Los Angeles International Airport Community Noise Roundtable

LAX Departure Overflights of Palos Verdes and San Pedro

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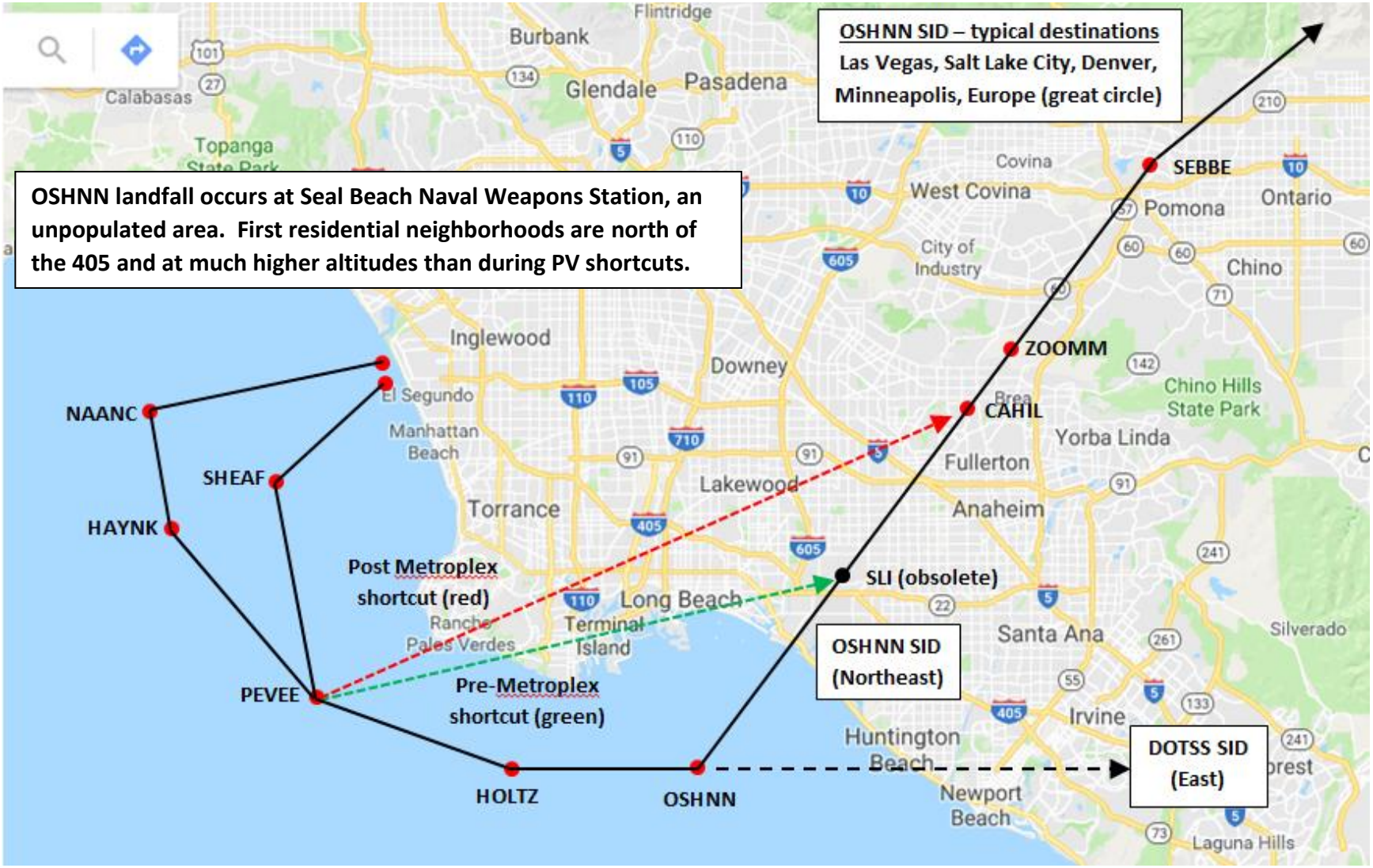
6 March 2018

