



March 5, 2018

Daniel K. Elwell  
Acting Administrator  
Federal Aviation Administration  
U.S. Department of Transportation  
800 Independence Avenue, SW  
Washington, DC 20591

Dear Acting Administrator Elwell:

We have received an unprecedented number of complaints of noise and other negative impacts attributed to increased and shifted aircraft traffic occurring at altitudes below what FAA represented to the community along the Interstate 10 Freeway corridor (SoCal Metroplex Northern Downwind Arrivals), represented by City Attorney Mike Feuer, City Council President Herb Wesson (CD10), Council Member Marqueece Harris-Dawson (CD8), and Council Member Mike Bonin (CD11). Residents, including those who live in predominantly low-income and minority neighborhoods, report that their quality of life has suffered dramatically, just within the last few months.

The purposes of this letter are to request: (1) a meeting as soon as possible with the FAA Regional Administrator and representatives of the Air Traffic Organization regarding how we may work together to address this serious problem as quickly as possible; (2) copies of any pertinent documents that reflect policy decisions, actions, orders, or resolutions (including settlement), which relate to any changes in the altitude levels and flight paths over the City of Los Angeles since SoCal Metroplex was implemented; and (3) that Los Angeles participate in any discussions between the FAA and Culver City regarding flight path and altitude issues.

The complaints appear in part to be caused by aircraft routinely flying below 6,000 feet at the DAHJR waypoint (located at approximately W. Jefferson and S. Redondo Boulevards in the City of Los Angeles) on Northern Downwind Arrivals. FAA's published RNAV procedures require aircraft to fly above 6,000 feet at that location. However, data demonstrate that more than 65% of aircraft have been below that altitude restriction in recent months. We believe our constituents would experience meaningful relief if FAA enforced, unless a deviation is needed for safety, this minimum altitude and ultimately substantially increased it at this waypoint well above 6,000 feet. While we understand that FAA has been discussing changes to improve altitude fidelity, accelerated efforts are critical to address this community need.

The City is also concerned about low flights further east at the GADDO waypoint, roughly located over downtown Los Angeles. As you know, downtown Los Angeles is densely populated and contains some of the tallest and most distinctive buildings in the western United States. There are numerous security and safety concerns related to low flights in and around downtown Los Angeles. If FAA insists on the Northern Downwind Arrival flight path to intrude over downtown, FAA should implement a minimum altitude as high as possible and enforce that restriction.

It is our understanding that despite repeated requests by Los Angeles residents and other participants in the LAX Noise Roundtable for explanations from FAA representatives concerning these issues, FAA has provided vague responses, even suggesting that due to pending litigation, representatives are unable to answer basic questions. FAA's approach to date is not effective or respectful of our communities. Instead, FAA Regional Administrator and representatives of the Air Traffic Organization should meet with us as soon as possible to address these concerns and work quickly to find solutions.

In that same spirit, we would like a representative of the City Attorney's office to participate in any discussions that may yet occur between FAA and Culver City regarding flight paths for LAX. Resolution of Culver City's litigation against FAA and implementation of any changes to the SoCal Metroplex or related flight paths would clearly have a significant impact on Los Angeles. Indeed, there is a high likelihood, if not a certainty, that a change in flight paths will affect more residents of the City of Los Angeles than residents of any other city, effects which will undoubtedly impact the City of Los Angeles for years to come. Moreover, any changes would need to be coordinated with the City of Los Angeles both as the owner of LAX pursuant to FAA Order JO 7100.41A and other orders and as part of the National Historic Preservation Act, National Environmental Policy Act and Section 4(f) of the Department of Transportation Act processes.

For further information or to schedule a meeting, please contact Chief Assistant City Attorney David Michaelson at (213) 978-7195. We look forward to your reply at your earliest convenience.



**MICHAEL N. FEUER**  
City Attorney, City of Los Angeles

Sincerely,



**HERB J. WESSON, Jr.**  
President, Los Angeles City Council



**MIKE BONIN**  
Councilmember, 11<sup>th</sup> District



**MARQUEECE HARRIS-DAWSON**  
Councilmember, 8<sup>th</sup> District

cc: The Honorable Dianne Feinstein, United States Senate  
The Honorable Kamala Harris, United States Senate  
The Honorable Karen Bass, United States House of Representatives  
The Honorable Ted Lieu, United States House of Representatives  
Dennis Roberts, Regional Administrator, FAA, Western-Pacific Division  
Deborah Flint, Chief Executive Officer, Los Angeles World Airports  
Los Angeles City Council Members