



ARLINGTON COUNTY, VIRGINIA
OFFICE OF THE COUNTY BOARD

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KENDRA JACOBS
CLERK TO THE
COUNTY BOARD

Nov. 4, 2019

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Hon. Stephen Dickson
Administrator
Federal Aviation Administration
800 Independence Ave, SW
Washington, DC 20591

Dear Administrator Dickson:

I write to express the Arlington County Board's strong opposition to the changes to flight procedures at Ronald Reagan Washington National Airport (DCA) being proposed by the FAA and the United States Secret Service (USSS) under the "Prohibited Area 56 (P-56) National Security Project" that the two agencies presented to the Metropolitan Washington Airports Authority (MWAA) DCA Community Working Group (CWG) on May 23, 2019. These flight procedures are being advanced with minimal community engagement, no environmental review, and no analysis of the impact on historic resources, in violation of long-standing federal policies, and procedures, and quite possibly in violation of federal law.

As noted in Congressman Beyer's letter of October 24, 2019, your staff stated during the May CWG presentation that the FAA was notified by USSS about restricted airspace incursions during DCA operations as a national security issue -- and was asked to act -- in August 2018. The FAA then privately invited commercial airlines in December 2018 to provide input on how to address the incursions.

Yet the CWG received just a few days' notice from MWAA staff that the FAA and USSS would present a proposed action to alter flight procedures at the May 23, 2019 CWG meeting. I would note that while the CWG meetings are open to the public, they are not widely publicized, and the interaction is limited to contact between CWG members or alternates and MWAA and FAA staff.

The CWG learned at the May 23, 2019 meeting that the plan was to move a waypoint on Runway 1 RNAV departures from over the Potomac River (ADAXE) into Virginia (REVGE). It was only at that meeting that the CWG was given an opportunity to respond, with a proposed implementation date of January 2020. We do not know of any subsequent community engagement, except for monthly reports by the FAA to the CWG and back-and-forth on CWG questions to the FAA.

In contrast, during the Environmental Assessment for the initial NextGen action in the DC Metroplex (airspace), the FAA held three separate three-hour community workshops (one in

MD, one in DC, one in VA) with display boards, actual data and analysis, and fully staffed by both the FAA and MCAA.

The timeline for the RNAV (GPS) procedure for Runway 19 arrivals was even more unreasonable: a public introduction on May 23, 2019 and proposed implementation on August 15, 2019, were it not for the intervention of the area congressional delegation.

More than three years after the County Board submitted comments in opposition to the deeply flawed LAZIR B north flow departure procedure at DCA (development of which the FAA had the good sense to discontinue in 2017), we are seeing the procedure rise again in the form of the RNAV (HOLTB) SID. This new proposed departure procedure for P-56 avoidance from Runway 1 includes the ADAXE to REVGE waypoint move directly over Rosslyn and concentrates more planes and more aircraft noise over Arlington residents and businesses. Unlike with the arrivals procedure, it is our understanding that FAA has not taken a pause for this departure procedure, and implementation is still planned for January 2020.

The County Board does not think a Categorical Exclusion (CE) is the appropriate method for moving forward with the proposed changes. Some form of environmental analysis and review, either an Environmental Assessment (EA), or an Environmental Impact Statement (EIS) is required before these proposed changes to flight paths can be implemented. There is also a requirement for Section 106 impact analysis on historic resources, as noted in the October 10, 2019 letter from the Virginia Department of Historic Resources (DHR) to Lisa Favors at the FAA.

In the FAA's May presentation to the CWG, there was only insufficient, cursory information provided detailing the incursions that prompted the "Prohibited Area 56 National Security Project" changes. The Board strongly supports the request made by Congressman Beyer in his letter of October 24 that the FAA provide more detailed information on P-56 incursions over the last eight years, so that we all may have a more data-driven understanding of Secret Service's security concerns that have led to these proposed changes in flight paths. I would add to Congressman Beyer's request that the data be broken out into separate totals for P-56A (area over the National Mall, White House, and Capitol) and P-56B (Naval Observatory)

The Board joins the regional Congressional delegation in urging the FAA to halt implementation of the proposed changes to DCA flight procedures (both approach and departure changes) until it can demonstrate a need for these changes, offer a full analysis of potential alternatives and address the concerns of the affected communities per the required environmental review process. We have heard from many residents who have asked that the Board do what it can to delay this decision and to prevail upon the FAA to undertake a fulsome environmental review, allow public comment and consider other flight path options to address the needs of the Secret Service's security concerns before instituting any change.

My colleagues, Vice Chair Libby Garvey and Board Member Matt de Ferranti, who are leading the Board's efforts on this issue, continue to explore various avenues to address community concerns. Arlington, along with our neighbors in Montgomery County, Maryland, will soon be

contracting with a private firm to conduct a joint aircraft noise and mitigation analysis study, and we urge the FAA to participate in the study as part of its community engagement at DCA.

The Board plans to hold another meeting to update our community on DCA flight path and noise issues before the end of the year. Once the date, time and location have been set for that meeting, we will post it on our [Aircraft Noise webpage](#) and advertise it widely. We will invite and encourage you to have FAA staff attend that meeting.

I look forward to working with you to address the pervasive airplane noise that is so adversely affecting our communities, in addition to other issues pertaining to Ronald Reagan Washington National Airport.

Sincerely,

A handwritten signature in black ink that reads "Christian Dorsey". The signature is written in a cursive style with a large, stylized initial "C".

Christian Dorsey, Chair
Arlington County Board