


Date: December 20, 2024

To: Thomas B. Modica, City Manager 

From: Cynthia Guidry, Director, Long Beach Airport 

For: Mayor and Members of the City Council

Subject: **Second Update to General Aviation Operations at Long Beach Airport**

On September 12, 2023, the City Council requested a comprehensive report on general aviation operations (GA Report) at Long Beach Airport (Airport or LGB) in response to community concerns over increased General Aviation (GA) activity. The [GA Report](#) was released on October 31, 2023, and included seven specific recommendations within the authority of the Airport to improve the quality of life in nearby communities. On December 12, 2023, the GA Report was presented to the City Council. The Airport provided an update regarding GA operations in a [memorandum](#) dated March 15, 2024 (March Memorandum). This memorandum provides an update on GA operations since then. The Airport continues to collaborate with its regulatory and local partners to make progress on the seven recommendations outlined in the GA Report.

Recommendation 1: Pursue Voluntary Agreements with LGB Flight Schools

The Airport has finalized development of a formal Fly Friendly Program (FFP) that will analyze key performance metrics for each flight school and provide quarterly and annual recognitions for pilots who “fly friendly”. Over the last several months, the Airport met with various flight schools to discuss potential metrics and is excited to announce the launch of the FFP in January 2025.

The Airport’s FFP encourages best practices and acknowledges flight school participation. Key performance metrics will measure evening and nighttime departures, average noise levels, and altitudes (Attachment) and are designed to recognize those flight schools that consistently meet voluntarily goals. The Airport acknowledges the coordination and commitment by the Long Beach Airport Association (LBAA) and pilots that are following current noise abatement procedures ([Noise Abatement For Pilots](#)). The new FFP expands upon voluntary measures, keeps safety as a priority and recognizes the efforts of LGB-based flight schools.

Additionally, the Airport continues to meet individually with its GA tenants to discuss community concerns regarding their operations. As shared in the GA Report and March Memorandum, while the majority of flight school operations are in compliance with federal regulations, the flight schools continue their efforts to identify methods to “fly friendly” without compromising safety. These meetings are often smaller question-and-answer sessions with flight schools where Airport Noise Office staff provide current information and answer questions related to:

- Flight training activity, violations, and community concerns based on data from its Airport Noise and Operations Monitoring Systems (ANOMS).
- Supplemental Type Certificate (STC) Reimbursement¹ and the Unleaded Aviation Fuel Subsidy Programs that the Airport continues to actively promote on our various media platforms.

The Airport will also continue to meet with LBAA and upon request and/or as needed, with the General Aviation Noise Abatement Committee (GANAC), during their scheduled meetings, to discuss noise data, operational best practices, and community concerns.

Recommendation 2: Review Increasing the Noise Ordinance Violation Fee Structure

As mentioned in the March Memorandum, regulatory fines were established in 1995 with the enactment of Long Beach Municipal Code Chapter 16.43.² The fines were set at an amount that served to deter violations of the Airport Noise Ordinance. Over time, the fines have lost some of their deterrent effect because they have not been adjusted to account for increases in the cost of living and changes in economic conditions.

The City Attorney submitted a request on May 6, 2024, to the Federal Aviation Administration (FAA) for a legal opinion on a proposal to increase the fines for violations of the Airport Noise Ordinance. Specifically, the City proposed doubling the original fine amounts to adjust for inflation consistent with the United States Bureau of Labor Statistics' Consumer Price Index (CPI) Inflation Calculator and to allow for future automatic adjustments of the fine amounts to account for future inflation.

On November 20, 2024, the FAA Office of Chief Counsel issued its opinion, concluding the proposed fine increases and automatic adjustments would not trigger compliance issues with the Airport Noise and Capacity Act (ANCA) or 14 CFR Part 161, meaning the City can proceed with the amendments to its Noise Ordinance to increase the fines while continuing to maintain the Ordinance's grandfathered status under ANCA. Accordingly, the Airport will recommend that the City Attorney amend the Airport Noise Ordinance to increase the current fine amounts and to allow for future automatic adjustments to those amounts. The City Attorney will then draft the amendment for City Council approval.

