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IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT

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CITY OF LOS ANGELES,  
*Petitioner*

v.

DANIEL K. ELWELL, in his official capacity as Acting Administrator, Federal  
Aviation Administration; FEDERAL AVIATION ADMINISTRATION,  
*Respondent*

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On petition for review of an action by the  
Federal Aviation Administration pursuant to 49 U.S.C. § 46110

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**PETITION FOR REVIEW**

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*Counsel for the City of Los Angeles*

Pursuant to 49 U.S.C. § 46110, Rule 15(a) of the Federal Rules of Appellate Procedure, and Circuit Rule 15-1, the City of Los Angeles hereby petitions the United States Court of Appeals for the Ninth Circuit Court for review of the following final orders issued by the Federal Aviation Administration (“FAA”):

(1) FAA’s publication and implementation of its North Downwind approach procedures to the Los Angeles International Airport (“Arrival Routes”) on May 24, 2018. The FAA’s final orders were the final culmination of a series of decisions that are cumulatively documented in schematic drawings of the Arrival Routes attached as Attachments A through C to this Petition:

(A) HUULL TWO ARRIVAL (RNAV), published on May 24, 2018;

(B) IRNMN TWO ARRIVAL (RNAV), published on May 24, 2018;

and

(C) RYDRR TWO ARRIVAL (RNAV), published on May 24, 2018.

(2) FAA’s decision to restrict public comments regarding FAA flight procedures as set forth in a published disclaimer on FAA’s Instrument Flight Procedures (IFP) Information Gateway website, where FAA publishes flight procedures for review and public comment. FAA’s disclaimer prohibits access to its IFP Gateway site unless the user affirmatively acknowledges that FAA will not consider comments

submitted on the Gateway site relating to environmental impacts of proposed flight procedures. Attached as Attachment D is FAA's IFP Information Gateway disclaimer to parties seeking to submit comments on FAA procedures.

Dated: June 21, 2019

Respectfully submitted,

/s/ David Michaelson

**RULE 26.1 DISCLOSURE STATEMENT**

Petitioner City of Los Angeles is a municipal corporation, organized under the provisions of the Los Angeles City Charter, and not a “nongovernmental corporate entity.” Therefore, Petitioner is not required to file a corporate disclosure statement pursuant to Federal Rule of Appellate Procedure 26.1(a).

Dated: June 21, 2019

Respectfully submitted,

/s/ David Michaelson

# **Attachment A**

(HUULL.HUULL2) 18144

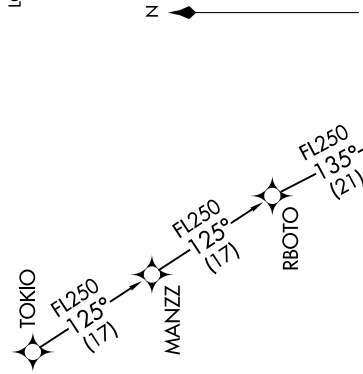
# HUULL TWO ARRIVAL (RNAV)

AL-237 (FAA)

LOS ANGELES INTL (LAX)  
LOS ANGELES, CALIFORNIA

SW-3, 21 JUN 2018 to 19 JUL 2018

SOCAL APP CON  
124.5 235.975  
D-ATIS ARR  
133.8  
LOS ANGELES TOWER  
(N) 133.9 239.3  
(S) 120.95 379.1



## ARRIVAL ROUTE DESCRIPTION

### TOKIO TRANSITION (TOKIO.HUULL2)

From HUULL on track 079° to cross GNZZO between 13000 and 14000, then on track 079° to cross RYDRR at 11000 and at 250K, then on track 103° to cross KEVI at or above 10000, then on track 103° to cross BAYST at or above 9000 and at 240K, then on track 084° to cross JUUSE between 8000 and 9000, then on track 084° to cross CLIFY between 7000 and 8000 and at 210K, then on track 066° to cross DAHJR at 6000 and at 210K, then on track 071° to cross GADDO at 6000, then on track 071° . Expect RADAR vectors to final approach course.

## LOST COMMUNICATIONS

In the event of lost communications: RNP LAX arrivals proceed on the RNAV (RNP) Z RWY 24R approach at DAHJR or proceed on the ILS or LOC RWY 24R..

