

Brown Aviation Strategies

Research Report No. 001

Longmont Airport Noise Town Hall

Understanding FAA Authority, Local Government Responsibilities, and Community Expectations

Version 1.0 | July 30, 2026

Airport-community conflict cannot be addressed effectively through isolated noise procedures. It requires an integrated system of FAA-informed governance, measurable performance, transparent communication, technical expertise, financial capacity, and continuous community engagement.

About Brown Aviation Strategies

Brown Aviation Strategies (BAS) is an independent aviation research and strategy institute. BAS develops FAA-informed, accessible resources for airports, municipalities, transportation agencies, elected officials, and community stakeholders.

This report is educational research. It does not provide legal advice, make findings on behalf of the City of Longmont, or advocate for a particular airport restriction, fee, or development outcome.

Evidence Categories Used in This Report

Label	Meaning
Meeting record	A statement made during the July 27 Town Hall or July 28 Council meeting
Consultant finding	A finding or measurement contained in a consultant report
Council direction	A motion approved by the City Council
Verified authority	A statute, regulation, grant assurance, FAA order, or judicial decision independently reviewed by BAS
Public comment	A stakeholder statement presented to Council; not independently verified unless otherwise noted
BAS analysis	Brown Aviation Strategies' interpretation of the combined record

These labels are not interchangeable. A presenter's explanation is evidence of what was communicated at the meeting. It becomes a verified legal proposition only when supported by the underlying authority.

Executive Summary

On July 27, 2026, the City of Longmont held a public Town Hall addressing what the City can and cannot do about aircraft noise associated with Vance Brand Municipal Airport. John Putnam of Kaplan Kirsch, serving as special airport counsel, explained the federal framework governing airspace, aircraft operations, airport access, federal grant obligations, and local airport-proprietor responsibilities. The presentation was followed by extensive community questions reflecting frustration, uncertainty, and a strong desire for effective local action.

The Town Hall demonstrated a recurring problem in airport-community relations: residents often experience aircraft noise as an immediate local impact, while the authority governing aircraft operation is distributed across federal law, FAA policy, airport-sponsor obligations, local land-use powers, and the limited authority of an airport proprietor. That division can create an expectation gap. Community members may expect a city to prohibit an operation, impose a curfew, limit touch-and-go activity, or direct flight paths. Federal law and grant obligations may significantly constrain those actions, particularly when they operate as mandatory access or noise restrictions.

The federal framework does not leave municipalities without responsibility. Airport sponsors remain responsible for managing airport property, providing access on reasonable and nondiscriminatory terms, maintaining safe and efficient facilities, managing leases and revenue, coordinating compatible land use, communicating with airport users, and making evidence-based decisions within their legal authority. Federal preemption therefore does not mean local government has no role. It means the local role must be accurately defined.

One day after the Town Hall, the Longmont City Council considered two consultant studies that moved the discussion from legal authority toward implementation. Airport Monitoring Systems (AMS) presented a baseline assessment of Longmont's Voluntary Noise Abatement Program (VNAP). AMS described the program as broad and unusually comprehensive for a general aviation airport while recommending stronger performance measurement, operator engagement, complaint management, technical analysis, and public reporting.

AMS reported two initial 2025 indicators: approximately 88 percent of **total 2025 operations** occurred within the preferred 8:00 a.m.–8:00 p.m. window, and approximately 65 percent of total operations used Runway 29, the preferred runway. The written AMS report controls this wording. Oral discussion at the meeting sometimes characterized the 88 percent figure more narrowly as training or touch-and-go activity; the written report does not support that narrower description. AMS also explained that comprehensive flight-path, altitude, pattern, and operator-specific conformance could not yet be quantified without sustained analysis.

This distinction supports a major BAS finding:

A comprehensive voluntary noise-abatement program is not necessarily effective unless its objectives, conformance, and outcomes are measurable.

Council unanimously directed the City Manager to return by the end of the third quarter of 2026 with options for implementing the AMS recommendations. Those options are to address data collection, a technical advisory group, operator-specific analytics, measurable success targets, complaint tracking,

resident feedback, and regular public reporting. A second motion, approved 6–1, directed the City to begin improving communications through AWOS, the airport website, and third-party aviation platforms.

Bolton & Menk then presented a rates-and-charges study addressing leases, revenue, development, landing-fee scenarios, reserves, and capital capacity. During the discussion, City budget staff orally corrected the study’s published working-capital forecast, explaining that the original calculation duplicated carryover and that a corrected projection declined but did not become negative within the five-year period. As of this Day 8 audit, BAS has not obtained a corrected exhibit or adopted minutes. The oral correction is therefore reported as a statement made at the meeting, not as an independently verified replacement forecast.

