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## Appendix L – Public Involvement

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# Stakeholder Engagement Plan

## 1. Stakeholder engagement objectives

Stakeholder engagement facilitates and supports public involvement of interested members of the public – providing the opportunity for all stakeholders to participate and be heard. This plan describes coordination and communication efforts intended to inform, educate, and engage the public and airport users as part of the Federal Environmental Assessment (EA)/State Environmental Assessment Worksheet (EAW) for Lake Elmo Airport, as well as the approach for documenting the outreach process. The EA will be carried out according to the requirements of the National Environmental Policy Act (NEPA) and the EAW will be carried out according to the requirements of the Minnesota Environmental Policy Act (MEPA). The two environmental processes will be carried out in parallel and the public engagement will include both processes.

The focus audience for the strategy will be members of the Metropolitan Airports Commission (MAC) policy board, airport tenants, the general public and community leaders (elected and other) in the vicinity of the Airport, and stakeholders who actively participated in the recent long-term comprehensive plan (LTCP) process. When the term “the MAC” is used in this plan, it means the collective staff and board of commissioners and committee members acting in their respective roles and carrying out their respective responsibilities. When a specific staff or commissioner role is intended, that role is included in the reference.

The stakeholder engagement strategy is created to help the MAC achieve all of the following objectives:

- **Strengthen the MAC’s relationship with its stakeholders**
- **Foster collaboration**
- **Build stakeholder trust and support**
- **Proactively identify areas of interest and concern in a collaborative setting**
- **Support and document a thorough and effective process and create a robust documentation record**
- **Formalize a system to reach a wide variety of stakeholders and interest groups**
- **Develop a model for future similar processes**
- **Create opportunities for members of the MAC’s Board of Commissioners to recognize stakeholder engagement in the EA/EAW process**
- **Streamline agencies’ review**

By nature, this Stakeholder Engagement Plan is dynamic. Once the technical work on the EA/EAW begins, there may be circumstances that require an amendment to the plan in order to better achieve the above objectives. If the plan is amended, stakeholders will be made aware of the change through the project webpages and a notification through an electronic news (E-news) subscription service (see Section 6 Project Outreach Platforms).



## 2. Project roles and responsibilities

The stakeholder engagement framework is designed to create a shared ownership of the community engagement process for the Lake Elmo Airport EA/EAW. There are several major stakeholder groups described here including the MAC, the FAA, the Community Engagement Panel (CEP) and the interested public. The framework is built on the following roles and responsibilities.

**The MAC:** As the owner and operator of the Lake Elmo Airport, a critical part of the MAC airport system, the MAC is the sponsor of the EA and has the overall responsibility for the conduct of the EA and the EAW. The MAC developed the Scope of Work, and approved this Stakeholder Engagement Plan in consultation with stakeholders and regulatory agencies. The MAC contracted with Mead & Hunt, Inc. (the M&H Team) to provide technical consulting services for this project. In this role, the M&H Team provides information and makes recommendations to the MAC. The MAC is the final decision maker regarding all aspects of the EA/EAW including but not limited to the conduct of the EA; the composition of the CEP (See Section 3); and the alternatives considered for the EA. The MAC takes action on the final EAW as the responsible government unit under MEPA.

**Federal Aviation Administration (FAA):** The FAA is the federal regulatory agency responsible for the national system of airports and the national air space. The FAA has well defined roles and responsibilities in the airport EA process. The FAA is responsible for publishing the Federal Register notice, handling public comments received from the notice and taking action on the EA document once it is submitted to the FAA. The FAA takes action on the final EA as the lead agency under NEPA.

**Community Engagement Panel (CEP):** The CEP is an advisory board representing major community stakeholder groups that is more closely involved in the EA/EAW project than the public at large. The CEP serves several important functions including: representing a broad range of stakeholder groups in the EA, receiving information about the EA/EAW and sharing it with constituencies; providing input to the EA/EAW as the voice of key stakeholders; and in some cases, providing technical advice to the M&H Team. Experience has shown that environmental review projects can benefit from the creation and participation of a CEP as part of the EA/EAW process. See Section 3 for more information on the CEP.

**It is important to note that the CEP is advisory only to the EA/EAW.** That is, the CEP may offer opinions, advice and guidance, but the MAC has the sole discretion to act on the CEP recommendations.

**Interested Public:** Members of the public who have an interest in the EA/EAW have a role to play and a responsibility for its outcome. Members of the general public are encouraged to stay informed of the EA/EAW progress by visiting the project webpages, registering for project notifications through the E-news subscription service, participating in public milestone events, submitting comments on the EA, and attending the public hearing for the EA. See Section 6 for a discussion of communication outreach tools.

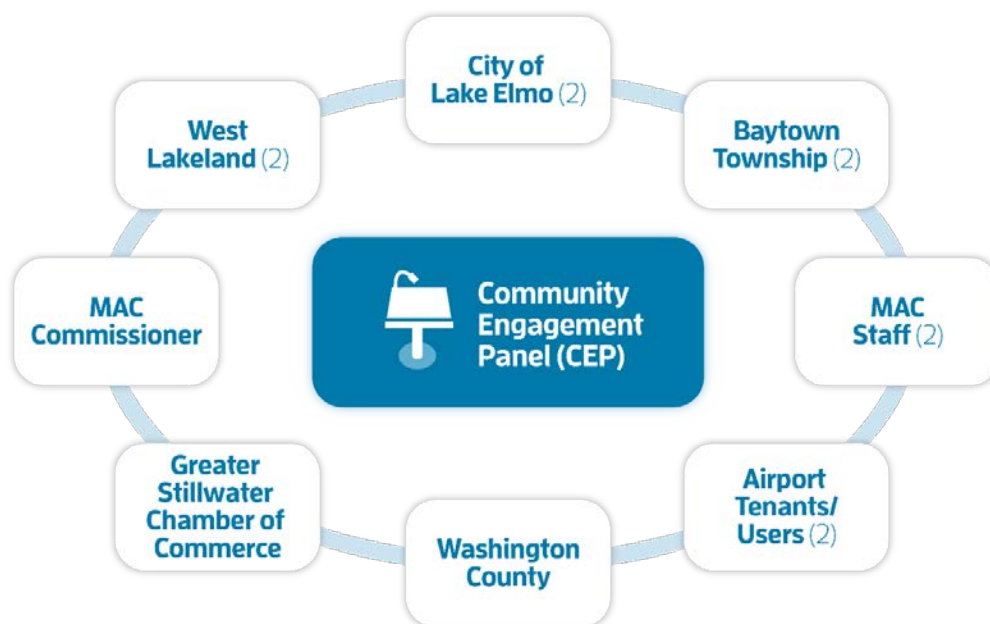
### 3. CEP membership – key stakeholder groups

In order for the CEP to be effective and to be representative of all of the key stakeholders, it must be composed of a diverse group of stakeholders including, but not limited to, community representatives, aircraft operators, and affected jurisdictions. While representation needs to be broad, the CEP needs to remain a reasonable size so that deliberations are efficient and meetings are effective.

Key stakeholder groups will be represented on the Community Engagement Panel (CEP) by the following representatives:

- **City of Lake Elmo (2 representatives)**
- **Baytown Township (2 representatives)**
- **West Lakeland Township (2 representatives)**
- **Airport Tenants/Users (2 representatives)**
- **Greater Stillwater Chamber of Commerce**
- **MAC Commissioner**
- **MAC staff (2 representatives)**
- **Washington County**

The MAC will identify specific members to serve on a CEP and extend an invitation to participate. A kick-off CEP meeting will be held in February 2017 to provide background information on the environmental process and this stakeholder engagement plan, and will prepare community leaders to respond to inquiries from their constituent groups. See Section 2 for a description of the roles and responsibilities of the CEP.



## 4. Approach to development of project messaging

The MAC, using plain language, will develop materials and messages that are clear and relevant to lay members of the community. The M&H Team will work collaboratively with the MAC staff on these efforts. While this approach will strive for brevity and clarity, the information will also be complete – erring on the side of too much information rather than too little. This will be achieved through strategies that include:

- **Use of plain language – minimizing the use of acronyms and technical jargon that would likely be unfamiliar to a public audience**
- **Providing definitions of unfamiliar or technical terms when used in project messages**
- **Providing explanations related to the requirements of the EA/EAW at each stage of the process**
- **Providing explanations of aviation terms and regulations and airport operations that are relevant to project messages**
- **Using easy-to-understand graphics, tables and charts in addition to narrative descriptions**
- **Reviewing public comments received in response to public messaging and providing additional explanation or clarification when needed through follow up outreach.**

The M&H Team may develop suggested messaging text and presentations, and the CEP may be invited to comment on draft material. However, the MAC is the owner of the EA/EAW process and will make all final decisions related to printed content and graphic material produced for the project.

## 5. Timing, notification, and format for engaging stakeholder groups

The EA/EAW process will be organized around four project milestones:

- **Milestone 1: Introduction to the NEPA process**
- **Milestone 2: Purpose & Need and Alternatives**
- **Milestone 3: Environmental Effects**
- **Milestone 4: Public Hearing**

Milestone 1 also includes an introduction to the state MEPA process. A milestone is a point in the process that will culminate in a public meeting event (See Section 7) followed by a significant project decision point for the MAC. The public input received during each milestone phase will help to inform the next project decision. For example, the input received during **Milestone 1: Introduction to the NEPA process** will be considered when developing the Purpose and Need of the project and selecting alternatives to be considered.

In order to create an open and transparent process and to encourage public involvement, the MAC will follow a standardized process for engaging stakeholder groups during each milestone. That process is described here. More information about each public outreach tool is provided in Section 6.

# Stakeholder Engagement Plan

**Project Webpages.** A set of project webpages will be maintained during the EA/EAW process to share information. The pages will be accessed through the current Lake Elmo website page of the [Metroairports.org](http://Metroairports.org) website.

**Monthly Project Updates.** A monthly project update will be sent out through the E-news subscription service to all project subscribers. Additional notifications will be sent out if information is time sensitive.

**Initial Project Schedule.** An initial project schedule is included in this Stakeholder Engagement Plan based on current expectations and assumptions (see Section 7). A current project timeline will be maintained on the project website and will be updated as needed to reflect project progress. If changes are made, that information will be shared on the project website and included in the next monthly project update sent through the E-news subscription service.

**MAC Commission/Committee Meetings.** The MAC and the M&H Team will make presentations to the members of the MAC Commission or Planning, Development, and Environment (PDE) Committee in advance of milestone events. Presentation dates, times and locations will be posted on the project website at least one week before the meetings. The public may attend these meetings and public input will follow the established protocols governing public comments during the meeting. Presentation materials including PowerPoint slides, graphic boards, and handouts will be posted to the project website no later than 3 days following the meeting. Meeting minutes and video recordings will be made available by the MAC based on the standard practice of the MAC for these meetings.

**CEP Meetings.** A CEP kick-off meeting will be held in February 2017. Subsequently, the MAC will schedule five meetings (about every two to three months) with the CEP starting in May 2017. Four of these meetings will take place following the public input events to allow for a group discussion (debrief) of “what we heard” at the previous public input event and also a kickoff for the next project milestone phase. One additional CEP meeting will be held that does not occur following a public input event. At least two weeks prior to each CEP meeting, the M&H Team will work with the MAC staff to identify specific goals and objectives for the meeting. The dates, times and locations of these meetings will be posted on the project website and the meetings will be open to members of the general public who may attend as observers. If a change is made to the CEP meeting date, a notification will be sent through the E-news subscription service to all project subscribers. Presentation materials including PowerPoint slides, graphic boards, and handouts will be posted to the project webpage no later than 3 days following the meeting. The M&H Team will be responsible for developing draft meeting minutes for the MAC. The MAC will post the approved meeting minutes to the project webpage within 14 days.

**Public Meeting Events.** As noted above, each milestone will culminate in a public meeting event. A date, time and location will be determined for each public meeting event at least 21 days before the event. As soon as a date, time and location are determined for the event, the information will be shared in several ways:

- **Posted on the project website**
- **Sent out through the E-news subscription service to all project subscribers**
- **Emailed to CEP members and members of the MAC Commission**

- **Publishing a notice in the following papers: St. Paul Pioneer Press, Stillwater Gazette, and Oakdale/Lake Elmo Review**

This section describes a standardized method of communicating with the general public about the EA/EAW process. This system is described and shared so that interested citizens can stay informed at every point in the process. The following sections provide more information about each of the communication outreach platforms, the public milestone events, and ways to provide input into the EA/EAW process.

## 6. Project outreach platforms

The MAC, in coordination with the M&H Team, will communicate through the following platforms:

**In-Person Presentations:** In-person presentations will be made by members of the MAC staff and the M&H Team prior to key milestone events at regular MAC Commission or Committee meetings and at CEP meetings following key milestone events. Presentations are expected to include PowerPoint slides, handout material and question and answer sessions. The public may attend these meetings and public input will follow the established protocols governing public comments during the meeting.

Additional presentations by members of the MAC staff and the M&H Team may be made to City Council/Committee meetings, Township Board meetings, County Board meetings, and Metro Council meetings on request. If these events are scheduled, they will be noted on the project webpage and a notice will be sent out via the E-news subscription service to all subscribers.

**Special presentations for elected officials:** Special presentations for elected officials will be held at noon or early afternoon on the day of each public milestone event to provide a preview of information to be presented. Invitations will be sent directly to elected officials approximately two weeks in advance of the event.

**Project Newsletters:** Project newsletters will be developed and printed in advance of the four project milestone events. Each newsletter will include information about the upcoming milestone event such as date, time and location as well as messages and content associated with the public milestone event and supporting graphics and photographs. Each newsletter will also provide information about subscribing to the E-news subscription service and about the project webpages.

The first of the four newsletters will be mailed directly to homes and businesses in the City of Lake Elmo, Baytown Township and West Lakeland Township. A printed copy of all four newsletters will be available at public locations at least seven days before each public milestone event and will be posted on the project webpage. (The second, third and fourth newsletters will not be distributed through a direct mail.)

Newsletters will contain four (4) pages and ½ page will be reserved for mailing space. Printed newsletters will be produced on an 11 x 17 sheet size, folded in half.

# Stakeholder Engagement Plan

## **Project Website:**

A set of project website pages will be maintained during the EA/EAW process to share information. The pages will be accessed through the current Lake Elmo website page of the [Metroairports.org](http://Metroairports.org) website. At a minimum, the webpages will include:

- **Public meeting information**
- **Public project documents (reports, newsletters, presentations, fact sheets, etc.)**
- **Frequently asked questions**
- **Information on how to provide public comment**
- **Information on how to sign up for the E-news subscription service notifications (see below)**

**E-news subscription service:** A project account will be made available by the MAC for the Lake Elmo Airport EA/EAW project using the E-news subscription service. Stakeholders and members of the public will be informed of the opportunity to subscribe. Also, email addresses will be collected at public meetings and added to the E-news subscription service account if permission is granted on the sign-in sheet (check box to be added). A monthly project update will be sent out through the E-news subscription service to all project subscribers. Additional notifications will be sent out if information is time sensitive.

**Public Notices:** Public notices will be developed in advance of key milestone events by the MAC with input from the M&H Team and will be distributed by the MAC to media outlets in and around the project area. Public notices will include information about public meeting logistics as well as EA/EAW project messages.

## **7. Project milestone events**

Critical project milestones are established based on decision points in the EA/EAW process that require stakeholder consideration. At each milestone, there is a strategic engagement event in the project timeline which will provide an opportunity for public participation and input. The format for each event may vary. At least two weeks prior to each milestone event, the M&H Team will work in cooperation with the MAC staff to identify specific event goals and objectives and recommend a meeting format based on the goals and objectives. Possible formats include an open house event, a presentation with a question and answer session, or a public hearing with a formal public comment option.

The EA/EAW engagement process is built around the four project milestones. The timeline presented here is a general framework based on assumptions and expectations that may change over the course of the project. If the timeline changes, the new timeline information will be posted to the project webpage and a notification will be sent out through the E-news subscription service.

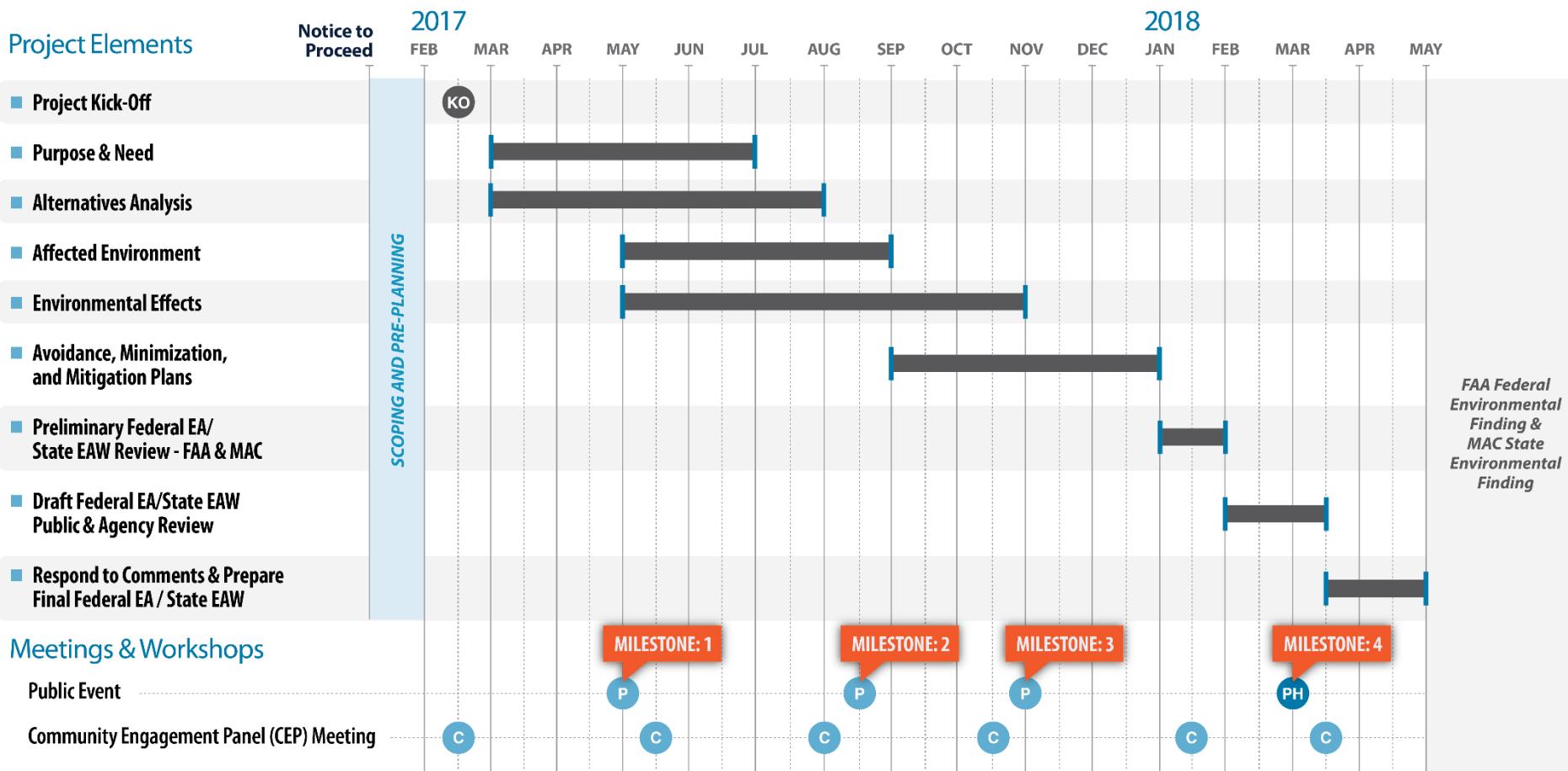
- **Milestone 1: Introduction to the NEPA process.** This first milestone event is a project kick-off meeting that introduces the MAC staff and the M&H Team to the community and helps

## Stakeholder Engagement Plan

the public understand the MAC's commitment to a transparent, open process. This milestone will explain the NEPA and MEPA processes, including the anticipated project timeline, opportunities for public input, environmental analysis categories, how and why alternatives are considered, how an EA/EAW differs from the airport planning process and the possible outcomes of the EA/EAW process. This milestone event is expected to take place in Month 2 of the process – allowing time during Month 1 for preparation and community outreach.

- **Milestone 2: Purpose & Need and Alternatives**. This second milestone event will be held to present the Purpose & Need of the project and to introduce the alternatives that will be considered in the EA. This milestone event is expected to take place in Month 5 of the process, although work will begin toward it beginning in Month 1.
- **Milestone 3: Environmental Effects**. This third milestone event presents the outcome of the technical analysis of the environmental categories for the preferred alternative and the no-action alternative. This milestone event is expected to take place in Month 8 of the process.
- **Milestone 4: Public Hearing**. The fourth milestone event occurs during the 30-day public review of the draft EA/EAW. The draft document, including information about the preferred alternative, will be presented at this event. The M&H Team will develop specific public hearing protocol guidelines that will be distributed to all participants. For example, the guidelines would include an announcement such as “all comments are being recorded and will be responded to in writing in the draft EA and posted on the project website.” This milestone event is expected to take place in Month 12 of the process. Following the public hearing, the draft EA document is expected to be revised and submitted to the FAA in Month 14 of the process. The EAW will also be completed and submitted to the State of Minnesota.

# EA Project Timeline



Note: Schedule updated October 24, 2017. Subject to change.

- Time Frame
- Public Event
- Kickoff Meeting
- Community Engagement Panel (CEP) Meeting
- Public Hearing



Environmental Assessment  
Lake Elmo Airport



## 8. Communication platforms – public input

Throughout the EA/EAW process, the MAC and the M&H Team will gather input through a variety of specific input streams:

- **Public comment via the project website**
- **Written public comment mailed to an address posted on the project website and provided via other methods (i.e. newsletters, at public events)**
- **At public engagement events. Note: The public comment process will vary depending on the event format and may include written comment forms, a verbal statement made during a public comment window, or a comment made to a court reporter.**

While many opportunities will be provided for public input, the MAC staff and the M&H Team will not respond directly to individual comments. Rather, comments will be addressed in one or more of the following ways:

- **Comments may be addressed as part of the FAQs offered on the project website.**
- **Comments will be reported in the draft EA with a written response.**
- **Comments may be answered verbally as part of a question and answer session in a public meeting.**

This policy supports the desired outcome of a transparent process by making the same information available to all members of the public, by presenting information that is consistent through the project and by creating a process to consistently document all comments and responses (see Section 9).

If a comment is received from an elected official or similar individual representing a group of stakeholders or citizens, the MAC may offer a written comment in response during the project. In this case, both the written comment and the written response will be posted on the project website for public review.

## 9. Approach to documenting and incorporating public feedback

**Documenting:** The M&H Team will collect, organize and save public comments received during the Lake Elmo Airport EA/EAW project and will also collect, organize and save responses provided by the MAC if applicable (see Section 8). A master spreadsheet will be developed to track input. The spreadsheet will note the submitter name, date received, and method of input (i.e. written letter, website comment, public meeting, response to comment, etc.) as well as information such as address, zip code or email address that may be provided with the comment.

**Incorporating Public Feedback:** The goal of the Stakeholder Engagement Plan is to foster collaboration and build stakeholder trust and support. Public comment is a valuable part of an EA/EAW and each comment will be thoughtfully considered. During the course of the Lake Elmo EA/EAW, public comment will be considered and incorporated as follows:

## Stakeholder Engagement Plan

In some cases, concerns and objections expressed through the public comment process indicate a lack of understanding or a misunderstanding on a specific topic. In this instance, the MAC will refine the FAQs on the project website, issue a press release, include more information at the next milestone event and/or include the topic as an agenda item at a CEP meeting in order to get more information out to the public.

In some cases, public comments express support or opposition to the project and may include reasons for the opinions. These opinions are welcome and they may provide valuable insight for the EA/EAW in terms of both project benefits and areas where concerns may need to be mitigated.

In other cases, public comments may raise a new issue or provide information that needs to be considered in the EA/EAW evaluation process. These comments will be vetted by the MAC and the M&H Team and included in the EA/EAW evaluation process as appropriate.

A written response to each comment will be provided in the draft final EA except that similar comments on a common theme may be grouped together and addressed with one collective response.

## Lake Elmo Airport EA/EAW Newsletters



The following pages contain newsletters distributed publicly prior to the public events during the following months:

- April 2017
- August 2017
- November 2017

The first newsletter was mailed to all residents within a two mile radius of the airport, with the subsequent newsletters distributed electronically via a subscription list accumulated from sign-ups on the project website and at the public events. Hard copies of each newsletter were also made available to the public at each public event, and were placed at Lake Elmo City Hall, Lake Elmo Public Library, and Baytown Community Center.



# Lake Elmo Airport

APRIL 2017  
**ENVIRONMENTAL ASSESSMENT NEWS**



## Lake Elmo Airport Environmental Assessment Work Begins

In 2016, the Metropolitan Airports Commission (MAC) adopted a Long-Term Comprehensive Plan (LTCP) for Lake Elmo Airport. The LTCP provides guidance and a roadmap for possible airfield improvements over the next 20 years. Specifically, the LTCP proposes the following improvements:

- ④ **Relocate and extend Runway 14/32 to 3,500 feet**
- ④ **Realign 30th Street North around the relocated runway protection zone**
- ④ **Construct new taxiways**
- ④ **Convert the existing runway to a parallel taxiway**
- ④ **Reconstruct and extend crosswind Runway 4/22 to 2,750 feet**
- ④ **Upgrade instrument approaches to use newer technology**

However, before these improvements can be made, the MAC needs to study the possible environmental effects associated with them.

Information developed for and presented in the LTCP provides the basis for the environmental review.

### The Environmental Process

With the LTCP complete, the MAC can now begin the environmental review process.

The National Environmental Policy Act (NEPA) process is used by the federal government to determine whether proposed projects—in this case the Lake Elmo Airport airfield improvements—will have significant environmental effects. In order to qualify for federal funding, the Lake Elmo Airport improvements project must undergo a NEPA review.

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COMMUNITY EVENT  
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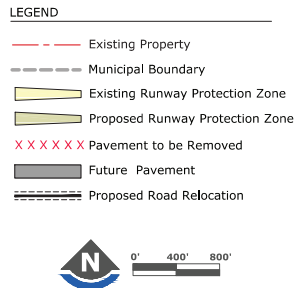
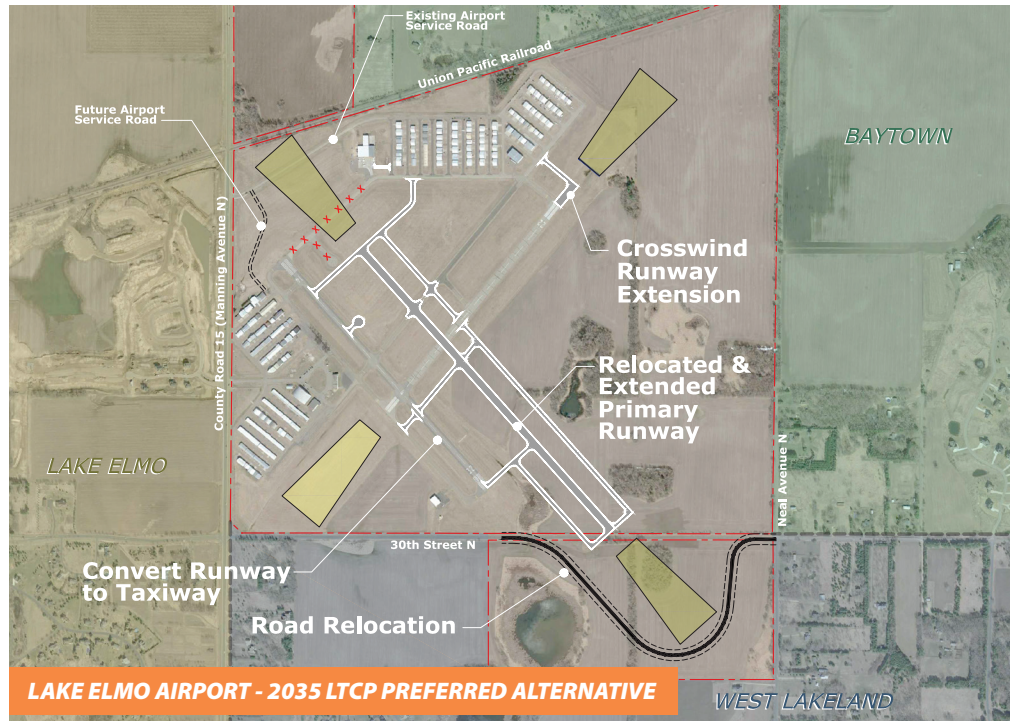
**Thursday,  
May 11, 2017  
6:00 to 8:00 p.m.  
(Presentation at 6:30)**

**Stillwater Area High  
School, 2nd Floor  
Rotunda & Forum Room  
5701 Stillwater Blvd N.  
Stillwater, MN 55082**

Project Website 

[www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx)





LAKE ELMO AIRPORT - 2035 LTCP PREFERRED ALTERNATIVE

# Lake Elmo Airport Environmental Assessment Work Begins

CONTINUED FROM PREVIOUS PAGE

The NEPA process covers 14 environmental categories that include related social and economic effects. The categories include:

- Air Quality
- Biological Resources (including fish, wildlife, and plants)
- Climate
- Coastal Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historic, Architectural, Archeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Compatible Land Use

- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety
- Visual Effects (including light emissions)
- Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)

Based on the nature of the proposed improvements, the Federal Aviation Administration (FAA)—the responsible federal agency in this case—has determined that an Environmental Assessment (EA) is required. An EA addresses the purpose and need of the project by considering a range of alternatives. It then determines whether or not the proposed alternative has the

“MAC has begun the EA/EAW process, which will involve extensive public outreach and opportunities for public involvement.”

potential to cause significant environmental effects compared to a no-action (status quo) alternative.

If the FAA finds that the project would have no significant environmental impacts, the NEPA process is concluded and the project is eligible for federal funding. After completing the NEPA process, the decision to move forward with the project is made at the local level.

The Minnesota Environmental Policy Act (MEPA) and related Minnesota Environmental Quality Board (EQB) guidelines also require project proposers to complete environmental reviews for various types of projects. To meet state requirements, an Environmental Assessment Worksheet (EAW) is required for the Lake Elmo Airport airfield improvements because it includes construction of a new paved runway. As such, the MAC will complete the state EAW requirements simultaneously with the Federal EA.

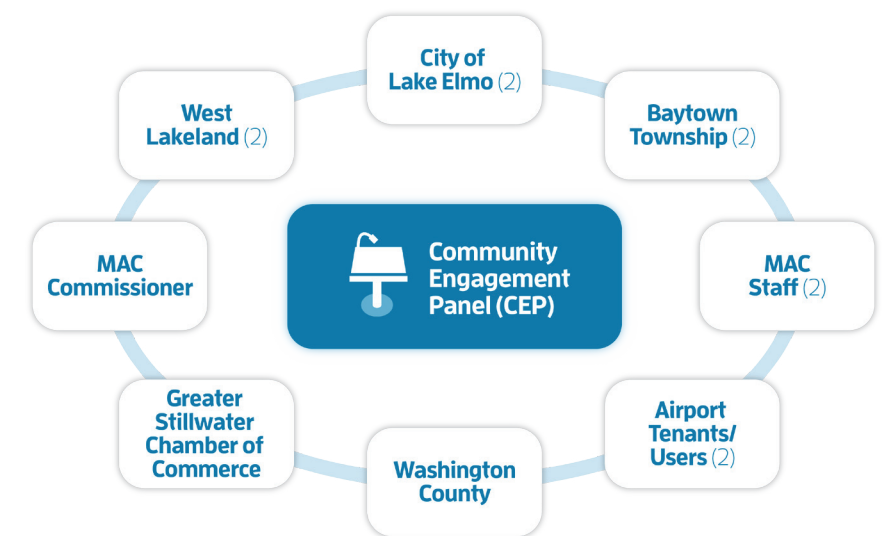
The MAC has begun the EA/EAW process, which will involve extensive public outreach and opportunities for public involvement. More specific project information is provided on the project website at [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx).

## Community Engagement Panel (CEP)

Environmental review projects always benefit from the participation of a range of stakeholders. Stakeholders for this project include affected cities, townships, and counties, businesses, airport users, and, of course, members of the community.

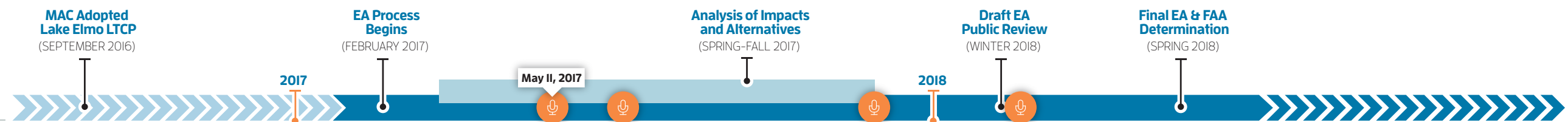
To facilitate stakeholder engagement and participation, the Metropolitan Airports Commission has established a Community Engagement Panel (CEP). This panel, representing major community stakeholder groups, will serve in an advisory role. The CEP members serve several functions, including receiving and then sharing information about the environmental process with their individual constituencies; providing input to the process as the voice of key stakeholders; and, in some cases, providing technical advice to the MAC's consultant team.

The Lake Elmo Airport CEP is composed of representatives from the following organizations/stakeholder groups:



The first CEP meeting occurred in February, with six more to follow. To learn more about how you can share your thoughts and ideas during this process, visit the project website at [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx).

## Anticipated EA Project Timeline



Public Event

For more detail, see the Stakeholder Engagement Plan on the project website. Schedule is subject to change. Any significant schedule updates will be published on the project website and distributed to e-news subscribers, as appropriate.



**Metropolitan Airports Commission**  
**6040 28th Avenue South**  
**Minneapolis, MN 55450**

## Community Event

**Thursday, May 11, 2017**  
**6:00 to 8:00 p.m. (Presentation at 6:30)**  
**Stillwater Area High School**  
**2nd Floor Rotunda & Forum Room**  
**5701 Stillwater Blvd N.**  
**Stillwater, MN 55082**

We want your input! The MAC is committed to a transparent and open community involvement process. The purpose of this first community event is to provide information and to give community members an opportunity to ask questions.

When arriving at Stillwater Area High School, please park in the main lot and enter through the Administration entrance in the middle of the front plaza. There will be a presentation at 6:30 p.m. where community members can learn more about the proposed project, the NEPA and MEPA processes, environmental analysis categories, how and why alternatives are considered, the anticipated project timeline and opportunities for public input. The event is open to the public and all interested parties are encouraged to attend. ■

## Stay Involved

The best way to *keep current on what's happening with the project is to sign up to receive updates via our e-news subscription program. Go to the project website to sign up.*

Regular updates will be sent to this email list, including notices about public events. You can also find up-to-date information such as public event details, public project documents (reports, newsletters, presentations, fact sheets, etc.), answers to frequently asked questions, and information on how to provide public comment on the project website.

Project website: [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx) ■



# Lake Elmo Airport

AUGUST 2017  
ENVIRONMENTAL ASSESSMENT NEWS



## Lake Elmo Airport Environmental Assessment Work in Full Swing

Since the public event in May, the Lake Elmo Airport Environmental Assessment project team has been busy developing the project's Purpose and Need Statement, as well as analyzing alternatives for meeting project goals. (For a recap of the proposed improvements, please see the [April 2017 newsletter](#).) The team has developed several alternatives that will be carried through the environmental review process. These alternatives will be the subject of the next public event scheduled for August 17.

To ensure a thorough review and to fully consider community and stakeholder input, the team closely evaluated the types of aircraft and the number of aircraft operations forecasted for Lake Elmo Airport. As a result of input provided by the public and Community Engagement Panel members, we've expanded the range of alternatives being considered for both Runway 14/32 and 30th Street North.

The project team has also been researching and collecting data regarding environmental resources that may be affected by the project. This includes

field surveys of wetlands, plant species, historical structures, and other resources in areas around the airport. This information will be used to compare alternatives to ensure the implementation of the project avoids or minimizes environmental effects to the greatest extent possible. A broader discussion of the environmental data collected will be the subject of the third public event, tentatively scheduled for November. An updated [schedule](#) is available on the [project website](#). ■

PUBLIC EVENT

Thursday,  
August 17, 2017  
6 to 8 p.m.  
(Presentation at 6:30)

Oak-Land Middle School  
Auditorium  
820 Manning Ave. N.  
Lake Elmo, MN 55042

Project Website 

[www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx)



The Purpose and Need Statement is the foundation of an environmental assessment. It should clearly and concisely explain why a project is being proposed and should be understandable to those unfamiliar with aviation. The *purpose* is a general statement of over-arching project goals. The *need* is a more detailed statement describing problems that would be solved by implementing the project.

## What is the Project's **PURPOSE** and **NEED** at Lake Elmo Airport?

### The **PURPOSE** of the proposed improvements:

- 1 Address and attend to the airport's failing, end-of-life infrastructure;
- 2 Enhance safety for airport users and neighbors; and
- 3 Improve facilities for the types of aircraft using, and expected to use, the airport.

### The **NEED** for the proposed improvements:

- 1 Existing runway pavements are deteriorating and, for safety's sake, need to be replaced.
- 2 The primary runway has several incompatible land uses within its runway protection zones (RPZs), including a railroad and two public roads.
- 3 The existing runway lengths do not meet the needs of current aircraft operators and their aircraft.
- 4 The airport lacks the most current navigational technology for landing aircraft. ■

### PURPOSE OF THE PROJECT: Ensuring Safety and Utility for one of Minnesota's Busiest Airports

According to the Minnesota Department of Transportation (MnDOT), Lake Elmo Airport is one of 83 [intermediate airports](#) in the state. Of those, Lake Elmo is the fourth busiest and ranks second for the number of aircraft that call it home. However, when ranked by primary runway length, Lake Elmo is at the back of the pack.

At 2,849 feet, only four intermediate airports have shorter primary runways than that of Lake Elmo's. The average length of Minnesota primary runways at intermediate airports is 3,654 feet—805 feet longer than Lake Elmo's. As one pilot told us, regarding the proposed runway length, it's the difference between an *extremely short* runway and just a *short* runway.

Understandably, some airport neighbors have expressed concern about a longer runway (3,500 feet total) attracting larger jet aircraft, which don't currently operate at the airport. In reality, nearly all jet aircraft need significantly more than 3,500 feet to safely and efficiently take off and land. Lake Elmo's primary runway—at 3,500 feet—has been designed for propeller-driven airplanes that weigh less than 12,500 pounds and have fewer than 10 passenger seats—the same class of aircraft using the airport today.

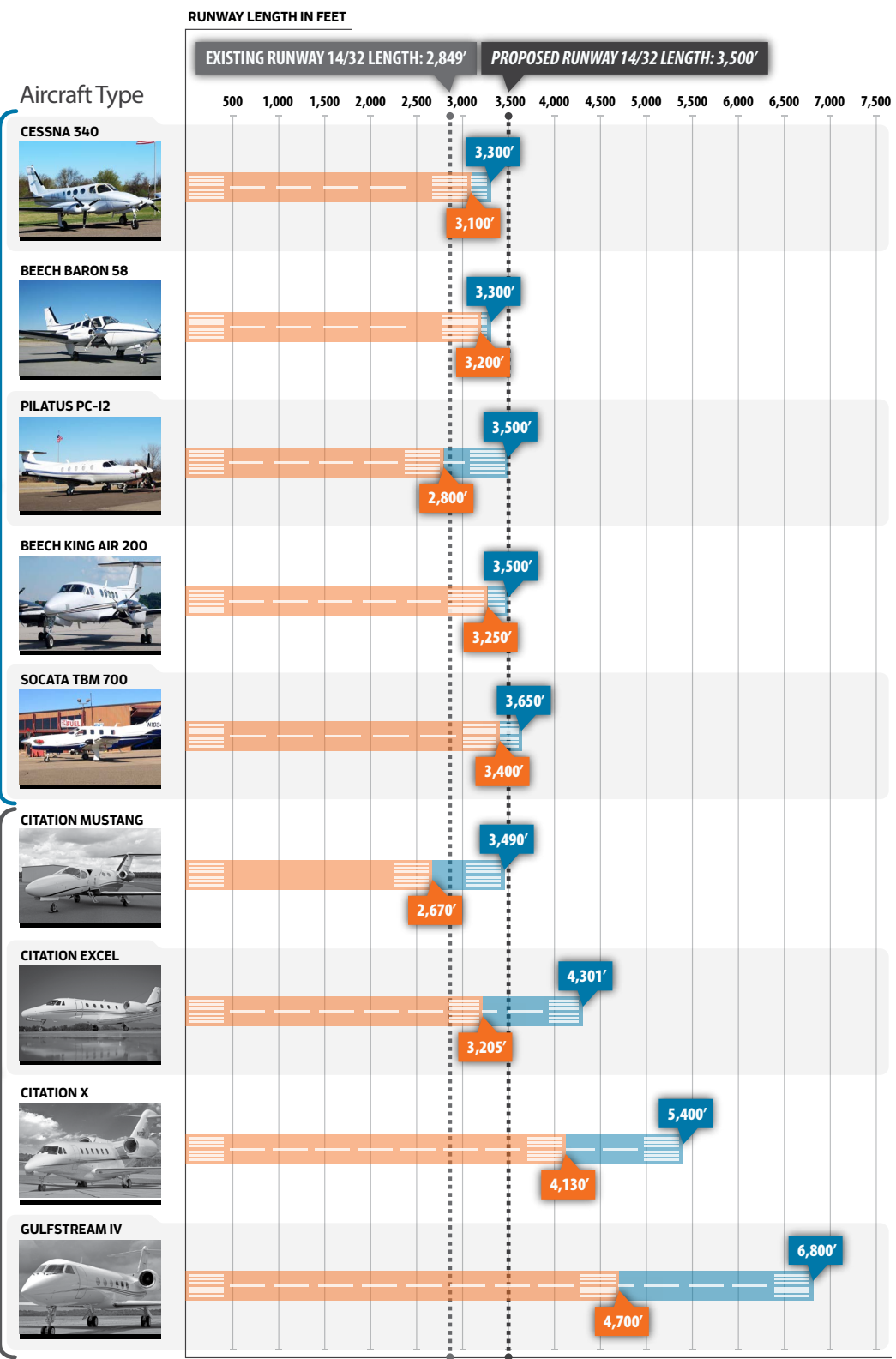
The graphic on the next page shows the required runway lengths at 60 percent and 90 percent useful load. Useful load is one way to measure how safely and effectively an aircraft can operate on a specific runway length in various weather conditions. The allowable useful load represents the number of passengers and weight of cargo a plane can carry while still operating safely. Fuel on board is also part of the useful load equation, which directly affects how far an aircraft can travel. Useful loads below 60 percent severely limit an aircraft's ability to fulfill its purpose.

**As the graphic shows, larger jet aircraft could not safely operate on the proposed extended runway in nearly all scenarios. The ultimate goal of the runway extension is to increase the margin of safety for the aircraft currently operating at the airport. ■**

### Typical Runway Length Requirements For Different Types of Aircraft

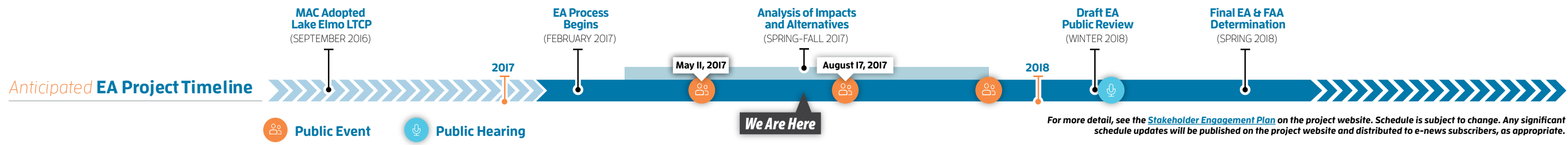
DESIGN AIRCRAFT

JET AIRCRAFT



60% USEFUL LOAD  
90% USEFUL LOAD

NOTE: Propeller-driven aircraft runway lengths are based on accelerate-stop distances and jet-driven aircraft runway lengths are based on balanced field length takeoff distances, as identified in the respective aircraft performance manuals. Accelerate-stop distance is the length required to accelerate from a full stop to near lift off speed and then decelerate to a full stop. Balanced field length considers the accelerate-stop distance along with other safety factors as required for federal certification of these larger aircraft types. Lengths are calculated for a temperature of 82.3° Fahrenheit, a field elevation of 933 feet above mean sea level, and typical takeoff flap settings.



For more detail, see the [Stakeholder Engagement Plan](#) on the project website. Schedule is subject to change. Any significant schedule updates will be published on the project website and distributed to e-news subscribers, as appropriate.



# How a Preferred Alternative is Selected

Environmental reviews typically evaluate more than one scenario—or alternative. In this case, eight alternatives are currently being considered for the primary runway and five alternatives for 30th Street North. After an initial evaluation, a preferred alternative for each will be selected to carry forward. The other alternatives will then be dismissed. Public input is important when determining a preferred alternative. The project’s conformance to FAA design standards and its effect on safety and airport operations are also critical. ■

*“Public input is one of the factors when determining a preferred alternative.”*

## 30th Street North

**A significant concern we heard** throughout the long-term comprehensive planning process and this environmental review process **is the effect the realignment of 30th Street North will have on travel time and safety. Taking these concerns into consideration, the project team has developed several roadway design options that minimize travel time and maximize safety, while meeting project goals.** The road realignment alternatives will be presented at the August 17 public event. ■

## Public Invited to Attend Event – August 17

The next opportunity for the public to learn about and provide input to the Lake Elmo Airport Environmental Assessment will occur on Thursday, August 17 at the Oak-Land Middle School Auditorium. The event begins at 6 p.m. with a presentation at 6:30 p.m. Community members will have an opportunity to ask questions both before the presentation (one on one) or during the question and answer period following the presentation. We would be pleased to have you join us.

Based on feedback received at the May event and from the Community Engagement Panel, we are making some changes for the second public event. The focus of the evening will be to explain the Purpose and Need for the proposed improvements and introduce the alternative scenarios being considered, including alternatives for primary Runway 14/32 and 30th Street North.

