



September 2, 2015

SoCal Metroplex EA  
Federal Aviation Administration  
Western Service Center - Operations Support Group  
1601 Lind Avenue SW  
Renton, WA 98057

RE: Comments on the Draft Environmental Assessment for Southern California Metroplex Project

Dear Sir or Madam:

The Los Angeles International Airport/Community Noise Roundtable (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, airlines, Los Angeles World Airports (LAWA), and the Federal Aviation Administration (FAA) as a non-voting member. These parties work together to identify noise issues that affect communities surrounding Los Angeles International Airport (LAX) and seek feasible solutions to reduce aircraft noise in those affected communities.

The Roundtable recognizes the FAA's efforts to improve efficiency and enhance safety in the Southern California airspace by developing approach and departure procedures that take advantage of satellite-based navigation technology. These new satellite-based procedures are intended to enable aircraft to fly more efficient, direct routes and enhance safety through improved predictability and repeatability of procedures. The new procedures will also change where and how aircraft fly and may potentially affect the residential communities.

The FAA prepared the Draft Environmental Assessment (EA) for the SoCal Metroplex Project to document the potential environmental effects associated with the proposed procedures and initially provided the public with 30 days to review and submit comments. After receiving a number of requests, the FAA extended the public comment period by 60 days with a new deadline of September 8, 2015. The Roundtable appreciates the FAA extending the comment period to allow the public additional time to review and provide comments regarding the potential environmental impacts of the project.

#### Roundtable's Concerns and Suggestions

The specific comments contained in this letter are not intended to be comprehensive, but instead are representative of the general concerns that this body has identified. The Roundtable is concerned that if the Metroplex procedures are implemented as proposed in the EA, they will result in: 1) shifting noise from one community to another; 2) exposing new residential areas to aircraft overflights; 3) lowering aircraft altitudes over certain communities; and 4) creating a concentration of flights over a narrower area when compared to the existing conditions.

### *Shifting and Exposing Noise to New Residential Areas*

Some of the most prominent changes with the proposed procedures occur during east flow operations with the two main LAX arrival routes, used by aircraft arriving from the east, shifted north and south of their current location by 2.3 and 1.6 nautical miles, respectively, on the LAX BIGBR1 and BRUEN1 STARs. These proposed arrival procedures will cause aircraft to fly over residential areas that did not previously experience aircraft overflights. In addition, the proposed departure procedures for east flow operations will shift noise from one location to another. For example, the LAX TRTON1 SID directs aircraft to make tighter turns after departure toward the east, resulting in shifting of noise that affects the beach cities. The LAX GARDY1 SID directs aircraft heading eastbound to fly a route that will expose residential areas that do not routinely experience departures from LAX to new aircraft overflights. These proposed changes are significant enough to cause residents to notice a change in flight patterns even though east flow operations only occur about five percent of the time during the course of a year.

To help minimize noise exposure associated with these and other proposed changes that result in shifting and exposing noise to new residential areas, the Roundtable suggests that the FAA reduce the shifting of aircraft routes where possible and develop procedures that mimic current flight routes as much as possible. If modification to existing routes is required, consider routing aircraft over commercial and industrial areas instead of residential areas to avoid noise exposure to the residential neighborhoods.

### *Aircraft Flying at Lower Altitudes*

Some of the proposed changes will cause aircraft to fly at lower altitudes over certain communities. The FAA created the CLIFY waypoint to replace the SMO VOR for the purpose of satellite navigation. Aircraft arriving to LAX normally fly over the SMO VOR at 7,000 ft. during Westerly Operations (normal daytime traffic pattern) and at 8,000 ft. during Easterly Operations (wind conditions) and Over Ocean Operations (normal nighttime pattern from midnight to 6:30 a.m.). With the proposed changes, aircraft will fly over the CLIFY waypoint at 7,000 ft. regardless of the traffic flow configuration. This will cause aircraft to fly 1,000 ft. lower during Easterly Operations and Over-Ocean Operations, creating a noticeable change for this area community that is already sensitive to the high volume of air traffic descending for arrival.

