

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
EASTERN SERVICE AREA**

**CATEGORICAL EXCLUSION DECLARATION/RECORD OF
DECISION**

The Federal Aviation Administration (FAA) has determined that the following proposed airspace procedure changes associated with Ronald Reagan Washington National Airport (DCA) are categorically excluded from further environmental review under the National Environmental Policy Act (NEPA). To enhance national security, and in response to a request from the United States Secret Service (USSS), the proposed action amends eight existing north flow standard instrument departures (SIDs) by moving one waypoint approximately 784 feet to the southwest to direct aircraft further away from protected airspace above the White House and Naval Observatory. Additionally, in response to a request from the Reagan National Community Noise Working Group, the proposed action amends one waypoint on six existing SIDs, which will route aircraft closer to the Potomac River. Furthermore, the proposed action will establish the AMEEE1 SID to replace the HOLT B1 and BOOCK3, both of which will be canceled. The AMEEE procedure will use the new waypoint established for national security, and will otherwise not change from the procedures it is replacing. Finally, to integrate air traffic with the Northeast Corridor (NEC) and Atlantic Coast Routes (ACR) procedures, the action proposes to implement the SCOOB transition by extending the AMEEE (HOLT B/BOOCK replacement procedure) enroute transition beyond waypoint COLIN to SCOOB. This final action also requires amending the Baltimore Washington Airport (BWI) CONLE SID and Dulles Airport (IAD) JCOBY SID to establish the SCOOB Transition beyond COLIN waypoint. The SCOOB transition will be used for aircraft flying over 18,000 feet above ground level (AGL).

Proposed Actions

The FAA is approving the following proposed actions:

- 1) The following procedures would be amended to replace waypoint ADAXE with REVGE: HORTO4, CLTCH3, JDUBB4, SOOKI5, DOCTR5, REBLL5, WYNGS5, SCRAM6. Refer to **Figure 1**
- 2) In addition to action 1, the following procedures would also replace waypoint FERGE with RGIII: HORTO, WYNGS, REBLL, CLTCH, SCRAM, and JDUBB. Refer to **Figure 2**
- 3) HOLT B1, which was initially adopted for temporary use through July 31, 2020, will be adopted for continued use until it is replaced by AMEEE1, as described below.
- 4) The AMEEE1 procedure will be published and replace the HOLT B1 and BOOCK3, which will be canceled. Refer to **Figure 1**
- 5) To enhance safety and efficiency into the NEC and ACR, the BWI CONLE SID and IAD JCOBY SID will be amended to incorporate the SCOOB transition for aircraft over 18,000 feet AGL. Refer to **Figure 3**

Background

On August 15, 2018, the FAA received a letter from the Director of the United States Secret Service requesting that FAA identify and implement new procedures for aircraft at DCA that would reduce aircraft incursion into prohibited airspace, known as Prohibited Area P-56, above the White House and the Naval Observatory. The letter cited an increase in incursions into this airspace and explained that each incursion requires a coordinated response across multiple agencies, which expends valuable resources. The FAA and the USSS have previously discussed the Service's concerns over incursions, and this letter memorialized the Service's decision to request that FAA enhance national security by amending procedures in use at DCA.

On January 31, 2020, the FAA implemented a temporary air traffic procedure change at Ronald Reagan Washington National Airport (DCA) in response to the August 2018 request from the USSS. The request letter from the USSS can be reviewed in **Attachment A**. The temporary procedure, known as HOLT B, moved one waypoint 784 feet southwest 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. As recited in the request from the Secret Service, the purpose and need for the amended waypoint was to reduce aircraft incursions into the P-56 airspace. Incursions into P-56 airspace raise national security concerns because they require the Secret Service to expend resources to monitor the incursion and determine whether it poses a threat. By adjusting the waypoint to the southwest, it was expected that aircraft would begin turning away from the prohibited airspace sooner, thereby reducing incursions. The selected location of the adjusted waypoint was expected to address this need while also keeping aircraft over the river, which would be consistent with longstanding requests from the Metropolitan Washington Airports Authority to keep aircraft over the river. The temporary procedure was used to determine the effectiveness of the amended waypoint in reducing the number of incursions into P-56. The categorical exclusion for temporary implementation can be viewed in **Attachment B**. The FAA monitored the effectiveness of the temporary procedure by reviewing flight tracks of aircraft using the HOLT B procedure and comparing those tracks to the tracks of aircraft using the existing procedures. Based on that comparison, the FAA determined the amended waypoint was working as intended. In particular, aircraft were generally turning sooner away from P-56 while still staying within the range of flight tracks of aircraft flying the existing procedures. **See Figure 1**. As a result, the FAA expects that permanent adoption of the amended waypoint will reduce incursions while generally keeping aircraft over the Potomac River.

The FAA opened a comment period from February 27, 2020 to March 31, 2020 to allow the public the opportunity to comment on the temporary HOLT B waypoint change as well as the FAA's plan to permanently implement the amended waypoint for all north-flow departure procedures. The FAA received 503 comments, which can be reviewed in **Attachment C**. Based on the initial results of the temporary HOLT B procedure, which indicated aircraft were turning away from P-56 earlier and would thereby reduce incursions, the FAA proposed permanently implementing the amended waypoint for all north-flow departures at DCA. Refer to **Figure 1** to view flight tracks for the procedure changes involving the addition of REVGE. The permanent implementation would amend the following existing procedures: HORTO4, CLTCH3, JDUBB4, SOOKI5, DOCTR5, REBLL5, WYNGS5, and SCRAM6, and establish the AMEEE1 to replace the HOLT B1 and BOOCK3, both of which will be canceled. The FAA conducted a noise screen, which concluded no reportable or

significant noise increase would occur as a result of the proposed changes. Refer to **Attachment D** to review the noise screening report.

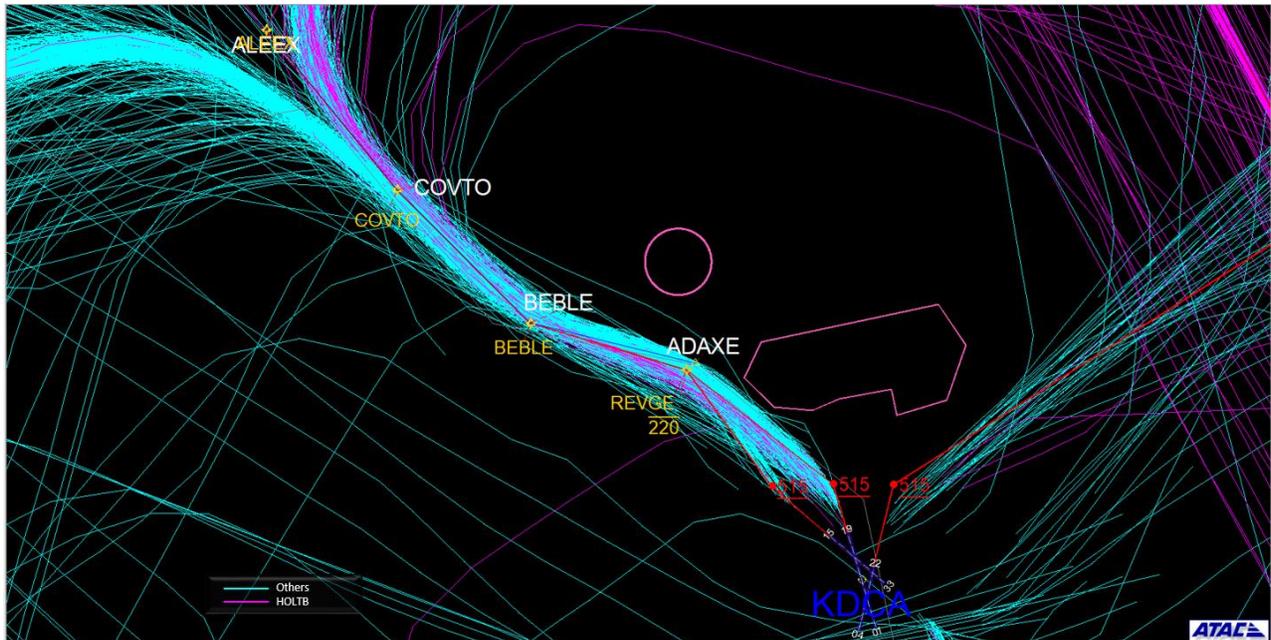


Figure 1: The no action alternative flight radar tracks (light blue) versus the proposed actions flight radar tracks (magenta) for the period January 30 - February 5, 2020.

Additionally, the FAA is proposing to remove waypoint FERGI and replace it with a new waypoint, RGIII, which will keep aircraft closer to the Potomac River. The change was requested (following a unanimous vote) by the DCA Community Noise Working Group, a group comprised of representatives from surrounding communities that is focused on noise-related concerns from aircraft operating at DCA. The FAA opened a comment period from May 15, 2020 to June 15, 2020 to allow the public the opportunity to comment on the FERGI waypoint removal; establishment of the AIMEE SID; cancellation of HOLTB and BOOCK SIDs; and, establishment of the the high altitude SCOOB transition. The FAA received three comments which can be reviewed in **Attachment C**. Refer to **Figure 2** to view flight tracks for the removal of waypoint FERGI and the addition of RGIII.

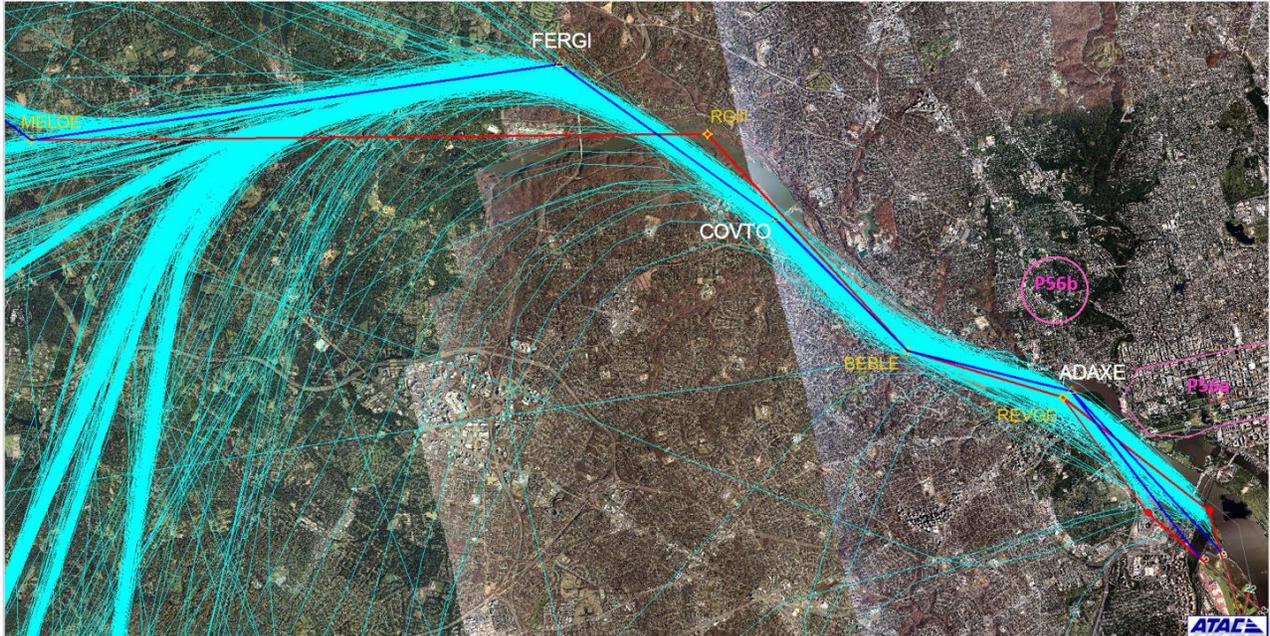


Figure 2: Flight tracks (blue lines) using FERGI waypoint. The dark blue line is the existing route using the FERGI waypoint. The red line is the proposed route removing FERGI and adding RQIII waypoint. Flight tracks were recorded in August 2019.

The BWI CONLE and IAD JCOBY SIDs are being amended to establish the SCOOB transition, as proposed for the new AMEEE1, which will be used above 18,000 feet AGL and is not expected to change the existing flight corridor. Refer to **Figure 3** to view the proposed SCOOB transition.

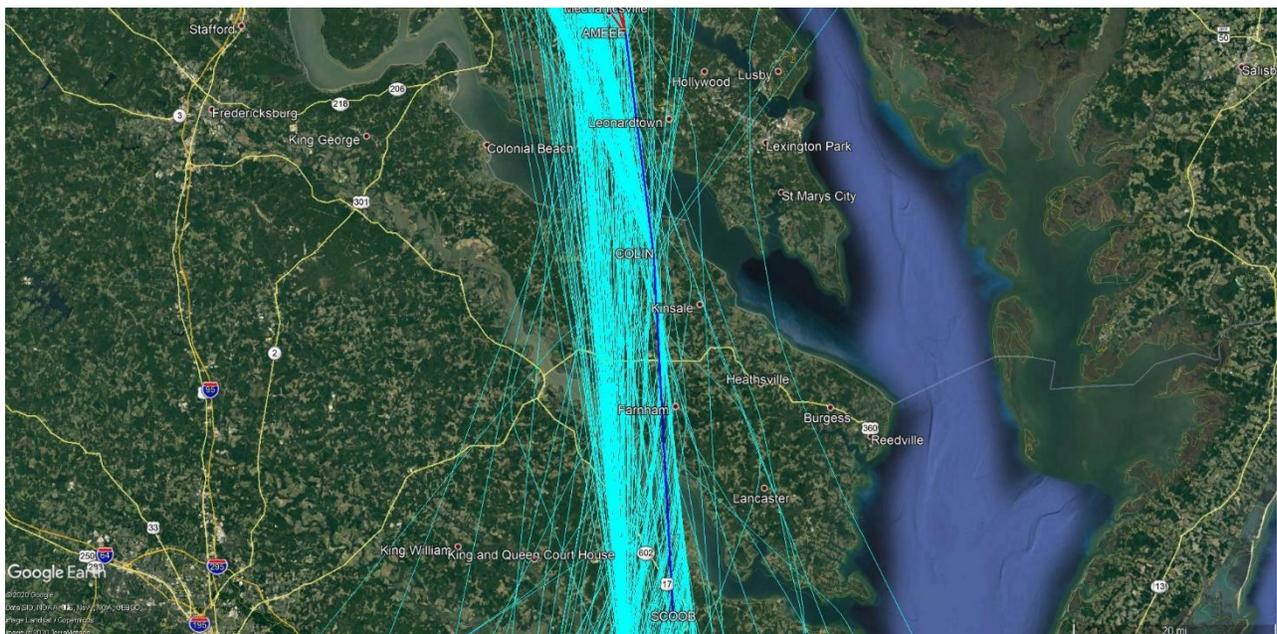


Figure 3: Flight tracks (light blue lines) near the proposed SCOOB transition (blue line). Flight tracks were recorded in August 2019.

Purpose and Need

The need for this project is to enhance national security by reducing incursions into P-56 airspace. The shift from waypoint ADAXE to REVGE is expected to reduce incursions by causing aircraft to turn away from P-56 sooner to fly-by waypoint REVGE, which will be located 784 feet southwest. This action was requested by the U.S. Secret Service, which asked the FAA Administrator to formulate a solution to protect the P-56 airspace. This proposed change will affect multiple north-flow aircraft departure procedures, which would replace waypoint ADAXE with REVGE.

The removal of waypoint FERGI and incorporation of a new waypoint, RGIII, will increase efficiency by shortening the north flow departures by 0.2 nautical miles and implement procedure changes requested by the Reagan National Community Noise Working Group. The need for this project was identified by the Reagan National Community Noise Working Group, which voted unanimously to request that the FAA implement the change.

The AMEEE1 will be published and replace the HOLT B1 and BOOCK3, both of which will be canceled. The HOLT B was only a test procedure, and the BOOCK3 name caused pilot confusion with the pronunciation.

The FAA proposes to implement the SCOOB transition by extending the AMEEE (HOLT B/BOOCK replacement procedure) enroute transition beyond waypoint COLIN to SCOOB. This action also requires amending the Baltimore Washington Airport (BWI) CONLE SID and Dulles Airport (IAD) JCOBY SID, which share the same track. The SCOOB transition will be used for aircraft flying over 18,000 AGL. Refer to **Figures 1, 2, and 3** to view the proposed route changes and existing flight tracks for aircraft that will use the proposed procedures.

Air Quality

Due to the minor change in aircraft location, the FAA determined that any air quality impacts would be de minimis. As described in FAA Order 1050.1F, the significance threshold for air quality is as follows: As described in FAA Order 1050.1F, Exhibit 4-1, an emissions impact is significant if “the action would cause pollutant concentrations to exceed one or more of the NAAQS, as established by the EPA under the Clean Air Act, for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations.”

Section 176(c) (commonly referred to as the General Conformity Rule) of the Clean Air Act (CAA) requires that federal actions conform to the appropriate State Implementation Plan (SIP) to attain the air quality goals identified in the CAA. A conformity determination is not required if the emissions caused by a federal action would be less than the de minimis levels established in regulations issued by EPA. FAA Order 1050.1F provides that further analysis for National Environmental Policy Act (NEPA) purposes is normally not required where emissions do not exceed the EPA’s de minimis thresholds. In addition, the EPA regulations allow federal agencies to identify specific actions as “presumed to conform” (PTC) to the applicable SIP.

The EPA regulations identify certain actions that are presumed to conform with an applicable State Implementation Plan because the actions were found by EPA to not exceed these de minimis thresholds, including air traffic control activities and adoption of approach, departure, and en route

procedures for aircraft operations above the inversion base for pollutant containment, (commonly referred to as the “mixing height”) specified in the applicable SIP (or 3,000 feet Above Ground Level (AGL) in places without an established mixing height). The General Conformity Rule also contains a provision that allows agencies to develop a list of actions presumed to conform, which would be exempt from the requirements of the rule. One of the actions published by the FAA is “air traffic control activities for air operations that occur at altitudes below the atmospheric mixing height, provided that modifications to routes and procedures are designed to enhance operational efficiency (i.e., to reduce delay), increase fuel efficiency, or reduce community noise impacts by means of engine thrust reductions.” The proposed actions are above the 3,000 foot AGL mixing height or are operationally more efficient. Furthermore, the proposed actions will not increase the number of operations or change the aircraft fleet mix.

Noise

To determine whether aircraft noise impacts are significant under NEPA, the FAA considers whether predicted increase in noise associated with the proposed actions exceed defined thresholds of significance. For aircraft noise, that threshold is an increase of 1.5 dB or more for a noise-sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, when compared to the No Action Alternative for the same timeframe.

The FAA Order 1050.1F notes that special consideration needs to be given to the evaluation of the significance of noise impacts on certain noise-sensitive areas (including, but not limited to, noise-sensitive areas within national parks; national wildlife and waterfowl refuges; and, historic sites, including traditional cultural properties) where the land use compatibility guidelines in 14 CFR Part 150 may not be sufficient to determine the noise impact.

To identify the potential for impacts on noise levels of noise-sensitive areas, the FAA conducts an initial noise analysis using a “screening tool.” Screening tools use simplified but conservative modeling assumptions to provide estimates of where noise increases may occur. The noise screening identifies areas that may be exposed to significant noise impacts (i.e., an increase of DNL 1.5 dB or more in an area that is exposed to noise at or above the DNL 65 dB noise exposure level). The noise screening tool also identifies certain areas with potential increases in areas exposed to lower levels of noise, specifically:

- For DNL 60 dB to less than 65 dB: ± 3 dB
- For DNL 45 dB to less than 60 dB: ± 5 dB

The FAA refers to any change in noise exposure levels meeting these criteria as “reportable.” Although they do not exceed the threshold of significance for most land uses, for certain land uses where the Part 150 land use guidelines may not be sufficient to account for the noise impact, they are factors to consider whether there are extraordinary circumstances rendering a categorical exclusion inapplicable.

The noise screening analysis titled, “Noise Screening Analysis Report For Ronald Reagan Washington National Airport KDCA, Washington, DC, dated April 7, 2020”, indicates that the proposed actions would not result in a reportable or significant noise impact. The methodology for the noise screening analysis is described in Attachment D. The screening analysis report considered

all procedure changes that included the substitution of the ADAXE waypoint with REVGE and the substitution of the FERGI waypoint with RGIII. The screening model was based on pre-COVID-19 operational levels, which are expected to eventually return. The results of aircraft flying the HOLT procedure are consistent with how aircraft were modeled in noise screening analysis.

Section 106 of the National Historic Preservation Act

The FAA considered the potential for these proposed actions to cause adverse effects to historic resources. The FAA made a proposed finding and received concurrence that the proposed airspace changes related to the adoption of waypoint REVGE would not affect (or, in the case of the District of Columbia, adversely affect) historic properties. In addition, the FAA proposed a finding and received concurrence that the adoption of the RGIII waypoint, publishing the AMEEE1 procedure to replace the HOLT1 and BOOCK3, and adding the SCOOB transition would not adversely affect historic resources.

The FAA made its consultation letters and proposed findings available to the public for review on its website. As explained in the letters, the FAA reached its findings based on the following considerations: the noise screen determined the proposed actions will not cause reportable or significant noise increases; most of the proposed actions will not introduce any audible or visual effects to the area of potential effect (APE). The exception is the adoption of the RGIII waypoint, however, there was only one historic resource identified within the APE for that action, and Maryland concurred that the resource would not be adversely affected.

The FAA first contacted the State Historic Preservation Office (SHPO) or equivalent in the District of Columbia, Virginia, and Maryland and requested a review and concurrence with FAA's determinations with regard to the REVGE waypoint. The State of Maryland and Virginia agreed with the FAA that no historic properties would be affected by the amended REVGE waypoint. The District of Columbia expressed disagreement with the FAA's approach to defining the Area of Potential Effects with respect to the REVGE waypoint. Nevertheless, the District of Columbia opined that, even if the FAA had followed its preferred approach for determining the Area of Potential Effect, the District believed there would be no adverse effect to historic resources within its jurisdiction. This opinion satisfied the larger purpose of the Section 106 process, which is to identify adverse effects to historic properties and avoid, minimize, or mitigate those adverse effects.

The FAA also consulted with the State of Maryland and Virginia with respect to the RGIII waypoint. The Area of Potential Effects for that undertaking extended into both states. Maryland concurred with the FAA's finding of no adverse effects for that undertaking, while Virginia agreed there would be no historic properties affected at all. Additionally, the Fairfax County Department of Planning and Development, Planning Division, and Montgomery County Parks, Agricultural History Farm Park Division, were asked to review and comment on the FAA's findings of affect for resources within their jurisdiction of the Area of Potential Effects.. Montgomery County acknowledged receipt of the FAA's consultation letter but did not respond. Fairfax County responded to the FAA's consultation letter and offered comments that were considered by the FAA. First, the County expressed concern about a resource, the Colvin Run Mill, which is approximately 16 miles from DCA and located outside of the Area of Potential Effects that was developed in consultation with the State of Virginia. Notably, the Colvin Run Mill will not experience a reportable or significant increase in noise, nor will there be an introduction of aircraft overflights. Furthermore, the Colvin

Run Mill is recognized as a historic resource in the areas of engineering and agriculture, and there is no mention of a quiet setting being one of the characteristics that qualified it for inclusion on the National Register of Historic Places. Therefore, even if the undertaking were to cause negative audible or visual effects to the mill (which the FAA does not expect to occur) those effects would not be considered adverse under Section 106 of the National Historic Preservation Act. The County also offered comments on alternative approaches for developing the Area of Potential Effects and accompanying data for future projects. The FAA will consider these comments during future consultation with the County. Refer to **Attachment E** to review copies of the Section 106 agency responses.

Cumulative Impacts

The FAA is proposing the implementation of aircraft route waypoint changes and high altitude transitions for airspace changes in the vicinity of Metropolitan DC. These actions are intended to enhance national security, increase efficiency, and implement changes endorsed by the DCA Community Noise Working Group. The FAA is not aware of additional ongoing or proposed airspace actions in the Metropolitan DC area that would cause cumulative impacts. Notably, these actions will not cause an increase in aircraft operations, change the time of operations, or alter the fleet mix. In addition, past actions such as the procedures approved in 2013 as part of the D.C. Optimization of Airspace and Procedures in the Metroplex were subject to their own environmental review and were found not to cause any reportable or significant impacts to areas surrounding DCA. By definition, categorically excluded actions do not normally have the potential for individual or significant impacts on the human environment.

Extraordinary Circumstances

Extraordinary circumstances are factors or circumstances in which a normally categorically excluded action may have a significant environmental impact that then requires further analysis in an EA or EIS. As described in FAA Order 1050.1F § 5-2, for FAA proposed actions, extraordinary circumstances exist when the proposed actions meet both of the following criteria: 1) the proposed actions involve any of the circumstances described in FAA Order 1050.1F § 5-2(b); and 2) may have a significant impact.

The FAA considered the presence of extraordinary circumstances and determined none were present, and therefore a higher level of environmental review was not warranted. For example, as noted above, the FAA's noise screen revealed that the proposed actions would not result in any reportable or significant noise increases, which also supported the FAA's determination that there would be no significant impacts to resources protected by Section 4(f) of the U.S. Department of Transportation Act or the National Historic Preservation Act. Furthermore, while there was some public opposition to the proposed replacement of ADAXE with REVGE, the FAA does not believe there was a substantial dispute over the degree, extent, or nature of the proposed actions environmental impacts. Mere opposition is not sufficient for a proposed action or its impacts to be considered highly controversial on environmental grounds. Even if the impacts were considered by some to be highly controversial, there is no evidence that these changes might have a significant impact.

Public Involvement

The FAA provided the public with an opportunity to review and comment on its proposed actions and the environmental review process. The FAA also consulted with the Historic Preservation Officers for the District of Columbia, the State of Maryland, the State of Virginia, Fairfax County, VA and Montgomery County, MD. Information about the FAA's proposed actions were made available on the FAA's website, https://www.faa.gov/air_traffic/community_involvement/dca_p56/, including the results of the FAA's noise screen and the results of the FAA's Section 106 consultation process. In addition, the FAA provided multiple briefings to the Reagan National Community Noise Working Group. Throughout the public comment periods, the FAA received over 500 comments. All of those comments were considered by the FAA before it decided to approve the actions herein. The comments submitted to the FAA, as well as the FAA's responses, are included in **Attachment C**.

Declaration of Exclusion

The FAA has reviewed the above referenced proposed actions, and it has been determined, by the undersigned, to be categorically excluded from further environmental analysis and documentation according to FAA Order 1050.1F, Environmental Impacts: Policies and Procedures. The implementation of this action will not result in any extraordinary circumstances in accordance with FAA Order 1050.1F.

Basis for this Determination

An Environmental Review was conducted by the Eastern Service Center Operations Support Group. The Environmental Review was conducted in accordance with policies and procedures in FAA JO 7400.2L, "Procedures for Handling Airspace Matters," Department of Transportation Order 5610.1C, "Procedures for Considering Environmental Impacts" and FAA Order 1050.1F

The proposed actions meet the following categorical exclusion contained in FAA Order 1050.1F: §5-6.5(i): Establishment of new or revised air traffic control procedures conducted at 3,000 feet or more above ground level (AGL); procedures conducted below 3,000 feet AGL that do not cause traffic to be routinely routed over noise sensitive areas; modifications to currently approved procedures conducted below 3,000 feet AGL that do not significantly increase noise over noise sensitive areas; and, increases in minimum altitudes and landing minima.

Decision

After careful and thorough consideration of the facts contained herein, the undersigned find that the proposed actions are consistent with existing national environmental policies and objectives as set forth in Section 101(A) of the National Environmental Policy Act and other applicable environmental requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of the National Environmental Policy Act.

The undersigned has reviewed the referenced Environmental Review, including the evaluation of the purpose and need that this action would serve. The proposed actions described in the Environmental Review are found to be reasonably supported and a Categorical Exclusion/Record of Decision is appropriate.

Under the authority delegated by the Administrator of the FAA, it is directed that action be taken to carry out the following proposed actions: As described above, amend airspace procedures HORTO4, CLTCH3, JDUBB4, SOOKI5, DOCTR5, REBLL5, WYNGS5, SCRAM6. Publish the AMEEE1 to replace the HOLTB1 and BOOCK3, both of which will be canceled. The BWI CONLE4 and IAD JCOBY4 will be amended to coincide with the SCOOB Transition established by the new AMEEE1. The SCOOB high altitude transition to the northeast corridor will be published for safety and efficiency.

Concurrence by:

Andy Pieroni

Date: July 30, 2020

Andy Pieroni, Environmental Protection Specialist, Eastern Service Center, Operations Support Group

Approved by:

Charles J Gibson

Date: July 31, 2020

FOR Ryan Almasy, Group Manager, Eastern Service Center, Operations Support Group

Right of Appeal

This decision is taken pursuant to 49 U.S.C. §§ 40101 et seq., and constitutes a final order of the Administrator that is subject to review by the United States Circuit Court of Appeals in accordance with the provisions of 49 U.S.C. § 46110. Any party seeking to stay the implementation of this Categorical Exclusion/ROD must file an application with the FAA prior to seeking judicial relief in the form of a stay, as provided in Rule 18(a), Federal Rules of Appellate Procedure.

ATTACHMENTS

ATTACHMENT A: The United States Secret Service Request Letter

ATTACHMENT B: Categorical Exclusion for Temporary Implementation of HOLT B

ATTACHMENT C: Public Comments Matrix

ATTACHMENT D: Noise Screening Results

ATTACHMENT E: Section 106 Agency Response Letters

ATTACHMENT A: The United States Secret Service Request Letter



U.S. Department of Homeland Security
UNITED STATES SECRET SERVICE

Washington, D.C. 20223

August 15, 2018

Mr. Daniel K. Elwell
Acting Administrator
U.S. Department of Transportation
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Dear Mr. Elwell:

I am writing you to discuss flight incursions into the Prohibited Area P-56, District of Columbia. The proximity of Ronald Reagan Washington National Airport (KDCA) to the White House and Naval Observatory, creates a significant security risk for the U.S. Secret Service (Secret Service). Pursuant to Title 18, Section 3056, of the United States Code, the Secret Service is responsible for implementing appropriate security procedures for the President, Vice President, and visiting heads of state. In accordance with these responsibilities, the Secret Service must ensure the security of the airspace above the White House and the Naval Observatory, both of which fall within the Prohibited Area P-56. Over the past few years the Secret Service has observed an increase in flight violations into the Prohibited Area P-56 from aircraft departing and arriving KDCA, resulting in an annual incursion increase of approximately thirty percent. The increased numbers of aircraft violating the Prohibited Area P-56 has caused great concern for the Secret Service.

Pursuant to 14 CFR Part 73 [Airspace Docket No. 98-AWA-4] Change of Using Agency for Prohibited Area P-56, from the Administrator of the Federal Aviation Administration to the Secret Service, I would respectfully request that the Federal Aviation Administration identify and implement new procedures for aircraft operating out of KDCA. The objective of the Secret Service, regarding this request, is to reduce and ultimately eliminate aircraft violations of the Prohibited Area P-56. Each incursion provokes a significant coordinated response from the Department of Defense and numerous federal agencies, including the Secret Service, causing the expenditure of valuable resources while also affecting commercial and other air traffic in the National Capital Region. Additionally, this request will reduce the exposure to potential liability which commercial airlines, air charter companies, and individual pilots face for each incursion.

Thank you for any assistance you can provide with this request. Should you wish to discuss this matter further, please do not hesitate to contact Deputy Assistant Director, Special Operations, James Lewis on 202-406-5452.

Sincerely,

A handwritten signature in blue ink that reads "R D Alles".

Randolph D. "Tex" Alles

ATTACHMENT B: Categorical Exclusion for Temporary Implementation of HOLT B

**DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION CATEGORICAL EXCLUSION
DECLARATION**

Description of Federal Action: The Federal Aviation Administration (FAA) will conduct an air traffic test to move waypoint ADAXE, 784 feet southwest, and establish a new waypoint REVGE as part of the publication of a new departure procedure called HOLT B. The HOLT B departure procedure supports safe and efficient airspace usage for departing aircraft north from Reagan International Airport (DCA). The proposed action was developed because of a longstanding concern caused by airlines penetrating the Prohibited Area P-56 that protects a portion of Washington, D.C. and the White House. Due to these incursions, the U.S. Secret Service requested that the FAA Administrator identify and implement changes for aircraft operating out of DCA to eliminate aircraft violations of the Prohibited Area P-56. **Attachment A** contains the letter from The U.S. Secret Service that requests FAA's assistance. FAA used Aviation Environmental Design Tool (AEDT) software to conduct a noise screening study for the proposed action, which showed no reportable or significant noise increases would be introduced. **Attachment B** contains the noise screening report for the proposed action. The noise screening report assumed that 100% of north-flow departures would utilize the new waypoint REVGE, which was an extremely conservative assumption for this proposed action, which is only expected to be used by 10% of departures. The FAA plans to publish the HOLT B procedure on January 30, 2020 and evaluate the effectiveness of the amendment. **Attachment C** contains a depiction of the proposed amended procedure. If FAA deems the amended HOLT B meets the purpose and need of reducing incursions into P-56, the FAA will propose the permanent implementation of the HOLT B as well as an amendment to the remaining existing north-flow departure procedures at DCA so that all aircraft follow the new REVGE waypoint. Any such proposal would be subject to a separate environmental review process under NEPA and any other applicable environmental laws or requirements. The current proposed action has independent utility because it is solely intended to determine the safety and effectiveness of the incorporation of REVGE. Once that determination has been made, the FAA will consider the environmental effects of permanently using the REVGE waypoint for all of its north-flow departures.

Basis for this Determination: An environmental review and noise screening study was conducted to ensure that the Federal action is in compliance with the National Environmental Policy Act (NEPA) and its implementing regulations. This review was conducted in accordance with policies and procedures in Department of Transportation Order 5610.1C, "Procedures for Considering Environmental Impacts" and FAA Order 1050.1F.

Declaration of Exclusion: The FAA has reviewed the above referenced Federal action and it has been determined, by the undersigned, to be categorically excluded from further environmental documentation according to FAA Order 1050.1F. The implementation of this action will not result in any extraordinary circumstances in accordance with FAA Order 1050.1F, Paragraph 5-2.

The applicable categorical exclusion is: FAA Order 1050.1F, Paragraph 5-6.5 (n): "Tests of air traffic departure or arrival procedures conducted under 3,000 feet above ground level (AGL), provided that: (1) the duration of the test does not exceed six months; (2) the test is requested by an airport or launch operator in response to mitigating noise concerns, or initiated by the FAA for safety or efficiency of proposed procedures; and (3) the test data collected will be used to assess the operational and noise impacts of the test."

Consideration of Extraordinary Circumstances: Based on the FAA's noise screening study that indicated no reportable noise increases would occur as a result of our proposed action, the FAA considered the extraordinary circumstances set forth in FAA Order 1050.1F § 5-2(b) and determined none of them to be present.

Section 106 of the National Historic Preservation Act: The FAA has also considered the potential for this action to cause adverse effects to historic resources. The FAA determined this is not the type of activity that

has the potential to cause effect on historic properties, assuming such historic properties were present, and therefore the FAA has no further obligations under Section 106. 36 C.F.R. § 800.3(a). The FAA reached this conclusion based on a number of considerations, including the following: the limited duration of the proposed action; the proposed action is only expected to be used by approximately 10% of departures; the noise screen determined the proposed action will not cause any reportable or significant noise increases; the proposed action will not introduce any audible or visual effects to the area; according to MWAAs Noise Exposure Map, the area of change already falls within the 45 DNL contour (at a minimum) and therefore any resources recognized for their quiet attributes would not be affected by this action.

Concurrence by:

Andrew Pieroni Date: November 25, 2019

Andy Pieroni, Environmental Protection Specialist, Eastern Service Center, Operations Support Group

Approved by:

 Date: 11/25/19
Ryan Almasy, Group Manager, Eastern Service Center, Operations Support Group

ATTACHMENT A – Secret Service Request Letter



DIRECTOR

U.S. Department of Homeland Security
UNITED STATES SECRET SERVICE

Washington, D.C. 20223

August 15, 2018

Mr. Daniel K. Elwell
Acting Administrator
U.S. Department of Transportation
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Dear Mr. Elwell:

I am writing you to discuss flight incursions into the Prohibited Area P-56, District of Columbia. The proximity of Ronald Reagan Washington National Airport (KDCA) to the White House and Naval Observatory, creates a significant security risk for the U.S. Secret Service (Secret Service). Pursuant to Title 18, Section 3056, of the United States Code, the Secret Service is responsible for implementing appropriate security procedures for the President, Vice President, and visiting heads of state. In accordance with these responsibilities, the Secret Service must ensure the security of the airspace above the White House and the Naval Observatory, both of which fall within the Prohibited Area P-56. Over the past few years the Secret Service has observed an increase in flight violations into the Prohibited Area P-56 from aircraft departing and arriving KDCA, resulting in an annual incursion increase of approximately thirty percent. The increased numbers of aircraft violating the Prohibited Area P-56 has caused great concern for the Secret Service.

Pursuant to 14 CFR Part 73 [Airspace Docket No. 98-AWA-4] Change of Using Agency for Prohibited Area P-56, from the Administrator of the Federal Aviation Administration to the Secret Service, I would respectfully request that the Federal Aviation Administration identify and implement new procedures for aircraft operating out of KDCA. The objective of the Secret Service, regarding this request, is to reduce and ultimately eliminate aircraft violations of the Prohibited Area P-56. Each incursion provokes a significant coordinated response from the Department of Defense and numerous federal agencies, including the Secret Service, causing the expenditure of valuable resources while also affecting commercial and other air traffic in the National Capital Region. Additionally, this request will reduce the exposure to potential liability which commercial airlines, air charter companies, and individual pilots face for each incursion.

Thank you for any assistance you can provide with this request. Should you wish to discuss this matter further, please do not hesitate to contact Deputy Assistant Director, Special Operations, James Lewis on 202-406-5452.

Sincerely,

A handwritten signature in blue ink, appearing to read "R.D. Alles".

Randolph D. "Tex" Alles

ATTACHMENT B – Noise Screening Results

Noise Screening Analysis Report

For

Ronald Reagan Washington National Airport

KDCA

Washington, DC

Prepared by:

ATO, AJV-114, Environmental Policy Team

Thursday, November 21, 2019

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Summary

Noise analysis was completed to assess potential impacts resulting from proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC, using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Historical radar track data was used to create a baseline scenario. After the baseline scenario was built, aircraft operations assigned to the proposed procedure were modeled as flying the proposed procedure, which provides the alternative scenario. Selections for track assignments were made based on historical flight paths, and RNAV capable aircraft were assigned to the procedure nearest to their historical tracks in the alternative scenario.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. In the case of DCA, there was no significant or reportable increase in noise resulting from the proposed action.

DRAFT

Purpose

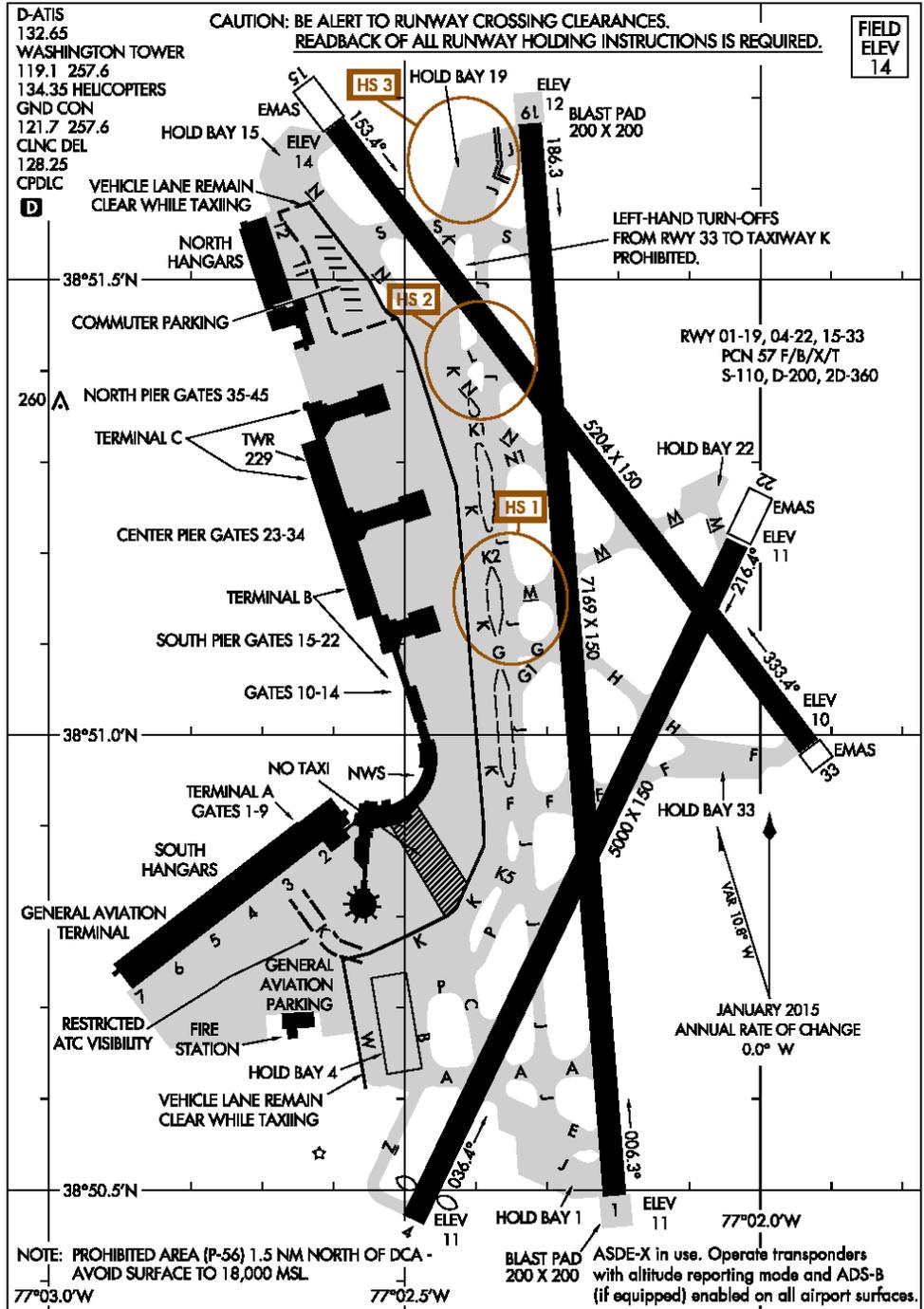
The purpose of this report is to document the process used to analyze the noise impact of proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC and to present the results of that analysis. The analysis of the instrument flight procedures at DCA was performed using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Figure 1 shows the airport diagram for DCA, which provides the runway layout and the airport's field elevation. Table 1 shows the procedure name, type and publication date. Figures depicting the procedure changes are shown in Appendix A.

Table 1: Proposed Procedures Modeled for DCA

Procedure Name	Procedure Type
CLTCH TWO	RNAV SID
HORTO THREE	RNAV SID
JDUBB TWO	RNAV SID
REBLL FOUR	RNAV SID
SCRAM FOUR	RNAV SID
WYNGS FOUR	RNAV SID

19283 **AIRPORT DIAGRAM** RONALD REAGAN WASHINGTON NATIONAL (DCA)
 AL-443 (FAA) WASHINGTON, D.C.



AIRPORT DIAGRAM WASHINGTON, D.C.
 19283 RONALD REAGAN WASHINGTON NATIONAL (DCA)

Figure 1: Airport Diagram of DCA

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Methods

Noise screening was completed using the TARGETS Environmental Plug-in tool to calculate Day-Night Average Sound Levels (DNL) from existing operations (baseline) and modeled operations to replicate the proposed action (alternative). Historical radar track data for DCA was obtained from the Performance Data Analysis and Reporting System (PDARS). After concurrence of the dates to be used by the environmental specialist and air traffic facility, 60 days of random radar track data were selected for the DCA analysis representing a range of temperature and wind conditions as well as being representative of the average runway usage. A list of the tracks selected for analysis are shown in Appendix B.

After the removal of overflights, incomplete track segments, and other unusable tracks, 24,743 tracks were used for the analysis. The altitude of the historical tracks was considered and a range ring was set to contain the area where most of the tracks reached above 10,000 feet Above Field Elevation (AFE). This established the study area and the tracks outside of the study area were removed from the analysis. In the case of DCA, the study area is a circle with a radius of 40 nautical miles (nm) centered over the airport.

The randomly selected dates are presumed to represent average traffic counts and traffic flows through various seasons and peak travel times for DCA. There were no significant runway outages or significant conditions that would otherwise result in abnormal traffic counts or traffic flows. In order to calculate the Average Annual Day (AAD) impacts, traffic counts for average daily departures and arrivals used for annualization in this analysis were obtained through the FAA's AFS Data Analytics Runway Usage Module.

Historical radar track data was used to create a baseline noise exposure, which provides lateral path definition, aircraft fleet mix, departure/arrival stream proportions for each runway, and day/night traffic ratios. The alternative scenario was built by taking aircraft operations and assigning them to the proposed procedure instead of their historical tracks. RNAV capable aircraft were assigned to the procedure based on their historical tracks, proximity to other procedures, and any additional usage information from the Environmental Specialist. In the case of DCA, all operations departing from runways 01 and 03 were assigned to a proposed procedure.

The analysis does not take into account terrain. All calculations were made in reference to the airport's field elevation. The altitude controls were based on AEDT standard aircraft profiles. With respect to lateral distribution, a 0.5 nm dispersion for RNAV procedures was used and a 0.3 nm dispersion for RNP procedures was used based standard methods for noise screening. For tracks near the runway where dispersion is normally less than 0.3 nm, dispersion was based on historical track data.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. The Environmental Plug-in Tool uses the Aviation Environmental Design Tool to calculate noise. The noise output files from AEDT for both the baseline and alternative noise exposures consist of a series of equally spaced grid points, each showing the DNL value. The noise grid (receptor set) is a square grid extending 30 nm in each direction of the airport with grid points (receptors) spaced 0.25 nm apart. The noise results of the baseline and alternative scenarios were then compared to test for potential noise impacts.

The noise impact is a comparison between the baseline and the alternative noise exposure that depicts reportable and significant noise changes at all affected locations per the criteria indicated in FAA Order 1050.1F and Chapter 32 of FAA Order 7400.2K. The reportable and significant noise increases and decreases (if any) are then depicted on an aerial map.

Results

1. Noise Exposure

The baseline and alternative noise exposure is shown in Figure 3-1 and Figure 3-2, which depicts the levels and locations of the noise produced by the historical radar track data for arrivals and departures.

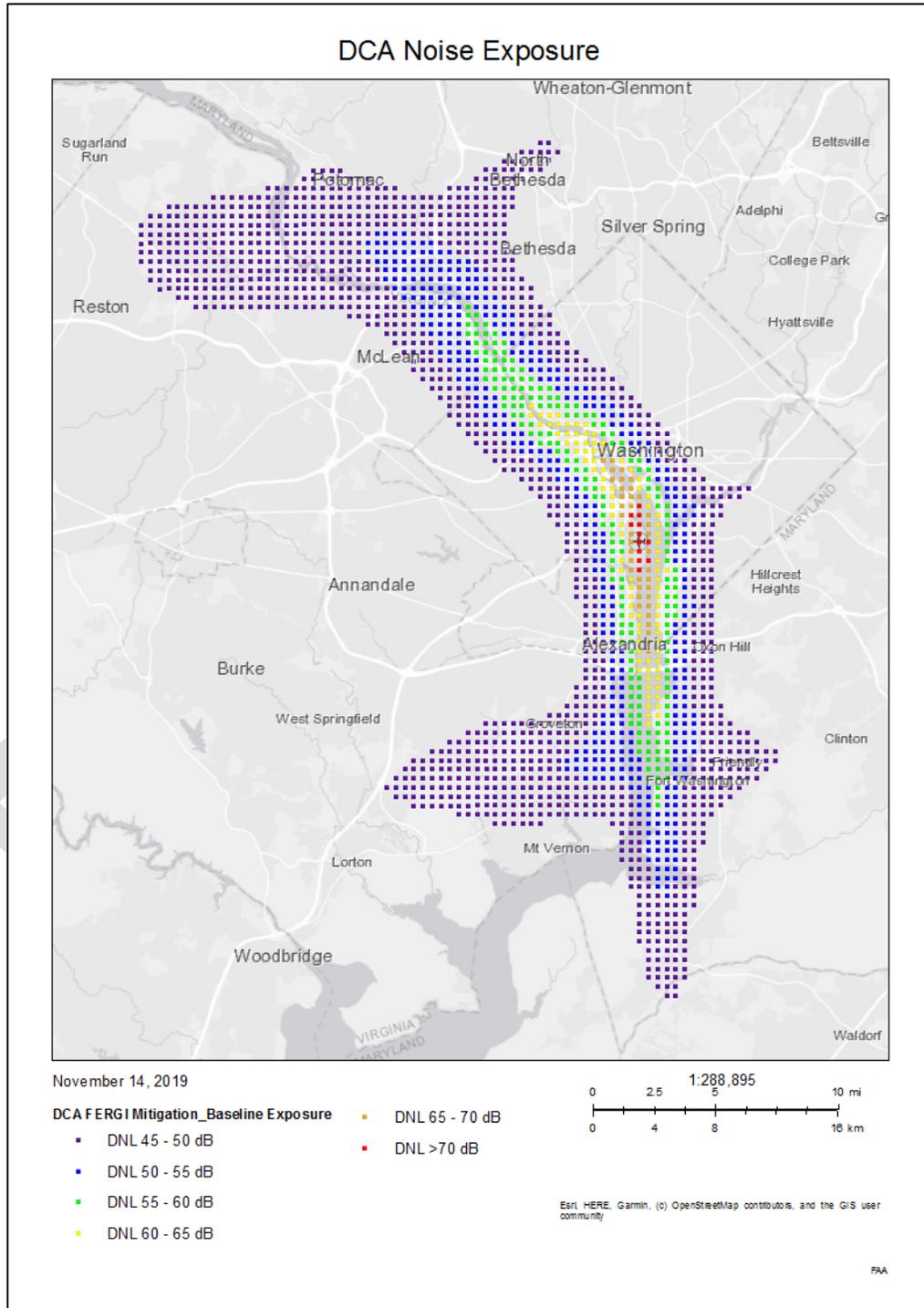


Figure 3-1: Baseline Noise Exposure in TARGETS

DCA Noise Screening Analysis Report *For Official Internal Use Only*

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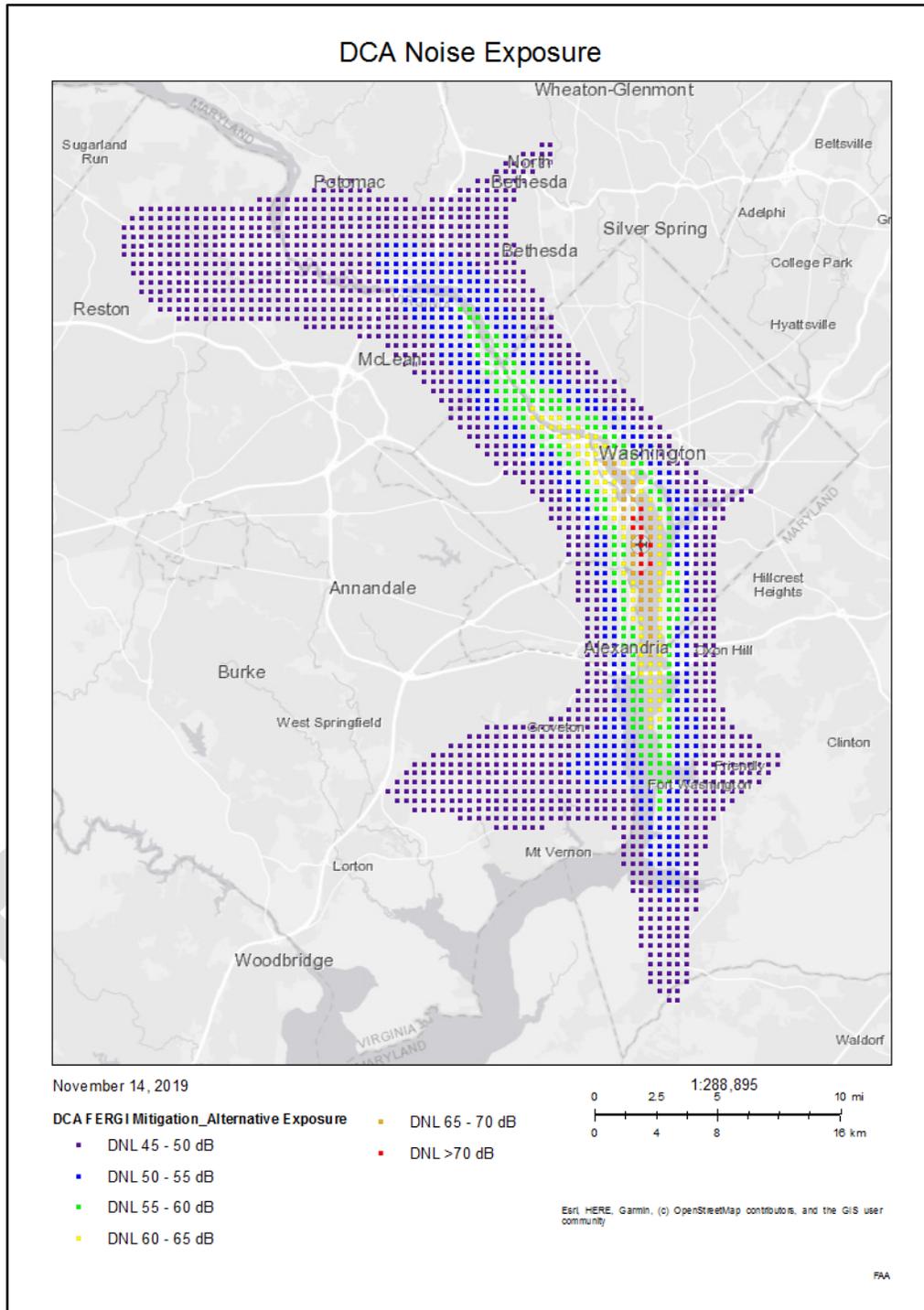


Figure 3-2: Alternative Noise Exposure for the Proposed Procedures in TARGETS

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2. Noise Impacts

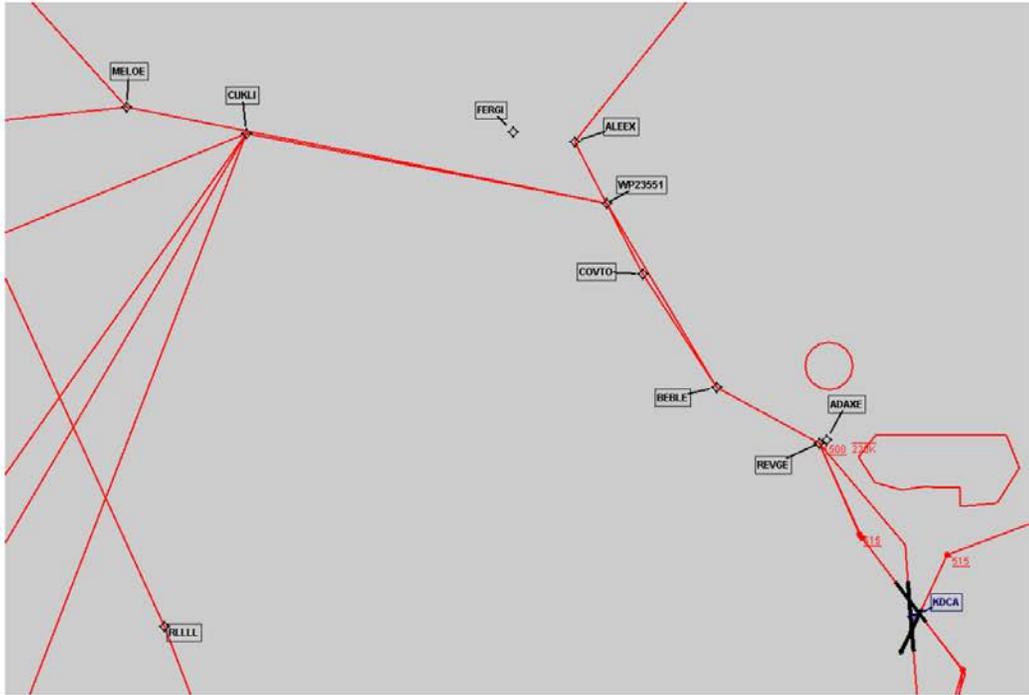
A comparison of the baseline and alternative scenarios by the TARGETS Environmental plug-in determines the noise impacts of the proposed action. Significance of noise impacts is defined by FAA Order 1050.1F¹ which establishes the threshold for significant increases in noise exposure. Where the proposed action results in a noise impact, TARGETS graphically displays a noise impact layer that indicates the locations of reportable and significant changes. When applicable, these impacts are shown overlaying a map view of the area surrounding the airport. In the case of DCA, there was **no significant increase in noise resulting from the proposed action.**

DRAFT

¹ According to Exhibit 4-1 of FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, a noise impact is significant if “*The action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.*”

Appendix A Proposed Changes to DCA SIDS

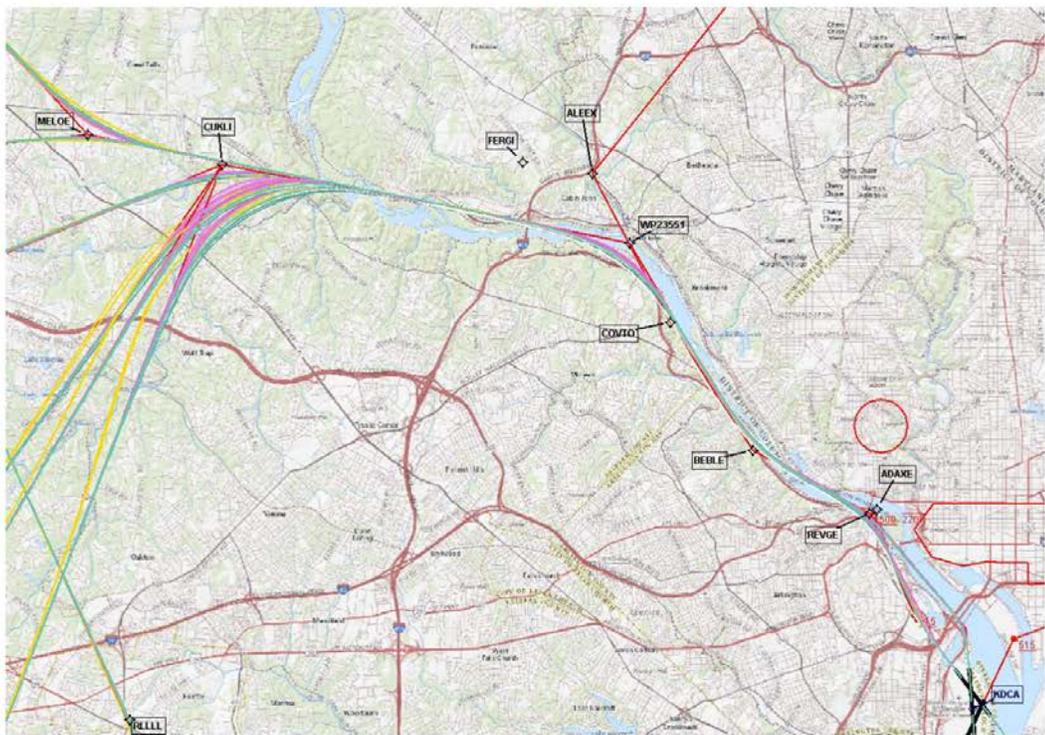
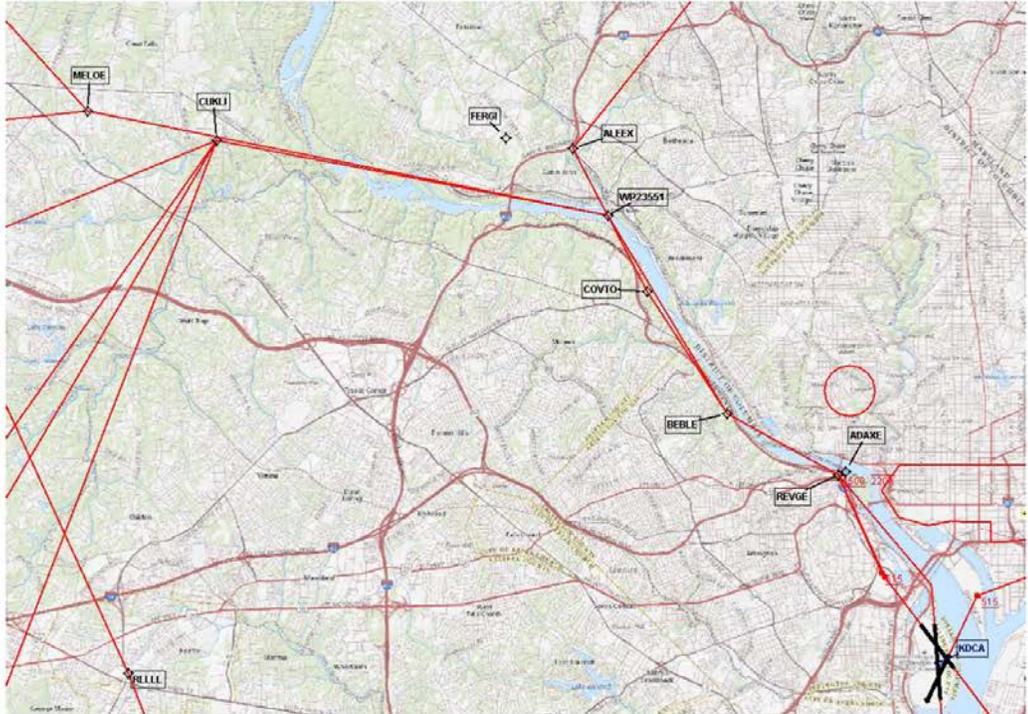
DCA SIDS - ALTERNATIVE ROUTE FROM BEBLE TO CUKLI/MELOE



DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

DCA SIDS - ALTERNATIVE ROUTE FROM BEBLE TO CUKLI/MELOE



DCA Noise Screening Analysis Report *For Official Internal Use Only*

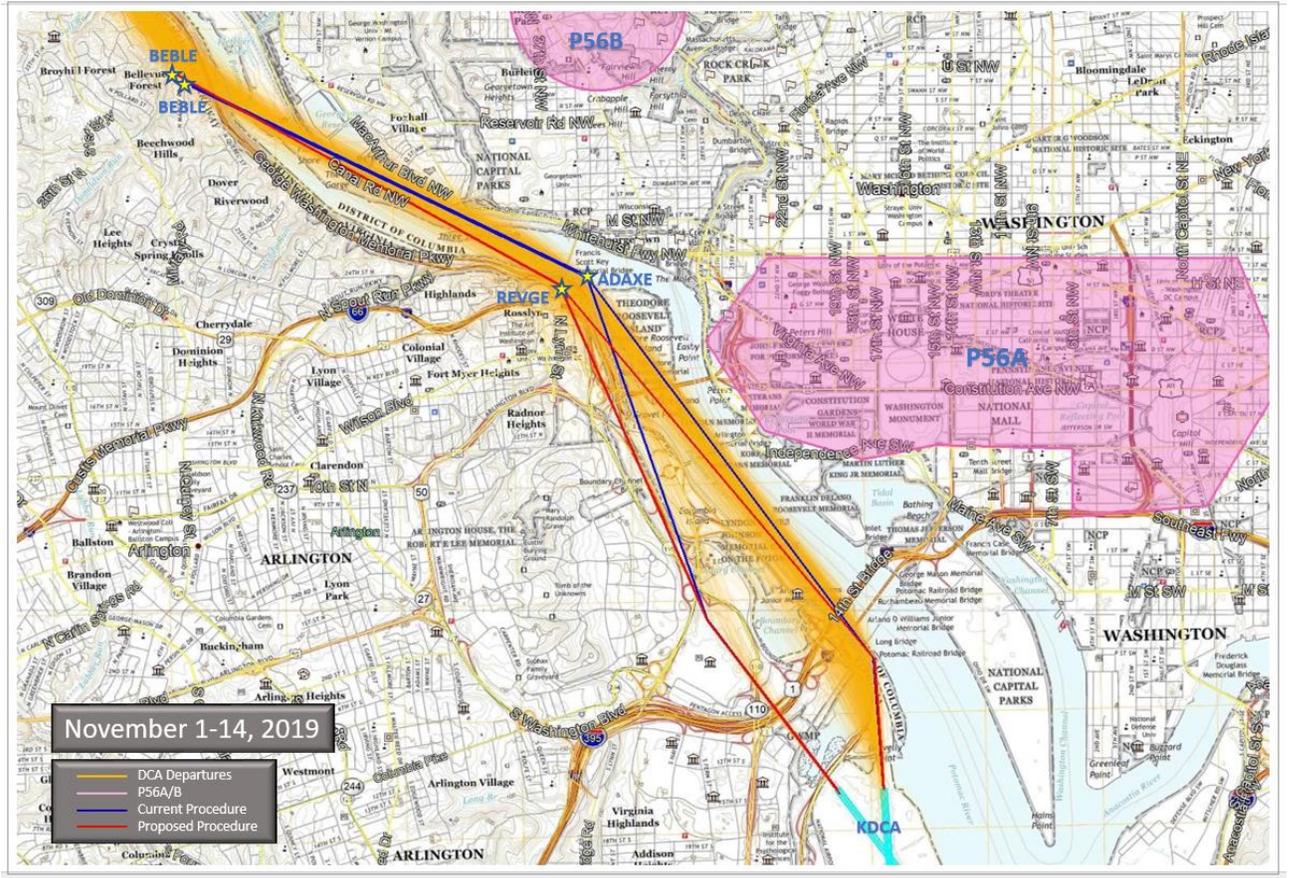
This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Appendix B Random Tracks Used for Analysis

1	7/9/2018
2	7/21/2018
3	7/23/2018
4	7/24/2018
5	7/26/2018
6	8/1/2018
7	8/5/2018
8	8/18/2018
9	8/20/2018
10	8/27/2018
11	8/29/2018
12	8/30/2018
13	9/1/2018
14	9/9/2018
15	9/11/2018
16	9/19/2018
17	10/8/2018
18	10/9/2018
19	10/14/2018
20	10/16/2018
21	10/17/2018
22	10/19/2018
23	10/21/2018
24	10/31/2018
25	11/7/2018
26	11/12/2018
27	12/1/2018
28	12/4/2018
29	12/7/2018
30	12/11/2018

31	12/12/2018
32	12/13/2018
33	12/18/2018
34	12/23/2018
35	12/27/2018
36	12/31/2018
37	1/3/2019
38	1/28/2019
39	1/30/2019
40	2/4/2019
41	2/5/2019
42	2/6/2019
43	2/8/2019
44	2/15/2019
45	2/18/2019
46	2/25/2019
47	3/9/2019
48	3/12/2019
49	3/20/2019
50	3/26/2019
51	3/27/2019
52	3/28/2019
53	4/25/2019
54	4/26/2019
55	4/27/2019
56	5/1/2019
57	5/3/2019
58	5/6/2019
59	5/23/2019
60	5/28/2019

ATTACHMENT C – Amended HOLT/B Procedure Depiction



ATTACHMENT C: Public Comments Matrix

General Comment Category Definitions and Topical Responses for Comment Categories

1.0 Public Involvement

On February 27, 2020, the FAA established a comment mailbox and solicited feedback from the public regarding the temporary implementation of HOLT B and the other proposed changes at DCA under consideration by the FAA. Notice of the comment period was provided on the FAA's website, FAA's social media, and to the Reagan National Community Noise Working Group (DCA Working Group). The FAA held two comment periods. The FAA opened the first comment period from February 27 to March 31, 2020 to allow the public the opportunity to comment on the temporary HOLT B procedure as well as the FAA's tentative plan to permanently implement the amended waypoint for all north-flow departure procedures. The FAA received 503 comments during this comment period. The FAA opened a second comment period from May 15 to June 15, 2020 to allow the public the opportunity to comment on the FERGI waypoint removal and publication of the high altitude SCOOB transition. The FAA received three comments during the second comment period. All comments received during the public comment period have been considered and responses to the comments are provided below. The FAA recognizes the importance and value of public input. The public involvement process for the proposed changes goes well beyond what is required by FAA Order 1050.1F and CEQ's NEPA regulations for when an agency approves an action that fits with a categorical exclusion.

2.0 Comment Category General Definitions and Topical Responses

The FAA has recognized that in the comments submitted, multiple commenters raised many of the same issues. The FAA prepared topical responses for these recurring comments. The FAA reviewed each comment individually and determined which responses were appropriate for each comment. To respond to the comments, eleven topical responses were prepared that provide a single comprehensive response to the issues of concern. Below are the general definitions and topical responses used to categorize the comments.

2.0.1 Air Quality Topical Response

Due to the minor change in aircraft location under the proposed actions, the FAA determined that any air quality impacts would be *de minimis*. Under FAA Order 1050.1F, a significant air quality impact would only be identified if an action would result in the exceedance of one or more of the National Ambient Air Quality Standards (NAAQS), established by the Environmental Protection Agency (EPA), for any time period analyzed. According to FAA Order 1050.1F, Exhibit 4-1, an emissions impact is significant if "[t]he action would cause pollutant concentrations to exceed one or more of the NAAQS, as established by the EPA under the Clean Air Act, for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations."

Section 176(c) (commonly referred to as the General Conformity Rule), of the Clean Air Act (CAA) requires that federal actions conform to the appropriate State Implementation Plan (SIP), which in turn are established to attain the air quality goals identified in the CAA. A conformity determination is not required if the emissions caused by a federal action would be less than the *de minimis* levels established in regulations issued by EPA. FAA Order

1050.1F provides that further analysis for National Environmental Policy Act (NEPA) purposes is not required where emissions do not exceed the EPA's *de minimis* thresholds. The EPA's regulations identify certain actions that would not exceed these thresholds, including air traffic control activities and adoption of approach, departure, and enroute procedures for aircraft operations above the inversion base for pollutant containment, (commonly referred to as the "mixing height") specified in the applicable SIP (or 3,000 feet Above Ground Level (AGL) in places without an established mixing height). In addition, the EPA regulations allow federal agencies to identify specific actions as "presumed to conform" (PTC) to the applicable SIP.

In a notice published in the Federal Register, the FAA identified several actions that "will not exceed the applicable *de minimis* emissions levels" and, therefore, are presumed to conform, including air traffic control activities and adoption of approach, departure, and enroute procedures for air operations.¹ The FAA's PTC notice explains that aircraft emissions above the mixing height do not have an effect on pollution concentrations at ground level. The notice also specifically notes that changes in air traffic procedures above 1,500 feet AGL and below the mixing height "would have little if any effect on emissions and ground concentrations."²

FAA determined that project-related aircraft emissions released into the atmosphere below the "mixing height," (generally 3,000 feet above ground level) can be presumed to conform when modifications to routes and procedures are designed to enhance operational efficiency (i.e., to reduce delay), increase fuel efficiency, or reduce community noise impacts by means of engine thrust reductions.³ All of the proposed changes except the adoption of the REVGE waypoint will occur above 3,000 feet. Although the new REVGE waypoint will be used by aircraft below 3,000 feet, the new waypoint (REVGE) slightly reduces the distance aircraft travel on their initial departure and, therefore, increases fuel efficiency. Additionally, the proposed actions will not change the number or types of aircraft utilizing the airspace. Also, aircraft are expected to use the same departure gradient, and therefore aircraft are not expected to spend additional time below the mixing height. For these reasons, the proposed actions are covered by the Presumed to Conform notice. As noted, the other proposed actions will all occur above 3,000 feet. Because the actions are presumed to conform under the General Conformity Rule, no further analysis is required under NEPA or the Clean Air Act and there is no potential for the actions to cause a significant impact to air quality.

2.0.2 GHG Emissions Topical Response

Greenhouse gases (GHG) are naturally occurring and man-made gases that trap heat in the earth's atmosphere. The potential effects of proposed GHG emissions are by nature global and are caused by cumulative impacts. An appreciable impact on global climate change would only occur when proposed GHG emissions combine with GHG emissions from other human-made activities on a global scale. According to the EPA, the General Accounting Office (GAO) in 2009 reported that domestic aviation contributed

¹ Federal Presumed to Conform Actions under General Conformity, 72 Fed. Reg. 41565 (July 30, 2007).

² *Id.*

³ 72 Fed. Reg. 41578.

approximately three percent of total national carbon dioxide (CO₂) emissions. Similarly, in its 2010 Environmental Report, the International Civil Aviation Organization (ICAO) estimated that aviation accounted for approximately three percent of all global CO₂ emissions resulting from human activity.

As explained in FAA Order 1050.1F, the FAA has not established a significance threshold for Climate. FAA's 1050.1F Desk Reference recognizes the complexity created by the global nature of climate change, but it still notes that assessing increases of GHGs can provide useful information.

The proposed actions are not likely to have an appreciable effect on climate change. Under the proposed actions, departing aircraft will reach the RNAV "engagement point" at approximately the same distance and altitude as aircraft flying today. Of particular importance, the proposed actions will not result in an increase in operations nor in an increase in the number of miles traveled. Therefore, cumulative impacts to global climate change from implementation of the proposed actions would be less than significant.

2.0.3 Noise Topical Response

To determine whether aircraft noise impacts are significant under NEPA, as set forth in FAA Order 1050.1F, the FAA considers whether predicted increases in noise associated with the proposed actions exceed defined thresholds of significance. For aircraft noise, that threshold is an increase of DNL dB or more for a noise-sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the No Action Alternative for the same timeframe.

The FAA Order 1050.1F notes that special consideration needs to be given to the evaluation of the significance of noise impacts on certain noise-sensitive areas (including, but not limited to, noise-sensitive areas within national parks; national wildlife and waterfowl refuges; and historic sites, including traditional cultural properties) where the land use compatibility guidelines in 14 CFR Part 150 may not be sufficient to determine the noise impact.

To identify the potential for impacts on noise levels of noise-sensitive areas, the FAA conducts an initial noise analysis using a "screening tool". Screening tools use simplified but conservative modeling assumptions to provide estimates of where noise increases may occur. The noise screening identifies areas that may be exposed to significant noise impacts (i.e., an increase of DNL 1.5 dB or more in an area that is exposed to noise at or above the DNL 65 dB noise exposure level). In addition, the noise-screening tool also identifies certain areas with potential increases in areas exposed to lower levels of noise, specifically:

- For DNL 60 dB to less than 65 dB: ± 3 dB
- For DNL 45 dB to less than 60 dB: ± 5 dB

The FAA refers to any change in noise exposure levels meeting these criteria as

“reportable.” Although they do not exceed the threshold of significance for most land uses, for certain land uses where the Part 150 land-use guidelines may not be sufficient to account for the noise impact, they are factors to consider in whether there are extraordinary circumstances rendering a categorical exclusion inapplicable.

The noise screening analysis titled, “Noise Screening Analysis Report For Ronald Reagan Washington National Airport KDC, Washington, DC, dated April 7, 2020” indicates that the proposed actions would not result in any reportable or significant noise impacts. The screening analysis report considered all procedure changes that included the substitution of the ADAXE waypoint with REVGE and the substitution of the FERGI waypoint with FERGI. The methodology used in the noise screen is described in the FAA’s Noise Screening Report. Notably, the FAA used pre-COVID-19 operational levels to assess the impacts of the proposed actions. In addition, because the FAA had published HOLT as a temporary procedure before pursuing the permanent adoption of the REVGE waypoint, the FAA had the opportunity to compare how aircraft actually fly the waypoint to how aircraft were projected to fly during the model. After reviewing the radar tracks of aircraft flying the HOLT procedure, the FAA was able to verify the AEDT Noise Screen used reasonable assumptions in its model for where aircraft would fly.

2.0.4 Section 106 Topical Response

Section 106 of the National Historic Preservation Act requires the FAA to consider the effects of its undertakings on properties listed or eligible for listing in the National Register of Historic Places (National Register). For undertakings that are determined to cause an adverse effect, FAA is required to develop and evaluate alternatives to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. As part of the identification of historic properties, assessment of effects, and resolution of adverse effects, federal agencies are required to consult with State or Tribal Historic Preservation Officers. If an undertaking is expected to cause effects, agencies must also consult with local governments with jurisdiction over the resources.

The majority of adverse effects cited under the Section 106 implementing regulations relate to physical effects, such as destruction, alteration, or removal of a historic resource caused by land acquisition, construction, or other ground disturbance activities. None of those effects will be caused by the undertakings because there will be no physical effects. However, the regulations also recognize that an adverse effect can be caused by “introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features.” 36 CFR § 800.5(a)(2)(v). Therefore, the FAA’s assessment under Section 106 focused on whether there was the potential for adverse effects caused by the introduction of air traffic or the introduction of reportable or significant noise impacts to historic and cultural resources that may result from changes in air traffic routes.

The FAA contacted the Historic Preservation Office in the District of Columbia and the State Historic Preservation Office (SHPO) in Virginia and Maryland and requested a review and concurrence with FAA’s determinations about the undertakings’ Area of

Potential Effects and the effects of the undertakings. The District of Columbia disagreed with the FAA's approach to defining the Area of Potential Effects, but nevertheless offered its concurrence with the FAA's larger finding that the undertaking would not cause any adverse effects to historic resources within the District's jurisdiction. The State of Maryland and the State of Virginia both concurred with all of the FAA's findings with respect to the undertakings, concluding that the undertakings would either have no adverse effects or no effects at all. As explained in the Record of Decision, Fairfax County expressed concerns about potential impacts to the Colvin Run Mill, an historic resource outside of the APE that the FAA determined in consultation with the State of Virginia. The FAA considered these concerns but ultimately concluded it did not warrant a change to the FAA's findings because the resources would not be subject to any reportable or significant noise increases, nor would there be an introduction of aircraft overflying the resources. Moreover, the characteristics of the resource that qualified it for inclusion on the National Register of Historic Places do not include a quiet setting. Refer to **Attachment E** to review copies of the Section 106 agency responses.

To assess the potential effects of the proposed actions, the FAA considered the Area of Potential Effects (APE) for the undertakings. The APE is defined as "the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The [APE] is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." 36 CFR § 800.16(d).

Here, the undertakings would not cause any physical effects. However, pursuant to 36 CFR § 800.5(a)(2)(v), the FAA also considered the potential for the undertaking to introduce visual, atmospheric or audible elements that could diminish the integrity of a historic property's significant historic features. The FAA completed this assessment by comparing the baseline flight tracks to the flight tracks expected for the proposed actions. The FAA also considered the potential for the undertakings to have noise effects that could alter the character or use of historic properties. Specifically, the FAA completed a noise screen to identify any areas that would be exposed to a reportable or significant noise changes as defined by FAA Order 1050.1F.

The noise screen concluded that the undertaking would not cause any reportable or significant noise impacts. However, the elimination of the FERGI waypoint was determined to introduce aircraft to a new area (the other actions were determined not to introduce aircraft to a new area). As a result, the FAA proposed an APE for the area between the waypoints BEBLE-FERGI-MELOE and waypoints BEBLE-RGIII-MELOE based on the potential introduction of visual, atmospheric, or audible elements. The FAA conducted a review of the National Historic Register of Historic Places to identify resources within the APE. Based on that review, only the Taylor, David W., Model Basin was contained in the APE. Based on the features of that historic resource, the FAA did not believe there would be an adverse impact to the Basin because the listing criteria of architecture and engineering would not be diminished by the introduction of air traffic. Furthermore, the area was not expected to be exposed to a reportable or significant noise screen. The FAA proposed a finding of no adverse effect to the Maryland State Historic Preservation Office and received

concurrence. Montgomery County, MD was also provided an opportunity review the FAA's proposed finding and the County did not object. The State of Virginia also concurred that there would be no historic properties affected within its jurisdiction.

2.0.5 Community Engagement Topical Response

Some commenters suggested the FAA should perform additional community outreach before implementing the proposed actions. The FAA's proposed actions to reduce incursions into P-56 came directly from The United States Secret Service as a matter of national security. The FAA takes this concern seriously and sought to act swiftly while still keeping the public apprised of its proposed course of action. Nevertheless, the FAA and the Secret Service provided a joint briefing to the DCA Working Group on May 23, 2019, informing them of the historical concerns over incursions, the recent increase in incursions, and the FAA's plan to develop an amended waypoint. Following the presentation, minutes from that meeting and the FAA's presentation were available on the Working Group's webpage.

The removal of waypoint FERGI and addition of RGIII was a unanimous request from the DCA Working Group to address concerns. The FAA continues to engage with the DCA Working Group in a non-voting technical advisory capacity, and has committed to consider recommendations that are consistent with FAA procedure criteria. The FAA held two comment periods from February 27-March 31, 2020 and May 15 –June 15, 2020 to collect comments regarding the proposed actions. The FAA publicized a webpage containing pertinent project information for public review and the comment mailbox, using social media, local media outlets, and the DCA Working group meetings to notify the public about the opportunity to provide comments. The FAA received 506 comments, which are contained in the comment matrix in **Attachment C**, and which demonstrate the community was aware of the FAA's proposed actions. Furthermore, because the FAA implemented the temporary HOLT procedure prior to these actions, the public had the benefit of reviewing and commenting on the radar tracks depicting where aircraft would actually fly if the REVGE waypoint was permanently adopted. All of these measures reflect a level of community engagement that exceeds the public involvement requirements as part of the environmental review for a categorical exclusion.

