



AURORA HIGHLANDS CIVIC ASSOCIATION

August 28, 2023

Ms. Colleen Regotti
Metropolitan Washington Airports Authority Planning Department
1 Aviation Circle, Ronald Reagan Washington National Airport
Washington, DC 20001-6000
Via environmental.comments@mwaa.com

RE: DCA Draft Environmental Assessment (EA) for Roadway Network Improvements and Associated Development

Dear Ms. Regotti:

Thank you for the opportunity to comment on the **Draft Environmental Assessment (EA) for Roadway Network Improvements and Associated Development**. Washington National Airport continues to have a profound impact on the livability of the 22202 neighborhoods of Arlington, which are immediately adjacent to the airport. As the President of the Aurora Highlands Civic Association, I would like to flag the traffic, noise, and air quality impacts that will result from the proposed changes to the airport infrastructure. We are also concerned that the EA has not sufficiently justified the proposed road changes, new parking garages, and office space (though we concur that the current road network leaves a lot to be desired). There are other alternatives that would meet the needs of the airport users going forward and we urge you to pause the project so that you can appropriately consider additional alternatives.

Proposed Alternatives Evaluated Were Too Limited

The three alternatives appear to be variations of the same proposal, locked in by the requirement to put everything on site. Yet the EA does not fully consider the future benefits of CC2DCA, the rich and growing transportation options in the area, cite a much-needed Transportation Demand Management (TDM) plan, or include the MWAA's own 2020 Sustainability guidelines. Arlington has been pressing for alternatives to cars and DCA is uniquely located to maximize use of public transit, pedestrian/bicycle routes such as CC2DCA and a robust bicycle network. The plan should look carefully at how to knit DCA seamlessly (and safely) into those existing transportation networks. Rather than building more parking, why not work to improve and support Metro and other transit and commuter services (frequency, hours, convenience, accessibility, and costs)? We look for a real Transportation Demand Management plan for employees and travelers that plans for how to expand and incorporate all of the rich alternative transportation modes to get people to and from the airport without costly and environmentally damaging construction.

Do Recent Trends Justify the Need for More Parking?

One of the project justifications for a major DCA airport road redesign and building a huge amount of new, above ground parking is increasing passenger volumes, as shown in Table 1-1: Historic and forecast enplaned passengers and aircraft operations (p. 29), which shows an almost doubling of passenger numbers between 2008 and 2035, with a much smaller increase in aircraft operations. Yet at MWAA's Project Journey briefing to the Crystal City Civic Association on February 21, 2018, speakers partially justified adding the new terminal because DCA was increasingly serving as a transfer hub. They cited that 45% of American Airlines connect between gates, causing delays and passenger inconvenience, which could be remediated with the new proposed terminal.

Transferring passengers do not need new airport parking, rental cars, or new airport roads - they do not leave the airport! If all passengers are included in Table 1-1, whether they use the airport transportation facilities or not, the numbers are a misleading guide to future road and parking needs. The EA needs to tease out the passenger numbers and explicitly cite the passenger numbers using DCA as their point of origin or final destination, as these are the only passengers that might need to drive on the roads, use parking, rental cars, or ride share services. The EA also needs to consider the environmental impacts that these additional roadways and traffic will have on the adjacent neighborhoods and their air quality.

New Office Space on DCA vs. Alternatives; Protection of Abington Research Station

Does MWAA really need to have its office space on-site at DCA? Is there a problem with the existing condition? The current arrangement in Crystal City can be made permanent and the potential cost increases discussed in the EA mitigated. Crystal City, and Arlington in general, currently has a glut of commercial office space that is unlikely to go away any time soon. Instead of the expense of building new office space on DCA, MWAA could purchase an existing building in nearby Crystal City. MWAA could even purchase a larger building than needed to have a buffer for future growth and a rental revenue stream in the interim. This option would also free up limited land on DCA for future aviation-related purposes as well as reducing the parking that needs to be addressed through the proposed construction effort. In another real estate related issue, MWAA should look for ways to preserve and repurpose the historic buildings of the Abington Research Station (Hill Complex) that are NRHP-eligible. There are important sites on the DCA site and MWAA should take stewardship of the land seriously.

An Effective TDM Plan Should Support Active Transportation

Biking and walking to DCA is an important transportation option that supports individual, community, and environmental health. DCA needs to support these active transportation options through developing better facilities on site, collaborating on building a better, fully connected bike-ped network in the DCA area, providing financial incentives to employees for biking to work, and better wayfinding, promotional, and educational resources for using active transportation for employees and travelers. All bike-ped facilities need to be safe, convenient, comfortable, connected, cost-effective, kept in good repair, and fully accessible for all users. The planning for DCA's future also needs to be fully compatible with the planning for CC2DCA so that it becomes a direct, convenient, and safe connection. More work needs to be done in this area, to include a grade-separated crossing on the Mount Vernon Trail over the vehicular on-

ramp from DCA onto northbound George Washington Memorial Parkway, an improved connection from the Mount Vernon Trail to DCA, as well as real bike-ped paths on Route 233.

Ongoing Noise Due to Aircraft Operations and Additional Construction Noise

We are already impacted by the loud noise of the airport itself, as exacerbated by go-arounds that fly directly over our neighborhood and are very concerned about the impact of noise due to additional construction. This is an important quality of life issue for a neighborhood that is experiencing serious construction fatigue. Therefore, we will ask Arlington County not to grant any exemptions to current noise limits for construction, especially at night.

Improve Public Outreach for Future Public Engagements

Posting a notice in the Washington Post and on the static MWAA website is insufficient for outreach to the locally impacted community and the bike-ped community. As a result, we were unaware of the August meeting and our neighbors were not able to participate. Please work with the County's Engage Arlington staff, local online news outlets (such as ARLNow.com), and the impacted Arlington civic associations to promote plans and encourage real public engagement. By working with its neighbors, MWAA can develop the airport of the future that meets everyone's climate and sustainability goals and becomes a model for moving away from car-centric design.

Sincerely,



Cory Jacobson Giacobbe
President, Aurora Highlands Civic Association

CC: Arlington County Board
Arlington County Manager
Senator Mark Warner
Senator Tim Kaine
Representative Don Beyer
Arlington Ridge Civic Association
Crystal City Civic Association