



RESTORING Environments to Pre-NextGen exposures
without bias for *Fair & Equal* Resolve.

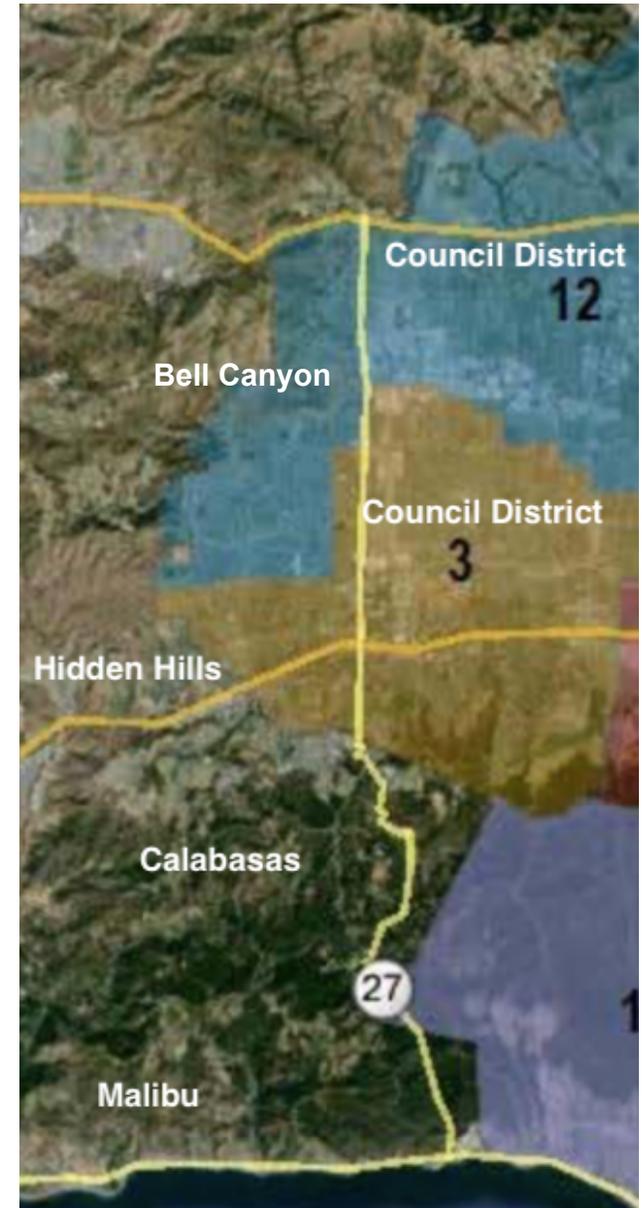
Background - LADYJ Amendment

- In September 2021, the LAX/Community Noise Roundtable met consensus and requested that the FAA assess a modified procedure chart (CASTA HYBRID) in order to correct the consequences that arose upon the arbitrary replacement of an established & safely functioning RNAV route CASTA SID, with another RNAV route, LADYJ.
- LADYJ violated new communities, previously not exposed to the westerly commercial procedure, and at altitudes under 10,000 ft AGL. The change was significant enough that it dramatically altered home and natural environments in, otherwise, quiet communities that intentionally established adjacent to wildlife preserves and parks/trails, which are outside of commercial land use zones.
- Los Angeles World Airports (LAWA) and the FAA Western Pacific Administrator's office delayed timely action for an OSG review by failing to submit the request per FAA protocol. The delay prevented the OSG from beginning an assessment in 2021. It was about six (6) months, and dedicated Roundtable effort, that finally jumped started the coveted OSG's attention to the procedure submission.
- The Roundtable turned an unwarranted and frustrating stall into a productive period by engaging in **more Community Outreach** and by considering a **second option** as a good faith "compromise" to the CASTA HYBRID. On March 16, 2022 a LADYJ COMPROMISE was publicly presented during a Roundtable meeting, and consensus dictated that both modifications met the objective to restore as many environments as reasonable to pre-NextGen conditions. Both options were presented to the OSG for assessment.

Community Outreach

Community Outreach - 2021

- **Malibu Council members** (phone + email; and Steven Taber - Malibu counsel: email + phone; and Rick Mullen: phone + text)
- **Hidden Hills Council members** - email + public meeting
- **Calabasas Council members** - email + phone + public meeting
- **CD-3: Bob Blumenfield** - covers both Historical + LADYJ: email + phone + in-person meeting
- **CD-12: John Lee** - covers both Historical + LADYJ routes: email + phone + in-person meeting with District Director, Eric Moody
- **Multiple Valley Periodicals - Valley News Group** covers both Historical + LADYJ territory - by CD3
- **NextDoor** - ongoing posts, including maps
- **FaceBook Community Pages in CD3 + 12** - multiple posts + maps
- **QSWH FaceBook Community Page** - ongoing posts + maps
- **Neighborhood Council notifications: Canoga Park, Woodland Hills (District 3) + Chatsworth, West Hills (District 12)** - email notices & updates + Facebook posts where available
- **Public Meetings (other)** - LAX Noise Round Table discussion and vote to take action on the LADYJ SID - 9/15/2021.



