



August 23, 2018

Federal Aviation Administration Air Traffic Review Team
VIA ELECTRONIC SUBMISSION

Re: KBUR Proposed SID Procedures OROSZ THREE and SLAPP THREE

Dear Federal Aviation Administration Air Traffic Review Team:

The City of Los Angeles ("City") provides these comments in response to the Federal Aviation Administration's ("FAA") request for comments on the above-referenced proposed OROSZ THREE and SLAPP THREE RNAV procedures.

FAA's proposed procedures would create and then concentrate aircraft overflights above homes, schools, places of worship, parks, recreation centers, and historic sites, introducing noise that previously was not present, or not present to the same degree. Thus, the City has a profound interest in the proposed procedures and their impact.

As contemplated, the proposed procedures would cause a substantial shift in and concentration of southbound departures from the Hollywood Burbank Airport ("KBUR") and, therefore, will require thorough environmental review and consideration of alternatives. FAA must and should prepare and circulate, at a minimum, an Environmental Assessment ("EA") for the proposed alternatives that provides a thorough analysis of impacts to the range of affected resources and alternatives to the proposed procedures.

The existing OROSZ TWO and SLAPP TWO conventional SID procedures provide for a climbing right-turn procedure at 210 degrees and then manual vectors to connect to the TILLR waypoint. These procedures have aircraft turning quickly to the right after departures from Runway 15 so that the vast majority of radar tracks turn west and then northwest over North Hollywood and Valley Village. These flight tracks are dispersed widely, consistent with conventional departure procedures and manual vectors.

OROSZ THREE and SLAPP THREE would provide an RNAV route well to the south of existing procedures, providing waypoints JAYTE and TEAGN south of U.S. Highway 101 in the eastern portion of the Santa Monica Mountains. This would shift these routes over Studio City and Sherman Oaks with residential, historic, park, wildlife and other land uses. Because the new routes will be over the Santa Monica Mountains, homes, schools and parks will be closer to the departing aircraft than other portions of the San Fernando Valley to the north.

FAA's proposed changes will cause a fundamental shift in the noise environment near KBUR that will require at least an EA. Pursuant to FAA Order 1050.1F, FAA cannot rely on a categorical exclusion if "extraordinary circumstances" exist. See FAA Order 1050.1F ¶ 5-2. In the case of the proposed shift of the current OROSZ and SLAPP traffic to the new, concentrated corridor, at least the following extraordinary circumstances exist that require the preparation of an EA:

1. An impact on cultural resources protected under the National Historic Preservation Act, including the historic properties located under or near the proposed routes identified in Attachment 1 to these comments. See FAA Order 1050.1F ¶ 5-2(b)(1).
2. An impact on properties protected under Section 4(f) of the Department of Transportation Act. See FAA Order 1050.1F ¶ 5-2(b)(2). This includes the parks and wildlife refuges of the Santa Monica Mountains Conservancy identified in Attachment 2 to these comments. The Santa Monica Mountains Conservancy was established by the California State Legislature in 1980 to preserve parkland and wildlife habitat in the Santa Monica Mountains, as well as provide an interlinking system of parks, trails and wildlife habitats. Many of the portions of the Conservancy in the area of concern experience natural quiet and are intended to provide by visitors and wildlife with quiet refuges from the urbanized fabric of the City. Because Los Angeles has a deficit of park space on a per capita basis, protecting the attributes of the City's recreational spaces is critical. The City considers quiet to be a critical element of the region's parks, and it considers FAA's DNL 65 dB threshold of significance typically provided to urban or suburban ballfields to be inappropriate.
3. An impact on noise levels of noise sensitive areas and impacts on the quality of the human environment that are likely to be highly controversial on environmental grounds. See FAA Order 1050.1F ¶ 5-2(b)(7), (10). While FAA has not released any noise modeling studies, it is evident that the OROSZ and SLAPP procedures would significantly change the noise

environment in the area of the routes in a manner that City has determined would be highly controversial on environmental grounds. First, as noted, the new RNAV routes will shift the flight tracks south over new areas in the Santa Monica Mountains. Second, the rising terrain of the Mountains will put residents, parks, schools, historic resources and other land uses closer to the departing aircraft and the canyons of these mountains concentrate and reflect sound, resulting in significantly greater noise impacts than routes over the San Fernando Valley floor. Third, the RNAV route will concentrate noise over the areas overflowed to a far greater degree than the current conventional routes. FAA has acknowledged this “noise focusing” factor:

