

Los Angeles
World Airports
September 4, 2015

SoCal Metroplex Environmental Assessment
Federal Aviation Administration
Western Service Center – Operations Support Group
1601 Lind Avenue SW
Renton, WA 98057

Re: Draft Environmental Assessment (EA) FAA's Proposed Southern California
Optimization of Airspace and Procedures in the Metroplex (SoCal Metroplex)
Project

LAX

LA/Ontario

Van Nuys

City of Los Angeles

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Mayor

Board of Airport
Commissioners

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Vice President

Gabriel L. Estagnier
Jackie Goldberg
Beatrice C. Hsu
Matthew M. Johnson
Dr. Cynthia A. Jones

Deborah Flint
Executive Director

Dear Sir or Madam:

Los Angeles World Airports (LAWA) would like to thank the Federal Aviation Administration (FAA) for extending the public review and comment period for the SoCal Metroplex Project (Project) Draft EA by an additional 60 days. LAWA offers the following comments as feedback on the Draft EA.

LAWA submits these comments in the interest of supporting transparency and facilitating the understanding of complex aviation issues with our local communities, surrounding jurisdictions, elected officials, and the FAA. Although the Draft EA did not identify any significant impacts associated with the proposed actions, LAWA recognizes that some communities may experience changes in the frequency and location of aircraft overflights once the Project is implemented. LAWA recommends that FAA work with those potential communities to ensure they are specifically made aware of this proposed Project. Given the limited information and time to comprehend the information provided in the Draft EA, LAWA believes a number of communities may be affected by the proposed actions and encourages the FAA to engage with these communities and their representatives.

LAWA suggests the FAA consider evaluation of noise metrics adopted and utilized in California. California law mandates use of the Community Noise Equivalent Level (CNEL) for assessing airport noise exposure. For aviation noise analysis, the FAA has determined that the CNEL can be used for FAA aircraft noise evaluations in California, pursuant to FAA Order 1050.1F at A-5 (CNEL may be used in lieu of DNL for FAA actions in California). CNEL is calculated based on noise levels and operational activity occurring during three time periods: daytime (7:00 a.m. to 6:59 p.m.), evening (7:00 p.m. to 9:59 p.m.), and nighttime (10:00 p.m. to 6:59 a.m.). Unlike DNL, CNEL adds weights of 4.77 dBA to events occurring during the evening hours to represent the added intrusiveness of sounds during evening hours. Utilizing the CNEL metric would allow for a more comparative evaluation to existing conditions based on the public's familiarity with the CNEL metric. Additionally, LAWA believes it would be useful for the public to understand the change in frequency of flights associated with the Performance Based Navigation procedures proposed to be implemented under the proposed Project. This information should be presented in the spirit of full disclosure and to understand the full impact of the proposed Project.

LAWA suggests that the FAA present additional information in the Draft EA for the public to readily understand the predicted changes in noise levels, including the actual noise readings from the grid analysis performed. The noise modeling FAA conducted using the Noise Impact Routing System (NIRS) provided magnitudes of change in noise levels for historical/cultural properties. LAWA suggests that such NIRS information be provided for residential areas near any of the SoCal airports in the study area. Furthermore, the Draft EA and the Noise Technical Report should provide additional information on the Proposed Action flight procedures' anticipated usage or its effect on noise levels in underlying communities.

LAWA believes that enhanced communication between the FAA and potentially affected communities on projects like the SoCal Metroplex is vital in our joint efforts to modernize the National Airspace System. Prior to FAA initiating the SoCal Metroplex EA process in early 2014, LAWA and other airport authorities had limited briefings. Airports were not included in the design process, and were not afforded the opportunity to provide input on the proposed procedures. LAWA believes that collaboration with the airports is critical during all project phases of the program's development so that airport authorities can serve as a bridge between the technical stakeholders and the community.

LAWA appreciates FAA's willingness to post additional supplemental information to the FAA SoCal Metroplex website allowing for a much better comparison of the No Action and Proposed Project alternatives, and would only point out that the complete set of graphics for the LAX procedures was posted on August 31, 2015. LAWA believes this type of information is beneficial to all concerned parties and will help potentially affected communities better understand FAA's proposed project.

Should you have additional questions or concerns, please feel free to contact me or Cynthia Guidry, LAWA Deputy Executive Director of Capital Programming, Planning, and Engineering Group at (424) 646-7690.

Sincerely,



Deborah Flint

DAF:SMT:krp

cc: Glenn Martin, FAA
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