

Attachment 1

History of COG's Aviation Policy Program and Recommendations for Updating and Enhancement

Purpose

The purpose of this document is to provide a historical framework and reference for noise mitigation policies developed since the Aviation Policy Committee (APC) was created in 1985¹.

Background on Formation of Committee

The COG Board of Directors formed APC in 1985 after the 1983-84 "Scatter Plan" demonstration². The area's elected officials recognized the need to identify a new mechanism to address continuing noise mitigation strategies. The "Scatter Plan" demonstrated that dispersal of aircraft noise was extremely controversial and the Board of Directors concluded that a regional approach, which examined meaningful noise abatement strategies for the Metropolitan Washington area, was needed.

The APC's mission is to provide a regional policy perspective on airport noise matters on behalf of the Washington area's local governments. The Committee has been delegated by the Board of Directors to speak on its behalf on noise policy matters, so long as the Committee operates within the framework of existing Board policies.

Composition

The Committee's composition consists of elected official voting members, in addition to non-voting industry and citizen representatives. This structure was envisioned as the best forum in which to consider noise abatement measures and to provide balanced advice to the COG Board of Directors. In turn, the Committee may offer its counsel to the Metropolitan Washington Airports Authority (MWAA), the Federal Aviation Administration (FAA), and other agencies developing noise mitigation policy that impacts the Washington area.

Committee Relationship with MWAA

COG and MWAA have worked cooperatively on airport and other related projects since the 1970's. In 1976, the FAA, then operator of National and Dulles International Airports, conducted the first flight path study at National and in 1977, COG held public hearings throughout the regional to discuss the study results. Subsequent cooperative studies were again conducted in 1983-84. COG also collaborated with MWAA in conducting the FAA Part 150 Study for Reagan National Airport in 1990 and 2002.

The MWAA and COG have had a long-standing relationship in cooperatively addressing community noise abatement strategies and developing noise abatement mitigation for close in communities that are impacted flights from National and Dulles Airports. This relationship is further highlighted by the MWAA recognition of the APC as the "preferred mechanism" for community input for addressing aviation noise issues.

Committee Relationship with Citizen Groups

APC was the first policy Committee to experiment with a structure that incorporated citizen representation into the policy committee forum. APC not only incorporated citizen groups, but also airport and trade associations. It was felt that the airport noise issue should have all impacted parties at the discussion table.

¹ The Committee was first called the National Airport Noise Abatement Committee. In 1986, the name was changed to the Committee on Noise Abatement at National and Dulles Airports (CONANDA) to reflect the inclusion of Dulles International Airport and the establishment of the Metropolitan Washington Airports Authority. In 2002, aviation was added to the name (CONAANDA) to signify a broader and more comprehensive mission. In 2006, the Committee's name was simplified to the Aviation Policy Committee (APC).

² On April 9, 1980, the COG Board of Directors requested by resolution that the FAA develop a study design for an alternative flight path demonstration test to the north of National Airport. This test plan was designed to distribute the aircraft and noise impacts as equitably as possible among all affected local jurisdictions – thus, the name Scatter Plan.

This model was re-affirmed in 2002 when the Committee's mission was further enhanced.

Policy Issues – An Overview

Since 1985, the APC has raised and discussed several noise mitigation planning issues. This overview discusses six topics: (1) nighttime noise, (2) 65 Ldn as threshold of noise annoyance, (3) permanent noise monitoring system, (4) emphasis on the role of land use policy in noise mitigation planning, (5) competition for Stage 3 aircraft in the region, (6) use of wide body aircraft at National Airport, and (7) slot and high density rules at National Airport.

Nighttime Noise

The Committee has identified several priorities, of which mitigation of nighttime noise at National Airport is the highest. Since 1981, COG has supported the policies promulgated by the Federal Aviation Administration, which, among other things, restricted the operation of large commercial aircraft during late night and early morning hours at National. In the early 1980's, the FAA discovered that its regulations had not achieved their avowed purpose when large commercial turbojets began operating between 10:00 p.m. and 7:00 a.m. In 1981, the FAA acted to implement a nighttime standard at National. This standard remains in effect today (72 dBA departure and 85 dBA arrival).

