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CRITIQUE OF THE PLAN TO REMOVE ALTITUDE SEPARATION AT TORRANCE AIRPORT

The FAA's web site states: **"Our continuing mission is to provide the safest, most efficient aerospace system in the world."** The flying community supports that mission, but we have some serious issues with the activities the FAA has recently performed at the Torrance Airport and whether those actions support the FAA Mission.

ISSUES WITH THE FAA SAFETY RISK MANAGEMENT (SRM) PANEL

The SRM process used in the meeting at Western Pacific Regional HQ in June 2013 is familiar to many of us in the aerospace industry. It has produced a highly successful launch history for that industry. A similar process is used by that industry in the launch readiness review (LRR), but with a few notable differences:

1. The members of the LRR panel are all subject matter experts and those whose jobs and/or lives are on the line. The SRM panel was picked with a small minority of actual TOA pilots (the ones whose safety of flight will be reduced).
2. All involved parties are included in the LRR meetings. The SRM panel was very exclusive and representatives of the Torrance Airport Association (over 100 members), California Pilots Association (over 1000 members), and Aircraft Owners and Pilots Association (over 385,000 members) were not allowed to participate in, or even to monitor, the panel activity.
3. After the Shuttle Challenger launch failure, all LRR decisions are made by consensus and ALL safety issues are identified. The SRM panel, consisting primarily of FAA non-pilots, out-voted the objections of the pilots that mid-air collision should be included in the risk assessment—in spite of the multi-fatality mid-air collision of two helicopters that occurred at the airport on 6 November 2003.
4. All LRR issues are identified and recorded in the minutes and action items. The SRM draft report did not mention the wide objections of the flying community already registered:
 - Two letters already sent to the FAA (4/29/2001 and 9/2/2011) with the signature of over 70 Torrance pilots objecting to the proposal.
 - The Torrance Airport Commission rejected the plan because of safety concerns on 8/11/2011.
 - A member of the SRM panel (the flight test engineer from Robinson Helicopter) made a statement to the SRM Panel all the Robinson pilots refuse to comply with the plan.
5. The LRR compares all changes to an established baseline. The SRM did not compare the risk of making the proposed changes with the risk of making NO CHANGES.

ISSUES WITH THE FAA PROCESS

1. Most of the process has so far been held behind closed doors.
2. The process, itself, is obscure. No roadmap has been provided to the aviation community. No responsible FAA personnel have been identified for the process.
3. Recent events indicate that the local FAA control tower has already eliminated altitude separation and is routinely inserting helicopters into the fixed wing traffic pattern at the same altitude—all with NO notice to those whose safety has been compromised by that action.
4. Several conflicts between helicopters and fixed wing aircraft (including one near-collision) have occurred in the last several weeks. No mechanism for reporting them has been identified.
5. Many questions remain unanswered about the risk evaluation process:

- When and how does the flying community get to weigh in on the risk evaluation process for this test?
- How will the flying community's comments be incorporated into the risk evaluation?

ISSUES WITH THE PLANNED TEST

1. The proposed test period, itself, unnecessarily increases the risk to the aviation community. It places the pilots in a position where they are required to avoid other traffic they cannot see. The NTSB that as the probable cause of the November 2003 mid-air collision over the airport.
2. The test is a politically-driven attempt to solve a non-problem by reducing flight safety. For the past three years, there has been less than one noise violation per month by helicopters.
3. 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. The LOA 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.
4. When on-shore low clouds force a pilot departing runway 29L to turn south to maintain legal cloud clearance, he would cross the path of arriving or departing helicopters.
5. When runways 11L and 11R are in use, fixed-wing aircraft approaching from King Harbor at 1,000 to 1,500 feet would again have to cross through the proposed helicopter routes (at 1,200 to 1,400 feet).
6. Fixed-wing aircraft using the south traffic pattern for Runway 11R (1,100 feet) would fly their base leg between South High and Hawthorne Blvd—just the area where the LOA requires helicopters to drop from above 1,200 feet to 600 feet or to climb from 600 feet to 1,400 feet.
7. 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.
8. Arriving fixed-wing aircraft reporting over Torrance Beach are directed to use the south traffic pattern for 29L. 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. These aircraft would be flying directly into the arriving helicopters and would be turning their base leg between Crenshaw Blvd and the gravel pit—again traversing the proposed helicopter routes where the helicopters are climbing or descending.
9. Many questions remain unanswered about plans for the test period:
 - 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 will be the test duration and starting time?
 - What mechanism will be implemented to report and record any flight safety issues that occur?
 - What data will be collected?
 - Who will collect the data?
 - 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?
- 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?

ISSUES WITH THE PROPOSED CHANGES

1. All of the safety issues identified above for the test period would also apply to any plan to raise helicopter altitudes on the PCH routes.
2. The proposed changes in helicopter operations are a politically-driven attempt to solve a non-problem by reducing flight safety. For the past three years, there has been less than one helicopter noise violation per month recorded on the Torrance noise monitors!
3. When and how does the flying community get to weigh in on any proposed changes?
4. How will the flying community's comments be incorporated into any proposed changes to operations?
5. How and when will the operational changes be advertised to the flying community?

SUMMARY

Airport traffic flies mostly on a "see and be seen" basis. Helicopters are very, very difficult to see from the air—witness the fatal mid-air collision between two helicopters in front of the Torrance Airport control tower on the clear afternoon of 11/6/2003. Two people died. Fortunately, the wreckage did not fall on someone's house!

We live beneath the busiest and most complex airspace in the world—options for safe change are extremely limited and would have far-reaching effects on flight safety throughout that entire airspace.

Any proposal to raise helicopter altitudes near the Torrance Airport is a recipe for mid-air disaster. Mixing helicopters with aircraft will pose a danger to all in the air and on the ground. The flying community deserves to know about any plans to reduce their flight safety.