

8/19/2013

Hon Mayor and City Council Members
City of Torrance
3031 Torrance Blvd
Torrance, CA 90503

Subject: The flying community's concerns and issues with the removal of altitude separation at Torrance Airport

Hon Mayor and Members of the City Council:

At our recent meeting with the FAA's Acting Regional Administrator and his staff, the flying community learned that the City will actively participate in the planning, organizing, executing, and evaluating the "test" of proposed helicopter arrival and departure procedures at the Torrance Airport.

The proposed procedures would remove altitude separation between helicopters and fixed wing aircraft over much of the proposed routes. ***Altitude separation is a vital safety device to prevent mid-air collisions in busy airspace around airports.***

We believe that the test is a politically-driven scheme to solve a non-problem by reducing flight safety. For the past five years, Torrance noise abatement records (Attachment 1) show an average of less than one noise violation per month by helicopters. While a few residents may be annoyed by over flights, no measurement of helicopter noise has been made available to show that they exceed Torrance noise ordinances along the PCH routes.

We have many issues and concerns regarding the routes and altitudes proposed in this plan. We have many questions about the City's role in this "test." We are very concerned about the reduction in safety during the test period itself. The flying community deserves to have its issues understood, to have its questions answered and to have full knowledge about any plans that would reduce flight safety for both local and itinerant flight operations BEFORE the test period begins.

Members of the flying community have already expressed concern (attachments 2-6) with the safety of these procedures you intend to "test:"

- The letter from the President and CEO of Robinson Helicopter to the Torrance Mayor and City Council (dated 1/31/2011) that stated his opposition to the raising of helicopter altitudes and the increased possibility of mid-air collision it would produce.
- Two letters sent to the FAA and the City of Torrance (4/29/2011 and 9/2/2011), with the signature of over 70 Torrance pilots, that objected to the proposed procedures.
- Statements by Mr. Tymczyszyn to the Torrance Airport Commission on 8/11/2011 that pointed out the dangers involved and caused the Commission's subsequent unanimous rejection of the plan because of those safety concerns.
- The statement by a member of the FAA's Safety Risk Management (SRM) panel (the chief flight test engineer from Robinson Helicopter) that all the Robinson pilots object to the plan.

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- The letter from Barry Jay (TAA President) to Mr. Gary Suozzi (FAA) on 7/12/2013 expressing the Association's safety concerns about mixing helicopters and fixed-wing traffic.

ISSUES WITH THE PLANNED TEST

1. Federal Air Regulations, Part 91.129(f)(2), requires helicopter pilots to "avoid the flow of fixed-wing traffic" in Class D airspace (i. e., within 5 miles of the center of Torrance Airport). To comply with the proposed procedures, a helicopter pilot would have to violate that federal regulation. If this resulted in a midair or a documented near-miss, the pilot risks an FAA accusation of operating in "a careless and reckless manner." A wise helicopter pilot will just say "no" to participation in the test.
2. Airport users fly mostly on a VFR "see and avoid" basis. Pilots of fixed wing aircraft have very limited visibility when climbing due to a nose high attitude or when maneuvering due to airframe interference with sight lines and the focusing of the pilot's attention in the direction to which they are turning. Because of their tiny cross section, small helicopters are often extremely difficult to see from the air—especially against a background of ground clutter. Several recent incidents have occurred at the airport in which aircraft took evasive action to avoid a collision with helicopters. The proposed procedures would greatly increase the number of these incidents and evasion may not be successful in all of them.
3. The proposed test period, itself, unnecessarily increases the risk to the flying community. It places the fixed wing pilots in a position where they are required to avoid helicopter traffic they cannot see in a number of conflict areas (Attachment 7). For example:
 - a. The City of Torrance noise abatement procedures recommend that fixed-wing pilots departing from runways 29L and 29R fly runway heading and make no turns until reaching the shoreline or 1500 AGL. The proposed procedures would place helicopters in their path over the shoreline at 1,200 to 1,400 feet (instead of the current 600 feet). Fixed-wing aircraft arriving from Torrance Beach to enter the south traffic pattern (at or above 1,100 feet) for runway 29L would also cross through the helicopter traffic flying along the beach at those same altitudes.
 - b. We often have on-shore low clouds that force aircraft departing runway 29L or 29R to turn south in order to maintain legally required cloud clearance. They will cross the path of arriving or departing helicopters at the same altitude. When runways 11L and 11R are in use, fixed-wing aircraft approaching from King Harbor or Torrance Beach at 1,000 to 1,500 feet would again have to cross through the proposed helicopter routes at the same altitudes.
 - c. Fixed wing aircraft using the south traffic pattern (1,100 feet) for Runway 11R typically fly their base leg between South High and Hawthorne Blvd—just the area where the proposed procedures require helicopters to drop from above 1,200 feet to 600 feet or to climb from 600 feet to 1,400 feet. Aircraft taking off from runway 29L and entering the south traffic pattern will be flying their crosswind leg in this same area.
 - d. Fixed-wing aircraft arriving from the north during busy times are often told to overfly the airport and use the south traffic pattern for 29L. Arriving fixed-wing aircraft reporting over Torrance Beach are directed to use the south traffic pattern for 29L. These aircraft would be turning their base leg between

