

Los Angeles Area Helicopter Noise Coalition Comments – May 14, 2015

on the *FAA Significant Progress Report on the Los Angeles Helicopter Noise Initiative*

EXECUTIVE SUMMARY

In response to the *FAA Significant Progress Report on the Los Angeles Helicopter Noise Initiative*, January 16, 2015, the Los Angeles Area Helicopter Noise Coalition (LAAHNC) prepared this document to explain why we feel that significant progress has not been achieved. The document provides an Executive Summary overview followed by our specific comments on the FAA report (highlighted as *blue italicized text*).

LAAHNC Background

LAAHNC is a coalition comprising community stakeholders across broad geographical sections of Los Angeles County. Our board members are shown below. Our bipartisan mission is to recover and improve the quality of life throughout Los Angeles County by reducing helicopter noise in our communities, without compromising safety. We are committed to partnering with local neighborhoods and working with appropriate government agencies, helicopter pilots and operators, and other entities to enhance the environmental quality of our neighborhoods today and for future generations.

George Abrahams Beachwood Canyon Neighborhood Association	Gerry Hans Friends of Griffith Park	Donna Sievers Bluff Heights (Long Beach) Neighborhood Association
Bob Anderson Sherman Oaks Homeowners Association	David Rankell Van Nuys Airport Citizens Advisory Council	Gerald A. Silver Homeowners of Encino
John Bailey Southeast Torrance Homeowners Association	Richard Root Citizens for Quiet Helicopters (Torrance)	Rudy Whitcomb Rolling Hills Estates
Dave Garfinkle Tarzana Property Owners Association	Mike Savidan Councilman, City of Lomita	Wayne Williams Van Nuys Airport Citizens Advisory Council

LAAHNC members have participated in 55 major and working group meetings with the FAA and pilot stakeholders since December 2012. We have proposed methods for reducing helicopter noise and worked with pilots and the FAA to understand the County's complicated airspace. In spite of intensive efforts, we have been unable to reach voluntary agreements that would bring substantial noise reductions in helicopter noise to any region in Los Angeles County and we do not believe such agreements are achievable in the foreseeable future.

LAAHNC Progress Assessment

LAAHNC appreciates the FAA's efforts to promote industry self-regulation to reduce helicopter noise. However, we strongly disagree with the FAA position that significant progress has been achieved. Our position is summarized in the table below, which assesses progress against the six actions in the Consolidated Appropriations Act, 2014, Pub. L. No. 113-76 (Jan. 3. 2014).

Actions from Consolidated Appropriations Act, 2014, Pub. L. No. 113-76	LAAHNC Assessment of Progress Against Action
1. Evaluate and adjust existing helicopter routes above Los Angeles, and make adjustments to such routes if the adjustments would lessen impacts on residential areas and noise-sensitive landmarks	No Safety Risk Management (SRM) evaluations have been done and the FAA has identified no feasible route modifications to date that could or would lessen noise impacts, therefore no significant progress has been achieved.

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Actions from Consolidated Appropriations Act, 2014, Pub. L. No. 113-76	LAAHNC Assessment of Progress Against Action
2. Analyze whether helicopters could safely fly at higher altitudes in certain areas above Los Angeles County	The FAA has neither initiated nor completed any Safety Risk Management analyses to determine where helicopters could fly at higher altitudes, therefore no significant progress has been made.
3. Develop and Promote best practices for helicopter hovering and electronic newsgathering	Pilot and community stakeholders have agreed on no countywide best practices for hovering and newsgathering helicopters, therefore no significant progress has been made.
4. Conduct outreach to helicopter pilots to inform them of voluntary policies and to increase awareness of noise sensitive areas and events	Pilot and community stakeholders have agreed on no collaborative pilot outreach activities and methods, therefore no significant progress has been made.
5. Develop a more comprehensive noise complaint system	The FAA began operating the new Automated Complaint System on April 1, 2015 and is beginning to collect helicopter complaints across Los Angeles County; this represents initial progress in data collection, but does not in itself reduce helicopter noise.
6. Continue to participate in collaborative engagement between community representatives and helicopter operators	The FAA has participated and tried to foster engagement between pilot and community stakeholders, but the engagement was never truly collaborative and stakeholders never reached any significant agreements. While the required action has taken place, no significant progress has been made.

LAAHNC Outlook

The community stakeholder outlook is quite different from that of the FAA. Helicopter noise has been an ongoing problem in the United States for decades. In the late 1970s, the FAA issued proposed regulations to address the problem, but withdrew its proposed rules with the understanding that the helicopter industry would implement a voluntary noise abatement program. This industry-based voluntary approach has not resolved the problem. LAAHNC members have been trying to get the industry to voluntarily mitigate helicopter noise in the Los Angeles area for years, yet the noise impacts have steadily increased. It is unrealistic to expect the industry to effectively regulate itself.

We were optimistic that under the FAA's Los Angeles Helicopter Noise Initiative, progress would be made. However, even with our intensified attempts to collaborate over the past couple of years and with stakeholders working under a Congressional mandate, we could not get close to an agreement on voluntary measures.

We question the value of continued collaboration in an attempt to reach voluntary agreements that are clearly not attainable. Unless helicopter pilots are willing to significantly modify their positions and agree to voluntary measures that would truly reduce noise, there is no point in prolonging collaboration. LAAHNC board members believe that since no significant progress has been made, the Secretary should begin the regulatory process as called for in the Act passed in January 2014.

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LAAHNC COMMENTS ON FAA SIGNIFICANT PROGRESS REPORT

Background: The May 2013 Report

Helicopter noise in the greater Los Angeles region has been a concern for residents for many years. In response to those concerns, the Federal Aviation Administration (FAA) solicited input from local communities and other stakeholders on helicopter noise and safety issues. On May 31, 2013, the FAA published the “Report on the Los Angeles Helicopter Noise Initiative.”

In the report, the FAA expressed that the most satisfactory and widely accepted noise abatement measures are those developed by engaged stakeholders and the FAA at the local level and supported by local consensus. The FAA recommended engaging in a robust local process and is supporting such a process to pursue remedies aimed at reducing helicopter noise that are responsive to community quality-of-life and economic interests and are consistent with National Airspace System (NAS) safety and efficiency.

The Consolidated Appropriations Act of 2014

In January 2014. Congress included language in the Consolidated Appropriations Act, 2014, Pub. L. No. 113-76 (Jan. 3. 2014), directing the FAA to undertake six actions, which were previously identified in the May 2013 Report:

- 1) Evaluate and adjust existing helicopter routes above Los Angeles to lessen noise impacts;
- 2) analyze whether helicopters could fly safely at higher altitudes;
- 3) develop and promote best practices for helicopter operators for limiting noise;
- 4) conduct outreach to helicopter operators on voluntary policies and increase awareness of noise sensitive areas and events;
- 5) work with stakeholders to develop a more comprehensive noise complaint system; and
- 6) continue to participate in collaborative engagement between community representatives and helicopter operators.

The legislation also stated that within one year of enactment, the Secretary “shall begin a regulatory process related to the impact of helicopter use on the quality of life and safety of the people of Los Angeles County unless the Secretary can demonstrate significant progress in undertaking the actions.”

LAAHNC: In our comments, references to the “Act” mean the Consolidated Appropriations Act, 2014, Pub. L. No. 113-76 (Jan. 3. 2014).

FAA has worked diligently for more than a year with various stakeholders to implement these six actions and significant progress has been made on each one, as demonstrated in this report. FAA believes that these efforts are producing positive results and will continue to work through the collaborative process.

Significant Progress

FAA and the stakeholder working groups have made significant progress on each of the six actions over the past year.

LAAHNC: As explained in our further comments that follow, we agree that some progress has been made on a couple of supportive activities. However, no significant progress has been made on actions that are essential to reducing noise.

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Action 1: Evaluate existing helicopter routes to identify feasible modifications that could lessen impacts on residential areas and noise-sensitive landmarks.

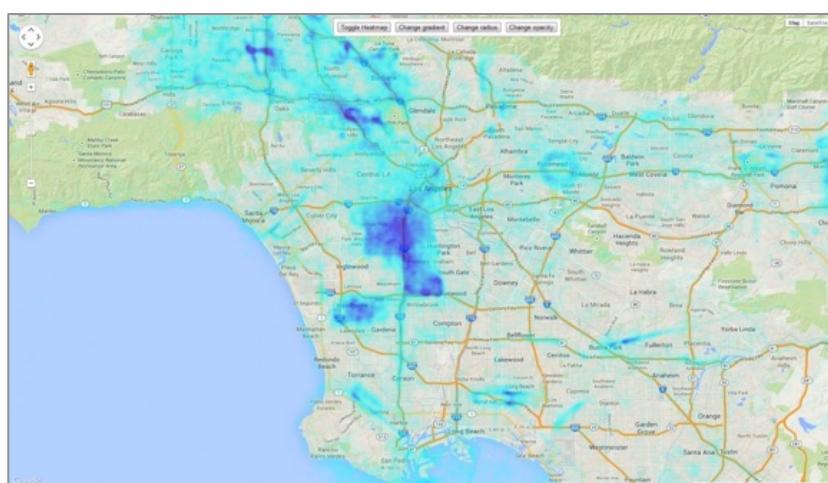
The FAA has expended significant resources to analyze how helicopters integrate into the complex airspace of Los Angeles County, including developing new methodology and tools to identify helicopter flight tracks. Gaining a better understanding of existing helicopter operations was a necessary first step in evaluating existing helicopter routes, and the FAA shared its work-in-progress with stakeholders through detailed briefings and working group sessions. With this foundation, the FAA and stakeholders are making progress in identifying route adjustments that could lessen impacts on residential areas and noise-sensitive landmarks while avoiding shifting noise from one residential neighborhood to another.

LAAHNC: We agree the FAA has expended resources and that there have been many meetings, but do not believe that the resources and meetings have produced significant progress. The exact wording in the Act directs the FAA to “evaluate and adjust existing helicopter routes above Los Angeles …” While the helicopter flight track data developed by the FAA was informative and helped all participants better understand the number of helicopter flights in specific local areas of Los Angeles County, it did not constitute “evaluations” as to whether helicopter routes could be adjusted, except in one small area of the Cahuenga Pass where the FAA gave a preliminary opinion that routes changes would be very difficult, if not impossible, to adjust to reduce noise. On page 4 of their May 31, 2013 Report to Congress, the FAA stated they would have to conduct Safety Risk Management (SRM) studies in connection with route adjustments. However, they have not done any such studies in connection with the effort noted in their current report. Finally, we respectfully disagree with the FAA’s characterization that stakeholders are making progress. With the exception of minor changes to a single local route in Long Beach, the pilot and community stakeholders continue to remain far apart on route adjustments. It is very straightforward – no routes have been evaluated, no route adjustments have been made to date, and as far as we know none are planned in the near future. This is not significant progress.

Achievements:

- Conducted analysis throughout the entire Los Angeles County to determine where helicopters are currently operating.

LAAHNC: The only countywide data that we are aware of is a single helicopter “heat map” shown below that illustrated only broad traffic concentrations across the county in August 2013. This is interesting information but does not constitute any sort of detailed “analysis” that provides useful data for adjusting routes or reducing helicopter noise.



