



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

Eastern Service Center

1701 Columbia Avenue
College Park, Georgia 30337

October 12, 2021

Ms. Brona Simon
State Historic Preservation Officer/Executive Director
Massachusetts Historical Commission
220 Morrissey Blvd
Boston, MA 02125

Reference: Follow up on Proposed Finding of No Adverse Effect for the Boston Logan International Airport RNAV (GPS) RWY 4L Approach Procedure, Boston, MA (MHC# RC.68314)

Dear Ms. Simon,

Your letter dated September 10, 2021, stating your non-concurrence with our proposed finding of “no adverse effect” was received by the Federal Aviation Administration (FAA) on September 21, 2021 and we have prepared the following additional information.

To address the issues raised in your letter, we can confirm that FAA did reach out to all of the organizations identified in the Massachusetts Historic Commission (MHC) letter dated July 24, 2020 as possible consulting parties:

- All Local Historical Commissions of the cities and towns in the Area of Potential Effects (APE)
- All Regional Planning Commission in the APE
- Air Inc.
- Eagle Hill Civic Association
- Fair Skies Nation

A letter inviting participation as a consulting party was sent to historical commissions and planning boards from Milton, Quincy, Stoughton, Sharon, Randolph, Norton, Mansfield, Canton, Easton, Foxborough, and Boston, Massachusetts. The Mashpee Wampanoag Tribe, and the Wampanoag Tribe of Gay Head were invited to participate in consultation by letters sent June 9, 2021. Air Inc., Eagle Hill Civic Association, Fair Skies Nation, were also invited to participate in consultation, for a total of twenty-seven parties. The Proposed Finding was mailed via USPS to all of these organizations in June 2021 with a signature confirmation with the exceptions of Fair Skies Nation and the Eagle Hill Civic Association to whom the Proposed Finding was emailed. Confirmation of receipt was obtained for all of these potential consulting parties.

The only responses received to date have been from the Foxborough Historical Commission and a recent email from Fair Skies Nation. The letter from the Foxborough Historical Commission, which was previously shared with the MHC in the FAA’s package dated August 9th, 2021, stated that the Foxborough Historical Commission “does not believe that this will have any impact on

any historical property in the town.” The email from Fair Skies Nation, which was received on September 19, 2021 stated that “implementation of the 4L RNAV actually would help relieve some of the excessive noise and pollution that residents and historic areas under the overused 4R path experience.” That email from Fair Skies Nation, received by the FAA on September 19, 2021, is included here per your request for all comments related to the Proposed Finding.

The public information session hosted by Massport on September 23, 2021, referenced in your September 10th letter, concerned a different project: the Boston Logan RNAV Study and the Block 2 Recommendations. This study, which is a collaborative effort involving Massachusetts Port Authority (Massport), the FAA, and experts from the Massachusetts Institute of Technology (MIT) to attempt to address the effect of aircraft noise while maintaining safety at the airport, is a separate undertaking than the Proposed RNAV (GPS) RWY 4L Approach Procedure. The confusion between that project and this undertaking may have arisen because in the methodology described in the FAA letter dated October 29, 2020 for selecting an APE for this project, the descriptor “BLOCK2” was used to describe an area of land for the overflight analysis. This “BLOCK2” has been recreated in Attachment A and is simply a polygon around the Proposed Procedure, which was used to estimate overflights in the area of the Proposed Action. This “BLOCK2” polygon was introduced to help establish an APE for this undertaking and is not related to the Block 2 recommendations referenced in the September 23, 2021 meeting. The use of similar terminology for the two unrelated projects is simply coincidental. Therefore, the comments from this recent meeting are not included in this correspondence.

The FAA would like to continue consultation regarding the Proposed Finding and better understand MHC’s position that the undertaking would meet the criterion of adverse effects cited in your letter (36 CFR 800.5(2)(v)). Specifically, FAA seeks further information on the types of resources the MHC believes would be adversely affected by the undertaking through the introduction of visual or audible elements, given that the area is already heavily overflowed.

