No. _____ 15-1285

In The United States Court of Appeals for the District of Columbia
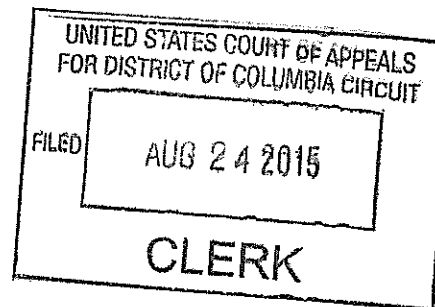
CITIZENS ASSOCIATION OF GEORGETOWN; BURLEITH CITIZENS ASSOCIATION; FOXHALL CITIZENS ASSOCIATION; HILLANDALE CITIZENS ASSOCIATION; COLONY HILL NEIGHBORHOOD ASSOCIATION; PALISADES CITIZENS ASSOCIATION; FOGGY BOTTOM CITIZENS ASSOCIATION; GEORGETOWN UNIVERSITY; GEORGETOWN UNIVERSITY STUDENT ASSOCIATION,

Petitioners,

v.

FEDERAL AVIATION ADMINISTRATION;
MICHAEL HUERTA, Administrator,
Federal Aviation Administration

Respondents.

PETITION FOR REVIEW

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Attorneys for Petitioners CITIZENS ASSOCIATION OF GEORGETOWN, ET AL.

Pursuant to 49 U.S.C. § 46110 and Rule 15(a) of the Federal Rules of Appellate Procedure, the Citizens Association of Georgetown, the Burleith Citizens Association, the Foxhall Citizens Association, the Hillandale Homeowners Association, the Colony Hill Neighborhood Association, the Palisades Citizens Association, the Foggy Bottom Citizens Association, the Georgetown University, and the Georgetown University Student Association ("Petitioners") hereby petition the United States Court of Appeals for the District of Columbia Circuit for review of final decisions by the Federal Aviation Administration ("FAA") to permanently implement certain flight arrival and departure routes at Ronald Reagan Washington National Airport ("DCA") in violation of the National Environmental Policy Act ("NEPA") and without addressing — and, in some cases, without even responding to — significant concerns raised by Petitioners and their members.

Petitioners are a private university and its student government, as well as non-profit neighborhood groups representing the Georgetown, Burleith, Foxhall, Hillandale, Colony Hill, Palisades, and Foggy Bottom neighborhoods of Washington, D.C. (the "Neighborhoods"). Georgetown University contains buildings listed on the National Register of Historic Places, an official and exclusive inventory, maintained by the Secretary of the Interior, which consists of

resources determined to be "significant in American history...and culture." 54

U.S.C. § 302101. Healy Hall at Georgetown University is also a National Historic

Landmark. Each of the Neighborhoods contains properties eligible for listing in

the National Register of Historic Places.

The University, its resident students, and the Neighborhoods and their

residents have suffered — and will continue to suffer — significant, adverse

impacts as a result of the FAA's flight arrival and departure routes.

FAA's decision with respect to the flight arrival and departure routes was

finalized, published, and implemented by the FAA on June 25, 2015, as reflected

on the list of route decisions on FAA's online flight procedures data portal.[1]

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[1]

https://www.faa.gov/air_traffic/flight_info/aeronav/procedures/application/?event=p
rocedure.results&tab=productionPlan&nasrId=DCA#searchResultsTop . A printed
copy of the relevant portion of the flight procedures data portal is attached hereto as
Exhibit A.

RULE 26.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1, Petitioners, by and through their counsel, hereby disclose that:

A.   The Citizens Association of Georgetown ("CAG") is a non-profit corporation. There is no parent corporation for CAG. There is no publicly held corporation or investment fund that holds a 10% or more ownership interest in CAG. CAG was organized for the improvement and protection of the neighborhood.

B.   The Burleith Citizens Association ("Burleith") is a non-profit corporation. There is no parent corporation for Burleith. There is no publicly held corporation or investment fund that holds a 10% or more ownership interest in Burleith. Burleith was organized for the improvement and protection of the neighborhood.

C.   The Foxhall Citizens Association ("Foxhall") is a non-profit corporation. There is no parent corporation for Foxhall. There is no publicly held corporation or investment fund that holds a 10% or more ownership interest in Foxhall. Foxhall was organized for the improvement and protection of the neighborhood.

D.   The Hillandale Homeowners Association ("Hillandale") is a non-profit corporation. There is no parent corporation for Hillandale. There is no publicly held corporation or investment fund that holds a 10% or more ownership interest in Hillandale. Hillandale was organized for the improvement and protection of the neighborhood.

E.   The Colony Hill Neighborhood Association ("Colony Hill") is a non-profit corporation. There is no parent corporation for Colony Hill. There is no publicly held corporation or investment fund that holds a 10% or more ownership interest in Colony Hill. Colony Hill was organized for the improvement and protection of the neighborhood.

F.   The Palisades Citizens Association ("Palisades") is a non-profit corporation. There is no parent corporation for Palisades. There is no publicly held corporation or investment fund that holds a 10% or more ownership interest in Palisades. Palisades was organized for the improvement and protection of the neighborhood.

G.   The Foggy Bottom Citizens Association ("Foggy Bottom") is a non-profit corporation. There is no parent corporation for Foggy Bottom. There is no publicly held corporation or investment fund that holds a 10% or more ownership interest in Foggy Bottom. Foggy Bottom was organized for the improvement and protection of the neighborhood.

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H.   Georgetown University ("Georgetown") is a private research university in Washington, D.C.   Founded in 1789, it is the oldest Catholic and Jesuit institution of higher education in the United States. There is no parent corporation and no publicly held corporation or investment fund that holds a 10% or more ownership interest in Georgetown.

I.   Georgetown University Student Association ("GUSA") is the student government of Georgetown University in Washington, D.C. GUSA serves as the voice of the undergraduate populace, and it affects nearly all aspects of student life. Georgetown is the parent corporation of GUSA, and no publicly held corporation or investment fund that holds a 10% or more ownership interest in GUSA.

Dated: August 24, 2015

                              Respectfully submitted,

                              DENTONS US LLP
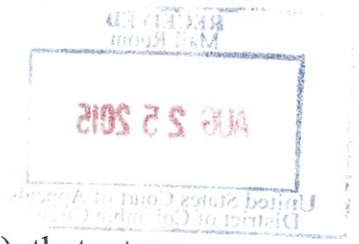
                              By _Nicholas C. Yost /JUL___
                                    Nicholas C. Yost[2]

_____

[2] Mr. Yost is admitted to practice in this court (USDC-DC Bar No. 968289). He is admitted to the District of Columbia Bar, but his membership is currently inactive;

Matthew G. Adams
James W. Rubin
Attorneys for Petitioners

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he is an active member of the California Bar and practices under that membership
(CA Bar No. 35297).

CERTIFICATE OF SERVICE

I hereby certify, in accordance with Fed. Rule of App. Proc. 15(c)(1), that a true

copy of the foregoing Petition for Review and attachments were served by US mail

on this 24th day of August, 2015 on the following:

Federal Aviation Administration
800 Independence Avenue SW
Washington DC 20591
Telephone: 202- 267-8738

Michael Huerta
Administrator
Federal Aviation Administration
Room E1010
800 Independence Avenue, SM
Washington, DC 20591
Telephone: 202- 267-3111

U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
Telephone: 202-514-2000

James W. Rubin

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**Federal Aviation
Administration**

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DCA WASHINGTON/RONALD REAGAN WASHINGTON NATIONAL

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IFP Production Plan - Current IFPs under Development or Amendments with Tentative Publication Date and Status.

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