BAS analysis. If confirmed in a corrected exhibit, the correction would change the severity and timing of the published forecast but would not by itself answer the separate capital-capacity question. The airport still must maintain assets, fund local grant matches, support operations, plan development, and fund any expanded noise-management program.

Council approved a third direction, 4–3, requesting an “all-of-the-above” financial-sustainability package. The requested package includes lease and hangar rates, tiedown charges, fuel-flowage fees, lease escalators, minimum standards, development opportunities, and \$3-per-1,000-pound landing-fee models for based and non-based aircraft. The motion did not enact a landing fee or approve a final rates-and-charges schedule.

Together, the two meetings illustrate that airport-community conflict is not simply a dispute over noise. It is a systems problem involving:

- federal and local authority;
- airport-sponsor governance;
- voluntary operator behavior;
- objective operational data;
- community experience;
- communications and trust;
- staff and technical capacity;
- financial sustainability; and
- long-term land-use and airport planning.

The principal lesson for Colorado airports is that isolated procedures are unlikely to resolve a complex conflict. Credible airport governance requires a continuous cycle: define the issue, identify authority, establish a baseline, select measures, evaluate conformance, test outcomes, disclose limitations, engage stakeholders, and adjust.

1. Meeting Overview

1.1 Date, purpose, and presenter

Meeting record. The City held the Airport Noise Town Hall on July 27, 2026, at the Longmont Museum. The stated purpose was to help the public understand the City’s legal authority and limitations regarding aircraft noise at Vance Brand Municipal Airport.

The presentation was delivered by John Putnam of Kaplan Kirsch, the City’s special counsel on airport matters. The session included a prepared presentation followed by community questions and answers.

1.2 Nature of the meeting

The Town Hall was educational rather than legislative. It did not adopt an ordinance, direct staff, amend airport procedures, or decide a pending legal case. Its value was explanatory: it placed community concerns within the federal legal and policy structure applicable to a federally obligated public-use airport.

1.3 Audience observations

BAS observation. The community questions revealed several recurring expectations:

- the City should be able to regulate operations occurring at a City-owned airport;
- ownership of the airport should include authority to limit touch-and-go operations;
- local elected officials should be able to establish enforceable quiet hours;
- complaint volume should justify operational restrictions;
- landing fees might be used to reduce repetitive training activity;
- voluntary procedures are insufficient when some operators do not participate; and
- federal funding may appear to limit local control.

These expectations are understandable because the impacts are experienced locally and the airport is municipally owned. The legal authority governing flight, however, does not follow a simple ownership model.

2. FAA Legal Framework Presented

2.1 Federal sovereignty and preemption

Verified authority. Federal law states that the United States Government has exclusive sovereignty over U.S. airspace. The FAA Administrator develops plans and policy for use of navigable airspace and prescribes air-traffic regulations governing aircraft flight, including safe altitudes.

In *City of Burbank v. Lockheed Air Terminal, Inc.*, the U.S. Supreme Court held that the pervasive federal framework preempted a municipal police-power curfew on jet departures. The case remains central to aircraft-noise preemption analysis.

The correct citation is *City of Burbank v. Lockheed Air Terminal, Inc.*, 411 U.S. 624 (1973). The Town Hall slide’s abbreviated or inverted 1972 reference should not be repeated as the controlling citation.

Federal preemption is substantial, but it should not be summarized as eliminating every airport-proprietor action. Courts and FAA policy recognize a limited proprietor role, subject to federal statutory, regulatory, grant-assurance, and constitutional constraints.

2.2 FAA authority and airport operations

The FAA exercises extensive authority over:

- navigable airspace;
- air-traffic rules;
- aircraft certification;
- pilot certification;
- flight procedures;
- safe altitudes;
- air-traffic control; and
- the national aviation system.

At a non-towered airport, pilots make operational decisions under federal rules, traffic-pattern practices, weather, aircraft performance, safety considerations, and voluntary local guidance. Municipal ownership does not convert those decisions into ordinary local traffic regulation.

2.3 Airport-sponsor responsibilities

Longmont is an airport sponsor that has accepted federal airport assistance. Its responsibilities include the commitments contained in the applicable grant assurances.

Grant Assurance 22 — Economic Nondiscrimination. A sponsor must make the airport available for public use on reasonable terms and without unjust discrimination among aeronautical activities. The assurance permits reasonable, nondiscriminatory conditions necessary for safe and efficient operation and certain limitations needed for safe operation or the civil-aviation needs of the public.

This is not a rule that prohibits every limitation. It requires evidence, consistency, a lawful purpose, and analysis of discrimination and access.

