

Torrance Planning Commission Meeting 5/20/2015

TO: Members of the Planning Commission

RE: Proposal to build an automobile sales/display lot within the Runway Protection Zone

South Bay Lexus is proposing to build a development for the storage and display of automobiles. Their proposal shows the installation of 14' light standards and it is clearly designed to attract the public into this development for sales purposes. The Torrance Land Management Team recommends expansion of the dealer's current lease to accommodate this development.

This proposal to is seriously flawed and must be REJECTED for many reasons!

What is a Runway Protection Zone?



As shown above, the RPZ is an area off the runway end. It is trapezoidal in shape and centered about the extended runway centerline. The RPZ dimensions for a particular runway end is a function of the type of aircraft and minimum approach visibility associated with that runway end. Torrance runway 29R is served by a precision approach Instrument Landing System (ILS). The FAA, in its Advisory Circular AC-150/13A (Airport Design, dated 2/26/2014) defines the dimensions for precision approaches: 1,000' wide at the runway end, 2,500' long and 1,750' wide at the outer end.

Torrance Planning Commission Meeting 5/20/2015

Approach protection zones were originally established to define land areas underneath aircraft approach paths in which control by the airport operator was highly desirable to prevent the creation of air navigation hazards. Guidelines were developed recommending that clear zones **be kept free of structures and any development that would create a place of public assembly.**

Why is the RPZ important?

The RPZ's function is to enhance the **safety and protection of people** and property on the ground. A properly maintained RPZ is a key safety element in airport operations. Instead of adding more incompatible developments in the RPZ and diminishing airport safety, the City of Torrance should be working to remove them.

This proposal to is seriously flawed; there are many reasons to REJECT it!

REASON 1: IT INTERFERES WITH THE PILOTS ABILITY TO LAND SAFELY

During an instrument approach in low-visibility night landings, the ability of pilots to land safely on runway 29R hinges on their visual recognition of the runway environment (approach lights and runway threshold) when reaching decision height. Prior to this point in the flight, the pilot is totally focused on the instruments in the cockpit. At decision height (284' above the ground and about 3/4 mi from the runway), the pilot must look up and out the windshield, locate and identify the runway, and make a landing--all within a few seconds!

Keep in mind that the runway lights and the development's lights will be at the very edge of the pilot's visibility and the aircraft is moving at two miles or more per minute! It will cover the distance to the runway in 20 seconds or less!

In some instances, extraneous lighting has caused pilots to incorrectly identify the wrong lights as the runway lights--resulting in unhappy consequences.

The addition of these extraneous lights approximately 390' from the approach path (less than the width of your fist held at arm's length) will make it difficult to correctly identify these critical runway landmarks --making landing more difficult and increasing the potential for an accident.

The positioning of misleading lights which would cause confusion to pilots or which would cause glare or reduce visibility for airport operations is not approved by the FAA for safety reasons. (AC 150/5300-13 Section 211(a)(8) Object clearing criteria).

REASON 2: IT IS CONTRARY TO THE CITY'S RESPONSIBILITIES AS AIRPORT OWNER

The FAA, in its Advisory Circular AC-150/5300-13A (Airport Design, dated 2/26/2014) states: ". ***It is desirable to clear the entire RPZ of all above-ground objects.*** Where this is impractical, airport owners, as a minimum, ***should maintain the RPZ clear of all facilities***

Torrance Planning Commission Meeting 5/20/2015

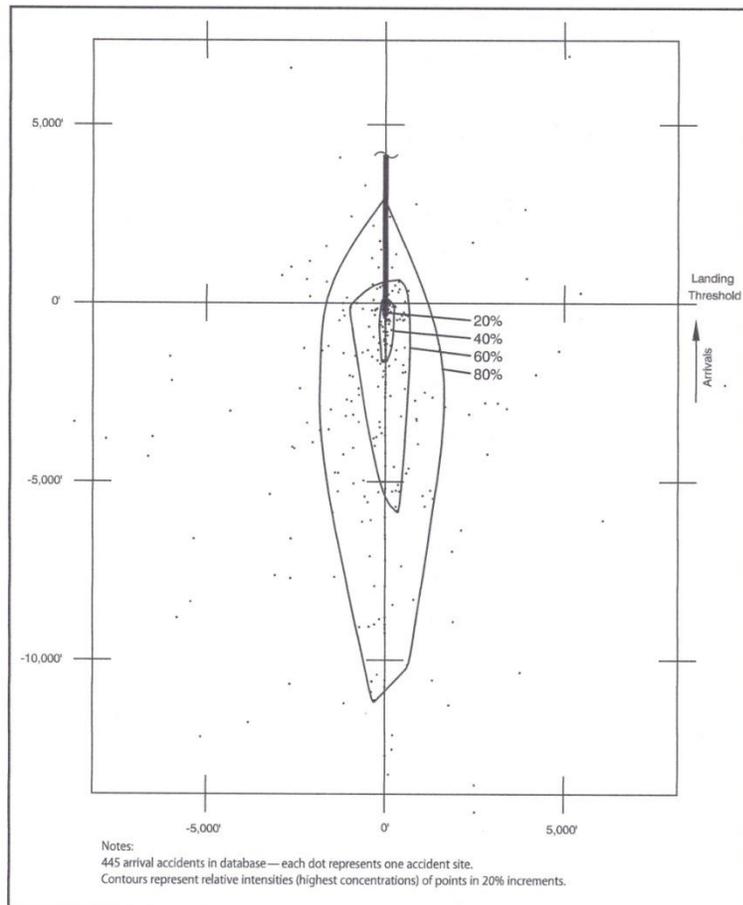
supporting incompatible activities. That document also lists RPZ land uses requiring FAA review and includes "*Transportation facilities (Rail, roads, **parking**).*" [emphasis added]

