



DELTA MEC
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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May 21, 2014

Via Electronic Mail: Lisa.Favors@faa.gov

Atlanta Airports District Office
Attn: Lisa Favors
Env. Program Manager
1701 Columbia Ave., Suite 2-260
Atlanta, GA 30337-2747

Re: Notice of Intent to Prepare an Environmental Assessment for the Proposed Part 139 Operating Certificate and Related Actions at Paulding Northwest Atlanta Airport (Docket No. FAA-2013-0259-0415)

Dear Ms. Favors:

I am writing on behalf of the Delta Master Executive Council (“MEC”), the chapter of the Air Line Pilots Association, International (“ALPA”) representing over 11,600 Delta pilots currently flying for Delta Air Lines. We hereby submit the following comments in response to the Federal Aviation Administration (“FAA”) Notice of Intent (“NOI”) to Prepare an Environmental Assessment for the proposed certification of Paulding Northwest Atlanta Airport (“PUJ”) under 14 Code of Federal Regulations Part 139 and connected actions related to the introduction of scheduled commercial air carrier service at PUJ.¹ ALPA urges the FAA to carefully examine: (1) the purpose and need of commercializing PUJ; (2) the environmental implications (including increased aircraft noise) of building a second commercial airport near Atlanta; and (3) the airspace and efficiency implications of adding new commercial and business jet service to some of the nation’s busiest airspace surrounding the Hartsfield-Jackson Atlanta International Airport (“ATL”).

Purpose and Need

To date, no persuasive case has been made for building a commercial service airport at PUJ, as ATL should easily be able to accommodate new and forecasted demand for new entrants in the market. This is particularly true if the Federal and local investment at ATL remains strong, and is not diverted to more speculative investments at PUJ.

¹ 79 Fed. Reg. 22177-78 (April 21, 2014).

From ALPA’s perspective, PUJ works well as it was originally intended just a few short years ago: as a general aviation reliever airport.² We understand that since PUJ opened, ATL has seen a decrease in general aviation traffic, which frees ATL’s runways, taxiways, and controllers to safely and efficiently accommodate commercial flights, which are generally understood to represent the highest and best use of a scarce public asset like a commercial airport. PUJ is fulfilling its general aviation purpose in this regard, consistent with its intended use as reflected in the original environmental processing for the airport.

Considerable airline, local, and federal investments have already been made to accommodate forecasted demand at ATL, with improved air traffic management and facilities.³ It is unclear how commercial service would be managed at PUJ, but in the past year sequestration and funding cuts have resulted in the closure of contract air traffic control towers, and reduced funding for Air Traffic Management. We respectfully submit that scarce federal funds should be allocated to continuously transforming ATL with state-of-the-art air traffic control, safety, security, and other systems, befitting the world’s busiest airport, not diverting increasingly scarce Federal dollars into building a second commercial airport at PUJ, with unclear, undocumented feasibility and with no reasonable justification for doing so.

Environmental Impacts

While no apparent purpose or need for a new commercial airport has been demonstrated, it appears that Paulding County’s true intentions – which have been publicly minimized to date – are to build a robust, regional commercial hub. For example, the Airport Authority’s website asserts: “It is anticipated that economic development activity at the airport could result in more than \$350 million in annual economic activity and thousands of jobs for Paulding County over the next decade. . . .”⁴ Indeed, the NOI’s scope includes both lengthening and widening of the existing runway, which would support much larger commercial transport aircraft (*e.g.* Boeing 767 aircraft).⁵

Given the FAA or airport sponsor’s inability to cap commercial operations at PUJ once a Part 139 Operating Certificate is granted and Paulding County’s intentions, we believe the FAA should review operational activity and associated environmental impacts at and as a result of PUJ in an unconstrained manner, consistent with the rapid growth of commercial operations and other flights at similar airport projects. As part of this analysis, the FAA should examine the types of large commercial aircraft that could be accommodated at PUJ and associated impacts (such as noise), and not just the smaller aircraft disclosed to date by the project sponsor.

