



Los Angeles  
World Airports

October 24, 2018

Mr. Paul Litke  
Acting Director, Air Traffic Operations  
Federal Aviation Administration  
Western Service Center - AJTW  
2200 S. 216<sup>th</sup> St  
Des Moines, WA 98198-6547

LAX

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Deborah Flint  
Chief Executive Officer

Dear Mr. Litke:

Los Angeles World Airports (LAWA) is committed to maintaining strong relationships with our neighboring communities, in part by ensuring that noise disruptions from aircraft operations are addressed whenever possible. FAA Metroplex procedures for LAX North Downwind Arrivals, implemented in 2017, have led to increased noise in certain communities caused by concentrations of air traffic that at times are further magnified by lower flying aircraft.

In 2015, the FAA discontinued two LAX Charted Visual Flight Procedures (CVFP) - the Stadium Visual Rwy 24L/R (Stadium CVFP), and Harbor Visual Rwy 25L/R (Harbor CVFP), due to apparent low usage and the removal of a referenced visual landmark. These procedures required arriving aircraft to follow the Santa Monica 068 degree radial on the downwind leg and remain at 5,000 feet or above until passing the LAX 009 degree radial. These procedures also identified minimum altitudes when initiating their turns to final and where to make those turns, all in an effort to keep aircraft at higher altitudes and over fewer residential areas where possible.

I am writing to request that the FAA evaluate the feasibility of implementing new CVFPs that would address the current issue of lower flying aircraft by establishing minimum altitudes at specific points for aircraft flying visual procedures over communities as they arrive at the airport. Since many aircraft descending into LAX still use visual approach, a CVFP could complement and reinforce altitude requirements that are already a part of the Metroplex RNAV arrival procedures (IRNMN, HUULL and RYDRR). Including an existing waypoint from these procedures, such as DAHJR, into the CVFPs would maintain consistency with RNAV procedures and altitude requirements. This would be similar to the existing TIPP TOE VISUAL RWY 28L/R CVFP for San Francisco International Airport (SFO), which includes the waypoint EDDY that is also included in the SERFR RNAV procedure with the same altitude requirement. Both the EDDY and SIDBY waypoints in the SFO CVFP are standalone waypoints and are not near visual landmarks. Therefore, we believe these types of waypoints can be incorporated into new CVFPs developed for LAX. Further, we would want to ensure that any new CVFP procedures do not create any adverse effects to other communities.

I am making this request in accordance with FAA JO 7110.79D, Sections 4 and 5, which invites airport management to request initiation of the process of evaluating CVFPs. LAWA staff has been researching this issue and would like to follow up with you or your



Mr. Paul Litke  
October 24, 2018  
Page 2

designated staff to discuss the evaluation of implementing new CVFPs or any other measures that would mitigate noise from lower flights in this area. I believe this is an opportunity for the FAA to work with LAWA and the community to develop a procedure that would hopefully allow all aircraft to meet the altitude as currently published in RNAV arrivals and address this primary community concern.

I look forward to your favorable reply. For further information or coordination, please contact Samantha Bricker of my staff at [sbricker@lawa.org](mailto:sbricker@lawa.org) or 424-646-5054.

Sincerely,



Deborah Flint  
Chief Executive Officer  
Los Angeles World Airports

cc: Tamara A. Swann, FAA Acting Deputy Regional Administrator  
Samantha Bricker, LAWA Deputy Executive Director  
Kendrick Okuda, Director, LAWA Environmental Programs Group  
Michelle Schwartz, LAWA Chief of External Affairs