65 Ldn Contour

As required by FAA Part 150 Planning guidelines, the 65 Ldn threshold is generally used in defining airport noise impacts and for defining non-compatible residential land users near airports. While the APC understands the reasoning behind the selection of the 65 Ldn contour for these purposes, the Committee has noted that local household interview data collected in 1983-84, as part of the "Scatter Plan" test at National Airport, shows that a significant number of residents are "highly annoyed" by aircraft noise at levels well below 65 Ldn. It is the Committee's belief that the sole use of the 65 Ldn contour as the relevant "noise threshold" greatly understates the magnitude of the airport noise problem, and has gone on record with the FAA in this regard. If agreement can be reached by airport operator and the local jurisdiction, the FAA may consider a lower threshold.

Use of Permanent Noise Monitoring System

One of the first actions of the APC, after transfer of control of National and Dulles Airports from FAA to the MWAA, was the passage of a resolution requesting that the MWAA re-establish a program of noise monitoring and data reporting at Washington National and Washington Dulles Airports. The Authority continues to place substantial importance on the use of the permanent noise monitoring system to increase airline compliance with noise abatement procedures. A new 40 site monitoring system is currently being installed. The new system will integrate noise monitoring data with radar data thereby providing greater ability to monitor compliance with existing rules.

Land Use Compatibility

The Committee believes that *noise reduction* should be the focus of Part 150 noise abatement studies when the airport is *surrounded by predominantly developed land*, as is the case with Washington National Airport, and *land use* should be the emphasis when the airport is *surrounded by undeveloped land*. This position was reiterated many times in correspondence to the FAA Administrator regarding proposed changes to the slot and high-density rules.

Use of Wide Body Aircraft

The use of wide body aircraft at National Airport has long been an issue of concern. In 1981, the COG Board adopted a resolution (RII-81) which recommended that wide bodies not be used at National unless it can be demonstrated through appropriate tests that they can operate safely during marginal weather conditions when instrument landing techniques must be used. This concern was again raised in COG/APC comments on the Draft Environmental Assessment, Airport Traffic Control Tower Site Selection and Related Terminal Operations. This issue has always been referred to the FAA since it calls for a determination of safety.

Slot and High Density and Perimeter Rules

Perhaps the most significant issue since APC was established is the “slot” and “high-density” rule. The slot and high-density rules have been effective in “capping” noise at National Airport and for maintaining the existing level of noise relief in the Washington area. As indicated in numerous correspondences, the slot and high-density rules are considered part of a solemn agreement between federal, regional and local officials when the transfer of the airport from the FAA to the MWA occurred in 1987. FAA’s high-density rule limits the number of instrument Flight Rule (IFR) operations that may be scheduled per hour at certain high-density traffic airports, including National Airport. This is intended to address congestion and delays around these airports, rather than reduce noise pollution; however, it affects the degree of noise pollution by limiting the number of flights within a given time period. For National Airport, the high-density rule specifies that no more than 37 air carrier, 11 commuter, and 12 general aviation IFR operations may be scheduled per hour. In 1983, FAA granted a partial exemption that, in effect, allowed 2 additional commuter operations per hour at National. These limits on scheduled air carrier (37), commuter (13), and general aviation (12) operations combine to an overall restriction of 62 scheduled operations per hour at National Airport.

COG opposes any changes to the slot and high-density rules as applied to National Airport. This position has been stated on many occasions during previous legislative deliberations and administrative attempts to alter or modify the slot and high-density rules at National Airport. COG’s position on the slot and high-density rules includes “no tampering with slots.” Since the slot rule, as currently applied at National Airport, applies around the clock, COG’s policy on “no nighttime turbojet operations” should take precedence between the hours of 10:00 p.m. and 7:00 a.m. Therefore, COG’s position is that the application of the slot rule is subsidiary to the “no nighttime operations” policy.