**Thursday, August 17, 2017**  
**6 to 8 p.m. (Presentation at 6:30)**  
**Oak-Land Middle School Auditorium**  
**820 Manning Ave. N.**  
**Lake Elmo, MN 55042**

Parking is available in the front lot on the east side of the school. The auditorium is just inside the main entrance. ■



## FAQs Updated on Project Website

A number of frequently asked questions and their answers have been added to the project website. These represent many of the questions asked at the May event and those we’ve received online. Examples include:

- **How will aircraft noise be evaluated in the Environmental Assessment?**
- **Can the airport restrict certain types of aircraft or operations to certain times?**
- **What type of aircraft operate at the airport today? Is this expected to change?**
- **Why not simply rehabilitate the runway without extending it?**
- **Will the planned improvements have an impact on the value of my property?**
- **What are the social and economic benefits of the Lake Elmo Airport?**

Visit the [Frequently Asked Questions](#) page of the website to browse all questions and answers. Have a question that’s not listed? Submit your question or comment by emailing [ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org). ■



# Lake Elmo Airport

NOVEMBER 2017

## ENVIRONMENTAL ASSESSMENT NEWS



### *Evaluating Environmental Effects of the Proposed Development at Lake Elmo Airport*

Over the past six months, the Lake Elmo Airport environmental review project team has been busy collecting and analyzing data to determine the environmental effects of the changes (shifting the primary runway and extending it to 3,500 feet) compared to a no-change scenario (what the Federal Aviation Administration, or FAA, calls a “no-action” alternative). Their work has included field surveys of wetlands, wildlife, plant species, historical structures, archaeological resources and hazardous material sites on and surrounding the airport. It also included detailed analysis of changes in aircraft noise exposure, operational and construction emissions, ground (or roadway) transportation, and other research and analysis. As required under the National Environmental Policy Act (NEPA), this environmental evaluation determines whether any potential environmental effects associated with the proposed changes are significant enough to necessitate a greater level of environmental analysis.

### **How are environmental effects evaluated?**

The FAA establishes thresholds of significant effects for many of the environmental categories. Projects funded fully or in part by the FAA that result in effects at or above these thresholds must either reduce effects below threshold levels or be evaluated further. Since thresholds do not exist for all environmental categories, the FAA has also established factors that should be considered when evaluating the context and intensity of potential environmental effects. For example, the FAA has specific quantitative criteria establishing whether noise effects associated with a project are considered significant (a threshold), while visual effects are evaluated more qualitatively based on the degree to which the project would create annoyance, interfere with normal activities, and affect the visual character of the area (a factor). After all relevant thresholds and factors have been considered, the FAA is responsible for taking action on the environmental document and determining whether the proposed changes to the airport would lead to significant environmental effects.

It is important to note that only environmental effects that meet the FAA’s definition of a *significant impact* would require further action. ■

Project Website 

[www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx)

# Environmental Effects Evaluation Process

**1** Is the environmental category relevant to the proposed development?



- Environmental Category Relevant
- Collect Data
  - Evaluate Effects
  - Determine Required Permitting/Mitigation

**2** Are effects "significant" based on FAA-established thresholds and factors?



- Significant Effects Considering FAA Evaluation
- Federal Aviation Administration (FAA) Conducts Environmental Impact Statement (EIS)

## What environmental categories have been evaluated?

The National Environmental Policy Act (NEPA), which governs this evaluation process, covers 14 environmental categories, including:

- Air Quality
- Biological Resources (including fish, wildlife, and plants)
- Climate
- Coastal Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historic, Architectural, Archeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Compatible Land Use
- Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety
- Visual Effects (including light emissions)
- Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)

Of these 14 categories, five required minimal review based on FAA guidance and therefore will not be evaluated in detail. The environmental review document will include a detailed analysis for the remaining nine categories.

Thus far, members of the public have expressed concerns related to Land Use, Noise, Visual Effects (including airfield lighting) and Water Resources. Following is a summary of the environmental review results within these areas. Results for the remaining categories will be included in the draft environmental review document, which will be published in early 2018 for public comment.

## Land Use

The primary concerns surrounding land use include residential, ground transportation and wildlife attractants. The FAA has not established thresholds or factors of significance to consider for land use impacts. The FAA typically looks to the results of other related categories to determine whether there is a significant impact within the Land Use category. For instance, effects to public parks, historical sites and farmlands are established under other environmental categories, but may also be considered effects within the general land use category.

## Residential Land Uses

The State of Minnesota has established model safety zones for land surrounding airports. The intent is to restrict land uses that could be hazardous to airport operations and to protect the safety and property of people on the ground. While zoning regulations are not currently in effect at Lake Elmo Airport, the Minnesota Department of Transportation (MnDOT) recommends they be adopted by communities within close proximity to an airport. The Metropolitan Airports Commission (MAC) will convene a Joint Airport Zoning Board (JAZB) prior to completion of the environmental process consistent with Minnesota state statutes. The process will consider public input during development of an airport zoning ordinance. This process could result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state's model zoning ordinance.

Until then, the environmental document will use the state's model zoning ordinance to evaluate the environmental effects. There are two safety zones in the state's model ordinance: Safety Zone A generally prevents the erection of new structures while Safety Zone B generally prevents high-density residential development. When considering the airport's proposed development, five houses would end up in the state's model Zone A and 20 houses in the state's model Zone B.

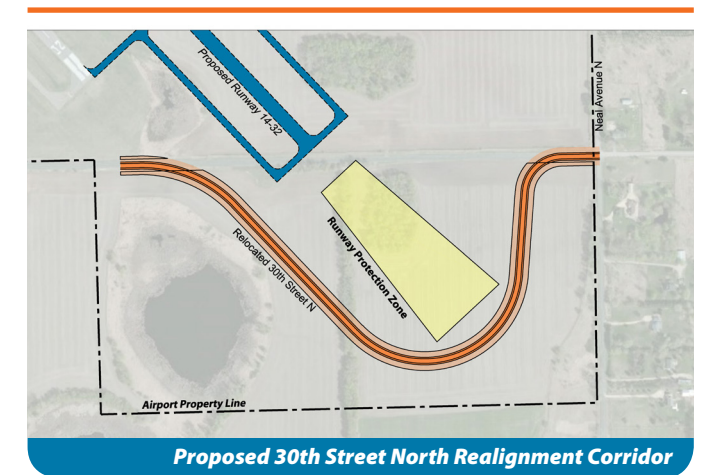


## Ground Transportation Land Uses

The project team also completed a focused study on the realignment of 30th Street North to determine if the proposed changes would have adverse impacts to traffic safety and efficiency, as well as emergency response. This included reviewing existing traffic data and emergency routes, analyzing traffic counts and forecasts, and computing and documenting emergency response times. The project team then explored alternate roadway configurations meant to minimize travel time and maximize safety — two concerns identified by the community as important factors when evaluating alternatives.

In August, the team presented several roadway design options to the Community Engagement Panel (CEP), all of which improved upon the safety and efficiency of the preferred alternative identified in the Long-Term Comprehensive Plan. Since the CEP did not unanimously support any of the alternate options, the original configuration has been retained and used for the environmental effects evaluation.

The proposed design of the realigned section of road can accommodate the forecasted number and type of vehicles. The realignment will slightly increase average travel time along 30th Street North—by approximately 46 seconds in either direction.



## Anticipated EA/EAW Project Timeline



For more detail, see the Stakeholder Engagement Plan on the project website. Schedule is subject to change. Any significant schedule updates will be published on the project website and distributed to e-news subscribers, as appropriate.



### **Wildlife Attractants**

Land uses that attract wildlife, such as refuges, landfills, and lakes, can present hazards to aircraft operations. The proposed development does not create any new wildlife attractants at Lake Elmo Airport. In fact, the reduction in agricultural farmland and the on-airport tree removal associated with the proposed development is expected to reduce wildlife attractants on the airport.

### **Land Use Conclusion**

Based on the results of the analysis for this category, there are no FAA-defined significant land use effects associated with the proposed airport development; however, under the no-action alternative, 30th Street North, Manning Avenue and the railroad would remain in the primary runway's protection zones, which would be considered incompatible by FAA design standards.

### **Noise**

Noise contours delineate areas on and surrounding an airport that experience different average noise levels associated with an airport's aircraft activity. These contours are based on an FAA-approved program that uses a myriad of data inputs to calculate the results. The contours, however, do not depict specific flight paths or the loudness of individual aircraft operations.



The process of calculating the average noise level is called "noise modeling." The result is a metric that describes aircraft noise in annual Day-Night Average Sound Level (DNL). The FAA considers an increase of 1.5 DNL or above significant when applied to noise-sensitive areas—like residential homes—that are located within the 65 DNL contour. In the case of Lake Elmo Airport, the project team modeled the forecasted change in DNL that would result from implementing the proposed development at the airport and compared it with the noise levels that would occur if no development were to occur (the no-action alternative) for the same timeframe. Based on both existing and 2025 forecast operations, the results show that the 65 DNL contour is contained entirely on airport property in both scenarios. This means that there are no impacts—either now or in 2025—to noise-sensitive areas within the 65 DNL contour, and therefore no mitigation would be required. A 60 DNL contour was developed for informational purposes, but is also entirely contained on airport property in the 2025 proposed development scenario.

### **Visual Effects (including airfield lighting)**

There are no federal standards that specifically define the significance of



airfield lighting effects; however, according to the FAA, location and use of lighting systems should be considered in environmental reviews. The lighting components of the proposed development include relocating and extending the existing primary runway lights and installing new lights on the crosswind runway. Some of these lights will be closer to residential areas; however, they will only be activated at full brightness when pilots are approaching and departing the airport. This scenario would typically occur only during nighttime or inclement weather operations, which historically accounts for about 15 percent of aircraft operations. The project team is considering various strategies for shielding the lights from the airport's neighbors.

### **Water Resources**

Water resource effects associated with the proposed development include filling approximately two acres of wetlands on airport property (including less than one-tenth of an acre within a mapped floodplain), and adding a net increase of approximately 550,000 square feet of impervious surface at the airport as a result of the proposed runway, taxiway and road pavement. The team expects that the wetland effects will require the MAC to replace those acres elsewhere at a 2:1 ratio. It is most likely to take the form of credits purchased from a wetland bank (a site where wetlands are restored, created or enhanced for the purpose of providing compensatory mitigation for unavoidable impacts associated with projects located elsewhere) in the east central Minnesota region. At the airport, the stormwater effects will require site-specific drainage controls and implementation of best management practices. The groundwater beneath the airport is not expected to be affected or disturbed by the project since it is 50 feet underground.



### **What does all this mean?**

The results of the environmental analysis indicate that there are no substantial effects in any single environmental category that cannot be mitigated. Neither permanent adverse nor significant environmental effects are expected with the proposed development at Lake Elmo Airport. That being said, efforts will be taken, where feasible, to avoid or reduce environmental effects. The next step in the process is to complete the draft environmental review document and publish it for public review. A public hearing will then be held in Spring 2018 to take public comments on the document. All comments received during the comment period will be included and responded to in the final environmental review document. ■

# Lake Elmo Airport EA/EAW Community Engagement Panel Meeting Documentation



The following pages contain agendas, minutes, and presentation slides from CEP meetings held on the following dates:

- February 21, 2017
- May 25, 2017
- August 8, 2017
- October 19, 2017
- January 16, 2018
- May 15, 2018

# Lake Elmo Airport Community Engagement Panel Meeting #1

February 21, 2017  
6:30 P.M.



## Agenda

1. Introductions
2. MAC Purpose & Mission
3. Recap – Long-Term Comprehensive Plan (LTCP)
4. Environmental Process Overview
5. Stakeholder Engagement Plan
6. CEP Guidelines
7. Discussion/Questions



## LAKE ELMO AIRPORT FEDERAL EA / STATE EAW

# Community Engagement Panel

## Meeting #1 Minutes

Lake Elmo Public Library  
February 21, 2017  
6:30 P.M.

### Panel Attendees

John Renwick  
Marlon Gunderson  
Keith Bergmann  
Mary Vierling  
Dave Schultz  
Stephen Buckingham  
Kent Grandlienard  
Ann Pung-Terwedo  
Chad Leqve  
Neil Ralston

### Other Attendees

Dana Nelson  
Joe Harris  
Melissa Scovronski  
Brad Juffer  
Evan Barrett  
Laura Morland  
Colleen Bosold

### Absent Panel Members

Stephen Wensman  
Robin Anthony  
Michael Madigan

### Representing

Airport Tenant/User  
Airport Tenant/User and City of Lake Elmo Resident  
City of Lake Elmo Resident  
West Lakeland Township Resident  
West Lakeland Township Supervisor  
Baytown Township Resident  
Baytown Township Supervisor  
Washington County Public Works Planner  
Metropolitan Airports Commission Director of Environment  
Metropolitan Airports Commission Airport Planner

### Representing

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Mead & Hunt  
Mead & Hunt  
Mead & Hunt

### Representing

City of Lake Elmo Planning Director  
Greater Stillwater Chamber of Commerce  
MAC Commissioner District F

(Sign in sheet attached along with presentation and meeting materials distributed)

*The attached report represents this writer's interpretation of items discussed during the meeting. Any corrections or additional information should be brought to our attention for clarification.*

### **The purpose of the meeting was to:**

- Provide background information on the environmental process and the stakeholder engagement plan for proposed airfield improvements at Lake Elmo Airport.
- Prepare community engagement panel (CEP) members to be the point of contact for information sharing, both to and from the community and MAC, and to respond to inquiries from their constituent groups.

### **Items discussed were as follows:**

After introduction of participants, Chad Leqve provided an overview on the MAC's purpose and mission, as well as the primary role of Lake Elmo Airport; Neil Ralston provided a recap of the Lake Elmo Airport Long-Term Comprehensive Plan; Evan Barrett provided an overview of the environmental process; and Chad Leqve concluded with an overview of the stakeholder engagement plan, a discussion of CEP guidelines and general Q&A as described below.

A CEP member asked about airport runway lighting – whether it is generally ground lighting, whether the lights are always on or only while in use, and whether there are any plans to change what currently exists. Chad Leqve answered that the Airport currently has steady-burning lights along the runway edges and strobe runway end identifier lights (REILs). The runway edge lights are pre-set to low intensity, but can be increased in intensity by pilot remote control. The REILs are pre-set to remain off unless activated by pilot remote control. The Airport also has a rotating beacon, which is always on. There are no plans to change the character of the lighting at the Airport as part of the project.

Stephen Buckingham asked about the frequency of the CEP meetings. During his presentation, Chad Leqve stated that the CEP meetings will take place after each of the four public milestone events. Mr. Buckingham asked whether this statement about meeting frequency constituted a change from the project schedule in the Stakeholder Engagement Plan, which shows six CEP meetings held bi-monthly starting in May. Evan Barrett confirmed that the CEP meetings will be held once every other month, starting in May, as shown in the project schedule. Four of the CEP meetings will occur after a public milestone event, and two additional CEP meetings will be held that do not occur following public milestone events.

Dave Schultz asked if the Township could put project information and updates on its own website. Melissa Scovronski answered that they could include a link to the MAC project website and possibly a sign-up for the E-news subscription, which will also be available on the project website.

A CEP member asked if City of Lake Elmo officials will be represented on the CEP. Chad Leqve answered yes, but that the City of Lake Elmo Planning Director was unable to make it to tonight's meeting, as were the MAC Commissioner and Greater Stillwater Chamber of Commerce representatives.

Kent Grandlienard offered the Baytown Township community building for future meetings, possibly the public meetings for which a larger space is needed. A CEP member asked when and where the first public meeting will be held. Evan Barrett answered that it is shown in the project schedule for late April or early May. The exact date, time and location have not yet been set, but will be publicized at least three weeks in advance of the meeting.

Mary Vierling commented that the CEP composition seems unbalanced as she represents over 200 constituents who have concerns about the potential safety and community effects of the project. Chad



## Meeting Minutes

Leqve explained the rationale for the CEP's composition and stated the intent of convening the CEP is to bring a cross section of stakeholder voices to the table. He also mentioned that the CEP is advisory and, because there will be no roll call votes conducted by the CEP, proportional representation should not be an issue.

Ann Pung-Terwedo commented that the MAC is going a lot farther with the planned stakeholder engagement process than is required, which is above and beyond what she has ever seen, and praised the MAC for that effort.

Mary Vierling expressed concerns that floodwater is up to the road on both sides of 30<sup>th</sup> Street North and that because there is no sewer/drainage system there is nowhere for the water to go.

Dave Schultz asked when the Valley Branch Watershed District (VBWD) would be involved in the process. Chad Leqve responded that there was a separate agency scoping meeting held earlier that day which the VBWD representative attended. The project team received some useful information from the agencies and will coordinate evaluation of effects on water resources with relevant regulatory agencies throughout the process.

Kent Grandlienard asked whether there are exemptions for airports with wetlands at the ends of runways, as the proposed alternative would move the runway end closer to an existing wetland. His understanding was that this is undesirable for safety reasons. He asked further questions about waterfowl and wildlife attractants, and stated that the pond in the new development across Manning Avenue is a significant wildlife attractant. Chad Leqve said that a wildlife hazard assessment will be developed and wildlife hazards will be evaluated during the environmental process in accordance with Federal Aviation Administration (FAA) guidance.

Mary Vierling stated that the Metropolitan Council submitted a comment during the LTCP process mentioning the MAC had 36 acres of wetland on the airport. She asked if it was possible to get an overview of where these wetlands are. Neil Ralston answered that there is a map in the LTCP in Figure 2-10 on Page 2-31 that shows the wetland locations.

A CEP member asked how the environmental review will address affected farmlands. The MAC leases land some of the Airport's land to farmers and could at any time make a business decision to stop leasing that land. Joe Harris replied that the MAC may need to reduce or eliminate some of the agricultural rentals as part of this project.

A CEP member asked about the LTCP showing a re-routing of County Highway 15 (Manning Avenue) for one of the rejected alternatives. This highway is slated for expansion from two lanes to four lanes. Ann Pung-Terwedo said the highway expansion project is currently planned for some time after 2020.

A CEP member asked whether the Manning Avenue expansion issues played into the decision to move the runway. Neil Ralston said that removing Manning Avenue from the Runway Protection Zone (RPZ) is a benefit of relocating the runway, but is not the impetus for the decision. However the expansion of Manning Avenue will likely trigger FAA review if it is not removed from the RPZ.

A CEP member asked if there was a chance the FAA would not require Manning Avenue to be re-routed if the runway were to remain in its existing location. Neil Ralston answered that it is possible, but it is difficult to predict exactly what the FAA's response would be in that scenario.

## Meeting Minutes

Melissa Scovronski asked if she and her team, which will be designing and managing the project website, could use the CEP for feedback on website materials as they are developed. Chad Leqve and the CEP responded that was a great idea and they would be happy to review materials.

### **Next Steps**

Mead & Hunt will finalize the Scope of Work based on feedback received from the CEP and agencies. The CEP will reconvene approximately two weeks after the first public meeting, which will provide an introduction to the environmental process. The MAC intends to schedule these meetings with ample advance notice as described in the Stakeholder Engagement Plan.

The meeting adjourned at approximately 8:00 p.m.

# Lake Elmo Airport Environmental Assessment (EA)/ Environmental Assessment (EAW) Worksheet



February 21, 2017 – Community Engagement Panel Meeting #1  
EA/EAW Process Overview and Stakeholder Engagement Plan

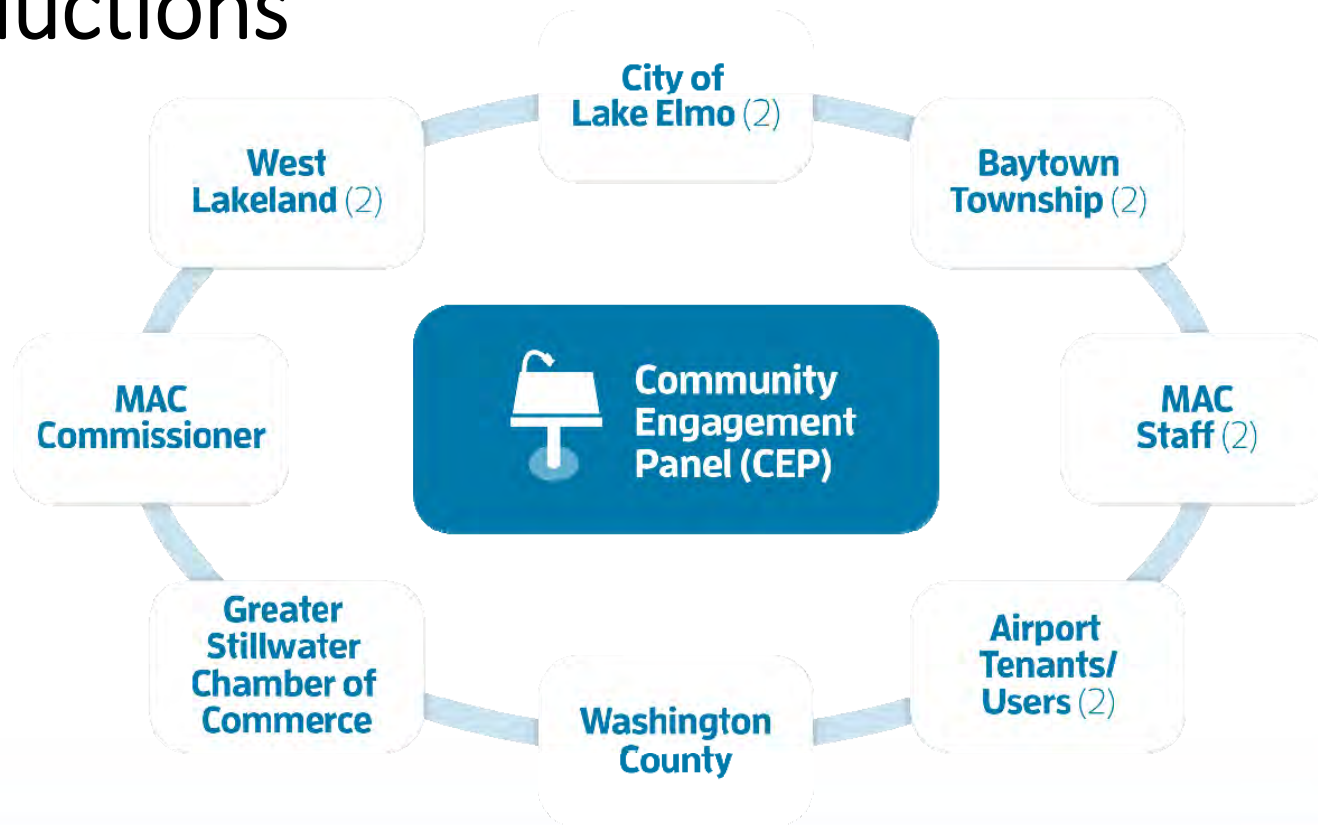


# Agenda

- Introductions
- MAC Purpose & Mission
- Recap – Long-Term Comprehensive Plan (LTCP)
- Environmental Process Overview
- Stakeholder Engagement Plan
- CEP Guidelines
- Discussion



# Introductions



# Metropolitan Airports Commission



We provide and promote safe, convenient, environmentally sound, cost-competitive aviation services for our customers.

- Public corporation created by Minnesota Legislature
- Owns and operates airports within 35 miles of downtown St. Paul and Minneapolis
- MSP International Airport
- Six general aviation airports
- User-fee based funding
- Limited property taxing authority unused since 1960s





# Board Makeup



- Gov. appoints chairman and 12 commissioners (8 metro, 4 outstate)
- Minneapolis and St. Paul mayors each appoint one



# Legislative Mandate to Effectively Enable Aviation



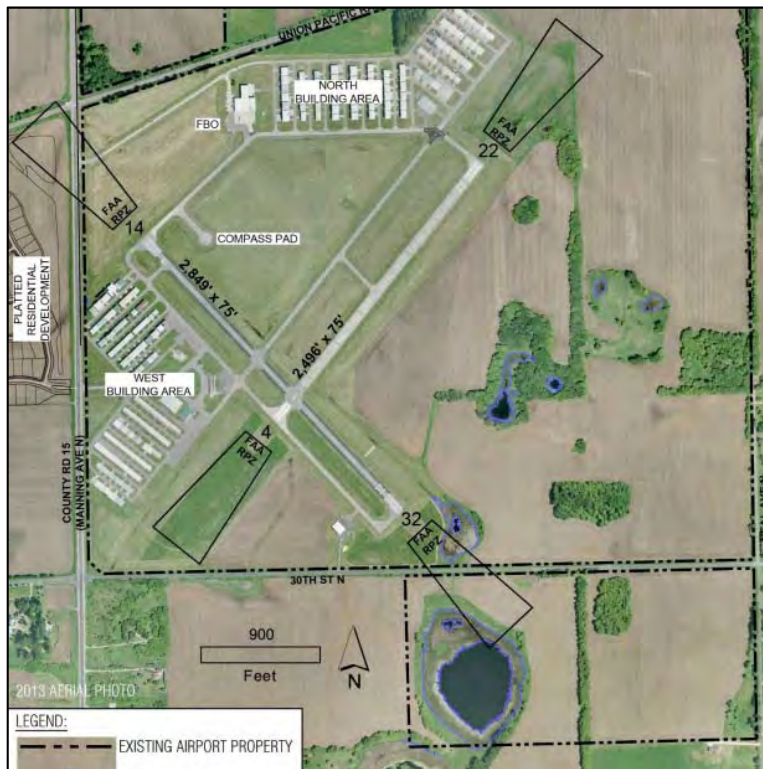
(1) promote the public welfare and national security; serve public interest, convenience, and necessity; promote air navigation and transportation, international, national, state, and local, in and through this state; promote the efficient, safe, and economical handling of air commerce; assure the inclusion of this state in national and international programs of air transportation; and to those ends to develop the full potentialities of the metropolitan area in this state as an aviation center, and to correlate that area with all aviation facilities in the entire state so as to provide for the most economical and effective use of aeronautic facilities and services in that area;

**Minn. Stat. § 473.602**





# Lake Elmo Airport



## Primary Role of Lake Elmo Airport

- Integral part of the regional Reliever Airport system
- Accommodates Personal, Recreational, and some Business Aviation users
- Design Aircraft is and will continue to be small, propeller driven aircraft with < 10 passenger seats
- Role not expected to change in forecast period
- Only public airport in Washington County

## Existing Facility & Activity Level Overview

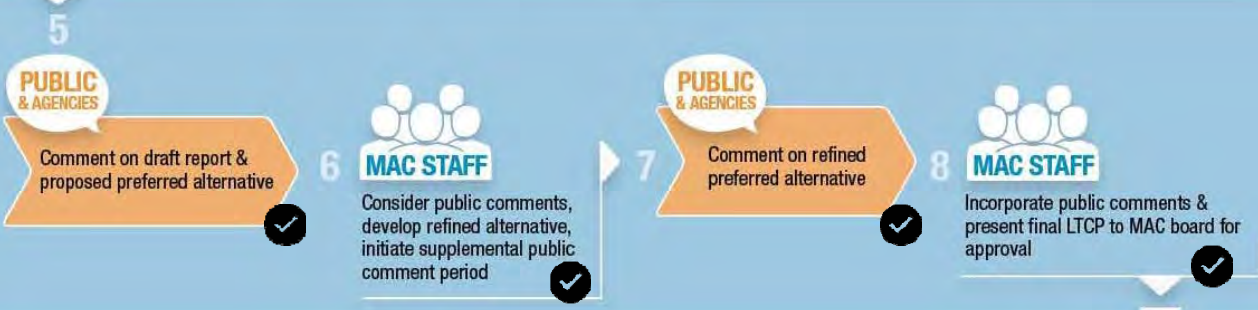
- ~200 Based Aircraft
- ~26,000 Aircraft Operations
- Airport Context



# LAKE ELMO AIRPORT PLANNING AND DEVELOPMENT PROCESS STEP-BY-STEP



- 1 Research & study development alternatives ✓
- 2 Engage MAC board, city staff & other key stakeholders ✓
- 3 Draft report with alternatives including a proposed alternative ✓
- 4 Request formal MAC board approval to publish draft report for public comment ✓



## Long-Term Comprehensive Plan (LTCP)

Planning & Development Process  
Steps 1 through 11



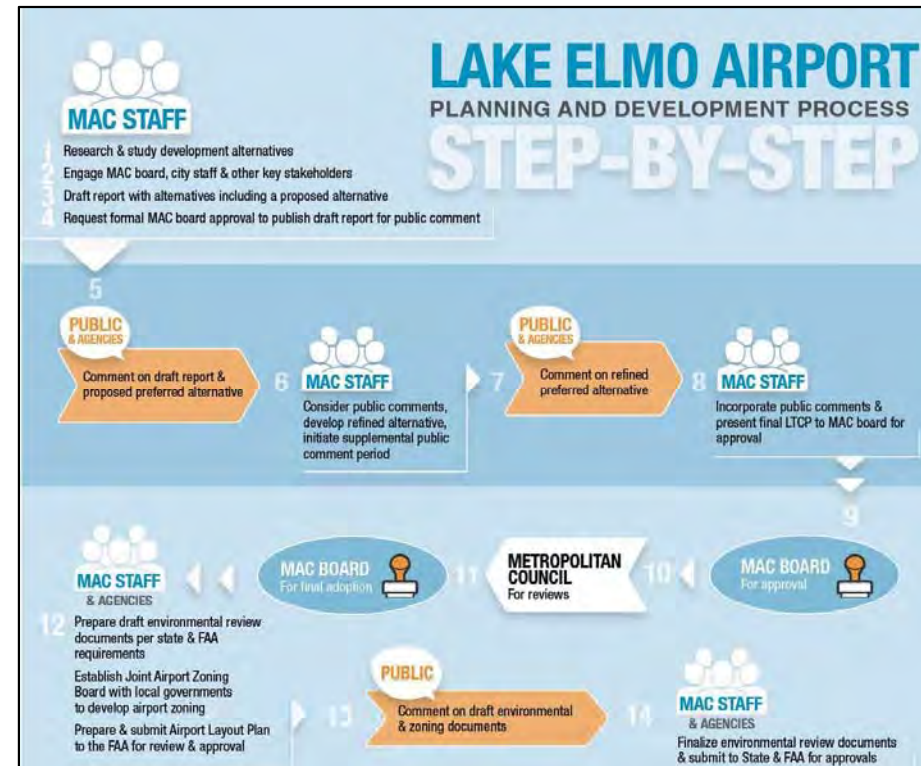
# LTCP: Meeting the Objectives

## Planning Objectives

- Addresses failing end-of-life Infrastructure
- Enhance safety
- Improve operational capacity for design aircraft family

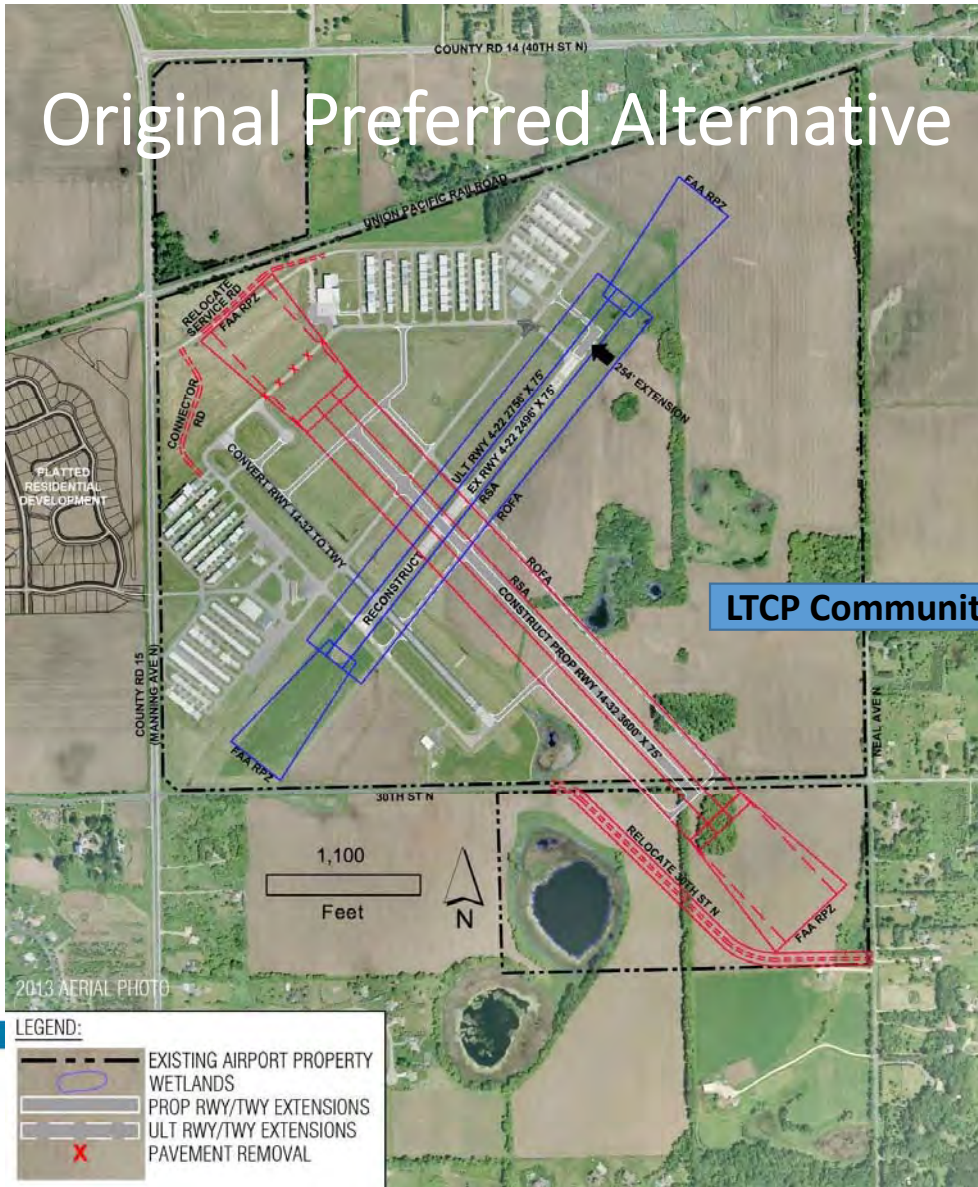
## Addressing the Objectives: Proposed Project

- Relocate Runway 14/32 by shifting 615 feet to the northeast and extending 3,500 feet, including all necessary grading, clearing, and runway lighting.
- Realign 30th Street North around the new Runway 32 Runway Protection Zone (RPZ) and reconnect to the existing intersection with Neal Avenue.
- Construct a new cross-field taxiway to serve the new Runway 14 end, including taxiway lighting and/or reflectors.
- Convert existing Runway 14/32 to a partial parallel taxiway and construct other taxiways as needed to support the relocated runway, including taxiway lighting and/or reflectors.
- Reconstruct Runway 4/22 and extend to 2,750 feet, including necessary lighting and taxiway connectors.
- Establish a new non-precision approach to Runway 14 end and upgrade existing Runway 4 approach to RNAV (GPS).

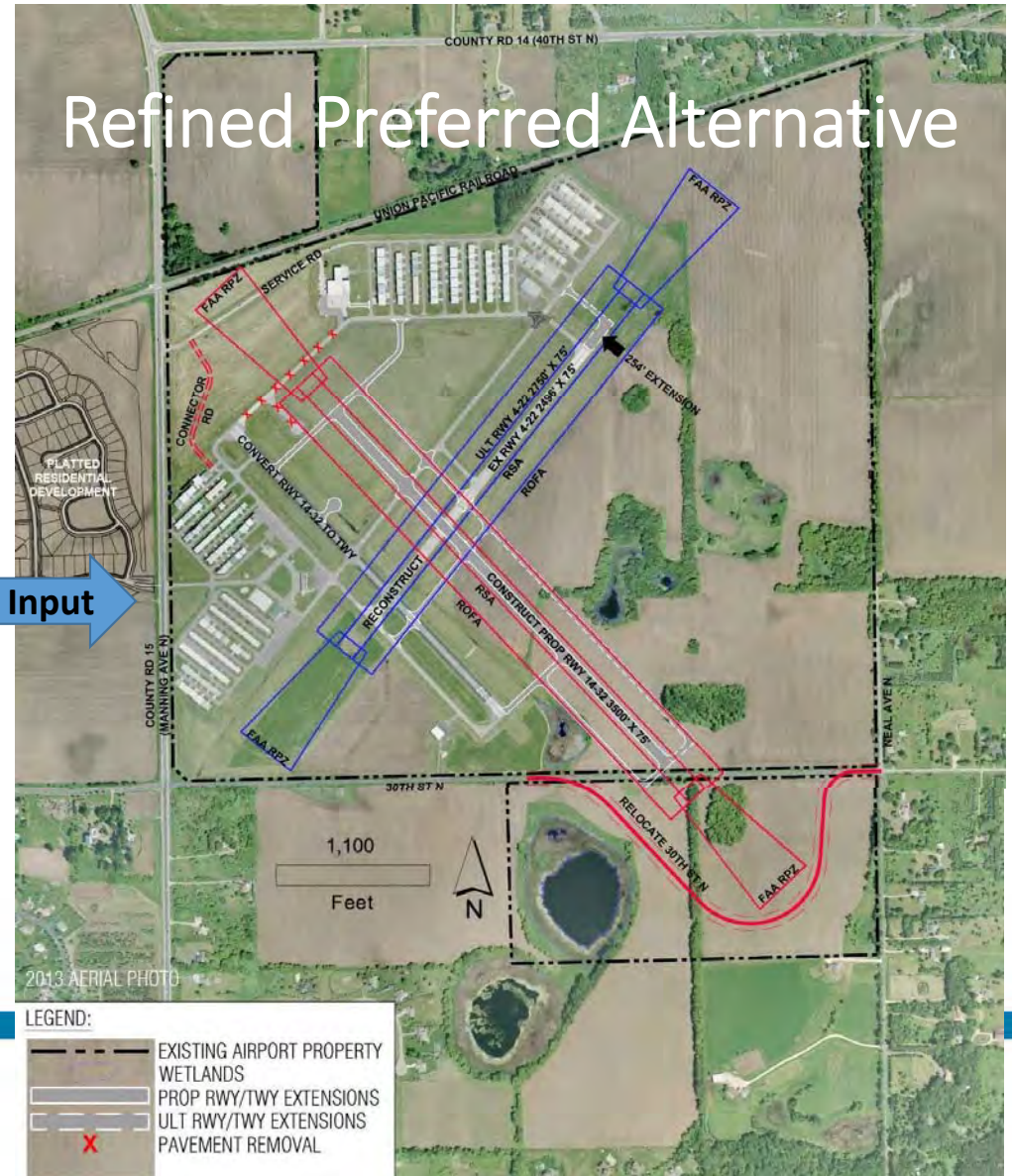




# Original Preferred Alternative

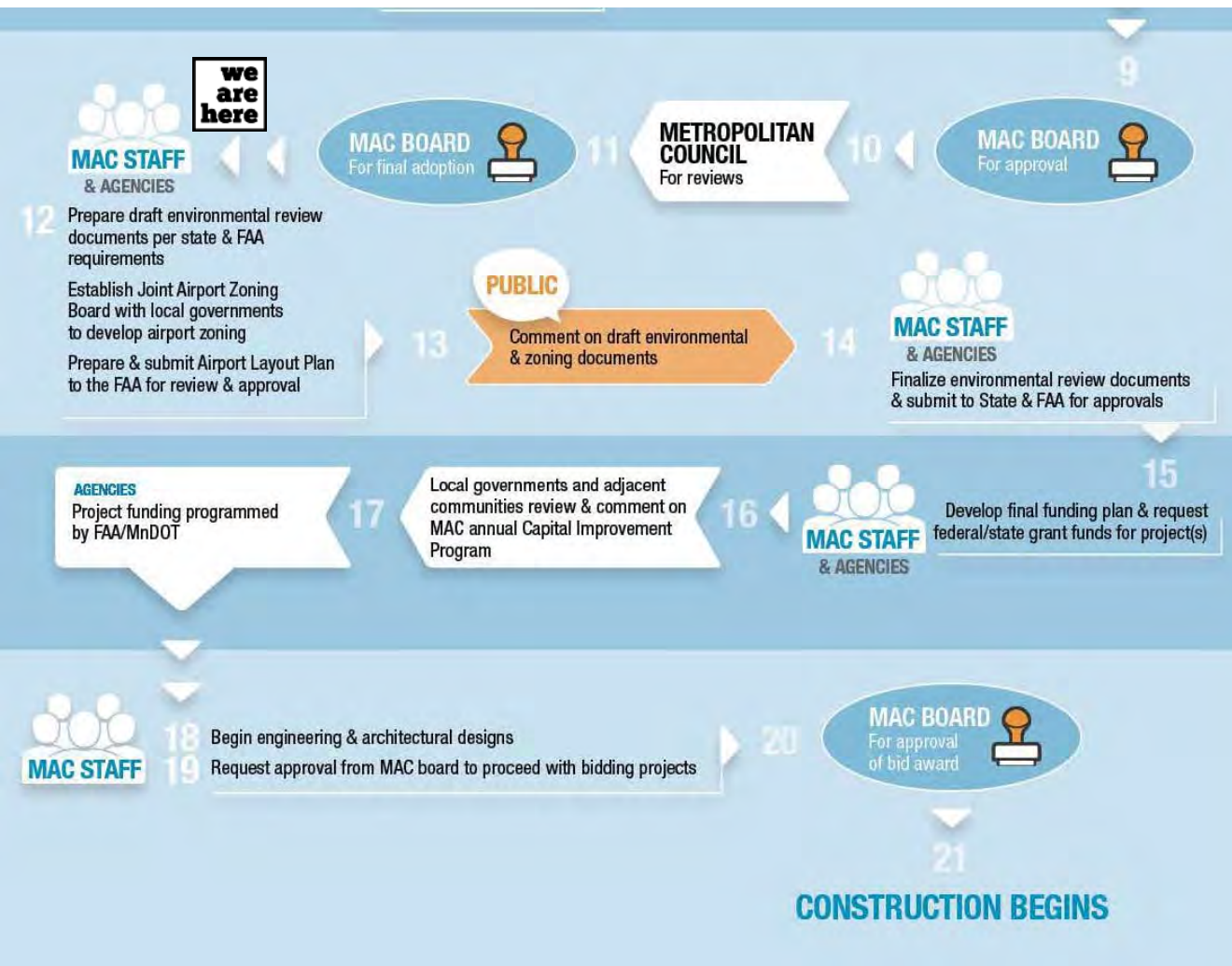


# Refined Preferred Alternative



LTCP Community Input





# Environmental Review

Planning & Development Process  
 Steps 12 through 14



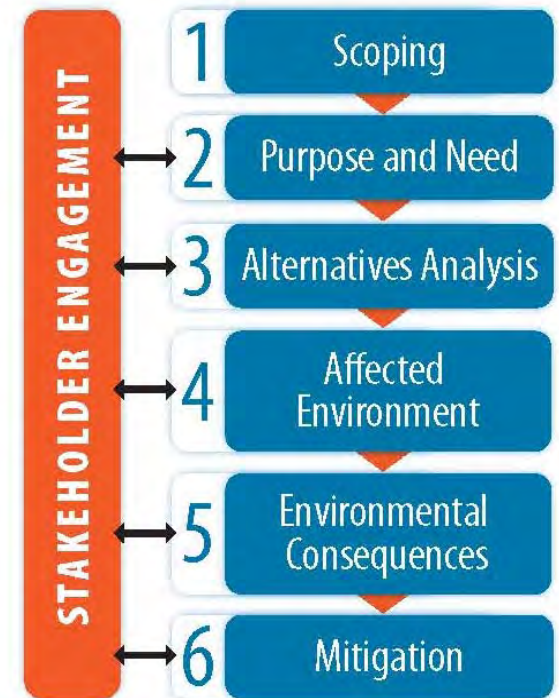
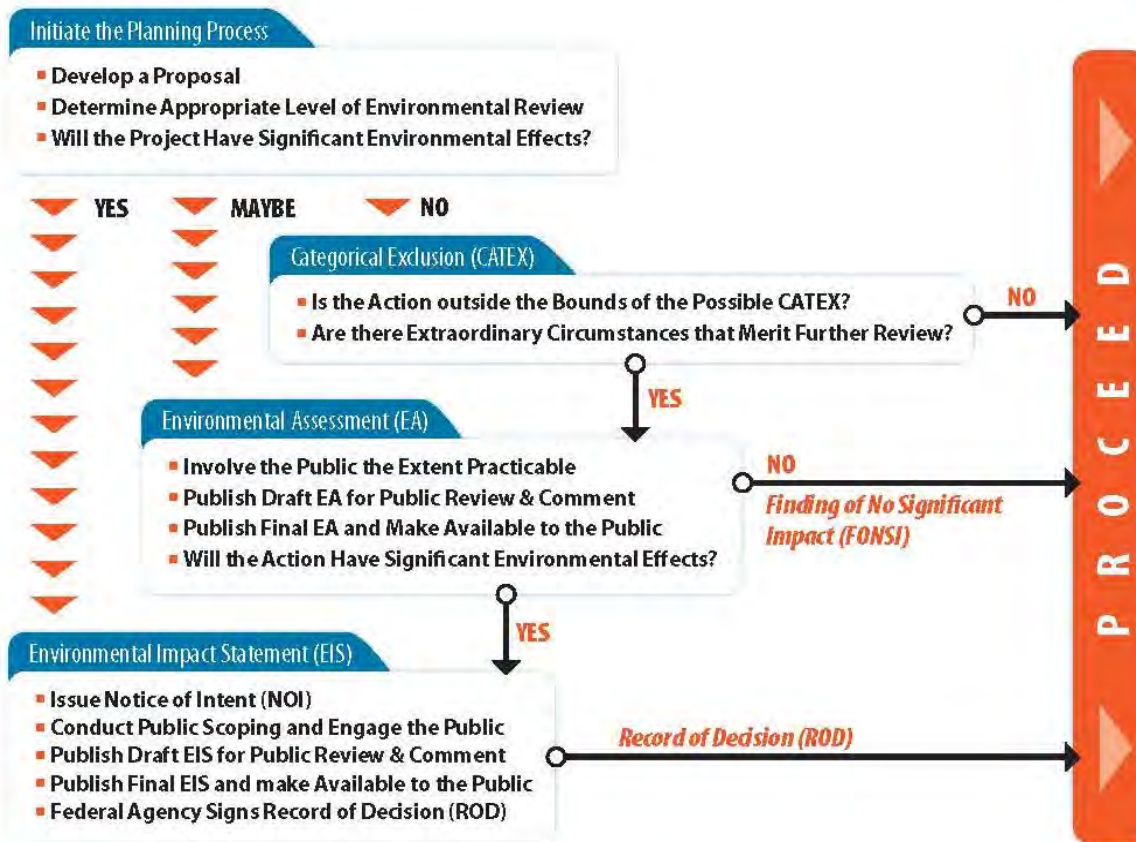


# Environmental Process Overview

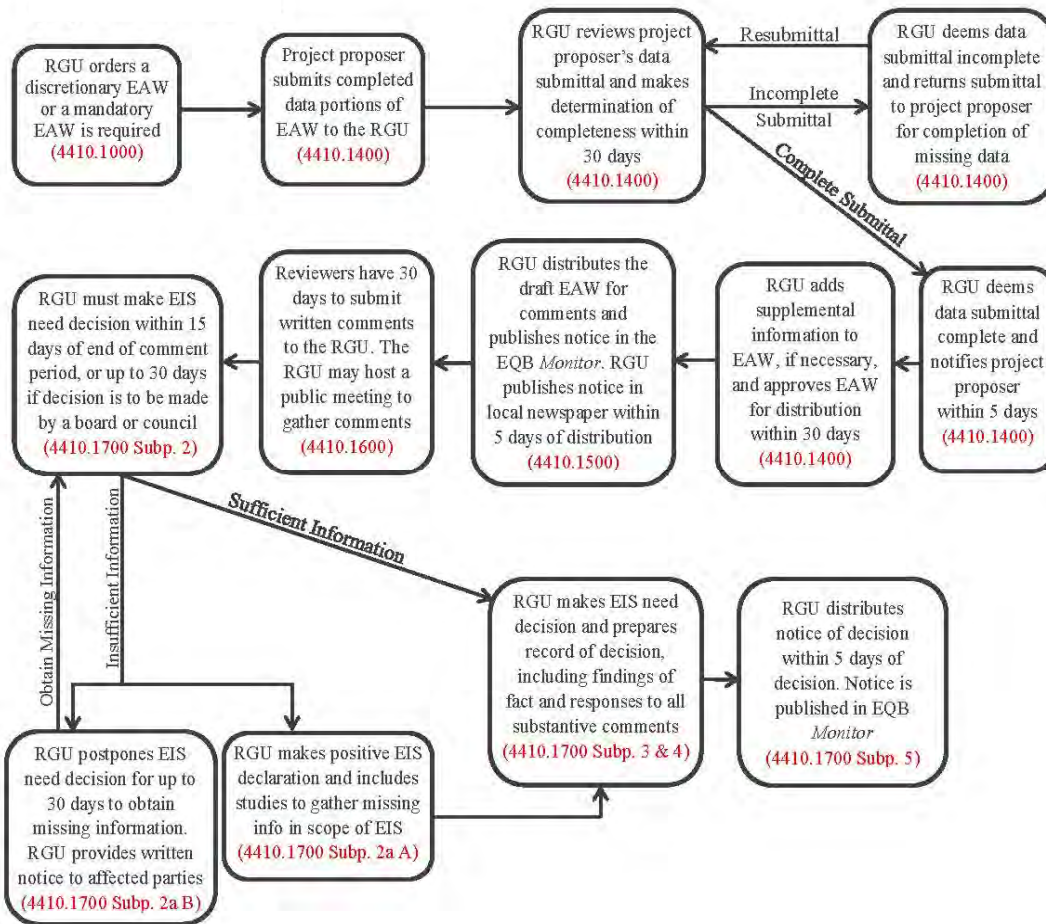
- Federal requirements are identified by the National Environmental Policy Act (NEPA) and associated Federal Aviation Administration (FAA) implementation guidance
- State requirements are identified by the Minnesota Environmental Policy Act (MEPA) and associated Environmental Quality Board (EQB) implementation guidance



# Federal Environmental Process



# State Environmental Process



- New paved runways less than 5,000 feet long require an Environmental Assessment Worksheet (EAW) (see Minnesota Rules 4410.4300)
- Because a Federal EA is being completed, it can fulfill the informational requirements of a State EAW (see MR 4410.1300 and 4410.3900)
- For Lake Elmo Airport, the MAC is both the responsible government unit (RGU) and the project proposer (see MR 4410.0500 and 4410.4300)



# EA/EAW Supplemental Planning Analysis

- Review & Verify LTCP Aircraft Operations Forecasts
- Review & Verify LTCP Runway Length Analysis
- Review & Verify Preferred Alternative



# Purpose and Need

- Purpose and Need Components:
  - Provide the required runway length justification for design aircraft needs.
  - Prevent existing incompatible uses in the Runway 14/32 runway protection zones (RPZs).
  - Replace failing runway and taxiway pavement.
  - Provide adequate runway to taxiway separation.
  - Resolve hangar penetrations to Runway 14/32 transitional surface.
  - Provide adequate and modernized instrument approach capability for users.

