



# LAX Community Noise Roundtable

Clifton A. Moore Administration Building • 1 World Way • Los Angeles, CA 90045

Web: <http://www.lawa.org/LAXNoiseRoundTable.aspx>

Date: September 23, 2017

Michael P. Huerta, Administrator  
Federal Aviation Administration  
800 Independence Ave. SW  
Washington, DC 20591

**SUBJECT: Working Together to Try to Make NextGen Livable**

Dear Administrator Huerta:

It was good being with you at the Ontario Airport transfer ceremony and seeing how you can make things happen.

It will not surprise you to learn that the LAX Community Noise Roundtable (LAX RT) and elected officials (local and Federal) have been inundated with complaints about massive increases in aggravating noise during the day and sleep disrupting noise at night. This is a direct result of the Metroplex's relocated and densely concentrated flight paths.

We want to open a new dialogue with you and new process with the FAA that will – we hope – lead the FAA to alleviate the worst environmental impacts of the Metroplex and make NextGen livable for the residents of the Los Angeles region.

This cover letter introduces a packet of three comment letters on pending IFP procedures for LAX and an appendix of data and documents that provide evidence of disruptive noise problems and procedural irregularities.

## **The LAX Noise Roundtable and Environmental Impacts from NextGen Noise:**

The Southern California region skies are one of the nation's busiest airspaces and LAX is, by far, the busiest airport in the region. The new RNAV procedures approved and implemented in spring 2017 in the SoCal Metroplex have newly impacted multiple communities that did not have noise problems before NextGen. Several of these communities are reeling from unbearable conditions on the ground.

The LAX Noise Roundtable is comprised of elected officials, representatives of recognized community groups, FAA, airlines, and executives from LAWA. We represent the public and a wide array of stakeholders in the Los

# LAX Community Noise Roundtable



Angeles region whose objective is to minimize noise impacts on millions of residents while always recognizing the imperative of air traffic safety. We seek to improve FAA stakeholder engagement and to help resolve specific SoCal Metroplex implementation concerns, as well as other noise issues predating SoCal Metroplex implementation.

We support the FAA's initiative to move the airline industry from 20<sup>th</sup> century ground-based communications technology to 21<sup>st</sup> century satellite-based technology. But the actual implementation of the SoCal Metroplex has, unfortunately, substantiated concerns about 1) the relocation of flight paths to areas that previously had few flights overhead and 2) the unprecedented concentration of air traffic in narrow paths that extend for many miles away from the airports (in contrast to the old dispersed flight patterns up until the final approach or immediate departure paths).

LAX operates 24/7. Unlike smaller airports, flights continue during the hours of 10PM to 7AM, the hours during which FAA noise metrics and formulas recognize the extreme power and negative environmental impact of airplane noise. As bad as the new noise problems are during the day, they are devastating at night.

## **Many NextGen Problems are Common Across Regions and were predictable.**

This is a national phenomenon. In seemingly every NextGen implementation there have been swaths of communities stretching on for as much as 30 or 40 miles of approach/departure paths into and out of airports that have been afflicted by unprecedented noise disturbances due to intensely concentrated and relocated flight paths. The specifics vary by local geography, details of air traffic, and hours of operation, among other variables, but the pattern is widely shared.

The problems we are experiencing around LAX are shared at other locations in the SoCal Metroplex, and it was all too easily predictable. In fact, the LAX RT anticipated some of these problems and so asked the FAA in 2015 and 2016 for possible changes to alleviate their worst impacts. We and the communities we represent believe that the FAA must quickly do more to alleviate noise impacts.

One of the problems that has beset the roll out of NextGen at many locations around the country has been a breakdown in FAA communication with the public and their elected representatives. Since implementation in Los Angeles, we have grappled with the problem of the FAA not sharing significant and necessary information, not engaging in real dialogue, not performing implementation and operations as they were presented for review and approval, and sometimes not operating by the FAA's own rules and procedures.

## **Communications Problems and Deviations from Rules and Procedures Hurt the Public and Make the LAX RT's Responsibilities Difficult to Fulfill, Which Cannot be Good for the FAA:**

Unfortunately, the LAX RT and the communities we represent are experiencing communication problems with the FAA, as well as troubling episodes of the FAA not following, upholding, and implementing its own rules.

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We are concerned about the diminishment of well-being and quality of life experienced by tens of thousands of residents living under the relocated and concentrated flight paths.

We are also concerned about the strain that the FAA has put on the LAX RT by, frankly, not abiding by the FAA's own rules in Instrument Flight Procedure (IFP) design, IFP approval, and provision of public record information necessary for informed comment. The failure of Air Traffic Control to observe critical Minimum Altitude restrictions in published flight procedures is another critical deficiency. Indeed, altitude restrictions were a critical element of Metroplex plans that were given environmental clearance, since altitude is one of the most the dominant variables determining noise on the ground.

Given the painful environmental impacts being suffered by so many residents, these breakdowns in communications and failure to abide by rules and procedures have further intensified public skepticism about the FAA and fueled distrust. As the institutional conduit between the public and the FAA, this puts the LAX RT in a position of great stress, and it challenges our ability to fulfill our obligations.

## **Lessons from Past Experiences of LAX RT & FAA Successes and Failures**

The LAX RT appreciates, values, and publicly defends the FAA's superior safety record. We take pains to explain to the public that safety is the FAA's top statutory priority. We are also proud of our 20 year track record of working in partnership with LAWA and the FAA to solve noise and various other problems related to air traffic at one of the world's busiest airports.

FAA representatives regularly attend LAX RT meetings. In recent months, FAA Regional Administrator Dennis Roberts has attended most of our meetings. We want you to know we appreciate that.

In the past, representatives from TRACON attended about half of our meetings, but it has been about a year since staff from TRACON have attended a meeting of the LAX RT. Staff from the tower at LAX attend with regularity.

LAWA is an intermediary with the FAA. While the RT typically sends requests for changes directly to the FAA, response typically come back via LAWA. Our requests for data typically go to LAWA, which obtains data from the FAA and then conveys it back to us.

New circumstances of NextGen require that we have more direct exchanges with the FAA on a range of issues, while also maintaining exchanges with and through LAWA. For the moment, we just want to emphasize the series of mediated relationships through which we have operated up until now: The LAX RT is an intermediary with the FAA for the public and local governments, and the RT's communications with the FAA often pass through LAWA as an intermediary.

That is a complex arrangement. It has enjoyed some successes in the past, and also some frustrating failures.

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One success concerned the FAA's development in the mid-2000s of an extended loop path for daytime departures that takes the aircraft farther out over the ocean to facilitate adequate climbing and then allows them to return east by crossing over LAX at a minimum of 10K-12K feet. Around 2000 the LAX RT began receiving increasing numbers of complaints about aircraft taking off to the west and circling back over the coastline of numerous South Bay cities at very low altitudes (3,000 to 5,000 feet). The LAX RT worked on this problem with help from LAWA, and after a few years the FAA developed the extended loop path so that increased altitudes on the return path were achieved and the aircraft went directly over LAX rather than over the coastline communities and substantially alleviated the noise problem. The FAA followed up in 2014 with testing to extend the hours of use of this procedure. We regard this as a success that shows how the LAX RT and the FAA can work together to improve environmental conditions for many thousands of people living under LAX's busy flight paths.

One episode of frustrating failure concerned the LAX RT's and LAWA's request to the FAA, circa 2007, for a tightening up of the granting of exceptions for pilots to take-off Eastbound (over land) during nighttime hours when Westbound take-offs (over ocean procedures) are typically in force to control severely disruptive nighttime noise. The LAX RT responded to an increasing number of noise complaints and LAWA joined with us in working on the problem. LAWA spent years petitioning the FAA for modest change to the Part 161 rules to alleviate the problem. For eight years the FAA asked LAWA for more and more detailed data and explanations, which LAWA provided at great expenses of time and money. Then the FAA finally deemed the formal application "complete," only to promptly reject the request in 2014.

In 2014, when the FAA rejected the LAWA request for a modest change to Part 161 rules to alleviate take-off noise at night, the FAA was also putting the SoCal Metroplex development process into high gear.

Our partnership with the FAA to alleviate take-off noise in the mid-2000s by using an extended loop path over the ocean is an example that we remember as an indicator of how we can succeed through cooperation. On the other hand, the memory of how our reasonable request for a modest change in Part 161 rules to reduce nighttime overland takeoffs was dragged out for eight years only to be dismissed gives us as pause, today, as we confront an unprecedented set of challenges with the implementation of NextGen.

We have never before received so many noise complaints from over such an extended geography. The complexity of the Metroplex means that our own task is now vastly more complex. In the past our main efforts concerned the immediate take-off and landing paths near the airport, but now we find we must attend to IFP waypoints stretching out on 30 to 40 mile flight paths because we are being flooded with public and elected official complaints from those extensive pathways.

The task we have before us requires us to have more knowledge, more data, and consequently more frequent and more substantive interaction with the FAA.

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But at the very moment when demands on the LAX RT to be a viable intermediary with the FAA are being increased – not just by the public, but also by the FAA, which asks that all concerns and request for changes be funneled through the RT – we are finding that FAA is not being the partner we all need it to be.

In what follows, we will delineate several specific issues on which we have those needs. These are issues that are of great concern to the public and elected officials because the public is suffering from intolerable levels of unprecedented noise – new in both geography and intensity.

## **Specific Problems the LAX RT and FAA Need to Rectify as Soon as Possible**

- 1. Urgent need to meet or exceed the Mandatory Minimum Altitude of 6,000 feet at DAHJR on the STAR HUULL, IRNMN, and RYDDR IFPs – especially during night operations.**
  - a. Since the April 27, 2017 implementation of these IFPs, an inexcusable 67% of aircraft crossing Waypoint DAHJR have failed to meet DAHJR's Mandatory Min Alt of 6,000 feet.
  - b. DAHJR is in the middle of an approximately 15 mile stretch of approach route that stretches from the Santa Monica coast to Downtown Los Angeles before turning back Westward for the final approach into LAX. Below Min Alt flights inflict severe noise problems on tens of thousands of people in the densely populated urban communities under this newly concentrated and relocated flight path.
  - c. FAA ATC are assigning these low altitudes. Many flights come in 1,000 feet, 2,000 feet, even 3,000 feet below the Min Alt at DAHJR, including during late night and early morning hours that have the most severe impact of flight noise.
  - d. The few planes that are not RNAV equipped do not explain the failure rate, nor do exigent circumstances of traffic, spacing and sequencing.
  - e. There is absolutely no excuse for planes missing the Min Alt at night (10PM -7AM) when light traffic eliminates virtually all spacing and sequencing problems.
  - f. This must be rectified ASAP. We believe it can and should be done within the next months.
  - g. The LAX RT and our constituent communities and elected officials regard the correction of this problem as a test case that will show us that we can work cooperatively with the FAA to make NextGen livable.
  - h. Similar problems of failing to meet Min Alt restrictions prescribed in IFPs exist elsewhere in our region, and those shortfalls need to be rectified, too.
- 2. Proposed revisions now at flight check for STAR HUULL 2, IRNMN 2, and RYDRR 2 include a new Mandatory Min Alt restriction of 6,000 feet at Waypoint GADDO. We request that this be approved promptly and that ATC ensures that all planes except those with truly exigent circumstances meet the new restriction. (please see our comment letter for further detail)**
  - a. Like DAHJR, the altitude at GADDO determines the degree of noise inflicted on many thousands of people East and West of the waypoint.
  - b. In July 2017, 97% of aircraft at GADDO were below 6,000 feet at GADDO, and many were far below 6,000.

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- c. Min Alt restrictions help large projects like the Metroplex clear environmental review, but if they are not observed in practice then there severe problems of credibility and trust along with the obvious noise problems.
  - d. Because these revised IFPs are close to publication we do not want to hold them up. We want the altitude restriction implemented and achieved at GADDO as soon as possible.
  - e. For future revisions of these STAR IFPs, we urge the FAA to make an increase in the Min Alt assigned to DAHJR. We believe an increase of 500 to 1,000 is almost surely feasible based on flight data observed. We also recommend that the Min Alt at DHAJR be changed from Mandatory "At X,000 feet" to "At or Above X,000 feet."
- 3. Respond to our questions about STAR BAYST 1 and STAR SADDE 8 (see our comment letters) and take prompt remedial actions should this information indicate a need for a significant modification of the procedure.**
- a. We needed to know more about these procedures to comment on them adequately, but the FAA refused to brief us on the procedures.
  - b. The documents available on the IFP Information Gateway do not provide sufficient information about when these procedures will be used, nor about the apparent intent for BAYST to be used only by cargo aircraft.
  - c. We have altitude restriction questions about both proposed procedures, which is of obvious concern from a noise standpoint.
- 4. The problem of the FAA sharing information with us mentioned in the case of STAR BAYST 1 and STAR SADDE 8 also included STAR HUULL 2, IRNMN 2, and RYDRR2 – all of which were sent to flight check in late August and opened for public comment until September 25 and September 26 in the case of SADDE 8.**
- a. The FAA refused to brief us on these procedures, refused to discuss them, and refused to answer earlier inquiries about them.
  - b. Claims of "confidentiality" and "advice of counsel" were given, as well as silence.
  - c. The IFP proposals are public record information.
  - d. The comment period is required by law and FAA rules, and the same law and FAA rules require that the FAA provide adequate information so as to enable substantial comments.
  - e. Ex parte communication of such information is specifically enjoined by FAA JO JO 7400.2L para 2.1.3 : "This policy allows for appropriate ex parte contacts when necessary to ensure adequate public comment. Persons directly responsible for the rulemaking/nonrulemaking action should, in addition to providing the public the opportunity to respond in writing to proposed actions and/or to appear and be heard at a hearing, undertake such contacts with the public as will be helpful in resolving questions of substance and justification."



- f. We were effectively deprived of our right to make comments on BAYST1 and SADDE 8 because we were denied our request for information necessary for us to evaluate the proposed procedures.
- 5. Our concern about the FAA’s refusal to brief us on proposed IFPs is compounded by the example of an FAA briefing to industry that was found by one of our members. Not only did this briefing share information with industry that the FAA did not and would not share with us, but it also appears to have violated confidentiality required by the D.C. Circuit Federal Court of Appeals’ mandatory mediation program. We request the same information shared with industry in the teleconference and web-based conference discussions referenced in the slide show, which could be fulfilled by sharing recordings or transcripts.**
- a. On April 27, the FAA released to industry a slide show briefing on the imminent implementation of the SoCal Metroplex – see copy in the appendix accompanying this letter, esp slides 2, 4, 10, 11, and 30.
  - b. The slide show accompanied 4 days of teleconference and web-based briefings that appear to have included question and answer sessions.
  - c. In the slide show, the FAA informed industry that settlement proposals had been received from the Culver City plaintiff; that the proposal involved STAR HUULL, IRNMN, and RYDRR; that the FAA design team had completed a review of the proposals and was preparing a report for the legal department; and all of this was, apparently, opened to discussion by the industry participants in the teleconference and web conference briefings.
  - d. The National Business Aviation Association (NBAA) posted the slide show online, facilitating our access to it.
  - e. Claims by the FAA that our inquiries about proposed IFP revisions listed on the IFP Information Gateway could not be answered because of the Culver City lawsuit do not hold up to scrutiny. The public records of proposed IFP changes on the IFP Information Gateway have no connection to the Culver City lawsuit. BAYST and SADDE are obviously unrelated, and the changes proposed to HUULL, IRNMN and RYDDR are also unrelated to the lawsuit, as we will explain next.
- 6. The FAA’s proposed changes in STAR HUULL, IRNMN and RYDRR reveal another example of the FAA not abiding by its own rules to the detriment of residents in our region. The specific solution in this case is to implement HUULL 2, IRNMN 2, and RYDRR 2 as soon as possible, but this is another example of a broader need to tighten up adherence to rules.**
- a. The FAA Flight Standards Service reports for the subject IFP revisions state that the “Reason” for the FAA’s “Change” to assign a Mandatory Min Alt at GADDO is that a Min Alt is “REQUIRED PER FAAO 8260.3C PARA 2-2-1f(6)(b).”



