Pilot Training Modernization Comments

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There are good reasons to reevaluate pilot training in the U.S., especially because flight training schools are well known for their adverse impacts on local communities.

Background: Hazards of General Aviation

Aviation accidents occur on a near daily basis in the U.S. According to the National Transportation and Safety Board, NTSB Dashboard, nationwide there were a total of 16,423 accidents between 1/01/2014 and 2/25/2025, an average of more than 1500 each year which translates into 4 accidents every day. Many result in deaths and serious injuries to pilots, passengers and people on the ground. Most occur in small general aviation aircraft flown by hobbyists, students and private pilots.

On 1/29/2025 a midair collision occurred when a passenger jet on approach to the Ronald Reagan International Airport collided with a military Black Hawk helicopter engaged in a nighttime training mission. There were no survivors. All 64 occupants aboard the passenger jet and the 3 army helicopter crew members perished when their respective aircraft fell into the Potomac River. This tragic accident highlights the dangers posed by flight training activity conducted by both the military and civil aviation due to human error and unforeseen circumstances.

Another factor contributing to airspace congestion was addressed in an 11/10/2024 Business Insider article. "The number of miles flown by private jets soared 53% between 2019 and 2023, while the number of private aircraft rose by 28%, according to a major new study published in Nature."

A <u>2/20/2025 CNN article</u> on a midair collision involving an 2/19/2025 instructional flight at an Arizona flight training airport included the following statement: "The National Air and Space Museum estimates there are more than 340,000 general aviation aircraft around the world and US pilots operate 204,000 of them." To put this in perspective, though the U.S. accounts for only 1.87 percent of earth's land mass, U.S. pilots operate 60% all general aviation aircraft. The remaining 136,000 are apparently scattered over the remaining 98.17 percent of the land mass across the globe. Is it any wonder, given this extremely high concentration of aircraft, that nationwide, general aviation aircraft are falling out of the skies on a near daily basis, all too often, crashing into homes, residential communities, shopping malls, businesses, golf courses, major highways, roads, parks, and other public areas?

A major reason for congestion in the skies over this country is the FAA's multi-year history of marketing the U.S. as a hub for training pilots from across the globe. Not only does this add to the congestion and safety risks, it also contributes to the relentless aviation generated noise and pollution. Sadly, impacted communities are historically denied a voice in the decision making process due to the FAA's unilateral, top-down

approach. As a result, local residents are being subjected to a severe degradation in multiple domains including the environment, public health, livability, and quality of life.

Impacts of General Aviation Example: Oregon's Hillsboro Airport (HIO)

For the purposes of commenting on the FAA pilot training modernization discussion, I'll use the Hillsboro Airport (HIO) in Oregon as an example, as I am directly impacted by flight training operations at this facility, even though I live 12 miles away in an otherwise low-ambient noise area. For all intents and purposes, the users of HIO and surrounding airports have hi-jacked my right to the enjoyment of my property.

With more than 600,000 residents, Washington County, where HIO is located, is the second most populated county in Oregon. Many of the people who live in this jurisdiction, especially Western Washington County, are subject to frequent repetitive, toxic, noisy, low altitude training flights. The 2017 Environmental Protection Agency (EPA) National Emissions Inventory (NEI) ranked HIO as the 8th most lead polluted airport in the country out of 20,000 airports nationwide. It is also the largest facility source of lead in Oregon, while Washington County is the most lead polluted jurisdiction in the entire state.

The residents of Washington County, neighboring Yamhill County, and surrounding jurisdictions are often subjected to hundreds of aircraft circling and looping over homes and neighborhoods every single day. A significant number of these aircraft fly at dangerously low altitudes while practicing stalls and other training maneuvers.

Hillsboro Aero Academy (HAA), an HIO tenant, is an international flight training school. It operates out of three Oregon airports - Hillsboro and Troutdale, which are owned and operated by the Port of Portland, and the Redmond Airport, owned by the City of Redmond. The unelected members of the Port of Portland (Port) Board of Commissioners are appointed by the governor, thus disconnected, and for the most part indifferent, to the impact of these airports on local residents. The Port, one of the biggest polluters in the the state, has a long history of poisoning the environment and exploiting local communities in the interest of turning a profit. It is noteworthy, given the oppressive nature of this political structure, that there is no public forum for impacted community members to provide input about the impacts of flight activity at HIO.

The majority of pilots who train at the academy are from outside the country. The following excerpts are from the <u>HAA website</u>:

"For the last four decades, thousands of pilots from more than 75 countries have started their career training with HAA. Global airlines and operators like Alaska Airlines, Horizon Air, Japan Airlines, Korean Air, ADAC, and Bristow have turned to us to train their pilots."

