June 11, 2008

Part 161 Study Comment Docket
Burbank-Glendale-Pasadena Airport Authority
Bob Hope Airport
2627 Hollywood Way
Burbank, CA 91505

To Whom It May Concern:

The Los Angeles International Airport (LAX)/Community Noise Roundtable (Roundtable) was created by Los Angeles World Airports (LAWA) in September 2000 as a follow-up to the Federal Aviation Administration’s (FAA) Southern California Task Force. The Roundtable is intended to reduce and mitigate adverse aircraft noise impacts that the users of LAX produce on surrounding communities. Membership of the Roundtable consists of state and local elected officials and staff, representatives of congressional offices, members of recognized community groups, the FAA, the airlines, and LAWA management.

The Roundtable acknowledges that the Burbank-Glendale-Pasadena Airport Authority (BGPAA) is proposing a curfew restriction to eliminate all aircraft operations, with certain exceptions, from 10:00 p.m. to 6:59 a.m. at Bob Hope Airport (BUR) in accordance with the Airport Noise and Capacity Act of 1990 and the Part 161 regulations.

The Roundtable’s membership understands that the intention of this proposed curfew restriction is to provide noise relief to the residents surrounding BUR during those noise-sensitive night-time and early morning hours. However, the proposed curfew restriction, as stated in the draft BUR Part 161 application, would shift aircraft operations to the other noise problem airports in the region such as LAX. The BUR proposed curfew, if approved by the FAA, will not reduce noise, but will shift noise from one area to another. This is contrary to the Roundtable’s expressly stated policy against shifting noise. Aircraft noise currently adversely affects the daily lives of many people residing and working in the vicinity of airports, and constitutes a major negative impact on the quality of life in communities nearby. By shifting noise from BUR to other noise sensitive airports, only certain communities will obtain relief, while others will experience more noise as a result.

The membership of the Roundtable is of the opinion that curfew restrictions, such as the one BUR is applying for, should apply to all airports in the United States to ensure that all communities would benefit from the desired noise relief and that it does not cause impact on other communities. Realistically, however, we are certain that the FAA would not allow that to happen because it will place an undue burden on the national airspace system and is considered to be infeasible.
Therefore, we believe that the best solution for reduction of noise impact at one particular airport without shifting noise to other airports is to utilize all possible noise abatement and/or mitigation programs to the maximum extent possible. Such efforts may include implementing certain noise abatement procedures such as Continuous Descent Approaches or RNAV (Area Navigation) procedures, and consideration of sound insulating homes beyond the 65 CNEL noise impact area. These measures are just some examples of the many noise mitigation efforts that the Roundtable is currently working on or has already accomplished at LAX.

In conclusion, the members of the Roundtable would like to express their strong opposition to the proposed curfew restriction at BUR, and urge BGPAA to consider other alternatives to reduce noise impact at your airport without shifting noise to the communities surrounding other noise problem airports.

The Roundtable is a voluntary and independent body, and this position stated in this letter is the opinion of the majority of the Roundtable’s membership and not the official position of the Federal Aviation Administration, the City of Los Angeles, or Los Angeles World Airports.

Thank you for your consideration of these comments. Please address your reply, if any, to the LAX/Community Noise Roundtable, c/o Los Angeles World Airports, 1 World Way, P.O. Box 92216, Los Angeles, CA 90009-2216, attn. Robert Holden.

Sincerely,

[Signature]

John McTaggart, Chairman
Representing Los Angeles County Fourth District Supervisor Don Knabe

cc: Roundtable members
    VNY Citizens Advisory Committee
    GM Lindsay, LAWA