*“...comments submitted to the Sponsor during the LTCP process regarding the proposed project will be reviewed and integrated into the alternatives analysis as appropriate to resolve community concerns while providing facilities needed to comply with the project objectives.”*





# Alternatives Analysis

- Compare and evaluate alternatives for meeting the Purpose & Need.
- Alternatives will be developed in sufficient detail to allow an evaluation and comparison in terms of cost, operational and safety factors, and environmental issues.
- Analysis will be completed for all alternatives identified in the LTCP, and rely on information from the LTCP, as well as any refined versions of the preferred alternative developed under the Supplemental Analysis.



# Environmental Analysis and Cumulative Impacts

- Affected Environment
- Environmental Considerations:
  - Air Quality
  - Biological Resources (including fish, wildlife, and plants)
  - Climate
  - Coastal Resources
  - Department of Transportation Act, Section 4(f)
  - Farmlands
  - Hazardous Materials, Solid Waste, and Pollution Prevention
  - Historical, Architectural, Archeological, and Cultural Resources
  - Land Use
  - Natural Resources and Energy Supply
  - Noise and Compatible Land Use
  - Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety
  - Visual Effects (including light emissions)
  - Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
- **Cumulative Impacts** - The NEPA process requires projects that are connected, cumulative and similar (common timing and geography) be considered. The planning window and geographic limit to consider will be determined during preparation of the EA.



# Stakeholder Engagement Plan: Objectives

- The MAC formulated a project-specific stakeholder engagement plan to achieve the following objectives:
  - Strengthen its relationships with stakeholders
  - Foster collaboration
  - Build stakeholder trust and support
  - Proactively identify areas of interest and concern
  - Support and document a thorough and effective process
  - Formalize a system for reaching a wide variety of stakeholders
  - Develop a model for future similar processes
  - Create opportunities for MAC Board members to recognize stakeholder engagement in the EA/EAW process
  - Streamline agency review



# Interested Public and Community Engagement Panel (CEP)



- Interested Public: Members of the public who have an interest in the EA/EAW have a role to play and a responsibility for its outcome.
- Community Engagement Panel (CEP): The CEP is an advisory board representing major community stakeholder groups that is more closely involved in the EA/EAW project than the public at large.

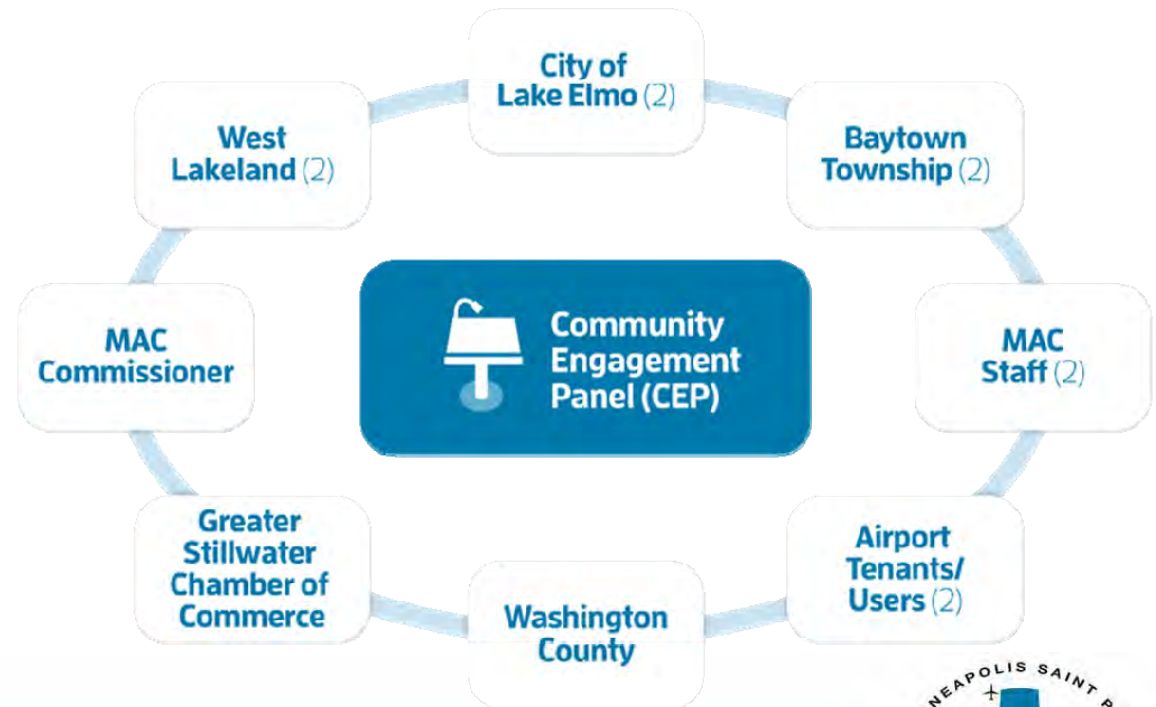


# Community engagement Panel (CEP)

## CEP Role:

Serves several important functions including:

- Representing a broad range of stakeholder groups in the EA;
- Receiving information about the EA/EAW and sharing it with constituencies;
- Providing input to the EA/EAW as the voice of key stakeholders; and
- Providing technical advice to the M&H Team.





# Messaging



## Messaging Strategies:

- Use of plain language – minimizing the use of acronyms and technical jargon that would likely be unfamiliar to a public audience
- Providing definitions of unfamiliar or technical terms when used in project messages
- Providing explanations of aviation terms and regulations and airport operations that are relevant to project messages
- Using easy-to-understand graphics, tables and charts in addition to narrative descriptions
- Reviewing public comments received in response to public messaging and providing additional explanation or clarification when needed through follow up outreach.



# Outreach Platforms

- In-Person Presentations
- Special presentations for elected officials
- Project Newsletters
- Project Website
- GovDelivery
- Press Releases



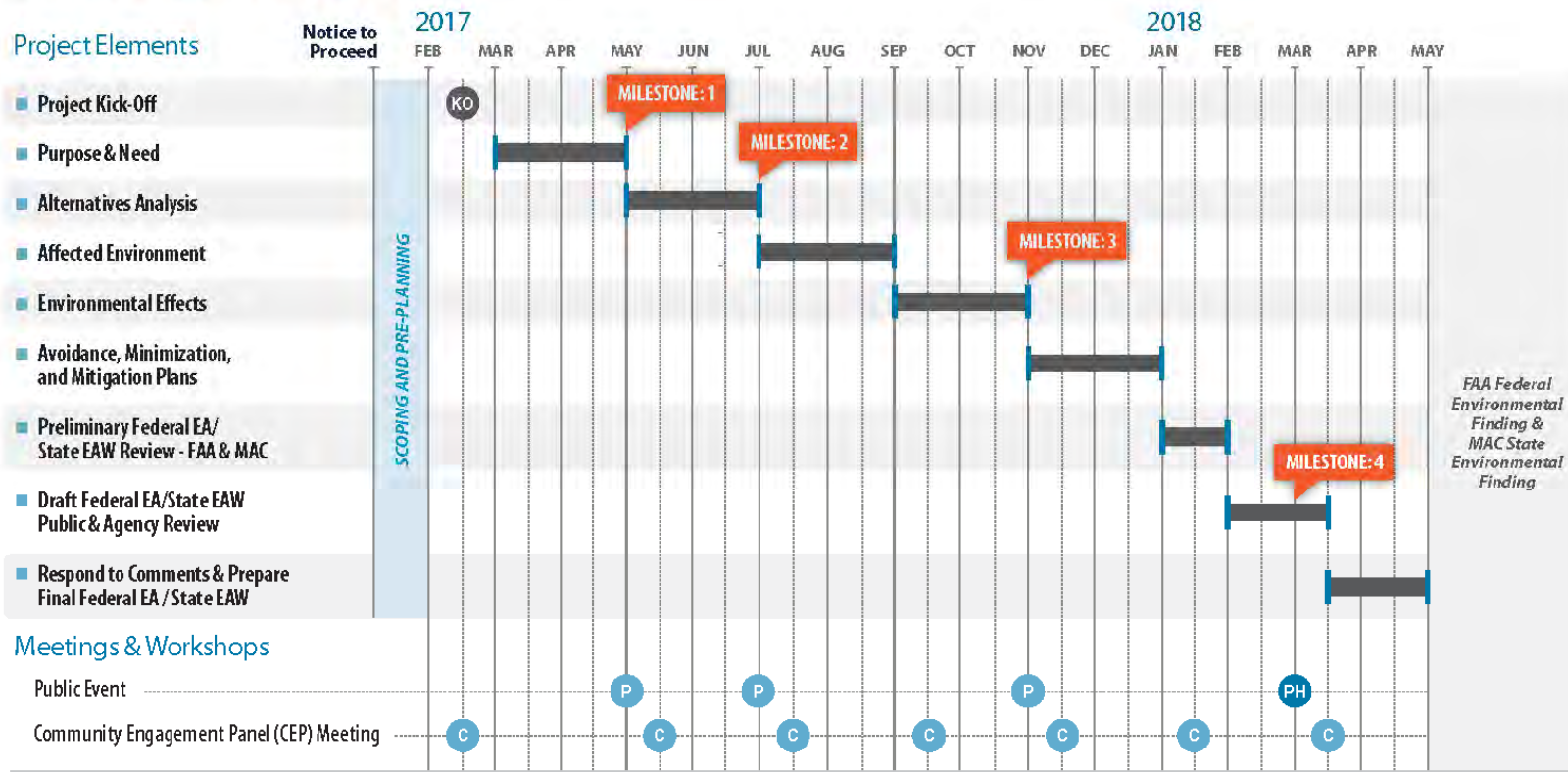
# Stakeholder Engagement Plan: Public Events & Outreach Platforms



- Public events will be held at four key project milestones:
  - Introduction to the NEPA process
  - Purpose & Need and Alternatives
  - Environmental Effects
  - Draft EA Public Hearing
- Project messaging platforms include the following:
  - Project webpage
  - Monthly project updates and periodic newsletters
  - GovDelivery email subscriber list
  - Press releases



# EA Project Timeline



## Environmental Assessment Lake Elmo Airport



# CEP Guidelines

- Acknowledge and respect the opinions and interests of all CEP members at all times
- No formal meeting or voting procedures will be established
- CEP is advisory; MAC retains decision-making authority
- CEP members are encouraged to disseminate project information to their constituent groups and the general public
- CEP members are discouraged from misrepresenting meeting proceedings to their constituent groups, the general public, or the media
- Observers may attend CEP meetings but are asked to refrain from interrupting the proceedings
- Future meetings will be scheduled at least one month in advance and every effort will be made to identify dates and times that work for all CEP members
- MAC's consultant will take meeting notes for the record, which will be made available on the project website





# Discussion/Questions

- CEP Meeting #2 planned for two weeks after first public event (tentatively May 2017)
- Topics for the next meeting will include:
  - A recap of the first public event
  - Initial work on Purpose & Need and Alternatives





# Lake Elmo Airport Federal EA / State EAW Community Engagement Panel Meeting #2

May 25, 2017  
6:00 P.M.



## Agenda

1. Recap – CEP Participants, Role & Guidelines
2. Debrief – May 11<sup>th</sup> Public Event
3. Recap – Environmental Process
4. Purpose & Need
  - a. FAA Guidance
  - b. Project Goals & Objectives
5. Range of Alternatives Considered
  - a. FAA Guidance
  - b. Range of Alternatives Considered
    - i. No-Action Alternative
    - ii. Primary Runway 14/32 Alternatives
    - iii. 30<sup>th</sup> Street North Realignment Alternatives
    - iv. Crosswind Runway 04/22 Alternatives
    - v. Approach Upgrade Alternatives
  - c. Alternatives to be Carried Forward into the EA
  - d. Alternatives Evaluation Criteria
6. Discussion/Questions



**LAKE ELMO AIRPORT FEDERAL EA / STATE EAW**

# Community Engagement Panel

## Meeting #2 Minutes

Lake Elmo Public Library  
May 25, 2017  
6:00 P.M.

**Panel Attendees**

John Renwick  
Marlon Gunderson  
Keith Bergmann  
Stephen Wensman  
Mary Vierling  
Dave Schultz  
Stephen Buckingham  
Ann Pung-Terwedo  
Chad Leque  
Neil Ralston  
Michael Madigan

**Other Attendees**

Dana Nelson  
Joe Harris  
Patrick Hogan  
Melissa Scovronski  
Brad Juffer  
Gary Schmidt  
Evan Barrett  
Colleen Bosold

**Public Observers**

Jonathan Schmelz  
Jim Aronson  
Jennifer Foreman  
Ellie B.  
Mary Ritt  
Jack Ritt

**Representing**

Airport Tenant/User  
Airport Tenant/User and City of Lake Elmo Resident  
City of Lake Elmo Resident  
City of Lake Elmo Planning Director  
West Lakeland Township Resident  
West Lakeland Township Supervisor  
Baytown Township Resident  
Washington County Public Works Planner  
Metropolitan Airports Commission Director of Environment  
Metropolitan Airports Commission Airport Planner  
MAC Commissioner District F

**Representing**

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Mead & Hunt  
Mead & Hunt

**Representing**

Lake Elmo  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township  
Baytown Township  
Baytown Township

# Meeting Minutes

## **Absent Panel Members**

Robin Anthony  
Kent Grandlienard

## **Representing**

Greater Stillwater Chamber of Commerce  
Baytown Township Supervisor

*The attached report represents this writer's interpretation of items discussed during the meeting. Any corrections or additional information should be brought to our attention for clarification.*

## **The purpose of the meeting was to:**

- Conduct a debrief of the May 11<sup>th</sup> public event and get the Community Engagement Panel's (CEP's) feedback on what went well and what could be improved for future public events.
- Introduce the Purpose & Need and Alternatives portions of the environmental process, and get feedback from the CEP on the material presented.
- Continue to equip CEP members to be the point of contact for information sharing, both to and from the community and MAC, and to respond to inquiries from their constituent groups.

## **Items discussed and Q&A were as follows:**

Dana Nelson started off the meeting with a recap of the CEP's role, participants and guidelines. She then shared statistics on the May 11<sup>th</sup> public event, including number of attendees and written comments as well as a breakdown of the types of comments received, breakdown of attendees by city/township, and common themes of the questions and comments. At that point, she asked the CEP if there were common question/comment themes the group thought were missing from the list based on what they heard and discussions they had at the public event.

John Renwick said he talked to a woman at the public event who was concerned about emergency response times and asked if it made sense to have emergency responders attend a future CEP meeting. Dave Schultz reported there are no fire hydrants in Baytown Township, and that fire trucks have to haul in water from the nearest fire hydrant, which was reported to be a quarter mile west of Manning Avenue in Lake Elmo, meaning they will have to go around the proposed curve shown for some of the 30<sup>th</sup> Street North realignment alternatives to obtain water. There was some discussion of whether the planned realignment of Stillwater Boulevard would result in hydrants closer to the area in question.

Dana Nelson then asked for feedback and a discussion on the following three items relating to the public meeting:

- What are your thoughts on advanced notification for the meeting, venue/room set-up, and information presented at the meeting?
- Are there opportunities for improvement?
- How do we make it easier for each person to get their question/comment heard during the meeting?

Keith Bergmann said he didn't know how to get people to ask the real questions that were concerning them, like where does the MAC get the funding for capital improvements. He reported that after the public meeting, in talking to several people, it seemed their biggest concern was the 30<sup>th</sup> Street North



## Meeting Minutes

realignment, but nobody brought that up during the Q&A portion of the public event. He expressed concern that people didn't voice their honest concerns at the public event.

Stephen Buckingham noted that some of the people were fearful of increased jet traffic and noise and their voices in the discussion were louder than the rest.

Mary Vierling suggested there were so many issues that came up, that people lost focus on their main problem or question.

Keith Bergmann proposed taking the topics of concern and addressing them at the next public meeting.

John Renwick said he thought the one-on-one discussions before and after the formal presentation and Q&A session were the most valuable part of the meeting.

Dana Nelson asked if we should consider lengthening the time at the informational boards for the next public event (but not the length of the overall event). She stated that approximately 55 of the 60 members of the public in attendance signed up to receive the e-news updates for the project.

Dana then explained that the project team will be expanding the FAQs on the project website to respond to the common questions and comments heard during the public event, and provided a list of those new FAQs to be developed (see presentation "Next Steps" slide for list of questions). The group agreed that the list of questions presented were representative of the scope of questions/concerns that were raised by the public.

Dana then turned the meeting over to Evan Barrett, the project manager from Mead & Hunt, which is the consultant in the environmental review process. Evan began the presentation with a recap of the environmental process. He stated that the last time the CEP met, in February, the project was in the scoping phase. He reported we are now in phases 2 and 3, the Purpose & Need and Alternatives Analysis portions of the environmental process. He also went over the project schedule.

Evan then explained what the Purpose & Need are according to FAA guidance, and defined what they are specifically for this project at Lake Elmo Airport. He then went into detail on the four Purpose & Need objectives for Lake Elmo Airport.

While discussing Purpose & Need Objective 2 (minimize incompatible land uses in the RPZs), Neil Ralston added that another objective in relocating Runway 14/32 is to maintain a clear RPZ relative to Washington County's proposed widening of Manning Avenue from two to four lanes in the next five years. He explained that a roadway expansion would require FAA approval if it were to occur within the RPZ and is, therefore one of the driving factors for relocating the runway.

While discussing Purpose & Need Objective 3 and talking about "useful loads," a citizen observing the CEP meeting asked Evan to clarify what he meant by "load" and asked if that meant bigger jets/planes. Evan answered that a useful load refers to passengers, cargo, and fuel carried aboard an aircraft, and that jet aircraft requirements were not considered as part of the Purpose & Need for the project. Chad Leve explained that the useful load numbers represent how effective/useable the current runway length can be given each individual aircraft's takeoff and landing performance requirements. Chad then talked about the MAC system of airports and how Lake Elmo Airport is an important part of the system for accommodating smaller aircraft.

## Meeting Minutes

Evan Barrett then discussed the FAA guidance for the range of alternatives that should be considered, followed by what this means specifically for Lake Elmo Airport in terms of the criteria used to identify reasonable alternatives and the five categories of concepts that will be considered.

Stephen Buckingham asked how many turboprop aircraft are currently based at the airport, and noted they are essentially a jet engine with a propeller. He also asked where they get fuel. Joe Harris and Neil Ralston answered there is one based at the airport, and Neil said it obtains fuel at either Anoka County or St. Paul Downtown airports.

Mary Vierling asked how many helicopters are based at Lake Elmo Airport. Joe Harris said there were two helicopters based at the Airport. A citizen observing the CEP meeting said there are several aircraft that fly low over Lake McDonald and expressed frustration about it.

John Renwick explained to the group that in addition to being on the CEP and a pilot at the airport, he wears several other hats. He's the Lake Elmo Airport volunteer for the Aircraft Owners and Pilots Association (AOPA) as well as a representative on the MAC Reliever Airports Advisory Council, which meets with the MAC Commissioners to discuss issues and concerns. He offered that he is happy to listen to the concerns of others in the community – not just the tenants – and to see if he can work with the airport tenants to resolve any issues at that level. John also noted that he's asked the MAC to provide on-airport signage on the airport's noise abatement policy and procedures.

Dave Schultz expressed frustration about citizen reports regarding aircraft operating loudly and early in the morning. He also noted the airport seems busier than ever in the last few months. He said there's a twin-engine plane that has flown very low – just above his treetops – and he has called Dana Nelson to report the issue.

A citizen observing the CEP meeting said pilots should adjust the pitch of the propeller to reduce noise.

Keith Bergmann asked why it was important to maintain the existing runway orientations. Evan Barrett answered that the airfield is currently laid out in a way that was most compatible with other airport infrastructure, and it would be more cost-effective to maintain those orientations. He also noted that maintaining the orientations would prevent significant changes to existing aircraft flight patterns near the airport. Neil Ralston also mentioned that the orientations provide optimal wind coverage. John Renwick suggested that the real goal in this respect is to try and use the land the MAC has most effectively. Evan and Neil confirmed that.

Evan Barrett then presented the No-Action Alternative and the five Primary Runway 14/32 Alternatives.

A citizen observing the CEP meeting then asked why it was necessary to have the airport here if there's an airport in New Richmond that serves bigger aircraft and questioned the sincerity of the MAC's public outreach efforts. Marlon Gunderson stated that these improvements have been in a master plan since the 1960s. Chad Leqve responded that the MAC is doing its best to find an optimal solution to the needed improvements at Lake Elmo Airport to make the airfield safer. He noted that if you look at the record of discussions on this project, one would see that MAC began with a plan for a 3,900-foot primary runway. When studying it in the recent Long-Term Comprehensive Planning (LTCP) process, the proposed length was reduced to 3,600 feet. After receiving public input as part of the LTCP, the proposed length was further reduced to 3,500 feet. The EA is now looking at an option with a displaced threshold to further consider input from the public. He stated it would be hard to argue that the MAC's efforts are insincere. However, he acknowledged that it's unlikely that everyone involved is going to be completely happy at the end of this process.

## Meeting Minutes

A citizen observing the CEP meeting voiced concerns about property values decreasing as a result of the airport improvements as he suspects larger aircraft will start using the airport.

John Renwick stated that he doesn't see that the runway improvements would change the character of the airport and the aircraft that use it.

Evan Barrett then presented the 30<sup>th</sup> Street North Realignment Alternatives.

Stephen Buckingham expressed safety concerns over the "hairpin curve" on 30<sup>th</sup> Street North and emergency vehicle response times.

Dave Schultz expressed frustration over the idea of another cul-de-sac in West Lakeland Township as he stated they are difficult to maintain and plow. A citizen observing the CEP meeting added that large trucks are difficult to maneuver around a cul-de-sac. Several people stated they did not like cul-de-sacs or roundabouts, and noted that the postmaster doesn't like cul-de-sacs, either.

Chad Leque asked the CEP members if they had a preference on roundabouts versus T-intersections. The general reaction was that it's a toss-up, and both are bad options. Dave Schultz, Mary Vierling and several citizens observing the CEP meeting expressed that they didn't like either option.

There was discussion and concern over the proposed curve in the road. Neil Ralston pointed out that 30<sup>th</sup> Street North already has curves in it at other points in the road.

Mary Vierling pointed out that there's a grade difference and asked if the grades had been considered in the 30<sup>th</sup> Street North realignment alternatives. A citizen observing the CEP meeting stated that he believed the elevation change is 24 feet. Neil Ralston confirmed there is a grade difference, and asked Evan Barrett to be sure the project team looks at that when analyzing the alternatives.

Chad Leque pointed out that the Mead & Hunt team, in developing the alternatives presented tonight, has been looking at the LTCP comments, travel times, and the safety of the roadway design and curves. He expressed concern that the primary issues and concerns identified in the LTCP process were now changing and he asked if MAC and Mead & Hunt were on the right path or trying to hit a moving target. When asked what the true issues and concerns are regarding the 30<sup>th</sup> Street North realignment, the group's consensus was travel time and safety of the roadway design. Chad again reiterated that MAC and Mead & Hunt may not be able to make everyone completely happy, but is doing its best to address the public's primary concerns. Dave Schultz confirmed that yes, we are on the right path, and said that of the three alternatives that were being carried forward (3, 4A and 4B), he would prefer 3 over 4A or 4B.

Neil Ralston asked if there was a benefit to continuous traffic (no stop sign) on 30<sup>th</sup> Street North as proposed by Alternatives 4A and 4B. Several members of the CEP and citizen observers answered no – that they prefer a stop because they see a stop as being safer.

Marlon Gunderson suggested the idea of Alternative 4B modified to include a through road on Neal Avenue instead of a cul-de-sac. Evan said that the project team would look into this possibility.

A citizen observing the CEP meeting asked about the FAA's RPZ versus MnDOT's Clear Zone. Evan Barrett answered that the MnDOT Clear Zone is larger for this particular runway, and that Alternatives 4A and 4B propose "clipping" the outer corners of the MnDOT Clear Zone. Neil Ralston added that MnDOT wants the airport to own the property in the clear zone, which the MAC does in the case of Lake Elmo

## Meeting Minutes

Airport. The observer then questioned whether the RPZ and Clear Zone were hard rules or only guidelines. Neil responded that the FAA has a hard stance regarding roads in the RPZ.

Evan Barrett then presented the Crosswind Runway 04/22 & Instrument Approach Alternatives. In both cases, the supplemental planning analysis did not identify any additional alternatives for these categories, so the preferred alternative from the LTCP would be carried forward for each of these. Evan then recapped the alternatives to be carried forward into the Environmental Assessment, and gave a brief overview of the alternatives evaluation criteria that would be used to determine a preferred alternative for Runway 14/32 and the 30<sup>th</sup> Street North realignment.

The meeting was then opened to the CEP for general discussion and questions.

A citizen observing the CEP meeting asked if a date had been set yet for the next public event. Evan Barrett answered no, not yet, and stated the meeting will be publicized on the project website and through public notices in the local papers at least three weeks prior to the event.

Dave Schultz asked if he heard correctly, that by the next public event, the project team would have the runway and roadway alternatives whittled down to one with which to move forward? Evan Barrett answered, yes, we would have a preferred alternative for each of those by the next public event, and would be presenting those at that event.

Marlon Gunderson shared his perspective as a pilot, saying that in regards to the proposed runway length, “we’re talking about the difference between a ridiculously short runway versus just a short runway.” He noted the noise impacts on the runway end will be moved south a little bit due to the shift in the traffic pattern.

Keith Bergmann noted that it’s clear the MAC is attempting to mitigate and accommodate noise concerns with the displaced threshold option.

John Renwick explained to the group what a displaced threshold is and noted it seemed like a good idea to him.

Dave Schultz asked Marlon Gunderson what kind of airplane he flies. Marlon answered a ¾-scale Piper Cub and another self-built aircraft. He stated he can only fly this airplane by himself out of this airport.

Dave Schultz stated that the runway flight path is over agricultural land now, but when the runway is shifted, it will be over homes. He then pointed out where there’s a home in the flight path.

Mary Vierling commented that Neal Avenue is a narrower road than 30<sup>th</sup> Street North.

Dave Schultz noted that the township had recently had a traffic study done on Neal Avenue and 30<sup>th</sup> Street North, and found that there were over 1,500 cars a day on 30<sup>th</sup> Street North and over 100 cars per hour at rush hour.

Evan Barrett concluded the meeting by thanking everyone for their time and input, encouraged attendance at the next public event, and said there would be further discussion on alternatives at the public event and next CEP meeting.

The meeting adjourned at approximately 8:00 p.m.





# Lake Elmo Airport

## Environmental Assessment (EA)/ Environmental Assessment (EAW) Worksheet



May 25, 2017 – Community Engagement Panel Meeting #2  
Public Event Debrief and Introduction to Purpose & Need/Alternatives



# Agenda

- Recap – CEP Participants, Role, & Guidelines
- Debrief – May 11<sup>th</sup> Public Event
- Recap – Environmental Process
- Purpose & Need
- Range of Alternatives to be Considered
- Discussion

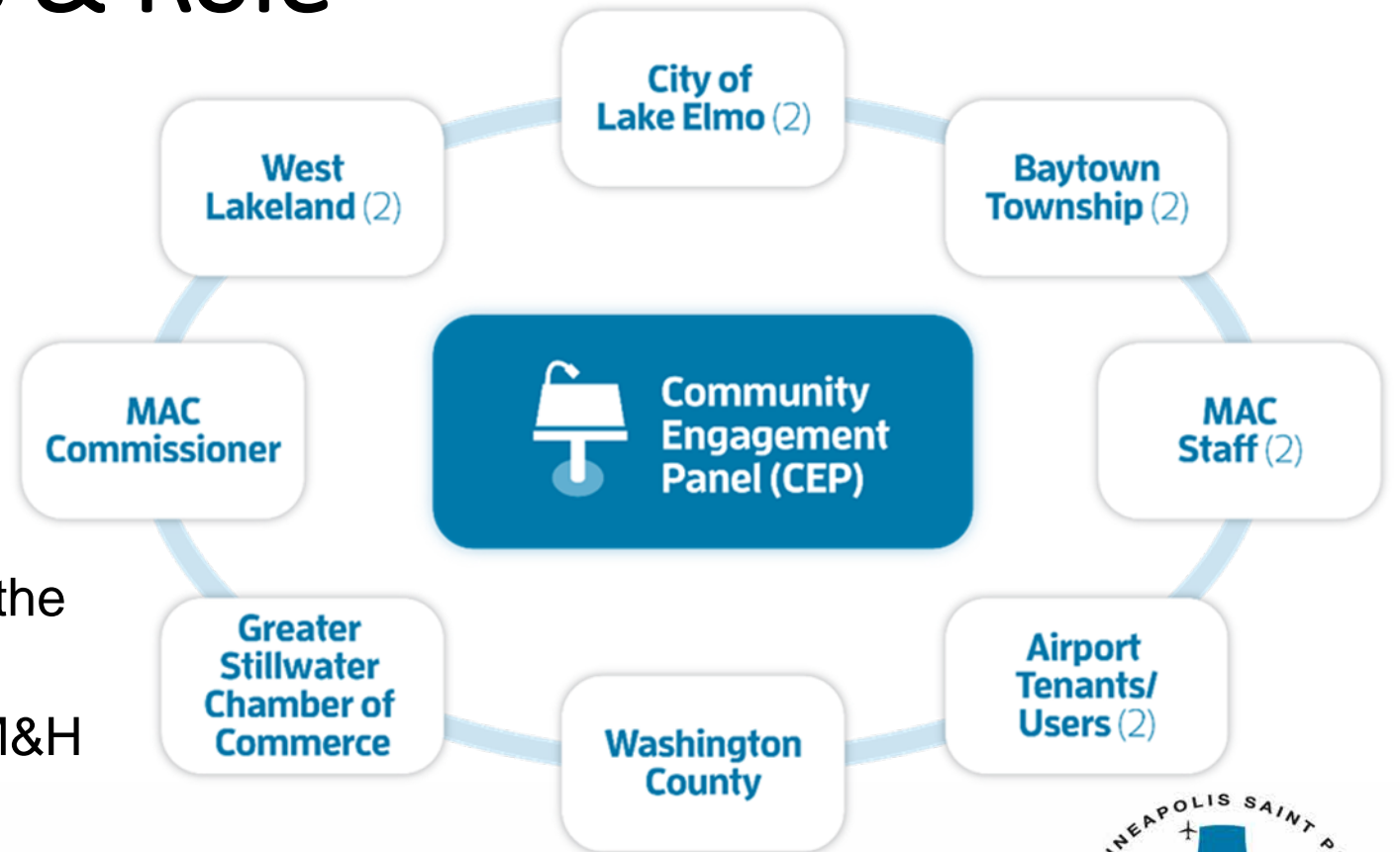


# Community Engagement Panel (CEP)

## Recap: Participants & Role

Serves several important functions including:

- Representing a broad range of stakeholder groups in the EA;
- Receiving information about the EA/EAW and sharing it with constituencies;
- Providing input to the EA/EAW as the voice of key stakeholders; and
- Providing technical advice to the M&H Team.



# Recap: CEP Guidelines

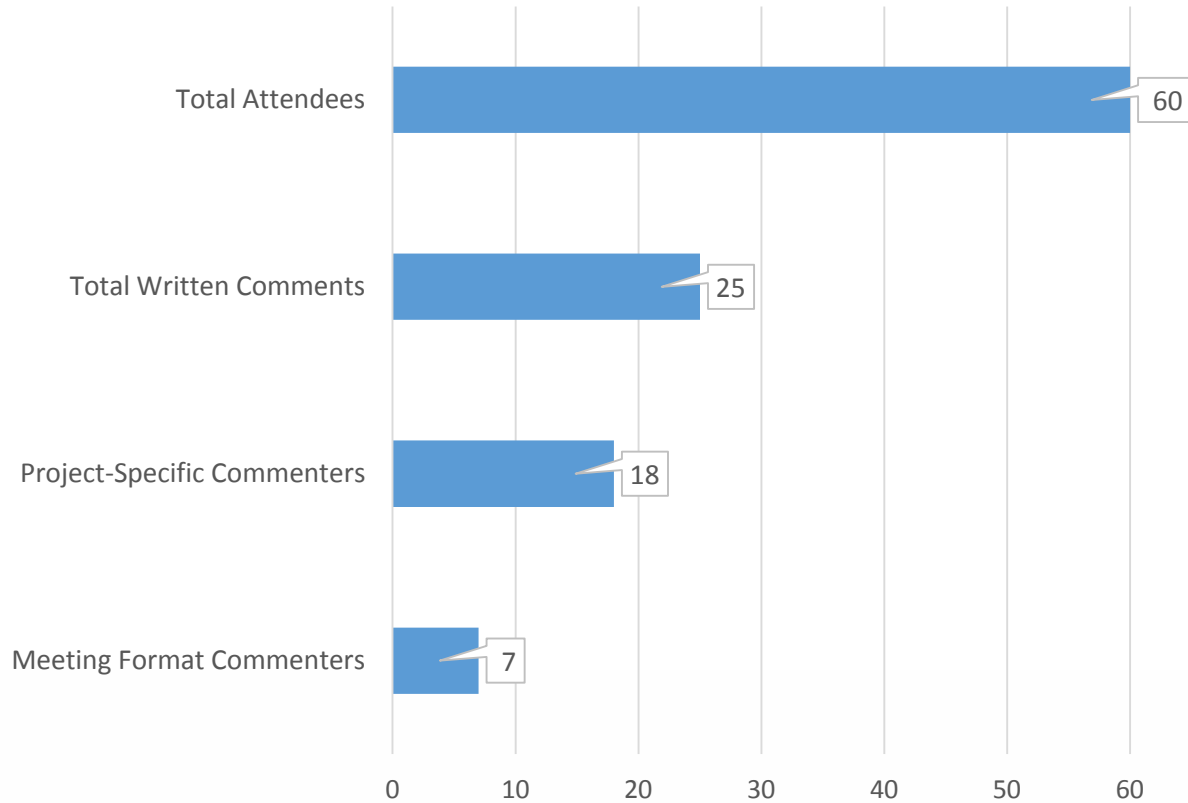


- Acknowledge and respect the opinions and interests of all CEP members at all times
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- Observers may attend CEP meetings but are asked to refrain from interrupting the proceedings
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- MAC's consultant will take meeting notes for the record, which will be made available on the project website

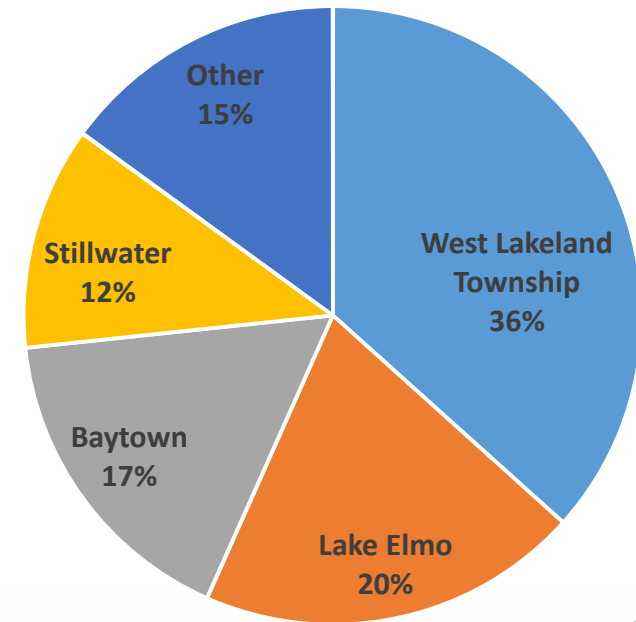


# May 11<sup>th</sup> Public Event #1

## Overall Meeting Summary

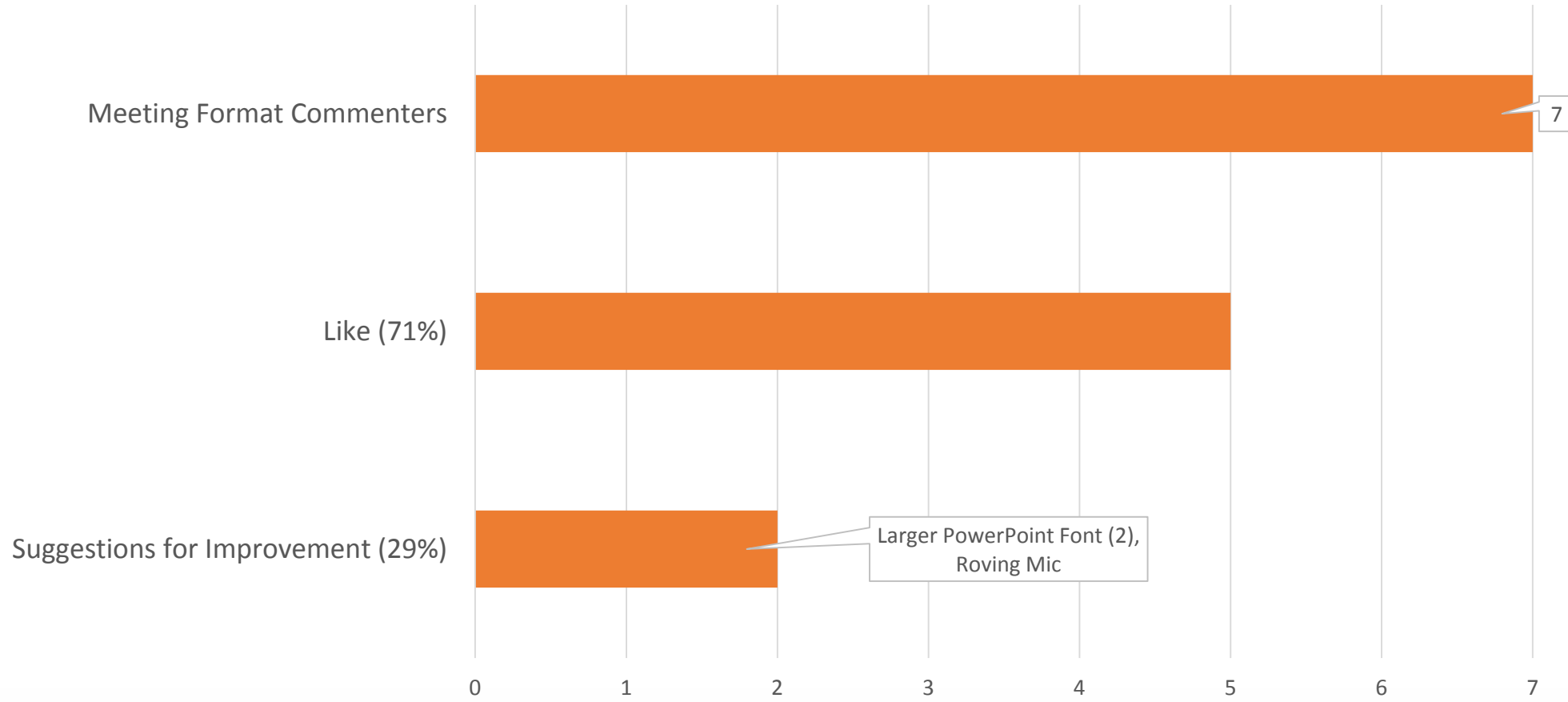


### Attendees by City/Township

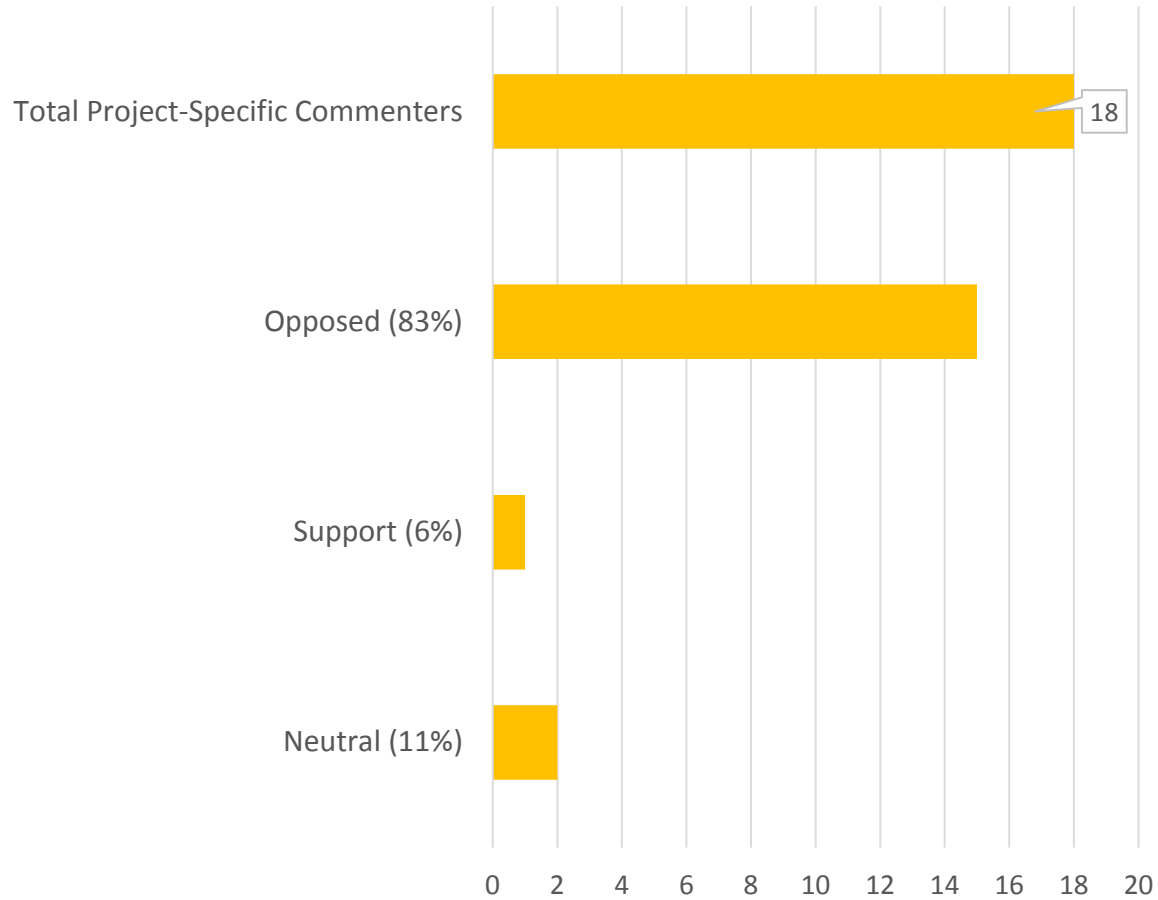




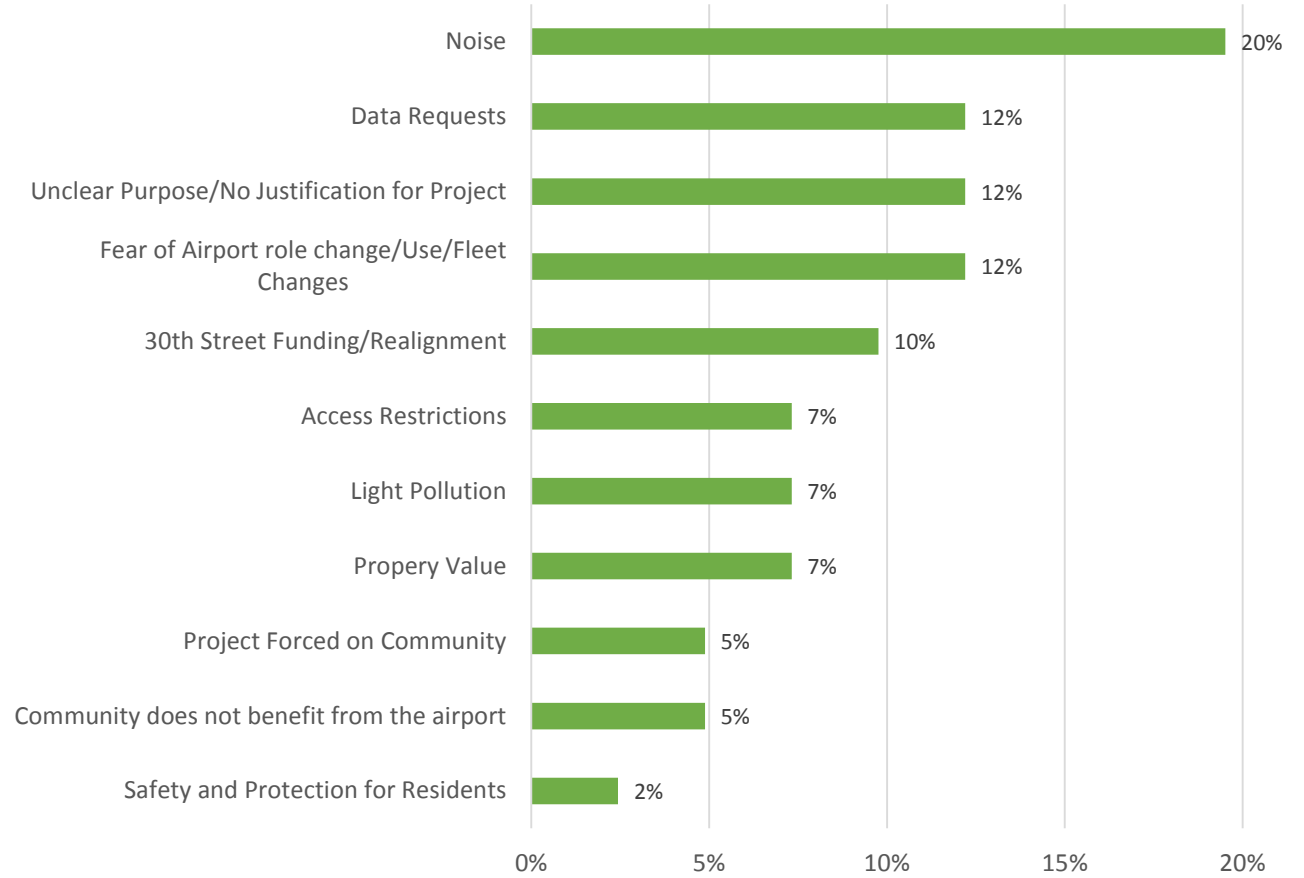
# Meeting Format Comments



## Project-Specific Comments



## Opposition Comment Themes



# Questions/Comment Themes

- Jet operations
- Business operations
- Aircraft noise
- Close the airport
- Property values
- Project costs versus benefits
- 30<sup>th</sup> Street Realignment/who's going to maintain
- Taxes MAC pays to the city/county and use of general tax dollars
- MAC/pilots/users don't care about impacts to the community
- TCE groundwater pollution
- Concern that this project is meant to attract more, bigger aircraft – that this is to grow the airport



# Discussion and Feedback

- What are your thoughts on advanced notification for the meeting, venue/room set-up, and information presented at the meeting?
- Are there opportunities for improvement?
- How do we make it easier for each person to get their question/comment heard during the meeting?