Summary of Key Points

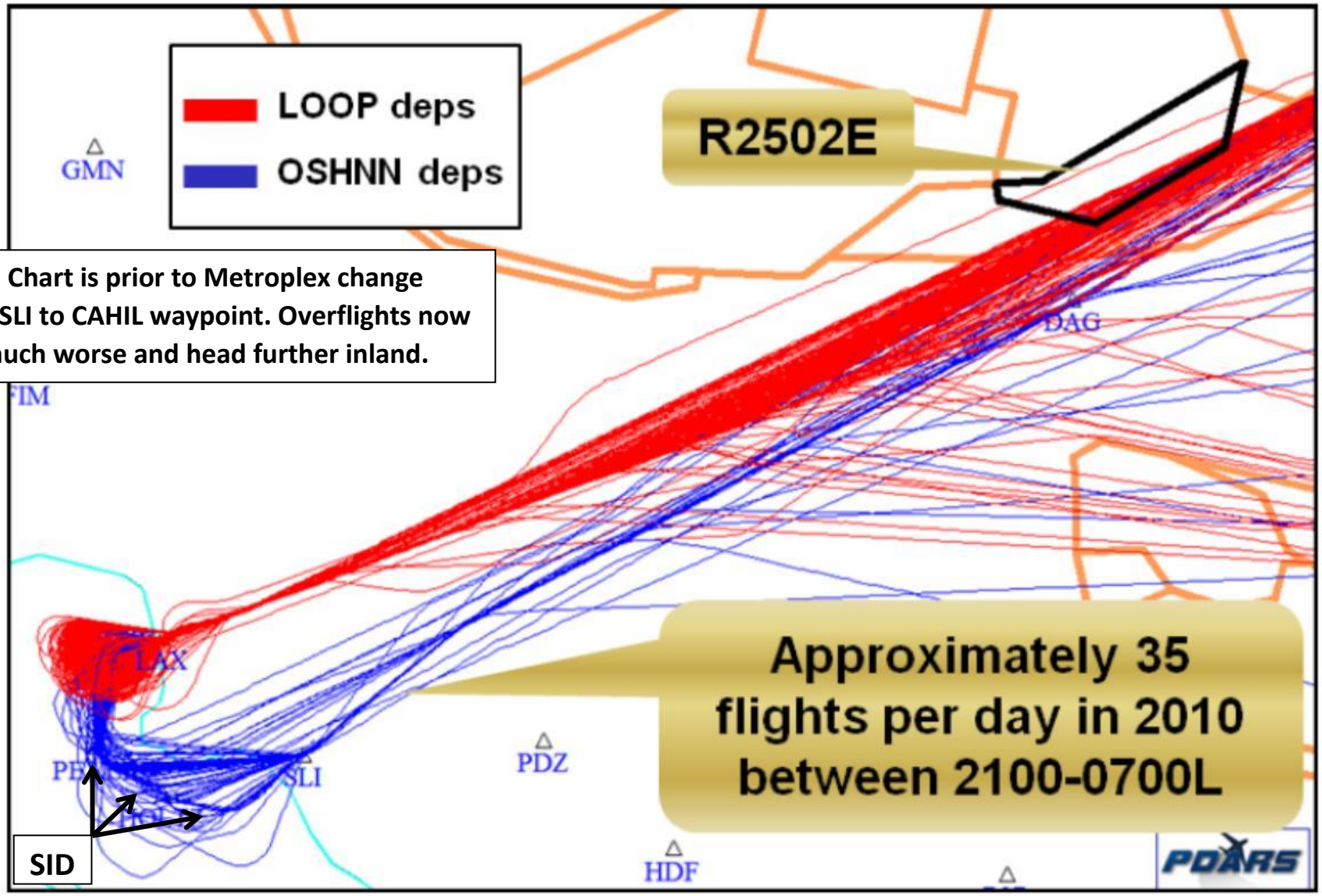
- LAX Departure overflights of South Palos Verdes and San Pedro have increased dramatically since NextGen Metroplex was implemented
- Rountable staff identified movement of the OSHNN departure waypoint from SLI (Seal Beach) to CAHIL (Fullerton) as the cause
- In truth, the actual root cause is that the FAA is ignoring their own documented standard instrument departure procedure (OSHNN8 SID)
    - OSHNN was designed for noise abatement, it keeps aircraft offshore longer and makes landfall over an unpopulated area
    - Yet over 70% of the time, SoCal TRACON vectors low flying departures off the SID and over Palos Verdes and San Pedro neighborhoods
    - How can a “standard” departure “require” so much shortcutting?
- Studying flight patterns and Air Traffic Control communications makes clear this is happening for ATC and pilot convenience (not “required”)
- The FAA wants it both ways. OSHNN8 looks good on paper for noise abatement, but the de-facto SID is over Palos Verdes and San Pedro homes
- The FAA must follow its own documented procedures

OSHNN8 Standard Instrument Departure (SID)
Source of Most Palos Verdes and San Pedro Overflights



OSHNN SID designed for noise abatement yet ATC routinely shortcuts noisy departures over PV and San Pedro Residential Neighborhoods

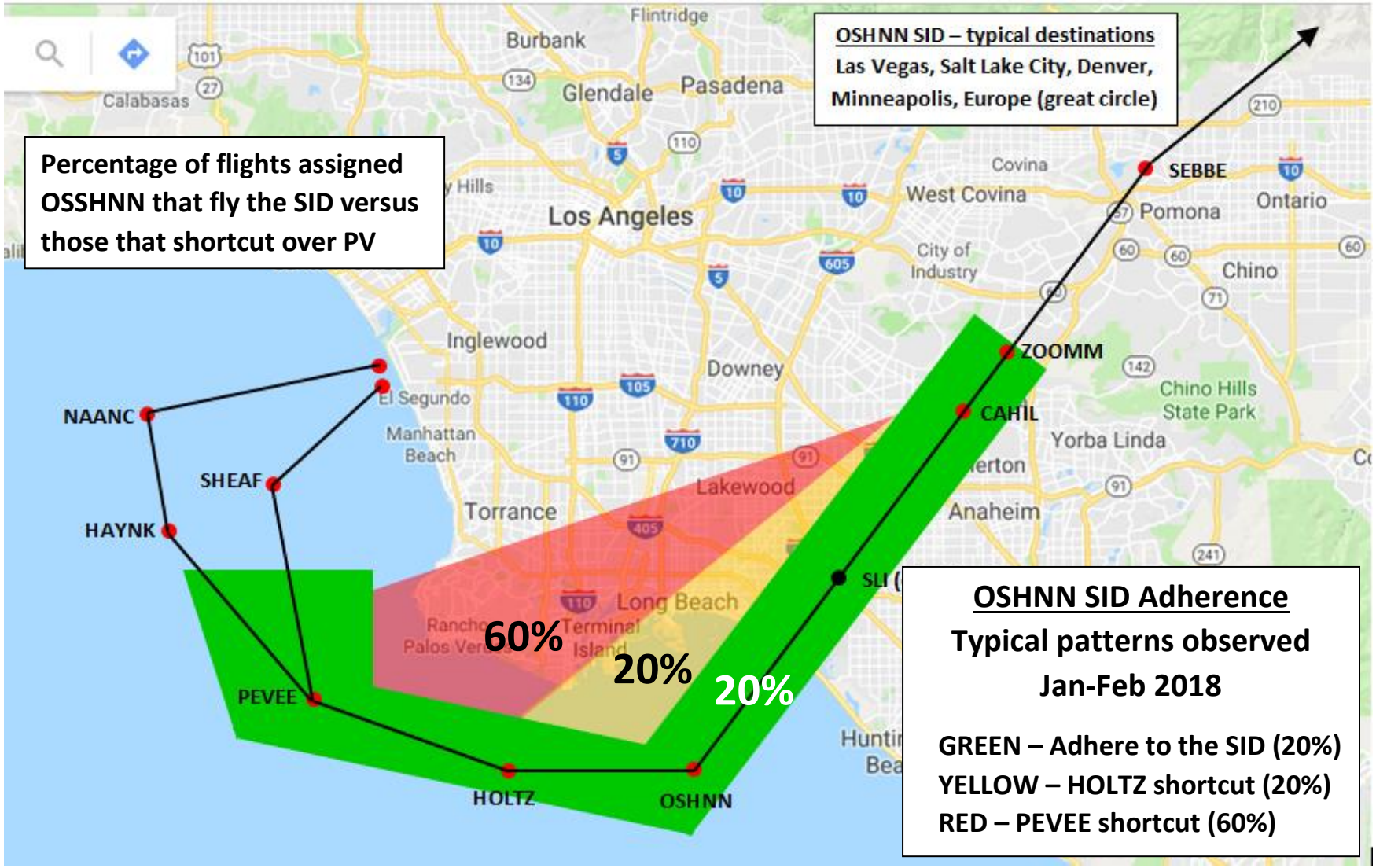
Over 70% of OSHNN Departures shortcut over/near the PV Peninsula



