

FINAL MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY

A. INTRODUCTION

This Final Mitigation Negative Declaration and Initial Study (Final MND/IS) consists of changes to the description of the proposed Project, the changes in impacts as a result of the changes in the description of the proposed Project, revisions to the Draft MND/IS, the comments received during the public comment period and the responses to those comments, and a mitigation monitoring and reporting program. Together with the Draft MND/IS, which was published on 23 September 2004, these documents fulfill the obligations of the lead agency, the Burbank-Glendale-Pasadena Airport Authority (Authority) with respect to the California Environmental Quality Act (CEQA).

B. CHANGES TO THE DESCRIPTION OF THE PROPOSED PROJECT

After publication of the Draft MND/IS, the Authority continued to refine its plans for use of the A-1 North Property. These changes in plans for this property were in part due to concerns expressed during the public comment period on the Draft MND/IS. As a result of these concerns, the Authority has decided not to include the development of a rental car center on the currently graded but unpaved six-acre portion of the A-1 North Property. Thus, the existing use of this portion of the A-1 North Property, which includes rental car storage and new car storage, would continue as part of the proposed Development Agreement. In addition, the rental car companies would continue to operate as they currently operate (for a discussion of existing rental car operations, see page B-6 of the Draft MND/IS). As a result, no development of premium self-parking would occur in the Terminal South Lot. In addition, with no rental car center on the A-1 North Property, the proposed Project would not be able to accommodate transit vehicles at the Airport. No other changes to the description of the proposed Project are contemplated by the Authority.

C. CHANGES TO THE IMPACTS DISCUSSED IN THE DRAFT MND/IS AS A RESULT OF CHANGES IN THE DESCRIPTION OF THE PROPOSED PROJECT

This section of the Final MND/IS examines the environmental effects of removing the rental car center component from the proposed Project, which was assessed in the Draft MND/IS. This analysis addresses only those areas where an impact was associated with the development of a rental car center on the A-1 North Property. All of the impacts identified in the Draft MND/IS for the rental car center were either "Less Than Significant" or "Less Than Significant with

Mitigation Incorporation”; there were no “Potentially Significant Impacts” resulting from the rental car center component of the proposed Project.

Air Quality

With respect to air quality, the Draft MND/IS concluded that the “...development of a rental car center also would result in a reduction in VMT [vehicle miles traveled] at the Airport.” The reduction in VMT results from decreasing the distance between the rental car return area and the fuel and servicing area. Currently, after they are returned, the rental cars are shuttled to the southwest quadrant of the Airport for fuel and servicing. Under the rental car center component of the proposed Project, the rental car return and fuel/service area was to be located at the rental car center on the A-1 North Property. Only rental cars requiring maintenance beyond fuel and servicing would be shuttled to the southwest quadrant of the Airport. The Draft MND/IS concluded that on an annual basis the VMT would be reduced by 215,600 compared to existing conditions. This reduction in VMT would result in the reduction of 0.61 pounds per day of NO_x, 0.47 pounds per day of HC, 8.04 pounds per day of CO, and 9.56 pounds per day of particulate matter. With the Authority’s decision not to develop a rental car center on the A-1 North Property, these reductions in air pollutant emissions would not occur.

The Draft MND/IS also indicated that the “...development of the rental car center on the A-1 North Property would result in the use of shuttle buses to provide passengers transport between the terminal building and the rental car center.” It was assumed that these vehicles would be 40-foot diesel buses operating every six minutes between the terminal and rental car center. The Draft MND/IS concluded that the shuttle buses would add approximately 40,900 VMT and would result in an increase of 2.45 pounds per day of NO_x, 0.13 pounds per day of HC, 1.51 pounds per day of CO, and 1.87 pounds per day of particulate matter. Although the increase in air pollutant emissions due to the shuttle buses would have been somewhat offset by a reduction in off-Airport rental car shuttle bus trips, the Draft MND/IS indicated that “it is too speculative to calculate the benefit of this reduction in shuttle bus operations...because it is not possible to identify which off-Airport rental car operators would move into the proposed rental car center on the A-1 North Property.” With the Authority’s decision not to develop a rental car center on the A-1 North Property, the increase in air pollutant emissions resulting from the shuttle bus use would not occur.

Table 1 calculates the change in air pollutant emissions that would occur as a result of the rental car center component not being developed on the A-1 North Property. Table 1 shows that the reductions in HC, CO, and PM₁₀ are not as great without the rental car center component of the proposed Project, but are still below the SCAQMD’s significance criteria. Table 1 also shows that NO_x emissions improves slightly due to the removal of rental car shuttle bus operation, which would not be needed if the rental car center is not built.

TABLE 1: AIR POLLUTANT EMISSIONS CHANGE DUE TO REMOVAL OF RENTAL CAR CENTER FROM THE PROJECT

	Emissions (lbs/day)			
	NOX	HC	CO	PM10
Change in Emissions with the proposed Project (negative number denotes decrease) ¹	1.20	-0.80	-14.80	-17.49
Add Reduction in Emissions due to Reduced Rental Car VMT	0.61	0.47	8.04	9.56
Subtract Increase in Emissions due to Rental Car Center Shuttle Buses	-2.45	-0.13	-1.51	-1.87
Change in Emissions of the Proposed Project without the Rental Car Center	-0.64	-0.46	-9.27	-9.80
Significance Criteria for SCAQMD	55.00	55.00	550.00	150.00
Proposed Project Emissions Increase is Above or Below Significance Criteria?	Below	Below	Below	Below

¹From Table 4 on page 22 of the Draft MND/IS

Cultural Resources

The Draft MND/IS determined that the excavation required for the construction of the underpass and underground fuel tanks associated with the Quick Turn Around (QTA) portion of the rental car center has the potential to result in "...the discovery of previously unknown subsurface historic, prehistoric, or paleontological resources." The Draft MND/IS determined this impact was "Less Than Significant With Mitigation Incorporation". With the Authority's decision not to develop a rental car center on the A-1 North Property, the QTA facility would not be built, which would eliminate the potential for the discovery of cultural resources at the QTA site due to construction of the rental car facility. The underpass would still be constructed and the impact would remain "Less Than Significant With Mitigation Incorporation".

Geology and Soils

The Draft MND/IS concluded that with respect to strong seismic ground shaking, the surface parking lots involved in the proposed Project

are unlikely to expose people to risk of injury or collapse due to the nature of the development itself. Further, the other buildings and structures, such as the rental car center customer building, the valet parking building, and the rental car parking structure (one elevated level), would be designed and constructed in conformance with the all applicable Uniform Building Code standards for Zone IV levels of seismic risk. With implementation of the measures required to meet these standards, significant impacts related to seismic ground shaking are not expected to occur as a result of the proposed project. This would constitute a less-than-significant impact.

With the Authority's decision not to develop a rental car center on the A-1 North Property, the potential substantial adverse effects related strong seismic ground shaking would remain a less-than-significant impact.

The Draft MND/IS determined that there would be a less-than-significant impact due to the risk of ground failure including liquefaction. The removal of the rental car center from the proposed Project would not change this determination.

The Draft MND/IS determined that the excavation activity associated with the underground fuel tanks at the rental car center QTA facility and the underpass beneath the realigned Terminal Loop Roadway could result in soil erosion. The Draft MND/IS recommended mitigation measures to reduce the impacts to “Less Than Significant With Mitigation Incorporation”. With the Authority’s decision not to develop a rental car center on the A-1 North Property, this would eliminate the need to excavate for the underground fuel tanks at the QTA. This, in turn, would reduce, but not eliminate, the need for mitigation due to the excavation required for the underpass.

Hazards and Hazardous Materials

Removal of the rental car center from the proposed Project would eliminate the underground fuel tank or tanks associated with the QTA facility. The Draft MND/IS determined that the fuel tanks were considered a less-than-significant impact, in part, because of the expected reduction in the overall number of fuel tanks that would result from a consolidated rental car facility.

The fueling and auto-washing stations associated with the QTA involve hazardous materials. The Draft MND/IS determined that “...the proposed Project would have a less-than-significant impact in terms of upset and accident conditions involving the release of hazardous materials.” Although removal of the rental car center from the proposed Project would remove the handling of hazardous materials at the QTA facility, auto-washing and fueling would continue to occur at the existing on-Airport rental car facilities.

The Draft MND/IS indicated that portions of the proposed Project, including the rental car center, are on the list of hazardous material sites compiled pursuant to Government Code Section 65962.5. Although the site has been remediated to a depth of 10 feet, the excavation for the underground fuel tanks at the QTA and underpass would be greater than 10 feet. Mitigation Measure 4(b) addresses circumstances in which contractors encounter soils indicative of contamination, which resulted in a determination “Less Than Significant With Mitigation Incorporation”. With the Authority’s decision not to develop a rental car center on the A-1 North Property, this would remove the potential for encountering contaminated soil associated with the excavation for the QTA underground tank, but would not affect the potential for encountering contaminated soil associated with the excavation for the underpass. Therefore, this remains a less-than-significant impact with mitigation incorporation.

Transportation/Traffic

The Draft MND/IS found that the intersections in the vicinity of the Airport currently operate at a Level of Service (LOS) C or better during the a.m. and p.m. peak traffic hours. The Draft MND/IS indicated that the rental car center would result in a reduction of off-Airport rental-car generated traffic by providing rental car parking, fueling, and servicing facilities on the A-1 North Property. The Draft MND/IS also concluded that the rental car center would reduce shuttle bus trips by off-Airport rental car companies that relocate to the rental car center. The Draft MND/IS concludes, “In totality, the number of trips through the Hollywood Way / Thornton Avenue and the Empire Avenue / Terminal Loop Roadway intersections would be reduced.” With the

Authority's decision not to develop a rental car center on the A-1 North Property, the reduction in traffic volumes on the Airport area roadways that was attributable to the reduction in vehicle trips associated with the operation of the on-Airport rental car companies would not occur. Therefore, intersections in the vicinity of the Airport would remain at LOS C or better during the a.m. and p.m. peak traffic hours.

Conclusions

None of the conditions identified in CEQA Guidelines Section 15073.5 that would require a recirculation of the negative declaration apply to this change in the proposed Project. No changes are proposed that would require a substantial revision of the Draft MND/IS. No new avoidable significant impact is identified and no new mitigation measures or project revisions are necessary to reduce potential effects to a less-than-significant level. Additionally, no substantial changes have occurred with respect to the circumstances under which the project is being undertaken that would involve new significant environmental impacts not covered in the Draft MND/IS. No new information has become available indicating that significant effects would occur that are not discussed in the Draft MND/IS; that impacts discussed in the Draft MND/IS would be substantially more severe; that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more impacts of the proposed Project; nor that mitigation measures not previously considered in the Draft MND/IS would substantially lessen one or more of the significant environmental effects.

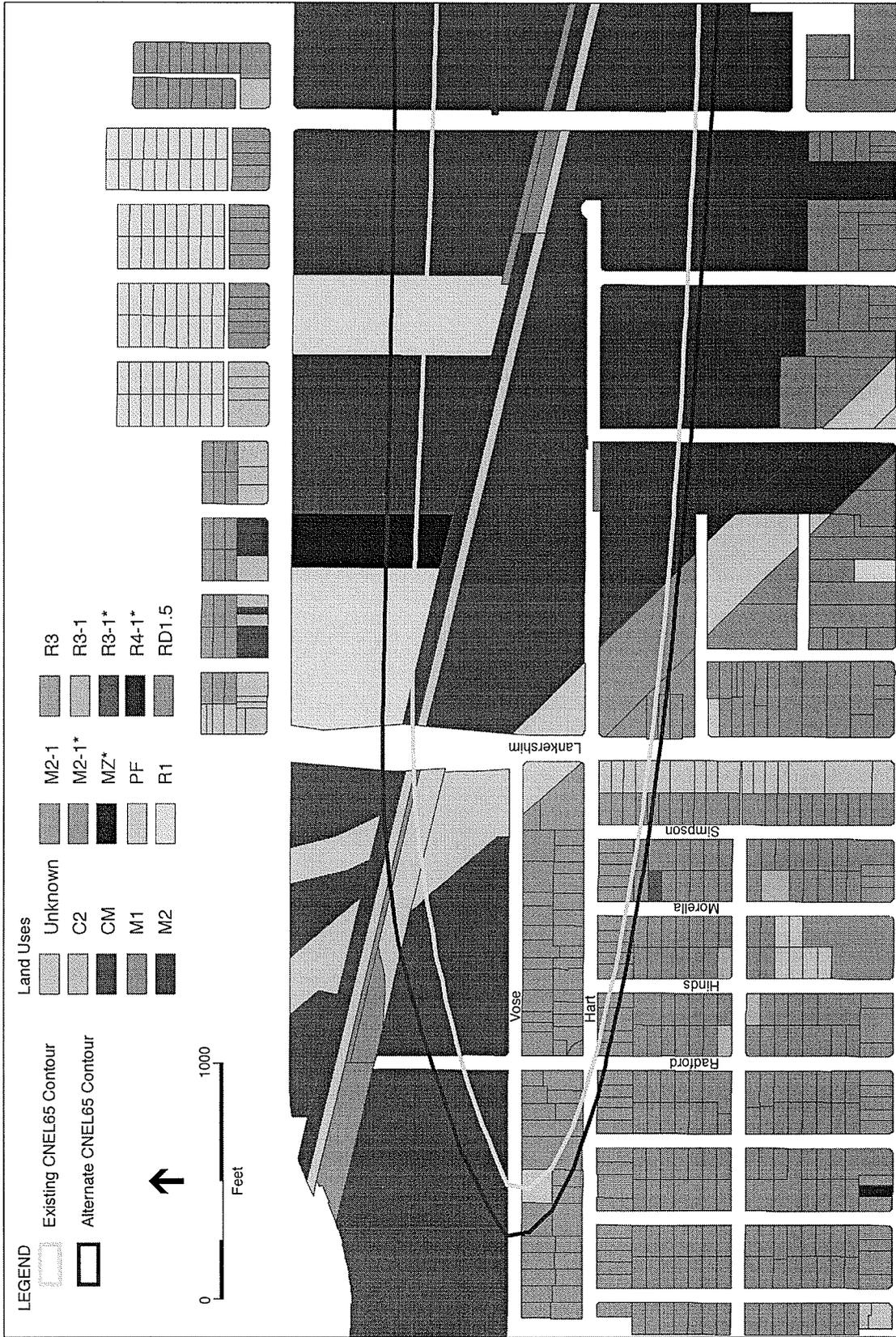
D. REVISIONS TO THE DRAFT MND/IS

The following corrections and changes are made to the Draft MND/IS and are incorporated as part of the Final MND/IS. Revised or new language is double-underlined. Where a change is made as part of a response to a comment on the Draft MND/IS, the comment number is noted in brackets.

Page 17, sixth bullet is revised to read:

new buildings within the Building Restriction Line (BRL), except for buildings located on the landside (southerly and ~~westerly~~ easterly) of the existing passenger terminal and the relocation of Parking Lot A discussed above.

Page 47, Figure 7 has been revised to include the names of the streets on the map. This revised figure is printed on the next page.



Development Agreement and Related Actions / 204014 ■ **Figure 7**
 Detail of Land Uses West of BUR within the 65 CNEL
 Noise Contour under Existing Conditions and
 upon Completion of Taxiway D

SOURCE: PSOMAS and Environmental Science Associates, 2004

Page 57, paragraph 3, sentence 3 is revised to read:

The reduction of approximately 1,200 vehicle trips through the Hollywood Way intersections with Thornton Avenue and Winona Avenue as a result of the elimination of valet parking on the B-6 Trust Property and the reduction of vehicle trips associated with shuttling rental cars through the Empire Avenue / Terminal Loop Roadway intersection would more than offset the minimal increase in trips by long-term public parking patrons at intersections in the Airport vicinity.

E. COMMENTS AND RESPONSES TO COMMENTS

Introduction

This section contains information in response to comments received during the public comment period (24 September 2004 through 18 October 2004). Following this introduction, a list of commenters grouped by agency, organization, and individual is provided. Within the groupings, comment letters are organized in chronological order.

This section also contains copies of written comments received during the comment period and responses to those comments. Each comment is numbered in the margin of the comment letter, and the responses to all of the comments in a particular letter follow that letter. Where a response includes a change to the text of the Draft MND/IS, a reference is made to the section D, Revisions to the Draft MND/IS, where text changes are listed in order of page number in the Draft MND/IS.

List of Commenters

AGENCIES COMMENTING ON THE DRAFT MND/IS

The following agencies submitted written comments on the Draft MND/IS during the public review period (the date of the letter is also presented):

State Agencies

None

Local and Regional Agencies

Southern California Regional Rail Authority	October 14, 2004
City of Burbank	October 15, 2004
South Coast Air Quality Management District	October 15, 2004

ORGANIZATIONS COMMENTING ON THE DRAFT MND/IS

The following organizations submitted written comments on the Draft MND/IS during the public review period (the date of the letter is also presented):

Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment	October 18, 2004
--	------------------

INDIVIDUALS COMMENTING ON THE DRAFT MND/IS

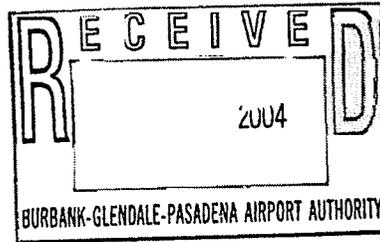
The following individuals submitted written comments on the Draft MND/IS during the public review period (the date of the letter is also presented):

Eden Rosen	October 14, 2004
Philip and Carolyn Berlin	October 16, 2004
Dr. David W. Gordon	October 17, 2004
Ron Vanderford	October 17, 2004
R. C. "Chappy" Czapiewski	October 18, 2004
Kevin Muldoon	October 18, 2004
Howard Rothenbach	October 18, 2004
Mark Stebbeds	October 18, 2004

Comments and Responses to Comments on the Draft MND/IS

October 14, 2004

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, CA 91505



Member Agencies:
Los Angeles County
Metropolitan Transportation
Authority.
Orange County
Transportation Authority.
Riverside County
Transportation Commission.
San Bernardino
Associated Governments.
Ventura County
Transportation Commission.
Ex Officio Members:
Southern California
Association of Governments.
San Diego Association
of Governments.
State of California.

Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for the Burbank-Glendale-Pasadena Airport Authority Development Agreement and Related Actions

Dear Mr. Feger:

The Southern California Regional Rail Authority (SCRRA) operator of Metrolink commuter rail services the Bob Hope (formerly Burbank) Airport Rail Station, south of the air passenger terminal. Amtrak intercity trains also serve this station. SCRRA learned of this Notice of Intent from another interested agency, rather than from the Airport Authority. In the future, please notify me directly of any proposals that potentially impact the rail station area. As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink on member agency-owned and on private freight railroad rights of way. Additionally, SCRRA provides a range of rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA member agencies are the Orange County Transportation Authority (OCTA), Los Angeles County Metropolitan Transportation Authority (MTA), San Bernardino Associated Governments (SANBAG), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

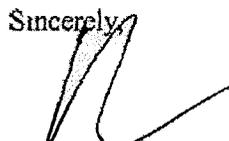
This document addresses development at the airport for the next seven years. Based on the proximity of the rail line and station to the proposed development, the following recommendations are being conveyed by SCRRA:

1. Consideration should be given for pedestrian access to and from the rail station and the passenger terminal during design and construction. Such planning will facilitate use of the rail station and safe pedestrian conditions.
2. If the existing parking at the rail station is to be changed in any way as the airport parking is reconfigured, the rail station parking should only be improved.

Burbank Airport Comments
October 14, 2004
Page 2

If you have any questions regarding these comments please contact Deadra Knox, Strategic Development Planner, at (213) 452-0359 or by e-mail at knoxd@scrra.net.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Solow', written over the word 'Sincerely,'.

David Solow
Chief Executive Officer

cc: Patricia Chen, MTA
Susan Chapman, MTA
Pat Merrill, Caltrans
Freddy Cheung, UPRR
SCRRRA Central Files

SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY

1. The sidewalk providing access between the terminal building at the Airport and the Bob Hope Airport Rail Station would not be affected during construction of the various components of the proposed Project. The existing safe pedestrian conditions would not be affected by the proposed Project.
2. As shown in the project description section of the Draft MND/IS, the various components of the proposed Project would not result in any changes to the existing parking at the Bob Hope Airport Rail Station. The Bob Hope Airport Rail Station is neither owned nor operated by the Burbank-Glendale-Pasadena Airport Authority. Parking that is located south of Empire Avenue along the railroad right-of-way would not be affected by the proposed Project. Parking currently provided north of Empire Avenue by Star Park is offered to all members of the public for a fee. The proposed Project would continue to make available, for a fee, parking for the general public, including those individuals who use rail services.

October 15, 2004

VIA FACSIMILE TO (818) 848-1173 (2 PAGES TOTAL) AND U.S. MAIL

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, California 91505

Re: Bob Hope Airport/Notice of Intent to Adopt a Mitigated Negative Declaration for Development Agreement and Related Actions

Dear Mr. Feger:

The City of Burbank ("City") has reviewed the above-referenced Mitigated Negative Declaration ("MND") and respectfully submits the following comments and questions:

1. In the project description, what does no "development" of a terminal mean? Does this refer only to actual construction of a terminal or does it include the study, planning, and application processes? The project description should contain additional details in this regard. | 1
2. The MND indicates that on- and off-Airport rental car companies may relocate to a consolidated rental car center site on the A-1 property. The MND does not explain the potential traffic, air quality, and other impacts associated with such a consolidated rental car center. Please provide more information regarding such impacts or potential benefits specifically from this project component. | 2
3. Please provide details regarding which rental car agencies are possible relocation candidates, where their current facilities are located, and how many cars they would be moving from their current locations. What use will be made of the land these rental car companies currently occupy if they relocate to the proposed consolidated rental car site? It may be necessary to study the impacts of the subsequent projects that will indirectly result from this project. | 3
4. The City encourages the use of compressed natural gas or other alternative energy shuttle busses to service the entire Airport as this would reduce air quality impacts. Please include a discussion of the potential benefits of such technology and utilize non-diesel shuttle busses for the project if feasible to do so. | 4
5. The City encourages efforts to reduce the air quality impacts from construction equipment. Specifically, all diesel equipment should be fitted with ARB Level 2 emission control devices. All diesel equipment should also be required to use ultra low sulfur diesel with a sulfur content not to exceed 15 PPM. | 5

- 6. Why were the air quality impacts for the shuttle bus and vehicle operations considered separately from the aircraft operations? The MND should address the combined air quality impacts from all aspects of the project considered together. | 6
- 7. Why were the air quality impacts from the aircraft operations studied using today's operational levels, as opposed to operation levels expected through the term of the proposed development agreement? The document should analyze impacts over the term of the development agreement. | 7
- 8. A Metrolink commuter rail station is located next to the Airport in proximity to the A-1 property. The traffic analysis should analyze how this resource can be used in connection with the project as an opportunity to reduce vehicle trips to the Airport. | 8
- 9. The MND, at pages 3 and 4, describes the physical construction contemplated by the Authority under the currently proposed project. Please provide assurances that the Authority has no additional development plans or proposals at this time or in the reasonably foreseeable future which should be analyzed for environmental effects in connection with this project. | 9
- 10. What is the expected increase in passenger volume over the term of the development agreement and resulting MAP at the end of the term? | 10
- 11. On page 55 of the MND, there is a discussion about the Airport continuing to utilize the B-6 property for overflow rental car parking. This does not reflect the City's current understanding of the terms of the draft development agreement. Please clarify this issue and discuss any changes to the impact analysis that may result from this change in the project description. | 11

Please note that the City's comments are intended to address the project as proposed in the MND. If the project applications eventually submitted to the City for review and approval as a responsible agency differ from that which is proposed in the MND, or if only part of the proposed project is actually pursued, the City reserves the right to make additional comments and require additional environmental review of the revised project.

Thank you for the opportunity to comment upon the MND. If you have any questions or wish to discuss these comments further, please do not hesitate to contact me.

Sincerely,
Community Development Department

Susan M. Georgino
Community Development Director

C: Burbank City Council Members
Burbank Planning Board Members
Mary Alvord, City Manager
Dennis Barlow, City Attorney

CITY OF BURBANK

1. The proposed Draft Development Agreement provides that the Authority agrees not to (1) construct a new or relocated passenger terminal building; (2) commence public review or publicly announce the intention to prepare any environmental document related to a plan or plans for a new or relocated passenger terminal building; (3) submit applications for funding or permits for a new or relocated passenger terminal building to any local, state or federal agency; or (4) take any action that, pursuant to law, establishes a deadline for the City to take any public action or position on a plan or plans for a new or relocated passenger terminal building during the applicable term of the agreement. Therefore, although the restriction would allow certain planning actions to be taken, the practical effect is that no planning for a new passenger terminal building could be undertaken for a ten year period.
2. As stated in Section B of this document, the Authority has decided not to include the development of a rental car center on the A-1 North Property. The changes in impacts associated with this decision are described in Section C of this document. The comment regarding the impacts of a consolidated rental car center is no longer relevant given the Authority's decision not to develop a rental car center on the A-1 North Property. Therefore, no further analysis is required.
3. As stated in Section B of this document, the Authority has decided not to include the development of a rental car center on the A-1 North Property. The changes in impacts associated with this decision are described in Section C of this document. The comment regarding the use of land vacated by off-Airport rental car companies that would relocate to a consolidated rental car center on the A-1 North Property and the attendant impacts that could occur from the re-use of those properties is no longer relevant given the Authority's decision not to develop a rental car center on the A-1 North Property. Therefore, no further analysis is required.
4. As stated in Section B of this document, the Authority has decided not to include the development of a rental car center on the A-1 North Property. The changes in impacts associated with this decision are described in Section C of this document. The comment regarding the impacts associated with the use diesel shuttle buses to provide access between the passenger terminal and the rental car center on the A-1 North Property is no longer relevant given the Authority's decision not to develop a rental car center on the A-1 North Property. With no rental car center included as part of the proposed Project, the use of shuttle buses at the Airport would be the same as that which currently occurs. Thus, no change in air pollutant emissions from the use of shuttle buses at the Airport would occur and no further analysis or additional mitigation is required.
5. The Authority acknowledges the commenter's suggestions regarding the inclusion of additional measures to reduce construction-related air quality impacts. However, as shown in the response to comment #1 of the South Coast Air Quality Management District (SCAQMD) letter, the construction-related air quality emissions do not exceed the

significance threshold established by the SCAQMD. Therefore, the Authority is not required to implement any mitigation measures. However, the Authority would implement Mitigation Measure #1 on page 62 of the Draft MND/IS to reduce air pollution emissions that would occur on a temporary basis during construction activities.

6. As stated in paragraph 3 on page 23 of the Draft MND/IS, the completion of Taxiway D would result in a more efficient use of the airfield, which would reduce the taxi idle time for aircraft operated at the Airport. Because this would result in a corresponding reduction in air pollutant emissions from aircraft, it was determined that combining vehicular and aircraft emissions was not necessary. Thus, the approach taken by the Authority was to present the most conservative estimate of air pollutant emissions that could occur as a result of the proposed Project.
7. Although the Development Agreement would last for 7 years, the completion of Taxiway D is expected to occur in the first year of the Development Agreement. Therefore, the Draft MND/IS uses existing aircraft operations for purposes of determining the reduction in air pollutant emissions as a result of the completion of Taxiway D.
8. It is acknowledged that some passengers and employees use Metrolink for access to and from the Airport, and to the extent that the use of Metrolink services for air passenger access to the Airport increases, incremental decreases in vehicular traffic levels would likely result. However, the proposed Project would not have any impact on the existing Bob Hope Airport Rail Station or the operations of Metrolink because all physical components of the proposed Project are north of Empire Avenue and because none of the components of the proposed Project would result in a change in the number of passengers that use Metrolink to access the Airport. In addition, as stated in paragraph 3 on page 57 of the Draft MND/IS, there would be a reduction in vehicle trips as a result of the proposed Project. Thus, no significant traffic impact would occur as a result of the proposed Project and no mitigation measures are required. However, the Authority would continue to work with the Southern California Regional Rail Authority to accommodate passengers and employees that use Metrolink.
9. Other than the specific activities described in the project description, the Authority does not have additional or alternate development plans that are reasonably foreseeable. Attempts at forecasting such potential future projects would be an exercise of pure speculation and would not provide meaningful information or analysis. Further, the terms of the Development Agreement restrict the Authority's ability to develop and even to plan for a number of future project types, which further demonstrates that those types of projects are not foreseeable at this time. Please also see the response to comment #7 of the Philip and Carolyn Berlin letter.
10. The growth in passengers using the Airport over the term of the Development Agreement would not be affected by any of the components of the proposed Project. It is not possible to predict with any certainty the number of passengers over the term of the Development Agreement. The only existing forecast that has been prepared for the Airport is the Federal

Aviation Regulation (FAR) Part 161 forecast, which predicted a 2.8% annual growth rate. If this rate is extended to the end of 2012, this would result in a growth of 25% over eight years from the last full year's worth of passenger data (i.e., 2003). In 2003, the Airport had approximately 4.6 million passengers. Assuming the FAR Part 161 growth rate, it is estimated that there would be 5.8 million passengers in 2012. It is important to note that this forecast was prepared prior to the initiation of the proposed Project and that the implementation of the proposed Project would have no effect on any forecasting effort undertaken for the Authority.

11. In the event that the proposed Project is approved, the Authority intends to discontinue parking uses on the B-6 Property. This would slightly reduce the number of vehicles using Hollywood Way and the intersections of Hollywood Way / Thornton Avenue and Hollywood Way / Winona Avenue.

SCAQMD: Charles Blankson, Ph.D
Tel: 909 396-3304; Fax: 909 396-3324

Fax

To: Mr. Dan Feger, P.E. **From:** Charles Blankson
Fax: 818 848-1173 **Date:** October 15, 2004
Phone: 818 840-8840 **Pages:** Four including this cover sheet
Re: MND for Bob Hope Airport Development **CC:** [Click here and type name]
Agreement and Related Actions

Urgent For Review Please Comment Please Reply Please Recycle

Comments: [Click here and type any comments]





South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

FAXED: OCTOBER 15, 2004

October 15, 2004

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Building # 9, Room 210
Burbank, CA 91505

Dear Mr. Feger:

Mitigated Negative Declaration for Bob Hope Airport Development Agreement And Related Actions

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

A handwritten signature in black ink, appearing to read 'Susan Nakamura', is written over a horizontal line.

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN: CB

LAC040929-01
Control Number

Dan Feger

October 15, 2004

**Mitigated Negative Declaration (MND) for Bob Hope Airport Development
Agreement and Related Actions**

1. Project Construction Emissions: The proposed project involves the acquisition and grading of up to 26.46 acres of land and the development of new structures. The proposed developments include the construction of a 3,200 square-foot valet parking plaza and building, a 10,200 square-foot rental car center customer building, structured rental car parking facilities, construction of an underpass, self-parking facilities, the realignment of the Terminal Loop Roadway and the completion of Taxiway D. The MND analyzes the operational air quality impacts that would result from the proposed developments, relating specifically to the changes in location of valet parking, employee and passenger parking and the rental car center.

The MND, however, provides no data by which to evaluate the air quality impacts of the construction of the proposed facilities. CEQA Guidelines Section 15147 requires lead agencies to provide summarized technical data and other relevant information "sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public". The Checklist does not provide any data or analysis to demonstrate that the proposed construction emissions will not be significant. The lead agency simply states on page 23 of the MND that, "construction activities would result in temporary increases in criteria emissions", but that these activities "would not result in a significant temporary increase in NO_x, HC or CO emissions". Please note that without providing a quantitative analysis of potential emissions from construction using the calculation methodologies in the 1993 SCAQMD CEQA Air Quality Handbook (Handbook) or other approved methodologies, the lead agency has not demonstrated that the project's construction air quality impacts will not be significant. Alternatively, the lead agency may consider using California Air Resources Board (CARB) computer model URBEMIS 2002 to estimate the project's construction emissions. The model can be obtained at the SCAQMD website: www.aqmd.gov/ceqa/modeling/html.

If quantification of emissions reveals that the project's construction emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance. The following measures are recommended for consideration by the lead agency to reduce construction emissions:

- Water active grading sites, unpaved roads or surfaces at least twice daily.
- Enclose, cover or apply soil binders to exposed piles of gravel or sand.
- Trucks hauling dirt, sand, gravel or soil are to be covered in accordance with Section 23114 of the California Vehicle Code.
- Sweep nearby or adjacent streets at the end of the day if visible soil material is carried over from construction site.
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off tires of vehicles and any equipment leaving construction site.
- Suspend all grading and excavating operations when wind speeds exceed 25 mph.
- Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturer's specifications.

1

Dan Feger

-2-

October 15, 2004

- Use alternative clean fuel such as compressed natural gas-powered construction equipment with oxidation catalysts instead of diesel-powered engines, or if diesel equipment has to be used, use particulate filters, oxidation catalysts and low-sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.

1
cont.

2. Diesel Emissions: The lead agency states on page 21 of the MND that with the development of the rental car center on the A-1 North Property, shuttle buses would be used to transport passengers between the terminal building and the rental car center. The lead agency proposes to use 40-foot diesel buses for these shuttles. The lead agency is reminded that CARB has designated diesel particulates as a carcinogen since 1998. The SCAQMD recommends that the lead agency perform an air toxics health risk analysis to estimate the cancer risk from using these diesel-fueled buses. The SCAQMD has prepared interim guidance for preparing such an analysis. This interim guidance can be accessed at the SCAQMD website: www.aqmd.gov/ceqa/handbook/html under Health Risk Assessment Guidance. The SCAQMD recommends the use of non-diesel, cleaner burning shuttle buses to mitigate potential health risks from diesel particulate.

2

In addition, the lead agency should also clarify that with the implementation of the proposed project, the heavy-duty fleet would be in compliance with the SCAQMD Rules 1194 – Commercial Airport Ground Access and 1196 – Clean On-Road Heavy-Duty Public Fleet Vehicles.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

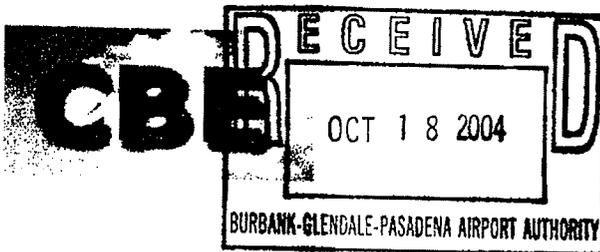
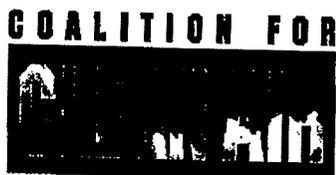
1. The commenter is correct in noting that the construction phase of the proposed Project would result in temporary increases in criteria air pollutant emissions. These temporary increases are associated with equipment used for the realignment of the Terminal Loop Roadway, the placement of fill, the relocation of Lot A, the completion of Taxiway D, and the construction of various buildings on the A-1 North Property. Although these construction activities would occur sequentially (e.g., the completion of Taxiway D can only occur after the relocation of Lot A), air pollutant emissions during construction were estimated assuming that all projects would occur concurrently. Table 2, which provides an estimate of the criteria air pollutant emissions that would occur during the construction phase of the proposed Project, shows that the emissions would not exceed the significance threshold established by the South Coast Air Quality Management District. Therefore, no significant air pollutant emissions would occur. In addition, although not required, the Authority has agreed to implement Mitigation Measure #1 on page 62 of the Draft MND/IS implemented to reduce the temporary air quality impacts that would occur during construction. No additional mitigation measures are required.

TABLE 2: CRITERIA AIR POLLUTANT EMISSIONS DURING THE DEMOLITION AND CONSTRUCTION PHASE OF THE PROJECT

Criteria Air Pollutant	Air Pollutant Emissions During Construction (pounds per day)	SCAQMD Significance Threshold (pounds per day)	Air Pollutant Emissions During Construction (tons per quarter)	SCAQMD Significance Threshold (tons per quarter)
ROG	5.33	75	0.27	2.5
NOx	37.27	100	1.89	2.5
CO	18.10	550	0.99	24.75
PM-10	1.3	150	0.06	6.75

Note: Uses California Air Resources Board (CARB) URBEMIS 2002 model.

2. As stated in Section B of this document, the Authority has decided not to include the development of a rental car center on the A-1 North Property. The changes in impacts associated with this decision are described in Section C of this document. The comment regarding the need to conduct an air toxics health risk analysis due to the use of diesel shuttle is no longer relevant given the Authority's decision not to develop a rental car center on the A-1 North Property. Therefore, no further analysis is required.



October 18, 2004

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, CA 91505

Re: Mitigated Negative Declaration and Initial Study of the Burbank-Glendale Pasadena Airport Authority Development Agreement and Related Actions.

Dear Mr. Feger,

We write on behalf of the Natural Resources Defense Council ("NRDC"), Coalition for Clean Air ("CCA"), Communities for a Better Environment ("CBE"), and our over 550,000 members, tens of thousands of whom reside in Southern California, to strongly urge you not to approve the proposed Burbank-Glendale-Pasadena Airport Authority Development Agreement and Related Actions and not to certify the Mitigated Negative Declaration and Initial Study ("CEQA Document") for the Project. It is imperative that Burbank-Glendale-Pasadena Airport Authority ("Authority") staff remedy critical deficiencies in the Final CEQA Document and propose meaningful mitigation of the Project before the Authority finalizes and approves the Final CEQA Document.

The Project proposal to acquire and fully develop a 26.46 acre property – identified as the A-1 North Property – and complete Taxiway D may have a profound effect on the environment and the neighboring communities that surround the Bob Hope Airport ("Airport"). While we do not oppose the proposed Project per se, the California Environmental Quality Act ("CEQA") requires that the Burbank-Glendale-Pasadena Airport Authority accurately identify the environmental impacts of the Project in the CEQA Document, and propose and commit to adequate, meaningful and feasible mitigation measures. Unfortunately, the Draft CEQA Document not only fails to properly evaluate the proposed Project's environmental impacts from an independent and comprehensive standpoint, it also falls far short on proposing and committing to meaningful, cost-effective, and feasible mitigation measures for such impacts caused by the Project.

The Draft CEQA Document Fails to Meet CEQA Guidelines as it Seeks to

Natural Resources Defense Council
1314 Second Street
Santa Monica, CA 90401
(310) 434-2300

Coalition for Clean Air
523 W. 6th Street, 10th Floor
Los Angeles, CA 90014
(213) 630-1192

Communities for a Better Environment
5610 Pacific Boulevard
Suite 203
Huntington Park, CA 90255
(323) 826-9771

Piecemeal the Project

The Authority staff has yet to provide the community and regional decision makers with adequate guidance as to how the Authority plans to fully develop the Airport's facilities in the future. Traditionally, this guidance is provided to the community in the form of a master plan.¹ By failing to provide the community with a master plan that articulates the future goals and objectives of the Authority for future Airport operations, not only does the current Project appear to piecemeal the CEQA process, it also denies itself the ability to properly evaluate the long-term environmental impacts of the Project to the surrounding community and its immediate environment. For example, if the Authority ultimately plans to build a replacement terminal on the B-6 Trust Property – a property that is to be retained as part of the proposed Development Agreement between the Airport Authority and the City of Burbank – the Authority may actually discover that the Project would not meaningfully achieve the degree of air quality, noise and transportation/traffic benefits that it claims under the Draft CEQA Document. Further, a letter dated October 3, 2001 authored by then City Manager Robert "Bud" Ovrum to Executive Director Dios Marrero clearly states that the B-6 Trust Property is "the most desirable location for a relocated passenger terminal" and expresses the hope that the City and the Authority can use "this standstill period productively to continue discussions aimed at reaching consensus on a plan that would allow the Authority to relocate the terminal onto the B-6 Property before it has to sell the property." Because there is no credible evidence known to the public that contradicts both the City's and Authority's reason for retaining the B-6 Trust Property, and it appears that the Development Agreement being worked out between the two agencies is an attempt to reach "consensus" on the B-6 Property, the Lead and Responsible Agencies can not and should not claim the benefits that the Draft CEQA Document currently claims, nor should the final CEQA document fail to provide reasonable, meaningful and sufficient mitigation measures for all environmental impacts that will occur if the Project is approved.

CEQA mandates that an agency look at a complete "project," so that "environmental considerations do not become submerged by chopping a large project into many little ones – each with a minimal potential impact on the environment – which cumulatively may have disastrous consequences." *Bozung v. Local Agency Formation Commission* (1975) 13 Cal.3d 263, 283-84. By improperly focusing on only one phase of modernizing the Bob Hope Airport – and leaving out future phases of the project – the Airport Authority will not fully account for the cumulative impacts of the entire project. This, in turn, will mean that Airport Authority staff will not adopt adequate measures to mitigate the Project's full impacts. This Project, as proposed, would not only violate CEQA, it would be inconsistent with the Airport Authority's recent attempts to harmonize relations with the City and community of Burbank. It is imperative that the environmental and public health impacts of the entire project—including, but not limited to, the relocation of a future replacement terminal—be assessed and mitigated in one comprehensive environmental impact report ("EIR").

¹ The Los Angeles World Authority ("LAWA") currently provides a Master Plan for Los Angeles International Airport and the Los Angeles City Council has recently called for similar master plans to be prepared or further developed for the remainder of the airports under LAWA's control.

CEQA Document Considers the Incorrect Baseline

The Draft Document clearly associates the Project with a development agreement that would address future development at the Airport for a fixed term of seven years – freezing in place existing City rules and regulations governing the development at the Airport in exchange for the Authority’s agreement not to pursue certain other development and uses for the term of the development agreement. Thus, the Draft CEQA Document should evaluate the environmental impacts associated with the Project by comparing the environmental conditions from the time of notice against what conditions are forecasted to be in year 2012 or at the expiration of the proposed development agreement. The evaluation should also consider and evaluate how the Project will impact or alter the Airport’s passenger and general aviation operations, specifically in terms of capacity. The Draft CEQA document, as written, evaluates some but not all of the environmental impacts or scenarios associated with the Project and does so oddly in the year 2008. By evaluating environmental impacts in the year 2008, the Draft CEQA Document falls short of evaluating the totality of the Project’s environmental impacts at a time when the Airport’s operations will be maximized. Failure to consider the worst case scenario in terms of environmental impacts for a project is a violation of CEQA as such a practice may allow a project proponent to proceed without implementing otherwise needed, meaningful, and feasible mitigation measures.

2

The Draft CEQA Document Should Consider the Culmination of All Environmental Impacts Associated with the Proposed Project

Not only does the Draft CEQA document fail to consider environmental impacts at the correct baseline, the Draft CEQA Document fails to adequately consider all of the environmental impacts caused by the Project in an independent or cumulative nature. For example, the Draft CEQA Document fails to provide any analysis for the construction phase of the Project or provide any analysis for increased aviation operations for commercial and general aviation aircraft once Taxiway D is completed. Further, it assumes environmental benefits associated with the project for parking operations on the A-1 North Property in spite of efforts by the Authority and the City to relocate the Airport’s passenger terminal to the B-6 Trust Property in the future. Not only is this a violation of CEQA, the Draft CEQA Document fails to provide the public with adequate information to properly comment and evaluate the environmental impacts that may be caused by the Project. Further, the Draft CEQA Document’s failure to provide this information or to evaluate it openly may allow the Authority to proceed with the Project without the proper incorporation of much needed mitigation measures.

3

The Draft CEQA Document Fails to Consider Adverse Impacts Generated by Project-Related Fine Particulate Matter or Air Toxics Emissions

The Draft CEQA Document fails to consider any adverse impacts pertaining to air toxics or fine particulate matter that may be Project-related. Knowing that over 70% of the air toxics in the South Coast Air Basin are generated by diesel emissions, and that airports

4

are significant contributors to diesel particulates and air toxics, the Final CEQA Document should and must consider these adverse impacts on Airport workers and the surrounding residential and business community.

4
cont.

Completion of Taxiway D Increases the Airport's Aviation Capacity

The EIR needs to assume that the Taxiway D is fully utilized for aircraft operations and calculate emissions based on this full utilization -- as a worst case scenario -- and not merely consider whether the completion of Taxiway D will induce the demand of additional flights. The Draft CEQA Document clearly states on page A-10 that:

“Good runway to taxiway access minimizes the time that an aircraft operation blocks the runway, which makes the runway available more quickly for a subsequent arrival or departure. A runway with a full length parallel taxiway and appropriately placed taxiway exits allow for the specific type of aircraft operating at the airport to exit the runway quickly upon completing its landing roll out. A runway without a full length parallel taxiway may require that an aircraft back taxi on the runway to either access the runway end for departure or to exit the runway upon landing. This increases the time that the runway end for departure or to exit the runway upon landing. This increases the time that the runway is unavailable for a subsequent operation.”

5

Thus, by completing Taxiway D and creating a full length parallel taxiway, aviation capacity at the Airport can and will eventually increase the Airport's aviation operations over time. Again, CEQA requires that the applicant fully consider the worst case scenario for adverse impacts (i.e., the environmental impacts that could occur if Taxiway D is completed and is used at full capacity). The Draft CEQA Document's assumption that the completion of Taxiway D will reduce emissions from aircraft operations without taking into account maximal use is incorrect and a violation of CEQA.

Acquisition of A-1 North Property by the Authority Dedicates the Property Exclusively to Airport Use

The proposed acquisition of the A-1 North Property by the Authority dedicates the Property exclusively and irrevocably to airport use as long as the Authority chooses to retain the property. Thus, the project applicant cannot just claim that the acquisition of existing parking spaces simply acquires an existing use. For example, if the A-1 North Property was privately held outside of the Airport Authority's control, it is possible that the property could be converted to some other land use other than parking with less environmental impacts (e.g., a public park). Thus, the Draft CEQA Document should not and cannot minimize the environmental impacts caused by the proposed Project by stating that the existing use of the A-1 North Property is of a similar nature.

6

Document Speculates that Air Quality Emissions Benefits Will Be Derived from Relocation of Rental Facilities

The document assumes the Project will secure all rental car agencies currently operating in and around the airport as tenants and calculates emissions benefits from these operations occurring on the A-1 North Property. However, there is no guarantee that this

7

will actually occur unless the Authority can provide the public with existing contractual documents that demonstrate that all and future rental car companies operating at the Airport will become tenants at the proposed rental facility described in the Draft CEQA Document. If the Authority cannot provide the public with pre-existing contractual agreements, then the Draft CEQA Document cannot claim emissions benefits from the proposed rental center on the A-1 North Property and must mitigate the environmental impacts with meaningful and feasible mitigation measures.

7
cont.

Document Fails to Consider Traffic Impacts with Future Projects

It has been established that the intersection of Thorton and Hollywood Way will be impacted by access improvements that will be made by Caltrans to Interstate 5 to the Project area. Nonetheless, the Draft CEQA Document's modeling assumes that Airport access will dominantly occur via the Airport's Thorton and Hollywood Way entrance. However, it is not clear if the Draft CEQA Document has taken into account the changes to traffic patterns to and from the Airport when the Caltrans improvements to Interstate 5 are made. If the Draft CEQA Document has not done so, the Draft CEQA Document risks underestimating the environmental impacts (which include Transportation/Traffic) that may occur if the Project is approved and is fully implemented. This underestimation can eliminate the need for possible, feasible, and meaningful mitigation measure that may otherwise be required by the Project if it did consider this future alteration in travel patterns caused by the Caltrans proposed I-5 project.

8

Document Fails to Include and Require Meaningful Mitigation Measures Intended to Reduce Environmental Impacts Caused by the Proposed Project

Not only does the Draft CEQA document fail to consider the full environmental impacts of the Project on an independent or cumulative basis, it fails to propose needed, required, and meaningful mitigation measures for construction-related air emissions, parking operation-related air emissions, and aircraft operation-related emissions. We suggest the Authority consider and incorporate the following mitigation measures into its final document for each of the following categories:

A. Construction-Related Air Pollutant Emissions

9

The mitigation measures proposed by the Draft CEQA Document to reduce construction-related air pollutant emissions are noncommittal and insufficient to properly mitigate the emissions that will be generated from the construction of the Project. Not only should the Final CEQA Document clearly commit to all of the mitigation measures that it has laid out, it should also include:

- A firm commitment to retrofitting all construction-related diesel equipment with emission control devices equivalent to Level Two emission control devices as defined by the California Air Resources Board ("CARB"). Specifically, all devices used must reduce particulate matter ("PM") by at least 50% and oxides of nitrogen ("NOx") by at least 15%;

- A firm commitment that all fuel used on site must be Ultra Low Sulfur Diesel, 15 parts per million (“ppm”) or lower;
- A firm commitment that any exemptions to the above commitments be based on a written finding following market research and that the public, the local air district, NRDC, CCA, and CBE be notified as exemptions are granted. Further, a third party be identified to ensure compliance of construction-related air pollutant emissions mitigation measures.

9
cont.

B. Parking Operation-Related Air Pollutant Emissions

There are currently no mitigation measures proposed in the Draft CEQA Document to reduce parking operation-related air pollutant emissions in spite of questionable emissions accounting and benefits from certain facilities, apparent changes in future operations, and impacts identified from proposed bus operations. In fact, the preliminary draft dated August 23, 2004, references the use of hybrid electric buses in, “Table 4: Changes in Air Pollutant Emissions as a Result of the Proposed Project” as “Shuttle Buses Hybrid Electric” on page 23. Whether or not the Authority originally intended to use hybrid electric shuttles at one time to help mitigate parking operation-related air pollutant emissions on the A-1 North Property, clearly the Authority and the preparers of the Draft CEQA Document are aware that the use of shuttle buses at the facility will increase NOx emissions to existing conditions. We recommend that the Final CEQA Document include the following commitments by the Authority:

10

- Purchase or require alternative fuel shuttle buses or hybrid electric buses that meet the low optional NOx standards set by CARB and PM standards equivalent or lower than 0.03 grams per brake-horsepower-hour (“g/bhp-hr”) for all airport operations, including private rental car operations;
- Convert diesel medium- and heavy-duty vehicles operated by the Authority or Authority contractors. In other words, the Authority would convert vehicles operated by businesses with any type of contractual or license agreement with the Authority. Further, the Authority will achieve a 100% conversion to the cleanest available technology by 2010;
- Limit engine idling or queuing for all medium- and heavy-duty on-road and non-road vehicles at the Airport to five minutes on-site.

C. Aircraft Operations

Emissions impacts that will be caused by the increased efficiencies associated with the completion of Taxiway D have neither been analyzed by the Draft CEQA Document nor are there any proposed mitigation measures within the document to reduce these impacts. Although it is widely recognized that the Authority does not have the regulatory authority to reduce emissions from aircraft operations, we recommend the Authority adopt the following meaningful mitigation measures in the Final CEQA Document to reduce aircraft operation impacts:

11

- A firm commitment to gate electrification and hangar electrification. With respect to all contract passenger gates and cargo gates, the Authority will commit to achieve 50% electrification of its gates by 2007 and 100% conversion of existing gates by 2009. The cargo gates will also be subject to an assessment to determine technical exceptions to the electrification requirement.
- A firm commitment to convert 100% of existing and future ground support equipment ("GSE") on-site to electrical operation no later than 2006.

11
cont.

Conclusion

In conclusion, there are multiple deficiencies in the Draft September 23, 2003, Negative Declaration for Bob Hope Airport, both in terms of the underestimation of emissions and the analysis and adoption of feasible mitigation measures. Any one of these deficiencies would require the Authority to reject the Negative Declaration for the proposed Project if the Final CEQA Document fails to adequately address concerns outlined in this letter or commit to meaningful and feasible mitigation measures that can reduce the adverse impacts caused by the proposed Project. If you should have any questions, please do not hesitate to contact us at your earliest convenience.

Sincerely,



Gail Ruderman Feuer
Senior Attorney
Natural Resources Defense Council



Scott Kuhn
Legal Director
Communities for a Better Environment



Thomas Plenys
Transportation Policy Analyst
Coalition for Clean Air

Cc: Mr. Charles Lombardo, President, Burbank-Glendale-Pasadena Airport Authority
Honorable Marsha Ramos, Mayor, City of Burbank
Mary Alvord, City Manager, City of Burbank
Honorable Robert Yosefian, Mayor, City of Glendale
Honorable Bill Bogaard, Mayor, City of Pasadena

NATURAL RESOURCES DEFENSE COUNCIL / COALITION FOR CLEAN AIR / COMMUNITIES FOR A BETTER ENVIRONMENT

1. The commenter seeks analysis of the Authority's future facilities, and calls for preparation of a master plan. First, a master plan is beyond the scope of and not required for the proposed Project for which the Draft MND/IS was prepared. Further, the Authority does not have specific plans for future development at the Airport beyond those plans included in the description of this proposed Project. Identification of any potential future plans would be nothing more than speculation. CEQA requires analysis of "projects," and CEQA defines the term project to mean "the whole of the action" (CEQA Guidelines §15378(a)). Further, borrowing from the environmental impact report arena, all relevant parts of a project, including reasonably foreseeable future expansions must be analyzed. (Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal. (1988) 47 Cal.3d 376.) The project description included in the Draft MND/IS identifies all reasonably foreseeable development activities contemplated by the Authority. A master plan is not part of the proposed Project because the Authority has no plans to undertake such an activity. The commenter suggests that the Authority may have plans to construct a "replacement terminal on the B-6 Trust Property;" however, there are no plans for such a project at this time and any attempts at defining such a project would be pure speculation. Further, the terms of the Development Agreement prohibit the planning for or the construction of a new or relocated terminal for a period of ten years, so the assertion that the City of Burbank and the Authority have reached "consensus" on development of the B-6 Property is unfounded. The Draft MND/IS studied the complete proposed Project, and did not "chop" a larger project into smaller ones. The commenter's characterization of the "entire project" as "including, but not limited to, the relocation of a future replacement terminal" is inaccurate, as there are no present plans for development of a future replacement terminal. Please also see the responses to comment #9 of the City of Burbank letter and to comment #7 of the Philip and Carolyn Berlin letter.
2. It is not necessary to analyze the impacts associated with the level of passenger or aircraft operations activity that would occur at the conclusion of the Development Agreement because none of the project components would have any affect on the number of passengers or aircraft operations at the Airport. All of the changes to the environment that would occur as a result of the implementation of the various components of the proposed Project would occur once the project component was constructed. Thus, all impacts would be evident shortly after the Development Agreement is approved.

