U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Office of the Regional Administrator

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September 1, 2020

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Dear Mr. Lammerding and Ms. Margheritis:

Thank you for forwarding the memorandum from the Southern San Fernando Valley Airplane Noise Task Force (Task Force) dated May 14, 2020, which we received on June 1, 2020. As described in our preliminary response letter dated June 11, 2020, the Federal Aviation Administration (FAA) completed a feasibility analysis for the 16 Task Force-approved recommendations and their associated recommendations.

Our responses are organized as follows: Appendix A contains responses to the 16 Task Force-approved recommendations, and Appendix B contains responses to the associated recommendations. We also reviewed the recommendations in Appendix B as a starting point for potential alternatives that we will analyze further and possibly include as a reasonable alternative in the Environmental Assessment (EA) for the proposed SLAPP THREE and OROSZ THREE procedures. The associated recommendations that we will assess further are identified in the Next Steps section. We carried the numbering from the memorandum for both the Task Force-approved and associated recommendations, and assigned a letter alphabetically to each of the bulleted recommendations. Appendix C lists the definitions of abbreviations used in this response. FAA Orders referenced throughout this document can be found at https://www.faa.gov/air_traffic/publications/.

With regard to the feasibility analysis, we considered two types in our review of the recommendations:

- Technical Feasibility
    - Can the aircraft's flight management system, pilots, and air traffic controllers execute the proposed procedure safely?

    - Does the proposed procedure meet flight procedure safety and design criteria, as well as other FAA requirements for airspace and air traffic control?
- Operational Feasibility
    - Will the proposed procedure allow aircraft to fly safely through the airspace, considering traffic flows from other airports?

If we found a recommendation to be technically and operationally feasible, we added "ST" or "LT" to denote either feasible in the short term (two years or less) or long term (more than two years). For those recommendations, we would also need to consider financial and environmental feasibility.

- Financial Feasibility
    - What are the anticipated FAA costs associated with the proposed procedure? Some examples of cost considerations are design, flyability, the level of environmental review that must be done (e.g., Categorical Exclusion [CATEX], EA, or Environmental Impact Statement [EIS]), community outreach, review of public concerns, and the number of procedures that require modification.
    - Are the necessary funds available to execute the work and, if not, can we secure funding?
- Environmental Feasibility
    - Is the proposed procedure in compliance with FAA Order 1050.1F, which serves as the FAA's policy and procedures for compliance with the National Environmental Policy Act (NEPA)? Is the proposal in compliance with implementing regulations issued by the Council on Environmental Quality (CEQ)? The provisions of this Order and the CEQ regulations apply to actions directly undertaken by the FAA.
        - An environmental feasibility determination was only applicable if the proposed procedure is considered a federal action that requires analysis under FAA Order 1050.1F and NEPA.
        - If an environmental review is required, the final determination of Environmental Feasibility would be a product of that review and, therefore, determined at a later date. Any cursory determination of Environmental Feasibility without following the complete process would be pre-decisional and not in compliance with Agency policy and federal regulations.

It is important to note that potential future implementation of recommendations determined to be technically, operationally, financially and environmentally feasible would not necessarily provide noise relief, and/or could shift noise from one community to another.

Please also note the following clarifying definitions as they apply to the departure procedures at Hollywood Burbank (BUR) and Van Nuys (VNY) airports.

- Standard Instrument Departure (SID): A printed departure procedure that air traffic control (ATC) uses to reduce pilot/controller workload. SIDs take into consideration noise abatement, airspace management guidelines, terrain, and obstacle avoidance. A SID essentially formalizes how air traffic controllers manage departures. Open and radar vector are two types of SIDs.

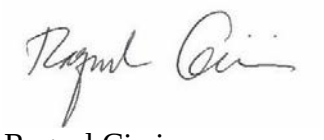
- Open SID: An open SID begins with a defined RNAV route, has an "open" portion in the middle where ATC vectors aircraft, and then ends with a defined RNAV route. Open SIDs enable more precise and predictable flight paths at lower altitudes and are, therefore, less conducive to providing dispersion at these altitudes. This means that any Task Force recommendations for an open SID would not meet the objective of achieving greater **initial** dispersion.
- Radar vector SID: A departure procedure that ATC uses to provide radar navigation guidance to a filed or assigned route or fix. Assigned headings can also be affected by factors such as wind, temperature, and aircraft performance characteristics. Because of these factors, radar vector SIDs provide the greatest opportunity for initial aircraft dispersion. As an example, the SLAPP ONE and OROSZ TWO departures (currently in use at BUR) use radar vector SIDs, which begin with an assigned compass heading. This heading can vary within defined departure procedure criteria and facility policies, and when accompanied by the phrase "or as assigned by ATC."
- In this document, where the Task Force recommendation referred to the proposed SLAPP procedure as SLAPP TWO, we have corrected the name to SLAPP THREE. A separate SLAPP TWO procedure is currently scheduled for September 10, 2020. The changes occurring in that amendment are clerical changes to clarify instructions for pilots and ATC and will not cause ground track changes.

For recommendations that refer to the Instrument Flight Procedures (IFP) Information Gateway in the Next Steps, the Task Force can coordinate with the appropriate airport to begin the IFP Request Process by completing a request form located on the FAA IFP Information Gateway website. This ensures the appropriate FAA parties review every request. All technical requests are treated the same during the standard FAA review process and, if appropriate, the FAA will complete a feasibility study and environmental review of the request. This process, from start to implementation, can take more than two years. You will receive updates throughout the process on the status. The link to submit your request is https://www.faa.gov/air_traffic/flight_info/aeronav/procedures/.

Lastly, the FAA notes our commitment to consider comments about the feasibility of dispersal heading or other lateral track variations during the EA process for the proposed SLAPP THREE and OROSZ THREE procedures, relating to the request of the president of the Burbank-Glendale-Pasadena Airport Authority on March 27, 2019.

If we can be of further assistance, please contact my office at (424) 405-7000.

Sincerely,



Raquel Girvin
Regional Administrator

Enclosures (3)
Appendix A: Task Force-Approved Recommendations

Appendix B: Associated Recommendations
Appendix C: Abbreviations

Cc w/Enclosures:

Senator Dianne Feinstein
Senator Kamala Harris
Congressman Adam Schiff
Congressman Brad Sherman
Congressman Ted Lieu
Congressman Tony Cardenas

Honorable Emily Gabel-Luddy, Chair Southern San Fernando Valley Airplane Noise Task Force
Honorable Paul Krekorian, Vice Chair, Southern San Fernando Valley Airplane Noise Task Force

APPENDIX A

Task Force-Approved Recommendations

Recommendation 1: Immediately restore the Hollywood Burbank Airport (BUR) Runway 15 departure flight tracks to 2007 conditions without implementing a new procedure.

Adjustment Type	Track
Adjustment Detail	Immediately return to 2007 flight tracks
Evaluation	The conditions that resulted in the 2007 BUR departure flight tracks no longer exist. Changed circumstances prevent a return to those conditions. To give an example, the number of air carrier operations at BUR increased by 22.4 percent between 2016 and 2018. Maintaining the necessary separation of aircraft within the airspace above the San Fernando Valley with this increased volume of traffic (which continued until the onset of the COVID-19 public health emergency) prevents ATC from regularly turning aircraft to the north more quickly without potentially causing conflicts. Another example is the fleet mix. It has changed to include more jets, which often make wider turns than piston or turbo-prop aircraft (depending on various factors like load and the type of jet). As part of the Southern California Metroplex Project, the FAA in March 2017 implemented two new satellite-based departure routes for BUR – the SLAPP and the OROSZ. However, the satellite-based portions of the routes do not begin in the immediate airport environment. Rather, they begin significantly north and northwest of the airport: SLAPP at the RAYVE waypoint and OROSZ at the TILLR waypoint. RAYVE is approximately 11 NM north of BUR, and TILLR is approximately 17 NM northwest of BUR. The initial segments of the SLAPP and OROSZ are radar vector SIDs, as were the procedures that existed prior to the Metroplex implementation. The FAA will not cancel the satellite-based portions of the SLAPP and OROSZ and return to the routine use of conventional departure procedures for these departures. The current RNAV segments of the procedures are designed to fly hundreds of miles and to transition from terminal airspace to en route airspace (and vice versa). Removing these procedures (by flying the older conventional procedures) would impact operations at several different facilities and add complication through the National Airspace System. Removing current RNAV procedures would require additional air traffic controller involvement, especially with the aircraft after they depart from BUR, adding unnecessary

	complexity to an already congested system and reducing aircraft flight predictability. Metroplex RNAV procedures provide built-in separation with other Burbank area procedures that conventional procedures cannot provide. With conventional procedures, additional separation between departures from BUR would be required to ensure the required distance between aircraft as they leave terminal airspace and enter the higher-altitude en route airspace (FAA en route airspace requires 5 NM of separation whereas SCT only requires 3 NM). Due to available ramp space and other factors, delays at BUR would be expected. Because RNAV procedures in the surrounding airspace were designed in concert, use of a conventional departure procedure at BUR would significantly impact aircraft departing LAX and BUR simultaneously. Thus, delays at LAX are possible as well. Additionally, Congress has required the FAA to prioritize the expeditious implementation of PBN procedures nationwide, of which the SLAPP and OROSZ procedures are part. FAA Modernization and Reform Act of 2012, Pub. L. No. 112-95, § 213(a)(1)(A), 126 Stat. 11, 47.
Feasibility Assessment	Not operationally feasible
Feasibility Justification	Although the FAA cannot restore the BUR Runway 15 departure flight tracks as they existed in 2007, the FAA does intend to modify these departure procedures. The FAA has proposed the SLAPP THREE and OROSZ THREE departure procedures, which are discussed below. The FAA firmly believes that, once implemented, these new procedures will help address local concerns about aircraft overflights. The FAA is currently preparing an Environmental Assessment of these proposals and that document is the most appropriate vehicle to consider proposals to address a shift in departure tracks to the south. The Environmental Assessment will also provide the FAA an opportunity to more fully review requests for dispersion of flight tracks for those departures.
Next Steps	No further FAA action on this specific recommendation

Recommendation 2: [a)] Immediately stop the use of the procedure with the PPPRY Waypoint and [b)] design and implement a modified RNAV (Required Navigation) procedure for Van Nuys Airport (VNY) Runway 16R that results in earlier turns of departing flights and allow a greater percentage of the departing flight tracks to be over the uninhabited Sepulveda Basin as is the case when using the 2.2 DME departure procedure at VNY.

Adjustment Type	Track
Adjustment Detail	Modify track and location of waypoint
Evaluation	a) Immediately stopping the use of the procedures using the PPRRY waypoint would require the return to conventional procedures and would increase complexity in Southern

	California airspace. RNAV procedures are designed with procedural separation built in. Changing these procedures would, at a minimum, affect the RNAV procedures into LAX. These RNAV procedures are designed to fly hundreds of miles and transition from terminal to en route airspace, and vice versa. b) LAWA and the Los Angeles City Council had submitted a similar request to the FAA in March 2019. They specifically requested that the waypoint be moved back to the 2.2 DME location. At the time, the FAA explored a number of options that led to the design of an operationally feasible notional procedure that best met the intent of that request. That notional procedure also best meets the intent of this recommendation. The FAA presented that notional procedure at the Van Nuys Citizens Advisory Council (VNY CAC) meeting on August 6, 2019. Because of various concerns expressed by the community, City Councilmembers have not taken any action to request that the FAA move forward with this proposal. Since there was no community consensus for the FAA's proposed notional procedure presented at the VNY CAC in August 2019, and it seemed that many residents wanted to address both BUR and VNY airports together, the VNY issue was referred to the Task Force. Implementing this change would take more than two years to complete. It would require complex environmental reviews and community engagement, and the FAA would need to convene a procedure review board to issue waivers and approval letters for this design.
Feasibility Assessment	a) Not operationally feasible b) Operationally feasible (LT), financial feasibility to be determined
Feasibility Justification	a) Returning to conventional procedures, even if temporarily, will impact operations at other facilities. RNAV procedures are designed with procedural separation built in. Changing these procedures would, at a minimum, affect the RNAV procedures into LAX. While we understand community concerns about departures in close proximity to VNY, these RNAV procedures are designed to fly hundreds of miles and transition from terminal to en route airspace, and vice versa. b) See evaluation section.
Next Steps	a) No further FAA action b) Airport authority submits IFP Information Gateway request following its internal approval process for making such a request.

Recommendation 3: Immediately increase the climb gradient for departure procedures at Hollywood Burbank Airport (BUR) and Van Nuys Airport (VNY) to the maximum gradient

allowable without waivers, expedite any waivers required to exceed a 500-foot per nautical mile climb gradient, and increase the climb gradient to above 500 feet per nautical mile.

