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City of Whittier

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November 19, 2020

VIA EMAIL AND US MAIL

Ms. Raquel Girvin Regional Administrator, AWP-1 FAA Western-Pacific Region 777 South Aviation Boulevard, Suite 150 El Segundo, CA 90245

Subject: Concerns over Proposed Rerouting of LAX Traffic Over Western San Bernardino County and Eastern Los Angeles County

Dear Ms. Girvin:

This letter is written to present our comments and concerns regarding the proposal presented at the March, July, and September 2020 meetings of the LAX Community Noise Roundtable for revised routing of north downwind arrivals to Los Angeles International Airport. Three alternative flight path proposals, Options A, B and C, were initially presented by the community group Quiet Skies LA. The group is now requesting that their preferred proposal, Option B, be supported by the LAWA Roundtable for presentation to the FAA for consideration. We have strong concerns regarding this proposal.

The proposed Option B arrival is depicted graphically below in green in a slide from presentations provided at the Roundtable meetings. This routing would replace those using the current procedures (in red) over Malibu, Santa Monica, and Los Angeles before reversing course for final approach to Los Angeles International Airport (LAX).



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The proposed Option B would be used by southbound arrivals currently using the HUULL TWO or IRNMN arrival procedures. This procedure would bring numerous new flights per day over our community on this approach to LAX. Flights would intersect the LAX instrument approach at about 11,000 feet over the region. This would adversely affect all eastern communities with increased air pollution, more noise, air traffic delays, and safety impacts. Following are specific issues with the Option B proposal.

- More than 300 LAX arrivals (36 percent of all LAX arrivals) would be rerouted over the eastern region disrupting air traffic to and from Ontario International Airport and other local airports, while diminishing air safety by increasing air traffic congestion and controller workload.
- The proposal would increase noise and air pollution (CO2 tonnage) by extending and prolonging flights over the Eastern Los Angeles San Bernardino Basin.
- The proposal would unnecessarily prolong flight times, potentially delay arrivals, and consume unnecessary fuel. The extent of delays from the proposal is substantially understated.
- The proposal would further economically burden the airlines and passengers by increasing costs at a time of extreme economic challenge for the airlines and flying public.

I am a person who utilizes LAX, LGB and ONT for travel within and without California. I closely observe air traffic control and traffic flow in this region. It is my understanding that it was only recently that the FAA began vectoring a number of aircraft over Catalina, Huntington Beach, Southeast Los Angeles County to flow into the LAX pattern. The FAA had the ability to do this as result of new satellite infrastructure. Many of these flights are aircraft coming in from the Northwest and the North Pacific (Japan, Philippines, China, etc.). Before this new satellite technology, the same aircraft would be vectored over Malibu and then directed eastward over Santa Monica, Brentwood, Los Angeles and then into the normal pattern for landing at LAX. I have the Flightradar 24 application and physically view the vectoring of these aircraft. I am sure that this has been helpful for the people of Quiet Skies LA but it comes at the expense of communities in Orange County and Southeast Los Angeles County, including Whittier. Even with this new vectoring, we now have Option B, being pushed which will further exacerbate the situation. This is not fair to my community nor is it fair to the many, many, people impacted in Eastern Los Angeles County and San Bernardino County.

For these reasons, we respectfully request that you disapprove the proposal for New North Downwind Arrival Flight Paths to LAX. The claim of an environmental benefit from the new route is false. Obviously, there is an air quality detriment from extending the length and duration of the approach path, and no real noise benefit by distributing the noise away from one area to over a much larger area. While it is preferable to reject this

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proposal directly, at the very least an environmental assessment of air quality and noise impacts is warranted by modeling with the FAA's Aviation Environmental Design Tool (AEDT).

Thank you for your consideration of our concerns over this proposal.

Sincerely, thal Joe Vinatieri

cc: Dennis J. Schneider, Chair, LAX/Community Noise Roundtable