

**SUBJECT: PRESENTATION - ROCKY MOUNTAIN METROPOLITAN
AIRPORT (“RMMA”)**

DATE: OCTOBER 21, 2025

PREPARED BY: CITY ATTORNEY KATHLEEN KELLY

**PRESENTED BY: COUNCILMEMBER DIETRICH HOFNER
COUNCILMEMBER JUDI KERN
MICHAEL BUREK, LOUISVILLE RESIDENT**

SUMMARY:

On November 19, 2024 the City Council designated Councilmembers Dietrich Hoefner and Judi Kern to serve as a “Task Force” to work with City Attorney Kathleen Kelly to gather information and explore strategies to address impacts of the Rocky Mountain Metropolitan Airport (“RMMA”) on the City and its residents.

The Task Force has met several times to discuss a two-pronged approach: First, to gather data to evaluate flight patterns and frequencies of take-offs and landings to assess trends; and second, to obtain specialized legal advice regarding the City’s ability to affect changes at the airport that could reduce or mitigate the impacts on residents.

Regarding data gathering, Louisville resident Michael Burek has developed software to review flight activity at RMMA using an academic web site to which he also contributes data. The attached RMMA Air Traffic Study reflects how many planes are taking off and landing, at what altitudes they are flying, and how these numbers have changed over time (what is the trend). Mr. Burek provided similar information to the City Council in 2021.

Regarding the City’s legal ability to affect changes at the airport that could reduce or mitigate the impacts on residents, earlier this year the City Council retained attorney Margaret Martin to provide specialized legal advice. A memorandum outlining her advice, along with an executive summary, is attached.

Mr. Burek will present his data at the City Council meeting and will be available to answer questions regarding the data.

Mr. Burek’s presentation and Ms. Martin’s memorandum and executive summary will all be posted on the City’s website on a page devoted to RMMA, to enable residents and other interested persons to review

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RECOMMENDATION:

City Council to discuss the activities of the Task Force thus far, and provide direction for any next steps. The executive summary from attorney Martin will be posted on the City's web site.

ATTACHMENT(S):

1. RMMA Air Traffic Study by Michael Burek
2. Executive Summary, Aircraft Noise and Aviation Fuel Legal Analysis
3. Memorandum, Aircraft Noise and Aviation Fuel Legal Analysis

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CITY OF LOUISVILLE AIRCRAFT NOISE AND AVIATION FUEL LEGAL ANALYSIS EXECUTIVE SUMMARY

INTRODUCTION

Residents of the City of Louisville (City) have communicated concerns regarding Rocky Mountain Municipal Airport (RMMA) air traffic, particularly regarding aircraft noise and environmental concerns. Aircraft departing and landing at RMMA fly over various points of the City causing noise that disturbs residents and causing environmental concerns from leaded aviation fuel. The City has taken multiple steps to study aircraft noise and engage RMMA to mitigate aircraft noise and environmental concerns, including participating in the now disbanded RMMA Community Roundtable (CNR).

The City requested that we provide an executive summary of legal considerations related to aircraft noise and environmental effects from flights arriving and departing from RMMA. The following executive summary provides an overview of federal aviation law as it relates to aircraft noise and aviation fuel. Following are the key considerations:

- Federal law preempts state and local entities from regulating aircraft operations once those operations are in flight.
- State and local entities that own and operate an airport can take measures in their role as the airport proprietor. These measures are limited, most often involve planning and ensuring compatible land use among other similar measures, and may not restrict access to or use of the airport.
- RMMA has announced they are working to switch to unleaded fuel. Additional federal or state funding may assist RMMA in achieving this transition faster.
- Legal precedent suggests that the City of Louisville would be unlikely to prevail in any attempt to control aircraft operations at RMMA, whether that attempt was of a regulatory nature (such as a City ordinance regarding aircraft activity) or of a legal nature (such as seeking injunctive relief).

FEDERAL LAW CONSIDERATIONS

AIRCRAFT NOISE

The federal government occupies the aviation regulatory space and leaves little room for airport operators and other state and local governments to act. Congress has granted the Federal Aviation Administration exclusive sovereignty over airspace in the U.S. 49 U.S.C. § 40103. The FAA has authority to regulate the areas of airspace use, management and efficiency, air traffic control, safety, navigational facilities, and aircraft noise. Federal preemption leaves airport operators little to no room to regulate or influence aircraft noise or the use of aviation fuel.

The U.S. Supreme Court in a 1973 decision, *Burbank v. Lockheed Air Terminal, Inc.*, found that state and local agencies are preempted from enforcing laws that restrict aviation. In *Burbank*, the Court did acknowledge in a footnote that state or local entities acting “as the proprietor of an airport” may regulate aircraft noise if the regulation is nondiscriminatory. Subsequent cases have defined and limited this authority to regulations that are reasonable, non-arbitrary, and non-discriminatory. The U.S. Supreme Court defined an airport’s proprietor role in *Griggs v. Allegheny County* as decisions related to “where the airport would be built, what runways it would need, their direction and length, and what land and navigation easement would be needed”. Therefore, airport actions to mitigate noise and environmental concerns have

been limited to actions related to their ability to acquire land, ensure compatible land use, and control airport design, scheduling and operations in a reasonable, non-arbitrary, and just way.

Congress has passed multiple pieces of legislation related to airport noise since the 1960s. The legislation has established the FAA's jurisdiction over aircraft noise, required studies to better understand aircraft noise, established noise measurements, created categories of aircraft and restricted the use of noisier aircraft, limited restrictions on certain aircraft, and provided avenues for airport operators to receive funding for noise mitigation measures.

The FAA has historically scrutinized airport restrictions of noise and access challenged through Part 16 complaints. In *Aircraft Owners and Pilots Ass'n v. City of Pompano Beach*, FAA Docket No. 16-04-01, Director's Determination (Dec. 15, 2005) for example, the FAA found the City of Pompano Beach was in violation of its federal obligations because it failed to make the airport accessible to the public on reasonable terms and without unjust discrimination. The City had implemented restrictions on stop-and-go operations, intersection take-offs, touch-and-go operations, taxi-back activity, and prolonged running of aircraft engines. Similarly, the FAA rejected the City of Santa Monica's attempt to restrict the type of aircraft that could land at their facility on preemption grounds and as a violation to their grant assurances. See *City of Santa Monica v. FAA*, 631 F.3d 550 (D.C. Cir. 2011), *aff'g In the Matter of the City of Santa Monica*, FAA Docket No. 16-02-08, Final Agency Decision.

Of note, the City of Superior and Boulder County suit against Jefferson County in the state of Colorado was dismissed on federal preemption grounds on March 28, 2025. See *Town of Superior and Cnty. of Boulder v. Jefferson Cnty.*, No 2024CV30221 (Colo. Dist. Ct. filed Mar. 28, 2025).

AVIATION FUEL

Regarding aviation fuel, the 1970 amendment to the Clean Air Act provides the Environmental Protection Agency (EPA) and FAA the authority to set aircraft emission standards. The act expressly preempts states from imposing stricter emissions standards than the federal government.

The FAA and industry formed the Eliminate Aviation Gasoline Lead Emissions (EAGLE) program in February 2022 to work toward a lead-free aviation system by no later than 2030. In partnership with EAGLE, the FAA is working to obtain the FAA authorization for new fuels through fleet authorization and aircraft certification processes. The fleet authorization process was created in response to the FAA Reauthorization Act of 2018, and will result in qualified unleaded fuel candidates authorized for use in aircraft. Additionally, the FAA will require that specific engine and aircraft models meet specific minimum standards as part of the supplemental type certification (STC) process.

STATE INITIATIVES

In 2024, the State of Colorado enacted the Reduce Aviation Impacts on Communities law that encourages state general aviation airports, like RMMA, to transition to unleaded aviation fuel. CO HB 24-1235. The law provides an income tax credit to aircraft owners that transition to unleaded fuel, guarantees funding for airports to transition to unleaded aviation gasoline, and requires some airports to adopt a plan to phase out the sale of leaded gasoline by 2030. Additionally, the state subjects aviation gas and jet fuel to a tax. Section 39-27-102(1)(a)(IV), C.R.S.

RMMA OPTIONS

A state or local entity acting as an airport operator may carry out its proprietary powers and rights to operate the airport. 49 U.S.C. § 41713(b)(3). These powers include their ability to select an airport site, acquire land, assure compatible land use, and control airport design. FAA Order 5190.6b. RMMA has an opportunity to use these powers as it works to expand the airport's capacity. The airport was recently awarded a grant to construct a new taxiway and refurbish and expand an existing one. In preparing for this

development to expand capacity, RMMA could consider how its design can facilitate noise and environmentally friendly operations. Further, with an understanding that noise will increase with additional operations, RMMA can consider working with local partners to modify compatible land use zoning and potentially acquire land as necessary. However, these are expensive options as the airport and the communities are already established and in place, and communities have multiple residences that are affected.

CITY OF LOUISVILLE OPTIONS

The City has no legal ability to directly regulate RMMA or the operation of aircraft. As addressed earlier in this memo, courts have consistently held that only the airport proprietor has a (limited) ability to regulate aircraft operations. Furthermore, from a practical perspective, even if the City were to decide to implement a noise ordinance attempting to control aircraft within the City's airspace, it would be incredibly unlikely that any pilot or aircraft owner would recognize or accede to the City's attempt to regulate, essentially rendering the regulation ineffective. Finally, it is highly likely that any attempt by the City to regulate aircraft operations would result in prompt challenges to those regulations or ordinances, which could result in costly litigation by the City if it were to defend those regulations.

The strongest action the City can take on behalf of its residents is continued engagement with RMMA and Jefferson County. This may come in the form of direct engagement, participation in meetings, or joining focus groups like the now disbanded CNR.

RESIDENT OPTIONS

Residents of the City of Louisville may consider several options to further engage regarding airport noise. First, residents should use airport noise reporting mechanisms that RMMA and the FAA have established. Reporting noise complaints creates documentation of the issues and may help airport and FAA leaders in developing a solution. Second, residents may consider engaging businesses that use the airport in a grassroots manner. These businesses, like flight schools, rely on the surrounding communities for their businesses to succeed. They may be willing to hear the views of the residents and adjust practices. Third, residents can advocate to their state and federal representatives. Both the state and federal governments have provided funding to help mitigate environmental concerns from aviation fuel. These representatives may be willing to push for more funding or policy changes that may positively affect aircraft noise and environmental effects. Fourth, community members may use FAA's informal or formal complaint procedures if they believe the airport is not in compliance with one of its federal obligations. Title 49 Part 13 and Part 16, respectively, provide for informal and formal complaint processes where an airport is non-compliant with their federal obligations.

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To: City of Louisville
From: Margaret Martin and Sean Cusson, Thompson Burton PLLC
Date: May 7, 2025
RE: RMMA Aircraft Noise and Pollution Considerations for the City of Louisville

The following report provides considerations for the City of Louisville (City) regarding how aircraft noise and aircraft environmental effects are regulated and options available to the City to address related concerns. Further, we have specified options that the Rocky Mountain Metropolitan Airport (RMMA) may use to mitigate noise and pollution effects. Finally, we have created an executive summary of this report to educate City residents on the legal considerations related to aircraft noise and pollution.

ISSUES

- Whether the City has direct authority to manage aircraft noise and environmental effects caused by flights departing and arriving from RMMA?
- Whether the City can take other measures to affect law and policy related to noise and environmental effects caused by flights departing and arriving from RMMA?

OPPORTUNITIES FOR CITY OF LOUISVILLE ENGAGEMENT

Legal precedent suggests that the City of Louisville would be unlikely to prevail in any attempt to control aircraft operations at RMMA, whether that attempt was of a regulatory nature (such as a City ordinance regarding aircraft activity) or of a legal nature (such as seeking injunctive relief). Other opportunities for City engagement consist of:

- Participating in airport noise groups and studies led by RMMA for their current noise study and any future noise studies and participating in the NEPA process for the proposed RMMA runway expansion.
- Advocating to the State of Colorado in support of additional funding for the transition to unleaded fuel at RMMA.

BACKGROUND

Residents of the City have communicated concerns regarding RMMA air traffic, particularly regarding aircraft noise and environmental concerns from leaded aviation fuel.

The City's southern boundary is approximately one and a half miles to the northwest of RMMA's northwest property boundary.

RMMA is a reliever airport for Denver International Airport, has a large general aviation population, and has multiple flight schools. In 2022, the airport had over 260,000 operations. The Federal Aviation

Administration (FAA) projects the airport will continue to grow through 2050.¹

In 2019, the City joined the City of Superior's study of aircraft noise resulting from aircraft taking off from and landing at RMMA. The study resulted in recommendations that can be summarized in the following areas: flight procedures, practices, and policies; community outreach and engagement; industry outreach and engagement; land-use planning and development; and regional collaboration.²

RMMA published its Fly Quiet Program, voluntary noise abatement procedures, in 2019. The procedures were amended in 2023 to provide recommendations regarding nighttime flight patterns. The Fly Quiet Program's Friendly Flying Measures are a voluntary agreement for aircraft users of RMMA. The airport has published this information on its website and has created a pamphlet to educate aircraft operators. RMMA's Annual Noise Reports from 2019 through 2022 show an increase in noise complaints coinciding with increased operations.³ The noise reports do not show a positive correlation between the voluntary noise abatement program and a reduction in noise complaints.

The RMMA Community Noise Roundtable (CNR) was formed in 2021 and consisted of eight local government jurisdictions in the surrounding areas. The CNR was created to address community concerns regarding increasing noise from aircraft operations. The CNR worked with a contractor to identify Visual Flight Rules (VFR) to mitigate noise. The contractor identified departure and arrival routes for RMMA aircraft operations to use for travel to and from the typically used flight practice areas in the region. Many of the flight practice areas in the region are located 10 nautical miles north of RMMA and are most often used by operators flying out of RMMA. The contractor collaborated with the FAA in developing these measures to ensure the agency supported the plan. The contractor presented its VFR recommendations to the CNR in March 2024. The final plans were never presented to the FAA and no work was done to implement them.

In April 2024, a majority of the CNR members voted to terminate the Intergovernmental Agreement that formed the CNR. The City supported disbanding the CNR and had planned to rescind its membership if the CNR continued.⁴

In 2023, the Colorado Court of Appeals affirmed a 2022 ruling that RMMA exceeded the proposed future noise contour levels established by the 1988 Master Plan "by the sustained operation of aircraft as shown by the [c]ontours provided in the 2000 Master Plan".⁵ This was based off a suit brought by the Rock Creek Master Homeowners Association, Inc. (HOA) against Jefferson County where the HOA claimed that RMMA violated certain aviation easements granted to it that encumbered residential property in the Rock

¹ Memorandum from Jason Stoddard and Eugene Reindel, HMMH, to RMMA Community Noise Roundtable (March 7, 2024), <https://www.jeffco.us/DocumentCenter/View/42606/HMMH-Project-Recap-and-Presentation?bidId=>. (Hereinafter, HMMH Memorandum)

² Report from ABXx2.com to Jefferson County (September 2019), <https://www.jeffco.us/DocumentCenter/View/27457/SuperiorLouisville-Airport-Noise-Study-Strategy-Recommendations?bidId=>.

³ RMMA published annual noise reports from 2014 through 2022. Annual noise reports for 2023 and 2024 were not found. RMMA noise reports for 2014 through 2022 may be found at: <https://www.jeffco.us/Archive.aspx?AMID=44>.

⁴ Recording of May RMMA Community Noise Roundtable Meetings (May 2, 2024) <https://www.jeffco.us/4235/CNR-Meetings>.

⁵ Staff, *Rock Creek HOA secures a win in lawsuit against RMMA*, Northglenn Thornton Sentinel (May, 19, 2022), <https://coloradocommunitymedia.com/2022/05/19/rock-creek-hoa-finds-a-win-in-lawsuit-against-rmma/>, (quoting *Rock Creek Master Homeowners Ass'n, Inc. v. Jefferson Cnty.*, 22CA0602).

Creek neighborhood.⁶ Of the twenty-nine easements the plaintiffs claimed RMMA violated, the court terminated nine of them.

In December 2023, Boulder County homeowners filed a lawsuit in state court against Jefferson County claiming inverse condemnation and seeking compensation for being “substantially deprived of the use and enjoyment of their homes and properties” due to the noise from operations at RMMA.⁷ The homeowners asserted three specific claims for relief: (i) RMMA has no right to use the airspace over the Rock Creek neighborhood pursuant to the June 2023 ruling affirming the termination of the nine aviation easements, thus their sustained and increased use thereof constituted a taking of an aviation easement⁸; (ii) RMMA’s use of the airspace constituted a taking without just compensation in the form of a physical invasion and occupation of their property due to the lead fuel particulates falling from the aircraft vibrations caused by aircraft noise⁹; and (iii) RMMA’s use of the airspace has caused physical harm to the residents due to the constant exposure to noise and to their properties resulting in their diminution in value.¹⁰ As of the date of this memorandum, the Court has not issued a ruling in this case.

In March 2024, the Town of Superior and Boulder County filed a lawsuit in state court against the RMMA Airport Director and Jefferson County seeking injunctive relief to abate the public nuisance caused by piston-engine aircraft performing touch and go operations at RMMA, alleging that unsafe levels of lead particulates and excessive aircraft noise create health and safety hazards for the residents. The Defendants removed the case to federal court and the case was remanded back to state court in October 2024. The Defendants filed a motion to dismiss in December 2024, and on March 28, 2025, the court dismissed the case on federal preemption grounds.¹¹

In 2024, the State of Colorado enacted House Bill 1235, seeking to mitigate environmental and noise impacts of aviation for communities in Colorado. The legislation incentivizes the transition from leaded to unleaded gasoline, requires airports to adopt plans to phase out leaded aviation gasoline by 2030, mandates airports create noise abatement plans in coordination with flight schools and pilots, and includes community representation on the Colorado Aeronautical Board.¹²

In October 2023, RMMA announced its intention to transition to unleaded aviation fuel.¹³ RMMA is pursuing a Federal Bipartisan Infrastructure Law (BIL) grant for the installation of a new tank for unleaded fuel.¹⁴ RMMA is also working to identify a new fuel supply for the new tank. The airport states it has targeted July 2025 to begin this project dependent upon grant funding.

RMMA has received a grant from the Colorado Department of Transportation of \$300,000 to cover the difference in costs per gallon of the current fuel for sale at RMMA and the new fuel provided at the airport. The grant will cover up to \$2.00 per gallon difference between RMMA’s current fuel and the new fuel. The new fuels under consideration are GAMI 100UL and Swift Fuels UL94 and 100R. The airport is working with the airport users to determine which new fuel best meets their needs.

⁶ Compl. and Jury Demand at ¶53, *Fuller v. Jefferson County*, No. 2023CV31075 (Colo. Dist. Ct. filed Dec. 21, 2023) (hereinafter *Fuller v. Jefferson County*).

⁷ *Id.* at ¶5.

⁸ *Fuller v. Jefferson County* at ¶97–101.

⁹ *Id.* at ¶112–15.

¹⁰ *Id.* at ¶131.

¹¹ See *Town of Superior and Cnty. of Boulder v. Jefferson Cnty.*, No 2024CV30221 (Colo. Dist. Ct. filed Mar. 28, 2025)

¹² Colorado-2024-HB1235.

¹³ ABC News Denver Coverage of Rocky Mountain Metropolitan Airport Elimination of Leaded Fuel Press Conference (Oct. 4, 2023) <https://www.youtube.com/watch?v=6YdtMj2XiPI>.

¹⁴ Jefferson County, <https://www.jeffco.us/faq.aspx?qid=1436>.

RMMA was awarded two federal grants in 2024. One grant of \$5,498,829 is for the construction of a new taxiway and to improve an existing taxiway. A second of \$1,400,633 is for the RMMA to conduct a noise compatibility study.¹⁵

On March 25, 2025, a Board of County Commissioners Briefing Paper was released regarding supplemental budget appropriations and focus group assignments for RMMA's Part 150 Noise Study.¹⁶ The briefing paper notes that the airport briefed the Board of County Commissioners on February 25, 2025, regarding the use of focus groups to encourage broad participation from interested community members. The airport has worked with a consultant, created a Part 150 Scope of Work, determined the cost for the change order, and developed a plan to establish each focus group. The airport is planning on having three user groups, including the airport users focus group and community members focus group each with eight members, and a relevant county and city planning and zoning staff focus group with six members.

The City is included in RMMA's Focus Group list of participants but not in the Community Focus Group. The Community Focus Group membership will be determined based on pre-defined zones that the airport believes may be affected by a 65 DNL contour. Community members from the City can request to participate on the focus group. RMMA projects it will solicit focus group participation between April 3 and April 20, 2025 and begin meetings on June 12, 2025.

FEDERAL LAW CONSIDERATIONS

To assess potential actions or remedies available to the City to address aircraft noise and pollution concerns, the City must understand how aircraft and airports are regulated. This includes understanding the rights, responsibilities, and scope of authority of the federal government, airport operators, and surrounding communities.

CONSTITUTIONAL CONSIDERATIONS

SUPREMACY CLAUSE

The federal government occupies the aviation regulatory space and leaves little room for airport operators and other state or local governments to act. Congress has granted the FAA exclusive sovereignty over airspace in the U.S.¹⁷ The FAA has the authority to regulate the areas of airspace use, management and efficiency, air traffic control, safety, navigational facilities, and aircraft noise.¹⁸ A state or local entity acting as an airport operator may carry out its proprietary powers and rights to operate the airport.¹⁹

State and local agencies are preempted from enforcing laws that restrict aviation.²⁰ In *Burbank v. Lockheed Air Terminal Inc.*, the Supreme Court found that the pervasive nature of federal aircraft noise regulation establishes federal preemption over state and local agencies' police powers.²¹ Further, the Supreme Court

¹⁵ Press Release from Senator Hickenlooper (January 14, 2025) (available at https://www.hickenlooper.senate.gov/press_releases/hickenlooper-bennet-celebrate-over-20-million-in-additional-federal-funding-to-improve-colorado-airports/).

¹⁶ See Board of County Commissioners Briefing Paper, Topic: Part 150 Noise Study Focus Group Participation (March 25, 2025) available at <https://pub-jeffco.escribemeetings.com/filestream.ashx?DocumentId=10504>.

¹⁷ 49 U.S.C. § 40103.

¹⁸ 49 U.S.C. §§ 40103, 44502, and 44701- 44735.

¹⁹ 49 U.S.C. § 41713(b)(3)

²⁰ The Supremacy Clause of the Constitution establishes that state and local laws may not override or interfere with federal law. U.S. Const. art. VI, cl. 2.

²¹ *Burbank v. Lockheed Air Terminal, Inc.*, 411 U.S. 624, 633-34, 93 (1973) (hereinafter *Burbank*) (citing *Rice v. Sante Fe Elevator Corp.*, 31 U.S. 218, 230 (1947), “[t]he scheme of federal regulation may be so pervasive as to make reasonable the inference that Congress left no room for the States to supplement it...” and (citing *Northwest*

pointed to the legislative history where members of Congress argued that state and local entities cannot regulate aircraft noise.²²

Burbank involved the enforcement of a City Council of Burbank, California, ordinance that prevented certain aircraft from taking off from Hollywood-Burbank Airport between specific times and restricted the airport operator from permitting these aircraft to take off during those periods. Hollywood-Burbank Airport, at the time of the 1973 case, was a privately owned airport.²³ Because the city was not the airport proprietor, the Court upheld the lower courts' decisions that the ordinance was unconstitutional under the Supremacy Clause.²⁴ On this basis alone a court will likely deem any City of Louisville regulation of aircraft to reduce noise or environmental concerns within its city boundaries preempted by federal law, since the City of Louisville is not the airport proprietor.

The Court in *Burbank* acknowledged in a footnote that state or local entities acting "as the proprietor of an airport" may regulate aircraft noise if the regulation is nondiscriminatory.²⁵ Subsequent cases have established that airport operator regulations "must be reasonable, non-arbitrary, and non-discriminatory".²⁶ An airport operator's role as a proprietor provides authorities related to their duties as a planner, developer, and property manager. In *Griggs v. Allegheny County*, the Supreme Court explored the authorities of an airport operator where the Court reviewed an unconstitutional taking claim related to aircraft noise.²⁷ The Court found the airport authority responsible for the taking because they decided "where the airport would be built, what runways it would need, their direction and length, and what land and navigation easements would be needed".²⁸

FAA guidance acknowledges that airport operator powers and authority to control aircraft noise include "the power to select an airport site, acquire land, assure compatible land use, and control airport design, scheduling and operations" while noting the limitations of unreasonableness, arbitrariness, unjust discrimination, and interstate commerce.²⁹ However, federal preemption has applied where airports have tried to restrict land use runways, taxiways, and runway safety areas.³⁰ Therefore, RMMA actions that restrict access to or use of existing runways will potentially be preempted if challenged by airport users or the FAA.

RMMA, as the proprietor of the airport, can consider measures affecting aircraft noise that are consistent with its duties as the planner, developer, and property manager. Some measures may help reduce noise within the immediate vicinity of the airport, such as putting up sound barriers or restricting engine-run-up practices in certain areas. Off-airport measure often involve more expensive solutions such as acquiring land, ensuring compatible land use, or installing sound proofing at affected buildings. Often, as is discussed further below, the FAA will find any further measures to restrict aircraft activity unreasonable, arbitrary, or unjustly discriminatory.

