

D.C. METROPLEX BWI COMMUNITY ROUNDTABLE
c/o Maryland Department of Transportation Aviation Administration
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February 9, 2021

**SUBJECT: 2020 Annual Report of the D.C. Metroplex BWI Community
Roundtable**

INTRODUCTION

The D.C. Metroplex BWI Community Roundtable (“BWI Roundtable”) hereby submits its fourth annual report. This report was approved unanimously by the Roundtable on February 9, 2021. This report is required by the BWI Roundtable charter with the Maryland Department of Transportation Aviation Administration (MDOT MAA or MAA). This report includes the following topics: History, 2020 Roundtable Meeting Dates, Roundtable Work with the Federal Aviation Administration (FAA) and MAA, Other Roundtable Actions, Identified and Unresolved Problems and Risks, and Conclusion.

HISTORY

The BWI Roundtable was formed at the request of the FAA and is hosted by the MAA. Through its meetings, the BWI Roundtable has worked with the FAA utilizing technical and other support provided by the MAA and, recently, by Southwest Airlines as well, to seek solutions to harmful effects brought about by the implementation of the DC Metroplex project implemented under the NextGen program.

During its first meeting, held on March 21, 2017, the BWI Roundtable unanimously adopted the following resolution as a priority:

The DC Metroplex BWI Community Roundtable requests and recommends that the FAA immediately revert to flight paths and procedures that were in place prior to the implementation of NextGen and the DC Metroplex plan. Such reversions will provide urgent relief to residents adversely affected by these new flight paths and procedures while a more deliberate and public-facing process to develop and implement NextGen and the DC Metroplex plan is undertaken.

The BWI Roundtable has acted consistently with this request to the FAA and acknowledges that successful reversion and relief may be achieved using current or new technology.

The BWI Roundtable works to provide the FAA, MAA and the Maryland General Assembly a concise picture of the significant negative impacts that the NextGen/D.C. Metroplex program has inflicted upon unsuspecting Maryland residents living under the resultant flight paths and the likelihood/reality that additional concentrated flight paths will continue to result from the FAA's current rules of management of the airspace and the planned growth of Baltimore/Washington Thurgood Marshall Airport ("BWI Marshall").

Each meeting of the BWI Roundtable has involved technical discussions and presentations, as well as a public comment section. Individual homeowners and residents provide poignant and arresting descriptions of the damage being done to their lives, health, and properties in Maryland. Significantly, their belief in government has changed as a result of how the federal and state governments allowed NextGen to be implemented without any warning of, or protection from, the far-reaching and life-altering nature of these changes. Residents continue to testify that they have been ambushed, abused and abandoned by the very entities their tax dollars fund. Exculpatory public statements made by the both the MAA and FAA maintain that each agency believes it is operating in the name of safety and economic interests, and within the constraints of the law.

2020 ROUNDTABLE MEETING DATES

The BWI Roundtable met as a working body on the following dates in 2020: January 21, November 17 and December 15. The number of meetings decreased this year due to the global pandemic which resulted in government closures and prohibitions on gatherings. Public meetings resumed virtually in November with the election of new leadership, previous leadership having served an extended term of one year and seven months.

The full monthly meeting agendas and minutes of the meetings are on the MAA's website: www.maacommunityrelations.com.

ROUNDTABLE WORK WITH FAA AND MAA

At the beginning of 2020, the FAA Performance Based Navigation 7100.41A (PBN)* Working Group was considering the BWI Roundtable's proposal for changes to arrival and approach procedures at BWI Marshall. The proposed changes were developed by the MDOT MAA, the MDOT MAA's contractor Harris, Miller, Miller and Hanson, Inc. (HMMH) and industry representatives from Southwest Airlines (SWA), and were developed in response to the FAA's proposed procedure changes presented to the BWI Roundtable on April 24, 2018.

*The Performance Based Navigation 7100.41A process is the process by which the FAA makes procedural and other changes to the airspace.

The pandemic resulted in overall delays in the FAA's PBN process at BWI Marshall. The FAA commenced with the PBN process and allowed members of the BWI Roundtable's Technical Committee and BWI Roundtable leadership to attend one PBN Working Group planning meeting along with the MAA and other industry stakeholders on November 10, 2020. The meeting included the following updates:

- 1) The FAA is on track for implementation of new flight paths for BWI Marshall in accordance with a timeline to be established at the completion of the PBN working group.
- 2) There was no feedback from the FAA to suggest that the new flight paths resulting from the PBN process will be significantly different than what the BWI Roundtable proposed. Any proposal from the FAA that differs from the BWI Roundtable's proposal will be returned to the BWI Roundtable for review and approval.
- 3) Beginning in February, 2021, the PBN Working Group will do a full design and analysis which will include the BWI Roundtable's proposal. The full design will then go through the environmental review process. After that, there will be test flights, training, and publication of procedures. The FAA expects the process to be complete by the summer of 2022, while acknowledging there are many factors which could result in delays.
- 4) The FAA requires that the BWI Roundtable's proposal be treated as a single package for environmental review, which limits the FAA's ability to implement some parts of the proposal more quickly than others. The changes may be broken

into smaller groups for training and testing purposes, which may result in differing final publication dates.

