

ENVIRONMENTAL EVALUATION FORM "C" (Short Environmental Assessment) for AIRPORT DEVELOPMENT PROJECTS



~ Aviation in Harmony with the Environment ~



FEDERAL AVIATION ADMINISTRATION EASTERN REGION AIRPORTS DIVISION

Airport Name: <u>Washington Dulles International Airport (IAD)</u>
Proposed Project: <u>International Arrivals Building (IAB) Expansion</u>

This Environmental Assessment becomes a Federal document when evaluated and signed by the responsible FAA official.

Responsible FAA Official:	Date:
responsible i i i i contrat.	Date.

PUBLIC NOTICE

WASHINGTON DULLES INTERNATIONAL AIRPORT ENVIRONMENTAL ASSESSMENT FOR AN EXPANSION TO THE INTERNATIONAL ARRIVALS BUILDING AND DEMOLITION OF THE SHOP I ANNEX BUILDING NOW AVAILABLE FOR REVIEW AND COMMENT

The Metropolitan Washington Airports Authority (MWAA) is proposing to expand the existing International Arrivals Building at Washington Dulles International Airport. The project includes the site development, site utilities and demolition of an existing building, the Shop I Annex.

As an integral part of the planning for this project, a Draft Environmental Assessment (EA) was prepared to evaluate existing conditions and potential environmental effects. The Draft EA addresses the environmental consequences of the Proposed Action (Build Alternatives) and No Build Alternative, as well as other issues including air quality, water quality, historical, architectural, archaeological and cultural resources, visual impacts and wetlands. The Draft EA was prepared and comments are requested in conformance with the provisions of the National Environmental Policy Act (NEPA).

Beginning, March 30, 2007, copies of the Draft Environmental Assessment are being made available for public review and comment at the following libraries: Eastern Loudoun Regional Library (21030 Whitfield Place Sterling, VA), Rust Library (380 Old Waterford Rd. Leesburg, VA), Centreville Regional Library (14200 St. Germaine Dr. Centreville, VA), Chantilly Regional Library (4000 Stringfellow Rd. Chantilly, VA), Fairfax City Regional Library (3915 Chain Bridge Rd. Fairfax, VA), Reston Regional Library (11925 Bowman Towne Dr. Reston, VA), and Tysons-Pimmit Regional Library (7584 Leesburg Pike Falls Church, VA).

Copies of the draft Environmental Assessment are also available for review, by appointment, at the Federal Aviation Administration Washington Airports District Office, 23723 Air Freight Lane, Dulles, VA, (703) 661-1362, and at the Airport Manager's Office located on the baggage claim level of the Main Terminal at Washington Dulles International Airport (703) 572-2710.

The Draft EA can also be reviewed at www.mwaa.com.

This public review and comment period is also being conducted pursuant to the MWAA's 1987 Programmatic Memorandum of Agreement with the Virginia State Historic Preservation Officer and the Advisory Council on Historic Preservation (as regards Section 106 of the National Historic Preservation Act of 1966 – 36 CFR 800).

For further information, questions or to submit written comments concerning the EA and historic preservation matters please contact:

Office of Communications, MA-10 Metropolitan Washington Airports Authority One Aviation Circle Ronald Reagan Washington National Airport Washington, DC 20001-6000

703-417-8745

The record is open for public comment until 5:00 p.m. on April 30, 2007.

The form on which this document is based is a modification of the Form C developed by FAA Eastern Region dated March 22, 1999. The original form contained references to specific paragraphs of FAA Order 5050.4A. In the modified form, these references were replaced with references to the corresponding paragraphs of FAA Order 5050.4B, which replaced Order 5050.4A effective April 28, 2006, and FAA Order1050.1E.

FAA EASTERN REGIONAIRPORTS DIVISION ENVIRONMENTAL EVALUATION FORM "C" FOR SHORT ENVIRONMENTAL ASSESSMENTS

Environmental Evaluation Form "C," Short Environmental Assessment (EA), is based upon the guidance in Federal Aviation Administration (FAA) Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions For Airport Actions* or subsequent revisions, which incorporates the Council on Environmental Quality's (CEQ) regulations for implementing the National Environmental Policy Act (NEPA), as well as the U.S. Department of Transportation environmental regulations (including FAA Order 1050.1E or subsequent revisions), and many other federal statutes and regulations designed to protect the Nation's natural, historic, cultural, and archeological resources. It was prepared by FAA Eastern Region Airports Division, and is intended to be used for proposed Airports projects in this region only. If you wish to use it for projects in other regions or divisions, you must first coordinate with that region or division to determine whether they approve of its use.

Form C is intended to be used when a project cannot be categorically excluded (CATEX) from formal environmental assessment, but when the environmental impacts of the proposed project are expected to be insignificant and a detailed EA would not be appropriate. Accordingly, Form C is intended to meet the intent of a short EA while satisfying the regulatory requirements of an EA. Proper completion of Form C would allow the FAA to determine whether the proposed airport development project can be processed with a short EA, or whether a more detailed EA must be prepared. FAA normally intends to use a properly completed Form C to support a Finding of No Significant Impact (FONSI).

Applicability

Form C should be used if the sponsor's proposed project meets the following two (2) criteria:

- 1) The proposed project involves conditions ("extraordinary circumstances") identified in Order 5050.4B paragraph 903 (projects normally requiring an EIS); paragraph 702 (projects normally requiring an EA); Table 6-3 (extraordinary circumstances); or paragraph 706.h (cumulative impacts), and the sponsor shall demonstrate that involvement with, or impacts to, the extraordinary circumstances are not notable in number or degree of impact, and that any significant impacts can be mitigated below threshold levels.
- 2) The proposed project must fall under one of the following categories of Federal Airports Program actions noted with an asterisk (*):
 - (a) Approval of an airport location (new airport).
 - *(b) Approval of a project on an airport layout plan (ALP).
 - *(c) Approval of federal funding for airport development.
 - *(d) Requests for conveyance of government land.

- *(e) Approval of release of airport land.
- *(f) Approval of the use of passenger facility charges (PFC).

*(g) Approval of development or construction on a federally obligated airport.

Do any of these listed Federal Airports program action(s), 2(b) - (g), apply to your project?

Yes X No** If "yes," list them here (there can be more than one).

2(b) Approval of a project on an Airport Layout Plan.

2(g) Approval of development or construction on a federally obligated airport

If "no," see (**) below.

** If the proposed project does not meet 1) or 2) above, i.e., one or more answers to the questions resulted in a (**), <u>do not complete this Form</u>. Rather, contact the appropriate official (listed at the end of this form) for additional instructions.

1. Project Location:
Airport Name: Washington Dulles International Airport
Airport Address: P.O. Box 17045, Washington, D.C. 20041-0045

City: _____ County: <u>Loudoun</u> State: <u>Virginia</u>

2. Airport Sponsor Information:

Complete the following information:

Point of Contact: William C. Lebegern, P.E.

Address: Room 155 West Building, Ronald Reagan Washington National Airport

Washington, DC 20001-4901

Telephone: (703) 417-8160 Fax: (703) 417-8199

E-mail: william.lebegern@mwaa.com

3. Evaluation Form Preparer Information:

E-mail: Frank.Cirillo@mwaa.com

4. Proposed Development Action (describe **ALL** associated projects that are involved):

The Metropolitan Washington Airports Authority (the Authority) proposes to expand the International Arrivals Building (IAB) at Washington Dulles International Airport (Figure 1). This project includes the expansion and/or refurbishment of the IAB passenger and basement level. The existing facilities of approximately 190,000 square feet (sf) will be expanded by about 180,000 sf to about 370,000 sf. The project will enlarge the area for passenger queuing in the immigration lobby, increase the number of passport control booths to comply with current Customs and Border Patrol processing requirements and regulations (48 agent positions vs. the existing 38 positions), and provide additional baggage claim devices with a presentation length to assure the optimum baggage holding capacity (1,800 linear feet of total presentation length vs. the existing 960 linear feet). The basement area, used primarily for processing inbound and outbound baggage, will increase from approximately 70,000 sf to approximately 164,000 sf. The Mobile Lounge docks will be relocated from the west side of the existing IAB to the south side of the expanded facility. An underground tunnel connecting the 12-gate expansion in Concourse B with the IAB is proposed as a future option.

The tunnel would be served by an optional sterile corridor system located in the basement of the new 12-gate addition that will link the tunnel to all international gates at this segment of the building.

The expansion will utilize the area to the west and south of the existing IAB containing the footprint of the existing Shop 1 Annex (Building 2409), which would be demolished in the fall of 2007. The IAB Expansion would commence in winter or spring of 2008 and be completed by 2011. Figures 2-4 illustrate the proposed facility's location and appearance. Figure 5 shows the alternative locations.

5. Describe the Purpose of and Need for the Project:

The purpose and need for the International Arrivals Building (IAB) expansion is to address current and future deficiencies, and to improve its ability to handle a larger share of the airport's international market. When the International Arrivals Building was opened in 1991, it had a peak-hour capacity of approximately 2,000 passengers per hour. Changes in passport control procedures in recent years, among other factors, have reduced the peak-hour capacity to 1,000 passengers per hour, well below the 1,600 passengers per peak-hour demand experienced in 2005. By 2011, demand is expected to increase to 1,900 passengers per peak hour.

The capacity of the IAB is governed by any one of the unique processes contained in the international arrival process. In the case of the IAB, despite recent installation of additional passport control booths that have increased processing capacity, deficiencies in the IAB's baggage claim hall—caused by inadequate claim presentation coupled with lack of circulation and waiting space—will continue to constrain the IAB's capacity to approximately 1000 passengers per hour.

Additionally, this project enhances the baggage make-up area by providing additional baggage make-up devices, improved bag tug flows, and better access to the baggage handling area. The expansion project will include demolition and removal of the existing Building 2409, the Shop 1 Annex, to accommodate the footprint and operations of the IAB expansion to the west and south of the existing IAB.

6. Alternatives to the Project: Describe any other reasonable actions that may feasibly substitute for the proposed project, <u>and</u> include a description of the "No Action" alternative. If there are no feasible or reasonable alternatives to the proposed project, explain why:

Expansion of the existing facility was deemed to be the most cost-effective alternative; additionally, it is more viable from a constructability perspective. With minimal impacts to landside and airside operations, expansion of the existing IAB would provide more efficient operations and enhanced passenger convenience. The Authority has invested significant resources to develop the existing facility. To move the IAB function to another site would require a significant investment to recreate the existing facilities at a new location. Saarinen's vision for the Airport included an international arrivals component on the west side of the terminal. Hence, placing this function in any other location would be inconsistent with the original Master Plan.

Expansion of the existing IAB, with various combinations of links to airside facilities, was evaluated. The alternatives were judged and ranked, and in all cases expansion of the existing facility was more economical, led to a shorter implementation time, and had fewer impacts to airside and landside operations. With the expansion of the facility, a more efficient floor plan could be developed to facilitate Customs and Border Protection (CBP) and airline operations, as well as creating a more convenient facility for passenger movements. Likewise, alternatives initially considered for a new IAB or recreating the existing function in another area are cost prohibitive and would have significant impacts to existing Airport operations and facilities.

Alternative #1. East side of the Terminal – Relocating the IAB on the east side of the Terminal in an expanded form. Relocating the existing IAB facility on the east side of the Terminal would require a significant investment to develop a duplicate of the existing facility. See Figure 5. To meet the current and near term demands, the new facility on the east side of the Terminal would need to duplicate the existing 190,000 sf facility and add an additional 180,000 sf of space. Dependent on location and layout of an east-side IAB facility, other facilities/functions located on the east side of the Terminal might need to be demolished and relocated, including the MU2 baggage make-up building and the utility building providing heating and cooling for the Terminal and surrounding buildings. Implementation of this concept would take much longer and cost much more than expanding the existing IAB, due to the difficulty of relocating existing facilities and rerouting important utility lines. The Authority has invested a significant amount of resources in developing the existing facilities. To move the IAB function to another site would require a similar investment inflated to today's dollars to recreate the new facility. Placing the IAB on the east side of the terminal would be inconsistent with the original Master Plan and Saarinen's vision for IAD. Site requirements for constructability and operations as well as major historic concerns are very restrictive when applied to the necessary design configuration. Consequently, this alternative is not currently under active consideration, and it is not investigated further in this EA Form C.

Alternative #2. Between Concourse A/B and the Terminal – Relocating the IAB to between Concourse A/B and the Terminal in an expanded form. See Figure 5. The conceptual design for this alternative would place the new IAB facility below ground between Concourse A/B on the east or west side. Passengers would access the facility via sterile corridors from Concourse B and would exit via a non-secure tunnel leading toward the landside for access to the curb, parking, and other ground transportation. This alternative would replace the existing IAB and require construction of about 370,000 sf of new facilities to meet current and future demand. This concept would have a dramatic impact on airside operations during construction and would cost much more than expanding the existing facility. Implementing this concept would have the added issue of constructing an underground facility in an operating airfield as well as the development of a non-secure tunnel leading from the airside to the landside. As with Alternative 1, the Authority's substantial investment in the existing facility, the high costs of its replacement, and inconsistency with the original Master Plan have caused this alternative to be eliminated from further active consideration in this EA Form C.

<u>Alternative #3.</u> North of the Terminal in the bowl parking area – Below ground facility with a sterile/secure tunnel allowing passengers to move from the airside to the facility on the landside.

An IAB facility located further in the landside portion of the Airport was considered as an alternative to move the center of activity from straddling the airside and landside to a full landside operation.

See Figure 5. This alternative would develop a replacement IAB facility in the bowl parking area

below ground. Passengers would be delivered to the facility via a sterile/secure corridor and would exit the facility directly to landside elements such as parking, curbside, or the ground transportation center. Delivering baggage to the new facility was more problematic than other alternatives and impacts to the landside would be very significant during construction requiring a longer implementation schedule. Relocating this replacement IAB facility would carry an even higher cost than expanding the existing facility as described in Alternatives 2 and 3 above. As with Alternatives 1 and 2, the Authority's substantial investment in the existing facility, the high costs of its replacement, and inconsistency with the original Master Plan have caused this alternative to be eliminated from further active consideration in this EA Form C.

Alternative #4. IAB/International Terminal along cargo building line - Replacement IAB facility northwest of the terminal along the cargo building line. An international concourse would be developed to feed into this new IAB to more efficiently use the site and the new facility. See Figure 5. This option was not deemed in any way consistent other alternatives for comparison. This alternative, without the attached concourse was similar to the east-side alternative (Alternative #1) in that existing facilities/functions would need to be relocated to allow for the new IAB. As with Alternatives 1-3, the Authority's substantial investment in the existing facility, the high costs of its replacement, and inconsistency with the original Master Plan have caused this alternative to be eliminated from further active consideration in this EA Form C.

No Action Alternative. The existing IAB would not adequately accommodate current demand as well as the demand initially planned for the facility. Passengers and air carrier operations would continue to cause congestion. Under the No Action Alternative, the ability of Washington Dulles International Airport to attract additional international flights could be hampered, with potential adverse effects on opportunities and growth in Northern Virginia and the National Capital Region. The No Action Alternative does not meet the purpose and need described in Section 4.

1. Describe the affected environment of the project area (terrain features, level of urbanization, sensitive populations, etc). Attach a map or drawing of the area with the location(s) of the proposed action(s) identified. Attachment? Yes X No For the proposed project, the IAB would remain in its existing location and expand to the west and south as indicated in Figure 3. The project is located completely within the landside area of the airport. There are no sensitive populations within the project area. The nearest schools, daycare centers, or places of public assembly are located outside Washington Dulles International Airport, approximately 1.5 miles or more from the project area. The proposed project is within the Washington Dulles International Airport Historic District, which is eligible for listing on the National Register of Historic Places. Land cover in the affected environment is impervious and developed. The site of the proposed IAB expansion is bounded to the north by the parking garage walkway, to the west by the access road and equipment maneuvering area of the Shop 1 Annex, and to the south by the access road that serves Shop 1. After construction, the space between Shop 1 and the IAB will be wider than what currently exists between Shop 1 and the Shop 1 Annex, resulting in additional maneuvering space in front of the Shop 1 service bays.