- b. This rule has been effective since at least March 14, 2016 – more than one year before the April 27, 2017 publication of version 1 of these three IFPs. The rule requires that a terminal fix must have a Min Alt.
- c. While we absolutely support the assignment of a Mandatory Min Alt at GADDO, we are disturbed that this limit was absent since inception on April 27, 2017. Many thousands of residents have suffered from this error.
- d. GADDO is two waypoints East of Culver City. This would not directly alleviate noise in Culver City, and no other change in the procedures has even a remote connection to concerns about noise over Culver City.
- e. SADDE 8, which governs a conventional (not RNAV) procedure, also introduces a Min Alt at its terminal fix, Santa Monica SMO, for the same reason: it was required by a rule that was already in force before the publication of SADDE 7.

**Medium Term Changes to IFPs that Could be Implemented in Practice by ATC Relatively Soon (within approximately 6 to 12 months) and Simultaneously Developed in IFP Revisions (18-24 month standard process time)**

- 1) Commit to raising the Min Alt at critical waypoints like DAHJR, to the extent possible. Data indicates to us that at least a modest increase is possible. We know that the sky is not the limit because of the restriction of a maximum glide slope. But increases of 500 to 1,000 feet seem possible and would help alleviate noise.
- 2) Several waypoints with Mandatory Minimums (At X,000 feet) or ranges (between X,000 and Y,000 feet) could alleviate noise by changing to “At or above” restrictions.
- 3) We request that higher Min Alt restrictions be implemented during nighttime hours (10PM-7AM)
- 4) Needless to say, published altitude restrictions mean nothing if they are not achieved in practice by consistent observance on the part of ATC (with exceptions for exigent circumstances, of course).
- 5) The role of ATC in assigning altitudes that deviate from published restrictions means that the FAA could use ATC increase altitude levels above the already published restrictions – especially at critical waypoints for noise problems and especially at night.
- 6) Codifying new altitude restrictions in published IFPs will take 18-24 months, on top of however many months it might take until the FAA starts any such process.
- 7) We are well aware that longer term fixes to the NextGen noise problems will likely involve even longer time periods. In the SF Bay case, the SFO RT and the Select Committee spent about a year writing reports, the FAA is still in the process of responding to the reports one year later, and any changes involving IFPs are still at least two years out in the future. That is at least a four year





process, not counting the year or so before the FAA committed to responding to recommendations from the SFO RT and Select Committee. That makes it a five year process.

- 8) We want to do better.
- 9) We want the FAA to do better.
- 10) Consequently, we ask the FAA to please commit to working with us now by
  - a) Committing to respond to recommendations from the LAX RT
  - b) Beginning to make the medium term changes just outlined
  - c) And, as soon as possible, implement the urgent short term changes listed above, both to alleviate truly unbearable noise problems and also a measure to build confidence on the part of the public.

## **Proposals for Better Process in the Future**

- 1) Please be willing to share the same information with us that you share with industry.
- 2) Please work with us to define and deliver monthly data reports on flight dispersion and altitude compliance at IFP waypoints that are near or over land with restrictions of 10,000 feet or less. In addition to aggregate data, please break out data by daytime hours (7AM to 10PM) and nighttime hours (10PM to 7AM).
- 3) Please commit to providing us with early information when we request information or a briefing on proposed changes to IFPs that might impact our region.
- 4) Please commit to working with us to alleviate the negative environmental impacts of NextGen to the extent that they can be alleviated while also meeting statutory obligations of safety and reasonable objectives of efficiency.

## **In Conclusion**

We need the FAA to work collaboratively with us. We know that there is leadership and compassion in the FAA that can help us to address the many noise issues that have existed for decades prior to NextGen. Many new SoCal Metroplex issues now exist. It is our hope that the FAA will work with us in an accelerated way to address these issues. We need to find ways to make NextGen livable for the residents of our region.

We look forward to hearing from you and hope that can together create a process – and real results – that makes NextGen livable for the people of the Los Angeles region.

Sincerely,

Denny Schneider, Chair, LAX Community Noise Roundtable

# LAX Community Noise Roundtable



## Attachments:

- LAX RT Letter to M Huerta dtd 9-23-2017 “Comments on Proposed Revisions to Three STAR IFPs”
- LAX RT Letter to M Huerta dtd 9-23-2017 “Comments on Proposed Revisions to STAR SADDE 8”
- LAX RT Letter to M Huerta dtd 9-23-2017 “Comments on Proposed New IFP STAR BAYST”
- LAX RT Presentation dtd 9-20-2017 “Presentation on Five Proposed New/Revised FAA North Arrival...”
- FAA Presentation dtd 4-27-2017 “Optimization of Airspace and Procedures in the Metroplex Project Update”

## CC:

- U.S. Senator Diane Feinstein
- U.S. Senator Kamala Harris
- Congresswoman Karen Bass
- Congressman Ted Lieu
- Congresswoman Maxine Waters
- Congressman Jimmy Gomez
- Council President Herb Wesson, City of Los Angeles
- Councilman Mike Bonin, City of Los Angeles
- Councilman Marqueece Harris-Dawson
- Ms. Deborah Flint, Exec. Dir. Los Angeles World Airports
- Mr. Dennis Roberts, Regional Administrator, Federal Aviation Administration, Western-Pacific Region



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Date: September 23, 2017

Michael P. Huerta, Administrator  
Federal Aviation Administration  
800 Independence Ave. SW  
Washington, DC 20591

## **SUBJECT:**

**Comments on Proposed Revisions to the Three STAR IFPs that Compose the LAX North Arrival Downwind Leg**  
**STAR HUULL (RNAV) TWO LOS ANGELES CA KLAX**  
**STAR IRNMN (RNAV) TWO LOS ANGELES CA KLAX**  
**STAR RYDRR (RNAV) TWO LOS ANGELES CA KLAX**

Dear Administrator Huerta:

We are writing to you for the following reasons:

1. To send you a copy of technical comments on the subject IFP revisions, which we have also submitted via the FAA's Information Gateway system.
2. To identify problems in the implementation of the SoCal Metroplex at LAX related to the initial versions of these procedures.
3. And also to bring to your attention a breakdown in adherence to FAA rules concerning public record information and the public right to comment, which has complicated the relationship between the public and the FAA. This poses a special problem for the LAX Community Noise Roundtable (LAX RT) in our role as an intermediary between our region and the FAA.

### Technical Comments Submitted via the FAA Information Gateway

The three subject IFPs - HUULL, IRNMN, and RYDRR - compose the LAX North Arrival Downwind Leg. Our comments are on common features of all three proposed revisions to these IFPs and therefore our comments are combined into one letter. We have submitted these comments via the FAA Information Gateway, individually for each of the three subject IFPs, before the September 25, 2017 due date.

1. The LAX RT unanimously endorses the assignment of a Mandatory Minimum Altitude (Min Alt) of 6,000 feet at Waypoint GADDO in all three IFPs. This is a positive step toward alleviating intolerable noise imposed on many thousands of residents under these North Arrival flight paths. We urge prompt publication and implementation of these revised IFPs.
2. However, we still have several critical concerns about the design and implementation of these IFPs:

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- a. FAA Air Traffic Control (ATC) must ensure the newly assigned Mandatory Min Alt of 6,000 feet at GADDO is consistently realized by aircraft.
- b. Since the April 27, 2017 implementation of the first versions of these IFPs, an inexcusable 67% of aircraft crossing Waypoint DAHJR, which immediately precedes GADDO, have failed to meet DAHJR's Mandatory Min Alt of 6,000 feet. This must be rectified.
  - i. FAA ATC is assigning these low altitudes. Many flights come in 1,000 feet, 2,000 feet, and even 3,000 feet below the Min Alt at DAHJR, including during late night and early morning hours that have the most severe impact of flight noise. The few planes that are not RNAV equipped do not explain this, nor do exigent circumstances of traffic, spacing and sequencing. There is absolutely no excuse for planes missing the Min Alt at night (10PM - 7AM) when light traffic eliminates virtually all spacing and sequencing problems.
- c. The FAA Flight Standards Service reports for the subject IFP revisions state that the "Reason" for the FAA's "Change" to assign a Mandatory Min Alt at GADDO is that a Min Alt is "REQUIRED PER FAAO 8260.3C PARA 2-2-1f(6)(b)." This rule has been effective since at least March 14, 2016 - more than one year before the April 27, 2017 publication of version 1 of these three IFPs. The rule requires that a terminal fix must have a Min Alt. While we absolutely support the assignment of a Mandatory Min Alt at GADDO, we are disturbed that this limit was absent since inception on April 27, 2017. Many thousands of residents have suffered from this error.
- d. For future revisions of these STAR IFPs, we urge the FAA to make an increase in the Min Alt assigned to DAHJR. We believe an increase of 500 to 1,000 is almost surely feasible based on flight data observed. We also recommend that the Min Alt at DHAJR be changed from Mandatory "At X,000 feet" to "At or Above X,000 feet."
- e. Last, we are troubled by several problems in the FAA's communication with us and the public and elected Federal officials:
  - i. Since spring 2017, FAA officials have been meeting with us, with the region's elected Federal officials, and with the public to discuss the predictable noise problems resulting from NextGen implementation. The LAX RT anticipated these problems and so asked the FAA in 2015 and 2016 for possible changes. In none of these meetings since spring 2017 did FAA staff ever inform us that revisions of pertinent IFPs were underway, nor that these revisions would address altitude issues.
  - ii. When one of our RT members researched his way to finding the FAA Information Gateway in late July 2017 and learned that these three procedures were "under development," he wrote repeatedly to senior FAA officials to request information about the scope of changes under consideration, but never received a response to that question.



- iii. A deputy of Senator Feinstein was told by FAA staff in late July or early August that the proposed revisions were minor tweaks that did not and could not address altitude issues.
- iv. The LAX RT wanted the FAA to discuss the proposed IFPs at its regular meeting held on September 13, 2017. FAA staff refused to brief the LAX RT and failed to provide any information on the proposed procedures on the grounds that the matter was a subject of confidential mediation and that they had been advised by counsel not to discuss the procedures. This request was for a meeting two weeks after these IFPs had moved to the “Flight Check” stage with a “Comment” period open until September 25, 2017.
- v. The RT was forced to hold a special meeting at the last minute to discuss the proposed procedures using only information posted on the FAA Information Gateway.
- vi. We seek to work with the FAA as partners to make NextGen livable for our area residents. The FAA says it regards us as a partner and that it wants all public and local government concerns to be conveyed to the FAA through the LAX RT. But for this to succeed the FAA needs to follow its own rules on providing information during comment periods, follow its own rules to include essential things like Min Alt assignments in IFPs, and make sure that the FAA’s own ATC branch observes essential Min Alt requirements over sensitive and densely populated routes. Without that partnership from the FAA, how can we tell the public and local government officials that we can be their conduit to the FAA?
- vii. Last, the credibility of the FAA’s Environmental Assessment (EA) of the Metroplex depends on the FAA at least somewhat approximately abiding by the essential design that was reviewed in the EA. A 6,000 Min Alt waypoint over a densely populated City might look good in an EA. But if the FAA routinely allows many planes to inexcusably cross that waypoint at 5,000, 4,000, and even 3,000 feet, then credibility suffers along with the people living under the flight path.

## **The LAX Noise Roundtable and Environmental Impacts from NextGen Noise:**

The Southern California region skies are one of the nation’s busiest airspaces and LAX is, by far, the busiest airport in the region. The new RNAV procedures approved and implemented this past spring (2017) have newly impacted multiple communities that did not have noise problems before NextGen. Several of these communities are reeling from unbearable conditions on the ground.

The LAX Noise Roundtable is comprised of elected officials, representatives of recognized community groups, FAA, airlines, and executives from LAWA. We represent the public and a wide array of stakeholders in the Los Angeles region whose objective is to minimize noise impacts on millions of residents while always recognizing the imperative of air traffic safety. We seek to improve FAA stakeholder engagement and to help resolve specific

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SoCal Metroplex implementation concerns, as well as other noise issues predating SoCal Metroplex implementation.

We support the FAA's initiative to move the airline industry from 20<sup>th</sup> century ground-based communications technology to 21<sup>st</sup> century satellite-based technology. But the actual implementation of the SoCal Metroplex has, unfortunately, substantiated concerns about 1) the relocation of flight paths to areas that previously had few flights overhead and 2) the unprecedented concentration of air traffic in narrow paths that extend for many miles away from the airports (in contrast to the old dispersed flight patterns up until the final approach or immediate departure paths).

LAX operates 24/7. Unlike smaller airports, flights continue during the hours of 10PM to 7AM, the hours during which FAA noise metrics and formulas recognize the extreme power and negative environmental impact of airplane noise. As bad as the new noise problems are during the day, they are devastating at night.

## **In Conclusion**

We need the FAA to work collaboratively with us. We know that there is leadership and compassion in the FAA that can help us to address the many noise issues that have existed for decades prior to NextGen. Many new SoCal Metroplex issues now exist. It is our hope that the FAA will work with us in an accelerated way to address these issues. We need to find ways to make NextGen livable for the residents of our region.

We look forward to hearing from you and hope that can together create a process - and real results - that makes NextGen livable for the people of the Los Angeles region.

Sincerely,

Denny Schneider, Chair LAX Community Noise Roundtable

CC: U.S. Senator Diane Feinstein

U.S. Senator Kamala Harris

Congresswoman Karen Bass

Congressman Ted Lieu

Congresswoman Maxine Waters

Congressman Jimmy Gomez

Council President Herb Wesson, City of Los Angeles

Councilman Mike Bonin, City of Los Angeles

Councilman Marqueece Harris-Dawson

Ms. Deborah Flint, Exec. Dir. Los Angeles World Airports

Mr. Dennis Roberts, Regional Administrator, Federal Aviation Administration, Western-Pacific Region



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800 Independence Ave. SW  
Washington, DC 20591

**SUBJECT: Comments on Proposed Revisions to STAR SADDE EIGHT LOS ANGELES CA KLAX**

Dear Administrator Huerta:

We are writing to you for the following reasons:

1. To send you a copy of technical comments on the subject IFP revision of STAR SADDE 8, which we have also submitted via the FAA's Information Gateway system.
2. To identify problems in the implementation of the SoCal Metroplex at LAX related to the existing published version of these procedures.
3. And also to bring to your attention a breakdown in adherence to FAA rules concerning public record information and the public right to comment, which has complicated the relationship between the public and the FAA. This poses a special problem for the LAX Community Noise Roundtable (LAX RT) in our role as an intermediary between our region and the FAA.

## Technical Comments Submitted via the FAA Information Gateway

1. The LAX RT unanimously endorses the assignment of a Minimum Altitude (Min Alt) at Santa Monica SMO in the proposed STAR SADDE 8 IFP. This is a positive step toward alleviating intolerable noise imposed on many thousands of residents under these North Arrival flight paths.
  - a. However, we are concerned that a Min Alt At or Above 7,000 might not be high enough given that this is a conventional procedure with no additional Min Alt levels or prescribed pathways East of Santa Monica SMO.
  - b. We are concerned by the fact that FAA Air Traffic Control (ATC) has assigned altitudes below prescribed Min Alt levels to a majority of aircraft at points East of CLIFY on the RNAV IFPs of the North Arrivals route; consequently we are not confident that Min Alt levels will be achieved in SADDE 8.

