

**BOB HOPE "HOLLYWOOD BURBANK" AIRPORT  
PROPOSED REPLACEMENT TERMINAL PROJECT  
ENVIRONMENTAL IMPACT STATEMENT  
AGENCY AND PUBLIC SCOPING**

**STUDIO CITY FOR QUIET SKIES  
SCOPING COMMENT LETTER AND RESPONSES**

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## ***A. INTRODUCTION***

The FAA has become aware that comments we received during the scoping process for the proposed Bob Hope “Hollywood Burbank” Airport Terminal Replacement Project were inadvertently left out of the scoping report for the Draft Environmental Impact Statement, which the FAA released last week. The FAA has reviewed the comments and determined that the majority were similar or identical to other comments that we received from others during the scoping process. The FAA will address all substantive comments in the Final EIS.

The following presents the two comment letters submitted by Studio City for Quiet Skies followed by responses to those comment letters.

**B. COMMENT LETTER #1**



# STUDIO CITY FOR QUIET SKIES

February 28, 2019

## OFFICIAL COMMENTS ON BURBANK'S NEW EXPANDED TERMINAL

### COMMENT ONE OF TWO COMMENTS

#### Introduction:

\*According to the Federal Register, under the National Environmental Policy Act (NEPA), “an Environmental Impact Statement (EIS) will be prepared to assess the potential impacts of the proposed Replacement Terminal Project and its connected actions.” To ensure that all significant issues are identified, interested agencies and persons shall “submit oral and/or written comments representing the concerns and issues they believe should be addressed” (Federal Register, Vol. 83, No. 242, 12/18/18). The following impact analysis will show that BUR’s “replacement” terminal is essentially an “expansion” that will result in increased operations and efficiency such that it will significantly increase noise and pollution to the surrounding communities. According to NEPA, the FAA must consider all cumulative impacts of the proposed terminal expansion.

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\*This proposed Expanded Terminal represents a profound threat to our LA Valley communities. Through cumulative actions taken by FAA/BUR, our communities and protected parklands have been fundamentally degraded – severely reducing quality of life by massively increasing noise and pollution. The proposed Expanded Terminal at Burbank will guarantee increased efficiency, even without adding more gates. That means more flights, larger jets and jets flying even closer together. The proposed Expanded Terminal will add significantly to the numerous cumulative negative impacts we are already experiencing under the disastrous 2017 change in flight path that occurred without notice or environmental study, resulting in more than 260 overflights per day. **We cannot allow the proposed Expanded Terminal to go forward without fundamental and comprehensive changes in the flight path, protection of our communities and parklands, and limits on airport growth and operations.** FAA’S EIS must define the

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“Affected Area” to include the footprint of procedures overflying the hillside communities of Studio City, Sherman Oaks, and Encino, and the protected 4(f) Santa Monica Mountains. All Environmental Resource Categories should be evaluated and analyzed in the “Affected Area” thus defined.

2

**Cumulative Future Impacts Directly Resulting From Proposed Expanded Terminal:**

\*The terminal expansion must not be considered in a vacuum. The National Environmental Policy Act (NEPA) requires that the FAA evaluate the impact of its action (replacing the terminal) "when added to other past, present, and reasonably foreseeably future actions," whether direct or indirect (40 CFR 1508.7, 1508.8). The impact the proposed Expanded Terminal will have must be considered along with all other cumulative impacts.

3

\*The proposed Expanded Terminal, with its greater size, increased amenities, and improved airside facilities, will increase efficiency, allow for processing of more passengers, and result in a greater number of flights and larger jets. We have already witnessed the occasional large jet, such as a 767, taking off at BUR even with its shorter runways measuring 6,886 (Runway 15/33) and 5,802 feet (Runway 8/26) (Exhibit 0 – Webtrak of 767 on 1/1/19).

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\*The proposed Expanded Terminal is expected to have the same number of gates (14) as the existing terminal. However, with its increased size, it is reasonably foreseeable that more gates will be added in the future, and therefore must be considered as a cumulative impact. All it would take to expand beyond 14 gates is approval by the City of Burbank. The City of Los Angeles would have no say in the matter.

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\*The FAA is underestimating its impact on our communities and underestimating future growth. Although passengers (enplanements) at Burbank Airport (BUR) have increased 31% over the last 3 years (11.07% of that in 2018 alone), the FAA is projecting growth from 2019 through 2029 at only 1.2% to 2.2% annually. (Exhibit 1 - Scoping Enplanement Projections; Exhibit 2 – Excel Growth/Enplanements 31% increase) These projections are simply not credible. In fact, in marketing materials, BUR touts that growth is explosive, stating, "the airline industry is only now beginning to fully recover from the Great Recession" (Exhibit 3 - LA Curbed Article 2/7/19).

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-Furthermore, growth in Air Carrier (AC) operations is up 25% in the last three years. Air Carrier operations (which include Air Taxis), have in recent years, been trending upward rapidly, as a percentage of overall operations -- from 47.7% of total operations in 2015, to **56.4% of total operations in 2018**. A 2015 report from Southern California Association of Governments (SCAG), estimated Burbank Airport’s maximum capacity to be 10.8 to 11.9 million passengers if Air Carriers were 56% of the operational mix. At 56.4% in 2018, we have already surpassed that benchmark. In order to comprehend how great an impact further increases would make to passenger volume, SCAG’s estimated increase from 54% AC operations to 56% AC Operations, led to an increase of **38.5%** in passenger volume. At the Public Scoping meeting, FAA failed to supply any illustrations or data regarding AC operations at BUR (Exhibit 4 - Air Carrier (excel) Exhibit 5 - SCAG Summary

of Airfield Analysis for BUR). Clearly, more and larger, commercial jets will be the most disruptive to our communities. The proposed state-of-the-art Expanded Terminal will increase passenger numbers, thereby multiplying the cumulative impacts on the noise-sensitive hillside communities of Studio City, Sherman Oaks, and Encino, and the protected 4(f) Santa Monica Mountains (Affected Areas).

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\*BUR estimates that the proposed Expanded Terminal will cost \$1.24 billion, significantly increased from the originally estimated \$400 million. To increase revenue, as they must do, BUR will increase capacity by bringing in more passengers in larger jets. Larger, heavier jets will make slower turns, driving the aircraft even further south, thereby contributing to increased future cumulative impacts and danger to the Affected Areas.

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\*Expanded Cargo Facilities will encourage more cargo jets creating heavier, slow-to-gain-altitude jets that are not subject to curfew, thereby flying over noise sensitive areas late at night and early in the morning.

8

\*Expanded General Aviation Facilities will encourage more general aviation aircraft that are not subject to curfew, thereby flying over noise sensitive areas late at night and early in the morning.

9

**Metroplex and Cumulative Impacts:**

\* Proposed Expanded Terminal process must be halted until all cumulative actions taken by FAA/BUR that have already severely impacted Affected Areas are mitigated and alternatives are found.

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\*Previous cumulative actions taken by FAA/BUR that must be considered in combination with the proposed Expanded Terminal include, but are not limited to, the following:

-The current, unauthorized departure procedures implemented in 2017 at same time as Metroplex (Exhibit 6 - Landrum & Brown Final Study);

-Proposed departure procedures OROSZ THREE AND SLAPP TWO (Exhibit 7 - Proposed Procedures OROSZ THREE and SLAPP TWO);

-Skyrocketing passenger and operations growth at both BUR and Van Nuys Airport (VNY) (Exhibit 8- Ian Gregor 40% growth/Los Angeles City Council seeks FAA transparency on Hollywood Burbank Airport);

-Changes in flight path at nearby VNY (Exhibit 9 – Van Nuys Study);

-Impending closure of Santa Monica Airport that has created increased operations at BUR and VNY (Exhibit 10 - Santa Monica Airport will close in 2028 and be replaced by a park, officials say - Los Angeles Times);

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-Increase in helicopter traffic that must fly below the jets from both BUR and VNY, creating a stacking effect.

11

All of the above actions currently contribute to, and will continue to contribute to, increased cumulative impacts on residents, students, local business, film industry, and parklands that are under the narrow, focused flight path.

