

Comments on
APE

Braswell, Aaron (FAA)

From: Leslie Barras <lebarras@gmail.com>
Sent: Tuesday, March 08, 2016 7:08 AM
To: Braswell, Aaron (FAA)
Cc: Potts, Craig A. (Heritage Council); Johnson, Cynthia; info@cityofkingsley.org; Owen, Tom; Hollander, Bill H.; Zinniel, Mimi M; David B-personal; brent.ackerson@louisvilleky.gov; Sinnwell, Brian; Skip.Miller@flylouisville.com; thaskell@hanson-inc.com; MJenkins@hanson-inc.com; RAnderson@hanson-inc.com; Dupree, Tommy (FAA); Braden, Phillip (FAA); patriciastallings@brockington.org; Tom FitzGerald; Rachel Kennedy; Phyllis Hawkins; jchris.mccoy@gmail.com; Nicolas.Laracuente@ky.gov; Johnson, Duane (FAA); Stovall, Jamal (FAA); Chris McCoy; Jennifer Ryall, KHC; Ethridge, Kyle; Long, Terra L
Subject: Bowman Field APE

March 8, 2016

Mr. Braswell,

This email communication responds to your email of February 22, 2016 requesting consulting party comments on APE Exhibit 20150922, regarding the Bowman Field Safety Program.

Plea For The Trees submitted extensive comments on the APE in its July 10, 2015 submittal to your office. It is not clear that any of our comments are addressed in this draft APE. Further, we understood from the last consultation meeting on August 20, 2015 that FAA based the visual effect APE on a field survey that would be provided to the consulting parties. This survey would be particularly helpful in understanding why the FAA believes there will not be **potential** visual effects in the area between (and including a portion of) Seneca Park and the historic neighborhoods north of the Runway 6 APE and in the historic neighborhoods between Runways 6 and 33. We have not yet been provided this document.

We believe the current draft exhibit continues to fail to reflect the Area of **Potential** Effect that fully accounts for the indirect visual and noise effects of the proposed removal of hundreds of mature canopy trees. The APE needs to be expanded to constitute a circular APE (the "full APE") that connects the outmost edge of each of the narrow APEs associated with the four runways and includes Bowman Field itself.

Leslie Barras

Plea For The Trees

On Mon, Feb 22, 2016 at 4:05 PM, <Aaron.Braswell@faa.gov> wrote:

Dear Consulting Party Members,

The Federal Aviation Administration (FAA) Memphis Airports District Office (MEM-ADO) hereby invites you to comment on the Area of Potential Effect (APE) for the proposed obstruction mitigation undertaking, known as the Area Safety Program, at Bowman Field Airport (LOU) in Louisville, Kentucky. The FAA MEM-ADO proposes to use the APE as defined in the attached drawing (APE Exhibit 20150922 [Note that proposed APE is shown is broken black lines around the airspace surfaces depicted in the drawing]) prior to completing identification and assessment of historic resources. As lead federal agency, the FAA MEM-ADO believes the proposed APE is reasonable based on the scope of the proposed undertaking. I would like to point out, that the FAA MEM-ADO has determined that an alternative using lights to mitigate obstructions would not be reasonable or practicable. The paragraphs below my signature provide more detail on the FAA MEM-ADO determination on the lighting alternative. An additional attachment will be sent momentarily as part of the lighting alternative determination. **In order to keep the Section 106 process moving forward, I ask that you submit comments to me by no later than 5:00 PM (ET) March 8, 2016.** Comments may be issued by email or mail. If you have any questions, please feel welcome to contact me by responding to this email or calling me at the number below.

Thank you,

Aaron Braswell

Environmental Protection Specialist

Federal Aviation Administration

Memphis Airports District Office

2600 Thousand Oaks Boulevard

Suite 2250

Memphis, TN 38118

Phone: 901-322-8192

Lighting Alternative Determination:

As currently indicated by the most recent aeronautical survey, there are approximately 200 trees (clusters) that impact Runways 6-24 and 15-33. In accordance with FAA's Advisory Circular 70/7460-1L, "Obstruction Marking and Lighting", lighting of all 200 tree (clusters) would not be required; however, even given this criteria, there still would be a substantial amount of lighting required as shown in the attached exhibit (Alternative 2, Exhibit 5).