Recommendation 3: Increase Community Outreach and GA Educational Materials

To provide the local community with an opportunity to hear directly from various FAA lines of business, Airport staff, the Aircraft Owners and Pilots Association (AOPA), the National Business Aviation Association (NBAA), and LBAA participated in a public informational

¹ <https://www.longbeach.gov/lgb/resources/stc-fee-reimbursement-program/>

² <https://www.longbeach.gov/globalassets/lgb/resources/noise-abatement/chapter-16-43-lgb-noise-compatibility-ordinance>

webinar³ co-hosted by the FAA and Airport, on the evening of Tuesday, June 25, 2024. While the FAA has conducted similar webinars at other airports, this webinar was the first of its kind in that it was specific to GA operations. The webinar was the largest community outreach effort regarding LGB's GA educational activity. The webinar had over 200 attendees and topics included:

- FAA's management of Southern California's complex airspace;
- Historic and current GA operations at the Airport;
- Runway utilization at the Airport;
- Flight school operations;
- Airport Noise Ordinance; and,
- Status of unleaded aviation fuel (Avgas) and its usage at the Airport and nationwide.

Webinar attendees were able to submit questions via the chat feature. The event was recorded and is available for viewing on YouTube.⁴ It currently has over 1,700 views.

The Airport has also augmented its staff for the Noise Office and is excited to announce the appointment of Justin Cook for the position of Noise Officer. Mr. Cook will serve as the Airport's noise program technical expert, leading the Noise Division team. He is a distinguished figure in the field of aviation noise management, boasting nearly 25 years of expertise that spans technical analysis, project leadership, and regulatory compliance.

Mr. Cook's professional journey has been closely intertwined with the FAA, collaborating extensively across various departments including planning, environmental, air traffic, and legal. He has assisted in developing and implementing "Fly Quiet" programs at nine airports and has played a critical role in California's aviation landscape, particularly in managing noise concerns at designated "noise problem" airports. Mr. Cook has a bachelor's degree in mathematics from the University of California, Irvine, and several certifications to include Institute of Noise Control Engineering (INCE) certification from INCE-USA, ENV SP certification from the Institute for Sustainable Infrastructure, and LEED Green Associate Certification from the U.S. Green Building Council.

Under Mr. Cook's leadership, the Airport is seeking additional Noise Division staff while current staff continue to review written correspondence, listen to complaints, investigate concerns, and issue violations when applicable.

In response to community recommendations and to better explain technical statistics, staff have updated the Monthly Noise Report that is posted on the City website and

³ <https://www.longbeach.gov/lgb/news/5-14-24-federal-aviation-administration--long-beach-airport-webinar-on-general--aviation/>

⁴ <https://www.youtube.com/live/K35RjVTPIPY?si=20Exn4mSiQUqot3O>

presented to the Airport Advisory Commission. Additionally, the Noise Division's webpage on the Airport's website was revised earlier this year to include additional data and to make it easier to locate information. Website improvements are ongoing.

Launching in January 2025, and as previously mentioned, the Airport's new FFP encourages best practices and acknowledges flight school participation. Recognitions and additional information will be published online.

Recommendation 4: Support Strong Federal Advocacy for Lead-Free Skies

On February 6, 2024, the City Council approved the 2024 Legislative Agenda (Agenda), as recommended by the Intergovernmental Affairs Committee, containing City Council-adopted objectives and directives regarding a wide array of issue areas impacting the City. The Agenda included seven objectives for the Airport, four of which address current environmental concerns of both the Airport and the surrounding community. In Spring 2024, the City submitted congressionally directed spending requests, commonly known as earmarks, for consideration in the Fiscal Year 2025 (FY 25) federal budget.

