Communication from Public

Name: Loril Hirsch
Date Submitted: 02/27/2026 01:49 PM
Council File No: 25-1514
Comments for Public Posting: My name is Loril Hirsch. I am a long time Pocket resident and live next door to the Van Nuys Airport. I want to address ongoing issues with LAWA and the VNY manager Jacob Haik. In August, he removed four City Council–appointed CAC members and went unaddressed by the Board of Airport Commissioners, and two BOAC members were later reconfirmed despite ongoing governance issues. WHY? The City Council has a responsibility to make sure there is compliance with Zoning Ordinance 177327, and we urge Councilmembers Padilla, Raman, and Blumenfeld to update the Ordinance and halt any land recategorization until the new VNY Specific Plan is complete (which is part of motion 23-1339 that passed years ago!). Why is LAWA continuing to promote its unvetted land swap proposal despite strong opposition from The Pocket community, where I live? Residents have signed a peition calling for a Mitigation Wall along Havenhurst Ave while the City evaluates the feasibility and consequences of this speculative plan. Futhermore, LAWA had misleading outreach attempts in my community pushing thier agenda. I told them in person and I am telling you now, the community’s position is clear: build the Mitigation Wall and halt expansion efforts that lack environmental review and alternatives. Lastly, LAWA released six RFPs without any community input. In fact, they released the RFP's BEFORE meeting with neighborhood councils and tricking them that this was community outreach. LAWA needs to be put under a microscope. Their actions are hurting my community. City Council, specifically Councilperson Padilla, please, submit a motion to HALT any and all redevelpment until the specific airport plan is in place. Thank you. Loril Hirsch

Communication from Public

Name: Maciej M
Date Submitted: 02/27/2026 09:55 AM
Council File No: 25-1514
Comments for Public Posting: Please don’t make any changes that would adversely affect the long-time tenants at Van Nuys Airport. We are a community of pilots, aircraft owners, instructors, mechanics, and aviation enthusiasts who have invested years—often decades—into building our businesses, maintaining our aircraft, and fostering a safe, vibrant general aviation environment at VNY. Many of us operate single-engine aircraft and rely on reasonable access, predictable operating procedures, and affordable facilities to continue flying and serving the broader Los Angeles community. Decisions that significantly increase costs, restrict access, or limit operations could unintentionally undermine the very aviation ecosystem that has made VNY one of the most active and historic general aviation airports in the country. We respectfully ask that the needs and contributions of long-standing tenants be carefully considered before implementing any changes.

Communication from Public

Name:	Joshua Fint
Date Submitted:	02/27/2026 10:05 AM
Council File No:	25-1514
Comments for Public Posting:	In case the city has not been made aware, the input solicited regarding Van Nuys Airport does NOT support any of the proposed changes. Please see the attached, written on behalf of several organizations:

December 19, 2025

By Electronic Mail

Mr. Jacob Haik
Airport Manager – Van Nuys Airport
Los Angeles World Airports (LAWA)
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Los Angeles, CA 90045
jhaik@lawa.org
vnylandingfee@lawa.org

RE: Proposed VNY Landing Fee

Dear Mr. Haik:

Thank you for soliciting the input from the national associations on the proposed landing fee methodology at Van Nuys Airport (VNY). In June 2025, the Board of Airport Commissioners (BOAC) recognized that the methodology still needed a significant amount of work and was gracious to provide more time to continue those efforts. All of us share the concerns for financial viability of VNY and would like to see the development of a robust landing fee methodology that complies with federal law and Federal Aviation Administration (FAA) grant assurances; follows industry best practices; and is developed jointly with the tenants and stakeholders of the airport.

The national associations understand the challenges of bringing a new landing fee to an airport that operated without one for over 97 years. We would like to reiterate that we support LAWA in its mission to make VNY self-sustaining, however we have major concerns, as outlined further in this letter, that a landing fee is the required solution. While we appreciate the time LAWA has taken to engage consultants, to make further revisions, and to provide us with an update via the November 14, 2025 letter, we are disappointed with the path that LAWA has taken thus far by refusing multiple requests to hold a virtual meeting and to solve the challenges interactively and collaboratively, forcing all the substantive communication to be solely via one written letter since BOAC provided more time. LAWA's actions are substandard in terms of best industry practices for collaborating with affected stakeholders; additionally, the lack of transparency and the resulting methodology continue to be non-compliant with FAA requirements.