Note: Chart is prior to Metroplex change from SLI to CAHIL waypoint. Overflights now are much worse and head further inland.

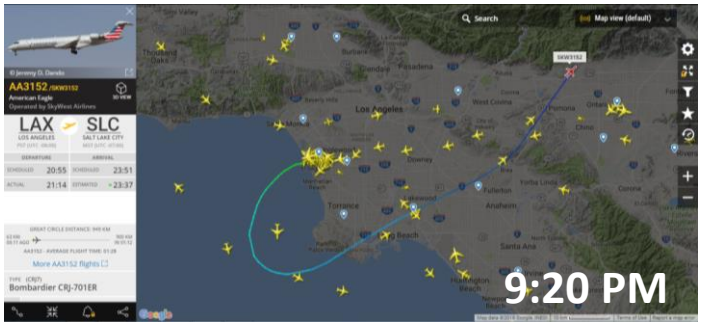
Graphic from the Metroplex Technical Report shows OSHNN Departures and prevalence of SID Shortcutting

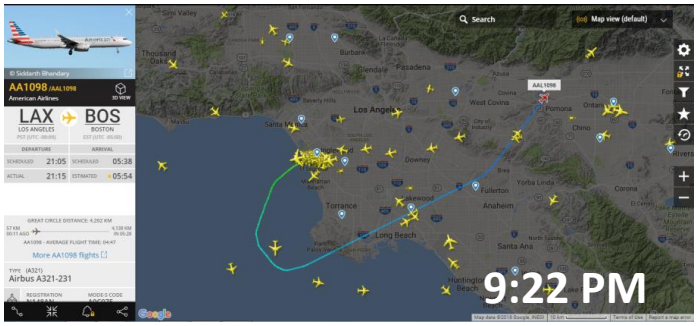
The OSHNN SID is a “Standard Departure” in name only

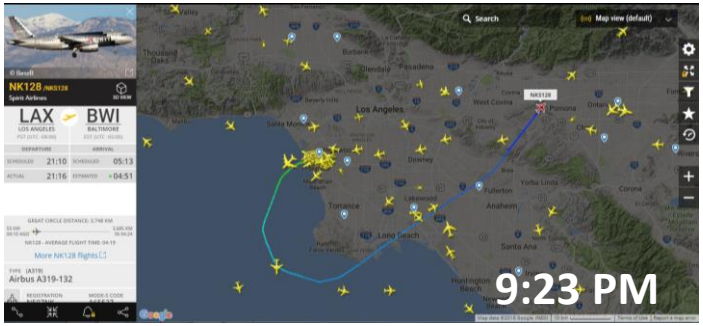


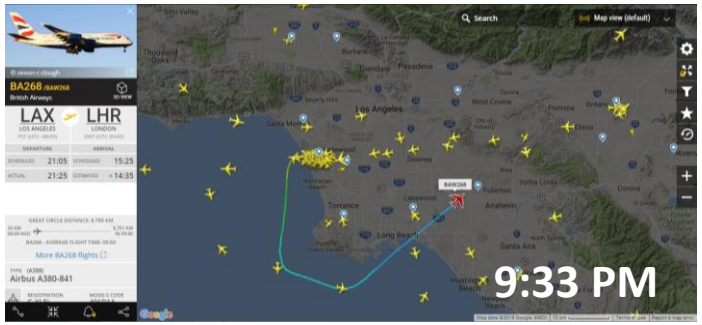
FAA claims OSHNN is the “standard” departure to satisfy noise abatement requirements <u>but doesn’t follow its own documented procedures</u>

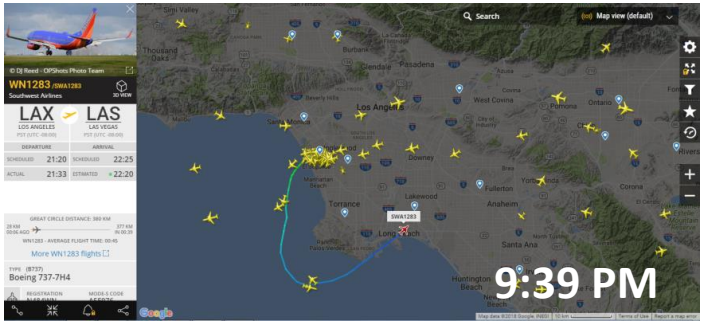
OSHNN Shortcuts – Jan 19th, 9:20 PM to 10:02 PM