Another example of aircraft flying at lower altitudes is associated with the proposed LAX LADY J departure procedure. This procedure will lower the altitude requirement for aircraft flying over Malibu. As proposed, aircraft will cross the waypoint LADYJ located in Malibu at 8,000 ft. rather than the existing GHART waypoint at 9,000 ft. Aircraft will be flying 1,000 ft. lower over Malibu and cause residents to notice a change in altitude.

The Roundtable recommends that the FAA maintain existing altitude requirements for the SMO VOR (CLIFY waypoint) and the LADYJ waypoint. Residents will indubitably notice aircraft flying at lower altitudes at these locations if the minimum altitudes are lowered by 1000 ft. The FAA

can avoid this potential noise issue altogether by not lowering the altitude requirements for any procedures.

### *Concentration of Flights*

The new flight procedures using satellite-based navigational technology are more precise and tend to create a narrower flight path, resulting in a concentration of flights over certain areas such as the CLIFY waypoint and the TRNDO waypoint with the proposed RNP procedures for aircraft arriving to LAX. Besides these two navigational points, there are many other RNAV/RNP procedures proposed for other areas that will also result in the concentration of flights. As such, people who reside in areas under the condensed flight paths will experience more noise while those that are outside the flight paths will experience less noise. As a possible noise reduction measure for this issue, the Roundtable suggests that the FAA explore routing aircraft over commercial and industrial areas instead of residential areas where possible to decrease the concentration of flights over residential communities.

These are just some of the proposed changes that we wanted to point out to illustrate the potential noise implications that the SoCal Metroplex Project may have on residential communities. Many other proposed procedures may also change flight paths and noise exposure and potentially affect the residential areas. The Roundtable understands that the airspace in Southern California is congested and complex and that the process of optimizing the airspace to improve efficiency and safety will require some modifications to flight paths and result in noise exposure changes. While shifting of noise from one location to another may be unavoidable in some cases, it should be minimized where possible.

### Making Adjustments to Procedures after Implementation

Many people will only notice changes in flight activity and noise after the implementation of the Metroplex project. Therefore, the FAA may want to consider the possibility of making adjustments to the procedures after implementation should they result in widespread community complaints. The Roundtable would like to work in collaboration with the FAA to identify areas of concern and to develop possible alternative solutions that decrease noise exposure. The Roundtable has successfully worked with the FAA in the past to develop noise abatement procedures that proved to be effective, and is committed to continue doing so. The FAA's willingness to make refinements to procedures after implementation and to work with the communities to identify and resolve noise issues will help achieve a higher level of success for the Metroplex project.

### Roundtable's September 24, 2012 Recommendations

During the review of the proposed procedures, the Roundtable also examined the extent to which the noise abatement recommendations in its September 24, 2012 letter to the FAA were incorporated into the Metroplex project. The Roundtable identified only one of the proposed

procedures that may partially address the recommendations. The proposed North Downwind RNP arrival procedure may partially reduce overflights for Monterey Park with the understanding that controllers will still have the option to vector aircraft further to the east for safety and traffic considerations. The North Downwind RNP also has potential to reduce short turn operations and decrease overflights for communities that are closer to LAX such as View Park-Windsor Hills and Ladera Heights, since the RNP arrival procedure will direct aircraft to turn to base leg at a location over primarily commercial areas between the 110 and 710 freeways. The Roundtable supports this proposed procedure as it has the possibility to minimize both short turns and extended downwind approaches, thereby reducing overflights over residential areas.

The Roundtable did not identify any other proposed procedures that address the remaining recommendation measures. For that reason, the Roundtable requests that an FAA representative familiar with the development of the Metroplex project attend a future Roundtable meeting in 2015 to explain how and why the Roundtable's recommended noise abatement measures were or were not considered in the Metroplex process.

#### De-confliction of SMO and LAX Departures

The Roundtable recognizes that the Metroplex project will address the departure delay issues at LAX and SMO. Due to the proximity of the two airports, aircraft departing to the west from SMO and LAX are on converging headings and require air traffic controllers' coordination and sequencing of aircraft to ensure they meet required safety and separation standards. These necessary coordination efforts lead to departure delays at SMO and LAX. The Roundtable supports the proposed changes to SMO departure procedures that will de-conflict the two departures streams and reduce delays at both airports. The proposed changes may also enable LAX FAA air traffic control tower personnel to better balance the number of departures between the north and south airfield complexes, which in turn will result in a better balance of departure noise exposure for the communities to the north and south of LAX.

