



March 30, 2022

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

RE: Continuation of LADYJ proposal review to reduce noise on communities

Dear Ms. Girvin:

Thank you again for FAA participation in our March 16th LAX/Community Noise Roundtable meeting. We appreciate the FAA's engagement with us toward expeditious proposal review with the objective of reducing noise on those communities below current flight paths to and from LAX.

In our Roundtable meeting, we accepted for FAA consideration another option that offers an alternative route in addition to the originally-proposed route for the LADYJ modification proposal. We believe this proposal deserves thorough consideration from FAA subject matter experts tasked with designing and maintaining flight paths and procedures within the SoCal Metroplex area. The updated proposal represents a good faith effort by the Roundtable to address the intensity and distribution of aircraft noise within our region.

This alternative modifies only the segment of the LADYJ SID that starts from the LADYJ waypoint and ends at the OROSZ waypoint, affording a savings of 2 miles from the original proposal, and reverts that segment back to the CASTA departure route as shown on page 9 of the attached proposal presentation. The rest of the LADYJ procedure would remain as it currently exists today – from runways to the LADYJ waypoint, and north of the OROSZ waypoint. This flight procedure modification is a compromise for FAA's consideration in the interest of maintaining the air travel efficiency of the current route while providing noise relief for residential communities in the San Fernando Valley that were not exposed to the LAX departure traffic prior to the LADYJ's implementation. This change should provide noise reduction for those affected communities.

The terrain maps within the attached presentation made in our public forum identify affected communities under either option and are posted for public outreach concerns and interest. The Roundtable reached consensus for both options and we anticipate that the FAA will move forward with its standard protocol for assessment without need for delay or pauses in-between departments during your regular process.

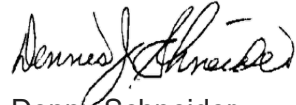
We understand that a preliminary assessment of this proposal is targeted to be completed by July 2022. We want the best option for implementation as rapidly as possible, and would like to thank the FAA for agreeing to continue evaluating this alternative LADYJ option as recently accepted by our Roundtable along with the original proposal submitted via Roundtable letter on September 27, 2021, and subsequently submitted via the IFP Gateway in January 2022 by a Roundtable member (IFP confirmation #B983B330E3074D3FA4E69F0429B00722).

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We look forward to engaging more fully with you and your organization about this proposal and would also request that FAA provide a presentation at our next meeting covering the process and timeline in detail regarding how Roundtable proposed changes to flight procedures are handled.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Denny Schneider", written over a horizontal line.

Denny Schneider
Chair, LAX/Community Noise Roundtable

Attachment: Updated LADYJ Modification Proposal

CC: OSG IFP Portal Correspondences, <9-AWA-IFP-WesternServiceCenter@FAA.gov>
Clark Desing, Director, ATO Support Group Western Service Center

Predicting an FAA compromise
LADYJ FIVE (compromise) VS CASTA HYBRID (desired)



PREDICTING A POSSIBLE COMPROMISE

Quick History: The LADYJ modification proposal followed the same goal as the BUR departure modification efforts, as well as the approved VNY departure modification, *which is slated for a 2024 implementation*. That shared goal is to justly revert air traffic back to its historical tracks, as practical.

Previous Action: The original LAX LADYJ4 SID modification had two options. Option 1, the CASTA HYBRID, was presented to the public, considered by the Roundtable and, upon consensus, sent to the FAA for assessment and consideration on Sept 29, 2021.

Current Action: Option 2 was reserved as a likely compromise should the FAA not be agreeable to extend the ocean track back to its original profile, which adds 2 miles to the current LADYJ4 SID over the ocean. Such a proposed compromise is referred to as the LADYJ FIVE option, and it too was released for public consumption in the summer of 2021 by means of social media outlets and a designated website. Today's presentation provides a detailed explanation of what the LADYJ FIVE compromise will look like, allows further opportunity for public comment, and affords the Roundtable the benefit of preventing unnecessary delay by reaching a consensus that would allow the FAA to move forward to the next phase (operations) in their assessment of the CASTA HYBRID / LADYJ FIVE compromise.

