

COMMUNITY DEVELOPMENT DEPARTMENT

UPDATE - Federal Aviation Administration (FAA) Responds to the City Council Regarding New STHBY and KYLOW Proposed Departure Procedures

On February 7, 2023, Staff reported to the City Council that the FAA was to imminently implement two new aircraft flight LAX departure procedures titled STHBY and KYLOW. The City Council expressed concerns that these procedures would vector noisy aircraft closer to the PV Peninsula, and authorized the Mayor to send a letter notifying the FAA of the City Council's concerns and



position opposing the new departure procedures (Attached). On April 10, 2023, the FAA issued a letter (Attached), which included an encouraging response to the Mayor, citing that the FAA is delaying the publication of the proposed flight paths until November 2023 to allow additional time for the FAA to consider LAWA's requested changes.

In order for the City and other affected communities to be provided with timely updates that result from anticipated future meetings between the FAA staff and Air Traffic Controllers, City staff is requesting that future meeting agendas for the LAX Community Noise Roundtable include FAA updates. Specifically, City staff sent a letter (Attached) requesting regular updates from the FAA concerning the feasibility of STHBY and KYLOW procedure changes requested by both LAWA and the City of Rancho Palos Verdes.

Through the LAX Roundtable, City staff will continue to monitor developments concerning these two flight procedures and provide timely updates to the City Council through the City Manager's Administrative Weekly Report. For more information, please contact Associate Planner, Robert Nemeth at (310) 544-5285 or via email at rnemeth@rpvca.gov.



BARBARA FERRARO, MAYOR
JOHN CRUIKSHANK, MAYOR PRO TEM
ERIC ALEGRIA, COUNCILMEMBER
DAVID L. BRADLEY, COUNCILMEMBER
PAUL SEO, COUNCILMEMBER

February 7, 2023

Via Email

Erik Amend
Acting Regional Administrator
Federal Aviation Administration
777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

SUBJECT: Letter Opposing the FAA's Two New Departure Procedures – STHBY and KYLOW

Dear Mr. Amend:

On February 7, 2023, the Rancho Palos Verdes City Council held a regular meeting that included a City staff report on the City's participation in the LAX Community Noise Roundtable and the FAA's latest proposal to implement two new departure procedures titled STHBY and KYLOW from LAX. These departure procedures, due to their proximity to the Palos Verdes Peninsula, pose a threat to the nighttime tranquility this community currently enjoys and is thereby vehemently opposed by the City of Rancho Palos Verdes.

This City Council, and the community it represents, are also dismayed by the lack of notification from the FAA about the proposal. These concerns have already been expressed to you by the Los Angeles World Airports (LAWA) staff in their letter to the FAA dated December 12, 2022 (see attachment). We echo their comments and as such, the City Council requests the following items be considered:

1. That the FAA revise the two new proposed departure procedures named STHBY and KYLOW to ensure that passenger jets are prohibited from initiating turns prior to the shoreline.
2. That the FAA use the existing waypoint PEVEE, which is farther away from the Peninsula than the new waypoint STHBY, which is approximately half a mile closer to the Peninsula.
3. That the FAA place a specific notation, "For use only when nighttime noise abatement procedures are in effect," for new departure procedures.

It is disheartening that your proposal lacks community outreach and that there has been a complete disregard for the many years it took to develop the existing noise abatement procedures with Roundtable communities. Should the FAA decide to implement its new

Acting Regional Administrator Amend
February 7, 2023
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route proposals, this action will significantly erode the public trust that took many years to foster. Therefore, we implore you to give serious consideration to the above requests as we believe these measures would safeguard the Peninsula from unwanted aircraft noise and could provide the FAA with the improved, safer airspace it is seeking.

Sincerely,



Barbara Ferraro
Mayor, City of Rancho Palos Verdes

cc: Rancho Palos Verdes City Council and City Manager
Faviola Garcia, FAA Western-Pacific Acting Deputy Regional Administrator
Jacki Bacharach, Executive Director, South Bay Cities Council of Governments

Enclosure: LAWA letter to FAA dated December 12, 2022



U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Office of the Regional Administrator

777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

April 10, 2023

The Honorable Barbara Ferraro
Mayor, City of Rancho Palos Verdes
30940 Hawthorne Blvd.
Rancho Palos Verdes, CA 90275

Dear Mayor Ferraro:

Thank you for your letter dated February 7, 2023, regarding the STHBY and KYLOW proposed departure procedures. We appreciate your city's engagement and participation in the Los Angeles International Airport/Community Noise Roundtable.

