

March 1, 2019

Mr. Daniel K. Elwell Acting Administrator Federal Aviation Administration 800 Independence Avenue SW Washington, DC 20591

Re: Request for Proposed PL 115-254 Section 175 Review of Departure Flight Procedures at Van Nuys Airport

Dear Administrator Elwell:

We formally request that the Federal Aviation Administration (FAA) undertake a review of new area navigation (RNAV) flight procedures at Van Nuys Airport (VNY) consistent with Section 175 of Public Law 115-254, signed into law on October 5, 2018.

The FAA implemented RNAV departure procedures at Van Nuys Airport (VNY) in Los Angeles, California, in 2018. These new departure procedures resulted in the establishment of waypoint PPRRY, where aircraft departing VNY to the south using the RNAV procedures turn heading toward the southeast or southwest. Before the RNAV departure procedures were implemented, the legacy conventional procedures directed that these turns be initiated at 2.2 DME from VNY, which is approximately 0.6 nautical miles north of PPRRY.

As a result of the RNAV procedures with the PPRRY waypoint, departing aircraft are starting their initial turn farther to the south, and aircraft are now flying over noise-sensitive communities south of previous flight paths. Under the conventional procedures, the large majority of turns occurred over the Sepulveda Flood Basin, and aircraft turning over the Sepulveda Flood Basin did not affect noise-sensitive communities to the extent that is now common with the RNAV procedures. Numerous community members have raised significant concerns regarding community noise impacts and safety as a result of these RNAV procedures; in fact, noise complaints have increased from an average of 18 individuals per month pre-Metroplex to approximately 300 individuals in January of this year.

We have consulted with the affected community regarding these changes. A motion from the Van Nuys Airport Citizens Advisory Council was approved requesting that the waypoint be moved back to the 2.2 DME location. In addition, the Los Angeles City Council unanimously approved a

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Deborah Flint Chief Executive Officer



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motion seeking that Los Angeles World Airports (LAWA) request that the FAA undertake a Section 175 process, while taking into account the potential noise impacts of any new procedure.

Based on the noise and safety concerns that have been raised and this public consultation, we request that the FAA undertake a review of these procedures consistent under Section 175. We request that FAA analyze flight track dispersion options with the goal of restoring the point for initiation of turns to a point as close to the legacy 2.2 DME point as possible, as this turning location did not generate the noise complaints that the new waypoint has generated. Pursuant to the action of the Los Angeles City Council, we also request that you take into account the potential noise impact of any new departure procedures before they are implemented.

LAWA would be happy to work with the FAA technical staff to share data compiled on this issue. If you have further questions, please do not hesitate to contact me or Michelle D. Schwartz, LAWA's Chief of External Affairs and Deputy Executive Director at mschwartz@lawa.org or (424) 646-5002.

Sincerely,

Deborah Flint

Chief Executive Officer

CC: Mayor Eric Garcetti

Councilmember Nury Martinez
Councilmember Paul Koretz
Councilmember David Ryu

Councilmember Paul Krekorian

U. S. Representative Brad Sherman

FAA Associate Administrator Kirk Shaffer

FAA Regional Administrator Raquel Girvin

Board of Airport Commissioners