

**AGENDA DESCRIPTION:**

Consideration and possible action to receive and file a status report on the City's participation on the LAX Community Noise Roundtable.

**RECOMMENDED COUNCIL ACTION:**

- (1) Receive and file a status report on the City's participation on the LAX Community Noise Roundtable.

**FISCAL IMPACT:** None

<b>Amount Budgeted:</b>	N/A
<b>Additional Appropriation:</b>	N/A
<b>Account Number(s):</b>	N/A

**ORIGINATED BY:** Robert Nemeth, Associate Planner *JA for RN*  
**REVIEWED BY:** Ara Mhrianian, Director of Community Development *AM*  
**APPROVED BY:** Doug Willmore, City Manager *DW*

**ATTACHED SUPPORTING DOCUMENTS:**

- A. Turboprop Community Overflight Activity Timeline (page A-1)
- B. PV Peninsula Turboprop Overflight Data (page B-1)
- C. Mokulele Airlines Turboprop Altitudes over PV Peninsula (page C-1)
- D. Pre/Post Metroplex Analysis of LAX Departures OSHNN (page D-1)
- E. OSHNN8 Departure Flight Path (page E-1)
- F. Draft PowerPoint Presentation by Mr. Calvagna (page F-1)
- G. Email from Mr. Calvagna to the FAA dated April 23, 2018 (page G-1)

---

**BACKGROUND & DISCUSSION**

Creation of the LAX Community Noise Roundtable

The LAX Community Noise Roundtable (Roundtable) is a voluntary and independent body created in 2000 in order to function as a group to receive adverse jet and turbopropeller (turboprop) aircraft noise complaints from citizens, prioritize discussions and suggest feasible resolutions to reduce noise to the Federal Aviation Administration (FAA). The Roundtable, as an advisory body working cooperatively with the FAA, seeks to reduce jet and turboprop aircraft noise without shifting noise from one community to another. Roundtable membership consists of elected officials and designated staff, representatives of congressional offices, representatives of

Homeowner Associations and the City of Los Angeles World Airport (LAWA) staff, who function to gather data and offer analysis on aircraft arriving and departing from Los Angeles International Airport (LAX).

Over the years, various City staff and/or Council-appointed volunteer RPV residents have served on the Roundtable. As a member of the Roundtable, RPV's representative, currently Staff from the Community Development Department, participates in the regularly scheduled public meetings at LAX, which occur on the second Wednesday of every odd numbered month. In between Roundtable meetings, resident concerns regarding aircraft noise are submitted to Staff who tracks and reports this information at the Roundtable meetings. However, noise concerns regarding low flying aircraft that are below the altitudes of FAA published jet and turboprop departure procedures follow General Aviation Rules and outside the scope of Roundtable.

### Peninsula Overflight Outcomes Resulting from the Roundtable

#### Turboprop Aircraft:

Dating as far back as 2002, RPV Roundtable representatives made persistent attempts to work with the FAA to remove turboprop aircraft, which fly at lower altitudes than jet powered aircraft, from flying over the Peninsula (see Attachment A). Although some gains were made when the FAA routed, as a flight route test, turboprop aircraft to a more distant offshore route (JEDDD procedure), eastbound turboprop flights continued to cross Peninsula airspace. In October 2016, LAWA reported that the FAA cancelled the experimental JEDDD procedure route citing aircraft separation issues. The FAA reverted back to an established turboprop route procedure, which routed turboprop aircraft closer to the Peninsula and the FAA made a decision to not make changes to divert eastbound flights away from the Peninsula, thus curtailing the Roundtable's earlier efforts to address turboprop aircraft over or near the Peninsula. During this period, due to the restructuring of one of the turboprop carriers operating from LAX, turboprop aircraft activity over the Peninsula decreased, but the decrease in flights was not attributed to Roundtable's efforts. In 2015, SkyWest (an aircraft carrier) retired its turboprop aircraft fleet. The turboprop aircraft flights over the Peninsula decreased from 3,844 overflights in 2014 to 1,662 overflights in 2015 (see Attachment B). However, despite this decrease, in June 2016, a new turboprop carrier, Mokulele Airlines, began operations out of LAX, which may have spurred new aircraft noise complaints. Mokulele Airlines uses Cessna Caravan turbopropellers, which are older and slower aircraft. LAWA had noted that FAA air traffic controllers appear to be setting a 5,000 feet altitude restriction for this airline when overflying the Peninsula (see Attachment C). The lower flying altitude for this noisier aircraft is a likely source for many recent resident noise complaints to LAWA's aircraft noise complaint platform, [www.lawa.org.laxanc](http://www.lawa.org.laxanc).

#### Southern California Metroplex Project:

In response to concerns raised by the Roundtable, in April 2017, the FAA began implementing its SoCal Metroplex Project, which is a regional redesign of the airspace over Southern California. The intent of Mextroplex was to redesign jet and turboprop flight paths with adequate spacing horizontally and vertically throughout the region. An outcome of this project was, among other things, to mitigate noise impacts. With respect to the jet aircraft departures from LAX towards the Peninsula, the SoCal Metroplex project did not change the flight routes where southbound and eastbound departing flights are routed over the ocean and away from the Peninsula. The FAA did, however, modify vector points or aircraft waypoints east of the Peninsula. According to the FAA, this is to provide a safe separation distance between aircraft. However, as reported by LAWA, after the implementation of the Metroplex project, Peninsula overflights more than doubled because, for many flights, FAA air traffic controllers were directing aircraft to leave their published flight route from a location approximately 10 miles offshore to destinations which took the aircraft over the Peninsula.

LAWA staff compiles data of southbound jets, which depart LAX and are directed by the FAA to overfly the Peninsula. In February 2017, which was before the implementation of SoCal Metroplex, the number of vectored jets which overflew the Peninsula during the month was 198 (see Attachment D). In contrast, in February 2018, the number of vectored jets which overflew the Peninsula increased to 455 for that month. LAWA staff concluded that the reason for the Peninsula jet overflight increase is due to FAA air traffic controllers directing jets, for safety purposes, to a new waypoint location in Fullerton, which routes aircraft from a location west or south of the Peninsula. The previous waypoint, which has been eliminated by the FAA as part of the SoCal Metroplex, was a location near Seal Beach, which if followed, would route aircraft over the ocean instead of the Peninsula.

A spike in noise complaints from concerned residents has resulted from the overflight increase this past year which prompted residents to question the legitimacy of the FAA's concern for safe spacing of aircraft when jets are directed to fly over the Peninsula. According to Mr. Calvagna and others, it appears, that for the most part, there is no clear safety reason for routing flights over the Peninsula other than to shorten the duration of a flight (see Attachment G). At the March 14, 2018, Roundtable meeting, Mr. Calvagna presented information documenting the flights over the Peninsula and how drastically different these flight paths are from the Metroplex (an updated presentation will be provided by Mr. Calvagna at the May 1 City Council meeting).

In response to the increase of Peninsula overflights, RPV Roundtable Staff sought and obtained the Roundtable's support to send a letter to the FAA demanding the elimination of Peninsula jet overflights and to increase the overflight altitude of a specific turboprop carrier, Mokulele Airlines. Specifically, a motion was passed at the March 14, 2018, Roundtable meeting to draft a letter to the FAA demanding the following actions:

- FAA air traffic controllers are to adhere to the published OSHNN8 offshore procedure (see Attachment E), which routes southbound jets from LAX around the Peninsula between 9 p.m. and 7 a.m.;

- When necessary for safe spacing, FAA air traffic controllers are to direct jets from the route OSHNN8 procedure beginning east of the HOLTZ waypoint (see Attachment E). This will allow jets to more closely follow the published jet route over the ocean and not overfly RPV and other communities; and,
- FAA air traffic controllers are to raise the 5,000-foot altitude restriction on Mokulele Airlines' Cessna Caravan turboprop overflying the Peninsula.

#### LAX Roundtable Ad Hoc Committee:

In November 2017, a Roundtable Ad Hoc Committee was created to further convey Roundtable recommendations to the FAA through letters and meetings. The FAA is anticipated to resume participating at the Roundtable meetings (the FAA stopped attending the Roundtable in November 2017), which Staff believes will help with communication between Roundtable recommendations and implementation with air traffic controllers. The RPV Roundtable staff motion at the March 14, 2018, Roundtable meeting was approved for the Ad Hoc Committee to draft a letter to the FAA, which will likely occur within the next few weeks.

#### Reporting Aircraft Noise

Information on aircraft noise related matters can be found on the City's website under the Community Development Department homepage for Airspace Noise and Safety Concerns (<http://www.rpvca.gov/274/Airspace-Noise-Safety-Concerns>). Additionally, Roundtable updates are reported in the City's Weekly Administrative Report, the City's quarterly newsletter, and to list-serve subscribers.

Jet and turboprop aircraft noise complaints originating and departing from LAX can be filed on the following platform administered by LAWA:

- LAX Noise Complaints at <https://www.lawa.org/laxanc/>

Other aircraft noise complaints which are caused by low flying aircraft including small planes towing advertising banners, small planes carrying tourists, WW2 vintage planes, ultralight "flying lawnmotor" aircraft, are not administered by LAWA's complaint platform as these aircraft are considered to be operating under the FAA's General Aviation Rules. However, noise complaints or any other complaints attributed to low flying aircraft can be made to the airports where the aircraft has originated from or directly to operators of the aircraft. Both Torrance Municipal and Long Beach (LGB) airports provide noise complaint hotlines, respectively (310) 784-7950 and (562) 570-2665. With respect to commercially-operated helicopter noise complaints, noise reduction efforts have been led by the Los Angeles Area Helicopter Noise Coalition. The Coalition had recent setbacks when the FAA denied 4 petitions to regulate helicopter flight routes, minimum altitudes, and hovering time. Still, the Coalition monitors coastal area helicopter noise and safety issues and provides a website where noise complaints can be submitted, <http://lahelicopternoise.org/complaints/>.