Airlines, Inc. v. Minnesota, 322 U.S. 292, 303 (1944), in finding "Congress has recognized the national responsibility for regulating air commerce" the Court stated "[f]ederal control is intensive and exclusive.").

²² *Burbank*, at 634-37.

²³ *Burbank*, at 651.

²⁴ *Id.* at 626.

²⁵ *Id.* at 635 Fn. 14.

²⁶ *British Airways Board v. The Port Authority of New York and New Jersey (Concorde I)*, 558 F.2d 75, 82 (2d Cir. 1977).

²⁷ See *Griggs v. Allegheny Cnty.*, 369 U.S. 84, 89, 82 S. Ct. 531, 534 (1962).

²⁸ *Id.* at 89.

²⁹ FAA Order 5190.6B

³⁰ *Burbank-Glendale-Pasadena Airport Auth. v. City of Los Angeles*, 979 F.2d 1338 (9th Cir. 1992), and *Tweed-New Haven Airport Auth. v. Tong*, 930 F.3d 65 (2d Cir. 2019).

COMMERCE CLAUSE

The Commerce Clause provides Congress the power to regulate matters that effect interstate commerce while limiting state and local regulatory authority.³¹ State or local regulation cannot discriminate against or unduly burden interstate commerce.³² State or local regulations must be reasonable, even-handed in achieving a legitimate public interest, and impose incidental effects on interstate commerce.³³ In *NBAA v. Naples*, the court found the dormant commerce clause was not implicated where the city acted within its proprietor's exception under 49 U.S.C. § 41713(b)(3) and followed the processes established by the Airport Noise and Capacity Act of 1990 (ANCA), discussed further below, to ban Stage 2 aircraft.³⁴

In developing restrictions that do not restrict access or unjustly discriminate, RMMA must also consider effects of the restrictions on interstate commerce based on the existing or potential operations at RMMA. RMMA does have interstate operations, and while it does not appear that those interstate operations are the primary source of noise complaints, any airport restriction or regulation may be subject to a commerce clause analysis if challenged.

AIRPORT NOISE CONGRESSIONAL AND REGULATORY ACTION

Congress has passed multiple pieces of legislation related to airport noise since the 1960s. The legislation has established the FAA's jurisdiction over aircraft noise, required studies to better understand aircraft noise, established noise measurements, created categories of aircraft and restricted the use of noisier aircraft, limited restrictions on certain aircraft, and provided avenues for airport operators to receive funding for noise mitigation measures.³⁵ For our discussion here, we will address legislative and regulatory activities related to grant assurances, measuring airport noise and the airport noise compatibility program, the national noise program and review of airport programs, and the most recent requirement of the FAA to study aircraft noise and update regulations.

GRANT ASSURANCES

An airport operator that accepts federal funding must comply with federal Grant Assurances pertaining to the operation and use of their airport.³⁶ Grant Assurances include requirements to comply with the Airport Noise Compatibility Planning regulations in Part 150, further discussed later in this report, and Grant Assurance 22, Economic Nondiscrimination. Grant Assurance 22, among other obligations, requires that the airport remain available for public use on reasonable conditions and without unjust discrimination.³⁷ The majority of the Grant Assurances remain in effect through the useful life of the facility improved by the project. This timeframe is limited to 20 years for public owned airports, unless the specific grant or Grant Assurance specifies otherwise.³⁸ There is no limit on the duration of effect of the Grant Assurances with respect to real property acquired with federal funds.

The Grant Assurance process provides the FAA oversight authority over airport grant recipients as they try

³¹ *Fulton Corp. v. Faulkner*, 516 U.S. 325, 330 (1996).

³² *General Motors Corp. v. Tracy*, 519 U.S. 278, (1997).

³³ *Nat'l Bus. Aviation Ass'n v. City of Naples Airport Auth.*, 162 F. Supp. 2d 1343, 1349 (M.D. Fla. 2001) (citing *Pike v. Bruce Church, Inc.*, 397 U.S. 137, 142 (1970)).

³⁴ *Id.* at 1354.

³⁵ ACRP Report 15, *Aircraft Noise: A Toolkit for Managing Community Expectations*, provides a comprehensive list of legislation and regulations related to aircraft and airport noise. Woodward, et al., ACRP Report 15, *Aircraft Noise: A Toolkit for Managing Community Expectations*, 2009, ch. 6. Transportation Research Board.

³⁶ 49 U.S.C. §§ 47101 – 47123 (conditioning the receipt of FAA grant funding on compliance with Grant Assurances.).

³⁷ 49 U.S.C. § 47107(a)(1) *et seq.*

³⁸ Sean Cusson and Margaret Martin, *Accommodating Federal Agencies at Airports and Related Contractual Concerns*, TRANSPORTATION RESEARCH BOARD AIRPORT COOPERATIVE RESEARCH PROGRAM (2025).

to implement or enforce airport noise restrictions. The FAA, through Part 150, reviews proposed noise restrictions and, through 49 C.F.R. Parts 13 and 16, reviews complaints related to federal obligation and condition compliance to include availability for public use and without unjust discrimination.

Title 49 Parts 13 and 16 provide informal and formal administrative compliance review processes for the FAA to investigate and remediate claims of airport obligation noncompliance. Anyone can file a Part 13 complaint regarding an alleged airport violation of its statutory, safety, and regulatory obligations. The FAA will investigate the Part 13 complaint locally and work with the airport on voluntary compliance solutions. If the airport fails to comply, the FAA will initiate an enforcement action.

Part 16 enumerates the FAA's formal complaint process. A party filing a Part 16 complaint must be substantially affected by the airport's alleged noncompliance with a federal obligation. Reviews of the complaint will be completed by FAA Headquarters. The FAA may issue an order that terminates eligibility for grants, suspends payment of grant funding, withholds approval of any passenger facility charge application, issue a cease-and-desist order, direct the refunding of unlawfully collected fees, and other compliance orders.³⁹

The FAA has historically scrutinized airport restrictions of noise and access challenged through Part 16 complaints. In *Aircraft Owners and Pilots Ass'n v. City of Pompano Beach*, FAA Docket No. 16-04-01, Director's Determination (Dec. 15, 2005) for example, the FAA found the City of Pompano Beach was in violation of its federal obligations because it failed to make the airport accessible to the public on reasonable terms and without unjust discrimination. The City had implemented restrictions on stop-and-go operations, intersection take-offs, touch-and-go operations, taxi-back activity, and prolonged running of aircraft engines.⁴⁰ Similarly, the FAA rejected the City of Santa Monica's attempt to restrict the type of aircraft that could land at their facility on preemption grounds and as a violation to their grant assurances.⁴¹ Additionally, the FAA, through the discretionary nature of federal funding, can ensure compliance with Grant Assurances by withholding additional federal funding for airports that the FAA believes are not complying with the grant assurances. Through these processes the FAA has limited the types of restrictions an airport can implement to address aircraft noise.

The RMMA most recently reported receiving two federal grants in 2024. One grant for \$5,498,829 to construct a new taxiway and improve an existing taxiway. A second of \$1,400,633 is for the RMMA to conduct a noise compatibility study. The noise compatibility study is discussed further below.

MEASURING AIRPORT NOISE AND AIRPORT NOISE COMPATIBILITY PROGRAM

The 1979 Aviation Safety and Noise Abatement Act (ANSA) and subsequent FAA rulemaking established the noise measurement level and voluntary process for an airport operator to evaluate noise effects from operations at their airport.⁴² ANSA required the FAA to establish a single system of measuring noise and determining noise exposure resulting from airport operations, the noise and noise exposure impacts on individuals, and identify land uses that are incompatible with various noise exposures.⁴³ The FAA promulgated 49 C.F.R. Part 150 to implement ANSA.⁴⁴

³⁹ 14 C.F.R. Part 16.

⁴⁰ *Aircraft Owners and Pilots Ass'n v. City of Pompano Beach*, FAA Docket No. 16-04-01, Director's Determination (Dec. 15, 2005).

⁴¹ See *City of Santa Monica v. FAA*, 631 F.3d 550 (D.C. Cir. 2011), *aff'g In the Matter of the City of Santa Monica*, FAA Docket No. 16-02-08, Final Agency Decision.

⁴² 49 U.S.C. § 2101 et seq.

⁴³ *Id.*

⁴⁴ 49 FR 49260, December 18, 1984 (amending and making final the interim regulations promulgated January 19, 1981 (46 FR 8316, January 26, 1981)).

An airport operator can voluntarily participate in the FAA’s airport noise compatibility program under Part 150. The regulation establishes standards for an airport operator to document noise exposure and identify mitigation measures to reduce or prevent incompatible land uses. Part 150 guides an airport participant in analyzing noise exposure. In reviewing an airports compliance with Part 150 the FAA “must evaluate whether the restriction places an undue burden on interstate or foreign commerce or the national aviation system, and whether the restriction affects the sponsor’s ability to meet its federal obligations”.⁴⁵

Part 150 creates the noise metric known as the day-night average sound level (DNL) that measures noise levels over a 24-hour period. The rule establishes 65 decibels (dB) as the “significance threshold” of noise effects on the ground and to determine whether residential land uses are compatible with operations at a nearby airport. The DNL adds a 10 dB downward adjustment for evening hours to accommodate the more sensitive time for loud noise.

Airports that choose to participate in the Part 150 noise compatibility program will need to first submit a noise exposure map and a subsequent noise exposure plan. The noise exposure map depicts current and projected noise exposures at the airport and in surrounding areas using noise “contours”, like a boundary. For example, a map may depict noise contours at the 65 dB, 70 dB, and 75 dB levels at the airport and at other off-airport noise-impacted areas. The map is then used to identify areas of incompatible land use and is used to identify and propose noise mitigation projects for FAA review and approval.⁴⁶

The FAA requires airport operators working on a noise compatibility program to consider operational and land-use mitigation measures. Operational mitigation measures can include voluntary recommendations directing air traffic over less populated areas and reducing aircraft engine run-up noise. Land-use mitigation measures may include acquiring land, constructing noise barriers, or providing insulation.⁴⁷ These mitigation measures are not a required result of a Part 150 study, and may not be approved by the FAA. Further, there is very little available federal funding for mitigation measures such as land acquisition, construction of noise barriers, or soundproofing.

RMMA has started a Part 150 noise compatibility study as part of its 2024 grant to create a noise compatibility plan. The City should engage with RMMA as it creates its noise exposure map and analyzes noise impacts to ensure the City’s issues are properly documented and considered in the Part 150 process. Additionally, the City should consider participating on the Planner Focus Group and having a representative appointed to the Community Focus Group.

NATIONAL NOISE PROGRAM AND REVIEW OF AIRPORT RESTRICTIONS

Congress passed ANCA in 1990 establishing a national program to review airport noise and access restrictions.⁴⁸ The law codifies the relationship between noise management and airport capacity and the challenge of uncoordinated and inconsistent restrictions across the air transportation system in requiring the management of noise policy at a national level.⁴⁹ ANCA provides state and local airport proprietors a carve out from federal Supremacy over airspace regulation.

The FAA implemented ANCA through 14 C.F.R. Part 161, Notice and Approval of Airport Noise Access Restrictions. Part 161 requires that review and approval procedures be completed before an airport may

⁴⁵ FAA Order 5190.6b at 13.6.

⁴⁶ Rachel Tang, *Federal Airport Noise Regulations and Program*, CONGRESSIONAL RESEARCH SERVICE (Sept. 27, 2021) (Hereinafter CRS Airport Noise).

⁴⁷ *Id.*

⁴⁸ The law also phases out of certain larger Stage 2 aircraft and grandfathered in certain regulations of Stage 2 and Stage 3 aircraft in place before October 1, 1990. 49 U.S.C. 47521.

⁴⁹ 49 U.S.C 47521.

impose restrictions on Stage 2 or Stage 3 aircraft.⁵⁰ The FAA recommends using Part 150 studies to fulfill the notice and comment requirements of Part 161.⁵¹

Restrictions on Stage 3 aircraft require an agreement by the airport and all airport users or notice and comment processes and an analysis of the restrictions by the FAA.⁵² The FAA will consider environmental impacts and compliance with grant assurances and Surplus Property Act obligations.⁵³ The FAA's review will analyze the following six statutory criteria:⁵⁴

- The proposed restriction is reasonable, nonarbitrary, and nondiscriminatory.
- The proposed restriction does not create an undue burden on interstate or foreign commerce.
- The proposed restriction maintains safe and efficient use of navigable airspace.
- The proposed restriction does not conflict with any existing federal statute or regulation.
- The applicant has provided adequate opportunity for public comment on the proposed restriction.
- The proposed restriction does not create an undue burden on the national aviation system.

Airports have not been successful in receiving FAA approval for ANCA Stage 3 restrictions.⁵⁵ The federal government has preemption, and the FAA uses its grant assurance and enforcement authorities to protect its interest in regulating the national airspace.

Naples Airport Authority is an outlier in successfully challenging an FAA ruling that their ban on Stage 2 aircraft was unreasonable and contrary to their grant assurance obligations.⁵⁶ The DC Circuit Court of Appeals found that the airport justified its decision to ban Stage 2 aircraft in demonstrating that the sound environment in the community supports the decision. Prior to implementing the ban, the airport authority conducted a noise study pursuant to ANCA that found "approximately 1,400 residents were exposed to noise levels in excess of DNL 60dB and that a restriction on all Stage 2 aircraft would affect only one percent of aircraft operations at the airport, while considerably reducing the number of people exposed to significant noise levels."⁵⁷ The record that the airport compiled in justifying the ban included multiple items that established Naples was a quiet community where noise in excess of DNL 60 dB was excessive. These justifications included: the City of Naples adopting an ordinance forbidding all noise in excess of DNL 60 dB; that the community was a quiet retirement community; and that the enjoyment of outdoor living was important for the community; and that aircraft noise was the leading cause of noise complaints in Naples.⁵⁸ If, as the airport operators, RMMA and Jefferson County, not Louisville, were interested in trying to identify reasonable restrictions regarding the operation of Stage 3 aircraft pursuant to ANCA, the City could consider facilitating the collection and development of documentation justifying the restrictions, as was done in Naples.

FAA REAUTHORIZATION

Congress passed the FAA Reauthorization Act of 2024 on May 16, 2024, and included multiple provisions relevant to airport noise. The legislation calls for the FAA to take multiple actions related to aviation noise,

⁵⁰ Of note, Stage 2 aircraft have not been permitted in the U.S. airspace since 2015. See 14 C.F.R. Part 91, and Notice, *Stage 3 Compliance for Jets Weighing 75,000 Pounds or Less After December 31, 2015*, 80 Fed. Reg. 42,021 (July 16, 2015).

⁵¹ FAA Order 5180.6B at 13.5.

⁵² *Id.* at 13.14.

⁵³ FAA Order 5180.6B at 13.14.

⁵⁴ *Id.*

⁵⁵ See Final Decision, FAA Determination Pursuant to Part 161 – LAWA Application dated January 12, 2013 (Supplemented May 14, 2014) (Nov. 7, 2014) (rejecting application).

⁵⁶ *City of Naples Airport Auth. V. FAA*, 366 U.S. App. D.C. 161, 165, 409 F.3d 431, 435 (2005).

⁵⁷ *Id.*

⁵⁸ *Id.*

three of which are relevant here. First, the act calls on the FAA to review and update Part 150 and Part 161 within one year after passage of the legislation. Congress calls on the FAA to “clarify existing and future noise policies and standards and seek feedback from airports, airport users, and individuals living in the vicinity of airports and in airport adjacent communities”.⁵⁹

Second, the legislation specifies actions the FAA shall consider in revising flight procedures to reduce the effects of undesirable aircraft noise. The congressionally recommended actions for the FAA include:

- Implement flight procedures that can mitigate the impact of aircraft noise, based on a consensus community recommendation.
- Work with airport sponsors and potentially impacted neighboring communities in establishing or modifying aircraft arrival and departure routes.
- In collaboration with local governments, discourage local encroachments of residential or other buildings near airports that could create future aircraft noise complaints or impact airport operations or aviation safety.⁶⁰

Third, the legislation calls on the FAA to establish an Aircraft Noise Advisory Committee. The advisory committee will advise the FAA Administrator on issues facing the aviation community related to aircraft noise exposure and existing FAA noise policies and regulations. The membership of the committee shall include representatives of airport-adjacent communities from geographically diverse regions.⁶¹

As of this writing, the FAA has not published any information showing their work to implement these requirements.

The City and the larger community and community-members can consider federal advocacy efforts to ensure the FAA acts on these requirements. These advocacy efforts can include working with your congressional delegation, reaching out directly to the FAA, engaging with industry groups, building partnership, or grassroots efforts.

AVIATION FUEL CONGRESSIONAL AND REGULATORY ACTION

AIRCRAFT EMISSIONS

The 1970 amendment to the Clean Air Act provides the Environmental Protection Agency (EPA) and FAA the authority to set aircraft emission standards.⁶² The act expressly preempts states from imposing or enforcing stricter emissions standards than the federal government.⁶³ In 2023, the EPA took the first step in regulating leaded avgas by making a finding of endangerment from aviation fuel lead emissions.⁶⁴ The EPA finalized the Finding in October 2023 which encompasses both endangerment and cause or contribute findings.⁶⁵ Of note, no standards or further restrictions on the use, sale, distribution, and general availability of leaded fuel have been promulgated to date.

⁵⁹ Public Law 118-63, §786.

⁶⁰ *Id.* at 787.

⁶¹ *Id.* at 797.

⁶² 42 U.S.C. §§ 7571(a)(2) and 7572(a).

⁶³ “No State or political subdivision thereof may adopt or attempt to enforce any standard respecting emissions of any air pollutant from any aircraft or engine thereof unless such standard is identical to a standard applicable to such aircraft under this part.” 42 U.S.C. § 7573.

⁶⁴ 88 Fed. Reg. 72372 (Oct. 20, 2023).

⁶⁵ 88 FR 72372 (Vol. 88 No. 202

Separately, the FAA and industry formed the Eliminate Aviation Gasoline Lead Emissions (EAGLE) program in February 2022 to work toward a lead-free aviation system by no later than 2030.⁶⁶ EAGLE membership is made up of representatives from the FAA, fuel producers and distributors, airport operators, engine and aircraft manufacturers, communities that support general aviation airports, and environmental stakeholders.⁶⁷ In partnership with EAGLE, the FAA is working to obtain FAA authorization for new fuels through fleet authorization and aircraft certification processes. The fleet authorization process was created in response to the FAA Reauthorization Act of 2018, and will result in qualified unleaded fuel candidates authorized for use in aircraft.⁶⁸ The FAA Reauthorization Act of 2018 requires the FAA to follow specific procedures and make certain findings to approve the use of unleaded avgas. Additionally, the FAA will require that specific engine and aircraft models meet specific minimum standards as part of the supplemental type certification (STC) process.⁶⁹

Although, in the last two FAA Reauthorizations, Congress has also restricted airports' ability to act regarding aviation fuel. In the 2018 FAA Reauthorization, Congress "restricted the ability of airport proprietors to limit the sale and use of aviation fuel."⁷⁰ The 2024 FAA Reauthorization "prohibits grant-obligated airports . . . from limiting the sale or use of leaded aviation fuel". P.L. 118-63 (May 16, 2024). Further, the FAA has stated that a "restriction on the sale or use of [leaded avgas] at a federally obligated airport is inconsistent with Grant Assurance 22".⁷¹

The City of Louisville may consider strategies to assist RMMA in facilitating the adoption of new fuel standards. This may involve advocating for additional federal or state funding. Alternatively, the City may consider supporting the RMMA financially to ensure they acquire and install the new fuel tank.

FAA PART 16 DETERMINATION REGARDING AVGAS

On March 24, 2025, the FAA issued a highly anticipated determination regarding a complaint filed under 14 C.F.R. Part 16 in response to a California County's attempt to ban the sale of avgas at its airports.⁷² The FAA found that a countywide ban on the acquisition, storage, and sale of 100LL avgas at two of the County's federally obligated airports violated the County's federal grant obligations. Specifically, the FAA held that: (i) "establishing the exclusive right to sell one or more types of fuel" does not give a federally obligated airport "the right to prohibit the sale or use of all other fuels by commercial service providers" and that "[a]ny attempt to establish such a prohibition is an unreasonable and unjustly discriminatory restriction" in violation of Grant Assurance 22(a)⁷³; (ii) the implementation of unreasonable rules, such as restrictive fueling permits, that effectively prevent a user from "self-fueling with the fuel(s) of its preference

⁶⁶ FAA, Building an Unleaded Future by 2023, <https://www.faa.gov/unleaded>.

⁶⁷ United States Environmental Protection Agency, *Regulatory Announcement, EPA Finalizes Endangerment Finding for Lead Emissions from Aircraft that Operate on Leaded Fuel*, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P1018JNL.pdf>.

⁶⁸ PS-AIR-600-20-01, Policy Statement, Enabling the Use of Unleaded Aviation Gasoline in Piston Engine Aircraft and Aircraft Engines through the Piston Aviation Fuels Initiative (PAFI) Fleet Authorization Process. March 20, 2023.

⁶⁹ Section 565 of the FAA Reauthorization Act of 2018, allows for the use of an unleaded aviation gasoline if the FAA Administrator "adopts a process (other than the traditional means of certification) to allow eligible aircraft engines to operate using a qualified replacement unleaded gasoline in a manner that ensures safety."

⁷⁰ Public Law 115-254, at § 565.

⁷¹ U.S. Federal Aviation Administration, *FAA Unleaded Development FAQs and Definitions*, https://www.faa.gov/sites/faa.gov/files/FAQs_FAA_UL_Fuel_Development.pdf.

⁷² *Aircraft Owners and Pilots Association v. County of Santa Clara*, FAA Docket No. 16-22-08, Director's Determination (Nov. 9, 2023).

⁷³ *Id.* at 14.

from a source of its choosing” is a violation of Grant Assurance 22(f)⁷⁴; and (iii) enacting prohibitions against leaded fuels creates an exclusive right by favoring aircraft that can operate on unleaded fuel to the detriment of those that cannot and by favoring manufacturers and suppliers of unleaded fuel to the detriment of those that manufacture or supply leaded fuel, which qualifies as an “unreasonable restriction on legitimate aeronautical activities . . . in violation of Grant Assurance 23.”⁷⁵ This decision demonstrates that airports that attempt to ban leaded fuel before a viable alternative is available do so at the risk of facing FAA enforcement actions.

Any action by RMMA to restrict the sale of leaded aviation fuel at its airport may subject them to FAA scrutiny. The RMMA Airport Director told a reporter at the October 2023 press conference that RMMA would keep a small amount of leaded fuel on hand to remain in compliance with the federal requirement.⁷⁶ As RMMA continues to take steps to introduce unleaded aviation fuels at its airfield it may consider how those steps affect the ability of aviation fuel companies to service the airport.

COLORADO STATE REGULATION OF AVIATION FUEL

In 2024, the State of Colorado enacted the Reduce Aviation Impacts on Communities law that encourages state general aviation airports, like RMMA, to transition to unleaded aviation fuel.⁷⁷ The law provides an income tax credit to aircraft owners that transition to unleaded fuel, guarantees funding for airports to transition to unleaded aviation gasoline, and requires some airports to adopt a plan to phase out the sale of leaded gasoline by 2030.⁷⁸ Additionally, the state subjects aviation gas and jet fuel to a tax.⁷⁹

RMMA announced in October 2023 that it would phase out leaded fuel at the airport.⁸⁰ RMMA has procured a unleaded fuel truck, has applied for a federal grant for a new unleaded tank, and is working with airport users to identify appropriate unleaded fuels.⁸¹ RMMA and the City can continue to work with state officials to identify opportunities to assist and encourage the adoption of unleaded aviation fuel at RMMA.

POTENTIAL RMMA ACTIONS

AIRCRAFT NOISE

Airport operators have some authority to control the effects of aircraft noise tied to their role as a proprietor. These powers include their ability to select an airport site, acquire land, assure compatible land use, and control airport design.⁸²

RMMA has an opportunity to use these powers as it works to expand the airport’s capacity. The airport was recently awarded a grant to construct a new taxiway and refurbish and expand an existing one. In preparing for this development to expand capacity, RMMA could consider how its design can facilitate noise friendly and environmentally friendly operations.

⁷⁴ *Id.* at 20.

⁷⁵ *Id.* at 24–25.

⁷⁶ *Rocky Mountain Metropolitan Airport announces elimination of leaded fuel*, ABC NEWS DENVER (October 4, 2023), <https://www.youtube.com/watch?v=8cp1fMqtHHM>.

⁷⁷ CO HB 24-1235.

⁷⁸ *Id.*

⁷⁹ Section 39-27-102 (1)(a)(IV), C.R.S.

⁸⁰ John Aguilar, *Jefferson County airport announces full shift to unleaded fuel by 2027 – reducing contamination of neighborhoods*, THE DENVER POST (Oct. 4, 2023), <https://www.denverpost.com/2023/10/04/rocky-mountain-airport-lead-gasoline-noise/>.

