

CITY OF CHERRY HILLS VILLAGE

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Care of Leslie.lardie@FAA.gov
May 25, 2017

Re: NextGEN METROPLEX DENVER (Denver Metroplex)
PUBLIC COMMENT AND OBJECTION

To Whom it may Concern:

This shall constitute notice of strong objection to the Denver Metroplex plan on the following basis:

1. THE PUBLIC INPUT PROCESS IS SERIOUSLY FLAWED. The website fails to provide adequate information for the public to make informed decisions. Public and local jurisdictions must extrapolate from general maps where the flight plans will be located and the altitude at which aircraft will be flying. Misleading and/or inadequate information results in the public being unable to provide meaningful input or objections to the proposed Denver Metroplex project.
2. NOISE LEVELS ARE BASED UPON AVERAGES AND UPON VIRTUAL NUMBERS, NOT ACTUAL READINGS. As you are fully aware noise compatibility is not based upon the actual decibel levels which may be experienced by citizens arising from or related to the noise generated by concentrated flight paths, but is instead a function of Land Use Compatibility charts and an algorithm generated by the FAA. The FAA has determined that numbers generated by this virtual reality program which show 65 decibels or less, averaged over both day and night ("DNL") does not constitute "significant impact" on land uses below the concentrated flight path; provided that people are inside with windows closed. (The undersigned has been unable to locate any independent studies conducted by or relied upon by the FAA to make the determination that 65db DNL has "no significant impact" on people's health and welfare).
3. 14 CFR 150 PROVIDES FOR LOCAL AUTHORITITES TO DETERMINE NEEDS AND VALUES FOR NOISE COMPATIBILITY, WHICH PROCESS HAS NOT BEEN IMPLEMENTED. Regulations provide that "local needs or values may dictate further delineation based on local requirements or determinations." It further provides that "noise sensitive public buildings, (such as schools, hospitals, and health care facilities) and properties on or eligible for inclusion in the National Register of Historic Places" may be incompatible

with the 65 decibel DNL. Before proceeding further, I would urge the FAA to work closely with local communities in order to provide maximum transparency and information to avoid the litigation which is occurring all over the country in cities where Metroplex has been implemented. Going full speed ahead with Denver Metroplex without due consideration to the issues and problems which may be raised by Colorado communities and in other jurisdictions experiencing the actual impact of Metroplex, is counterproductive and costly for all concerned.

4. **EQUAL PROTECTION AND CHILDRENS HEALTH.** All schools and hospitals are due the same noise sensitive considerations that would be accorded public schools, hospitals and nursing homes. Children at religious and private schools have exactly the same issues as public school children. The fact that the FAA is permitted to disregard private secular and religious institutions in determining noise sensitive areas is unacceptable. The southeast area of Denver, of which my jurisdiction is a part, has 23 schools serving kindergarten through High School students in an area of less than 20 square miles. This does not include preschools. There are numerous studies which indicate that all children should be outside as a part of their school day AND while out of school. Parks, trails and open space areas are key to the health of our children, not to mention wildlife. Colorado is spending significant sums through grants and programs to make sure children can play and exercise outside. Concentrated flight paths that require impacted individuals to stay inside with windows closed runs counter to everything Colorado school districts, parents and elected representatives have been trying to achieve. **CONCENTRATED FLIGHT PATHS PUT OUR CHILDREN'S HEALTH, SAFETY AND WELFARE AT RISK.** If Denver Metroplex goes forward the area shown on exhibit A is a noise sensitive area, due to schools, historic landmarks and hospitals. (Only schools are shown on Exhibit A, however this is the highest density of schools in the Metro Area, all of which have buildings which predate DIA and many of which predate Centennial Airport)
5. **FUEL CONSERVATION AND SAFETY.** The major stated reasons for the proposed Denver Metroplex is safety and fuel economy. These two priorities are not integrally tied. The safety of approaching and departing flights can be implemented for existing routes with new satellite technology. **THE EMPHASIS ON CONCENTRATED FLIGHT PATHS IS DESIGNED TO ACHIEVE MAXIMUM FUEL EFFICIENCY NOT SAFETY.** While reducing fuel consumption is a laudable goal, it should not be accomplished at the expense and health of our citizens. Benefitting the passengers and stockholders of airlines should not be achieved at the cost of innocent residents. Although adverse impacts on home value is not a FAA criteria for determining significant impact caused by noise, it is my opinion that when government action effectively causes equity loss in homes in return for an economic benefit to the airlines, it is an egregious abuse of power. Aircraft safety is important, but so too is the health, welfare and the safety of our residents. Those two priorities are both compatible and achievable. The priority of reducing fuel costs should be a distant third.

