

22 August 2014

Ms. Lana Furra  
Assistant Director  
City of Dallas Department of Aviation  
Dallas Love Field  
Dallas, TX 75235

RE: CONSULTING PARTY ENVIRONMENTAL ASSESSMENT RESPONSE

Ms. Furra:

As a consulting party for the historic Braniff Operations and Maintenance Base, we are in receipt of the draft entitled “Redevelopment of the DalFort Site Environmental Assessment” dated July 2014. After review of the three options proposed in the document, Flying Crown Land Group is in support of Option 2.1.3 identified as “Remediation, Rehabilitation, and Adaptive Reuse of the Dalfort Site”. We continue to appreciate the cooperation of the Department of Aviation and Federal Aviation Administration in protection of aviation history through preservation of this site.

We would like to take the opportunity to address two key points that would be strengthened by clarification in a final EA document. We believe lack of a clear definition as to what constitutes the definition of the “OMB” could lead to confusion.

*Section 3.6 states “Due to recent Section 106 consultation regarding the DalFort site, the largest facility on the site (the OMB) is considered eligible for listing in the NRHP...”, and “There are no other properties subject to Section 4(f) of the DOT Act located within the APE.”*

Further, clarity around the definition is also important because the identifying exhibits (Exhibit 1-3) in the EA refer to a part of the original construction as “Legend Terminal”. Our recommendation is to define the OMB as the main structure and the “North Annex” per the original Luckman & Pereira as-built plans of 1956-1958 and would be consistent to the contributing structures identified in the Keeper’s decision. Since the warehouse, or *stores* as they were referred to by the architects were added onto shortly after initial construction for the sole purpose of expanding its intended use, this addition is considered historically contributing. In our opinion, a failure to define OMB in the EA would jeopardize our long term support and constitute an adverse effect

Second, maintaining the structure currently occupied by the Customs and Border Protection as stated in Section 2.1.3 of the draft EA would diminish and adversely effect the integrity of the restoration in direct violation of the seven mandates from the applicable codes governing historic protection. Since the structure was added in 1999/2000 specifically for the operation of Legend Airlines, it was clearly a non-contributing structure to the site and is not appropriate. A proper and effective restoration would return the exterior wall to its original condition and remove the 2000 (or 1995 as it is referred to in the initial Geo-Marine report) structure. We encourage further conversation regarding this part of the building as plans move forward to fully comply with the law. Should the CBP structure remain, we believe this constitutes adverse effect and would not support any plan which includes maintaining the non-contributing structure.

We continue to stand by the Department of Aviation in their efforts and appreciate the thoughtful nature of the process and protection efforts. The result will be a successful example of adaptive reuse of the property and greatly contribute to the economic engine of Dallas. Please do not hesitate to contact us should you have any questions regarding our correspondence.

Respectfully Submitted,



Stephen Birch  
Managing Director

Cc: Mr. Justin Kockritz, Texas Historical Commission  
Mr. David Preziosi, Preservation Dallas  
Mr. Richard Cass, Braniff Preservation Group  
Mr. John MacFarlane, FAA Southwest Region  
Mr. Dean McMath, FAA Southwest Region  
Mr. Mark Duebner, City of Dallas Department of Aviation

spb/AKL