

July 28, 2020

The Honorable Peter F. Murphy, Jr.
Chairman, Fairfax County Planning Commission
12000 Government Center Parkway, Suite 552
Fairfax, VA 22035 plancom@fairfaxcounty.gov

RE: K. Hovnanian/Boulevards RZ/FDP 2019-SU-010, PCA 78-S-063-10, PCA 81-S-076

Dear Chairman Murphy,

The Metropolitan Washington Airports Authority (Airports Authority) is appreciative of the Fairfax County Planning Commission effort to keep the public record open as you further consider the Application RE: K. Hovnanian/Boulevards in the Westfields area of Fairfax County, VA. As you are aware, the Airports Authority comments submitted on July 14, 2020, basically making the point that, given the proximity of the proposed development to the location of existing Dulles flight tracks, overhead flights occurring nearby Boulevards at Westfield do occur 24 hours daily and given growth at Dulles over time, the hourly volume of this flight activity will undoubtedly increase in frequency. We also commented on the lingering issue regarding County adoption of the updated Dulles noise contour map from 2019.

On July 14, the Airports Authority respectfully requested the Planning Commission consider two suggestions regarding this Application: A.) **That the County seek to mitigate the inclusion of any new residential development** in this location; and, B.) **That the County fully adopt the updated noise contours for Washington Dulles International Airport.**

On the first point (A), while it is clear that if new Fairfax County residents move to this location, your new neighbors will likely hear airplane noise because there is airplane noise occurring at this location currently and other noise (traffic, etc.,) occurring. there are at least three things the Applicant can reasonably do and perhaps should be directed to do by the Planning Commission at this time in order to assist in mitigating interior residential levels of anticipated noise:

- 1.) The Applicant should provide insulation and interior noise mitigation (ex., insulated windows, walls, doors) for all new residential units proposed on the subject property within the existing (1993) or updated (2019) noise contour areas measuring 60-65 DNL, and consistent with the interior noise mitigation levels/approaches the Applicant has already agreed to proffer;
- 2.) That the Applicant provide the Airports Authority with the requisite avigation easement currently used by Fairfax County and Fairfax does ensure this easement runs with the land;
- 3.) That the Applicant provide clear notice to the new homeowner that they are moving into a noise-sensitive land area and the roadway traffic and 24-hour, daily aircraft operations of Dulles International Airport currently does exist and will continue to increase over time.

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With respect to the second point (B), the Airports Authority wishes to emphasize that eventual adoption of the updated 2019 Dulles noise contours by the Board of Supervisors (BOS), should it occur, is not at all in conflict with approval of this Application under the three aforementioned conditions, if the Planning Commission approves these three conditions and if Fairfax County BOS chooses to approve this Application contingent upon the three conditions. **In fact, if Fairfax County does ultimately adopt the updated Dulles contours, nearly all Westfield pending Applications listed in the enclosed graphic, including this one, might move forward more expeditiously and with less neighborly contentiousness,** provided the three conditions listed here are adopted for any new residential proposed within the 60-65 DNL contour areas.

Further, it would be in Fairfax County's best interest to adopt the updated contours going forward if the County is to realistically achieve a County-wide and consistent standard that can be used within the County Comprehensive Plan and that is based on current science and available data. Dulles' updated contours are solidly based on good and accurate science. After all, Fairfax County's own independent noise contour map update consultant and the related Fairfax County staff presentation firmly underscored that the Airports Authority's 2019 updated contours and ***noise analysis is "well-documented and consistent with Federal Aviation Administration (FAA) guidance."***

There has been some preliminary information recently shared with the County officials regarding the updated Dulles contours that suggests airport growth will not fully occur for 60-90 years. To conclude that Dulles airport will not grow to full buildout for such a long time is an assumption that should remain open to significant debate. The Airports Authority has not yet been invited by Fairfax County to review the updated Dulles noise contours with the current BOS; however, during last week's meeting where the County's independent aviation consultant presented along with County staff it was revealed and documented that while the updated contours assume a full-buildout of just over 1-million aircraft operation annually, **Dulles was already approaching nearly 600,000 airport operations per year as recently as 2006 (just 14 years ago),** before airline bankruptcies, a national recession and other, cyclic aviation-adverse market conditions took effect.

