ALLIANCE FOR INNOVATION AND INFRASTRUCTURE

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Mr. Owen Morgan
U.S. Department of Transportation
Deputy Assistant Secretary for Transportation Policy
1200 New Jersey Ave. SE,
Washington, DC 20590

Re: Request for Information, "Revitalizing Washington Dulles International Airport"
Docket No. DOT-OST-2025-1887

The Alliance for Innovation and Infrastructure (Aii) highly appreciates the U.S. Department of Transportation's (USDOT) leadership in asking for public comment as it seeks to return innovation to American infrastructure. This Request for Information (RFI) represents a bold strategic and practical step, and we appreciate its focus on the revitalization of Washington Dulles International Airport (IAD).

Aii is a national, nonpartisan think tank dedicated to advancing innovation in infrastructure policy, financing, and delivery. Aii focuses on practical, cross-sector solutions that align public policy with private investment to deliver major infrastructure projects.

Airports represent some of the nation's most consequential infrastructure assets, serving as engines of economic growth, international trade, national competitiveness, and key mobility. Aii strongly supports a comprehensive revitalization of Dulles that improves the passenger experience, operational efficiency, infrastructure resilience, and long-term economic sustainability.

This RFI presents an opportunity not merely for incremental modernization but for a generational transformation of Washington Dulles International Airport. Given the airport's scale, location, and role as a primary international gateway into the United States, we encourage the Department to evaluate concepts that reimagine Dulles as a fully developed, economically-productive airport campus integrated into the national transportation and commerce system, rather than merely an aviation facility. To achieve this, we believe the best combination of public oversight and private project delivery will be needed. This opportunity will not be fully seized with half measures or falling back to older models, but requires embracing innovative design, delivery, and management at every stage.

Federal Stewardship and Institutional Context

Unlike many large U.S. airports, Dulles is located on federally owned land and is operated by the Metropolitan Washington Airports Authority (MWAA) pursuant to a long-term federal lease and an interstate compact. This structure gives the federal government, and the Department of Transportation in particular, a legitimate and enduring interest in the airport's long-term stewardship, management, land use, and financial sustainability beyond day-to-day aviation operations.

This institutional context distinguishes Dulles from locally-owned airports. It provides a clear rationale for sustained federal involvement in evaluating long-term development concepts, revenue diversification strategies, regional economic vitality, and public-private partnership structures that maximize the value of a significant federal asset while preserving public ownership and oversight.

Design and Terminal Configuration

A revitalization strategy should emphasize passenger flow, reduced transfer times, modernized layouts, and intermodal connectivity. When President Kennedy dedicated the airport in 1962, he correctly predicted that the building would "...symbolize the aspirations of the United States."[1] Although the Eero Saarinen-designed main terminal remains an architectural landmark, the airport's functional components no longer reflect that aspiration.

Successful airport revitalizations demonstrate that design quality is both design-related and operational. Modernized terminals that reduce journey time, improve reliability, and simplify passenger circulation materially influence traveler preference, airline scheduling decisions, and overall airport demand.[2] In turn, increased enplanements strengthen an airport's revenue base for services such as parking, concession activities, airline operations, and more. In a multi-airport region such as the National Capital Area, service quality and capability directly affect enplanements, particularly for international and connecting traffic.[3][4] Increased enplanements, in turn, strengthen the airport's revenue base across concessions, parking, airline activity, and ancillary services.

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[1] White House Audio Collection. Remarks at the Dedication of the Dulles International Airport, Chantilly, Virginia, 17 November 1962. https://www.jfklibrary.org/asset-viewer/archives/jfkwha-143-009.

[2] Airports Council International. (2018, June 29). *ACI White Paper: Customer Service is the Airport's Strongest Driver of Non-Aeronautical Revenue*. Cision PR Newswire. https://www.prnewswire.com/news-releases/aci-white-paper-customer-service-is-the-airports-strongest-driver-of-non-aeronautical-revenue-576960811.html.