The term used to characterize the concentration of noise is “noise focusing.” The actual flight tracks of aircraft flown on conventional [instrument flight procedures] using ground-based Navigational Aids (NAVAIDs) show broad dispersion around the trajectory of the defined procedures. The dispersion is typically based on the performance characteristics of individual aircraft types and pilot technique. In contrast, FAA’s experience with satellite-based navigation procedures shows that actual flight tracks and [Next Generation] procedures converge to a much greater degree. Therefore, aircraft flying [Next Generation] procedures and the associated noise are concentrated over a smaller area than would be the case for the same operations using conventional, [non-Next Generation instrument flight procedures.]

FAA Order 7400.2K, Procedures for Handling Airspace Matters at ¶ 32-2-2.e. The highly controversial nature of the procedures has already been confirmed by the press coverage for this proposal and the comments that residents, schools and others have already filed based on tests of the procedure.

In preparing the EA, as required under FAA Order 1050.1F, the City requests that FAA consider reasonable alternatives that may reduce total noise impacts, including the alternative along the U.S. Highway 101 proposed by the Burbank-Glendale Pasadena Airport Authority in its comments submitted to FAA. The FAA should carefully address environmental justice, land use, noise, Section 4(f), school, historic, cultural, and wildlife impacts associated with the routes, along with differences in air emissions associated with longer flight paths.

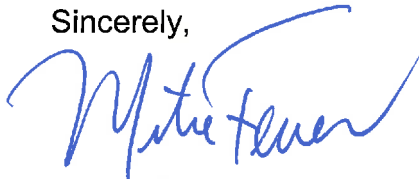
The City strongly recommends that FAA engage in early, collaborative outreach to the community to identify possible alternatives and impacts. See FAA Community Involvement Manual (Feb. 2016) (“decisions that take community input into consideration are more likely to reflect the collective public interest, receive broader

community acceptance, and experience fewer implementation and post-implementation problems"). The City understands the need to provide safe and efficient airspace procedures that also minimizes noise impacts to the extent possible.

Because FAA will be required to undertake environmental review and seek public and agency comment, the City reserves the right to provide additional information and comments as more information regarding these procedures becomes available.

We would gladly provide any additional information you may require in order to develop a less harmful set of procedures. We look forward to your prompt response to our concerns and your anticipated future cooperation.