The City delegation members have submitted project requests to the Senate and House Appropriations Committees for consideration in the FY 25 federal budget. U.S. Senator Alex Padilla submitted \$1,073,000 for the Airport's Unleaded Aviation Fuel Pilot Program, which aims to accelerate the transition of aviation fuel at LGB from leaded to unleaded. If awarded, the pilot program will help meet the demand for the program and help achieve lead-free skies in and around the Airport. It should be noted that the total funding allocation could decrease through the appropriations process. Projects are only awarded if they progress through the congressional appropriations committees and are included in the final budget. Determination of earmark requests is likely to be considered when Congress reconvenes in 2025.

Currently, the City is prohibited from banning leaded aviation fuel. On May 16, 2024, President Biden signed the FAA Reauthorization Act of 2024, which mandates that certain airport owners or operators subject to federal grant assurances, including the Airport, continue to sell and allow the use of leaded aviation fuel until December 31, 2030, or until such time the FAA authorizes the use of a replacement fuel, whichever occurs earlier. On September 22, 2024, California Governor Gavin Newsom signed California Senate Bill No. 1193 (SB 1193). Authored by California State Senator Caroline Menjivar, SB 1193 prohibits an airport operator or aviation retail establishment, as defined, from selling, distributing, or otherwise making available leaded aviation gasoline to consumers on or after January 1, 2031.

Recommendation 5: Confer with FAA on Feasible Operational Solutions

To ensure that the Air Traffic Control Tower (ATCT) maintains its primary focus on the safety of aircraft operations at the Airport, the FAA has requested that the Airport submit questions on behalf of the flight community regarding feasible operational solutions to

lessen aircraft noise in the surrounding community. LBAA submitted questions to the FAA regarding various GA operational practices and air traffic considerations. The FAA Regional Administrator responded and provided clarification of operational procedures and some of these questions were addressed in the webinar. Operational safety and efficiency remain a priority. Subsequently, ATCT has hosted two informal meetings with the Airport and its tenants and is working on scheduling a third before the end of the year. These informal meetings provide a unique opportunity to discuss possible feasible operational solutions. FAA dialogue will continue.

Recommendation 6: Explore Additional Incentives for Unleaded Fuel and Fly Friendly Program

At the request of the Mayor and City Council in October 2022, the Airport began identifying and formalizing incentives to facilitate and expedite the transition to Unleaded Avgas. Below are updates on significant milestones:

- In November 2023, following the release of the GA Report, the City Council authorized the STC Fee Reimbursement Program. To date, there has been a total of 15 STC reimbursements made. Program outreach and awareness initiatives by Airport staff are ongoing.
- In January 2024, the City Council authorized an Unleaded Aviation Fuel Subsidy Program to minimize the cost differential between leaded and unleaded Avgas. From July 2024 through October 2024, a total of approximately 727 gallons of unleaded fuel has been sold at the Airport.

The Airport will continue to work with aviation industry organizations and federal partners to support the local and national efforts to eliminate lead emissions from GA aircraft operations. The industry is continuing to advance the development of unleaded fuels. The Airport will continue to closely monitor these developments and share information with GA tenants.

Recommendation 7: Explore with FAA Temporary Moratorium on New Flight Schools Business Licenses

In 2023, Sling Flying Academy, LLC sued the City of Torrance over Torrance's enforcement of a 1977 resolution which limited the number of flight school licenses to six. Before the case could proceed to trial, the parties settled the lawsuit. The trial court ruled on a preliminary injunction before settlement, but the opinion had little precedential value for LGB, since Torrance Airport does not accept Airport Improvement Program (AIP) funds.

Most airports that do not accept grants are GA airports that do not have commercial service, like Torrance Airport. AIP grants are essential to sustaining commercial service at LGB. It is important to understand that the AIP funds a variety of airport projects, including infrastructure, safety and security, noise compatibility, terminals and hangars,

etc. LGB is an integral part of the National Airspace System (NAS) and accepting grants lays the foundation for safe operation of aircraft and strengthens our nation's aviation infrastructure.

