

Rising Skylines, An Urban Airport, And The Civic Federation

ARLINGTON COUNTY
CIVIC FEDERATION



Engine Failure
Obstruction Evaluation
Criteria Change

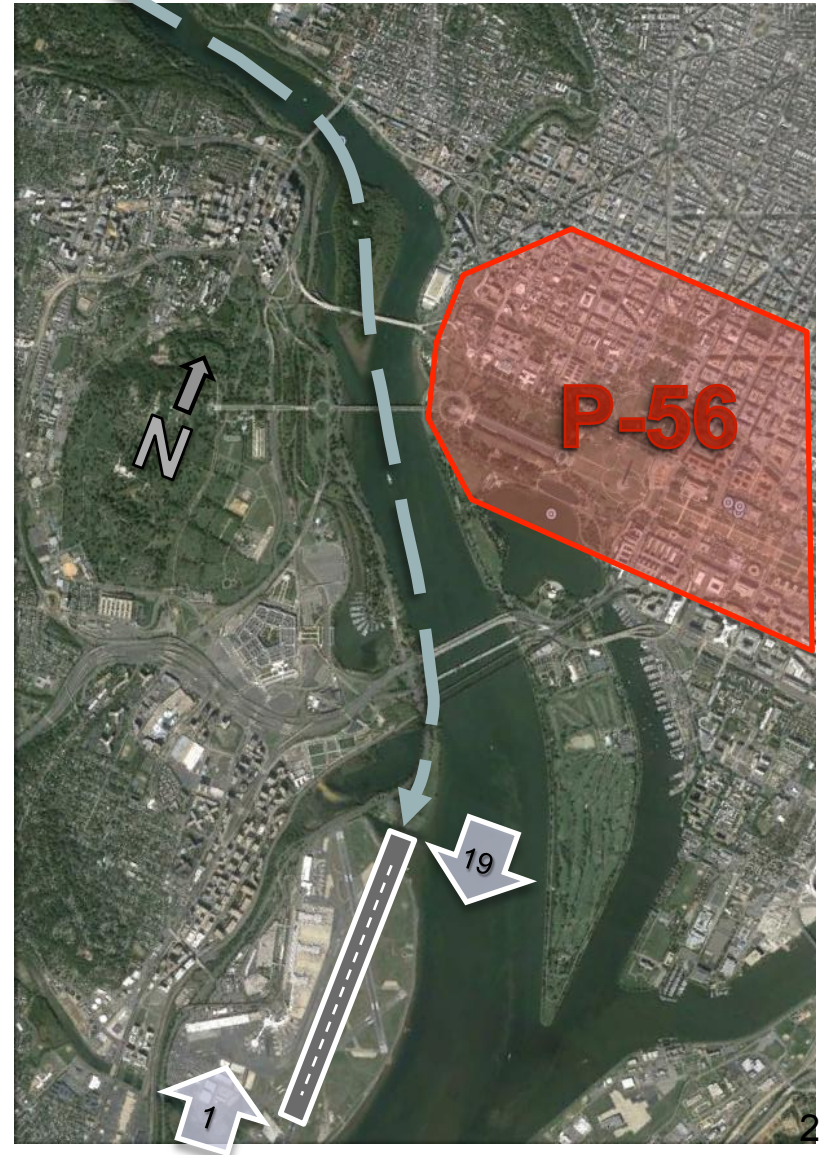




Reagan National Airport In Arlington County

- An Urban Airport
- 185,000 airline takeoffs and landings each year
- Run by MWAA*
- FAA controls aircraft inflight
- Special aircraft requirements for operations near DC
- Unusually short runways
- Prohibited area P-56

* Metropolitan Washington Airports Authority





Navigation Safety Responsibilities For Arlington County

↻ *Code of Virginia § 15.2-2294. Airport safety zoning* ↻

Every locality in whose jurisdiction a licensed airport or United States government or military air facility is located or (ii) over whose jurisdiction the approach slopes and other safety zones of a licensed airport, including United States government or military air facility extend **shall, by ordinance, provide for the regulation of the height of structures** and natural growth **for the purpose of protecting the safety of air navigation and the public investment in air navigation facilities.** The ordinance may be adopted regardless of whether the local governing body has adopted a zoning ordinance applicable to other land uses in the locality. The **ordinance may be designed and adopted by the locality as an overlay zone** superimposed on any preexisting base zone.