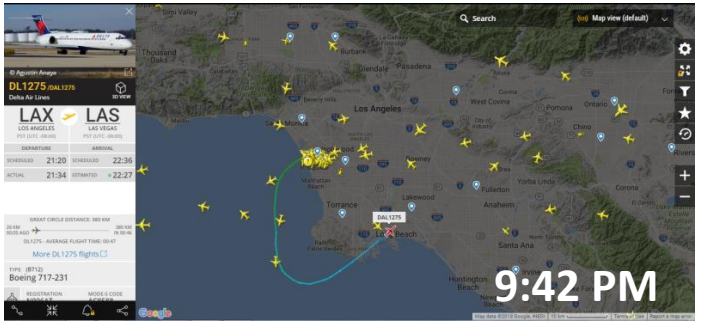


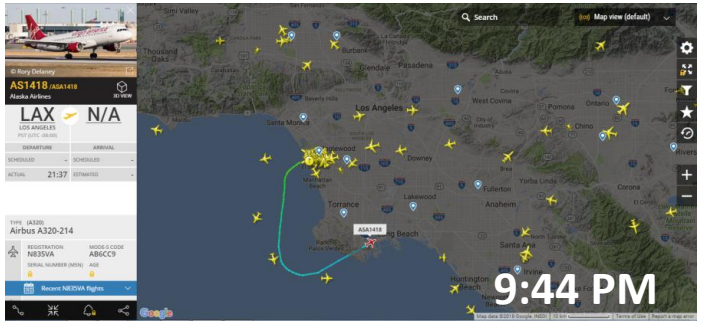


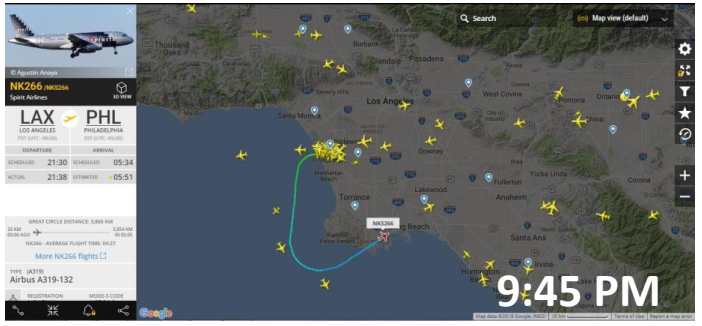








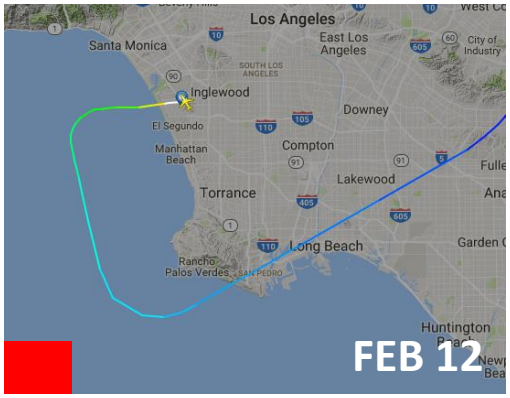


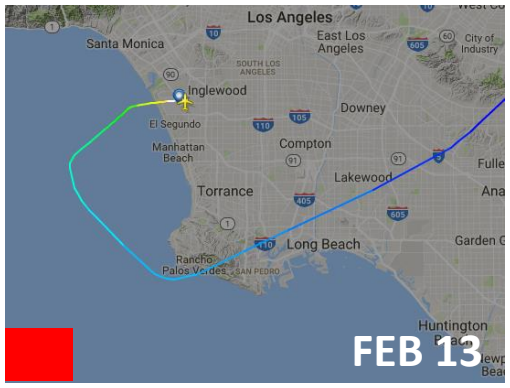


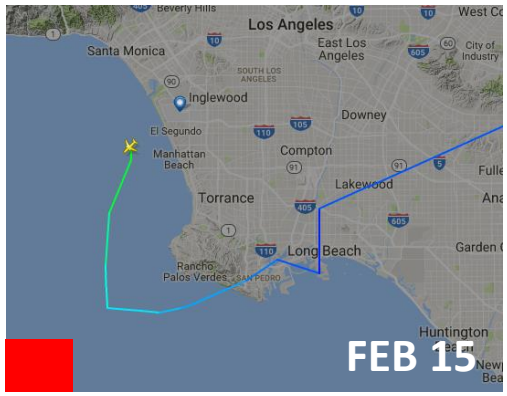
During this evening period, <u>not a single flight correctly flew the SID</u>, all shortcut over or near Palos Verdes

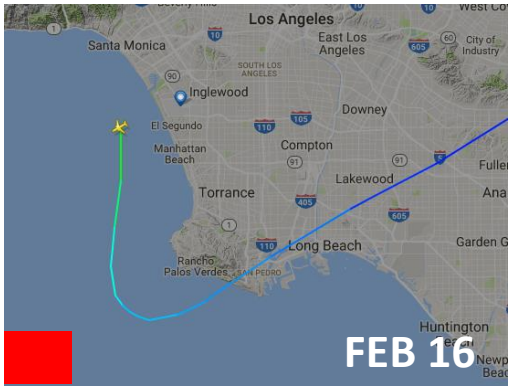
During peak OSHNN usage aircraft can overfly PV every 2-3 minutes

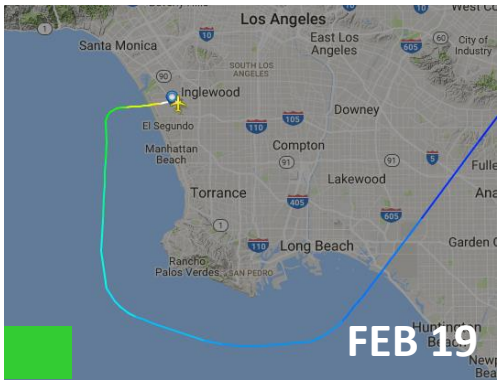
Case Study – Southwest 1283 (LAX → LAS, 9:23 PM Departure)