\*The FAA's Environmental Impact Statement (EIS) must not claim a baseline that includes the currently flown unstudied and undisclosed departure procedures introduced in 2017. To do so would constitute a **false baseline**. To do an accurate comparison, the FAA must use pre-Metroplex conditions as a baseline to compare the impacts that the proposed Expanded Terminal would have on the environment and surrounding communities, in other words, compare the proposed Expanded Terminal impacts to the time period before NextGen was even being considered (2014 or earlier).

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\*It has already been determined by an independent analysis conducted by Landrum & Brown that the BUR flight paths shifted south in a concentrated path over the Affected Areas (See above Exhibit 6 – Landrum & Brown). This change in flight track occurred in early 2017 without notice or environmental study. Prior to 2017, there was only occasional jet noise. Now there is a constant, low, loud jet disruption in our formerly tranquil, hillside neighborhoods. The proposed Expanded Terminal will amplify these impacts that the FAA/BUR has failed to address/mitigate despite intense and widespread public controversy.

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\*BUR proposed procedures, SLAPP TWO and OROSZ THREE, would make permanent the current path that FAA/BUR began vectoring in March 2017, without notice or environmental study, over the Affected Areas, and even exacerbate it by inserting GPS waypoints near schools, in the hearts of the communities of Studio City and Sherman Oaks. BUR has stated that the FAA is planning to do an Environmental Analysis (EA) as a result of extreme public outcry (though we have no independent corroboration from FAA). Such EA is expected to take 12-18 months. The proposed Expanded Terminal must be put on hold NOW and not proceed until the FAA completes its process.

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\*Through its own analysis, VNY reports an increased number of departures by 35% since 2016 (See above Exhibit 9 – Van Nuys Study). It has also moved departure path HARYS TWO south and east (with institution of waypoint PPRRY in May 2018) to traverse the same portion of the Santa Monica Mountains that BUR currently impacts by its departures; and that the proposed departure procedures SLAPP TWO and OROSZ THREE will continue to impact by adding waypoints JAYTE and TEAGN. The proposed Expanded Terminal must not proceed until these paths, already cumulatively impacting Affected Areas, are changed, and alternate paths consistent with Section 175 of the FAA Reauthorization Act and acceptable to the communities in Affected Areas, are explored (Exhibit 11 – BUR 175 Request). Any alternate or dispersed lateral tracks created under Section 175 must be away from the protected Santa Monica Mountains, with the most southern track at the noise corridor of the 101 freeway, consistent with requests by the City of LA.

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\*Both BUR and VNY estimate rapid, increased annual growth, which will contribute significantly to the current air noise over the Affected Areas. The proposed Expanded Terminal will compound these projections (Exhibits 12 BUR Article; Exhibit 13 VNY Article).

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\*Santa Monica Airport (SMO) shortened its runway in 2017 significantly reducing the air traffic out of that airport and causing more traffic to be routed to both VNY and BUR, thereby contributing to the cumulative impacts in the Affected Areas. SMO's complete closure is scheduled to occur in 2028 and will further increase the traffic, along with air and noise pollution, in the Affected Areas (See above Exhibit 10 - Santa LA Times Article).

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### **PUBLIC CONTROVERSY:**

\*The Expanded Terminal has a cumulative, compounding effect on FAA prior actions (the current flight path and proposed procedures) that have been demonstrated to be "highly controversial on environmental grounds" under NEPA Rule 1050 1F 5-2 (10). Highly controversial is defined as "opposition on environmental grounds to an action, by a Federal, state or local government agency, or by a ... a substantial number of the persons affected by such action...." Such opposition occurred during the comment period for the proposed procedures, SLAPP TWO and OROSZ THREE, ending November 18, 2018 as exhibited by the protests of thousands of community members (evidenced by the Petition signed by almost 3,500 people – Exhibits 14A/14B – Flight Path Petition Signatures/Comments); 392,000 noise complaints filed (Exhibit 15 - Airnoise Stats, attached electronically only due to size of file SEPARATE PDF NOT WRAPPED), the opposition of current paths and proposed procedures by elected local, state, and federal officials (Exhibit 16A-16M – Official Letters); the opposition by Burbank Airport itself (Exhibit 17 - Burbank Original Request, and see above Exhibit 11 - Section 175 Request); the over-capacity turnout at the October 18, 2018 Burbank-Glendale-Pasadena Airport Authority meeting, high public turnout at FAA Workshops on November 7/8, 2018; and blanket press coverage, see SCFQS website Press Section at <https://www.studiocityforquietskies.com/copy-of-about>.

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Public Controversy continues during the comment period for BUR Expanded Terminal with high public turnout at the Public Scoping meeting on January 29, 2019, and a Petition opposing the Expanded Terminal, so far signed by more than 1,300 people (Exhibits 18A/18B – Terminal Petition/Comments). Many in the community are writing comment letters. However the FAA is effectively suppressing comments by not providing an email or portal option. To add to the confusion, FAA Federal Register Notice includes a website link for comments that is not actually functioning as such. Furthermore, the instructions to the public were not clear. It is confusing as to whether "submit by" means, "received by" or "postmarked by." We asked BUR to clarify to the public and they never did. Dee Phan of FAA admitted that instructions were unclear (Exhibit 19A - Email Exchange). We have received many comments on our website email and have been asked by the community to deliver them to the FAA. A few comment letters are included here (Exhibit 19B – Sampling of Community Letters). See also community videos, attached electronically only.

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\*Such controversy resulted in the agreement by ALL interested parties to move current path and proposed procedures over 101 freeway, or 101 freeway with dispersal north. Parties include:

- Benedict Hills litigants (Exhibit 20 - Taber Letter);
- Communities Represented by all local Quiet Skies groups;
- Los Angeles City Attorney (See above Exhibits 16A-C – City Attorney Letters) and City Council (Exhibit 21, 21A Resolutions);
- SMMC, MRCA, and other environment groups including Save Coldwater Canyon (SCC), Hillside Federation, and Friends of Griffith Park (Exhibit 22A-22E - Environmental Letters); and
- Burbank Airport (See above Exhibit 11 - 175 Request, Exhibit 17 - Original Request).

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This route would also satisfy FAA stated requirement, revealed in Benedict Hills Settlement, of 3 miles lateral and 1000 feet vertical clearance (Exhibit 23 - Benedict Hills Settlement).

#### **Impacts to Protected Department of Transportation, Section 4(f) Parkland:**

\*Under Section 4(f) of the U.S. Department of Transportation Act, the FAA must avoid potential impacts to "publicly owned parks, recreation areas (including recreational trails), wildlife and water fowl refuges, or public and private historic properties" (23 SFR 774). The FAA is required to look at all other alternatives to avoid overflying 4(f) protected parkland and has failed to do so. The new, more efficient Expanded Terminal must not move forward until the FAA abides by this statutory law and finds alternatives to the cumulative actions already taken by FAA/BUR. Viable alternatives have already been presented to the FAA in a comment letter by the City of Los Angeles, dated November 16, 2018, that the FAA has failed to consider thus far (See above Exhibit 16A-C – City Attorney Letters). The Expanded Terminal will further degrade our public parklands – our quiet refuge from noisy city life. It will negatively impact the already dwindling wildlife and increase fire risk in an area where ingress and egress by emergency vehicles is severely limited. Mountains Recreation & Conservation Authority (MRCA) and Santa Monica Mountains Conservancy (SMMC) consider "quiet to be a critical component of the natural lands visitation experience"(SMMC Letter 1/28/19). The Expanded Terminal combined with other actions taken by FAA/BUR "contribute to a continually increasing level of impacts inconsistent with the recreational and quiet refuge values of the affected natural parklands" (See above Exhibit 22A - SMMC Letter).

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FAA must consult with SMMC/MRCA and all park directors and managers, regarding FAA actions' and proposed action's effects on the parks' ability to provide all of their intended uses, including essential quiet refuge.

#### **Biological Resources:**

FAA must identify, consider, and analyze all potential impacts of Expanded Terminal in the Affected Area – direct, indirect, and cumulative – to wildlife, fish, plants, unique and endangered natural habitats, included in both parklands and natural open space, that are

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essential to viability of wildlife, biodiversity, as well as wildlife corridors and connectivity. Impacts to be analyzed must include noise and air quality. FAA must consult with SMMC/MRCA and all other park directors and managers and jurisdictional government officials, regarding FAA's actions and proposed action's effects on the parks' ability to fulfill all of their intended uses, including that of essential quiet refuge.