The City is responsible for clearing RPZ areas (and maintaining them clear) of incompatible above-ground objects and activities.

REASON 3: IT WOULD PLACE CUSTOMERS AND EMPLOYEES IN DANGER

The proposed development lies mostly within the RPZ. This proposal would, according to the City's recommendation, enable South Bay Lexus to ". . .*move its sales and leasing operation. . . to this area.*" South Bay Lexus' own documents clearly show "*pedestrian paths*" leading into the area and the parking spaces therein are labeled "*inventory/display.*"

The United States Air Force conducted a five year study of accidents within a 10 nautical mile radius of airfields and found that 75% of all accidents that occur near a runway occur in the RPZ.



The diagram at left illustrates how the California Dept of Transportation's Airport Land Use Planning Handbook, Appendix E (October 2011) looked at the issue of aircraft crashes near airports using risk assessment methodology and concluded: "*Not surprisingly, the data shows the highest level of risk occurs immediately beyond the runway ends. These risks . . . are **typically contained within the limits of the airport's runway protection zones (RPZs).***" [emphasis added]

REASON 4: THIS LAND USE IS NOT APPROVED BY THE FAA

The FAA policy is to protect the public investment in the national airport system. To implement this policy, the FAA studies existing and proposed objects and activities with respect to their effect on the safe and efficient use of the airports and safety of persons and property on the ground. **These**

objects need not be obstructions to air navigation, as defined in 14 CFR Part 77. As a result of the study, the FAA may issue an advisory recommendation in opposition to the

Torrance Planning Commission Meeting 5/20/2015

presence of any activity in the vicinity of a public use airport that conflicts with an airport planning or design standard or recommendation. **No such study has been requested; no such study has been performed.**

On 1/17/2015, I spoke with FAA's Airports Division of the Western-Pacific Region (Pat Lammering--Assistant Los Angeles Airports District Office). They are **NOT in favor of ANY such development in the RPZ.**

REASON 5: IT POTENTIALLY EXPOSES THE CITY AND ITS TAXPAYERS TO LIABILITY

The collision of an aircraft with a parking lot full of 2-4,000 lb automobiles would be catastrophic. It would cause loss of the aircraft, possible loss of income for the aircraft owner/operator, injury or death to its occupants, damage to the dealer's facilities, and possible injury or death to the dealer's employees and customers in that area. This raises a number of crucial questions:

1. What is the liability to the taxpayers if the City recommends and approves this incompatible land use within the RPZ--would such an accident expose the City to liability for any such claims?
2. Would South Bay Lexus purchase insurance to cover any such claims against the City for the remainder of the lease?
3. Will South Bay Lexus purchase a bond to guarantee removal of this development if it discontinues this insurance at any time or goes out of business?
4. Would this liability also be shared by the Lexus dealer because he knowingly constructed the hazard and exposed his employees and customers to a known danger?

Should the City of Torrance commit itself and its taxpayers to yet another unfunded liability?

REASON 6: IT IS UNNECESSARY



The photo at the left (taken last year) shows ample unused area in which to place inventory and display vehicles without endangering airport operations, the public, or employees. There is also clearly **sufficient room to build a parking structure to accommodate those needs** without creating liability for Lexus dealer, for the City, and for its taxpayers.

REASON 7: IT WAS UNANIMOUSLY REJECTED BY THE AIRPORT COMMISSION

After hearing these safety concerns spelled out in a similar presentation on February 5, 2015,

Torrance Planning Commission Meeting 5/20/2015

the Lexus dealer's proposal and the Torrance Land Management team's recommendation were unanimously rejected by the Airport Commission.

CONCLUSION

Just because the city **may** be able to approve this development over the objections that have been raised, **it is NOT prudent to do so**. Instead of **ADDING** new incompatible developments in the RPZ, our city should be working, as airport owner, to **REMOVE** existing incompatible land uses. Instead of **INCREASING** risks to the aviation community and the public, it should be working to **REDUCE** that risk. Instead of **ADDING** to the City's liability, it should be finding ways to **ELIMINATE** that liability.

The Torrance Airport Association urges the Planning Commission to carefully consider the unnecessary risks this proposal presents to the aviation community, to the public and to Torrance taxpayers.

We urge you to REJECT this proposal and the Torrance Land Management team's recommendation.

Jim Gates, VP
Torrance Airport Association