2.0.6 Past Project Comments

A number of commenters suggested that FAA should prepare an environmental review to consider the impacts of past procedural changes. However, past procedural changes were already subjected to an environmental review before they were implemented. For example, the Performance-Based Navigation procedures adopted as part of the D.C. Optimization of Airspace and Procedures in the Metroplex were reviewed in an Environmental Assessment (EA). A draft of that EA was issued for public review and comment before the FAA issued a Final EA as well as a Finding of No Significant Impact/Record of Decision in December 2013.

This environmental review is limited to the future proposed actions discussed in the categorical exclusion. By definition, categorical exclusions are limited to actions that do not normally have the potential for individual or cumulative significant impacts.

Nevertheless, the categorical exclusion for the proposed actions considered whether there would be any significant cumulative impacts and determined there would be none.

2.0.7 Level of NEPA (Environmental) Review Topical Response

A number of commenters suggested the proposed actions should have been reviewed in an Environmental Assessment or an Environmental Impact Statement. The National Environmental Policy Act instructs that Environmental Impact Statements must be prepared for major federal actions that will cause significant impacts to the environment. An Environmental Assessment is a type of NEPA review that can be used to assess whether a proposed action will cause significant impacts. However, the White House Council on Environmental Quality's implementing regulations permit agencies to identify categories of actions, which do not individually or cumulatively have a significant effect on the human environment. *See* 40 CFR § 1508.4. The FAA has identified numerous categories of actions that meet this definition, and have disclosed them in FAA Order 1050.1F. A categorical exclusion is not applicable if extraordinary circumstances indicate a normally excluded action may have a significant environmental effect.

The FAA determined that the proposed actions fit within a previously adopted categorical exclusion set forth in FAA Order 1050.1F: §5-6.5(i). As part of its review, the FAA also considered whether any extraordinary circumstances were present and would therefore require further analysis in an EA or EIS. *See* FAA Order 1050.1F § 5-2. Notably, extraordinary circumstances requiring a higher level of environmental review only occur if a numerated circumstance is present *and* the action may have a significant impact. For the proposed actions, the FAA considered whether any of the enumerated circumstances were present and determined they were not. However, even if they were, there is still no indication that the proposed actions may have a significant impact. In particular, the FAA's noise screen revealed that there would be no reportable or significant noise impacts caused by the proposed actions. Similarly, there were no objections from the State Historic Preservation Officers as part of the FAA's determination that there would be no adverse effects to historic resources under Section 106 of the National Historic Preservation Act. Furthermore, none of the comments received from the public presented information to indicate that any of the significance thresholds set forth in FAA Order 1050.1F would be exceeded. For all of these reasons, it is reasonable for the FAA to proceed with approving the proposed actions using a categorical exclusion and determining a higher level of NEPA review is not required. Notably, some of the environmental review and public involvement actions taken as part of the FAA's environmental review are similar to what would have been conducted as part of an EA.

2.0.8 Impact of COVID-19 Topical Response

Some commenters cited the COVID-19 pandemic and its impact on the aviation industry as a reason to extend the FAA's comment period on the proposed action. Other commenters raised concerns that COVID-19 could have affected the ability of the FAA to assess the environmental impacts of the proposed actions or the effectiveness of the HOLT procedure.

While COVID-19 has had a serious impact on operational levels within the aviation

industry, the FAA has determined that those impacts do not warrant an extension of the environmental review period. The FAA's voluntary public comment periods were conducted in an entirely virtual format. The proposed actions were clearly described, including graphics showing the proposed actions compared to the no action baseline and also the noise screening analysis that is being relied upon by the FAA. Therefore, the operational impacts caused by COVID-19 did not affect the ability of the public to consider the proposed actions under consideration by the FAA. Importantly, the FAA's noise screening analysis was based on pre-COVID-19 operational levels.

Despite some commenters' references to COVID-19, there were no specific reasons offered for why COVID-19 warranted an extension of the comment period or undermined the FAA's environmental review. The FAA received hundreds of comments during the comment period – both in favor and in opposition of the project – indicating that the public had notice of the comment period and was able to access the FAA's website. In addition, the FAA's temporary procedure – which was intended to allow the FAA to assess the effectiveness of the procedure – began on January 31, 2020. The FAA was able to assess the effectiveness of the procedure during normal operational levels throughout February and part of March.

2.0.9 Results of HOLT B Topical Response

A number of commenters offered anecdotal feedback on the impact of the HOLT B procedure. Before amending all of the north-flow departure procedures at DCA, the FAA published the HOLT B procedure on a temporary basis to evaluate the effectiveness of the REVGE waypoint. The FAA reviewed radar track data of aircraft flying the HOLT B procedure and compared it to where aircraft were flying using the ADAXE waypoint. The results of the HOLT B procedure indicated that REVGE was working as intended. The radar track data showed that aircraft flew further away from P-56 while still generally flying over the Potomac River and staying within the range of the prior flight corridor. Additionally, the FAA compared the radar tracks to the tracks modeled in its noise screen analysis, and verified that aircraft were flying consistent with how they had been modeled.

Many of the commenters suggested that the HOLT B procedure had drastically changed where and when aircraft were flying. However, the radar track data indicates that some aircraft using the ADAXE waypoint were already flying over the same area flown by aircraft on the HOLT B procedure. In addition, the HOLT B procedure was only used approximately 10% of the time, suggesting it was only partially responsible for the concerns raised by commenters. Noise from operations at DCA have been a longstanding concern for many community members. Finally, the HOLT B procedure did not impact the number of operations at DCA, the time of day of operations, or the fleet mix. The FAA does not control these variables.

2.0.10 Scope of the Proposed Action Topical Response

A number of commenters raised concerns about FAA's past actions or suggested changes to procedures that were not at issue in this proposed action. The purpose of this environmental review and the FAA's public comment period was to consider the FAA's current proposed actions, not to revisit past final agency actions or solicit ideas on potential future changes. The FAA currently serves as a non-voting technical advisor to the DCA

Working Group. In that capacity, the FAA has committed to consider recommendations from the Working Group. One of the actions proposed by the FAA – modification to north-flow westerly SIDs – is in response to a unanimous recommendation from the Working Group. The FAA continues to remain engaged with the DCA Working Group, and interested members of the public may wish to raise their concerns in that forum. More information about the DCA Working Group can be found at the following website: <https://www.flyreagan.com/dca/dca-reagan-national-community-working-group>

In addition, there was a common misconception in many of the comments that the temporary HOLT B procedure affected issues beyond the amended REVGE waypoint. The FAA does not control the number of operations at DCA, the time of operations, or the fleet mix that carriers. Any references to those variables are outside the scope of the project. Additionally, air traffic controllers make runway usage selections based on a number variables, including runway availability, wind, weather, operational efficiency, and other considerations. Comments requesting changes to runway usage were also outside the scope of the proposed actions. Finally, other comments suggested that the project would impact altitudes, arrival procedures, or south-flow departures, all of which is incorrect.

2.0.11 Need for the Proposed Actions Topical Response

A number of commenters questioned the need for the FAA to amend its procedures in order to reduce incursions into P-56. Some commenters suggested that the threat was small given the limited number of incursions compared to the total number of departures at DCA. The FAA respects the role of the Secret Service in protecting the airspace above the White House and other resources within the P-56 airspace, and gives great weight to its assessment of national security threats. The August 2018 request from the Secret Service expressed great concern over an increasing number of incursions and requested that FAA seek to reduce and eliminate aircraft violations into P-56. The Secret Service’s letter was supported with data reflecting an increase in incursions and the FAA believed that amending the ADAXE waypoint would reduce the number of incursions. Following the results of the temporary HOLT B procedure, the FAA determined the new REVGE waypoint was working as intended, based on the fact that radar flight tracks indicated aircraft flying the HOLT B procedure were generally flying further away from P-56 while staying over the Potomac River and within the outer range of the prior flight corridor. Refer to **Figure 1** to view flight tracks for the no action and proposed action alternatives. Refer to **Attachment D** to view the noise screening report.

A number of commenters questioned whether the Secret Service remained concerned about P-56 incursions during the intervening years since the letter was drafted. The FAA has been in repeated contact with the Secret Service since the letter was received, and during that time, the Secret Service has remained concerned about P-56 incursions and interested in the FAA’s progress in amending the north-flow departure procedures.

Reagan Airport Comment Matrix

Comments Received May 15 - June 15, 2020 for Removal of FERGI and addition of RGIII waypoint

Comment #	Public Comment	FAA Response
1	At the DCA Community Working Group meeting on May 28, 2020, the FAA provided a project update concerning its proposed new north-flow route from DCA called HOLT B. That update states that “The FAA is also inviting comments from the public on environmental concerns they believe the FAA should consider as part of its environmental review of the proposed permanent amended waypoint pursuant to FAA Order 1F, Environmental impacts: Policies and Procedures and other applicable authorities.” In my view, this new “opportunity for comment” by other adversely affected parties appears to be window dressing for the FAA’s unlawful plan to institute a major route change without the requisite full Environmental Assessment. I submitted my initial comments and demand for a full Environmental Assessment (EA) in the HOLT B administrative proceeding on March 20, 2020. A copy of those initial comments and demand is attached hereto. The following are my supplemental comments. All federal agencies, including the FAA, are required to comply with the National Historic Preservation Act (NHPA) as well as Section 4(f) of the National Transportation Act. In order to comply with those statutes, the FAA must “consult” with all potentially affected jurisdictions and obtain their views concerning the potential impact on historic properties. See, City of Phoenix v. Huerta, 869 F.3d 968 at 971 (D.C. Cir. 2017), opinion amended on reh'g, 881 F.3d 932 (D.C. Cir. 2018). No such consultation was even contemplated much less undertaken in this case. Instead the FAA consulted, in secret, only with the USSS and the airlines in designing its new HOLT B route, excluding any and all community input. The USSS and the airlines, however, do not and cannot, represent the interests of the surrounding communities and the protected historic properties in those communities. Indeed, the interests of the surrounding communities may well be, and probably are, at odds with the objectives of the commercial airlines. *The remainder of letter can be viewed at the bottom of this Attachment.	Comment noted, refer to Topical Responses for Public Involvement, Noise, Past Projects, and Level of Environmental Review.
2	At 7:50 am an airplane was SO LOUD over our house that it woke everyone up. It was very alarming. Can you tell me what that was? 7:50 is waaaaay to early on a Saturday for something that loud.	Comment not relevant to the proposed project.
3	As a resident of Glover Park, Washington DC, i do NOT support extra noise and pollution where I live; specifically, on April 27, 2020, the FAA submitted a supplemental consultation letter pursuant to Section 106 of the National Historic Preservation Act. The letter includes proposed findings for a procedure change to north-flow westerly departures at DCA, which the FAA intends to make at the same time as it publishes the amended waypoint to reduce incursions into P-56 described in the Background section below. Specifically, the FAA is proposing to remove waypoint FERGI and replace it with a new waypoint, RGIII, which will keep aircraft closer to the Potomac River, consistent with longstanding goals of the Metropolitan Washington Airports Authority. The proposed change was also unanimously endorsed by the DCA Community Noise Working Group, a group comprised of representatives from surrounding communities that is focused on noise-related concerns from DCA.	Comment noted, refer to Topical Responses for Noise and Air Quality.

Comments Received February 27 -March 31, 2020 for the proposed HOLT B procedure

Comment #	Public Comment	FAA Response
1	I request the FAA to continue working to reduce aircraft noise from both departing and arriving planes over the Georgetown waterfront. I understand that planes approaching DCA from the north have to avoid flying into P-56. I urge the FAA to propose a solution requiring planes from the north to use advanced navigation equipment to eliminate this serious problem.	Comment not relevant to the proposed project.
2	I live in the Old Glebe Neighborhood in Arlington, VA 1) Noise levels have gotten significantly worse since the FAA changed the flight pattern at DCA in 2015 (forcing most planes over the neighborhood at lower altitudes) 2) The sheer number and lateness of planes has gotten worse because the FAA has made too many exceptions to its own rule of not allowing planes to/from more than 1,250 miles. There are now more than two dozen exceptions to this rule which means planes from the west coast get here at all hours of the night. 3) Having 30 or 40 planes a day fly over the exact same place at low altitudes can not be good for anyone's health, I don't care which way the wind is blowing. Jet fuel is basically kerosene and being exposed to that, however minor, day after day, year after year is going to add up eventually.	Comment noted, refer to Topical Responses for Noise and Air Quality.

3	<p>I'm writing about the "National Security Request – Amended Waypoint for DCA North-flow SIDS / P56" project. We have lived in the same house in Arlington for over 20 years, and had never paid much attention to the air traffic noise until last year. Out of the blue, the noise began to wake us up in the mornings and continue to be a noticeable distraction during the day and into the night. We began to notice that the first flight of the day was often well before 6 and the last flight often after midnight (previously we understood that flights were not allowed from midnight to 6 a.m.). We are very unhappy that the change in flight patterns has caused so much disruption in our house, and we urge you to find another solution — or a remedy that would meet your goals without having such a deleterious impact on our lives. Thank you for considering our plea not to continue with the current patterns.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
4	<p>The expansion of the National Airport flight path away from the Potomac River and directly over the neighborhood of Bellevue Forest is completely unacceptable. The noise is disrupting the sleep of all members of our household, and has greatly diminished the quality of our life. We feel the attempts to request a reasonable noise abatement strategy to the FAA has been (pun intended) falling on deaf ears for over 20 years. In the past, we were encouraged to be patient for GPS to be adopted to keep flights over the river. That never happened. Adding more flights and expanding the hours of the airport did happen. The rationale for widening the path on the VA side seems very weak. Tightening restricted air space over DC? Almost 20 years after 9/11. What a joke. The distrust over FAA motivations and competency is valid. It seems the citizens of Palisades in DC hired the right lobbyists and “won” the noise war. The war of infectious disease is a bigger threat to our “airspace”. I am saddened that absolutely nothing is done for residents. How about shortening the acceptable hours for take off and landings? How is widening the path mitigating risk to restricted air space? If there has not been a robust reaction from citizens, in is only out of exhaustion and apathy...and frustration with bureaucracy. Please do something to improve this situation.</p>	<p>Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Scope of the Proposed Action.</p>
5	<p>I strongly object to the FAA change to the northbound flight plan in 2015. It has resulted in a dramatic and constant increase in aircraft noise. My children are routinely awake by aircraft noise and I am concerned that it is negatively impacting their education. I strongly support moving the flight plan to the west. Also, I work in Virginia and routinely observe aircraft violating the restricted air space over the national mall. This is a serious national security issue. Finally, I own a historic home built 250 years ago and it is not resistant to aircraft noise. I am seriously considering litigation to compensate me for the unlawful taking.</p>	<p>Comment not relevant to the proposed project.</p>
6	<p>Dear Members of the Arlington Community, To follow up on our recent email about the new north-bound departing flight procedure (HOLTB) at DCA that went into effect on January 31, 2020, I am writing to let you know that the FAA recently informed us that they have opened a public comment period for HOLTB that closes on March 30, 2020. Many of you may have already submitted complaints about the HOLTB change. Unfortunately, it seems prior complaints about the effects of this change will not be officially considered by the FAA in this study. Therefore, we are asking you, even if you have already registered a complaint, to please do so again with the next noise disturbance you experience. Comments should be submitted to the following email address: 9-ATO-DCA-HOLTB-SID-Comments@faa.gov. Don't hesitate to copy us (countyboard@arlingtonva.us) on the email as well. County staff will be reviewing all published documentation with the Board and County Manager to inform next steps and a future course of action, in addition to submitting written comments in opposition to the flight procedure. We strongly encourage all community members who are negatively impacted by this new flight procedure to submit comments to the FAA before March 30, 2020. I truly believe that public protest about these flight changes should help us in making e. Additionally, as you know, we have hired a consultant jointly with Montgomery County to help us work with the FAA to, hopefully, roll back these changes and mitigate airplane noise in general. We hope to have a community meeting with the consultant this spring. Finally, Arlington County is working closely with Congressman Beyer's office on this matter. His office has been very vocal about aircraft noise for several years. We continue to look for partners in our efforts to reduce airplane noise. Please share this information with any of your neighbors who are experiencing aircraft noise issues. I cannot emphasize enough the importance of residents registering their complaints about this matter. We will continue to update you whenever we have new information, and we thank you for your engagement in this matter.</p>	<p>Comment noted, refer to Topical Responses for Noise.</p>
7	<p>I am writing this to let you know that the flights that went over the Groveton area from Reagan at 10:10 am on 3/31, was excessively loud.</p>	<p>Comment not relevant to the proposed project.</p>
8	<p>I urge you to rescind the new north-bound departing flight procedure (HOLTB) at DCA that went into effect on January 31, 2020, This has increased noise disturbance in our neighborhood. The flights should be routed over the river, and now they are routed over the Virginia side. Please also stop flights from disturbing our sleep overnight. Flights should not be allowed to fly between 10 pm and 6 am at the very least.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>

9	Arrival and departure routing over densely populated areas when there is easily available noise abatement routing and procedures, is unacceptable. FAA procedures should keep KDCA traffic over the Patomac River for as long as practicable to avoid disturbing the large population areas and adopt other commensurate noise abatement procedures (altitude/airspeed/configuration restrictions). Please consider adopting a much stricter approach to noise abatement, similar to European aviation authorities. As a Federal	Comment noted, refer to Topical Responses for Noise.
10	woken by plane going over just now -it's 5-30am	Comment not relevant to the
11	Our neighborhood is in the Radnor/Fort Myer Heights area of Arlington County, just west of the US Marine Corps Memorial, and south of Rosslyn and route 50 (North Nash and @12th Streets is the intersection nearest to us). We are very concerned about how the proposed shifting of flight patterns 800 feet closer would impact on our neighborhood. Noise is already a significant issue for neighbors here. Our is the neighborhood planes first fly over when they are taking off. They are closer to the ground and climbing fast when they pass by. Regarding the timing of the HOLT B study, it is clear that due to the COVID-19 outbreak, the testing of the proposed flight pattern has been severely compromised. Aircraft with fewer passengers and less cargo are much quieter during takeoff than those that are full. On cloudy days, when the 'ceiling' is low and planes are taking off to the north, many	Comment noted, refer to Topical Responses for Noise, Results of HOLT B, and Impact of COVID-19.
12	I realize I am one day late, but under the terrible COVID situation, I hope you will understand and so accept my comments. The plane noise from 6AM to around 9:30 AM is absolutely unendurable. It literally rattles my windows. It sounds like a war-zone. PLEASE what can be done to correct this?	Comment noted, refer to Topical Responses for Noise.
13	For the sake of all of us who live in this community, we urge you to change the flight path. The flights wake us up each and every morning in their pre-dawn take-offs. We hear this even with the windows closed. During the day and early evening, we do not sit outside with family or friends because when planes fly over on take-off or landing, the noise is so loud, we cannot hear each other. These flight paths drastically affect the enjoyment of our homes and quality of life.	Comment noted, refer to Topical Responses for Noise.
14	I live at the Georgetown Waterfront and am affected daily by low flying planes directly over my house and the park where I take my dogs to walk multiple times a day. Noise from air traffic wakes me up almost daily, and the planes directly overhead make me and my normally stolid dogs anxious and hurts our ears (yes, mine too). I can literally pinpoint when the major fly times occurred (5:30 - 7 am, noon to 1:30, and about 8 -10 pm). Waking up early and being kept awake due to airplane noise late makes for a difficult day. Please redirect these planes somewhere other than over homes.	Comment noted, refer to Topical Responses for Noise.
15	What a beautiful afternoon and evening to sit outside EXCEPT THERE IS CONSTANT HELICOPTER NOISE. it seem to be continuous but especially between 8 and 9 I can actually feel the vibration even more than just the noise. Their appear to be flying low along 395- but they never stop! Theres no traffic on the freeway so why cant they just DRIVE? Please consider altering the Pentagons abusive use of helicopters. And right now I hear an airplane (9:22PM). while sitting I side with the TV on. Please add this to the list of complaints about the altered air patterns.	Comment not relevant to the proposed project.
16	As a current resident of the Rock Spring neighborhood of Arlington, I am writing to oppose the "new" air traffic route from Reagan National Airport. I am concerned by the low flying planes over Military Road, and the noise levels from 5:30 AM until midnight can be unbearable. The current takeoff flight path has planes arching over Rosslyn, the water treatment plant in Maryland and then turning hard left over Potomac Regional Park in Virginia. This is followed by another turn back over the Potomac River. The landing route is similar, and over Potomac Regional Park and down through Rosslyn. The solution seems simple. Restore the flight path down the middle of the Potomac River.	Comment noted, refer to Topical Responses for Noise and Need for the Proposed Actions.
17	As a resident of the Palisades and a member of the Palisades Citizens Association, I write to endorse the comments submitted on March 25th by the DC Fair Skies Coalition. In particular, I believe that the proposal to move the flight path 784 feet to the west will result in a significant environmental improvement, i.e., decreased aircraft noise, in addition to addressing other objectives related to increased national security and reduction in pollution. My understanding is that the decrease in turns allowed by the new flight path could be expected to decrease noise on both sides of the river, so this is not just a trade-off between the interests of one set of local residents and another, but rather is an option that is better for everyone.	Comment noted, refer to Topical Responses for Noise.

19	<p>The most significant environmental impact upon our household is caused by the noise pollution, particularly beginning at 5.45am every morning, and running past midnight. It steals valuable sleep from myself and my children in their precious developmental years. Adults should not be asked to sleep on less than 5 hours sleep every night in their own home, and children should have the right to live in a neighborhood that does not consistently disrupt their sleep and affect their learning potential. Flights should not be allowed to depart anytime between 10pm and 7am to allow people enough time to have a decent nights sleep. While COVID-19 is of course a national emergency, one looks for silver linings and what we can learn from situations that change in a crisis that would never otherwise have changed - like the dramatic reduction in departures and arrivals at DCA. The current noise level in the last days of March 2020 is manageable - it is the sheer volume of departures and extended hours (5.30am – past midnight) beginning January 2015 until mid-March 2020 that are the main complaint and that negatively affect our environment. Neighbors can now speak to each other from their gardens. National security is also a huge concern: one watches the planes flying over downtown and Georgetown and wonders how on earth that was ever allowed in the first place. It is like watching a disaster waiting to happen. Highly unnerving. Please continue with plans to keep planes further from the Naval Observatory, the mall, monuments, office buildings and residences downtown and in Georgetown.</p>	Comment noted
20	<p>Per the wtop article (https://wtop.com/business-finance/2020/03/upset-by-reagan-national-airplane-noise-faa-now-taking-comments/) I am writing to object to the new proposed flight plan coming in and out of DCA. I understand this was related to intrusions into the DC air space, but I believe it would be better to just make sure planes follow the ACTUAL flight path their supposed to, rather than move the flight path further over Virginia to allow for pilots to miss the path. All too often I see planes flying directly overhead in the Bellevue Forest neighborhood – way off the flight path – rather than over the river. I fear moving the flight plan further towards Virginia would just exacerbate the problem.</p>	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
21	<p>Every morning around 7am I am woken up by the noise of aircrafts taking off every minute or so in peak times. I do wear earplugs though, but to no avail. And then I hear them all day long until midnight at least. It is excruciating. I wake up every morning with a headache. Inside my apt outside nowhere to escape, nowhere to hide. Have to drive my car to Maryland if I want to escape... Only solution is to move out. Pity! I love my new neighborhood and can't afford to leave right now! Never experienced anything like it before... No curfew in this country... very strange. Europe and Australia (where I used to live) protect their citizens, not so much here! Pity...Also, we do protect people's privacy there.. Wish it were the case here and ask respectfully for my data NOT to be shared/sold with anyone... Thank you for listening and remembering that protecting your citizens's health should be a priority!</p>	Comment noted
22	<p>I remain very concerned that noise as been transitioned unduly, and to a much larger share of total airplane noise, over District of Columbia than is reasonable, presumably simply because neighboring Virginia has more powerful Members of Congress. Moreover, I am exceedingly concerned about the easier, more prevalent, and more numerous violations, and near-violations, of airspace in/over/near the restricted P56 zone (Naval Observatory & Vice President's offices/residence), as neighbors will be heavily impacted when the time/distance buffer is shorter amid perceived attacks -- more buffer is important for everyone, both for the neighborhood and for continuity of government, and more time/distance is important for avoiding misunderstandings or costly mistakes dealing with aircraft near a national security concern.</p>	Comment noted
23	<p>I appreciate the FAA's attempts to respond to the requests by the Secret Service to move the flight paths closer to the river. The constant noise of planes overhead are taking their toll on our neighborhood, with many residents being forced to sell their homes and relocate. We have already relocated once as a result of the nextgen flight path, and hope to avoid doing so again.</p>	Comment noted
24	<p>Good Afternoon, I am writing to complain about the negative impact that increased noise levels due to new flight paths into and out of Reagan National Airport is having on my household. Ever since the new flight paths were adopted, my house is regularly woken up by the noise. We have a 21-month-old daughter whose sleep routine is impossible to maintain with such noise levels, particularly if the airplanes take off toward the south. We would benefit greatly if the flight paths were reverted back to what they were before this recent change.</p>	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
25	<p>Please make permanent the temporary procedure, known as HOLTB, for all north-flow departures at DCA. This change greatly alleviates the environmental noise problem created by the previous routing procedure.</p>	Comment noted
26	<p>I support moving the flight tracks to the west. In fact, I support returning to the rules or standards that were in place from 1995, when we bought our house, until recent years. No flights before 7:00 a.m. and no flights after 7:00 p.m. No through flights. DC destination only. 3:00 minutes between takeoffs. There is a reason airports are located outside of cities. DCA should be special purpose. It's clear that the airlines got cozy with whoever is in charge and made changes without public input.</p>	Comment noted

27	Implementation of the HOLTB and other proposed SIDs that use the REVGE initial northbound fix will have a substantial negative effect for residents of Arlington Virginia due to increased noise for this densely populated area. This navigation fix is the latest of several attempts by the FAA and Secret Service to move northbound DCA departures west away from P56-A. I am a pilot for a Part 121 carrier with considerable experience departing DCA and there is no need to make this change. There are a variety of other measures that could be used to address Secret Service and FAA concerns about incursion on P56-A including minor adjustments to the west bounds of P56-A. What analysis has been done of the additional noise this will inflict on residents? What alternatives have been considered? In the 20 years since the September 11th attacks why haven't modern security measures been developed to protect Federal Government facilities rather than putting the security burden on residents of Arlington, surrounding communities and aviation? Surely we can do better than sacrificing the people who pay taxes. Please reconsider repeatedly asking us to sacrifice for problems that can be addressed in other ways.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
28	Multiple commenters: The new flight pattern that was instituted about a month or two ago is an improvement, although I am still awakened from time to time at 5:30 am by overhead airplanes, I fear that this will be more of a problem when the weather is warmer and I want to open my windows.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
29	My family supports the Secret Service's request to move the airplane route over the river for the safety of DC and due to the noise pollution that it causes in our home.	Comment noted
30	I support making the temporary change (HOLTB) in the path of north-bound aircraft from DCA permanent. I believe national security concerns (e.g., incursion of aircraft into restricted airspace) should be weighed somewhat more heavily than personal comfort; however this situation has provided something of a Solomonic judgement in the issue of aircraft noise endured by residents on both sides of the Potomac River in the flight path in and out of DCA. While it's possible that Virginia residents may experience more noise with the new flight path of northbound traffic OUT of DCA, residents of the District will continue to endure their quota of noise from INCOMING aircraft. It seems reasonable that the discomfort be shared. Thank you for considering.	Comment noted, refer to Topical Responses for Noise, Scope of the Proposed Actions, and Results of HOLTB.
31	Please change the fly routes to Arlington. The noise is unbearable and planes represent a national security risk.	Comment noted
32	Please give the Palisades a break from low-flying planes right over our houses. We are stuck in our homes with the pandemic, and can't sit outdoors without being buzzed by big, noisy planes. We can't open our windows. Please make it stop! My husband and I are elderly and want to enjoy our remaining years in peace ... and QUIET.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
33	I moved to the corner of Reservoir Rd and MacArthur Blvd in the summer of 2014 with the full understanding of living near the DCA flight paths. The noise level then was acceptable. In the summer of 2015, everything changed with the departure routes shifting east from the 328-Radial towards DC. The environmental impact due to the "real" noise levels felt by thousands and thousands of residents in NW DC, along with the increased emissions dumped on city residents, was appreciable and unbearable. The proposed change will, not only, address a serious National Security concern raised by the Secret Service based on the confirmed increase of incursions into the restricted P-56 zone since the departure shift east to DC, but will greatly mitigate the environmental impact on DC residents who had to live under the unilateral change imposed by the FAA. The environmental impact to Arlington and Rosslyn will not go beyond the original impacts from the 328-Radial departure that operated for over 60 years until the unilateral and illegal shift east towards DC.	Comment noted
34	Please maintain arrival and departure flight paths over the river, but especially the arrival flight paths. The departures quickly reach a higher altitude. The arrivals on visual flight path follow the river and often glide into the airport. The arrivals on GPS routes grind-down to low altitudes right over hospitals, businesses, schools and homes in NW Washington - the noise/volume is unbearable. Also, in the post-Corona environment, please return to a reasonable flight schedule, say 6 am - 10 pm. Flights before and after those times are terribly disruptive.	Comment not relevant to the proposed project.

35	<p>The Attorney General for the District of Columbia (“DC AG”) respectfully submits the following comments regarding the Federal Aviation Administration’s (“FAA”) Temporary and Proposed Implementation of Airspace Changes (“Proposal”) at Ronald Reagan Washington National Airport (“DCA”) in Arlington, Virginia. The DC AG supports the general concept to change the existing departure route (LAZIR) from DCA due to incursions into Area P-56 restricted airspace over the National Mall. However, the DC AG encourages that, prior to finalizing its proposal, the FAA perform a comprehensive environmental impact assessment (“EIA”) that identifies alternatives and measurable impacts to affected communities and area resources. A comprehensive EIA, subject to further public review and comment, will provide necessary transparency, informed public comment, and support for the FAA’s final decision. The DC AG submits that the contentious history regarding previous changes to DCA departure routes should inform and guide the proceedings for the FAA’s current proposal. Numerous public meetings, petitions, and legal challenges have exposed the inadequate foundations for prior decisions to change DCA departure routes. Throughout these past proceedings, the FAA has never performed a comprehensive EIA – a requirement under the National Environmental Policy Act (“NEPA”), 42 U.S.C. §§ 4321–4370m, one of a number of statutory and regulatory schemes that are designed to account for all impacts of a “major Federal action significantly affecting the quality of the human environment.” Id. § 4332(C); 49 U.S.C. § 40103(b)(1); Environmental Impacts: Policies and Procedures, FAA Order 1050.1F (July 16, 2015). At a minimum, NEPA requires the FAA to prepare an environmental assessment (“EA”) to determine whether the action will cause a “significant’ environmental impact,” such as by substantially increasing noise levels. 40 C.F.R. § 1508.13; City of Dania Beach, Fla. v. FAA, 485 F.3d 1181, 1189 (D.C. Cir. 2007) (citing 40 C.F.R. § 1508.9(a)). Considering these statutory and regulatory mandates and citizen concerns, the DC AG encourages the FAA to perform a comprehensive EIA and provide a draft of the EIA, once completed, for review and public comment prior to both finalizing the EIA and issuing the final decision regarding the proposal. Because this proposal affects “noise-sensitive areas”, pursuant to FAA Order 1050.1F, App. B, the EIA should include a rigorous noise monitoring analysis rather than a modeled noise screen. A modeled noise screen is not a rigorous analysis, as it relies on simplistic and often unrealistic assumptions that do not reflect actual noise impacts. The DC AG submits that no affected community should be burdened unfairly or unreasonably by the potential impacts of this proposal. The citizens of those communities are equally entitled to a complete and comprehensive public record that supports the FAA’s decision and upon which they can articulate either their agreement or objection through informed public comment. For these reasons, the DC AG encourages the FAA, prior to finalizing its decision, to engage in the appropriate study of all of the impacts of this proposal through a comprehensive EIA subject to public comment. To the extent necessary to complete that process, the DC AG recommends that the FAA extend its trial period to prevent further incursions into restricted air space. By considering and balancing all interests and impacts in accordance with regulatory imperatives, the FAA will promote transparency and informed public comment, alleviate procedural errors in past decision-making, and minimize future challenges of the FAA’s decision.</p>	<p>Comment noted, refer to Topical Responses for Noise, Level of Environmental Review, and Results of HOLTB.</p>
36	<p>Although this notice seems to address northbound departures from DCA, there has been a significant change in the route of southbound arrivals into DCA which has resulted in very intrusive aircraft noise in our neighborhood. I've lived in this location for more than 20 years, and I understand that some aircraft noise is necessary. However, planes used to fly down the river, not low over our homes. For the years the planes flew behind my home, over the river, but now they fly directly over my home or even to the west of my home over the whole neighborhood. Please shift the southbound landing pattern into DCA back to the river, not over Bellevue Forest.</p>	<p>Comment not relevant to the proposed project.</p>
37	<p>Planes consistently deviate from the river traffic path, creating lots of noise over the Palisades. Sometimes this may be a result of poor visibility, but often this is not the case. In other words, even on clear days, planes are way off course and overhead. I hope this can be addressed.</p>	<p>Comment not relevant to the proposed project.</p>
38	<p>I live near the Potomac River in Glen Echo Heights and the constant drone of planes overhead is so a consistent source of tension and frustration for my family. I hope you'll change the flight paths so not so many are coming in this vicinity. They were always bad but it's been awful since the change.</p>	<p>Comment not relevant to the proposed project.</p>
39	<p>Keep the air traffic over the Potomac River as much as possible. If that’s using HOLTB, then keep using it.</p>	<p>Comment noted</p>
40	<p>As a new Alexandria resident, I was stunned to learn then experience the increased noise coming out of Reagan. It is unconscionable that your organization would authorize such a change bringing the flights 800 feet closer to a densely populated area. Sleep deprivation is a major national health issue, and residents along the Potomac are treated to rather audible flight noise running past midnight, only to begin again as early as just before 6 AM. For many, that’s 5 ½ - 5 ¾ hours under the best of circumstances, well short of the 7 hours recommended by most health organizations. I need not list the many deleterious effects of sleep deprivation, suffice it to say the negative impact on job performance, bodily damage/illness recovery and peoples’ overall attitude are rather well documented. The vast majority of these residents live in older townhomes which lack sound insulation. Thus, thousands are not getting the minimum recommended sleep they deserve. Moreover, the future growth along the river is centered in the sector north of Alexandria’s City Hall, that much closer to the takeoff/landing zones. I recommend the FAA move the light pattern not only 800 feet back to the previous point, but consider moving it further east, where there is not nearly the population relative to Alexandria and its Old Town and Del Ray neighborhoods.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>

41	I am writing to complain about the negative impact that increased noise levels due to new flight paths into and out of Reagan National Airport is having on my household. Ever since the new flight paths were adopted, my house is regularly woken up by the noise. We have a 21-month-old daughter whose sleep routine is impossible to maintain with such noise levels, particularly if the airplanes take off toward the south. We would benefit greatly if the flight paths were reverted back to what they were before this recent change. We will have to consider moving due to high noise pollution if this stays as is and will be interested in learning whether there will be any financial assistance offered to families severely impacted by this change.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
42	When we are outside our homes, we are unable to hear each other speak when a plane flies over unless we are yelling. A plane flies over approx every 15 seconds. Every morning at approx 530 am the planes start flying over head and wakes us up. It is hindering our daily life. Please, please consider changing the flight path.	Comment noted, refer to Topical Responses for Noise, Scope of the Proposed Actions, and Results of HOLTB.
43	: I am writing to complain about the negative impact that increased noise levels due to new flight paths into and out of Reagan National Airport is having on my household. Ever since the new flight paths were adopted, my house is regularly woken up by the noise. We have a 21-month-old daughter whose sleep routine is impossible to maintain with such noise levels, particularly if the airplanes take off toward the south. We would benefit greatly if the flight paths were reverted back to what they were before this recent change.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
45	The airplane noise and traffic from DCA has become terribly bothersome. The planes fly directly over our house and there seem to be more of them doing so. I request that this situation be remedied to the extent possible.	Comment not directly relevant to the proposed project.
46	There is no reason for airplane route changes over residential Alexandria - return to the route following Potomac River avoiding population density ASAP!	Comment not directly relevant to the proposed project.
47	I'm pleased the residents of Arlington County have been given the opportunity to voice our concern about the noise from the DCA airport. I've lived nearby at xxxx for the past 6 years and it wasn't until recently that the sound from airplanes has bothered me. In 2019 there was a noticeable increase. I'm hearing them now in the background as I'm writing this email late at night. It's gotten so bad I need to sleep with earplugs or will be awakened early in the morning around 6am from the sound of planes flying overhead. The morning air traffic from planes taking off is more disruptive than the nighttime. If there can be special consideration about the neighborhoods we'd greatly appreciate it.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
48	I appreciate Arlington looking out for the well-being of its citizens and realize both northern VA and DC need to share in the problem of aircraft noise pollution. I am sound sensitive and enjoy quiet, as many do in this region. Someone posted on NextDoor how nice it has been with Coronavirus and the decrease in flights, and I agree. I do not work outside when planes are flying north. I wake up at approximately 6am every day planes are flying north, due to noise, and have to turn on a white noise machine next to my bed so I can go back to sleep. I close windows in the summer to dampen the noise, which unnecessarily increases HVAC usage, which is bad for the environment. Moving the flight path towards Roslyn has increased the noise. I am retired military and lived near/on airbases in Iraq and Afghanistan. The noise reminds me of being there and I try to use music or other methods to mask the noise during all times when flights are travelling north. What is the real reason the flight path was moved 784 feet west? I have read it is for "national security" but if a plane is travelling at approximately 200mph on take off and landing, what is 784 feet going to do? A plane can go that distance in 2.5 seconds. Are there politicians in the Georgetown area who were able to get the flight path moved west using the guise of "national security"? If this was a national security issue, DCA should be shut down. Move the flight path back to over the river which is safer for everyone. This area is growing in size. I realize DCA is focused on increasing profits but increased flights, but at some point, regional leaders should weigh the psychological damage to everyone who lives on the flight path, as evidence shows the damage from aircraft noise pollution. As population increases, and direct lines such as a metro can go to Dulles, it is time to investigate if DCA should be closed and made into a public park for everyone to enjoy. There are less people around Dulles and BWI that will be affected by increased aircraft noise.	Comment noted, refer to Topical Responses for Noise and Need for the Proposed Actions.

49	I write to voice my strong opposition to permanent implementation of the HOLT B procedure, which has increased environmental and noise pollution in the North Highland residential neighborhood of Arlington, Virginia. Moving the waypoint in question 784 feet southwest pursuant to the request of the U.S. Secret Service has significantly increased the negative impacts of the many planes that fly directly over my neighborhood. I reside on 21st Court North in the Palisades Park community, and our development is essentially in the flight path of Reagan National Airport. Despite a decrease in flight traffic owing to the COVID-19 pandemic, I still regularly am bothered by significant flight noise at a higher decibel level than prior to the waypoint shift. Noise pollution was a serious consideration when I made the decision to move into this neighborhood, and the noise has only gotten worse since I moved here in 2018. For example, on the morning of Saturday, March 28, I was awoken by successive incoming flights at 6:12 and 6:13 am. The flights continued after that. The noise has a negative impact on residential life in the neighborhood. I strongly encourage the FAA to reconsider permanently implementing the amended waypoint. The FAA should keep flights well over the Potomac River, where they belong. While I have reviewed the concerns of the U.S. Secret Service, I do not believe the increase in P-56 incursions “over the past few years” (according to the U.S. Secret Service) is sufficient cause to burden thousands of taxpayers with increased noise and environmental pollution.	Comment noted, refer to Topical Responses for Noise and Results of HOLT B.
50	I know there may be various factors to consider. The factor I can comment on personally is that the noise since planes shifted from the river path to fly directly over the Palisades in DC has directly and negatively impacted my health. The planes sometimes fly over my house into the wee hours of the morning and start again at or before 6 am so that is impossible for me to get the recommended hours of sleep. Moving the planes to the west would offer some relief from the undue noise of the planes flying over. Another way to increase safety and reduce noise would be to return to restrictions upon planes landing/taking off from National Airport between 10 pm and 7 am. Please do either or both -- move the planes to the west and /or restricting airplane operations between 10 pm and 7 am. Experts agree a person my age should sleep 7-8 hours at night.	Comment noted
51	Sunday evening trying to sit outside and enjoy the evening but it's like sitting at the end of the runway !! this is terrible -- the FAA should stop pandering to the airlines and go back to the old river route	Comment not directly relevant to the proposed project.
52	one plane after another going over— seriously don't they have another route to go over the DMV area? go back to river route	Comment not directly relevant to the proposed project.
53	I would like to register my complaint about the airplane noise over my house in Bellevue Forest. It has gotten progressively worse since I moved here 13 years ago. I understand this is partly due to a change in flight paths. This is patently unfair. You should spread the noise around.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Scope of the Proposed Actions.
54	I write to strongly support the DC Fair Skies Coalitions comments on the FAA's proposal to permanently implement the temporary procedures put in place on 01/31/20 for departing northbound flights from National Airport. Our national security should not be compromised by commercial flights penetrating the prohibited zone (P-56) nor should our historic monuments and historic buildings and neighborhoods on the east side of the river be subjected to the well-documented adverse impact of plane pollutants on buildings. I would also urge the FAA to continue working with the DCA Community working group to reduce not only the adverse impact of planes departing from National, but also planes coming into National Airport. Thank you for your consideration of these comments.	Comment noted
55	I agree with the new FAA Flight Procedure: HOLT B that will move the flight path further south for Reagan and would like to see it implemented. The recent change has brought planes directly over the university leading to noise pollution, safety concerns for the student body, and significant safety concerns for Washington DC. I would agree to move the planes to fly over the Potomac.	Comment noted

56	<p>Given that the proposed change to northbound departure flight path from KDCA increases national security and, assuming that the FAA's assessment is correct that it does not increase noise beyond the baseline, I and many of my neighbors are in support of the change. However, there are a number of additional changes that the FAA should take into consideration that would mitigate national security risk to a greater degree than the currently proposed changes. It is unclear why the FAA has not implemented these, particularly as they would both mitigate national security risk as well as reduce noise and air particulate pollution. Changes to flight operations and paths at KDCA that would reduce risk to national security include, for example: • Increasing the proportion of south-flow departures (reducing the number of fuel-laden aircraft flying towards national security targets) • Requiring a much faster climb rate – e.g., to 10,000 feet (faster departure from P-56 and other potential targets, and giving responders more reaction time to suspicious tracks) • Restricting the size of aircraft operating at KDCA (reducing the impact of a single catastrophic terror act) • Eliminating or significantly scaling back operations between 10pm and 7am (reducing the overall risk when defenses tend to be less at the ready, and are compromised by darkness) These additional actions would drastically reduce the risk to national security and would also have a beneficial impact on our national monuments, schooling, and physical and mental health. As the FAA is well-aware, the change the FAA made in the northbound flight path in 2015 resulted in a significantly increased noise over Northwest DC. Indeed, the DC Airplane Noise Assessment (September 2018) found that learning in DC schools was being negatively affected by aircraft noise, and that nighttime noise levels inside of northwest DC residences were high enough to awaken between 12- 33% of the population. (p.135 of the Assessment Report). In addition, over the years the increased frequency of operations as well as increased size of aircraft has dramatically increased air pollution, as evidenced by the impact on our national monuments around the Tidal Basin and elsewhere. KDCA was never intended to be operated in the manner and volume it is operating today. The FAA, MWA and Congress have created a situation in which it is not a matter of if, but when a disaster will happen – either terrorist-related, or accidental. The FAA has an opportunity to go beyond the current proposed changes relating to P-56 (which I and my neighbors support) and significantly mitigate national security risk. We hope that the FAA will seriously consider the additional changes noted herein.</p>	Comment noted
57	<p>I agree with the new FAA Flight Procedure - HOLT B - that will move the flight path further south along the Potomac for Reagan National Airport. I recently flew and it was alarming to me that we were flying over the mall and the monuments. This will effect tourism and potentially our national safety and we should move the path away from the district.</p>	Comment noted
58	<p>The new air traffic pattern over North Arlington brings a very noticeable change to the noise level in North Arlington. The new flight path takes planes right over Potomac Overlook Park where people are trying to get outside to relieve the daily life stresses and exercise. My wife in go on daily walks on the trails in the park. About once a minute we have to pause our conversation until the plane passes directly overhead and then try to finish a thought before the next plane comes. The new flight path has basically ruined the outdoor experience that we used to enjoy, Please return the path to the original. Instead of penalizing the residents for planes flying to close to the white house, penalize the airlines when deviate from the required path.</p>	Comment noted, refer to Topical Responses for Noise and Results of HOLT B.
59	<p>To Whom It May Concern, I'm writing in favor of FAA procedure HOLBT, in order to shift air traffic away from the Foxhall Village neighborhood. We live in Foxhall, and for the last few months the plane noise has been nearly unbearable.</p>	Comment noted
60	<p>Moving the flight path as proposed will ease the noise and consequent health burden on the Palisades and spread the inevitable problem to a wider public of folks to share the benefits of being close to Reagan. Finalize and approve it.</p>	Comment noted
61	<p>NW DC has been the recipient of over the top airplane noise for years. Please implement the new flight rules for planes departing to the north to ease this horrible daily intrusion into our lives.</p>	Comment noted

62	<p>My family and I live in Arlington County, Virginia, in the Maywood neighborhood. The change in flight paths to and from Washington National Airport (DCA) implemented recently has created excessive and disturbing aircraft noise in our community.</p> <p>I have written to Arlington County officials on multiple occasions to urge them to protest to the FAA regarding the increase in air traffic over Arlington County. The increase in noise and vibration from aircraft was dramatically noticeable in our Arlington neighborhood, and is intolerable. I can imagine that the noise and vibration has been severe and disturbing in many Arlington neighborhoods. The loud flights continue late into the night and begin extremely early in the morning. Both the noise and the schedule are disturbing to sleep, peace and quality of life for all the families of our community. My family and I urge the FAA to return planes to their route over the Potomac River immediately, for the health, welfare of children and all residents of Arlington County. We are blessed that the Potomac provides a natural pathway to and from DCA that allows flights to take off and land with minimal disruption to residents and workers on both sides of the river. Flight routes should follow the river, as they have done in the past, rather than over Arlington. I understand that the FAA has allowed a shift in the route of flights in order to supposedly provide more protection for federal workers on the Washington bank of the river. Such an argument is ridiculous and disgraceful. If that was the basis for the decision, then whoever made that decision should be ashamed. The implication is that welfare or safety of federal workers during the day inside low-rise offices is somehow more important than the welfare or safety of U.S. citizens living and working in the towers of Rosslyn and of the families living in residential towers and neighborhoods of Arlington. Having lived in Arlington for 25 years, our family has always recognized that some aircraft noise is a part of life in the area. The trade-off is one we accepted as the price we pay for the accessibility of Washington National airport so close to Arlington. However, the rerouting of flight paths by the FAA over Arlington rather than directly over the Potomac significantly increases the negative impact for reasons that have not been transparently shown to be balanced and have not been subject to an appropriate or adequate environmental or public health reviews. The FAA must reverse the flight path change and return aircraft to a flight path over the Potomac River.</p>	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
63	<p>The FAA Report says "Consideration of Extraordinary Circumstances: Based on the FAA's noise screening study that indicated no reportable noise increases would occur as a result of our proposed action, the FAA considered the extraordinary circumstances set forth in FAA Order 1050.1F § 5-2(b) and determined none of them to be present." Apparently this determination was made using a computer model rather than on the ground using sensing devices. As a long time Bellevue Forest resident (since 1988) I can tell you aircraft noise is now much more noticeable than in the past. My barometer is the noise each morning when I get up. When the flights begin to fire up around 5:45 it is now like an alarm clock going off. You definitely can't keep your windows open or the noise would be unbearable. But even with windows closed the noise is definitely grater than in the past and enough to wake me up each day. If I had the equipment and the historical records I would be happy to record the decibel track of the planes to make this more analytical. I don't have this opportunity but it is clear the new flight path has impacted the neighborhood I live in and others around it. To have a determination of no reportable noise increase clearly means the writer did not actually go and measure the noise impacts on the neighborhoods below the new flight path. The noise is notable greater and should be documented as such using sensors on the ground rather than a computer model.</p>	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
64	<p>The noise from airplanes flying over the neighborhood of Foxhall Village remains at an unacceptably high level. At times, conversation must cease because the noise from the engines makes it impossible for one person in a room to hear another. The noise also makes it impossible for those of us who work at home to concentrate on what we are reading and writing. Please reroute this air traffic so that we may enjoy some tranquility in our daily lives.</p>	Comment not directy relevant to the proposed project.
65	<p>I am in favor of the new FAA flight procedure - HOLBT.</p>	Comment noted
66	<p>The jets have been shifted over to the Arlington Va side of the river (I know because I fly for the airlines) They should be shifted back over the river. Also, we should have a curfew of 10 pm to 7 am.</p>	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
67	<p>Please implement takeoffs and landings that follow the NAtional 1 departure along the confines of the Potomac River. Our neighborhood, Colony Hill, is greatly impacted to the unfair and dangerous routing of airplanes over our neighborhood as has been implemented under the LAZIR routings and the NEXTGEN program. We were not provided with sufficient FAA notice and comment when this was first implemented so it is vital that the previous routing over the river be returned as the default routing for flights. In addition, pilots too often default to the beacon approach which goes directly over our neighborhood even in clear weather. This should not be allowed to happen. Please return the takeoffs and landings back to the river where impacts to people and neighborhoods are minimized.</p>	Comment not directy relevant to the proposed project.
68	<p>The FAA provisional plan, HOLTB, should be made permanent as it affords greater national security protection and a modicum of noise relief to neighbors.</p>	Comment noted
69	<p>Please do NOT route the flight path over DCs Foxhall/Palisades neighborhoods until at least 7 am. The planes begin just after 5:30 am and we are constantly awakened. It's very disruptive to our sleep and overall health.</p>	Comment not directy relevant to the proposed project.

70	Please move the flight path away from DC, Georgetown and back to VA. The planes are horrifically loud, and fly so low that the windows rattle and it's impossible to even hold a conversation outside	Comment noted
71	fist plane going over — tried to go back to sleep but then they started again just before 6 am go back to river route and have a curfew like all civilized countries do around city airports— the airline industry should not rule everything you do!!!!	Comment not directly relevant to the proposed project.
72	Please stop the flights directly over our houses...please direct them over the Potomac both inbound and outbound. The noise when they are overhead prevent us from having a normal conversation with neighbors or speaking on our cell phones.	Comment not directly relevant to the proposed project.
73	It is well passed time that flights in DC were routed so that they didn't create so much noise that we cannot hold a conversation or get to bed. Thank you for listening to our concerns.	Comment noted
74	I agree 100% with the FAA Flight Procedure HOLBT and would like to see it implemented immediately! Thank you for your consideration.	Comment noted
75	I'm a resident of the Bellevue Forest neighborhood of Arlington, VA. We have noticed a significant increase in loud air traffic coming in and out of DCA recently. The planes are now essentially directly overhead and are disturbing the peace of the neighborhood and interrupting sleep, starting at around 6am. This new flight path is unacceptable.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
76	I live in the Arlington Ridge neighborhood. In the last year or so the noise of planes has definitely increased. It seems the flight paths have been altered to take off over the neighborhood in some cases. We already get a huge amount of noise from the low flying helicopters used for commuting to the Pentagon in groups of 3, seemingly only 30' overhead. With the rather new addition of airplanes taking off overhead, it really is a nuisance and can't be good for the air and atmosphere. Once upon a time the incoming and outgoing flight path was restricted to the Potomac River path, so the change is noticeable. Further compounding the impact of high vehicular traffic and helicopter noise that has increased, airplane traffic adds to the cacophony and pollution we are forced to live with seems an undue burden for this neighborhood.	Comment noted, refer to Topical Responses for Noise.
77	Since the change in flight paths in January, we have experienced significantly more aircraft noise at all times. This has abated with reduced flights at National. Maybe that is the solution.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
78	I live in the Maywood district of Arlington County Virginia and have been distressed by the recent increase in aircraft noise over my home. The noise wakes me in the morning and, since I work at home, is highly disruptive during the day. I live in a well insulated home with insulated windows and the noise is still disconcerting. The problem is made worse by the fact that noisy aircraft often fly near my house even late at night. Last night (for example -- 3/27/20) two very noisy aircraft flew over at about 10:20pm. I've frequently been awakened by aircraft flying over near midnight. I've been told that modern auto-pilots can allow planes to glide to a landing at greatly reduced power (and noise levels) without compromising safety. If this is possible, I hope that it can enter your considerations.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
79	The noise of planes in the current route going over Georgetown is incredibly loud in the early morning before 6am. This past week planes blasted the skies three times before 6am. The noise had been reduced considerably when the planes followed the course of the river. Please return to that earlier route. The current hypotenuse route is jarring to the northwest communities abutting the Potomac River.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
80	I live in a 19th century brick house in Georgetown. The noise of aircraft is detrimental to our quality of life, it's louder than the television and goes on from early in the morning until late at night, there's no escaping from it except for a few short hours at night.	Comment noted, refer to Topical Responses for Noise.
81	I support the DC Fair Skies Coalition comment. I have lived at my current address in Georgetown since 2010, and agree that the aircraft noise level has risen substantially, especially with the flight path change. It is a significant intrusion into our lives often waking us up. It makes it much more difficult to enjoy even sitting in our yard. The noise can even disrupt conference calls when I use the speaker. The sounds rattle our single pane windows and interfere with the quiet enjoyment of our home. Any movement of the flight path that reduces this unfortunate interference with our lives would be most welcome.	Comment noted
82	The noise from aircraft has increased considerably recently, despite the slowdown in travel and flights. The planes no longer seem to follow the river, choosing a path right over our house all day long. A handful of planes every day are massively louder than others and should be banned from airports near dense residential areas like DCA.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.

83	I am emailing a noise complaint of low flying helicopters, and some commercial jets, over my house and neighborhood - constantly!! They are so noisy that I cannot even speak to my family or neighbors when they fly by. Some afternoons, six to ten helicopters fly over and even in the evening they fly by. They are not police or military-type helicopters. Are they helicopters from National flying passengers to Dulles (although due to the Chinese flu, fewer helicopters flying overhead so I suspect that is related.) On occasion, military jets fly over following a ceremony at Arlington National Cemetery - those jets are fabulous and NO complaints about them.	Comment not directly relevant to the proposed project.
84	Moving the flight path south of the river is only the most recent betrayal of the citizens of North Arlington. Time limits (7am - 11pm) were blown away. Aircraft flight distance (and therefore size and therefore noise) was increased. And now after years of study and months of community involvement we are supposed to believe that the centerline of the Potomac is no longer safe for the White House. Not credible! Please, do not impose this nuisance and health hazard on your own citizens. Thanks	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
85	since you changed the flight routes in the past 3 years this has become unbearable -- flights overhead are very loud and frequent -- we are woken up sometimes as early as 5am , and we can not sit out on our deck at night anymore . conversations with people in the street are routinely interrupted by aircraft noise. I have lived in Foxhall Village 20007 since 1990 -- flight noise was not too bad until the routing was changed a few years ago-- the FAA should be ashamed for doing this	Comment noted, refer to Topical Responses for Past Projects.
86	Now there is one loud plane after another directly overhead for the past 90 minutes This is not fair and unnecessary —go back to old river route	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
87	<p>To whom it may concern, my neighborhood, Lyon Park has experienced a significant and at times unbearable increase in noise during the past few months. The constant noise has caused many sleeping issues and great distress to our family. I am respectfully requesting a delay in the permanent implementation of new flight procedures. Further research should be conducted to find a solution that will have less impact on the Arlington community.</p> <p>Specifically, I would like to see the following points considered when attempting to find a solution:</p> <ol style="list-style-type: none"> 1. The number of incursions appears very minimal over the last 6-7 years. Just 300 over that time span would suggest maybe 1 in 1000 flights? Why would the FAA cause great distress to tens of thousands of residents without first exploring other options. Especially when the frequency of incursions is so little. 2. After reviewing the recent tracks from the new procedures, it appears the majority track to the West of the waypoint and inside the straight line. The FAA has stated a desire to keep flights over the Potomac river but this is not occurring. Anecdotally , the majority of flights I have witnessed are directly over the top of Rosslyn and Courthouse buildings. 3. Mr. Randolph Ales who wrote the original complaint is no longer the national director of the secret service. Has the FAA been in contact regarding recent incursions or lack thereof? Is this still a priority for the secret service? Has the FAA communicated the potential impact to communities vis-à-vis relatively few incursions? 4. Has the FAA considered reducing northbound departures to decrease the probability of incursions occurring. Obviously, the less flights that go North the less chance there will be of an incursion. 5. The FAA has not shared an investigation of incursions with the public. What caused these incursions? How severe were they? The track between ADAXE and REVGE is not a huge difference. Why would this have prevented previous incursions? 6. Why has the public not received flight tracks for 2019? How many incursions were in 2019 following the letter and before new procedures implemented? Has there been other recent changes (outside of flight path) that caused fewer incursions recently? It appears there were ZERO incursions in January when looking at all tracks <p>Many Arlington residents are frustrated the FAA is attempting to permanently implement this change without appropriate consideration of the relative benefits and drawbacks. Again, please delay implementation and explore other solutions.</p>	Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Need for the Proposed Actions.
88	It is impossible to sit in my garden in the summer and have a conversation as the noise is deafening from the planes dying above. Please stop this torture	Comment not directly relevant to the proposed project.

89	<p>In this time of Corona Virus, I am certain there are many pressing issues - but I wish to again express my concerns about the recent changes in flight paths and the heavy increased volume of planes to and from Reagan National Airport, as the virus has certainly and seemingly not changed flight volume or direction from DCA. It is widely understood that hearing airplanes in the DC area is a norm - however- this movement of airplanes away from the general path of the river, and over the tops of Arlington family homes, is disturbing, disruptive and downright unacceptable. The FAA and Secret Service's decision was poorly vetted, poorly worded and does not clarify how this change helps national security, and frankly, I don't buy it. Please give consideration to the countless Arlington residents impacted by this - our neighborhoods and the environment must be considered - this isn't necessary when the planes can easily stay over the river and greatly reduce the noise level - and is a fair balance for residents on both sides of the river. (The planes that fly over Arlington are much nearer to the CIA in Langley - how is that not a security concern?) I understand rules changed after 9/11 such that the hours for take off and landings was widely expanded - and the airlines, the FAA and National airport has certainly exploited this option.... Flights take off as early as 5;20 am and land at all hours of the evening. If these flight changes are allowed - it must be back under rules of no flights taking off before 7 am nor after 10pm, and no landings after 11pm. Additionally - I've heard studies that some 70 percent of flights come and go from the Arlington point of direction - why wouldn't more flights be directed to and from the south with the wide open Potomac river area? Again - a more reasonable split please? I beg of you to change these paths - your sincere consideration is appreciated.</p>	<p>Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Need for the Proposed Actions.</p>
90	<p>I would like to register my complaint about the the aircraft noise created by air traffic at Reagan National Airport. I understand the need for air traffic and the geographic distance from Rosslyn area in Arlington, VA, but would like to see it the traffic better balanced and not so loud, low, and frequent to the Rosslyn region.</p>	<p>Comment not directy relevant to the proposed project.</p>
91	<p>Population is particularly dense in Georgetown and nearby neighborhoods, and the ability to make improvements to reduce noise is limited by historic designations, so keeping air traffic as far away as possible, and as infrequent as possible, would be highly beneficial for these residents. Flights before 7 a.m. and after 9 p.m. represent specific hardship for residents on the flight path. I urge the FAA to consider reducing or eliminating such early/late departures from DCA, at least if they must take the river route. At these times there isn't much traffic to IAD, so asking folks to leave from IAD would not represent a severe hardship. Further, the proposed implementation of more advanced air traffic control systems may increase the number of take-off and landing, further burdening those who live in the neighborhood. I request publication of comments not include my name or address, unless the CEOs of the airlines are happy to share their home addresses with me!</p>	<p>Comment not directy relevant to the proposed project.</p>
92	<p>The noise from airplanes is almost unbearable. There is never any quiet. Planes start at early and end late. Please consider flying some other flight path.</p>	<p>Comment not directy relevant to the proposed project.</p>
93	<p>The noise over our house has gotten progressively worse over the years as aircraft with larger engines land at DCA and as they fly less over the center of the Potomac and closer to land before getting to Rosslyn and turning. This new takeoff path simply makes things worse for very little apparent gain. I don't see how this makes the WH and the monuments any safer, but it makes residents on both sides of the Potomac worse off. Therefore we oppose the change. I should also note that we have repeatedly requested that noise level check be conducted at the end of Fillmore Street in Arlington (the 2700 block) since the noise levels of planes landing has gotten worse. There used to be some way in which planes could reduce their noise levels, but this seems to go unheeded as loud planes land at midnight or later and then start again at 6am. We request that a noise meter be set up to monitor this situation. Having the noise monitored in Rosslyn is not sufficient. Monitoring our Woodmont residential area that is most affected would be a very low cost way to provide tangible data, and it is the responsible thing to do.</p>	<p>Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Need for the Proposed Actions.</p>
94	<p>The airplane noise in my yard has made it increasingly difficult to even be outside! Constant plane traffic takes all the enjoyment out of my backyard--I can't even talk on the phone without the constant interruption of airplane noise. PLEASE take Georgetown residents into consideration!</p>	<p>Comment not directy relevant to the proposed project.</p>
95	<p>I support the DC Fair Skies Coalition comment. I have lived at my current address in Georgetown since 2009, and can personally confirm that the aircraft noise level has risen substantially, especially with the flight path change, becoming a major intrusion into our lives. It starts early in the morning, often waking us up, and makes it much more difficult to enjoy even sitting in our yard. Even as I am writing this, sitting in my kitchen with the back door open, the noise of each passing plane is loud enough to make normal conversation difficult. The sounds come constantly, rattling our single pane windows and interfering with the quiet enjoyment of our home and property. It does not even stop long enough overnight to permit a full night of uninterrupted sleep. Any movement of the flight path or other steps that reduced this assault on our senses would be most welcome. Moreover, I would strongly urge that the path be moved back as close to where it was as possible.</p>	<p>Comment noted</p>
96	<p>My neighborhood and my residence are being hammered by the recent change in the take off and landing patterns at Reagan National Airport. Shifting the path south of the center line of the Potomac is detrimental to our health and well being. The noise is bad enough, but we are treated to a layer of fine toxic soot from each passing plane. It is not fair that the entire area receives the benefits of our urban airport while only the residents of North Arlington bear the brunt of the detriments. Please return the flight path to the river, where it has the least impact on the lives of the citizens.</p>	<p>Comment noted, refer to Topical Responses for Noise, Results of HOLTB, Air Quality, and Need for the Proposed Actions.</p>

97	I support the DC Fair Skies Coalition comment. I have lived at my current address in Georgetown since early 2009, and can personally confirm that the aircraft noise level has risen substantially, especially with the flight path change, becoming a major intrusion into our lives. When we first moved in, the planes' noise was at a level that did not interfere with our daily live. Now, my family cannot even get 8 hours of sleep free of noise. Aircrafts keep on flying until about 11pm every night, and I am woken up every day around 5:50am with the first aircraft. The sound is loud, and disturbing, even with the windows closed. We cannot sit in our backyard and enjoy some family time, and the conversation gets constantly interrupted by the loud noise. Even as I am writing this, sitting in my kitchen with the back door open, the noise is loud enough to make normal conversation difficult. The sounds come constantly, rattling our single pane windows and interfering with the quiet enjoyment of our home. Any movement of the flight path that reduced this assault on our senses would be most welcome.	Comment noted
98	I oppose the new 2016 flight traffic pattern. It creates unnecessary noise above the Georgetown neighborhood and decreases property value.	Comment not directly relevant to the proposed project.
99	COMMENT ON FAA PROPOSED IMPLEMENTATION OF AIRSPACE CHANGES AT RONALD REAGAN WASHINGTON NATIONAL AIRPORT (3/27/20) I am a homeowner in the Palisades neighborhood of NW DC and submitting this comments on the proposed change in the northbound departure flight path from National Airport (DCA). As a resident, I strongly support the proposal to move the flight path 784 feet west, which I hope will reduce some of the aircraft noise that the original LAZIR flight path produced. Notably, the 2015 flight change in the northbound resulted in substantial noise increase for my family home, which was built in the 1880s and sits on the Historic Registry with single plane windows; as the house is on the historic registry, I cannot modify the windows and the noise is extremely loud; on calls, regularly when planes fly overhead, as someone who often conducts work at home, I cannot hear what is being said on my conference calls even from inside my home; moreover, the sound from the planes has frequently woken me and my family members at night. Previous to the 2015 flight path change, we did not have this problem. I appreciate your consideration of my comments as a local DC constituent, and thank you for your consideration of concerns regarding noise.	Comment noted
100	I am a resident of the Palisades neighborhood in the District, and I strongly support the proposal to move the flight path 784 feet west to eliminate the unacceptable threat to the national security that the current flight path poses.. However, I urge the FAA to continue working with the DCA Community Working Group to reduce aircraft noise from both departing and arriving planes. I understand that planes approaching DCA from the north using conventional flight procedures such as RIVER VISUAL also pose a national security risk because of incursions into P-56. I urge the FAA to propose a solution requiring planes from the north to use advanced navigation equipment to eliminate this serious problem.	Comment noted
101	The noise from the flights has been disrupting my sleep, and disturbing my health for far too long...please do something to re-route these flights!!!	Comment noted
102	We support the recommended changes as a first step to address the problems created by the NextGen changes.	Comment noted
103	I fully support the D.C. Fair Skies Coalition's comments. As a longtime resident and property owner in Georgetown, their observations and analysis are accurate, and reflect the environmental, noise, historic preservation, and quality of life issues that I share -- in addition to the Secret Service's security concerns.	Comment noted
104	I am writing to support the proposed permanent westward move of the flight path for aircraft heading north from DCA. Since the flight path was moved eastward in 2015, the noise at our home in Georgetown has been excessive. When we're in residence, my wife is awakened by the first flights around 5:15 am. Our 160+ year-old wooden frame house does not screen the noise, and we are not allowed to replace our single-pane windows with double-pane ones. The national security risks of incursions into Zone P-56 are also a strong reason to move the flight path westward as proposed.	Comment noted
105	We have lived in this neighborhood (Foxhall village) for 30 years, since March 1990. In the first two decades there was no issue with aircraft noise and we could have outdoors conversations. However, the aircraft noise has gotten worse during the past years. From 5:30 AM onwards we have flights directly over our house, very low very noisy. This continues during the day into the night. As a consequence it has become impossible to have a conversation outside the house, as planes go overhead at frequent intervals, sometimes every five minutes - I timed that with my watch	Comment not directly relevant to the proposed project.
106	My family has been living in the Palisades DC for the past 10 years. We have observed a surge of air plane traffic above our head that has become a real nuisance for both our health and moral. The noise starts well before 6 am and stops well after midnight, with high peaks in between during which the noise from aircrafts flying above us is CONSTANT. It is impossible to have a conversation outside during these peaks.We urge the airport to reduce significantly its traffic if changing the path is not an option.	Comment not directly relevant to the proposed project.

107	I would like to register a complaint as a resident of Rosslyn in Arlington, VA. The additional noise from airplanes makes it impossible to sit outside, as it is almost deafening at times. Please consider changing the flightpath so that it is not directly over Rosslyn and adding additional noise to the already very loud noise from planes.	Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Need for the Proposed Actions.
108	I am writing to oppose the "new" air traffic route from Reagan National Airport. In 1993 I bought my first home in the Cherrydale neighborhood of Arlington, VA. A couple years ago we sold the house and bought another house in the Rock Spring neighborhood I am saddened by the low flying planes over Military Road and the noise levels from 5:30 AM until midnight can be unbearable. The current takeoff flight path has planes arching over Rosslyn, the water treatment plant in Maryland and then turning hard left over Potomac Regional Park in Virginia. This is followed by another turn back over the Potomac River. The landing route is similar and over Potomac Regional Park and down through Rosslyn. The solution seems simple. Restore the flight path down the middle of the Potomac River!	Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Need for the Proposed Actions.
109	We have lived in our home since 1986. Never have we heard so many planes overhead in all these years. In addition, military helicopters fly directly over our home nearly every day, and several times each the day. The walls vibrate and the noise is sooooo annoying. I realize that we live between the Pentagon and the CIA, but this is absolutely ridiculous!! Who is directing these flights? Why are we American citizens being ignored like this? Why aren't pilots using the flight pattern of the Potomac River? Let's use some common sense, folks!	Comment not directly relevant to the proposed project.
110	As an owner of property and future resident of the Court House neighborhood In Arlington County I am very concerned about the noise impacts of this proposed change. Please reconsider this decision and allow time for the recently procured independent study commissioned by Arlington and Montgomery Counties to yield other options.	Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Need for the Proposed Actions.
111	The airplane noise has affected my sleep for years. Why are planes taking off/landing before 6am? It's interruptive to our peace in the night. I cannot believe it even happens when construction cannot take place in the middle of the night. During the evening, we must turn up the tv when an airplane passes by so we can hear. The sleep, however, is the biggest reason I demand change.	Comment not directly relevant to the proposed project.
112	Regarding the noise from flights around National Airport in Arlington, VA. I can speak of when I visit my brother's family in North Arlington. Their house is not new (perhaps 40+ years old), they are on N. Oxford which backs up to Overlook Park. It is impossible to be outside and have a conversation during the summer. The planes every couple minutes are so low and so loud it is ridiculous. And I understand, not necessary if they stay over the river as they are apparently supposed to do. Are they varying from their stated flight plan? Are they permitted to take a short cut over houses, parks, businesses, schools etc in N. Arlington? With the expansion of the airport will there be MORE planes and will they then be coming over S. Arlington where I live? We get a low flying helicopter every day now; adding airplane noise from that height would be unacceptable. If it is too crowded to stay on their directed course now, will all of Arlington and Montgomery County be the airport's approach zone? Can the FAA approve that? May I respectfully suggest that the legislators who want to fly west go to Dulles like the rest of us do.	Comment not directly relevant to the proposed project.
113	This morning I was ripped out of my sleep at 6:06 by the loud noise of an overflying airplane that took off from Reagan National Airport flying South. I also cannot go back to sleep because every few minutes another loud noise making plane flies over the house.	Comment not directly relevant to the proposed project.
114	When we moved into our neighborhood in 2002, we knew that airplanes flew over our home. Sometimes we were amazed that we could read all the lettering on the plane. And when we were outside, we learned to stop speaking until the noise from the plane had abated. No big deal. It was what we knew would happen if we moved into this neighborhood. But we did not think that the flight paths would change. And more planes would interrupt our talking when we were outside. But now we are also hearing the planes when we are INSIDE our homes. I know when National Airport opens for business at 6:00 am because the planes wake me a little before 6:00 on their approaches to the airport. I'm surprised at how many planes arrive so early. So my sleep pattern is now changed/changing. But not in a way that I like and it shouldn't change because of noise entering my home. So please consider that the prior flight plan, while it did interrupt our living at times, was the one we signed on for. It's the one that was a factor when we purchased our (to me, expensive) home, and there should not be a need to change it. Please go back to the old flight plan.	Comment not directly relevant to the proposed project.

115	I am writing to complain about aircraft noise from DCA which has increased significantly since we purchased our home fifteen years ago. Our home is located in the Aurora Hills neighborhood of Arlington. We frequently hear aircraft engines very early in the morning--often as early as 5:30 or 5:45 am. Most concerning is the change in flight patterns resulting in significantly increases noise from aircraft overhead. For most of the 15 years we have lived here we noticed very little problem with noise. Now, however, we often have aircraft flying very low directly over my house. I actually cannot understand how this is possible since we are located due west of the middle of the runway, which runs perpendicular to us. But many times I have been in my back yard, heard a deafening noise, and seen aircraft flying at low altitude directly overhead, to the point where I can look up and read the letters on the underbelly of the aircraft. I urge you to take steps to address this nuisance, which impacts our quality of life and creates a hardship for the area.	Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Need for the Proposed Actions.
116	I wish to formally convey my disagreement and frustration with the recent changes to flight patterns out of DCA. What had historically just been considered "background noise", the new flight patterns are highly disruptive and startling - oftentimes making one feel as though the plane could be on a crash course directly for one's home. The change from prior patterns is epic, I'm truly startled that such a change could be implemented that negatively impacts so many residents, families, children and pets. Watching the flights on the noise monitoring website, the spikes of some aircraft as they pass directly over the Lyon Village neighborhood are extraordinary. I urge you to reconsider these changes for the good of the community.	Comment noted, refer to Topical Responses for Noise, Results of HOLTB, and Need for the Proposed Actions.
117	Since there is significantly less air traffic at DCA airport, this study will be invalid. I have registered several complaints in early March. And now, there are no flyovers or noise - due to the Coronavirus19. Please consider what alternatives to the existing contract can be undertaken to adjust the contract to ensure that study will be meaningful and effective.	Comment noted, refer to Topical Responses for Noise.
118	The DCA approach and departure changes have adversely affected the amount of noise heard at our property in Arlington, Virginia. The noise is greater now than before. The airplanes appear to be flying in a line closer to our house, and occasionally, over it. Please change the approach/departure lines to take this increased noise into account.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.

119	<p>The State of Maryland has reviewed the FAA’s materials regarding the “National Security Request – Amended Waypoint for DCA North-flow SIDS / P56” project as posted at https://www.faa.gov/air_traffic/community_involvement/dca_p56/. Included in the review of these materials was a review of the HOLT B Standard Instrument Departure (SID) at Ronald Regan National Airport (DCA) associated with an ongoing air traffic test and associated changes to waypoints included in the HOLT B procedure that may be made permanent. As noted by the FAA, these changes if made permanent will also be included in future revisions to the DCA HORTO, CLTCH, JDUBB, SOOKI, DOCTR, REBLL, WYNGS, SCRAM, and AMEEE SIDs. As part of the State’s review of the DCA HOLT B SID, the State reviewed the FAA’s Categorical Exclusion (CATEX) and noise screening analysis associated with the procedure . Appendix A within Attachment B of the CATEX shows the changes to the HOLT B SID at the navigational points REVGE and BEBLE. This is consistent with the text explaining the FAAs proposed procedure changes and current ongoing air traffic test. However, the Appendix also shows additional potential procedure changes that would occur as aircraft follow the Potomac River beyond BEBLE and turn to the west at a new navigational point, WP23551, near the communities of Glen Echo in Maryland and Langley in Virginia. This proposed change is not specified or referenced in the CATEX text. It is also not clear if the results of the noise screening analysis as detailed in Attachment B of the CATEX reflect these additional proposed procedure changes. Since the additional potential proposed procedure changes related to the DCA HOLT B SID as depicted in Appendix A within CATEX Attachment B would occur over areas of Maryland, and specifically Montgomery County, the State submits the following specific comments and requests for clarification regarding the scope of analysis in the CATEX: • Were the proposed procure changes beyond the BEBLE navigational point as depicted in in Appendix A within CATEX Attachment B modeled as part of the noise screening Federal Aviation Administration Page Two analysis? If not, the State requests that the FAA revise the noise screening analysis to include those proposed procedure changes, make the results available for comment, and extend to comment period to allow for public review and comment on the results of that noise screening. • If the FAA proposes to make the changes to DCA HOLT B SID permanent and include these changes with future amendments to the DCA HORTO, CLTCH, JDUBB, SOOKI, DOCTR, REBLL, WYNGS, SCRAM, and AMEEE SIDs, will these permanent changes include the additional proposed procedure changes beyond the BEBLE navigational point as depicted in in Appendix A within CATEX Attachment B? If so, the State requests that the FAA prepare an environmental assessment evaluating the environmental impact of the proposed procedure changes, as required by the National Environmental Policy Act, and perform the review and analysis required by Section 4(f) of the Transportation Act and Section 106 of the National Historic Preservation Act. • As the FAA is aware, past changes in DCA flight procedures that moved flight paths closer to or over residential , historic, and recreational areas, or that concentrated flight paths over residential, historic, and recreational areas have been highly controversial on environmental grounds because the FAA’s screening analysis did not fully account for the impact of increased flight operations on the human environment and on historic and recreational resources. Further, those impacts are themselves significant and require analysis under federal law. As the DC Circuit noted in discussing the FAA’s adoption of new flight procedures at DCA, “the FAA’s efforts . . . were hardly a model of sound agency practice” and “the FAA appears to have given short shrift to the required environmental analyses.” Maryland requests that if implementation of DCA HOLT B SID (or any other future changes to DCA flight procedures) will also require or lead to implementation of further changes to flight procedures over Maryland residents and historic and recreational resources, that those changes be subject to an environmental review and other analysis pursuant NEPA, Section 4(f), and the NHPA. The State of Maryland greatly appreciates the opportunity to review and comment on the proposed changes to DCA flight procedures. The State also appreciates the FAA’s efforts to inform organizations which have previously expressed concern over the impact of noise from DCA flights on Maryland residents and resources of the proposed changes. These organizations include Quiet Skies Montgomery County, the Maryland Department of Natural Resources, the Reagan National Community Noise Working Group, and Montgomery County, Maryland. I have copied those</p>	<p>Comment noted, refer to Topical Responses for Noise, Results of HOLT B, Level of Environmental Review, Section 106, and Need for the Proposed Actions.</p>
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120	<p>COMMENTS ON FAA PROPOSED IMPLEMENTATION OF AIRSPACE CHANGES AT RONALD REAGAN WASHINGTON NATIONAL AIRPORT The DC Fair Skies Coalition submits these comments on the proposed change in the northbound departure flight path from National Airport (DCA). As the FAA is fully aware from the Petition filed by the Coalition, the Mayor of the District of Columbia, and DC Council Members dated May 27, 2016 and the Petition for review filed with the US Court of Appeals for the DC Circuit in 2015 the Coalition strongly objected to the change the FAA made in the northbound flight path in 2015. It significantly increased noise over Northwest DC and was based on a flawed Environmental Assessment which the FAA conducted without notice to the public or the elected officials of the DC Government. Moving the historic flight path over Virginia to the east side of the Potomac River not only significantly increased aircraft noise for the residents of DC along the river from Georgetown to Palisades, it also resulted in incursions of aircraft into the Prohibited Zone (P-56) that includes the White House, the National Mall, and Congress. Accordingly the Coalition strongly supports the proposal to move the flight path 784 feet west to eliminate the unacceptable threat to the national security that the current flight path poses. It should also reduce somewhat the increase in aircraft noise that the original LAZIR flight path produced. The proposal not only moves the flight path west it also requires planes to turn left nearer the airport and fly in a straight line north which will reduce the number of turns required by the current procedure. That in turn should enable planes to climb faster and reduce noise on both sides of the river. While the reduction in aircraft noise may be modest, as the FAA's noise screen suggests, it is certainly a factor that the FAA should take into account in its environmental assessment of this proposal. A related consideration is that Georgetown and nearby communities and schools are characterized by buildings built in the 18th-early 20th centuries before there was a National Airport. As a result they are much less resistant to aircraft noise than more modern buildings. Indeed the US Commission of Fine Arts which has jurisdiction over exterior alterations in Georgetown has ruled that existing single pane windows should be restored if possible and replaced with identical single pane windows if necessary. Double pane windows are not acceptable. The DC Airplane Noise Assessment (September 2018) found that aircraft noise in DC's historic neighborhoods was increased as a result of the eastward shift in the flight path. It also found that learning in DC schools was being negatively affected by aircraft noise and that nighttime noise levels inside of northwest DC residences were high enough to awaken between 12- 33% of the population. Ronald Reagan Washington National Airport Airplane Noise Assessment, p.135. The Coalition also supports the flight path change because the existing track results in significant aircraft generated pollution which is contributing to the deterioration of the monumental buildings on the National Mall including the Capital. We understand that the Architect of the Capital endorsed the FAA's earlier LAZIR B proposal because it would reduce air pollution. The current proposed shift in flight path should produce a similar beneficial impact. We urge the FAA to consider this issue in its environmental assessment of the proposed change. Because the Proposal is based on national security considerations and the anticipated environmental impacts on DC are a reduction in noise and pollution we support the Proposal. However we urge the FAA to continue working with the DCA Community Working Group to reduce aircraft noise from both departing and arriving planes. We understand that planes approaching DCA from the north using conventional flight procedures such as RIVER VISUAL also pose a national security risk because of incursions into P-56. We urge the FAA to propose a solution requiring planes from the north to use advanced navigation equipment to eliminate this serious problem. We appreciate your consideration of our comments on this matter. Ed Solomon Chairman, DC Fair Skies Coalition Richard Hinds Counsel, Ward Two Representative to Ronald Reagan National Airport Community Working Group Ken Buckley Ward Three Representative to Ronald Reagan National Airport Community Working Group On Behalf of Burleith Citizens Association, Citizens Association of Georgetown, Hillandale Homeowners Association, Foxhall Citizens Association, Colony Hill Neighborhood Association, Palisades Citizens Association, and Georgetown University March 25, 2020</p>	Comment noted, refer to Topical Responses for Noise and Level of Environmental Review.
121	<p>Thank you for the opportunity to comment on the significant aircraft noise in/out of DCA Airport. Our home is in Arlington/Rosslyn area. We have lived here for almost 23 years and the number of flights has significantly increased over the years at DCA. Thus, aircraft noise has continued to increase year after year until now it seems to be almost 24/7 with commercial aircraft taking off and landing, flying directly over Rosslyn. The aircraft noise awakens us around 5:30 am (sometimes earlier) and doesn't stop until sometime after 1-2 am. It is difficult to get to sleep at night. When we do manage to sleep, we are awakened multiple times in the night with extremely loud airplane noise. The constant noise interferes with daily activities such as sitting outdoors on the patio or having a conversation while outdoors. Changes in flight patterns for take off and landings to/from DCA and the relentless aircraft noise causes a substantial negative impact on quality of life. We realize there is no curfew on DCA airport operations but the high demand for early morning and late evening flights as well as the rest of the day has resulted in non-stop aircraft noise. Please take into consideration the negative impact that the aircraft noise causes on quality of life for the citizens on the direct flight path. We respectfully submit these comments and ask that the FAA and others roll back the most recent changes in flight paths and mitigate airplane noise in general.</p>	Comment noted, refer to Topical Responses for Noise, Results of HOLTB, Level of Environmental Review, and Need for the Proposed Actions.
122	<p>The flight path change has disrupted my quality of life. It is causing emotional as well as physical distress to me, my family, as well as the community of Lyon Village. I'm sure it is negatively impacting the environmental as well. Physically, my home vibrates as a result. The aircraft is too loud and too constant. Please revert to the former flight path.</p>	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.

