



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED
11/19/21
04:59 PM

C2111019

The Acton Town Council,

Complainant,

vs.

Southern California Edison Company (U338E),

Defendant.

Case (C.) _____

Complaint
(Rule 4.2)

COMPLAINANT	DEFENDANT
<p>The Acton Town Council Attn: Jacqueline Ayer P.O. Box 810 Acton, CA 93510 T: 661-468-7496 E-mail: atc@actontowncouncil.org</p>	<p>Southern California Edison Company (U338E) Attn: Anna Valdborg, Director & Managing Attorney 2244 Walnut Grove Avenue Rosemead, CA 91770 T-626-302-6008 E-mail 1: Anna.Valdborg@sce.com E-mail 1: case.admin@sce.com</p>

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A)
 The Acton Town Council
 P.O. Box 810
 Acton, CA 93510

(for Commission use only)

COMPLAINANT(S)

vs.

(B)
 Southern California Edison (U338-E)
 P.O. Box 800
 Rosemead CA 91770

DEFENDANT(S)

(Include Utility "U-Number", if known)

(C)
 Have you tried to resolve this matter informally with
 the Commission's Consumer Affairs staff?

YES NO

Did you appeal to the Consumer Affairs Manager?

YES NO

Has staff responded to your complaint?

YES NO

Do you have money on deposit with the
 Commission?

YES NO

Amount \$ _____

Is your service now disconnected?

YES NO

COMPLAINT

(D)
 The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
The Acton Town Council	P.O. Box 810, Acton CA 93510	(661) 468-7496

respectfully shows that:

(E)
 Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
Southern California Edison	P.O. Box 800, Rosemead CA 91770	

(F)

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

See attached Statement of Concerns, Sequence of Events, and Attachments.

(G) Scoping Memo Information (Rule 4.2(a))

(1) The proposed category for the Complaint is (check one):

adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)

ratesetting (check this box if your complaint challenges the reasonableness of a rates)

(2) Are hearings needed, (are there facts in dispute)? YES NO

(3) Regular Complaint Expedited Complaint

(4) The issues to be considered are (Example: The utility should refund the overbilled amount of \$78.00):

The Commission should find that Southern California Edison violated Section XIV B of General Order 131-D mandating that, prior to initiating projects, "public utilities shall consult with local agencies regarding land use matters". In practice, the Commission enforces this provision by requiring utilities to "comply with local regulations to the greatest degree feasible to minimize project conflicts with local conditions" [see page 3.9-47 of the TRTP Project Final Environmental Impact Report]. Accordingly, utilities like SCE must consult with local agencies regarding land use matters and either comply with local ordinances or obtain a variance in a manner consistent with Commission directives that "inherently require compliance with, or issuance of a variance for deviation from, all applicable local zoning ordinances" [see page 3.9-47 of the TRTP Project Final Environmental Impact Report]. SCE did not "consult with local agencies" before developing a helipad at 30230 Aliso Canyon Road on October 11, 2021 and initiating helicopter operations on October 12, 2021 nor did SCE comply with local zoning ordinances or secure variances prior to initiating these activities. SCE compounded this violation by refusing to acknowledge its obligation to coordinate with the County to address land use issues pursuant to GO-131 D because on October 15, 2021, SCE informed the ATC that County ordinances apply only to "private helicopter helipads and heliports" and not "a temporary landing area for public use". This is contrary to prior Commission directives issued pursuant to GO 131 D that utilities "comply with local regulations to the greatest degree feasible to minimize project conflicts with local conditions".

The Commission should find that SCE further violated Section XIV(B) of General Order 131-D when it failed to consider the land use conflicts presented by the placement of a helipad on residential property and the deployment of helicopters to and from a residential neighborhood.

The Commission should assess the manner in which Southern California Edison deploys helicopters in and over residential neighborhoods in Acton merely for convenience and not necessity, and the extent to which such operations endanger the lives of Acton residents. Based on this assessment, the Commission should conclude that Southern California Edison not only violated General Order 131-D by failing to consult the County before placing a helipad on a residential property and deploying helicopters to and from a residential neighborhood, but did so merely for convenience and thereby exposed lives and property in Acton to considerable risk.

(5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint. Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09):	December 15, 2021 (If prehearing conference is needed)
Hearing (Example: 7/1/09)	January 17, 2022 (If a hearing is necessary)

Explain here if you propose a schedule different from the above guidelines.