Grant Assurance 21 — Compatible Land Use. A sponsor must take reasonable action, including zoning where available, to promote compatible land use near the airport. Actual municipal authority depends on Colorado law, jurisdictional boundaries, and the location of development.

Grant Assurance 24 — Fee and Rental Structure. A sponsor must maintain a fee and rental structure that makes the airport as self-sustaining as possible under the circumstances at that airport. This does not categorically require landing fees or full cost recovery from every operation.

Grant Assurance 25 — Airport Revenues. Airport revenue is subject to restrictions governing its use. Airport-generated funds are not ordinary general municipal revenue available for unrelated services.

2.4 FAA Order 5190.6C

FAA Order 5190.6C, the current Airport Compliance Manual, became effective February 20, 2026. It guides FAA personnel administering the airport-compliance program. It is agency guidance, not a statute or regulation, and controlling law prevails if a conflict exists.

The Order addresses:

- unjust discrimination;
- aeronautical leases;
- noise and access restrictions;
- safety and efficiency restrictions;
- airport revenue;
- self-sustainability;
- rates and charges;
- financial reporting; and
- compatible land use.

The Order calls for a balanced approach to noise mitigation and generally treats operating restrictions as a last resort when nonrestrictive measures are inadequate.

2.5 Touch-and-go operations

The current compliance manual states that touch-and-go operations cannot be restricted without justification. A safety or efficiency restriction must rest on an analysis of safety, efficiency, and capacity and must satisfy applicable noise and access requirements.

The report therefore avoids the broader statement that touch-and-go operations may never be restricted. It also avoids suggesting that airport ownership alone authorizes a prohibition.

2.6 Airport Noise and Capacity Act and Part 161

The Airport Noise and Capacity Act of 1990 established a national aviation-noise policy and constrained certain local noise and access restrictions. FAA regulations in 14 C.F.R. Part 161 establish notice, analysis, agreement, review, and approval procedures for covered restrictions.

A covered restriction affecting Stage 3 aircraft generally may not take effect without FAA approval, but Part 161 includes exemptions and an agreement process. Restrictions can include more than ordinances. Depending on function, leases, hours-of-operation limits, operational limits, and airport-use charges may fall within the framework.

2.7 Part 150

Part 150 establishes a voluntary federal airport-noise compatibility planning process. It includes standardized noise-exposure mapping, land-use compatibility, consultation, and noise-compatibility program procedures.

Part 150 is important because it demonstrates the federal preference for a structured process using defined conditions, standardized methods, alternatives, consultation, and documented measures. A local voluntary program does not automatically become a Part 150 program.

2.8 Part 36

Part 36 establishes aircraft type- and airworthiness-certification noise standards. It expressly does not determine whether a particular noise level is acceptable or unacceptable at an individual airport.

This explains how two propositions can both be true:

- an aircraft may satisfy applicable certification and operating rules; and
- nearby residents may experience substantial annoyance.

2.9 Complaint evidence

FAA policy states that complaint data generally are not statistically valid measurements of a noise problem and usually do not provide sufficient justification for an operating restriction.

That limitation does not make complaints irrelevant. Complaints can identify:

- recurring times and locations;
- operation types;
- communication gaps;
- possible procedural deviations;
- concerns requiring investigation; and
- patterns that should be tested against objective data.

Complaints document community experience. Operational and noise data test what occurred.

3. Judicial and Administrative Authorities

3.1 City of Burbank

City of Burbank demonstrates broad federal preemption of local aircraft-noise regulation adopted through general police power. It should be read with the airport-proprietor distinction in mind.

3.2 Griggs v. Allegheny County

In *Griggs v. Allegheny County*, 369 U.S. 84 (1962), the Supreme Court held the airport proprietor responsible for a taking of an air easement caused by regular, very low airport approach flights. The case is relevant to proprietor responsibility and compatible land-use planning. It is not a general grant of authority to regulate aircraft operations.

3.3 Pompano Beach

In *Aircraft Owners & Pilots Association Members v. City of Pompano Beach*, FAA Docket No. 16-04-01, the FAA found several operational restrictions unjustly discriminatory where the sponsor did not adequately substantiate safety and efficiency justifications.

The decision is an FAA administrative determination, not a judicial holding.

3.4 Centennial Airport

The Centennial Airport history requires two decisions:

- In 1998, the Colorado Supreme Court upheld state-law enforcement of the airport's scheduled-passenger-service prohibition.

- In 2001, the Tenth Circuit affirmed the FAA’s determination that the total ban was unreasonable and federally preempted.

Citing only one stage would produce a misleading account.

3.5 Town of Superior and Rocky Mountain Metropolitan Airport

In *Town of Superior v. Board of County Commissioners of Jefferson County*, 2026 COA 14, the Colorado Court of Appeals affirmed dismissal of a requested noise-abatement injunction because a state-court order compelling operational restrictions would constitute impermissible local control of aircraft noise.