As previously stated, the FAA would likely view a limitation on flight school licenses as a violation of Grant Assurance 22, which prevents airports from restricting a particular category of aircraft operations. Because limiting the number of licenses could result in restricting GA operations, it will likely be found to be a violation of the grant assurance.

It should be noted that limiting the number of flight school licenses would not necessarily result in a reduction in the amount of noise. Larger flight schools operate more aircraft than smaller ones. Accordingly, if a single larger school has a license to operate at the Airport, it could be responsible for the same number of operations as five or more smaller flight schools. The City, however, could not restrict licenses based on the number of operations, as that would be a clear violation of Grant Assurance 22.

Based on the foregoing from the City Attorney, pursuing a moratorium on new flight school business licenses at this time does not appear warranted and the Airport will continue to explore more effective options for noise abatement.

Updated GA Information on Runways 26R and 26L Operations

The following two charts provide updated data for Runways 26L and 26R. Exhibit 1, a five-year annual comparison chart, highlights daily propeller and turbo-propeller departures on Runway 26R. Since mid-June 2024, the number of GA departures on Runway 26R have decreased well below 2023 levels. Exhibit 2 provides a two-year comparison of the percentage of total operations for Runways 26L versus 26R. The percentage of total operations on Runway 26L has increased since June 2024 and is approximately 68-70 percent—consistent with the historical use of Runway 26L as the primary GA runway.