Adjustment Type	Aircraft Performance
Adjustment Detail	Increase climb gradient
Evaluation	Non-piston aircraft generally climb at or above 500 feet per NM, and one possible FAA notification such as a Notice to Airmen (NOTAM) would only be effective to 500 feet above the airport per FAA Order 8260.46, 2-1-1.e.(2)(a-c). Anything higher must be for an obstacle. The FAA analyzed two weeks of departure climb data from BUR for the Boeing 737 family of aircraft and Airbus 320 family of aircraft commonly used by scheduled air carriers at BUR. The FAA found the average climb gradient was approximately 1,019 feet per NM for Boeing 737 aircraft and 1,075 feet per NM for Airbus 320 aircraft. If procedural climb gradients are increased beyond the rate aircraft are currently climbing, the higher thrust required might increase noise in the immediate area around the airport. The FAA doesn't build procedures outside of criteria unless an equivalent level of safety can be achieved. The FAA's Office of Flight Standards (AFS) sets the standards, and only they can determine if the equivalent level of safety is sufficient and waive the criteria. Furthermore, a determination under the applicable airport sponsor grant assurances as to whether an access restriction is reasonable must consider safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the pilot-in-command (PIC) authority and safety of flight. See *FAA 2014 LAX Part 161 Decision*, effective November 7, 2014, 79 FR 70267. Furthermore, ATC workload may increase because aircraft that are unable to meet the higher climb gradient would need to be re-cleared/amended. Climb gradient procedures only apply to instrument flight rules (IFR) aircraft.
Feasibility Assessment	Not operationally feasible
Feasibility Justification	Most non-piston aircraft are already climbing at a rate greater than 500 feet per NM. A NOTAM is not feasible due to the constraints of temporary NOTAMs, per FAA Order 7930.25, 7-3-1, which states, "If the

	condition cannot be corrected within 224 days, the NOTAM issuing authority must obtain Flight Standards approval from AFS−400 for the NOTAM to remain in effect beyond the 224−day limitation. It is important that NOTAMs not be allowed to remain active for excessive periods of time; therefore, an FDC IFP NOTAM must not be canceled and re-issued without Flight Standards approval."
Next Steps	No further FAA action

Recommendation 4: Conduct a study to determine how to obtain the lowest noise levels from aircraft departures from Hollywood Burbank Airport (BUR) Runway 15 and Van Nuys Airport (VNY) Runway 16R in the South San Fernando Valley communities through increased climb gradients, noise abatement departures profile (NADP) procedures, de-rated takeoff procedures, or a combination of the three alternatives.

Adjustment Type	Conduct study
Adjustment Detail	
Evaluation	While this recommendation goes beyond the scope of FAA actions authorized and described in 14 CFR Part 150, several aspects of this recommendation could potentially be accomplished by LAWA and the Burbank-Glendale-Pasadena Airport Authority through the processes described Part 150. Therefore, please see responses to Recommendation 14 and associated Task Force member recommendations. The FAA does not conduct this type of study for airports.
Feasibility Assessment	N/A
Feasibility Justification	N/A
Next Steps	N/A
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA*, 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. A determination under the grant assurances as to whether such an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the PIC

	authority and safety of flight. See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

Recommendation 5: The Task Force opposes the FAA's proposed changes to the SLAPP and OROSZ departure procedures and requests the FAA design and implement a procedure for maximum dispersion of departures from Runway 15 and Hollywood Burbank Airport (BUR).

Adjustment Type	Track
Adjustment Detail	New procedure to increase dispersion
Evaluation	As we proceed with the EA for the proposed SLAPP THREE and OROSZ THREE procedures, we are considering adjusting the originally proposed procedures as an alternative (please see our response to 5.2 in Appendix B). We are also considering the feasibility of dispersal heading or other lateral track variations during the EA process for the proposed SLAPP THREE and OROSZ THREE procedures, as requested by the Burbank-Glendale-Pasadena Airport Authority. (Any dispersion of aircraft departing runway 15 would have to occur to the south and east of a 213° initial heading. The resultant flight paths would likely be farther south than those currently flown.)
Feasibility Assessment	Will be assessed in the EA
Feasibility Justification	Not applicable
Next Steps	The FAA proceeds with the EA process that includes considering alternatives and the feasibility of dispersal headings or other lateral track variations.

Recommendation 6: Replace current NextGen aircraft procedures at Hollywood Burbank Airport (BUR) and Van Nuys Airport (VNY) with procedures that provide better dispersion of flight tracks, such as [a)] "open" departures and [b)] diverse vector area (DVA) procedures.

Adjustment Type	Track
Adjustment Detail	Disperse departure flight tracks
Evaluation	All BUR and VNY RNAV departure procedures are open SIDs or contain vectors in their initial segments, i.e., are radar vector SIDs.
Feasibility Assessment	a) Operationally feasible (ST) b) Not operationally feasible
Feasibility Justification	a) The current VNY and proposed BUR RNAV departures are open SIDs, offering a range of headings after an initial RNAV track. The current BUR RNAV departures are radar vector departures that have an allowable range of headings. Aircraft departing on these SIDs will fly the initial heading published on the procedure (210°) or a heading assigned by ATC, until receiving additional instruction. This type of departure allows for the most

	initial dispersion of any of the departures currently available. If the objective of the recommendation for an open SID is better initial dispersion at BUR and VNY, open SIDs would not meet this objective. Please see the main body of this letter for definitions and Recommendation 1 for further information on RNAV departure procedures. b) The FAA's use of DVAs and radar vector SIDs already provides for the maximum degree of dispersion possible by promoting efficiency and allowing ATC to turn aircraft on-course as soon as possible. However, the FAA's use of DVAs and radar vector SIDs must be solely for the purpose of maintaining the safety and efficiency of the NAS. The use of a DVAs and/or radar vector SIDs for the purpose of dispersion cannot be mandated and would not be operationally feasible. NOTE: Due to a pending national policy change, ATC's use of DVAs will be changing to disallow the concurrent use of DVAs and SIDs, and to eliminate the existence of both DVAs and SIDs at the same airport. However the functional use of a DVA will remain available to ATC, if desired. The new policy will allow ATC to request conversion of the DVA to a SID with a clearly defined range of possible headings, assignable by ATC. This change will remove ambiguity and increase pilot understanding of all departure requirements. Please see Recommendation 6.4 for an example. The DVA is rarely used in the immediate area of the airport. The dispersion could be achieved by creating radar vector SIDs. The FAA's Office of Environment and Energy is currently studying dispersion off the end of the runway for RNAV departure procedures beyond what can be achieved with radar vector. The FAA is studying ways to use PBN technology to create systematic dispersal of flight tracks while maintaining safety and efficiency. It is important to understand, however, that it is not possible to replicate the kind of random dispersal that occurs when planes are flying using ground based navigation—in other words, introducing systematic dispersal using satellite based routes would not achieve the outcome of "going back to the way it was." That type of dispersal is no longer possible.
Next Steps	a) The FAA has proposed open SIDs (SLAPP THREE and OROSZ THREE) to replace the current radar vector SIDs at

	BUR and is evaluating them together with reasonable alternatives in the ongoing EA. The FAA proceeds with EA process that includes considering alternatives and the feasibility of dispersal headings or other lateral track variations. b) No further FAA action

Recommendation 7: Provide for Instrument Flight Rules (IFR) procedures for aircraft to arrive all runways at Hollywood Burbank Airport (BUR).

Adjustment Type	Procedures
Adjustment Detail	Add BUR IFR arrival procedures
Evaluation	Due to constraints caused by higher terrain to the north through the southeast, the required descent gradients on straight-in procedures would exceed the maximum allowed by current design criteria, in accordance with FAA Order 8260.58 and FAA Order 8260.3.
Feasibility Assessment	Not technically feasible
Feasibility Justification	Current instrument procedures allow aircraft to circle to other runways in visual conditions. Additionally, visual flight rules (VFR) aircraft can land on other runways. However, due to higher terrain to the north, east, and south, straight-in procedures to Runways 15, 26, and 33 cannot be designed without exceeding maximum descent gradient criteria, in accordance with FAA Order 8260.58 and FAA Order 8260.3.
Next Steps	No further FAA action

Recommendation 8: Create "open" Standard Instrument Departure (SID) Procedures at Hollywood Burbank Airport (BUR) for Runway 8, Runway 26 and Runway 33 mimicking the ELMOO NINE conventional procedure.

Adjustment Type	Track
Adjustment Detail	Mimic ELMOO NINE conventional procedure for BUR Runways 8, 26, and 33.
Evaluation	Higher terrain surrounding the airport and FAA Order 8260.58 (Chapters 1 and 5) criteria would not allow open SIDs for Runways 8 and 33. Open SIDs require an initial RNAV segment that would take the aircraft into terrain north and east of the airport and are not feasible from runways other than Runways 15 and 26. In addition, use of Runway 26 for departures would create conflicts when Runway 8 is being used for landing. Other constraints involve aircraft type/size. Departures on Runway 8 are restricted to aircraft weighing 12,500 lbs. or less.
Feasibility Assessment	Not technically feasible
Feasibility Justification	Not possible due to terrain and other constraints
Next Steps	No further FAA action

Recommendation 9: Restrict aircraft from operating during the night at both Hollywood Burbank Airport (BUR) and Van Nuys Airport (VNY) and penalize and identify publicly aircraft operators that violate the mandatory curfew.

Adjustment Type	Modification of BUR and VNY Noise Rules
Adjustment Detail	14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions*.
Evaluation	While the Task Force directed this recommendation to the Federal legislative representatives, the FAA offers the following background information for context: Neither BUR nor VNY has a mandatory curfew. BUR's noise rules were grandfathered under the Airport Noise and Capacity Act of 1990 (ANCA) and only prohibits the loudest and noisiest jets. VNY has had a partial nighttime departure curfew in place since 1981 (grandfathered with ANCA) to prohibit the oldest and noisiest jets from operating during the nighttime hours. Today, any new proposed local restrictions or changes must comply with ANCA and FAA grant assurances Title14, C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions* establishes the process and more detailed criteria for an airport to propose (and for FAA to evaluate) proposed restrictions. ANCA limits airport sponsors' ability to implement new restrictions including new fines on aircraft operating into or out of their airport after 1990. ANCA also phased out Stage II aircraft (i.e., 727, 737-200, etc.) over 75,000 lbs., on December 31, 1999. The FAA Modernization and Reform Act of 2012 phased out Stage II (i.e., Lear 24's, Gulfstream II, etc.) aircraft under 75,000 lbs., on December 31, 2015. FAA grant assurances review is also critical because it impacts non-stage aircraft. The assurances prevent unjust discrimination to all types, kinds, classes of aeronautical activities. A noise or access restriction on the operation of stage 3 aircraft is only allowed in 3 circumstances: 1. FAA approves it after an airport sponsor applies for such approval. The procedures and substantive standard governing FAA's reviewing and approval, if applicable, are provided for in 14 CFR part 161. 2. The restriction is pre-existing and meets the grandfather criteria under ANCA. 3. The restriction is passed with the unanimous consent of the sponsor and all aircraft operators. Therefore, a vast majority of the airlines and cargo carriers at BUR and general aviation aircraft at BUR and VNY can operate 24/7 365 days a year without violating noise rules. It is important to note that (a) Burbank's ordinance imposing a nighttime curfew

	at BUR was struck down by the Supreme Court. *City of Burbank v. Lockheed Air Terminal*, 411 U.S. 624 (1973) and (b) there is an existing ANCA/Part 161 record for BUR (2009). See FAA 2009 BUR Part 161 decision effective October 30, 2009, 74 FR 66397.
Preliminary Assessment	N/A
Feasibility Justification	N/A
Next Steps	N/A
Additional FAA Response	Neither BUR nor VNY currently has a mandatory curfew. If the Burbank-Glendale-Pasadena Airport Authority (BGPAA) or Los Angeles World Airports (LAWA) wish to pursue FAA's approval to establish and enforce a mandatory curfew at BUR or VNY pursuant to Airport Noise and Capacity Act of 1990 (ANCA), it may request such authorization as prescribed in 14 CFR Part 161, *Notice and Approval of Airport Noise and Access Restrictions*. Should this occur, the FAA will consider the request and provide a formal determination after reviewing the proposal according to the requirements of 14 CFR Part 161 and compliance with grant assurances.

Recommendation 10: Restrict the hours of the Customs and Border Protection Office at Van Nuys Airport (VNY).

Evaluation	Non-FAA response required

Recommendation 11: Increase enforcement of the existing voluntary curfew at Hollywood Burbank Airport (BUR).

Evaluation	Non-FAA response required
Adjustment Type	Modification of BUR's Noise Rules
Adjustment Detail	14 C.F.R. Part 161 *Notice and Approval of Airport Noise and Access Restrictions*.
Evaluation	While the Task Force directed this recommendation to BGPAA, the FAA offers the following background information for context: Depending on the nature of the "voluntary" curfew, it may or may not be enforceable under ANCA and airport grant assurances. Unless operators and an airport sponsor agreed to access restrictions as part of an agreement pursuant to part 161, the voluntary curfew is not enforceable. BUR's noise rules were grandfathered under Airport Noise and Capacity Act of 1990 (ANCA) and only prohibits the loudest and noisiest jets. A vast majority of the airlines and general aviation aircraft can operate anytime without violating BUR's noise rules.

Preliminary Assessment	Not permissible unless the airport goes through the Part 161 process to establish an enforceable curfew and meets the grant assurances.
Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless BGPAA pursues a part 161 process.
Additional FAA Response	A voluntary curfew is not enforceable. Enforcing a voluntary curfew would violate ANCA. Depending on the nature of the "voluntary" curfew, it may or may not be enforceable under ANCA and airport grant assurances. Unless operators and an airport sponsor agreed to access restrictions as part of an agreement pursuant to part 161, the voluntary curfew is not enforceable. BUR's noise rules were grandfathered prior to the implementation of ANCA and only prohibits the loudest and noisiest jets. Therefore, a vast majority of the airlines and general aviation aircraft are able to operate at BUR anytime without violating its noise rules. In addition, the recommendation would have to be considered from a grant assurances perspective which is critical because it impacts non-stage aircraft. See Chap. 13 of FAA Order 5190.6B.

Recommendation 12: Increase the eligibility area for noise mitigation programs in communities near airports, which requires federal funding to implement.