N/A

(H)

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

The Acton Town Council seeks the following remedies:

- 1) The Commission will direct SCE to cease helicopter operations (including, but not limited to, hotfueling, equipment and worker "slinging", hovering, and other activities) from Acton residential properties and in Acton residential neighborhoods. To ensure that SCE is aware of Acton's community boundaries, the official map of Acton prepared by the County of Los Angeles is provided in Attachment B.
- 2) The Commission will direct SCE to repair the road serving Beartrap Canyon in Acton.
- 3) The Commission will direct SCE to refrain from conducting helicopter operations (including, but not limited to, hotfueling, equipment and worker "slinging", hovering, and other activities) from Acton residential properties or to and from Acton residential neighborhoods until it first demonstrates to the Commission that it has fully exhausted all possible alternatives that avoid helicopter deployment in, on, or over residential neighborhoods. The alternatives that SCE shall consider include the use of ground equipment rather than helicopters. If ground equipment cannot be used, then SCE shall develop a Helicopter Plan that conclusively demonstrates why helicopter deployment is necessary. The Helicopter Plan shall restrict the placement of

helicopter landing areas to only vacant public lands in Acton that lie outside of residential neighborhoods; it shall also demonstrate how helicopters will avoid flying over residential neighborhoods to the greatest extent feasible. The Helicopter Plan shall incorporate review comments from the Acton Town Council.

4) The Commission will direct SCE to notify the Acton Town Council and affected residents (i.e., residents along the flightpath) prior to deploying low-flying (less than 500 feet) helicopters within the Community of Acton for maintenance, inspection, repair, or any other purpose; the notification shall describe the scope, extent, and schedule of the helicopter activities that will take place. SCE shall also provide the Acton Town Council with the final Helicopter Plan and demonstrate that the activities cannot be accomplished through some means other than the use of helicopters.

5) The Commission will confirm that public utility projects must "comply with local regulations to the greatest degree feasible to minimize project conflicts with local conditions" and "require compliance with, or issuance of a variance for deviation from, all applicable local zoning ordinances".

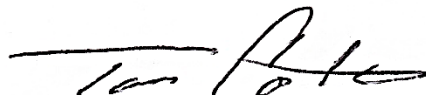
6) The Commission will direct SCE submit complete copies of permit and/or variance applications to the Acton Town Council and to affected residents before they are filed with the County of Los Angeles for activities within the Community of Acton. These submittals to the Acton Town Council shall set forth the scope, schedule, and extent of the activities that will be conducted pursuant to the application. Additionally, all variance applications must demonstrate that there is a substantial need to conduct the activities in the manner requested, that no alternatives are available to SCE to conduct the operations in a more compliant and less impactful manner, and that the variance request is driven by actual need and not mere convenience or efficiency.

(I)

OPTIONAL: I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are: atc@actontowncouncil.org

(J)

Dated Acton, California, this 15th day of November, 2021
(City) (date) (month) (year)



Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

(I)

REPRESENTATIVE'S INFORMATION:

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative:	Jacqueline Ayer
Address:	2010 West Avenue K, #701, Lancaster, CA 93536
Telephone Number:	949 278 8460
E-mail:	atc@actontowncouncil.org
Signature	/S/ Jacqueline Ayer

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(L)

Executed on _____, at _____, California
(date) (City)

(Complainant Signature)


VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(M)

Executed on November 15, 2021, at Acton, California
(date) (City)



Signature of Officer

Vice President

Title

(N) **NUMBER OF COPIES NEEDED FOR FILING:**

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one defendant, then you must submit a total of eight (8) copies (Rule 4.2(b)).

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

(O) Mail paper copies to: California Public Utilities Commission
Attn: Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACYNOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission (“CPUC”) intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a public record and may be posted on the CPUC’s website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.



Signature

November 15, 2021

Date

Tom Costan, Vice President

Print your name

STATEMENT OF CONCERNS

On October 11, 2021, heavy equipment began clearing and constructing what appeared to be a helipad on a residential property in the Beartrap Canyon neighborhood of Acton, CA; the next day, helicopters with cables slung beneath them were observed to hover over the ground at 30230 Aliso Canyon Road for a short period, and then travel east and south into the nearby San Gabriel Mountains National Monument. The Acton Town Council ("ATC") was informed by neighborhood residents that these helicopter operations continued throughout the morning and occurred frequently after that day. Residents in the neighborhood have further informed the ATC that they observed the helicopters carrying equipment, cables, and even people to and from 30230 Aliso Canyon Road. In addition, large trucks, heavy equipment, and fuel vehicles were observed traveling to and from this address. These vehicles accessed the address by exiting Aliso Canyon Road (a paved road maintained by the County) and traveling up a long and rough dirt road that is maintained and used by the neighborhood residents for access and egress. Neighborhood residents have informed the ATC that the truck traffic caused substantial deterioration of the (already primitive) road.