Community Outreach - 2022

- **Malibu's Legal Council** - Steven Taber - follows QuietSkiesWH's Community Facebook page + phone conversation with modification's author about LADYJ + his filed "Petition for Rule Making" in response to the IRNMN route.
- **Malibu City Council Clerk** - additional email notice of upcoming public meetings & update of continuing Roundtable/Community efforts to restore historical tracks of CASTA.
- **Hidden Hills City** - ongoing emails & updates + notice of meeting with District 27's State Senator on topic.
- **Calabasas Council members** - ongoing emails & updates + notice of meeting with District 27's State Senator on topic.
- **CD-3: Bob Blumenfield** - covers both Historical + LADYJ: email updates provided
- **CD-12: John Lee** - covers both Historical + LADYJ routes: email updates provided
- **NextDoor** - ongoing posts, including maps
- **FaceBook** Community Pages in CD3 + CD12 - ongoing posts + maps
- QSWH FaceBook Community Page - ongoing posts + maps
- **Neighborhood Councils:** Canoga Park, Woodland Hills (District 3) + Chatsworth, West Hills (District 12) - email notifications of upcoming meetings & updates, + Facebook posts where profile is available.
- **Public Meetings** (other) - LAX Noise Round Table discussion + vote to take action on LADYJ compromise - 03/16/2022 - Update: 07/20/2022.



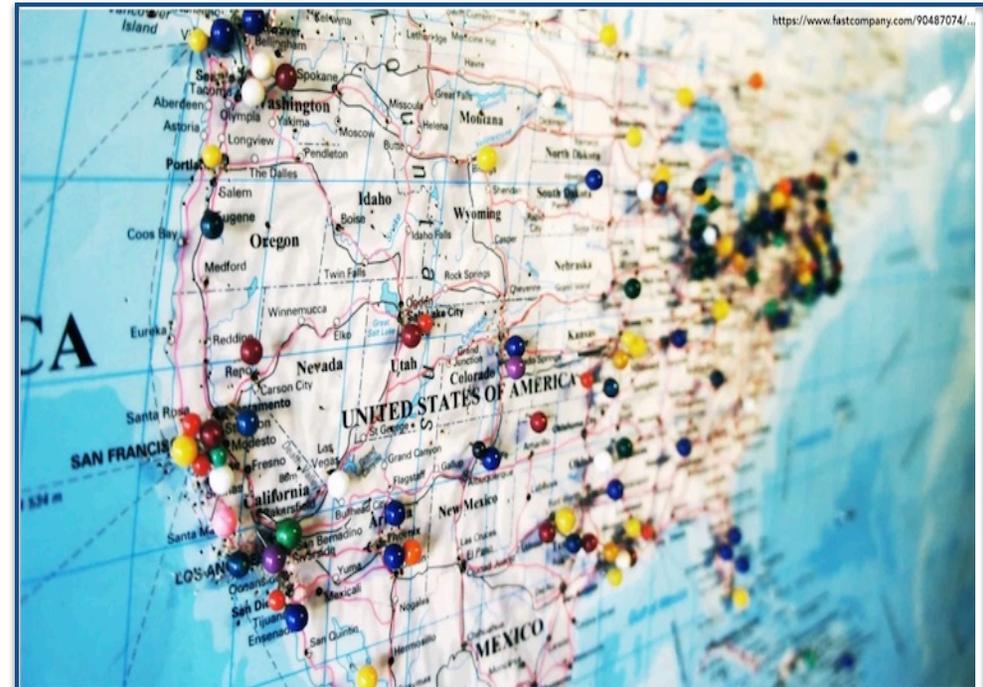
Community Impact

3rd Review Provided to Date

Review of FAA's Exposure Maps

FAA's Slide Clarification - Census

- During May's Roundtable meeting, the FAA shared its use of a "NextGen Assist" software that utilizes ACS (American Community Survey) data. ACS data is dependent on public honesty and participation (*IE: filling out invasive surveys*), a solicited demand that a significant number of the population denies their cooperation (**Newsweek reports that, on average, only 63% of the population participates. Of those, honesty and completeness of surveys is unknown.*) ACS data is by no means an accurate depiction of any given community - not in diversity or population numbers however, FAA's use of it is warranted and it is a tool to assist in population counts. With that stated, a "count" is not a factor when restoring historical conditions.
- By default ACS is intended to create a picture of diversity and disparity in population based on multiple variables however, that is not relevant to the LADYJ consideration as it *would be wrong* to apply racial and income bias when seeking justice for environments that were unlawfully or thoughtlessly altered by arbitrary and capricious federal action. The LAX Community Roundtable and the City of Los Angeles are both on record supporting the restoration of historical tracks where reasonable and feasible. Restoring all environments to pre-NextGen exposures, where possible, is the only fair action that does not put any one community's interest over another.



Census data can be pretty sensitive—it's not just how many people live in a neighborhood, a town, a state, or the nation as a whole. Every 10 years, the Census Bureau asks about people's ages, racial and ethnic backgrounds, personal relationships to others they live with, and more. It's information many people don't share with neighbors or coworkers, much less the federal government.

People who don't trust the Census Bureau to keep their data private and secure will be less likely to answer truthfully—or answer at all.

*Source: <https://www.newsweek.com/census-says-millions-americans-refusing-2020-surveys-not-being-counted-1527287>

SOURCE: <https://www.fastcompany.com/90487074/some-2020-census-data-may-be-unacceptably-wrong>

FAA's Slide Clarification - Discrepancy in Population

- In this slide, the population numbers produced by the software do not correlate with the image presented, as noted by the green text. The image suggests that the population count is for Malibu and parts of Calabasas however, the "current" vs "proposed" is not realistic considering documented impact on the current procedure and census records.
- While the CASTA Hybrid does historically impact more residents of Malibu, the LADYJ Compromise option does not - NOTE: *that option is not depicted on this slide.* Additionally the LADYJ impact on new Calabasas residents exceeds historical Malibu exposure, and that is not accurately reflected in this slide.

