

**GREENWOOD VILLAGE**

April 10, 2008

City Manager's Office

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

Re: Comments by the City of Greenwood Village on Centennial Airport FAR Part 150 Study
Federal Register Notice Number 72 FR 9847

Dear Ms. Bruce:

These comments are submitted on behalf of the Greenwood Village Mayor and City Council.

Statement of Interest in the FAR Part 150 Study

The City of Greenwood Village is a home-rule city incorporated in 1950. Greenwood Village is located in Arapahoe County, Colorado. Development in Greenwood Village consists primarily of residences, commercial office buildings, commercial shopping areas, and schools. Greenwood Village has approximately 14,000 residents but more than 35,000 persons work in Greenwood Village and commute into and out of Greenwood Village each weekday. Many of the Village's 14,000 residents live within the area described as the Airport Influence Area encompassing an estimated 25 square miles in both Arapahoe and adjacent Douglas Counties. Greenwood Village essentially borders Centennial Airport, a general aviation reliever airport, owned by Arapahoe County and operated by the Arapahoe County Public Airport Authority. Greenwood Village is highly affected by noise created by aircraft take-offs and landings.

Statement of the Problem

The issue at Centennial Airport can be summed up in terms of (1) a large increase in airplane traffic when Stapleton International Airport closed and Denver International Airport opened and (2) the flight tracks for airplanes are kept low due to this airport competing with Denver International Airport's Class B airspace. Centennial Airport is the 18th busiest airport and the 3rd busiest general aviation airport in the United States. Over the last decade, service operators,

whose business depends largely on itinerant jet traffic and to some extent the airport, have seen a substantial increase in the jet fuel sales, which is a primary source of income for the Airport. But these increases of traffic have left the citizens of Greenwood Village with an increase in airplane noise.

Summary of Comments

The City of Greenwood Village supports the use of noise abatement and mitigation measures identified in the FAR Part 150 Noise Exposure and Land Use Compatibility Study for Centennial Airport. We view this as a collaborative effort between the Federal Aviation Administration, Arapahoe and Douglas Counties, the cities of Aurora, Foxfield, Greenwood Village, and Lone Tree; the Town of Parker, Unincorporated Arapahoe County neighborhoods, Cherry Creek State Park, Centennial Airport pilot and tenant groups, Tri-County Health, Denver International Airport and several State agencies. Some recommendations benefit the citizens of Greenwood Village more than others. However, because of the collective agreement that noise should not be spread from one community to another, Greenwood Village supports all 12 recommendations.

Recommendation 1-Ban Stage 1 Jets

The action restricts Stage 1 jets from operating at the Airport. The Airport has already taken this action and no Stage 1 jets are based or operate from there. This ban needs to remain in effect and become permanent.

Recommendation 2-Ban Stage 2 Jets at Night

Greenwood Village supports the exclusion of Stage 2 aircraft at Centennial Airport although we realize a FAR Part 161 is necessary to make this a reality. When Congress adopted the phase-out of Stage 2 aircraft at the nation's airports, it limited the phase-out of aircraft weighing more than 75,000 pounds. This law did not affect Centennial Airport. The Airport Noise and Capacity Act (1990) required the FAA to study whether to extend the phase-out of smaller aircraft and the FAA concluded that this was not necessary. Eventually, Stage 2 aircraft would phase out naturally because of the expense involved in operation. Some nine years later, after participating in this study, we know that the total phase-out is still years away. Greenwood Village believes that the exclusion of Stage 2 jets is essential to resolving the noise problems at the Airport. This one recommendation provides the most noise reduction equally throughout our community.

Recommendation 3-Implimentation of a 010-Degree Departure Heading For Jet Aircraft at Night

This heading was tested in the spring of 2001. The purpose of the test was two-fold: 1) could the 010 heading during nighttime hours be successfully flown safely and efficiently and 2) the test was able to measure and quantify the effect of this procedure on noise exposure. Currently, during nighttime hours, many different tracks are used. Aircraft turning west take-off from the north and turn west, aircraft turning east take-off from the north and turn east, and planes taking a northerly route take-off to the north and continue north. The purpose of the a 010 heading is to establish a flight track over open space before turning aircraft over

populated areas north and northwest of the Airport. Pilots would fly a 010-degree heading until a distance of 2 DME is reached before making their turns.

Six sites located north of the Airport were used to house noise monitoring equipment. Three sites were northeast of the Airport in Aurora, one site was north of the Airport in Cherry Creek Park, and two sites were located northwest of the Airport. We feel noise monitors were appropriately placed to get accurate readings from noise sensitive areas. As stated in Report #2002-104 by Barnard Dunkelberg and Company, "The 010-degree departure heading does result in reduction to the high single event noise levels that occur with west-and northbound departure flights. The noise levels east of the airport will increase slightly, but to a level lower than those currently occurring with eastbound departure operations. The single event noise levels in Cherry Creek Park, from westbound operations, would increase slightly with the 010-degree departure heading. However, the single event noise levels from these operations are no greater than the single event noise levels associated with eastbound flights already occurring in the Park."

It is our opinion that the amount of single events probably has diminished as a decrease in the number of Stage 2 aircraft have diminished since this test occurred. However, the relief given to residents in the northwest is still substantial given many Stage 2 aircraft are still flying. Barnard Dunkelberg also stated, "The cumulative DNL noise level analysis shows that the changes to the overall DNL noise levels are relatively small."