Upon interviewing residents, the ATC learned the helicopters were operated by Southern California Edison ("SCE") contractors. In a series of emails, the ATC diligently inquired regarding the scope of the project and the extent to which SCE coordinated with the County before initiating it. The County's response indicated that, as a public utility, SCE is exempt from land use considerations (i.e., zoning, permits); the County also stated that SCE's helipad and helicopter operations were approved by the California Public Utilities Commission. The ATC contacted the Commission via telephone, but could not confirm this. In communications with SCE, the ATC asked why SCE required such extensive helicopter operations, and why they were being conducted from a residence in a residential neighborhood; in particular, the ATC conveyed the following concerns to SCE:

- It was inappropriate for SCE helicopters to be flying on the morning of October 12 at a time when the Community of Acton was in a red flag (high wind) condition and portions of our community were under a Public Safety Power Shutoff ("PSPS") event warning.
- The Beartrap Canyon neighborhood is within the Aliso Canyon area of Acton and frequently experiences strong wind gusts and unpredictable wind patterns. This makes the residential neighborhood of Beartrap Canyon particularly unsuitable for the extensive helicopter hovering, fueling, and slinging operations that SCE initiated on October 12.
- SCE helicopter operations are known to be dangerous – A hovering helicopter operated by an SCE contractor in a rural area of Agua Dulce (the community adjacent to Acton) flipped in 2008, killed a person, and impacted a fuel truck (which fortunately did not ignite a conflagration). According to the NTSB report, winds were reported to be light and variable; the pilot estimated that the gust which caused the accident was only 15 knots (or 17.3 mph) - See attachment A. Also, the Commission grounded all helicopter activities on San Diego Gas & Electric's " Sunrise Transmission Project" for a time due to significant safety concerns [<https://www.sandiegouniontribune.com/news/watchdog/sdut-state-grounds-sunrise-powerlink-helicopters-2011sep27-htmlstory.html>]

The ATC was informed that fueling trucks were observed at the 30230 Aliso Canyon Road location and we suspect that "hotfueling" was taking place at this residence. ATC specifically asked SCE whether it was "hotfueling" its aircraft at the Beartrap Canyon residence; SCE did not and will not answer this question.

There are many vacant areas in Aliso Canyon that are located outside of residential neighborhoods and thus better suited for helipad purposes to support SCE helicopter operations. One site that is owned by the US Forest Service ("USFS") and located two miles east of the Beartrap Canyon neighborhood was previously used by SCE helicopter operations in the construction of the Tehachapi Renewables Transmission Project ("TRTP"); it would have provided a far superior helipad location because it would make for shorter helicopter trips and has fully paved access via Aliso Canyon Road. It would also have been much safer to use as a

helipad because it is not located anywhere near a residential neighborhood. There is no reason why SCE could not have applied to the USFS to use a small portion of that parcel and agreed to re-vegetate the disturbed areas after work was completed. Another location at Mill Creek summit located east of Beartrap Canyon would also have been a superior spot; SCE used it for TRTP helicopter operations in the past, and it is already graded, cleared, and has fully paved access from Angeles Forest Highway. It would be much safer for Acton residents if SCE used either of these locations. It would also have been more efficient because all the helicopter work that SCE did from Beartrap Canyon was toward the east, so these alternate locations would have resulted in reduced helicopter trip lengths.

SCE is not permitted to expose people to increased safety risks by conducting helicopter operations in a residential neighborhood without first exhausting possible alternative locations that are outside residential areas. Moreover, it is never acceptable for SCE to expose people to increased safety risk merely out of convenience or because SCE prefers one location to another. If it is feasible for SCE to conduct helicopter operations from vacant property that is not in or near a residential area, then SCE has an obligation to do so regardless of convenience.

Section XIV B of General Order 131-D ("GO-131 D") mandates that, prior to initiating projects, "public utilities shall consult with local agencies regarding land use matters". In practice, the Commission enforces this provision by requiring utilities to "comply with local regulations to the greatest degree feasible to minimize project conflicts with local conditions" (see page 3.9-47 of the TRTP Project Final Environmental Impact Report). Accordingly, utilities like SCE must either comply with local ordinances or obtain a variance in a manner consistent with Commission directives that "inherently require compliance with, or issuance of a variance for deviation from, all applicable local zoning ordinances" (see page 3.9-47 of the TRTP Project Final Environmental Impact Report). SCE did neither before developing a

helipad and initiating helicopter operations out of an Acton residential neighborhood in October of 2021. In fact, the communications from County to the ATC that are described above indicate that the County was wholly unaware of SCE's consultation obligations under GO 131-D; in other words, SCE apparently made no effort to consult or inform the County regarding the critical role it plays in addressing land use conflicts posed by SCE projects.