Exhibit 1 – Five Year Annual Comparison of GA Departures on Runway 26R

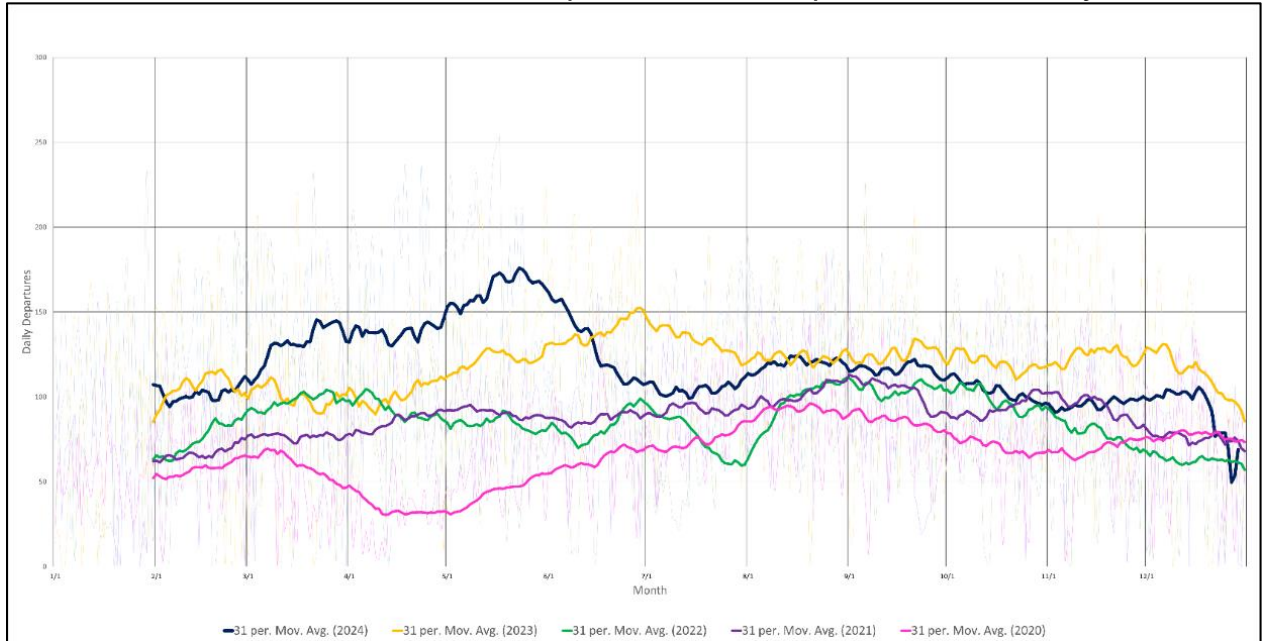
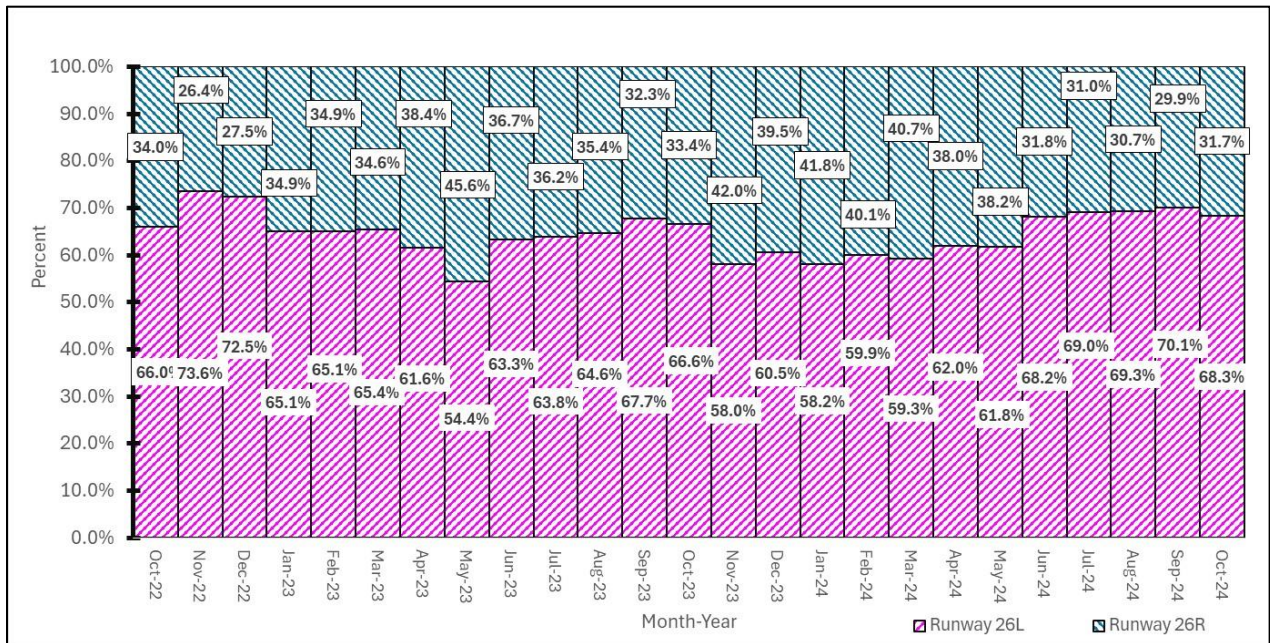
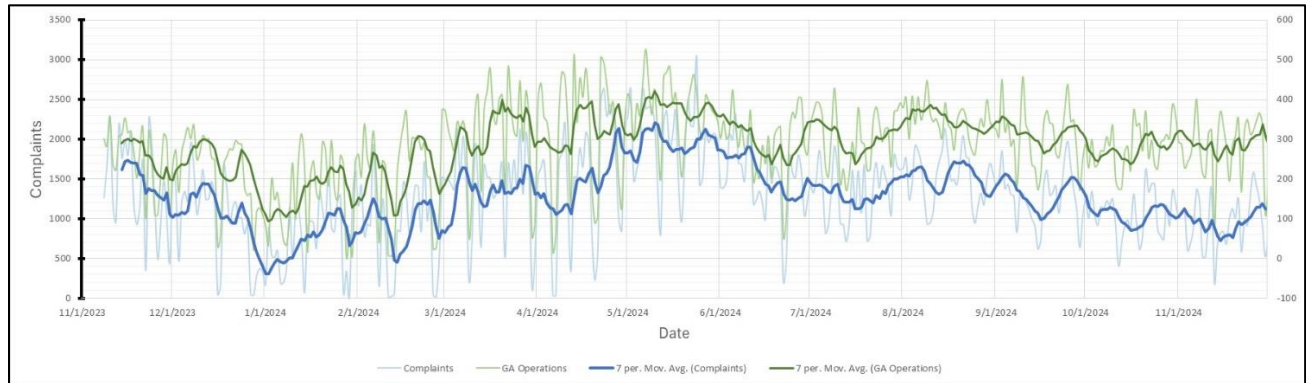