The number of forecasted aircraft operations for the year 2008 was provided in Table 5 on page 43 of the Draft MND/IS to further illustrate the changes in runway utilization that would occur as a result of the completion of Taxiway D. The year 2008 was chosen because it is consistent with the forecasts that have been previously published by the Authority in associated with the Federal Aviation Regulations (FAR) Part 161 Study.

48

3. As stated in Table 5 on page 43 of the Draft MND/IS and more fully explained in the response to comment #5, below, the completion of Taxiway D would not result in any changes in the number of aircraft operations at the Airport.

The commenter suggests that there are plans “to relocate the Airport’s passenger terminal to the B-6 Trust Property.” There are no plans for such a relocation and CEQA does not require analysis of hypothetical and speculative activities or project components. Contrary to the suggestion by the commenter, a lead agency must complete the necessary CEQA documentation prior to proceeding with a project, and this Draft MND/IS does not, nor is it intended to, study terminal relocation activity. Please also see the response to comment #7 of the Philip and Carolyn Berlin letter

4. The proposed Project would not result in any changes in the number of aircraft operating at the Airport or in the number of vehicles going to and from the Airport. Therefore, there would be no change in air toxic emissions as a result of the proposed Project and no further analysis is warranted.
5. Aircraft exit and enter Runway 8-26 via an existing parallel taxiway south of the runway (see Figures A-1 through A-4 in the Draft MND/IS). The construction of Taxiway D would provide a second parallel taxiway to the north of Runway 8-26 to allow FAA Air Traffic Control (ATC) the flexibility of segregating and directing General Aviation (GA) and cargo aircraft on the north taxiway. GA and cargo aircraft traverse the airfield to the west after landing on Runway 8 because the facilities that serve these operations are located on the west side of the Airport. In fact, the majority of GA aircraft, which account for more than 40 percent of total operations at BUR, are taxiing to or from the northwest quadrant of the Airport. This quadrant is where the two GA Fixed Base Operator (FBO) facilities and some of the cargo facilities are located. The proposed Taxiway D would allow ATC to separate the GA and cargo aircraft from the air carrier aircraft operating in the terminal area on the south taxiway and allow more efficient movement of the aircraft to or from their airfield parking locations. This segregation would reduce the runway crossings from two to one in many instances. Reducing the runway crossings would reduce congestion on the airfield, long wait times, and long taxi times, which in turn would reduce the overall emissions. Because aircraft currently use the existing south taxiway to exit Runway 8-26, the addition of a second parallel taxiway to the north would not increase the annual service volume ASV (overall capacity) at the Airport but rather improve airfield efficiency. The lack of increase to ASV is due to two considerations: (1) Runway 8-26 already has a full length parallel taxiway located to the south; and (2) the Airport is configured with a crosswind intersecting runway, Runway 15-33, which can release or accept a departing or arriving aircraft once an aircraft arriving to Runway 8 passes through the intersection of the two runways. This allows the Airport to continue to depart and land aircraft while the aircraft on Runway 8 exits to the taxiway.
6. The proposed acquisition of the A-1 North Property by the Authority must be approved by the City of Burbank pursuant to the requirements of Public Resources Code Section 21661.6. Part of this process requires identification of the planned use of the property. The

Authority has made known its plans to use the property for parking purposes. CEQA requires establishment of a baseline from which to measure impacts of a project, and in this case the existing parking use on the A-1 North Property is part of that baseline. (See CEQA Guidelines §15152(a).) The commenter requests speculation as to what other uses might be proposed in the future by a private property owner and approved by the City and then requests an environmental analysis using the speculated use as a baseline; however, CEQA requires no such speculation. Finally, recognition that the parking uses existing and approved for the A-1 North Property are similar to the parking uses proposed by the Authority should it acquire the A-1 North Property does not minimize environmental impacts but instead recognizes the proper baseline against which potential impacts must be measured.

7. As stated in Section B of this document, the Authority has decided not to include the development of a rental car center on the A-1 North Property. The changes in impacts associated with this decision are described in Section C of this document. The comment regarding the need to provide contractual documents committing rental car companies to use a consolidated rental car center to validate the assumptions use in the air quality analysis is no longer relevant given the Authority's decision not to develop a rental car center on the A-1 North Property. Therefore, no further analysis is required.
8. The proposed Project would not change the number of vehicles going to and from the Airport. The CalTrans project identified by the commenter would result in the construction of a northbound off-ramp from I-5 to Empire Avenue and the closure of the northbound off-ramp from I-5 to Lincoln Avenue. This would not affect the overall traffic benefits resulting from the proposed Project and the CalTrans project is not proposed as part of the proposed Project, nor influenced by the proposed Project. Even if the CalTrans project is approved, many persons will likely still wish to access the Hollywood Way / Thornton Avenue entrance to the Airport from northbound I-5 and surface streets through the City of Burbank will still be required to do so. The Authority's project to realign the eastbound approach to the Hollywood Way / Thornton Avenue intersection would result in an improvement to the intersection. Since neither the proposed Project nor the CalTrans improvements to I-5 would increase the number of vehicles accessing the Airport at the Hollywood Way / Thornton Avenue entrance, no traffic-related impacts would occur.
9. Please see the response to comment #1 of the South Coast Air Quality Management District letter.
10. As stated in Section B of this document, the Authority has decided not to include the development of a rental car center on the A-1 North Property. The changes in impacts associated with this decision are described in Section C of this document, which includes the conclusion that there would be no change in air pollutant emissions associated with the use of diesel buses because these buses no longer would be needed to provide access between the passenger terminal and the rental car center. As a result, operation-related air pollutant emissions would be reduced from the current emissions at the Airport and construction-related emissions are not significant. There is no need to implement any

mitigation measures associated with the use of shuttle buses at the Airport and no further analysis is required.

11. It is anticipated that Taxiway D would increase the airfield efficiency and therefore reduce the aircraft emissions. Aircraft taxi times should be reduced and ground holding time minimized after landing. Therefore, aircraft will reach the parking aprons sooner, which will allow the engines to be shut down more quickly. Since constructing the taxiway would reduce aircraft-related emissions, no significant impacts would occur and no mitigation measures are necessary.

RECEIVED

OCT 18 2004

ADMINISTRATION

October 14, 2004

Eden Rosen

1021 W. Clark Avenue Suite #A

Burbank, CA 91506-2017

818-848-7650

RosenEden@hotmail.com

http://members.tripod.com/eden_online

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena
Airport Authority
2627 Hollywood Way
Burbank, CA 91505

RE: Bob Hope Airport Development Agreement & Related Actions: Notice of Intent to Adopt a Mitigated Negative Declaration & Initial Study

Dear Mr. Feger:

I am writing in regard to the above mentioned document. I disagree with many of the points contained therein.

First, any time you expand a business or an airport, there will be effects from that expansion. This proposed deal is an expansion by Webster's definition. On page 48, the study states, "Short-term noise impacts would result from construction activities that would be temporary." Further to this paragraph, it states, "Pursuant to CEQA Guidelines section 1507(e), the project would not result in a safety hazard or noise problem for persons using the airport or working in the proposed area." I would say that there would not be hearing problem if the noise is under 65dB, but whether or not the noise is below 65 or not, there is the possibility of the psychological effects of noise.

While hearing protection may not be needed for 65 decibels, noise can cause irritability, heart conditions, stress, etc. depending on the person. There is not one thing in this negative declaration that states anything as to the definition of short term. Short term can be for a few hours, days, weeks, months, etc. Noise doesn't have to be loud to be irritating and cause health problems for people. For example, noise from an even mellow piano can cause problems for people. A person might also have problems with someone typing on an old typewriter that makes noise. I studied noise pollution for over 14 years and I am currently reading up on it as well. Basically, it still goes back to whether the noise is a necessary or unnecessary noise. Noise also affects different people in different ways. What might affect one may not affect another. So, there really isn't any way that any study can say that noise will not have an impact on any one person. Also, there is nothing in this document that states specific times of operation. Are they going to do construction at night like CalTrans does with the diamond lanes? Are they going to do construction only during the day and if so, what hours? There are a lot of unanswered questions and vague statements. It is only under traffic movement that mentions non-specific work hours. (See third to last paragraph).

Further to this document page 17 states that the proposed development agreement that the City would concurrently adopt a revised Municipal code provision applicable to new single family homes located within the 65 db Community Noise Equivalent Level contour. This provision would require the builders of new residential structures to provide sufficient acoustical treatment to ensure that interior noise would not exceed a 45 dB CNEL noise level. Obviously, the noise will impact the surrounding neighborhood.

Since the City will have to revise the Municipal Code, for new builders to provide sufficient acoustical treatment, this means that this project does indeed impact those in the area of the airport. Therefore ergo; the statement that this project does not have any noise impacts is contradictory and illogical. Aside from that, the new builders will take care of the noise issues, but what about the people who are living around the airport at this current time? There is not one sentence pertaining to the current residents of the neighborhoods surrounding the airport.

1

2

I also found other contradictory statements in the document. On page 14, it states that there will be new rental car company offices, counters, and restrooms for rental car customers. The new building would enable an increase in the number of on-Airport rental companies. Also, on page 14, a new valet parking plaza and new valet building will be built as well. The valet building will be a one-story structure of 3200 square feet. Then, on page 15, there is mention of a rental car center parking structure on the A-1 property. On page 3, there is some information about these new buildings and the project as well.

However, on page 50, the document states that there are no significant new buildings or structures or public service demand-generating activities associated with the implementation of the proposed Project. No new buildings? It further states that the Airport has its own police department that handles all police protection services at the Airport. The proposed Project would not result in additional police protection services compared to the existing conditions. The explanations do not even discuss impacts in regard to the Fire Department should a worst case scenario happen at the Airport—a plane crashes, another plane slides off the runway, which by the way had been proven to be pilot error, and almost hit gas tanks at a gas station in the process.

In the worst case scenarios, Airport Police will not be enough and the Airport will have to rely on Burbank Police Department for assistance. Between pilot error and other issues how can you say with such certainty that this Project will not affect the Police and Fire Departments? I don't believe that you can. More cars, more people, more buildings, etc. increases the chance for terrorism. Before you dismiss this statement, it already has been proven via studies that long lines increase the chance of terrorism at an airport.

The only information about construction times, is listed on page 58. These are also quite vague. It states, "Because construction-generated trips are expected to be spread more-or-less evenly throughout a construction workday, impacts on peak hour traffic likely would be limited." It further states that critical construction that would otherwise create congestion is to be done after normal airport passenger terminal operating hours. This must mean that work will be done at night as well as in the day time. Sound travels faster and louder in the still of the night so I would wager this project will disturb people in the surrounding residential areas.

Last, but not least there is Taxiway D. In this document there is a sentence that pollution will decrease since the planes won't be idling as long. While that may be the case, there will be more planes stacked on the taxiway idling their engines until the tower gives them the approval to taxi to the runway. Since there will be more planes idling, it will cause more pollution.

This is an expansion of the Airport, pure and simple that puts into motion a plan for a 27 gate terminal as soon as this plan expires in seven years. According to my gut feeling, the vagueness and lack of specific information, I am not going to endorse this deal with the City.

Sincerely,



Eden Rosen
Author, Speaker, Advocate
Employer/Employee Relations, Customer Service, Healthcare, Ethics

EDEN ROSEN

1. As stated on page 38 of the Draft MND/IS, construction activities would "...take place in accordance with the provisions of the City of Burbank's Noise Control Ordinance. Therefore, this would not be a significant impact." Also, as stated on pages 38 and 39 of the Draft MND/IS, the noise levels generated by construction equipment would not be significantly greater than the noise levels frequently experienced in surrounding land uses. In addition, the Draft MND/IS acknowledges that there are no noise sensitive land uses in the vicinity of any of the project component sites. Therefore, this is a less-than-significant impact.
2. The potential for aircraft noise impact on current residents of the neighborhoods surrounding the Airport as a result of the project was assessed in accordance with CEQA guidelines using the State of California Community Noise Equivalent Level (CNEL) standard and the Federal Aviation Administration's (FAA) thresholds of significance contained in FAA Order 1050.1E. Changes in aircraft noise exposure due to the proposed Project are very slight and do not exceed the FAA's thresholds of significance. As stated on page 44 of the Draft MND/IS, the results from the Integrated Noise Model (INM) runs show that the completion of Taxiway D would result in a negligible increase in the overall area within the 65 dB CNEL in the Airport vicinity and that the number of acres of residential uses within the 65 dB CNEL would decrease. In addition, none of the changes to the noise environment as a result of the completion of Taxiway D would equal or exceed the 1.5 dB threshold of significance within the 65 dB CNEL contour or the 3 dB threshold of significance in the 60-65 dB CNEL contour.
3. The statement on page 50 of the Draft MND/IS that no new significant buildings would be constructed as a result of the proposed Project is based on a determination of whether there would be any new facilities that could affect police and fire protection services at the Airport. These two new buildings would not result in any changes in demand for police and fire protection services or the manner in which those services are provided at the Airport.

The proposed Project would not result in any changes in the number of passengers at the Airport and would not result in any changes in the potential for accidents to occur at the Airport. While it is acknowledged that an incident at the Airport could result in demands on police and fire protection, the proposed Project would not be the cause of such an incident. Therefore, the statements in the Draft MND/IS regarding police and fire protection are correct.

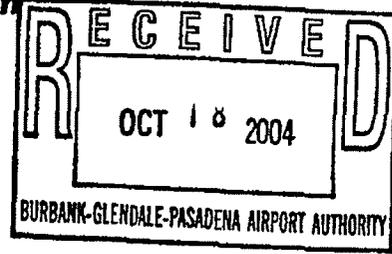
4. As stated on page 57 of the Draft MND/IS, "...critical construction that would otherwise create congestion is to be done after normal airport passenger terminal operating hours..." In addition, page 38 of the Draft MND/IS states this construction activity would "...take place in accordance with the provisions of the City of Burbank's Noise Control Ordinance. Therefore, this would not be a significant impact.

5. The proposed Project would not affect the number of aircraft operations at the Airport (please also see the response to comment #10 of the City of Burbank letter). Therefore, the commenter's conclusions regarding additional planes using Taxiway D and creating an air quality impact are not correct.

Philip and Carolyn Berlin

408 N. Niagara Street
Burbank, CA 91505-3650
818.848.6070

October 16, 2004



Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, CA 91505

Re: Bob Hope Airport Development Agreement (unavailable) and Related Actions
Notice of Intent to Adopt a Mitigated Negative Declaration and Initial Study 09/23/04
Remarks, Comments and Objections to Adoption of Mitigated Negative Declaration

Dear Dan:

The Burbank/Bob Hope Airport is known as a "regional airport" and a "reliever airport for LAX", therefore, this development agreement and any project under California Environmental Quality Act (CEQA) requires a public review and comment period of 30-days, not the 20-day review period arbitrarily placed on this Mitigated Negative Declaration ("MND") and Initial Study. The period for review and comment would be 20 days if the lead agency is the only agency that will review the MND. However, in this instance at one other agency, the Los Angeles County Airport Land Use Commission will be reviewing the MND and the Airport's plans (or lack thereof). Accordingly, 30 days was necessary for the public's review of the MND. See Pub Res C§21091(b); 14 Cal Code Regs §§15072-3, 15105(b). We object to the shortened time allowed for public review and comment and request that a full 30-day period be initiated. Since people have been misled as to the time afforded for public review, the 30-day period should commence anew at the earliest opportunity. Further, the entire process under CEQA is flawed until such time as the Development Agreement which would fully describe the project and its uses and restrictions is provided to be reviewed concurrently with the MND.

The MND makes repeated references to a Development Agreement which has not been provided for public review. The Development Agreement is an integral part of the MND. Without it, a meaningful review of the MND by the public is meaningless. Informed decision making and public participation are fundamental purposes of the CEQA process. See *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 C3d 553, 276 CR 410; *Laurel Heights Improvement Ass'n v. Regents of the Univ. Of Cal.* (1988) 47 C3d 376, 253 CR 426; *No Oil, Inc. V. City of Los Angeles* (1974) 13 C3d 68, 118 CR 34. Without the Development Agreement the Airport is pushing for approval of its project. Even its attorney admitted in open court that a resolution of the base legal dispute between it and Star Park need not be resolved until July 2005. Accordingly, there is more than ample time for the Airport and Burbank to remove the secrecy

1

2

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 2

behind the Development Agreement so that the public can be assured the environment is being protected. See *County of Inyo v. Yorty* (1973) 32 CA3d 795, 810, 108 CR 377, 387.

2
cont.

Apart from the premature submission for public review of the MND because of the absence of the integral Development Agreement, the absence of this Agreement enhances the already strong presumption in favor of requiring preparation of an Environmental Impact Report (EIR). If any aspect of the project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. 14 Cal Code Regs §15063(b)(1). There is, therefore, a low threshold for requiring preparation of an EIR. *Citizen Action To Serve All Students v. Thornley* (1990) 222 CA3d 748, 754, 272 CR 83; *Sundstrom c. County of Mendocino* (1988) 202 CA3d 296, 310, 248 CR 352. As you know, the fair argument standard prevents the lead agency from weighing competing evidence to determine who has a better argument concerning the likelihood or extent of a potential environmental effect.

The absence of detail of what is to be built, as well as the absence of the Development Agreement, makes the “public review” of the MND a sham. With this information, we believe significant effects can be shown by this project. Under 14 Cal Code Regs §15065 an agency must find that a project may have a significant effect on the environment and thus must prepare an EIR if the project meets any one of the following conditions:

3

- It has the potential to degrade substantially the quality of the environment. PRC§21083(a); 14 Cal Code Regs §15065(a).
- It has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. PRC§21083(b)(1); 14 Cal Code Regs §15065(b).
- It has possible environmental effects that are individually limited but cumulatively considerable. PRC§21083(b)(2); 14 Cal Code Regs §15065(c).
- It has environmental effects that will cause substantial adverse on human beings, either directly or indirectly. PRC§21083(b)(3); 14 Cal Code Regs §15065(d).

An initial study must consider all phases of project planning, implementation, and operation, including phases planned for future implementation. 14 Cal Code Regs §15063(a)(1). This rule follows logically from the principles that the “whole of the action” that may result in a physical change must be considered (14 Cal Code Regs §15378(a)) and that environmental analysis should not be deferred. PRC§21003.1. Under this rule, the Airport may not limit environmental

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 3

disclosure by ignoring the development or other activity that will ultimately result from an initial approval. *City of Antioch v. City Council* (1986) 187 CA3d 1325, 232 CR 507. Preparing a proposed MND “necessarily involves some degree of forecasting,” and the lead agency “must use its best efforts to find out and disclose all that it reasonably can” 14 Cal Code Regs §15144.

Unfortunately, the Airport has chosen to conclude that there are no significant impacts from the project and what few there are have been mitigated. In doing so, the Airport has purposefully chosen to ignore CEQA’s definition of significant effect. An effect on the environment need not be “momentous” or “important” to meet the CEQA test for significance. The term “significant” covers a spectrum ranging from “not trivial” through “appreciable” to “important” and even “momentous.” *No Oil, Inc. v. City of Los Angeles* (1974) 13 C3d 68, 83, 118 CR 34. An effect need not be either long-term or permanent to be significant. *Running Fence Corp. v. Superior Court* (1974) 51 CA3d 400, 416, 124 CR 339.

An EIR must be prepared whenever it can be “fairly argued” that the project “may have” a significant environmental impact. *No Oil, Inc. v. City of Los Angeles* (1974) 13 C3d 68, 118 CR 34. The question for the Airport, which it sadly ignored with the support of the City of Burbank is not whether significant impacts will occur, but whether a fair argument can be made that they might occur. CEQA places the burden of environmental investigation on the public agency rather than on the public. If the agency fails to evaluate a project’s environmental consequences, it cannot support a decision to support a MND by asserting that the record contains no substantial evidence of a significant adverse environmental impact. *Sundstrom v. County of Mendocino* (1988) 202 CA3d 296, 311, 248 CR 352, 361. The Airport will not be allowed to hide behind its own failure to gather data. *City of Redlands v. County of San Bernadino* (2002) 96 CA4th 398, 117 CR2d 582.

Further, the Airport has chosen to take a myopic view of significant impacts and ignore the required analysis of indirect impacts. When evaluating the significance of a project’s environmental impacts, the lead agency must consider direct physical changes in the environment as well as reasonably foreseeable indirect physical changes in the environment. 14 Cal Code Regs §15064(d). The environment to be considered includes the area in which significant effects would occur, directly or indirectly. 14 Cal Code Regs §15360. An indirect impact is a physical change in an environment that is not immediately related to the project but that is caused indirectly by the project. 14 Cal Code Regs §15364(d)(2). Indirect impacts can occur when a direct change in the environment results in other, secondary changes in the environment. 14 Cal Code Regs §15364(d)(2). Indirect impacts can also occur when a project’s special or economic effects result in a foreseeable physical change in the environment. 14 Cal Code Regs §15364(e).

3
cont.

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 4

An EIR must be prepared if a project will result in reasonably foreseeable indirect physical changes that may have a significant adverse effect on the environment. *City of Livermore v. LAFCO* (1986) 184 CA3d 531, 230 CR 867; *Stanislaus Audubon Soc'y, Inc. v. County of Stanislaus* (1995) 33 CA4th 144, 39 CR2d 54.

3
cont.

We understand CEQA and its regulations to require a lead agency to consult informally with all responsible agencies and trustee agencies and obtain their recommendations on whether an EIR or MND should be prepared. Did the Airport so consult with Burbank and did Burbank agree with the Airport that a MND was appropriate? At any time prior to October 12, 2004 did Burbank through its Council, City Manager or staff indicate to the Airport or its staff that a MND was acceptable? If yes, when was that acceptance communicated and by whom? Please provide the undersigned with all correspondence between Burbank and the Airport and their respective staffs regarding a ND or MND for the instant project.

Has the Airport conducted a review of all of the environmental documents prepared by Mr. Full, its environmental consultant? The Airport is required to independently review and analyze environmental documents prepared by consultants. Documents such as initial studies, which are circulated for public review, must reflect the agency's independent judgment. PRC §21082.1(c).

4

Has the Airport consulted with transportation planning agencies and agencies that have transportation facilities that could be affected by the project? This project is of "statewide, regional, or areawide significance." Accordingly, the Airport should have consulted with transportation planning agencies and agencies that have transportation facilities that could be affected by the project. PRC§21092.4. Assuming that the Airport has not done so, has no intention of doing so, or will do so in the future, the commencement of the public review of this MND is premature.

Any project that requires review under CEQA must disclose worst case scenarios to meet the minimum requirements with appropriate mitigation discussed. The document is entitled "Bob Hope Airport Development Agreement and Related Actions"— Notice of Intent to Adopt a Mitigated Negative Declaration and Initial Study, dated September 23, 2004. Yet, the public comment period is ending on Monday, October 18, 2004 and here it is the Saturday, October 16, 2004, and a Development Agreement has never been produced for public review and comment to even be able to analyze whether the points in the Development Agreement are even noted, much less analyzed and the impacts considered. This is wholly inadequate and flies in the face of all that CEQA represents.

5

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 5

We object to the piecemealing of a project that is being deceptively disguised and disclosed as a “transfer of a parking lot from a private developer to the Airport” that is already in existence. In fact, the Airport seeks to change the operations, construct underground roadways as well as realign entry into the Airport. The use of the lot and all the alterations has not been fully disclosed and analyzed. Their actual plans for the future uses of the areas that will be vacated, and uses that will be transferred have not been disclosed, nor have the impacts of such new uses. For the purposes of CEQA coverage, a “project” is defined as comprising “the whole of an action” that has the potential to result in a direct or reasonably foreseeable indirect physical change to the environment. 14 Cal Code Regs §15378(a). The term “project” refers to the entire activity for which approval is sought, not to each separate discretionary governmental approval that may be required for the activity to occur. 14 Cal Code Regs §15378(c). Under this broad definition, an agency must describe a project in a manner that will encompass the entire activity’s potential impacts. Lead agencies may not avoid preparing an EIR by segmenting a project into stages of approval, focusing on isolated parts, and not considering the entirety of the project. The definition thus prevents agencies from chopping a large project into smaller ones, each with a minimal impact on the environment, to avoid full environmental disclosure. This is exactly what the Airport has done — with the support of the City of Burbank. 14 Cal Code Regs §15003(h). *Bozung v. LAFCO* (1975) 13 C3d 263, 283, 118 CR 249. Indeed, one council member was quoted in a recent newspaper article that the Mitigated Negative Declaration would be approved by the City. Under this definition, although a project may go through several approval stages, the environmental review accompanying the first discretionary approval must evaluate the impacts of the ultimate development authorized by that approval. It is irrelevant that the development may not receive all necessary entitlements or may not be built. Piecemeal environmental review that ignores the environmental impacts of the end result is not permitted. *Christwood Ministry v. Superior Court* (1986) 184 CA3d 180, 193, 228 CR 868; *City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 CA3d 229, 251, 227 CR 899.

6

Any increase in the parking use, the roadway undergrounding and realignment that creates additional vehicular trips or interrupts the normal flow of traffic in the area requires a formal traffic study and analysis to make any determination. The MND is absent any traffic analysis. Further, while the Airport has claimed a reduction in trips, this is misleading in light of the Airport’s publicly stated objective of relocating the terminal building to the B-6 property which will actually create increases in traffic and pollution in and around the Airport both during and following the proposed construction. This MND fails to properly analyze and evaluate the negative impacts of the proposed undefined development on B-6. Absent this information the MND is deficient and does not disclose the worst case scenario.

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 6

Initial Study and Negative Declarations

If there is a possibility the project may have a significant effect, the agency undertakes an initial study. If that study demonstrates it will not have a significant effect, the agency may issue a negative declaration. The evaluation of a project focuses on the impacts it will have on the existing physical environment. *Environmental Planning v County of El Dorado*, 131 Cal. App.3d 350 (1982)¹

The physical environment is being altered by the realignment of the roadway and access to Star Park facilities with another underground roadway. Since the full impacts of the project are not disclosed, the mitigation described is insufficient to meet the requirements of a “mitigated” negative declaration.

The conclusions reached in an initial study must be supported by data or another explanation, i.e., traffic studies, aesthetics, architectural plans and drawings, etc. A mere checklist is insufficient. *Citizens Association for Sensible Development of Bishop Area v County of Inyo*, 172 Cal. App. 3d 151, 217 Cal. Rptr. 893 (1985); *Sundstrom v County of Mendocino*, 202 Cal. App. 3d 296, 248 Cal. Rptr. 352 (1988).

Negative Declaration vs Environmental Impact Report

There has been ample public statements both in print and orally that both the Airport and the City of Burbank have agreed that the B-6 property is the preferred site for a relocated terminal project. Indeed, it was referenced in writing in the recently discovered October 2001 letter from then City Manager Robert Ovrom to Airport Executive Director Dios Marrero. Therefore, by not requiring the Airport to sell the B-6 property by 2000 as was intended in the court documents and Trust Agreement, the Airport is disguising the intention of a full relocated terminal project by piecemealing additional parking and the use of the B-6 property during the interim planning of a much larger project that under any definition requires a full Environmental Impact Study since as few as 14 gates to as many as 34 gates have been discussed over the last decade, with a finalized EIR and Record of Decision issued by the FAA for a 19-gate terminal to be followed by a 27-gate terminal on the very site in question.

“The Capacity Needs in the National Airspace System, An Analysis of Airport and Metropolitan Area Demand and Operational Capacity in the Future prepared by the U.S. Department of Transportation Federal Aviation Administration, The MITRE Corporation Center for Advanced Aviation System Development dated June 2004”² states:

“The Government’s most significant and challenging role in this dynamic environment is

7

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 7

to examine where the requirements are and to work for the development of the infrastructure and capacity to accommodate whatever level and type of demand the market may bring.”

It further states on page V ... 15 airports are identified as needing additional capacity by 2013 based on federally planned expansion. These 15 airports are not in alphabetical order, however, the second on the list is Bob Hope (Burbank, CA). Additionally, on page VI of this same report, Burbank is once again listed for expansion for handling additional capacity in 2020.

These statements at a local and federal level make necessary the requirement for a full Environmental Impact Report to define the intended project, its impacts and mitigation prior to any approvals of further acquisition of Star Park (A-1)'s 3,000 parking spaces and use of B-6 acreage. The highest and best use for the property for the people of Burbank is being overlooked and the financial burden to the City's infrastructure as well as the loss of millions of dollars annually in property taxes, sales tax and related private development revenue stream that would flow directly to the City of Burbank is being completely overlooked with the burdens of an expanded environmentally polluting Airport being placed upon this residential community.

To meet the fiduciary responsibility of governing and representing its constituents, the City of Burbank must undertake a study of the impacts on the infrastructure and overall negative financial impacts to the City of Burbank before allowing the Airport to acquire additional land and expanded land use.

Further impacts of a relocated terminal have not been disclosed relating the easterly takeoffs. Absent this information and an analysis of the potential for a relocated terminal on B-6, this MND is deficient and does not disclose the worst case scenario to the businesses and residents of Burbank.

Lack of Appraisal to Spend Public Money

While the Airport has stated publicly their intent to acquire Star Park for \$41 Million, they have also publicly stated they have failed to obtain an appraisal of the property. The "Land Acquisition For Public Airports" circular prepared by the U. S. Department of Transportation Federal Aviation Administration.³ states in part:

“How Will The Airport Owner Determine The Value of Your Property?
Prior to making an offer to purchase, the airport owner will arrange for a competent, independent, real property appraiser familiar with local property values to appraise your

7
cont.

8

9

10

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 8

property. The appraiser will inspect your property and set forth an opinion of its current fair market value in a formal appraisal report. This report will be reviewed by a review appraiser for conformance to acceptable appraisal standards and FAA requirements. After the report is approved, it is used as the basis for the airport owners written offer to purchase your property.”

10
cont.

The Airport has not followed this appraisal prerequisite as required in the Uniform Relocation Assistance and Real Property Acquisition Policies Act. Accordingly, it appears the Airport is about to spend public monies inappropriately and illegally to acquire Star Park.

As the project relates to the proposed Taxiway, granting the Airport the ability to construct this taxiway will allow pilots, on their own initiative without direction from the Air Traffic Controllers, to leave a gate and proceed to the taxiway. It defies logic for the Airport Authority to conclude without further analysis that air traffic would not increase thus increasing pollution and noise with gates having the ability to be turned around more quickly the capacity of the airport can be substantially increased. [Included by reference *see City of Los Angeles vs. Burbank-Glendale-Pasadena Airport Authority*, California Court of Appeals Case No. B083034, 1998, Footnote 3.]

There has been no disclosure as to the number of planes that could occupy the proposed taxiway, the length of time each plane could be idling, the amount of jet fuel and pollutants that would be produced, the additional passengers that would be accommodated, the number of additional automobile trips and their effects on Hollywood Way and other local streets and arterials and the quicker push back time from the gate or gate turnover that would allow increased air traffic at the airport, and the cumulative impacts of planes landing simultaneously. All these items should be analyzed as well as their cumulative impacts one to the other. The omission of this analytical information subverts the purposes of CEQA by omitting necessary information from the environmental review process. *Kings County Farm Bureau v City of Hanford* (1990) 221 Cal.App.3d 692. Absent this information, the MND is deficient and does not disclose the worst case scenario.

11

Burbank-Glendale-Pasadena Airport Capacity Analysis

Although claimed to be for “safety and efficiency” with the application for the proposed TaxiWay D, there has been no analysis as to the cumulative impacts of prior taxiways added to the Airport, and the additional and cumulative impacts to the Burbank-Glendale-Pasadena Hypothetical Airport Capacity Analysis — Runway, Gates, Noise.⁴ While this Analysis was prepared for discussion purposes only, other taxiways have been added since that time and in

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 9

1991 this FAA Study stated the ability to have 55 operations per hour within a 24 hour period, or 1,320 total operations per day of all aircraft types. However, the assumptions for gate turnaround time was based on 45-minutes, yet for sometime Southwest Airlines has prided itself in a successful gate turnaround of 30 minutes. Therefore, the Gate Capacity projections for a worst case scenario are underestimated in this 1991 Capacity Analysis. Since the concept of obtaining a Mandatory Curfew the alternatives of maximum operations of 825 per day would no longer be feasible. If there is a current Hypothetical Airport Capacity Analysis it should be made public and part of this environmental review, otherwise, an updated analysis should be forthcoming to provide the public with the worst case negative impacts analysis of adding TaxiWay D. The assumptions in this 1991 Analysis projected the possibility with a Mandatory Curfew of 10,000,000 annual passengers. This MND is deficient without an updated analysis of Runway, Gates, Noise Analysis with the proposed addition of TaxiWay D and prior taxiway additions.

11
cont.

Passenger Access to the Terminal Building from A-1 Property

The MND indicates that the property would be used for a rental car building, valet parking and long term public parking. The MND does not define the square footage and details of these structures to be constructed. Further, the MND does not address the safety hazard that would come from passengers accessing the terminal building by walking from the parking lot to that building. Absent that focused analysis the MND is deficient.

12

Cumulative Impacts of Foreseeable Projects

There has been no analysis of the three fast-food restaurants that have applied for permits last year to do business on the property that will be retained by Zelman on the A-1 site, Hollywood Way frontage. Presumably, each of these restaurants will have a drive-through component which would exasperate the impacts of the Airport's development on the A-1 site. Without analysis of these proposed projects one cannot determine, as an example, where these restaurants' required parking are to be located. Absent these impacts being addressed, the MND is deficient and does not disclose the worst case scenario.

13

On page 17, last paragraph, second sentence states:

“The Authority would not construct any public vehicle parking facility in the southwest quadrant of the Airport for four years after completion of the A-1 North Property Acquisition project component.”

14

The southwest quadrant is a sizeable piece of property and at one time was being considered as an alternative site for a future 14-gate terminal building. Non disclosure of a parking layout,

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 10

number of spaces, and environmental impacts makes this MND deficient and unacceptable regardless of the fact that it is projected to be built in four years. To simply state something won't be built for four years in no way identifies or mitigates the impacts of the project.

14
cont.

Further, the final sentence of this paragraph states:

“The development agreement *contemplates* that the Trust Property could be used for non-airport development consistent with existing zoning.”

This provides neither identification of any uses, nor does it identify any environmental impacts of any uses this parcel of approximately 70 acres could accommodate. All uses were abandoned several years ago because it was severely contaminated as were the demolished buildings. Further, there is no mention of complete clean up of this “brown field site”. The mitigation referenced appears only to relate to clean up on areas of excavation which is wholly inadequate and will continue to contaminate Burbank’s groundwater. This entire B-6 site needs to have appropriate soils testing and cleanup as was done with the Empire Center site. If necessary a vapor extraction system may be appropriate to clean the site, but this cannot be analyzed without sufficient soils testing and responsible efforts to cleanup of the site. To consider a MND adequate as to cleanup of a “brown field site” is negligent, particularly in light of the statements made that nothing would be built for 10 years which would presumably should include the construction of a vapor extraction system.

15

Addition of Taxiway D

From the diagram of the proposed Taxiway D to run parallel to the easterly runway, it appears on its face that more planes will be in the immediate proximity to the east-west runway decreasing safety while increasing the confusion as the planes cross the east runway to either depart or access the runway causing the potential for a serious accident. This “increased safety and efficiency” described in the MND could likely cause the FAA to step in and demand the terminal be relocated to B-6 in short order to eliminate the unnecessary crossing of a runway by planes departing or accessing the terminal building. This taxiway appears to be designed for a relocated terminal building on the B-6 property and is totally and wholly inappropriate until such time as that plan may be environmentally reviewed. The Airport’s conclusion that Taxiway D provides a safer environment is a conclusion without analysis. An analysis must be prepared by the FAA and provided to the public. Accordingly, the Negative Declaration is deficient in this regard.

16

Construction Timetables

The MND refers to the relative short duration for construction and its temporary nature. The

17

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 11

Airport has chosen in assessing the environmental impacts separately to each construction component rather than combining the cumulative effects of concurrent construction projects. It is unclear whether each project will follow another, or will be done simultaneously. Absent such analysis, the MND is misleading and deficient and does not disclose the worst case scenario.

17
cont.

Noise and Health Issues

Attached are three health related bulletins^{5, 6, 7}, the MND is deficient absent an analysis of the Airport's impact on the proximity to the residential homes and sensitive receptors of children and others who are impacted by jet fuel pollution as well as vehicular trips that adding one additional flight, or one additional plane idling on the proposed taxiway will create.

How does the Airport intend to respond to the recent "FAA Issues Revised Noise Sensitive Area Advisory Circular AC No. 91-36D" which references overflights over residential communities, national parks, schools, churches and other noise sensitive areas? In essence, it states that, "avoidance of noise-sensitive areas, if practical, is preferable to overflight at relative low altitudes" over homes, schools, churches, parks, etc. It further states that "pilots operating noise producing aircraft (fixed-wing, rotary-wing and hot air balloons) over noise sensitive areas should make every effort to fly not less than 2,000 feet above ground (AGL), weather permitting."

18

A-1 Parking

The MND on page 9 is vague and ambiguous regarding the utilization of proposed parking by the Airport. Greater specificity would be appropriate to analyze the impacts of Star Park parking which is currently very specific in its use. The MND is deficient without an analysis of worst case scenario impacts.

19

Successor Uses

There has been no identification of what use is to be put to that space previously utilized for among other things, rental car facilities. To adequately and legally analyze the effects of those successor uses they must be identified and defined. A description of the areas and the impacts of idling vehicles must be analyzed to provide cumulative impacts. Absent this analysis the MND is deficient without analysis of worst case scenario impacts.

20

Cumulative Traffic Volumes

The findings in an initial study are not dispositive when the Airport's study does not disclose the evidence relied on in the study, at least on dispositive issues. *Sundstrom v. County of Mendocino* (1988) 202 CA3d 296, 248 CR 352; *Citizens Ass'n for Sensible Dev. V. County of Inyo* (1985)

21

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 12

172 CA3d 151, 217 CR 893. The Airport Authority has made conclusionary remarks that the project does not contribute to the worsening of cumulative traffic impacts. However, it appears that no traffic study was conducted to support this conclusion. If there were such a study, a copy should be attached to the MND. Traffic studies are basic routine requirements for parking facilities.

21
cont.

Mitigation #5: Construction-Related Traffic

This list does not include identification and approval of haul routes or covering of vehicles used for hauling contaminated dirt from the site.

22

XVIII. Mandatory Findings of Significance

a) The project has the potential to degrade the quality of the environment in a potentially significant impact based on the lack of identification and specificity of uses, site cleanup, additional jet fuel from idling planes on Taxiway D, vehicular traffic resulting from increased capacity, as well as construction vehicles, interference with traffic flow during construction of undergrounding a roadway and realigning Airport access.

b) The project description has not identified all of the cumulative impacts of its own project nor has it identified the cumulative impacts of related projects in the area and the impacts of new successor uses; therefore, potential for significant impacts remain until specifics are forthcoming and appropriate analysis has been conducted.

23

c) The project has potentially significant environmental effects which will cause substantial adverse effects on human beings directly when they are traveling to and from or utilizing the terminal facility and indirectly on individuals in the general area.

Many of the impacts will not be temporary and have not even been identified, nor has analysis or study been undertaken that would provide adequate review and analysis.

Respectfully submitted,


Philip E. Berlin


Carolyn Berlin

Enclosures

Agency staff must be careful to ensure that the conclusions reached in the initial study are supported by data or another explanation. A mere checklist is insufficient. *Citizens Association for Sensible Development of Bishop Area v. County of Inyo*, 172 Cal. App. 3d 151, 217 Cal. Rptr. 893 (1985); *Sundstrom v. County of Mendocino*, 202 Cal. App. 3d 296, 248 Cal. Rptr. 352 (1988).

The Decision to Prepare an EIR

If the project may have a significant effect on the environment, an EIR is required. The lead agency must determine if the project will have substantial effect on the environment based on substantial evidence in the record.

The courts lean strongly in favor of EIR preparation. Whenever it can be “fairly argued” on the basis of substantial evidence in the record that a project will have a significant environmental impact, an EIR is required. Mere public controversy over the project, without substantial evidence of the environmental effects, will not require the preparation of an EIR. *Citizens Association for Sensible Development of Bishop v. County of Inyo*, 172 Cal. App. 3d 151 (1985) and Public Resources Code § 21082.2.

Numerous cases have attempted to clarify what information constitutes “substantial evidence,” especially in controversial situations. CEQA now requires that substantial evidence be based on facts and reasonable assumptions rather than speculation, unsubstantiated opinions or inaccurate evidence. Public Resources Code §§ 21080(e), 21082.2(c).

Making the EIR/Negative Declaration Call

Whether to do an EIR or a negative declaration is sometimes a difficult decision. If a person or group comes to a planning commission or city council meeting and says the city should require the preparation of an EIR rather than a negative declaration, what should the response be?

One court ruled those who challenge the negative declaration must bring before the council substantial credible evidence of the environmental impacts of a particular project. *Richard Perley v. The County of Calaveras*, 137 Cal. App. 3d 424 (1982). Most California courts have since moved to the less-deferential standard set forth in *Friends of B Street v. City of Hayward*, 106 Cal. App. 3d 988 (1980).

This standard requires an EIR where there is substantial evidence in the record that significant adverse environmental effects would, or even could, occur. The EIR is required even if the city has other evidence that the effects will not occur.

CEQA has a clear preference for public participation and dissemination of information. If the evidence presented at a planning commission or city council meeting is credible and substantial in favor of preparation of an EIR, the safest course is to require an EIR. Such an approach minimizes the delays and expense associated with litigation over whether an EIR should have been prepared.

Mr. Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
Re: Mitigated Negative Declaration Issued September 23, 2004
October 16, 2004
Page 13

1. League of California Cities, The Planning Commissioner's Handbook, p 68
2. <http://www.faa.gov/arp/publications/reports/index.cfm>
3. <http://www.faa.gov/arp/app600/49CFR24/landacq.htm>
4. Burbank-Glendale-Pasadena Hypothetical Airport Capacity Analysis — Runway, Gates, Noise, based on 1991 FAA Capacity Study at Burbank Airport
5. Focus, Environmental Health Perspectives Volume 105, Number 12, December 1997
6. Traffic-related Air Pollution near Busy Roads, The East Bay Children's Respiratory Health Study published June 7, 2004
7. National Institute of Health, New Research Shows Air Pollution Can Reduce Children's Lung Function, dated September 8, 2004

Capacity Needs in the National Airspace System
An Analysis of Airport and Metropolitan Area
Demand and Operational Capacity in the Future



June 2004

This Report can be found on the FAA Web Site: <http://www.faa.gov/arp/publications/reports/index.cfm>



June 2004

You are about to read a study that takes a new approach to assessing our country's future needs for airport capacity. This study looks at population trends, economic and societal shifts, and the changing dynamics of the airline industry. It compares that data with planned infrastructure improvements at our airports and projects where future capacity constraints will occur.

The time is right to do this. The aviation industry is going through a difficult period. The blows that hit the U.S. economy so hard after 9-11 landed squarely on the back of the aviation industry. But more passengers are returning to the air. Nine of our 35 major airports are operating above 9-11 levels. And by the end of 2004, we expect a return to pre-9-11 operating levels at 15 major airports, including seven of the top ten.

So, what does the future hold? The changes are clear and profound. Starting before 9-11, and accelerating since then, business travelers are revisiting their travel needs and choices. Demand for low-fare service is strong and growing stronger. The internet has led to price transparency that today allows consumers to "shop around" and compare prices for competing carriers in minutes. Fractional ownership is also offering business travelers new options. And smaller aircraft are promising travelers greater schedule and destination choices.

Our data indicate that many existing airports will need to be expanded to meet future demand, and in a few instances, new airports will need to be pursued to meet growth challenges. The metropolitan areas that have traditionally driven aviation demand will continue to do so, but new metropolitan areas in the South and Southwest are emerging as needing critical capacity as well. And unfortunately, we have metropolitan areas on both coasts where demand will outstrip capacity without adequate solutions in sight.

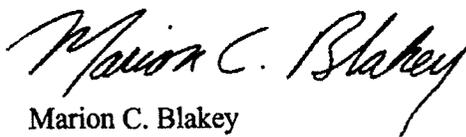
The Government's most significant and challenging role in this dynamic environment is to examine where the requirements are and to work for the development of the infrastructure and capacity to accommodate whatever level and type of demand the market may bring. Since the summer of 2000, when congestion choked the system, airport owners have poured a lot of concrete,

added new runways, and made solid progress in expanding this Nation's physical infrastructure. Our program of strategic investments under the Operational Evolution Plan (OEP) is intended to keep pace with demand over the next decade. The OEP is a 10-year plan to increase the capacity and efficiency of the National Airspace System. It focuses on infrastructure -- primarily new runways -- and technological and procedural initiatives at the top 35 airports.

The Department of Transportation, under the leadership of Secretary Mineta, wants to ensure that the long-term capacity of the aviation system matches forecasts of demand. This study asks:

- Which of the 35 OEP airports will be able to meet future demand and which will not and why?
- Besides the 35 OEP airports, will there be other geographic areas of the country unable to accommodate demand for air transportation?

Our study looks further into the future and takes a different approach than we have before by comparing demand and capacity levels not only at airports, but in metropolitan areas as well to determine where future capacity constraints may emerge. This will underscore the importance of continuing the investment plans now in place in order to be ready for future airport capacity demands. We do this with the conviction that if we provide accurate data and credible forecasts, communities around the country will step up to the plate. They need to help make sure they have a dynamic place in our aviation system -- one that provides such vital support for our Nation's economy and social fabric.



Marion C. Blakey
Administrator

CONTENTS

EXECUTIVE SUMMARY	I
PURPOSE	I
<i>Overview of Methodology</i>	<i>I</i>
Top 35 airports.....	II
Other airports.....	III
Socio-economic demand modeling.....	III
Capacity modeling.....	III
<i>Findings in Brief</i>	<i>IV</i>
General.....	IV
Capacity needs in 2003.....	IV
Capacity needs in 2013.....	V
Capacity needs in 2020.....	VI
<i>Other Airports with Capacity or Delay Constraints that Warrant Further Action</i>	<i>VIII</i>
<i>A System in Transition</i>	<i>IX</i>
<i>Conclusions</i>	<i>IX</i>
CAPACITY NEEDS IN THE NATIONAL AIRSPACE SYSTEM REPORT	1
PURPOSE	1
<i>Coordination With Affected Airports</i>	<i>3</i>
<i>Findings of the Study</i>	<i>3</i>
Capacity Needs in 2003.....	4
Capacity Needs in 2013.....	5
Capacity Needs in 2020.....	8
<i>A System in Transition</i>	<i>12</i>
<i>Scope and Methodology</i>	<i>12</i>
Top 35 airports.....	13
Other airports.....	14
Socio-economic demand modeling.....	14
Capacity modeling.....	15
<i>Conclusions</i>	<i>15</i>
APPENDIX A: LOCATION IDENTIFIERS	17
APPENDIX B: METROPOLITAN AREAS AND ASSOCIATED AIRPORTS	19
APPENDIX C: SCOPE AND METHODOLOGY	21
MODELING CURRENT AND FUTURE AIRPORT CAPACITY	21
<i>Modeling Current Capacity</i>	<i>21</i>
Modeling Future Capacity.....	22
Incorporating Operational Constraints.....	23
MODELING FUTURE AIRPORT DEMAND	24
PROCESS OF IDENTIFYING AIRPORTS NEEDING ADDITIONAL CAPACITY	26
<i>Estimating Future Performance</i>	<i>26</i>

SELECTION CRITERIA FOR IDENTIFYING CAPACITY CONSTRAINED AIRPORTS.....	28
Top 35 airports.....	28
Other Airports	29
PROCESS OF IDENTIFYING METROPOLITAN AREAS NEEDING ADDITIONAL CAPACITY	29
<i>Estimating Future Performance.....</i>	<i>29</i>
<i>Selection Criteria for Identifying Capacity Constrained Metropolitan Areas</i>	<i>30</i>
APPENDIX D: THE EFFECT OF THE SENSITIVITY ANALYSIS USING THE FY 2003	
TERMINAL AREA FORECAST.....	31
<i>Preliminary Evaluation of Changes to the 2013 Results.....</i>	<i>34</i>
Summary of Potential Changes to 2013 Results.....	35
<i>Preliminary Evaluation of Changes to the 2020 Results.....</i>	<i>36</i>
Summary of Potential Changes to 2020 Results.....	37

LIST OF FIGURES AND TABLES

Figure 1. Airports and Metro Areas that Need Additional Capacity in 2003	5
Figure 2. Airport and Metro Areas that Need Additional Capacity in 2013 (After Assumed Improvements)	6
Figure 3. Airports that Need Additional Capacity in 2013 (If Planned Improvements Do Not Occur).....	8
Figure 4. Airport and Metro Areas that Need Additional Capacity in 2020 (After Assumed Improvements)	9
Figure 5. Airports that Need Additional Capacity in 2020 (If Planned Improvements Do Not Occur).....	11
Table D-1. Summary of Forecast Differences: 2002 TAF and 2003 TAF	32
Figure D-2. 2013: Potential Change in Analysis Results Using 2003 TAF (If Planned Improvements Do Not Occur).....	35
Table D-2. Summary of Potential Changes to 2013 Results.....	35
Figure D-3. 2020: Potential Change in Analysis Results Using 2003 TAF (After Assumed Improvements)	36
Figure D-4. 2020: Potential Change in Analysis Results Using 2003 TAF (If Planned Improvements Do Not Occur).....	37
Table D-3. Summary of Potential Changes to 2020 Results.....	37

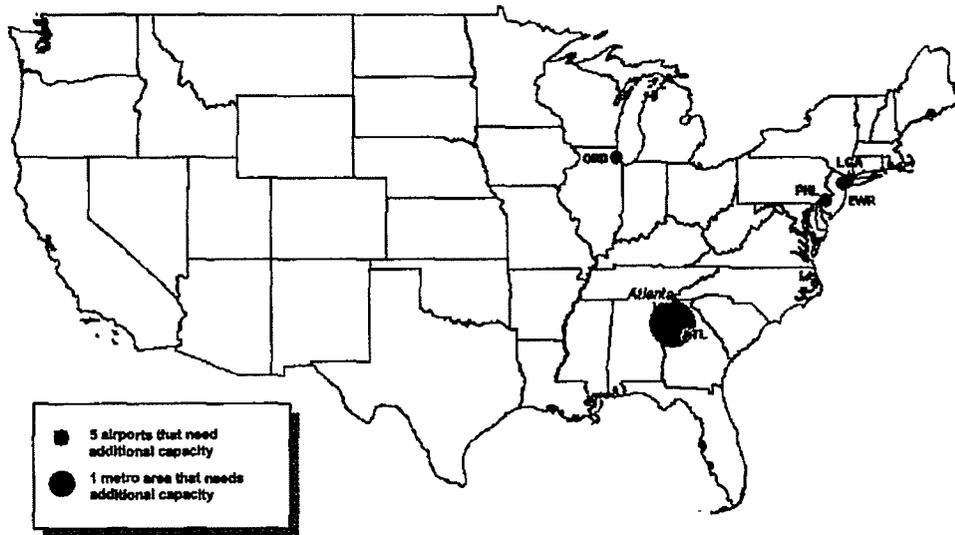


Figure ES - 1. Airports and Metro Areas that Need Additional Capacity in 2003

Capacity needs in 2013

Future capacity for 2013 was based on planned improvements contained in the OEP version 5.0. Even assuming those improvements, 15 airports are identified as needing additional capacity (see Figure ES-2):

- Metropolitan Oakland International (OAK)
- Bob Hope (Burbank, CA) (BUR)
- Long Beach (LGB)
- John Wayne-Orange County (SNA)
- Tucson International (TUS)
- Albuquerque International Sunport (ABQ)
- San Antonio International (SAT)
- Houston Hobby (HOU)
- Chicago O'Hare International (ORD)¹
- New York LaGuardia (LGA)
- New York Kennedy International (JFK)

¹ Note that OEP v.5.0 did not include the O'Hare Modernization Plan (OMP), which will reconfigure the runways at ORD for additional capacity. However, the effects of the OMP are included in the 2020 analysis.

- Newark Liberty International (EWR)
- Philadelphia International (PHL)
- Palm Beach International (PBI)
- Fort Lauderdale-Hollywood International (FLL).

Seven metropolitan areas are also identified as needing additional capacity by 2013: San Francisco Bay, Los Angeles Basin, Tucson, Austin-San Antonio, Chicago, New York Metro, and South Florida.

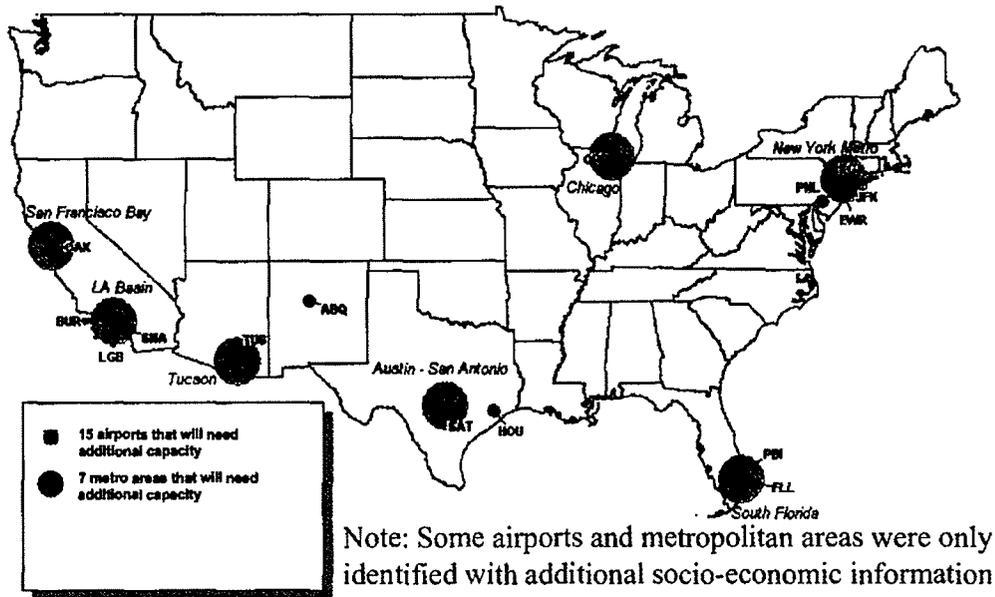


Figure ES - 2. Airport and Metro Areas that Need Additional Capacity in 2013 (After Assumed Improvements)

Most of these airports and metropolitan areas are located in the southern part of the country where shifts in population and the industrial base are occurring. Furthermore, if the improvements proposed in the OEP do not take place, the number of airports with capacity problems in 2013 jumps from 15 to 26.

