



July 21, 2023

Jefferson County Commissioners
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Re: Request for Immediate Operational Changes at RMMA

Dear Commissioners Dahlkemper, Kerr, and Kraft-Tharp; Director Anslow; and Mr. Bauer:

Over the past few years, air traffic flying over Superior neighborhoods has increased dramatically, mostly from single-engine propeller planes operated by flight schools based at Rocky Mountain Metropolitan Airport (RMMA). These flights are polluting Superior -- with noise from their near-constant operations and by lead particulates emitted from the combustion of leaded fuel used by the flight school aircraft. While Superior has patiently waited for the RMMA Community Noise Roundtable (CNR) to offer solutions to this increasing problem, the problem is getting worse. Consequently, we are requesting that you take immediate steps to protect the health, safety, and welfare of our residents by implementing the following reasonable solutions. Many of these solutions provide a common sense approach to reducing the number of touch-and-go operations from the flight schools and are highly unlikely to impact growing commercial and private jet operations at the airport.

1. Landing Fees

Landing fees are commonplace at airports and have several benefits. In addition to providing an important new revenue source to fund airport operations, they can supplement any potential revenue losses resulting from decreased fuel sales that could be realized if flight operations decrease and/or could be used to pay for more robust programs to educate pilots on the noise sensitive areas. Consequently, landing fees have been adopted by general aviation airports around the country, including but not limited to: Aspen/Pitkin County Airport, Eagle County Regional Airport, Telluride Regional Airport, Chattanooga Airport, Coleman A. Young International Airport, Concorde Padgett Regional Airport, Perot Field Fort Worth Alliance Airport, Hayward Executive Airport, Palo Alto Airport, Teterboro Airport, Charles M. Schulz Sonoma County Airport. Many larger airports including Denver International Airport, Dallas/Fort Worth International Airport, Palm Beach International Airport, and Southwest Florida International Airport have also adopted landing fees.

Landing fees work. They decrease operations -- leading to fewer noise complaints, while increasing revenues to the airport. They are a win/win for all parties. Currently, RMMA does not impose landing fees on any aircraft operations. Director Anslow, however, has stated that he would implement them if instructed to do so by the Jefferson County BOCC. Accordingly, we respectfully request that the Jefferson County BOCC immediately give such direction to implement a reasonable landing fee of twenty dollars (\$20.00) to be imposed on each landing by every aircraft that lands at RMMA.

2. Curfew

Over the past few weeks, we have heard from several residents who were awoken in the middle of the night (one at 3:00 a.m.) due to pilots flying tight loops around RMMA and over Superior to practice touch-and-go landings. There is no good reason for training activities to occur at 3:00 a.m. while people are sleeping. This problem could be solved immediately if the airport adopted a curfew that prohibits training flights between the hours of 9:00 p.m. and 7:00 a.m.

In fact, such a curfew will be consistent with the intent of the "Fly Quiet Program" listed on RMMA's website (<https://www.jeffco.us/1694/Fly-Quiet-Program>), but which is not currently being enforced.¹ According to that program, "Flight schools, located on field, have voluntarily stopped departures in the evening hours beginning at 10:00 pm local time. Aircraft from the flight schools shall not depart after this, excepting [*sic*] when required to do so for currency or training in accordance with federal regulations." Notwithstanding this language, it's clear that not all flight schools are complying with these voluntary restrictions.

¹ As a starting point, RMMA should fully utilize Whispertrack (<https://whispertrack.com/airports/KBJC>) to adequately communicate noise abatement procedures to pilots flying in and out of the airport.

Despite the airport's previous efforts, the Fly Quiet Program has not sufficiently curtailed evening operations. Accordingly, we respectfully request a mandatory curfew that prohibits training flights between 9:00 p.m. and 7:00 a.m.

3. Close Runway 30L/12R at Night

Runway 30L/12R is the runway that primarily sends flight school traffic over Superior residents. Despite the fact that Runway 30R/12L is the runway designated as the "primary, calm-wind runway" under the Fly Quiet Program, for some reason, flight school traffic seems to prefer runway 30L/12R (instead of 30R/12L which would be consistent with the Fly Quiet Program) as they fly loops around the airport and practice touch-and-go landings.