Exhibit 2 – Monthly Runway 26R vs. Runway 26L, Percentage of Total Operations October 2022 – October 2024



The following chart, Exhibit 3, provides data for total noise complaints compared to GA operations. Beginning around November 2023, there is a direct correlation between the number of GA operations to the total number of noise complaints.

*Exhibit 3 – Total Noise Complaints vs. GA Operations
November 2023 – November 2024*



Next Steps

The Airport will continue to remain engaged on these recommendations and recognizes that although there is progress, there are continuing efforts that will take additional time. Airport staff will continue to provide pertinent updates as they may become available. Should you have any questions, please contact me at (562) 570-2605.

ATTACHMENT

CC: DAWN MCINTOSH, CITY ATTORNEY
DOUGLAS P. HAUBERT, CITY PROSECUTOR
LAURA L. DOUD, CITY AUDITOR
APRIL WALKER, ASSISTANT CITY MANAGER
TERESA CHANDLER, DEPUTY CITY MANAGER
MEREDITH REYNOLDS, DEPUTY CITY MANAGER
GRACE YOON, DEPUTY CITY MANAGER
TYLER BONANNO-CURLEY, DEPUTY CITY MANAGER
KEVIN LEE, CHIEF PUBLIC AFFAIRS OFFICER
MONIQUE DE LA GARZA, CITY CLERK
DEPARTMENT HEADS



Key Performance Metrics

Evening Departures

| | |
|--|--|
|  <p>goal REDUCE the number of evening (19:00 - 22:00) Runway 26R departures</p> |  <p>measure TOTAL departures during evening hours</p> |
|--|--|

Average Noise Level

| | |
|--|---|
|  <p>goal PRODUCE the least amount of measurable noise from Runway 26R departures</p> |  <p>measure AVERAGE Sound Exposure Level (SEL) at Remote Monitoring Terminal (RMT) #6</p> |
|--|---|

Nighttime Departures

| | |
|--|--|
|  <p>goal REDUCE the number of nighttime (22:00-7:00) departures</p> |  <p>measure TOTAL departures during nighttime hours</p> |
|--|--|

Average Altitude

| | |
|--|--|
|  <p>goal INCREASE altitude from Runway 26R departures</p> |  <p>measure AVERAGE altitude (feet) at Runway 26R analysis gate</p> |
|--|--|



Key Performance Metrics

Evening Departures

goal



REDUCE
the number of evening
(19:00 - 22:00) Runway
26R departures



measure

TOTAL
departures during evening
hours

Average Noise Level

goal



PRODUCE
the least amount of
measurable noise from
Runway 26R departures



measure

AVERAGE
Sound Exposure Level (SEL)
at Remote Monitoring
Terminal (RMT) #6

Nighttime Departures

goal



REDUCE
the number of nighttime
(22:00-7:00) departures



measure

TOTAL
departures during nighttime
hours

Average Altitude

goal



INCREASE
altitude from Runway 26R
departures



measure

AVERAGE
altitude (feet) at Runway
26R analysis gate