Arlington's Zoning Ordinance Code §14.5. Aircraft Landing Approach Area

No building meeting Federal Aviation Administration criteria for notice (§77.9 Construction or alteration requiring notice) **shall be erected, constructed, reconstructed, structurally altered, enlarged or moved** per the requirements in 14 Code of Federal Regulations, part 77 pursuant to 49 U.S.C, Section 44718 as amended, **unless** the zoning administrator shall have **received a letter of clearance from the Federal Aviation Agency.**

Federal Code requires an FAA Obstruction Evaluation for structures over 200' tall (within 3 miles of an airport) or 500' (anywhere), which results in either a hazard or no hazard determination. However, FAA has no enforcement authority.



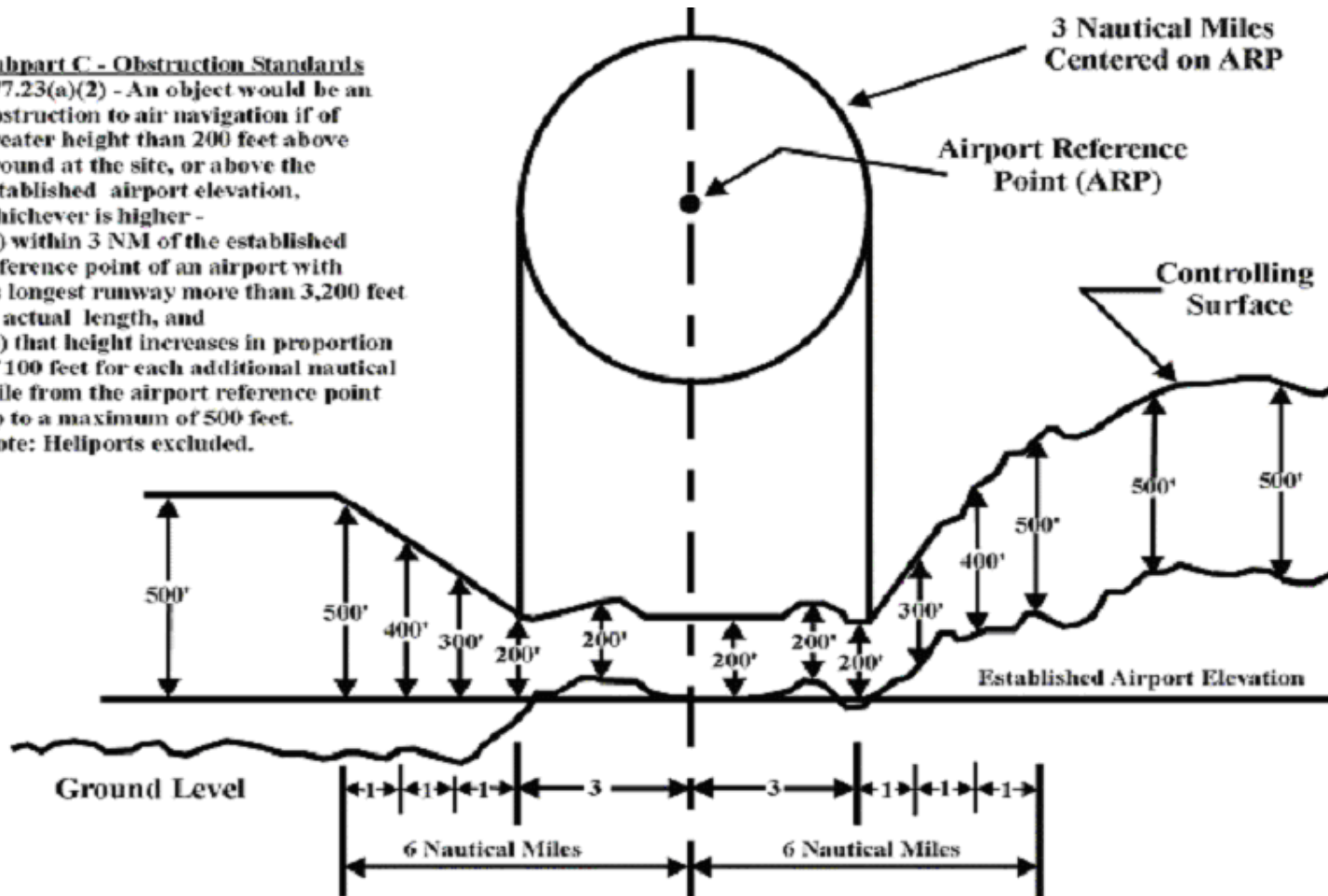
FAA Evaluates Obstructions Using Multiple Criteria (example below)

Subpart C - Obstruction Standards

§77.23(a)(2) - An object would be an obstruction to air navigation if of greater height than 200 feet above ground at the site, or above the established airport elevation, whichever is higher -

- (a) within 3 NM of the established reference point of an airport with its longest runway more than 3,200 feet in actual length, and
- (b) that height increases in proportion of 100 feet for each additional nautical mile from the airport reference point up to a maximum of 500 feet.