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### **Visual Effects**

FAA must identify, consider and analyze all potential impacts of Expanded Terminal in the Affected Area– direct, indirect, and cumulative – to key visual resources in the affected areas. SMMC/MRCA own and manage over a dozen parklands in the affected area on the north face of the Santa Monica Mountains. Parklands include four legislatively established scenic overlooks along the Mulholland Scenic Parkway within the Santa Monica Mountains National Recreation Area. These natural parklands are incompatible with the visual disturbance of constant jet traffic flying at low altitudes overhead. Such use is an inappropriate and incompatible Land Use and further, denies the public the right to use and benefit from their public parklands, purchased with taxpayer dollars (See above Exhibit 22A - SMMC Letter and Exhibit 22B - MRCA Letter). FAA must consult with SMMC/MRCA and all other park directors and managers regarding FAA's actions' and proposed action's, negative impacts or visual effects.

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Appropriate visual surroundings are also essential for enjoyment of cultural and historical resources, including historic structures and neighborhoods, as well as architectural resources. These cultural and historic resources are incompatible with the visual disturbance of constant jet traffic flying at low altitudes overhead. Such use is an inappropriate and incompatible Land Use. FAA must consult with all appropriate jurisdictional managers of these valuable resources regarding potential further negative impacts by Expanded Terminal on the public's enjoyment of these public resources.

### **Water Resources**

FAA must identify, consider and analyze all potential impacts of Expanded Terminal in the Affected Area – direct, indirect, and cumulative – to key water resources in the affected areas. These may include surface waters, groundwater, and wild and scenic rivers, as well as wetlands and floodplains. The affected areas of FAA's actions and proposed action include multiple rivers and streams, lakes, ponds and reservoirs. Surface waters in Fryman Canyon, Dixie Canyon, Oakshire, and Streamview (Laurel Canyon) are affected by constant overflights (Exhibit 24 - WILDLIFE PILOT Study, 24A – Water Map). These impacts will be exacerbated by the Expanded Terminal and air pollution that falls to the ground when aircraft are flying below 3000 feet AGL. FAA must consult with all jurisdictional authorities and managers of these water resources, including SMMC and MRCA, in analyzing such impacts.

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## **Climate**

FAA must identify, consider and analyze all potential impacts of Expanded Terminal in the Affected Area– direct, indirect, and cumulative – on climate, greenhouse gasses, and climate change. Jets create vast amounts carbon pollution, particulates and other toxic substances that are responsible for some portion of climate change. Further, climate change has aircraft operational impacts and pushes jets into new areas (See above Exhibit 6 - Landrum Brown Study). Climate change has a negative impact on general quality of life, wildlife and natural habitats, and exacerbates fire risk.

According to Fortune Magazine (Exhibit 25 - 1/22/19 Fortune Magazine Article), “Air travel adds a significant amount of greenhouse gases into the atmosphere, with nearly 25% of emissions occurring during landing and take-off, according to a 2010 report from NASA.” This is of particular interest to those living, working, studying and visiting affected areas under the path.

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## **Historical, Architectural, Archaeological, and Cultural Resources, Including Historic Neighborhoods and Historic Cultural Monuments:**

FAA must identify, consider and analyze all potential impacts of Expanded Terminal in the Affected Area – direct, indirect, and cumulative – to key Historical, Architectural, Archaeological, and Cultural resources in the affected areas, including historical neighborhoods and Historical Cultural Monuments. For example, one environmentally sensitive Historical Cultural Monument, the “Laurel Terrace Street Trees,” located on Cantura Street in Studio City, between Vantage and Rhodes Avenue” (#1082 on HCM list), lies directly under the flight path. (Exhibit 26 – HCM List of resources) A full list of City of Los Angeles Historic Cultural Monuments may also be found here:

<https://preservation.lacity.org/sites/default/files/HCMDatabase%23040118.pdf>

There are many, state, local, and federal historic properties and neighborhoods in the Affected Area, as well as National Register-Properties and City of Los Angeles Historic Cultural Monuments. The Los Angeles Conservancy also lists historic places on their website: <https://www.laconservancy.org/explore-la/historic-places>

A list of historic resources, prepared by Historic Resources Group, including neighborhoods in the immediate area of overflights may be found here:

[http://preservation.lacity.org/sites/default/files/SO-SC-TL-CP%20Survey%20Report%202.26.13\\_HPLAEdit\\_0.pdf](http://preservation.lacity.org/sites/default/files/SO-SC-TL-CP%20Survey%20Report%202.26.13_HPLAEdit_0.pdf)

FAA must consult with all local, state, and federal agencies in analyzing potential impacts in all study areas.

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## **Noise and Noise Compatible Land Use -- Mountainous Topography Amplifies All Cumulative Impacts:**

\*Hillside/canyon acoustics exacerbate noise. Many of those in the Affected Areas live in the Santa Monica Mountain range and foothills at elevations of 800 to well over 1000 feet, thereby making aircrafts' effective Above Ground Level (AGL) altitude lower than if overflying flat land. Noise concentrates in bowl-like canyons and sustains and bounces off mountains in all directions, creating more noise for everyone, even spilling and deflecting to neighborhoods outside the immediate hillside area. The FAA/BUR has failed to consider this aggravating circumstance when taking previously cumulative actions to re-route low-flying jets over this type of terrain and must consider, study, and measure the unique topography when considering how the Expanded Terminal will further amplify already devastating cumulative noise impacts.

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\*FAA has not actually studied and measured hillside acoustics in affected communities. Noise must be measured not modeled. Any EIS addressing cumulative impacts of Replacement Terminal must include **actual** noise measurements, including Single Event measurement, in all regions of the affected area, i.e. under the footprint of current and proposed departure procedure and wind arrival paths. Noise measurement must be capable of considering topographical effects of sustained reverberation/echo, and bounce. Noise metric must account for both high frequencies (dB A) and low frequencies (dB B) and measure accurately – including both the high-pitched whines of private jets and the super low, visceral reverberations through the canyons. Pilots exit the airport and fly flat, gaining altitude slowly until, nearing terrain, and then gun the engines over the Affected Areas to gain speed. Actual noise measurement in the Affected Areas must be part of any EIS for the proposed Expanded Terminal.

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### **Wind and Weather Impacts – Mountainous Topography**

\*Wind and weather paths are increasingly becoming the norm. Wind Day Paths bring arrivals over affected communities instead of departures (Exhibit 27A-C – Southern Wind Day Arrivals). Extremely low landing altitudes over terrain with many obstacles increase danger to aircraft and passengers as well as to those on the ground. Significant health risks are magnified. The efficiency of the state-of-the-art Expanded Terminal will increase the frequency of low altitude arrivals and contribute to an already dangerous action taken by FAA/BUR.

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### **Safety Impacts – Mountainous Topography:**

\*Increasingly, simultaneous departures and arrivals (Exhibit 28A and 28B - Webtrak), often within 1,200 feet of each other, are occurring over mountainous terrain (Exhibit 28C – Webtrak). This practice contributes to and significantly worsens the dangerous cumulative safety impacts and the welfare of our communities. The new, more efficient Expanded Terminal will increase this phenomenon. It will also increase the sheer number and frequency of aircraft traversing the mountains at lower altitudes, thereby compounding the probability that a crash will occur over dry parkland, creating catastrophic urban wildfires that will spread through the Santa Monica Mountains (Exhibit 28D – Webtrak Aircraft Over Mountainous Topography). Lack of ingress and egress

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through the terrain make it impossible for emergency vehicles to pass. This is exceedingly reckless and constitutes a dereliction of the FAA's obligation to society. ] 30

**Health Impacts of Noise and Degraded Air Quality:**

\*The new, more efficient Expanded Terminal will increase the already burdensome cumulative negative health effects from constant, low-flying jets over elevated terrain that degrade air quality and cause serious health problems: ] 31

-Health effects of jet pollution are severe. Jet fuel emissions are a toxic stew of benzene and hazardous chemicals. At or below 3,000 feet (mixing level), particulates fall to the ground rather than being absorbed in the atmosphere. Fine particulate emissions are dangerous and cause respiratory disease, heart disease and cancer. Children and the elderly are "sensitive receptors" and are most susceptible. Air quality degradation will be increased, threatening the health of residents, students, and visitors. The greater the volume and frequency of jet overflights, the greater the pollution, and the greater the cumulative health risk (Exhibit 29 - Health Effects - Time magazine/How Loud Noise Exposure is Linked to Heart Disease 2/6/2018; Exhibit 30 - Health Effects -- Sonic doom\_ how noise pollution kills thousands each year \_ Life and style \_ The Guardian).

