



January 26, 2022

Raquel Girvin
Regional Administrator
Federal Aviation Administration
Western-Pacific Regional Office
777 S Aviation Blvd, Suite 150
El Segundo, CA 90245

Subject: LAX Community Noise Roundtable Priorities & Responsibilities

Dear Ms. Girvin:

The Metroplex Ad Hoc Committee Chair of the LAX/Community Noise Roundtable (Roundtable) raised concerns related to the FAA's proposal submittal process during the January 19, 2022 Roundtable meeting. Deputy Regional Administrator Tamara Swann was present in this meeting and suggested that the Roundtable follow up in writing to express our concerns in order to obtain clear answers about IFP Gateway submittal requirements and actions required to be completed before FAA actions are taken. This letter provides the requested information.

The LAX-Community Noise Roundtable is a 21-year old forum of elected representatives, community groups, Los Angeles World Airports (LAWA), and airlines that convenes to address aircraft noise issues. We continue to operate by consensus and serve as an advisory group to the FAA, which has ultimate authority and responsibility over aircraft in flight.

Roundtable members are concerned that several proposals have piled up with the FAA and that during the past five years little progress has been accomplished on any of them to move toward mitigation of impacts. We request an annotated GANTT chart be prepared from the FAA to the Roundtable that provides milestones so that we can understand what steps and decisions need to occur for proposed flight procedures to be implemented.

On December 22, 2021, FAA responded to the Roundtable regarding the approved submission of a LADYJ flight path change proposal. The proposal calls for shifting air traffic to a previously used flight path over the far western San Fernando Valley in the Los Angeles Basin. Several FAA statements in that letter and in discussions with LAWA caused concern for Roundtable leadership including the Roundtable Chair and Vice-Chair, its moderator, and LAWA staff. The concerns center around a potential FAA policy change on how your agency intends to work with us, shifting burden and responsibility from your agency, to the Roundtable, a largely volunteer-based organization, and LAWA, the City department that manages airfield and related activities at LAX.

The Roundtable remains dedicated to identifying aviation issues and working with the FAA to resolve and improve conditions for residents subjected to aircraft noise. Prior to ten years ago, the Roundtable didn't make specific flight path change requests; we highlighted issues and the FAA developed solutions before implementing specific flight path and/or policy changes. The FAA worked with LAWA who tracked noise issues and provided status updates for the Roundtable. The IFP portal has been around for many years, with the FAA maintaining its IFP portal efforts in parallel with FAA/Roundtable efforts. The FAA never previously required the Roundtable to submit requests via the IFP gateway prior to taking action, as it is now requiring with our LADYJ proposal.

With the advent of NextGen Metroplex implementation, many flight path changes have been implemented to take advantage of improved air traffic control technologies. Changes have resulted in increased aircraft noise concentrations over some communities and increased noise awareness and sensitivity throughout the US.

During the past six years, the FAA increased its focus on noise issues and expressly stated it intends to emphasize reducing aircraft noise on individuals residing and working around airports and along the flight paths connecting them. The FAA began advertising that Roundtables are its primary focal point for identification and resolution of noise issues, pointing to its Washington D.C. Noise Resolution teams and ombudsmen working with Roundtables.

In the second paragraph of your December 22, 2021 letter to the Roundtable you state:

As to your specific request to create a new departure procedure to replace the LADYJ, we ask that the Roundtable work with Los Angeles World Airports (LAWA) to submit this request via the Instrument Flight Procedures (IFP) Information Gateway. Please note that asking the LAX Roundtable to submit an IFP Information Gateway request does not constitute an approval or denial of the procedure; the entry ensures that the appropriate FAA parties review the request.

Farther down in the fourth paragraph of your December 22, 2021 letter to the Roundtable regarding the LADYJ proposal you state:

Additionally, if this proposal were to move forward, LAWA and/or the LAX Roundtable would be responsible for community engagement with the potentially impacted communities. The FAA would provide technical assistance with respect to briefing materials of proposed procedures or any federal actions.