# LAX Community Noise Roundtable



- c. Achieving Min Alt levels in SADDE 8 and other procedures, whether RNAV or conventional, is a priority issue that the FAA ATC must rectify.
2. We also have additional critical concerns about the design and implementation of this IFP, all of which we wanted the FAA to address at our September 13, 2017 regularly scheduled meeting of the LAX RT, but the FAA refused to brief us on these IFP's even though they were open for public comment. Our comments are based solely on basic information on the website. More info is necessary to produce totally informed comment.
    - a. Why is this conventional STAR being revised and continued, and not being replaced by RNAV IFPs?
    - b. How many aircraft are expected to be assigned to follow the SADDE 8 procedure? Approximate numbers, a percentage of North Arrival flights, and a sense of frequency would be helpful for us to know
    - c. Are there specific conditions under which SADDE 8 is going to be used, or more likely to be used?
    - d. Why has the course heading away from Santa Monica SMO been changed from 68 to 70 degrees? It would have been helpful to see that heading carried forward on a map.
    - e. What are the likely vector paths after SMO? What are the possible vector paths after SMO? What are the likely altitudes after SMO?
    - f. The FAA Flight Standards Service report for the subject IFP revision states that the "Reason" for the FAA's "Change" to assign a Min Alt at Santa Monica SMO is that "An altitude restriction is required by criteria at the STAR terminus." Like similar changes being made on HUULL 2, IRNMN 2, and RYDRR 2, it seems to us that this change is necessary to bring SADDE 7, the exiting IFP, into compliance with FAAO 8260.3C PARA 2-2-1f(6)(b).
      - i. This rule has been effective since at least March 14, 2016. STAR SADDE 7, with no Min Alt at Santa Monica SMO, was published on October 21, 2016, and thus was out of compliance at its inception.
      - ii. We note with interest that the FAA Flight Standards Service report for SADDE 8 is dated September 15, 2016. At that time, STAR HUULL 1, IRNMN 1, and RYDDRR 1 were all under development and six months away from their eventual publication on April 27, 2017 - but none of them were brought into compliance with FAAO 8260.3C PARA 2-2-1f(6)(b). As a result, many thousands of people have lived with lower flights overhead due to IFP non-compliance with the FAA's own rules for IFPs.



# LAX Community Noise Roundtable



iii. We find this all disconcerting and it heightens our concerns about likely vector paths and altitudes for SADDE 8, and the general problem of FAA ATC compliance with prescribed Min Alt levels in IFPs.

3. The LAX RT is asking these questions in our comment letter because our request to be briefed on this and four other proposed IFPs open for comment was rebuffed by the FAA. We are troubled by several problems in the FAA's communication with us and the public and elected Federal officials:

- a. Since spring 2017, FAA officials have been meeting with us, with the region's elected Federal officials, and with the public to discuss the predictable noise problems resulting from NextGen implementation. The LAX RT anticipated these problems and so asked the FAA in 2015 and 2016 for possible changes. In none of these meetings since spring 2017 did FAA staff ever inform us that revisions of pertinent IFPs were underway, nor Min Alt assignments were among the changes being reviewed.
- b. When one of our RT members researched his way to finding the FAA Information Gateway in late July 2017 and learned that several revised procedures for North Arrivals were "under development," he wrote repeatedly to senior FAA officials to request information about the scope of changes under consideration, but never received a response to that question.
- c. The LAX RT wanted the FAA to discuss the proposed IFPs at its regular meeting held on September 13, 2017. FAA staff refused to brief the LAX RT and failed to provide any information on the proposed procedures - including SADDE 8, which is an IFP of special concern because of its location on an already troubled path - on the grounds that the matter was a subject of confidential mediation and that they had been advised by counsel not to discuss the procedures. This request was for a meeting two weeks after these IFPs had moved to the "Flight Check" stage with a "Comment" period open until September 25, 2017.
- d. The RT was forced to hold a special meeting at the last minute to discuss the proposed procedures using only information posted on the FAA Information Gateway.
- e. We seek to work with the FAA as partners to make NextGen livable for our area residents. The FAA says it regards us as a partner and that it wants all public and local government concerns to be conveyed to the FAA through the LAX RT. But for this to succeed the FAA needs to follow its own rules on providing information during comment periods. Without that partnership from the FAA, how can we tell the public and local government officials that we can be their conduit to the FAA?

# LAX Community Noise Roundtable



## The LAX Noise Roundtable and Environmental Impacts from NextGen Noise:

The Southern California region skies are one of the nation's busiest airspaces and LAX is, by far, the busiest airport in the region. The new RNAV procedures approved and implemented this past spring (2017) have newly impacted multiple communities that did not have noise problems before NextGen. Several of these communities are reeling from unbearable conditions on the ground.

The LAX Noise Roundtable is comprised of elected officials, representatives of recognized community groups, FAA, airlines, and executives from LAWA. We represent the public and a wide array of stakeholders in the Los Angeles region whose objective is to minimize noise impacts on millions of residents while always recognizing the imperative of air traffic safety. We seek to improve FAA stakeholder engagement and to help resolve specific SoCal Metroplex implementation concerns, as well as other noise issues predating SoCal Metroplex implementation.

We support the FAA's initiative to move the airline industry from 20<sup>th</sup> century ground-based communications technology to 21<sup>st</sup> century satellite-based technology. But the actual implementation of the SoCal Metroplex has, unfortunately, substantiated concerns about 1) the relocation of flight paths to areas that previously had few flights overhead and 2) the unprecedented concentration of air traffic in narrow paths that extend for many miles away from the airports (in contrast to the old dispersed flight patterns up until the final approach or immediate departure paths).

LAX operates 24/7. Unlike smaller airports, flights continue during the hours of 10PM to 7AM, the hours during which FAA noise metrics and formulas recognize the extreme power and negative environmental impact of airplane noise. As bad as the new noise problems are during the day, they are devastating at night.

## In Conclusion

We need the FAA to work collaboratively with us. We know that there is leadership and compassion in the FAA that can help us to address the many noise issues that have existed for decades prior to NextGen. Many new SoCal Metroplex issues now exist. It is our hope that the FAA will work with us in an accelerated way to address these issues. We need to find ways to make NextGen livable for the residents of our region.

We look forward to hearing from you and hope that together we can create a process - and real results - that makes NextGen livable for the people of the Los Angeles region.

Sincerely,

Denny Schneider, Chair LAX Community Noise Roundtable

# LAX Community Noise Roundtable



CC: U.S. Senator Diane Feinstein

U.S. Senator Kamala Harris

Congresswoman Karen Bass

Congressman Ted Lieu

Congresswoman Maxine Waters

Congressman Jimmy Gomez

Council President Herb Wesson, City of Los Angeles

Councilman Mike Bonin, City of Los Angeles

Councilman Marqueece Harris-Dawson

Ms. Deborah Flint, Exec. Dir. Los Angeles World Airports

Mr. Dennis Roberts, Regional Administrator, Federal Aviation Administration, Western-Pacific Region





# LAX Community Noise Roundtable

Clifton A. Moore Administration Building • 1 World Way • Los Angeles, CA 90045  
Web: <http://www.lawa.org/LAXNoiseRoundTable.aspx>

Date: September 23, 2017

Michael P. Huerta, Administrator  
Federal Aviation Administration  
800 Independence Ave. SW  
Washington, DC 20591

## **SUBJECT:**

**Comments on Proposed New IFP STAR BAYST (RNAV) ONE LOS ANGELES CA KLAX**

Dear Administrator Huerta:

We are writing to you for the following reasons:

1. To send you a copy of technical comments on the subject proposed new IFP, BAYST 1, which we have also submitted via the FAA's Information Gateway system.
2. And also to bring to your attention a breakdown in adherence to FAA rules concerning public record information and the public right to comment, which has complicated the relationship between the public and the FAA. This poses a special problem for the LAX Community Noise Roundtable (LAX RT) in our role as an intermediary between our region and the FAA.

## **Technical Comments Submitted via the FAA Information Gateway**

1. We have several specific concerns about the design and implementation of the proposed new BAYST 1 IFP, all of which we wanted the FAA to address at our September 13, 2017 regularly scheduled meeting of the LAX RT, but the FAA refused to brief us on these IFP's during open for public comment. Our comments are based only on information available on the FAA website.
  - a. What is the purpose and expected use of BAYST 1?
    - i. LAWA staff said they believed it is meant only for cargo aircraft that might need to be diverted off of STAR LEENA or STAR DIRBY, but the documents on the FAA Information Gateway do not seem to indicate that and LAWA could not confirm it. Is it limited to use by cargo aircraft? What about passenger aircraft? Would they be diverted onto BAYST 1, too? And if not, what would they be diverted onto if not BAYST 1?
    - ii. LAWA staff said they believe the flight path proposed in BAYST 1 is a formalization (with changes) of a similar but unpublished route to land on the South Runway that has been flown conventionally (not RNAV) from time to time over the years. Is that correct? Why is

# LAX Community Noise Roundtable



the route being formalized now? The documents on the Information Gateway do not speak to this.

iii. LAWA staff said they believe the BAYST 1 procedure is likely to be used only under special circumstances, such as bad weather or traffic overloads, but could not confirm that. The documents on the Information Gateway do indicate that the procedure is “to be assigned by ATC,” but add nothing more. Under what circumstances will this procedure be used? And how often?

b. We also have a couple of concerns about Minimum Altitudes on the procedure. We regard these as important questions because this is a new IFP with a new flight path that was not, to the best of our knowledge, considered in the Metroplex Environmental Assessment. The Min Alt questions take on more importance if BAYST 1 is principally for cargo aircraft that are noisier than passenger aircraft, plus cargo flight are often arriving at the highly sensitive late night and early morning hours:

i. Did the FAA take elevations in the Ladera Heights and Baldwin Hills areas into account when considering potential environmental impact from this proposed IFP?

ii. The LAX RT was also struck by the long distance (8.6 NM) between Waypoints CLIFY and DWYER, and wanted to know how NextGen optimized descent is achieved when the Min Alt levels assigned over this long span decrease only from 7,000-8,000 at CLIFY to at 7,000 at DWYER.

iii. We do not want to suggest a decrease in the Min Alt at DWYER or points East. Instead, if anything, we would request an increase in the Min Alt at CLIFY and also an increase at DWYER precisely because that span passes over the elevated terrain of Ladera Heights and the Baldwin Hills.

2. The LAX RT is asking these questions in our comment letter because our request to be briefed on this and four other proposed IFPs open for comment was rebuffed by the FAA. We are troubled by several problems in the FAA’s communication with us and the public and elected Federal officials:

i. Since spring 2017, FAA officials have been meeting with us, with the region’s elected Federal officials, and with the public to discuss the predictable noise problems resulting from NextGen implementation. The LAX RT anticipated these problems and so asked the FAA in 2015 and 2016 for possible changes. In none of these meetings since spring 2017 did FAA staff ever inform us that revisions of pertinent IFPs were underway, nor that new IFPs with new flight paths (possibly for noisier cargo aircraft) were under preparation, too.

# LAX Community Noise Roundtable



- ii. When one of our RT members researched his way to finding the FAA Information Gateway in late July 2017 and learned that several revised procedures for North Arrivals were “under development,” he wrote repeatedly to senior FAA officials to request information about the scope of changes under consideration, but never received a response to that question.
- iii. The LAX RT wanted the FAA to discuss the proposed IFPs at its regular meeting held on September 13, 2017. FAA staff refused to brief the LAX RT and failed to provide any information on the proposed procedures - including BAYST 1, a brand new procedure - on the grounds that the matter was a subject of confidential mediation and that they had been advised by counsel not to discuss the procedures. This request was for a meeting two weeks after these IFPs had moved to the “Flight Check” stage with a “Comment” period open until September 25, 2017.
- iv. The RT was forced to hold a special meeting at the last minute to discuss the proposed procedures using only information posted on the FAA Information Gateway.
- v. We seek to work with the FAA as partners to make NextGen livable for our area residents. The FAA says it regards us as a partner and that it wants all public and local government concerns to be conveyed to the FAA through the LAX RT. But for this to succeed the FAA needs to follow its own rules on providing information during comment periods. Without that partnership from the FAA, how can we tell the public and local government officials that we can be their conduit to the FAA?

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# LAX Community Noise Roundtable



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## In Conclusion

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We look forward to hearing from you and hope that can together create a process - and real results - that makes NextGen livable for the people of the Los Angeles region.

Sincerely,

Denny Schneider, Chair, LAX Community Noise Roundtable

CC: U.S. Senator Diane Feinstein

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Councilman Marqueece Harris-Dawson

Ms. Deborah Flint, Exec. Dir. Los Angeles World Airports

Mr. Dennis Roberts, Regional Administrator, Federal Aviation Administration, Western-Pacific Region



# Presentation on Five Proposed New/Revised FAA North Arrival Flight Procedures for LAX.

All are at Flight Check  
Comment period open to 9/25 & 9/26

LAX Roundtable – Special Meeting – September 20, 2017

Prepared by Michael Salman, UNNC representative

I have classified the proposed procedures into three groups, with distinct issues in each group:

1 – Revisions: HUULL 2, IRNMN 2, RYDDR 2

2 – Revision: SADDE 8

3 – New Procedure: BAYST 1

Let's proceed as follows:

- look at each group
- compare new vs old procedures for the revisions
- discuss them group by group after this presentation
- we can then consider whether to take action on any or all of them

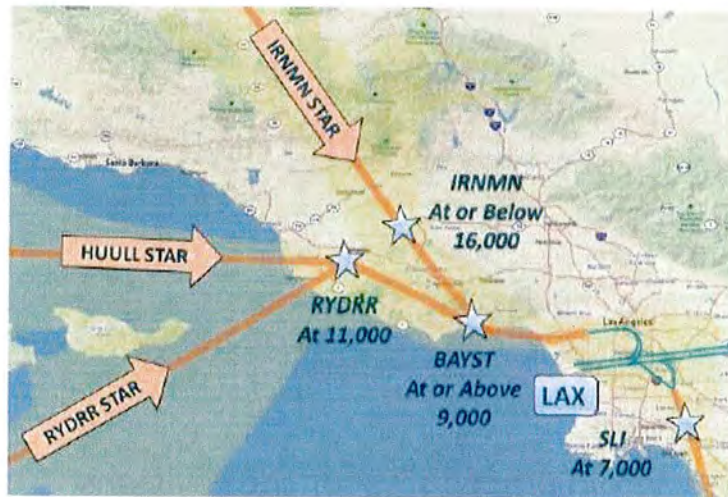
# GROUP #1

Revisions: HUULL 2, IRNMN 2,  
RYDDR 2

All are RNAV procedures

## IRNMN HUULL & RYDR STAR

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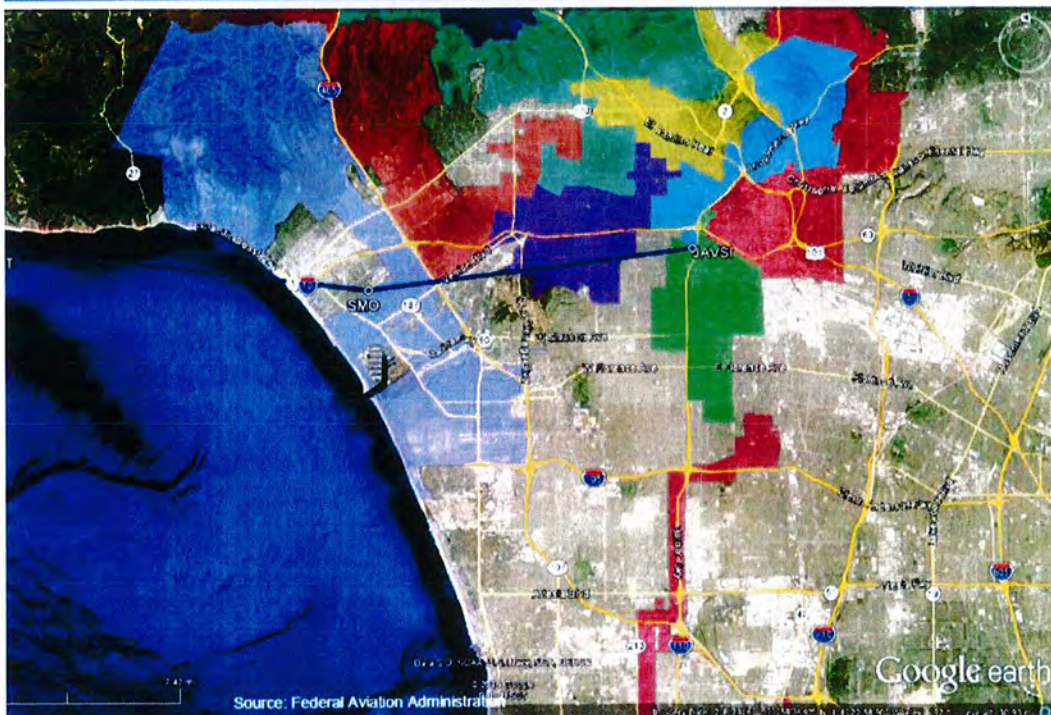




