



May 19, 2025

City of Longmont
ATTN: Mayor Joan Peck
350 Kimbark St.
Longmont, CO 80501

TRANSMITTED VIA ELECTRONIC MAIL TO: joan.peck@longmontcolorado.gov

Re: Considering Landing Fees at Vance Brand Airport

Dear Mayor Peck:

The undersigned state and national aviation advocacy organizations request that you and your fellow city leaders very carefully consider the potential implementation of landing fees at Vance Brand airport with thoughtfulness and an open mind. The Aircraft Owners and Pilots Association (AOPA) is the largest aviation membership organization in the world, representing over 300,000 pilots and aircraft owners and the Colorado Pilots Association (CPA) represents over 700 members in the state promoting aviation and flight safety, pilots' rights, and inform the general public on topics related to aviation matters. Between our two organizations, we represent nearly 10,000 members across Colorado, including roughly 1,000 who are your constituents residing in vicinity of the Vance Brand airport.

First, we would like to address the 1/6/25 letter (atch 1) provided to you and your fellow city leaders in your city council meeting packet from "Concerned Longmont Area Citizens" Even though the letter begins by addressing how these fees "...are essential to the airport's economic sustainability..." **make no mistake, their campaign at Longmont and along the entire Front Range is all about diminishing aeronautical activity at area airports.** While these landing fee advocates are correct that the FAA requires airports to be as self-sustaining as possible, landing fees should be a last resort when considering approaches to raise more revenue at the airport since landing fees tend to *diminish* aeronautical activity, decreasing flowage fee revenue, airport self-sustainability, and overall economic benefit to the airport and the community. In any and all cases, any potential imposition of landing fees should always be justified, reasonable, and considered through a transparent process.

Rather than professed concern for airport/city revenue, this group is more likely beating the noise and air pollution drum.

- When it comes to noise, Longmont's own 2024 noise tracking data obtained through Colorado Open Records Act makes it clear that relative to the size of your approximate 98,258-person population, although aircraft noise understandably warrants concern, there were 270 total noise complaints throughout the year.

- Of that number a total of 66 voters were impacted (.067% of the population) -- with an astounding 114 of the 270 complaints being made by a single citizen!
- Other complainants represented during 2024 include one with 17 complaints, another with 11 complaints, another with 10 complaints, and so on meaning that 152 of 270 complaints **(56 percent of the 2024 total) came from just four residents** of Longmont.
- This data is provided not to minimize the fact that these community members are noise sensitive, rather it is to highlight the fact that relative to the entire population of the city, these habitual noise complaining citizens represent a miniscule, even if very vocal minority of the population
- Finally and rather than impose landing fees as a response to appease this very small but vocal minority, consider requesting approval from the FAA to perform a [FAA Part 150 Airport Noise Compatibility Planning](#) study to better assess what the actual noise impacts are as well as enable potential FAA funding of noise mitigation activities such as soundproofing of impacted homes
- When it comes to alleged air pollution from piston aircraft, studies conducted in late 2023 as described in an [AOPA article from February of 2024](#), from both airborne and land based samples near Rocky Mountain Metropolitan Airport in Broomfield were **unable to detect lead** in any of the air or surface sampling locations chosen by surrounding towns that commissioned the testing, other than a single surface contamination sample obtained at a historic local structure believed to be painted (still) with lead-containing paint.

Regarding the proposed establishment of landing fees, the “Concerned Longmont Area Citizens” letter fails to recognize a few things.

- 1) The reason that based aircraft are **generally excluded from landing fees is because they are already (and regularly) contributing to the self-sustainability of the airport through routine fuel purchases, tie down and hangar fees**, as well as hangar property taxes that go back directly to the city
- 2) The reason that even transient light general aviation aircraft are generally exempt from landing fees is that they impose virtually no wear and tear on the airport infrastructure. While there is occasionally debate on where to draw the line in that regard, Federal Aviation Administration (FAA) policy expects no *unjustified* discrimination when airports impose various rates and charges. Since lighter planes cause little negative impacts to airport infrastructure, “discrimination” in this manner is not only justified, but also commonplace.

When it comes to the economic contribution of the airport, the 2025 Colorado Department of Transportation, Aeronautics Division-sponsored economic impact study (atch 2) reflects that Vance Brand airport supports 448 jobs, a \$29.6M payroll, \$46M in total added value, and \$73.6M in total business revenue. While we fully support and understand the necessity to generate revenue to maintain and develop airports as well as the principle of self-sustainability, in our over 86 years of aviation and airport experience, we have seen that landing fees generally cause more problems than they resolve as total airport revenue and economic benefit to the surrounding community diminishes.



