

## Los Angeles International Airport Advisory Committee

Committee: Residents of El Segundo, Inglewood, Lennox, Hawthorne, Culver City and Westchester/Playa del Rey

June 13, 2008

By Fax to (818) 848-1173

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

Dear Airport Authority:

The Los Angeles International Airport Area Advisory Committee (LAXAAC) is providing in this letter comments relating to the on-going Part 161 study, which is evaluating a proposed mandatory curfew for the Bob Hope Airport of all aircraft operations between 10 p.m. and 6:59 a.m.

As residents of communities near an airport, our Committee members sympathize with the desire to eliminate night-time operations. However, we think it is important for your study to recognize that your curfew may well just shift operations and thus noise to other airports, and in the case of commercial aircraft, to the Los Angeles International Airport (LAX). Contrary to the statement on page 8 of your Executive Summary, the proposed full curfew would **not** "essentially eliminate the nighttime noise problem." Instead, it will shift the problem elsewhere. You should not attempt to deal with the problem of noise in your community merely by shifting that noise to another location which is similarly affected, albeit to a much greater extent.

Three of the items your study is required to address are directly at issue here. First, you are required to address whether the proposed change "is reasonable and is neither arbitrary nor discriminatory." As your Executive Summary explicitly recognizes, some of the commercial operations Bob Hope would turn away would go to LAX (see pages 16, 17). Given that fact, it is not reasonable and would be discriminatory for you to require that traffic to shift to LAX. It would be the definition of "discrimination" to remove a burden from one neighborhood and simply shift it to another that already is recognized as heavily burdened.

The second item your study is required to address is whether the proposed change would "create an undue burden on interstate or foreign commerce." We see impacts of your proposed mandatory curfew in two respects. First, an undue burden on interstate commerce is created when there is only one major airport in all of Los Angeles, Ventura and Orange Counties. Interstate commerce is threatened because this one major airport presents a substantial security risk to the entire metropolitan area. LAX is a well-established terrorist target. Spreading the commercial air transportation to other airports in the region helps to diminish the risk to LAX, and thereby to strengthen the entire region, and indeed, the nation.

Second, there is a burden caused to interstate commerce by forcing people and cargo to fly to LAX when Bob Hope is the preferred destination. While the cessation of the three commercial flights that do not now respect your optional curfew may not seem substantial, the mere imposition of the optional curfew already may be causing some airliners to select LAX, rather than to land at Burbank where they could be closer to the ultimate destination of the passengers and cargo on those flights. All of those passengers are required to get into cars, and the cargo is loaded into trucks, and both then must drive farther than they would like, further increasing the burden on interstate highways, as well as increasing the amount of automotive fuel consumed. Accordingly, this proposal would burden interstate commerce.

We firmly believe that only a regional approach to air transportation will mitigate the transportation and security problems currently impacting the entire Southern California area. Only if the air traffic burden can be spread throughout the Southern California region, will we continue to see the economic benefits of a vibrant transportation system without unduly impacting one portion of the Southern California community.

We hope that the residents of Burbank, Glendale and Pasadena will recognize that they really have a good situation with Bob Hope Airport, and that they would not try to worsen the environment for their fellow citizens near LAX.

We hope that our concerns will be addressed. Please let us know if you have any questions regarding our comments.

Very truly yours,

Danna Cope  
LAXAAC Chair  
Los Angeles International Airport Area Advisory Committee  
#1 World Way P.O. Box 92216  
Los Angeles, CA 90009-2216

Enclosure (information sheet regarding LAXAAC)

cc: LA Mayor Antonio Villagaroisa  
LAX Board of Airport Commissioners  
G. Pacheco, LAX Community Affairs

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### **Los Angeles International Airport Area Advisory Committee (LAXAAC)**

#### **Background Statement**

The Los Angeles International Airport Area Advisory Committee (LAXAAC) has been in existence for more than 30 years as an advisory board to the Board of Airport Commissioners (BOAC).

Members of the committee are appointed by the appropriate legal authority in communities immediately surrounding LAX:

El Segundo,

Lennox,

Hawthorne,

Inglewood,

Culver City,

Marina del Rey,

and the Westchester and Playa del Rey areas of Los Angeles.

The members of LAXAAC have one overriding concern about LAX: **safety**.

This concern includes safety for those who work or live near LAX in addition to air passengers, crews, and aircraft.

Other concerns for committee members are air and noise pollution and surface traffic in and around their communities.

The members of LAXAAC will continue to participate in LAX issue discussions and proposals and look forward to on-going interaction with the members of the BOAC and LAWA staff.

04/07