# Federal Aviation Administration (FAA) SoCal Metroplex Project LAWA Briefing to City Council IGTC&T Committee

Los Angeles World Airports  
Noise Management  
June 7, 2016

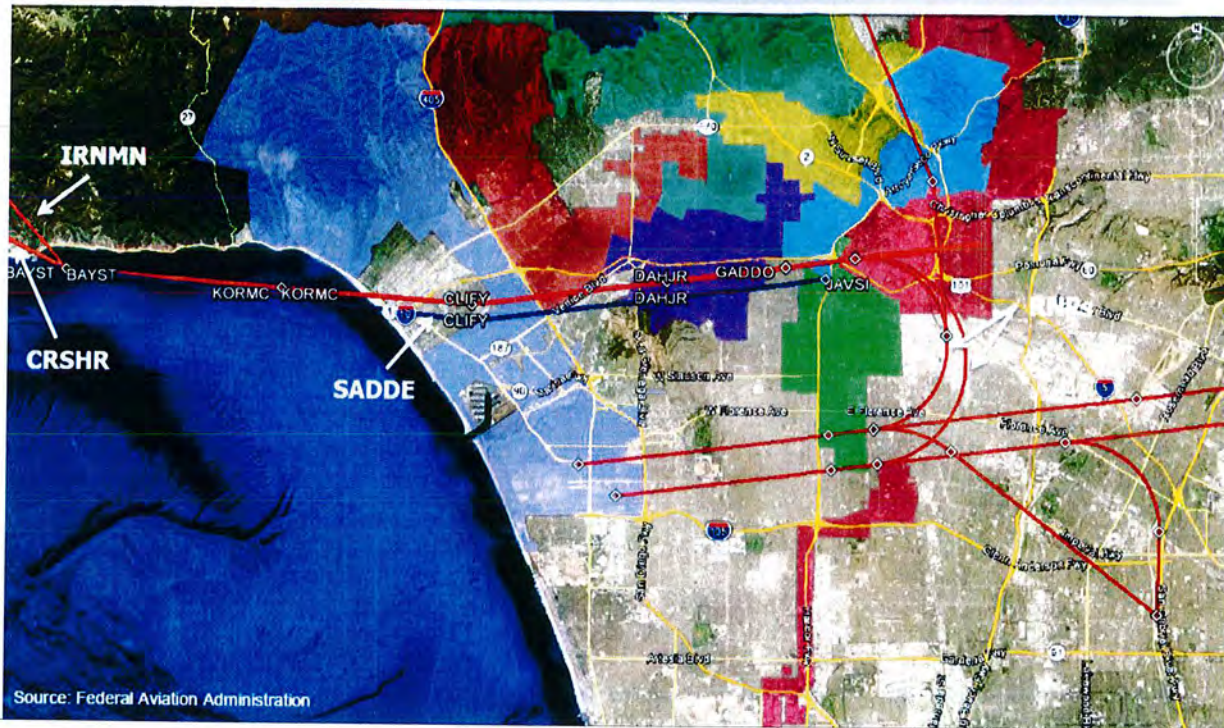
## LAX North Arrival Downwind Leg Current Procedure: SADDE 6





# LAX North Arrival Downwind Leg

## SADDE6 vs. Proposed CRSHR and IRNMN RNAVs and RNP

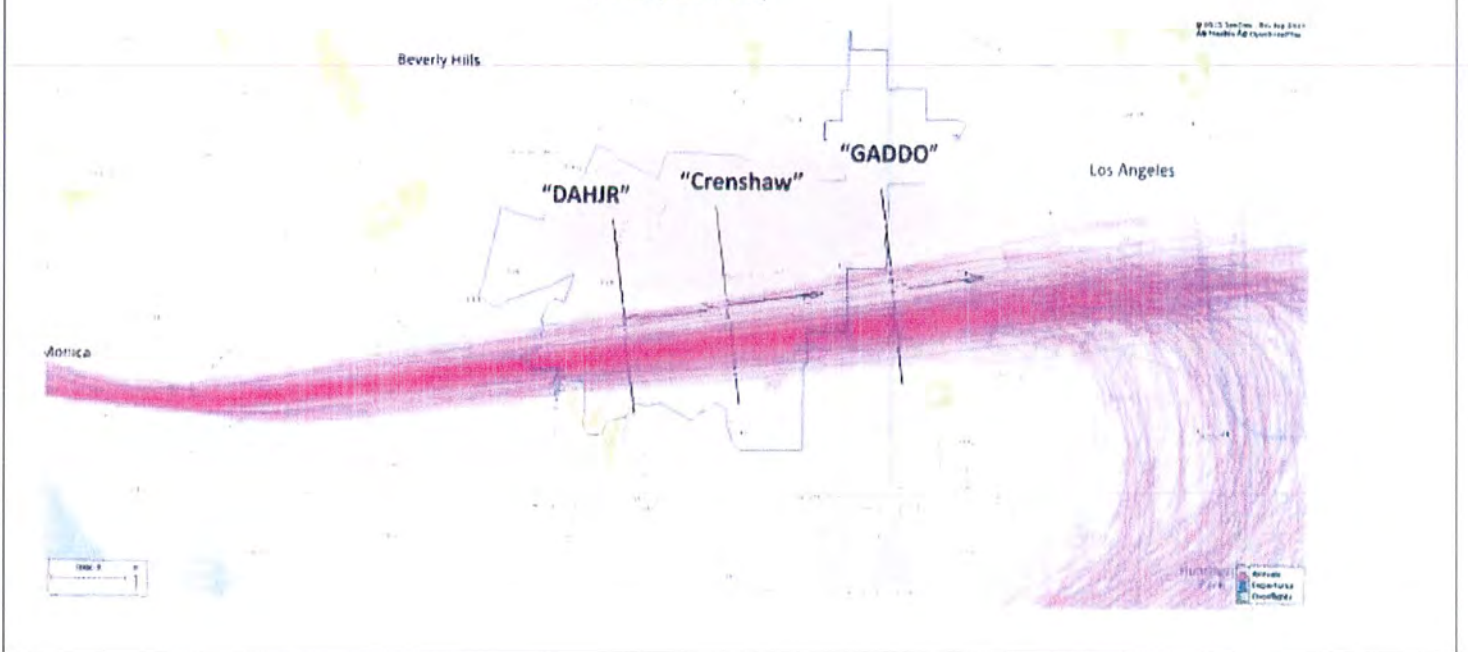


## Flight Tracks, Dispersion Graphs, & Altitude Data that LAWA Gave to Office of L.A. City Council President Herb Wesson

- 1) Comparing Pre vs Post NextGen = Apples vs Oranges
- 2) What Matters: Concentrated Flight Path, Over New Area, New Waypoints, New Min Alt, New Noise Impact, FAA Does Not Observe Own Rules

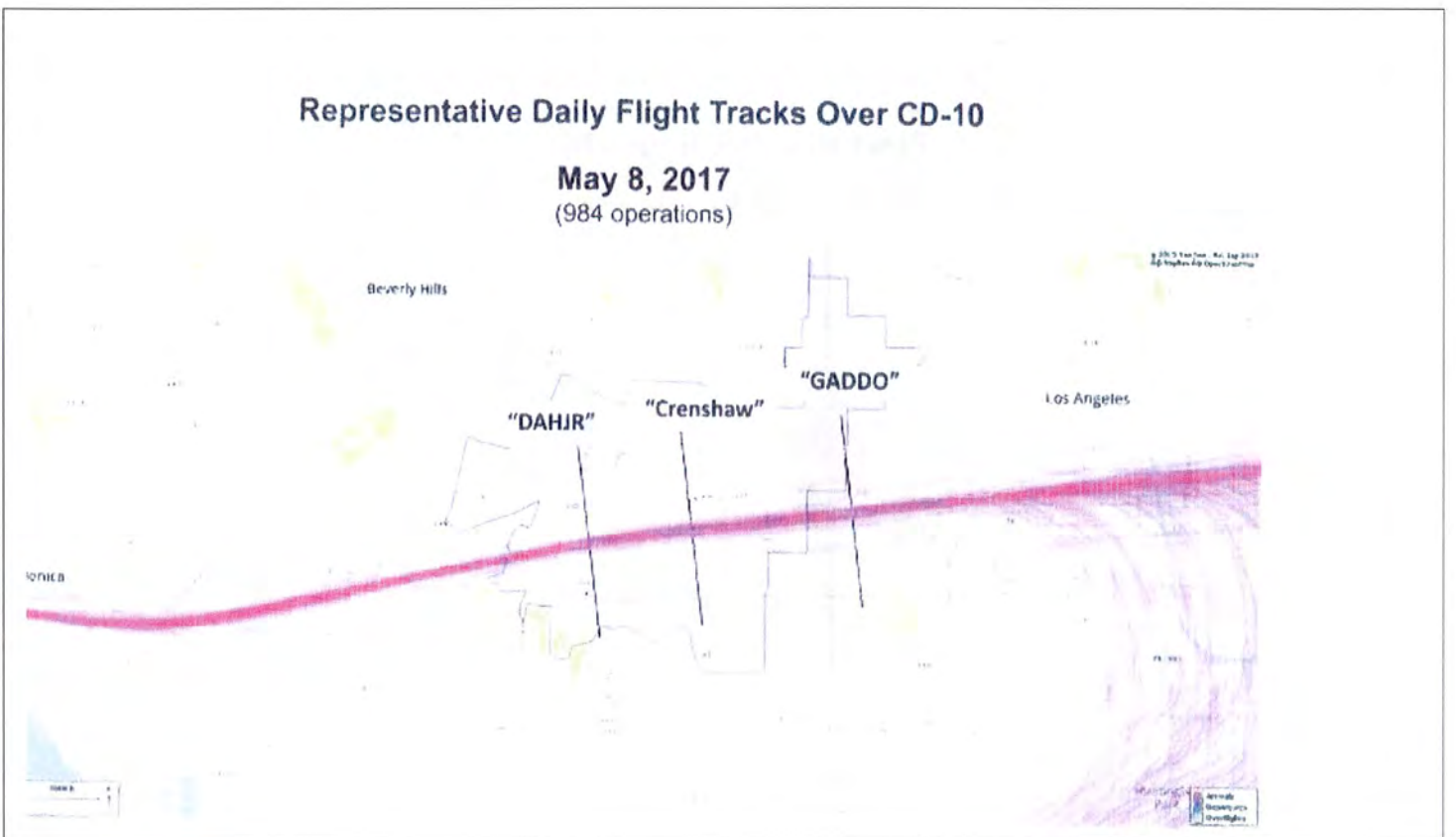
# Representative Daily Flight Tracks Over CD-10

November 7, 2016  
(922 operations)



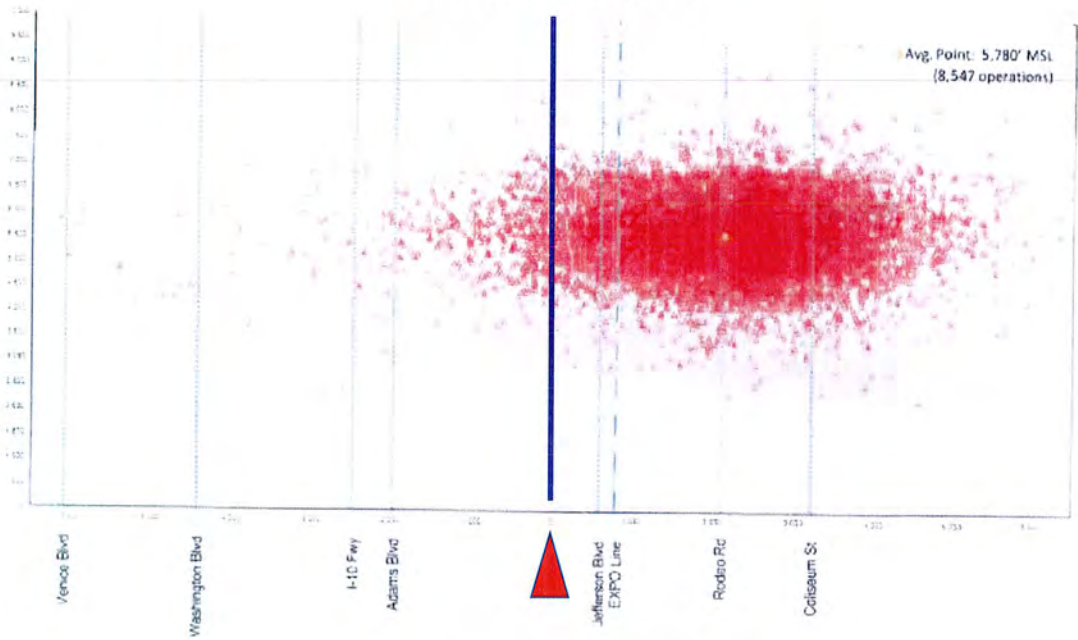
# Representative Daily Flight Tracks Over CD-10

May 8, 2017  
(984 operations)