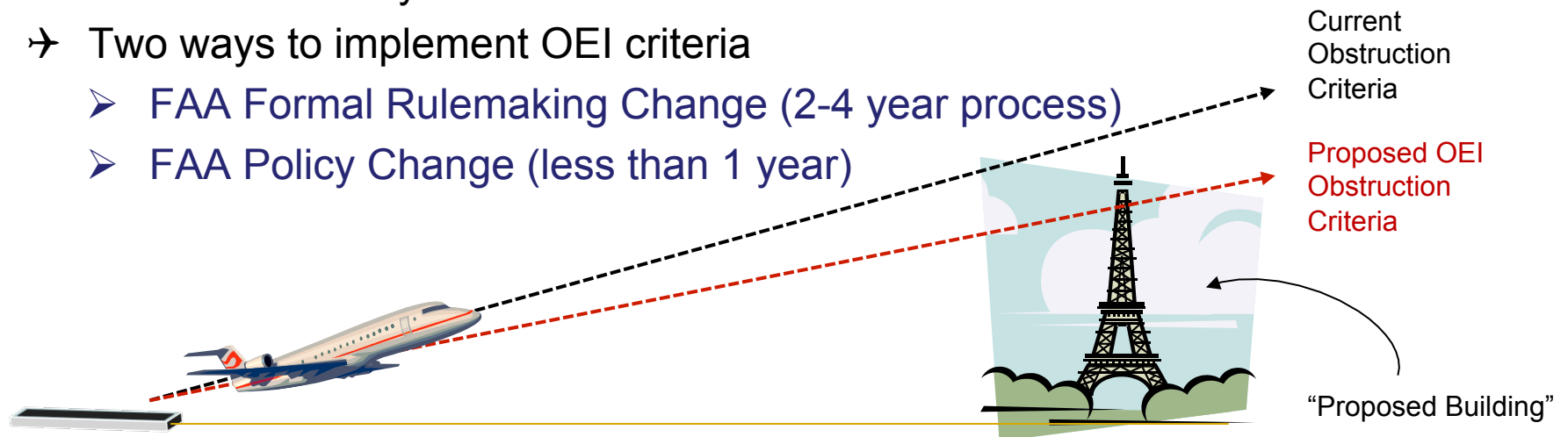
Note: Heliports excluded.





FAA's Current Obstruction Criteria Does Not include One Engine Inoperative (OEI) Aircraft

- FAA Obstruction Evaluation doesn't provide for OEI height criteria
 - Example: Fully loaded B-737 with engine failure on takeoff (warm day) might only clear 450' above sea level on climb passing Rosslyn
- In 2011, FAA conducted study of 5 urban airports including Reagan National
 - Study concluded OEI paths need to be protected with height criteria
- If building heights increase, airlines say they may have to reduce their weight, carrying fewer passengers and fuel—limiting their operations and economic viability
- Two ways to implement OEI criteria
 - FAA Formal Rulemaking Change (2-4 year process)
 - FAA Policy Change (less than 1 year)