Enclosed is our response letter dated January 26, 2023, to Los Angeles World Airports' (LAWA) December 12, 2022, letter. As you will find in our response, we are delaying the publication of the procedures to consider LAWA's input.

The FAA's mission is to provide the safest, most efficient aerospace system in the world. If we can be of further assistance, please contact my office at (424) 405-7000.

Sincerely,

Erik W. Amend
Acting Regional Administrator

Enclosure



U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Office of the Regional Administrator

777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

January 26, 2023

Samantha Bricker
Chief Sustainability and Revenue Management Officer
Los Angeles World Airports
1 World Way
Los Angeles, California 90045

Dear Samantha Bricker:

Subject: LAWA's Comments on Two New Departure Procedures – STHBY and KYLOW

Thank you for your letter dated December 12, 2022, concerning two new departure procedures, STHBY and KYLOW. The Federal Aviation Administration (FAA) values our longstanding, open, and transparent working relationship with Los Angeles World Airports (LAWA). As such, we would like to highlight the collaborative steps we took to ensure LAWA was proactively briefed.

The new departure procedures were briefed twice to LAWA. The first briefing was on May 24, 2022, during which we were asked for additional graphics to help clarify the flight paths. At the follow-up meeting, held on June 29, 2022, we presented those graphics and answered additional questions. The June 29 presentation showed the anticipated publication date of the new procedures was targeted for December 29, 2022.

As discussed during the two briefings, these procedures will enhance safety and efficiency during the nighttime Over-Ocean Operations by expediting the initial separation from opposite direction Over-Ocean arrivals. Turning aircraft away from inbound opposite direction traffic at the soonest opportunity enhances safety by providing earlier separation and improves efficiency by accommodating increases in nighttime traffic volume. Also, the procedures were designed to ensure aircraft will remain at least five statute miles west and three statute miles south of the Palos Verdes peninsula until leaving 13,000 feet mean sea level.

As a precursor, the Performance Based Navigation (PBN) work group meeting for these changes was held in March of 2016, prior to a more inclusive approach to stakeholder involvement that developed after the Southern California (SoCal) Metroplex. The changes were put on hold for the SoCal Metroplex project. A subsequent meeting was held with Air Traffic Control (ATC) in May and August of 2021 to ensure the procedure changes were still needed and met the needs of ATC.

When working collaboratively with airport sponsors—especially those who are also participating members of a community roundtable—we rely on their awareness and knowledge of potentially

impacted communities. During the May 24 and June 29 meetings, LAWA did not voice any specific concerns about the procedure changes, request any additional changes, or mention the need for community outreach. Subsequently, we received input from your office, and we appreciate the opportunity to work together

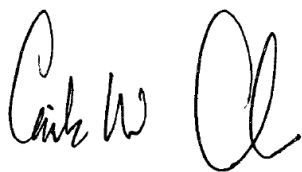
After meeting with your office on December 7, 2022, and considering LAWA's input, we have moved the publication from February 23, 2023, to November 30, 2023, to allow us to study your requested changes. We are anticipating a meeting in early 2023 with ATC to examine the operational feasibility of your requests. If we require an additional work group, we will engage with LAWA to invite you to attend the meeting(s).

That said, this is an opportunity to explore ways to improve our joint collaboration and messaging. I look forward to discussing our findings and recommendations with LAWA leadership in the near future. The FAA remains committed to addressing community concerns and working collaboratively with all stakeholders as it seeks to improve the safety and efficiency of the NAS.

The FAA's mission is to provide the safest, most efficient aerospace system in the world. We will continually strive to improve the safety and efficiency of flight in this country.

If we can be of further assistance, please contact my office at (424) 405-7000.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik Amend', with a stylized flourish at the end.

Erik Amend
Acting Regional Administrator



Via email, DENNY@WELIVEFREE.COM

April 17, 2023

Denny Schneider, Chairman
LAX/Community Noise Roundtable
1 World Way
Los Angeles, CA 90009

Subject: Request for Regular FAA Updates; STHBY/ KYLOW Proposed Departure Procedures

Dear Chair Schneider,

On April 11, 2023, the City of Rancho Palos Verdes received a copy of the FAA's letter sent to LAWA dated January 26, 2023 (attached), announcing that the publication date for STHBY and KYLOW departure schedules has been postponed to November 30, 2023, allowing additional time for the FAA to consider LAWA's requested changes to the FAA's procedure changes. Although it is welcoming news that the FAA has postponed implementing the procedure changes, the City of Rancho Palos Verdes continues to be concerned with the anticipated negative impacts with the proposed STHBY and KYLOW procedures and that the FAA's decision on the procedures was a fait accompli.