LADYJ and CASTA Hybrid Proposal

Summary of ACS Estimates	Current	Proposed
	2015 - 2019	2015 - 2019
Population	745	3,212
Population Density (per sq. mile)	116	591
People of Color Population	121	1,181
% People of Color Population	16%	37%
Households	241	456
Housing Units	319	592
Housing Units Built Before 1950	74	95
Per Capita Income	106,996	89,991

Since the population estimate is wrong, the rest of the statistics are inaccurate. Also, it is irrelevant because we shall not apply bias considerations.

Does not reflect highlighted areas in this image.

There's over 3k of Calabasas residents alone impacted in this area on the current LADYJ.

Relocation of LADYJ Request

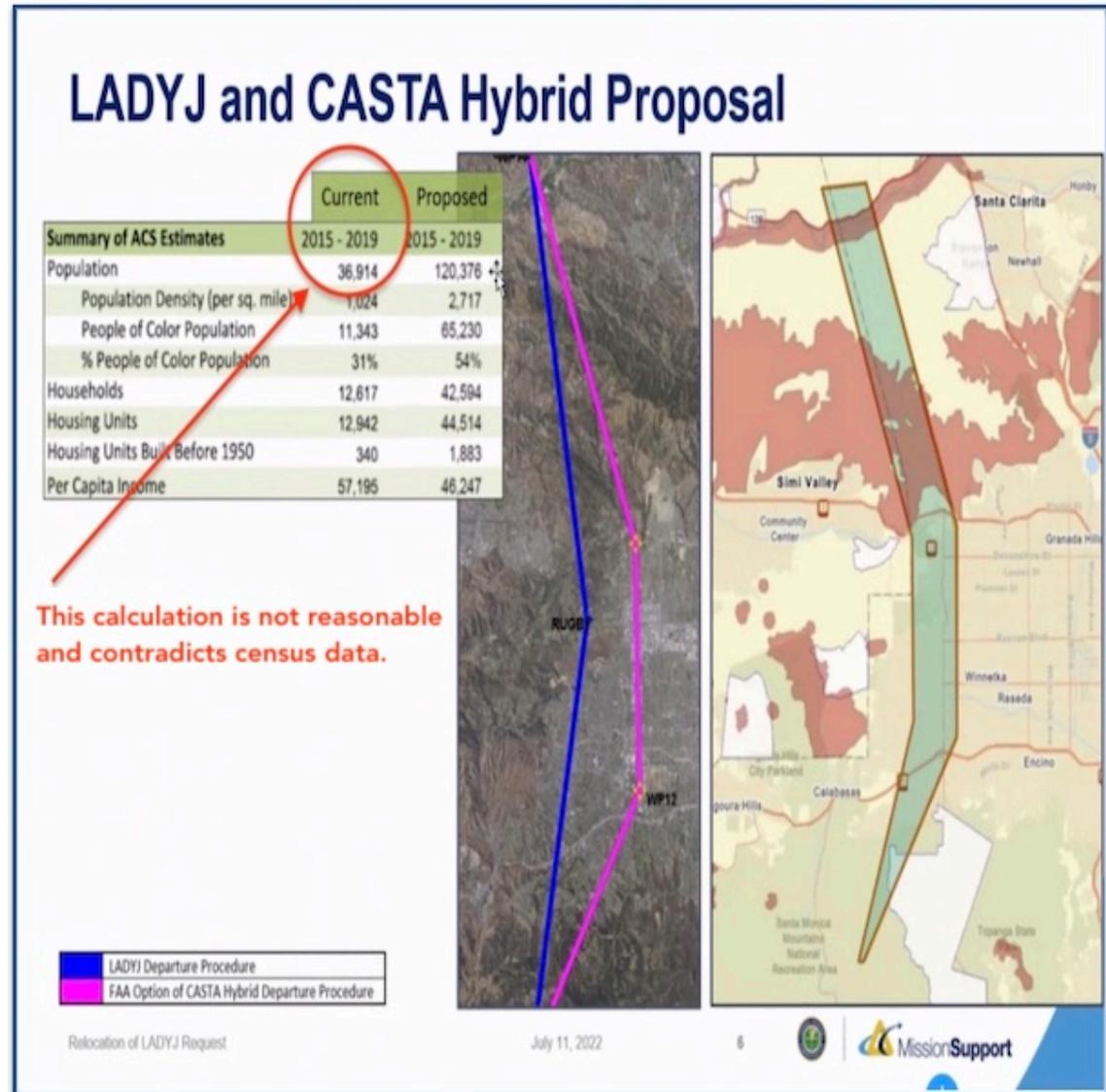
July 11, 2022

4

MissionSupport

FAA's Slide Clarification, con't

- While the OSG is required to factor in population data for modification assessments, the FAA failed to take this action when designing NextGen routes. More importantly, the software has produced estimates that are unrealistic to census data and documented community impact from the LADYJ SID.
- One slide (not shown here) provided a statistic that suggested the historical CASTA impacted approx 27k more residents than LADYJ's exposure. However, Slide #6 (shown here), depicts the same highlighted area and yet suggests there is an 83,462 population difference. Both these suggestions contradict our CA.gov census data, which suggests the results are off dramatically.
- It is simply wrong to suggest that LADYJ only exposes 36,914 residents to the new traffic. The LADYJ blindsided six (6) new communities, spanning four (4) Districts. Census data did not support this analysis upon review.
- Slide #14 demonstrates negligible population differences between CASTA and LADYJ exposures.