# Next Steps

- We will be expanding FAQs on the website to respond to the common questions and comments heard throughout the meeting:
  - How will noise be evaluated in the EA?
  - Why do aircraft need to run their engines up?
  - Why do aircraft repeatedly fly over the same areas?
  - What will be done to mitigate aircraft noise?
  - Is the airport able to restrict certain kinds of aircraft or operations to certain times?
  - What is the current make-up of the aircraft at the Airport today? How is it expected to change?
  - What are the impacts to my property value?
  - What are the project costs and funding sources?
  - How will my property taxes be impacted?
  - Who will pay for the reconstruction of 30<sup>th</sup> Street?
  - Who will be responsible for maintaining 30<sup>th</sup> Street?
  - How is the airfield lighting going to change?
  - Why can't the runway be rehabilitated without extending?

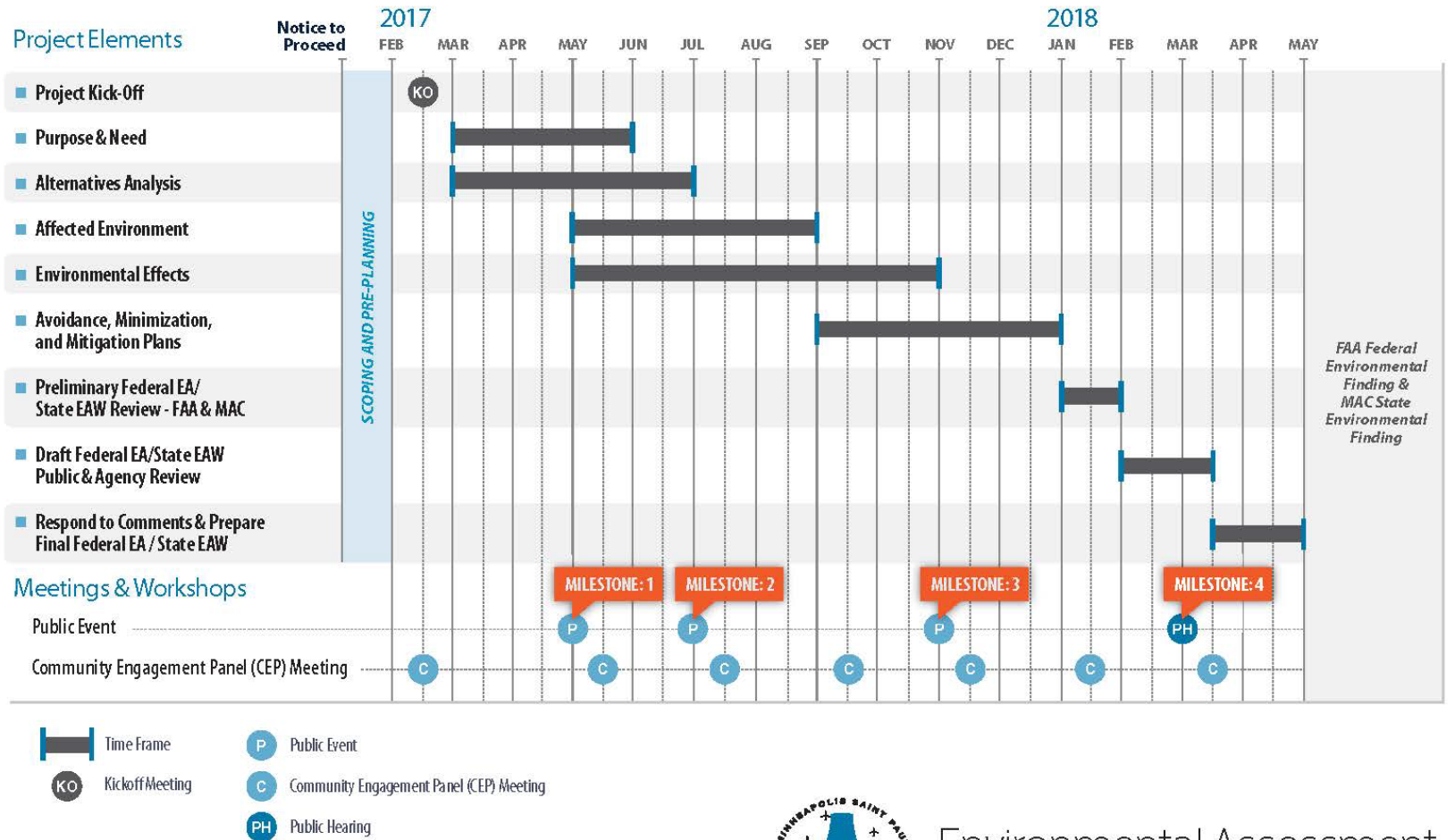




# Environmental Process Recap



## EA Project Timeline



Environmental Assessment  
Lake Elmo Airport

# Purpose and Need

## FAA Guidance

- Explains why a project is being proposed.
- A defensible Purpose and Need statement should be:
  - Clearly written
  - Concise (incorporating any detailed supporting data by reference)
  - Understandable to those unfamiliar with aviation
- The **Purpose** is a general statement of over-arching project goals.
- The **Need** is a more detailed statement describing:
  - Problems to be solved by the project, and
  - Specific objectives for resolving these problems and achieving the project goals.



# Purpose and Need

## Lake Elmo Airport

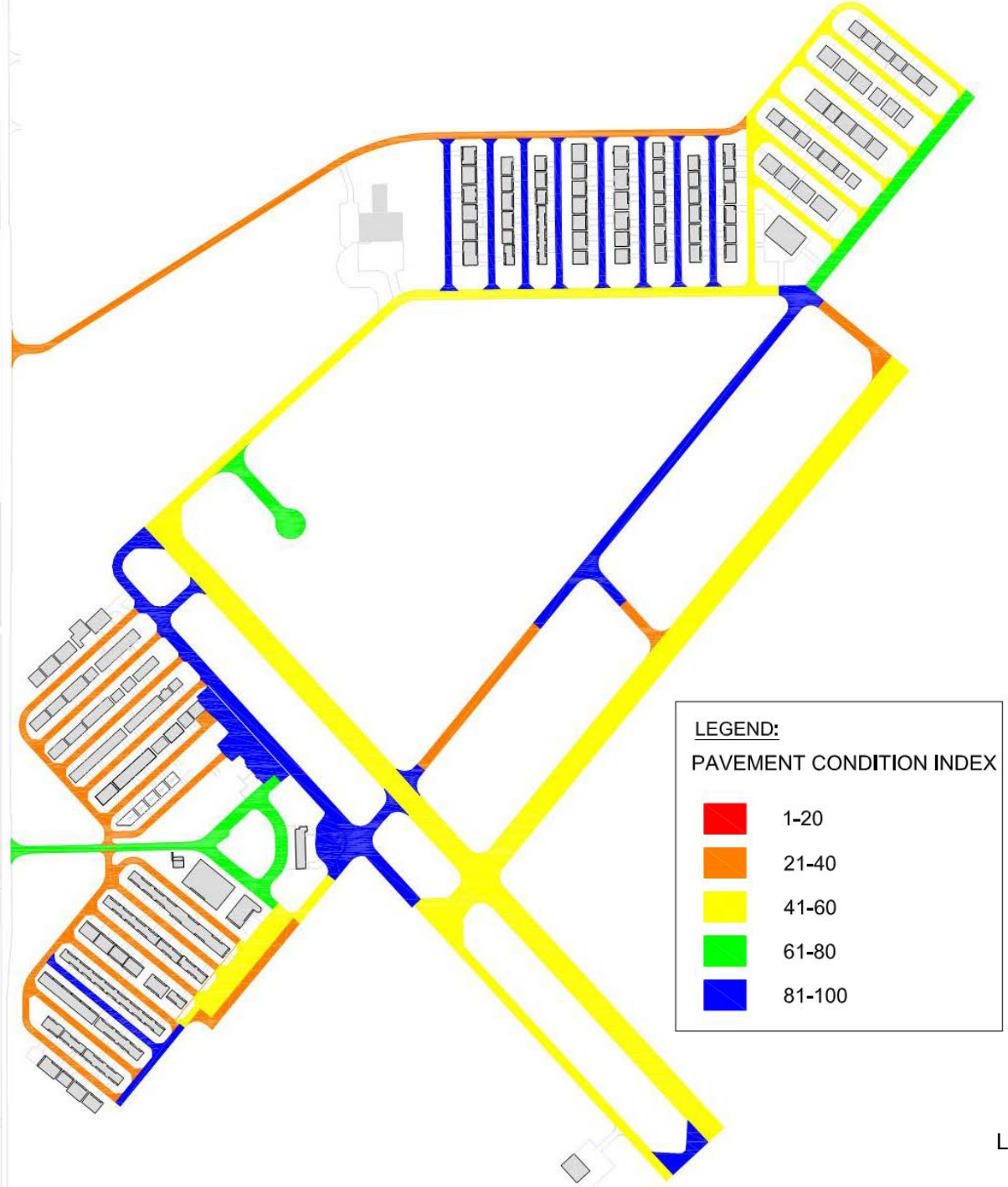
The **Purpose** of the project at Lake Elmo Airport is to pursue the following broader goals:

- 1) Address failing end-of-life infrastructure
- 2) Enhance safety for airport users and the general public
- 3) Improve facilities for the aircraft currently operating at the airport

The **Need** for the project at Lake Elmo Airport is based on the following specific objectives:

- 1) Improve the runway pavement conditions
- 2) Minimize incompatible land uses in the runway protection zones (RPZs)
- 3) Meet runway length needs for existing users
- 4) Upgrade the instrument approach procedures





# P&N Objective 1: Improve the Runway Pavement Conditions

- Both runways have pavement condition index (PCI) ratings between 41 and 60.
- Pavements in this PCI range usually require major repairs, from overlays to reconstruction.
- Once the PCI falls below 40, reconstruction is typically the only viable alternative.





# P&N Objective 2: Minimize Incompatible Land Uses in the RPZs

- Runway 14/32 has the following incompatible land uses within its RPZs:
  - Manning Avenue N
  - 30<sup>th</sup> Street N
  - Union Pacific Railroad
  - Private property





## Runway 14/32 Design Aircraft (less than 12,500 pounds)

Aircraft Model	Engine Type	Seat Capacity
Beechcraft King Air 200	Multi-Engine Turboprop	7 to 9
Pilatus PC-12	Single-Engine Turboprop	7 to 9
Cessna 421C	Multi-Engine Piston	6 to 8
Socata TBM 700	Single-Engine Turboprop	4 to 6
Piper PA-31 Chieftain	Multi-Engine Turboprop	5 to 7
Cessna 414A	Multi-Engine Piston	6 to 8
Cessna 340	Multi-Engine Piston	4 to 5
Cessna 310R	Multi-Engine Piston	5 to 6
Beechcraft Baron 58	Multi-Engine Piston	4 to 6
Piper PA-30 Twin Comanche	Multi-Engine Piston	4 to 6

## Runway 04/22 Design Aircraft (less than 5,000 pounds)

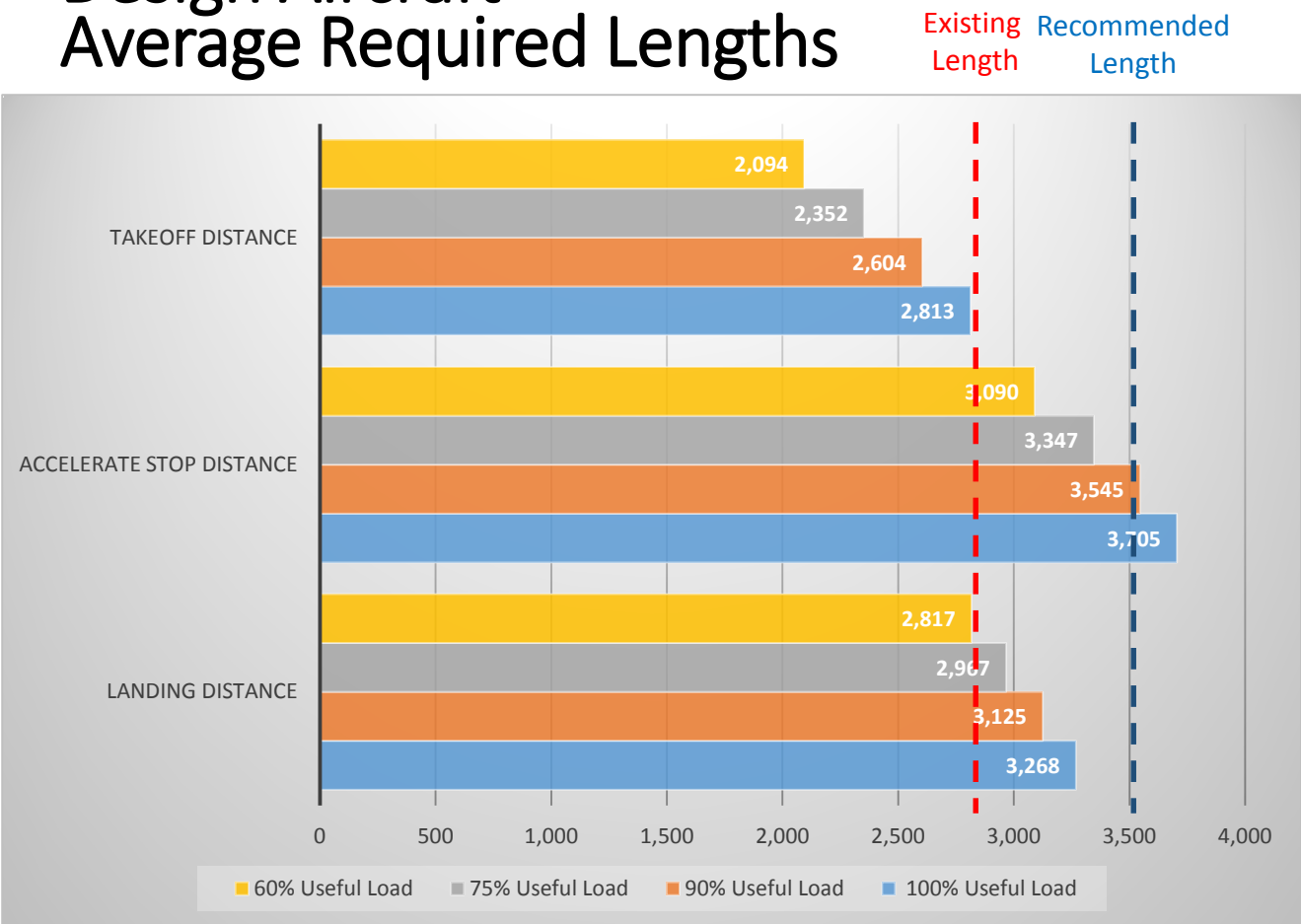
Aircraft Model	Engine Type	Seat Capacity
Piper PA-34 Seneca	Multi-Engine Piston	5 to 6
Piper PA-46 Malibu	Single-Engine Piston	5 to 6
Lancair IV	Single-Engine Piston	4
Piper PA-30 Twin Comanche	Multi-Engine Piston	4 to 6
Cirrus SR22	Single-Engine Piston	4 to 5
Beechcraft Bonanza 33	Single-Engine Piston	6
Mooney M20TN	Single-Engine Piston	4
Piper PA-28 Cherokee	Single-Engine Piston	4
Cessna 172	Single-Engine Piston	4

# P&N Objective 3: Meet Runway Length Needs for Existing Users

- Airfield design at Lake Elmo is based on a group of “design aircraft” with the following characteristics:
  - Wingspan less than 79 feet
  - Approach speed less than 121 knots
  - Gross weight less than 12,500 pounds
- Operations by existing airport users are currently limited by the current runway lengths.
  - Runway 14/32 = 2,849 feet
  - Runway 04/22 = 2,496 feet
- Optimum runway lengths are based on the needs of the “design aircraft” for each runway.



# Runway 14/32 Design Aircraft Average Required Lengths



# P&N Objective 3: Meet Runway Length Needs for Existing Users

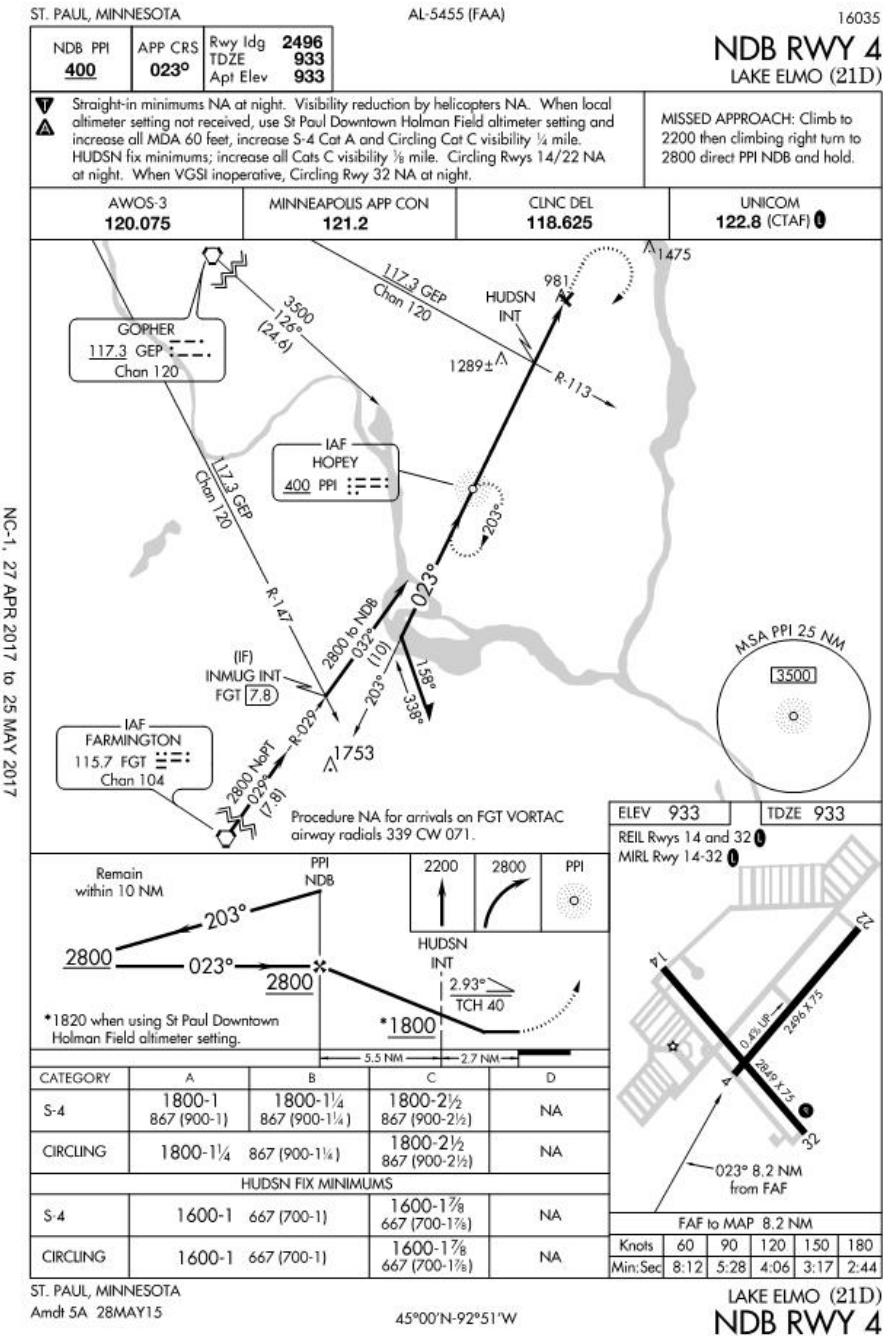
- Recommended Runway 14/32 length (3,500 feet) is based on a blend of takeoff, landing, and accelerate stop distance requirements of design aircraft.
- Recommended Runway 04/22 length (2,750 feet) is based on takeoff distance requirements of design aircraft at maximum takeoff weight.

Note: Landing distances adjusted to account for wet/slippery runway conditions, and to allow landing within 70% of the available runway length.



# P&N Objective 4: Upgrade the Instrument Approach Procedures

- Instrument approach procedures allow safer access to the airport, especially during inclement weather.
- Upgrading the runway approaches to modern navigational technology will improve airport safety and accessibility.



# Range of Alternatives Considered

## FAA Guidance

- Alternatives considered should:
  - Represent the range of reasonable alternatives.
  - Provide a clear basis for choice among options.
- No requirement for specific number or range of alternatives.
- Generally, the greater the degree of environmental effects, the wider the range of alternatives that should be considered.
- An EA may limit alternatives to the proposed action and no action if there are no conflicts concerning alternative uses of available resources.
- A preferred alternative should be identified by the EA.
- The EA should briefly explain why certain alternatives were eliminated from further study.



# Range of Alternatives Considered Lake Elmo Airport

- Criteria used to identify reasonable alternatives at Lake Elmo include:
  - Maintain Runway 14/32 and Runway 04/22 orientations
  - Avoid or minimize land acquisition
  - Avoid or minimize changes to airport use and aircraft flight patterns
- Five categories of alternative concepts will be considered by the EA:
  - No-Action Alternative
  - Primary Runway 14/32 Alternatives
  - 30<sup>th</sup> Street North Realignment Alternatives
  - Crosswind Runway 04/22 Alternatives
  - Instrument Approach Alternatives

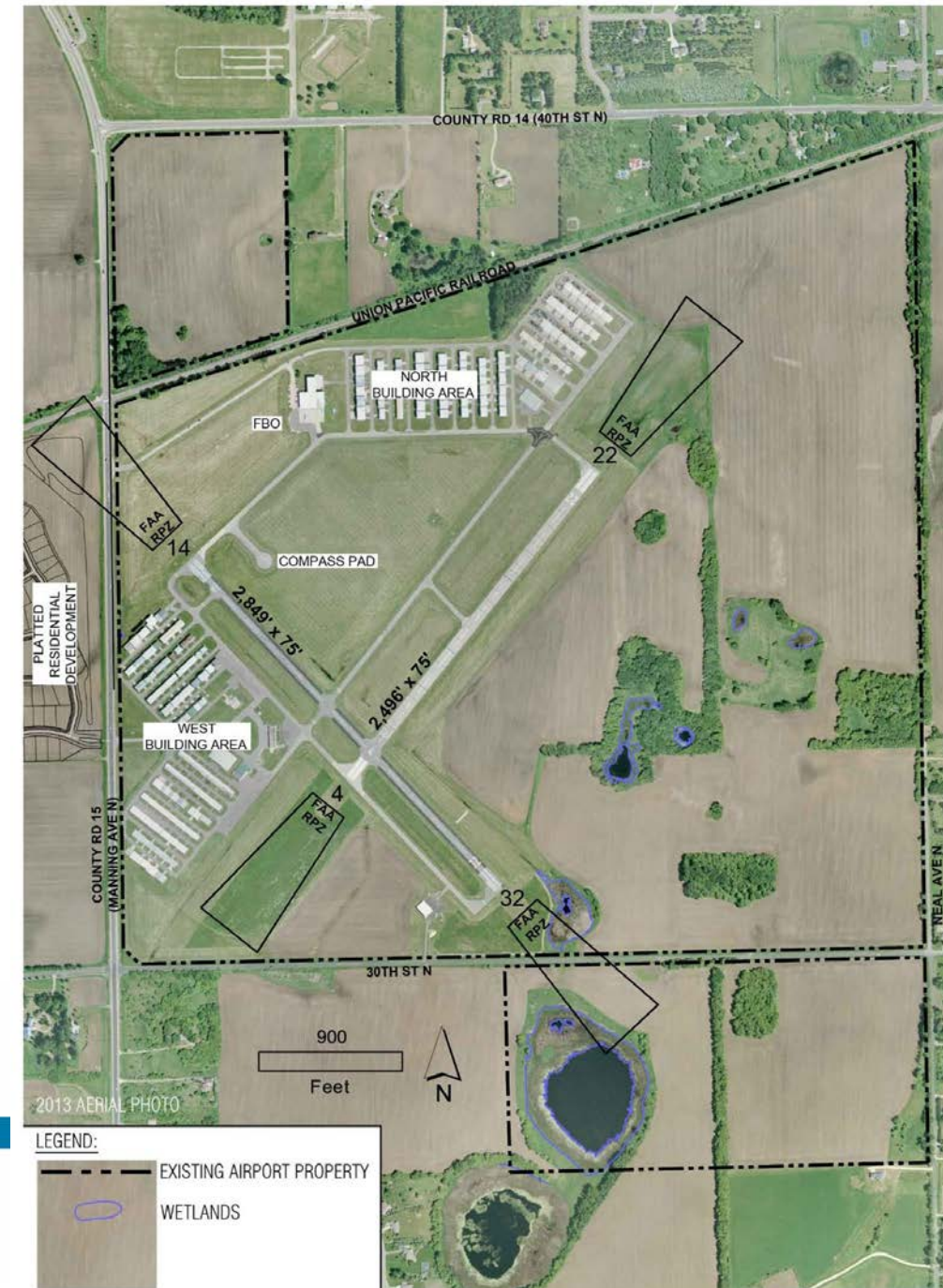




Figure ES-1: Existing Airport Layout

# No-Action Alternative

- Must be carried forward throughout the environmental review for comparison with the preferred alternative.
- Under this scenario, no improvements would be made to the airport.
- The airport would become increasingly unusable due to:
  - Failing pavement,
  - Incompatible land uses in the RPZs,
  - Inadequate runway length, and
  - Outdated/inadequate instrument approaches.
- This alternative does not meet the Purpose & Need.





# Primary Runway 14/32 Alternatives

- The LTCP considered five concepts.
- Supplemental planning identified three additional concepts.

Figure 5-1: Base Case Alternative Layout



Figure 5-2: Alternative A Layout



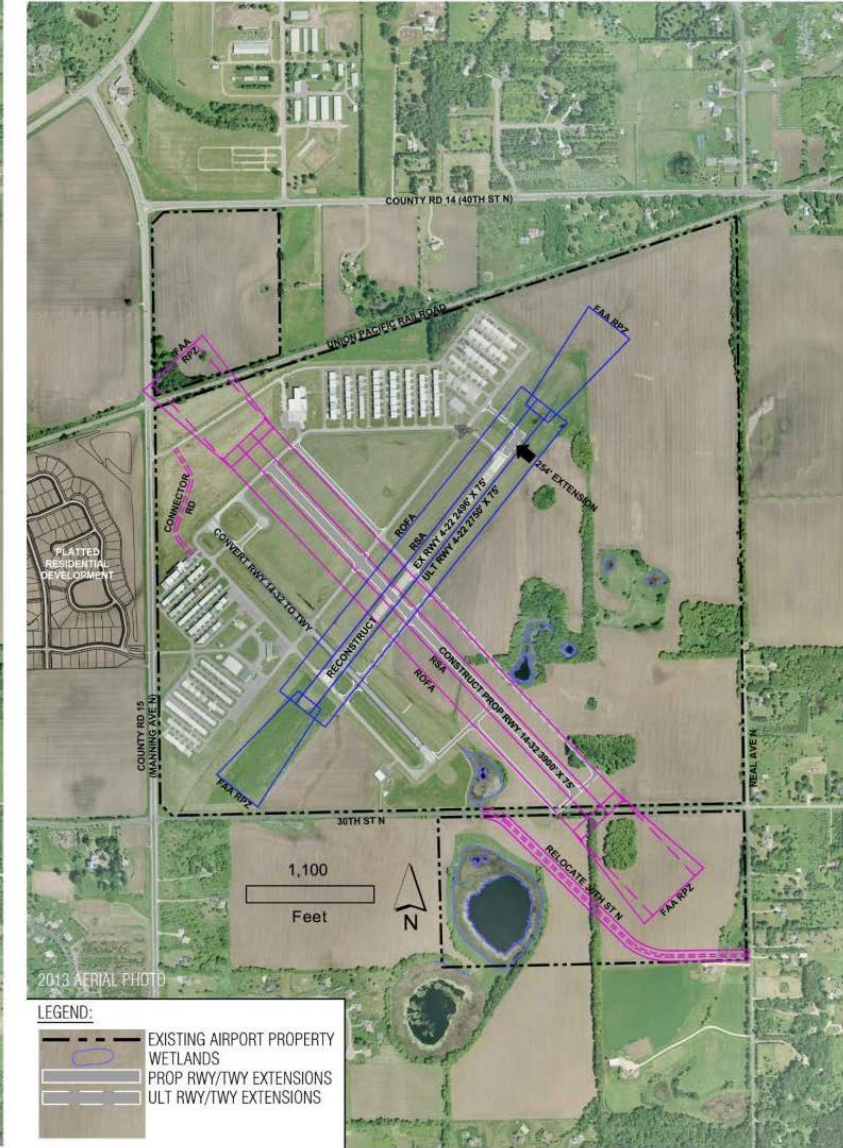
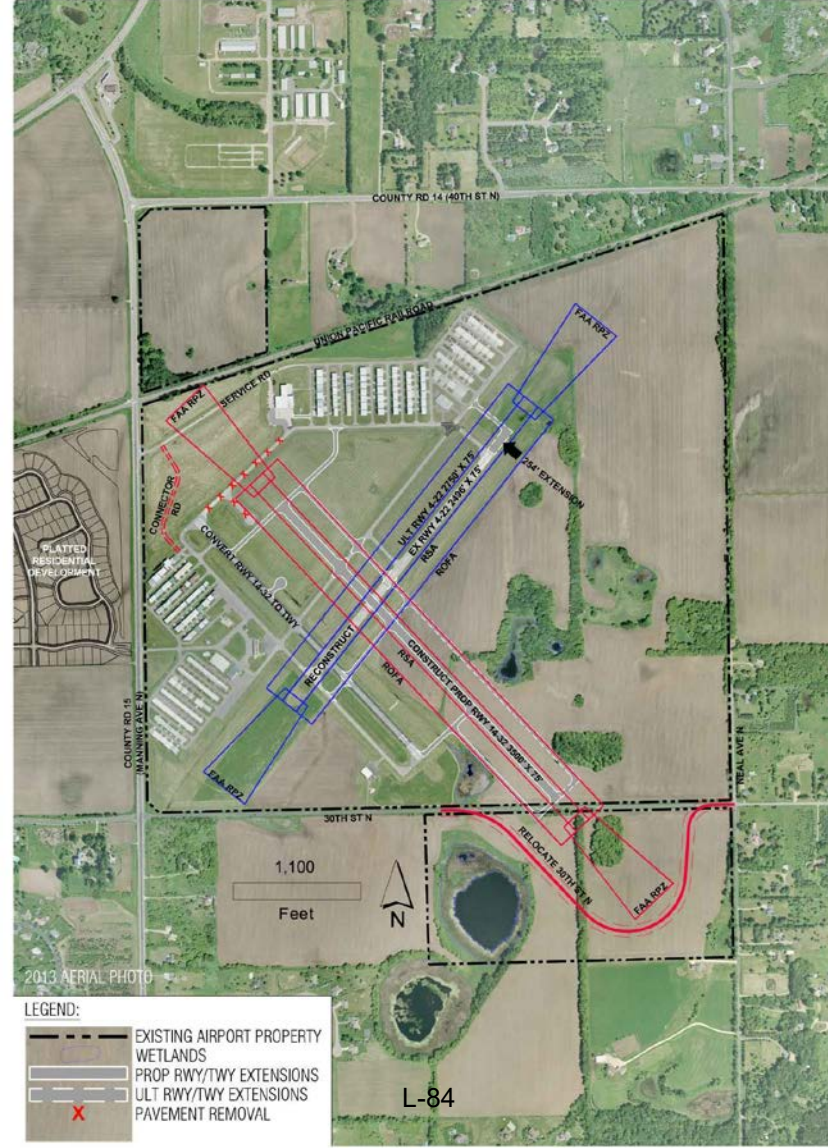
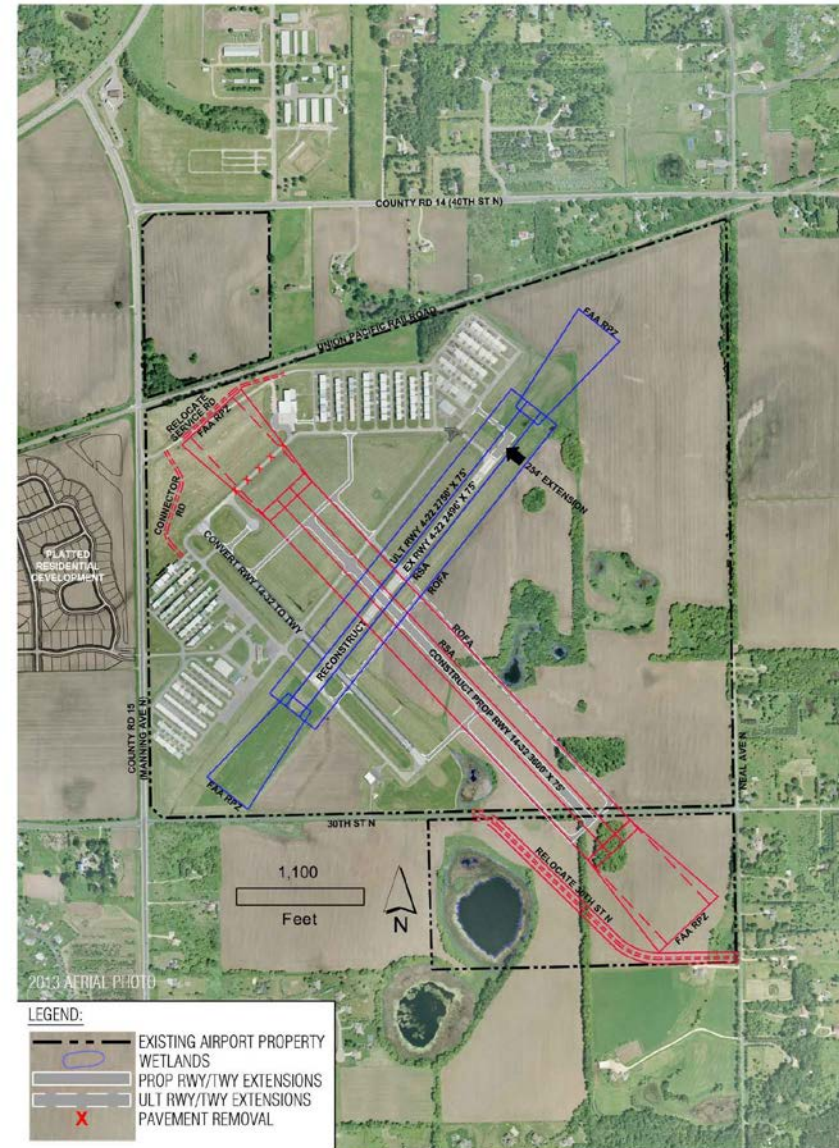


# Primary Runway 14/32 Alternatives

Figure 5-3: Alternative B Layout

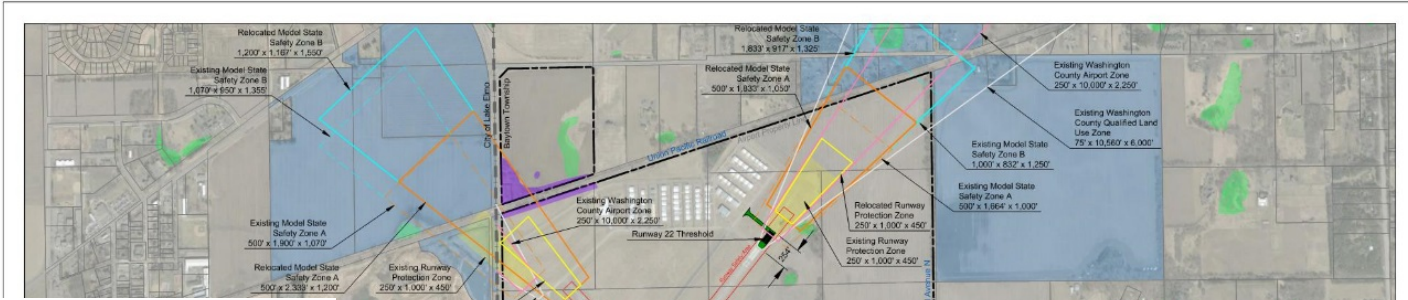
Figure ES-5: Alternative B1 (Final Preferred Alternative)

Figure 5-4: Alternative C Layout





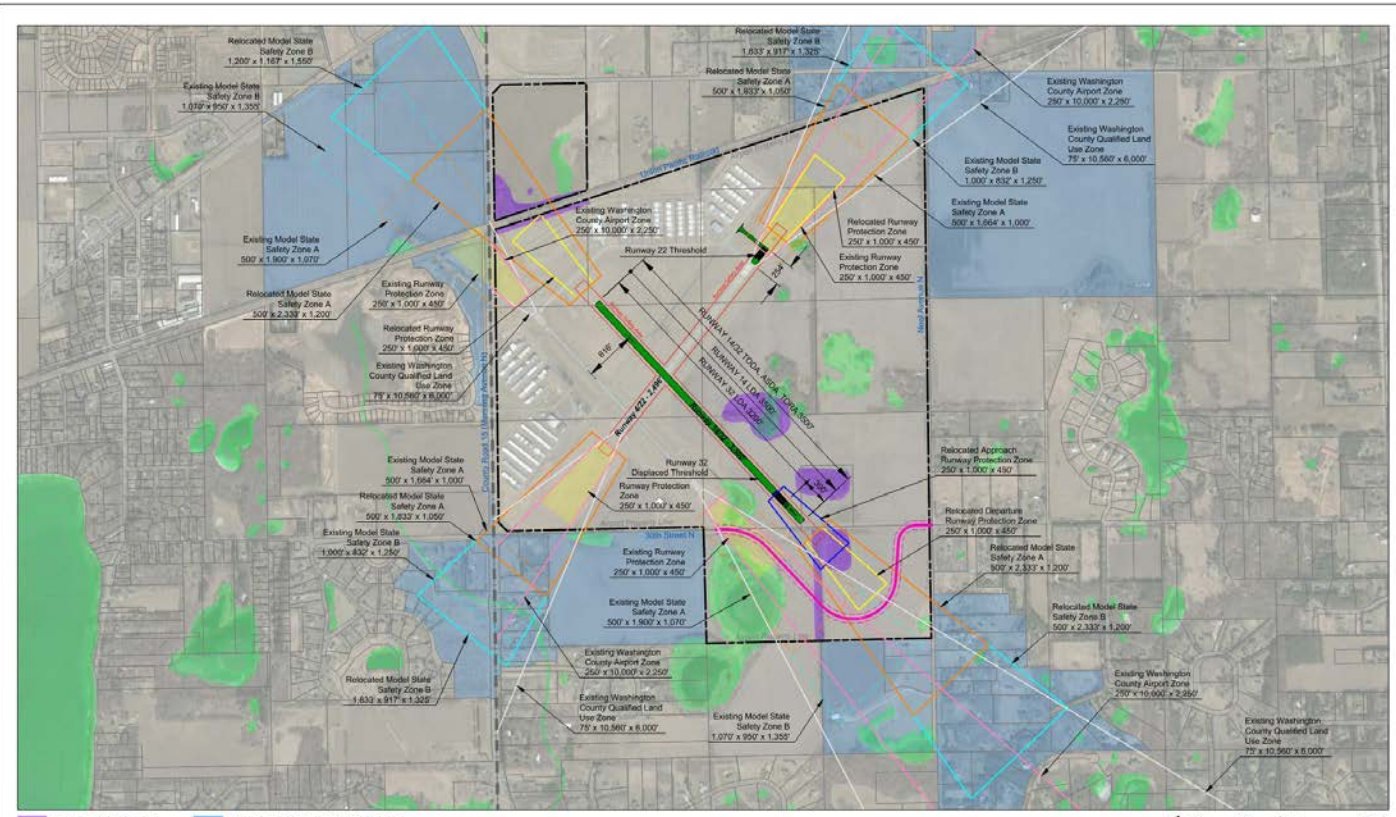
# Primary Runway 14/32 Alternatives



Model Zones A & B - are based on MnDOT guidance and do not necessarily reflect dimensions, which will be determined in coordination with a comprised of representatives from affected jurisdictions.

0 500 1000 2000  
GRAPHIC SCALE IN FEET

FIGURE 2  
Alternative D



0 500 1000 2000  
GRAPHIC SCALE IN FEET

L-85 FIGURE 3  
Alternative B2

Approximate Tree Removal  
Parcels Affected by State Model Zones A & B - State Model Zones shown are based on MnDOT guidance and do not necessarily reflect planned zone locations and dimensions, which will be determined in coordination with a joint Airport Zoning Board comprised of representatives from affected jurisdictions.