[3] Fodness, D., & Murray, B. (2007). Passengers' expectations of airport service quality. *Journal of Services Marketing*, *21*(7), 492–506. https://doi.org/10.1108/08876040710824852.

[4] Muñoz-Hoyos, C. H., Sarmiento-Ordosgoitia, I., & Cordoba-Maquilón, J. E. (2014). Airport Terminal Choice Model. *DYNA*, *81*(187), 144–151. https://doi.org/10.15446/dyna.v81n187.40825.

The single largest constraint to Dulles' functionality remains the continued reliance on the temporary C/D concourse complex. One might actually forget that these facilities were constructed in 1983 as a short-term solution. Instead, these 'perminary' facilities now approach five decades of use and stand in sharp contrast to the original terminal design's intentionality.[5] Replacement of these temporary structures should be a central objective of any revitalization strategy, consistent with the airport's original master planning vision.

Similarly, while the AeroTrain system represented a major improvement, it remains an incomplete solution, ending up in configurations that require long walking distances and continued reliance on mobile lounges. The continued use of undignified mobile lounges presents serious operational drawbacks, passenger inconvenience, and major safety concerns.[6] Eliminating their use through fixed-guideway connections or redesigned concourse layouts should be treated as a priority in any redevelopment effort.

As a model for revitalization, the Department should look to the recent "Terminal Renewal and Improvement Program" (TRIP) at Dallas-Fort Worth International Airport (DFW). Facing aging infrastructure and a demand surge similar to Dulles, DFW executed a $2.7 billion overhaul to completely rebuild its original 1974 terminals without disrupting operations.[7] By replacing outdated utility systems and introducing new terminals, DFW successfully revitalized its outdated layout into a world-class facility. The airport was subsequently named "Best Airport in North America" by the Airports Council International (ACI) for three consecutive years and has had its economic contribution to the Dallas-Fort Worth area swell to $78 billion.[8,9]

Long-Term Capacity and Passenger Throughput

From a functional perspective, a revitalized Dulles should be designed to materially reduce total passenger journey time from curb to gate and from gate to ground transportation. These priorities should include minimizing circulation bottlenecks, eliminating unnecessary modal transfers, expanding fixed connections between terminals, and designing concourses that support higher gate utilization and next-generation aircraft. Design concepts should explicitly anticipate long-

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[5] Metropolitan Washington Airports Authority. (2006). *D2 Projects: Concourse C/D*. mwaa.com. https://www.mwaa.com/business/d2-projects-concourse-cd.

[6] NBC4 Washington. (2025, November 20). *Dulles Mobile Lounge involved in 2nd crash This Month*. NBC4 Washington. https://www.nbcwashington.com/news/local/mobile-lounge-collision-dulles/4018361/.

[7] *Terminal Renewal and Improvement Programme (TRIP), Dallas Fort Worth Airport, Texas*. Airport Technology. (2022, July 6). https://www.airport-technology.com/projects/terminal-renewal-and-improvement-programme-trip-dallas-fort-worth-airport-texas/.

[8] *DFW Named Best Airport in North America Serving Over 40 Million Passengers for Third-Consecutive Year*. Dallas Fort Worth International Airport. (2025, March 10). https://www.dfwairport.com/dfwnewsroom/dfw-named-best-airport-in-north-america/.

[9] *Study: DFW Airport Now Contributes $78.3 Billion Annually to North Texas Economy, Supports 684,000 Jobs* . Dallas Fort Worth International Airport. (2025b, December 3). https://www.dfwairport.com/dfwnewsroom/study-dfw-airport-now-contributes-usd78-3-billion-annually-to-north-texas/.

haul international growth and evolving aircraft technology rather than accommodating only current demand.