123	I live at xxxx North, Arlington, VA 22201 and am contacting you to submit an aircraft noise complaint regarding operations at Reagan National Airport. Under the NextGen system, the noise from DCA operations, especially in north flow mode, is continuous and disruptive. We live near to MWAA Noise Monitor #7 at 2220 North Rolfe Street, Arlington, VA 22201 which regularly reports noise events of 74 db-A. However, my readings at our nearby location reach 76 db-A daily, and often higher. Flights departing DCA before 6:00 am, such as American 2866 to Dallas/Fort Worth and American 1865 to Charlotte, operated with Boeing 737-800s, are particularly disruptive to sleep. This disruption has continued despite the installation of double-pane laminated glass windows. In south flow mode, aircraft hug the Virginia coast rather than operating over the Potomac River and regularly overfly our North Highlands neighborhood at low altitude. I urge you take whatever steps are necessary to minimize or eliminate these noise events. Please give consideration to: (1) enhancements allowing south flow operations to occur more often and for longer periods; (2) requiring aircraft in south flow arrivals to remain centered over the Potomac River; (3) increasing fines for noise violations so that they act as an effective deterrent rather than as a mere “cost of doing business;” (4) more rigorous enforcement of the 10 db-A noise differential status for early morning and late night flights; (5) mandating use of quieter aircraft, such as regional jets, for early morning and late night flights; and (6) avoiding extended clusters of take-offs of larger aircraft by mandating spacing with regional jet take-offs to reduce periods of concentrated noise events. Please let me know if I can provide you with additional information to assist in understanding and mitigating the serious aircraft noise events affecting our neighborhood.	Comment not directly relevant to the proposed project.
124	I am in favor of the proposed changes as far as I understand them. I think it is important to keep planes away from restricted airspace. I think that arrivals need to be included as well, however, as I often see planes gliding in well north of the river. Is there any reason why planes cannot go back to flying over the river when weather permits?	Comment noted
125	Moving the flight path south of the river is only the most recent betrayal of the citizens of North Arlington. Time limits (7am - 11pm) were blown away. Aircraft flight distance (and therefore size and therefore noise) was increased. And now after years of study and months of community involvement we are supposed to believe that the centerline of the Potomac is no longer safe for the White House. Not credible! Please, do not impose this nuisance and health hazard on your own citizens. Noise disturbance has become our daily life. We live in Bellevue Forest and airplanes are flying right over our roof starting at 5:45 am and until well past midnight. This is particularly disturbing when airplanes are flying South in preparation for their landing to DCA which lately seems to be an increasing percentage of the time. In addition to the noise, this air traffic creates a dangerous pollution and our deck is covered by a black oily tar coming from the exhaust of the airplanes. This is potentially very dangerous for our health and this is FAA's responsibility and eventually FAA's liability. FAA, you are a shame for our country. 346 human lives were lost because of your negligence and incompetence. You have certified systems that you do not even understand. You are the laughing stock of the aviation regulators around the world. They will no longer accept certifications from the FAA and will do their own due diligence. You are just a waste of taxpayer's money and everything you do is wrong and harmful. Most of the FAA management should be fired.	Comment noted, refer to Topical Responses for Noise, Results of HOLT, Level of Environmental Review, and Need for the Proposed Actions.
126	I am a resident of Rosslyn, VA. I would like to continue to be a Rosslyn resident, but an increase in the flight noise and the jet fuel residue on my balcony many drive me out of my home. I cannot see any clear reason to move the flight path from over the river where there are few people to a residential area. I am also concerned that you, FAA, have agreed to taller buildings in Rosslyn and it was already dangerous in the one engine scenario. There would be an increase risk to many people in this new flight path in any crises situation.	Comment not directly relevant to the proposed project.
127	I am writing to object to DCA HOLT procedure for myself and my other six family members who live in Arlington. As both a commercial pilot and US Air Force fighter pilot with nearly thirty years of flight experience I can speak with more authority than most when I say the HOLT procedure accomplishes nothing in terms of making the United States, the National Mall, or the White House more safe. Assuming the departing air traffic is going 200 kts the addition 784 feet will only afford concerned parties an additional 2-3 seconds of reaction time to avoid P56 incursions. What the change does do is measurably degrade the quality of life of tens of thousands of people who live and work in Arlington, VA. The degradation in the quality of life comes from excessive and unnecessary jet noise that is ever present nearly all hours of the day. This noise can often be heard and felt inside my home, and the homes of all my neighbors. It is clear to me that whomever initiated the request does not have a baseline understanding of airmanship or air defenses, and a complete disregard for the citizens that will potentially forever be burdened by this change. Further, it is also troubling that the FAA which is supposed to be both knowledgeable in the management of departure procedures and impartial arbiter would advance such a ill-conceived change.	Comment noted, refer to Topical Responses for Noise, Results of HOLT, Level of Environmental Review, and Need for the Proposed Actions.
128	Directly overhead— now another one has gone over —it’s not even 6am yet!!! Curfew and old route over river please	Comment not directly relevant to the proposed project.

129	<p>I live in the Radnor Heights neighborhood of Arlington, Va., right under or adjacent to the flight path of many planes leaving north from Ronald Reagan National Airport. I have been in the neighborhood since 1978, at which time the airport was closed from 11 p.m. to 7 a.m. Later, Congress lifted restrictions at DCA, allowing earlier departures and later arrivals by so-called “quiet planes”, some of which, I can attest, are not very quiet. I sometimes call the Noise Information Office at DCA to complain. But, complaining is a tiresome, frustrating, and seemingly unproductive exercise, therefore, the number of complaints I have made does not reflect the number of times I have been awakened by aircraft noise. For example, during a couple of mornings in February, when awakened around 5:20 a.m., I decided to record the take-offs. During the next hour or so, I wrote down every time I heard a plane took off. For a period of about 30 minutes, I made a mark about every two minutes. Now, I realize why it was unusually noisy at that time: I was hearing the concentration of noise from the trial period in this matter. Accordingly, I now regret not having taken the time to complain to the noise office. Based on more than 40 years of listening to planes fly in and out of National, I can tell you what your “criteria” and machines failed to capture: the noise was significantly GREATER and IRRITATING during the test period, I presume because the flights are more concentrated in a narrow area. It may not have been a “reportable” increase according to your definitions, but according to my ears and brain, it was an increase. As to the matter of impact on historically significant resources: what about Arlington Cemetery, immediately adjacent to my apartment? Out my windows, I see two hillsides covered with grave markers. Members of the public come to the Cemetery to honor the dead, which in this area includes civilians killed in the Civil War; to attend ceremonies at the Tomb of the Unknown Soldier; and in some cases, to attend the burial of their own family members. I can only imagine that the relentless and concentrated noise of commercial aircraft skirting right along the edge of or directly over the cemetery will be an even greater annoyance to those seeking a contemplative mood in honor of the memories of those interred in Arlington Cemetery. And, what about the grounds of the Iwo Jima Memorial, another historically significant resource, which is right under the path? Judging from the large number of tourists, including Marines and veterans, that I witness visiting the U.S. Marine Memorial every year, it seems to me that concentrating aircraft traffic and noise over that area would also further intrude upon the contemplative experience of those visiting the memorial. From my personal experience, when I walk by the memorial and a plane flies low and close, the noise distracts my attention from the memorial to look at the airplane instead. I recognize that the U.S. Secret Service has requested this change. But, the pilots who fly in and out of National are clearly skilled enough to handle the challenges of doing so. I suspect that if a pilot with malicious intent sought to crash the plane into the White House, a modified departure pattern wouldn’t really deter him or her. If you would return the hours at DCA to closing from 11 p.m. to 7 a.m., this change would be more tolerable. But, concentrating even more “wake-up” flights to within the same narrow route (some even in the middle of the night) is not good for the health and well being of the residents who live in the area. I hope that you will not do so.</p>	<p>Comment noted, refer to Topical Responses for Noise, Results of HOLTB, Level of Environmental Review, Section 106, and Need for the Proposed Actions.</p>
130	<p>The HOLTB change proposal is poorly worded and doesn't really explain the necessity of the change. But it does seem certain to give those of us who live in North Arlington more noise pollution which the FAA refuses to address in a constructive manner. The FAA needs to better explain how much more noise pollution we will be expected to bear with this change, and why they cannot spread the pain by using a shotgun or other takeoff scheme for the increasingly noisy air traffic taking off from Reagan.</p>	<p>Comment noted, refer to Topical Responses for Noise.</p>
131	<p>Over the last month or two we’ve been experiencing an increased amount of noise from planes flying over our house at xxxFranklin Street 22306. Has there been a change in the direction planes take off and land? Most of the noise seems to be during landing. The planes are very annoying even if we’re inside.</p>	<p>Comment not directly relevant to the proposed project.</p>
132	<p>As planes discontinue service at DCA during the Covid-19 the remaining planes landing and taking off should use pathways out of DCA which reduce the noise level over Alexandria and communities south to the Woodrow Wilson Bridge. I live at Rivergate Place along the Potomac River south of the airport and the noise from aircraft is louder than it needs to be. It is really hard to understand why South bound planes taking off from DCA or landing from the South to DCA can not fly over the middle of the Potomac and give more distance to the communities on the riverbanks. Once over the WW Bridge and at a greater altitude the planes can make their turns. I can understand how North bound flights need to avoid the DC capital area airspace - but to the South it should be OK for the flights to travel in the middle of the Potomac. Please do not implement the temporary changes. Give the communities more space and keep them quieter.</p>	<p>Comment noted, refer to Topical Responses for Noise and Impact of COVID-19.</p>
133	<p>Thank you for the opportunity to comment on the significant aircraft noise in/out of DCA Airport. Our home is in Arlington/Rosslyn area. We have lived here for 4 years and the number of flights has significantly increased at DCA. Thus, aircraft noise has continued to increase year after year until now it seems to be almost 24/7 with commercial aircraft taking off and landing, flying directly over Rosslyn. The aircraft noise starts at around 5:30 am (sometimes earlier) and doesn't stop until sometime after 1-2 am. It is difficult to get to sleep at night. Changes in flight patterns for take off and landings to/from DCA and the relentless aircraft noise causes a substantial negative impact on quality of life. We realize there is no curfew on DCA airport operations but the high demand for early morning and late evening flights as well as the rest of the day has resulted in non-stop aircraft noise. Please take into consideration the negative impact that the aircraft noise causes on quality of life for the citizens on the direct flight path. We respectfully submit these comments and ask that the FAA and others roll back the most recent changes in flight paths and mitigate airplane noise in general.</p>	<p>Comment not directly relevant to the proposed project.</p>

134	On Friday, March 20, at 5 and again at 6 am planes flew over low this neighborhood in North Arlington. As this is not a normal occurrence, I want to report these flights over heavily populated residential areas, including Ballston. At a time when there are many fewer flights departing/arriving at DCA, I would hope that these (noisy) flights do not reflect a new flight pattern.	Comment not directly relevant to the proposed project.
135	This is in response to the increased airplane noise that has resulted in the change of the flight pattern as the planes take off from DCA in any given morning. Because they are no longer required to fly along the river and take off and veer in any direction once they get air, they fly right above the 22305 neighborhood where even shut windows and ear plugs do not have an effect. As soon as I can get out of my lease I will. Though there is an assumption that people will fill in for Amazon HQ2, so I doubt there will be much attention paid to current residents. I just wanted to post my opinions since I've been quite pissed off being woken up most mornings since December 2019.	Comment not directly relevant to the proposed project.
136	The planes don't follow the river and are frequently overhead in Arlington. Takeoffs are particularly noisy especially early in the morning.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
137	The increase in traffic over the suburban area with the new takeoff procedure is unnecessary and detrimental to the community. It is a large increase in noise pollution to a residential area without the studies needed to determine impacts to the community. Once AGAIN the FAA has not done their job of being a federal agency that is meant to advocate for the good of all community and not for the airlines.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
138	I am writing this to let you know that the flights that went over the Groveton area from Reagan at 11:07 am on 3/21, was excessively loud.	Comment not directly relevant to the proposed project.
139	The new temporary change in take-off procedures to the north from DCA has resulted in unbearable noise at my house. Even with the windows closed, the aircraft noise wakes me up in the morning starting around 6:00 a.m. Our use of our outdoor space is also impacted. Conversations must be halted while planes go overhead. My husband and I have lived here for over 19 years and have never experienced such noise pollution. Please do not implement these changes permanently. The noise is impacting our quality of life daily. Thank you. Please redact our personal identifying information.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
140	Since the new flight paths were implemented, I have noticed an increase in the noise levels from the planes. I am not able to measure the increase, but it is noticeable, especially in the mornings. But what's more concerning is the potential risk to those of us on the ground. On at least three occasions that I have noticed since the new flight paths were implemented, planes have taken very unusual routes over my neighborhood, which were quite alarming and loud and made my house rattle. (No, these were not flyovers from Arlington Cemetery.) Before the new flight paths are made permanent, I would like a review not only of the actual noise impacts, but also the safety impacts to those of us on the ground. If planes are now having to take unplanned paths over populated neighborhoods, how often are they doing it, why are they doing it, and what would be the impact if one of those planes crashed? Also, I would like to know if the new flight paths decreased the number of air space incursions reported by the Secret Service. If they experienced 300 incursions between 2012 and 2019 (eight years), this results in only 3 incursions per month. Did those incursions occur over populated areas? What number does the Secret Service consider an acceptable improvement - zero incursions? I want to ensure we are not trading fewer incursions over an unpopulated area for more incursions (and routine flight paths) over populated ones.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.

141	<p>Aircraft noise over the neighborhoods bordering on the Virginia side of the Potomac River has increased dramatically over the last 2-3 years. The proposed HOLT B Departure with the move of ADAXE 784' to the southwest must also include a move of Point BEBLE 784' to the Northeast. If this corresponding move is not included, aircraft departing on the revised HOLT B Departure will fly west of the Potomac River and over heavily populated areas on the Virginia side. While the proposed departure will pose some additional noise exposure, by far the dominating issue is the noise created by arriving aircraft. Aircraft landing to the South at Regan National Airport can and should be held to a course over the Potomac River. Currently, approaching aircraft constantly deviate unnecessarily to the west of the river (Point BEBLE) thus over Virginia Neighborhoods causing continuous, disturbing and dangerous conditions to me, my family and the other residents of Bellevue Forest, Potomac Overlook Park and other neighborhoods on the Virginia side of the Potomac River. Aircraft fly at low altitude, in landing configuration and at high power settings. Immediately after passing over our house (3800 30th Street North, Arlington) approaching aircraft then begin a left hand turn to re-intercept the approach course over the River (ADAXE). Aircraft having to execute the subsequent right turn at ADAXE back to a course following the river pose a greater threat to violating Restricted Airspace P-56A than executing a consistent track following the river. I and my family have lived in Bellevue Forrest since January, 1990. Never has aircraft noise been as constant, disturbing and detrimental to our wellbeing. Over the last 2-3 years aircraft approaching Regan National to the south have been allowed to deviate well right of course (BEBLE) causing them to fly over densely populated and established neighborhoods. Aircraft approaches and noise begin before 6 am and continue well into the night, many nights after midnight. Aircraft flying over our neighborhood are established in landing configuration, flying at low altitude and requiring high and excessively noisy power settings. Until this flight deviation was initiated, Aircraft maintained a course over the Potomac River and thus caused significantly less disturbance to families and people living in the neighborhoods bordering on the Virginia side. With the advancement of today's navigation capabilities, including GPS, aircraft approaching DCA should be required to maintain an approach course over the least populated areas which is over the river. The current noise and disruption must be addressed for the residents that are severely affected by this approach procedure. This situation could be solved by requiring approaching aircraft to maintain a course over the Potomac River from the Cabin John/American Legion Bridge to BEBLE (If Moved 784' Northeast) to REVG E until intercepting the final approach course for Regan National. Aircraft flying a course over the river would still be positioned to approach National safely, avoid the restricted area over Washington and would resolve the current noise issues for Neighborhoods bordering on both sides of the Potomac.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLT B.</p>
142	<p>I have lived and worked in Arlington County Virginia since 1992 and enjoy the convenience of being close to the federal government, where I have worked, and Reagan National Airport. The location to the airport has been a huge blessing, especially after returning from 28 hours of overseas travel. I wanted to bring your attention to a serious quality of life and safety issue that is getting worse. Since the FAA has changed the flight patterns by moving them closer to Arlington, both the noise has increased to the point that I have been woken up in later or early hours by the jet noise. Aside from being a nuisance, this is a health hazard as jet fuel and its fumes is highly toxic and should be kept as far from human beings as possible (Learmount, 2010). There has been an enormous ("REP. GARAMENDI AND SEN. BLUMENTHAL INTRODUCE BILL TO PROTECT AIRLINE PASSENGERS AND CREW FROM TOXIC JET FUMES," 2019) focus on the negative health effects of jet fumes on human beings and for this reason I request that you move the flight paths so they are equidistant between the populations of Washington, DC, Arlington County Virginia, and Maryland. Please reply with your stated intentions and plan for correction.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, Air Quality, and Results of HOLT B.</p>
143	<p>More flights directly overhead since early this morning</p>	<p>Comment not directly relevant to the proposed project.</p>
144	<p>Woke me up — it's midnight</p>	<p>Comment not directly relevant to the proposed project.</p>
145	<p>Airplane noise is significant over my house. The plane noise is almost constant (every minute or less at certain times of the day). Because the planes are so low (given that I am 10 miles from DCA), and they are accelerating, they are very loud. If the planes were required to stay over the river until they had reached a certain height and accelerated to their final speed, the noise could be reduced. Further, there are less populated areas farther up the river.</p>	<p>Comment noted, refer to the general comments sections regarding noise analysis.</p>
146	<p>Trying to sit outside but noisy planes going over, one after another</p>	<p>Comment not directly relevant to the proposed project.</p>
147	<p>Moving the flight path south of the river is only the most recent betrayal of the citizens of North Arlington. Time limits (7am - 11pm) were blown away. Aircraft flight distance (and therefore size and therefore noise) was increased. And now after years of study and months of community involvement we are supposed to believe that the centerline of the Potomac is no longer safe. Not credible! Please, do not impose this nuisance and health hazard on your own citizens.</p>	<p>Comment noted, refer to the general comments sections regarding noise and environmental analysis.</p>

148	Regarding the new/proposed departure procedures that place jet departures over land in Arlington, Va, I'm sure the developers of the new condominiums and apartments proposed by the Key bridge Marriott will be thrilled to see the planes flying directly overhead and hear the noise of those aircraft being so close to the buildings. I'm also sure that any potential renters or owners in those buildings (or the new buildings proposed for the Holiday Inn site across the street) will also be thrilled at the thought of the noise from the jets and seeing aircraft so close to their homes. Will the jet noise cause cracks and defects in the buildings/construction? Do the EIS and/or EAS address these issues? Or have they (EIS EAS) even been done? Put the planes back in the middle of the river where they had been for years.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
149	Again, loud enough to disturb inside my home with the windows shut. Please help us with this recurring problem. This never happened in the past before the flight patterns were changed.	Comment noted, refer to Topical Responses for Noise.
150	The new routing significantly increases the Jet aircraft departure noise over our Virginia homes for NO JUSTIFIABLE reason at all (has an EIS or EAS been done? Is one required?). The aircraft should be over the middle of the river (or the middle of Key Bridge) instead of over land on the Virginia side of the river. For years, DC, Va, and Md have shared the noise from the aircraft. For some unjustifiable reason, the DOT/FAA/Secret Service wants Virginia to have all of the jet noise. Again, for no justifiable reason. DCA operates approximately 310,000 flights per year at DCA. There were approximately 35 P-56 violations in 2018 (or 2019). So, 99.9999% of the aircraft DO NOT ENTER P-56. They were accidental/unintentional. violations. ALL air carrier/private PILOTS flying into or out of DCA are screened! They have to meet certain criteria. And pilots/Air carriers are / can be fined for violating P-56. To the best of my knowledge, there was only 1 (one) intentional violation and that was from a postal worker flying a homemade helicopter onto the capitol grounds. There may have been some from private aircraft from the local small air fields. So, to put it bluntly, if a jet pilot departing DCA wanted to intentionally fly into P-56, I'd say that there is very little that could be done to stop the aircraft from entering P-56. How far it would get into P-56 is a different matter and topic altogether. So, why not put the departure point back in the middle of the river and allow the Virginia residents to go back to "the peace" of the old noise level, less air pollution level (from jet exhaust), and freedom from worry that we had. That, I think most could live with, as I, for one, do not want to see DCA closed.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
151	The flights are already very loud when they go directly over my building. Rosslyn already has problems with wind corridors. The flight path should be kept over the river and the existing flight path that does pass over part of Rosslyn should be moved over the river as well.	Comment noted, refer to Topical Responses for Noise.
152	: I am concerned about the change in the DCA traffic pattern. The new pattern has resulted in aircraft flying directly over several natural park areas - Potomac Overlook Park, Windy Run Park for example. There was no environmental impact study done, no public input, no local government input.	Comment noted, refer to Topical Responses for Noise and Section 106.
153	The comment period must be extended beyond March 30, 2020	Comment noted, refer to Topical Responses for Impact of COVID-19.
154	The new flight plan has been incredibly disruptive. I need to keep my windows open to keep my house comfortable during spring and I'm constantly having to pause conversations, interrupt my morning sleep, or interrupt my concentration while working from home. The plan was committed to and announced haphazardly and it's affecting many residents while likely making an imperceptible impact on national security. Please reconsider.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
155	Helicopter just flew over our house at 11:36 pm on March 17, 2020. Woke me up. Will take over an hour to return to sleep. Please stop these late night flights in our neighborhood!	Comment not directly relevant to the proposed project.

156	<p>I live on S. 16th Street in Arlington in the residential neighborhood just next to the 3rd River House (The Ashley House) near Pentagon Row on Joyce Street. I have had many sleepless nights recently as we are getting increased air traffic at all hours of the night. I thought the airport was to stop all or most traffic by 10:30 pm and pick up the next morning at 7 am. This is not happening at all and the noise has definitely picked up in recent months, especially since January. I have made complaints to the FAA of some of the planes flying over at 12:30 pm, 2 am, 3:25 am, and other times at night. And morning traffic begins sometimes before 6 am. Also, we are experiencing more helicopter traffic flying very close to the roofs of our homes. I have 2 long cracks in the living room ceiling that may have come from the vibrations from the noise of these helicopters. Since my ceiling was recently replastered and painted as part of a home renovation, it is particularly disturbing and expensive to now have to have this redone just 2 years after it was completed. Finally, I run my business from my home and inasmuch as I am a psychotherapist, we require quietude. This is becoming a real disturbance with my clients often commenting on the noise. Please review these policies as I am really stressed out from it to the extent that I am thinking of moving despite spending \$355k to prepare my home for another 30 years here. I have lived here since 1987 and am just heartsick to have to be considering a move. My recommendation is to stop all traffic after 10:30 pm and start no earlier than 7 am. Also I would recommend planes coming up from the south of the Potomac. And finally, I would recommend reducing helicopter traffic that flies across our houses from Andrews, Quantico, the Pentagon and around nearby 395 during rush hours.</p> <p>Thank you for your consideration and hopefully some actions that are sensitive to those of us who pay such high real estate taxes for very little improvements in our immediate area.</p>	<p>Comment noted, refer to the general comments sections regarding noise analysis.</p>
157	<p>I write on behalf of the Donaldson Run Civic Association (DRCA) in Arlington. DRCA has many members whose homes and parks nearby are directly under both approach and departure flight paths since FAA implemented these paths in 2017 under the NextGen program. The latest proposed changes to departure flight paths appear to exacerbate this situation. DRCA recommends the one approach that FAA could employ with its new technology that would lessen the environmental impact of DCA flights on both Maryland and Virginia communities-- and that is to maximize the duration of approach and departure flights over the center of the Potomac River for Northbound departures and Southbound arrivals We trust the jointly-funded Arlington-Montgomery County study of these troublesome matters can and should facilitate a dialogue with FAA to remediate the continuing disturbances that flights into and out of DCA visit upon our members. In the meantime it would be advisable to avoid further flight profile changes such as the one under consideration until this dialogue, based on the imminent, jointly-funded contract can occur.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, Air Quality, and Results of HOLT B.</p>
158	<p>Loud enough to disturb inside my home with windows shut. There is a constant stream of loud aircraft this morning.</p>	<p>Comment not directly relevant to the proposed project.</p>
159	<p>The plan you implemented, HOLT B, on January 31, 2020 has caused an intolerable volume of aircraft noise over my home and in our community. Your public notice implies that only 10% of flight travel the test route. If the plan is accepted and fully implemented for all flights on that route we will not be able to have outdoor conversation, enjoy television or music inside our home or sleep at night. I think your staff can develop less noise intrusive flight plans to better serve citizens and taxpayers in Arlington County.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, Air Quality, and Results of HOLT B.</p>

160	<p>Regarding changes to the north/south flight paths from DCA by the FAA, the comment period to proposed FAA changes needs to be extended. Without adequate explanation, which is required by law, the FAA proposes a new procedure with respect to “north-flow departing aircraft.” It fails to sufficiently inform the public of the law enforcement or national security justifications for adjusting the flight path tracking the river. It appears that that law enforcement agencies, concerned about incursions into “secure” airspace, have requested the FAA to change the flight path, without adequate study. The “trial period” diverts planes south of the river and directly over the homes in those neighborhoods including but not limited to mine. The FAA has failed to study the need for these changes or explain them to the citizens who are impacted. Further studies of the impact on national security must be done. Further studies on environmental impacts must be done. We reside in Arlington since 1983 and in Bellevue Forest, one half mile from the Potomac River, since 1992. We are concerned about the health risks from noise and air pollution, and potential safety issues when massive airliners fly only hundreds of feet overhead, and how this constant noise, pollution and risk affects the quality of our and our neighbors’ lives. The health and safety of our neighborhoods is being threatened. The FAA is advancing changes in the flight paths over Arlington. Aircraft departing to the north from DCA cause them to cross over our home routinely - with maddening regularity. The radar track data from Web Trak (https://webtrak.emsbk.com/dca) indicate that at least 90% of the departures cross from DC to Virginia over the Potomac river, flying over the Parkway and into my neighborhood. This is an inordinate number of flights which are not fairly distributed throughout the wider airspace. Already the noise is incessant, with arrivals and departures occurring every hour of the day and night by commercial aircraft. Regional routes using older, heavier, slower and noisier aircraft frequently fly directly overhead, well beyond the river border as early as 5:10am and as late as 2:12am. There is a clear shift of flight paths further into Arlington, according to FAA proposal and trial period. For a large stretch from Bellevue Forest to Arlingwood neighborhood at Chain Bridge, flights are directly overhead, and also west of Chain Bridge Road. The elevation of these neighbors is about 275 feet. The long ascent of departing aircraft overhead is a danger to human life in the event of a mechanical failure. Often, I am frightened to see and hear low aircraft over my neighborhood thinking a crash is imminent. The loss of life and property was devastating to the community of Rockaway NY, killing 265 people, when an airliner crashed departing JFK in 2001. In addition to the impact of noise pollution on our health, other hazards of planes flying at low altitude create additional health risks. The toxic sulfur emissions from aircraft exhaust is a known contributor to air pollution and deaths. The FAA is aware of these impacts and knowingly directs planes over our neighborhood. A few hundred feet makes a difference in the noise and air quality. Planes ascend at the same level where homes are located. The elevation of my home is 85m/279ft. Sunday landings are incessant, and directly overhead, and so close that you can read the tail numbers. The Arlington County Board and Congressman Beyer have lodged protests. Arlington, and Montgomery County has contracted with a private firm to conduct a joint aircraft noise and mitigation analysis study. Federal environmental reviews need to be conducted.. We urge the FAA to participate in the study as part of its community engagement at DCA, to allow for a fully informed decision on a matter that impacts so many citizens.</p>	<p>Comment noted, refer to Topical Responses for Noise, Air Quality, Need for the Proposed Actions, Air Quality, and Results of HOLTB.</p>
161	<p>I've lived in my Maywood Historic District home in Arlington, VA, for 19 years and for many of those years, plane noise was often unremarkable, unnoticed, and not an issue. Today, however, the airplane noise is obtrusive, concentrated and unbearable. You have allowed bigger/noisier planes to fly, day and night, over my home in N. Arlington. The implementation of a new flight path, severely degrades the quality of life for my family and many others in N. Arlington. Plane noise awakens me by 5:45 am (and often in the middle of the night—try 2:15 am, 4:20 am, etc!) and continues unabated from 5:45 am every 3-5 minutes through the day often until midnight, seven days a week. It's so loud that ear plugs and white noise do not keep me from awakening; phone calls are interrupted; and the noise is now ever present. The FAA has pushed these changes through without concern for public health and well-being using assertions regarding "airspace safety" when most can discern that this is an economic choice to bring in more frequent flights with bigger planes. Public meetings have come after the fact, and without benefit of noise impact research. I personally try to lodge noise complaints each time I am awakened between midnight and 6 am, but the very complicated complaint system often spins around (is unavailable) during the most obnoxious interruptions of my sleep hours. (Overload? Technical issues? My lack of cognitive function at 2am?) Let's face it, the complaint system is way too complicated by design. Now, you have an ombudsman too—because people are angry with the noise, the labyrinthine complaint system, and with the FAA's complete lack of concern for basic well-being. I could complain every single day (multiple times) about the airplane noise that you have been allowed to foist upon me (without oversight) with changed flightpaths, and increased allowable size regulations. Instead, I ask you to create a better balance between the needs of the airline industry, passenger counts and the communities you serve by establishing no fly times, severe punishments for planes that break these rules, and size restraints that allow for people in these communities to sleep seven hours without plane noise disturbance. You have degraded the quality of life here, putting airline corporate greed above accountability and common-sense.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, Air Quality, and Results of HOLTB.</p>
162	<p>Woken by planes again</p>	<p>Comment not directly relevant to the proposed project.</p>

163	I strongly object to making the test flight changes permanent for the Northbound DCA. Clearly it will adversely affect the Rosslynn Courthouse neighborhood with increased proximity to aircraft. It is clear that the FAA modelling tool has not accurately forecast the noise impacts of every previous flight departure procedures since the start of NextGen. Every change made by FAA to the flight departure procedures, except one, since the implementation of Next Gen has greatly increased the noise in my yard and vibration in my living room, and greatly exceeded any FAA forecasted noise level in my neighborhood. While the FAA representative at one of the 2019 monthly DCA noise working group I attended, stated that the noise modeling reflects topography. The modelling used in FAA environmental assessments does not accurately reflected the tremendous increase in noise experienced by residents in South Arlington and particularly those living on the east and north facing slopes of Arlington Ridge (the Aurora Highlands and Arlington Ridge neighborhoods) facing DCA. The FAA noise contours in the model don't budge when the contours cross the ridge. A simple google search (or a walk down the ridge) can confirm that noise impacts are tremendously worse against ridges. Are the noise impacts from DCA and NextGen only considered by individual runway departure procedure? If so, under FAA regulations, can the noise impacts of all departure procedure changes since NextGen be considered an thoughtful, equitable, valid and comprehensive analysis from pre NextGen base conditions; is it valid under FAA regulations not to consider all these changes together? Northbound Runway 1 departures regularly register 60 to 65 DB – consistently and almost continuously. My neighborhood is now also under the diversion flight path for aborted landings and a holding area for helicopters landing at DCA. The dramatic increase in southbound departures (which consistently measure at 70-75 dB at evening rush) means my neighborhood gets tremendously more and louder noise. Finally the increase in transit time across the bowl of the ridge of aircraft (i.e. the new more southerly/westerly path (and associated ascent profile change)) of northern departures from the auxiliary runway 15 means a much longer duration to sound exposure and total cumulative disturbance to south Arlington neighborhoods like mine. While to many it may seem to make sense to increase the variety and direction of departure procedures ameliorate noise conditions for a specific departure path, but spreading the noise just subjects more people to noise problems. And the changes to spread the noise have actually dramatically increased the noise for anyone close to DCA. In summary, I do not support the changes to the flight path because I believe it will increase the noise damage I experience in my home and do similar damage to folks living in Rosslyn. I have slept in my house with my windows open for 26 years until 2016. Now I use earplugs and attenuators in my backyard, keep my bedroom windows closed and still use attenuators to sleep. I used to need/depend upon one small window AC until for my now. Now I will need AC.	Comment noted, refer to Topical Responses for Noise, Air Quality, Need for the Proposed Actions, Air Quality, and Results of HOLTB.
164	3/15/2020 @ 9:00 or so a plane flew over our House thought it was going to hit our house flying to low we have been living here for 37 years and planes don't fly over our house this needs to stop!!!	Comment noted, refer to Topical Responses for Noise.
165	Please change the flight pattern!	Comment not directly relevant to the proposed project.
166	During the past couple of months, the noise from aircraft departing from DCA has been noticeably louder and seemingly more frequent than it had been before. Although it is winter and our windows are closed, the aircraft noise is often loud enough to disrupt conversation inside our home. In summers past, when we were outside, we would occasionally be disturbed by the noise of aircraft but it was not constant. If the current aircraft noise situation continues, I am concerned that we will spend future summers indoors with our air conditioning on as the aircraft noise will make being outdoors for any length of time unbearable. This is intolerable and very adversely impacts our quality of life and the quiet enjoyment of our home.	Comment noted, refer to Topical Responses for Noise.
167	I was woken up by them and now they are going over one after one. ——curfew until 7am!!! Go back to river route	Comment noted, refer to Topical Responses for Noise.
168	Having grown up in DC living along the river, I'm all too aware of the volume (in quantity and sound) of the airplanes flying over our house. Please go to HOLTB.	Comment noted
169	The airplane noise is extreme. Please implement HOLTB for a better path.	Comment noted
170	Please continue with HOLTB. It seems like forever that I am awakened by low-flying planes beginning at 5:30. And sometimes earlier.	Comment noted
171	I often work from home and the airplane traffic is very low and loud. Normal conversation is interrupted. Please implement HOLTB.	Comment noted
172	I work from home and normal phone conversations get interrupted by the low-flying DC-sided path that airlines take. Please implement HOLTB.	Comment noted
173	Living in DC where there's ongoing air traffic noise throughout the day, I am strongly in favor of the proposed new FAA flight procedure that would lessen the traffic here somewhat.	Comment noted

174	As a citizen living several miles from the Potomac River, the combination of airplane noise and helicopter noise is unbearable. My house shakes with every passing, and I can't sleep. We don't even get 8 hours of quiet in the night. That is ridiculous. From my house, it sounds like I live on a military base. My windows rattle with every helicopter and I can forget about any picture on the wall being straight. Wearing earplugs is not an option since it is unsafe. I would not be able to hear any smoke alarm. This HAS to stop!!! If I wanted to live near an airport I would have done so, and paid a lot less in taxes on my property. I'm writing this email at 10:40 at night and the planes are still roaring, one after another. Please reconsider the flight path or at least the times that you permit planes to fly. Having eight hours of quiet in the night is not an unreasonable request.	Comment not directly relevant to the proposed project.
175	I am in favor of the new FAA flight procedure - HOLBT.	Comment noted
176	I am concerned about the proposed change in DCA flight path over Arlington, Virginia. I live in Rosslyn/Court House and the planes overhead were already quite loud and noticeable before the change, but it is worse now, especially when planes take off in our direction. Adopting the new flight path permanently will make it even more difficult to fully enjoy my home and community, as noise from planes tends to drown out everyday activities such as talking with neighbors as our young children play. Additionally, more planes over our neighborhood increases the safety risks from activities such as flying too low when visibility is limited (IFR conditions). Please consider the community members before making this change permanent.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
177	Since 6 AM we had noisy planes fly above the house for landing at Regan every 10 or so minutes.	Comment not directly relevant to the proposed project.
178	Daily flights to and from DCA are TOO LOW over 22308 residential area and too frequently follow the exact same flight path. Please require plane to increase altitude closer to airport, above 3000 feet over residential neighborhoods and schools. Fan / broaden the flight paths so planes are not over exact same neighborhoods all day everyday. Move flight path over Potomac River (as was done in past) and require higher altitude sooner in take off and later on landings. I'm not concerned about the early flight at 5:15 am or late at 11:30 pm as long as the altitude increased. Fly higher and cause less noise (very loud - loud enough to interrupt conversation in doors and stop conversations when outside) please be considerate of residents and schools in 22308 and through old town. Please stop turning west before proceeding further south - past Mt Vernon / Occoquan. Adjust the NextGen GPS guided software to reduce low altitude flights over residential areas. Stop the MetroPlex flight paths. Fan / distribute the paths over the river.	Comment noted, refer to the general comments sections regarding noise analysis.
179	The frequency, duration, and noise levels in Old Town North have become intolerable. I have also observed low-flying/landing planes over the Potomac. After persistent complaints to the airport and public officials, I have no recourse other than to dissuade tourism and real estate investment via social media and other web platforms. The health effects of sleep disruptions are well documented. This is a controllable livability issue that is going unchecked.	Comment noted, refer to the general comments sections regarding noise analysis.
180	In the last two weeks, the loud and frequent noise from Reagan National Airport has become a health and livability issue, with sleep disruptions beginning well before 6:00 am and extending after midnight. I have observed lower flying planes over the Potomac and noise levels that are disruptive even when using earplugs. I've filed complaints on the Reagan National Airport site but to no avail. I'm now going to post on tourism and real estate sites dissuading hotel and property expenditures. This is absurd. Noise abatement protocols are not being observed. Perhaps by dissuading investment, my complaints will be heard.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
181	I am a new homeowner in the Cherrydale neighborhood and I am strongly opposed to the new proposed flight path. The noise and disruption will greatly degrade the quality of life and property values in my area.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
182	One after another for the last hour (every 3 minutes or so) — sitting on my deck not pleasant anymore— the last one that went over was so low I could have almost waved at the passengers Woken this morning by planes and finishing the night with plane noise please change this	Comment noted, refer to Topical Responses for Impact of COVID-19.
183	The FAA needs to extend the comment period because of the COVID-19 crisis.	Comment not directly relevant to the proposed project.

184	<p>This correspondence pertains to the recent change in flight paths to and from Reagan National Airport. We've lived in the Dover Crystal and Riverwood neighborhoods in Arlington, VA, since 1994 and accepted that some noise was inevitable due to our close proximity to Reagan National Airport. During the past several months, however, the noise has increased dramatically. Planes now fly directly over our home - literally right above our house. The noise is deafening. We have to sleep with windows completely closed - no more cracked windows at night for fresh air. Even then, we are sometimes awakened by continuous and extremely noisy morning departures. It's our understanding that the vast increase in noise is due to recent FAA changes in the flight path to and from Reagan National Airport, diverting flights from the area closer to the river and further from downtown D.C., and that this was imposed due to national security concerns. Unfortunately, it is hard to understand the FAA's poorly written description of this change, why it is necessary, and whether it really helps national security. We object that there was no consideration given to the adverse effect this has had on neighborhoods. We object that there was no environmental impact study done on the extremely disruptive increase in noise. And, we object to the increase in toxic sulfur emissions from air plane exhaust - a known contributor to pollution even at microscopic levels - from low-flying aircraft now directly above our houses and yards. We ask that further studies on the environmental impact of this recently implemented flight path be done that considers the impact on people as well as ecosystems. Surely there are other alternatives that will achieve the national security - or other - objectives at a lesser cost to the environment. We ask that the FAA and other federal agencies involved in this changed flight path work closely with the Arlington County Board - and other impacted communities in MD and the District - to find a workable solution that mitigates the noise. We cannot have a conversation in our back yard - especially in the morning and late afternoon/early evening when planes depart or arrive one after the other - sometimes only 30-45 seconds apart. While the noise due to the change in flight path is our greatest concern, we have to mention that departures from the airport now occur as early as 5:30 a.m. - this is routine. And, they continue into the night, sometimes as late as 10:30 p.m. - once or twice in February we even heard (loud) arrivals as late as 11:30 p.m. We are both retired military officers and have continued working in the Federal government. We understand the need to address national security concerns. But, sudden changes to the flight path that may or may not improve national security for the nation's capital should not be imposed without careful, thoughtful consideration of the citizens who reside here. We look forward to hearing your response and sincerely hope that our concerns will be addressed.</p>	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLT B.
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185	<p>Comments on DCA flight path changes by Mark and Leanna McEneaney, Arlington, Virginia pg 1 of 41. The flight path changes are not justified. Former Director of the U.S. Secret Service, Randolph Alles, stated in August 2018 that the increase in the number of annual incursions into Prohibited Area P56-A airspace from 33 in 2012, to 52 in 2017, is of great concern to the Secret Service. The Secret Service has good reason to be concerned about aircraft overflying the National Mall with possible hostile intent. But hostile intent is not an issue in any of the incursions that the Secret Service says are of great concern and it is difficult to see how P56-A is relevant for preventing hostile acts or for providing sufficient warning if one were to occur. A small number of minor incursions for which there may be extenuating circumstances does not justify moving 94,000 departures per year over Arlington neighborhoods where aircraft noise is already a serious problem.</p> <p>2. The flight path changes will increase noise in Arlington neighborhoods where aircraft noise already exceeds thresholds established by the EPA, WHO and Arlington and further endanger public health and welfare in these neighborhoods. Table 1. Selected neighborhoods where, in 2019, aircraft noise exceeded thresholds established by the EPA, WHO and Arlington to protect public health and welfare with an adequate margin of safety. The FAA's criteria for determining the significance of environmental effects are not suitable for protecting public health and welfare with an adequate margin of safety or for achieving the goal of NEPA which is for man and nature to co-exist in "productive harmony". The FAA has reviewed a noise screening analysis for the proposed flight path changes and declared that the changes are categorically excluded from requirements for further environmental review. This declaration is not justified because the criteria the FAA used in its screening analysis are not suitable for determining the significance of environmental effects. The criteria the FAA uses in its screening analysis are based on a deliberately permissive, "maximum tolerable" 65 DNL threshold criterion designed to allow aircraft to overfly communities with impunity and they are grossly inconsistent with criteria established by public health authorities to protect public health and welfare.</p> <p>Comments on DCA flight path changes by Mark and Leanna McEneaney, Arlington, Virginia pg 3 of 4. The wide gaps between the FAA's 65 DNL threshold criterion and the 55 DNL threshold criterion recommended by EPA for protecting public health and welfare with an adequate margin of safety and the 45 LDEN and 40 LNight criteria strongly recommended by the World Health Organization for preventing adverse health effects clearly show that the FAA's criteria are not suitable for determining the significance of environmental effects which is not news to the FAA: From "Report 2005 R -- Technical Background for Noise Abatement in HUD's Operating Programs" (November 1971) by Ted Schultz, whose work underpins FAA noise policy: "It should be emphasized that criteria in the NEF 30 range [~65 DNL] must be regarded as provisional. In each of the national studies in which these limits were developed, these levels showed up as "maximum tolerable" and were regarded as turning points above which annoyance increased very rapidly; but sizable portions of the population were seriously disturbed at much lower levels. These turning points, however, were seized by the authorities and treated as acceptable levels such that special precautions and noise abatement measures are required only for more severe exposure. The situation is even more extreme in the U.S., since the criteria are based on overt action in terms of complaints or legal action. It is well known that serious public annoyance is prevalent long before official complaints are lodged. It is therefore obvious that these criteria are not adequate for aircraft noise abatement in the long run, since they are deliberately permissive. While they may be useful for the immediate purposes of halting the degradation of the noise environment, they are hardly suitable as goals for improving it." The FAA defends its criteria by saying they are consistent with guidelines established by the Federal Interagency Committee on Aviation Noise (FICAN) which they are. FICAN members, who overwhelmingly represent the transportation industry and the military, are stakeholders but they are not the only stakeholders and they are not public health experts. FICAN's criteria are not suitable for the same reasons that the FAA's criteria are not suitable. Consistency is not a substitute for suitable criteria for protecting public health and welfare with an adequate margin of safety.</p> <p>4. The FAA is withholding information that importantly affects the determination of significant environmental effects. In 2015, the FAA launched a comprehensive national survey designed to update its noise policy which noise</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLT B.</p>
186	<p>I've lived in Arlington (near Clarendon) for approximately 25 years and worked nearby or from home for 15 of those years. Until the past few years (and months, especially), I have never had an issue with plane noise. Some of the recent fly overs sound like they may be military because of how loud they are and how they rattle our home. I also understand that it's increasingly possible that some of the noise, which is becoming more frequent, is from new traffic patterns from DCA. This traffic is unpleasant and disruptive and, if history is any indicator, unnecessary. The previous routes over the river seemed to lessen the impact on surrounding neighborhoods. I hope that the recent disruptive flight patterns will be adjusted to return to the relative quiet of our neighborhood in year's past.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLT B.</p>
187	<p>The changes to the flight path have resulted in an enormous noise problem in my neighborhood of Arlington (Lyon Village). Despite not being particularly close to the river, each morning at 5:45/5:50a, the windows begin to vibrate with the passing of the first takeoffs from DCA. This did not occur before - it is all a result of the revised flight paths. I am greatly opposed to making this change permanent. We need to go back to sharing the noise burden equally with DC and keep the planes in the center of the river.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLT B.</p>

189	The Arlington area is home to thousands of employees, including those that work from home. Changing the flight path will negatively impact Arlington residents who work in the area in both noise pollution and air pollution.	Comment noted, refer to the general comments sections regarding noise and environmental analysis.
191	The burden of constant aircraft noise has made raising my family - and working - in Arlington significantly harder. As somebody who grew up under the Dulles flight path (and was originally born in Alexandria, under the southern approach to DCA), I am more accustomed than most. However, with the amount of growth in Arlington, I can only imagine that the trouble of raising kids in that environment - pausing conversations, losing naps, people not wanting to go outside depending on which runway is in use that morning - is not just something I experience. The planes do have to go somewhere - but even an adjustment of 1/4 to 1/2 a mile makes a huge difference in sound attenuation.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
192	I have lived in the Lyon Park neighborhood since 2012, and previously resided in Rosslyn from 2010-2012. I live on a moderately busy corner (with regard to traffic) and am no stranger to a significant amount of background noise. I moved to the neighborhood (and house specifically) with knowledge of the proximity to Washington National Airport, as well as the streets that intersect at our location. However, since the flight path for National airport was changed, I have noticed significant and lasting effects in how the noise impacts our daily lives. Previously, our son (7) never woke from plane noise. However, both our son and daughter (1) have woken from naps and overnight/early in the morning due to significant departing plane noise, even with our windows closed. With the windows open, we have to pause television programs, cease conversation, and otherwise wait for the noise to abate dozens of times in a day. I would strongly encourage that the flight path be restored to its previous (more Potomac-centric) routes to ameliorate the significant impact this change has wrought to one of the most dense residential corridors in the area.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
193	Went to bed with the airplane noise last night and woke up to it this morning. Flights could be heard at 7:37am, 7:39, 7:40, 7:42, etc.	Comment not directly relevant to the proposed project.
194	I'm writing to submit another complaint regarding noise disturbance from airplanes on March 12, 2020 at 5:45 am..	Comment not directly relevant to the proposed project.
195	I would like to voice my deep concern with the proposed change of flight plans for Reagan National Airport/DCA. We are a family living in Lyon Village/Clarendon in Arlington, VA with 4 children in a single family house. Already today, our quality of life is affected negatively by the close fly-by of the commercial aircrafts from DCA, would the flight plans change to move even closer it would have detrimental effects in our ability to sleep or spend time outside in our yards and neighborhoods. Additionally, there is not only the noise pollution but also the air quality concerns with having airplanes landing and taking off over our homes and schools. I am happy to come testify in person or sign any petition against this proposed plan.	Comment noted, refer to Topical Responses for Noise, Air Quality, Need for the Proposed Actions, and Results of HOLTB.
196	From 5:30 am to after 11:30 pm we hear low flying airplanes (less than 2000 ft) in same exact path with as few as 2 minutes between landings. Please use higher altitudes or spear the flight path over a wider area and reduce number of arrivals and departures. Repeated low flying large aircraft following same flight path is causing us to lose sleep, have anxiety, speak louder, keep windows and doors shut, not able to sit outside on patio. We fear planes are going to crash because they are so frequent (within minutes of landing relative to each other) and so low. Please revert back to flight paths and altitudes pre FAA NEXTGEN and pre - METROPLEX. This constant loud low noise from aircraft at DCA in low and frequent paths is causing emotional and physical health problems.	Comment not directly relevant to the proposed project.
197	Airplane noise at 9:24pm, 9:25pm, - very disruptive as we get ready for bed.	Comment not directly relevant to the proposed project.
198	I live three blocks west of the Potomac River in Arlington, just north of Spout Run. We are plagued with airport and helicopter noise from morning to night. Just today, I noted four planes well on the Virginia side, perhaps just a block and a half away from me or halfway to the Potomac River, as they were landing at National Airport. A few days ago two very noisy helicopters came over, again on the Virginia side, around 3:45 in the afternoon. Rumor has it here in Arlington that Georgetown residents have pushed the National Airport flightpath into Virginia to have a bit of quiet for themselves. I hope that's not true. On a related subject it would be sensible if planes were permitted to land and takeoff at National Airport only between the hours of 7 AM and 11 PM – as it used to be. That would permit all of us to have a bit more sleep early in the morning and late in the evening. It would also save the passengers who travel before seven and after 11 from themselves. There is no need for them to rush off at 5 o'clock in the morning to get to a 9 AM conference in Chicago. Surely all of that can wait.	Comment noted, refer to Topical Responses for Noise.

199	Loud flights going over foxhall village DC	Comment not directly relevant to the proposed project.
200	Loud noise this evening at 8:20pm, 8:24pm, 8:27pm, 8:29pm, etc as we were trying to relax and put our little one to bed.	Comment not directly relevant to the proposed project.
201	"The Noise Screening Analysis Report For Ronald Reagan Washington National Airport" Prepared by the Environmental Policy Team and issued on February 21, 2020 uses a flawed methodology, must be disregarded, and cannot serve as the basis for any modifications to DCA departures. Specifically, the noise analysis relies on Above Field Elevation altitude data and does not account for the local ground elevation. This results in parts of North Arlington with higher elevations being subjected to substantially higher noise levels than reflected in the report. An analysis should be performed based on actual noise measurements taken at locations within the flight path with the highest elevations (i.e., at the tops of hills). Without such measurements, you are unable to determine the actual impact of noise on the community.	Comment noted, refer to Topical Responses for Noise.
202	This correspondence pertains to the recent change in flight paths to and from Reagan National Airport. We've lived in the Dover Crystal and Riverwood neighborhoods in Arlington, VA, since 1994 and accepted that some noise was inevitable due to our close proximity to Reagan National Airport. During the past several months, however, the noise has increased dramatically. Planes now fly directly over our home - literally right above our house. The noise is deafening. We have to sleep with windows completely closed - no more cracked windows at night for fresh air. Even then, we are sometimes awakened by continuous and extremely noisy morning departures. It's our understanding that the vast increase in noise is due to recent FAA changes in the flight path to and from Reagan National Airport, diverting flights from the area closer to the river and further from downtown D.C., and that this was imposed due to national security concerns. Unfortunately, it's hard to understand the FAA's poorly written description of this change, why it is necessary, and whether it really helps national security. We object that there was no consideration given to the adverse effect this has had on neighborhoods. We object that there was no environmental impact study done on the extremely disruptive increase in noise. And, we object to the increase in toxic sulfur emissions from air plane exhaust - a known contributor to pollution even at microscopic levels - from low-flying aircraft now directly above our houses and yards. We ask that further studies on the environmental impact of this recently implemented flight path be done that considers the impact on people as well as ecosystems. Surely there are other alternatives that will achieve the national security - or other - objectives at a lesser cost to the environment. We ask that the FAA and other federal agencies involved in this changed flight path work closely with the Arlington County Board - and other impacted communities in MD and the District - to find a workable solution that mitigates the noise. We cannot have a conversation in our back yard - especially in the morning and late afternoon/early evening when planes depart or arrive one after the other - sometimes only 30-45 seconds apart. While the noise due to the change in flight path is our greatest concern, we have to mention that departures from the airport now occur as early as 5:30 a.m. - this is routine. And, they continue into the night, sometimes as late as 10:30 p.m. - once or twice in February we even heard (loud) arrivals as late as 11:30 p.m. We are both retired military officers and have continued working in the Federal government. We understand the need to address national security concerns. But, sudden changes to the flight path that may or may not improve national security for the nation's capital should not be imposed without careful, thoughtful consideration of the citizens who reside here. We look forward to hearing your response and sincerely hope that our concerns will be addressed.	Comment noted, refer to the general comments sections regarding noise analysis.
203	I moved to N. Arlington about 14 years ago with the assurance that the airport traffic noise was regulated to be reasonable. The flight path was down the Potomac River, NOT OVER HOMES. The flight times were limited so that people could actually get sleep. I have a serious medical condition (Lupus) that requires consistent quality sleep. The changes that have been happening to the flight path and flight times have dramatically affected my health and will continue to do so if you keep abusing the citizens of North Arlington. Moving the flight path south of the river is only the most recent betrayal of the citizens of North Arlington. Time limits (7am - 11pm) were blown away. Aircraft flight distance (and therefore size and therefore noise) was increased. And now after years of study and months of community involvement we are supposed to believe that the centerline of the Potomac is no longer safe for the White House. Not credible! Please, do not impose this nuisance and health hazard on your own citizens	Comment noted, refer to Topical Responses for Noise.
204	For the first 3 months I lived in Rivergate, I never heard a plane take off or land. The flight path was over the center of the Potomac and planes did not turn until they were at the Woodrow Wilson bridge. Now, planes fly along the Virginia shore, sometimes going right over our houses. We hear planes all the time. Sometimes before 6 am and after 10 pm. Please restore the flight path to over the CENTER of the Potomac until planes reach the Woodrow Wilson bridge and are over 3,000 feet altitude. We don't want to burden our Maryland neighbors with the noise, we just want the original flight path restored.	Comment noted, refer to Topical Responses for Noise.
205	Aircraft departing south from Ronald Reagan National Airport have been flying closer to or over the Virginia shoreline. Please instruct pilots when they are VMC to attempt to fly over the middle of the river until past the Wilson Bridge.	Comment noted, refer to Topical Responses for Noise.

206	Moving the flight path south of the river will put aircraft continually and directly over residential neighborhoods of North Arlington, away from the Potomac centerline. [Time limits (7am - 11pm) have also been ignored. Aircraft flight distance (and therefore size and therefore noise) are increasing.] After years of safe operations, the FAA under President Trump has concluded that the centerline of the Potomac is suddenly no longer safe for the White House. Please, do not impose this nuisance on my neighborhood.	Comment noted, refer to Topical Responses for Noise.
208	We totally support the flight plan changes proposed by the US Secret Service. In addition to the security benefits protecting the no-fly zone, this change would alleviate some of the disproportional amount of noise over the DC neighborhoods on the DC side of the Potomac River which has been exacerbated by the current flight path	Comment noted
209	Flights going over for the last 45 minutes — too early, too loud , too close to our houses	Comment not directly relevant to the proposed project.
210	I approve of the current route that the planes are taking. The noise is lessen a lot.	Comment noted
211	I wish to register a complaint about the recent heavy increase in aircraft noise, particularly between the hours of 8pm and 11pm. This will be an even greater inconvenience as spring and summer approach. Please revert to the previous flight plans.	Comment noted, refer to Topical Responses for Noise.
212	Plane noise seems to be getting worse with more frequent and lower flying planes. This is particularly disruptive in the early morning (often before 6am) and late evening (frequently well past 11pm).	Comment noted, refer to Topical Responses for Noise.
213	Hello and thank you for the opportunity to comment. I live along the flight path for Reagan National Airport. I agree with the FAA plan, HOLT B, and I would like to see it implemented.	Comment noted
214	It is inexcusable to ask a few neighborhoods on the West side of the Potomac in northern VA to bear the full brunt of the air and noise, pollution imposed by routing Reagan air traffic almost exclusively over this side. Flight patterns over the Potomac River make sense for equity, safety, and security reasons (am sure Langley is not pleased) and there has been no public process for deliberation and airing of comments or concerns. Flight patterns have been fine mid-river for decades, so why are they being imposed on us without a fair process or considerations to health and wellness if people and the surrounding habitat? Increased number of flights on substantiates the reason for additional deliberation.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLT B.
215	For the past year, We have been disturbed by the incessant noise of the airplanes, even around 4 am at night people are taking sleeping pills and house are on sale this is not a situation that can last	Comment not directly relevant to the proposed project.
216	Please stop the planes from flying over our neighborhood. The noise in destroying our quality of life. We cannot spend time in our yard and are awoken at 5:45 AM every morning. This needs to stop.	Comment not directly relevant to the proposed project.
217	Please, we beg you, move the flight path so that the citizens along the DC side of the river can have a reprieve. We cannot hear each other talk when we are outside. The planes fly over every few seconds and truly impedes our quality of life.	Comment noted
219	Since the temporary change in flight paths out of DCA has been implemented the noise level has definitely increased over our residence in Rivergate Place along the Potomac River. It is really hard to understand why South bound planes taking off from DCA or landing from the South to DCA can not fly over the middle of the Potomac and give more distance to the communities on the riverbanks. I can understand how North bound flights need to avoid the DC capital area airspace - but to the South it should be OK for the flights to travel in the middle of the Potomac. Please do not implement the temporary changes. Give the communities more space and keep them quieter.	Comment noted, refer to Topical Responses for Noise.
220	Multiple commenters: I agree with the new FAA Flight Procedure - HOLT B - and would like to see it implemented	Comment noted, 21 identical comments
221	Please route the planes over the river. Right now they fly over our back yard and with the earlier and later flights recently added to the schedule it becomes difficult to enjoy any quiet sleep time	Comment noted, refer to the general comments sections regarding noise analysis.

222	<p>Having lived in our home for 29 years, I have observed the slow erosion of any flight rules that once governed the coexistence of Reagan National and surrounding residential areas. Over the years, the departure time has moved from 7 am. up to 5:45 am from National. The flights are approx. 45 seconds apart - creating constant noise in the early morning - so much so that we cannot have our windows open in the spring and fall. Furthermore, the gutting of the "distance rules" means that the airplanes heading to western cities are heavier and noisier - and more frequent. The final, and most recent, indignity is the routing of airplanes directly over our house and neighborhood. I feel the FAA, congress and Washington Airports Authority have robbed North Arlington of the peaceful co-existence we once had with the airport. I am extremely opposed to the new flight paths being imposed by the FAA on North Arlington and our neighbors in Northwest DC. As I sit here typing this comment, 12 planes have flown over our neighborhood and house.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
223	<p>Multiple commenters: In summary, the noise generated from these planes flying over our neighborhood affects the quality of our life. It doesn't make any sense why these plans aren't flying above the Potomac River when departing from or arriving to National Airport. The agency's write-up is poorly written and unclear. The write-up does not sufficiently inform the public of the change or the reasons why it necessary. To wit, by my read, the FAA proposes a new procedure only with respect to "north-flow departing aircraft" yet with my eyes I see change with respect to arrivals coming south. The obligation of the FAA to adequately identify the changes it proposes is not some nicety—it is actually a requirement imposed by law. Further studies of the impact on national security must be done. By my observation, flights arriving from the north continue to track the river around to Cabin John and, after flying over Bellevue Forest, fly back over the river (but still on an eastern track) around Rosslyn. Obviously, I am not an expert on aviation. But does this truly achieve an adequate measure of added security? As many of us will recall, our nation's leaders struggled in the wake of the 9/11 attacks with the decision to reopen Reagan National. I support Reagan National, but the national security implications of operating the airport at its current levels must be looked at with clear eyes and a level head, not boosterism for the airport. If this change truly helps national security, that is one thing, but if it is simply a fig-leaf then it is our duty to push back. Further studies on environmental impact must be done. Does it really make sense that that entire flight volume of a major national airport is diverted over a river that is a fragile ecosystem? Does it not make sense to spread this impact more widely, so many areas have a little exposure rather than one area have the entire exposure? What will be the impact of this change on our birds and insect life—what is the effect on Potomac Overlook? What other alternatives are there that will achieve the objectives at a lesser cost to the environment?</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
224	<p>I approve of the change in flight pattern for DCA. It has been a godsend for my mental health.</p>	<p>Comment noted</p>
225	<p>Loud air noise and frequency of the flights over our houses have increased dramatically. Please help us!</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
226	<p>I live in Foxhall Village and am very much in favor of the new FAA flight procedure - HOLBT. Please implement it.</p>	<p>Comment noted</p>
227	<p>I support altering the flight path - planes MUST BE in the no fly zone if my house is between them flying in and the potomac river - it means they are way beyond the accepted flight path and hence absolutely must be in the no fly zone. The weather status doesn't make a difference. I support stricter 'stay in your lane' flight path. They are supposed to be over the Potomac River and definitely ARE NOT.</p>	<p>Comment noted</p>
228	<p>The new flight routes over north Arlington, Virginia are unacceptable. The constant noise is disruptive and planes start flying continuously as early as 5:30 AM and continue well after 11:00 PM. I am two blocks from an elementary school and the noise at certain times (like now, 12:26 PM) is unrelenting. The altered pattern closer to residential neighborhoods and schools brings flights overhead continuously at certain times of the day. I have seen no evidence of noise meters or soil assessments. The planes overhead cannot be good for children or other living beings. The loss of instructional time, because the noise of the planes are so loud that you have to stop talking, is concerning to me as an educator and child advocate. Why are 75% of all flights leaving DCA northbound? Why are they not over the river? The reason we have been given has varied. First it was a new flight pattern for efficiency and less carbon emissions. Next it was the secret service required it for security. Flights in NYC follow the east river and the UN is right there so I think the security issue is questionable. It is getting warmer and I wonder if we will be able to sit outside without constant noise and pollution. I worry that quality of life has been sacrificed for the airlines' bottom line. I would be happy to present my concerns to you personally. In the meantime, I would like these new flight patterns halted until environmental (noise, air, water) assessments have been conducted.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>

229	As the Advisory Neighborhood Commissioner for Single Member District 2A04, which extends from the Lincoln Memorial to Rock Creek in the District of Columbia, I am writing to say that I have directly experienced, and heard many comments to the effect, that the recently implemented North bound flight path from DCA has provided some limited relief to DC residents from excessive aircraft noise and pollution. It is also important, as a matter of national security, that the the FAA does not, in the future, redirect planes closer to the Prohibited Zone, as they did in 2015, without any public notice. This appears to be at least a partial correction of that ill advised move and as such is welcome by all impacted residents of the District.	Comment noted
230	I support the recently updated "HOLTB" DCA flight procedure which moves the ADAXE waypoint 784 feet to the southwest and renames it REVG. This move is consistent with national security concerns, as expressed by the Secret Service, and community concerns regarding noise under the north-flow patterns. The novel HOLTB modifications are beneficial to nearly all constituencies as the traffic is moved to more closely match the Potomac River's airspace.	Comment noted
231	I am a resident of the Palisades area of DC and very much in favor of the proposed rerouting of air traffic. The current flight patterns have an adverse impact on the Palisades area of DC. Even with newly replaced windows in my home, under certain weather conditions the sound INSIDE is disruptive. Outside under any conditions, conversation in normal tones of voice have to pause when a plane passes overhead, which happens every few minutes. The sound is deafening at times. Importantly, the Palisades is home to a number of populations that deserve special protection. The area has an unusually dense concentration of educational facilities. There are four schools within just a few blocks of my house (River School, St. Patrick's, Our Lady of Victory, the Lab School, and the George Washington University Mount Vernon campus) and more (Key, Georgetown Day, Field) just a short distance away. The Palisades is also an access point to the recreational benefits of the C&O canal towpath, Capital Crescent Trail, Fletcher's Cove, and the Glen Echo Trolley Trail; and the wildlife and ecosystems in these preserved lands. Thus, the noise and risk is imposed on the residents, users of National Park land (both human and otherwise), and high concentrations of children. This densely populated area also houses many businesses and public facilities (library, fire house, post office) and two major hospitals (Sibley and Georgetown). While the airport's impact will necessarily fall somewhere, the density of this neighborhood, and the special considerations for protecting children, ecosystems, recreational areas, and other sensitive populations, argue for moving the flight paths away from the Palisades area of DC.	Comment noted
232	I am in support of the new flight plan recommendations made by the secret service.	Comment noted
233	Please implement the new FAA Flight Procedure - HOLTB - it is making quality of life much better for those of us who live close to the Potomac River and hear the engines of planes flying overhead all day long.	Comment noted
234	I live in DC in the Palisades the airplane noise over the last 2 years has gotten appreciably worse. Not only are there more planes, but the hours they fly keep getting extended. I do not understand why the FAA has changed flight paths like this to the point where I literally feel like I live at the end of a runway, all the time. Please spread out the pain and constrain the hours. The FAA says they are listening, but its actions and events over the past few years say something consistently differently. FAA actions to DC concerns - screw you we don't care and we WILL shove this down your throat.	Comment not directy relevant to the proposed project.
235	On advice from the Secret Service, the new FAA Flight Procedure - HOLTB - should be implemented	Comment noted
236	We live on the DC side of the Potomac River parallel to MacArthur Blvd. We can't even open our windows on nice days because the plane noise leads to talking too loudly or not being able to hear the tv without making it extremely loud.	Comment not directy relevant to the proposed project.
237	The planes are very loud over NW DC, and it is disruptive to everyday life.	Comment not directy relevant to the proposed project.
238	I live in NW DC and my children sometimes refuse to play in the backyard because the planes hurt their ears. I am in support of HOLBT.	Comment noted
239	I am in FAVOR of the new FAA flight procedure - HOLBT. Planes currently fly directly over my house and very low. I can see their numbers clearly. Who needs an alarm when the plans start over the house, sometimes before 6am and don't stop until midnight and sometimes later. Come in stay awhile here and hear for yourself. Please, implement this plan for the sake and sleep of my young family.	Comment noted
240	I support the proposed HOLBT. The planes fly incredibly low over my house, which is by the German embassy. American Airlines is the most flagrant offender of not staying with the river, by the way.	Comment noted

241	This morning, south bound planes flew over our neighborhood at 45 second to 2 minute intervals consistently beginning at 6:30 AM. The change says Northbound planes but planes in both directions now fly directly over our residential neighborhood. This is disruptive to family life and the environment. Please extend the comment period while all of the greater DC area fights the impact of the coronavirus. There is no way to organize community meetings to fight this Secret Service change of flight plans during this time. The planes are going to lower property values and disrupt the fragile evosystem of this area.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, Scope of the Proposed Action, Impact of COVID-19, and Results of HOLT B.
242	Please give us along the Potomac in DC a break. I can not live with my windows open; cannot enjoy my back yard, cannot year myself think when huge planes constantly buzz my house. I am elderly and this has so negatively affected my ability to enjoy my remaining years. We have endured enough. Time to better share the pain of having DCA so close.	Comment not directy relevant to the proposed project.
243	Recent air traffic out of Reagan National Airport (DCA) has become disruptive and unsafe for people and wildlife in the region, including no-fly hours as well as being too low and too frequent. With rare exception, flight paths into Reagan National Airport should be over the wider portion of the Potomac to the south and there should be fewer flights allowed. Dulles (IAD) is supposed to be the primary carrier out of the nation's capitol. Reduce the number of flights at DCA, enforce nighttime no-fly hours between 10pm and 7am, and route arriving planes over the wider southern portion of the river. Furthermore, airplanes should not be permitted to go into a holding pattern over the densely populated Washington DC region.	Comment noted, refer to Topical Responses for Noise.
244	I live along the river and am routinely affected by flight path noise. The 2015 change to NextGen was far more impactful; flight paths are now lower and more concentrated creating noise at disruptive levels, frequently every 60 seconds. This affects a few folks on both the DC and VA sides a lot and those voices have not been heard. The selfishness of this debate is disheartening. Although this HOLT B change moves the waypoint slightly, I have not noticed any change to the noise level I experience daily and the flight paths don't really look much different frankly. I support our members of the secret service who wish to reduce incursions by moving the waypoint a few hundred feet. In summary, I support the Secret Service request to move the waypoint.	Comment noted
245	As a 40-year resident of Foggy Bottom, which has been one of the DC neighborhoods adversely affected by the marked increase in traffic to and from National Airport during this time—I agree with the new FAA Flight Procedure—HOLT B—and would like to see it implemented.	Comment noted
246	The current flight plans bring planes over my house approximately every 20-30 seconds starting in the early morning and into the late evening. The planes are flying quite low and the noise is disruptive, particularly when outside. It impacts myself and my family and has an impact on my property value to potential buyers.	Comment not directy relevant to the proposed project.
247	As an outsider of aircrafts science, it's hard to understand what will be the impact of the change on our residence area in Cystal City and Pentagon City? Can you please share a map or any visual drawing indicating the current and proposed new air path?	Comment noted, refer to Topical Responses for Section 106.
248	I am writing in support to change the airplane routes west of DC. The planes are flying too low, close to my home— creating noise and disturbance in my home.	Comment noted
249	I am writing in support of the plans to change the airplane routes west of DC. The airplane noise have disturbed my family's lively hood.	Comment noted
250	Noise? P-56 airspace incursion? Please let us pray these aren't the actual concerns. I lived in an airport hangar for two years and felt safer than I do living adjacent to the Key St Bridge. Things to consider: 1) military helicopters that fly formation less than 200 ft from major structures, ie marriott hotel or meridien; 2) does faa know about construction plans for more high-rise complexes directly in the flight path; 3) thousands upon thousands of crows flocking over potomac from georgetown to rosslyn every evening in the summer; 4) lack of community plan for the next air florida event; 5) juxtaposition of a no-fly zone within stones throw of major glide path, because really. Come on guys, lets try to get FAA back on the path to credibility	Comment noted
251	Please keep the flight path into Washington Reagan along the Potomac and not in the District of Columbia	Comment noted
252	I support the modification of the FAA flight pattern.	Comment noted
253	In support of HOLT B. Will greatly enhance the security of our community	Comment noted
254	in favor of the new FAA flight procedure - HOLBT	Comment noted
255	The plane noise is such that one must stop conversation while planes are overhead . There are more very noisy planes late at night recently.	Comment noted
256	My house has been on the flight path for a long time. Any improvement by moving the flight path towards the VA side (with less housing density!) is welcome! Please consider a higher flight path as well and any other measures that lower airplane noise.	Comment noted

257	I live in the Palisades area of NW DC along Canal Road and do not want to incur more loud airplane noise. I have lived in this house for 25 years, and do not want the flight path to get closer to the DC side of the river. Already the time window and amount of flights has grown, which is an intrusion. Please either lower the number of flights or keep to the center of the river.	Comment noted
258	We are strongly in favor of keeping the new FAA flight procedure - HOLBT. Our area has been unfairly impacted by DCA flights for the last few years and it is time for this more equitable and safer solution.	Comment noted
259	At 2:07 PM ET on March 9, 2020, there was an extremely loud airplane flyover. It shook the whole house for several seconds, and was loud enough I was worried my napping baby would be awakened. We live in the Virginia Square neighborhood of Arlington, VA. I'm not sure whether this was an impact of the new north-bound departing flight procedure (HOLTB) at DCA that went into effect on January 31, 2020, but in any event, it was a very loud disturbance.	Comment noted, refer to Topical Responses for Noise.
260	Please do not allow planes to fly closer to DC or more frequently	Comment noted
261	A plane flew over my house in the past few days at a very low altitude to the point that it rattled my windows. Please move this flight pattern.	Comment noted, refer to Topical Responses for Noise.
262	I've lived here since 92'. Used to think watching planes from my roof, in the evening, was romantic. And through the 90's flights seem to stop before 12 pm. I noticed, about 2004, that noise seemed to be increased, planes coming in lower, over the house, more planes added as the airport got larger. Even helicopter action seems to be lower and louder as well. And now, 2020 its a source of stress. flights are constant, and very low and loud, right over our house. You can hear the 'ding' the plane makes as it nears landing. Pretty awful how late they fly in and continue and into the morning- It's not unusual to be awakened to a planes overhead rumble at 2 am.	Comment noted, refer to Topical Responses for Noise.
263	The planes start regularly at 6am sometimes as early as 5:30am. They are very low to the ground as we can smell their fuel at time. Please change this noise pollution so that we can enjoy peace	Comment not directy relevant to the proposed project.
264	We are totally in favor of the HOLBT plan. As part of the Palisades Kent neighborhood for over 10 years, we and our neighbors have struggled with the impact of increased air traffic noise in our area. Please continue to work on plan to move air traffic over the River, not the neighborhood.	Comment noted
265	My family agrees with the new FAA Flight Procedure - HOLTB - and supports it being permanently implemented	Comment noted
266	As a resident of my current home for some 30 years, I strongly urge that the flight patterns for DCA remain in the current Secrete Service supported routes. Under the previous configuration, there were once-a-minute overflights of my home, over schools and churches with aircraft DIRECTLY overhead at about 1,500 feet. The river route is safer and less disruptive.	Comment noted
267	I am writing to support the proposed new FAA flight procedure (HOLBT), moving the flight path closer to the VA side of the Potomac River as per the Secret Service request and the request of the Palisades Community.	Comment noted
268	I am in support of the FAA flight path change along the Potomac River.	Comment noted
269	My family is in support of making permanent the temporary changes currently in place for flights coming into and leaving Reagan National Airport, as requested by the Secret Service (HOLTB). MANY planes fly directly over our home that are supposed to be over the Potomac and the noise is overwhelming and problematic...including most of this past weekend.	Comment noted
270	As a 30+ year resident of North Arlington, we expect and live with airplane noise. However, the new northbound departure flight path dramatically increases the noise. We did not have an opportunity to provide input on this significant change. We object to the change.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
271	I support the new flight path for security reasons and also for noise abatement reasons. The security issues are important. In addition the aircraft noise over our home has increased in recent years and become intolerable, as many planes do not observe the correct path and fly directly over our home. This is damaging our sleep and property values. Thank you for listening.	Comment noted
272	I have filed numerous complaints about aircraft noise from planes departing/arriving at Reagan National over the years. But the situation is MUCH improved now that the flight path has been changed. Please keep it up!!	Comment noted
273	This is a very welcome change that will bring some of the noise to a relatively less densely populated area and address security concerns at the same time. Hard to object to it.	Comment noted

274	Pls continue the current flight plan. For the first time in the 20 years I have lived here, I am not having to stop talking mid sentence to wait until the plane has flown overhead.	Comment noted
275	I oppose the change in the flight pattern to Reagan National Airport that has been requested by the Secret Service.	Comment noted
276	I misunderstood the change. We support moving the path away from DC to help mitigate the noise in DC (understanding it's for national security concerns).	Comment noted
277	The proposed route change makes total sense from every point of view. I and my whole family support the proposal. The proposal is a win-win-win: - Security is increased near the White House - Close-by neighborhoods like mine in the Palisades benefit from lower noise - Close-by neighborhoods in Virginia benefit by continuing their easy access to Washington Reagan Airport with no measurable difference in predicted noise levels. I have lived in my Palisades neighborhood for 30 years and have co-existed with air traffic noise the entire time. It has gotten progressively better over the years. This proposed change when implemented will make living in DC even better, with no discernible difference elsewhere. Please mark me down as TOTALLY supporting the proposed change. Thank you for considering my comments and for considering all others as well.	Comment noted
278	As we live on Potomac Avenue, NW, the street closest to the Potomac River, and descending planes ROUTINELY FLY DIRECTLY OVER OUR HOUSE AND NOT THE PROSCRIBED RIVER FLIGHT PATH, we are favor of the new FAA flight procedure - HOLBT.	Comment noted
279	I support moving the flight path towards the Virginia side of the Potomac River. Since people on either side of the river will be affected by the noise, the security issue should take priority.	Comment noted
280	The airplane noise is constant. We support efforts to change flight paths away from our homes in Washington.	Comment noted
281	I strongly favor moving the DCA flight path west and over the river. Apart from national security considerations related to air space around the White House and other critical national installations, I have never understood why the FAA insists on flying planes low over all the neighborhoods on the western side of the Potomac River. Wouldn't a flight path over the river make a lot more sense from a safety and noise mitigation point of view?	Comment noted
282	I'm in favor of the new FAA flight procedure - HOLBT. We hear planes endlessly fly over our house all day long.	Comment noted
283	We are particularly supportive of the proposed plan by the FAA to alter the flightpath into DCA, shifting traffic 700 feet towards the VA shore. Air traffic deviates from the Potomac River on a regular basis, sending low flying planes directly over the tops of our houses in the Palisades. Anything that can be done to move the traffic closer towards the Potomac or the VA shores of the Potomac would be greatly appreciated.	Comment noted
284	The frequency of planes disrupting the sleep of my family is now a daily occurrence.	Comment not directly relevant to the proposed project.
285	The flight paths that had been previously been operating from DCA not only create unnecessary safety risks near the protected zone but also create untenable noise for the Palisades neighborhood in NW DC. I have a 13 month old who goes to bed at 8pm and is woken up 2-3 times an evening before midnight (when flights more or less drop off) due to outbound and inbound plane noise, now that flights to DCA are (i) larger planes (ii) flying closer together. Please consider instituting further changes for both inbound and outbound planes, as citizens' health is at risk.	Comment noted
286	I am writing as a resident of the Palisades community in Washington, DC. I am in favor of the new flight pathways to DCA that take planes closer over the Potomac River. For the last four years that planes have been flying directly over this neighborhood I have noticed a tremendous increase in the noise level. When a plane is overhead, it is almost impossible to keep a conversation outside. I have appreciated the time limits that seek prevent most flights from landing after midnight and before 6 am. Please continue with this new flight path for the safety and well fair of our community and the safety of the Restricted airspace in Washington DC.	Comment noted
287	Please keep the planes over the river and not over our palisades neighborhood!	Comment noted
288	Please keep the planes away from the Palisades - extremely disruptive!	Comment noted
289	I live in the Palisades neighborhood of NW DC. As fun as it is to see my house from the airplane when flying into DCA, the noise from the ground is extremely disruptive, often waking up our children and causing our dog to bark. The approach flight plans for these aircraft should be moved further south, closer to the actual airport.	Comment noted
290	For years my neighbors and I have suffered from loud noise as airplanes fly overhead. At times, my windows rattle. I have to pause and/or mute conference calls until I can hear again. Any steps that reduce noise levels over the Palisades is welcome.	Comment noted
291	Planes have been flying over DC rather than the river. Noise is very loud. Moving flight path closer to Virginia will be best for everyone. Southbound approaches are consistently flying very far into DC, often east of MacArthur Blvd.	Comment noted
292	Planes are terribly noisy as they fly over the Palisades and Kent neighborhoods in DC. No matter what the weather, no matter what the time of day, they are very loud and very low. They should follow the river and stay away from our communities!	Comment noted

293	HOLTB should be made permanent. Living along the river in DC we take the full brunt of DCA departing and arriving flights, right on top of our neighborhood. The noise, vibration and disturbance to our lives is non-stop. This is an unhealthy and environmentally damaging situation. Changing the flight path to take some of the traffic to the Virginia side is needed to improve the quality of life in DC and to share the burden of this public nuisance. For too long there has been an inordinate burden on DC residents with the vast majority of flights (arrivals and departures) flying over DC. It is time Virginia shares the burden in order to lessen the negative health and environmental impact on DC and its residents.	Comment noted
294	Good morning. Mine began with an airplane takeoff that awakened me. This isn't unusual. When the wind is from the south, planes that used to fly over the middle of the Potomac are now flying along the VA shoreline, sometimes over it. Some fly over before 6:00 am! We didn't hear the plane noise inside our homes when they flew over the middle of the river. Now we hear every one. I've heard two since starting this note. Please restore the flight path to over the MIDDLE of the river until planes reach the Woodrow Wilson bridge, where they will be at altitude.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
295	The noise from the unaltered DCA flight path is borne by the families that live in the Palisades neighborhood. On most days it is an incredible nuisance. On the worst of days it is completely unbearable. This is an opportunity for the FAA to remedy the grossly inequitable situation and shift some of the burden elsewhere (I write as yet another plane flies overhead) — please do so.	Comment noted
296	I support the proposed HOLTB air traffic control change. Aircraft noise is a disturbance to all who live under the flight path. The fairest path for everyone is for aircraft to follow, as closely as possible, the path of the Potomac River. Requirements imposed by the secure area of the no-fly should be layered on top of that.	Comment noted
297	We are IN FAVOR of the new FAA flight procedure - HOLBT.	Comment noted
298	I am in support of the FAA moving the flight path which will reduce airplane noise in Palisades DC	Comment noted
299	The noise of the aircraft flying over my house at times has awakened my children, shaken pictures off the mantel, and makes conversation outside our home impossible at times.	Comment not directly relevant to the proposed project.
300	Palisades has absorbed tremendous amounts of noise for years. Please follow the new FAA guidelines.	Comment noted
301	Please go forward with the new FAA flight procedure - HOLBT. I am totally in favor of HOLBT.	Comment noted
302	The recently changed flight plan is a substantial improvement. The noise caused by flights over my house is now much less disruptive. Previously you could not hold a conversation in my yard (or immediate neighborhood) while planes flew overhead and they started before 6am, sometimes coming only a few minutes apart, until 11pm or later.	Comment noted
303	I strongly support the new FAA flight procedure for DCA. The noise has become intolerable and it is impossible to speak on the phone when planes are flying overhead. Planes also wake me at 6 am every day. Noise a lot worse since flight paths were changed and it was already very disruptive.	Comment noted
304	I am in favor of the new flight procedure provision that directs flights farther from DC. Noise from airplanes flying above my house has been a huge nuisance and burden for my family, especially on my young children's sleep. I also agree that the flightpath should be changed per the Secret Service's recommendations.	Comment noted
305	The amount of air traffic and noise is ridiculous. Within a 10-20 minute period on just one Saturday morning we had a flight coming over every few minutes. I was trying to sleep in, but it was very disturbing so I could not. This is noise that we hear regularly especially since planes are not deviated on multiple flight patterns and are concentrated on this route and are flying over the same parts of arlington continually. If we are trying to enjoy being outside, it is impossible to not have conversations disrupted by the planes flying over head. This has been an issue our community has tried to address and have seen get worse over the years. It is not right that you are not going to consider previous complaints. It is not as if this problem has been resolved, merely gotten worse. Please work to keep our our communities pleasant to live in, these neighborhoods should not have to bare the brunt of air traffic noise.	Comment noted, refer to Topical Responses for Noise and Scope of the Proposed Actions..
306	I am in support of the air traffic procedure change HOLTB to keep our Nation's Capital safer.	Comment noted
307	I have lived in the Palisades neighborhood of Washington, DC, for over 20 years. The airplane traffic and noise has increased dramatically in recent years. The late night and early morning flights are especially frequent, loud and low-flying. If there are even more flights with the new terminal, I'm going to be extremely concerned about even more noise at all times as well as air pollution from the number of flights.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
308	I am very supportive of the proposed flight path change. The proposal does a great job of balancing the different considerations and is a balanced outcome given the different stakeholders involved. We must proceed with this.	Comment noted

309	Woken up the s morning early by them and now they are going in loudly and frequently. Please change the route .frequency and impose some curfews!!!	Comment not directy relevant to the proposed project.
310	As a resident of Palisades - the constant air plane noise has deeply affected our quality of life and that of our young children. We fully support the new FAA flight path, which reduces atleast some of it. We eagerly await for this to take effect.	Comment noted
311	I live near Reagan National Airport in the Potomac Yards neighborhood of Alexandria, VA. I would like to file a complaint about the abundant airplane noise. If there is a way to reduce the amount of flights per day in order to limit the noise, that would be wonderful. More importantly, I would like stricter enforcement of the DCA Nighttime Noise Rule. Flights are not supposed to occur from 10pm to 7am. I frequently hear flights as late as midnight and as early as 5am. Flights absolutely should not be scheduled outside of these perimeters and if flights are delayed or adjusted so regularly, perhaps the "nighttime" should be extended to the hours of 9pm to 8am so that adjustments have some leeway.	Comment not directy relevant to the proposed project.
312	Please change the flight path into DCA. When the ceiling is low, the flights end up flying *right* over our house, often at a low altitude. We can hear the older planes clearly even indoors. It is disruptive to residents and it is unfair that this burden is unfairly put on the DC side of the river.	Comment not directy relevant to the proposed project.
313	I live in Accokeek, Md. The FAA Next Gen system is truly destroying the daily & nightly lives of the Citizens of Accokeek Md, which include children and the elderly. The Nextgen WayPoints have DCA Jet Planes flying directly over homes (@ 3000 ft or less) all day and now late into the night (2:00-3:00 am). Especially the Inbound, North Flow Flights. Children can't play outside, or concentrate on Homework, Elderly are frightened by the Jet Noise, neighborhood Dogs bark and yell everytime the Jets fly over. Among other quality of life Issues it has brought to the Community. Before NextGen, the DCA planes used to Fly over and up the Potomac river which is only a couple of miles over from the WayPoints (and at higher attitudes). This would stop the planes from flying over Homes, Schools and places of Worship. A alarm clock is also not needed anymore because first thing in the Morning there are Low Flying Jets, this is a horrible situation to deal with especially on the weekends. Please help us bring Peace Back to the Community. Either: -Move the WayPoint over non populated route over the Potomac to DCA -Raise the Flight ceiling to a Minimum of 5000 feet & reduce the frequency -Or ideally Both (a fair balance to the Community) Please help, it's becoming very hard on those effected in the Community. We desperately need your help...	Comment not directy relevant to the proposed project.
314	Please move the flight path west of the Palisades. I don't want to move!	Comment noted
315	The NextGen System has caused intolerable airplane noise in our community Accokeek, Maryland (CDP) is located 13 miles south of Reagan National airport. Accokeek (CDP) has a population of over 10,000 people. We the residents of Accokeek would like your help in getting relief from the constant Jet Aircraft noise from aircraft taking the north landing to DCA. The Federal Aviation Administration has created a waypoint (KATRN) located in Accokeek (CDP) Maryland. Aircraft landing at National Reagan Airport steer toward this waypoint and this has resulted in an extreme increase in noise & air pollution over Accokeek Maryland. We live in Accokeek Maryland a community located in the South East part of Prince George's county less than a mile from the FAA waypoint (KATRN).We have lived in Accokeek Maryland since 1995 (22 years). The residents of Accokeek are experiencing intolerable noise due to the FAA NextGen choice of flight paths. When we moved here there was no airport noise. The noise started in 2014 and has gotten worse with time. This increased noise was caused by the FAA decisions to implement the NextGen program. Since Reagan DCA implemented North landing the noise from overhead aircraft is constant from approximately 6 am until 1- 3am. We can hear the noise from aircraft landing at DCA. Frequently we have counted approximately 149 or more, aircraft a day at altitudes of 1,500 feet to 2,500 feet and at a distance .01 miles to 3 miles from our house. Many aircraft cross the river from Virginia, the Aircraft navigate to the (KATRN) waypoint and then circle over Accokeek right or left to line up to go down the river to land at National Reagan Airport. The aircraft slow to approximate less than 200 miles per hour (or less) and descend to approximately less than 2500 feet. Everyday some large number of aircraft arrive from some other direction and travel south then turn around and come up through Accokeek. The aircraft low altitude and low speed increase the intensity and duration of aircraft noise over Accokeek. The constant aircraft noise will lower the property value of Accokeek residences. There is research that indicate low flying jet engine aircraft emissions may affect the health of those in proximity. Especially the young and elderly. We have filed numerous legitimate documented complaints with the FAA. From our research the FAA use complaints to decide where to place aircraft landing routes. But there has been no relief. We have read the press release that discussed a bill passed by congress that directed the FAA NextGen air traffic control system, to act to reduce noise that is impacting Maryland residence. The residence of Accokeek wishes to be included in this remedy to reduce airport noise. The aircraft noise from aircraft approaching DCA to the north is worse than the noise that is experienced by any other area. This was known by the D.C. Multiplex when the decided to establish North landing routes for Nextgen DC multiplex. Please help the residents resolve this dire matter.	Comment not directy relevant to the proposed project.