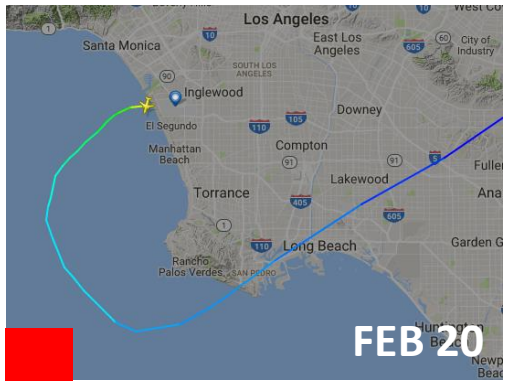


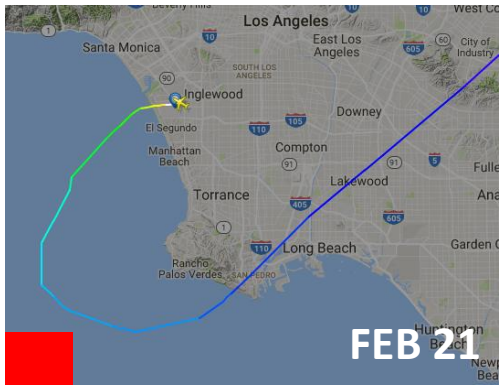


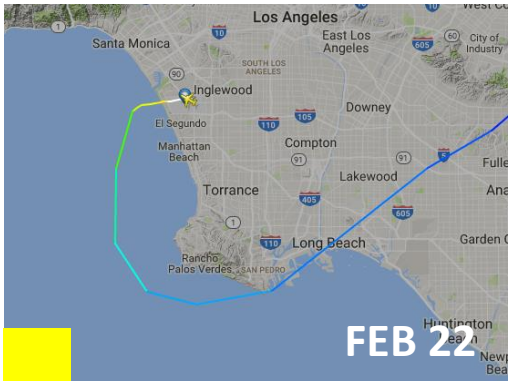


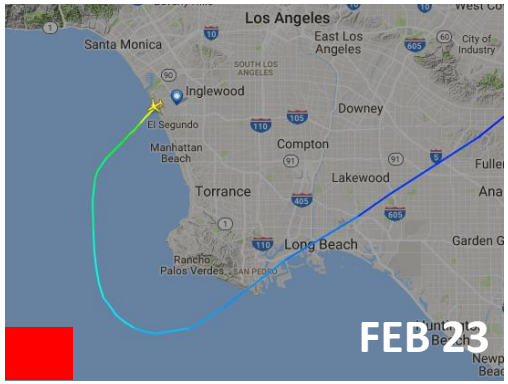


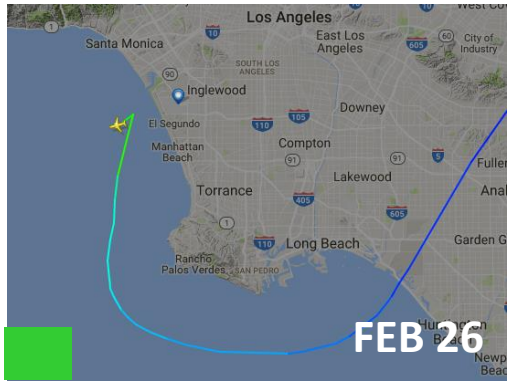


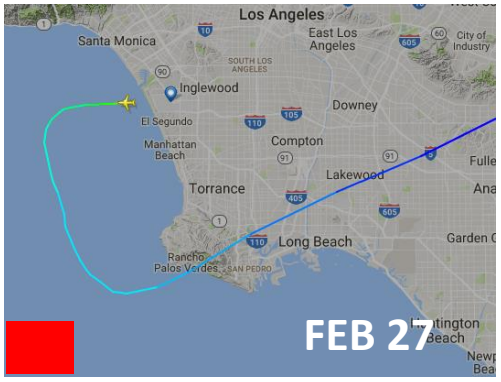


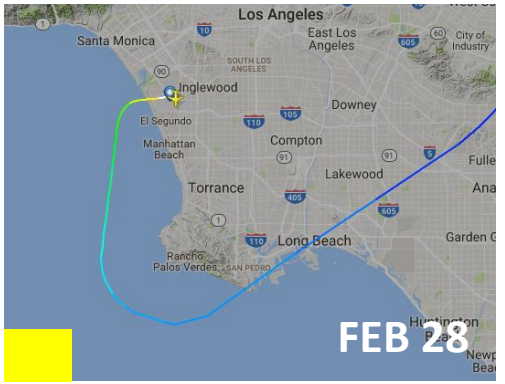








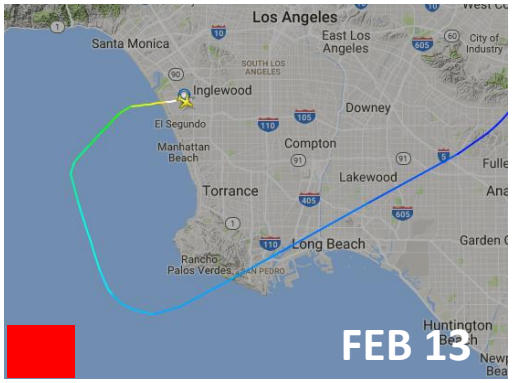


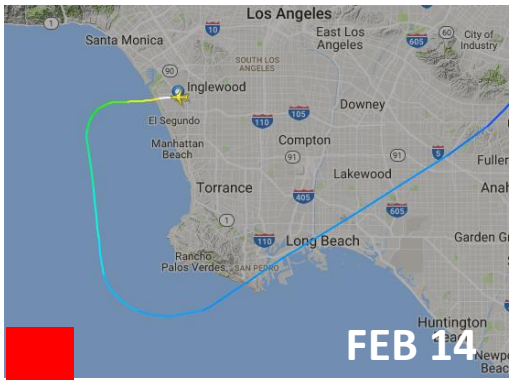


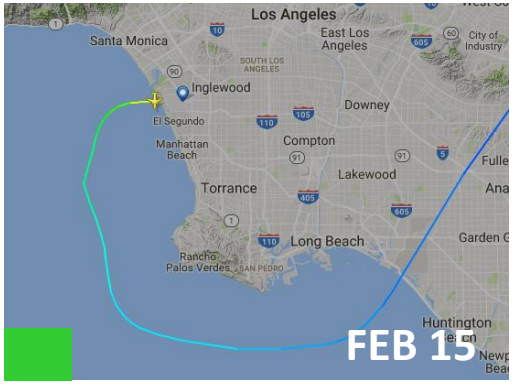
Out of 12 flights, 8 overflew Palos Verdes/San Pedro (67%)

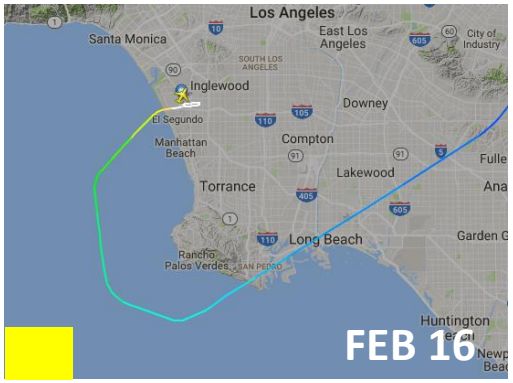
2 flew the SID (green), 2 HOLTZ shortcut (yellow), 8 PEVEE shortcut (red)

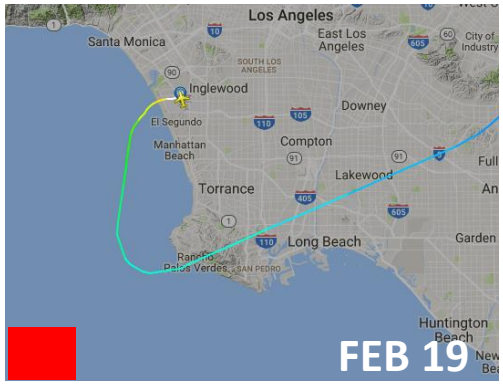
Case Study – Delta 1404 (LAX → SLC, 6:00 AM Departure)