Recommendation 4- Test 24 hour Flight Track Fan Between 350 and 010 Degree Headings

This was recommended after the FAA implied a 010-degree heading was not feasible for daytime flights. While we understand the FAA objects to a 010 heading 24 hours a day, a heading between 350 and 010 degrees is a reasonable alternative and should be enacted.

The FAA suggested an alternative which called for jets to depart to the north on a 350 degree heading. While this implied the option is feasible and safe, it is still not desirable to residents of the area. Greenwood Village requests the FAA try headings east of 350-degree heading, such as looking at the effects of 002 or 005 degrees.

The noise contours on Working Paper 4 showed that between the Base Case and Alternative 6 (010 heading), about 12,690 homes were removed from the 60 DNL contour using the 010 heading. While there is no difference between the Base Case and Alternative 9 (350 degree heading) for the 60 DNL, less land and homes are within the 55 DNL. This strongly suggests that something between 350 degree heading and 010 heading would have an incremental benefit to residences.

Recommendation 5- Elimination of Preferential Runway Use

When this was first enacted, there was little development to the south of the airport. Noise data show that a nighttime south departure is generally favored or required more than 60% of the time regardless of whether the preferential runway is in effect. Another 25% of the time a northern departure route is required. Thus, the preferential runway was only an option for a very small percentage of all flights. These facts are borne out by the minuscule differences in the noise contours. Douglas County clearly opposed the continued use of the preferred

runway as development has increased significantly. Centennial Airport voluntarily stopped the preferential runway to the south in 2001. Greenwood Village agreed with that decision.

Recommendation 6- Implement 170 Degree Departure Heading to 4 DNE or 8,000 MSL, Plus or Minus 20 Degrees

Greenwood Village supports this recommendation which benefits our neighbors to the south.

Recommendation 7- Amend Community Plans and Zoning Ordinances

The Airport has supported this recommendation by trying to minimize nearby development. The Airport has been proactive but not always successful in having various communities amend community plans and zoning ordinances. Aurora has set their own land use guidelines, but has allowed variances for residential developments within the Airport's influence zone on Arapahoe and Parker Roads. Arapahoe County did adopt the Airport's land use guidelines but issued a variance for residential development at Dry Creek and I-25. Douglas County has land use guidelines but is not nearly as strict as the Airport's. Parker, Lone Tree and Castle Rock are waiting for the completion of the FAR Part 150 before adopting the Centennial Airport's land use guidelines. The City of Centennial had granted variances to the Airport's land use guidelines near the NW and NE corners of Potomac for a multifamily and single-family residential development. The Airport and Arapahoe County acted quickly and bought a total of 48 acres of this property in an effort to ban future residential development in this location. Greenwood Village required posting and notice for new subdivisions within the flight path. This included a navigation easement on the property deeds and notices to be placed within the sales trailers so it was ensured buyers would be fully aware of the Airport's impact.

Recommendation 8- Update and Establish Environmental/Noise Abatement Liaison Office

The Airport has hired a Noise Abatement officer whose duty it is to deal with the public and work with noise statistics, which are presented to the public at the Citizens Advisory meeting held every other month. These statistics are also posted on the Centennial Airport website. The responsibilities of the Noise Abatement officer will increase with the passage of the FAR Part 150. This person will help to implement the approved Part 150, manage future follow-up studies including a Part 161 study, help select a noise monitoring system, update "Fly Quiet" procedures, work with jurisdictions on land use and zoning regulations, and provide support to the future roundtable committee. We support the Airport's proactive stance in hiring a Noise Abatement officer before the approval of the FAR Part 150.

Recommendation 9- Install Noise Monitoring System and System and Develop Program

Outside of the various flight tracks suggested, having access to a noise monitoring system would greatly help enforcement of the Fly Quiet program at the Airport. This would allow the Airport the ability to see the effectiveness of noise abatement measures as well as enforce them. It could be used to identify aircraft that do not operate within airport policy. It would be our hope that permanent locations would be similar to sites already identified as noise sensitive areas. A permanent system would require FAA grant monies and we hope the FAA will make this a priority.

Recommendation 10- Development/Implementation of Fly Quiet Program

Parts of a Fly Quiet program have been implemented at the Airport. This program has the potential of lowering single event noise levels. This cannot be fully recognized until a noise monitoring system is in place.

Recommendation 11- Operations Review and Part 150 Updates

We concur. This should be done; however, we are past the five-year mark of the study.

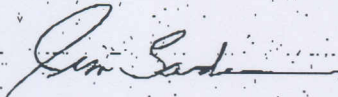
Recommendation 12- Establish Follow-Up Roundtable/Committee

It is our recommendation that a committee made up of community members continue to monitor programs implemented in this Part 150 after its approval.

Concluding Remarks

Both the Airport and the Community and Technical committees, in the development of this study, have expended considerable time and effort. Building of relationships within our community over this very important issue of noise has been valuable. Communication was critical to the end of this process. In Report # 2002-104, Barnard Dunkelberg says, "The results show that there is an overall decrease in noise as a result of the implementation of the Part 150 in nearly all communities around the airport." Later in the report it states, "The cumulative effect of all the recommendations will benefit everyone." Clearly, the Committees have achieved their goal. Therefore, we urge the FAA to take Centennial Airport's FAR Part 150 as a collective body of work benefiting the collective good of our community, which is highly impacted by noise. All recommendations need to be approved. If one is left out, the benefits will not be as great.

Sincerely,



Jim Sanderson
City Manager

c: Mayor and City Council