



November 15, 2018

Stephanie C. Harris  
Manager, Flight Procedures Team  
Operations Support Group  
c/o Burbank Public Comments  
2200 South 216th Street  
Des Moines, WA 98198

RE: Request to extend public comment period for the Draft Environmental Review (Proposed Categorical Exclusion) for the Proposed OROSZ THREE and SLAAP TWO (RNAV) Open Standard Instrument Departure Procedures at Hollywood Burbank Airport

Dear Ms. Harris:

We write to request that the public comment period regarding the proposed RNAV procedures under review be extended from 30 to 90 days and that the Federal Aviation Administration (FAA) provide the information and data requested below well before a new comment period closes. As you know, there continues to be significant public interest surrounding these procedures. Yet the Draft Environmental Review report provides neither basic information for public understanding nor the underlying analytical data supporting FAA's decision. Absent such information, the public cannot make informed decisions about whether they should submit comments, and if so, what issues should be addressed by their comments.

This high level of public interest and need for additional information strongly support an extension of the public comment period. Specifically, we are requesting the FAA provide the following information:

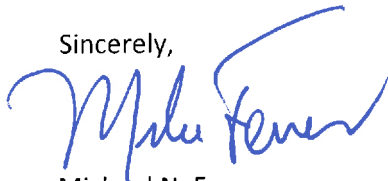
- Precise descriptions of the proposed procedures, including the location and nature of the new RNAV segment. The imprecise descriptions in the Draft Environmental Review Report impede a basic understanding of the proposed procedures.
- Higher quality maps and files showing existing radar tracks and the proposed procedures. In addition, we request TARGETS, AEDT and other input and output files with underlying geographic references. The current maps are low-resolution, small, and otherwise insufficient to convey the location of the proposed procedures. Without this information, the City and the general public are unable to determine exactly where the proposed route will fly vis-à-vis underlying homes, schools, historic properties, parks, etc.

- Detailed information regarding FAA's noise analysis, including data regarding the flight tracks modeled, assumptions about early or late vectors from the RNAV paths, dispersion from the centerline assumed flight track, and assumed receptor elevations. This information is critical to understanding the reasonableness and adequacy of FAA's noise analysis.
- The Aviation Environmental Design Tool (AEDT) Environmental Plug-In, TARGETS, radar track and other information used by FAA, including all input and output files, in native electronic format. Please be advised that Los Angeles City Councilmember Paul Krekorian submitted a FOIA request for these records on October 29, 2018.
- A copy of the FAA's settlement agreement with Benedict Hills Homeowners Association, as the FAA has disclosed that the proposed procedures are tied to implementation of a settlement agreement.

The City and the public need this information and the time to properly analyze it. Such information would allow the City and the public to appreciate the locations and impacts of the proposed flight procedures and provide meaningful comments. A ninety-day comment period, extending the deadline from November 18, 2018 to February 16, 2019 is reasonable, provided that FAA discloses the requested information within the next 30 days.

We thank you for your attention to this request. If you have any questions, please contact Chief Assistant City Attorney David Michaelson at (213) 978-7100.

Sincerely,



Michael N. Feuer  
City Attorney



Paul Krekorian  
Councilmember, Second District



David Ryu  
Councilmember, Fourth District

cc: The Honorable Dianne Feinstein, United States Senate  
The Honorable Kamala Harris, United States Senate  
The Honorable Adam Schiff, United States House of Representatives  
The Honorable Brad Sherman, United States House of Representatives