Departure Constraints

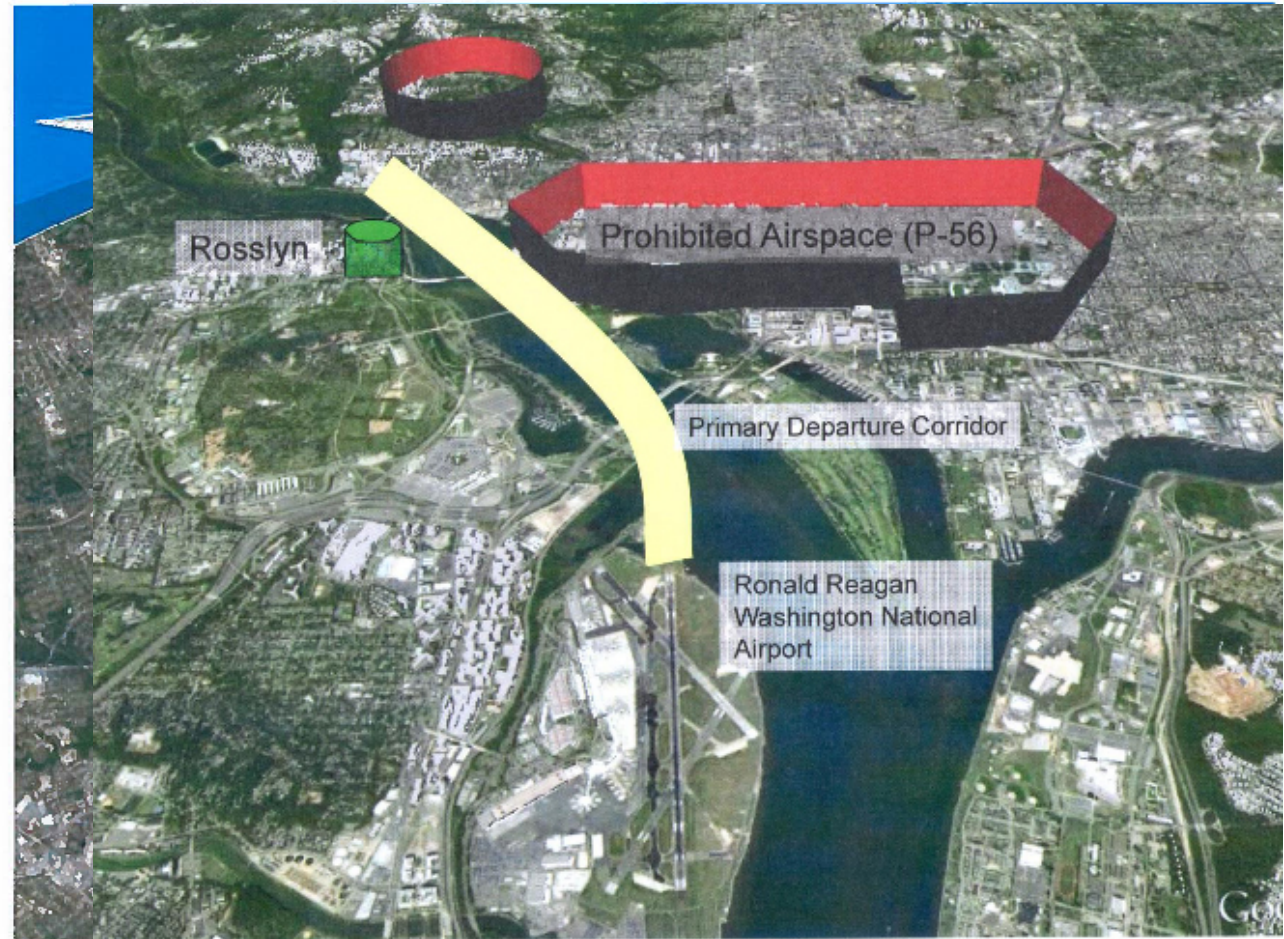
Planes use northern or southern departure depending on wind.

Southern departure:

- River is wider south of the airport.
- OEI path easily stays over Potomac.

Northern departure (challenges shown)

- River is narrower and meanders.
- P-56 must be avoided.
- Rosslyn building heights increasing.



Ronald Reagan Washington National Airport Airspace Constraints



FAA Notice of Proposed Policy (NPP)

- 2004-2014 – FAA proposed joint working group (FAA, MWAA, Arlington) for Crystal City and Rosslyn building heights Zone Study
- April 2014 - FAA issued proposed OEI policy change
- June-July 2014 - comment period:
 - MWAA and airlines agreed with adopting the OEI Policy change
 - Rosslyn Bid and Arlington developers opposed NPP process
 - Arlington County Manager letter preferred full rulemaking process
- Civic Federation resolution introduced in September General Meeting



What Are The Impacts of Delaying OEI Change for Rulemaking Process?

If a Formal Rulemaking Process Is Followed:

- OEI Paths for emergency aircraft will not be protected for the foreseeable future.
 - FAA cannot use OEI safe path criteria until the 2-4 year process is complete.
 - In interim, new proposed structures would be evaluated using current (higher) FAA part 77 obstruction height criteria.
 - Arlington planning documents such as Sector Plans and Phased Development Site Plans would not have OEI criteria and paths to consider/incorporate.
 - Current draft of Realize Rosslyn Plans does not make any mention of current or foreseeable OEI height restrictions.
- Inhibits collaborative working group (MWAA, County, Developers, and Community).



Backup Slides



