

April 22, 2008

Linda Bruce  
Federal Aviation Administration  
Denver Airports District Office  
26805 E. 68th Avenue Suite 224  
Denver, CO 80249

RE: Comments on the Centennial Airport Part 150 Study

Dear Ms. Bruce:

Thank you for the opportunity to review and comment on Centennial Airport's Part 150 Noise Compatibility Plan and Noise Exposure Maps. Douglas County is impressed by the work done by the Airport staff and consultant team and looks forward to continued collaboration with the Airport staff. Below is a list of comments specific to the Part 150 Study.

1. During our review of 2001 and earlier reports we expressed disagreement over existing and future number of aircraft operations, percent of night operations and fleet mix. The updated year 2005 values and year 2012 forecast are logical and acceptable for use.
2. Table D5 shows local operations at night by multiengine and turboprop aircraft, but no single engine aircraft. It is unlikely that there is a prohibition on single engine night training; therefore, the reason for zero single engine aircraft local night operations is not clear. The lack of traffic is not representative of flights west of runway 17R-35L, which in the past was disturbing to some residents of Douglas County. The consultant should correct or clarify this.
3. Table D8 shows the percentage of runway utilization during daytime and nighttime. The distribution is logical. Both day and night directional flows for runway 17L-35R are balanced. This indicates discontinuance of the past "preferential runway use" program whereby night arrivals were from the south and night departures were to the south overflying Douglas County. This is in concert with Recommendation 5 on page G16. We are pleased that the procedure is no longer in use. However, the airport management should strive to update all pilot notices of this procedure, since it still appears in current FAA "additional remarks" to pilots in the FAA database (reference AIRNAV April 10, 2008). The Airport should correct pilot guides and the FAA database.

4. Table D9 shows runway utilization by category of aircraft. The table incorrectly shows business jet departures being 40% allocated to runway 35L rather than runway 35R. Fortunately the modeling is correct; therefore the consultant should correct this table.
5. Figure D9 shows flight tracks for jets in a south flow departing over Douglas County. The jets are turning before reaching Lincoln Avenue creating a fan shape rather than a narrow focus. Douglas County made repeated requests in the past for the procedure to be for southern departures on runway 17L to fly runway heading until 4 DME or 8,000 feet altitude with no turns (unless required by Air Traffic Control).

The County's request has not been accommodated as evidenced in Recommendation 6 on page G17 that adds "with a deviation of plus or minus 20 degrees". Turns are not necessary before Lincoln other than for specific cases or single events as dictated by Air Traffic Control. In the past we objected to departure releases to the south with incoming traffic, since those releases must then be turned. Usually the inbound traffic is instrument training which takes second priority to normal operations.

The fan creates overflights outside of the avigation easement that Douglas County required from Meridian. We strongly suggest that the "deviation" be removed from the recommendations and the modeling rerun to show the narrower fan that will result with no turns before Lincoln Avenue.

Corrections to flight tracks and updated modeling of the runway 17L departures should be undertaken before finalizing the noise map in accordance with past Douglas County requests to clarify the departure to be "no turns until reaching 4 DME or 8,000' MSL altitude" rather than continuing the incompatible left or right 20 degree turns.

6. The Existing 2006 Noise Exposure Map is presented as Figure 4 and the Future 2012 Noise Exposure Map as Figure 5. The existing annual operations total is 321,945 and the future is slightly less at 311,765. Tables D8 and D9 show the runway utilization and aircraft distribution by type and time. The assumptions were used for both existing and future. However, visual comparison of the two noise maps appear that the future noise contours to the south get shorter in the future and those to the north get longer. It is not clear why this would happen if the same distributions were used. The consultant should correct or clarify this.
7. The report does not indicate which version of the INM was used for modeling. Upon inquiry Airport Staff said it was version 7.0. This newer update provides an improved result compared to the earlier model. With the lower activity, improved aircraft in use and more accurate model the contours are smaller than those prepared in the early study efforts. The consultant should state the model version.
8. Noise monitoring systems, flight tracking and the complaint hot line should be maintained and improved as new technology evolves to identify and correct improper flight operations that create disturbances or lessen safety in the airport environs.

9. The County requests that the Centennial Airport in cooperation with other reliever airports explore the idea of FAA funding for a feasibility study, and subsequent development of, one or more "remote bounce strips" to provide for necessary visual flight rules touch and go training away from urban areas while relieving controllers and local airspace at these busy airports. Additionally, request the establishment of IFR training "bounce strips" with precision GPS approaches when feasible. The bounce strips would have a minimal runway, partial or full parallel taxiway and minimal apron for training breaks and ground briefings for pilots.

Should you have any questions, don't hesitate to contact me.

Sincerely,



Elizabeth Kay Marchetti  
Senior Planner

CC: Peter Italiano, Director of Community Development  
Betty Allen, Assistant Director of Planning and Zoning Services  
Terence Quinn, Manager of Long-Range Planning