It is simply incorrect to now accept without further public discussion that the same level of Dulles aviation activity occurring in 2006 is not projected to be achieved again soon, nor that full airport capacity will not be achieved until the year 2080 or 2110. Just for example, I am enclosing for the Planning Commission's consideration a list of at least fourteen (14) immediate types of Aviation Industry Influences that would Positively Affect Dulles' Capacity to Grow far sooner than what last week's presentation might conclude. It should be noted that while none of these enclosed examples have yet been discussed with County staff nor with land use public policy decision-makers (because the Airports Authority hasn't yet been afforded an opportunity to present these examples to the current BOS), these examples of industry influences are worthy of public review and policy debate before simply dismissing the achievement of Dulles' domestic and international growth potential. ***The facts show that Dulles' annual operations have significantly and have recently grown before; Dulles will grow again; and the 40+ airlines operating at Dulles along with the Airports Authority and the Commonwealth of Virginia itself has invested significantly in Dulles' future to ensure this airport,*** which is the only international airport on the eastern seaboard of the United States with current capacity for building a new runway and for bringing significant new economic growth to this region, ***reaches its full potential as soon as practicable.***

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The Airports Authority fully appreciates how the Planning Commission has both the desire and a compelling interest in having complete information before you regarding how Dulles can and will grow and the effects of anticipated growth on properly locating airport-compatible development. We can later discuss the topic of how / when Dulles will grow and be assured, we would be pleased to provide the Commission with a Dulles International Airport update and growth briefing at a time and place when you determine such information can be productively received and considered by the Commission.

In the meantime, recognizing that you have a decision pending with this land use case in front of you, if the Commission or Fairfax County BOS is determined or compelled to move this Application forward at this time, the Airports Authority respectfully suggests that County approval of this Application could best occur if such approval is also contingent upon the Applicant fulfilling the three noise mitigation conditions listed earlier. Such an approval (with the three conditions) is at least reflective of what can be reasonably achieved in this case toward airport-compatible development.

Please feel free to contact me with any questions via (703) 417-8787 or by email at michael.cooper@mwaa.com Thank you.

Sincerely,



Michael J. Cooper
State and Local Government Affairs Manager
Metropolitan Washington Airports Authority

/Enclosures:

ATTACHMENT 1: Locations of Westfield's Land Unit J Rezoning Applications Pending or Approved

ATTACHMENT 2: Types of Aviation Industry Influences that Positively Affect Dulles' Capacity to Grow