Evaluation	Non-FAA response required
Adjustment Type	Adjusting Local Land Use Compatibility Requirements in surrounding cities and update of Federal Noise Mitigation Eligibility Requirements
Adjustment Detail	
Evaluation	While the Task Force directed this recommendation to the Federal legislative representatives, the FAA offers the following background information for context: FAA Order 5100.38D, *Airport Improvement Program Handbook* defines eligibility requirements for federal funding. The FAA's ability to award AIP grants and approve PFC funds would require that the residential land uses in question be classified as non-compatible with, or adversely affected by, airport noise. Non-compatibility and adverse effects are defined as either being (a) within the CNEL 65 dB or higher noise contour, as shown on a current FAA-accepted Noise Exposure Map or (b) as reflected in a final National Environmental Policy Act (NEPA) document. A

	local jurisdiction may use a lower local noise standard (i.e., CNEL 60 dB) for mitigation if the respective jurisdiction formally adopts the standard for all local land use compatibility, not just for airport noise mitigation purposes. However, federally- funded noise mitigation in such areas would be a lower priority than in areas that meet the standard for significant noise, and the community would be expected to rezone such areas for non-residential (and thus less noise-sensitive) purposes.
Preliminary Assessment	Technically feasible. Though BUR's existing 4th Quarter 2019 Noise Contour is based on measured noise surrounding the airport and submitted to Los Angeles County and the State of California as part of its State noise variance requirements, because of a successful noise abatement and mitigation program BGPAA has reduced its noise impact area from approximately 400-acres 70 dB CNEL to a 65 dB incompatible impact area of 13.73 acres.
Feasibility Justification	Technically feasible but would require local changes across all local land use compatibility, not just for airport noise mitigation purposes.
Next Steps	Would require local changes across all local land use compatibility, not just for airport noise mitigation purposes.
Additional FAA Response	Current FAA policy, generally limits federally-funded noise mitigation, such as property acquisition or the installation of sound insulation, to impacted properties within the 65 dB CNEL (or higher) noise contours, provided the land uses meet the requirements prescribed under FAA Order 5100.38D, *Airport Improvement Program Handbook*. FAA's policy applies to noise mitigation funded by both Airport Improvement Program (AIP), Passenger Facility Charge funding (PFC), and airport revenue. Under FAA policy, a local jurisdiction may adopt a lower local noise standard (i.e. CNEL 60 dB) for mitigation if the standard is formally adopted by the respective jurisdiction for all local land use compatibility, not just for airport noise mitigation purposes. Such communities would also be expected to modify the zoning for such areas to eliminate residential land use and other noise-sensitive areas. From a grant compliance perspective, any noise restriction should incorporate a "balanced approach" as discussed in Section 13.8 of FAA Order 5190.6B

Recommendation 13: Require the use of the Environmental Analysis (EA) as the minimum standard to meet the requirements of the National Environmental Policy Act (NEPA) for implementing any FAA proposed change to aircraft flight procedures.

Adjustment Type	Environmental Assessment

Adjustment Detail	Create minimum standard
Evaluation	This request is contrary to FAA policy requiring compliance with NEPA, documented in FAA Order 1050.1F. The CEQ regulations establish procedures for complying with NEPA. In accordance with 40 CFR § 1507.3 of the CEQ regulations, FAA Order 1050.1F contains the FAA's implementing procedures, which supplement those regulations. (This request is inconsistent with FAA environmental policy and Executive Orders, which emphasize using categorical exclusions and other environmental review streamlining tools to reduce delay.)
Feasibility Justification	FAA Order 1050.1, 3-1.2.a.-b.
Next Steps	No further FAA action

Recommendation 14: Maintain and update when and if necessary the Noise Exposure Map (NEM) and Noise Compatibility Program (NCP) at Hollywood Burbank Airport (BUR) and Van Nuys Airport (VNY) in order to continue to provide noise mitigation to all potentially eligible property owners and continue to monitor the aircraft operations and associated noise levels throughout the San Fernando Valley communities. The NCPs will specifically consider preferential runway use programs in a coordinated approach at both airports to determine whether more northerly flow provides noise benefits. The NCP at BUR will also analyze Runway 33 arrivals to limit the use of the flight path some operators use to arrive over the Santa Monica Mountains.

Evaluation	Non-FAA response required
Adjustment Type	Noise Study
Adjustment Detail	Update 14 C.F.R Part 150 Airport Noise Compatibility Planning (NCP) program
Evaluation	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: Preparation of a Part 150 by an airport sponsor is voluntary and is NOT a requirement of the FAA, nor is it a grant agreement obligation requirement (unless the airport has requested and received an AIP grant to fund a Part 150 program). Part 150 NEM's requires only the existing condition and 5-year forecast maps. The NCP is the sponsor's proposed program, subject to regulatory process requirements and FAA approval. It can evaluate numerous noise compatibility alternatives including, but not limited to, preferential runway programs. The NCP reviews and analyzes Noise Abatement Measures (actions that reduce sound at the source i.e. routing arrival and departure flight paths over less noise sensitive areas), Noise Mitigation Measures – (actions that reduce noise at the receptor, i.e. sound insulation), Land-Use

	Measures (i.e. zoning or other controls) and Continuing Program Measures (i.e. housekeeping measures for periodic review and maintenance of the NCP itself) on how to reduce the number of people affected by noise of 65 DNL (CNEL in California) or greater and how to prevent the introduction of new non-compatible land uses within the 65 DNL (CNEL) noise contour.
Feasibility Assessment	Conducting a Part 150 is feasible if the airport sponsors choose to do so. It is premature to assess the feasibility of any specific measure(s) that may be included in the resulting Noise Compatibility Program.
Feasibility Justification	14 C.F.R Part 150
Next Steps	BGPAA and LAWA may initiate a Part 150 Update if they choose to do so.
Additional FAA Response	FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

Recommendation 15: Create a Citizen's Advisory Committee at Hollywood Burbank Airport (BUR) to address community concerns throughout the San Fernando Valley.

Adjustment Type	Create Citizen' Advisory Committee
Adjustment Detail	Monitoring of Noise Research Methods
Next Steps	Non-FAA response required.

Recommendation 16: Require the Federal Aviation Administration (FAA) to immediately respond to community and Airport requests and provide post implementation results from NextGen aircraft procedures including the implementation of the Southern California Metroplex and future implementations and all supporting documents, the Noise Screen that was provided to Benedict Hills in about January 2018, and all documents requested under the Freedom of Information Act (FOIA).

Adjustment Type	Amendment of U.S.C.
Adjustment Detail	Change 5 U.S.C. § 552
Evaluation	Regarding your recommendation that the FAA respond immediately to requests under FOIA for all documents, please note that the FAA follows the FOIA and applicable U.S. DOT and

	FAA FOIA policies. FAA Order 1270.1A provides guidance governing the processing of requests for agency records under the FOIA, Title 5 of the U.S.C. § 552, and implements DOT regulations found in Part 7, Title 49 of the Code of Federal Regulations. In implementing the FOIA, it is the DOT's policy to make information available to the public uniformly and consistently and to provide the maximum allowable disclosure of records to the greatest extent possible in keeping with the spirit of the statute. The FOIA directs each FAA office and employee to cooperate fully by making records available to the public in a timely manner to the fullest extent consistent with this policy. A FOIA request should contain a sufficient description of the records being sought to enable an agency employee who is familiar with the subject area to locate the records with a reasonable amount of effort. Further, in accordance with U.S. Department of Justice guidance, a FOIA request for records is considered as a perfected request when it adequately describes the records sought, is received by the FOIA office of the agency or agency component in possession of the records, and for which there is no remaining question about the payment of applicable fees. Some individuals and the City of Los Angeles have submitted requests under FOIA for records related to the BUR Runway 15 departures. The City of Los Angeles has specifically submitted two FOIA requests. The first request, identified by FOIA No. 2019-001114WS, is currently on appeal in the U.S. District Court for the Central District of California. The FAA cannot comment on pending litigation, but it is working with the City of Los Angeles on disclosing additional potentially releasable records subject to that FOIA request. The FAA is in the process of responding to the second request, identified by FOIA No. 2020-003909WS, and is in frequent communication with the City of Los Angeles regarding it. The City of Los Angeles did not respond to the FAA FOIA office's fee waiver request clarification for approximately two months, which caused a delay in the process. Additionally, the FAA has provided the following information or responses: On Jan. 14, 2020, the FAA responded to a Sept. 27, 2019 request containing 25 questions from the Task Force. On Feb. 20, 2020, the FAA wrote the Task Force to address four points made by HMMH during their briefing to the Task Force and the FAA also provided BUR Air Carrier OPS 2007-2019.

	On Feb. 29, 2020, the FAA responded to a Jan. 2020 request containing answers to various questions from the Task Force and provided a copy of the 2018 SoCal Post Implementation Analysis Briefing by MITRE.
Supporting Analysis	5 U.S.C. § 552
Feasibility Assessment	N/A
Next Steps	FAA continuing to process current FOIA requests

APPENDIX B

Associated Recommendations

1.1 Provide additional training, reviews and support for ATC. Recommendations 1.1a-n are a series of recommendations provided by an ATC consultant during a Task Force meeting.

1.1.a Conduct System Service Review (SSR) on resource management at both Southern California TRACON (SCT) and BUR Sector. [This recommendation was also submitted by Senators Feinstein and Harris in a letter dated May 6, 2020.]	
Adjustment Type	Review
Adjustment Detail	Conduct SSR
Evaluation	FAA Order 7210.634 requires a continual review of services provided and initiation of SSRs on a regular basis. The intent of an SSR is to review the air traffic services provided in any situation at any time under any circumstances. In accordance with FAA Order 7210.634, 3-2.e.(2)(h), resource management is already considered as part of the data reviewed in an SSR.
Feasibility Assessment	Feasible – existing FAA requirement
Feasibility Justification	SSRs are conducted in accordance with FAA Order 7210.634, Chapter 3.
Next Steps	No additional FAA action, due to required periodic reviews in accordance with FAA Order 7210.634, Chapter 3.

1.1.b Review how to manage workload at positions to maintain efficiency.	
Adjustment Type	Resource Management
Adjustment Detail	Managing traffic volume/flow
Evaluation	FAA Order 7210.3, 2-6, addresses watch supervision requirements, including monitoring and managing traffic volume/flow and position assignments.

Feasibility Assessment	Feasible – existing FAA requirement
Feasibility Justification	Operationally feasible and a required part of Operations Supervisor/Controller in Charge duties.
Next Steps	Already being conducted - no further FAA action

1.1.c Conduct Traffic Management Reviews (TMR) in the San Fernando Valley area to provide detailed analysis of impact of Traffic Management Initiatives (TMI). [This recommendation was also submitted by Senators Feinstein and Harris in a letter dated May 6, 2020.]	
Adjustment Type	Review
Adjustment Detail	Conduct a TMR analysis of the San Fernando Valley area
Evaluation	SCT can conduct a TMR of TMIs involving BUR/VNY aircraft, in accordance with FAA Order 7210.634.The source data is only retained for 45 days. With the current decrease in flights caused by the COVID-19 public health emergency, there are very few, if any, flight delays affecting BUR or VNY and, therefore, no relevant information available. TMIs affecting BUR and VNY only keep the aircraft grounded; they do not impact how aircraft fly the departure procedures once airborne.
Feasibility Assessment	Feasible – existing FAA requirement
Feasibility Justification	Facilities having a TMU, such as SCT, must ensure that services provided are continually reviewed and initiate TMRs on a regular basis.
Next Steps	Existing FAA requirement - no further FAA action

1.1.d Provide refresher training on applying and administering TMIs for SCT and BUR Sector controllers.	
Adjustment Type	Training
Adjustment Detail	TMI training for SCT and BUR sector controllers
Evaluation	Sector controllers do not create TMIs, and must comply with TMIs as issued by the overlaying ARTCC.
Feasibility Assessment	Feasible – existing FAA requirement when operationally warranted
Feasibility Justification	Non-compliance would be immediately identifiable and addressed.
Next Steps	Existing FAA requirement when operationally warranted - no further FAA action

1.1.e Conduct Operational Skills Assessments (OSAs) on how traffic restrictions are applied and communicated in the SCT and BUR Sector areas.	
Adjustment Type	Review

Adjustment Detail	OSAs on traffic restrictions
Evaluation	OSAs are performed in sufficient quantity to provide a valid quality control sample of the various positions and functions.
Feasibility Assessment	Feasible – existing FAA requirement
Feasibility Justification	OSAs are conducted in accordance with FAA Order 7210.634, 2-2.b, "Reviewers are expected to identify potential systemic issues associated with training, efficiency, airspace, procedures, directives, and equipment. Potential systemic issues are addressed through the systemic issue review (SYSIR) process." Also, all controllers must comply with TMIs as issued by the overlaying ARTCC. Non-compliance would be immediately identifiable and addressed.
Next Steps	Existing FAA requirement - no further FAA action

1.1.f Provide additional training on minimum requirements of radar separation. [This recommendation was also submitted by Senators Feinstein and Harris in a letter dated May 6, 2020.]	
Adjustment Type	Training
Adjustment Detail	Radar separation training
Evaluation	ATC turns aircraft for efficiency and safety, which does not always equate to minimum separation. Separation standards are designed as the minimum—not the absolute—to keep aircraft safely apart. A quality control process is in place for a systematic approach to safety risk analysis, which includes identifying and addressing issues.
Feasibility Assessment	Feasible – existing FAA requirement
Feasibility Justification	Reviews are required periodically in accordance with FAA Order 7210.634, 2-2.
Next Steps	Existing FAA requirement – no further FAA action

1.1.g Focus on vectoring, radar separation minima, and aircraft characteristics.	
Adjustment Type	Training
Adjustment Detail	Controller proficiency training
Evaluation	Vectoring, radar separation minima, and aircraft characteristics are all taken into account by ATC when turning aircraft. ATC turns aircraft for efficiency and safety. See response to Recommendation 1.1.f
Feasibility Assessment	See response to Recommendation 1.1.f
Feasibility Justification	See response to Recommendation 1.1.f
Next Steps	Existing FAA requirement - no further FAA action