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Crenshaw Blvd and the gravel pit—again traversing the proposed helicopter routes where the helicopters are climbing or descending.

- e. Fixed-wing aircraft landing on 29L and reporting over San Pedro are often told to fly directly to the runway to avoid aircraft (including jets) landing on 29R.

They would have to pass through the proposed helicopter routes at the same altitude, risking collision with the slower moving and difficult-to-see helicopters.

Over the last 12 months, FAA figures show that Torrance Airport had over 128,700 operations under visual flight rules (VFR). Assuming that 25% of those operations used the south runway, 88 aircraft, on average, operated within the conflict areas EVERY DAY.

4. History has shown that pilots cannot rely on the tower operators to prevent collision. According to the Federal Aviation Regulations (FARs), the ultimate responsibility for safety of the aircraft, its occupants and any other persons or property rests with the Pilot in Command and not, despite the confusing nomenclature, with Air Traffic Controllers. The belief that everything can be handled by ATC – in the absence of common-sense and standard separation of flight paths – is itself a common misconception of those who are not licensed and practiced pilots or who are unfamiliar with the FARs.
5. The fact that TOA is a training tower causes further concern. A fatal mid-air collision between two helicopters in front of the Torrance Airport control tower occurred on the clear afternoon of 11/6/2003. Two people died. Although the National Transportation Safety Board (NTSB) determined that failure of one of the pilots to comply with ATC instructions was the primary cause of the accident, it also noted that a contributing factor was that neither pilot could see the other aircraft prior to the collision. The planned test will reproduce this situation several times per day and at much further distances from the control tower!
6. Although the procedures you propose are “voluntary” for helicopter pilots, any compliance by those pilots with the proposed procedures forces an unavoidable risk increase upon the fixed-wing pilots, who must share the airspace in those conflict areas.
7. Many questions remain unanswered about plans for the test period:
 - What are the current measured ambient and helicopter noise levels on the PCH routes?
 - What actions will the City of Torrance institute during the test period to insure there are no mid-air collisions?
 - Who will be liable for damages if an accident occurs as a result?
 - How do we obtain a copy of the proposed test operations plan?
 - When and how does the flying community get to weigh in on the operations plan for this test?
 - How will the flying community’s comments be incorporated into the test operations plan?
 - Who must approve the test operations plan?
 - What mechanism will be implemented to report and record any flight safety issues/concerns that occur? This should be as simple and easy as it is to make a noise complaint.
 - What data will be collected?
 - Who will collect the data?

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- Who will evaluate the data?
- How will data be made available for review by the flying community?
- What are the evaluation criteria?
- What are the success/failure criteria for the “test”?
- How and when will the test operations plan be advertised to the flying community?
- When and how does the flying community get to weigh in on the evaluation of this test?
- How will the flying community’s comments be incorporated in the evaluation of the test results?

Any proposal to raise helicopter altitudes near the Torrance Airport (or any airport) is a recipe for mid-air disaster. Mixing helicopters with the much faster fixed wing aircraft will pose a danger to all in the air and on the ground. Politically-driven schemes that sacrifice flight safety for noise abatement—especially where no noise problem has been shown to exist--should not be considered.

The flying community believes that there must be **no compromise on flight safety** and that there should be no changes to the current helicopter arrival and departure altitudes—even for a “test.”