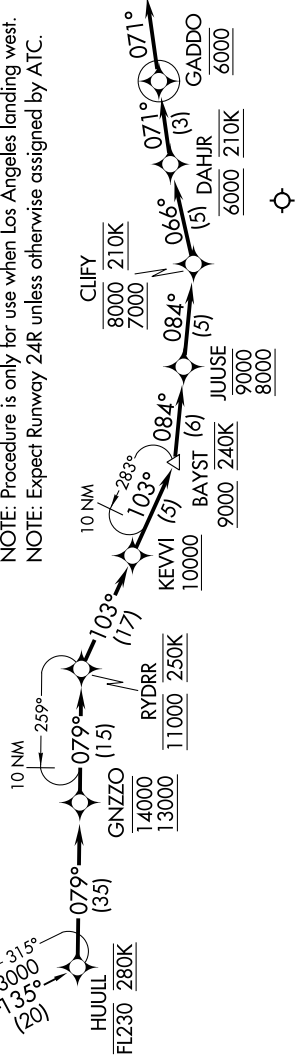
NOTE: RADAR required.

NOTE: RNAV 1.

NOTE: DME/DME/IRU or GPS required.

NOTE: Turbojet aircraft only.

NOTE: Procedure is only for use when Los Angeles landing west.  
NOTE: Expect Runway 24R unless otherwise assigned by ATC.



# HUULL TWO ARRIVAL (RNAV)

(HUULL.HUULL2) 24MAY18

LOS ANGELES, CALIFORNIA  
LOS ANGELES INTL (LAX)

NOTE: Chart not to scale.

SW-3, 21 JUN 2018 to 19 JUL 2018

# **Attachment B**

(IRNMN.IRNMN2)

18144

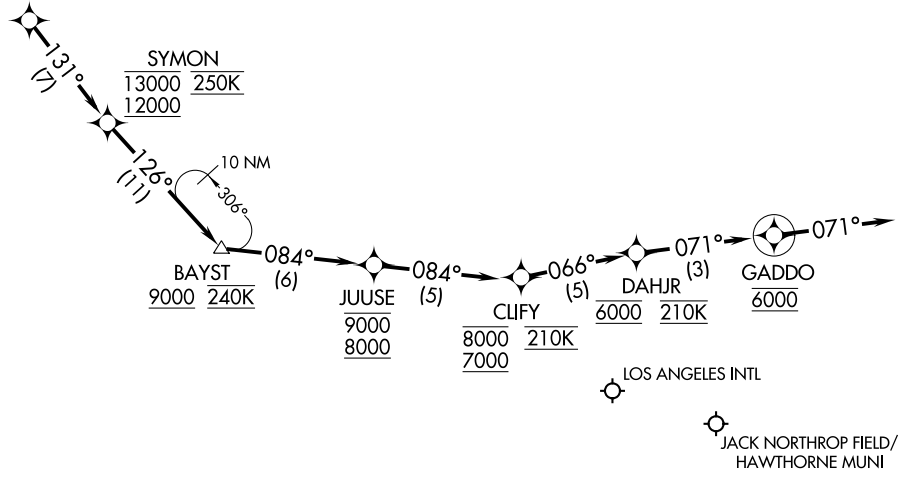
AL-237 (FAA)

# IRNMN TWO ARRIVAL (RNAV) Arrival Routes

LOS ANGELES, CALIFORNIA

SOCAL APP CON  
124.5 235.975  
LOS ANGELES INTL D-ATIS ARR  
133.8  
JACK NOTHRUP FIELD/HAWTHORNE MUNI ATIS  
118.4  
LOS ANGELES TOWER  
(N) 133.9 239.3  
(S) 120.95 379.1  
HAWTHORNE TOWER \*  
121.1 257.8

IRNMN  
16000  
12000



SW-3, 21 JUN 2018 to 19 JUL 2018

SW-3, 21 JUN 2018 to 19 JUL 2018

- NOTE: RADAR required.
- NOTE: RNAV 1.
- NOTE: DME/DME/IRU or GPS required.
- NOTE: Turbojet aircraft only.
- NOTE: Procedure is only for use when Los Angeles landing west.
- NOTE: Expect Rwy 24R unless otherwise assigned by ATC.

NOTE: Chart not to scale.