1.1.h Conduct post-training OSAs on radar separation.	
Adjustment Type	Review
Adjustment Detail	Post-training OSAs
Evaluation	On-the-job training quality control checks are conducted in accordance with FAA Order 7210.634, Chapter 5, Section 2.
Feasibility Assessment	Feasible – existing FAA requirement
Feasibility Justification	Part of the FAA Quality Control Program
Next Steps	Existing FAA requirement - no further FAA action
1.1.i Instruct tower supervisors to not combine sectors at peak traffic periods. [This recommendation was also submitted by Senators Feinstein and Harris in a letter dated May 6, 2020.]	
Adjustment Type	Resource Management
Adjustment Detail	Peak traffic sector management
Evaluation	FAA Order 7210.3, Chapter 2, Section 6, addresses watch supervision requirements, including monitoring and managing traffic volume/flow and position assignments. See response to Recommendation 1.1.b
Feasibility Assessment	Not operationally feasible
Feasibility Justification	Staffing at ATC facilities is structured to ensure the correct amount of resources are available throughout each shift to meet typical traffic demand. Facility watch schedules take into account normal traffic flow, thereby permitting the posting of a continuing schedule for an indefinite period of time. Watch supervisors are required to maintain situational awareness of traffic activity and operational conditions in order to provide timely assistance to ATC and ensure that the available resources are deployed for optimal efficiency. Watch supervisors monitor and, when needed, initiate actions to manage traffic volume/flow through a variety of means. Personnel are already assigned to positions as required by activity, equipment, and facility function, and positions may be consolidated in consideration of activity and the qualifications of the personnel involved.
Next Steps	No further FAA action

1.1.j Monitor Valley Sector for SOP compliance.	
Adjustment Type	Review
Adjustment Detail	SOP compliance
Evaluation	FAA Order 7210.632, Air Traffic Organization Occurrence Reporting, provides compliance monitoring in an internal searchable database. Non-compliance would be immediately identifiable and addressed. Also, controller performance is

	reviewed during quality control monitoring through a quality control OSA. OSAs are conducted in accordance with FAA Order 7210.634, Chapter 2. Quality control monitoring collects technical performance data. This data supports other quality control processes that assess training, procedures, airspace, directives, equipment, and the technical performance of personnel.
Feasibility Assessment	Feasible – existing FAA requirement
Feasibility Justification	Required per SCT SOP 7110.65B para 2-3-1b.(2).
Next Steps	Existing FAA requirement - No further FAA action

1.1.k Conduct training on using northerly airspace between BUR and VNY to gain altitude.	
Adjustment Type	Training
Adjustment Detail	Northerly airspace altitude gain
Evaluation	ATC turns aircraft for efficiency and safety, which does not always equate to minimum separation. Higher terrain and crossing traffic inhibit northerly turns.
Feasibility Assessment	Not operationally feasible
Feasibility Justification	Because the terrain is significantly higher to the north of BUR and VNY, aircraft must be at a higher altitude than south-southwest departures before ATC can vector them. Additionally, turns to the north cannot occur until aircraft are above the MVA, which ranges from 3,000 to 4,300 feet MSL around BUR and VNY. Therefore, aircraft departing to the south have to travel a certain distance to gain this altitude before turning north. Also, departing aircraft must be safely separated from the arrivals to BUR Runway 8, which often prevents ATC from issuing early northbound turns.
Next Steps	No further FAA action

1.1.l Conduct System Service Review (SSR) on SOP compliance and resource management.	
Adjustment Type	Review
Adjustment Detail	SSR on SOP compliance and resource management
Evaluation	See response to Recommendation 1.1.a
Feasibility Assessment	See response to Recommendation 1.1.a
Feasibility Justification	See response to Recommendation 1.1.a
Next Steps	See response to Recommendation 1.1.a

1.1.m Provide refresher training to Tower controllers on proper handoff procedures and impacts of noncompliance.	
Adjustment Type	Training
Adjustment Detail	Training on proper handoff procedures

Evaluation	Handoffs are automated between the towers and SCT. Therefore, there is no need for refresher training. FAA Order 7110.65, 3-9-3.b.1., does instruct a frequency change of aircraft to departure control "at about ½ mile beyond the runway end." However, aircraft are climbing on the issued departure procedure regardless of whether they are on the tower frequency or departure control frequency.
Feasibility Assessment	Not applicable as the procedure is automated.
Feasibility Justification	Not applicable as the procedure is automated.
Next Steps	Not applicable as the procedure is automated.
1.1.n Conduct post-training SSR on handoff procedures.	
Adjustment Type	Review
Adjustment Detail	SSR on handoff procedures
Evaluation	See response to Recommendation 1.1.a
Feasibility Assessment	See response to Recommendation 1.1.a
Feasibility Justification	See response to Recommendation 1.1.a
Next Steps	See response to Recommendation 1.1.a

1.2 [a)] Stop combining ATC sectors, and [b)] ATC handoff of departures to SCT should occur within 1/2 mile of the Runway as per FAA guidelines. [This recommendation was also submitted by Senators Feinstein and Harris in a letter dated May 6, 2020.]	
Adjustment Type	Procedures, Training
Adjustment Detail	Change in procedures, conduct training
Evaluation	a) FAA Order 7210.3, 2-6, addresses watch supervision requirements, including monitoring/managing traffic volume/flow and position assignments. b) FAA Order 7110.65, 3-9-3.b.1., instructs a frequency change of aircraft to departure control "at about ½ mile beyond the runway end."
Feasibility Assessment	Not feasible
Feasibility Justification	a) Staffing at ATC facilities is structured to ensure the correct amount of resources are available throughout each shift to meet typical traffic demand. Facility watch schedules take into account normal traffic flow, thereby permitting the posting of a continuing schedule for an indefinite period of time. Watch supervisors are required to maintain situational awareness of traffic activity and operational conditions in order to provide timely assistance to specialists and ensure that the available resources are deployed for optimal efficiency. Watch supervisors monitor and, when needed, initiate actions to manage traffic volume/flow through a variety of means. Personnel are already assigned to positions as required by activity, equipment, and facility function, and positions may be

	consolidated in consideration of activity and the qualifications of the personnel involved. b) FAA Order 7110.65, 3-9-3.b.1., does instruct a frequency change of aircraft to departure control "at about ½ mile beyond the runway end." However, aircraft are climbing on the issued departure procedure regardless of whether they are on the tower frequency or departure control frequency. Additionally, handoffs are conducted in accordance with Section 6, Paragraph d.(2)(i), of the SCT-BUR LOA dated November 21, 2019.
Next Steps	No further FAA action

1.3 Draft letter of agreement between SCT and BUR ATC that assigns responsibility to BUR ATC to apply visual separation on Runway 15 departures versus Runway 8 arrivals, enabling earlier turns with faster climbs.	
Adjustment Type	Procedures
Adjustment Detail	LOA that BUR will apply visual separation on Runway 15 departures.
Evaluation	Visual separation responsibility is already contained within the existing SCT-BUR LOA, Section 6, Paragraph e.2.(b), dated November 21, 2019. Due to converging course rules, departures cannot be turned sooner until another form of separation is established. Visual separation rules would require the BUR controller to keep control of the departure aircraft until vertical separation is established. Since BUR airspace ends at 2,500 feet above ground level, additional coordination with SCT would increase controller workload.
Feasibility Assessment	Not feasible
Feasibility Justification	An initial divergence of 45° or greater is required from Runway 15 departures and Runway 8 arrivals, in accordance with FAA Order 7110.65, 1-2-2.
Next Steps	No further FAA action

1.4 Since both the southern shift and undue southern concentration of departures appear to be due in part to ATC workforce and related issues, FAA should initiate a system service review and workforce analysis to ensure adequate staffing levels to ensure safety and maximum efficiency.	
Adjustment Type	Review
Adjustment Detail	Conduct SSR
Evaluation	FAA Order 7210.634 requires a continual review of services provided and initiation of SSRs on a regular basis. The intent of an SSR is to review the air traffic services provided in any situation at any time under any circumstances. In accordance with FAA Order

	7210.634, 3-2.e.(2)(h), resource management is already considered as part of the data reviewed in an SSR.
Feasibility Assessment	Feasible – existing FAA requirement
Feasibility Justification	SSRs are conducted in accordance with FAA Order 7210.634, Chapter 3.
Next Steps	Existing FAA requirement - no further FAA action

1.5 In the near-term, improve the hand-off between Air Traffic Control Tower (ATCT) and SCT with additional FAA regulated training.	
Adjustment Type	Training
Adjustment Detail	Handoff training
Evaluation	Aircraft are climbing on the issued departure procedure regardless of whether they are on the tower frequency or departure control frequency. Additionally, handoffs are automated and conducted in accordance with SCT-BUR LOA 6.d.(2)(i). Also, see response to 1.2 above.
Feasibility Assessment	Not applicable
Feasibility Justification	Not applicable
Next Steps	No further FAA action

1.6 In the long-term, aircraft using conventional procedures on Runway 15 should be vectored to the north by ATC before the 101 Freeway when there are no airspace conflicts with doing so.	
Adjustment Type	Track
Adjustment Detail	Vector aircraft north on Runway 15, before the 101 Freeway
Evaluation	It is technically feasible when the climb performance of aircraft allows it to be at or above the MVA prior to the 101 Freeway. This requires aircraft climb gradients in excess of 1,000 feet per NM. ATC vectors aircraft to the north when aircraft meet the lateral and vertical separation requirements with other aircraft and when workload permits.
Feasibility Assessment	Not applicable.
Feasibility Justification	Departure turns to the north are dependent on a variety of factors, such as aircraft capabilities, pilot training, weather, wind, and traffic volume. Vectors cannot be issued until aircraft are at or above the MVA and all traffic conflicts have been resolved.
Next Steps	No further FAA action

1.7 In the near-term, improve the hand-off between Air Traffic Control Tower (ATCT) and SCT with additional FAA regulated training.

Adjustment Type	Training
Adjustment Detail	Improve handoffs between the tower and SCT
Evaluation	See response to Recommendation 1.5
Feasibility Assessment	Not applicable
Feasibility Justification	Not applicable
Next Steps	No further FAA action

2.1 Change RNAVs/procedures to encourage earlier turns of departing flights and allow a greater percentage of the departing flight tracks to be over the uninhabited Sepulveda Basin (e.g., FAA should discontinue use of PPRRY at VNY and expedite turns by returning to 2.2 DME).	
Adjustment Type	Track
Adjustment Detail	Change departure procedures
Evaluation	RNAV and conventional instructions (turning at 2.2 DME) cannot be mixed on the same procedure per criteria. The FAA designed a notional procedure that simulates this turn as closely as possible, and presented it to the Van Nuys Citizens Advisory Council on August 6, 2019 (see Recommendation 2). The Council did not ask the FAA to proceed with the design.
Feasibility Assessment	Technically feasible
Feasibility Justification	See response to Recommendation 2
Next Steps	No further FAA action

2.2 In the near-term for aircraft using conventional procedures on Runway 16, they should be vectored to the North by ATC before the 101 Freeway when there are no airspace conflicts in doing so.	
Adjustment Type	Track
Adjustment Detail	Vector aircraft departing Runway 16 to the north by the 101 Freeway
Evaluation	It is technically feasible when the climb performance of aircraft allows it to be at or above the MVA prior to the 101 Freeway. This requires aircraft climb rates in excess of 1,000 feet per NM. ATC routinely vector aircraft to the north when aircraft meet the lateral and vertical separation requirements.
Feasibility Assessment	Not applicable
Feasibility Justification	Departure turns to the north are dependent on a variety of factors, such as aircraft capabilities, pilot training, weather, wind, and traffic volume. Vectors cannot be issued until aircraft are at or above the MVA and all traffic conflictions have been resolved.
Next Steps	No further FAA action

2.3 In the long-term for aircraft using conventional procedures on Runway 16, they should be vectored to the north by ATC before the 101 Freeway when there are no airspace conflicts in doing so.	
Adjustment Type	Track
Adjustment Detail	Vector aircraft on Runway 16 to the north before the 101 Freeway
Evaluation	See responses to Recommendations 1.6 and 2.2
Feasibility Assessment	See responses to Recommendations 1.6 and 2.2
Feasibility Justification	See responses to Recommendations 1.6 and 2.2
Next Steps	No further FAA action

2.4 In the near-term for departures using Runway 16R, replace PPRRY in all RNAV procedures by returning to 2.2 DME.	
Adjustment Type	Track
Adjustment Detail	Cancel and replace RNAV procedures
Evaluation	RNAV and conventional instructions (turning at 2.2 DME) cannot be mixed on the same procedure per FAA criteria.
Feasibility Assessment	Not operationally feasible
Feasibility Justification	See response to Recommendation 2.1
Next Steps	No further FAA action

2.5 Eliminate the PPRRY waypoint and publish an open waypoint placed south of the airport runway near Victory Boulevard and the top of the Sepulveda Basin. An open waypoint will help with dispersion so no one community bears the brunt of aircraft flight tracks.	
Adjustment Type	Waypoint
Adjustment Detail	Eliminate and replace waypoint
Evaluation	"Open waypoint" is not a defined term for flight procedures. The RNAV departures at VNY are currently designed as open SIDs, and the PPRRY waypoint is located at the earliest location to place a waypoint and meet criteria in accordance with FAA Order 8260.58, Appendix B.
Feasibility Assessment	Not technically feasible
Feasibility Justification	The PPRRY waypoint is located at the earliest location to place a waypoint and meet criteria.
Next Steps	No further FAA action

