



U.S. Department
of Transportation

**Federal Aviation
Administration**

Office of the Administrator

800 Independence Ave., S.W.
Washington, D.C. 20591

May 18, 2012


The Honorable John A. Yarmuth
House of Representatives
Washington, DC 20515

Dear Congressman Yarmuth:

Thank you for your April 17 letter seeking additional information about Bowman Field's obstruction removal program. We have enclosed responses to the follow-up questions identified by your constituents. The Federal Aviation Administration is working closely with the Louisville Regional Airport Authority on this program to ensure it follows our regulations and policies.

If I can be of further assistance, please contact me or Roderick D. Hall, Assistant Administrator for Government and Industry Affairs, at (202) 267-3277.

Sincerely,



Michael P. Huerta
Acting Administrator

Enclosure

**Responses to Follow-up Questions
Regarding the Louisville Regional Airport Authority and Bowman Field**

Question 1: In Question 2(a), you indicated that the requirements for clearing obstructions for the appropriate approach surfaces are not new, and that the FAA “has not adopted new safety standards that would serve to increase the size of the areas to be cleared for existing approach procedures.”

By way of further clarification,

- a. Had Bowman Field been operating with a waiver for compliance with the approach procedures under TERPS, and has that waiver been removed? If so, when was the waiver removed or terminated and what was the basis for removal or termination?
- b. The LRAA indicates that it was shut-down for non-compliance with obstruction clearance obligations during the summer of 2010. Please explain whether and to what extent there was a shut-down of Bowman Field and whether that shut-down was related to the removal or termination of a waiver of compliance with obstruction clearance obligations. If the impact to operations was related to obstructions, when did FAA determine that there would be an “adverse effect” to flight operations from existing obstructions? Finally, are those obstruction clearance obligations related to instrument flight procedures or to all flights?

FAA Response:

- a. As stated in our response to your February 17 letter, the Federal Aviation Administration (FAA) has not given a waiver to night operations to any runway at Bowman Field. However, FAA Order 8260.3B, United States Standard for Terminal Instrument Procedures (TERPS), does allow the use of a clear visual glide slope indicator to mitigate 20:1 visibility surface penetrations. This mitigation is in use on Runway 6 at Bowman Field.
- b. There was never a complete “runway shut-down” due to approach penetrations. A biannual review was conducted in the summer of 2011. This resulted in the removal of night approach procedures to Runways 24 and 33. A Notice to Airmen was issued on July 1, 2011, to this effect. The FAA coordinated with the Louisville Regional Airport Authority (LRAA) to identify and mitigate (trees) obstructions of the visual approach surfaces for all runways. From these coordination efforts, night minimums were restored with the removal of these obstructions. However, one penetration of the Runway 24 instrument approach surface remains in effect. Consequently, Runway 24 lost vertical approach guidance (LPV) on December 15, 2011. In cooperation with the LRAA, the FAA has redesigned the procedure with a higher Threshold Crossing Height due to the remaining obstruction. On July 26, the approach procedure will be published, restoring LPV guidance to Runway 24.

Question 2: In Question 13, you indicated that you did not have a copy of the map showing a wider and longer swath of area for which obstructions were to be evaluated and removed. A copy of the map can be found on page 9 of the enclosed document, and can be reviewed online at this link:

<http://www.flylouisville.com/clientfiles/upload/Overview%20Bowman%20Area%20Safety%20Program%20Revised%201-19-12.pdf>

The questions regarding the map are:

- a. Is the length and/or width of the shaded area at the end of each runway, that the LRAA has informed the neighborhoods will be evaluated for obstructions, the result of FAA mandate or a specific aeronautical study?
- b. Is the proposed area designed in a manner consistent with FAA mandate, or is it more narrow or wider, shorter or longer than what is required by FAA guidance mandate?
- c. Are the length and width of those areas to be evaluated for obstructions for instrument arrivals, and those areas evaluated for obstructions with respect to instrument departures the same? If not, how are the [they] different?
- d. Are all Bowman Field runways approved for instrument arrivals and departures? If not, please identify which are approved for instrument arrival and departures.
- e. If less than all runways are approved for instruments arrivals and departures, is there a necessity to evaluate those runways that are not approved for instrument arrivals or departures, using the 40:1 TERPS surface rather than the 20:1 Part 77 surface?

FAA Response:

- a. The shaded areas at the end of each runway in the graphic provided are standard departure surfaces applicable to all instrument flight rule (IFR) runways. This is a result of LRAA's Airport Layout Plan update dated December 2008.
- b. This is consistent with TERPS criteria.
- c. As stated in our previous response to Question 10 "the TERPS criteria is applied to runways that have procedures involving precision approaches, any approaches [with vertical guidance], any nonprecision approaches, and any departing procedures. If a runway is not TERPS compliant, it will be limited to visual approaches only. The LRAA determines runway utilization for all runways at Bowman Field."
- d. All runways at Bowman Field are capable of IFR arrivals and departures; therefore, the 40:1 TERPS surface is applicable to all runways. Currently, all runways have approved IFR departure procedures. Only Runways 24 and 33 have published straight-in procedures.

- e. Our evaluation is based on all applicable criteria, including TERPS and part 77 surfaces. This evaluation identifies any possible obstructions to each approach surface. Consequently, visual and/or instrument approach procedures are determined based on the airport's ability to mitigate identified obstructions.