Defined Exposure Maps

2018-2020 Census Data

Exposures South of 101 freeway

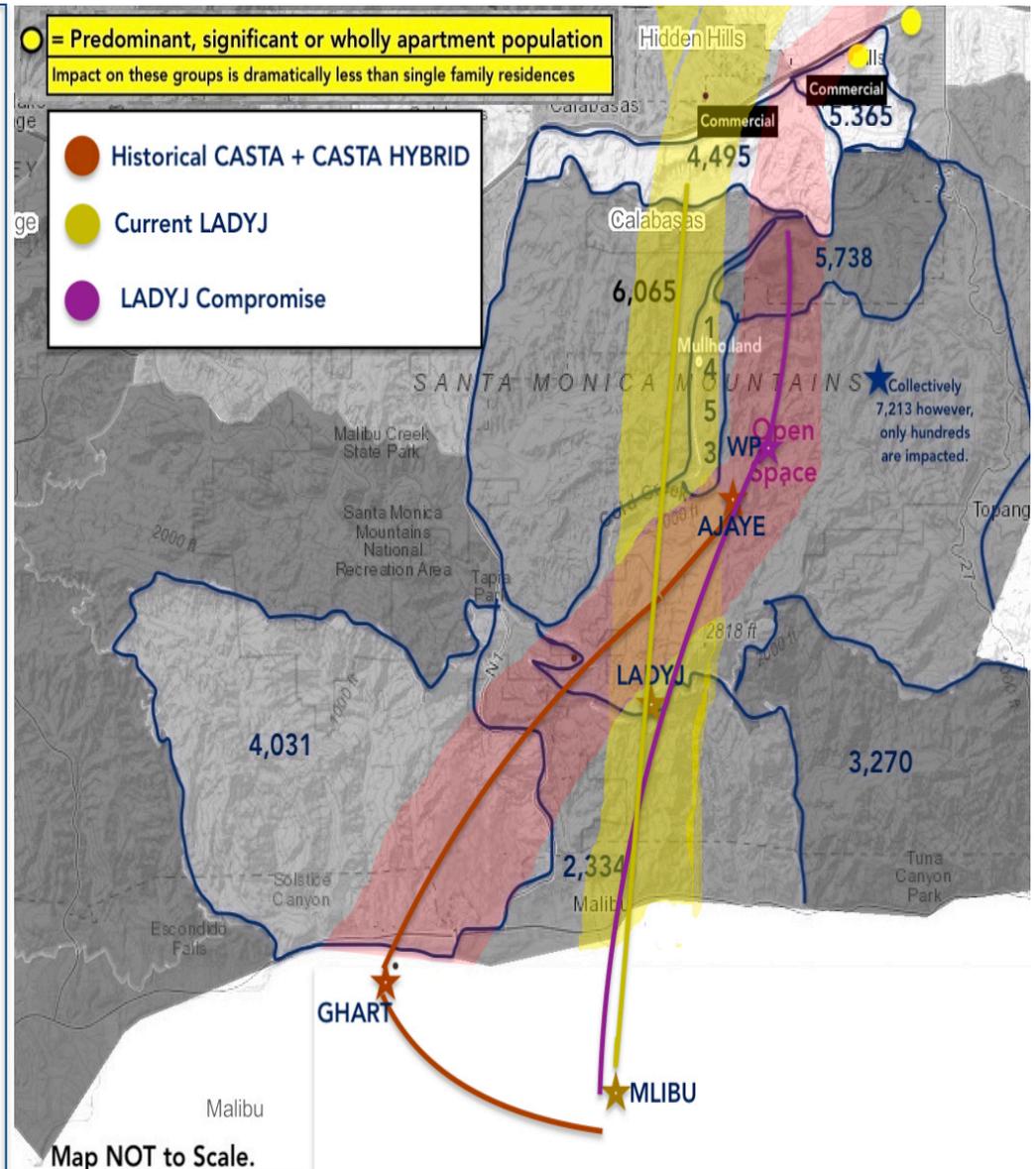
MALIBU: The historical CASTA SID exposure does include more Malibu residents than the LADYJ however, the population count is thousands *less* than the new exposure from LADYJ of blindsided residents in Calabasas, *which doesn't even include thousands more in Hidden Hills.*

In contrast, the LADYJ Compromise option is designed to retain current population exposures in Malibu.

CALABASAS: There is a longer stretch of unoccupied airspace under the CASTA SID than the current LADYJ. Restoring historical exposures spares thousands of unjustly impacted households from the LADYJ waypoint to the 101 freeway.

Roughly 1,453 residents are in a precarious location. LADYJ is approximately one (1) mile west of two HOAs, and the historical CASTA is approximately one (1) mile east. Members of these communities stated that they were not notably impacted by the historical route and as such, support restoring historical tracks.

POPULATION: Census track boundaries south of the 101 freeway span significant miles of distance considering these areas are scarcely populated, in comparison to most areas in Los Angeles, which is due to large property lots and/or natural space in-between the homes. Not all residences in a boundary track will be impacted by the defined routes and so, to quote census track data would be misleading.



