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November 17, 2018

Federal Aviation Administration
Operations Support Group
C/O Burbank Public Comments
2200 S. 216th St
Des Moines, WA 98198

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

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

The Studio City Residents Association represents a membership of approximately 2,000 in the San Fernando Valley that reside from north of Mulholland Highway in the Santa Monica Mountains to US101, and from Lankershim Boulevard to Fulton Ave in the east west direction. Additionally the SCRA advocates for the 30,000 residents who reside in Studio City which is a part of City Council District Two, City of Los Angeles.

All of the above referenced residents are heavily impacted from early morning to late at night by jets that depart Hollywood Burbank Airport. These jets are mandated to fly along and at altitudes determined by two Waystations established under the NextGen protocols.

The flight paths from Burbank have been reduced down to a half mile corridor that when coupled with lowering of the altitude between Waypoints plus acceleration leaving Waypoints to gain altitude have made for a situation that heavily impacts not only residents but businesses and property values.

For example but not all inclusive: Film shoots, arranged by Film LA pursuant to a city issued permit, are a large economic engine in the San Fernando Valley and have to suspend filming frequently due to the jet noise from Hollywood Burbank Airport. Realtors report increased difficulty in making and closing sales of single family properties when the noise disclosure statement becomes known. Outdoor family back yard activities are limited, Parks and open spaces fail to provide relief. The health of school children are compromised when jets fly low without the benefit of pollutants dispersed over broader areas and higher altitudes.

1. A Categorical Exclusion is not appropriate where there are overall cumulative impacts as are referenced above. i.e., impacts of the proposed action when added to other past, present, and reasonably foreseeable future actions may be significant.

The Landrum & Brown study authorized by the Joint Powers Authority that manage Hollywood Burbank Airport indicates the flight tracks have been pushed southward and do not disperse the outgoing flights across a wide range as before: the proposals will worsen that trend. Further, the agency has failed to address the significant cumulative impact.

2. Public controversy: A Categorical Exclusion is inappropriate in circumstances involving highly controversial impacts. FAA Orders provide that the indicators of such controversy include “opposition on environmental grounds by a federal, state, or local government agency.” Congressional, State and LA City Council Members have raised such concerns with the agency. Of note, the Mountains Recreation & Conservation Authority has also joined the above with these concerns.
3. Purpose and need: The FAA has suggested that the proposed action is related to the implementation the Benedict Hills Settlement Agreement. But the terms of the settlement agreement have not been made public therefore refusal to disclose one of the stated bases of the proposed action is contrary to NEPA’s (Congressionally-defined) objectives

The NextGen mandates were imposed and applied with no prior public input or comment prior to implementation. Studio City Resident Association requests the FAA prepare an EIS. (Environmental Impact Statement) or other methodology within its mandate such that any proposal can be reviewed by the general public at large and by those who are elected or appointed representatives or others who may have purview of any proposed FAA action.

The overriding controversy simply stated is that the NEXGEN protocols impose the impact directly on certain areas. There has been no apparent thought, consideration or review by the agency to spread the burden on an equitable shared basis. .

Respectfully submitted,



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Studio City Residents Association
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cc: Councilmember Paul Krekorian
Assemblymember Adrin Nazarian
Senator Bob Hertzberg
Congressman Brad Sherman
Senators Kamala Harris
Senator Dianne Feinstein