



September 24, 2012

Mr. William C. Withycombe  
Regional Administrator  
Federal Aviation Administration  
Western-Pacific Region AWP-1  
P.O. Box 92007  
Los Angeles, CA 90009-2007

RE: Recommendations for FAA Consideration in the *Optimization of Airspace and Procedures in the Metroplex* process

Dear Mr. Withycombe:

I would like to first thank you and your staff on behalf of the members of the Los Angeles International Airport/Community Noise Roundtable (Roundtable) for your continuing support of our efforts in addressing aircraft noise that affects the communities surrounding Los Angeles International Airport (LAX). With your support, we have achieved tremendous progress in reducing noise exposure over the last decade. The Roundtable would like to continue working with you in exploring new procedures and other ways to further reduce noise from LAX aircraft operations.

As you know, the Roundtable is a voluntary and independent body that consists of membership from local elected officials and staff, representatives of congressional offices, members of recognized community groups, the airlines, the Federal Aviation Administration (FAA), and Los Angeles World Airports (LAWA). These parties work together to identify noise issues that affect communities surrounding LAX and to seek feasible solutions to reduce noise over those affected communities.

A recent announcement indicates that the FAA is starting the second phase of the *Optimization of Airspace and Procedures in the Metroplex* (OAPM) project for the Southern California area on October 15, 2012. Since the purpose of this project is to optimize flight procedures and improve airspace efficiency, the Roundtable believes that an opportunity may be available during this process for the FAA to explore options that may help reduce noise impacts from LAX aircraft operations. As such, we have reviewed our Work Program to identify those noise issues that may be alleviated by recommending changes during this optimization of airspace and procedures for Southern California. The identified noise issues are discussed below along with the recommended changes to the associated procedures for FAA consideration.

**Work Program Item A7: Extended Downwind Approach**

Aircraft arriving to LAX from the west and the north utilize an extended downwind approach at times causing aircraft to overfly Monterey Park and neighboring communities at low altitudes. In November 2002, the Roundtable requested FAA to look into several mitigation measures such as increasing the aircraft altitude and applying speed controls and delays to aircraft to avoid overflights over Monterey Park. However, the FAA did not implement the suggested mitigation

measures and indicated that the only possible solution to this problem may be available through the Airspace Redesign process.

Recommendations:

Since the 2<sup>nd</sup> phase of the OAPM project is taking place and the objective is similar to that of a comprehensive airspace redesign, the Roundtable believes this is the most appropriate time to recommend the following changes:

- 1) Increase the minimum altitude as much as possible for aircraft on the extended downwind and base legs of the approach to reduce noise exposure for residents of Monterey Park and surrounding communities.
- 2) Explore options to reduce the requirement of using the extended downwind approach as a way to minimize overflights over Monterey Park.

**Work Program Item A10: Turboprop Community Overflights**

Turboprop aircraft departing to the south with destinations to the east overfly the Palos Verdes Peninsula while heading to the Seal Beach VOR. The Roundtable acknowledges that in 2002, the FAA has successfully routed most turboprops off the Peninsula with the exception of those aircraft heading to eastern destinations. More recent FAA mitigation efforts involved the development of an RNAV procedure called the JEDDD with the intent to reroute those turboprops on offshore routes further away from the Peninsula. However, the FAA subsequently indicated that the JEDDD procedure could not be implemented because, through testing, they were not able to maintain aircraft separation requirements.

Recommendations:

The Roundtable is still very interested in seeing the implementation of the JEDDD RNAV procedure and looking at ways to re-route the remaining turboprops offshore. As such the following changes are suggested:

- 1) Explore options of redesigning the JEDDD procedure that will meet all necessary requirements to allow full implementation of the procedure.
- 2) Reroute the remaining turboprop aircraft that are currently overflying the Peninsula to offshore routes.
- 3) If option 2 proves infeasible, then increase the minimum altitude of turboprop aircraft that overfly the Peninsula.