Our seven-page document only scratches the surface of the issues with the latest approach – such as missing budgetary information, and the absence of a comprehensive financial view of the airport's revenues and expenses (*i.e.*, no insights into the non-aeronautical portion and why it is not factored into the airfield calculations). That ultimately exacerbates the concerns about a lack of transparency and further erodes trust among the tenant and user/operator stakeholders, who are already apprehensive about the intentions and political motivation, rather than showing any true financial need behind these budget and policy changes, in light of the current environment and political pressures.

Despite this setback, please know that we continue to offer to work collaboratively with you and the LAWA team so as to avoid squandering the further chance at developing a robust landing fee methodology and successful financial practices for VNY that BOAC granted us back in June.

The Aircraft Owners and Pilots Association (AOPA), the Experimental Aircraft Association (EAA), the General Aviation Manufacturers Association (GAMA), the National Air Transportation Association (NATA), the National Business Aviation Association (NBAA), and Vertical Aviation International (VAI) represent pilots and aircraft owners, aircraft manufacturers, fixed base operators, the experimental aircraft community, charter and fractional operators, companies and individuals who use their aircraft in support of their business or are otherwise involved in the business aviation sector, as well as those with a focus on vertical aviation. Collectively, we are the heart of what Van Nuys stands for and are all strongly interested in the Airport's safety and future accessibility and viability.

We respectfully submit our comments and emphasize our continued concerns that the underlying methodology is incomplete and flawed, for reasons similar to those set forth in our June 4, 2025 letter, and addressed in greater detail below.

LAWA Again Has Failed to Engage in a Collaborative Process with VNY Stakeholders

As stated above, our primary concern is the lack of collaborative engagement with the stakeholders. The November 14th letter has been presented to the public as a *fait accompli*, with only 35 days for them to review and respond – a fraction of the already-insufficient time provided earlier this year. That is neither what the BOAC anticipated nor what the FAA requires. *See, e.g., Bombardier Aerospace Corporation v. City of Santa Monica*, No. 16-03-11, Director's Determination, at 49 (January 4, 2005) (an airport's methodology for landing fees must be predicated on a documented "reasonable relationship" to its underlying expenses).[1] Accordingly, although we have identified various errors and omissions below, the next step should not be for LAWA to unilaterally address them, much less to present a proposal to the BOAC, but to fully re-open the process to enable stakeholders to have complete access to LAWA's data and premises, and to work together to determine through transparent means what, if any, landing fee is appropriate at VNY. In your telephone discussions with NBAA we appreciate you indicating this as the next step after receiving our letter and other public comments. **We respectfully ask that we get a meeting scheduled for early January and finalize the time on the calendar before the end of December.**

Despite LAWA's Denials, the Record Suggests that the Proposal Is Both Retaliatory and Illegal

The letter denies that the amount of the fee is intended to be retaliatory or to discourage operations at VNY – even while asserting that a \$14.18 fee now could be justified, an increase of 46.9% since May (when a \$9.65 fee was proposed) and a 72.9% increase since March (when an \$8.20 fee was asserted to be justified).

Not only is LAWA's repeated discovery of previously-unknown financial requirements at VNY when asked questions by stakeholders deeply suspicious on its face, but implicitly reveals that its two prior sets of calculations were facially deficient, and provides no reason for the BOAC – or the FAA – to believe that LAWA has finally engaged in adequate analysis on its third attempt.

We also note that the June 5, 2025 staff report regarding the contract to Vector Airport Systems, LLC (Vector) to administer the VNY and LAX landing fees reveals that the fees are intended to discourage operations – *i.e.*, to "help manage the impact [of] operations on nearby communities." Despite the letter's claim that the proposal is motivated only by VNY's capital needs, the report appears to effectively concede that LAWA's motivations do include discouraging operations; that conflicts with the federal Airport Noise and Capacity Act (ANCA) as well as LAWA's Airport Improvement Program (AIP)-based obligations.[2]

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[1] The associations also must disagree with LAWA's contention that its outreach before the June 5, 2025 BOAC meeting was remotely adequate. What outreach there was concerned proposals which LAWA now appears to concede were deficient – and LAWA conveniently omits crucial facts such as that the landing fee to be charged for general aviation landings at LAX, a highly-relevant datapoint for VNY, was not disclosed until 72 hours before the BOAC meeting.

