

**Hearing Testimony on PA 2020-CW-3CP, Airport Noise Policy
Planning Commission, 18 May 2022**

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On Behalf of Board, Holmes Run Valley Citizens Association

The proposed plan amendment is not acceptable in two dimensions. First, the guidance for noise mitigation is simply not adequate. Second, the proposal to allow residential development between the 60 and 65 DNL contours is based on obsolete 1993 noise contours and it should not be.

The amendment proposes that interior noise should be mitigated to 45 dBA, precisely the guidance that was introduced by the Westfields amendment in May 2019. However, the standard is pointless. It places no significant, actionable limit on interior noise. A day's-worth of aircraft noise at Dulles easily can include noise events exceeding 85 dBA, sometimes exceeding 90 dBA. Meeting 45 dBA inside homes would require at least 40 dBA building shell attenuation, a level that simply is not affordable at Dulles. It is 100 times the 20 dBA attenuation one can expect in standard home construction and it requires excluding 99.99% of the exterior noise. It's not affordable.

Since the Westfields amendment was adopted, the Planning Commission has approved four developments there. All four were asked to comply with the 45 dBA guidance. However, no applicant agreed to comply. Possibly the Commission was not aware that applicants had not met the interior noise standard. In each case, the staff report discussed the applicant's response to the guidance, but in no case did a staff report point out the fact that the applicant had failed to comply. In fact, in two cases, the staff report stated that the applicant had complied. But no one complied because 45 dBA is not affordable between contours at Dulles.

The policy plan provides longstanding guidance that interior noise should not exceed 45 DNL, a 24-hour average noise level very different from an instantaneous, here and now, fixed level of 45 dBA. Meeting the 45 DNL standard is straightforward between 60 and 65 DNL contours. The 20 dBA attenuation available from standard home construction is sufficient.

Consequently, developers would be able to meet the only feasible noise mitigation standard proposed, the 45 DNL guidance, simply by building homes using standard materials and practices. No additional sound insulation would be required. At the same time, the residents who filed the 76,000 noise complaints against Washington National airport in 2018 presumably lived in homes of more or less standard builder quality. If homes of standard quality in the National noise environment create 10s of thousands of noise complaints annually, it seems likely that standard homes in a built-out Dulles noise environment will do the same, and more, since flight

paths at National largely are over water. Hence one concludes that the amendment provides no effective protection against the likelihood that residential developments between the contours at Dulles would expose homes and residents to highly annoying aircraft noise to a degree similar to the trauma that plagues National airport today. Supervisor Storck has described the aircraft noise in his neighborhood as “terrifying.” No one wants that for residents at Dulles.

The county should develop effective standards for interior noise mitigation that adequately would protect the health and wellbeing of residents as well as protect the airport from the fate suffered by National. The standards should be based on documented experience and best practices at major hub airports that have successfully accommodated residential development between 60 and 65 DNL contours. The noise mitigation standards should be added to Sect 3103.2 of the Zoning Ordinance. Discretionary standards in the Policy Plan are not sufficient for protecting the welfare of residents and the airport.

For more than three years, a majority of the Board has gone to extremes in an effort to avoid adopting the 2019 contours. The objective of the contours is to assure that, as traffic grows and average noise levels increase, noise exceeding 65 DNL will not envelop existing residential communities. Consequently, both the 2019 and the 1993 contours are based on the airport operating at full capacity. This policy to discourage encroaching resident uses has served Dulles and surrounding communities well. The airport has been in service for 60 years and even with 300,000 annual operations it elicits relatively few noise complaints, approximately 1500 to 2000 per year compared to 76,000 at National. The Johnson Aviation report cites Dulles as “a rare example in the U.S. of well-planned airport-compatible land use success.”

In the 21 July 2020 meeting of the Land Use Policy Committee, staff’s consultant, Mr. Nick Johnson, of Johnson Aviation, recommended that the Board should adopt the 2019 contours as the more accurate representation of the current and future noise environment. Immediately following Johnson’s briefing, staff briefed the committee recommending that the contours should not be adopted. None of the three reasons given by staff for rejection were relevant to the question. Nonetheless, five of the nine supervisors present spoke of not adopting the contours and that’s where the question died. Shamefully and shamelessly, the committee has tabled the contours question for two years and counting. And incredibly, staff now proposes to use the fictitious 1993 contours as the basis for allowing residential development everywhere between 60 and 65 DNL. Clearly, any decision to allow residential between contours should be based on the current 2019 contours. No one has provided a cogent argument to the contrary.

The Board should hold a public hearing on the contours question and make their decision prior to further consideration of this plan amendment. Then everyone will understand the land area that would be affected by the allowing residential uses between contours.

Finally, several have recommended that Dulles should embrace the destiny of other major airports by allowing residential uses to congregate around the airport and then relying upon noise mitigation measures to “help ensure the economic viability of the airport.” (Staff Report, pg 30, 1st paragraph). Proponents include Supervisor Smith in her 28 Jul 2020 motion to authorize this amendment, the conclusions section of the staff report, and staff in the July 2020 LUPC meeting. It’s a reckless suggestion. Residential developments too close to Dulles will be damaged by aircraft noise and the damage will be permanent. There will be no means for turning the noise off and it will only increase as traffic grows at the airport.

The two developments approved by the Board that are located directly under approach paths to the two busiest runways demonstrate the Board’s propensity for careless decisions based on the premise homes should congregate around the airport.

The Johnson Aviation report describes the noise mitigation program at Minneapolis-Saint Paul International Airport as one example of the extensive and expensive noise mitigation efforts undertaken by major airports landlocked in residential communities. Since 1992, the airport has invested \$482 million in ongoing noise mitigation projects that extend out to the current 60 DNL contour and beyond. Hopefully, Dulles will not share this destiny.

Members of the Board vastly underestimate the consequences of communities exposed to highly annoying aircraft noise. They have made reckless proposals and consistently, if not always, they have dismissed the advice of experienced aviation professionals, including their consultant and the airport authority. **They should heed the advice of their consultant and they should develop a collaborative working relationship with MWAA and Loudon County to develop a “Dulles-wide solution” to land use management as recommended by the president of the Dulles Area Chamber of Commerce in the Westfields hearing.**

The plan amendment should not be adopted.

I would be happy to answer any question. Thank you.

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