



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.

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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