We propose a meeting with at least two City Council Members and whatever staff has or will be designated to plan this test. We would like to discuss these questions in greater detail.

Surely, no member of the City Council or the City staff wishes to be responsible for signing off on a plan that could likely

- increase the risk of collisions or, worse yet,
- cause a collision with potential loss of life, or
- expose the City to the liability that would result from such unwise decisions.

We look forward to an early meeting date with your designated City Council Members and appropriate staff.

Sincerely,

Members of the flying community, and

Barry Jay
President, Torrance Airport Association
FAA Safety Team Representative, LGB FSDO

Edward Story
Vice President, Region 4, California Pilots Association
Director, Professional Helicopter Pilots Association

Jack Kenton
Airport Representative Coordinator, California Pilots Association

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Steve Goldsworthy
Director, Professional Helicopter Pilots Association

Jim Gates
Vice President, Torrance Airport Association
Airport Support Network Volunteer, Aircraft Owners & Pilots Association
Airport Representative, California Pilots Association

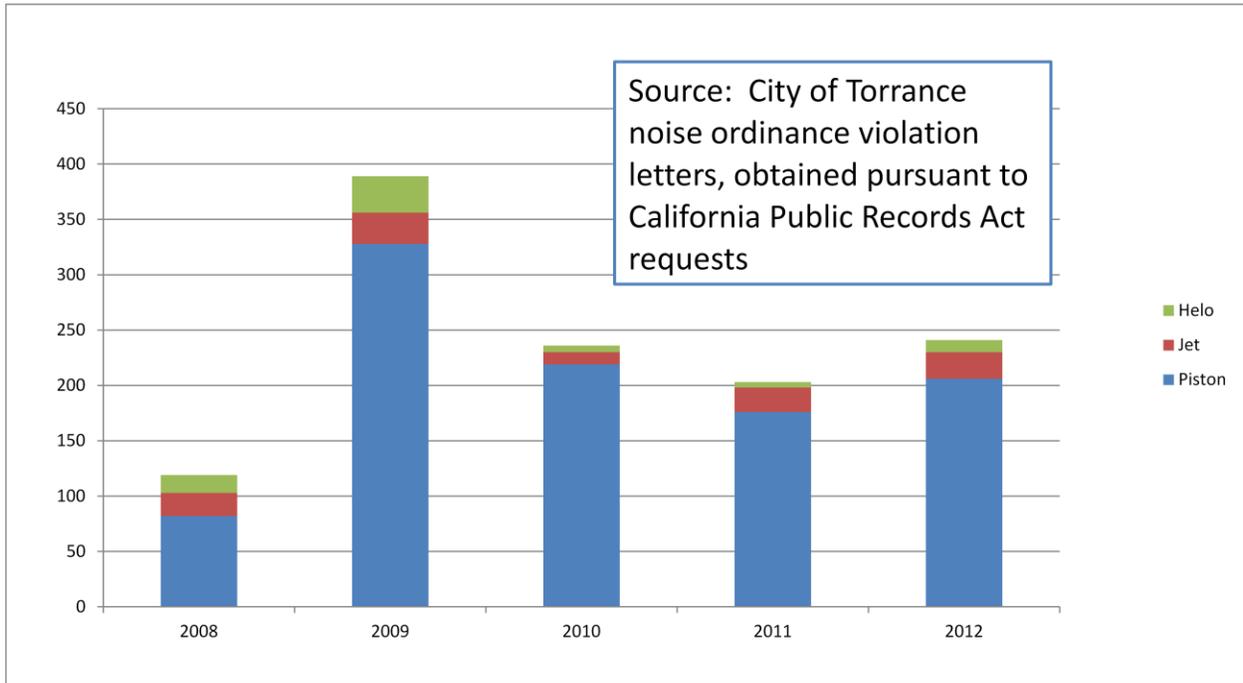
PLEASE REPLY TO:
President, Torrance Airport Association
2785 PCH PMB#E164
Torrance, CA 90505
e-mail: taainfo@aol.com

Attachments:

1. Noise ordinance violations 2008-2012
2. Robinson letter dated 1/31/2011
3. Letter to John Warner, FAA, dated 4/29/2011
4. Comments to Torrance Airport Commission by Bill Tymczyszyn, on 8/11/2011
5. Letter to John Warner, FAA, dated 9/2/2011
6. Letter to Mr Suozzi, FAA, from Barry Jay
7. TOA Traffic Conflicts map

CC: Torrance City Clerk
Torrance City Attorney
David Suomi, FAA Acting Western Region Administrator
Shant Megerdichian

NOISE ORDINANCE VIOLATIONS



Is there really a helicopter noise problem?