The court did not hold that the airport proprietor could lawfully impose the requested touch-and-go ban. It also reversed dismissal of the separate lead-emissions theory and remanded that issue for further analysis.

The official appellate status should be checked immediately before publication.

3.6 Comparative examples

Naples, Santa Monica, East Hampton, and Westchester County illustrate that access restrictions are highly fact- and process-dependent. They should not be converted into slogans stating that local restrictions are always valid or always invalid.

The practical lesson is narrower: identify the measure’s actual function, the aircraft and operators affected, the evidence supporting it, the federal procedures implicated, and the sponsor’s grant obligations.

4. Major Themes from the Town Hall

4.1 The gap between public expectations and legal authority

BAS analysis. Residents experience noise at the household and neighborhood level. The most intuitive remedy is therefore local: ask the City to stop or limit the activity. The legal framework instead divides authority among federal agencies, the airport sponsor, courts, state and local land-use systems, and voluntary operator practices.

This produces three recurring misunderstandings:

1. **Ownership is confused with operational sovereignty.** The City owns airport property but does not control navigable airspace or pilot decisions in the same way it controls a municipal street.
2. **Voluntary guidance is confused with enforceable regulation.** A VNAP can influence behavior without creating a legal violation every time a pilot does not follow a preferred procedure.
3. **Community impact is confused with regulatory proof.** A resident’s experience can be genuine even when it does not satisfy the evidentiary requirements for a mandatory restriction.

4.2 Noise regulation

Noise regulation is not one tool. It includes:

- aircraft-certification standards;
- federal flight and airspace rules;
- airport-noise compatibility planning;
- land-use compatibility;
- voluntary procedures;
- operator education;
- complaint management;
- flight-track and noise monitoring;
- property interests and easements;
- airport design;
- building mitigation; and
- carefully reviewed access restrictions.

A dispute becomes harder to resolve when these tools are treated as interchangeable.

4.3 Data-driven decision-making

Data should answer defined questions. A large dataset does not by itself create a policy.

Useful questions include:

- What operation is causing the concern?
- When and where does it occur?
- Which operators and aircraft are involved?
- What guidance applies?
- What conformance rate is observed?
- What safety, weather, or airspace factors explain variation?
- What outcome is the program intended to change?
- Did the outcome change after intervention?

4.4 Airport governance

Airport governance is often misunderstood because the sponsor has simultaneous roles:

- property owner;
- federal grant recipient;
- public-use facility operator;
- local government agency;
- landlord;
- infrastructure manager;
- community-facing institution; and
- participant in the national aviation system.

Each role carries different powers and constraints.

4.5 Community engagement

Community engagement is not limited to accepting complaints or holding a public meeting. A credible process should:

- explain authority and limitations;
- acknowledge lived experience;
- identify what will be measured;
- publish methods and limitations;
- respond to recurring questions;
- report what changed;
- explain what did not change and why; and
- maintain engagement between periods of controversy.

4.6 Airport planning

Noise, development, finance, staffing, and land use are connected. Airport plans should align:

- desired airport role;
 - operational demand;
 - compatible land use;
 - capital improvement needs;
 - staffing;
 - leases and development;
 - revenue;
 - community-engagement capacity; and
 - federal compliance.
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5. Questions Raised by the Community

The Town Hall and July 28 public comments produced recurring questions.

5.1 Why can the City not simply prohibit touch-and-go operations?

Because a prohibition would affect airport access and aircraft operations. It would require a defensible legal and factual basis and review under applicable federal grant, safety, efficiency, noise, access, and preemption requirements.

5.2 Can the City establish a curfew?

A mandatory curfew would likely implicate federal preemption and the ANCA/Part 161 framework. A voluntary preferred-hours program is legally and operationally different from an enforceable curfew.

5.3 Why accept federal funding if it limits local control?

Federal funding supports airport safety and infrastructure but carries continuing sponsor obligations. The policy question is not simply funding versus autonomy. It includes the airport's infrastructure needs, grant assurances, existing obligations, and the consequences of declining future assistance.

5.4 Can complaints justify a restriction?

Complaints are important evidence of community experience but generally are not a statistically valid measurement of a noise problem. A restriction requires a stronger evidentiary record, including objective conditions, alternatives, effectiveness, and legal review.

5.5 Can landing fees reduce unwanted activity?

A landing fee may be a lawful revenue tool when designed around allowable costs and administered fairly. Using a charge principally as a penalty to deter a targeted lawful operation raises separate compliance concerns. Revenue, administrative cost, operational response, discrimination, and FAA requirements must be evaluated together.