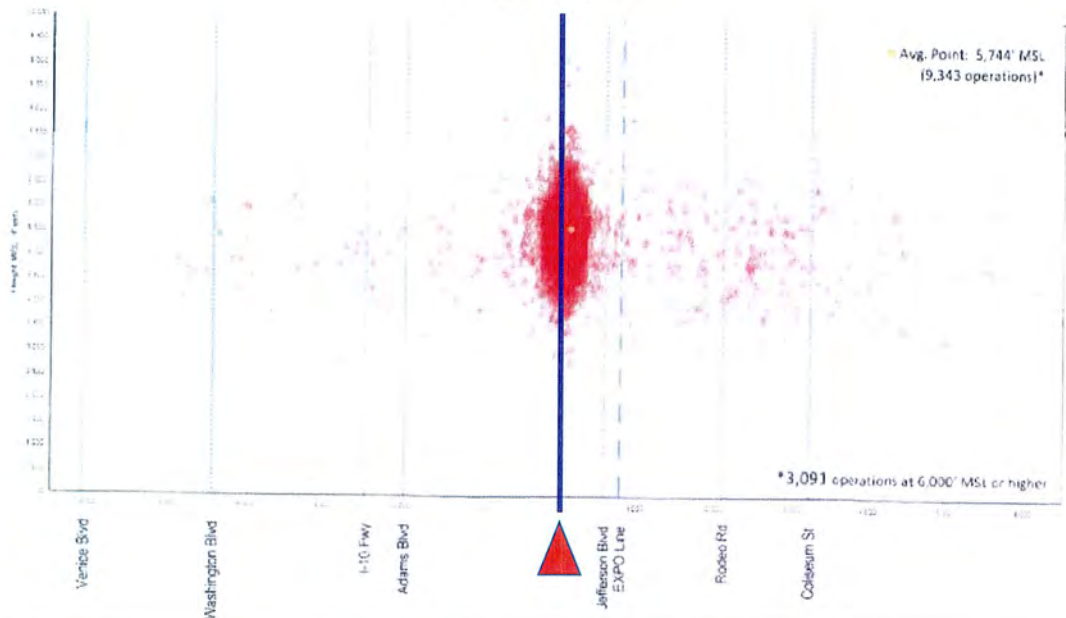




### Aircraft Gate Penetration Plot at "DAHJR" (Centered near S. Redondo Blvd and Blackwelder St) November 1-30, 2016

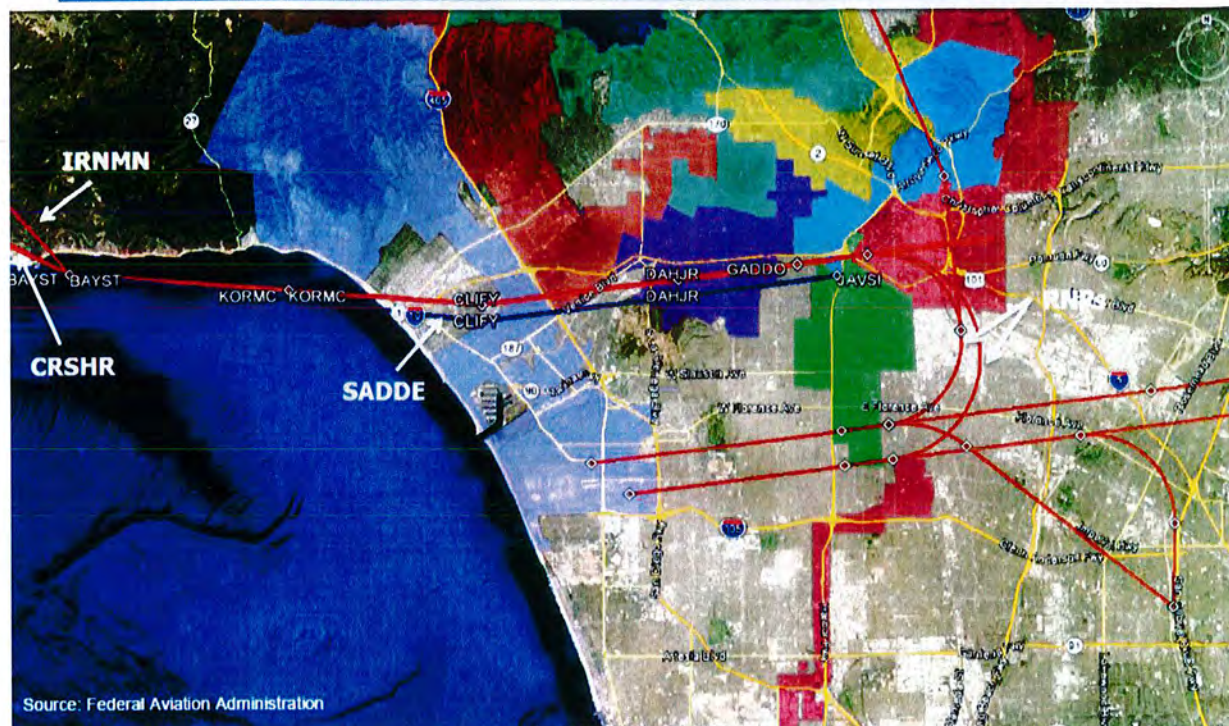


### Aircraft Gate Penetration Plot at "DAHJR" (Centered near S. Redondo Blvd and Blackwelder St) May 1-31, 2017



# LAX North Arrival Downwind Leg

## SADDE6 vs. Proposed CRSHR and IRNMN RNAVs and RNP



| Nov-2016          |              |          | Mar-2017     |                   |              |          |              |
|-------------------|--------------|----------|--------------|-------------------|--------------|----------|--------------|
| Altitude MSL (ft) | Count of Ops | % of Ops |              | Altitude MSL (ft) | Count of Ops | % of Ops |              |
| >9500             | 1            | 0.0%     |              | >9500             | 1            | 0.0%     |              |
| 9000-9500         | 2            | 0.0%     |              | 9000-9500         | 2            | 0.0%     |              |
| 8500-9000         | 4            | 0.0%     |              | 8500-9000         | 5            | 0.1%     |              |
| 8000-8500         | 14           | 0.2%     |              | 8000-8500         | 14           | 0.2%     |              |
| 7500-8000         | 54           | 0.6%     |              | 7500-8000         | 68           | 0.8%     |              |
| 7000-7500         | 367          | 4.3%     |              | 7000-7500         | 392          | 4.4%     |              |
| 6500-7000         | 1113         | 13.0%    |              | 6500-7000         | 1166         | 13.0%    |              |
| 6000-6500         | 1732         | 20.3%    |              | 6000-6500         | 1904         | 21.3%    |              |
| 5500-6000         | 2230         | 26.1%    | Count of Ops | 5500-6000         | 2416         | 27.0%    | Count of Ops |
| 5000-5500         | 1815         | 21.2%    | % of Ops     | 5000-5500         | 1861         | 20.8%    | % of Ops     |
| 4500-5000         | 801          | 9.4%     |              | 4500-5000         | 734          | 8.2%     |              |
| 4000-4500         | 266          | 3.1%     |              | 4000-4500         | 251          | 2.8%     |              |
| 3500-4000         | 106          | 1.2%     |              | 3500-4000         | 90           | 1.0%     |              |
| 3000-3500         | 30           | 0.4%     |              | 3000-3500         | 29           | 0.3%     |              |
| 2500-3000         | 10           | 0.1%     |              | 2500-3000         | 6            | 0.1%     |              |
| <2500             | 2            | 0.0%     |              | Grand Total       | 8939         | 100%     | 5387         |
| Grand Total       | 8547         | 100%     | 5260         | 62%               |              |          | 60%          |

DAHJR MONTHLY



**May-2017**

| Altitude MSL (ft)  | Count of Ops | % of Ops    |
|--------------------|--------------|-------------|
| 9000-9500          | 2            | 0.0%        |
| 8500-9000          | 1            | 0.0%        |
| 8000-8500          | 3            | 0.0%        |
| 7500-8000          | 14           | 0.1%        |
| 7000-7500          | 71           | 0.8%        |
| 6500-7000          | 296          | 3.2%        |
| 6000-6500          | 2704         | 28.9%       |
| 5500-6000          | 3773         | 40.4%       |
| 5000-5500          | 1707         | 18.3%       |
| 4500-5000          | 551          | 5.9%        |
| 4000-4500          | 162          | 1.7%        |
| 3500-4000          | 47           | 0.5%        |
| 3000-3500          | 11           | 0.1%        |
| 2500-3000          | 1            | 0.0%        |
| <b>Grand Total</b> | <b>9343</b>  | <b>100%</b> |

**Jul-2017**

| Altitude MSL (ft)  | Count of Ops | % of Ops    |
|--------------------|--------------|-------------|
| >9500              | 1            | 0.0%        |
| 9000-9500          | 0            | 0.0%        |
| 8500-9000          | 5            | 0.1%        |
| 8000-8500          | 8            | 0.1%        |
| 7500-8000          | 14           | 0.1%        |
| 7000-7500          | 60           | 0.6%        |
| 6500-7000          | 290          | 2.9%        |
| 6000-6500          | 2919         | 29.6%       |
| 5500-6000          | 4251         | 43.1%       |
| 5000-5500          | 1672         | 16.9%       |
| 4500-5000          | 464          | 4.7%        |
| 4000-4500          | 134          | 1.4%        |
| 3500-4000          | 35           | 0.4%        |
| 3000-3500          | 12           | 0.1%        |
| 2500-3000          | 1            | 0.0%        |
| <2500              | 1            | 0.0%        |
| <b>Grand Total</b> | <b>9867</b>  | <b>100%</b> |

Count of Ops % of Ops

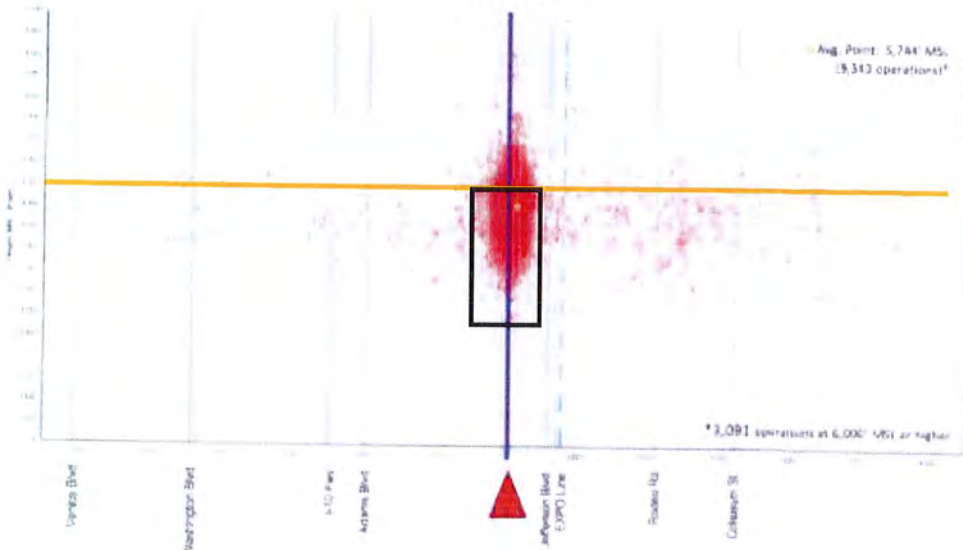
Count of Ops % of Ops

6252 67%

6570 67%

**This Noise Zone is an Entirely New Phenomenon**

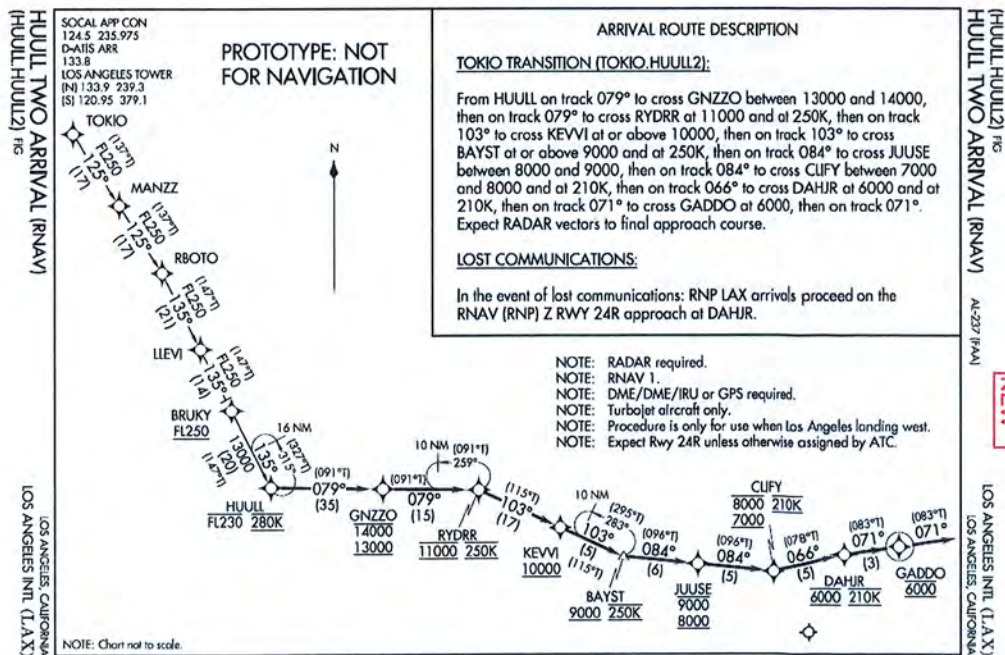
**Aircraft Gate Penetration Plot at "DAHJR"**  
 (Centered near S. Redondo Blvd and Blackwelder St)  
 May 1-31, 2017





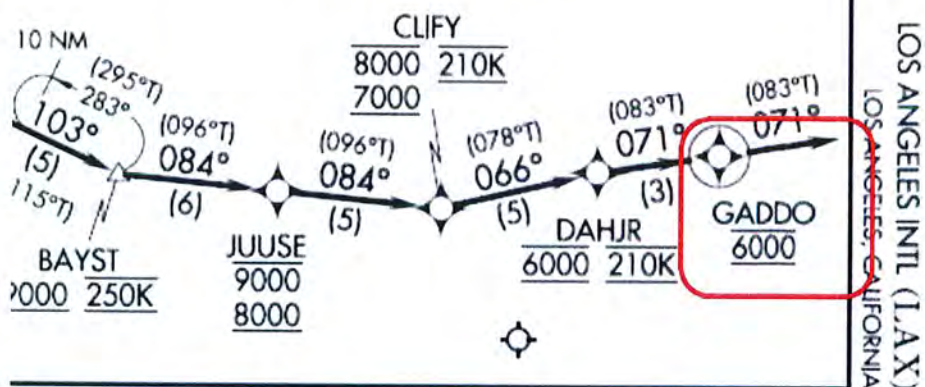
# FAA's Proposed Revisions to HUULL, IRNMN, RYDRR

## HUULL 2 – Proposed Revision at Flight Check



## HUULL 2 – Blow up of LA Basin end of approach

- NOTE: RADAR required.
- NOTE: RNAV 1.
- NOTE: DME/DME/IRU or GPS required.
- NOTE: Turbojet aircraft only.
- NOTE: Procedure is only for use when Los Angeles landing west.
- NOTE: Expect Rwy 24R unless otherwise assigned by ATC.



NEW

## HUULL 1 – Blow up of LA Basin end of approach

**ARRIVAL ROUTE DESCRIPTION**

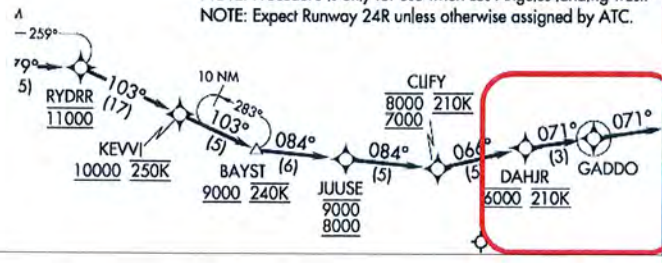
**TOKIO TRANSITION (TOKIO.HUULL1)**

From HUULL on track 079° to cross GNZZO between 14000 and 16000, then on track 079° to cross RYDRR at 11000, then on track 103° to cross KEVVI at or above 10000 and at 250K, then on track 103° to cross BAYST at or above 9000 and at 240K, then on track 084° to cross JUUSE between 8000 and 9000, then on track 084° to cross CLIFY between 7000 and 8000 and at 210K, then on track 066° to cross DAHJR at 6000 and at 210K, then on track 071° to GADDO, then on track 071°. Expect RADAR vectors to final approach course.

