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July 21, 2010

Mr. Clark Desing
Operations Support Group, AJV-W2
Western Service Area, Air Traffic Organization
Federal Aviation Administration
1601 Lind Avenue SW
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RE: Proposed Establishment of Class C Airspace over Long Beach/Daugherty Field

Mr. Desing,

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) proposal to establish Class C airspace over Long Beach/Daugherty Field Airport (LGB) in Long Beach, CA. Based on the lack of justification and the need for a much broader airspace analysis, AOPA opposes the establishment of Class C airspace over LGB and strongly urges the FAA to follow its own advice as highlighted in a 1991 withdrawal of a Notice of Proposed Rulemaking (NPRM) that would have established an Airport Radar Surveillance Area (ARSA) over LGB.

AOPA opposes the reclassification of LGB airspace based on multiple concerns and the significant impacts it would have on the surrounding Los Angeles airspace area. In the most recent proposal, the FAA has failed to provide documented evidence that a safety issue exists or that existing collision avoidance alerts would be solved by the establishment of Class C airspace. In addition, non-rulemaking options that could have an immediate, positive impact on safety near LGB have been dismissed without consideration by the FAA. Finally, the FAA failed to follow the mandate of FAA Order JO 7400.2G which requires publication of the details of the proposed airspace action in the Federal Register. We recommend that the FAA withdraw the proposal and begin a comprehensive review of the entire Los Angeles metroplex airspace area.

Long Beach Airspace Should be Addressed in Larger Context of the Los Angeles Metroplex

In 1991, the FAA withdrew a NPRM that would have established an ARSA over LGB. The FAA stated that "...the establishment of the Long Beach ARSA would increase the overall airspace complexity in the Los Angeles Basin. Currently, the Los Angeles Basin airspace is composed of 1 terminal control area, 6 airport radar service areas, 25 control tower facilities, and 4 military facilities. The amount and complexity of this airspace dictate a need to modify the entire Los Angeles Basin airspace to make it more compatible with the increasing amount of general aviation and air carrier activity."

Without question, the Los Angeles Basin airspace is more complex and congested than it was in 1991. Rather than address issues in isolation, AOPA requests that the FAA take a comprehensive approach to the entire Los Angeles area. The airspace over Los Angeles is so complex that a solution cannot be successful without taking the surrounding airspace into account. Despite the FAA's recommendation that the LGB airspace should not be reclassified without a much broader review of the Los Angeles airspace area, a comprehensive review has never been conducted and the FAA has failed to follow its own guidance in a very complex terminal airspace that would benefit from a comprehensive review.

Lack of Data to Justify Class C Airspace

To date, the FAA has not released any documented evidence of a safety risk due to Traffic Collision Avoidance System (TCAS) events in the Long Beach area. The purpose of a TCAS system is to alert pilots to potential threats of a midair collision – something that should never happen between two aircraft under Air Traffic Control direction in controlled airspace such as the existing LGB Class D. The safety threat is not in the number of TCAS events but the procedures used by Air Traffic Controllers in and around the LGB Class D and the possible need for amended operating procedures by commercial operators arriving and departing LGB.

According to TCAS data obtained through a Freedom of Information Act (FOIA) request, there were 22 TCAS events in the LGB area during a 5 month period. Of these events, 1 occurred within the LGB Class D airspace, 9 occurred outside of the proposed Class C airspace, and 10 were corporate operations that could not be substantiated. Using this data as justification for establishing Class C airspace is flawed and Class C airspace would not resolve the conflicts that are occurring in existing controlled airspace. Rather, ATC procedures along with a review of pilot training and standard operating procedures would have an immediate, positive impact on the number of TCAS events. Considering the lack of a substantiated hazard, the establishment of Class C airspace over LGB is a solution looking for a problem.

FAA Must Consider Nonrulemaking Alternatives

The establishment of Class C airspace over LGB will not cause a substantial reduction in the number of critical TCAS alerts. However, improvements to departure and arrival procedures can be implemented immediately with a positive impact on safety. According to paragraph 16-1-2 of FAA Order JO 7400.2G, before initiating rulemaking actions to establish Class C airspace, the FAA is required to exhaust *all* nonrulemaking alternatives that provide for an acceptable level of safety. Airspace actions can take two or more years, while improvements to procedures can be implemented today. Formal suggestions by the Southern California Airspace Users Working Group (SCAUWG) to alter the departure course of airlines departing LGB have been dismissed without consideration. These improvements would route LGB departures west over Palos Verdes, bringing them into the protection of LAX's Class B airspace more quickly. At a minimum, all potential procedural and pilot training initiatives should be exhausted as part of a more comprehensive airspace review of the entire Los Angeles metroplex area.