Map is best estimate

Exposures North of 101 freeway

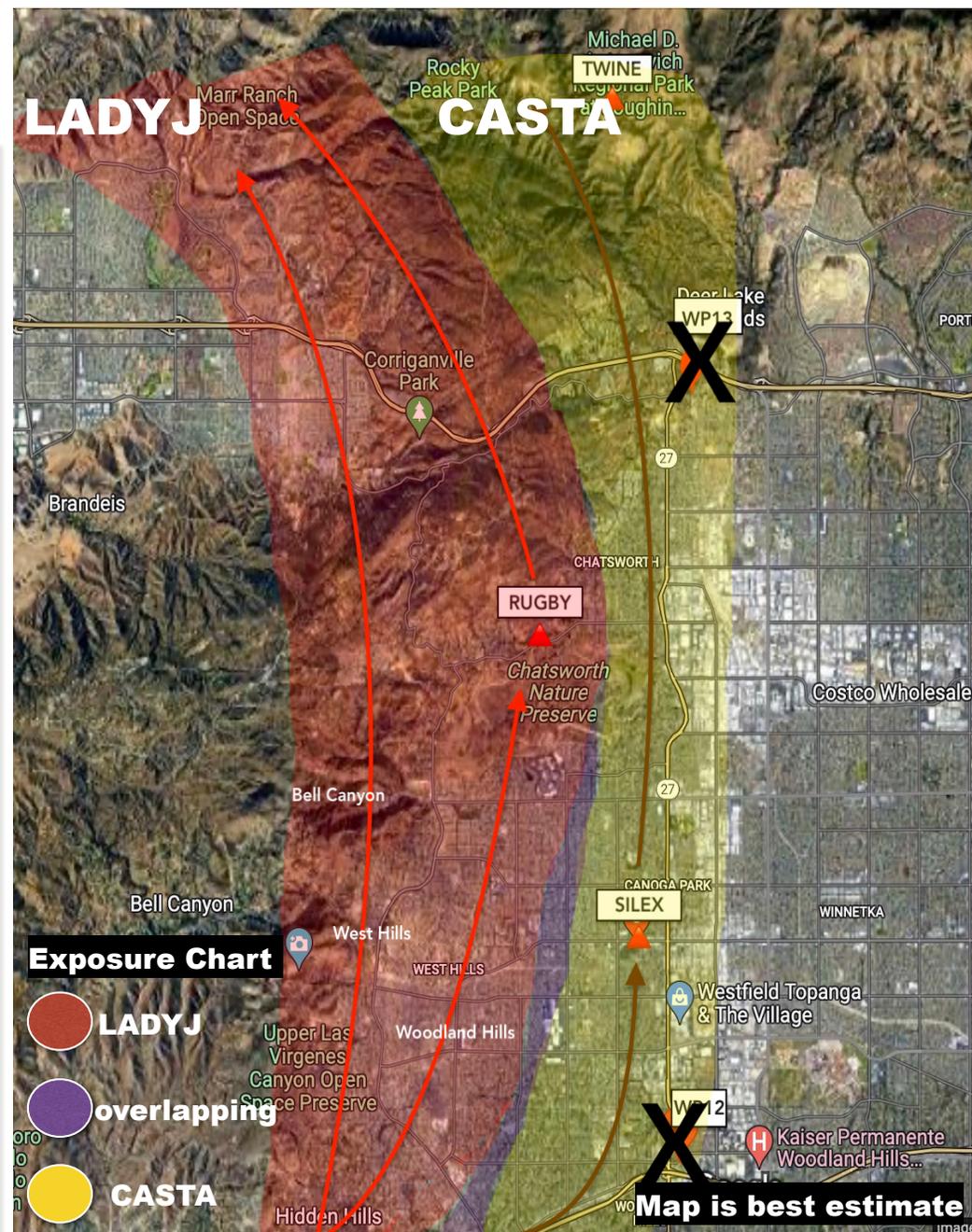
QUESTION: Why is the LADYJ exposure so much wider than CASTA?

ANSWER: First, the image is deceptive in that when zoomed out for full view, placement of community identities shifted slightly on the map so coloring was shifted to "grab" those communities. Impact zones are at least 1 NM circumference of flight track. The "shifting" of community identities is a flaw of Google Maps.

Second, using current ADS-B data and documented community complaint, we accurately pinpointed exposure areas of LADYJ. FAA imagery and limited ADS-B data was used to depict mass CASTA impact. Additionally, LADYJ only has one waypoint (RUGBY) guiding the planes. This has proven to encourage pilots to drift away from the single target and head for OROSZ, which is north west of RUGBY and TWINE. Regardless of whether the aircraft is on the West Fork or the East Fork of LADYJ, the noise impact is heard throughout the red zone due to the mountain terrain reverberating and trapping the sound. Residents in the red zone reported to having no notable impact when aircraft was on the historical route.

Third, CASTA has two waypoints guiding aircraft (SILEX + TWINE) which can act to encourage pilots from violating excessive communities however, on this route aircraft does tend to drift west - even historically - and may overlap as the purple section depicts. As such, we counted applicable "overlapping" communities in both population estimates.

