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November 17, 2008

Ms. Karen Hoo
Environmental Planning
Los Angeles World Airports
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

RE: Notice of Availability and Public Meeting on a Draft Environmental Impact Report for the Van Nuys Airport Noisier Aircraft Phaseout Project

Dear Ms. Hoo:

The Aircraft Owners and Pilots Association (AOPA) represents more than 415,000 general aviation pilots and members nationwide, of whom more than 49,600 reside in the state of California. AOPA is concerned with the Van Nuys Airport Noisier Aircraft Phaseout based on the associated impacts to surrounding general aviation airports and their communities.

Impacts to Surrounding Airports, Communities and Businesses a Concern

Van Nuys Airport (VNY) is the busiest general aviation airport in the United States. With more than 700 based aircraft and 500,000 operations annually, VNY is an extremely critical part of the California transportation system. As we shared with the Burbank-Glendale-Pasadena Airport Authority in response to their proposed nighttime curfew, we suggest that shifting the noise and other environmental impacts from one airport at the expense of another nearby and adjacent airport community is not a good solution and should be the basis for a Federal Aviation Administration (FAA) denial of the proposed restrictions.

In addition, AOPA has significant concerns with the inevitable shift of several business operators and additional operations to surrounding Bob Hope (BUR), Los Angeles International (LAX), Camarillo (CMA), Chino (CNO), and William J. Fox Airfield (WJF). Each of these airports is part of the Southern California airport infrastructure and the result of these proposed restrictions have a good possibility of leading to proposed restrictions at many airports in the region. The offset or shifting of operations from one airport and associated community to another sets a dangerous precedent for the eventual elimination of airport businesses and interstate commerce.

Environmental Impacts Should Not be Ignored

As included in the Environmental Impact Report (DEIR), the project-level impacts will be a considerable contributor to the significant cumulative impacts at surrounding airports and their communities – specifically CMA and the South Central Coast Air Basin. The shift of aircraft operations from VNY to surrounding areas and airports will result in increased pollutant emissions in their respective locations. The fact that there are no feasible mitigation measures to

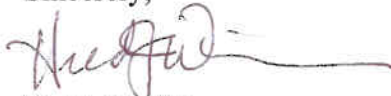
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avoid or substantially lessen the project's contribution to the cumulative air quality impacts is evidence that the project is likely to create environmental hurdles for surrounding communities that cannot be overcome. AOPA suggests that the most environmentally friendly alternative in this case is a "no action" solution, which still meets the over-arching goal of noisier aircraft reduction due to anticipated aircraft retirements.

In Conclusion

AOPA recognizes that LAWA is attempting to establish a maximum noise level for all aircraft arriving at and departing from VNY. While arguably there are positive impacts of a phaseout of noisier aircraft, the significant cumulative impacts associated with the proposed phaseout plan are of great concern and ultimately not in the best interests of the impacted airports and the surrounding community. AOPA strongly recommends that Los Angeles World Airports take no action and allow the anticipated aircraft retirements to produce the desired goals of a reduction of noisier aircraft at VNY over the coming years.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heidi J. Williams", with a long horizontal flourish extending to the right.

Heidi J. Williams
Senior Director Airports