Class C Airspace Poses Significant Impacts on VFR Operations

Los Angeles contains some of the most complex and congested airspace in the country. The establishment of additional, non-standard controlled airspace would increase the complexity of the airspace and cause a decrease in overall safety for the entire area. Pilots will be forced to spend even more time “heads-down” in the cockpit trying to ensure they remain clear of controlled airspace, are communicating on the right frequency, and are on course to their destination.

Beach Boulevard west of John Wayne airport represents a prominent visual landmark used by pilots transitioning between Fullerton Airport and the Visual Flight Rules (VFR) practice areas off the coast. Under the proposed airspace plan, traffic operating on this route would be compressed to less than 1,500 feet of vertical space when operating south of Los Alamitos (SLI). With less than 1,500 feet of altitude available and just 2 miles of lateral separation between the surface areas of John Wayne and Los Alamitos, the separation of opposite direction traffic would be reduced to dangerous levels, increasing the likelihood of a mid-air collision.

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Pilots transitioning east-west in the area north of LGB currently fly above 2,600 feet and utilize the Riverside Freeway to remain clear of the LGB Class D airspace. If the proposed Class C airspace is implemented, these operators would be forced to climb above 3,400 feet, placing them in direct conflict with aircraft operating south of LAX on the Mini Route and the LAX Special Flight Rules Area (SFRA). Alternatively, pilots would be compressed into a 1 mile wide corridor between LGB's Class C airspace and the LAX Class B airspace. A 1 mile wide corridor is a trap for airspace violations and creates an unsafe situation. This area will have a significant funneling effect and will increase the likelihood of a mid-air collision between general aviation traffic attempting to remain clear of the Class B & C airspace.

General aviation pilots at Compton (CPM), particularly training flights, depart CPM and proceed south along the Harbor freeway to reach the practice areas over San Pedro Harbor. These operators would be forced to altitudes below 1,500 feet which is not sufficient for opposite direction traffic. Pilots who request to fly through controlled airspace will likely be held over Alondra Park until they can be accommodated. Alondra Park is surrounded by controlled airspace and is extremely congested with aircraft climbing or descending for the Mini Route and LAX SFRA and east-west traffic operating north of LGB. The proposed Class C airspace will compound this congestion and decrease the amount of airspace available to operators in this area.

The airspace off the coast in areas C and D of the LGB proposal are currently used for intensive flight training. Due to the complex and congested nature of the airspace over land in the Los Angeles Basin, flight instructors utilize practice areas located off the shoreline. The proposed establishment of Class C airspace over LGB will drastically reduce the amount of airspace available for flight training off the coast. With altitudes as low as 1,500 feet, aircraft will be unnecessarily compressed or pushed far beyond safe gliding distance from the shoreline, especially at these low altitudes.

FAA Should Follow Guidance in FAA Order JO 7400.2G

Section 6 of FAA Order JO 7400.2G provides requirements for the Informal Airspace Meetings. Paragraph 2-6-3 contains a requirement to "describe the proposal in sufficient detail, including charts, if necessary, to enable interested persons to prepare comments *prior to the meeting*." No such description was ever provided in the Federal Register or in local media outlets and multiple requests for the information were declined.

By failing to provide details about the proposal ahead of the informal airspace meetings, the FAA denied the public an opportunity to develop arguments for or against the proposal. AOPA questions the value in soliciting comments just minutes after disclosing the details of the proposal. We request that in future airspace actions, the FAA adhere to the mandates of FAA Order JO 7400.2G and provide complete details of the proposal well in advance of the informal airspace meeting.

Summary

As proposed, the establishment of Class C airspace over Long Beach airport is not a viable option. As the FAA indicated in 1991, the entire airspace area over the Los Angeles Basin should be reviewed and amended as a whole, rather than individual areas in isolation. The FAA has failed to provide documented evidence of any safety risks in the terminal area that would be mitigated or addressed by the establishment of Class C airspace. In fact, the establishment of Class C airspace poses significant negative impacts on general aviation

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operators to, from, and around Long Beach airport. In some cases, these impacts will significantly compress and funnel general aviation traffic leading to an increased risk of midair collision. Finally, the FAA should have provided a detailed description of the proposed airspace prior to the Informal Airspace Meetings. We appreciate the opportunity to provide comments on the proposed establishment of Class C airspace over Long Beach and strongly urge the FAA to withdraw this airspace action and follow their own recommended action of a broader review of the entire LA Basin airspace.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Kramer". The signature is written in a cursive, flowing style.

Tom Kramer

Manager

Air Traffic Services