-Health effects of noise are severe. According to the World Health Organization and a Columbia University study, noise has been proven to cause heart and lung disease, strokes and even reduce longevity (Exhibit 31-Health Effects WHO Europe Press Release noise guidelines for Europe released; Exhibit 32 - Health Effects Lawmaker Urges LaGuardia Flight Path Changes - WSJ). The greater the volume and frequency of jet over flights, the greater the cumulative health risk. ] 32

-Noise increases disruption in schools and interferes with students' ability to learn (Exhibit 33 - Air pollution linked to "huge" reduction in Intelligence; Exhibit 34 - Business Insider Article - Air pollution leads test scores to drop over time\_ study). Hillside schools are not designed to be under a flight path. They were not built near an airport or freeway and therefore do not have soundproofing, triple paned windows, or air filtration. Flight frequency due to the higher efficiency of the proposed Expanded Terminal will increase cumulative impacts already suffered by our children as a result of previous actions taken by FAA/BUR.

\*Any EIS addressing cumulative impacts of Replacement Terminal must include actual testing of air quality in all regions of the Affected Area; under the footprint of current and proposed departure procedure and wind arrival paths.

**Economic Impacts:**

\*The new, more efficient Expanded Terminal will increase the economic loss already experienced in the Affected Areas. ] 33

-Negative effects on local businesses and restaurants will increase. ] 34

-The film industry centered in Studio City is already disappearing due to current unauthorized flight paths that a New Terminal would exacerbate. TV and film shoots in Studio City and Sherman Oaks - a critical part of our local economy, with CBS Television Studios a huge contributor of jobs and local tax revenues - would be severely affected by the Expanded Terminal. Crews already have to "hold a shot" every 90 seconds as a flight passes due to other cumulative actions already taken by FAA/BUR. Many on-location shoots are simply moving elsewhere due to the constant noise (Exhibit 35A-35C - Letters from Community in Film Industry).

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-Home values have already been impacted and are on the decline. Research shows living under a flight path may reduce a home's value up to 29% (Exhibit 36 - The Impact of Airport Noise on Residential Real Estate By Randall Bell, MAI; July 2001).

Cumulatively, this in turn, causes a massive reduction in tax revenues to the City of Los Angeles.

**Construction Environmental Impacts:**

\*Residents near BUR and along the soil export route have grave concerns about vast amounts of contaminated soils traversing their neighborhoods, potentially exposing them to dangerous materials. Residents near BUR also have concerns about the growth of the airport, as well as increased traffic surrounding the airport, and air pollution from traffic.

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**Mitigation:**

\*Based on prior actions taken by FAA/BUR, mitigation of harm must be implemented before plans for the proposed terminal can continue. The damaging and unreasonable cumulative impacts resulting from BUR/FAA action, as evidenced by widespread public controversy, must be addressed and resolved. Meanwhile, all plans for the proposed Expanded Terminal must immediately cease.

36

-FAA must address and consider request from BUR to use Section 175 of the FAA Reauthorization Act to create dispersed lateral tracks away from the 4(f) protected Santa Monica Mountains. Use of Section 175 has the support of the City of Los Angeles through its Resolution dated 2/27/19 (See above Exhibit 21A - Resolution). All aircraft are capable of making early turn 15 seconds sooner so that turn is made over noise corridor of the freeway (See Exhibits 37A-37D - Tight Turns).

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-FAA must thoroughly analyze all possible departure routes, in all directions, even if some route require design modification. This must be determined before final design of Replacement Terminal or any further design or construction.

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-FAA must consider moving waypoints to the 101 freeway, which would satisfy the requests of Benedict Hills litigants; Communities Represented by all local Quiet Skies groups; Los Angeles City Attorney and City Council; SMMC, MRCA, and other environment groups including Save Coldwater Canyon (SCC), Hillside Federation, and Friends of Griffith

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Park; and Burbank Airport, as well as meet FAA’s safety standard of 3 miles lateral and 1000 feet vertical separation from arrivals runway 8, as stated in Benedict Hills Settlement (See all Exhibits 14-23 listed in Public Controversy section above). 39

-FAA must consider a full "reset" of BUR path to the historical dispersed path as written but not currently flown.

**Alternatives:**

Other alternatives must be considered such as:

- 40
 \*Replacement Passenger Terminal in Southwest Quadrant to allow for more efficient departures to East and North.
- 41
 \*Redesign/Airfield Configuration: Modify and regrade the 15/33 Runway so it can be regularly used for northern takeoffs. BUR has stated that Northern takeoffs are impossible in windless conditions. We have evidence of Northern takeoffs in calm weather situations (Exhibits 38A-38E – Webtrak).
- 42
 \*Redesign/Airfield Configuration: Create New Departure Procedures considering a dedicated Runway for Southwest Airlines, Burbank’s largest carrier, to depart to the north. BUR has stated that Northern takeoffs are impossible in windless conditions. We have evidence of Northern takeoffs in calm weather situations (See above Exhibits 38A-38E – Webtrak).
- 43
 \*Redesign/Airfield Configuration: Create New Departure Procedures to accommodate departures on other runways, in other directions to reduce southwestern departures (Exhibit 39 - Procedure for LESS CAPABLE Aircraft/Metroplex Map 2016).
- 44
 \*Redesign: Create New “Wind” Arrival Procedures to provide alternatives to unsafe practice of descending over mountainous terrain. We have Webtrak evidence in wind conditions of aircraft both departing and arriving in the north (Exhibit 40A-40D – Webtrak).
- 45
 \*Redesign: Create alternate procedures for some “less competent jets” that can’t always complete their turns prior to the 101 freeway. Use the arrival runway 8 to head east or straight out west (See above Exhibit 39 - Procedure for LESS CAPABLE Aircraft/Metroplex Map 2016).
- 46
 \*Restore the pre-Nextgen, historical 6-mile wide flight path, proven safe for decades. This track is still written in the Federal Register but is not flown the way it is written (Exhibit 41 – BUR Existing Procedures).
- 47
 \*Develop procedures to achieve rapid vertical gain (optimized climb profile), such as in use by John Wayne Airport for noise abatement. Jets ascend rapidly and turn. Such procedures would minimize affected area by accomplishing turns to north and east in the

[ vicinity of the airport, rather than in the protected Santa Monica Mountains. According to JWA, “airlines are required to meet noise limits, but how those limits are achieved is up to them” (Exhibit 42 – JWA Vertical Gain Procedures). ] 47

[ \*Reroute the flights east or southeast over Burbank, Glendale, and Pasadena. They are reaping the profits from the airport but are not sharing in ANY of the air noise and pollution. Los Angeles receives all the negative impacts with no reward or profit (See Exhibit 16H - Congressman Sherman’s Letter). ] 48

[ \*Create alternate tracks in ALL directions. There is webtrak evidence of numerous successful northern departures by all jets (See Exhibits 38A-38C - Webtrak), as well as eastern departures (Exhibit 38F -Webtrak). ] 49

[ \*Transfer or shift some of the General Aviation or Cargo operations to another existing public airport (or airports) in Southern California. ] 50

[ \*Retire all General Aviation operations. The Expanded Terminal will encourage more General Aviation including large jets that are not subject to BUR's voluntary curfew, and will therefore fly over noise-sensitive areas late at night and early in the morning. ] 51

[ \*Retire or reduce Cargo operations. The Expanded Terminal will encourage more cargo and heavier, slow-to-gain-altitude jets that are not subject to curfew, and will therefore fly over noise-sensitive areas late at night and early in the morning. ] 52

[ \*Relocate the airport to a less populated area. The Expanded Terminal will have Metrolink connections to Antelope Valley and Ventura. These high-speed rail lines are two-way. A New Airport designed to meet all FAA standards could be located on the other end of either line in a less densely populated area. ] 53

**SUBMITTED BY:**

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**STUDIO CITY FOR QUIET SKIES**

## **List of Exhibits**

Exhibit 00 and 0 – Future, foreseeable capacity -heavier jets; Webtrak of 767 1/1/19

Exhibit 1 - Scoping enplanement projections;

