

# Los Angeles Area Helicopter Noise Coalition

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

President  
**Bob Anderson**  
Sherman Oaks  
Homeowners Association

June 14, 2013

Vice President  
**Richard Root**  
Riviera (Torrance)  
Homeowners Association

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

**Jeffrey Prang**  
Mayor, West Hollywood

**David Rankell**  
Van Nuys Airport  
Citizens Advisory Council

**Mike Savidan**  
City of Lomita Councilman

**Gerald A. Silver**  
Homeowners of Encino

**Rudy Whitcomb**  
Rolling Hills Estates

**Wayne Williams**  
Van Nuys Airport  
Citizens Advisory Council

Mr. David C. Suomi  
Acting Regional Administrator  
Federal Aviation Administration  
Western-Pacific Region  
Post Office Box 92007  
Los Angeles, CA 90009-2007

Dear Administrator Suomi,

**Subject: LAAHNC Follow-Up Questions to FAA at June 10, 2013 Hearing**

Reference: LAAHNC letter to Mr. David Suomi, FAA Acting Regional Administrator,  
*LAAHNC Questions to FAA at June 10<sup>th</sup>, 2013 Hearing*, dated June 10<sup>th</sup>, 2013

At Congressman Schiff's June 10<sup>th</sup> Field Hearing on helicopter noise, LAAHNC members comprised the Neighborhood Stakeholder Panel and asked questions of the FAA on their May 31<sup>st</sup> 2013 *Report on the Los Angeles Helicopter Noise Initiative*. We formally transmitted our original set of fourteen questions in the referenced letter. However, at the hearing, LAAHNC additionally asked follow-up questions based on information that the FAA presented at the hearing. This letter formally transmits three additional follow-up questions, and requests that they also become part of the hearing record. We numbered these follow-up questions consecutively from our original hearing questions for convenience.

15. [This follow-up to LAAHNC Question #2 was asked at the hearing.] In our Question #2, LAAHNC asked why no environmental reviews were ever performed on helicopter routes. The FAA's response indicated that no reviews were performed because no changes to routes had been made. In response to an LAAHNC follow-up question, the FAA further indicated that the routes were already in use by helicopter pilots at the time the FAA published them in the late 1970s. Would it be accurate to say that helicopter pilots who started using the routes originally determined those routes, and that the FAA simply published them with no changes? Also, when the FAA published the routes in the late 1970s, was any consideration given to the possibility that doing so could cause greater awareness and usage among pilots that could cause increased noise impacts? Further, did the FAA give any thought to projecting the growth of helicopter route usage over five to ten years from the time that the routes were initially published, and then estimating potential future impacts of this increased route usage? And finally, with respect to routes established by local letter of agreement, would the answers to these three prior questions be the same? If not, can the FAA specifically explain how the answers would differ?

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16. [This follow-up to LAAHNC Question #3 was asked at the hearing.] At the June 10<sup>th</sup> hearing, the FAA's response to LAAHNC's Question #3 indicated that the FAA believed that the Next Generation Air Transportation System ("NextGen") had little potential for enhancing helicopter safety and safely allowing helicopters to fly at higher altitudes and reduce noise on the ground. Based on the *NextGen Implementation Plan, March 2012*, it appears that little or no activity on NextGen is focused toward helicopter noise. FAA participants at the hearing also stated that Los Angeles has the most complex airspace in the United States. Since the FAA's NextGen contract is an Indefinite Delivery, Indefinite Quantity (IDIQ) task order vehicle with multiple high-technology contractor teams available to quickly perform individual, tailored task orders, would the FAA consider adding a task for evaluating how NextGen could help address the seemingly unsolvable challenge of allowing helicopters to fly safer, higher, and quieter in LA's complex airspace? If not, perhaps Congress needs to request that the FAA conduct such a task, in order to put the necessary levels of technical expertise on this complex problem.
17. [This follow-up to LAAHNC Question #7 was asked at the hearing.] In our Question #7, LAAHNC asked the FAA to explain why they have never developed a standard for an acceptable level of helicopter noise for flyovers of residential and other areas. Their response was that the FAA already has a single noise standard of 65 DNL (Day-Night Level) that they apply to land use compatibility everywhere and in all situations. The standard is established through FAA Order 5050.4B dated April 28, 2006, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, Chapter 1, Paragraph 9n. LAAHNC understands this. Our concern is that this single noise standard is typically used for land use compatibility near airports and is not relevant to the noise exposure during a single-event helicopter flyover or hovering. An airport has aircraft operations over much of the day, and the DNL is a measure of community noise exposure to help predict the effects on a population of the average long-term exposure to environmental noise. Employing a land-use metric to describe cumulative noise over a long period does not make sense for single-event flyovers in residential areas far away from airports. LAAHNC feels that more relevant measures for such events would be the Single Event Noise Exposure Level (SENEL, which takes into account both the maximum noise level and the duration of the noise event), the Maximum Sound Level (L<sub>max</sub>, which measures the peak of the event), or the Time Above Threshold Level (TA, which measures the amount of time the sound level exceeds a threshold of interest, such as outdoor speech interference). Would the FAA please provide their rationale for why they think their 65 DNL airport noise standard should also apply to non-airport helicopter flyovers and why a separate noise standard should not be developed? Would the FAA further comment on the applicability or inapplicability of SENEL, L<sub>max</sub>, and TA to single-event helicopter flyovers?

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Thank you for your consideration. Please inform us when we might expect responses to our original fourteen questions and these three follow-up questions. If you have any questions, please contact me at 213-364-7470 or by email at [BobHillsideOrdinance@roadrunner.com](mailto:BobHillsideOrdinance@roadrunner.com).

Sincerely,



Bob Anderson  
President, Los Angeles Area Helicopter Noise Coalition

cc: Congressman Adam Schiff  
Congressman Tony Cardenas  
Supervisor Zev Yaroslavsky  
Other concerned elected officials and other interested parties  
Steve May, FAA