

DC METROPLEX BWI COMMUNITY ROUNDTABLE

c/o Maryland Aviation Administration

P.O. Box 8766

BWI Airport, MD 21240-0766

June 4, 2018

Ms. Robin M. Bowie
Director, Office of Environmental Services
Maryland Department of Transportation
Maryland Aviation Administration
P.O. Box 8766
BWI Airport, MD 21240

RE. Faulty MAA Draft Environmental Assessment for the Proposed Expansion of BWI

Dear Ms. Bowie:

The DC Metroplex BWI Community Roundtable (RT) was formed by the Maryland Aviation Administration (MAA) at the insistence of the Federal Aviation Administration (FAA) to act as the vehicle for addressing the harmful noise issues associated with the NextGen/DC Metroplex project. The RT has gained valuable knowledge from the FAA and MAA over the past year related to the technical components associated with the NextGen implementation. We believe this information will be important as we move forward and continue to grapple with this issue.

With that understanding, and keeping consistent with the RT's purpose, we agree with the comments made to you by the Howard County Office of Law in a letter dated March 9, 2018. Their comments are in reference to the Draft Environmental Assessment at Baltimore/Washington International Thurgood Marshall Airport (BWI) dated January 5, 2018. It was prepared by the MAA for approval by the FAA and in support of the proposed expansion of BWI thru 2020. Massive development of BWI is proposed which would result in increased aircraft operations and therefore airplane noise. Community outreach by both the MAA and FAA has been substantially nonexistent.

The Howard County Office of Law pointed out the Draft EA is legally insufficient in several respects:

- It is not based on sufficient evidence.
- It is based on non-representative and outdated noise data that the MAA has acknowledged does not reflect actual conditions.
- The FAA 14 CFR Part 150 Noise Compatibility Planning process is not addressed in the Draft EA. This invalidates all of the assumptions about harmful impacts due to noise based on FAA compliance with Part 150 Planning and the outdated data.
- It completely fails to acknowledge the highly controversial and significant harmful impacts that aircraft noise has had on Maryland citizens as a result of the FAA's implementation of NextGen.
- It fails to include sufficient analysis of other environmental impacts related to air quality, climate change, land use, historic preservation, and deforestation, and its almost complete failure to consider impacts in Howard and Anne Arundel Counties.

In addition, the RT is including an attachment which shows the number of aircraft operations that have taken place on an annual basis at BWI since 2006. Operations totaled 266,790 in 2006, reached a low of 245,121 in 2014 and in 2017 reached 261,707. Airport expansion is not needed when operations have not exceeded or even reached the levels seen in 2006. Any projections made by the MAA are therefore suspect and unsupported by actual operations.

We will request that the FAA deny approval of the Proposed Action. We will also request that the FAA order the MAA to perform a full Environmental Impact Statement pursuant to NEPA, NHPA, and Section 4(f). Additionally, we will request the FAA include the RT in this action. We strongly believe the RTs current involvement at the insistence of the FAA should include participation in the Environmental Impact Statement process.

Very sincerely,

Lance Brasher
Chairman
DC Metroplex BWI Community Roundtable

CC:

The Honorable Lawrence J. Hogan, Governor, State of Maryland
The Honorable Brian H. Frosh, Attorney General, State of Maryland
The Honorable Andrew P. Harris, MD
The Honorable C.A. Dutch Ruppertsberger
The Honorable Anthony G. Brown
The Honorable John P. Sarbanes
The Honorable Steny H. Hoyer
The Honorable John K. Delaney
The Honorable Elijah E. Cummings
The Honorable Jamie B. Raskin
The Honorable Benjamin L. Cardin
The Honorable Christopher Van Hollen, Jr.
The Honorable Allan H. Kittleman, County Executive
The Honorable Steven R. Schuh, County Executive
The Honorable Jonathan S. Weinstein, County Council Member & Council Chairperson
The Honorable Michael A. Puroutka, County Council Member & Council Chairperson
The Honorable. James E. De Grange
The Honorable Edward J. Kasemeyer
The Honorable Guy J. Guzzone
The Honorable Edward R. Reilly
The Honorable Bryan W. Simonaire
The Honorable Gail H. Bates
The Honorable Shirley Nathan-Pulliam
The Honorable John C. Astle

Attachment (1)

Annual Traffic

Traffic by calendar year

	Passengers	Change from previous year	Aircraft operations	Cargo (pounds) ^[84]
2006	20,698,967		266,790	252,413,171
2007	21,044,384	▲1.67%	265,424	254,701,295
2008	20,488,881	▼2.64%	249,456	225,275,286
2009	20,953,615	▲2.27%	245,522	221,302,348
2010	21,936,461	▲4.69%	253,165	225,706,183
2011	22,391,785	▲2.08%	258,475	237,568,354
2012	22,679,987	▲1.29%	268,186	246,366,867
2013	22,498,353	▼0.80%	259,793	240,295,725
2014	22,312,676	▼0.83%	245,121	231,862,614
2015	23,823,532	▲6.77%	246,464	257,266,277
2016	25,122,651	▲5.45%	248,585	260,309,358
2017	26,369,411	▲4.96%	261,707	370,098,296