2.6 In the near-term, improve the hand-off between ATCT and SCT with additional FAA regulated training.

Adjustment Type	Training
Adjustment Detail	Additional handoff training
Evaluation	Handoffs are conducted in accordance with FAA Order 7110.65, 3-9-3.b.1, which instructs a frequency change of aircraft from the tower frequency to departure control frequency "at about ½ mile beyond the runway end." Aircraft are climbing on the issued departure procedure regardless of whether they are on the tower frequency or changed to the departure control frequency. Additionally, handoffs are automated and conducted in accordance with SCT-BUR LOA 6.d.(2)(i).
Feasibility Assessment	Not applicable
Feasibility Justification	Not applicable
Next Steps	No further FAA action

3.1 Mandate procedures that require airlines to use higher climb rates.	
Adjustment Type	Aircraft Performance
Adjustment Detail	Higher climb rates
Evaluation	See response to Recommendation 3
Feasibility Assessment	See response to Recommendation 3
Feasibility Justification	See response to Recommendation 3
Next Steps	See response to Recommendation 3
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA*, 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. Such a determination under the grant assurances as to whether an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the PIC authority and safety of flight. See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

3.2 Incorporate steeper minimum takeoff climb gradients at both to a minimum of 600 ft per nautical mile, or the closest rate to this that falls within safety guidelines, to help mitigate

ground-level noise and concentrated jet exhaust particulate and request the FAA, LAWA, VNY, and BUR to work with and encourage pilots and air carriers to use the steepest departure profiles their aircraft can safely undertake.	
Adjustment Type	Aircraft Performance
Adjustment Detail	Steeper minimum takeoff climb gradient
Evaluation	See responses to Recommendations 2 and 3
Feasibility Assessment	See responses to Recommendations 2 and 3
Feasibility Justification	See responses to Recommendations 2 and 3
Next Steps	See responses to Recommendations 2 and 3
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA*, 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. Such a determination under the grant assurances as to whether an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the PIC authority and safety of flight . See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

3.3 Increase the climb gradient on all departures at both, or on as many procedures and as many aircraft types as possible, and grant waiver for gradients above 500 feet per nautical mile.	
Adjustment Type	Aircraft Performance
Adjustment Detail	Increase climb gradients
Evaluation	See responses to Recommendations 2 and 3
Feasibility Assessment	See responses to Recommendations 2 and 3
Feasibility Justification	See responses to Recommendations 2 and 3
Next Steps	See responses to Recommendations 2 and 3
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb

	gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA*, 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. Such a determination under the grant assurances as to whether an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the PIC authority and safety of flight. See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

3.4 In the near-term and long-term, increase the minimum climb gradients for all procedures; and/or encourage pilots/airlines to use steeper departure profiles at both.	
Adjustment Type	Aircraft Performance
Adjustment Detail	Increase minimum climb gradients
Evaluation	See responses to Recommendations 2 and 3
Feasibility Assessment	See responses to Recommendations 2 and 3
Feasibility Justification	See responses to Recommendations 2 and 3
Next Steps	See responses to Recommendations 2 and 3
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA*, 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. Such a determination under the grant assurances as to whether an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the PIC authority and safety of flight. See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

3.5 Because a more rapid rate of ascent would likely reduce noise impacts in all communities, adopt rules, procedures and/or ATC instructions that encourage pilots to increase altitude as rapidly as is safe when departing, including establishing altitude gates.	
Adjustment Type	Aircraft Performance
Adjustment Detail	Increase altitude as rapidly as is safe
Evaluation	If procedural climb gradients are increased beyond the rate aircraft are currently climbing (non-piston aircraft generally climb at or above 500 feet per NM), the higher thrust required might increase noise in the immediate area around the airport. Per FAA Orders 8260.3 and 8260.58 criteria, climb gradients in excess of 500 feet per NM are nonstandard and require the FAA's Office of Flights Standards (AFS) approval. If AFS approval is given, the climb gradients would be published as crossing altitudes/gates since they would not be driven by obstacles. Pilots would have the prerogative to reject them and climb at only that rate required for obstacles. We analyzed two weeks of departure climb data from BUR for the Boeing 737 family of aircraft and Airbus 320 family of aircraft used by scheduled air carriers at BUR. We found the average climb gradient was approximately 1,019 feet per NM for Boeing 737 aircraft and 1,075 feet per NM for Airbus 320 aircraft. Since aircraft that can make a climb rate greater than 500 feet per NM already appear to do so, and aircraft that cannot will reject the crossing altitude/gate, making this change is unlikely to produce any change in aircraft profiles from existing procedures.
Feasibility Assessment	Technically feasible (LT) pending AFS approval Financial feasibility to be determined
Feasibility Justification	AFS approval would be needed. Due to the large number of aircraft already climbing at a higher rate, we determined that it would be operationally feasible.
Next Steps	Airport authorities to submit IFP Information Gateway request; however, we note that making this change is unlikely to produce any change in aircraft profiles from existing procedures.
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA*, 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft

	at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. Such a determination under the grant assurances as to whether an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the PIC authority and safety of flight. See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

3.6 The February 2017 letter of agreement between SCT and BUR ATC assigns all departures 4,000' MSL. If that agreement has the impact of preventing increase in climb, it should be changed.	
Adjustment Type	Procedures
Adjustment Detail	Change the LOA between SCT and BUR
Evaluation	4,000 feet MSL is used to procedurally vertically separate BUR departures from other air traffic in the vicinity.
Feasibility Assessment	Not operationally feasible
Feasibility Justification	4,000 feet MSL is the lowest initial climb altitude due to the MVA. (MVAs are the lowest MSL altitude at which an IFR aircraft will be vectored by a radar controller. The altitude meets IFR obstacle clearance criteria.) This altitude (4,000 feet MSL) is also used to provide separation from traffic transitioning eastbound and westbound on a route called V-186 at 5,000/6,000/7,000/8,000/ 9,000/10,000/11,000/12,000 feet MSL.
Next Steps	No further FAA action
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA*, 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. Such a determination under the grant assurances as to whether an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There

	are concerns with regard to safety and a potential conflict with the PIC authority and safety of flight. See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

4.1 Study the ability to encourage or require aircraft to ascend more rapidly through the use of voluntary noise abatement procedures and/or increasing the minimum climb over distance contained in the standard instrument departure procedures.	
Adjustment Type	Procedures
Adjustment Detail	Noise abatement procedures
Evaluation	See response to Recommendation 4
Feasibility Assessment	See response to Recommendation 4
Feasibility Justification	See response to Recommendation 4
Next Steps	See response to Recommendation 4
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA*, 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. Such a determination under the grant assurances as to whether an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the PIC authority and safety of flight. See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

4.2 Conduct a technical analysis to establish new altitude rules for when aircraft arrive or depart over higher altitude topography with the goal of ensuring that planes ascend higher if they must fly over higher altitude areas. For example, if a plane's departure route over sea level would normally have it as 4,000 feet one mile from the airport, then the departure route over terrain of a 1,000 feet of elevation, would require that the aircraft ascend to 5,000 feet at the same distance.	
Adjustment Type	Review
Adjustment Detail	Technical analysis to account for topography in establishing altitudes

Evaluation	A technical analysis can be conducted to determine if departure criteria could be altered to increase minimum and maximum allowable climb gradients. AFS continuously re-evaluates criteria for optimization and safety. Current criteria includes the option to increase a climb gradient for terrain and obstructions up to 500 feet per NM. Climb gradients greater than this require AFS approval due to safety.
Feasibility Assessment	Not operationally feasible
Feasibility Justification	Due to air density and aircraft performance, aircraft cannot climb as quickly at higher altitudes. It is not operationally feasible to require aircraft to climb steeper in these situations.
Next Steps	No further FAA action
Additional FAA Response	This recommendation may economically discriminate against air carriers and operators at the airport in violation of FAA Grant Assurance 22 because air carriers and operators currently operating aircraft at the airport might not be able to meet the requested climb gradient. An airport proprietor is primarily liable for aircraft noise in the vicinity of an airport. *Griggs v. County of Allegheny, PA,* 369 U.S. 84 (1962). Because it is primarily liable for aircraft noise, an airport proprietor is permitted to impose some regulation of aircraft at the airport. This is called the proprietor exception. Under its proprietor exception, an airport proprietor may impose airport use restrictions that do not unjustly discriminate against a particular type of aviation activity, do not impede safety and the management of the airspace, and do not unreasonable interfere with interstate or foreign commerce. Such a determination under the grant assurances as to whether an access restriction is reasonable will consider the safety, since a restriction that is unsafe is also unreasonable. There are concerns with regard to safety and a potential conflict with the PIC authority and safety of flight. See FAA 2014 LAX Part 161 decision effective November 7, 2014, 79 FR 70267.

5.1 Regardless of the determination made by the Environmental Assessment (EA) to be conducted on the proposed amendments to incorporate the JAYTE and TEGAN waypoints into the SLAPP and OROSZ standard instrument departure procedures, the Task Force recommends not amending the procedures to implement the use of waypoints.	
Adjustment Type	Waypoint
Adjustment Detail	Decline to incorporate JAYTE and TEGAN waypoints
Evaluation	This would require no action, and the use of the procedure that is currently published.
Feasibility Assessment	Feasible (ST)
Feasibility Justification	No operational impact

Next Steps	The No Action alternative will be considered in the ongoing BUR EA.

5.2 Proposed procedures SLAPP [THREE] and OROSZ THREE should be rejected as written and reconsidered to ensure maximize noise reduction and safety for all communities and FAA-recognized noise-sensitive areas of the San Fernando Valley, without regard to any previous litigation settlement agreements, and they must not impose significant new impacts on new communities compared to pre-2017 conditions.	
Adjustment Type	Track
Adjustment Detail	Reject and reconsider proposed SLAPP THREE and OROSZ THREE
Evaluation	The FAA has already begun preparing an environmental assessment for the proposed SLAPP THREE and OROSZ THREE amendments (also referred to as the proposed action). As part of the environmental assessment of the proposed action, the FAA will consider reasonable alternatives, **including consideration of adjusting the originally proposed procedures.** The purpose and need of the proposed project includes designing and implementing flight procedures which are operationally efficient and safe while considering the local communities' overflight concerns to the greatest extent possible. Neither NEPA nor other applicable federal noise statutes require the FAA to "maximize noise reduction." Nonetheless, the EA will analyze the potential environmental effects of the proposed action and reasonable alternatives. The FAA's environmental review must comply with NEPA and the FAA's policies and procedures implementing NEPA (FAA Order 1050.1F). NEPA requires a federal agency to compare environmental consequences using existing conditions between the proposed action and the no action alternative at the very minimum. Here, the no action alternative comprises of the current SLAPP ONE and OROSZ TWO RNAV departure procedures; not pre-2017 conditions.
Feasibility Assessment	Will be assessed in the EA
Feasibility Justification	Not applicable
Next Steps	The FAA proceeds with the EA process that includes considering alternatives and the feasibility of dispersal headings or other lateral track variations.

5.3 If the proposed procedures SLAPP [THREE] and OROSZ THREE must be used at all, all waypoints should be considered "fly-by" and NOT "fly-over" in order to reduce exact uniformity and encourage delay in pilots' use of autopilot on departures.	

Adjustment Type	Waypoint
Adjustment Detail	"Fly-by" and not "fly-over"
Evaluation	Fixes on the proposed SLAPP THREE and OROSZ THREE, south of the airport, are fly-by waypoints except for TEAGN.
Feasibility Assessment	Feasible (ST)
Feasibility Justification	Changing the proposed TEAGN waypoint to a fly-by waypoint could be done but, since no procedural turn occurs at TEAGN, the aircraft will perform the same regardless of waypoint designation.
Next Steps	Fly-by waypoints already part of procedures in the EA

5.4 Discontinue use of JAYTE and TEAGN waypoints in all departure and arrival procedures.

Adjustment Type	Waypoint
Adjustment Detail	Discontinue JAYTE and TEAGN
Evaluation	These waypoints are not currently in use. They are proposed in the amendments to the SLAPP and OROSZ departure procedures that are currently being analyzed in the ongoing BUR EA.
Feasibility Assessment	Not applicable
Feasibility Justification	The waypoints are not currently in use.
Next Steps	No further FAA action

5.5 If JAYTE and TEAGN must be used at all, they should be placed at locations that will maximize noise reduction and safety for all communities and FAA-recognized noise-sensitive areas of the San Fernando Valley, without regard to any previous litigation settlement agreements, and they must not impose significant new impacts on new communities compared to pre-2017 conditions.

Adjustment Type	Waypoint
Adjustment Detail	Relocate JAYTE and TEAGN to maximize noise reduction.
Evaluation	Waypoints JAYTE and TEGAN cannot be positioned to provide noise reduction for all communities. Movement of a waypoint position would shift the noise footprint to different communities.
Feasibility Assessment	It is not technically feasible to move JAYTE and TEAGN without shifting noise.
Feasibility Justification	Not able to reduce noise for all communities
Next Steps	No further FAA action

5.6 In the near-term, change the initial departure headings for OROSZ, SLAPP, and the conventional procedures so that they better disperse the early part of the flight tracks.