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- Formulated a county-wide density map that depicts concentration of helicopter activities
- Developed an algorithm to differentiate fixed-wing and helicopters operating under visual flight rules

LAAHNC: We appreciate the FAA's effort in developing algorithms. However, we have concerns about their accuracy in identifying all helicopter flights. The FAA did not respond to our request to convert flight tracks to numbers of flights. Without those numbers, we are unable to verify the accuracy of the flight track data against our own personal observations. In addition, the FAA's algorithm-based analyses depict helicopter altitude above mean sea level (MSL). One very recent analysis depicted altitude above ground level (AGL) and this was truly useful to community stakeholders. We appreciate that pilots tend to think in terms of altitude MSL, but the FAA must understand that the public is only concerned about how high a noisy helicopter is flying above their house. Therefore, analysis results should be depicted in altitude AGL.

- Developed voluntary beacon codes to enhance safety by distinguishing helicopters from fixed-wing aircraft and increasing situational awareness of pilots and air traffic controllers.

LAAHNC: We continue to feel that the FAA's decision to use discrete beacon codes for helicopters was a good idea. This was one of the few issues on which all stakeholders, including helicopter operators, agreed. The FAA put the new voluntary beacon codes into effect on September 1, 2014. However, it appears that most pilots are not complying with these voluntary codes. A notice on the "Investigate with WebTrak" screen of the new helicopter Automated Complaint System (ACS) currently states "Some helicopters might be missing from this site until more helicopters in the region fully adopt helicopter specific beacon codes." In other words, many pilots are not using the new voluntary beacon codes. Based on our own recent comparisons between flight tracks on local airport WebTraks and the new ACS WebTrak, we feel that only about 25 percent of actual helicopter flights appear on the new helicopter ACS WebTrak. This illustrates the difficulty of getting pilots to comply with simple voluntary measures, let alone more complicated voluntary flight measures. Again, we acknowledge the FAA's efforts creating and publishing the new beacon codes, but this system needs improvement.

- Completed extensive in-depth analysis of adherence to existing helicopter routes and potential for route adjustments for the Hollywood, Torrance, and Palos Verdes areas; similar analysis is underway in the Long Beach area.

LAAHNC: Regarding the Cahuenga Pass-Hollywood area, if pilots simply adhered to the published routes on the existing helicopter route chart (in this area, flying above the Hollywood Freeway), helicopter noise might be greatly reduced. But, they don't. The FAA's own flight analyses of this area illustrate significantly more helicopter flights over areas that are not on charted helicopter routes. For example, pilots often cut the corners and fly over residential areas. When we question pilots about using the route chart, we are rebuffed and told it is not always possible or practical. In actuality, this route chart presents an in-place voluntary measure for helicopter pilots, and they continue to ignore it – further illustrating why we are becoming more and more skeptical about any potential effectiveness for voluntary measures to reduce helicopter noise. And, why we don't feel that there has been significant progress for this action.

- Provided stakeholder briefings to review and explain the results of the in-depth analysis.
 - 5/8/2014: Residents/operators explaining the process used on the Torrance Safety Risk Management analysis
 - 8/27/2014: South Bay community workgroup on initial analysis
 - 8/29/2014: Cahuenga Pass workgroup on helicopter/fixed-wing operations

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- 9/16/2014: Long Beach Routes workgroup on finalized analysis
- 9/17/2014: Best Practices workgroup on how the National Airspace System operates and the relationship to flight procedures
- 9/24/2014: South Bay community workgroup on FAA Safety Process
- 9/29/2014: Cahuenga Pass workgroup on fixed-wing aircraft through the Hollywood region of interest
- 11/13/2014: South Bay community workgroup on finalized analysis
- 12/3/2014: Cahuenga Pass workgroup on FAA subject matter expert recommendations

LAAHNC: It is interesting to note that one of the above noted recommendations, made by Clark Desing, FAA Operations Support Group Manager, included “Stay on routes when practical”. Mr. Desing understands that many helicopter pilots fail to adhere to recommended voluntary routes, and felt that this simple recommendation could help alleviate noise. Yet, pilots continue to ignore the existing voluntary helicopter route charts.

- Identified potential new voluntary off-shore routes based on analysis of coastal air traffic and stakeholder input; design of those routes is underway.

LAAHNC: We proposed the creation of offshore routes and appreciate the FAA’s willingness to consider establishing them. However, in multiple meetings, pilots have made it abundantly clear that they would not comply with the specific voluntary offshore routes that the FAA was considering (see Attachment 1, an LAAHNC off-shore route position paper that discusses the specific proposals). It seems pointless to establish voluntary offshore routes on paper that pilots would ignore in practice. This again calls into question the effectiveness of pilot compliance with any voluntary measures. At the present time, it appears that the only way to get pilots to comply with offshore routes would be to make them mandatory, not voluntary. Thus, although we commend the FAA’s efforts to analyze and establish voluntary offshore routes, we cannot consider this to be significant progress if pilots refuse to follow them.

Action 2: Analyze whether helicopters could safely fly at higher altitudes in certain areas along helicopter routes and at specific identified areas of concern.

The FAA has combined work under Actions 1 & 2 to increase efficiency and leverage resources. In conjunction with its evaluation of routes, the FAA has begun to analyze options to safely raise altitudes and reduce impacts on communities. Adjusting the altitudes for helicopter traffic is an extremely difficult task given the busy airspace within Los Angeles County. The substantial analysis for Action 1 provides a foundation for identifying altitude adjustments along routes and over noise sensitive areas.

LAAHNC: Again, the “analysis” that must be completed is a Safety Risk Management (SRM) study. We have requested that areas be identified where helicopters cannot safely fly at altitudes of at least 2,000 feet above ground level (AGL) (see Attachment 2, an LAAHNC altitude position paper that further discusses this issue). We selected the 2,000 foot AGL altitude based on FAA Advisory Circular 91-36D (see Attachment 3, the FAA Advisory Circular). The simple fact is that subsequent to the passage of the Act in January 2014, no SRM analysis has yet been done to determine whether or not helicopters could safely fly higher in any area of concern anywhere in Los Angeles County. This is not significant progress.

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Achievements:

- Used the in-depth analysis of helicopter operations conducted to evaluate route modifications to support discussion of altitude adjustments in those areas.

LAAHNC: Raw flight track data has been provided and that is a start, but there has been no in-depth analysis of that data of the type needed to support altitude adjustments. This does not represent significant progress.

- Provided data to the pilot community with recommendations to adjust altitudes where operations would safely allow.

LAAHNC: We were not aware that the FAA has made recommendations to the pilot community concerning any helicopter altitude adjustments. We would like to see these recommendations to determine if we would concur with them.

- Conducted a Safety Risk Management (SRM) analysis of the city of Torrance proposed changes to Zamperini Field helicopter arrival/departure routes. FAA issued the SRM Decision Memorandums on the following routes:

- West Pacific Coast Highway
 - Raised altitude from 600 feet (ft.) MSL to 900 ft. MSL
- South Crenshaw
 - Raised altitude from 600 ft. MSL to 2,000 ft. MSL
 - Modified Route
- Southeast
 - Raised altitude from 600 ft. MSL to 1,000 ft. MSL

LAAHNC: The SRM studies conducted on three Torrance Airport helicopter routes were done prior to the passage of the Act in January 2014. In 2009, the Torrance community requested that helicopter routes be raised to 2,000 feet above ground level (AGL) in accordance with FAA Advisory Circular 91-36D (provided in Attachment 3). In February 2011, the City of Torrance also requested that the FAA consider approving higher routes. The FAA did the SRM studies in the summer of 2013. They evaluated altitudes lower than those requested by the City or sought by the community. Under the FAA Decision Memos, helicopter routes would be as low as 700 to 800 feet AGL. Nearly all helicopters in the area were already flying these routes at much higher altitudes than those evaluated in the SRM. So, on paper, while the SRM altitudes appear to be an improvement, in reality, they would not have resulted in any actual helicopter noise reduction. These altitudes would not have been acceptable to the community, and have never been implemented. Our position is that the SRM-analyzed routes could potentially be worse than maintaining the status quo. Therefore, we would not characterize this effort as an achievement in reducing noise under the Act, nor any sort of progress whatsoever.

Conducted analysis of helicopter and fixed-wing aircraft at various altitudes in multiple areas, a necessary step before adjusting routes or altitudes.

LAAHNC: We appreciate the major FAA effort that went into this analysis. However, in the Cahuenga Pass-Hollywood Region of Interest (ROI), we never received a reasonable explanation of why helicopters could not fly higher, except that the analysis showed that helicopters are already sharing that airspace with fixed-wing aircraft. And again, no routes have actually been adjusted, so this does not yet represent significant progress.

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Action 3: Develop and Promote best practices for helicopter hovering and electronic news gathering.

The FAA has collaborated with community representatives and helicopter operators to identify and promote existing best practices to reduce noise. We will continue to issue Advisory Notices to Airmen (NOTAMs) for large events and encourage helicopter operators and news organizations to employ practices that reduce noise. As we obtain more insight into the location and nature of helicopter noise problems throughout the Los Angeles area we will continue to work with stakeholders to identify additional best practices targeted to those areas and events.

LAAHNC: While we appreciate that pooling for a few pre-planned events has been encouraged, the problem is the competitive nature of the news-gathering organizations to arrive at the scene first, and their poor use of discretion in deciding whether remain at that scene for prolonged periods of time, i.e., hovering. The best and most recent example is news helicopters that flew over homes where a mountain lion (P22) was scared to death and hunkered down under a house. At least two helicopters persisted at the scene – where there was nothing to see whatsoever (the mountain lion was under the house) – for four hours, according to local homeowners.

Pooling is a prime example of lack of helicopter industry follow through on what we thought could become agreed-to voluntary measures. As a result of extremely numerous complaints concerning Carmageddon 1 and discussions at the Best Practices Working Group, the helicopter news industry agreed to fly higher when covering events, to limit hovering time at events, and to pool information, thereby limiting the number of on-site helicopters. We have documented dozens of examples where these “voluntary agreements” have been totally ignored. Examples include low-altitude, multi-hour, multi-helicopter coverage of the water pipe rupture on Sunset Boulevard near UCLA; an incident in Hollywood on October 23, 2014 where a CBS News helicopter hovered over a private house for several hours because they were “instructed” to wait for a shot of Taylor Swift who was doing a Jimmy Kimmel concert on Hollywood Boulevard; a standoff between police and a criminal suspect in the Winnetka area of the San Fernando Valley; and coverage of a several-mile-long funeral procession in the areas of the 101 and 170 freeways. This again exemplifies a lack of continuing commitment on the part of news media that direct their helicopter pilots, and further raises our skepticism about the effectiveness of voluntary measures. Efforts on this action to date do not represent even minimal progress, and certainly do not constitute significant progress.

Achievements:

- Worked with stakeholders to promote camera pooling for electronic news gathering helicopters to limit operations during major events.
 - Carmageddon II
 - Space Shuttle Endeavour
 - Jamzilla

LAAHNC: These were all pre-planned, infrequent, one-time events. The same is not true for unplanned events.

- Issued advisory NOTAMs requesting pilots to avoid overflying or hovering.
 - 2012 Hollywood Bowl concerts
 - 2013 Hollywood Bowl concerts

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- 2014 Coachella Music Festival

LAAHNC: This venue is outside of Los Angeles County and is of minimal concern to us.

- Enhanced efforts for the Hollywood Bowl 2014 Concert Season:

- Issue a graphic notice for the 2014 Hollywood Bowl season.
- Issued Letters to Airman regarding the noise sensitive location.
- Instituted the issuing of information on the Automatic Terminal Information Service at major airports in Los Angeles County for pilot awareness.

- Engagement from local stakeholders to enhance and promote best practices:

- Local law enforcement identified opportunities to fly neighborly when operations permit.