#### Noise Metrics

The Roundtable understands that the FAA conducted the noise analysis under the requirements of the National Environmental Policy Act and that the Day-Night Average Sound Level (DNL) is the federally-required metric for assessing aircraft noise impacts. In California, most agencies use the Community Noise Equivalent Level (CNEL) to assess aircraft noise impacts. The CNEL metric is very familiar to the Roundtable and the communities it represents.

CNEL includes an evening weighting that treats each aircraft operation between 7 pm and 10 pm as though it were three, adding approximately 4.77 dB to every evening operation. Given that approximately 20 percent of the flights at LAX occur during the evening period, the Roundtable believes that using CNEL may reveal some increases in aircraft noise exposure that exceed the thresholds of significance. Since the FAA acknowledges and accepts CNEL for EAs

conducted for airport improvement projects in California, the Roundtable requests that the FAA conduct noise analysis using CNEL and share the results with the public.

In addition to cumulative noise metrics such as DNL and CNEL, the Metroplex EA should present information in terms of single event metrics such as the Maximum Sound Level, the Sound Exposure Level, or the Number of Events Above of particular sound level (e.g., NA70). In particular, for noise sensitive land uses that will be experiencing entirely new, lower, or concentrated flight activity, we request that the FAA provide a comparison of the change in single event levels and the change in the number of events for the noise sensitive land uses under those flight paths. By providing this information in the EA, the public will be able to assess whether the new and/or concentrated overflights will interfere with their speech and/or sleep.

#### Information provided in the Draft EA

We understand that the FAA did not knowingly include any proposed procedures as part of the SoCal Metroplex Project that could have substantial impact that would require the preparation of a full Environmental Impact Statement in accordance with the National Environmental Policy Act. Alternatively, the FAA prepared an EA to document the potential environmental effects associated with the proposed procedures. The Draft EA provides insufficient information for community members to assess potential adverse noise impacts on their specific community caused by the proposed changes. The proposed procedures shown in the Draft EA do not include specific information such as altitudes, waypoint coordinates, the estimated number of flights for each proposed route, and the adoption rates for RNP/RNAV procedures.

The FAA partially addressed this issue subsequent to the EA release by providing some graphics showing flight procedures on Google Maps. More recently, the FAA provided additional details on flight procedures with waypoints, altitudes and other information for residents to review separately while using the Google Earth application. The information presented in Google Earth allows residents to see existing procedures along with the proposed procedures to get an idea of flight path changes.

The Roundtable appreciates the FAA providing additional information for the Metroplex Project. This supplemental information helps communities better understand the Metroplex's proposed changes, but not fully quantify them. The routes depicted to approximate flight paths are of insufficient detail on these maps to allow specific assessment of impacts. Instead, these maps provide a general impression for areas and are not sufficient to verify assumptions.

The EA does not provide a listing of detailed assumptions such as temperature or weather conditions assumed or a range of variabilities. Changes to the volume of air traffic after 2021 or runway configuration at LAX are not a subject of this EA. Impacts from changing flight mix or future increases in volume of operations anticipated are also not addressed in the EA.

The Roundtable appreciates the opportunity to express its views on this matter and recognizes the FAA's efforts to improve efficiency and safety as part of the SoCal Metroplex Project. While we understand the intent of the project is to enable aircraft to fly more efficient, direct routes and enhance safety through improved predictability and repeatability of procedures as well as reduce pilot and ATC workload, we are concerned that the project may potentially have noise implications for the residential communities as stated in this letter. Although the Roundtable was not involved in initial assessments of any range of changes prior to the EA release, we appreciate the current openness of the FAA to address our questions and to work with us. The FAA's support over the years of our efforts to reduce aircraft noise impacts on the communities surrounding LAX is again appreciated and we look forward to future opportunities to continue working with the FAA to minimize noise exposure.

The position stated in this letter is the opinion of the majority of the Roundtable membership and does not represent the official position of the FAA, the City of Los Angeles, or LAWA.

Sincerely,

A handwritten signature in black ink, appearing to read "Denny Schneider", with a long horizontal flourish extending to the right.

Denny Schneider, Chairman  
LAX/Community Noise Roundtable