316	I have lived in the Palisades neighborhood of Washington D.C. near the Potomac River since December 1972. When I first moved here, there were many fewer planes flying overhead, planes flew directly over the Potomac River, and there were no flights between 10 PM and 7 AM. Although plane engines were generally louder in those days, aircraft noise was much less disruptive to our neighborhood because of these three factors. With the notable exception of the several months after 9/11/2001, there has been a gradual shift toward more planes flying directly over our homes over a much longer time period each day. Although HOLT B is a relatively minor shift in flight patterns and it is being done for security reasons, it is a shift in the right direction from the perspective of those of us in the Palisades who live under the flight path of planes going to and from National Airport and are now suffering from almost continuous noise distress due to these planes. Therefore, I hope the FAA will continue the HOLB pattern and eventually look into other changes that will give us more relief.	Comment noted
317	On the morning of March 8, the planes approaching from the north were noticeably load relative to other times. The impact of the change is on the neighborhood is unacceptable.	Comment not directy relevant to the proposed project.
318	I strongly support the amended waypoint for north-flow departures at DCA. Thank you for evaluating it and I hope it is implemented permanently.	Comment noted
319	I am submitting this email to document the effects of airplane noise on our neighborhood in Arlington. My family has lived in Ballston, south of the Washington-Liberty High School, for 20 years. One of the factors that originally influenced the choice of our home was avoiding airplane noise. However, we have recently noticed that airplane noise frequently disturbs us. The list of effects includes: -- Late evening and early morning flights that disturb our sleep, including on weekends. -- Loud volume of flights that seem to be close to our home. The noise penetrates every room in the house. -- Frequent flights that are spaced at intervals of several minutes. -- Flight noise disturbs us in parks or on walks. -- The airplane noise disturbs our child's sleep and his ability to focus on schoolwork. We have considered moving to try to escape the noise. In our opinion, this problem is reducing the quality of life in our neighborhood and could reduce the market value of our home. Please consider taking steps to solve this problem.I have included the Arlington County Board on this email, and wish to express my appreciation for their active involvement in this issue.	Comment not directy relevant to the proposed project.
320	Hello, I am writing to protest the new north-bound departing flight procedure (HOLT B) at DCA that went into effect on January 31, 2020 and respectfully request that the FAA continue to work with Arlington County and Congressman Beyer's office to reduce airplane noise in the residential areas affected by DCA airplane noise.	Comment noted, refer to Topical Responses for Noise and Level of Environmental Review..
321	We have done everything we can think of to be able to sleep and yet we still get planes overhead. We have double glazing, white noise, earplugs and yet the planes disturb our sleep. It is less annoying during the day but it is still overwhelming. I have a friend who lives in the Dover Crystal neighborhood and when we are visiting on her back porch, we can not hear each other speak as the planes go overhead. I understand that they try to fly over the river but we often see them "cut corners" and fly directly over large parts of Arlington. So yes, the noise from the planes is excessive and measures need to be taken to correct this, for our health and well being.	Comment noted, refer to Topical Responses for Noise and Results of HOLT B.
322	I live in North Arlington, near Rosslyn, and I have noticed a recent increase in flight traffic over my home. My wife and I have two children, and airplane noise is already damaging our hearing and sleep patterns. Moving air traffic further to the south only makes it worse. I am writing to request that you undo the recent HOLT B change, and return flight patterns to the way that they were before HOLT B was implemented.	Comment noted, refer to Topical Responses for Noise and Results of HOLT B.
323	Several planes (4) just gone over— totally awake now — it's Sunday morning !! Just after 6am I say again—need more restrictive curfews and take the route away from directly over houses here in foxhall village — go back to over river route	Comment not directy relevant to the proposed project.
324	Plane just gone over — I'm awake — it's the middle of the night —need curfew and old over river route back Added address to make sure you know what area is most affected by this — planes very noisy here	Comment noted, refer to Topical Responses for Noise and Results of HOLT B.

325	<p>Suddenly and without any notice or community approval, in August of this year very low altitude, long haul commercial aircraft began landing and taking off over our neighborhood in Fairfax County, Virginia. The jets are so close we can clearly tell what carrier owns the aircraft simply by looking out our bedroom window. A new jet appears every ninety seconds, approximately seventeen hours per day, seven days a week. Each day approximately seven hundred jets skim our home. The planes have been re-routed from areas previously approved for commercial aircraft flight paths. And now, we, through no action of our own, and without our involvement or approval, must suffer as over forty planes an hour screech overhead. I am writing requesting your help in abating this nuisance. And I'm hoping you can help me better understand how something so critical as the re-routing of a major commercial flight path could happen without our knowledge or involvement. My family lives in Reston, Virginia (1466 Waterfront Road, Reston, VA 20194). Starting in August of this year, the piercing whine of large commercial jets began jolting us awake each day around 6:00 a.m., continuing through late evening (approximately 11:00 p.m.). The noise is significant. It is clearly audible inside our home. There is no way to avoid it. Closing the windows and doors and drawing the drapes does nothing. Some of the larger and lower flying aircraft cause our home to shutter. The noise is also incessant. The scream of one plane overlaps another, such that during the day our home is bombarded with approximately seventeen straight hours of piercing jet noise. The planes are so close and so loud that it makes it difficult for my family to fall to sleep in the evening and it makes it difficult for us to concentrate and/or to relax during the day. Since the planes began buzzing our neighborhood, our mental health has suffered, and we have been more prone to physical illness. In short, the near constant jet noise has shattered the tranquility that has made our house our home. In addition to the physical and psychologically toll this has extracted, I strongly believe the market for our home will materially suffer, and that our community will become economically depressed. Reston is known as a peaceful place to live. Now, it will be known for the near constant jet wash caused by the parade of low flying, long haul aircraft. I believe this new aircraft traffic pattern was triggered by the Federal Government complaining about the prior landing pattern resulting in increased incursions into restricted airspace. This as a valid concern. But it must be balanced against competing community interests. The remedy must be carefully considered. It is inexcusable to simply re-route air traffic without community input and involvement, as I believe is the case here. This is a classic nuisance. Significant air traffic and noise has descended upon our community through no fault of our own. It came to us, not us to it. It is very disruptive and constant during waking hours and is materially harming the physical, psychological and financial interests of innocent area residents. I implore you to take aggressive action to halt the noise pollution that is eroding our community. We think it appropriate that the flight path be re-directed with additional restrictions to limit security concerns, that we establish an operational airport curfew, maintain effective altitude limits for departing and approaching aircraft, and restrict plane size and aircraft noise level limits. But most importantly, we think it crucial to institute a process whereby the local airport is not allowed to change its noise footprint without any community involvement and approval. I hope the FAA shares my concern. With your leadership I believe we can successfully navigate this issue and emerge with a long-lasting and mutually beneficial partnership with our local airport.</p>	Comment not directly relevant to the proposed project.
326	<p>I was dismayed with the hasty manner in which the new DCA north-bound departing flight procedure was implemented. As a concerned citizen and a private pilot, I understand the need to expand P-56 to help avoid enemy air attacks on federal buildings. I don't think that was happened with the January 31, 2020 implementation of the revised DCA arrival and departure corridors, I urge the Secret Service, the FAA, our county governments and all other concerned entities to meet and work out air revised corridors that are an optimal compromise for safety to our federal government, expeditious traffic flow and minimized noise to surrounding neighborhoods.</p>	Comment noted, refer to Topical Responses for Need for the Proposed Actions and Results of HOLT.B.
327	<p>I don't think the noise from DCA is a problem. People just like to complain. The economic and mobility benefits for millions of passengers are greater than relatively free people who don't like noise. However, the FAA should look into flight paths to see if safety can be balanced with noise so that they complain less.</p>	Comment not directly relevant to the proposed project.

328	<p>I am writing to register my complaint and those of my neighbors in Waycroft-Woodlawn Civic Association in North Arlington. Your changes to flight procedure for air traffic coming into and departing DCA has resulted in flights directly over the area of our civic association in North Arlington. I have read the materials published by the Arlington County Government concerning the 'operational change' and believe that they have registered their concerns as has our Congressman, Don Beyer. Despite concerns registered by the USUSS and the FAA, neither of which seems to have taken into account the population density, I see no reason to reroute flights over this area in flying east of central DC government buildings. You are certainly aware of the amount of carbon pollution emitted by planes and its deleterious impact on the environment and the people living in that path. In the case of Waycroft-Woodlawn (as in the case of neighboring residential areas) that is approximately 2,500+ people in 600 homes. In the case of neighboring Ballston, several thousands of residents are living in high rise apartment buildings there. You are also no doubt aware that flying over residential areas, whether in planes or helicopters, creates a hazard to the safety of the general population, not unlike the hazard it risks if they fly over the White House or the Capitol. We do not want to take those risks in any US populated area, which is why flight paths have traditionally been over the Potomac River and non-residential areas. Further, I would like to call to your attention the regular and unwelcome low-flying planes over North Arlington. For instance and specifically, let me call to your attention 3 recent flights over our neighborhood on Thursday March 5 between 11:45 pm and midnight. Today, Saturday March 7, we were awakened by such a flight at 5:15 am. What is completely unacceptable is that these flights, whether emergency or for other purposes, should and must be directed over the river if it is deemed necessary that they land in DCA. The ever-increasing number of military helicopters over this area is unprecedented as well, but I believe that you do not have jurisdiction over those often low-flying and always noisy and dangerous flight paths. If you do, please note our concerns. Thank you for your attention. I will ask our neighbors to send their concerns directly to you, though we are all busy people and not in the habit of having to make complaints in order to bring reason to policy decisions.</p>	<p>Comment noted, refer to Topical Responses for Noise, Air Quality, and Results of HOLTB.</p>
329	<p>The challenge of DCA is that it is surrounded by land use which is inherently incompatible with a large airport. This includes the national mall and monuments, offices of government, and nearby residential communities. It is important that DCA's impact be carefully managed to keep this inherent conflict in a balance between the needs of aviation services and everything else. The proposed adjustment to flight paths to avoid P56 incursions is highly necessary in this regard. I therefore fully support the change. It is also important to note an acute need to better manage DCA's impact on residential communities in a similarly active fashion. The present level of operations out of DCA, the hours of those operations, and the impact of those operations on nearby communities is at an unsustainable level. I would therefore urge the FAA and our elected leaders to take action in reducing DCA's role in the region's aviation network and to rebalance demand and supply towards airports that are not characterized by such extreme conflict with local land use. Thank you for your consideration.</p>	<p>Comment noted</p>
330	<p>Airplanes woke us up this morning. We started hearing them at 7 and they have been flying over every one to two minutes. The noise and recurrence is excessive.</p>	<p>Comment not directly relevant to the proposed project.</p>
331	<p>I have been living in my house in Clarendon Va since 1988. I have never been more mad than I am now at the great increase in airport noise over my house. The past few mornings I have been woken up at 4:28 a.m., 5:39 a.m. and 5:49 am. by overloud jet noise. The jet noise does not stop for several hours. Tonight at 7:30 p.m. I took the trash out and I hear the same loud jet noise I hear in the morning. This noise is very disturbing. It is like Chinese water torture. I request the FAA reroute these jets that fly over north Arlington to the same flight path that they have flown since I have been here since 1988.</p>	<p>Comment noted, refer to Topical Responses for Scope of the Proposed Actions and Results of HOLTB.</p>
332	<p>Why was there no Community Involvement posting when the approach and departure changes were made into and out of DCA after NextGen in 2015? As homeowners of Alexandria and constituents, we are asking for your support to have move the flight route back over the Potomac instead of over our home and our neighborhood. In May 2014, we moved to Villamay in Alexandria after years of saving and researching neighborhoods for our family. However, our joy of homeownership has now been quashed with the relentless, intolerable airplane noise that is now heard both inside and outside our home 24/7 due to the flight path changes in 2015. The quiet neighborhood now experiencing decibel readings in the 80's on an ongoing basis. We are also experiencing a high volume of noise during the purported noise restriction hours of 10 pm and 7 am. We invite you to our home to experience the ceaseless noise that we are now subjected to on a daily basis. We believe home ownership is one of the bedrock cornerstones of the economy and thriving communities. Please make our neighborhood and community a higher priority than airline profits. Thank you for your consideration and please feel free to contact us if we may be of assistance in any matter to revert the flight path away from our neighborhood. Please note Don Beyer's letter regarding this issue - https://beyer.house.gov/uploadedfiles/letter_to_faa_re_p56_changes_10.24.19.pdf along with the storyboard on this - https://beyer.house.gov/uploadedfiles/letter_to_faa_re_p56_changes_10.24.19.pdf along with the storyboard on this issue http://houseofreps.maps.arcgis.com/apps/MapJournal/index.html?appid=04b6ea5feb1e4b61b8bb4be439bd882b</p>	<p>Comment noted, refer to Topical Responses for Scope of the Proposed Actions.</p>

333	<p>Re: DCA-P56 I am opposed to FAA's proposal to permanently implement the HOLTB departure procedure in effect at DCA since 2019. This proposal, which is justified on undocumented Secret Service allegations of airspace incursion into DC prohibited areas, has resulted in increased aircraft noise in my neighborhood in North Arlington, VA. This, together with the ongoing and dramatic increase in DCA nighttime operations in the 30 years that I've lived in my home, has resulted in loss of quality of life for me and my family and a loss in monetary value of my home. This is value that has directly transferred to the airline industry and the MWAA with no compensation given to homeowners like my neighbors and me all along the river in Virginia, DC and Maryland. Just last night, a succession of 5 flights departing DCA northbound between 11:30-11:40 PM flew over the edge of my neighborhood and likely violated the nighttime noise rule as it applies to maximum decibels. This is a common experience. FAA's decision to move waypoint ADAXE 784 feet SW to point REVGE essentially moved departure traffic over the Virginia shoreline, closer to Arlington Cemetery and my historic neighborhood of Maywood. FAA made this decision based on a letter from the Secret Service complaining about airspace incursions near the White House and the Naval Observatory without offering a shred of evidence as to the number and frequency of such alleged incursions. Even if such incursions exist, there is no evidence to suggest that moving the entire fleet of northbound departures farther from the restricted area will result in no further incursions into that area, which if they do occur are likely incidental. I urge the FAA, before making a permanent flight path change, to request evidence from the Secret Service as to such alleged incursions. If there is such evidence then the FAA should present the evidence that suggests how moving the waypoint 784 feet closer to Virginia homes will actually curb those incidental incursions. In the meantime, I urge you to withdraw the departure change pending further examination of the issue. I was a Senate professional staff person involved in the 1980's legislation that created the MWAA and which essentially rescued DCA from oblivion. We thought then, and it has proved to the case, that the subsequent investment in DCA would result in a transformed public nuisance of an airport, vastly benefiting the airlines more than the traveling public or the devalued citizens who live under it's flight paths. Our concerns were prescient, and its unfortunate that the FAA can't seem to strike a balance among all the competing stakeholders that doesn't always screw the homeowners.</p>	<p>Comment noted, refer to Topical Responses for Need for the Proposed Actions and Results of HOLTB.</p>
334	<p>The aircraft flying over Arlington, VA now are not only a new noise hazard but a very big safety issue. The aircraft need to be back over the middle of the river to reduce noise and provide for more safety. 2. This new routing puts Arlington County residents directly under the most noise path and the Rosslyn residents directly under the aircraft. 3. Has an EIS or EAS been done? If not, why not? 4. There is no real valid reason, operational or otherwise, for this procedural change.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
335	<p>We live in the Aurora Highlands community right next to the airport. We obviously knew the airport was nearby when we purchased the property and we know the airport would bring with the uber lot traffic and car traffic; these were things we could live with. The redeeming point was that we weren't able to hear the airplanes, we could never tell. However this has changed. I am being woken up countless times in the early morning hours from airplanes. It feels like they are flying right above us. THIS IS NOT ACCEPTABLE. The noise is loud, disturbing and constant 5:30/6:00 am to around midnight every night. I, and every other community member, should not have to live like this. Again, this was not the situation when we moved in and I dont appreciate the sudden change, distributing all the residents in the area. We already put up with with the airport uber traffic. I request to change the flight routes BACK to the way it was before. Be considerate of all the hardworking people living in the communities near by.</p>	<p>Comment not directly relevant to the proposed project.</p>
336	<p>Directly overhead!! Please go back to the old river route and enforce realistic curfews (like London inner city airport)</p>	<p>Comment not directly relevant to the proposed project.</p>
337	<p>We have lived in our home for over 10 years. Our home is approximately 0.3 miles from the Potomac (approx 4 blocks as the crow flies). The new flight path has noticeably INCREASED noise levels considerably. Flights appear to be flying lower and closer to our homes. The noise level is MUCH higher. For example, we now have to stop our conversations entirely when any plane flies over. The nighttime noise is louder and disruptive. The problem worsens during overcast and inclement weather, when the planes fly lower and louder. In the mornings, the noise is non-stop, as airplane traffic is constant and excessive during the hours of 6am and 10am. Sleeping past 6am on the weekend is impossible. The pattern repeats at other peak hours during the day. We are no longer able to enjoy the outdoors due to the airplane noise. We can't keep our windows open due to the excessive airplane noise. I work from home and the noise impairs my ability to conduct business on the phone. Silence is now gone from our life; the new normal is waiting for the gaps in airplane noise so we can talk to each other. This program appears to benefit the airline industry at the direct cost to the community. This study completely disregarded or misstated the impact to the surrounding community. I respectfully request a new, independently funded study of the noise level in the community before this resolution is adopted. If this becomes a permanent path, I will be forced to appeal to Congress and the DC Government for an adjustment to my property value or press for damages. This decision directly impacts our property value and quality of life in our home.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
338	<p>Over the past two months There has been a significant increase in plane noise over our neighborhood (Colonial Village). The planes used to be audible starting around 6 am, but are now audible from 5. The noise is also pronounced throughout the day when it sounds like the planes are passing directly overhead.</p>	<p>Comment noted, refer to Topical Responses for Noise.</p>

339	We are constantly subject to low flying jets in the past 9 months, prior to that it was extremely infrequent. Again today we have had a loud jet flyover at 9 pm on 3/5/2020. My son has trouble sleeping, and we are woken up by jets that fly as late as 12 am and as early as 5:30 am. Whether this is a NextGen issue or something else, I am not sure, but the frequency and loudness are very difficult to process.	Comment not directly relevant to the proposed project.
340	Please add our names to the list of folks who live in Arlington who have been adversely and significantly affected by the change in flight patterns at DCA. We moved here 2 1/2 years ago and noticed the difference right away. We no longer enjoy our time outdoors and we are even bothered by the increased volume indoors, as well. Please return to the flight patterns over the river and stop the new test patterns over Arlington. It's bad enough the way security measures have changed downtown DC, please don't subject us to all of this increased noise over our homes, too.	Comment not directly relevant to the proposed project.
341	I am an Arlington resident, commenting to let you know that I support the north-bound departing flight procedure that went into effect on January 31, 2020. When my family moved to Arlington in 1986, we were well aware that takeoffs from and landings at close, convenient National Airport (now Ronald Reagan National Airport) generated noise. However, that noise has never bothered us, and does not bother us now. We consider the quiet approaches and landings of modern aircraft (much quieter than the DC8s and 727s that were flying when we first moved to Arlington) to be the "sound of freedom." We value our convenient local airport and do not wish to see its operations compromised.	Comment noted
342	The jets are flying more on the Virginia side instead of over the river. I know because I fly it everyday.	Comment noted
343	We live in Chain Bridge Forest in North Arlington. The increase of airplane noise is alarming. We seem to be in a direct flight path to DCA. It is very difficult to sit out on our deck anymore. Please put effort into greatly reducing the noise level. At certain times it is one plane right after another plane. Also very early and late in the day.	Comment not directly relevant to the proposed project.
344	Within the last few days (especially), what appear to be departing commercial aircraft from DCA have been flying low over our home and street, creating noise that arouses residents and their pets in the night and flying sufficiently low over the home at some times in apparent violation of altitude requirements and causing fear that a plane was possibly in trouble. Please do not adopt this route as it disturbs our peace and sleep and impedes on a strictly residential area.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
345	Plane noise has been excessive all day today - latest one flew over my house loudly at 4:03pm, then another at 4:05pm, 4:07pm, 4:09pm, 4:11pm, 4:12pm, etc.	Comment not directly relevant to the proposed project.
346	Low flying plane at 4:15 on Monday March 2	Comment not directly relevant to the proposed project.
347	I am writing with regard to the new HOLTB procedures which bring planes much more directly over my neighborhood in Arlington. Both the number of flights and the hours of operation at National Airport have increased dramatically in recent years. Departures begin in earnest at 5:45 in the morning and arrivals do not end until midnight and after. Clearly, this has an impact on those of us below the flight patterns who cannot now even get a reasonable night's sleep. Moving the flight path closer to Arlington and further from the White House as reportedly demanded by the Secret Service has made our lives even more unbearable in terms of aircraft noise. This change in flight path is absurdly irrelevant in terms of security given that the Potomac River is so narrow and how quickly a rogue plane could cover the adjusted distance. The change demonstrates a lack of respect for the residents of the capital region. If the Secret Service and the FAA were genuinely concerned about security, they would close National Airport altogether as was done for a number of weeks after the 9/11 attacks. Yes, of course, there would be an initial outcry but people would adjust. I respectfully suggest that the negative impact on close-in residents of Arlington far outweighs the nil-to-miniscule gain in security for the White House which we all pay to have protected 24/7 by sharpshooters who should just continue to do their jobs.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
348	The flight path to and from Reagan National Airport must be changed to move further west and over the Potomac River. The current flight path goes directly over residences in northwest DC causing significant noise pollution and environmental damage. It also is more consistent with national security concerns. Those of us living near the river in DC have been inundated with loud noise at all hours of the day and night.	Comment noted
349	As a DC resident in the Palisades quarter, I SUPPORT the FAA flight path change related to the "National Security Request – Amended Waypoint for DCA North-flow SIDS / P56".	Comment Noted
350	I am in support of any flight path change that would provide the Palisades neighborhood some much needed relief from the constant air traffic directly over homes. At 6:00am the planes start and come every 15 seconds. A move in path would be much appreciated and makes sense.	Comment Noted
351	I support the change in the flight path for national security reasons.	Comment Noted

352	I am writing to complain about the change in airplane noise in the last two months in Arlington. I live in Ashton Heights and work from home much of the time. While I am not opposed to some noise, in the last two months there have been days when the noise from overhead airplanes is nearly constant. It wakes me up in the morning, I hear it in the background of all my calls, and it's still going when I go to bed at night. We've lived here for more than 20 years and it used to be that I would notice on days when the planes fly over as that was the exception. Now I'm thrilled when I have the occasional day with no noise. Please return to the old flight patterns. It was much preferable not to have all of this noise pollution from the planes.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
353	We appreciate the new Northbound route proposal and hope the full implementation will happen ASAP! We are currently in the direct flight path in DC, planes fly DIRECTLY over our home (Westhall Dr NW off Macarthur Blvd) when they can easily fly over the river, and the plane noise has only gotten worse over time. They fly way too low, which is scary considering they pass homes and elementary schools. Anything to reduce this noise (moving several hundred feet closer to river) is much appreciated. If it is a national security question, this must continue. If anything, it should move further closer to the river. Also, we would appreciate mandating noise-reducing vortex generators, and departing slower and higher to reduce noise. We hope additional measures will also be taken to reduce noise for all.	Comment Noted
354	This is a complaint about overhead flights on Aurora Highlands neighborhood 1) AT 8:50 TODAY 3/5/2020 A helicopter flew over my house and made so much noise and vibration that I felt it and could hear it even with music playing and all my windows close 2) within 10 minutes a commercial jet flew over the Aurora Highlands park 3) AT 9:40 -and 9:41 - now - I can heard 2 other flight overhead. It is almost CONTINUOUS air flight noise - another now 9:44 This noise is an infringement on my right to have peach and quiet INSIDE my own home, I will not be able to enjoy being outdoors with all the overhead racket, I have submitted other complaints in the past, but I understand that things might be change if you understand the imposition that the air traffic noise is making.	Comment not directy relevant to the proposed project.
355	I am writing this to let you know that the flights that went over the Groveton area from Reagan at 11:21 PM was excessively loud. I saw that this email/s contact method was requested from residents having issues with louder than normal plane related noise complaints.	Comment not directy relevant to the proposed project.
356	I am writing to complain about the increased in noise caused by the changed air traffic patterns at Reagan National airport. As a resident of North Old Town I can attest that the noise from planes taking off over the populated neighborhoods has been very disruptive. It is almost impossible to have normal conversations as you can't hear because of the loud noise of the jets. This is a very active town, people are always out walking their dogs, talking to neighbors and engaging in other outdoor activities. It is hard to understand how loud it is until you actually have to live with the constant roar. And its hard to not get angry when you are woken every day at 6 am from the whining of the jet engines when they begin the day taking off to the south. In short, it is very loud, it has a significant negative impact on the quality of life in our area	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
357	I am a resident of Arlington County, VA. The recent change in flight paths to and from DCA has created excessive and very troubling aircraft noise in our community. I have written to Arlington County government officials on numerous occasions to urge them to lodge complaints with the FAA regarding the recent shift of air traffic over Arlington County. The increase in noise in our community is now intolerable. The shift was immediately noticeable in our Arlington neighborhood. The significant and sudden increase in both noise and vibration from aircraft overhead was immediately noticeable, unmistakable and very troubling. I can imagine that the noise and vibration has been severe and disturbing in many Arlington neighborhoods. Furthermore, the flights continue late into the night and begin extremely early in the morning. Both the noise and the schedule is disturbing to sleep, peace and quality of life. We urge the FAA to reroute planes over the Potomac River immediately, for the health, welfare of children and all residents of Arlington County. Having lived in Arlington since 1997, we have always recognized that aircraft noise is a part of life in the area. The trade-off is one we have accepted over the years as the price we pay for the desirable accessibility of DCA – National airport within county boundaries. However, the latest adjustment of flight paths by the FAA significantly increases the negative impact on residential quality of life for reasons that have not been demonstrated to have merit and have not been subject to an appropriate or adequate environmental and public health review. The FAA should reverse the recent flight path change and return aircraft to a flight path over the Potomac River.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
358	Noise levels sounding from Reagan National Airport are intrusive. The issue is more than mere inconvenience: The consistent disruption of sleep has adversely affected my productivity, and as a result, my livelihood. As an entrepreneur who works from home, conducting business calls is my bread and butter; disturbances from aircraft taking flight and being tested on the ground prevent telephonic communication virtually impossible even with all doors and windows tightly shut. Further I pay premium rent for an expansive terrace that gives view Mount Vernon's tree lined border—prime real estate in these parts. To date, noise levels have intruded on every terrace social event, business and personal, I have held. Again, this adversely ill effects my business and cripples my earned-income potential. The health risk increased noise presents to all is obvious. In addition to audiology concerns, high noise levels are statistically proven to significantly increase stress. In every decision you make regarding Reagan National Airport air traffic and aircraft ground testing, please kindly and strongly consider public safety, local economics, and the Golden Rule.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.

359	Flights are very loud over residence in 22307 tonight. 8:10 p.m. 04 Mar 2020. They seem to be frequent, too low, too loud and not following the river.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
360	The new flight paths are causing tangible, demonstrable and manifest damage to the neighborhood, the community and the environment here. From 7:00 to 8:00 pm on 3/4/2020 there were numerous loud flights that could be heard in my house notwithstanding all the windows are closed!	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
361	I AM IN TOTAL FAVOR OF HOLTB! And while you are at it GET RID OF THE LDA APPROACH.	Comment Noted
362	I have lived in the Clarendon area of Arlington since 1996 and am very disappointed in the recent change in flight patterns. This has changed for the worse the quality of our life and our enjoyment of the natural sounds of our neighborhood. The noise pollution from airplanes prevents us from being able to enjoy our yard and porch, walking our dog, enjoying bike rides, and running errands on foot in our pedestrian-friendly neighborhood. With the river so close, why not keep the planes over the water instead of over established and peaceful residential neighborhoods? It is a lack of respect for residents for the FAA to change the flight patterns decades after DCA opened. Please act like you live here or your mother lives here and disallow planes from flying directly over people's homes, which is precisely what DCA's developers envisioned when they built an airport so close to densely populated downtown Washington.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
363	As long-time residents of the Cherrydale neighborhood in Northern Arlington, VA, we want to express our frustration and extreme annoyance with the increasing level of airplane noise we have been experiencing with the implementation of HOLTB departing flight procedures. The flights are so frequent and the noise level is so intense that it is becoming increasingly difficult to enjoy our garden or outdoor activities. In addition, we are regularly awakened in the early morning hours as planes start flying around 5:30 am, including on Sundays. It is impossible to go to sleep until close to midnight due to the noise of airplanes flying out of DCA in the late evening. The increasing level of noise and frequency of departures severely diminish our enjoyment of our property. In addition to the high acquisition costs of properties in this area we are paying a considerable amount of real estate and other taxes, but the environmental conditions in the area are rapidly deteriorating, including because of the changing flight patterns from DCA, which will end up depressing the resale value of our homes. Consideration should be given to how affected parties will be compensated, and that should be done before such changes are implemented and finalized. We appreciate the opportunity to comment on the change. In summary, we are not willing to put up with this level of noise and air pollution generated by the flights/planes, and strongly object to the HOLTB departing flight procedures.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
364	I been hearing aircraft noise after 10pm. This is disturbing the peace of the evening. I am against the DCA flight plan change.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
365	I support the new FAA temporary Air Traffic procedure change at Ronald Reagan Washington National Airport (DCA) known as HOLTB. It reduces some airplane noise in the Palisades community on the DC side of the Potomac.	Comment Noted
366	My neighborhood is on the route of most of the flights take off from or land at the Roland Reagan National Airport and we are exposed to excessive airplane noise at all hours of flights and air and environmental pollution. We are hoping that flight times and routes are further regulated to respect the peace and cleanliness of our neighborhood if the airport will remain operating in its central location, which is a security and safety concern as well.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
367	I fully support the proposed new restrictions for aircraft that will prohibit planes from flying over the District of Columbia. Moving the flight path further west, not only protects Federal property and persons but also will help noise reduction overall for residents (if planes stay over the Potomac). This makes sense for everyone.	Comment Noted
368	I live in the Villamay neighborhood south of Old Town Alexandria. The plane noise here was non-existent when I purchased my home 7 years ago. Now it is unbearable given planes fly low overhead 20-50 times per day - maybe more - at ALL hours of the day. As a result, we cannot enjoy quiet in our back yard or leave our windows open. I attended a session at DCA 3 years ago and the FAA said it would be corrected in 9 months. It has only gotten worse. Pollution comes in many forms. Addressing one type of pollution without ANY consideration for other forms of pollution is negligent and lacks respect for everyone impacted by your decisions. The FAA needs to make changes so that flight patterns are disbursed fairly and not concentrated over neighborhoods that convenience the airlines and environmentalists. I'd be happy to express my views in person at anytime or sell my house to anyone on the committee making decisions.	Comment not directly relevant to the proposed project.

369	I am a long time resident of the Maywood neighborhood in Arlington, VA. I am writing to you to protest the flight path changes in and out of DC Reagan airport, changes that have exasperated an already problematic situation. Over the years, the number of airplanes and the volume of the airplanes flying in and out of DC Reagan has increased significantly. In addition, flights have started earlier in the day. Again this morning, I was awakened by airplane noise at 5:38 a.m. What makes this more offensive is the fact that airplane noise does not end until after 11:00 p.m. It is virtually impossible to get a full nights sleep which has well documented negative impacts on a persons health. As a result of the increase in airplane noise, I have incurred the cost of replacing windows with double panes of glass and the cost of having to run the HVAC system all year (and the negative impact on the environment of the higher energy consumption). I cannot open the windows in my house without having the airplane noise interrupt telephone calls, which is unacceptable when working from a home office, or drowning out dinner conversation, the radio, and television. I implore you to change the flight path to reduce the noise over our neighborhoods. In addition, I ask that you reduce the number of flights flying in and out of DC Reagan, limit the size of the airplanes/engines to reduce the noise of the airplanes allowed to fly in and out of DC Reagan, and prohibit airplanes departures and arrivals at night so there is at least an 8 hour noise free period.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
370	Congratulations on the new north-bound departing flight procedure (HOLTB) at DCA that went into effect on January 31, 2020. It is important as a matter of national security not to direct planes to fly close to the Prohibited Zone as the FAA did in 2015 without any public notice. I also understand that there has been a slight improvement in reducing pollution over the Prohibited Zone and Capitol Mall, which is important for our tourism business. We are trying to work with our neighbors across Maryland, Virginia and DC to recommend changes in the north bound route from DCA that will reduce aircraft noise for all. Initially, we hope that you will consider some alternatives that have been implemented or recommended in Boston: - Noise-reducing vortex generators: JetBlue was one of the first airlines that voluntarily agreed to try and fly more quietly by retrofitting their fleet with noise-reducing vortex generators, which has had positive results.- Departing slower and higher to reduce noise: Per the MIT study for Boston, "Computer simulations found that a limit of 220 knots turned out to be the sweet spot—that's where aircraft noise equals engine noise. Planes would climb at a slightly steeper rate. With a 30-knot reduction, noise directly under the flight track would decrease by between 1.5 and 5 decibels and the footprint on the ground would get a lot skinnier, sharply reducing the number of people affected. A typical Boeing 737 would burn about seven additional gallons of jet fuel and take about 30 seconds longer to get to 10,000 feet, where planes can accelerate and noise impact dissipates. Massport says 30 seconds a flight won't make a meaningful difference in delays or airport capacity."Congratulations again on the new northbound route from DCA. WE hope that FAA will be introducing noise reduction efforts that will help all across Maryland, Virginia and DC.	Comment Noted
371	The purpose of this email is to complain about the excessive noise of aircraft coming and going from Washington-Reagan airport. Our home is in the flight path of these planes, and we are woken up most mornings, BEFORE 6AM, by aircraft arriving and departing from the airport. We know that the noise is greater in the winter months due to the lack of tree foliage, but it has definitely gotten worse than before. In the Spring and Summer months when we are outside, there are certain times of the day when aircraft are spaced less than a minute apart - impacting regular conversations. I would like to see the current regulations in place be enforced (no flights between 11PM and 0700AM), as well as enacting legislation to make the operators, and aircraft manufacturers, reduce noise. Simple and immediate impacts could be made simply from the money paid by consumers on excessive baggage fees.	Comment not directly relevant to the proposed project.
372	I'm very much in favor of the HOLTB. I would like to see this be permanent.	Comment Noted
373	I am writing to submit a formal complaint regarding the increased airplane noise in Arlington, VA. We live in the Bellevue Forest neighborhood and the airplane noise is a huge issue. I understand the flight patterns to DCA have changed recently and are flying over North Arlington more for FAA reasons. While that would be acceptable during the weekdays, it is intolerable on the week nights and weekends. When we get home from a long day of work and want to relax on our patio or in our bedroom, all we hear are airplanes every 2-3 minutes flying over. It drives my husband so crazy that we have white noise on all the time to drown it out and he often times has to take a sleeping pill because the noise is so disruptive. PLEASE consider changing the flight path to not be over North Arlington all the time. This increased noise really is a huge nuisance and it is not fair to all of us homeowners who have to tolerate it non-stop.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
374	I've been a Lyon Park resident in Arlington, VA since 2009, and wanted to formally submit a complaint on the increased aircraft noise for your consideration. The noise is most noticeable in the early morning and late evening. We have a dog that barks at the noise in the morning, and children who complain about it at bedtime. These are both subjective, but didn't occur before. If there's anything that could be done, to keep the flight paths closer to the river, or at least minimize how far the low paths are moving over the residential neighborhood area space, it would be greatly appreciated.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
375	Here in the Palisades area we welcome the introduction of HOLTB. Several elderly couples live in this area and find that they are getting more sleep with this change which contributes to continued good you health. Thank you for this change.	Comment Noted

376	After years of increasing noise from National Airport (longer hours, more frequent flights, change of flight paths putting flights directly over our house), there is finally a proposed change that can reduce the intolerable noise levels a tad. Thank you Secret Service. While I can sympathize with our Virginia neighbors, it's about time that everyone share the noise burden a little bit more.	Comment Noted
377	My family and I have CONSTANTLY been awakened late at night and early in the morning by passenger jets flying over and near our house at low altitudes. I have filed several complaints through the WebTrak system to no avail. 1) Passenger jets are not supposed to fly past 10PM and before 6 AM, yet I hear numerous planes over my house at all hours of the night. Look at Webtrak and you can see many planes flying throughout the night. Airlines are therefore literally making a profit by keeping my family and I awake. 2) Passenger jet noise has become MUCH worse since DCA allowed flights to and from west of the Mississippi river. Noise was not always a problem with previous flight plans but opening the airport up to full nation-wide air traffic has made the problem MUCH worse 3) I am furthermore concerned about pollution originating from the Jets. One or two a day don't make a difference but dozens and dozens in the same flight path over years and years. I know of MANY families along north Military Road who have contracted rare and fatal forms of cancer, much more than would be expected in the general population. I flew into DCA just last week. As we approached the airport from the rural farmland south and east of the airport, the plane was routed around the ENTIRE city and ended up flying right over my house, downtown Rosslyn and the most densely heavily populated parts of the county. This makes NO sense! Force the planes to land and take off east towards the river and countryside, not towards the urban center of the city	Comment not directly relevant to the proposed project.
378	I STRONGLY SUPPORT HOLT B. PLEASE GO FORWARD WITH HOLT B.	Comment Noted
379	We live approximately one mile from the Potomac River in Arlington, VA. Every airplane taking off up the river flies directly over our home. Every one is a nuisance and a disturbance. As I write this, with the windows completely closed, a plane is flying loudly directly over the house. When we bought this house in 1991, there were far fewer planes flying in and out of Reagan National Airport, and they did not fly directly over our home. The current flight pattern makes our yard intolerably noisy during the warmer months. There goes another plane now. In the few minutes it has taken to write this comment, there have been two planes, and it's like that all day long. Anything that can be done to push the planes back over the river or onto any other flight path would be welcome. Now there is a third plane flying over our home. They fly at low altitudes. In fact, we can often even smell the fuel from them. No one should have to endure this.	Comment not directly relevant to the proposed project.
380	I strongly support making permanent the new traffic pattern I understand is referred to as HOLT B, which moves a waypoint southwest. That new traffic pattern is safer and it reduces noise over homes.	Comment Noted
381	I fully support the FAA making permanent the change in flight paths out of Reagan that would move them 800 feet to the southwest. Right now, we in the Palisades experience far too much air traffic and noise. This small change would not only add security to key areas of government but would give us much needed relief from the constant din of airplane engines.	Comment Noted
382	The recent flight pattern changes at DCA have SIGNIFICANTLY increase airplane noise in my neighborhood. There has been a noticeable increase volume with planes flying close and lower to my home. In addition, where flights used to begin at 6:05 in the morning, there are now flights that take off at 5:40 am and we are routinely awakened by them. This is having a negative impact on the quiet enjoyment of our home. I realize there will always be some noise, but the recent flight pattern changes have had a dramatic impact on noise in my neighborhood.	Comment noted, refer to Topical Responses for Noise and Results of HOLT B.

383	<p>Our entire Lyon Park neighborhood has experienced a significant and at times unbearable increase in noise from the new flight procedures. The constant noise has caused many sleeping issues and great distress to our family. I would respectfully request the permanent implementation be delayed and more research conducted to find a solution that will have less impact on the Arlington community. Specifically, I would like to see the following points considered when attempting to find a solution: 1. The number of incursions appears very minimal over the last 6-7 years. 300 would suggest maybe 1 in 1000 flights? Why would the FAA cause great distress to tens of thousands of residents without first exploring other options. Especially when the frequency of incursions is so little. 2. After reviewing the Tracks, it appears the majority fly to the West of the waypoint or inside the straight line. The FAA has stated a desire to keep flights over the Potomac river but this is not occurring. Anecdotally , the majority of flights I have witnessed are directly over Rosslyn and Courthouse buildings. 3. Mr. Randolph Ales who wrote the original complaint is no longer the national director of the secret service. Has the FAA been in contact regarding recent incursions or lack thereof? Is this still a priority for the secret service? Has the FAA communicated the potential impact to communities vis-à-vis relatively few incursions? 4. Has the FAA considered reducing northbound departures to decrease the probability of incursions occurring. Obviously, the less flights that go North the less chance there will be of an incursion. 5. The FAA has not shared an investigation of incursions with the public. What caused these incursions? How severe were they? The track between ADAXE and REVGE is not a huge difference. Why would this have prevented previous incursions? 6. Why has the public not received flight tracks for 2019? How many incursions were in 2019 following the letter and before new procedures implemented? Has there been other recent changes (outside of flight path) that caused fewer incursions recently? It appears there were ZERO incursions in January when looking at all tracks Many Arlington residents are frustrated the FAA is attempting to permanently implement this change without appropriate consideration of the aggregate benefits and drawbacks. Again, please delay implementation and explore other solutions as outlined above. I appreciate your time and consideration.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
384	<p>I've lived in my house since Apr 2001. Air traffic noise has increased considerably. Used to be able sit in my backyard and enjoy a peaceful weekend. Not anymore with new fight patterns. Plus, the area has become much more dense to change now. I know I live close to DCA, but this never used to be an issue. Go back to the older way where planes had to follow the river.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
385	<p>I live in Harbor Terrace at 603 Bashford Lane which has been significantly impact by the new flight path noise. Yesterday, my family and I got woken up at 5:30 AM with flight after flight going (what seems like) directly over our house. This is VERY disruptive. I originally thought this must be a temporary re-routing because I couldn't fathom that this would be an approved, permanent, change given how negatively it impacts residents in the area. Not to mention the potential negative impact on home values...</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
386	<p>The January 2020 change in flight paths has caused significant negative changes to daily living in my home and to my family. The constant noise from as early as 5am to 11pm frequently disturbs my 4 month-old's sleep, often waking her up from naps and from sleep early in the morning once flights resume. The noise from the planes also affects my home's outdoor space as my family has concerns surrounding increased air pollution. We are not able to enjoy watching television, reading, or even having a conversation either indoor or outdoors because of how loud the noise is. We cherish our time at home and would greatly appreciate if the FAA were to take the affected communities' concerns and perspectives to heart and revert flight paths to how they previously were. There must be a solution that benefits all. Please restore normalcy for my family.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
387	<p>The new flight procedure change recently implemented by the FAA is unfair to me and my neighbors. I live in Bellevue Forest in North Arlington and have noticed a spike in airplane noise since this change was implemented. Not only has it been louder, with lower planes flying above my house but it starts earlier and seems to be without breaks. Living where we do my neighbors and I have come to expect some level of airplane noise, but what this change has now done is unfair and needs to be reconsidered, not only for the noise pollution but the environmental impacts of these flights over our homes as they are no longer flying along the river. Please reconsider the implementation of this plan.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
388	<p>I am writing once again to complain about the disruptive airplane noise every day, almost all day. I live in Bethesda about a half mile from the Potomac River. Every day before 6 AM and after midnight there are planes flying into and out of Reagan Airport almost directly over my house. Sometimes the pilot seems to change direction and is flying directly over my house. It is impossible to block this noise. It disturbs sleep and concentration. No longer can I sit on my porch for meals or relaxation. Conversation is impossible. Plane after plane after plane. Sometimes there are planes in the early morning hours of the day..3 or 4 AM. A few years ago, when the flight path was more directly over the Potomac River, it was disruptive but more tolerable. Not so anymore.</p>	<p>Comment not directy relevant to the proposed project.</p>
389	<p>The recent change in flight paths has substantially increased the noise and the frequency of loud noise over our home. It is very noticeable and unfortunate.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>

390	<p>I have lived under the National/Reagan flight paths since 1952... I recall vividly the screeching Viscounts, the Constellations, the introduction of noisy Boeing 727's and everything since. My complaint is with regard to landings/approaches from the north during low ceiling/inclement weather. Normally, it appears that most arriving flights follow their prescribed Potomac River flight path. The period for the quietest in Foxhall Village was, unfortunately, post 9-1-1 when everything had to follow the river under the watchful eye of the Patriot Missile Batteries stationed at the Georgetown Reservoir and the David Taylor Research Facility. So without the benefit of aeronautical lingo, it appears that in clear weather pilots actually pilot the planes and follow the river route. It appears in inclement weather pilots rely on their instrument landing capabilities and these systems bring the craft directly over Foxhall Village (more specifically, directly over my house) often as low 1300-800 ft. if the information from Flight Aware is anywhere near accurate. During spring and fall months when most folks would have their windows open, we cannot open our windows because of the aircraft noise when they're on 'instrument approach.' We gave up years ago adjusting the TV volume up and down, raising our voices while entertaining guests, etc., and now have just given up, keep our windows closed year round and keep our HVAC running 24/7 which I'm certain many folks do to PEPCO's great pleasure. Concluding my complaint/observations about noisy landings: if this most recent controversy grew out of the advent of NextGen GPS-driven guidance systems and pilot discretion, it certainly follows that these advancements could also be employed to insure that flights approaching from the north could follow 'beacons', whatever, to follow the Potomac River regardless of weather conditions. As for take-offs to the north: I believe there is community concern/complaints about departing aircraft, too. I seems to me, and this is a relatively recent development that sitting in my 3rd floor room, with a southern exposure, that most departing flights have achieved a remarkably high altitude before reaching us in Foxhall at the 5-6 mile distance from the airport. Again, if Flight Aware is anywhere near accurate, it appears to me that most, not all!, flights may achieve altitudes of 4,800 – 6,800' before reaching our neighborhood. Again, by personal observation it really does startle me to see how high up and the ascent attitude is for many of these flights from the vantage point of my recliner. So, in summary... yes, over 67+ years of living with this I've grown somewhat immune to nuisance aircraft noise.... Again, the era of the Viscounts, Constellations and 727s compared to today.... things have certainly improved; but, it seems that in our particular case the majority of complaints are those experienced under inclement weather conditions resulting in low altitude approaches that certainly something can be done to address this.</p>	Comment noted
391	the new north-bound departing flight procedure (HOLTB) at DCA that went into effect on January 31, 2020 has significantly increased the noise around our home, especially during hours of usual quiet time. Please consider removing HOLTB. Thanks.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
392	since i only fly once a year it doesnt matter how the plane departs regean. it always comes in over the potomac	Comment not directy relevant to the proposed project.
393	This email is to complain about the recent increase in noise from flights taking off from DCA in the pre-dawn hours. For several years, 6am flights would wake us and the community. Now, we are hearing more flights, and earlier. It's hard to believe that moving the flights over northern VA by adjusting the angle of takeoff makes the White House safer.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
394	Steering flights away from DC comes as welcome relief from the sound disruption and other pollution that has been increasing over recent years.	Comment Noted
395	Please accept this email as my formal complaint regarding the air traffic noise crossing Southern Maryland in Prince Georges County, specifically route 210. The planes fly over my community (Simmons Acres) constantly throughout the day and night. The air traffic is noisy/loud and at night it can make it difficult to sleep. If possible can this traffic be rerouted over the water ways? I'm looking forward to more peaceful nights of rest.	Comment not directy relevant to the proposed project.
396	The change in the flight path has improved our quality of life. We already get beltway noise and are happy not to have planes flying over our house too !	Comment Noted
397	Although the public is led to believe the air traffic is routed over mid Potomac frequently it is in fact over Arlington and Alexandria. Flights are heard as early as 5:30 AM. Of course some noise has to be anticipated from a busy airport. However the strict requirements to stay over the river need to be implemented and monitored. Some compromise between quality of residential life and commercial air travel must be made.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
398	Please re-direct the flights into DCA that encroach on Alexandria. The flight path causes excessive noise both day and night.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.

399	The recent, sudden change in the northbound departure flight path out of DCA has greatly increased the noise in our neighborhood and in our home. There are days when we can hear the aircraft making their ascents every 90 seconds, starting at 5am until late in the evening, often until 10pm or later. This constant noise keeps us from enjoying our home. It interrupts our conversations. It wakes up our 4-month old daughter. It makes reading and watching TV impossible. I could go on but I think the point is clear. The noise makes enjoying all the typical, basic activities of life incredibly difficult. Additionally, as the weather gets warmer, I fully anticipate that the noise will keep us from enjoying being outside in our neighborhood. Activities as simple as going for a walk will become unattractive propositions. Finally, I am concerned that the move to bring aircraft over the densely populated areas of Northern Virginia will expose more people to greater levels of pollution. In short, my family and I are greatly displeased with the recent change in flight path and would like to see it revert back to the way it was prior to the change in January 2020. That, or implement some other change that minimizes noise and pollution levels over populated areas. Thank you for your time and consideration.	Comment noted, refer to Topical Responses for Noise, Air Quality, and Results of HOLTB.
400	I live in Old Town North Alexandria. Noise from airplanes landing and taking off existed when we purchased our property near the Potomac river. However, the new system has significantly changed the hours of operation at DCA. Flights begin at about 5:15 AM and we hear and observe flights landing well after midnight. These are not weather related flights but rather scheduled flights. What happened to the old mandated scheduling with an eleven o'clock curfew?	Comment not directly relevant to the proposed project.
401	It does not seem rational to me to route greater air traffic directly over the Pentagon and the increasingly populated Rosslyn neighborhood as opposed to the less dense rock creek parkway and tidal basin park area. Flights already err on the southern side of the river during their approaches and departures, and this change seemingly only encourages pilots to flight at lower altitudes over higher populated areas. It is also astounding to me that the graphics and reports made available for public comment do not provide more visual clarity or precision depicting the overlap of flight paths and neighborhood maps. The entire change is unnecessary, nonsensical, and poorly communicated.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
402	National security concerns should absolutely and definitively come first over a few noise complaints from folks who do not understand the importance of national security. That said, it would be great to have a cogent plan that those directly impacted in the flight path could thoroughly understand. Thanks for making our national security first. Please feel free to fully ignore the left-wing elite wackazoids who run and over inhabit the People's Republic of Arlington, Virginia.	Comment Noted
403	Planes are currently flying right over my house and so low that my windows are shaking.	Comment not directly relevant to the proposed project.
404	We are writing to register our strong concern with level of airplane noise at our home in the Donaldson Run neighborhood in Arlington County. The noise level increased substantially in 2015 after implementation of NextGen and became more pronounced with recent flight path changes in January 2020. The noise is more severe when planes are directed (as they typically are) to take off to the West of DCA and diminish when they land from the West, but the noise is otherwise constant through the day. We are commonly woken by planes taking off at 5:30 in the morning and hear them until 11 pm at night.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
405	My wife and I are against the current airplane routes from DCA. We live in North Arlington and when the planes take off to the North, we are often awoken from our sleep due to the noise. This is clearly causing a major noise problem to people who live to the north of DCA. Please change the routing of the planes to eliminate this negative impact on our lives. The noise has gotten worse in the past months and disturbed our ability to live comfortably. It's like living next to a railroad track when trains are going by.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
406	I live in the flight pattern of DCA...the real problem from my perspective is the noise generated by the helicopters. We have police, medical and military helicopters flying up and down the river regardless of wind direction. They must fly below 500 feet and they make the greatest amount of noise. I would hope that the helicopters are also considered in the noise abatement efforts.	Comment not directly relevant to the proposed project.
407	The January 2020 procedures have aircraft flying too low over our Villamay neighborhood and accelerating too strongly. Flights continue to begin before 6 am. This is compounded by again failing to consult with local neighborhood groups organized to work with you!	Comment noted, refer to Topical Responses for Noise, Public Involvement, and Results of HOLTB.
408	I have lived by GW Parkway for 30 years and have noticed the airplane noise has heightened because now the airplanes are flying right over my house. Family and guests have noticed it in and outside my house. We can not hold a conversation in my front yard or driveway because of the loud noise flying above us. What happened to the idea that the planes fly over the river at least some of the time? Are we protecting Georgetown from the flight noise?	Comment not directly relevant to the proposed project.

409	<p>The waypoint FAA is proposing to move permanently appears to fall directly within the North Highlands neighborhood of Arlington, VA (the maps provided are not clear enough to depict direct impacts). The new location, REVGE, is even closer to concentrations of residential buildings than the previous location which seems to fly closer to the commercial corridor in Rosslyn. The noise analysis FAA conducted shows many of the North Highlands residences within an average exposure of 60-65, right on the edge of the DNL exposure limit of 65dB. The analysis does not consider that times of heightened aircraft activity (summers, holidays, etc.) would most likely push those residences to exceed the 65 dB limit. How does FAA proposed to mitigate for these impacts? Additionally, over the past 10 years and more, the frequency of aircraft traffic over the north highlands neighborhood has significantly increased. The number of flights that occur during the overnight hours (11pm to 6am) has also increased. The analysis does not sufficiently address these cumulative impacts nor does it propose mitigation. We request that before any action is taken to permanently change the air traffic routing over this portion of Arlington, a more thorough analysis of the overall noise impacts to our communities be undertaken that assesses the cumulative impact over the years of increasing air traffic. This analysis should also include the impacts, per the latest studies (i.e. http://www.euro.who.int/en/health-topics/environment-and-health/noise/data-and-statistics), on the health impacts of noise.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
410	<p>I am writing to complain about the recent changes to aircraft flight routes along the Potomac River in the HOLTB. I have lived along the Potomac River in the Dover Crystal neighborhood in Arlington County for over twenty years, and the airplane noise continues to get progressively worse as there are more frequent flights. Contrary to airport rules, flights arrive as early as 5:20 am and depart as late as 11:30 pm (even later on occasion). The change of flight patterns has markedly increased the noise over my house, has disturbed the avian population, and has disturbed my sleep on an ongoing basis. I respectfully request that the flight patterns be returned to their pre-January 31, 2020 pattern.</p>	<p>Comment noted, refer to the general comments sections regarding noise analysis.</p>
411	<p>Our family has been very bothered by noise due to the constant flights over our house. The flight path to DCA has changed and instead of planes flying over the Potomac, they now fly right over my home and yard. It is very disruptive and it really impacts the quality of our life. Even sitting here in my office with all the window closed, I hear a constant stream of planes. When they flew over the Potomac river, we did not have this problem. I would like to register my complaint about this. I hope you will reconsider the plan to make this new flight path permanent. I would be happy to discuss this further.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
412	<p>You give no details of the alleged national security concerns underlying the proposed change nor do you give any evidence to suggest that these concerns have been alleviated by the changed route (or waypoint). So why make the change imposing yet more intrusive aircraft noise on those of us who live in North Arlington. There may also be concerns over aircraft overflying the taller buildings in Roslyn. Whilst driving west on the GW Parkway at around 5 pm on 1 March I noticed an approaching aircraft surprisingly - to me - close to the buildings.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
413	<p>The changed approach route to Reagan National in February substantially increased the intrusive noise we experience (we live in Crystal Springs Knolls). Was it really necessary after years of operating the old route over the river? What are the alleged national security problems that caused the Secret Service to demand a change without proper public consultation? Today, 3 March, I notice that some but not all planes approaching the airport have reverted to the old route, thus enabling a fair comparison to be made. In short planes on the old route are audible but not troublesome, whilst those still using the new routing are definitely intrusive even with all windows and doors shut. I hope you can revert to requiring all planes to use the old routing.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
414	<p>We live in the Bellevue Forest neighborhood in Arlington and we wish to complain about the unbearable noise level coming from the DCA airport activity. Airplanes fly as low as 1,200 feet directly above our roof. We have also noticed in a period of 2 years, that flights start earlier in the morning (5:45 am) and continue until well after midnight. This restricts severely the amount of rest we can obtain at night. All day long, an average of 30 airplanes an hour fly directly over our house. This is unberable. We also noticed that the percentage of airplanes landing, as opposed to airplanes taking off, hs been increasing over time. Landing airplanes generate more noise as they are flying lower and slower. We have also noticed that all flights follow a pattern of flying directly over Bellevue Forest, while 2 years ago a number of flights were directed toward the other side of the river or at least over the river. Finally this air traffic generate a lot of pollution on the ground. We increasingly notice an oily deposit on our deck and on our cars. This is potentially hazardous to our health and should be investigated. In summary, the FAA shows a complete disregard for the well being of the residents in our area. Reflecting on the recent events related to the licensing of the 737 Max, where FAA has shown an amazing and tragic lack of interest in the safety and security of the air passengers. It shows a pattern of incompetence. We feel that the FAA should find solutions involving a sharing of the flying disturbances between a large number of neighborhoods. I should also ban flights after 9:00 PM and before 6:00 AM. Finally, in general, DCA should return to its function as a regional airport.</p>	<p>Comment not directy relevant to the proposed project.</p>

415	I am directly under the path to National Airport at the end of N Fillmore Street in Arlington. Airplanes fly over my house until after 12AM and start again by 6 AM. During the 19 years I have lived in this house, the airplanes have crept over to the Virginia side of the airport path. These disturbances are unhealthy because they disturb the sleep that we all need for our bodies to function properly. Change the path!	Comment not directly relevant to the proposed project.
416	We have been bothered by aircraft noise for quite some time and I believe that this new change will make matters worse as aircraft fly low directly over our houses. The new traffic pattern as evidenced by the graphics you have shown of actual flight trajectories shows many more flights flying directly over our houses causing us to have to stop phone conversations while indoors with windows and door shut. The problem is exacerbated if I open a window or try to have a conversation outside with a neighbor. Furthermore, the information in the report outlining the purpose to improve national security is illogical. The stated intention is to avoid the incursions into restricted areas by nonthreatening aircraft that happen on average less than once per week over the last eight years. First, threatening aircraft are unlikely to follow FAA policy and would ignore the new flight plan. Secondly, even if nefarious actors did follow FAA policy, the change for an aircraft that is flying at 150MPH (takeoff speed for a 737) would result in less than four seconds of additional flight time. Therefore, this change will appear to have no to minimal impact on national security while having a great deal of impact on the quality of life of the nation's citizens.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
417	We have been bothered by aircraft noise for quite some time and I believe that this new change will make matters worse as aircraft fly low directly over our houses. The new traffic pattern as evidenced by the graphics you have shown of actual flight trajectories shows many more flights flying directly over our houses causing us to have to stop phone conversations while indoors with windows and door shut. The problem is exacerbated if I open a window or try to have a conversation outside with a neighbor. Furthermore, the information in the report outlining the purpose to improve national security is illogical. The stated intention is to avoid the incursions into restricted areas by nonthreatening aircraft that happen on average less than once per week over the last eight years. First, threatening aircraft are unlikely to follow FAA policy and would ignore the new flight plan. Secondly, even if they did, the change for an aircraft that is flying at 100MPH would result in less than five seconds of flight time. Therefore, this change will appear to have no to minimal impact on national security while having a great deal of impact on the quality of life of the nation's citizens.	
418	The new north-bound departing flight procedure (HOLTB) at DCA that went into effect on January 31, 2020 has increased noise over my home substantially. It is most noticeable early the morning when the flights start taking off around 5:45AM. When I moved here 25 years ago, I knew I was in the flight path of the airport but was fine with that as I love watching the planes. Over the years, the number of flights have increased as have the number of Stage 3 compliant aircraft taking off and landing before 7AM and after 10PM. Where we once had quiet in the mornings until 7AM, we are now assaulted with noise every two minutes or so from 5:45AM to 7AM when planes are taking off to the north. In addition, the flights used to track out over the river. Now, they cut the corner and fly directly over Rosslyn and my home. I assume this is to avoid creating noise for the very vocal group in Georgetown and Foxhall areas. As a pure safety concern, it seems foolish to fly directly at the tall buildings in Rosslyn rather than stay out over the river. From a noise perspective, flying over the Rosslyn area affects many more people than flying over the river, or even over the DC side of the river because the Virginia side is much more densely populated with all the mid and high rise buildings. The departure track needs to be adjusted to keep planes out over the river, or at least varied so that sometimes, the planes go over Virginia and sometimes, the planes go over DC. Varying the departure track seems to be the most fair way to allocate the less pleasant aspects of living near an airport.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
419	I would be interested to know what the stats were before we went to RNAV departures. On visual days, I never saw anyone forget to turn up the river and seemed like we used to turn up the river much sooner than the RNAV departure. Moving it west is good, but I'd like to see us return to visually flying up the river on days when the weather permits.	Comment noted, refer to Topical Responses for Need for the Proposed Actions.
420	I am a resident of North Arlington and the recent changes in flight paths away from the Potomac river and over my home are causing a constant nightmare - awakening me early and keeping me from sleep in the evening hours - 11pm, midnight and even 1pm landings. Both in the take off position and especially in the landing at DCA, these airplanes have no reason to be coming this far over land - they should remain to the historic path of generally following over the river during landing and take off. This slight difference, cannot mean anything measurable in safety concerns of protected DC airspace, and have a magnified effect on home owners and quality of life in the area. I just stood in my kitchen today at 12:30 pm, and noticed a southwest flight come in so loudly that I had to stop a conversation due to the noise level. These Southwest planes are the worst and I beg of you to return the flights back over the river.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
421	I live south of Old Town Alexandria near the GW Parkway and have been constantly disrupted by noise pollution from the flight paths for DCA. It was not this way when I purchased our home and now when I am in my backyard I cannot hear someone talking right next to me when planes are flying overhead. Please change the procedure so planes follow the river much farther south so the noise pollution is less intrusive. Thank you for your consideration of the people affected by this.	Comment noted

422	Hello – I am writing to complain about the change to route the aircraft when taking off South from DCA and they all turn East near Morningside and Sherwood Hall Lane. I do not understand why these aircraft cannot fly further south over the river for more altitude before turning. This will increase their flight path by a few miles and minutes. The noise is deafening and makes being outside very uncomfortable. The noise inside is also loud and not healthy. The planes fly over every 3-4 minute, below is the most recent flight.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
423	At 10:54 on 3/3/20, a low-flying gray helicopter flew directly over my house. Even while being inside on a cold day - the helicopter flight was disruptive. If this continues I will lose the enjoyment of being outside in my own yard - and in the park which is immediately adjacent to my property. Arlington residents are being abused by the FAA's decision to move flight patterns without public input from our communities. Do whatever possible to find other flight patterns that do not cause hardship to the residents of Aurora Highlands.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
424	I am a homeowner in Palisades Park, Arlington and am writing to express my concern over the increased noise level here from airplanes using Reagan National. It has long been a concern of mine that we are overburdened by noise pollution here because of the flight patterns that avoid NW Washington. However, on days of dense clouds the flight pattern changes and the planes overfly that section of the city. Clearly the preferences of influential residents there have been able to limit their exposure to noise pollution to those days when it is absolutely necessary. There is no justifiable reason for this. I realize that after 9/11 that safety theories were postulated to the advantage of those businesses and residents. The result of those decisions is that we, on this side of the river bear a burden of being assailed by noise pollution. As I have observed over the years, many carriers follow the course of the river as only a suggestion and overfly the land on this side, American Airlines being the biggest offender. And now we are expected to tolerate even more noise from recent decisions by the FAA. I want to state that along with an intolerable increase of noise pollution this decision has also effected the air quality here, as I often smell jet fuel now in the air. The increased flights out of Reagan National have contributed significantly to the aforementioned consequences with little or no regard to the citizens and voters who live here. The cost for the convenience of so many flights using Reagan National should be born much more equitably by all of the citizens and business in the area, including specifically NW Washington. There was a time in the not too distant past when this was the order of the day.	Comment noted, refer to Topical Responses for Noise, Air Quality, Need for the Proposed Actions, and Results of HOLTB.
425	I live at River Place East in Rosslyn, 1021 Arlington Blvd, and my bedroom window and balcony face northeast towards the river. My living room faces southeast. The existing flight plans were bad enough, but the noise from the new flight plan is mind numbing. I lie in my bed and literally see planes flying low, right past my bedroom window and listen to the engines roar. Depending on the wind direction, they both land and take off and both situations are noisy. They start at 5:45 AM, seemingly earlier than they did 2 years ago when I bought my property, and go right up until midnight. It seems they used to stop around 11 pm but now run later? I no longer have even 6 hours of "quiet time" for sleeping! Because of this noise, the resale value of my property has also declined. I also occasionally hear a wee hours jet landing or taking off between 12am and 5am! How is this allowed? I have double pane insulated windows and the noise is still intolerable. I also have a fine black dust on everything on my balcony and also in my apartment, even when keeping my windows closed! This can NOT be healthy. When using our community pool located between the 4 River Place buildings, planes fly over constantly, making it difficult to even read a book or have a conversation. Someone from the FAA needs to come to the property to actually evaluate and experience how adversely we are affected by the planes constantly roaring overhead. On the rare occasions when they fly directly over the river and Roosevelt Island, it's not as bad. I met a pilot once at an event and joked that he was probably flying over my building and keeping me awake instead of staying over the Potomac. He laughed and said that they sometimes "cheat" and cut it close. I didn't find it amusing, and now it seems that the new FAA flight plans actually will force planes to fly directly over my building and further south of Roosevelt Island than in the past. Is there no way to have them stay over the Potomac a little longer before they "detour" away from the prohibited zone? That's my two cents...	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
426	Not writing to complain. I just moved to Arlington. I hear the jets. I don't care. I pay a steep fee here to work my job and not deal with as much traffic as I would living in Fairfax or south. Even though things here (property value, taxes, Maryland drivers) are a nuisance, jets and their sound is nowhere near the top. Please inform the complainants that while it is their right to complain, they are wrong and they should feel bad.	Comment noted
427	Most days I am woken up by airplanes flying over my house in NW DC. Ever since the new pattern of flights started that cut across DC I have been woken up by the planes. Usually they fly over my house starting around 6:30 am. This new pattern has created issues for all of my neighbors. In addition, the planes are a safety hazard that has never been studied from crashes, dropping fuel in emergencies and other issues. Flights should go back to flying over the Potomac River for noise and safety reasons. I understand that DCA wants to expand its flights but the noise impacts large groups of people that live in the new flight path that the FAA created for DCA.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.

428	I have noticed that the aircraft noise over my home has become much louder in recent weeks. Not only is it unpleasant, It is disrupting my family's activities and sleep, both in and out of the house, as well as that of our neighbors. In addition, it is disrupting the wildlife in the area. This evening a loud, low aircraft frightened a herd of deer out of Windy Run Park, through my yard, and into the street as cars were driving by. I hope you can please make an effort to redirect the airplanes over the river rather than over our homes.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
429	Hello, I live in the unit block of North Garfield Street in Arlington and have noticed a significant increase in airplane noise and helicopter noise. We have had a major increase in low flying helicopters at all hours of the night. They are not only very loud, but also very disturbing. The plane that hit the pentagon on 9/11 literally flew low and right over my house; we were outside in the yard and saw it. It is very disturbing to have these low flying aircraft at any time of day. I have lived here for 34 years and we never had this much airplane noise. Would appreciate a change. Thank you for your consideration.	Comment not directly relevant to the proposed project.
430	I am in the flight path of departing planes from Reagan Airport. (I fly over my house in Kensington often when I fly out of that airport.) It doesn't bother me any more than being around any other airport. If you live in Philadelphia you have noise from that airport. If you live in New Jersey you have the noise of jets going to numerous airports. It is part of living in an urban area. Of all the noise issues that I have airplane noise ranks somewhere down the list after my neighbors constantly using his buzz saw, my other neighbor hammering and my back neighbor using his leaf blower. Around the corners is a busy firehouse. All much more noticeable than jet noise. Jets are beautiful marvels. How many kids look up at them and wonder where they are going. Wondering about the kid in the jet looking down on them. Leave the pilots to do their work without having to constantly worry about persnickety urbanites.	Comment noted
431	We are disturbed by airplane noise, inside our home, all windows shut. March 3, 2020 @7:15am.	Comment not directly relevant to the proposed project.
432	As an Arlington resident near the GW Parkway/Potomac River, I would like to express my disappointment with the new flight patterns and increased noise. It was already bad enough in my neighborhood when I moved in 7 years ago, although I accepted that as the price of living there. However, I never intended to live somewhere where the planes fly directly overhead. The noise level has increased dramatically as a result and makes being outside or having the windows open a nuisance. I would like to see the flight pattern shifted back over the river so that residents on both sides are not impacted by the noise.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
433	I've been given to understand that recent changes to the departure procedures from Reagan National Airport mean more aircraft will fly directly over our community along the Potomac River rather than out over the river. My wife and I live in a community in Rosslyn, Virginia, along the river, namely Palisades Park, so we're directly and negatively affected by the recent changes and resultant increase in noise pollution. Accordingly, it would be appreciated if prompt changes can be effected to restore legacy rules for flights to fly over the Potomac River vs. over N. Virginia communities along the river. Please advise if additional information or assistance is needed to propose and/or approve such changes.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
434	Please do not further increase air traffic noise in my neighborhood.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
435	Our community is regularly disturbed by Ronald Regan Airport traffic, with additional military and other agency low level helicopter flyovers. A more considered plan, one that recognizes the air traffic impact on our community, is needed.	Comment not directly relevant to the proposed project.
436	I live south of Reagan in the north part of Old Town Alexandria. I have been living here for a couple of years and although you can often hear them to some extent, the planes are much louder than before, especially when taking off to the south. More often they are also not staying over the river or on the eastern side of the river toward National Harbor which is less populated. Rather they are flying inland right over Old Town. Tonight (after 11 pm) they also seem to be louder than normal and not adhering to noise restrictions for late night flights. This is a nuisance and disturbance for the entire area. With Reagan seemingly only getting busier, something needs to be done.	Comment not directly relevant to the proposed project.
437	This is a total red herring. The noise at Washington National Airport has subsided over the years due to modern engine technologies. The amount of noise is a infinitesimal amount compared to the convenience of a close in airport and it's attributed as a gateway to US travel. The fact is that Dca should have more not less travel (frequencies) to allow for greater competition and greater travel options.	Comment noted
438	Planes fly directly over Chain Bridge Forest Arlington neighborhood and low over house. Constant Noise and proximity to houses unhealthy for all but especially children living there. Please route planes over river not over houses.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.

439	While it is not every night, I usually have to plan for all windows shut, earplugs in and any white noise machines to play so that the airline noise is minimal, but usually am woken up around 6am. I am within 2 miles south of DCA and when the planes take off to the south, its guaranteed that I'm up with they start their day. If they follow the river, It's definitely less of an impact, but when they divert directly after take off, I hear it. This has gone on definitely earlier than their stated plans of January. This began late November/early December. If there are no changes, there will definitely be worsening affects when the weather warms and more windows are opened. Please stay along the Potomac before diverting the patterns. This worked for many years, it should continue to do so now.	Comment noted, refer to the general comments sections regarding noise analysis.
440	We are in Bellevue Forest in the path of incoming/outgoing flights and I see that the marker (BEBLE) is on top our home location. The noise, frequency and low altitude flights has become a huge nuisance from 5am until after midnight. If you put a camera and a decibel meter you may understand how invasive this problem has become. Over the river approach and higher altitude would help mitigate a lot of the noise.	Comment not directy relevant to the proposed project.
441	As a resident in Arlington's East Falls Church area, I would like to voice my concern for the number of low flying helicopters in the area. This does not happen often but when it does it literally shakes the house with loud noise. It appears that the military helicopters are coming from the Pentagon to Langley but this is speculation. Is there anything that can be done to ensure that flights fly prescribed routes and altitudes that lessen the impact.	Comment not directy relevant to the proposed project.
442	Airplane noise above the Rosslyn area is already consistent and detrimental. Taking any further action to contribute to airplane noise will negatively impact the community in various ways.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
443	I live in the Belleview Forest subdivision of Arlington adjacent to the GW Parkway and a third of a mile from the Potomac. Chain Bridge is a mile or so to my northwest. Aircraft departing to the north from DCA follow the Potomac more or less. But the waypoint locations cause them to cross over my home routinely - with maddening regularity. The radar track data from Web Trak indicate that at least 90% of the departures cross from DC to Virginia over the Potomac river, flying over the Parkway and into my neighborhood. I presume this occurs because pilots execute too much of a leftward bank as they cross over Rosslyn. That is (after Rosslyn), rather than flying across the Georgetown Reservoir and above Canal Road following the river, they swing into Virginia. Its not clear to me why that course is followed since it causes aircraft to fly well outside the rather wide Potomac River corridor and into my neighborhood. I presume the aircraft are following waypoints. If so, those locations should be situated so that aircraft bank less above Rosslyn and instead adopt a course leading directly to Chain Bridge. As indicated, even a cursory review of the radar tracks (and the view from my office window) provide compelling documentation that the current waypoint locations cause virtually all departing aircraft to the northwest from DCA to fly over my neighborhood rather than over the river. Indeed, their current course causes to maneuver excessively rather than flying a straight course toward Chain Bridge. I have a second suggestion which is that morning departures occur from DCA to the south, above much less densely populated neighborhoods and the much wider Potomac River. Thanks for reading my complaint and I hope you can act to keep departing aircraft over the river between Rosslyn and Chain Bridge. I note that aircraft arriving at DCA from the northwest are far more likely to follow the riverbed and not intrude into my neighborhood.	Comment not directy relevant to the proposed project.
444	I no longer need to set my alarm in the morning. Every day, at approximately 5:45 am, I am awakened by the first flights leaving Reagan airport. I live in central Arlington, near the intersection of Rt. 50 and Glebe Road, and in earlier times (I have been at this address for 35 years) airplane noise was not an issue. Now it is. I assume I am not the only central Arlingtonian to notice, and regret, this change.	Comment noted, refer to the general comments sections regarding noise analysis.
445	I read an article on WTOP today saying to write to this email address after one hears noise from airplanes. I am not sure if this is just directed at Virginia people, but I live in Bethesda, MD and just two minutes again, I experienced a low flying plane which was so loud that it shook my house. This is not uncommon for my area.	Comment not directy relevant to the proposed project.
446	We ask that you please enforce rules making aircrafts fly up the river during the hours of 10 pm and 7 am. and disallow them to fly over our neighborhoods. Palisades Park in Arlington for one is getting way too much traffic and noise during these hours, and it wakes people.	Comment not directy relevant to the proposed project.
447	I am writing to complain about the recent changes to the aircraft flight routes along the Potomac River in the HOLTB. I have lived along the Potomac River in the Dover Crystal neighborhood in Arlington County for over twenty years, and the airplane noise has gotten progressively worse and worse. Flights arrive as early as 5:20 am and as late as 11:30 pm (even later on occasion). The change of flight patterns has markedly increased the noise over my house and has disturbed my sleep on a regular basis. Please change the flight patterns back to the pre January 31, 2020, pattern.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.