Capacity needs in 2020

For the year 2020, future capacity was based on assumed improvements in technology and procedures, as well as the implementation of runway construction projects not listed in the OEP. Even with those assumed improvements, 18 airports are identified as likely needing additional capacity (see Figure ES-3):

- Metropolitan Oakland International (OAK)
- Bob Hope (Burbank, CA) (BUR)

National Links

- Airports Headquarters
- Airports Regions
- Airports Resources
- Part 139 Certification
- Compliance
- Design, Engineering, & Construction
- Environmental
- Financial/Grants
- Planning
- Publications & Forms
- Safety

Airport Land Acquisition



Readers



Overview

[Airports](#) > [Airport Land Acquisition](#) > Overview of Airport Land Acquisition

The FAA advisory circular [Land Acquisition and Relocation Assistance for Airport Improvement Program Assisted Projects \(AC 150/5100-17\)](#) provides procedural guidance to airport sponsors to help them carry out their acquisition and relocation programs in conformance to the Uniform Act and the implementing regulations (49 CFR part 24). The Uniform Act prescribes procedures to ensure fair and consistent acquisition of real property for Federal programs and provides additional benefits and entitlements for persons who are displaced due to the acquisition of their owned or leased occupied property for an AIP-assisted project.

The following information generally describes the principle tasks and functions that comprise a land acquisition project. The above-mentioned AC provides detailed information and guidance on the regulatory requirements that pertain to each phase of a land acquisition project.

(See also the [Land Project Checklist](#), which provides a typical description of the required tasks for an uncomplicated sponsor land project submitted for FAA AIP grant reimbursement.)

PROJECT PREREQUISITES (AC 150/5100-17, CHAPTER 1)

Airports included in the [National Plan of Integrated Airport Systems \(NPIAS\)](#) are eligible to receive AIP grant funding. Specific projects at these airport become eligible for grant funding once they are included in the current [FAA Airport Capital Improvement Plan \(ACIP\)](#). The sponsor may consult the FAA project manager to confirm the planning status of a proposed project.

Conformance with the National Environmental Policy Act

As applicable, a proposed project must be evaluated for National Environmental Policy Act (NEPA) conformance before any work for which Federal funding is anticipated begins. Documentation can range from a minor statement of compliance and conformance to a full environmental impact statement (EIS). The sponsor should consult the FAA project manager if there is any question about completion of the environmental assessments. A land acquisition project for noise compatibility must be included as an FAA-approved measure of the airport's [part 150 noise compatibility program](#).

Real Property Rights

On AIP-assisted projects, the sponsor must acquire real property rights of a nature and extent adequate for the construction, operation, and maintenance of the grant-assisted project. The sponsor should consult the FAA project manager to ensure adequate interest is acquired.

Exhibit "A" Property Map

The grant agreement with the FAA requires the airport sponsor to prepare and maintain a current Exhibit "A" property map of airport owned land. The Exhibit "A" indicates land acquired for noise mitigation purposes and redeveloped to airport use and/or aviation use as well as land not retained for airport use. Through the grant application and approval process, the FAA project manager will provide assistance and specific requirements for the development of Exhibit "A".

APPRAISAL (AC 150/5100-17, CHAPTER 2)

The sponsor must appraise the fair market value of the real property to be acquired before the initiation of negotiations with an owner. The property owner shall be given the opportunity to accompany the appraiser on the inspection of the property.

Appraiser Selection

The sponsor must establish qualification criteria that at a minimum ensure that the appraiser's

Burbank-Glendale-Pasadena Hypothetical Airport Capacity Analysis Runway Gates Noise

Note: This analysis is for hypothetical discussion purposes only and should not be construed in any way to represent the opinion or desire of the Burbank-Glendale-Pasadena Airport Authority or any of its authorized consultants regarding the future operation, intended or otherwise, of the airport.



Hypothetical Runway Capacity

Maximum runway capacity is 55 Operations per hour based on a 1991 FAA Capacity Study at Burbank Airport (Source: Sherry Avery Burbank Tower Manager)

55 operations x 24 hours = 1320 total operations per day of all aircraft types
EIR/EIS assumes that in the year 2010 there will be 893 arrivals and departures of all aircraft types per day based on a 24 hour day.

The 7:00 a.m. to 10:00 p.m. non-curfew period is 15 hours long. Assume that all operations occur during this non-curfew time frame:

15 hours x 55 operations = 825 operations

2/3 of operations are GA: $2/3 \times 825 = 550$ ops / 2 = 275 flights

1/3 of operations are Air Carrier: $1/3 \times 825 = 275$ ops / 2 = 138 flights

Currently there are 89 scheduled Air Carrier flights

Note: This analysis is for hypothetical discussion purposes only and should not be construed in any way to represent the opinion or desire of the Burbank-Glendale-Pasadena Airport Authority or any of its authorized consultants regarding the future operation, intended or otherwise, of the airport.

Hypothetical Gate Capacity

Assumptions:

7:00 a.m. to 10 p.m. = 15 Hours with a 45 minute turn around per gate(.75 hour)
737-300 aircraft seats 135 passengers with a 70% load factor = 95 pax/plane
14 gates

Alternative 1: Assume 45 minute turn around

14 gates x 15 hours per day / .75 hour = 280 flights per day
280 flights x 95 pax x 2 operations x 365 days = 19.4 MAP (3547 pax/hour)

Alternative 2: Assume 1.5 hour turn around

14 gates x 15 hours per day/1.5 hour = 140 flights per day
140 flights x 95 pax x 2 operations x 365 days = 9.7 MAP (1773 pax/hour)

Note: This analysis is for hypothetical discussion purposes only and should not be construed in any way to represent the opinion or desire of the Burbank-Glendale-Pasadena Airport Authority or any of its authorized consultants regarding the future operation, intended or otherwise, of the airport

Burbank-Glendale-Pasadena Airport

Hypothetical Noise Capacity

70 CNEL acre limit by law:

392 acres

70 CNEL acre limit as defined
by Resolution 176:

250 acres

First Quarter 1996 70 CNEL:

40 acres

Substantial capacity in excess of the other limiting factors remains to reach
250 acres

Note: This analysis is for hypothetical discussion purposes only and should not be construed in any way to represent the opinion or desire of the Burbank-Glendale-Pasadena Airport Authority or any of its authorized consultants regarding the future operation, intended or otherwise, of the airport.



FOCUS

Environmental Health Perspectives Volume 105, Number 12, December 1997

[[Citation in PubMed](#)] [[Related Articles](#)]



In regulating aircraft and airports, several compelling interests compete: safety, international commerce, and environmental quality. Of these, safety issues receive perhaps most of the attention, garnering large headlines in the wake of airplane accidents. But the issue of the effect of airports on the environment and human health has heated up in recent years as public interest and citizen groups contest airport expansion on environmental and health grounds, and the airline and airport industries attempt to meet increasingly stringent regulations in these areas.

Airports are known to be major sources of noise, water, and air pollution. They pump carbon dioxide (CO₂), volatile organic compounds (VOCs), and nitrogen oxides (NO_x) into the atmosphere, as well as dump toxic chemicals--used to de-ice airplanes during winter storms--into waterways. But determining the extent of airplanes' contribution to local, national, and international levels of pollution is difficult--cars and airplanes entering and leaving airports produce roughly equivalent quantities of ozone precursors. Auxiliary power units (APUs), little jet engines in the planes' tails that power appliances while the planes are at the gate, and ground support vehicles also produce quantities of pollutants. And competing local and national political forces make airport pollution hard to regulate; much of the air pollution is local, but automobile and airplane emissions are regulated both nationally and internationally.

The growth of air traffic further frustrates mitigation of environmental problems. Air traffic is expected to double nationally by the year 2017 and internationally by 2010, according to the Federal Aviation Administration (FAA). At least 32 of the 50 busiest U.S. airports have plans to expand operations, according to a survey conducted by the Natural Resources Defense Council (NRDC), published in the environmental group's October 1996 report *Flying Off Course: Environmental Impacts of America's Airports*. According to the FAA, 60 of the 100 biggest airports want to at least build or extend runways.

Noise Pollution

Studies suggest that noise may harm health. Those who say they are bothered by local noise levels rate their general health more poorly than those who say they are not bothered by local noise, according to a study of two comparable communities in New York City, one of which is located in a flight pattern. Arline Bronzaft, professor emeritus of psychology at Lehman College in New York City and author of the study to be published in *Environment and*

Behavior, urges caution in drawing conclusions from the study, however, because of its small size (270 subjects).

Noise also may interfere with learning. In a 1975 Environment and Behavior study of children who attended a school situated beside some railroad tracks, Bronzaft found that students who spent the entire six years of elementary school on the side of the school closest to the tracks were a full year behind students who had spent the entire six years on the quieter side facing away from the tracks. After later becoming a consultant to the New York City Transit Authority, Bronzaft was able to get that agency to install a noise abatement system on the tracks. She later retested the children and found that the reading level had become identical on both sides of the building.

In a 1993 review of the effects of noise on children, published in *Children's Environments*, Gary Evans, a professor in the department of design and environmental analysis at Cornell University in Ithaca, New York, found a variety of problems in children exposed to noise compared to children not exposed to noise: blood pressure elevated by 4-8 mmHg, learned helplessness, deficiencies in ability to discriminate words (possibly due to tuning out noise), and possible delays in cognitive development. Evans cautions that "there is a total lack of prospective, longitudinal designs in this research area," as well as a lack of precision in two aspects of procedural conditions during testing: uniformity and quiet.

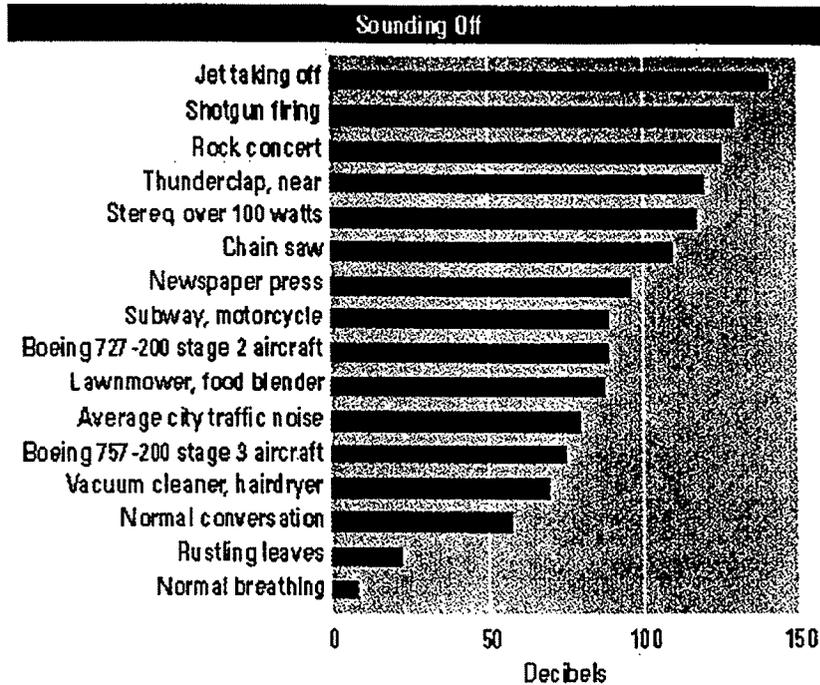
Yet another reported health impact of noise is increased anxiety and levels of annoyance. For example, during the late 1980s, capacity problems forced rerouting of air traffic around New York City and Newark, New Jersey. Routes above areas surrounding those cities had to be layered four-deep in the vertical plane. Planes suddenly began passing 7,000-8,000 feet over the Catskill Mountains on their way into Newark International Airport, about 100 miles south. Major citizen protests ensued. The U.S. General Accounting Office was asked by Congress to examine the situation and concluded in its report that the FAA had failed to account for expectations of quiet among people in rural areas, as well as the lack of urban background noise to mask the planes' drone. Planes continue to fly over Newark neighborhoods as far as 50 miles away from the airport at altitudes of as little as 4,000 feet, blasting residents with up to 78 decibels (dB) from the noisier planes, charges Michael Schatzki, president of the New Jersey Citizens for Environmental Research.

In an independent study on the effects of noise on people, Susan Staples, a psychologist in Stone Ridge, New York, found that factors concerning how people perceive and respond to their environment, such as expectations of noise level, are most predictive of annoyance level. In fact, mere loudness accounts for less than 50% of annoyance from noise, according to a 1993 literature review by R.F.S. Job of the University of Sydney in New South Wales, Australia.

Dealing With Noise

Takeoff from John Wayne Airport in Orange County, California, is like an "E" (for "exciting") ride at Disneyland, says Rick Fishel. Fishel's late father, Robert Fishel, then the noise abatement officer for the Orange County department of transportation and a former fighter pilot, designed the technique. "They put the brakes on, gun the engines, and then release the brakes, so it feels like a dragster," says his son.

The plane climbs like a rocket, says Fishel. It ascends and then starts to fall from the top of its arc, and the passengers feel their stomachs rising. Then the captain cuts the power--and the noise--and the plane essentially glides until it is far enough out over the ocean so that when the captain revs the engines again, the noise is nearly inaudible to the wealthy residents of Orange County.



Source: Environ Health Perspect 102 (11):925 and Flying Off Course: Environmental Impacts of America's Airports. Natural Resources Defense Council, October (1996).

Most airports are not so solicitous of the people who live around their flight paths. But protecting neighbors from noise is largely optional for airports. Airports apply for a grant from the FAA under the "Part 150" program (so named because it is located in Part 14, Section 150 of the Code of Federal Regulations) for money to buy out homeowners or install soundproofing if noise exceeds a threshold of 65 day-night average sound level (DNL). Sound levels are averaged for both night and day, but at night 55 dB counts as 65 to account for the fact that people are sleeping.

To mark the boundary of the threshold, a contour is drawn around the airport, like the contours on a topographic map. Of more than 500 commercial airports in the United States, 231 have participated in Part 150, according to the FAA. Fourteen of the 50 busiest airports are not participating, including LaGuardia Airport, which affects 195,000 people living inside its contour, and Miami International Airport, which affects 163,234, according to the NRDC.

Critics charge that the 65 DNL is based on expediency; that is, what regulators feel can be accomplished without too much expense or difficulty. Complaints of noise abound from people outside of the contour. At the Westchester County Airport in suburban New York City, 95% of complaints fall outside of the 60 DNL contour, according to the NRDC. The group charges that the FAA's use of what the agency calls a "dose" of noise overlooks more subtle factors that determine how much noise annoys. For example, says Carolyn Cunningham, a consultant to the NRDC's airport project, spikes of noise, which can reach 105 dB or more, are far more annoying than a 65-dB drone. Other factors, such as expectation of noise and background noise, she argues, should also be taken into account.

Thomas L. Connor, manager of the technology division in the office of environment and energy at the FAA, asserts that noise dose is the measure that best correlates with annoyance. "Sixty-five DNL represents where approximately 12% of the community would be highly annoyed," he says. Asked whether one might expect that if 12% were highly annoyed, a lot more people would be moderately annoyed, Connor says, "That is something that would be logical to deduce from that." But, he continued, "In terms of government policy . . . this is a level and amount of exposure that government can do something about reasonably and economically." In fact, the FAA has supplemented 65 DNL with other measures, says Connor, such as time spent above the 65-DNL threshold.

Some airports have voluntarily attempted to reduce noise impact. At San Diego International Airport in the past 10 years, the 65-DNL contour has shrunk from about 3 to 1.3 square miles despite increasing traffic, says Danette Lake,

the airport's director of airport noise information.

The airport requires each carrier annually to increase the percentage of the new, quieter "stage 3" aircraft it flies into San Diego--or face fines. Additionally, a curfew on departures favors quieter aircraft with two extra hours of takeoff time. Since 1988, the percentage of stage 3 aircraft flying into San Diego has risen from 49% to 97%. In general, stage 3 aircraft are 10 dB quieter than stage 2 aircraft, which represents a halving of perceived noise, although actual noise reductions vary by aircraft, according to the NRDC report.

The San Diego program and similar noise reduction programs that exist at several other airports can no longer be implemented, however. In 1990, Congress passed the Airport Noise and Capacity Act, which requires that, by the year 2000, all aircraft in commercial fleets weighing more than 75,000 pounds must be either stage 3 aircraft or stage 2 aircraft that have been retrofitted to dampen noise. For a plane flying 4,000 feet overhead, this would reduce the decibel level on the ground from 78 to 72, according to Schatzki's figures. Carriers have spent billions of dollars on this upgrade, says Thomas Bennett, an environmental specialist at the FAA. However, the Airport Noise and Capacity Act has made it virtually impossible to impose curfews or hasten restrictions on stage 2 aircraft because it would require proof that such restrictions do not unduly burden the national aviation system, says Lake. Moreover, the NRDC points out that, although stage 3 aircraft will decrease average noise levels, more planes flying in and out of airports will create more of the loud "single-event" noises (possibly reaching 90-100 dB) that are the most troublesome for airport communities.

The FAA requires airports to file environmental impact statements when they seek federal funds to expand, and such reports may be used in applications for Part 150 grants for noise reduction measures. The environmental statements are "mostly to help the public understand the impact of a proposed action," according to Connor. The FAA is required to consider public comments in response to environmental statements in making decisions, but has never rejected a proposed expansion because of an environmental statement, says Alison Duquette, an FAA spokesperson.

A U.S. Senate bill, the Quiet Communities Act of 1997, would reestablish the office of noise abatement and control in the EPA (which was defunded in the early 1980s), and would "challenge the FAA to listen to the EPA and seriously consider the environmental impact of noise," said Senator Robert Torricelli (D-New Jersey) in introducing the bill earlier this year. The bill recently gained the backing of Senator Daniel Patrick Moynihan (D-New York), greatly increasing its chances of passage. Anti-noise legislation in the New Jersey state legislature, aimed at air traffic, has widespread support throughout the state.

Air Pollution

In 1993, aircraft emitted 350 million pounds of VOCs and NO_x during landing and takeoff cycles, more than double 1970 levels, according to the NRDC report. These two classes of compounds are precursors of ground-level ozone, which can interfere with lung function. "During the summer . . . between 10% and 20% of all East Coast hospital admissions for respiratory problems may be ozone-related," says the NRDC report.

Airports are among the greatest sources of local air pollution. A major airport's idling and taxiing planes can emit hundreds of tons of VOCs and NO_x annually. John F. Kennedy International Airport is the second largest source of VOCs in New York City. LaGuardia is among the major sources of NO_x.

The VOCs emitted by airports may comprise a variety of toxic chemicals, according to a 1993 study by the EPA. Chicago's Midway Airport released more benzene and formaldehyde than most Chicago factories. But Jacob Snow, assistant director of aviation for planning and environment at McCarran International Airport in Las Vegas, Nevada, asserts that in the world of ozone precursor emissions, those from airports are of little consequence. "McCarran's VOC emissions [for 1993] were equivalent to those [produced by] the motor vehicles used by less than 9% of the nonattainment basin's households," he says. Similarly, a 1991 study by Argonne National Laboratory, funded by the FAA, concluded that "the impact of airport emissions on the surrounding air quality was not significantly larger than that of the background emissions. This implies that on a per-unit area of ground surface basis, the airport emissions

are roughly comparable to those of the surrounding urban/suburban areas and roadways."

And, in fact, ground access vehicles such as passenger cars and buses just entering and leaving airports often exceed airplanes as the dominant sources of air pollution at airports. Nationally, ground access vehicles emit 56% of VOCs, while aircraft taking off and landing give off only 32.6% (including emissions from APUs), according to the EPA. Ground access vehicles emit 39.3% of NO_x, trailing closely behind emissions by aircraft and APUs of 46.3%.

Ground service equipment is responsible for 10.9% of airport-generated VOCs and 14.3% of NO_x nationally, according to the EPA. National figures for APUs were not available, but in southern California in 1990, APUs gave off less than 1% of hydrocarbons and about 6% of NO_x, according to the California Air Resources Board (CARB).

In 1993, one out of five U.S. citizens lived in a locale where air failed to meet national standards for ozone. Thirty of the nation's 50 busiest airports are located in ozone nonattainment areas, and three of these are located in the dirtiest nonattainment area, the Los Angeles-South Coast basin.



The trouble with taxiing. Critics charge that taxiing airplanes emit hundreds of tons of greenhouse gases, but airport officials say these amounts are negligible compared to those from cars, buses, and other ground access vehicles.

States that include nonattainment areas must develop state implementation plans (SIPs) for cleaning their air. But states have scant leverage to deal directly with airport pollution. States cannot regulate aircraft emissions for the same reason they cannot regulate automobile emissions. "Can you imagine every airport imposing different standards on 737s?" asks Ken Feith, senior scientific advisor in the EPA's office of air and radiation. So what can a SIP do? "If an airport is owned and operated by a state or local political jurisdiction, that jurisdiction has total control over ground equipment," says Feith. "They can impose restrictions as long as they don't interfere with flight operations." For example, that jurisdiction can limit a terminal's number of gates.

One measure that could reduce emissions is single-engine taxiing. Single-engine taxiing saves fuel and reduces emissions substantially. Delta Airlines pilots generally use one engine to taxi, and at the airline's hub in Atlanta, this strategy saved \$5.9 million in fuel costs in 1995 alone, according to the NRDC. But other airlines eschew or minimize the practice. Some airplanes lack the ability to taxi on one engine, says James Ericson, director of the office of environment and energy at the FAA. Furthermore, crews must be properly trained in the technique. Albert Prest, vice president of operations for the Air Transport Association, a trade group, says that the practice can be dangerous in certain circumstances, such as wet weather, because it may encourage the plane to slide or veer to one side.

The Case in California

But with 25-30 year lifetimes for jets, emissions from airplane engines will remain a problem long after the 2010 deadline for SIPs for extremely polluted areas such as Los Angeles to achieve air quality standards. According to projections by the CARB, aircraft NO_x emissions at so-called South Coast (the southern coast of California) airports will have doubled in 2010 over 1990 levels, to 24.8 tons per day or about 13% of 1990 levels. The board expects hydrocarbon emissions to drop somewhat, from 7.0 to 5.4 tons per day.

In contrast, the board expects ground access vehicle NO_x emissions, mostly from automobiles, to drop to 2.4 tons per day, or about one-quarter of 1990 levels. The projected reductions are due to California's stringent automobile air quality standards. But critics say the figures are optimistic because they assume a slower rate of growth than is actually occurring.

Ozone Nonattainment Areas with Top 50 Airports	
Nonattainment Designation	City (and Number of Airports if More than One)
Extreme	Los Angeles (3)
Severe	Baltimore, Chicago (2), Houston (2), New York (3), Philadelphia, Sacramento
Serious	Atlanta, Boston, San Diego, Washington, DC (2)
Moderate	Cincinnati, Cleveland, Dallas (2), Nashville, Phoenix, Pittsburgh, Salt Lake City, St. Louis
Marginal	Portland, Seattle, Tampa

Source: Flying Off Course: Environmental Impacts of America's Airports. Natural Resources Defense Council, October (1993). Original source: Ozone and Carbon Monoxide Air Quality Data Update Fact Sheet, EPA, Technology Transfer Network.

California's efforts illustrate the difficulties of cleaning air as population and travel explode. The California SIP incorporates a 50% increase in air traffic in the South Coast region, says Henry Hogo, planning manager for the South Coast air quality management district. "We try to balance economic needs with health," he says. "We want to allow growth and see if we can come up with ways of reducing emissions."

Nonetheless, in 1994 the state asked for the federal government's help to curtail reductions in federally regulated interstate transportation sources such as trucks and airplanes, says Hogo. A consultative process was set up between the South Coast district, the CARB, and the EPA to figure out how to achieve the necessary reductions. "The state assigned to the EPA the responsibility to reduce emissions from aircraft engines by a total of 8 tons per day through new standards," says Doris Lo, an environmental engineer in the EPA's Region IX. But a 16% reduction in emissions, recently proposed by the International Civil Aviation Organization, would not come close to delivering the required reduction. The proposed reduction is being opposed by two U.S. engine manufacturers--Pratt & Whitney and General Electric--as well as by the FAA, and is unlikely to be implemented.

The EPA is looking elsewhere for the 8 tons. The easiest emissions reductions could be had by powering ground service equipment with electricity and alternative fuels, and having aircraft at the gate plug into the terminal "instead of running those dirty [auxiliary] engines," says Lo. Nonetheless, these two sources represent a small percentage of VOCs and NO_x, and, so far, less than a ton per day of possible reductions has been identified.

Politics have stifled the South Coast district's own efforts to manage local air quality planning, critics charge. "The state legislature has taken away some of our authority in this area," admits Hogo. In 1994 the district had considered reducing passenger car traffic into airports. At the same time, it had proposed requiring owners of sporting event centers and shopping centers to develop plans to reduce vehicle trips into their locations, says Hogo. A cross-section of business interests pressured the state legislature to block the latter proposal; the legislative stone killed both birds.

Gary Honcoop, manager of the office of air quality and transportation planning at the CARB, refuses to discuss what other approaches to cleaning airport emissions might be explored, saying, "There is a lot of sensitivity because of the airlines involved and some of their concerns. I would hesitate to stir that process up by identifying too much specificity at this point."

NASA, however, is developing new engines that could reduce NO_x by 70% by the middle of the next decade. "We have a pretty good indication that [these levels] can be achieved," says Richard Niedzwiecki, a senior engineer in aeronautics for combustion and emissions research at NASA's Lewis Research Center in Cleveland, Ohio. Such engines could be in commercial aircraft as early as 2008.

Nonetheless, global warming will complicate further efforts to bring down emissions, says Niedzwiecki. To save on CO₂ emissions, he explains, aircraft weight must be reduced. But reducing NO_x requires engines with larger combustion zones. Furthermore, higher operating temperatures reduce CO₂ emissions, but raise NO_x emissions.

"There is now talk of seeking much more substantial CO₂ reductions, and we are putting a program together," says

Niedzwiecki. He is "cautiously optimistic" that both CO₂ and NO_x goals can be met, but the time frame for doing so, he says, is 2010-2050.

Water Pollution

More than 4 million gallons of glycols were used for aircraft de-icing at 93 airports during 1989-1991, according to a survey by the FAA. Glycols are the most voluminous water pollutants from airports. As there are over 500 certified airports in the United States, the actual amount emitted may be much higher.

During de-icing, the airlines mix 55% glycol and 45% water, heat the mixture to about 185° F, and spray the planes down with it, says Miles Carter, manager of environmental services at Denver International Airport. Without recapture efforts, 50-80% of the glycols may end up in the local waterways, says Mark Williams, assistant environmental program manager for the Maryland Aviation Administration. Forty-five of the 50 busiest airports in the United States are within 3 miles of a major waterway, according to the NRDC report. Other chemicals besides glycols that are used at airports may get into waterways, but information about these is sketchy. At Kennedy Airport, there are two underground lakes of jet fuel, estimated to contain 3-5 million and 6-9 million gallons, respectively, according to the NRDC report. The New York State Department of Environmental Conservation has ordered the airport to remove the fuel.



Environmental meltdown? Glycols and other chemicals used to de-ice planes during storms can be toxic to animals and humans.

But glycols receive the most attention. Ethylene glycol is both more effective and more toxic than propylene glycol. The lethal dose for humans of ethylene glycol is a little over three ounces, according to a report prepared for the EPA. Less can damage kidneys. Propylene glycol is relatively innocuous. However, both ethylene glycol and propylene glycol consume high levels of oxygen during decomposition, according to the Airports Council International, a trade group in Washington, DC. This can deplete waterways of oxygen and kill fish.

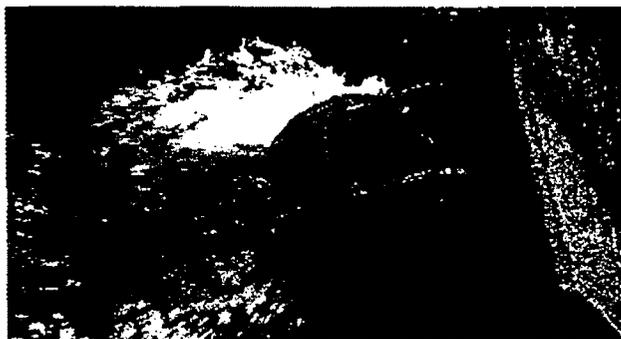
The NRDC complains that regulations for disposal of de-icing chemicals lack teeth. The stormwater pollution prevention plans (SWPPPs) required of states under the Clean Water Act should greatly reduce contaminated stormwater discharges from airports if implemented as required, according to the NRDC report. But, the report continues, "It is not clear when, or if, the plans will be inspected by a regulatory agency." In addition, "SWPPPs must be made available only to regulatory agencies, not the public," which impedes the ability of citizen groups to ensure proper implementation. Says Bennett, "I find that impossible to believe, but compliance is up to . . . the states."

Furthermore, only those airports using an annual average of 100,000 gallons or more of de-icing fluid will be required

to monitor or sample, according to the NRDC. These represent either 4 or 10% of airports nationwide, according to figures by the American Association of Airport Executives and the FAA, respectively. Bennett defends the air transportation providers, saying that the NRDC has provided no evidence that airports are not meeting established regulatory standards. He adds that, although these constituencies have the right to participate in development of regulatory standards, they have no authority to make a final determination of what those standards are.

A small number of airports are very successfully recapturing glycols following use. According to the Airports Council International, 14 of 48 airports surveyed had containment systems for recapturing used glycols. Six airports prepared them to be recycled for other uses.

At Maryland's Baltimore/Washington International Airport, an estimated 25% of glycols are collected following de-icing. That doesn't mean that 75% find their way into the waters. Some of that amount evaporates or goes into the ground, where it decomposes in about 4-20 days, says Williams. The FAA is developing a new model to try to determine how much glycol actually gets into the water.



Watching the water . Stormwater pollution prevention plans could greatly reduce the amount of glycol-contaminated water discharged from airports.

Baltimore/Washington uses two de-icing pads near the end of the runways to retrieve the glycols. The pads, big parking areas, are sloped to shunt de-icing fluids from beneath the plane, along with any precipitation that lands there, down one drain. Stormwater collected elsewhere goes down another drain. Baltimore/Washington also uses "glycol recovery vehicles," vacuum sweepers that "look sort of like street sweepers, that suck up the glycol and any liquid on the pavement," says Barbara Grey, manager of environmental plans and programs for the Maryland Aviation Administration. The glycol is piped to a huge tank, and then released very slowly over months to the sewage treatment plant.

At the Denver airport, which was designed to optimize collection of glycols, 65-70% of the fluid is recaptured, says Carter. These glycols are concentrated to a relatively high 25% on average, depending on the duration and nature of the precipitation.

Recyclers increase the concentration to as high as 99.5%. "We recycle it for coal companies, some paint manufacturers, and General Motors," says Carter. But in the United States, recycled glycols are never used for de-icing, unlike in Europe. "The American manufacturers of glycol have convinced the U.S. airlines that it is a liability to use recycled glycol, although the same airlines use it in Europe all the time," says Carter.

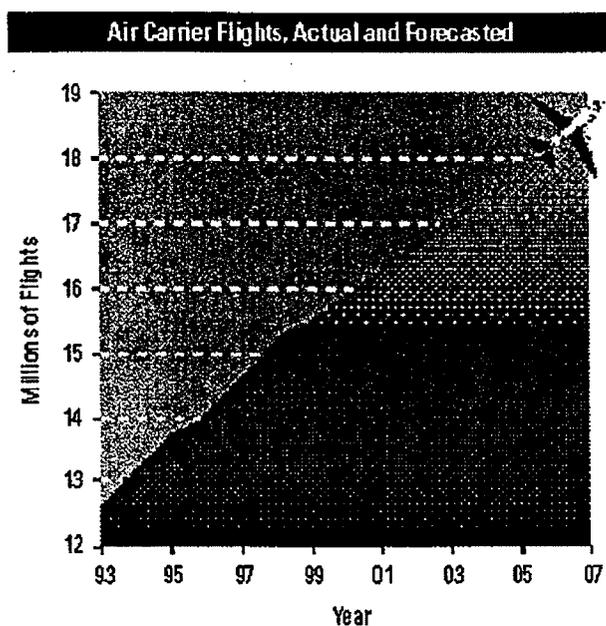
A technological fix that could render de-icing chemicals partially obsolete is the use of infrared rays to heat the exterior of the plane. In such a process, immediately before takeoff the plane would pull into a hangar-like structure outfitted with the infrared energy process units and park there for approximately six minutes while the de-icing takes place.

"I'm really thrilled about it," says Robert Stone, manager of Buffalo Niagara International Airport, where the technology is about to be tested. Capital costs for the process, which are less than \$2 million, are far less than the cost

of systems to recapture de-icing fluids, which can range into the tens of millions. Six planes can be de-iced for \$100-200 worth of gas and electricity, while a single de-icing with glycols can cost \$2,500.

Future Flight

The projected doubling of passenger air traffic within the United States in the next 20 years, as well as the rapid growth of the U.S. population (which every 11 years adds the equivalent population of another California), virtually ensures that the environmental impact of airports will increase unless strong mitigation measures are taken. It is likely that population pressure will lead to greater numbers of people living near airports, even if not within the 65-DNL contour. Even as planes become quieter, increasing numbers will ply the skies, exposing people within the flight pattern to more, if perhaps softer, booms. The 25-30 year lifetime of airplanes will keep large numbers of today's polluting engines aloft long after technological solutions begin to make significantly cleaner engines available. And technological advances in the area of de-icing have been slow coming, potentially allowing toxic chemicals to continue to be released into groundwater. Says Feith, "I think that none of us, even here at EPA, have given substantial thought as to what are potential solutions to the problem of airport pollution."



Source: Flying off Course: Environmental Impacts of America's Airports. Natural Resources Defense Council, October (1996). Original source: FAA Aviation Forecasts: Fiscal Years 1996-2007, Office of Policy and Plans, Table 33, March (1996)

David Holzman

[[Table of Contents](#)] [[Citation in PubMed](#)] [[Related Articles](#)] [[NIEHS Q&A Home Page](#)] [[Previous Page](#)]

Last Update: December 12, 1997

Published ahead of print on June 7, 2004, doi:10.1164/rccm.200403-281OC

American Journal of Respiratory and Critical Care Medicine Vol 170. pp. 520-526, (2004)

© 2004 American Thoracic Society

doi: 10.1164/rccm.200403-281OC

Original Article

Traffic-related Air Pollution near Busy Roads

The East Bay Children's Respiratory Health Study

Janice J. Kim, Svetlana Smorodinsky, Michael Lipsett, Brett C. Singer,
Alfred T. Hodgson and Bart Ostro

Office of Environmental Health Hazard Assessment, California Environmental Protection Agency, Oakland; and Atmospheric Sciences Department and Indoor Environment Department, Environmental Energy Technologies Division, Lawrence Berkeley National Laboratory, Berkeley, California

Correspondence and requests for reprints should be addressed to Bart Ostro, Ph.D., Office of Environmental Health Hazard Assessment, 1515 Clay Street, 16th Floor, Oakland, CA 94612. E-mail: bostro@oehha.ca.gov

Recent studies, primarily in Europe, have reported associations between respiratory symptoms and residential proximity to traffic; however, few have measured traffic pollutants or provided information about local air quality. We conducted a school-based, cross-sectional study in the San Francisco Bay Area in 2001. Information on current bronchitis symptoms and asthma, home environment, and demographics was obtained by parental questionnaire (n = 1,109). Concentrations of traffic pollutants (particulate matter, black carbon, total nitrogen oxides [NO_x], and nitrogen dioxide [NO₂]) were measured at 10 school sites during several seasons. Although pollutant concentrations were relatively low, we observed differences in concentrations between schools nearby versus those more distant (or upwind) from major roads. Using a two-stage multiple-logistic regression model, we found associations between respiratory symptoms and traffic-related pollutants. Among those living at their current residence for at least 1 year, the adjusted odds ratio for asthma in relationship to an interquartile difference in NO_x was 1.07 (95% confidence interval, 1.00–1.14). Thus, we found spatial variability in traffic pollutants and associated differences in respiratory symptoms in a region with good air quality. Our findings support the hypothesis that traffic-related pollution is associated with respiratory symptoms in children.

Key Words: air pollution • asthma • bronchitis • epidemiology • vehicle emissions

This Article

- ▶ [Full Text](#)
- ▶ [Full Text \(PDF\)](#)
- ▶ [Online Supplement](#)
- ▶ [All Versions of this Article:](#)
[200403-281OCv1](#)
[170/5/520](#) most recent
- ▶ [Alert me when this article is cited](#)
- ▶ [Alert me if a correction is posted](#)

Services

- ▶ [Similar articles in this journal](#)
- ▶ [Similar articles in PubMed](#)
- ▶ [Alert me to new issues of the journal](#)
- ▶ [Download to citation manager](#)

PubMed

- ▶ [PubMed Citation](#)
- ▶ [Articles by Kim, J. J.](#)
- ▶ [Articles by Ostro, B.](#)



U.S. Department of Health and Human Services

NIH News

National Institutes of Health

National Institute of Environmental Health Sciences (NIEHS)

FOR IMMEDIATE RELEASE
Wednesday, September 8, 2004

CONTACT:
John Peterson
919-541-7860

E-mail this page
 Subscribe

New Research Shows Air Pollution Can Reduce Children's Lung Function

Children who live in polluted communities are five times more likely to have clinically low lung function — less than 80 percent of the lung function expected for their age. New data from the Children's Health Study suggests that pollutants from vehicle emissions and fossil fuels hinder lung development and limit breathing capacity for a lifetime.

The study was funded by the National Institute of Environmental Health Sciences (NIEHS), one of the National Institutes of Health, the California Air Resources Board and the Hastings Foundation. The results of the study, conducted by researchers at the University of Southern California Keck School of Medicine, are published in this week's issue of the *New England Journal of Medicine*.

"This is the longest study ever conducted on air pollution and children's health," said Dr. Kenneth Olden, director of NIEHS. "It shows that current levels of air pollution have adverse effects on lung development in children between the ages of 10 and 18."

Each year, pulmonary function data were collected from 1,759 children as they progressed from 4th grade to 12th grade. The researchers also tracked levels of air pollutants like nitrogen dioxide, acid vapor, elemental carbon, and particulate matter in the 12 Southern California communities where the children lived. The study encompassed some of the most polluted areas in the greater Los Angeles basin, as well as several less-polluted communities outside the Los Angeles area.

Over the eight year period, researchers found that children living in the most polluted communities had significant reductions in their "forced expiratory volume" — the volume of air that can be exhaled after taking a deep breath — as compared to children living in communities with cleaner air.

In healthy people, lungs grow to full capacity during the teenage years, but typically stop growing at age 18. Then, lung capacity gradually declines. Adults begin to lose lung function by 1 percent each year after age 20.

"Lung development in teenagers determines their breathing capacity and health for the rest of their lives," said John Peters, M.D., Hastings Professor of Preventive Medicine at the Keck School of Medicine. "The potential long-term effects of reduced lung function are alarming. It's second only to smoking as a risk factor for mortality. As lung function decreases, the risk of respiratory disease and heart attacks increases."

Deficits in lung function are associated with other short- and long-term effects. "If children or young adults with low lung function were to have a cold, they might have more severe lung symptoms, or wheezing," says W. James Gauderman, Ph.D., associate professor of preventive medicine at the Keck School and lead author on the study. "They may have a longer disease course, while children with

better lung function may weather it much better."

Researchers are unsure how air pollution may retard lung development. Gauderman believes chronic inflammation may play a role, with air pollutants irritating small airways on a daily basis. Scientists also suspect that air pollutants might dampen the growth of alveoli, tiny air sacs in the lungs.

The research team will continue to follow the study participants into their early 20s, when their lungs will be fully mature. They want to find out whether the participants will experience respiratory symptoms, and if those who moved away from a polluted environment will show some improvement in lung function.

This research is part of the larger Children's Health Study, an ongoing study that was started in 1993. The study is the longest ever undertaken on the association between air pollution and children's health.



[Home](#) > [News & Events](#)

[✉ E-mail this page](#)

[Subscribe](#) to receive future NIH news releases.

PHILIP AND CAROLYN BERLIN

1. The commenter cites Public Resources Code §21091(b) for the proposition that a 30-day public review period was required for this Project. A 30-day period is required only “[i]f the proposed negative declaration or mitigated negative declaration is submitted to the State Clearinghouse for review....” This Project does not require submittal of the proposed MND to the State Clearinghouse, and therefore a 20-day public review period is proper. The Los Angeles County Airport Land Use Commission is a county body, not a state body, and therefore that agency’s involvement in the process does not trigger a 30-day review period.
2. The project description on pages 3 through 17 of the Draft MND/IS fully discusses and discloses all facets of the proposed Project that have the potential to result in environmental impacts, including those provisions of the proposed Development Agreement. Many, if not most, of the Development Agreement provisions have no potential to result in physical environmental impacts. Further, CEQA encourages to the maximum extent feasible that CEQA procedures and other procedures run concurrently, rather than successively. (Pub. Res. Code Sec. 21003(a); CEQA Guidelines Sec. 15004(c).) This policy is furthered by negotiation and Project refinement with the benefit of the concurrent environmental analysis as occurred in this case. CEQA requires agencies to prepare environmental documentation as early as possible in the planning process to enable environmental considerations to influence the project features, but late enough to provide meaningful environmental assessment. (CEQA Guidelines Sec. 15004(b).) The main terms of the Development Agreement were made available well before the Draft MND/IS was prepared and circulated in the Term Sheet issued on 22 June 2004; therefore, the core terms were available to the public before release of the Draft MND/IS. The draft Development Agreement was released for public review on 18 October 2004, and that draft substantively incorporates and embodies the terms of the 22 June 2004 term sheet.
3. The Draft MND/IS addressed all reasonably foreseeable future activities associated with the proposed Project in accord with CEQA’s requirements. The comment cites no specific environmental impacts areas that the commenter believes are insufficient and provides no evidence to support a fair argument that significant impacts may result from the proposed Project. Further, although the comment cites certain mandatory findings of significance, the comment provides no evidence that any of these mandatory findings of significance are applicable to the proposed Project. The comment raises no specific environmental impacts and, therefore, does not provide sufficient evidence to warrant a conclusion that an environmental impact report (EIR) is required for the proposed Project.
4. The City of Burbank staff consulted informally with the Authority’s staff and the environmental consultant regarding the preparation of a Draft MND/IS for this proposed

Project. The City of Burbank is a responsible agency due to its role in processing and acting upon various components of the proposed Project, including but not limited to the Development Agreement, the Planned Development applications, and the Public Utility Code Sec. 21661.6 review. As such, the City will consider the environmental documentation in conjunction with its consideration of the overall proposed Project. Further, the Authority has reviewed, and will review prior to final adoption of the MND, the environmental documentation prepared for this proposed Project, including these comments and the responses to these comments.

The proposed Project is not a project of statewide, regional, or areawide significance. Therefore, no consultation with a transportation planning agency is required.

5. Please see the response to comment #2, above. Further, CEQA does not mandate a worst case scenario analysis, but instead requires analysis based on a rule of reason which allows for reasonable projections and assumptions in analyzing impacts.
6. The changes in operations, underpass construction and the realigned Airport entry are each discussed in the Draft MND/IS. Therefore, CEQA analysis of these activities has been undertaken, and has not been deferred as the comment suggests. The project description explains the full scope of the proposed Project, and no portion of the proposed Project has been “chopped off” for its own separate environmental review. The comment provides no example of what future activities have been excluded from the proposed Project because there are no reasonably foreseeable future plans or activities to include for analysis at this time.

The comment asserts that traffic analysis has not been completed for the proposed Project. Pages 51 through 59 of the Draft MND/IS discuss the traffic impacts of the proposed Project and the conclude that the Project would not result in significant traffic impacts. The comment suggests that there are plans for relocation of the terminal building to the B-6 property; however, the Authority has no such plans. In fact, the Development Agreement precludes the Authority from development of a new or relocated terminal facility for a period of ten years, further demonstrating that relocation of the terminal to the B-6 property is not reasonably foreseeable. The unsubstantiated opinion regarding a future terminal does not constitute substantial evidence sufficient to undermine the traffic study completed for the proposed Project. Please also see the responses to comment #9 of the City of Burbank letter and comments #1 and #3 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter.

7. The commenter correctly notes that the proposed Project involves realignment of the roadway and access to the parking facility on the A-1 North Property, including construction of a new underpass. However, each of these activities is explained in the project description and has been analyzed in the document. The commenter asserts that the mitigation identified is insufficient to mitigate impacts, but does not state which of the various mitigation measures are inadequate and provides no evidence regarding

alternate mitigation measures that the commenter may feel are more effective. The commenter suggests that there are plans for relocation of the terminal building to the B-6 property; however, the Authority has no such plans. In a 2002 letter, then President Chris Holden notified the Federal Aviation Administration that the Authority had abandoned its plans to pursue a new terminal (see copy of correspondence beginning on page 94). In addition, the Development Agreement precludes the Authority from development of a new or relocated terminal facility for a period of ten years, further demonstrating that relocation of the terminal to the B-6 property is not reasonably foreseeable. The unsubstantiated opinion regarding future terminal does not constitute substantial evidence sufficient to require an environmental impact report for the proposed Project. Further, sale of all or a portion of the B-6 property may result in other uses, but it would be pure speculation to try and determine what those future uses might be, and CEQA does not require analysis of purely speculative scenarios.

The commenter also suggests that the capacity needs report prepared by the Federal Aviation Administration supports the allegation that an expanded passenger terminal is being planned at the Airport. However, that document shows nothing more than estimates regarding expected demand in the future. Projected demand does not provide evidence of any reasonably foreseeable plan to expand or relocate the existing passenger terminal. Further, the demand may be served in ways other than expanding or relocating the passenger terminal and speculating on what may or may not occur at the Airport in future years is not required by CEQA.

Finally, the commenter alleges that certain economic impacts related to the proposed Project will occur. However, such economic impacts are not physical impacts to the environment nor do they have reasonably foreseeable indirect impacts on the physical environment. There are no significant environmental impacts identified by the commenter and CEQA does not require analysis of social or economic impacts that do not have the potential for impacts to the physical environment.

Please also see the responses to comment #9 of the City of Burbank letter, comments #1 and #3 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter, and comment #6 of this letter.

8. The commenter does not raise any environmental issue. Please see the response to comment #7 of this letter.
9. The proposed Project would not result in the development of a new passenger terminal on the B-6 Property. Therefore, the only change in the use of the runways that would occur under the proposed Project is the change identified in Table 5 on page 43 of the Draft MND/IS. It is important to note that the completion of Taxiway D would not affect the number of aircraft operations at the Airport. This change in runway use would occur as a result of the completion of Taxiway D and is not associated with any development of a new terminal on the B-6 Property.

10. The Uniform Relocation Act specifically exempts voluntary acquisitions and is intended primarily for condemnations. As such, the appraisal requirements of the Act do not apply to either the acquisition of the A-1 North Property or this proposed Project.
11. Please see the response to comment #5 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter.
12. Page 14 of the Draft MND/IS provides details regarding the size of the proposed valet parking plaza and the rental car customer center buildings. However, it is acknowledged in Section B of this document that the Authority has decided not to develop a rental car center on the A-1 North Property. Therefore, the rental car customer center building would not be developed as a result of the proposed Project.

Appendix B of the Draft MND/IS provides a description of how rental car customers and valet parking customers would access the passenger terminal. With the proposed access to the passenger terminal as described in Appendix B, no safety issues for valet parking patrons would occur. With the Authority's decision not to develop a rental car center on the A-1 North Property, rental car customers would access the rental car parking lots as they currently do today. Therefore, no changes in safety associated with rental car customers would occur as a result of the proposed Project.

13. As stated on page 57 of the Draft MND/IS and in Section C of this document, the proposed Project would result in a decrease in the number of vehicles on roadways in the vicinity of the Airport. The specific traffic impacts associated with fast food restaurants on the west side of Hollywood Way south of Thornton Avenue would be the subject of environmental review conducted by the City of Burbank. Because the proposed Project would not result in any increase in the number of vehicles on roadways in the Airport vicinity, the proposed Project would not contribute to any cumulative traffic impacts.
14. The Draft MND/IS acknowledges a provision of the Development Agreement that would restrict the Authority's ability to construct parking facilities in the Southwest Quadrant of the Airport for a four (4) year period. However, at this time, the Authority has no need for and does not plan to construct parking in that area. If at some future time the Authority decides to undertake a parking construction project on the Southwest Quadrant appropriate CEQA documentation would be prepared at that time. Because there are no current plans to construct parking in the Southwest Quadrant, any analysis at this time would be speculative.
15. The City of Burbank's General Plan land use designations and Zoning set forth what types of uses could be developed on the B-6 Trust Property. However, it is too speculative to determine what uses may be proposed or permitted in the future. Further, such future projects would be subject to the applicable CEQA review when actually proposed to the City.
16. The construction of Taxiway D would not cause more aircraft to be in the proximity of Runway 8-26. Runway 8 is already the primary arrival runway as it has the only

instrument approach to the Airport and is used for arrivals by over 68 percent of all aircraft landing at the Airport. Constructing Taxiway D allows ATC to direct some of the aircraft movements to the north, alleviating the congestion on the south parallel taxiway and in the terminal non-movement area. The majority of GA aircraft, which account for more than 40 percent of total operations at the Airport, are taxiing to or from the northwest quadrant of the Airport. This quadrant is where the two GA Fixed Base Operator (FBO) facilities and a number of the cargo facilities are located. On an average day, it was estimated that approximately 53 of 145 aircraft landing on Runway 8 must cross both runways during ground taxi operations. With the construction of Taxiway D it is anticipated that aircraft required to make two runway crossings will be reduced by 70 to 75 percent. Reducing runway crossings and congestion in the terminal area would result in an overall greater level of safety and efficiency at the Airport.

17. Please see the response to comment #2 of the South Coast Air Quality Management District letter.
18. The proposed Project would not result in any changes in the number of aircraft operation at the Airport. Therefore, no changes in air pollutant emissions would occur. In terms of changes in noise as a result of Taxiway D, the FAA Advisory Circular Checklist dated 1 July 2004 lists the current Advisory Circular (AC) concerning VFR Flight Near Noise-Sensitive Areas Advisory as AC No. 91-36C. This AC describes voluntary practices for pilots flying under Visual Flight Rules (VFR) to reduce aircraft noise over noise sensitive areas. The proposed Project in no way limits the ability of pilots of VFR aircraft to follow these voluntary practices to the extent it is safe, practical, and consistent with FAA air traffic control procedures to do so.
19. Table 2 on page 11 of the Draft MND/IS provides details regarding the number and type of parking spaces that would be developed on the A-1 North Property as a result of the proposed Project. The analysis provided in the Draft MND/IS provides a thorough description of the impacts associated with changing the type of parking that occurs on the A-1 North Property.
20. Paragraph 4 on page 14 of the Draft MND/IS indicates that the space currently occupied by the rental car counters within the passenger terminal would be converted to baggage claim facilities, which would have enabled the Authority to provide more space for currently congested baggage claim area in Terminal B. However, with the Authority's decision not to include the development of a rental car center on the A-1 North Property, the rental car counters in Terminal B would not be converted to baggage claim facilities. Therefore, there would be no "successor uses" as a result of the proposed Project and no further analysis is required.
21. Please see the response to comment #13 of this letter.
22. As stated on page 64 of the Draft MND/IS, if contaminated soils are encountered during excavation activities on the A-1 North Property, soils would be disposed only at a facility permitted to take such soil. No impacts related to the hauling of contaminated soil are

anticipated because such activities require permits to occur. These permits are granted to the contractor and include provisions to only use appropriate haul routes. Therefore, no impacts associated with hauling contaminated soils would occur as a result of the proposed Project. For informational purposes, correspondence associated with the closure and clean-up of the A-1 North and the B-6 Properties are presented in Tables 3 and 4, respectively.