LAAHNC: Routine law enforcement patrols, often at altitudes under 700 feet AGL, are a major source of helicopter noise in many residential areas. Better surveillance equipment would allow higher altitude routine patrols except when law enforcement is responding to an active event. Law enforcement flights returning to base after a patrol are also routinely flown at under 800 feet AGL. While opportunities were discussed in our meetings, local law enforcement agencies have not agreed to any voluntary measures and we have not seen any changes in their flight practices to reduce noise. In fact, LAPD went on record defending their “patrol to reduce crime” mission, stating that effective patrols can only be accomplished at 500 to 700 feet AGL and only “transporting and non-patrol flights” have a chance for best practice changes. Any activity in this area to date does not represent significant progress.

- Helicopter operators developed a brochure of local “hot spots” for the pilot community.

LAAHNC: The brochure was unilaterally developed by helicopter pilots, rather than through a collaborative process with community stakeholders, and is mostly a reiteration of long-standing voluntary practices that have proven ineffective in reducing noise. For example, pilots have not committed or even volunteered to adhere to reasonable altitudes over these identified “hot spots” or elsewhere. Identification of a few local “hot spots” is not the answer. Flying at a minimum of 2,000 feet AGL, except where safety, weather, or other conditions prohibit such an altitude, will reduce noise. Pilot unilateral activities in this area do not represent significant progress.

Action 4: Conduct outreach to helicopter pilots to increase awareness of noise-sensitive areas and events.

The FAA and helicopter groups have taken advantage of opportunities over the past year to educate pilots and encourage best practices. We remain alert to the potential to use regularly scheduled meetings, conferences, and special events that attract helicopter pilots as well as various methods of communication, including printed material, Web sites, and targeted emails to increase awareness of noise issues and best practices to reduce noise over noise-sensitive areas.

LAAHNC: The exact wording in the Act required the FAA to “conduct outreach to helicopter pilots to inform them of voluntary policies and to increase awareness of noise sensitive areas and events.” We agree that outreach, if done correctly and thoroughly, can be an effective method of reducing helicopter noise, but if and only if the outreach includes effective flight parameters such as minimum altitudes and limited hovering times. The Pilot Outreach Working Group, comprising pilot and community stakeholders with FAA support, met many times concerning processes to communicate with pilots regarding voluntary measures. But, no processes were ever adopted. While some outreach has been initiated, we have no written agreements on substantial new voluntary policies or best practices to reduce noise. Pilot-led outreach so far promotes measures that do little to reduce noise impact on noise sensitive

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areas. Without specific new voluntary policies, outreach is limited to a repetition of long-standing practices that are highly unlikely to bring about any future noise reductions. From what we have seen, pilot groups have conducted more outreach than the FAA, but it has been sporadic, unorganized, and not memorialized with pilot sign-offs. The efforts to date do not represent even initial progress, let alone significant progress.

Achievements:

- Prepared and disseminated handouts describing noise sensitive areas to over 500 participants of the annual helicopter industry conference and 7 major local helicopter operators.
- Posted information at FAASafety.gov regarding noise sensitive areas for Los Angeles County helicopter pilots and issued email “Notice” blasts for various local events.
- Participated and briefed industry groups and professional associations at the annual safety event hosted by the FAA.
- Conducted several pilot/controller forums at local airports to address helicopter operating best practices and noise sensitive areas.

LAAHNC: Unfortunately, because the Automated Complaint System just became partially operational on April 1, 2015, we have no baseline data that can be used to see if these achievements have had any actual positive impacts. Anecdotal information suggests they have not. For example, controllers at the Torrance Airport continue to routinely direct flights in a manner that conflicts with the City's local airport noise abatement rules.

Action 5: Explore a more comprehensive noise complaint system.

Implementation of a dedicated helicopter noise complaint system for Los Angeles County is well underway. The system will consist of a dedicated web portal, radar flight tracking, and a brokering system that can route complaints associated with a specific airport to that airport's noise office and forward helicopter noise complaints received by airports to the centralized helicopter noise portal. This system has the potential to form the basis of an on-going helicopter noise program, and the data it generates can help to inform decisions about modifications of helicopter routes and operations in the future.

LAAHNC: Registration of complaints is only the first step in effective noise reduction. The helicopter flight that causes the complaint must be identified and a method established to gain pilot compliance with agreed-to voluntary measures. Assuming agreements on voluntary practices could be reached, we suggested that a panel of representatives from the helicopter industry, LAAHNC, and the FAA examine complaints to determine if further action is needed. We also suggested a tiered response to incidents for pilots and operators that routinely ignore agreed-to best practices. However, pilots have stated that they want to self-police and do not want community stakeholders involved in any type of enforcement efforts. Again, this flies in the face of working together collaboratively. The efforts in this area to date do not represent significant progress.

Achievements:

- The FAA and stakeholders investigated and evaluated currently available technology and options for a helicopter noise complaint system.

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- FAA allocated funding to acquire 12 months of correlated noise complaint/flight track data for helicopters.

LAAHNC: We have always felt that any complaint system should be operational for a minimum of three years to establish the necessary baselines and datasets for determining noise hot spots and ensuring that helicopter noise levels continue to be reduced and remain at reduced levels. We hope that the FAA plans to continue operating the system for at least two additional years.

- A contractor was selected to develop and administer a complaint system that will provide this data.
- The contractor met with FAA and stakeholders to obtain feedback on the design of the complaint system.
- The Automated Complaint System went live in March 2015. The system allows individuals to make complaints about helicopter operations anywhere in the county, both via a website and by telephone.

LAAHNC: We agree with the need for the complaint system and appreciate the FAA's initial funding to get the system up and running. Our recommendation to field test the system before launch was not accepted, the system was launched prematurely, and an essential function of the system (online flight tracking using WebTrak) is not yet accurate or reliable. Most helicopter flights still do not show up on the system and this may discourage potential users and impact accuracy in interpreting the data. When flights do show up on the system, they appear without identifying N-Numbers, or the N-Numbers are frequently incorrect. In addition, the online system and telephone hotline only use English, and this disenfranchises non-English-speaking persons who wish to file complaints. In January 2015, we asked the FAA to make the complaint system available in multiple languages used by Los Angeles area residents, especially Spanish, but this did not happen. Furthermore, the lack of agreement on voluntary measures means there are no new flight standards to which pilots can be encouraged to conform. Therefore, there can be no meaningful follow-up on individual complaints or corrective action taken to gain compliance. In fact, right now the system does not incorporate any type of enforcement function. The FAA's development and operation of the system certainly represent initial progress, but the proof of the pudding is still many months away when we have a full year of complaint data and can begin to ensure statistical validity and understand trends. Finally, helicopter operators' refusal to agree to our proposals are based most often on the grounds of jeopardizing their safety and their position is not going to change no matter how many complaints citizens file. They could avoid "hot spots" but that just moves the noise from one neighborhood to another. Since we have been unable to resolve noise problems in current known hot spots, we are unlikely to have any more success with new ones.

Action 6: Continue the collaborative engagement between community representatives and helicopter operators, with interaction with the FAA.

Collaboration with community representatives and helicopter operators has been an essential part of the Los Angeles Helicopter Noise Initiative. These stakeholders have contributed significant effort towards reaching agreement on a set of voluntary measures that could reduce helicopter noise and enhance quality of life. The success of the voluntary measures will depend in large part on this continuing collaboration. The FAA is committed to working with stakeholders as they further mature and oversee additional voluntary measures and encourages formation of an institutional structure to sustain this robust local engagement.

LAAHNC: Our coalition members and other community stakeholders have participated in 55 major or working group meetings with helicopter pilots and the FAA since December 2012. Most of these meetings have not been effectively collaborative and have resulted in very little

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progress. There are no agreed-to or adhered-to voluntary measures, except one minor change to the way a single local route in Long Beach is used (which has been agreed to in principle, but not yet implemented). Pilot and community stakeholders seriously disagree over flight altitudes. Pilot stakeholders have routinely backed off from preliminary agreements on other measures, such as hovering time limits, helicopter pooling, and specific flight track routes. As we noted earlier in our comments, pilots have stated their reluctance to use new FAA-proposed offshore routes. The entire engagement process has been hindered by a lack of collaborative pilot participation. We would describe the process as generally having been more adversarial than collaborative, especially between the helicopter industry and us. At times the FAA has attempted to mediate between the parties to no avail. Since we do not believe true collaboration has taken place, it is hard for us to say that any progress at all has been made on this action.

Achievements:

- Stakeholder working groups were established and used to formulate proposals for actions 1 through 5.
- FAA facilitated establishing a process to work issues and proposals through a stakeholder steering group and drafting a memorandum of understanding to memorialize the organization of the stakeholders and document the roles and objectives for all participants in this process.

LAAHNC: We also proposed a Memorandum of Understanding (see Attachment 4, which is the LAAHNC counterproposal document that proposes the MOU) that would encompass top-tier objectives, agreed-to voluntary measures, stakeholder and FAA responsibilities, enforcement methods, and commitments to future collaboration. However, no discussions of either the FAA's or our MOU have begun because we have not yet agreed on any voluntary measures. This cannot be considered significant progress.

- The stakeholder steering group, with interaction from the FAA, has formulated a proposed set of over 20 voluntary measures for use by helicopter pilots and operators, ranging from voluntary helicopter routes to voluntary helicopter altitudes in specific areas that will reduce helicopter noise in noise-sensitive areas of Los Angeles County while maintaining adequate margins of safety.

LAAHNC: Working with the FAA, pilot and community stakeholders have actually proposed more voluntary measures than the 20 noted by the FAA, but only one local measure has been agree to and no measures have been adopted and implemented into practice. In November 2014, LAAHNC proposed a Memorandum of Understanding and consolidated all stakeholder-proposed measures into 29 voluntary measures (see Attachment 4, which is the LAAHNC counterproposal document demonstrating the depth of our effort). However, to date, there are no agreed-to countywide measures (zero) between the pilot and community stakeholders, and only one agreed-to local route measure for Long Beach (this agreed-to, but not yet implemented measure consolidated three measures from our counterproposal). All other voluntary agreements continue to be negotiated between the pilot and community stakeholders. It would be fair to state that there are very significant differences of opinions between the two groups of stakeholders. Even when there has seemed to be initial agreement among the stakeholders at FAA-sponsored meetings, no final agreements have been reached. This does not represent even initial progress, and cannot be considered significant progress.

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- FAA has participated in over 50 meetings with stakeholders and has been the primary provider of technical support, flight data, and analysis to the stakeholders.

LAAHNC: It was actually 55 meetings since December 2012. However, holding meetings is not the same as collaborating. Although we felt that we were proposing measures that included input from pilot stakeholders through working group meetings, we were disappointed that pilots counter-proposed a set of measures (mostly measures from the industry's long-standing noise abatement program) that we felt were not sufficient to reduce noise. After multiple meetings and extensive discussions, the pilot and community stakeholders have reached no agreement (zero) on any proposed voluntary measure that would lead to substantial noise reduction across the County or in any specific region.

Next Steps

Noise abatement measures developed with input from engaged stakeholders and the FAA remain the most effective approach to reducing helicopter noise. The FAA is committed to continuing its collaboration with stakeholders in pursuit of voluntary agreements on routes and altitudes, best practices, outreach and training, implementation of the noise complaint system, and other means of addressing the helicopter noise situation in Los Angeles County.

Over the next year, FAA will expand its evaluation of helicopter traffic throughout the entire Los Angeles County. FAA will review the correlated noise complaint data and work with stakeholders to consider the implications for helicopter routes and operations. FAA anticipates that a memorandum of understanding among all stakeholders, including the FAA, will be signed, and the initial set of voluntary measures will be finalized and implemented this year.