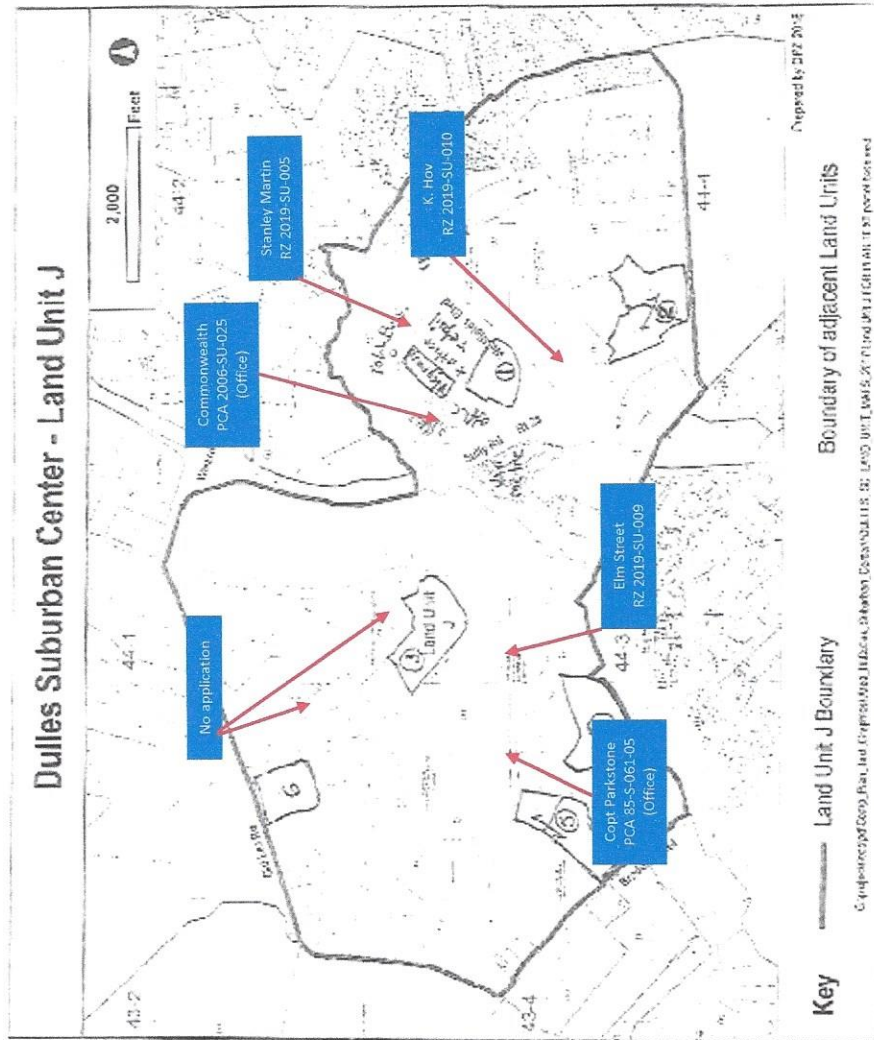


FIGURE 37

LAND UNIT J
 LOCATION AND COMPREHENSIVE PLAN MAP DESIGNATION

Types of Aviation Industry Influences that Positively Affect Dulles' Capacity to Grow
(Updated 7-28-2020)

Washington Dulles International Airport will not likely have a slow, straight-line growth pattern over the next six or seven decades. In fact, there are many reasons why any healthy Airport's growth rate can be anything but a straight line, including Dulles (IAD). These influences include (but are not limited to):

- Major signatory carrier unveiling new business model which focuses on IAD and could affect domestic and international networks (United Airlines is currently Dulles' hub-carrier)
- Latent demand from the COVID crisis
- New regulatory rules for social distancing on airplanes leads to fewer seats per aircraft or lower load factors. As passenger demand returns, increased operations are needed due to regulated load factor and/or seats per aircraft
- Unmanned Aviation Systems (UAS)/Drone operations (e.g., cargo service/delivery).
- Future operational limits at other regional airports leads to increase operations at IAD
- Additional and new air carrier service operations if connecting capacity shifts from other Air Carrier hub airports to IAD.
- Growth in General Aviation activity
- Cargo and E-commerce development at the Airport
- Federal regulation or deregulation – (Say, for instance the government starts subsidizing tickets)
- Fuel price collapse and/or evolution to electric flight may result in cheaper fares and reduced airline costs allowing for airlines to increase service.
- Supersonic return and/or space flights resulting in substantially quicker "in-flight" times may lead to increased passenger and aircraft operations demand
- Increased European travel with quicker recovery than other global regions
- Increased air travel up and down the East coast
- Urban air mobility

IN SUMMARY:

To suggest or to now conclude that Washington Dulles International Airport will not have / will not benefit from another spike in aviation growth in the near future (similar to growth that occurred as recently as 2000 or 2006), or that Dulles' future growth to full airport capacity will only occur linearly over the course of 60-90 years, is not a statement that could reasonably be regarded as fully complete or (perhaps) fully accurate.

Dulles has grown exponentially before and Dulles will again grow, but such growth will occur as before; Dulles will grow again in jumps and with "spikes" over time concurrent with aviation industry and market forces as they change or grow.