



City Council

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John B. Roberts
Council Member

Jesus "Jesse" Sandoval
Council Member

Phillip W. Cothran
Council Member

November 19, 2020

Ms. Raquel Girvin
Regional Administrator, AWP-1
FAA Western-Pacific Region
777 South Aviation Boulevard, Suite 150
El Segundo, CA 90245
Via email: raquel.girvin@faa.gov

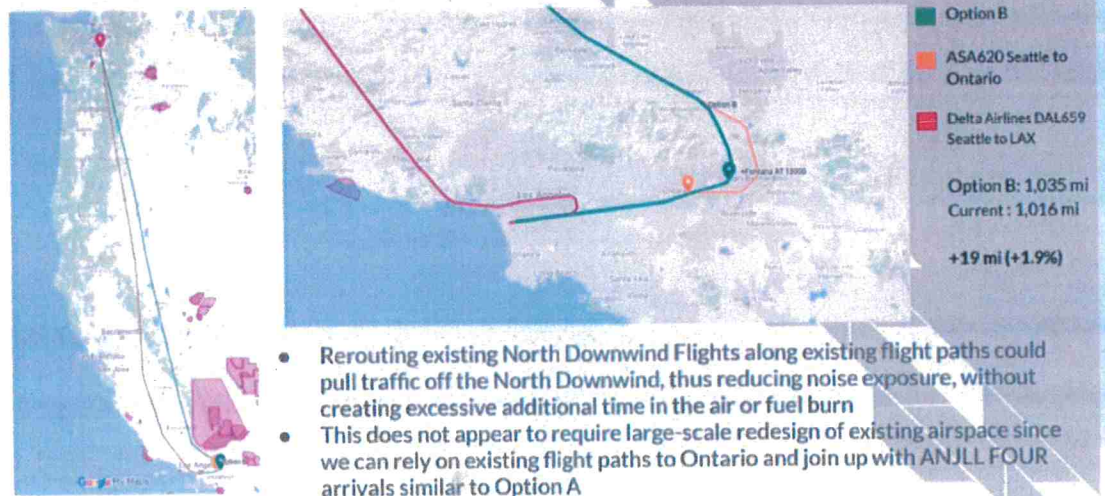
Subject: Concerns over Proposed Rerouting of LAX Traffic Over Western San Bernardino County

Dear Ms. Girvin:

This presents our comments and concerns regarding the proposal presented at the March, July and September 2020 meetings of the LAX Community Noise Roundtable for revised routing of north downwind arrivals to Los Angeles International Airport. Three alternative flight path proposals, Options A, B and C, were initially presented by the community group Quiet Skies LA. The group is now requesting that their preferred proposal, Option B, be supported by the LAWA Roundtable for presentation to the FAA for consideration.

The proposed Option B arrival is depicted graphically below in green in a slide from presentations provided at the Roundtable meetings. This routing would replace those using the current procedures (in red) over Malibu, Santa Monica, and Los Angeles before reversing course for final approach to Los Angeles International Airport (LAX).

6. Option B, Proposed Route Example



The proposed Option B would be used by southbound arrivals currently using the HUULL TWO or IRNMN arrival procedures. This procedure would bring new flights per day over our communities to the west as they approach LAX. Flights would intersect the LAX instrument approach at about 11,000 feet over the region. This would adversely affect our communities with increased air pollution, more noise, air traffic delays, and safety impacts. Following are specific issues with the Option B proposal.

- More than 300 LAX arrivals (36 percent of all LAX arrivals) would be routed over the region disruption air traffic to and from Ontario International Airport and other local airports, while diminishing air safety by increasing air traffic congestion and controller workload.
- The proposal would increase noise and air pollution (CO2 tonnage) by extending and prolonging flights over the LA Basin.
- The proposal would unnecessarily prolong flight times, delay arrivals, and waste fuel. The extent of delays from the proposal is substantially understated.
- The proposal would further economically burden the airlines and passengers by increasing costs at a time of extreme economic challenge for the airlines and flying public.

For these reasons, we respectfully request that you disapprove of the proposal for New North Downwind Arrival Flight Paths to LAX. The claim of an environmental benefit from the new route is false. Obviously, there is an air quality detriment from extending the length and duration of the approach path, and no real noise benefit by distributing the noise over a much larger area. While it is preferable to reject this proposal directly, at the very least an environmental assessment of air quality and noise impacts is warranted by modeling with the FAA's Aviation Environmental Design Tool (AEDT).

Thank you for your consideration of our concerns over this proposal.

Sincerely,



Mark Denny, City Manager

cc: **Dennis J. Schneider, Chair**
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