**LOST COMMUNICATIONS**

In the event of lost communications: RNP LAX arrivals proceed on the RNAV (RNP) Z RWY 24R approach at DAHJR.

- NOTE: RADAR required.
- NOTE: RNAV 1.
- NOTE: DME/DME/IRU or GPS required.
- NOTE: Turbojet aircraft only.
- NOTE: Procedure is only for use when Los Angeles landing west.
- NOTE: Expect Runway 24R unless otherwise assigned by ATC.



(HUULL1) 17117  
 HUULL ONE ARRIVAL (RNAV)  
 A-237 (FAA)

OLD



# Why is GADDO getting a Min Alt now?

FAAO 8260.3C, par 2-2-1 (f)(6)(b) (effective March 14, 2016)

**If the STAR authorizes radar vectors after the termination fix/NAVAID, an altitude is required at the termination fix and that altitude must be at or above the minimum vectoring altitude (MVA) and/or minimum IFR altitude (MIA) (as applicable).** If the STAR authorizes radar vectors after the termination fix/NAVAID and does not join an approach, then the altitude authorized at the termination fix should be a mandatory altitude.

**Note: If the STAR termination fix will be authorized for either joining an approach or for radar vectors, the altitude must match the approach altitude [see paragraph 2-2-1.f(6)(a)] and must be above the MVA/MIA [see paragraph 2-2-1.f(6)(b)].**

FEDERAL AVIATION ADMINISTRATION  
FLIGHT STANDARDS SERVICE  
STANDARD TERMINAL ARRIVAL (STAR)

Bearings, headings, courses, tracks and radials are magnetic. Elevations and altitudes are in feet, MSL. Altitudes are minimum altitudes unless otherwise indicated. Distances are in nautical miles (NM), graphic depictions attached.

| Arrival Name | Number | STAR Computer Code | Superseded Number | Dated      | Effective Date |
|--------------|--------|--------------------|-------------------|------------|----------------|
| HUULL (RNAV) | TWO    | HUULL HUULL2       | ONE               | 04/27/2017 |                |

**ADDITIONAL FLIGHT DATA:**  
DME/DME ASSESSMENT: SUT (RNP 2.0)  
REFERENCE MAGNETIC VARIATION = KLAX 12E/2020  
DO NOT START PROCES.

**FLIGHT INSPECTED BY:**

| Name                         | Organization                  | Date       | Signature |
|------------------------------|-------------------------------|------------|-----------|
| <b>DEVELOPED BY:</b>         |                               |            |           |
| Robert E. Henry - FAA Lead   | Southern California Metroplex | 06/02/2017 |           |
| Jose Gonzalez, NATCA Co-Lead | Organization                  | Date       | Signature |
| <b>APPROVED BY:</b>          |                               |            |           |
| S. L. Shrimpton              | Acting Manager, WSC-OSG       | Date       | Signature |

**CHANGES:**

- ADDED BRUKY WAYPOINT AND RESTRICTION AT OR ABOVE FL250 BETWEEN LLEVI AND HUULL.
- AMENDED MEA BETWEEN TOKIO/MANZZ, MANZZ/RBOTO, RBOTO/LLEVI FROM 14000 TO FL250, BETWEEN BRUKY/HUULL FROM 14000 TO 13000.
- CHANGED RESTRICTION AT HUULL FROM "AT OR BELOW FL250" TO "AT OR BELOW FL230".
- CHANGED RESTRICTION AT GNZOO FROM "BETWEEN 14000 AND 18000" TO "BETWEEN 13000 AND 14000".
- ADDED SPEED RESTRICTION AT RYDRR "AT 250K".
- REMOVED SPEED RESTRICTION AT KEVVI "AT 250K".
- CHANGED SPEED RESTRICTION AT BAYST FROM "240K" TO "250K".
- ADDED RESTRICTION "AT 6000" TO GADDO WAYPOINT.
- REMOVED RESTRICTION FROM 071.00 TO 071.01.

**REASONS:**

- ATC REQUEST FOR SEPARATION FROM CROSSING DEPARTURE AIRCRAFT.
- CORRECTED MEA TO MATCH OPERATIONAL MINIMUM RESTRICTIONS AT BRUKY AND GNZOO.
- ATC REQUEST FOR IMPROVED SEQUENCING OF ARRIVALS.
- IAW FAAO 8260.3C PARA 2-2-1h.
- REQUIRED PER FAAO 8260.3C PARA 2-2-1(f)(6)(b).
- ALIGN WITH LEG INTO GADDO.

QUALITY  
14  
CHECKED

FAA Form 8260-17, 1 (06/15) Generated by: TARGETS: 5.3.0, WGS84: 3.2.2 (07/20/17), Common RS: 2.2.0 (07/21/17), RNAV STAR RS: 2.1.0 (07/21/17)

Page 2 of 3

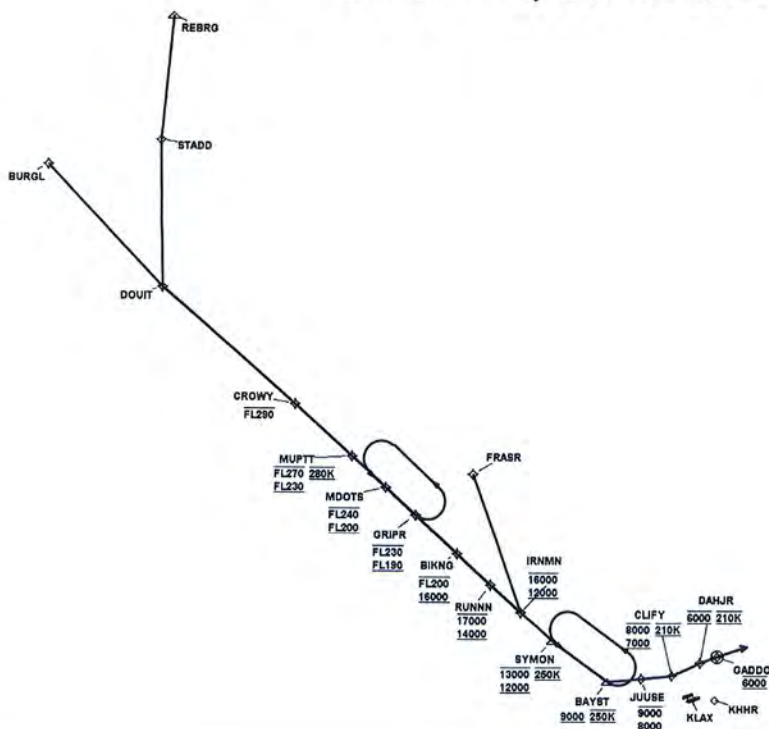
### CHANGES:

1. ADDED BRUKY WAYPOINT AND RESTRICTION AT OR ABOVE FL250 BETWEEN LLEVI AND HUULL.
2. AMENDED MEA BETWEEN TOKIO/MANZZ, MANZZ/RBOTO, RBOTO/LLEVI FROM 14000 TO FL250, BETWEEN BRU
3. CHANGED RESTRICTION AT HUULL FROM "AT OR BELOW FL250" TO "AT OR BELOW FL230".
4. CHANGED RESTRICTION AT GNZOO FROM "BETWEEN 14000 AND 16000" TO "BETWEEN 13000 AND 14000".
5. ADDED SPEED RESTRICTION AT RYDRR "AT 250K".
6. REMOVED SPEED RESTRICTION AT KEVVI "AT 250K".
7. CHANGED SPEED RESTRICTION AT BAYST FROM "240K" TO "250K".
8. ADDED RESTRICTION "AT 6000" TO GADDO WAYPOINT.
9. FM LEG CHANGED FROM 071.00 TO 071.01.

### REASONS:

- 1, 3, 4. ATC REQUEST FOR SEPARATION FROM CROSSING DEPARTURE AIRCRAFT.
2. CORRECTED MEA TO MATCH OPERATIONAL MINIMUM RESTRICTIONS AT BRUKY AND GNZOO.
- 5, 6. ATC REQUEST FOR IMPROVED SEQUENCING OF ARRIVALS.
7. IAW FAAO 8260.3C PARA 2-2-1b.
8. REQUIRED PER FAAO 8260.3C PARA 2-2-1f(8)(b).
9. ALIGN WITH LEG INTO GADDO.

## IRNMN 2 – Proposed Revision at Flight Check

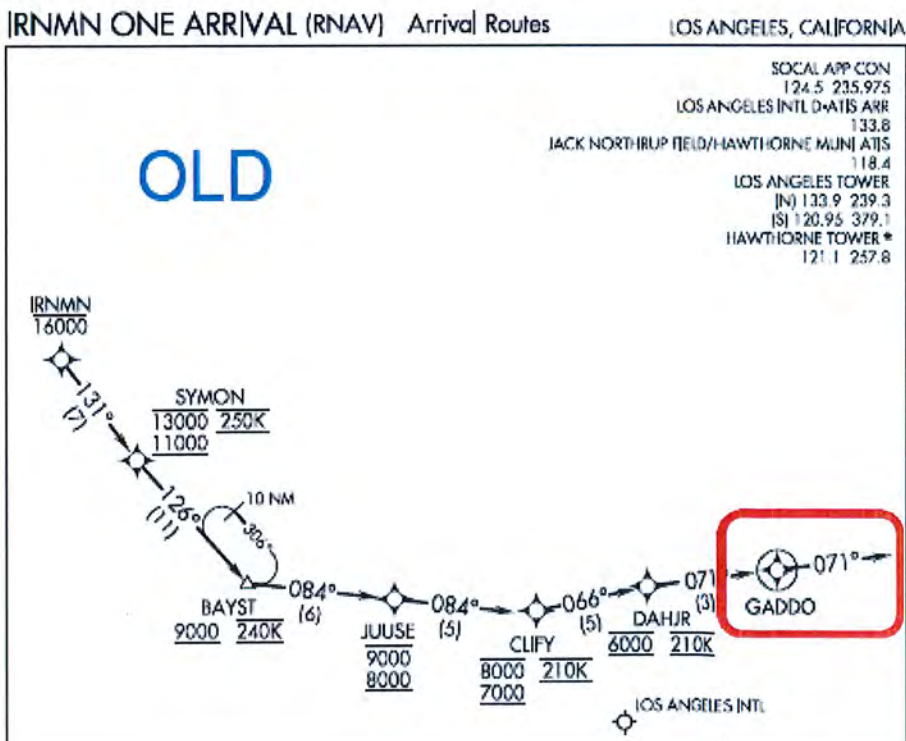




# IRNMN 2 – Blow up of LA Basin end of approach



# IRNMN 1 – Blow up of LA Basin end of approach



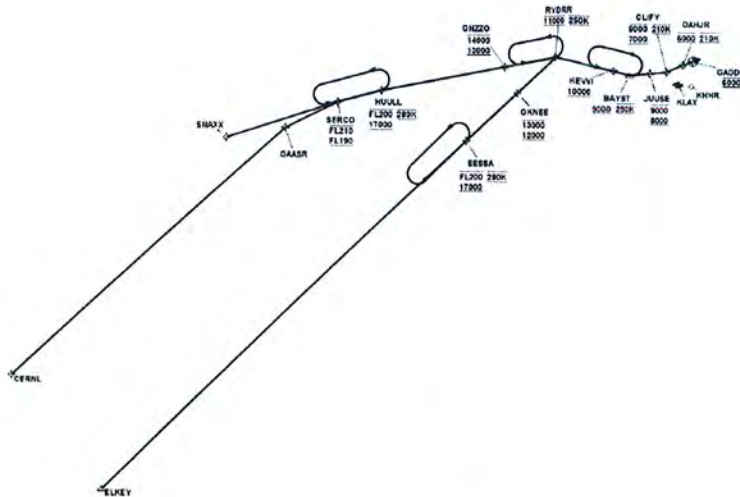
# RYDRR 2 – Proposed Revision at Flight Check

FEDERAL AVIATION ADMINISTRATION  
FLIGHT STANDARDS SERVICE  
STANDARD TERMINAL ARRIVAL (STAR)

Bearings, headings, courses, tracks and radials are magnetic. Elevations and altitudes are in feet, AGL. Altitudes are minimum altitudes unless otherwise indicated. Distances are in nautical miles (NM). Graphic depiction attached.

| Arrival Name | Number | STAR Computer Code | Superseded Number | Dated      | Effective Date |
|--------------|--------|--------------------|-------------------|------------|----------------|
| RYDRR (RNAV) | TWO    | RYDRR RYDRR2       | ONE               | 04/27/2017 |                |

Graphic Depiction 1



## RYDRR 2 – Blow up of LA Basin end of approach

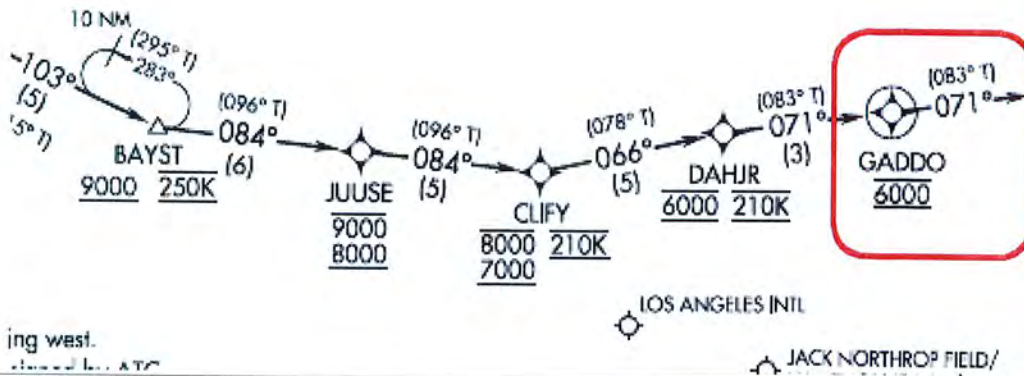
NOT  
ATION



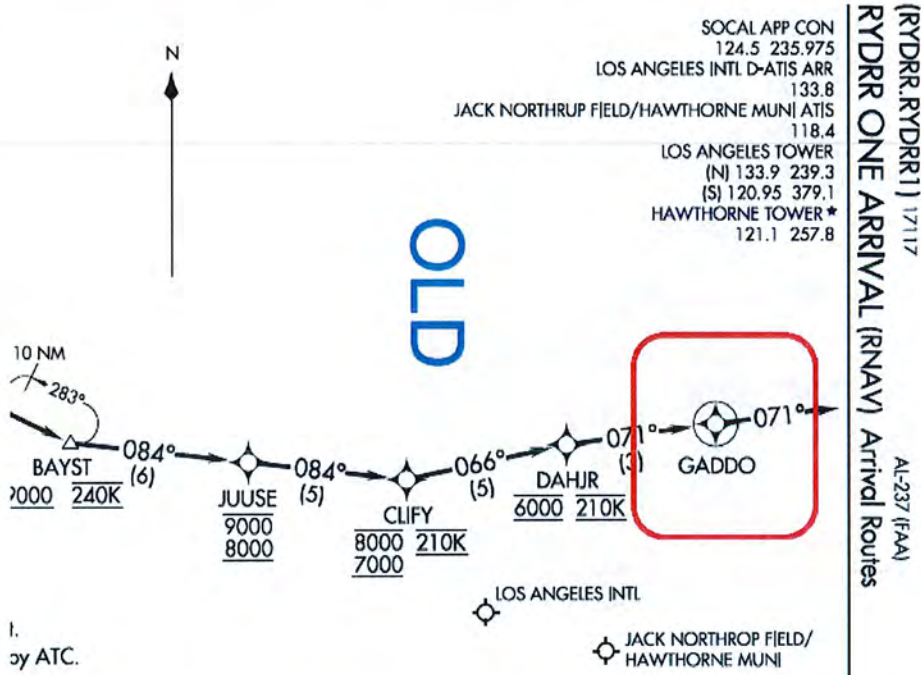
SOCAL APP CON 124.5 235.975  
LOS ANGELES INTL D-ATIS ARR 133.8  
JACK NORTHROP FIELD/HAWTHORNE MUNI ATIS 118.4  
LOS ANGELES TOWER  
[N] 133.9 239.3  
[S] 120.95 379.1