Community Interest

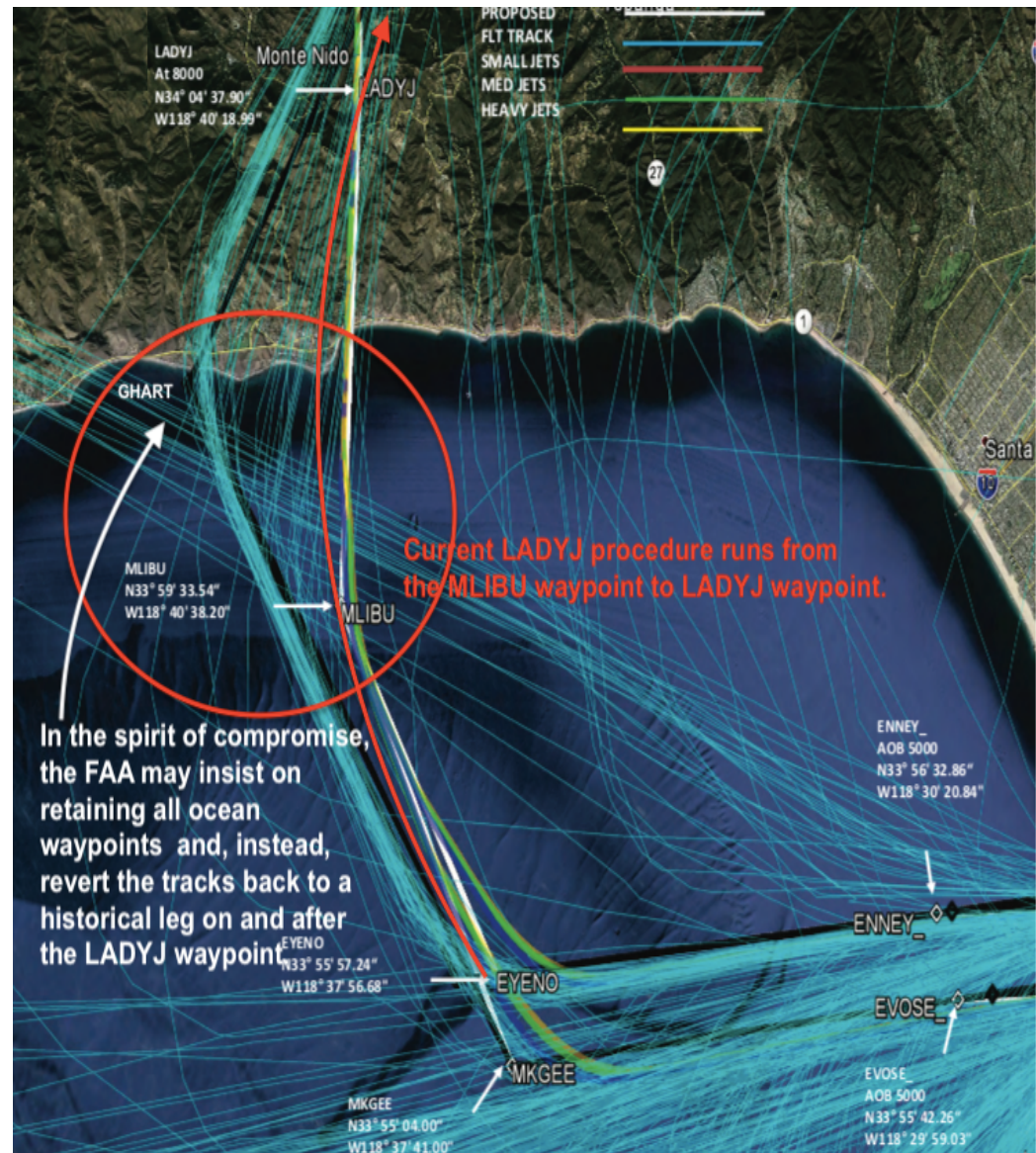
Where would the compromise occur?

The compromise would occur over the water.