Lake Elmo Airport  
Runway 14-32

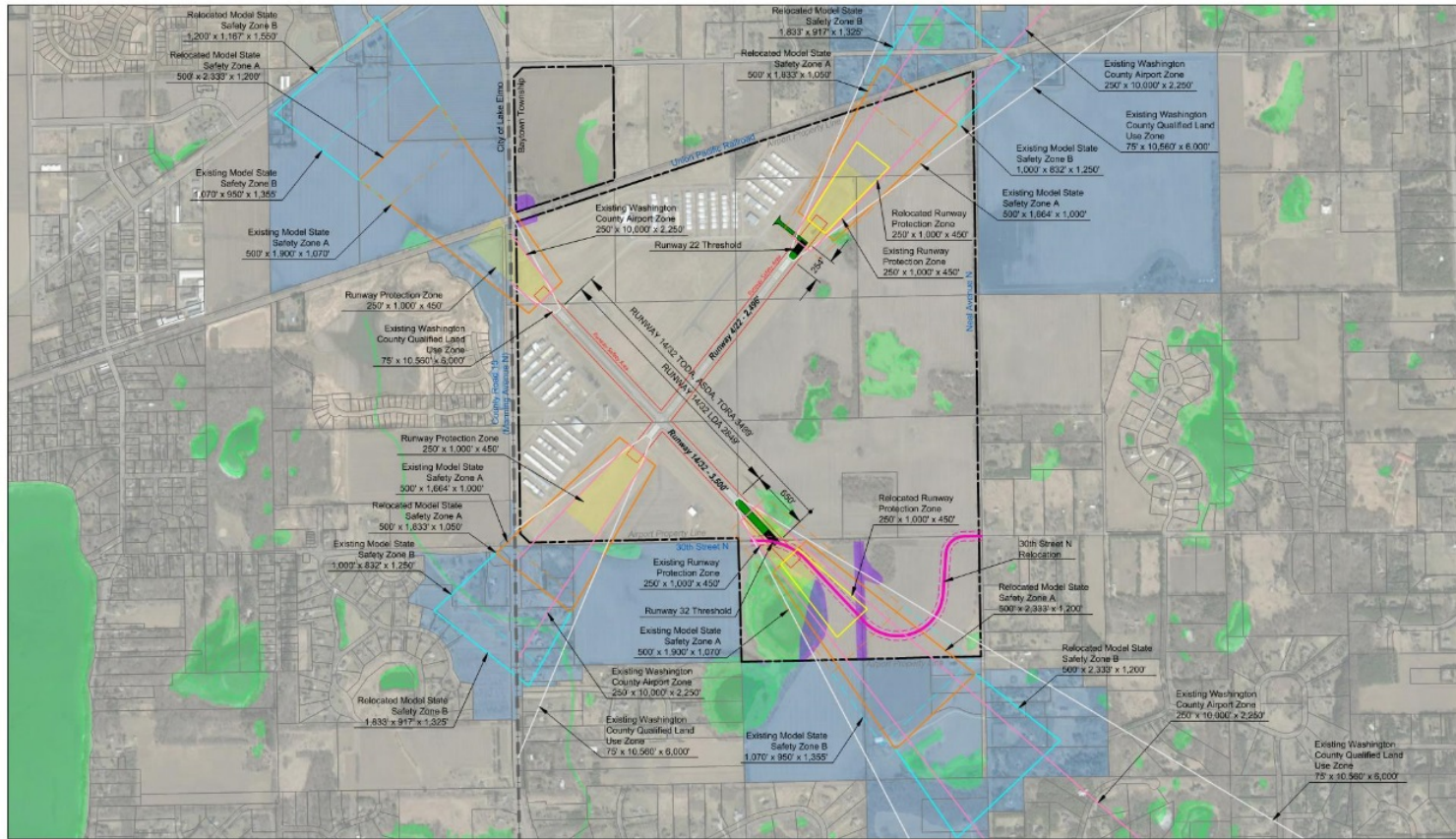




# Primary Runway 14/32 Alternatives

Of the eight Runway 14/32 concepts, only four meet the Purpose & Need.

- Alternative B
- Alternative B1
- Alternative B2
- Alternative D



Lake Elmo Airport  
Runway 14-32

Alternative E



# 30<sup>th</sup> Street North Realignment Alternatives

- The LTCP considered three concepts.
- Supplemental planning identified two additional concepts.



## **ALTERNATIVE 1**

- SPEED LIMIT: 45 mph
- COMPATIBLE WITH AIRFIELD ALTERNATIVE B (3,600')
- COMPATIBLE WITH AIRFIELD ALTERNATIVE C (3,900')
- ADDS 30TH ST N TRAFFIC TO A PORTION OF NEAL AVE N
- REQUIRES CONSTRUCTION OF ADDITIONAL INTERSECTION
- LOWEST COST ALTERNATIVE



## **ALTERNATIVE 2**

- SPEED LIMIT: 45 mph
- COMPATIBLE WITH AIRFIELD ALTERNATIVE B (3,600')
- COMPATIBLE WITH AIRFIELD ALTERNATIVE C (3,900')
- ADDS 30TH ST N TRAFFIC TO A PORTION OF NEAL AVE N
- REQUIRES CONSTRUCTION OF ADDITIONAL INTERSECTION
- HIGHEST COST ALTERNATIVE



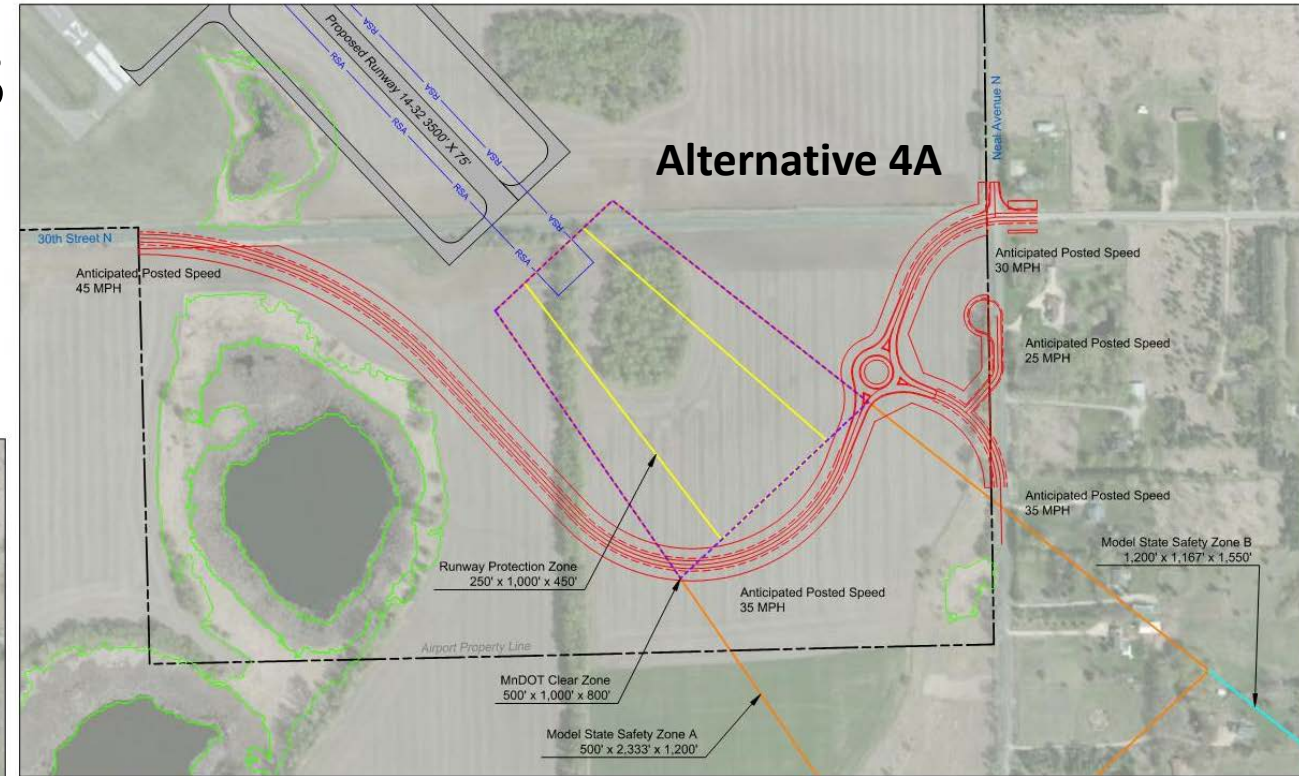
## **ALTERNATIVE 3**

- SPEED LIMIT: 30 mph
- RESTRICTS AIRFIELD ALT. B RUNWAY LENGTH TO 3,150'
- RESTRICTS AIRFIELD ALT. C RUNWAY LENGTH TO 3,760'
- NO ADDITIONAL INTERSECTION REQUIRED
- MIDDLE COST ALTERNATIVE

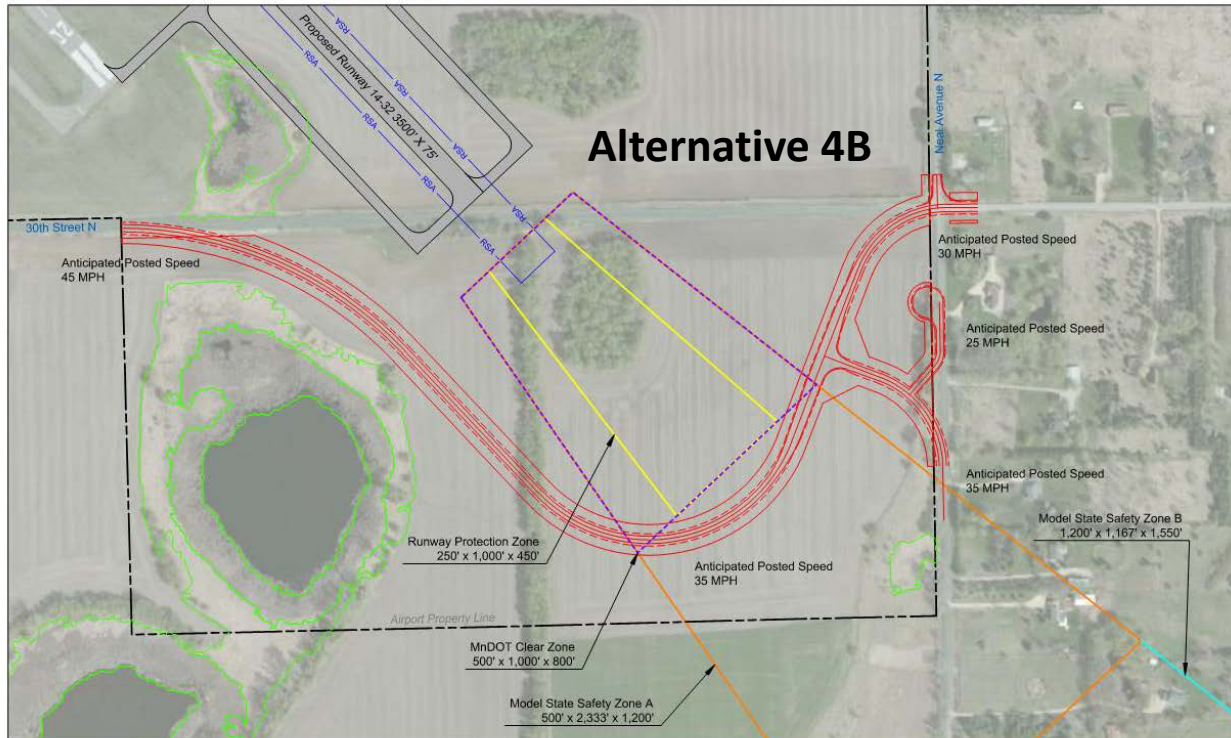


# 30<sup>th</sup> Street North Realignment Alternatives

- Alternatives 4A & 4B are modified hybrid versions of Alternatives 2 & 3.



L-88



# Crosswind Runway 04/22 & Instrument Approach Alternatives

- Crosswind Runway 04/22 LTCP Alternatives
  - Base Case Alternative (reconstruct only) – does not meet Purpose & Need
  - Preferred Alternative: Extend Runway 04/22 by 254 feet northeast
- Instrument Approach LTCP Alternatives
  - Preferred Alternative: Instrument Approach Upgrades
- Supplemental planning did not identify any additional alternatives for these categories.



# Alternatives to be Carried Forward into the EA Lake Elmo Airport

- No-Action Alternative
- Primary Runway 14/32
  - Alternatives B, B1, B2, & D
- 30<sup>th</sup> Street North Realignment
  - Alternatives 3, 4A, & 4B
- Crosswind Runway 04/22
  - Preferred Alternative from LTCP
- Instrument Approach
  - Preferred Alternative from LTCP



# Alternatives Evaluation Criteria

## Lake Elmo Airport

Evaluation criteria to be used in determining preferred alternatives for Runway 14/32 and 30<sup>th</sup> Street North realignment:

- 1) Purpose & Need
- 2) Practicability Factors
  - a) Financial factors
  - b) Operational factors
  - c) Logistical factors
- 3) Environmental Factors
  - a) Wetlands
  - b) Tree Removal
  - c) Wildlife
  - d) Aircraft Noise
  - e) Social Effects
  - f) Private Land Uses
  - g) Other Unique Effects

Note: This is not a comprehensive list of environmental analysis categories required under Federal and State regulations. A more comprehensive analysis of environmental effects will be completed for the no-action and preferred alternatives.



# Discussion/Questions

- CEP Meeting #3 planned for two weeks after second public event (tentatively July 2017)
- Topics for the next meeting will include:
  - A recap of the second public event
  - More on alternatives analysis
  - Initial work on Affected Environment and Environmental Consequences







# Lake Elmo Airport Federal EA / State EAW Community Engagement Panel Meeting #3

August 8, 2017  
6:00 P.M.



## Agenda

1. Proposed public event format changes
2. Efforts to address stakeholder input received at May meetings
  - a. Updated frequently asked questions (FAQ) posted to website
  - b. Baseline and forecast aircraft operations
  - c. 30<sup>th</sup> Street North design alternatives
  - d. Project schedule update
3. Recap – Purpose and Need
4. Alternatives evaluation process overview
  - a. No-Action Alternative
  - b. Primary Runway 14/32
  - c. 30<sup>th</sup> Street North
  - d. Crosswind Runway 04/22
  - e. Instrument Approach Procedures
5. Identification of Preferred Alternatives
6. Panel Discussion
7. 10-Minute Comment Period



**LAKE ELMO AIRPORT FEDERAL EA / STATE EAW**

# Community Engagement Panel

## Meeting #3 Minutes

Baytown Community Center

August 8, 2017

6:00 P.M.

### **Panel Attendees**

John Renwick  
Marlon Gunderson  
Mary Vierling  
Dave Schultz  
Kent Grandlienard  
Stephen Buckingham  
Ann Pung-Terwedo  
Chad Leque  
Neil Ralston  
Michael Madigan

### **Other Attendees**

Dana Nelson  
Joe Harris  
Brad Juffer  
Evan Barrett  
Stephanie Ward  
Chris Rossmiller  
Robert Sims

### **Public Observers**

Alison Griffin  
Tom Vierling  
Jennifer Foreman  
Jim Aronson  
Laura Bracklein  
Carl Bracklein  
Molly Olson  
Laura Kaschmitter  
Mick Kaschmitter

### **Representing**

Airport Tenant/User  
Airport Tenant/User and City of Lake Elmo Resident  
West Lakeland Township Resident  
West Lakeland Township Supervisor  
Baytown Township Supervisor  
Baytown Township Resident  
Washington County Public Works Planner  
Metropolitan Airports Commission Director of Environment  
Metropolitan Airports Commission Airport Planner  
MAC Commissioner District F

### **Representing**

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Mead & Hunt  
Mead & Hunt  
Mead & Hunt  
Mead & Hunt

### **Resident of**

Minneapolis  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township

# Meeting Minutes

Lori Gergen  
Lynette Spitzer

West Lakeland Township  
West Lakeland Township

## **Absent Panel Members**

Keith Bergmann  
Stephen Wensman  
Robin Anthony

## **Representing**

City of Lake Elmo Resident  
City of Lake Elmo Planning Director  
Greater Stillwater Chamber of Commerce

*The attached report represents this writer's interpretation of items discussed during the meeting. Any corrections or additional information should be brought to our attention for clarification.*

## **The purpose of the meeting was to:**

- Conduct a debrief on the efforts to address stakeholder input received at May meetings.
- Present the alternatives evaluation process and get feedback from the CEP on the material presented.
- Continue to equip CEP members to be the point of contact for information sharing, both to and from the community and MAC, and to respond to inquiries from their constituent groups.

## **The presentation was as follows:**

Evan Barrett opened the meeting by welcoming everyone, reviewing the agenda and explaining the format for the meeting. He proposed that the presentation take place first followed by CEP comments and questions, and then a ten-minute public comment period would take place at the end of the meeting. The CEP agreed to the proposed format.

Dana Nelson explained the new format proposed for the next public meeting. Changes include a local consultant hired to act as a facilitator; non-verbal options for the public to express their concerns; and changes to the question and answer session. Dana also mentioned the FAQs on the website were updated to reflect recent questions and concerns from the public and provided the CEP with the FAQ document. She then asked for any concerns or other ideas. Upon receiving no responses from the CEP, she turned the meeting back over to Evan Barrett.

Evan Barrett provided a review of baseline and forecast aircraft operations by aircraft category, the method of collecting data through the MAC Noise and Operations Monitoring System (MACNOMS), and how the preferred alternative should meet existing and anticipated aviation demand.

Evan then discussed efforts to respond to stakeholder concerns about the 30<sup>th</sup> Street North realignment, including coordinating with the Baytown fire chief to review emergency response considerations and meeting with West Lakeland Township CEP members and homeowners most affected by new roadway alternatives.

Kent Grandlienard asked about the direction of fire response shown in the alternative. He believed fire response would not approach from the west. Evan Barrett stated that there are several different scenarios for fire response and, depending on who responded, they may come from different directions. Neil Ralston also mentioned that water shuttles to the nearest hydrant may necessitate trucks going to and approaching from the west, and fire response to the airport itself would require Bayport Fire

## Meeting Minutes

Department to use the realigned portion of 30<sup>th</sup> Street North. Kent agreed that the direction of approach would depend on who was responding.

Evan Barrett discussed the project team's effort to evaluate alternate designs for 30<sup>th</sup> Street North to address the primary concerns from the CEP and the community, which included increased travel time, safety and project cost. Evan said based on the CEP response at its May meeting, the alternatives that included a cul-de-sac and potential round-about will not be considered further.

Evan Barrett then reviewed the schedule, purpose and need, and the criteria used to determine whether an alternative would be considered further. He emphasized the purpose of the Environmental Assessment (EA) and how the alternatives analysis fits into that process. Evan then introduced the five categories of alternatives that would be discussed: no-action, primary runway, 30<sup>th</sup> Street North realignment, crosswind runway and instrument approaches. Evan stated that, as the primary runway would impact the rest of the alternatives, it would be examined first and subsequent decisions made on the other alternative categories.

Evan described that the no-action alternative would not involve any improvements beyond maintaining the existing airfield and although it does not meet the purpose and need, the alternative must be carried forward throughout the process for comparison with the preferred alternative. Evan then walked through the evaluation process for the primary runway alternatives using a funnel graphic to depict the criteria used to first identify alternatives, and second, to screen the alternatives based on the purpose and need, compliance with FAA policies, and compatibility with a viable 30<sup>th</sup> Street North realignment alternative. He then described that the finalist alternatives were compared with one another based on objective practicability and environmental factors. Evan then detailed each of the eight primary runway alternatives and explained the results of the screening process, which identified Alternatives B and B1 as the two alternatives that met the screening criteria.

Ann Pung-Terwedo asked about the implications of the proposed improvements for Manning Avenue. Evan Barrett stated that one of the objectives of the proposed improvements is to clear Manning Avenue from the RPZ. Its planned expansion to four lanes would trigger an RPZ study by FAA. Stephen Buckingham asked how that is justified, as expansion to a four-lane road would not necessarily affect the amount of traffic on the road, but instead development in the area was driving the increase in traffic. Neil Ralston replied that the road expansion was the trigger point for the FAA analysis. Stephen then clarified his point by saying the traffic would occur regardless of the expansion from two to four lanes. Evan Barrett replied that the RPZ policy states any proposed change in the land use within the RPZ would trigger a study.

Dana Nelson explained the concept of a displaced threshold and how it may be used to mitigate aircraft noise. She provided background on the FAA noise policies, including how aircraft noise is measured. She stated that FAA policy considers the 65 Day-Night Average Sound Level (DNL) to be the threshold of significance for noise impacts around airports. Dana discussed how noise impacts were analyzed for Alternative B1 and for the displaced threshold alternative (Alternative B2) and in both scenarios, the 2025 forecast 65 DNL noise contour did not extend beyond airport property. Additionally, the project team calculated the DNL level at the nearest residential area under the extended runway centerline and found that a 200-foot displaced threshold would not change the DNL level in that location and would result in a less than 20-foot difference in altitude for arriving aircraft. Based on the result of this analysis, the FAA would not support Alternative B2. Dana stated that there are specific noise abatement procedures that the MAC encourages pilots to observe. She mentioned the MAC's voluntary Noise

## Meeting Minutes

Abatement Plan for Lake Elmo Airport, the signs that are on the airfield to remind pilots to fly neighborly, and pilot outreach and communication efforts, and concluded by mentioning upcoming events for pilots and members of the community.

Evan Barrett then discussed the finalist alternatives with respect to practicability factors and environmental factors. A summary of the three alternatives was displayed and Evan summarized why Alternative B1 was selected to be carried forward in the environmental evaluation as the preferred alternative.

A review of preferred alternatives for the primary runway, 30<sup>th</sup> Street North, the crosswind runway and instrument approaches was provided before Evan displayed a composite graphic of all preferred alternatives. He ended the presentation by opening discussion by the CEP.

### **The CEP discussion occurred as follows:**

Stephen Buckingham stated that the purpose and need appeared to be tailored to select a predetermined alternative and expressed concern that the purpose and need does not consider the needs of the community. Kent Grandlienard stated that the alternatives evaluation process for Lake Elmo Airport has been going on for several years and that the alternatives have changed over time based on community involvement. Chad Leqve stated that the team working on the project has looked in detail at multiple options and that if the CEP were to support a specific alternative for 30<sup>th</sup> Street North, he would advocate for it at the MAC.

John Renwick stated the pavement is at the end of its useful life and that the purpose and need is based on actual issues with the existing airfield, including inadequate runway length and incompatible land uses. Stephen Buckingham reiterated his concern that the purpose and need did not consider impacts to residents. Chad Leqve stated that the runway length has been reduced and roadway alternatives have been examined to account for community concern and that the constraints of the existing site limit what can be done.

Marlon Gunderson stated that 30<sup>th</sup> Street has no shoulders and cars must share one lane to accommodate bicyclists. He asked if there would be shoulders added to the road to accommodate bicycles. Interest was also expressed for a bike trail. Kent Grandlienard stated that interest in bicycle trails and shoulders have been expressed in the past and are generally desirable but usually cost prohibitive. Evan stated that the new alternatives were designed using appropriate state and local design standards, including expanded shoulders.

Dave Schultz stated that, based on airnav.com, the pavement at Lake Elmo Airport appears to be in good condition and expressed concern that the pavement at Lake Elmo did not require as much repair as expressed by the purpose and need. Evan Barrett stated that airnav.com uses a different set of FAA criteria than the industry-standard engineering pavement condition criteria used by the purpose and need. Chad Leqve asked for clarification whether Dave was concerned that the condition of the Lake Elmo Airport pavements was being misrepresented. Dave confirmed that was his concern. Joe Harris stated the pavement was in poor condition, that frost heaving during the spring was negatively affecting the runways, and that the pavement was at the end of its useful life. Dave Schultz asked if constructing the pavement in place was examined. Evan Barrett stated that this was the no-action alternative. Dave Schultz thanked everyone for the clarification and stated he was glad that this was being considered.



## Meeting Minutes

Dana Nelson explained that the presentation at the next public meeting would be like what Evan Barrett presented earlier but welcomed new ideas for the team to consider. Mary Vierling asked if the MAC had control over military operations, as what appear to be military helicopters have conducted late night/early morning operations over residential areas. Kent Grandlienard agreed and said medevac and news helicopters may also be a factor. Dana Nelson explained that the MAC does not control military operations or the flying public in general. Chad Leqve stated that, even though legislative control is not possible, successful coordination with the flying community can and has taken place at MAC airports to reduce aircraft noise.

Dave Schultz asked why the crosswind runway extension had been reduced when compared to Alternative A. Evan Barrett replied that Alternative A considered extending the crosswind runway rather than the primary runway. This would not correct the RPZ issue and that extending the crosswind runway instead of the primary runway would not best meet the purpose and need because it is not aligned with the prevailing winds. He further stated that the shorter crosswind runway length is based on the needs of lighter, less crosswind capable aircraft. Neil Ralston stated that hourly wind data from the airport has only been available since 2008 and with improved data it was confirmed that the primary runway is superior to the crosswind runway in terms of wind coverage. Evan Barrett stated that the primary runway alignment at Lake Elmo Airport is common for airports in this area.

Dave Schultz asked why the property under the RPZ hadn't been purchased by MAC in the past. Chad Leqve stated that this has been considered in the past but that it was expensive and there were other options available to address the RPZ issue without affecting Manning Avenue. These other options would also allow MAC to be more responsible with their finances. Dana Nelson added that previous plans over several decades proposed realigning the primary runway in this manner within the existing property boundary so that buying additional property within the RPZ would not be required.

Evan Barrett emphasized the importance of feedback from the local community. Members of the CEP and MAC coordinated schedules for the next CEP meeting, selecting a tentative date of October 19<sup>th</sup>, and the meeting was opened to comments from the public in attendance.

### **The public comment period occurred as follows:**

A citizen stated that she was hearing impaired and microphones should be used to allow everyone to hear the discussion. She asked how many homes were within a two-mile radius when the plan was originally considered compared to today, and requested that MAC personal phone numbers be made available so they can be contacted whenever aircraft noise is an issue. She concluded by saying that recording her request and providing an answer later was adequate.

Another citizen asked how many cars a day use Manning Avenue. Ann Pung-Terwedo replied that it was over 10,000 but she was unsure of the exact number.

Another citizen stated they heard the airport was unsafe. Michael Madigan stated that nobody was claiming the airport was unsafe but that the longer runway would increase the margin of safety. The citizen stated they must have misheard the current condition of the airport. This citizen then asked why the no-action alternative was referred to as "no action", as it includes reconstructing the runway. Marlon Gunderson stated that this was because the airport configuration wouldn't change. Evan Barrett stated that the purpose of the no-action alternative is to provide a baseline to which the other

## Meeting Minutes

alternatives should be compared. Dana Nelson and Chad Leqve stated that the term “no-action” comes from the FAA. The same member of the public asked who was paying for the project. Chad Leqve replied that the funds would be generated by users of the airport system.

Dave Schultz discussed runway lengths at surrounding airports and questioned whether Lake Elmo needed the runway length proposed. Neil Ralston and Evan Barrett replied that, when the longest runway is considered for each airport in the intermediate airport category of the state system plan, Lake Elmo’s primary runway is comparatively short. Neil Ralston stated that the goal of the project was to allow the airport to better fulfill its existing role and not to expand the role of the airport.

A citizen stated that they like having the airport in the area, but that the road is already unsafe and introducing a curve in the road will only make it more dangerous. She stated that she often rides her horse along the side of the road and, during the winter, cars will often lose control and end up in the ditch. Evan Barrett stated that the design for each alternative is based on the local and state standards associated with the specific design speeds. Kent Grandlienard agreed this issue has been examined before but a satisfactory change could not be found and drivers should drive more slowly. John Renwick asked if guard rails were planned for the road. Evan Barrett and Chris Rossmiller stated that the road would be super-elevated to assist cars in cornering, appropriate signage would be posted, and other measures would be considered to maximize safety.

A member of the public asked if airport activity has been declining and, if so, why the runway was being extended. Chad Leqve stated that the proposed runway length is based on the type of operations that require a longer runway and not an increase in activity. This citizen then asked if an alternative has already been selected by the MAC regardless of the outcome of public input. Chad Leqve explained this meeting was part of the process to gather public input and then select an alternative based on the criteria presented and input received. This citizen then asked if the MAC has applied for waivers. Neil Ralston stated there is a process to apply for waivers if necessary. This citizen then asked if Mead & Hunt has been hired as an advocate for the MAC. Evan Barrett stated that Mead & Hunt has been hired to assist the MAC through the required state and federal environmental review process for the proposed improvements.

Marlon Gunderson asked if airport activity has decreased. Neil Ralston stated that numbers have decreased in the past but general stability in aircraft operations is expected in the future. Kent Grandlienard stated new aircraft often require longer runway lengths as technology is changing.

Evan Barrett closed the meeting at 8:14 P.M.



# Lake Elmo Airport

## Environmental Assessment (EA)/ Environmental Assessment (EAW) Worksheet



August 8, 2017 – Community Engagement Panel Meeting #3  
Alternatives Evaluation Process & Identification of Preferred Alternatives



# Agenda

- Proposed public event format changes
- Efforts to address stakeholder input
- Recap – Purpose & Need
- Alternatives evaluation process
- Identification of Preferred Alternatives
- Panel discussion
- 10-minute comment period





# Proposed Public Event Format Changes

- Use of a facilitator
- Q&A format changes
- Top concerns sticker board at sign-in
- Improve readability of presentations



# Efforts to address stakeholder input

- Updated frequently asked questions posted to website
- Baseline and forecast aircraft operations
- 30<sup>th</sup> Street North design alternatives
- Project schedule update



# Baseline and Forecast Aircraft Operations

- 2016 MACNOMS flight tracking system data analyzed to establish baseline for noise analysis
- 25,596 total estimated aircraft operations in 2016 is consistent with the LTCP forecast for 2016
- Based on analysis of aircraft type information in MACNOMS, operations by the different aircraft classes were estimated
- These baseline and forecast operations by aircraft type will be included in the EA/EAW

Aircraft Type	2016 Baseline		2025 Forecast (Extended Forecast Scenario)	
	Operations	Percentage	Operations	Percentage
Single Engine Piston	24,053	93.97%	22,563	93.00%
Multi-Engine Piston	498	1.95%	607	2.50%
Turboprop	63	0.25%	243	1.00%
Jet	3	0.01%	24	0.10%
Helicopter	979	3.82%	825	3.40%
<b>Total Operations</b>	<b>25,596</b>		<b>24,261</b>	



# 30<sup>th</sup> Street North Realignment Alternatives

- The LTCP considered three concepts.
- Supplemental planning identified two additional concepts as presented at the May CEP meeting.



## **ALTERNATIVE 1**

- SPEED LIMIT: 45 mph
- COMPATIBLE WITH AIRFIELD ALTERNATIVE B (3,600')
- COMPATIBLE WITH AIRFIELD ALTERNATIVE C (3,900')
- ADDS 30TH ST N TRAFFIC TO A PORTION OF NEAL AVE N
- REQUIRES CONSTRUCTION OF ADDITIONAL INTERSECTION
- LOWEST COST ALTERNATIVE



## **ALTERNATIVE 2**

- SPEED LIMIT: 45 mph
- COMPATIBLE WITH AIRFIELD ALTERNATIVE B (3,600')
- COMPATIBLE WITH AIRFIELD ALTERNATIVE C (3,900')
- ADDS 30TH ST N TRAFFIC TO A PORTION OF NEAL AVE N
- REQUIRES CONSTRUCTION OF ADDITIONAL INTERSECTION
- HIGHEST COST ALTERNATIVE



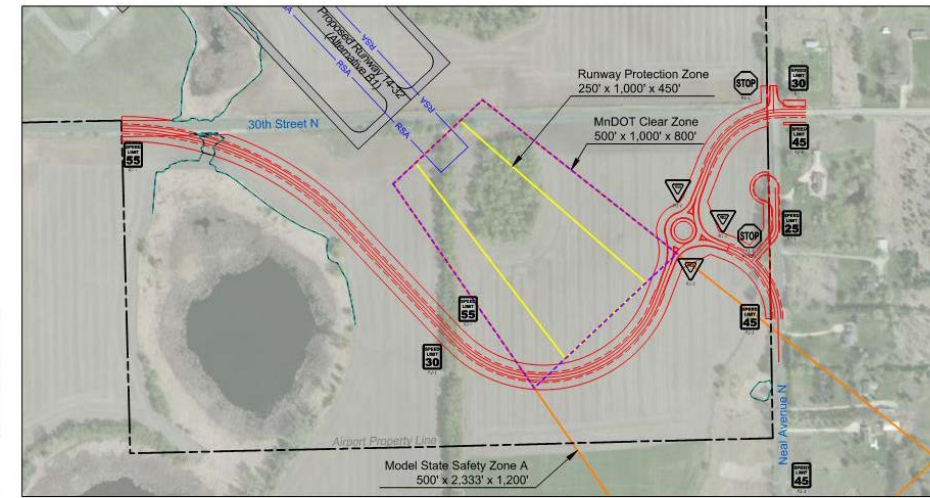
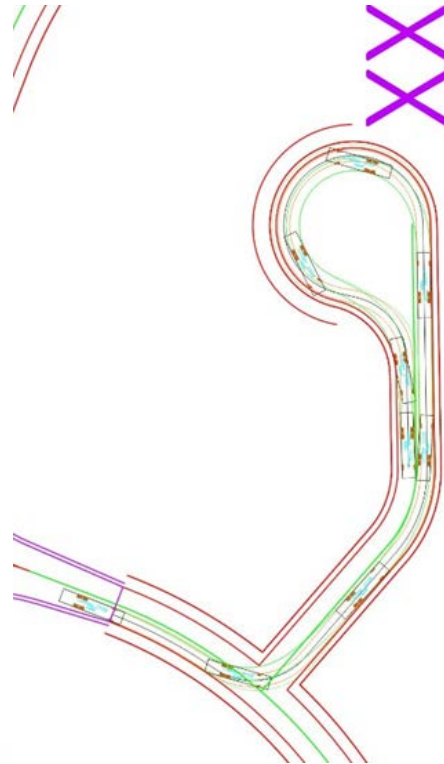
## **ALTERNATIVE 3**

- SPEED LIMIT: 30 mph
- RESTRICTS AIRFIELD ALT. B RUNWAY LENGTH TO 3,150'
- RESTRICTS AIRFIELD ALT. C RUNWAY LENGTH TO 3,760'
- NO ADDITIONAL INTERSECTION REQUIRED
- MIDDLE COST ALTERNATIVE

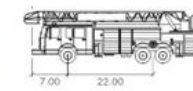


# 30<sup>th</sup> Street North Design Alternatives

- Met with West Lakeland CEP members and homeowners most affected by new Alternatives 4A & 4B
- Met with Bayport Fire Chief
  - Modeled specific vehicle turning movements for cul-de-sac
  - Identified specific concerns regarding availability of fire hydrants and potential mitigation measures
- Evaluated alternate designs to address three primary concerns expressed by the CEP and community:
  - Estimated construction cost
  - Compared design characteristics
  - Quantified travel time differences
- Based on project cost and initial CEP response, Alternatives 4A & 4B will not be considered further

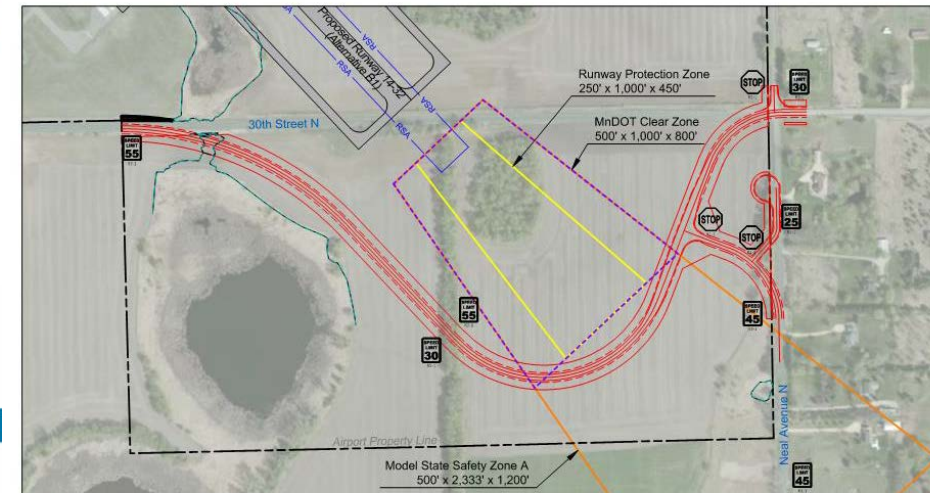


Alternative 4A



Ladder 2109

	feet
Width	8.50
Track	8.50
Lock to Lock Time	6.0
Steering Angle	33.3

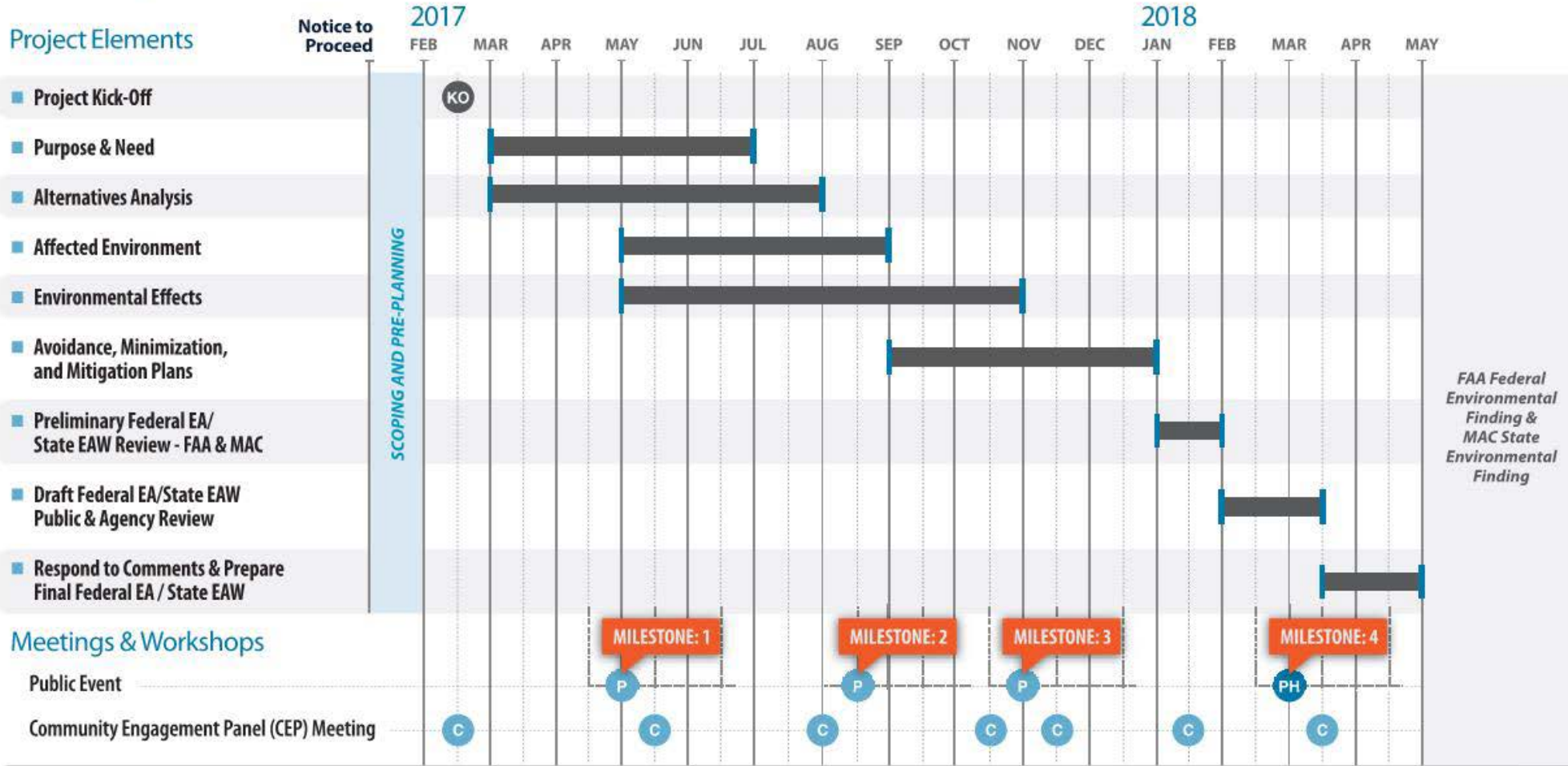


Alternative 4B

- Proposed Realignment
- Approximate Wetland Areas (U.S. Fish and Wildlife Service National Wetlands Inventory)
- Delineated Wetland Boundary



# EA Project Timeline



## Project Schedule Update

- Time Frame
- Kickoff Meeting (KO)
- Public Event (P)
- Community Engagement Panel (CEP) Meeting (C)
- Public Hearing (PH)

Note: Schedule updated August 8, 2017. Subject to change.



# Recap – Purpose and Need

The **Purpose** of the project at Lake Elmo Airport is to pursue the following broader goals:

- 1) Address failing end-of-life infrastructure
- 2) Enhance safety for airport users and the general public
- 3) Improve facilities for the aircraft currently operating at the airport

The **Need** for the project at Lake Elmo Airport is based on the following specific objectives:

- 1) Improve the runway pavement conditions
- 2) Minimize incompatible land uses in the runway protection zones (RPZs)
- 3) Meet runway length needs for existing users
- 4) Upgrade the instrument approach procedures



# Range of Alternatives Considered

## FAA Guidance

- Alternatives considered should:
  - Represent the range of reasonable alternatives.
  - Provide a clear basis for choice among options.
- No requirement for specific number or range of alternatives.
- Generally, the greater the degree of environmental effects, the wider the range of alternatives that should be considered.
- An EA may limit alternatives to the proposed action and no action if there are no conflicts concerning alternative uses of available resources.
- A preferred alternative should be identified by the EA.
- The EA should briefly explain why certain alternatives were eliminated from further study.



# Range of Alternatives Considered

- Five categories of alternative concepts will be considered by the EA/EAW:
  - No-Action Alternative
  - Primary Runway 14/32 Alternatives
  - 30<sup>th</sup> Street North Realignment Alternatives
  - Crosswind Runway 04/22 Alternatives
  - Instrument Approach Alternatives

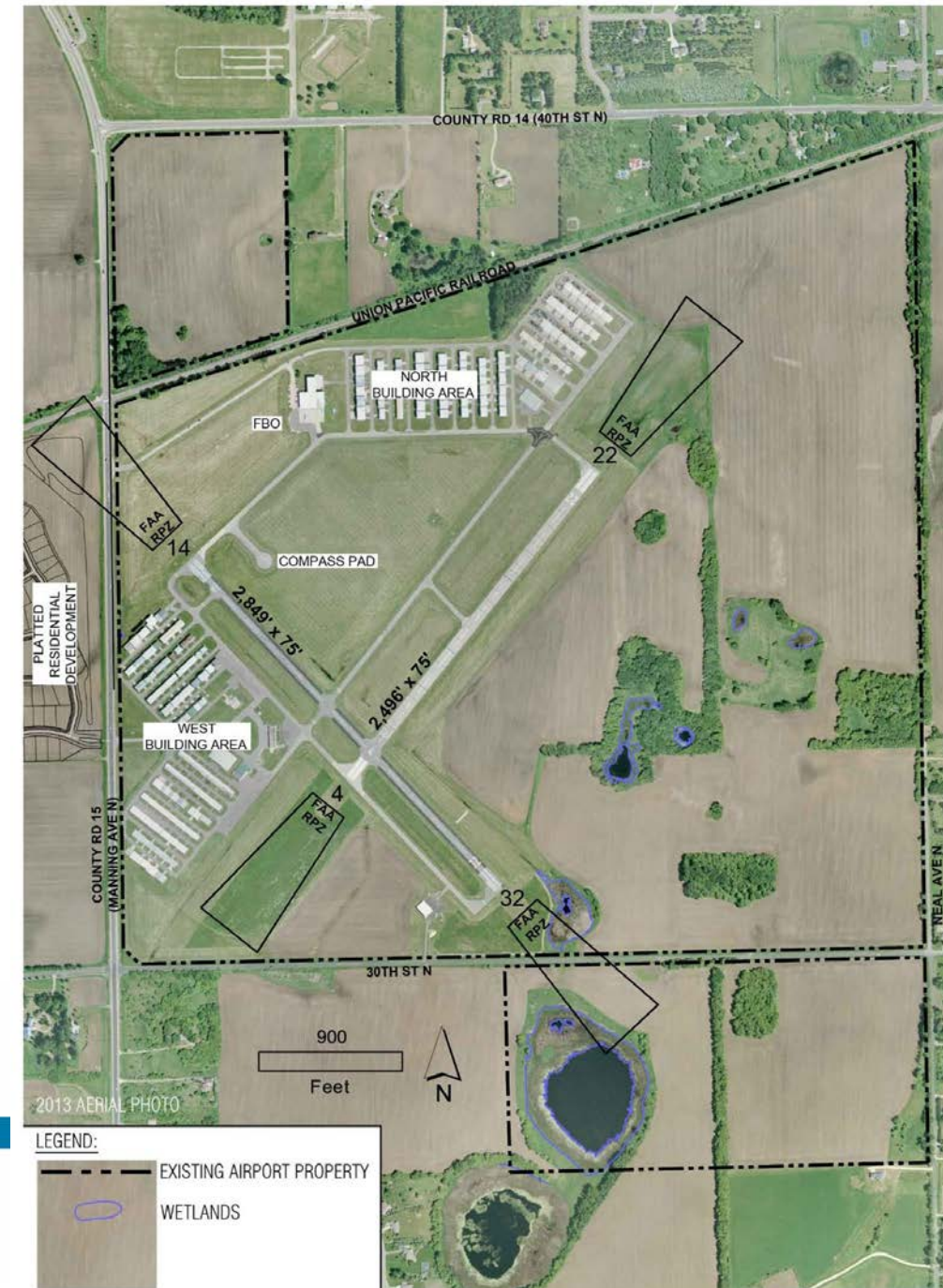




Figure ES-1: Existing Airport Layout

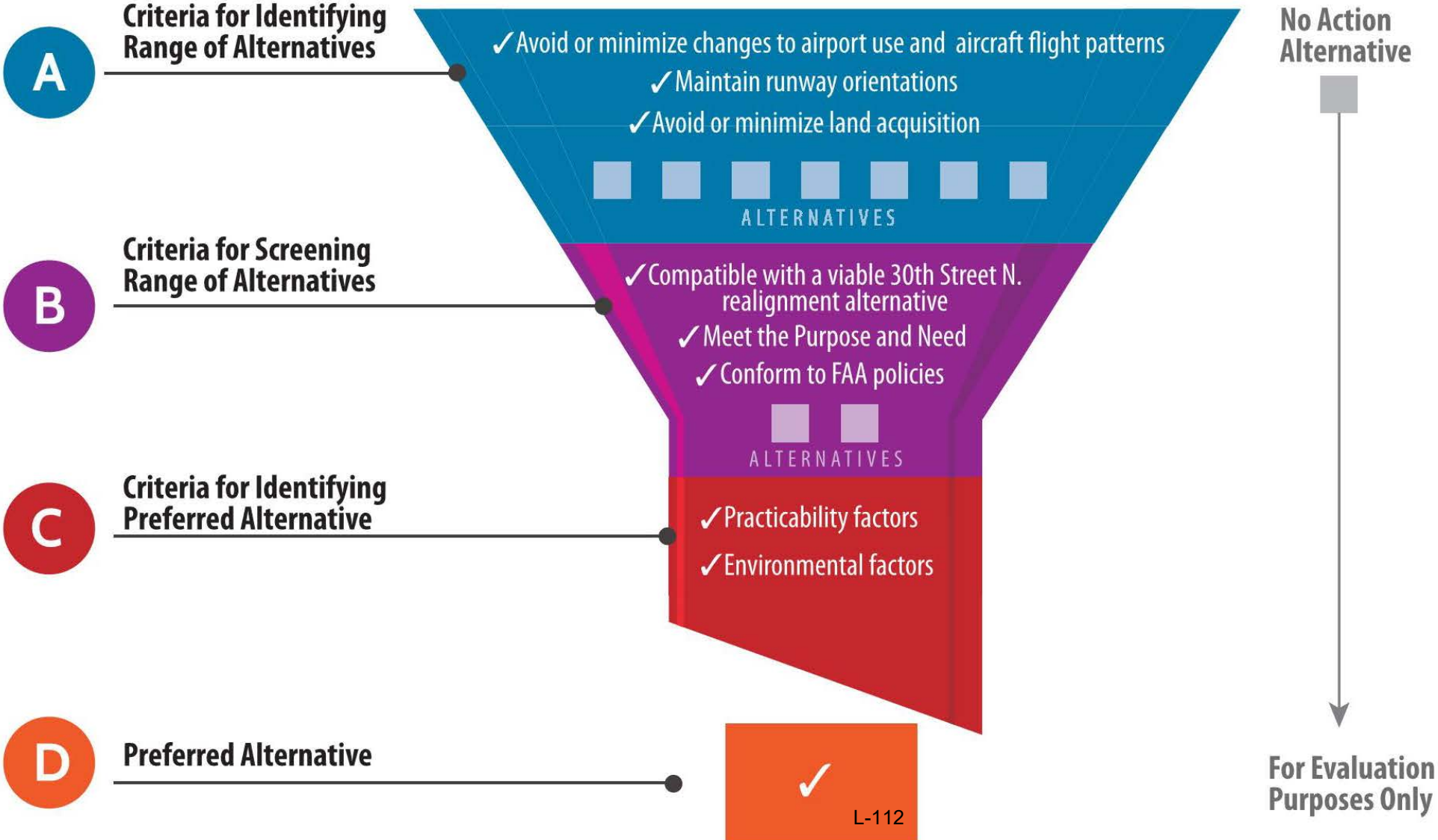
# No-Action Alternative

- Must be carried forward throughout the environmental review for comparison with the preferred alternative.
- Under this scenario, no improvements would be made beyond maintaining the existing airfield configuration.
- This alternative does not meet the Purpose & Need.