Sincerely,

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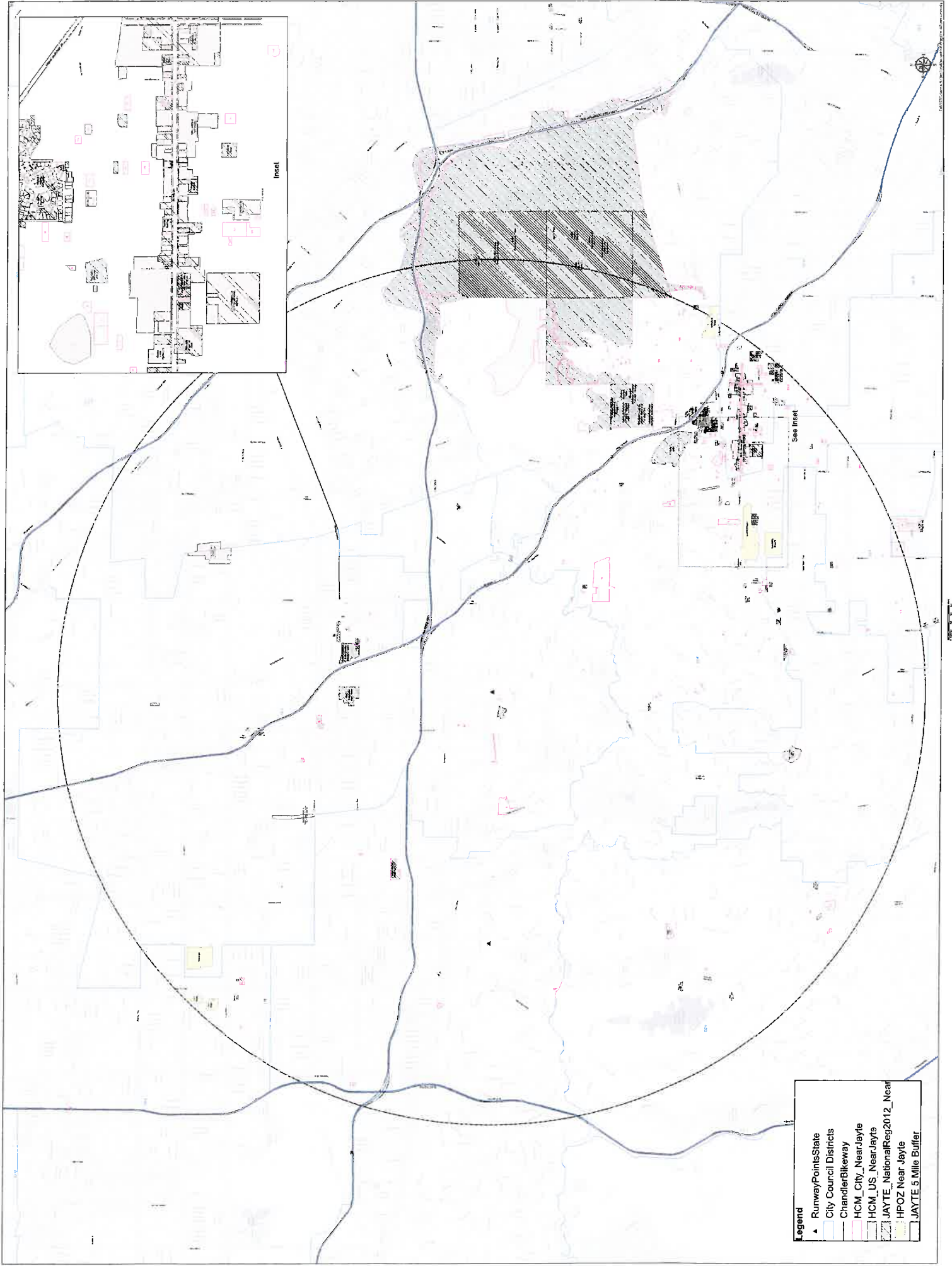
MICHAEL N. FEUER