⁸¹ RMMA FREQUENTLY ASKED QUESTIONS, [<https://www.jeffco.us/FAQ.aspx?QID=1435>] (last visited May 6, 2025).

⁸² FAA Order 5190.6b.

Further, with an understanding that noise will increase with additional operations, RMMA can consider working with local partners to modify compatible land use zoning and potentially acquire land as necessary. However, these are expensive options as the airport and the communities are already established and in place, and communities have multiple residences that are affected.

RMMA's plans for a taxiway extension will trigger a National Environmental Policy Act (NEPA) review because it is both a federally funded project and requires a change to the RMMA airport layout plan. The NEPA review for these projects will include an evaluation of potential noise and air quality effects, and may provide an avenue for City engagement if a public comment period is required.

AVIATION FUEL

RMMA has received state funding for their transition to unleaded aviation fuel and had requested federal funding for the deployment of a new fuel tank for unleaded fuel. RMMA can work with the State of Colorado to secure additional funding to support this transition.

CITY OPTIONS

ADVOCATE

The City has multiple advocacy options that may produce positive outcomes for its residents affected by RMMA airport noise and environmental effects. These include engaging RMMA directly, working with other city or county governments, engaging state and federal partners, and educating City residents.

LITIGATE

The City may choose to litigate against Jefferson County and RMMA for various state law claims. To date, efforts to sue the county and airport regarding airport noise and environmental effects have proven unsuccessful. The City of Superior and Boulder County suit against Jefferson County in the state of Colorado was dismissed on federal preemption grounds on March 28, 2025. See *Town of Superior and Cnty. of Boulder v. Jefferson Cnty.*, No 2024CV30221 (Colo. Dist. Ct. filed Mar. 28, 2025). The Homeowners Association case is still outstanding.

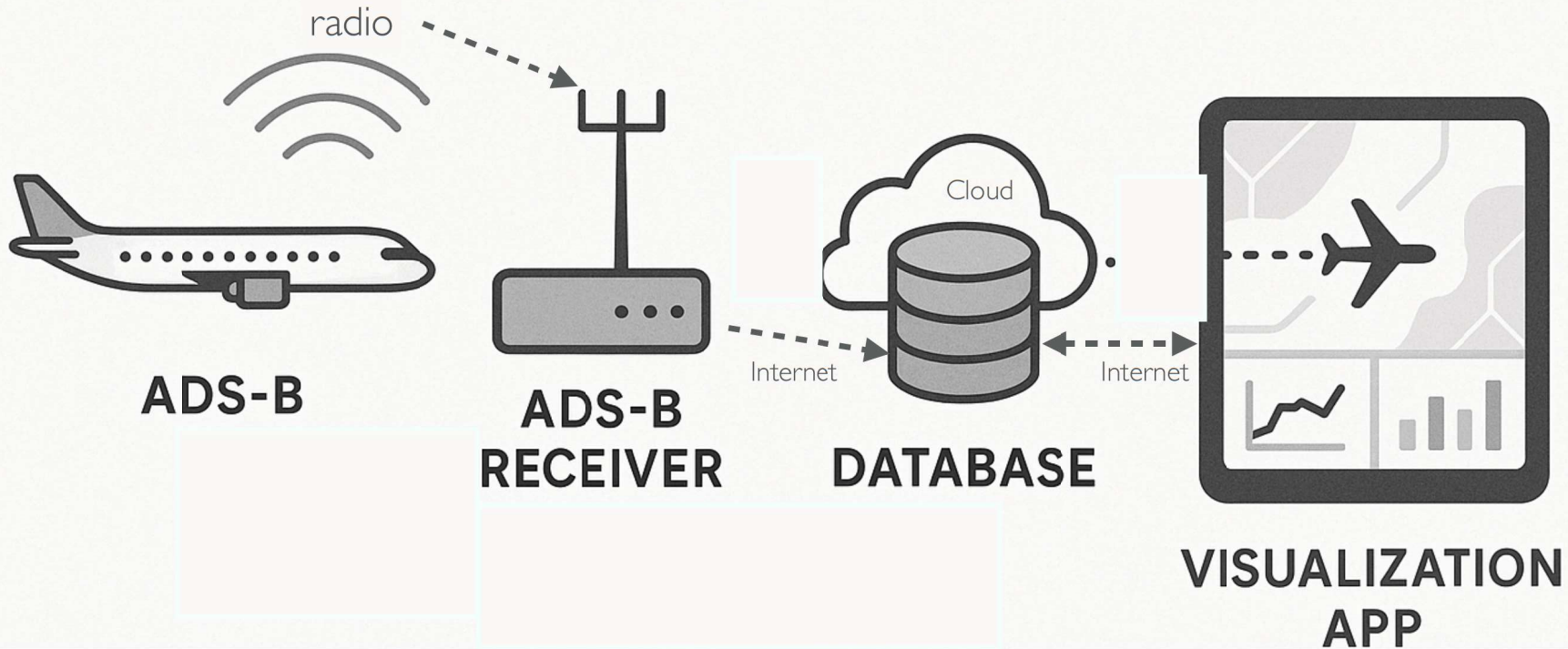
ENFORCE

The City has no legal ability to directly regulate RMMA or the operation of aircraft. As addressed earlier in this memo, courts have consistently held that only the airport proprietor has a (limited) ability to regulate aircraft operations. Furthermore, from a practical perspective, even if the City were to decide to implement a noise ordinance attempting to control aircraft within the City's airspace, it would be incredibly unlikely that any pilot or aircraft owner would recognize or accede to the City's attempt to regulate, essentially rendering the regulation ineffective. Finally, it is highly likely that any attempt by the City to regulate aircraft operations would result in prompt challenges to those regulations or ordinances, which could result in costly litigation by the City if it were to defend those regulations.

RMMA AIR TRAFFIC STUDY

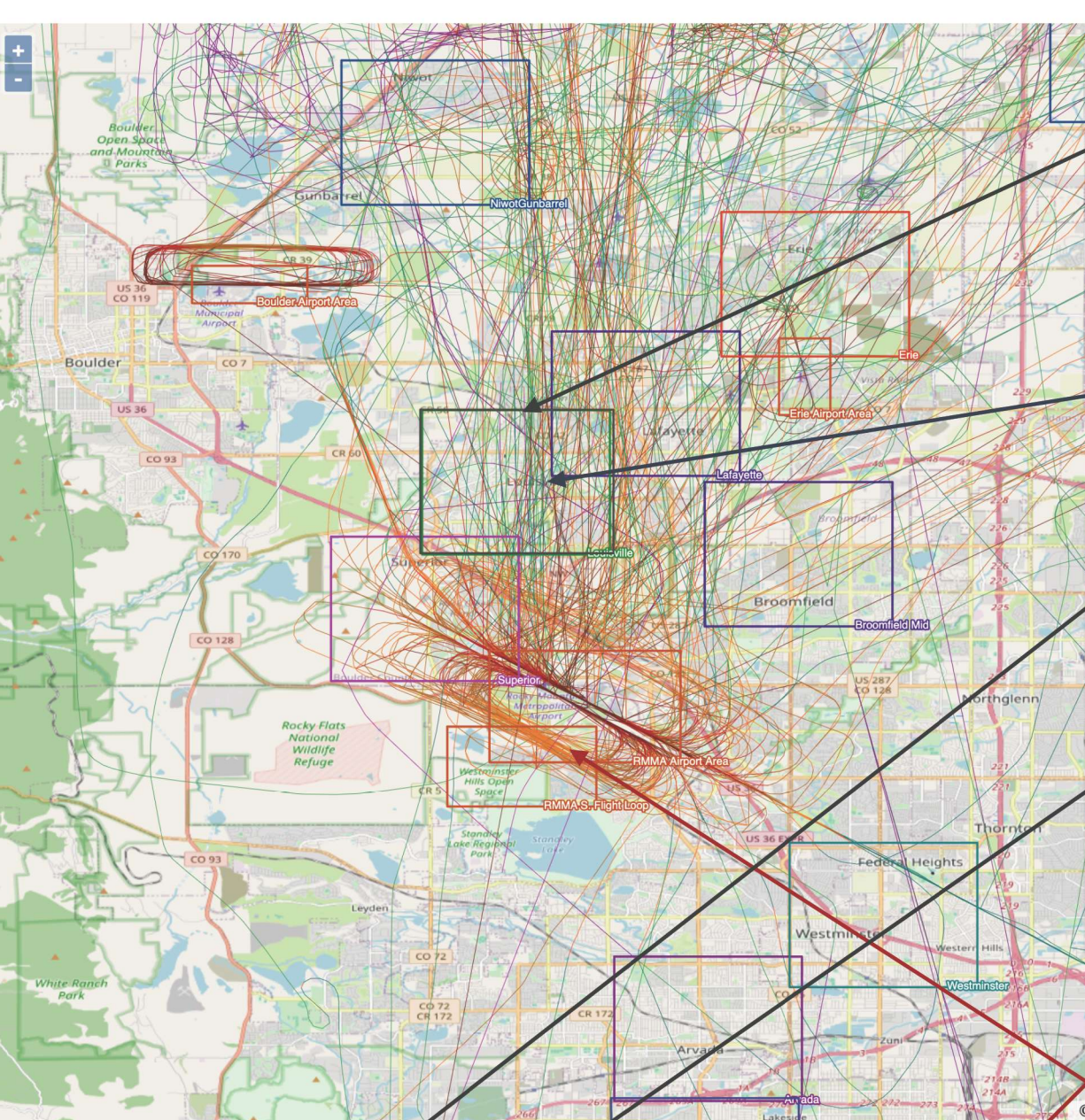
Presented 10/21/25

ADS-B data collection



ADS-B records are transmitted once per second from all aircraft to any listening receiver
For the front range area, about 500,000 ADS-B records per day

- **time** - Unix timestamp: The time at which the state vector was valid.
- **icao24** - The unique ICAO 24-bit transponder ID assigned to the aircraft.
- **lat, lon** - Latitude and longitude (WGS84 format).
- **velocity** - Speed over ground in meters per second.
- **heading** - The direction of movement in degrees from geographic north.
- **vertrate** - Vertical speed in meters per second (positive = ascending, negative = descending).
- **callsign** - The flight identifier broadcast by the aircraft.
- **baroaltitude** - Barometric altitude measured by the aircraft.
- **geoaltitude** - Geometric altitude determined by GNSS (GPS).



Selection Area: One of the 5km square areas shown on the map, Louisville is always selected for this presentation

Traffic density: The more opaque the color, the more flights passed over a particular place on the map

Flights: count of aircraft within the Louisville in the selection area (per day)

Overpasses: A count each time a flight passes over Louisville in the selection area

Color: The color on the map indicates the GPS aircraft altitude corresponding to colors in the legend that are checked

RMMA Airport Area start time 12:00am start date 05/01/2025 9000ft 1000x1200
Draw Sample Area end time 12:00pm end date 05/01/2025 5000ft submit

aircraft local arrivals departures
fixed wing ☒ ☒ ☒ ☒
jet ☒ ☒ ☒ ☒
rotorcraft ☐ ☐ ☐ ☐

refresh clear ff 0

4000-5850 ☒	6700-7000 ☒
5850-6100 ☒	7000-8000 ☒
6100-6350 ☒	8000-9000 ☒
6350-6600 ☒	9000-10000 ☒
6600-6700 ☒	10000-100000 ☒

altitude 0

aircraft ☒

flights 47 overpasses 80

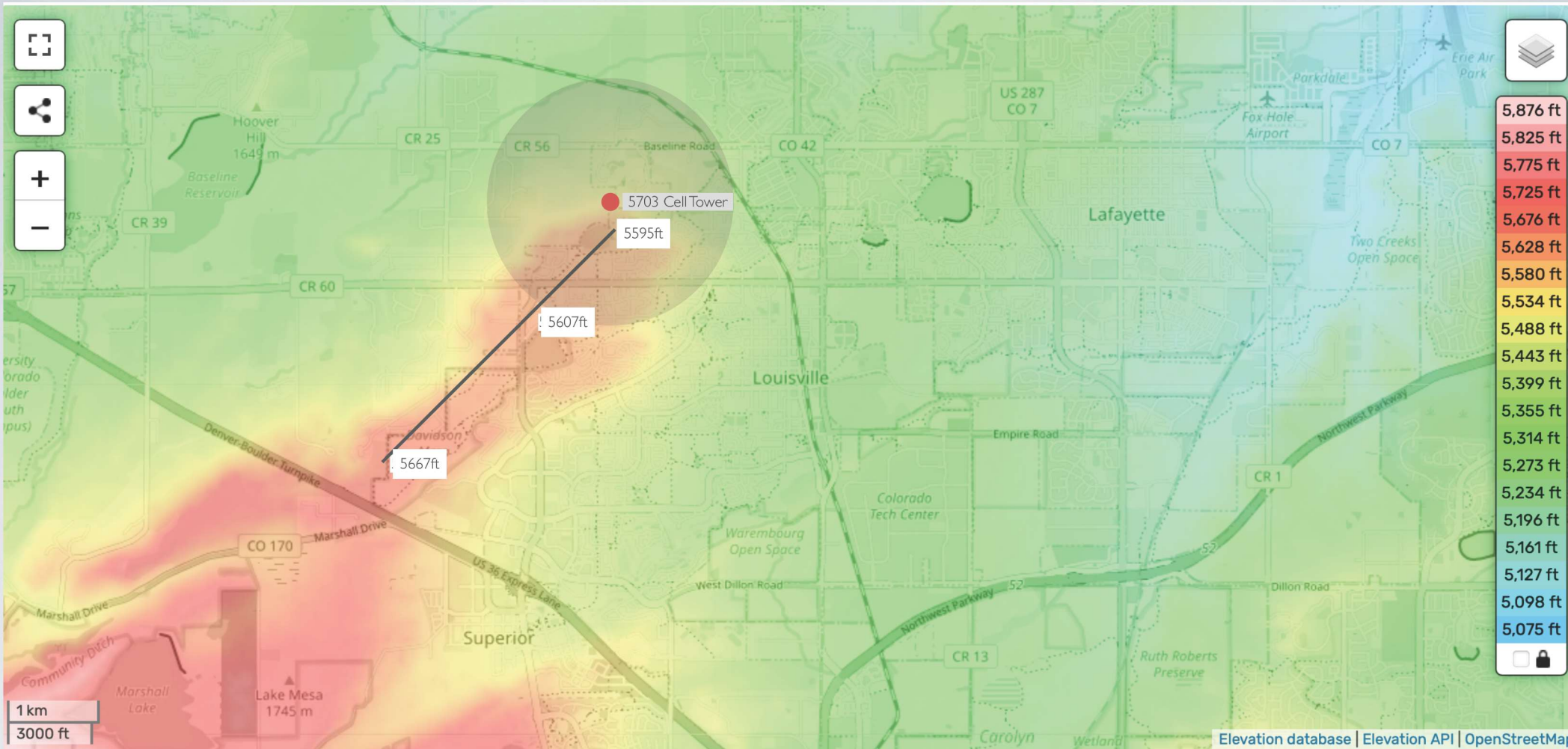
Flights counted: The flights counted are either starting from, or ending in RMMA, or both. Other traffic is not counted.

The FAA defines minimum safe altitudes in 14 CFR § 91.119:

Minimum Altitudes for VFR Flights:

- Anywhere:
 - An altitude allowing, if a power unit fails, an emergency landing without undue hazard to persons or property on the surface
- Over congested areas (**cities**, towns, or settlements):
 - **1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet.**
- Over other than congested areas:
 - At least 500 feet above the surface, except over open water or sparsely populated areas.
- Over open water or sparsely populated areas:
 - Aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.

HOW LOUISVILLE ELEVATION ABOVE GROUND LEVEL (AGL) WAS DETERMINED



The image above is a digital elevation map (DEM)

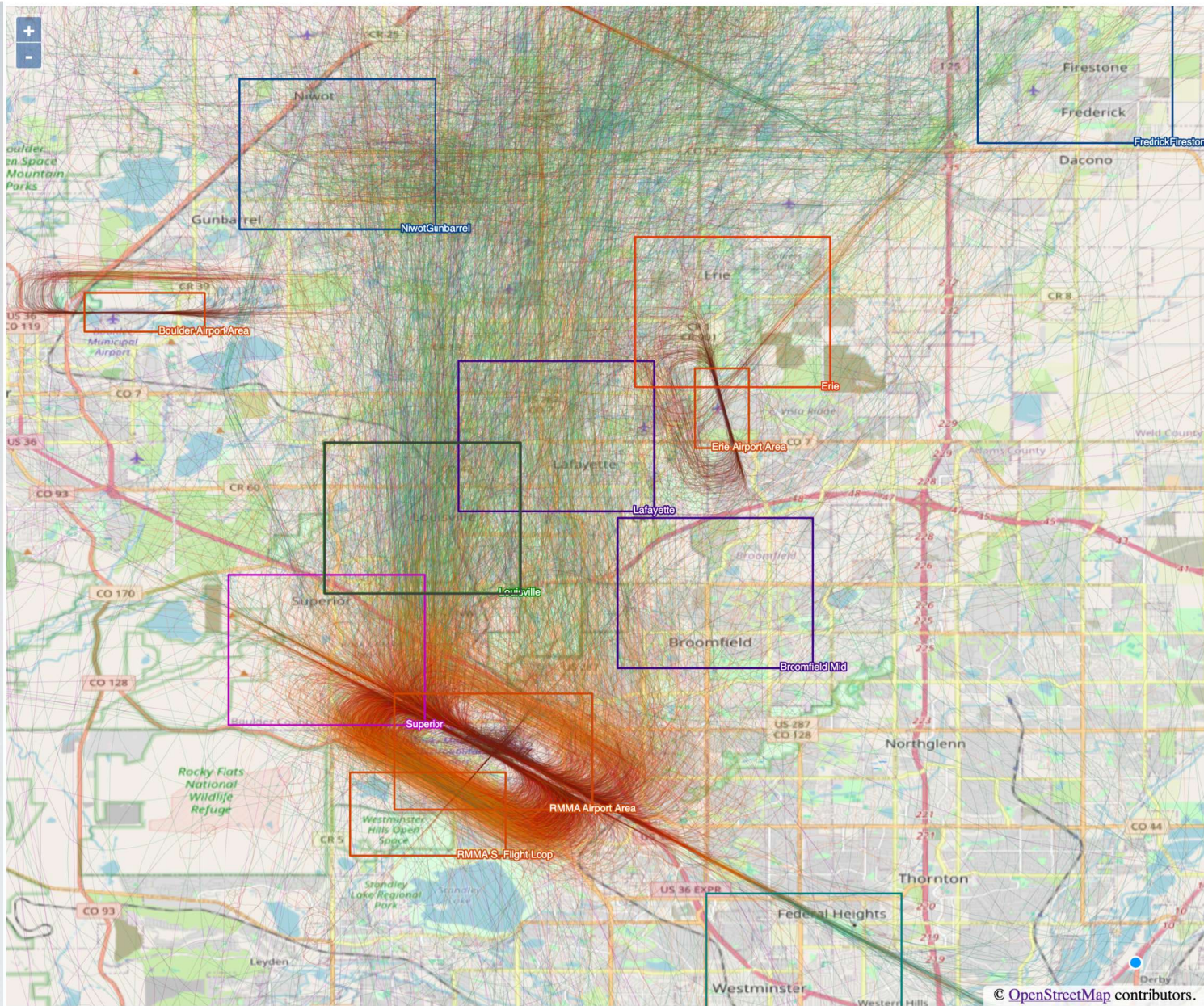
The colors represent ground levels in Louisville

The line on the image follows the higher altitudes in Louisville

Using the above, the minimums above ground level (AGL) are estimated:

Ground level is approximately **5600ft** so, **500AGL = 6100ft, 1000AGL = 6600ft**

All flight overpasses over Louisville
From/To RMMA
Month of May in 2018-2025

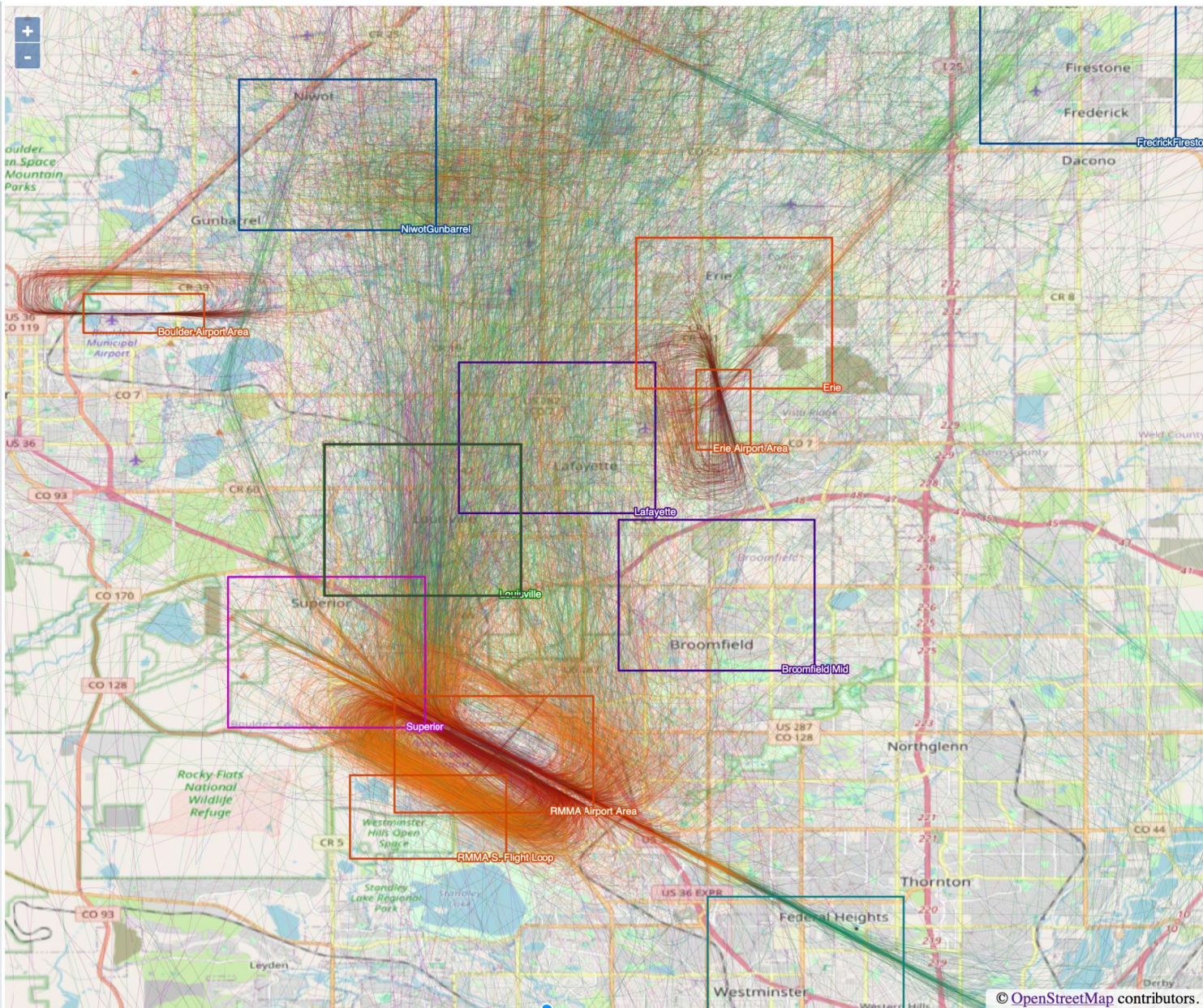


All Flights
May 2018

1132 overpasses

RMMA Airport Area	start time 12:00am	start date 05/01/2018	9000ft	1000x1200
No Selection	end time 12:00pm	end date 05/31/2018	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	☒	6700-7000	☒
fixed wing	☒	☒	☒	5850-6100	☒	7000-8000	☒
jet	☒	☒	☒	6100-6350	☒	8000-9000	☒
rotorcraft	☐	☐	☐	6350-6600	☒	9000-10000	☒
				6600-6700	☒	10000-100000	☒
flights	overpasses	overpass duration	altitude	aircraft			
679	1132	00:58:45	0				