Instead of restoring the GHART waypoint, a compromise provides opportunity to retain all existing ocean waypoints (see MLIBU in image) whereas, the air traffic would revert back to historical tracks off the LADYJ waypoint.

Why would the FAA want or suggest this compromise?

Because it would eliminate a proposed increase of nearly 2 NM to the route, an increase that would honor historical tracks 100% over the water, but is not an operational requirement.

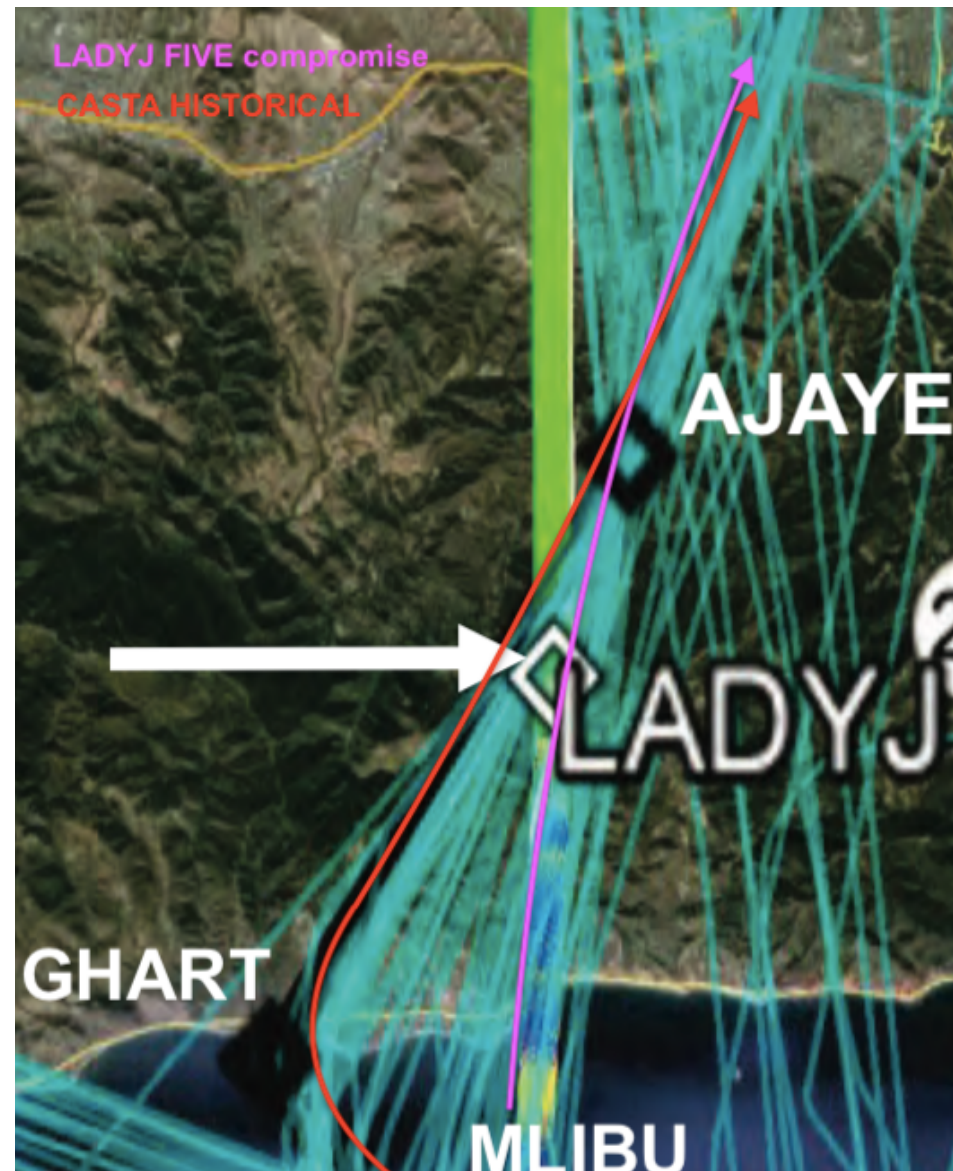


Would the impact on community differ from the CASTA HYRBID?