LAAHNC: The community stakeholder outlook is quite different from that of the FAA. Helicopter noise has been an ongoing problem in the United States for decades. In the late 1970s, the FAA issued proposed regulations to address the problem. In response, the helicopter industry argued that a better approach would be industry-developed voluntary guidelines to control impacts through operational means. In the fall of 1981, the FAA agreed to withdraw its proposed rules with the understanding that the helicopter industry would implement a voluntary noise abatement program. As a result, the Helicopter Association International (HAI) published their Fly Neighborly Guide in 1981. Since that time, helicopter noise has dramatically grown to become a larger problem. It is obvious that this industry-based voluntary approach has not resolved the problem. It is unrealistic to expect the industry to effectively regulate itself.

LAAHNC members have been trying to get the industry to voluntarily mitigate helicopter noise in the Los Angeles area for years, yet the noise impacts have steadily increased. We were optimistic that under the Los Angeles Helicopter Noise Initiative significant progress would be made. However, even with our intensified attempts to collaborate over the past couple of years and with stakeholders working under a Congressional mandate, we could not get close to an agreement on voluntary measures. We have made a good faith effort to explore every option, but now believe that our differences are not resolvable and that we have reached an intractable impasse with the pilot stakeholders. Moreover, even if voluntary agreements could be reached, we have reason to believe widespread pilot compliance would be difficult to achieve.

Our experience is not unlike that of other community groups across the country. For example, voluntary efforts at helicopter noise reduction were tried on the Long Island shoreline of New York and failed to adequately resolve problems. It was not until 2012, when the FAA adopted a regulation establishing a mandatory offshore route, that noise impacts on residents of that region were effectively reduced. The helicopter industry challenged that action asserting that the FAA lacked authority to alter air traffic patterns for the sole purpose of reducing the impact of aircraft noise on residential communities. However, in a precedent setting decision in July 2013, the court upheld the authority of the FAA to do so (Helicopter Association International v.

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Federal Aviation Administration, United States Court of Appeal, District of Columbia Circuit, Case No. 12-1335, decided July 12, 2013.

We question the value of continued collaboration in an attempt to reach voluntary agreements that are clearly not attainable. Unless helicopter pilots are willing to significantly modify their positions and agree to voluntary measures that would truly reduce noise, there is no point in prolonging collaboration. LAAHNC board members believe that since no significant progress has been made, the Secretary should begin the regulatory process as called for in the Act passed in January 2014.

ATTACHMENTS

1. LAAHNC position paper in support of offshore route proposal
2. LAAHNC position paper in support of 2,000-foot AGL altitude goal
3. FAA Advisory Circular 91-36D
4. LAAHNC Counterproposal, November 2014

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ATTACHMENT 1 – LOS ANGELES AREA HELICOPTER NOISE COALITION (LAAHNC) POSITION PAPER IN SUPPORT OF OFFSHORE ROUTE PROPOSAL

BACKGROUND

The LAAHNC has been negotiating with helicopter pilots for an offshore helicopter route along the Los Angeles County coastline. Although there is no official published offshore route now, most stakeholders agree that there is a high concentration of helicopter flights on and near the shoreline. The Los Angeles area coastline is one of its most important natural assets. Helicopter traffic and noise on the shoreline detracts from its beauty and public enjoyment. For residents, helicopter traffic and noise is not only annoying, but also results in loss of privacy and negatively impacts their quality of life. LAAHNC proposes that single-engine helicopters carrying passengers for hire fly **one-half mile** offshore and all other helicopters fly **one mile** offshore. The FAA has indicated that they are considering establishing voluntary routes **one-quarter** and **three-quarter miles** offshore. Pilots have said they will not agree to any voluntary route more than **300 feet** offshore (at an altitude of 750 feet above sea level).

SUPPORT FOR LAAHNC PROPOSAL

All stakeholders agree that helicopter route changes should not simply move noise from one residential area to another. In an area as densely populated as Los Angeles, there are few opportunities to accomplish that goal. However, the change with the most potential is to establish a route that takes advantage of the Pacific Ocean.

At 300 feet offshore and an altitude of 750 feet, the pilots' proposal would put helicopters at a slant distance of about 800 feet from the ground on the shore. At that distance many flights of small helicopters are likely to produce in excess of 70 dB (maximum) of noise on the ground. This level of noise is significantly more than the 60 dB (maximum) which begins to interfere with hearing and understanding outdoor speech. Larger helicopters would produce a higher level of noise. Moreover, there are homes on the edges of cliffs on the coastline that are up to 200 feet above sea level. For them, helicopters would be closer and result in a higher level of noise.

The routes being considered by the FAA would help, but at one-quarter mile offshore helicopters would be about 1,300 feet from noise sensitive areas. LAAHNC's proposal of one-half mile offshore would put them over 2,600 feet offshore. At that distance, they could still be heard from shore, but the noise level would be low enough so that most flights would not interfere with the ability to hear and understand outdoor speech.

SAFETY CONSIDERATIONS

The pilots' stated reason for not flying farther offshore is safety. They are concerned about loss of power, in which case they want to be able to reach land rather than come down in the water where they believe their personal safety would be at risk.

The FAA requires single engine commercial helicopters (engaged in carrying passenger for hire) to be equipped with flotation devices in order to fly over water, unless they stay within power-off distance to land. Helicopter owners don't want to install flotation devices. They don't want to incur the cost. Moreover, they would prefer to fly closer to the scenic coastline, especially if they are tour operators.

We have serious concerns about that FAA regulation. LAAHNC recognizes the need for safe helicopter operation, but is also concerned about the safety of people on the ground. For example, as reported by [USA Today](#), on July 27, 2014, a father and his nine year old daughter were struck and killed on the beach along Florida's Gulf Coast by a fixed-wing plane making an emergency landing (the father died that day and the daughter died two days later).

The LA area coastline consists of homes and beaches that are populated much of the time. We believe that encouraging pilots to attempt emergency landings in densely populated areas as opposed to the open ocean is bad public policy. But, we are proposing the one-half mile offshore route so pilots of commercial flights will still be able to comply with the regulation. However, twin engine helicopters and non-commercial helicopters are not bound by the regulation. They are permitted to fly farther offshore and we believe they should do so.

A Robinson R44 (probably the most commonly used small civil helicopter in the Los Angeles area) has a minimum glide ratio of about 4:1, which means it can glide about one nautical mile (1.15 statute mile) per 1,500 feet in altitude above ground level (AGL) [source: Robinson R44 Pilot's Operating Handbook]. LAAHNC believes helicopters should be able to fly one-half mile offshore and still be within power-off distance to shore, particularly since pilots have the discretion to fly as high as needed to ensure they have a sufficient glide distance to shore.

In addition, many of the flights along the coastline are test flights done by Robinson Helicopter Company, the world's largest manufacturer of civil helicopters, which is located at Torrance Airport. These test flights do not carry passengers and are not subject to the FAA regulation requiring flotation devices to fly over water. Moreover, their FAA-approved flight test area is over the Pacific Ocean and it extends for approximately 20 miles along the shoreline, from just south of LAX to Long Beach, and from the shoreline to **two miles offshore**. Obviously, Robinson can comply with our proposal to fly **one mile offshore**, yet they still choose not to do so.

CONCLUSION

Offshore routes offer the ability to move noise completely away from noise sensitive areas. Helicopters that are already following the coastline can alter their flight paths slightly to take their noise out over the Pacific Ocean where it will not have negative impacts.

LAAHNC has not been given any hard evidence that it would unsafe to encourage pilots to comply with our offshore routes proposal as a general rule, allowing for reasonable exceptions such as poor weather conditions and specific Air Traffic Controller instructions.

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ATTACHMENT 2 – LOS ANGELES AREA HELICOPTER NOISE COALITION (LAAHNC) POSITION PAPER IN SUPPORT OF COUNTYWIDE 2,000-FOOT AGL HELICOPTER ALTITUDE GOAL

BACKGROUND

The LAAHNC and helicopter pilots have been negotiating for a countywide altitude guideline. Currently, there are no specific FAA restrictions on how high or low helicopters fly in this area. The FAA has published recommended (voluntary) helicopter routes. However, they generally do not specify altitudes. Ultimately, helicopter pilots decide how high to fly, except for Air Traffic Controller (ATC) instructions near airports. The LAAHNC proposes that helicopter pilots fly at least 2,000 feet above ground level (AGL), whenever possible. Pilots have offered a guideline of 1,000 feet AGL. LAAHNC has requested that the FAA provide locations where flying at 2,000 feet AGL presents safety problems.

HELICOPTER NOISE IMPACTS

Helicopter noise negatively impacts residents of the Los Angeles area. Negative impacts include noise that interferes with ability to hear/understand speech, television, radio, and telephone, and causes general annoyance. Other impacts include loss of privacy, personal enjoyment of property, and property values. No studies have ever been done on environmental or economic impacts of helicopters in the LA area, including impacts associated with existing voluntary routes. LAAHNC's data shows that a helicopter flying at 1,000 feet AGL produces a noise footprint (averaging from 60 to 69 dB) that is a mile wide, sufficient to interfere with speech on the ground, with potential negative impacts on hundreds of people for every mile along its flight path.

GUIDELINES SUPPORT 2,000 FEET AGL

We have not done an exhaustive search, but we are aware of at least several existing recommendations that helicopters fly at least 2,000 feet AGL above noise sensitive areas, whenever possible, including the following: **FAA Advisory Circular 91-36D** (applicable nationwide), **FAA New York Helicopter Route Chart**, **The New England Helicopter Council**, and **Chicago Helicopter Express** (a helicopter tour operator – reported by Aviation Week, March 1, 2015).

NOISE RESEARCH AND TESTING SUPPORTS HIGHER ALTITUDE

According to the acoustics industry, **noise begins to interfere with outdoor speech at 60 dB**. Noise testing done by LAAHNC (100 random noise meter readings) shows that at a distance of 2,000 feet about half of Robinson's (small) helicopter flights still produced over **62.5 dB** (maximum) on the ground – enough to interfere with speech. Therefore, even at 2,000 feet AGL, small helicopters still produce too much noise on the ground. Moreover, 2,000 feet AGL does not begin to resolve the problems caused by larger helicopters, including emergency responders and news media, multiple helicopters hovering at the same time, or areas experiencing frequent flights.

The FAA has no relevant noise metric or noise standard for helicopter cruise flyovers. The pilots rely on the helicopter industry's recommendation as contained in the Helicopter Association International (HAI) Fly Neighborly Guide, which is self-serving. The Guide states that 65 dB (max) is the "generally accepted criterion". But, it does not indicate by whom it is generally accepted. A committee comprising helicopter industry representatives developed this guideline. The general public was not represented and had no input. Note that 65 dB interferes with speech on the ground, and that is not acceptable to the community.

In addition, the Guide recommends that helicopters fly at or above 1,000 feet AGL to stay under 65 dB. This is not accurate. LAAHNC's noise testing produced different results. LAAHNC tests show that at a distance of 1,000 feet, half of Robinson's helicopters produce noise on the ground **above 69 dB**. LAAHNC tests indicate the helicopters tested would have to fly at least **2,500 feet AGL** in order to keep half of the flights from interfering with speech on the ground.

The HAI Fly Neighborly Guide was published in 1981, is out of date, and has not resolved the problem. Furthermore, in its Noise Abatement Training CD, copyrighted in 2005, HAI published new and different guidance. This states that the "acceptable noise level differs between low and high ambient noise environments" and indicates it should be less than 65 dB in low ambient noise areas in which case small helicopters should fly higher than 1,000 feet AGL. However, this information is conveniently ignored by the pilots.