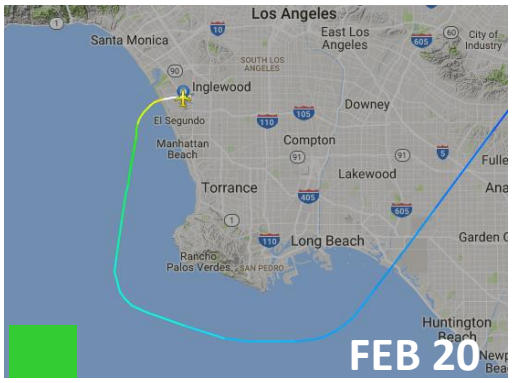


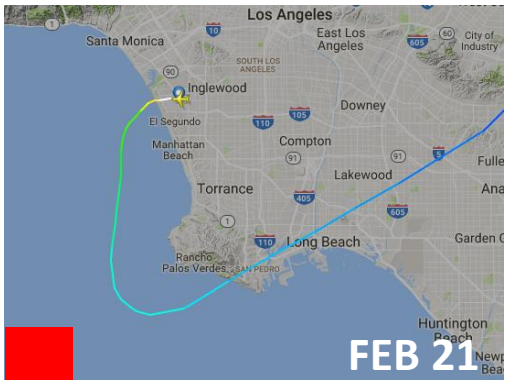


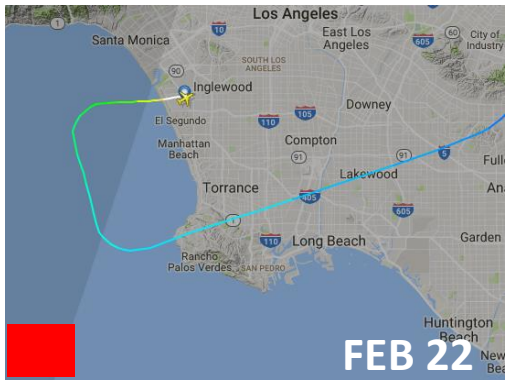


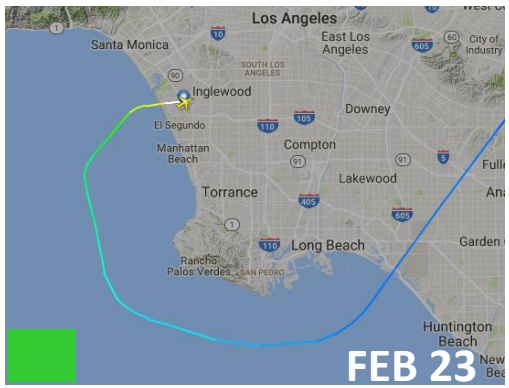


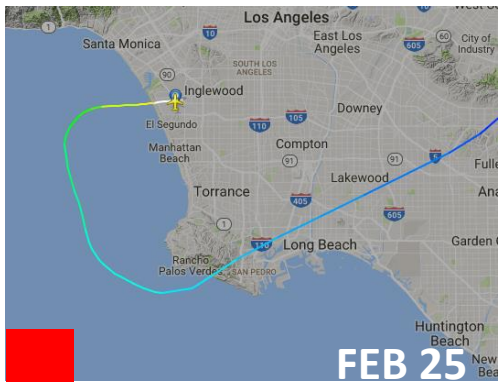


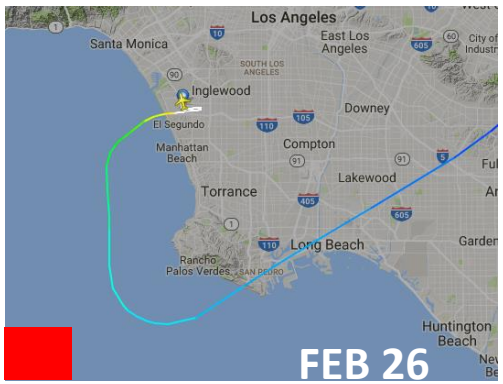


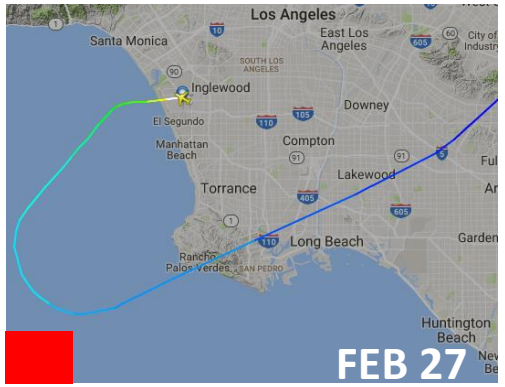












Out of 12 flights, <u>8 overflew Palos Verdes/San Pedro (67%)</u>

3 flew the SID (green), 1 HOLTZ shortcut (yellow), 8 PEVEE shortcut (red)

Why is This Happening? (ATC Vector "Direct to CAHIL")

Regarding PV overflights, the July 2017 LAX Noise Roundtable report stated:

> *"FAA determines whether aircraft remain on RNAV procedure (OSHNN 7) or they vector them to another waypoint (e.g., CAHIL) when required for spacing"*

Evaluation of flight patterns and monitoring SoCal TRACON communications with aircraft shows this is not "required" but being done for convenience

- If OSHNN truly "requires" deviation over 70% of the time then frankly it isn't safe
- Yet the Metroplex report didn't even mention these deviations and recommended no changes to the OSHNN SID

The Metroplex technical report hints at what is really going on:

> *"Another major issued raised by both ATC and industry stakeholders is the inefficiency of using the OSHNN SID between 2100 and 0700, which adds between 14 NM to 23 NM to the route compared to the LOOP SID."*