I LOOK FORWARD TO WORKING WITH THE FAA TO ACHIEVE A REASONABLE, SAFE AND HEALTHY ENVIRONMENT FOR OUR COMMUNITIES IMPACTED BY THE PROPOSED DENVER METROPLEX.

Respectfully Submitted,

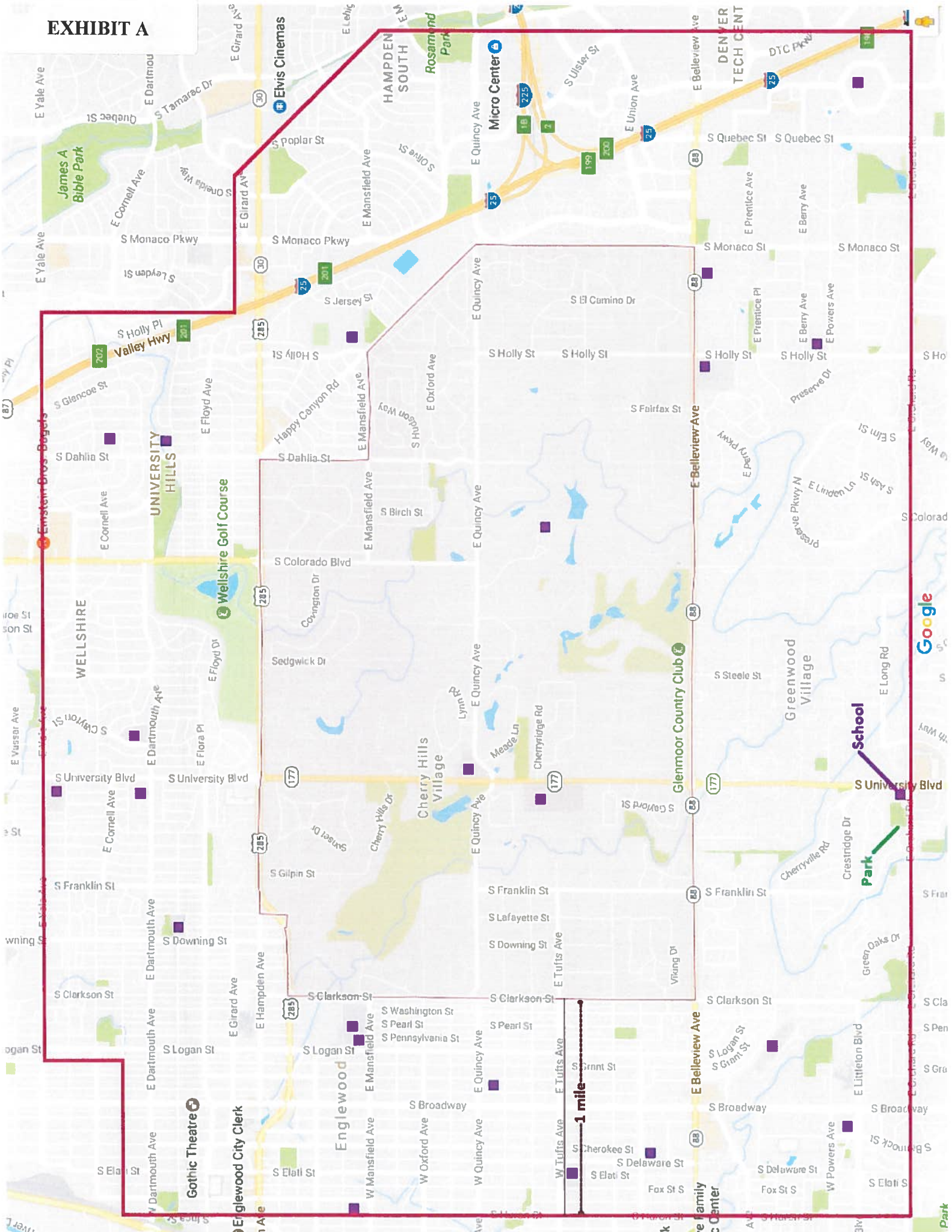


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Mayor
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EXHIBIT A



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