LACK OF DOCUMENTED EVIDENCE THAT HELICOPTERS CANNOT SAFELY FLY HIGHER

The FAA does not prohibit helicopters from flying at or above 2,000 feet AGL (except when directed by ATC). At times helicopter pilots do fly at and above 2,000 feet AGL. It can be done. No independent analysis has been done to show that it is not safe to fly helicopters at 2,000 feet AGL.

SAFETY ADVANTAGE OF FLYING HIGHER

Helicopter pilots are concerned about possible loss of helicopter power. This is the reason they give for refusing to agree to an offshore helicopter route. Flying low gives a pilot very little time to find a suitable location to land in an emergency. Flying higher gives a pilot more time to reach a suitable emergency landing area. Much of LA is densely populated with few open spaces. The higher a helicopter pilot flies, the better the chances of finding a suitable landing area and executing an emergency landing without injury to the pilot, passengers, or persons on the ground. No consideration has been given to the fact that flying higher would enhance safety in connection with emergency landings. (LAAHNC's study of NTSB records indicated that of the 146 helicopter accidents in the United States in 2013, about one-third involved loss of power or mechanical malfunction as opposed to pilot error.)

CONCLUSION

LAAHNC would like pilots to agree to the goal of flying at least 2,000 feet AGL, whenever and wherever safely possible. We understand and accept that there will be exceptions (for weather, ATC instructions, and other unique circumstances). Our request is not unreasonable. It will still not completely resolve the noise problem in LA. Even at 2,000 feet AGL, helicopters will still interfere with speech on the ground and be annoying at times. However, we are willing to compromise to get an initial agreement while continuing to pursue further improvements.

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ATTACHMENT 3 – FAA ADVISORY CIRCULAR 91-36D



U.S. Department
of Transportation

Federal Aviation
Administration

ADVISORY CIRCULAR

**Subject: VISUAL FLIGHT RULES (VFR) FLIGHT
NEAR NOISE-SENSITIVE AREAS** Date: September 17, 2004 AC No: 91-36D

Initiated by: ATO-R

1. PURPOSE. This Advisory Circular (AC) encourages pilots making VFR flights near noise-sensitive areas to fly at altitudes higher than the minimum permitted by regulation and on flight paths that will reduce aircraft noise in such areas.

2. EFFECTIVE DATE. This advisory circular is effective on September 17, 2004.

3. CANCELLATION. Advisory Circular 91-36C, Visual Flight Rules (VFR) Flight Near Noise Sensitive Areas, dated October 19, 1984, is cancelled.

4. AUTHORITY. The FAA has authority to formulate policy regarding use of the navigable airspace (Title 49 United States Code, Section 40103).

5. EXPLANATION OF CHANGES. This AC has been updated to include a definition of “noise-sensitive” area and add references to Public Law 100-91; the FAA Noise Policy for Management of Airspace Over Federally Managed Lands, dated November 1996; and the National Parks Air Tour Management Act of 2000, with other minor wording changes.

6. BACKGROUND.

a. Excessive aircraft noise can result in annoyance, inconvenience, or interference with the uses and enjoyment of property, and can adversely affect wildlife. It is particularly undesirable in areas where it interferes with normal activities associated with the area's use, including residential, educational, health, and religious structures and sites, and parks, recreational areas (including areas with wilderness characteristics), wildlife refuges, and cultural and historical sites where a quiet setting is a generally recognized feature or attribute. Moreover, the FAA recognizes that there are locations in National Parks and other federally managed areas that have unique noise-sensitive values. The Noise Policy for Management of Airspace Over Federally Managed Areas, issued November 8, 1996, states that it is the policy of the FAA in its management of the navigable airspace over these locations to exercise leadership in achieving an appropriate balance between efficiency, technological practicability, and environmental concerns, while maintaining the highest level of safety.

b. The Federal Aviation Administration (FAA) receives complaints concerning low flying aircraft over noise sensitive areas such as National Parks, National Wildlife Refuges, Waterfowl Production Areas and Wilderness Areas. Congress addressed aircraft flights over Grand Canyon National Park in Public Law 100-91 and commercial air tour operations over other units of the National Park System (and tribal lands within or abutting such units) in the National Parks Air Tour Management Act of 2000.

c. Increased emphasis on improving the quality of the environment requires a continuing effort to provide relief and protection from low flying aircraft noise.

d. Potential noise impacts to noise-sensitive areas from low altitude aircraft flights can also be addressed

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ATTACHMENT 3 – FAA ADVISORY CIRCULAR 91-36D

through application of the voluntary practices set forth in this AC. Adherence to these practices is a practical indication of pilot concern for the environment, which will build support for aviation and alleviate the need for any additional statutory or regulatory actions.

7. DEFINITION. For the purposes of this AC, an area is “noise-sensitive” if noise interferes with normal activities associated with the area’s use. Examples of noise-sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas (including areas with wilderness characteristics), wildlife refuges, and cultural and historical sites where a quiet setting is a generally recognized feature or attribute.

8. VOLUNTARY PRACTICES.

a. Avoidance of noise-sensitive areas, if practical, is preferable to overflight at relatively low altitudes.

b. Pilots operating noise producing aircraft (fixed-wing, rotary-wing and hot air balloons) over noise-sensitive areas should make every effort to fly not less than 2,000 feet above ground level (AGL), weather permitting. For the purpose of this AC, the ground level of noise-sensitive areas is defined to include the highest terrain within 2,000 feet AGL laterally of the route of flight, or the uppermost rim of a canyon or valley. The intent of the 2,000 feet AGL recommendation is to reduce potential interference with wildlife and complaints of noise disturbances caused by low flying aircraft over noise-sensitive areas.

c. Departure from or arrival to an airport, climb after take-off, and descent for landing should be made so as to avoid prolonged flight at low altitudes near noise-sensitive areas.

d. This advisory does not apply where it would conflict with Federal Aviation Regulations, air traffic control clearances or instructions, or where an altitude of less than 2,000 feet AGL is considered necessary by a pilot to operate safely.

9. COOPERATIVE ACTIONS. Aircraft operators, aviation associations, airport managers, and others are asked to assist in voluntary compliance with this AC by publicizing it and distributing information regarding known noise-sensitive areas.

Signed

Sabra W. Kaulia
Director of System Operations & Safety

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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

Los Angeles Area Helicopter Noise Coalition

Citizens seeking relief from helicopter noise – A problem for more than 40 years

LAHelicopterNoise.org November 20, 2014

President
Bob Anderson
*Sherman Oaks
Homeowners Association*

Vice President
Richard Root
*Citizens for Quiet
Helicopters (Torrance)*

Treasurer
Dave Garfinkle
*Tarzana Property Owners
Association*

George Abrahams
*Beachwood Canyon
Neighborhood Association*

John Bailey
*Southeast Torrance
Homeowners Association*

Gerry Hans
Friends of Griffith Park

David Rankell
*Van Nuys Airport
Citizens Advisory Council*

Mike Savidan
Mayor, City of Lomita

Donna Sievers
*Bluff Heights (Long Beach)
Neighborhood Association*

Gerald A. Silver
Homeowners of Encino

Rudy Whitcomb
Rolling Hills Estates

Wayne Williams
*Van Nuys Airport
Citizens Advisory Council*

Mr. Glen Martin
Western-Pacific Region Administrator
Federal Aviation Administration

Mr. Ed Story
Board of Directors
Professional Helicopter Pilots Association

Mr. Jim Wisecup
Board of Directors
Helicopter Association International

Mr. Chuck Street
Executive Director
LA Area Helicopter Operators Association

Subject: LAAHNC Proposed Revisions to MOU and Voluntary Measures

Reference 1: Memorandum of Understanding (MOU), Los Angeles Helicopter Noise Initiative, FAA draft dated October 7, 2014

Reference 2: Los Angeles Area Voluntary Measures for Helicopter Noise Reduction, Pilot Proposal dated October 10, 2014

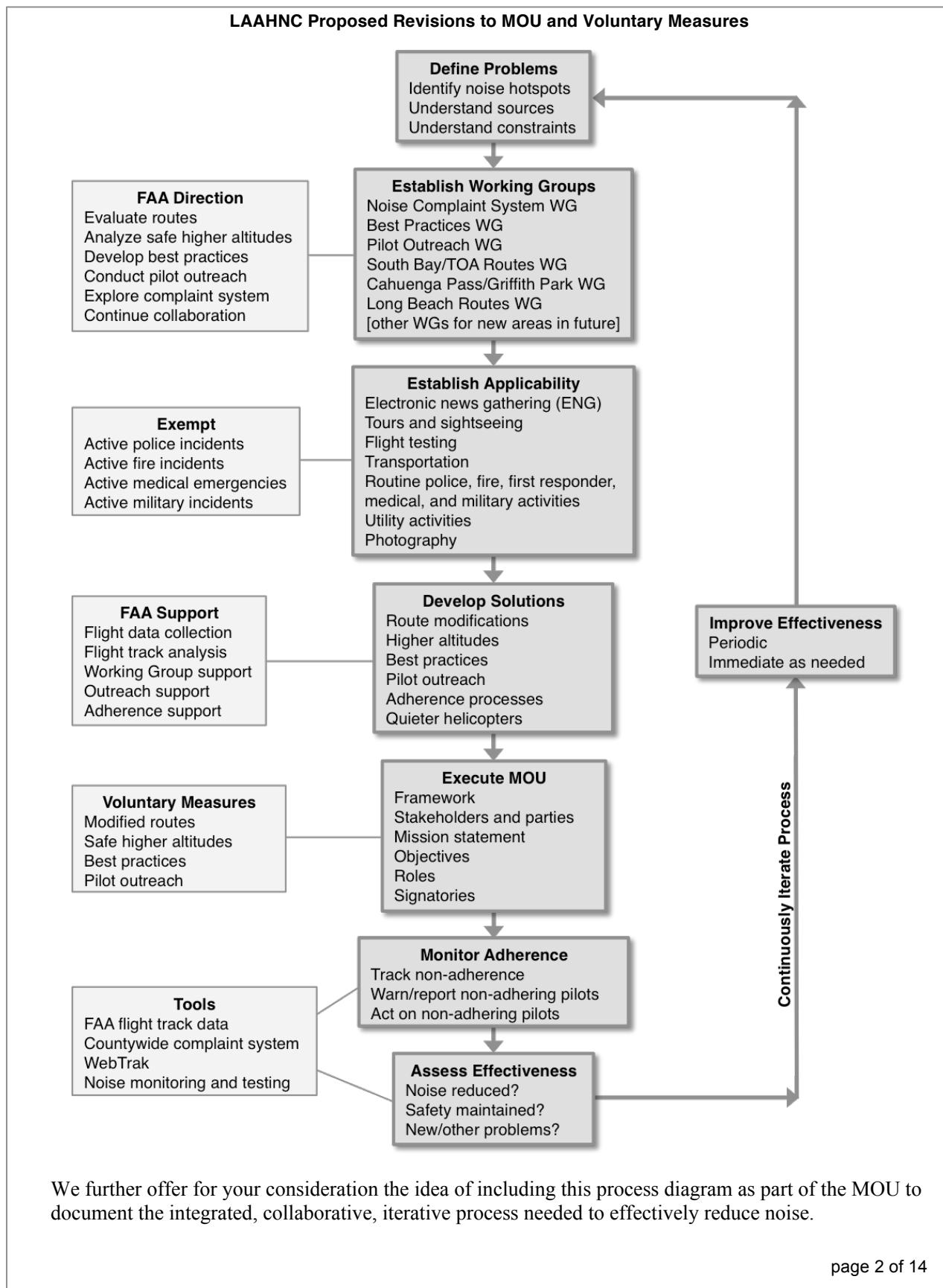
LAAHNC thanks the FAA for their proposed draft Memorandum of Understanding (MOU, Reference 1) and the pilot-operator organizations for their proposed voluntary measures (Reference 2). These documents are positive initial steps toward reducing helicopter noise in Los Angeles County and we have taken them very seriously. We have provided counter-proposals to the documents as Attachments 1 and 2 to this letter. In the remainder of this letter, we explain the thought process on how we structured our proposals.

