

## **Submitted to the FAA via its comment website on November 18, 2018**

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 43 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. At its meeting of November 7, 2018, the Hillside Federation voted to urge the FAA to complete full environmental review in the form of an environmental impact statement (“EIS”) prior to planned publication or implantation of new departure paths from Hollywood Burbank Airport.

The Federation is in complete agreement with comments regarding the proposed departure procedures already submitted to the FAA by Congressman Brad Sherman, Los Angeles City Attorney Michael N. Feuer and Los Angeles City Councilmember Paul Krekorian, and Los Angeles City Councilmember David Ryu. The new procedures will result in greater and more focused noise, which will impact historic resources and many public parkland areas in our park underserved community. Parks and other Section 4(f) noise-sensitive resources in the Santa Monica Mountains under or adjacent to proposed pathways include:

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

In addition, health and safety impacts of the planned changes will likely be experienced by “sensitive receptor” students attending school directly beneath low-altitude departure procedure waypoints, as well as residents and visitors to the Santa Monica Mountains, including park and open space users. Whereas conventional procedures result in broad dispersion patterns, revised NextGen procedures are concentrated over a smaller area. (See FAA Order 7400.2K, Procedures for Handling Airspace Matters at ¶ 32-2-2.e (“FAA’s experience with satellite-based navigation procedures shows that actual flight tracks and [Next-Gen] procedures converge to a much greater degree [than conventional instrument flight procedures].”))

In performing adequate environmental review, the FAA must consider reasonable alternatives to reduce noise, health, and other impacts. It must also consider the cumulative impacts of flight paths from Van Nuys Airport, planned expansion of Burbank Airport, and air traffic increase projections. Studies also identify global warming as a factor in lowering jet altitude and more southerly flight patterns and must

be considered. (Landrum & Brown, Hollywood Burbank Airport Flight Path Analysis, Final Report, pp. 38-39 (Oct. 2018).)

In order for members of the public to have confidence in the final agency decision on a matter of such substantial public controversy, the Hillside Federation urges the FAA not to take action under a categorical exclusion from environmental review. A much more robust public comment process must be undertaken, and an EIS prepared.

Sincerely,

Charley Mims  
President  
Federation of Hillside and Canyon Associations, Inc.