5.6 Who should advise Council?

The record supports a defined technical group with aviation, operational, data, and FAA expertise. Such a group should analyze and recommend, while elected officials and authorized staff retain policy and budget authority.

5.7 How should effectiveness be measured?

Effectiveness requires:

- a defined objective;
 - a baseline;
 - a conformance metric;
 - an outcome metric;
 - an implementation date;
 - controls for weather, safety, and other external factors;
 - a reporting schedule; and
 - a process for adjustment.
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6. July 28, 2026 Policy Follow-Up

6.1 VNAP baseline assessment

Consultant finding. AMS described Longmont's VNAP as broad, longstanding, and distributed through the website, flight schools, the fixed-base operator, posters, the Chart Supplement, electronic flight bag formats, airfield signage, and AWOS.

AMS reported that the City had not previously completed a formal independent assessment of the program's structure or effectiveness.

The two initial 2025 indicators were:

Measure	AMS baseline	Interpretation limit
Total 2025 operations within preferred 8 a.m.–8 p.m. window	Approx. 88%	Does not establish touch-and-go conformance, conformance with every VNAP element, or causation
Total 2025 operations using preferred Runway 29	Approx. 65%	Wind strongly influences runway selection; wind-normalize before treating the result as a performance outcome

Flight-path, altitude, pattern, and operator-specific conformance require additional sustained analysis.

6.2 Comprehensive versus effective

BAS analysis. Program evaluation should distinguish:

- **completeness:** what procedures and communication channels exist;
- **conformance:** whether eligible operators follow them;
- **effectiveness:** whether desired outcomes improve; and
- **legitimacy:** whether objectives, methods, limits, and results are transparent.

6.3 Objectives–conformance–outcomes framework

Objective	Conformance measure	Outcome measure
Encourage preferred hours	Operations and touch-and-goes inside/outside preferred window	Change in nighttime events and related complaint patterns
Encourage preferred runway	Wind-normalized Runway 29 use	Change in overflight distribution
Improve preferred flight paths	Eligible tracks within defined corridors	Change in concentrated overflight frequency
Improve altitude guidance	Eligible tracks meeting defined gates	Change in low-overflight events and matched concerns
Manage repetitive patterns	Touch-and-go counts, pattern occupancy, operator distribution	Change in concentrated exposure periods
Improve operator participation	Operator-specific conformance and engagement	Improvement following targeted outreach
Improve complaint response	Acknowledgment, investigation, and closure	Resident understanding and recurring-issue resolution
Improve public understanding	Reporting and engagement measures	Surveyed understanding, trust, and transparency

6.4 Technical advisory group

AMS recommended a technical advisory group focused on operations, aircraft noise, and VNAP improvement. Council discussion identified possible functions including:

- review of operational data;
- evaluation of proposed voluntary procedures;
- operator and flight-school engagement;
- congestion-management analysis;
- advice on cockpit and preflight communication;
- FAA coordination; and
- technical findings reported through City management.

The group's charter should define purpose, membership, conflicts, transparency, reporting, resources, and sunset.

6.5 Complaint management

AMS recommended structured complaint fields addressing:

- date and time;
- location;
- concern type;
- operation type;
- aircraft description; and
- narrative comment.

Complaints should be correlated with operational data where feasible. Public reports should distinguish total complaints, unique complainants, events, locations, recurring patterns, and response measures.

6.6 Staffing

The consultant and Council discussion recognized that expanded monitoring, complaint investigation, operator engagement, reporting, and technical facilitation require dedicated capacity. The City may provide that capacity through internal staff, specialist contracts, or a combination.

No numerical airport-staffing estimate is used as a report finding. The approximate 1.78 airport-FTE figure heard in Council discussion remains unverified and is excluded from substantive analysis pending a controlling staffing record.

6.7 Council direction on VNAP

Council direction. Council unanimously directed the City Manager to return by the end of Q3 2026 with implementation options covering the AMS recommendations, data collection, a technical advisory group, operator analytics, measurable targets, complaint tracking, resident feedback, and public reporting. Staff discussion anticipated presenting relative impact, cost, and sequencing, but that anticipated prioritization is not restated here as adopted motion language.

A second motion, approved 6–1, directed the City to begin improving communications through AWOS, the website, and third-party aviation platforms, subject to practical implementation and FAA coordination where needed.

Neither motion established a mandatory operating restriction or immediately implemented every recommendation.

7. Rates, Charges, and Financial Capacity

7.1 Consultant recommendations

Bolton & Menk recommended consideration of:

- updated ground and hangar rates;
- 2–3 percent annual lease escalators, favoring 3 percent;
- updated lease templates and possible reversion clauses;
- a standardized leasing policy;
- review of minimum standards and airport regulations;
- fuel-flowage and ramp-fee increases;
- phased development of the Southwest area;
- intergovernmental funding;
- cost containment;
- a funded multiyear capital plan; and
- landing-fee alternatives.