Residents are also encouraged to attend and voice their concerns at the Roundtable meetings. The March 14<sup>th</sup> Roundtable meeting was attended by almost a dozen RPV residents.

### **ADDITIONAL INFORMATION**

At the May 1, 2018, City Council meeting, Mr. Calvagna will be presenting a PowerPoint on the results of his independent monitoring of aircraft flights over the Peninsula and on his independent communication with the FAA (see Attachment G). The draft presentation is attached (see Attachment F).

departures at LAX with the understanding that the FAA controller may not grant the request or that the inboard runway may be closed during that time.

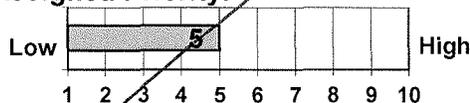
- In May 2014, Roundtable Facilitator provided a briefing on the LAX Preferential Runway Use Report which examined the effectiveness of the Preferential Runway Use Policy at LAX. The report indicated that adherence to the Policy continued to be high with over 90% of the operations complying with the Policy and included recommendations to further improve adherence. The report was prepared and submitted to Caltrans as part of the Title 21 Noise Variance process.

**Ongoing Actions:**

- LAWA to continue to work with the FAA in an effort to minimize the use of 25L for departures.
- LAWA to continue to monitor runway utilization on the south complex and provide periodic statistical updates to the Roundtable. This update is currently scheduled for May and November of each year.

**Status:** Active

**Assigned Priority:**



**LAWA Workload:** Medium

**A10. Turboprop Community Overflights**

**Impact Description:**

Turboprop aircraft departing to the south with destinations to the east overfly the PV Peninsula and Torrance heading to the Seal Beach VOR.

**Areas Primarily Affected:**

Southern Sector (PV Peninsula, Torrance)

**Mitigation Activities:**

- In 2002, FAA has routed most turboprops off the PV Peninsula, with only ONT, PSP and SNA operations overflying communities.
- Roundtable sent a letter to FAA, in May 2003, to request remaining aircraft to be routed offshore from Palos Verdes Peninsula.
- Roundtable sent a letter to FAA, in February 2004, requesting the floor altitude of the Class B airspace to be increased near PV Peninsula. FAA did not make the requested change.
- FAA established and implemented the HOLTZ, KARVR and OSHNN RNAV departure procedures, in late 2004, to move jet departures that would be flying the LAXX DP further offshore with the intent of possibly moving more turboprops over the ocean.
- FAA developed a new RNAV procedure for turboprop aircraft called JEDDD in April 2008 to reroute turboprops further offshore from the PV Peninsula. Testing is required before the procedure can be utilized. FAA anticipated that the procedure will be active by April 2010. The JEDDD procedure will not reroute turboprops with destinations to ONT, PSP, and SNA. FAA will explore alternative options for these aircraft.

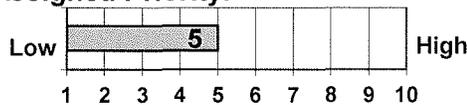
- In December 2010, Roundtable sent a letter to FAA to inquire the status on the JEDDD procedure. In January 2011, FAA responded to indicate that it decided not to implement the procedure because, through testing, it was not able to maintain aircraft separation between jets and turboprops without vectoring aircraft off the JEDDD route. However, FAA noted that it will explore other options such as redesigning the JEDDD procedure or creating an entirely new RNAV procedure for turboprop aircraft.
- Roundtable's letter to FAA regarding OAPM (Metroplex) recommendations dated September 2012 included suggestions to 1) explore options of redesigning the JEDDD procedure that will meet all necessary requirements to allow full implementation of the procedure, 2) reroute the remaining turboprop aircraft that are currently overflying the Peninsula to offshores routes, and 3) if option 2 proves infeasible, then increase the minimum altitude of turboprop aircraft that overfly the Peninsula.
- In October 2016, FAA confirmed the cancellation of the JEDDD procedure due to aircraft separation issues as noted previously in the FAA's January 2011 response letter. The FAA indicated that developing a new departure procedure for turboprop aircraft would require Class B airspace modification, which is outside the scope of the Metroplex project. Furthermore, the FAA indicated that the turboprop traffic at LAX has decreased significantly since SkyWest retired its turboprop aircraft in mid-2015.
- In July 2017, LAWA provided a preliminary analysis indicating an increase in lower altitude turboprop operations over PV Peninsula. This may have occurred due to Mokulele Airline's Cessna Caravan performance characteristics and an FAA altitude restriction in place for this aircraft type. LAWA is working with FAA to obtain a better understanding of this issue and plans to report back to the Roundtable at a later date with more information.

**Ongoing Actions:**

- LAWA to continue monitoring turboprop operations and provide statistical updates to the Roundtable. This update is currently scheduled for May and November of each year.

**Status:** Active

**Assigned Priority:**



**LAWA Workload:** Medium

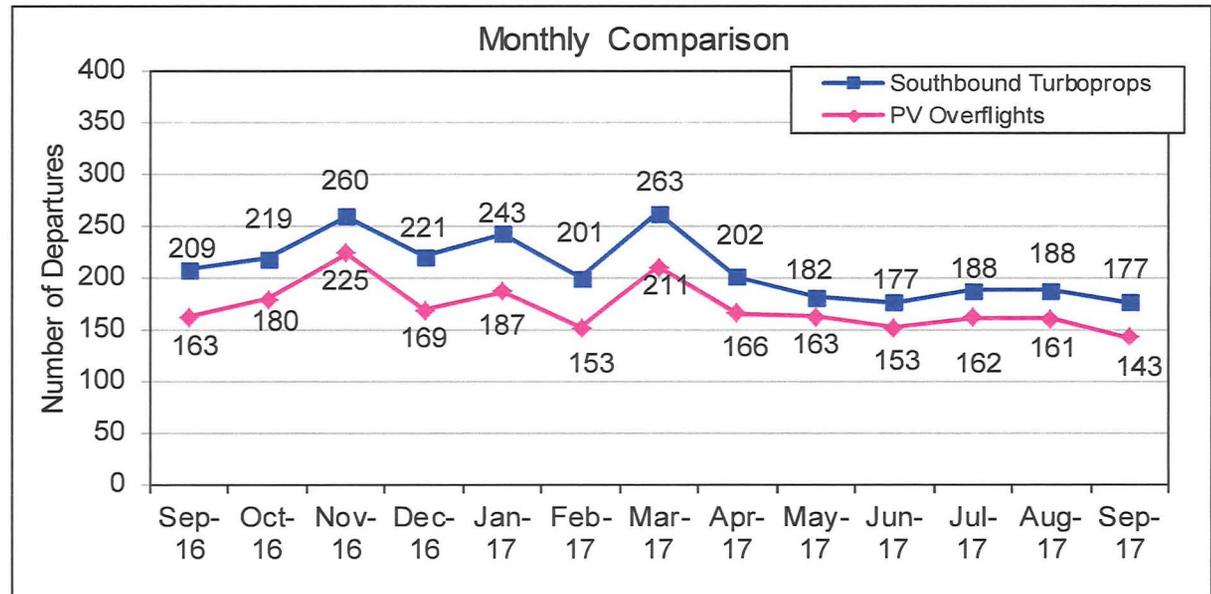
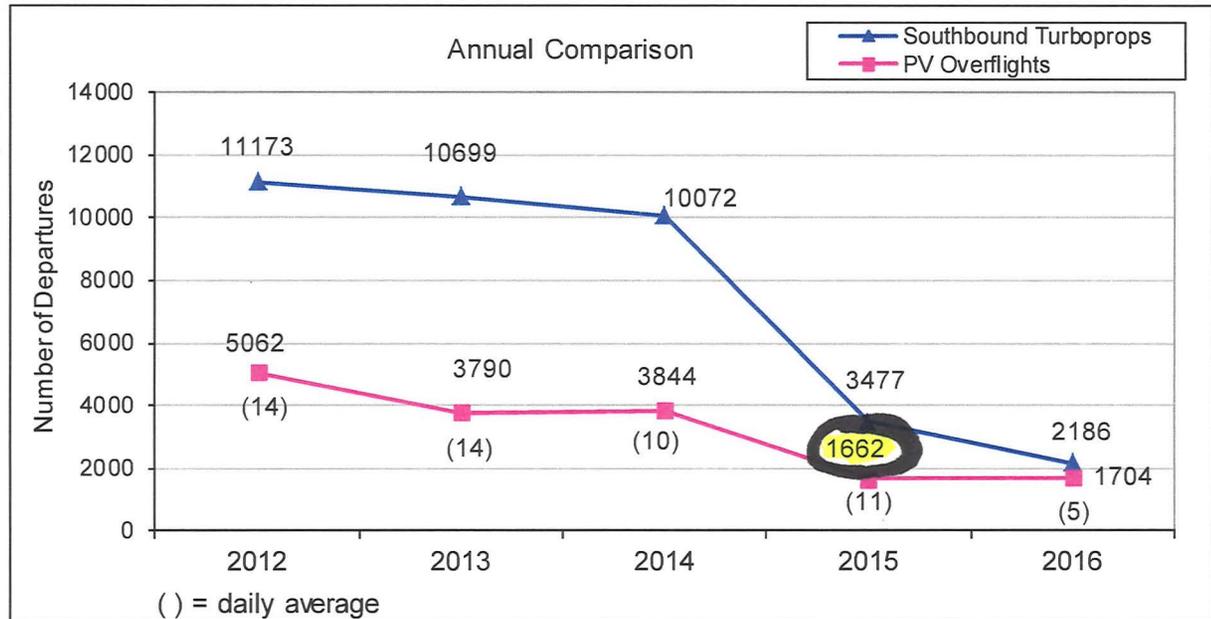
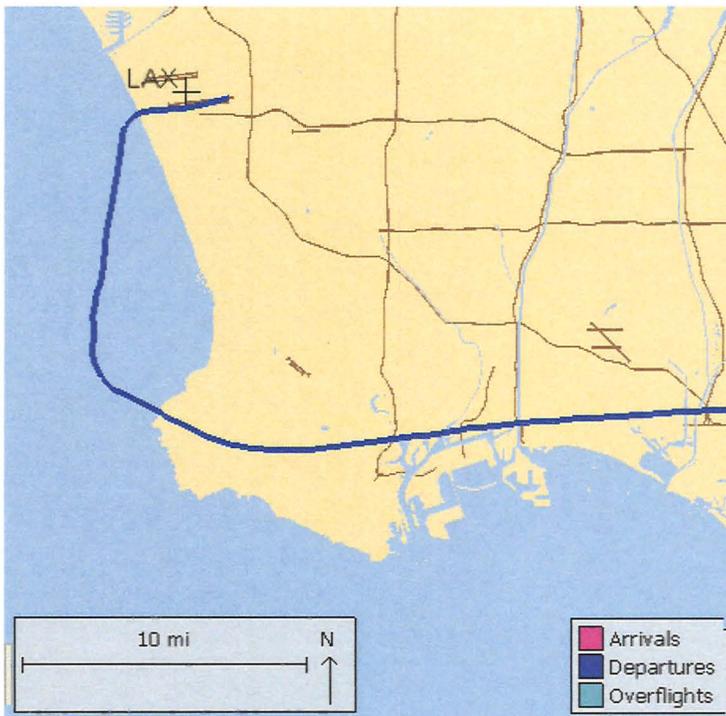
**A12. Noise Exposure From A320 Family of Aircraft**