448	Returning to Springfield, VA, in 2016 after an absence of three years, I was disturbed to discover that aircraft noise in the neighborhood had soared. Aircraft are flying overhead, one after the next, in intervals of 5 or so minutes in certain periods. From Lake Accotink and nearby points, I can clearly see planes tracing a line in the sky. Aircraft are flying low, which is why they are so audible. I work near Dulles Aircraft. Frankly, the noise is no worse there than here in Springfield, far from any airport. The reason is probably that the aircraft rapidly take off from Dulles, climbing quickly and leaving the area. The aircraft heading to and from Reagan are flying low parallel to the ground over Springfield, hence the noise stays with us almost until the next aircraft appears overhead. They fly at almost all hours. I hear aircraft before dawn. I hear them well into the night. Engine noise often changes. Are some aircraft "downshifting" overhead as they approach Reagan? It is a nuisance. I bought a house in this neighborhood in the 1990s for peace and quiet. It is unfair for the FAA to change the environment in Northern Virginia with zero input from citizens.	Comment not directly relevant to the proposed project.
449	I am in the neighborhood called Glen Echo Heights, very close to the Potomac River. We have lived here for 42 years. The current level of airplane noise from National airport is higher than we have ever experienced. Years ago, we hoped that newer quieter planes would be the answer. Now we are often awakened after midnight by planes. The morning planes start around 6 am, often before. The time used to be 7 am. We are both retired. We notice when we travel our sleep is much better because it is quieter. We often cannot sit outside in warmer weather because the plane noise makes conversation too difficult. The planes don't stay over the river. They shortcut right across our neighborhood. At the very least, they should go back to requiring aircraft to stick to the river and resume reasonable time restrictions for planes landing & taking off at REagan National.	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
450	I looked at PDF showing airplane shift to over Pentagon. I moved to Arlington Forest 40+ years ago. Because I had lived on JFK's glide path, I looked UP before looking at the prospective house. Real estate agent: "what r u looking for?" "Airplanes!" "No airplanes over this neighborhood." "Let's lookit the house." Bought it. Still here. Some time back, when Congressman Wolf was in office, people living in Potomac, Maryland, complained about airplane noise. 10 complaints / day. Wolf had the airplanes go over middle of Arlington. 5000+ complaints / day. To the Potomac toads: See? 5000 is orders of magnitude more than 10. Some woman posted on the WTOP site "We had no idea airplanes came up here!" I replied "You should have LOOKED, like I did. Now, live with it, or MOVE." Some greedy developer bought land next to Nellis AFB in Nevada, and sold houses. Soon, morons who bought houses next to a fighter plane base went to court to complain. Judge told them that the base was there since WWII, they just moved in, and they should have recognized that there would be airplane noise. Dismissed with prejudice, and don't let the door hit you in the back on the way out.....So, the bottom line is: I don't care where you send the airplanes, just so long as it continues to be QUIET over MY house in Arlington Forest. I chose carefully, and don't want to give up the serenity I chose by purchasing my house here.	Comment noted, refer to Topical Responses for Noise.
451	I bought my house in 2011. Back then there were complaints about airplanes at all ungodly hours. Today I find the noise at times unbearable. There is a flight every few minutes often late into the night. Some planes are flying so low and are so noisy that my windows are shaking.	Comment not directly relevant to the proposed project.
452	I am writing as a 22-year long Arlington resident, the last 8 of which I've lived in the Dover-Crystal neighborhood adjacent to the Potomac River. When moving into this neighborhood, I already was aware of the airplane noise, and it surely caused me pause as I weighed moving here, but ultimately I determined that the noise pollution was manageable. I have noticed a sharp uptick in sound and noise over the last several months - indeed a plane is flying overhead as I type this email. I recognize that air travel is essential and I benefit from the proximity of DCA. But there must be a solution that does not involve a disproportionate impact on Arlingtonians.	Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.
453	I am concerned with the increased airplane traffic and accompanying noise occurring over my neighborhood, Palisades Park, located in Rosslyn (zip code 22209). It is particularly disruptive through the evening and early morning. I feel as though the level of noise and frequency of these disruptions are both increasing to the detriment of the lifestyle in and desirability of the community and as such wish to submit this formal complaint with the hope that you will address this matter. Thank you for your consideration.	Comment not directly relevant to the proposed project.
454	PLEASE discontinue the current flight pattern. My sleep is interrupted at all hours by planes thundering at low altitude directly over our home, sometimes at intervals of no more than 5 minutes apart. Quality of life is suffering.	Comment noted, refer to Topical Responses for Noise, Scope of the Proposed Actions, and Results of HOLTB.
455	Despite filing numerous noise complaints about flights from Reagan National disrupting our sleep, the pattern continues. Everything from a recent low flying plane over our house at 4:30 in the morning to variations on the theme: before 6am, very low, very loud. I would appreciate some relief. Thank you.	Comment not directly relevant to the proposed project.

456	<p>I am writing to ask that FAA issue an ORDER directing airplanes landing and taking off to the North to fly directly over the Potomac River until they reach the Capital Beltway and begin to diverge towards their destinations. I have followed this issue for 22 years, as I was formerly a Neighborhood Association President and a member of the Western Montgomery County Citizens Advisory Board. After September 11, 2001, planes were put on direct flight paths that left the Potomac River's path, and communities came together to work with the MWAA to ask that flights return to flying over the river. Eventually, planes returned to flying more directly over the river, as they had done for many years prior to 9/11. More recently, it is my understand that the FAA has used the NEXT GEN flight system, and that this has led to a return of the same problem--planes have left the river's path to fly directly over homes, including my home, at 5225 Westpath Way, Bethesda, MD 20816. This is causing very loud noise, that could easily be avoided by directing the planes to adhere strictly to the Potomac River's path. The noise is especially bad late at night (7-11 p.m.), and early in the morning (6-9 a.m.). It is loud enough that, when the planes are flying low, under the clouds, I cannot hear another person speaking to me outside. It would be relatively easy for airplanes to follow the river, both because the river is easy to see, and, when the clouds are too thick, by using GPS. After all, the requested relief is really just a return to the overflight of the river that was practiced for years. As someone who hears the planes everyday, and someone who respects the hard work that United States government employees do, I implore you to issue a formal ORDER directing all planes to follow the Potomac River's path to the Northwest, as they arrive to, or depart from, Washington National Airport.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
457	<p>This survey should be offered when people's windows are open during mild weather, NOT now when they are shut as they are now!! In general our Arlington neighborhood (Ashton Hgts.) has been bothered by aircraft noise and anything to lessen that is needed. Thanks</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
458	<p>My husband and I are owners of a condominium in Sumner Village, The current flight paths bring planes over our condominium complex with disturbing frequency at all hours of the day. There is mostly a lull between midnight and 6:00 a.m., but we often still hear some airplanes in this supposedly quiet period. We bought our home here because we wanted to live in a setting that had lots of trees, access to nature trails and a quiet atmosphere. The constant air traffic is noise pollution that interferes with our enjoyment of the setting in which we live.</p>	<p>Comment not directy relevant to the proposed project.</p>
459	<p>the Bitching people have never heard a noisy airplane. I grew up in Arlington County and we loved the super constellations going over. the ground shook, as they pulled for altitude and the china rattled in the house. Nothing flying today is noisy, and aircraft have been following the river forever and bothering nobody, these nuts move in near an airport, and wonder why airplanes fly over. Airplanes have been flying cross the county for years. You can not hear most modern aircraft inside homes in Arlington. Do not bow to these misfits. Hint. Washington National Airport shortened to National Airport, tack on honor of Ronald Reagan, and shorten it to National Airport.</p>	<p>Comment noted</p>
460	<p>The noise over Sumner Village is constant and deafening. Something must be done.</p>	<p>Comment noted</p>
461	<p>Anytime it is IFR and aircraft are taking off from RWY 19 - They turn them right soon after takeoff, right over the Del Ray neighborhood of Alexandria. Normally they fly over the Potomac towards Mt. Vernon. The planes are low, slow and loud. The house rattles and shakes. If it were VFR I could give you all the tail numbers. How is it safe during IFR but not during VFR? Is it safe to fly over a crowded residential neighborhood in poor weather? I am an Airline Transport Pilot (ATP) with three type ratings. Flight safety is very important to me.</p>	<p>Comment not directy relevant to the proposed project.</p>
462	<p>Aircraft noise at 5:30 wakes us up. We have noticed that many flights are now being routed over our house. It is extremely bothersome, so we urge that past policy of having the flight route follow the river remain in place.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>

463	<p>I am writing on behalf of the Ashton Heights Civic Association (AHCA) which is composed of 1600 households essentially between the Clarendon metro stop and Ballston metro stop in North Arlington of which many times is directly under the flyways of both helicopters and smaller aircraft going in-and-out of Reagan National Airport. AHCA has been advised by Arlington County government that we are to input into the HOLT B study by March 30, 2020. After receiving over 100 complaints beginning in late 2017 through 2018, we began our own internal study of this problem which essentially relates to very low-flying aircraft (both helios and small planes) over our suburban neighborhoods that were actually shaking houses and in some cases knocking items off shelves. My own residence and also an office building on my property (706 North Ivy Street, Arlington, VA 22201), this happens quite often right through February 2020. When we submitted our findings in late 2018, FAA would not respond to our submissions from our civic association. Our Committee Chair established for this issue was advised by the FAA that they do not track aircraft or helicopters, and that helicopters have no formal requirements on how low they can fly over residential neighborhoods. We subsequently reached out to our County and federal representatives to address the issue. To be clear, we have no objections of low-flying helicopters for police, health emergency, or terrorism protection - but these uses are a very small part of the problem. To also be clear, the neighborhood within the Ashton Heights Civic Association (AHCA) has a much higher national & state averages of two demographics: 1) elderly above 65, and 2) home-based businesses and telecommuting. These disruptive low flights that actually cause vibrations in our buildings disrupt business, health & well being, and in the evenings - disrupt sleep. Additionally, the recent proposed changes in regular flight patterns to-and-from Reagan National Airport that divert more flights from along the Potomac River onto a much wider swath of residential neighborhoods within Arlington County, over Rosslyn, Courthouse, and Ashton Heights - which is the highest concentration of residential and commercial buildings within the County has negative repercussions .. noise, pollution, and safety. AHCA, in our previous communications to FAA and to our elected representatives strongly suggest: 1. Adhering as many flights, low and high over the Potomac River as possible. 2. Requiring the next tier of flights to follow major transportation high-volume thoroughfares such as GWU Parkway, Routes 95/395, and Route 66, where there are less concentrations of housing 3. Issue formalized and public guidelines for all non-emergency aircraft (passenger jets, smaller aircraft, and helicopters) on how low they can fly, recommended routes that have less housing underneath, large lettering underneath the aircraft so citizens can report deviations from guidance, and a formal web reporting system so FAA can keep track of complaints to guide pilots and aircraft owners and companies. AHCA is willing to work with you and our County to resolve this issue. But we should not have to be impacted by increasing noise, increasing pollution, increasing vibrations of our buildings, disrupted sleep, and business interruptions. And we hope that the FAA will work with us, as partners, to resolve these issues rather than act in an arms-length manner as in the past. Thank you for your serious consideration.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLT B.</p>
464	<p>The airport has been there for decades. Housing was built up around the airport. People chose to buy these homes knowing that airplanes make noise. Whining about it now is unacceptable. Do not cave in to those who made their choice</p>	<p>Comment noted</p>
465	<p>Airliner noise is not too bad at our home except on rainy/foggy days. We experience a LOT of loud helicopter noises including what looks like several large military choppers in a group. Occasional frightening LOUD high speed military jet (?) flyovers. Perhaps military are exempt from normal noise control plans? While we support safety and security, this seems unnecessary and improper since we're not at war. We recognize how close we live to National airport, the capitol, the Pentagon and accept certain things as part of those privileges. We notice no significant noise problems associated with commercial air traffic, just occasional (at least weekly) military appearing planes and helicopters.</p>	<p>Comment not directly relevant to the proposed project.</p>
466	<p>I am writing to register a complaint about the recent change in flight path from DCA. I live in Riverwood and the new path causes many more planes to fly over my house. The noise from the planes is very disruptive, and the vibration that is caused is a concern. It is often necessary to pause a conversation while the plane goes over, even inside the house, but especially if you are outside. I work at home and it can be difficult to have a phone conversation -- as I sit at my desk, I hear the planes one after the other. I also fear this situation will affect home values. I hope that you will reverse this decision and move the flight path back over the river, away from Arlington neighborhoods and take other noise abatement measures as possible.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLT B.</p>
467	<p>My wife and I are residents of the Woodmont Neighborhood in Arlington County, VA, and are affected by the disturbingly loud noise associated with flights coming out of National Airport DCA. When outside in our back yard, it often is difficult to conduct uninterrupted phone calls or conversations due to flight noise. We urge you to reconsider the permitted flight paths to better avoid our Northern Virginia residential neighborhoods and parks.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLT B.</p>

468	: I saw an article today on the WTOP news website that the FAA is requesting citizen feedback about Reagan airport noise. Usually the flight pattern for Reagan does not pass over my neighborhood, but today it is. It is loud, but not so loud as to disrupt my day. If the flights were stopped every evening by 8 pm and start no earlier than 7 am, (9 am and 9 pm on weekends) then the noise problem would probably not be as big an issue, in my opinion. My bigger concern is safety and security due to the proximity to DC. It is too close. Dulles is huge and the train will make it even more convenient, more accessible. Do we need both airports? Is Reagan airport needed? Is Reagan airport worth the security risks? Official government flights can go through Bolling airport. Also, I have seen an extraordinary number of near misses while flights cross-cross the skies above Rockville Maryland heading to and from all the many nearby airports, nearly colliding right over Rockville. I see this every night while sitting out on my balcony. So close recently that the lights of one jumbo jet shone on the back of the other jumbo jet, and a nearby small aircraft heading out of Montgomery airport. The FAA should be more concerned about the safety of the congested skies. And, I am strongly against Uber helicopters and the use of nearby hospital helicopter pads for commercial and personal use.	Comment not directly relevant to the proposed project.
469	I rent an apartment in pentagon city. Aircraft taking off from Reagan national airport can be so loud that the glass doors and windows in my apartment shake. Some aircraft are quieter I imagine those are the ones with the newer engines but some aircraft, even small ones, can be so loud has to be easily heard regardless of what is happening inside the apartment. I hear aircraft departing Reagan national airport earlier and earlier every year. It seems that the airport is now almost a 24 hour facility. If the engines are quieter that would certainly be acceptable. I'm honestly surprised after 911 that the FAA allowed Reagan national airport to re-open. Maybe it's time to consider closing it.	Comment not directly relevant to the proposed project.
470	Since the planes were re-routed over my house we (my wife and 3 kids) are awakened daily before 5am by the thundering of planes over our newly built home. Literally, the windows rattle from the constant super loud noises from planes coming in out of of DCA. In the afternoons when we try to lay out side with the kids, there is never a break between the incredibly loud noises of jet engines. Literally - no gap between planes. I can still hear the last one when the next one is coming in. Forget a nice quiet bbq in the backyard. I have filed countless complaints on the FAA website and have asked to be contacted at the end of every form and never have heard anything back. THIS NEEDS TO CHANGE!!!!	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.
471	Please do something about the noise from RNA. I live on army navy drive. The incessant noise is disturbing and irritating.	Comment not directly relevant to the proposed project.
472	My house is now directly under the flight path in and out of National Airport. At night the planes' headlights shine straight into my bedroom. We are awakened at 5:30 AM and kept up until midnight. When does the FAA expect the residents of Arlington to sleep? When the flight pattern was on the centerline of the river we were able to get away with just ear plugs. But now even Boze white noise ear buds do not dampen the roar. We would be happy to host anyone from the FAA to verify the ridiculous disturbance caused by moving the flight path off the centerline of the Potomac. If the current flight pattern persists it will decrease the value of our property. Who will compensate the residents of North Arlington for this taking?	Comment noted, refer to Topical Responses for Noise and Results of HOLTB.

473	<p>You ask for comment on your proposal to change the take-off and landing routes over Arlington County, Virginia. You say that citizens have until the end of the month to submit same. My comments follow. 1. You should know, at the outset, that I and others have been trying to complain about aircraft noise over Arlington for several years. The noise-complaint link offered by DCA authorities to register such complaints does not work, and it has not worked for several months. It simply leads to a “this page cannot be found” notification. You are certain to have received an artificially low accounting of the actual noise complaints emanating from the citizens and residents of Arlington. Many who wanted to register noise complaints have been unable to do so. Inevitably, the resultant data are inaccurate and unrepresentative. 2. Yesterday (March 1, 2020) was a Sunday. At 5:53 AM I was woken by jet aircraft over my home, which continued in intervals of a few minutes. That is a typical morning in my neighborhood—weekday and weekend. 3. I was so awoken at 5:53 AM despite the substantial measures that I have already taken at personal expense to mitigate the aircraft noise from DCA. I was awoken at 5:53 AM despite having double-glazed and soundproofed the windows of my home. I was awoken at 5:53 AM despite the white-noise machine that I have had to install, and which was then running at its highest setting. 4. Since this is your area of expertise, you are undoubtedly aware of the epidemiological studies made of populations in similar circumstances. For example, I expect that you know of the many studies of populations living in audible proximity to airport take-off-and-landing corridors, which disclose that the incidence of coronary-vascular diseases in those populations is substantially higher than in surrounding areas. Alarming, the average life expectancy of people living in the affected areas could be years shorter than lives in comparable populations. For example, see: https://www.theguardian.com/science/2013/oct/08/aircraft-noise-pollution-heart-disease-stroke https://www.bmj.com/content/347/bmj.f5432 https://www.ncbi.nlm.nih.gov/pubmed/24103537 file:///D:/Downloads/13318_ReviewofSAHSUstudy_Stansfeld_Grimwood_Berry_Final.pdf I have no doubt that your concerns about potentially shortening the lives of citizens is great, regardless of whether the threat comes from noise-inflicted disease or from the possibility of a plane crashing into a residential area. Whenever the resultant odds of inflicting death or serious injury on a surrounding population are substantial, and the expected offsetting benefits are miniscule, you would decline to implement regulatory changes. Clearly the proposed measures, further shifting serious health burdens onto populations living in the surrounding communities—and possibly taking years off their lives—in return for no appreciable increase in the benefit of governmental security, are disproportionate. They would genuinely serve no compelling governmental purpose. Thank you for your continuing close consideration of the health and safety of citizens.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
474	<p>I’m very concerned about the increased airplane noise over North Arlington. It is a significant increase both in frequency and appears at time to be louder (lower flying?). It is disturbing, particularly early in the morning including on weekends.</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
475	<p>The noise from aircraft flying over our home has increased and is impacting our family. It seems reasonable to all home owners in the area to request that aircraft follow the river to decrease the already heavy impact from aircraft in the area. Please help us !!</p>	<p>Comment noted, refer to Topical Responses for Noise, Need for the Proposed Actions, and Results of HOLTB.</p>
476	<p>This morning, March 2, and for several weeks now, I have been experiencing much more airport-generated noise than usual. This appears to be from extra flights over our neighborhood. I hope this can be dialed down so that not so very many more flights go over my neighborhood.</p>	<p>Comment not directly relevant to the proposed project.</p>
477	<p>aircraft noise: To follow up on our recent email about the new north-bound departing flight procedure (HOLTB) at DCA that went into effect on January 31, 2020, I am writing to let you know that I am negatively impacted by this new flight procedure. I want to believe that my complaint about these flight changes should help in making progress to resolve this difficult and frustrating issue.</p>	<p>Comment noted, refer to Topical Responses for Noise and Results of HOLTB.</p>
478	<p>I live along the river in an area which is affected by aircraft noise, particularly the north flow departure. I am supportive of this change to reduce breaches of no fly zones. I have not personally noticed a difference in noise level during this trial period, it seems similar. I also support an equitable 50-50 split in north and south flow departures and limits on new slots and size of aircraft during late night and early morning hours to reduce likelihood of being awoken by aircraft noise. Other noise remediation ideas should also be considered as recommended by subject matter experts.</p>	<p>Comment noted</p>

Date**Letters Received for Proposed Actions (Letters Attached below in Attachment C)****FAA Response**

10/29/2019	U.S. Representative Mr. Don Beyer	Comment noted, refer to Topical Responses for Community Engagement and Level of NEPA review
11/6/2019	Arlington County Board, Mr. Christian Dorsey	Comment noted, refer to Topical Responses for Community Engagement, Section 106, and Level of NEPA review
12/31/2019	Maryland Office of Attorney General, Mr. Brian Frosh	Comment noted, refer to Topical Responses for Community Engagement, Section 106, and Level of NEPA review
3/20/2020	Mr. Don Crockett Comment via Mailed Letter #1	Comment noted, refer to Topical Responses for Air Quality, Noise,
3/25/2020	D.C. Fair Skies Coalition	Comment noted, refer to Topical
3/26/2020	Maryland DOT Aviation Administration, Mr. Ricky Smith	Comment noted, refer to Topical Responses for Noise, Section 106, and Level of NEPA review
3/30/2020	District of Columbia Attorney General's Office	Comment noted, refer to Topical Response for Level of NEPA review
3/30/2020	Arlington County Board, Ms. Libby Harvey	Comment noted, refer to Topical Responses for Noise, Community Engagement, Impact of COVID-19, Level of NEPA review and Need for the Proposed Actions
4/16/2020	Montgomery County Quiet Skies Coalition	Comment noted, refer to Topical
6/13/2020	Mr. Don Crockett Comment via Mailed Letter #2	Comment noted, refer to Topical Responses for Section 106,

DONALD S. BEYER, JR.
8TH DISTRICT, VIRGINIA

COMMITTEE ON WAYS AND MEANS
COMMITTEE ON
SCIENCE, SPACE, AND TECHNOLOGY
JOINT ECONOMIC COMMITTEE

Congress of the United States
House of Representatives
Washington, DC 20515-4608

WASHINGTON OFFICE:
1119 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-4376

DISTRICT OFFICE:
1901 N. MOORE STREET
SUITE 1108
ARLINGTON, VA 22209

AOA Log In
received
Oct. 29, 2019

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

Dear Administrator Dickson,

I write with concerns about the “Prohibited Area 56 National Security Project” that the FAA and the U.S. Secret Service (USSS) presented to the DCA Community Noise Working Group (CWG) this past spring. I understand that the proposal would alter Runway 19 approach and departure procedures at Washington National Airport (DCA) in order to reduce incursions into restricted airspace. However, I remain concerned about the process – specifically, the failure to give meaningful consideration to community interests – involved in a decision that will further concentrate the airplane noise in Arlington, Virginia.

The FAA knows very well that the CWG would have reactions to any changes in flight paths surrounding DCA and deserves an opportunity to engage – the very reason the group was created. Further, the FAA should know that the absence of an environmental review—and lack of community engagement regarding the noise impact of proposed changes—circumvents the normal process and would not be well-received by the CWG and the rest of the community impacted.

Your staff stated during the May CWG presentation that the FAA was notified by USSS about restricted airspace incursions and was asked to take action in August 2018, and that following this notice, the FAA invited commercial airlines to provide input on how to address the incursions in December 2018. In stark contrast, the CWG was not notified of the decision until the FAA’s presentation on May 23, 2019 regarding the plan to move a waypoint on RNAV departures from the middle of the Potomac River into Virginia, and only then was given an opportunity to respond.

Further, the FAA announced at the May CWG meeting that a new RNAV (GPS) approach procedure would be implemented on August 15, 2019, and that no consideration would be given to impact on affected communities, nor would there be opportunities to address these changes. Considering that the procedure in question has been proposed to the CWG in the past and was repeatedly rejected because it would further concentrate air traffic over neighborhoods and schools in Maryland, Virginia, and DC, this announcement was particularly astounding.

The regional delegation has since learned that the FAA is carrying out this plan by using a categorical exclusion to overlay an RNAV (GPS) procedure on top of the existing Runway 19 approach procedure in order to bypass regulations outlined in the National Environmental Policy Act. Additionally, at the May CWG meeting, members of the CWG noted that it appears the FAA is using the USSS's directive to make changes that would circumvent the CWG and current court proceedings as well. Numerous CWG members noted their frustration that although the FAA has long heard its concerns and ideas for community improvement, the FAA is making swift changes on behalf of the USSS but not using this also as an opportunity to make the flight path changes that the CWG has been recommending for years.

In the FAA's May presentation to the CWG, there was minimal information detailing the incursions prompting the "Prohibited Area 56 National Security Project" changes, so accordingly, I am requesting detailed information from 2010-2018 regarding incursions into the restricted airspace:

1. How many incursions into restricted airspace have occurred on arrivals?
2. How many incursions have occurred on departures?
3. Of the total number of approach incursions, did any incursions result in an aborted landing, a missed approach, and/or a go-around?
4. What was the FAA's determination of the cause of each incursion?

I look forward to your prompt responses, as the January 2020 deadline quickly approaches for the proposed RNAV (GPS) procedure.

I join my Maryland colleagues 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, as well as considering the concerns of the affected communities per standard environmental review process.

I look forward to working with you on addressing the pervasive airplane noise in our communities, in addition to other issues pertaining to Washington National Airport.

Sincerely,

Donald S. Beyer Jr.



ARLINGTON COUNTY, VIRGINIA
OFFICE OF THE COUNTY BOARD

2100 CLARENDON BOULEVARD, SUITE 300
ARLINGTON, VIRGINIA 22201-5406
(703) 228-3130 • FAX (703) 228-7430
E-MAIL: countyboard@arlingtonva.us



KENDRA JACOBS
CLERK TO THE
COUNTY BOARD

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ERIK GUTSHALL
MATT DE FERRANTI

November 6, 2019

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 MWAA.

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, flowing style.

Christian Dorsey, Chair
Arlington County Board

BRIAN E. FROSH
Attorney General



County Attorney's Office
JAN 6 2020 AM 9:06

ELIZABETH F. HARRIS
Chief Deputy Attorney General

CAROLYN QUATTROCKI
Deputy Attorney General

STATE OF MARYLAND
OFFICE OF THE ATTORNEY GENERAL

FACSIMILE NO.
410-576-7036

WRITER'S DIRECT DIAL NO.
410-576-6311

December 31, 2019

Ms. Jennifer Solomon
Regional Administrator
Eastern Region
Federal Aviation Administration
1 Aviation Plaza
Jamaica, NY 11434-4809

Dear Ms. Solomon:

Thank you for your letter of November 21, 2019, regarding proposed changes to flight procedures at Ronald Reagan National Airport (DCA). As you know, prior changes to DCA flight procedures have adversely affected Maryland residents and property and created substantial controversy. I am pleased, therefore, that you have committed to perform an environmental analysis of the new proposed changes. Careful study and public review of further changes is essential in order to assure that decisions are made with a full understanding of environmental impacts on residents, parks, historic resources, and recreational facilities. Because changes of the type you describe are controversial on environmental grounds, it would be inappropriate and inconsistent with agency policy to rely upon a Categorical Exclusion to complete environmental analysis. See FAA Order 1050.1F Ch. 5. It was for that reason that I asked in my May 30 letter for specific information on how to submit comments on the environmental impacts of the proposed procedures. Although your letter explained that the IFP Gateway is no longer the appropriate channel for providing environmental comments, your letter did not indicate how interested parties may do so or whether we should wait for the release of a draft Environmental Assessment. I again ask that you keep my office informed of the environmental review process, and in particular provide specific information on how, and when, to submit comments on the proposed changes.

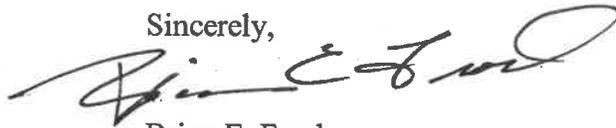
I note that one of the potential changes you mention is the creation of a new RNAV GPS arrival procedure for Rwy 19 that would overlay the current RNAV RNP arrival procedure for Rwy 19. The current RNAV RNP procedure, which was implemented without any documented environmental review or public process, directed flights over residential areas, historic properties, parks, and recreational areas in Montgomery County, MD. The proposed RNAV GPS procedure would lead to further increases in noise and controversy by moving additional flights over those protected areas. Because of the impact of moving flight paths over Maryland, and the high level of public controversy regarding those changes, FAA regulations require that the agency prepare an Environmental Assessment or Environmental Impact Statement to assure that those impacts are fully disclosed and studied, and alternatives are fully and publicly considered.

Ms. Jennifer Solomon
December 31, 2019
Page 2

It is particularly important that all affected and interested parties have a meaningful opportunity to review and comment on the proposed changes. In addition to affected members of the public, the FAA must inform organizations which have previously expressed concern over the impact of noise from DCA flights on Maryland residents and resources of the proposed changes. These organizations include Quiet Skies Montgomery County, the Maryland Department of Natural Resources, the Reagan National Community Noise Working Group, and Montgomery County, Maryland. I have copied those organizations on this letter and ask that you keep my office and those organizations, as well as the general public, informed of further revisions to DCA flight procedures and the environmental review process the FAA will employ to evaluate those proposed changes.

Thank you for your continued cooperation in this matter.

Sincerely,



Brian E. Frosh
Attorney General of Maryland

cc: Quiet Skies Montgomery County
Maryland Department of Natural Resources
Reagan National Community Noise Working Group
✓ Montgomery County, Maryland

Federal Aviation Administration, ATTN: AJV-E25
1701 Columbia Avenue,
College Park, GA 30337
VIA USPS Priority Mail, March 20, 2020

**COMMENTS ADDRESSING THE FAA'S FEBRUARY 27, 2020
PROPOSAL, TO MOVE ITS NORTHBOUND RNAV FLIGHT PATH 784
FEET TO THE WEST IN AN ATTEMPT TO ELIMINATE THE EVER-
INCREASING INCURSIONS BY COMMERCIAL AIRCRAFT INTO
PROHIBITED AREA 56¹**

AND

**DEMAND THAT BEFORE ENTERING ANY FINAL ORDER IN ITS
PENDING "HOLTB" ADMINISTRATIVE PROCEEDING, THAT THE FAA
BELATEDLY CONDUCT A THOROUGH ENVIRONMENTAL
ASSESSMENT OF THE AIRCRAFT NOISE, POLLUTION, AND P-56
PROBLEMS THAT ITS UNLAWFUL ROUTE MOVEMENTS IN 2011 AND
2015 INFLICTED ON HISTORIC GEORGETOWN AND THE NATIONAL
MALL.**

PREFACE

In 2015, the Federal Aviation Administration (FAA) moved the vast majority of its historic 75-year-old National Airport (DCA) northern departure flightpath more than 3000 feet east from Arlington, Virginia, across the Potomac River to the District of Columbia (D.C.). As discussed *infra*, the FAA cleverly and deceptively concealed the proposed flightpath movement from all elected D.C. officials and residents. As a result, in the Summer of 2015, when D.C. residents experienced the full brunt of the aircraft noise pounding them from the new flightpath, D. C. leaders were shocked to learn they had been deceived; the FAA was inundated with complaints; and residents appealed to the United States Court of Appeals for the D.C. Circuit. *Citizens*

¹ The FAA's "Community Involvement-DCA-P-56" announcement states that it is inviting comments on environmental concerns "about the temporary procedure." These comments, however, are primarily directed to any permanent procedure that the FAA may ultimately decide to implement in order to solve the enormous aircraft noise, pollution, and P-56 problems it created by implementing its LAZIR procedure in the first place. A Categorical Exclusion (CATEX) is obviously authorized for this six-month test of HOLTB and would be authorized for further testing after all routes have been switched over to the current HOLTB at the end of July. A CATEX, however, cannot be lawfully employed to make HOLTB permanent. Instead, an EA is required.

Association of Georgetown v. FAA, U.S. Court of Appeals for the District of Columbia, Docket No. 15-1285.

In response to those events, the FAA hurriedly established a Community Working Group (CWG), within the Metropolitan Washington Airport Authority (MWAA), to deal with the torrent of complaints. Then, also within weeks, in an attempt to mollify D.C. residents, the FAA proposed moving the LAZIR flightpath part of the way back to the original flight path with a new route it called LAZIR B. At one of the first CWG meetings in 2015, FAA's Senior Vice President for Mission Support Services, Lynn Ray, candidly admitted to the CWG that: "Noise cannot be eliminated, and absent a safety and efficiency purpose and need, done with all associated NEPA review and requirements, **we simply cannot shift it from one community to another just because one community believes it is fairer to do so (sic)**"

Yet "shifting" aircraft noise from one community to another is precisely what the FAA accomplished in 2015, by deceptively keeping D.C. officials and residents completely in the dark until its unlawful "shifting" was a fait accompli. Indeed, the FAA's **only** reason of record for moving the flight path was to accommodate political pressure by powerful Virginia politicians who wanted to please their constituents by moving the aircraft noise away from Virginia and over to the District of Columbia. To this day, the FAA, has failed to point to a single legitimate or lawful basis for moving the historic flightpath away from commercial Arlington, where it had been for 75 years and across the Potomac River to the District of Columbia and the National Mall.

To the contrary, from the day it was first introduced, the FAA's current circuitous LAZIR route was in direct violation of Section 213 of *the FAA Modernization and Reform Act of 2012*, which requires all RNAV routes to: (1) reduce fuel consumption, (2) aircraft emissions, and (3) aircraft noise. The FAA's circuitous LAZIR route, however, unlawfully increases all three criteria, contrary to the specific language and legislative intent of the *Modernization Act*.

Recently, however, the FAA has been forced to deal with the unintended consequences of its earlier flightpath movement and address the following intractable problems: First, the ever-increasing multiple aircraft incursions into Prohibited Area-56 (P-56). Second, the jet exhaust deposits on the historic monuments on the National Mall. Third, the unwarranted and unnecessary aircraft noise on the Nation's most important tourist destination, the National Mall. Finally, the unjust infliction of aircraft noise on Historic Georgetown and other § 4(f) properties near the flightpath.

Accordingly, the time has finally arrived for the FAA to acknowledge its mistakes and return the RNAV flightpath to Virginia – as a partial overlay of the original “NATIONAL 328” flightpath². In order to lawfully move the flightpath, the FAA must first conduct the competent and thorough Environmental Assessment (EA) it should have conducted before it created its new LAZIR route on March 12, 2011.

A BRIEF HISTORY OF NATIONAL AIRPORT’S NORTHERN DEPARTURE FLIGHTPATH.

National Airport opened in 1941. For the next 70 years, DCA’s sole northern departure flightpath, called "NATIONAL," followed a straight compass azimuth of 328 degrees over the Pentagon, Arlington National Cemetery, and the commercial high-rise section of Rosslyn, Virginia, before intersecting the Potomac River northwest of the Georgetown Reservoir. Consequently, every purchase and sale of real property, and all new construction in Arlington [including the Pentagon, Arlington National Cemetery, and Rosslyn high rise buildings] since 1941 have been undertaken with full knowledge that the properties were under the only northern departure flightpath from National Airport. Thus, all new buildings, including the Pentagon and the Arlington high-rises, were designed and built to co-exist with the aircraft noise and pollution historically generated by the NATIONAL 328 flight path. Real estate rules required all persons who purchased real property to be expressly advised in writing, before purchase, that they were under the only existing northern flightpath out of DCA. Federal law also prohibits anyone moving into a neighborhood under an existing flight path from bringing any legal action against the government or the airport operator because of aircraft noise or pollution.

Unlike Arlington, real estate transactions in Historic Georgetown were never affected by aircraft noise issues because there were no such issues. Moreover, in 1950, Congress designated Historic Georgetown as a National Landmark and charged the U.S. Commission of Fine Arts with responsibility for insuring that all buildings in Historic Georgetown retained their original historic character, such as tile roofs and single-pane windows and prohibited exterior modification of those buildings without the express approval of the Commission. Thus, unlike Arlington, where almost all of the buildings under the flight path are new and insulated to block aircraft noise, the

² Ironically, shortly after the new LAZIR flightpath was first implemented on February 12, 2011, Bob Laser of the FAA sent an email to his superior, incorrectly stating that “The LAZIR and HAMMI are essentially direct overlays of existing departure procedures.” While the HAMMI departure to the south was a direct overlay, the LAZIR departure to the north moved the flightpath more than 3000 feet to the east, thereby precipitating the incursions into P.56.

historic buildings and homes in Georgetown cannot be modified to block aircraft noise.

On March 12, 2011, more than 70 years after DCA opened, under political pressure from Virginia politicians, the FAA surreptitiously implemented a new area navigation (RNAV) flight path called LAZIR, with "zero" public notice, opportunity for comment, or environmental review. That new flight path was designed for the sole purpose of moving the aircraft noise and pollution away from commercial Arlington and across the Potomac River to Historic Georgetown and the National Mall. That circuitous route went from Runway 1 directly to the middle of the Potomac River, then over Georgetown University and MacArthur Boulevard in Northwest DC, before turning West to the new waypoint in Virginia called BEBLE. Because the sole purpose of the new procedure was to move the historic aircraft noise from Virginia to the District of Columbia, it was unlawful under FAA regulations. *See, e.g.,* FAA Order JO 7400.2G. That new flight path also violated Section 213 of the *FAA Modernization and Reform Act of 2012*, that requires all RNAV routes to reduce fuel consumption, aircraft emissions, and aircraft noise. The new circuitous LAZIR route unlawfully increased all three criteria, contrary to the precise language and legislative intent of the *Modernization Act*.

The new LAZIR route was also unlawful because it was based solely upon an inapplicable Categorical Exception (CATEX): FAA Order 1050.1E Section 5-1 (7). The FAA official who signed that CATEX disingenuously asserted that the new route over Historic Georgetown and vicinity would have no "impact on noise levels of noise sensitive areas." Historic Georgetown is, of course, a "noise sensitive area." Moreover, the 2010 Annual Aircraft Noise Report by the Metropolitan Washington Airport Authority (MWAA) recorded actual monthly DNL levels at its noise monitor in Georgetown that ranged between 60.2 DNL to 65.9 DNL. Accordingly, the official's assertion was clearly false because the FAA knew, or certainly should have known, that there would be an enormous noise and pollution impact on Historic Georgetown and the National Mall. The FAA compounded those regulatory violations by failing to notify and seek comment from D.C. elected officials, officials of the National Park Service, and the Architect of the Capitol. The FAA was also negligent, if not dishonest, in failing to anticipate that moving the historical flight path 3000 feet closer to P-56, would cause numerous inadvertent incursions into that Prohibited Area and inflict aircraft noise and pollution on the National Mall.

In the summer of 2013, many Georgetown residents noticed planes flying over their homes instead of over Rosslyn. In response to their aircraft-noise complaints, D.C. Council Member Jack Evans wrote a letter in October 2013, to the Chairman of

the MWAA complaining of an apparent new flight path. The Chairman, however, responded on November 14, 2013, that, after conferring with the FAA, there had been no changes in the northern flight paths since 2008. Because the FAA had secretly created LAZIR in 2011, and aircraft were still flying it, that statement was false and designed to deceive Council Member Evans and keep community leaders in the dark.

Coincidentally, at that very time, and unbeknownst to the D.C. Mayor, the D.C. City Council, or the community at large, the FAA had just completed a year-long Environmental Assessment (EA) for the “Washington D.C. Optimization of the Airspace and Procedures in the Metroplex” (D.C. Metroplex). As part of that five-state “optimization” proceeding, the FAA had proposed moving all northern RNAV departures from NATIONAL 328 to its newly created and unlawful LAZIR route that the MWAA chairman claimed didn’t exist. Had the elected D.C. government officials received either the initial FAA Notice or a copy of its later Draft EA June 2013, they could have taken several steps to thwart the unlawful movement of the flightpath from commercial Arlington to residential D.C. They could have engaged aviation experts to review the clearly defective EA. Those experts would have discovered that the FAA’s computer model had predicted “significant” increases in aircraft noise in many parts of Georgetown³. The FAA’s Draft EA, however, falsely asserted that there were no such “significant” aircraft noise increases at historical sites and 4(f) properties in Georgetown and vicinity.

The FAA contractor using the FAA’s NRIS computer model, ATAC Corp., modeled the “existing” and “predicted” noise impacts upon most, if not all, historical resources in Georgetown. *See*, Aircraft Noise Technical Report, June 20, 2013. Appendix 4. That model had never been validated with actual on-ground measurements. A close examination of the data in that report demonstrates that the model’s accuracy decreases the closer the measured location comes to the flightpath. For example, the model predicted that aircraft noise at Healy Hall on the Georgetown campus, which is directly under the new LAZIR flightpath, would increase only by 2.7 DNL. At Dumbarton Bridge, however, which is more than a half mile further away from the flightpath, the predicted increase was 5.2 DNL. The model did, in fact, identify more than seven historic locations in Georgetown that would suffer increases of more than 5 DNL, the level of “significance.” The FAA disguised and ignored those “significant” increases by means of an estimated “fudge factor” it

³ The model actually predicted an increase of 5 or more DNL (from existing to proposed) for at least seven 4(f) properties in Georgetown and between 4 and 5 DNL for dozens more.

called the “no action alternative,” thereby deceiving anyone not intimately familiar with the model⁴.

The Court of Appeals recently issued an opinion in a similar case in which the FAA had established a new flightpath over historic communities in Phoenix, Arizona, without involving elected city officials. In reversing the FAA’s orders for that new flightpath, the Court held:

[T]he agency must ask local governments who their authorized representatives are and . . . the FAA's failure to notify and provide documentation to the City of the agency's finding of no adverse impact violated regulations under the Preservation Act and denied the City its right to participate in the process and object to the FAA's findings.

City of Phoenix v. Huerta, 869 F.3d 968 at 971 (D.C. Cir. 2017), *opinion amended on reh'g*, 881 F.3d 932 (D.C. Cir. 2018). The *Phoenix* court further held that the FAA's failure to involve city leaders and officials in its EA was arbitrary and capricious, and required vacatur of the new routes.

In the Metroplex EA, the FAA expressly excluded all elected D.C. officials and kept them in the dark until the “shifting” of the aircraft noise was a fait accompli. Indeed, the FAA omitted the names of all elected D.C. officials from its mailing lists so that no elected D.C. official received a copy of the FAA’s original January 2013 Notice of the Metroplex proceeding that went out to officials in every jurisdiction **except the District of Columbia**. In June 2013, the FAA mailed copies of its Draft EA to more than 450 elected state and local officials and libraries in the five-state area. **Not a single notice or draft EA was sent to any elected official in the District of Columbia government or any D.C. Library**. As a result, D.C. officials were completely unaware of the FAA’s unlawful plan to transfer the vast majority of

⁴ There were also large discrepancies between the FAA’s before-and-after 2013 model estimates and the actual measurements taken by D.C. in 2018. For example, the model estimated an existing DNL in 2011 of 54.9 and predicted a DNL in 2013 of 56.6 for Healy Hall. That was erroneous. Recorded on-ground measurements in 2018 at Healy Hall showed an actual DNL of 62.3 – an increase of 7 DNL on a historic structure, which was “significant.” See, D.C. Airplane Noise Assessment Final Report, September 2018 at p. 59. Moreover, MWAA’s Annual Noise Report in 2010, of which the FAA should have been aware, showed actual measured monthly DNL at the Georgetown noise monitor of between 60.2 and 65.9, which meant that even an increase of 1.5 DNL in that area would have been “significant.” The FAA ignored that actual data and instead reported only the disguised data produced by its hugely inaccurate and unvalidated model.

DCA's historic aircraft noise from commercial Arlington to the National Mall and residential D.C.⁵.

On December 12, 2013, the FAA concluded its defective Metroplex proceeding and, with respect to the issues affecting the District of Columbia, issued a clearly erroneous Finding of no Significant Impact (FONSI/ROD). That FONSI/ROD was again sent to more than 450 elected officials, but not to any elected official of the District of Columbia. Despite Council Member Evan's earlier formal inquiry about the mysterious new flight path over Georgetown, no representative of MWWA or FAA informed him or any elected D.C. official, of the ongoing Metroplex proceeding, of the draft EA, or of the FONSI/ROD that concluded the Metroplex proceeding. The only notice provided by the FAA to DC residents and government officials was a small, wholly uninformative, one-time legal notices in the December 2013, editions of the Washington Post and Baltimore Sun.

In early 2015, before the FAA implemented its new flightpaths, the United States Secret Service (USSS) apparently expressed serious doubts about the ability of pilots flying so close to P-56 to avoid encroaching the Prohibited Area. In response to that concern, the FAA conducted a "test" of the new LAZIR route during February and March 2015. That "test" apparently satisfied the USSS and allowed the FAA to subsequently implement all of its new routes that used LAZIR as the initial segment.

In the Summer of 2015, when the FAA ultimately implemented all of its new flight paths, the torrent of complaints from the victims of the new aircraft noise forced the FAA to recognize the severity of the problem it had created in the District of Columbia. In response, the FAA quickly proposed moving the LAZIR flightpath part of the way back to NATIONAL 328 with three alternative routes it called LAZIR A, B, and C. In 2016, the FAA settled on the alternative LAZIR B route and held public open houses in D.C. and Virginia to explain how LAZIR B would affect aircraft noise levels on both sides of the Potomac River. The District of Columbia, however, insisted that the FAA also consider moving the LAZIR flightpath back to a partial overlay of NATIONAL 328. In response, the FAA designed, developed and tested a new route that would simply eliminate the ADAXE way point and require all RNAV equipped aircraft to fly in a straight line from the runways to the BEBLE waypoint.

⁵ The FAA did provide the DC State Historic Preservation Officer (SHPO) with a copy of the draft EA because the FAA was specifically required to obtain his approval. To obtain that approval, the FAA official misrepresented to that office that there would be no adverse effects from the proposed changes in the northern flightpath.

As the FAA should have anticipated: (1) D.C. residents submitted comments supporting the movement back to the 328 radial and uniformly rejecting the half-measure and demanding that the flightpath be moved back to where it had been for 75 years. (2) Arlington residents uniformly submitted comments opposing the same half-measure. Rather than taking the action necessary to resolve the problem by finally conducting a legitimate EA, the FAA, in January 2017, inexplicably “discontinued” its LAZIR B proposal.

In 2018, the Court of Appeals for the District of Columbia Circuit, dismissed the residents’ appeal without reaching the merits of the case. *Citizens Ass’n of Georgetown*, 896 F.2d 425 (D.C. Cir. 2018). The Court concluded, erroneously in our opinion, that even though the FAA failed to notify elected D.C. officials, and even though D.C. officials and residents were completely unaware of the Metroplex proceeding, the FAA’s legal notice published in the Washington Post and the Baltimore Sun in December 2013, was sufficient to start the 60-day statute of limitations running for the Metroplex proceeding and that the residents had failed to show “reasonable grounds” for having failed to appeal within those 60 days. That opinion was also in direct conflict with the Court’s earlier opinion in *Phoenix*⁶.

THE ENDEMIC PROBLEM OF EVER-INCREASING INCURSIONS INTO PROHIBITED AREA 56.

By 2018, the number of aircraft incursions into P-56 had increased to over 300 with 57 incursions in 2018 alone. Accordingly, the USSS demanded that the FAA take action to “eliminate” those incursions. In response to that demand, the FAA convened a group consisting solely of USSS and airline representatives to secretly evaluate the P-56 problem (including noise over communities) and make recommendations. However, local and state government representatives, as well as other impacted Federal agencies and the CWG, were excluded from those secret proceedings that ultimately resulted in the current HOLT B proposal. Accordingly, it is not surprising that the FAA’s current HOLT B proposal is, at most, an inadequate half-measure that neither eliminates P-56 incursions nor rectifies the gross injustice that the FAA inflicted upon the District of Columbia and the National Mall in 2015.

⁶ It must be noted that because the LAZIR flightpath could and would reduce real estate values in Georgetown and vicinity, the Court’s conclusion that a legal notice in a newspaper was sufficient to notify property owners that their rights to protect their property values by appeal would expire within 60 days of the newspaper notice was likely unconstitutional. See, *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S.306 (1950).

On January 30, 2020, the FAA implemented a six-month test by moving only one of the eight existing RNAV routes to its newly designed northbound HOLT B departure procedure. That new test route moves the current RNAV ADAXE waypoint, located in the Potomac River near Roosevelt Island, some 784 feet west to a new waypoint called REVGE directly above the North Lynn Street approach to Key Bridge in Arlington, Virginia. The FAA states that if the six-month test demonstrates that the new route will prevent northbound aircraft from entering Prohibited Area 56 (P-56), it will permanently move all northbound RNAV flights to what is now the new HOLT B route. Therefore, the language of the notice implies that if there are no incursions from the new route, it will be made permanent without any actual knowledge or measurement of actual noise impacts on the communities below.

In our view, the FAA is required in its HOLT B proceeding, as a matter of law, to review and consider any and all available options for solving the P-56 incursion problem. As in any proceeding to move a route, the FAA is also obligated to consider noise and impacts on historic and 4(f) properties. The most obvious option to stop incursions would be to simply move all northbound traffic back 3,000 feet to the Historic 328 radial – where P-56 incursions were rare and historic properties in D.C. were not adversely affected. That, of course, would provide the USSS with much greater protection against inadvertent incursions into P-56, which the FAA obviously failed to properly take into account before implementing its drastic, unsupported and unlawful new LAZIR flightpaths in 2015. Moreover, that would, at long last, bring the northern RNAV departure procedure into compliance with the *Modernization Act*.

Like any administrative agency, the FAA is required to consider all “relevant factors” and then set forth a valid “rational basis” for any and all decisions it chooses to adopt. To this day, however, the FAA has failed to set forth any such “rational basis” for its proposal to move the existing waypoint merely 784 feet to the west, rather than any of the alternative waypoints it designed and proposed in 2015-16. Including, of course, as D.C. residents demand, a movement back to the original NATIONAL 328 where it had been since 1941. Indeed, while the FAA and the airlines purportedly considered effects on communities, community representatives were excluded from the secret discussions. Moreover, the FAA has failed to inform either the CWG or the public of the options, if any, that were discussed, evaluated, and/or rejected in the secret meetings. As a result, the underlying evidence, if any, upon which the FAA based its decision to move the ADAXE waypoint merely 784 feet to its new REVGE waypoint, rather than 1500, 2000, or 3000 feet West, remains a secret administrative mystery.

BEFORE THE FAA CAN MAKE ITS NEW HOLT B ROUTE PERMANENT, IT MUST CONDUCT ITS LONG-OVERDUE ENVIRONMENTAL ASSESMENT OF THE AIRCRAFT NOISE AND POLLUTION IMPACTS ON THE RESIDENTS AND GOVERNMENT FACILITIES ON BOTH SIDES OF THE POTOMAC RIVER.

Should the FAA's six-month test demonstrate the elimination of P-56 incursions by aircraft flying HOLT B, the FAA proposes to make HOLT B permanent and move all RNAV traffic to that route⁷. The FAA may be tempted to accomplish that by issuing a CATEX, such as § 5-6.5q of Order 1050.1F. In our view, however, there are significant environmental issues, as well as regulatory "Extraordinary Circumstances," that require the FAA to first conduct the EA it should have, but did not conduct in 2011, 2015, and 2017 – with full community, local, and Federal government involvement.

Moreover, to this point, the FAA has conducted the instant P-56 administrative proceeding in complete secrecy without any input whatsoever from the thousands of people, businesses, and governmental entities that may be negatively or affirmatively affected by the proposed change. Accordingly, those of us who now live under the new LAZIR flightpath would like to know precisely why: (1) Local government and residents have thus far been excluded. (2) The FAA has proposed moving the ADAXE waypoint merely 784 feet west rather than to any of the waypoints it previously designed for LAZIR A, B, or C. (3) The FAA has not proposed simply eliminating the ADAXE waypoint entirely and moving the RNAV flightpath back to a partial overlay of the 328 radial where the P-56 problem did not exist⁸. In our view, the FAA must set forth the precise reasons and evidence that support its proposal to move the flightpath merely 784 feet west to the new REVGE waypoint.

Since the FAA implemented LAZIR in 2015, much new data and information has been obtained by the District of Columbia. In 2016, the D.C Mayor and City Council submitted an Administrative Petition to the FAA, demanding, inter alia, the return of the unlawful LAZIR route to the 328 radial. The FAA informed the City that

⁷ That sample "test path," of course, was set up solely to detect P-56 incursions from the few aircraft flying the HOLT B route. In order to determine aircraft noise and pollution impacts on historical and 4(f) properties, another test will have to take place after all aircraft are flying the HOLT B route. The validity of the ongoing test is further in doubt and of dubious validity due to the drastic reduction in air traffic caused by the corona virus pandemic.

⁸ John Belk at FAA HQ designed such a route that simply eliminated ADAXE, and presented it, as a viable option, to the CWG in 2016.

it would consider D.C.'s Administrative Petition in the course of its LAZIR B proceeding. Later that year, in a partial response to that Petition, the FAA actually designed, tested, and presented to the CWG, a new RNAV flightpath that would simply omit the ADAXE waypoint and require aircraft fly from the runways directly to BEBLE. That, in effect, was an RNAV overlay of NATIONAL 328, that would bring the route back into compliance with the *Modernization Act*. Since that time, and to this date, however, the FAA has failed to respond to any of the requests and demands in that Petition and the new route design for an overlay has been dormant.

In 2017, after the FAA failed to take any action, the District of Columbia commissioned an expert study of the adverse aircraft noise impacts inflicted by Virginia and the FAA on the District of Columbia by the LAZIR flightpath. That expert aviation team concluded that the flight path movements in 2011 and 2015 were unlawful in many respects. Accordingly, the team recommended that the FAA institute proceedings to require all RNP and RNAV traffic revert to a straight-line flight path from the Airport to the existing BEBLE waypoint on the Virginia Side of the Potomac River. In other words, a basic overlay of the historic NATIONAL 328 route. That would also move the northern RNAV procedure into compliance with the *Modernization Act*. The FAA must examine the evidence and recommendations in that study before making a decision on the best flightpath to eliminate P-56 incursions and aircraft noise over historical and 4(f) properties.

Moreover, because several "Extraordinary Circumstances" in the FAA's own regulations apply to this situation, the FAA is required to conduct an EA in order to evaluate the following "Extraordinary Circumstances" set forth in § 5-2 b.:

(2) An impact on properties protected under Section 4(f). The current LAZIR flightpath negatively impacts numerous 4(f) properties, including all properties within the boundaries of Historic Old Georgetown. That negative and unlawful impact would be eliminated if the flight path were moved back to its original location.

(7) An impact on noise levels of noise sensitive areas. The movement of the flightpath would have a positive impact on the noise sensitive areas in D.C. The FAA can expect the representatives of Arlington to complain of negative noise impact on that community.

(8) An impact on air quality or violation of Federal, state, tribal or local air quality standards under the Clean Air Act. The Architect of the Capitol has formally asked the FAA to move the flight path back to the 328 radial because the

current flight path is creating chemical deposits on the surfaces of the historic monuments on the National Mall.

(10) Impacts on the quality of the human environment that are likely to be highly controversial on environmental grounds. The FAA's experience with its earlier LAZIR B proceeding demonstrates that any movement of this flightpath will be highly controversial on both sides of the Potomac River.

CONCLUSION

As a matter of national security, the incursions into P-56 must be eliminated. To accomplish that end, we submit that the RNAV flight path, which caused the incursions in the first place, must be moved back to the 328 radial where it had been for more than 75 years until the FAA unlawfully moved a small part of it in 2011 and the vast majority of it in 2015. Because the FAA "shifted" the historic aircraft noise from Arlington to the District of Columbia solely "because one community believes it fairer to do so," that shift was contrary to the FAA's own regulations and must be reversed. Both of the FAA's current and proposed flightpaths are in violation of the *Modernization Act* and must be adjusted to conform. Accordingly, the FAA must conduct an EA and thoroughly re-examine all of the environmental impacts of its current and proposed northern departure flightpaths, including the District of Columbia's 2016 proposal to move the flightpath back to the 328 radial, where it has existed since the airport opened in 1941. We have no objection to the continuation of the HOLT B testing pursuant to a CATEX until an EA is completed and a final decision can be made.



Don W. Crockett
Attorney at Law
3070 Q Street NW
Washington, DC 20007

DC FAIR SKIES COALITION

1365 Wisconsin Avenue
Washington, DC 20007
(202) 337-7313

COMMENTS ON FAA PROPOSED IMPLEMENTATION OF AIRSPACE CHANGES AT RONALD REAGAN WASHINGTON NATIONAL AIRPORT

The DC Fair Skies Coalition submits these comments on the proposed change in the northbound departure flight path from National Airport (DCA). As the FAA is fully aware from the Petition filed by the Coalition, the Mayor of the District of Columbia, and DC Council Members dated May 27, 2016 and the Petition for review filed with the US Court of Appeals for the DC Circuit in 2015 the Coalition strongly objected to the change the FAA made in the northbound flight path in 2015. It significantly increased noise over Northwest DC and was based on a flawed Environmental Assessment which the FAA conducted without notice to the public or the elected officials of the DC Government. Moving the historic flight path over Virginia to the east side of the Potomac River not only significantly increased aircraft noise for the residents of DC along the river from Georgetown to Palisades, it also resulted in incursions of aircraft into the Prohibited Zone (P-56) that includes the White House, the National Mall, and Congress.

Accordingly the Coalition strongly supports the proposal to move the flight path 784 feet west to eliminate the unacceptable threat to the national security that the current flight path poses. It should also reduce somewhat the increase in aircraft noise that the original LAZIR flight path produced. The proposal not only moves the flight path west it also requires planes to turn left nearer the airport and fly in a straight line north which will reduce the number of turns required by the current procedure. That in turn should enable planes to climb faster and reduce noise on both sides of the river. While the reduction in aircraft noise may be modest, as the FAA's noise screen suggests, it is certainly a factor that the FAA should take into account in its environmental assessment of this proposal.

A related consideration is that Georgetown and nearby communities and schools are characterized by buildings built in the 18th-early 20th centuries before there was a National Airport. As a result they are much less resistant to aircraft noise than more modern buildings. Indeed the US Commission of Fine Arts which has jurisdiction over exterior alterations in Georgetown has ruled that existing single pane windows should be restored if possible and replaced with identical single pane windows if necessary. Double pane windows are not acceptable. The DC Airplane Noise Assessment (September 2018) found that aircraft noise in DC's historic neighborhoods was increased as a result of the eastward shift in the flight path. It also found that learning in DC schools was being negatively affected by aircraft noise and that nighttime noise levels inside of northwest DC residences were high enough to awaken between 12- 33% of the population. Ronald Reagan Washington National Airport Airplane Noise Assessment, p.135.

The Coalition also supports the flight path change because the existing track results in significant aircraft generated pollution which is contributing to the deterioration of the monumental buildings on the National Mall including the Capital. We understand that the Architect of the Capital endorsed the FAA's earlier LAZIR B proposal because it would reduce air pollution.

The current proposed shift in flight path should produce a similar beneficial impact. We urge the FAA to consider this issue in its environmental assessment of the proposed change.

Because the Proposal is based on national security considerations and the anticipated environmental impacts on DC are a reduction in noise and pollution we support the Proposal. However we urge the FAA to continue working with the DCA Community Working Group to reduce aircraft noise from both departing and arriving planes. We understand that planes approaching DCA from the north using conventional flight procedures such as RIVER VISUAL also pose a national security risk because of incursions into P-56. We urge the FAA to propose a solution requiring planes from the north to use advanced navigation equipment to eliminate this serious problem.

We appreciate your consideration of our comments on this matter.

Ed Solomon

Chairman, DC Fair Skies Coalition

Richard Hinds

Counsel, Ward Two Representative to Ronald Reagan National Airport Community Working Group

Ken Buckley

Ward Three Representative to Ronald Reagan National Airport Community Working Group

On Behalf of Burleith Citizens Association, Citizens Association of Georgetown, Hillandale Homeowners Association, Foxhall Citizens Association, Colony Hill Neighborhood Association, Palisades Citizens Association, and Georgetown University

March 25, 2020

March 26, 2020

Federal Aviation Administration
ATTN: AJV-E25
1701 Columbia Avenue
College Park GA 30337

To Whom It May Concern,

The State of Maryland has reviewed the FAA's materials regarding the "National Security Request – Amended Waypoint for DCA North-flow SIDS / P56" project as posted at https://www.faa.gov/air_traffic/community_involvement/dca_p56/. Included in the review of these materials was a review of the HOLT B Standard Instrument Departure (SID) at Ronald Regan National Airport (DCA) associated with an ongoing air traffic test and associated changes to waypoints included in the HOLT B procedure that may be made permanent. As noted by the FAA, these changes if made permanent will also be included in future revisions to the DCA HORTO, CLTCH, JDUBB, SOOKI, DOCTR, REBLL, WYNGS, SCRAM, and AMEEE SIDs.

As part of the State's review of the DCA HOLT B SID, the State reviewed the FAA's Categorical Exclusion (CATEX) and noise screening analysis associated with the procedure¹. Appendix A within Attachment B of the CATEX shows the changes to the HOLT B SID at the navigational points REVGE and BEBLE. This is consistent with the text explaining the FAA's proposed procedure changes and current ongoing air traffic test. However, the Appendix also shows additional potential procedure changes that would occur as aircraft follow the Potomac River beyond BEBLE and turn to the west at a new navigational point, WP23551, near the communities of Glen Echo in Maryland and Langley in Virginia. This proposed change is not specified or referenced in the CATEX text. It is also not clear if the results of the noise screening analysis as detailed in Attachment B of the CATEX reflect these additional proposed procedure changes.

Since the additional potential proposed procedure changes related to the DCA HOLT B SID as depicted in Appendix A within CATEX Attachment B would occur over areas of Maryland, and specifically Montgomery County, the State submits the following specific comments and requests for clarification regarding the scope of analysis in the CATEX:

- Were the proposed procure changes beyond the BEBLE navigational point as depicted in Appendix A within CATEX Attachment B modeled as part of the noise screening

¹https://www.faa.gov/air_traffic/community_involvement/dca_p56/media/P56_CATEX_for_Temporary_HOLT_B_signed.pdf, November 25, 2019

analysis? *If not, the State requests that the FAA revise the noise screening analysis to include those proposed procedure changes, make the results available for comment, and extend to comment period to allow for public review and comment on the results of that noise screening.*

- If the FAA proposes to make the changes to DCA HOLT B SID permanent and include these changes with future amendments to the DCA HORTO, CLTCH, JDUBB, SOOKI, DOCTR, REBL, WYNGS, SCRAM, and AMEEE SIDs, will these permanent changes include the additional proposed procedure changes beyond the BEBLE navigational point as depicted in Appendix A within CATEX Attachment B? *If so, the State requests that the FAA prepare an environmental assessment evaluating the environmental impact of the proposed procedure changes, as required by the National Environmental Policy Act, and perform the review and analysis required by Section 4(f) of the Transportation Act and Section 106 of the National Historic Preservation Act.*
- As the FAA is aware, past changes in DCA flight procedures that moved flight paths closer to or over residential, historic, and recreational areas, or that concentrated flight paths over residential, historic, and recreational areas have been highly controversial on environmental grounds because the FAA's screening analysis did not fully account for the impact of increased flight operations on the human environment and on historic and recreational resources. Further, those impacts are themselves significant and require analysis under federal law. As the DC Circuit noted in discussing the FAA's adoption of new flight procedures at DCA, "the FAA's efforts . . . were hardly a model of sound agency practice" and "the FAA appears to have given short shrift to the required environmental analyses."² Maryland requests that if implementation of DCA HOLT B SID (or any other future changes to DCA flight procedures) will also require or lead to implementation of further changes to flight procedures over Maryland residents and historic and recreational resources, that those changes be subject to an environmental review and other analysis pursuant NEPA, Section 4(f), and the NHPA.

The State of Maryland greatly appreciates the opportunity to review and comment on the proposed changes to DCA flight procedures. The State also appreciates the FAA's efforts to inform organizations which have previously expressed concern over the impact of noise from DCA flights on Maryland residents and resources of the proposed changes. These organizations include Quiet Skies Montgomery County, the Maryland Department of Natural Resources, the Reagan National Community Noise Working Group, and Montgomery County, Maryland. I have copied those organizations on this letter and ask that you keep my office and those

² *Maryland v. FAA*, Slip Op. at 8, Case No. 18-1173 (DC Cir. March 10, 2020).

Federal Aviation Administration
Page Three

organizations, as well as the general public, informed of further revisions to DCA flight procedures such as those outlined in this letter regarding the DCA HOLT B SID and the environmental review process the FAA will employ to evaluate those and other potential future DCA proposed flight procedure changes.

Thank you for your continued cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ricky D. Smith, Sr.', written over a horizontal line.

Ricky D. Smith, Sr
Executive Director

cc: Quiet Skies Montgomery County
Maryland Department of Natural Resources
Reagan National Community Noise Working Group
Montgomery County, Maryland

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Attorney General

ATTORNEY GENERAL
KARL A. RACINE



March 30, 2020

Federal Aviation Administration
ATTN: AIV-E25
1701 Columbia Avenue,
College Park, GA 30337

RE: Comments of the Attorney General for the District of Columbia on the Federal Aviation Administration's Public Notice of Availability and Comment Period Regarding the Temporary and Proposed Implementation of Airspace Changes at Ronald Reagan Washington National Airport, Arlington, VA

To the FAA Administrator:

The Attorney General for the District of Columbia ("DC AG") respectfully submits the following comments regarding the Federal Aviation Administration's ("FAA") Temporary and Proposed Implementation of Airspace Changes ("Proposal") at Ronald Reagan Washington National Airport ("DCA") in Arlington, Virginia. The DC AG supports the general concept to change the existing departure route (LAZIR) from DCA due to incursions into Area P-56 restricted airspace over the National Mall. However, the DC AG encourages that, prior to finalizing its proposal, the FAA perform a comprehensive environmental impact assessment ("EIA") that identifies alternatives and measurable impacts to affected communities and area resources. A comprehensive EIA, subject to further public review and comment, will provide necessary transparency, informed public comment, and support for the FAA's final decision.

The DC AG submits that the contentious history regarding previous changes to DCA departure routes should inform and guide the proceedings for the FAA’s current proposal. Numerous public meetings, petitions, and legal challenges have exposed the inadequate foundations for prior decisions to change DCA departure routes. Throughout these past proceedings, the FAA has never performed a comprehensive EIA – a requirement under the National Environmental Policy Act (“NEPA”), 42 U.S.C. §§ 4321–4370m, one of a number of statutory and regulatory schemes that are designed to account for all impacts of a “major Federal action significantly affecting the quality of the human environment.” *Id.* § 4332(C); 49 U.S.C. § 40103(b)(1); Environmental Impacts: Policies and Procedures, FAA Order 1050.1F (July 16, 2015). At a minimum, NEPA requires the FAA to prepare an environmental assessment (“EA”) to determine whether the action will cause a “significant’ environmental impact,” such as by substantially increasing noise levels. 40 C.F.R. § 1508.13; *City of Dania Beach, Fla. v. FAA*, 485 F.3d 1181, 1189 (D.C. Cir. 2007) (citing 40 C.F.R. § 1508.9(a)).

Considering these statutory and regulatory mandates and citizen concerns, the DC AG encourages the FAA to perform a comprehensive EIA and provide a draft of the EIA, once completed, for review and public comment prior to both finalizing the EIA and issuing the final decision regarding the proposal. Because this proposal affects “noise-sensitive areas”, pursuant to FAA Order 1050.1F, App. B, the EIA should include a rigorous noise monitoring analysis rather than a modeled noise screen. A modeled noise screen is not a rigorous analysis, as it relies on simplistic and often unrealistic assumptions that do not reflect actual noise impacts.

The DC AG submits that no affected community should be burdened unfairly or unreasonably by the potential impacts of this proposal. The citizens of those communities are equally entitled to a complete and comprehensive public record that supports the FAA’s decision

and upon which they can articulate either their agreement or objection through informed public comment.

For these reasons, the DC AG encourages the FAA, prior to finalizing its decision, to engage in the appropriate study of all of the impacts of this proposal through a comprehensive EIA subject to public comment. To the extent necessary to complete that process, the DC AG recommends that the FAA extend its trial period to prevent further incursions into restricted air space. By considering and balancing all interests and impacts in accordance with regulatory imperatives, the FAA will promote transparency and informed public comment, alleviate procedural errors in past decision-making, and minimize future challenges of the FAA's decision.

Sincerely,



KARL A. RACINE

Attorney General for the
District of Columbia



KENDRA JACOBS
CLERK TO THE
COUNTY BOARD

ARLINGTON COUNTY, VIRGINIA OFFICE OF THE COUNTY BOARD

2100 CLARENDON BOULEVARD, SUITE 300
ARLINGTON, VIRGINIA 22201-5406
(703) 228-3130 • FAX (703) 228-7430
E-MAIL: countyboard@arlingtonva.us



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KATIE CRISTOL
MATT DE FERRANTI
CHRISTIAN DORSEY

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

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

Montgomery County

→ Quiet Skies Coalition

April 16, 2020

Ms. Jennifer Solomon
FAA Regional Administrator for the Eastern Region
1 Aviation Plaza
Jamaica, NY 11434-4848

Subject: Proposed Changes to DCA North-flow SIDS

Dear Ms. Solomon,

The Maryland communities represented by the Montgomery County Quiet Skies Coalition, Ltd. ("MCQSC") are not directly impacted by the waypoint change in temporary procedure HOLT B, and therefore do not object to the FAA's "National Security Request - Amended Waypoint for DCA North-flow SIDS / P56" posted at https://www.faa.gov/air_traffic/community_involvement/dca_p56/.

To the extent this procedure change may be made permanent and amended to include planned revisions at points beyond BEBLE, as indicated in Appendix A within Attachment B of the HOLT B CATEX, we appreciate the opportunity to provide the following feedback to the agency.

Specifically, Appendix A of the Noise Screening Analysis, entitled "DCA SIDS Alternative Route from BEBLE to CUKLI/MELOE," depicts planned changes to six westerly SIDS (CLTCH THREE, HORTO FOUR, JDUBB FOUR, REBLL FIVE, SCRAM SIX, AND WYNGS FIVE) beginning at a new navigational waypoint, WP23551 (later named RGIII). These planned changes are responsive to requests made and endorsed by the DCA Community Working Group (CWG).

MCQSC applauds the FAA for incorporating the CWG's recommendation. Currently, a number of Montgomery County communities are under both departure and approach paths and therefore endure nearly constant exposure to concentrated noise and emissions pollution. Shifting a portion of north-flow departures towards the Potomac River is a helpful first step towards the CWG request that the FAA design procedures over non-residential areas where possible, and where that is not possible that the FAA design procedures which result in a more equitable regional sharing of aircraft noise and emissions pollution.

MCQSC notes that the CATEX Declaration states:

“If FAA deems the amended HOLT B meets the purpose and need of reducing incursions into P-56, the FAA will propose the permanent implementation of the HOLT B as well as an amendment to the remaining existing north-flow departure procedures at DCA so that all aircraft follow the new REVGE waypoint. Any such proposal would be subject to a separate environmental review process under NEPA and any other applicable environmental laws or requirements.”

As part of this and any future environmental review process, MCQSC asks the FAA to take into account the pre-2015 baseline noise scenario, considering both track concentration and noise levels. As indicated above, since late 2015, Montgomery County has had both highly concentrated departure and approach procedures centered over the same residential areas. While the planned procedure changes to the six westerly SIDS should bring some relief to some of those communities, cumulative impacts to underlying communities due to the concentration of flight paths and increased frequency of overflights will continue to be dramatically higher than pre-2015 levels, and will continue to undermine daily life and public health. Further, these changes will do nothing to mitigate aircraft noise and pollution for communities under the three easterly SIDS (AMEEE ONE, DOCTR FIVE, and SOOKI FIVE); MCQSC urges the FAA to address the frequency of overflights from these procedures on impacted communities as soon as possible.

Again, we applaud the FAA’s responsiveness to the DCA CWG by incorporating changes in the six westerly SIDS beyond the ADAXE/REVGE waypoint adjustment to better avoid noise-sensitive residential areas. We hope the FAA will continue to take community noise, pollution, and health impacts into consideration when designing new procedures and modifying existing procedures. We look forward to providing more detailed comments should the FAA propose further amendments, provide additional noise screening or environmental review for the six westerly SIDS, or any other departure or approach procedure at DCA which impacts our communities.

Sincerely,

Anne Hollander and Gretchen Gaston
On behalf of the Montgomery County Quiet Skies Coalition, Ltd.

Cc: Reginald Davis, FAA Community Engagement Officer
Matt Fisher, ATC Specialist, Potomac TRACON
Curby Fowler, FAA Eastern Service Center
Brent Girard, Office of Senator Chris Van Hollen
Ken Hartman, Montgomery County, MD Regional Director
Mike Jeck, MWAA Noise Officer
David Mould, MWAA VP of Communications
Nina Weisbroth, Office of Congressman Jamie Raskin

**DON W. CROCKETT
ATTORNEY AT LAW**

3070 Q Street, N.W.
Washington, DC 20007

(202) 338-1997

don.crockett@verizon.net

Federal Aviation Administration, ATTN: AJV-E25
1701 Columbia Avenue
College Park, GA 30337

VIA USPS Priority Mail, June 13, 2020

RE: Supplemental Comments of Don W. Crockett in the HOLT B administrative proceeding.

At the DCA Community Working Group meeting on May 28, 2020, the FAA provided a project update concerning its proposed new north-flow route from DCA called HOLT B. That update states that “The FAA is also inviting comments from the public on environmental concerns they believe the FAA should consider as part of its environmental review of the proposed permanent amended waypoint pursuant to FAA Order 1F, Environmental impacts: Policies and Procedures and other applicable authorities.” In my view, this new “opportunity for comment” by other adversely affected parties appears to be window dressing for the FAA’s unlawful plan to institute a major route change without the requisite full Environmental Assessment.

I submitted my initial comments and demand for a full Environmental Assessment (EA) in the HOLT B administrative proceeding on March 20, 2020. A copy of those initial comments and demand is attached hereto. The following are my supplemental comments.

All federal agencies, including the FAA, are required to comply with the National Historic Preservation Act (NHPA) as well as Section 4(f) of the National Transportation Act. In order to comply with those statutes, the FAA must “consult” with all potentially affected jurisdictions and obtain their views concerning the potential impact on historic properties. *See, City of Phoenix v. Huerta*, 869 F.3d 968 at 971 (D.C. Cir. 2017), *opinion amended on reh'g*, 881 F.3d 932 (D.C. Cir. 2018). No such consultation was even contemplated much less undertaken in this case. Instead the FAA consulted, in secret, only with the USSS and the airlines in designing its new HOLT B route, excluding any and all community input.

The USSS and the airlines, however, do not and cannot, represent the interests of the surrounding communities and the protected historic properties in those

communities. Indeed, the interests of the surrounding communities may well be, and probably are, at odds with the objectives of the commercial airlines. Moreover, the FAA has apparently also excluded consultation with several federal agencies such as the U.S. Park Service and the Architect of the Capitol that supervise and represent the best interests of the National Mall and the surrounding federal facilities and parks. All of those facilities have been adversely affected by the unlawful movement of the historic flight path from Arlington to D.C. in 2015. Consequently, all responsible federal agencies must be consulted – in public and not in secret – before any decisions on the direction and dimensions of the new route are made.

Rather than conducting the consultations required by both common sense and the controlling statutes, the FAA now improperly assumes, on the sole basis of its obviously defective and unvalidated computer “screening tool,” that it may go forward without any community or other federal agency participation whatsoever using a Categorical Exclusion (CATEX). The FAA’s Update states that:

“The temporary procedure known as HOLT B, moved one waypoint 784 feet southwest 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**. The temporary procedure is intended to determine the effectiveness of the amended waypoint in reducing the number of incursions into P-56.” (emphasis added).

As the quoted paragraph suggests, the FAA proposes to use an unwritten “policy” of “keeping north-flow traffic over the Potomac River” as justification for its design of the new HOLT B route without any input whatsoever from District of Columbia officials – much less those officials who are actually in charge of D.C.’s huge inventory of historic properties that, since 2015, have been severely adversely impacted by aircraft noise. In its new letters to the MD and Virginia SHPO’s the FAA further explains that:

“In consultation with the Secret Service, the FAA identified amending the REVGE waypoint as a way to move aircraft away from P-56 **while still flying over the Potomac River, which is consistent with longstanding community requests to manage aircraft noise from DCA.**” (emphasis added)

The high-lighted statement is an outrageous half-truth. As the FAA well knows, the only “longstanding community requests” to have north-flow departures fly “over the

Potomac River,” were made by Virginia – not the District of Columbia or Maryland who oppose that concept. The FAA’s secret implementation of those “Virginia community requests” in 2011-2015, was contrary to its own regulations, numerous federal statutes, and basic principles of administrative law.

In response to that unlawful action, D. C.’s Mayor, City Council, and neighborhood organizations, submitted an Administrative Petition to the FAA in 2016, demanding reversal of the unlawful movement of the historic northern flight path from Virginia to the Potomac River. That basic demand in the Administrative Petition is now fully supported by a \$400,000 expert aviation study, undertaken by the D.C. government. That study recommends that the unlawful RNAV flight path be moved back to Virginia as a basic overlay of the original Historic National 328 flight path. See, Final DCA Airplane Noise Assessment dated September 2018. Rather than considering that currently pending Administrative Petition, together with its supporting expert study, as one potential solution to the P-56 problem, the FAA has studiously ignored D.C.’s Petition as though it does not exist.

Moreover, in order for the FAA to adopt any such “policy,” of keeping departing aircraft “over the Potomac River” – which is strenuously contested by the District of Columbia – the FAA would have to conduct a rulemaking pursuant to the Federal Rules of Administrative Procedure. The FAA cannot adopt any such policy by fiat simply by stating it in a notice, as it attempts to do here.

As shown in my initial comments, the FAA’s assumption, that it can move its unlawful RNAV LAZIR flightpath only part of the way back to its historic 79-year old flight track is without basis. A federal agency simply cannot arrive at an informed decision without asking for, receiving, and considering input from all potentially affected parties. For that reason alone, the FAA must now conduct an Environmental Assessment that will give all local and governmental entities the opportunity to present their views and any evidence to support those views. Because the FAA has unilaterally extended the time for implementing the proposed change to December 31, 2020, there is no reason to believe that a proper EA could not be expeditiously conducted by that time.

Respectfully submitted,

Don W. Crockett

ATTACHMENT D: Noise Screening Results

Noise Screening Analysis Report

For

Ronald Reagan Washington National Airport

KDCA

Washington, DC

Prepared by:

ATO, AJV-114, Environmental Policy Team

Tuesday, April 07, 2020

DCA Noise Screening Analysis Report *For Official Internal Use Only*

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Summary

Noise analysis was completed to assess potential impacts resulting from proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC, using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Historical radar track data was used to create a baseline scenario. After the baseline scenario was built, aircraft operations assigned to the proposed procedure were modeled as flying the proposed procedure, which provides the alternative scenario. Selections for track assignments were made based on historical flight paths, and RNAV capable aircraft were assigned to the procedure nearest to their historical tracks in the alternative scenario.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. In the case of DCA, there was no significant or reportable increase in noise resulting from the proposed action.

Purpose

The purpose of this report is to document the process used to analyze the noise impact of proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC and to present the results of that analysis. The analysis of the instrument flight procedures at DCA was performed using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Figure 1 shows the airport diagram for DCA, which provides the runway layout and the airport's field elevation. Table 1 shows the procedure name, type and publication date. Figures depicting the procedure changes are shown in Appendix A.

Table 1: Proposed Procedures Modeled for DCA

Procedure Name	Procedure Type
AMEEE ONE	RNAV SID
CLTCH TWO	RNAV SID
DOCTR FIVE	RNAV SID
HORTO THREE	RNAV SID
JDUBB TWO	RNAV SID
REBLL FOUR	RNAV SID
SCRAM FOUR	RNAV SID
SOOKI FIVE	RNAV SID
WYNGS FOUR	RNAV SID

Methods

Noise screening was completed using the TARGETS Environmental Plug-in tool to calculate Day-Night Average Sound Levels (DNL) from existing operations (baseline) and modeled operations to replicate the proposed action (alternative). Historical radar track data for DCA was obtained from the Performance Data Analysis and Reporting System (PDARS). After concurrence of the dates to be used by the environmental specialist and air traffic facility, 60 days of random radar track data were selected for the DCA analysis representing a range of temperature and wind conditions as well as being representative of the average runway usage. A list of the tracks selected for analysis are shown in Appendix B.