7.2 Landing-fee scenarios

The study modeled three weight-based scenarios:

Rate	Estimated non-based net revenue	Additional based-aircraft amount	Approximate combined total
\$3.00 per 1,000 lb.	\$243,292.40	\$113,243.28	\$356,535.68
\$2.00 per 1,000 lb.	\$162,194.93	\$75,495.52	\$237,690.45
\$1.00 per 1,000 lb.	\$81,097.47	\$37,747.76	\$118,845.23

These are modeled estimates, not approved revenue. Actual results would depend on aircraft operations and weight, treatment of touch-and-goes, exemptions, collection cost, compliance, behavioral response, legal design, and implementation timing.

7.3 Financial correction

Consultant finding. The published study projected negative ending working capital beginning in 2028.

Meeting record. During the Council meeting, City budget staff stated that the beginning-working-capital analysis duplicated carryover and that corrected balances continued to decline but did not become negative within the five-year period shown.

Prepublication verification status. The published series is contradicted by the later oral correction and should not be presented as the City’s current forecast. BAS has not yet obtained a corrected exhibit or adopted minutes; accordingly, this report does not publish replacement balances or independently validate the corrected series.

BAS analysis. The reported correction does not resolve capital capacity. During the meeting, staff attributed the positive corrected operating balance partly to limited capital spending. Needed projects and grant matches could change the fund’s position, but that effect must be tested against a corrected financial model before publication as a quantified conclusion.

7.4 Operating sustainability versus capital capacity

An airport may maintain a positive operating balance while lacking the resources to:

- match grants;
- rehabilitate pavement;
- replace equipment;
- prepare plans and designs;
- extend infrastructure;
- support development;
- maintain reserves; or
- implement expanded community programs.

A complete financial framework should separately identify operating reserves, capital reserves, grant-match capacity, unrestricted liquidity, committed funds, and project funding.

7.5 Council direction on rates and charges

Council direction. By a 4–3 vote, Council directed staff to return with an “all-of-the-above” financial-sustainability package including leases, hangar and tiedown rates, fuel-flowage fees, lease escalators, minimum standards, development opportunities, and \$3-per-1,000-pound landing-fee models for based and non-based aircraft.

The motion did not enact a fee, approve a final schedule, determine exemptions, or complete FAA review.

8. BAS Integrated Governance Framework

8.1 Core principle

Airport-community conflict cannot be addressed effectively through isolated noise procedures. It requires an integrated system of FAA-informed governance, measurable performance, transparent communication, technical expertise, financial capacity, and continuous community engagement.

8.2 The governance cycle

- 1. **Define the issue.** Identify the operation, time, location, population, and desired outcome.
- 2. **Identify authority.** Separate FAA control, sponsor authority, local land-use power, voluntary action, and legal constraints.
- 3. **Establish the baseline.** Record operations, conformance, complaints, land use, capacity, and finance.
- 4. **Select measures.** Pair every objective with conformance and outcome measures.
- 5. **Assign capacity.** Identify owner, expertise, hours, cost, funding, and dependencies.
- 6. **Implement transparently.** Publish purpose, method, exceptions, and timeline.
- 7. **Evaluate results.** Compare actual results with baseline and target.
- 8. **Engage continuously.** Report to pilots, residents, staff, and elected officials.
- 9. **Adjust.** Retain, improve, replace, or discontinue measures based on evidence.

8.3 Accountability matrix

Function	Primary responsibility
Airspace, flight rules, aircraft and pilot regulation	FAA and federal government
Airport property, leases, facilities, local program administration	Airport sponsor
Policy, budget, rates, and local land-use decisions	Authorized City officials
Safe aircraft operation	Pilot in command and operator
Technical analysis	Qualified staff, consultants, and chartered technical group
Community experience and local knowledge	Residents and affected stakeholders
Independent interpretation and comparative lessons	BAS and other research institutions

9. Implications for Colorado Airports and Communities

9.1 Explain authority before proposing solutions

Communities should understand which entity controls an issue before investing in a remedy. This reduces false expectations and helps focus effort on measures that can be implemented.

9.2 Measure voluntary programs

Voluntary does not mean unmeasurable. Airports can measure participation without turning guidance into a mandatory restriction.

9.3 Normalize data for operational conditions

Runway, altitude, flight path, and time-of-day metrics should account for wind, weather, safety, airspace, aircraft performance, emergencies, and data quality.