Discussion

In February 2009, Chair Hynes initiated an effectiveness evaluation of the committee. This action was timely since COG staff was evaluating policy committee realignment options for effectiveness in program implementation and supporting the agency’s mission. Staff also anticipated an opportunity to review technical and committee alignments pending the forthcoming Climate Change report.

Results of APC Effectiveness Survey

To ensure that the role and purpose of the committee continues to be relevant to the overall mission of COG and the needs of its members, a brief email survey was conducted in February 2009. The results of the survey have guided the process, which included discussion with senior MWA staff as we evaluated the effectiveness of our aviation program.

The survey asked APC participants three basic questions designed to evaluate the effectiveness of the Committee in implementing programs.

1. *What Aviation Policy Committee meeting topics provide the most value to you?*
2. *What advice do you have to help improve COG's aviation policy work?*
3. *What changes would make it likely that you would regularly attend APC meetings?*

The survey results reveal that the committee could best serve its mission by refocusing its work program in several broad categories: aviation and advanced technology; helicopter community impacts; and aviation and economic development policy, with an emphasis on local and national legislative initiatives. The featured topic, along with a discussion forum at each meeting, will provide for a more robust dialogue and ensure that the Committee’s work is aligned with its mission.

In addition, respondents also noted that the committee should make better use of web page postings and updates; consider standard reports, written or spoken, on topics like noise and emissions levels; and share best practices on what other airports and communities are doing to mitigate noise and emissions. Rather than bi-

monthly meetings, it was suggested that the committee consider a quarterly schedule.

In the course of reviewing the committee's effectiveness, we also noted the committee's strengths. COG's APC has long been recognized as an effective and strong voice for protecting existing noise abatement and mitigation controls at Reagan Washington National Airport. This leadership has served the region's impacted communities quite remarkably dating back to the early 1980's during the experiment with scattering aircraft noise. A guiding principle, which continues to date, is that *no new communities should be exposed to aircraft noise because of noise mitigation attempts*. The *no noise shifting principle* continues to be the hallmark for sustained environmental improvements in the Metropolitan Washington region.

The APC has also been a successful voice for advocating no change in the slot and perimeter rules at Reagan National Washington Airport. The use of the slot and perimeter were originally perceived by the Federal Aviation Administration as tools to address congestion and delays around these airports. However, they also affect the degree of noise pollution by limiting the frequency of over flights within a given period. The APC has viewed both controls as necessary. Other successes in partnership with MWAA include development of a nighttime policy, and phase out of noisier aircraft. Throughout its history, the APC has been recognized by Metropolitan Washington Airports Authority and area Congressional liaisons as the most effective advocate for addressing aviation's impact on communities.

The MWAA and COG have had a long-standing relationship in cooperatively addressing community noise abatement strategies and developing mitigation strategies for close-in communities that are impacted by flights from Reagan Washington National and Dulles Airports. This relationship is further highlighted by the MWAA recognition of the APC as the "preferred mechanism" for community input for addressing aviation noise issues. Subsequent discussions with the MWAA suggest a strong desire for the APC to continue this role.

Anticipated Areas Requiring APC Action and Involvement

Community Noise Reporting -- It is anticipated that over the coming months, the APC will participate in the design and reporting of a community noise communication report. Early in the recent Part 150 Process, the MWAA committed to working with the APC to better design and report information that will ultimately be used in the outreach report to the community. There is also a call for presentation of reports to both MWAA and APC.

Advanced Navigational Procedures – The APC will continue to play a role in the implementation of advanced navigational procedures for arrivals and departures currently being developed by FAA as a result of Part 150 Recommendations and area Congressional interests.

Helicopter Noise Impacts – The need to address continued helicopter noise complaints and compliance to existing helicopter routes remains a community issue.³ The APC should continue its efforts with the military, law enforcement, medevac, and other helicopter operators, and the FAA to address these concerns.

Technical and Policy Review -- For the past 25 years, there have been various attempts to alter or modify the existing noise mitigation measures at Reagan Washington National. The APC submits that these attempts to weaken the slot and perimeter rules will continue in the form of amendments to the annual FAA reauthorization. Vigilance must continue to safeguard these controls.