To address the failure of pilots to abide by the Fly Quiet Program, we respectfully request that RMMA close runway 30L/12R between the hours of 9:00 p.m. and 7:00 a.m., except for emergency operations. As you are aware, there are considerably fewer flights out of RMMA at night than during the day. This proposed runway closure would primarily impact the flight schools who are currently not complying with the Fly Quiet Program and would instead, force them into compliance.

4. Touch-and-Go Operations

Most of the noise and lead pollution concerns (addressed below) are a direct result of the flight schools that fly loops over Superior while performing repeated touch-and-go landings at RMMA. 10-15 loops in a single training flight are relatively uncommon at other regional airports, but are commonplace at RMMA. When there are four or five training flights in a pattern, with each aircraft flying loops over Superior, the result is an overflight above our residents' homes every minute. There is no peace and quiet. Our residents are incapable of working from home, opening their windows, or sleeping soundly at night. The noise generated from these training loops is made significantly worse because of the accepted practice of touch-and-go landings at RMMA.

In addition to the noise generated by touch-and-go operations over residential areas, there are public health and safety concerns as well, including accidents and emergencies that can put both our residents and pilots in danger. Furthermore, lead particulates emitted from these training operations are concentrated repeatedly over a specific area in our town.

To address this problem, airports across the country have restricted touch-and-go operations with formal noise abatement policies, rather than the ineffective voluntary noise abatement policies like what is currently in place at RMMA. For example, Long Beach Airport prohibits touch-and-go, stop-and-go, and other noise intensive activities between 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 3:00 p.m. on weekends and holidays. Hanscom Field has adopted regulations that "prohibit 11:00 p.m. to 7:00 a.m. touch and go activity; prohibit touch and go activity by aircraft weighing over 12,500 pounds; and prohibit activity by Stage I Aircraft over 12,500 pounds. These rules also include a fee for 11:00 p.m. to

7:00 a.m. operations.” Fullerton Airport prohibits touch-and-go operations between 6:00 p.m. and 7:00 a.m. on weekends & holidays.

Accordingly, we respectfully request that RMMA implement a restriction on touch-and-go operations. At a minimum, such operations should be prohibited during evening hours, between 9:00 p.m. and 7:00 a.m., and limited during daytime hours to no more than 4 landings per every 2 hours in a single flight.

5. Unleaded Fuel

Finally, we are following up with our previous request to ban the sale of leaded fuel and instead, transition to the sale of unleaded fuel for all aircraft flying out of RMMA. In the County’s response dated May 10, 2023, the Jefferson County BOCC indicated that it “supports” phasing-out leaded avgas “as soon as practical,” but it did not commit to doing so before the 2030 target date set by the FAA/EPA. This is disappointing.

As you may know, Centennial Airport recently announced that it will now offer UL94 unleaded aviation gasoline. We applaud Centennial Airport’s proactive approach and believe that RMMA should follow Centennial Airport’s lead and aggressively move to beat the 2030 goal under the FAA’s Eliminate Aviation Gas Lead Emissions (EAGLE) program, which has a goal of 2030 for the nationwide transition from 100LL to unleaded fuel.

Notably, RMMA has not asked for assistance from the Federal Government to help it transition sooner to selling only unleaded fuels through the FAA Reauthorization bill currently pending before Congress. We respectfully request that Jefferson County seek assistance and participate in the FAA Reauthorization process now with the goal of eliminating leaded fuel sales as soon as possible. The public health and environmental concerns of the residents who live in the immediate vicinity of RMMA should not be sacrificed to the interests of the aviation industry.

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Thank you for your time and attention to these matters. Given the urgency of the issues and the concerns expressed by our community members, we request your response by August 15, 2023.

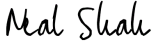
Respectfully,
Town of Superior, Board of Trustees

Mark Lacis, Mayor

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Neal Shah, Mayor Pro-tem

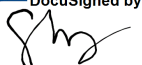
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Jenn Kaaoush, Trustee

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Stephanie Miller, Trustee

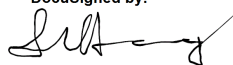
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Bob McCool, Trustee

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Sandie Hammerly, Trustee

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cc: Senator Michael Bennet
Senator John Hickenlooper
Representative Joe Neguse
Representative Brittany Pettersen

Flight Schools:

ATP Flight School

McAir Aviation

Rocky Mountain Flight School

Spartan College - Broomfield Campus

Western Flight Academy