[2] Indeed, the letter unfortunately is permeated by statements that at best misunderstand and at worst defy FAA guidance. For example, in response to the associations' citation of certain FAA Part 16 proceedings in their June 4, *(continued…)*

LAWA Again Has Not Provided Sufficient Information Regarding its Proposed Methodology
As a preliminary matter, it is unfortunate that the overall tenor of the letter is to emphasize what LAWA believes it can do at VNY, rather than what it should do to ensure that the aeronautical use of VNY is prioritized. A notable example is its abbreviated discussion of the termination of the "reliever fee" previously transferred from Los Angeles International Airport (LAX) to VNY. Although not mandated, such transfers are common in multi-airport systems – and encouraged by the FAA – to ensure that reliever airports can fulfill their purposes. LAWA has discontinued the payments to VNY without any analysis of the consequences – and the letter clarifies only that it "believes" that the imposition of a landing fee at VNY would not shift general aviation operations to LAX.[3] To be blunt, hope is not a substitute. Again, the members of the BOAC include lawyers, investors, and other professionals who would never rely on such a lackadaisical analysis in support of their own endeavors. Nor should they accept it on behalf of the City of Los Angeles. For this reason alone, the proposal continues to be non-compliant with FAA requirements, as well as basic principles of law. Notably, the FAA has warned that a methodology which is "'off-the-cuff' or informal" is not "sound and justifiable." *See Aircraft Management Services, Inc. v. Santa Rosa County, Florida*, No. 16-12-02, Director's Determination, at 32 (March 27, 2015).

Turning to the overall methodology, the letter insists that LAWA is not required to consider the overall financial picture at VNY, but instead can assess landing fees to balance the books for an (alleged) airfield deficit, despite the airport as a whole being in the black. As an initial matter, LAWA misunderstands FAA guidance. The letter cites the non-existent ¶ 2.2.1 of the FAA Rates and Charges Policy, but presumably actually meant to refer to ¶ 2.1.1. In any event, that FAA guidance concerns the allocation of costs at an air carrier airport – as evidence by its reliance on 49 U.S.C. § 47129 – and is simply irrelevant to a general aviation airport.

Notably, the letter does not deny that the revenues from other cost centers at VNY can be utilized on the airfield (*see, e.g.,* the discussion of cost centers at pages 3 and 5 thereof) – and indeed, they not only should but must. And when the complete financial picture at VNY is considered, the letter concedes that the total revenues without a landing fee significantly exceed the total expenses – by $11.6 million in FY2026, and by as much or more in future years. *See* Exhibit C-1. **As a result, the purported need for a landing fee is significantly diminished, if not eliminated altogether.**

Additionally, the FAA has emphasized that in the calculation of airport fees, reasonableness must take precedence over self-sustainability. *See Airport Compliance Manual*, Order 5190.6B, at § 17.9; *Bombardier*, FAA Docket No. 16-03-11, Director's Determination, at 39. Accordingly, even if LAWA's methodology and underlying calculations were accurate – and as set forth above and below, they are not – LAWA still could not impose a landing fee at VNY without a further, separate consideration of whether the amount premised upon them is objectively reasonable. Respectfully, given that both figures for FY2026 discussed in the November 14, 2025 letter would significantly exceed the general aviation landing fees imposed elsewhere (as previously discussed by both the signatories to the letter and other stakeholders, including the California Pilots

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2025 letter, the November 14, 2025 letter asserted that "[t]he FAA has not made a determination on the landing fee in either *Santa Monica* case." In fact, FAA Docket No. 16-24-09 concerns landing fees that the FAA already determined to be excessive; the issue is whether Santa Monica had adequately reduced them to comply with its obligations. *See also Bombardier*, FAA Docket No. 16-03-11, Director's Determination, at 39 (fees charged by other airports are a factor in determining a fee's reasonableness).

[3] Although the VNY landing fee would be capped at $6.44, the equivalent of the fee at LAX, it would still be among the highest in the country.

Association), neither the $14.18 amount that LAWA alleges to be justified for FY2026, nor the $6.44 amount LAWA deems to charge for that year only,[4] can fulfill the FAA's reasonableness standard.

As we begin a more interactive engagement we would also like to discuss the potential for a graduated fee schedule and possible exemptions for aircraft with a maximum landed weight under 12,500 pounds.

LAWA Again Has Not Provided Sufficient Information Regarding the Predicates for the Fee

In calculating the revenues and expenses attributable to the airfield, the current letter continues to make allocations among the cost centers at VNY without any explanation – including why certain expense allocations have changed (all upward) since May. This shallow record provides no basis for the adoption of a landing fee. Transparency requires that the underlying data be shared with stakeholders, given the lacunae in the record. For example:

- The airfield is now assigned 19% of the airport's community relations costs (in contrast to 0% previously); the airfield is now assigned 65% of the airport's construction and maintenance service costs (in contrast to 31% previously); the airfield is now assigned 84% of the airport's operations costs (in contrast to 58% previously); the airfield is now assigned 67% of the airport's law enforcement costs (in contrast to 53.6% previously); and the airfield is now assigned 96% of the environmental performance unit and environmental regulatory compliance costs (in contrast to 85% previously). None of these changes are explained, much less substantiated by data. *See* Exhibit C-2.