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Attachment 2

**ROBINSON
HELICOPTER COMPANY**

2901 Airport Drive, Torrance, California 90505

Phone (310) 539-0508 Fax (310) 539-5198

January 31, 2011

Honorable Mayor and Members
of the City Council
City Hall
Torrance, California

Re: Changes to the Letter of Agreement – Helicopter Operations

Members of Council:

Robinson Helicopter Company, Inc. ("Robinson") opposes any increases in the altitude language set forth in the current Helicopter Letter of Agreement (LOA). Increasing minimum altitude levels would adversely impact safety by increasing the possibility of mid-air accidents, have a negative economic impact on Robinson's business and would not address the noise concerns which originally led to the formation of the Helicopter Committee.

Specifically any new Helicopter LOA would not affect private owners, transient aircraft, law enforcement, fire support, Coast Guard, news agencies or any other helicopter owners or operators identified as the source of noise issues. Robinson, in fact, already maintains policies and procedures to insure compliance with the Helicopter LOA and minimize the noise impact on the South Bay area. Reducing the amount of airspace between fixed-wing aircraft and helicopters would increase the chance of a fatal accident.

We appreciate your careful consideration in this important matter.

Sincerely,
Robinson Helicopter Company, Inc.



Kurt Robinson
President

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Attachment 3

29 April 2011

Federal Aviation Administration AJV-W
1601 Lind Ave, SW
Renton, WA 98057
Attn: Mr John Warner/ANM/FAA Operations Support
Group Manager

Dear Mr Warner:

The undersigned aircraft owners, operators, and users of Torrance Municipal Airport-Zamperini Field (TOA) have serious concerns about the safety of the proposed changes to the helicopter operations at our airport.

Under consideration are increases to the helicopter route altitudes which will remove the altitude separation between helicopter traffic and fixed-wing aircraft traffic. If approved, helicopters will be climbing and descending through the airport's fixed-wing traffic patterns.

The Torrance Airport Commission voted unanimously to REJECT these changes because they, too, had serious safety concerns. In spite of that, the City Council approved the changes and seems to be moving blindly ahead to implement them.

We believe the following criteria MUST be met:

1. That an open, well-advertised comment session should be held for ALL of the users of Torrance Airport to express their concerns to the FAA before any changes are considered. To date, there has been no such process to evaluate these arbitrary and unreasonable proposals.
2. That the FAA should NOT approve any changes that will in any way compromise or reduce safety of airport operations.
3. That the FAA should NOT approve any changes until they have been adequately tested and documented in a test period of at least six months.
4. That the FAA should NOT approve any changes unless they are found acceptable by ALL users of the airport.
5. That the FAA should NOT approve any changes until they are widely disseminated to all current and potential users of the airport—including those based elsewhere.

The FAA Administrator has pledged that there will be no compromise where air safety is concerned. We concur.

James Gates
142 Via Pasqual
Redondo Beach, CA 90277
310-373-7640 -- gatesjh@aol.com

CC: Rex Maclean, FAA/ANM
Sue Herbers, Torrance City Clerk
Heidi Williams, AOPA

This letter was signed by 52 aircraft owners, operators, and users of Torrance Airport

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Attachment 4
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2 SEP 2011

Federal Aviation Administration AJV-W
1601 Lind Ave, SW
Renton, WA 98057
Attn: Mr John Warner/ANM/FAA Operations Support
Group Manager

Ref: FAA letter to Shant Mergerdichian, City of Torrance, dated 15 APR 2011

Dear Mr Warner:

The undersigned aircraft owners, operators, and users of Torrance Municipal Airport-Zamperini Field (TOA) have serious concerns about the changes to the helicopter operations at our airport proposed in the city's letter dated 24 FEB 2011. This proposal would remove the altitude separation between helicopter traffic and fixed-wing aircraft traffic, requiring helicopters to climb and descend through the airport's fixed-wing traffic patterns.

