



# California Pilots Association

*Promoting and Preserving California's airports*

835 Dune Street  
El Segundo, CA 90245  
June 9, 2008

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

Subj: BURBANK CURFEW PROPOSAL

Dear Commissioners:

I am writing you on behalf of the board and the statewide membership of the California Pilots Association. The California Pilots Association (CalPilots) is one that is dedicated to preserving the state's airports and the rights of the users of those airports. As the regional vice president (Region IV) for that association, I'd like to go on record that our association disagrees with the Airport Authority's proposal for a nighttime curfew at Bob Hope Airport (BUR). In your Part 161 study, the basic justification is benefits versus costs and the benefits appear to be all for the government and homeowners and the costs are all at the expense of the aviation operators and their employees, plus some travelers that will lose the convenience of a community airport. Somehow that doesn't seem fair.

I've reviewed your Part 161 study (Chapter 2 could neither be viewed nor downloaded from your web site and I had to settle for the Executive Summary) and can find no pressing demand to go beyond the voluntary curfew that already exists. While it is probably somewhere in the study, I can not find how many flights you have that currently operate during the 10 PM to 7 AM time period. It would seem that it is not a large number. Also, when the study talks of a restriction on the basis of noise level, versus a total curfew, it appears that AmeriFlight is not a problem. Their aircraft operations are not considered as so loud and noisy as to be a problem. Assuming that to be true, your noise problem must include some very loud nighttime flights that do not stand out in the reading of your study. That would be the only way that one could see justifying such a curfew. Punishing everyone for noise created by a few does not stand out as a policy of fairness.

The Bob Hope Airport has been, is, and can continue to be an economic benefit to your community. The aircraft operators based at the airport have tried to honor the request for a voluntary curfew during the hours you have asked of them. For the scheduled airlines, the 7 AM airport "opening" time is constraining on a businessman desiring to make a same-day meeting. Without the early flight, the businessman is forced to leave a day earlier than otherwise necessary. Likewise, when the late night arrivals are barred, that same businessman is confronted with another night in a hotel before being able to return. As you know, commercial air service depends on a certain level of connecting flights and



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their frequency. A reason that Palmdale's commercial operations struggle is that its users do not have a big choice in the selection of flights there. Should Bob Hope Airport reduce access to aviation operations, the operators and customers will take their business to someplace where they can expect a schedule of flights through out the day, from early morning and into the evening.

Another thing to be considered is the purpose of aviation in the first place. Aviation is able to provide efficient transportation to the populace with a kind of utility that does not exist when one is restricted to scheduled commercial airline operations. Enabling industry's managers to move in and out of your airports in an efficient manner enables the growth of businesses and positioning of company headquarters in a community.

The 161 study proposes to have all early morning flights and late night flights operate from a different airport. Doesn't that reduce the value of your airport? Doesn't it force travelers to need surface transportation from some more distant location in order to return to your community? And then there is the noise of which you complain. When you move it to another community, you spare your residents from hearing that noise so that they may sleep better, but you now make sleep more difficult for someone in the next community. Do you think that it is appropriate to move your noise so as to impact the residents of another community? Speaking of noise, I have to wonder what level of noise one gets from the tractor-trailers that speed by on the I-5 highway or the trains passing through the city. Has there been a study of the noise made by those vehicles?

Sincerely

  
Jack Kenton  
Vice President Region IV  
California Pilots Association