Exhibit 2 – Excel Growth/Enplanements 31% increase

Exhibit 3 - LA Curbed Article 2/7/19

Exhibit 4 - Air Carrier (excel) ops up 25%, are 56.4% of all ops;

Exhibit 5 - SCAG Summary of Airfield Analysis for BUR

Exhibit 6 - Landrum & Brown Study

Exhibit 7 - Proposed Procedures

Exhibit 8 - Ian Gregor 40% growth/Los Angeles City Council seeks FAA transparency on Hollywood Burbank Airport

Exhibit 9 – Van Nuys Airport Study

Exhibit 10 – LA Times Santa Monica Airport will close in 2028

Exhibit 11 – BUR Section 175 Letter

Exhibit 12 – LA Times BUR closes out 2018 highest passenger count

Exhibit 13 – Growth takes off at VNY

Exhibit 14 – Petition re Change Path

Exhibit 15 – Petition Comments re Change Path

Exhibit 16A – City Attorney Letter to FAA

Exhibit 16B – City Attorney November 18 Letter to FAA

Exhibit 16C – City Comment letter August 2018 to FAA

Exhibit 16D – Councilmember Krekorian Letter to FAA

Exhibit 16E – Councilmember Krekorian/City Extension Letter to FAA

Exhibit 16F – Councilmember Ryu Letter to FAA

Exhibit 16G - Councilmember Ryu Letter

Exhibit 16H – Congressman Sherman Letter November 2018 to FAA

Exhibit 16I – Congressman Sherman Letter August 2018 to FAA

Exhibit 16J – State Senator Hertzberg Letter to FAA

Exhibit 16K – Assemblyman Nazarian Letter to FAA

Exhibit 16L – City of LA FAA FOIA Appeal and Supplemental Comments

Exhibit 16M – Studio City Neighborhood Council Letter to FAA

Exhibit 17 – BUR Letter to FAA re Move Path

Exhibit 18A – Petition re Terminal Comments

Exhibit 18B – Petition re Terminal Signatures

Exhibit 19A – Email Exchange with Dee Phan of FAA

Exhibit 19B – Sampling of Community Letters

Exhibit 20 – Taber Comment Letter

Exhibit 21A– City Resolution re Section 175

Exhibit 21B – City Resolution Opposing Flight Path

Exhibit 22A – SMMC Letter to FAA

Exhibit 22B – MRCA Letter to FAA

Exhibit 22C – Nazarian/Krekorian Letter to SMMC/MRCA

Exhibit 22D – Save Coldwater Canyon Letter to FAA

Exhibit 22E – Hillside Federation Letter to FAA

Exhibit 22F – Friends of Griffith Park Letter to FAA

Exhibit 23 – Benedict Hills Settlement Agreement

Exhibit 24 – Wildlife Pilot Study

Exhibit 24A – Map of Bodies of Water in Santa Monica Mountains

Exhibit 25 – Fortune Magazine Climate Change Article

Exhibit 26 - Historic Cultural Monuments List

Exhibit 27A – Wind Days – Northern Departures Rapid Vertical Gain

Exhibit 27B – Wind Day Arrivals Over Mountains

Exhibit 27C – Wind Day Arrivals Over Mountains

Exhibit 28A – Simultaneous Departures/Arrivals Over Mountains

Exhibit 28B – Simultaneous Departures/Arrivals Over Mountains

Exhibit 28C – Departures and Arrivals – No Separation over Mountains

Exhibit 28D – Webtrak Aircraft Over Mountainous Topography

Exhibit 29 – Time Magazine – Health Effects of Loud Noise and Heart Disease

Exhibit 30 – The Guardian – Health Effects Sonic Boom Noise

Exhibit 31 – Who Europe – Health Effects Noise Guidelines

Exhibit 32 – Wall Street Journal – Lawmaker Urges Flight Path Change

Exhibit 33 – Modern Diplomacy – Learning – Air Pollution Reduces Intelligence

Exhibit 34 – Business Insider - Learning – Air Pollution Drop in Test Scores

Exhibit 35A – Film Industry Letter (Stein/McGuire)

Exhibit 35B – Film Industry Letter (Crosswaite)

Exhibit 36 – Airport Noise and Real Estate

Exhibit 37A – Tight Turns SWA and UPS

Exhibit 37B - Tight Turns FedEx and Alaska Airlines

Exhibit 37C - Tight Turns AMF and FedEx

Exhibit 37D - Tight Turns AMF, SKW, and FedEx

Exhibit 38A – Northern Departure Calm Conditions

Exhibit 38B - Northern Departure Calm Conditions

Exhibit 38C - Northern Departure Calm Conditions

Exhibit 38D - Northern Departure Calm Conditions

Exhibit 38E - Northern Departure Calm Conditions SWA, SWA, JSX

Exhibit 38F – Eastern Departures

Exhibit 39 – East West Procedure for Less Capable Aircraft

Exhibit 40A - Northern Arrivals and Departures

Exhibit 40B - Northern Arrivals and Departures

Exhibit 40C - Northern Arrivals and Departures

Exhibit 40D – Northern Arrivals and Departures

Exhibit 41 – BUR Existing Procedures Appendix A

Exhibit 42 – Vertical Climb

**The attachments to this letter are available upon request**

**C. COMMENT LETTER #2**



# STUDIO CITY FOR QUIET SKIES

**FEBRUARY 28, 2019**

## **OFFICIAL COMMENTS RE CEQA/FEIR UNDERLYING BURBANK'S NEW EXPANDED TERMINAL**

### **COMMENT TWO OF TWO COMMENTS**

#### **Outdated CEQA Environmental Report Requires Repeat Study or Revision:**

The outdated CEQA FEIR, certified by the Authority on 6/28/16, does not reflect substantial changes in operations and FAA actions made since its certification. FAA must not rely on any data or finding within the FEIR in preparing an EIS. Therefore, the FEIR should be repeated or revised. For reference, please see Burbank documents at <https://burreplacementterminal.com/documents/>.

#### **California Environmental Quality Act (CEQA) Prepared PRIOR to the Following Changes:**

*-2017 NextGen changes in flight path:* FEIR Appendix K states, "Since April 2013 Part 150 Study, flight tracks have not changed. No option would have effect on flight tracks" (K-3). However, in early 2017 BUR's departure flight path did indeed change, shifting south, newly impacting thousands of people without notice or study. Since then, all departing jets overfly Santa Monica Mountain communities, close to 200 times daily with 95%+ of all aircraft now passing through the south gate (See Studio City For Quiet Skies Main Terminal Comment One "Comment One" – Exhibit 6 - Landrum and Brown Study). The FAA admitted that the hillside communities of Studio City, Sherman Oaks, and Encino, and the protected 4(f) Santa Monica Mountains "Affected Areas" under the new flight path have not been studied (Attached To This Comment "Comment Two" Exhibit 1 – FAA Statement in Daily News Article).

*-Other damaging cumulative impacts:* Due to actions taken by the FAA, more cumulative impacts to the Affected Areas occurred that were not included in the 2016 FEIR. Such

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impacts include: lower altitudes from NextGen procedures; change in Van Nuys flight departures path – moving departures south and east to travel the same path as BUR, but in the opposite direction (Comment One Exhibit 9 – VNY Study); 15% annual growth at VNY; impending closure and runway shortening at SMO driving more jets to both BUR and VNY (Comment One Exhibit 10 – SMO Closure).

*-BUR changes in fleet:* BUR has made many changes in their fleet, resulting in an increased number of larger, heavier jets. For example, in November 2018 Executive Director Frank Miller reported that BUR replaced smaller 50 seat RJ50 regional jets with 145 seat 737s (<https://youtu.be/1iYTyk2WiAg> at 1:27:24). Therefore, the claim that the fleet mix will be “identical” in the future is false (Comment Two Exhibit 2 - Flight Path and Fleet Mix)

*-Tremendous increase in passenger growth:* Since 2016, Burbank Airport “enplanements” and total passengers have increased by 31%. (Comment One Exhibit 2 – Enplanements up 31%) Projections included in the CEQA study are unrealistic and do not reflect recent growth and some have already been surpassed. FEIR estimates of operations are much lower than FAA’s projections presented in the scoping meeting – even while FAA’s projections represent far a smaller increase than we are experiencing now (Comment Two Exhibit 3 – Operations Growth). (Comment Two Exhibit 4 – CEQA Terminal Operations Projections) In addition, statistics from BUR airport prove that the largest and most disruptive category of aircraft, Air Carriers and Air Taxis, have grown by 25% in the last 3 years. In additions, Enplanements are up 31% in 3 years. If Enplanements (passengers) were to continue growing at the current rate of 11.07% annually, for a total of 5.2 million passengers -- then by 2029 enplanements would be 4.5 million, and a total of 9 million passengers.