All Flights
May 2019

1223 overpasses

RMMA Airport Area
 No Selection

start time 12:00am
 end time 12:00pm

start date 05/01/2019
 end date 05/31/2019

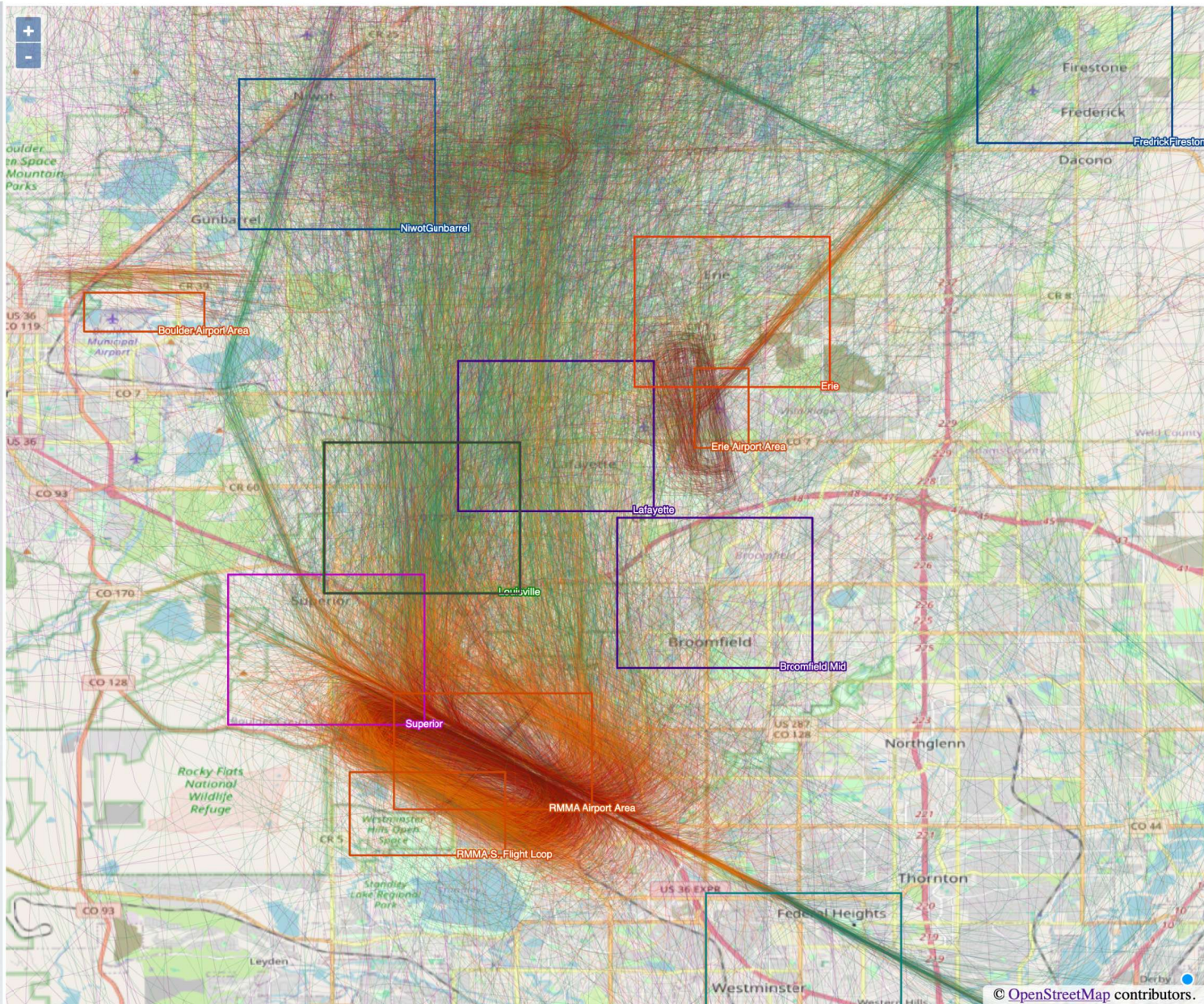
9000ft
 5000ft

1000x1200
 submit

aircraft	local	arrivals	departures		
fixed wing ☒	☒	☒	☒	4000-5850 ☒	6700-7000 ☒
jet ☒	☒	☒	☒	5850-6100 ☒	7000-8000 ☒
rotorcraft ☐	☐	☐	☐	6100-6350 ☒	8000-9000 ☒
				6350-6600 ☒	9000-10000 ☒
				6600-6700 ☒	10000-100000 ☒

refresh
 clear
 40 0

flights 806
 overpasses 1223
 overpass duration 21:06:40
 altitude 0
 aircraft



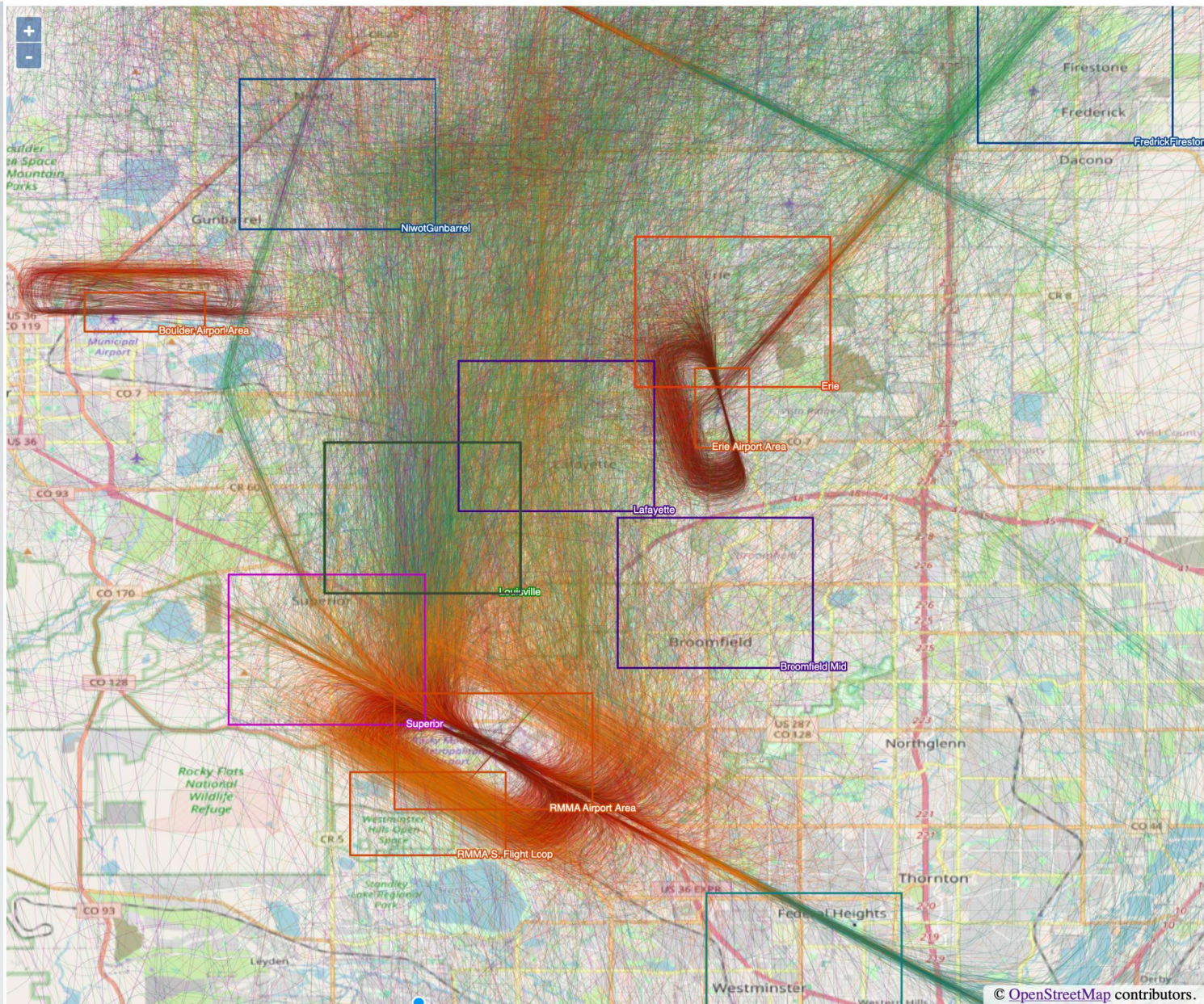
All Flights
May 2020

1823 overpasses

RMMA Airport Area
 No Selection

start time end time
 start date end date
 9000ft 5000ft

aircraft	local	arrivals	departures	refresh	clear	40	0	4000-5850	5850-6100	6100-6350	6350-6600	6600-6700	6700-7000	7000-8000	8000-9000	9000-10000	10000-100000	altitude	aircraft
fixed wing	☒	☒	☒	refresh	clear	40	0	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒
jet	☒	☒	☒					☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒
rotorcraft	☐	☐	☐					☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒
flights	overpasses	overpass duration																	
1173	1823	08:48:20																	



All Flights
May 2021

2369 overpasses

RMMA Airport Area
No Selection

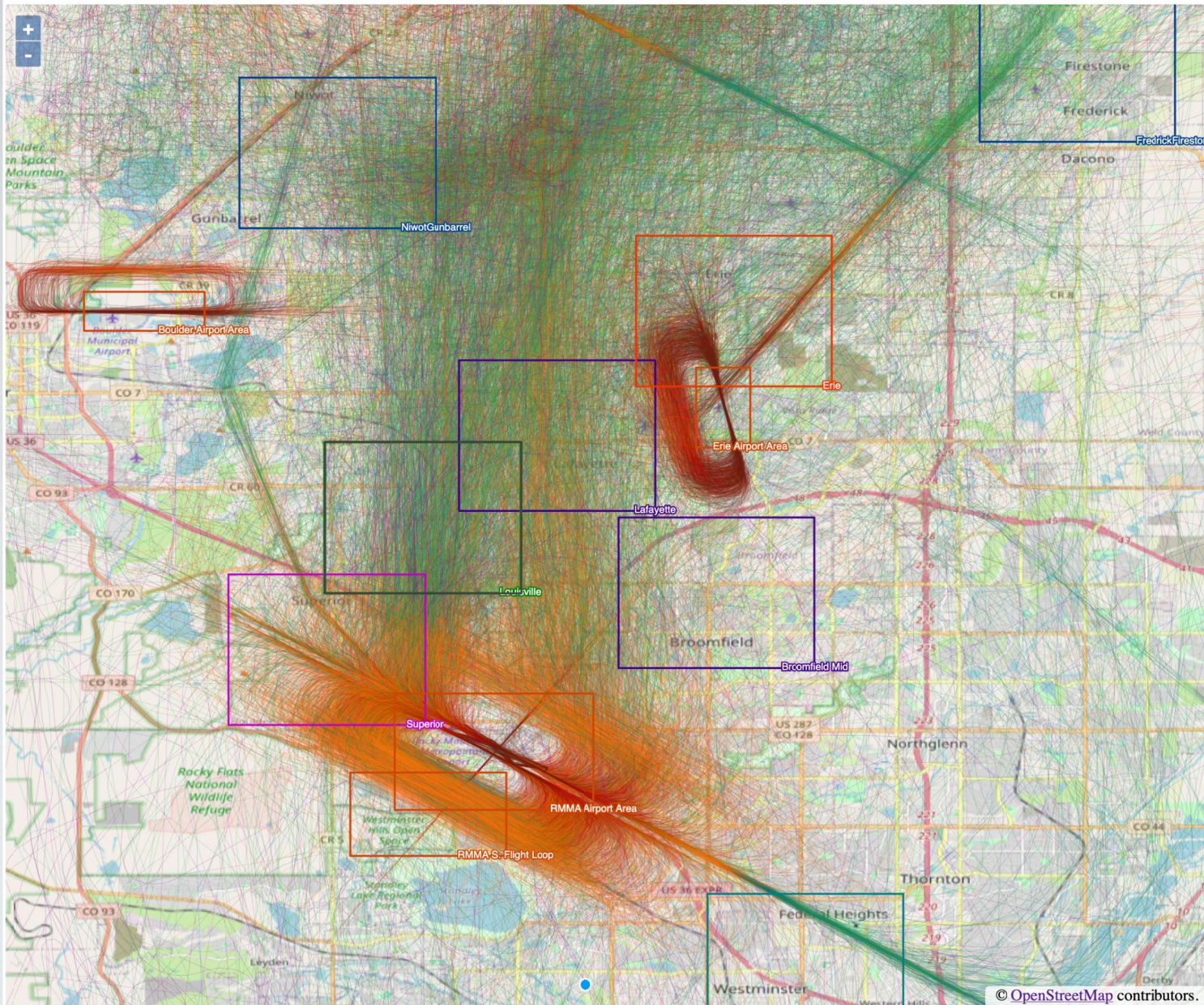
start time 12:00am
end time 12:00pm

start date 05/01/2021
end date 05/31/2021

9000ft
5000ft

1000x1200
submit

aircraft	local	arrivals	departures	refresh	clear	40	0	4000-5850	5850-6100	6100-6350	6350-6600	6600-6700	6700-7000	7000-8000	8000-9000	9000-10000	10000-100000	altitude	aircraft
fixed wing	☒	☒	☒	refresh	clear	40	0	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒
jet	☒	☒	☒					☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒
rotorcraft	☐	☐	☐					☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒
flights	overpasses	overpass duration																	
1461	2369	08:22:55																	



All Flights
May 2022

2288 overpasses

RMMA Airport Area
 No Selection

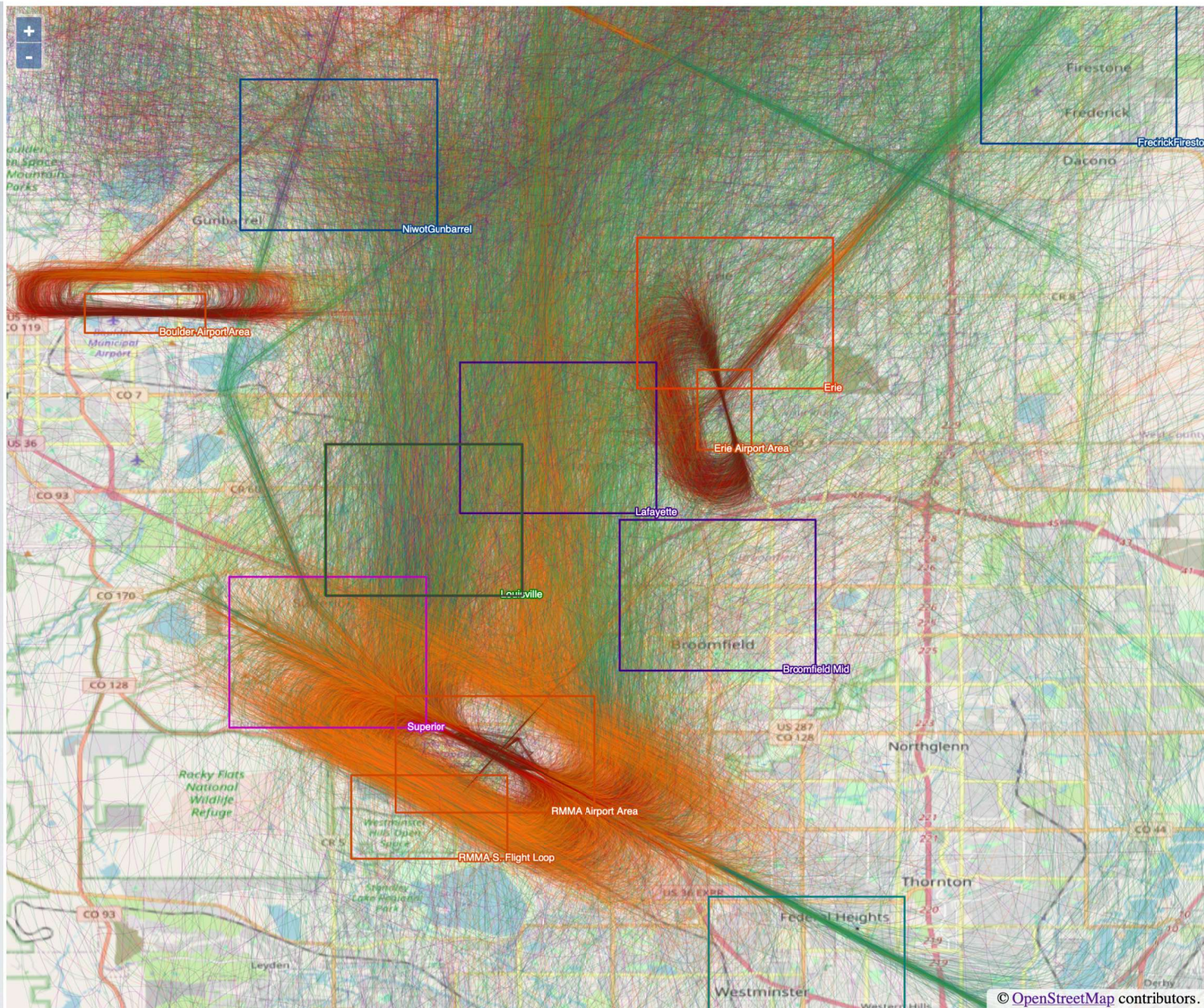
start time end time
 start date end date
 9000ft 1000x1200
 5000ft

aircraft	local	arrivals	departures	4000-5850	6700-7000
fixed wing	☒	☒	☒	☒	☒
jet	☒	☒	☒	☒	☒
rotorcraft	☐	☐	☐	☒	☒

flights 1391 overpasses 2288 overpass duration 02:56:20 altitude 0 aircraft



aircraft	local	arrivals	departures		4000-5850	☒	☐	6700-7000	☒	☐	
fixed wing	☒	☒	☒	refresh	5850-6100	☒	☐	7000-8000	☒	☐	set
jet	☒	☒	☒	clear	6100-6350	☒	☐	8000-9000	☒	☐	clear
rotorcraft	☐	☐	☐	40 0	6350-6600	☒	☐	9000-10000	☒	☐	
					6600-6700	☒	☐	10000-100000	☒	☐	
flights		overpasses		overpass duration				altitude		aircraft	
1888		3300		12:42:10				0			



All Flights
May 2024

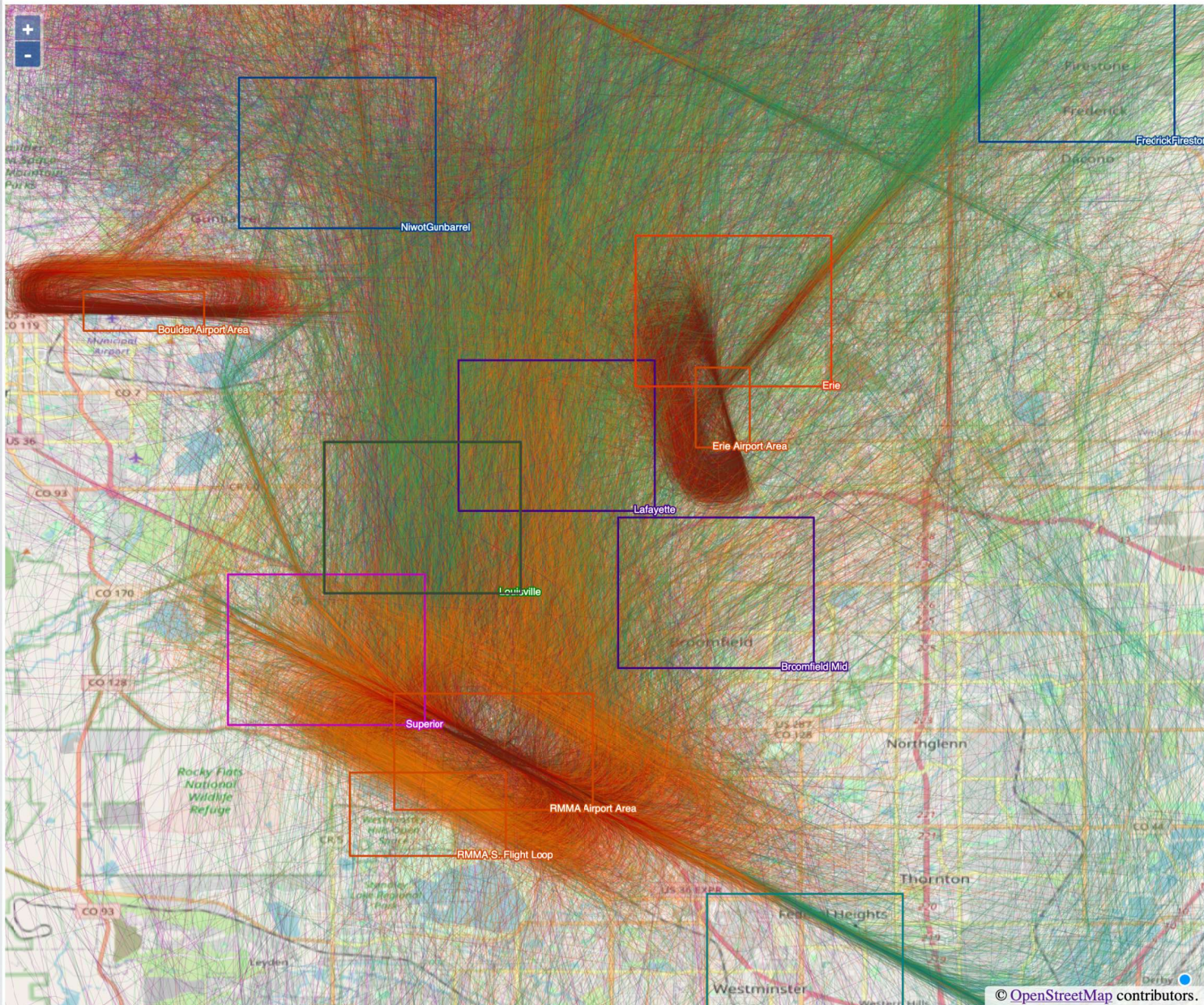
3493 overpasses

RMMA Airport Area start time 12:00am start date 05/01/2024 9000ft 1000x1200
 No Selection end time 12:00pm end date 05/31/2024 5000ft submit

aircraft	local	arrivals	departures	4000-5850	6700-7000
fixed wing ☒	☒	☒	☒	☒	☒
jet ☒	☒	☒	☒	☒	☒
rotorcraft ☐	☐	☐	☐	☐	☐

refresh clear 40 0 6600-6700 10000-100000 altitude aircraft

flights 1783 overpasses 3493 overpass duration 22:53:40



All Flights
May 2025

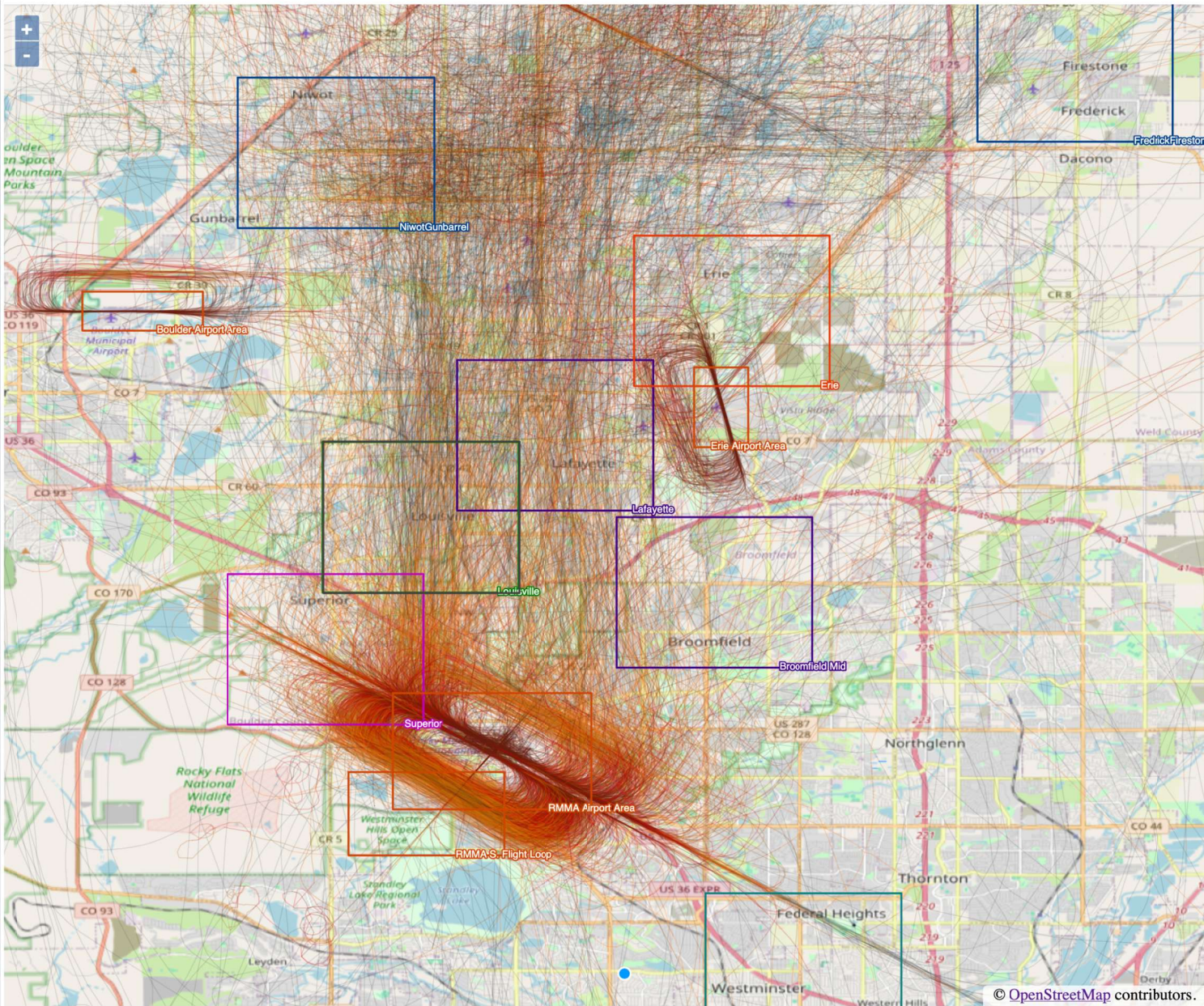
3992 overpasses

RMMA Airport Area start time 12:00am start date 05/01/2025 9000ft
end time 12:00pm end date 05/31/2025 5000ft

aircraft	local	arrivals	departures	refresh	clear	40	0	6700-7000	7000-8000	8000-9000	9000-10000	10000-100000	aircraft
fixed wing	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒
jet	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒
rotorcraft	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐

flights 1839 overpasses 3992 overpass duration 17:16:35 altitude 0

Flight overpasses over Louisville
From RMMA 2018-2025
with altitudes **less than 1000 ft AGL**