Adjustment Type	Track
Adjustment Detail	Change initial departure headings

Evaluation	The FAA has already begun preparing an environmental assessment for the proposed SLAPP THREE and OROSZ THREE amendments (also referred to as the proposed action). As part of the environmental assessment of the proposed action, the FAA will consider reasonable alternatives, including consideration of adjusting the originally proposed procedures. The purpose and need of the proposed project includes designing and implementing flight procedures which are operationally efficient and safe while considering the local communities' overflight concerns to the greatest extent possible. Neither NEPA nor other applicable federal noise statutes require the FAA to "maximize noise reduction." Nonetheless, the EA will analyze the potential environmental effects of the proposed action and reasonable alternatives. The FAA's environmental review must comply with NEPA and the FAA's policies and procedures implementing NEPA (FAA Order 1050.1F). NEPA requires a federal agency to compare environmental consequences using existing conditions between the proposed action and the no action alternative at the very minimum. Here, the no action alternative comprises of the current SLAPP ONE and OROSZ TWO RNAV departure procedures; not pre-2017 conditions. We are also considering the feasibility of dispersal headings or other lateral track variations during the EA process for the proposed SLAPP THREE and OROSZ THREE procedures, as requested by the Burbank-Glendale-Pasadena Airport Authority. Any dispersion of aircraft departing on Runway 15 would have to occur to the south and east of a 213° initial heading, because of the requirements for separating Runway 15 departures from Runway 8 arrivals. Any headings farther north of this would not provide the required 45° separation per FAA Order 7110.65, 1-2-2. In order to disperse aircraft, headings south of 213° would have to be used for the aircraft to gain altitude before turning to the north. The resultant flight paths would likely be farther south than those currently flown.
Feasibility Assessment	Will be assessed in EA
Feasibility Justification	Not applicable
Next Steps	The FAA proceeds with the EA process that includes considering alternatives and the feasibility of dispersal headings or other lateral track variations.

6.1 Develop multiple waypoints and headings, whether RNAV or conventional, to create flight track dispersion for each departure direction from both. If this is not possible, request the FAA to design and implement the closest approximation to this goal to disperse flight tracks.	
Adjustment Type	Track, Waypoint
Adjustment Detail	Develop multiple waypoints and headings to create dispersion
Evaluation	FAA Order 8260.58 (Chapter 5) safety criteria do not allow multiple runway transitions (initial departure routes) on the same procedure. Additional waypoints could only be added at higher altitudes. The closest approximation is a radar vector SID, which the SLAPP and OROSZ departures procedures currently employ.
Feasibility Assessment	It is not technically feasible to develop multiple waypoints and headings to create dispersion close to the airport; the current design of the SLAPP ONE and OROSZ TWO (as radar vector SIDs) provides the closest approximation to the goal of dispersing flight tracks.
Feasibility Justification	FAA criteria do not allow multiple runway transitions (initial departure routes) on the same procedure.
Next Steps	No further FAA action

6.2 Redesign RNAV arrival and departure procedures so that they mimic pre-Metroplex conventional dispersed procedures. During the technical review to complete this, suspend RNAV procedures and fly pre-Metroplex conventional procedures.	
Adjustment Type	Track
Adjustment Detail	Redesign RNAV to mimic conventional procedures
Evaluation	RNAV procedures are already designed to mimic the conventional procedures as closely as possible. The FAA is modernizing the National Airspace System and is committed to moving to satellite based navigation, known as PBN. This is consistent with Congressional direction and necessitated by growth in the system, which by itself affects a community's perception of noise unrelated to airspace modernization. The FAA is studying ways to use PBN technology to create systematic dispersal of flight tracks while maintaining safety and efficiency. It is important to understand, however, that it is not possible to replicate the kind of random dispersal that occurs when planes are flying using ground based navigation—in other words, introducing systematic dispersal using satellite based routes would not achieve the outcome of "going back to the way it was." That type of

	random dispersal is no longer possible. There are no applicable concepts for arrivals or departures that eliminate noise; in general, they only move noise. This underscores the importance of clear communication with the communities that would get additional noise based on any given dispersion concept. Returning to conventional procedures would also impact operations at other facilities. While we understand community concerns about departures in close proximity to BUR and VNY, these RNAV procedures are designed to fly hundreds of miles and transition from terminal to en route airspace, and vice versa.
Feasibility Assessment	Not technically feasible
Feasibility Justification	The procedures exist as requested
Next Steps	No further FAA action

6.3 Implement "open" procedures where possible and avoid "closed" procedures wherever technically feasible to limit the creation of narrow flight paths.	
Adjustment Type	Track
Adjustment Detail	Limit narrow flight paths
Evaluation	There are three types of departures. An open departure begins with a defined RNAV route, has an "open" portion in the middle where ATC vectors aircraft, and then ends with a defined RNAV route. A standard departure has a defined RNAV route throughout the procedure. A radar vector departure begins with ATC vectoring aircraft and ends either with a defined RNAV route or in the higher-altitude, en route environment. We could implement an open departure concept (the proposed SLAPP THREE and OROSZ THREE are open departures), but open or standard departures limit aircraft dispersion at lower altitudes. The existing SLAPP ONE and OROSZ TWO are radar vector departures and allow for the maximum dispersion of aircraft.
Feasibility Assessment	Not applicable
Feasibility Justification	The proposed SLAPP THREE and OROSZ THREE are open SIDs that limit dispersion at lower altitudes, and the existing SLAPP ONE and OROSZ TWO are radar vector SIDs that allow for maximum dispersion of aircraft. Both are under consideration in the ongoing EA.
Next Steps	The FAA proceeds with the EA process that includes considering alternatives and the feasibility of dispersal headings or other lateral track variations.

6.4 Increase utilization of alternative departure headings on Runway 15 to achieve greater dispersal.

Adjustment Type	Track
Adjustment Detail	Alternative departure headings
Evaluation	See Recommendation 5.6.
Feasibility Assessment	Operationally feasible (ST) Financial feasibility to be determined.
Feasibility Justification	Based on the requirements for separating BUR Runway 15 departures from BUR Runway 8 arrivals, any dispersion of aircraft departing on Runway 15 would have to occur to the south and east of a 213° initial heading. Headings of 180°, 195°, and 210° could potentially be used to provide dispersion. The resultant flight paths would likely be farther south than those currently flown.
Next Steps	The FAA proceeds with the EA process that includes considering alternatives and the feasibility of dispersal headings or other lateral track variations.

6.5 Utilize open Standard Instrument Departure (SID) procedures, at lower minimum vector altitude.	
Adjustment Type	Track
Adjustment Detail	SID altitude
Evaluation	Lowering the MVAs is not operationally feasible due to safety concerns. See also the response to Recommendation 6.3 for open SID definitions. MVA charts are prepared in accordance with FAA Order 7210.3, 3-8-2, and are reviewed biannually. Also, aeronautical charts must be revised immediately when changes affecting MVAs occur. The MVA charts at SCT have been refined to their most efficient and effective design in accordance with all directives.
Feasibility Assessment	Not technically feasible
Feasibility Justification	Not in accordance with FAA safety directives
Next Steps	No further FAA action

6.6 Utilize Diverse Vector Area (DVA) (see, e.g., FAA Order 7110.65).	
Adjustment Type	Track
Adjustment Detail	Change local procedure
Evaluation	All BUR and VNY RNAV departure procedures are open SIDs or contain vectors in their initial segments.
Feasibility Assessment	Not operationally feasible

Feasibility Justification	See Recommendation 6 (b) response
Next Steps	No further FAA action

6.7 FAA should integrate a small range of automated randomization into Air Traffic Control (ATC) software guiding the turn instructions for departures in order to produce more dispersal.	
Adjustment Type	Procedures
Adjustment Detail	ATC software to produce dispersal
Evaluation	The FAA's Office of Environment and Energy is currently studying dispersion off the end of the runway. ATC makes decisions about aircraft separation based on numerous factors including traffic, weather, and aircraft performance. ATC uses automation to provide navigation, surveillance, and safety alerts.
Feasibility Assessment	Not technically feasible
Feasibility Justification	Not applicable
Next Steps	No further FAA action

7.1 Request that the FAA publish instrument approaches for Runways 15, 33, and 26.	
Adjustment Type	Procedures
Adjustment Detail	Publish instrument approaches
Evaluation	Due to design criteria and terrain, public instrument approaches are not feasible to BUR runways other than Runway 8. Approach procedures to Runway 15, 33, or 26 would not be feasible because the rapidly rising terrain forces a descent gradient above the maximum allowed by criteria per FAA Orders 8260.58 and 8260.3.
Feasibility Assessment	Not technically feasible
Feasibility Justification	Current instrument procedures allow aircraft to circle to other runways in visual conditions. Additionally, VFR aircraft can land on other runways. However, due to higher terrain to the north, east, and south, straight-in procedures to Runways 15, 26, and 33 cannot be constructed without exceeding maximum descent gradient criteria, in accordance with FAA Order 8260.58 and FAA Order 8260.3.
Next Steps	No further FAA action

8.1 Increase utilization of the existing ELMOO NINE departure procedure from Runway 15 by, among other things: (a) establishing ELMOO NINE as an RNAV procedure to conform its utilization with NextGen implementation; and (b) creating an enforceable requirement to encourage FAA to increase use of ELMOO NINE, such as constraining all other departure procedures to reduce their volume to their pre-2009 levels.	
Adjustment Type	Track
Adjustment Detail	Increase the use of ELMOO NINE, make it an RNAV, and make using it a requirement.
Evaluation	a) An RNAV flight procedure that mirrors the ELMOO NINE can be developed. b) The ELMOO NINE is generally used by smaller, non-jet aircraft. Forcing ATC to increase its use would result in jets being restricted to 6,000 feet MSL, due to the overlaying Class B airspace.
Feasibility Assessment	a) Not operationally feasible b) Not operationally feasible
Feasibility Justification	The basic design of airspace in the LA Basin enables departing aircraft to use appropriate runways based on aircraft weight and performance, and environmental factors including wind, weather, and visibility. The area southeast of BUR is constrained by Los Angeles Class B airspace to the south and mountainous terrain to the east-northeast. There are numerous VFR Flyways in the area and V-186/597 is a primary IFR Class B avoidance route. The ELMOO SID is primarily used by smaller, non-jet aircraft to transition from the San Fernando Valley to the Inland Empire area. Aircraft utilizing this routing are generally restricted to 6,000 feet MSL or below to avoid conflict with the large, fast-moving passenger jets within Los Angeles Class B airspace. Jets departing on the ELMOO SID would face similar altitude restrictions as their non-jet counterparts. Aircraft with destinations west through north would be on a course proceeding away (50–100+ miles) from their destination, potentially to the TRM intersection (near Thermal, California) and beyond. Aircraft with destinations northeast through southeast would also be held to lower altitudes for longer periods in order to safely transition into the en route environment. These jets would likely be routed via V-186 to V-64 to TRM being held down at 5,000 feet MSL until the PDZ intersection (near Riverside, California), then up to 13,000 feet MSL on V-64. These aircraft flying at lower altitudes for longer periods would increase fuel emissions and noise in those areas.

	Since the Cerritos midair collision thirty-four years ago, the FAA and aviation industry jointly developed TCAS while the FAA expanded the LAX Class B airspace to enhance safety in the greater Los Angeles area. Introducing BUR jets into this environment would threaten the established layers of safety as the mix of traffic (VFR, IFR jets, and IFR non-jets) would require extra controller vigilance, add traffic confliction points, increase the number of traffic calls, and create overtake situations between aircraft.
Next Steps	No further FAA action

8.2 In the long-term for RNAV departures with destinations to the east and northeast when Runway 15 is used, [a)] it is recommended that a new RNAV procedure be established similar to ELMOO NINE conventional procedure that sends aircraft east through the San Gabriel Valley. [b)] If an eastern departure routing is not feasible, the SLAPP concept proposed by Advocates for Viable Airport Solutions to the west and then north is proposed instead.	
Adjustment Type	Procedure
Adjustment Detail	New RNAV procedure
Evaluation	a) It is technically possible to develop an RNAV flight procedure that mirrors the ELMOO NINE. b) While technically feasible, the SLAPP concept presented by the Advocates for Viable Airport Solutions positions the aircraft less than the required 3 NM away from the Runway 8 final approach, limiting the ability to conduct simultaneous arrival and departure operations.
Feasibility Assessment	a) Not operationally feasible b) Not operationally feasible
Feasibility Justification	a) See response to Recommendation 8.1 b) Does not have the required lateral separation from Runway 8 final to preclude opposite direction operations.
Next Steps	No further FAA action

8.3 Support recommendations that will provide relief from airplane noise for all residents of the San Fernando Valley. This includes upgrading technology so that flights leaving BUR can utilize the ELMOO NINE route.	
Adjustment Type	General Improvements
Adjustment Detail	Not enough detail
Evaluation	There is not enough information included in this recommendation to determine whether it is feasible (technically, operationally, financially, and/or environmentally) for any defined procedure

	proposal to reduce noise for all residents. A reduction in noise for some residents will likely result in an increase in noise for others.
Feasibility Assessment	A more detailed recommendation is needed.
Feasibility Justification	A more detailed recommendation is needed.
Next Steps	No further FAA action

9.1 Support Congressional legislation imposing a mandatory nighttime curfew at each airport similar to the Authority's Part 161 curfew request submitted on February 2, 2009 and denied by the FAA.	
Evaluation	Non-FAA response required.
Additional FAA Response	The FAA respectfully points out that its determination on the 2009 Part 161 (See FAA 2009 BUR Part 161 decision effective October 30, 2009, 74 FR 66397) request was based on the statutory requirements set forth in 49 U.S.C. Chapter 475. The FAA will not take a public position on a legislative proposal that would change or limit the applicability of those provisions.

9.2 In effort to decrease the total volume of late-night flights (which cause particularly egregious disruption), the FAA should authorize a mandatory curfew at both between the hours of 10 pm and 7 am. This curfew should apply to all non-emergency operations and it should be enforced with fines for violators.	
Evaluation	Non-FAA response required.
Adjustment Type	New Noise Rule
Adjustment Detail	Title 14, Code of Federal Regulations (C.F.R) Part 161, *Notice and Approval of Airport Noise and Access Restrictions*.
Evaluation	FAA does not have the statutory authority to implement or enforce an airport sponsor's local noise rules. The Sponsor would have to submit a request to the FAA pursuant to 14 C.F.R. Part 161.
Preliminary Assessment	It would be premature for the FAA to render any kind of judgment.
Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless BGPAA pursues and receives FAA approval to implement nighttime curfew.
Additional FAA Response	FAA does not have the statutory authority to implement or enforce an airport sponsor's local noise rules. Should the BGPAA wish to pursue a mandatory curfew at BUR, it must follow 14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access*

	Restrictions. Should this occur, FAA will consider the request and provide a formal determination after review of the proposal. A noise or access restriction on the operation of stage 3 aircraft is only allowed in 3 circumstances:1. FAA approves it after an airport sponsor applies for such approval. The procedures and substantive standard governing FAA's reviewing and approval, if applicable, are provided for in 14 CFR part 161. 2. The restriction is pre-existing and meets the grandfather criteria under ANCA. 3. The restriction is passed with the unanimous consent of the sponsor and all aircraft operators.