OTHER ROUNDTABLE ACTIONS

2020 AIRPORT NOISE ZONE (ANZ)

The MDOT MAA develops and certifies the BWI ANZ pursuant to the Maryland Environmental Noise Act of 1974. The ANZ for BWI Marshall is required to be updated every five years (see Transportation Article, §§5-805, 5-806, and 5-819, Annotated Code of Maryland). In 2019, the MAA began the ANZ re-certification process which had previously been completed in 2014. The BWI Roundtable chairperson and vice chairperson were included in the process as members of the Stakeholder Advisory Committee (SAC).

U.S. GOVERNMENT ACCOUNTABILITY OFFICE (GAO)

In June, 2020, BWI Roundtable leadership and members of the technical committee were interviewed by the GAO about community noise impacts resulting from the FAA's implementation of performance-based navigation procedures in response to a request from 34 members of Congress.

ADMINISTRATIVE ACTIONS/LITIGATION

All state and local legal actions to date have not been successful. It is possible that all judicial avenues have been exhausted.

MARYLAND GENERAL ASSEMBLY

The BWI Roundtable adopted a resolution in support of SB0184/HB0310 University of Maryland, Baltimore – Study on the Health Effects of Air Traffic Noise. The legislation received bipartisan support and passed both chambers but was vetoed by Governor Hogan due to pandemic-induced fiscal concerns. In response to continued bipartisan support, Governor Hogan provided funding for the study which will commence in 2021.

BWI Noise Complaints:

The global pandemic has resulted in a decrease in total noise complaints filed in 2020. However, a more comprehensive analysis of the effects of pandemic-induced changes to flight operations at BWI is not possible with the technical analysis provided by the MAA at the time of this report. Some communities may have experienced significant changes in noise pollution, while others report little change in their exposure to noise pollution.

IDENTIFIED AND UNRESOLVED PROBLEMS AND RISKS

- Any changes implemented by the FAA during the current PBN process at BWI Marshall are meaningful and necessary; however, the FAA has no plan to address the remaining significant and crippling noise issues being experienced, including:
 - Airplanes flying in low and highly concentrated arrival routes over Anne Arundel County causing major noise, health and monetary issues for its residents. These altitudes are significantly lower than arrival altitudes flown pre-NextGen.
 - Remaining NextGen-generated issues with departures need to be resolved.
- The FAA's process for designing and managing flight patterns in the national airspace fails to consider the presence of, or effects on, densely populated areas, historic areas, local established noise abatement areas, etc.
- Congressional and state leadership may consider the presence and growth of the airport as an unalloyed economic boon in error. A growing body of international scientific research has linked aviation noise to billions of dollars in healthcare costs over relatively short periods of time, measurable increases in childhood illness and learning deficits, loss of productivity and depreciation of real estate among other fiscal impacts.
- The composition of visibly settling aviation exhaust particulate and invisible exhaust pollution created by the low and concentrated paths of commercial aircraft is unknown. The components and effects of the physical pollution need to be determined.
- The ten-year planned expansion of BWI Marshall and subsequent increases in flight operations will worsen the noise crisis in Maryland so long as there is no solution to NextGen nor a demonstrated ability of the MAA or Maryland leadership to protect Maryland residents from the FAA's unchecked administration of our airspace.
- The BWI Roundtable has become the de facto locus for airport noise pollution-related concerns and possible solutions in the region. However, the BWI

Roundtable is composed of citizen volunteers who have spent considerable amounts of personal time becoming proficient in aviation noise and airport operational issues. This structure is a medium-term risk because volunteer committees find it difficult to maintain hard-gained institutional knowledge, especially in such a highly technical undertaking such as this. The Roundtable may not be able to continue at a high level of activity for the amount of time required for long-term governmental and technical processes to achieve results in the absence of dedicated funding, as well as administrative and legal support.

CONCLUSION

As a part of the current PBN process at BWI Marshall, the FAA has been presented with a proposal for changes supported by the BWI Roundtable and has itself proposed a potential solution to a small portion of the problems resulting from NextGen's implementation at BWI Marshall. The proposed changes developed by the MAA and supported by the BWI Roundtable were developed under serious time constraints in order to achieve some change before the FAA's PBN process was completed at BWI Marshall for the foreseeable future.

The BWI Roundtable's proposal is the first of its kind (technically validated by the MAA and airline industry) to be submitted to the PBN process. This establishes an important and positive precedent and has been made possible by the following critical factors/components:

1. Autonomy of the BWI Roundtable to report directly to state legislators and local governments who appointed its voting body.
2. Technical and administrative support of our airport authority, the Maryland Aviation Administration.
 - Technical support included the work of HMMH, a contractor to the MAA, with the technical expertise to design airspace to the FAA's stringent criteria.
3. Support of Southwest Airlines including technical support to validate proposed airspace designs against aircraft capability in their company simulators.

The PBN Working Group process is extensive and occurs at irregular intervals at BWI Marshall; however, the FAA maintains another process for small procedural changes between PBN Working Groups called the IFP Gateway intake. According to the FAA, technically proficient, industry approved, airport and BWI Roundtable endorsed changes would be considered in this process.

Potential and significant avenues to mitigate post-NextGen noise pollution at BWI Marshall include local restrictions on airport operating hours, aircraft type and noise category and planned airport growth.