2. Are there attachments to this Form? Yes X No If "yes," identify them below. Figure 1. Washington Dulles International Airport (IAD) General Location Map Figure 2. Project Area for IAB Expansion Area and Demolition of Shop 1 Annex, Washington

<u>Dulles International Airport (IAD)</u>

Figure 3. International Arrivals Building (IAB) Site Plan and Associated Projects

Figure 4. Artist's Rendering of International Arrivals Building with Proposed Expansion

Figure 5. Alternatives to International Arrivals Building (IAB)

Attachment A. Excerpt from Minutes of February 14, 2006 Meeting Between the Metropolitan Washington Airports Authority and the Virginia Department of Historic Resources

Attachment B. Technical Memorandum, Shop 1 Annex Building, by Mike McCarty [Parsons Management Consultants], April 17, 2006

Attachment C. E-Mail from Henry Ward to Marc Holma Concerning Additional Modifications to West Service Buildings, February 28, 2007

Attachment D. Proposed Memorandum of Agreement between the Virginia State Historic Preservation Office and the Metropolitan Washington Airports Authority

9. Environmental Consequences – Special Impact Categories (refer to corresponding sections in 5050.4A, or subsequent revisions, for more information and direction to complete each category, including discussions of Thresholds of Significance).

(1) NOISE

- 1) Does the proposal require a noise analysis per Order 5050.4A? Explain. (Note: Noise sensitive land uses are defined in Table 1 of FAR Part 150). Yes _____ No _X_ The proposed project is not expected to result in an increase in airport operations (types and number of aircraft used, runway layout, and runway utilization). Construction noise will be temporary, localized, and a minor increment to the existing noise of aircraft and vehicle operations in the vicinity. Therefore, no noise impacts are expected to occur as a direct result of the implementation of the proposed project.
- 2) If "yes," determine whether the proposed project is likely to have a significant impact on noise levels over noise sensitive areas within the DNL 65 dBA noise contour. Not Applicable.

(2) COMPATIBLE LAND USE

- (a) Would the proposed project result in other (besides noise) impacts exceeding thresholds of significance that have land use ramifications, such as disruption of communities, relocation of residences or businesses, or impact natural resource areas? Explain.
- No. Since the proposed project involves construction located entirely within the airport proper, the project will not result in the relocation of residences and businesses or disrupt established communities or planned development. The proposed project is consistent with the plans noted in Item 21(c) below
- (b) Would the proposed project be located near or create a wildlife hazard as defined in FAA Advisory Circular 150/5200-33, "Wildlife Hazards on and Near Airports"? Explain.

 No.__

(3) SOCIAL IMPACTS

(a) Would the proposed project cause relocation of any homes or businesses? Yes____ No __X Explain. See Section 2(a) above____

- (b) If "yes," describe the availability of adequate relocation facilities Not Applicable.
- (c) Would the proposed project cause an alteration in surface traffic patterns, or cause a noticeable increase in surface traffic congestion? Explain.

No. Traffic is not expected to increase as a result of the proposed project. The proposed project is intended to expand the existing facility to ease current congestion and enhance services provided at the airport. There may be temporary construction traffic impacts as described in section (20) below.

(4) INDUCED SOCIOECONOMIC IMPACTS

Would the proposed project cause induced, or secondary, socioeconomic impacts to surrounding communities, such as change business and economic activity in a community; impact public service demands; induce shifts in population movement and growth, etc.? Yes___ No \underline{X} _ Explain See section (3) above.

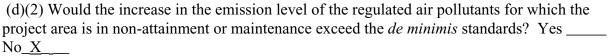
(5) AIR QUALITY

- (a) Does the proposed project have the potential to increase airside or landside capacity, including an increase in capacity to handle surface vehicles? Explain <u>Yes. The project will increase landside capacity of the IAB, but no increase in operational air pollutant emissions is expected beyond those forecast in the Final Environmental Impact Statement for New Runways, Terminal Facilities and Related Facilities at Washington Dulles International Airport (FAA 2005). Air emissions sources at the airport include stationary sources such as heating equipment and emergency generators and mobile sources such as mobile lounges and other vehicular traffic. Air emissions will be within the air quality permit limitations.</u>
- (b) Identify whether the project area is in a non-attainment or maintenance area for any of the six (6) criteria air pollutants having National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act Amendments (CAAA), and identify which pollutant(s) apply. If the proposed project is in an attainment area, no further air quality analysis is needed; skip to item (6). See EPA Green Book at www.epa.gov/oar/oagps/greenbk for current attainment areas. The Virginia Department of Environmental Quality (VDEQ) implements the federal and state air quality programs in the state. The federal program was established under the authority of the federal Clean Air Act (CAA), as amended. Under the CAA, National Ambient Air Quality Standards (NAAOS) have been established for six criteria pollutants: ozone (O₃), nitrogen oxides (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO), lead (Pb), and particulate matter (PM). Areas that are not in compliance with a criteria pollutant standard are defined as being in nonattainment for that pollutant. Loudoun County (the Washington Metropolitan area), where the airport is located, is currently in attainment for all criteria pollutants except ozone and PM. The Washington Metropolitan area is classified as moderate nonattainment for the new 8-hr ozone standard (0.08 ppm), and as nonattainment for fine particulate matter (PM_{2.5}, particles smaller than 2.5 microns) for which the standard is 35 micrograms per cubic meter as a 24-hr average, or 15 micrograms per cubic meter as an annual average. The Metropolitan Washington Council of Governments is preparing State Implementation Plans for both ozone and PM_{2.5}.

Actions to be taken by the Virginia Department of Environmental Quality to reduce pollution to levels at or below the NAAQS are outlined in a CAA-mandated State Implementation Plan (SIP) (FEIS for New Runways, FAA, 2005).

(c) Is an air quality analysis needed with regard to indirect source review requirements or levels of aircraft activity (See Order 5050.4B and the 1997 FAA Handbook "Air Quality Procedures for Civilian Airports and Air Force Bases"). Explain. If "yes," comply with state requirements. No.

(d)(1) Would the proposed action be an "exempted action," as defined in 40 C.F.R Part 51.853(c)(2) of the General Conformity Rule? If exempt, skip to item (6). List exemption claimed. The proposed action would not be an "exempted action."



Actions for which the emission levels are less than the *de minimis* levels established by EPA are presumed to be in conformity with applicable SIPs. The *de minimis* levels for NOx and VOC are 100 tons/yr and 50 tons/yr, respectively. Although a SIP for PM_{2.5} has not been completed for the Washington Metropolitan non-attainment area, EPA has established a *de minimis* level of 100 tons/yr for PM_{2.5}.

The proposed IAB Expansion facility will include an emergency backup generator powered by diesel, propane, or natural gas fuel. Combustion emissions would occur from the backup power generator, a nonmajor stationary source. These emissions would primarily be CO, oxides of nitrogen, and sulfur dioxide. The estimated total annual time of operation would be less than 100 hours. Because of this infrequent use and small size of the engine generator, the engine generator would produce negligible air emissions. The emissions from the backup power generator would be below the *de minimis* level, and would not lead to a violation of air quality standards. Prevention of Significant Deterioration (PSD) Regulations, 40 CFR 52.21, define air quality levels that cannot be exceeded by major stationary sources. The emergency backup generator would not be a major stationary emission source; therefore the generator would not be subject to PSD review. Given the type of generator that may be installed, infrequent use, and small size, the engine generator would produce negligible air emissions well below de minimis limits and therefore would not require a conformity determination under Section 176(c) of the Clean Air Act, as amended. Depending on the bhp rating and amount of hours used, the generator may have to be added to the air quality permit for Washington Dulles International Airport.

During dry weather periods, fugitive dust could be generated during site preparation. In addition to being temporary, any impacts from fugitive dust would be negligible because of the small area that would be disturbed. Construction equipment emissions are estimated to be 83 tons of NOx and 9.3 tons of VOC over a 2.6-year period. These levels are well below the *de minimis* levels for these pollutants. The PM emissions for this proposed project are estimated to be 10.28 tons over a 2.6 years construction period; this represents an emission rate of 3.98 tons/year. Even if the emitted PM is presumed to consist entirely of PM_{2.5}, the emission rate is well below the corresponding *de minimis* level of 100 tons/yr.

Construction and operation of the proposed project would result in negligible or no adverse impacts to ambient air quality in the airport vicinity.

(d)(3) If "no," would the proposed project cause a violation of any NAAQS, delay the attainment of any NAAQS, or worsen any existing NAAQS violation? Explain.

N/A.

(d)(4) Would the proposed project conform to the State Implementation Plan (SIP) approved by the state air quality resource agency? Explain, and provide supporting documentation. Emissions that would result from the proposed construction and operation activities will be below the *de minimis* level and in conformity with the SIP. See (a), (b), (c) & (d) above.

(6) WATER QUALITY

Describe the potential of the proposed project to impact water quality, including ground water, surface water bodies, any public water supply systems, etc. Provide documentation of consultation with agencies having jurisdiction over such water bodies, as applicable.

Impacts on water quality from construction and post-construction runoff from the International Arrivals Building are not expected to be significant or adverse. All construction and subsequent operational activities will be under restrictions identified in the Airport's Virginia Pollutant Discharge Elimination System (VPDES) stormwater discharge permit, as well as pertinent State guidance such as the Northern Virginia Best Management Practices (BMPs) Handbook and Virginia Stormwater Management Handbook. In addition to the management of stormwater runoff, the construction project will be required to have an individual erosion and sediment control plan reviewed and approved by the Authority's Building Codes/Environmental Department.

(7) DEPARTMENT OF TRANSPORTATION SECTION 303/4(f)

Does the proposed project require the use of any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or land of an historic site of national, state, or local significance? Provide justification for your response. Include concurrence of appropriate officials having jurisdiction over such land regarding the use determination.

Yes. Because the project is on-airport, there are no parks, recreation areas or wildlife or waterfowl refuges subject to section 303/4(f) of the Department of Transportation Act directly or indirectly affected by this project. However the project is located within the National Register Eligible Washington Dulles International Airport Historic District and may have an adverse effect on the historic district (see Section 8 below).

(8) HISTORIC, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES

(a) Describe any impact the proposed project might have on any properties in or eligible for inclusion in the National Register of Historic Places. Provide justification for your response, and include a record of your consultation with the State Historic Preservation Officer (SHPO), if applicable (attach correspondence with SHPO).

With the transfer of DCA and IAD from FAA to MWAA, MWAA became responsible for the identification, evaluation and protection of historic and archaeological resources contained on those properties. This responsibility is framed in a 1978 Programmatic Memorandum of Agreement (PMOA) between the FAA, the Virginia State Historic Preservation Officer (VASHPO) and the Federal Advisory Council on Historic Preservation (ACHP). Subsequently, an official determination was made that IAD contained a complex of historically significant buildings, structures, and site features, including the Saarinen Terminal, which was eligible for listing in the National Register of Historic Places. The 1978 PMOA, as well as other subsequent consultation and agreements lay out guidelines and procedures that must be followed whenever a project has a potential to affect historical/archaeological resources of the airport property. Projects such as the IAB Expansion that will require construction, demolition, removal or alteration or rehabilitation of historic structures will require formal historic preservation consultation and the execution of a supplementary MOA. Construction activities, including both renovation and new projects affecting the historic character of the airport property must be completed according to the provisions of the Secretary of Interior Standards for the treatment of Historic Properties.

The proposed project requires the demolition of the existing Shop 1 Annex, which has a legacy as the airport's original Aircraft Rescue and Fire Fighting (ARFF) facility. In addition, demolition and construction activity will block the east doors of the Shop 1 Building, requiring that doors on the west side of the Shop 1 Building be expanded vertically to allow servicing of mobile lounges and other large vehicles. As original Saarinen designed West Service Buildings, the Shop 1 Building and the Shop 1 Annex Building have been identified as contributing elements of the National Register-eligible Dulles Airport Historic District. The Authority has determined that the removal of the building, and alteration of the architectural character of the West Service Building complex, would have the potential to cause an adverse effect, but that the visual impact to the Main Terminal forecourt and approach roadways would be limited by the location of the project behind the terminal approach ramps.

Although the majority of the expansion work will occur below the level of the existing roadway ramps and structural plinth, the expansion plan does include elements that may represent significant changes to the exterior appearance of the IAB. Although the IAB itself is not considered an historic property, these changes will occur in the center of the historic district, directly adjacent to the main terminal. As a result, the potential impact of the proposed exterior design on the historic architectural character of the Main Terminal and surrounding historic district needs to be considered. The fact that the proposed design takes into account and is consistent with the surrounding Saarinen-built environment mitigates potential adverse affect of the changes to the IAB proper. As the IAB is physically separated from the Main Terminal, there is some additional architectural leeway.

The Airports Authority has initiated consultation with the Virginia State Historic Preservation Officer as documented in the minutes of a February 14, 2006 meeting (Attachment A). During that meeting the Authority was asked to consider the possibility of (1) relocating the Shop 1 Annex building out of the impact area of the IAB expansion, (2) relocating the Shop 1 Annex Building to a new location on the airport, and (3) salvaging the original exterior metal panels for reuse as replacement panels on other original structures. These measures were evaluated and found not to be viable because of the condition of the building (Attachment B).

Although the preceding steps are not viable, the Authority agrees to carry out recordation by VDHR Intensive Survey Form, as suggested by Mr. Holma in the above meeting minutes from February 14, 2006 as a condition of completing Section 106 requirements.

Further consultation with the VASHPO regarding the modifications to the west doors of the Shop 1 Building occurred in February 2007, as indicated in the email provided in Appendix C While the minor modification of the western door openings will alter door transoms that appear to be original structural elements of the building, the doors that will be vertically enlarged are not original and the visual impact of the modifications will be minor. As mitigation for the potential effects on historic properties, the Authority has proposed the measures set forth in a draft Memorandum of Agreement with the Virginia SHPO (Attachment D).

All other design characteristics of the IAB Expansion will be in compliance with the Authority Design Manual 'Historic Compliance' guidelines, and blended into the correct design context from the original Saarinen design elements original to the surrounding airport design (page 25, Authority Design Manual, 2006).

(b) Describe whether there is reason to believe that significant scientific, prehistoric, historic, archeological, or paleontological resources would be lost or destroyed as a result of the proposed project. Include a record of consultation with persons or organizations with relevant expertise, including the SHPO, if applicable.

Because of prior disturbance of the project site, there are no intact archaeological resources that could be affected.

(9) BIOTIC COMMUNITIES

Describe the potential of the proposed project to directly or indirectly impact plant communities and/or the displacement of wildlife. This answer should also reference Section 6, Water Quality, if jurisdictional water bodies are present. None

(10) FEDERAL and STATE-LISTED ENDANGERED AND THREATENED SPECIES

Would the proposed project impact any federally- or state-listed or proposed endangered or threatened species of flora and fauna, or impact critical habitat? Explain, and discuss and attach records of consultation efforts with jurisdictional agencies, if applicable.

Three species, the upland sandpiper (VA State threatened species), the hairy beardtongue and marsh hedgenettle (both designated very rare by the Virginia Natural Heritage Program) have been either observed or documented at or near IAD. Activities from the implementation of the proposed project will occur within the built-up airport terminal area, which is well out of range of these species. The proposed action will not have an impact on any known or suspected threatened or endangered species or critical habitat.

(11) WETLANDS

Does the proposed project involve the modification of delineated wetlands (wetlands must be delineated using methods in the US Army Corps of Engineers (ACE) 1987 Wetland Delineation Manual; delineations must be performed by a person certified in wetlands delineation). Provide justification for your response.

No. There are no wetlands present at the project site. Neither the proposed action no the No-Build alternative will affect wetlands.

