

# TOWN OF HERNDON



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Michael L. O'Reilly  
Mayor

March 7, 2005

*Via Facsimile & US Mail*

Mr. Brad Mehaffy  
Federal Aviation Administration  
Washington Airports District Office  
23723 Air Freight Lane, Suite 210  
Dulles, Virginia 20166

**Re. Washington Dulles International Airport  
New Runways Environmental Impact Statement**

Dear Mr. Mehaffy:

The Town of Herndon appreciates the opportunity to comment on the New Runways Draft Environmental Impact Statement (EIS) for the Washington Dulles International Airport. While we support Dulles Airport as a critical facility and a major economic engine in the region, we do believe that appropriate measures should be taken to mitigate the environmental impacts of the large expansion in flight operations that is planned. These measures are warranted if Dulles Airport is to absorb a large majority of the increase in aviation in the Baltimore and Washington areas, as projected.

Our concerns include noise and air pollution impacts on the Town of Herndon and on other communities surrounding the airport. We advocate that full consideration be given to the following:

1. Develop and implement a noise mitigation plan. Our understanding is that such a mitigation or compatibility plan has been in effect for Reagan National Airport for a number of years. We believe that noise abatement measures need to be deployed to protect residential areas that are subjected to regular, high levels of aviation noise, even though these areas may be below the 65 DNL contour. We believe that this program should address flight patterns and also the on-ground jet engine maintenance tests. We note that the EIS shows a new departure pattern not shown in previous analyses, extending from the North-South Runways and looping to ascend directly over the center of the Town of Herndon. The following specific measures should be included in the noise mitigation plan:
  - Prepare a FAR Part 150 Noise Compatibility Program for Dulles Airport, and include public review and input in the process;

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- Install state-of-the-art noise monitoring equipment in the Dulles environs to replace aging, outmoded or defective equipment;
  - Update the airport flight tracking system to keep planes to appropriate flight path and altitude profiles;
  - Phase-out use of hushkitted Stage 2 aircraft and enforce the requirement that airplanes meet the FAR Part 91 "General Operating and Flight Rules" specifying that after December 31, 1999, no person may operate a Stage 2 aircraft over 75,000 lbs. in the contiguous United States;
  - Regularly publish a chart indicating those airlines that use hushkitted Stage 3 aircraft, operating hours, and flight path usage;
  - Encourage the FAA to adopt Stage 4 standards, which would greatly reduce airplane noise up to 10 dBA;
  - Create a goal of a quieter fleet mix for evening hours (8:00 p.m. to 10:00 p.m.);
  - Establish a system to report airline compliance with noise abatement measures; Improve monitoring of noise complaints and monitoring compliance; and
  - Consider enlarging the airspace and raising the altitude profiles of Dulles flights in order to accommodate projected regional growth in aircraft operations, most of which will occur at Dulles.
2. Develop state-of-the-art air quality mitigation. Air quality, the severe non-attainment status and transportation funding related to that status are major concerns for Herndon as well as the other jurisdictions in the area. Metropolitan Washington Council of Governments information shows that at times the environs of Dulles Airport have some of the worst air quality readings in the region. Although new runways should help minimize on-ground jet idling due to departure delays, we believe that additional mitigation should be implemented, including the following:
- Implement best available technologies and procedures to reduce aircraft emission;
  - Implement advanced fuel handling and refueling operations to reduce emissions; and

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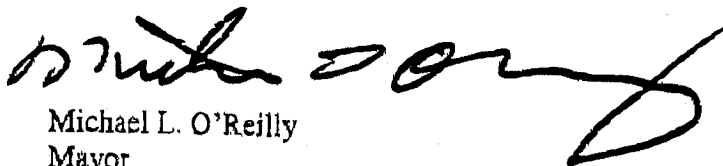
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- Implement conversion to available clean fuel technology for ground transportation and for aircraft support vehicles. For example, airport shuttle buses and even private shuttle fleets serving Los Angeles and other major airports use clean fuels such as compressed natural gas.

Again, we appreciate the opportunity for comment and request that you give consideration to these important quality of life issues.

Sincerely,



Michael L. O'Reilly  
Mayor

c. Members of the Herndon Town Council

The Honorable Frank R. Wolf, 10th District, Virginia, U.S. House of Representatives

The Honorable Janet D. Howell, 32nd District, Senate of Virginia

The Honorable Thomas Davis Rust, 86th District, Virginia House of Delegates

The Honorable Gerald E. Connolly, Chairman, Fairfax County Board of Supervisors

The Honorable Joan M. DuBois, Dranesville District Representative, Fairfax County Board of Supervisors

Stephen F. Owen, Town Manager

Henry G. Bibber, Director of Community Development

George L. Nichols, Principal Environmental Engineer, Washington Metropolitan Council of Governments

John R. Bell, Planner II, Fairfax County Department of Planning and Zoning