9.4 Treat complaints as a management dataset

Complaint systems should support investigation, communication, and pattern analysis while clearly explaining their statistical limits.

9.5 Build technical governance deliberately

A technical group needs a written charter, balanced qualifications, public accountability, defined deliverables, staff support, and a boundary between advice and decision-making.

9.6 Connect implementation to finance

Monitoring, outreach, reporting, and engagement require recurring funding. Airport-community commitments should be included in staffing and financial plans.

9.7 Correct public information visibly

When a financial or operational error is discovered, the corrected exhibit should replace the earlier version, affected scenarios should be recalculated, and decision-makers should be told which conclusions changed.

9.8 Develop regional strategies

Training activity, airspace, flight schools, and noise effects cross municipal boundaries. Colorado's Front Range airports may benefit from shared operator outreach, comparable metrics, regional data standards, and coordinated education.

10. BAS Findings

1. **Federal authority and local responsibility coexist.** Federal control of airspace does not eliminate sponsor duties in property management, access, land use, finance, communication, and planning.
2. **Ownership does not equal unrestricted operational control.** A municipal airport proprietor remains subject to preemption, grant assurances, FAA policy, and federal procedures.
3. **A comprehensive VNAP is not necessarily effective.** Effectiveness requires measurable objectives, conformance, and outcomes.
4. **Complaints are essential but insufficient alone.** They document experience and identify patterns but generally cannot carry the evidentiary burden for a restriction.
5. **Data must be interpreted, not merely collected.** Weather, safety, airspace, operations, and data limitations affect every performance measure.
6. **Council direction is not implementation.** The July 28 motions requested future work products; they did not create a fee, a restriction, a TAG, or a staff position.
7. **Financial accuracy is a governance requirement.** City staff stated that a late correction changed the published operating forecast. A corrected exhibit must be obtained before further scenario analysis or publication of replacement figures.
8. **Operating balance and capital capacity are different.** A positive operating balance does not establish the ability to fund improvements, grant matches, or new programs.

9. **Technical expertise requires accountable structure.** A technical group should analyze and advise under a written charter, not replace elected or administrative decision-making.
 10. **Trust depends on continuous communication.** Communities need accessible explanations of authority, methods, results, corrections, and follow-up.
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11. BAS Observations

- The Town Hall addressed legal authority, while the next evening's Council meeting exposed the implementation challenge.
 - The strongest area of emerging consensus was the need for better data and transparent reporting.
 - The most significant disagreement concerned timing and design of landing-fee analysis.
 - Staffing capacity is a common dependency across VNAP, complaints, data, rates, leases, development, and FAA coordination.
 - The July 28 financial correction demonstrates why technical review and version control should precede policy direction based on modeled figures.
 - Longmont's experience is not unique. Similar expectation gaps are likely at growing general aviation airports across Colorado.
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12. BAS Recommendations

These recommendations are offered as an educational governance framework, not advocacy for a particular operational restriction or fee.

1. Publish a corrected financial exhibit before relying on the five-year forecast.
 2. Establish an objectives–conformance–outcomes matrix for every VNAP element selected for monitoring.
 3. Adopt a written methodology for flight-track, altitude, runway, time, and operator analysis.
 4. Redesign complaint intake around structured fields while retaining narrative comments.
 5. Publish recurring operational, conformance, complaint, outreach, and implementation reports.
 6. Charter the technical group with defined qualifications, scope, transparency, reporting, and sunset.
 7. Prepare a staffing and cost plan before promising recurring monitoring or engagement.
 8. Evaluate landing fees as a financial instrument separately from noise deterrence.
 9. Integrate airport vision, capital planning, development, rates, staffing, and community programs.
 10. Create a regional Front Range forum for voluntary pilot education and comparable operational metrics.
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13. Future Research Topics

- Colorado airport-proprietor authority after *Town of Superior*.

- Comparative analysis of voluntary noise-abatement programs at Colorado general aviation airports.
 - Flight-training growth and regional distribution along the Front Range.
 - Methods for measuring voluntary procedure conformance at non-towered airports.
 - Complaint-system design and statistical interpretation.
 - Airport technical advisory-group governance models.
 - Landing-fee implementation at general aviation airports.
 - Airport reserve and grant-match policies.
 - Compatible land-use practices within airport influence areas.
 - Electric and lower-noise aircraft as long-term community-compatibility tools.
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14. Key FAA and Legal References

