



October 16, 2026

VIA ELECTRONIC MAIL:

City of Longmont
ATTN: Mayor Susie Hidalgo-Fahring and City Council
350 Kimbark St.
Longmont, CO 80501

Re: September 29, 2026, Longmont City Council Airport Study Session

Dear Mayor Hidalgo-Fahring and Members of the Longmont City Council:

On behalf of the Aircraft Owners and Pilots Association (AOPA), representing hundreds of thousands worldwide, more than 8,000 members in Colorado and approximately 300 pilots based at or regularly utilizing Vance Brand Airport (LMO), I am writing to share our thoughtful analysis and serious concerns regarding policy guidance discussed and promulgated during the City Council's September 29 study session.

AOPA fully recognizes and respects the City's mandate to address community noise concerns, maintain quality of life, and administer a Voluntary Noise Abatement Program (VNAP) pursuant to Colorado Revised Statutes (C.R.S.) § 43-10-108.5(2)(c). We share the Council's commitment to safety and good-neighbor relations. However, we urge the City to reconsider several proposals—specifically, establishing a three-aircraft traffic pattern threshold, recommending voluntary restrictions on touch-and-go operations based on aircraft count or time of day, and utilizing the airport's Automated Weather Observing System (AWOS) for policy advisories.

As noted in our prior correspondence dated October 10, 2025 (Attachment 1), AOPA Safety Advisor SA-08 does not reflect current AOPA guidance and should not be cited to justify a "saturated pattern" concept. The term "saturated pattern" does not appear in Federal Aviation Administration (FAA) regulations, the Aeronautical Information Manual (AIM), or FAA Advisory Circular 90-66C. While AOPA stands firmly behind its current Noise Awareness Steps (Attachment 2), we respectfully request that going forward, local airport-related policies avoid unestablished classifications or nonstandard operational thresholds.

KEY OPERATIONAL & REGULATORY CONSIDERATIONS

1. Arbitrary Pattern Count Threshold Introduces Operational Ambiguity

The recommendation to discourage touch-and-go operations whenever three or more aircraft enter the traffic pattern lacks support in standard FAA operating procedures. Traffic management in a non-towered environment relies on pilot vigilance, standardized entry procedures, sequence communication, and situational awareness—not arbitrary numerical caps. FAA Advisory Circular 90-66C (Non-Towered Airport Flight Operations) stresses standardized flight paths and collision avoidance without imposing numerical limits.

In practice, forcing pilots to maintain an accurate real-time head count of pattern traffic diverts critical focus away from essential visual scanning, instrument monitoring, and radio coordination. Key practical questions remain unanswered: How is the aircraft count reliably determined by a pilot in flight? How are non-ADS-B aircraft, transient arrivals, instrument practice approaches, or aircraft entering/exiting the pattern accounted for? Without empirical data demonstrating that a three-aircraft threshold improves safety or meaningfully reduces noise, adopting such a policy risks introducing operational uncertainty into standard flight operations.

2. "Voluntary" City-Endorsed Restrictions Carry Practical Operational Risks

While Council members noted that these restrictions are intended as voluntary, official endorsement and publication by the airport sponsor generally lead pilots to perceive them as expected standard procedures, especially among less experienced aviators. For instance, when pilots attempt to adjust flight paths to accommodate nonstandard local advisories—such as extending downwind legs excessively, altering established entry patterns, substituting stop-and-go maneuvers for touch-and-goes, or abruptly departing the pattern—predictability is compromised.

Furthermore, discouraging touch-and-go training during day or night operations at a public-use airport conflicts with broad industry efforts to promote flight safety through continuous proficiency, currency, and stabilized approach practice. Pilot discretion, based on real-time conditions and flight training requirements, remains the most effective tool for safe operations.

