40 C.F.R. § 1508.9(a)(1). If the EA concludes that the impacts are significant, the agency must prepare an EIS. In determining whether the impact is significant, the agency has broad discretion. This discretion is not unlimited, however, and this court must review the agency's finding under a standard of reasonableness, not under the narrower standard of arbitrariness or capriciousness. *Manasota-88, Inc. v. Thomas*, 799 F.2d 687, 691 (11th Cir.1986); *Save Our Ten Acres v. Kreger*, 472 F.2d 463, 465 (5th Cir.1973). n3

n2 Title 42 U.S.C. § 4332(2)(C), in pertinent part, provides:

The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this chapter, and (2) all agencies of the Federal Government shall--

....

(C) include in every recommendation or report on proposals for legislation and other major federal actions significantly affecting the quality of the human

environment, a detailed statement by the responsible official on--

(i) the environmental impact of the proposed action,

(ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,

(iii) alternatives to the proposed action,

(iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and

(v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

[\*\*9]

n3 Generally, judicial review of agency action is governed by the Administrative Procedure Act, specifically 5 U.S.C. § 706(2)(A) under which "the reviewing court shall . . . set aside agency actions, findings and conclusions found to be--arbitrary, capricious, an abuse of discretion or otherwise not in accordance with law." *Manasota-88* and *Kreger* require a higher degree of scrutiny by the standard of reasonableness, however, when the agency decision is not to prepare an EIS under NEPA. In addition to the Fifth and Eleventh Circuits, the Eighth, Ninth, and Tenth Circuits employ the reasonableness standard in reviewing an agency's decision not to prepare an EIS. *Winnebago Tribe of Nebraska v. Ray*, 621 F.2d 269, 271 (8th Cir.), cert. denied, 449 U.S. 836, 101 S. Ct. 110, 66 L. Ed. 2d 43 (1980); *Foundation for North American Wild Sheep v. U.S. Department of Agriculture*, 681 F.2d 1172, 1177-78 (9th Cir. 1982); *Park County Resource Council, Inc. v. U.S. Dept. of Agriculture*, 817 F.2d 609 (10th Cir.1987). The First, Second, Fourth, and Seventh Circuits, however, employ the arbitrary and capricious standard of review in EIS cases. *Grazing Fields Farm v. Goldschmidt*, 626 F.2d 1068, 1072 (1st Cir.1980); *Hanly v. Kleindienst*, 471 F.2d 823, 828-29 (2d Cir.1972), cert. denied,

412 U.S. 908, 93 S. Ct. 2290, 36 L. Ed. 2d 974 (1973); *Webb v. Gorsuch*, 699 F.2d 157, 160 (4th Cir.1983); *Nucleus of Chicago Homeowners Ass'n v. Lynn*, 524 F.2d 225, 229 (7th Cir.1975), *cert. denied*, 424 U.S. 967, 96 S. Ct. 1462, 47 L. Ed. 2d 734 (1976).

[\*\*10]

[\*1573] I.

The petitioners contend that the FAA applied an incorrect standard in determining whether an EIS was required. Specifically, petitioners argue that the FAA required a showing of certainty of environmental harm rather than a reasonable possibility that the project would cause significant environmental impact. *Kreger* at 467 ("if the court finds that the project *may* cause a significant degradation of some human environmental factor . . . the court should require the filing of an impact statement"). Contrary to petitioners' contention, the FONSI speaks in terms of "potential impact." In fact, the FONSI conceded the possibility that an additional 2,500 persons would be exposed to noise levels in the disruptive range if the project were completed without mitigation measures. n4 The FAA employed methods for projecting potential impact which were legally adequate. *See City of Aurora v. Hunt*, 749 F.2d 1457, 1462 (10th Cir.1984) (courts owe great deference to an agency's methodology in its area of expertise); *Sierra Club v. U.S. Dept. of Transportation*, 243 U.S. App. D.C. 302, 753 F.2d 120, 128 (D.C.Cir.1985) (clearly within the [\*11] expertise and discretion of the agency to determine proper testing methods).

n4 The level at which noise is determined to be disruptive is at or above 65 Ldn. An Ldn is a measure for noise level which takes into consideration the increased annoyance from nighttime noise. Seventy-five Ldn is considered a severe annoyance. At 65 Ldn, more than 50-percent of exposed people said they were occasionally awakened by the noise. Forty percent said the noise kept them from going to sleep. DeKalb County EA, Appendix B.