## ARRIVAL ROUTE DESCRIPTION

LANDING KLAX/KHHR: From IRNMN on track 131° to cross SYMON between 12000 and 13000 and at 250K, then on track 126° to cross BAYST at or above 9000 and at 240K, then on track 084° to cross JUUSE between 8000 and 9000, then on track 084° to cross CLIFY between 7000 and 8000 and at 210K, then on track 066° to cross DAHJR at 6000 and at 210K, then on track 071° to cross GADDO at 6000, then on track 071°. Expect RADAR vectors to final approach course.

## LOST COMMUNICATIONS

In the event of lost communications proceed on the RNAV (RNP) Z RWY 24R approach or the ILS or LOC RWY 24R.

# IRNMN TWO ARRIVAL (RNAV) Arrival Routes

LOS ANGELES, CALIFORNIA

(IRNMN.IRNMN2) 24MAY18



# **Attachment C**

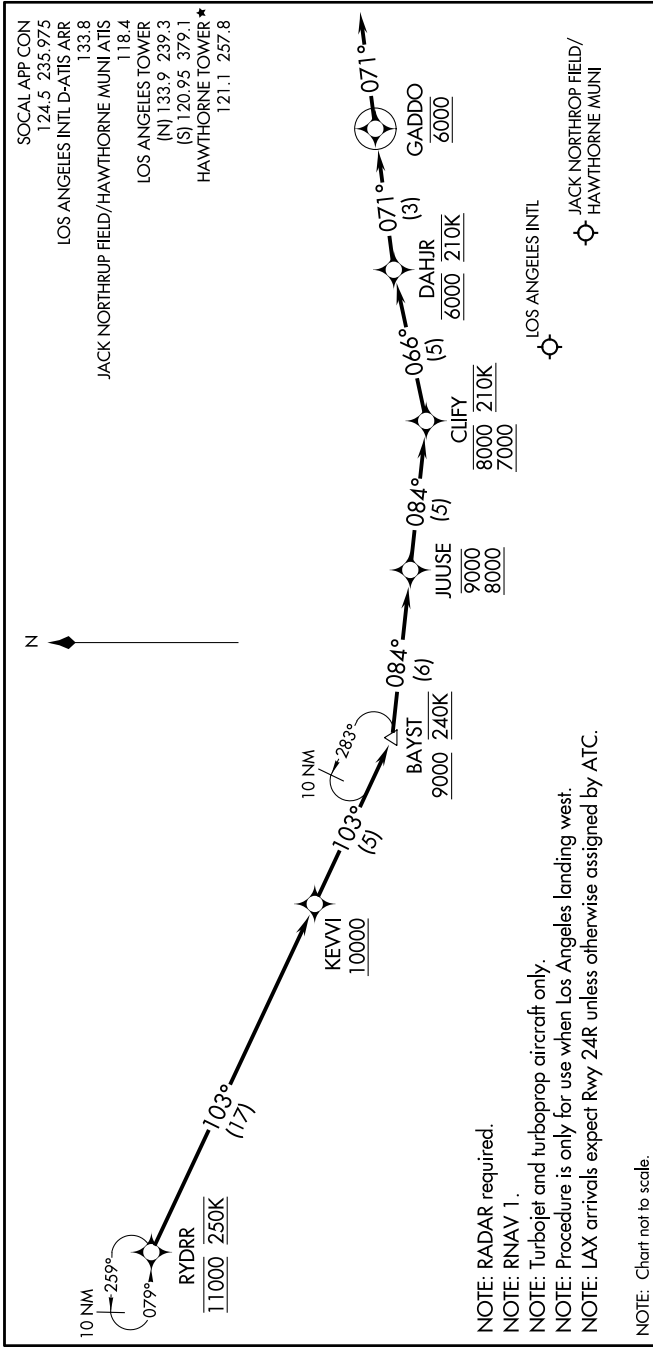
(RYDRR.RYDRR2) 18144

AL-237 (FAA)

**RYDRR TWO ARRIVAL (RNAV) Arrival Routes**

LOS ANGELES, CALIFORNIA

SW-3, 21 JUN 2018 to 19 JUL 2018



NOTE: RADAR required.  
 NOTE: RNAV 1.  
 NOTE: Turbojet and turboprop aircraft only.  
 NOTE: Procedure is only for use when Los Angeles landing west.  
 NOTE: LAX arrivals expect Rwy 24R unless otherwise assigned by ATC.  
 NOTE: Chart not to scale.