The waypoints associated with the predicted FAA compromise effect the airspace of Malibu's shoreline and Calabasas.

MALIBU: If all existing waypoints are retained in the ocean, then there is no change or impact to Malibu that differs from current exposures; Contrary, the CASTA HYBRID would restore tracks over a westerly stretch of Malibu.

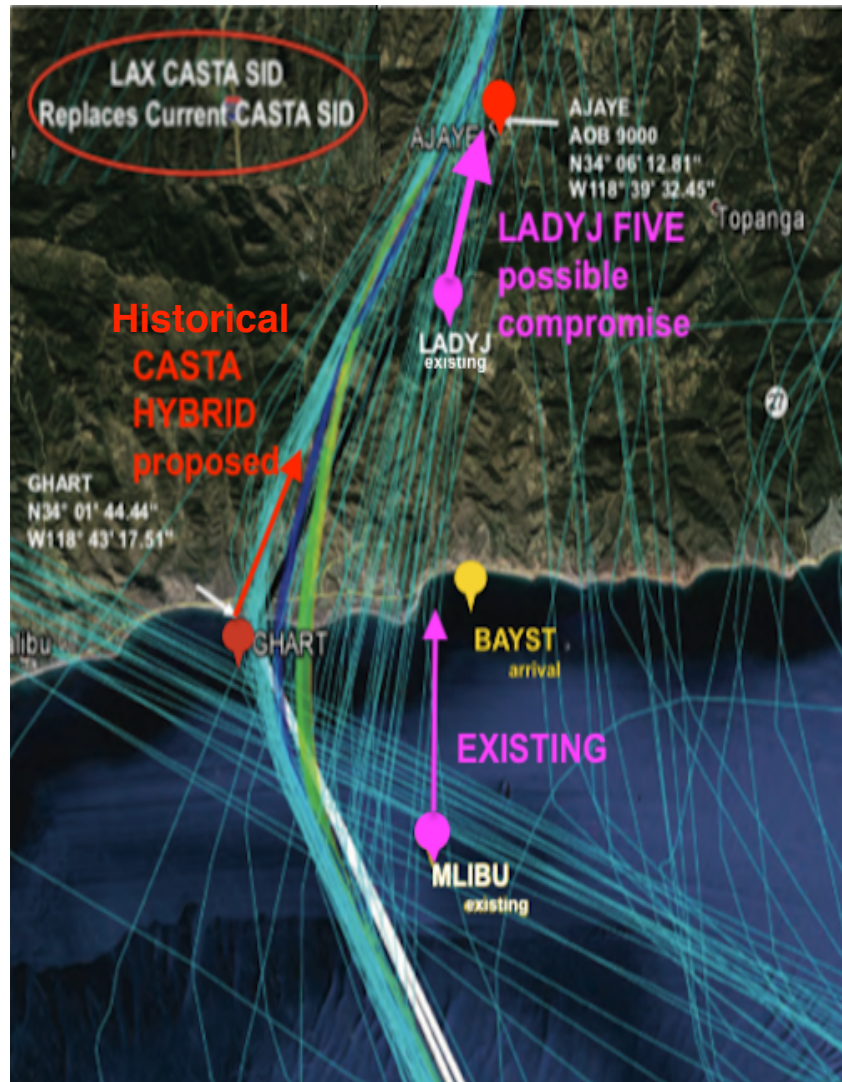
CALABASAS: Should the FAA offer the LADYJ FIVE option as a via media, Calabasas is shown to incur no change from the historical exposures (see image). While the trajectory from GHART to AJAYE differs from the trajectory from MLIBU to LADYJ - AJAYE, that difference has proven inconsequential in reference to noise impact exposures (see slide 6). The flyovers from actual flight tracks show within 660 feet (slide 6), depicting the exposures are negligible. The procedure chart options (slide 9) depict an approx 009° header from LADYJ -> SILEX and a 004° from AJAYE -> SILEX (historical). Adjustments in waypoint location can be made to accommodate the difference to ensure a historical exposure but even untouched, the exposure remains in the same general airspace.



