



HOPE HALLECK
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September 12, 2016

Mr. Carmine Gallo
Eastern Regional Administrator
Federal Aviation Administration
United States Department of Transportation
1 Aviation Plaza
Jamaica, NY 11434-4809

Dear Mr. Gallo:

On behalf of the Arlington County Board and the residents of Arlington County, I am writing to provide comments regarding the impact of flight operations from Ronald Reagan National Airport (DCA) on our community, particularly the impacts that have been felt since the beginning of Next Generation Air Transportation System (NextGen) implementation in the Washington D.C. Metroplex beginning in November of 2014.

Simply, the implementation of NextGen in the Washington D.C. Metroplex airspace has had terrible negative impacts on the quality of life for residents on the ground in Virginia, the District of Columbia and Maryland. Arlington County has significant concerns with how the NextGen procedures were originally implemented, the scope of the current review, the proposed modifications currently under consideration, and mostly, the terrible negative effect it is having on the quality of life of our residents. Further, we believe that the additional modifications being proposed by the Federal Aviation Administration (FAA) would do very little to address them and could potentially exacerbate them for many residents of Arlington County and throughout the region.

According to the U.S. Environmental Protection Agency, noise pollution not only interferes with daily life, it has been shown to adversely affect the lives of millions of people. Studies have demonstrated direct links between noise and adverse health effects, including stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Further, the World Health Organization has found excessive and constant noise can cause cardiovascular and psychophysiological effects, reduce performance and provoke annoyance responses and changes in social behavior.

Perhaps most troubling is the fact that our region is not alone – both in experiencing the adverse consequences of NextGen implementation as well as the inability of the FAA and others to reasonably seek to fully understand these impacts through rigorous data analysis and working with communities to identify any and all steps to reduce or mitigate them. The same scenario that is currently playing out in our Metroplex is also happening across the country in San Jose, New York, San Diego, Chicago, Boston, Miami and Minneapolis, among others.

Given the unique constraints that exist and the complexity of operations in our region's airspace, when discussions began many years ago regarding airspace modernization, Arlington County and other localities were hopeful of the promise of the implementation of a modernized, satellite-based system and all the benefits it would provide. First, the increased safety and efficiency of the airspace that are the main driver of these changes are important achievements that should be the highest priority of any airspace modifications. Additionally, the projected annual benefits of the DC Metroplex changes - namely the reduction of 2.1 million gallons in fuel consumption, 18,000 metric tons of carbon savings, and the \$6.1 million in fuel savings – help advance important national environmental and sustainability goals. Further, the effectiveness and efficiency of our nation's airports have important benefits in strengthening our local, state, regional and national economies and to the general flying public, including Arlington residents.

We appreciate the opportunity to share with you our concerns with the process and substance of the proposed changes, outlined below.

1. Community Engagement Process

Arlington County requests that the FAA fully implement the recommendations of the NextGen Advisory Committee on Community Engagement and utilize this outreach process in the review of and any future adjustments to NextGen implementation and procedures in the D.C. Metroplex. Given the severe adverse impacts on local communities as a result of previous actions that had been approved on the assumption that there would be no significant impact, we do not think a Categorical Exclusion is the appropriate method for moving forward with the proposed changes.

While safety and efficiency of the airspace system are the primary considerations when considering Performance Based Navigation (PBN) implementation, community impacts of aviation noise should also be considered as a crucial part of the calculation that determines the overall benefits of the proposed changes. Experience has shown that successful PBN implementation efforts typically have had well-formed and established outreach long before the initiation of the PBN procedure development process. Doing so would ensure that ground impacts are appropriately understood and considered and appropriately incorporated into airspace changes that will change noise exposure, even if it does not reach the current FAA threshold of "measurable impacts."

We would like to commend the time, effort and resources that have been assigned by the FAA to the D.C. Metroplex. In particular, Ms. Elizabeth Ray and FAA Mission and Support Services team have been extremely generous with their time in making themselves available to our community and for their efforts working with the Metropolitan Washington Airports Authority (MWAA) DCA Community Noise Working Group (Working Group). While we were disappointed that a similar level of engagement did not occur prior to implementation, we are encouraged by recent efforts and we hope that they represent a commitment to move forward in a collaborative fashion.