**Impact Description:**

Researchers in Europe have identified a high-pitched noise from the older A320 family of aircraft as the aircraft descends for landing, caused by air flowing across open cavities under the wing. The noise can be heard several miles from the runway before the deployment of landing gear. Researchers have developed a simple solution called the Vortex Generator that solves this particular problem. The Vortex Generator is a small metal device placed in front of the open cavities that changes the air flow and reduces the noise by 2 dB to 6 dB. Airbus is already placing vortex generators on newly

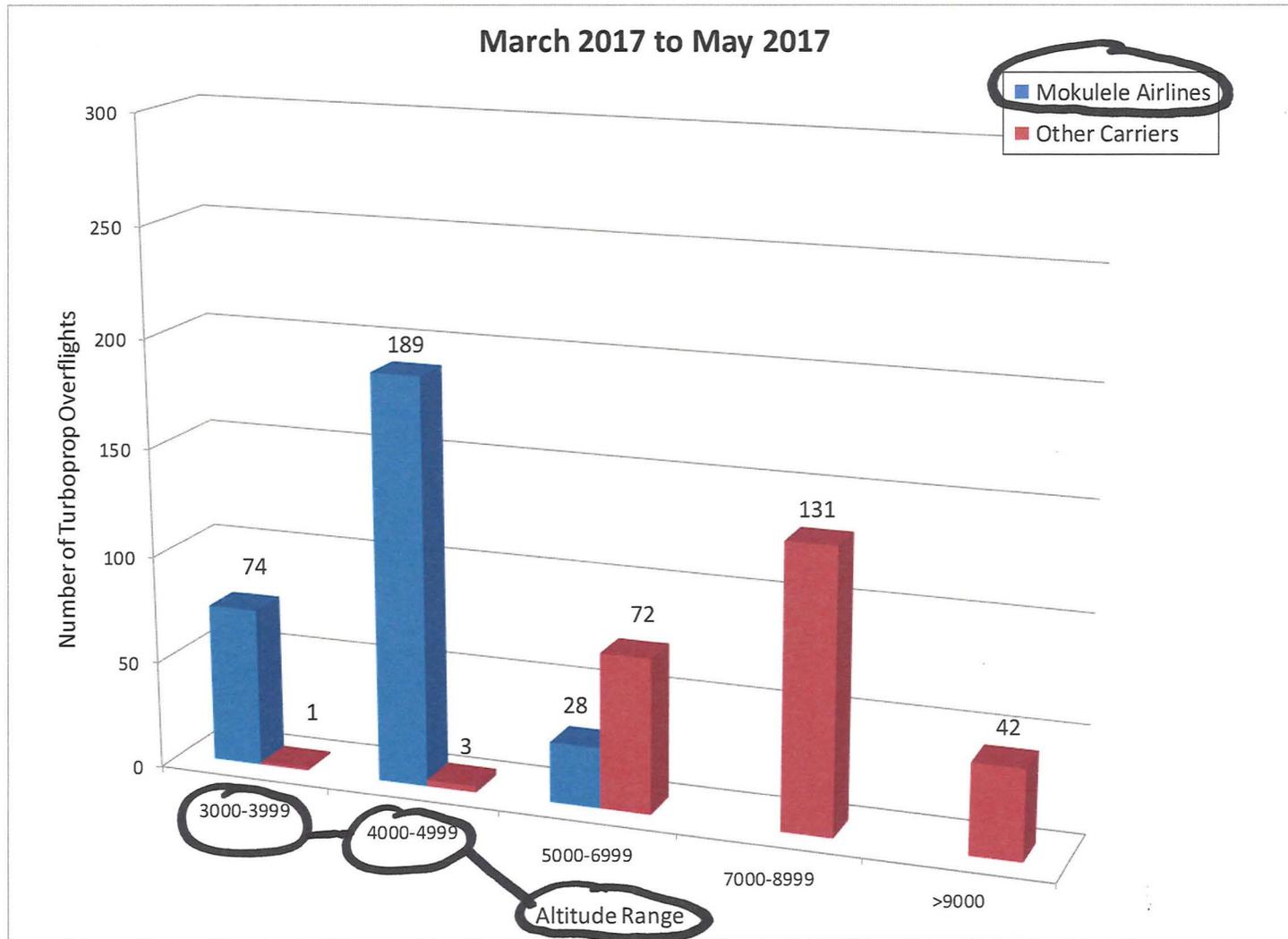
# Palos Verdes Peninsula – Turboprop Overflights

Monitoring southbound turboprops departing from LAX that overfly Peninsula



**Note:** Prior to SkyWest’s fleet mix change (turboprop to jet) in early 2015, monthly southbound turboprops were ~800 and PV overflights were ~300.

# Turboprop Altitudes over PV Peninsula



Pre/Post Metroplex Analysis of LAX Departures OSHNN/SEBBY Overflying Palos Verdes Peninsula (PV)					
Month-Year	Jet Departures (OSHNN/SEBBY)	Vectored Jet Departures	%	Vectored Jet Departures Overflying PV	%
Oct-16	2,450	1,865	76.1%	200	8.2%
Nov-16	1,984	1,607	81.0%	166	8.4%
Dec-16	1,979	1,542	77.9%	220	11.1%
Jan-17	1,951	1,551	79.5%	191	9.8%
Feb-17	1,831	1,409	77.0%	215	11.7%
<b>Pre-Metroplex Monthly Average</b>	<b>2,039</b>	<b>1,595</b>	<b>78.3%</b>	<b>198</b>	<b>9.8%</b>
Mar-17	2,146	1,314	61.2%	368	17.1%
Apr-17	1,876	1,213	64.7%	347	18.5%
May-17	1,813	1,077	59.4%	442	24.4%
Jun-17	2,366	1,338	56.6%	426	18.0%
Jul-17	2,745	1,722	62.7%	562	20.5%
Aug-17	2,528	1,540	60.9%	536	21.2%
Sep-17	2,166	1,320	60.9%	481	22.2%
Oct-17	2,245	1,266	56.4%	381	17.0%
Nov-17	2,313	1,297	56.1%	503	21.7%
Dec-17	2,000	1,198	59.9%	491	24.6%
Jan-18	1,985	1,200	60.5%	463	23.3%
<b>Post-Metroplex Monthly Average</b>	<b>2,198</b>	<b>1,317</b>	<b>59.9%</b>	<b>455</b>	<b>20.8%</b>

Note: Pre-Metroplex SEBBY and OSHNN departures were vectored SLI VOR; Post-Metroplex departures vectored to CAHIL

# OSHNN EIGHT DEPARTURE (RNAV)

AL-237 (FAA)