After the removal of overflights, incomplete track segments, and other unusable tracks, 24,743 tracks were used for the analysis. The altitude of the historical tracks was considered and a range ring was set to contain the area where most of the tracks reached above 10,000 feet Above Field Elevation (AFE). This established the study area and the tracks outside of the study area were removed from the analysis. In the case of DCA, the study area is a circle with a radius of 40 nautical miles (nm) centered over the airport.

The randomly selected dates are presumed to represent average traffic counts and traffic flows through various seasons and peak travel times for DCA. There were no significant runway outages or significant conditions that would otherwise result in abnormal traffic counts or traffic flows. In order to calculate the Average Annual Day (AAD) impacts, traffic counts for average daily departures and arrivals used for annualization in this analysis were obtained through the FAA's AFS Data Analytics Runway Usage Module.

Historical radar track data was used to create a baseline noise exposure, which provides lateral path definition, aircraft fleet mix, departure/arrival stream proportions for each runway, and day/night traffic ratios. The alternative scenario was built by taking aircraft operations and assigning them to the proposed procedure instead of their historical tracks. RNAV capable aircraft were assigned to the procedure based on their historical tracks, proximity to other procedures, and any additional usage information from the Environmental Specialist. In the case of DCA, all operations departing from runways 01 and 03 were assigned to a proposed procedure.

The analysis does not take into account terrain. All calculations were made in reference to the airport's field elevation. The altitude controls were based on AEDT standard aircraft profiles. With respect to lateral distribution, a 0.5 nm dispersion for RNAV procedures was used and a 0.3 nm dispersion for RNP procedures was used based standard methods for noise screening. For tracks near the runway where dispersion is normally less than 0.3 nm, dispersion was based on historical track data.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. The Environmental Plug-in Tool uses the Aviation Environmental Design Tool to calculate noise. The noise output files from AEDT for both the baseline and alternative noise exposures consist of a series of equally spaced grid points, each showing the DNL value. The noise grid (receptor set) is a square grid extending 30 nm in each direction of the airport with grid points (receptors) spaced 0.25 nm apart. The noise results of the baseline and alternative scenarios were then compared to test for potential noise impacts.

The noise impact is a comparison between the baseline and the alternative noise exposure that depicts reportable and significant noise changes at all affected locations per the criteria indicated in FAA Order 1050.1F and Chapter 32 of FAA Order 7400.2K. The reportable and significant noise increases and decreases (if any) are then depicted on an aerial map.

Results

1. Noise Exposure

The baseline and alternative noise exposure is shown in Figure 3-1 and Figure 3-2, which depicts the levels and locations of the noise produced by the historical radar track data for arrivals and departures.

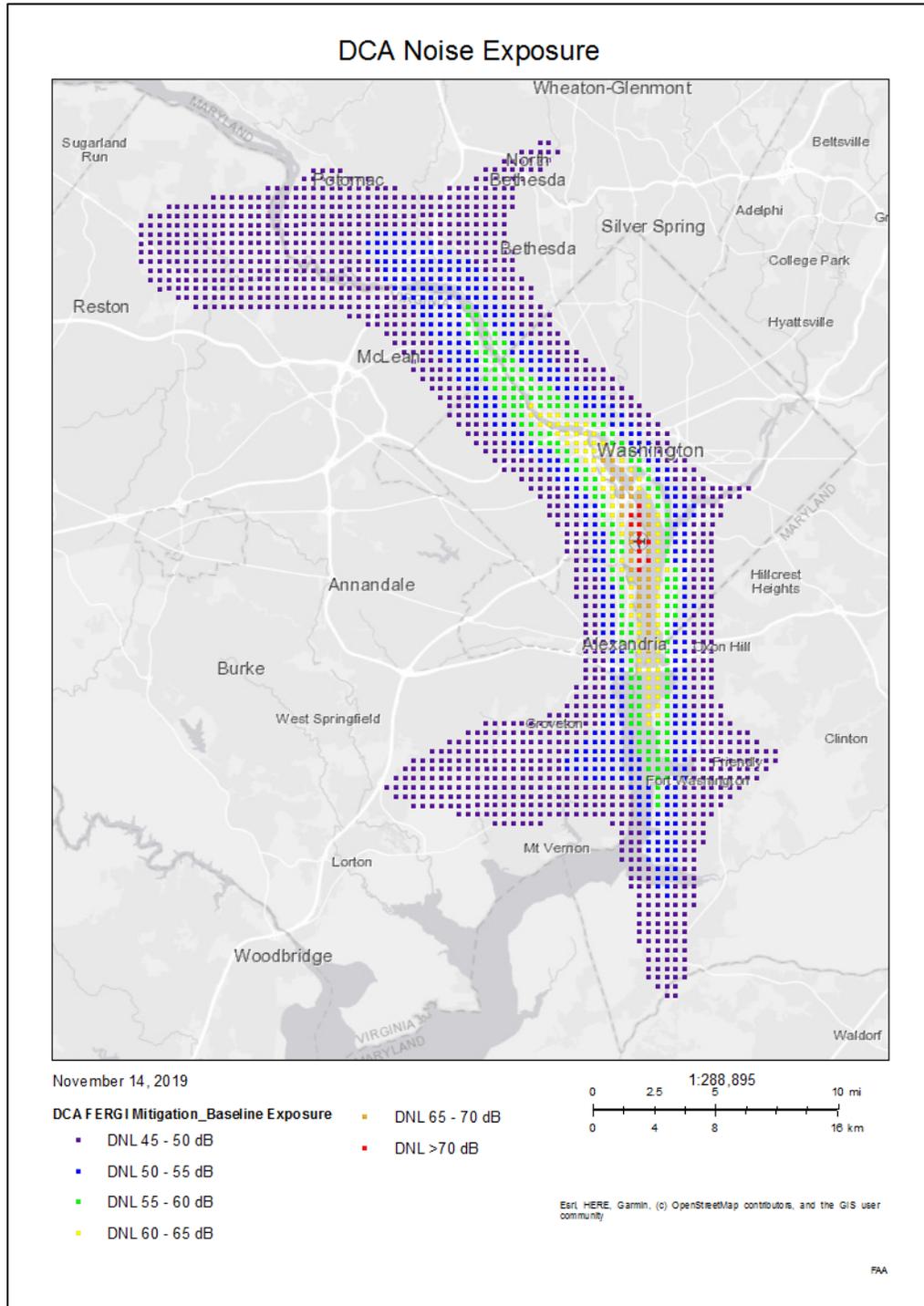


Figure 3-1: Baseline Noise Exposure in TARGETS

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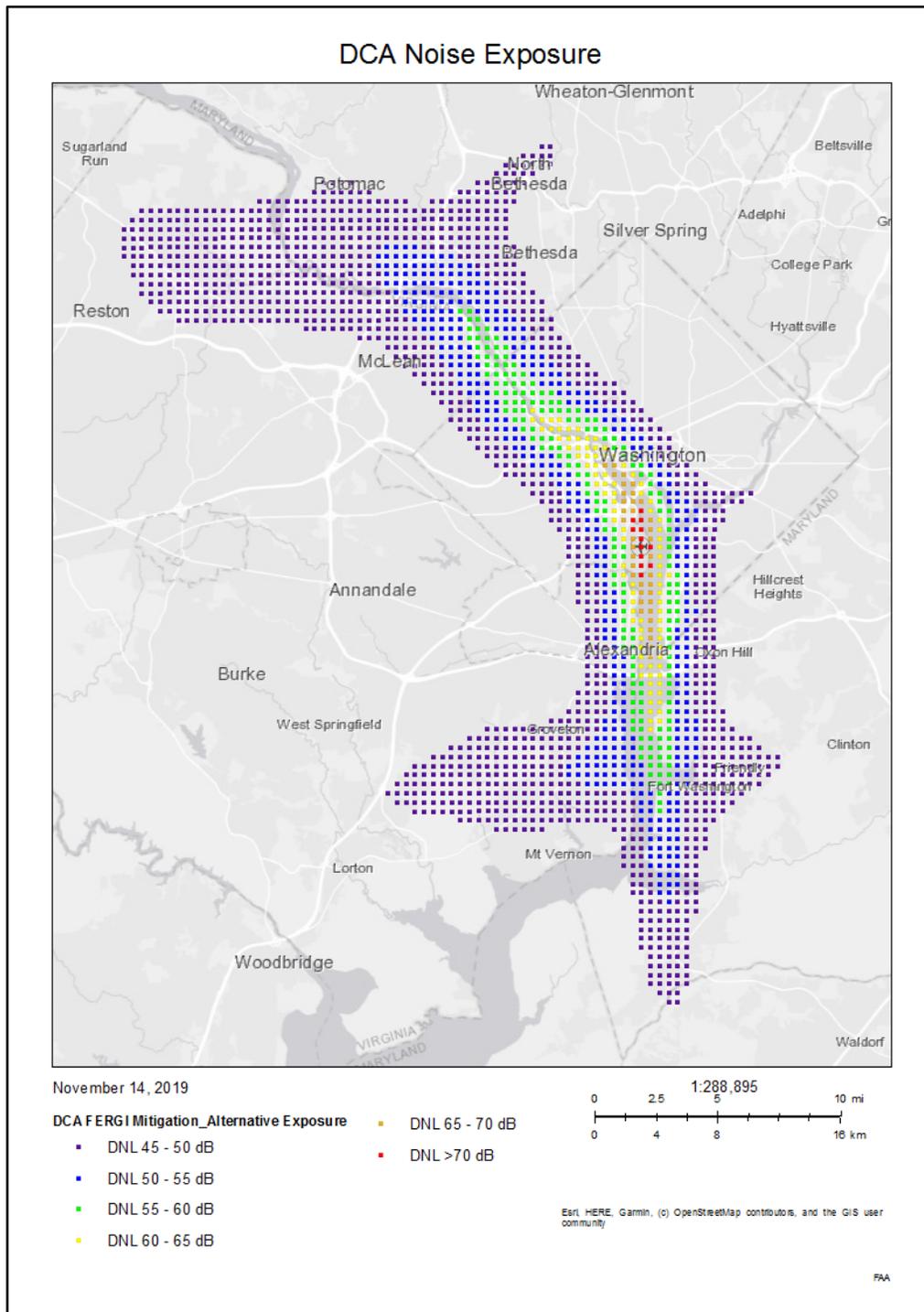


Figure 3-2: Alternative Noise Exposure for the Proposed Procedures in TARGETS

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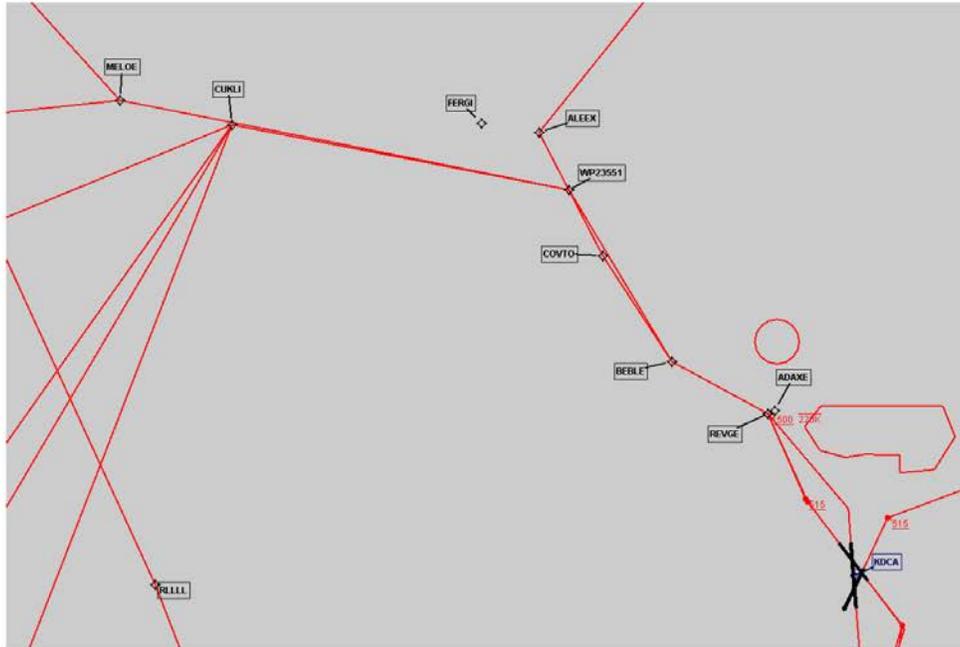
2. Noise Impacts

A comparison of the baseline and alternative scenarios by the TARGETS Environmental plug-in determines the noise impacts of the proposed action. Significance of noise impacts is defined by FAA Order 1050.1F¹ which establishes the threshold for significant increases in noise exposure. Where the proposed action results in a noise impact, TARGETS graphically displays a noise impact layer that indicates the locations of reportable and significant changes. When applicable, these impacts are shown overlaying a map view of the area surrounding the airport. In the case of DCA, there was **no significant increase in noise resulting from the proposed action.**

¹ According to Exhibit 4-1 of FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, a noise impact is significant if “*The action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.*”

Appendix A Proposed Changes to DCA SIDS

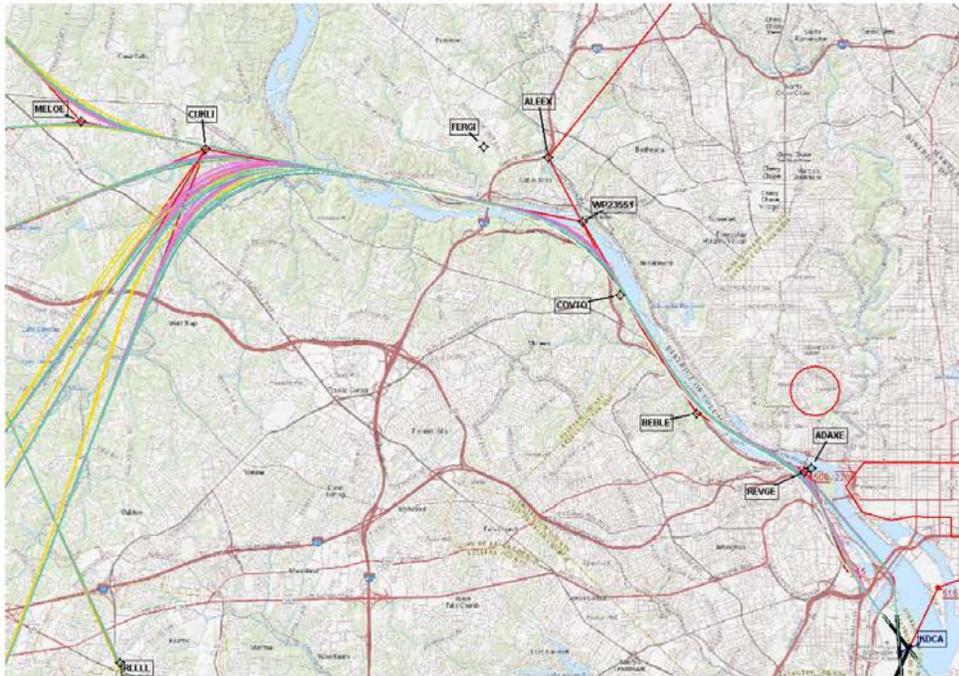
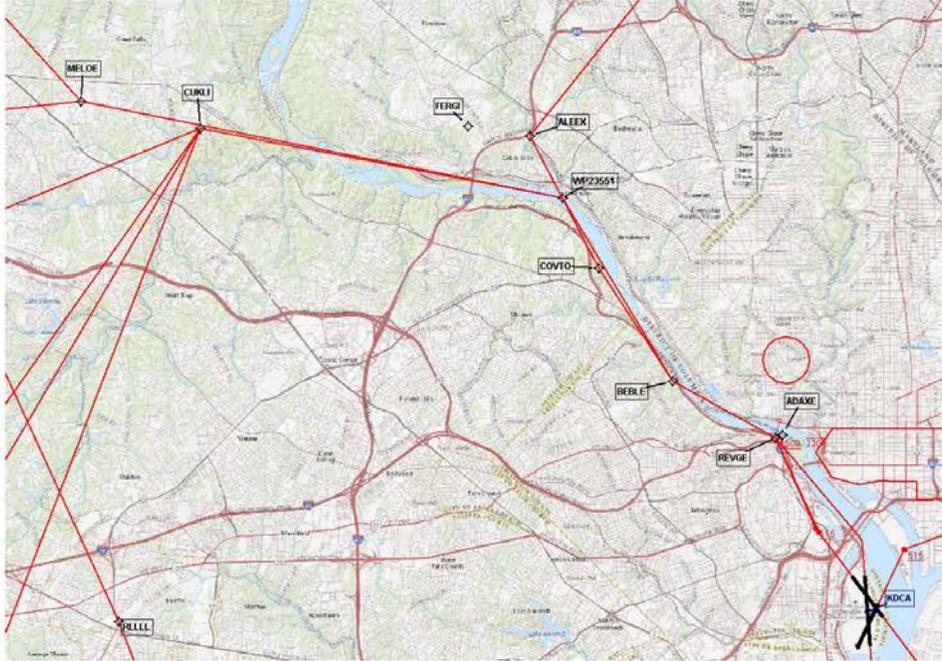
DCA SIDS - ALTERNATIVE ROUTE FROM BEBLE TO CUKLI/MELOE



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DCA SIDS - ALTERNATIVE ROUTE FROM BEBLE TO CUKLI/MELOE



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Appendix B Random Tracks Used for Analysis

1	7/9/2018
2	7/21/2018
3	7/23/2018
4	7/24/2018
5	7/26/2018
6	8/1/2018
7	8/5/2018
8	8/18/2018
9	8/20/2018
10	8/27/2018
11	8/29/2018
12	8/30/2018
13	9/1/2018
14	9/9/2018
15	9/11/2018
16	9/19/2018
17	10/8/2018
18	10/9/2018
19	10/14/2018
20	10/16/2018
21	10/17/2018
22	10/19/2018
23	10/21/2018
24	10/31/2018
25	11/7/2018
26	11/12/2018
27	12/1/2018
28	12/4/2018
29	12/7/2018
30	12/11/2018

31	12/12/2018
32	12/13/2018
33	12/18/2018
34	12/23/2018
35	12/27/2018
36	12/31/2018
37	1/3/2019
38	1/28/2019
39	1/30/2019
40	2/4/2019
41	2/5/2019
42	2/6/2019
43	2/8/2019
44	2/15/2019
45	2/18/2019
46	2/25/2019
47	3/9/2019
48	3/12/2019
49	3/20/2019
50	3/26/2019
51	3/27/2019
52	3/28/2019
53	4/25/2019
54	4/26/2019
55	4/27/2019
56	5/1/2019
57	5/3/2019
58	5/6/2019
59	5/23/2019
60	5/28/2019

ATTACHMENT E: Section 106 Agency Response Letters



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

February 25, 2020

Mr. David Maloney, SHPO
Historic Preservation Office
1100 4th Street, SW, Suite 650 East
Washington, DC 20024

Dear Mr. Maloney:

Subject: Federal Aviation Administration (FAA) Proposal to Publish Amended Air Traffic Procedures at Reagan National Airport – Amended waypoint of nine northbound Departure Procedures

The Federal Aviation Administration (FAA) is conducting an environmental review to consider the potential environmental impacts for the amendment of a waypoint used by nine departure procedures serving Ronald Reagan Washington National Airport (DCA) in Arlington County, Virginia (Proposed Action). The FAA has determined that the Proposed Action is an undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. § 470 et seq.) and its implementing regulations at 35 C.F.R. Part 800. This letter presents the FAA’s review of whether the project has an Area of Potential Effects and the FAA’s determination that no historic properties would be affected by the undertaking, pursuant to 36 C.F.R. 800.4(d)(1). Information supporting this finding, including a description of the undertaking and the FAA’s review of whether this project will affect historic properties and other information required by 36 C.F.R. 800.11(d) is contained within this correspondence.

The FAA respectfully requests your review of the information listed in this document and seeks your concurrence with our determination that the amended waypoint to departure procedures at DCA would not affect historic properties. As explained in greater detail below, the FAA has not designated an Area of Potential Effect (APE) because, as demonstrated by Figure 2, the Proposed Action is not expected to expand the flight corridor flown by current aircraft. As a result, the Proposed Action will not introduce any visual, atmospheric, or audible elements to new areas. In addition, the FAA’s noise screen for the Proposed Action, enclosed with this letter, concludes that the Proposed Action will not cause any reportable¹ or significant² noise impacts. Refer to **Attachment A** to review the Noise Screening Report.

¹ Under FAA policy, an increase in the Day-Night Average Sound Level (DNL) of 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, is significant. FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, Exhibit 4-1. DNL is the 24-hour average sound level, in decibels, for the period from midnight to midnight, obtained after the addition of ten decibels to sound levels for the periods between midnight and 7 a.m., and between 10 p.m., and midnight, local time.

² Under FAA policy, noise increases are “reportable” if the DNL increases by 5 dB or more within areas exposed to DNL 45-60 dB, or by 3 dB or more within areas exposed to DNL 60-65 dB. FAA Order 1050.1F, Appendix B, section B-1.4.

Project Description

On January 30, 2020, the FAA began conducting a temporary air traffic test to move a waypoint, ADAXE, 784 feet to the southwest, and rename that waypoint REVGE as part of the publication of a new departure procedure called HOLT B. **Note: Departure procedures such as HOLT B are a series of waypoints that aircraft fly by in order to route aircraft in a safe and efficient manner.** The temporary procedure has been used by approximately ten percent of north-flow departures at DCA since its implementation, which allows the FAA to compare the impact of using waypoint ADAXE to waypoint REVGE.

The purpose of the temporary HOLT B procedure and the FAA's Proposed Action is to enhance national security. The Proposed Action was developed because of a longstanding concern from the United States Secret Service caused by airlines penetrating the Prohibited Area P-56, which protects a portion of the National Mall in Washington, D.C. and the White House. Since 2012, over 300 incursions have occurred, which resulted in the U.S. Secret Service requesting that the FAA Administrator identify and implement changes for aircraft operating out of DCA to reduce aircraft violations of the Prohibited Area P-56. **Attachment B** contains a copy of the letter from the U.S. Secret Service to the FAA. In consultation with the Secret Service, the FAA identified amending the REVGE waypoint as a way to move aircraft away from P-56 while still flying over the Potomac River, which is consistent with longstanding community requests to manage aircraft noise from DCA. The FAA's Aviation Environmental Screening Tool (AEDT) was used to conduct noise screening to evaluate whether there would be noise impacts as a result of implementing the amended waypoint for all north-flow departure procedures at DCA. The results of the modeling, contained in Attachment A, indicated that there would be no reportable or significant noise impacts.

As noted above, the FAA published the temporary HOLT B procedure on January 30, 2020, to temporarily evaluate the effectiveness of the REVGE amendment and to ensure pilots and their planes could fly the procedure as designed by the FAA. **Figure 1** contains a depiction of the proposed amended procedure. Based on the initial results of the HOLT B, which indicates the amended waypoint meets the purpose and need of reducing incursions into P-56, the FAA is proposing to permanently implement the HOLT B as well as amend the remaining existing north-flow departure procedures at DCA so that all aircraft follow the new REVGE waypoint. Indeed, Figure 2 demonstrates that the use of the REVGE waypoint moves aircraft away from P-56 while still keeping them within the current corridor of flight tracks from aircraft using the ADAXE waypoint. As a result, the FAA is not introducing aircraft into any new areas, and aircraft will continue to fly over the Potomac River. As part of the FAA's environmental review for the Proposed Action, the FAA is engaging with your office pursuant to Section 106 of the National Historic Preservation Act.

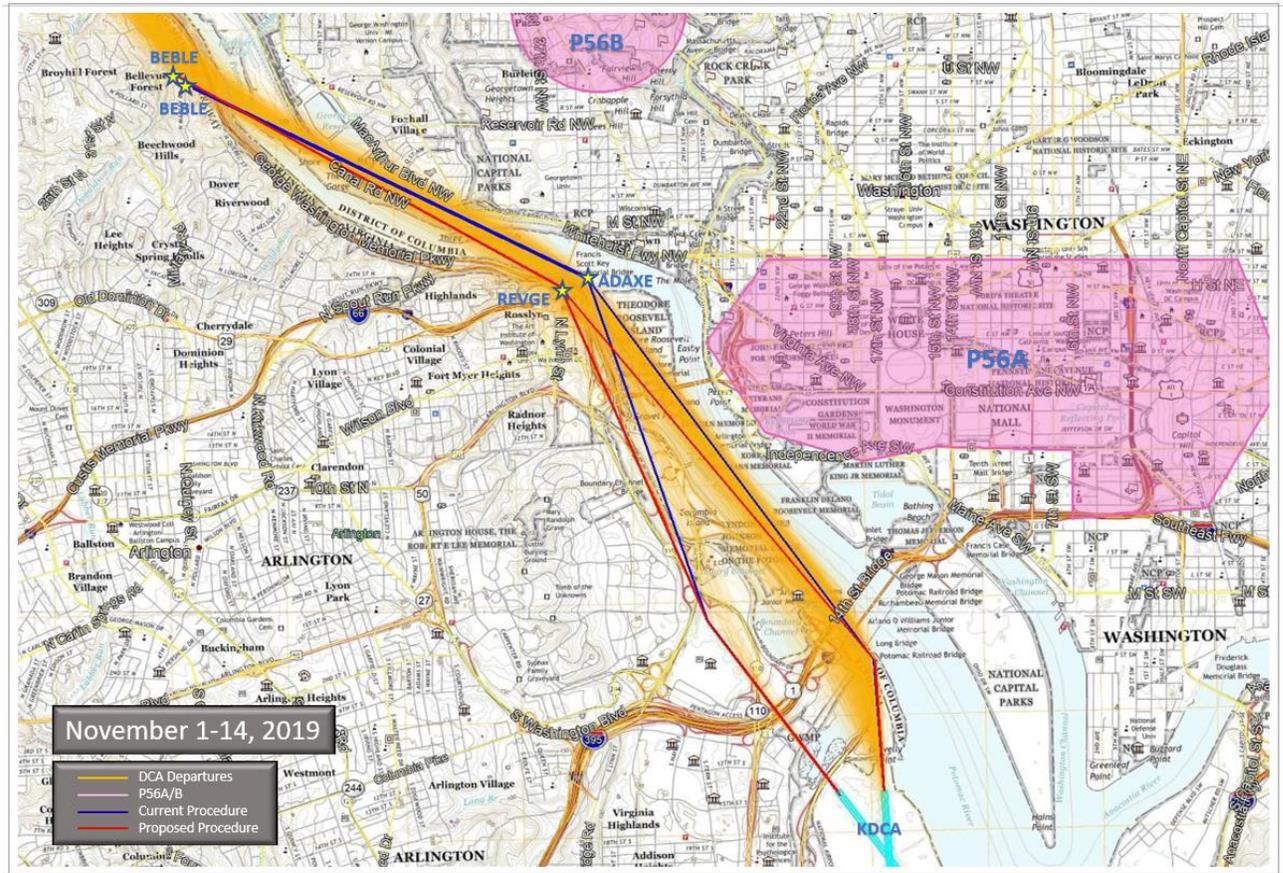


Figure 1. Original and proposed amended procedure, original procedure (blue lines) and proposed procedure (red lines). The orange shading represents radar tracks depicting aircraft location from November 1-14, 2019.

Area of Potential Effects

As part of its responsibilities under Section 106, the FAA attempted to identify the Area of Potential Effects for the undertaking. The Section 106 regulations define the APE as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” 36 CFR § 800.16(d).

The Proposed Action will not cause any physical effects. However, pursuant to 36 CFR 800.5(a)(2)(v), the FAA also considered the potential for the undertaking to introduce visual, atmospheric, or audible elements that could diminish the integrity of a historic property's significant historic features. The FAA compared the flight tracks of aircraft flying the REVGE waypoint to those still using the ADAXE waypoint. The comparison is depicted in Figure 2. Based on this comparison, the FAA determined that there would be no new areas overflowed by the Proposed Action, and therefore no potential to introduce new visual, atmospheric or audible elements.

The FAA also considered the potential for the undertaking to have noise effects that could alter the character or use of historic properties. The FAA conducted a noise screen to determine how this undertaking would affect current aircraft noise exposure levels. This analysis indicated that the undertaking would not result in any noise increase that would be “significant” or “reportable” as defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.

In sum, after careful evaluation of aircraft radar tracks for the proposed action compared to the no action alternative, the FAA determined that the outer boundaries of the flight corridor did not expand when aircraft used the new REVGE waypoint. Refer to **Figure 2** to view the comparison of radar flight tracks from February 6-11, 2020. Additionally, the FAA's noise screening tool AEDT did not indicate any measurable change in noise level (no reportable or significant noise increase). Refer to **Attachment A** to review the AEDT noise screening analysis report. Based on the FAA's determination that this undertaking does not have an Area of Potential Effects, the FAA is proposing a finding of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

KDCA All Departures – Feb 6 – Feb11, 2020 – 2356 Tracks

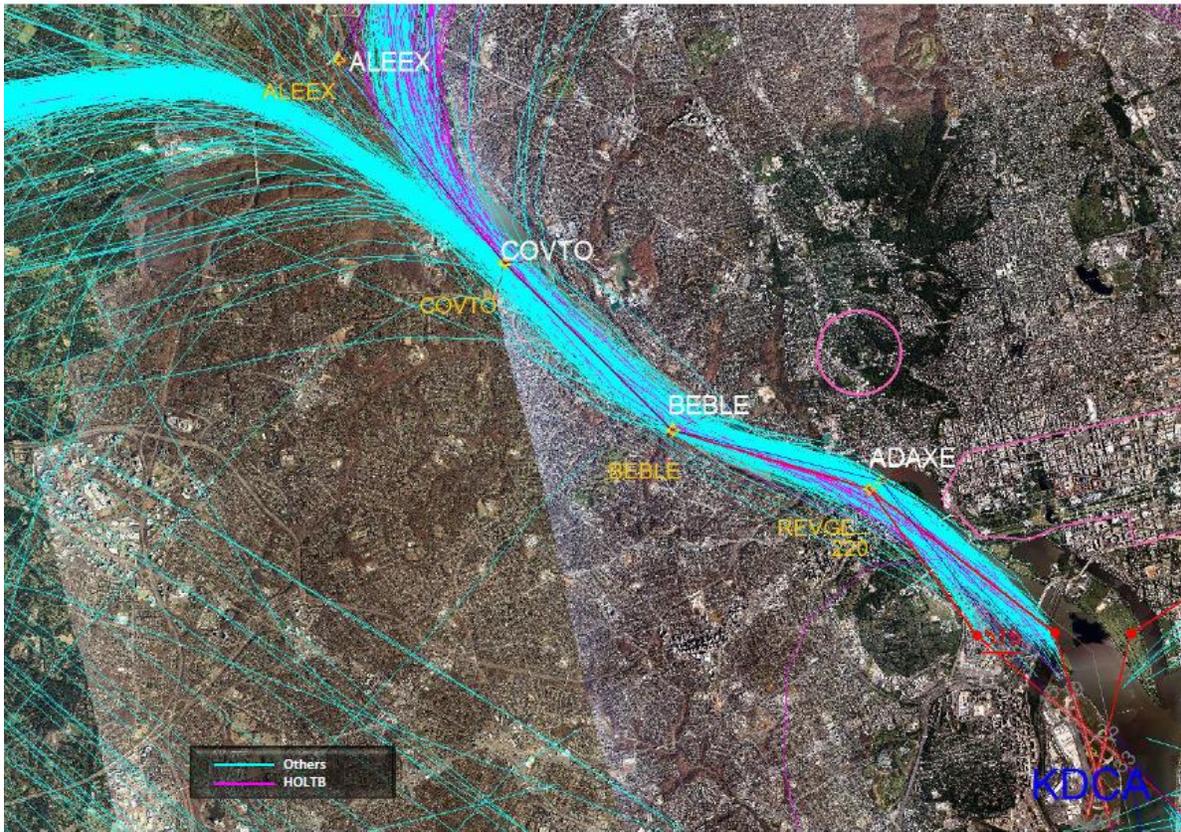


Figure 2. No action alternative flight radar tracks (light blue) versus the proposed action flight radar tracks (magenta) for the period February 6 - February 11, 2020.

Request for Concurrence

The FAA requests your review of the information listed within this document, and we seek your concurrence with the FAA's finding pursuant to 36 CFR 800.4(d)(1) that no historic properties would be affected by the amended waypoint to north-flow departure procedures at DCA. As set forth in 36 CFR 800.4(d)(1)(i), any objections must be filed within 30 days receipt of the FAA's finding. If you desire to provide comments or objections, please provide them by letter or email within 30 days to the undersigned at the following address:

Andy Pieroni, Environmental Protection Specialist
Eastern Service Center - Operations Support Group, AJV-E250
1701 Columbia Avenue
College Park, GA 30337
(404) 305-5586 (tel)
(404)-305-5572 (fax)
E-mail address for questions: andrew.pieroni@faa.gov

The FAA would like to thank you for your interest in this project. If you have any questions about the information provided, please feel free to contact me at 404-305-5571.

Sincerely,



For
Ryan Almasy
Manager, Operations Support Group, AJV-E200
Eastern Service Center
Federal Aviation Administration

ATTACHMENTS

Attachment A: Noise Screening Report

Noise Screening Analysis Report

For

Ronald Reagan Washington National Airport

KDCA

Washington, DC

Prepared by:

ATO, AJV-114, Environmental Policy Team

Friday, February 21, 2020

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Purpose

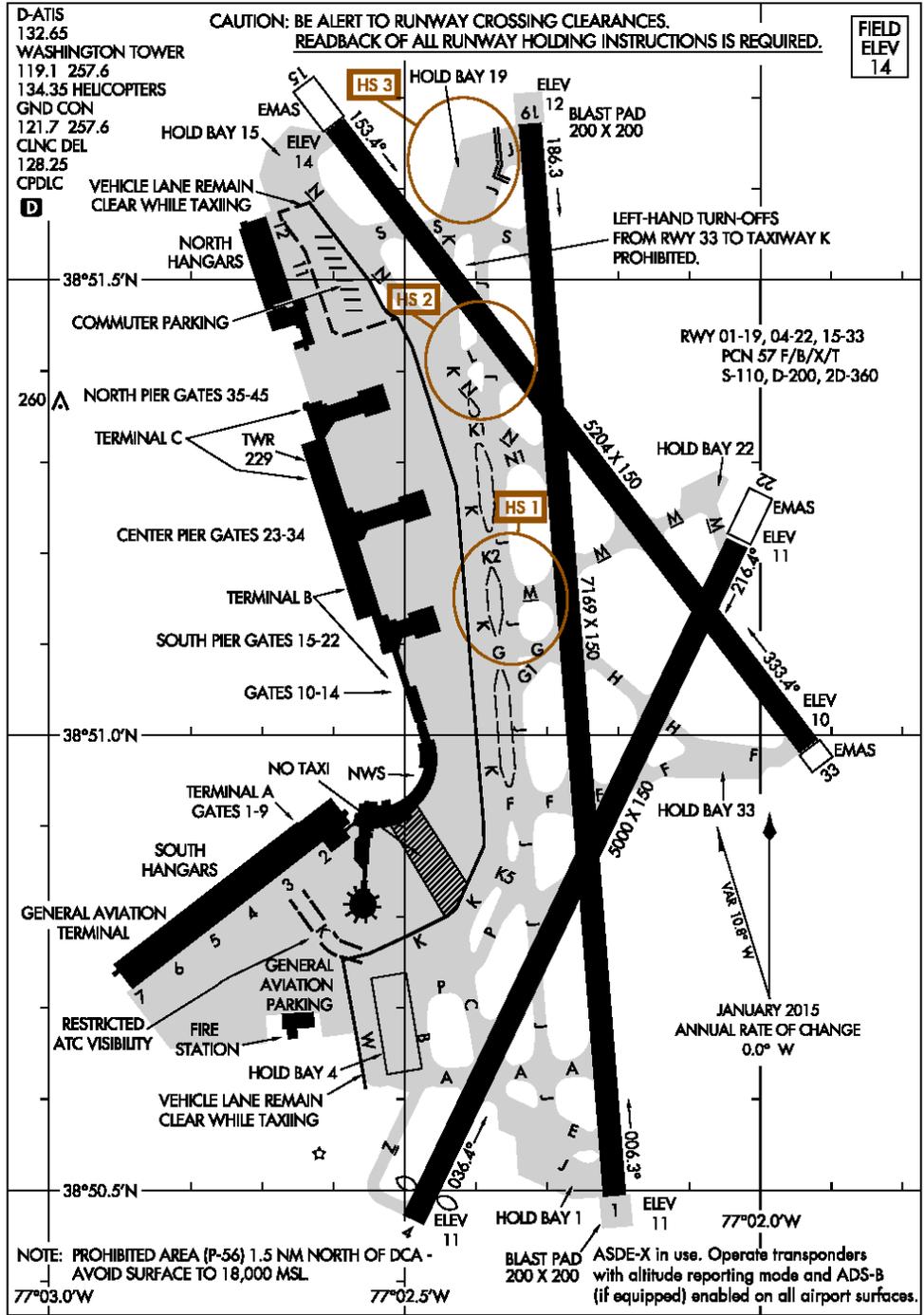
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Figure 1 shows the airport diagram for DCA, which provides the runway layout and the airport's field elevation. Table 1 shows the procedure name, type and publication date.

Table 1: Proposed Procedures Modeled for DCA

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REBLL FOUR	RNAV SID
SCRAM FOUR	RNAV SID
SOOKI FIVE	RNAV SID
WYNGS FOUR	RNAV SID

19283 **AIRPORT DIAGRAM** RONALD REAGAN WASHINGTON NATIONAL (DCA)
 AL-443 (FAA) WASHINGTON, D.C.



AIRPORT DIAGRAM WASHINGTON, D.C.
 19283 RONALD REAGAN WASHINGTON NATIONAL (DCA)

Figure 1: Airport Diagram of DCA

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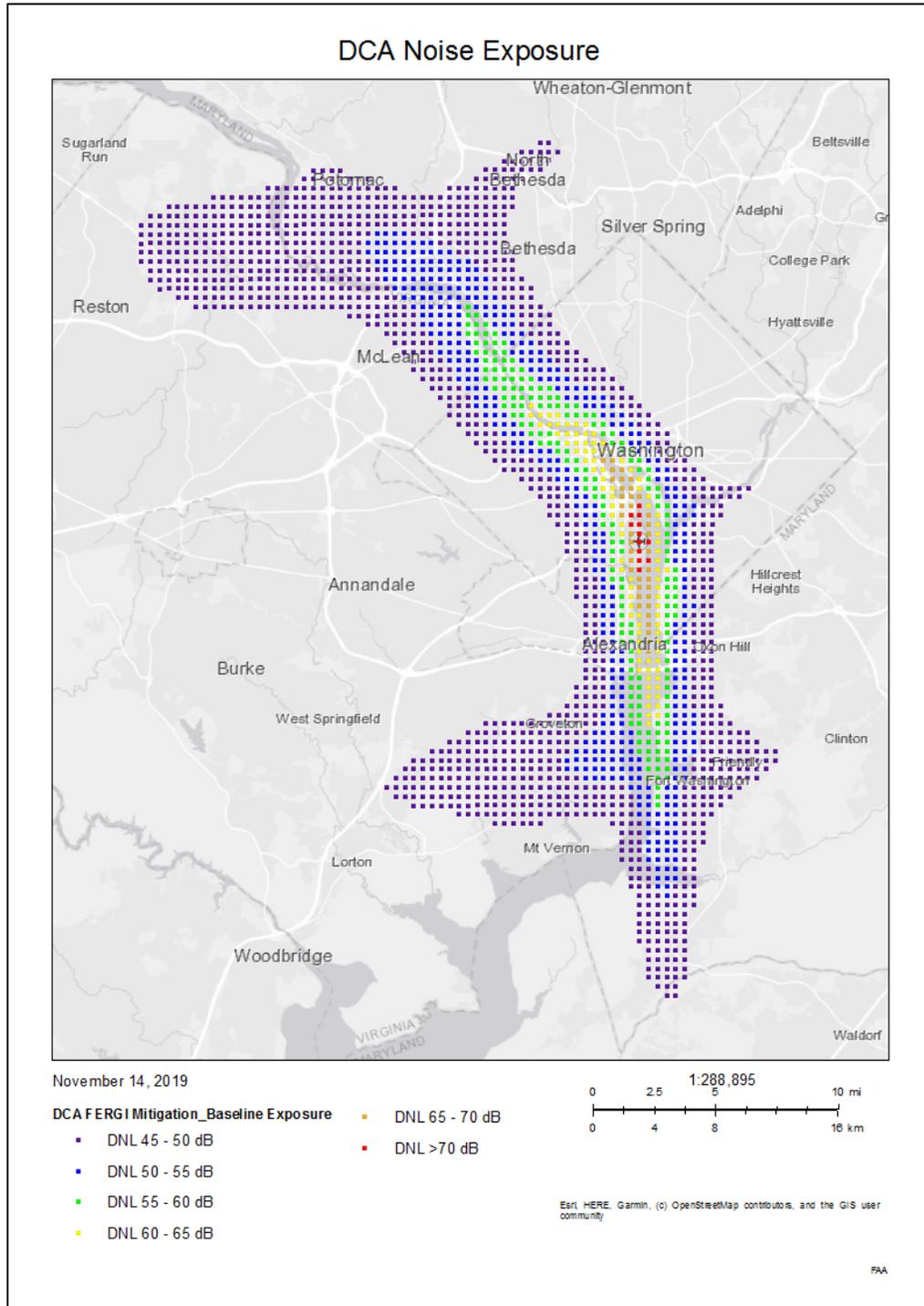


Figure 3-1: Baseline Noise Exposure in TARGETS

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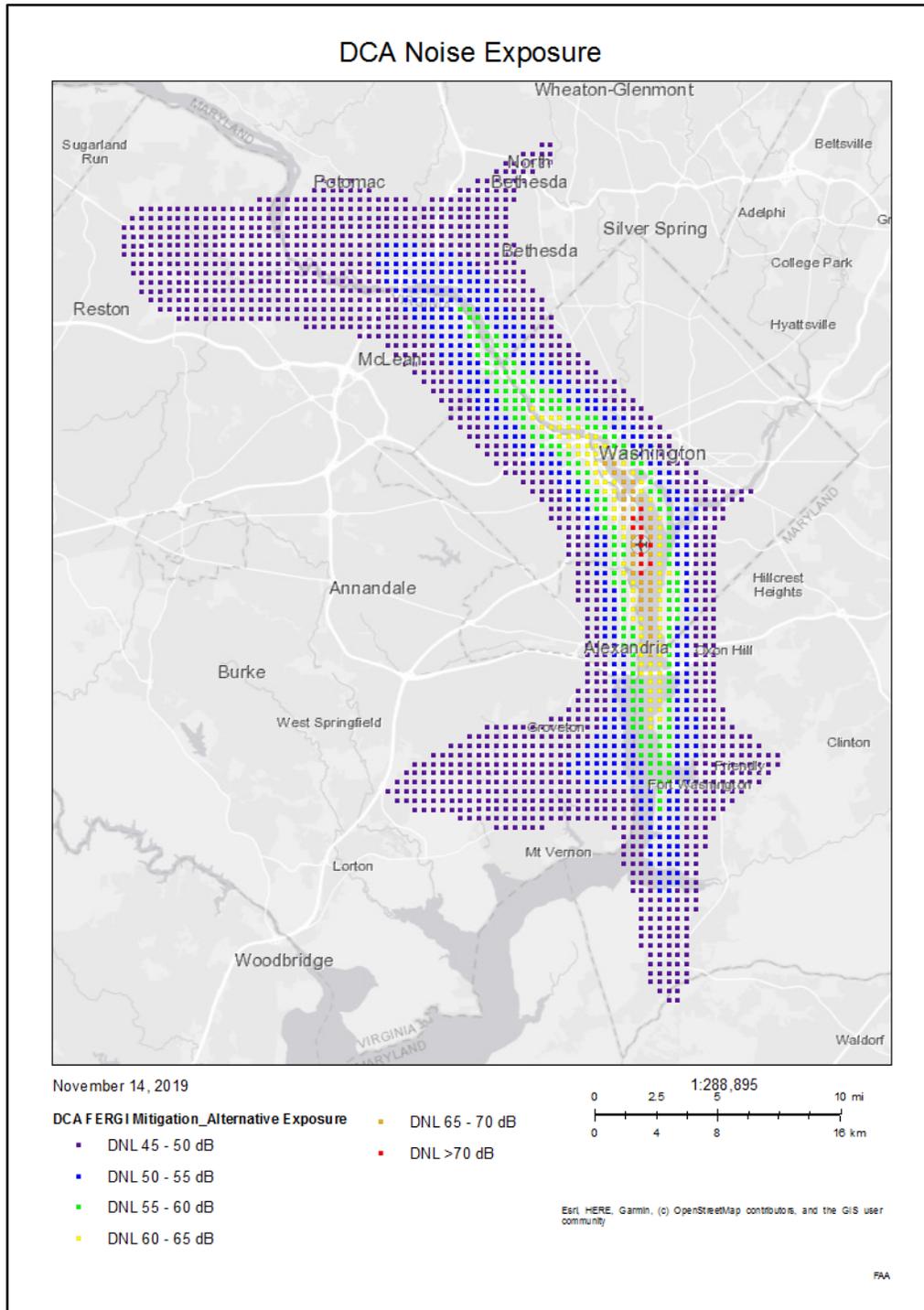


Figure 3-2: Alternative Noise Exposure for the Proposed Procedures in TARGETS

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2. Noise Impacts

A comparison of the baseline and alternative scenarios by the TARGETS Environmental plug-in determines the noise impacts of the proposed action. Significance of noise impacts is defined by FAA Order 1050.1F¹ which establishes the threshold for significant increases in noise exposure. Where the proposed action results in a noise impact, TARGETS graphically displays a noise impact layer that indicates the locations of reportable and significant changes. When applicable, these impacts are shown overlaying a map view of the area surrounding the airport. In the case of DCA, there was **no reportable or significant increase in noise resulting from the proposed action.**

¹ According to Exhibit 4-1 of FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, a noise impact is significant if “*The action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.*”

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Appendix A Random Tracks Used for Analysis

1	7/9/2018
2	7/21/2018
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48	3/12/2019
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60	5/28/2019

Attachment B: Letter from US Secret Service to the FAA Requesting New Flight ProceduresU.S. Department of Homeland Security
UNITED STATES SECRET SERVICE

Washington, D.C. 20223

August 15, 2018

Mr. Daniel K. Elwell
Acting Administrator
U.S. Department of Transportation
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Dear Mr. Elwell:

I am writing you to discuss flight incursions into the Prohibited Area P-56, District of Columbia. The proximity of Ronald Reagan Washington National Airport (KDCA) to the White House and Naval Observatory, creates a significant security risk for the U.S. Secret Service (Secret Service). Pursuant to Title 18, Section 3056, of the United States Code, the Secret Service is responsible for implementing appropriate security procedures for the President, Vice President, and visiting heads of state. In accordance with these responsibilities, the Secret Service must ensure the security of the airspace above the White House and the Naval Observatory, both of which fall within the Prohibited Area P-56. Over the past few years the Secret Service has observed an increase in flight violations into the Prohibited Area P-56 from aircraft departing and arriving KDCA, resulting in an annual incursion increase of approximately thirty percent. The increased numbers of aircraft violating the Prohibited Area P-56 has caused great concern for the Secret Service.

Pursuant to 14 CFR Part 73 [Airspace Docket No. 98-AWA-4] Change of Using Agency for Prohibited Area P-56, from the Administrator of the Federal Aviation Administration to the Secret Service, I would respectfully request that the Federal Aviation Administration identify and implement new procedures for aircraft operating out of KDCA. The objective of the Secret Service, regarding this request, is to reduce and ultimately eliminate aircraft violations of the Prohibited Area P-56. Each incursion provokes a significant coordinated response from the Department of Defense and numerous federal agencies, including the Secret Service, causing the expenditure of valuable resources while also affecting commercial and other air traffic in the National Capital Region. Additionally, this request will reduce the exposure to potential liability which commercial airlines, air charter companies, and individual pilots face for each incursion.

Thank you for any assistance you can provide with this request. Should you wish to discuss this matter further, please do not hesitate to contact Deputy Assistant Director, Special Operations, James Lewis on 202-406-5452.

Sincerely,

A handwritten signature in blue ink that reads "R.D. Alles".

Randolph D. "Tex" Alles



March 20, 2020

Mr. Andy Pieroni, Environmental Protection Specialist
Eastern Service Center, Operations Support Group
U.S. Department of Transportation
Federal Aviation Administration
1701 Columbia Avenue
College Park, GA 30337

RE: Section 106 Review: Amended FAA Air Traffic Procedures at National Airport – Amended
Waypoint of Nine Departure Procedures (HOLTB; ADAXE to REVGE)

Dear Mr. Pieroni:

Thank you for consulting with the District of Columbia State Historic Preservation Officer (DC SHPO) regarding the above-referenced undertaking. We received your letter on March 3, 2020 and are writing to provide comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

We understand that the Federal Aviation Administration (FAA) proposes to permanently relocate one of the “waypoints” that aircraft fly by to ensure safe and efficient operations. The air traffic control procedure associated with this proposed change is referred to as HOLTB. The current waypoint, referred to as ADAXE, is located above the Potomac River northwest of Theodore Roosevelt Island and southeast of the Key Bridge. The proposed waypoint, referred to as REVGE, is located 784 feet to the southwest, roughly above the southern end of the Key Bridge (refer to attached graphics).

The reason for the proposed relocation is to enhance national security by directing air traffic away from the prohibited airspace (P-56) above the National Mall and White House. The U.S. Secret Service requested FAA to make this change due to a growing number of incursions by air traffic into the prohibited zone.

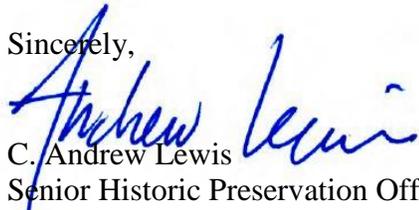
FAA has requested DC SHPO to comment on whether the undertaking has an Area of Potential Effect (APE). FAA has not designated an APE because relocation “...is not expected to expand the flight corridor flown by current aircraft” and because it “...will not introduce any visual, atmospheric, or audible elements into new areas.” These circumstances do not negate the need to define the APE as required by 36 CFR 800.4(a). Although the proposed 784 feet shift may be relatively minor, it is our understanding that aircraft will be flying further to the west to avoid prohibited airspace. This suggests that there is some potential to cause alterations in the character or use of historic properties, albeit subtle. Regardless, the APE should consist of the areas where air traffic noise (i.e. audible effects) is detectable – even if that area is no different from current conditions.

FAA has also requested DC SHPO to comment on its finding that no historic properties would be affected by the proposed relocation. This determination is based upon an on-going test of a temporarily relocated waypoint and a resulting study that found no “significant” or “reportable” noise increases as defined by applicable FAA policy.

We see no reason to question the results of the study, but we do not concur that no historic properties will be affected by the relocation. The undertaking will direct air traffic to fly over, or near historic properties (e.g. the Georgetown Historic District) in a slightly modified path that will cause perceptible audible effects. However, when compared to existing conditions, and with regard to the currently proposed undertaking only, it appears that historic properties within the District of Columbia may be exposed to slightly decreased noise levels resulting from a marginal shift away from their location. For this reason, we believe that FAA’s proposal to shift ADAXE 784 feet southwest to REVGE will have “no adverse effect” on the historic properties under our purview. As required by 36 CFR Part 800, FAA should continue to consult with consulting parties and consider their views in making a final determination of effect.

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this opportunity to review and comment.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Officer
DC State Historic Preservation Office

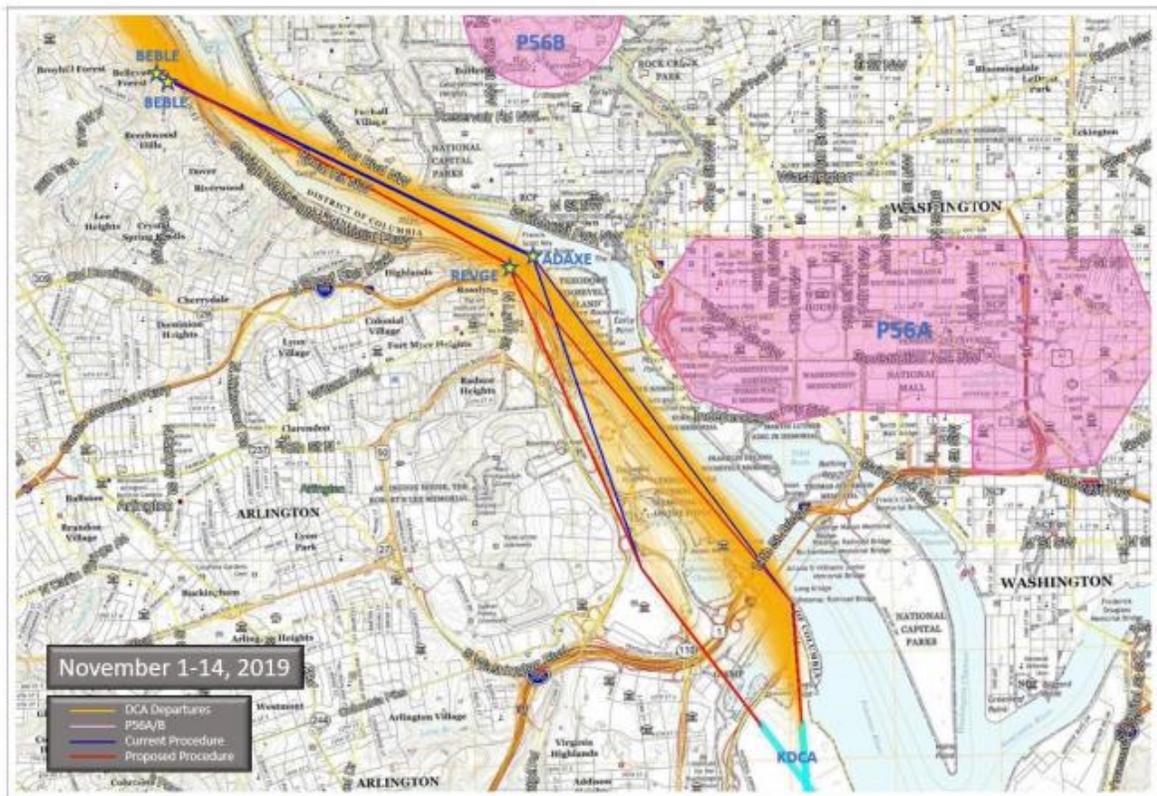
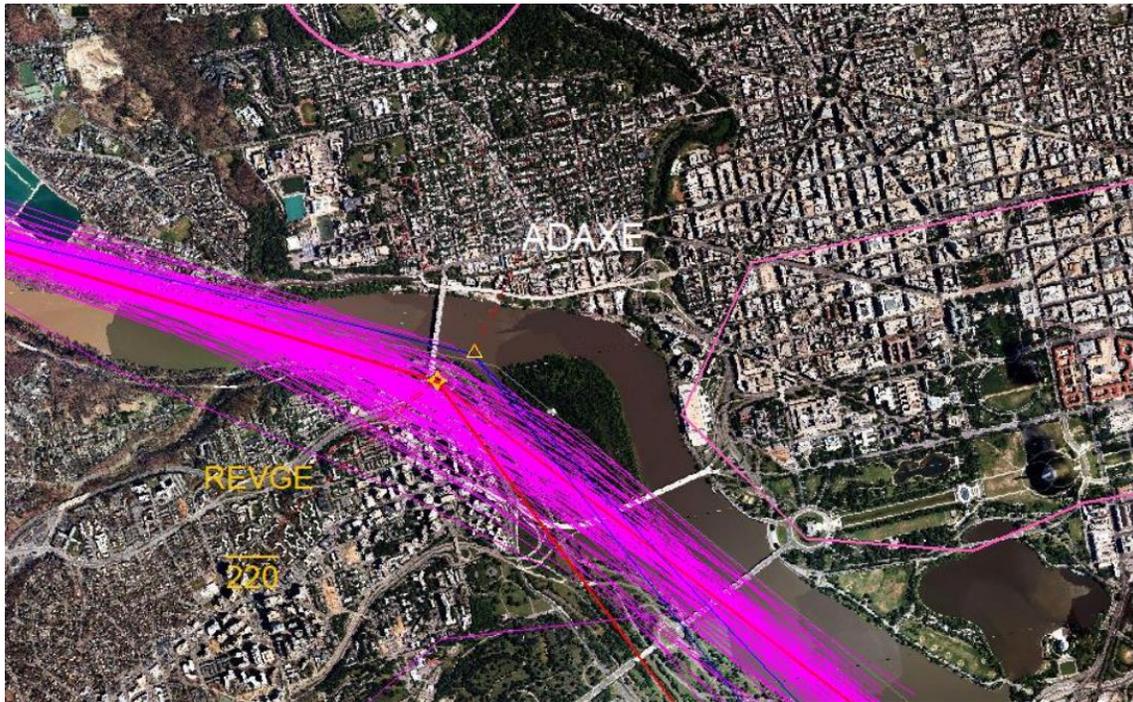


Figure 1. Original and proposed amended procedure, original procedure (blue lines) and proposed procedure (red lines). The orange shading represents radar tracks depicting aircraft location from November 1-14, 2019.



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

February 25, 2020

Ms. Amanda Apple, Preservation Officer
MHT, Project Review and Compliance
100 Community Place
Crownsville, MD 21032

Dear Ms. Apple:

Subject: Federal Aviation Administration (FAA) Proposal to Publish Amended Air Traffic Procedures at Reagan National Airport – Amended waypoint of nine northbound Departure Procedures

The Federal Aviation Administration (FAA) is conducting an environmental review to consider the potential environmental impacts for the amendment of a waypoint used by nine departure procedures serving Ronald Reagan Washington National Airport (DCA) in Arlington County, Virginia (Proposed Action). The FAA has determined that the Proposed Action is an undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. § 470 et seq.) and its implementing regulations at 35 C.F.R. Part 800. This letter presents the FAA’s review of whether the project has an Area of Potential Effects and the FAA’s determination that no historic properties would be affected by the undertaking, pursuant to 36 C.F.R. 800.4(d)(1). Information supporting this finding, including a description of the undertaking and the FAA’s review of whether this project will affect historic properties and other information required by 36 C.F.R. 800.11(d) is contained within this correspondence.

The FAA respectfully requests your review of the information listed in this document and seeks your concurrence with our determination that the amended waypoint to departure procedures at DCA would not affect historic properties. As explained in greater detail below, the FAA has not designated an Area of Potential Effect (APE) because, as demonstrated by Figure 2, the Proposed Action is not expected to expand the flight corridor flown by current aircraft. As a result, the Proposed Action will not introduce any visual, atmospheric, or audible elements to new areas. In addition, the FAA’s noise screen for the Proposed Action, enclosed with this letter, concludes that the Proposed Action will not cause any reportable¹ or significant² noise impacts. Refer to **Attachment A** to review the Noise Screening Report.

¹ Under FAA policy, an increase in the Day-Night Average Sound Level (DNL) of 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, is significant. FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, Exhibit 4-1. DNL is the 24-hour average sound level, in decibels, for the period from midnight to midnight, obtained after the addition of ten decibels to sound levels for the periods between midnight and 7 a.m., and between 10 p.m., and midnight, local time.

² Under FAA policy, noise increases are “reportable” if the DNL increases by 5 dB or more within areas exposed to DNL 45-60 dB, or by 3 dB or more within areas exposed to DNL 60-65 dB. FAA Order 1050.1F, Appendix B, section B-1.4.

Project Description

On January 30, 2020, the FAA began conducting a temporary air traffic test to move a waypoint, ADAXE, 784 feet to the southwest, and rename that waypoint REVGE as part of the publication of a new departure procedure called HOLT B. **Note: Departure procedures such as HOLT B are a series of waypoints that aircraft fly by in order to route aircraft in a safe and efficient manner.** The temporary procedure has been used by approximately ten percent of north-flow departures at DCA since its implementation, which allows the FAA to compare the impact of using waypoint ADAXE to waypoint REVGE.

The purpose of the temporary HOLT B procedure and the FAA's Proposed Action is to enhance national security. The Proposed Action was developed because of a longstanding concern from the United States Secret Service caused by airlines penetrating the Prohibited Area P-56, which protects a portion of the National Mall in Washington, D.C. and the White House. Since 2012, over 300 incursions have occurred, which resulted in the U.S. Secret Service requesting that the FAA Administrator identify and implement changes for aircraft operating out of DCA to reduce aircraft violations of the Prohibited Area P-56. **Attachment B** contains a copy of the letter from the U.S. Secret Service to the FAA. In consultation with the Secret Service, the FAA identified amending the REVGE waypoint as a way to move aircraft away from P-56 while still flying over the Potomac River, which is consistent with longstanding community requests to manage aircraft noise from DCA. The FAA's Aviation Environmental Screening Tool (AEDT) was used to conduct noise screening to evaluate whether there would be noise impacts as a result of implementing the amended waypoint for all north-flow departure procedures at DCA. The results of the modeling, contained in Attachment A, indicated that there would be no reportable or significant noise impacts.

As noted above, the FAA published the temporary HOLT B procedure on January 30, 2020, to temporarily evaluate the effectiveness of the REVGE amendment and to ensure pilots and their planes could fly the procedure as designed by the FAA. **Figure 1** contains a depiction of the proposed amended procedure. Based on the initial results of the HOLT B, which indicates the amended waypoint meets the purpose and need of reducing incursions into P-56, the FAA is proposing to permanently implement the HOLT B as well as amend the remaining existing north-flow departure procedures at DCA so that all aircraft follow the new REVGE waypoint. Indeed, Figure 2 demonstrates that the use of the REVGE waypoint moves aircraft away from P-56 while still keeping them within the current corridor of flight tracks from aircraft using the ADAXE waypoint. As a result, the FAA is not introducing aircraft into any new areas, and aircraft will continue to fly over the Potomac River. As part of the FAA's environmental review for the Proposed Action, the FAA is engaging with your office pursuant to Section 106 of the National Historic Preservation Act.

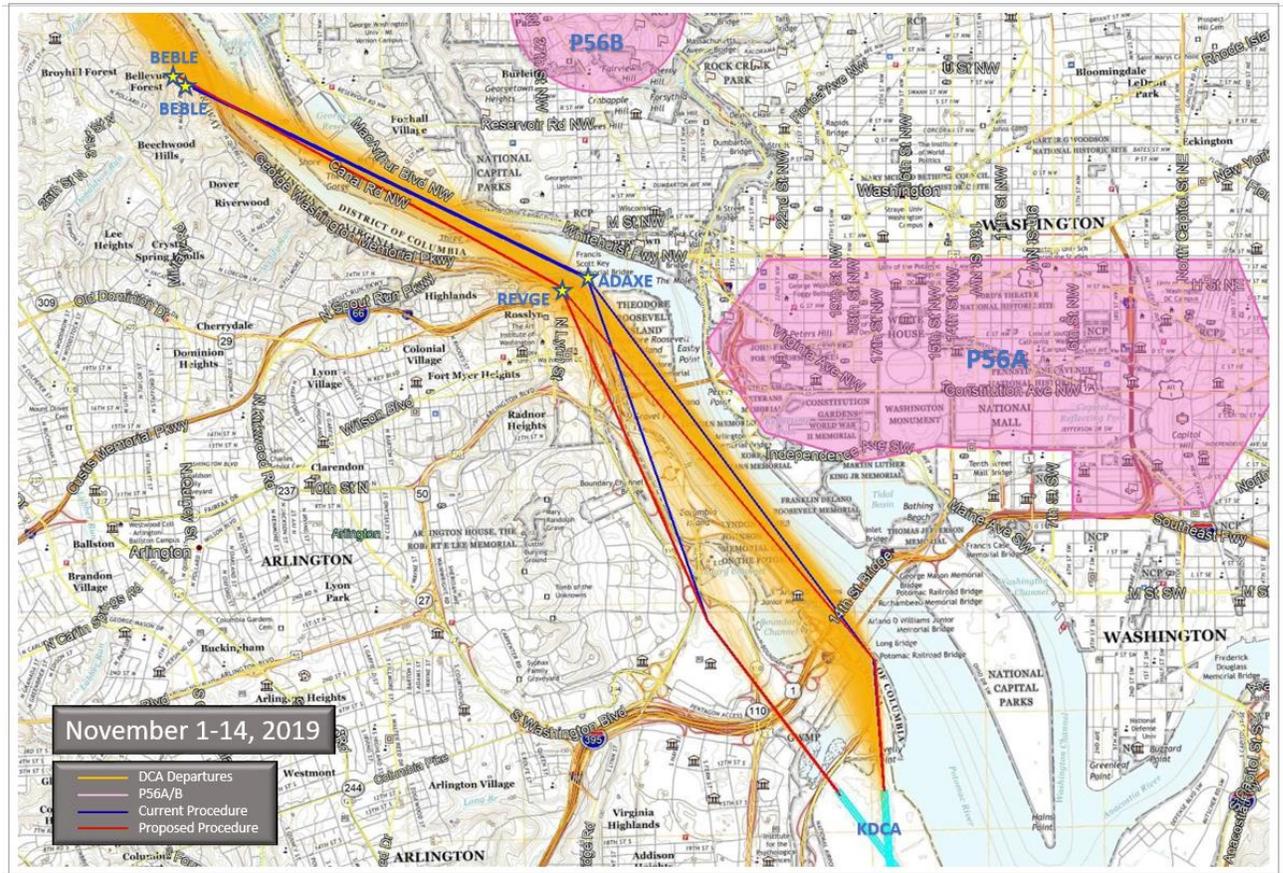


Figure 1. Original and proposed amended procedure, original procedure (blue lines) and proposed procedure (red lines). The orange shading represents radar tracks depicting aircraft location from November 1-14, 2019.

Area of Potential Effects

As part of its responsibilities under Section 106, the FAA attempted to identify the Area of Potential Effects for the undertaking. The Section 106 regulations define the APE as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” 36 CFR § 800.16(d).

The Proposed Action will not cause any physical effects. However, pursuant to 36 CFR 800.5(a)(2)(v), the FAA also considered the potential for the undertaking to introduce visual, atmospheric, or audible elements that could diminish the integrity of a historic property's significant historic features. The FAA compared the flight tracks of aircraft flying the REVGE waypoint to those still using the ADAXE waypoint. The comparison is depicted in Figure 2. Based on this comparison, the FAA determined that there would be no new areas overflowed by the Proposed Action, and therefore no potential to introduce new visual, atmospheric or audible elements.

The FAA also considered the potential for the undertaking to have noise effects that could alter the character or use of historic properties. The FAA conducted a noise screen to determine how this undertaking would affect current aircraft noise exposure levels. This analysis indicated that the undertaking would not result in any noise increase that would be “significant” or “reportable” as defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.

In sum, after careful evaluation of aircraft radar tracks for the proposed action compared to the no action alternative, the FAA determined that the outer boundaries of the flight corridor did not expand when aircraft used the new REVGE waypoint. Refer to **Figure 2** to view the comparison of radar flight tracks from February 6-11, 2020. Additionally, the FAA's noise screening tool AEDT did not indicate any measurable change in noise level (no reportable or significant noise increase). Refer to **Attachment A** to review the AEDT noise screening analysis report. Based on the FAA's determination that this undertaking does not have an Area of Potential Effects, the FAA is proposing a finding of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

KDCA All Departures – Feb 6 – Feb11, 2020 – 2356 Tracks

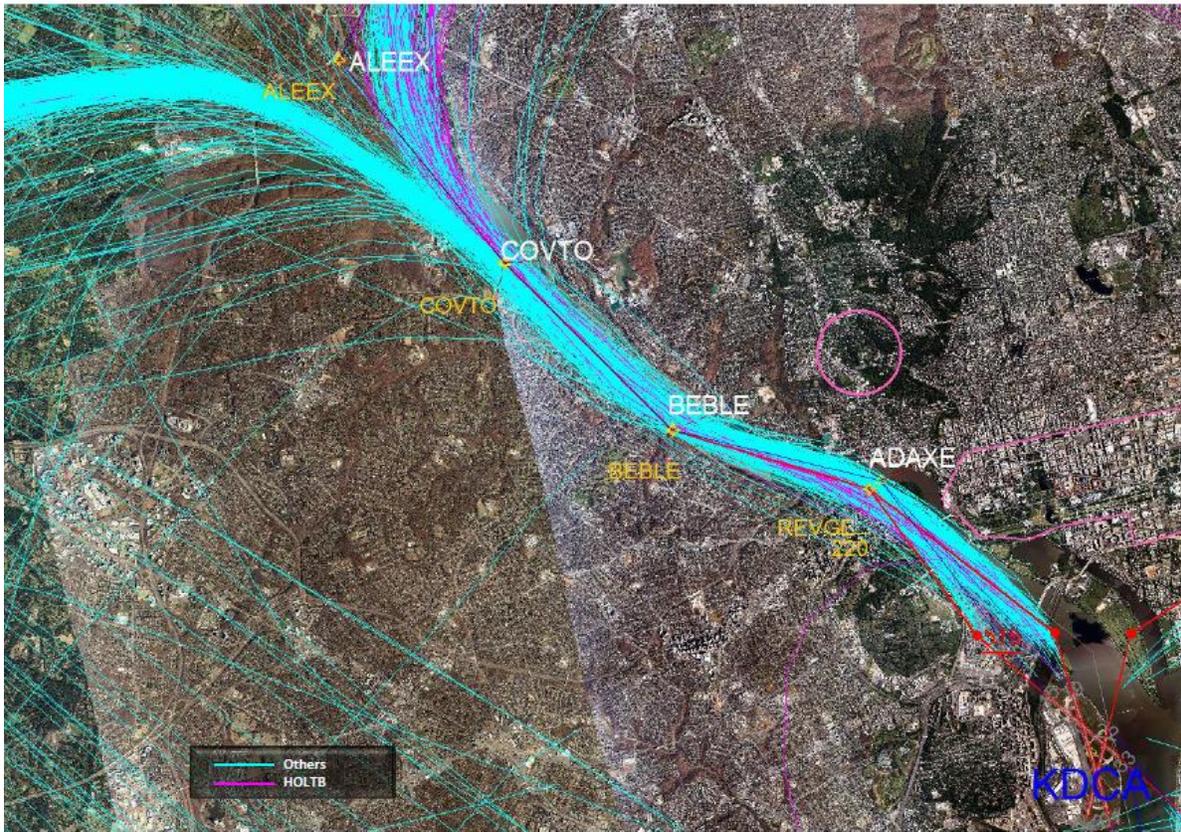


Figure 2. No action alternative flight radar tracks (light blue) versus the proposed action flight radar tracks (magenta) for the period February 6 - February 11, 2020.

Request for Concurrence

The FAA requests your review of the information listed within this document, and we seek your concurrence with the FAA's finding pursuant to 36 CFR 800.4(d)(1) that no historic properties would be affected by the amended waypoint to north-flow departure procedures at DCA. As set forth in 36 CFR 800.4(d)(1)(i), any objections must be filed within 30 days receipt of the FAA's finding. If you desire to provide comments or objections, please provide them by letter or email within 30 days to the undersigned at the following address:

Andy Pieroni, Environmental Protection Specialist
Eastern Service Center - Operations Support Group, AJV-E250
1701 Columbia Avenue
College Park, GA 30337
(404) 305-5586 (tel)
(404)-305-5572 (fax)
E-mail address for questions: andrew.pieroni@faa.gov

The FAA would like to thank you for your interest in this project. If you have any questions about the information provided, please feel free to contact me at 404-305-5571.

Sincerely,

Charles J Gibson

For
Ryan Almasy
Manager, Operations Support Group, AJV-E200
Eastern Service Center
Federal Aviation Administration

ATTACHMENTS

Attachment A: Noise Screening Report

Noise Screening Analysis Report

For

Ronald Reagan Washington National Airport

KDCA

Washington, DC

Prepared by:

ATO, AJV-114, Environmental Policy Team

Friday, February 21, 2020

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Summary

Noise analysis was completed to assess potential impacts resulting from proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC, using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Historical radar track data was used to create a baseline scenario. After the baseline scenario was built, aircraft operations assigned to the proposed procedure were modeled as flying the proposed procedure, which provides the alternative scenario. Selections for track assignments were made based on historical flight paths, and RNAV capable aircraft were assigned to the procedure nearest to their historical tracks in the alternative scenario.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. In the case of DCA, there was no significant or reportable increase in noise resulting from the proposed action.

Purpose

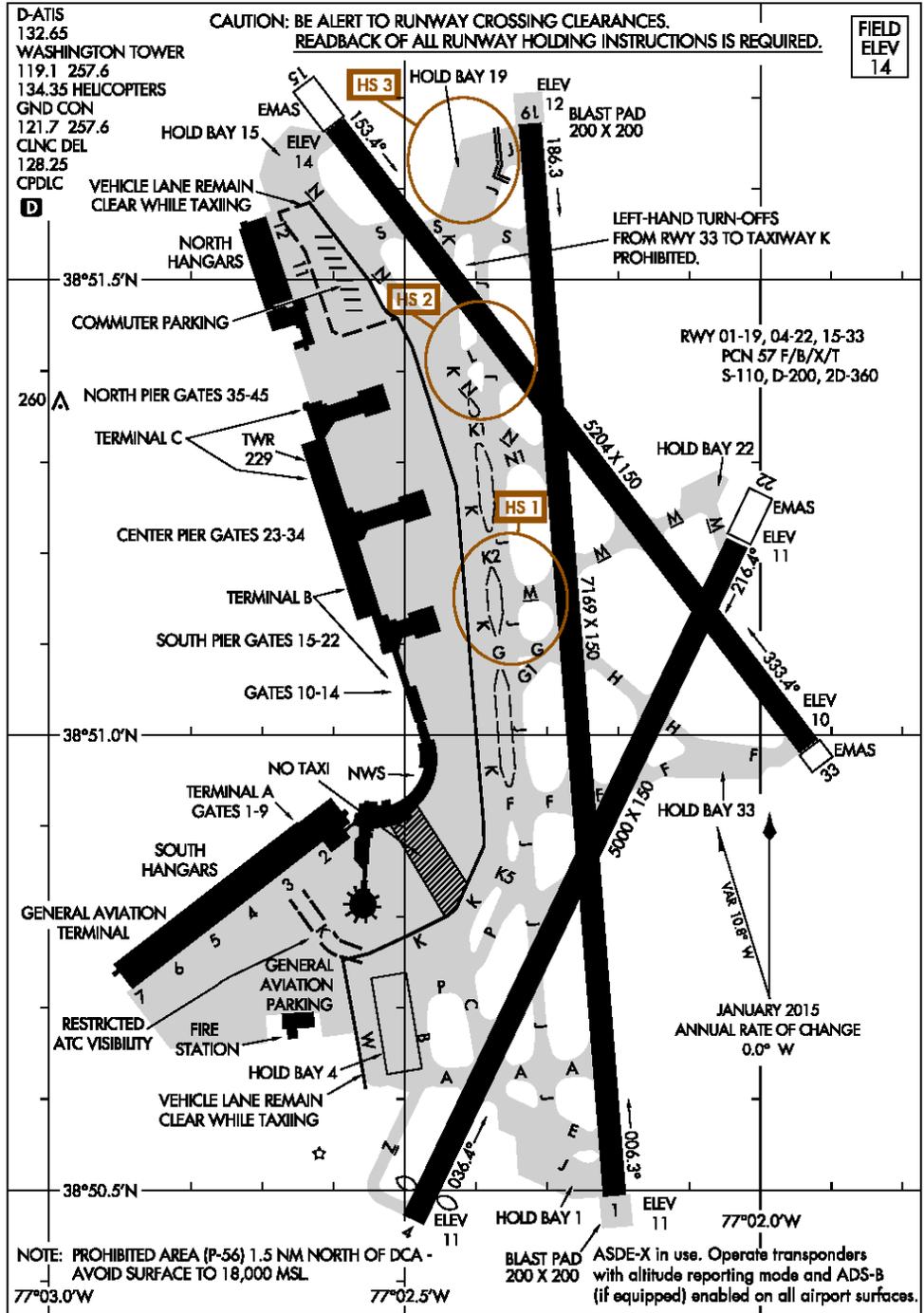
The purpose of this report is to document the process used to analyze the noise impact of proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC and to present the results of that analysis. The analysis of the instrument flight procedures at DCA was performed using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Figure 1 shows the airport diagram for DCA, which provides the runway layout and the airport's field elevation. Table 1 shows the procedure name, type and publication date.

Table 1: Proposed Procedures Modeled for DCA

Procedure Name	Procedure Type
AMEEE ONE	RNAV SID
CLTCH TWO	RNAV SID
DOCTR FIVE	RNAV SID
HORTO THREE	RNAV SID
JDUBB TWO	RNAV SID
REBLL FOUR	RNAV SID
SCRAM FOUR	RNAV SID
SOOKI FIVE	RNAV SID
WYNGS FOUR	RNAV SID

19283 **AIRPORT DIAGRAM** RONALD REAGAN WASHINGTON NATIONAL (DCA)
AL-443 (FAA) WASHINGTON, D.C.



AIRPORT DIAGRAM WASHINGTON, D.C.
19283 **RONALD REAGAN WASHINGTON NATIONAL (DCA)**

Figure 1: Airport Diagram of DCA

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Methods

Noise screening was completed using the TARGETS Environmental Plug-in tool to calculate Day-Night Average Sound Levels (DNL) from existing operations (baseline) and modeled operations to replicate the proposed action (alternative). Historical radar track data for DCA was obtained from the Performance Data Analysis and Reporting System (PDARS). After concurrence of the dates to be used by the environmental specialist and air traffic facility, 60 days of random radar track data were selected for the DCA analysis representing a range of temperature and wind conditions as well as being representative of the average runway usage. A list of the tracks selected for analysis are shown in Appendix A.

After the removal of overflights, incomplete track segments, and other unusable tracks, 24,743 tracks were used for the analysis. The altitude of the historical tracks was considered and a range ring was set to contain the area where most of the tracks reached above 10,000 feet Above Field Elevation (AFE). This established the study area and the tracks outside of the study area were removed from the analysis. In the case of DCA, the study area is a circle with a radius of 40 nautical miles (nm) centered over the airport.

The randomly selected dates are presumed to represent average traffic counts and traffic flows through various seasons and peak travel times for DCA. There were no significant runway outages or significant conditions that would otherwise result in abnormal traffic counts or traffic flows. In order to calculate the Average Annual Day (AAD) impacts, traffic counts for average daily departures and arrivals used for annualization in this analysis were obtained through the FAA's AFS Data Analytics Runway Usage Module.

Historical radar track data was used to create a baseline noise exposure, which provides lateral path definition, aircraft fleet mix, departure/arrival stream proportions for each runway, and day/night traffic ratios. The alternative scenario was built by taking aircraft operations and assigning them to the proposed procedure instead of their historical tracks. RNAV capable aircraft were assigned to the procedure based on their historical tracks, proximity to other procedures, and any additional usage information from the Environmental Specialist. In the case of DCA, all operations departing from runways 01 and 03 were assigned to a proposed procedure.

The analysis does not take into account terrain. All calculations were made in reference to the airport's field elevation. The altitude controls were based on AEDT standard aircraft profiles. With respect to lateral distribution, a 0.5 nm dispersion for RNAV procedures was used and a 0.3 nm dispersion for RNP procedures was used based standard methods for noise screening. For tracks near the runway where dispersion is normally less than 0.3 nm, dispersion was based on historical track data.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. The Environmental Plug-in Tool uses the Aviation Environmental Design Tool to calculate noise. The noise output files from AEDT for both the baseline and alternative noise exposures consist of a series of equally spaced grid points, each showing the DNL value. The noise grid (receptor set) is a square grid extending 30 nm in each direction of the airport with grid points (receptors) spaced 0.25 nm apart. The noise results of the baseline and alternative scenarios were then compared to test for potential noise impacts.

The noise impact is a comparison between the baseline and the alternative noise exposure that depicts reportable and significant noise changes at all affected locations per the criteria indicated in FAA Order 1050.1F and Chapter 32 of FAA Order 7400.2K. The reportable and significant noise increases and decreases (if any) are then depicted on an aerial map.

Results

1. Noise Exposure

The baseline and alternative noise exposure is shown in Figure 3-1 and Figure 3-2, which depicts the levels and locations of the noise produced by the historical radar track data for arrivals and departures.