The petitioners also contend that the FONSI's projected noise increases do not consider the possibility that the runway extension will pave the way for larger classes of aircraft and heavier loads by the currently authorized aircraft. To support this contention, the petitioners cite statistics that forecast significant increases in airport traffic in the upcoming years. These data, however, are not persuasive because PDK will experience increased traffic regardless of whether the

runway is extended. Furthermore, [\*12] the proposal expressly maintains the current weight limitation of 66,000 pounds. The proposed runway extension is not designed to accommodate operations by aircraft larger than the ones currently using PDK. Therefore, the petitioners' fear that the runway extension will cause a significant impact because of the introduction of larger types of aircraft and heavier loads is unjustified. The primary consequence of the runway extension will be enhanced safety for the types of aircraft which currently use PDK. The numbers of those types of aircraft will inevitably increase given the growth of the Atlanta area. The effect of the runway extension on the number and size of aircraft that use PDK, however, is insignificant.

Because the runway extension will not be the cause of the increase in airport capacity, the extension will not have a significant impact on air quality. The AAIA standard for requiring the FAA to render written findings is identical to the NEPA standard: that the runway extension have a "significant impact on natural resources." Therefore, the FAA's findings also withstand the petitioners' AAIA attack. We hold that the FAA reasonably [\*1574] concluded that the [\*13] proposed runway extension would have no significant impact on the human environment.

## II.

Petitioners also contend that the FAA's analysis of the proposal failed to consider the full spectrum of alternatives in reaching its conclusion. They argue that the FONSI did not consider all the alternative forecasts of growth at PDK. The petitioners' argument that the FAA's growth estimates for PDK were understated is misguided because the runway expansion will not be the cause of the growth or decline of PDK. The total future growth of PDK is not the issue in this case. Rather, it is that portion of the growth that will be caused by the runway extension alone. Therefore, the petitioners' argument that alternative forecasts of future growth at PDK should have been used in determining whether the project would significantly impact the environment is without merit.

The petitioners also contend that the most reasonable alternative to the proposed project would be a graded and grassed overrun equal in length to the proposed runway extension. The FAA considered this "do nothing" alternative. With the project, a substantial number of aircraft will be able to take off from a position 1,000 feet [\*14] farther back than previously possible. Therefore, these aircraft will be able to gain a higher altitude before reaching many of the exposed neighborhoods, thereby reducing the severity of the noise level. When compared with the "do nothing" alternative and considered in light of other mitigating factors, the

FAA concluded that the proposal will actually result in a decrease in the severity of the noise level.

The petitioners also contend that the FAA failed to adequately consider lengthening a parallel, but shorter, runway by 2,261 feet. Currently, this alternate runway cannot support jets. Not only would this alternative be more expensive because it requires more than double the extension, but also this alternative would supply PDK with double the capacity to accommodate jets. Two runways capable of handling jets would increase airport capacity resulting in adverse environmental impacts. Therefore, the FAA rejected this alternative. Eleven alternatives were considered. Our task is not to choose the best alternative, but to ascertain that the FAA made a "reasoned choice" among these alternatives. *Life of the Land v. Brinegar*, 485 F.2d 460, 472 (9th Cir.1973), [\*\*15] cert. denied, 416 U.S. 961, 94 S. Ct. 1979, 40 L. Ed. 2d 312 (1974) (discussion of only four alternatives sufficient as long as those alternatives are "sufficient to permit a reasoned choice"). We hold that the FAA adequately considered the comparative merits of all alternatives and made a reasoned choice in favor of the proposal.

