



April 5, 2023

Filed Electronically via <https://oeaaa.faa.gov>

Re: Circularization Comments for ASN 2024-AWP-238-OE

On behalf of the Aircraft Owners and Pilots Association (AOPA), National Air Transportation Association (NATA), National Business Aviation Association (NBAA), and Vertical Aviation International (VAI), we would like to provide input and express our concerns regarding Relativity Space's proposal for a 200'-foot tower at Long Beach Airport (LGB) for static testing.

We are excited about the innovation, jobs and new opportunities Relativity Space brings to Long Beach. We believe in their mission and want to see them succeed. Local stakeholders also appreciated the December 2023 presentation provided by Relativity and Long Beach Airport, emphasizing the project's significance in potentially setting a precedent for commercial space manufacturing. However, the Los Angeles and Orange County airspace is intricate, and the tower's proximity to the runway complex raises potential implications for flight patterns, aircraft navigation, noise contours, and safety and environmental impacts on airport operations and communities. As such, we respectfully request that strong consideration is given to building the tower test stand further away from the airport where it would allow for an appropriate safety buffer. This review should include strong consideration of:

- collision hazard of the tower itself due to its dimensions,
- specific information on markings and lighting,
- impacts on long standing operational emergency procedures,
- air traffic control tower visibility, and
- airport geometry.

The proposed placement of the tower may likely result in increased off airport noise or flight path impacts to the community because of the potential for changes to helicopter routes, requiring them to fly farther west into the neighboring residential community to avoid the tower. The project may also impact future flight paths for electrical vertical takeoff and landing aircraft (eVTOL), whose autonomous flight activity in visual or instrument conditions has not been completely vetted at LGB Airport. Please note that current FAA charts reflect helicopter patterns or approaches over neighborhoods west of the proposed tower, which is not consistent with current voluntary efforts of LGB users who now operate within the airport environment. As a result of those efforts to reduce impacts in the community, helicopters now operate in close proximity to the tower's proposed location.

During the FAA's reevaluation of the new Form 7460 submittal from Relativity and given the potential of safety risk and community impacts from revised operational procedures, additional,

thoughtful review is required to ascertain the noise impacts to populated areas resulting from a flight path change.

To eliminate continuing community concerns that may result from this project, a full transparent process with all stakeholders is needed, which should include a review of alternative locations for such a tower to avoid introducing new risks.

Again, we are excited about the opportunities Relativity brings to the community, are supportive of their success, and want to ensure that success is enabled in a safe and sustainable manner for the Long Beach community. As such, our associations look forward to continuing a collaborative dialogue between the FAA, Airport and LGB aircraft operators, and the local aerospace industry.

Thank you for your consideration of our comments and input.

Sincerely,

Aircraft Owners and Pilots Association (AOPA)
National Air Transportation Association (NATA)
National Business Aviation Association (NBAA)
Vertical Aviation International (VAI)