May 23, 2018

Daniel K. Elwell
Acting Administrator
Federal Aviation Administration
800 Independence Ave, S.W.
Washington, DC 20591

Dear Mr. Elwell:

The FAA recently began to engage with the LAX Community Roundtable in discussions about noise impacts from the North Arrival procedures into LAX in the new SoCal Metroplex. When the Roundtable first began communicating with the FAA about the new noise problems resulting from the Metroplex, we explained that we were addressing North Arrivals altitudes over the City of Los Angeles first (especially waypoint DAHJR), but that this was not the only issue prompting numerous complaints from area residents and communities.

We are writing now to bring a second Metroplex related problem to your attention and to request that the FAA please work with us to resolve it.

There has been a significant uptick in noise complaints about a dramatic increase in jet overflights across the Palos Verdes Peninsula from LAX departures. The Palos Verdes Peninsula is South of LAX. Problems from overflights were mitigated many years ago. The new Metroplex procedures were not supposed to increase overflights. In fact, they were promised to decrease overflights.

Unfortunately, as with the problem of North Arrival flights not meeting the assigned altitude restriction at DAHJR, the new SID procedures that were to direct flights around Palos Verdes Peninsula have not been followed in a large number of cases. Overflights have dramatically increased contrary to promises and published procedures. It looks to us like there might be some common problems of implementation at the local level, maybe with ATC or in the Standard Operating Procedures that perhaps were revised to implement the Metroplex.

In order to address noise impacts associated with turboprop and jet aircraft flying above the Palos Verdes Peninsula, on March 14, 2018, the LAX Community Noise Roundtable voted unanimously to transmit three specific requests to the FAA:

1. Air traffic controllers to adhere to the OSHNN8 published procedure.

The Southern California Metroplex was not supposed to alter the long-standing mitigation that has jets departing LAX southbound fly around the Palos Verdes Peninsula, rather than fly over the Peninsula, between 9PM and 7AM. The new SID OSHNN8 was not supposed to change this noise abatement procedure.

Noise studies conducted by the FAA prior to Metroxplex implementation predicted there would be a reduction in noise on the Palos Verdes Peninsula under the new SID OSHNN8 procedure.

According to the Los Angeles World Airports (LAWA) statistics, Peninsula jet overflights averaged less than 200 per month prior to Metroplex implementation. Unfortunately, after Metroplex implementation, Peninsula jet overflights have more than doubled to 455 Peninsula overflights per month. This is affecting four cities on the Peninsula in addition to the City of Los Angeles San Pedro. Therefore, the Roundtable requests that air traffic controllers adhere to the OSHNN8 published procedure as presented during the Southern California Metroplex public hearings and Environmental Noise Assessment studies.

2. **When necessary for spacing, air traffic controllers vector jets from the OSHNN8 procedure beginning east of the HOLTZ WAYPOINT**.

The Roundtable understands that air traffic controllers sometimes need to vector jets from published procedures for safety. However, the Roundtable has been presented with evidence from a City of Rancho Palos Verdes citizen and the Roundtable representative for Rancho Palos Verdes that suggests some or much of the vectoring is not necessitated by safety concerns or traffic congestion.   Recordings of air traffic controller communications with pilots and recordings of flight radar video show a frequent lack of surrounding aircraft when jets were vectored. This makes us wonder whether air traffic controllers are vectoring based on convenience.

The Roundtable notes that SCT standard operating procedure 8-3-2.a delineates distance and altitude policies when vectoring near or over the Peninsula.   Therefore, the Roundtable requests when that, when necessary for legitimate spacing, air traffic controllers vector jets from the OSHNN8 procedure beginning east of the HOLTZ WAYPOINT. This will allow jets to overfly the ocean instead of the Peninsula and follow the OSHNN8 noise abatement procedure more closely.

3. **Air traffic controllers raise the 5,000-feet altitude restriction on Mokulele Airlines' Cessna Caravan turbo propellers overflying the Palos Verdes Peninsula.**

On July 12, 2017, LAWA staff noted that air traffic controllers were limiting Mokulele Cessna Caravan turbo propellers from overflying the Peninsula higher than 5,000 feet. The effect of the altitude restriction is lowering the oldest, loudest aircraft closest to Peninsula residents, which is exacerbated by early morning freight deliveries.

The Roundtable is not requesting a redesign of the Class Bravo airspace similar to RT letters written to the FAA in February 2004 and September 2012. Instead, the Roundtable notes a range of altitude between 5,000 feet to 9,000 feet which other turbo propellers overfly the Peninsula.

Even raising the altitude 1000-2000 feet for the Mokulele turbo propellers would help reduce the noise impact on Peninsula residents; therefore, the Roundtable requests that air traffic

controllers raise the 5,000-feet altitude restriction on Mokulele Airlines' Cessna Caravan turbo propellers overflying the Palos Verdes Peninsula.

Please give these requests serious consideration as the noise impacts affecting these communities have drastically increased and diminished the quality of life for many on the Palos Verdes Peninsula and the City of Los Angeles San Pedro. Thank you for your continued cooperation with the Roundtable.

Sincerely,

Denny Schneider
Chair, LAX Community Noise Roundtable

Geoff Thompson
Ad Hoc Committee Chair

Copy:

Tamara Swann, Western-Pacific Region Deputy Regional

Ad Hoc Committee Recommendations for key FAA Air Traffic Control Managers and Air Traffic Controllers from San Diego and Palmdale and key political stakeholders