*-SCAG analysis (dramatic changes in projections):* Southern California Association of Governments (SCAG) Regional Aviation Aircrafts Analysis of Airport Capacity Constraints Technical Memorandum presented the following scenario: Currently Burbank’s operations mix, combined Air Carrier and Air Taxi, is at 58% -- higher than the highest projections from the SCAG 2015 study, surpassing the most aggressive scenario, depicted in Table 19 below, of 10,794,000 – 11,8177,000 passengers annually (Comment One Exhibit 5 – SCAG).

**Maximum Annual Passenger Volume**

The annual passenger volume was estimated from the range of ASV as shown in **Table 19**. Three scenarios were considered:

- Scenario 1: The mix of operations for air carriers and air taxi assumes the historical annual pattern in 2013 (see Figures 16 and 17). i.e. 50 percent commercial operations. The average passenger per aircraft was based on the historical average seat capacity and load factor for each category of carriers (see Table 18).
- Scenario 2: The mix of operations for air carriers and air taxi carriers follows the highest monthly percentage for commercial operations (see Figure 18). i.e. 54 percent commercial operations. The average passenger per aircraft is the same as Scenario 1.
- Scenario 3: The mix of operations for commercial and commuter carriers adopts the 2032 forecast operations from the Airport Planning Forecast given in Appendix F of the BUR 14 CFR part 150 Study Noise Exposure Map Update, April 2013. i.e. 56 percent commercial operations. The load factor was increased to 85 percent. This represents the high scenario.

**Table 19: Summary of Airfield Analysis for BUR – Estimated Annual Passenger Volume**

		Scenario 1	Scenario 2	Scenario 3
Mix of Operations	Air Carrier	38.00%	40.50%	46.00%
	Air Taxi	12.00%	13.50%	10.00%
	Total Commercial	50.00%	54.00%	56.00%
Average Passengers per Operations	Air Carrier	95	95	116
	Air Taxi	9	9	17
Estimated Maximum Annual Passengers	FAA Study (50 operations per hour)	7,299,000	7,792,000	10,794,000
	FAA Study (55 operations per hour)	8,032,000	8,574,000	11,877,000
Estimated Maximum Annual Passenger Volume		Estimated Airfield Capacity: 7.3 to 11.9 MAP		

Source: Burbank Bob Hope Airport, <http://www.burbankairport.com/home/about-airport/abouttheairport.html>; Meeting with BUR, October 2014; and AECOM analysis.

<sup>21</sup> Meeting with BUR, October 2014.



The 2016 FEIR does not reflect any of these significant changes, thereby rendering it flawed, and thus no longer relevant. A new CEQA study must be completed that takes into account these cumulative impacts.

In addition, there are multiple serious omissions in the DEIR and FEIR. The area studied does not include the Affected Areas under the 2017 flight path change. There is no consideration of the current and future impacts to the biological resources, health, safety, noise, Section 4(f) parklands, historic and cultural monuments and neighborhoods; water resources and land use, in Affected Areas.

**Measure B/Joint Power Agreement (CEQA Requirement):**

In 2015, after decades of conflict between the Authority and the City of Burbank, the two parties developed a Conceptual Term Sheet for a replacement passenger terminal that stipulated the following:

- The Authority would receive a vested right to build a replacement passenger terminal on an airport-zoned property, including the proposed former Lockheed B-6 Plant site.
- The City of Burbank would receive certain governance protections to be created and documented in a Joint Power Agreement (JPA) governing the Authority.
- A California Environmental Quality Act (CEQA) analysis must be completed by the Authority for the replacement passenger terminal.

The Authority prepared an EIR for the replacement passenger terminal and ancillary projects to comply with the requirements of CEQA and the JPA and issued a Notice of Determination certifying the EIR in July 2016. On October 28, 2016, Frank R. Miller, executive director of the Airport, sought assurances from the FAA, that there would be no increase in departures to the east over Glendale/Pasadena if the existing terminal were removed. On October 31, 2016, he was assured by Glen A. Martin of the FAA, that the “restriction would remain if the existing terminal was removed” (Comment Two Exhibit 5A and 5B – F. Miller letter page 1 and 2; Comment Two Exhibit 6 – G. Martin FAA letter). The Agreement provided further protections for the City of Burbank via new rules that gave the Burbank Commissioners “supermajority” voting rights so that they could control the future of the Airport (Comment Two Exhibit 7- Joint Powers Agreement; Comment Two Exhibit 8 – The Agreement). Thus, the City of Burbank secured assurances that their voters would be protected from jet noise and pollution and Measure B passed in favor of the replacement passenger terminal by roughly 70 percent. With the passage of Measure B, the provisions contained in the JPA between the Authority and the City of Burbank became effective.

\*For additional background information, refer to FAA Replacement Terminal Project Background and EIS Process: <https://bobhopeairporteis.com/about/background-eis-process/>

**Opportunity for Self-Dealing:**

The Burbank-Glendale-Pasadena Airport Authority (Authority or Airport Sponsor) prepared the EIR and certified the EIR, with no oversight other than from the cities that share in Airport profits. As the Lead Agency on the project, the Airport Authority can determine that the needs of the proposed project outweigh detrimental adverse environmental effects. Is the Burbank Airport Authority allowed to be the judge, jury and executioner for Los Angeles’ protected parkland and wildlife preserves?

**No Protections For Los Angeles:**

Measure B was on the ballot in November 2016 and passed with **20,110 Burbank voters** in favor of the measure. Los Angeles did not get to vote, however hundreds of thousands of LA residents are negatively affected by Burbank Airport’s noise and pollution. **The expansion will make it worse.** (Comment Two Exhibit 9 – Hollywood Burbank Airport Closes out 2018...)

There are no protections for residents of Los Angeles even though Los Angeles is the chief recipient of Burbank Airport’s exported noise and pollution. BUR extends into Los Angeles

on two sides. Air traffic traverses only a small portion of the City of Burbank, and for a very short distance, right after takeoff and just before arrival. The remainder of the time, Burbank's almost 400 low departures and arrivals occur over Los Angeles.

**Governing State Law:**

**Under California State law, the EIR should be repeated or a supplemental report should be required.**

*State of California PUBLIC RESOURCES CODE Section 21166: When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:*

*(a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.*

*(b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.*

*(c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.*

*(Amended by Stats. 1977, Ch. 1200.)*

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SUBMITTED BY:

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**STUDIO CITY FOR QUIET SKIES**

**The attachments to this letter are available upon request**

## **D. RESPONSES TO COMMENT LETTERS**

1. The Proposed Action will not increase the number or change the type of aircraft operating at the Airport, nor does it propose to change any airspace procedures. A discussion of the changes in air pollutant emissions resulting from the Proposed Action will be provided in the Air Quality section in Chapter 4 of the Draft EIS. In addition, a discussion of any potential changes in the noise environment will be provided in the Noise and Noise-Compatible Land Use section in Chapter 4 of the Draft EIS. A list of cumulative projects will be developed and presented in Chapter 3 of the Draft EIS and analyzed in the Cumulative Impacts section in Chapter 4 of the Draft EIS.
2. NEPA requires a discussion of the affected environment, or the environment of the area(s) to be affected or created by the alternatives under consideration (see 40 CFR 1502.15). Two study areas will be identified for use in describing existing conditions in the Airport area and evaluating the potential impacts of the Proposed Action and any reasonable alternatives. These two areas—identified as the Detailed Study Area and the General Study Area—will be described and illustrated in the Affected Environment chapter of the Draft EIS.
3. The square footage of the proposed replacement passenger terminal building is greater than the square footage of the existing passenger terminal building; however, the replacement passenger terminal building is proposed to have the same number of aircraft gates that are at the existing passenger terminal building.

In the cumulative impact analysis for the Draft EIS, the FAA will include past, present, and reasonably foreseeable actions in the project study area.

4. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace.

Forecasted growth at the Airport will be presented in the Purpose and Need chapter of the Draft EIS.