The FAA mentions in its letter that it is seeking opportunities to improve collaboration and messaging with its stakeholders. To help the FAA fulfill this promise, it is requested that each future Roundtable meeting agenda includes an update from the FAA concerning the STHBY and KYLOW departure procedure until the time FAA decides whether to publish these departure procedures. Updates should include meeting results from Air Traffic Controllers and other working groups examining the operational feasibility of LAWA's requests. These requests from LAWA were included in the attached letter to the FAA dated December 12, 2022:

1. LAWA requests that the FAA revise the two new proposed departure procedures named STHBY and KYLOW so that passenger jets do not initiate their turns south prior to the shoreline.
2. LAWA requests the FAA use the existing waypoints or the FAA relocate the proposed new waypoints so that departures fly farther away from the Peninsula (i.e. the proposed new waypoint STHBY is approximately half a mile closer to the PV Peninsula than the existing waypoint PEVEE).
3. LAWA requests that both new departure procedures STHBY and KYLOW include the specific notation, "For use only when nighttime noise abatement procedures are in effect."

Updates should further include whether the FAA decided an additional work group



concerning the STHBY and KYLOW proposed departure procedures was needed and whether LAWA was engaged to attend the meetings.

The City of Rancho Palos Verdes thanks you and the Roundtable members for considering this request and we look forward to seeing regular FAA reporting updates.

Regards,

A handwritten signature in black ink that reads 'Robert Nemeth'.

Robert Nemeth

Enclosures:

1. FAA letter to LAWA dated January 26, 2023.
2. LAWA letter to FAA dated December 12, 2022.

CC: Faviola.Garcia, FAVIOLA.GARCIA@FAA.GOV
Darlene Donahue, DARLENE.DONAHUE@FAA.GOV
Kathryn Pantoja, KPANTOJA@LAWA.ORG
David Chan, DCHAN@LAWA.ORG



U.S. Department
of Transportation
**Federal Aviation
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Western-Pacific Region
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777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

January 26, 2023

Samantha Bricker
Chief Sustainability and Revenue Management Officer
Los Angeles World Airports
1 World Way
Los Angeles, California 90045

Dear Samantha Bricker:

Subject: LAWA's Comments on Two New Departure Procedures – STHBY and KYLOW

Thank you for your letter dated December 12, 2022, concerning two new departure procedures, STHBY and KYLOW. The Federal Aviation Administration (FAA) values our longstanding, open, and transparent working relationship with Los Angeles World Airports (LAWA). As such, we would like to highlight the collaborative steps we took to ensure LAWA was proactively briefed.

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As a precursor, the Performance Based Navigation (PBN) work group meeting for these changes was held in March of 2016, prior to a more inclusive approach to stakeholder involvement that developed after the Southern California (SoCal) Metroplex. The changes were put on hold for the SoCal Metroplex project. A subsequent meeting was held with Air Traffic Control (ATC) in May and August of 2021 to ensure the procedure changes were still needed and met the needs of ATC.

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impacted communities. During the May 24 and June 29 meetings, LAWA did not voice any specific concerns about the procedure changes, request any additional changes, or mention the need for community outreach. Subsequently, we received input from your office, and we appreciate the opportunity to work together

After meeting with your office on December 7, 2022, and considering LAWA's input, we have moved the publication from February 23, 2023, to November 30, 2023, to allow us to study your requested changes. We are anticipating a meeting in early 2023 with ATC to examine the operational feasibility of your requests. If we require an additional work group, we will engage with LAWA to invite you to attend the meeting(s).

That said, this is an opportunity to explore ways to improve our joint collaboration and messaging. I look forward to discussing our findings and recommendations with LAWA leadership in the near future. The FAA remains committed to addressing community concerns and working collaboratively with all stakeholders as it seeks to improve the safety and efficiency of the NAS.

The FAA's mission is to provide the safest, most efficient aerospace system in the world. We will continually strive to improve the safety and efficiency of flight in this country.

If we can be of further assistance, please contact my office at (424) 405-7000.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik Amend', with a stylized, flowing script.