LOS ANGELES INTL (LAX)  
LOS ANGELES, CALIFORNIA

SW-3, 01 FEB 2018 to 01 MAR 2018

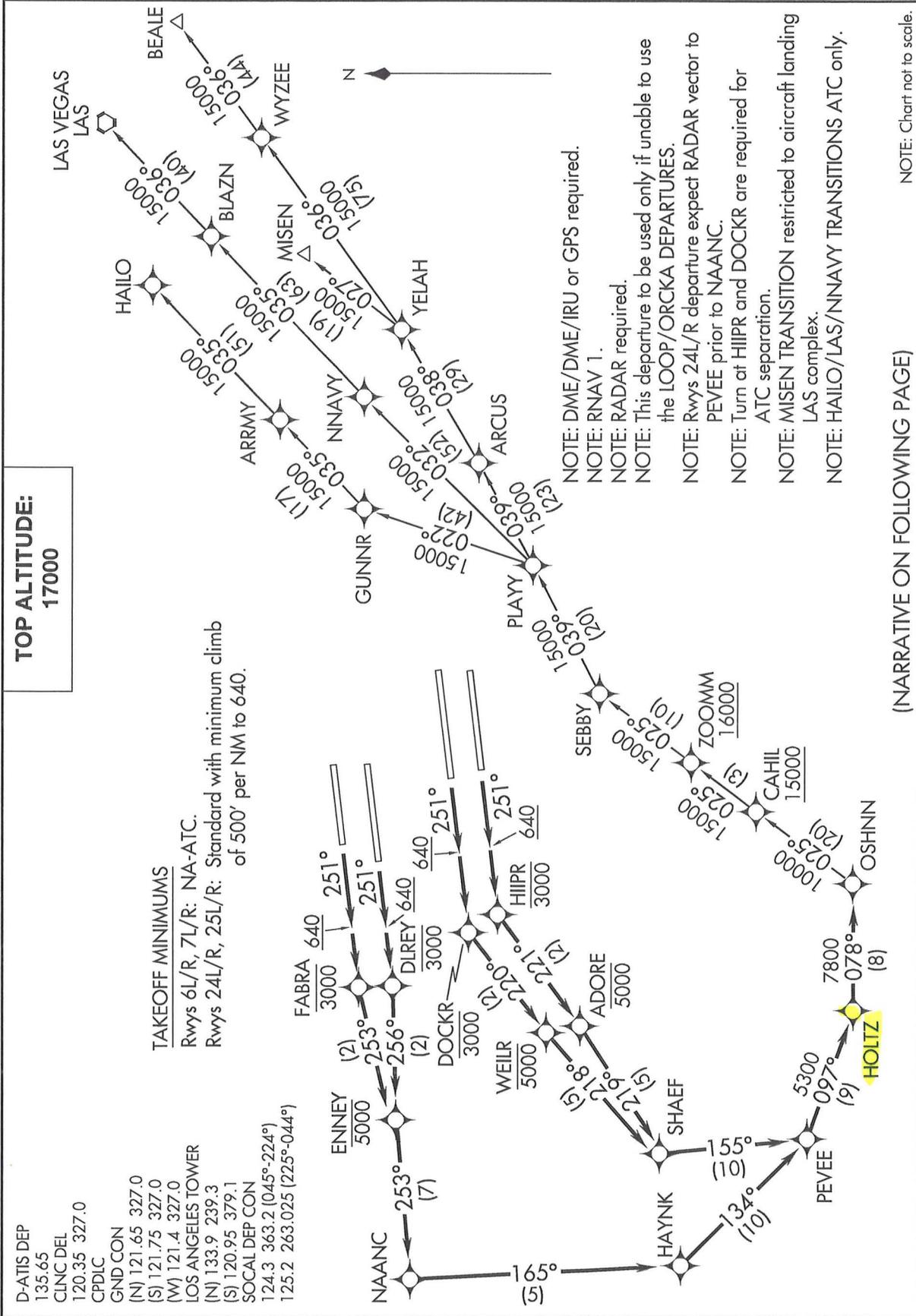
**TOP ALTITUDE:  
17000**

D-ATIS DEP  
135.65  
CLNC DEL  
120.35 327.0  
CPDLC  
GND CON  
(N) 121.65 327.0  
(S) 121.75 327.0  
(W) 121.4 327.0  
LOS ANGELES TOWER  
(N) 133.9 239.3  
(S) 120.95 379.1  
SOCAL DEP CON  
124.3 363.2 (045°-224°)  
125.2 263.025 (225°-044°)

### TAKEOFF MINIMUMS

Rwys 6L/R, 7L/R: NA-ATC.

Rwys 24L/R, 25L/R: Standard with minimum climb of 500' per NM to 640.



- NOTE: DME/DME/IRU or GPS required.
- NOTE: RNAV 1.
- NOTE: RADAR required.
- NOTE: This departure to be used only if unable to use the LOOP/ORCKA DEPARTURES.
- NOTE: Rwys 24L/R departure expect RADAR vector to PEVEE prior to NAANC.
- NOTE: Turn at HIIPR and DOCKR are required for ATC separation.
- NOTE: MISEN TRANSITION restricted to aircraft landing LAS complex.
- NOTE: HAILO/LAS/NAVY TRANSITIONS ATC only.

(NARRATIVE ON FOLLOWING PAGE)

NOTE: Chart not to scale.

SW-3, 01 FEB 2018 to 01 MAR 2018

# OSHNN EIGHT DEPARTURE (RNAV)

(OSHNN8.OSHNN) 17AUG17

LOS ANGELES, CALIFORNIA  
LOS ANGELES INTL (LAX)

# OSHNN EIGHT DEPARTURE (RNAV)

AL-237 (FAA)

LOS ANGELES INTL (LAX)  
LOS ANGELES, CALIFORNIA

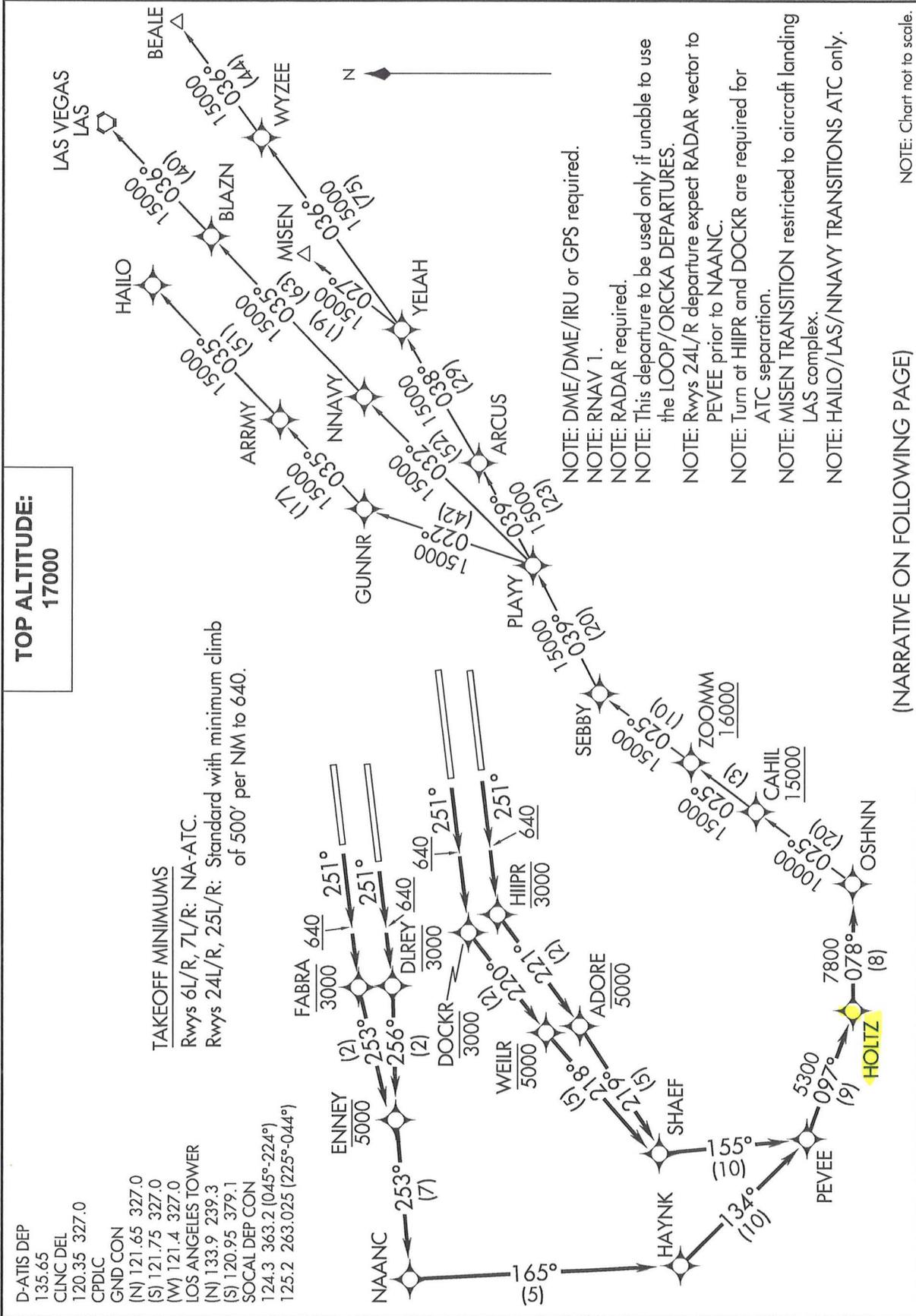
SW-3, 01 FEB 2018 to 01 MAR 2018

**TOP ALTITUDE:  
17000**

D-ATIS DEP  
135.65  
CLNC DEL  
120.35 327.0  
CPDLC  
GND CON  
(N) 121.65 327.0  
(S) 121.75 327.0  
(W) 121.4 327.0  
LOS ANGELES TOWER  
(N) 133.9 239.3  
(S) 120.95 379.1  
SOCAL DEP CON  
124.3 363.2 (045°-224°)  
125.2 263.025 (225°-044°)

### TAKEOFF MINIMUMS

Rwys 6L/R, 7L/R: NA-ATC.  
Rwys 24L/R, 25L/R: Standard with minimum climb of 500' per NM to 640.



- NOTE: DME/DME/IRU or GPS required.
- NOTE: RNAV 1.
- NOTE: RADAR required.
- NOTE: This departure to be used only if unable to use the LOOP/ORCKA DEPARTURES.
- NOTE: Rwys 24L/R departure expect RADAR vector to PEVEE prior to NAANC.
- NOTE: Turn at HIIPR and DOCKR are required for ATC separation.
- NOTE: MISEN TRANSITION restricted to aircraft landing LAS complex.
- NOTE: HAILO/LAS/NAVY TRANSITIONS ATC only.

(NARRATIVE ON FOLLOWING PAGE)

NOTE: Chart not to scale.