- Exhibit E-1 asserts that all of the planned capital expenditures identified therein are based on pavement conditions at VNY, but includes the costs of replacing Airport Rescue and Fire Fighting (ARFF) equipment – so from the outset, this exhibit is not credible. Moreover, the ARFF costs are 100% allocated to the airfield, even though Exhibit C acknowledges that approximately 10% of ARFF expenses are attributable to commercial tenants. Once again, the BOAC simply cannot approve a landing fee that is based on facially unreliable data.

- Exhibit F-1, similar to Exhibit C-2, adjusts capital costs attributable to the airfield – again only in an upward direction, and again without explanation. Since May, the allocation for propellor aircraft aviation has increased to 100% (it was formerly 0%); the allocation for Bull Creek bridge and service has increased to 100% (it was formerly 84%); and the allocation for trunked radio communications improvement has increased to 100% (it was formerly 0%). Additionally, it allocates 100% of perimeter improvements to the airfield, even though the line item itself states that they only "primarily" benefit the airfield.

- Finally, according to Exhibit B-1, none of the non-aeronautical revenues at VNY are allocated to the airfield. **Non-aeronautical revenues should be used to subsidize <u>all</u> aeronautical activities**; no basis is cited by LAWA for assigning them exclusively to the commercial aeronautical cost center, and thus helping to keep it flush with cash while enhancing the nominal airfield deficit. This is impermissible creative accounting.

A significant new expense also is introduced into LAWA's calculations by the letter – an annual administrative fee to LAWA. The letter claims that it previously was built into the annual O&M costs assigned to VNY, but no supporting data is provided, so it is impossible for stakeholders to verify or analyze that proposition. Moreover, LAWA claims that it "undertook a detailed study" to justify the new administrative fee, but that study has not been provided – although it oddly does, yet again, increase the costs attributed to VNY, consistent with

[4] The November 14, 2025 letter commits to the $6.44 figure only through the end of FY2026, implying that it would subsequently impose the full, supposedly justified fee – which Exhibit A and other exhibits relying on its dataset anticipate will increase to $15.20 in FY2027 and eventually to $19.30 in FY2031 – facially unreasonable amounts.

LAWA's agenda of justifying an ever-higher landing fee. Indeed, the administrative costs for FY2026 exceed $7.4 million – more than a quarter of the airport's overall expenses – yet appear as a single, undifferentiated line item. A significant change in LAWA's methodology should not be buried in a footnote in reliance on secret data; the study process and outcome should have been public, to enable stakeholders to understand and vet its assumptions (for example, there are numerous administrative expenses with their own line items – stakeholders should be able to confirm that they have not been double-counted and not merely rely on LAWA's word).[5]

A further issue is that the letter inexplicably assumes that certain future capital projects at VNY will need to be funded entirely by LAWA; *i.e.*, 91% of the expenditures for projects listed for FY2026 would be grant-funded, but only 30% in FY2031. *See* Exhibit E. The only explanation put forward for this inconsistency is that the future projects are <u>high-cost</u>, but that is nonsensical; the size of a project does not render it ineligible for AIP funding – and the projects are no different in size from those in earlier financial years that are largely grant-funded. As a result, the letter significantly and artificially inflates future capex for the airfield, and likewise the (nominal) airfield deficit and need for a landing fee. There is no obvious explanation for this – other than LAWA is deliberately manipulating the numbers to achieve the outcome that it desires (*i.e.*, increasing expenses to justify landing fees), rather than the outcome that is best for the airport and its users.[6]

If not already evident, it is impossible for stakeholders – or for BOAC or the FAA – to properly analyze the proposal, because it is riddled with inconsistent data and other significant omissions. A further example: the budget adopted in June anticipated real estate revenue of $21,476,000 at VNY in FY2026 but the letter instead anticipates $20,445,000; no explanation is provided, despite the data allegedly being sourced from the adopted budget. The BOAC also approved an airport operating expense budget of $25,333,000, but the letter anticipates $29,447,000; again, no explanation is provided. Moreover, the letter's calculations overall fail to account for the 10% cut of landing fee revenue to be paid to Vector, putting aside any consequences that the imposition of a landing fee would have on operations and thus on landing fee revenue.[7] This deficiency was identified at the June 5, 2025 BOAC meeting, so it is simply inexcusable that it has not been corrected by LAWA. And there is also an assumption in Exhibit A that landing fees will be imposed for all of FY2026 – which is impossible, unless LAWA is proposing to collect them retroactively (which would raise significant legal issues).