23. Please see the response to comment #3 of this letter.

**TABLE 3: SUMMARY OF RWQCB NFR LETTERS
LOCKHEED MARTIN PLANT A-1 (NORTH OF EMPIRE)**

Line No.	Title	Date
1.	No Further Requirements, Feature 21 (Former Compressors), Lockheed Martin Plant A-1 North, Building 71, Area "C"	October 28, 1999
2.	No Further Requirements, Feature 48 (Former Clarifier A-1-S), Building 29, Lockheed Martin Plant A-1 North, Area "B"	April 4, 2000
3.	No Further Requirements (Soil Only), Feature No. 5 (Former Machine Pad), Building 75, Lockheed Martin Plant A-1 North, Area "C"	September 25, 2000
4.	Partial No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North, Area "A"	September 29, 2000
5.	No Further Requirements, Feature No. 10 (Tank A-1-F) (Soil Only), Lockheed Martin Plant A-1 North, Area "A"	October 19, 2000
6.	No Further Requirements, Feature No. 8 (Former Spar Mill Sump) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	February 28, 2001
7.	No Further Requirements, Feature No. 9 (Former Degreaser Pit) (Soil Only), Lockheed Martin Plant A-1 North, Area "A"	March 5, 2001
8.	No Further Requirements, Feature No. 1 (Former Floor Drains) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	March 5, 2001
9.	No Further Requirements, Feature No. 50 (Former Conveyor Trench) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	March 6, 2001
10.	No Further Requirements, Feature No. 34 (Former Boiler Blowdown Sump) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	March 8, 2001
11.	No Further Requirements, Feature No. 49 (Former Containment Pit) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	March 8, 2001
12.	No Further Requirements (Soil Only), Feature No. 34 (Former Sump A-1-Z), Lockheed Martin Plant A-1 North, Area "B"	March 30, 2001
13.	No Further Requirements, Feature No. 19 (Former Spar Mill Sump and San Trap) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	March 30, 2001
14.	No Further Requirements, Feature No. 35 (Former Paint Booth) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	March 30, 2001
15.	No Further Requirements, Feature No. 51 (Former Refrigerator Floor Drain) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	March 30, 2001
16.	No Further Requirements, Feature No. 36 (Former Subsurface Collection Sump), Building 75 (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	April 4, 2001

Line No.	Title	Date
17.	Partial No Further Requirements, Feature No. 15 (Former Sump) (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	April 6, 2001
18.	Partial No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North, Area "A"	June 26, 2001
19.	Partial No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North, Area "B"	June 26, 2001
20.	Partial No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	July 3, 2001
21.	Partial No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North, Area "C"	August 27, 2001
22.	Partial No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North, Area "C" (<i>regarding areas of concern in Area C that were not discussed in previously NFR letters</i>)	August 27, 2001
23.	No Further Requirements (Soil Only), Feature No. 6 (Former Aluminum and Sulfuric Anodizing Process Tank Area), Lockheed Martin Plant A-1 North, Area "B"	August 27, 2001
24.	Partial No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North, Area "B"	August 27, 2001
25.	Partial No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North, Area "B" (<i>regarding areas of concern with Plant A-1 North, Area B that were not discussed in previous NFR letters</i>)	August 27, 2001
26.	Partial Site-Wide No Further Requirements (Soil Only), Lockheed Martin Plant A-1 North	August 30, 2001
27.	No Further Requirements (Soil Only), Feature Nos. 28, 29 and 30 , Lockheed Martin Plant A-1 North, Area "B"	November 20, 2001

**TABLE 4: SUMMARY OF RWQCB NFR LETTERS
LOCKHEED MARTIN PLANT B-6 (WEST OF HOLLYWOOD WAY)**

Line No.	Title	Date
1.	No Further Requirements, Parcels D and F	July 18, 1996
2.	No Further Requirements, Parcel B	August 2, 1996
3.	No Further Requirements, Parcel G	August 2, 1996
4.	No Further Requirements, Parcel C	August 6, 1996
5.	No Further Requirements, Parcel L	August 6, 1996
6.	No Further Requirements, Parcel I	August 6, 1996
7.	No Further Requirements, Parcels B, C, I and L	August 16, 1996
8.	No Further Requirements, Parking Lot Northeast of Building 82	September 23, 1996
9.	No Further Requirements, Area #3, Subsurface Soil Investigation, Building 353 – Dry Wells and Reservoir Sump	October 9, 1996
10.	No Further Requirements, Area #7, Subsurface Soil Investigation, Building 88 – Former Fuel UST	October 10, 1996
11.	No Further Requirements, Area #8, Subsurface Soil Investigation, Building 88 – Former UST F28	October 11, 1996
12.	No Further Requirements, Area #4, Subsurface Soil Investigation, Building 353 – Process Lines	October 15, 1996
13.	No Further Requirements, Area #11, Subsurface Soil Investigation, Building 310 – Former Closed In-Place UST F15	October 24, 1996
14.	No Further Requirements, Area #10, Subsurface Soil Investigation, Building 310 – Former Closed In-Place UST F20	October 28, 1996
15.	No Further Requirements, Area #13, Subsurface Soil Investigation, Building 304- Former UST F25	November 4, 1996
16.	No Further Requirements, Clarifiers B-6-F, B-6-K and B-6-Z	November 5, 1996
17.	No Further Requirements, Former UST F14, Buildign 309	November 19, 1996
18.	No Further Requirements, Area #5, Building 353 – Former TCA Degreaser	November 20, 1996
19.	No Further Requirements, Parcel E	November 22, 1996
20.	No Further Requirements, Area #6, Building 352 – Former Sewage Sump	November 26, 1996
21.	No Further Requirements, Parcel A	December 3, 1996
22.	No Further Requirements, Parcel J	December 4, 1996

AIRPORT COMMISSIONERS

Chris Holden, President
Charles A. Lombardo, Vice President
Carl A. Povilaitis, Secretary
Gerald W. Briggs
Don Brown
John C. Crowley
Carl Meseck
Joyce A. Streator
Bill Wiggins



November 4, 2002

Marion C. Blakey
Administrator
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, D.C. 20591

Dear Administrator Blakey:

On behalf of the Burbank-Glendale-Pasadena Airport Authority, I want to take this opportunity to give you an update on the status of the proposed relocation of the airport's passenger terminal due to that facility's proximity to the runways. As the FAA has noted in the past, certain portions of the terminal building are as close as 300 feet to the centerline of Runway 8/26, and the entire structure is well within the 750-foot Building Restriction Line. Achieving a relocation of the terminal has been a high priority of the FAA, and our two agencies have worked together for several decades to achieve that goal.

In recognition of the importance of the terminal project, former Administrator Garvey came to Burbank in 1998 and conferred at length with local community and political representatives. While voicing strong support for the terminal, Administrator Garvey also emphasized that the FAA had a strong preference for local solutions to aviation facility issues that the FAA could support.

I write you at this time because the Authority has reached the point where it believes the terminal relocation no longer appears to be achievable. As discussed below, the Authority wishes to determine what priority the FAA assigns to terminal relocation at Burbank. We also wish to initiate dialogue on how the Airport and the agency can cooperatively develop a course of action that recognizes the lack of consensus that will indefinitely plague this project.

Pending consideration of any comments you might have, our current plan is to issue an announcement soon after the first of the year that the Authority will cease its efforts to pursue terminal relocation at the Burbank Airport.

Marion C. Blakey
November 4, 2002
Page 2

Let me briefly summarize the developments that lead the Authority to its conclusion.

Our most recent attempt to relocate the terminal culminated with the Airport Authority's acquisition in 1999 of 130 acres of Lockheed land immediately adjacent to the airport that was identified in the FAA's Environmental Impact Statement as the preferred site for the terminal. The FAA certified the EIS in 1996 and awarded a total of \$42 million in grants toward the purchase price for the property. The permission to use that property lies entirely within the purview of the City of Burbank, under provisions of the California Public Utilities Code that require approval of a host city before an airport may acquire land.

The Authority's attempts to overturn these restrictive provisions in California state court were unsuccessful, and in November 1999, the Authority and the City of Burbank entered into an agreement to place the property in a trust, pending receipt of City approval for the land acquisition. To date, the approval of the land acquisition and the terminal project have remained beyond our reach due to community concerns. These concerns have given rise to demands for day and nighttime restrictions on aircraft operations as well as financial contributions designed to mitigate potential adverse impacts from future airport operations.

Developments over the past three years have continually diminished the prospects of reaching local consensus that will permit the terminal project to move forward. The Authority and the City came very close to an agreement in 1999, proposing an approach that would avoid the formality of an aircraft curfew, and the requirement for an attendant Part 161 Study, by closing the passenger terminal at night between 11 p.m. and 6 a.m. However, the FAA's chief counsel opined that this, too, would require a Part 161 Study, and a final agreement was never reached.

Since that time, the ability to develop and achieve feasible local solutions has been constrained by two votes of Burbank citizens. Measure B, passed in 2000, requires that the voters of Burbank approve any airport land acquisition and any agreement for a new terminal between the City and the Authority before it becomes binding. Measure A, passed in 2001, imposed numerous other preconditions, including a curfew, and passenger and flight limitations, before a project was permitted. Measure A was subsequently overturned in court, but the sentiment of the voters who supported it remains. Most recently, the City Council appointed an advisory committee to study airport issues in hopes of identifying conditions helpful to the Council in its deliberations on the terminal relocation issue. The committee's report, released in October, recommended anew that daytime and nighttime operating limitations be imposed on the Airport before any replacement terminal is allowed.

Marion C. Blakey
November 4, 2002
Page 3

A key point raised in the community, and reiterated in the fall advisory committee report, is that the safety considerations that have motivated the FAA and the Authority to seek the terminal relocation are desirable, but not compelling. In short, they do not outweigh the future noise impacts of more aircraft flights that are perceived as being induced by a replacement terminal. This perspective has been bolstered by court testimony and public statements by FAA representatives that the current terminal is safe and that its relocation is merely intended to enhance safety.

There is now a lengthy litany of factors – a state law requiring City approval for land acquisition; voter sentiment opposing the project unless daytime and nighttime flight restrictions are approved; a voter approval requirement for the terminal relocation project; and a requirement for a new EIR – which, when coupled with the questionable economic status of the airlines, place difficult and perhaps insurmountable obstacles in the path of a terminal relocation at Burbank.

This situation has led the Authority to conclude that a local consensus on the terminal relocation project is unachievable. At the local level, the issue remains deadlocked in numerous conflicts that hold no promise of resolution. The Authority has had to acknowledge that it has no ability to effectuate resolution. It is also not clear at this point whether the Federal Aviation Administration can or wishes to do so either. In the absence of a more compelling rationale or safety directive from the FAA than the agency has been able to offer previously, it appears that the prospect for consensus is extremely remote. It may well be that the only alternative open to the Authority is to permanently remain in the current terminal building.

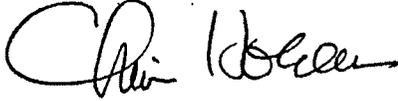
My purpose with this letter is to advise you of this assessment by the Authority and to seek agency input at this juncture. Clearly, the Authority has been reluctant to contemplate this turn of events. However, soon after the first of the year the Authority will have to consider whether to announce publicly that it will not and cannot actively pursue a replacement terminal project unless there is impetus from others. The FAA's position on this impasse would significantly affect the Authority's determination of the appropriate course of action.

Our dilemma is not only that we have failed to reach consensus thus far, but that keeping the façade of a possible project, when there is no sense that agreement is achievable, is more than counterproductive; it is disruptive to the Authority, the local community, and to local community leaders whose longstanding efforts to achieve safety improvements have been met with strident opposition. Debate over this project tears at the fabric of this community.

Marion C. Blakey
November 4, 2002
Page 4

We would look forward to the agency's perspective on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Holden". The signature is written in a cursive style with a large initial "C".

Chris Holden
President

cc: Woodie Woodward
Kate Lang
Herman Bliss

RECEIVED

OCT 18 2004

ADMINISTRATION

QUESTIONS & COMMENTS

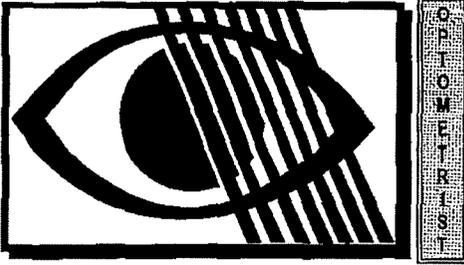
**NOTICE OF INTENT TO ADOPT A
MITIGATED
NEGATIVE DECLARATION**

RELATING TO BOB HOPE AIRPORT
DEVELOPMENT AGREEMENT
AND RELATED ACTIONS
INITIAL STUDY

FROM: DAVID W. GORDON

SUBMITTED TO:

DAN FEGER, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, CA 91505



DR. DAVID W. GORDON

851 N. HOLLYWOOD WAY

BURBANK, CA 91505

Tel. (818) 842-2111

Fax (818) 842-4454

Laser Surgery

Co-Management

www.drgordon.com

e-mail: <gorbur@pacbell.net>

» **DESIGNER FRAMES** » **CUSTOM CONTACT LENSES** » **EYE EXAMS**

October 17, 2004

To: Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Building #9, Room 210
Burbank, CA 91505

Re: Comments submitted by David W. Gordon in response to the:

"Notice of Intent to Adopt a Mitigated Negative Declaration" concerning the

"Bob Hope Airport Development Agreement and Related Actions Initial Study"

Dear Airport Authority:

I am directing my comments to you, the "Lead Agency," regarding your intent to adopt a mitigated negative declaration concerning the Bob Hope Airport Development Agreement (BHADA). My comments generally and specifically urge you not to adopt this negative declaration since it is vague, incomplete, and legally deficient. Further, it does not adequately address future potentially significant impacts, specifically required under CEQA, which may be individually limited, but cumulatively considerable. The public is being deprived of its right to be adequately informed and have an opportunity to intelligently comment on the merits of the development agreement by virtue of the obtuse, vague, and entirely myopic "Project Description."

Specific Questions and Comments:

1. The proposed Mitigated Negative Declaration is deficient in not adequately nor comprehensively reviewing the entire proposed project in detail, in all its components, or in all its individual and cumulative environmental impacts. The full details and scope of this proposed project have been deliberately concealed from the public. The nature and likely developmental outcomes of this initial project calls out for a full EIR under the California Environmental Quality Act (CEQA). 1
2. The purpose of an EIR, according to the City of Burbank's Draft Environmental Impact Report for the Burbank Center Plan and South San Fernando Redevelopment Project, March, 1997, p. xxvii, is ***"to analyze the potential environmental impacts associated with development anticipated to occur."*** It goes on to say, ***"The role of the EIR is to provide information to public agencies and the general public regarding the potential short-term and long-term impacts related to the implementation of the proposed (project)."*** The proposed development agreement has not been made available to the public, has not been analyzed, and no long-term impacts have been reviewed, violating CEQA. 2

3. CEQA outlines the thresholds for determining significance of impacts. According to the City of Burbank's 1997 Burbank Center Plan Draft EIR, p.17, sect. 2.1.2, Land use impacts are considered significant if the proposed project would substantially increase the existing or proposed intensity of development of an area..." The impacts of land use and development of this project cannot be intelligently ascertained since the development agreement has not been made public and the full extent of permitted development, plans, and land use that may occur during the term of this project/development agreement and thereafter has not been disclosed . 3
4. The **"Project"** consists of **"several proposed specific project components"** and a **"proposed development agreement."** The proposed development agreement has never been made public. How can the Airport Authority, which **"proposes to execute"** said agreement, expect to fulfill its charge pursuant to CEQA to obtain meaningful public input, for or opposed to said project, if the heart of the project is a phantom development agreement that has not been seen by the public or its elected government officials? 4
5. **"Generally, the development agreement would freeze in place existing City rules and regulations governing development at the Airport in exchange for the Authority's agreement not to pursue certain other development and uses for the term of the development agreement."** Without the public having, or its elected officials acknowledging having, any access to the draft or final development agreement, no meaningful public review or comment can be provided to the Authority regarding potential significant future or cumulative impacts, particularly as to what impacts the pursuit of **"certain other development and uses"** might entail after the term of the development agreement expires. 5
6. There is a blatant inconsistency in the **"Description of the Project"** between the **"four specific projects,"** the details of which span in excess of 50 pages of print, tables, and maps, for which unspecified **"vested rights"** would be granted and the underlying heart of this entire Mitigated Negative Declaration, the development agreement, for which a vague sketch is provided in the course of two to three paragraphs. 6
7. The project encompasses various discretionary approvals that must emanate from the City of Burbank. Among these is **"Rezoning by the City of two parcels from M-2 to Planned Development."** The public is being deprived of its right to provide informed comment to the Lead Agency, as mandated by CEQA, by excluding any general or specific description of said Planned Development and what environmental impacts - current, future, or cumulative, it might entail. 7
8. The project study goes to great length to describe four specific **"components"** but only vaguely describes the guts of the project, that is, the proposed development agreement. The unseen development agreement **"would address the extent to which the Authority can make changes to the Airport for a fixed term of seven years....and limit or prohibit certain other development and uses for the term of the agreement."** By not providing any details of what **"changes"** the Authority will be permitted to make at the airport and not specifying what other **"development and uses"** might or might not be limited or prohibited, the public and its elected government officials are being denied their rights and responsibilities mandated under CEQA for **PUBLIC** information, **PUBLIC** review, and **PUBLIC** comment on potential short-term **AND** long-term significant environmental impacts of this proposed project. 8
9. The public has not had the opportunity to see the proposed development agreement and all development it might permit or restrict and therefore has not been informed of all the potentially significant environmental impacts that may occur individually or cumulatively. 9

10. Regarding traffic and circulation impacts, the negative declaration study limits its review to current levels of service or projected levels of service only under the limited impacts of the four specified project components that have been described, and only for a period of seven years. This project is but a precursor for the eventual, relatively short-term plan to develop new, expanded airport terminal facilities which unquestionably will have significant, long-term individual and cumulative impacts on the surrounding community. 10
11. According to the City of Burbank's Draft Environmental Impact Report for the Burbank Center Plan and South San Fernando Redevelopment Project, March, 1997, p. xv, Traffic, 1. Overall Program Implementation, a "major development project" is defined as "any project greater than 100,000 square feet in floor area, greater than 100 dwelling units, or greater than 100 peak-hour trips inbound and outbound." As a mitigating measure, the City states, "Prior to approval of any major development project the City will have in place a circulation improvements program..." Because the full extent of the proposed project/development agreement has not been disclosed it is impossible for the public or decision makers to fully assess the individual and cumulative impacts of this project. 11
12. According to the Cumulative Traffic volumes and nearby or adjacent projects presented in the study's Environmental Checklist on p. 57, the immediate area of the proposed project will be heavily impacted by traffic. The full environmental significance of the proposed project cannot be intelligently assessed without knowing the contents of the concealed development agreement or what development the specified four component sub-projects will likely portend. The listed projects adding to cumulative traffic include:
A-1 North Zelman Restaurants Project (25,827 square feet)
Media Studios North Office Development (525,155 square feet)
Buena Vista / Empire Residential (310 multi-family units) and Retail (1,000 square feet)
Burbank Empire Center Office Development (500,000 square feet)
Voit Airport Commerce Center "Light Industry" Condominium Park (480,000 square feet)
Trammel Crow Office Development (155,000 square feet)
.The cumulative effect of these projects combined with the partially specified short-term and unspecified long-term impacts of the proposed airport project or "deal" call out for the mitigation outlined by the City (see item 11 above). That is, "Prior to approval of any major development project the City will have in place a circulation improvements program." In particular the cumulative impact of all these projects becomes a "major development project," calling for an EIR. This concentrated cumulative development falls under the City's description of a "major development project" defined as "any project greater than 100,000 square feet in floor area, greater than 100 dwelling units, or greater than 100 peak-hour trips inbound and outbound." 12
13. The project calls for changes to the City's Zoning Ordinance and Building Code that will enable the development of "certain project components." It does not specify how these zoning changes would apply to uncertain project components that are mentioned but not described. Again, this deprives the public of its rights under CEQA to be informed of a project's potential environmental impacts and afforded an opportunity to review and submit informed comments upon it to the Lead Agency. 13
- .
- .
- .
- .
- .
- .

14. The project proposes the addition of a new taxiway referred to as Taxiway D. There are two impacts of Taxiway D that may adversely impact the environment. Appendix A summarizes the findings regarding Taxiway D by indicating it will **"Have no effect on overall airport capacity."** This conclusion may be valid if the Airport maintains its current described utilization protocol of the proposed Taxiway D for redirecting certain large sized cargo planes. However, nothing thus far disclosed in the project/development agreement would prevent the Airport by modifying said use of Taxiway D to permit stacking of idling aircraft of all varieties. Such stacking would increase the operating capacity of the airport. It would potentially add significant noise and polluting emissions impacts. And, there would likely be increased safety risks should a new terminal building be constructed on the former B-2 site causing arriving and departing planes to have to cross Taxiway D to reach the anticipated new terminal or the departing runway. 14
15. Appendix A, p. A-10, Operational Capacity, potentially contradicts the statement that Taxiway D will have no effect on overall airport capacity. Referring to Taxiway D, the very nature of this component of airport expansion would permit increased capacity, to wit, **"Good runway to taxiway access minimizes the time that an aircraft operation blocks a runway, which makes the runway available more quickly for a subsequent arrival or departure."** It's a very simple formula:
[more planes + less time per plane on runway = increased airport capacity]. 15

Concluding statement: The Mitigated Negative Declaration relating to the Airport Development Agreement should not be adopted. It is incomplete, inadequate, and legally deficient. The most critical element underpinning the basis for the Negative Declaration has not been disclosed in any detailed way, shape, or form to the public in variance with State law (CEQA). It is disingenuous to suggest that the millions of dollars in acquisition and development costs the Airport Authority will incur are isolated projects to streamline operations. Rather, the proposed development agreement obfuscates ultimate plans for the development of a new airport terminal. It has been secretly prepared and concealed from public view. It simply attempts to forestall and circumvent legitimate environmental concerns of huge, nearby projects' cumulative and collective impacts. Adopting this Negative Declaration in the absence of full public disclosure of all the subject project's components and potential environmental impacts would violate both the letter and intent of CEQA and by any sense of common understanding be illegal on its face. 16

Thank you,

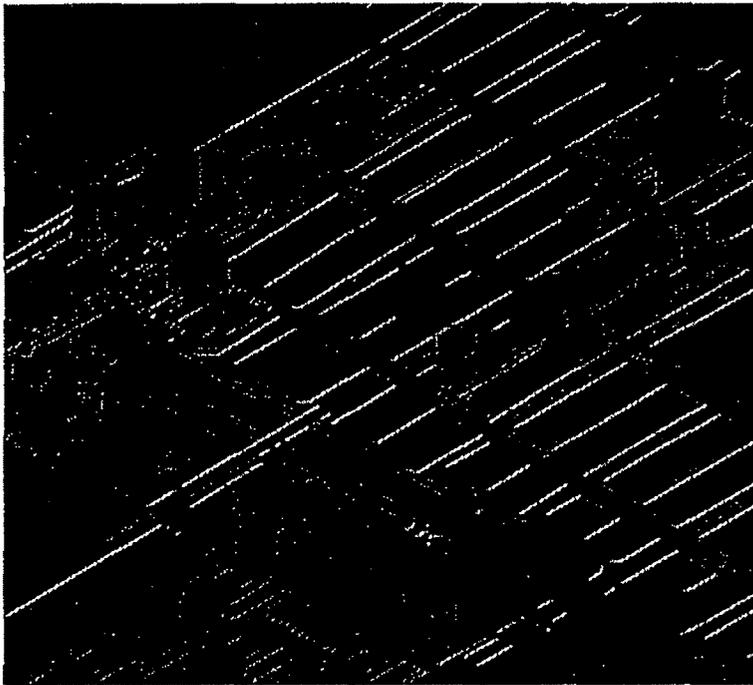


David W. Gordon, O.D.

Attachments: Cover page and P. xv Burbank Center Plan, etc. EIR, March 1997

Draft Environmental Impact Report

**Burbank Center Plan
South San Fernando Redevelopment Project**



SCH # 97011051

March, 1997

City of Burbank
Burbank Redevelopment Agency

Impact Category	Potential Environmental Impact	Mitigation Measures	Significance with Mitigation
2. Significant Environmental Impacts That Can Be Avoided or Mitigated (Section 15126(c) of the State CEQA Guidelines)			
Traffic	Addition of substantial traffic to local street network	<ol style="list-style-type: none"> 1. Overall Program Implementation. Prior to approval of any major development project (any project greater than 100,000 square feet in floor area, greater than 100 dwelling units, or greater than 100 peak-hour trips inbound and outbound) the City will have in place a circulation improvements program for projects within the Burbank Center Plan area which allocates the cost of the improvements below (other than improvements which are tied to specific development or are included in another capital improvements program) to projects based on their location, square footage, trip generation characteristics, or other appropriate measure of project impact. 2. Individual Development Project Contribution to Capital Improvements. Each project in the Burbank Center Plan area will be required to contribute an equitable share of project costs to the capital improvements outlined below based on project trip generation and location. 3. Implementation Funding. The City will fund the improvements below based on funding available from development fees or other revenues as appropriate, based on the need considering the location of projects from which fees were collected, development within the Burbank Center Plan area, and other criteria as outlined in a public improvements program for the project area. 4. Regular Program Review. Every five years, or after development of projects resulting in a total of 2,000 peak-hour trips since the most recent major traffic study revision, the City will comprehensively evaluate the remaining capital improvements required to provide an acceptable level of traffic service within and to the Burbank Center Plan Area, and adjust the list of improvement projects and development fees as appropriate to achieve the level of service objectives outlined in the City's General Plan. 5. Capital Improvements in Burbank Center Plan Area. The following specific traffic improvements are needed to provide the level of service outlined in this EIR. These measures shall be included in a capital improvements program with associated development fees, and shall be implemented as their need is identified and as development takes place in the Burbank Center Plan Area so that the full list of improvements can be completed at the time the anticipated development is complete. The need for these improvements shall be evaluated in each regular program review, and the improvements list and developer fee modified as appropriate based on current conditions at the time of the review. 	Not significant

DR. DAVID W. GORDON

1. In accordance with the California Environmental Quality Act (CEQA) Guidelines, the Draft MND/IS provides a complete description on pages 1 through 17 of the Draft MND/IS that identifies all of the potential physical changes that could occur as a result of the proposed Project. This project description has been updated by the decision of the Authority not to include a rental car center on the A-1 North Property (see Section B of this document).
2. The proposed Development Agreement between the Burbank-Glendale-Pasadena Airport Authority (Authority) and the City of Burbank (City) is the subject of the analysis contained in the Draft MND/IS. This document provides a comprehensive review of all potential impacts that could occur as a result of the components of the proposed Project. Given the nature of the proposed Project, the only cumulative impacts that could occur would be related to surface traffic in the vicinity of the Airport. However, as stated on page 57 of the Draft MND/IS, the proposed Project would not contribute to any increase in vehicle traffic on any streets in the vicinity of the Airport. Therefore, the proposed Project would not contribute to any cumulative traffic-related impacts. Please also see the responses to comments #2 and #5 of the Philip and Carolyn Berlin letter regarding provisions of Development Agreement.
3. The proposed physical changes as a result of the proposed Project are described on pages 3 through 16 of the Draft MND/IS. With the Authority's decision not to develop a rental car center on the A-1 North Property, an update to the project description is provided in Section B of this document. The land use impacts associated with the proposed Project are described on pages 36 through 38 of the Draft MND/IS.
4. The physical changes that could occur as a result of the proposed Development Agreement are described on pages 3 through 16 of the Draft MND/IS. With the Authority's decision not to develop a rental car center on the A-1 North Property, an update to the project description is provided in Section B of this document. Please also see the responses to comments #2 and #5 of the Philip and Carolyn Berlin letter and the response to comment #2 of this letter.
5. The project description on pages 3 through 17 of the Draft MND/IS explains the full scope of the proposed Project, and no portion of the proposed Project has been chopped off for its own separate environmental review. The commenter provides no example of what future activities after the expiration of the Development Agreement have been excluded from the proposed Project. There are no reasonably foreseeable future plans or activities to include for analysis at this time. The Development Agreement precludes the Authority from development of a new or relocated terminal facility for a period of ten years, further demonstrating that relocation of the terminal to the B-6 Trust Property is not reasonably foreseeable. The unsubstantiated opinion regarding development and uses does not constitute substantial evidence sufficient to undermine the traffic study completed for the proposed Project. Please also see the responses to comment #1 of the

Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter and comment #6 of the Philip and Carolyn Berlin letter.

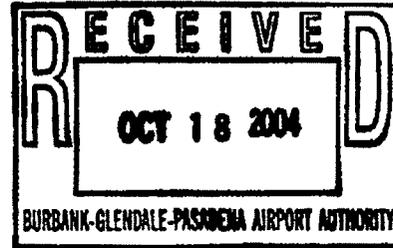
6. As stated on pages 3 through 16 of the Draft MND/IS, the four specific projects constitute the physical changes that could occur as a result of the Development Agreement. With the Authority's decision not to develop a rental car center on the A-1 North Property, some of the components associated with the development of the A-1 North Property have changed. These changes are in Section B of this document. The vested rights established by the Development Agreement would not result in any physical impacts on the environment beyond those analyzed for the specific contemplated projects and disclosed in the Draft MND/IS.
7. The rezoning of the two parcels would be necessary to allow for the development of specific components of the proposed Project. The impacts associated with these components of the proposed Project are discussed throughout the Draft MND/IS.
8. As stated on pages 3 through 16 of the Draft MND/IS, the four specific projects constitute the physical changes that could occur as a result of the Development Agreement. With the Authority's decision not to develop a rental car center on the A-1 North Property, some of the components associated with the development of the A-1 North Property have changed. These changes are in Section B of this document. The impacts associated with these four specific projects are described throughout the Draft MND/IS. In addition, Section C of this document provides an updated analysis of the impacts of the proposed Project assuming no development of a rental car center on the A-1 North Property.
9. Please see the responses to comment #2 and #5 of the Philip and Carolyn Berlin letter.
10. The proposed Project specifically prohibits the Authority from development of a new passenger terminal. Therefore, it is not appropriate to address impacts from a project component that is expressly prohibited from occurring. The traffic analysis contained in the Draft MND/IS analyzed the impacts, both project-related and cumulative, that could occur as a result of the proposed Project. Please also see the response to comment #6 of the Philip and Carolyn Berlin letter.
11. As described on pages 3 through 16 of the Draft MND/IS, the proposed Project would not result in more than 100,000 square feet in floor area or more than 100 dwelling units. In addition, as stated on page 57 of the Draft MND/IS, no new vehicle trips would be associated with the proposed Project. Therefore, the proposed Project is not considered to be a "major development project" in accordance with the City of Burbank's definitions.
12. The Authority is not the lead agency for any of the projects identified as cumulative projects on page 57 of the Draft MND/IS. The City of Burbank will be the lead agency for environmental review associated with these projects and will make a decision as to the type of environmental review that will be necessary for these projects.

As stated on page 57 of the Draft MND/IS, the proposed Project would not contribute to any increase in vehicle traffic on any streets in the vicinity of the Airport. Therefore, the proposed Project would not contribute to any cumulative traffic-related impacts.

13. The Draft MND/IS refers to Planned Development zone changes associated with the parking lot on the A-1 North Property and the Lot A parking lot relocation. The impacts of those proposed changes are fully analyzed in the Draft MND/IS. Other zone changes are not contemplated at this time.
14. Taxiway D would be used to route cargo aircraft and GA aircraft taxiing to the west and northwest side of the Airport. Appendix A of the Draft MND/IS clearly states the purpose and need for Taxiway D is to increase efficiency of the aircraft ground movements, increase overall safety at the airport, and reduce air traffic controller workload.
15. Please see the response to comment #5 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter.
16. Please see the responses to comments #2 and #5 of the Philip and Carolyn Berlin letter and comment #5 of this letter.

October 17, 2004

Dan Feger P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, Ca. 91505



Dear Mr. Feger

Subject: Notice of Intent to adopt a Mitigated Negative Declaration

I am opposed to the Mitigated Negative Declaration. The reason for my opposition is that the proposed Development Agreement, acquisition of additional land, etc. is an attempt to piecemeal in expansion of the Airport without the need for a full EIR as should be required. The following paragraphs denote the evidence which I have noted in the proposed Negative Declaration which indicates an attempt to piecemeal in expansion.

Page 17: Noted under "Projects not to be Approved or Constructed" are six expansionary projects which the Authority agrees not to undertake for a seven year period. Specifically excluded from these six projects is the right to build and additional story, or stories, on to portions of the existing terminal building. Since an additional floor, or floors, on the existing terminal building would be expansionary, and would require a full EIR, this exclusion of potentially expanding the existing terminal should nullify the entire proposed Negative Declaration.

1

Page 7: It is noted that the Authority would acquire an approximate 6-acre graded but unpaved portion of the A-1 North property. While it is noted that this six acres provides for the addition of 764 more parking spaces these additional spaces are not accounted for in the total number of parking spaces. This alone should nullify the entire Negative Declaration.

2

Page 12 Table 3: It is noted that there will be an addition of 385 employee parking spaces. This huge addition of employee parking spaces indicates a great deal of expansion of the airport. Instead of spelling out the potential increase in the number of employees at the airport you have chosen to bury these 385 additional employee parking spaces in table 3 without comment. Due to a potential increase in the number of employees it is reasonable to assume that there will be an additional number of vehicle trips, an increase in the number of flights, and increased pollutants as a result of these factors. This potential increase in vehicle trips and increase in flights and, the resultant increase in pollutants should be spelled out in a full EIR.

3

Page 16: It is noted that Taxiway D, which is proposed to be 1,650 feet in length, will be added just north of Runway 8/26. What is not spelled out in this request for a Negative Declaration is that this proposed Taxiway increases the capacity of the airport by providing a holding area for incoming planes to await a gate. The issue of additional

4

capacity, which a holding area would provide, was fully addressed in the PERC Committee Report of October 2002. A full EIR should be done to assess the potential increase in flights, and pollution, which this new Taxiway has the potential to cause to occur.

4
cont.

Page 17: It is noted that the Authority would not construct any public vehicle parking facility in the Southwest Quadrant of the Airport for four years after the completion of the A-1 North Property. The proposed number of parking spaces in Southwest Quadrant should be spelled out and included in a full EIR rather than be piece mealed in four years from now. For this reason the Negative Declaration should be ruled invalid and a full EIR completed.

5

P. 21 and P. 22, Table 4: The claim is made that by consolidating valet parking in the Valet South Lot, and the A-1 Lot, that there would be a reduction in approximately 221,000 vehicle miles traveled per year and that reductions in pollutant emissions would be as follows: A reduction of 0.63 lbs. per day of nitrogen oxide (NOX), a reduction of 0.49 lbs. per day of hydrocarbons (HC), a reduction of 8.27 lbs. per day of carbon monoxide (CO), and the reduction of 9.81 lbs. per day of particulate matter (PM). What is not noted is that these reductions may prove temporary at best. It is possible that a new terminal may be built on the B-6 Property after ten years. If this were to occur, the shuttling of vehicles from the A-1 North Property to a new terminal would reverse all of the reductions claimed in this proposed negative declaration. A Master Plan and a full EIR should be done to assess whether these claimed reductions in pollutants will have any effect beyond seven years.

6

P. 23 and Appendix A, P. A-7 & A-8: It is noted that the proposed Taxiway D would be wide enough to permit aircraft to pass each other and eliminate any unnecessary queuing or idling on the Taxiway. Given that this Taxiway is wide enough for aircraft to pass it is then wide enough for incoming airliners to wait in a holding position until a gate at the terminal opens up. It is clearly noted on page A-8 that the lack of a Taxiway last summer caused a capacity restraint due to the fact that "there were few places to have these aircraft wait until their gates became available." Since the proposed Taxiway D would provide the needed holding space and, since it would thereby increase airport capacity, a full EIR should be done to determine whether a net increase in pollutants would be generated rather than the net reduction which the airport claims.

7

Appendix A: I have noted that aircraft which would utilize the proposed Taxiway D would be required to cross Runway 8-26. It is reasonable to believe that in the future, probably at the end of the proposed ten year moratorium on construction of a new terminal, the FAA is then likely to declare that having aircraft crossing Runway 8-26 is unsafe and demand that a new terminal be built on the B-6 Property to mitigate this condition. For this reason alone a Master Plan and a full EIR should be required to determine the potential impacts which a new terminal on the B-6 Property would entail.

8

P. 45 and Figure 6: As a former member of the FAA Part 150 Advisory Committee I know only too well that the noise contours as projected by flight data are really not

9

reflective of the noise impacts endured by residents who live only a short distance outside the calculated CNEL 65 Contour. As noted in Figure 6 and Table 7 there is a substantial increase in acreage impacted (12.12 acres) east of the airport which will be caused by the completion of the proposed Taxiway D. While it is true that these acres are zoned M2 what is not noted is that just a bit further east of the 65 CNEL Contour are residences which will be negatively impacted by the increased use of Runway 8 as a result of the availability of Taxiway D. Further, as noted in Table 7 the total increase in acreage of 25.60 acres which will be included in the 65 CNEL Contour as a result of the completion of Taxiway D is significant and presages an increase in aircraft activity and pollutants. A full EIR should be completed to determine the increase in pollutants which will be generated.

9
cont.

There are numerous references in the medical literature which point to the hazards to health which are caused by an increase in pollutants. The potential for an increase in pollutants due to increased flights and increased vehicle trips is spelled out in this communication. For reference purposes I have noted some recent journal articles which clearly associate health hazards with pollutants:

“Traffic related Air Pollution near Busy Roads” Amer. Jour. Of Respiratory and Critical Care Medicine Vol. 170 pages 520-526 (2004)

“Association between Traffic Volume and Health Care use for asthma among residents at a U.S.-Canadian Border Crossing Point” Jour. Of Asthma Vol. 41 (3) pages 289-304 (2004)

“Urban Air Pollution and Asthma in children” Pediatric Pulmonology Vol. 38 (3) pages 198-203 Sept. 2004-10-18

10

“Effects of Air Pollution on the respiratory health of asthmatic children living in Mexico City” Am. Jour. Of Respiratory and Critical Care Medicine Vol. 154 pages 300-307 August 1996

“Effect of Air Pollution in asthma and respiratory allergy” Otolaryngology and Head and Neck Surgery Vol. 114 pages 242-247 February 1996

“Bronchiolitis poses a Significant Public Health Problem” Pediatric Annals Vol. 33 (7) pages 454-459 July 2004

“Traffic Related Pollutants in Europe and their effect on allergic disease” Current Opinion in Allergy and Clinical Immunology Vol. 4 (5) pages 341-348 October 2004

To summarize my opposition to the proposed Mitigated Negative Declaration: This document was prepared without a Master Plan, without a Development Agreement, or even a Formal Application to the City of Burbank. Given these facts, in addition to the

11

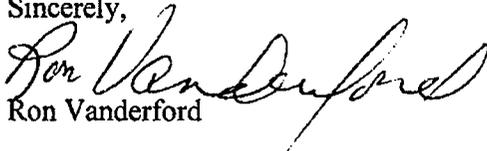
numerous flaws in the proposed NEG-DEC which I have noted in this communication, it is my belief that the entire Mitigated Negative Declaration should be nullified and that a full EIR with complete disclosure should be done instead.

It is interesting to note that the "Platt Project," which is proposed for less than 4 acres of land located between Olive and Alameda Avenues in Burbank, was required to have a Master Plan and a full EIR. The potential negative environmental impacts which would accrue at the airport from piece mealing in the following: Additional parking in the Southwest Quadrant within four years, the addition of an additional story, or stories, to portions of the existing terminal, the addition of 385 more employee parking spaces, the ability to add 764 more parking spaces on the ungraded portion of the A-1 North Property, the elimination of the proposed reduction in emissions by utilizing the A-1 Property for valet parking if a new terminal is built on the B-6 Property, and a potential requirement by the FAA that a new terminal be built on the B-6 Property to eliminate runway crossings on Runway 8-26 greatly outweigh any possible negative environmental impacts associated with the "Platt Project."

11
cont.

There is no reason why the airport should be given favored treatment over other developers in Burbank. No Master Plan, No EIR, No Deal.

Sincerely,


Ron Vanderford

839 E. Cedar
Burbank, Ca. 91501

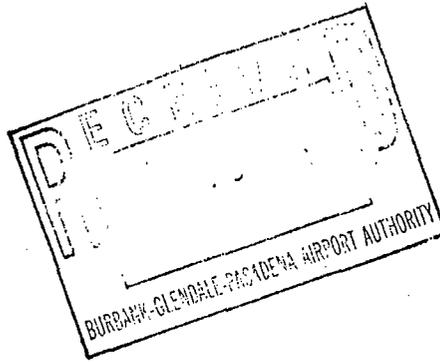
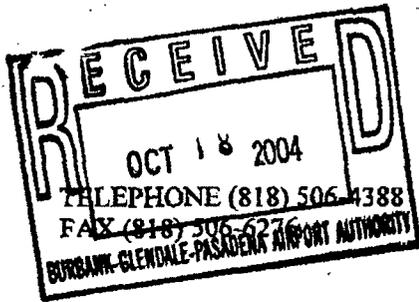
Cell 818 427-2724

RON VANDERFORD

1. The commenter suggests that the Authority may have plans to expand the existing passenger terminal building by construction of additional stories at the terminal. The text stating that there would be no expansion of the existing Airport terminal building footprint includes within its scope no expansions through construction of additional stories, which would constitute an expansion of the floor area. Therefore, the commenter's assertion that an expansion of the terminal could occur is not true.
2. The 764 parking spaces referenced on page 7 of the Draft MND/IS are based on the number of spaces that were included in the original permit for grading and development on the A-1 North Property. This was used to determine the total number of parking spaces on the A-1 North Property. Page 7 also indicates that the total number of parking spaces that could be accommodated on the A-1 North Property is 2,940 spaces. This includes the 764 spaces. This is the basis for the number of public long-term and valet parking spaces planned as part of the proposed Project (see Table 2 on page 11 of the Draft MND/IS). Please also see Sections B and C of this document for updated information regarding the Authority's decision not to include a rental car center on the A-1 North Property.
3. The 385 employee parking spaces referenced by the commenter do not constitute spaces for new employees. Rather, these spaces would be dedicated for employees who currently park in other locations. There is no expected increase in the number of employees at the Airport as a result of the proposed Project.
4. Please see the response to comment #5 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter.
5. Please see the response to comment #5 of the Philip and Carolyn Berlin letter.
6. With respect to alleged plans for relocation of the passenger terminal, please see the response to comment #6 of the Philip and Carolyn Berlin letter. For a discussion of master planning at the Airport, please see the response to comment #1 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter.
7. The completion of Taxiway D would improve the queueing and sequencing of aircraft on the ground. This would not result in any increase in airfield capacity. Please also see the response to comment #14 of the Dr. David W. Gordon letter.
8. The development of a new passenger terminal on the B-6 Property is speculative and not included as part of the proposed Project. Therefore, it is not appropriate to evaluate any changes to the use of the airfield that are not contemplated to be part of the proposed Project. Please also see the response to comment #1 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter. Further,

the asserted future actions by the FAA are speculative and incapable of meaningful CEQA review at this time

9. For a discussion of changes in the noise contours that result from changes in the utilization of Taxiway D, please see the response to comment #2 of the Eden Rosen letter. No changes in the number of aircraft operations would occur as a result of the proposed Project. Therefore, no increase in air pollutant emissions would occur as a result of the completion of Taxiway D.
10. As stated on pages 43 and 57 of the Draft MND/IS, no increases in the number of aircraft operations or in the number of vehicle trips on roadways in the Airport vicinity would occur. Therefore, no impacts of air quality-related health hazards would occur as a result of the proposed Project.
11. For a discussion of why there is no segmentation associated with the proposed Project, please see the responses to comment #1 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter, the response to comment # 6 of the Philip and Carolyn Berlin letter, and the response to comment #5 of the Dr. David W. Gordon letter.



The UPS Store
10061 Riverside Drive
Toluca Lake, CA 91602

The UPS Store

To: Don Feger
Dep'y. Exec. Director

Fax #: (818) 848-1173

Date: 18th

of Pages (including cover sheet):

From: R.C. "Chappy" Czapiewski Phone #: (818) 761-4182

Subject: Airport Mitigated Negative Declaration Comments

I have been watching the Airport Authority and the employees who do the work for decades. In your NED you deny the existence of 2 historical hangars which have been located on the south end of the field. Where do you, in "Section V Cultural resources" do you recognize the very historical resources known as Hangars one and 2. They're located in what you call the southwest Quadrant. As usual you give Hangars one and 2,

New Name.

short shrift.

New Low UPS' Rates.

[More] see Don

Same Helpful Services.

Elsmore's Leader piece; wednesday Oct 6, 2004

If you are not the intended recipient, do not disclose, copy, distribute or use this information. If you received this transmission in error, please call immediately to arrange return of the documents at no cost to you.

a. Government agency

In the spring of 1997 the Authority obtained an order to take possession of 130 acres; referred to the B-6 property

b. Superior Court - stipulated order -

Case No. EC022341, July 9, 1997. The

① Authority agreed to perform ~~no~~ construction or make any use of the B-6 property in furtherance of any plan to expand or enlarge the Airport until further order of the court

② Authority may use approximately 11 of 130 acres to provide temporary overflow parking.

c. Proposed Agreement for the Transfer of Title to B-6 Property August 31, 1999

" City Burbank - special Attorney, ... the Trustee may sell that property

d. Final Order of condemnation (with consent of city of Burbank, Nov. 19, 1999

① Restated Escrow Agreement and the ~~related~~ restated Trust Agreement

② Authority gets stipulated order "To the extent such uses do not constitute the expansion or enlargement of the Airport.

e. Notice of Failure to execute a development Agreement. Inquiring

People question whether this document has been legally filed according to L.A. County Recorder's office.

④

City Council update of Calif. Environ^{ment}
Quality Act, Aug. 24, 2004

Attorney Peter Kirsch said "The Trustee
is obligated to sell that property unless
City Council - takes action

Airport Authority Mtg. Sept. 23, 2004

The public wants to know: "Why
do the Airport and the Burbank City
Staff keep jockeying for position
~~over~~ for control over B-6 when the
COURT Agreements, including All properties,
stipulate it [the property] is out of
your hands. The property is the
responsibility of the TRUSTEE.

2
cont.

30

2

Burbank Leader

Day/Date Wed Oct 6, 2004

Troubling questions on B-6 among the paperwork

For years we have read reports of how the city of Burbank and the airport are negotiating to find a way to save the B-6 property for a new terminal. I believe they gave up that right a long time ago. It

was a plan they crafted with their own hands.

The May 30, 2000, signatures by Burbank Mayor Bill Wiggins and Burbank-Glendale-Pasadena Airport Authority President Carl Meseck on a document called "Notice of Failure to Execute a Development Agreement" was a milestone few have chosen to disclose or explain.

The circumstances surrounding this document not being recorded in the land title records of Los Angeles County until Aug. 8, 2000, are clouded with intrigue. Furthermore, the significance of that event has been carefully hidden.

There is a Superior Court, County of Los Angeles, "Final Order of Condemnation, with Consent of City of Burbank" recording dated Nov. 19, 1999, that says, "... if a valid Final Development Agreement is not concluded, as evidenced by a Notice of Failure to Execute Development Agreement ... signed and acknowledged by the city and recorded ... no right, title and interest in the Trust Property shall be transferred to, or vest in, the Authority and ... the Trust Property shall be ~~and~~ transferred by the Trustee ... " So it

The court papers continue to say, "The Trustee ... shall have the sole right to possess and occupy the Trust Property to the exclusion of all others ..."

In layman's language, what all these technical words mean is that the city and the airport told the court they accepted an arrangement where a trustee will have full powers to sell the B-6 trust property in the event that the city and the airport did not come to terms on a development

agreement. They didn't reach an agreement, hence the signed notice.

On Aug. 4, 1999, 10 months before creating the court document, the city and the airport published a framework for settlement. It was a laundry list of items to be used for three phases of construction. It included 19 gates, a footprint of 430,000 square feet for a new terminal, and 8,000 public parking spaces. It also contained the following: "It is the goal of the two sides to allow the authority to secure as soon as possible the ability to acquire title of the B-6 property."

There is a memo to the Burbank City Council dated March 19, 2003, from Burbank City Atty. Dennis Barlow stating, "If a decision is made to sell all or part of the B-6 property, that decision would be made by the authority, not forced by the city."

All these events present a crystal-clear picture of cooperation between the city and the airport, with both parties trying to avoid the appearance of culpability to undermine the sale of the property. The goal to build a new terminal has always been lurking in the background, but they just couldn't find a palatable way to explain it in the face of public opposition.

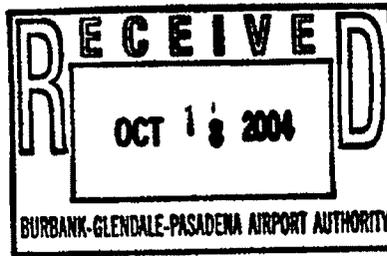
What kind of bizarre explanation can the city and the airport concoct now to explain why, as far back as November 1999, they told the court the B-6 property would be sold by a trustee? Why should anyone trust these people who are willing to tell the court one thing and then constantly conspire to do another?

DON ELSMORE
Burbank

R. C. "CHAPPY" CZAPIEWSKI

1. The Authority acknowledges that an analysis of the cultural resource significance of Hangars 1 or 2 would occur if any development were contemplated in the southwest quadrant. However, the proposed Project does not include any physical changes to the southwest quadrant of the Airport. Because no changes to Hangars 1 or 2 would occur as a result of the proposed Project, it is not necessary to determine if these buildings are cultural resources.
2. The commenter cites past legal actions involving the Authority and City, but raises no environmental issue requiring analysis under CEQA. Therefore, no further analysis is required.

Kevin Muldoon
716 S sunset Cyn Dr.
Burbank CA 91501



10-18-04

My objections to your intent to Adopt a Mitigated Negative Declaration.

First it was impossible for me to fully evaluate the Mitigated Negative Declaration for development when the said development is yet unavailable to the public. Therefore I cannot form an educated decision on the contents of the Mitigated Negative Declaration and have only highlighted a few of my concerns.

1

No development available to public.

In all most all cases you used the least and not the worst case scenario to evaluate environmental impacts. Example page 41 XI

2

There are a four seven and ten-year agreements that have not been made clear to as what they include. Example page 17

3

You have not included or used worse case scenario in you evaluation of air quality. Example there is no mention of taxi operations.

4

You have not included parts of the development currently under City review that will substantially affect the environmental effects of this project.

5

You are adding over 19,700 square footage of terminal satellite facilities. This is an expansion of the airport.

6

With completion of taxiway D, flights will now depart to the east. This will cause the greatest environmental effect of all the projects on the residents of Burbank.

7

Example Fig A-2

The existing hazards and hazardous material were not accounted for or taken into consideration of this development. | 8

You have no general plan that would allow the public to better understand the proposed development and how it corresponds with the airport 10-year plan. Use of the B-6 property has not been discussed. | 9

You should have not been the lead agency. You were not impartial in you environmental review. | 10

I have included a copy of my Negative Declaration to be part of my written response. To be recorded as part of the questions that where raised by the public. Any questions you have of my highlight may be addressed to me during your development review process.

Kevin Muldoon

Kevin M. Johnson
716 S Sunset Canyon Dr
Burbank CA 91551

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

1. **Project Title:** Burbank-Glendale-Pasadena Airport Authority
Development Agreement and Related Actions
2. **Lead Agency Name and Address:** Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Building #9, Room 210
Burbank, CA 91505
818-840-8840
3. **Contact Person and Phone Number:** David J. Full, AICP
415-896-5900
4. **Project Location:** Bob Hope Airport
2627 Hollywood Way
Burbank, CA 91505
5. **Project Sponsor's Name and Address:** Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Building #9, Room 210
Burbank, CA 91505
6. **General Plan Designation:** Airport and General Industrial
7. **Zoning:** Airport, M-2, Planned Development (proposed)
8. **Description of Project:** The Burbank-Glendale-Pasadena Airport Authority (Authority) proposes to execute a development agreement with the City of Burbank (City) that would address development at Bob Hope Airport (Airport) for a fixed term of seven years. Generally, the proposed development agreement would freeze in place existing City rules and regulations governing development at the Airport in exchange for the Authority's agreement not to pursue certain other development and uses for the term of the development agreement. The agreement would grant vested rights to the Authority to proceed with the following four specific projects: (1) A-1 North Property Acquisition, which would enable the realignment of the terminal loop roadway, the development of a valet parking plaza and building, construction of an underpass to connect east and west sides of the A-1 North Property to allow integrated parking operations on both sides of the realigned Terminal Loop Roadway, development of a rental car center customer building, development of structured rental car parking (one elevated level), development of a rental car center quick turn around facility, and operation of passenger parking facilities, development of self parking facilities, and related Public Utility Code Section 21661.6 and zoning authorization; (2) realignment of the Terminal Loop Roadway west of the

Hollywood Way / Thornton Avenue intersection; (3) reconfiguration and partial relocation of Parking Lot A, and related Public Utility Code Section 21661.6 and zoning authorization; and (4) completion of Taxiway D. The Initial Study / Mitigated Negative Declaration also considers discretionary actions that will be taken by the City related to the Development Agreement, which are more fully described in the Initial Study.

9. Surrounding Land Uses and Setting: The location of the proposed project is at the Airport, on a portion of the Adjacent Property, and on a portion the A-1 North Property. A portion of the proposed Project would occur on property that is on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. This area has been previously developed. The occupied properties in the vicinity of the project area are Airport-related land uses.

10. Other public agencies whose approval is required: City of Burbank and the Los Angeles County Airport Land Use Commission

11. Public Review Period: *Begins:* 24 September 2004

Ends: 18 October 2004

12. Proposed Date of Authority Hearing on the Mitigated Negative Declaration: 25 October 2004

13. Document Location: Administrative Offices
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, California 91505

Anyone interested in this matter is invited to comment on the document in writing to:

Dan Feger, P.E.
Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, California 91505

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- Aesthetics
- Agriculture Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology / Soils
- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Population / Housing
- Public Services
- Recreation
- Transportation / Traffic
- Utilities / Service Systems
- Mandatory Findings of Significance

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

For

**BOB HOPE AIRPORT
DEVELOPMENT AGREEMENT
AND RELATED ACTIONS
INITIAL STUDY**

23 September 2004

PROJECT DESCRIPTION

INTRODUCTION

The Burbank-Glendale-Pasadena Airport Authority ("Authority") is the lead agency for the purpose of conducting environmental review of several proposed specific project components and a proposed development agreement between the City of Burbank ("City") and the Authority. These specific project components and the proposed development agreement together comprise a "Project" pursuant to the California Environmental Quality Act ("CEQA"). Figure 1 shows the locations of these various project components. This environmental review is being conducted pursuant to CEQA and the City has been deemed a responsible agency for the same purposes. The Authority and City have agreed, pursuant to CEQA Guideline 15051, regarding their respective roles as lead and responsible agencies in connection with the Project.