(a) Would the proposed project be located in, or would it encroach upon, any 100-year floodplains, as designated by the Federal Emergency Management Agency (FEMA)? Yes
No_X
(b) Would the proposed project be located in a 500-year floodplain, as designated by FEMA? Yes No_X_
(c) If "yes," is the proposed project considered a "critical action", as defined in the Water Resources Council Floodplain Management Guidelines? (see <u>FR</u> Vol. 43, No. 29, 2/10/78) Yes No Not Applicable.
(d) You must attach the corresponding FEMA Flood Insurance Rate Map (FIRM) or other documentation showing the project area. Map attached? Yes X See Figure 2 No If "no," why not?
(e) If the proposed project would cause an encroachment of a base floodplain (the base floodplain is the 100-year floodplain for non-critical actions and the 500-year floodplain for critical actions), what measures would be taken to provide an opportunity for early public review, in accordance with Order 5050.4B Table 7-1 and Order 1050.1E paragraphs 9.2c and

(13) COASTAL ZONE MANAGEMENT PROGRAM

- (a) Would the proposed project occur in, or affect, a coastal zone, as defined by a state's Coastal Zone Management Plan (CZMP)? Explain_No_The proposed project is located in Loudoun County, outside of the state-designated coastal zone.
- (b) If "yes," is the project consistent with the State's CZMP? Explain. If applicable, attach the sponsor's consistency certification and the state's concurrence of that certification. Early coordination is recommended. Not Applicable.

(14) COASTAL BARRIERS

9.2g? Not applicable.

Is the location of the proposed project within the Coastal Barrier Resources System, as delineated by the US Fish and Wildlife Service (FWS) or FEMA coastal barrier maps? Explain. _No.__

(15) WILD AND SCENIC RIVERS

Would the proposed project affect any portion of the free-flowing characteristics of a Wild and Scenic River or a Study River, or any adjacent areas that are part of such rivers, listed on the

Wild and Scenic Rivers Inventory? Consult the (regional) National Parks Service (NPS), U.S. Forest Service (FS), or other appropriate federal authority for information. Early consultation is recommended. No

(16) FARMLAND

- (a) Would the proposed project involve the use of federal financial assistance or conversion of federal government land? Explain No.
- (b) If "yes" would it convert farmland protected by the Farmland Protection Policy Act (FPPA) (prime or unique farmland) to non-agricultural uses? Yes_____ No____ Not Applicable.
- (c) If "yes," determine the extent of project-related farmland impacts by completing (and submitting to the Natural Resources Conservation Service) the "Farmland Conversion Impact Rating Form" (NRCS Form AD 1006). Coordinate with the state or local agricultural authorities. Explain your response, and attach the Form AD 1006, if applicable. Not Applicable.

(17) ENERGY SUPPLY AND NATURAL RESOURCES

What effect would the proposed project have on energy or other natural resource consumption? Would demand exceed supply? Explain. Letters from local public utilities and suppliers regarding their abilities to provide energy and resources needed for large projects may be necessary.

The proposed expansion of the IAB will require additional energy use to provide water, heating, air conditioning, and electricity. However, no additional central heating and cooling equipment capacity (i.e. from chillers or boilers) will be required since the existing airport Boiler/Chiller Plant has sufficient excess capacity to accommodate the increased load. Overall, the additional energy consumption required by the proposed IAB expansion will not be a significant percent of total airport energy use, and current energy suppliers can meet the additional demand.

Dominion Virginia Power supplies electricity; natural gas is supplied by

Commonwealth/Columbia Gas of Virginia, which is a unit of NiSource Inc. These commercial energy companies are the main suppliers of electricity and natural gas to northern Virginia customers, and there would be no problem meeting this modest energy increase.

(18) LIGHT EMISSIONS

Would the proposed project have the potential for airport-related lighting impacts on nearby residents? Explain, and, if necessary, provide a map depicting the location of residences in the airport vicinity in relation to the proposed lighting system. <u>No.</u>

(19) SOLID WASTE

Would the proposed project generate solid waste? Yes <u>X</u> No____ (a)If "yes," are local disposal facilities capable of handling the additional volumes of waste resulting from the project? Explain.

Airport activities currently generate and collect municipal solid waste and hazardous wastes. Construction activities will generate solid waste as well as some fill material. During construction, dumpsters will be located in construction areas for proper onsite management of construction-generated waste. A contracted solid waste disposal company will haul the materials offsite for either land filling or by_another appropriate disposal method. Once the proposed project is completed municipal solid waste will continue to be collected for proper

disposal by the existing airport services.

<u>NOTE</u>: A sanitary landfill is incompatible with airport operations if the landfill is located within 10,000 feet of a runway serving turbo-powered aircraft, or 5,000 feet of a runway serving piston-powered aircraft. Refer to FAA Advisory Circular 150/5200.33 " Hazardous Wildlife Attractants on or Near Airports," and FAA Order 5200.5B, "Guidance Concerning Sanitary Landfills on or Near Airports."

(20) CONSTRUCTION IMPACTS

Would construction of the proposed project: 1) increase ambient noise levels due to equipment operation; 2) degrade local air quality due to dust, equipment exhausts and burning debris; 3) deteriorate water quality when erosion and pollutant runoff occur; 4) or disrupt off-site and local traffic patterns? Explain.

- 1) Noise impacts are expected, but noise impacts are generally localized at the vicinity of the construction site. Construction equipment and vehicles will create localized increases in noise levels, but these temporary noise impacts will not disrupt normal airport operations.

 Noise levels generally dissipate as distance from their origin increases. Distance from the construction site must be considered when evaluating potential noise impacts to land uses adjacent to or nearby the construction areas. All proposed construction activities will take place inside the airport boundary. Overall, the construction phase of this project is expected to create minor and temporary impacts at the project site and in the surrounding area. These impacts will be short-term in nature, lasting for the duration of construction activities. Temporary contractor staging areas will be required throughout the construction process to store and assemble construction equipment and materials.
- 2) Air quality degradation is not expected. Emissions related to construction activities will be temporary and limited to the duration of the proposed project. The State Implementation Plan (SIP) includes an allowance for construction emissions region-wide. Dust control is important for airport construction activities since light reflecting off of dust particles at night may jeopardize aircraft safety. Best Management Practices (BMPs) will be used to keep this to a minimum.
- 3) If uncontrolled, construction activities have the potential to cause erosion and sedimentation that can impact water quality. Erosion control measures required by the Authority Design Manual (2006) will be implemented to minimize offsite transport of soils from the construction areas. The Department of Conservation and Recreation (DCR) published the *Virginia Erosion and Sediment Control Handbook* (Third Edition, 1992) to provide guidance for all state erosion and sediment control programs. It covers basic concepts, design measures, installation, maintenance, plan review procedures and administrative guidelines to support compliance with the Virginia Erosion and Sediment Control Law and regulations. The project will be built with the appropriate erosion and sediment control plans consistent with State Erosion and Sediment Control Law. Contractors will be required to provide an erosion and sediment control plan that complies with the Virginia Erosion and Sediment Control Law and regulations, including the *Virginia Erosion and Sediment Control Handbook*.
- 4) No changes in the level of service of area roads would result. According to MWAA Design Manual Section 2.14 AIRPORT OPERATIONS DURING CONSTRUCTION, paragraph 2.14.1, the authority must safely conduct airport operations during the construction phase of the project. The project will be designed to consider passenger check-in, security screening, passenger departures, and passenger arrivals. The design will consider the continued operational needs of Airport Operations, airlines tenants, and concessionaires. Additionally it will ensure the continuity of services, maintenance of vehicular access, maintenance of pedestrian access,

and security and safety requirements. During the construction period, construction-related vehicles will be traversing the airport access roads and internal roadways to deliver materials and equipment and to transport construction workers to their job sites. Large or bulky construction equipment that is slow moving could temporarily congest roadway traffic. This congestion is likely to be intermittent and infrequent. This increase in roadway use will be managed to avoid impact to normal airport operations. The access roads and internal roadways may experience a slight increase in traffic volume; the increase should be easily accommodated on the existing roadways. The Authority will incorporate the provisions of Advisory Circular (AC) 150/5370-10A, standards for Specifying Construction of Airports, into the project specifications. This AC provides information to reduce airport-related construction impacts.

(21) OTHER CONSIDERATIONS

- (a) Is the proposed project likely to be highly controversial on environmental grounds? Explain. No. See Section 11.
- (b) Is the proposed project likely to be inconsistent with any federal, state or local law or administrative determination relating to the environment? Explain._No_
- (c) Is the proposed project reasonably consistent with plans, goals, policies, or controls that have been adopted for the area in which the airport is located? Explain. Yes. The proposed project is consistent with the following:
- Federal Aviation Administration (FAA) Metropolitan Washington Airports. *Master Plan Update Washington Dulles International Airport*. Final Technical Report. Prepared by: Peat, Marwick, Mitchell & Co. September 1985.
- Metropolitan Washington Airports Authority, *Addendum, Part 150 Noise Compatibility Program*, Washington Dulles International Airport, 1993.
- Metropolitan Washington Airports Authority (MWAA), Consolidated Pollution Prevention Plan, Washington Dulles International Airport. Prepared by URS Corporation, Bethesda, MD. 2002.
- Metropolitan Washington Airports Authority (MWAA), *Programmatic Memorandum of Agreement Among the Advisory Council on Historic Preservation*, the Virginia State Historic Preservation Officer, and the Federal Aviation Administration Metropolitan Washington Airports. 1987
- Metropolitan Washington Airports Authority (MWAA) Stormwater Pollution Prevention Plan, Washington Dulles International Airport. Prepared by Earth Tech, Inc, Alexandria, VA and revised by Dames & Moore, Inc. Bethesda, MD. January 2000.

Metropolitan Washington Council of Governments, Plan to Improve Air Quality in the Washington, DC-MD-VA Region, State Implementation Plan (SIP) ("Severe Area SIP") for Washington, DC-MD-VA Ozone Nonattainment Area, Publication Number: 20047177, February 19, 2004

(22) HAZARDOUS SITES/MATERIALS

Would the proposed project require the use of land that may contain hazardous substances or may be contaminated? Explain your response and describe how such land was evaluated for hazardous substance contamination. Early consultation with appropriate expertise agencies (e.g., US Environmental Protection Agency (EPA), EPA-certified state and local governments) is recommended. The land for the footprint of the IAB Expansion has been previously disturbed with a variety of aviation-related activities. Any hazardous material encountered throughout project activities will be disposed of in accordance with applicable laws and regulations.

(23) PERMITS

List all required permits for the proposed project. Indicate whether any difficulties are anticipated in obtaining the required permits. <u>Add backup generator to the air quality permit:</u> No Difficulty, see section (5)(b), Erosion and sediment control plan reviewed and approved by the Authority's Building Codes/Environmental Department: No Difficulty, see item (6).

NOTE: Even though the airport sponsor has/shall obtain one or more permits from the appropriate federal, state, and/or local agencies for the proposed project, initiation of such project shall NOT be approved until FAA has issued its environmental determination.

(24) ENVIRONMENTAL JUSTICE

Would the proposed project impact minority and/or low-income populations? Consider human health, social, economic, and environmental issues in your evaluation. Explain. <u>No.</u>

(25) CUMULATIVE IMPACTS

When considered together with other past, present, and reasonably foreseeable future development projects on or off the airport, federal or non-federal, would the proposed project produce a cumulative effect on any of the environmental impact categories above? You should consider projects that are connected, cumulative and similar (common timing and geography). Provide a list of such projects considered. For purposes of this Evaluation Form, generally use 3 years for past projects and 5 years for future foreseeable projects.

No. Cumulative impacts are substantive changes in the environment that would result from implementation of the proposed project and other development projects in the vicinity. The Authority plans to continue implementation of the following projects in the vicinity of the proposed IAB Expansion: *Modifications to the West Baggage Basement* to install a permanent In-Line Explosion Detection System (EDS): Installation of an in-line EDS potentially impacts the baggage recheck operation for international passengers connecting to other flights by removing the TSA baggage inspection area from the airline recheck lobby. While the proposed project does not include such modifications, the design should consider future implications to the exit flow from the facility as well as implications to the baggage basement rooms. *Automated People Mover (APM):* The location for the Mobile Lounge docks will require coordination with the APM construction plans in the area immediately south of the IAB. Currently plans call for the APM project to remove a temporary ramp and immediately construct a permanent ramp that facilitates future construction of the West Z-Gates and a service road to the Main Terminal Mobile Lounge docks. The designer may be asked to explore options for this

ramp to remain a permanent configuration, designed to pass under the West Z-Gate facility. West Z-Gate Expansion: Construction of the West Z-Gate will require the relocation of the IAB's temporary Mobile Lounge Docks into their permanent location and coordination of the temporary tug ramp to the West and Southwest Baggage Basements.

<u>Southwest Baggage Basement</u>: The design of the IAB will coordinate the alignment of the new tug ramp accessing the new international inbound baggage basement with the latest plans for the main tug ramp proposed for the southwest baggage basement.

Sterile Tunnel from Concourse B to the IAB and Modifications to Concourse B: As international traffic demand increases, and with the desire to remove mobile lounge activity from the airfield, implementing a sterile tunnel connection between the IAB and Concourse B could improve levels of service to select concourse gates. To allow passengers to walk from Concourse B to the IAB via the sterile tunnel, modifications would be required for Concourse B. Although neither project has been officially adopted, they remain attractive options for the future.

Construction and operation of the IAB Expansion could cause environmental effects that would add to the expected environmental impacts of other development projects in that area of the Washington Dulles International Airport. Cumulative effects that may occur include increased air emissions from vehicles, higher noise levels, and additional vehicular traffic. The IAB Expansion project, including the demolition of the Shop 1 Annex would generate air emissions from use of vehicles and equipment at the site during construction and from use of vehicles to operate and maintain the IAB expansion. Compared with air emissions from vehicle use in the vicinity, the IAB Expansion project would generate a minimal contribution to the current and expected amount of air pollutants from other development. The cumulative impact on air quality would be not be significant and would not result in violation of NAAOS. During construction of the IAB Expansion, noise levels would temporarily increase in the vicinity of the site. Similarly, construction traffic would add to existing traffic volumes on the airport roads. Construction traffic generated by the project would be minor compared with existing traffic levels in the area and to traffic volumes generated by other development. Cumulative noise and traffic impacts from development of the IAB Expansion would not be significant and would amount to only a small portion of the increase in noise and traffic of development. Construction and operation of the IAB Expansion project would not result in significant cumulative effects on the environment.

10. MITIGATION

(a) Describe those mitigation measures to be taken to avoid creation of significant impacts to a particular resource as a result of the proposed project, and include a discussion of any impacts that cannot be mitigated, or that cannot be mitigated below the threshold of significance (TOS) (See Order 5050.4B).

See Section 10(b)

(b) Provide a description of the resources that are in or adjacent to the project area that must be avoided during construction. **Note:** The mitigation measures should be incorporated into the project's design documents.

Water Quality: Construction activities will follow the *Northern Virginia Best Management Practices (BMPs) Handbook* and *Virginia Stormwater Management Handbook*. In addition to

the management of stormwater runoff, the construction project will be required to have an individual erosion and sediment control plan reviewed and approved by the Authority's Building Codes/Environmental Department. Erosion control measures required by the Authority Design Manual (2006) will be implemented to minimize offsite transport of soils from the construction areas. The Department of Conservation and Recreation (DCR) published the *Virginia Erosion and Sediment Control Handbook* (Third Edition, 1992) to provide guidance for all state erosion and sediment control programs. The project will be built with the appropriate erosion and sediment control plans consistent with State Erosion and Sediment Control Law. Contractors will be required to provide an erosion and sediment control plan that complies with the Virginia Erosion and Sediment Control Law and regulations, including the *Virginia Erosion and Sediment Control Handbook*.

Historic Resources: The Authority will carry out recordation of the existing Shop 1 Annex (to be demolished) using the VDHR Intensive Survey Form. Design characteristics of the IAB expansion will be in compliance with the Authority Design Manual 'Historic Compliance' guidelines, and blended into the correct design context from the original Saarinen design elements original to the surrounding airport design. (page 25, Authority Design Manual, 2006). Solid Waste: During construction, dumpsters will be located in construction areas for proper onsite management of construction-generated waste. A contracted solid waste disposal company will haul the materials offsite for either land filling or by another appropriate disposal method.