ATC and pilots don't like OSHNN because it's inconvenient. "Direct to CAHIL" is a free pass at Palos Verdes and San Pedro resident's expense

Why is This Happening? (ATC Vector "Direct to CAHIL")

Why would ATC and pilots want to shortcut the OSHNN SID?

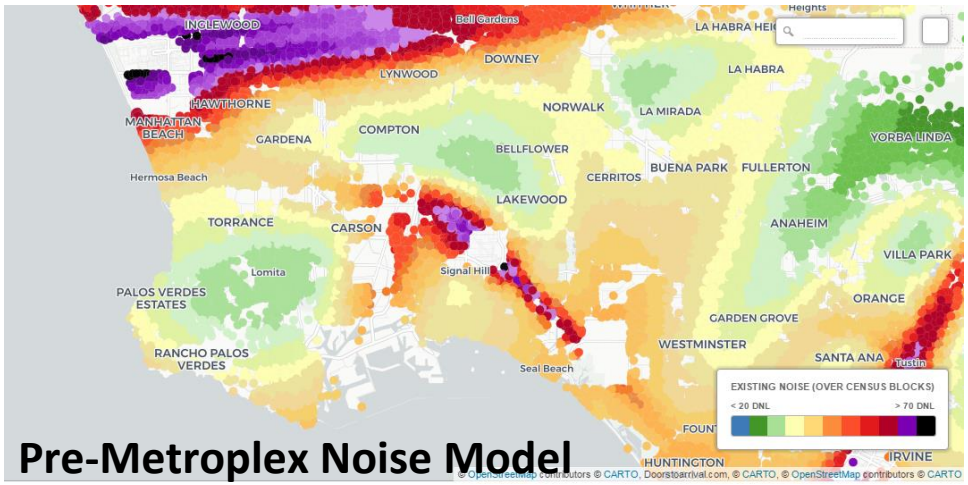
- OSHNN is longer and takes more time – particularly if the aircraft had originally filed for the ORCKA (loop) departure
- OSHNN is complex and slower – three turns, at PEVEE, HOLTZ, and OSHNN
- OSHNN is busy – PEVEE to OSNNH leg shared with the DOTSS departure
  - More ATC intervention needed to de-conflict with DOTSS traffic
  - Speed restrictions often needed to maintain separation
  - Altitude restrictions due to Long Beach (LGB) southern departures
- OSHNN delays ATC hand-off from SoCal TRACON to LA Center (ZLA)

Since there is no PV air traffic, "Direct to CAHIL" is a free pass SoCal TRACON uses to make these concerns go away, rarely is it "required for spacing"

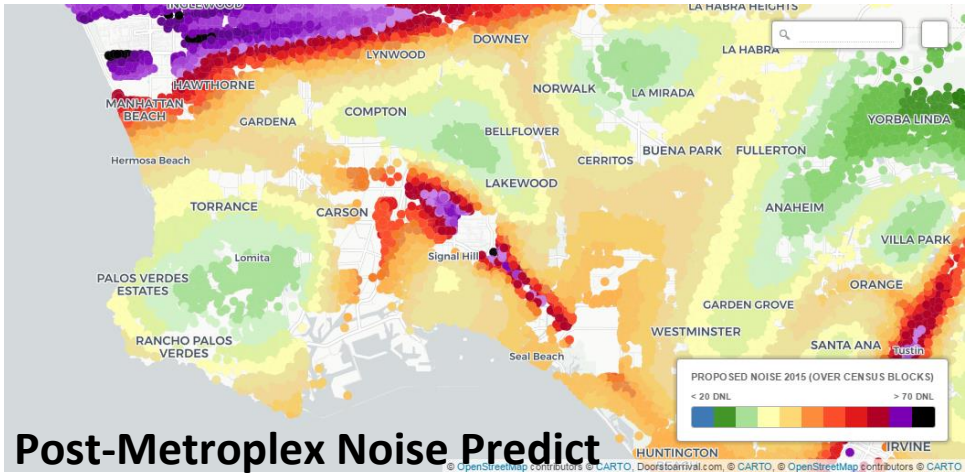
"Direct to CAHIL" allows the FAA to have its cake and eat it too

- OSHNN SID looks good on paper and meets noise abatement requirements
- In reality, ATC routinely ignores it and the de-facto SID is over my house and thousands of others. The FAA isn't following its own procedures.

