



July 1, 2023

SUBMITTED ELECTRONICALLY

SUBJECT: COMMENT ON AIRPORT ISSUES FOR CITY COUNCIL AGENDA JULY 25, 2023

Honorable Mayor and Members of the City Council,

The **Coalition for Torrance Airport Reform (COTAR)** is an outgrowth of the roughly 1,000 residents who signed a petition demanding Council action on the safety, noise, and lead pollution issues created by Torrance Airport. Because the City has not yet addressed these issues, COTAR has organized to take action and restore the balance between the community and its publicly-owned airport. COTAR will continue to organize and campaign until residents can once again enjoy a high quality of life.

COTAR is providing its comments on the Transportation Committee's recommendations that the Council will consider at the July 25, 2023 meeting. *These comments represent a general consensus among residents on solutions that are necessary to restore balance between the community and its airport.*

1. Landing fees for all transient aircraft and Torrance based flight schools/fleets of more than 3 aircraft, with certain exemptions for military, public safety, and medical flights

Our Position: We support the Transportation Committee's recommendation on landing fees; however, we urge the Council to apply the fees uniformly to all airport users (transient and based), except military, public safety, and medical flights.

Landing fees are a better way of allocating costs among all users of the airport. Airport operations have increased by more than 60% over the last two years, largely due to flight school activity. Airport revenues come almost entirely from hangar rentals and have not kept pace with the increase in operations. Transient aircraft have been using the airport free of charge. Therefore, fees are needed to ensure the long-term financial sustainability of airport operations. If fees result in a reduction of transient touch-and-go operations at the airport, residents would consider that an additional benefit.

2. Draft Letter of Agreement (LOA) between Torrance based flight schools and City of Torrance

Our Position: We do not support the LOA as written. Any LOA should at a minimum address north and south pattern training and include monitoring provisions. For example:

- Flight schools should follow *all* the City's noise abatement rules, recommendations, and suggestions, and the agreement should include a copy of the Torrance Airport Noise Abatement Guide.
- In the north pattern, flight schools should remain over commercial areas and avoid residential areas west of Hawthorne Blvd and north of 235th Street.
- Each flight school should not have more than two aircraft in the north training pattern at the same time.
- City should monitor flight patterns and prepare monthly reports on each school's compliance. The City should not renew business licenses of non-compliant flight schools.

3. Noise study to potentially expand the current number of noise monitoring stations in both the South and North patterns

Our Position: We support the Transportation Committee's recommendation, and urge the City to immediately add more monitors.

The west side of the airport is where most departures occur, and where aircraft are most likely to exceed the noise limit. Yet, only one monitor is there and aircraft frequently go around it. Additional monitors to the west would result in the detection of many more noise violations. In addition, the Hillside HOA area (at up to 300 feet above sea level), and Paseo De Las Tortugas (at 350 feet above sea level) both have high ground under the south pattern. All these areas should be included in the study.

4. Total phasing out of leaded gas in 10-15 years

Our Position: We support banning the sale of leaded gas as soon as possible (no later than June 30, 2024)—not in 10-15 years.

A 10-15 year timeframe for phasing out leaded fuel is much too long. Residents want leaded fuel banned as soon as unleaded fuel can be made available at the airport. The Council should direct staff to take whatever steps are necessary to bring unleaded fuel to the airport as soon as possible with a goal of bringing unleaded fuel to Torrance no later than June 30, 2024.

The new, unleaded fuel approved by the FAA in September 2022 (G100UL) is drop-in ready for all piston aircraft engines. Once it is available, there is no need to continue selling leaded fuel. The fuel producer has stated they will fulfill requests from airports in the order that they are received. Therefore, the Council should direct staff to immediately request the fuel to be delivered to the airport as soon as possible and take whatever steps are necessary to expedite the process. As soon as the fuel is available in sufficient quantities to service the airport, the sale of leaded fuel should be banned.

5. Eliminating touch and goes from both the South and North runways

Our Position: We support eliminating touch-and-go training in both the south and north patterns.

Touch-and-go's are a major source of the noise problem. Most aircraft conducting touch-and-go operations in the north pattern have not been complying with the City's recommended procedure to avoid residential areas and remain over

commercial/industrial areas. Touch-and-go operations in the south pattern violate the City's long-standing "early left turn" law.

It is not safe or sane to conduct low-level flight training over densely populated areas. Frequent training over residential areas increases the likelihood that when an accident happens, it will happen on top of homes and schools. Furthermore, touch-and-go operations in the south pattern cross over the airport's busiest helicopter routes and increase the risk of mid-air collisions. There have already been two fatal crashes during touch-and-go's since 2019. There will be others. Residents do not want the next crash to happen over a residential area.

6. Moratorium on the allowance of additional flight schools at Torrance

Our Position: We support a moratorium on new flight schools.

The Airport Master Plan and Council Resolution 77-215 limited Torrance to 6 flight schools—the number of schools operating at the time the plan was adopted. Now there are 10 flight schools, according to the Airport Manager. For reasons unknown, the City failed to follow through on its Master Plan and Resolution, to the detriment of residents today.

The Master Plan identified flight training as a major cause of airport noise. It was never envisioned that Torrance should become a large-scale, commercial pilot training center. The City should not have allowed leases and licenses to flight training schools without first considering their potential environmental impacts and updating the Master Plan. The City has proprietary rights over the use of airport land, and the Municipal Code allows the City to revoke business licenses for companies that are a public nuisance.