MWAA files indicate that with Dulles' growth in total customers, it is in a strong economic position.[10] In 2024, the airport had 10.4 million international passengers out of 27.2 million total passengers, one of the highest percentages among U.S. airports.[11] Aii recommends that the Department and MWAA consider delivery strategies promoting parallel construction activities, early completion of crucial enabling infrastructure, and flexibility to adapt as conditions evolve. Accelerated timelines, where feasible, can reduce overall disruption and deliver benefits to users sooner, especially in the crucial international market.

Land Use, Campus Development, and Revenue Diversification

Washington Dulles International Airport encompasses approximately 13,000 acres, making it one of the largest airport landholdings in the world. Much of this land remains underutilized relative to its key location within Northern Virginia's technology, logistics, and federal contracting corridor. We encourage the Department to view Dulles not solely as a terminal complex, but as a nationally significant transportation and economic campus.

Experience at peer airports demonstrates that long-term economic durability increasingly depends on diversified, non-aeronautical revenue streams that complement core aviation functions. These may include aviation-adjacent commercial development, logistics and cargo facilities, hotels and conference uses, aircraft maintenance and support services, and other compatible transportation-oriented activities. Properly structured, such uses strengthen the airport's financial base, reduce reliance on airline fees, and support reinvestment in core aviation infrastructure.

Dallas-Fort Worth International Airport again provides a pertinent organizational example. Over several decades, DFW deliberately leveraged its extensive land holdings through long-term ground leases, secondary and tertiary aviation uses, and transportation-oriented commercial development. This strategy established stable revenue streams while strengthening the airport's role as a regional economic anchor, rather than treating surplus land as incidental or peripheral.

Dulles is uniquely positioned to pursue a similar, yet context-specific, approach. Its location within the nation's largest concentration of data centers, proximity to federal agencies and international institutions, and role as a primary international gateway create development

[10] Metropolitan Washington Airports Authority. (2025, March). MWAA 2024 Annual Comprehensive Financial Report. https://www.mwaa.com/sites/mwaa.com/files/2024%20ACFR%20-%20FINAL%203.28.25.pdf.
[11] *The business of the business case: Washington Dulles International Airport*. Air Service One. (2025, September 23). https://airserviceone.com/the-business-of-the-business-case-washington-dulles-international-airport/.

opportunities that support aviation demand and remain consistent with public stewardship objectives.

Access Infrastructure and the Dulles Toll Road

The Dulles Toll Road is another key asset that distinguishes Dulles from most major U.S. airports. While owned by the Commonwealth of Virginia, the Toll Road is operated by MWAA and functions as the primary vehicular access corridor to the airport. Toll revenues are contractually dedicated to airport-related transportation purposes, including access improvements and capital obligations.

Integrated planning between airport land use, terminal redevelopment, and access infrastructure can strengthen overall system performance without redirecting toll revenues from their intended purposes. Improved campus development, employment density, and commercial activity can strengthen traffic volumes, credit stability, and long-term financing capacity across the wider Dulles transportation system. The Toll Road should therefore be considered part of a coordinated access and economic framework rather than as a standalone facility.

Project Structure and Public-Private Partnerships

Aii encourages consideration of public-private partnerships (P3s) as a core element of any revitalization strategy. Properly structured P3s allow the public sector to access private-sector expertise in lifecycle asset management, integrated delivery, and revenue optimization while continuing to ensure public ownership and oversight.[12] The successful redevelopment of LaGuardia International Airport (LGA) illustrates how comprehensive P3 structures can accelerate delivery, transfer risk, and improve long-term asset performance when supported by strong governance.[13,14] The upgrades at LGA will reduce long-term maintenance costs, increase efficiency, and improve passenger satisfaction.[15,16] For Dulles, early-stage cost estimates should be evaluated in the context of long-term operational savings and passenger throughput gains rather than solely on upfront construction expenses.

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[12] Bipartisan Policy Center. (2023, October 13). Eight airport public-private partnerships taking off in the U.S. https://bipartisanpolicy.org/article/eight-airport-public-private-partnerships-taking-off-in-the-u-s/.