Los Angeles City Attorney

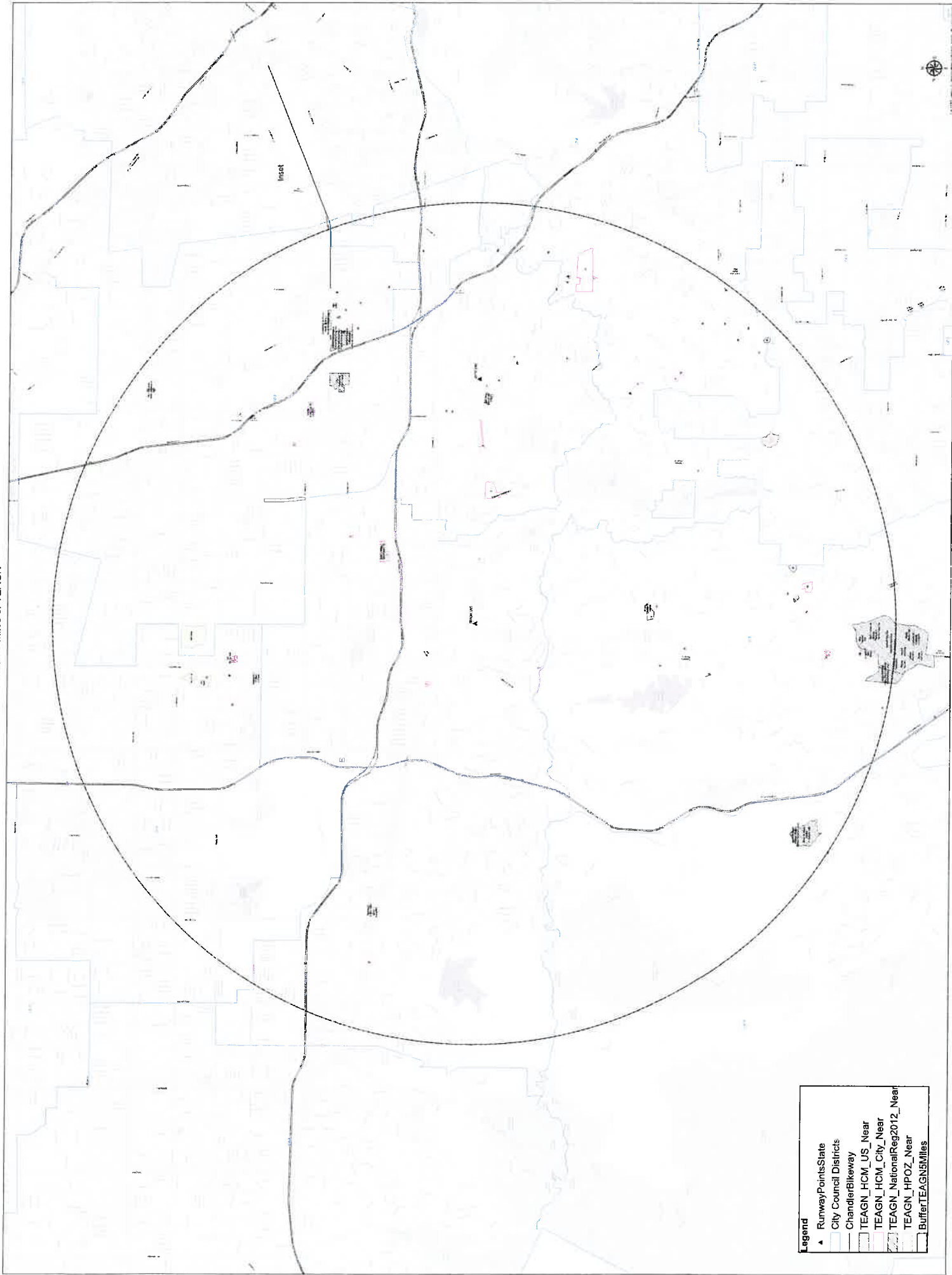
A handwritten signature in blue ink, appearing to read "Paul Krekorian".