# Primary Runway 14/32 Alternatives Evaluation Process



# Primary Runway 14/32 Alternatives

- The LTCP considered five concepts.
- Supplemental planning identified three additional concepts.

Figure 5-1: Base Case Alternative Layout



Figure 5-2: Alternative A Layout



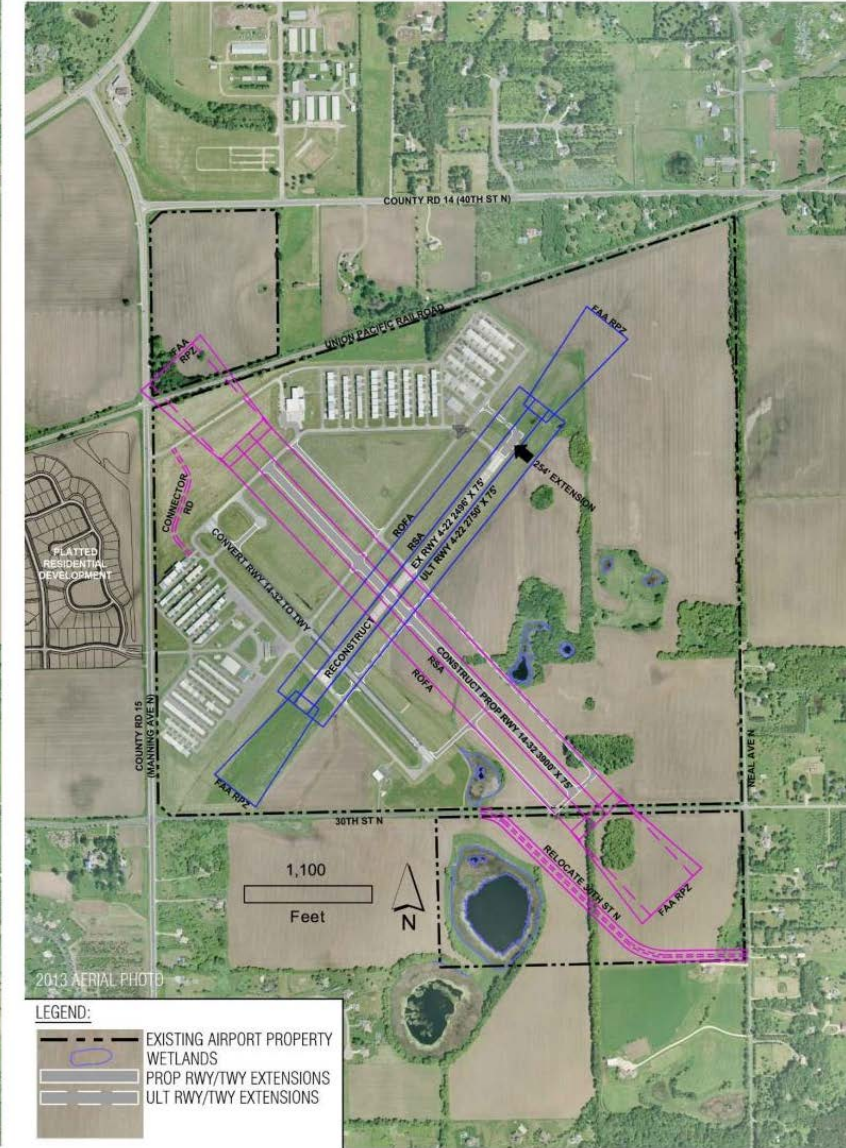
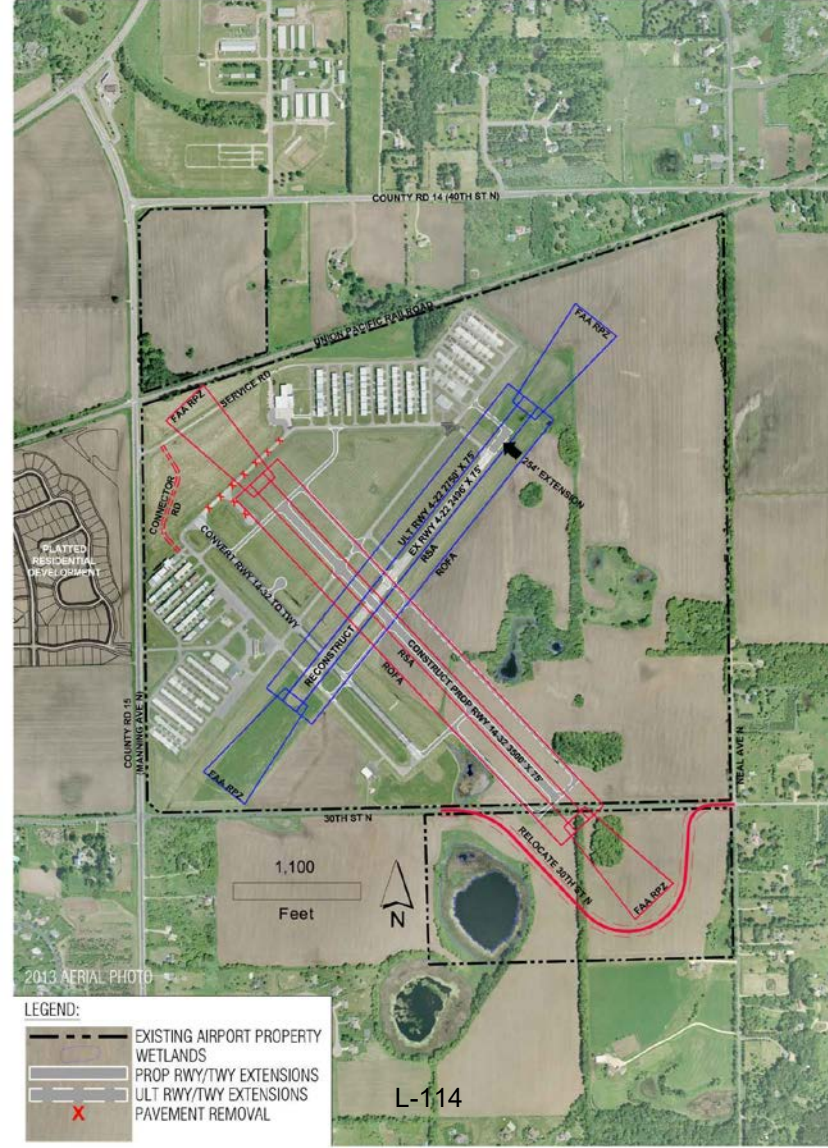
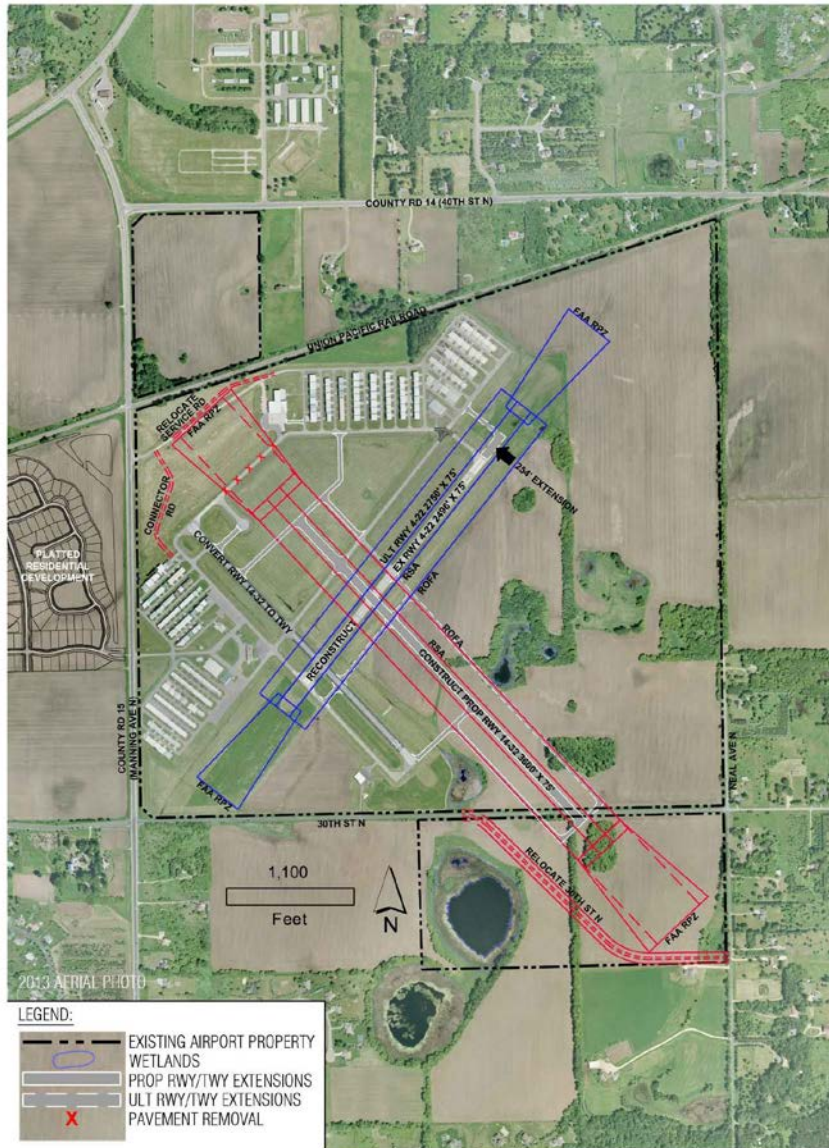


# Primary Runway 14/32 LTCP Alternatives

Figure 5-3: Alternative B Layout

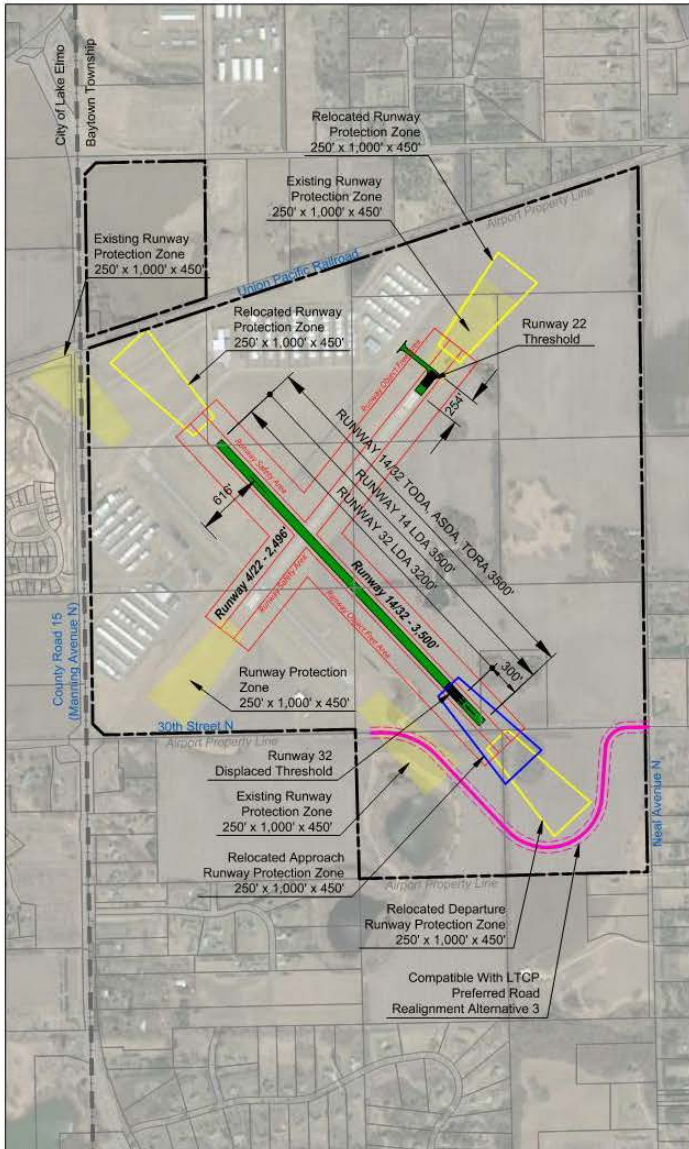
Figure ES-5: Alternative B1 (Final Preferred Alternative)

Figure 5-4: Alternative C Layout

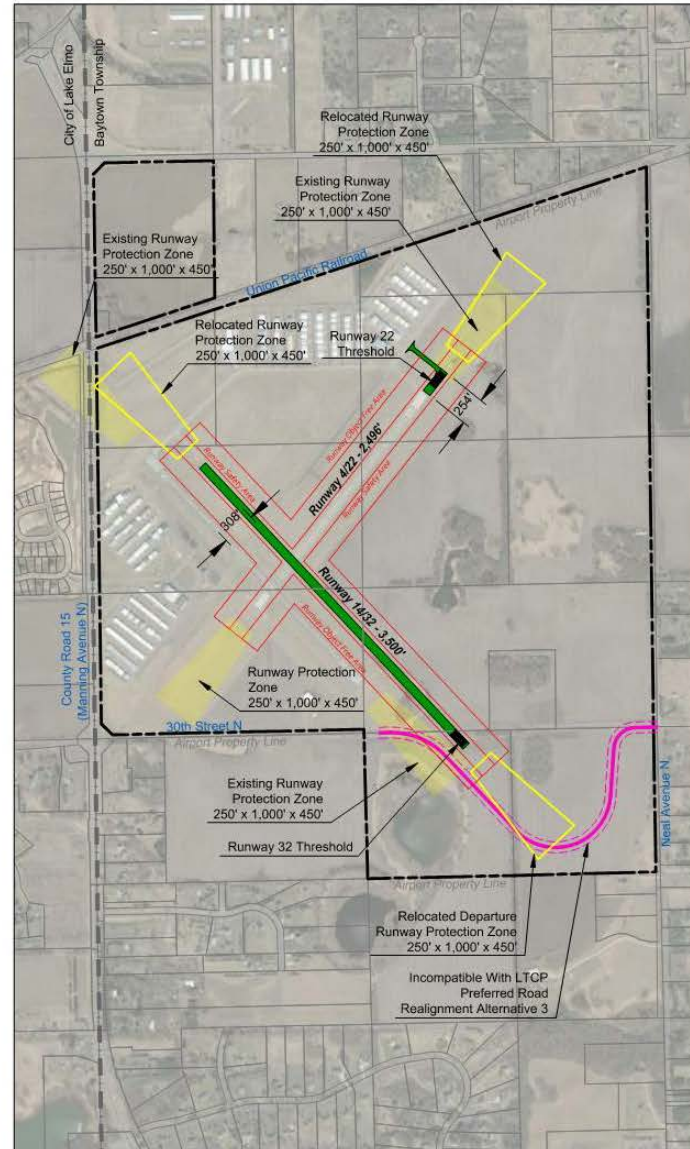




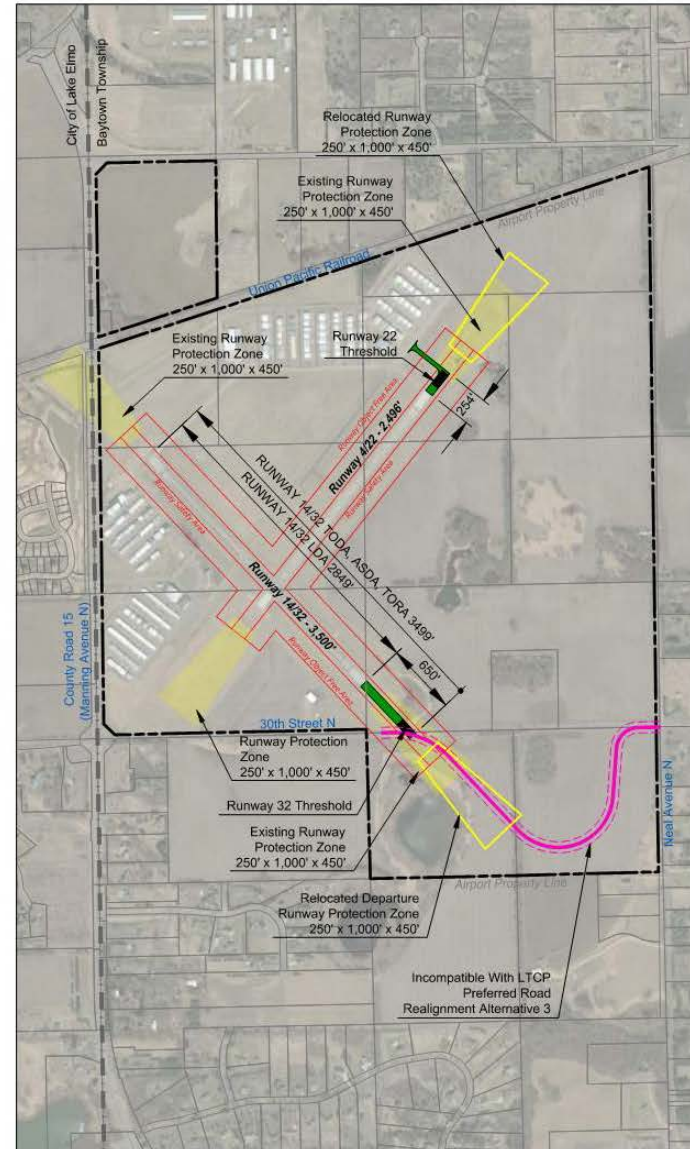
# Primary Runway 14/32 Supplemental Alternatives



Primary Runway Alternative B2



Primary Runway Alternative D L-115



Primary Runway Alternative E



# Primary Runway 14/32 Alternatives Screening

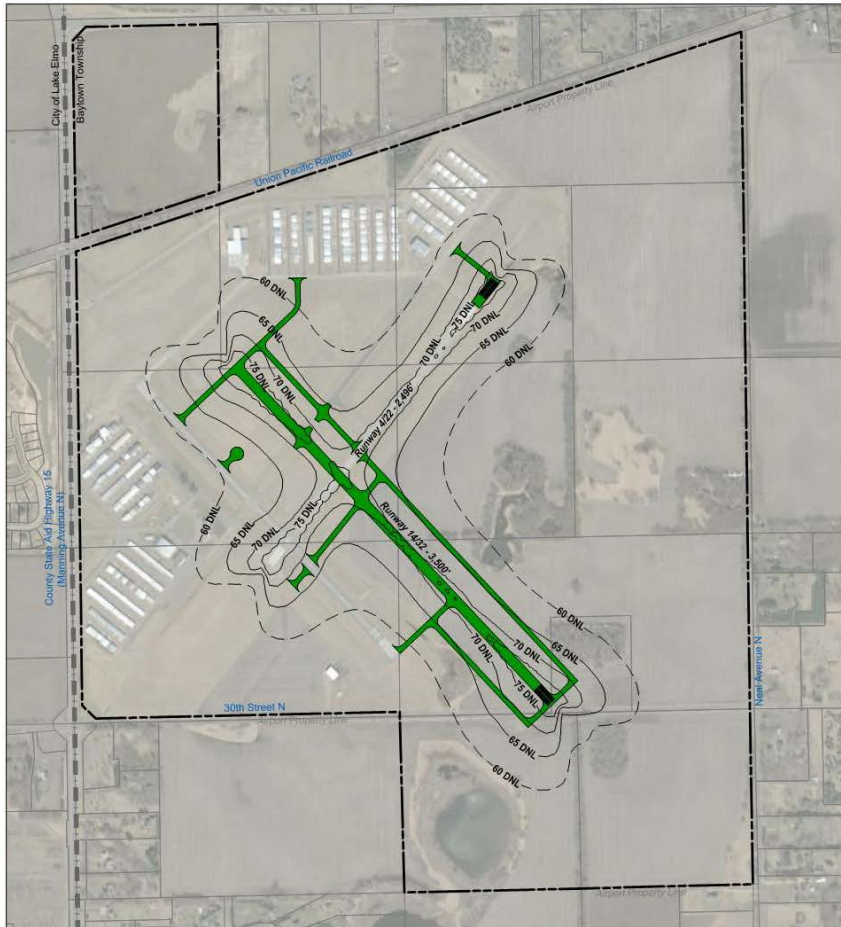
Table 3-1: Primary Runway Alternatives Screening

Alternative	Purpose & Need Objective 1	Purpose & Need Objective 2	Purpose & Need Objective 3	Purpose & Need Objective 4	Conform to FAA Policies	Viable 30th Street Realignment Alternative
	Improve the runway pavement condition	Minimize incompatible land uses in the RPZs	Meet runway length needs for existing users	Upgrade the instrument approach procedures		
No-Action Alternative	Yes	No	No	No	No	Yes
Alternative A	Yes	No	No	Yes	No	Yes
Alternative B	Yes	Yes	Yes	Yes	Yes	Yes
Alternative B1	Yes	Yes	Yes	Yes	Yes	Yes
Alternative B2	Yes	Yes	Yes	Yes	No	Yes
Alternative C	Yes	No	Yes	Yes	No	Yes
Alternative D	Yes	Yes	Yes	Yes	No	No
Alternative E	Yes	No	Yes	Yes	No	No

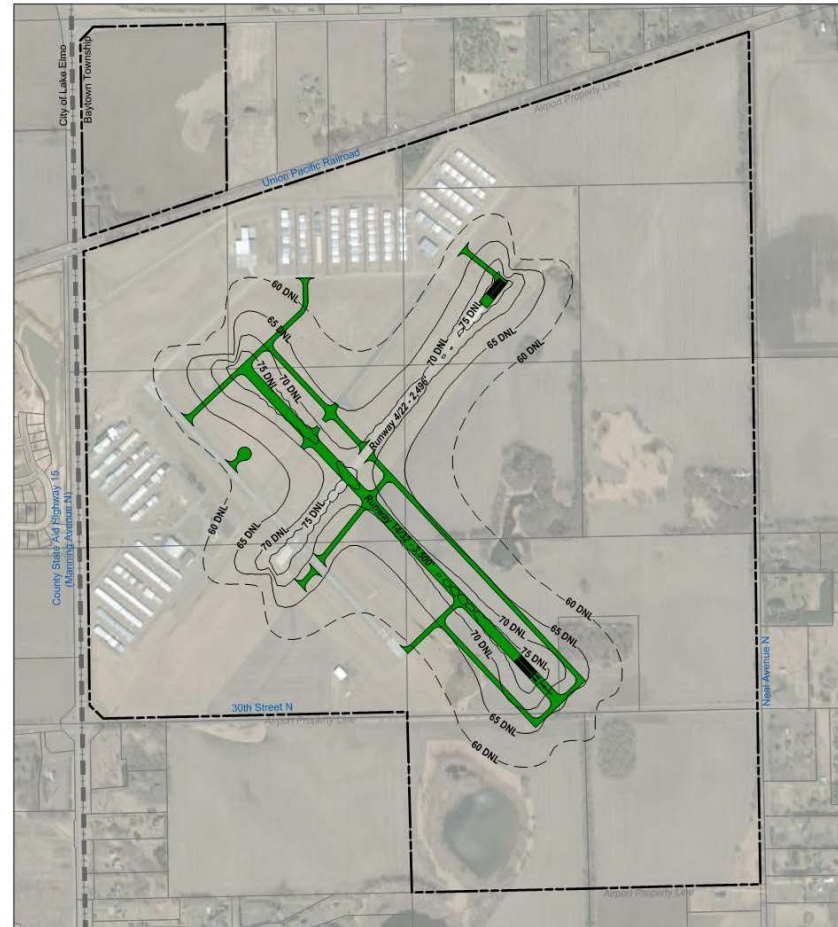




# FAA Policy for Implementing Displaced Thresholds



Alternative B1



Alternative B2

- The FAA considers the 65 DNL contour to be the threshold of significance for noise impact around airports.
- The 2025 60-DNL noise contour does not extend off airport property.
- AEDT DNL grid point analysis confirmed no change in DNL levels at the nearest residential area on extended runway centerline with a 300-foot displacement (less than 20-foot difference in altitude).
- Displacing the runway threshold as a noise mitigation tactic at Lake Elmo Airport is not consistent with FAA policy.

Note: 60 DNL shown for informational purposes only.



# MAC Ongoing Efforts to Reduce Noise



Lake Elmo Airport – K21D

**Noise Abatement Plan**

The voluntary Noise Abatement Plan for Lake Elmo Airport (21D) has been prepared in recognition of the need to make the airport and the surrounding community as environmentally compatible as possible.

**NOTE: FAA regulations and requirements take precedence over noise abatement procedures. RECOMMENDED PROCEDURES ARE NOT INTENDED TO CONFLICT WITH INSTRUCTIONS FROM ATC OR THOSE WHICH ARE THE EXCLUSIVE AUTHORITY OF THE FAA.**

**LAKE ELMO AIRPORT IS NOISE SENSITIVE**

**Avoid Noise Sensitive Residential Areas**  
Pilots are asked to operate with consideration for the residents located near Lake Elmo Airport (21D). Please avoid flying low and follow the established noise abatement procedures to help ensure a peaceful environment for everyone.

**Voluntary Nighttime Procedures In Effect**


1. Closed traffic pattern training operations are discouraged between the hours of 2400 local and 0700 local.
2. Intersection takeoffs are discouraged at all times. Intersection takeoffs between the hours of 2200 local and 0700 local are prohibited.
3. Any aircraft not meeting Federal Air Regulation Part 36 is prohibited between the hours of 2200 local and 0700 local.

**Preferred Runway Use**

1. When the winds are calm (less than 5 knots) the preferred runway shall be 32.
2. When wind, weather or traffic density do not dictate the runway to be used, the following priorities are recommended when selecting a runway:

**Piston Engine Aircraft or Turbo Prop Aircraft**  
Arrivals: 32, 14, 22, 4  
Departures: 32, 14, 4, 22

**Jet Aircraft**  
Arrivals/Departures: 32, 14




**AIRPORT DIAGRAM**  
LAKE ELMO, MINNESOTA  
LAKE ELMO AIRPORT (21D)



**K21D  
Pilot Guide**

**AIRPORT INFORMATION**

Field Elevation: 933  
TPA: 1933 (1000)

**RUNWAY INFORMATION**

<b>RWY 14 - 32</b>	2850 x 75
Asphalt, Single Wheel Weight 11,000 lbs.	
RWY 14: REIL, Runway Edge Lights, Left t/c; Road, trees.	
RWY 32: REIL, PAPI - 3.0° (on right), Left t/c; Road, trees.	
<b>RWY 4 - 22</b>	2497 x 75
Asphalt, Single Wheel Weight 13,000 lbs.	
RWY 4: Left t/c;	
RWY 22: Left t/c.	

**COMMUNICATIONS**

CTAF: 122.8  
UNICOM: 122.8  
WX AWOS-3: 120.075  
WX AWOS PHONE (651) 779-5949  
MINNEAPOLIS APP/DEP: 121.2  
CLEARANCE DELIVERY: 118.625

## Voluntary Noise Abatement Plan

- Preferred flight procedures
- Preferred runway use
- Designated maintenance run-up areas
- Nighttime training procedures

## Fly Neighborly signs

## Pilot Outreach and Resources

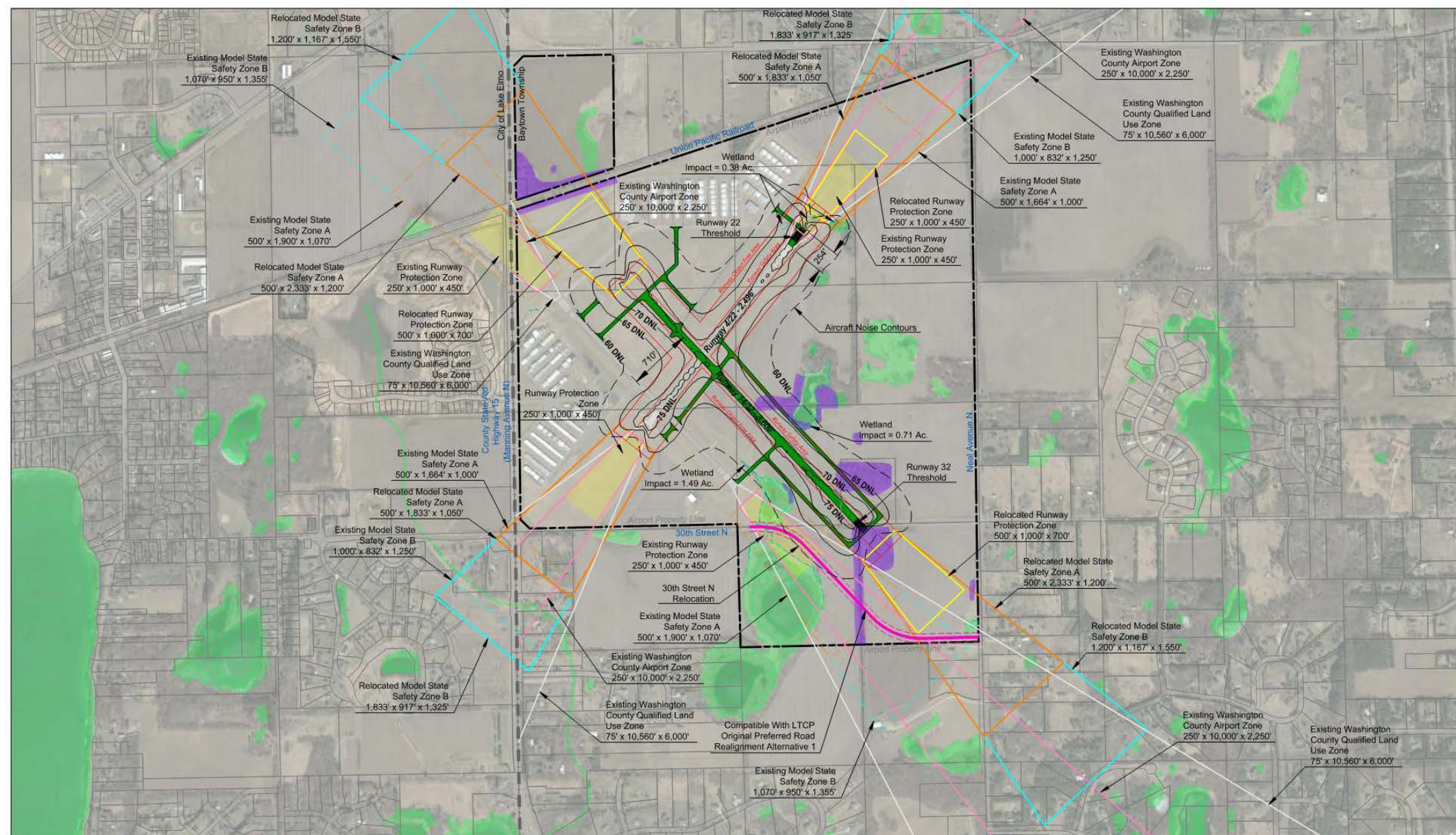
- Pilot Briefings
- Pilot Guides

## Pilot/Community Events

- Lake Elmo Airport Father's Day Pancake Breakfast
- Experimental Aircraft Association Chapter 54 events

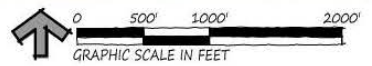






Note: Aircraft noise contour 60 DNL is shown for informational purposes only.

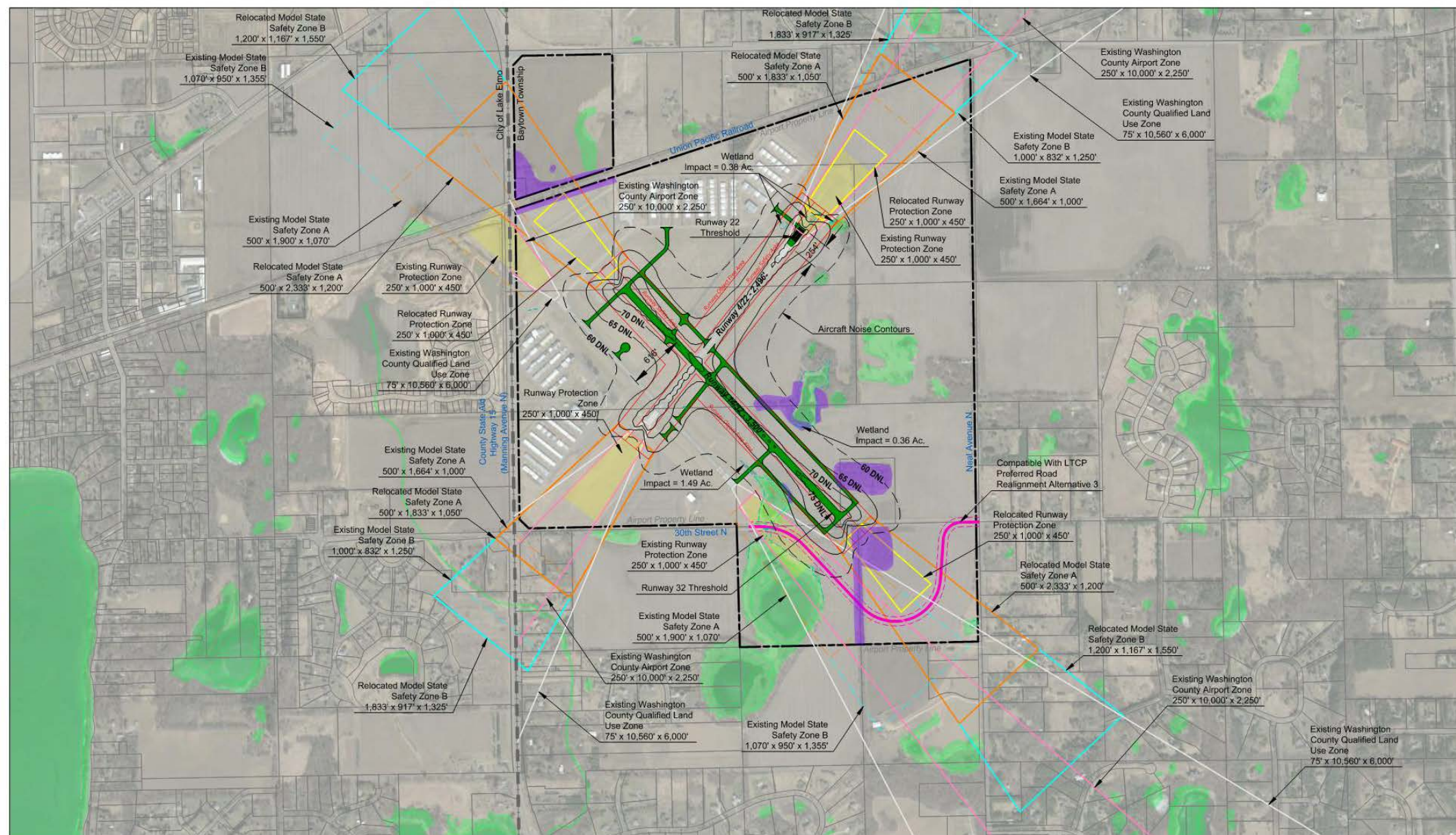
- Approximate Tree Removal
- Approximate Wetland Areas (U.S. Fish and Wildlife Service National Wetlands Inventory)
- Delineated Wetland Boundary



**Lake Elmo Airport  
Runway 14-32**

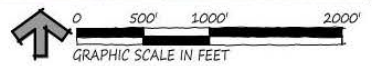
**FIGURE 3-8  
Alternative B**





Note: Aircraft noise contour 60 DNL is shown for informational purposes only.

- Approximate Tree Removal
- Approximate Wetland Areas (U.S. Fish and Wildlife Service National Wetlands Inventory)
- Delineated Wetland Boundary



**Lake Elmo Airport  
Runway 14-32**

L-120

**FIGURE 3-9  
Alternative B1**





# Primary Runway 14/32

## Comparison of Finalist Alternatives

Criterion		No-Action Alternative	Alternative B	Alternative B1
			Relocate 700' & Extend to 3,600'	Relocate 616' & Extend to 3,500'
<b>Practicability Factors</b>	Construction Cost	\$5.4 million	\$8.6 million	\$8.3 million
	Logistical Factors	Future Manning Avenue widening will trigger FAA RPZ review	30th Street N realignment options are limited	None
<b>Environmental Factors</b>	Wetland Fill Area (approx.)	NA	2.32 acres	1.85 acres
	Wildlife Considerations: RW 32 Threshold to Nearest Wetland (approx.)	400 feet	700 feet	700 feet
	Tree Clearing Area (approx.)	NA	22 acres	20 acres
	Residential Parcels with Structures in Model Safety Zone A	0	6	3
	Residential Parcels with Structures in Model Safety Zone B	2	9	10
	Private Properties within 65 DNL in 2025	None	None	None



# 30<sup>th</sup> Street North Realignment Alternatives

- The LTCP considered three concepts.
- Supplemental planning identified two additional concepts, which will not be considered further based on project cost and CEP input.
- Alternative 3 will be carried forward as the preferred alternative.



## **ALTERNATIVE 1**

- SPEED LIMIT: 45 mph
- COMPATIBLE WITH AIRFIELD ALTERNATIVE B (3,600')
- COMPATIBLE WITH AIRFIELD ALTERNATIVE C (3,900')
- ADDS 30TH ST N TRAFFIC TO A PORTION OF NEAL AVE N
- REQUIRES CONSTRUCTION OF ADDITIONAL INTERSECTION
- LOWEST COST ALTERNATIVE



## **ALTERNATIVE 2**

- SPEED LIMIT: 45 mph
- COMPATIBLE WITH AIRFIELD ALTERNATIVE B (3,600')
- COMPATIBLE WITH AIRFIELD ALTERNATIVE C (3,900')
- ADDS 30TH ST N TRAFFIC TO A PORTION OF NEAL AVE N
- REQUIRES CONSTRUCTION OF ADDITIONAL INTERSECTION
- HIGHEST COST ALTERNATIVE



## **ALTERNATIVE 3**

- SPEED LIMIT: 30 mph
- RESTRICTS AIRFIELD ALT. B RUNWAY LENGTH TO 3,150'
- RESTRICTS AIRFIELD ALT. C RUNWAY LENGTH TO 3,760'
- NO ADDITIONAL INTERSECTION REQUIRED
- MIDDLE COST ALTERNATIVE

# Crosswind Runway 04/22 Alternatives

- LTCP Preferred Alternative: Extend Runway 04/22 by 254 feet northeast
- There are no other alternatives that meet the same criteria used for identifying the range of primary runway alternatives



# Instrument Approach Alternatives

- LTCP Preferred Alternative: Upgrade Instrument Approaches
- There are no other alternatives that meet the Purpose & Need Objective #4

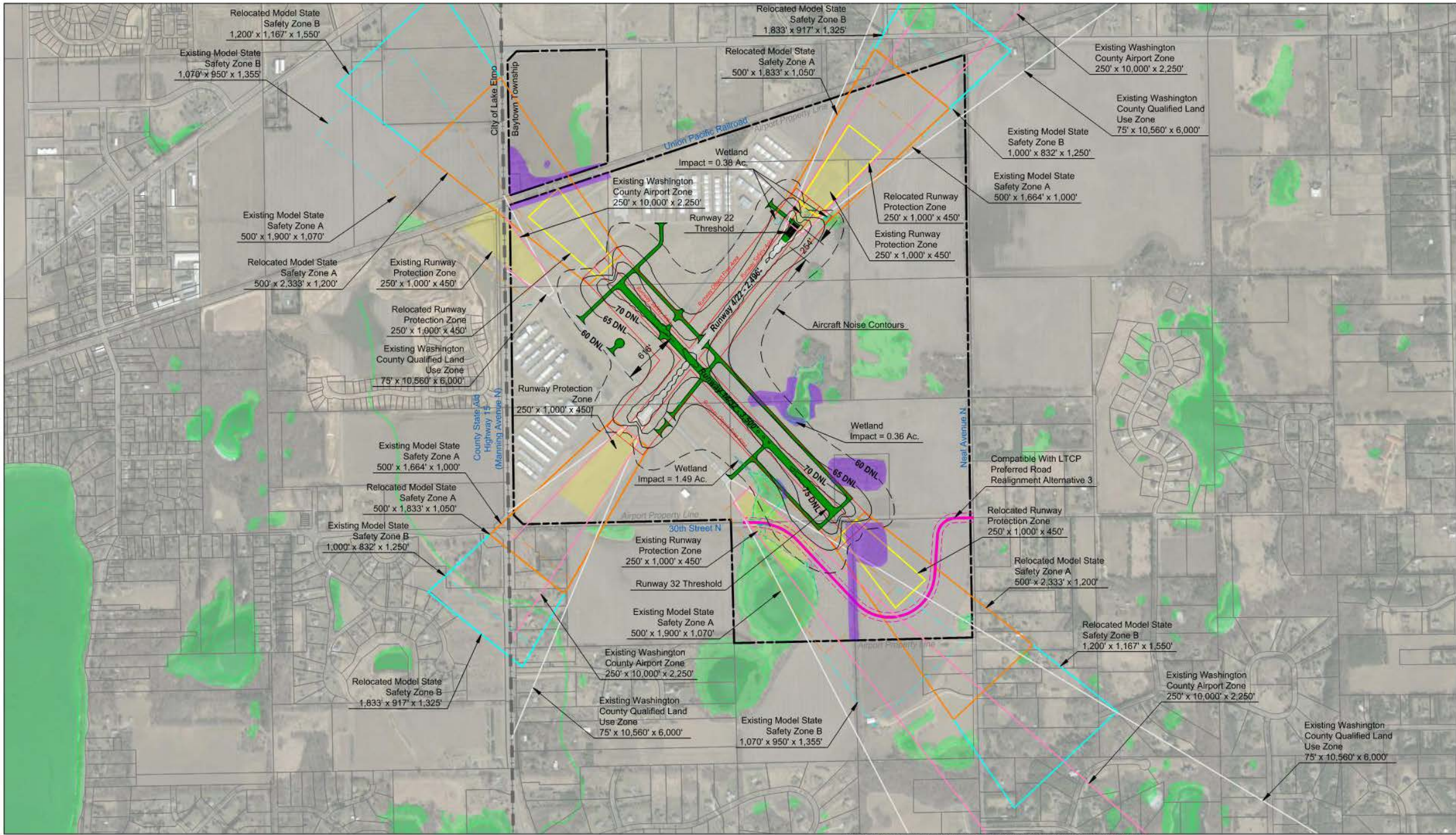




# Set of Preferred Alternatives

- Based on the preceding, the following alternatives will be carried forward as the preferred alternatives for full environmental review:
  - No-Action Alternative
  - Primary Runway 14/32 = Alternative B1
  - 30<sup>th</sup> Street North = Alternative 3
  - Crosswind Runway 04/22 = Extend Runway 04/22 by 254 feet northeast
  - Instrument Approaches = Upgrade Instrument Approaches

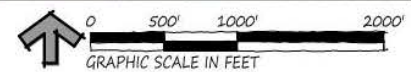




- Approximate Tree Removal
- Delineated Wetland Boundary
- Approximate Wetland Areas (U.S. Fish and Wildlife Service National Wetlands Inventory)

L-126

Note: Aircraft noise contour 60 DNL is shown for informational purposes only.





# Discussion/Questions

- CEP Meeting #4 to be held sometime the week of October 16
- Topics for the next meeting will include:
  - Debrief of second public event
  - Review full range of environmental impacts associated with the set of preferred alternatives



# Lake Elmo Airport Federal EA / State EAW Community Engagement Panel Meeting #4

October 19, 2017  
6:00 P.M.



## Agenda

1. Public Event #2 Debrief
2. Environmental Effects Overview
  - a. Air quality
  - b. Biological resources
  - c. Cultural resources
  - d. Farmlands
  - e. Hazardous materials & solid waste
  - f. Land use
  - g. Noise
  - h. Visual effects
  - i. Water resources
  - j. Cumulative impacts
  - k. Other NEPA categories
3. Next Steps
4. Panel Discussion
5. 10-Minute Comment Period  
*For guests making a comment, please state your name and address.*





**LAKE ELMO AIRPORT FEDERAL EA / STATE EAW**

# Community Engagement Panel

## Meeting #4 Minutes

Baytown Community Center

October 19, 2017

6:00 P.M.

