



## HOMEOWNERS OF ENCINO

*"Serving the Homeowners of Encino since 1983"*  
<https://homeownersofencino.wordpress.com/>

GERALD A. SILVER, President  
PO Box 260064, Encino 91426  
Phone 818-990-2757

November 17, 2018

Federal Aviation Administration Operations Support Group c/o Burbank  
Public Comments 2200 S. 216th St Des Moines, WA 98198  
[https://www.faa.gov/nextgen/nextgen\\_near\\_you/community\\_involvement/bur](https://www.faa.gov/nextgen/nextgen_near_you/community_involvement/bur)

Subject: Opposition to Proposed Area Navigation SID at Hollywood Burbank  
Airport (BUR)

Homeowners of Encino (HOME) is a California non-profit corporation duly organized and existing under the laws of the State of California. Homeowners of Encino is a public benefit association organized for the purpose of promoting social welfare. HOME has members in good standing that live, own or rent property that is impacted by this aircraft rerouting project. Rerouting will generate aircraft noise over Encino and will severely impact the residents' quality of life. Please add the comments below to the official FAA record.

The FAA held several public workshops on November 7<sup>th</sup> and 8<sup>th</sup> to address the severe noise problems from the Hollywood Burbank Airport's southerly departure rerouting. These specifically described proposed amendments to the departure profiles that reroute aircraft over Encino south of Ventura Blvd. and over the Santa Monica mountains. This problem is exacerbated by the recent departure rerouting from Van Nuys Airport (VNY). A resident has accurately summed up the VNY and BUR rerouting problems:

"I am hammered every other minute with BUR planes flying over my house when I used to have none!!!! Also I have witnessed them flying as far west as Tarzana and hugging Mulholland at Reseda Blvd. I had noticed a partial implementation in the last few months but this is full blown and is a nightmare." ["LR" Friday, November 16, 2018 6:28 PM]

### **Inadequate public outreach on major jet route changes**

HOME opposes the FAA rerouting jet departures over Encino, Sherman Oaks and Studio City as part of its national NextGen realignment program Metroplex. Departing Van Nuys and Burbank jets are using new FAA departure procedures and Waypoints that follow narrow, concentrated straight lines rather than fanning out over a wide range creating enormous new noise problems for Encino residents. The public

received no public notice of the BUR and VNY departure profile changes. This increase in the number of noisy jet departures as a direct result of changes in FAA departure procedures must be halted immediately.

### **Improper Use of a Categorical Exclusion (CATEX)**

The improper use of the Categorical Exclusion (CATEX) reported by *Studio City for Quiet Skies* accurately describes the environmental problems and why a comprehensive Environmental Impact Statement (EIS) is required instead of a Categorical Exclusion (CATEX).

1. A Categorical Exclusion (CATEX) is inappropriate in this situation, which involves “highly controversial” circumstances such as degradation of 4(f) noise sensitive protected parkland and monuments, opposition by local, state, and federal officials, as well as the protest of thousands of community members. 2. The CATEX does not consider the “cumulative impacts” of nearby flight paths from Van Nuys Airport, the proposed \$1.24 billion expansion of Burbank, and a projected 15% increase per year in air traffic. 3. The proposed procedures degrade public, noise-sensitive 4(f) parklands and deprive the public of their right to find refuge from the noise of the city, as well as to participate in healthful recreation. 4. In early 2017, the FAA shifted the flight path over our communities in a “vectored” NextGen-like path without study or notice. The FAA’s CATEX found “No Significant Impact” by comparing the new proposed procedures to this “vectored” focused 2017 path. This is an “artificial baseline.” To do an accurate comparison, the FAA must compare the new procedures to the time period prior to moving the path before NextGen was even being considered (the historical flight path of 2014 or earlier). 5. The FAA has made the decision to place a mandatory waypoint 1,622 feet above 1,400 school children and to create a flight path that brings thousands more students dangerously close to jet pollutants and noise. This is highly unusual and there have been no environmental studies that support the safety of FAA’s reckless decision. 6. FAA has not studied “Reasonable Alternatives” to this highly invasive and destructive flight path, including returning to a dispersed path, multiple paths, or changing the general direction of departures to the north or east. 7. The proposed procedures adversely impact safety. Gaining altitude while flying into a mountainside - with no ground access for emergency vehicles in case of an accident, and the potential for catastrophic urban wildfires - creates extreme danger.

### **Fanning out jet departures shares the noise burden**

Under existing flight rules, Hollywood Burbank jet departures flew south from runway 15, gained altitude then fanned out over a wide range of headings. This distributed noise over a wide ranging number of homes thus sharing the jet departures noise burden. Under the new scheme this has changed for the worst. The departing Burbank jets, using new guidance procedures follow a narrow, concentrated straight line route over Studio City, then west over Sherman Oaks then to Encino, near the Encino Reservoir.

## **HOME urges the following actions immediately**

HOME urges the FAA and elected officials to immediately take the following actions to protect Encino, Sherman Oaks and Studio City residents:

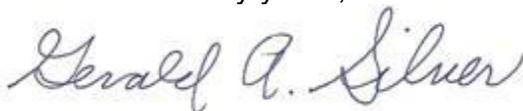
1. Immediately halt the rerouting of jet departures over Encino, Sherman Oaks and Studio City as part of its national NextGen realignment program Metroplex.
2. Require the Los Angeles Chief Assistant City Attorney and the Federal Aviation Administration (FAA), to sign Agreement to Toll the Statute of Limitations, allowing "The Parties ... to meet, exchange information, and explore informal resolution outside litigation."
3. Provide extensive public outreach and hearings before any new jet route changes are implemented.
4. Provide the public with a detailed assessment in simple, clear terms and graphics so the lay public can understand the noise and environmental impacts on the community before any new jet route changes are implemented.

## **Congressional action is needed**

The House of Representatives passed legislation that will require the FAA to consider diverging flight paths and adjusting departure procedure to address community concerns over noise. The bill imposes new requirements for the FAA to follow regarding flight altitude over noise sensitive areas. The FAA will also be required to examine new ways to reduce noise exposure and designate a special regional ombudsman to address the public's concerns about aviation noise.

The FAA must immediately take the lead in solving this critical San Fernando Valley noise problem rather than dragging its feet and ultimately being forced by the Courts and Congress.

Cordially yours,



Gerald A. Silver  
President, Homeowners of Encino (HOME)

Cc Elected officials