² When PUJ was constructed, the Airport Feasibility and Site Selection Study declared that the airport “would provide citizens of Paulding County with access to general aviation and vice versa.”

³ ALPA understands that ATL has substantial noise and other mitigation programs in place that may not be matched at PUJ.

⁴ <http://pauldingairport.com/sites/all/themes/haiku/documents/SilverCometFieldPressRelease.pdf>.

⁵ NOI at 22178. *See also* FAA Advisory Circular 150/5300-13A, Airport Design (Sept. 28, 2012) (establishing runway design criteria based on aircraft usage).

The FAA should carefully evaluate the significant construction-related and operational environmental impacts that would result from the proposed actions and associated infrastructure. In addition to adverse impacts discussed above, commercial service at PUJ would also result in significant air quality, traffic congestion, noise, parkland, and other environmental impacts, including on certain endangered species, which must be studied carefully.

Airspace & Efficiency Impacts

It appears that Paulding County's attempted transformation of a modest general aviation airport into an unnecessary second commercial airport has been done without any apparent analyses of operational and efficiency impacts. We believe this has the potential to create substantial conflicts with operations at ATL and other significant adverse environmental impacts, which must be studied thoroughly.

Although New York regional airspace is busier from an approach perspective, ATL is truly the busiest control tower in the world today.⁶ ALPA respectfully submits that initiation of commercial service at PUJ, some 35 miles from ATL – the world's busiest airport – raises potential airspace conflicts to approach and departure airspace, with potential adverse impacts to operational efficiency. Pilots and ATL's airlines benefit from improved airport efficiency, which may well be degraded at ATL if commercial service is initiated at PUJ.

For example, ALPA is aware of a recent study prepared in collaboration with the FAA, the City of Atlanta's Department of Aviation and the Atlanta Regional Commission, the Georgia Department of Transportation, and other aviation industry and regional organizations, which identified challenges PUJ would face as a supplemental commercial service airport. The report concluded that PUJ's "proximity to ATL airspace and its runway orientation make it particularly challenging."⁷ The report also concluded that "much more detailed analysis will be required" to make PUJ feasible from an airspace/air traffic perspective and that it is "not clear" that PUJ is "completely feasible." *Id.* ALPA respectfully requests that the FAA undertake the much more detailed analysis required as part of its environmental review.

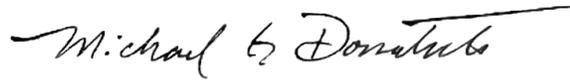
Changes to the airspace surrounding ATL, including the addition of commercial service from PUJ, has the potential to significantly and adversely impact operations at ATL. Interference with operations at ATL caused by dueling commercial airports within 35 miles of each other may create additional delays, especially during weather events. The need to coordinate use of this busy airspace with another close-in airport would increase the burden on what is already one of the nation's busiest radar approach facilities. We urge the FAA to carefully consider these implications in its environmental review of the proposed project.

⁶ FAA Administrator's Fact Book (June 2012) (ATL has the busiest air traffic control tower in the country and the fifth busiest radar approach facilities.)

⁷ *Atlanta Metropolitan Capacity Study Phase II, Executive Summary* (May 2011), p. 8, available at <http://www.atlanta-airport.com/docs/Airport/AMACSExecutiveSummary.pdf>.

In conclusion, ALPA submits that ATL is the reasonable and prudent alternative to the proposed commercialization of PUJ and urges the FAA to closely review the environmental, airspace, and efficiency implications of the proposed project. We appreciate the opportunity to participate in this important environmental review process to ensure that pilots' concerns are represented and analyzed.

Sincerely,

A handwritten signature in cursive script that reads "Michael G. Donatelli". The signature is written in black ink and is positioned above the typed name.

Captain Michael G. Donatelli
Chairman
Delta Master Executive Council
Air Line Pilots Association, Intl.