Options Considered

Table 1 identifies advantages and disadvantages for each option considered for APC enhancement. The options are not mutually exclusive. In fact, the APC's preferred recommendation is a combination of options 1 and 3 which would retain the APC as currently constituted through the end of calendar year 2009 while

³ Helicopter impacts are not subject to MWAA purview.

using the forum format for selected topics of discussion.

Option 1. Retain the Aviation Policy Committee as currently constituted as a standing policy advisory committee to the COG Board of Directors through the end of calendar year 2009. Beginning in January, 2010, to the extent that aviation policy matters require action by COG, these would be advanced through COG staff to the Board acting as a “Committee of the Whole” on aviation policy matters. COG’s Executive Director would evaluate the effectiveness of the new approach in approximately one year and report to the Board on appropriate refinements or other modifications that may be necessary to insure an effective aviation policy program at COG. This should include possible integration of aviation policy into the recently established Climate, Energy and Environment Policy Committee.

Option 2. APC should remain as is with a revised and enhanced schedule. Under this option the committee would meet quarterly. Each meeting would be devoted to a selected topic, with representatives from the community, MWAA, other citizen and industry representatives playing an active role in designing and organizing each meeting. These meetings would be structured as forums. An enhanced web page would also be used. Under this option, additional meetings could be called at the discretion of the Chair.

Option 3. APC would be Replaced by a Stand Alone Forum Sponsored by COG – Under this option, a forum would meet twice a year, with one meeting designed as a regional community and citizen’s roundtable and a second designed as a best practices interchange with invited presentations from FAA and others.

Option 4. Aviation Policy Committee to be folded into Broader “Environmental” Policy Committee and become a technical committee. APC would become one of several subcommittees under the new Climate, Energy and Environment Policy Committee and would complement DEP’s overall goal to consolidate multi-media programs under one policy committee.

Option 5. Eliminate APC from COG Policy Committee Structure – Under this option, aviation policy issues would be handled directly by the Board without benefit of technical vetting process as was prior to 1985. Executive Director or his designee would determine after consultation with MWAA, COG Chair, whether an issue merits Board action. If so, the issue would be addressed as any other “non-committee housed” issue.

Committee Membership

Under Option 1, the existing members would continue through December 31, 2009. Forums would be chaired by Mary Hynes but potentially by other elected officials.

Forums would include participation from the existing membership which consists of elected officials, citizen representatives, industry, airport operators, and other federal, state and aviation representatives are the appropriate stakeholders. Greater emphasis needs to be placed on involving the economic and aviation industry representatives in the development of program activities.

Budget

It is recommended that the budget for FY 2010 be provided at ½ the funding level of FY 2009 or \$43,368. This should provide adequate ongoing support for this initiative during this initial transition.