PAUL KREKORIAN
Councilmember, Second District

ATTACHMENT ONE

**EXAMPLES OF HISTORIC AND CULTURAL RESOURCES IN THE VICINITY OF THE PROPOSED OROSZ THREE
AND SLAPP THREE PROCEDURES**





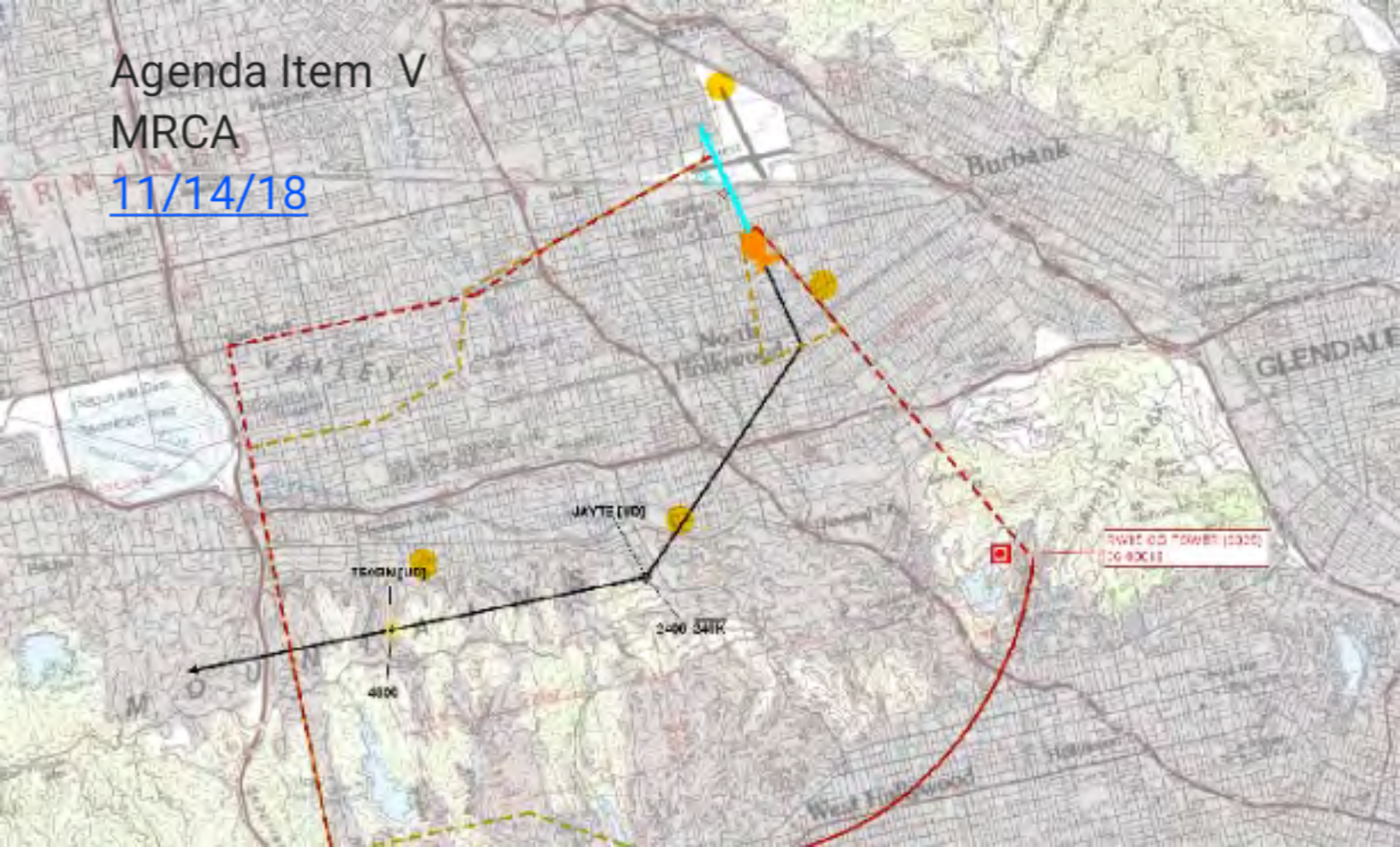
ATTACHMENT TWO

EXAMPLES OF PARK AND OTHER SECTION 4(f) RESOURCES IN THE SANTA MONICA MOUNTAINS CONSERVANCY UNDER OR ADJACENT TO THE PROPOSED OROSZ THREE AND SLAPP THREE PROCEDURES

- Beverly Glen Park
- Briar Summit Open Space Reserve
- Coldwater Canyon Park
- Deervale-Stone Canyon Park
- Dixie Canyon Park
- Fossil Ridge Park
- Franklin Canyon Park
- Fryman Canyon Park
- Longridge Park
- MRCA Open Space
- Wilacre Park

Agenda Item V
MRCA

11/14/18





December 10, 2018

The Honorable Daniel K. Elwell
Acting Administrator
Federal Aviation Administration
800 Independence Ave SW
Washington, DC 20591

Re: Proposed Amendment to OROSZ and SLAPP Area Navigation Departure Procedures at
Hollywood Burbank Airport — Request for Consideration of Dispersal Headings/Other
Lateral Track Variations to Address Community Noise Concerns

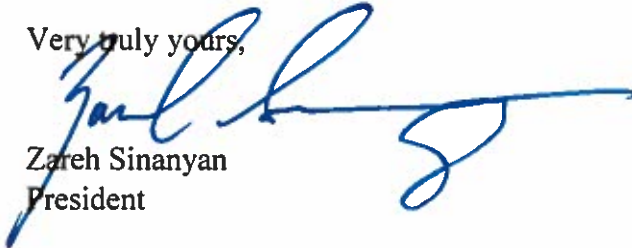
Dear Administrator Elwell:

The Federal Aviation Administration (“FAA”) recently solicited public comments on proposed amendments to the OROSZ and SLAPP area navigation departure (“RNAV”) procedures at Bob Hope Airport (commonly known as Hollywood Burbank Airport) (“Airport”). The Burbank-Glendale-Pasadena Airport Authority (“Authority”), owner and operator of the Airport, respectfully submits this letter pursuant to Section 175 of the FAA Reauthorization Act of 2018 (“Act”) to request that you consider the feasibility of dispersal headings or other lateral track variations to address community noise concerns.

Earlier this year, in response to a significant increase in noise complaints, the Authority retained the firm Landrum & Brown, Inc. (“L&B”) to prepare a flight path analysis and report on the impact of the FAA’s implementation of NextGen in the Southern California Metroplex. L&B presented its findings to the Authority’s Operations & Development Committee at an evening meeting on October 18, 2018. There was exceptionally high public attendance — hundreds of people were accommodated in the meeting room and an overflow space had to be provided. Dozens of public speakers, most of whom are residents of the Studio City and Sherman Oaks neighborhoods in the City of Los Angeles, expressed concerns about increased aircraft noise experienced since the FAA’s March 2017 NextGen implementation in the Southern California Metroplex.