(RYDRR, RYDRR2) FIG  
RYDRR TWO ARRIVAL (RNAV) Arrival Routes  
AL-237 (FAA)

**NEW**



RYDRR 1 – Blow up of LA Basin end of approach



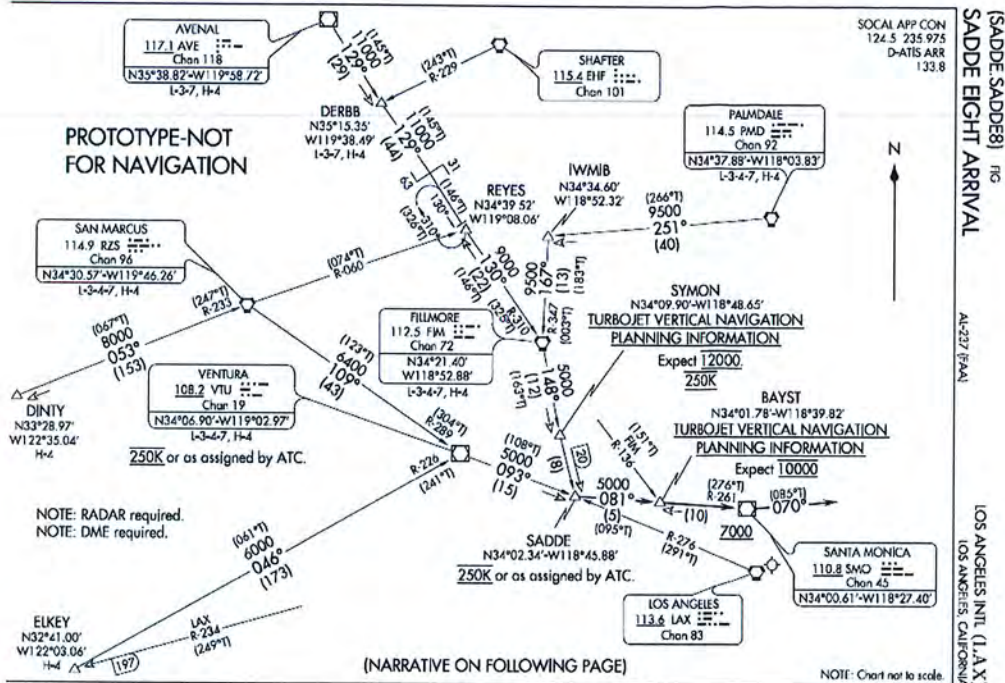
## GROUP #2

Revision: **SADDE 8**

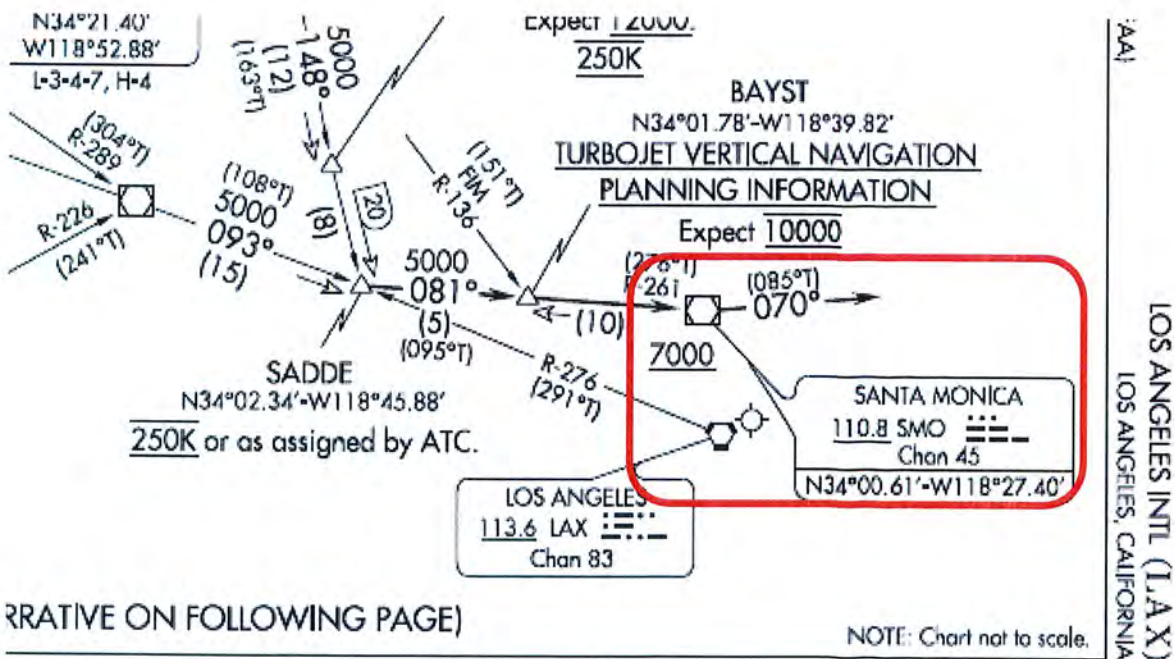
SADDE 8 is not RNAV



# SADDE 8- Proposed Revision at Flight Check

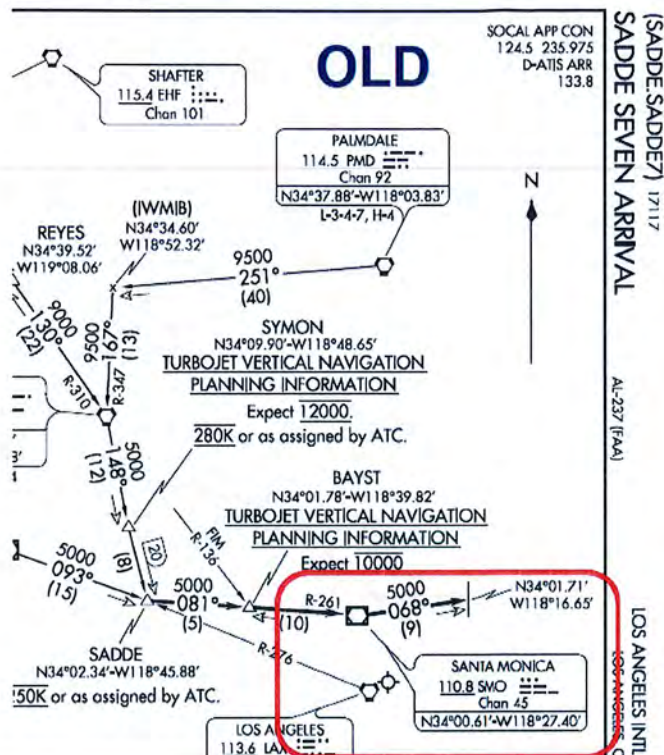


## SADDE 8 - Blow up of LA Basin end of approach





# SADDE 7 – Blow up of LA Basin end of approach



## GROUP #3

### New Procedure: BAYST 1

BAYST 1 is RNAV

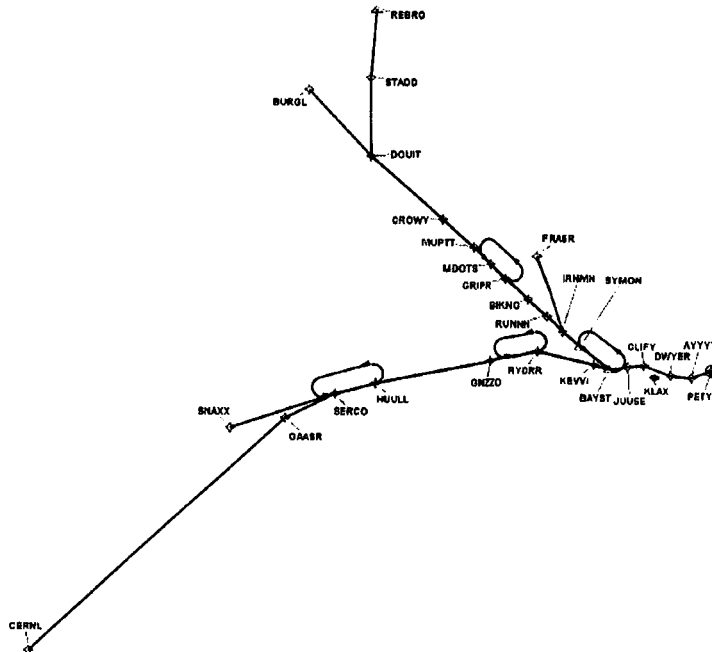
# BAYST 1 – New Procedure

FEDERAL AVIATION ADMINISTRATION  
 FLIGHT STANDARDS SERVICE  
 STANDARD TERMINAL ARRIVAL (STAR)

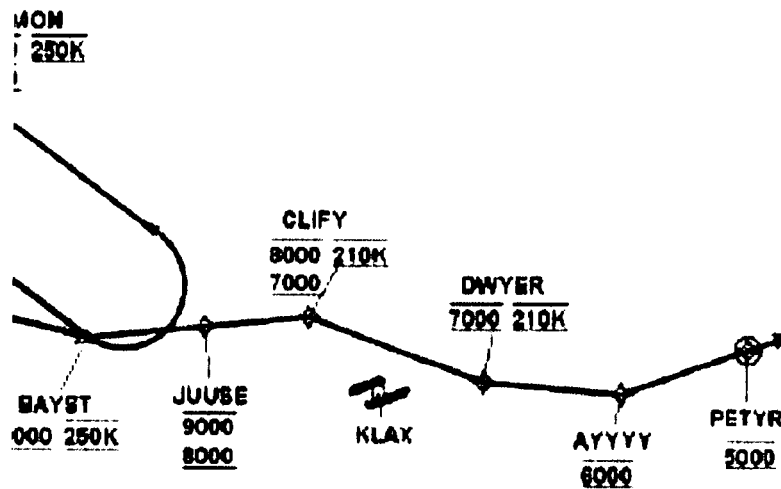
bearings, headings, courses, tracks and radials are magnetic. Elevations and altitudes are in feet. MSL. Altitudes are minimum altitudes unless otherwise indicated. Distances are in nautical miles (NM). Graphic depictions attached.

| Arrival Name | Number | STAR Computer Code | Superseded Number | Date |
|--------------|--------|--------------------|-------------------|------|
| BAYST (RNAV) | ONE    | BAYST,BAYST1       | NONE              |      |

Graphic Depiction 1



## BAYST 1 – Blow up of LA Basin end of approach



FEDERAL AVIATION ADMINISTRATION  
FLIGHT STANDARDS SERVICE  
STAR (DATA RECORD)

| Arrival Name | Number | STAR Computer Code | Superseded |
|--------------|--------|--------------------|------------|
| BAYST (RNAV) | ONE    | BAYST.BAYST1       | NONE       |

| FIX/NAVAID | LAT/LONG                 | C | FO/FB | LEG TYPE | TC     | DIST (NM) | ALTITUDE      |
|------------|--------------------------|---|-------|----------|--------|-----------|---------------|
| BYMON      | 340054.20N / 1180409.05W | Y | FB    | TF       | 142.64 | 06.83     | 12000/10000   |
| BAYST      | 340146.73N / 1183949.20W | Y | FB    | TF       | 137.65 | 10.93     | AT/ABOVE 6000 |

| En Route Transition |                          |   |    |    |        |       |                |
|---------------------|--------------------------|---|----|----|--------|-------|----------------|
| RYDRR               | 341110.05N / 1190347.38W | Y |    | IF |        |       | AT 11000       |
| KEVVI               | 340352.14N / 1184508.94W | Y | FB | TF | 115.12 | 17.10 | AT/ABOVE 10000 |
| BAYST               | 340146.73N / 1183949.20W | Y | FB | TF | 115.20 | 04.90 | AT/ABOVE 6000  |

| En Route Transition |                          |   |    |    |        |       |                |
|---------------------|--------------------------|---|----|----|--------|-------|----------------|
| SNAXX               | 340822.24N / 1205838.76W | Y |    | IF |        |       |                |
| SERCO               | 341131.24N / 1201908.34W | Y | FB | TF | 084.34 | 32.93 | FL1900BFL210   |
| HUULL               | 341205.81N / 1200357.13W | Y | FB | TF | 087.31 | 12.61 | 17000BFL200    |
| GNZZO               | 341128.14N / 1192133.90W | Y | FB | TF | 090.82 | 35.16 | 13000B14000    |
| RYDRR               | 341110.05N / 1190347.38W | Y | FB | TF | 091.09 | 14.75 | AT 11000       |
| KEVVI               | 340352.14N / 1184508.94W | Y | FB | TF | 115.12 | 17.10 | AT/ABOVE 10000 |
| BAYST               | 340146.73N / 1183949.20W | Y | FB | TF | 115.20 | 04.90 | AT/ABOVE 6000  |

| Common Route |                          |   |    |    |        |       |               |
|--------------|--------------------------|---|----|----|--------|-------|---------------|
| BAYST        | 340146.73N / 1183949.20W | Y |    | IF |        |       | AT/ABOVE 6000 |
| JUUSE        | 340109.55N / 1183314.68W | Y | FB | TF | 096.43 | 05.50 | 8000B6000     |
| CLIFY        | 340036.84N / 1182725.58W | Y | FB | TF | 096.43 | 04.87 | 7000B8000     |
| DWYER        | 335602.21N / 1181839.51W | Y | FB | TF | 122.02 | 08.60 | AT 7000       |
| AYYYY        | 335409.81N / 1181115.25W | Y | FB | TF | 108.84 | 06.44 | AT 6000       |
| PETYR        | 335454.48N / 1180343.50W | Y | FO | TF | 083.20 | 06.31 | AT 5000       |
| KLAX         |                          |   |    | FM | 083.20 |       |               |