As we developed our counter-proposals, we carefully examined how the MOU and voluntary measures fit into the overall effort that we have collaboratively begun. To aid our thinking, we developed the process diagram on the following page. It shows the major steps: defining problems, establishing working groups, establishing applicability, developing solutions, executing an MOU, monitoring adherence, assessing effectiveness, and iteratively improving effectiveness. When completed and iterated several times, these process steps can lead to successful and effective helicopter noise reduction in the county. The MOU and voluntary measures form the centerpieces of this iterative, collaborative process.

LAAHNC believes that a package comprising these two individual documents is a viable path forward, if the MOU and voluntary measures work together to ensure that each and every needed aspect and issue are addressed until the noise problem is solved. Our proposed MOU (Attachment 1) is based on the FAA MOU draft (Reference 1), including the framework, stakeholders, mission, objectives, and roles. To ensure completeness, we added one objective on continuity of commitment and several roles that include conducting Safety Risk Management (or similar) activities, establishing acceptable noise guidelines, developing and participating in a pilot communication process, and developing and participating in an adherence process. The Safety Risk Management activities are critical because they will be required to raise altitudes in all three areas that we have investigated so far – Cahuenga Pass-Griffith Park, South Bay-Torrance Airport, and Long Beach – and others. We also included a term and severability section that provides for some continuity in the event the rulemaking process is begun and the FAA can no longer participate in the MOU.

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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014



We further offer for your consideration the idea of including this process diagram as part of the MOU to document the integrated, collaborative, iterative process needed to effectively reduce noise.

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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

LAAHNC Proposed Revisions to MOU and Voluntary Measures

Our proposed voluntary measures (Attachment 2) reflect the pilot-operator proposal (Reference 2), but are reorganized around the six actions in the FAA report to better show how each of these actions is addressed. We added language to the preamble to convey that this is only an initial set of voluntary measures that will be iterated and improved over time.

In our working group collaborations, we had been considering 46 voluntary measures as documented in the list of *Proposed Voluntary Practices to Mitigate Helicopter Noise Impacts Over Los Angeles, Revision 8 (R8)*. The table below lists these 46 measures and correlates them to the measures in the pilot-operator proposal. The pilot-proposed measures addressed 13 of the total 46 measures being considered by the working groups, and three of the pilot-proposed measures had never been discussed in the working groups. In addition, some essential measures were not addressed. We incorporated most of the pilot-proposed measures, but modified them as necessary to enhance their effectiveness. We added some measures that had been developed in the working groups, replaced some pilot-proposed measures with similar versions developed in the working groups, and combined pilot-proposed measures with those developed in the working groups. We only proposed those measures that we consider essential to initial helicopter noise reduction efforts. Light gray highlighting in the table identifies where measures were MODIFIED, ADDED, REPLACED, or COMBINED, and Attachment 2 includes annotations in blue to help clarify all changes. We also expanded the signatory list to include all parties that we consider essential for this initial set of voluntary measures.

No.	Short Description	Pilot Proposal	Notes
SBRWG – South Bay Area and TOA Routes Working Group			
1	Fly Neighborly noise goal of <60 dB per single event flyover	–	Included FAA role for developing limit in MOU
2	Agree on minimum altitudes needed to achieve Fly Neighborly goal	–	Included FAA role for required analysis in MOU
3	Jointly request ATCT assist and not direct traffic contrary to City noise abatement laws	–	Included FAA role for this in MOU
4	Jointly request FAA raise Class D ceiling for TOA	–	
5	Define routes/altitudes for N and NE routes	–	Included FAA role for required analysis in MOU
6	Add Additional TOA routes	–	
7	Robinson to spread flights among all routes	–	ADDED modified, combined version of SBRWG 7 and 8
8	Reduce flights on most heavily used routes	–	
9	No helicopter training in South Pattern	–	ADDED modified version of SBRWG 9
10	Robinson discontinue Safety Training Course Flights from TOA	–	
11	Create new coastal route 1 mile offshore	¶ 2.a.i-iv	REPLACED pilot proposals 2.a.i, ii, iii, iv with modified version of SBRWG 11 to increase offshore distance; included FAA role for required analysis in MOU
11a	Chuck Street offshore route pledge	–	Already incorporated in SBRWG 11
12	No transition across Palos Verdes peninsula; use offshore route	–	Dependent on results for SBRWG 11
CPRWG – Cahuenga Pass-Griffith Park Routes Working Group			
1	LAPD MOU concerning Griffith Park	–	
2	Higher routes for Hollywood Sign and Griffith Park	¶ 2.b.i	MODIFIED pilot proposal 2.b.i
2a	Chuck Street pledge near Hollywood Sign	¶ 2.b.ii	MODIFIED pilot proposal 2.b.ii
3	SMO flight path change for higher altitude limit in Cahuenga Pass	–	ADDED modified version of CPRWG 3; included FAA role for required analysis in MOU
4	Chuck Street pledge in Cahuenga Pass	¶ 2.b.vii	MODIFIED pilot proposal 2.b.vii
5	Chuck Street pledge in Hollywood Hills	¶ 2.b.viii	MODIFIED pilot proposal 2.b.viii
LBRWG – Long Beach Routes Working Group			
1	Alternate Long Beach routes	–	Included FAA role for required analysis in MOU
2	Use alternate outbound route and Redondo Avenue for inbound route	–	ADDED modified version of LBRWG 2
3	No corner cutting on Redondo Avenue Route	–	ADDED modified version of LBRWG 3
4	Raise Long Beach Airport altitudes	–	Included FAA role for required analysis in MOU
5	Process for changes to Long Beach LOA	–	
6	Additional Long Beach noise data	–	

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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

LAAHNC Proposed Revisions to MOU and Voluntary Measures

No.	Short Description	Pilot Proposal	Notes
BPWG – Best Practices Working Group			
1	Identify noisy areas	–	Initial identification complete; noise complaint system data will identify additional noise hot spots
2	Minimum flight altitude	¶ 1	REPLACED pilot proposal 1 with modified version of BPWG 2 to expand applicability at higher altitudes
3	Hovering time limit	¶ 4	REPLACED pilot proposals 4 and 5 with modified combination of BPWG 3 and 4 to include maximum 5-minute hovering time as concurred on by BPWG and to require pooling for all events
4	ENG pooling and advanced cameras	¶ 5	
5	Curtail night flights	–	ADDED modified version of BPWG 5; BPWG had already concurred on restriction times
6	Mode C or S transponders	¶ 3	COMBINED modified version of pilot proposal 3 with modified version of BPWG 6 to require use of 1205/1206 codes and future installation of ADS-B transponders
7	Develop methods to identify non-adhering pilots	¶ 7	REPLACED pilot proposal 7 with modified version of BPWG 7 to broaden actions for non-adherence to voluntary measures
8	Chuck Street pledge for freeway routes	¶ 2.b.iii	Not discussed with BPWG
9	Chuck Street pledge to fly safely and prudently	–	Not discussed with BPWG
11	Jim Wisecup Letter of Agreement	–	Not discussed with BPWG
POWG – Pilot Outreach Working Group			
1	Develop communication process for all pilots	–	Included FAA role for developing process in MOU
2	Reach-out for communications and training	¶ 6, 9	REPLACED pilot proposals 6 and 9 with modified version of POWG 2 to add further detail and commitment
3	Develop standardized training curriculum	–	ADDED modified version of POWG 3
4	CFIs educate on voluntary practices	–	ADDED modified version of POWG 4
5	Voluntary agreements in bi-annual reviews	–	ADDED modified version of POWG 5
7	Written pubs on noise-sensitive areas	–	ADDED modified version of POWG 7
8	LOAs available at airports	–	ADDED modified version of POWG 8
NCSWG – Noise Complaint System Working Group			
1	Fund complaint system	–	FAA is funding demonstration
2	Automated helicopter identification	–	FAA demonstration may include identification capability
3	Market and support complaint system	¶ 8	REPLACED pilot proposal 8 with modified version of NCSWG 3 to increase specificity and commitment

We hope that our counter-proposals provide a progressive next step in the collaborative process. We realize that there are significant differences between our respective proposals resulting from concerns that we all bring to the table. While we agree that we are making progress, we worry whether we will be able to make significant, lasting progress by mid-January. We sincerely want to resolve our differences by voluntary agreements and find effective, long-term solutions to the countywide helicopter noise problems. I have talked with Glen Martin and I have talked with Ed Story, and think the three of us agree that the best way to proceed is a face-to-face meeting with a limited number of persons from each of our groups. Glen offered to make a room available at the FAA headquarters building for this meeting. Allowing some time for everyone to prepare, we suggest meeting early in December.

Thank you for all your efforts and considerations in this process. If you have any questions, please email me at BobHillsideOrdinance@roadrunner.com or call me at 213-364-7470.

Sincerely,

Bob Anderson

President, Los Angeles Helicopter Noise Coalition

**Los Angeles Area Helicopter Noise Coalition Comments – May 14, 2015
on the FAA Significant Progress Report on the Los Angeles Helicopter Noise Initiative**

ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

Attachment 1 – LAAHNC-Proposed Memorandum of Understanding

Preamble

Many community representatives and helicopter operator representatives formed a stakeholder group in response to the *Report on the Los Angeles Helicopter Noise Initiative* published on May 31, 2013, by the Federal Aviation Administration (FAA). The stakeholder group has been meeting on a regular basis. Additionally, several working groups have been formed around the six actions from the report to address specific issues and geographical locations. The FAA has provided technical support, flight data, and analysis support to the working groups. The working groups have drafted and discussed many voluntary practices. The purpose of this MOU is to memorialize the organization of the stakeholders and document the objectives for all participants in this process. An initial set of helicopter pilot-operator voluntary measures to reduce noise from helicopter operations in Los Angeles County has been developed separately from this MOU.

In the May 2013 report, the FAA noted that the most satisfactory and widely accepted noise abatement measures are those that are collectively discussed by engaged stakeholders and the FAA at the local level, and are supported by local consensus. The FAA recommended the engagement of a robust local process to pursue remedies that are determined to reduce helicopter noise, are responsive to community quality-of-life and economic interests, and are consistent with National Airspace System safety and efficiency. The FAA committed to undertake and support six actions:

- Evaluate existing helicopter routes to identify feasible modifications that could lessen impacts on residential areas and noise-sensitive landmarks;
- Analyze whether helicopters could safely fly at higher altitudes in certain areas along helicopter routes and at specific identified areas of concern;
- Develop and promote best practices for helicopter hovering and electronic news gathering;
- Conduct outreach to helicopter pilots to increase awareness of noise-sensitive areas and events;
- Explore a more comprehensive noise complaint system; and
- Continue the collaborative engagement between community representatives and helicopter operators, with interaction with the FAA.