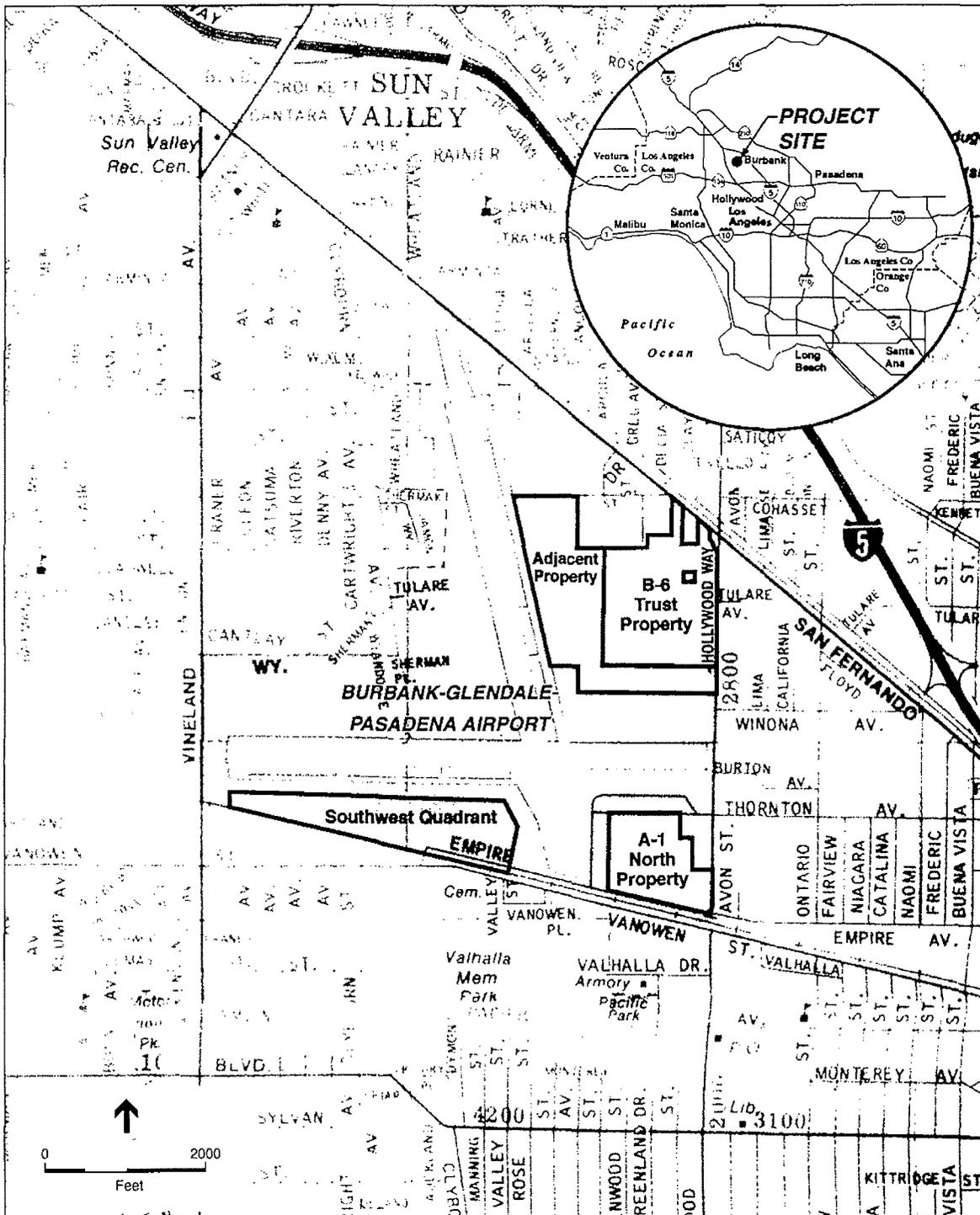
As the lead agency, the Authority, in consultation and cooperation with the City, has prepared an Initial Study evaluating the potential environmental effects of the Project. As required by CEQA, in addition to the other issues analyzed, the Authority has considered whether the Project would result in a safety hazard or noise impact for persons using the Airport or for persons residing or working in the project area. The Initial Study concludes that the Project would not have a significant impact on the environment.

The Initial Study will be available for public review for a period of 20 days, beginning 24 September 2004 and ending 18 October 2004. Members of the public and public agencies may submit written comments to the Authority at any time during the 20-day public review period. If, based on the whole of the record before it, the Authority finds that there is no substantial evidence upon which to make a fair argument that the proposed Project may have a significant effect on the environment, the Authority will adopt the negative declaration and consider approval of the Project.

Prior to reaching a decision on the applicable components of the proposed Project, the City must consider the environmental effects of those components as shown in the Mitigated Negative Declaration prepared by the Authority and reach its own conclusion as to whether and how to approve the various components that comprise parts of the proposed Project within the City's jurisdiction. As such, the Authority and the City have coordinated and consulted throughout the environmental review process.

The following is a list of the discretionary approvals associated with the proposed Project.

- Development agreement between the City and the Authority
- Two Public Utilities Code (PUC Section 21661.6) Applications by the Authority
- Rezoning by the City of two parcels from M-2 to Planned Development



Development Agreement and Related Actions / 204014 ■
Figure 1
 Site Location Map

- Revisions to the 1999 title transfer agreements
- Municipal code amendments to the City's Zoning Ordinance and Building Code
- Los Angeles County Airport Land Use Commission Consistency Determination
- TEFRA (Tax Equity and Fiscal Responsibility Act) Hearing and Making of Findings by the City approving the Authority's issuance of tax-exempt financing

These approvals would enable the following actions by the Authority for certain project components:

- Purchase by the Authority of portions of the A-1 North Property
- Relocation of Parking Lot A onto the Adjacent Property
- Completion of Taxiway D on existing Airport property
- Reallocation of areas dedicated to parking on the A-1 North Property and relocation of rental car facilities to the A-1 North Property
- Realignment of the Terminal Loop Roadway onto the A-1 North Property

These approvals would enable the following action by the Authority and/or the City for certain project components (see Figure 1):

- Realignment of the Hollywood Way / Thornton Avenue / Terminal Loop Roadway Intersection

OVERVIEW OF PROPOSED PROJECT

The Authority proposes to execute a development agreement with the City that would address the extent to which the Authority can make changes to the Airport for a fixed term of seven years. Generally, the proposed development agreement would freeze in place existing City rules and regulations governing development at the Airport and limit or prohibit certain other development and uses for the term of the development agreement. The agreement also would allow the Authority to proceed with four specific projects described in detail below. The agreement also would allow the Authority and the City to meet the goal of working together to reduce nighttime noise in the Airport vicinity.

PROJECTS TO BE APPROVED AND CONSTRUCTED

The Project would include consideration of approval and implementation of the following four project components (see Figure 2):

- A-1 North Property Acquisition, which would include the acquisition of approximately 26.46 acres of property and would enable the realignment of the Terminal Loop Roadway, the development of a valet parking plaza, valet building, pick-up area porte cochere and valet parking and storage area, development of structured parking facilities (one elevated level) for rental car parking and storage, construction of an underpass to connect east and west sides of the A-1 North Property to allow integrated parking operations on both sides of the realigned Terminal Loop Roadway, development of a rental car center customer building, development of a rental car

center quick turn around facility, and development of passenger parking facilities, and related Public Utility Code Section 21661.6 Authorization

- Acquisition of 0.24 acres of the A-1 North Property for realignment of the Hollywood Way / Thornton Avenue / Terminal Loop Roadway Intersection
- Reconfiguration and Partial Relocation of Parking Lot A, and related Public Utility Code Section 21661.6 and zoning authorization
- Completion of Taxiway D

In addition to these four specific project components, the proposed development agreement would vest the currently applicable zoning for the term of the development agreement except as otherwise provided in the development agreement. Although no development in the subject area other than described above presently is contemplated by the Authority or the City, and no further development is reasonably foreseeable, development proposals, if any, during the term of the development agreement would be subject to the zone requirements of the applicable zone and subsequent CEQA review where applicable.

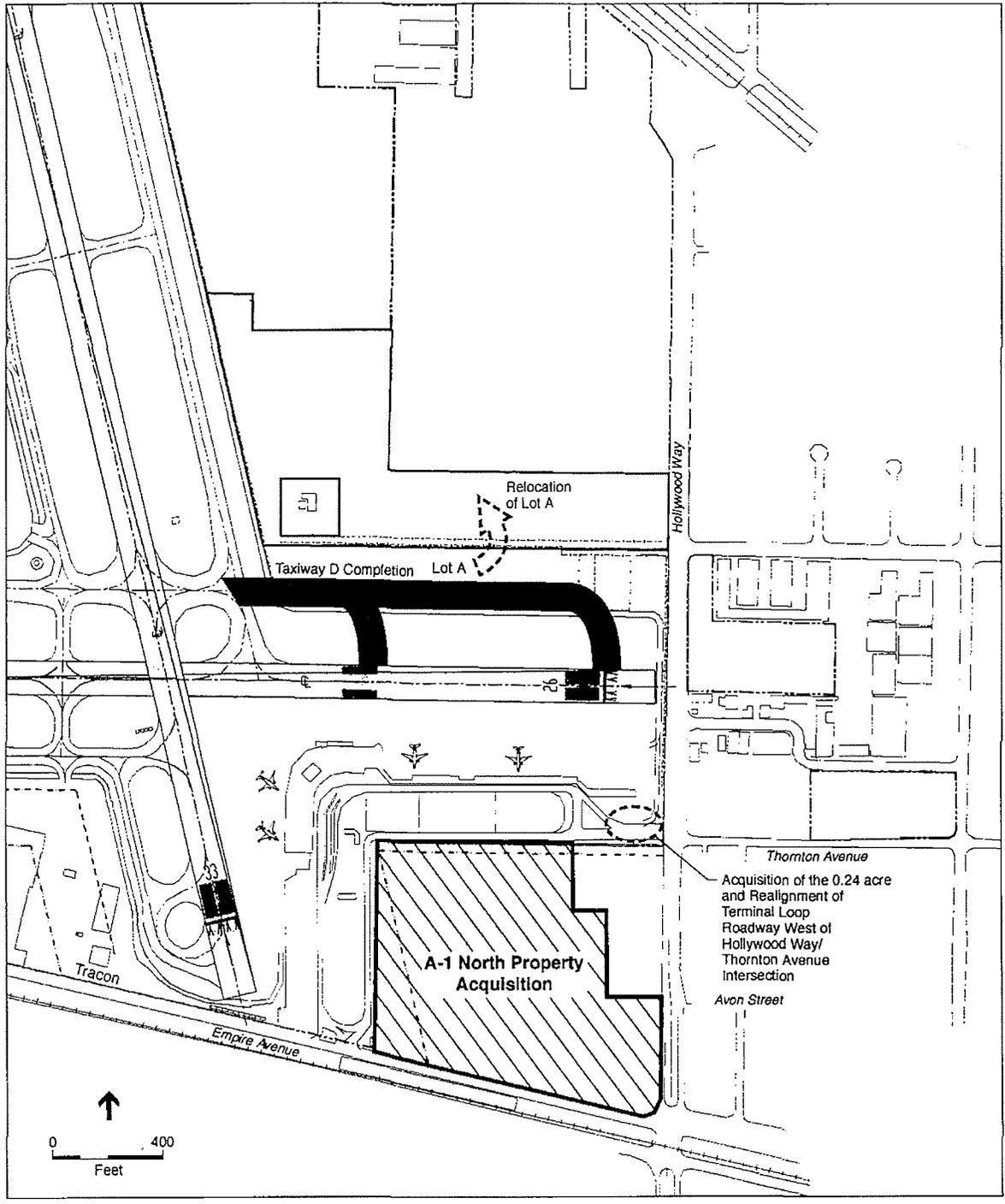
A-1 NORTH PROPERTY ACQUISITION

The A-1 North project component would result in the Authority acquiring a portion of the former Lockheed Corporation Plant A-1 North Property (“A-1 North Property”) that is adjacent to the Airport and continuing to use the acquired property for parking, although in a different configuration. See Figure 1 for the location of the A-1 North Property.

The Authority maintains a total of 5,554 public parking spaces for use by passengers and airport employees. Passengers use short-term parking, long-term parking, and valet parking at the Airport. The passenger parking spaces are divided among the following eight locations: Lot A, which is located in the northeast quadrant of the Airport; Lot B, which is at the southeast corner of Hollywood Way and Winona Avenue; Lot C, which is on the north side of Thornton Avenue east of Hollywood Way; temporary overflow Lot D, which is on the B-6 Trust Property; the Short-Term Parking Lot and the Short-Term Parking Structure, which are immediately south of the terminal; the Car Wash, which is north of the eastern end of the Terminal Loop Roadway; the Valet East (Yellow) Lot, which is immediately south of the terminal; and the Valet South (White) Lot, which is located between the terminal and Empire Avenue (see Figure 3 and Table 1).

One of the Authority’s parking lots currently is being used by airport employees: the Employee Lot, which is in the northeast quadrant of the Airport contiguous to Lot A (see Figure 3 and Table 1).

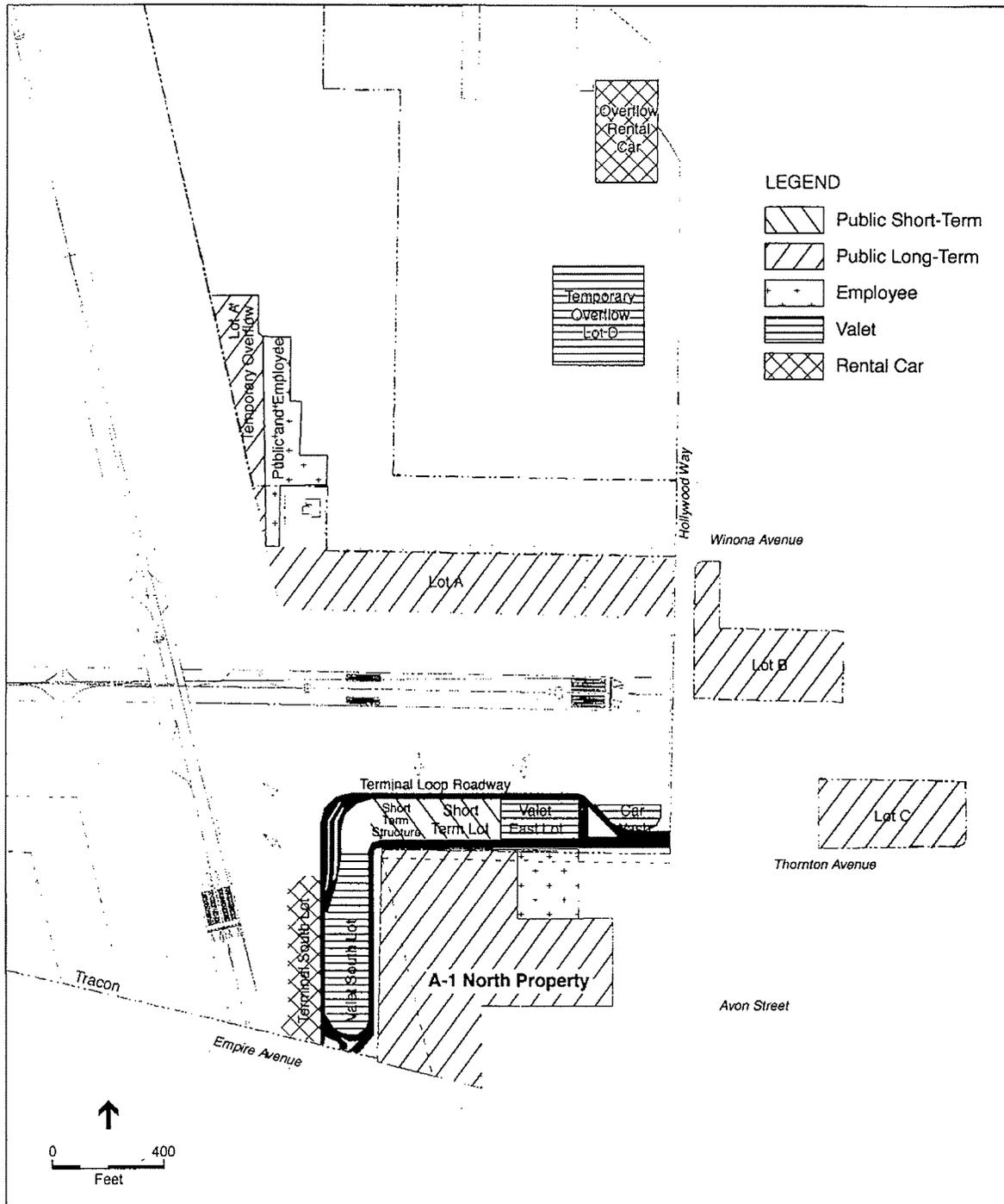
Off-Airport passenger and airport employee parking occurs at the A-1 North Property. This property is currently privately owned and operated. Parking at this location includes 2,176 spaces that have been paved and marked on approximately 21.2 acres (see Figure 3 and Table 1). A total of 7,730 public parking spaces exist on the combined lots maintained by the Authority and on the A-1 North Property (see the total for the Authority and the number of spaces on the A-1 North Property as shown in Table 1).



SOURCE: Environmental Science Associates

Development Agreement and Related Actions / 204014 ■

Figure 2
Projects to Be Approved and Constructed



SOURCE: Environmental Science Associates

Development Agreement and Related Actions / 204014 ■

Figure 3
Existing Parking Scenario

TABLE 1: EXISTING PASSENGER AND EMPLOYEE PARKING CAPACITY

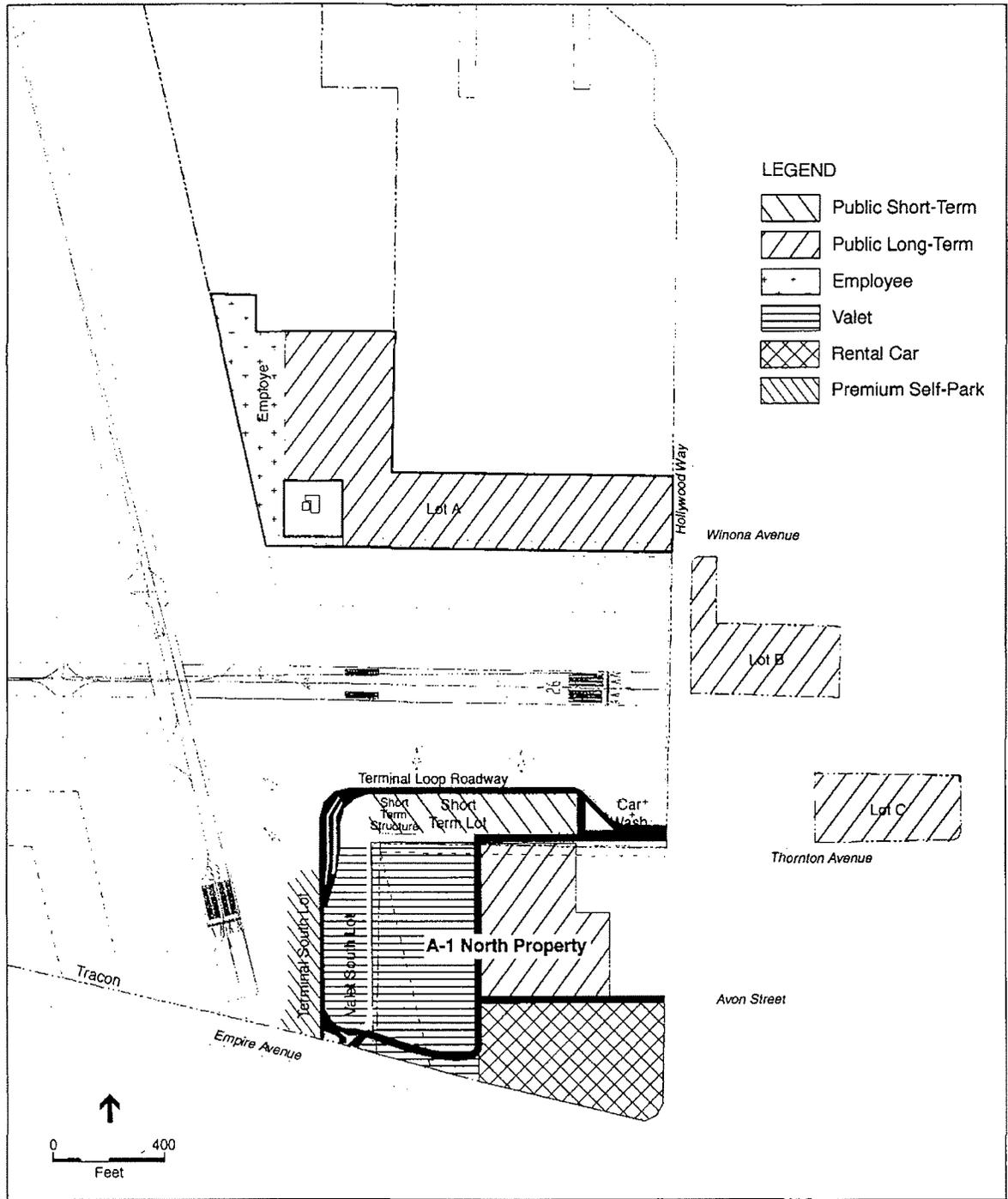
	Public Short-Term	Public Long-Term	Premium Self Park	Valet	Employee	TOTAL
A-1 Lot						0
Employee Lot /a/					196	196
Lot A /a/		1592				1592
Lot B		637				637
Lot C		518				518
Lot D /b/				1265		1265
Short-Term Structure / Lot	498					498
Car Wash				69		69
Terminal South Lot						0
Valet East Lot				197		197
Valet South Lot				582		582
AUTHORITY TOTAL	498	2747	0	2113	196	5554
A-1 NORTH (PRIVATE DEVELOPER) TOTAL	0	2176	0	0	0	2176
OVERALL TOTAL	498	4923	0	2113	196	7730

Source: Burbank-Glendale-Pasadena Airport Authority

/a/ The Employee Parking Lot and a portion of Lot A are used for temporary overflow parking as has been historically permitted.

/b/ The use of Lot D is governed by a 1999 stipulation which identifies its use for temporary overflow parking and the Authority has used it to store valet cars that are in excess of the on-Airport capacity.

As part of the Project, the Authority would acquire an approximate 6-acre graded but unpaved portion of the A-1 North Property. This portion of the A-1 North Property, if paved and landscaped, can accommodate approximately 764 self-park spaces. The Authority proposes to restripe and reconfigure the approximate 20.39-acre portion of the A-1 North Property to accommodate up to 2,940 spaces. This increased number of spaces is the sum of the existing 2,176 striped self-park spaces currently on the site, plus the 764 spaces of self-parking capacity that could be placed on the unpaved 6-acre portion of the A-1 North Property. This increased number of spaces can fit on the 20.39 acre portion because striping for valet storage allows more cars per acre to be stored than would normally be parked in a self-park configuration.



SOURCE: Environmental Science Associates

Development Agreement and Related Actions / 204014 ■

Figure 4
Future Parking Scenario

In addition to passenger and employee parking spaces, the Authority provides facilities for the operation of on-Airport rental car companies. A total of 300 rental car ready/return spaces are provided in the Terminal South Lot (Rental Ready Lot), which is immediately south of Terminal B. Approximately 1.5 acres of the B-6 Trust Property is used for temporary overflow parking for rental cars (see Figure 3). The Authority also provides an approximately 4.4-acre rental car maintenance and storage area in the southwest quadrant of the Airport off of Empire Avenue. In addition, some off-Airport rental car companies exist in the Airport vicinity. Parking associated with these off-Airport rental car companies exists at a variety of locations in the Airport vicinity, but none are controlled or operated by the Authority.

The proposed Project would result in changes in the number and distribution of passenger and employee parking spaces at the Airport (see Figure 4) as well as changes in areas designated for parking. The components of the proposed Project that would result in net increases and decreases in parking include the elimination of 1,265 overflow parking spaces on the B-6 Trust Property (see Lot D in Tables 2 and 3), the creation of 385 employee spaces on the Adjacent Property (see Employee Lot in Tables 2 and 3), the conversion of 300 ready return rental car spaces on the Terminal South Lot into 297 premium self-parking spaces, the conversion of 69 valet car wash spaces into 50 employee parking spaces, and the acquisition of parking spaces on the A-1 North Property.

The proposed Project would decrease the number of public parking spaces at the Airport by 254 spaces (the 764 spaces on the A-1 North Property plus the 297 premium self-parking spaces on the Terminal South Lot minus the 1,265 overflow parking spaces on Lot D on the B-6 Trust Property) and increase the number of employee parking spaces by 435 spaces (the 385 employee parking spaces in the Employee Lot and the 50 employee spaces converted from the valet car wash spaces). These figures are exclusive of rental car facilities; however, this component of the proposed Project would not result in a net increase in the number of rental car spaces because of expected retirement of off-airport parking facilities for rental cars.

To provide the Authority with some flexibility to respond to the needs of its passengers, the Authority anticipates that the type of parking that would occur on the A-1 Property could either be valet parking or a combination of valet parking and long-term public parking. Given the demand for valet parking, the minimum number of valet parking spaces on the A-1 North Property is assumed to be 1,826. Thus, the range of the number of valet parking spaces on the A-1 North Property would be 1,826 to 2,940 (assuming all spaces would be valet parking spaces). Conversely, the number of long-term public parking spaces would range from 0 to 1,114. In either case, the number of parking spaces on the A-1 North Property would be limited to 2,940. For the purposes of describing the greatest impact resulting from the acquisition of the A-1 North Property, it is assumed that of the 2,940 total parking spaces on the A-1 North Property, 1,826 would be for valet parking and 1,114 would be for public long-term parking. It is likely that the 1,826 valet parking spaces would be sited west of the northbound portion of the realigned Terminal Loop Roadway and that the 1,114 public long-term parking spaces would be sited east of the northbound portion of the realigned Terminal Loop Roadway. A possible variation in parking could locate some valet parking on the east side of the realigned Terminal Loop Roadway, if necessary, and that valet capacity combined with the remaining self parking capacity would not exceed 2,940 spaces. The

public long-term parking spaces would be accessible from either the northbound portion of the Terminal Loop Roadway or from the Hollywood Way / Avon Street intersection. Egress from the public long-term

TABLE 2: FUTURE PASSENGER AND EMPLOYEE PARKING CAPACITY

	Public Short-Term	Public Long-Term	Premium Self Park	Valet	Employee	TOTAL
A-1 Lot		1114		1826		2940
Employee Lot /a/					581	581
Lot A /a/		1592				1592
Lot B		637				637
Lot C		518				518
Lot D /b/						0
Short-Term Structure / Lot	668					668
Car Wash					50	50
Terminal South Lot			297			297
Valet East Lot						0
Valet South Lot				628		628
AUTHORITY TOTAL	668	3861	297	2454	631	7911
A-1 NORTH (PRIVATE DEVELOPER) TOTAL	0	0	0	0	0	0
OVERALL TOTAL	668	3861	297	2454	631	7911

Source: Burbank-Glendale-Pasadena Airport Authority

/a/ The Employee Parking Lot and a portion of Lot A are used for temporary overflow parking as has been historically permitted.

/b/ The use of Lot D is governed by a 1999 stipulation which identifies its use for temporary overflow parking and the Authority has used it to store valet cars that are in excess of the on-Airport capacity.

parking spaces would be to the northbound portion of the Terminal Loop Roadway. In addition, it is assumed that a rental car center would be developed on approximately six acres on the southeastern portion of the A-1 North Property. The new allocation of parking spaces among all the available locations controlled by the Authority is shown in Table 3.

As a result of the acquisition of the A-1 North Property, the Authority would be able to provide covered short-term public parking in the Short-Term Lot and the Valet East Lot. Some of the canopies that currently exist on the A-1 North Property would be relocated to the Short-Term Lot and Valet East Lot.

For rental car parking, this project component would include 500 ready/return spaces in the rental car center on the A-1 North Property (see Figure 4). This would represent an increase of 200 ready/return spaces over the number of spaces in the existing Terminal South Lot (Ready Rental Lot) at the Airport. It is contemplated that some existing off-Airport rental car facilities would relocate to the new facility on the A-1 North Property. No changes would occur at the on-Airport rental car maintenance facility in the southwest quadrant of the Airport.

TABLE 3: CHANGES IN PASSENGER AND EMPLOYEE PARKING AS A RESULT OF THE PROPOSED PROJECT

	Public Short-Term	Public Long-Term	Premium Self Park	Valet	Employee	TOTAL
A-1 Lot	0	1114	0	1826	0	2940
Employee Lot /a/	0	0	0	0	385	385
Lot A /a/	0	0	0	0	0	0
Lot B	0	0	0	0	0	0
Lot C	0	0	0	0	0	0
Lot D /b/	0	0	0	-1265	0	-1265
Short-Term Structure / Lot	170	0	0	0	0	170
Car Wash	0	0	0	-69	50	-19
Terminal South Lot	0	0	297	0	0	297
Valet East Lot	0	0	0	-197	0	-197
Valet South Lot	0	0	0	46	0	46
BUR TOTAL	170	1114	297	341	435	2357
A-1 NORTH (PRIVATE DEVELOPER) TOTAL	0	-2176	0	0	0	-2176
OVERALL TOTAL	170	-1062	297	341	435	181

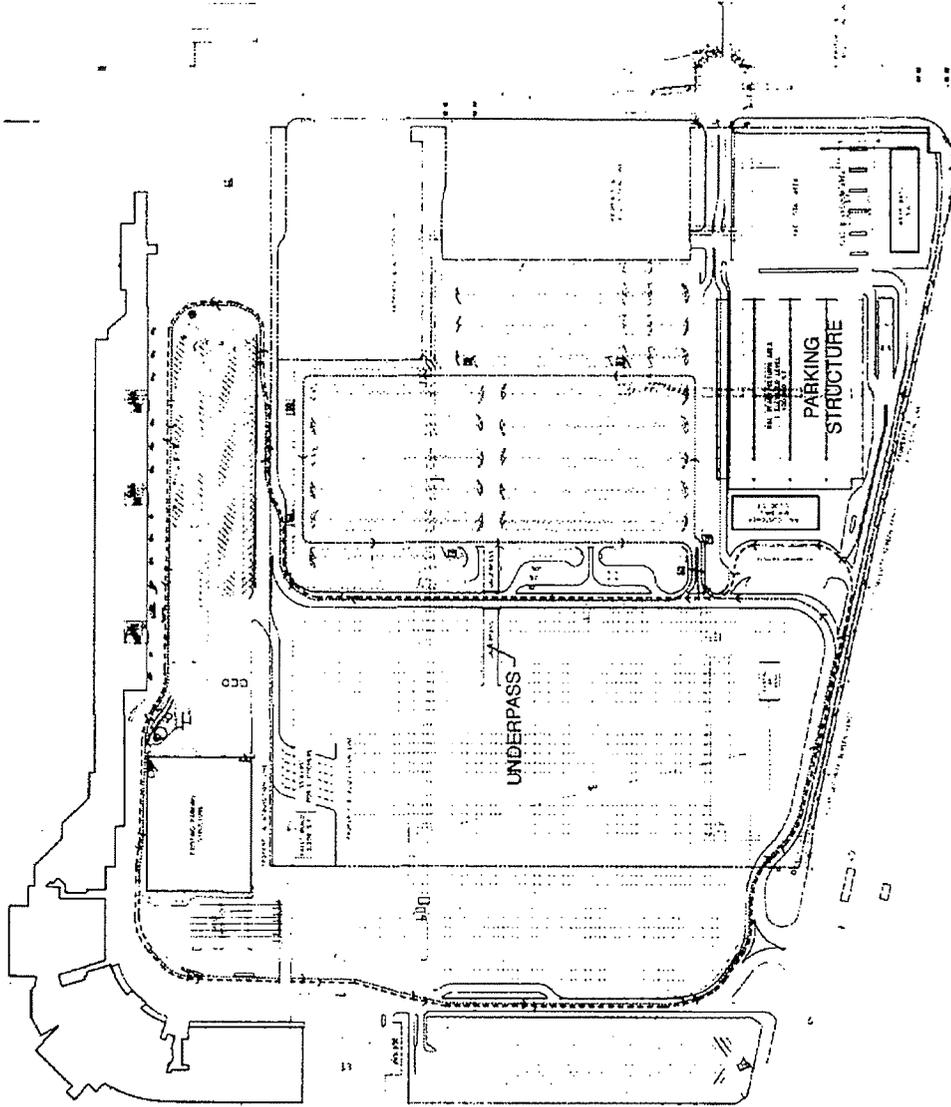
Source: Burbank-Glendale-Pasadena Airport Authority

/a/ The Employee Parking Lot and a portion of Lot A are used for temporary overflow parking as has been historically permitted.

/b/ The use of Lot D is governed by a 1999 stipulation which identifies its use for temporary overflow parking and the Authority has used it to store valet cars that are in excess of the on-Airport capacity.

The development of a rental car center on the A-1 North Property would enable the Authority to reconfigure the Terminal South Lot for self-parking (see Figure 4).

The proposed A-1 North Property Acquisition project component would include the development of several improvements to increase the efficiency of both the valet parking facility and the rental car center. These improvements include the relocation of a portion of the Terminal Loop Roadway in order to provide access to the self-parking portion of the lot and rental car facility, construction of a valet parking plaza and building, an underpass beneath the realigned Terminal Loop Roadway, a rental car center customer building, entrance driveways for the rental car center, a rental car center parking structure (one elevated level), and a rental car center quick turn around facility (see Figure 5).



Development Agreement and Related Actions / 204014 ■
Figure 5
 Conceptual Configuration of Parking at
 Terminal Area and A-1 North Property

SOURCE: Burbank-Glendale-Pasadena Airport Authority

REALIGNMENT OF TERMINAL LOOP ROADWAY

The alignment of the Terminal Loop Roadway would change between its intersection with Empire Avenue and its intersection with Hollywood Way (see Figure 3). This proposed alignment would result in the Terminal Loop Roadway heading east (instead of the existing northern direction) from its intersection with Empire Avenue and being north of and parallel to Empire Avenue. The realigned Terminal Loop Roadway would be aligned south of the existing car wash facility on the A-1 North Property. East of the existing car wash facility, the Terminal Loop Roadway would turn to a northerly direction and bisect the A-1 North Property. At the northern boundary of the existing A-1 North Property, the Terminal Loop Roadway would turn to the east and be within the existing alignment of the Terminal Loop Roadway as it approaches Hollywood Way. As part of this project component, the Authority would construct an underpass beneath the realigned roadway to allow integrated parking operations on both sides of the realigned Terminal Loop Roadway without having an at-grade intersection.

VALET PARKING PLAZA AND BUILDING

To accommodate the valet parking operation, the Authority would demolish and replace its existing porte cocheres with a larger porte cochere over the drop-off lanes, demolish its existing valet parking booth, construct a new valet parking plaza and a new valet building with a new porte cochere over the new pick-up lanes, construct a new covered sidewalk east of the existing parking structure to permit valet passengers to safely access the valet building, relocate to the south the existing east-west crosswalk that currently connects Terminal B with the existing valet booth, and incorporate additional ADA-accessible elevators for the existing parking structure to supplement the existing non-ADA accessible elevator currently in service. These new facilities would be immediately east and south of the existing valet parking building and would provide a place for valet parking patrons to pay for parking and to wait for their vehicle to be retrieved and delivered to them. The valet parking plaza would include an exit lane for valet parking patrons that would merge with the eastbound portion of the Terminal Loop Roadway. The valet building would be a one-story structure of approximately 3,200 square feet.

RENTAL CAR CENTER CUSTOMER BUILDING

The rental car center on the A-1 North Property would include a customer building that would house rental car company counters, offices, and restrooms for rental car customers (see Figure 5). The customer building, which would be one story and have approximately 10,200 square feet, would provide space for a number of separate rental car companies (approximately six). This would enable an increase in the number of on-Airport rental car companies. Transportation between the rental car center customer building and the passenger terminal would be exclusively via shuttle buses.

With the construction of a rental car center customer building on the A-1 North Property, the rental car customer counters in the terminal building would be removed and replaced by additional baggage claim facilities for passengers arriving in Terminal B. The footprint of the Terminal building would not be increased.

RENTAL CAR CENTER ENTRANCE DRIVEWAYS

Access to the rental car center would be via a driveway from the realigned Terminal Loop Roadway (see Figure 5). This driveway would be for the use of shuttle buses that provide access to the rental car center for rental car customers. The driveway would be at the western end of the rental car center and would provide drop-off and pick-up services at the rental car center customer building. This driveway would also be used for off-Airport rental car shuttle buses that would bring their customers to the rental car center and could also be used (although it is not currently foreseen) for transit vehicles that would bring transit passengers to the Airport, for subsequent transfer to the Airport-operated shuttle bus. Only Airport-operated shuttle buses would be permitted to pick up and drop off passengers at the airline terminal building. This driveway also would be used by rental car customers for exiting the rental car center and for returning rental cars and by rental car companies for returning vehicles to the rental car center that have undergone servicing that cannot be accomplished at the rental car center (see discussion of the quick turn around facility, below). Upon exiting the rental car center, rental car customers would have the option of merging into the northbound portion of the Terminal Loop Roadway or accessing an exit driveway to the Hollywood Way / Avon Street intersection.

RENTAL CAR CENTER PARKING STRUCTURE

To accommodate the rental car operations, the Authority may construct a parking structure (one elevated level) on a portion of the A-1 North Property (see Figure 5). This parking structure would accommodate a portion of the 500 rental car spaces planned for the A-1 North Property; however, the total number of ready return spaces that would be provided in the rental car facility through use of at-grade and structured parking is 500 spaces. Access to the parking structure, which may have up to one level above the ground level, would be via a ramp near the rental car center customer building.

RENTAL CAR CENTER QUICK TURN AROUND FACILITY

As part of the rental car center, a quick turn around (QTA) facility would be constructed (see Figure 5). This facility would provide a location on the A-1 North Property for rental cars that have been returned to be stored and subsequently washed and fueled and made ready for the next rental car customer. This facility would include a 9,500-square-foot building that has office space and wash racks. In addition, the QTA would have an approximately 10,000-square-foot space for fueling and vacuuming the rental cars. This space would have a roof but would not have walls. Each of the on-Airport rental car companies would share these facilities at the rental car center.

REALIGNMENT OF TERMINAL LOOP ROADWAY AT THE HOLLYWOOD WAY / THORNTON AVENUE INTERSECTION PROJECT

As part of the proposed Project, the City, with a financial contribution from the Authority plans to realign the intersection of Hollywood Way / Thornton Avenue / Terminal Loop Roadway. To accomplish this realignment, either the City or the Authority would acquire approximately 10,500 square feet (0.24 acres) of the northeastern portion of the A-1 North Property. This project component would result in a safer movement of traffic through the intersection. The eastbound Terminal Loop Roadway approach to the intersection would be widened and the lanes would be shifted to the south. The shifting of the lanes to the south would result in an improved alignment with the westbound traffic on Thornton Avenue.

Currently, traffic approaching the intersection westbound on Thornton Avenue is imperfectly aligned with traffic approaching the intersection eastbound on the Terminal Loop Roadway. This imperfect alignment results in drivers having to “jog” to the right when traversing the intersection. The proposed improvements to this intersection would result in an improved alignment of westbound and eastbound approaching traffic.

RELOCATION OF PARKING LOT A PROJECT

This project component would require the relocation of the existing Lot A to the north onto the Adjacent Property. Portions of the existing Lot A are currently located within the Runway Object Free Area, as defined in FAA Advisory Circular 150/5300-13, and are also located within the “primary surface” of an instrument runway, as defined in Federal Aviation Regulations Part 77 (“Part 77”). Thus, the existing location of Lot A does not conform to the runway separation standards presented in the Advisory Circular and Federal Aviation Regulations. The relocation of Lot A would result in this parking lot conforming with the runway separation standards presented in the Advisory Circular as well as removal of an existing parking lot from within the Part 77 primary surface. The number of public parking spaces in Lot A would not change as a result of this project component (see Table 3). As part of the relocation of Lot A, the Authority would provide the FAA-required 75-foot separation between parking lots and the air traffic control tower building, for the purpose of enhancing the security of this critical facility. The proposed Project would include permanent use of the portion of the current Lot A that is used for temporary overflow public and employee parking as has been historically permitted.

COMPLETION OF TAXIWAY D PROJECT

This project component would result in the relocation of a portion of the Airport perimeter roadway to the north and the completion of Taxiway D, which is parallel to and north of Runway 8/26, east of its intersection with Runway 15/33 (see Figure 2). The 1,650-foot long section of taxiway would result in a safer and more efficient operation of the airfield at the Airport. For a discussion of the operational effects of completing Taxiway D, see Appendix A.

OTHER PROJECT ELEMENTS AND APPROVALS

The development agreement would contain a number of provisions other than those concerning the construction of facilities and permitted uses discussed above.

ADOPTION OF PART 77 STANDARDS

Part 77 establishes height limit standards and procedures for compliance with these standards. The proposed development agreement contemplates that the City would concurrently consider the adoption of an ordinance that would make the Part 77 guidelines applicable within the City. The City would revise its Municipal Code to require that the sponsors of proposed construction projects near the Airport seek Federal Aviation Administration review and determination of no hazard before building permits can be issued. This review is already required by existing Federal law; the intent of the action by the City would provide local notifications under this already required process. Implementation of this process would help ensure that only projects that are not hazards to navigation would be built near the Airport.

NOISE INSULATION ORDINANCE

The proposed development agreement contemplates that the City would concurrently adopt a revised Municipal Code provision applicable to new single-family homes located within the 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour. This provision would require the builders of new residential structures to provide sufficient acoustical treatment to ensure that interior noise would not exceed a 45 dB CNEL noise level.

PROJECTS NOT TO BE APPROVED OR CONSTRUCTED

Under the terms of the proposed development agreement, the Authority's ability to construct uses permitted by the current Airport zoning ("APZ") would vest for the seven-year term of the agreement. However, the development agreement would commit the Authority not to seek approval for or to construct, or to permit others to construct, the following six types of projects for the term of the development agreement, regardless of whether such projects would otherwise be allowed under the APZ zone:

- new or relocated air passenger terminal building;
- expansion of the existing Airport terminal building footprint;
- additional aircraft parking positions at the existing terminal;
- new remote aircraft parking positions;
- increase in the gross square footage of property at the Airport devoted to general aviation (GA) uses; and
- new buildings within the existing Building Restriction Line (BRL), except for buildings located on the landside (southerly and ~~westerly~~) of the existing passenger terminal and the relocation of Parking Lot A discussed above. *EXISTING*

In addition to these six types of projects, the uses on the "Trust Property" would continue to be limited. In addition to the current limitations, the Authority would discontinue use of the overflow valet parking facility on the B-6 Trust Property. The Authority would not construct any public vehicle parking facility in the southwest quadrant of the Airport for four years after completion of the A-1 North Property Acquisition project component. The development agreement contemplates that the Trust Property could be used for non-airport development consistent with existing zoning.

ENVIRONMENTAL IMPACTS

Issues (and Supporting Information Sources):	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
I. AESTHETICS -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) The Bob Hope Airport and the surrounding region are located within a developed urban commercial and industrial area. The aesthetic character of the area is largely utilitarian. The area is dominated by commercial, industrial and manufacturing structures, chain link and concrete fencing and barriers, and concrete or asphalt paved roads and surfaces. The San Gabriel Mountains serve as a backdrop to the urban setting. Airport and Airport-adjacent structures are low-rise – generally up to two stories per building – and do not affect any current views of the mountains that might be available in the area. The buildings and structures proposed as part of the Project, including the valet parking plaza and building, the rental car center customer building, the rental car center parking structure (one elevated level), and the rental car center quick turn around facility, would not interfere with any scenic vista. In addition, none of the other project components, such as the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, the relocation of Lot A, and the completion of Taxiway D, would interfere with any scenic vista. Similarly, the adoption of Part 77 standards and the height limitations ordinance by the City of Burbank would not interfere with any scenic vista. Therefore, the Project would have no impact on any scenic vista.				
b) The Airport is not within close proximity to scenic resources, including native trees, rock outcroppings, historic buildings, or a state scenic highway. Therefore, the proposed Project would have no impact on these resources.				

- c) The proposed Project would result in the use of the A-1 North Property for valet, long-term, and rental car parking, the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, the relocation of Lot A, and the completion of Taxiway D. These uses and facilities would not be incompatible with surrounding development and would not substantially degrade the existing visual character or quality of the Airport and its surroundings because these uses and facilities are only minor alterations to the existing or adjacent uses and facilities. Similarly, the adoption of Part 77 standards and the height limitations ordinance by the City of Burbank would further ensure that future development in the City of Burbank would be of similar scale to existing development in the Airport vicinity. Therefore, the proposed Project would have no impact on the existing visual character.
- d) The existing parking lot on the A-1 North Property and the existing Lot A have lighting standards and are illuminated at night for security purposes. The proposed Project would continue to have lighting standards in parking lots. In addition, the City's adoption of the Part 77 standards would result in ensuring that only projects that are not hazards to navigation would be built near the Airport. Thus, no new sources of light or glare would be permitted as a result of the City's adoption of the Part 77 standards. Therefore, no new sources of lighting would occur as a result of the proposed Project.

Issues (and Supporting Information Sources):	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

II. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. **Would the project:**

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

154

a,b,c) The Airport and the surrounding region are located within a developed urban commercial and industrial area. No agricultural resources exist in the vicinity of the Airport. The proposed Project does not include the addition of structures, fixtures or improvements that would reduce or eliminate agricultural resources. Therefore, implementation of the proposed Project would not affect agricultural resources.

Issues (and Supporting Information Sources):

	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a,b) The proposed Project would not conflict with or obstruct implementation of any air quality plans, nor would it violate any air quality standards. The proposed Project would result in a decrease of 254 public parking spaces at the Airport and an increase of 435 employee parking spaces (consisting of 385 new employee parking spaces, and the conversion of the 69 existing Car Wash valet parking spaces to 50 employee parking spaces). The number of vehicle trips to and from the Airport would not be affected because the Project does not add any additional public parking spaces to the current inventory of public parking spaces that are available for passenger use, but instead reduces the number of public parking spaces by 254. The change in air pollutant emissions as a result of the proposed Project would be because the location of various parking facilities at the Airport would change. Of the various components of the proposed Project, the only components that would lead to any change in the location of parking would be the development of valet parking on the A-1 North Property and the development of the rental car center on the A-1 North Property.

Except for the completion of Taxiway D, all other components of the proposed Project would have air pollutant emissions that are similar to existing conditions.

The adoption of Part 77 standards and the height limitations ordinance as well as the adoption of the noise insulation ordinance by the City of Burbank would not result in any changes to the number of vehicle miles traveled or in air pollutant emissions in the Airport vicinity and other areas in the City that are affected by the ordinance.

Change in Air Pollutant Emissions Due to Change in Location of Valet Parking. As a result of consolidating valet parking in one location at the Airport (the existing Valet South Lot and the A-1 Lot), the total number of vehicle miles traveled would be reduced. Implementation of this project component would eliminate the need to shuttle vehicles dropped off for valet parking to the B-6 Trust Property for storage. Instead, vehicles dropped off for valet parking would be parked on the A-1 North Property as a result of this project component. For every vehicle that is parked with valet parking, this would result in a reduction of approximately 1 vehicle mile traveled (VMT). Over the course of a year, this would result in the reduction of approximately 221,200 VMT compared to existing conditions (see Table 4). In terms of air pollutant emissions, this project component would result in the reduction of 0.63 pounds per day of nitrogen oxide (NO_x), the reduction of 0.49 pounds per day of hydrocarbons (HC), the reduction of 8.27 pounds per day of carbon monoxide (CO), and the reduction of 9.81 pounds per day of particulate matter.

Change in Air Pollutant Emissions Due to Change in Location of Rental Car Center. The development of a rental car center also would result in a reduction in VMT at the Airport. Currently, rental cars are shuttled to the southwest quadrant of the Airport after every rental return to fuel and service the vehicle. Once rental cars are fueled and serviced, these rental cars are either returned to the Terminal South Lot for the next rental customer or shuttled to the B-6 Trust Property for storage until the rental car is needed. Upon completion of the rental car center on the A-1 North Property, rental cars would be fueled and serviced at the Quick Turn Around (QTA) facility that would be constructed as part of the rental car center. This would reduce the need to shuttle rental cars to the southwest quadrant of the Airport or to the B-6 Trust Property. Only rental cars that require maintenance other than fueling and servicing would be shuttled to the southwest quadrant of the Airport. For every returned rental car, the presence of the QTA would result in a reduction of approximately 0.75 VMT (compared to the existing condition for those rental cars that are currently returned directly to the Terminal South Lot) and a reduction of approximately 2.6 VMT (compared to the existing condition for those rental cars that are stored on the B-6 Trust Property). Over the course of a year, this would result in the reduction of approximately 215,600 VMT compared to existing conditions (see Table 4). In terms of air pollutant emissions, this project component would result in the reduction of 0.61 pounds per day of NO_x, the reduction of 0.47 pounds per day of HC, the reduction of 8.04 pounds per day of CO, and the reduction of 9.56 pounds per day of particulate matter.

The development of a rental car center on the A-1 North Property would result in the use of shuttle buses to provide passengers transport between the terminal building and the rental car center. For purposes of presenting the worst-case analysis, it was assumed that these shuttle buses would be 40-foot diesel buses and that the buses would operate every six minutes between the terminal and

TABLE 4: CHANGES IN AIR POLLUTANT EMISSIONS AS A RESULT OF THE PROPOSED PROJECT

Existing Conditions (2004)

Valet Cars		Daily			Emissions (grams/mile)				Emissions (lbs/day)			
From	To	Distance (miles)	Volume	Vehicle Miles	NOX	HC	CO	PM10	NOX	HC	CO	PM10
Valet Drop Off	B6 Trust Prop Lot	0.63	600	378.00	0.462	0.358	6.072	7.339	0.39	0.30	5.06	6.12
B6 Trust Prop Lot	Valet Pick Up	0.58	600	348.00	0.462	0.358	6.072	7.339	0.35	0.27	4.66	5.63
Total Daily Vehicle Miles Traveled by Valet Cars				726.00					0.74	0.57	9.72	11.75
Annual Vehicle Miles Traveled by Valet Cars				284,990								

Rental Cars		Daily			Emissions (grams/mile)				Emissions (lbs/day)			
From	To	Distance (miles)	Volume	Vehicle Miles	NOX	HC	CO	PM10	NOX	HC	CO	PM10
Terminal S Lot	SW Quadrant	0.43	500	215.00	0.462	0.358	6.072	7.339	0.22	0.17	2.88	3.48
SW Quadrant	Terminal S Lot	0.43	500	215.00	0.462	0.358	6.072	7.339	0.22	0.17	2.88	3.48
SW Quadrant	B6 Trust Prop Lot	1.52	100	152.00	0.462	0.358	6.072	7.339	0.15	0.12	2.03	2.48
B6 Trust Prop Lot	Terminal S Lot	1.08	100	108.30	0.462	0.358	6.072	7.339	0.11	0.09	1.45	1.75
Total Daily Vehicle Miles Traveled by Rental Cars				690.30					0.70	0.54	9.24	11.17
Annual Vehicle Miles Traveled by Rental Cars				251,960								

Existing Conditions (2004) Total				Emissions (lbs/day)			
NOX	HC	CO	PM10	NOX	HC	CO	PM10
1.4	1.1	19.0	22.9				

Proposed Project

Valet Cars		Daily			Emissions (grams/mile)				Emissions (lbs/day)			
From	To	Distance (miles)	Volume	Vehicle Miles	NOX	HC	CO	PM10	NOX	HC	CO	PM10
Valet Drop Off	A-1 Lot	0.10	600	60.00	0.411	0.311	5.482	7.339	0.05	0.04	0.73	0.97
A-1 Lot	Valet Pick Up	0.10	600	60.00	0.411	0.311	5.482	7.339	0.05	0.04	0.73	0.97
Total Daily Vehicle Miles Traveled by Valet Cars				120.00					0.11	0.08	1.45	1.94
Annual Vehicle Miles Traveled by Valet Cars												

Rental Cars		Daily			Emissions (grams/mile)				Emissions (lbs/day)			
From	To	Distance (miles)	Volume	Vehicle Miles	NOX	HC	CO	PM10	NOX	HC	CO	PM10
A-1 Lot	OTA	0.05	450	22.50	0.411	0.311	5.482	7.339	0.02	0.02	0.27	0.36
OTA	A-1 Lot	0.05	450	22.50	0.411	0.311	5.482	7.339	0.02	0.02	0.27	0.36
A-1 Lot	SW Quadrant	0.61	50	30.50	0.411	0.311	5.482	7.339	0.03	0.02	0.37	0.49
SW Quadrant	A-1 Lot	0.48	50	24.00	0.411	0.311	5.482	7.339	0.02	0.02	0.29	0.39
Total Daily Vehicle Miles Traveled by Rental Cars				99.50					0.09	0.07	1.20	1.61
Annual Vehicle Miles Traveled by Rental Cars												

Shuttle Buses		Daily			Emissions (grams/mile)				Emissions (lbs/day)			
From	To	Distance (miles)	Volume	Vehicle Miles	NOX	HC	CO	PM10	NOX	HC	CO	PM10
A-1 Lot	Terminal	0.43	160	68.80	9.92	0.52	6.1	7.583	1.50	0.08	0.93	1.15
Terminal	A-1 Lot	0.27	160	43.20	9.92	0.52	6.1	7.583	0.94	0.05	0.58	0.72
Total Daily Vehicle Miles Traveled by Shuttle Buses				112.00					2.45	0.13	1.51	1.87
Annual Vehicle Miles Traveled by Shuttle Buses												

Proposed Project Emission Increase Is Above or Below Significance Criteria?				Emissions (lbs/day)			
NOX	HC	CO	PM10	NOX	HC	CO	PM10
Below	Below	Below	Below	2.6	0.3	4.2	5.42

Proposed Project Emission Increase Is Above or Below Significance Criteria?				Emissions (lbs/day)			
NOX	HC	CO	PM10	NOX	HC	CO	PM10
Below	Below	Below	Below	1.2	-0.8	-14.8	-17.49
55.0	55.0	550.0	150.0				

Assumptions:

Existing Conditions

Of the 1,000 valet transactions per day, approximately 80% of the valet vehicles currently are shuttled to the B-6 Trust Property (600 trips to the B-6 Trust Property and 600 trips from the B-6 Trust Property). These 1,000 valet transactions per day are

Of the 1,000 rental car transactions per day, all vehicles are shuttled to the Southwest Quadrant for servicing. Approximately 20% of all rental cars are stored on the B-6 Trust Property on a daily basis.

With Proposed Project

Of the 1,000 valet transactions per day, all valet vehicles will remain at the A-1 North Property and no shuttling of valet vehicles to the B-6 Trust Property will occur.

Of the 1,000 rental car transactions per day, 90% would be serviced at the QTA on the A-1 North Property and 10% would require servicing on the Southwest Quadrant.

The rental car center shuttle bus would operate every six minutes (10 times per hour) and operate for approximately 16 hours per day.

