



September 2, 2022

Dear Chairman Hayes and the Loudoun County Planning Commissioners,

The Loudoun Aircraft Noise Mitigation Committee (LANMC) was formed after several of our members spoke at your June 28th hearing and realized the cross-community interest in the AIOD Update. Since that hearing, we have spent our summer immersed in research and meetings with subject-matter experts in aviation, development, and government fields. Our own LANMC steering committee draws from engineering, architecture, aviation, and communications experience, as well. We also represent the [more than 1,100 Loudoun County residents who have to date signed our petition about excessive aircraft noise](#).

It is from this perspective that we are writing you all in advance of your work session on September 8th regarding the AIOD Update. We understand from Josh Peters that he will recommend that the Commission adopt the AIOD Update as presented during the June 28th meeting. However, we believe there are significant unaddressed problems that will negatively impact the communities within the AIOD's new boundaries. The following are the recommendations and concerns that we see as necessary for you to discuss at the work session, which we will be respectfully attending:

- 1) The Dulles AIOD has substantial opposition and needs additional time to resolve those problems.
- 2) We strongly oppose moving any existing residential homes into an LDN-65+ zone for many reasons, but chief among them is that additional clarification is needed about the impact of designating these new homes as a non-conforming use in the LDN-65+ zone. These homeowners have unanswered questions about the impact on home insurance rates, mortgage refinancing opportunities, and casualty losses and do not see that the County has addressed these concerns in the AIOD Update plan.
- 3) For existing homes that are being moved from the old one-mile buffer area into the proposed revised LDN 60-65 AIOD area, the question of how acoustical treatment will be performed, when it will be performed, and who would pay for it, has yet to be determined and is not addressed in the revised AIOD zoning ordinance text.
- 4) MWAA only has an existing aviation easement over homes in the current LDN 60-65 contour. Therefore, the question of how MWAA obtains an aviation easement from the homeowners whose existing homes are being moved into this zone needs to be addressed.
- 5) Because MWAA did not follow the FAA's protocols for developing Noise Exposure Maps, Loudoun County residents are unable to seek federal funds for noise insulation, unlike residents living near BWI and other national airports. Thus, if the County chooses to

accept MWAA's noise map, it must provide relief to homeowners that could have been pursued at the federal level. Though we strongly oppose the LDN-65+ rezoning altogether, should it go forward, we believe that *at minimum* the County should offer a 50 percent reduction in property tax assessments for as long as a home is in that noise contour and a fair-market reimbursement for acoustical treatments required of future residential builders in LDN 60-65 and LDN 65+ for those homes now being moved into those noise contours.

- 6) We support clear disclosures at the contract signing stage, subject to the three-day rescission period. Such disclosures need to be clear about what the noise contours mean and state what tax relief or noise remediation compensation the home or homeowners have or will receive for this zoning amendment. This disclosure statement needs to be signed by the buyer and included as an addendum to the real estate contract.

LANMC is not opposed to the existence or growth of Dulles International Airport. However, we do not understand why the County zoned for the 1993 sound contour map with light industrial and parkland areas near the loudest lobes of the sound contour map, but today is accepting a pattern of flights that largely abandon those contours so that planes fly at extremely low altitudes over residential homes. Nor do we understand why the County approved residential construction in an area it apparently knew would become restricted LDN-65+ zoning in just a few short years, even before the community was fully constructed.

It is now time for the Metropolitan Washington Airports Authority to develop a Noise Compatibility Program or Good Neighbor policy for Dulles, similar to what it has done for Ronald Reagan Washington National Airport. We urge Loudoun County to follow the examples of Montgomery and Arlington Counties in pursuing such efforts with MWAA so that Dulles can co-exist with the residents of Loudoun County who are affected by excessive aircraft noise. We believe that by working together, we will ensure that Dulles can grow in the future and residents living in its flight path will be safer, healthier, and enjoy a higher quality of life.

Thank you for your consideration,

The LANMC Steering Committee