Finally, rather than jumping right to landing fees, we recommend considering looking into other forms of airport revenue that will increase, rather than decrease the airport's economic outlook.

Some areas to explore include (but are not limited to) the following:

- Has the airport sponsor (city of Longmont) assessed or studied how the impact of landing fees will impact general aviation, specifically pilots, student pilots, charitable organizations, on-airport businesses, and other businesses or local organizations that make use of the airport?
- Will the revenue from these proposed landing fees be used strictly for airside safety improvements?
- Is the airport sponsor trying to defray costs of specific project, or cover direct costs? If so, what are those costs, and is there a specific timeline and percentage of revenues that will be generated to cover these costs?
- Have all other avenues for revenue generation been investigated?
- Has the airport sponsor inventoried and thoroughly studied available non-aeronautical use land that could potentially be revenue-generating (agricultural leasing, non-aeronautical use business leasing, etc.)?
- Does the airport have a development plan that focuses on long-term sustainability and local funding for the airport, including standardizing and market-rate of leaseholds for on-airport users?
- What revenues are currently generated from on-airport airport users, i.e., fuel flowage rates, gross revenue percentage claim from on-airport business, etc.?
- Are all hangars at capacity for aeronautical use storage, and if not, is there a plan to maximize hangar use or seek approval for non-aeronautical use of facilities? There is currently a nationwide hangar shortage, and hangars are a direct way for airports to generate revenue

A listing of some of the revenue sources to be considered *BEFORE* implementing landing fees include up-to-date fair and reasonable assessments of the rates and charges below:

Tie down fees	Hangar leases	Fuel Flowage Fees	Aircraft Maintenance
Flight Training Schools	Charter Operations	Aircraft Parking Fees	Facility Rentals
Events and Airshows	Advertising / Signage	Concessions	Ground Leases

The main point of the above is to highlight that landing fees should be the absolute *LAST* source of airport revenue considered as the presence of landing fees stifles aeronautical activity, which is antithetical to the mission of the airport which is to foster aeronautical activity while simultaneously maximizing benefit of the airport to the community. Our experience shows us that when landing fees are imposed, the presence of these fees at an airport decrease not only fuel flowage revenue, but the value of hangars on airport property and airport-based businesses,

reducing city tax revenues, more than offsetting the revenue generated by the landing fees. These are the primary reasons why well fewer than 5% of the US approx. 5,200 public use airports in the US have chosen to implement landing fees.

In closing, we the undersigned are seeking your rejection of the arguments posed by the attached letter from “Concerned Longmont Area Citizens” and **urge the Longmont city council to take a different path that focuses on fair and reasonable revenue generation at the airport aligned with FAA Rates and Charges policy that will foster long-term self-sustainability of the airport**. Airports like Stafford in Arizona have tried landing fees for light general aviation—as [this](#) recent AOPA article indicates--only to roll them back. We thank you for your willingness to invest the time and resources to ensure that the city and the airport are in the future not encumbered by the well-documented consequences of imposing landing fees on general aviation airports consisting largely of light general aviation aircraft.

If you and your staff have further questions on this important topic, feel free to contact either of the undersigned.

Sincerely,



Brad Schuster, C.M.
Alaska and Northwest Mountain Region Manager
Aircraft Owners and Pilots Association

///SIGNED///
Adrian Nye, President
Colorado Pilots Association

Atch:

1. 1/6/25 letter included in city council packet from “Concerned Longmont Area Citizens”
2. 2025 Economic Impact Study – Vance Brand airport (LMO)

CC:

Diane Crist, Ward 1 Representative
Susie Hidalgo-Fahring, Ward 3 Representative
Matthew Popkin, Ward 2 Representative
Sean McCoy, At Large Representative
Aren Rodriguez, At Large Representative
Shiquita Yarbrough, At Large Representative
Harold Dominguez, City Manager
Levi Brown, Vance Brand Airport Manager
FAA Airport District Office, Denver
Director, Colorado Department of Transportation-Division of Aeronautics
President, Colorado Airport Operators Association
Director, Rocky Mountain Metropolitan Airport
Director, Northern Colorado Regional Airport
Director, Greeley-Weld County Airport



Director, Erie Municipal Airport
Director, Centennial Airport
Director, Colorado Springs Municipal Airport
Director (acting), Boulder Airport

