

September 12, 2017

By Electronic Mail

Mr. Ron Reeves
Long Beach Airport
4100 E. Donald Douglas Drive, Second Floor
Long Beach, CA 90808
ron.reeves@longbeach.gov

Dear Mr. Reeves:

The National Business Aviation Association (NBAA) represents the interests of over 11,000 member companies that rely on general aviation (GA) aircraft to help make their businesses more efficient, productive and successful. Those members include numerous tenants and users of the Long Beach Airport (LGB) who continue to be strongly interested in the airport's future accessibility and viability, while operating as a good neighbor to the communities surrounding the airport.

Thank you for inviting NBAA to provide comments regarding proposed amendments to the Long Beach Airport Noise Compatibility Ordinance and Allocation Resolution. Air carriers and general aviation users play equally important roles in a symbiotic ecosystem at Long Beach Airport, and negative impacts to one type of user can have direct and indirect adverse effects on the other. Although NBAA understands that the curfew, penalty, and other changes proposed at this time are primarily targeted at commercial air carriers, the principles at stake are of concern to all aviation users.

NBAA is concerned that these proposals are inconsistent with the Airport Noise and Capacity Act of 1990 (ANCA) as well as with the assurances that the City has accepted as a condition of federal airport grants. ANCA was intended to prevent new local restrictions on aircraft operations, with a very limited grandfather clause. It appears that the proposed changes are significant, outside the scope of the grandfather clause, and would require a thorough study and affirmative FAA approval under 14 C.F.R. Part 161. Moreover, the City's grant-based obligations are independent of ANCA and require separate consideration, as acknowledged in the August 9th memorandum from Mr. Romo. The proposed changes appear to be at odds with those commitments, including the City's obligation to allow all types of aeronautical users access to LGB on reasonable terms and without unjust economic discrimination.

Finally, we acknowledge that LGB has recognized that before making changes, these proposals need to be fully vetted by senior FAA officials, we urge that the Airport work with the agency and include LGB tenants, users, and other interested parties in that process to establish a transparent approach, enabling the stakeholders to express their concerns to the FAA alongside any arguments made by the City.

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We applaud the City's leadership for recognizing the myriad of benefits that aviation offers to the City of Long Beach, the surrounding area and the region. We look forward to continuing to jointly work with the City, Airport staff, scheduled air carriers, GA users and the greater community to ensure that all LGB users can continue to benefit from the policies in place.

Thank you for considering our input and please do not hesitate to contact me if NBAA can be of additional assistance.

Sincerely,

A handwritten signature in black ink that reads "Alex Gertsen". The signature is written in a cursive, slightly slanted style.

Alex Gertsen, C.M.
Director, Airports and Ground Infrastructure

CC:

Jess Romo, Director, Long Beach Airport, jess.romo@longbeach.gov
Patrick West, City Manager, citymanager@longbeach.gov