13



Population Estimate North of 101 freeway

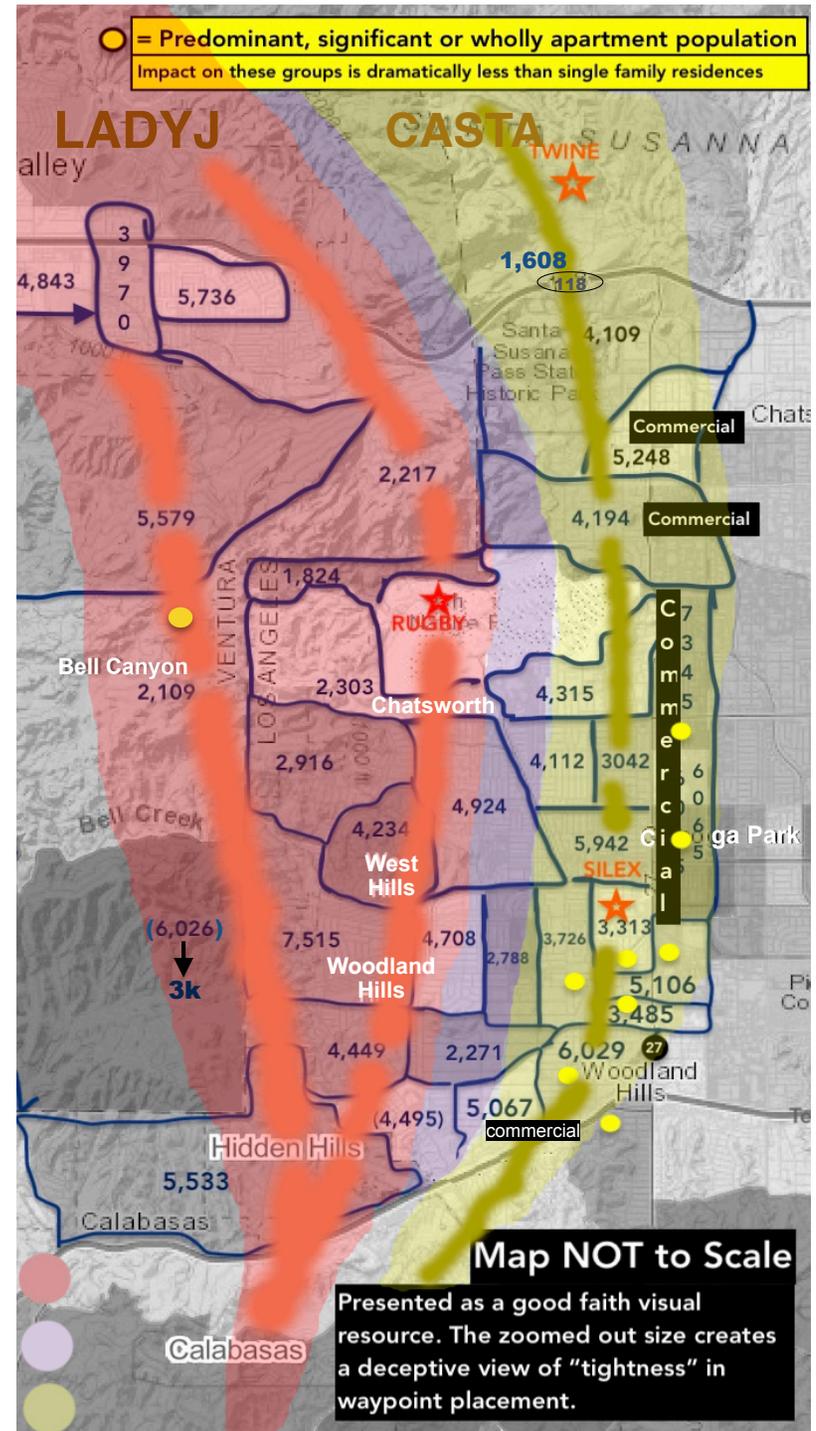
Source: CA.GOV - Updated October 2021

LADYJ - North of 101: approx 72,652

CASTA - North of 101: approx 77,157 - *78,765
*Including: 1,608 north of 118 FWY

While impacted population numbers north of the 101 freeway may reflect a negligible increase on the historical CASTA track (approx 4,500 residents), the reported impact decreases per scientific variables and ¹documented records.

¹Lack of documented complaint from any community and/or its residents along CASTA's tracks over the course of its existence is record of "insignificant impact".



It's Time to Right the Wrong

FAA's own research and acknowledgments agree

“Conflict” did not exist below 10k ft

In addition to the dramatic consequences, argument to Right this Wrong includes that there was no conflict or need for change south of OROSZ.

The reason CASTA was modified for Metroplex was to take the opportunity to alleviate growing congestion around the AVE transition for LAX arrivals. This has nothing to do with the historical traffic off the runway and traveling through the SILEX and TWINE intersections.



FAA’s own internal policy is reportedly to NOT impact **new** communities below 10,000 ft unless absolutely unavoidable. LADYJ’s implementation completely ignored that policy that, otherwise, honors civil liberties, rights and the well-being of life on the ground - human and wildlife alike.

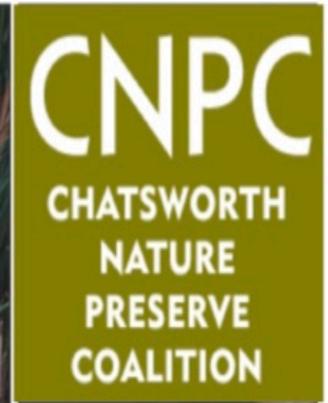
RUGBY violates a Seasonal Wetland

D.O.T. Section 4(f): In addition to dramatically altering the home environments of NEW communities, the waypoint RUGBY was placed in the airspace of a **Seasonal Wetland** (Chatsworth Nature Preserve and Reservoir). Considering the FAA had a viable alternative that met the needs of Metroplex and would not require encroaching this protected airspace or violating new communities, *as demonstrated by both modification options*, LADYJ should have never been implemented at all. This warrants 4(f) Process (and NEPA) concerns that dictate a “no alternative” scenario must be proven to justify encroaching (otherwise) protected spaces, such as wetlands.

