

There are three core themes that are presented over and over again, within the Aril 6th letter from the FAA Regional Administrator:

1. the claim that the pattern was not changed (implying it was not elongated by adjusted ATC policies);
2. the claim that FAA lacks authority on many important matters (effectively, punting that authority to the airport authority and flight schools); and,
3. the claim that the pattern elongation did happen but was due to a substantial increase in traffic operations in 2022.

Here is the text of the FAA letter response to Question #1: (emphasis added)

FAA Response: The FAA conducted an analysis of traffic patterns around Centennial Airport (KAPA) that revealed a significant increase in the volume of visual flight rules (VFR) aircraft flights in the calendar year 2022. It was determined the primary and overriding causal factor for the longer VFR pattern footprint (referred to as the “extended traffic pattern” in your questions) was the increased volume of aircraft competing for the same runway capacity. The FAA did not change how the traffic pattern is managed at KAPA. Rather, as aircraft are added to the VFR pattern, the pattern naturally becomes elongated.

A Rebuttal, Using FAA’s Data...

FAA declares the pattern elongated due to significant increase in VFR flights, revealed in an ‘analysis’. Well, this statement is false. FAA’s data instead indicates significant declines in traffic counts.

Here’s FAA’s KAPA traffic counts, from OPSNET/ATADS, showing local operations counts each months, from January 2019 through January 2023. For this analysis, the data was processed further; it includes a monthly average (column just right of the 2023 column), a comparison of the average with 2019 (next column), and a comparison of 2022 versus 2019 (far right column). The conclusions from this table include:

FAA ATADS data, from 01/2019 To 01/2023, Local OPS Facility=APA								
	2019	2020	2021	2022	2023	average	AVE vs 2019	2022 vs 2019
January	11,190	14,386	10,668	9,190	11,936	11,474	3%	-18%
February	9,406	10,383	8,582	9,863		9,559	2%	5%
March	12,487	14,465	11,019	10,435		12,102	-3%	-16%
April	15,269	5,534	13,479	10,615		11,224	-26%	-30%
May	15,120	17,485	9,202	12,558		13,591	-10%	-17%
June	16,917	9,149	12,885	10,608		12,390	-27%	-37%
July	14,678	17,332	12,101	15,221		14,833	1%	4%
August	17,277	17,891	12,064	14,508		15,435	-11%	-16%
September	15,172	18,838	13,543	3,531		12,771	-16%	-77%
October	12,414	16,285	11,680	14,076		13,614	10%	13%
November	12,568	11,752	10,934	9,692		11,237	-11%	-23%
December	14,297	12,187	9,989	11,274		11,937	-17%	-21%
Annual Total	166,795	165,687	136,146	131,571		150,050	-9%	-21%

November, ‘22 vs ‘19: -23%

- KAPA’s 2022 local OPS are 21% less than in 2019
- the AVERAGE local ops (for all months, 2019 into 2023) declined 9% from 2019
- During runway work closures in September and November 2022, counts declined even further, September down 77% and November down 23%.

Seemingly, the factual decline in local pattern flights might have been more than offset by an increase in itinerant flights (those not staying in the patterns. Let's take a look:

Nope.

No increase in the itinerant count, either. The average declined 6% below 2019; the 2022 itinerant ops count was even worse, declining 7% below 2019.

FAA ATADS data, from 01/2019 To 01/2023, Itinerant OPS Facility=APA								
	2019	2020	2021	2022	2023	average	AVE vs 2019	2022 vs 2019
January	13,693	15,001	12,876	12,628	11,641	13,168	-4%	-8%
February	12,582	11,942	10,509	12,870		11,976	-5%	2%
March	14,532	11,825	12,677	14,382		13,354	-8%	-1%
April	15,438	5,773	13,553	12,886		11,913	-23%	-17%
May	14,435	12,537	13,390	13,713		13,519	-6%	-5%
June	16,588	15,570	16,843	14,924		15,981	-4%	-10%
July	17,091	16,196	17,058	15,604		16,487	-4%	-9%
August	18,036	17,510	17,048	15,755		17,087	-5%	-13%
September	16,609	16,988	16,490	15,076		16,291	-2%	-9%
October	14,607	15,609	15,290	15,650		15,289	5%	7%
November	13,506	12,647	14,315	12,336		13,201	-2%	-9%
December	14,961	12,995	14,151	12,694		13,700	-8%	-15%
Annual Total	182,078	164,593	174,200	168,518		172,347	-6%	-7%

So, the FAA claim about “...increase in the volume of VFR flights...” is wrong; a lie, a distortion and a distraction. Shame on FAA for floating this false claim.

...And the Problem Goes Beyond KAPA

FAA is failing to mitigate noise and pollutant (fumes and even toxic lead) impacts around the Centennial Airport. But, even more, FAA is failing to manage the capacity for each airport, and the overall efficiency of the systems of airports. (The letter actually stated this, declaring it is up to private interests to make capacity decisions. Huh.) The airports around Denver are a regional subsystem impacted by FAA's failure.

FAA ATADS data, from 01/2019 To 01/2023, Local OPS Facility=BJC								
	2019	2020	2021	2022	2023	average	AVE vs 2019	2022 vs 2019
January	6,928	9,111	6,658	6,847	11,658	8,240	19%	-1%
February	5,786	5,376	4,579	9,083		6,206	7%	57%
March	9,014	7,063	7,503	12,653		9,058	0%	40%
April	8,694	3,179	7,341	14,137		8,338	-4%	63%
May	7,129	10,808	6,577	11,147		8,915	25%	56%
June	9,145	13,057	7,204	13,537		10,736	17%	48%
July	12,068	11,425	8,905	13,693		11,523	-5%	13%
August	11,656	11,976	11,466	16,555		12,913	11%	42%
September	10,572	11,595	10,922	17,268		12,589	19%	63%
October	9,816	10,548	11,652	15,544		11,890	21%	58%
November	7,546	2,556	10,075	12,954		8,283	10%	72%
December	8,084	5,423	8,734	9,877		8,030	-1%	22%
Annual Total	106,438	102,117	101,616	153,295		115,867	10%	44%

Take a look at the first table offered in this rebuttal, above, for Local

average 3months: 16,456
 same 3months 2019: 10,681
 AUG-OCT increased by → 54%
 November increased by → 72%

Operations at KAPA. Notice the green and pink boxes in data for September and November 2022. These figures were much lower than average, associated with runway work closures. When KAPA shuts off a parallel runway, many of their students are still in town, and if they are going to fly in a closed pattern, they have to fly away and do their pattern work elsewhere.

The data for KBJC, to the north of KAPA, shows the following facts:

- first, the overall KBJC changes since 2019 are actually large increases (possibly the largest in the nation, for GA airports): the average local ops are up 10% from 2019, and the 2022 local ops are up a scorching 44% compared to 2019.
- for the three months centered on the largest runway closure, August through October, KBJC local ops were 54% higher than in 2019. Thus, the KAPA runway closure for work bumped KBJC pattern ops up another ten percentage points.
- an even larger increase was recorded in November, up 72% compared to 2019; this indicates possibly there were followup runway closures at KAPA, to finish the projects?

Suggestion:

FAA needs to produce a copy of the results and the email (and other) coordination behind this alleged analysis:

*...FAA Response: The **FAA conducted an analysis of traffic patterns around Centennial Airport (KAPA) that revealed a significant increase in the volume** of visual flight rules (VFR) aircraft flights in the calendar year 2022....*

It is clearly bad analysis, if it exists at all.