### **Panel Attendees**

John Renwick  
Marlon Gunderson  
Mary Vierling  
Dave Schultz  
Kent Grandlienard  
Stephen Buckingham  
Keith Bergmann  
Ann Pung-Terwedo  
Chad Leque  
Neil Ralston  
Michael Madigan

### **Other Attendees**

Dana Nelson  
Joe Harris  
Gary Schmidt  
Patrick Hogan  
Brad Juffer  
Evan Barrett  
Colleen Bosold  
Todd Streeter

### **Public Observers**

Laura Kaschmitter  
Mick Kaschmitter  
Tom Vierling  
Pat Schultz  
Molly Olson

### **Representing**

Airport Tenant/User  
Airport Tenant/User and City of Lake Elmo Resident  
West Lakeland Township Resident  
West Lakeland Township Supervisor  
Baytown Township Supervisor  
Baytown Township Resident  
City of Lake Elmo Resident  
Washington County Public Works Planner  
Metropolitan Airports Commission Director of Environment  
Metropolitan Airports Commission Airport Planner  
MAC Commissioner District F

### **Representing**

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Mead & Hunt  
Mead & Hunt  
Community Collaboration

### **Resident of**

West Lakeland Township  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township  
West Lakeland Township

# Meeting Minutes

## **Absent Panel Members**

Emily Becker  
Robin Anthony

## **Representing**

City of Lake Elmo Planning Director  
Greater Stillwater Chamber of Commerce

*The attached report represents this writer's interpretation of items discussed during the meeting. Any corrections or additional information should be brought to our attention for clarification.*

## **The purpose of the meeting was to:**

- Conduct a debrief of the August 17<sup>th</sup> public event and get the Community Engagement Panel's (CEP's) feedback on what went well and what could be improved for future public events.
- Present the preliminary results of the environmental effects of the proposed development (preferred alternative) and get feedback from the CEP on the material presented to incorporate into the presentation for the upcoming November 6 public event.
- Continue to equip CEP members to be the point of contact for information sharing, both to and from the community and MAC, and to respond to inquiries from their constituent groups.

## **The presentation was as follows:**

A copy of this presentation can be found at: [metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-CEP-Meeting-Presentation-Slides-10-19-2017.aspx](http://metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-CEP-Meeting-Presentation-Slides-10-19-2017.aspx)

Dana Nelson, MAC Environment Department, opened the meeting by welcoming everyone and thanking Kent Grandlienard for allowing the group to use the Baytown Community Center for the CEP meeting. She then reviewed the agenda, saying that she would debrief the second public event, then turn it over to Evan Barrett, Mead & Hunt (MAC's consultant) Project Manager for the project, who would talk about the environmental effects overview. Evan noted that the team has set up the CEP meetings in a linear fashion to mirror the structure of the environmental review process, and walked through the topics covered so far (February – introduction to NEPA process; May – Purpose & Need and justification for the project; August – Alternatives). He stressed that tonight's meeting is focused on the environmental effects of the preferred alternative and the results of the analysis completed over the past several months. Dana then continued with the agenda overview, stating the project's next steps would be discussed next, followed by the Panel discussion and ending with the 10-minute public comment period.

Dana stated about 60 people showed up for the first public event and about 42 for the second. Community members from West Lakeland Township, Baytown Township and Lake Elmo comprised most of the attendees, with others coming from Stillwater, St. Paul, Pine Springs and other communities around the metro area. She noted that 18 written comments were received at the first public event, and only one at the second event. During the first public event, 37 people signed up for the project update email subscription list, with 17 additional signing up during the second event. She said that indicated there were likely new people at the second event that hadn't been at the first.

Dana showed a slide recapping the agenda for the August 17<sup>th</sup> meeting. She then talked about some of the new things tried at the second public event and asked the CEP for feedback on how they worked, noting input was desired as the team prepares for the next public event on November 6 at Oak-Land Middle School. The items mentioned were: new venue – Oak-Land Middle School; hard copy agendas and presentation slides – Dana had heard at the meeting that was helpful for people in following along; "Top Concerns" board to facilitate some feedback at the onset of the meeting to bring into the large group discussion and address the primary concern of attendees at that meeting; scrolling FAQ slide

## Meeting Minutes

about the project for the people that entered the auditorium early; facilitated presentation and Q&A; one-on-one engagement session/open house following group Q&A. Dana thanked all the CEP members who attended and helped out at the public event. She then asked for feedback as well as any tools or materials the CEP would like to see from the MAC to help with information-sharing with constituents, neighbors and community members.

Dana asked if the group liked the venue. The general consensus was favorable.

Mary Vierling asked if the format and presentation for the third event would be the same as the second. Dana said that was the plan. The doors will open at 6:00 with a presentation at 6:30. She said the Top Concerns board was not planned for the third event, but noted the plans haven't been finalized so nothing is set in stone, and reminded the CEP that was part of the purpose of these meetings, so the group can talk about how the previous public event went and what could be done to improve it. As there are still several weeks before the next one, she stated that things can still be adjusted.

Evan asked if the group thought the segmented format of the meeting was effective, noting that was the team's attempt to respond to previous comments from the CEP for having different opportunities for interaction. Ann Pung-Terwedo asked if they had a lot of people stick around for the one-on-one engagement session after the meeting. Evan responded that a lot of people stayed and asked questions. Ann confirmed that people got their questions answered? Evan said yes. Dana added that she knew at least one person arrived late and so they were able to talk with the project team to catch up on what they missed during that one-on-one time. John Renwick asked if the team learned anything at the one-on-ones? Evan replied that he had learned more about the concerns the community has and where they're coming from. He couldn't recall specifics but thought it was worthwhile to hear what people had to say and what questions they had. John said he was just wondering if any lightbulbs came on for anybody. Chad Leqve recalled that a lot of the questions went back to the justification and efficacy of the project. Stephen Buckingham noted that's nothing new and said we've been saying that for two years. Chad responded that he was just noting it was still part of the dialogue. To that point, Chad asked the CEP if they felt there was information that could be shared from discussions in the CEP meetings or things the project team could be doing differently to help better improve the public's understanding of the answer to that question. Stephen said don't ask me to help give more understanding because I don't know the answer to that question; I still don't think it's justified.

Chad noted one of the primary goals is to make sure the MAC is being transparent in these discussions, and is respecting people's positions, understanding they might not be able to change those positions, but are being as transparent and clear as can be in their communications. Chad mentioned the project team has had several individual meetings and discussions with some of the nearby property owners, including those who may be most impacted by some of the 30<sup>th</sup> Street realignment alternatives, as well as with Molly Olson [West Lakeland Township resident]. He said those have been helpful, and noted Molly brought up a good point about listening and making sure people are feeling heard and that they're being listened to. Chad reported this was a key takeaway for him from the meeting and expressed interest in any feedback in this area from the CEP.

Dana wrapped up the debrief discussion and invited the CEP to share any additional feedback they think of at any time with her via email or phone. She then turned the presentation over to Evan for the overview of environmental effects.

## Meeting Minutes

Evan then reminded the group of the funnel graphic depicting the alternatives evaluation process shown at the last CEP meeting and public meeting and recapped how the team arrived at a preferred alternative. He reminded the group of the no-action alternative (if the MAC were to maintain the current airfield configuration, with no upgrades, changes or expansion), which was located outside of the funnel as it does not meet the project's Purpose & Need.

Stephen Buckingham asked why the CEP was never given an opportunity to comment on the Purpose & Need in the first place. Evan replied that was the topic of the second CEP meeting in May. Stephen said no, you told us the Purpose & Need at that time; we were not given the chance to have input into that. Evan replied the project team will have a draft environmental document in early 2018 and there will be a public review and comment period, a public hearing, and another CEP meeting after that has been released. Stephen said, no, Evan, you've based this entire evaluation on the basis of the Purpose & Need, but the Purpose & Need were established before this group was ever put together and we never had a chance to comment on whether we felt that Purpose & Need were appropriate. Chad Leque stated that this group had a discussion about the Purpose & Need during the May CEP meeting. Kent Grandlienard said the discussions on the Purpose & Need started over two years ago. Dave Schultz said the Purpose & Need wasn't clarified or classified as such two years ago. Kent said, but we discussed the cost effectiveness and the money being spent. Stephen said, Evan has put out a set of purposes and needs and has said that any plan they come up with has to satisfy these purposes and needs and those have pretty well defined what has to be the result. Stephen further said that perhaps if we'd had community input into it, there might have been some other purposes and needs that would have been included. Kent said that we [Baytown] had input but there wasn't much response from the community. He reported that Baytown got one comment between five board members over a one-to-two-year period [noting that the one comment was from Stephen Buckingham's wife] and two comments in favor of it. He said Baytown didn't get much public comment, but West Lakeland did, and we had a meeting with the governor. Kent didn't know what more there was to say on the topic as he felt that there was opportunity for public comment. Stephen said he was talking about something different. You're talking about a generalized what should we be doing, but when we came into the first meeting of this panel, Evan presented a set of purposes and needs and said whatever we do has to satisfy these, and that was the first time we'd ever seen a specific list of criteria, and we had no opportunity to have input into what should be on that list of purposes and needs. Chad reassured Stephen that during the CEP meeting, when the Purpose & Need was discussed, if there would have been somebody that said we need to talk about these more, we need to have a discussion, the team and CEP would have had that discussion. Stephen asked, but did you suggest that we could do that? It was presented as though it was a done deal. Chad disagreed that was the case. Stephen reported that was the impression that he got at that CEP meeting. Dave added that his recollection was that it was a 2-hour meeting, and the project team took about 1 ¼ of it, leaving about 15 minutes at the end for discussion. He thought what would help is if the no action alternative was included in the Purpose & Need – to maintain the existing footprint as it is today.

Evan Barrett then noted that the MAC had a LTCP process where a lot of these same issues were discussed, and there was a generalized project that came out of that process – the preferred alternative – based on analysis of what the needs are at the airport. Dave Schultz said if you go back to 1966, your need back then was two parallel runways with two crosswind runways; if you'd done that back in 1966 we'd be sitting here today talking about right-sizing this airport and removing two runways, like you're doing at Crystal. Stephen Buckingham said you keep talking about the needs for the airport and you say



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you're taking into consideration the needs of the surrounding community but we don't hear anything about that. Evan said the presentation planned for tonight, which is on the environmental effects, is intended to provide transparency in terms of what this project means for this community, what it means for the resources in this community, for the environment and the community itself. That's what this process is all about. We've designed the stakeholder engagement process so we're talking to the community and providing information about what the effects of the project are, and that's what we're here for tonight. The foundation of the environmental assessment is the Purpose & Need, which grows out of the planning process. The planning process determines what those needs are, we took a fresh look at those needs that the MAC had identified and didn't find anything that was fundamentally changed or should be reconsidered, because the needs were based on real data and real facts. Stephen replied, no, they were based on some data, perhaps some facts, some opinions, but again, it's only taking into account aviation considerations; it's not taking into account the surrounding community. Chad Leque said, but that's part of what this process is intended to do. Stephen said, but the facility is part of the community. Chad said the environmental review process is structured to meet federal requirements to make sure that the MAC does a couple of different things through the decision process as to what the final action might be. The first is the Purpose & Need – why are we even contemplating changes to this facility? It's to provide safe, efficient and effective aviation facilities for the people that use it, which we've spelled out in the Purpose & Need. Then you look at all the different alternatives and options that we might be able to implement to meet that Purpose & Need. As we evaluate those, we have to look at all the environmental categories that Evan's going to talk about tonight and see if there are areas that meet a level of significance in terms of impact such that they need to be mitigated – either as a component of the project or as other actions. If there is, is there a way to meet that Purpose & Need without creating that impact in the first place. If you can't, and the impact is still there, and it's to a level of significance, then you have to mitigate it. That's what this process is intended to determine. One of the concerns early on was increased travel time on 30<sup>th</sup> Street. As we go through this process, clarity of issue is so important. Otherwise it's like bad information in equals bad product out. Really honing in on the issues from the community is imperative to make sure that community discussions are as productive as they can be. We go back to the travel time issue on 30<sup>th</sup> St. That was held up as a big concern, and that's why we did the extra work we did, had Evan's team look at if there were any alternatives that moved the needle in the right direction with travel time. We went through the exercise, and at the end of the day decided that the spot we're at is where we're going to stay. The other issue that came up last night with Molly Olson was noise. We're hearing that as a big concern for the community. As we go through this process, we will learn tonight from Evan what the noise impacts are based on the federal criteria and what we have in our toolbox that can help us address it. Realizing that, as an airport, we are heavily regulated, and the way we can use our funds is heavily regulated, sometimes can create a difficult dynamic, but it doesn't mean that there aren't things we shouldn't be doing to reduce that impact. We have a commitment to do that. Clarity of what the real issues are as we have this dialogue is so valuable so that we can do the best job we can to address them as best we can.

Stephen Buckingham said, I'll reiterate my point, and that is if you look at the Purpose & Need everything in there is oriented toward aviation, not to the surrounding community. There are a lot more people in the surrounding community than there are aviators using that airport. There are a lot more automobiles travelling on 30<sup>th</sup> Street every day, than there are aviation operations at the airport. And yet, there was no consideration of anything but the aviation considerations. I think one of the needs should have been no rerouting of 30<sup>th</sup> Street. But that was not considered. Evan Barrett explained that one of the criteria was that there had to be a viable 30<sup>th</sup> Street realignment alternative that minimizes

environmental impact – that criteria was considered. Stephen further stated, you didn't give us a chance to have input into that. Stephen then asked Evan what he considered his job in this to be, asking, is your job to do an independent environmental study to see what is best for the community or is it to justify what it is that Chad and Neil want to do? Evan replied that his job is to comply with federal and state regulations in terms of an environmental review of a project that the MAC has proposed, and to help them do it in a way that considers community input, and ultimately results in an environmental document that's based on fact, solid reasoning and a full consideration in the spirit of the National Environmental Policy Act. My intention here tonight is to present all the information we've collected on the environment that the airport exists within. We understand the airport exists within a complex community – West Lakeland Township, Baytown Township, and the City of Lake Elmo – but also in terms of the environmental resources. Stephen replied that from his perspective, it appears Evan considers his job to be to justify what it is the MAC has proposed doing.

Chad Leque asked Stephen what he would like us to do at this point. Stephen replied that personally he'd like to stop and go back to square one and let us have input into what the Purpose & Need for this airport redesign are. Mary Vierling said the Purpose & Need were never mentioned in the LTCP. Evan explained that in the LTCP process, it's referred to as Facility Requirements. There's a different set of terminology used in the planning process versus the NEPA process, but in a lot of ways it's the same thing. The Purpose & Need provides the basis for what comes out of the forecasts in the LTCP, interviews with people who operate at the airport. A lot of the product of the planning process was distilled into the Purpose & Need statement, but there wasn't a lot of new information there that hadn't already been made public. Neil Ralston said you'd find very close alignment between the goals and objectives that were set out to address in the LTCP and the Purpose & Need that was built for the environmental process.

Evan thanked Stephen for his comments and reminded the group that any public comments received during the comment period would be included in and responded to in the final environmental document. In the interest of time, he then proceeded with the presentation on the environmental effects. Neil added that he understands that the preferred alternative for many of the community members is to repave the runway as-is with no expansion, but pointed out the original concept of the plan was the original alternative with a 3,600-foot runway and a different realignment of 30<sup>th</sup> Street N. that we heard was particularly unpopular and of concern. We did adjust the plan based on community input. I understand it's not to the full extent of what some of the community wanted, but we tried to find closer to some middle ground on how do we address some of the biggest community concerns while still doing what we believe is in the best interest of the aviation facility that we are tasked to ensure its future prosperity. He said he understands we didn't go nearly as far as some would like, but struggles with the statement that there has been no community input.

Evan discussed the method for determining environmental effects. The project team uses the no-action alternative as the baseline for comparison with the preferred alternative – the difference between the two are the resulting environmental effects. He reminded the group that the no-action alternative does not meet the Purpose & Need identified as part of this environmental assessment but is still being considered throughout the document. He explained that the National Environmental Policy Act (NEPA) is an umbrella that requires federal agencies to consider the effects of their actions. There are several special purpose laws under the NEPA umbrella, such as the Clean Air Act or the National Historic Preservation Act. The FAA identifies significance thresholds and factors for the different NEPA categories to help determine if an effect (or impact) is considered significant.

Evan then went over the NEPA categories that were evaluated, how each was evaluated and the results of each area:

- Air Quality – minimal impacts during construction, but neither operational nor construction emissions would exceed the FAA thresholds
- Biological Resources –
  - Approximately 20 acres of on-airport trees will likely need to be removed to clear airspace surfaces associated with the new runway (unlikely FAA will determine this to be a significant impact).
  - Project team identified two federally-listed species (northern long-eared bat, a threatened species, and rusty patched bumblebee, an endangered species); northern long-eared bat may be present in the tree removal areas, so impacts will be avoided and minimized using US Fish & Wildlife/USDOT-recommended measures; the rusty patched bumblebee has documented habitat within 2 ½ miles of the airport, however there is no suitable habitat for this bee in the project impact area.
  - Project team identified a state-listed threatened species (Blanding’s turtle) that may be present in both wetland and upland areas, so impacts will be avoided and minimized using MnDNR-recommended measures.
  - With the avoidance and minimization efforts, there are no significant impacts per NEPA guidelines in this category.
- Cultural Resources –
  - Architectural history – Project team identified 13 historic age (50+ years) properties, but 12 were determined not to meet criteria of the National Register of Historic Places (NRHP). The railroad corridor may be eligible for the NRHP but is not affected by the project.
  - Archaeology – Project team identified two sites that may be eligible for NRHP, but they are not affected by the project. The FAA is also conducting nation-to-nation consultation with Native American Tribes as required for NEPA actions under federal law.
  - The FAA makes a determination of the effect based on these findings and sends it to the State Historic Preservation Office for concurrence. We anticipate they will make a determination of “no historic resources affected” in this category.
- Farmlands – approximately 43 acres of farmland would be converted permanently to aeronautical use; project team is consulting with US Department of Agriculture to determine significance of effects.
- Hazardous Materials & Solid Waste – project team identified 17 known hazardous materials sites within one mile of the Airport (on and surrounding), but none will be affected by the project. Groundwater contamination plume would not be affected due to water table depth.
- Land Use –
  - Residential – there will be minor changes to visual flight rules traffic pattern area (where aircraft circle when landing under visual flight rules conditions – this area extends about 1.2 miles off the end of each runway in all directions), but in terms of overall flight patterns over the area, there’s not a lot of difference. With the proposed development, there would be five houses in the current State Model Safety Zone A (typically prevents new structures), and 20 houses in the State’s Model Safety Zone B (typically imposes density restrictions, i.e., prohibiting small lot, high-density development or large

- congregations of people). However, the MAC will convene a Joint Airport Zoning Board (JAZB) in the near future consistent with Minnesota Statutes. What comes out of that process is unknown at this time, but the zones could look different than the State's model safety zones.
- Ground Transportation – design of realigned 30<sup>th</sup> Street N. can accommodate forecasted traffic volume and type; travel time will increase an average of 46 seconds in either direction; FAA will need to approve new road right-of-way because the road is on airport property.
  - Wildlife Attractants – no new wildlife attractants created by project; tree removal and agricultural lease reductions are expected to reduce wildlife attractants on the airport.
  - Ann Pung-Terwedo asked if it would be appropriate to talk about the Manning Avenue expansion in relationship to this expansion, that this project won't have any impact on the expansion of Manning Avenue? Evan replied that he would discuss this when he gets to the Cumulative Impacts slide, as the team is aware that the Manning Avenue expansion is planned for the reasonably foreseeable future.
- Noise – The threshold for significance of noise is a 65-decibel day night average sound level (DNL). The 65 DNL contour is entirely contained on airport property for both the 2025 no-action and preferred alternatives. This is based on detailed modeling of specific aircraft types, specific runway use percentages, day-night splits, a lot of different assumptions and analysis that go into developing these contours that are based on flight tracking data the MAC maintains and supplemented by our own observations. Because the 65 DNL is entirely on airport property, there is no significant impact that needs to be mitigated in terms of aircraft noise associated with the project.
  - Visual Effects – there will be lighting systems relocated and new lighting systems installed as part of the project. Evan showed and explained the three different types of lighting systems used on the airfield. Some of the lighting systems will move closer to the residential areas; however, lighting systems will only be fully operational (on and at full brightness) when activated by pilots. John Renwick stated some of these lighting systems are already on the runway today. Evan confirmed yes, on one or two of the runway ends (depending on the system in question), but the project is evaluating adding them to all four runway ends. He mentioned that the runway edge lighting is always on but set to low intensity and pilots can remotely activate those to be brighter when they need them. Keith Bergmann mentioned they are only on at night. Evan confirmed that was correct. The project will relocate and extend primary runway lighting systems, and will add these systems to the crosswind runway, which is currently unlit. Light screening benefits of trees along Neal Ave. are being evaluated. John Renwick said the runway edge lights are on all the time and asked if that was going to change. Evan responded that the facility directory lists them as set to low-intensity. Joe Harris confirmed the runway edge lights are on all the time at low-intensity. John stated there is currently no lighting on the crosswind runway and asked if it was really needed, then commented that he hesitates to ask the question. Evan replied that because that runway does not have any GPS approaches, at least runway edge lighting would be needed to get GPS approaches for the runway. To get the best possible approach procedures, the full lighting systems are typically needed for a full non-precision instrument runway (today it's a visual runway). John joked that there's one advantage to not having runway lights, as he's heard from flight instructors doing tailwheel training: they use the crosswind runway because the student isn't going to take out a runway light. Neil added



that another benefit to having a lit crosswind runway is that it can be used at night to balance out nighttime operations better, so that the ideal runway for any given wind and weather conditions can be used. Stephen Buckingham asked how many nighttime operations are there? Evan responded the team has estimated about 4 percent of operations are nighttime. There are also about 10 percent that take place during instrument flight rules conditions – when it’s really foggy or low ceilings where sometimes those lights would be keyed on because pilots need them to land. We’ve estimated about 15 percent of operations actually need the lights. The other 85 percent are flying in when it’s clear sky and they don’t need lights at all. Commissioner Madigan asked if the lights have been an issue for the neighbors? Have they been intrusive? Mary Vierling answered the strobes sometimes are intrusive. Dana asked whether Mary meant the airport beacon light (the white and green) or the strobes? Mary and Dave Schultz said the strobes. Dave clarified the white lights – the runway end identifier lights (REILs). Dave then asked if there could be an issue with the lights along Manning Ave. with triggering epileptic seizures with flashing lights and asked if there have been any studies done on that? Evan responded that was a good point but he didn’t know the answer to that question. Mary added that she has astigmatism and noted if she’s coming down Manning Ave. and if those strobes are on, she has to shield her peripheral view while driving. Dave noted it’s worse if you’re on 30<sup>th</sup> Street. Mary added they shoot right across the fields on 30<sup>th</sup> right into the homes. Commissioner Madigan asked if it was possible to screen that at all. Evan responded that’s what the team is exploring. Some of the trees identified for removal because they penetrate the airspace surfaces at the end of the runway, we are exploring to see if those trees could be left. The team is also looking at potential other mitigation efforts. Keith Bergmann asked whether the PAPIs and REILs are visible at ground level since they are angled up and aimed into the approach. Joe Harris said they are visible at ground level, but there are tolerance limits that affect where they might be seen from. Evan responded there are certain areas they’re aimed at but the light envelope is sufficiently large so you can see it on the ground. Same with the PAPIs – they’re aimed up but they’re not flashing like the REILs and typically aren’t as much of an issue. Ann Pung-Terwedo asked if the MAC could incorporate some berming or something with the topography to help shield the light effects? Evan responded, potentially. Neil Ralston said he’d be interested to see if there are some shielding options for REILs. He said he doesn’t know the answer to that but he’d be surprised if that issue hasn’t come up somewhere else before and wonders if someone else has found a better way to mitigate that. Evan offered there are fencing options too, depending on if the MAC could put a fence along 30<sup>th</sup> Street that isn’t an airspace issue, there might be a certain type of fence that also shields the light.

- Water Resources
  - Wetlands – from a regulatory perspective, wetlands are the primary impact associated with the project. About two acres of wetlands will be filled and those will need to be replaced elsewhere at a ratio of 2:1. Coordination is ongoing with the U.S. Army Corps of Engineers, Valley Branch Watershed District and other regulatory agencies for concurrence with boundary determination and jurisdictional determination. Expecting U.S. Army Corps of Engineers to take jurisdiction.
  - Surface Water – net increase of 550,000 square feet of impervious surface, meaning a lot more stormwater coming off the pavements and not infiltrating right where it lands. Structural controls and best management practices will be implemented to meet permit requirements from FAA, Minnesota Pollution Control Agency and Valley Branch

Watershed District. No anticipated significant impacts anticipated in this category that can't be mitigated.

- Cumulative Impacts – looks at things that have happened to date in the vicinity of the airport, things that are happening on and around the airport right now, and reasonably foreseeable development on and around the airport. When you add those all up with the proposed project, what is that incremental impact? That's what the cumulative impacts are. 1,720 parcels developed since 1964 within two miles of project. Continued urban development expected, along with Manning Ave. expansion from two to four lanes. Because wetlands are the primary impact from a regulatory standpoint associated with the project, the wetland impacts of the project will be compared with wetland impacts and permitted actions associated with past and reasonably foreseeable activity. This category is still being analyzed.
- Other NEPA Categories
  - Climate – limited potential for the preferred alternative to affect future climate conditions. There are some greenhouse gas emissions associated with this project but the Climate category does not have a hard significance threshold, so project team didn't do detailed greenhouse gas emissions analysis further than what was covered in the Air Quality category.
  - Coastal Resources – none present
  - DOT Section 4(f) – this category includes public recreational or cultural resources the DOT has considered to be significant, such as parks, wildlife refuges and historic sites, but none of these resources are present on or adjacent to the airport.
  - Natural Resources and Energy Supply – this category evaluates if there are adequate resources locally to construct and operate the project, such as fill material, asphalt, energy required to move airplanes and construction vehicles, etc. Demand won't exceed supply so there won't be an issue in terms of natural resources.
  - Socioeconomics – no expected shifts in population, public service demands or economic activity; no low-income or minority populations in the area adjacent to the airport; no potential disproportionate health or safety risks to children.
  - These five categories will be discussed in the document but there was no detailed analysis completed for them.

Evan then directed the CEP to the table in the back of the slideshow handout summarizing the environmental effects. The items in green are the categories for which the project team has definitively identified the effects/impacts AND any required permitting, mitigation and/or associated actions. He said that, going forward, the discussion will focus in on the items in white, as the analysis for those categories wraps up and it becomes clear what those impacts and associated actions will be.

Evan wrapped up the presentation with next steps:

- Public Event on November 6 – the presentation material will be similar to what was presented tonight
- Next two CEP meetings were planned for November and January, but based on the amount of material the team has to cover, they don't believe there's a need for two more meetings prior to the draft environmental document being published, so Evan proposed cancelling the November meeting and holding the next meeting in January. The CEP then compared schedules and settled on January 16<sup>th</sup> for their next meeting.

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- Early 2018 – publish draft EA/EAW for public review and comment

Dave Schultz asked what the timing is between publishing the draft EA/EAW and the public comment period close date. Evan said best practices are usually to put the draft document out for about 45 days, then have the public hearing about 30-days into the comment period, and have another 15 or so days for public comment.

Evan then opened up the meeting for CEP discussion.

### **The CEP discussion occurred as follows:**

Kent Grandlienard said he thought a JAZB already existed. He was on one 10+ years ago with a gentleman named John [from West Lakeland Township Board] and someone from Lake Elmo that met at the Lake Elmo City Hall. Neil verified that he was referring to a Joint Airport Zoning Board and Kent confirmed that's what it was. Neil said this was news to him but he would look into it. Kent said it was when Bridget [Rief, MAC staff] was in charge of that aspect. Kent said they put together a formal board. Ann Pung-Terwedo didn't recall formal establishment of the board or an official joint-powers agreement. Kent said they met for over two years, and thought Ann or one of her colleagues from Washington County was also involved. Ann said she didn't think it was a formal joint-powers board, but a more informal, regional board. Kent said he thought it was a formal board. Neil said he would check in with Bridget Rief to find out more. Neil said whether it's reconvening an existing JAZB or creating a new one, it will be a board with community representation as outlined in state statutes to develop a safety and land use zoning ordinance. Neil said he would go back and see if he could find any documentation. Kent said a lot of the same items were being discussed at the time, including the runway expansion, although a longer runway was being considered at that time, and although it was not the primary focus there was discussion of diverting some commercial and/or corporate traffic from MSP and St. Paul Downtown to some of the smaller relievers.

Ann Pung-Terwedo said regarding cultural resources, the County has historic resource policies in the context of the current Comprehensive Plan 2030 and offered to share them with Evan and the project team. Evan thanked her and invited anyone aware of any other local regulations that it doesn't appear the team has considered, to please let him know, so they can cover all the bases.

Kent said they were told by their attorney, Dave Magnuson, that when this process began a couple years ago that it didn't require formal town board approval from West Lakeland to do any of this, but that township approval would be required to abandon a segment of the road. He suggested the team might want to look into that. He said part of 30<sup>th</sup> has to be vacated. Neil clarified it's a prescriptive easement that has to be vacated. Kent said they were told that had to have town board approval. Evan asked if he said town board approval was required by both townships? Kent believed so, because they share the road right down the middle. Kent suggested the team look into what was required. Neil believed there have been discussions between the MAC's attorney and the township's attorney but he didn't know the exact details, but knows it was regarding vacating a prescriptive easement, as there's no right-of-way established for 30<sup>th</sup> Street.

Dave Schultz noted there was an article a few months back in the Minneapolis paper about Airlake and Lakeville that MAC would like Lakeville to annex the entire airport so they can provide sewer and water.

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In talking with the township supervisor down there for the township, his impression was there were behind-the-scenes discussions going on between the MAC and Lakeville. Dave asked whether those same types of discussions going on out here with Lake Elmo regarding annexation of the airport out of the township and into Lake Elmo. Gary Schmidt [MAC Director of Reliever Airports] stated there were no behind-the-scenes discussion between the MAC and the City of Lakeville trying to work out a deal. He explained what happened was the airport commission wants to provide sewer and water to the airport, which Eureka Township can't provide. The City of Lakeville does have sewer and water service. The MAC approached the City of Lakeville and asked if they would be willing to consider an annexation if the MAC petitioned the City. That was the extent of the discussion. From there, the MAC went directly to Eureka Township to try and work out an agreement. The MAC is about to petition Lakeville in the next 30 days to consider annexation.

Kent commented on that, saying it has long been a point of contention for Baytown Township and the City of Lake Elmo regarding discussions on airport sewer and water. They ended up not installing sewer/water along Manning and came down 17 instead. He said the Baytown town planner from TKDA is also the town planner for Eureka Township. He said they were told that Eureka Township and the City of Lakeville have a joint-powers agreement worked out like Baytown's joint-powers agreement with the City of Bayport to provide water because they're in the TCE contamination plume and they also have it for sewer for the St. Croix Prep School, and if that ever were to happen, those joint-powers agreements are an option without annexation. Gary said the MAC went down that road and Lakeville entertained the joint-powers agreement idea but Lakeville said the terms set by Eureka Township were not acceptable. Lakeville went back to the township and said if you're willing to revise the terms, we're willing to consider the joint-powers agreement, but Eureka Township would not change the terms. Neil added that there are no active negotiations right now to annex Lake Elmo Airport into the City of Lake Elmo. He said that Airlake is a unique situation because there is a hangar development area that people are interested in building if there were sewer and water, otherwise they're going elsewhere so there's a specific need there. He stated that is not the situation at Lake Elmo Airport. Dave Schultz added it looks like the FBO at Airlake is in Lakeville but most of the hangars are in the township. Neil confirmed that was correct due to a previous annexation.

Upon no further comments from the Panel at the time, Evan opened up the public comment period, stating the CEP could hold further discussion following the public comment period, if needed.

### **The public comment period occurred as follows:**

Molly Olson stated the information comes at us like a firehose. She suggested there's got to be a better way – perhaps taking questions throughout the presentation? She said back to Mr. Buckingham's question about the impact on the community, she keeps hearing that the MAC is engaging the public, but stated what she's seeing is the MAC just giving information and then defending its position and said that's not what real engagement and real listening is all about. She asked where are the people, where are the residents, where is the community in all these slides? They're clearly absent and have been in every single presentation. She said what she's learned from one of the previous presentations is that the community and people are not part of your requirements and you really don't care about the community; you really only care about the things that are required by state and federal law to look at. Yes, you've said you've done some tweaking here and there, but how much are you listening? She suggested for the next public meeting that it would help demonstrate some human concern to put up a



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slide of the comments and concerns the MAC has heard from the community to help the public feel heard. She noted hearing slides about bats and turtles but nothing about the impact on property values and 30<sup>th</sup> Street. She stated noise is a big concern – her number one concern – but there are a lot of other concerns, too, and noted the community has a long list of concerns. She said it was insulting at the last public meeting to be given a sticker and told to choose only one top concern. And now, those things are off the table for further discussion. She mentioned some of the concerns that should be on that slide are quality of life, safety and many others that she and others in the room could help put together.

Molly Olson also said that the Easton Village residents across the street from the airport haven't even been told about the airport development. Kent Grandlienard said yes they have; that's absolutely not true. Molly said that's not what they're hearing from the residents when they're buying the properties. She then asked Evan to go back to the slide showing all the new development around the airport since the 1960s and said she didn't see Easton Village on there. She noted she's not part of Easton Village but she cares about all her neighbors. Evan said it was based on County GIS data indicating when the parcels/lots were recorded, and that area in question has been subdivided since this data was compiled. Kent said every adjoining community is allowed to make public comment to the City. From Baytown's perspective, on every single development along Manning Ave. in Lake Elmo, we've made it clear in our public comments that residents need to be aware about potential airport expansion, Manning Ave. four-lane expansion, and the trains, railroad whistles and train tracks. He said they call it "planes, trains and automobiles" and they've made that very clear in every comment to the City of Lake Elmo. If the developer or City isn't sharing that with the residents, aside from them looking at the airport or the train tracks when they go out to potentially purchase a house, then that's on Lake Elmo – not on the airport or MAC. Molly said, "Isn't it convenient to defer that responsibility to somebody else – people that are probably not even in this room – it just tells me that there is no cumulative care about the cumulative community." Kent said that Lake Elmo should be caring about the residents of their city. Molly agreed, but said is there no responsibility for anyone else in this room? Kent reiterated that Baytown gave comments. He wasn't sure what West Lakeland did, but they know that as soon as all those houses are built, that Kent's phone is going to ring. He gave the example when they built Inspiration in Bayport, which used to be in Baytown, he had people screaming at him over the phone because the train whistles were keeping them awake at night, and they were told when they bought their houses that those tracks weren't used anymore. Kent told those people they were seriously misinformed. Those are the kinds of things that happen in developments that come up against airports, railroad tracks and now Manning Ave. – and they're all going to complain about busy traffic and there will be stoplights that don't exist today, and the train tracks are heavily used. He said he didn't know what the solution is. He suspects that West Lakeland probably made similar comments. Dave Schultz noted he thinks there's a loophole in this situation, where realtors are required by law to disclose this information, but he thinks the sales are being made by a developer or builder and they're not required under the same statute to disclose some of this stuff. He said they've had two people come from Easton Village say they were not aware this was going on, and noted this has been going on for many years. Stephen Buckingham said that for all he's said against the MAC tonight, he's not blaming this one on them, but there was one person from Easton Village who was told the airport may be expanding or there's a possibility of an expansion at some point in the future but was not told there were active discussions going on concerning it. Kent said, well they were lied to. Stephen agreed and said it was the developer. Kent said, "Some of it is buyer beware." Chad Leque weighed in saying there is responsibility on all sides of the table on an issue like this. He said he's not shrugging responsibility, but the MAC doesn't control the land use decisions around the airport,

## Meeting Minutes

and that Neil Ralston is the person at the MAC that reviews those plans and comments on them, and he touches on things like airspace zoning, noise and things like you're talking about, and trying to convince the people who do have the authority to invoke some of the requirements. He said the MAC views its responsibility as trying to empower people to have the information available. For instance, he said if they know they're moving in next to an airport, if they were to contact the airport, they would be directed to all the information the MAC has publicly available on their website for people to do evaluations of different properties around the airport. He said that in the hypothetical situation of a city that does not provide the information and disclosures they're required to provide, the MAC still wants the plans for their airports out there and accessible to the general public so people are empowered to do their due diligence if they're so inclined. He stated the MAC provides this information for existing operations and for what's planned. He referenced a woman at the last public meeting who was concerned about the airport as it exists today, who just moved into a neighborhood near the airport. He noted her expectations of moving in across from an airport did not align with reality and she was quite frustrated. He said that's unfortunate to hear, but Kent's comment about responsibility resonates and he thinks that responsibility goes all the way around the table. He commented that everybody has a different influence and ability to do some of the specific things Molly is talking about as far as real estate transactions, noting that the MAC can comment and try to convince the city to do what they're supposed to do, but the MAC doesn't have the authority over those disclosures, and he suspected it was the same with the townships. Kent agreed it's the responsibility of the realtors, the buyer and the communities. Kent gave an example of the TCE (groundwater contamination), he said they had to fight the real estate lobby to get a requirement that when someone purchases a piece of land in Baytown within a Special Well Construction Area, that they be made aware of that groundwater contamination (it's a Superfund site) and the County agreed to put it on their deeds. But before that, the real estate lobby fought that, so people were building half a million or million-dollar houses and the last thing that goes in is the well, and they're finding out they're drilling the well into a contaminated aquifer with trichloroethylene (TCE) and carbon tetrachloride. And they'd say, well my realtor never mentioned it. He said, we couldn't get them to require that as a disclosure on land before the house was built, and then the County came through and it's required as part of the deed now, and West Lakeland has the same ordinance. Chad noted the MAC has dealt with this same thing at MSP when they opened up Runway 17/35, an 8,000-foot runway, in 2005. He noted the whole south metro area (Eagan, Bloomington, Apple Valley) for all intents and purposes didn't know they had an airport north of them, and we took about 37% of the departures from MSP and put them on that runway going south and it was a similar thing. We tried to get out to the realtors to let them know about this.

Molly Olson empathized with the road blocks lobbyists create, but said her main point is the MAC needs a slide that acknowledges they're aware of the concerns of the community. She said initially she stated Easton Village people are not being told and she understands now that should maybe be rephrased to say Easton Village people are not getting the message that this expansion is in full force. She offered she could help create that laundry list of concerns if the MAC had difficulty creating it.

Marlon Gunderson suggested that the Easton Village residents may end up better off with the runway moving further away from them. Kent offered that they're not going to like the beacon. Marlon asked if that was moving. Neil asked if he meant the runway end identification lights? Kent said no, the beacon. Neil confirmed the beacon would not be relocated. Kent mused they wouldn't like it as it would shine right in their windows. Neil said that's an existing condition at the airport today.

## Meeting Minutes

Dave Schultz said to Lake Elmo's benefit, they fought that and lost at the Supreme Court to the Metropolitan Council. He noted development has been forced on Lake Elmo. They look at where do you have a seller of open land. Stephen Buckingham noted it went to the Supreme Court twice. Molly Olson agreed that they fought the huge bureaucracy of the Met Council. Dave said if it wasn't because of that, we wouldn't be talking about Easton Village today.

Pat Schultz asked, regarding 30<sup>th</sup> Street, what number was being used to determine the traffic count and the forecasts and who are you going through? She noted that a car condo came into the township and they were using state numbers for what the count was on that road, and those numbers were significantly less than the study actually performed on that road, so it would be interesting to know which numbers the MAC used. She advised the team to be aware that there are numbers out there that are not accurate. Dave Schultz said this was the Chanhassen AutoPlex that was looking to place a facility like that south of 30<sup>th</sup> Street and they were using MnDOT numbers that accounted for 225 cars a day on 30<sup>th</sup> Street, and noted that is way low. He said Washington County did a traffic study that showed 1,500 cars a day on our side of 30<sup>th</sup> and over 100 an hour at rush hour (between 4:00 and 6:00 p.m.). Neil said they used the County's data from Manning, which was in the 1,300-1,400 range in 2010, growing to 2,000 by 2030, and 1,500 cars in 2017 fits in that curve very well. Neil confirmed that data was for a 3-day period and the 1,500 was the average of that period? Dave confirmed that was correct. Stephen asked Dave if when he said "our side" he meant eastbound only on 30<sup>th</sup> Street? Dave said that was eastbound and westbound on the east side of Manning. Neil reiterated the team used the County's data. Kent Grandlienard explained that the Met Council counts residences of people impacted by that road, so that if one person takes 25 trips back and forth on that road during a day, they're not counted 25 times. Dave noted the Washington County study was done during the summer months, when school was not in session, so he wasn't sure how that skewed the numbers.

Marlon Gunderson noted the team received a lot of criticism tonight and he wanted to state he thought the team was doing a great job and he appreciated the effort. As far as the Purpose & Need goes, he said it seems like, and noted maybe he was oversimplifying it, that the only Purpose & Need is to get the airport into federal compliance, and they've gotten away without having to do it for many years, because the runway has been fine, but now it's at the end of its life, and so now you have to bring it into compliance or you won't get your funding. Is the Purpose & Need anymore complicated than that? I'm not sure how you could take public input and change that Purpose & Need. Evan responded there are components of the Purpose & Need that are based on FAA standards in terms of the runway protection zones. If you are going to reconstruct a runway, and you can construct it in a location that has clear runway protection zones, the FAA is going to pursue that option, due to the size of the investment of constructing a brand new runway. The runway length is based both on FAA guidance and the needs of the types of aircraft using the airport. When we talk about the Purpose & Need, there's pieces of it that are based on FAA standards, but the standards function in the context of what makes the most sense for the airport long-term. That's what the LTCP determined was the right long-term plan to not only comply with standards but also invest the public money in a way that makes sense long-term. Chad Leque pointed out that previous plans had the proposed runway as long as 3,900 feet, with the original preferred alternative in the LTCP previously 3,600 feet, and noted that over time there have been changes to what's proposed at the airport to meet the needs of the operators, while balancing the concerns of the community, most recently going from 3,600 feet to 3,500 feet. Chad also looked up the May 25<sup>th</sup> CEP meeting minutes and noted there was a detailed discussion on the Purpose & Need. Stephen replied that there was a big discussion but you didn't give us a chance to have any input. It was

## Meeting Minutes

presented as this is the Purpose & Need. Chad said he thought it was more of a discussion like we've had tonight. Marlon asked what there was to discuss if the Purpose & Need is to bring the airport into compliance, and asked Stephen if he was saying the MAC shouldn't? Stephen said he thinks the Purpose & Need should take into account not only aviation interests, but also the concerns of the surrounding community. Marlon suggested Stephen was confusing the Purpose & Need with the plan. Stephen said no. Marlon said if you try to address that, you're boxed in with what property do I own, how am I going to meet that Purpose & Need – there are a lot of ways to do that with messing around with the variables and they've been doing that for a couple years now, but you've never changed the Purpose & Need at all. The Purpose & Need is very simple: FAA compliance. And enhancing safety. Mary asked Marlon what's your definition of FAA compliance? Marlon replied runway protection zones that don't cross roads – it's as simple as that. Dave Schultz stated the roads were here before the airport and runway were here.

Commissioner Madigan said the issue the MAC has is we're trying to balance conflicting interests. One interest is increasing the margin of safety for the pilots operating at the airport. I think that's an interest we all support and acknowledge. Second interest is minimizing the impact of the operation of the airport on the neighbors and accommodating their interests to the extent that we can. The third interest is increasing the efficiency and functionality of the airport, because that is something the MAC is charged with doing. We'll probably never have agreement on how we balance those interests, but that is what this process is all about – it's trying to balance those interests and minimizing the impact to the neighbors to the extent we can. Stephen said that goes back to the point a lot of us have made: you're increasing the safety of the airport – that's probably true – but you're decreasing the safety of ground traffic on 30<sup>th</sup> Street for a lot more users. The people who have airplanes at that airport knew the length of the runway when they moved in – they knew what they were getting. They could have put their airplane somewhere else but they chose to put it at that airport. We're not saying shut down the airport or make it less safe than it is; we're saying keep it the same so we can keep 30<sup>th</sup> Street the same. Commissioner Madigan acknowledged Stephen's argument and said you're balancing it a certain way, but I'm just talking about what the process is.

Marlon pointed out that these expansion plans have been in place at the airport since the 1960s. Kent said you have to acknowledge that part is true. Stephen said the 1964 plan was based on projections that have not happened. Kent said, I know, but the airport owned that property. He said he heard a woman once say, when they were at a meeting at the governor's office, "well how would I know that the airport owned that property on the south side of the road?" Kent said, you'd look at a plat map. Kent further said this parallel quandary we're in about trying to talk about the environmental impact and the airport expansion is a whole other issue as far as he's concerned that needs to continue to be waged on a different level, but it's confounding the purpose of this committee as far as the environmental impact part of it. He said, if people want to continue to advocate with their legislators or whoever that the expansion isn't necessary, that's a different avenue, but he doesn't think that was supposed to be the intent of this committee. He noted it seems like every meeting, that's all we talk about – "should the expansion be allowed?" and whether you agree with it or not that's really not the purpose of this environmental impact committee, right? Evan Barrett responded the purpose of the committee is stakeholder outreach, education, and making sure the MAC is transparent in what the plans are and what the environmental impacts of the plans are. Purpose & Need was one of the topics of one of the meetings; Alternatives was the topic of one of the meetings; and that's all wrapped up in this question of "Is the project needed?" Evan said he thinks the purpose of the committee is dependent



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on what the committee feels the purpose of the committee should be. Kent noted the long-term comprehensive plan has gone on before this as part of the whole argument either for or against expansion. Stephen said the name of this committee is community engagement panel and noted he didn't hear anything about environmental in that. He said he thought this was to get input from the surrounding community into what was going on with the expansion plans. Kent noted the committee was specific to the EA/EAW. Chad Leqve said it serves both purposes and that Commissioner Madigan stated it well. He said if people have concerns, that's what we want to talk about. He said it's a balancing act and he doesn't know that we'll ever be able to balance them in a way where everyone around the table says, "I love it; looks great." But at a minimum, we can have a dialogue to get to the best spot that we can get. He said that's what the MAC is trying to do in this process. He acknowledged that involvement on the CEP doesn't guarantee that we're not going to hear comments and objections from some of the CEP at the end of this when we take public comments, but it's important that we have the exchange, share information and try to work together to get the best scenario as part of this process. He said he doesn't know that it's reasonable to expect that any discussion like this, when there are concerns and views that are polar in some circumstances, is going to result in everyone being happy at the end. At a minimum, the MAC wants to make sure people have the information, that peoples' thoughts and ideas are considered, and to the degree possible, that the team can try and do something to address those, like the additional work done on 30<sup>th</sup> Street or the noise concerns. Chad mentioned there are some things the MAC would like to look at with the pilot community and the noise abatement plan and continuing relationships with the tenants at the airport while working together with the community residents to have that dialogue – and noted these are good things that come out of these processes. He acknowledged Stephen's concerns but said in fairness to the group and the dialogue that the CEP has talked about it, but that's not to say that everyone agreed or was happy about it, but there's value in the dialogue.