Emission Factors for Valet and Rental Cars:

- PM10 emission factors include PM10 from exhaust, brake wear, tire wear and entrained road dust.
- Emission factors, except entrained road dust, were derived from ARB's EMFAC2002 Model (V 2.2).
Entrained road dust factor based on the U.S. EPA factor for paved roads found in AP-42 (December 2003).
- HC and NOx factors reflect summertime conditions, while CO factors reflect wintertime conditions. PM10 factors are the same for both seasons.
- Summertime temperatures assumed to be 85 degrees Fahrenheit; wintertime temperatures reflect 60 degrees Fahrenheit. Assumes 50% relative humidity for both seasons.
- The average vehicle speed was assumed to be 20 mph.
- All other EMFAC2002 model inputs were based on default values.

Emission Factors for Shuttle Buses:

- PM10 emission factors include PM10 from exhaust, brake wear, tire wear and entrained road dust.
- Source of factors to convert Diesel Shuttle Bus Emission Factors to Hybrid Electric: Hybrid-Electric Drive Heavy-Duty Vehicle Test Project Northeast Advanced Vehicle Consortium, M.J. Bradley and Associates, West Virginia University, February 15, 2000.
Entrained road dust factor based on U.S. EPA factor for paved roads found in AP-42 (December 2003).
PM10 brake wear and tire wear factors derived from ARB's EMFAC2002 Model (V2.2).

157

the rental car center. These shuttle buses would travel along with Terminal Loop Roadway and would result in an annual increase of approximately 40,900 VMT (see Table 4). In terms of air pollutant emissions, this project component would result in an increase of 2.45 pounds per day of NO_x, an increase of 0.13 pounds per day of hydrocarbons (HC), an increase of 1.51 pounds per day of CO, and an increase of 1.87 pounds per day of particulate matter. It is acknowledged the this slight increase in air pollutant emissions as a result of the shuttle bus operation would be offset by a reduction in shuttle bus trips associated with off-Airport rental car operations moved to the proposed rental car center on the A-1 North Property. However, it is too speculative to calculate the benefit of this reduction in shuttle bus operations to off-Airport rental car operations because it is not possible to identify which off-Airport rental car operators would move into the proposed rental car center on the A-1 North Property.

Summary of Change in Air Pollutant Emissions Due to Change in Location of Parking. Overall, the proposed Project would result in an increase of 1.2 pounds per day of NO_x, which is substantially below the 55 pounds per day significance threshold established by the South Coast Air Quality Management District (SCAQMD), a decrease of 0.8 pounds per day of HC, a decrease of 14.8 pounds per day of CO, and a decrease of 17.5 pounds per day of particulate matter (see Table 4). If the rental car center shuttle buses were hybrid electric instead of diesel, the increase in NO_x would be less and the decrease in HC, CO, and particulate matter would be greater than that identified using diesel buses.

Change in Air Pollutant Emissions Due to Completion of Taxiway D. The completion of Taxiway D would result in a more efficient use of the airfield (see Appendix A), which would reduce the taxi idle time for aircraft operated at the Airport. This reduction in taxi idle time would have corresponding reductions in air pollution emissions from aircraft.

Summary of Change in Air Pollutant Emissions Due to Proposed Project. In totality, the reduction in VMT for valet cars and rental cars as well as the reduction in taxi idle time for aircraft would result in a decrease in air pollutant emissions at the Airport. This is slightly offset by the inclusion of shuttle bus service for the rental car center. The overall air pollutant emissions of the proposed Project would be less than significant because the emissions do not exceed the significance thresholds set by the SCAQMD.

Construction-Related Air Pollutant Emissions. The construction phase of the project would result in temporary increases in criteria emissions. In terms of NO_x, HC, and CO, this temporary increase is associated with equipment used for the construction of the buildings, structures, and facilities associated with the A-1 North Property, with equipment used in realigning Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, with equipment used in relocating Lot A, and with equipment used in completing Taxiway D. Based on experience with similar construction and paving projects, given the relatively small size of the buildings to be constructed on the A-1 North Property (the valet parking plaza and building, the rental car center customer building, and the rental car center QTA), the duration of construction, and the types of equipment to be used, the use of this equipment would not result in a significant temporary increase in NO_x, HC, or CO emissions. Similarly, the number of pieces of equipment being used for the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue

intersection, the relocation of Lot A, and the completion of Taxiway D and the relatively short duration for construction would not result in a significant temporary increase in NO_x, HC, or CO emissions. Also, the construction on the A-1 North Property would not overlap with the construction associated with the relocation of Lot A or the completion of Taxiway D. This would minimize any cumulative construction-related air pollutant emissions for the various components of the proposed Project. The Authority would be required to comply with rules promulgated by the SCAQMD to minimize impacts associated with asphalt paving and architectural coating. In addition, the Authority would require contractors to implement standard Best Management Practices to mitigate any short-term air quality impacts associated with the use of construction equipment (see Mitigation Measure #1 in Section XVII).

In terms of particulate matter, the greatest contributors to a temporary increase in particulate matter are associated with excavation and grading operations. Large diameter dust particles (i.e., greater than 30 microns) generally fall out of the atmosphere within several hundred feet of a construction site and represent more of a soiling concern than a health hazard. Smaller diameter particles (e.g., less than 10 microns or 2.5 microns) generally remain airborne until removed from the atmosphere by moisture. This is the particulate matter that may result in adverse health effects. Construction activities may result in significant quantities of dust, and, as a result, local visibility and particulate matter concentrations may be adversely affected on a temporary and intermittent basis during the construction period. However, the amount of dust that could be generated by construction is tempered by the fact that the area subject to excavation and/or grading is about seven acres. The Authority would be required to comply with Rule 403 adopted by the SCAQMD. The provisions of Rule 403 apply to any activity or man-made condition capable of generating fugitive dust, such as the excavation and grading activities associated with various components of the proposed Project. The required implementation of Rule 403 would reduce potential construction dust concerns to a less-than-significant level. Therefore, the proposed Project would have no impact in terms of obstruction of implementation of the applicable air quality plan and substantial contribution to an existing or projected air quality violation.

- c,d,e) Because the proposed Project would result in a decrease in HC, CO, and PM₁₀ and a negligible increase in NO_x, the proposed Project would not result in any cumulatively considerable net increase of any criteria pollutant. The proposed Project would not induce or accommodate additional traffic and would reduce HC, CO, and PM₁₀ emissions by reducing the number of vehicle miles traveled in the Airport vicinity. The increase in NO_x emissions attributable to the rental car center shuttle bus service would be negligible. Further, any exposure of sensitive receptors to pollutant concentrations and/or any objectionable odors would be solely linked to construction equipment, would be temporary, and would not be substantial. There are no sensitive receptors near any proposed construction activity. The SCAQMD thresholds are set at a level that defines a cumulatively considerable impact to the regionwide air quality. These air quality impacts would be temporary, less than significant, and substantially below the SCAQMD thresholds.

Issues (and Supporting Information Sources):

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---	--	---	----------------------

IV. BIOLOGICAL RESOURCES – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a) No candidate, sensitive, or special status species is known to exist or occur in the vicinity of the Airport. The potential for occurrence of such species in the area is low due to the urban condition of the Airport and surrounding area. Therefore, the proposed Project is expected to have no impact on any special-status species. | | | | |
| b) No adverse effect on any riparian habitat or other sensitive natural community would occur as a result of the proposed Project. Due to the lack of a riparian zone on or near the Airport, this would constitute no impact. | | | | |

- c) No adverse effect on federally-protected wetlands (as defined by Section 404 of the Clean Water Act) would occur because all of the development that could occur under the proposed Project would be on relatively flat land areas that have been previously developed. No suitable wetland habitat is on or near the Airport. Therefore, there would be no impact on wetlands.
- d) The A-1 North Property would be dedicated to roadway and parking uses, which are Airport-related uses. The relocation of Lot A would occur on a portion of the existing Airport and on a portion of the Adjacent Property. The completion of Taxiway D would occur on existing Airport property. None of these areas provide natural or effective sources of habitat, feeding, linkage, or migration paths for animal life. Given the developed nature of the existing Airport, the A-1 North Property, and the Adjacent Property, it is unlikely that any of these properties would be used for the movement of native resident or migratory wildlife species or as a native wildlife nursery site. The adoption of Part 77 standards and the height limitations ordinance as well as the adoption of the noise insulation ordinance by the City of Burbank would have no effect on biological resources because no specific development would occur as a result of the adoption of these ordinances. Therefore, the proposed Project would have no impact on the movement of native or migratory wildlife.
- e,f) There are no biological resources at the Airport that are protected by local policy or ordinance or by adopted conservation plans. The existing Airport, the A-1 North Property, and the Adjacent Property do not provide natural or effective sources of habitat, feeding, linkage, or migration paths for animal life, and are not suitable sites for Habitat Conservation Plans, Natural Community Conservation Plans, or other conservation plans. In addition, the adoption of Part 77 standards and the height limitations ordinance as well as the adoption of the noise insulation ordinance by the City of Burbank would not have any affect on existing conservation planning efforts. Therefore, the proposed Project would have no impact in terms of conflict with any local policies or ordinances protecting biological resources.

Issues (and Supporting Information Sources):	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

V. CULTURAL RESOURCES – Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a,b,c,d) The proposed Project would result in the use of the A-1 North Property, the existing Airport, and the Adjacent Property for parking, roadway, and airfield uses. All of these areas have been disturbed at the surface level through grading and/or paving.

The proposed Project would include the construction of several buildings and structures on the A-1 North Property, the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, the completion of Taxiway D, and the relocation of Lot A. These actions could result in the removal of some of the existing pavement at the A-1 North Property, the existing Airport, and the Adjacent Property. Since only surface pavement would be removed under these components of the proposed Project, this would not result in the discovery of previously unknown subsurface historic, prehistoric, or paleontological resources. In addition, the adoption of Part 77 standards and the height limitations ordinance as well as the adoption of the noise insulation ordinance by the City of Burbank would not result in any grading or subsurface excavation. Therefore, the adoption of these ordinances would not have any affect on subsurface historic, prehistoric, or paleontological resources. This would result in no impact to cultural resources.

Excavation would be required for the construction of underground fuel tanks associated with the QTA on the rental car center and the underpass beneath the realigned Terminal Loop Roadway on the A-1 North Property. The excavation associated with these components of the proposed Project could result in the discovery of previously unknown subsurface historic, prehistoric, or paleontological resources. Pursuant to CEQA Guidelines section 15064.5(f), the Authority would implement Mitigation Measure #2 (see Section XVII) to reduce this impact to a less-than-significant level.

A portion of the A-1 North Property was developed as a surface parking facility in 2002. Therefore, this property does not have any historic value associated with it and the use of the A-1 North Property for valet, long-term public, and rental car parking would not result in any impacts to historic resources. Similarly, no historic resources are associated with the area where the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, the completion of Taxiway D, or the relocation of Lot A would occur. The adoption of Part 77 standards and the height limitations ordinance as well as the adoption of the noise insulation ordinance by the City of Burbank would not have any direct effect on any known historic resources in the Airport vicinity. Therefore, no impacts to historic resources would occur as a result of these components of the proposed Project.

Issues (and Supporting Information Sources):	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

VI. GEOLOGY AND SOILS – Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

162

Issues (and Supporting Information Sources):

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---	--	---	----------------------

VI. GEOLOGY AND SOILS (cont.)

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a) Risk of injury or other upset as a result of the Airport's proximity to the nearest Alquist-Priolo zone would constitute a less-than-significant impact. The closest Alquist-Priolo zone is associated with the Verdugo Fault, which lies approximately one mile to the northeast of the Airport. According to the Probabilistic Seismic Hazard Assessment for the State of California published by the California Department of Conservation, Division of Mines and Geology and the U.S. Geological Survey, the Verdugo Fault has a maximum credible earthquake potential of 6.7 on the Richter Scale. | | | | |

Strong seismic ground shaking is unforeseeable and unpredictable. Surface parking lots and a taxiway are unlikely to expose people to risk of injury or collapse due to the nature of the

development itself. Further, the other buildings and structures, such as the rental car center customer building, the valet parking building, and the rental car parking structure (one elevated level), would be designed and constructed in conformance with the all applicable Uniform Building Code standards for Zone IV levels of seismic risk. With implementation of the measures required to meet these standards, significant impacts related to seismic ground shaking are not expected to occur as a result of the proposed project. This would constitute a less-than-significant impact.

According to the Department of Conservation, Division of Mines and Geology, Official Map of Seismic Hazards, the Airport is not located in an area of high risk relative to liquefaction or earthquake-induced landslides. Risk of injury or other upset as a result of the ground failure and/or liquefaction would not pose a significant impact. In addition, the buildings, structures, and facilities would be located on land that has been previously developed. The land involved is relatively flat and is not built on top of fill. Therefore, the risk of ground failure would be less than significant.

Due to the relatively flat topography of the Airport, and the distance from the base of foothills in the area, there is no potential for landslides. Therefore, the proposed Project would have no impact as a result of landslides.

- b) Most of the various components of the proposed Project would involve a small amount of surface grading to prepare the soil for construction of various buildings, structures, and facilities. The majority of the existing Airport, the A-1 North Property, and the Adjacent Property are level ground. Soil erosion or loss of topsoil is highly unlikely since the proposed Project involves areas that have been paved in the recent past. The only components of the proposed Project that would involve excavation would be the construction of the underground fuel tanks associated with the QTA at the rental car center on the A-1 North Property and the potential underpass beneath the realigned Terminal Loop Roadway on the A-1 North Property. These excavation activities could result in the erosion of soil. The Authority would be required to comply with all provisions of a National Pollution Discharge Elimination System (NPDES) permit, if applicable. In addition, the Authority would require contractors to implement Mitigation Measure #3 (see Section XVII) to control fugitive dust and erosion associated with excavation activities. Implementation of this mitigation measure would result in a less-than-significant impact in terms of soil erosion and loss of topsoil.
- c) As discussed above (see VI.a), the Airport is not located in an area that is subject to high liquefaction risks. The A-1 North Property and the Adjacent Property generally do not include sloping topography in excess of 5% slope, and therefore are not subject to significant landslide risks. The various components of the proposed Project are located on nearly level and highly-compacted soil that has been previously paved. Depth to groundwater in the vicinity of the Airport is approximately 200 feet below the surface. No modification of the underlying topography or geologic substructure of the existing Airport, the A-1 North Property, or the Adjacent Property is included as part of the proposed Project. The proposed Project is highly unlikely to create stability issues, and therefore would have no impact in terms of on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

- d) The various components of the proposed Project would not be located on expansive soil. Expansive soils are generally associated with alluvial soils characterized by streambed deposits. The various components of the proposed Project would take place on areas that have been previously paved over. In addition, riparian or streambed habitat is absent from the existing Airport, the A-1 North Property, and the Adjacent Property. The proposed Project would have no impact relative to expansive soils.
- e) None of the various components of the proposed Project would involve the installation of or use of septic tanks or alternative wastewater disposal systems. There would be no impact in terms of septic systems.

Issues (and Supporting Information Sources):	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

**VII. HAZARDS AND HAZARDOUS MATERIALS --
Would the project:**

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

165

Issues (and Supporting Information Sources):

	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

**VII. HAZARDS AND HAZARDOUS MATERIALS
(cont.)**

- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

a) Hazardous materials associated with the Terminal Loop Roadway, Lot A, and the airfield are associated with gasoline in vehicles and fuel for aircraft. The realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, the relocation of Lot A, and the completion of Taxiway D would not result in any changes in the use of vehicular gasoline or aircraft fuel and no creation of a significant hazard to the public involving the routine transport, use, or disposal of hazardous materials would occur. In addition, the development of the valet parking building and plaza, the rental car center customer building, and the rental car center parking structure would not create a significant hazard to the public involving the routine transport, use, or disposal of hazardous materials.

The development of the Quick Turn Around (QTA) facility for the rental car center on the A-1 North Property would result in the addition of one or more fuel tanks to serve the rental car companies that would use the QTA. Existing regulations and health and safety programs serve to control the storage and handling of hazardous materials at the Airport and the potential effects in the event of an accident. Airport tenants, such as rental car companies, are inspected periodically to ensure compliance with all applicable regulations. Additionally, consolidation of rental car facilities is likely as a result of the proposed rental car center on the A-1 North Property. This likely would reduce the overall number of fuel tanks in the Airport vicinity that are used to serve rental car companies. As a result, this is considered to be a less-than-significant impact.

b) The various components of the proposed Project would not pose a significant impact in terms of upset and accident conditions involving the release of hazardous materials. The surface grading involved with development on the A-1 North Property would be unlikely to unearth any hazardous materials, as the locations for the various facilities on the A-1 North Property have been recently graded and/or paved. The Lockheed Corporation has remediated the A-1 North Property to an acceptable level as determined by the Regional Water Quality Control Board. This has resulted in letters indicating that no further action is necessary. The remediation activities were accomplished contemplating future construction within the top ten feet of the property.

166

Implementation of the proposed Project would result in the continuation of a similar level of risk of exposure to hazards and hazardous materials, with regard to spills and explosions of fuels and other volatile liquids contained in parked vehicles, and from materials stored for use in maintenance of rental cars. Some rental car support facilities that involve hazardous materials (e.g., fueling and auto-washing stations) would be developed as part of the QTA at the rental car center on the A-1 North Property. This development would conform with current regulatory requirements that provide site improvements intended to mitigate the effects of spills. These functions currently exist at the Airport and the proposed Project would not result in any increase in the potential for spills to occur. Overall, the proposed Project would have a less-than-significant impact in terms of upset and accident conditions involving the release of hazardous materials.

The grading activities that would occur to accommodate the relocation of Lot A and the completion of Taxiway D are not anticipated to create a significant hazard to the public or the environment due to the release of hazardous materials into the environment because no such hazardous materials are known to exist at either location. Therefore, this is a less-than-significant impact. Nevertheless, it is possible that during construction activities contractors could notice contaminated soils or encounter soils that are indicative of contamination. If this occurs, Mitigation Measure #4 (see Section XVII) would be implemented.

- c) The Airport is not located within one-quarter mile of an existing or proposed school. Therefore, there would be no impact as a result of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- d) Various components of the proposed Project (such as the components on the A-1 North Property) are in areas that are on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, the A-1 North Property has been subject of hazardous materials remediation and no potential for creation of a significant hazard to the public or the environment would occur as a result of the implementation of any of the various components of the proposed Project. The development of underground fuel tanks for the rental car center and the underpass beneath the realigned Terminal Loop Roadway on the A-1 North Property likely would result in excavation of more than 10 feet deep on the A-1 North Property. Prior to commencement of excavations exceeding 10 feet in depth, the Authority would conduct focused investigations of the areas to be graded (see Mitigation Measure #4(a) in Section XVII). It is possible that during construction activities contractors could notice contaminated soils or encounter soils that are indicative of contamination. If this occurs, Mitigation Measure #4(b) (see Section XVII) would be implemented.

The portion of the Airport to be developed for the completion of Taxiway D and the portion of the Adjacent Property to be developed for the relocation of Lot A are not on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impact would occur in this regard.

- e) Although the various components of the proposed Project are located within the vicinity of a public-use airport, the proposed Project would not adversely affect the safety of employees and residents in the area. As part of the relocation of Lot A project component, this parking lot would be moved further from the airfield at the Airport and would result in this parking lot conforming with the runway separation standards presented in the FAA Advisory Circular regarding runway object free areas. The adoption of Part 77 standards and the height limitations ordinance by the City of Burbank would help ensure that only projects that are not hazards to navigation would be built near the Airport. These components of the proposed Project would be considered safety enhancements. The uses on the A-1 North Property would not change as a result of the proposed Project. None of the buildings on the A-1 North Property would be within the Airport's building restriction line. Therefore, no safety impacts would occur as a result of the development of the A-1 North Property project component. Any potential health and safety impacts above and beyond those that currently exist would be temporary and would be those typically associated with construction activities, which are less than significant.
- f) There is no private airstrip in the vicinity of the Airport. Therefore, no safety hazard would occur.
- g) The various components of the proposed Project would occur on sites that are currently paved, graded, or otherwise developed. These various components of the proposed Project would not decrease the effectiveness of any emergency response plan in the Airport vicinity. Therefore, there would be no impact in this regard.
- h) The Airport is not in an area subject to wildland fires. Therefore, the proposed Project would not result in the exposure of people or structures to wildland fire risk.

Issues (and Supporting Information Sources):	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---	--	---	----------------------

**VIII. HYDROLOGY AND WATER QUALITY –
Would the project:**

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

168

Issues (and Supporting Information Sources):

VIII. HYDROLOGY AND WATER QUALITY (cont.)

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion of siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-yr. flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-yr. flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation of seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) The proposed Project would result in the use of the existing Airport, the A-1 North Property, and the Adjacent Property for various buildings, structures, and facilities. The proposed Project would result in the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection and the paving of an approximate 6-acre portion of the A-1 North Property for use as the rental car center, which would be considered a new impervious surface. However, when the Lockheed Corporation owned the property approximately 99.9% of the site was covered with impervious surfaces (rooftop of the building, pavement, etc.). The private developer of the existing long-term parking lot on the A-1 North Property previously received a permit from the City of Burbank Department of Public Works because, among other things, the site is tied into the City's				

storm drain system and the drainage infrastructure in the vicinity of the A-1 North Property is adequate to accommodate runoff from a fully paved site. The Authority estimates that approximately 96% of the A-1 North Property would be impervious surfaces upon completion of the various components of the proposed Project because landscaping would be included in the design of the various components. Therefore, the amount of impervious surfaces on the A-1 North Property would be less than the historical amount of impervious surfaces when the Lockheed Corporation owned and occupied the property. However, since paving for a rental car center would be classified as redevelopment, the Authority would comply with the Standard Urban Stormwater Mitigation Plan (SUSMP) for Los Angeles County and Cities in Los Angeles issued by the Regional Water Quality Control Board. Compliance with the SUSMP, which is required under the City's ordinance adopted under the National Pollution Discharge Elimination System (NPDES) permit, would ensure that the development of the various components on the A-1 North Property would not result in any impacts associated with stormwater drainage.

The existing Airport and Adjacent Property also are covered with impervious surfaces. However, the relocation of Lot A and the completion of Taxiway D also would be classified as redevelopment and would be required to comply with the SUSMP, which would ensure that these project components would not result in any impacts associated with stormwater drainage. Therefore, the proposed Project does not have any component that would negatively affect waste discharge requirements. Overall, the proposed Project would have no adverse impact on water quality standards or waste discharge requirements.

- b) The Airport and the entire Burbank region are underlain by the San Fernando Groundwater Basin that is part of the larger Upper Los Angeles River Drainage Basin. Groundwater recharge would not be adversely affected by the proposed Project in that the project would not increase the amount of impervious surfaces compared to what was historically at the Airport and on the A-1 North Property. Therefore, the project would have no adverse impact on groundwater supplies and/or groundwater recharge.
- c,d) The proposed Project would not substantially alter the existing drainage pattern of the Airport; therefore, no substantial erosion or off-site siltation would occur. The proposed Project would not alter the course of a river. The existing Airport and the Adjacent Property are covered with impervious surfaces and would continue to be covered upon the completion of Taxiway D and the relocation of Lot A. Any increase in the amount of runoff relative to existing conditions would be associated with the additional impervious surfaces associated with the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection and the development of the rental car on the A-1 North Property. However, these areas were previously developed and covered with impervious surfaces when it was owned by the Lockheed Corporation. It is anticipated that the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection and development of a rental car center on the A-1 North Property would not alter the historic drainage pattern. However, the Authority would be required to comply with the SUSMP to ensure that no impact on drainage patterns would occur and that there would be no impact from substantial erosion or off-site siltation or the amount of runoff at the Airport.

- e) The proposed Project would not increase any impervious surfaces associated with the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, the completion of Taxiway D, or the relocation of Lot A. Additionally, the proposed Project would not increase the amount of impervious surface over what was historically present at the A-1 North Property. Therefore, excessive runoff water and/or substantial polluted runoff would not be generated when compared to existing conditions. Given that most of the A-1 North Property is currently developed, there is no likelihood of increasing the rate of runoff to the point that stormwater collection capacity is exceeded. Therefore, the potential for increases in polluted stormwater runoff would be a less-than-significant impact.
- f) The proposed Project does not have the potential to otherwise degrade water quality because the uses accommodated by the various components of the proposed Project are the same uses that currently exist at the Airport. This would result in no impact.
- g) The proposed Project does not involve residential development and would have no impact in terms of placing housing units within a 100-year floodplain.
- h) The existing Airport, the A-1 North Property, and the Adjacent Property are not located within a 100-year floodplain. The Federal Emergency Management Agency (FEMA) flood map showing the Airport and the Airport vicinity identifies a 100-year floodplain along Empire Avenue. The map identifies this area as Zone AE, which indicates "base flood elevations determined". Since the flow of floodwaters are contained on Empire Avenue and since the proposed Project would not result in any changes to Empire Avenue, the proposed Project would have no impact to the 100-year floodplain.
- i) Not only are the existing Airport, the A-1 North, and the Adjacent Properties not located within or near a 100-year floodplain (see VIII.h, above), but the area is not subjected to significant flooding. Stormwater collection services in the area are capable of handling current stormwater runoff. Further, the Airport is not located within a close proximity to a levee or dam. The proposed Project would have no impact in terms of injury or death as a result of flooding as a result of the failure of a levee or dam.
- j) Due to the distance from the Airport to the ocean, there is no potential for impact as a result of a seiche, tsunami, or mudflow. This would constitute no impact.

Issues (and Supporting Information Sources):	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

IX. LAND USE AND PLANNING – Would the project:

- a) Physically divide an established community?

171

Issues (and Supporting Information Sources):	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

IX. LAND USE AND PLANNING (cont.)

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

a) Various components of the proposed Project would result in development of portions of the Airport, the A-1 North Property, and the Adjacent Property. All of these areas are currently graded and/or developed and are used as either parking facilities or aviation support. These areas are commercial and industrial in character and are not located adjacent to residential development. Given the compatibility of the land uses that would occur as a result of the implementation of the various components of the proposed Project with the surrounding land uses and the lack of adjacent residential development, these components of the proposed Project would not divide an established community.

The adoption of Part 77 standards and the height limitations ordinance as well as the adoption of the noise insulation ordinance by the City of Burbank would not result in any changes in land uses in the Airport vicinity. Therefore, this component of the proposed Project would not divide an established community.

b) The Adjacent Property and the A-1 North Property are within the City of Burbank and are subject to the City of Burbank General Plan, the City of Burbank Zoning Code, and the City of Burbank Golden State Redevelopment Project Plan. These applicable local land use plans, requirements, and policies are maintained by the City of Burbank Community Development Department.

As part of the proposed Project, a portion of the Adjacent Property and the portion of the A-1 North Property to be acquired by the Authority would be rezoned from M-2 (General Manufacturing) to Planned Development. The various components that would be developed on the Adjacent Property and the A-1 North Property would be consistent with the Planned Development zoning.

The Golden State Redevelopment Project Area has been physically divided into three specific land use areas or classifications, each of which is to be devoted to either airport and/or industrial uses. The entirety of the Airport property and its surrounding properties (which includes the portion of the Airport, the Adjacent Property, and the A-1 North Property) has been classified within "Area A (Airport & Related)." Under the provisions of the Golden State Redevelopment Plan, Area A is intended to be developed and used for airport development including but not limited to runways,

172

taxiways, passenger terminals and related commercial uses, air cargo, automobile parking facilities, aircraft hangars, aircraft repair facilities, aircraft control facilities and other related and compatible uses.

The adoption of Part 77 standards and the height limitations ordinance by the City of Burbank would help ensure that only projects that are not hazards to navigation would be built near the Airport. The adoption of these standards would be consistent with the City's plans and policies.

The various components of the proposed Project would not result in a land use that is incompatible with the City of Burbank General Plan Land Use Element, the City's Zoning Ordinance, or the Golden State Redevelopment Project Redevelopment Plan. Therefore, the project would have no impact in terms of conflict with applicable plans.

- c) The Airport does not fall within any habitat conservation or natural community conservation plans; therefore, the proposed Project would have no impact in this regard.

Issues (and Supporting Information Sources):	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---------------------------------------	--	-------------------------------------	------------------

X. MINERAL RESOURCES -- Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
- a,b) The proposed Project would occur on land that is currently used for or was historically used for aviation-related purposes. The Airport vicinity is not known to contain any significant mineral resources of value to the region or state. The existing Airport, the A-1 North Property, and the Adjacent Property have been graded and compacted and mostly are covered with impervious surfaces. The only excavation that would occur as part of the proposed Project is associated with the underground fuel tanks at the QTA on the rental car center and the underpass beneath the realigned Terminal Loop Roadway. However, these excavation activities would be relatively minor and would not result in the loss of any significant resources. Therefore, the proposed Project would have no impact in this regard.

Issues (and Supporting Information Sources):

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---	--	---	----------------------

XI. NOISE – Would the project result in:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a,b) The acquisition and development of the A-1 North Property, the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, and the relocation of Lot A could result in the exposure of persons to or generation of noise levels and groundborne vibration on a temporary basis during the construction phase of the various components of the proposed Project. These impacts would result from the use of construction equipment. Groundborne vibration is generally a concern only with high impact equipment, such as pile drivers. Given that no major subsurface excavation (the construction of the underground fuel tanks associated with the rental car center are not likely to require the use of this type of heavy equipment) would take place for any of these components of the proposed Project, vibration is not expected to reach any significant levels. In addition, these activities would take place in accordance with the provisions of the City of Burbank's Noise Control Ordinance. Therefore, this would not be a significant impact.

Due to the location of these proposed components relative to the runways at the Airport and to existing roadways, these project components would be exposed to intermittent periods of aircraft

noise or noise generated by passing vehicles. Due to the location of these project components, the noise levels generated by construction equipment would not be significantly greater than the noise levels frequently experienced in surrounding land uses. In addition, there are no noise sensitive land uses in the vicinity of any of the project component sites. Therefore, this is a less-than-significant impact.

The completion of Taxiway D would result in a slight change in the use of runways at the Airport. As a result, the noise from aircraft operations in the Airport vicinity would slightly change. To determine this change in noise, the Integrated Noise Model (INM) was used to generate noise contours at the Airport. The information and assumptions that were used in developing the INM noise contours include the following:

- In the year 2000 the Authority prepared a Federal Aviation Regulation (FAR) Part 161 study that included a detailed projection of aviation activity. Much of the forecast information that resulted from the FAR Part 161 Study was used as the basis for revising the base year activity (2003) and the forecast projections for 2008 (this document is available for review at www.burbankpart161.org/pr.html).
- Passenger Airline Operations. For the base year (2003) passenger airline operations were calculated to include commuter and regional jet traffic. The passenger airline operation number was calculated using existing air carrier operations provided by the Authority, subtracting large cargo operations (Federal Express and United Parcel Service), and adding the regional jet and commuter airline traffic. The large cargo and commuter/regional jet traffic was calculated from the flight tracking data received from the Authority.

The forecasts for passenger airline operations were calculated using the average annual growth rate for passenger airline operations from the FAR Part 161 study of 2.3 percent. This growth rate was used and applied to the base year (2003) passenger airline operations to estimate passenger airline operations through the year 2008.

- Cargo Large Operations. Large cargo operations include Federal Express and United Parcel Service flights conducted at the Airport. For 2003, these operations were calculated from the flight track data supplied by the Authority. This information has been used in past forecast projections, including the Part 161 study and is a good source of instrument flight operations.

The FAR Part 161 study assumed that the number of large cargo operations would not increase through the year 2008. Based on the information in the FAR Part 161 study, the assumptions used in that study also were applied to these projections and large cargo operations were assumed not to grow through the year 2008.

- Cargo Small Operations. Small cargo operations are the flights operated by Ameriflight, the small package courier as well as several other similar small package couriers. Ameriflight, the largest small package courier operating at Bob Hope Airport, specializes in the transportation of time-sensitive material including financial documents. Based on the information in the FAR Part 161 study discussing small package courier operations, a base year of 19,094 total

operations was used for small cargo operations. This figure was used as the base year for the FAR Part 161 study as well. According to the analysis in the FAR Part 161 study, small cargo operations were not projected to grow in the future. Therefore, the revised forecasts applied that same assumption through 2008 and small cargo operations remained at 19,094.

- General Aviation (GA) - Jets. GA jet operations for 2003 were calculated as a percentage of the GA activity recorded in the flight track data supplied by the Authority. Because the flight tracking data includes only instrument flight operations (instrument flight plans filed with the FAA Air Traffic Control Services), the data does not account for all operations because aircraft operating under visual flight rules (VFR) at the Airport are not tracked by the flight tracker. With the flight tracker not able to account for all aircraft operations, the percentage of GA jets was reduced slightly to account for the VFR flights in the GA piston category, which includes both instrument and visual operations. The GA jet operations were reduced because it was assumed that 100 percent of the GA jets operating at the Airport operated under instrument flight rules.

In projecting GA jet operations for 2008 the FAR Part 161 study used an average annual growth rate of 6.6 percent. Due to the greater than forecast growth in the number of GA jet operations at BUR over the last several years, a slightly lower growth rate was used to project operations in the future. The 2004 FAA Aerospace Forecasts projects GA jet operations to increase at an average of 4.9 percent through 2015. Therefore, the national average of 4.9 percent growth was applied to the GA jet operations at BUR to calculate the 2008 operation projections.

- GA – Turbo Prop. GA turbo prop operations for 2003 also were calculated as a percentage of the GA activity recorded in the flight track data supplied by the Authority. Again, because the flight tracking data includes only instrument flights, not all of the flight data is included for GA operations. As with the GA-jets, it was assumed that 100 percent of the turbo prop aircraft were operating at the Airport under instrument flight rules. In factoring in the visual flight operations for GA, the turbo prop percentage also was decreased slightly.

The 2008 projections for turbo prop operations were based on the Part 161 study growth rate of 1.2 percent.

- GA - Piston. GA piston operations for 2003 were calculated based on the 12-month monthly activity reports from the FAA form 7230-1. The numbers from these forms were adjusted based on input from the BUR air traffic control tower to determine the number of GA-piston aircraft for 2003. Due to the large number of visual flight operations that occur with this category of aircraft operations it was necessary for air traffic control to assist in establishing the baseline.

Based on the growth of GA jets, turbo props, and helicopters over the past several years it was determined that GA piston operations would decrease as projected in the FAR Part 161 study. It was projected that the decrease in GA piston aircraft would not be as significant as projected

in the FAR Part 161 study and would only decrease by 2.2 percent instead of the projected decrease of 2.6 percent. A 2.2 percent annual decrease was used to project GA piston operations for 2008.

- Helicopter. Helicopter operations for 2003 also were also calculated based on the 12-month monthly activity reports from the FAA form 7230-1. The numbers from these forms were adjusted based on input from the BUR air traffic control tower to determine the number of helicopter operations for 2003. Again, helicopter operations are largely made up of visual flights and the input provided by air traffic control helped in establishing the baseline.

According to the FAR Part 161 study, helicopter operations were anticipated to grow at a 1.0 percent average annual growth rate. Therefore, a 1.0 percent average annual growth rate was used in these projections to forecast helicopter operations through the year 2008.

- Total average day operations were calculated by dividing annual operations by 365.
- Time of day (Day, Evening and Night) splits for air carrier, cargo and general aviation were based on the Landrum & Brown/SH&E FAR Part 161 study and these splits were applied to the total day operation numbers for each of the categories of aircraft.
- In the Landrum & Brown/SH&E FAR Part 161 study no provisions were made for the Canadair Regional Jet (CRJ) as part of the air carrier fleet mix. In addition, the McDonnell Douglas-80 aircraft (MD80) was a larger percentage of the fleet mix in the Landrum & Brown Part 161 study than occurred in the actual 2003 flight tracking data. The 2003 base year fleet mix was updated to include the CRJ and an updated percentage of MD80 aircraft. Based on 2003 actual operations data the CRJ accounted for approximately 6% of the air carrier fleet mix while the MD80 accounted for 10%. The operations for the CRJ and MD80 were adjusted and incorporated into the 2003 fleet mix figures. Operations for the other aircraft in the air carrier fleet mix were adjusted proportionately.
- The 2003 fleet mix for large cargo and small cargo was assumed to be the same as the Landrum & Brown/SH&E FAR Part 161 study data for 2000-2003, while the general aviation fleet mix was extrapolated for the 2003 base year from the Landrum & Brown/SH&E FAR Part 161 study.
- Runway utilization from the Landrum & Brown/SH&E FAR Part 161 study was used for the 2003 base year condition and applied to each runway. For the future with the completion of Taxiway D, it was assumed that the general aviation piston and turboprop aircraft based in the northwest quadrant of the Airport would use Runway 26 for departures during the nighttime hours. This assumption would result in disclosing the worst-case noise-related impact resulting from the completion of Taxiway D. Assuming that general aviation operations would use Runway 26 for departures during the nighttime hours results in a slight increase in the number of departures on Runway 26 compared to the existing condition. Existing and future runway utilization is shown in Table 5.

TABLE 5: RUNWAY UTILIZATION

2003 Existing	Operations			Percentage		
Runway	Day	Evening	Night	Day	Evening	Night
08	169.45	27.09	12.39	34.72	5.55	2.54
15	148.28	22.77	13.00	30.39	4.67	2.66
26	8.82	2.32	2.77	1.81	0.47	0.57
33	9.89	2.22	14.77	2.03	0.46	3.03
Police Helicopters	37.93	10.81	5.50	7.77	2.21	1.13
2003 with Completion of Taxiway D	Operations			Percentage		
Runway	Day	Evening	Night	Day	Evening	Night
08	169.45	27.09	11.91	34.72	5.55	2.44
15	148.28	22.77	11.69	30.39	4.67	2.39
26	8.82	2.32	5.02	1.81	0.47	1.03
33	9.89	2.22	14.31	2.03	0.46	2.93
Police Helicopters	37.93	10.81	5.50	7.77	2.21	1.13
2008 without Completion of Taxiway D	Operations			Percentage		
Runway	Day	Evening	Night	Day	Evening	Night
08	170.50	28.22	13.83	33.30	5.51	2.70
15	161.66	24.47	14.64	31.57	4.78	2.86
26	8.62	2.45	2.81	1.68	0.48	0.55
33	10.55	2.35	15.12	2.06	0.46	2.95
Police Helicopters	41.20	10.23	5.40	8.05	2.00	1.05
2008 with Completion of Taxiway D	Operations			Percentage		
Runway	Day	Evening	Night	Day	Evening	Night
08	170.50	28.22	13.39	33.30	5.51	2.61
15	161.66	24.47	12.90	31.57	4.78	2.52
26	8.62	2.45	5.58	1.68	0.48	1.09
33	10.55	2.35	14.52	2.06	0.46	2.84
Police Helicopters	41.20	10.23	5.40	8.05	2.00	1.05

TABLE 6: OPERATIONS AND TIME OF DAY SPLITS

Actual 2003 Airport Operations

	Annual	Total Day	Time of Day		
			Day	Evening	Night
Passenger					
Airline	60,964	167.0	125.8	35.2	6.0
Cargo-large	1,494	4.1	1.7	1.7	0.7
Cargo-small	19,094	52.3	19.4	5.8	27.2
GA-Jets	21,922	60.1	48.8	6.1	5.3
GA-Turbo	6,790	18.6	15.3	2.1	1.3
GA-Piston	48,039	131.6	125.5	3.6	2.5
Helicopters	19,776	54.2	37.9	10.8	5.5
TOTAL	178,079	487.9	374.4	65.3	48.5

TABLE 7: CHANGE IN ACREAGE IN AREAS WITHIN THE 65 DB CNEL IN THE AIRPORT VICINITY AREA AS A RESULT OF THE COMPLETION OF TAXIWAY D

Zoning Codes	Areas East of the Airport	Areas North of the Airport	Areas South of the Airport	Areas West of the Airport	Total Change
Unzoned	0.00	-0.06	-1.79	4.10	2.25
AIRPORT*	0.00	-1.09	0.00	2.88	1.79
C2	0.00	0.03	-0.31	0.13	-0.15
M1	0.00	-0.93	0.00	0.95	0.02
M1	0.00	0.00	-0.93	0.00	-0.93
M1-1	0.00	0.00	0.00	0.00	0.00
M2	2.12	-0.75	-0.69	30.72	31.40
M2	10.00	-0.41	-0.09	0.00	9.49
M2-1	0.00	0.00	0.00	2.91	2.91
M2-1	0.00	0.00	0.00	0.20	0.20
MR1	0.00	-0.92	0.00	0.00	-0.92
MZ	0.00	0.00	0.00	0.66	0.66
PF	0.00	-1.10	-3.16	1.96	-2.30
R1	0.00	-6.80	-1.48	0.00	-8.28
R1	0.00	0.00	-0.11	0.00	-0.11
R1	0.00	0.00	-2.94	0.00	-2.94
R1	0.00	0.00	-0.07	0.00	-0.07
R1YY	0.00	0.00	-6.32	0.00	-6.32
R2	0.00	0.00	-0.22	0.00	-0.22
R3	0.00	0.00	-0.37	1.18	0.81
R4	0.00	0.00	-0.16	0.00	-0.16
R4	0.00	0.00	-0.20	0.00	-0.20
RD1.5	0.00	-0.28	-0.33	0.36	-0.24
RD2	0.00	0.00	-1.00	0.00	-1.00
RAILROAD	0.00	0.00	-0.08	0.00	-0.08
TOTAL	12.12	-12.29	-20.26	46.03	25.60

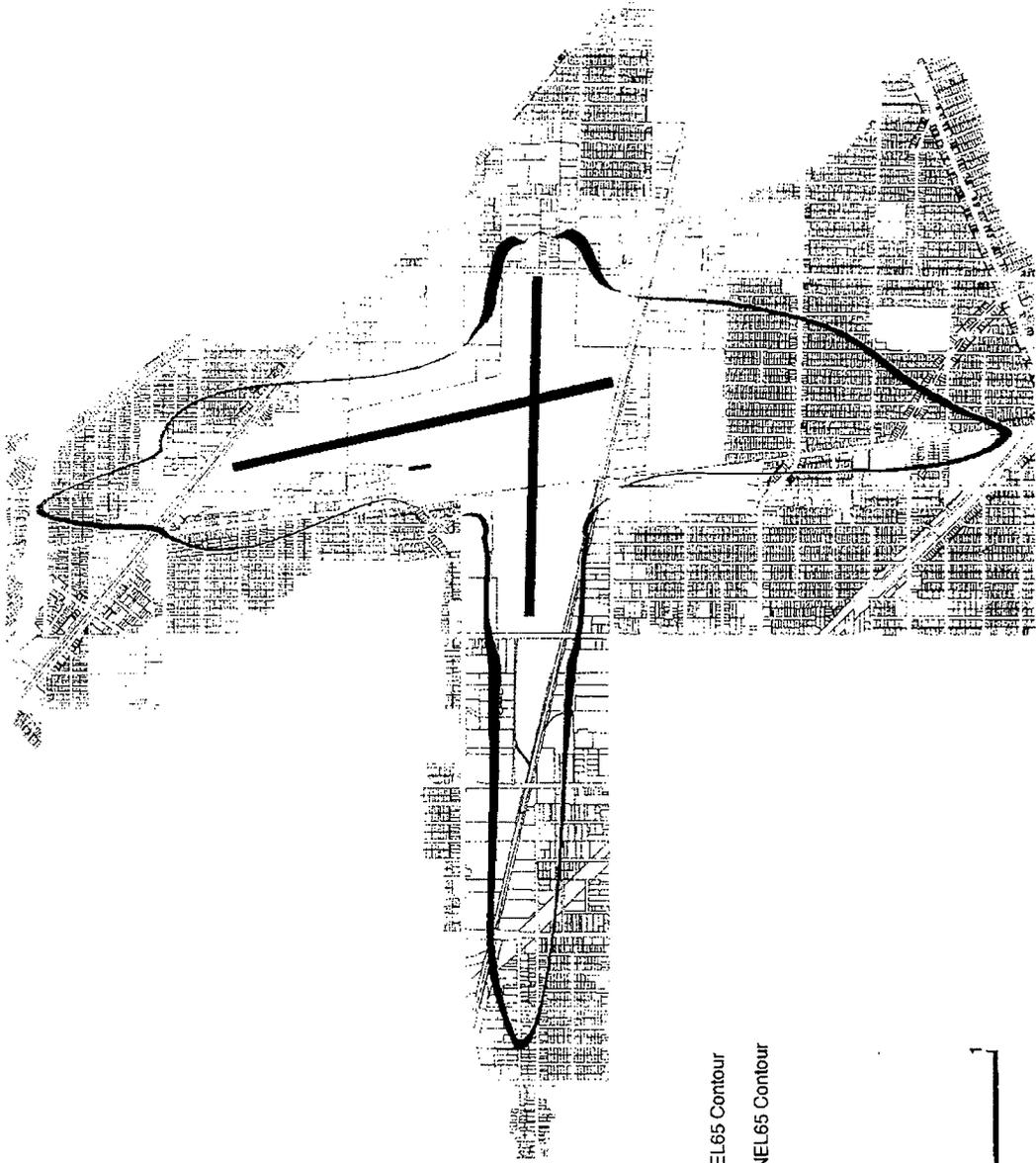
- Operations and time of day (day, evening, night) splits were all based on the Landrum & Brown/SH&E FAR Part 161 study. These splits are shown in Table 6.
- The air carrier fleet mix was revised slightly from the Landrum & Brown/SH&E FAR Part 161 study to reflect the change in MD80 aircraft due to newer and more efficient aircraft being purchased by Alaska Airlines and American Airlines, the two primary users of the MD80 at the Airport. The average age of the MD80 fleet for these two airlines is between 12 and 14 years old. Thus, the share of MD80 aircraft operating at BUR is estimated to decrease from 10% in 2003 to an estimated 1.5% in 2008. In addition, the air carrier fleet mix was updated to reflect the estimated increase in the use of the CRJ from 6% in 2003 to 9% in 2008. The remaining fleet mix percentages were adjusted proportionately for the remaining air carrier aircraft.
- The fleet mix for general aviation, large cargo and small cargo was all based on the Landrum & Brown/SH&E Part 161 study but extrapolated for the year 2008 where necessary.

The results from the INM runs show that the completion of Taxiway D would result in a negligible increase in the overall area within the 65 dB CNEL in the Airport vicinity (see Table 7 and Figure 6). However, the number of acres of residential uses within the 65 dB CNEL would decrease as a result of the completion of Taxiway D (see Table 7).

For areas west of the Airport, there would be an increase of approximately 46 acres within the 65 dB CNEL upon completion of Taxiway D (see Table 7). The primary land uses within these 46 acres are manufacturing and industrial uses. The only noise sensitive land uses that would be within the 65 dB CNEL as a result of the completion of Taxiway D are portions of 9 residential parcels along Hart and Simpson Streets in the City of Los Angeles (see Figure 7). A total of 1.54 acres of residential land would be included in the 65 dB CNEL upon completion of Taxiway D. The CNEL within the 1.54-acre residential area west of the Airport that would be within the 65 CNEL would increase from 64.8 dB CNEL to 65.0 dB CNEL. This increase of 0.2 dB CNEL would not be noticeable and is not considered to be significant.

For areas east of the Airport, there would be an increase of approximately 12 acres within the 65 dB CNEL upon completion of Taxiway D (see Table 7). No residential land uses exist within these 12 acres (see Figure 6).

For the areas north and south of the Airport, the completion of Taxiway D would result in a decrease of approximately 33 acres within the 65 dB CNEL (see Table 7 and Figure 6). As shown in Table 7, approximately 20.29 acres of residential land uses would no longer be within the 65 dB CNEL in areas north and south of the Airport compared to the existing conditions. The CNEL in the 7.08-acre residential area north of the Airport that would no longer be within the 65 dB CNEL, which includes all or a portion of approximately 41 residential parcels, would decrease by 0.3 dB CNEL. The CNEL in the 13.21-acre residential area south of the Airport that would no longer be within the 65 dB CNEL, which includes all or a portion of approximately 108 residential parcels, would decrease by 0.2 dB CNEL.



LEGEND

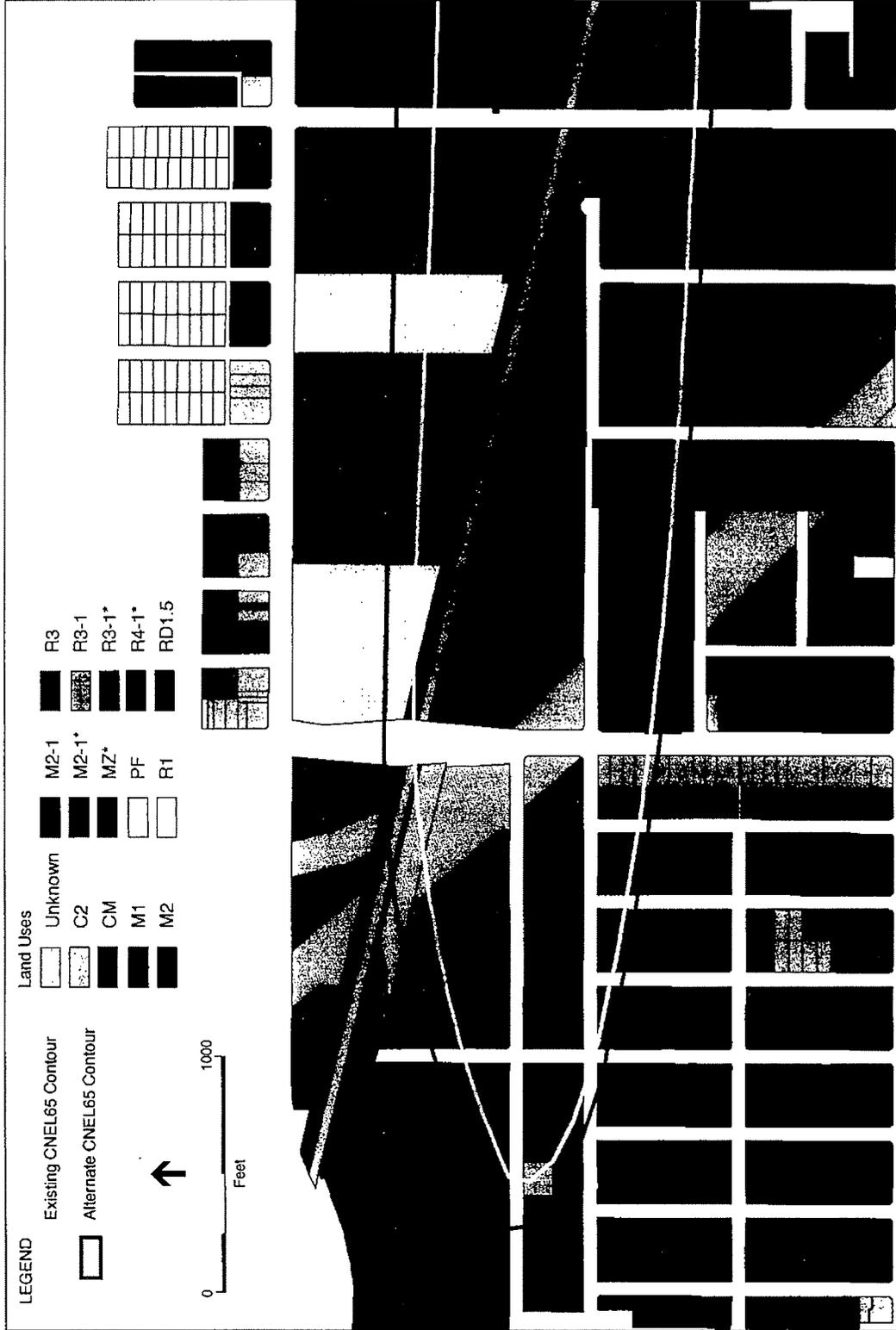
- Existing CNEL65 Contour
- Alternate CNEL65 Contour
- Noise Impact Areas
 - Gain
 - Loss

0 Mile

↑

Development Agreement and Related Actions / 204014 ■
Figure 6
 Existing and Projected 65 CNEL Noise Contour

SOURCE: PSOMAS and Environmental Science Associates, 2004



Development Agreement and Related Actions / 204014
Figure 7
 Detail of Land Uses West of BUR within the 65 CNEL
 Noise Contour under Existing Conditions and
 upon Completion of Taxiway D

SOURCE: PSOMAS and Environmental Science Associates, 2004

As stated above, none of the changes to the noise environment as a result of the completion of Taxiway D would equal or exceed the 1.5 dB threshold of significance within the 65 dB CNEL contour or the 3 dB threshold of significance in the 60-65 dB CNEL contour. Similarly, because the flight tracks and flight track usage to the west of the Airport does not change, the changes in exposure in the 45-60 dB CNEL contours would not exceed the 5 dB threshold of significance criteria. Therefore, the completion of Taxiway D would result in a less-than-significant impact on the noise environment in the Airport vicinity.

- c) The acquisition and development of the A-1 North Property, the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, and the relocation of Lot A would be exposed to intermittent periods of aircraft noise or noise generated by passing vehicles. A permanent increase in ambient noise levels at these project component sites above existing noise levels would not occur. These project components would include the same number of vehicle trips as the existing conditions, and would not introduce new vehicle noise sources. These project components would not induce more vehicle trips, but would reduce the number of vehicle miles traveled when compared to existing conditions. This would result in a corresponding reduction in the contribution to roadway noise in the vicinity of the Airport. Because the noise impacts would not be significant and because there are no noise-sensitive land uses in the vicinity of the locations where the various components of the proposed Project would occur, this impact is considered to be less than significant.
- d) A temporary or periodic increase in noise levels could be experienced during the construction phase of various components of the proposed Project. However, due to the location of construction (on the airfield in the case of the completion of Taxiway D, on the Adjacent Property in the case of the relocation of Lot A, and on the A-1 North Property in the case of the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection and the development of valet parking and the rental car center), the temporary noise levels generated by construction equipment would not be greater than existing noise levels (as a result of adjacent road noise, airfield use, etc.). This is a less-than-significant impact. See also the discussion under XI.a and XI.b, above.
- e) The various components of the proposed Project are located within and adjacent to a public-use airport. Due to the location of the various components of the proposed Project relative to the runways at the Airport and to existing roadways, each of the various components of the proposed Project is exposed to intermittent periods of aircraft noise or noise generated by passing vehicles. The noise levels currently experienced at the each of the locations of the various project components would not change as a result of the proposed Project over the long term.¹ Short-term noise impacts would result from construction activities. These impacts would be temporary, and less than significant. As noted above, the number of residences within the 65 dB CNEL noise contour would decrease. See also the discussion under XI.a and XI.b above.