Actual (2021) flight track VS historical track VS projected tracks



CASTA HYBRID Proposed (historical) VS LADYJ FIVE option - FAA compromise



Historical tracks used for visual



CASTA HYBRID proposed

(historical - tracks ↓11k ft)

Track: white line -> pink line

VS

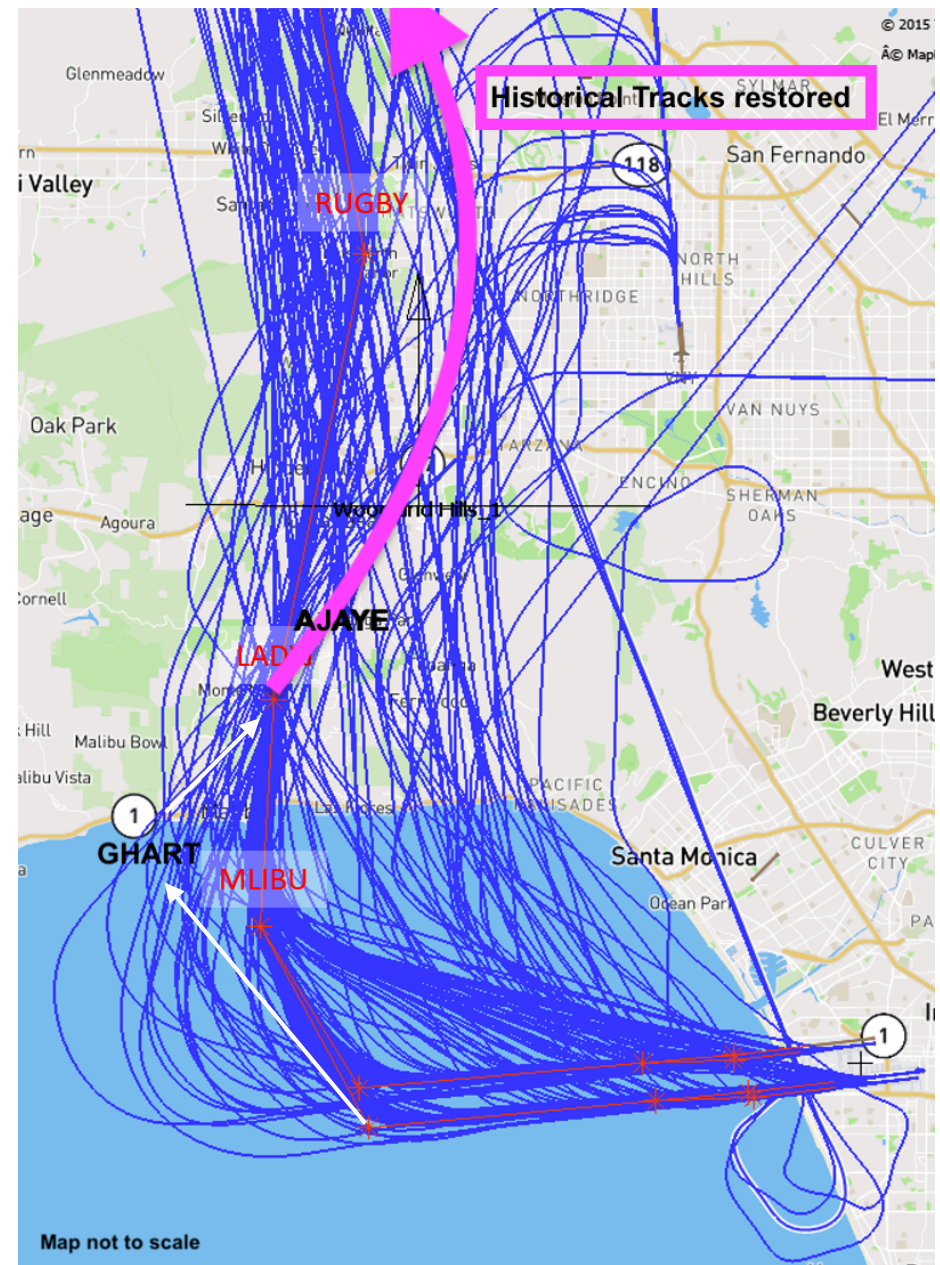
LADYJ FIVE option

(compromise)