The Torrance Airport Commission voted unanimously to REJECT this plan because they, too, had serious safety concerns. In spite of that, the City Council approved the changes and seems to be moving blindly ahead to implement their plan.

You noted FAA's concerns in your letter, dated 15 APR 2011. On 26 JULY 2011, the city responded to your concerns in another letter. It sidesteps the altitude separation issue by claiming no conflict would exist. The letter states that *"[a]s a result of the desire to keep fixed wing traffic north of the airport at all times regardless of airport configuration (11L/R vs. 29L/R), the traffic patterns do not allow for a south downwind arrival or departure."*

In truth, the south traffic pattern is used often for arrivals from Torrance Beach and Point Fermin. When the north traffic pattern is busy, the tower also often requests fixed-wing pilots arriving from the north to overfly the airport or proceed south along the beach and enter the south traffic pattern for the south runway. As stated before, this would constitute a serious collision hazard with helicopters climbing or descending through the same area.

In addition to the safety concerns expressed to you by 52 signers of their letter to you dated 29 April 2011, we add our concern that the city may plan to take unsafe, unreasonable, drastic, and discriminatory operational changes to implement their plan—just to mollify a handful of vocal homeowners.

Sincerely,

James Gates
142 Via Pasqual
Redondo Beach, CA 90277
310-373-7640 -- gatesjh@aol.com

CC: Rex Maclean, FAA/ANM
FAA Western Pacific Region FSDO
Manager, FAA Los Angeles FSDO
Sue Herbers, Torrance City Clerk
Heidi Williams, AOPA

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Attachment 4
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Additional signers:

Barry Jay
Jim Blake
Gerry Koehler
Arvid von Nordenflycht
Don Ferrara
Nancy Clinton
Monica Cleveland
K Worthey
George Sedillo
Joan Fabian
Al Gibbs
Gus Mavens
Barbara Gates
Mike Turner
Bill Critchfield
Dodie Filler
Art Brock
Frank DeArmond
Lawrence Bean
Charles Lobb
Daniel F. Schaefer
Ginette Aelony
David Duntz
Kurt Rasmussen
Mary Falstrom
Ken Lehmer
Rory G, Pendley
Dennis C. Lord
Phil Wyels
Lenna Harnett
Paul Hill

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Attachment 5

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Comments to Airport Commission 8-11-11
Bill Tymczyszyn

Historical Comments:

1. Last year, after a review of the Helicopter Committee's recommended changes to the routes and altitudes of the 3 most southerly routes, the Airport Commission voted unanimously against recommending these changes onward to the Torrance City Council. Staff liaison chose to pass on the Committee's recommendations to Council without the Commission's recommendation. In a long Council meeting last February 1st, both sides of the argument were heard, and Council basically asked the Committee to go back to work and come to agreement.

2. On Feb 24th, Staff liaison sent these route change proposals to the FAA in Renton, WA, requesting approval for a 6 month evaluation.

3. Since February, the Helicopter Committee has met numerous times. Nevertheless, the 3 routes remain essentially unchanged, as committee members have been unable to agree on changes. Local fixed-wing and helicopter pilots have spoken in opposition to the proposed changes at these meetings.

4. Pat Carey, Vice-Chairman and an experienced local pilot, has resigned from the committee in frustration. When other members were asked to accept a nomination to replace him, no one stepped forward. Chairman Pete Elmore then announced that he was moving out of the area and leaving the committee. In addition, Mr. Lazaro Arteaga, the TOA tower chief, announced that he was leaving the facility and the committee. He did not commit to replacing himself with another representative from the TOA tower. One clearly felt a sense of urgency on the part of some of the committee members.

Communications from FAA

1. The FAA responded to Shant's original letter containing the Helicopter Committee's recommendations, but the FAA concluded regarding the 3 southerly routes - "All the revised routes appear to move helicopters into the fixed-wing flows by requiring a higher altitude than is used currently." The FAA rep then quoted FAR 91.129, re operations in Class D (TOA tower airspace): "helicopter pilots must avoid the flow of fixed wing traffic." Clearly, Mr. Warner of FAA sensed the same reduction in the margin of safety that I shared with the Airport Commission and City Council, which would force slower helicopters up to fixed-wing aircraft altitudes in airspace common to both types.