¹ Pursuant to CEQA Guidelines section 15074(e), the project would not result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area.

- f) The proposed Project would not take place within the vicinity of a private airstrip, and therefore, no impact would occur.

Issues (and Supporting Information Sources):	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---	--	---	----------------------

XII. POPULATION AND HOUSING – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Displace substantial numbers of people necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a,b,c) The proposed Project does not involve any displacement of housing or people. No effect on housing and population would occur as a result of the proposed Project. Implementation of the proposed Project would not include, generate, or directly affect any residential population. Implementation of the proposed Project would not include, generate, or affect any housing or housing-related land uses or activities. No major infrastructure extensions would be required for the proposed Project that could disrupt or divide a community. The proposed Project would not directly or indirectly increase or decrease population or housing levels, induce substantial population growth (directly or indirectly), displace substantial numbers of existing housing, or necessitate new housing construction elsewhere because the proposed Project is not expected to lead, directly or indirectly, to increased passenger demand at the Airport. Therefore, no population and housing impact would occur.

Issues (and Supporting Information Sources):

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---------------------------------------	--	-------------------------------------	------------------

XIII. PUBLIC SERVICES --

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) There would be no significant new buildings or structures or public service demand-generating activities associated with implementation of the proposed Project. There would be no increase in the number of vehicle parking spaces associated with the relocation of parking. The various components of the proposed Project would have no impact on the effectiveness of police protection, fire protection, schools, parks, or other public service facilities. The various components of the proposed Project would not result in the generation of any additional students or an increase in the number of park users. In addition, the Authority has its own police department that handles all police protection services at the Airport. The proposed Project would not result in additional police protection services compared to the existing conditions.

Issues (and Supporting Information Sources):

	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---------------------------------------	--	-------------------------------------	------------------

XIV. RECREATION --

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a,b) Implementation of the proposed Project would not include, generate demand for, or affect any recreational resources or recreational-related activities. No change to public recreation or park resources would occur. There are no parks in the immediate area of the Airport that would be affected. The closest park to the Airport is Pacific Park, which is approximately one half of a mile south of the Airport. There would be no increase in park use as a result of the proposed Project, nor would the proposed Project require expansion of existing park facilities. Pacific Park would not be adversely affected by the proposed Project. This would result in no impacts in this regard.

Issues (and Supporting Information Sources):	<i>Potentially Significant Impact</i>	<i>Less Than Significant With Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

XV. TRANSPORTATION / TRAFFIC – Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Result in inadequate parking capacity? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a,b) The proposed Project would result in a decrease of 254 public parking spaces at the Airport and an increase of 435 employee parking spaces (consisting of 385 new employee parking spaces, and the conversion of the 69 existing Car Wash valet parking spaces to 50 employee parking spaces). The number of vehicle trips to and from the Airport would not be affected because parking does not

currently constrain air passenger growth at the Airport; therefore, the changes in the number of parking spaces would not change air passenger traffic at the Airport. A reduction in parking owned by the Authority likely would result in air passengers using private, off-site parking facilities if Authority-owned facilities were fully occupied. Off-site parking facilities currently have excess capacity. Therefore, the demand for parking at the Airport would not change as a result of the proposed Project. However, there would be a redistribution of vehicles traveling between on-Airport locations due to the following proposed changes: (1) the location to which valet attendants would move vehicles; (2) the location for long-term public parking; (3) the location for employee parking; (4) the manner in which rental car customers obtain and return their rental cars; and (5) the introduction of premium self-parking spaces in proximity to the Airport terminal (see Appendix B for a detailed description of these changes in traffic movements). Traffic movements associated with short-term public parking would not be affected by any of the components of the proposed Project. In addition, no changes in surface traffic patterns would occur as a result of the relocation of Lot A, the realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection, or the completion of Taxiway D. Thus, the A-1 North Property acquisition and development component of the proposed Project would result in a redistribution of some on-Airport vehicle trips compared to existing conditions.

Effect of the Proposed Reconfiguration of Valet Parking Spaces (including Relocation of Spaces from the B-6 Trust Property). The A-1 North Property acquisition and development component of the proposed Project would relocate the valet parking spaces currently on the Valet East Lot, Car Wash and B-6 Trust Property to the A-1 North Property (the current use of the Valet South Lot would continue). As a result of that change, valet parking patrons would enter and exit the Airport (and drop off and pickup their vehicles) the same way as they currently do. With the use of the A-1 North Property, the use of the B-6 Trust Property for overflow valet parking would be discontinued. Compared to existing conditions where valet-parked vehicles travel through the Hollywood Way intersections at Thornton Avenue and Winona Avenue to be stored at the B-6 Trust Property, no valet-parked vehicles would travel through these intersections under the proposed Project and this would result in a reduction of an average of 1,200 trips per day through the Hollywood Way intersections at Thornton Avenue and Winona Avenue.

Effect of the Proposed Relocation of Long-Term Public Parking Spaces. Currently, long-term public parking spaces are available at Authority-controlled parking lots and at the privately-owned A-1 North parking lot. The A-1 North Property acquisition by the Authority and the development component of the proposed Project would reduce the number of long-term public parking spaces at the Airport, chiefly through the conversion of spaces in the A-1 Lot from long-term public parking not operated by the Authority to other types of parking (mostly valet) operated by the Authority. As a result, long-term public parking patrons would have three entry points to access the long-term public parking on the A-1 Lot (Hollywood Way / Thornton Avenue entrance, Empire Avenue entrance, and the driveway from the Hollywood Way / Avon Street intersection) compared to the two entry points to the existing long-term public parking operated by the private developer (from the Hollywood Way / Avon Street intersection and from Empire Avenue). Similarly, long-term public parking patrons would have two exits from the long-term public parking lot (Hollywood Way / Thornton Avenue intersection and the Empire Avenue exit) compared to the two exits from

the existing long-term public parking operated by the private developer (to the Hollywood Way / Avon Street intersection and to Empire Avenue). This would shift the turning movements that currently occur at the Hollywood Way / Avon Street intersection and the entrance / exit with Empire Avenue from long-term public parking patrons entering and exiting the existing A-1 Lot to the Hollywood Way / Thornton Avenue or Empire Avenue / Terminal Loop Roadway intersections. Even using extremely conservative assumptions that do not reflect the current owner's ability to fully use the existing 2,176 parking spaces on the A-1 North Property for airport parking, this shift would not have a significant impact on traffic. Assuming that the existing long-term public parking lot operated by the private developer has an occupancy rate of 25% and that there is an average two-day stay for long-term public parking patrons, this would result in the generation of 544 vehicle trips per day. To identify the greatest possible impacts associated with the proposed Project, it is assumed that the long-term public parking lot on the A-1 North Property after acquisition by the Authority would have 100% occupancy. With an average two-day stay for long-term public parking patrons, this would result in the generation of 557 vehicle trips per day. This would result in an increase of 13 vehicle trips per day compared to existing conditions. Under both the existing and future scenarios, it is acknowledged that these trips are not concentrated in the peak traffic hours and are spread relatively evenly over the hours of flight operations. With flights operating between 7:00 a.m. and 10:00 p.m., passengers would be expected to arrive and depart between the hours of 6:00 a.m. and 11:00 p.m. Thus, assuming that every on-site space were used every day, the increase of 13 trips would be expected to average less than one additional trips per hour, or about one inbound trip and one outbound trip every two hours. As noted above, these trips would be spread over three entrance points and two exit points to the Airport. Each of these intersections is currently operating at an acceptable level of service. Spreading one additional entrance trips per two-hour period over three intersections operating at acceptable levels of service and one additional exit trips per two-hour period over two intersections operating at acceptable levels of service would not create a significant adverse impact on traffic.

For the other long-term public parking lots operated by the Authority, there would be no change in the traffic movements associated with vehicles entering and exiting these lots. Therefore, the A-1 North Property acquisition and development component of the proposed Project would slightly reduce turning traffic movements at the Hollywood Way / Avon Street intersection and would slightly increase turning traffic movements at the Airport exits to Hollywood Way and Empire Avenue compared to existing conditions. Given that the Hollywood Way / Thornton Avenue and Empire Avenue / Terminal Loop Roadway intersections operate at acceptable levels of service and that the increase in vehicle trips through these intersections as a result of the development of long-term public parking on the A-1 North Property would be within the daily fluctuation of traffic, no changes to the level of service at either intersection would occur. Thus, the shift of vehicles exiting the long-term public parking lot on the A-1 North Property from one intersection (Hollywood Way / Avon Street) to two intersections (Hollywood Way / Thornton Avenue and Empire Avenue / Terminal Loop Roadway) that operate at acceptable levels of service would be a less-than-significant impact. Furthermore, any increase at the Hollywood Way / Thornton Avenue intersection would be offset by the reduction in valet trips described above.

Effect of the Proposed Relocation of Employee Parking Spaces. The A-1 North Property acquisition and development component of the proposed Project would relocate some employee parking spaces from the A-1 Lot to the Car Wash area or to the Employee Lot. As a result of the change from the A-1 Lot to the Car Wash area, traffic movements (turns) by employees would change from the driveway that leads west from the Hollywood Way / Avon Street intersection to the Hollywood Way / Thornton Avenue or Empire Avenue / Terminal Loop Roadway intersections. Because a greater number of employee spaces would be in the Employee Lot as a result of the proposed Project, there would be a slight increase in the number of traffic movements by employees using the Employee Lot. Since access to the employee lot is via the Hollywood Way / Winona Avenue intersection, there would be slight increase in the traffic turning movements at this intersection. However, given the currently acceptable level of service at the Hollywood Way / Winona Avenue intersection and the few number of employees that arrive or depart during the a.m. or p.m. peak hours on Hollywood Way, this is not considered to be a significant adverse impact. With no employee parking occurring in the A-1 Lot, no shuttle buses would be used to provide employees access to the terminal from that location. Thus, the number of trips through the Hollywood Way / Thornton Avenue intersection would be reduced. Employees who park at the Car Wash area to be converted from valet parking to employee parking would walk from the Car Wash area to the terminal. Therefore, the A-1 North Property acquisition and development component of the proposed Project would reduce employee-generated turning traffic movements at the Hollywood Way / Avon Street intersection and the Empire Avenue and Terminal Loop Roadway intersection and would not increase traffic generated by employees on area roads.

Effect of the Proposed Relocation of Rental Car Parking Spaces from the Rental Ready Lot (also known as the Terminal South Lot). The A-1 North Property acquisition and development component of the proposed Project would relocate the rental car parking spaces currently in the Rental Ready Lot to the A-1 Lot; it is assumed that some off-airport rental car companies would also move on-airport as a result of this project component.

Rental car customers currently deplane, and either pick up their rental cars in Terminal South Lot and leave the Airport either via exits to Hollywood Way or Empire Avenue, or take a shuttle bus from the valet drop-off area to pick up their rental car at one of the off-airport rental car companies. When returning to the Airport to drop off the rental car, rental car customers currently enter the Airport Loop Roadway from either Hollywood Way or Empire Avenue, or enter the Terminal South Lot directly from Empire Avenue west of the above-cited Empire Avenue entrance to the Airport. Customers who return the rental car to an off-airport rental car company use a shuttle bus to access the airport and the terminal; depending on the location of the off-airport rental car company, their shuttle buses use the Hollywood Way entrance or the Empire Avenue entrance to the Airport. As a result of the proposed change, all rental car customers would deplane and take the shuttle bus from the shuttle bus stop (across the Terminal Loop Roadway from the terminal) to the rental car counter at Lot A-1 (using the driveway to the rental car center from the realigned Terminal Loop Roadway). If the rental car customer is using a rental car company that has off-Airport operations, the rental car customer would get on that company's shuttle bus at the A-1 Lot. For rental car customers renting from companies with on-Airport operations, the rental car customer would leave the Airport in their rental car via a driveway that provides access to either the

northbound portion of the realigned Terminal Loop Roadway or to the driveway that leads west from the Hollywood Way / Avon Street intersection. Rental car customers using the northbound portion of the realigned Terminal Loop Roadway would leave the Airport either via exits to Hollywood Way or Empire Avenue. Rental car customers using the driveway that leads west from the Hollywood Way / Avon Street intersection would either turn right to go southbound on Hollywood Way, go straight through the intersection onto Avon Street for access to eastbound or westbound Empire Avenue, or turn left to go northbound on Hollywood Way to the Hollywood Way / Thornton Avenue intersection. The addition of the Hollywood Way / Avon Street intersection as a potential exit from the Airport for rental car customers would slightly increase turning traffic movements at the Hollywood Way / Avon Street intersection and would slightly decrease turning traffic movements at the Airport exits to Hollywood Way and Empire Avenue compared to existing conditions. The Hollywood Way / Avon Street intersection currently operates at the best level of service (LOS A). The slight increase in the number of rental cars that would go through this intersection would not result in any changes in the overall LOS at this intersection and would be offset by the reduction in the number of long-term public parking customers that currently exit the A-1 Lot through the Hollywood Way / Avon Street intersection. Thus, given the low number of rental car customers exiting the Airport on a daily basis, the changes in these turning traffic movements would not be significant.

When returning to the Airport to drop off their rental car, all rental car customers would go to the A-1 Lot, accessing the Airport either via the entrances from Hollywood Way or Empire Avenue. Once on the Terminal Loop Roadway, the rental car customer would access the rental car center via the driveway from the realigned Terminal Loop Roadway. The customer would use the shuttle bus to the shuttle bus drop-off location at the terminal (using the driveway from the rental car center to the northbound portion of the realigned Terminal Loop Roadway, and the U-turn on the Terminal Loop Roadway).

With the assumption that some off-airport rental car companies would use the facilities on the A-1 Lot, there would be fewer trips made by rental car company shuttles to off-airport locations. Depending on the location of the off-airport rental car company, the shuttle buses operated by the remaining off-airport rental car companies would arrive at the Airport either via the entrances from Hollywood Way or Empire Avenue, and would leave the airport via the Hollywood Way exit or the driveway that leads west from the Hollywood Way / Avon Street intersection.

Rental cars currently parked on the B-6 Trust Property are shuttled to the Rental Ready Lot when needed, traveling through the Hollywood Way / Winona Avenue and Hollywood Way / Thornton Avenue intersections. The B-6 Trust Property Rental Car Lot would continue to be used for temporary rental car overflow parking, which is a permitted use in the M-2 Zone.

Rental cars are cleaned and serviced after every rental. Currently, the rental cars are shuttled from the Terminal South Lot to the maintenance area in the southwest quadrant of the Airport using westbound Empire Avenue and passing through the Empire Avenue / North Clybourn Avenue intersection. A returned rental car is serviced and then shuttled to either the Terminal South Lot (on the reverse path – Empire Avenue / North Clybourn Avenue intersection and eastbound on Empire Avenue) or the B-6 Trust Property (through the Empire Avenue / North Clybourn Avenue, Airport

Entrance / Empire Avenue, Hollywood Way / Thornton Avenue, and Hollywood Way / Winona Avenue intersections). If the rental car is parked on the B-6 Trust Property, the rental car is shuttled to the Terminal South Lot via the Hollywood Way / Winona Avenue and Hollywood Way / Thornton Avenue intersections. Under the A-1 North Property acquisition and development component of the proposed Project, most of the servicing of rental cars would occur on the A-1 Lot at the Quick Turn Around, and a rental car would remain on the A-1 Lot until it is ready for rental. Therefore, no routine service trips would occur that would use any of the intersections described above. For heavier maintenance, the rental car would be serviced at the maintenance area at the southwest quadrant of the Airport and then returned to be rented again. Maintenance trips to the southwest quadrant would use the driveway that leads west from the Hollywood Way / Avon Street intersection, the Hollywood Way / Empire Avenue intersection, and the Airport Entrance / Empire Avenue and Clybourn Avenue / Empire Avenue intersections. Return trips from the maintenance area to the rental car center on the A-1 property would use the Clybourn Avenue / Empire Avenue, Airport Entrance / Empire Avenue, and the driveway to the rental car center from the realigned Terminal Loop Roadway.

The overall effect of the A-1 North Property acquisition and development component of the proposed Project would be to reduce rental car-generated traffic on Hollywood Way between Thornton Avenue and the B-6 Trust Property, and to reduce maintenance-generated traffic on Empire Avenue between the Terminal South Lot and the maintenance area in the southwest quadrant of the Airport. In addition, the expected relocation of some off-airport rental car companies to the new facilities on the A-1 Lot would reduce trips by those companies' shuttle buses on roadways surrounding the Airport. The relocation also would eliminate two shuttle bus trips through Airport entrances and exits for each rental car customer pick-up and two trips for each rental car customer drop-off. In totality, the number trips through the Hollywood Way / Thornton Avenue and the Empire Avenue / Terminal Loop Roadway intersections would be reduced.

Effect of the Introduction of Premium Self-Parking in Proximity to the Airport Terminal. Premium self-parking spaces, not currently provided at the Airport, would be located on the current Rental Ready Lot (Terminal South Lot). As a result of the A-1 North Property acquisition and development component of the proposed Project, premium self-parking patrons would enter the airport either via the Hollywood Way entrance or Empire Avenue entrance, and would enter the premium self-parking lot via the entrance driveway from the southbound Terminal Loop Roadway. Patrons would leave the premium self-parking lot via the exit driveway onto southbound Terminal Loop Roadway, and would leave the Airport via the exits on either Hollywood Way or Empire Avenue. This component of the proposed project would not materially change traffic movements on Airport-area roadways.

Summary of Public Parking Spaces Changes. There currently are 7,534 public parking spaces for use by airport patrons who bring their vehicles to the Airport or on the A-1 North Property (exclusive of employee parking). Included in this number are 6,269 spaces near the terminal building (including the currently paved spaces of the A-1 North Property) and the 1,265 spaces on the B-6 Trust Property that are used for overflow valet parking. The valet parking on the B-6 Trust

Property is included because valet customers use the entrances to the Airport on Hollywood Way and Empire Avenue to drop off their vehicles for valet parking.

The proposed project imposes a maximum number of public parking spaces at on-Airport facilities to be 7,280 spaces (exclusive of the 631 employee parking spaces). This would be a decrease of 254 spaces compared to a baseline of 7,534 spaces. Under the proposed development agreement, the maximum number of public parking spaces at on-Airport facilities would be 7,280 spaces (exclusive of the 631 employee parking spaces). This would be a decrease of 254 spaces compared to a baseline of 7,534 spaces. A decrease of 254 spaces would not result in any significant traffic impacts.

Summary of Changes in Traffic Movements. On the basis of traffic data collected between June 2003 and January 2004 regarding critical movements, intersections in the Airport vicinity that would experience a change in vehicle trips as a result of the A-1 North Property acquisition and development component of the proposed Project currently operate at an acceptable Level of Service (LOS) C or better during the a.m. and p.m. peak traffic hours.² The reduction of approximately 1,200 vehicle trips through the Hollywood Way intersections with Thornon Avenue and Winona Avenue as a result of the eliminated of valet parking on the B-6 Trust Property and the reduction of vehicle trips associated with shuttling rental cars through the Empire Avenue / Terminal Loop Roadway intersection would more than offset the minimal increase in trips by long-term public parking patrons at intersections in the Airport vicinity. Therefore, the overall effect of the A-1 North Property acquisition and development component of the proposed Project would be to reduce traffic volumes on Airport area roadways. Thus, the effect on traffic conditions would be less than significant because the levels of service for the critical movements at the intersections in the Airport vicinity would remain acceptable (LOS C or better).

Cumulative Traffic. Traffic volumes would increase in the Airport vicinity due to cumulative development, including the following projects in the cities of Burbank and Los Angeles:

- A-1 North Zelman Restaurants Project (25,827 square feet)
- Media Studios North Office Development (525,155 square feet)
- Buena Vista / Empire Residential (310 multi-family units) and Retail (1,000 square feet)
- Burbank Empire Center Office Development (500,000 square feet)
- Voit Airport Commerce Center "Light Industry" Condominium Park (480,000 square feet)
- Trammell Crow Office Development (155,000 square feet)

² Level of service (LOS) is a qualitative assessment of the average motorist's and passenger's perceptions of traffic conditions. LOS generally is described in terms of travel delay, freedom to maneuver, and comfort and convenience. Methods to determine LOS apply quantifiable traffic measures such as intersection volume-to-capacity ratios to approximate driver satisfaction. These measures differ by roadway type because the user's perceptions and expectations vary by roadway type. A six-level rating scale has been established to describe levels of service, from LOS A (little or no delay) to LOS F (very lengthy delays). In accordance with the City of Burbank's significance threshold criteria, LOS D is the minimally acceptable service level.

The increased traffic volumes would cause the volume-to-capacity ratio to increase (and level of service to worsen) at intersections in the Airport vicinity, including the intersections of Hollywood Way / Thornton Avenue and Hollywood Way / Avon Street. However, as described above, the proposed Project would decrease traffic volumes traveling through area intersections because the need to shuttle valet cars and rental cars would be reduced or eliminated. Therefore, the proposed Project would not contribute to any worsening of cumulative traffic conditions. In total, the proposed Project would have a less-than-significant traffic impact.

Construction Period Effects. The construction phase of the A-1 North Property acquisition and development component of the proposed Project would result in temporary increases in traffic volumes on area roadways. This temporary increase is associated with the movement of construction workers and equipment used for the construction of the relocation of a portion of the Terminal Loop Roadway, a valet parking plaza and building, a rental car center customer building, a rental car center parking structure (one elevated level), and a rental car center quick turn around facility. Construction-related traffic would cause a temporary and intermittent lessening of the capacities of Airport area streets because of the slower movements and larger turning radii of construction trucks compared to passenger vehicles. Because construction-generated trips are expected to be spread more-or-less evenly throughout a construction workday, impacts on peak-hour traffic likely would be limited. To ensure that the traffic impacts during construction would not be significant, the Authority would require contractors to implement Mitigation Measure #5 (see Section XVII). Generally, these practices include implementation of a traffic control plan, which would include measures (e.g., critical construction that would otherwise create congestion is to be done after normal airport passenger terminal operating hours, advance warning signs, flaggers to direct traffic, and advance notification of interested parties about the location, timing, and duration of construction activity) to maintain safe and efficient traffic flow during the construction period. The effect on traffic conditions would be less than significant.

The realignment of the Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection could result in lane closures and some congestion during the construction period. These impacts would affect vehicle movements on the Terminal Loop Roadway only and not on any other street, such as Hollywood Way or Thornton Avenue. Given the relatively small amount of traffic on the Terminal Loop Roadway, the effect on traffic conditions on the Terminal Loop Roadway would be less than significant.

In addition, there would be no construction traffic impacts associated with the relocation of Lot A or the completion of Taxiway D because the construction of both of these project components would primarily involve paving or repaving and would require a minimal number of truck trips on a daily basis.

- c) The proposed Project would result a slight change in existing air traffic patterns associated with arriving and departing aircraft at the Airport as a result of the completion of Taxiway D. This would result in a more efficient use of the airfield and could result in the use of Runway 26 for more departures than what occurs under existing conditions (see Appendix A for details on the operational effects of the completion of Taxiway D). This would have a corresponding decrease in the use of Runways 15 and 33 for departures compared to existing conditions. However, this change

in air traffic patterns is limited only to the number of operations using specific runways and is not associated with any change in flight tracks associated with the use of these runways at the Airport.

- d) The A-1 North Property acquisition and development, the Lot A relocation, and the Taxiway D completion would neither change the overall physical characteristics of the street network surrounding the site, nor generate traffic that is incompatible with existing traffic patterns. The realignment of Terminal Loop Roadway west of the Hollywood Way / Thornton Avenue intersection would result in an improvement in the safety of the Hollywood Way / Thornton Avenue intersection. Therefore, the proposed Project would have a less-than-significant traffic safety and hazards impact.
- e) The various components of the proposed Project would not reduce the number of access points to the Airport as compared to the existing condition. Therefore, there would be no impact to emergency access.
- f) The proposed Project would not result in any reduction with respect to the amount of parking capacity available for Airport passengers and employees. Thus, the overall parking supply as a result of the proposed Project would be adequate to accommodate demand for parking at the Airport. Therefore, the proposed Project would have a less-than-significant parking impact.
- g) Buses currently provide service to and from the Airport throughout the day. No effects on the operation of those buses would occur as a result of the various components of the proposed Project. Therefore, the proposed Project would not interfere with adopted policies, plans, or programs supporting alternative transportation.

Issues (and Supporting Information Sources):	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---	--	---	----------------------

XVI. UTILITIES AND SERVICE SYSTEMS – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and | | | | |

resources, or are new or expanded entitlements
needed?

195

Issues (and Supporting Information Sources):	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---	--	---	----------------------

XVI. UTILITIES AND SERVICE SYSTEMS (cont.)

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
- a,b) The proposed Project would not affect wastewater generation or wastewater treatment. The only components of the proposed Project that would require wastewater services would be the valet building, the rental car center customer building, the existing car wash that would be used for valet car washing, and the car washing facility that would be provided as part of the QTA. These facilities would include restrooms as a convenience to valet parking patrons and rental car patrons and are not expected to result in increased generation of wastewater above what is currently generated at the Airport. The car washing activity that would take place at the rental car center would offset and replace the same number of car washes that would take place in current facilities, including the existing rental car maintenance facility and other off-airport rental car washing facilities. In addition, the car washing at the new rental car center would use recycled water as part of the operations. Therefore, the proposed Project would not result in an increase in the amount of wastewater generated.
- c) Stormwater facilities already exist at the Airport, on the A-1 North Property, and on the Adjacent Property. It is anticipated that no new infrastructure would be required since these areas have historically been covered with impervious surfaces. However, the Authority would be required to comply with the Standard Urban Stormwater Mitigation Plan (SUSMP) for Los Angeles County and Cities in Los Angeles issued by the Regional Water Quality Control Board. Compliance with the SUSMP would ensure that there are adequate storm water drainage facilities to accommodate runoff at the Airport and that no significant environmental impacts would occur (see Section VIII.a, above).
- d) Because the number of valet car patrons and rental car patrons would not change as a result of the proposed Project, the water supplies to the various components of the proposed Project would not be greater than those quantities that are currently provided (see Section XVI.a,b, above). This would be no impact in this regard.

- e) The Authority provides restroom facilities for valet parking employees and patrons and for rental car employees and patrons (see Section XVI.a,b, above). These services generate a nominal amount of wastewater. Since the Authority currently provides these facilities, there would not be any additional burden placed on wastewater collection services above and beyond current conditions. Since these facilities currently exist and no additional services are included within the proposed Project, this would be no impact in this regard.
- f,g) The proposed Project does not have the potential to significantly increase or decrease the production of solid waste. Any existing solid waste collection facilities would continue to remain following the completion of the various components of the proposed Project. No additional solid waste generation would occur relative to existing conditions. Therefore, there would be no impact to landfills or solid waste requirements.

XVII. MITIGATION MEASURES

Mitigation Measure #1: Construction-Related Air Pollutant Emissions

The Authority shall require contractors to comply with the following best management practices to reduce pollutant emissions during construction activities.

- All off-road equipment shall be well-tuned and regularly serviced to minimize exhaust emissions. A regular and frequent check-up and service/maintenance program shall be established for all equipment used during construction.
- Ultra-low sulfur fuel (with low sulfur and low aromatic content) in combination with a fuel additive (such as Puri-NO_x) shall be used in all diesel-powered off-road equipment to minimize NO_x emissions. Products such as this can reduce NO_x emissions by roughly 14 percent.
- The injection timing on all diesel-powered equipment shall be retarded to minimize NO_x emissions.
- Electrically-powered equipment, or equipment fueled by an alternative, less-emitting fuel (e.g., liquefied natural gas [LNG] or compressed natural gas [CNG]) shall be used, as feasible. Use of alternative fuel engines can be expected to achieve a reduction in NO_x emissions of at least 37 percent.

Mitigation Measure #2: Construction-Related Cultural Resource Impacts

Pursuant to CEQA Guidelines 15064.5 (f), the Authority shall institute "provisions for historical or unique archaeological resources accidentally discovered during construction". Therefore, in the event that any prehistoric or historic subsurface cultural resources are discovered during ground disturbing activities, all work within 50 feet of the resources shall be halted and the project proponent and/or lead agency shall consult with a qualified archaeologist or paleontologist to assess the significance of the find. If any find is determined to be significant, representatives of the project proponent and/or lead agency and the qualified archaeologist and/or paleontologist would meet to determine the appropriate avoidance measures or other appropriate mitigation, with the ultimate determination to be made by the County. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and a report prepared by the qualified archaeologist according to current professional standards.

If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out.

In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken:

- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and

If the coroner determines the remains to be Native American:

The coroner shall contact the Native American Heritage Commission within 24 hours.

The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.

The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or

- Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.

The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.

The descendant identified fails to make a recommendation; or

The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Mitigation Measure #3: Construction-Related Soil and Erosion Control

The Authority shall require contractors to comply with the following best management practices to reduce impacts due to soil loss and erosion during construction activities.

- As grading progresses, erosion control and protective devices shall be removed or installed as needed to minimize risk of sediment discharge from the site. Site perimeters shall be protected with sandbags, silt fence or other acceptable best management practices. Debris and mud will be contained within the site, and may not be transported from the site via sheet flow, swales, area

drains, natural drainage courses or wind. Active storm drain inlets and outlets will be protected to prevent potential pollutants from discharging the site.

- Construction site to be inspected at 40% prediction of rain, every 24 hours during extended rain events, and within 24 hours after each storm event to ensure that all best management practices and devices are functional, and to determine maintenance needs. No potential pollutants shall be allowed to be discharged offsite or into drains. A contingency stormwater sampling plan, and sample kits shall be onsite, or at a nearby location.
- Materials containing potential pollutants shall be protected from contact with stormwater, any accidental spill of a potential pollutant shall be contained and cleaned up promptly to prevent discharge from site.
- Equipment maintenance activities shall be performed in the designated areas onsite.
- Water trucks shall be used as needed, to minimize fugitive dust.
- Active construction entrance driveways will be stabilized to minimize dirt or mud being tracked into public streets. Street sweepers, broom sweeping or approved best management practices shall be used as needed to clean up dirt which enters public streets.
- Stockpiles of dirt or sand will not be allowed to discharge from the site, via wind or exposure to stormwater.
- Completed slopes over 5 feet high shall be stabilized with any of the following: copolymer, hydroseed material, jute netting, earthguard, or other accepted best management practice measures.
- Designated concrete washout stations will be used onsite for all concrete waste water.

Mitigation Measure #4: Construction-Related Hazardous Materials

- a) Prior to commencement of excavations exceeding 10 feet in depth, the Authority will conduct focused investigations of the areas to be graded. If soil is determined to be contaminated, it shall be cleaned or excavated as necessary to complete the work and shall be disposed only at a facility permitted to take such soil.
- b) If, during the execution of any grading contemplated by the scope of work, suspected hazardous materials, odors, liquids, or other substances are encountered, the contractor is to immediately contact the Authority for direction before proceeding in the suspected area of contamination. No work shall continue unless and until the suspected material is tested for contamination. If soil is determined to be contaminated, it shall be cleaned or excavated as necessary to complete the work and shall be disposed only at a facility permitted to take such soil.

Mitigation Measure #5: Construction-Related Traffic

The Authority shall require contractors to comply with the following best management practices to reduce impacts related to construction traffic.

- Schedule critical construction activities at times other than during normal airport passenger terminal operating hours.
- Post advance warning signs to notify drivers of construction activities.
- Use flaggers to direct traffic, as needed.
- Provide advance notification to all parties within 500 feet about the location, timing, and duration of construction activity.
- Coordinate with the City as appropriate to avoid or minimize construction related impacts on City streets.

Issues (and Supporting Information Sources):	<u>Potentially Significant Impact</u>	<u>Less Than Significant With Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
--	---	--	---	----------------------

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulative considerable? ("Cumulative considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a) Due to the history of development over the past 70 years at the Airport and in the Airport vicinity, there is no potential to degrade the quality of the environment in terms of impacts on biological resources (see Section IV, above). | | | | |
| b) The less-than-significant impacts associated with the proposed Project are limited in geographic area and scope. The proposed Project would not contribute to any cumulative impacts associated with other projects in the Airport vicinity. Since all potential impacts would be temporary or of limited geographic area, the proposed Project does not have impacts that would be cumulatively considerable. | | | | |

- c) With the implementation of the identified mitigation measures, the proposed Project would not result in any adverse construction-related impacts to human beings. The operational impacts associated with air quality, noise, hazardous materials, traffic, and public services and utilities do not exceed any established significance thresholds and would not be considered significant.

APPENDIX A

Bob Hope Airport Analysis of Completion of Taxiway D

INTRODUCTION

This appendix provides an overview of the existing operational conditions and the anticipated changes at Bob Hope Airport (Airport) resulting from the proposed completion of Taxiway D.

In preparing this analysis, a site visit was conducted and a number of interviews took place with Burbank-Glendale-Pasadena Airport Authority (Authority) staff, FAA air traffic control staff, and operations staff. Additionally, a number of studies and data that were provided by the Authority were reviewed.

BACKGROUND

The Airport has been long known as the most convenient airport for the North Los Angeles area and the closest airport to downtown Los Angeles. Currently, six major air carrier airlines operate at the Airport with Southwest Airlines being the largest in terms of operations and passengers. In addition, the Airport is home to over 117 based general aviation aircraft and cargo service is provided by Fed Ex, UPS and Ameriflight. In 2003, the Airport served just over 178,000 aircraft operations on its two intersecting runways, Runway 8-26 and Runway 15-33. Activity is projected to increase at the Airport to approximately 187,000 operations by 2008 according to the revised projections using the average annual growth rates calculated as part of the Landrum and Brown FAR Part 161 study.

The Airport has identified a number of improvements that will enhance efficiency, safety and security at the airport. One of these projects is to complete Taxiway D from Taxiway A to the end of Runway 26. This project is necessary to improve taxi flow on the airfield, reduce runway crossings, provide a more manageable workload for air traffic controllers, and enhance the safety and security around the terminal and aircraft parking area.

EXISTING AIRFIELD OPERATIONAL CHARACTERISTICS

To understand how the Airport currently operates, a number of operational characteristics were reviewed. This review provided an existing condition for the Airport against which changes associated with the proposed completion of Taxiway D could be identified.

Airfield Restrictions

A number of older civilian airports, especially those built in the 1930s and 1940s, have airfield restrictions that often limit their ability to operate efficiently. Many of these airports, initially designed to handle propeller driven aircraft, now must accommodate larger, faster jet aircraft to keep up with the ever-changing fleets of the airlines. Unfortunately, due to surrounding development, land space and cost constraints, the expansion options for these airports are limited and often require a variety of restrictions

be put in place to safely handle the desired aircraft. The Airport has a number of airfield operational restrictions that are outlined below:

- Taxiway B – Restricted to aircraft with wingspans of 79 feet or less which is limited to Aircraft Design Group (ADG) II.
- Taxiway G – Restricted to aircraft with wingspan of 95 feet or less, which includes some ADG III aircraft and all ADG I and II aircraft.
- Taxiway A – Restricted to ADG IV aircraft with wingspans of 171 feet or less.
- Air Carrier Non-Movement Taxilane – Only aircraft with wingspans less than 117 feet 5 inches are authorized to taxi between gates A9 and B5, up to the hold short lines for Runway 15-33. Aircraft with wingspans less than 113 feet are authorized to taxi the entire length of the Non-Movement area and may taxi past the end of this non-movement taxilane that terminates abeam Gate B3 for the purpose of parking at Gate B3 only. Aircraft with a wingspan that exceeds 95 feet and are taxiing past Gate B3 to Gate B2 occupy Runway 15-33 until parked at Gate B2 and require air traffic control clearance of Runway 15-33 to proceed to Gate B2. Runway 15-33 also is considered occupied whenever aircraft with a wingspan exceeding 95 feet are pushing back from Gate B2. Any aircraft taxiing past Gate B2 to park at Gate B1 occupies Runway 15-33. Runway 15-33 also is occupied whenever aircraft are pushing back from Gate B1 for taxi outbound. The only exception is an aircraft with a wingspan less than 70 feet such as the Canadair Regional Jets (CRJs).
- No aircraft with a wingspan that exceeds 95 feet is authorized to taxi past gate B3 to gate B2 when Runway 15-33 is in use.
- Runway 8 is closed to all departing multi-engine aircraft weighing over 12,500 pounds.

These airfield restrictions limit the ability of air traffic to handle aircraft on the ground efficiently, especially with the lack of a full-length parallel taxiway on the north side of Runway 8-26.

Taxiway Flows

The Airport serves a variety of users, including passenger airlines, cargo and general aviation traffic. The passenger terminal facility is located in the southeast quadrant of the airport. The “L” shaped terminal has a total of 14 aircraft parking positions with the only airside access to this facility provided by the air carrier non-movement taxilane.

Cargo facilities are primarily located in the southwest quadrant of the Airport with some small package cargo handled at Mercury Air Center in the northwest quadrant. The cargo facilities used by the large cargo aircraft of Fed Ex and UPS are located between Taxiway C7 and C6 on the southwest side of the airport. These facilities are closest to the end of Runway 33 and airside access to these facilities is via Taxiway C. Cargo facilities operated by Ameriflight, the nighttime bank note and check haulers, are located closer to the end of Runway 8, adjacent to Taxiway C8 in the southwest quadrant. Airside access to the Ameriflight facility also is via Taxiway C.

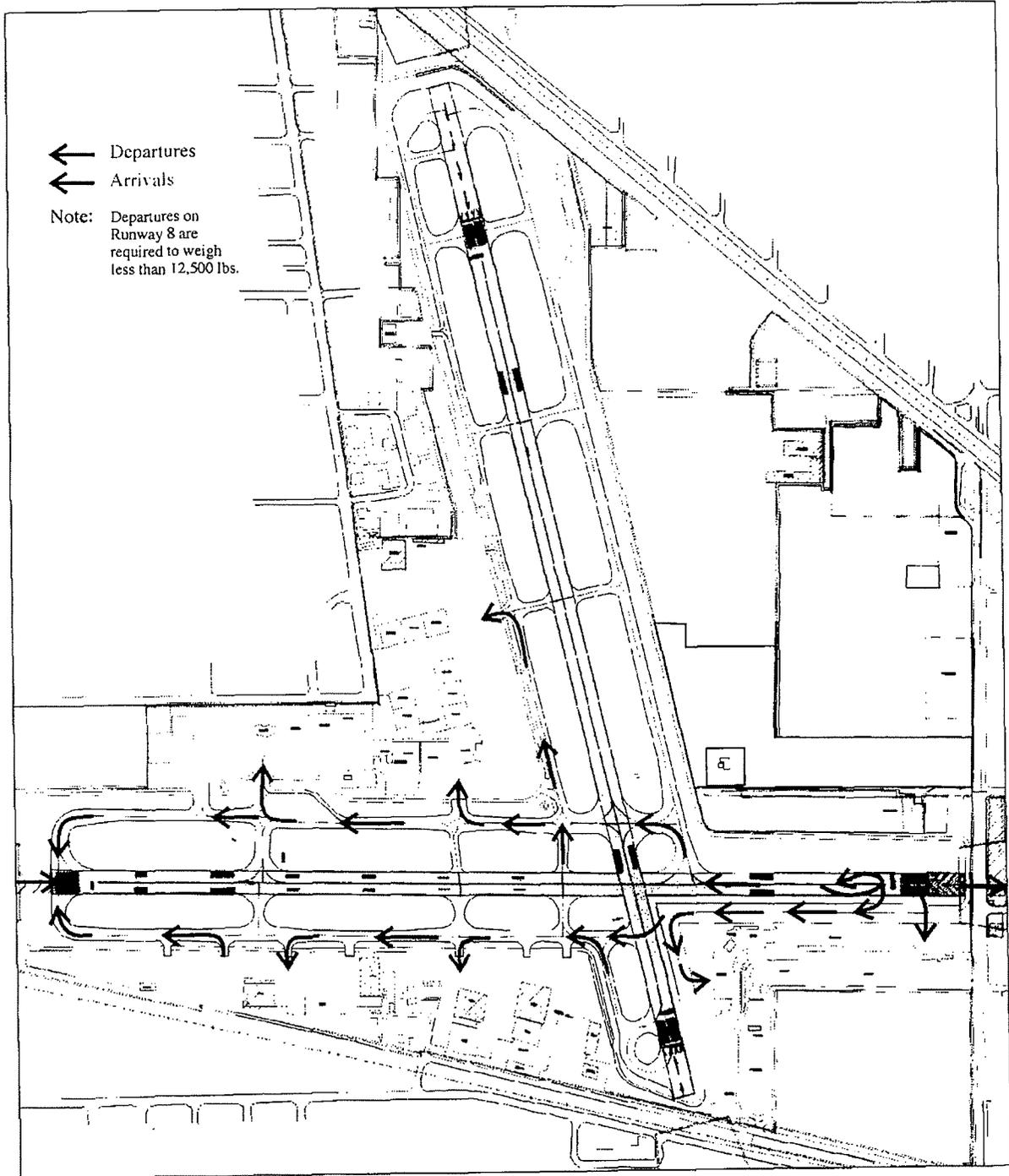
The majority of general aviation facilities are located in the northwest quadrant between Taxiway D8 and B2. These facilities include the two large fixed base operators (FBOs) Mercury Air Center and Million Air Burbank, as well as a number of airport tenants that lease hangars directly from the Authority. They also include a large aircraft parking

apron as well as a number of hangar facilities. Airside access to these facilities is provided by either Taxiway D or Taxiway B. Additional general aviation facilities also are located in the southwest quadrant, just west of Taxiway C8.

The taxi flow (the directional movement of aircraft on the ground) at the Airport depends largely on the current runway use. In addition, the type, size and weight of the aircraft operating at the Airport also will influence the taxi flows due to the operational airfield restrictions discussed prior. Due to the restrictions in the terminal area with the non-movement taxilane, the current fleet of commercial air carrier aircraft serving the Airport passenger terminal all have wingspans at or less than 117' 5".

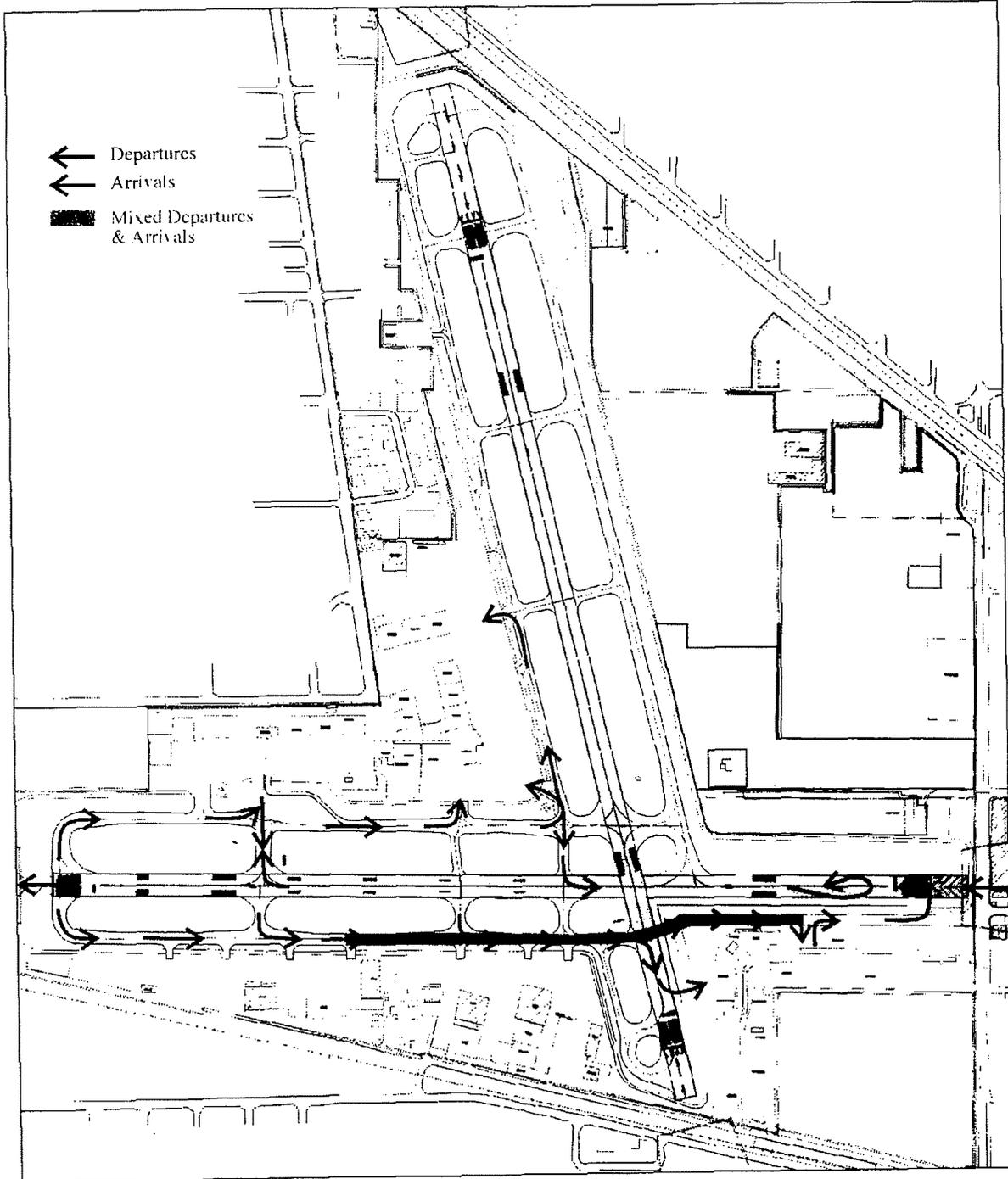
Figure A-1 depicts how the airfield currently operates in terms of taxi flows when aircraft arrive and depart on Runway 8. The red arrows show the taxi direction of arrival aircraft and how the larger aircraft (aircraft with wingspans larger than 117 feet 5 inches) must turn around on Runway 8 and back taxi on the runway across Runway 15-33 to the northwest or southwest quadrants. This back taxiing maneuver closes operations to Runway 8 until the aircraft is clear of the runway. If the arrival aircraft has a wingspan of less than 117 feet 5 inches, it can turn off the runway onto the non-movement taxilane and turn directly into gates A9 through A1 and B5. If the aircraft is taxiing to gates B1 through B4, it must abide by the restrictions outlined above. Depending on how congested the terminal area is, and how many aircraft are on final approach to Runway 8, air traffic may route general aviation traffic onto the non-movement taxilane to quickly release the runway for another landing aircraft, or they will have them back taxi on the runway if there is sufficient separation and time to safely back taxi. The blue arrows show the departing aircraft taxi flows for Runway 8. The majority of these aircraft will be taxiing from either the northwest or southeast quadrant. Due to the operational restrictions for departures on Runway 8, only aircraft weighing less than 12,500 lbs can takeoff using this runway. All other aircraft must use Runway 26 or Runway 15-33 for departures.

Figure A-2 depicts the airfield currently operates in terms of taxi flows when aircraft arrive and depart on Runway 26. The red arrows show the taxi direction of the arriving aircraft on Runway 26 and the blue arrows show the departures. The green shading shows a potential mix of departure and arrival aircraft as well as a mixing of general aviation and air carrier aircraft on the non-movement taxilane. Once again, aircraft with the larger wingspans, over 117 feet 5 inches, are required to back taxi on the runway and can not use the non-movement taxilane. Figure A-2 shows the potential for congestion that occurs in the terminal area with aircraft taxiing to the Runway 26 end for departures, aircraft backing out of the terminal gate positions, aircraft pulling into terminal gate positions, ground service vehicles (aircraft refuelers, baggage carts, catering, maintenance vehicles, aircraft tugs, etc) using the taxilane to travel around the terminal building, and the mixing of general aviation traffic on the passenger air carrier taxilane. All of these activities in the terminal area are occurring in an area which is not controlled by the air traffic control tower. Pilots, airline workers, ground service vehicles operate at their own discretion with air traffic only advising not controlling the ground movements in this area.



SOURCE: Environmental Science Associates

Development Agreement and Related Actions / 204014 ■
Figure A-1
 Existing Taxi Flows When Aircraft Arrive
 and Depart on Runway B



SOURCE: Environmental Science Associates

Development Agreement and Related Actions / 204014 ■

Figure A-2
Existing Taxi Flows When Aircraft Arrive
and Depart on Runway 26

In-trail separation

In-trail separation is the distance aircraft must keep between themselves and an aircraft on the same flight path when transiting to or from a runway. This separation not only applies to arrivals and departures but also applies to in-flight activities. Typically in-trail separation for arriving aircraft is 3 to 4 miles between aircraft arriving on the same runway. For Runway 8 at the Airport, 3 to 4 miles separation is the standard for aircraft with wingspans smaller than a B757. Aircraft with wingspans equivalent to the B757 or larger and are arriving on Runway 8, requires air traffic control to automatically apply an 8 mile in-trail separation to allow enough time for the aircraft to back taxi on the runway and clear to the taxiway before the next aircraft lands. Additionally, if a prop or turbo prop type general aviation aircraft follows an aircraft the size of a B757 or larger for landing, an eight mile in-trail separation is typically used for wake vortex. When Runway 8 is the active runway, air traffic control workload at the Airport is high and inefficient compared to other facilities of the same size due to the lack of a functional taxiway exit and full length parallel taxiway with the ability to accommodate all aircraft types. Runway 8 is the only runway with a precision approach at the Airport and it is the preferred runway for landing. Once an aircraft has landed and is using the non-movement taxilane, air traffic control must confirm through visual reference that aircraft on the non-movement taxilane is tracking the taxilane centerline or air traffic control must have any aircraft on final approach "go around" and abort the landing. According to air traffic control, Runway 8 averages four to five go arounds per week caused by the runway back taxi operation or aircraft not following the non-movement taxilane centerline. These unexpected go arounds place an additional strain on the controllers and facilities around the Airport.

Runway Use

The runway use splits that were used in the FAR Part 161 study, conducted by Landrum and Brown in June of 2002, were reviewed and confirmed in determining runway utilization in 2003. Runway utilization is usually dictated by wind direction because aircraft will normally land and takeoff into the wind to enhance the lift characteristics of their aircraft. It is also important because it greatly influences taxi flows and ground operations at the airport. Table A-1 shows the combined (air carrier, cargo and general aviation) runway use percentages based on a typical average day.

Runway	Percentage
08	49.9%
15	40.3%
26	3.8%
33	6.0%

According to discussions with airport staff an estimated 75% of air carrier landings occur on Runway 8 while it is estimated that over 90% of air carrier departures occur on Runway 15. Based on the standard operating procedures for some of the airlines and cargo carriers, company policies prefer their pilots to land on the runway with the lowest minimums available and depart on the longest runway if conditions are favorable. This

seems to hold true at the Airport when looking at the overall runway use percentages. Airline departures using Runway 26 are not typical. However, morning flights by Southwest Airlines have used this runway when wind conditions are right to minimize noise impacts and expedite their departure.

Santa Ana winds, which come from the northwest in the winter, typically change the operating characteristics of the Airport. Under normal conditions, Runway 8 will be used primarily for arrivals while Runway 15 will be used primarily for departures with arrivals sequenced in when adequate separation of aircraft can be provided. This is often reversed with Santa Ana wind conditions. During these periods, the majority of arrivals use Runway 33 with some on Runway 26. Departures are split between the two runways depending on aircraft performance and the need for certain aircraft to operate on the longer runway.

Commercial and GA interactions

Air carrier and general aviation operations mix at the Airport with the use of shared facilities such as runways and taxiways. This mixing of operations is not unlike many airports across the United States that serve all types of aviation activity. One potential safety and security concern is the mixing of these types of activity on occasion on the air carrier taxiway that abuts the air carrier parking apron. The air carrier apron is a busy area during peak times of the day with aircraft, ground service equipment, fuel trucks, people, and small general aviation aircraft. Aircraft/Ground vehicle incursions occasionally do occur at the Airport and this area has the potential to have more of these types of incidents as traffic continues to grow as projected. According to the National Transportation Safety Board (NTSB) aircraft/ground vehicle incursions are a top safety concern they would like to see addressed through future airfield improvements.

PROPOSED ACTION AND OPERATIONAL IMPLICATIONS

Project Overview

The proposed completion of Taxiway D would connect Taxiway D at the Taxiway A-4 exit to the end of Runway 26. This portion of the completed Taxiway D would have the same runway to taxiway centerline separation as the existing Taxiway D from the Runway 8 end to the intersection of Runway 15-33. The completion of Taxiway D would meet the design criteria (width, strength, marking, lighting, etc) of ADG IV type aircraft. Overall, the Taxiway D completion would be approximately 1,650 feet in length and once operational, it would provide for a full-length parallel taxiway on the north side of Runway 8-26.

One of the features of a completed Taxiway D would be pavement that is wide enough at the eastern end of the taxiway to permit aircraft to pass each other and eliminate any unnecessary queuing or idling on the taxiway, as well as provide flexibility for air traffic control to alter the departure sequence of aircraft without having to back-taxi aircraft onto a runway.