Had SCE consulted with the County as required by GO 131-D, Acton residents would have been apprised of SCE's helicopter activities ahead of time and the ATC would have had an opportunity to recommend more safe and convenient alternatives that would fully mitigate our safety concerns. Nonetheless, SCE persistently maintains that it had no compliance obligation: for instance, in a communication received by the ATC on October 15, 2021, SCE stated County ordinances apply only to "private helicopter helipads and heliports" and not "a temporary landing area for public use".

Another concern with SCE's helicopter operations is that, as a rural community, Acton is home to numerous and extensive animal facilities, including "big cat" (lion and tiger) and wolf rescues, animal sanctuaries, equine rescues, dog rescues, extensive equestrian training operations, and agricultural animal operations including sheep, llamas, rheas, and chickens. The deployment of helicopters in residential areas of Acton cause substantial disruptions and they endanger the lives of both animals and handlers.

The ATC is also concerned with the condition of the dirt road that the residents of Beartrap Canyon rely on for access and egress; we have been informed that the road (which was already in poor shape) was further deteriorated from the excessive use by SCE's contractors, their heavy equipment, and trucks.

SEQUENCE OF EVENTS LEADING UP TO THIS COMPLAINT

On Monday, October 11, 2021, members of the Acton Town Council were contacted by multiple Acton residents regarding earthmoving activities and large truck operations being conducted in the Beartrap Canyon area of Acton (the address is 30230 Aliso Canyon Road); the residents indicated that they believed a helipad was being constructed on a private residential property in an existing residential neighborhood located adjacent to the San Gabriel Mountains National Monument. The workers onsite informed the residents that the helipad was being constructed for use in a project by Southern California Edison (SCE).

On the evening of Monday, October 11, 2021, the ATC emailed Rochelle Silsbee of SCE to inquire whether SCE had constructed the helipad, and if so, to please provide copies of all documentation relevant to this project, including any authorizations issued by the CPUC.

Throughout the morning and early afternoon on Tuesday, October 12, 2021, several members of the Acton Town Council were contacted by multiple Acton residents that helicopter operations had begun at 30230 Aliso Canyon Road, that continual helicopter arrival, hovering and departures were observed, that numerous large trucks were traveling to and from the property and causing further damage to the existing dirt road that is already somewhat deteriorated.

Given that SCE had previously put the Community of Acton on notice of "red flag" conditions for October 12 and had also issued PSPS warnings to Acton residents, and out of safety concerns triggered by the deployment of helicopters under such conditions, the Acton Town Council contacted the Los Angeles County Regional Planning Department regarding the helipad project and the helicopter operations on October 12, 2021. County staff replied that 1) the helicopter activity was being conducted by SCE; 2) as a public utility, SCE operations are exempt from local zoning regulations; 3) SCE obtained approvals for the helipad from the California Public Utilities Commission; and 4) questions regarding SCE's helicopter operations should be addressed to SCE and/or the CPUC.

By late in the afternoon of Tuesday, October 12, 2021, SCE had still not responded to the ATC's inquiry of the previous day. The ATC emailed Ms. Silsbee and again requested confirmation whether the helicopter activity was SCE's.

Shortly before 6 PM on October 12, 2021, SCE emailed the ATC and stated "contractor crews are supporting emergent work related to a safety project in the area" and she committed to providing the requested information "as soon as possible". The email did not confirm whether helicopter operations were part of SCE's "emergent work".

At approximately 8:30 PM on October 12, 2021, the ATC responded to SCE's communication by pointing out that "The ATC is attempting in good faith to coordinate with SCE to address substantially inappropriate activities initiated by individuals who (we have been informed) are acting on SCE's behalf and we have sought to confirm whether this is the case. We are doing so because it is a reasonable "first step" to achieve resolution of the situation. The next step is a complaint to the CPUC; it is preferable that we not move on to the second step, but we will do so if SCE continues to prevaricate" The ATC then asked (again) whether "its contractors are using a helipad on private land in Aliso Canyon?" and expressed a keen interest in having this and other questions answered by the next day.

Late in the day on October 13, 2021, SCE provided the following response: "We understand the community's concerns about the disruption caused by our helicopter work and apologize for the inconvenience. As I previously mentioned, this work is necessary for the safety of our system. Our crews are replacing rods and anchors that secure guy wires – tension cables that add stability to our power poles. We are working with the county to ensure we maintain in compliance with local ordinances. Please know that we will take every measure we can to minimize the disruption to the community." SCE did not provide any of the documentation requested by the ATC. Additionally, SCE did not "maintain compliance with local ordinances" because the County had previously stated that SCE was exempt from such ordinances; therefore, the County played no role in SCE's project.