Stakeholders and Parties

The stakeholders and parties to this memorandum of understanding currently comprise:

- the Los Angeles Area Helicopter Noise Coalition (LAAHNC);
- the Professional Helicopters Pilots Association (PHPA);
- the Los Angeles Area Helicopter Operators Association (LAAHOA);
- the Helicopter Association International (HAI);
- the Radio and Television News Association (RTNA); and
- the Federal Aviation Administration (FAA) as a supporting party.

The parties encourage participation by other community organizations and helicopter industry associations.

Mission Statement

The parties are committed to collaboratively identifying specific noise-sensitive locations and helicopter operating practices that contribute to noise concerns, and to identifying voluntary measures that will provide noise relief while maintaining an acceptable level of safety without shifting noise from one community to another.

**Los Angeles Area Helicopter Noise Coalition Comments – May 14, 2015
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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

Attachment 1 – LAAHNC-Proposed Memorandum of Understanding

Objectives

The stakeholders and parties to this memorandum of understanding agree to the following objectives:

- continue to undertake and support the six actions identified in the *Report on the Los Angeles Helicopter Noise Initiative* published in May 2013;
- formulate and implement a comprehensive list of voluntary measures for use by helicopter pilots and operators aimed at providing noise relief to communities within Los Angeles County;
- develop and implement a helicopter noise complaint system aimed at acquiring noise complaint data correlated to specific helicopter operations;
- define methods for assessing the effectiveness of the voluntary measures, including positive, neutral, and negative results of the measures and feedback from the helicopter noise complaint monitoring system, from community representatives, from helicopter operators, and from any other applicable sources;
- define processes for making periodic adjustments to improve the effectiveness of voluntary measures and to correct deficient voluntary measures; and
- ensure continued commitment of all stakeholders and parties to this MOU for their support of all efforts necessary to reduce helicopter noise in Los Angeles County.

Roles

A. The FAA will:

- A1. provide support, information, and data (including flight track and other data) as needed to analyze helicopter operations, flight patterns, and routes;
- A2. provide technical assistance regarding flight safety, including consideration of next-generation air traffic control systems to monitor and control helicopter traffic in specific noise-sensitive, high-traffic areas;
- A3. facilitate outreach of voluntary measures through effective dissemination of information to all helicopter pilots operating in Los Angeles County;
- A4. facilitate operation of a countywide helicopter noise complaint and helicopter identification system in Los Angeles County, and facilitate and support analysis of noise hot spots and complaints involving helicopters that do not adhere to the voluntary measures;
- A5. facilitate noise monitoring and testing to assess the effectiveness of voluntary measures in reducing noise levels;
- A6. conduct any and all data collection, analysis, and other activities, such as Safety Risk Management activities, that are necessary to allow helicopters to fly at higher altitudes along specific routes to determine the highest altitudes that can be recommended as voluntary measures while maintaining an acceptable level of risk to the National Airspace System and also considering risks to safety of persons on the ground;
- A7. establish noise guidelines, in terms of A-weighted single event noise level metrics, for acceptable levels of helicopter generated noise in residential areas;
- A8. participate in development of a communication process that ensures all helicopter pilots and operators flying in Los Angeles County are provided timely information regarding noise-sensitive areas and voluntary measures designed to reduce the impact of helicopter noise, and participate in the developed process to ensure rapid and effective communication;

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- A9. participate in development of a process to ensure helicopter pilot and operator adherence to voluntary measures, and participate in the developed process, including identification, warning, and training of persistent non-adhering pilots; and
- A10. refrain from directing air traffic contrary to local airport noise abatement laws, except in emergencies;
- B. PHPA, LAAHOA, HAI, and RTNA will:
 - B1. participate in collaborative formulation and implementation of comprehensive voluntary measures for use by helicopter pilots and operators that will reduce helicopter noise in all noise-sensitive areas of Los Angeles County while maintaining adequate margins of safety;
 - B2. facilitate outreach of voluntary measures through effective dissemination of information to all helicopter pilots operating in Los Angeles County;
 - B3. provide input from helicopter operator stakeholders;
 - B4. suggest practices within the confines of the Los Angeles County area airspace complexity to reduce noise;
 - B5. support analysis of complaints involving helicopters that do not adhere to the voluntary measures by investigating complaints, identifying and contacting pilots and operators, and encouraging pilots and operators to comply;
 - B6. participate in development of a communication process that ensures all helicopter pilots and operators flying in Los Angeles County are provided timely information regarding noise-sensitive areas and voluntary measures designed to reduce the impact of helicopter noise, and participate in the developed process to ensure rapid and effective communication;
 - B7. maintain and disseminate to all stakeholders and parties to this MOU a current list of helicopter operators in Los Angeles County including the N-numbers of the helicopters that they operate;
 - B8. disseminate voluntary measures to all helicopter pilots and operators in Los Angeles County through training and other effective means, encourage them to agree in writing to abide by them, and maintain a written list of operators who have done so; and
 - B9. participate in development of a process to ensure helicopter pilot and operator adherence to voluntary measures, and participate in the developed process, including identifying, contacting, warning, and training persistent non-adhering pilots, maintaining a list of non-adhering pilots with dates, method of non-adherence, and actions taken, and making this list available to all other stakeholders and parties to this MOU.
- C. LAAHNC will:
 - C1. participate in the collaborative formulation of comprehensive voluntary measures for use by helicopter pilots and operators that will reduce helicopter noise in all noise-sensitive areas of Los Angeles County while maintaining adequate margins of safety;
 - C2. provide input from community stakeholders;
 - C3. identify noise issues and noise hot spots;
 - C4. suggest practices within the confines of the Los Angeles County area airspace complexity to reduce noise;
 - C5. support analysis of complaints involving helicopters that do not adhere to the voluntary measures;

**Los Angeles Area Helicopter Noise Coalition Comments – May 14, 2015
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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

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- C6. maintain a map of helicopter noise hot spots across Los Angeles County and make this map available to all other stakeholders and parties to this MOU;
- C7. participate in development of a communication process that ensures all helicopter pilots and operators flying in Los Angeles County are provided timely information regarding noise-sensitive areas and voluntary measures designed to reduce the impact of helicopter noise, and participate in the developed process to ensure rapid and effective communication;
- C8. participate in development of a process to ensure helicopter pilot and operator adherence to voluntary measures, and participate in the developed process, including identification of non-adhering pilots; and
- C9. help inform the public of the efforts being made, agreements reached, voluntary measures, how to use complaint system, and progress made in reducing noise.

Term/Severability

This MOU will remain in effect until cancelled or amended by all parties. Any party can choose to opt-out at their discretion at any time by written notice to the remaining parties and the MOU will remain in effect. If the FAA begins any regulatory, rulemaking, or similar process to address helicopter noise in Los Angeles County, the FAA may have to discontinue its support of this MOU, severing parts of it; however, the remainder of the MOU will remain in effect unless cancelled by the remaining parties.

Signatories

Los Angeles Area Helicopter Noise Coalition (LAAHNC)

Los Angeles Area Helicopter Operators Association (LAAHOA)

Professional Helicopter Pilots Association (PHPA)

Helicopter Association International (HAI)

Radio and Television News Association (RTNA)

Federal Aviation Administration (FAA) as a supporting party

**Los Angeles Area Helicopter Noise Coalition Comments – May 14, 2015
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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

Attachment 2 – LAAHNC-Proposed Voluntary Measures

[Includes annotations, in blue, to help clarify changes. These would be removed in the final version.]

Preamble

In response to the concerns and input received from residents across Los Angeles County, numerous public and private Los Angeles area helicopter operators and organizations of helicopter operators and pilots have collaborated with community groups to create the following voluntary measures that will provide helicopter noise reduction without compromising safety or shifting noise from one community to another.

These voluntary measures shall not restrict active operations conducted for services to the public, to include, but not limited to, law enforcement flights in support of active incidents, search and rescue operations, firefighting, emergency medical helicopters engaged in an active mission (government or commercially operated), or missions in support of the public infrastructure. It is understood that certain of these mission-critical helicopter operations may have an adverse noise impact on communities. However, except in support of active operations, every effort will be made to adhere to these voluntary measures.

All signatory parties acknowledge that many of these voluntary measures represent only an initial step in reducing noise across Los Angeles County. They also acknowledge that helicopter noise can be reflected, amplified, and carried further distances in hillside terrain, and can have more negative impacts in areas with relatively low ambient noise levels; hillside communities and passive recreation areas, such as Griffith Park wilderness areas, can be very negatively impacted. In addition, the temperature inversion layer that often exists in the Los Angeles basin can increase the distance that helicopter noise travels and reduce the attenuation of this noise by the atmosphere.

The signatories further understand that they will be part of a continuing process to assess and improve the effectiveness of these initial voluntary measures to achieve permanent voluntary measures that ensure meeting a long-term goal of significant noise reduction in all impacted areas of the county. The signatories have therefore adopted certain specific measures that they understand will be updated as further data and analysis become available; these are measures 1, 5, 6, 7, 8, 9, 13, 14, 15, and 17 in this document, which have limited initial noise-reduction impact because safety issues limit flight altitudes at the present time.

To achieve a mutual long-term noise-reduction goal, the signatories, representing a significant number of helicopter pilots and operators in Los Angeles County, urge the FAA to expeditiously conduct any and all data collection, analysis, and other activities, such as Safety Risk Management activities, that are necessary to allow helicopters to safely fly at higher altitudes or farther offshore, thereby reducing noise in at least, but not limited to, the following areas: Cahuenga Pass, Griffith Park, South Bay, Torrance Airport, Long Beach, Sepulveda Pass, southern San Fernando Valley, Santa Monica Mountains, and the entire Los Angeles County coastline. The Santa Monica Mountain area with its eastern terminus near the Los Angeles River warrants special consideration. Pilots and operators support increased altitude ceilings and route improvements in all of these areas to allow helicopters to safely fly higher and farther away from noise-sensitive areas thereby reducing noise impacts.

Voluntary Measures

The following voluntary measures will be followed to the pilot's best ability unless unable due to weather, safety of flight, or Air Traffic Control instructions. For the purposes of this document, these are organized by the actions listed in the FAA's May 31, 2013 *Report on the Los Angeles Helicopter Noise Initiative*.

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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

Attachment 2 – LAAHNC-Proposed Voluntary Measures

Routes and Altitudes Measures

These measures address the following two actions from the FAA report:

- Evaluate existing helicopter routes to identify feasible modifications that could lessen impacts on residential areas and noise-sensitive landmarks; and
- Analyze whether helicopters could safely fly at higher altitudes in certain areas along helicopter routes and at specific identified areas of concern.

