

No. 26-1008

In the
UNITED STATES COURT OF APPEALS
For the District of Columbia Circuit

CITY OF LAFAYETTE, a Colorado home rule municipality,
Petitioner,

v.

FEDERAL AVIATION ADMINISTRATION, and BRYAN BEDFORD, in his
official capacity as Administrator, Federal Aviation Administration,
Respondents

PETITION FOR REVIEW OF AGENCY ORDER
[Federal Rules of Appellate Procedure, Rule 15]
[49 U.S.C. § 46110(a)]

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Attorneys for Petitioner City of Lafayette, Colorado

Pursuant to 49 U.S.C. § 46110, Rule 15(a) of the Federal Rules of Appellate Procedure, and Circuit Rule 15-1, Petitioner, the City of Lafayette, Colorado (the “City”), hereby petitions the United States Court of Appeals for the District of Columbia Circuit for review of the Federal Aviation Administration’s decision issued on November 10, 2025, entitled Rocky Mountain Metro Tower Letter to Airmen: LTA-BJC-11 (“LTA”). A copy of the LTA is attached as Exhibit A to this Petition.

The City seeks relief on the grounds that the above-referenced decisions are arbitrary, capricious, an abuse of discretion, and otherwise not in accordance with law or supported by substantial evidence, and were issued in violation of laws including, but not limited to, the Administrative Procedure Act, 5 U.S.C. § 500 *et seq.*; the National Environmental Policy Act, 42 U.S.C. § 4321 *et seq.*; the National Historic Preservation Act, 54 U.S.C. § 300101 *et seq.*; and the Department of Transportation Act, 49 U.S.C. § 303(c).

RULE 26.1 DISCLOSURE STATEMENT

Petitioner City of Lafayette is a home rule municipality in the State of Colorado, and not a “nongovernmental corporate entity.” Accordingly, Petitioner is not required to file a corporate disclosure statement pursuant to Federal Rule of Appellate Procedure 26.1(a).

Respectfully Submitted,

Dated: January 9, 2026 LEECH TISHMAN NELSON HARDIMAN, INC.

By: _____
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Exhibit A

DEPARTMENT OF TRANSPORTATION
Federal Aviation Administration

notams.aim.faa.gov/lta/main/viewlta?lookupid=3762970470056465553

Rocky Mountain Metro Tower
11001 Control Tower Drive
Westminster, CO 80021

Issued: 11/10/2025 2058 (UTC) Effective: 12/12/2025 1200 (UTC)

Rocky Mountain Metro Tower Letter to Airmen: LTA-BJC-11

Subject: BJC VFR Arrival/Departure Transition Routes

Cancellation: 12/10/2027 1200 (UTC)

Rocky Mountain Metro Airport (BJC) has seen a notable surge in TCAS resolution alerts and close proximity incidents. A contributing factor to this increase has been a lack of route structure for aircraft entering, exiting, and transitioning the airspace.

Due to mountainous terrain and the Denver Class B airspace, aircraft around BJC are funneled through a north-south orientation to transit the Denver Metro Area. BJC has 4 flight schools based at the airport and there are additional flight schools based at surrounding airports. Additionally, BJC handles hundreds of IFR & VFR operations per day. This increasingly complex airspace has created the need to develop uncharted VFR transition routes.

Uncharted VFR Arrival and Departure routes have been developed using visual landmarks and VFR waypoints integrated into the GPS database. These routes aim to reduce frequency congestion and simplify instructions for VFR flights landing, departing, and transitioning BJC.

Application of these uncharted arrival, departure, and transition procedures, or any action taken by ATC to avoid traffic conflicts, does not relieve pilots of the responsibility to see and avoid other traffic while operating under Visual Flight Rules (14CFR 91.113).

To assist ATC with enhancing the safety of operations near BJC, pilots should:

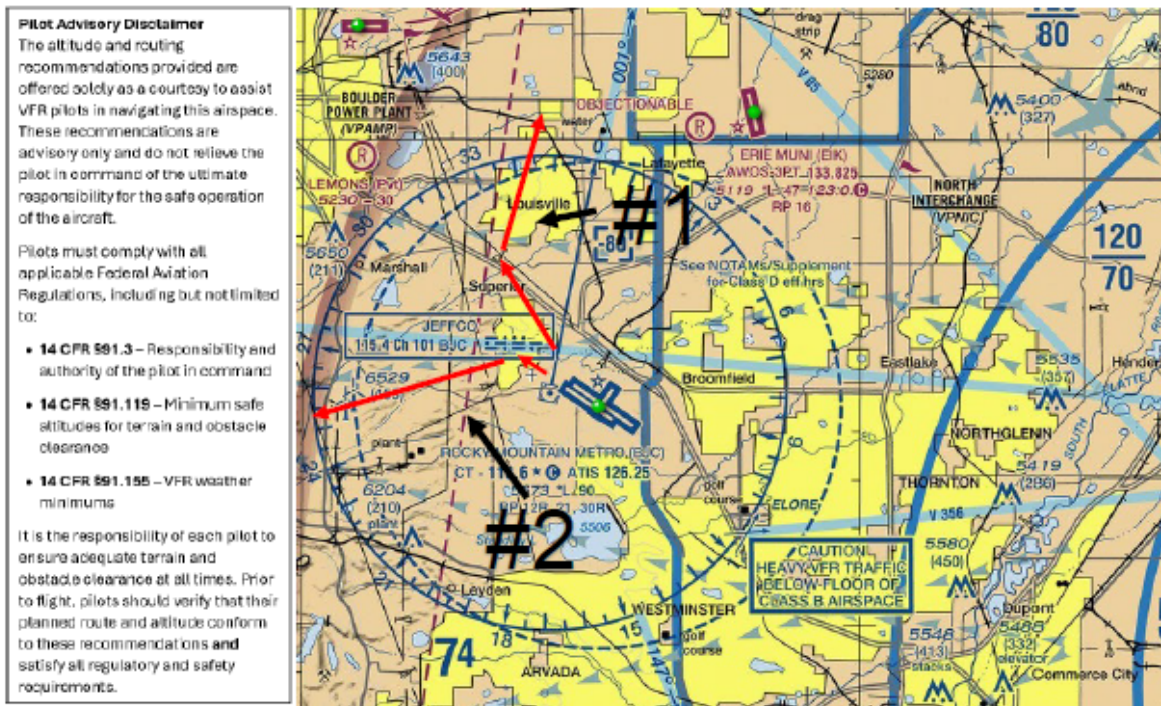
- Familiarize themselves with the airspace.
- Familiarize themselves with the airport layout and information prior to flight.
- Actively listen to ATC instructions and clearances to ensure instructions are understood.

- Read back instructions and clearances.
- Request transition route with GC on Departure or on initial call with ATC when inbound.
- **Ask ATC if there is any doubt about the VFR route assigned.**

Nathan Zuck

Air Traffic Manager, Rocky Mountain Metro Tower

RUNWAY 30 L/R DEPARTURE ROUTES



1. Home Depot Departure:

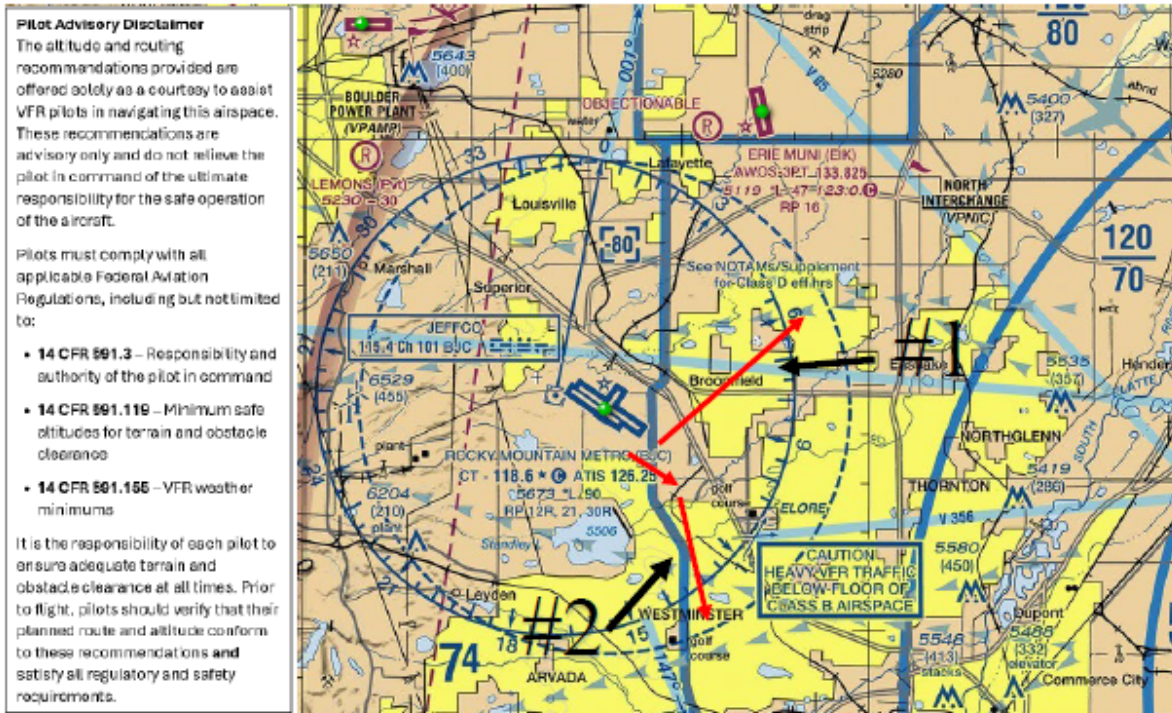
Runway 30R: At or after the departure end of the runway, turn toward Home Depot. Then proceed north toward Striped Field until exiting BJC Class D airspace. Once clear of Class D, resume own navigation.

