



**ARLINGTON COUNTY, VIRGINIA**  
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March 30, 2020

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

*Submitted via email to [9-ATO-DCA-HOLTB-SID-Comments@faa.gov](mailto:9-ATO-DCA-HOLTB-SID-Comments@faa.gov)*

Dear Administrator Dickson:

I write to reiterate the Arlington County Board’s strong opposition to the changes to the north-flow 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," and specifically to the HOLT B (RNAV) SID that was implemented on January 31, 2020. Until a more suitable north-flow departure flight procedure at DCA can be designed and tested that does not increase noise levels for thousands of residents and businesses or undermine the safety of the operating environment for flights, HOLT B should not be permanently implemented. Incursions that represent a tiny fraction of regular operations at the airport should not drive a change that is not necessary especially when it negatively impacts so many people. The ADAXE>REVGE waypoint shift should not occur, nor be expanded to the other 90 percent of north flow instrument departures not covered by HOLT B. The ADAXE waypoint should be restored while the FAA prepares an Environmental Impact Statement (EIS) that documents and mitigates the effects of the waypoint shift and subsequent flight paths for all nine north-flow SIDs, and properly examines less impactful alternatives to address the Secret Service’s concerns.

The Public Notice of Availability and Comment Period available in the Community Involvement section of the FAA’s website states that the HOLT B procedure and ADAXE>REVGE waypoint shift was done “...to move north-flow departing aircraft away from protected airspace above the National Mall and the White House (P-56), while still keeping aircraft over the Potomac River.” This statement is at best misleading. FAA’s own maps of radar tracks included with the same set of web materials clearly show that the REVGE waypoint is not over the Potomac River, but over developed land in Rosslyn. Both as a fly-by or fly-over waypoint, aircraft using HOLT B are no longer over the Potomac River, but instead are flying over populated areas where there are

significant noise impacts. Since the HOLT B temporary procedure was implemented, through March 24, 2020, Arlington County has logged over 230 noise complaints made by community residents. These complaints have also gone to either the FAA or the Metropolitan Washington Airports Authority (MWAA), or both. These complaints support the conclusion that aircraft are not keeping over the Potomac river, but are flying over people's homes and businesses, and increasing noise levels for our residents.

None of the materials provided on the web, including the noise screening report that was prepared to help justify the Categorical Exclusion (CE) for the HOLT B (RNAV) SID, provide any information about other flight procedures or other alternatives that were tested for P-56 avoidance, particularly any that truly kept aircraft over the Potomac River. Evidence of those tests and the justification for the HOLT B procedures must be documented under the law. Furthermore, the CE for HOLT B, which was approved via a regulatory provision because it is a temporary change to flight procedures for testing purposes, cannot and should not be used as justification to implement the ADAXE>REVGE waypoint shift for other north flow departure SIDs without a full NEPA analysis. Specifically, the information that was included in the noise screening report show results for a REVGE to BEBLE flight segment that bears little resemblance to what paths were actually being flown during the HOLT B testing period.

Observations from MWAA's WebTrak system clearly show multiple aircraft that, based on their destination, were assigned the HOLT B procedure and flew directly over North Arlington neighborhoods instead of over the Potomac River, the Georgetown Reservoir, or other unpopulated areas of the District of Columbia as shown in the tested and published REVGE to BEBLE segment. As with the REVGE waypoint itself, these direct flights over North Arlington that divert from the path to the BEBLE waypoint are bringing unwarranted and substantial noise impacts to our residents. Further, noise impacts will sharply increase if the rollout to the other 90 percent of flights covered by the other eight north flow departure SIDs is implemented. That increase is not captured in the noise screen or the current test period.

The County is disappointed in the lack of transparency in this process. The FAA's mission and stewardship of our nation's airspace must be considered instead of this solution looking for a problem. Starting with Secret Service's August 15, 2018 letter to the FAA requesting flight procedure changes to mitigate P-56 incursions and through the FAA's first public notification of these activities in the May 23, 2019 briefing to the MWAA DCA Community Working Group, both agencies have cited the increasing number of P-56 incursions in recent years as justification for shifting flight paths off the river to the west. Yet, no official record or documentation of these incursions has been provided to the CWG or to the public.

Even the unofficial numbers of annual P-56 incursions are not included with the Community Materials on the FAA's website. Based on the data presented at the May 23, 2019 CWG meeting, the thirty percent increase in annual P-56 incursions referenced by the Secret Service in their August 15, 2018 letter represents growth from 33 incursions in 2012 to 57 incursions during 2018. In comparison, in 2018 there were 293,827 aircraft operations at DCA, according to MWAA. The new flight procedures that increase noise for thousands of community members in Arlington and decrease safety by routing fully loaded aircraft over densely populated areas soon after takeoff, rather than over the Potomac River, are being pushed to mitigate incidents that

represent less than 0.02 percent of regular operations at DCA. To the best of our knowledge, the FAA has not documented any examination of alternative means to satisfy the Secret Service's concerns without unreasonably harming the residents of North Arlington. This alternatives analysis is fundamental to the process the FAA is obligated to undertake.

I also urge you to consider the impact of the COVID-19 pandemic on both the accuracy and validity of the test data and on the community's ability to comment on the HOLT B procedure. While flight activity for March at DCA has not yet been reported, early estimates suggest flights are significantly reduced due to COVID-19 effects regionally and nationally. People are flying less, and so the flight volumes and noise impacts during the later portion of the HOLT B test period are not representative of normal operations at DCA. In addition, our residents are totally focused on COVID-19 concerns with household isolation, physical distancing, and other public health protocols. It's unreasonable to expect them also to be filing noise complaints at this time.

During this time, the FAA should, at a minimum, temporarily suspend the review process and pause any further consideration of the ADAXE>REVGE waypoint shift and rollout to other north-flow SIDs until conditions at DCA stabilize. Upon return of normal conditions at DCA, the FAA should then resume the review process with fresh test data, and begin the full NEPA process for a permanent flight procedure change for north-flow departures, including new data collection and evaluation, and documented consideration of other flight path alternatives that meet the stated goal of eliminating P-56 incursions but also keep planes over the Potomac River or unpopulated or sparsely populated areas. The ADAXE waypoint should be restored while the FAA prepares the analysis that documents and mitigates the effects of the waypoint shift and subsequent flight paths for all nine north-flow SIDs.

As we work toward a solution consistent with the data that is safe, reasonable, and addresses the tiny number of incursions that are occurring, last week Arlington County executed a contract with a team of subject matter experts to assist us and Montgomery County, MD with noise mitigation strategies, including new flight procedures. We look forward to having our contractor engage with your staff at Potomac TRACON and other locations to discuss alternatives to the ADAXE>REVGE shift and new flight procedures to replace HOLT B and other north-flow departures. We are committed to a solution that protects our residents' quality of life, health, and safety, and meets the needs of the Secret Service.

Sincerely,



Libby Garvey, Chair  
Arlington County Board

cc: Arlington County Board Members  
Mark Schwartz, Arlington County Manager  
Stephen MacIsaac, Arlington County Attorney

