

**City of Aurora**

Planning Department  
15151 E. Alameda Parkway  
Aurora, Colorado 80012  
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Fax: 303-739-7268  
www.auroragov.org



February 25, 2008

Ms. Linda Bruce, Community Planner  
FAA Denver Airports District  
26805 East 68<sup>th</sup> Avenue, #224  
Denver, Colorado 80249



Dear Ms. Bruce:

**Re: Centennial Airport Noise Compatibility Program Recommendations**

I am writing concerning the Part 150 Study Noise Compatibility Program (NCP) recommendations that were released for public comment on February 22, 2008. Because ongoing airport operations continually affect Aurora residents, the city is concerned about specific recommendations that would route aircraft over Aurora neighborhoods. The city's position on the several recommendations was re-affirmed by Aurora City Council action on January 7, 2008.

**Recommendation 3—Implement 010 Degree Departure Heading for Jet Aircraft at Night**

This departure heading specifically routes the noisiest operations over Aurora neighborhoods during nighttime hours. In addition to potentially affecting Buckley AFB operations, this heading would direct jet departures over sensitive populations. These areas are already exposed to aircraft noise from frequent daytime and nighttime arrival traffic and helicopter overflights. Increasing impacts from the noisiest operations during nighttime hours is unacceptable.

**Recommendation 4—Test 24-Hour Flight Tracks Between 350 and 010 Degree Headings**

The stated objective of this recommendation is to "test the feasibility of spreading the north flow flight tracks over a larger area" during nighttime hours to "...help reduce noise impacts to residents north of the Airport." Aurora will continue to oppose any flight track alteration that has the potential to increase air traffic over our neighborhoods at night.

**Recommendation 5—Elimination of Preferential Runway Use**

Aurora continues to oppose this recommendation. Eliminating the preferential runway has the potential to increase air traffic over Aurora neighborhoods during nighttime hours. It is our understanding that the preferential runway has been implemented infrequently. By implementing the preferential runway, more nighttime air traffic would be routed to the south away from Aurora. We oppose this recommendation and request

Ms. Linda Bruce  
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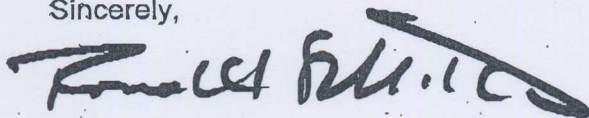
that the Preferential Runway Use be implemented to reduce nighttime aircraft noise over Aurora neighborhoods.

The Aurora neighborhoods that are most impacted by aircraft noise were established more than 40 years before areas south of the airport underwent residential development. In support of Centennial Airport's contribution to the metropolitan area, Aurora has implemented the following:

- A stakeholder role in recommending NCP elements.
- An Airport Influence District zoning ordinance, more protective than Centennial Airport's land compatibility planning program
- A city Airport Noise Coordinator position to assist with residents' complaints and assist the airport in obtaining aviation easements for new development
- Representation at the bimonthly Citizen's Advisory Committee meetings

I have attached Aurora's comments from previous attempts to update the Part 150 Study for reference. Because the NCP recommendations have not changed since 1999 when the original Study was initiated, this letter confirms our previous opposition to specific NCP recommendations.

Sincerely,



Ronald S. Miller  
City Manager

RM/

Attachments:

City of Aurora letter dated May 7, 2002  
City of Aurora letter dated March 17, 2004

cc: Mayor Ed Tauer  
Aurora City Council  
Nancy Freed, Deputy City Manager of Operations

City of Aurora



Ronald S. Miller  
City Manager  
15151 E. Alameda Parkway  
Aurora, Colorado 80012  
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Fax: 303-739-7123  
www.aurora.gov

March 17, 2004

Craig Sparks, Manager  
FAA Denver Airports District  
26805 East 68<sup>th</sup> Avenue, #224  
Denver, CO 80249

Dear Mr. Sparks:

**Re: Centennial Part 150 Study**

I am writing concerning the 2002 Centennial Airport Part 150 Noise Study prepared by the Airport in 2002 to address noise issues associated with aircraft operations at Centennial. Due to its proximity and the impacts of aircraft operations at Centennial Airport on Aurora residents, City staff has been actively involved in the Study from its inception. As part of the Study process, the City has on several occasions submitted comments concerning three of the Study's recommendations (copy of May 7, 2002 letter attached). Our concerns are reiterated as follows:

