

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



September 19, 2016

Ms. Lisa Favors  
Environmental Specialist  
Eastern Service Center, Operations Support Group  
U.S. Department of Transportation  
Federal Aviation Administration  
Via Email To: [Lisa.Favors@FAA.GOV](mailto:Lisa.Favors@FAA.GOV)

RE: FAA Proposal to Publish Air Traffic Procedure at Ronald Reagan National Airport (“LAZIR B”)

Dear Ms. Favors:

Thank you for contacting the District of Columbia State Historic Preservation Officer (SHPO) regarding the above-referenced undertaking. We have reviewed the information and are writing to provide our initial 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.

According to the project submittal, the FAA proposes to implement new departure procedures serving Ronald Reagan National Airport. We understand this to mean that the FAA will be establishing new flight paths for planes departing from National Airport. We also understand that the intended goal of the new procedures is to direct planes over the Potomac River so that flight noise will be minimized over land.

The evaluation of audible effects is a complicated matter involving numerous technical aspects with which we are not familiar, but the Section 106 regulations do establish that audible effects have the potential to constitute “adverse effects” on historic properties. According to 36 CFR 800.5(a)(2)(v), the “introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features” is included among the examples of adverse effects.

The results of the noise screening analysis conducted for this undertaking were not included in the project submittal. Instead, reference was made to a “report dated May 19, 2016.” We do not know the results of the analysis, but understand that the FAA proposes to make a finding of “No Effect” (Page 1 of the project submittal) and/or “No Adverse Effect” (Page 3 of the project submittal) based upon those results. The finding of effect also appears to be based upon the statement in the project submittal which establishes that a “Significant impact by federal standards is an increase of 1.5 dB DNL in an area exposed to 65 dB DNL.” However, even though it appears that the 1.5dB federal standard for significant impact may not have been met, we are unable to concur with FAA’s proposed finding of effect at this time.

We have received numerous comments from a group of concerned citizens known as the Fair Skies Coalition (see attached) which the FAA must consider as part of the Section 106 review process. The concerns express not only the Coalition's frustrations with the noise levels resulting from the c. 2013 departure procedures (i.e. "LAZIR"; Optimization of Airspace and Procedures in the DC Metroplex; SHPO Project Number 13-433), but also with those that the Coalition anticipates will result from the currently proposed flight path modifications ("LAZIR B"). This level of concern suggests that the relatively recent changes in noise levels are quite noticeable and that the proposed undertaking has the potential to constitute an adverse effect on the many historic properties that are located within the portion of the 1.5 nautical mile Area of Potential Effect (APE) that lies within the District of Columbia. According to Fair Skies Coalition, a slight reduction in decibel levels over the Georgetown Historic District may result from LAZIR B, but other historic properties to the north and west of Georgetown are likely to be subjected to higher decibel levels. We suspect that similar variations will exist over the historic properties located within the Virginia portion of the APE.

Without further information, we are unable to concur with FAA's finding of no (adverse) effect. We request the FAA to provide our office with a detailed breakdown of the LAZIR B-associated noise levels that are anticipated over the entire APE. For ease of comparison, we would appreciate the data being provided in the form of a map that includes variations in decibel levels depicted in differing colors (or a similar, easily understandable format). We also request a similar illustration of the noise levels associated with LAZIR and, for the sake of comparison, those associated with what we understand to be precursor of the LAZIR and LAZIR B procedures – "National 328." Comparing the effects of these various flight procedures will allow us to gain a better understanding of the potential effects of the currently proposed undertaking on historic properties and to provide additional comments regarding the FAA's proposed finding of effect.

If you should have any questions or comments regarding this matter, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, thank you for providing this initial opportunity to review and comment on this undertaking.

Sincerely,



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

16-0621  
Enclosures  
cc: Fair Skies Coalition