Shant's July 26 response to FAA –

1. Regarding this letter, one of the Helicopter Committee members told me - "This letter was a staff response to the FAA, not a Committee response. A sub-committee made up of Richard Root and Peter Elmore was formed and approved by the Helicopter Committee to formulate a response to the FAA. This sub-committee worked with Shant to generate the letter, and the Committee as a whole was sent a copy via email. Again, this strategy was approved by the Helicopter Committee."

2. The full helicopter committee did not approve this letter, it was formulated by a subcommittee of two, and signed by Shant. What has happened here is an end-around run. Since the full Helicopter Committee, meeting in public, has been unable to agree on ANY substantive changes to the proposals that this Airport Commission turned down and the FAA objected to, the two most prominent members (Mr. Elmore and Mr. Root) have restated their long-standing positions, and Shant has sent the letter to the FAA under his signature.

3. Within the letter it states that the "TOA tower chief (Lazaro Arteaga) and/or his designee attended every committee meeting and their input was sought at every turn. Mr. Arteaga is a voting member of the committee..." May I add a couple personal comments. Mr. Arteaga's input may have been sought, but it was rarely offered. Mr. Arteaga is a man of few words. Secondly, even though Mr. Arteaga is a voting member of the committee, he abstained from the votes held at the last two public meetings on changes to routes. It is my feeling that he is trying to distance himself from this entire process, especially after FAA officials in the Air Traffic Office have expressed their objections to the safety of the proposed changes.

4. The letter also states "As a result of the desire to keep fixed wing traffic north of the airport at all times, regardless of airport configuration (11L/R vs. 29L/R), the traffic patterns do not allow for a south downwind arrival or departure." If Mr. Elmore were a local pilot, he would know that the south traffic pattern for Rwy 29L and 11R is alive and well and used on a regular basis. It makes possible shorter arrivals from the southwest for airplanes returning from the PV practice area, and allows departures to the SE for other aircraft. The south pattern is active and legal, and allowed on request by the FAA tower, who enforce FARs, not TOA municipal code.

5. The letter further states, "As all 3 proposed routings remain well south of the airport and the extended centerlines of the runways, we found no conflict with fixed wing traffic within the Class D, regardless of altitude." Was anyone listening? 1500' is a normal fixed wing altitude for arriving aircraft reporting over Vincent Thomas Bridge, on the extended centerline of runways 29L & R. 1200' and 1400' along PCH to the west of TOA is not uncommon for departing aircraft, and is certainly a legal altitude. These conflict areas, however, are precisely what Mr. Elmore and Mr. Root continue to try to push through.

Final Comments –

1. The Helicopter Committee is in trouble. The Chair is leaving, the Vice-Chair is gone, and the tower chief will leave soon. In the meantime, the Committee has failed to come to agreement on changes to the routes to satisfy FAA's concerns about mid-air collisions. In what appears to be a final act of desperation, the Committee Chair along with Mr. Root have written a detailed defense of the same problem routes that have been hashed over repeatedly since the Council meeting last Feb. The end of the letter reads as if written by a PhD in Federal Aviation Regulations. "14 CFR 91.129 requires compliance with 91.126 and 91.127 which each requiring communications with the ATCT 4 NM from the airport. This leaves 0.11 NM of routing outside the requirements of this paragraph. At a cruise speed of 110 kts, an estimated 3.6 seconds of flight time." It sounds like Shant is now a Commercial pilot. I don't believe City Staff should be signing the letter as if it were written by the

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Attachment 5

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"Facilities Operations Manager", giving the impression that city government understands and buys into this. I believe this entire approach is an attempt to mislead the FAA into believing that the Helicopter Committee, the City, and the Torrance pilot community are in full agreement with these proposals. The Airport Commission didn't buy it, the City Council didn't buy it, and the Helicopter Committee did not approve it. The President of Robinson Helicopter Company didn't buy it, and told the Council that if enacted, his company would most likely not sign the LOA because of safety concerns.

2. Local pilots like myself are now tasked with writing the FAA to again voice our concerns about the safety of these proposals, and the convoluted process that returned them to the FAA for a 2nd time. City government may be able to solve some civic issues through compromise, but safety must never be compromised or take a back seat to convenience.