SW-3, 01 FEB 2018 to 01 MAR 2018

# OSHNN EIGHT DEPARTURE (RNAV)

(OSHNN8.OSHNN) 17AUG17

LOS ANGELES, CALIFORNIA  
LOS ANGELES INTL (LAX)

# **Rancho Palos Verdes City Council Meeting**

## **LAX Departure Overflights of Palos Verdes and San Pedro**

**Comments by Jeff Calvagna**

**Rancho Palos Verdes**

**1 May 2018**

**[jcalvagna@netzero.com](mailto:jcalvagna@netzero.com)**

## Summary of Key Points

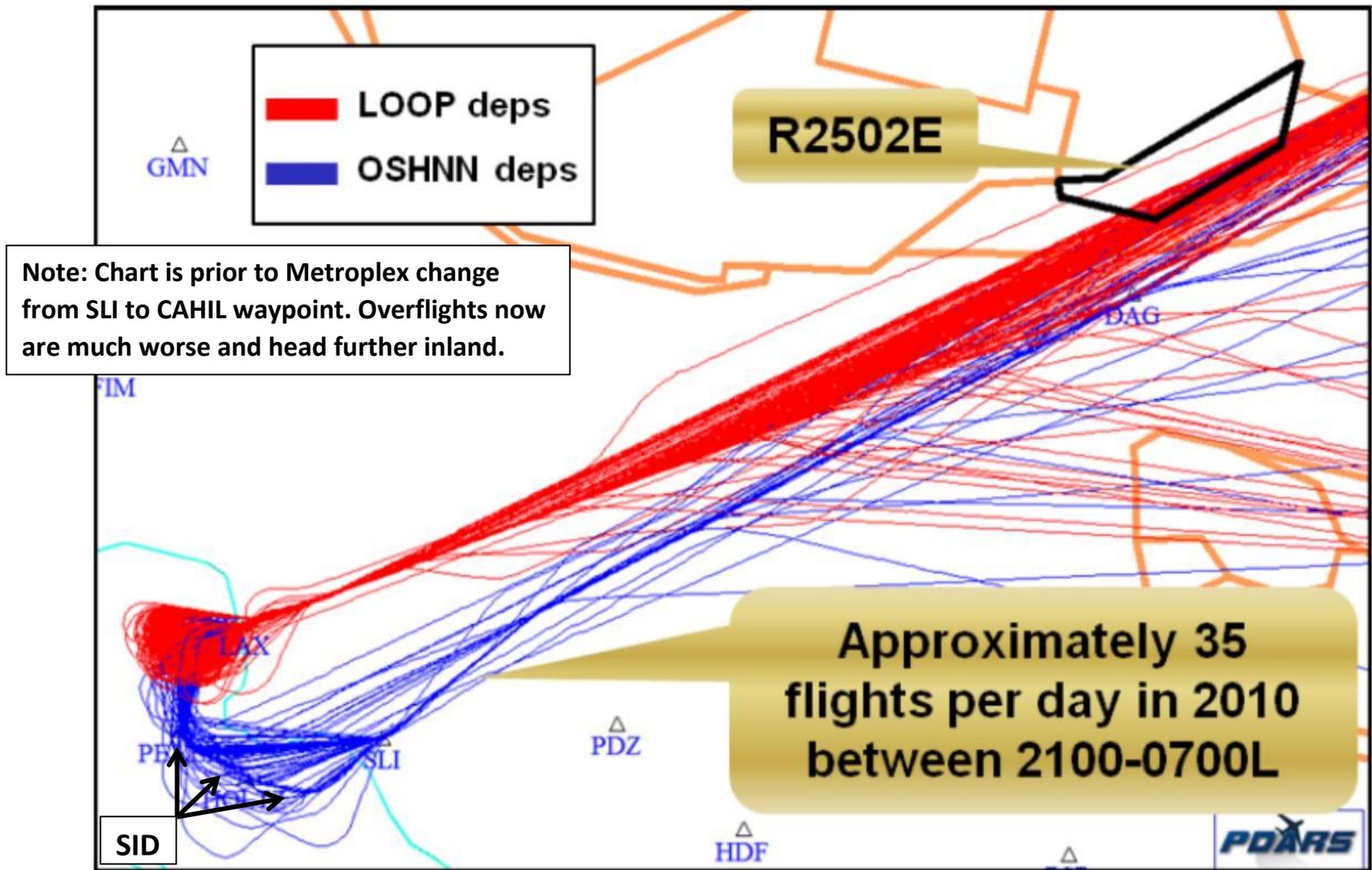
- LAX Departure overflights of South Palos Verdes and San Pedro have increased dramatically since NextGen Metroplex was implemented
- Rountable staff identified movement of the OSHNN departure waypoint from SLI (Seal Beach) to CAHIL (Fullerton) as the cause
- In truth, the actual root cause is that the FAA is ignoring their own documented standard instrument departure procedure (OSHNN8 SID)
  - OSHNN was designed for noise abatement, it keeps aircraft offshore longer and makes landfall over an unpopulated area
  - Yet around 70% of the time, SoCal TRACON vectors low flying departures off the SID and over Palos Verdes and San Pedro neighborhoods
  - How can a “standard” departure “require” so much shortcutting?
- Studying flight patterns and Air Traffic Control communications makes clear this is happening for ATC and pilot convenience (not “required”)
- The FAA wants it both ways. OSHNN8 looks good on paper for noise abatement, but the de-facto SID is over Palos Verdes and San Pedro homes

# OSHNN8 Standard Instrument Departure (SID) Source of Most Palos Verdes and San Pedro Overflights



***OSHNN SID designed for noise abatement yet ATC routinely shortcuts noisy departures over PV and San Pedro Residential Neighborhoods***

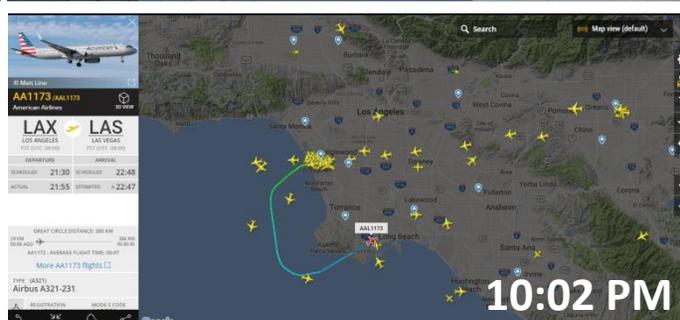
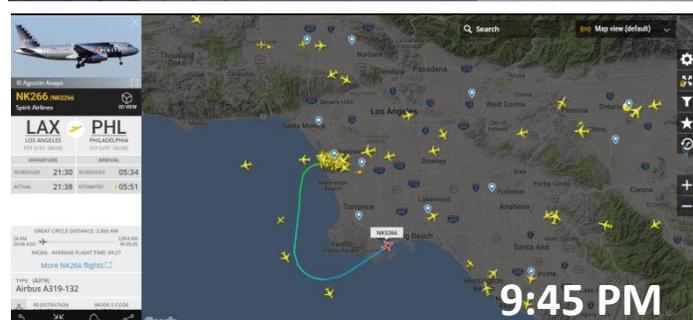
# 70% of OSHNN Departures shortcut over/near the PV Peninsula



*Graphic from the Metroplex Technical Report shows OSHNN Departures and prevalence of SID Shortcutting*