The above items on the agenda represent positive steps towards addressing airport issues. However, these items alone are insufficient to address the myriad problems that have become apparent in regards to airport noise, lead, and overall airport management and decision-making. **COTAR is petitioning City Council to take additional actions that are needed to restore balance between the community and its airport.** These actions are described in the attachment to this letter.

For COTAR,



Charles Costello
Torrance Riviera



Richard Root
Torrance Riviera



Daniel Will
Torrance Walteria

Attachment: COTAR PETITION FOR ADDITIONAL ACTIONS

cc: Aram Chaparyan, City Manager
Danny Santana, Assistant City Manager
Patrick Sullivan, City Attorney
Rebecca Poirier, City Clerk
Michelle Ramirez, Community Development Director
Shant Megerdichian, General Services Director

COTAR RECOMMENDATIONS TO CITY COUNCIL: ADDITIONAL ACTION ITEMS NEEDED

The Coalition for Torrance Airport Reform (COTAR) is recommending City Council to take the following 8 actions in order to (1) immediately address airport noise; (2) improve airport management; and (3) address the airport's long-term future.

ACTIONS TO IMMEDIATELY ADDRESS NOISE

1. ENFORCE EARLY LEFT TURN LAW

Action: Direct the City Manager to resume enforcing the City's Municipal Code for *all flights* taking off to the west and making early left turns before reaching the ocean.

The law is mandatory, not discretionary. It was adopted in the 1950s to protect residents on the south side of the airport where the ground is higher and the area is noise sensitive. The Code makes no distinction between left turns for training and left turns on departures. The City has obtained a written opinion by its outside counsel that its law is "grandfathered" from ANCA and enforceable. The City should defend its law in court, if necessary, and pay any legal expenses from the Airport Fund.

2. ESTABLISH MONETARY FINES FOR VIOLATIONS

Action: Direct staff to draft an ordinance for Council adoption establishing a system of progressive monetary fines for violations of airport laws.

Monetary fines are a more effective means of gaining pilot compliance with existing airport laws. The current enforcement process is slow, cumbersome, labor intensive, and ineffective. Violators are sent warning letters followed by Hearing Boards. Santa Monica Airport uses a system of progressive monetary fines, which has been very effective—its violation rate is much lower than Torrance's.

ACTIONS TO IMPROVE AIRPORT MANAGEMENT

3. PUBLISH MONTHLY NOISE ABATEMENT REPORTS

Action: Direct staff to prepare monthly noise abatement activity reports, to provide all relevant information and ensure transparency.

Historically, staff has prepared Noise Abatement Reports, but they were done quarterly and contained limited useful information. Currently, no reports are being done. Reports should be done monthly and include relevant information such as a list of the violations by type, number of prior violations, and actions taken (Notices of Violation, Hearing Boards, Fly Friendly letters, etc.). Santa Monica Airport has monthly reports available on their website.

4. UPDATE THE AIRPORT MASTER PLAN

Action: Direct staff to update the Airport Master Plan on regular basis, for as long as it has an airport.

The Airport Master Plan is from 1981 and was intended to guide airport decision-making for only a 20-year period. It has not been updated since then. A current Master Plan is needed to ensure the orderly development, operation, and management of the airport. Master Plan development also includes a

public input process, which is critical to ensuring that the community is consulted by the City on how the airport will be developed and used. It also includes the necessary environmental review process to mitigate local impacts.

5. CONDUCT PERIODIC NOISE CONTOUR STUDIES

Action: Direct staff to update noise contours at regular intervals.

Comprehensive noise contour studies need to be done at regular intervals to assess changes in community noise levels over time. Santa Monica Airport does this annually.

6. REASSIGN AIRPORT NOISE TO THE ENVIRONMENTAL QUALITY COMMISSION

Action: Reassign responsibility for advising the Council on airport noise from the Airport Commission to the Environmental Quality Commission.

Historically, the Airport Commission has been focused on pilot concerns, not noise abatement. The Environmental Quality Commission oversees the City's general community noise control and most of activities of the Community Development Department. Therefore, it is the more appropriate venue for airport noise.

ACTIONS TO ADDRESS AIRPORT'S FUTURE

7. CONSIDER CLOSING ONE RUNWAY

Action: Direct staff to identify the steps the City would need to take to close a runway, and report back to Council for consideration.

Residents want the number of flight operations reduced. Closing a runway would reduce repetitive touch-and-go operations, because training flights would have to share the runway with departures, creating a buffer in between training operations. The City should assess which runway to close and identify the steps needed to do so.

8. INITIATE AIRPORT ECONOMIC STUDY

Action: Direct staff to issue an RFP to study of the airport's economic benefits as compared to the potential economic benefits of converting the land to alternative uses.

The City Government has a fiduciary responsibility to Torrance taxpayers to ensure that public assets are employed to their highest and best use. The City has not calculated the airport's economic benefits. There is also tremendous potential economic value of the airport land for alternative uses, which the City should consider in order to understand the opportunity costs of continuing to the use the land as an airport. An independent, professional land use study is necessary to make rational and informed future decisions about the airport. This study can be paid for from the airport fund/landing fees.