5. The Authority and the City of Burbank developed a Conceptual Term Sheet in 2015 for a replacement passenger terminal that stipulated the following:
  - The Authority would receive a vested right to build a 14-gate replacement passenger terminal on an airport-zoned property, including the proposed former Lockheed B-6 Plant site.

- The City of Burbank would receive certain governance protections to be created and documented in a Joint Power Agreement (JPA) governing the Authority.
- A California Environmental Quality Act (CEQA) analysis must be completed by the Authority for the replacement passenger terminal.

City of Burbank citizens then voted on the replacement passenger terminal, as required by Measure B, in the November 2016 election. Measure B passed in favor of the replacement passenger terminal by roughly 70 percent. Thus, the Proposed Action is for a 14-gate replacement terminal. If the Authority wanted to add more aircraft gates in the future, a change to the Conceptual Term Sheet would be required. Any change to the Conceptual Term Sheet would require coordination between the Authority and City of Burbank, as well as a vote from City of Burbank residents.

A discussion of what is included in the Proposed Action will be provided in the Alternatives chapter of the Draft EIS.

6. The Proposed Action would not increase the operational capacity of the airfield at the Airport or affect the inherent annual service volume of the Airport. The growth in enplanements has been occurring with the existing terminal and is not related to the potential for a replacement terminal. The ability of the Airport to accommodate air carrier, cargo, military, and general aviation operations is a function of the number and configuration of the runway system, and air traffic operational procedures and supporting navigational aids. Growth in the number of aircraft operations at the Airport would be the result of the demand of the flying public and efforts by the airlines to accommodate this growth, as well as other factors independent to the replacement terminal. This growth is reflected in the FAA-approved Terminal Area Forecast (TAF), which will be used as the basis for the future number of aircraft operations at the Airport and utilized for the analysis in this EIS. The potential impacts of the Proposed Action as compared to the No Action Alternative will be analyzed and disclosed in this EIS as required by NEPA.
7. The Proposed Action would not increase the operational capacity of the airfield at the Airport or affect the inherent annual service volume (i.e., enplanements) of the Airport. The ability of the Airport to accommodate air carrier, cargo, military, and general aviation operations is a function of the number and configuration of the runway system, and air traffic operational procedures and supporting navigational aids. The Proposed Action does not change the number or configuration of the runway system. Jet size is constrained by the length and configuration of the runways which will not change. Growth in the number of

aircraft operations at the Airport would be the result of the demand of the flying public and efforts by the airlines to accommodate this growth, as well as other factors independent to the replacement terminal. This growth is reflected in the FAA-approved TAF, which will be used as the basis for the future number of aircraft operations at the Airport and utilized for the analysis in this EIS. The potential environmental impacts of the Proposed Action as compared to the No Action Alternative will be analyzed and disclosed in this EIS as required by NEPA.

8. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace. A discussion of any potential changes in the noise environment will be provided in the Noise and Noise-Compatible Land Use section in Chapter 4 of the Draft EIS. The Proposed Action includes the construction of an 8,000-square-foot replacement airline cargo building, the construction of an 8,000-square-foot ground support equipment (GSE) and passenger terminal maintenance building, and the demolition of a 16,000-square-foot airline cargo and GSE maintenance building. Thus, no expansion of airline cargo facilities is included as part of the Proposed Action.
9. The Proposed Action does not include construction of any new general aviation facilities. The relocation of the Aircraft Rescue and Firefighting (ARFF) facility from the hangar in the northwest quadrant of the Airport to a new ARFF facility in the northeast quadrant would allow the hangar in the northwest quadrant to become available for general aviation uses. The FAA does not have the authority to direct or place influence upon general aviation (GA) aircraft operators to shift their activity and services from one airport to another or to operate at specific times of the day. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the general aviation fleet that operates at the Airport or any other public use airport.

The Proposed Replacement Terminal Project would not result in changes to the Airport's runway configuration, timing of operations, or airspace. Additionally, the Proposed Replacement Terminal Project is not expected to result in changes to the aircraft fleet mix because the type of aircraft operating at the Airport is limited by the length of the runways, not the size of the terminal. No change in the length of either runway at the Airport is proposed as part of the project. Finally, the GA jets do not use the terminal for their operations, the enplanement of pilots and their guests, or the loading of cargo. Therefore, the type of general aviation aircraft that would operate at the Airport in the future would be the same as the type of aircraft that operate at the Airport today.

10. A list of cumulative projects will be developed and presented in Chapter 3 of the Draft EIS and analyzed in the Cumulative Impacts section in Chapter 4 of the Draft EIS.
11. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace.

A list of cumulative projects will be developed and presented in Chapter 3 of the Draft EIS and analyzed in the Cumulative Impacts section in Chapter 4 of the Draft EIS.

12. The Draft EIS will analyze and disclose the potential environmental impacts resulting from the proposed replacement passenger terminal project (Proposed Action) at the Bob Hope "Hollywood Burbank" Airport (Airport) and will discuss them in Environmental Consequences chapter of the Draft EIS. This analysis will include various impact categories of concern expressed in the scoping comments such as air quality, noise, socioeconomic impacts, children's health, etc. However, the purpose of the EIS is not to address existing conditions at the Airport, but to evaluate the future conditions that would result when comparing the Proposed Action and any reasonable alternatives to the No Action Alternative. The Proposed Action will not result in changes to the Airport's runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace. In addition, the Proposed Action would have no effect on the number of aircraft operations or destinations served by airlines.
13. The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The two projects are not connected actions. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).

For this EIS, the Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace.

A discussion of any potential changes in the noise environment using FAA-approved noise metrics for California (CNEL) will be provided in the Noise and Noise-Compatible Land Use section of the Environmental Consequences and Mitigation Measures chapter in the Draft EIS.

14. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The two projects are not connected actions. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For further information on the EA for airspace please go to the following link:  
[https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).
15. Because the Proposed Action would not result in changes to the Airport's runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace, addressing the use of Section 175 of the FAA Reauthorization Act is not appropriate for this EIS.
16. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace. The Terminal Area Forecast (TAF) is the official FAA forecast of aviation activity for U.S. airports. The TAF contains historical and forecast data for enplanements, airport operations, Terminal Radar Approach Control (TRACON) operations, and based aircraft.

The TAF assumes a demand driven forecast for aviation services based upon local and national economic conditions as well as conditions within the aviation industry. In other words, an airport's TAF forecast is developed independent of the ability of the airport and air traffic control system to furnish the capacity required to meet demand. The growth in enplanements at the Airport occurring under the existing and forecasted conditions is not affected by the potential for a replacement passenger terminal building.

A discussion of any potential changes in the noise environment using FAA-approved noise metrics for California (CNEL) will be provided in the Noise and Noise-Compatible Land Use section of the Environmental Consequences and Mitigation Measures chapter in the Draft EIS.

17. In the cumulative impact analysis for the Draft EIS, the FAA will include past, present, and reasonably foreseeable actions. The shortening of the runway at SMO is not within the General Study Area identified in Chapter 3 of the Draft EIS. Therefore, the shortening of the runway at SMO as a cumulative project is not within the scope of this EIS. A discussion of cumulative impacts will be included in the Environmental Consequences and Mitigation Measures chapter of the Draft EIS.

18. A list of cumulative projects will be developed and presented in Chapter 3 of the Draft EIS and analyzed in the Cumulative Impacts section in Chapter 4 of the Draft EIS.

The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).

19. Comment noted.
20. The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).
21. The Proposed Action would occur on-Airport property and not result in a direct effect to the Santa Monica Mountains Recreation Area. A discussion of the impacts to recreational areas will be provided in the Section 4(f) section of the Environmental Consequences and Mitigation Measures chapter of the Draft EIS. In addition, a discussion of any potential changes in the noise environment will be provided in the Noise and Noise-Compatible Land Use section of the Environmental Consequences and Mitigation Measures chapter of the Draft EIS.
22. An analysis of potential impacts to biological resources as a result of the Proposed Action as compared to the No Action Alternative will be included in the Biological Resources section in Chapter 4 of the Draft EIS. In addition, a discussion of the impacts to Section 4(f) resources will be provided in the Section 4(f), Noise, and Air Quality sections in Chapter 4 of the Draft EIS.
23. An analysis of visual effects, Section 4(f), noise, and air quality impacts within the Detailed Study Area will be included in the Visual Effects, Section 4(f), Noise, and Air Quality sections in Chapter 4 of the Draft EIS. The impacts to 4(f) resources, including parks and historic structures eligible for the National Register, will be evaluated.