South Bay and Torrance Airport Area Measures

1. When flying along the shoreline of Los Angeles County, single-engine helicopters engaged in commercial air tours without flotation devices (under CFR Part 136.11) will fly at least one-half mile offshore at an altitude that allows power-off distance to the shoreline (except when transitioning LAX airspace, where they should follow the existing Shoreline Route within one-quarter mile of the shoreline at or below 150 feet AGL). All other helicopters that are not limited by CFR Part 136.11, including helicopters engaged in non-commercial flights, multi-engine helicopters, and helicopters with flotation devices, will fly at least one mile offshore.
[REPLACED pilot proposals 2.a.i, ii, iii, iv with modified version of SBRWG 11 to increase offshore distance and flight altitude]
2. Robinson Helicopter Company will avoid conducting test flights over residential areas, schools, and other noise-sensitive areas around Torrance Airport.
[ADDED modified, combined version of SBRWG 7 and 8]
3. Pilots and operators will conduct all helicopter training at TOA on the north side of the airport over commercial and industrial areas within the boundaries of Hawthorne, Lomita, and Crenshaw Boulevards. In addition, pilots and operators will conduct training from the pad located on the north side of the airport within the displaced thresholds for Runway 29R/11L (as provided in the current Letter of Agreement between the FAA and TOA based operators). Pilots will refuse ATC tower offers to conduct training on the south side of the airport; instead, pilots will wait until space is available to train on the north side. In addition, emergency responders (e.g., Coast Guard, law enforcement, fire, military, and EMT helicopters) will not conduct any helicopter training at TOA.
[ADDED modified version of SBRWG 9]
4. Robinson Helicopter Company will relocate its Safety Training Course flights away from Torrance Airport to other airports not surrounded by densely populated residential areas.
[ADDED modified version of SBRWG 10]

Cahuenga Pass and Griffith Park Area Measures

5. Pilots and operators acknowledge that 2,000 feet AGL is the goal in all areas, although there may be restrictions to that altitude due to possible interference with fixed wing aircraft, particularly those associated with the Santa Monica Airport (SMO), and analyses are necessary to quantify those restrictions. Pilots and operators will thus initially fly at a minimum altitude of 1,500 feet AGL in the entire Cahuenga Pass and Griffith Park area, knowing that some higher areas, ridgelines, and peaks become no-fly zones with this restricted altitude, due to the SMO flight path or other fixed-wing traffic which limit safe operation at higher altitudes.
[ADDED modified version of CPRWG 3; LAAHNC desires 2,000 feet AGL where possible, but are willing, in only a few specific areas and only as initial interim measures, to initially agree to somewhat lower altitudes until the FAA can do analyses that allow recommending higher minimum altitudes]
6. When flying in the vicinity of the Griffith Observatory, pilots will maintain a minimum altitude of 1,500 feet AGL near the Observatory to reduce vibration to the laserium.
[MODIFIED pilot proposal 2.b.i]

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7. When flying in the vicinity of the “Hollywood Sign”, pilots will fly at least one mile south at a minimum altitude of 1,500 feet AGL. If it is necessary to fly closer than one mile to the “Hollywood Sign”, pilots will climb to a minimum altitude of 1,500 feet AGL. Pilots will make a sincere effort to reduce the noise impact on the residents who live in the vicinity of the “Hollywood Sign”.
[MODIFIED pilot proposal 2.b.ii]
8. When flying along the 101 Freeway through the Cahuenga Pass, pilots will fly at a minimum altitude of 1,500 feet AGL unless restricted by weather or control tower direction.
[MODIFIED pilot proposal 2.b.vii]
9. Pilots will avoid flying over the top of the Hollywood Hills (crossing Mulholland Drive) between the 405 freeway (Sepulveda Pass) and the 101 freeway (Cahuenga Pass) at lower than 1,500 feet AGL. Pilots will adhere to this practice so that their noise impact will be significantly diminished for the residents below.
[MODIFIED pilot proposal 2.b.viii]

Long Beach Area Measures

10. Helicopter pilots and operators will vary their Long Beach departure and arrival routes by using Redondo Avenue for inbound traffic and an alternative route, either Cherry Avenue, Wardlow Road, or Lakewood Boulevard, for outbound traffic, which will allow pilots to fly directly over Redondo Avenue on a “one way only” route thus avoiding flights over noise sensitive neighborhoods and schools to the east and west of Redondo Avenue.
[ADDED modified version of LBRWG 2]
11. Helicopter pilots and operators will work with all helicopter pilots utilizing the Redondo Avenue corridor to ensure that they follow the route to the coast and only commence to turn east or west when at least one-half mile past the shoreline thus ensuring that pilots do not “cut the corner” over residential neighborhoods and schools.
[ADDED modified version of LBRWG 3]
12. In order to increase safety and mitigate the impact of helicopter noise on learning, all helicopter pilots utilizing the Redondo Corridor will avoid flying directly over Horace Mann Elementary School, Fremont Elementary School, Rogers Middle School, and Lowell Elementary School unless public safety issues requires flying over the schools.
[ADDED new measure from LBRWG]

Other Area Measures

13. When flying between the shoreline in Pacific Palisades and the 101 Freeway, pilots will follow a flight path south of Sunset Boulevard at a minimum altitude of 1,500 feet AGL out of consideration for the residents who live in this noise-sensitive area.
[MODIFIED pilot proposal 2.b.iv]
14. When flying east or west through the San Fernando Valley, pilots will follow a flight path along the 101 Freeway at a minimum altitude of 1,500 feet AGL.
[MODIFIED pilot proposal 2.b.v]
15. When flying along the 405 Freeway through the Sepulveda Pass, pilots will fly at a minimum altitude of 1,500 feet AGL when weather permits.
[MODIFIED pilot proposal 2.b.vi]

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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

Attachment 2 – LAAHNC-Proposed Voluntary Measures

Best Practice Measures

These measures address the following action from the FAA report:

- Develop and promote best practices for helicopter hovering and electronic news gathering.
16. As noted in FAA Advisory Circular AC91.36D, helicopters will fly at a minimum altitude of 2,000 feet AGL when flying over noise-sensitive areas such as residences and schools, places of worship, and entertainment venues during hours that these noise-sensitive areas are in session. Police, fire, military, first responder, and medical flights engaged in an active incident are exempt, but would be expected to conform to the minimum altitude requirement during returns to base after an active incident. Routine police patrols will fly at a minimum altitude of 1,000 feet AGL. Timely acquisition of modern optics and other technology is encouraged to allow routine patrols to operate at a minimum altitude closer to 2,000 feet AGL.
[REPLACED pilot proposal 1 with modified version of BPWG 2 to expand applicability at higher altitudes]
17. Pilots should make every effort to fly along freeway routes at a minimum altitude of 1,500 feet AGL. Pilots should do this knowing that the inherent noise generated by their aircraft will blend into the sounds being generated by automobile and truck traffic on the freeway routes below.
[MODIFIED pilot proposal 2.b.iii]
18. Helicopter operators and pilots will use the 1205 and 1206 transponder squawk codes pursuant to the FAA Letter to Airmen dated September 1, 2014. Helicopter operators and pilots that fly in Los Angeles County will equip their helicopters with ADS-B Out transponders by the end of 2015, so that their specific aircraft can be identified on flight tracking systems.
[COMBINED modified version of pilot proposal 3 with modified version of BPWG 6 to require use of 1205/1206 codes and future installation of ADS-B transponders]
19. Electronic News Gathering (ENG) helicopters will fly at a minimum altitude of 2,000 feet AGL when covering an event, pooling cameras so only one helicopter is necessary and limiting hovering time to five minutes or less. When multiple approaches to an event are necessary, pilots will fly in excess of one mile from the event before returning and again hovering. First responder coverage of active incidents should limit hovering time as much as feasible.
[REPLACED pilot proposals 4 and 5 with modified combination of BPWG 3 and 4 to include maximum 5-minute hovering time as concurred on by BPWG and to require pooling for all events]
20. Helicopter pilots and operators will limit night flights between the hours of 11:30 pm to 5:30 am, except for police, fire, first responder, and medical emergency activities and except where local noise ordinances provide more restrictive timeframes.
[ADDED modified version of BPWG 5]
21. Pilots and operators will participate with community stakeholders and the FAA to investigate non-adherence with the voluntary measures and help initiate a staged remediation action starting with reporting the incident to the pilot and appropriate owner and/or operator. Upon a second non-adherence by the same pilot or operator within a 12-month period, a second notice and warning will be sent to the pilot, operator, and owner setting forth further possible corrective actions.
[REPLACED pilot proposal 7 with modified version of BPWG 7 to broaden actions for non-adherence to voluntary measures]

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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

Attachment 2 – LAAHNC-Proposed Voluntary Measures

Pilot Outreach Measures

These measures address the following action from the FAA report:

- Conduct outreach to helicopter pilots to increase awareness of noise-sensitive areas and events.
22. All professional helicopter industry organizations including PHPA, LAAHOA, and HAI, plus electronic news gathering operators, emergency management services operators, utility operators, and other related operators and organizations (including airport associations, if possible) will reach out to all helicopter pilots and operators to facilitate communication and to provide both initial and recurrent training with their members and with all additional helicopter pilots within Los Angeles County thereby ensuring that all aircrews are provided up to date information regarding voluntary measures. These organizations and operators are encouraged to provide ongoing support and promotion of the voluntary measures by notifying their members and updating their publications.
[REPLACED pilot proposals 6 and 9 with modified version of POWG 2 to add further detail and commitment]
23. Helicopter pilots and operators will work with helicopter industry stakeholders to develop a standardized training curriculum that includes specific operating procedures for reducing the impact of helicopter noise to ensure that helicopter pilots and operators comply with voluntary measures that have been created to reduce the impact of helicopter noise.
[ADDED modified version of POWG 3]
24. Helicopter pilots and operators will work to ensure that all Certified Flight Instructors (CFIs) educate their students about voluntary measures and procedures for reducing the impact of helicopter noise on the neighborhoods below their flight paths. At a minimum, this instruction should include the specifics of all pertinent Letters of Agreement between ATC and helicopter operators and all voluntary measures. Prior to every flight, CFIs will set the standard for adhering to voluntary measures.
[ADDED modified version of POWG 4]
25. Helicopter pilots and operators will ensure that all Certified Flight Instructors (CFIs) include curriculum during bi-annual flight reviews of active helicopter pilots that incorporates the voluntary measures for reducing the impact of helicopter noise on residential neighborhoods.
[ADDED modified version of POWG 5]
26. Helicopter pilots and operators will utilize the SoCal Helicopter Noise Area brochure and all other written helicopter pilot publications which identify noise-sensitive areas in Los Angeles County, and will ensure that all written documents are updated when necessary to include information regarding newly identified noise-sensitive areas and new and updated voluntary measures.
[ADDED modified version of POWG 7]
27. Helicopter pilots and operators will request that Air Traffic Control (ATC) take all necessary steps to ensure that all Letters of Agreement (LOAs) be available on all airport websites which will provide access to current information for pilots flying within the County.
[ADDED modified version of POWG 8]

Los Angeles Area Helicopter Noise Coalition Comments – May 14, 2015
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ATTACHMENT 4 – LAAHNC COUNTERPROPOSAL, NOVEMBER 2014

Attachment 2 – LAAHNC-Proposed Voluntary Measures

Noise Complaint System Measures

These measures address the following action from the FAA report:

- Explore a more comprehensive noise complaint system.
28. Helicopter pilots and operators will work with the FAA and community stakeholders to support and ensure continuing operation of a helicopter noise complaint and helicopter identification system where complaints may be submitted either by telephone or online, including marketing and outreach activities to ensure that residents and pilots are aware that the system is in place and understand how the system is used. Helicopter pilots and operators will support analysis of complaint data provided by the system.

[REPLACED pilot proposal 8 with modified version of NCSWG 3 to increase specificity and commitment]

Continued Collaborative Engagement Measures

These measures address the following action from the FAA report:

- Continue the collaborative engagement between community representatives and helicopter operators, with interaction with the FAA.
29. All pilots and operators involved in seeking solutions to helicopter noise issues in Los Angeles County understand that this is a continuing iterative process and commit to continue a collaborative process with community stakeholders and the FAA subsequent to the acceptance of these voluntary measures, understanding that these measures are only the initial step in a longer continuing process. Pilots and operators will encourage others from their industry to participate in the collaborative process.

[MODIFIED pilot proposal 10]

Signatories

Los Angeles Area Helicopter Operators Association (LAAHOA)

Professional Helicopter Pilots Association (PHPA)

Helicopter Association International (HAI)

Radio and Television News Association (RTNA)

Airborne Law Enforcement Association (ALEA)

Robinson Helicopter Company