As such, the Authority has consulted with the affected community and makes this request that the proposed OROSZ and SLAPP RNAV amendments not be approved until the FAA analyzes the feasibility of dispersal headings or other lateral track variations to address community noise concerns. Thank you for your attention to this important matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Zareh Sinanyan', is written over the closing 'yours,'.

Zareh Sinanyan
President

cc: FAA Operations Support Group, C/O Public Comments

The Honorable Adam Schiff, Member of Congress, California District 28

The Honorable Brad Sherman, Member of Congress, California District 30

The Honorable Eric Garcetti, Mayor, City of Los Angeles

The Honorable Paul Kerkorian, Council Member, City of Los Angeles

The Honorable Emily Gable-Luddy, Mayor, City of Burbank

Commission Members, Burbank-Glendale-Pasadena Airport Authority

HOLLY L. WOLCOTT
CITY CLERK

SHANNON D. HOPPE
EXECUTIVE OFFICER

City of Los Angeles
CALIFORNIA



ERIC GARCETTI
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER

CLERK.LACITY.ORG

When making inquiries relative to
this matter, please refer to the
Council File No.: [18-1162](#)

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

December 14, 2018

Council File No.: [18-1162](#)

Council Meeting Date: December 12, 2018

Agenda Item No.: 34

Agenda Description: COMMUNICATION FROM THE CHIEF LEGISLATIVE ANALYST and RESOLUTION relative to communicating the City's position to the Federal Aviation Administration regarding flight path changes at Hollywood Burbank Airport.

Council Action: RULES, ELECTIONS, AND INTERGOVERNMENTAL RELATIONS COMMITTEE REPORT AND RESOLUTION - ADOPTED FORTHWITH

Council Vote:

YES BLUMENFIELD
ABSENT BONIN
YES BUSCAINO
YES CEDILLO
YES ENGLANDER

YES HARRIS-DAWSON
YES HUIZAR
YES KORETZ
YES KREKORIAN
YES MARTINEZ

YES O'FARRELL
YES PRICE
YES RODRIGUEZ
YES RYU
YES WESSON

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 231(h)

FILE SENT TO MAYOR:

12/14/2018

LAST DAY FOR MAYOR TO ACT:

12/24/2018



APPROVED

*DISAPPROVED

*VETO

Mayor

12/17/2018

DATE SIGNED

Adopted Report(s)

Title	Date
Report from Rules, Elections, and Intergovernmental Relations Committee	12/11/2018
Communication from the Chief Legislative Analyst - Revised Resolution	12/11/2018

RESOLUTION

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before a local, state or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council with the concurrence of the Mayor; and

WHEREAS, the Federal Aviation Administration (FAA) has proposed amending two existing departure routes (OROSZ TWO and SLAPP ONE) from Hollywood Burbank Airport to include flyover, satellite-based navigation waypoints JAYTE (near Colfax Ave & Ventura Ave in Studio City) and TEAGN (near Hollyline Ave & Valley Vista Blvd in Sherman Oaks); and

WHEREAS, the FAA's Draft Environmental Review for the two proposed departure routes (OROSZ THREE and SLAPP TWO) stated a Finding of No Significant Impact and that the proposed routes would "not significantly increase noise over noise sensitive areas;" and

WHEREAS, these satellite-based routes reduce long established wide dispersion flight paths that historically occur on the initial portion of the aircraft routes, creating a singular narrow path that will concentrate flight paths at low altitudes directly over schools and residential areas in parts of the San Fernando Valley, including over parks, protected open spaces, recreation areas, and wildlife habitats of the Santa Monica Mountains; and

WHEREAS, residents who live south of Burbank Airport and Van Nuys Airport are reporting the presence of aircraft over their homes at low altitudes, and with dramatically increased frequency; and

WHEREAS, the number of noise complaints related to departures from Burbank Airport and Van Nuys Airport have risen dramatically, and there are significant environmental and process concerns in the FAA's review of these new departure routes;

NOW, THEREFORE, BE IT RESOLVED, with the concurrence of the Mayor, that by the adoption of this Resolution, the City of Los Angeles hereby includes in its 2019-2020 Federal Legislative Program OPPOSITION to the proposed OROSZ THREE and SLAPP TWO amended departure routes for Hollywood Burbank Airport and the FAA Draft Environmental Review's Finding of No Significant Impact under the National Environmental Policy Act.