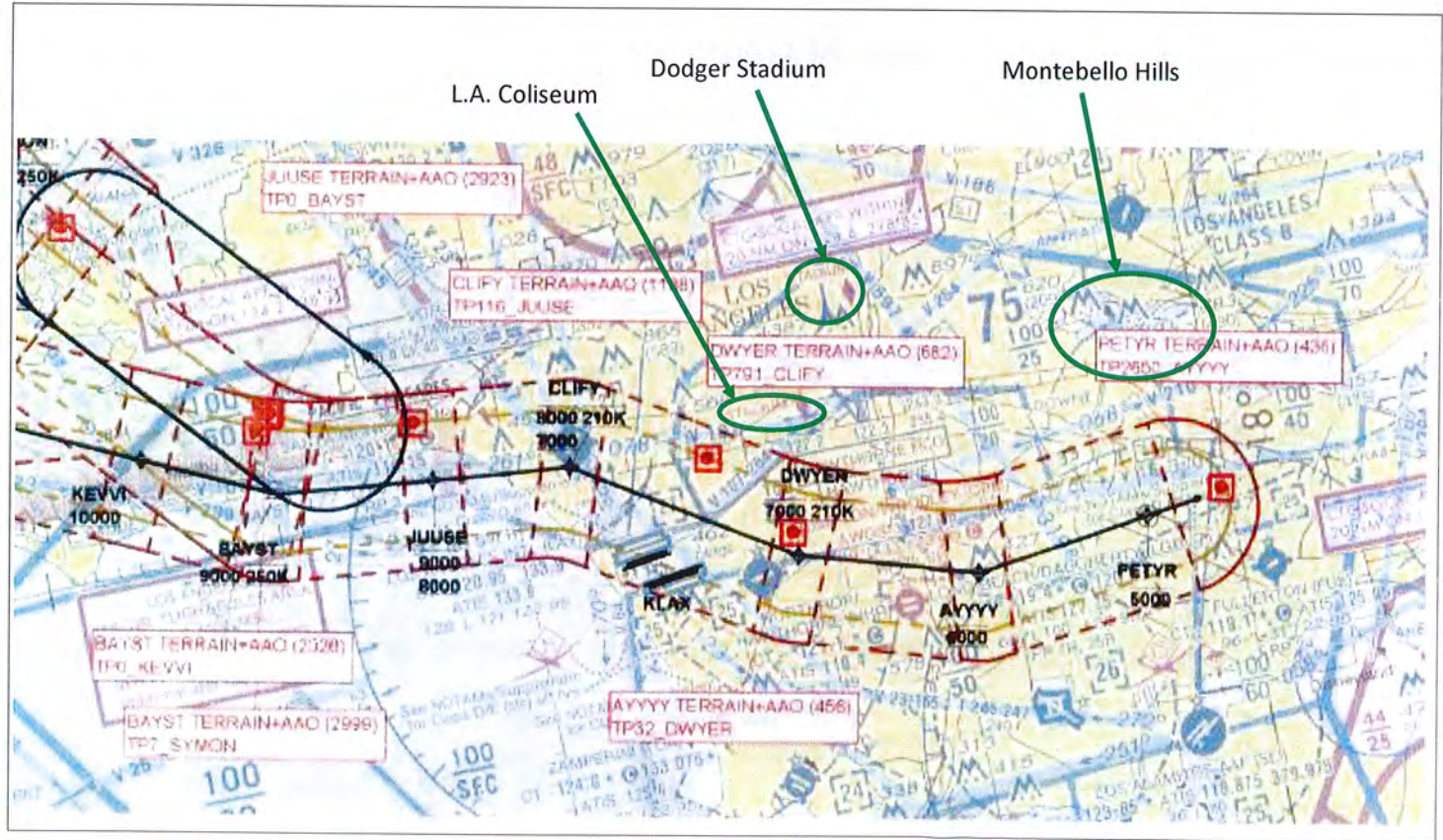
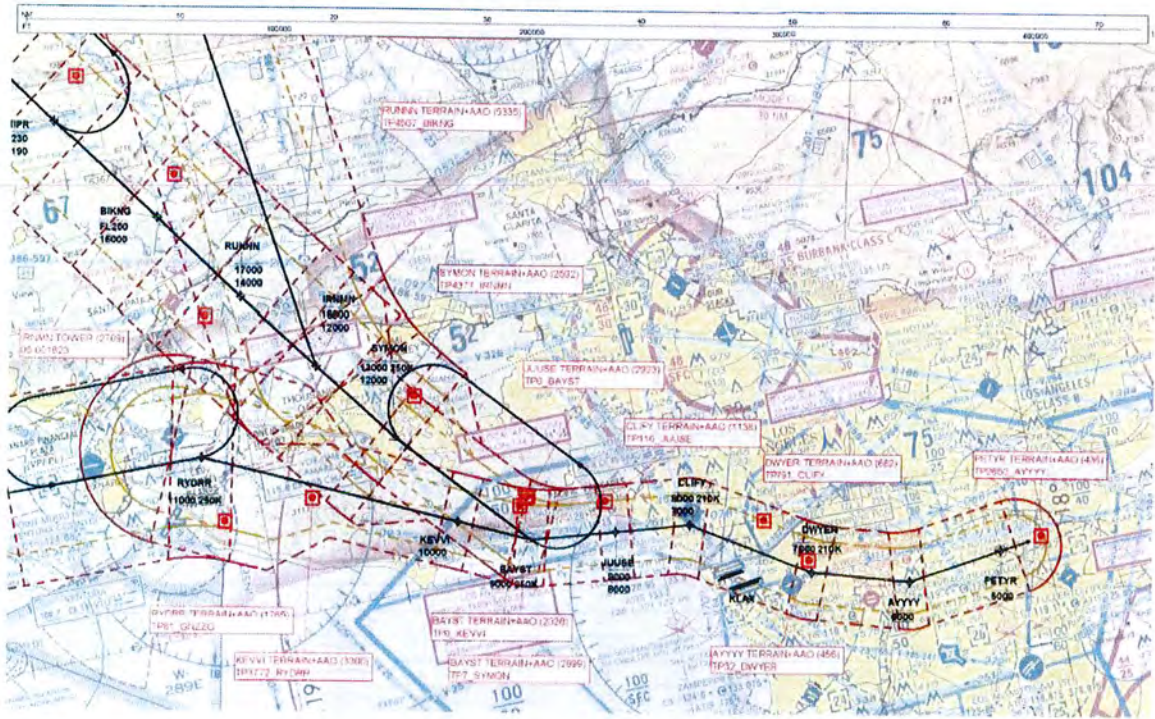
Google Maps

Los Angeles

BAYST 1 – New Procedure –  
Approx locations of way points

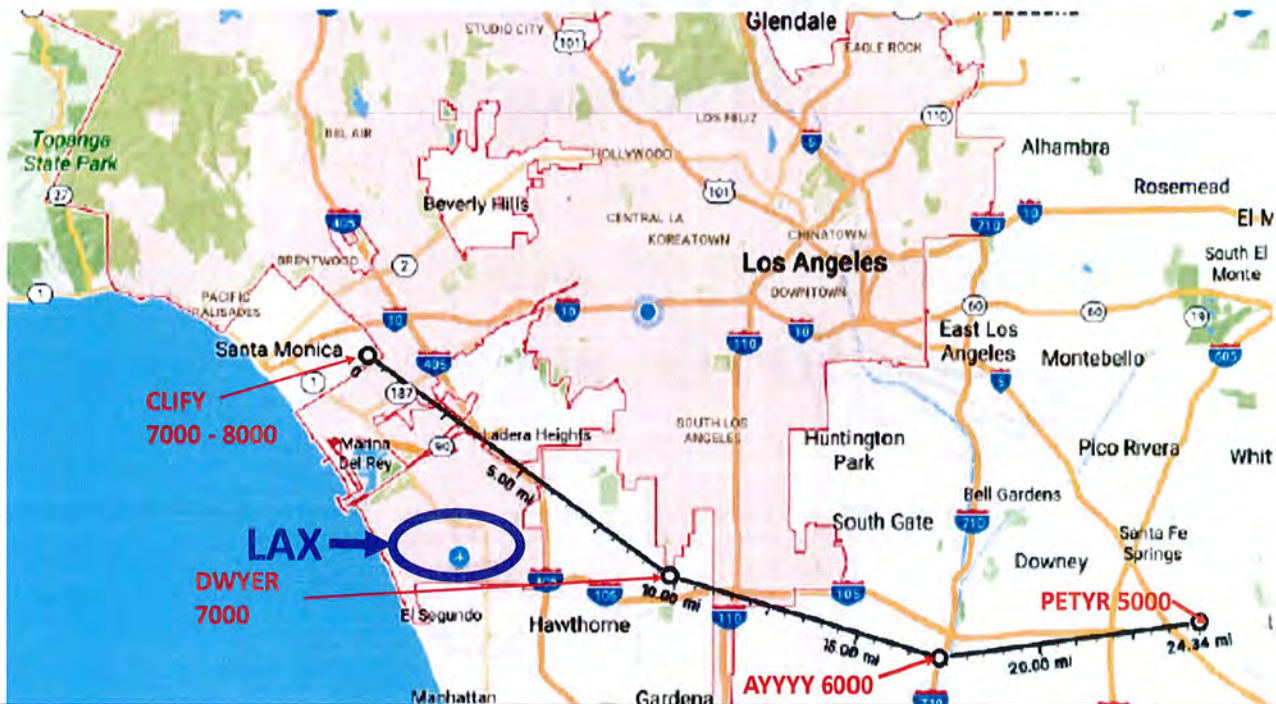








# Google Maps Los Angeles **BAYST 1 – New Procedure –** **Approx locations of way points**



## FEDERAL AVIATION ADMINISTRATION FLIGHT STANDARDS SERVICE STANDARD TERMINAL ARRIVAL (STAR)

Bearings, headings, courses, tracks and radials are magnetic. Elevations and altitudes are in feet, MSL. Altitudes are minimum altitudes unless otherwise indicated. Distances are in nautical miles (NM). Graphic depictions attached.

| Arrival Name    | Number                    | STAR Computer Code | Superseded Number | Dated      | Effective Date |       |      |     |                            |
|-----------------|---------------------------|--------------------|-------------------|------------|----------------|-------|------|-----|----------------------------|
| BAYST (RNAV)    | ONE                       | BAYST.BAYST1       | NONE              |            |                |       |      |     |                            |
| Transition Name | Transition Computer Codes | From FIX/NAVAID    | To FIX/NAVAID     | Mag Course | Distance       | MEA   | MOCA | MAA | Crossing Altitudes / Fixes |
|                 |                           |                    | RYDRR             | 079.09     | 14.75          | 11000 | 3800 |     | AT 11000                   |
|                 |                           |                    | KEVVI             | 103.12     | 17.10          | 10000 | 5400 |     | AT/ABOVE 10000             |
|                 |                           |                    | BAYST             | 103.20     | 04.90          | 9000  | 4600 |     | AT/ABOVE 9000              |

### ARRIVAL ROUTE DESCRIPTION:

FROM BAYST ON TRACK 094.43/5.60 TO CROSS JULUSE BETWEEN 8000 AND 9000, THEN ON TRACK 094.43/4.87 TO CROSS CLIFY BETWEEN 7000 AND 8000 AND AT 210 KIAS, THEN ON TRACK 110.02/8.60 TO CROSS DWYER AT 7000 AND AT 210 KIAS, THEN ON TRACK 094.84/6.44 TO CROSS AYYYY AT 6000, THEN ON TRACK 071.20/6.31 TO CROSS PETYR AT 5000, THEN ON TRACK 071.20 OR AS ASSIGNED BY ATC. EXPECT RADAR VECTORS TO ILS OR RNAV (RNP) RUNWAY 25L FINAL APPROACH COURSE.

### PROCEDURAL DATA NOTES:

- NOTE: RADAR REQUIRED
- NOTE: RNAV 1
- NOTE: DME/DME/RU OR GPS REQUIRED
- NOTE: TURBOJET AIRCRAFT ONLY
- NOTE: EXPECT RWY 25L UNLESS OTHERWISE ASSIGNED BY ATC.
- NOTE: CERNL TRANSITION GPS REQUIRED.
- NOTE: BURGI, FRASR, HUULL, SNAXX, MUIPI, REBRG, RYDRR TRANSITIONS DME/DME/RU OR GPS REQUIRED
- NOTE: DO NOT FILE – TO BE ASSIGNED BY ATC.

### FIXES AND/OR HOLDING PATTERNS:

- CHART HOLDING AT BAYST: HOLD NW, LT, 125.85 INBOUND, 10 NM LEGS.
- CHART HOLDING AT GRIPR: HOLD NW, LT, 132.49 INBOUND, 10 NM LEGS.
- CHART HOLDING AT HUULL: HOLD W, LT, 075.31 INBOUND, 16 NM LEGS.
- CHART HOLDING AT RYDRR: HOLD W, LT, 079.09 INBOUND, 10 NM LEGS.

### COMMUNICATIONS:

SOCAL APP CON, LAX ATCT (N/S), LAX ATIS

Discussion of each Group and  
Procedure

&

Consideration of whether to take  
action on any or all

More new or revised procedures might be in the works.

Information that the FAA shared with Industry April 27-30, 2017, just before the implementation of NextGen at LAX

The following slides are excerpted from the FAA's slide show that accompanied 4 days of teleconference and web-based interactive briefings with industry.

The National Business Aviation Association (NBAA) posted the FAA slide show on the NBAA website:

[https://www.nbaa.org/ops/airspace/regional/western/SoCal\\_041117\\_Metroplex\\_April\\_27\\_Chart\\_Brief\\_V3.pdf](https://www.nbaa.org/ops/airspace/regional/western/SoCal_041117_Metroplex_April_27_Chart_Brief_V3.pdf)



# Optimization of Airspace and Procedures in the Metroplex



SoCal Metroplex Project Update  
April 27, 2017 Chart Update  
April 12, 2017

To: Project Update  
By: Rob Henry, SoCal D&I Integration Manager  
Jose Gonzalez, SoCal NATCA D&I Lead



Federal Aviation  
Administration



## Agenda

- Metroplex Actions to Date
- **Legal Challenges**
- Community Engagement Activities
- April 27 Procedures
- **Open Bridge, Briefing and Telcon Schedule**
- SCT Frequency Relocation for Metroplex
- LAX RWY 07L/25R RSA and Construction Project
- Traffic Management Initiatives for April 27
- Air Traffic Training Update
- **Potential Community Issues**
- Post Implementation Procedure Amendments



Federal Aviation  
Administration



## Legal Action Pending *Current as of March 28*

- Culver City
  - Proposed solution being reviewed by Metroplex Team as of March 15
- Steve Murray - Citizen of Culver City
  - No proposal to date
- Santa Monica Canyon - Taber Law Firm provided mitigation
  - Response prepared by Metroplex Team
- Benedict Canyon - Taber Law Firm provided mitigation
  - Response prepared by Metroplex Team
- Proposed action(s) grouped together and deferred for 180 days
  - County of Orange – County provided mitigation-awaiting April 27, 2017 implementation
  - Newport Beach - Remy Law Firm provided mitigation
  - Laguna Beach - City provided mitigation
- Donald Vaughn - Citizen of San Diego - provided mitigation



## Open Bridge and Briefing Schedule

- **Open Conference Bridge**
  - (888) 335-6670 Passcode 153783
  - 24/7 starting April 27 2017 0001 PDT
  - April 27 2017 0100 PDT  
Weather and  
Implementation Status  
Briefing
- **Headquarters Conference Calls**
  - April 27 and 28 2017
    - 0300 PDT
    - 0600 PDT
    - 1000 PDT
    - 1700 PDT
  - April 29 and 30 2017
    - 0600 PDT



## Industry Briefing Schedule via GoToMeeting

- April 27, 2017 0700 PDT
  - (571) 317-3122
  - Passcode 534-821-189
- April 27, 2017 1700 PDT
  - (872) 240-3212
  - Passcode 733-098-133
- April 28, 2017 0700 PDT
  - (669) 224-3412
  - Passcode 781-676-269
- April 28, 2017 1700 PDT
  - (872) 240-3412
  - Passcode 307-508-901
- April 29, 0800 PDT
  - (571) 317-3112
  - Passcode 997-762-693



## POTENTIAL COMMUNITY AND PROCEDURE ISSUES



## LAX IRNMN HUULL & RYDR STAR

- The plaintiff has proposed a change to these STARs on the north downwind arrival flow to LAX
- The proposals have been reviewed by the Design Team and a response prepared for review by legal counsel



# Questions?



# APRIL 27, 2017 PROCEDURES GRAPHICS

## LAX\_HHR IRNMN ONE ARRIVAL (RNAV)



**LAX** Los Angeles International

**STARs (Arrivals)**  
LAX IRNMN ONE (RNAV)

**IRNMN ONE**

- Serves LAX arrivals from the north to the west
- Ties into new LAX HHR approaches at DANIR
- The DANIR waypoint has a vertical restriction of 6,000 feet which will cause arrivals to remain at higher altitudes than current state until east of Culver City
- KORMC moved further offshore