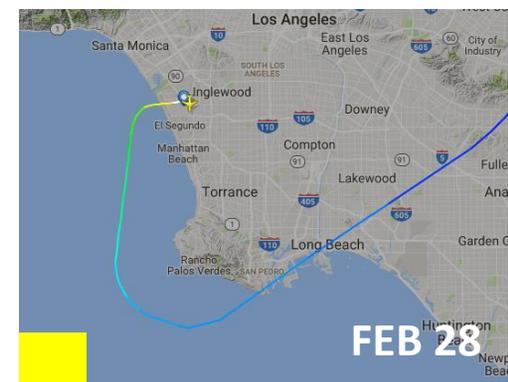
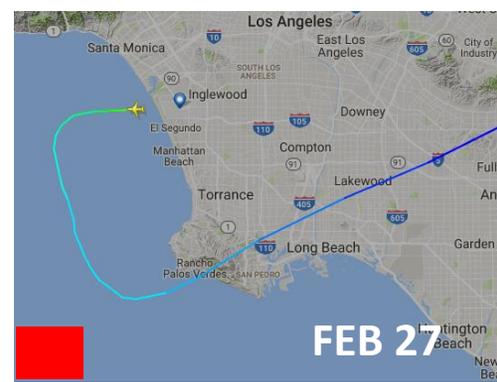
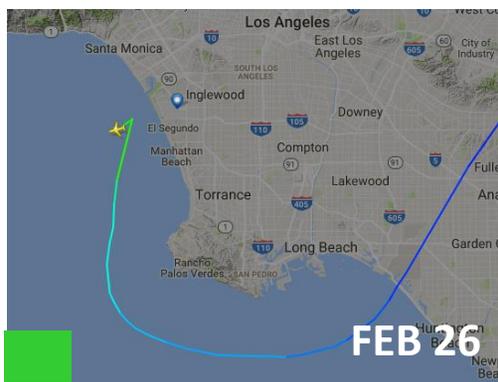
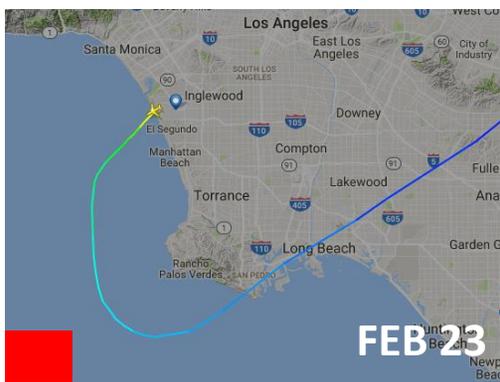
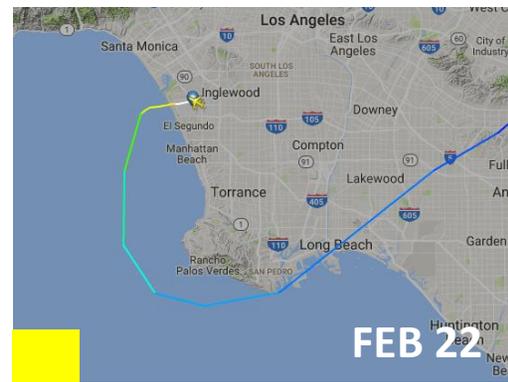
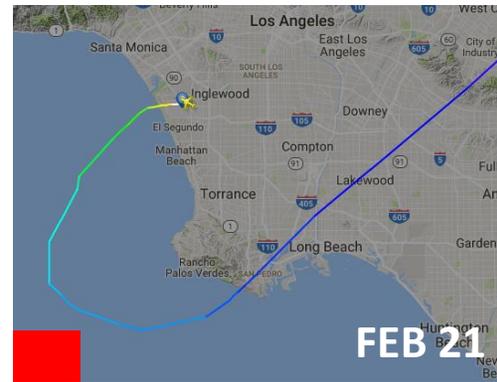
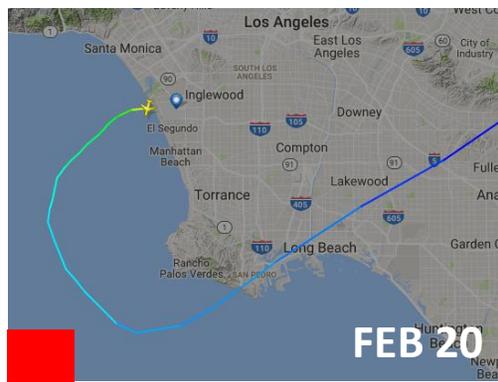
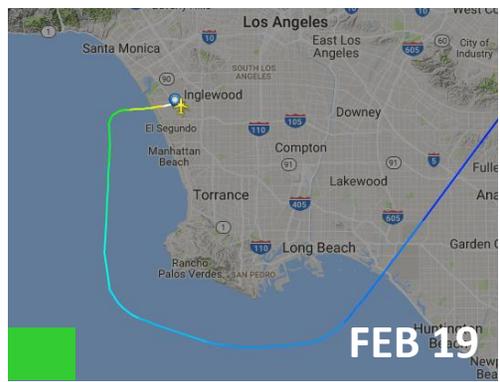
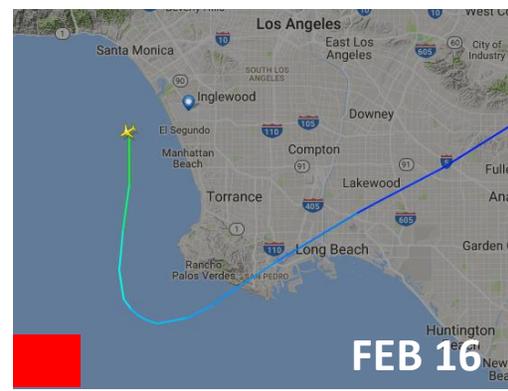
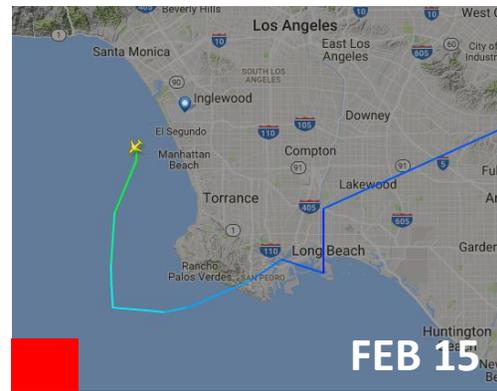
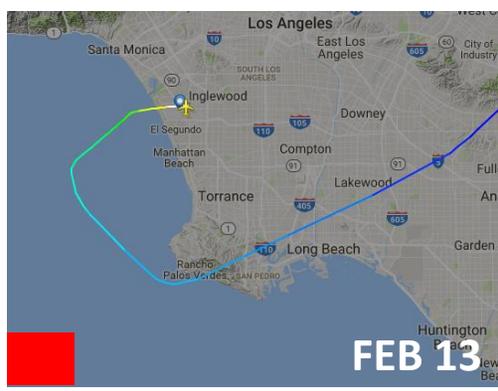
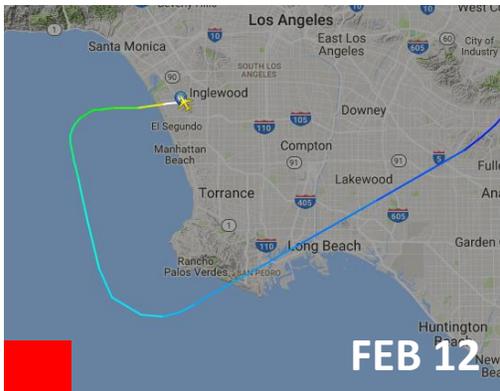
# OSHNN Shortcuts – Jan 19<sup>th</sup>, 9:20 PM to 10:02 PM



During this evening period, not a single flight correctly flew the SID, all shortcut over or near Palos Verdes

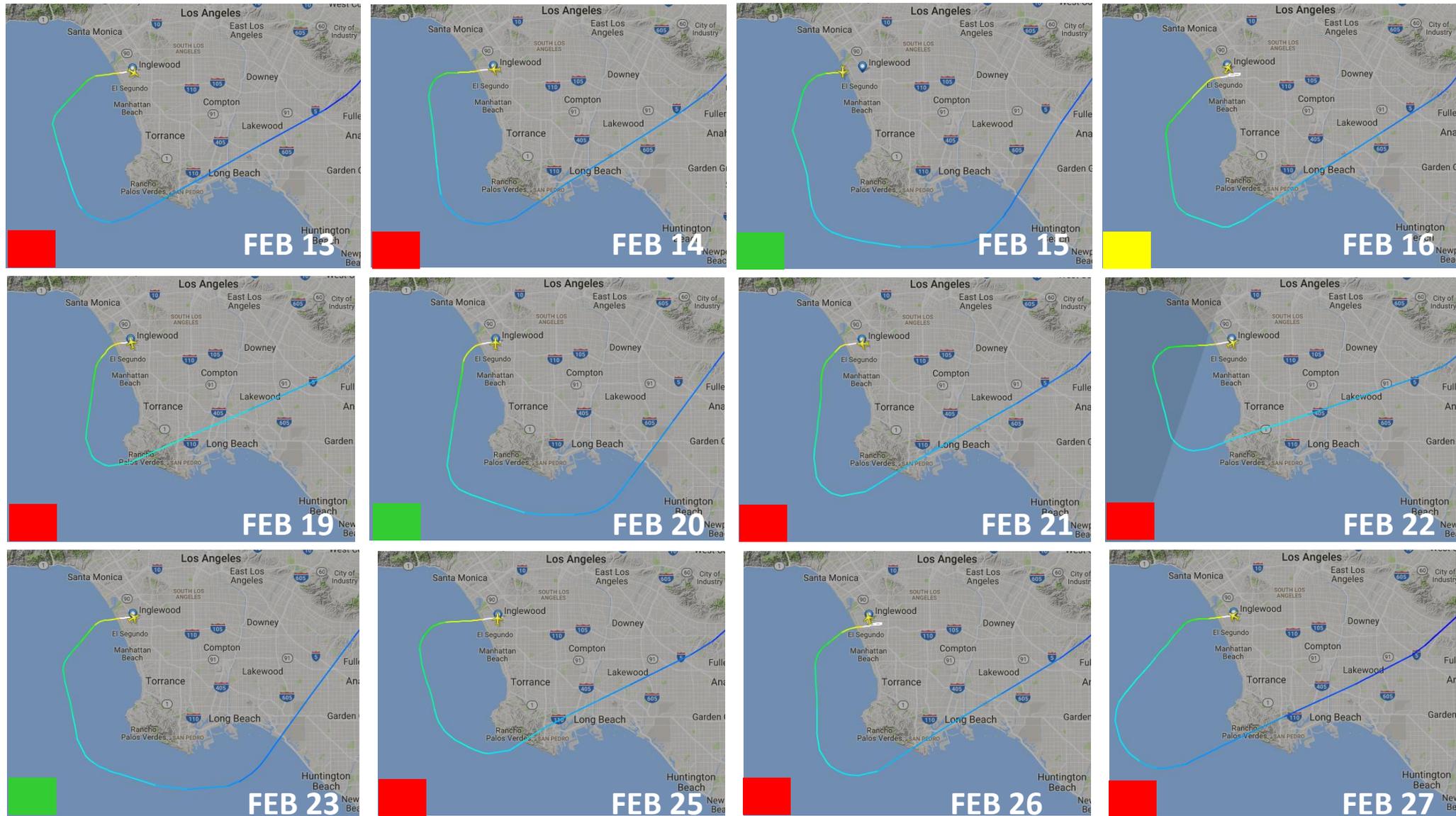
**During peak OSHNN usage aircraft can overfly PV every 2-3 minutes**

# Case Study – Southwest 1283 (LAX → LAS, 9:23 PM Departure)



**Out of 12 flights, 8 overflowed Palos Verdes/San Pedro (67%)**  
**2 flew the SID (green), 2 HOLTZ shortcut (yellow), 8 PEVEE shortcut (red)**

# Case Study – Delta 1404 (LAX → SLC, 6:00 AM Departure)



**Out of 12 flights, 8 overflowed Palos Verdes/San Pedro (67%)**

**3 flew the SID (green), 1 HOLTZ shortcut (yellow), 8 PEVEE shortcut (red)**

# Why is This Happening? (ATC Vector “Direct CAHIL”)

Regarding PV overflights, the July 2017 LAX Noise Roundtable report stated:

*“FAA determines whether aircraft remain on RNAV procedure (OSHNN 7) or they vector them to another waypoint (e.g., CAHIL) when required for spacing”*

Evaluation of flight patterns and monitoring SoCal TRACON communications with aircraft shows this is not “required” but being done for convenience

- Peninsula overflights are a minimum of 7.5 miles off the SID
- If OSHNN truly “requires” this deviation 70% of the time then frankly it isn’t safe
- This just isn’t credible. The NextGen Metroplex report didn’t even mention these deviations and recommended no changes to the OSHNN SID.