Date: 12/11/18

Submitted in Rules Committee

Council File No: 18-1162

Item No.: 3

~~by~~ Communication from the
Chief Legislative Analyst



MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Los Angeles River Center & Gardens
570 West Avenue Twenty-Six, Suite 100
Los Angeles, California 90065
Phone (323) 221-9944 Fax (323) 221-9934

November 14, 2018

Dan Elwell
Acting Administrator
Air Traffic Review Team
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

**FAA Plans to Change Flight Routes over the San Fernando Valley
KBUR Proposed SID Procedures OROSZ THREE and SLAPP THREE**

Dear Mr. Elwell:

The Mountains Recreation and Conservation Authority (MRCA) is a joint powers entity that both owns and manages over a dozen natural parkland properties on the north face of the Santa Monica Mountains in the most affected area from Studio City to Sherman Oaks. These parklands include four legislatively-established scenic overlooks along the Mulholland Scenic Parkway within the Santa Monica Mountains National Recreation Area. All of these MRCA-managed parklands are open to the public between sunrise and sunset. Some such MRCA-managed parklands are owned by the Santa Monica Mountains Conservancy, State of California and the National Park Service. All of these, and other City of Los Angeles-owned, parklands in the proposed NexGen flight path area are Section 4(f) resources pursuant to the Department of Transportation Act.

It is our understanding that pursuant to FAA Order 1050.1F, that the Federal Aviation Administration (FAA) must consult all appropriate Federal, State, and local officials having jurisdiction over the affected section 4(f) resources when determining whether a project related noise impacts would substantially impair the resources. Parklands are recognized as noise-sensitive 4(f) areas. The MRCA considers quiet to be a critical component of the natural lands visitation experience. The FAA's DNL 65 dB threshold of significance associated with urban or suburban ballfields is insufficient to address the actual impacts to public natural lands within the affected areas of the Santa Monica Mountains. The proposed new flight path has the strong potential to create noise that is inconsistent with many of the MRCA's affected parklands capability of continuing to serve its recreational and refuge purposes. To date the FAA has not adequately weighed the purported operational benefits of the new departure flight path against the indisputable permanent negative impacts to public parkland and natural resources in the Santa Monica Mountains.

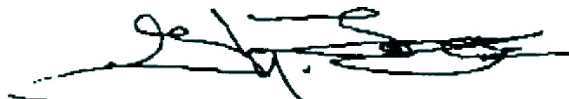
Dan Elwell, Acting Administrator
FAA Plans to Change Flight Paths over the San Fernando Valley
November 14, 2018
Page 2

The MRCA requests first that the public comment period be extended at least until January 19, 2019. The MRCA further insists that at a minimum the FAA address the proposed project impacts in an Environmental Assessment. Given the clear need for alternative routes, an Environmental Impact Statement (EIS) is warranted.

The inescapable fact is that directing departing flights over rising terrain brings noise and pollution impacts progressively closer to actual ground level (AGL) compared to flying over the level terrain of the San Fernando Valley. The proposed flight path would concentrate departing aircraft closer to parklands at an altitude mostly below the mixing level where aircraft exhaust pollutants join the jet stream rather descending directly to earth.

All of these potential impacts must be comprehensively analyzed and compared with alternatives in an EIS. The current proposal of 150-180 departing flights over a narrow one-half-mile-wide way point corridor in rising terrain would irreversibly degrade the visitor experience in natural parklands purchased with tens of millions of dollars of public funding or dedicated as California Environmental Quality Act mitigation for residential development. As Burbank Airport continues to grow its operations at a 15 percent annual rate, the number of flights and associated impacts will progressively increase, thus creating a continually increasing level of cumulative impact that is inconsistent with the recreational and quiet refuge values of the affected natural parklands. This natural parkland is regionally significant and irreplaceable.

Sincerely,

A handwritten signature in black ink, appearing to read "George Lange", written over a horizontal line.

George Lange
Chairperson