

Los Angeles Area Helicopter Noise Coalition

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

LAHelicopterNoise.org

June 17, 2016

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Bob Anderson

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Homeowners Association*

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Wayne Williams

*Van Nuys Airport
Citizens Advisory Council*

Mr. Glen Martin

Western-Pacific Regional Administrator
Federal Aviation Administration

Subject: LAAHNC Appeal of Helicopter Noise Regulation Petitions

Dear Glen,

On May 20, 2016, we received four FAA letters dismissing each of our petitions for helicopter flight regulations in Los Angeles County. We wanted to let you know that we are appealing at least three of these petition dismissals because we now have significant additional facts not presented in our original petitions and also found important factual errors in the dismissal letters. We have already submitted our minimum altitude petition appeal (FAA-2015-5041) and offshore route petition appeal (FAA-2015-5044) to Regulations.gov, and will be submitting our hovering-orbiting petition appeal (FAA-2015-5042) soon.

Before we summarize additional details on our appeals, please understand that we do want to continue collaborating with the FAA and helicopter pilots to reduce helicopter noise in Los Angeles County. As we heard from you at our meeting on April 29, 2016, there are no restrictions on continuing our collaborations until the FAA actually accepts our petitions and begins the regulatory process. So, we hope that we can continue to work together.

The FAA's dismissal letters state "The FAA is committed to continuing its evaluation of helicopter traffic in Los Angeles County and will continue community involvement to promote voluntary measures for noise reduction." From our collaborations over the last three years, we are concerned that the collaborative process did not work as well as it could and that voluntary measures may not be able to significantly reduce noise. To kick-start a new round of collaborations, we were hoping that the FAA might consider conducting a meeting between the FAA, pilots, representatives of elected officials, and ourselves to better define the collaborative process and better understand how voluntary measures can work to reduce noise. Topics could include our respective roles in the process, how measures would be implemented, how violators would be identified and held accountable, and how follow-up would ensure continuing adherence. We might gain fresh insights into how we can best continue this effort.

In this letter, we also thought it would be good to provide a short summary of some key points in our appeals, so you understand where we are coming from.

- At the time LAAHNC submitted our offshore route petition (FAA-2015-5044), we were unaware of errors in the FAA's flight track analysis for the Palos Verdes area and have since sent the FAA factual demonstration that their analysis may significantly underrepresent the concentration of helicopter flights in the area, further supporting the need for our proposed offshore route.
- At the time LAAHNC submitted our four petitions, we were unaware of any hard data showing no progress in reducing helicopter noise; the Long Beach Airport collected and analyzed noise data in 2013 and 2015, and comparatively analyzed this data in 2016, concluding that no progress had been made in mitigating noise levels over the residences and local school.

- The FAA dismissal letter for our minimum altitude petition (FAA-2015-5041) stated that requiring helicopters to fly at higher altitudes would negatively impact the safety of the National Airspace System by placing helicopters in conflict with other aircraft and increase the chance of a mid-air collisions; yet, FAA data shows that small fixed-wing aircraft regularly mix with helicopter traffic in the Hollywood Sign/Griffith Park airspace at altitudes less than 2,000 feet above mean sea level.
- The FAA dismissal letter for our minimum altitude petition (FAA-2015-5041) stated that helicopter operators have voluntarily adjusted the altitudes of aircraft flying over the Hollywood Sign and Griffith Park area as much as feasibly possible without compromising the safety of operations; this is incorrect, as demonstrated by data from the FAA’s WebTrak radar system showing 85 helicopter flights between 200 and 900 feet above ground level during a 14-hour period over the Griffith Park area on February 13, 2016; we submitted this data to Regulations.gov subsequent to our petition, and to you at our meeting on April 29, 2016.
- The FAA dismissal letter for our hovering/orbiting petition (FAA-2015-5042) noted FAA success issuing advisory Notices to Airmen (NOTAMs) for planned events; this may be true for a few planned events, but did address other significant helicopter hovering at unplanned events.
- The FAA dismissal letter for our offshore route petition (FAA-2015-5044) stated that most shoreline operations are conducted by single-engine helicopters that need close proximity to the shoreline; the response ignored our concern for the safety of the public on the beach and shoreline.
- The FAA dismissal letter for our offshore route petition (FAA-2015-5044) stated that the FAA has developed a voluntary offshore route in collaboration with stakeholders; while we did participate in early discussions, we were not invited to participate in later collaborations; at our April 29th meeting, you mentioned that the route had changed, but we have not seen the final proposed route.
- All FAA dismissal letters noted geographic, topographic, and climate limitations that force helicopters to fly at lower altitudes; the climate discussions included factual errors and the FAA did not specifically explain how the limitations do not allow higher-altitude operation.
- All FAA dismissal letters noted airspace complexity in Los Angeles County and implied that helicopter operation under Visual Flight Rules in such an airspace precludes flying at higher altitudes; in fact, some helicopters do operate at higher altitudes as recommended by the FAA’s own *Advisory Circular AC 91-36D* (fly 2,000 feet above ground level over noise sensitive areas) and the Helicopter Association International’s *Fly Neighborly Guide* (fly at least 1,000 feet above ground level over noise sensitive areas and higher than that over low ambient noise areas).
- All FAA dismissal letters noted that the FAA has made significant progress and improvements on each of the six actions specified in the 2014 Consolidated Appropriations Act; some progress has been made on the FAA’s development and operation of its helicopter noise complaint system, but the system is still not operating effectively and identifying all helicopters; pilot and community stakeholders have agreed on no voluntary measures; no progress has been made on the most important action which was to evaluate existing routes and “make adjustments to such routes if the adjustments would lessen impacts on residential areas and noise-sensitive landmarks.”

Thank you. We look forward to hearing from you about future collaborations. If you have any questions, please contact me at BobHillsideOrdinance@roadrunner.com or 213-364-7470.

Sincerely,



Bob Anderson
President, Los Angeles Area Helicopter Noise Coalition