Track: current (blue) -> historical pink line

2021 Flight Tracks shown

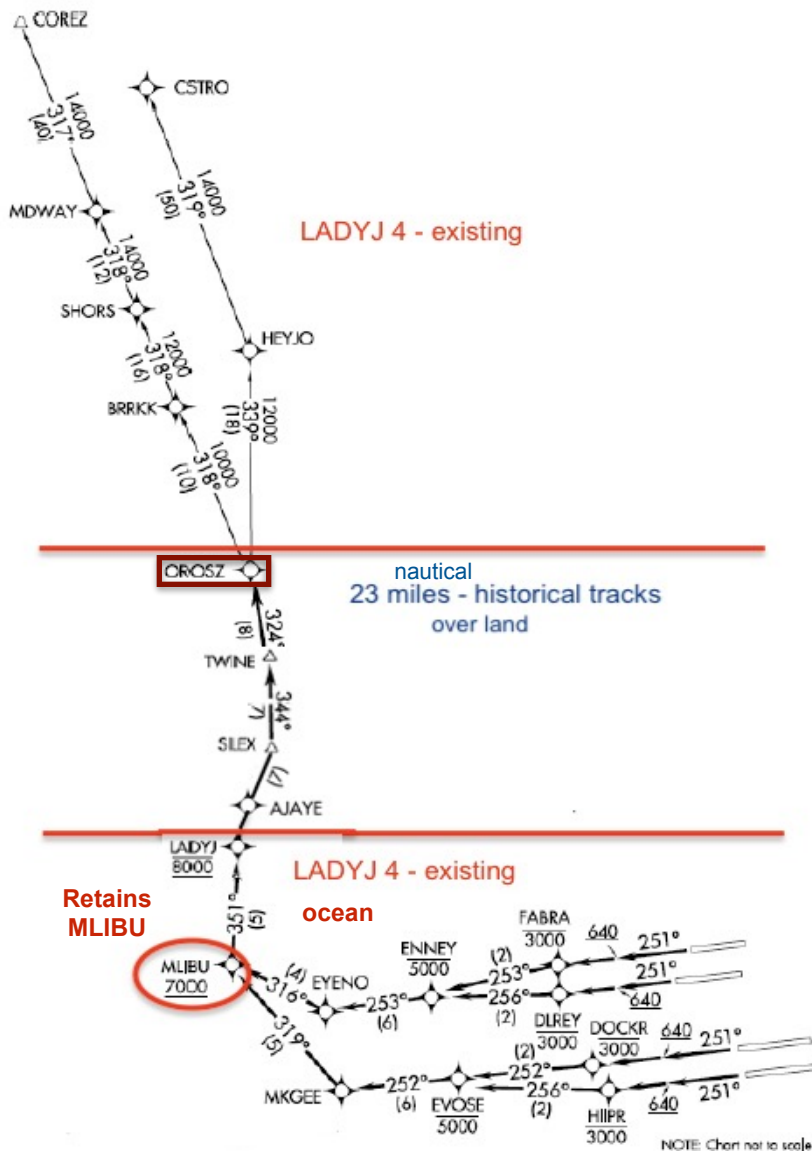
As depicted in the image, planes are currently flying a version of both the LADYJ FIVE option and the CASTA HYBRID.