The process to determine the use of obstruction lights to mitigate obstructions to airspace surfaces would (1) require the airport sponsor to develop an obstruction lighting layout similar to the attached exhibit; (2) this would include the obstruction light poles/structures that would need to be reviewed and approved under FAA's airspace evaluation process; (3) the obstruction lighting plan would then be submitted to the FAA Flight Standards Procedures Review Board for a formal review and acceptance as mitigation; (4) and, if approved, the airport sponsor could then proceed to implement the lighting plan as approved.

We have determined that even if an obstruction lighting plan to address the existing obstructions is developed, submitted, and approved, its impact on residential, recreational, and historic properties would be more intrusive visually and practically than an alternative of tree trimming or removal. Our determination is based on the following:

- (1) While 200 lighting structures may not be required, there still would be considerable light emissions on numerous properties.
- (2) The obstruction lights would have to be mounted on separate poles/structures and located higher than the obstructions they would address.
- (3) The obstruction lights would require maintenance easements from property owners to supply power to and maintain the lights.
- (4) The tree canopy surrounding the obstruction lights would still need to be kept below the lights. Therefore, there still would be a need to trim trees to maintain the effectiveness of the lighting and their acceptance as mitigation.

Braswell, Aaron (FAA)

From: Zinniel, Mimi M <Mimi.Zinniel@olmstedparks.org>
Sent: Tuesday, March 08, 2016 9:25 PM
To: Braswell, Aaron (FAA)
Subject: Re: Bowman Field APE

Mr. Braswell -

I am concerned that the comments already submitted by me and others from Plea for the Trees regarding the inadequate APE parameters surrounding Bowman Field goal have not been considered by you, the FAA or the LRAA. Could you please provide a comprehensive list of the questions and concerns that have been voiced (in our meetings and in writing) with your responses to each? I am certain the Section 106 process can not succeed without your due consideration of our comments.

Thank you.

Mimi Zinniel

Mimi Zinniel
502-541-3202

On Feb 22, 2016, at 5:05 PM, "Aaron.Braswell@faa.gov" <Aaron.Braswell@faa.gov> wrote:

Dear Consulting Party Members,

The Federal Aviation Administration (FAA) Memphis Airports District Office (MEM-ADO) hereby invites you to comment on the Area of Potential Effect (APE) for the proposed obstruction mitigation undertaking, known as the Area Safety Program, at Bowman Field Airport (LOU) in Louisville, Kentucky. The FAA MEM-ADO proposes to use the APE as defined in the attached drawing (APE Exhibit 20150922 [Note that proposed APE is shown is broken black lines around the airspace surfaces depicted in the drawing]) prior to completing identification and assessment of historic resources. As lead federal agency, the FAA MEM-ADO believes the proposed APE is reasonable based on the scope of the proposed undertaking. I would like to point out, that the FAA MEM-ADO has determined that an alternative using lights to mitigate obstructions would not be reasonable or practicable. The paragraphs below my signature provide more detail on the FAA MEM-ADO determination on the lighting alternative. An additional attachment will be sent momentarily as part of the lighting alternative determination. **In order to keep the Section 106 process moving forward, I ask that you submit comments to me by no later than 5:00 PM (ET) March 8, 2016.** Comments may be issued by email or mail. If you have any questions, please feel welcome to contact me by responding to this email or calling me at the number below.

Thank you,

Aaron Braswell
Environmental Protection Specialist
Federal Aviation Administration
Memphis Airports District Office
2600 Thousand Oaks Boulevard

Lighting Alternative Determination:

As currently indicated by the most recent aeronautical survey, there are approximately 200 trees (clusters) that impact Runways 6-24 and 15-33. In accordance with FAA's Advisory Circular 70/7460-1L, "Obstruction Marking and Lighting", lighting of all 200 tree (clusters) would not be required; however, even given this criteria, there still would be a substantial amount of lighting required as shown in the attached exhibit (Alternative 2, Exhibit 5).

The process to determine the use of obstruction lights to mitigate obstructions to airspace surfaces would (1) require the airport sponsor to develop an obstruction lighting layout similar to the attached exhibit; (2) this would include the obstruction light poles/structures that would need to be reviewed and approved under FAA's airspace evaluation process; (3) the obstruction lighting plan would then be submitted to the FAA Flight Standards Procedures Review Board for a formal review and acceptance as mitigation; (4) and, if approved, the airport sponsor could then proceed to implement the lighting plan as approved.