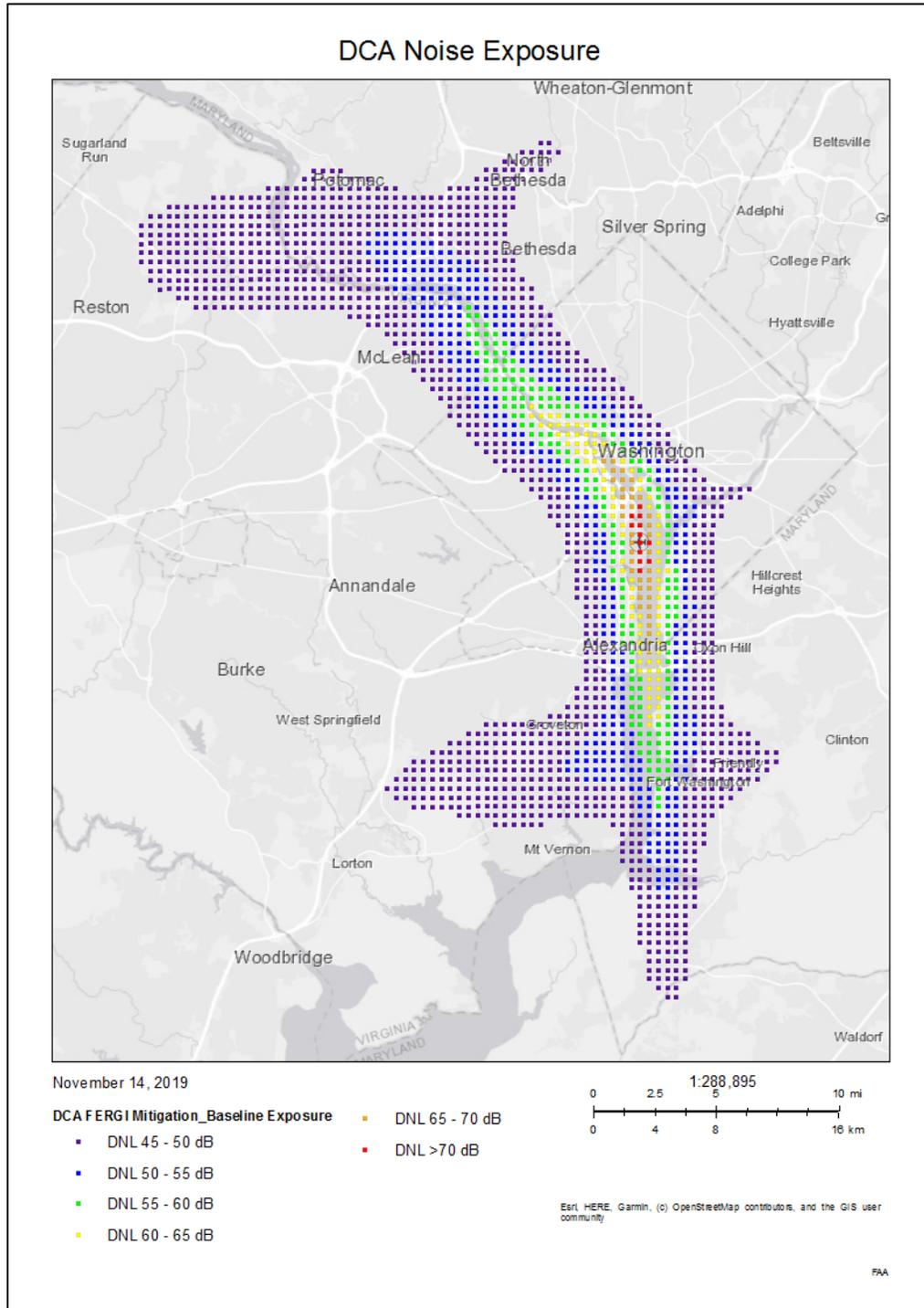


Figure 3-1: Baseline Noise Exposure in TARGETS

DCA Noise Screening Analysis Report *For Official Internal Use Only*

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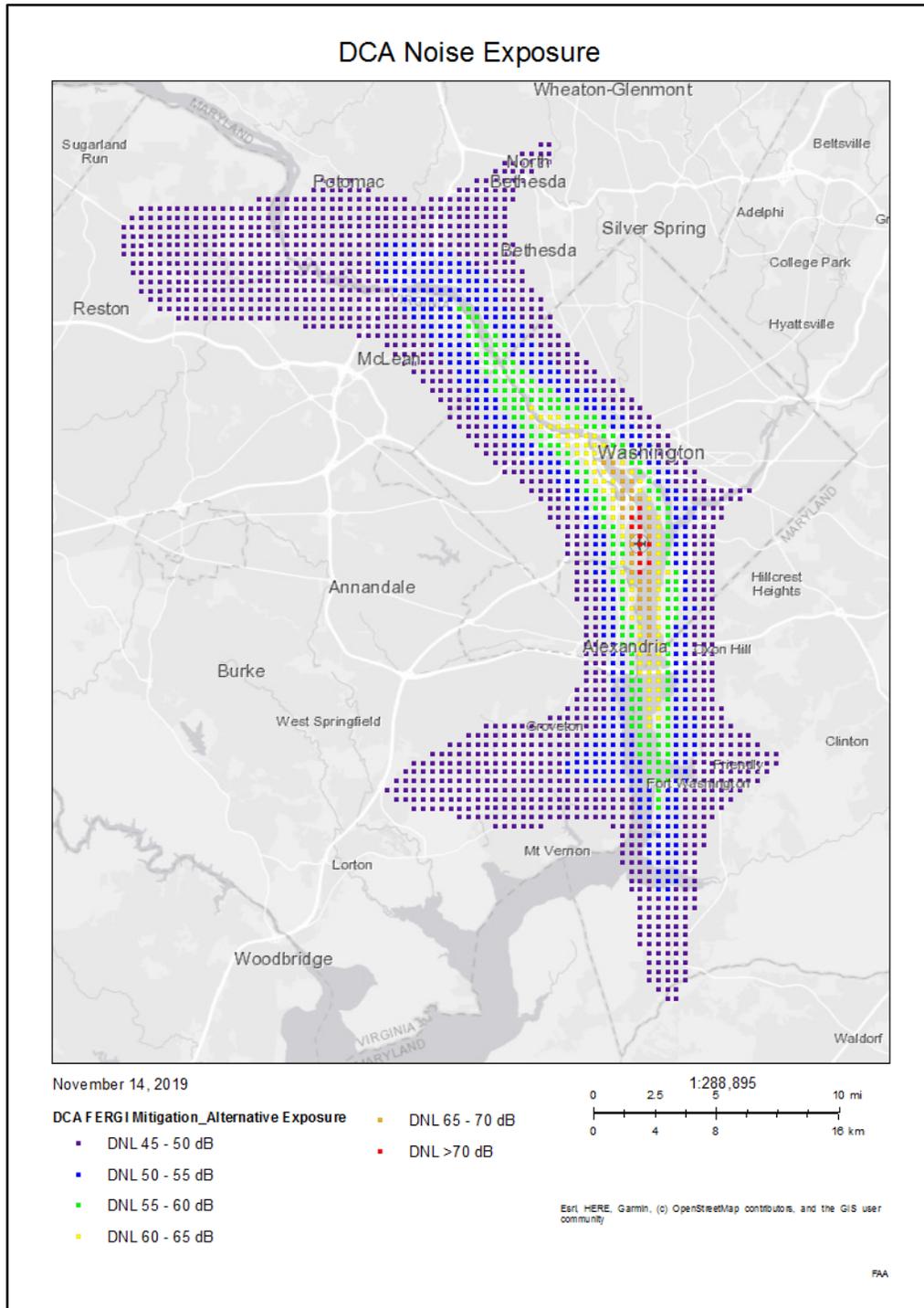


Figure 3-2: Alternative Noise Exposure for the Proposed Procedures in TARGETS

DCA Noise Screening Analysis Report *For Official Internal Use Only*

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2. Noise Impacts

A comparison of the baseline and alternative scenarios by the TARGETS Environmental plug-in determines the noise impacts of the proposed action. Significance of noise impacts is defined by FAA Order 1050.1F¹ which establishes the threshold for significant increases in noise exposure. Where the proposed action results in a noise impact, TARGETS graphically displays a noise impact layer that indicates the locations of reportable and significant changes. When applicable, these impacts are shown overlaying a map view of the area surrounding the airport. In the case of DCA, there was **no reportable or significant increase in noise resulting from the proposed action.**

¹ According to Exhibit 4-1 of FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, a noise impact is significant if “*The action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.*”

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This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Appendix A Random Tracks Used for Analysis

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Attachment B: Letter from US Secret Service to the FAA Requesting New Flight ProceduresU.S. Department of Homeland Security
UNITED STATES SECRET SERVICE

Washington, D.C. 20223

August 15, 2018

Mr. Daniel K. Elwell
Acting Administrator
U.S. Department of Transportation
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Dear Mr. Elwell:

I am writing you to discuss flight incursions into the Prohibited Area P-56, District of Columbia. The proximity of Ronald Reagan Washington National Airport (KDCA) to the White House and Naval Observatory, creates a significant security risk for the U.S. Secret Service (Secret Service). Pursuant to Title 18, Section 3056, of the United States Code, the Secret Service is responsible for implementing appropriate security procedures for the President, Vice President, and visiting heads of state. In accordance with these responsibilities, the Secret Service must ensure the security of the airspace above the White House and the Naval Observatory, both of which fall within the Prohibited Area P-56. Over the past few years the Secret Service has observed an increase in flight violations into the Prohibited Area P-56 from aircraft departing and arriving KDCA, resulting in an annual incursion increase of approximately thirty percent. The increased numbers of aircraft violating the Prohibited Area P-56 has caused great concern for the Secret Service.

Pursuant to 14 CFR Part 73 [Airspace Docket No. 98-AWA-4] Change of Using Agency for Prohibited Area P-56, from the Administrator of the Federal Aviation Administration to the Secret Service, I would respectfully request that the Federal Aviation Administration identify and implement new procedures for aircraft operating out of KDCA. The objective of the Secret Service, regarding this request, is to reduce and ultimately eliminate aircraft violations of the Prohibited Area P-56. Each incursion provokes a significant coordinated response from the Department of Defense and numerous federal agencies, including the Secret Service, causing the expenditure of valuable resources while also affecting commercial and other air traffic in the National Capital Region. Additionally, this request will reduce the exposure to potential liability which commercial airlines, air charter companies, and individual pilots face for each incursion.

Thank you for any assistance you can provide with this request. Should you wish to discuss this matter further, please do not hesitate to contact Deputy Assistant Director, Special Operations, James Lewis on 202-406-5452.

Sincerely,

A handwritten signature in blue ink that reads "R.D. Alles".

Randolph D. "Tex" Alles

202001365



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



F
FAA
EJR

February 25, 2020

Ms. Amanda Apple, Preservation Officer
MHT, Project Review and Compliance
100 Community Place
Crownsville, MD 21032

Dear Ms. Apple:

Subject: Federal Aviation Administration (FAA) Proposal to Publish Amended Air Traffic Procedures at Reagan National Airport – Amended waypoint of nine northbound Departure Procedures

MD

The Federal Aviation Administration (FAA) is conducting an environmental review to consider the potential environmental impacts for the amendment of a waypoint used by nine departure procedures serving Ronald Reagan Washington National Airport (DCA) in Arlington County, Virginia (Proposed Action). The FAA has determined that the Proposed Action is an undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. § 470 et seq.) and its implementing regulations at 35 C.F.R. Part 800. This letter presents the FAA’s review of whether the project has an Area of Potential Effects and the FAA’s determination that no historic properties would be affected by the undertaking, pursuant to 36 C.F.R. 800.4(d)(1). Information supporting this finding, including a description of the undertaking and the FAA’s review of whether this project will affect historic properties and other information required by 36 C.F.R. 800.11(d) is contained within this correspondence.

The FAA respectfully requests your review of the information listed in this document and seeks your concurrence with our determination that the amended waypoint to departure procedures at DCA would not affect historic properties. As explained in greater detail below, the FAA has not designated an Area of Potential Effect (APE) because, as demonstrated by Figure 2, the Proposed Action is not expected to expand the flight corridor flown by current aircraft. As a result, the Proposed Action will not introduce any visual, atmospheric, or audible elements to new areas. In addition, the FAA’s noise screen for the Proposed Action, enclosed with this letter, concludes that the Proposed Action will not cause any reportable¹ or significant² noise impacts. Refer to **Attachment A** to review the Noise Screening Report.

¹ Under FAA policy, an increase in the Day-Night Average Sound Level (DNL) of 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, is significant. FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, Exhibit 4-1. DNL is the 24-hour average sound level, in decibels, for the period from midnight to midnight, obtained after the addition of ten decibels to sound levels for the periods between midnight and 7 a.m., and between 10 p.m., and midnight, local time.

² Under FAA policy, noise increases are “reportable” if the DNL increases by 5 dB or more within areas exposed to DNL 45-60 dB, or by 3 dB or more within areas exposed to DNL 60-65 dB. FAA Order 1050.1F, Appendix B, section B-1.4.

418 AC 3/17/2020

Project Description

On January 30, 2020, the FAA began conducting a temporary air traffic test to move a waypoint, ADAXE, 784 feet to the southwest, and rename that waypoint REVGE as part of the publication of a new departure procedure called HOLT B. **Note: Departure procedures such as HOLT B are a series of waypoints that aircraft fly by in order to route aircraft in a safe and efficient manner.** The temporary procedure has been used by approximately ten percent of north-flow departures at DCA since its implementation, which allows the FAA to compare the impact of using waypoint ADAXE to waypoint REVGE.

The purpose of the temporary HOLT B procedure and the FAA's Proposed Action is to enhance national security. The Proposed Action was developed because of a longstanding concern from the United States Secret Service caused by airlines penetrating the Prohibited Area P-56, which protects a portion of the National Mall in Washington, D.C. and the White House. Since 2012, over 300 incursions have occurred, which resulted in the U.S. Secret Service requesting that the FAA Administrator identify and implement changes for aircraft operating out of DCA to reduce aircraft violations of the Prohibited Area P-56. **Attachment B** contains a copy of the letter from the U.S. Secret Service to the FAA. In consultation with the Secret Service, the FAA identified amending the REVGE waypoint as a way to move aircraft away from P-56 while still flying over the Potomac River, which is consistent with longstanding community requests to manage aircraft noise from DCA. The FAA's Aviation Environmental Screening Tool (AEDT) was used to conduct noise screening to evaluate whether there would be noise impacts as a result of implementing the amended waypoint for all north-flow departure procedures at DCA. The results of the modeling, contained in Attachment A, indicated that there would be no reportable or significant noise impacts.

As noted above, the FAA published the temporary HOLT B procedure on January 30, 2020, to temporarily evaluate the effectiveness of the REVGE amendment and to ensure pilots and their planes could fly the procedure as designed by the FAA. **Figure 1** contains a depiction of the proposed amended procedure. Based on the initial results of the HOLT B, which indicates the amended waypoint meets the purpose and need of reducing incursions into P-56, the FAA is proposing to permanently implement the HOLT B as well as amend the remaining existing north-flow departure procedures at DCA so that all aircraft follow the new REVGE waypoint. Indeed, Figure 2 demonstrates that the use of the REVGE waypoint moves aircraft away from P-56 while still keeping them within the current corridor of flight tracks from aircraft using the ADAXE waypoint. As a result, the FAA is not introducing aircraft into any new areas, and aircraft will continue to fly over the Potomac River. As part of the FAA's environmental review for the Proposed Action, the FAA is engaging with your office pursuant to Section 106 of the National Historic Preservation Act.

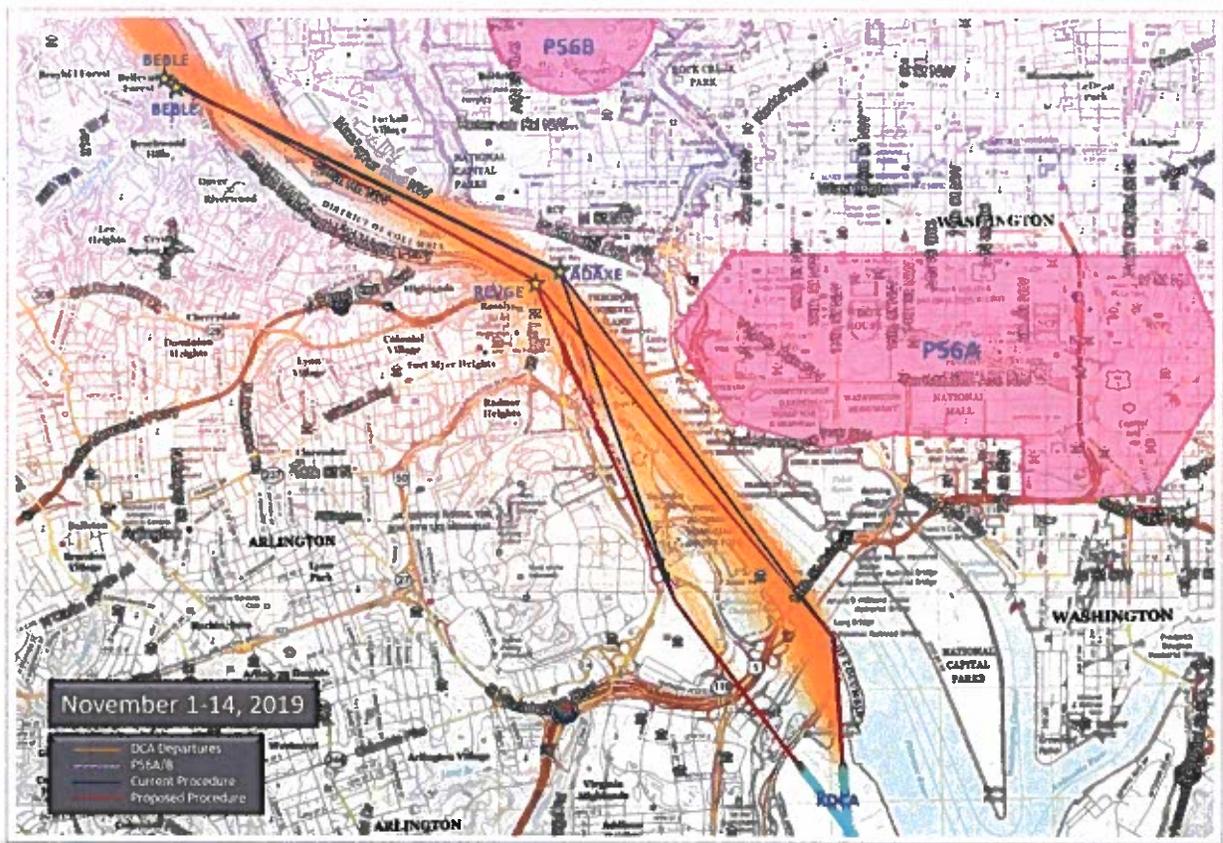


Figure 1. Original and proposed amended procedure, original procedure (blue lines) and proposed procedure (red lines). The orange shading represents radar tracks depicting aircraft location from November 1-14, 2019.

Area of Potential Effects

As part of its responsibilities under Section 106, the FAA attempted to identify the Area of Potential Effects for the undertaking. The Section 106 regulations define the APE as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” 36 CFR § 800.16(d).

The Proposed Action will not cause any physical effects. However, pursuant to 36 CFR 800.5(a)(2)(v), the FAA also considered the potential for the undertaking to introduce visual, atmospheric, or audible elements that could diminish the integrity of a historic property's significant historic features. The FAA compared the flight tracks of aircraft flying the REVGE waypoint to those still using the ADAXE waypoint. The comparison is depicted in Figure 2. Based on this comparison, the FAA determined that there would be no new areas overflowed by the Proposed Action, and therefore no potential to introduce new visual, atmospheric or audible elements.

The FAA also considered the potential for the undertaking to have noise effects that could alter the character or use of historic properties. The FAA conducted a noise screen to determine how this undertaking would affect current aircraft noise exposure levels. This analysis indicated that the undertaking would not result in any noise increase that would be “significant” or “reportable” as defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.

In sum, after careful evaluation of aircraft radar tracks for the proposed action compared to the no action alternative, the FAA determined that the outer boundaries of the flight corridor did not expand when aircraft used the new REVGE waypoint. Refer to **Figure 2** to view the comparison of radar flight tracks from February 6-11, 2020. Additionally, the FAA's noise screening tool AEDT did not indicate any measurable change in noise level (no reportable or significant noise increase). Refer to **Attachment A** to review the AEDT noise screening analysis report. Based on the FAA's determination that this undertaking does not have an Area of Potential Effects, the FAA is proposing a finding of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

KDCA All Departures – Feb 6 – Feb11, 2020 – 2356 Tracks

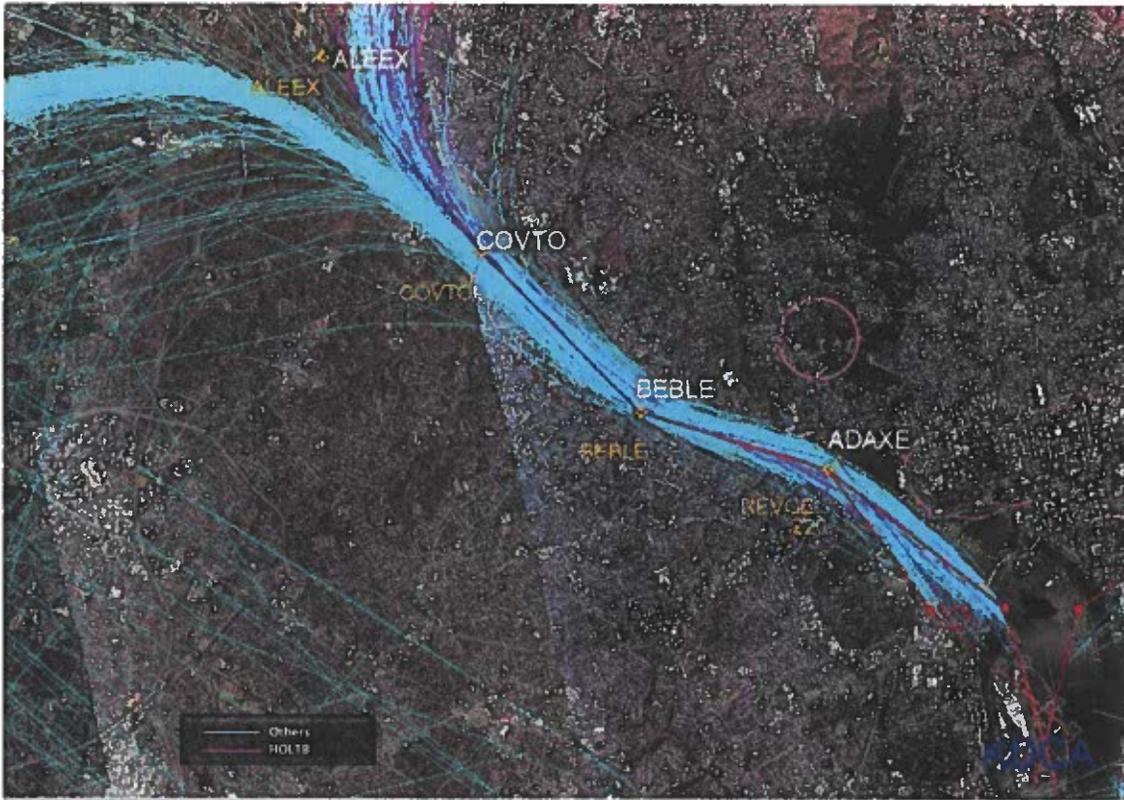


Figure 2. No action alternative flight radar tracks (light blue) versus the proposed action flight radar tracks (magenta) for the period February 6 - February 11, 2020.

Request for Concurrence

The FAA requests your review of the information listed within this document, and we seek your concurrence with the FAA's finding pursuant to 36 CFR 800.4(d)(1) that no historic properties would be affected by the amended waypoint to north-flow departure procedures at DCA. As set forth in 36 CFR 800.4(d)(1)(i), any objections must be filed within 30 days receipt of the FAA's finding. If you desire to provide comments or objections, please provide them by letter or email within 30 days to the undersigned at the following address:

Andy Pieroni, Environmental Protection Specialist
Eastern Service Center - Operations Support Group, AJV-E250
1701 Columbia Avenue
College Park, GA 30337
(404) 305-5586 (tel)
(404)-305-5572 (fax)
E-mail address for questions: andrew.pieroni@faa.gov

The FAA would like to thank you for your interest in this project. If you have any questions about the information provided, please feel free to contact me at 404-305-5571.

Sincerely,

Charles J Gibson

For
Ryan Almasy
Manager, Operations Support Group, AJV-E200
Eastern Service Center
Federal Aviation Administration

⊗

The Maryland Historical Trust has determined that there are no historic properties affected by this undertaking.

Beth Cole *3/18/2020*
Date

⊗

We concur with FAA's determination based on the information provided. Should there be substantive changes to the proposed action, we would await further consultation with FAA as appropriate pursuant to Section 106 of NHPA.



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

February 25, 2020

Ms. Julie Langan
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Langan:

Subject: Federal Aviation Administration (FAA) Proposal to Publish Amended Air Traffic Procedures at Reagan National Airport – Amended waypoint of nine northbound Departure Procedures

The Federal Aviation Administration (FAA) is conducting an environmental review to consider the potential environmental impacts for the amendment of a waypoint used by nine departure procedures serving Ronald Reagan Washington National Airport (DCA) in Arlington County, Virginia (Proposed Action). The FAA has determined that the Proposed Action is an undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. § 470 et seq.) and its implementing regulations at 35 C.F.R. Part 800. This letter presents the FAA’s review of whether the project has an Area of Potential Effects and the FAA’s determination that no historic properties would be affected by the undertaking, pursuant to 36 C.F.R. 800.4(d)(1). Information supporting this finding, including a description of the undertaking and the FAA’s review of whether this project will affect historic properties and other information required by 36 C.F.R. 800.11(d) is contained within this correspondence.

The FAA respectfully requests your review of the information listed in this document and seeks your concurrence with our determination that the amended waypoint to departure procedures at DCA would not affect historic properties. As explained in greater detail below, the FAA has not designated an Area of Potential Effect (APE) because, as demonstrated by Figure 2, the Proposed Action is not expected to expand the flight corridor flown by current aircraft. As a result, the Proposed Action will not introduce any visual, atmospheric, or audible elements to new areas. In addition, the FAA’s noise screen for the Proposed Action, enclosed with this letter, concludes that the Proposed Action will not cause any reportable¹ or significant² noise impacts. Refer to **Attachment A** to review the Noise Screening Report.

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The purpose of the temporary HOLT B procedure and the FAA's Proposed Action is to enhance national security. The Proposed Action was developed because of a longstanding concern from the United States Secret Service caused by airlines penetrating the Prohibited Area P-56, which protects a portion of the National Mall in Washington, D.C. and the White House. Since 2012, over 300 incursions have occurred, which resulted in the U.S. Secret Service requesting that the FAA Administrator identify and implement changes for aircraft operating out of DCA to reduce aircraft violations of the Prohibited Area P-56. **Attachment B** contains a copy of the letter from the U.S. Secret Service to the FAA. In consultation with the Secret Service, the FAA identified amending the REVGE waypoint as a way to move aircraft away from P-56 while still flying over the Potomac River, which is consistent with longstanding community requests to manage aircraft noise from DCA. The FAA's Aviation Environmental Screening Tool (AEDT) was used to conduct noise screening to evaluate whether there would be noise impacts as a result of implementing the amended waypoint for all north-flow departure procedures at DCA. The results of the modeling, contained in Attachment A, indicated that there would be no reportable or significant noise impacts.

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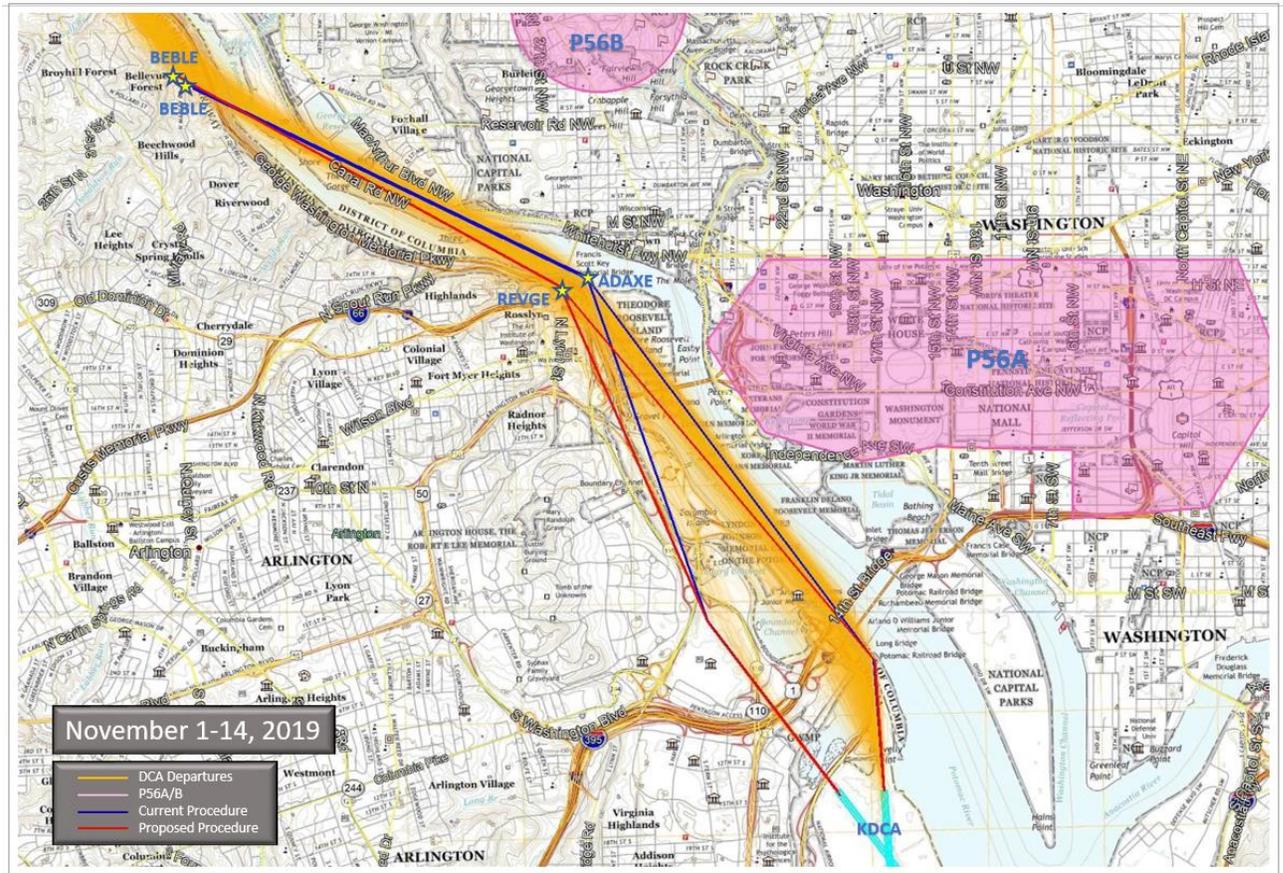


Figure 1. Original and proposed amended procedure, original procedure (blue lines) and proposed procedure (red lines). The orange shading represents radar tracks depicting aircraft location from November 1-14, 2019.

Area of Potential Effects

As part of its responsibilities under Section 106, the FAA attempted to identify the Area of Potential Effects for the undertaking. The Section 106 regulations define the APE as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” 36 CFR § 800.16(d).

The Proposed Action will not cause any physical effects. However, pursuant to 36 CFR 800.5(a)(2)(v), the FAA also considered the potential for the undertaking to introduce visual, atmospheric, or audible elements that could diminish the integrity of a historic property's significant historic features. The FAA compared the flight tracks of aircraft flying the REVGE waypoint to those still using the ADAXE waypoint. The comparison is depicted in Figure 2. Based on this comparison, the FAA determined that there would be no new areas overflowed by the Proposed Action, and therefore no potential to introduce new visual, atmospheric or audible elements.

The FAA also considered the potential for the undertaking to have noise effects that could alter the character or use of historic properties. The FAA conducted a noise screen to determine how this undertaking would affect current aircraft noise exposure levels. This analysis indicated that the undertaking would not result in any noise increase that would be “significant” or “reportable” as defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.

In sum, after careful evaluation of aircraft radar tracks for the proposed action compared to the no action alternative, the FAA determined that the outer boundaries of the flight corridor did not expand when aircraft used the new REVGE waypoint. Refer to **Figure 2** to view the comparison of radar flight tracks from February 6-11, 2020. Additionally, the FAA's noise screening tool AEDT did not indicate any measurable change in noise level (no reportable or significant noise increase). Refer to **Attachment A** to review the AEDT noise screening analysis report. Based on the FAA's determination that this undertaking does not have an Area of Potential Effects, the FAA is proposing a finding of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

KDCA All Departures – Feb 6 – Feb11, 2020 – 2356 Tracks

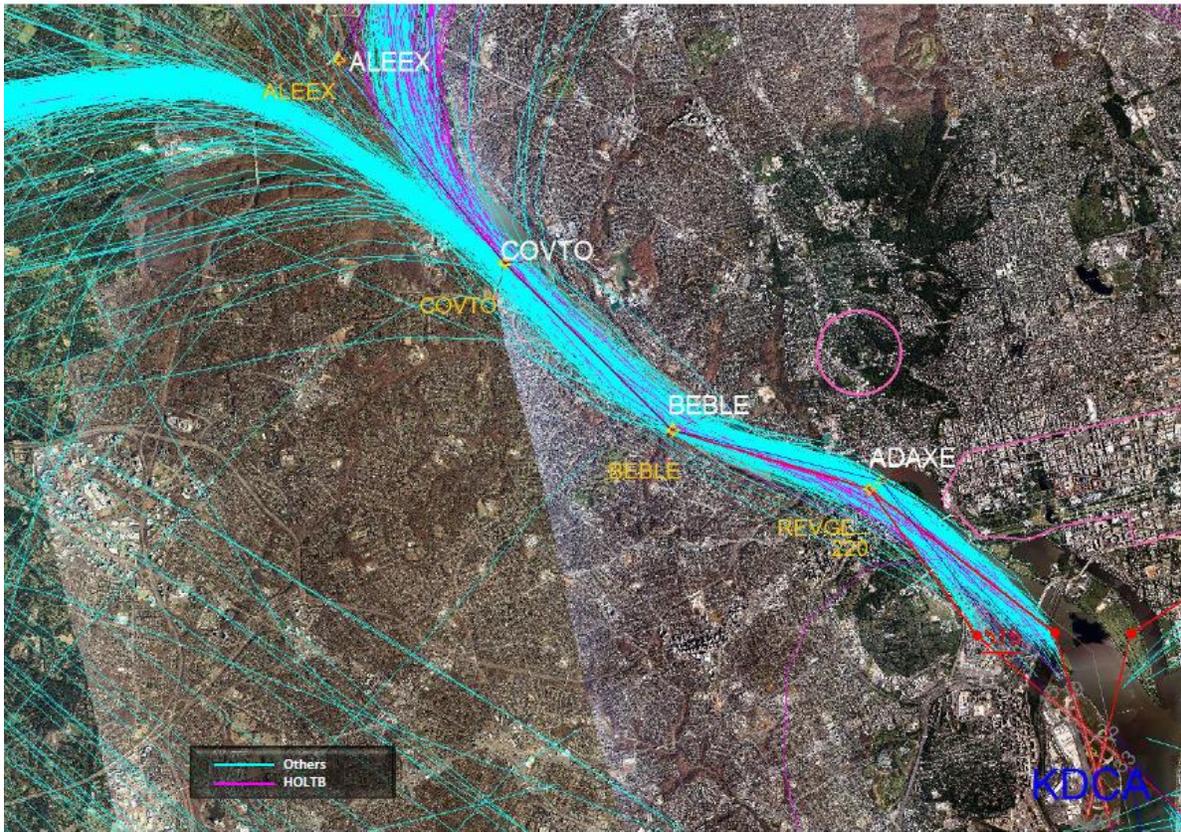


Figure 2. No action alternative flight radar tracks (light blue) versus the proposed action flight radar tracks (magenta) for the period February 6 - February 11, 2020.

Request for Concurrence

The FAA requests your review of the information listed within this document, and we seek your concurrence with the FAA's finding pursuant to 36 CFR 800.4(d)(1) that no historic properties would be affected by the amended waypoint to north-flow departure procedures at DCA. As set forth in 36 CFR 800.4(d)(1)(i), any objections must be filed within 30 days receipt of the FAA's finding. If you desire to provide comments or objections, please provide them by letter or email within 30 days to the undersigned at the following address:

Andy Pieroni, Environmental Protection Specialist
Eastern Service Center - Operations Support Group, AJV-E250
1701 Columbia Avenue
College Park, GA 30337
(404) 305-5586 (tel)
(404)-305-5572 (fax)
E-mail address for questions: andrew.pieroni@faa.gov

The FAA would like to thank you for your interest in this project. If you have any questions about the information provided, please feel free to contact me at 404-305-5571.

Sincerely,

A handwritten signature in cursive script that reads "Charles J. Gibson".

For

Ryan Almasy
Manager, Operations Support Group, AJV-E200
Eastern Service Center
Federal Aviation Administration

ATTACHMENTS

Attachment A: Noise Screening Report

Noise Screening Analysis Report

For

Ronald Reagan Washington National Airport

KDCA

Washington, DC

Prepared by:

ATO, AJV-114, Environmental Policy Team

Friday, February 21, 2020

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Summary

Noise analysis was completed to assess potential impacts resulting from proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC, using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Historical radar track data was used to create a baseline scenario. After the baseline scenario was built, aircraft operations assigned to the proposed procedure were modeled as flying the proposed procedure, which provides the alternative scenario. Selections for track assignments were made based on historical flight paths, and RNAV capable aircraft were assigned to the procedure nearest to their historical tracks in the alternative scenario.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. In the case of DCA, there was no significant or reportable increase in noise resulting from the proposed action.

Purpose

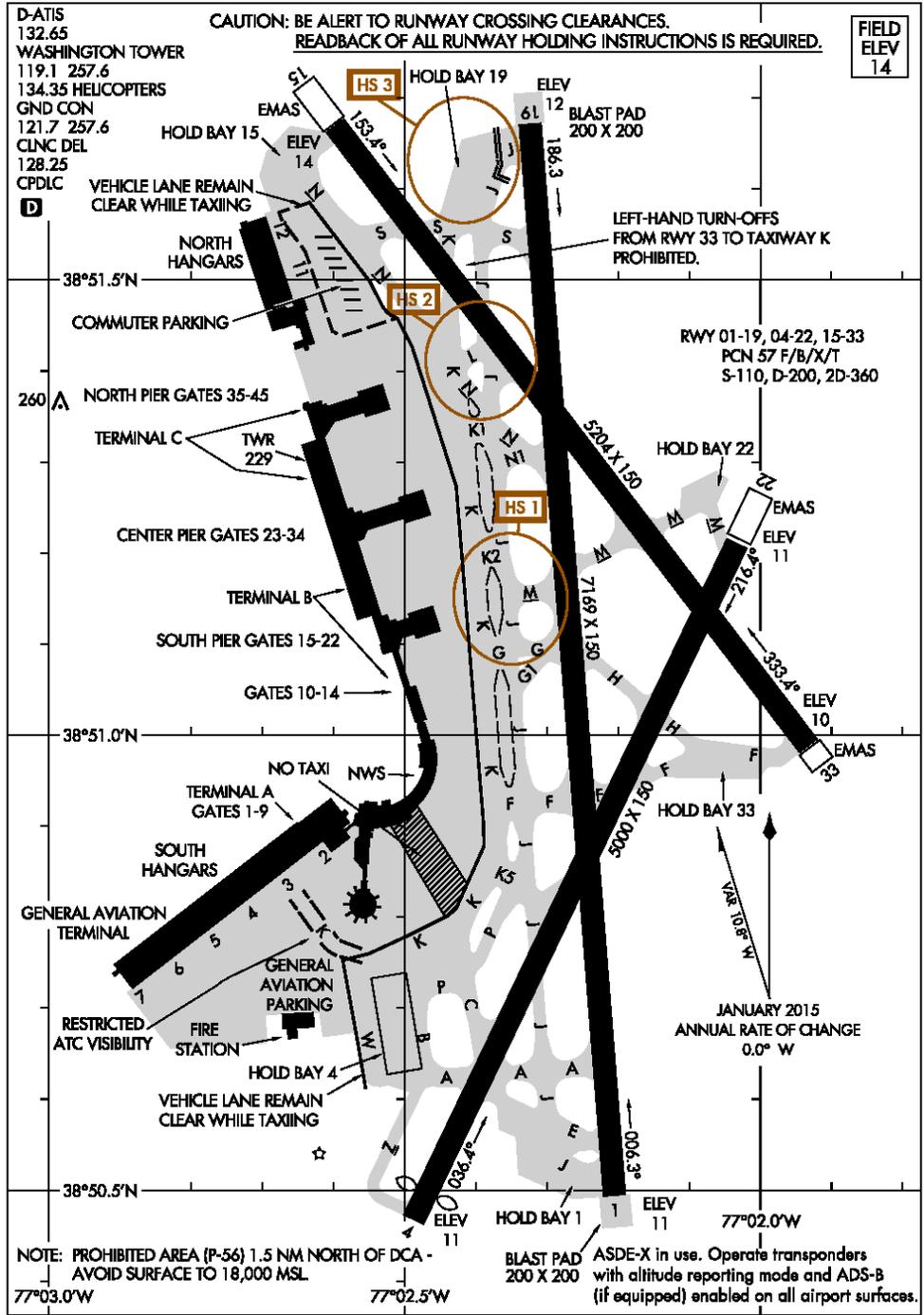
The purpose of this report is to document the process used to analyze the noise impact of proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC and to present the results of that analysis. The analysis of the instrument flight procedures at DCA was performed using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Figure 1 shows the airport diagram for DCA, which provides the runway layout and the airport's field elevation. Table 1 shows the procedure name, type and publication date.

Table 1: Proposed Procedures Modeled for DCA

Procedure Name	Procedure Type
AMEEE ONE	RNAV SID
CLTCH TWO	RNAV SID
DOCTR FIVE	RNAV SID
HORTO THREE	RNAV SID
JDUBB TWO	RNAV SID
REBLL FOUR	RNAV SID
SCRAM FOUR	RNAV SID
SOOKI FIVE	RNAV SID
WYNGS FOUR	RNAV SID

19283 **AIRPORT DIAGRAM** RONALD REAGAN WASHINGTON NATIONAL (DCA)
 AL-443 (FAA) WASHINGTON, D.C.



AIRPORT DIAGRAM WASHINGTON, D.C.
 19283 **RONALD REAGAN WASHINGTON NATIONAL (DCA)**

Figure 1: Airport Diagram of DCA

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Methods

Noise screening was completed using the TARGETS Environmental Plug-in tool to calculate Day-Night Average Sound Levels (DNL) from existing operations (baseline) and modeled operations to replicate the proposed action (alternative). Historical radar track data for DCA was obtained from the Performance Data Analysis and Reporting System (PDARS). After concurrence of the dates to be used by the environmental specialist and air traffic facility, 60 days of random radar track data were selected for the DCA analysis representing a range of temperature and wind conditions as well as being representative of the average runway usage. A list of the tracks selected for analysis are shown in Appendix A.

After the removal of overflights, incomplete track segments, and other unusable tracks, 24,743 tracks were used for the analysis. The altitude of the historical tracks was considered and a range ring was set to contain the area where most of the tracks reached above 10,000 feet Above Field Elevation (AFE). This established the study area and the tracks outside of the study area were removed from the analysis. In the case of DCA, the study area is a circle with a radius of 40 nautical miles (nm) centered over the airport.

The randomly selected dates are presumed to represent average traffic counts and traffic flows through various seasons and peak travel times for DCA. There were no significant runway outages or significant conditions that would otherwise result in abnormal traffic counts or traffic flows. In order to calculate the Average Annual Day (AAD) impacts, traffic counts for average daily departures and arrivals used for annualization in this analysis were obtained through the FAA's AFS Data Analytics Runway Usage Module.

Historical radar track data was used to create a baseline noise exposure, which provides lateral path definition, aircraft fleet mix, departure/arrival stream proportions for each runway, and day/night traffic ratios. The alternative scenario was built by taking aircraft operations and assigning them to the proposed procedure instead of their historical tracks. RNAV capable aircraft were assigned to the procedure based on their historical tracks, proximity to other procedures, and any additional usage information from the Environmental Specialist. In the case of DCA, all operations departing from runways 01 and 03 were assigned to a proposed procedure.

The analysis does not take into account terrain. All calculations were made in reference to the airport's field elevation. The altitude controls were based on AEDT standard aircraft profiles. With respect to lateral distribution, a 0.5 nm dispersion for RNAV procedures was used and a 0.3 nm dispersion for RNP procedures was used based standard methods for noise screening. For tracks near the runway where dispersion is normally less than 0.3 nm, dispersion was based on historical track data.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. The Environmental Plug-in Tool uses the Aviation Environmental Design Tool to calculate noise. The noise output files from AEDT for both the baseline and alternative noise exposures consist of a series of equally spaced grid points, each showing the DNL value. The noise grid (receptor set) is a square grid extending 30 nm in each direction of the airport with grid points (receptors) spaced 0.25 nm apart. The noise results of the baseline and alternative scenarios were then compared to test for potential noise impacts.

The noise impact is a comparison between the baseline and the alternative noise exposure that depicts reportable and significant noise changes at all affected locations per the criteria indicated in FAA Order 1050.1F and Chapter 32 of FAA Order 7400.2K. The reportable and significant noise increases and decreases (if any) are then depicted on an aerial map.

Results

1. Noise Exposure

The baseline and alternative noise exposure is shown in Figure 3-1 and Figure 3-2, which depicts the levels and locations of the noise produced by the historical radar track data for arrivals and departures.

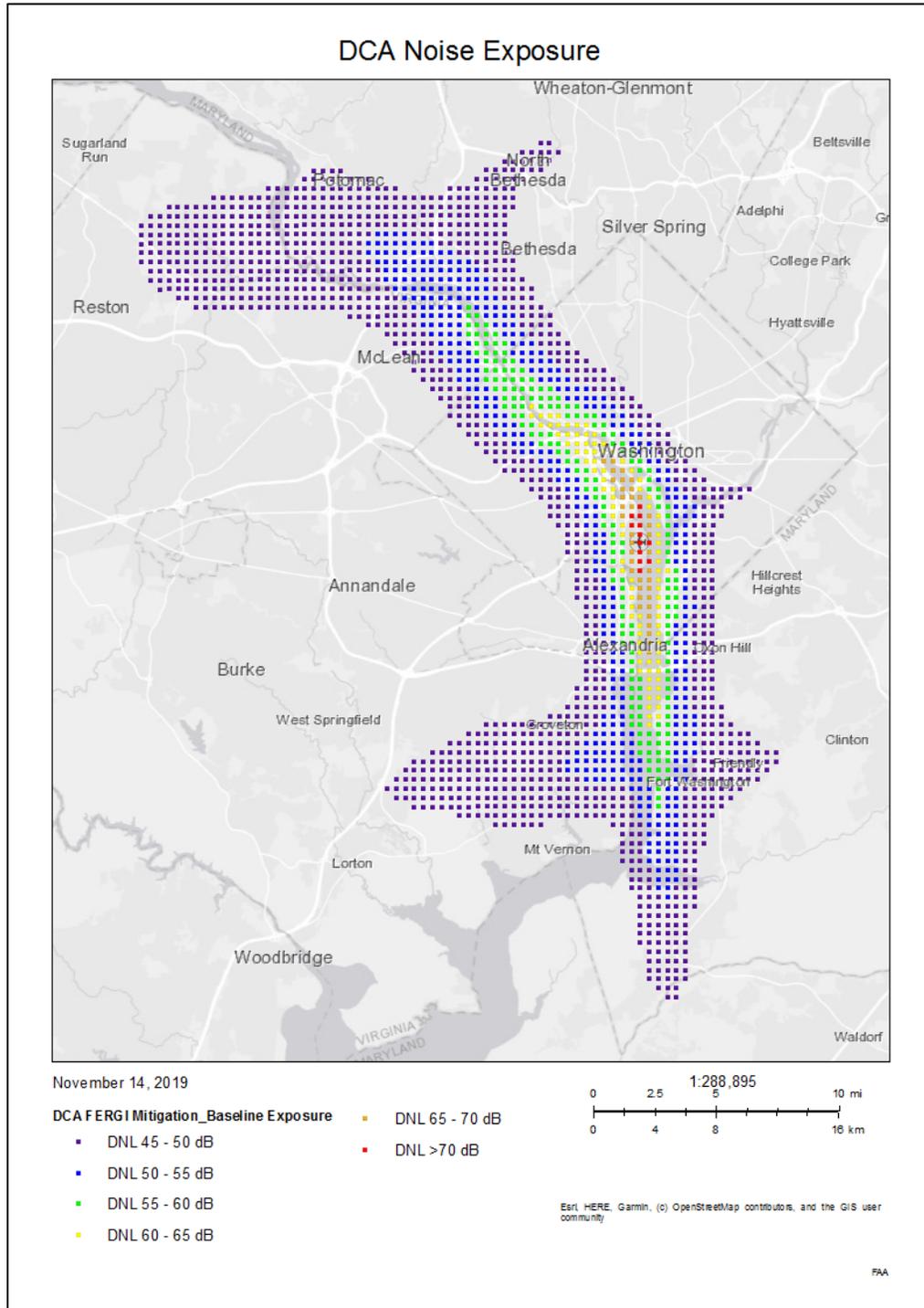


Figure 3-1: Baseline Noise Exposure in TARGETS

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

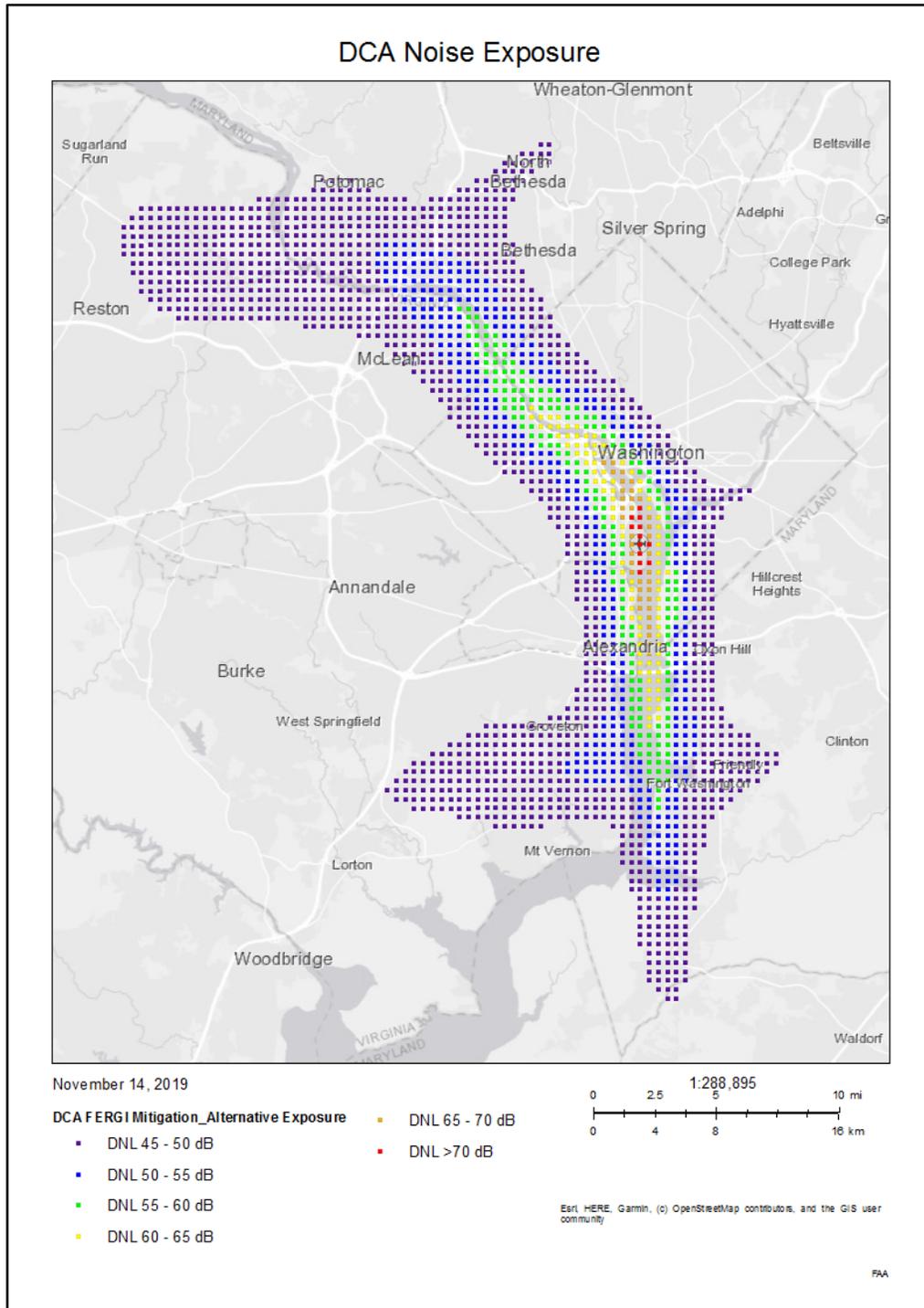


Figure 3-2: Alternative Noise Exposure for the Proposed Procedures in TARGETS

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

2. Noise Impacts

A comparison of the baseline and alternative scenarios by the TARGETS Environmental plug-in determines the noise impacts of the proposed action. Significance of noise impacts is defined by FAA Order 1050.1F¹ which establishes the threshold for significant increases in noise exposure. Where the proposed action results in a noise impact, TARGETS graphically displays a noise impact layer that indicates the locations of reportable and significant changes. When applicable, these impacts are shown overlaying a map view of the area surrounding the airport. In the case of DCA, there was **no reportable or significant increase in noise resulting from the proposed action.**

¹ According to Exhibit 4-1 of FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, a noise impact is significant if “*The action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.*”

Appendix A Random Tracks Used for Analysis

1	7/9/2018
2	7/21/2018
3	7/23/2018
4	7/24/2018
5	7/26/2018
6	8/1/2018
7	8/5/2018
8	8/18/2018
9	8/20/2018
10	8/27/2018
11	8/29/2018
12	8/30/2018
13	9/1/2018
14	9/9/2018
15	9/11/2018
16	9/19/2018
17	10/8/2018
18	10/9/2018
19	10/14/2018
20	10/16/2018
21	10/17/2018
22	10/19/2018
23	10/21/2018
24	10/31/2018
25	11/7/2018
26	11/12/2018
27	12/1/2018
28	12/4/2018
29	12/7/2018
30	12/11/2018

31	12/12/2018
32	12/13/2018
33	12/18/2018
34	12/23/2018
35	12/27/2018
36	12/31/2018
37	1/3/2019
38	1/28/2019
39	1/30/2019
40	2/4/2019
41	2/5/2019
42	2/6/2019
43	2/8/2019
44	2/15/2019
45	2/18/2019
46	2/25/2019
47	3/9/2019
48	3/12/2019
49	3/20/2019
50	3/26/2019
51	3/27/2019
52	3/28/2019
53	4/25/2019
54	4/26/2019
55	4/27/2019
56	5/1/2019
57	5/3/2019
58	5/6/2019
59	5/23/2019
60	5/28/2019

Attachment B: Letter from US Secret Service to the FAA Requesting New Flight ProceduresU.S. Department of Homeland Security
UNITED STATES SECRET SERVICE

Washington, D.C. 20223

August 15, 2018

Mr. Daniel K. Elwell
Acting Administrator
U.S. Department of Transportation
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Dear Mr. Elwell:

I am writing you to discuss flight incursions into the Prohibited Area P-56, District of Columbia. The proximity of Ronald Reagan Washington National Airport (KDCA) to the White House and Naval Observatory, creates a significant security risk for the U.S. Secret Service (Secret Service). Pursuant to Title 18, Section 3056, of the United States Code, the Secret Service is responsible for implementing appropriate security procedures for the President, Vice President, and visiting heads of state. In accordance with these responsibilities, the Secret Service must ensure the security of the airspace above the White House and the Naval Observatory, both of which fall within the Prohibited Area P-56. Over the past few years the Secret Service has observed an increase in flight violations into the Prohibited Area P-56 from aircraft departing and arriving KDCA, resulting in an annual incursion increase of approximately thirty percent. The increased numbers of aircraft violating the Prohibited Area P-56 has caused great concern for the Secret Service.

Pursuant to 14 CFR Part 73 [Airspace Docket No. 98-AWA-4] Change of Using Agency for Prohibited Area P-56, from the Administrator of the Federal Aviation Administration to the Secret Service, I would respectfully request that the Federal Aviation Administration identify and implement new procedures for aircraft operating out of KDCA. The objective of the Secret Service, regarding this request, is to reduce and ultimately eliminate aircraft violations of the Prohibited Area P-56. Each incursion provokes a significant coordinated response from the Department of Defense and numerous federal agencies, including the Secret Service, causing the expenditure of valuable resources while also affecting commercial and other air traffic in the National Capital Region. Additionally, this request will reduce the exposure to potential liability which commercial airlines, air charter companies, and individual pilots face for each incursion.

Thank you for any assistance you can provide with this request. Should you wish to discuss this matter further, please do not hesitate to contact Deputy Assistant Director, Special Operations, James Lewis on 202-406-5452.

Sincerely,

A handwritten signature in blue ink that reads "R.D. Alles".

Randolph D. "Tex" Alles



COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler
Secretary of Natural Resources

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

Section 106 Consultation, Proposal to Publish Amended Air Traffic Procedures at Reagan Nat'l -
Amended waypoint of 9 northbound departure procedures, Arlington County, Virginia

To: Andy Pieroni, FAA
Susan Stafford, FAA
Charles J. Gibson, FAA
Ryan Almasy, FAA

DHR File No. 2020-0196

FAA has made the determination of NO HISTORIC PROPERTIES AFFECTED.

DHR: Concurs

A handwritten signature in blue ink that reads "Adrienne Birge-Wilson".

Adrienne Birge-Wilson, Architectural Historian
Office of Review and Compliance
Virginia Department of Historic Resources

Date



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

April 27, 2020

Ms. Amanda Apple, Preservation Officer
MHT, Project Review and Compliance
100 Community Place
Crownsville, MD 21032

Dear Ms. Apple:

Subject: Updated Project Submittal for the Following Project: Federal Aviation Administration (FAA) Proposal to Amend Air Traffic Procedures at Reagan National Airport - Amendment of Nine Northbound Departure Procedures, *Remove Waypoint FERGI from Six Standard Instrument Departures, Add the SCOOB Enroute Transition to Three Southbound Departure Procedures*

On February 25, 2020, the Federal Aviation Administration (FAA) submitted a project request for the amendment of nine northbound departure procedures, which you reviewed and concurred with a finding of no historic properties affected. See **Attachment A** to view a copy of your response letter. The FAA wishes to supplement its earlier consultation letter by seeking your concurrence on two additional proposed changes to procedures at DCA, which the FAA intends to make at the same time as the nine northbound departure procedures are amended.

First, the FAA is proposing to remove a waypoint named FERGI from six Standard Instrument Departure (SID) procedures, which will reduce the amount of traffic over FERGI and keep aircraft over the Potomac River longer, which is consistent with the recommendations in MWAA's Noise Compatibility Program for Ronald Reagan Washington National Airport (DCA). In addition, this proposed action was unanimously endorsed by the DCA Community Noise Working Group on September 26, 2019. As you may know, the DCA Community Noise Working Group was convened by MWAA and is comprised of representatives from communities affected by DCA aircraft noise. The Working Group makes recommendations to the FAA to address noise concerns.

Second, due to anticipated changes in the North East Corridor routes that transition traffic North and South along the east coast, a high altitude (over 18,000 feet) transition called SCOOB is required. This high altitude change is not expected to change where aircraft are flying or create any noise impacts.

For the first change to FERGI, the FAA is proposing a finding of "No Adverse Effect" on historic properties under 36 C.F.R. 800.5. For the second change, addition of the SCOOB transition, the FAA is proposing a finding of "No Effect" on historic properties under 36 C.F.R. 800.4. Information supporting these proposed findings, including a description of the undertakings and their effects on historic properties and other information required by 36

C.F.R. 800.11 is contained within this correspondence. The FAA respectfully requests your review of the information listed in this document and seeks your concurrence with our determinations.

Project Description

In addition to the adoption of the waypoint REVGE described in the FAA's initial February 25, 2020 consultation letter, the FAA is proposing to remove the waypoint FERGI and add a new waypoint called RGIII. This proposed action will shorten the route by approximately ¼ mile and keep aircraft over the Potomac River longer in an effort to reduce air traffic over of the FERGI waypoint. This change was requested by the DCA Community Noise Working Group and would remove waypoint FERGI from SIDs HORTO, WYNGS, REBLL, CLTCH, SCRAM and JDUBB. For these procedures, the proposed change requires relocation from waypoint BEBLE, FERGI, and MELOE to BEBLE, RGIII, and MELOE. The FAA is also proposing to create a transition to connect the CONLE (connects to BWI), AMEEE (connects to DCA), and JCOBY (connects to Dulles) departure procedures with the SCOOB enroute transition to tie into existing high altitude routes (above 18,000 feet). The SCOOB transition would be added to the aforementioned three procedures which would minimize controller workload and would not be noticeable to the public. **Figures 1 and 2** show these proposed actions.



Figure 1: The blue line represents the current air traffic route and the red line represents the proposed amended route, removing waypoint FERGI and adding the new waypoint RGIII.

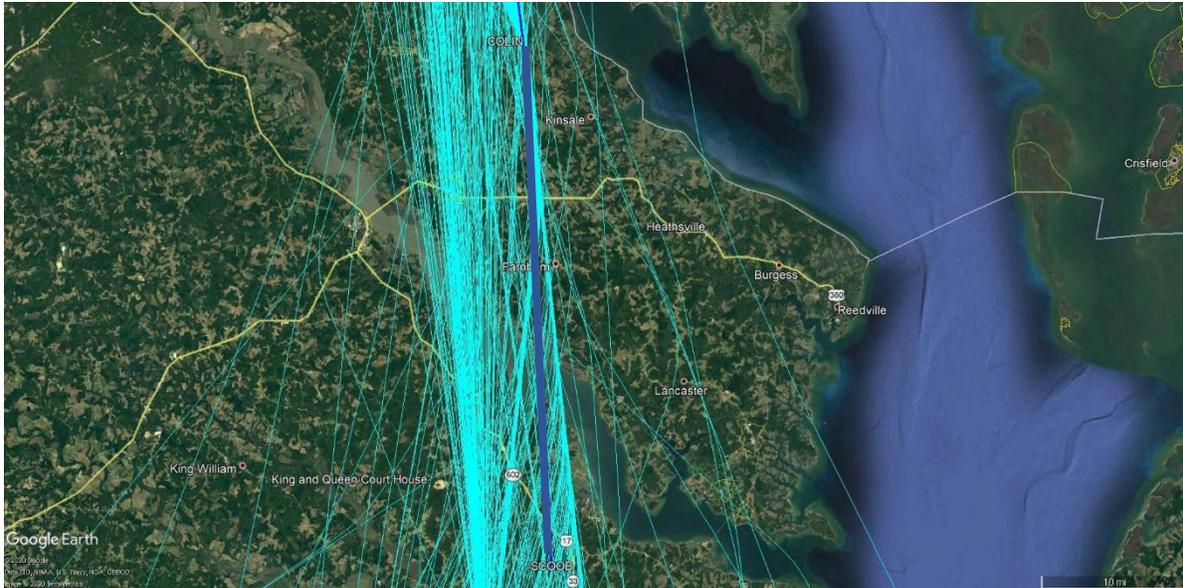


Figure 2: The blue line represents the proposed SCOOB transition. The light blue lines represent radar tracks of aircraft that are already traversing in close proximity to the proposed SCOOB transition.

FAA’s Aviation Environmental Screening Tool (AEDT) was used to conduct noise screening to evaluate whether there would be noise impacts as a result of implementing the proposed amendments. The results of the modeling indicated that there would be no reportable or significant noise impacts. The reportable range is defined as a +/- 3 decibels (dB) increase in the 60-65 Day-Night Average Sound Level (DNL) range and +/-5 dB increase in the 45-60 DNL range. A significant impact by federal standards is an increase of 1.5 dB DNL in an area exposed to 65 dB DNL. **Attachment B** contains the AEDT noise screening analysis report.

Area of Potential Effects

As part of its responsibilities under Section 106, the FAA attempted to identify the Area of Potential Effects for the undertakings described above. The Section 106 regulations define the APE as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” 36 CFR § 800.16(d).

The Proposed Actions will not cause any physical effects. However, pursuant to 36 CFR 800.5(a)(2)(v), the FAA also considered the potential for the undertakings to introduce visual, atmospheric, or audible elements that could diminish the integrity of a historic property's significant historic features. The FAA compared the current flight tracks from aircraft at DCA to the propose changes to the air traffic procedures described above. The comparison is depicted in **Figure 1**. Based on this comparison, the FAA determined that there would be no new areas overflown by the proposed SCOOB transition, and therefore no potential to introduce new visual, atmospheric or audible elements. However, amending SIDs to eliminate FERGI and instead use RGIII is expected to introduce aircraft to areas that are not currently

overflown.¹ Such areas have been identified as part of the Area of Potential Effects depicted in Figure 4.

The FAA also considered the potential for the undertaking to have noise effects that could alter the character or use of historic properties. The FAA conducted a noise screen to determine how these undertakings would affect current aircraft noise exposure levels. This analysis indicated that the undertakings would not result in any noise increase that would be “significant” or “reportable” as defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*. As a result, there was no Area of Potential Effects based on potential noise increases for either of the proposed changes.

In sum, the FAA proposes an Area of Potential Effects (APE) for the area between the waypoints BEBLE-FERGI-MELOE and waypoints BEBLE-RGIII-MELOE based on the potential introduction of visual, atmospheric, or audible elements. Refer to **Figure 3** to view the proposed APE. The FAA conducted a review of the National Historic Register of Historic Places to identify resources within the APE. Based on that review, only the Taylor, David W., Model Basin is contained in the APE. The FAA does not believe there would be an adverse impact to the Basin because the listing criteria of architecture and engineering would not be diminished by the introduction of air traffic.

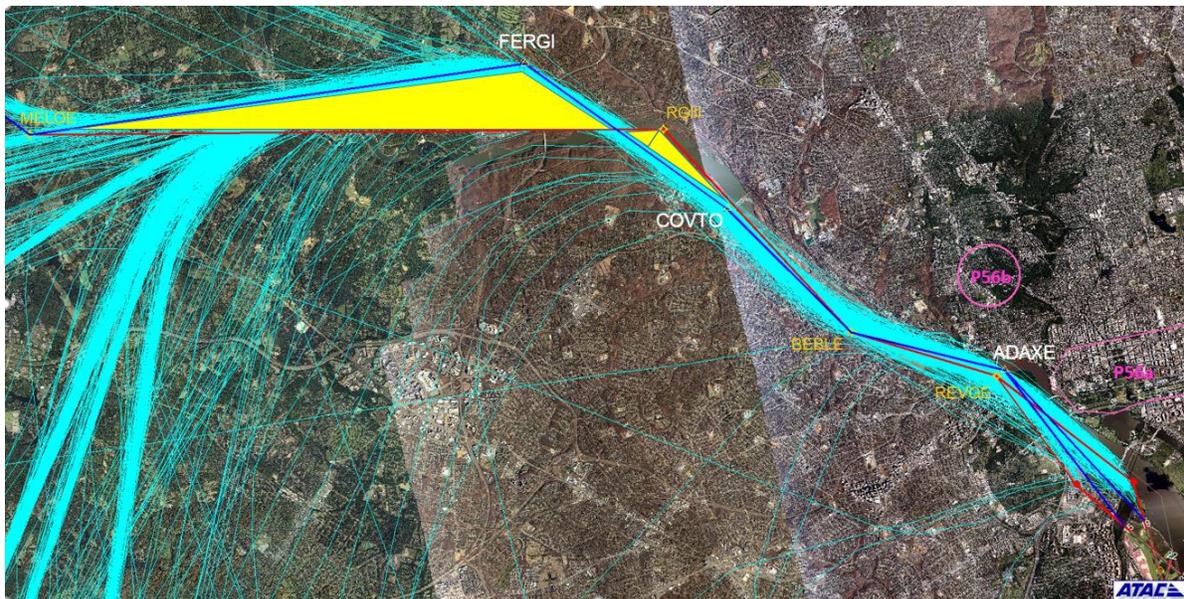


Figure 3. The APE is depicted by the yellow highlighted areas. The blue line is the current route and the red line is the proposed route. Light blue lines are radar tracks for aircraft using the current route.

Request for Concurrence

The FAA requests your review of the information listed within this document, and we seek your concurrence with a finding that the proposed implementation of the SCOOB transitions

¹ Note that while there is expected to be an introduction of aircraft overflights, a small number of aircraft currently overfly the area. Moreover, the existing flight corridor is approximately 3,500 feet north at the furthest point of change and already exposes the area to a degree of audible and visual impacts.

would have “No Effect” on historical or cultural properties and the removal of FERGI and replacement with RGIII would have no adverse effect on historic properties. If you desire to provide comments, concurrence, or objection to the FAA’s proposed findings, please provide them by letter or email within 30 days.

Thank you for your review of this project,

Andrew Pieroni

Andy Pieroni, Environmental Protection Specialist
Eastern Service Center - Operations Support Group, AJV-E250 1701 Columbia Avenue
College Park, GA 30337
(404) 305-5586 (tel)
E-mail address: andrew.pieroni@faa.gov

Cc: Virginia Department of Historic Resources, Fairfax County Heritage Conservation,
Montgomery Parks

ATTACHMENTS

Attachment A: Finding of No Adverse Impact Letter Amendment of Nine DCA Aircraft Departures

202001365



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



F
FAA
EJR

February 25, 2020

Ms. Amanda Apple, Preservation Officer
MHT, Project Review and Compliance
100 Community Place
Crownsville, MD 21032

Dear Ms. Apple:

Subject: Federal Aviation Administration (FAA) Proposal to Publish Amended Air Traffic Procedures at Reagan National Airport – Amended waypoint of nine northbound Departure Procedures

MD

The Federal Aviation Administration (FAA) is conducting an environmental review to consider the potential environmental impacts for the amendment of a waypoint used by nine departure procedures serving Ronald Reagan Washington National Airport (DCA) in Arlington County, Virginia (Proposed Action). The FAA has determined that the Proposed Action is an undertaking subject to Section 106 of the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. § 470 et seq.) and its implementing regulations at 35 C.F.R. Part 800. This letter presents the FAA’s review of whether the project has an Area of Potential Effects and the FAA’s determination that no historic properties would be affected by the undertaking, pursuant to 36 C.F.R. 800.4(d)(1). Information supporting this finding, including a description of the undertaking and the FAA’s review of whether this project will affect historic properties and other information required by 36 C.F.R. 800.11(d) is contained within this correspondence.

The FAA respectfully requests your review of the information listed in this document and seeks your concurrence with our determination that the amended waypoint to departure procedures at DCA would not affect historic properties. As explained in greater detail below, the FAA has not designated an Area of Potential Effect (APE) because, as demonstrated by Figure 2, the Proposed Action is not expected to expand the flight corridor flown by current aircraft. As a result, the Proposed Action will not introduce any visual, atmospheric, or audible elements to new areas. In addition, the FAA’s noise screen for the Proposed Action, enclosed with this letter, concludes that the Proposed Action will not cause any reportable¹ or significant² noise impacts. Refer to **Attachment A** to review the Noise Screening Report.

¹ Under FAA policy, an increase in the Day-Night Average Sound Level (DNL) of 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, is significant. FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, Exhibit 4-1. DNL is the 24-hour average sound level, in decibels, for the period from midnight to midnight, obtained after the addition of ten decibels to sound levels for the periods between midnight and 7 a.m., and between 10 p.m., and midnight, local time.

² Under FAA policy, noise increases are “reportable” if the DNL increases by 5 dB or more within areas exposed to DNL 45-60 dB, or by 3 dB or more within areas exposed to DNL 60-65 dB. FAA Order 1050.1F, Appendix B, section B-1.4.

418 AC 3/17/2020

Project Description

On January 30, 2020, the FAA began conducting a temporary air traffic test to move a waypoint, ADAXE, 784 feet to the southwest, and rename that waypoint REVGE as part of the publication of a new departure procedure called HOLT B. **Note: Departure procedures such as HOLT B are a series of waypoints that aircraft fly by in order to route aircraft in a safe and efficient manner.** The temporary procedure has been used by approximately ten percent of north-flow departures at DCA since its implementation, which allows the FAA to compare the impact of using waypoint ADAXE to waypoint REVGE.

The purpose of the temporary HOLT B procedure and the FAA's Proposed Action is to enhance national security. The Proposed Action was developed because of a longstanding concern from the United States Secret Service caused by airlines penetrating the Prohibited Area P-56, which protects a portion of the National Mall in Washington, D.C. and the White House. Since 2012, over 300 incursions have occurred, which resulted in the U.S. Secret Service requesting that the FAA Administrator identify and implement changes for aircraft operating out of DCA to reduce aircraft violations of the Prohibited Area P-56. **Attachment B** contains a copy of the letter from the U.S. Secret Service to the FAA. In consultation with the Secret Service, the FAA identified amending the REVGE waypoint as a way to move aircraft away from P-56 while still flying over the Potomac River, which is consistent with longstanding community requests to manage aircraft noise from DCA. The FAA's Aviation Environmental Screening Tool (AEDT) was used to conduct noise screening to evaluate whether there would be noise impacts as a result of implementing the amended waypoint for all north-flow departure procedures at DCA. The results of the modeling, contained in Attachment A, indicated that there would be no reportable or significant noise impacts.

As noted above, the FAA published the temporary HOLT B procedure on January 30, 2020, to temporarily evaluate the effectiveness of the REVGE amendment and to ensure pilots and their planes could fly the procedure as designed by the FAA. **Figure 1** contains a depiction of the proposed amended procedure. Based on the initial results of the HOLT B, which indicates the amended waypoint meets the purpose and need of reducing incursions into P-56, the FAA is proposing to permanently implement the HOLT B as well as amend the remaining existing north-flow departure procedures at DCA so that all aircraft follow the new REVGE waypoint. Indeed, Figure 2 demonstrates that the use of the REVGE waypoint moves aircraft away from P-56 while still keeping them within the current corridor of flight tracks from aircraft using the ADAXE waypoint. As a result, the FAA is not introducing aircraft into any new areas, and aircraft will continue to fly over the Potomac River. As part of the FAA's environmental review for the Proposed Action, the FAA is engaging with your office pursuant to Section 106 of the National Historic Preservation Act.

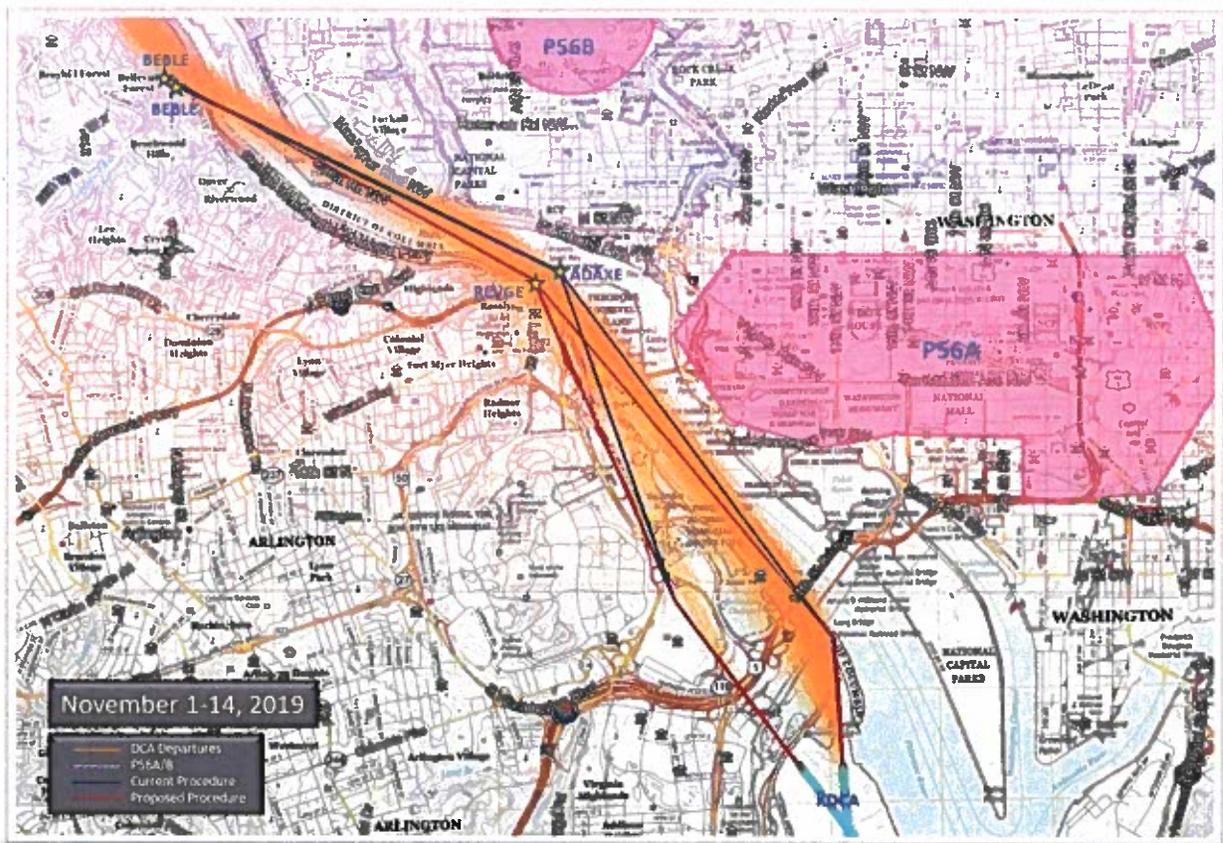


Figure 1. Original and proposed amended procedure, original procedure (blue lines) and proposed procedure (red lines). The orange shading represents radar tracks depicting aircraft location from November 1-14, 2019.

Area of Potential Effects

As part of its responsibilities under Section 106, the FAA attempted to identify the Area of Potential Effects for the undertaking. The Section 106 regulations define the APE as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” 36 CFR § 800.16(d).

The Proposed Action will not cause any physical effects. However, pursuant to 36 CFR 800.5(a)(2)(v), the FAA also considered the potential for the undertaking to introduce visual, atmospheric, or audible elements that could diminish the integrity of a historic property's significant historic features. The FAA compared the flight tracks of aircraft flying the REVGE waypoint to those still using the ADAXE waypoint. The comparison is depicted in Figure 2. Based on this comparison, the FAA determined that there would be no new areas overflowed by the Proposed Action, and therefore no potential to introduce new visual, atmospheric or audible elements.

The FAA also considered the potential for the undertaking to have noise effects that could alter the character or use of historic properties. The FAA conducted a noise screen to determine how this undertaking would affect current aircraft noise exposure levels. This analysis indicated that the undertaking would not result in any noise increase that would be “significant” or “reportable” as defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.

In sum, after careful evaluation of aircraft radar tracks for the proposed action compared to the no action alternative, the FAA determined that the outer boundaries of the flight corridor did not expand when aircraft used the new REVGE waypoint. Refer to **Figure 2** to view the comparison of radar flight tracks from February 6-11, 2020. Additionally, the FAA's noise screening tool AEDT did not indicate any measurable change in noise level (no reportable or significant noise increase). Refer to **Attachment A** to review the AEDT noise screening analysis report. Based on the FAA's determination that this undertaking does not have an Area of Potential Effects, the FAA is proposing a finding of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).

KDCA All Departures – Feb 6 – Feb11, 2020 – 2356 Tracks

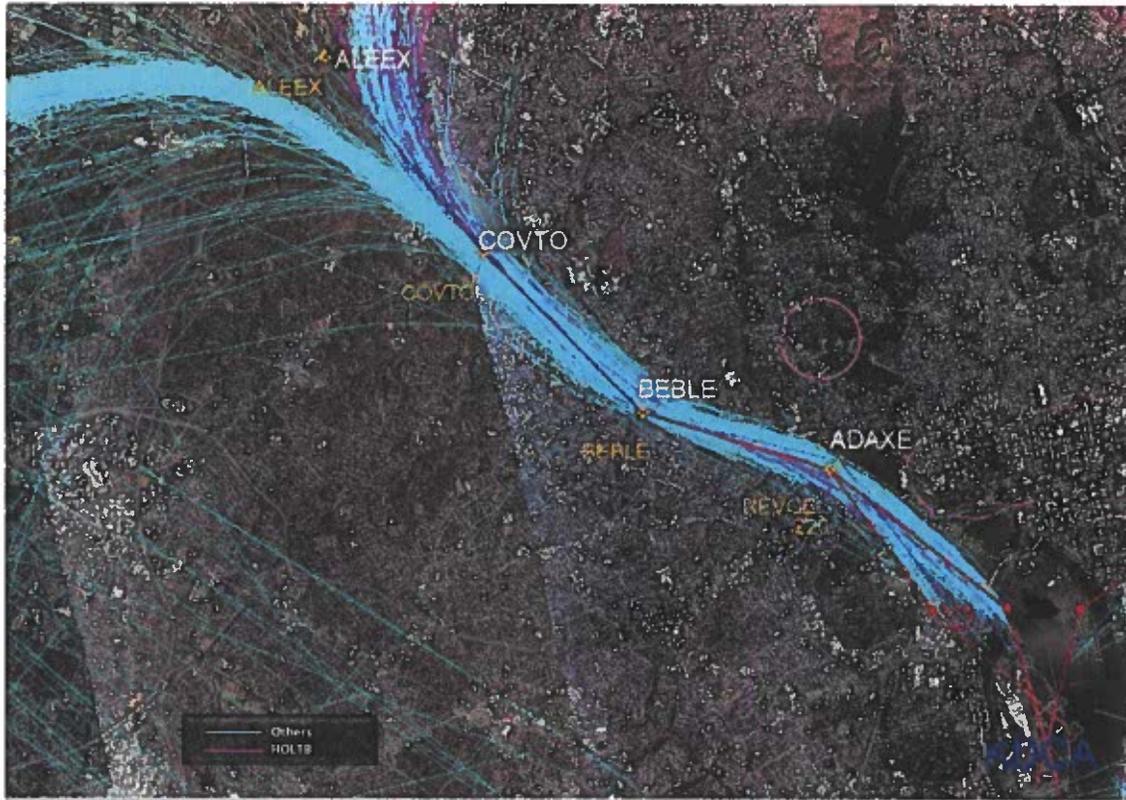


Figure 2. No action alternative flight radar tracks (light blue) versus the proposed action flight radar tracks (magenta) for the period February 6 - February 11, 2020.