Changes in airfield restrictions

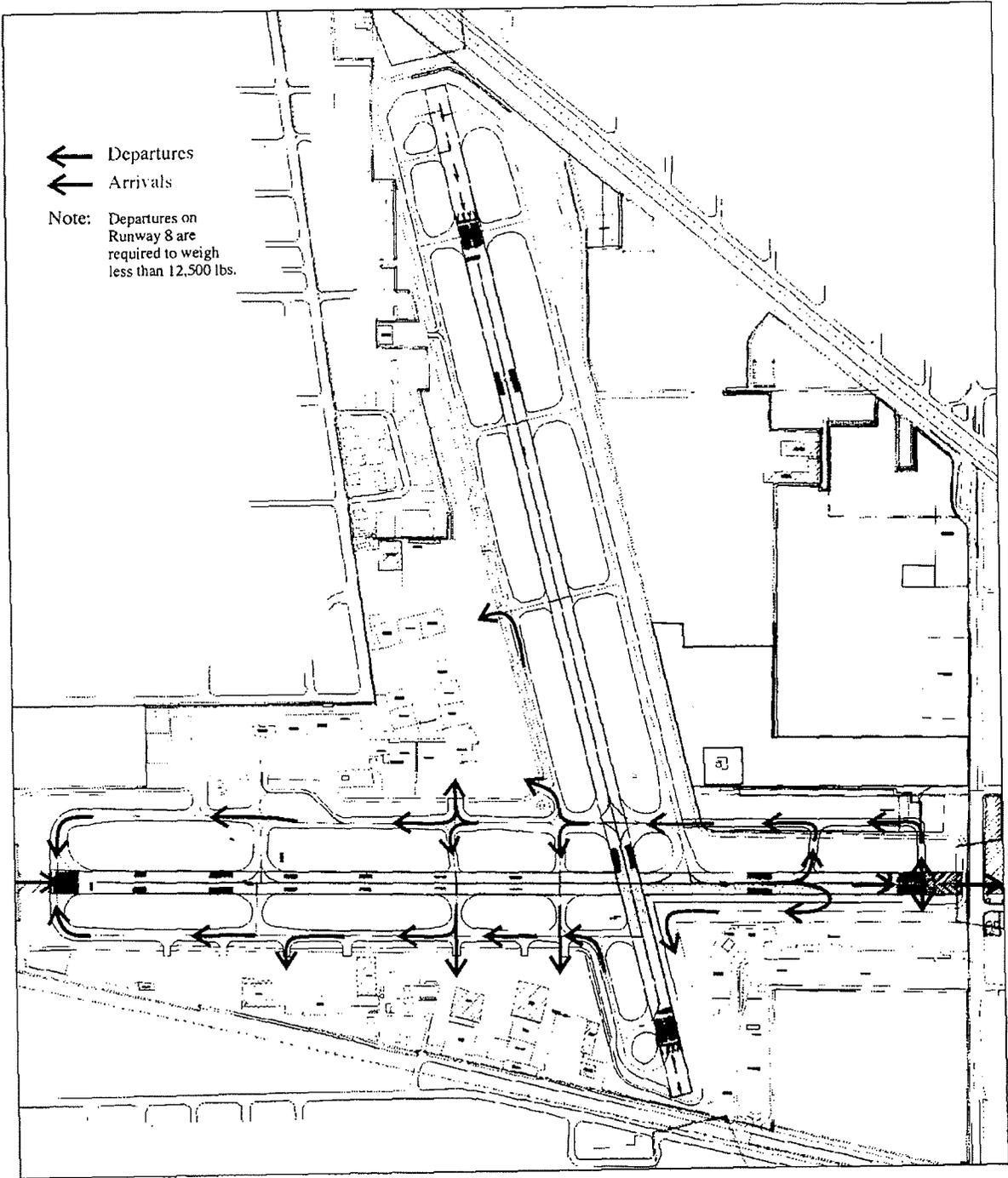
Based on the initial planning and preliminary layout of the completion of Taxiway D, no changes in the airfield operational restrictions are anticipated. Implementation of this project would make it easier for air traffic to coordinate the movement of aircraft on the ground with all of the current restrictions and would allow for more flexibility in taxiing aircraft across the airfield. This is especially true when operations require the use of Runway 26 for departures.

Changes in taxiway flows

The biggest change with the completion of Taxiway D is how aircraft ground movements would be affected. During daytime and evening hours, general aviation operations that land on Runway 8 or takeoff on Runway 26 generally use Runway 8-26 for taxiing and back-taxiing purposes. On occasion, they will use the non-movement taxilane for access to and from Runway 8-26 depending on taxilane congestion and aircraft on final approach to Runway 8-26. During nighttime hours after commercial air carrier operations have finished their scheduled operations, other general aviation and small cargo aircraft that desire to depart on Runway 26 use the non-movement taxilane to move across the airfield. The proposed taxiway would eliminate the need for general aviation and small cargo aircraft to use the runway for back-taxiing or the non-movement taxilane, which would reduce the amount of aircraft traffic through an already very busy area. This would improve safety and help reduce the potential for aircraft/vehicle incursions, as well as enhance security around the terminal and the parked air carrier aircraft. The completion of Taxiway D also would reduce the number of go arounds and aborted landings. According to air traffic control, last summer was a particularly difficult period in controlling ground movements at the Airport due to the storms in the east that would cause lengthy delays for departing aircraft. Air traffic control had no problem getting incoming aircraft on the ground but once on the ground there were very few places to have these aircraft wait until their gates became available. The completion of Taxiway D would allow air traffic control to have better queuing and sequencing of aircraft into the terminal and gate area.

Figure A-3 depicts the completion of Taxiway D and how aircraft movements are anticipated to occur with arrivals and departures occurring on Runway 8. The following outlines the possible changes with the operational flows on the airfield:

- Eliminates the need for aircraft landing on Runway 8 to make a 180 degree turn on the runway and back taxi down Runway 8-26 to taxi to the northwest or southwest quadrants of the airfield.
- Allows for segregation of general aviation and cargo aircraft from the air carrier passenger aircraft on the non-movement taxilane.
- Helps to eliminate head to head taxi operations and provides for a more efficient ground movement operation.
- Reduces air carrier aircraft congestion on the non-movement taxilane by allowing aircraft to taxi across Runway 8-26 on to Taxiway D and up Taxiway A instead of taxiing down Runway 8-26 or down the taxilane to Taxiway A.
- Reduces the number of go-around, therefore reducing the overall number of approaches to the Airport.



SOURCE: Environmental Science Associates

Development Agreement and Related Actions / 204014 ■

Figure A-3
 Taxi Flows When Aircraft Arrive and Depart on Runway 8 After Completion of Taxiway D

Figure A-4 shows how operations are anticipated to occur on Runway 26 (arriving and departing) upon completion of Taxiway D. The following taxi flow changes could include:

- Eliminates potential head to head taxi operations between arrival aircraft and departing aircraft.
 - Reduces congestion on the non-movement taxilane for aircraft using Runway 26 for departures by rerouting them to the north side of the airfield along Taxiway D.
 - Eliminates back taxiing down Runway 26 for aircraft with larger wingspans (over 117' 5") and eliminates a 180 degree turn for departures to the west.
- Reduces runway crossing from two down to one via Taxiway D for aircraft taxiing from the northwest quadrant to depart on Runway 26.

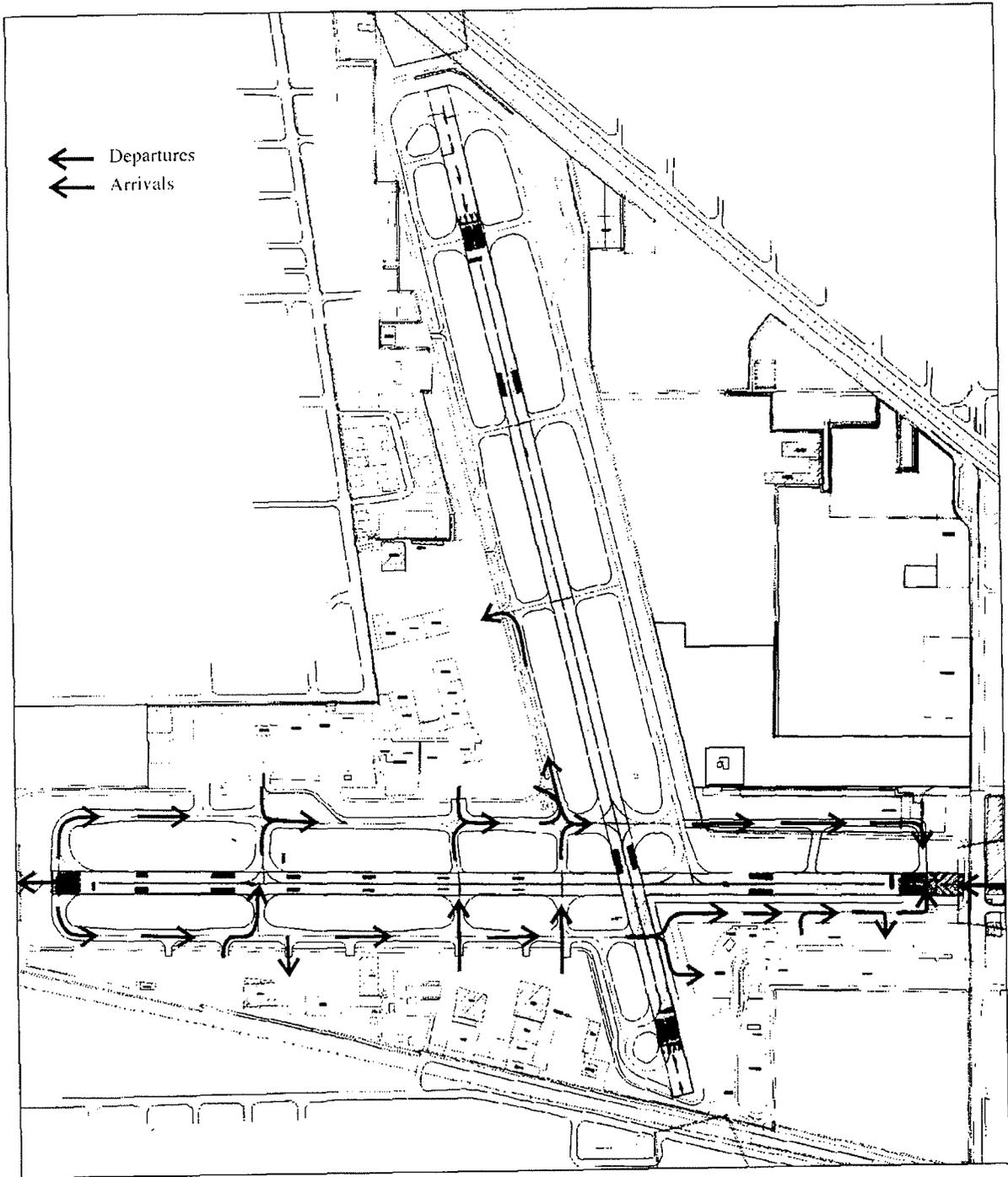
Changes to In-trail separation

With the completion of Taxiway D, aircraft with larger wingspans (B757 and larger) would have the ability to taxi to the west side of the airfield using Taxiway D without back taxiing on the runway. This would allow air traffic to provide 3 to 4 mile in-trail separation to all aircraft with an ADG IV designation or smaller. Any aircraft over an ADG IV designation, such as the B747 or A340 (which land at the Airport only in emergency situations) would still require more than a 4 mile in-trail separation for arrivals. The proposed completion of Taxiway D would allow both runways, Runway 8-26 and Runway 15-33 to operate more efficiently in terms of aircraft separations and it would help in reducing air traffic control workload.

CAPACITY IMPLICATIONS

Operational Capacity

An airport's operational capacity is typically referred to by the Federal Aviation Administration (FAA) as its annual service volume (ASV). It is defined as "a reasonable estimate of an airport's annual capacity" which "accounts for differences in runway use, aircraft mix, weather conditions, etc., that would be encountered over a year's time." An airport's ASV is dependent on the number of runways available, the configuration of the runways, the access provided to and from the runways, the wind and weather conditions at the airport, and the demand profile of the airport. In the case of the Airport, additional controls are in place governing the type of new commercial jet aircraft allowed to use the Airport based on existing noise rules. Since all other factors remain the same, the access provided to and from Runway 8-26 is the primary capacity consideration relative to the completion of Taxiway D. Good runway to taxiway access minimizes the time that an aircraft operation blocks the runway, which makes the runway available more quickly for a subsequent arrival or departure. A runway with a full length parallel taxiway and appropriately placed taxiway exits allows for the specific type of aircraft operating at the airport to exit the runway quickly upon completing its landing rollout. A runway without a full length parallel taxiway may require that an aircraft back taxi on the runway to either access the runway end for departure or to exit the runway upon landing. This increases the time that the runway is unavailable for a subsequent operation.



SOURCE: Environmental Science Associates

Development Agreement and Related Actions / 204014 ■

Figure A-4
 Taxi Flows When Aircraft Arrive and Depart
 on Runway 26 After Completion of Taxiway D

212

The proposed completion of Taxiway D to the east both parallel to and north of Runway 8-26 would have no impact on the operational capacity of the airfield. The existing parallel taxilane located to the south of Runway 8-26 already provides access to the full length of the runway and accommodates both Runway 8 arrivals and Runway 26 departures. The only aircraft currently restricted to access this taxilane are the four to five daily cargo operations by aircraft with larger wingspans (Boeing 757 and Airbus 300/310) and the single business jet B757 that is based at the Airport. When these aircraft land on Runway 8, they must back taxi to the west on the runway past the Runway 15-33 intersection before exiting to the parallel taxiway, Taxiway C. Taxiway C provides increased clearance over that available with the parallel taxilane and can accommodate these larger aircraft. The proposed extension of Taxiway D would allow these larger aircraft to exit Runway 8 to the north without the need to back taxi on the runway. This would reduce the time that the aircraft occupy the runway and release it for use by another operation. However, as all of these activities occur during off-peak periods at the airport when plenty of excess capacity exists, the demand profile of the airport would remain unchanged and thereby result in no increase in the Airport's ASV. Additionally, since Runway 15-33 is available for activity during the back taxi operation, the addition of the parallel taxiway merely increases flexibility in runway use.

Airspace Capacity

The Airport is located in proximity to three airports that influence activity into and out of the airport. The first two are located within Burbank's secondary Class C airspace boundary. Whiteman Airport is located just to the northwest and influences activities on Runway 15-33. Van Nuys Airport, which is located just west of the Airport and under the ILS approach path to Runway 8, has the greatest impact on operations at the Airport requiring close coordination between the two airports. The third airport, Los Angeles International (LAX), is the area's largest commercial service airport. While LAX lies approximately 15 miles to the south, its associated flight tracks pass near Burbank's location going into and out of the area.

Little or no increase in airspace capacity would result from the proposed completion of Taxiway D since the airspace benefits occur during off-peak periods. Under normal circumstances, the in-trail separation of aircraft is already the minimum attainable during VFR and IFR conditions. However, when larger aircraft are operating on the runway (during off peak periods), the parallel taxiway would allow these aircraft to exit the runway more quickly and reduce the subsequent in-trail separation requirements. The approximately four to five missed approaches that occur each week due to the existing back taxi operations required to accommodate aircraft landing on Runway 8 could be reduced as a result of the completion of Taxiway D, which improve the operational efficiency of the airspace.

RAMP AND TERMINAL CAPACITY

The proposed completion of Taxiway D would shift any general aviation (GA) activity from the taxilane to Taxiway D as GA aircraft transit to or from the northwest quadrant of the Airport. While this would shift some activity off of the parallel taxilane in the vicinity of the terminal, it would not increase aircraft apron or terminal area capacity. Rather, it would allow for a more efficient sequencing of commercial aircraft as they transit to and from the aircraft apron.

SUMMARY OF FINDINGS

The construction of the proposed completion of Taxiway D would provide the Airport greater flexibility and operational efficiency, especially during peak times, as well as enhance the overall safety of the airfield. In addition, the completion of Taxiway D would:

- Reduce runway crossings for general aviation aircraft using Runway 8-26.
- Reduce congestion on the apron edge taxilane by reducing the number of aircraft using this taxilane for ground operations and redirecting some of the ground movements.
- Reduce controller workload for in flight arrivals and departures as well as ground movements.
- Reduce the amount of time aircraft spend on the runways back taxing, positioning and using to transverse the airfield.
- Reduce the potential for "go arounds"
- Eliminates general aviation aircraft from taxiing on or near the apron edge taxilane and passenger terminal.
- Have no effect on overall airport capacity.
- Increase the potential for general aviation aircraft to use Runway 26, the preferred nighttime departure runway.

APPENDIX B

Bob Hope Airport Discussion of Existing and Proposed Traffic Movements

The following is a discussion of the existing and proposed traffic movements at Bob Hope Airport. This discussion is intended to provide information regarding the distribution of traffic and does not provide any information with respect to the number of vehicles on various roadways and at various intersections.

VALET PARKING PATRONS

Current movements for cars of patrons using valet parking.

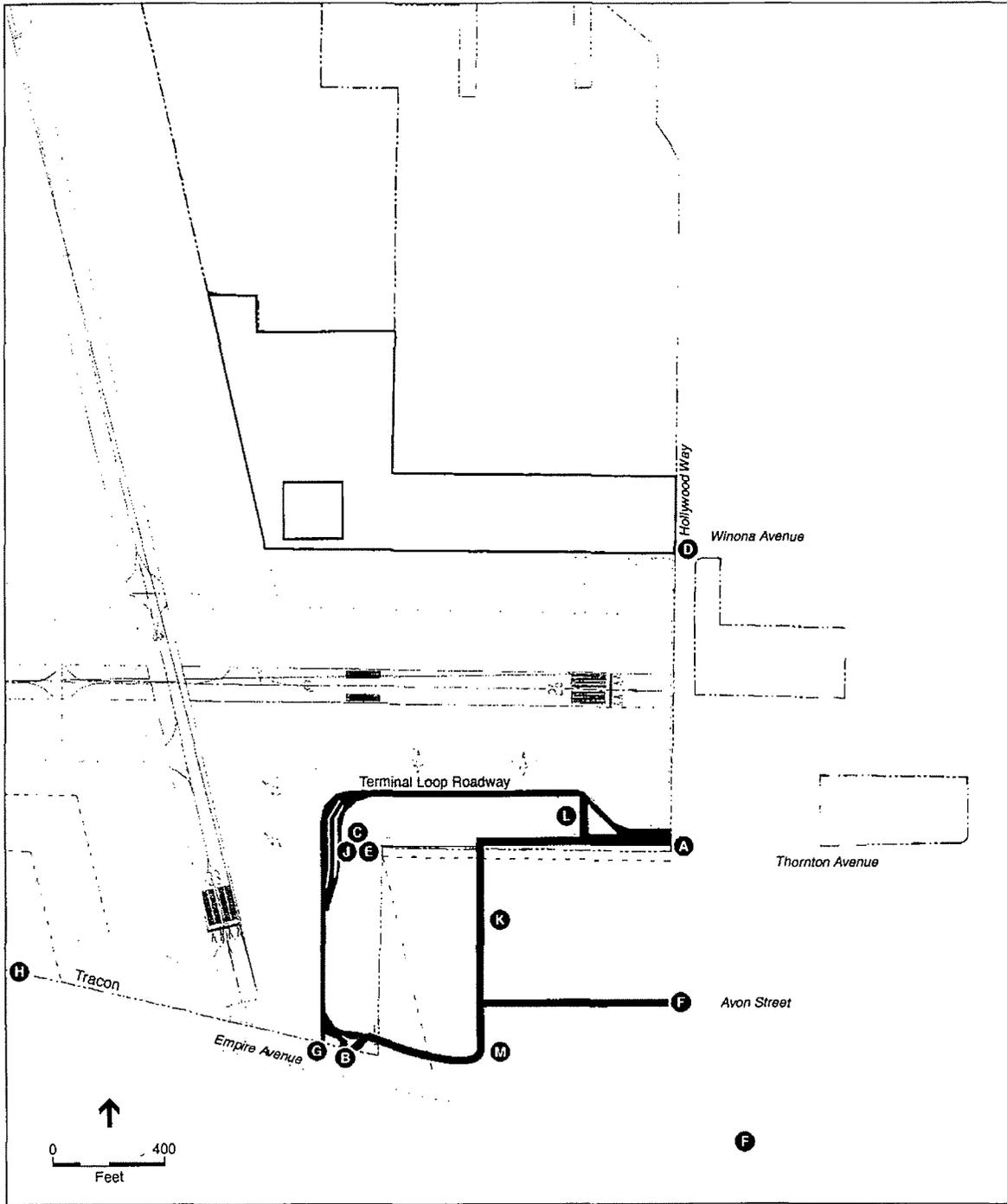
The valet patron enters the airport either via Hollywood Way entrance (see "A" on Figure B-1) or Empire Avenue entrance (see "B" on Figure B-1). The valet patron drops off his/her vehicle at the Valet drop-off location immediately west of the Short-Term Parking Structure (see "C" on Figure B-1). The valet attendant either parks the car in the Valet East Lot (200 spaces), the Valet South Lot (582 spaces), the Car Wash (69 spaces), or drives car to B-6 Trust Property (1,265 spaces) going through Hollywood Way / Thornton Avenue intersection (A) and Hollywood Way / Winona Avenue intersection (see "D" on Figure B-1).

The valet patron returns to the airport and valet attendant retrieves the car either from the Valet East Lot, Valet South Lot, Car Wash, or from the B-6 Trust Property. For the B-6 Trust Property, the valet attendant goes through the Hollywood Way / Winona Avenue intersection (D) and the Hollywood Way / Thornton Avenue intersection (A). The valet attendant delivers the car to the Valet pick-up area (see "E" on Figure B-1). The valet patron leaves the airport either via the Hollywood Way exit (A) or the Empire Avenue exit (B).

Future movements for cars of patrons using valet parking.

The valet patron would enter the airport either via Hollywood Way entrance (A) or Empire Way entrance (B). The valet patron would drop off the vehicle at Valet drop-off location immediately west of the Short-Term Parking Structure (C). Valet attendant would either park the car in the combined valet storage lot (this includes the existing Valet South Lot and the proposed A-1 Lot). Under the proposed project, no valet-parked cars would go through the Hollywood Way / Thornton Avenue intersection (A) or the Hollywood Way / Winona Avenue intersection (D).

The valet patron returns to the airport and the valet attendant would retrieve the car either from the Valet South lot or from the A-1 Lot. The valet attendant would deliver the car to the Valet pick-up area (E). The valet patron would leave the Valet pick-up area via a new roadway that connects with the eastbound Terminal Loop Roadway and would leave the airport either via the Hollywood Way exit (A) or the Empire Avenue exit (B).



SOURCE: Environmental Science Associates

Development Agreement and Related Actions / 204014 ■

Figure B-1
 Intersection Locations for
 Traffic Movements

At the moment, it is not reasonably foreseeable that it will be necessary to park valet cars on the B-6 Trust Property in the future. However, The proposed agreement only prohibits such parking for a two-year period. In the event that such a need occurs, the traffic movement would be the same as that described for current movements of valet cars parked on the B-6 Trust Property.

SHORT-TERM PUBLIC PARKING PATRONS

Current movements for cars of patrons using short-term public parking.

The short-term public parking patron enters airport either via Hollywood Way entrance (A) or Empire Avenue entrance (B). The short-term public parking patron enters the short-term public parking structure or the short-term public parking lot via the entrance driveway from the westbound Terminal Loop Roadway.

The short-term public parking patron leaves the short-term public parking area via the exit driveway onto eastbound Terminal Loop Roadway. The short-term public parking patron exits the airport either via the Hollywood Way exit (A) or the Empire Avenue exit (B).

Future movements for cars of patrons using short-term public parking.

There would be no change in the traffic movements for short-term public parking patrons. The only difference is that the Valet East Lot would be converted to short-term public parking and the short-term public parking patron would have additional spaces for parking on a short-term basis.

LONG-TERM PUBLIC PARKING PATRONS

Current movements for cars of patrons using long-term public parking.

Long-term public parking patrons have the choice of numerous lots in the vicinity of the airport. These lots include Authority-operated Lot A (1,592 spaces), Lot B (637 spaces), and Lot C (518 spaces), as well as long-term parking operated by other entities. The intersections that long-term public parking patrons use depend on which long-term lot they use and their originating location. One of the long-term public parking lots is on the A-1 property. Long-term public parking patrons that use the A-1 Lot enter via a driveway that leads west from the Hollywood Way / Avon Street intersection, which is about midway between Thornton Avenue and Empire Avenue (see "F" on Figure B-1). None of the long-term public parking patrons use the Terminal Loop Roadway to access these long-term public parking lots. Each of the long-term public parking patrons access the terminal building by using a shuttle bus that is operated by the Authority (for those patrons using Lots A, B, and C) or a shuttle bus operated by another entity. The shuttle bus drops off long-term public parking patrons at the island adjacent to the valet drop-off area (C).

Long-term public parking patrons are picked up at the island adjacent to the valet drop-off area (C) and are driven to their cars by a shuttle bus operated by the Authority (for Lots A, B, and C) or by a shuttle bus operated by another entity. The long-term public parking patrons leave the airport vicinity by a variety of routes that are dependent on the long-term public parking lot used and the destination location of the long-term public parking patron.

Current movements of long-term public parking shuttle buses.

The shuttle buses that provide access between the long-term public parking lots and the terminal go through the Hollywood Way / Winona Avenue intersection (D) (for the shuttle bus going to and from Lot A), the Hollywood Way / Thornton Avenue intersection (A) (for the shuttle buses going to and from Lots A, B, and C as well as the shuttle buses operated by entities other than the Authority). In addition, the shuttle buses travel along the entire length of the Terminal Loop Roadway.

Future movements for cars of patrons using long-term public parking.

There would be no change in the traffic movements for long-term public parking patrons using long-term public parking lots operated by the Authority (Lots A, B, and C). The only difference is that the long-term public parking on the A-1 Lot would be accessed by two entrance driveways: (1) the existing driveway that leads west from the Hollywood Way / Avon Street intersection (F); and (2) a driveway off the realigned northbound portion of the Terminal Loop Roadway (see "K" on Figure B-1). For long-term parking patrons using the A-1 Lot, egress from this lot would be via the driveway that provides access to the northbound portion of the realigned Terminal Loop Roadway (K). Long-term parking patrons using the A-1 Lot would leave the airport either via the Hollywood Way exit (A) or the Empire Avenue exit (B)

Future movements of long-term public parking shuttle buses.

There would be no change in the traffic movements for long-term public parking shuttle buses that provide access to Lots A, B, and C.

For shuttle buses that provide access to the A-1 Lot, these buses would access the A-1 Lot via the realigned Terminal Loop Roadway. Therefore, no shuttle buses that provide access to the A-1 Lot would go through the Hollywood Way / Thornton Avenue intersection (A).

PARKING FOR EMPLOYEES***Current movements for cars of employees.***

Employees either park in the Employee Lot (which is adjacent to Lot A and is operated by the Authority), the short-term public parking structure, or in spaces contained on the A-1 Lot (which is operated by another entity). For employees using the Employee Lot, access is through the Hollywood Way / Winona Avenue intersection (D). For employees using the short-term public parking structure, access is via the entrance driveway from the westbound Terminal Loop Roadway. For employees that use the A-1 Lot, access is via the driveway that leads west from the Hollywood Way / Avon Street intersection, which is about midway between Thornton Avenue and Empire Avenue (F). For employees using the Employee Lot or the A-1 Lot, employees access the terminal building by using a shuttle bus. The shuttle buses drop off employees at the island adjacent to the valet drop-off area (C).

For employees leaving the airport that have parked in the Employee Lot or the A-1 Lot, shuttle buses leave from the island adjacent to the valet drop-off area (C). The shuttle buses go through the Hollywood Way / Thornton Avenue intersection (A). For those employees that use the Employee Lot operated by the Authority, the shuttle bus also goes through the Hollywood Way /

Winona Avenue intersection (D). Employees leave the Employee Lot via the Hollywood Way / Winona Avenue intersection (D). For employees that use the A-1 Lot, employees leave the lot via the driveway that leads west from the Hollywood Way / Avon Street intersection, which is about midway between Thornton Avenue and Empire Avenue (F). For employees that use the short-term public parking structure, employees leave the structure via the exit driveway onto eastbound Terminal Loop Roadway. These employees exit the airport either via the Hollywood Way exit (A) or the Empire Avenue exit (B).

Current movements for employee parking shuttle buses.

The shuttle buses operated by the Authority go through the Hollywood Way / Winona Avenue (D) and the Hollywood Way / Thornton Avenue intersections (A). The shuttle buses that serve the A-1 Lot go through the Hollywood Way / Avon Street intersection, which is about midway between Thornton Avenue and Empire Avenue (F) and the Hollywood Way / Thornton Avenue intersection (A).

Future movements for cars of employees.

Employees would either park in the short-term public parking structure, the Employee Lot or the Car Wash, all of which are operated by the Authority. For employees using the short-term public parking structure, access is from the Terminal Loop Roadway and access to this roadway would be either by the Hollywood Way entrance (A) or the Empire Avenue entrance (B) to the airport. For employees using the Employee Lot, access would be through the Hollywood Way / Winona Avenue intersection (D). These employees would access the terminal building via shuttle bus. The shuttle buses would drop off employees at the island adjacent to the valet drop-off area (C). For employees that use the Car Wash, access is from the Terminal Loop Roadway and access to this roadway would be either by the Hollywood Way entrance (A) or the Empire Avenue entrance (B) to the airport.

For employees that use the short-term public parking structure, employees would walk to their cars and leave the short-term public parking structure via the exit driveway to the eastbound Terminal Loop Roadway and exit the airport either via the Hollywood Way exit (A) or the Empire Avenue exit (B). For employees that have parked in the Employee Lot, leaving the airport would be done by using the shuttle buses that leave from the island adjacent to the valet drop-off area (C). The shuttle buses would go through the Hollywood Way / Thornton Avenue intersection (A) and the Hollywood Way / Winona Avenue intersection. For employees that use the Car Wash, employees would walk to their cars and leave the Car Wash via the Terminal Loop Roadway and exit the airport either via the Hollywood Way exit (A) or the Empire Avenue exit (B).

Future movements for employee parking shuttle buses.

There would be no change in the roadways used by the shuttle buses that travel between the terminal and the Employee Lot. With no employee parking occurring in the A-1 Lot, no shuttle buses would be used to provide employees access to the terminal from the A-1 Lot.

PARKING FOR RENTAL CARS

Current movements of rental cars.

Most rental car customers that arrive at the airport pick up their rental car in the Rental Ready Lot (also known as the Terminal South Lot). These on-airport rental car customers leave the airport either via Hollywood Way exit (A) or Empire Avenue exit (B). Other rental car customers that use off-airport rental car companies take a shuttle bus from the island adjacent to the valet drop-off area (C).

For rental car customers that have rented from on-airport rental car agencies, the rental car customer returns to the airport and enters the airport either via the Hollywood Way entrance (A), Empire Avenue entrance (B), or enters Rental Ready Lot (Terminal South Lot) via the one-way entrance from Empire Avenue west of the Empire Avenue entrance to the airport (see "G" on Figure B-1). Rental car companies shuttle each returned rental car to the maintenance area in the southwest quadrant of the airport using the Empire Avenue exit (B) and the Clybourn Avenue / Empire Avenue intersection (see "H" on Figure B-1). The returned rental car is serviced and then shuttled to either the Rental Ready Lot (Terminal South Lot) using the Clybourn Avenue / Empire Avenue intersection (H) and the one-way entrance from Empire Avenue west of the Empire Avenue entrance to the airport (G) or the B-6 Rental Car Lot using the Clybourn Avenue / Empire Avenue intersection (H), the airport entrance / Empire Avenue intersection (B), the Hollywood Way / Thornton Avenue intersection (A), and the Hollywood Way / Winona Avenue intersection (D). The serviced rental car can be shuttled either by turning left at the airport entrance / Empire Avenue intersection (B) and following the Terminal Loop Roadway to make a left at the Hollywood Way / Thornton Avenue intersection (A) or by going straight through the airport entrance / Empire Avenue intersection (B) and making a left turn from Empire Avenue to Hollywood Way (see "T" on Figure B-1) and then go straight through the Hollywood Way / Thornton Avenue intersection (A) to the Hollywood Way / Winona Avenue intersection (D).

If the rental car is parked at the B-6 Trust Property Rental Car Lot, the rental car is shuttled to the Rental Ready Lot (Terminal South Lot) when it is needed going through the Hollywood Way / Winona Avenue intersection (D) and the Hollywood Way / Thornton Avenue intersection (A).

For rental car customers that have rented from off-airport rental car companies, the rental car customer returns the rental car to the off-airport rental car companies' lots and uses a shuttle bus to access the airport and the terminal.

Current movements for rental car company shuttle buses.

Depending on the location of the off-airport rental car company, the shuttle buses operated by these off-airport rental car companies arrive at and leave from the airport either by the Hollywood Way exit (A) or the Empire Avenue exit (B).

Future movements of rental cars.

It is assumed that some off-airport rental car companies would become on-airport rental car companies as a result of the proposed project. Rental car customers would arrive at the airport and would go to the shuttle bus stop across the Terminal Loop Roadway from the terminal and adjacent to the shuttle bus stop for public long-term parking patrons (see "J" on Figure B-1). The shuttle bus would take the rental car customer to the rental car counter at Lot A-1. The rental car

customer would pick up their rental car and exit the rental car lot via a driveway that provides access to either the northbound portion of the realigned Terminal Loop Roadway (see "M" on Figure B-1) or to the driveway that leads west from the Hollywood Way / Avon Street intersection (F). For rental car customers using the northbound portion of the realigned Terminal Loop Roadway, the rental car customer would leave the Airport either via the Hollywood Way exit (A) or the Empire Avenue exit (B). For rental car customer using the driveway that leads west from the Hollywood Way / Avon Street intersection (F), the rental car customer would either turn right to go southbound on Hollywood Way, go straight through the intersection onto Avon Street for access to eastbound or westbound Empire Avenue, or turn left to go northbound on Hollywood Way to the Hollywood Way / Thornton Avenue intersection (A).

The rental car customer would return to the A-1 Lot to drop off the rental car. The rental car customer would access the Airport either via the Hollywood Way entrance (A) or the Empire Avenue (B) entrance. Once on the Terminal Loop Roadway, the rental car customer would access the rental car center via the driveway from the realigned Terminal Loop Roadway (M). The rental car customer would get on the shuttle bus that returns the rental car customer to the shuttle bus drop-off location at the airport terminal (J). Most of the servicing of the rental car would occur on the A-1 Lot at the Quick Turn Around (QTA); therefore, the rental car would remain on the A-1 Lot until it is ready for rental. For heavier maintenance (e.g., oil changes, replacement of parts, etc.), the rental car would be serviced at a maintenance area at the southwest quadrant of the airport and then returned to be rented again. Trips for maintenance purposes would use the driveway that leads west from the Hollywood Way / Avon Street intersection, the Hollywood Way / Empire Avenue intersection (I), the airport entrance / Empire Avenue intersection (B), and Clybourn Avenue / Empire Avenue intersection (H). Return trips from the maintenance area to the rental car center on the A-1 property would use the Clybourn Avenue / Empire Avenue intersection (H), the airport entrance / Empire Avenue intersection (B), and the driveway to the rental car center from the realigned Terminal Loop Roadway (M).

Future movements for rental car company shuttle buses.

The rental car shuttle bus would operate in a loop between the shuttle bus stop at the shuttle bus stop across the Terminal Loop Roadway from the terminal and adjacent to the shuttle bus stop for public long-term parking patrons (J) and the rental car center at the A-1 Lot. To take rental car customers from the terminal to the rental car center, shuttle buses would use the driveway to the rental car center from the realigned Terminal Loop Roadway (M). To take rental car customers from the rental car center to the terminal, shuttle buses would use the driveway from the rental car center to the northbound portion of the realigned Terminal Loop Roadway (M) and the U-turn on the Terminal Loop Roadway (see "L" on Figure B-1).

Although some off-airport rental car companies would use the facilities on the A-1 Lot, other rental car companies would continue to have off-airport rental car facilities. The shuttle buses to these off-airport rental car facilities would operate between the rental car center at the A-1 Lot and the off-airport rental car facility. Depending on the location of the off-airport rental car company, the shuttle buses operated by these off-airport rental car companies arrive at the airport from either the Hollywood Way entrance (A) or the Empire Avenue entrance (B). Depending on the location of the off-airport rental car company, the shuttle buses would leave the airport via the Hollywood Way exit (A) or the driveway that leads west from the Hollywood Way / Avon Street intersection (F).

PREMIUM SELF-PARKING***Current movements of cars of premium self-parking customers.***

Premium self-parking does not currently exist at the airport. Therefore, no movements are associated with a premium self-parking operation.

Future movements of cars of premium self-parking customers.

Premium self-parking patrons would enter the airport either via Hollywood Way entrance (A) or Empire Avenue entrance (B). The premium self-parking patron enters premium self-parking lot (Terminal South Lot) via the entrance driveway from the westbound Terminal Loop Roadway.

Premium self-parking patrons would leave the premium self-parking lot via the exit driveway onto southbound Terminal Loop Roadway. The premium self-parking patron exits the airport either via Hollywood Way exit (A) or Empire Avenue exit (B).

KEVIN MULDOON

1. Please see the response to comment #2 of the Philip and Carolyn Berlin letter.
2. The Draft MND/IS provides an evaluation of the impacts associated with the proposed Project. The growth rates used to estimate future general aviation jet operations were based on actual aircraft operations and the FAA's Aerospace Forecasts. It is important to acknowledge that the number of future aircraft operations would not be affected by the completion of Taxiway D. Therefore, no changes are required to the noise impacts shown on pages 39 through 49 of the Draft MND/IS.
3. The project description in the Draft MND/IS explains the various timeframes incorporated into the Development Agreement. The Authority is restricted from developing parking in the Southwest Quadrant for four years. The term of the Development Agreement is 7 years; however, certain provisions of the Development Agreement are intended to survive for a term of 10 years. Specifically, the Development Agreement would restrict the Authority's from expanding the existing passenger terminal or developing a new passenger terminal during the 10-year period.
4. As shown in Table 5 on page 43 of the Draft MND/IS, the number of aircraft operations would not change as a result of the proposed Project. Therefore, the number of taxi operations at the Airport would not change as a result of the proposed Project.
5. The proposed Project includes all potential development that could occur and the commenter does not provide examples of what development "parts" have not been included. Please also see the responses to comment #1 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter, comment #6 of the Philip and Carolyn Berlin letter, and comment #5 of the Dr. David W. Gordon letter.
6. It is assumed that the commenter arrived at a figure of 19,700 square feet of buildings by adding together the 10,200-square-foot rental car center customer building and the 9,500-square-foot rental car center quick turn around facility. Because the Authority has decided not to develop a rental car center as part of the proposed Project, these two buildings no longer are planned for construction.
7. The construction of Taxiway D will not cause an increase in departures to the east on Runway 8-26 due to the current operating restriction that prohibits aircraft with more than one engine weighing over 12,500 pounds from departing on Runway 8. Additionally, since departures to the east begin at the Runway 8 end, Taxiway D is not located to serve this type of operation. The new segment of Taxiway D is located at the Runway 26 end.
8. Pages 30 through 33 of the Draft MND/IS provides a discussion of the impacts of the proposed Project with respect to hazards and hazardous material.

9. For a discussion of master planning at the Airport, please see the response to comment #1 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter. For a discussion regarding the speculative future uses of the B-6 Trust Property, please see the response to comment #15 of the Philip and Carolyn Berlin letter.

10. The Authority is the proper lead agency for the proposed Project because it is the public agency that will implement the proposed Project and is the agency that will act first on the proposed Project.

224

FAXed to (818) 840-8213

150 S. Glenoaks Blvd., #9133
Burbank, CA 91502
October 18, 2004

Re: Mitigated Negative Declaration for Proposed Development Agreement

Dan Feger, Deputy Executive Director
Burbank-Glendale-Pasadena Airport Authority
2627 Hollywood Way
Burbank, California 91505

Dear Mr. Feger:

After reviewing the Authority's September 23, 2004 Mitigated Negative Declaration it appears to be inadequate and a full Environmental Impact Report (EIR) should be done for the Proposed Development Agreement for the reasons.

First, Section 21803(b) of the Public Resources Code states, in part, that CEQA guidelines, "shall require a finding that a project may have a significant effect on the environment if any of the following conditions exist: (b) The possible effects of a project are individually limited but cumulatively considerable. As used in this subdivision, 'cumulatively considerable' means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (See also CEQA Guidelines Sections 15130 and 15065(c).) In the past the Courts have said that the Authority has piecemealed several projects without producing an EIR, and they should not be doing that. It is also clear that in the future the Authority plans to build a new terminal building on property formally known as the B-6 Property. For this reason a full EIR should now be produced.

1

Second, this document states that the relocation of rental car and valet parking from the B-6 Property to the property at Hollywood Way and Empire (A1-North) will significantly reduce traffic on Hollywood Way, however it ignores the fact that in the future, when a new terminal building is built on the B-6 Property, all that traffic will return to Hollywood Way.

2

Third, the Federal Government requires a SEIR, and the Authority has not produced one for this proposed project.

3

And finally, the Authority proposed to pay approximately \$41,000,000 for 27 acres of land that is probably worth closer to \$27,000,000 without having the property appraised. This is an affront to the Authority's customers and ratepayers. I also believe that this violates the policies and laws of the Federal Government, and it should be corrected.

4

Sincerely,



Howard Rothenbach

HOWARD ROTHENBACH

1. For a discussion regarding the alleged segmentation of the proposed Project, please see the responses to comment #1 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter, comment #6 of the Philip and Carolyn Berlin letter, and comment #5 of the Dr. David W. Gordon letter. For a discussion regarding the alleged plans for relocation of the passenger terminal, please see the responses to comment #9 of the City of Burbank letter, comment #3 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter, and comments #6 and #7 of the Philip and Carolyn Berlin letter.
2. The development of a new passenger terminal on the B-6 Property is speculative and not included as part of the proposed Project. Therefore, it is not appropriate to evaluate any traffic that would access a new passenger terminal that is not contemplated to be developed as part of the proposed Project. Please also see the responses to comment #9 of the City of Burbank letter, comments #1 and #3 of the Natural Resources Defense Council / Coalition for Clean Air / Communities for a Better Environment letter, and comments #6 and #7 of the Philip and Carolyn Berlin letter.
3. The California Environmental Quality Act does not require an EIR for this proposed Project because there no potential significant impacts would result from the proposed Project. Further, the provisions of the National Environmental Policy Act (NEPA) do not apply to the proposed Project.
4. Please see the responses to comments #6, #7, and #8 of the Philip and Carolyn Berlin letter.

From: Dan Feger [DFEGER@bur.org]
Sent: Monday, October 18, 2004 4:53 PM
To: dfull@esassoc.com; dsnow@rwglaw.com
Subject: Fwd: Bob Hope Airport Dev. Agreement Negative Declaration

>>> Mark Stebbeds <mark@stebbeds.net> 10/18/2004 4:21:10 PM >>>
I am opposed to a Negative Declaration being acceptable as an environmental review instrument, and insist that a complete Environmental Impact Report be made before any construction, large or small, begins at the airport.

A recent study by USC's Keck School of Medicine, published in the New England Journal of Medicine provides definitive evidence that routine exposure to dirty air harms lung development in children, leading to a permanently reduced ability to breathe, causing a wide range of health problems.

Your Notice of Intent to Adopt a Negative Declaration was issued before the results of this study was released to the public, and no consideration is given to this very important discovery that will effect all Burbank residents. Your study does not indicate the increase in aircraft that may ensue as a result of the new taxiway, and therefore the increase in pollution. Your study is incomplete, and only a complete study, including air pollution monitors at the airport is acceptable.

1

Other parts of your report are unsatisfactory, including

1) The contaminated run off from washing vehicles. There is no indication that the water will be filtered to remove oil and chemicals before being dumped into a public storm drain. There is no indication that the car wash facilities will filter and recycle water as a conservation effort. You have supposed to have this for your busses, why not for the hundreds of automobiles?

2

2) The digging up of land to bury gasoline tanks for refueling. There is no indication of soil testing to determine if it is safe from chemicals, particularly leftover from Lockheed. What happens to the contaminated dirt? Can poisonous particles become airborne?

3

3) Fuel tanks buried in public areas. There is no safety report regarding the casualties if there is an accident, such as an explosion. What toll would this put on our fire department and other city services? There is no indication that the operators will be certified. What happens if there is a fuel leak. Is the current refueling location safer, because it is away from the public? The answer has to be YES.

4

4) Air pollution monitors. Are there any at the airport? Isn't this irresponsible to the health and safety of the community?

5

These are only a few of the many dangerous and hazardous conditions that could exist. As a resident of Burbank, I insist that a complete Environmental Impact Report be conducted by a certified agency. It would irresponsible to proceed otherwise.

6

Mark Stebbeds
843 N. Ford Street
Burbank, CA 91505

818-769-5733

MARK STEBBEDS

1. As shown in Table 5 on page 43 of the Draft MND/IS, the number of aircraft operations would not change as a result of the proposed Project. Therefore, no change in toxic air emissions would occur as a result of the proposed Project.
2. As stated on page 35 of the Draft MND/IS, the proposed Project would be required to comply with the Standard Urban Stormwater Mitigation Plan (SUSMP) for Los Angeles County and Cities in Los Angeles County issued by the Regional Water Quality Control Board. This would ensure that no water quality issues would occur as a result of the proposed Project.

For a discussion of the impacts associated with excavation on the A-1 North Property, please see pages 32 and 64 of the Draft MND/IS.

3. With the Authority's decision not to develop a rental car center on the A-1 North Property, no Quick Turn Around (QTA) facility (which would have included underground fuel tanks) would be developed. Section C of this document provides an updated analysis of the impacts of the proposed Project assuming no development of a rental car center on the A-1 North Property.
4. Although no air quality monitoring stations exist at the Airport, such stations are placed throughout the south coast air basin.
5. The proposed Project has no potential to result in significant impacts to the environment upon implementation of the identified mitigation, and the Authority is the proper lead agency to undertake the CEQA analysis. Please also see the response to comment #10 of the Kevin Muldoon letter.

F. MITIGATION MONITORING AND REPORTING PROGRAM

Introduction

The California Environmental Quality Act (CEQA, Section 21081.6(a)(1) of the Public Resources Code requires public agencies, as part of the adoption of a Mitigated Negative Declaration (MND), to prepare and approve a reporting or monitoring program. This program should be structured to ensure that changes to the project that the lead agency has adopted to mitigate or avoid significant environmental impacts are carried out during project implementation.

The Mitigation Monitoring and Reporting Program (MMRP) contained herein is intended to satisfy the requirements of CEQA as they relate to the Burbank-Glendale-Pasadena Airport Authority Development Agreement and Related Actions MND/IS. The MMRP is intended to be used by Burbank-Glendale-Pasadena Airport Authority (Authority) staff, participating agencies, and mitigation monitoring personnel during implementation of the components of the proposed Project. The intent of the MMRP is to ensure the effective implementation and enforcement of adopted mitigation measures. The MMRP will consist of the following components:

Compliance Checklist

Table 5 contains a compliance monitoring checklist that provides a synopsis of all adopted mitigation measures, the entity responsible for their implementation, the entity responsible for monitoring, and the timing of implementation. All the mitigation measures presented in **Table 5** will be incorporated into the proposed Project.

Implementation and Monitoring of Mitigation Measures

Since the mitigation measures will be incorporated into the proposed Project, implementation and monitoring of mitigation measures will occur at various stages of implementation of the proposed Project, which may include, but are not limited to, the following:

- Grading, site preparation; and construction of the proposed Project.
- On-site, day-to-day monitoring of construction activities.
- Reviewing construction plans and equipment staging/access plans to ensure conformance with adopted mitigation measures.
- Ensuring contractor knowledge of and compliance with all appropriate permit conditions and the MMRP.
- Verifying the accuracy and adequacy of contract wording.
- Having the Authority to require correction of activities that violate project permit conditions or mitigation measures.

- Acting in the role of contact for property owners or any other affected persons who wish to register observations of violations of project permit conditions or mitigation. Upon receiving any complaints, the inspector shall immediately contact the construction representative. The inspector shall be responsible for verifying any such observations and for developing any necessary corrective actions in consultation with the construction representative and the Authority.
- Obtaining assistance as necessary from technical experts, such as archaeologists, in order to develop site- specific procedures for implementing the mitigation measures. Particularly for implementing the appropriate site documentation should cultural resources be unearthed during excavation.
- Maintaining a log of all significant interactions, violations of permit conditions or mitigation measures, and necessary corrective measures.

Responsibility of implementation and monitoring of mitigation measures will typically reside with the Authority as described in **Table 5**.

TABLE 5
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Compliance Standards	Timing	Verification of Compliance (Initials and Date)
<p>1. CONSTRUCTION-RELATED AIR POLLUTANT EMISSIONS</p> <p>The Authority shall require contractors to comply with the following best management practices to reduce pollutant emissions during construction activities.</p> <p>(A) All off-road construction equipment shall be well-tuned and regularly serviced to minimize exhaust emissions. A regular and frequent check-up and service/maintenance program shall be established for all equipment used during construction.</p> <p>(B) Ultra-low sulfur fuel (with low sulfur and low aromatic content) in combination with a fuel additive (such as Puri-NOx) shall be used in all diesel-powered off-road equipment to minimize NOx emissions.</p> <p>(C) The injection timing on all diesel-powered equipment shall be retarded to minimize NOx emissions.</p> <p>(D) Electrically-powered equipment, or equipment fueled by an alternative, less-emitting fuel (e.g., liquefied natural gas [LNG] or compressed natural gas [CNG]) shall be used, as feasible.</p>	<p>Burbank-Glendale-Pasadena Airport Authority</p>	<p>Authority's Project Manager</p>	<p>Verification of compliance by contractor. Report on compliance to be submitted to the contractor to the Authority.</p>	<p>Prior to and during construction</p>	

232

2. CONSTRUCTION-RELATED CULTURAL RESOURCE IMPACTS

Pursuant to CEQA Guidelines 15064.5 (f), the Authority shall institute "provisions for historical or unique archaeological resources accidentally discovered during construction". Therefore, in the event that any prehistoric or historic subsurface cultural resources are discovered during ground disturbing activities, all work within 50 feet of the resources shall be halted and the project proponent and/or lead agency shall consult with a qualified archaeologist or paleontologist to assess the significance of the find. If any find is determined to be significant, representatives of the project proponent and/or lead agency and the qualified archaeologist and/or paleontologist would meet to determine the appropriate avoidance measures or other appropriate mitigation, with the ultimate determination to be made by the County. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and a report prepared by the qualified archaeologist according to current professional standards.

Burbank-Glendale-Pasadena Airport Authority

The Authority in coordination with the City of Burbank Department of Environmental Management and Los Angeles County Coroner, Native American Heritage Commission

Verification of compliance from Department of Environmental Management. Report on compliance to be submitted to by the Department of Environmental Management to the Authority.

Instructions included in grading and excavation contract and during site development

If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out.

In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken:

- (1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - (A) The coroner of the county in which the remains are discovered

must be contacted to determine that no investigation of the cause of death is required, and

(B) If the coroner determines the remains to be Native American:

1. The coroner shall contact the Native American Heritage Commission within 24 hours.
 2. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
 3. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
- (2) Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
- (A) The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.
 - (B) The descendant identified fails to make a recommendation; or
 - (C) The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

234

3. CONSTRUCTION-RELATED SOIL AND EROSION CONTROL

The Authority shall require contractors to comply with the following best management practices to reduce impacts due to soil loss and erosion during construction activities:

Burbank-
Glendale-
Pasadena
Airport
Authority

Authority's Project
Manager

Verification of compliance by
contractor. Report on
compliance to be submitted to
by the contractor to the
Authority.
Prior to and
during
construction

(A) As grading progresses, erosion control and protective devices shall be removed or installed as needed to minimize risk of sediment discharge from the site. Site perimeters shall be protected with sandbags, silt fence or other acceptable best management practices. Debris and mud will be contained within the site, and may not be transported from the site via sheet flow, swales, area drains, natural drainage courses or wind. Active storm drain inlets and outlets will be protected to prevent potential pollutants from discharging the site.

(B) Construction site to be inspected at 40% prediction of rain, every 24 hours during extended rain events, and within 24 hours after each storm event to ensure that all best management practices and devices are functional, and to determine maintenance needs. No potential pollutants shall be allowed to be discharged offsite or into drains. A contingency stormwater sampling plan, and sample kits shall be onsite, or at a nearby location.

(C) Materials containing potential pollutants shall be protected from contact with stormwater. Any accidental spill of a potential pollutant shall be contained and cleaned up promptly to prevent discharge from site.

(D) Equipment maintenance activities shall be performed in the designated areas onsite.

(E) Water trucks shall be used as needed, to minimize

235

fugitive dust.

(F) Active construction entrance driveways will be stabilized to minimize dirt or mud being tracked into public streets. Street sweepers, broom sweeping or approved best management practices shall be used as needed to clean up dirt which enters public streets.

(G) Stockpiles of dirt or sand will not be allowed to discharge from the site, via wind or exposure to stormwater.

(H) Completed slopes over 5 feet high shall be stabilized with any of the following: copolymer, hydroseed material, jute netting, earthguard, or other accepted best management practice measures.

(J) Designated concrete washout stations will be used onsite for all concrete waste water.

4. CONSTRUCTION-RELATED HAZARDOUS MATERIALS

Prior to commencement of excavations exceeding 10 feet in depth, the Authority will conduct focused investigations of the areas to be graded.

(A) If soil is determined to be contaminated, it shall be cleaned or excavated as necessary to complete the work and shall be disposed only at a facility permitted to take such soil.

(B) If, during the execution of any grading contemplated by the scope of work, suspected hazardous materials, odors, liquids, or other substances are encountered, the contractor is to immediately contact the Authority for direction before proceeding in the suspected area of contamination. No

Verification of compliance by contractor. Report on compliance to be submitted to the contractor to the Authority.

Prior to and during construction

Authority's Project Manager

Burbank-Glendale-Pasadena Airport Authority

work shall continue unless and until the suspected material is tested for contamination. If soil is determined to be contaminated, it shall be cleaned or excavated as necessary to complete the work and shall be disposed only at a facility permitted to take such soil.

5. CONSTRUCTION-RELATED TRAFFIC

The Authority shall require contractors to comply with the following best management practices to reduce impacts related to construction traffic as follows:

- (A) Schedule critical construction activities at times other than during normal airport passenger terminal operating hours.
- (B) Post advance warning signs to notify drivers of construction activities.
- (C) Use flaggers to direct traffic, as needed.
- (D) Provide advance notification to all parties within 500 feet about the location, timing, and duration of construction activity.
- (E) Coordinate with the City as appropriate to avoid or minimize construction related impacts on City streets.

Burbank-
Glendale-
Pasadena
Airport
Authority

Authority's Project
Manager

Verification of compliance by contractor. Report on compliance to be submitted to the contractor to the Authority.

Prior to and during construction