24. An analysis of water resources impacts within the Detailed Study Area will be included in the Water Resources section in Chapter 4 of the Draft EIS.
25. An analysis of potential impacts associated with climate will be included in the Climate section in Chapter 4 of the Draft EIS.
26. An analysis of the impacts to historic resources within the General Study Area will be included in the Historical, Architectural, Archeological, and Cultural Resources section of the Draft EIS. Additionally, the FAA is required to consult with the State Historic Preservation Officer, as well as relevant Tribal Historic Preservation Officers, for impacts to resources eligible for listing in the National Register of Historic Places prior to affecting such resources. Consultation efforts will be presented in the Draft EIS.
27. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace.

A discussion of any potential changes in the noise environment using FAA-approved noise metrics for California (CNEL) will be provided in the Noise and Noise-Compatible Land Use section of Chapter 4 in the Draft EIS.

Additionally, the Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft flight patterns from the Airport. For updates on that EA, see

[https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).

28. A discussion of any potential changes in the noise environment will be provided in the Noise and Noise-Compatible Land Use section in Chapter 4 of the Draft EIS. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).
29. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace, including flight paths.

A discussion of any potential changes in the noise environment using FAA-approved noise metrics for California (the Community Noise Equivalent Level [CNEL]) will be provided in the Noise and Noise-Compatible Land Use section of

the Environmental Consequences and Mitigation Measures chapter in the Draft EIS.

30. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace.

A discussion of any potential changes in the noise environment will be provided in the Noise and Noise-Compatible Land Use section of the Environmental Consequences and Mitigation Measures chapter in the Draft EIS.

31. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace.

A discussion of the changes in air pollutant emissions resulting from the Proposed Action will be provided in the Air Quality section of the Environmental Consequences and Mitigation Measures chapter of the Draft EIS. 1 under air quality topical – 260 and 1 under proposed action topical

32. The Proposed Action would not result in any change in aircraft operations. An analysis of the potential changes in air pollutant emissions that would occur as a result of the Proposed Action as compared to the No Action Alternative will be included in the Air Quality section of the Draft EIS. In addition, an analysis of the effects on children’s health and environmental justice populations will be included in the Socioeconomics, Environmental Justice, and Children’s Health and Safety section of the Draft EIS.

A discussion of any potential changes in the noise environment will be provided in the Noise and Noise-Compatible Land Use section in Chapter 4 of the Draft EIS.

33. A discussion of any potential impacts to economic activity that would be required as a result of the Proposed Action will be provided in the Socioeconomics, Environmental Justice, and Children’s Environmental Health and Safety Risks section of the Environmental Consequences and Mitigation Measures chapter of the Draft EIS.

34. The direct, indirect, and cumulative impacts associated with the No Action Alternative, the Proposed Action, and reasonable alternatives will be identified and disclosed for the environmental resource categories defined in FAA Order 1050.1F and FAA Order 5050.4B, such as Socioeconomics Impacts, and included in the Environmental Consequences and Mitigation Measures chapter of the Draft EIS.

35. If applicable, construction mitigation measures to account for fugitive dust will be disclosed in the Air Quality section of the Draft EIS. An analysis of the potential changes in air pollutant emissions as result of the Proposed Action as compared to the No Action Alternative will be included in the Air Quality section in Chapter 4 of the Draft EIS. In addition, an analysis of impacts related to hazardous waste as a result of the Proposed Action as compared to the No Action Alternative will be included in the Hazardous Materials, Pollution Prevention, and Solid Waste section in chapter 4 of the Draft EIS.

An evaluation of construction noise and any potential changes in operations noise that would occur as a result of the Proposed Action as compared to the No Action Alternative will be included in the Noise and Noise-Compatible Land Use section of the Draft EIS. Noise levels will adhere to FAA standards in 14 CFR Part 150 Airport Noise Compatibility Planning.

All potential project-related surface traffic impacts will be discussed in the Socioeconomics (including surface traffic), Environmental Justice, and Children's Environmental Health and Safety Risks section in Chapter 4 of the Draft EIS.

36. A list of cumulative projects will be developed and presented in Chapter 3 of the Draft EIS and analyzed in the Cumulative Impacts section in Chapter 4 of the Draft EIS.
37. The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The proposals are independent projects and are not connected actions. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For more information on the EA for airspace please see the following link: [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).

Because the Proposed Action would not result in changes to the Airport's runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace, addressing the use of Section 175 of the FAA Reauthorization Act is outside the scope of this EIS.

38. The Proposed Action does not involve changes to any airspace procedures.
39. The Proposed Action does not involve any changes to any airspace procedures.
40. An alternative of constructing a replacement passenger terminal in the southwest quadrant of the Airport will be included in Chapter 2 of the Draft EIS.

41. The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).
42. The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).
43. The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).
44. The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).
45. The Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of

that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).

46. The Proposed Action would not result in any change in aircraft operations. All alternatives that meet the purpose and need of the Proposed Action will be analyzed in the Draft EIS. One of the alternatives to the Proposed Action is to move the airport to another location (see Chapter 2 of the Draft EIS). If this alternative meets the purpose and need of the Proposed Action, then it will be fully analyzed in the Draft EIS.

In addition, the Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).

47. The Proposed Action would not result in changes to the runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace. Therefore, an alternative associated with flight paths is outside the scope of this EIS.
48. The Proposed Action would not result in any change in aircraft operations. All alternatives that meet the purpose and need of the Proposed Action will be analyzed in the Draft EIS. One of the alternatives to the Proposed Action is to move the airport to another location (see Chapter 2 of the Draft EIS). If this alternative meets the purpose and need of the Proposed Action, then it will be fully analyzed in the Draft EIS.
49. The Proposed Action would not result in any change in aircraft operations. In addition, the Proposed Action does not involve changes to any airspace procedures. The proposal regarding airspace departure procedures is an independent project subject to a separate environmental review. The Air Traffic Organization of the FAA has announced that a separate Environmental Assessment (EA) will be prepared that addresses the proposed amendments to the existing aircraft departure routes from the Airport. Public involvement and input will be part of that EA process. For updates on that EA, see [https://www.faa.gov/air\\_traffic/community\\_involvement/bur/](https://www.faa.gov/air_traffic/community_involvement/bur/).
50. All alternatives that meet the purpose and need of the Proposed Action will be analyzed in the Draft EIS.

51. The FAA does not have the authority to direct or place influence upon general aviation (GA) aircraft operators to shift their activity and services from one airport to another or to operate at specific times of the day. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the general aviation fleet that operates at the Airport or any other public use airport.

The Proposed Replacement Terminal Project would not result in changes to the Airport's runway configuration, timing of operations, or airspace. Additionally, the Proposed Replacement Terminal Project is not expected to result in changes to the aircraft fleet mix because the type of aircraft operating at the Airport is limited by the length of the runways, not the size of the terminal. No change in the length of either runway at the Airport is proposed as part of the project. Finally, the GA jets do not use the terminal for their operations, the enplanement of pilots and their guests, or the loading of cargo. Therefore, the type of general aviation aircraft that would operate at the Airport in the future would be the same as the type of aircraft that operate at the Airport today.

52. The FAA does not have the authority to direct or place influence upon air cargo aircraft operators to shift their activity and services from one airport to another or to operate at specific times of the day. In addition, the Airport Sponsor does not have the authority to place restrictions on a targeted segment of the air cargo fleet that operates at the Airport or any other public use airport.

The Proposed Replacement Terminal Project would not result in changes to the Airport's runway configuration, aircraft fleet mix, number of operations, timing of operations, or airspace. In addition, no expansion of airline cargo facilities is included as part of the Proposed Action (see Response #8, above).

53. All alternatives that meet the purpose and need of the Proposed Action will be analyzed in the Draft EIS. One of the alternatives to the Proposed Action is to move the airport to another location (see Chapter 2 of the Draft EIS). If this alternative meets the purpose and need of the Proposed Action, then it will be fully analyzed in the Draft EIS.
54. Comments regarding the environmental review documentation prepared in compliance with the California Environmental Quality Act are outside the scope of this EIS.