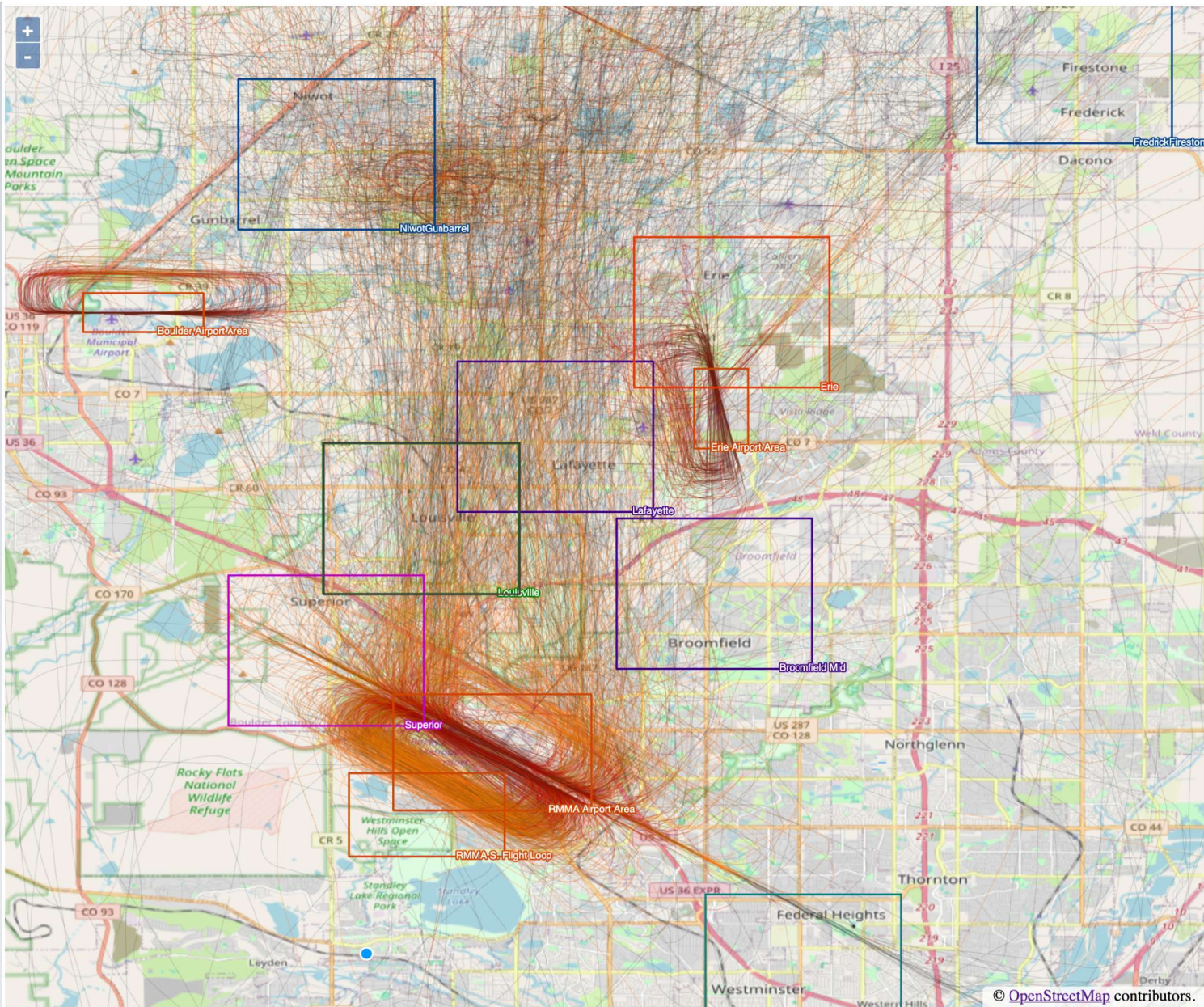


May **2018**
less than 1000 ft AGL
(6600ft)

465 overpasses

RMA Airport Area start time 12:00am start date 05/01/2018 9000ft 1000x1200
 No Selection end time 12:00pm end date 05/31/2018 5000ft submit

aircraft	local	arrivals	departures	refresh	clear	40 v	0 v	6600-6700 v	6700-7000 v	7000-8000 v	8000-9000 v	9000-10000 v	10000-100000 v	altitude	aircraft
fixed wing ☒	☒	☒	☒	refresh	clear										
jet ☒	☒	☒	☒												
rotorcraft ☐	☐	☐	☐												
flights	overpasses	overpass duration													
305	465	06:18:55													



May 2019
less than 1000 ft AGL
(6600ft)

354 overpasses

RMMA Airport Area
 No Selection

start time 12:00am
 end time 12:00pm

start date 05/01/2019
 end date 05/31/2019

9000ft
 5000ft

1000x1200
 submit

aircraft local arrivals departures
 fixed wing ☒ ☒ ☒ ☒
 jet ☒ ☒ ☒ ☒
 rotorcraft ☐ ☐ ☐ ☐

refresh
 clear
 40 0

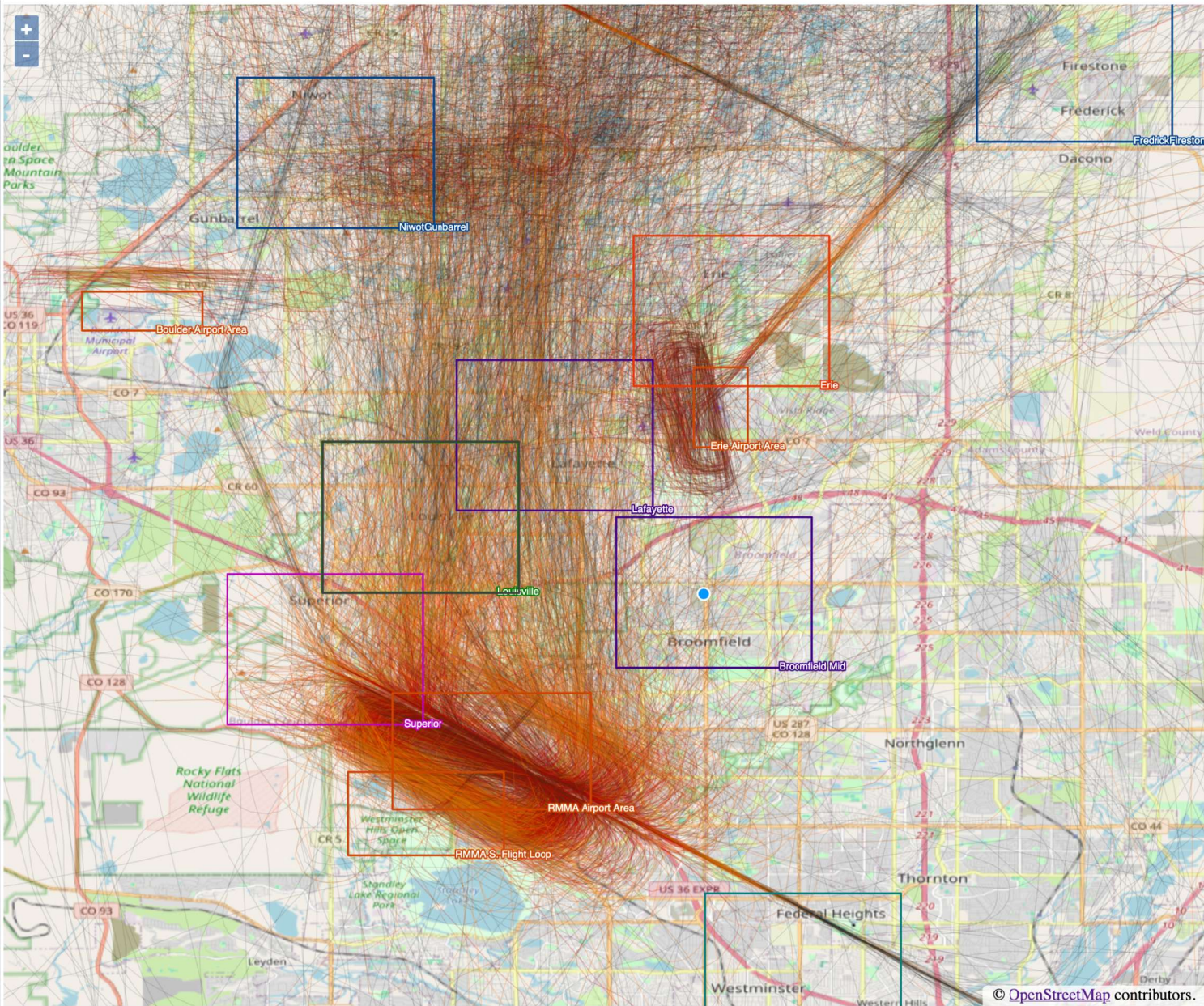
flights 259
 overpasses 354
 overpass duration 19:42:50

4000-5850 ☒
 5850-6100 ☒
 6100-6350 ☒
 6350-6600 ☒
 6600-6700 ☐

6700-7000 ☐
 7000-8000 ☐
 8000-9000 ☐
 9000-10000 ☐
 10000-100000 ☐

altitude 0
 aircraft

set
 clear

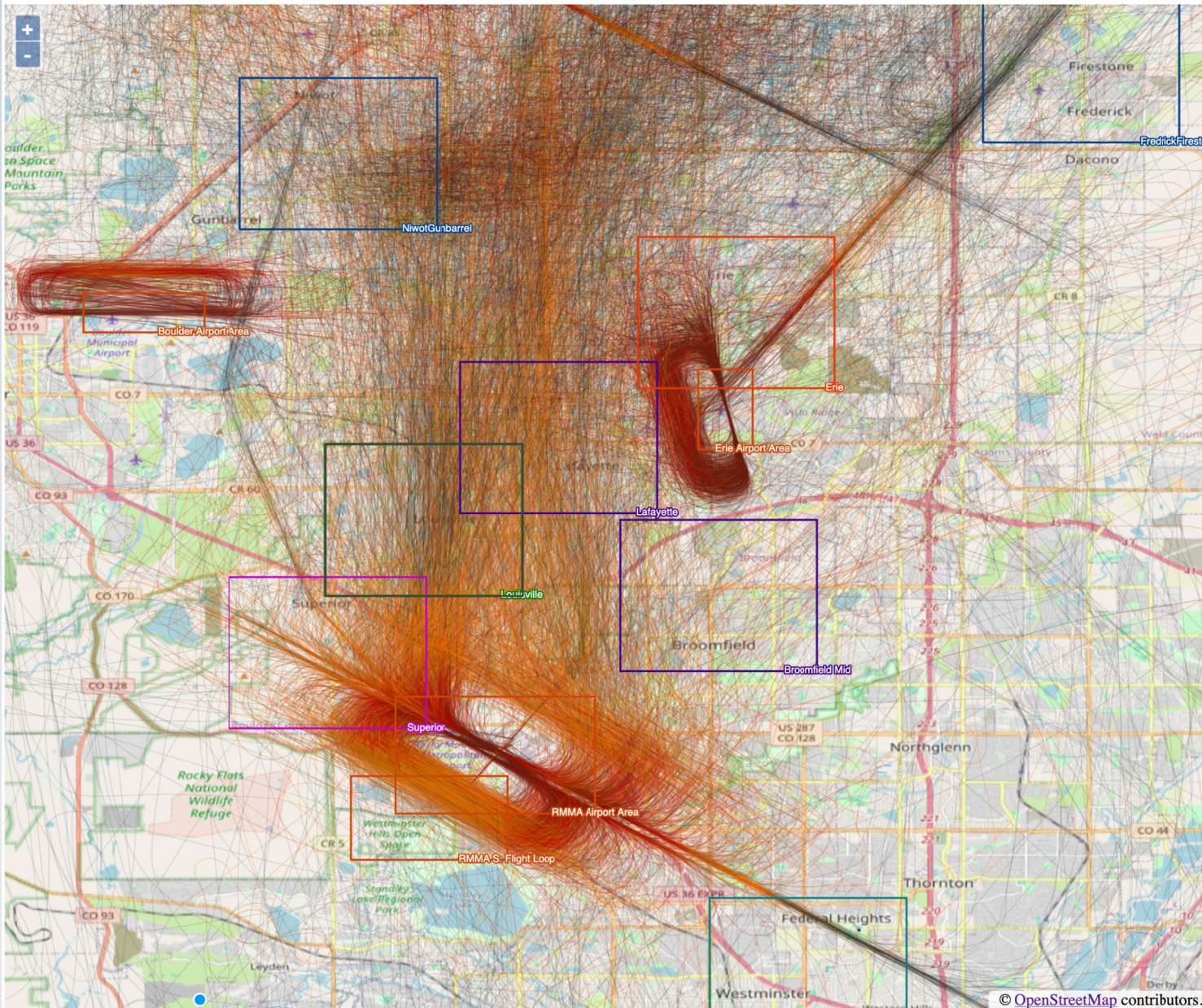


May 2020
less than 1000 ft AGL
(6600ft)

628 overpasses

RMMA Airport Area start time 12:00am start date 05/01/2020 9000ft 1000x1200
 No Selection end time 12:00pm end date 05/31/2020 5000ft submit

aircraft	local	arrivals	departures	4000-5850 ☒	6700-7000 ☐
fixed wing ☒	☒	☒	☒	5850-6100 ☒	7000-8000 ☐
jet ☒	☒	☒	☒	6100-6350 ☒	8000-9000 ☐
rotorcraft ☐	☐	☐	☐	6350-6600 ☒	9000-10000 ☐
				6600-6700 ☐	10000-100000 ☐
flights	overpasses	overpass duration	altitude	aircraft	
467	628	16:15:00	0		

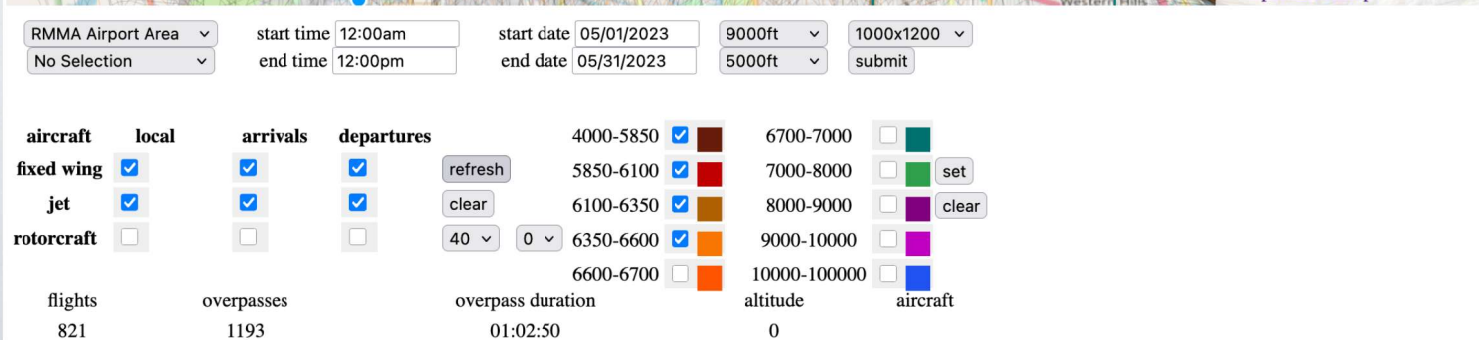


May 2021
less than 1000 ft AGL
(6600ft)

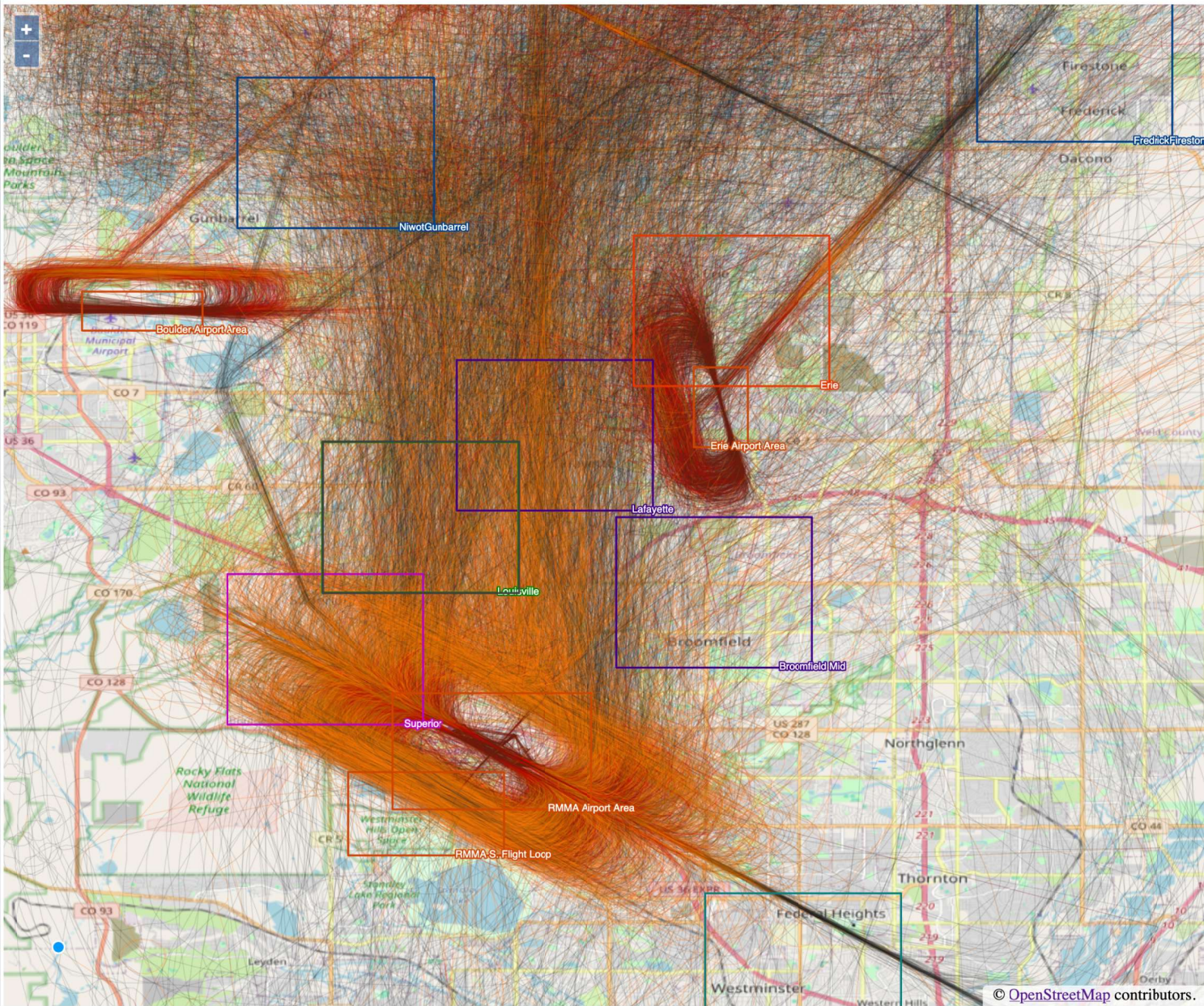
857 overpasses

RMMA Airport Area start time 12:00am start date 05/01/2021 9000ft 1000x1200
 No Selection end time 12:00pm end date 05/31/2021 5000ft submit

aircraft	local	arrivals	departures	4000-5850	6700-7000	
fixed wing	☒	☒	☒	☒	☒	set
jet	☒	☒	☒	☒	☒	clear
rotorcraft	☐	☐	☐	☐	☐	clear
flights	overpasses	overpass duration	altitude	aircraft		
594	857	00:38:30	0			



1193 overpasses

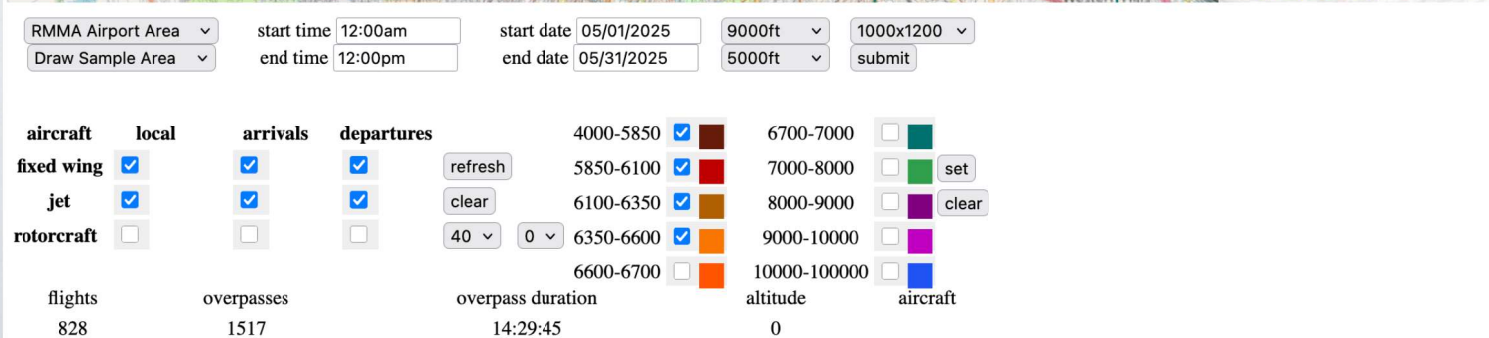


May **2024**
less than 1000 ft AGL
(6600ft)

1253 overpasses

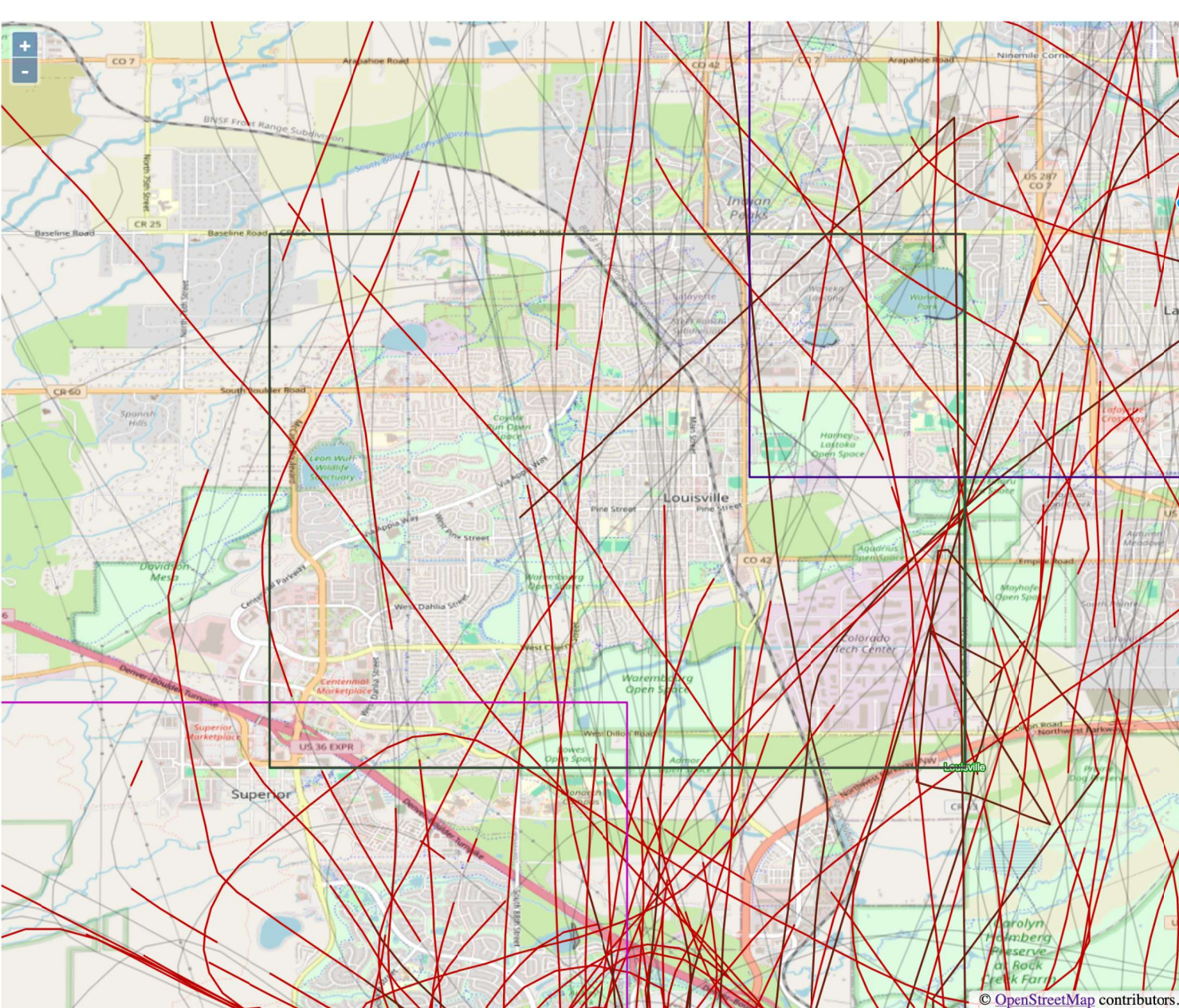
RMMA Airport Area	start time 12:00am	start date 05/01/2024	9000ft	1000x1200
No Selection	end time 12:00pm	end date 05/31/2024	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	☒	6700-7000	☐
fixed wing	☒	☒	☒	5850-6100	☒	7000-8000	☐
jet	☒	☒	☒	6100-6350	☒	8000-9000	☐
rotorcraft	☐	☐	☐	6350-6600	☒	9000-10000	☐
				6600-6700	☐	10000-100000	☐
flights	overpasses	overpass duration	altitude	aircraft			
788	1253	00:08:00	0				