Technical Data - Procedure Charts proposed

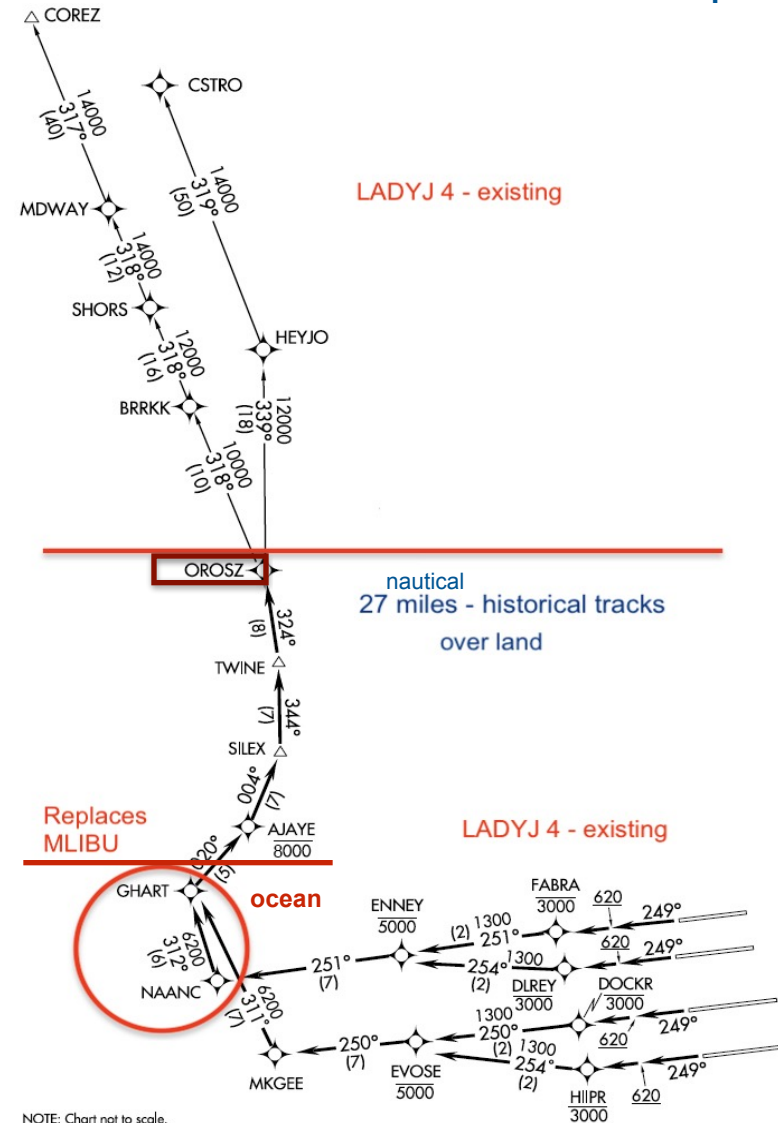
LADYJ FIVE option

FAA compromise



CASTA HYBRID

submitted modification request



Will this via media compromise the objective of the proposed CASTA HYBRID?

No, the compromise does not negate the objective. As noted on slides 4, 5, 7 and 8, the biggest difference between the CASTA HYBRID and the LADYJ FIVE option occurs over the water. The objective, to restore flight tracks over terrain under 11k ft AGL, remains in tact and viable.

- Each option restores home (and natural) environments that were dramatically altered, **without warning**, by the egregious replacement of the existing and environmentally adapted westerly departure route.
- Each option corrects unjust impact that did not undergo NEPA's "EIS" and 4(f) evaluations, where applicable, in the new areas both north and south of the 101 fwy.
- While the CASTA HYBRID affords a 100% reversion to historical tracks under 11k ft AGL, the LADYJ FIVE compromise would spare a portion of Malibu from regaining the historical traffic, either way the objective is justly met and is designed to restore a stretch of historical tracks that prevents new communities from being subjected to exposure.

BOTTOM LINE

Communities across Los Angeles, *and the nation*, continue to seek relief by means of route modifications that better reflect historical tracks, and reduce the volume of unjust impact on new and/or additional areas.

While honorable goals are to mimic historical tracks precisely, such a goal is not practical in all incidences, or may not receive the FAA's cooperation. This reality has been demonstrated by the compromise made in the agreement to modify VNY departures.

Accordingly, if the FAA will not agree to the proposed CASTA HYBRID as submitted, the LADYJ FIVE option provides a fair compromise that is agreeable, and that should receive consensus as it meets the objective, actually reduces Malibu's historical exposure, and is a reasonable solution to restore tracks under 11,000 ft AGL.



Any Questions?