Erik Amend
Acting Regional Administrator

December 12, 2022

Mr. Erik Amend
Acting Regional Administrator
Federal Aviation Administration
Western-Pacific Region
777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

RE: LAWA's Comments on Two New Departure Procedures – STHBY and KYLOW

Dear Mr. Amend:

Los Angeles World Airports (LAWA) recently received a notification from the Federal Aviation Administration (FAA) indicating that the agency is proposing to amend one flight procedure and create two new flight procedures at LAX. The stated purpose for these proposed procedures is to provide greater air traffic separation between departures and arrivals during Over-Ocean noise abatement configuration from 12 AM to 6:30 AM, and to improve the safety and efficiency of the airspace during that same period. These proposed procedures are currently scheduled to be published on February 28, 2023.

LAX

Van Nuys

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Justin Erbacci
Chief Executive Officer

Upon review of the proposed flight procedures, LAWA is very concerned that these departure operations will not be consistent with the LAX No Turn Before Shoreline policy, will result in more departures flying closer to coastline communities in the South Bay and Palos Verdes Peninsula, and will be used at times other than when Over-Ocean noise abatement configurations are in effect. If FAA cannot specifically resolve the items of concern, then LAWA will not support the implementation of these proposed procedures as currently designed.

LAWA is also very concerned that this information was not shared with potentially affected communities earlier in the process, and that airport staff were not invited to participate in any working groups that were convened to discuss the proposed procedures. It seems the process for FAA requested flight procedure changes is not transparent and does not include any public outreach. It should not fall solely to the airport to notify community groups, such as the LAX/Community Noise Roundtable, to inform them of the FAA's intent to publish revised or new proposed procedures within just a few months, as LAWA had to do.

The two new procedures (STHBY ONE and KYLOW ONE) will seemingly result in aircraft beginning their turns before the shoreline, which is not consistent with current noise abatement policy in place for more than the past 30 years. This

potential increase in early turns will lower the compliance rate and cause nearby residents to notice more aircraft overflights and noise. Therefore, LAWA requests that FAA revise the proposed procedures to ensure aircraft do not initiate their turn prior to the shoreline when using the new departure procedures to maintain consistency with said policy.

Another noise concern is associated with the STHBY departure procedure, where new waypoints will result in jet aircraft flying closer to the coastline around the South Bay and Palos Verdes Peninsula. In addition, it would potentially affect southbound turboprop aircraft, currently flying offshore, to also fly closer to or over the Peninsula to maintain the required separation between jets and turboprops. This will result in residents noticing more flight activity and associated noise. For the past twenty years, LAWA, in collaboration with the FAA and the Roundtable, has made notable efforts to reduce and minimize aircraft flying over this area and does not want to see this progress eroded. FAA should relocate the new waypoints and/or use existing waypoints for that route segment so that departures fly farther away from the Peninsula.

LAWA understands that the purpose of the two new flight procedures is to address issues during nighttime Over-Ocean air traffic configuration. However, the KYLOW One Departure chart includes a vague notation restricting the use during noise abatement procedures, while the STHBY ONE procedure does not have any notation regarding this restriction. To be consistent with the intention of using these procedures only during nighttime Over-Ocean Operations to improve safety and efficiency, LAWA requests both flight procedures include the specific notation *"For use only when nighttime noise abatement procedures are in effect."*

LAWA is aware that FAA issued Categorical Exclusions for these proposed procedures, which does not require public notification and input. However, LAWA believes FAA should still reach out to potentially affected communities, such as the City of El Segundo, to inform the public about the potential aircraft flight and noise implications associated with implementing these procedures and afford the public the chance to provide the FAA with feedback.

Thank you for the opportunity to share our concerns, which were also submitted via the IFP Information Gateway and included more technical comments that were shared with the Western Flight Procedures Team. LAWA requests FAA make efforts to address these potential issues with the proposed flight procedures, provide careful and thorough consideration of these requests, and incorporate changes into the flight procedures prior to implementation. We appreciate the recent discussion with FAA representatives regarding these issues and look forward to engaging more fully regarding the STHBY ONE and KYLOW ONE proposed departure procedures and to FAA's continued support over the years of LAWA's noise abatement efforts.

If you have any questions regarding this matter, please contact Kathryn Pantoja, Airport Environmental Manager, via email at kpantoja@lawa.org or by phone at (424) 646-6501.

Mr. Amend
Federal Aviation Administration
December 12, 2022

Sincerely,

Samantha Bricker

Samantha Bricker
Chief Sustainability and Revenue Management Officer

SB:KP:OS

CC: Mark McClardy