1517 overpasses

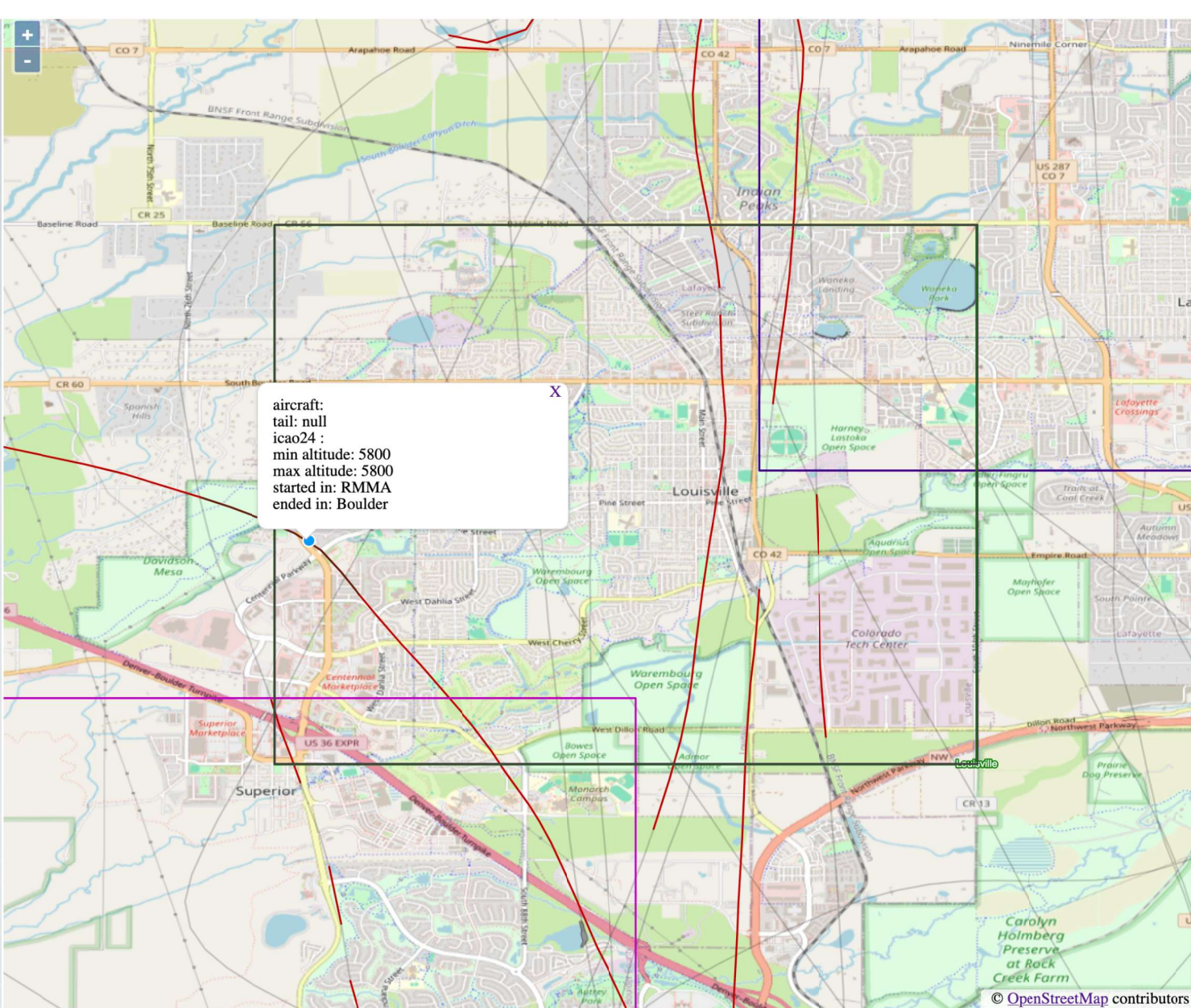
Flight overpasses over Louisville
From RMMA 2018-2025
with altitudes **less than 500 ft AGL**



May 2018
less than 500 ft AGL (6100ft)
26 overpasses

RMMA Airport Area ▼ start time 12:00am start date 05/01/2018 9000ft ▼ 1000x1200 ▼
No Selection ▼ end time 12:00pm end date 05/31/2018 5000ft ▼ submit

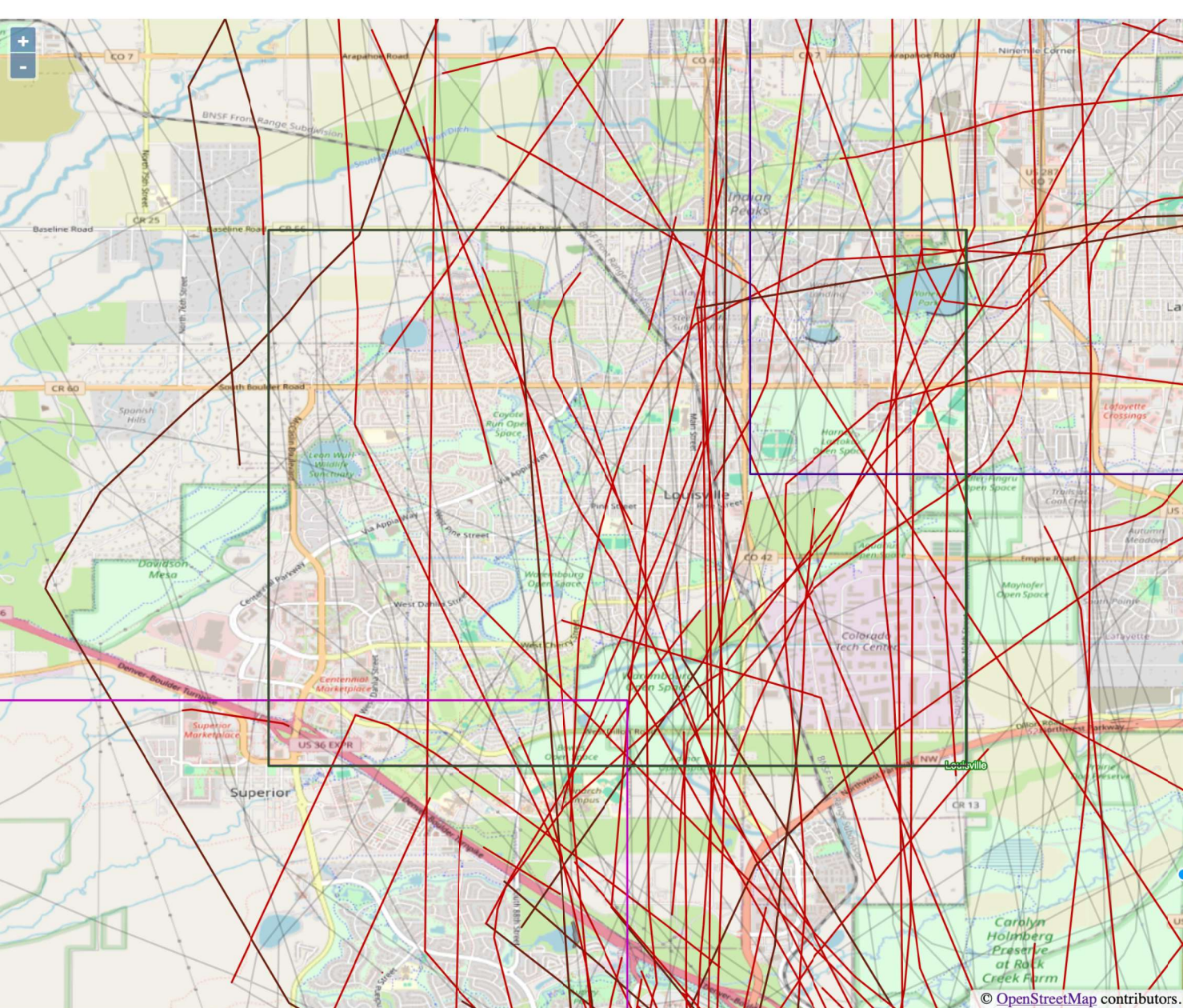
aircraft local arrivals departures
fixed wing ☒ ☒ ☒ ☒ refresh
jet ☒ ☒ ☒ clear
rotorcraft ☐ ☐ ☐ ff 2 ▼
flights 23 overpasses 26 overpass duration 07:05:15
4000-5850 ☒ 6700-7000 ☐
5850-6100 ☒ 7000-8000 ☐
6100-6350 ☐ 8000-9000 ☐
6350-6600 ☐ 9000-10000 ☐
6600-6700 ☐ 10000-100000 ☐
altitude 0 aircraft



May 2019
less than 500 ft AGL (6100ft)
5 overpasses

RMMA Airport Area	start time 12:00am	start date 05/01/2019	9000ft	1000x1200
Select Aircraft	end time 12:00pm	end date 05/31/2019	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	☒	6700-7000	☐
fixed wing	☒	☒	☒	5850-6100	☒	7000-8000	☐
jet	☒	☒	☒	6100-6350	☐	8000-9000	☐
rotorcraft	☐	☐	☐	6350-6600	☐	9000-10000	☐
flights	overpasses	overpass duration	altitude	6600-6700	☐	10000-100000	☐
5	5	00:00:10	0				

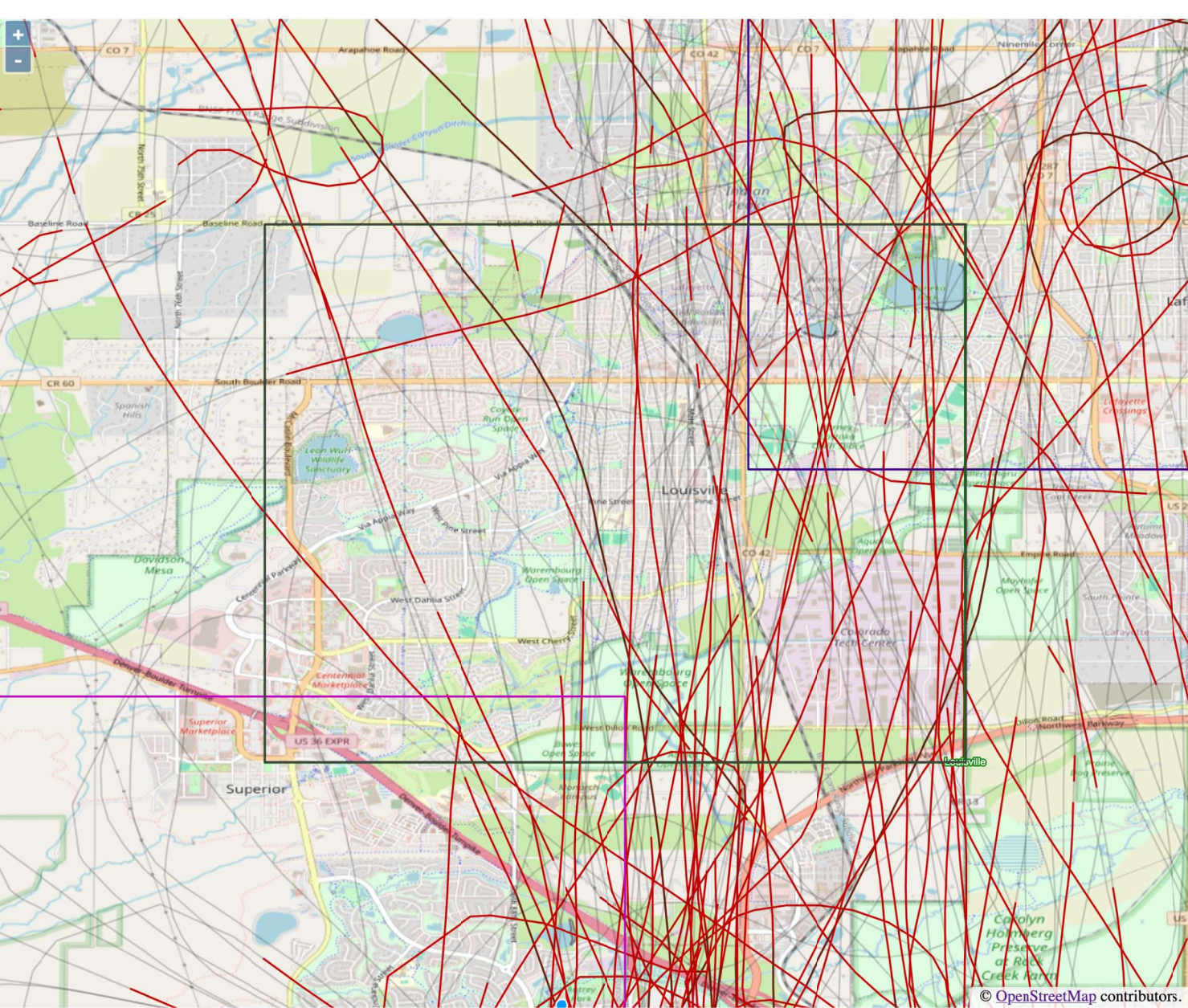


May 2020
less than 500 ft AGL (6100ft)
41 overpasses

RMMA Airport Area ▼		start time 12:00am	start date 05/01/2020	9000ft ▼	1000x1200 ▼
No Selection ▼		end time 12:00pm	end date 05/31/2020	5000ft ▼	submit

aircraft	local	arrivals	departures	4000-5850 ☒	6700-7000 ☐
fixed wing ☒	☒	☒	☒	5850-6100 ☒	7000-8000 ☐
jet ☒	☒	☒	☒	6100-6350 ☐	8000-9000 ☐
rotorcraft ☐	☐	☐	☐	6350-6600 ☐	9000-10000 ☐
				6600-6700 ☐	10000-100000 ☐

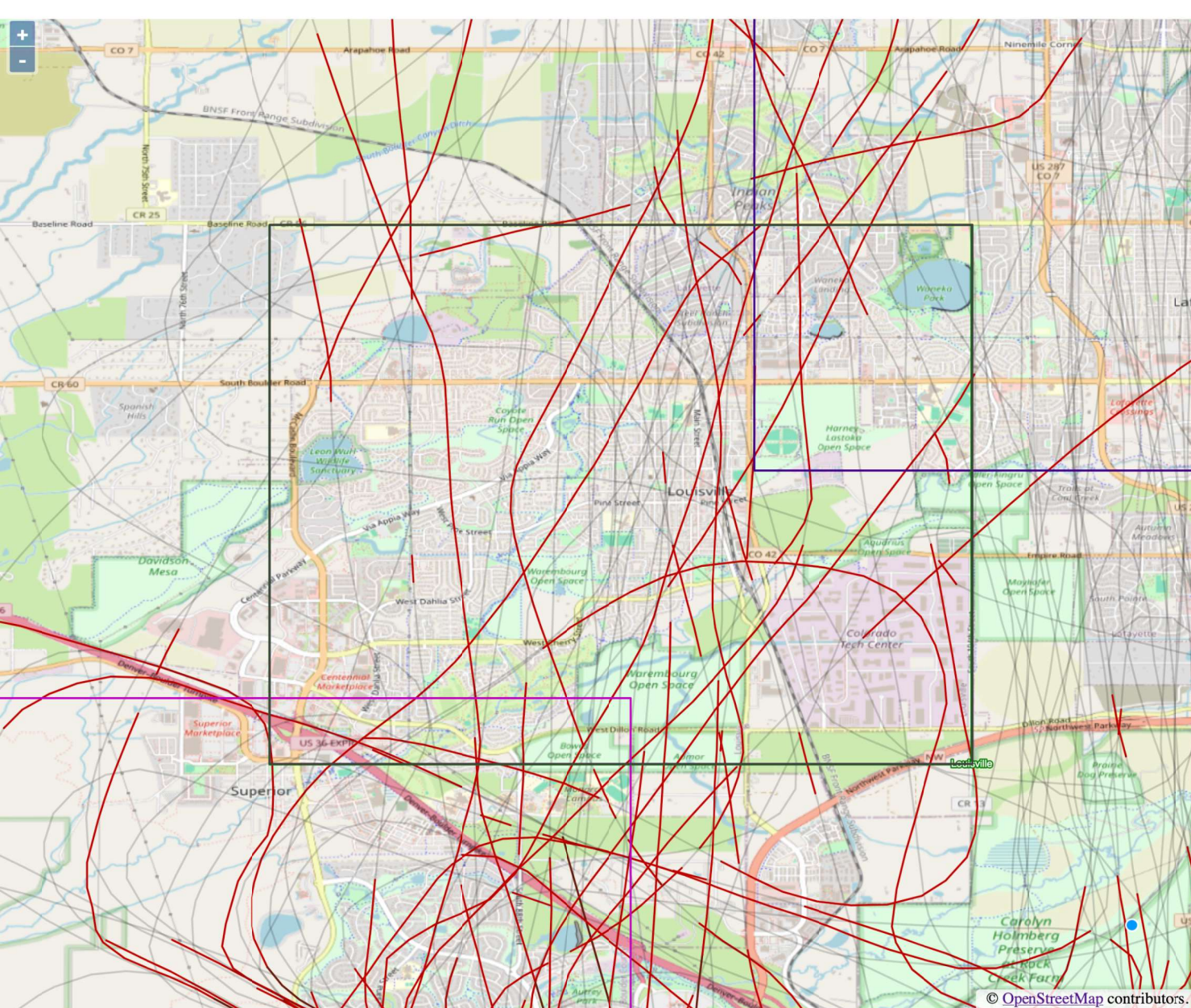
flights	overpasses	overpass duration	altitude	aircraft
38	41	00:25:50	0	



May 2021
less than 500 ft AGL (6100ft)
44 overpasses

RMMA Airport Area	start time 12:00am	start date 05/01/2021	9000ft	1000x1200
No Selection	end time 12:00pm	end date 05/31/2021	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	☒	6700-7000	☐
fixed wing	☒	☒	☒	5850-6100	☒	7000-8000	☐
jet	☒	☒	☒	6100-6350	☐	8000-9000	☐
rotorcraft	☐	☐	☐	6350-6600	☐	9000-10000	☐
				6600-6700	☐	10000-100000	☐
flights	overpasses	overpass duration	altitude	aircraft			
39	44	00:15:50	0				

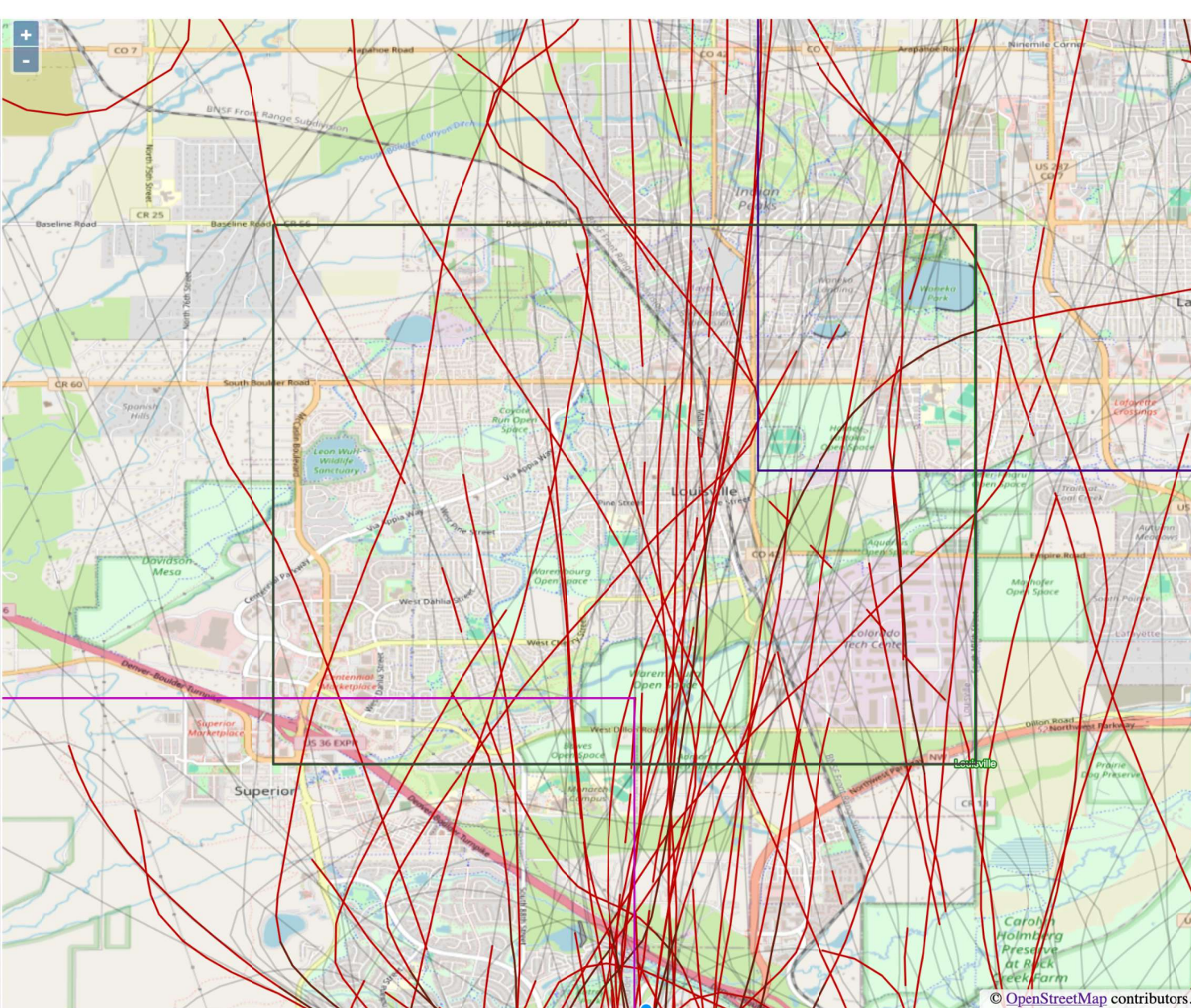


May 2022
less than 500 ft AGL (6100ft)
27 overpasses

RMMA Airport Area	start time 12:00am	start date 05/01/2022	9000ft	1000x1200
No Selection	end time 12:00pm	end date 05/31/2022	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	☒	6700-7000	☐
fixed wing	☒	☒	☒	5850-6100	☒	7000-8000	☐
jet	☒	☒	☒	6100-6350	☐	8000-9000	☐
rotorcraft	☐	☐	☐	6350-6600	☐	9000-10000	☐
				6600-6700	☐	10000-100000	☐

flights	overpasses	overpass duration	altitude	aircraft
25	27	00:07:10	0	

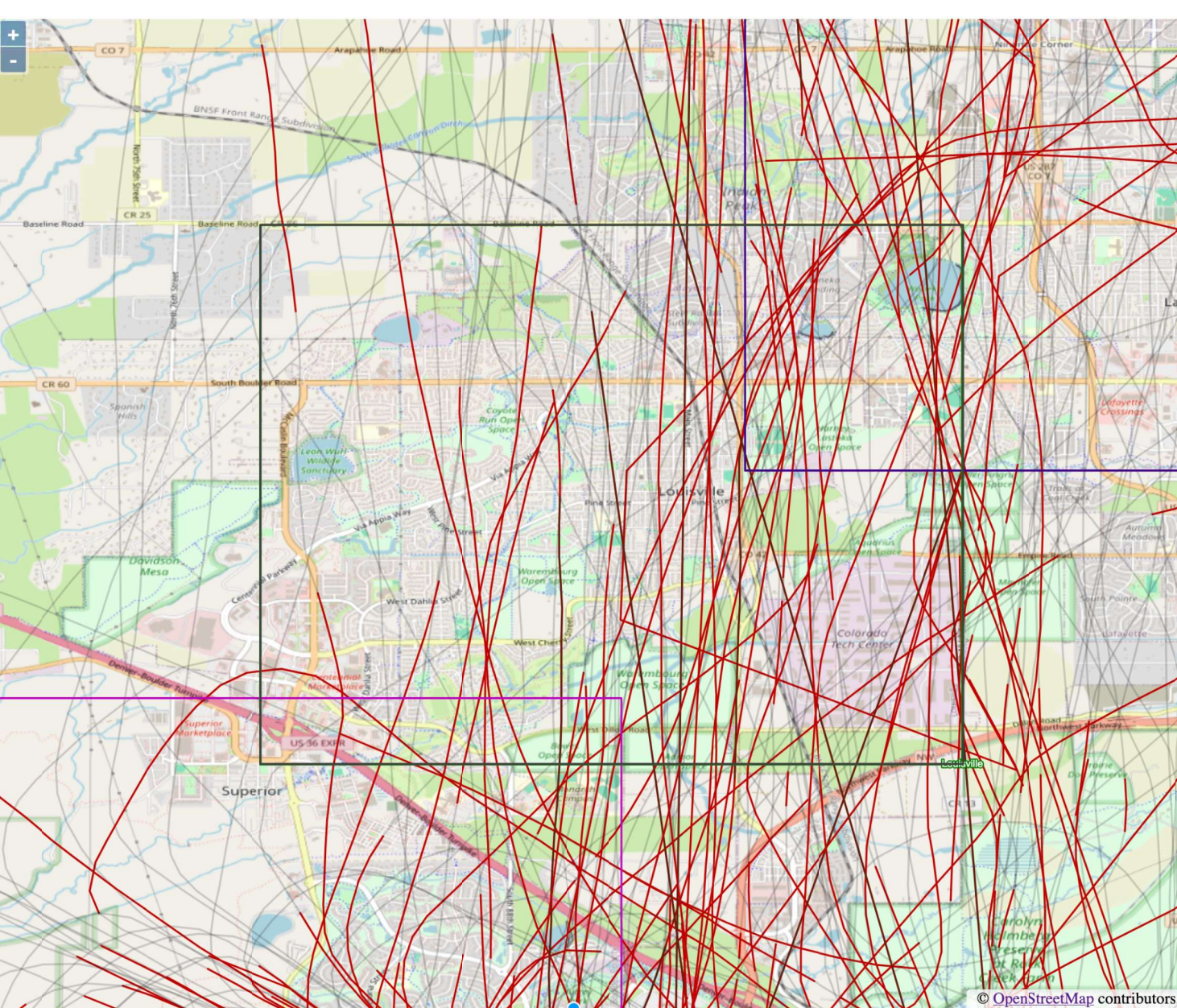


May 2023
less than 500 ft AGL (6100ft)
36 overpasses

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RMMA Airport Area	start time 12:00am	start date 05/01/2023	9000ft	1000x1200
No Selection	end time 12:00pm	end date 05/31/2023	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	☒	6700-7000	☐
fixed wing	☒	☒	☒	5850-6100	☒	7000-8000	☐
jet	☒	☒	☒	6100-6350	☐	8000-9000	☐
rotorcraft	☐	☐	☐	6350-6600	☐	9000-10000	☐
				6600-6700	☐	10000-100000	☐
flights	overpasses	overpass duration	altitude	aircraft			
34	36	00:12:15	0				