(FAA) Rachel Girvin’s own research Agrees - LADYJ impacts were unjust: Rachel Girvin’s 2006 paper and 2008 NoiseCon presentation (see next slide) acknowledge that the FAA did not have the proper baselines to assess the environmental impacts of erecting new routes and increasing traffic over natural spaces and adjacent communities such as the ones the LADYJ violates. Nothing notable changed in FAA’s research leading up to LADYJ’s implementation. FAA’s admitted “*gaps in knowledge*” about noise disturbance “*below the 65 dBA DNL*” warranted preserving the historical tracks south of OROSZ on CASTA8.

BACKGROUND

The Chatsworth Nature Preserve (CNP) is a major City of Los Angeles open space preserve teeming with wildlife. More than 200 species of **Birds** are on site including, *Residents:* Greater Roadrunner, California Quail, woodpeckers, herons and egrets; *Migrants:* Canada Goose, Western Meadowlark, Tricolored Blackbird, and sapsuckers as well as a variety of ducks and shorebirds; *Raptors:* Ferruginous Hawk, Red-tailed Hawk, Prairie Falcon, Long-eared Owl, and many others. There are notable **Amphibians and Reptiles:** western spadefoot toad, slender salamander, western skink, ring-necked snake, red racer and much more. The fauna includes large and small **Mammals:** desert cottontail rabbit, gray fox, coyote, raccoon, and occasional visits of bobcat, cougar and mule deer. **Habitats** include oak woodlands and savanna, riparian areas, chaparral, grassland, and an Ecology Pond. The seasonal wetlands, and vernal pools, as well as portions of the grasslands and riparian areas are now under threat by a poorly conceived modification project. - RUGBY violates a Seasonal Wetland -



Ringed neck snake, great egret, black headed snake.

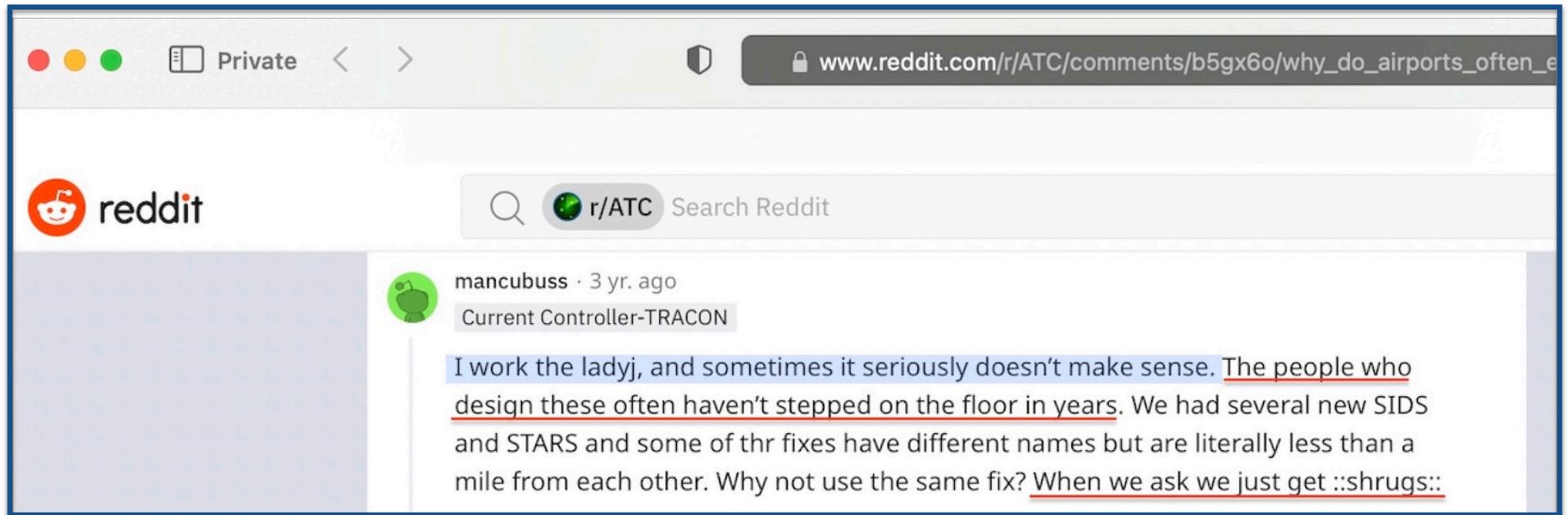
Rachel Girvin's acknowledgments SUPPORT restoring CASTA tracks:

- Rachel's 2006 paper "Advancing Aircraft Noise Impacts Research: A White Paper" clearly acknowledges that the FAA was fully aware of gaps in research in respect to naturally quiet areas such as parks and wilderness. This gap spills over into the communities that butt up against wildlife areas/preserves, such as those now impacted by the LADYJ. Rachel states in reference to these natural environments: "**The significance of impacts** at noise exposure levels **below** 65 dBA DNL **remains to be determined** both for visitors (we add: residents) and wildlife."
- The (now inactive) FAA Administrator continues: "...there is also concern ... about increases in lower level noise as **high altitude air traffic increases** in quantity over these areas." Again, this is relevant to the communities under the LADYJ that are established near and against QUIET wildlife preserves and parks/trails. **None of these known factors were adequately considered before the ill-fated replacement of CASTA.**
- Rachel Girvin herself, while employed by the FAA in the Environmental and Energy Dept, presented a 2008 paper, Noise-Con 2008, that acknowledged the FAA's recognition that "environmental policies may require updating" to "better reflect changes in ... the current state of knowledge". She again admits that the FAA has "knowledge gaps in our understanding of noise impacts" and yet, the FAA still moved forward with impacting NEW communities at altitudes as significantly low as 10k ft AGL and under.
- The OSG has acknowledged that the proposed modification(s) are technically feasible. Once again, we request that the Western Pacific Administrator's office remove imposed obstacles and honor the **FAA's spoken commitment to Congress** by cooperating with communities in reasonable resolve to achieve safety - both in the air AND on the ground. **It is time to Right this Wrong and allow OSG to do its work uninterrupted and without bias influence.**