**Work Program Item A6: Improperly Flown LOOP Departures**

Aircraft on the LOOP departure sometimes deviate from the procedure by not overflying the LAX VOR as prescribed; instead they overfly the Beach Cities causing noise disturbances to these communities. In 2004, the FAA developed the KWYET RNAV departure procedure in an effort to tighten LOOP operations. However, the FAA later had to eliminate the procedure due to the issue with the turn being greater than 210 degrees.

Recommendations:

With the advanced technology that is available in the aviation industry today, we believe that it may now be possible to develop procedures or new ways to improve the loop operations and request the FAA to:

- 1) Re-investigate the possibility of establishing the LOOP RNAV/RNP procedure to help "tighten" the loop operations.

- 2) Look into other possibilities to improve the compliance of the LOOP departure procedure through the FAA OAPM process.

**Work Program Item A3: Early Turn of Aircraft Departing to the West**

Aircraft departing to the west from LAX turn before crossing the shoreline causing community overflights and noise disturbances. Some issues that may cause early turns include avoiding wake turbulence or maintaining aircraft separation requirements for safety, and difficulty for pilots to identify the shoreline during IFR conditions. In 2007, LAWA worked with FAA to resolve an issue with the RNAV procedures that was causing aircraft to turn early. More recently, LAWA has increased its effort with its Early Turn Notification Program by sending notices to aircraft operators on a more frequent and timely basis.

**Recommendations:**

The Roundtable would like to pursue this issue further and requests the FAA to:

- 1) Explore options that could help pilots and controllers to reduce early turn operations.
- 2) Explore the possibility of adding a waypoint in the RNAV procedures or other emerging technologies to assist pilots in identifying the shoreline during IFR conditions that could in turn help reduce early turns.

**Work Program Item A11: Continuous Descent Approaches at Lower Altitudes**

Residents from La Habra Heights reported that they noticed aircraft arriving into LAX are flying lower after the FAA implemented the CDA in late 2008. They also noticed an increase in noise levels. LAWA and FAA conducted altitude analyses on LAX arrivals and confirmed that aircraft are flying lower than before. The Roundtable then asked the FAA about the possibility of increasing the altitudes for aircraft on the CDA. FAA indicated it cannot make that change because aircraft would need to be within the 3-degree glide slope requirements. The agency further explained that aircraft are flying lower because the minimum altitude for the navigation fix, FUELR, was lowered to allow aircraft to intercept the ILS from below instead of from above to increase safety.

**Recommendations:**

As this issue is still not resolved and remains an important matter for the La Habra Heights community, the Roundtable requests that the FAA consider the following recommendations in the OAPM process.

- 1) Re-investigate the possibility of increasing the altitudes for aircraft on the CDA.
- 2) Explore other possible solutions to resolve this issue.

As the FAA is exploring and evaluating options and procedures during this process, please also consider reviewing the enclosed documents pertaining to the preservation of natural environment and the National Park Service's consideration of the Puente-Chino Hills Wildlife Corridor as part of the National Park System to ensure that proposed procedures are in compliance with FAA Order JO 7400.2J - Procedures for Handling Airspace Matters.

Thank you very much for considering these recommendations for reducing the noise impact in communities through the OAPM process. The Roundtable members believe that these actions have potential benefits for many communities and are worthy of your consideration. We also appreciate your past cooperation in pursuing opportunities for reducing noise impacts in our

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communities through various means, such as developing a new RNAV to shift aircraft offshore, and look forward to your continued efforts to afford such opportunities in the future.

The position stated in this letter is the opinion of the majority of the membership of the Roundtable and is not the official position of the Federal Aviation Administration, the City of Los Angeles or Los Angeles World Airports.

Sincerely,

A handwritten signature in black ink, appearing to read "Denny Schneider". The signature is fluid and cursive, with a large initial "D" and "S".

Denny Schneider, Chairman  
LAX/Community Noise Roundtable

Enclosures

cc: Steve May, FAA