May 2024
less than 500 ft AGL (6100ft)
46 overpasses

RMMA Airport Area
 No Selection

start time end time
 start date end date

9000ft 1000x1200
 5000ft submit

aircraft	local	arrivals	departures	4000-5850 ☒	6700-7000 ☐
fixed wing ☒	☒	☒	☒	5850-6100 ☒	7000-8000 ☐
jet ☒	☒	☒	☒	6100-6350 ☐	8000-9000 ☐
propeller aircraft ☐	☐	☐	☐	6350-6600 ☐	9000-10000 ☐
				6600-6700 ☐	10000-100000 ☐

refresh clear ff 2

flights 37 overpasses 46 overpass duration 10:55:45 altitude 0 aircraft



May 2025
less than 500 ft AGL (6100ft)
141 overpasses

RMMA Airport Area	start time	12:00am	start date	05/01/2025	9000ft	1000x1200
No Selection	end time	12:00pm	end date	05/31/2025	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	☒	6700-7000	☐
fixed wing	☒	☒	☒	5850-6100	☒	7000-8000	☐
jet	☒	☒	☒	6100-6350	☐	8000-9000	☐
rotorcraft	☐	☐	☐	6350-6600	☐	9000-10000	☐
				6600-6700	☐	10000-100000	☐

refresh

clear

ff

2

overpass duration

16:26:15

altitude

0

aircraft

set

clear

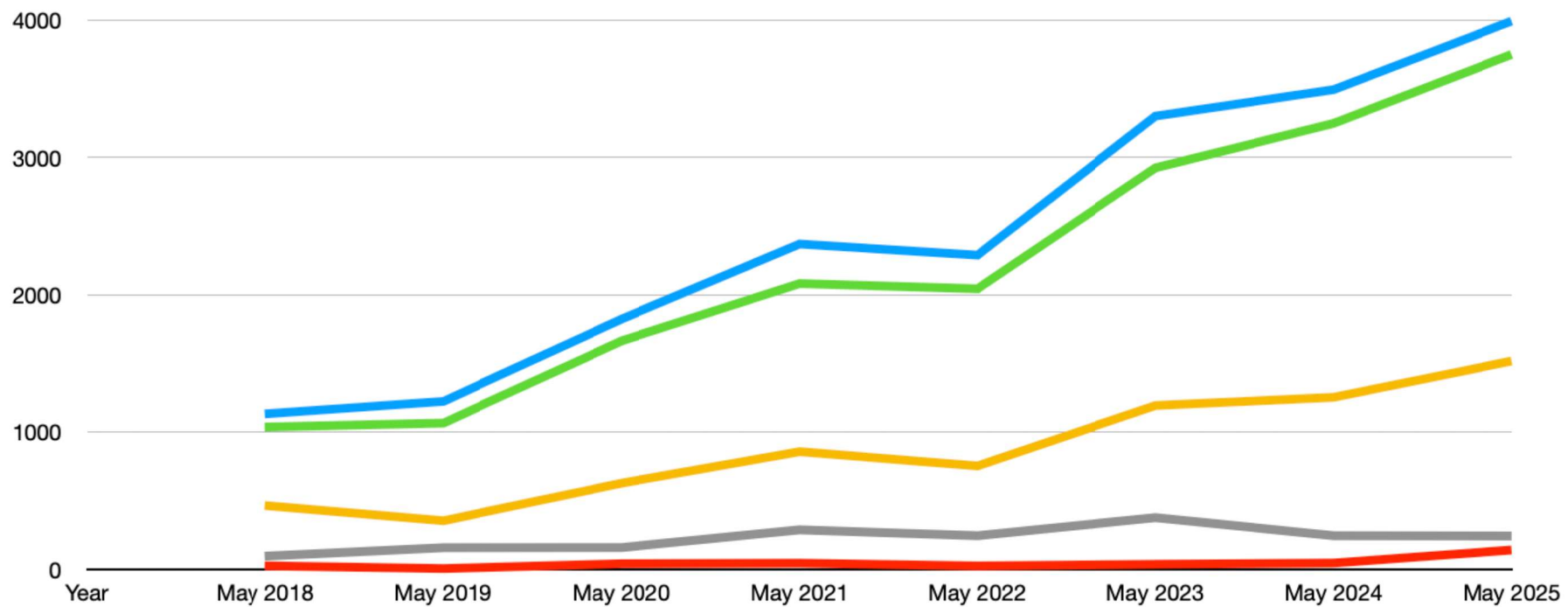
flights
103

overpasses
141

RMMA overpasses above Louisville selection area. Full Months of May

	Total Overpasses	Propeller	Jet	< 1000ft AGL	< 500ft AGL
Year					
May 2018	1132	1036	96	465	26
May 2019	1223	1065	158	354	6
May 2020	1823	1664	159	628	41
May 2021	2369	2081	288	857	45
May 2022	2288	2043	245	753	25
May 2023	3300	2923	377	1193	37
May 2024	3493	3248	245	1253	46
May 2025	3992	3749	243	1517	141

— Total Overpasses
 — Propeller
 — Jet
 — < 1000ft AGL
 — < 500ft AGL

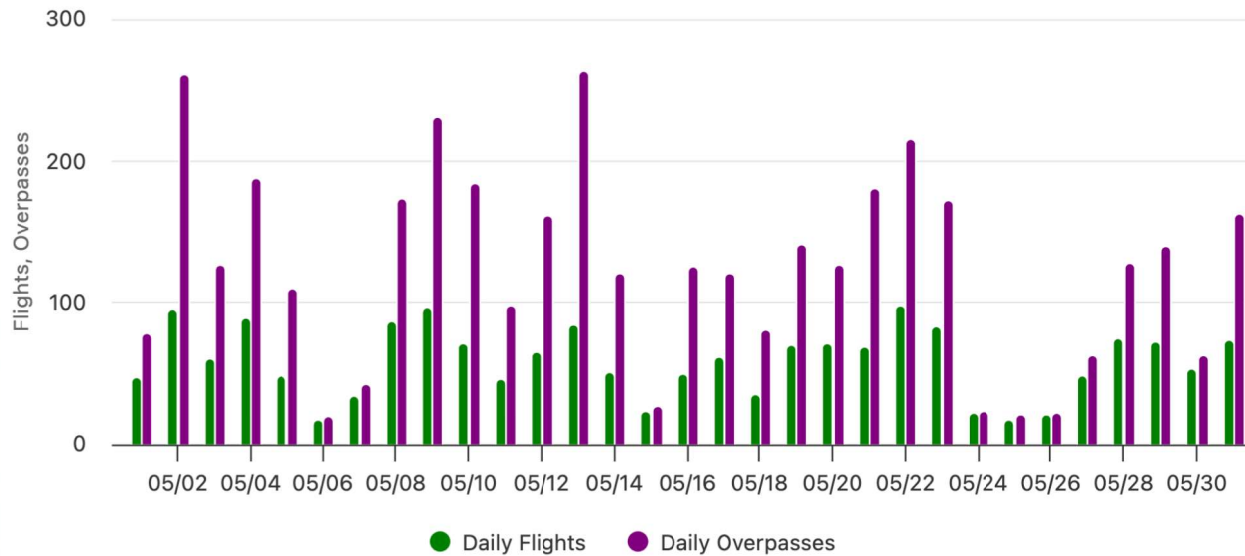


Flights in May
2018-2025

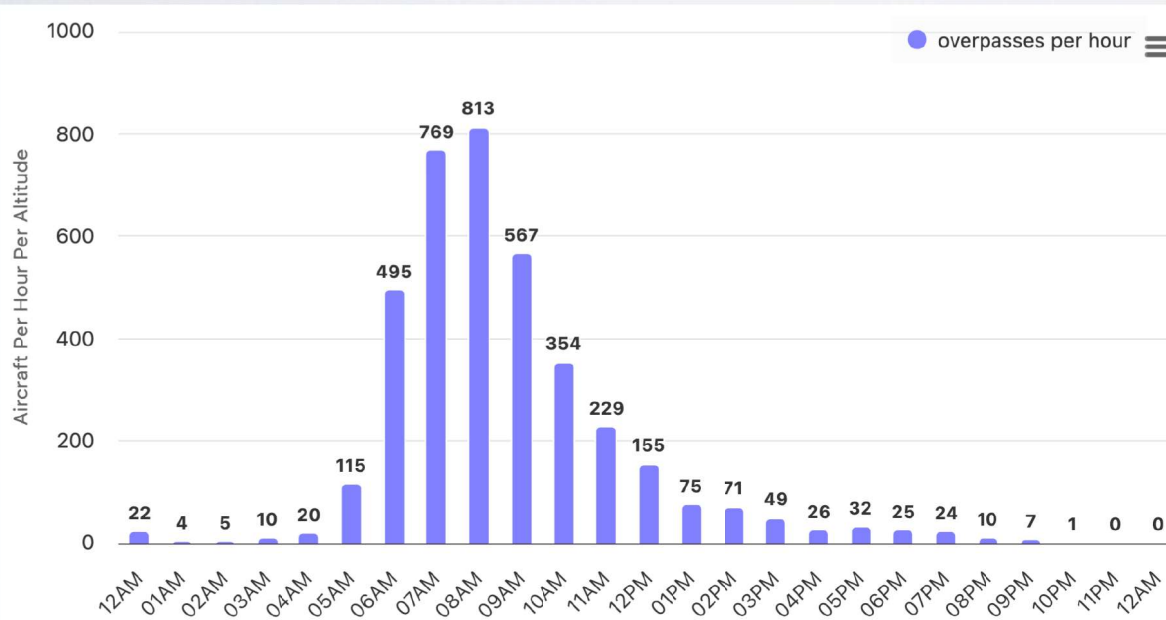
Focus on May 2025

Selection Area Data Flights/Overpasses Per Day, 05/01/2025 to 05/31/2025

Altitude range: 4000 - 100000



05/13/25 - 264 maximum one day overpasses
In the busiest 10 hours 6AM - 3PM
25 overpasses hour



Averages for all days in May

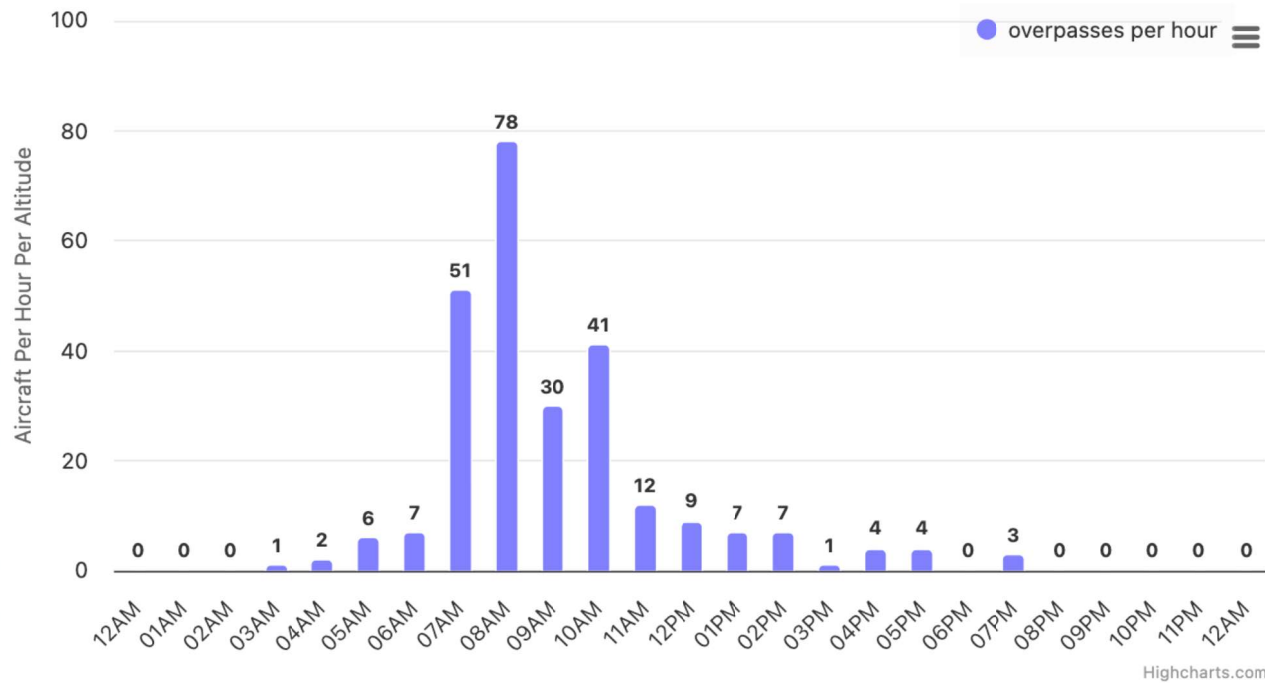
Busiest hour 8-9 AM - 813 overpasses
26.226 per hour
an overpass every 2.5 minutes

Busiest time range - 6AM - 11AM
19.3 per hour
an overpass every three minutes

Earliest time ranges
3AM-5AM one overpass per day
5AM-6AM 3.7 overpasses per hour

Late morning - Afternoons
11 - 6PM - 3.2 overpasses per hour

Focus on May 2025, busiest days 05/02 and 05/13

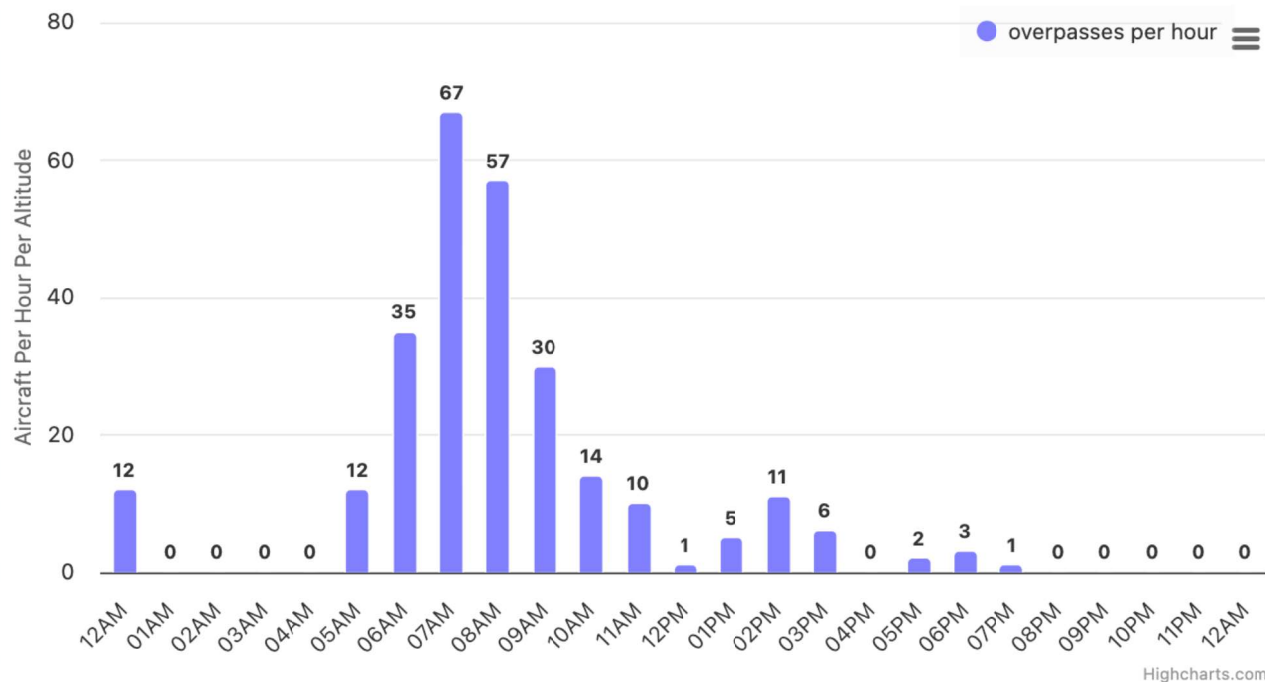


05/02/25

Early flights 7-8AM
An overpass every 70 sec

8AM-9AM peak
An overpass every 45 sec

Average of 7AM-11AM
An overpass every 72 sec



05/13/25

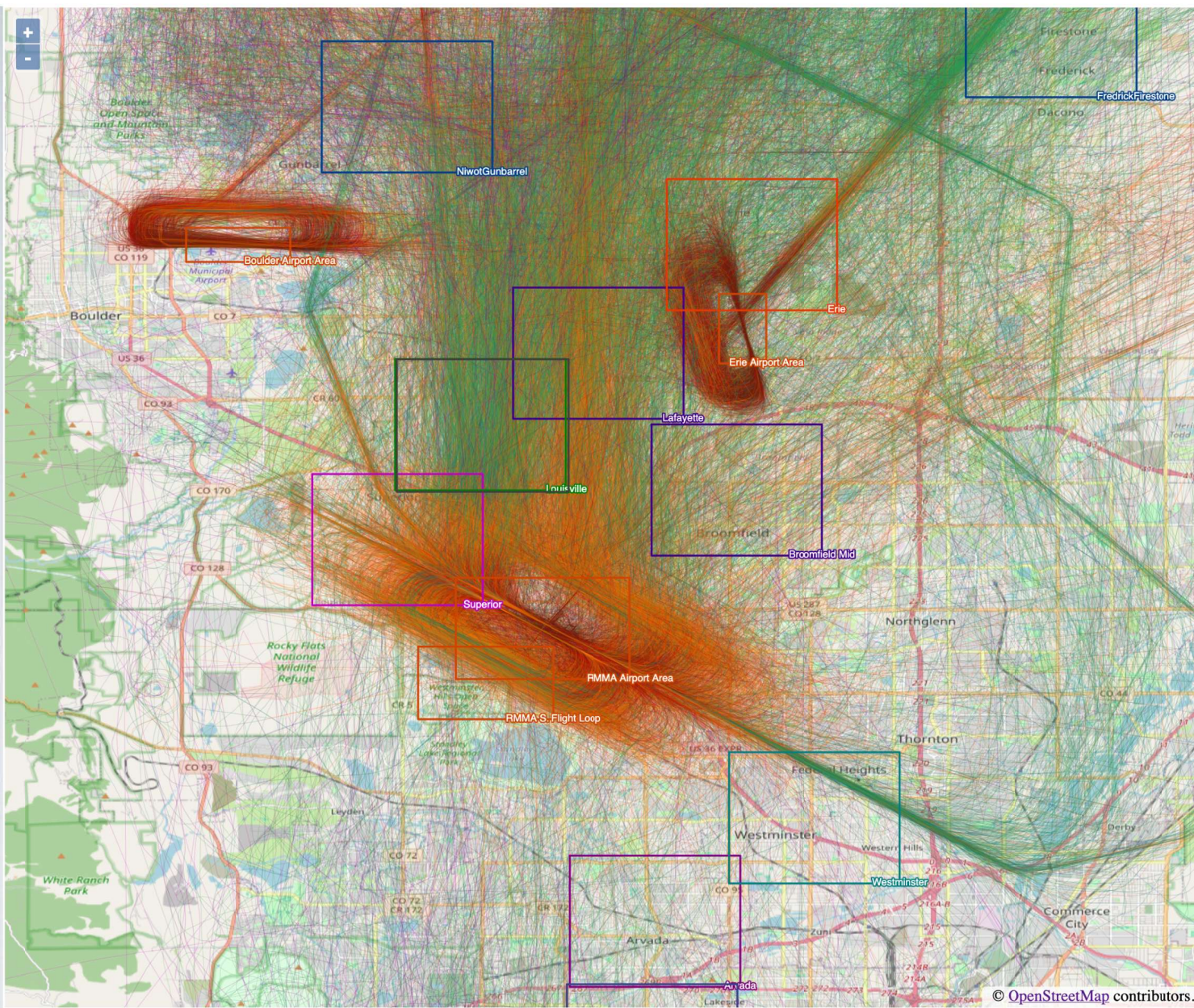
7AM-8AM (one hour earlier)
One overpass every 53 seconds

Average 6AM-10AM (one hour earlier)
An overpass every 78 sec

Early flights

6-7AM
An overpass every 1.7 minutes (102 sec)
5-6AM
An overpass every 5 minutes

Propeller Flight overpasses over Louisville
(Large fraction are flight schools)
From/To RMMA
Month of April to September 2025