Air Quality: Dust control is important for airport construction activities since light reflecting off of dust particles at night may jeopardize aircraft safety. Best Management Practices (BMPs) will be used to keep this to a minimum.

Traffic Flow: According to MWAA Design Manual Section 2.14 AIRPORT OPERATIONS DURING CONSTRUCTION, paragraph 2.14.1, the Authority must safely conduct airport operations during the construction phase of the project. The Authority will incorporate the provisions of Advisory Circular (AC) 150/5370-10A, standards for Specifying Construction of Airports, into the project specifications. This AC provides information to reduce airport-related construction impacts.

<u>Hazardous Materials</u>: Any hazardous material encountered throughout project activities will be <u>disposed of in accordance with applicable laws and regulations</u>.

11. PUBLIC INVOLVEMENT

Describe what efforts would be made to involve the public with this proposed project. Discuss the appropriateness of holding public meetings and/or public hearings, making the draft document available for public comment, or the preparation of a public involvement plan, etc. The public will be informed of the proposed project through notification availability of the EA for review and a public comment period. Impacts to historic resources are being addressed through the Authority's established procedures with the Virginia State Historic Preservation Officer.

References:

Federal Aviation Administration, Final Environmental Impact Statement for New Runways, Terminal Facilities and Related Facilities at Washington Dulles International Airport, 2005.

McCarty, Michael. Memorandum, NEPA Documentation-Shop 1 Annex, Parsons Management Consultants, April 17, 2006.

- Metropolitan Washington Airports Authority (MWAA), Airport Environmental Planning Manual, January, 2006
- Metropolitan Washington Airports Authority (MWAA). Design Manual, Ronald Reagan Washington National Airport and Washington Dulles International Airport, 2006.
- Metropolitan Washington Airports Authority (MWAA). International Arrivals Building Expansion: Enabling Projects Relocation Study for MA-120, 225, 226, 630 and 610, Washington Dulles International Airport, March 20, 2006
- Metropolitan Washington Airports Authority (MWAA). International Arrivals Building Expansion Project Definition Document (PDD), April 5, 2006

a

12. PREPARER CERTIFICATION I certify that the information thave provided above is, to the best of my knowledge, correct. Signature Mnch 20, 2007 Date		
Francis A. Cirillo, Jr., Manager, Program Planning Name, Title		
Parsons Management Consultants/Metropolitan Washington Airports Authority Affiliation		
13. AIRPORT SPONSOR CERTIFICATION I certify that the information I have provided above is, to the best of my knowledge, correct. I also recognize and agree that no construction activity, including but not limited to site preparation, demolition, or land disturbance, shall proceed for the above proposed project(s) until FAA issues a final environmental decision for the proposed project(s), and until compliance with all other applicable FAA approval actions (e.g., ALP approval, airspace approval, grant approval) has occurred.		
Signature March 22, 2007 Date		
Frank D. Holly Jr., Vice President for Engineering_ Name, Title		

Note: This page to be completed by FAA only

14. FAA DECISION:

Having reviewed the above information, certified by the responsible airport official, it is the FAA decision that the proposed project(s) of development warrants environmental processing as indicated below.

	The proposed development action has been found to qualify for a Short Environmental Assessment .		
	The proposed development action exhibits conditions that require the preparation of a detailed <u>Environmental Assessment</u> (EA).		
	The following additional documentation is necessary for FAA to perform a complent environmental evaluation of the proposed project:		
* <u>Action Revi</u>	iewed/Recommended by:		
	(FAA Environmental Specialist)	Date	
* A 4. *			
*Approved:	(FAA Approving Official)	Date	

The above FAA approval only signifies that the proposed development action(s), as described by the information provided in this Evaluation Form, initially appears to qualify for the indicated environmental processing action. This may be subject to change after more detailed information is made known to the FAA by further analysis, or though additional federal, state, local or public input, etc.

FIGURES

- Figure 1. Washington Dulles International Airport (IAD) General Location Map
- **Figure 2**. Project Area for IAB Expansion Area and Demolition of Shop 1 Annex, Washington Dulles International Airport (IAD)
- Figure 3. International Arrivals Building (IAB) Site Plan and Associated Projects
- Figure 4. Artist's Rendering of International Arrivals Building with Proposed Expansion
- **Figure 5.** Alternatives to International Arrivals Building (IAB)

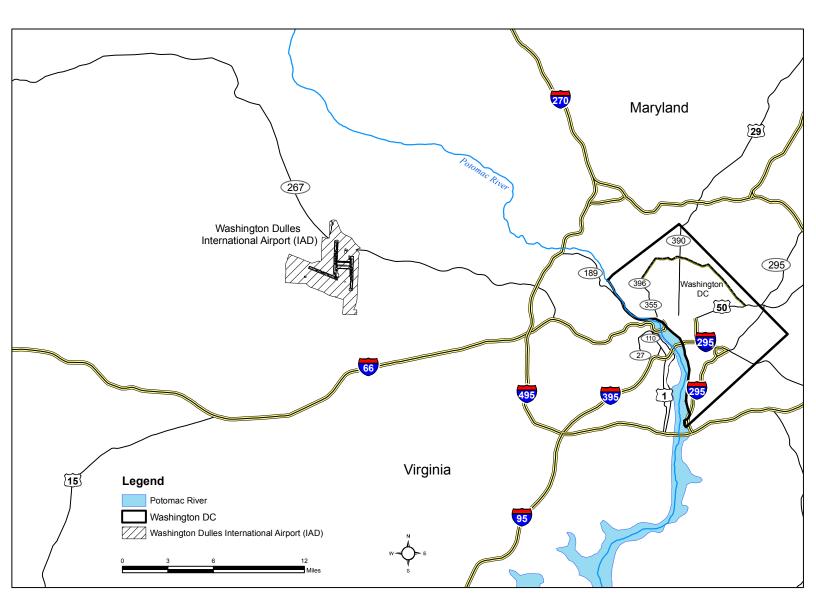


Figure 1. Washington Dulles International Airport (IAD) General Location Map

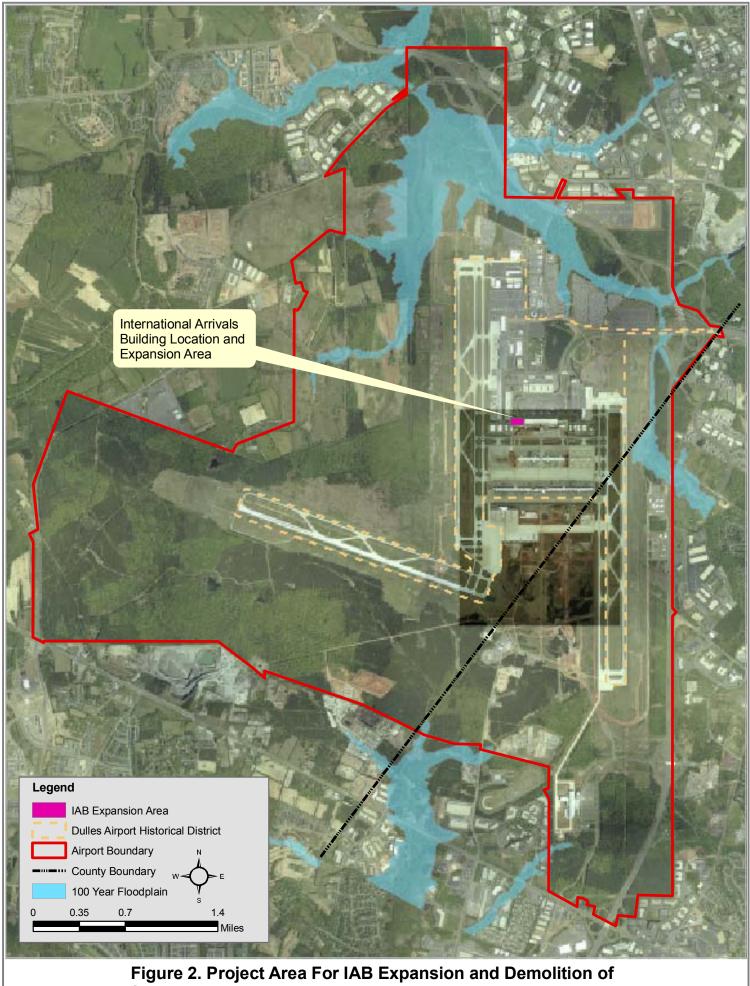


Figure 2. Project Area For IAB Expansion and Demolition of Shop 1 Annex, Washington Dulles International Airport (IAD)

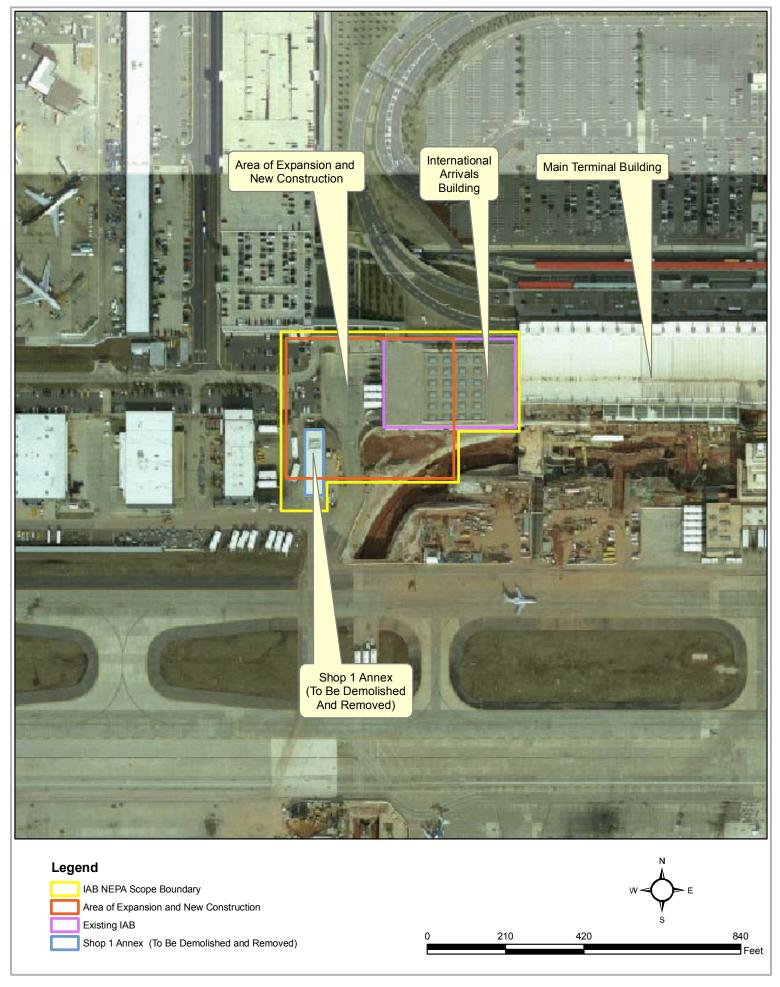
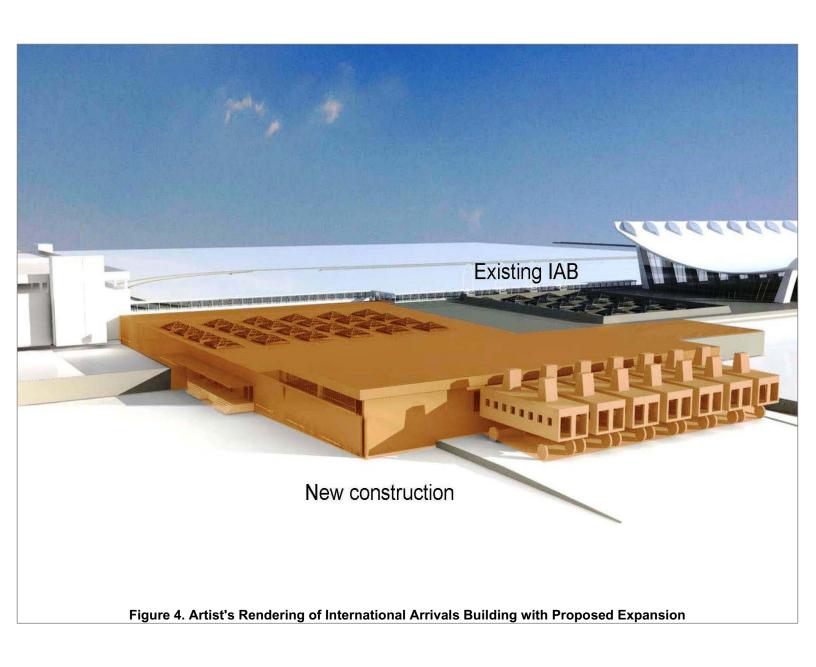


Figure 3. International Arrivals Building (IAB) Site Plan and Associated Projects



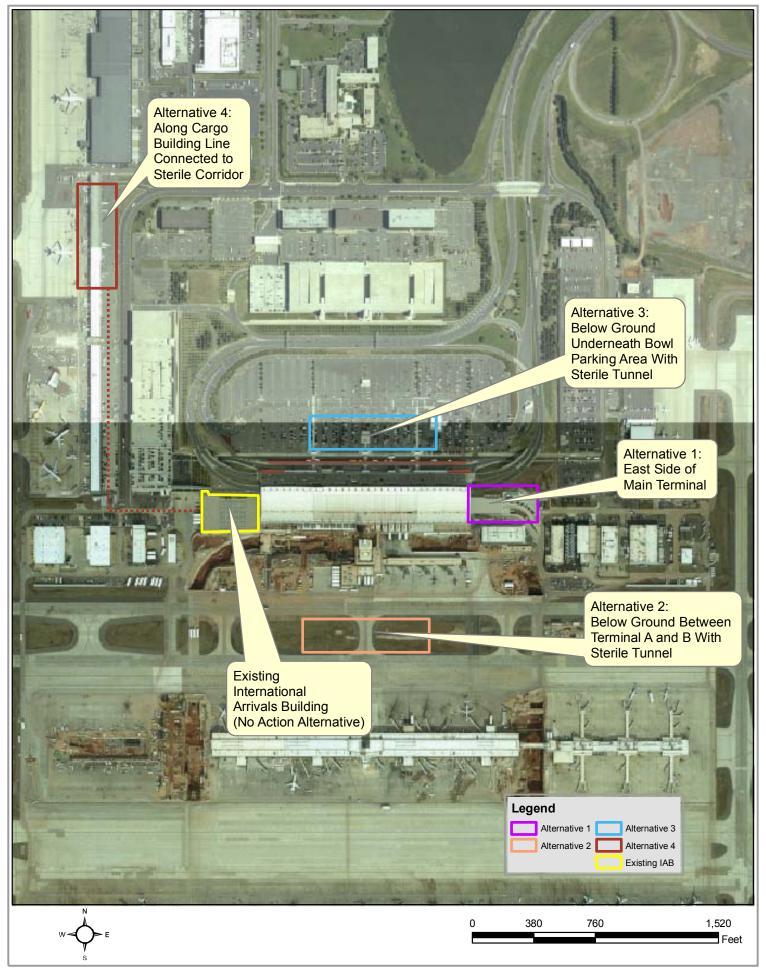


Figure 5. Alternatives to International Arrivals Building (IAB)

ATTACHMENTS

- A. Excerpt from Minutes of February 14, 2006 Meeting Between the Metropolitan Washington Airports Authority and the Virginia Department of Historic Resources
- B. Technical Memorandum, Shop 1 Annex Building, by Mike McCarty [Parsons Management Consultants], April 17, 2006
- C. E-Mail from Henry Ward to Marc Holma Concerning Additional Modifications to West Service Buildings, February 28, 2007
- D. Proposed Memorandum of Agreement between the Virginia State Historic Preservation Office and the Metropolitan Washington Airports Authority

ATTACHMENT A

Excerpt from Minutes of February 14, 2006 Meeting Between the Metropolitan Washington Airports Authority and the Virginia Department of Historic Resources

"International Arrivals Building Expansion

Dick Whiteley, [Architect/Project Manager], provided an overview of the proposed expansion/rehabilitation of the International Arrives Building, including Project Requirements and Construction Phasing. During the discussion it was explained that there was a compelling need to expand the existing facility, and that site limitations required that this expansion occur to the west, resulting in potential impacts to the original West Service Buildings.

