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Mr. John Warner
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Federal Aviation Administration
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RE: Establishment of Class C Airspace over Long Beach/Daugherty Field

Mr. Warner,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) plan 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 remains opposed to 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. Despite repeated requests by AOPA and multiple other organizations and individuals, the FAA has not provided any documented evidence that a safety issue exists at LGB or that alleged collision avoidance alerts would be solved by the establishment of Class C airspace. In addition, options to expand the Class D airspace instead of reclassifying it as Class C airspace have not been explored. AOPA recommends that the FAA withdraw plans for Class C airspace at Long Beach and begin a comprehensive review of the entire Los Angeles metroplex airspace area.

Lack of Data to Justify Class C Airspace

The FAA repeatedly points to Class C thresholds outlined in FAA JO 7400.2 and Traffic Collision Avoidance System (TCAS) alerts as justification for Class C airspace at Long Beach. The passenger enplanement and IFR operation counts detailed in FAA JO 7400.2 set a threshold for the consideration of Class C airspace; it does not *require* the establishment of Class C airspace. Despite repeated requests by AOPA and other organizations and individuals, the FAA has not released any documented evidence of an existing safety concern in the Long Beach area. Exactly what data are driving this airspace plan?

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. It appears the safety threat is not in the number of TCAS events but rather 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 these 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. The two most common concerns mentioned in the 1,400+ comments the FAA received was a call for justification of the planned changes and a comprehensive review of the southern California airspace area. The FAA has done neither.

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.

FAA Should Consider Expanded Class D airspace

The FAA has stated that one of the key goals of establishing Class C airspace at LGB is to require more aircraft to participate in two-way radio communication with ATC. This can be accomplished with an expansion of the existing Class D without the inherent difficulties, frustrations, and restrictions of Class C airspace. Recently, the FAA established two sectors of Class D airspace north and south of the Los Angeles Class B surface area. This demonstrates a willingness to utilize Class D airspace to address containment issues. Expansion of Class D airspace would also be in keeping with the FAA's goal of utilizing the least restrictive airspace classification possible to preserve and promote safe flying.

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. Compounding this complexity is the variable-height ceiling that the FAA offered during the second round of informal airspace meetings. While AOPA is not opposed to this concept, the LGB airspace area is nestled in an overly complex area of the national airspace system that cannot accommodate this type of out-of-the-box variable ceiling design without a much more comprehensive look at the surrounding airspace.

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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 into a funnel just 1,200 feet thick above the Torrance Class D and below the LGB Class C. This is insufficient vertical space 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 Special Flight Rules Area and east-west traffic operating north of LGB – two very needed and critical Visual Flight Rules corridors used by general aviation operators in the LA basin. The proposed Class C airspace will compound this congestion and decrease the amount of airspace available to operators in this area.

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 not provided 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 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. Expanding the Class D airspace to increase participation in two-way communication would accomplish the FAA's goal while utilizing the least restrictive airspace possible. 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,



Tom Kramer
Manager
Airspace and Modernization