Request for Concurrence

The FAA requests your review of the information listed within this document, and we seek your concurrence with the FAA's finding pursuant to 36 CFR 800.4(d)(1) that no historic properties would be affected by the amended waypoint to north-flow departure procedures at DCA. As set forth in 36 CFR 800.4(d)(1)(i), any objections must be filed within 30 days receipt of the FAA's finding. If you desire to provide comments or objections, please provide them by letter or email within 30 days to the undersigned at the following address:

Andy Pieroni, Environmental Protection Specialist
 Eastern Service Center - Operations Support Group, AJV-E250
 1701 Columbia Avenue
 College Park, GA 30337
 (404) 305-5586 (tel)
 (404)-305-5572 (fax)
 E-mail address for questions: andrew.pieroni@faa.gov

The FAA would like to thank you for your interest in this project. If you have any questions about the information provided, please feel free to contact me at 404-305-5571.

Sincerely,

Charles J Gibson

For
 Ryan Almasy
 Manager, Operations Support Group, AJV-E200
 Eastern Service Center
 Federal Aviation Administration

⊗

The Maryland Historical Trust has determined that there are no historic properties affected by this undertaking.

Beth Cole *3/18/2020*
 _____ Date _____

⊗

We concur with FAA's determination based on the information provided. Should there be substantive changes to the proposed action, we would await further consultation with FAA as appropriate pursuant to Section 106 of NHPA.

Attachment B: Noise Screening Report

Noise Screening Analysis Report

For

Ronald Reagan Washington National Airport

KDCA

Washington, DC

Prepared by:

ATO, AJV-114, Environmental Policy Team

Tuesday, April 07, 2020

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Summary

Noise analysis was completed to assess potential impacts resulting from proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC, using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Historical radar track data was used to create a baseline scenario. After the baseline scenario was built, aircraft operations assigned to the proposed procedure were modeled as flying the proposed procedure, which provides the alternative scenario. Selections for track assignments were made based on historical flight paths, and RNAV capable aircraft were assigned to the procedure nearest to their historical tracks in the alternative scenario.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. In the case of DCA, there was no significant or reportable increase in noise resulting from the proposed action.

Purpose

The purpose of this report is to document the process used to analyze the noise impact of proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC and to present the results of that analysis. The analysis of the instrument flight procedures at DCA was performed using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Figure 1 shows the airport diagram for DCA, which provides the runway layout and the airport's field elevation. Table 1 shows the procedure name, type and publication date. Figures depicting the procedure changes are shown in Appendix A.

Table 1: Proposed Procedures Modeled for DCA

Procedure Name	Procedure Type
AMEEE ONE	RNAV SID
CLTCH TWO	RNAV SID
DOCTR FIVE	RNAV SID
HORTO THREE	RNAV SID
JDUBB TWO	RNAV SID
REBLL FOUR	RNAV SID
SCRAM FOUR	RNAV SID
SOOKI FIVE	RNAV SID
WYNGS FOUR	RNAV SID

Methods

Noise screening was completed using the TARGETS Environmental Plug-in tool to calculate Day-Night Average Sound Levels (DNL) from existing operations (baseline) and modeled operations to replicate the proposed action (alternative). Historical radar track data for DCA was obtained from the Performance Data Analysis and Reporting System (PDARS). After concurrence of the dates to be used by the environmental specialist and air traffic facility, 60 days of random radar track data were selected for the DCA analysis representing a range of temperature and wind conditions as well as being representative of the average runway usage. A list of the tracks selected for analysis are shown in Appendix B.

After the removal of overflights, incomplete track segments, and other unusable tracks, 24,743 tracks were used for the analysis. The altitude of the historical tracks was considered and a range ring was set to contain the area where most of the tracks reached above 10,000 feet Above Field Elevation (AFE). This established the study area and the tracks outside of the study area were removed from the analysis. In the case of DCA, the study area is a circle with a radius of 40 nautical miles (nm) centered over the airport.

The randomly selected dates are presumed to represent average traffic counts and traffic flows through various seasons and peak travel times for DCA. There were no significant runway outages or significant conditions that would otherwise result in abnormal traffic counts or traffic flows. In order to calculate the Average Annual Day (AAD) impacts, traffic counts for average daily departures and arrivals used for annualization in this analysis were obtained through the FAA's AFS Data Analytics Runway Usage Module.

Historical radar track data was used to create a baseline noise exposure, which provides lateral path definition, aircraft fleet mix, departure/arrival stream proportions for each runway, and day/night traffic ratios. The alternative scenario was built by taking aircraft operations and assigning them to the proposed procedure instead of their historical tracks. RNAV capable aircraft were assigned to the procedure based on their historical tracks, proximity to other procedures, and any additional usage information from the Environmental Specialist. In the case of DCA, all operations departing from runways 01 and 03 were assigned to a proposed procedure.

The analysis does not take into account terrain. All calculations were made in reference to the airport's field elevation. The altitude controls were based on AEDT standard aircraft profiles. With respect to lateral distribution, a 0.5 nm dispersion for RNAV procedures was used and a 0.3 nm dispersion for RNP procedures was used based standard methods for noise screening. For tracks near the runway where dispersion is normally less than 0.3 nm, dispersion was based on historical track data.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. The Environmental Plug-in Tool uses the Aviation Environmental Design Tool to calculate noise. The noise output files from AEDT for both the baseline and alternative noise exposures consist of a series of equally spaced grid points, each showing the DNL value. The noise grid (receptor set) is a square grid extending 30 nm in each direction of the airport with grid points (receptors) spaced 0.25 nm apart. The noise results of the baseline and alternative scenarios were then compared to test for potential noise impacts.

The noise impact is a comparison between the baseline and the alternative noise exposure that depicts reportable and significant noise changes at all affected locations per the criteria indicated in FAA Order 1050.1F and Chapter 32 of FAA Order 7400.2K. The reportable and significant noise increases and decreases (if any) are then depicted on an aerial map.

Results

1. Noise Exposure

The baseline and alternative noise exposure is shown in Figure 3-1 and Figure 3-2, which depicts the levels and locations of the noise produced by the historical radar track data for arrivals and departures.

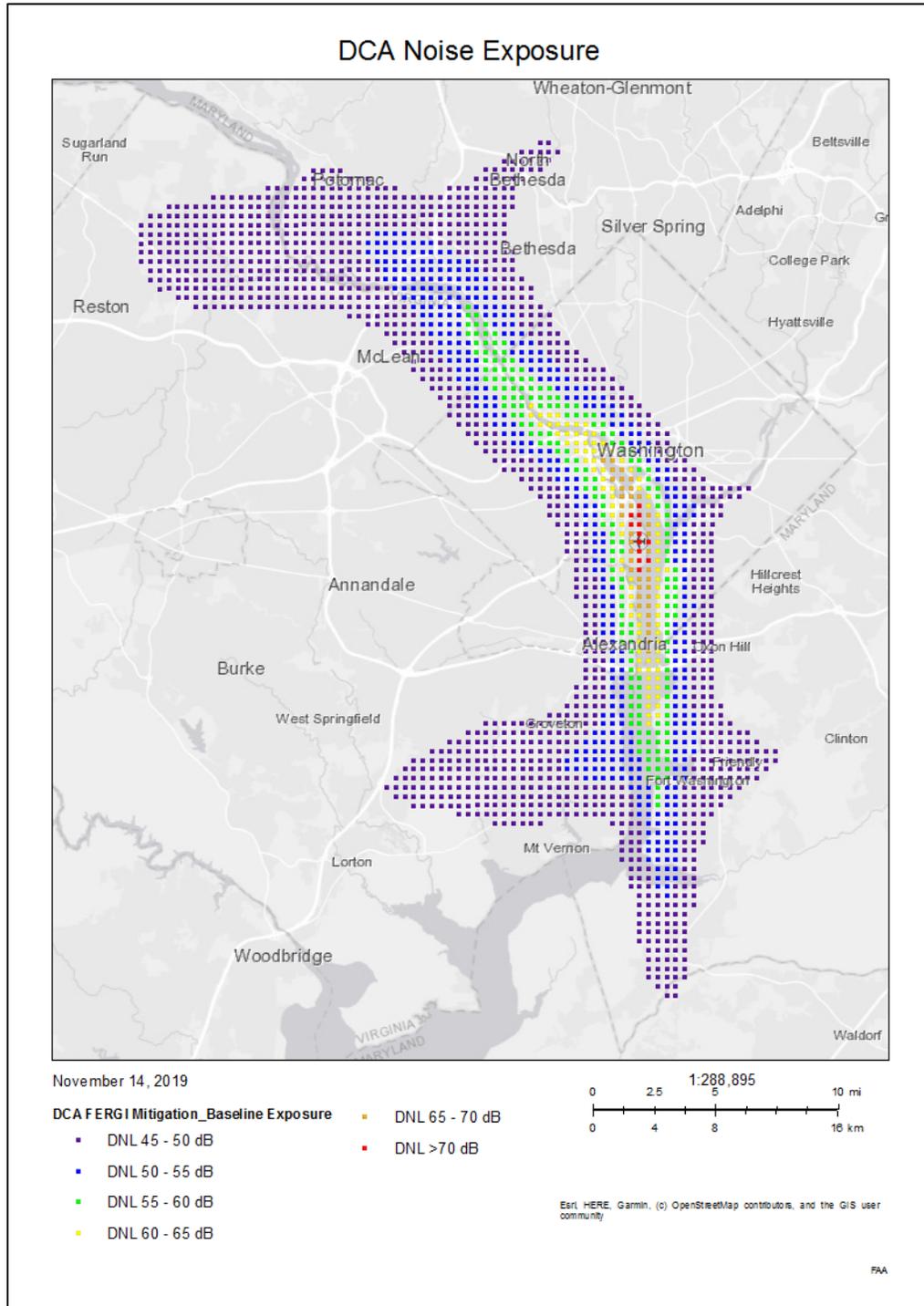


Figure 3-1: Baseline Noise Exposure in TARGETS

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

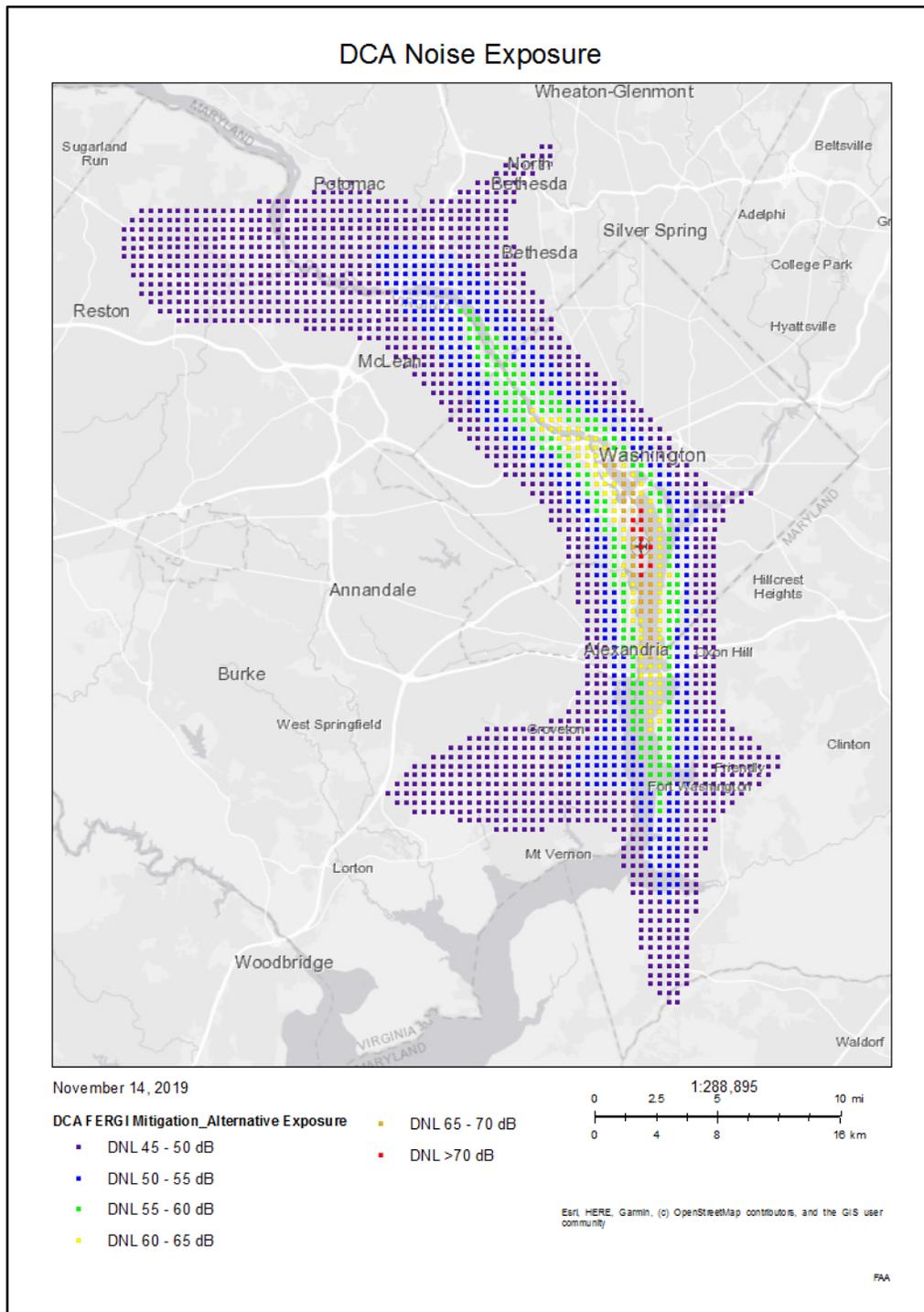


Figure 3-2: Alternative Noise Exposure for the Proposed Procedures in TARGETS

DCA Noise Screening Analysis Report *For Official Internal Use Only*

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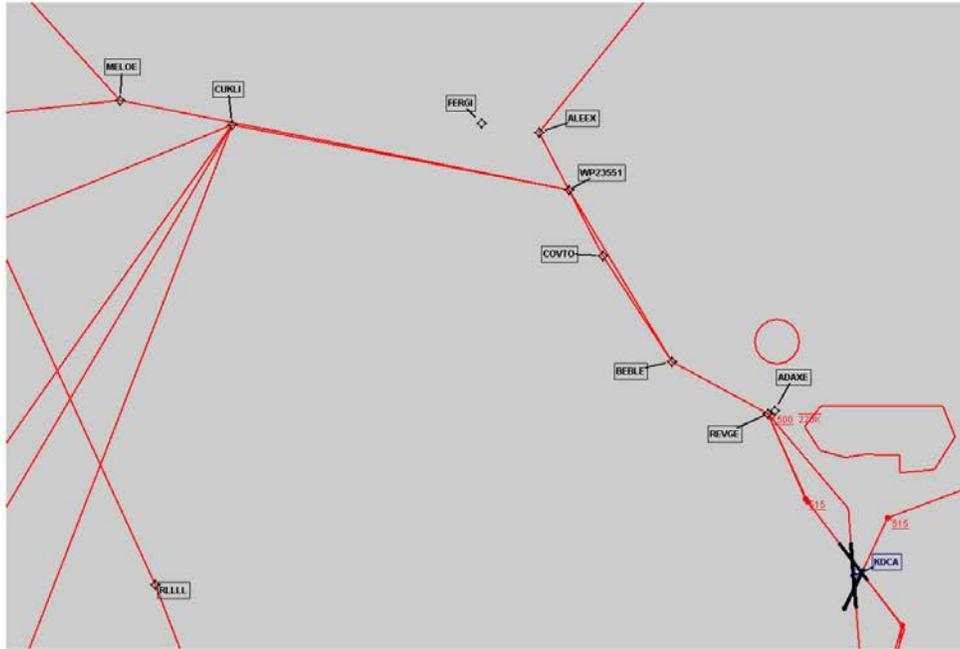
2. Noise Impacts

A comparison of the baseline and alternative scenarios by the TARGETS Environmental plug-in determines the noise impacts of the proposed action. Significance of noise impacts is defined by FAA Order 1050.1F¹ which establishes the threshold for significant increases in noise exposure. Where the proposed action results in a noise impact, TARGETS graphically displays a noise impact layer that indicates the locations of reportable and significant changes. When applicable, these impacts are shown overlaying a map view of the area surrounding the airport. In the case of DCA, there was **no significant increase in noise resulting from the proposed action.**

¹ According to Exhibit 4-1 of FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, a noise impact is significant if “*The action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.*”

Appendix A Proposed Changes to DCA SIDS

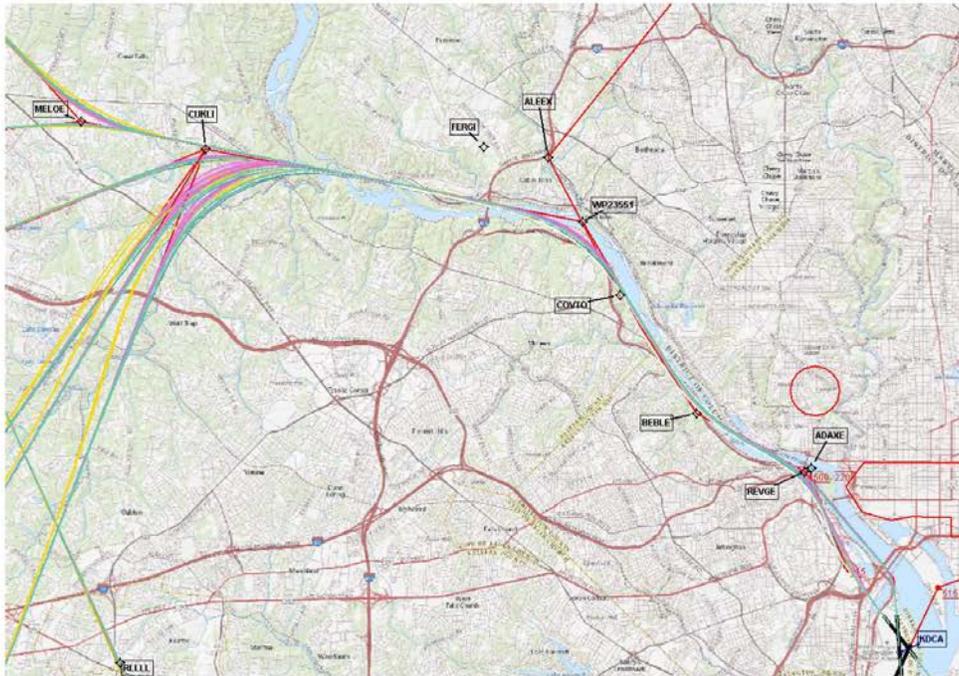
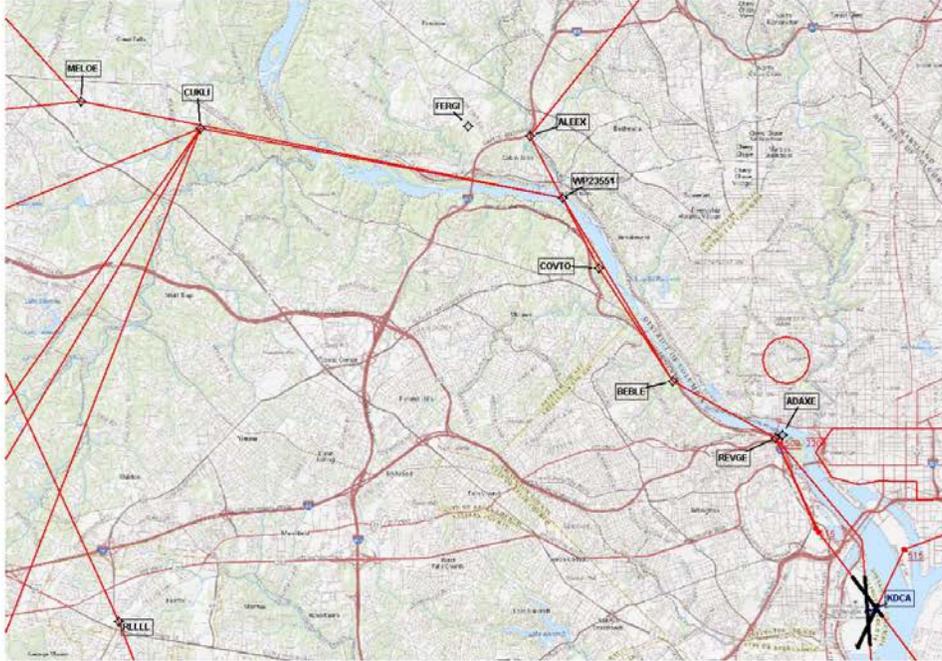
DCA SIDS - ALTERNATIVE ROUTE FROM BEBLE TO CUKLI/MELOE



DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

DCA SIDS - ALTERNATIVE ROUTE FROM BEBLE TO CUKLI/MELOE



DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Appendix B Random Tracks Used for Analysis

1	7/9/2018
2	7/21/2018
3	7/23/2018
4	7/24/2018
5	7/26/2018
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20	10/16/2018
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23	10/21/2018
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45	2/18/2019
46	2/25/2019
47	3/9/2019
48	3/12/2019
49	3/20/2019
50	3/26/2019
51	3/27/2019
52	3/28/2019
53	4/25/2019
54	4/26/2019
55	4/27/2019
56	5/1/2019
57	5/3/2019
58	5/6/2019
59	5/23/2019
60	5/28/2019



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

202002174



F
FAA
ETZ

April 27, 2020

Ms. Amanda Apple, Preservation Officer
MHT, Project Review and Compliance
100 Community Place
Crownsville, MD 21032

Dear Ms. Apple:

Subject: Updated Project Submittal for the Following Project: Federal Aviation Administration (FAA) Proposal to Amend Air Traffic Procedures at Reagan National Airport - Amendment of Nine Northbound Departure Procedures, Remove Waypoint FERGI from Six Standard Instrument Departures, Add the SCOOB Enroute Transition to Three Southbound Departure Procedures

On February 25, 2020, the Federal Aviation Administration (FAA) submitted a project request for the amendment of nine northbound departure procedures, which you reviewed and concurred with a finding of no historic properties affected. See **Attachment A** to view a copy of your response letter. The FAA wishes to supplement its earlier consultation letter by seeking your concurrence on two additional proposed changes to procedures at DCA, which the FAA intends to make at the same time as the nine northbound departure procedures are amended.

First, the FAA is proposing to remove a waypoint named FERGI from six Standard Instrument Departure (SID) procedures, which will reduce the amount of traffic over FERGI and keep aircraft over the Potomac River longer, which is consistent with the recommendations in MWAA's Noise Compatibility Program for Ronald Reagan Washington National Airport (DCA). In addition, this proposed action was unanimously endorsed by the DCA Community Noise Working Group on September 26, 2019. As you may know, the DCA Community Noise Working Group was convened by MWAA and is comprised of representatives from communities affected by DCA aircraft noise. The Working Group makes recommendations to the FAA to address noise concerns.

Second, due to anticipated changes in the North East Corridor routes that transition traffic North and South along the east coast, a high altitude (over 18,000 feet) transition called SCOOB is required. This high altitude change is not expected to change where aircraft are flying or create any noise impacts.

For the first change to FERGI, the FAA is proposing a finding of "No Adverse Effect" on historic properties under 36 C.F.R. 800.5. For the second change, addition of the SCOOB transition, the FAA is proposing a finding of "No Effect" on historic properties under 36 C.F.R. 800.4. Information supporting these proposed findings, including a description of the undertakings and their effects on historic properties and other information required by 36

#2NA BC 5/8/2020

C.F.R. 800.11 is contained within this correspondence. The FAA respectfully requests your review of the information listed in this document and seeks your concurrence with our determinations.

Project Description

In addition to the adoption of the waypoint REVGE described in the FAA's initial February 25, 2020 consultation letter, the FAA is proposing to remove the waypoint FERGI and add a new waypoint called RGIH. This proposed action will shorten the route by approximately ¼ mile and keep aircraft over the Potomac River longer in an effort to reduce air traffic over of the FERGI waypoint. This change was requested by the DCA Community Noise Working Group and would remove waypoint FERGI from SIDs HORTO, WYNGS, REBLL, CLTCH, SCRAM and JDUBB. For these procedures, the proposed change requires relocation from waypoint BEBLE, FERGI, and MELOE to BEBLE, RGIH, and MELOE. The FAA is also proposing to create a transition to connect the CONLE (connects to BWI), AMEEE (connects to DCA), and JCOBY (connects to Dulles) departure procedures with the SCOOB enroute transition to tie into existing high altitude routes (above 18,000 feet). The SCOOB transition would be added to the aforementioned three procedures which would minimize controller workload and would not be noticeable to the public. **Figures 1 and 2** show these proposed actions.

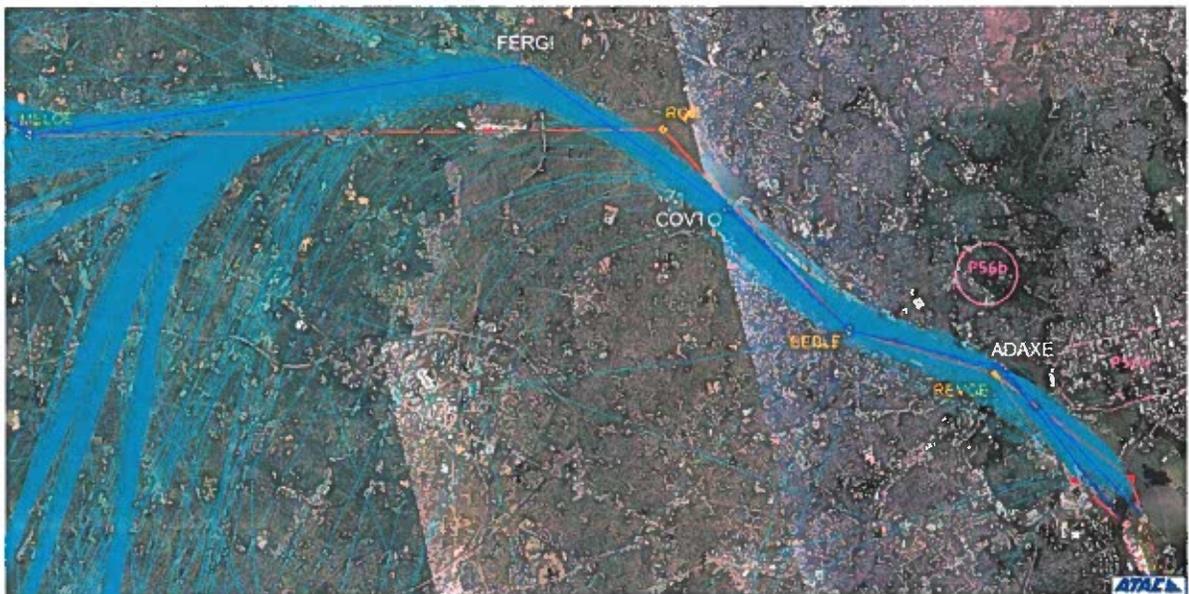


Figure 1: The blue line represents the current air traffic route and the red line represents the proposed amended route, removing waypoint FERGI and adding the new waypoint RGIH.



Figure 2: The blue line represents the proposed SCOOB transition. The light blue lines represent radar tracks of aircraft that are already traversing in close proximity to the proposed SCOOB transition.

FAA’s Aviation Environmental Screening Tool (AEDT) was used to conduct noise screening to evaluate whether there would be noise impacts as a result of implementing the proposed amendments. The results of the modeling indicated that there would be no reportable or significant noise impacts. The reportable range is defined as a +/- 3 decibels (dB) increase in the 60-65 Day-Night Average Sound Level (DNL) range and +/-5 dB increase in the 45-60 DNL range. A significant impact by federal standards is an increase of 1.5 dB DNL in an area exposed to 65 dB DNL. **Attachment B** contains the AEDT noise screening analysis report.

Area of Potential Effects

As part of its responsibilities under Section 106, the FAA attempted to identify the Area of Potential Effects for the undertakings described above. The Section 106 regulations define the APE as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” 36 CFR § 800.16(d).

The Proposed Actions will not cause any physical effects. However, pursuant to 36 CFR 800.5(a)(2)(v), the FAA also considered the potential for the undertakings to introduce visual, atmospheric, or audible elements that could diminish the integrity of a historic property’s significant historic features. The FAA compared the current flight tracks from aircraft at DCA to the propose changes to the air traffic procedures described above. The comparison is depicted in **Figure 1**. Based on this comparison, the FAA determined that there would be no new areas overflowed by the proposed SCOOB transition, and therefore no potential to introduce new visual, atmospheric or audible elements. However, amending SIDs to eliminate FERGI and instead use RGIII is expected to introduce aircraft to areas that are not currently

overflow.¹ Such areas have been identified as part of the Area of Potential Effects depicted in Figure 4.

The FAA also considered the potential for the undertaking to have noise effects that could alter the character or use of historic properties. The FAA conducted a noise screen to determine how these undertakings would affect current aircraft noise exposure levels. This analysis indicated that the undertakings would not result in any noise increase that would be “significant” or “reportable” as defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*. As a result, there was no Area of Potential Effects based on potential noise increases for either of the proposed changes.

In sum, the FAA proposes an Area of Potential Effects (APE) for the area between the waypoints BEBLE-FERGI-MELOE and waypoints BEBLE-RGIII-MELOE based on the potential introduction of visual, atmospheric, or audible elements. Refer to **Figure 3** to view the proposed APE. The FAA conducted a review of the National Historic Register of Historic Places to identify resources within the APE. Based on that review, only the Taylor, David W., Model Basin is contained in the APE. The FAA does not believe there would be an adverse impact to the Basin because the listing criteria of architecture and engineering would not be diminished by the introduction of air traffic.



Figure 3. The APE is depicted by the yellow highlighted areas. The blue line is the current route and the red line is the proposed route. Light blue lines are radar tracks for aircraft using the current route.

Request for Concurrence

The FAA requests your review of the information listed within this document, and we seek your concurrence with a finding that the proposed implementation of the SCOOB transitions

¹ Note that while there is expected to be an introduction of aircraft overflights, a small number of aircraft currently overfly the area. Moreover, the existing flight corridor is approximately 3,500 feet north at the furthest point of change and already exposes the area to a degree of audible and visual impacts.

would have "No Effect" on historical or cultural properties and the removal of FERGI and replacement with RGIII would have no adverse effect on historic properties. If you desire to provide comments, concurrence, or objection to the FAA's proposed findings, please provide them by letter or email within 30 days.

Thank you for your review of this project,

Andrew Pieroni

Andy Pieroni, Environmental Protection Specialist
Eastern Service Center - Operations Support Group, AJV-E250 1701 Columbia Avenue
College Park, GA 30337
(404) 305-5586 (tel)
E-mail address: andrew.pieroni@faa.gov

Cc: Virginia Department of Historic Resources, Fairfax County Heritage Conservation,
Montgomery Parks

SC00B :

FERGI + RG III

The Maryland Historical Trust has determined that there are no historic properties affected by this undertaking.

Beth Cole

5/8/2020
Date

The Maryland Historical Trust has determined that this undertaking will have no adverse effect on historic properties.

Beth Cole

5/8/2020
Date

ATTACHMENTS

Attachment A: Finding of No Adverse Impact Letter Amendment of Nine DCA Aircraft Departures





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

April 28, 2020

Ms. Julie Langan
Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Dear Ms. Langan:

Subject: Updated Project Submittal for the Following Project: Federal Aviation Administration (FAA) Proposal to Amend Air Traffic Procedures at Reagan National Airport - Amendment of Nine Northbound Departure Procedures, *Remove Waypoint FERGI from Six Standard Instrument Departures, Add the SCOOB Enroute Transition to Three Southbound Departure Procedures*

On February 25, 2020, the Federal Aviation Administration (FAA) submitted a project request for the amendment of nine northbound departure procedures, which you reviewed and concurred with a finding of no historic properties affected. See **Attachment A** to view a copy of your response letter. The FAA wishes to supplement its earlier consultation letter by seeking your concurrence on two additional proposed changes to procedures at DCA, which the FAA intends to make at the same time as the nine northbound departure procedures are amended.

First, the FAA is proposing to remove a waypoint named FERGI from six Standard Instrument Departure (SID) procedures, which will reduce the amount of traffic over FERGI and keep aircraft over the Potomac River longer, which is consistent with the recommendations in MWAA's Noise Compatibility Program for Ronald Reagan Washington National Airport (DCA). In addition, this proposed action was unanimously endorsed by the DCA Community Noise Working Group on September 26, 2019. As you may know, the DCA Community Noise Working Group was convened by MWAA and is comprised of representatives from communities affected by DCA aircraft noise. The Working Group makes recommendations to the FAA to address noise concerns.

Second, due to anticipated changes in the North East Corridor routes that transition traffic North and South along the east coast, a high altitude (over 18,000 feet) transition called SCOOB is required. This high altitude change is not expected to change where aircraft are flying or create any noise impacts.

For the first change to FERGI, the FAA is proposing a finding of "No Historic Properties Affected" under 36 C.F.R. 800.5. For the second change, addition of the SCOOB transition, the FAA is proposing a finding of "No Effect" on historic properties under 36 C.F.R. 800.4. Information supporting these proposed findings, including a description of the undertakings and their effects on historic properties and other information required by 36

C.F.R. 800.11 is contained within this correspondence. The FAA respectfully requests your review of the information listed in this document and seeks your concurrence with our determinations.

Project Description

In addition to the adoption of the waypoint REVGE described in the FAA's initial February 25, 2020 consultation letter, the FAA is proposing to remove the waypoint FERGI and add a new waypoint called RGIII. This proposed action will shorten the route by approximately ¼ mile and keep aircraft over the Potomac River longer in an effort to reduce air traffic over of the FERGI waypoint. This change was requested by the DCA Community Noise Working Group and would remove waypoint FERGI from SIDs HORTO, WYNGS, REBLL, CLTCH, SCRAM and JDUBB. For these procedures, the proposed change requires relocation from waypoint BEBLE, FERGI, and MELOE to BEBLE, RGIII, and MELOE. The FAA is also proposing to create a transition to connect the CONLE (connects to BWI), AMEEE (connects to DCA), and JCOBY (connects to Dulles) departure procedures with the SCOOB enroute transition to tie into existing high altitude routes (above 18,000 feet). The SCOOB transition would be added to the aforementioned three procedures which would minimize controller workload and would not be noticeable to the public. **Figures 1 and 2** show these proposed actions.



Figure 1: The blue line represents the current air traffic route and the red line represents the proposed amended route, removing waypoint FERGI and adding the new waypoint RGIII.

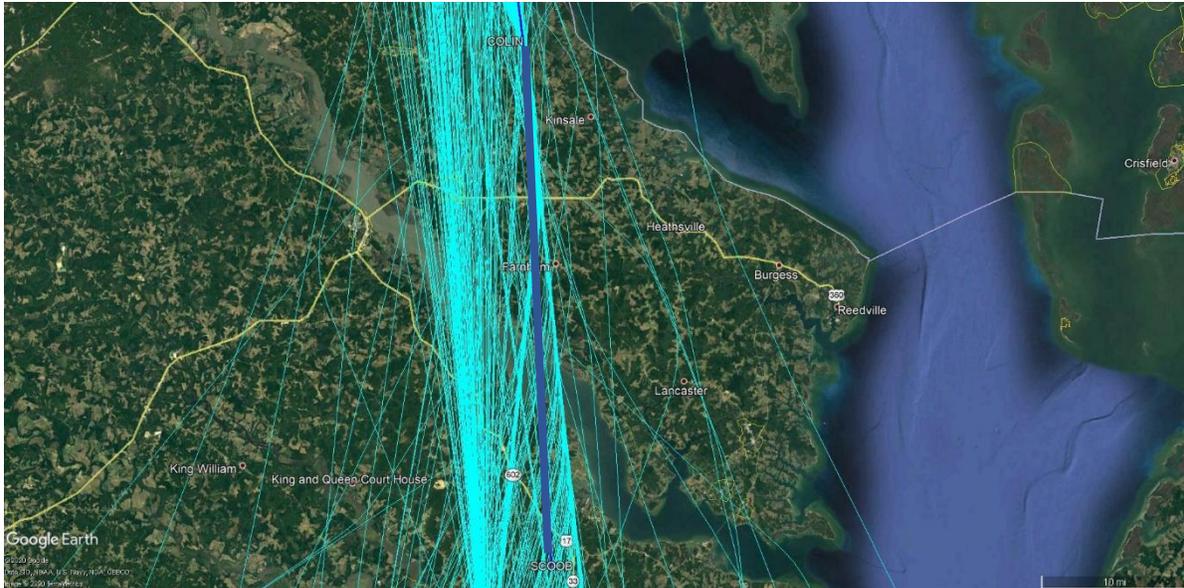


Figure 2: The blue line represents the proposed SCOOB transition. The light blue lines represent radar tracks of aircraft that are already traversing in close proximity to the proposed SCOOB transition.

FAA’s Aviation Environmental Screening Tool (AEDT) was used to conduct noise screening to evaluate whether there would be noise impacts as a result of implementing the proposed amendments. The results of the modeling indicated that there would be no reportable or significant noise impacts. The reportable range is defined as a +/- 3 decibels (dB) increase in the 60-65 Day-Night Average Sound Level (DNL) range and +/-5 dB increase in the 45-60 DNL range. A significant impact by federal standards is an increase of 1.5 dB DNL in an area exposed to 65 dB DNL. **Attachment B** contains the AEDT noise screening analysis report.

Area of Potential Effects

As part of its responsibilities under Section 106, the FAA attempted to identify the Area of Potential Effects for the undertakings described above. The Section 106 regulations define the APE as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” 36 CFR § 800.16(d).

The Proposed Actions will not cause any physical effects. However, pursuant to 36 CFR 800.5(a)(2)(v), the FAA also considered the potential for the undertakings to introduce visual, atmospheric, or audible elements that could diminish the integrity of a historic property's significant historic features. The FAA compared the current flight tracks from aircraft at DCA to the propose changes to the air traffic procedures described above. The comparison is depicted in **Figure 1**. Based on this comparison, the FAA determined that there would be no new areas overflown by the proposed SCOOB transition, and therefore no potential to introduce new visual, atmospheric or audible elements. However, amending SIDs to eliminate FERGI and instead use RGIII is expected to introduce aircraft to areas that are not currently

overflown.¹ Such areas have been identified as part of the Area of Potential Effects depicted in Figure 4.

The FAA also considered the potential for the undertaking to have noise effects that could alter the character or use of historic properties. The FAA conducted a noise screen to determine how these undertakings would affect current aircraft noise exposure levels. This analysis indicated that the undertakings would not result in any noise increase that would be “significant” or “reportable” as defined in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*. As a result, there was no Area of Potential Effects based on potential noise increases for either of the proposed changes.

In sum, the FAA proposes an Area of Potential Effects (APE) for the area between the waypoints BEBLE-FERGI-MELOE and waypoints BEBLE-RGIII-MELOE based on the potential introduction of visual, atmospheric, or audible elements. Refer to **Figure 3** to view the proposed APE. The FAA conducted a review of the National Historic Register of Historic Places to identify resources within the APE. Based on that review, no historic properties were identified within the APE in Virginia.

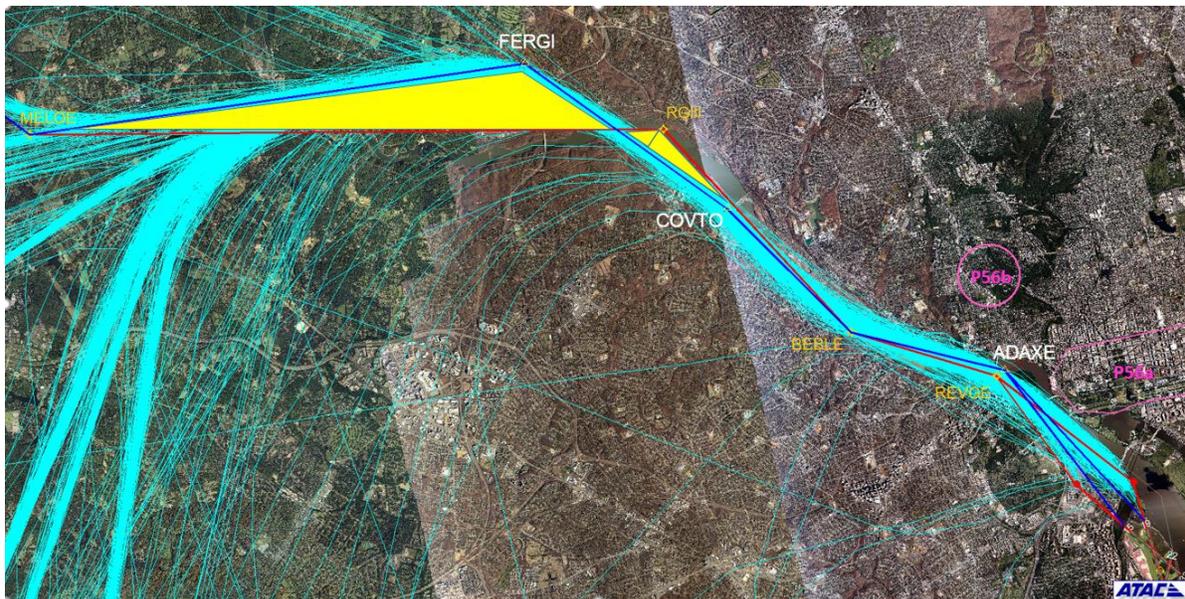


Figure 3. The APE is depicted by the yellow highlighted areas. The blue line is the current route and the red line is the proposed route. Light blue lines are radar tracks for aircraft using the current route.

Request for Concurrence

The FAA requests your review of the information listed within this document, and we seek your concurrence with a finding that the proposed implementation of the SCOOB transitions

¹ Note that while there is expected to be an introduction of aircraft overflights, a small number of aircraft currently overfly the area. Moreover, the existing flight corridor is approximately 3,500 feet north at the furthest point of change and already exposes the area to a degree of audible and visual impacts.

would have a determination of “No Effect” on historical or cultural properties and the removal of FERGI and replacement with RGIII would have a determination of "No Historic Properties Affected". If you desire to provide comments, concurrence, or objection to the FAA’s proposed findings, please provide them by letter or email within 30 days.

Thank you for your review of this project,

Andrew Pieroni

Andy Pieroni, Environmental Protection Specialist
Eastern Service Center - Operations Support Group, AJV-E250 1701 Columbia Avenue
College Park, GA 30337
(404) 305-5586 (tel)
E-mail address: andrew.pieroni@faa.gov

Cc: Maryland Historical Trust, Fairfax County Heritage Conservation, Montgomery Parks

ATTACHMENTS

Attachment A: Finding of No Adverse Impact Letter Amendment of Nine DCA Aircraft Departures



COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler
Secretary of Natural Resources

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

Section 106 Consultation, Proposal to Publish Amended Air Traffic Procedures at Reagan Nat'l -
Amended waypoint of 9 northbound departure procedures, Arlington County, Virginia

To: Andy Pieroni, FAA
Susan Stafford, FAA
Charles J. Gibson, FAA
Ryan Almasy, FAA

DHR File No. 2020-0196

FAA has made the determination of NO HISTORIC PROPERTIES AFFECTED.

DHR: Concurs

A handwritten signature in blue ink that reads "Adrienne Birge-Wilson".

Adrienne Birge-Wilson, Architectural Historian
Office of Review and Compliance
Virginia Department of Historic Resources

Date

Attachment B: Noise Screening Report

Noise Screening Analysis Report

For

Ronald Reagan Washington National Airport

KDCA

Washington, DC

Prepared by:

ATO, AJV-114, Environmental Policy Team

Tuesday, April 07, 2020

DCA Noise Screening Analysis Report *For Official Internal Use Only*

This Noise Screening Report was prepared by the FAA to assess noise exposure from the proposed project under consideration. Even though the data and results contained in the report are accurate, the report is a preliminary document, potentially subject to revision, until the FAA makes a final environmental decision related to the proposed project.

Summary

Noise analysis was completed to assess potential impacts resulting from proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC, using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Historical radar track data was used to create a baseline scenario. After the baseline scenario was built, aircraft operations assigned to the proposed procedure were modeled as flying the proposed procedure, which provides the alternative scenario. Selections for track assignments were made based on historical flight paths, and RNAV capable aircraft were assigned to the procedure nearest to their historical tracks in the alternative scenario.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. In the case of DCA, there was no significant or reportable increase in noise resulting from the proposed action.

Purpose

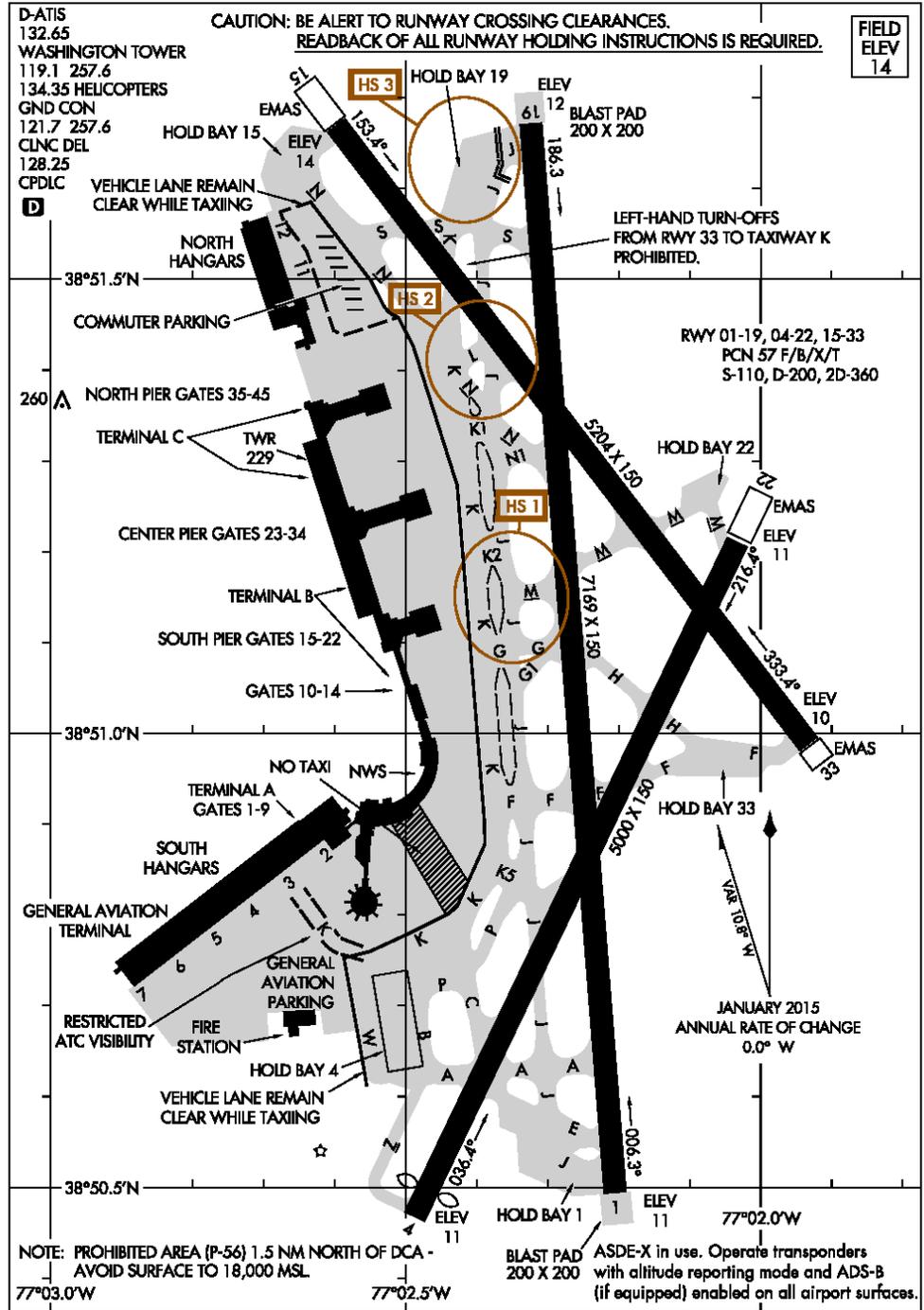
The purpose of this report is to document the process used to analyze the noise impact of proposed air traffic actions at Ronald Reagan Washington National Airport (DCA) in Washington, DC and to present the results of that analysis. The analysis of the instrument flight procedures at DCA was performed using the Terminal Area Route Generation, Evaluation, and Traffic Simulation (TARGETS) Environmental Plug-in tool and the Aviation Environmental Design Tool (AEDT).

Figure 1 shows the airport diagram for DCA, which provides the runway layout and the airport's field elevation. Table 1 shows the procedure name, type and publication date. Figures depicting the procedure changes are shown in Appendix A.

Table 1: Proposed Procedures Modeled for DCA

Procedure Name	Procedure Type
AMEEE ONE	RNAV SID
CLTCH TWO	RNAV SID
DOCTR FIVE	RNAV SID
HORTO THREE	RNAV SID
JDUBB TWO	RNAV SID
REBLL FOUR	RNAV SID
SCRAM FOUR	RNAV SID
SOOKI FIVE	RNAV SID
WYNGS FOUR	RNAV SID

19283 **AIRPORT DIAGRAM** RONALD REAGAN WASHINGTON NATIONAL (DCA)
 AL-443 (FAA) WASHINGTON, D.C.



AIRPORT DIAGRAM WASHINGTON, D.C.
 19283 RONALD REAGAN WASHINGTON NATIONAL (DCA)

Figure 1: Airport Diagram of DCA

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Methods

Noise screening was completed using the TARGETS Environmental Plug-in tool to calculate Day-Night Average Sound Levels (DNL) from existing operations (baseline) and modeled operations to replicate the proposed action (alternative). Historical radar track data for DCA was obtained from the Performance Data Analysis and Reporting System (PDARS). After concurrence of the dates to be used by the environmental specialist and air traffic facility, 60 days of random radar track data were selected for the DCA analysis representing a range of temperature and wind conditions as well as being representative of the average runway usage. A list of the tracks selected for analysis are shown in Appendix B.

After the removal of overflights, incomplete track segments, and other unusable tracks, 24,743 tracks were used for the analysis. The altitude of the historical tracks was considered and a range ring was set to contain the area where most of the tracks reached above 10,000 feet Above Field Elevation (AFE). This established the study area and the tracks outside of the study area were removed from the analysis. In the case of DCA, the study area is a circle with a radius of 40 nautical miles (nm) centered over the airport.

The randomly selected dates are presumed to represent average traffic counts and traffic flows through various seasons and peak travel times for DCA. There were no significant runway outages or significant conditions that would otherwise result in abnormal traffic counts or traffic flows. In order to calculate the Average Annual Day (AAD) impacts, traffic counts for average daily departures and arrivals used for annualization in this analysis were obtained through the FAA's AFS Data Analytics Runway Usage Module.

Historical radar track data was used to create a baseline noise exposure, which provides lateral path definition, aircraft fleet mix, departure/arrival stream proportions for each runway, and day/night traffic ratios. The alternative scenario was built by taking aircraft operations and assigning them to the proposed procedure instead of their historical tracks. RNAV capable aircraft were assigned to the procedure based on their historical tracks, proximity to other procedures, and any additional usage information from the Environmental Specialist. In the case of DCA, all operations departing from runways 01 and 03 were assigned to a proposed procedure.

The analysis does not take into account terrain. All calculations were made in reference to the airport's field elevation. The altitude controls were based on AEDT standard aircraft profiles. With respect to lateral distribution, a 0.5 nm dispersion for RNAV procedures was used and a 0.3 nm dispersion for RNP procedures was used based standard methods for noise screening. For tracks near the runway where dispersion is normally less than 0.3 nm, dispersion was based on historical track data.

Once the baseline and alternative scenarios were built, the TARGETS Environmental Plug-in Tool was used to generate noise outputs for both scenarios. The Environmental Plug-in Tool uses the Aviation Environmental Design Tool to calculate noise. The noise output files from AEDT for both the baseline and alternative noise exposures consist of a series of equally spaced grid points, each showing the DNL value. The noise grid (receptor set) is a square grid extending 30 nm in each direction of the airport with grid points (receptors) spaced 0.25 nm apart. The noise results of the baseline and alternative scenarios were then compared to test for potential noise impacts.

The noise impact is a comparison between the baseline and the alternative noise exposure that depicts reportable and significant noise changes at all affected locations per the criteria indicated in FAA Order 1050.1F and Chapter 32 of FAA Order 7400.2K. The reportable and significant noise increases and decreases (if any) are then depicted on an aerial map.

Results

1. Noise Exposure

The baseline and alternative noise exposure is shown in Figure 3-1 and Figure 3-2, which depicts the levels and locations of the noise produced by the historical radar track data for arrivals and departures.

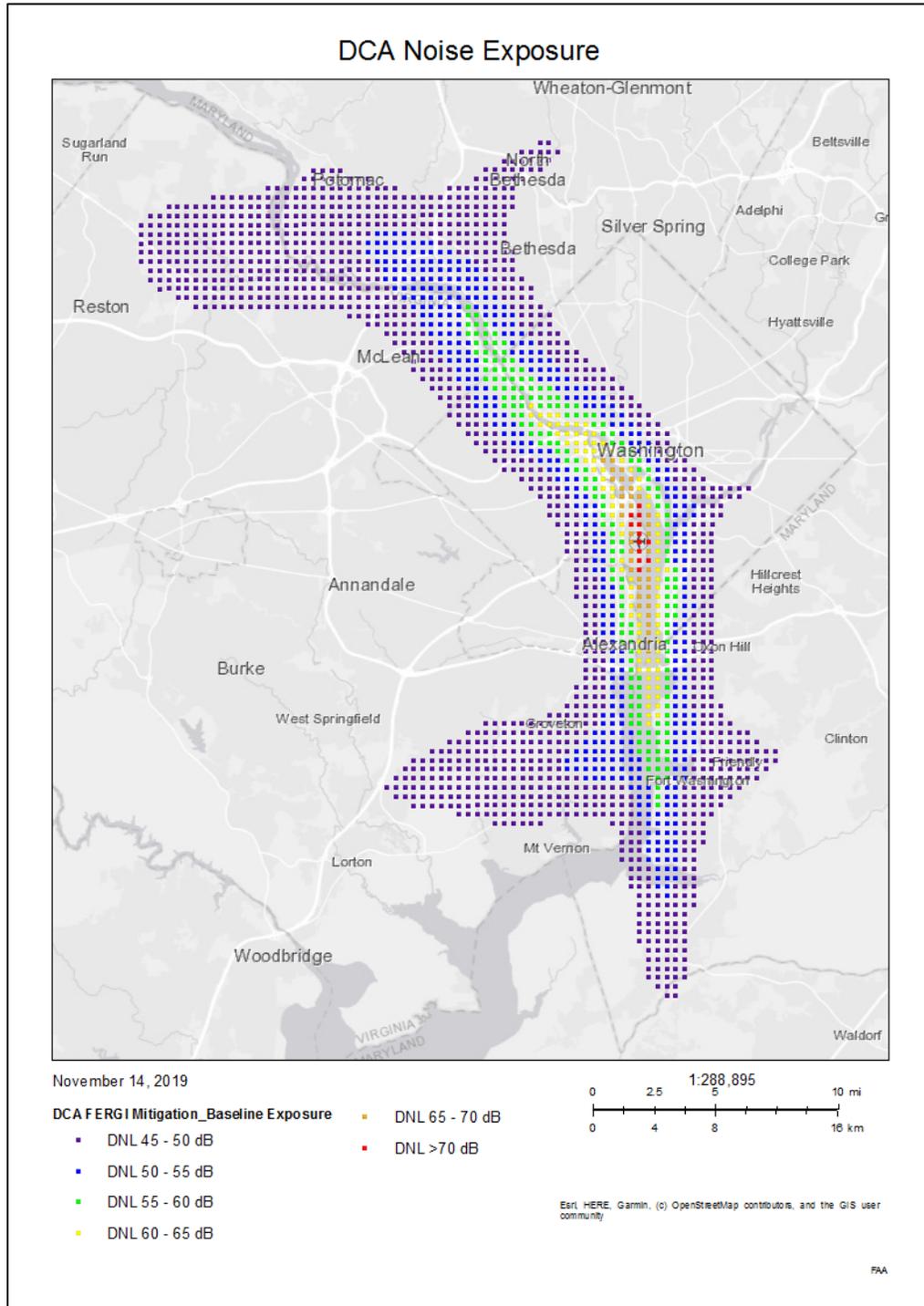


Figure 3-1: Baseline Noise Exposure in TARGETS

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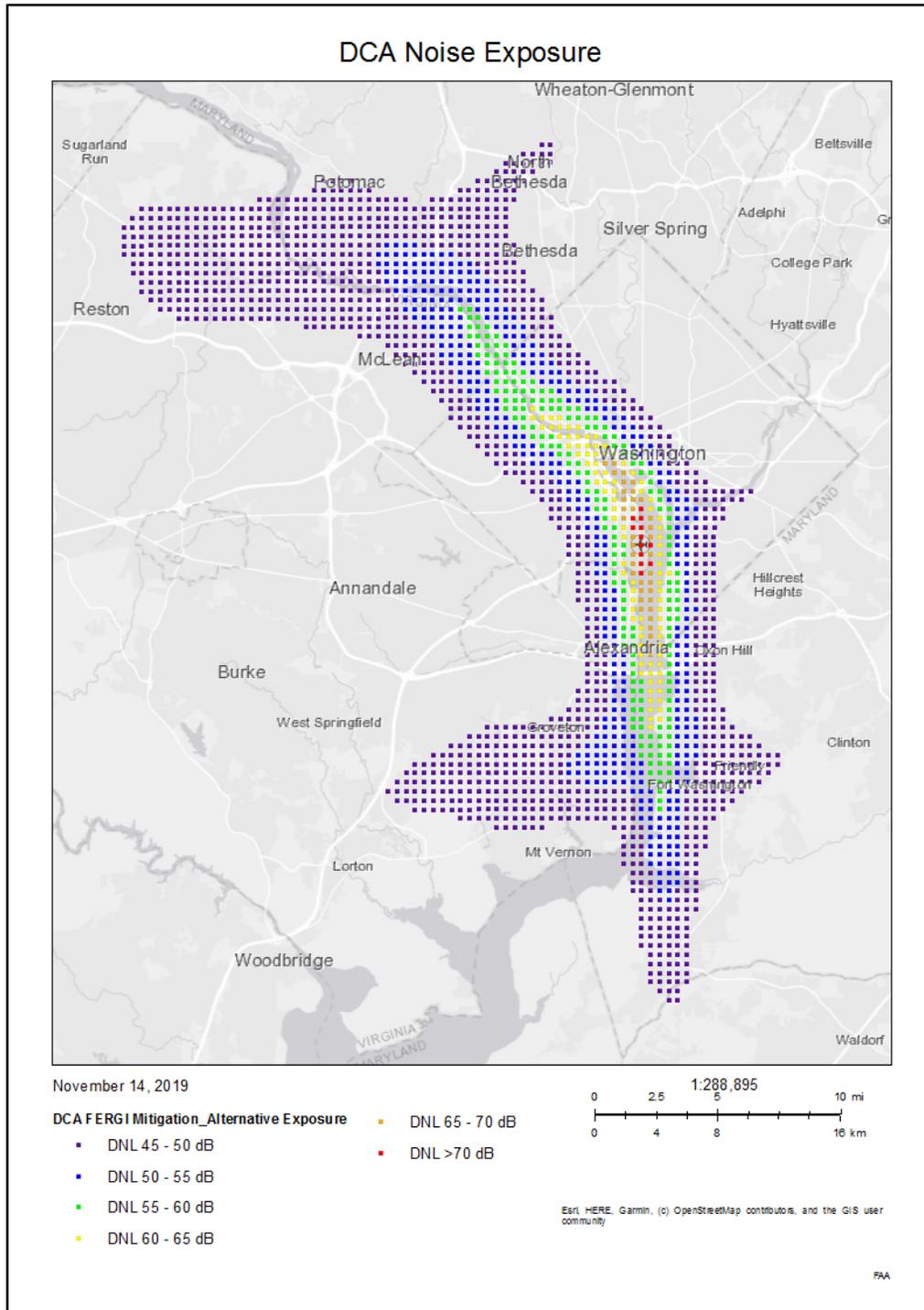


Figure 3-2: Alternative Noise Exposure for the Proposed Procedures in TARGETS

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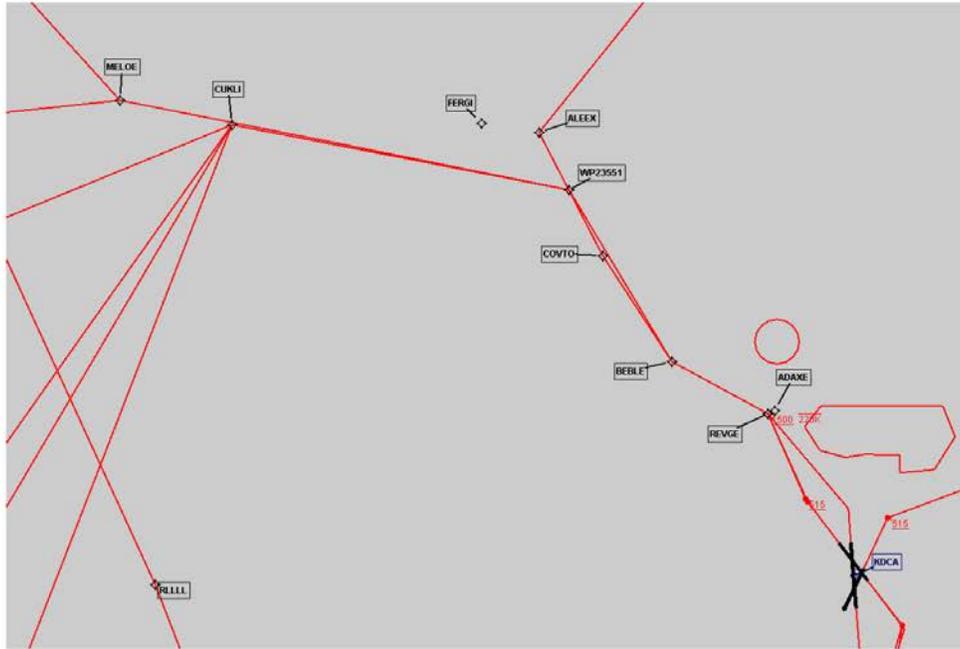
2. Noise Impacts

A comparison of the baseline and alternative scenarios by the TARGETS Environmental plug-in determines the noise impacts of the proposed action. Significance of noise impacts is defined by FAA Order 1050.1F¹ which establishes the threshold for significant increases in noise exposure. Where the proposed action results in a noise impact, TARGETS graphically displays a noise impact layer that indicates the locations of reportable and significant changes. When applicable, these impacts are shown overlaying a map view of the area surrounding the airport. In the case of DCA, there was **no significant increase in noise resulting from the proposed action.**

¹ According to Exhibit 4-1 of FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, a noise impact is significant if “*The action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe.*”

Appendix A Proposed Changes to DCA SIDS

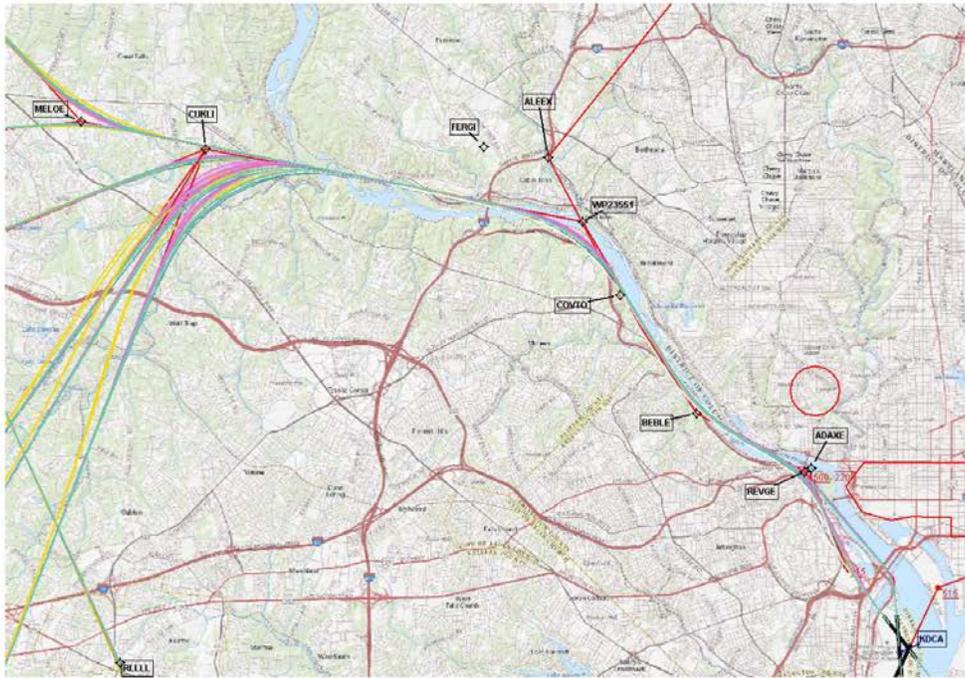
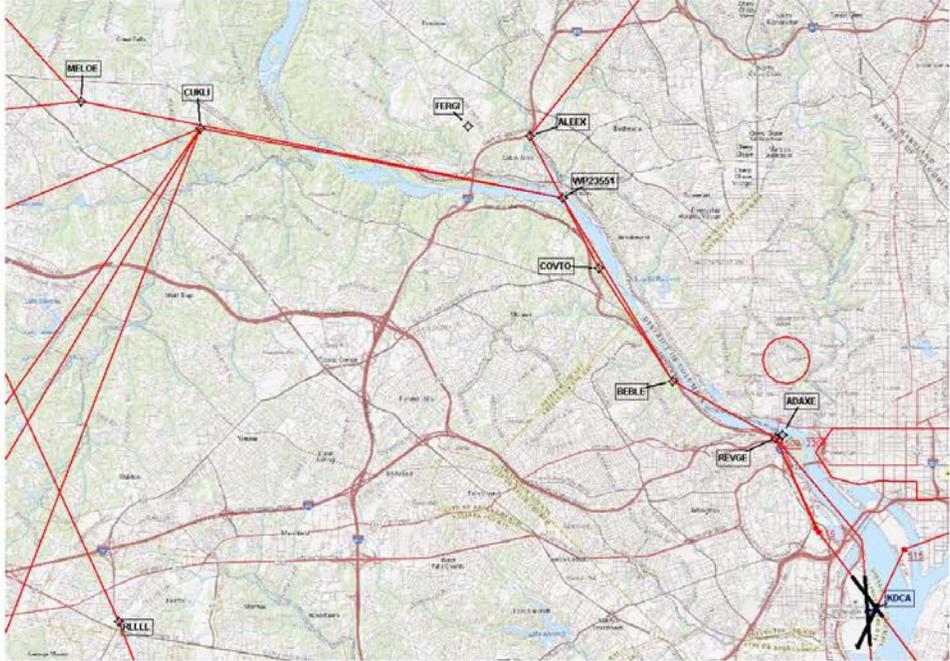
DCA SIDS - ALTERNATIVE ROUTE FROM BEBLE TO CUKLI/MELOE



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DCA SIDS - ALTERNATIVE ROUTE FROM BEBLE TO CUKLI/MELOE



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19	10/14/2018
20	10/16/2018
21	10/17/2018
22	10/19/2018
23	10/21/2018
24	10/31/2018
25	11/7/2018
26	11/12/2018
27	12/1/2018
28	12/4/2018
29	12/7/2018
30	12/11/2018

31	12/12/2018
32	12/13/2018
33	12/18/2018
34	12/23/2018
35	12/27/2018
36	12/31/2018
37	1/3/2019
38	1/28/2019
39	1/30/2019
40	2/4/2019
41	2/5/2019
42	2/6/2019
43	2/8/2019
44	2/15/2019
45	2/18/2019
46	2/25/2019
47	3/9/2019
48	3/12/2019
49	3/20/2019
50	3/26/2019
51	3/27/2019
52	3/28/2019
53	4/25/2019
54	4/26/2019
55	4/27/2019
56	5/1/2019
57	5/3/2019
58	5/6/2019
59	5/23/2019
60	5/28/2019

From: [Birge-wilson, Adrienne](#)
To: [Pieroni, Andrew \(FAA\)](#)
Subject: Re: DHR File No. 2020-0196 FAA Updated Project Review Request
Date: Tuesday, April 28, 2020 8:50:38 AM

Andy, DHR concurs with the FAA's determination of No Historic Properties Affected.

V/R,

Adrienne Birge-Wilson
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221
(804) 482-6092
adrienne.birge-wilson@dhr.virginia.gov

*** COVID-19 Update: DHR is open for business and the majority of staff is teleworking. Our offices are temporarily closed to the public. ***

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On Tue, Apr 28, 2020 at 8:41 AM Pieroni, Andrew (FAA) <Andrew.Pieroni@faa.gov> wrote:

Adrienne,

Thank you for your quick review of the project and your assistance with a more appropriate determination of "No Historic Properties Affected." As such, the FAA updated the attached letter for your review. Please feel free to reach out if you have any additional questions or thoughts.

Thank you again,

Andy

From: Birge-wilson, Adrienne <adrienne.birge-wilson@dhr.virginia.gov>
Sent: Monday, April 27, 2020 2:43 PM
To: Pieroni, Andrew (FAA) <Andrew.Pieroni@faa.gov>
Subject: Re: DHR File No. 2020-0196 FAA Updated Project Review Request

Andrew- Perhaps you can clarify the "No Adverse Effect" determination. If there are no historic properties in the APE- the more appropriate determination would be "No

Historic Properties Affected".

V/R,

Adrienne Birge-Wilson
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221
(804) 482-6092
adrienne.birge-wilson@dhr.virginia.gov

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On Mon, Apr 27, 2020 at 11:32 AM Pieroni, Andrew (FAA) <Andrew.Pieroni@faa.gov> wrote:

Adrienne,

I hope that you are doing well, given the current circumstances? Please find the Federal Aviation Administration's (FAA's) request for review regarding the updated project referenced in the subject line. Please let me know if an e-mail request is allowable, given our current full-time telework requirement. Please let me know that you received this request and let me know if you have any questions regarding our updated project request.

Thank you,

Andy Pieroni

Andy Pieroni

Environmental, CI & NAS Analytics

Eastern Service Center, Operations Support Group (AJV-E25)

Office: (404)-305-5586, Cell: (770)-315-1192

From: [Berray, Lisa](#)
To: [Pieroni, Andrew \(FAA\)](#)
Subject: Re: Updated Project Submittal for the Following Project: Federal Aviation Administration, Air Traffic Procedures at Ronald Reagan Washington National Airport (DCA)
Date: Wednesday, May 06, 2020 9:27:44 AM

Yes, I received this. Thank you!!

Lisa Jane Berray, C.I.G.
Manager of Interpretation
Montgomery Parks- Agricultural History Farm Park
18400 Muncaster Rd.
Derwood, MD 20855
301-467-8273

From: Pieroni, Andrew (FAA) <Andrew.Pieroni@faa.gov>
Sent: Wednesday, May 6, 2020 9:24:20 AM
To: Berray, Lisa <lisa.berray@montgomeryparks.org>
Subject: RE: Updated Project Submittal for the Following Project: Federal Aviation Administration, Air Traffic Procedures at Ronald Reagan Washington National Airport (DCA)

Ms. Berray,

Can you please verify you received the email below? I want to ensure that you received a copy of our SHPO correspondence and provide you an opportunity to review our findings.

Thank you,
Andy

From: Pieroni, Andrew (FAA)
Sent: Monday, April 27, 2020 1:59 PM
To: Lisa.Berray@montgomeryparks.org
Subject: Updated Project Submittal for the Following Project: Federal Aviation Administration, Air Traffic Procedures at Ronald Reagan Washington National Airport (DCA)

Dear Ms. Berray,

I hope you are doing well, considering the current situation?

Pursuant to Section 106 of the National Historic Preservation Act, the FAA has been consulting with the State Historic Preservation Officers in Maryland, Virginia, and the District of Columbia with regard to certain proposed changes to air traffic procedures at Reagan National Airport (DCA). Attached is the FAA's most recent consultation letter, which was sent to the Maryland and Virginia SHPOs, and which describes those changes. As you will see, this letter proposes a finding of no adverse effect for an undertaking – the replacement of FERGI waypoint with RGIII – which has an APE

within your county.

The FAA is sharing this proposed finding with you pursuant to 36 CFR 800.5(c). If you desire to provide comments, concurrence, or objection to the FAA's proposed finding, please provide them in writing within 30 days. In light of the challenges posed by COVID-19, we would appreciate confirmation that you received this letter and that you are the correct point of contact for Montgomery County for this matter.

Thank you for your review.

Andy Pieroni
Environmental, CI & NAS Analytics
Eastern Service Center, Operations Support Group (AJV-E25)
Office: (404)-305-5586, Cell: (770)-315-1192

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County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

May 27, 2020

Federal Aviation Administration
Eastern Service Center – Operations Support Group, AJV-E250
ATTN: Andrew Pieroni, Environmental Protection Specialist
1701 Columbia Avenue
College Park, Georgia 30337

RE: Federal Aviation Administration (FAA) Proposal to Amend Aircraft Departure Procedures at Ronald Reagan Washington National Airport – Supplemental Changes (FERGI/RGIII and SCOOB)

Dear Mr. Pieroni:

This memorandum provides comments from Fairfax County regarding the proposed Amendment of aircraft departure procedures at Ronald Reagan Washington National Airport (DCA), as requested by the FAA, regarding the “FERGI” and “RGIII” departure waypoints, which refer to defined geographic positions on an aircraft departure route, and the “SCOOB” transition, which is a routing that would allow departing aircraft to transition into a high-altitude route structure.

PROPOSED ACTION

On February 25, 2020, the FAA submitted a project request to the Virginia Department of Historic Resources for the amendment of nine northbound departure procedures. On April 27, 2020, the FAA supplemented its earlier request by seeking concurrence on two additional proposed changes to departure procedures at DCA. All changes to proposed departure procedures are expected to be made at the same time.

FERGI/RGIII

The first proposed supplemental change would be to remove a waypoint named FERGI from six of the Standard Instrument Departure (SID) procedures. The FERGI waypoint is located approximately 3,000 feet northwest of I-495 along Persimmon Tree Road in Maryland. FERGI would be replaced by a waypoint called RGIII, which would be located to the southeast along the Potomac River, approximately halfway between Cabin John Island in Maryland and Turkey Run Park in Virginia. Aircraft departing from DCA would reach RGIII sooner than FERGI. Using the RGIII waypoint would keep aircraft over the Potomac River for this portion of the departure route and avoid the overflight of populated portions of Maryland. This proposed change is consistent with the recommendations of the Metropolitan Washington Airports Authority’s (MWAA’s) Noise Compatibility Program for DCA. The proposed action was unanimously endorsed by the DCA Community Noise Working Group on September 26, 2019. The DCA



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Department of Planning and Development

Planning Division
12055 Government Center Parkway, Suite 730
Fairfax, Virginia 22035-5507
Phone 703-324-1380
Fax 703-653-9447

www.fairfaxcounty.gov/planning-development

Community Noise Working Group was convened by MWWA and is comprised of representatives from communities affected by DCA aircraft noise and makes recommendations to the FAA to address noise concerns. The FAA is proposing a finding of “No Historic Properties Affected” for the change in departure routing associated with the proposed use of the RGIII waypoint.

SCOOB

The second proposed supplemental change is the addition of a high-altitude (above 18,000 feet Mean Sea Level) transition route called SCOOB, which is located near Saluda, Virginia, approximately 110 miles southeast of Great Falls. The addition of SCOOB is proposed due to anticipated changes in the Northeast Corridor routes that transition air traffic north and south along the east coast of the United States. Aircraft departing on various departure routes from DCA, Dulles International Airport, and Baltimore-Washington International Airport would utilize SCOOB to transition into high-altitude routes. The FAA states that the creation of the SCOOB transition is intended to minimize controller workload and is not expected to be noticeable to the public. The FAA is proposing a finding of “No Effect” on historic or cultural properties for the addition of the SCOOB transition.

Noise Screening

As part of its responsibilities under Section 106 of the National Historic Preservation Act, the FAA identified Areas of Potential Effects (APEs) for the undertakings described above. The Section 106 regulations define the APE as *“the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”* (36 CFR §800.16(d)).

The APEs were defined through a comparison of the current and proposed flight tracks. Amending the departure procedures to eliminate the FERGI waypoint and create the RGIII waypoint are expected to introduce aircraft to areas that are not currently overflown and to eliminate air traffic in other areas. The FAA determined that there would be no new areas overflown by the proposed SCOOB transition.

The FAA performed noise modeling to evaluate whether there would be noise impacts associated with the proposed amendments. The reportable range is defined as a +/- 3 decibels (dB) increase in the 60-65 Day-Night Average Sound Level (DNL) range and +/-5 dB increase in the 45-60 DNL range. A significant impact by federal standards is an increase of 1.5 dB DNL in an area exposed to 65 dB DNL. The results of the modeling indicated that there would be no reportable or significant noise impacts.

COMMENTS

Heritage Resources

Heritage Resources staff of the Fairfax County Department of Planning and Development reviewed the FAA proposal. Staff’s primary concern was the potential impact on Colvin Run Mill and the Colvin Run Mill Historic Overlay District. The mill, located at 10017 Colvin Run Road, was listed on the National Register of Historic Places on August 16, 1977. Colvin Run

Mill is also on the Virginia Landmarks Register and the Inventory of Historic Sites. The mill was constructed circa 1810 and has been a longstanding landmark and an integral component of the local economy and community.

While it is understood that there may already be a limited impact on Colvin Run Mill from existing departures flying south-southwest out of the CUKLI departure waypoint, the proposal may introduce an increased number of overflights as aircraft maneuver to intercept the outbound course from CUKLI, potentially creating a negative aural and visual effect to the mill.

Fairfax County recognizes that the addition of the high-altitude SCOOB transition is significantly removed from Fairfax County and would not alter any local departure procedures. As such, staff does not anticipate increased noise impacts in the local area from the addition of this transition.

Areas of Potential Effects

Regarding the APEs, the FAA defined these as the triangular areas created by the intersections of the current and proposed flight tracks. Rather than creating triangular areas between the intersecting flight paths, for future projects, staff recommends an alternative approach in which “buffer” areas are created and compared around the current and expected flight paths. For the current flight route segments, buffer areas could be defined by the actual flight tracks taken from radar data. For the proposed departure route segments, buffers could be defined by the lateral displacement allowed by air traffic controllers to the left and right of each course line. Flight paths should also recognize that aircraft may maneuver prior to reaching a waypoint in order to “roll out” directly onto an outbound course.

Additionally, for future projects, staff’s analysis of the proposed changes would benefit from knowing the approximate altitudes of aircraft along each course segment and whether aircraft are in a continuous climb or are held at particular “ceilings” until cleared to climb by air traffic controllers. Staff would also appreciate larger graphics with higher resolutions and the inclusion of additional land reference features. Interpreting the location of the various tracks was difficult and discerning the differences between noise maps was not reasonable.

Thank you for the opportunity to comment on this project. If you have any questions regarding these comments, please contact Joseph Gorney at 703-324-1380 or joseph.gorney@fairfaxcounty.gov.

Sincerely,



Leanna H. O’Donnell, Director, Planning Division
Department of Planning and Development

cc: Board of Supervisors
Bryan Hill, County Executive
Rachel Flynn, Deputy County Executive

Andrew Pieroni

Amendment of Departure Procedures at Ronald Reagan Washington National Airport

Page 4

Barbara Byron, Director, DPD

Denise James, Chief, Environment & Development Review Branch (EDRB), Planning
Division (PD), DPD

Laura Arseneau, Chief, Heritage Resources Branch, PD, DPD

Joseph Gorney, Senior Environmental Planner, EDRB, PD, DPD

Andrea Dorlester, Fairfax County Park Authority

Julie Langan, Virginia Department of Historic Resources

Christine Morin, Mount Vernon District Office

LO: JCG