LADYJ creates burden that CASTA mitigates

- North of the 101 freeway, mountain terrain amplifies impact of the LADYJ and prolongs the disturbance on communities in the Valley below. Contrary, CASTA's open airspace allows noise to dissipate faster, helping to lesson impact on the surface.
- While the surface below the LADYJ houses 99% single-family homes, the CASTA route includes a significant percentage of commercial land use. The commercial areas create their own noise, which can serve to mask impact. Contrary, the surfaces below the LADYJ are void of high-traffic areas and commercial influence, and include wildlife space nestled among the residences. This quieter ambience creates a more dramatic contrast between the homes and natural spaces in the vicinity vs the new air traffic disturbances that resulted from the LADYJ.
- CASTA's airspace also includes 10's of thousands of apartment dwellers. Impact on apartment lifestyle is significantly less than on single-family homes. (1) The construction is different in standard, most especially for the high number of homes built in the 1960's where upgrades are not within financial means. (2) Homeowners have financial ties to single-family properties and those under the LADYJ purchased their property at values that reflected the LACK of air traffic presence. The arbitrary and capricious replacement of CASTA has created financial burden and/or fear for those reliant on the equity of their property for retirement survival. (3) West Hills and Woodland Hills have significant households with multi-generations sharing a small dwelling. This makes their outdoor space vital for the mental, emotional and physical well-being of many residents who invested their life savings into QUIET communities away from known nuisances that cause the vulnerable anguish. (4) Many residents sought QUIET neighborhoods out of medical necessity for illnesses (mental and physical) that they are suffering. The arbitrary placement of a new air traffic route is accused of putting the health and well-being of victims in peril.
- Communities took no documented issue with the CASTA SID and NO complaints were presented as being recorded during the route's entire existence. The lack of protest and interest dictates that there was no notable impact.
- Contrary, LADYJ victims' have documented notable impact from the surprise attack, and suffered violations of fundamental and NEPA rights when their home environments were dramatically altered without warning and inarguable justification.

What is ATC's view? Here's one:



- Logically we do see the benefit of the LADYJ from an airline perspective HOWEVER, the **dramatic consequences** of this shortcut do not justify any benefit whether exaggerated, perceived or real.
- The community has presented the FAA an opportunity to Right the Wrong and reverse the unjust detriment that blindsided 10's of thousands of residents by dramatically altering their environments.
- Listening to the outcries of LADYJ's unsuspecting victims by restoring environments to their pre-NextGen exposures is a **noble example of "Environmental Justice"**.

Political 🤔 Rhetoric - Not a Consideration

Political rhetoric is often spewed for self-serving purposes
Political rhetoric is often used to “straddle the fence”.
Political rhetoric often attacks warranted, fair and moral action.

Political Rhetoric is also plagued by selective or manipulated “facts” - IE: lumping multiple minorities (Lebanese, Arab, Persian, etc) into a general “white” category. Moreover, there is no viable “environmental justice” rights for communities benefitting from ill-gotten gains. Government officials are charged with treating ALL people equally, and charged to make decisions on the basis of merit rather than race, gender, or other personal characteristics. To deny LADYJ victims the restoration of CASTA tracks under 10k ft AGL would be immoral, a prejudicial denial of their rights and a double-standard that contradicts Los Angeles City’s precedent of action in effort to restore historical tracks in other communities.

**Restoring HISTORICAL exposures
is Environmental Justice.**

www.census.gov/quickfacts/losangelescountycalifornia	
All Topics	Los Angeles County, California
Population Estimates, July 1 2021, (V2021)	9,829,544
PEOPLE	
Population	
Population Estimates, July 1 2021, (V2021)	9,829,544
Population estimates base, April 1, 2020, (V2021)	10,014,009
Population, percent change - April 1, 2020 (estimates base) to July 1, 2021, (V2021)	-1.8%
Population, Census, April 1, 2020	10,014,009
Population, Census, April 1, 2010	9,818,605
Race and Hispanic Origin	
Total = 100.9% 🤔	
Black or African American alone, percent (a)	9.0%
American Indian and Alaska Native alone, percent (a)	1.5%
Asian alone, percent (a)	15.6%
Native Hawaiian and Other Pacific Islander alone, percent (a)	0.4%
Two or More Races, percent	3.3%
"over-lap" - double counting category	
Hispanic or Latino, percent (b)	49.1%
White alone, not Hispanic or Latino, percent	25.3%

SUMMARY

- FAA's own documentation confirms that there was no reason to deviate from historical tracks south of the OROSZ waypoint.
- The Roundtable submitted a complete procedure modification that met FAA criteria to Tamara Swann, FAA (Administrator Director) on September 27, 2021.
- The Roundtable's LADYJ objective meets the same goal as the VNY modification, which LAWA submitted through the IFP gateway in the fall of 2021. Both of these departure modifications share the same objective which is to restore historical exposures on the departure routes.
- We followed FAA protocol and the Roundtable's request was properly submitted through the IFP gateway on January 4, 2022.
- Finally, the FAA has already found the CASTA HYBRID technically feasible, and the LADYJ Compromise is also in their consideration so, there is no reasonable argument to not move forward now to *Right this Wrong*. Prompt action is to the benefit of all communities that do not deserve to sit in limbo on either side.

Any Questions?