Table 1
Options for the future of Aviation Policy Committee

Options	Pros	Cons
<p>1. Retain the APC as currently constituted as a standing policy advisory committee to the COG Board of Directors through the end of calendar year 2009.</p> <ul style="list-style-type: none"> • Beginning with 2010 host 3 to 4 aviation policy forums ; • COG Board operates as “Committee of the Whole” on policy matters. • Upgrade website. 	<ul style="list-style-type: none"> • Reduces budget allocation by 50% • Provides 1 yr. evaluation of new process while maintaining structure to address issues • Provides venue for citizen participation 	<ul style="list-style-type: none"> • Still requires significant support from membership • May be insufficient business to justify Committee • COG Board may be required to address substantially aviation policy business
<p>2. APC Remains “As Is” with Reduced Schedule</p> <ul style="list-style-type: none"> • <i>APC remains COG Committee with same membership</i> • <i>Would meet 3 to 4 times per year</i> 	<ul style="list-style-type: none"> • Reduces budget allocation by 50% • Committee structure remains in place • Provides venue for citizen participation 	<ul style="list-style-type: none"> • Still requires significant support from membership • May be insufficient business to justify Committee
<p>3. APC would be Replaced by a Stand Alone Forum Sponsored by COG</p> <ul style="list-style-type: none"> • Forum outcomes would be periodically reported to COG Board • Forum would serve as a collective body of aviation industry, airport operators, and community representatives. • Forum would serve as a liaison for officials on aviation policy, and general aviation issues. • Forum would meet twice a year, with one meeting designed as a regional community and citizen’s roundtable and a second designed as a best practices interchange with invited presentations from FAA and others. 	<ul style="list-style-type: none"> • Reduces budget allocation by 1/4 to 1/3 of current budget allocation • Maintains venue for citizen, industry, airport operator, and industry on aviation issues 	<ul style="list-style-type: none"> • May not be able to provide timely policy responses to congressional and administrative actions negatively impacting airports • Would redefine long-standing COG relationship with MWAA, FAA, and Citizens on aviation environmental noise issues • No perceived community input forum for citizens
<p>4. Aviation Policy Committee to be folded into Broader “Environmental” Policy Committee</p> <ul style="list-style-type: none"> • APC would become technical committee • APC would become one of several subcommittees under the new “Climate, Energy and Environment Policy Committee and would complement DEP’s overall goal to consolidate multi-media programs under one policy committee. 	<ul style="list-style-type: none"> • Reduces budget allocation by 1/4 • Retains aviation policy capacity under the COG Board structure • Retain basic mission and function of existing APC. 	<ul style="list-style-type: none"> • Dilutes aviation policy importance at COG and Regional Community • May loss congressional and other executive effectiveness • Requires Board Action
<p>5. Eliminate APC from COG Policy Committee Structure</p> <ul style="list-style-type: none"> • Aviation Policy Handled by the COG Board • Executive Director or his designee would determine after consultation with MWAA, COG Chair, whether an issue merits Board Action. If so, the issue would be addressed as any other “non-committee housed” issue. 	<ul style="list-style-type: none"> • May reduce budget allocation by 50% • APC would be Eliminated From COG Committee Structure and Aviation/Airport Issues Handled by the Executive Office • Foster new relationship with MWAA 	<ul style="list-style-type: none"> • Diminish focus within COG on aviation issues • May not be in a position to respond to aviation issues in a timely manner • Eliminates or reduces significantly the opportunity for community input • <i>No perceived community input forum for citizens.</i> • Would eliminate and redefine long-standing relationship with MWAA, FAA and citizens

Table 2
Potential Forum Topics

<p>1. Aviation and Economic Impacts in the Metropolitan Washington Area: This forum will highlight aviation impacts on local governments in the region. Related activities may include, through cooperation and coordination with the Aviation Technical Subcommittee, review of growth trends, aviation passenger statistics, and ground access issues. COG staff will work with State Aviation, Economic Development, and MWAA to develop this forum.</p>
<p>2. Helicopter and Community Forum: This forum will focus on aviation community/neighborhood impacts and noise monitoring and reporting. A featured highlight of this forum will be helicopter route compliance. All users will be invited to participate. Best practices with reporting and responding to community inquires will also be featured. The APC Citizens representatives, working with COG staff, will take the lead in organizing and developing the community forum.</p>
<p>3. Aviation Policy Forum: This forum is envisioned as an opportunity for both airport representative and elected officials to identify legislative priorities for sustainable airports. Policy discussions may include environmental, energy, and green airports.</p>
<p>4. Technical Forum: This forum will feature new aviation technology. Both the FAA, NASA and airline industry representatives will be requested to participate. Reducing aviation noise is important to the efficient operation and expansion of the National Airspace System because community opposition to aviation noise is a major obstacle to airport and runway development. Such development is needed to help address congestion and meet the nation's rapidly growing demand for air travel. The Federal Aviation Administration (FAA) and the National Aeronautics and Space Administration (NASA) have the primary federal responsibility for research and development (R&D) on aviation noise. FAA focuses on the impacts of aviation noise on communities, while NASA focuses on noise at its source--aircraft engines and airframes.</p>