**Recommendation 3: Implement 010 Degree Departure Heading for Business Jets at Night**

We maintain that implementation of the 010 would result in increased noise impacts to Aurora residents. The response contained in the Part 150 Study states that implementation of this recommendation would not result in more aircraft overflights to Aurora, but does not address the concentration of overflights resultant from adopting the designated 010 routing. While the 010 routing may not increase the total number of overflights, it will concentrate the overflights and associated noise on residents under the 010 flight path. This is unacceptable to the City. Additionally, Buckley AFB also opposes the 010 heading when its airstrip is operational, presently 24 hours a day.

Craig Sparks, Manager  
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March 17, 2004

#### **Recommendation 4: Test 24-Hour Flight Tracks Between 350 and 010 Degree Headings**

Our concern is with the possible noise impacts from the use of the 010 side of the flight tracks. As such, we oppose this recommendation. The response contained in the Part 150 Study states that the recommendation may not be feasible due to airspace conflicts, capacity concerns or actual noise reduction. Nonetheless, the Study also states that the recommendation is worth testing. Therefore, the Study is contradictory regarding the concerns vs. the recommendation to proceed. The recommendation is unacceptable due to the likelihood of increased noise concentrations to Aurora residents under the flight track and the possibility of airspace conflicts. Buckley AFB also opposes use of the 010 during the time period when Buckley's airfield is operational.

#### **Recommendation 5: Eliminate Preferred Runway Use Procedure**

We remain opposed to eliminating the preferential runway system, as it would result in more north departures. The Part 150 Study response concurs with this expected result, but states that increased overflights to Aurora are "not significant." We strongly oppose the rationale behind this recommendation since its only objective is to shift noise impacts currently experienced in the new residential developments south of the airport to established residences north of the airport.

That the Final Part 150 Study and associated appendices maintains a position contrary to our comments and concerns is extremely disappointing. We have consistently maintained that the program being submitted is not appropriate and not consistent with obtaining the objectives for noise compatibility planning under Part 150. It is unacceptable for Aurora residents to be subjected to new and/or increased aircraft noise impacts resultant from recommendations of the Part 150 Study.

Additionally, during a January 6, 2004 conversation between our Planning staff and the FAA Denver District office staff, we were told that FAA Denver District staff were unsure whether the Study would ever be forwarded to Washington and published in the Federal Register, which is the standard procedure in finalizing a Part 150 Study. Any action other than publishing the Study in the Federal Register would eliminate the Study's validity and result in less certainty concerning future operational criteria for the airport and aircraft noise issues. During more recent phone conversations, city staff has been reassured by FAA Denver District staff that the FAA would continue to process the Part 150 Study with the end objective of recordation in the Federal Register. While we fully support this course of action, and as stated above, our objections to the above referenced recommendations are unchanged. The City of Aurora will continue our objections during the 180-day

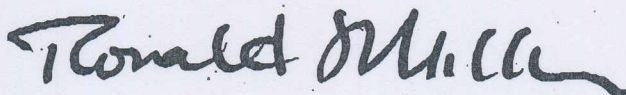
Craig Sparks, Manager

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comment period, which we expect will commence within two to three months from today's date.

Sincerely,

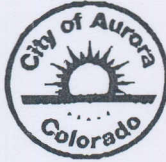


Ronald S. Miller  
City Manager

Attachment: City of Aurora letter dated May 7, 2002

c: Mayor Ed Tauer  
Aurora City Council  
Nancy Freed, Deputy City Manager of Operations

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**RONALD S. MILLER**

May 7, 2002

Mr. Robert P. Olislagers  
Director, Centennial Airport  
7800 South Peoria Street  
Box G-1  
Englewood, Colorado 80112

City Manager  
1470 South Havana Street  
Suite 800  
Aurora, Colorado 80012  
303-739-7010  
FAX: 303-739-7123

Dear Mr. Olislagers:

It is my understanding that you have submitted the Final Part 150 Study and associated appendices to the FAA for consideration of approval for the Noise Compatibility Program. A review of these documents has shown that while our comments have been included, Recommendations 3, 4 and 5 have been retained despite City of Aurora objections.

