USPA is currently addressing an important issue with the Federal Aviation Administration that could have critical impacts on many drop zones across the country, and we need your help.

The July 3 issue of the Federal Register contains a new proposal by the FAA to establish standards for on-airport parachute landing areas (PLAs). A 45-day comment period is provided, after which the FAA will finalize its proposal.

The FAA is proposing that the PLA standard be adopted as a new appendix to FAA Advisory Circular 150/5300-13, which sets standards for airport facilities. Any airport that has received federal funds or that intends to apply for federal funds and that also accommodates skydiving must ensure that the PLA complies with the new standard. Moreover, the FAA must review and approve the PLA to ensure compliance, and the PLA must be reflected on the airport layout plan (an FAA-required engineering drawing of all existing and proposed facilities on the airport). The standard would apply to all existing and future DZs on federally funded airports, though other airports are likely to voluntarily adopt the standard.

USPA Urges Comments

USPA urges members to thoroughly review the FAA proposal along with USPA’s concerns and submit comments to the FAA before the August 17 deadline.

Because the proposal directly affects existing DZs, USPA has asked all DZOIs to review the proposal, assess the impact on their operations and inform USPA of their findings so that USPA can help coordinate DZ comments to the proposal.

The FAA Proposal

The FAA is proposing that all parachute landing areas (PLAs) on federally funded airports meet a newly developed FAA standard that dictates the size and location of the landing area on an airport. Here is the Federal Register notice, and here is the draft appendix. Following is a summation of the proposal’s landing area requirements:

- Hazards—The FAA has adopted all landing hazards defined in the USPA Basic Safety Requirements (BSRs) and has also added runways, taxiways and on-airport navaid equipment (except lights). (The FAA will consider removing runways and taxiways as hazards as part of a risk mitigation plan; more on this later.)

- Size—Minimum landing areas are specified in square feet for students, tandems and all other skydivers, as well as for ram-air and round parachutes. See Table A18-1 in the notice. Importantly, the FAA is proposing flexible shaping of those minimum sizes, not just circles, so that a PLA can sometimes fit within rectangular grass areas between runways and taxiways, for instance, as long as required buffers (see “Location” below) are met. This is actually quite helpful. The specified square footage for ram-air canopies is roughly equal to the circular square footage obtained by the use of radial distances to
the nearest hazard in the BSRs. (The PLA sizes for round parachutes were derived from old USPA radial distances from the past.)

- **Location**—The edge of any PLA must be a minimum of 30 feet from any airport navaid, and the center of the PLA must be sited beyond a 45-degree plane from the top of any hazard (hangar building, etc.). The edge of any PLA must be a minimum distance from any runway and taxiway; that distance is determined by the largest airplane using that runway or taxiway. See Table A18-2, which relates minimum buffer distances to Airplane Design Groups (ADG). The buffer distance will either be 20, 31 or 48 feet for most runways and taxiways. (For comparison, most single-engine aircraft are in ADG I; the King Air, Twin Otter, Skyvan and CASA 212 are in ADG II; the DC-3 is in ADG III.) Except at air-carrier airports, PLAs may overlap Runway Safety Areas, Taxiway Safety Areas and Object Free Areas if no other areas are feasible, as long as the buffer distances are met.

- **Recommended Markings**—PLAs are to be outlined by chalk, cones, mowing, etc.

- **Application**—New DZs at all federally funded airports must have landing areas that meet the standards. Landing areas of existing DZs must comply within five years, unless mitigated or granted an extension.

**Risk Mitigation**

Understanding the potential cost burden to DZs and airports, the FAA has agreed to consider “risk mitigations” that will allow non-compliant landing areas in cases where the new standard creates a less-tolerable landing area or introduces new safety or cost concerns. Mitigation factors such as taxiway information signs could be applied at specific airports where a non-FAA-compliant PLA is deemed to be the best landing location for skydivers. However, the degree to which the FAA will allow reasonable mitigations (and just what those mitigations would be) is unknown at this point.

**USPA Concerns**

This proposal is part of an overall effort by the FAA to assist skydiving operators with airport access. While USPA fully supports that goal, this proposed PLA standard causes several concerns; members may wish to elaborate on these concerns in their comments.

The proposal lacks justification. The FAA has told USPA that action is needed to separate skydivers from aircraft moving on taxiways and runways. Initially, in December 2010, the FAA commissioned a study of existing DZ operations on public airports, but the resulting report contained no accident or incident data with respect to the hazards of parachutes landing on airports. In fact, on several occasions the FAA asserted that it did not need accident/incident data. Strangely, in March 2012, a full year after initiating the effort and four months after finalizing its approach, the agency hurriedly generated 27 reports involving skydivers and airports. Those 27 reports are posted on the FAA website, with a link to the site in the Federal Register proposal. These reports are now cited as justification. USPA contends the 27 reports offer little to no justification—many have nothing to do with landing areas—and that the overall safety record of
Skydivers coexisting with aircraft on airports is excellent. Skydiving has been conducted on airports of all types for over five decades, with an estimated 56 million cumulative jumps made. Throughout, there have been only a handful of skydiver collisions with parked aircraft and with aircraft in-flight. USPA cannot document a single collision between a skydiver and an aircraft moving on an airport surface.

The FAA states that a PLA standard will enable airport access. The FAA contends that airport managers can currently refuse to accommodate a proposed DZ by asserting that their airport has no space for a parachute landing area. The FAA claims that a PLA standard defuses that basis for a denial. While this may be true in a few specific cases, the cost and/or burden to other DZs and airports appears not to be worth the gain.

Existing DZs may have to relocate their landing areas. For decades, DZs and airports have adopted USPA's circular landing areas, applying the relevant BSR radial distance to the nearest hazard. Many of these USPA-compliant landing areas overlap a taxiway, and in some cases they overlap a runway, because neither is currently defined as a hazard. The proposed FAA standard defines runways and taxiways as hazards and requires the new PLAs to be offset specific distances from runways and taxiways. This could force some DZs to move their landing areas to different locations farther from the DZ hangars; in some cases, the new PLA may only fit on a remote portion of the airport. New PLAs that are distant from the DZ facility may introduce new risks, such as skydivers walking across runways or taxiways. Some airports may require the DZ to purchase and provide shuttle vehicles. In extreme cases, a DZ might have to move from a constrained airport with no space for an FAA-compliant PLA.

The FAA is creating new bureaucracy. The proposed requirement for FAA approval of PLAs and the revision of airport layout plans introduces a new bureaucratic approval process that will add cost and delay for those proposing new DZs. For decades, Federal Aviation Regulation Part 105 has simply required airport management approval for skydiving to occur at a non-towered airport. Now the FAA wants to usurp the airport manager's authority and review every existing and proposed PLA for official FAA approval. Where airport managers can currently grant same-day approval for skydiving, the new FAA approval process can add months to the process. However, the FAA contends that no rulemaking change is necessary to enact the new requirement. Approved PLAs will also have to be depicted on the airport layout plan, creating more delay.

How to Comment

Members are encouraged to submit comments to the FAA, as described in the Federal Register notice. Don’t just say you dislike the proposal or that the FAA should withdraw the proposal, but provide substantive reasons for your view. The July 16 issue of the “USPA Update” e-newsletter will contain an analysis of the FAA proposal, along with specific talking points that may be helpful in preparing comments to submit to the FAA. Be sure to save your comments and provide a copy to USPA at govrelations@uspa.org.