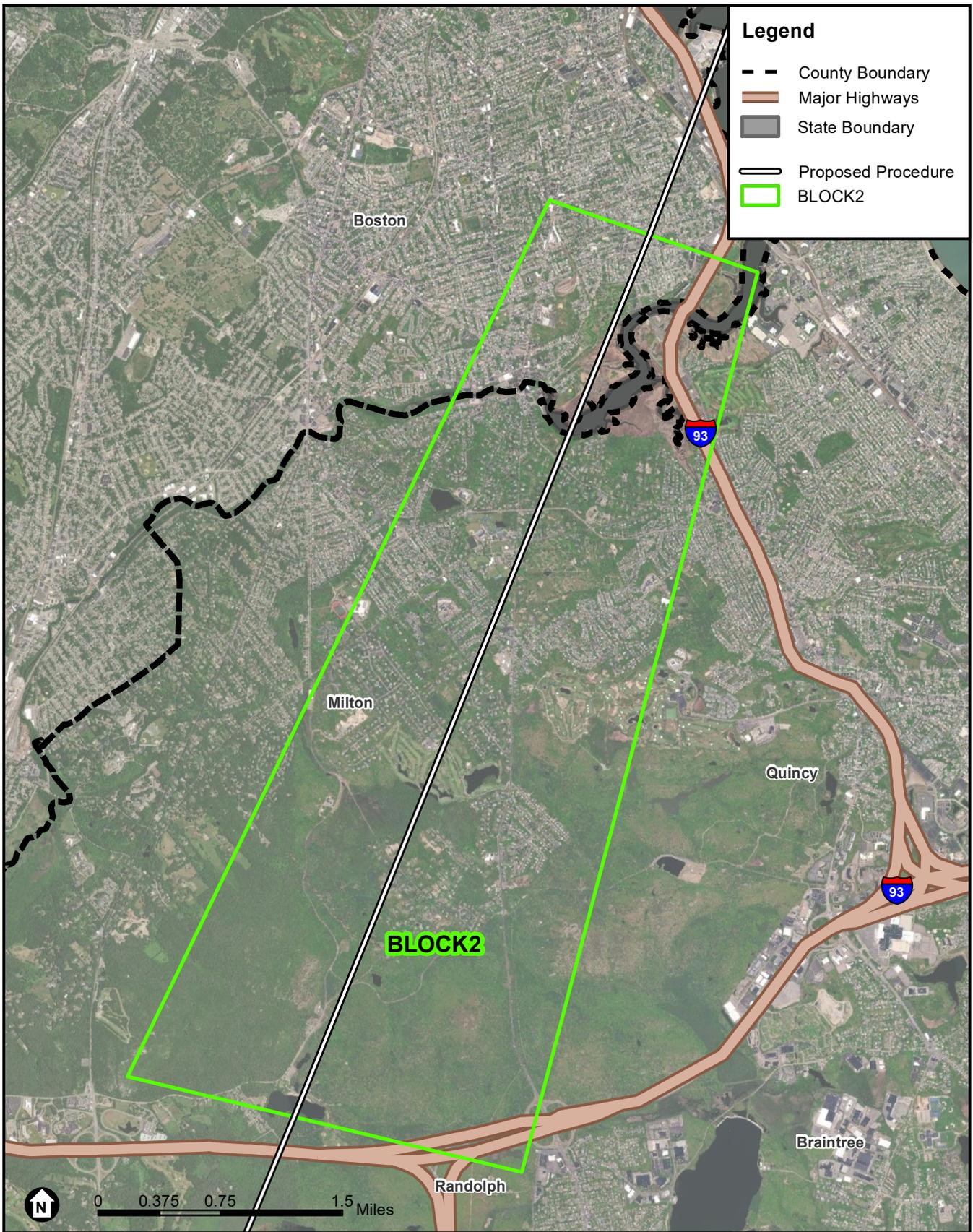
In our June 10, 2021 letter proposing a finding of “no adverse effect” we described our methodology for assessing auditory and visual impacts to the historic properties where a quiet setting is a generally recognized purpose and attribute.¹ MHC’s September 10th letter states that the proposed undertaking “will concentrate flights in a more precise vertical and horizontal track” but does not provide an explanation of how any such concentration would diminish the integrity of significant historic features of properties in the APE. With a better understanding of the basis for MHC’s non-concurrence, FAA may be able to provide additional information or analysis that might help us to reach consensus.

¹ Because this undertaking does not require land acquisition, construction, or ground disturbance, the FAA focused its “reasonable and good faith effort to carry out appropriate identification efforts” on properties for which setting and feeling are characteristics contributing to the property’s National Register eligibility and where integrity of significant historic features could be affected by the introduction of visual or audible elements.

If the MHC is open to further discussion, we would welcome a Zoom meeting to facilitate continued consultation that could assist in clarifying the Proposed Finding for this project. The meeting could be recorded so it could be presented as part of the record of correspondence between the FAA and the MHC. Please respond by contacting me at 404-305-5598, or at veronda.johnson@faa.gov to indicate how you would like to proceed.

Sincerely,

Veronda Johnson
Eastern Service Center
Federal Aviation Administration
Operations Support Group AJV-E250
1701 Columbia Avenue
College Park, GA 30337



SOURCE: Esri; RoVolus, 2021; ESA, 2021

Boston Logan RNAV (GPS) RWY 4L EA



From: BOS FAIR SKIES <bosfairskies@gmail.com>
Sent: Sunday, September 19, 2021 11:04 PM
To: mhc@sec.state.ma.us; Johnson, Veronda (FAA) <Veronda.Johnson@faa.gov>
Subject: FAA's 4L proposed RNAV approach path

BOS Fair Skies received a copy of a 9/10/21 letter from Brona Simon, Executive Director Massachusetts Historical Commission, to Ms. Veronda Johnson at the FAA about the FAA's proposed RNAV flight path for Runway 4L approaches to Logan Airport. Air Inc, a group we collaborate with on many efforts, shared the letter with BOS Fair Skies.

Implementation of the 4L RNAV actually would help relieve some of the excessive noise and pollution that residents and historic areas under the overused 4R path experience. In 2019, those under the 4R flightpath had 9 aviation noise events for every 1 to 4L. The two RNAV approach paths to 4L should be used to disperse the planes from 4R to an area that has few fly overs when compared to those under the 4R path, which also affects residents and historic places in Quincy and Braintree.

If you would like more information about why the 4L RNAV path is needed for dispersion, equity, and fairness, please respond to this email and ask that your response be forwarded to Phil Johenning or Cindy L. Christiansen. One or both of them will connect with you directly. Thanks.

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NOTE: BOS Fair Skies is not associated with Fair Skies Nation