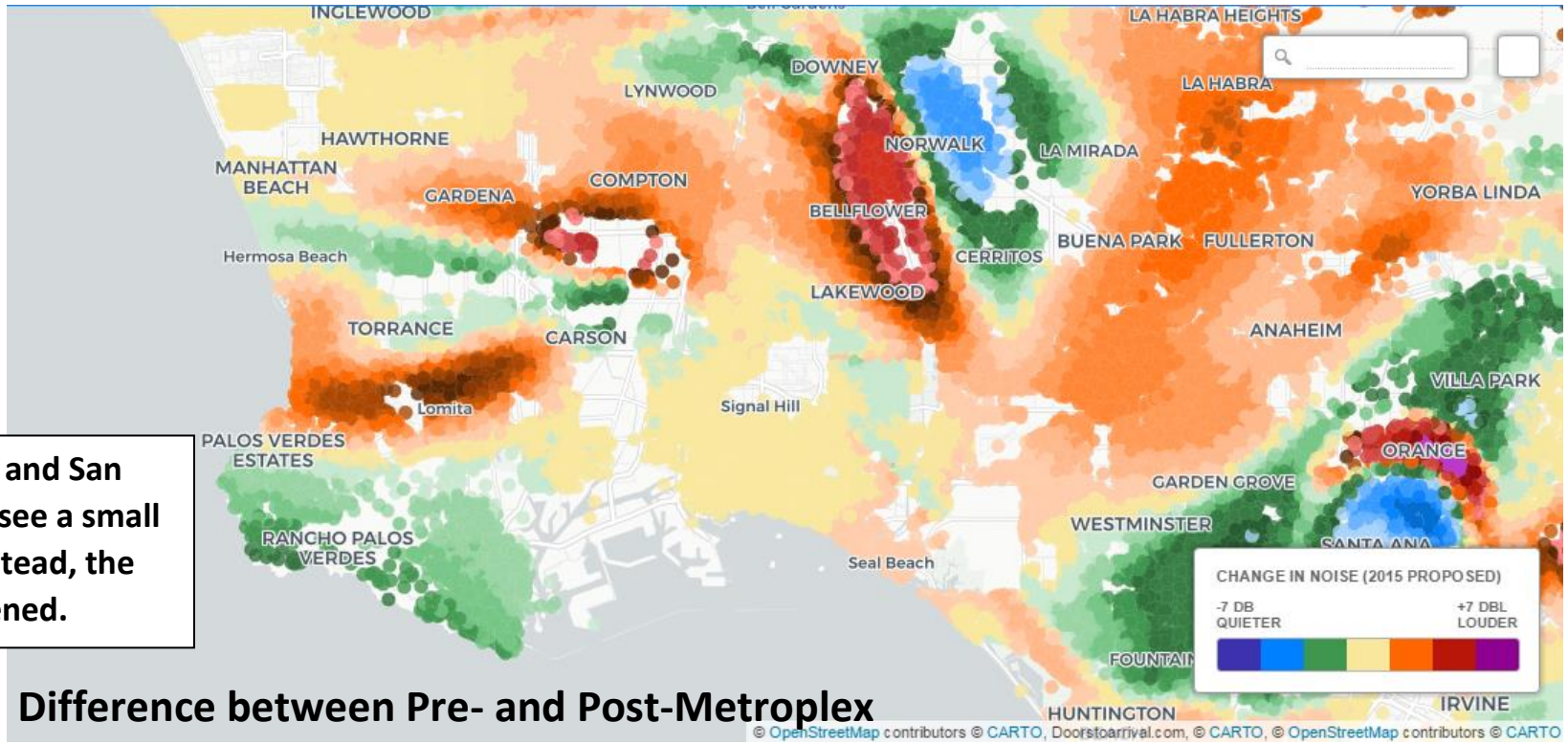
Metroplex Analysis Predicted a Noise Decrease for South PV and San Pedro



Pre-Metroplex Noise Model



Post-Metroplex Noise Predict



Difference between Pre- and Post-Metroplex

South Palos Verdes and San Pedro predicted to see a small noise decrease. Instead, the opposite has happened.

Noise Model didn't consider that the OSHNN SID is ignored >70% of the time

We Need Action NOW, Not More Studies!

The noise over Palos Verdes and San Pedro has increased dramatically and the FAA owes us some answers:

- Why isn't the FAA following its own documented OSHNN8 procedure?
- How can the OSHNN SID be a "standard" departure when it is ignored over 70% of the time? (definition of "standard": *used or accepted as normal*)
- Why does SoCal TRACON think it's acceptable to routinely vector noisy low-altitude jet departures over thousands of residential homes?
- Why did the Metroplex analysis predict a decrease in Palos Verdes Peninsula noise levels when the opposite has happened?
- Why did the July 2017 report characterize these OSHNN deviations as "required for spacing" when the overwhelming majority clearly aren't?

We don't need another year of studies! <u>We need the FAA to follow its own documented procedures now</u>.

No more "Direct to CAHIL" vectoring, particularly before the HOLTZ waypoint!

No deviations from the OSHNN SID unless there is a clear and compelling requirement to do so for <u>safety</u>.