In summary, the proposal lacks sufficient data to adequately rely upon for development of the landing fee methodology. If LAWA, as BOAC anticipated, had engaged with stakeholders, these issues potentially could have been resolved informally and collaboratively in the drafting process, but regrettably it is now necessary to – again – call out these failings in writing.

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[5] In further regard to O&M, the associations appreciate that LAWA now proposes to implement an O&M reserve fund on a rolling basis rather than in a single year – but fundamental problems remain, including that LAWA's annual financial reports have for years identified the existence of a single O&M fund without identifying it as LAX-only, an apparent violation of GAAP. Nor has LAWA explained why, if no O&M fund has been considered to be needed in the past for VNY, why it is needed now, after more than 75 years of operations by LAWA without one – or if the lack of an O&M fund was a transparent oversight by LAWA, why LAWA should now be trusted to oversee VNY properly.

[6] Additionally, for each of the 13 line items, the VNY portion of the funding for the future capital projects is different between Exhibit E and page 2 of Exhibit F; page 1 of Exhibit F also includes two line items each for "Runway 16R rehabilitation" and "Runway 16L-34R reconstruction & 16R-34L slurry seal project" without explanation.

[7] For example, Torrance recently imposed a landing fee for operations at Zamperini Field (TOA), which has had a significant impact on operations. *See, e.g.*, https://www.torranceairport.org/OPERATIONS/index.html.

LAWA Again Has Not Established that the Landing Fee Is Exempt from CEQA Review

The letter also asserts that the proposal is exempt from review under the California Environmental Quality Act (CEQA). Although there are certain exemptions to CEQA, LAWA has failed to establish that any of them are applicable. For example, even if the landing fee for present purposes were assumed to be a rate, toll, fare or charge consistent with the exemption that appears in 14 Cal. Code. Regs. § 15273, LAWA would be obligated to incorporate written findings of the exemption into the record. But the first mention of this particular exemption is in the November 14, 2025 letter, and not in the record previously created; nor is there any evidence that LAWA since has prepared the mandatory findings. Moreover, a catex is not to be utilized if there is a reasonable probability that there will be a significant effect on the environment (*see* 14 Cal. Code. Regs. § 15300.2(c)) – as is the case here, given the likely (but unstudied, as discussed above) diversion of transient aircraft to LAX based on its equivalent fee, and to other regional airports based on their significantly lower fees. *See also* footnote 7. "[A]n agency may not apply a categorical exemption without considering evidence in its files of potentially significant effects, regardless of whether that evidence comes from its own investigation, the proponent's submissions, a project opponent, or some other source." *Berkeley Hillside Preservation v. City of Berkeley*, 60 Cal.4th 1086, 1103 (2015).

LAWA Again Has Not Given Adequate Consideration to the Definition of a Based Tenant

Finally, although the November 14, 2025 letter in passing confirms that aircraft based at VNY would be exempt from the landing fee, it does not specifically address the associations' previously-identified concerns about the definition of that term, including but not limited to its impact on fractional operators. This is a prime example of an issue that could have benefited from LAWA adopting a truly collaborative approach to the evaluation of a landing fee for VNY, in contrast to the unilateral approach that it has pursued instead.

* * * *

Accordingly, given the continuing and new deficiencies in the landing fee proposal, the associations urge LAWA not to submit it to BOAC, but instead to engage with VNY stakeholders. At its June 5, 2025 meeting, BOAC President Karim Webb was emphatic as to why its consideration of the proposal was being deferred – *i.e.,* so LAWA staff can "continue discussions about the purpose of the landing fee with LAWA's partners in the Van Nuys aviation community, and stakeholders in the interest of transparency and collaboration." As we have elaborated earlier in the letter, there has not been adequate engagement of partners and stakeholders exacerbated by the lack of transparency and collaboration. Unfortunately, what LAWA has done in the past six months is not what it was instructed to do by BOAC, nor what the law requires.

Thank you for your time and consideration of our input. As you can see from the discussion above, the challenges are too complex and the effort that remains is too great to productively solve through only written communication. We hope that we can correct the path this process has been on and look forward to further interactive engagement and collaboration. Please do not hesitate to e-mail, call and text us to leverage the input of our members and our ability to engage with tenants and stakeholders and to take advantage of the experience and expertise of the association staff represented in this coalition.

We look forward to a productive 2026 and wish you, the LAWA team and your families a happy holiday season.

Sincerely,

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