Los Angeles Area Helicopter Noise Coalition

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

LAHelicopterNoise.org

July 5, 2016

Vice President **Richard Root**

Association

Citizens for Quiet

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Neighborhood Association **Gerry Hans**

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Rudy Whitcomb Rolling Hills Estates

Wavne Williams Van Nuys Airport Citizens Advisory Council

Glen Martin Regional Administrator Western-Pacific Region

Federal Aviation Administration

Subject: New FAA Helicopter Routes on Los Angeles, Orange, and Ventura County Shorelines

SUBMITTED ELECTRONICALLY

Dear Mr. Martin:

The Los Angeles Area Helicopter Noise Coalition (LAAHNC) is extremely troubled by the FAA's actions in developing new offshore helicopter routes and implementing them on June 22, 2016 along the Los Angeles, Orange, and Ventura County shorelines without any advance notice or consultation.

The new routes are to be flown 750 feet from the coastline as follows:

- · <u>Palisades</u> From Pt. Mugu to the northern end of the SMO Class D Airspace (near Palisades Park)
- · South Bay From Manhattan Beach to the Los Angeles Harbor breakwater
- Coast From Long Beach to Camp Pendleton

As you know, Public Law No. 113-76 (Division L, Title I, Sec. 119D), enacted in January 2014, directed the FAA to "continue to participate in collaborative engagement between community representatives and helicopter operators" in an effort to reduce helicopter noise in Los Angeles County. For the last several years we have represented the community as stakeholders in that "collaborative" process.

Early on it looked like a good faith effort was being made to consider the views of all stakeholders. However, no agreements were reached. At our last meeting, over a year ago on June 11, 2015, the FAA was considering routes at one-quarter mile offshore and it appeared stakeholders might be nearing an agreement. However, after that meeting, apparently the FAA and helicopter pilots continued to meet without us and routes were developed at only 750 feet offshore with no minimum altitude. If pilots follow these routes, it will put many of them closer to shore than they were already flying before the change. Thus, instead of reducing overall noise on the shoreline, it is more likely to increase it.

The FAA implemented the new shoreline routes without informing us of the route descriptions or giving us any opportunity to comment on them prior to implementation. Almost a month before the routes were implemented we read in a helicopter industry publication that the FAA had completed a "safety analysis" and an "environmental review" and was about to "publish" new routes. On May 27, 2016 we e-mailed your staff to verify this story and also asked whether the routes would be made available for public comment prior to implementation. We also requested copies of the FAA's "safety analysis" and "environmental review." However, we never received a response. We do not think these actions by the FAA were consistent with the intent of Public Law No. 113-76.

More importantly, the FAA never gave Los Angeles County, or any of the eleven cities along its shoreline, or the impacted general public, any advance notice of these routes. There was no opportunity for them to consider the issue at all prior to implementation.

The FAA implemented these routes while our formal request for regulations to establish helicopter routes at one-half mile and one mile offshore in Los Angeles County is still pending. More specifically, it comes only days after we filed our formal appeal (June 17, 2016) to the FAA for reconsideration of the FAA's dismissal of our original request "based on the current priorities for the FAA" and without a satisfactory response on the merits of our request.

We believe the FAA's actions in this matter were not only inconsistent with Public Law No. 113-76, they were also contrary to the basic tenets of due process and generally accepted principles of good government, including openness and transparency. Additionally, they seem inconsistent with the spirit (if not the letter) of longstanding laws such as the National Environmental Protection Act, California Environmental Quality Act, and California Coastal Act.

Strangely, the new routes also cover the entire Orange County coastline and part of the Ventura County coastline. Public Law No. 113-76 only mentioned Los Angeles County. Neither Orange County nor Ventura County has ever been discussed at any time during our "collaborative" process.

Accordingly, we call on the FAA to immediately rescind the new routes and restore the status quo ante until the LAAHNC, the general public, and each of the impacted cities and counties have at least been provided with the FAA's rationale for the new routes; copies of the FAA's "safety analysis" and "environmental review" documents; and an opportunity to consider the issue and make comments.

We look forward to receiving your response.

Sincerely,

Richard Root, Vice President

Richard Root

Los Angeles Area Helicopter Noise Coalition

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cc: Senator Dianne Feinstein

Senator Barbara Boxer Congressman Ted Lieu

Congresswoman Maxine Waters Congresswoman Janice Hahn

Congressman Alan Lowenthal

Congressman Dana Rohrabacher Congressman Darrell Issa

Congresswoman Julia Brownley

Congressman Adam Schiff

County of Los Angeles

City of Malibu

City of Santa Monica

City of El Segundo

City of Manhattan Beach City of Hermosa Beach

City of Hermosa Beach

City of Redondo Beach

City of Torrance

City of Palos Verdes Estates

City of Rancho Palos Verdes

City of Los Angeles

City of Long Beach

Orange County
City of Seal Beach
City of Huntington Beach
City of Newport Beach

City of Laguna Beach

City of Dana Point City of San Clemente

Ventura County

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