The NextGen Metroplex technical report hints at what is really going on:

*“Another major issued raised by both ATC and industry stakeholders is the inefficiency of using the OSHNN SID between 2100 and 0700, which adds between 14 NM to 23 NM to the route compared to the LOOP SID.”*

***ATC and pilots don’t like OSHNN because it’s inconvenient. “Direct to CAHIL” is a free pass at Palos Verdes and San Pedro resident’s expense***

# Why is This Happening? (ATC Vector “Direct CAHIL”)

## Why would ATC and pilots want to shortcut the OSHNN SID?

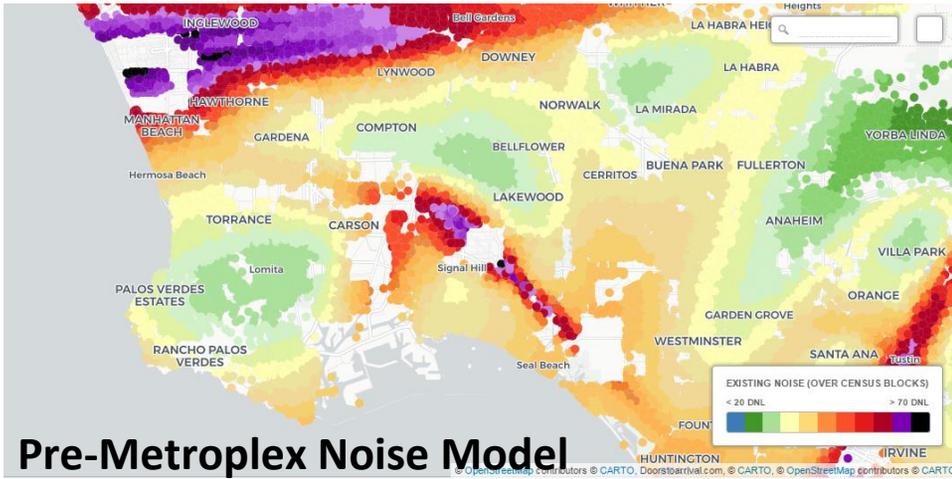
- OSHNN is longer and takes more time – particularly if the aircraft had originally filed for the ORCKA (loop) departure
- OSHNN is complex and slower – three turns, at PEVEE, HOLTZ, and OSHNN
- OSHNN is busy – PEVEE to OSNNH leg shared with the DOTSS departure
  - More ATC intervention needed to de-conflict with DOTSS traffic
  - Speed restrictions often needed to maintain separation
  - Altitude restrictions due to Long Beach (LGB) southern departures
- OSHNN delays ATC hand-off from SoCal TRACON to LA Center (ZLA)

Since there is no PV air traffic, “Direct to CAHIL” is a free pass SoCal TRACON uses to make these concerns go away, rarely is it “required for spacing”

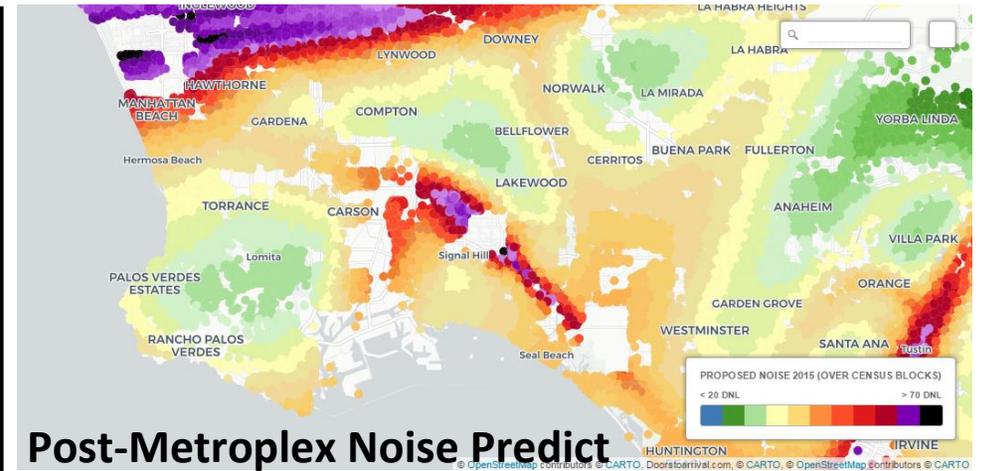
“Direct to CAHIL” allows the FAA to have its cake and eat it too

- OSHNN SID looks good on paper and meets noise abatement requirements
- In reality, ATC routinely ignores it and the de-facto SID is over my house and thousands of others. The FAA isn’t following its own procedures.

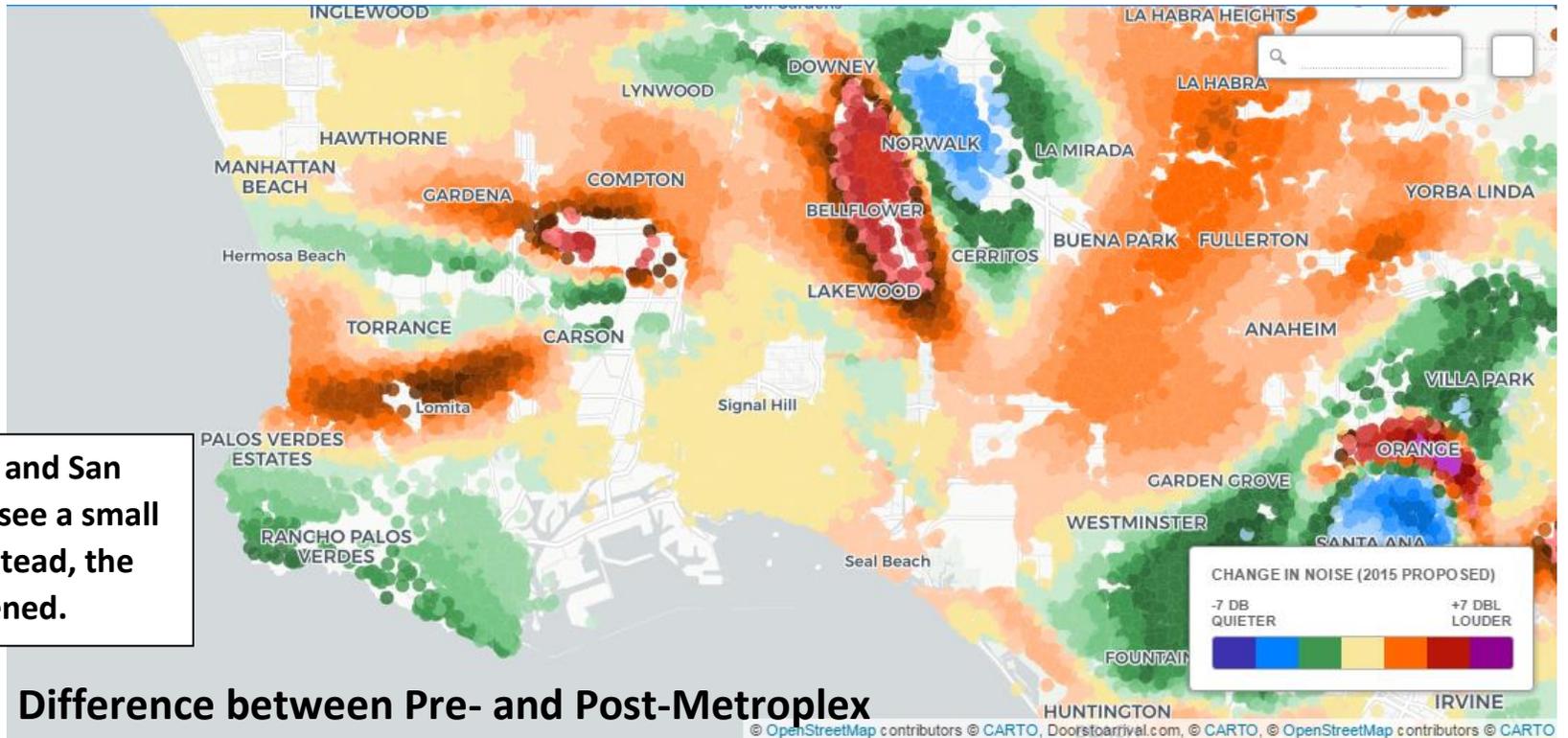
# Metroplex Analysis Predicted a Noise Decrease for South PV and San Pedro



Pre-Metroplex Noise Model



Post-Metroplex Noise Predict



Difference between Pre- and Post-Metroplex

South Palos Verdes and San Pedro predicted to see a small noise decrease. Instead, the opposite has happened.

**Noise Model didn't consider that the OSHNN SID is ignored >70% of the time**

# **We Need Action NOW, Not More Studies!**

**The noise over Palos Verdes and San Pedro has increased dramatically and the FAA owes us some answers:**

- Why isn't the FAA following its own documented OSHNN8 procedure?
- How can the OSHNN SID be a "standard" departure when it is ignored 70% of the time? (definition of "standard": *used or accepted as normal*)
- Why does SoCal TRACON think it's acceptable to routinely vector noisy low-altitude jet departures over thousands of residential homes?
- Why did the Metroplex analysis predict a decrease in Palos Verdes Peninsula noise levels when the opposite has happened?
- Why did the July 2017 report characterize these OSHNN deviations as "required for spacing" when the overwhelming majority clearly aren't?

**We don't need another year of studies! We need the FAA to follow its own documented procedures now.**

**No more "Direct CAHIL" vectoring, particularly before the HOLTZ waypoint!**

**No deviations from the OSHNN SID unless there is a clear and compelling requirement to do so for safety.**

**From:** [Ara Mihranian](#)  
**To:** [Robert Nemeth](#); [John Alvarez](#)  
**Subject:** FW: Palos Verdes SID shortcutting 4/22/2018  
**Date:** Monday, April 23, 2018 9:47:46 PM

---

FYI...

We should add this as public comments.