Propeller Flights April 2025

RMMA Airport Area

No Selection

start time

12:00am

end time

12:00pm

start date

04/01/2025

end date

04/30/2025

9000ft

5000ft

1000x1200

submit

aircraft

local

arrivals

departures

refresh

clear

40

0

fixed wing

jet

rotorcraft

4000-5850

5850-6100

6100-6350

6350-6600

6600-6700

6700-7000

7000-8000

8000-9000

9000-10000

10000-100000

flights

1478

overpasses

3121

overpass duration

13:02:30

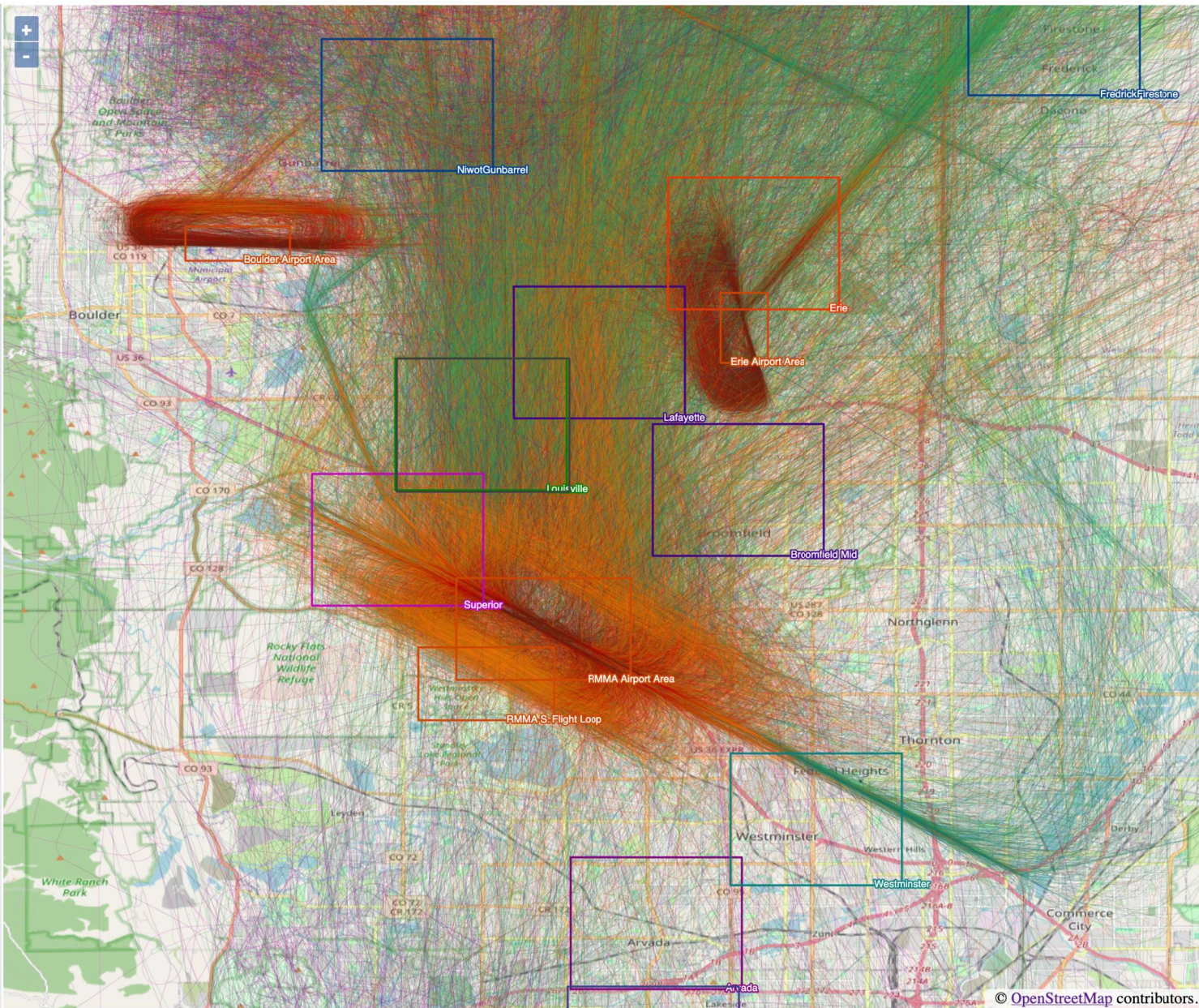
altitude

0

aircraft

set

clear



Propeller Flights May 2025

RMAA Airport Area
 No Selection

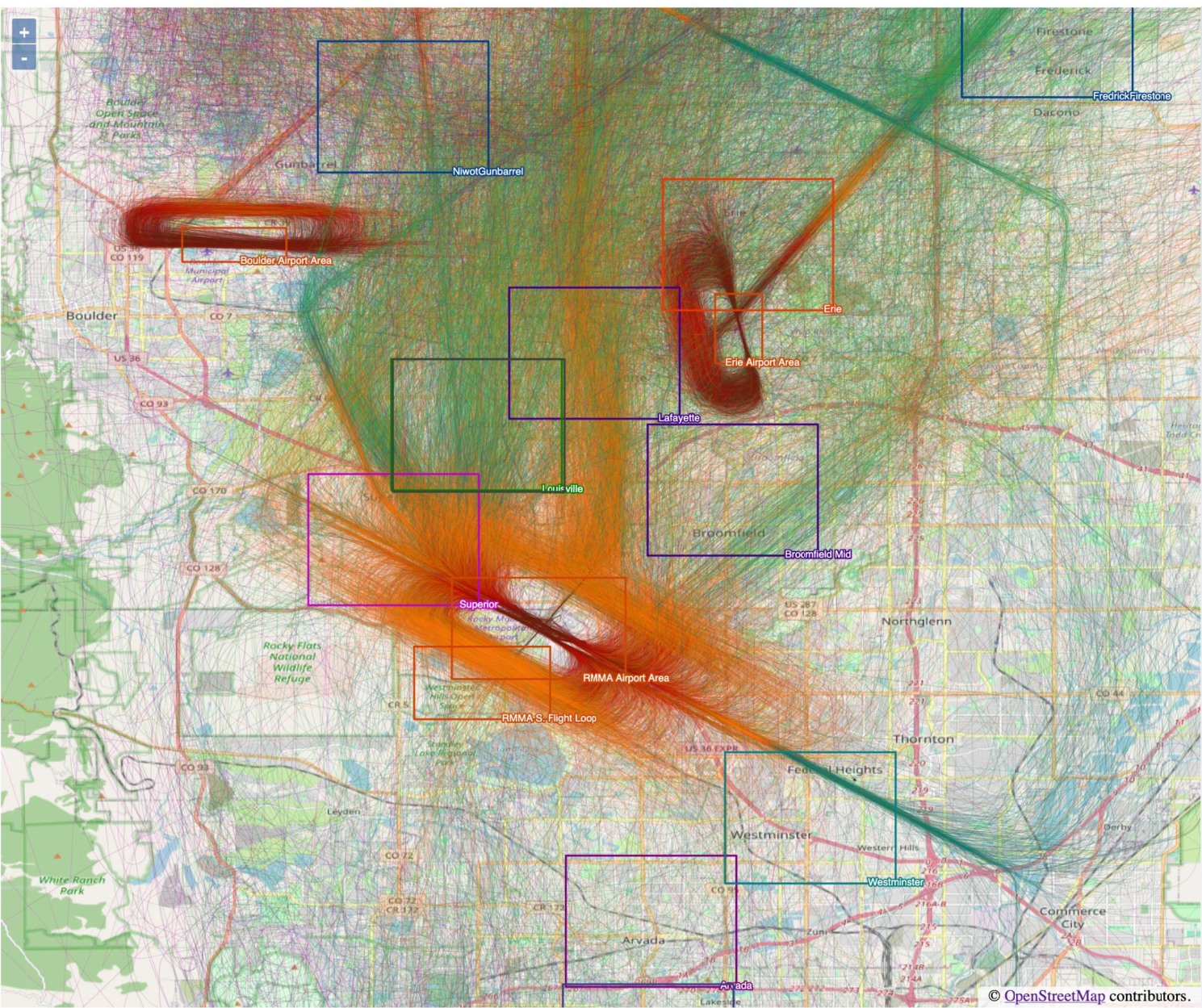
start time start date
 end time end date

9000ft 1000x1200
 5000ft submit

aircraft	local	arrivals	departures	4000-5850	6700-7000
fixed wing	☒	☒	☒	☒	☒
jet	☐	☐	☐	☒	☒
rotorcraft	☐	☐	☐	☒	☒

refresh clear 40 0 6350-6600 6600-6700 6700-7000 7000-8000 8000-9000 9000-10000 10000-100000

flights 1626 overpasses 3800 overpass duration 20:49:55 altitude 0 aircraft



Propeller Flights June 2025

RMMA Airport Area

No Selection

start time

12:00am

start date

06/01/2025

9000ft

1000x1200

end time

12:00pm

end date

06/30/2025

5000ft

submit

aircraft

local

arrivals

departures

fixed wing

jet

rotorcraft

flights

overpasses

overpass duration

altitude

1607

2800

09:41:45

0

refresh

clear

40

0

4000-5850

5850-6100

6100-6350

6350-6600

6600-6700

6700-7000

7000-8000

8000-9000

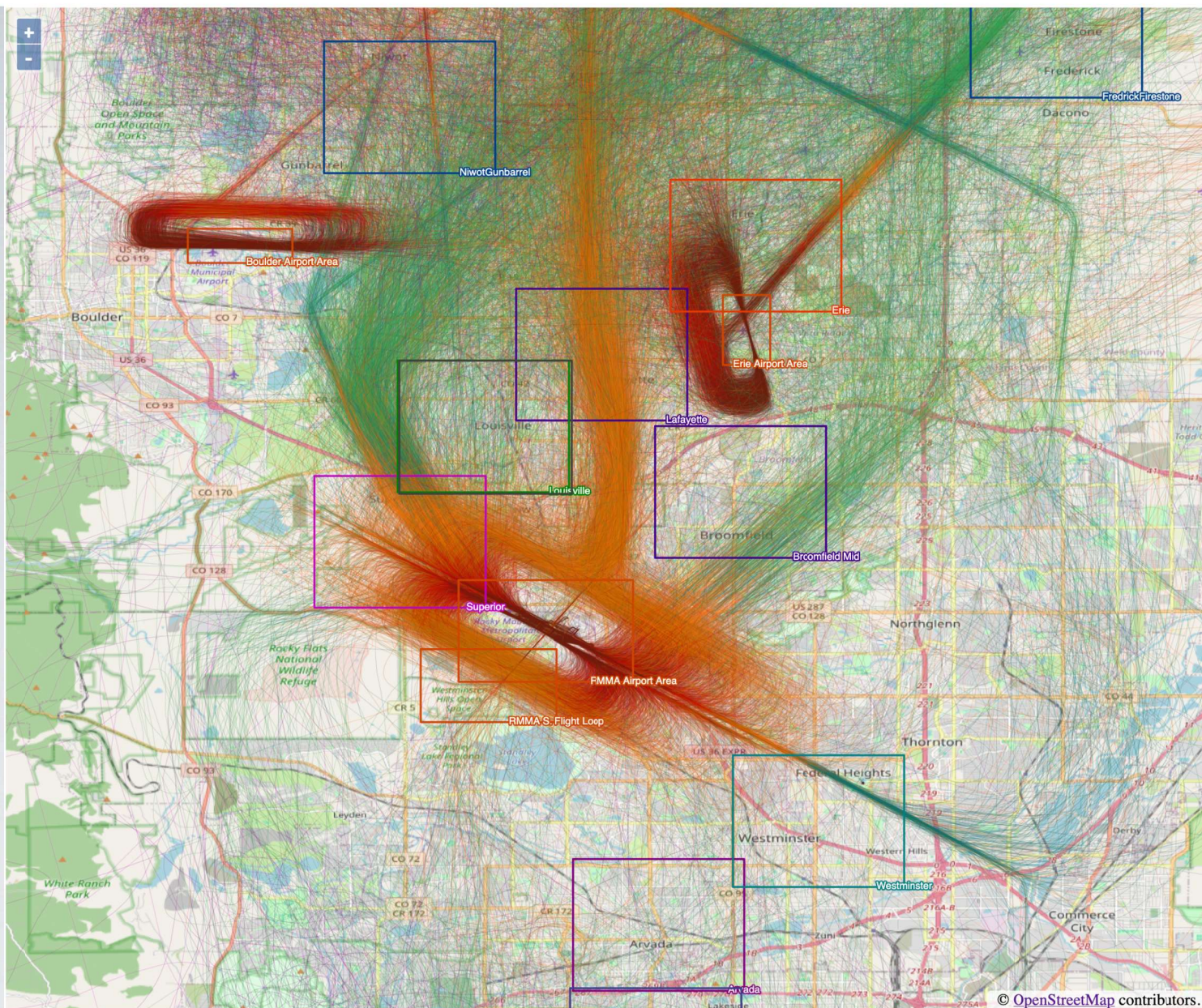
9000-10000

10000-100000

set

clear

aircraft



Propeller Flights July 2025

RMMA Airport Area
 No Selection

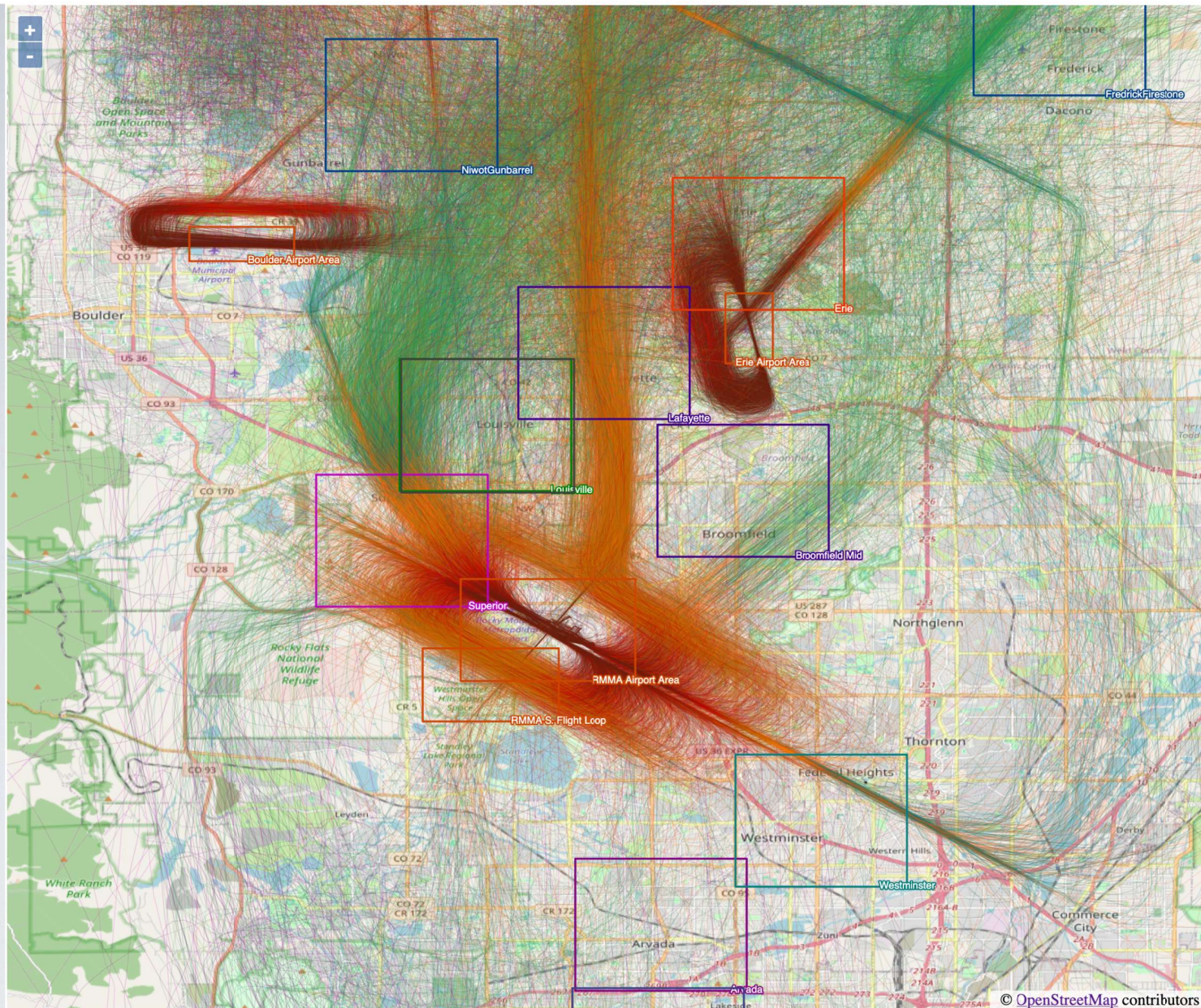
start time 12:00am
 end time 12:00pm

start date 07/01/2025
 end date 07/31/2025

9000ft
 5000ft

1000x1200
 submit

aircraft	local	arrivals	departures	4000-5850 ☒	6700-7000 ☒
fixed wing ☒	☒	☒	☒	5850-6100 ☒	7000-8000 ☒
jet ☐	☐	☐	☐	6100-6350 ☒	8000-9000 ☒
rotorcraft ☐	☐	☐	☐	6350-6600 ☒	9000-10000 ☒
flights	overpasses	overpass duration	altitude	10000-100000 ☒	aircraft
1464	2249	13:46:20	0		



Propeller Flights August 2025

RMMA Airport Area

No Selection

start time

12:00am

start date

08/01/2025

9000ft

1000x1200

end time

12:00pm

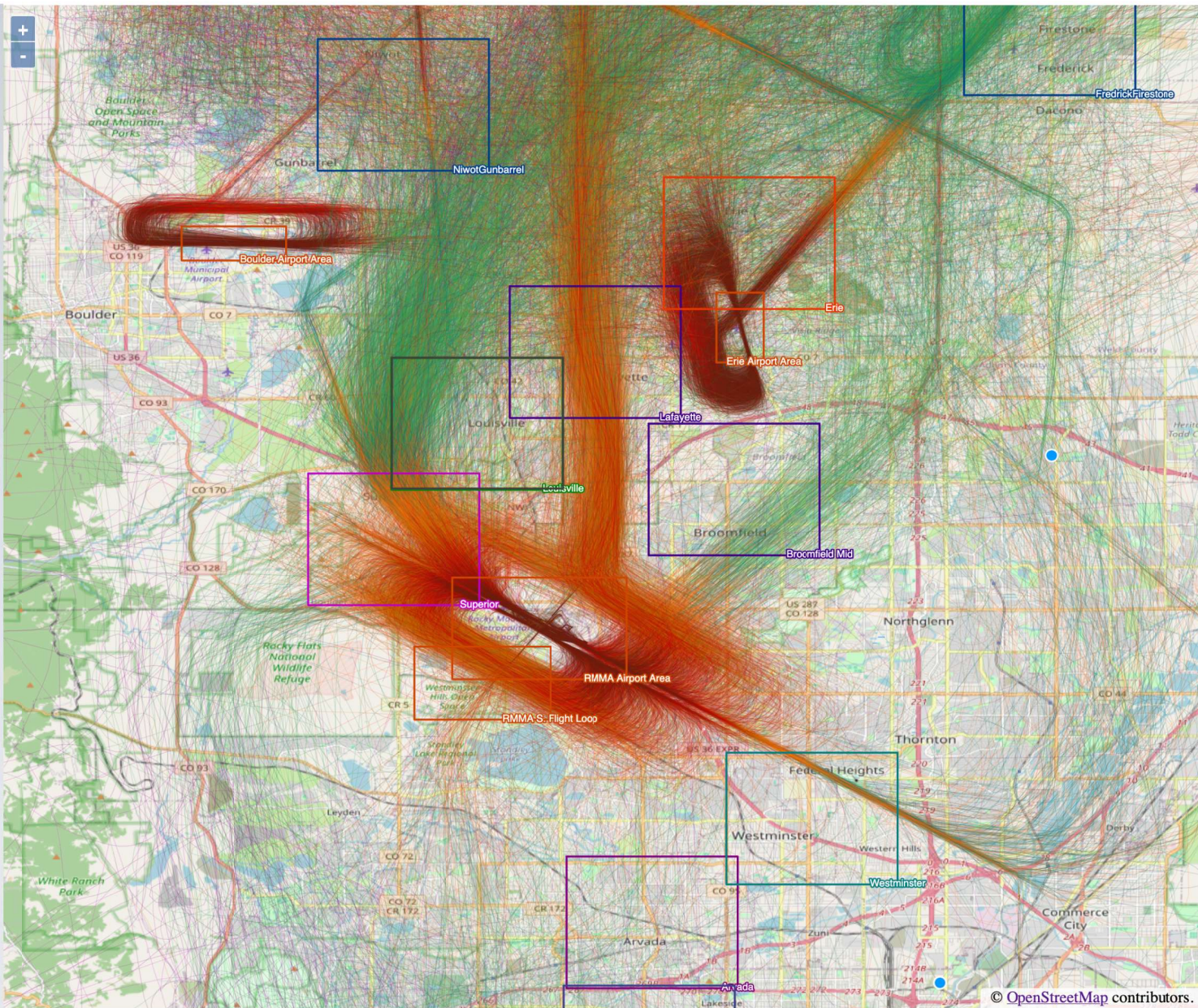
end date

08/31/2025

5000ft

submit

aircraft	local	arrivals	departures				
fixed wing	☒	☒	☒	refresh	4000-5850	☒	6700-7000
jet	☐	☐	☐	clear	5850-6100	☒	7000-8000
rotorcraft	☐	☐	☐	40	6100-6350	☒	8000-9000
				0	6350-6600	☒	9000-10000
					6600-6700	☒	10000-100000
flights	overpasses	overpass duration	altitude				aircraft
1521	2522	23:19:50	0				



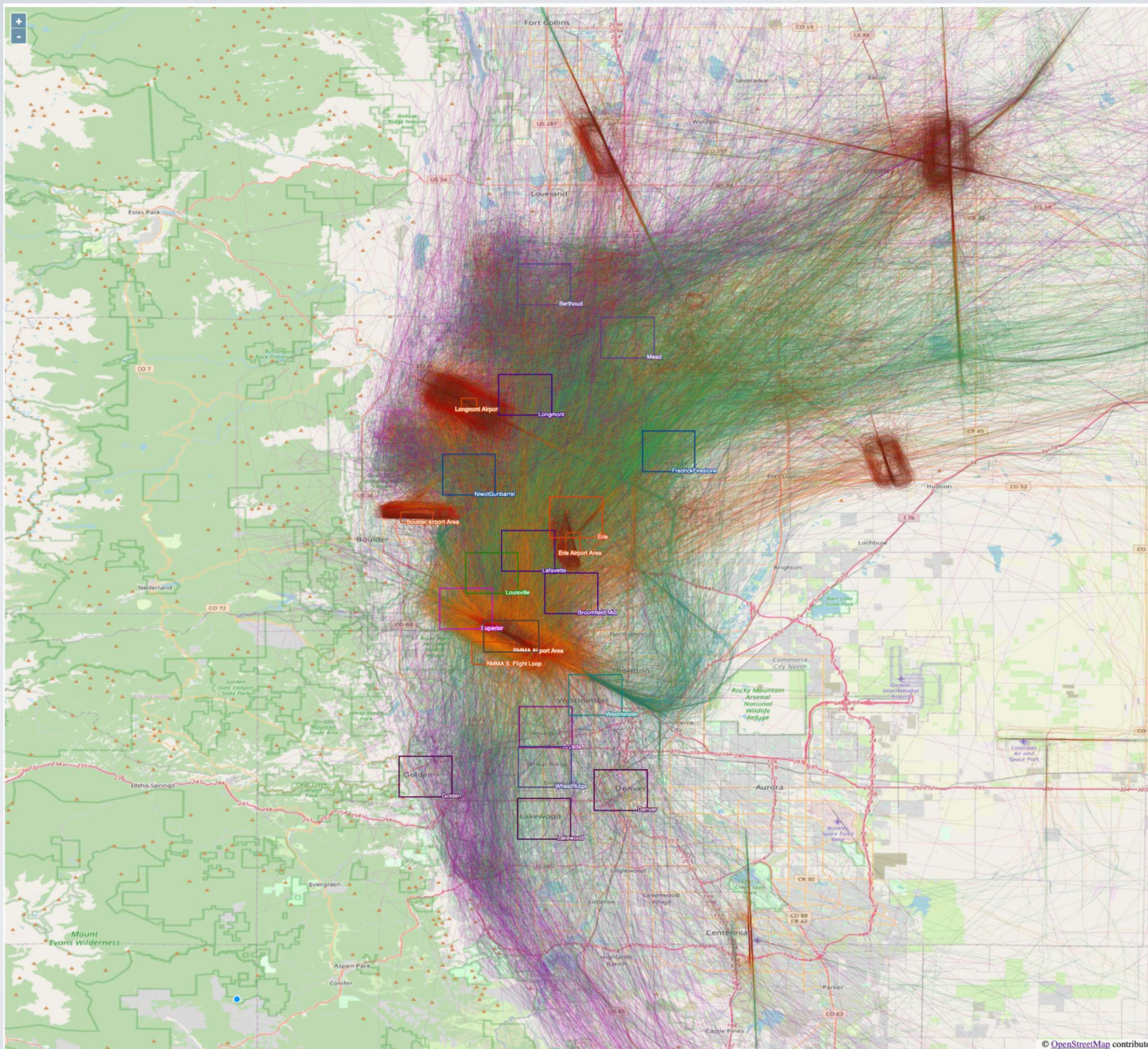
Propeller Flights September 2025

RMMA Airport Area	start time 12:00am	start date 09/01/2025	9000ft	1000x1200
Draw Sample Area	end time 12:00pm	end date 09/30/2025	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	☒	6700-7000	☒
fixed wing	☒	☒	☒	5850-6100	☒	7000-8000	☒
jet	☐	☐	☐	6100-6350	☒	8000-9000	☒
rotorcraft	☐	☐	☐	6350-6600	☒	9000-10000	☒
flights	overpasses	overpass duration	altitude	6600-6700	☒	10000-100000	☒
1437	2485	22:22:00	0				

Questions?

THANK YOU!



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RMMA Airport Area	start time 12:00am	start date 05/01/2025	9000ft	1800x2000
No Selection	end time 12:00pm	end date 05/31/2025	5000ft	submit

aircraft	local	arrivals	departures	4000-5850	6700-7000
fixed wing	☒	☒	☒	5850-6100	7000-8000
			refresh		set