Henry Ward [Authority Archeological and Historic Preservation Coordinator] went on to explain that the proposed project would require the demolition of the existing Shops 1 Annex, which represented the airports original Aircraft Rescue and Fire Fighting Facility. As one of the original Saarinen designed service buildings, this facility had been identified as a contributing element of the National Register eligible Dulles Airport Historic District. Mr. Holma [Virginia State Historic Preservation Officer representative] agreed that the removal of the building and the alteration to the architectural character of the West Service Building complex would represent an Adverse Effect, but that the visual impact to the Main Terminal forecourt and approach roadways would be limited by the location of the project behind the terminal approach ramps.

Mr. Holma proceeded to raise a number of suggested steps which would be considered to help mitigate the loss of the original structure including:

- 1) Potential relocation of the facility out of the impact area of the IAB expansion
- 2) Relocation of the facility to a new location on the airport
- 3) Potential salvage of the facilities character defining structural elements (exterior metal panels) to be available for future use as replacement panels on other original structures.

Although it was agreed that these steps would still result in the loss of original historic context, these steps would help to reduce the magnitude of the adverse effect. The discussion then turned to other potential mitigation measures, and Mr. Holma suggested that historic architectural documentation (either Historic American Engineering Record or VDHR Intensive Survey Form) would be more effective if it included a broader focus on the West Service Building and their relationship with the Main Terminal, rather then being limited to the Shops 1 Annex. The Authority staff thanked Mr. Holma for his suggestions and agreed that they would explore and provide a discussion of these options in the eventual formal submission."

ATTACHMENT B

Technical Memorandum, Shop 1 Annex Building, by Mike McCarty [Parsons Management Consultants], April 17, 2006

"International Arrivals Building: Shop 1 Annex Memorandum

The westerly expansion of the International Arrivals Building (IAB) at the Dulles International Airport (IAD) requires that the Maintenance Shop One Annex (Building 2409) be removed and its existing tenants relocated. Among the options considered by the Metropolitan Washington Airports Authority for the Shop 1 Annex was its dismantling and relocation to another site in order to preserve its historical value. Close inspection of the facility revealed that this was not a viable option for the following reasons.

- Corrosion and metal fatigue have significantly deteriorated the metal exterior panels making many unsalvageable.
- The exterior metal panels are fastened in a way that will require them to be cut away from the structure through the use of a blowtorch. In doing so the shape and size of the panels will become irregular and not readily reusable.
- The building's exterior, as well as much of the interior areas, has been exposed to lead paint requiring that all building parts be carefully sand blasted and cleaned. The age and condition of the exterior panels do not lend themselves to surviving this process in whole or part.
- There are other parts of the building that will have to be disposed of in whole or in part due to environmental concerns. Examples include the exterior building lights which contain PCB materials and the exterior window frames which have been exposed to lead paint and glazing with asbestos base materials.
- The building architectural structure and design is not consistent with [materials used on] any building currently under design or planned for the foreseeable future. It is not prudent or feasible to salvage Building 2409 materials so that they may be "blended" into another building for historical preservation purposes.
- Over the years the building has undergone numerous modifications including the addition of oversized exterior maintenance doors and interior fit-outs. It would be difficult to recreate an exact duplicate of the original building with materials in place today."

ATTACHMENT C

E-Mail from Henry Ward to Marc Holma Concerning Additional Modifications to West Service Buildings, February 28, 2007

From: Ward, Henry

Sent: Wednesday, February 28, 2007 6:45 PM

To: 'Holma, Marc'

Cc: Kleinman, Robert; Whiteley, Dick; Cortijo, Carlos; McCarty, Michael; Carvajal, Miguel;

Baummer Jr., Charley; 'straum@johnmilnerassociates.com'; PMC Mail Design

Engineering

Subject: Additional Information on Modifications to West Service Buildings (HS500 PRJ.2)

Attachments: Shop 1 Modifications.pdf

Marc:

After our delayed identification of the need to modify the doors on the AMF, we carefully went through the entire suite of projects related to the expansion of the International Arrival Building, to see if there were any other potential impacts.

During this process, we identified another issue which could result in minor modifications to one of the another of the original West Service Buildings.

During the construction of the IAB construction, the security fencing around the construction site will result in the blockage of the vehicle maintenance bay doors on the east side of the Shop 1 Building (where the airfield shuttle fleets on Mobile Lounges and Plane-Mates are serviced).

This situation will continue through the duration of the construction project, so the access will be blocked through 2010.

The Shop 1 Building is another one of the original service building and is located between the Shop 1 Annex and the Air Mail Facility.

Like the other buildings, it is a contributing element of the airport historic district.

In order to allow both the Mobile Lounges and Plane-Mates (which have a higher vehicle clearance) to enter all the east bay doors - it would be necessary to increase the height (but not the width) of a number of existing doors.

All of the west doors have already been replaced, but three of these doors openings have fixed metal transoms (with a window insert and obsolete floodlight fixture) that where left in place - when the original doors where replaced.

Although there is some evidence that these existing transoms may also have been modified - or even replaced - it is probable that they do represent original 1961 fabric.

As a result, we assume that the removal of these transom panels to allow the installation of the new higher door, would constitute an adverse effect.

It is our recommendation that we include this additional impact into the IAB MOA (as it is directly related to that project), and provide the same mitigation treatment that we have agree to for the other west service buildings (Intensive Survey Field Form).

As with the AMF modifications, the goal of this project is to allow the West Service Buildings to continue to serve important airfield service function.

And, as with the AMF, the modification will result in the removal of relatively minor portions of the original structure, but will leave the original architectural character of the structure and the surrounding historic district essentially unchanged.

I have attached a document with a more detailed description and illustration of the proposed Shop 1 modification.

After your review, we are hoping that you will agree that the inclusion of this undertaking in the IAB MOA and mitigation plan is appropriate.

Once I have received you concurrence with this approach, we will modify the IAB consultation documentation and submit them for your formal review.

In the meantime, we are moving forward with the recordation process and anticipate that the Intensive Survey Field Form (for all four of the West Service Buildings) should be complete and ready for submission in March.

Related to the architectural survey, I would like to clarify the photographic requirements.

I checked the Survey Guideline document on the VDHR website, and it provided a good deal of information on both B/W print/negatives and color slides, but did not make any mention of digital photography.

I noted that the guidelines were updated in 2003 - but want to make sure that had not been an additional guidance developed for the use of digital photography.

Please feel fee to contact me if you have any questions - and I hope to here back from you soon on your response to our approach on the Shop 1 door modifications.

I am sorry that we seem to be coming up with "just one more issue" - but I am confident that we have been through each aspect of the project and that there are no more surprises.

As always, I can be reached by cell (410-925-6730) or PDA (wardhe@pbworld.com).

Thanks for you continued assistance and cooperation.

Henry Ward

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Proposed Modification of Shop 1 Building Washington Dulles International Airport

Project Background

- 1) The existing Shop 1 Building, used to service the Mobile Lounge and Plane-Mate airfield shuttle fleets, is located to the west of the Main Terminal at Washington Dulles International Airport (Figure 1 & Figure 2).
- 2) This structure, along with the other West Service Buildings (Figure 3), has been determined to be contributing elements to the Dulles Airport Historic District (which has been determined to be eligible for the National Register of Historic Places).

Purpose and Need

- During the construction related to the proposed expansion of the International Arrival Building, the doors on the east side of the existing Shop 1 Building will not be able to be used for a considerable period of time (approximately until 2010).
- 2) As a result, all vehicle access to the maintenance bays in Shops 1 will need to occur through the overhead doors on the west side of the building (Figure 3).
- 3) In order to allow all of the doors and all of the maintenance bays to be able to be used for both the historic Mobile Lounges as well as the later and taller Plane-Mate vehicles (Figure 4), all of the west doors would need to have a clearance height of (24' 6").
- 4) As a number of the west doors do not currently have this clearance, the Authority is proposing modifications to the structure to allow doors of sufficient height to be installed in all of the west door openings.
- 5) One of the original door openings on the west side of the building has already been modified (Door 1 on Figure 8), and one non-original door with a similar transom to the original doors has also been modified (Door 5 on Figure 8)

Existing Conditions

- 1) None of the doors on the west side of the building represent original overhead doors, all of the original 1961 doors have already been replaced
- 2) The original doors were of wooden construction and had a central vertical band of window inserts (Figure 5 As Built Plans dated April 14 1961).

- 3) The current doors represent two different variety's fiberglass replacement doors, one with a horizontal band of windows (dark colored door in Figure 6, and one with no windows (light colored door in Figure 6).
- 4) However three of the existing doors (Doors 2,3 and 4) appear to have fixed transom panels above the doors that are similar to the panels that are shown in the originally 1961 design for the structure
- 5) The existing door transoms exhibit a number of discrepancies from the original design, which suggested that they might represent later additions or modifications of the original transoms:
 - a. The design calls for a solid fixed metal panel with clearly incised horizontal scribe lines to replicate the pattern of the segmented overhead doors;
 - b. The existing doors, are clearly constructed from a series of welded plates and do not exhibit any horizontal scribe lines (Figure 7a);
 - c. The transom over Door 5 (Figure 7b), which is not one of the original doors show in the 1961 plans, appears identical with the transoms for the original openings for Doors 2, 3 and 4, (the transom over the opening of the original Door 1 was removed when this door was replaced in 1972).
- 6) However, these three transoms do exhibit a number of basic features shown on the original transom plans:
 - a. The central spotlight fixture (now non-operational);
 - b. Two horizontal window inserts (most replaced by metal inserts)
- 7) Although careful examination of the existing doors, design documentation and historic photography has been unable to determine if the existing transom panels are original, it seems more likely that they do represent original building features.
- 8) As the modification necessary to increase the west door openings would require the removal of the transom panels, the modification would constitute an adverse effect on a contributing element of the historic district.

Conclusions

 The proposed minor modifications to the western door openings is necessary to allow the Shops 1 Building to continue to perform its original function of servicing the airfield shuttle fleets, during the significant period Modification of Shop 1 Doors Washington Dulles International Airport Page 3 of 3

when adjacent construction will block the access to the east side of the building,

- 2) The visual appearance of the modified Shop 1 building would be very similar to the original building plans, were the horizontally scribed transom panels were intended to give the impression of segmented doors extending from the apron pavement to the building parapet (Figure 8).
- 3) The replacement of the existing non-original doors will allow, for all the doors to have a consistent and balanced appearance.
- 4) As the plans for the IAB Expansion already includes the historic recordation of the all four original west Service Buildings, this element of an appropriate mitigation treatment has already been developed.
- 5) As the modification of Shop 1 is directly linked to the expansion of the IAB, it would appear to be reasonable to include the potential effects and mitigation treatment as an element of the Memorandum of Agreement developed for the IAB Expansion.

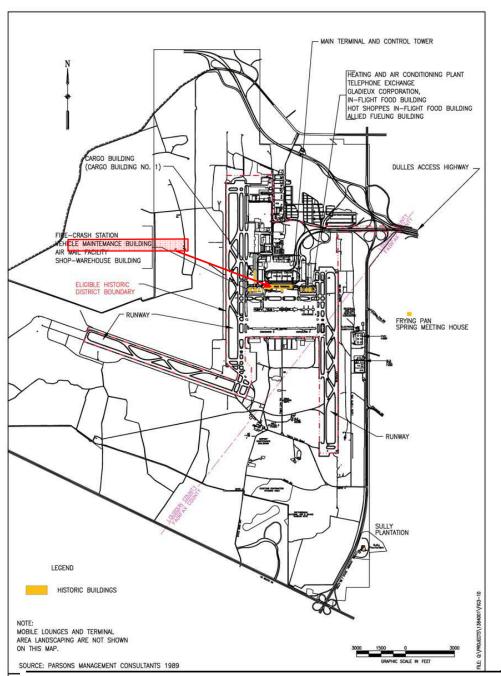


Figure 1: Project Location – IAD Shop 1 Building (Historic District and Properties Shown)

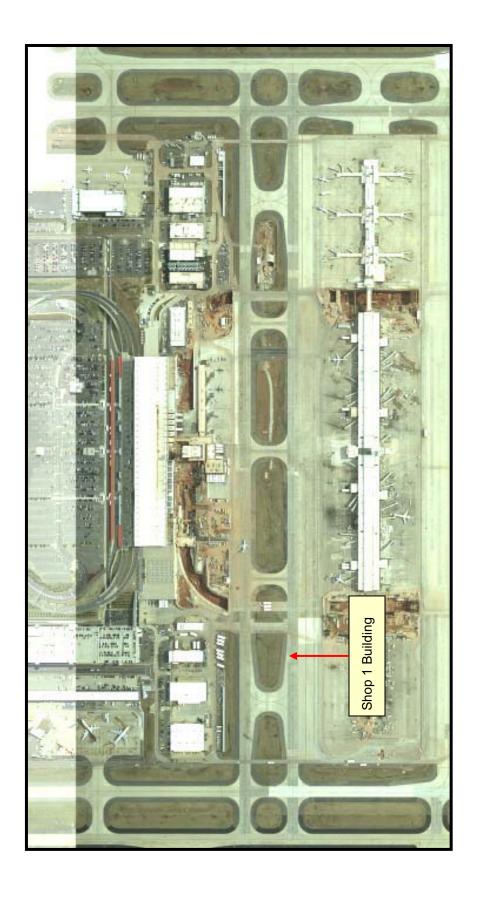


Figure 2: Shop 1 Facility (Showing Location Relative to Main Terminal and West Flank Service Structures)

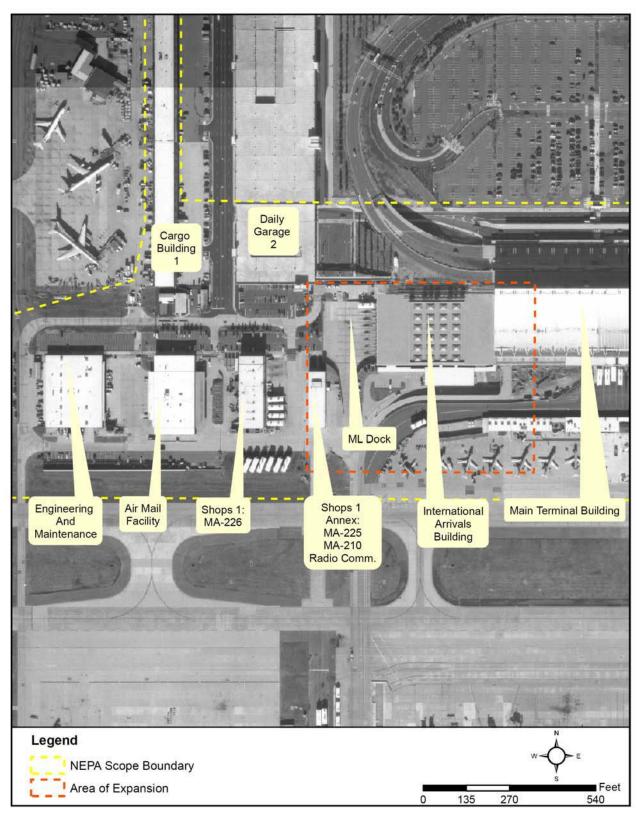


Figure 3: West Service Buildings



Figure 4: Mobile Lounge and Plane-Mates

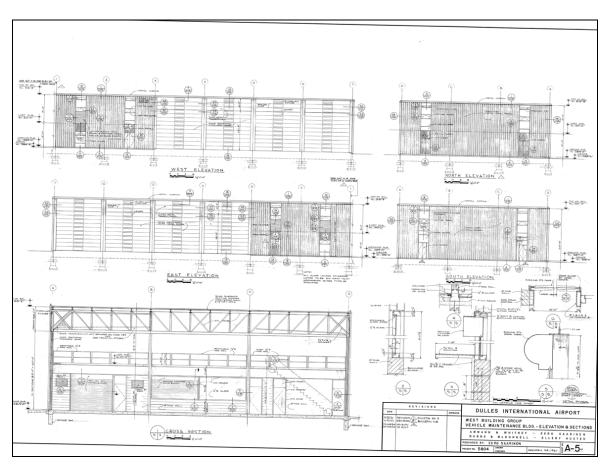


Figure 5: Shop 1 Building (1961 - As Built Plans)