9.3 Adopt new legislation prohibiting operations between 10 pm and 7 am.	
Evaluation	Non-FAA response required.
Adjustment Type	Change Noise Rule
Adjustment Detail	14 C.F.R. Part 161 *Notice and Approval of Airport Noise and Access Restrictions*.
Evaluation	It is unclear who would adopt the new legislation. Proposed local restrictions must comply with 14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions*. ANCA limits the ability of airport sponsors to implement new restrictions or fines on aircraft operating into or out of their airport after 1990.
Preliminary Assessment	It would be premature for the FAA to render any kind of judgment.
Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless BGPAA pursues and receives FAA approval to implement nighttime curfew.
Additional FAA Response	Only the United States Congress has the authority to enact legislation that limits or otherwise affects access to U.S. airspace.

9.4 Noise guidelines should be implemented on both commercial and general aviation operators (using John Wayne Airport penalties as a model).	
Evaluation	Non-FAA response required.
Adjustment Type	Change Noise Rule
Adjustment Detail	14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions*.

Evaluation	John Wayne Airport's (SNA) noise rules were grandfathered prior to the implementation of ANCA (https://www.ocair.com/aboutjwa/accessandnoise/). The SNA Access Plan places restrictions on operational capacity, hours of operations, and noise levels at the County's ten (10) noise-monitoring stations. General Aviation operations are permitted 24 hours daily subject to compliance with the daytime noise limits and the more restrictive curfew noise limits, as documented in the General Aviation Noise Ordinance (emphasis added). Proposed local restrictions must comply with 14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions.* ANCA limits the ability of airport sponsors to implement new restrictions or fines on aircraft operating into or out of their airport after 1990.
Preliminary Assessment	It would be premature for the FAA to render any kind of judgment.
Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless BGPAA pursues a Part 161 process.
Additional FAA Response	John Wayne Airport's noise rules were grandfathered under ANCA. ANCA limits the ability of airport sponsors to adopt new restrictions or fines on aircraft operating into or out of their airport after 1990.

9.5 The FAA should look at the impact and feasibility of curfews for all airports in the San Fernando Valley.	
Adjustment Type	Implement Noise Rules
Adjustment Detail	14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions*.
Evaluation	Proposed local restrictions must comply with 14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions.* ANCA limits the ability of airport sponsors to implement new restrictions or fines on aircraft operating into or out of their airport after 1990.
Preliminary Assessment	San Fernando Valley airports are owned by multiple airport sponsors. Van Nuys (LAWA), BUR (Burbank-Glendale-Pasadena Airport Authority), and Whiteman Airport (Los Angeles County). No further FAA action unless an airport sponsor pursues and receives FAA approval to implement nighttime curfew.

Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless an airport sponsor pursues and receives FAA approval to implement nighttime curfew.
Additional FAA Response	San Fernando Valley airports are owned by multiple airport sponsors - Van Nuys (LAWA), BUR (Burbank-Glendale-Pasadena Airport Authority) and Whiteman Airport (Los Angeles County). FAA's role under this recommendation would be limited to reviewing noise restrictions proposed by airport sponsors, pursuant to 14 C.F.R. Part 161. Under Part 161, FAA must approve any restriction proposed. The approval must be based upon the criteria established in the regulation. The statute also allows for restrictions that are not approved by the FAA if they are enacted with unanimous consent of the sponsor and all aircraft operators as provided for in the statute. A noise or access restriction on the operation of stage 3 aircraft is only allowed in 3 circumstances: 1. FAA approves it after an airport sponsor applies for such approval. The procedures and substantive standard governing FAA's reviewing and approval, if applicable, are provided for in 14 CFR part 161. 2. The restriction is pre-existing and meets the grandfather criteria under ANCA. 3. The restriction is passed with the unanimous consent of the sponsor and all aircraft operators.

9.6 A new Part 161 study should be initiated to provide for a mandatory curfew, with the full understanding that the position taken by surrounding communities regarding a replacement terminal may well depend on whether a mandatory curfew and other effective noise impact reduction strategies are in place.	
Adjustment Type	Implement Noise Rules
Adjustment Detail	14 C.F.R Part 161, *Notice and Approval of Airport Noise and Access Restrictions*.
Evaluation	Proposed local restrictions must comply with 14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions.* ANCA limits the ability of airport sponsors to implement new restrictions or fines on aircraft operating into or out of their airport after 1990.
Preliminary Assessment	It would be premature for the FAA to render any kind of judgment. However, other effective noise impact reduction strategies may not entirely be possible since LA Council District 2 and 6 are providing

	contradictory requests concerning southerly and northerly departures.
Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless the airport sponsor pursues a Part 161 process
Additional FAA Response	Any airport that wishes to pursue a mandatory curfew must follow 14 C.F.R. Part 161, Notice and Approval of Airport Noise and Access Restrictions. Should this occur, FAA will consider the request and provide a formal determination after review of the proposal.

9.7 Request Los Angeles World Airports (LAWA) implement a nighttime curfew for departures and arrivals of all aircraft to help mitigate community noise disturbances between 10 pm and 7 am on weekdays and 10 pm to 9 am on weekends and to be enforced in part by publishing the names of the aircraft management companies responsible and contact information for complaints to be directed to as well as the tail numbers and any other publicly available information related to the offending flight, pilots, and company or individual who owns or rents the aircraft.	
Evaluation	Non-FAA response required.
Adjustment Type	Modification of LAWA's Noise Rules
Adjustment Detail	14 C.F.R. Part 161 Notice and Approval of Airport Noise and Access Restrictions Study.
Evaluation	It is unclear if the request is for VNY and Los Angeles International Airport (LAX) since LAWA owns and operates both airports. Proposed local restrictions must comply with 14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions*. ANCA limits the ability of airport sponsors to implement new restrictions or fines on aircraft operating into or out of their airport after 1990.
Preliminary Assessment	It would be premature for the FAA to render any kind of judgment.
Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless LAWA pursues and receives FAA approval to implement nighttime curfew.
Additional FAA Response	Any airport that wishes to pursue a mandatory curfew must follow 14 C.F.R. Part 161, Notice and Approval of Airport Noise and Access Restrictions. Should this occur, FAA will consider the

	request and provide a formal determination after review of the proposal.

11.1 FAA must work with BUR to ensure that the existing voluntary curfew is vigorously enforced (using John Wayne Airport penalties as a model).	
Adjustment Type	Modification of BUR's Noise Rules
Adjustment Detail	14 C.F.R. Part 161 Notice and Approval of Airport Noise and Access Restrictions Study.
Evaluation	A voluntary curfew is not enforceable. Enforcing a curfew requires compliance with ANCA and 14 CFR part 161. SNA's noise rules were grandfathered under ANCA. NOTE: A vast majority of the airlines and general aviation aircraft can operate anytime without violating BUR's noise rules.
Feasibility Assessment	Not legally permissible.
Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless BGPAA pursues and receives FAA approval to implement nighttime curfew.
Additional FAA Response	A voluntary curfew is not enforceable. Enforcing a curfew requires compliance with ANCA and 14 CFR part 161. We point out that John Wayne Airport's noise rules were grandfathered under ANCA.

11.2 FAA and BUR must enforce compliance with operating procedures during curfew hours.	
Adjustment Type	Modification of BUR's Noise Rules
Adjustment Detail	14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions*.
Evaluation	There is no mandatory curfew at BUR. FAA does not implement or enforce an airport sponsor's local noise rules. A voluntary curfew is not enforceable. Enforcing a curfew requires compliance with ANCA and 14 CFR part 161. A vast majority of the airlines and general aviation aircraft can operate anytime without violating BUR's noise rules.
Preliminary Assessment	Not legally permissible.

Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless BGPAA pursues and receives FAA approval to implement nighttime curfew.
Additional FAA Response	A voluntary curfew is not enforceable. Making a curfew enforceable would require compliance with ANCA and 14 CFR part 161.

12.1 Support changes to FAA regulations or Congressional legislative changes to broaden the applicability of noise attenuation programs and funding to serve the greatest number of residents. This would encompass expanding the current federal criteria for use of such funds. For example, changing the definition of noise impacted areas to include levels less than the 65 DNL.	
Additional FAA Response	FAA has no current plans to change regulations or policies to broaden the applicability of noise attention programs/funding. The FAA will not take a public position on a legislative proposal that would change or limit the applicability of existing provisions.

13.1 Conduct a full EA and robust community outreach prior to any future flight path changes, procedure changes, or flight volume changes.	
Adjustment Type	Environmental Analysis
Adjustment Detail	Create minimum standard
Evaluation	See Recommendation 13
Feasibility Assessment	See Recommendation 13
Feasibility Justification	See Recommendation 13
Next Steps	No further FAA action

13.2 Any changes to routes must include an environmental review and analysis that includes a thorough study of noise and air quality. This review must take into consideration existing environmental justice issues and utilize measures of environmental hazards, such as CalEnviroscreen.	
Adjustment Type	Environmental Assessment
Adjustment Detail	Create minimum standard
Evaluation	See Recommendation 13
Feasibility Assessment	See Recommendation 13
Feasibility Justification	See Recommendation 13

Next Steps	No further FAA action

14.1 Conduct studies compliant with 14 CFR Part 150 in order to establish updated Noise Exposure Maps and Noise Compatibility Programs. The updates may include new or revised noise abatement programs for aircraft operators. The studies should evaluate the applicability of noise abatement departure procedures, preferential runway use and other best practices for aircraft operators.	
Adjustment Type	Noise Study
Adjustment Detail	Update 14 C.F.R Part 150 Airport Noise Compatibility Program (NCP)
Evaluation	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: Preparation of a Part 150 by an airport sponsor is voluntary and is NOT a requirement of the FAA, nor is it a grant agreement obligation requirement (unless the airport has requested and received an AIP grant to fund a Part 150 program). Part 150 NEM's requires only the existing condition and 5-year forecast maps. The NCP is the sponsor's proposed program, subject to regulatory process requirements and FAA approval. It can evaluate numerous noise compatibility alternatives including, but not limited to, preferential runway programs. An NCP is reviews and analyzes Noise Abatement Measures (actions that reduce sound at the source i.e. routing arrival and departure flight paths over less noise sensitive areas), Noise Mitigation Measures – (actions that reduce noise at the receptor, i.e. sound insulation), Land-Use Measures (i.e. zoning or other controls) and Continuing Program Measures (i.e. housekeeping measures for periodic review and maintenance of the NCP itself) on how to reduce the number of people affected by noise of 65 DNL (CNEL in California) or greater and how to prevent the introduction of new non-compatible land uses within the 65 DNL (CNEL) noise contour.
Preliminary Assessment	Conducting a Part 150 is feasible if the airport sponsors choose to do so. It is premature to assess the feasibility of any specific measure(s) that may be included in the resulting Noise Compatibility Program.
Feasibility Justification	14 C.F.R Part 150
Next Steps	BGPAA and LAWA may initiate a Part 150 Update if they choose to do so.
Additional FAA Response	FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a

	requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

14.2 Revamp its sound insulation program by conduction a new Part 150, Airport Noise Compatibility Planning Study, which will result in an updated Noise Exposure Map.	
Evaluation	Non-FAA response required.
Adjustment Type	Noise Study
Adjustment Detail	Update 14 C.F.R Part 150 Airport Noise Compatibility Program (NCP)
Evaluation	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: Preparation of a Part 150 by an airport sponsor is voluntary and is NOT a requirement of the FAA, nor is it a grant agreement obligation requirement (unless the airport has requested and received an AIP grant to fund a Part 150 program). Part 150 NEM's requires only the existing condition and 5-year forecast maps. The NCP is the sponsor's proposed program, subject to regulatory process requirements and FAA approval. It can evaluate numerous noise compatibility alternatives including, but not limited to, preferential runway programs. The NCP reviews and analyzes Noise Abatement Measures (actions that reduce sound at the source i.e. routing arrival and departure flight paths over less noise sensitive areas), Noise Mitigation Measures – (actions that reduce noise at the receptor, i.e. sound insulation), Land-Use Measures (i.e. zoning or other controls) and Continuing Program Measures (i.e. housekeeping measures for periodic review and maintenance of the NCP itself) on how to reduce the number of people affected by noise of 65 DNL (CNEL in California) or greater and how to prevent the introduction of new non-compatible land uses within the 65 DNL (CNEL) noise contour.

Preliminary Assessment	Conducting a Part 150 is feasible if the airport sponsors choose to do so. It is premature to assess the feasibility of any specific measure(s) that may be included in the resulting Noise Compatibility Program.
Feasibility Justification	14 C.F.R Part 150
Next Steps	BGPAA and LAWA may initiate a Part 150 Update if they choose to do so.
Additional FAA Response	FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

14.3 Allow more northerly departures during "calm" wind conditions.	
Evaluation	Non-FAA response required.

14.4 Conduct a technical study to eliminate the substantial overlap of departing flight tracks over the San Fernando Valley. In particular, flights departing VNY south and turning east and flights departing BUR south and turning west, creating a substantially overlapping flight tracks vortex with impacted communities suffering from airport departures from two airports.	
Evaluation	Non-FAA response required.