As you may be aware, 14 C.F.R. 150.23(e)(7) requires that a copy of all written materials submitted to the operator must be included in the program documentation, "together with the operator's response and disposition of these comments and materials to demonstrate the program is feasible and reasonably consistent with obtaining the objectives of airport noise compatibility planning." It is the position of the City of Aurora that neither the Part 150 Study nor the associated appendix contains the required responses to the City's stated positions, specifically regarding Recommendations 3, 4 and 5. The responses to the city's comments contained in the Final Part 150 Study completely fail to meaningfully address these concerns so as to demonstrate that the proposed program is feasible and consistent with the objectives of Airport Noise Compatibility Planning.

In Mayor Tauer's letter to you dated October 11, 2001, he clearly expressed his concerns and opposition to 3 of the 11 Part 150 Study Recommendations. The Mayor's stated concerns, along with the Final Part 150 Study responses, are as follows:

**Recommendation 3      Implement 010 Degree Departure Heading for  
Business Jets at Night**

We maintain that implementation of the 010 would result in increasing noise impacts to Aurora residents. Your response states that implementation of this recommendation would not result in more aircraft overflights to Aurora, but does

**Centennial Final Part 150****Page 2****May 7, 2002**

not address the concentration of overflights resultant from adopting the designated 010 routing. While the 010 routing may not increase the total number of overflights, it will concentrate the overflights and associated noise on residents under the 010 flight path. This is unacceptable to the City. Additionally, Buckley AFB also opposes the 010 heading when its airstrip is operational, presently 24 hours a day.

**Recommendation 4      Test 24-Hour Flight Tracks Between 350 and 010 Degree Headings**

Our concern is with the possible noise impacts from the use of the 010 side of the flight tracks. As such, we oppose this recommendation. Your response states that the recommendation may not be feasible due to airspace conflicts, capacity concerns or actual noise reduction. Nonetheless, your response also states that the recommendation is worth testing. Therefore, your own response is contradictory regarding the concerns vs. the recommendation to proceed. The recommendation is unacceptable due to the likelihood of increased noise concentrations to Aurora residents under the flight track and the possibility of airspace conflicts. Buckley AFB also opposes use of the 010 during the time period when Buckley's airfield is operational.

**Recommendation 5      Eliminate Preferred Runway Use Procedure**

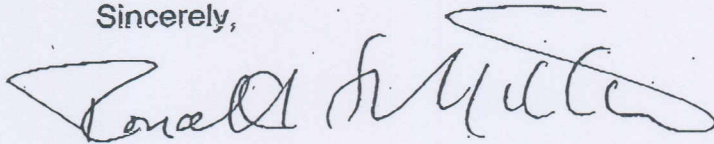
We remain opposed to eliminating the preferential runway system, as it would result in more north departures. Your Part 150 Study response concurs with this expected result, but states that increased overflights to Aurora are "not significant." We strongly oppose the rationale behind this recommendation since its only objective is to shift noise impacts currently experienced in new residential development south of the airport to established residences north of the airport.

The fact that the Final Part 150 Study and associated appendices maintains a position contrary to our comments and concerns is extremely disappointing and indicates to the City of Aurora that the program being submitted is not appropriate and not consistent with obtaining the objectives for noise compatibility planning under Part 150. The City of Aurora therefore, must make a formal objection to the Study, and request that this correspondence be forwarded to the FAA office charged with reviewing the Study. The City will consider what further action needs to be taken to assure that a properly conceived Part 150 Program is considered, rather than the one currently proposed.

**Centennial Final Part 150****Page 3****May 7, 2002**

In conclusion, the City of Aurora already experiences significant noise problems from two other airports, i.e., Denver International Airport and Buckley Air Force Base. While the City of Aurora supports and recognizes the importance of Centennial Airport to the metropolitan region, such support does not extend to proposed amendments to established airport operations that will result in increased aircraft overflights and associated noise impacts to Aurora residents.

Sincerely,



Ron S. Miller  
City Manager

Pet/mo

cc. Mayor and Members of City Council  
Frank Ragan, Deputy City Manager of Operations  
Jim Fels, FAA Denver  
Marty Berry, FAA Denver  
Craig Sparks FAA Denver  
Dennis Ossenkop, FAA

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