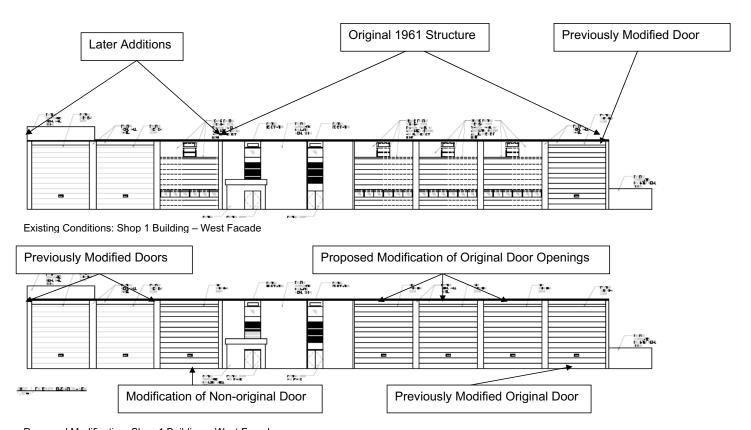
Figure 6: Shop 1 Building (Showing both sets of replacement doors)



Figure 7a: Shop 1 Building (Showing details of original Door 4 transom)



Figure 7b: Shop 1 Building (Showing details of non-original Door 5 transom)



Proposed Modification: Shop 1 Building – West Facade

Figure 8: Proposed Modifications to Shop 1 Doors - West Facade

ATTACHMENT D

Proposed Memorandum of Agreement between the Virginia State Historic Preservation Office and the Metropolitan Washington Airports Authority



March 20, 2007

Mr. Marc Holma State Historic Preservation Office Virginia Department of Historic Resources 2801 Kensington Avenue Richmond, VA 23221

RE: International Arrivals Building Expansion Washington Dulles International Airport Fairfax and Loudoun Counties

Dear Mr. Holma:

The Metropolitan Washington Airports Authority (the Authority) is proposing an expansion of the International Arrivals Building (IAB) at Washington Dulles International Airport (IAD). The current IAB is located within the boundaries of the National Register eligible Dulles Airport Historic District (NRHP), (Figure 1), directly to the west of the Main Terminal (Figure 2).

The IAB was designed in the late 1980's, complying with the Immigration and Naturalization Services and U.S. Customs Service requirements at the time, and was planned to process 2,000 passengers per hour. These regulations changed through the years and more extensive security investigative procedures have been implemented. These changes have subsequently reduced passenger throughput, which has resulted in a corresponding redirection of facility capacity to accommodate passengers.

In response, the Authority has performed a technical analysis of the space requirements necessary to address present and future passenger volumes and has developed an expansion plan to allow the current facility to be upgraded and expanded to meet these requirements. The IAB is located between the Main Terminal and the Shop 1 Annex (Figure 2), which have been formally identified as contributing elements of the Dulles Airport Historic District (Figure 2). Due to the location within the Dulles Airport Historic District and the proximity of the contributing historic properties, the Authority has undertaken historic preservation planning studies and has initiated consultation with your office, pursuant to our 1987 Programmatic Memorandum of Agreement regarding Section 106 of the National Historic Preservation Act (36 CRF Part 800) and Section 4(f) of the Department of Transportation Act (23 U.S.C. 138).

1.0 CONSULTATION BACKGROUND

This submission is intended to provide updated design documentation, which has been developed following a presentation and discussion of this project during an on-site design review meeting held in our offices on February 14, 2006. During this meeting the potential effects of this proposed expansion on the contributing elements of the National Register eligible Dulles Airport Historic District were discussed, including the demolition of the Shop 1 Annex (an original airport service building). As the IAB Expansion would require the removal of this original service structure, the project was determined to constitute an adverse effect on contributing elements of the NRHP eligible historic district. At the time of the meeting, there was general concurrence that the demolition of this building would represent an adverse effect, and suggestions where made as to additional analysis to see if this effect could be avoided, minimized or mitigated. This letter includes additional information related to these comments, and is provided to continue the consultation process related to this project.

Based on the completed engineering and operational alternative treatment analysis, the Authority staff was unable to identify a feasible means to avoid or minimize the adverse effect on this contributing historic property. As a result, this letter addresses a variety of mitigation measures recommended during the project review meeting. In order to address this adverse effect, the Authority has drafted the attached Memorandum of Agreement (MOA), for your review and signature. It should be noted that this is a two-party MOA between the Authority and Virginia Department of Historic Resources/Virginia State Historic Preservation Officer (VDHR/VASHPO). The Federal Aviation Administration has been invited to be a concurring party. Although the Advisory Council on Historic Preservation was a signatory of the Authority's original 1987 Programmatic Memorandum of Agreement (PMOA), they have been contacted regarding this project and have not indicated their intent to participate in the current consultation.

During subsequent project analysis discussions between February and March 2007, the Authority identified additional impacts to the adjacent Shop 1 Building, and consulted with the staff of the VDHR on the character of these impacts. As the IAB expansion project would block the vehicle maintenance bay doors on the east of the Shop 1 building, continued maintenance for the airfield shuttle fleet would require the modification of the existing door openings on the west side of the Shop 1 building. Examination of existing building plans demonstrated that all the original west doors had been replaced and a number of original door openings had been modified. However, the proposed door replacement would result in modifications to four original door transom panels, and would therefore constitute an adverse effect on the original fabric of the Shop 1 Building. After coordinating with the VDHR staff, the Shop 1 impacts were added to the current consultation documentation and Memorandum of Agreement (MOA) for the IAB Expansion.

By this submission, the Authority is continuing agency consultation on the potential impact of this project on eligible contributing elements of the Dulles Airport Historic District. These design review and agency consultation procedures are consistent with the stipulations of the 1987 Programmatic Memorandum of Agreement regarding Section 106 of the National Historic Preservation Act (36 CRF Part 800) and Section 4(f) of the Department of Transportation Act (23 U.S.C. 138).

2.0 PROJECT BACKGROUND

The existing IAB immigration lobby is unable to support the queuing of the current passenger loads. The passport control process takes longer than originally envisioned, and the bags reach the carousels long before the travelers do. The bag claim devices are overloaded most of the time during peak times. This situation requires the bags to be removed manually and stockpiled on the floor, unavoidably in the passenger queuing areas. This condition reduces the available passenger flows as it diminishes the level of service in the facility.

This project includes the expansion and/or refurbishment of the IAB passenger and basement levels (Figure 3). It will provide additional square footage to the queuing area in the immigration lobby, will increase the number of passport control booths to comply with current Customs and Border Patrol processing requirements and regulations, and will construct new bag claim devices with a presentation length to assure the optimum baggage holding capacity. The project will expand and/or refurbish 211,490 square feet of existing facilities at the passenger level and 383,000 square feet at the basement level. It excludes the Sterile Tunnel from Concourse B to the IAB, and modifications to Concourse B (both facilities representing non-contributing elements of the airport historic district). Additionally, this project enhances the baggage make-up area by providing additional baggage make-up devices, improved bag tug flows, and better access to baggage handling area.

3.0 POTENTIAL EFFECTS TO ARCHEOLOGICAL RESOURCES

This IAB Expansion should have no potential to impact any significant archeological resources in the airfield apron areas, which have already undergone extensive and intensive prior disturbance during the original airport development. As a result, the potential for intact archeological resources in this area is negligible and no additional archeological investigations are recommended. However, stipulations outlining procedures to address unanticipated discovery of archeological resources and human burials have been included in the attached MOA.

4.0 PROJECT IMPACT TO SHOP 1 ANNEX

There are significant physical limitations to the potential expansion of the existing IAB. As the building is located directly to the west of the Main Terminal, expansion to the east is not possible. The existing building is located directly to the south of the

existing terminal enplaning and deplaning ramps, barring expansion to the north. Expanding the IAB directly to the south would not provide the necessary structural capacity to accommodate the required expansion, without impinging on the critical Mobile Lounge circulation paths to the Main Terminal docks.

A significant vertical expansion of the structure above the existing roofline would result in the building extending above the current Main Terminal plinth and ramps, resulting in an undesirably obtrusive structure directly adjacent to the historic Main Terminal. As noted above, the proposed expansion already includes the expansion of the basement level. Further sub-grade levels for the structure are not considered operationally feasible.

As a result of these limitations, expansion of the existing structure to the west was seen as the only reasonable means to achieve the space requirements to address critical operation standards. Unfortunately, expansion in this direction would result in an unavoidable impact on an adjacent historic property, the demolition of the existing Shop 1 Annex (Figure 3). Originally constructed to serve as the Aircraft Rescue and Fire Fighting (ARFF) facility, the Saarinen-designed service building (Figure 4) has been identified as a contributing element of the National Register eligible Dulles Airport Historic District.

5.0 ALTERNATIVES ANALYSIS

The project planning and development process of the IAB Expansion included a careful alternatives analysis to address the need for expanded and updated Immigration and Naturalization Services and U.S. Customs Service facilities while avoiding or minimizing potential impact to the airport's historic properties.

5.1 ALTERNATIVES ANALYSIS TO AVOID ADVERSE EFFECT

In mid-2004, the Authority embarked on a study to analyze future concourse and international passenger arrivals facilities. Through an on-call planning contract, the Authority focused an analysis on consideration of various options and locations for processing the increasing number of international arriving passengers at IAD as well as those projected to use IAD in the future. Two elements were major considerations for the focused study and the final recommendation for the international arrivals facility:

1. The original intent from the 1960 Master Plan was to locate the international arrivals facility on the west side of the terminal. While many options for an IAB facility not on the west side of the terminal were considered as part of the study, the need to respect and remain consistent to the original Saarinen concept was a key factor in the decision process.

2. Many changes have occurred since the IAB opening in 1991 which have had a dramatic impact on the facility's ability to adequately serve international passengers arriving to the Nation's Capital port of entry. Changes in aircraft fleet mix, load factors and more recently changes in protocols/processing for passengers have all negatively impacted the facility. A recent analysis indicated that the current IAB facility has a peak hour processing capacity of between 900 and 1,200 passengers. During the 2005 and 2006 peak months (July and August) it was calculated that the facility was processing between 1,500 and 1,700 peak hour passengers during the busiest peak periods. Typical planning for facilities aims for accommodating average day, peak month, peak hour passengers. As a result, the other major consideration for the alternatives analysis was to develop an option to regain the capacity and provide for possible future expansion opportunities.

In general, four basic options for an expanded IAB facility were considered:

- 1. Near the existing IAB facility expansion of the existing of the existing facility was deemed to be most cost effective and most viable from a constructability perspective. The Authority has invested a significant amount of resources in developing the existing facility and to move to another site would require a similar investment inflated to today's dollars to recreate the new facility.
- 2. On the east side of the Terminal recreating the IAB on the east side of the Terminal in an expanded form. As stated above, recreating the existing IAB facility on the east side of the Terminal would require a significant investment to develop an exact duplicate of the existing facility. To meet the current and near term demands, the new facility would need to include an additional 150,000 plus square feet. Dependent on a more refined conceptual layout of an east-side facility, other facilities/functions currently located on the east side of the Terminal may be impacted such as the MU2 baggage make-up building and the utility building providing heating and cooling for the Terminal and surrounding buildings. The alternative also had the potential to adversely impact the East Service Buildings, which also represent contributing elements to the Dulles Airport Historic District.
- 3. Between Concourse A/B and the Terminal conceptually located below ground with a non-secure exit tunnel leading to the landside. The options for this idea considered locating a new IAB facility below ground between midfield Concourse A/B on the east or west side. Passengers would access the facility via sterile corridors from Concourse B and would exit via a non-secure tunnel leading toward the landside for access to the curb, parking and other ground transportation. This alternative would replace the existing IAB. Although this alternative would avoid direct impact to historic properties, construction of this below ground facility and its connection tunnels in the midfield area was

considered to be too expensive and disruptive to airfield and concourse operations to be considered prudent and feasible.

4. North of the Terminal in the bowl parking area – below ground facility with a sterile/secure tunnel allowing passengers to move from the airside to the facility on the landside. This alternative would develop a replacement IAB facility in the bowl parking area below ground. Passengers would be delivered to the facility via a sterile/secure corridor and would exit the facility directly to landside elements such as parking, curbside, or the ground transportation center. Delivering baggage to the new facility was more problematic than other alternatives. Once again, such a substantial below ground facility was considered to be too expensive and disruptive to landside operations to be considered prudent and feasible.

The Alternatives Analysis was completed using the following criteria:

- 1. Shortest Implementation Time frame Constructability
- 2. Lowest Relative Cost
- 3. Passenger Convenience Terminating and Connecting
- 4. Airline Efficiency
- 5. Customs and Border Protection (CBP) Efficiency
- 6. Terminal and Landside Impact
- 7. Gate Flexibility
- 8. Compatibility with the Saarinen Master Plan
- 9. Potential Impacts to Historic Properties

The evaluation was conducted in a matrix that weighted the criteria. The alternatives were judged and ranked, with the alternative to expand the existing IAB deemed as the most economically viable with the best ranking for constructability. Although this alternative would result in an adverse effect to the Shop 1 Annex, all of the other alternatives would result in significantly greater costs and disruptions to airport operations, and also could result in adverse effects on other contributing elements of the airport historic district.

5.2 ALTERNATIVES ANALYSIS TO MINIMIZE ADVERSE EFFECT

During the February 14, 2006 meeting, a number of suggested steps were discussed to help avoid or minimize the adverse effect of the demolition of the Shop 1 Annex, including:

- Potential relocation of the facility out of the impact area of the IAB expansion;
- Relocation of the facility to a new location of the airport
- Potential salvage of the facility's character-defining structural elements (exterior metal panels) to be available for future use as replacement panels on other original structures.

Although it was agreed that these steps would still result in the loss of original historic context, they had the potential to reduce the magnitude of the identified adverse effect. The Authority agreed to explore and provide a discussion of these options in this formal submission. An engineering and operation analysis of these possible alternatives was conducted, and the results are presented below.

The westerly expansion of the IAB at the Dulles International Airport (IAD) requires that the Shop 1 Annex (Building 2409) be removed and its existing tenants relocated. Among the options considered by the Authority for the Shop 1 Annex was its dismantling and relocation to another site in order to preserve the structure. Close inspection of the facility revealed that this was not a viable option for the following reasons.

- Corrosion and metal fatigue have significantly deteriorated the metal exterior panels making many unsalvageable.
- The exterior metal panels are fastened in a way that will require them to be cut away from the structure through the use of a blowtorch. In doing so the shape and size of the panels will become irregular and not readily reusable.
- The building's exterior, as well as much of the interior contains lead paint requiring that all building parts be carefully sand blasted and cleaned. The age and condition of the exterior panels do not lend themselves to surviving this process in whole or part.
- There are other parts of the building that will have to be disposed of in whole or in part due to environmental concerns. Examples include the exterior building lights that contain PCB materials and the exterior window frames that have been exposed to lead paint and glazing with asbestos containing materials.
- The building architectural structure and design is not consistent with materials to be used on any building currently under design or planned for the foreseeable future. It is not considered prudent or feasible to salvage Shop 1 Annex materials so that they might be "blended" into another building.