1. 49 U.S.C. § 40103 — Sovereignty and use of airspace.
 2. 49 U.S.C. §§ 47521–47534 — Airport Noise and Capacity Act framework.
 3. 49 U.S.C. §§ 47107 and 47133 — Airport sponsor and airport-revenue requirements.
 4. 14 C.F.R. Part 36 — Aircraft noise certification standards.
 5. 14 C.F.R. Part 150 — Airport noise compatibility planning.
 6. 14 C.F.R. Part 161 — Notice and approval of airport noise and access restrictions.
 7. FAA Order 5190.6C, *Airport Compliance Manual* (2026).
 8. FAA, *Airport Sponsor Assurances* (April 2025), especially Assurances 21, 22, 24, 25, and 26.
 9. FAA, *Policy Regarding Airport Rates and Charges*.
 10. *City of Burbank v. Lockheed Air Terminal, Inc.*, 411 U.S. 624 (1973).
 11. *Griggs v. Allegheny County*, 369 U.S. 84 (1962).
 12. *Aircraft Owners & Pilots Association Members v. City of Pompano Beach*, FAA Docket No. 16-04-01.
 13. *Arapahoe County Public Airport Authority v. Centennial Express Airlines, Inc.*, 956 P.2d 587 (Colo. 1998).
 14. *Arapahoe County Public Airport Authority v. FAA*, 242 F.3d 1213 (10th Cir. 2001).
 15. *Town of Superior v. Board of County Commissioners of Jefferson County*, 2026 COA 14.
 16. *City of Naples Airport Authority v. FAA*, 409 F.3d 431 (D.C. Cir. 2005).
 17. *City of Santa Monica v. FAA*, 631 F.3d 550 (D.C. Cir. 2011).
 18. *Friends of East Hampton Airport, Inc. v. Town of East Hampton*, 841 F.3d 133 (2d Cir. 2016).
 19. *Delux Public Charter, LLC v. County of Westchester*, No. 24-1895 (2d Cir. Aug. 26, 2025) (summary order).
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Appendix A — Meeting Concepts Pending Quotation Verification

No transcript-derived statement is published here as a direct quotation. Automated transcripts were used only as finding aids. Before quotation marks, speaker attribution, or timestamps are added to the publication, BAS will compare each candidate passage with the official recording.

Concepts retained for possible later verification include:

- the distinction between municipal airport ownership and federal control of flight;
 - the recurring question of why the City cannot prohibit repetitive touch-and-go operations;
 - the distinction between a comprehensive program and an effective program;
 - limitations in available data for measuring broader VNAP conformance; and
 - the oral correction to the Airport Fund working-capital forecast.
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Appendix B — July 28 Council Actions

Motion	Result
Return by end of Q3 2026 with VNAP implementation options, metrics, TAG, operator analysis, complaint tracking, and reporting	Unanimous
Begin updates to AWOS, website, and third-party VNAP communications	6–1
Return with broad rates-and-charges package including \$3-per-1,000-pound landing-fee models	4–3

Appendix C — Publication-Stage Verification List

- Confirm adopted July 28 minutes and exact motion text.
 - Confirm councilmember names, titles, and vote roster.
 - Obtain corrected 2026–2030 Airport Fund exhibit.
 - Recalculate financial scenarios from corrected figures.
 - Verify historical City financial figures against final statements.
 - Confirm official appellate status of *Town of Superior*.
 - Add exact transcript and video timestamps.
 - Verify the airport staffing figure.
 - Confirm subsequent action on the TAG, communications, rates, and landing-fee models.
 - Complete citation formatting and FAA Research Library archive.
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Appendix D — Source Notes

1. **Town Hall identity and purpose:** City of Longmont event announcement and project page; official July 27, 2026 recording; City presentation slides.
2. **AMS findings:** *Vance Brand Municipal Airport Voluntary Noise Abatement Program Assessment*, contained in the July 28, 2026 Council packet, especially packet pages 205–206. The written report states that approximately 88 percent of **total 2025 operations** occurred during the preferred 8:00 a.m.–8:00 p.m. window and that Runway 29 accounted for approximately 65 percent of total operations.

3. **Council actions:** July 28, 2026 regular-session meeting record and official recording. This approval draft reports vote totals and operative direction but retains adopted minutes and exact roster as publication-stage checks.
4. **Rates and charges:** Bolton & Menk study in the July 28 Council packet. Landing-fee values are modeled estimates, not enacted fees or guaranteed revenues.
5. **Financial correction:** July 28 meeting record. Because the correction was delivered orally and BAS does not yet possess a corrected exhibit, the draft does not publish a replacement forecast.
6. **Federal authorities:** 49 U.S.C. §§ 40103, 47107, 47133, and 47521–47534; 14 C.F.R. Parts 36, 150, and 161; FAA Order 5190.6C; and FAA Airport Sponsor Assurances dated April 2025.
7. **Judicial and administrative authorities:** official or recognized legal repositories identified in Section 14. Case status and subsequent history remain subject to a final publication-date check.