2. Noise Data Analysis

Arlington County believes that the analysis of historical noise data has been insufficient and the modeling analysis of the proposed alternatives is flawed, thereby undermining confidence in any proposed solutions that have been developed. While we recognize that the preliminary analysis of the proposed changes has resulted in a finding that none of the alternative designs would cause reportable or significant changes in noise, we note that a similar finding was issued for previous actions that have been shown to have had a very substantial and unacceptable impact.

A preliminary analysis of the noise monitor readings themselves, as seen in the attached, demonstrates that average monthly and annual DNL aircraft readings at noise monitor locations to the north of DCA have substantially increased since 2014. It is our understanding that there have been no adjustments to those waypoints in recent years that would correspond to the increase in noise monitor readings. What is being experienced in our communities is not an increase in one neighborhood due to overflights with a corresponding decrease in noise in another neighborhood that is now not experiencing overflights due to changes in horizontal flight paths.

To the contrary, what the data demonstrates is a substantial increase in the overall noise being experienced on both sides of the Potomac River.

This has led Arlington County and our partner jurisdictions to reasonably ask the question – what is it exactly that is driving these changes and what options exist to address it? After many months of discussions, we still do not have an answer.

3. Alternatives for Noise Reduction & Mitigation

The nearly sole focus of the discussion at the Working Group and for the upcoming Community Outreach Sessions has been on the adjustment of waypoints along the departure and arrival corridors. The stated goal of this effort has been to “maximize flight time over the Potomac River and minimize flight time over residential areas.” We have seen from experience that both the size and meandering nature of the Potomac River make it impossible for most aircraft to remain exclusively over the River itself, particularly on northern departure. We know that there is no perfect solution and that community overflights in our region are a part of our reality moving forward. Therefore, we believe that for those individuals that find themselves under the flight path, particularly given the hours of operation that have been extended due to market conditions and the intensity and concentration of flights made possible by NextGen, that additional steps must be taken.

For example, we understand that in recent years other communities around the country and the world are taking a renewed look at a spreading out or a sharing of noise. While widely criticized several decades ago in our region during a trial phase, it is time to assess the effectiveness of these efforts at other airports and determine whether or not it could address some of the problems experienced in our region. Further, we note efforts in other regions to extend their noise reduction alternatives analysis to include not only *where* planes are flying, but *how* they are flying. To our knowledge, noise abatement operational procedures or restrictions have not been identified, discussed or analyzed.

Up until this time, Arlington County has not worked to analyze and develop technical alternatives for consideration by the FAA and others to address this issue. It does not seem reasonable to the County that local communities, who are not experts on the needs, constraints and opportunities with regards to aviation, should be tasked with solving this problem. Rather, we had hoped that through voicing our concerns and providing detailed information regarding the impacts on the ground, through the DCA Community Working Group or other efforts, that all stakeholders would work together to do so.

Conclusion

To date, we regret to say that we do not feel that the appropriate actions have been taken to acknowledge these impacts, to seek a deeper understanding of what is driving them, to fully identify and evaluate any and all options to reduce and mitigate the noise, and

importantly, a commitment to continue to monitor these procedures and their implementation on an ongoing and regular basis to address any issues that present themselves or to take advantages of opportunities that may present themselves in the future.

Arlington County firmly believes that improvements for both those on the ground and the flying public are possible and necessary. It is incumbent upon all of us - local governments, airport operators, the airlines and the FAA to work together to identify solutions that allow for the safe and efficient operations of our air traffic network while also minimizing the adverse impact on surrounding communities. It is our hope that this long overdue community engagement represents a forthright attempt by the FAA to understand the impacts on our community, what specifically is driving the increase in those impacts in recent years and a full and honest attempt to identify and evaluate all actions that can be taken to reduce and mitigate them.

If so, Arlington County looks forward to being your full partner in that effort.

Sincerely,



Libby Garvey
Chair, Arlington County Board

Attachment

Cc: Senator Mark Warner, United States Senate
Senator Tim Kaine, United States Senate
Governor Terry McAuliffe, Governor of Virginia
Representative Don Beyer, United States House of Representatives
Senator Janet Howell, Senate of Virginia
Senator Adam Ebbin, Senate of Virginia
Senator Barbara Favola, Senate of Virginia
Delegate Patrick Hope, Virginia House of Delegates
Delegate Alfonso Lopez, Virginia House of Delegates
Delegate Rip Sullivan, Virginia House of Delegates
Delegate Mark Levine, Virginia House of Delegates
Mr. Jack Potter, President and CEO, Metropolitan Washington Airports Authority