---

**From:** Doug Willmore  
**Sent:** Monday, April 23, 2018 6:12 PM  
**To:** Ara Mihranian <[AraM@rpvca.gov](mailto:AraM@rpvca.gov)>; Gabriella Yap <[gyap@rpvca.gov](mailto:gyap@rpvca.gov)>  
**Subject:** FW: Palos Verdes SID shortcutting 4/22/2018

---

**From:** Jeff Calvagna [<mailto:jcalvagna@netzero.com>]  
**Sent:** Monday, April 23, 2018 9:13 AM  
**To:** [ian.gregor@faa.gov](mailto:ian.gregor@faa.gov); [richard.sullivan@faa.gov](mailto:richard.sullivan@faa.gov)  
**Cc:** [joey.apodaca@mail.house.gov](mailto:joey.apodaca@mail.house.gov); [jacqueline.hamilton@mail.house.gov](mailto:jacqueline.hamilton@mail.house.gov); Susan Brooks <[SusanB@rpvca.gov](mailto:SusanB@rpvca.gov)>; CC <[CC@rpvca.gov](mailto:CC@rpvca.gov)>; Robert Nemeth <[rnemeth@rpvca.gov](mailto:rnemeth@rpvca.gov)>; [atm@laartcc.org](mailto:atm@laartcc.org); [nickolas.christopher@faa.gov](mailto:nickolas.christopher@faa.gov); [allen.kenitzer@faa.gov](mailto:allen.kenitzer@faa.gov); [dennis.roberts@faa.gov](mailto:dennis.roberts@faa.gov); [tamara.a.swann@faa.gov](mailto:tamara.a.swann@faa.gov); [brian.harmelink@faa.gov](mailto:brian.harmelink@faa.gov); [michael.valencia@faa.gov](mailto:michael.valencia@faa.gov); [tracey.johnson@faa.gov](mailto:tracey.johnson@faa.gov); [tom.hayes@faa.gov](mailto:tom.hayes@faa.gov); [david.keeling@faa.gov](mailto:david.keeling@faa.gov); [Sherry.avery@faa.gov](mailto:Sherry.avery@faa.gov); [Anthony.porras@faa.gov](mailto:Anthony.porras@faa.gov); [jason.dedrick@faa.gov](mailto:jason.dedrick@faa.gov); [gregory.haywood@faa.gov](mailto:gregory.haywood@faa.gov)  
**Subject:** Palos Verdes SID shortcutting 4/22/2018

To:  
Ian Gregor - FAA Public Affairs Office  
Richard Sullivan - Air Traffic Manager, SoCal TRACON

CC:  
Joey Apodaca - Staff, Congressman Lieu  
Jacqueline Hamilton - Staff, Congresswoman Bass  
Susan Brooks - Mayor, Rancho Palos Verdes  
Members - Rancho Palos Verdes City Council  
Robert Nemeth - RPV LAX Noise Roundtable representative

Additional FAA personnel copied as noted at the bottom of this email

Mr. Gregor and Mr. Sullivan,

After several days of good adherence to the OSHNN8 SID, Air Traffic Control discipline completely broke down last night as LAX departures were continuously shortcut over the

Palos Verdes Peninsula. Late Sunday night, (4/22), Air Traffic Control directed 22 LAX Departures to shortcut off the SID and overfly our community. Review of adjacent air traffic shows that none of these were required for aircraft separation. This illegal shortcutting must stop.

Our noise monitor network recorded 18 separate noise events 20 dB or more above the ambient noise level. The OSHNN8 SID was designed for noise abatement and cannot be ignored simply because the Controllers find it inconvenient. This behavior is illegal as the FAA should realize, since it was recently sued by Laguna Beach, California for this exact same behavior. The January 2018 FAA settlement with Laguna Beach demonstrates that the FAA understands this. We also expect the FAA to follow its own published procedures, or we will take whatever steps are necessary to protect our community.

Aircraft direct by ATC to shortcut the SID over the Palos Verdes Peninsula (PVP) late night on 4/22:

- 9:17 PM – SWA2543 (LAX – DEN), shortcut OSHNN8 11 miles west of SID over PVP
- 9:24 PM – SWA3012 (LAX-LAS) shortcut OSHNN8 11 miles west of SID over PVP
- 9:45 PM – DAL1506 (LAX-LAS) shortcut OSHNN8 10 miles west of SID over PVP
- 10:05 PM – AAL2685 (LA-LAS), shortcut OSHNN8 9.5 miles west of SID over PVP
- 10:50 PM - DAL877 (LAX-IND), shortcut OSHNN8 11 miles west of SID over PVP
- 11:01 PM – SWA2728 (LAX-LAS), shortcut OSHNN8 9 miles west of SID over PVP
- 11:21PM – WJA1103 (LAX-YYZ), shortcut OSHNN8 11 miles west of SID over PVP
- 11:23 PM – JBU988 (LAX-BOS), shortcut OSHNN8 10 miles west of SID over PVP
- 11:39 PM – DAL1106 (LAX-DTW), shortcut OSHNN8 11 miles west of SID over PVP
- 11:48 PM – UAL660 (LAX-ORD), shortcut OSHNN8 10 miles west of SID over PVP
- 11:53 PM – ASA1114 (LAX –IAD), shortcut DOTSS2 1 mile off PVP coast
- 12:05 AM – SWA2967 (LAX-DEN), shortcut OSHNN8 12 miles west of SID over PVP
- 12:08 AM – NKS128 (LAX-BWI), shortcut OSHNN8 10 miles west of SID over PVP
- 12:14 AM – AAL219 (LAX-ORD), shortcut DOTSS2 0.5 mile off PVP coast
- 12:20 AM, AAL2406 (LAX-DFW), shortcut DOTSS2 1 mile off PVP coast
- 12:27 AM – NKS658 (LAX-PIT), shortcut OSHNN8 10 miles west of SID over PVP
- 12:34 AM – DAL308 (LAX-CUN), shortcut DOTSS2 0.5 mile off PVP coast
- 12:43 AM – AAL1875 (LAX-CLT), shortcut DOTSS2 1 mile off PVP coast
- 12:50 AM – DAL1352 (LAX-DTW), shortcut OSHNN8 11 miles west of SID over PVP
- 1:03 AM – UAL910 (LAX-ORD), shortcut DOTSS2 1 mile off PVP coast
- 1:07AM – FFT408 (LAX-DEN), shortcut OSHNN8 11 miles west of SID over PVP
- 1:11 AM – ETH505 (LAX-DUB), shortcut OSHNN8 9 miles west of SID over PVP

It should be noted that on the following Monday morning (4/23), SID adherence was again excellent. This disparate behavior indicates that this illegal shortcutting can be attributed to specific Controllers on duty at the time. The FAA must implement corrective action to ensure all Controllers understand that shortcutting aircraft over the Palos Verdes Peninsula is unacceptable, unless clearly required for safety. None of last night's shortcuts fell in that category.

Although I have corresponded with you for the last month, I have widened the distribution of this email to include additional FAA personnel. For their benefit, I will restate what we expect from the FAA:

ATC will cease shortcutting OSHNN8 SID departures over the Palos Verdes Peninsula (PVP). ATC will not shortcut aircraft off the OSHNN8 SID (Direct CAHIL, Direct SEBBY) prior to reaching the HOLTZ waypoint.

- ATC will cease shortcutting DOTSS2 SID departures over/along the coast of the PVP. ATC will not shortcut aircraft off the DOTSS2 SID (Direct DOTSS, Direct EYEDL) prior to reaching the PEVEE waypoint.
- The FAA will implement effective corrective action and police the behavior of its controllers. While SID adherence has improved over the last month, these continued breakdowns demonstrate that specific Controllers require oversight from TRACON leadership.

The PVP's western location and protrusion from the coastline make our community particularly susceptible to LAX Departure noise events if the SIDs are ignored. This was why the SIDs were designed to keep aircraft a minimum of four miles of the PVP coast. They are not optional; they cannot be ignored simply because a Controller finds them inconvenient.

Also, we have taken steps to ensure we have independent means to assess the FAA behavior in this regard:

- We have implemented an ADS-B/multilateration network on the PVP to compile our own flight track data and altitude data. We are compiling data on adjacent aircraft during shortcut events.
- We are rolling out a Peninsula-wide noise monitor network to continuously record and archive noise event levels. The first monitor is already online with the second going online next week.
- We are installing equipment to continuously record and archive ATC/aircraft communications by TRACON (both Del Rey and Coast areas) and the LA ARTCC.
- We are reviewing our legal options particularly in light of the Laguna Beach settlement.

We are very serious about protecting our quality of life and we expect effective corrective action on the FAA's part. These continued breakdowns demonstrate any corrective action to date has not been sufficient.

Again, we invite both of you to attend the May 1<sup>st</sup> Rancho Palos Verdes City Council meeting (as this topic is on the agenda) to discuss the FAA's behavior in this regard.

Jeff Calvagna  
Rancho Palos Verdes, CA

Additional personnel copied on this email:

- Dennis Roberts, FAA Regional Administrator
- Tamara Swann, FAA Regional Deputy Administrator

Air Traffic Operation Western Service Area South

- Brian Harmelink, Deputy Director of Operations WS (Renton, WA)
- Southern California District, Lawndale
- o Michael Valencia, Manager, Southern California District
  - o Tracey H. Johnson, Assistant Manager, Southern California District

Southern California TRACON, San Diego

- Tom J Hayes, Manager, SoCal TRACON
- Richard Sullivan, Air Traffic Manager, SoCal TRACON
- David V Keeling, ATC Specialists Supervisor, SoCal TRACON

LAX Air Traffic Control Tower, LAX

- Sherry Avery, Manager, LAX Air Traffic Control Tower
- Anthony Porras, LAX Air Traffic Control Tower
- Jason P Dedrick, ATC Specialists Supervisor, LAX Air Traffic Control Tower

Los Angeles Center (ZLA), Palmdale

- Lisa Jones, Operations Manager, Los Angeles ARTCC (Honolulu)
- Gregory Haywood, Air Traffic Manager, Los Angeles ARTCC (Palmdale)