Thank you,
Bill Tymczyszyn

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Attachment 6
Page 1

Dear Mr. Suozzi,

Since only a couple of Torrance Area pilots attended the SRMD session I thought you might appreciate the perspective from a broader user base regarding the proposed changes to helicopter routes into/out of TOA. We are the Torrance Airport Association with over 100 pilots (mostly fixed wing) that fly out of TOA on a regular basis. We have serious concerns regarding the proposed changes to two of the routes proposed by the City of Torrance and reviewed by the SRMD that may be utilized during the test period: the West Pacific Coast Highway and the Southeast Arrival/Departure routes.

It's our understanding that the ground track for the West PCH route will not change but the altitudes for helicopters will be increased to 1,200' MSL for departures and 1,400' MSL for arrivals along Pacific Coast Highway. These altitudes present a High Risk to flight operations and as example we submit the following.

Low-powered training aircraft such as Cessna 150s have a sea level rate of climb of 400 to 500 ft./minute at Gross Weight. When departing runway 29L, lifting off at mid-field and climbing out at about 65 mph, such aircraft will reach the shoreline (Torrance Beach) at somewhere between 1,200 and 1,500' MSL in light wind conditions. Even if the pilot maintains runway heading, if the winds are from the Northwest it is likely that the aircraft will drift left of the runway centerline and could easily cross ground tracks with helicopters approaching from the shoreline along PCH.

Helicopters approaching along the West PCH arrival route will be slightly North of PCH at or below 1,400' MSL so it is highly likely that the fixed wing will be climbing into and the helicopter descending into each other's flight path.

Conversely, if a helicopter is departing TOA via the West PCH route (staying slightly South of PCH) and a fixed wing approaches on a direct down-wind entry for 29L (left traffic) from the shoreline, the helicopter is climbing to the target 1,200' MSL altitude while the fixed wing is descending to pattern altitude of 1,100' MSL.

Again, these aircraft are on a potential collision course and since the helicopter will likely be lower than the fixed wing it will be extremely difficult to spot by the pilot of the fixed wing since it will be lost against the ground clutter (especially if it's a darkly painted R-22, R-44 or R-66).

Regarding the Southeast Arrival/Departure route proposed for the helicopter noise test we have similar concerns. The proposal, as updated, suggests that the helicopters arrive at the Palos Verdes Reservoir at or above 1,200' MSL. The ground track to get to the reservoir is up to the PIC. If fixed wing aircraft approach using the extended centerline for a direct arrival to 29L or 29R this would not cause a concern. However, fixed wing aircraft often report over Point Fermin or San Pedro and once two-way communication is established with the Tower, proceed directly to 29L to stay South of the flight path of aircraft headed straight in for 29R.

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Attachment 6
Page 2

If the fixed wing aircraft is at Point Fermin at 2,000 – 2,500' MSL then descends at 500 ft./minute or more, they could easily cross paths with a helicopter on its way to or departing from the reservoir.

Again, with the helicopter being at a lower altitude than the fixed wing, it will be difficult for the PIC in the fixed wing to spot the helicopter against the ground clutter. These are just a few of the many scenarios we can think of that create great concern for the people in the air and on the ground if the helicopter noise test moves forward with the proposed helicopter routes & altitudes. We feel quite strongly that the proposed ground tracks and altitudes suggested for the West Pacific Coast Highway and Southeast Approach/Departure helicopter noise test create a High Risk to both the helicopters and fixed wing aircraft operating on the South side of TOA if they are not modified to ensure altitude and ground track separation of helicopters and fixed wing.

If you have any questions or would like to discuss this issue I would be pleased to do so.

Sincerely,

Barry Jay
President, Torrance Airport Association
FAASafety Team Representative, LGB FSDO

TOA TRAFFIC CONFLICTS



CONFLICT AREAS

- A: Helicopters 1200-1400 MSL
Fixed Wing 1100+ MSL
- B: Helicopters 1200-1400 MSL
Fixed Wing 800-1500 MSL
- C: Helicopters 200-1400 MSL
Fixed Wing 500-1100 MSL
- D: Helicopters 200-1100 MSL
Fixed Wing 500-1000 MSL
- E: Helicopters 1000+ MSL
Fixed Wing 1000-2000 MSL