[13] Cole, C. [AI Agent] (2025, May 9). *Jacmel Partners' P3 gamble pays off: Laguardia Terminal B's model for Infrastructure Success*. AInvest. https://www.ainvest.com/news/jacmel-partners-p3-gamble-pays-laguardia-terminal-model-infrastructure-success-2505/.

[14] LaGuardia Gateway Partners. (2025). *Terminal redevelopment*. LaGuardia Terminal B. https://laguardiab.com/about-us/terminal-redevelopment.

[15] LaGuardia Gateway Partners. (2025). *Sustainability*. Laguardiab.com. https://laguardiab.com/about-us/environment-social-governance/sustainability.

[16] Port Authority of New York and New Jersey. (2025, March 11). *World's leading passenger survey recognizes Laguardia Airport as North America's best in class for second consecutive year*. panynj.gov. https://www.panynj.gov/port-authority/en/press-room/press-release-archives/2025-press-releases/world-s-leading-passenger-survey-recognizes-laguardia-airport-as.html.

At Dulles, P3 models should be evaluated not only for terminal construction but also for integrated campus-scale development that is consistent with design, financing, operations, and maintenance incentives. These structures can support phased redevelopment, reduce fragmentation, and create clearer accountability across complex, multi-decade projects. Any P3 framework should contain specific safeguards to guarantee affordability for airlines and passengers and to preserve the airport's public mission.

Phasing, Risk, and Operational Continuity

The scale of a Dulles revitalization calls for cautious phasing to sustain seamless service for more than 25 million annual passengers, including a high proportion of international travelers.[17] Phased construction strategies, early enabling works, and parallel delivery of critical infrastructure can reduce interruption while accelerating benefits. Lessons from other large airport projects point up the importance of realistic risk allocation, experienced partners, and clear decision-making authority. For example, Portland International Airport's (PDX) ongoing redevelopment shows how a clear terminal concept can simultaneously enhance capacity and efficiency while elevating passenger experience.

However, difficulties encountered at other P3 airport expansions highlight the consequences that can arise when governance is unclear, incentives are misaligned, and priorities are unclear. For example, a recent airport expansion at Denver International Airport (DEN) operating under a P3 was ultimately cancelled after the project was over budget and fell years behind schedule.[18]

While federal funding could be available for this project, the primary consideration of these types of projects is the ability to mitigate monetary risk away from taxpayers and onto the private sector. Simplicity and speed of execution, coupled with a single point of accountability, are not only highly desired but necessary. A lessons-learned report concluded that poor planning and inexperience with P3 projects ultimately doomed the expansion and caused service issues at the airport.[19] These lessons reinforce the requirement for meticulous upfront structuring to ensure that ambition is matched by execution capacity.

Conclusion

Airports are among the most economically and strategically important components of the nation's infrastructure system. They support millions of jobs, enable domestic and international commerce, and connect American businesses and communities to global markets. A revitalized

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[17] McCaffrey, S. (2025, March 2). *Dulles Airport's 2024 passenger total set new all-time record*. FFXnow. https://www.ffxnow.com/2025/03/03/dulles-airports-2024-passenger-total-set-new-all-time-record/.

[18] Thibault, M. (2022, August 16). *Report details what went wrong at Denver Airport's Great Hall Project*. Construction Dive. https://www.constructiondive.com/news/denver-great-hall-project-new-report-what-went-wrong/629795/.

[19] Denver International Airport. (2022, August). *Great Hall after-action report: Lessons learned*. City and County of Denver. https://www.documentcloud.org/documents/22130080-great-hall-after-action-lessons-learned-report/.

Washington Dulles International Airport would strengthen the Capital Region's competitiveness, bolster the U.S. aviation network, and demonstrate how federally stewarded infrastructure assets can be modernized through disciplined, creative methods. We extend appreciation to the Department for its leadership in initiating this RFI and encourage further examination of solutions that maximize long-term public value while protecting public accountability.

Respectfully submitted,

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