

1 July 2019

Patrick Sullivan, City Attorney  
City of Torrance  
3031 Torrance Blvd.  
Torrance, CA 90503

Subject: Early left turn violation letters

Dear Mr Sullivan:

In the past several months, a number of our members have received a letter from the Community Development Department entitled "EARLY LEFT TURN VIOLATION." It cites Torrance Municipal Code Section 51.2.3.e ("*Aircraft taking off to the west shall not turn left until they have either reached the ocean or attained an altitude of fifteen hundred (1,500) feet.*") as the basis for the "violation." It further states that "*future violations are subject to enforcement.*"

As stated on the FAA's web site:

*"Congress has provided the FAA with **exclusive authority** to regulate aviation safety, the efficiency of the navigable airspace, and air traffic control, among other things. **State and local governments are not permitted to regulate any type of aircraft operations, such as flight paths or altitudes, or the navigable airspace.***

***Cities and municipalities are not permitted to have their own rules or regulations governing the operation of aircraft.*** [emphasis added]

In other words, the FAA's Federal Aviation Regulations (FARs) are the only rules that apply to aircraft operations, including flight paths and altitudes. Torrance Municipal Codes clearly do not apply and may, in fact, be an improper encroachment of the exclusive authority given to the FAA by Congress.

While Torrance pilots may voluntarily comply with the City's recommendations (and they generally do), they are not required to do so. Their flights are only required to be made in coordination with the Air Traffic Control Tower (as specified in the FARs) while in Class D airspace.

I request that you advise me which of the FAA's Federal Aviation Regulation you believe are being "violated" by these pilots, under what authority you are issuing these "violations," and what "enforcement of future violations" means.

Respectfully,

Jim Gates  
Torrance Airport Association  
2785 Pacific Coast Highway E164  
Torrance, CA 90505

CC: Phil Bradshaw  
Oscar Martinez  
Airport Commission  
Arjun Garg, FAA Chief Counsel