

LOS ANGELES AREA HELICOPTER NOISE COALITION (LAAHNC) ASSESSMENT OF ACS COMMITTEE (10/26/22)

This is an assessment of the performance of the Automated Complaint System (ACS) Committee since its inception in 2015. It is written from the perspective of the LAAHNC and only includes highlights from meetings held over the span of many years. It is not intended to be a comprehensive list of all the Committee's work.

Background

In 2011 and 2013, bills were introduced in Congress to provide LA County residents relief from helicopter noise. Those bills were not approved by Congress. In 2014, Public Law 113-76 was enacted directing the Secretary of Transportation, as follows:

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;
2. Analyze whether helicopters could safely fly at higher altitudes in certain areas above Los Angeles County;
3. Develop and promote best practices for helicopter hovering and electronic news gathering;
4. Conduct outreach to helicopter pilots to inform them of voluntary policies and to increase awareness of noise sensitive areas and events;
5. Work with local stakeholders to develop a more comprehensive noise complaint system; and
6. Continue to participate in collaborative engagement between community representatives and helicopter operators:

Provided that not later than one year after enactment of this Act, 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 required under the previous proviso.

In 2015, the FAA reported to Congress that the stakeholders were making significant progress and were near to reaching agreements on voluntary measures to reduce noise. Therefore, the regulatory process was never initiated. However, no agreements were ever reached and the stakeholders of the ACS Committee, made up of representatives of the Los Angeles Area Helicopter Noise Coalition, Los Angeles Area Helicopter Operators Association, SOCAL Rotors (formerly Professional Helicopter Pilots Association), Helicopter Association International), and the FAA have continued to meet monthly with the following highlights.

Highlights of ACS Committee Results

County-wide complaint system

In April, 2015, the FAA stood up a County-wide automated complaint system. At that time the Committee spent much of its time discussing the operation of the system and reviewing the data being produced. The FAA continued to fund the system until 2018, at which time it was taken down. In 2022, the FAA produced an analysis of data produced by the system (Los Angeles County Helicopter Noise Automated Complaint System (ACS) *Data Analysis Summary, dated February 2022*). The Automated Complaint

System was successful from the perspective of identifying high complaint areas. In particular, the Griffith Park community (Zip Code 90068) registered the most complaints of any other Zip Code by far (nearly 26% of the total complaints). However, as noted below, stakeholders could not reach an agreement on a specific recommendation to resolve the problem in that area (or any of the other problem areas).

In 2019, the Committee received proposals from complaint system providers. Stakeholders jointly requested that the County of Los Angeles fund a new complaint system. In March of 2020, the County Board of Supervisors directed its Public Works Director to explore the feasibility of joint funding from the County and municipalities with airports in the County and report back in six months. The Committee obtained oral funding commitments from several agencies and helicopter operators. However, in early 2020, COVID 19 hit, airline travel and related revenues declined. Funding sources dried up and the new complaint system was put on hold.

Complaint review process

One of the main purposes of the Committee was to review complaints. It was hoped that the stakeholders could reach agreements on recommended flight standards that pilots could be asked to follow. However, the stakeholders were not able to agree on any recommended flight standards. Nevertheless, the Committee decided to follow-up on flights that were considered “egregious.” Also, while the Committee recognized that emergency responders contribute in large measure to the problem, the vital nature of their work makes it more difficult to address. Therefore, the Committee focused primarily on civilian helicopter flights.

In the last few years, the Committee has reviewed hundreds of flights. In most cases one of the Committee’s pilots followed-up orally or in writing with the offending pilots to encourage them to practice better noise abatement. Most offending pilots were cooperative. But, unfortunately, despite strong efforts at follow-up by Committee pilots, some offending pilots and operators did not respond to repeated requests, and some made only temporary improvement which required repeated follow-up. In addition, the Committee could only review a tiny percentage of problem flights. It could not begin to address the problem in a comprehensive manner. The Committee has no flight data to show there has been any overall improvement.