### III.

NEPA requires that a federal agency examine not only the impact directly attributable to one project, but also the cumulative effects of that project. Cumulative effects are defined to be the impact on the environment which results "from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." 40 C.F.R. § 1508.7. Cumulative effects can be both direct and indirect. 40 C.F.R. § 1508.8; *Fritiofson v. Alexander*, 772 F.2d 1225 (5th Cir.1985). Petitioners claim that the FAA viewed the runway extension in isolation instead of viewing it in the context of a broader expansion plan for PDK. Specifically, the petitioners cite the introduction of the precision instrument landing [\*\*16] system which heightened jet traffic in the late 1970's and early 1980's. Petitioners also claim that the increased length of the runway will foreseeably lead to the introduction to PDK of larger aircraft and heavier loads. Petitioners argue that ten years of development at PDK, without the preparation of a single EIS, have proceeded absent any analysis of the cumulative impacts of the expansion in whole. The terms of the proposed runway extension, however, forbid the introduction of new [\*1575] types of aircraft and heavier loads. This proposal is unrelated to previous projects which adapted PDK for jets because the current length of the runway is already sufficient, though marginally safe, to support jets. Because cumulative impacts include only the indirect and direct effects caused by a project,

speculation as to the use of PDK by larger types of aircraft and heavier loads could never be a cumulative effect because the proposal itself forbids that effect. Furthermore, an increase in capacity is inevitable at PDK given the projected growth of Atlanta and the strain on Atlanta's Hartsfield International. This increased growth at PDK is not attributable to an extended [\*\*17] runway. The effect caused by the runway extension will be a higher percentage of safe landings, not a higher number of planes landing. We hold that the FAA's limited analysis of cumulative effects was warranted given the limited effect, direct or indirect, of the proposal.

### IV.

Finally, the petitioners contend that the FAA's consideration of mitigation measures was too speculative to offset the admitted increase in noise exposure due to the project. Both sides agree that absent the mitigation measures, the project will cause an additional 2,500 people to be subjected to disruptive noise levels. The petitioners would discount any reliance on the mitigation measures because these measures are voluntary programs. In fact, however, at least one mitigation measure, the preferential runway use program, has been used experimentally already and found manageable. Runway extension will allow fuller implementation of this program. Upon full implementation, noise levels are predicted to decrease from existing levels by 10-percent.

When mitigation measures compensate for otherwise adverse environmental impacts, the threshold level of "significant impacts" is not reached so no EIS is required. [\*\*18] *Cabinet Mountains Wilderness/Scotchman's Peak Grizzly Bears v. Peterson*, 222 U.S. App. D.C. 228, 685 F.2d 678, 682 (D.C. Cir.1982). Agency consideration of voluntary noise abatement programs as mitigation to potentially adverse environmental impacts is appropriate. *Sierra Club v. United States Dept. of Transportation*, 243 U.S. App. D.C. 302, 753 F.2d 120, 129 (D.C.Cir.1985). The FAA's findings impose these mitigation measures on DeKalb County as conditions precedent to the construction of the runway extension. This court must consider these mitigation measures because they were imposed as conditions of the agency action. *Louisiana v. Lee*, 758 F.2d 1081, 1083 (5th Cir.1985). FAA consideration of the mitigation measures was not only appropriate, but required. The mitigation measures will reduce the overall noise level for the majority of residents. The delayed departure procedures program, however, will increase the number of families exposed to this overall reduced noise level because aircraft at higher altitudes disperse noise across a broader range. We hold that the FAA finding that the mitigation measures reduce the potential [\*\*19] environmental impact to an insignificant level was a reasonable conclusion.

844 F.2d 1569, \*; 1988 U.S. App. LEXIS 6495, \*\*;  
18 ELR 21081

In conclusion, the utility of NEPA is apparent in this case. Without NEPA, the FAA would not likely have imposed mitigation measures as conditions for the completion of the runway extension. With NEPA, however, the FAA was forced to consider the environmental consequences of its actions. As a result,

PDK will experience enhanced safety with insignificant environmental consequences due to the implementation of effective mitigation measures.

Accordingly, the petition for review is denied.

THE PETITION FOR REVIEW IS DENIED.