Runway 30L: Fly straight out until instructed by BJC ATCT to turn toward Home Depot. Then proceed north toward Striped Field until exiting BJC Class D airspace. Once clear of Class D, resume own navigation.

2. Windfarm Departure:

Runway 30L/R: Fly straight out until approved by BJC ATCT to turn toward the Windfarm. Once clear of BJC Class D airspace, resume own navigation and remain outside of Class D.

RUNWAY 12 L/R DEPARTURE ROUTES



1. North Interchange Departure:

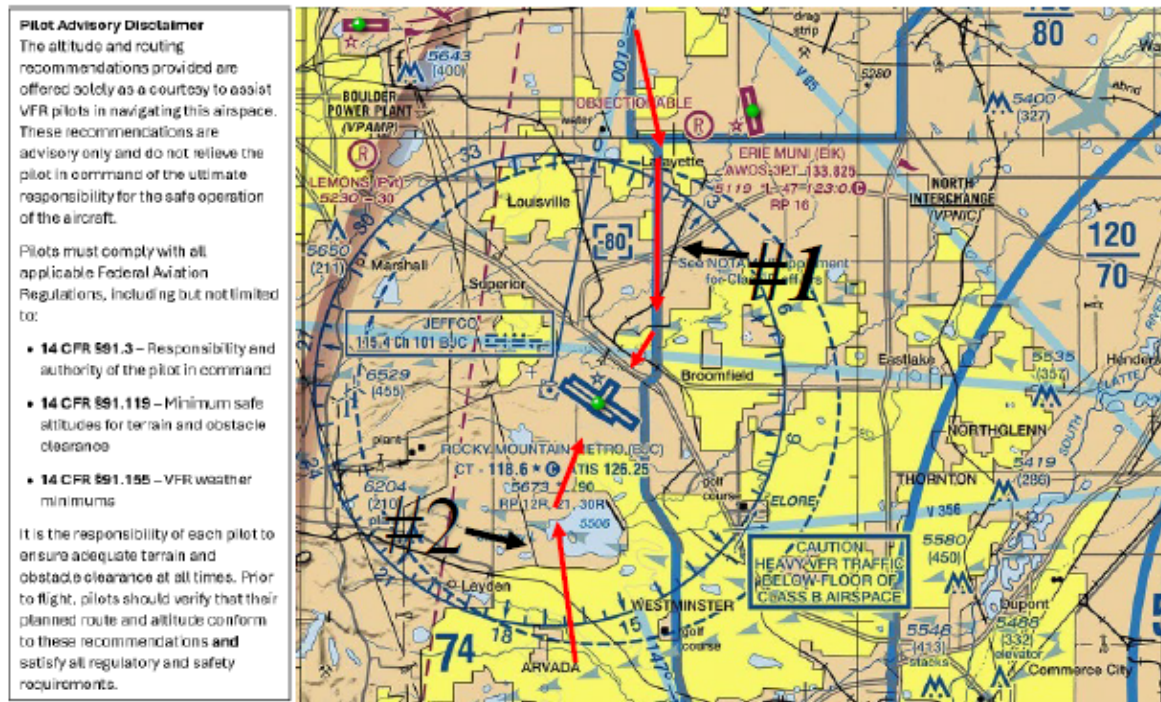
Runway 12L: At or after the departure end of the runway fly toward the North Interchange. Once clear of BJC Class D airspace, resume own navigation.

Runway 12R: Fly straight out until instructed by BJC ATCT to fly toward the North Interchange. Once clear of BJC Class D airspace, resume own navigation.

2. VPINT Departure:

Runway 12L/R: Fly straight out until instructed by BJC ATCT to turn southbound. Then fly toward VPINT. Remain east of Wadsworth Blvd. until exiting BJC Class D airspace; when clear of Class D, resume own navigation. Use caution for any active TFRs.

RUNWAY 12/30 L/R ARRIVAL ROUTES



1. 287 Arrival:

Fly inbound following Highway 287. Make initial call to BJC ATCT not more than 10 miles from BJC Airport. Enter BJC Class D airspace at or below 7,000 MSL descending to pattern altitude. Enter a midfield L/R downwind as instructed by BJC ATCT.

2. Standley Lake Arrival:

Fly inbound from the south to overfly the west shore of Standley Lake. Make initial call to BJC ATCT not more than 10 miles from BJC Airport. Enter BJC Class D airspace at or above 7,000 MSL. BJC ATCT will instruct to enter a midfield L/R downwind and will advise when to descend.