In the process of reviewing egregious flights, the Committee identified about a half dozen that were so low or close to structures that safety was a concern. These flights were referred to FSDO for investigation and follow-up. However, no actions were taken by FSDO. The Committee met with several of the managers of local FSDO offices to discuss their role. They advised the Committee that they were unable to act because FAA regulations do not specify a minimum altitude and they can only act on violations of FAA regulations.

Offshore helicopter route

In 2016, the FAA implemented a voluntary offshore route asking helicopter pilots to fly 750’ offshore when flying along the coastline of LA County. LAAHNC never agreed to the route believing it was insufficient to reduce noise. After the route had been in place for a few years, the LAAHNC asked the FAA to do an analysis of the results. In August, 2021, the FAA produced a draft analysis with data showing that the offshore route did not result in helicopters flying any farther offshore after the route was established. Due to staffing shortages, the FAA has not yet finalized or published the report.

Long Beach Airport analysis

Local residents began meeting with City Council representatives and Long Beach Airport staff in 2013 regarding helicopter noise concerns specifically on the Redondo Avenue corridor. The Airport staff indicated that there were, on average, 15 flights a day over the local elementary school and the homes in Bluff Heights. Data from the airport staff from 2013-2015 indicated that “no improvement in the helicopter dispersion/noise levels over the neighborhoods adjacent to Redondo Avenue” were found. (Analysis of Helicopter Operations South of LGB dated August 2, 2015.)

Nine official meetings were held to find voluntary solutions to helicopter noise impacts with LGB Airport staff, FAA representatives, pilots, residents and a LAAHNC representative. No viable solutions were accepted by all. In addition, noise monitoring by the Airport staff found two helicopter flights over the elementary school in one week with 81.6 and 82.6 dBA. The school had to discontinue outdoor teaching due to the loud helicopter flights although the World Health Organization guidelines indicated that background noise should not exceed 35 dBA in school environments.

In 2018, a series of videos were prepared to help pilots conform to the LGB arrival and departure routes. In January, 2020, LGB noise abatement staff presented results of their analysis of flights using these routes. They did a pre-video (2017) and post video (2019) comparison which showed very slight improvement in one area; however, the data indicated that there was not enough improvement to provide any noise mitigation.

Long Beach zip codes were consistently in the Top 5 zip code complaints in Los Angeles County using the Automated Complaint System.

Proposed revised stakeholder agreement

In 2015, pilots and residents agreed to Organization and Procedures for the Committee. The agreed upon goal was to “Substantially mitigate helicopter noise impacts on noise sensitive areas.”

In early 2020, LAAHNC proposed a revised stakeholder agreement to better define the collaborative process and urge the FAA to take more active role. After much discussion, the parties could not reach an agreement and discussions were discontinued.

Proposed voluntary flight measures

In 2021, LAAHNC proposed that the ACS Committee jointly recommend additions to the FAA's LA Helicopter Route Chart asking pilots to:

1. Fly at or above 2000' AGL whenever possible (in keeping with the FAA's Advisory Circular 91-36D); and
2. Avoid flying within a one-mile radius of the Hollywood Sign and Griffith Observatory.

Stakeholders on the Committee were unable to reach an agreement on these measures.

Overall Assessment

We estimate there have been at least 75 meetings of the ACS Committee. The stakeholders have put in an enormous amount of time and effort. But there has been a lack of tangible results in terms of overall noise reduction. The number of flights reviewed by the committee is only a miniscule fraction of the number of flights that residents consider annoying. Helicopter pilots continue to fly very low over noise sensitive areas. Flights below 1000 feet AGL are commonplace and in some areas, such as the shoreline, Hollywood Sign, and Griffith Observatory, it is not uncommon to see them flying as low as 200-300 feet above ground level.

Also, one of the Committee's purposes was to provide data to inform the FAA's consideration of future FAA policies. We are unaware of any new or revised FAA regulations or policies that have been influenced by the Committee's work. Helicopter noise in Los Angeles County continues to be a problem.

Therefore, unfortunately, the LAAHNC members of the ACS do not believe the Committee has achieved its original goal of "substantial mitigation."