The FAA has not previously asked the Roundtable to submit proposals via the IFP Information Gateway. As you know, the Roundtable is just that, a group with members sharing equal footing. If LAWA submits a proposal via the IFP Information Gateway on behalf of the Roundtable, we would like to know whether that constitutes an endorsement of the requested change to the procedure by LAWA. Our position as an organization is that LAWA should not have to support/concur with the change or agree to provide outreach before FAA conducts such a review. The FAA should review the request and provide both LAWA and the Roundtable with an assessment of the change and the potential impacts or implications. Only at that time can the Roundtable and LAWA determine whether to ask FAA to move forward with the request. Whether or not LAWA prepares a submittal should not have any effect on whether the FAA will study or analyze a Roundtable proposal that was reviewed and approved for submittal by our body. Please let us know if LAWA can submit the request on behalf of the Roundtable without supporting or concurring with the request and without committing to performing outreach before a review and the results of the FAA investigation is presented.

The Roundtable makes good faith evaluations of proposals. The Roundtable is a largely volunteer-based organization of community members, elected official staff, and airport noise office employees dedicated to improving the lives of people in the Los Angeles Basin affected by aircraft noise caused by FAA operations into and out of LAX. The FAA is the federal agency responsible for controlling all aspects of aircraft movement in the skies. It is the sole responsibility of the FAA to control where planes fly including their latitude, longitude, and altitude. Neither the Roundtable nor LAWA should be required to conduct community engagement since neither party is responsible for the implementation of potential flight procedure changes.

The Roundtable suggests ways to improve conditions for residents living under increasingly congested and noisy airspace. If the FAA determines that a suggestion made by the Roundtable is feasible and agrees to implement it, the FAA alone is responsible for community outreach. The recent decision in the City of Los Angeles vs. the

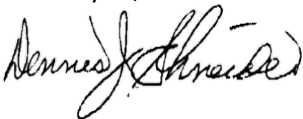
Federal Aviation Administration regarding community outreach for the GADDO waypoint affirms FAA responsibility for community outreach. Please confirm you agree or provide clarification if not.

Lastly, on January 19, 2022, Ms. Swann raised the question of proposal prioritization already put forth to the FAA. This is because the Roundtable has made proposals regarding 1) relocation of the JUUSE waypoint over the Pacific Ocean in 2019, 2) potentially leveraging an existing ANJLL arrivals flight path to route approximately thirty-one percent of North Downwind traffic off of existing procedures and on to a proposal known as Option B in 2021, and 3) reverting the LADYJ departure procedure to ameliorate noise for the far Western San Fernando Valley in 2021.

Default priority for these procedures from the Roundtable are first in, first out: JUUSE relocation being the first priority for analysis/work for the FAA (1), then Option B (2), and then LADYJ (3). The FAA should initially look at all proposals when received, and provide to us an estimate of the time it will take to determine feasibility of solutions. That said, if the FAA has done little analysis on the JUUSE proposal to date, and Option B analysis was confirmed by FAA staff Joseph Bert, Supervisor Aviation Technical Systems Specialist in Air Traffic Control, Renton, WA as being approximately "sixty percent complete" and should not take many more months for its initial evaluation to be completed, then the FAA should finish analysis on Option B and respond to the Roundtable with a timely response rather than stopping work on this proposal to work on JUUSE. Our hope in the Roundtable, however, is that all three proposals can be worked on concurrently. The Roundtable has been engaging with the FAA over problems with the North Downwind since at least 2016. We think 6 years of talking and little progress, federal litigation, and the amount of individuals impacted in the heavily populated Los Angeles Basin should be reason enough for priority treatment. Please inform us if you believe otherwise.

The LAX Community Noise Roundtable is putting proactive proposals forth to you, the one agency capable and tasked with helping us resolve our issues. We look forward to your thoughtful responses that show you and your agency are taking ownership and responsibility for the air traffic you are routing over our communities. We eagerly await your prompt response.

Thank you,



Denny Schneider, Chair
LAX/Community Noise Roundtable

cc: LAX/Community Noise Roundtable Members
Tamara Swann, Deputy Regional Administrator – Western Region
Michael Wilson, FAA Noise Ombudsman – Western Region