14.5 In effort to decrease the concentration of flights over any one community, consider the following: the feasibility of eastbound take-offs from BUR, this should include consideration of adjusting flight paths at other airports (Los Angeles International Airport (LAX), BUR, etc.); the feasibility of northbound take-offs from both when there is little to no wind.	
Evaluation	Non-FAA response required.

14.6 In effort to decrease the concentration of flights over any one community, consider the following: the feasibility of eastbound take-offs from BUR, this should include consideration of adjusting flight paths at other airports (Los Angeles International Airport (LAX), BUR, etc.); the feasibility of northbound take-offs from both when there is little to no wind.	
Evaluation	Non-FAA response required.

14.7 Adopt all actions necessary to reduce the number of Runway 15 departures, including runway and directional rotation.	
Evaluation	Non-FAA response required.
Adjustment Type	Noise Study
Adjustment Detail	Update 14 C.F.R Part 150 Airport Noise Compatibility Program (NCP)
Evaluation	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: Preparation of a Part 150 by an airport sponsor is voluntary and is NOT a requirement of the FAA, nor is it a grant agreement obligation requirement (unless the airport has requested and received an AIP grant to fund a Part 150 program). Part 150 NEM's requires only the existing condition and 5-year forecast maps. The NCP is the sponsor's proposed program, subject to regulatory process requirements and FAA approval. It can evaluate numerous noise compatibility alternatives including, but not limited to, preferential runway programs. The NCP reviews and analyzes Noise Abatement Measures (actions that reduce sound at the source i.e. routing arrival and departure flight paths over less noise sensitive areas), Noise Mitigation Measures – (actions that reduce noise at the receptor, i.e. sound insulation), Land-Use Measures (i.e. zoning or other controls) and Continuing Program Measures (i.e. housekeeping measures for periodic review and maintenance of the NCP itself) on how to reduce the number of people affected by noise of 65 DNL (CNEL in California) or greater and how to prevent the introduction of new non-compatible land uses within the 65 DNL (CNEL) noise contour.
Preliminary Assessment	Conducting a Part 150 is feasible if the airport sponsors choose to do so. It is premature to assess the feasibility of any specific measure(s) that may be included in the resulting Noise Compatibility Program.
Feasibility Justification	14 C.F.R Part 150
Next Steps	BGPAA and LAWA may initiate a Part 150 Update if they choose to do so.

Additional FAA Response	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

14.8 Allow eastbound departures using Runway 8 and adopt an enforceable process to ensure a meaningful reduction in Runway 15 departures.	
Additional FAA Response	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

14.9 Any policies, procedures or practices relating to safety considerations for departures regarding proximity to the Verdugo Mountains should equitably be applied regarding proximity to the Santa Monica Mountains.

Additional FAA Response	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

14.10 Discontinue arrivals using Runway 33 except when required due to significant wind conditions.	
Evaluation	Non-FAA response required.
Adjustment Type	Implement Access Restrictions
Adjustment Detail	14 C.F.R Part 161 Notice and Approval of Airport Noise and Access Restrictions Study.
Evaluation	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: Proposed local restrictions must comply with 14 C.F.R. Part 161, *Notice and Approval of Airport Noise and Access Restrictions.* ANCA limits the ability of airport sponsors to implement new restrictions or fines on aircraft operating into or out of their airport after 1990.
Preliminary Assessment	Premature to evaluate. However, LA Council District 2 and 6 are providing contradictory requests concerning southerly and northerly departures.
Feasibility Justification	14 C.F.R. § 161.305 - Required analysis and conditions for approval of proposed restrictions. (Please note that section 161.305 applies to Stage 3 aircraft. Although theoretically there are no stage 2 airplanes flying, the Reauthorization Act of 2018 authorized some limited operation of Stage 2 aircraft.)
Next Steps	No further FAA action unless sponsor pursues and receives FAA approval to implement access restrictions.
Additional FAA Response	Any airport that wishes to pursue an access restriction must follow 14 C.F.R. Part 161, Notice and Approval of Airport Noise and Access Restrictions. Should this occur, FAA will consider the

	request and provide a formal determination after review of the proposal.
Adjustment Type	Implement Access Restrictions

14.11 In the near-term, increase departures heading directly north by designating Runway 33 the preferred operating scheme on days of clam wind (less than 5 knots) and when prevailing winds are from the West, Northwest, North, and Northeast.	
Evaluation	Non-FAA response required.
Additional FAA Response	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

14.12 In the long-term, increase departures heading directly north by designating Runway 33 the preferred operating scheme on days when the prevailing winds are from the West, Northwest, North and Northeast and on days when winds are less than 5 knots from the south. This northern departure route would follow the I-5 Freeway. Cross Runway 8 should be used for all arrivals on those days.	
Evaluation	Non-FAA response required.
Additional FAA Response	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may

	consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

14.13 Conduct a technical analysis to establish fair share arrival and departure flight paths with the goal of flights departing North, South, East, and West roughly 25% in each direction and arriving North, South, East, and West roughly 24% in each direction. If the FAA determines this is not technically feasible, the FAA is requested to design arrival/departure procedures that as closely create fair share arrivals and departures as possible.	
Evaluation	Non-FAA response required.
14.14 Conduct a technical analysis to establish fair share arrival and departure flight paths with the goal of flights departing South and turning West, South and turning East, North and turning West, and North and turning East roughly 25% in each direction and arriving North and South roughly split 50% annually. If the FAA determines this is not technically feasible, the FAA is requested to design arrival/departure procedures that as closely create fair share arrivals and departures as possible.	
Evaluation	Non-FAA response required.

14.15 In the near-term, increase departures heading directly north by designating Runways 34L and 34R the preferred operating scheme on days when the prevailing winds are from the North, Northwest, West, and Northeast and on days when the winds are stagnant or less than 5 knots from the south. All arrivals should be from the west using Runway 16 on those days.	
Additional FAA Response	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements

	prescribed by ANCA and is consistent with the applicable federal obligations.

14.16 In the long-term, increase departures heading directly north by designating Runway 34 the preferred operating scheme on days when the prevailing winds are from the North, Northwest, West, and Northeast and on days when the winds are stagnant or less than 5 knots from the south. All arrivals should be from the west using Runway 16 on those days.	
Additional FAA Response	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations.

14.17 Evaluate and provide new noise mitigation measures for apartments, homes, and businesses based on average decibel level, including consideration of topographical features such as noise reverberations from canyon walls, and not merely proximity to the airports.	
Adjustment Type	
Adjustment Detail	
Evaluation	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: AEE would need to review and concur with the noise modeling inputs associated with topographical features such as noise reverberations from canyon walls.

Preliminary Assessment	Premature to evaluate. Additionally, FAA approval with noise modeling criteria will be necessary.
Feasibility Justification	Would require local and federal changes across all levels of government. Additionally, FAA approval with noise modeling criteria will be necessary.
Next Steps	
Additional FAA Response	The FAA would review AEDT input required with topographical features if the sponsor chooses to revise their NEMs. The NEMs could be updated to incorporate these features to determine new noise mitigation measures. The mitigation would have to be associated with a Part 150 Study initiated by the airport sponsor.

14.18 Commit to all mitigation measures to relieve the impacted communities, including but not limited to soundproofing.	
Adjustment Type	Noise Study
Adjustment Detail	Update 14 C.F.R Part 150 Airport Noise Compatibility Program
Evaluation	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: Preparation of a Part 150 by an airport sponsor is voluntary and is NOT a requirement of the FAA, nor is it a grant agreement obligation requirement (unless the airport has requested and received an AIP grant to fund a Part 150 program). Part 150 NEM's requires only the existing condition and 5-year forecast maps. The NCP is the sponsor's proposed program, subject to regulatory process requirements and FAA approval. It can evaluate numerous noise compatibility alternatives including, but not limited to, preferential runway programs. An NCP is reviews and analyzes Noise Abatement Measures (actions that reduce sound at the source i.e. routing arrival and departure flight paths over less noise sensitive areas), Noise Mitigation Measures – (actions that reduce noise at the receptor, i.e. sound insulation), Land-Use Measures (i.e. zoning or other controls) and Continuing Program Measures (i.e. housekeeping measures for periodic review and maintenance of the NCP itself) on how to reduce the number of people affected by noise of 65 DNL (CNEL in California) or greater and how to prevent the introduction of new non-compatible land uses within the 65 DNL (CNEL) noise contour. Under FAA policy, a municipality (City or County) may use a lower local noise standard (i.e. CNEL 60 dB) for mitigation if the standard is formally adopted by the respective municipality (City or County)

	for all local land use compatibility, not just for airport noise mitigation purposes.
Preliminary Assessment	The FAA cannot make advance commitments, but is prepared to consider funding requests for eligible noise mitigation measures within the defined 65 dB CNEL contour.
Feasibility Justification	14 C.F.R. Part 150. Both BUR and VNY already monitor noise and disclose those monitoring efforts quarterly as part of their State Noise Variance Requirements.
Next Steps	Initiating a 14 C.F.R. Part 150 Update is at the discretion of BGPAA and LAWA. Measures identified and approved by FAA in the NCP will be eligible for federal funding.
Additional FAA Response	FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations. FAA will defer to the BGPAA and LAWA on this decision.

14.19 Conduct a formal noise study of actual (not modeled) noise patterns and impacts surrounding both, and commit to regular renewals, and should install and maintain noise monitoring equipment in the City of Los Angeles.	
Adjustment Type	Noise Study
Adjustment Detail	Noise monitoring and reporting.
Evaluation	14 C.F.R Part 150 requires modeling since you cannot measure future noise contours.
Preliminary Assessment	While the Task Force directed this recommendation to BGPAA and LAWA, the FAA offers the following background information for context: Conducting a Part 150 is feasible if the airport sponsors choose to do so. It is premature to assess the feasibility of any specific

	measure(s) that may be included in the resulting Noise Compatibility Program. Both BUR and VNY already monitor noise and as part of their State Noise Variance Requirements. BUR's existing 4th Quarter 2019 Noise Contour that is based on measured noise surrounding the airport and submitted to Los Angeles County and California as part of its State noise variance requirements identifies a 65 dB incompatible impact area of 13.73 acres, 137 residences and 370 residents. Whereas, VNY's existing 3rd Quarter 2019 Noise Contour is based on measured noise surrounding the airport and submitted to Los Angeles County and California as part of its State noise variance requirements identifies a 65 dB estimated incompatible impact area of 0 (zero) -acres, 0 (zero) -dwelling units and 0 (zero) -residents.
Feasibility Justification	14 C.F.R. Part 150. Both BUR and VNY already monitor noise and disclose those monitoring efforts quarterly as part of their State Noise Variance Requirements.
Next Steps	BGPAA and LAWA may initiate a Part 150 Update if they choose to do so. No further FAA action.
Additional FAA Response	FAA points out that the preparation of a Part 150 Study (or update) by an airport sponsor is voluntary and is NOT a requirement of the FAA. Part 150 provides a structured process for a collaborative approach to reducing incompatible land uses, and includes the airport(s), airlines and other user groups, community representatives, and the FAA. Part 150 requires development of current and forecast Noise Exposure Maps, and development of a Noise Compatibility Program (NCP). The Part 150 process may consider a broad range of measures, including (but not limited to) preferential use runways. The FAA's review of the measures included in the NCP include an evaluation of whether the measures can be safe to operate and meet all requirements prescribed by ANCA and is consistent with the applicable federal obligations. FAA will defer to the BGPAA and LAWA on this decision.

15.1 A Citizens' Advisory Board should be created, including representatives from the impacted communities of Los Angeles.	
Evaluation	Non-FAA response required.

15.2 Monitor potential changes to regulations pertaining to noise, particularly those which may result from the Airport Cooperative Research Program's (ACRP) study Research

Methods for Understanding Aircraft Noise Annoyances and Sleep Disturbance conducted by the National Academies of Sciences, Engineering, and Medicine in 2014.	
Evaluation	Non-FAA response required.

16.1 FAA must provide the Task Force with its post implementation study and all supporting documents, the Noise Screen that was provided to Benedict Hills in about January 2018, all documents requested previously by Task Force members, and all documents requested by the City of Los Angeles under the Freedom of Information Act.	
Adjustment Type	Providing Information
Adjustment Detail	FOIA request
Evaluation	See response to Recommendation 16
Feasibility Assessment	Not applicable
Feasibility Justification	Unable to comment on pending litigation
Next Steps	Await response to ongoing FOIA requests

APPENDIX C

Abbreviations

AEE – Office of Environment and Energy

AFS – FAA Flight Standards Service

ARTCC – Air Route Traffic Control Center

ATC – Air Traffic Control

CEQ – Council on Environmental Quality

DME – Distance Measuring Equipment

DOT – Department of Transportation

DVA – Diverse Vector Area

EA – Environmental Assessment

FMS – Flight Management System

FOIA – Freedom of Information Act

GA – General Aviation

IFP – Instrument Flight Procedures

IFR – Instrument Flight Rules

LAWA – Los Angeles World Airports

LT – Long Term (more than two years)

LOA – Letter of Agreement

MSL – Mean Sea Level

MVA – Minimum Vectoring Altitude

NEPA – National Environmental Policy Act

NM – Nautical Mile

NOTAM – Notice to Airmen

OSA – Operational Safety Assessment

PIC – Pilot in Command

PBN – Performance Based Navigation

RNAV – Area Navigation

SCT – Southern California TRACON

SID – Standard Instrument Departure

SOP – Standard Operating Procedure

SSR – System Service Review

ST – Short Term (two years or less)

TCAS – Traffic Alert and Collision Avoidance System

TMI – Traffic Management Initiative

TMR – Traffic Management Review

TRACON – Terminal Radar Approach Control

U.S.C. – United States Code

VFR – Visual Flight Rules