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JOINT LEGISLATIVE AUDIT COMMITTEE

November 16, 2018

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

RE: Request to extend public comment period for 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:

I am joining with Los Angeles City Attorney Michael Feuer, Councilmember Paul Krekorian, and Councilmember David Ryu to request 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 requested by Los Angeles City Attorney's office well before a new comment period closes.

The Draft Environmental Review report provides neither basic information for public understanding nor the underlying analytical data supporting the 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.

I also strongly feel that a Categorical Exclusion (CATEX) is inappropriate in this situation where there are "extraordinary circumstances" such as degradation of 4(f) noise-sensitive protected parkland and monuments. The proposed procedures will multiply the negative environmental impacts and cause irreversible damage to the already dwindling parkland and wildlife in Los Angeles.

Parks and other Section 4(f) noise-sensitive resources in the Santa Monica Mountains under or adjacent to the proposed procedures include:

- Beverly Glen Park
- Briar Summit Open Space Reserve

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- 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

Due to the high level of public interest, need for additional information, and the lack of consideration to noise sensitive parkland I strongly support an extension of the public comment period.

Specifically, I am joining with the Los Angeles City Attorney Feuer, Councilmember Krekorian, and Councilmember Ryu requesting the FAA provide the following information.

- Precise descriptions of the procedures, including the location and nature of the new RNAV segment. The imprecise descriptions in the Draft Environment 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 general public is unable to determine exactly where the proposed route will fly vis-à-vis underlying homes, schools, historic properties, and sensitive environmental zones.
- 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 the FAA, including all input and output files, in native electronic format. Please be advised that Los Angeles City Councilmember Paul Krekorian submitted a FOI request for these records on October 29, 2018.
- A copy of the FAA's settlement agreement with the Benedict Hills Homeowners Association, as the FAA has disclosed that the proposed procedures are tied to the implementation of a settlement agreement.

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The public needs this information and the time to properly analyze the data. A 90 day comment period, extending the deadline from November 18, 2018 to February 16, 2019 is reasonable, provided the FAA discloses the requested information within the next 30 days.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adrin Nazarian". The signature is fluid and cursive, with a long horizontal stroke at the end.

Adrin Nazarian  
Assemblymember, 46<sup>th</sup> District