On October 14, 2021, the ATC emailed a response to SCE pointing out 1) SCE helicopters were again operating in a residential neighborhood; 2) SCE trucks and vehicles were causing deterioration of the dirt road that residents need for access and egress; 3) SCE helicopters pose very real and deadly safety risks particularly in areas like Aliso canyon where wind gusts are common; 4) SCE has still not explained why it based its helicopter operations in a residential neighborhood and not in other areas nearby that would have been much safer; 5) SCE is not permitted to endanger the lives of Acton residents out of convenience or without good reason, yet it has provided no reason whatsoever; 6) The ATC has not found any authorization issued by the CPUC for the helicopter work being done; and 7) Consistent with Commission directives, SCE projects must comply with local zoning ordinances or obtain a variance from them.

On Friday evening, October 15, 2021, SCE sent an email briefly describing the project being conducted. The email did not address the safety concerns raised by the ATC, it did not explain why the helicopter operations had to be based on a residential property within a residential neighborhood of Acton, and it did not explain why SCE did not use nearby vacant lands that have direct access to paved county roads. What SCE's communication did explain is that SCE intends to

continue operating helicopters from the Beartrap Canyon neighborhood until at least October 29, 2021 and that the Los Angeles County Code does not apply.

On Thursday, October 21, 2021, the ATC sent an email to SCE and County staff informing them of the ATC's intent to file a complaint and inviting them to discuss the matter with the ATC if they wished.

On Monday October 25, SCE Staff contacted ATC President Owen and explained that safety is very important to SCE, and that the location in the Beartrap Canyon neighborhood where SCE is flying out of was selected because the pilot said the location was safe and efficient. SCE also pointed out that SCE only graded a large pad and is using it as a temporary helicopter landing zone and not a helipad.; since it is only a temporary helicopter landing zone and not a helipad, it does not require a county permit.

On October 27, 2021, the ATC filed a complaint with the Commission.

On November 10, 2021, the Commission sent a letter to the ATC via electronic mail stating that the complaint was rejected and explaining why.

On November 15, 2021, the ATC cured the defect that was identified in the Commission letter dated November 10, 2021, and subsequently re-filed the complaint on November 16, 2021

ATTACHMENT A

Excerpt from the National Transportation Safety Board Aviation Accident Final Report for the SCE Helicopter Crash in 2008

The full report is found here:

<https://data.nts.gov/carol-reppen/api/Aviation/ReportMain/GenerateNewestReport/69584/pdf>



National Transportation Safety Board Aviation Accident Final Report

Location: Santa Clarita, California **Accident Number:** WPR09LA057
Date & Time: December 17, 2008, 09:30 Local **Registration:** N267KA
Aircraft: Kaman K-1200 **Aircraft Damage:** Substantial
Defining Event: Loss of control on ground **Injuries:** 1 Fatal, 1 None
Flight Conducted
Under: Part 91: General aviation – Positioning

Analysis

With the engine started and at flight idle, the ground crewman/mechanic disconnected the ground power cart from the helicopter's external power unit plug. As the ground crewman/mechanic was walking away from the helicopter, the pilot detected that a gust of wind was lifting the aircraft up off of its right main landing gear. The pilot applied full right cyclic to counter the uplifting condition; however, the wind gust continued lifting the helicopter to the left and nose down until the aircraft came to rest inverted. As the helicopter was rolling over, the main rotor blades impacted a fueling truck and struck the ground crewman/mechanic. There was no postcrash fire. The pilot noted that the winds were generally light and variable at the time of engine start, and estimated that the gust was from the east-southeast at up to 15 knots. He further reported that gusty, unpredictable wind conditions were not uncommon in the area. The closest aviation weather reporting station was 22 miles south east of the accident site and was reporting winds from 030 degrees at 7 knots. According to the Kaman K-1200 flight manual, the maximum right quartering tailwind condition for takeoff and landing is from 17 knots to 25 knots. The winds at the accident site most likely exceeded the maximum wind allowed with reference to the helicopter's prevailing wind envelope, which resulted in the helicopter lifting to the left and rolling over.

Probable Cause and Findings

The National Transportation Safety Board determines the probable cause(s) of this accident to be: The helicopter's encounter with a gusty crosswind condition during engine start that exceeded the helicopter's demonstrated wind envelope.

Findings

Aircraft Maximum crosswind component - Capability exceeded
Environmental issues Gusts - Effect on operation

ATTACHMENT B:

Acton Community Boundary Map