We have determined that even if an obstruction lighting plan to address the existing obstructions is developed, submitted, and approved, its impact on residential, recreational, and historic properties would be more intrusive visually and practically than an alternative of tree trimming or removal. Our determination is based on the following:

- (1) While 200 lighting structures may not be required, there still would be considerable light emissions on numerous properties.
- (2) The obstruction lights would have to be mounted on separate poles/structures and located higher than the obstructions they would address.
- (3) The obstruction lights would require maintenance easements from property owners to supply power to and maintain the lights.
- (4) The tree canopy surrounding the obstruction lights would still need to be kept below the lights. Therefore, there still would be a need to trim trees to maintain the effectiveness of the lighting and their acceptance as mitigation.

Braswell, Aaron (FAA)

From: Chris McCoy <j.chris.mccoy@gmail.com>
Sent: Wednesday, March 09, 2016 9:58 AM
To: Braswell, Aaron (FAA)
Subject: Fwd: Bowman Field APE
Attachments: EXB-LOU_Lighting_Alternative (small)-20151217.pdf; APE Exhibit (small) 20150922.pdf

Mr. Braswell,

There appears to be no difference between the most recent APE and its predecessor. I can only assume that all previous comments (my own and others) either were not considered or were for some reason completely discounted in the production of this latest version. As there has been no discernible change made to the APE, all of my previous comments on the issue still apply. A summary of those comments would be that the current APE is woefully inadequate in representing the true geography of the areas that will be affected by this project.

If it so happens that my previous comments on the APE were considered but dismissed, I do not think it unreasonable to expect a response from the FAA that provides an explanation for why my concerns (and the concerns of all who have previously commented) were not reflected in a redrawn APE.

Respectfully submitted,

Chris McCoy

----- Forwarded message -----

From: <Aaron.Braswell@faa.gov>
Date: Tue, Feb 23, 2016 at 1:40 PM
Subject: RE: Bowman Field APE
To: craig.potts@ky.gov, cynthia.johnson@louisvilleky.gov, info@cityofkingsley.org, tom.owen@louisvilleky.gov, bill.hollander@louisvilleky.gov, Mimi.Zinniel@olmstedparks.org, lebarras@gmail.com, d.l.b.2547@gmail.com, brent.ackerson@louisvilleky.gov, Brian.Sinnwell@flylouisville.com, Skip.Miller@flylouisville.com, thaskell@hanson-inc.com, MJenkins@hanson-inc.com, RAnderson@hanson-inc.com, Tommy.Dupree@faa.gov, Phillip.Braden@faa.gov, patriciaastallings@brockington.org, fitzkrc@aol.com, director@preservationkentucky.org, drphawkins@juno.com, jchris.mccoy@gmail.com, Nicolas.Laracuente@ky.gov, Duane.Johnson@faa.gov, Jamal.Stovall@faa.gov

All,

It appears that some of you may not have received one or both emails sent yesterday due to email file size restrictions. I have resized the graphic images and have attached for your review. Below is the original email. The second email was used only to transmit one of the two graphic image files. If you have any questions, please let me know.

Thank you,

Aaron Braswell

Environmental Protection Specialist

Federal Aviation Administration

Memphis Airports District Office

2600 Thousand Oaks Boulevard

Suite 2250

Memphis, TN 38118

Phone: 901-322-8192

From: Braswell, Aaron (FAA)

Sent: Monday, February 22, 2016 4:05 PM

To: Potts, Craig A. (Heritage Council); cynthia.johnson@louisvilleky.gov; info@cityofkingsley.org; tom.owen@louisvilleky.gov; bill.hollander@louisvilleky.gov; Zinniel, Mimi M; Leslie Barras; d.l.b.2547@gmail.com; brent.ackerson@louisvilleky.gov; brent.ackerson@louisvilleky.gov; Sinnwell, Brian; Miller, Skip; Tim Haskell - Hanson (thaskell@hanson-inc.com); Melissa Jenkins; Rodger Anderson; Dupree, Tommy (FAA); Braden, Phillip (FAA); patriciastallings@brockington.org; Tom FitzGerald; director@preservationkentucky.org; Phyllis Hawkins; jchris.mccoy@gmail.com; 'Laracuenta, Nicolas (Heritage Council)'; Johnson, Duane (FAA); Stovall, Jamal (FAA)