"HAA is one of only a handful of US-based flight schools authorized by the Civil Aviation Administration of China (CAAC) to train future Chinese airline pilots; regular review and renewal of our CAAC certification ensures that we continue to

meet the strict training and safety standards required by Chinese authorities. Our CAAC certification applies to both our airplane and helicopter career pilot programs. Because of our certification and long track record with Chinese flight students, we have secured career partnerships with a number of Chinese airlines, including China Air, Sichuan Airlines, Shandong Airlines, and Juneyao Air."

"We welcome many individual Korean students in addition to those who come to us through our partnership with Korea Aerospace University, which supports Korean Air's commercial pilot hiring needs. We're pleased to welcome groups of KAU cadets to our Redmond Campus for ab initio training multiple times per year. To learn more about the experience of our Korean students, read this interview with <u>cadet Youngmin-Yoon</u> on our blog."

"Japanese commercial pilot cadets are an integral part of our flight community at our Hillsboro Campus. In addition to our career partnership with Japan Airlines, many Japanese students enroll with us individually, drawn by our longstanding reputation in the country."

"In 2020, <u>Hillsboro Aero Academy</u> successfully completed a long and rigorous process to achieve certification from the Civil Aviation Authority of Vietnam (CAAV) to conduct professional airplane pilot training in accordance with CAAV regulations. That approval ensures that Vietnamese cadets who complete their training with us will be qualified to fly for Vietnamese airlines."

"Our airplane school and our helicopter school, Hillsboro Heli Academy, are the only <u>US-based flight training schools</u> with joint EASA/FAA training on the F-1 visa. European students save considerable time and expense with joint training vs. separate FAA and EASA training, and they earn the ability to fly commercially all over the world."

"We are one of only eight flight schools in the US with an F-1 visa program, and the only one with an EASA-approved curriculum. Most schools offer only the 12-month M-1 visa, which does not allow for enough flight hours for students to fly commercially in their home countries. The F-1 visa allows up to 23 months of additional time in the US, with the ability to gain employment as a pilot (usually as a Certified Flight Instructor) and earn the hours needed to fly for European employers. In addition to the time savings that European students can enjoy from joint EASA/FAA training our hourly rate for flight instruction is typically about 50% lower than comparable European-based flight training, without compromising our FAA Part 141 and EASA certified standards of instruction and safety."

Over the course of doing business, aircraft registered to HAA have been involved in a number of accidents, more than 10 since 2016. One tragedy, which has spurred a recent lawsuit, occurred on October 23, 2023, when a 22 year old flight instructor and a 20 year old student pilot perished while engaged in practice exercises over a residential

community. A third aircraft occupant was seriously injured when the twin-engine Piper Seminole came crashing down into a house.

There were also 16 flight training accidents involving Hillsboro Aviation, the predecessor to Hillsboro Aero Academy, over a 15 year period between 1998 and 2013. On 9/20/2009 a flight instructor and student pilot perished when a Robinson training helicopter crashed then burst into flames upon impact. The NTSB Final Report identified "the flight crew's failure to maintain adequate main rotor speed while maneuvering, which resulted in a main rotor blade stall and an uncontrolled descent into terrain."

Just over two years later, on 10/25/2011, a private pilot died during a midair collision when a twin-engine Piper Seminole registered to Hillsboro Aviation collided with a Beech V35. The occupant of the Beech perished while the flight instructor and student pilot survived. According to the NTSB final report, the student had accrued a total of 55 flight hours.

This count doesn't begin to include the long list of multiple accidents linked to other airports within a 22 mile radius of HIO including but not limited to Portland International, Scappoose, Peirson Field, McMinnville, Aurora, Twin Oaks, and North Plains Gliderport.

Recommendations

Clearly there is an abundance of data demonstrating that flight training is noisy, toxic and dangerous. Below is a list of solutions for addressing the damages perpetrated by the flight training industry.

- Stop marketing the U.S. as a hub for international flight training. Develop a Peace Corps model by which students seeking pilot instruction are trained in their respective countries. Flight schools that want to provide the instruction can make it available in the countries seeking the training. In this way, the costs, noise, pollution, safety and security risks will be distributed more equitably around the globe rather than concentrated over disempowered local U.S. communities.
- Stop awarding government grants to flight training airports. Federal funding comes
 with strings attached in the form of grant assurances which deny airport-impacted
 communities a voice in addressing the adverse noise, pollution, environmental
 damage, property devaluation, safety and security risks caused by airports for at least
 20 years after accepting FAA Airport Improvement Program (AIP) money.
- Flight training airports should be self sustaining, rather than chronically reliant on government handouts. This can be achieved in part by establishing landing and user fees on all aircraft, including general aviation training and recreational aircraft weighing less than 10,000 pounds. This would help to insure that those who use these airports pay for the privilege, rather than foisting the costs onto the public.
- Require all flight training airports to fund community forums that meet on a regular basis. In addition, require flight training airports to monitor for lead, noise, benzene and other toxins released by aviation activity and to make this information transparent and readily available to local residents.