As a result of this analysis, it was concluded that alternative treatment to avoid or minimize the adverse effect of the demolition of the original structure is not feasible. The Authority has concluded that this demolition represents an unavoidable adverse effect on a contributing element of the National Register eligible Dulles Airport Historic District. A discussion of the potential mitigation measures for this aspect of the project is included in Section 7 below, following a consideration of the other potential impacts of the IAB Expansion on other contributing elements and the architectural character of the historic district.

6.0 ADDITIONAL POTENTIAL IMPACTS

During the meeting of February 14, 2006, there was concurrence that the removal

of the Shop 1 Annex would constitute an adverse effect. Additional project analysis has identified other potential impacts to contributing elements of the Dulles Airport Historic District; and these potential impacts are discussed below.

6.1 MODIFICATIONS TO SHOP 1 BUILDING

The existing Shop 1 Building (original Vehicle Maintenance Building) located to the west of the Shops 1 Annex, was originally designed for, and continues to house, the maintenance service bays for the airports airfield shuttle fleets (Figure 2 and 3). This structure, along with the other West Service Buildings (Figure 2, has been determined to be contributing elements to the Dulles Airport Historic District.

During the construction related to the proposed expansion of the IAB, the doors on the east side of the existing Shop 1 Building cannot be used for a considerable period of time (through 2010). As a result, all vehicle access to the maintenance bays in Shop 1 will need to occur through the overhead doors on the west side of the building. In order to allow all of the doors and all of the maintenance bays to be able to be used for both the historic Mobile Lounges as well as the later and taller Plane-Mate vehicles (Figure 5), all of the west doors would need to have a clearance height of (24' 6").

As a number of the west doors do not currently have this clearance, the Authority is proposing modifications to the structure to allow doors of sufficient height to be installed in all of the west door openings. A careful review of the original plans and specifications of the Shop 1, have verified the following points:

- The original Shop 1 plans (As Built Plans dated April 24, 1961) show the initial configuration of the building with four overhead shops bay doors on the south end of the building, and two bays of metal panel wall with doors and windows to the north (Figure 6).
- Existing plans also show that two doors were added to the building soon after this, as addendum plans (dated December 1961) show the addition of two doors identical to the first four (Figure 7).
- None of the doors on the west side of the building represent original overhead doors, as all of the original 1961 doors have already been replaced. The original doors were of wooden construction and had a central vertical band of window inserts (Figure 6 and 7).
- The current doors represent two different models of fiberglass replacement doors, one with a horizontal band of windows (dark colored doors in Figure 8), and one with no windows (light colored door in Figure 8).
- Four of the existing 1961 doors (Doors 2, 3, 4 and 5) fixed transom panels above the doors that are similar to the panels that are shown in the original 1961 design for the structure (Figure 9).
- Careful examination of the existing doors, design documentation and historic photography has been unable to verify with 100 percent certainty that all the

existing transom panels represent unaltered elements of the building; however, at this point it seems likely that they represent original building features.

As the modification necessary to increase the west door openings would require the removal of the transom panels, the modification would constitute an adverse effect on the original fabric of a contributing element of the historic district. The proposed minor modifications to the western door openings is necessary to allow the Shop 1 Building to continue to perform its original function of servicing the airfield shuttle fleets, during the significant period of time when adjacent construction will block the access to the east side of the building.

Although the proposed modification would require modification of the original door transom panels, the visual appearance of the modified Shop 1 building would be very similar to the original building plans, where the horizontally scribed transom panels were intended to give the impression of segmented doors extending from the apron pavement to the building parapet (Figure 6). In addition, the replacement of the existing non-original doors with new doors matching those that have already been installed in the building, the final condition of the structure will have a consistent and balanced appearance, compared to the current miss-matched sets of two very different doors and door openings (Figure 9).

As the plan for the IAB Expansion already includes the historic recordation of the all four original west Service Buildings, this element of an appropriate mitigation treatment has already been negotiated. As the modification of Shop 1 is directly linked to the expansion of the IAB, it would appear to be reasonable to include the potential effects and mitigation treatment of this facility in the MOA developed for the IAB Expansion. The recommendation that the Shop 1 door modification be included in the IAB Expansion consultation was discussed with the staff of VDHR during e-mail exchanges during early March 2007, and concurrence on this approach was reached.

6.2 POTENTIAL VISUAL IMPACTS TO HISTORIC DISTRICT

As the existing IAB roofline lies below the level of the terminal approach ramps, the existing facility is essentially not visible as one approaches the terminal on the airport access roadway. Figures 10 and 11 represent a series of visual simulations of the expanded IAB as seen from a series of viewpoints along the access path to the Main Terminal (Viewshed 1 from Saarinen Circle, Viewshed 2 from the terminal approach ramp and Viewshed 3 from the upper roadway). In each case, the locations of the IAB below the level of the terminal ramps and surrounded by a raised parapet effectively block the view of even the expanded structure.

The potential impact of the expanded building on the overall character of the historic district also was taken into account. As the Shop 1 Annex represents one of four original West Service Buildings, its removal would have the effect of reducing massing and interrupting the structural rhythm of the line of secondary structures. Although the

removal of this structure will have an effect, the Shop 1 Annex represented by far the smallest of the original structures, with the deepest setback from the service road (Figure 2). As a result, the remaining three larger buildings fronting directly on the roadway, still effectively convey the architectural character of the West Service Buildings and their association with the Main Terminal (even if the Shop 1 Annex is removed).

6.3 ADDITIONAL ARCHITECTURAL IMPACTS

As previously noted, the existing IAB structure has been determined to be non-contributing element of the Dulles Airport Historic District, so the demolition of the existing exterior structure will not constitute an adverse effect. The potential impact of the IAB expansion on the architectural character of the Main Terminal and the surrounding historic district will be minimized by designing the exterior south and west facade of the expansion to be compatible with the existing architectural treatment of the existing IAB. The majority of the exterior walls are to be constructed of concrete panels of a similar texture and color as the existing IAB and Main Terminal plinth. Figure 12A and 12B present comparable views of the existing IAB and a computer generated exterior perspective of the expanded structure. A comparison of these views helps to highlight the similar architectural character of the exiting and proposed IAB structures. The major differentiating element is the relocation of the Mobile Lounges dock from the west façade of the existing structure to the south façade of the proposed expansion.

The expansion of the IAB will require the relocation and reconfiguration of the facility's interior space and functions. As a result, it may be necessary or desirable to alter the exterior treatment to complement the new interior configuration. Such alterations to exterior design will carefully consider the historic architectural character of the facility's setting, and the design will be provided the VDHR for review and comment as design development continues. It is anticipated that additional design development will be completed, and the next stages of VDHR review can occur, during the early part of spring of 2007.

6.4 IMPACTS FROM FACILTY RELOCATION

During the Design Review Meeting on February 14, 2006, there was discussion of the Authority's plan to relocate the airport functions currently contained in the Shop 1 Annex to the Air Mail Facility (AMF), another of the original West Service Buildings. The current United States Postal Service (USPS) facility in the AMF was to be relocated to another location. Since this discussion the USPS has made the unilateral decision to relocate their facility, vacating the AMF sooner than expected. As a result, the Authority entered into separate consultation with the staff of VDHR on proposed modifications to this structure necessary to allow for the relocation of a number of consolidated functions into the AMF. The Authority prepared a separate consultation document for this project, and received VDHR concurrence with the determination of No Adverse Effect.

7.0 PUBLIC PARTICIPATION

The Authority has proposed to dovetail the public participation process required by NEPA and Section 106 (as defined by the terms of the 1987 PMOA) and has received concurrence from the staff of the VDHR for this approach. It was agreed that the standard NEPA public process (public announcements, circulation of the draft document, public review opportunities) will fulfill the general public information requirements of both NEPA and Section 106. However, in order to address the more specific Section 106 requirements for the identification of potential Interested Parties, the Authority also will conduct a target public participation process. To this end, a list of potential Interested Parties has been developed based on groups and individuals providing formal comments on the historic preservation issues during the recent Runways and Related Facilities Environmental Impact Statement (2005).

The Authority proposes to contact the following agencies and individuals to invite them to participate in the consultation process for the IAB Expansion, pursuant to 36 CFR 800.2(d): Fairfax County Department of Planning and Zoning, Loudoun County Department of Planning, U.S. Army Corps of Engineers, Mr. Peter Roberts and Mr. Phil Lo Presti, Jr. As indicated in the attached MOA, the Authority will review the comments received from these agencies and individuals (as well as any others gathered during the combined NEPA/Section 106 public participation process) and will take them into account in the development of the final design for the project.

8.0 MITIGATION OF ADVERSE EFFECTS

During the February 14 meeting, potential mitigation measures were discussed in case it was found that avoidance or minimization measures could not be implemented. In addition to continued consultation the other aspect of the IAB Expansion, historic architectural documentation was suggested (in the form of a VDHR Intensive Survey Form). Rather being limited to a simple documentation of the Shop 1 Annex structure, this documentation would include a broader consideration of the West Service Buildings and their relationship with the Main Terminal and original airport Master Plan. The Authority assures that this documentation will be produced and submitted for VDHR review prior to any project actions that would alter the Shop 1 Annex or any of the West Service Buildings.

While the proposed expansion of the IAB will have adverse effects on contributing elements of the Dulles Airport Historic District, the Authority believes that the proposed plan also represents a number of positive elements which help to minimize and mitigate the overall effect of the project:

• An expansion of the IAB facility in a way that minimizes the visual impacts to the Main Terminal and surrounding historic district;

- Utilization of compatible new exterior and interior design which attempts to assure that the new IAB will continue to be an appropriate and compatible addition to the airport's built environment;
- The maintenance and continued use of the other West Service Buildings for airfield and airport support services;
- Avoiding the construction of new airport service facilities within the historic district and in the vicinity of the Main Terminal;
- The modification of the Shop 1 structure to allow the facility to continue to perform its originally intended use as a airfield shuttle maintenance facility;
- Limiting modifications of the Shop 1 facility to the minimum necessary for it to perform the vehicle maintenance functions, while maintaining its original architectural character.

9.0 MEMORANDUM OF AGREEMENT

The proposed IAB Expansion will result in an adverse effect on a contributing element of the Dulles Airport Historic District, including the demolition of the Shop 1 Annex and modifications to the Shop 1 Building. However, the Authority believes that it has demonstrated that the operational requirements of the airport require an expansion of the existing IAB, and that this expansion cannot be achieved while avoiding or minimizing other impacts on the Dulles Airport Historic District. The Authority has investigated potential alternative treatment options to minimize this adverse effect on the structure and has failed to find a feasible treatment. As a result, the Authority has drafted the attached MOA for your review and signature.

10.0 CONCLUSIONS

It is hoped that the MOA is considered adequate to demonstrate the Authority's efforts to comply with terms of the 1987 Programmatic Memorandum of Agreement (as regards Section 106 of the National Historic Preservation Act (36 CFR Part 800) and Section 4(f) of the Department of Transportation Act (23 U.S.C. 138).

Our President and CEO has signed the MOA on behalf of the Authority and we request that you have the document signed and returned to my office. The Authority will then obtain FAA concurrence and return the fully executed copies of the agreement to all signatory parties and the Advisory Council on Historic Preservation.

Upon full execution of the agreement, the Authority will proceed with the development of the design and historic structures documentation that will form the basis for continued consultation under the terms of the attached Memorandum of Agreement. The Authority appreciates your concurrence with this consultation process and looks forward to working with you to review the remaining stages of this important project.

Should you have any questions regarding this project or these consultation documents, please contact the Authority's historic preservation consultant, Henry Ward. He can be reached by phone on 410-925-6730 or by e-mail at henry.ward@mwaa.com.

Sincerely,

Frank D. Holly If.
Vice President for Engineering

Enclosures

cc: Katry Harris, Advisory Council on Historic Preservation (w/attachments)
Jennifer Mendelsohn, FAA Washington Airports District Office (w/attachments)

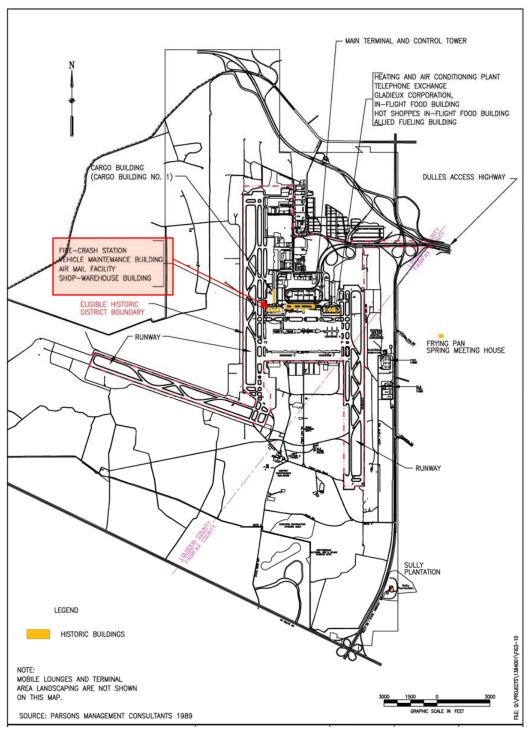


Figure 1: Project Location – IAB Expansion (Historic District and Adjacent Historic Properties Shown)

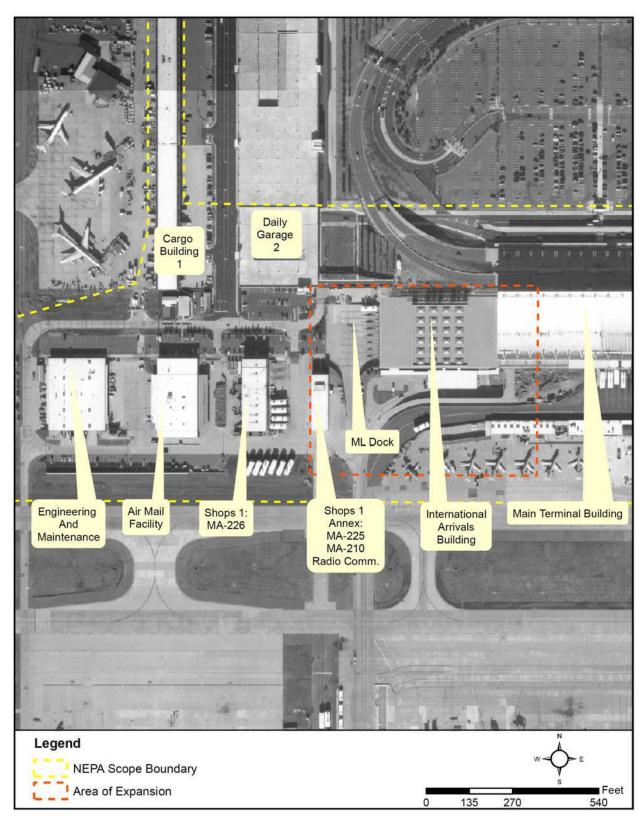


Figure 2: IAB Expansion - West Service Buildings and Main Terminal

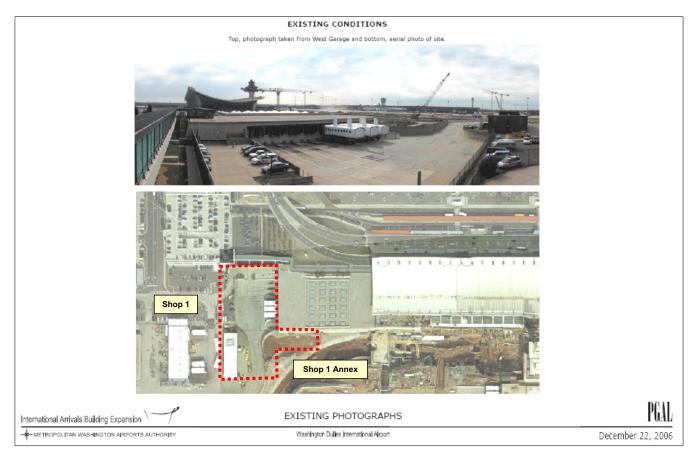


Figure 3: IAB Expansion - West Service Buildings and Main Terminal (Showing Area of IAB Expansion)