Subject: Bowman Field APE

Dear Consulting Party Members,

The Federal Aviation Administration (FAA) Memphis Airports District Office (MEM-ADO) hereby invites you to comment on the Area of Potential Effect (APE) for the proposed obstruction mitigation undertaking, known as the Area Safety Program, at Bowman Field Airport (LOU) in Louisville, Kentucky. The FAA MEM-ADO proposes to use the APE as defined in the attached drawing (APE Exhibit 20150922 [Note that proposed APE is shown is broken black lines around the airspace surfaces depicted in the drawing]) prior to completing identification and assessment of historic resources. As lead federal agency, the FAA MEM-ADO believes the proposed APE is reasonable based on the scope of the proposed undertaking. I would like to point out, that the FAA MEM-ADO has determined that an alternative using lights to mitigate obstructions would not be reasonable or practicable. The paragraphs below my signature provide more detail on the FAA MEM-ADO determination on the lighting alternative. An additional attachment will be sent momentarily as part of the

lighting alternative determination. **In order to keep the Section 106 process moving forward, I ask that you submit comments to me by no later than 5:00 PM (ET) March 8, 2016.** Comments may be issued by email or mail. If you have any questions, please feel welcome to contact me by responding to this email or calling me at the number below.

Thank you,

Aaron Braswell

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Lighting Alternative Determination:

As currently indicated by the most recent aeronautical survey, there are approximately 200 trees (clusters) that impact Runways 6-24 and 15-33. In accordance with FAA's Advisory Circular 70/7460-1L, "Obstruction Marking and Lighting", lighting of all 200 tree (clusters) would not be required; however, even given this criteria, there still would be a substantial amount of lighting required as shown in the attached exhibit (Alternative 2, Exhibit 5).

The process to determine the use of obstruction lights to mitigate obstructions to airspace surfaces would (1) require the airport sponsor to develop an obstruction lighting layout similar to the attached exhibit; (2) this would include the obstruction light poles/structures that would need to be reviewed and approved under FAA's airspace evaluation process; (3) the obstruction lighting plan would then be submitted to the FAA Flight Standards Procedures Review Board for a formal review and acceptance as mitigation; (4) and, if approved, the airport sponsor could then proceed to implement the lighting plan as approved.

We have determined that even if an obstruction lighting plan to address the existing obstructions is developed, submitted, and approved, its impact on residential, recreational, and historic properties would be more intrusive visually and practically than an alternative of tree trimming or removal. Our determination is based on the following:

(1) While 200 lighting structures may not be required, there still would be considerable light emissions on numerous properties.

- (2) The obstruction lights would have to be mounted on separate poles/structures and located higher than the obstructions they would address.
- (3) The obstruction lights would require maintenance easements from property owners to supply power to and maintain the lights.
- (4) The tree canopy surrounding the obstruction lights would still need to be kept below the lights. Therefore, there still would be a need to trim trees to maintain the effectiveness of the lighting and their acceptance as mitigation.

Lighting Alternative Description:

As currently indicated by the most recent topographical survey, there are approximately 700 trees (of various species) located within the project boundary. In accordance with FAA's Advisory Circular 705-01-11, "Obstruction Lighting and Lighting", lighting of all 200 foot structures would not be required; however, existing on this project, there will be a substantial amount of lighting required as shown in the attached exhibit (Alternative 2, Exhibit 2).

The process to determine the use of obstruction lights to mitigate obstructions to airspace surfaces would (1) require the airport sponsor to develop an obstruction lighting layout similar to the attached exhibit (2) this would include the obstruction light pole structure that would need to be reviewed and approved under FAA's airport evaluation process; (3) the obstruction lighting plan would need to be submitted to the FAA Light Standard Procedures Review Board for a formal review and acceptance as mitigation; (4) and if approved, the airport sponsor could then proceed to implement the lighting plan as required.

We have determined that even if an obstruction lighting plan to address the existing obstructions is developed, submitted, and approved, its impact on residential, recreational, and historic properties would be non-detrimental and would not result in the adverse effects of the planning or removal. Our determination is based on the following:

- (1) While 200 foot structures may not be required, there still would be considerable light pollution on