3. AWOS Broadcasts Should Remain Dedicated to Essential Weather and Safety Data

Utilizing the Automated Weather Observing System (AWOS) to broadcast local policy preferences or request activity reductions diverges from the system's core regulatory purpose: delivering objective, real-time meteorological and critical safety information. Further, adding non-standard policy messages to AWOS broadcasts can create confusion regarding whether a directive is a regulatory mandate, an FAA advisory, or a local suggestion, in addition to potentially cluttering a vital weather frequency. Repurposing an AWOS for messages outside its intended aeronautical function appears contrary to established FAA expectations for the system and creates potential concerns regarding the use of federally funded airport facilities. At a minimum, such a practice invites scrutiny as to whether the airport remains in compliance with its obligations to operate airport facilities in accordance with FAA standards and grant assurance requirements.

4. Collaborative Engagement with Aviation Stakeholders Ensures Optimal Safety Outcomes

During the study session and particularly when discussing a future airport technical advisory committee makeup, suggestions were made that pilot expertise and FAA technical standards are secondary when framing local initiatives as voluntary. In the context of a federally obligated airport operating within the National Airspace System, active collaboration with local pilots, flight instructors, airport management, and FAA technical representatives is indispensable. Local aviation stakeholders possess the practical operational expertise required to evaluate whether proposed measures genuinely enhance safety and achieve noise abatement goals.

RECOMMENDED CONSTRUCTIVE PATHWAY FORWARD

AOPA remains fully committed to supporting the City of Longmont in developing an effective, legally sound, and collaborative noise abatement framework. We respectfully recommend the following constructive steps:

- **Enhanced Pilot & Flight School Education:** Partner with local flight schools, fixed-base operators (FBOs), and aviation associations to promote AOPA's Noise Awareness Steps and consider enhancing and publishing clear, voluntary noise abatement charts.
- **Community & Stakeholder Liaison:** Establish an Airport Technical Advisory Working Group that includes airport staff, community representatives, flight instructors, and local pilots to co-develop practical noise mitigation solutions.
- **Standardized Noise Abatement Signage:** Install clear, informative signage on the FBO apron and in pilot briefing areas reminding pilots of preferred noise-sensitive corridors and voluntary quiet hours.
- **Formal FAA Coordination:** Coordinate any proposed operational advisories or published airport information with the Denver FAA Airports District Office (ADO), Denver Flight Standards District Office as well as aviation safety consultants to ensure full alignment and compliance with federal guidelines.

CONCLUSION

We appreciate the City Council's dedication to serving the Longmont community and balancing diverse neighborhood and economic interests. AOPA respectfully requests that the Council pause implementation of policies predicated on a three-aircraft pattern cap, voluntary touch-and-go restrictions, and/or AWOS policy broadcasts, and instead initiate a joint stakeholder review. We welcome the opportunity to meet with City leadership, airport management, and community representatives to foster a safe, cooperative, and neighborly environment at Vance Brand Airport.

Respectfully submitted,



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

ATTACHMENTS

1. October 10, 2025, AOPA Letter to Longmont, CO, City Council RE: Saturated Pattern
2. AOPA "Noise Awareness Steps" document

CC:

Diane Crist, Ward 1 Representative

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Alex Kalkhofer, Ward 3 Representative
Matthew Popkin, Ward 2 Representative
Sean McCoy, At Large Representative
Jake Marsing, At Large Representative
Crystal Prieto, At Large Representative
Harold Dominguez, City Manager
Levi Brown, Vance Brand Airport Manager
FAA Airports District Office, Denver
FAA Flight Standards District Office, Denver
FAA Northwest Mountain Region Compliance Office
Director, Colorado Department of Transportation-Division of Aeronautics
President, Colorado Airport Operators Association

APPENDIX A – SELECTED COUNCIL MEMBER STATEMENTS FROM SEPTEMBER 29 STUDY SESSION

The following quotes are included because they help illustrate the rationale expressed by some council members when supporting the proposed actions. They are only presented for context and accuracy and should be evaluated in the context of the complete meeting record.

Councilmember Marsing: “I don't really care what the FAA says about a voluntary policy that we have the authority to enact, and I want to stick to three...”

Councilmember Crist: “...what the FAA also said is three is fine because it's voluntary...”

Councilmember Crist: “As long as it's voluntary, that's what they were looking for.”

Mayor Pro Tem McCoy: “I don't know that the pilots are necessarily the experts on this...”

Mayor Pro Tem McCoy: “these pilots can't seem to fly in the pattern that we've designated for them...”