Figure 4: Existing Conditions – Shops 1 Annex



Figure 5: Mobile Lounge and Plane-Mates

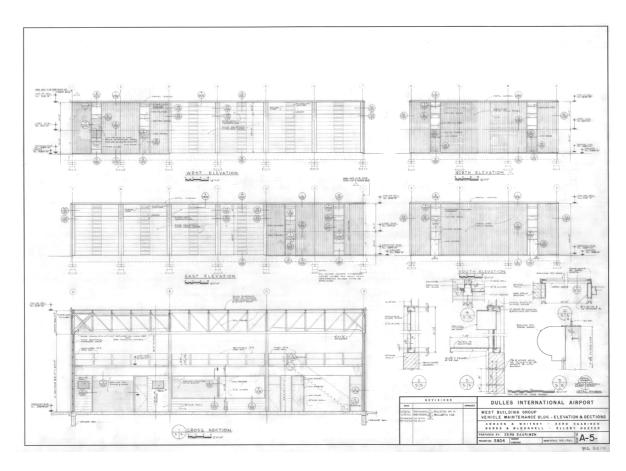


Figure 6: Shop 1 Building (April 14, 1961 - As Built Plans) Showing Existing Doors 1-4

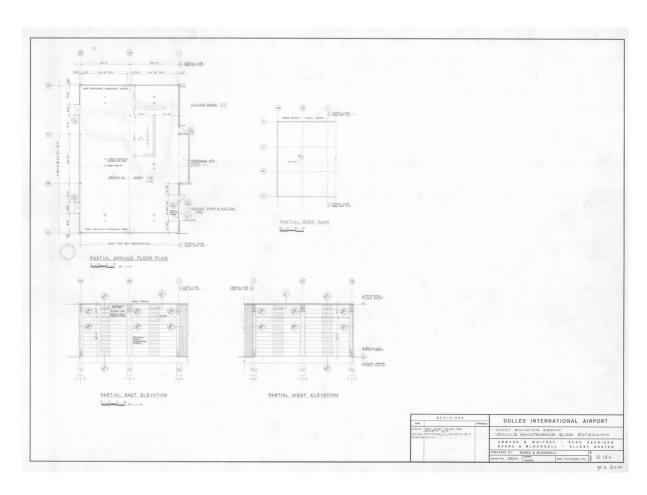
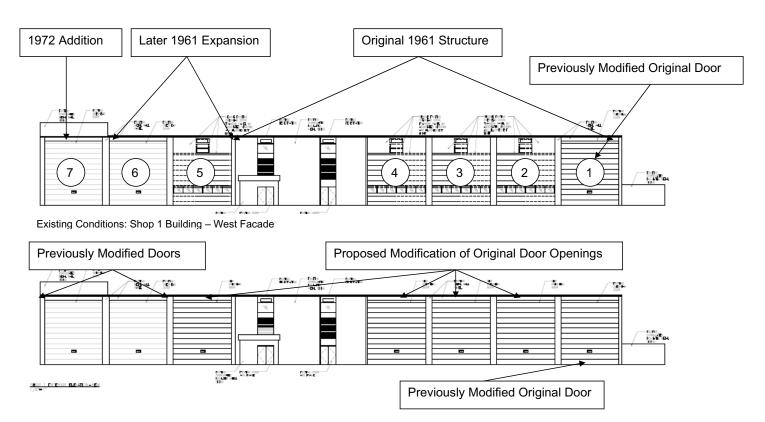


Figure 7: Shop 1 Building Extension (December 1961) Existing Doors 5-6



Figure 8: Shop 1 Building (Showing both sets of replacement doors)



Proposed Modification: Shop 1 Building – West Facade

Figure 9: Proposed Modifications to Shop 1 Doors - West Facade

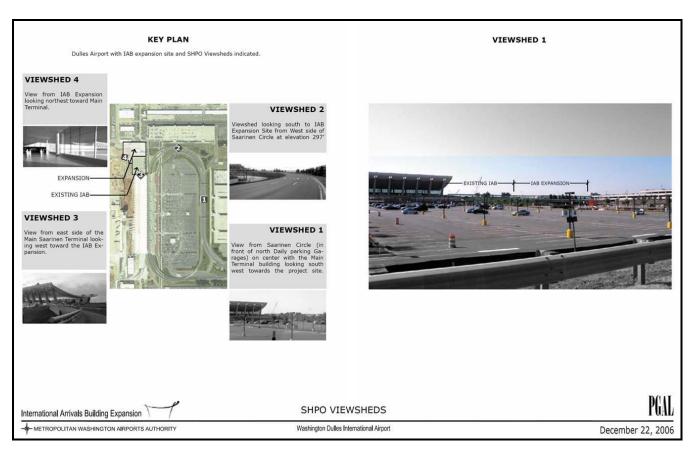


Figure 10: IAB Expansion – Key to Viewshed Analysis & Viewshed 1

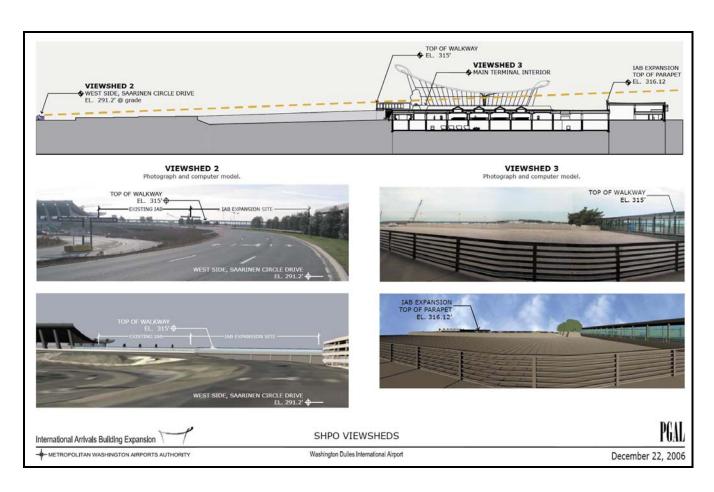


Figure 11: IAB Expansion – Viewshed 2 & 3



Figure 12A: IAB Building – Existing Conditions



Figure 12B: Proposed IAB Building Expansion – Exterior Perspective

MEMORANDUM OF AGREEMENT BETWEEN THE VIRGINIA STATE HISTORIC PRESERVATION OFFICE AND THE METROPOLITAN WASHINGTON AIRPORTS AUTHORITY FOR THE INTERNATIONAL ARRIVALS BUILDING EXPANSION WASHINGTON DULLES INTERNATIONAL AIRPORT

WHEREAS, the Metropolitan Washington Airports Authority (Authority), the Virginia State Historic Preservation Officer (SHPO) and Advisory Council on Historic Preservation (Council) executed a Programmatic Memorandum of Agreement (PMOA) on June 1, 1987 relating to the transfer of control over Washington National (now Reagan National) and Washington Dulles International Airports from the Federal Aviation Administration (FAA) to the Authority, and;

WHEREAS, the PMOA governs the handling of airport projects which may have an effect on properties eligible for inclusion in the National Register of Historic Places and provides that such projects will be handled in accordance with 36 CFR 800 with respect to review by the SHPO and the Council;

WHEREAS the Authority proposes to structurally expand the existing International Arrivals Building (IAB), to provide additional capacity for required Immigration and Naturalization Services and U.S. Customs Service functions, and;

WHEREAS the Area of Potential Effect (APE) for the undertaking was established in consultation with the SHPO, and has been determined to include the location of the Shop 1 and Shop 1 Annex and the surrounding area of the Main Terminal, the West Service Buildings complex as well as viewsheds from the airport roadway system, and;

WHEREAS, the Authority, in consultation with the SHPO pursuant to the PMOA, has determined that the proposed expansion of the International Arrivals Building (IAB) will result in adverse effects to contributing resources to the Dulles Airport Historic District (eligible for the National Register of Historic Places), including modification to the existing doors of Shop 1 and the demolition of the Shop 1 Annex Building, and;

WHEREAS, the Authority has invited the Advisory Council on Historic Preservation (Council) to participate in this consultation, and the Council has declined to participate, and;

WHEREAS, the FAA has elected to participate in the consultation and has been invited to concur with the terms of this Memorandum of Agreement, and;

WHEREAS, the Authority has developed a plan, in consultation with the SHPO, to inform and involve the public in Section 106 review through the NEPA public information process related to the development of a IAB Expansion Environmental Assessment and, pursuant to 36 CFR 800.2(d), shall specifically invite comments on the Section 106 process from previously identified potential Interested Parties; and shall take these public comments into account in the development of the final project plans;

NOW, THEREFORE, the Authority and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on the historic property;

Stipulations

Stipulation 1: Shop 1 and Shop 1 Annex

The Authority shall ensure that the following stipulations are met:

- 1.1) The Authority shall complete an analysis of alternative treatments to avoid or minimize the adverse effect on the Shop 1 and Shop 1 Annex and demonstrate that there are no feasible alternative treatments.
- 1.2) The Authority shall produce no later than 12 months after the execution of this agreement a historic architectural documentation to the standards of the Department of Historic Resources (which in Virginia is the SHPO) Intensive Survey Form of the Shop 1 and the Shop 1 Annex as well as the other West Service Buildings. This documentation shall include a historic context study that discusses the architectural relationship of these original service structures to the original Erro Saarinen Dulles Airport Master Plan. The Authority shall ensure that all documentation is completed and accepted by the VDHR prior to construction activities which may directly affect the Shop 1 Building, Shop 1 Annex or other West Service Building.
- 1.3) The IAB Expansion will be responsive to the historic and architectural qualities of the Dulles Airport Historic District, and take into consideration the recommended approaches to rehabilitation and new construction set forth in the Secretary of the Interior's <u>Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings</u> (U.S. Department of the Interior, National Park Service, 1992).
- 1.4) The Authority will provide the SHPO the opportunity to review and comment upon the IAB project design as they are developed at the 30%, 60%, and 90% stages. The Authority will take the comments of the SHPO into account in the continued development of the final project plans and specifications.

Stipulation 2: Professional Qualifications

The Authority shall ensure that all historic preservation work and mitigation documentation carried out pursuant to this Agreement is carried out by or under the supervision of a person or persons meeting at a minimum the Secretary of the Interior's *Professional Qualifications Standards* (48 FR 44716, Sept. 1983).

Stipulation 3: Equal Opportunity/Non-Discrimination

The Consulting Parties agree to comply with all applicable federal or state laws relating to equal opportunity and non-discrimination.

Stipulation 4: Non-Availability of Funding

This Agreement shall be subject to available funding and nothing in this Agreement shall bind State or Federal agencies to expenditures in excess of funds authorized and appropriated for the purposes outlined in the Agreement.

Stipulation 5: Confidentiality

Maintaining confidentiality of certain historic information is allowed under Section 304 of the National Historic Preservation Act. Therefore, the nature and location of certain historic properties discussed in the Agreement shall be maintained per 36 CFR Part 800.11(c).

Stipulation 6: Previously Unidentified Archeological Resources:

- 6.1) In the event that a previously unidentified archeological resource is discovered during ground disturbing activities, all construction work involving subsurface disturbance will be halted in the area of the resource and in the surrounding area where further subsurface remains can reasonably be expected to occur. The Authority and the SHPO, or an archeologist approved by them, immediately will inspect the work site and determine the area and the nature of the affected archeological property. Construction work may then continue in the project area outside the site area.
- 6.2) The Authority shall then notify the SHPO, the Tribal Historic Preservation Officer (THPO), and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to the affected property, and the Council within two working days of the discovery. The notification shall describe the Authority's assessment of National Register eligibility of the property and proposed actions to resolve the adverse effects. The

- SHPO/THPO, the Indian tribe or Native Hawaiian organization and the Council shall respond within two working days of the notification.
- 6.3) If the resource is determined to meet the National Register Criteria (36 CFR Part 60.6), the Authority shall ensure compliance with Section 800.13 of the Council's regulations. Work in the affected area shall not proceed until either (a) the development or implementation of appropriate data recovery or other recommended mitigation procedures, or (b) the determination is made that the located remains are not eligible for inclusion on the National Register.

Stipulation 7: Human Remains on Federal Land

- 7.1) Human remains and associated funerary objects of American Indian origin (prehistoric or historic) encountered during the course of actions taken as a result of this Agreement shall be treated in the manner consistent with the provisions of the Native American Graves Protection and Repatriation Act (25 U.S.C 3001) and its implementing regulations, 36 CFR. Part 10. Treatment must include consultation with any Federally-recognized American Indian tribe with an interest in the project, project area, or region.
- 7.2) Human remains of non-Indian origin shall be treated in a manner consistent with the *Virginia Antiquities Act*, Section 10.1-2305 of the *Code of Virginia*,
- 7.3) with the final regulations adopted by the Virginia Board of Historic Resources and published in the Virginia Register of July 15, 1991. A permit for archaeological removal and relocation of human remains meeting this criterion must be obtained from the SHPO.

Stipulation 8: Dispute Resolution

Should any party to this Agreement or member of the public object within 30 days to any actions proposed or carried out pursuant to this Agreement, the Authority shall consult with the objecting party to resolve the objection. The Authority shall notify the SHPO of any objection. If the Authority determines that the objection cannot be resolved, the Authority shall forward all documentation relevant to the dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:

- 8.1) Provide the Authority with recommendations, which the Authority will take into account in reaching a final decision regarding the dispute, or;
- 8.2) Notify the Authority that it will comment pursuant to 36 CFR Part 800.7(c), and proceed to comment. Any Council comment provided in response to such a request will be taken into account by the Authority in accordance with 36 CFR Part 800.7(c) (4) with reference to the subject of the dispute, or;

8.3) Any recommendation or comment provided by the Council will be understood to pertain only to the subject of the dispute; the Authority's responsibility to carry out all actions under this Agreement that is not subject of the dispute will remain unchanged.

Stipulation 9: Amendment

Any of the signatories may request that MOA be amended according to 36 CFR Part 800.6(c)(7). Any amendment will be effective on the date an amended Agreement is signed by all signatories. The Authority will ensure a copy of any executed amended Agreement is filed with the Advisory Council.

Stipulation 10: Duration

The Authority and the SHPO shall review this Agreement in five years from the year of the Agreement's execution to determine whether the Agreement needs to continue and whether any changes may be needed. The review and determinations may take place on a conference call or in a physical meeting as needed. Reviews of this MOA shall occur until the completion of the IAB expansion.

Stipulation 11: Termination

In the event the terms of the MOA cannot be or are not being carried out, the signatories shall consult to seek amendment of the Agreement. If an agreement cannot be reached on an amendment, the Authority or the SHPO may terminate it pursuant to 36 CFR Part 800.6(c) (8). Either a new Memorandum of Agreement will be executed under 36 CFR Part 800.6(c)(1) or the Advisory Council for Historic Preservation will be requested to comment pursuant to 36 CFR Part 800.7(a).

Execution of this Agreement, filing of the Agreement with the Council pursuant to 36 CFR Part 800.6(b) (1) (iv), and implementation of its terms is evidence that the Authority has taken into account the effects of the undertaking on historic properties protected under Section 106 of the National Historic Preservation Act and afforded the Council an opportunity to comment on the undertaking pursuant to that Act.

EXECUTION OF THIS MEMORANDUM OF AGREEMENT and the implementation of its terms evidence that the Authority has complied with the terms of the 1987 Programmatic Memorandum of Agreement (as regards Section 106 of the National Historic Preservation Act (36 CFR Part 800) and Section 4(f) of the Department of Transportation Act (23 U.S.C. 138)).

METROPOLITAN WASHINGTON AIRPORTS AUTHORITY

Date: 3/22/07
James/E. Bennett
President and Chief Executive Officer
Metropolitan Washington Airports Authority
Wedopontan Washington Amports Authority
GINIA STATE HISTORIC PRESERVATION OFFICER
Date:
Kathleen S. Kilpatrick
Deputy, Virginia State Historic Preservation Officer
urring:
ERAL AVIATION ADMINISTRATION
Date:

Manager, FAA Washington Airports District Office

Terry J. Page