**ARRIVAL ROUTE DESCRIPTION**

LANDING KLAX/KHHR: From RYDRR on track 103° to cross KEVVI at or above 10000, then on track 103° to cross BAYST at or above 9000 and at 240K, then on track 084° to cross JUUSE between 8000 and 9000, then on track 084° to cross CLIFY between 7000 and 8000 and at 210K, then on track 066° to cross DAHJR at 6000 and at 210K, then on track 071° to cross GADDO at 6000, then on track 071°. Expect RADAR vectors to final approach course.

LOST COMMUNICATIONS  
 In the event of lost communications: RNP LAX arrivals proceed on the RNAV (RNP) Z RWY 24R approach at DAHJR or proceed on the ILS or LOC RWY 24R.

SW-3, 21 JUN 2018 to 19 JUL 2018

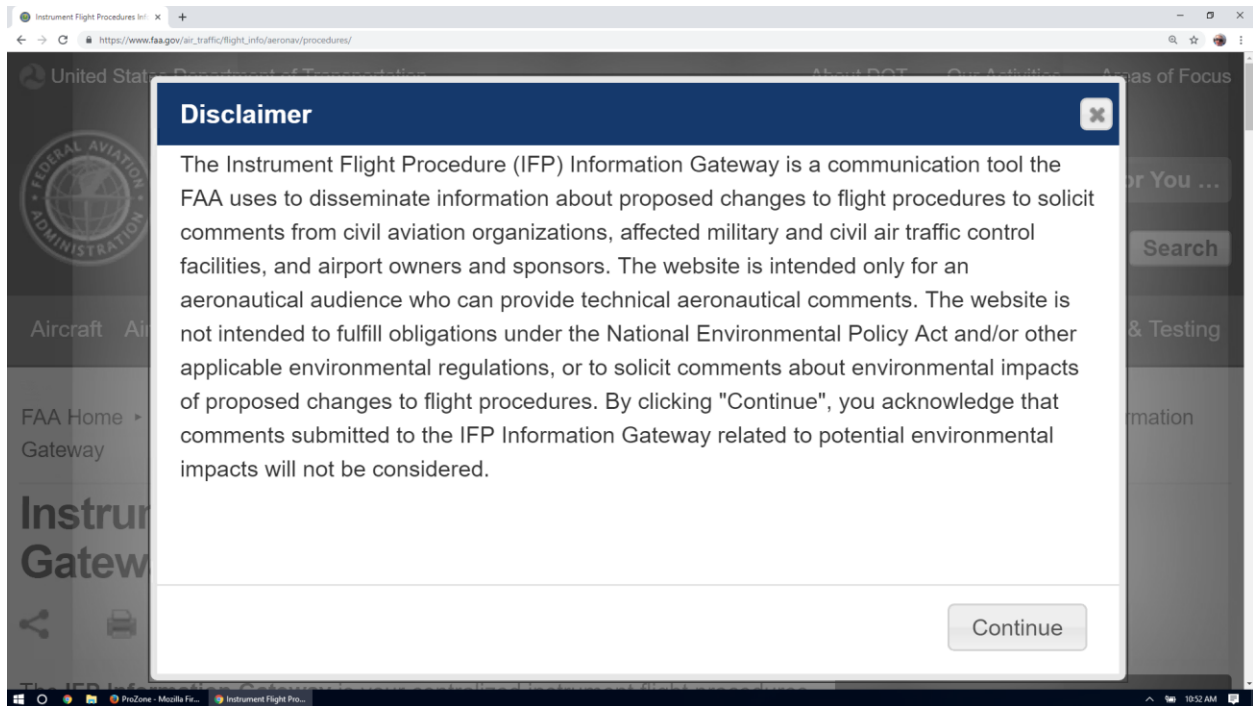
**RYDRR TWO ARRIVAL (RNAV) Arrival Routes**

LOS ANGELES, CALIFORNIA

(RYDRR.RYDRR2) 24MAY18

# **Attachment D**

[https://www.faa.gov/air\\_traffic/flight\\_info/aeronav/procedures/](https://www.faa.gov/air_traffic/flight_info/aeronav/procedures/)



## CERTIFICATE OF SERVICE

I hereby certify, in accordance with Federal Rule of Appellate Procedure 15(c), that on June 21, 2019, a true and correct copy of the foregoing was served by certified U.S. mail and electronic mail on the following:

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/ s / Paulette Jones