Mick Kaschmitter said the frustrating thing about this whole thing is why does the airport trump the community? Chad offered his thoughts on the MAC's legislative charge to maintain transportation assets to provide a certain level of safety and utility. The MAC comes to the dialogue with this responsibility. That's not to say that the aviation community and the airport are the only people that we consider in the process. Of course we consider the communities, but when we have our legislative responsibility, it's very difficult to give everything to both sides of the discussion and to make everybody happy. For instance, he noted that initially the runway length was proposed to 3,900 feet, which was great for the aviation community, but then it was reduced to 3,600 feet, and now we're at 3,500 feet. He noted there's a little movement there, but he knows that doesn't satisfy some of the community concerns. He noted, however, that he doesn't believe we've been doing this exercise over the years in a way that's been completely ignoring one part of the dialogue or discussion. Now if you're saying you're not hearing me or listening to me unless you do exactly what I want, then I could see how that might be a conclusion one would get to. But again, to the Commissioner's point, it's a balancing act and we're trying to do the best job we can in balancing all these interests.

Molly Olson reiterated her idea to put up a slide with all the community concerns heard. She said that a few of us sitting in a corner could probably come up with a list of 25 concerns and you keep talking about only two.

Laura Kaschmitter said we've submitted over 180 letters to you – where are those letters saying our problems with it? They've never shown up on a slide. You say you welcome public comment, great, but

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where is it on a slide? Marlon said every single one is available on the website. Laura replied we don't want it on the website; we want it where you guys can see it. We're having to look at all your slides; why can't you look at our concerns on a slide? Mary Vierling asked where are the pros and cons? Laura asked where are the checks and balances of this? Chad Leque said that's a fair question and noted we're roughly about at the halfway point of this process. He said we will get to a point where there's going to be a formal review, a formal public hearing, and opportunities for everybody to submit comments and they're all going to be responded to in writing and dealt with formally as part of this process. Laura said but you keep going forward but our concerns are never going forward. We're having to submit the same complaints and concerns over and over again that are never being addressed publicly. You say you'll get a letter and you read it. Okay, that's nice, but why is it not being addressed? Chad offered that as part of this exercise we're trying to address what we can while still fulfilling our statutory obligation for aviation infrastructure in the metropolitan area. To the degree that there is overlap between what you're saying a segment of the community might want to see and what we can and are trying to do, while still meeting the Purpose & Need of the project, there are some areas where we may not be able to address some of the concerns that are raised. Keith Bergmann said I'm not sure if you're hearing her though – she's not saying you necessarily have to address all the concerns, just show that we've heard them. Laura said she just wants acknowledgement of what we are asking. Molly again reiterated her idea to show a comprehensive list of concerns on a slide. She suggested two sides of the slide: "here are the two things the MAC has considered (the road and the length of the runway) and here are the 25 others that are not within our Purpose & Need to care about these so we are ignoring these." She said that's basically the message she's been getting. Keith said some of the meetings we've gone over some of these. For example, the road. At one meeting, we looked at five different plans for the road, and whether or not Baytown wanted a road for roundabouts or cul-de-sacs, then they got filtered and moved on. Not that they address all the concerns at every meeting, but they try to go back to some of them sometimes. Now, the MAC has moved forward past it and at this meeting, we're not talking about those five different road proposals. Like it or not, they've moved past. Some of them have been addressed in different formats but not shown every time. Molly again reiterated, we want a comprehensive list of what has been presented and what you're aware of that the community is not happy with, and what you're going to address on that list and what you won't. She said, I'm pretty confident that your pat answer that will be shown for most of them is "considered and not an issue," which is pretty insulting, but at least acknowledge the concerns.

Kent asked the Kaschmitters, saying he knows they were impacted by the original road configuration, if they thought the people that are now on the north end of Neal and the south side of 30<sup>th</sup> on the corner like the new configuration better than the old one? He said his guess is probably not. Laura said they don't like either. They don't want the road changed at all – it's not safe for us to have it changed and we don't want it changed. It's that simple. So Kent confirmed the option in their minds is don't do anything with the road? Laura said you can repave the runway, you can do whatever you want just stay within the confines of the fence. Kent said he just wanted to find out because he figured the people on that corner probably like that the least, because now all the cars are going to come out in their area. Laura said, we're right there as well. Kent said you guys have been gracious about being active and you got the initiative to have that change made through this process. Kent said he's been disappointed at the turnout for the last public meeting. He acknowledged he's heard the dots on the top concerns board may have been offensive to some, but he counted the dots on the board because it's one way to gauge, and there were 34 dots on the board, and 17 were for the "no concern" of the proposal. He asked where

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are all the other people who you're saying are going to be so impacted by this? He said from his perspective, from Baytown, that they don't care, because in 2 or 3 years the Township has heard nothing. He said he's disappointed if there's people who have feelings about it and opposing it that don't come forward, because he doesn't know how else we're going to get public feedback, because we've got none on the Baytown side. He said he doesn't know how you account for that. Referring to the last meeting, he said there were very few people there and only four from Baytown. Stephen said he and his wife weren't there because they were on a vacation. Kent said even if you were there, that'd only be six people from Baytown, and there are over 1,600 residents. And again, your wife was the only person who ever made any comment to us during the comprehensive planning process, or came to a meeting.

Evan Barrett closed the meeting at 8:10 P.M. He thanked everyone for attending, for the comments, questions and discussion and invited everyone to the public event on November 6<sup>th</sup> at Oak-Land Middle School.

# Lake Elmo Airport

## Environmental Assessment (EA)/ Environmental Assessment (EAW) Worksheet



October 19, 2017 – Community Engagement Panel Meeting #4  
Overview of Environmental Effects

L-148





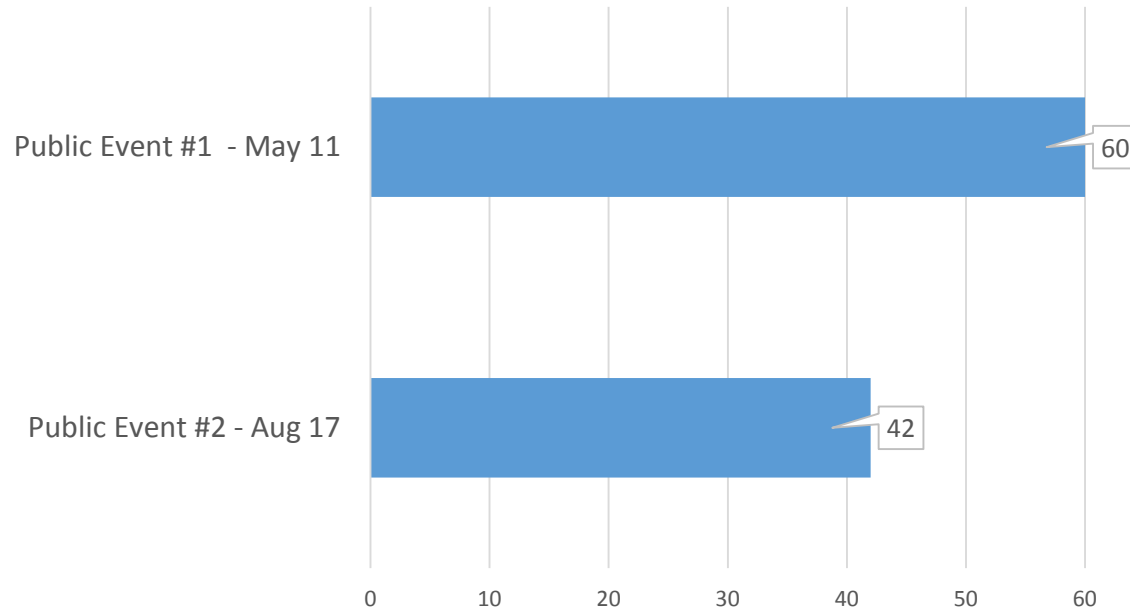
# Agenda

- Public Event #2 Debrief
- Environmental Effects Overview
- Next Steps
- Panel Discussion
- 10-minute Public Comment Period

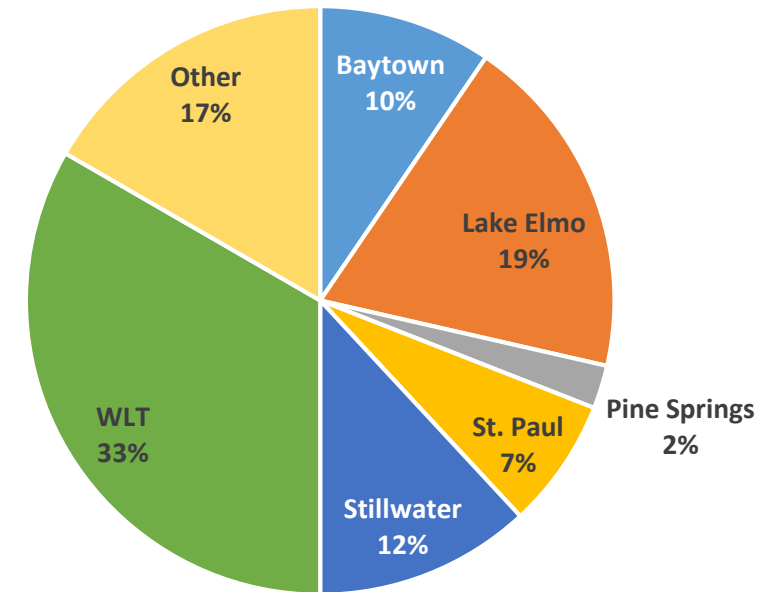


# Public Event #2 - Debrief

Public Event Attendees

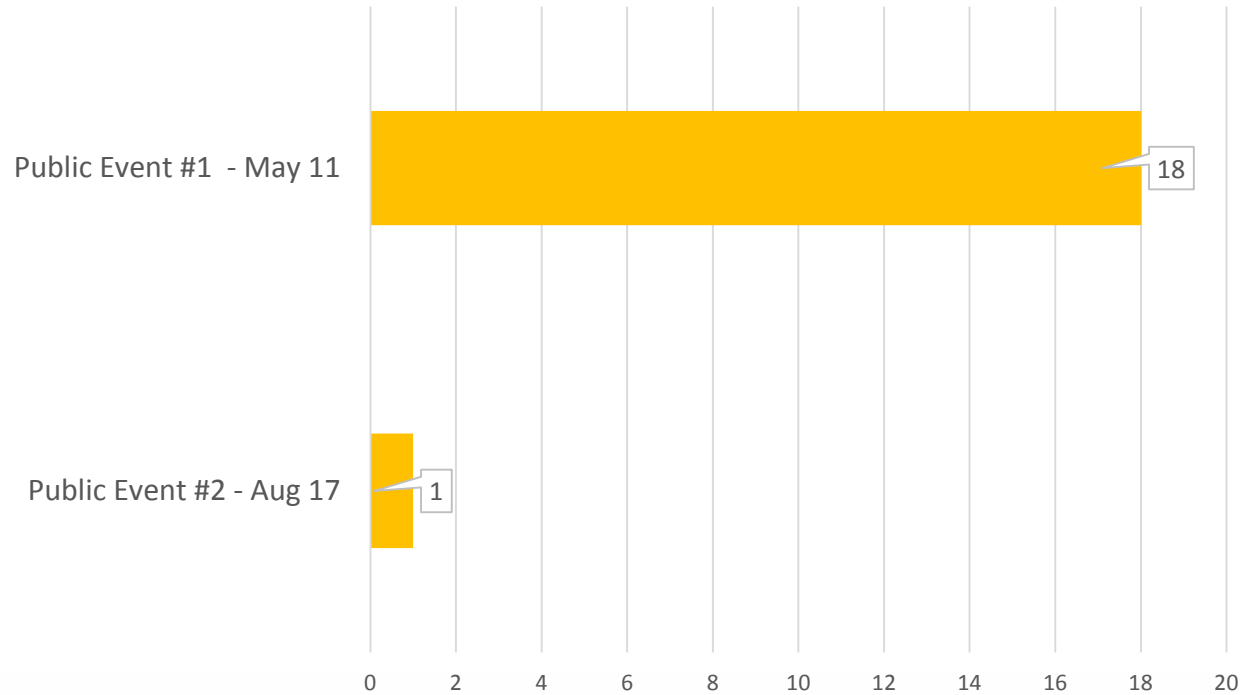


Public Event #2 Attendees by City/Township

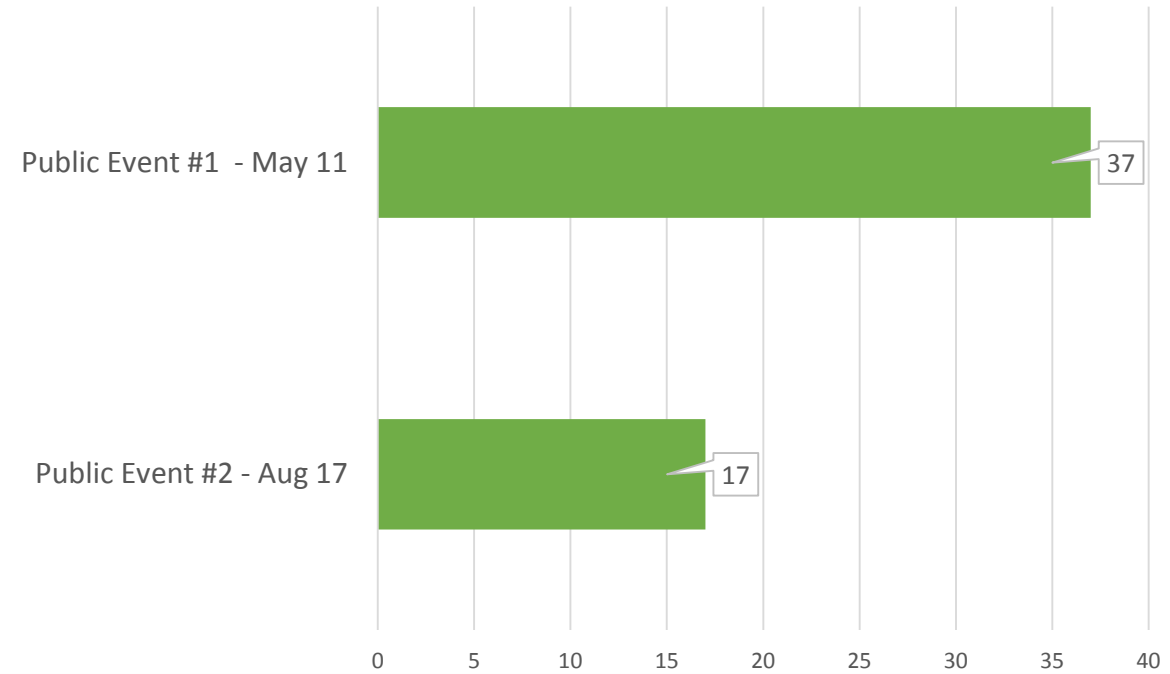


# Public Event #2 - Debrief

## Project-Specific Comments



## Added Email Subscribers



# Public Event #2 - Debrief

## Public Event #2 Agenda

- A. **6:00 Open House** – Project Orientation (Cafeteria)
- B. **6:30 Alternatives Presentation** (Auditorium)
- C. **7:00 Presentation Q&A** (Auditorium)
- D. **7:30 Community / MAC One-on-One Engagement Session** (Cafeteria)

Public Event

**Presentation**  
at 6:30 in Auditorium.  
Questions & Answers  
to Follow.

**Open House**  
in Cafeteria

MINNEAPOLIS SAINT PAUL NOISSEVILLE  
METROPOLITAN AIRPORTS COMMISSION  
MAC

Environmental  
Assessment  
Lake Elmo  
Airport

EA





# Things we did differently – how did they work?





- Venue – Oak-Land Middle School
- Hard copy meeting agenda for attendees
- “Top Concerns” board
- Hard copy presentation slides
- Scrolling FAQ slides
- Facilitated presentation and group Q&A
- Adjourn to one-on-one engagement session

Public Event


## Top Community Concerns

Common Concerns Regarding the Project

Place Sticker Below for Your Top Concern

▪ Impacts from a Relocated and Extended Primary Runway	
▪ Impacts from a Realigned 30th Street North	
▪ Justification for the Project	
▪ I don't have concerns related to these improvements	

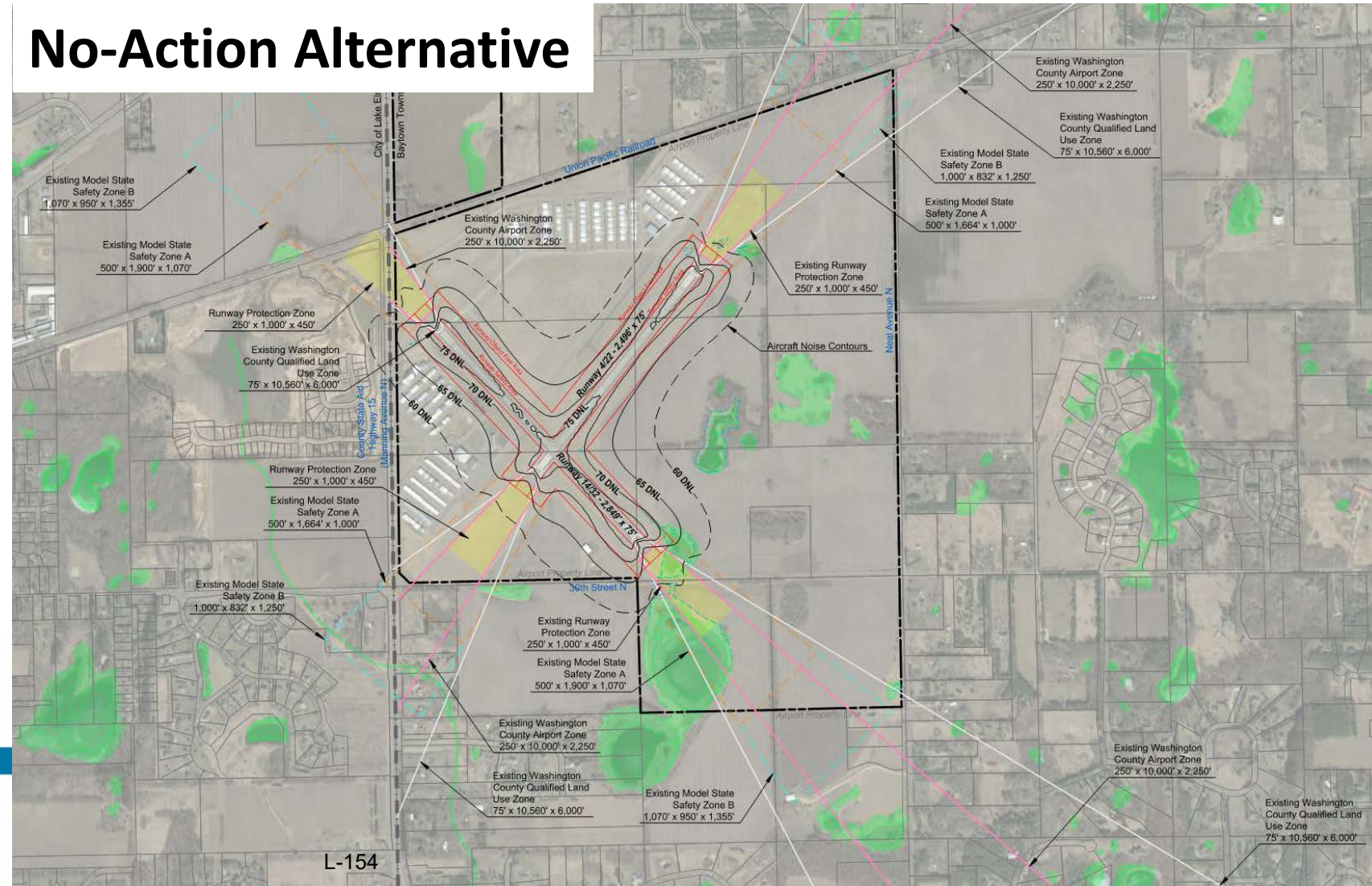
Environmental Assessment  
Lake Elmo Airport



# Method for Determining Environmental Effects

- Preferred Alternative compared against **No Action Alternative** to determine effects for each environmental category
- **No Action Alternative** represents what would occur if MAC were to maintain the existing airfield configuration and runway lengths

## No-Action Alternative



# Environmental Effects Overview

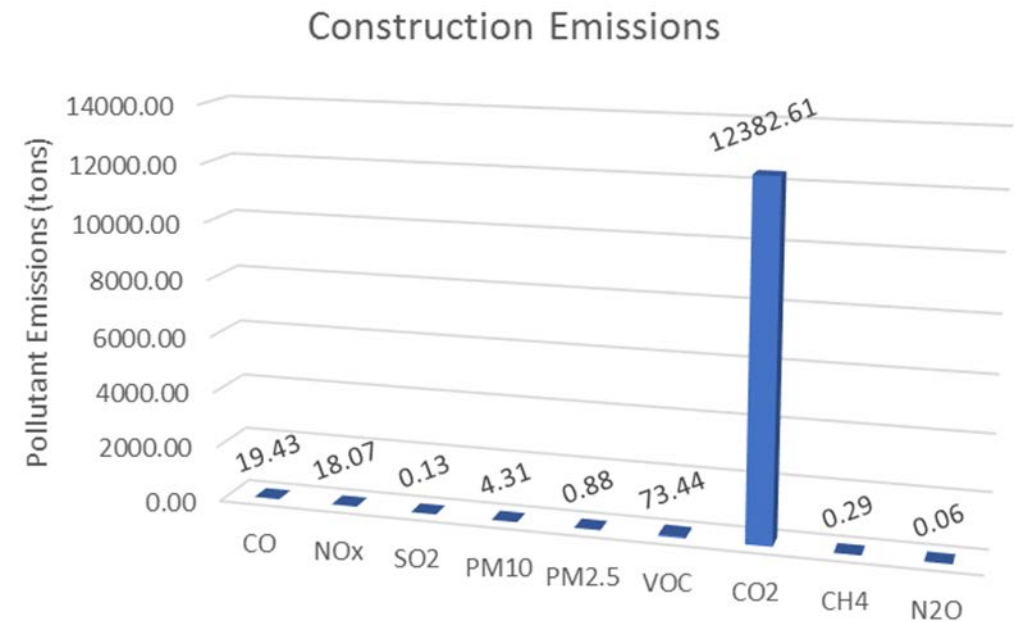
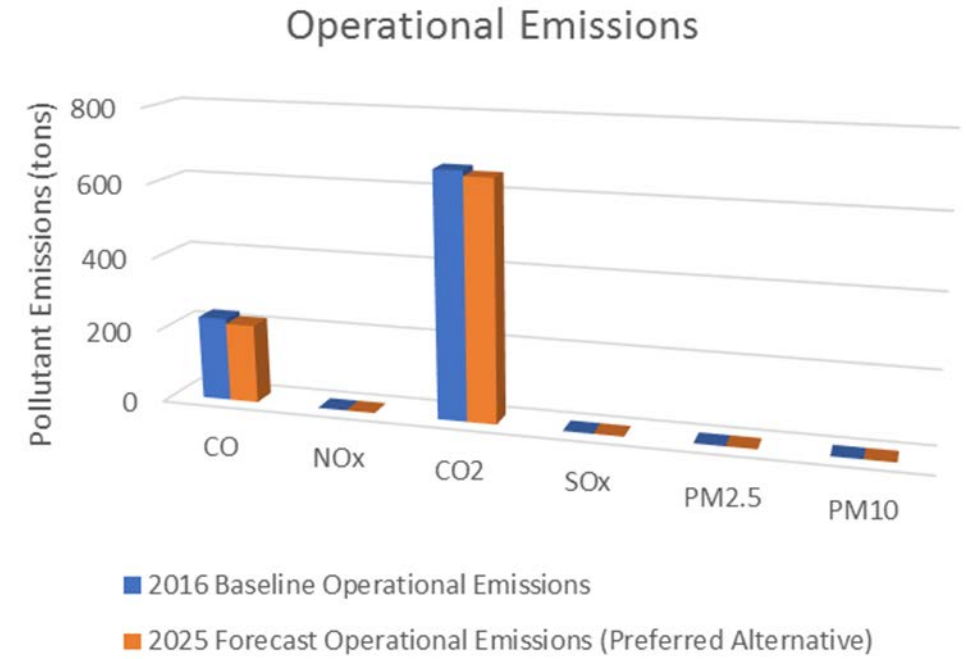
- NEPA categories considered in detail
  - Air quality
  - Biological resources
  - Cultural resources
  - Farmlands
  - Hazardous materials & solid waste
  - Land Use
  - Noise
  - Visual effects
  - Water resources
  - Cumulative impacts
- Other NEPA categories
  - Climate
  - Coastal resources
  - DOT Section 4(f)
  - Natural resources and energy supply
  - Socioeconomics



# Air Quality

- Emissions were evaluated with reference to National Ambient Air Quality Standards (NAAQS) and Clean Air Act requirements
  - NAAQS pollutants include CO, NO<sub>x</sub>, SO<sub>x</sub>, O<sub>3</sub>, Pb, and particulate matter
  - Other pollutants identified in charts at right are provided by the FAA model for informational purposes
- Operational emissions
  - 2025 “with project” emissions comparable to 2016 baseline emissions
  - Will not exceed FAA Air Quality Handbook *de-minimis* thresholds for NAAQS pollutants
  - Considers taxi out, takeoff, climb out, approach, landing, and taxi in operations
- Construction emissions
  - Will not exceed FAA Air Quality Handbook *de-minimis* thresholds for NAAQS pollutants
  - Considers all construction activities

De-minimis thresholds are the minimum thresholds (in tons) for which a Clean Air Act conformity determination must be performed, for various criteria pollutants in various areas. In Washington County, these pollutants are CO and SO<sub>x</sub>.





# Biological Resources

- Tree removal
  - Approximately 20 acres of trees affected on airport property
  - Off-site trees are being evaluated in coordination with FAA
  - Dominant tree species have been identified

## Tree Removal (pink areas)



# Biological Resources

- Federally-listed species
  - Northern long-eared bat (threatened species)
    - May be present in tree removal areas
    - Impacts will be avoided and minimized using USFWS/USDOT-recommended measures
  - Rusty patched bumblebee (endangered species)
    - Documented habitat within 2 ½ miles of airport
    - Airport is in low potential habitat zone per U.S. Fish & Wildlife Service
    - No suitable habitat in project impact area
- State-listed species
  - Blanding's turtle (threatened species)
    - May be present in both wetland and upland areas
    - Impacts will be avoided and minimized using MnDNR-recommended measures





# Cultural Resources

- Cultural resources (above and below ground) were evaluated with reference to the National Historic Preservation Act (NHPA) requirements
- FAA makes determination of effect and State Historic Preservation Office (SHPO) concurs
- Architectural history
  - 13 historic age properties within area of potential effect (APE)
  - Railroad corridor may be eligible for the National Register of Historic Places (NRHP)
    - Not affected by project
- Archaeology
  - Two sites may be eligible for NRHP due to association with Jacob Schmidt Brewing Company
    - Not affected by project
  - FAA consults with Native American tribes



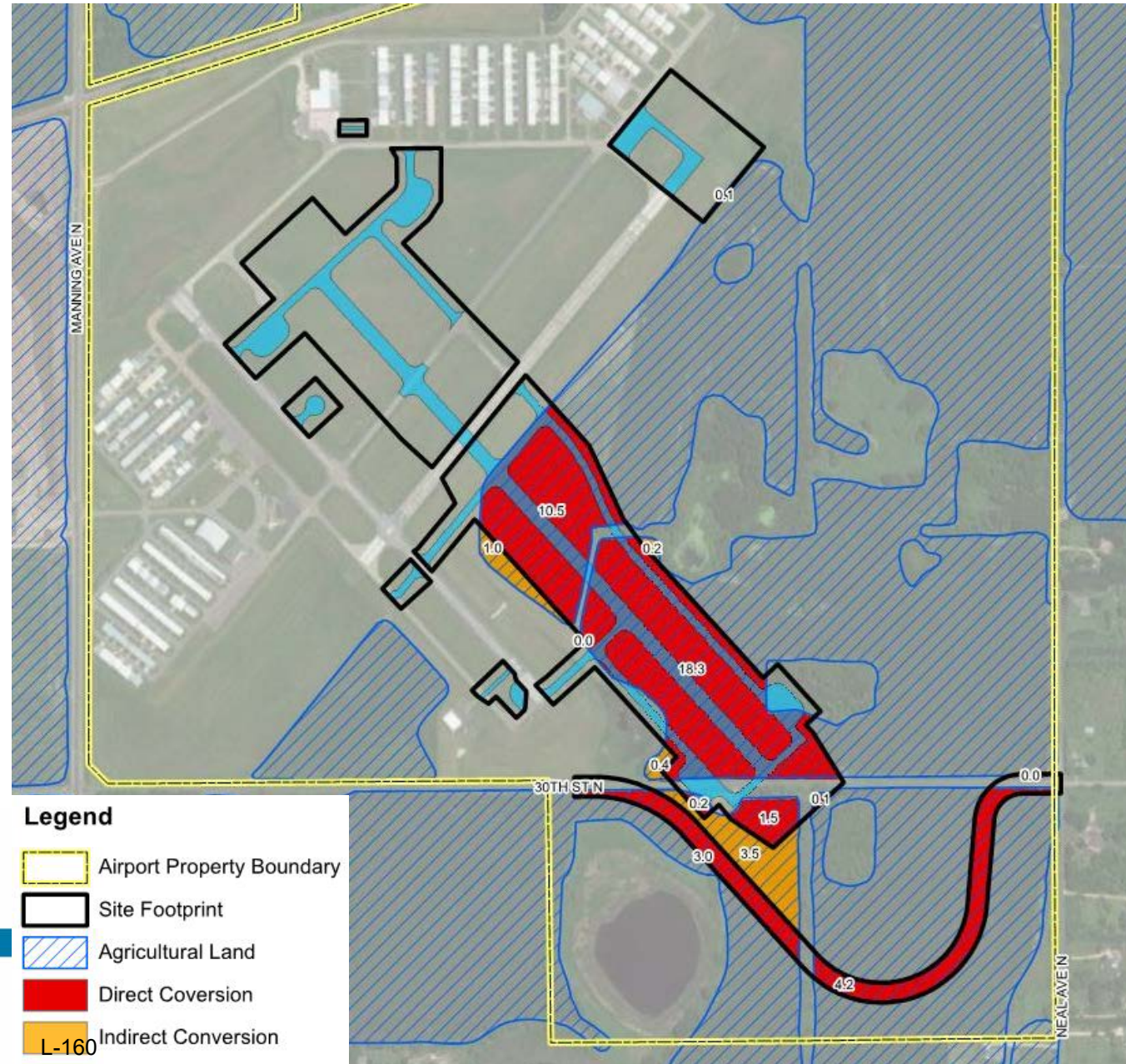
Figure 20. 1964 aerial photo of general project area and locations of 21WA0119 and 21WA0120 (Regents of the University of Minnesota 2017).





# Farmlands

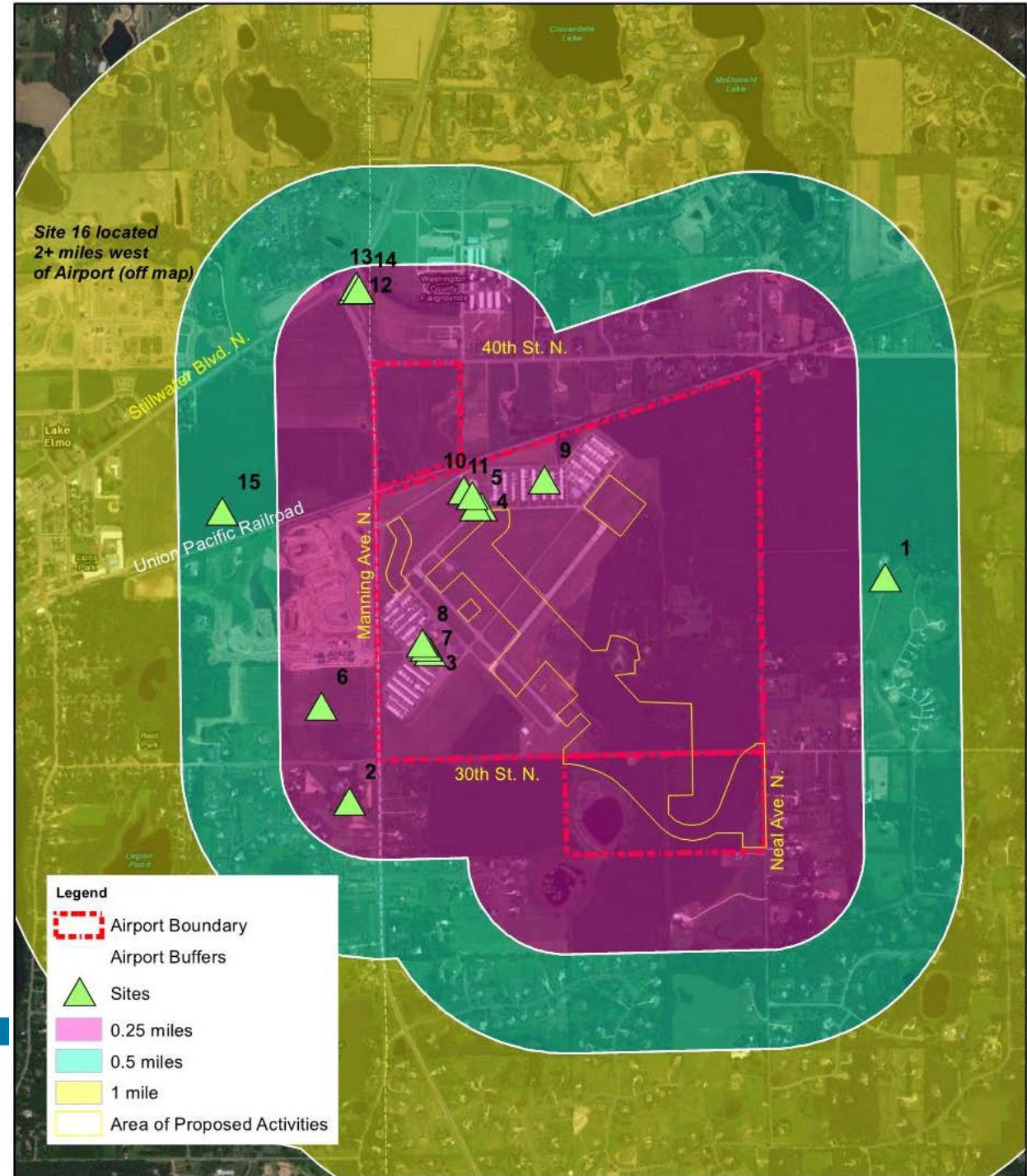
- Farmlands were evaluated with respect to federal Farmland Protection Policy Act (FPPA)
- Approximately 38 acres of on-airport farmland would be directly converted
- Approximately 5 acres would be indirectly converted (uneconomic remnants)
- U.S. Department of Agriculture consultation in process to determine significance of effects





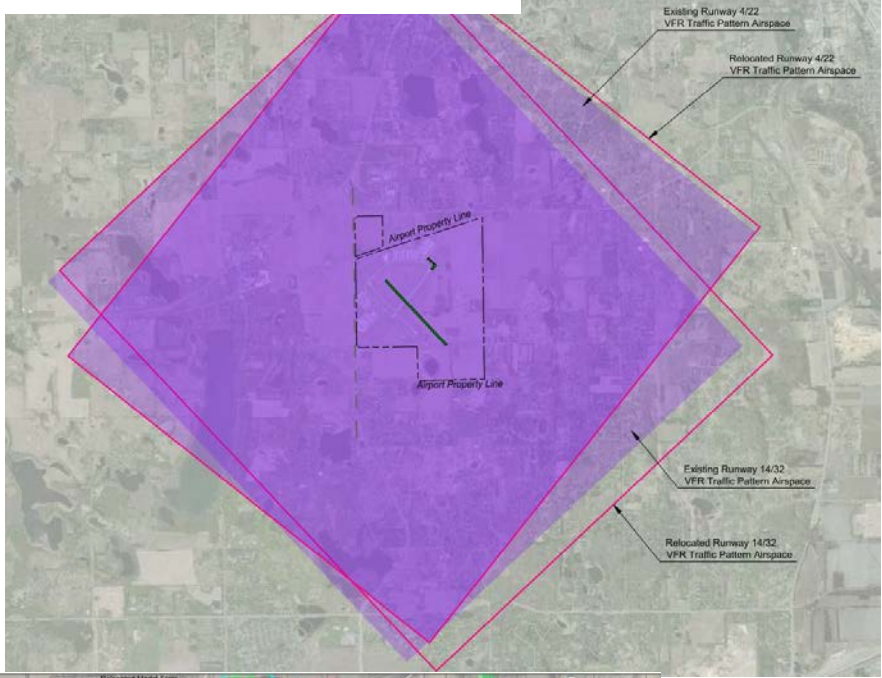
# Hazardous Materials & Solid Waste

- Known hazardous materials sites identified and evaluated with reference to various federal and state legislative requirements
- 17 known hazardous materials sites identified within one mile of Airport
- None of the sites will be affected by the project
- Groundwater contamination plume would not be affected due to water table depth





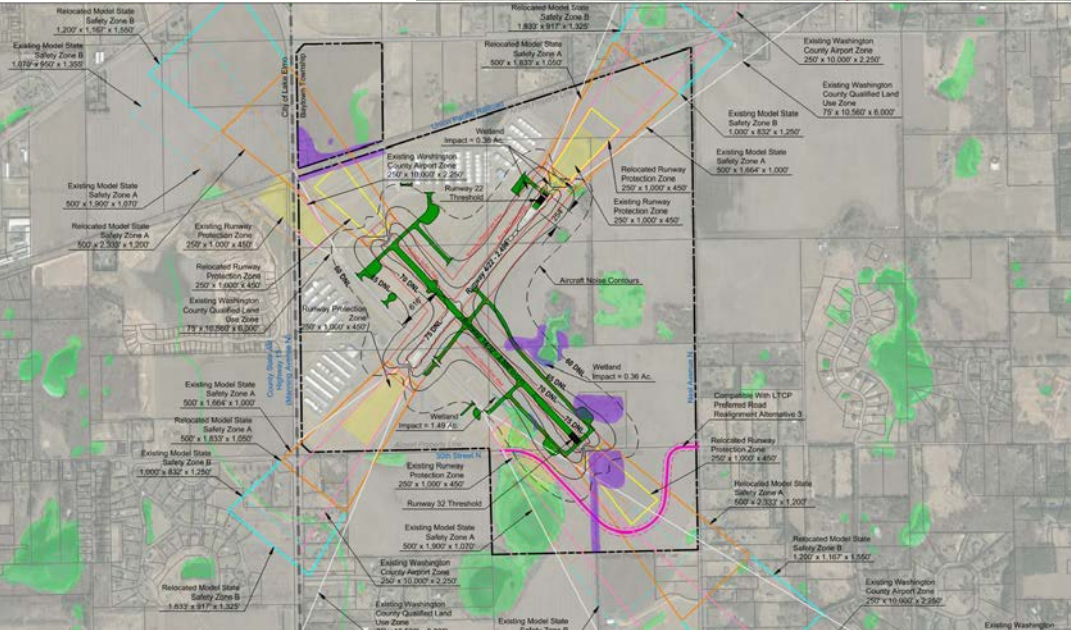
# VFR Traffic Pattern Area



# Land Use

- Residential

- Minor changes to visual flight rules (VFR) traffic pattern area
- Runway 14/32 State Model Safety Zones
  - Three houses in Model Zone A
  - Ten houses in Model Zone B
- Runway 04/22 State Model Safety Zones
  - Two houses in Model Zone A
  - Ten houses in Model Zone B
- The MAC will convene a Joint Airport Zoning Board (JAZB) consistent with Minnesota Statutes



Model Safety Zones



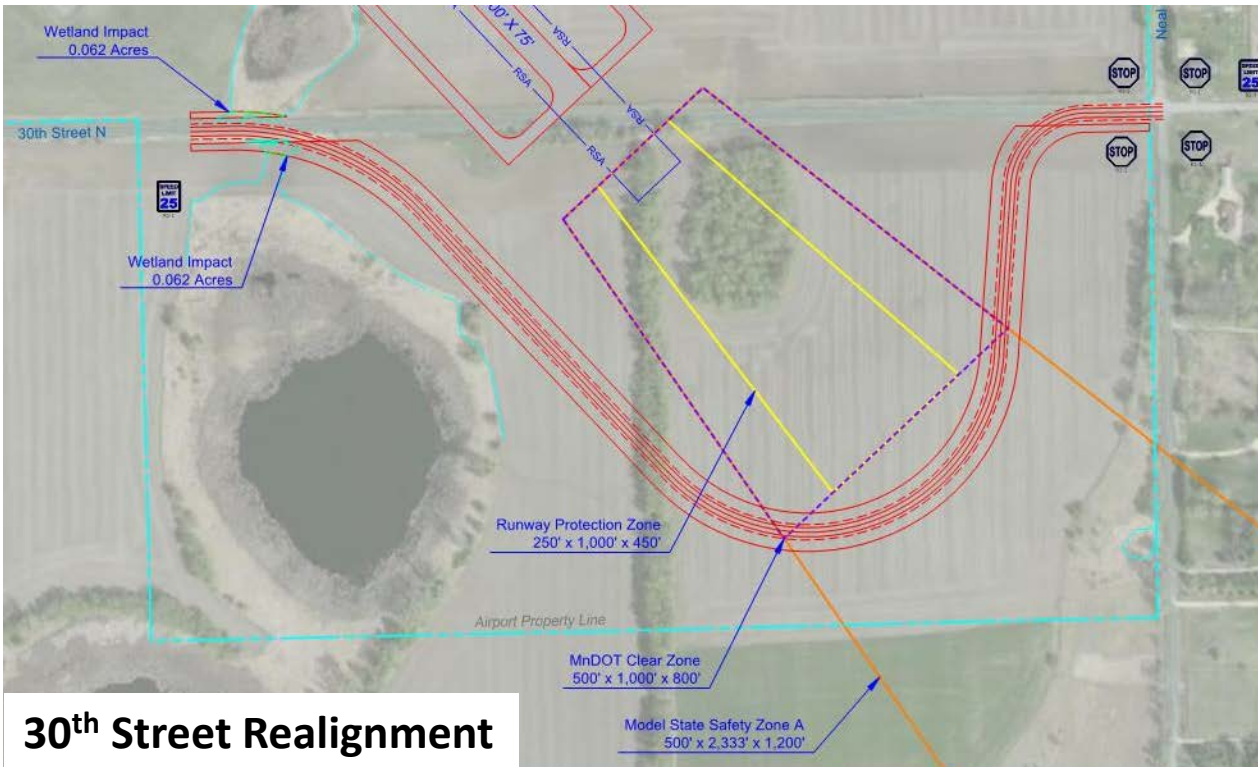
# Land Use

## • Ground Transportation

- Realigned road can accommodate forecasted traffic volume and type
- Travel time will increase an average of 46 seconds in either direction
- FAA approval required for new road right-of-way on existing airport property

## • Wildlife Attractants

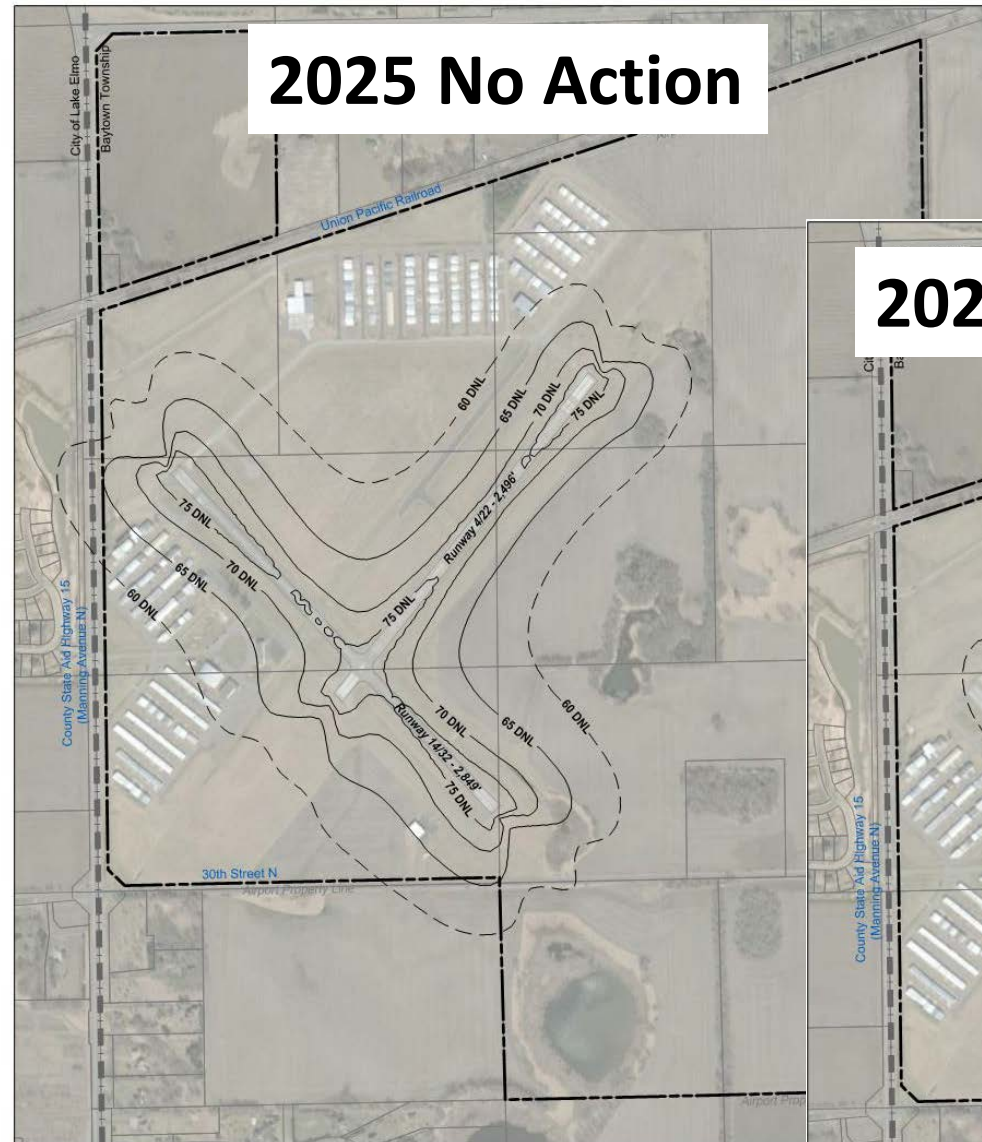
- No new attractants
- Tree removal and ag lease reductions would mean fewer attractants
- Site visit by certified wildlife biologist this week to confirm



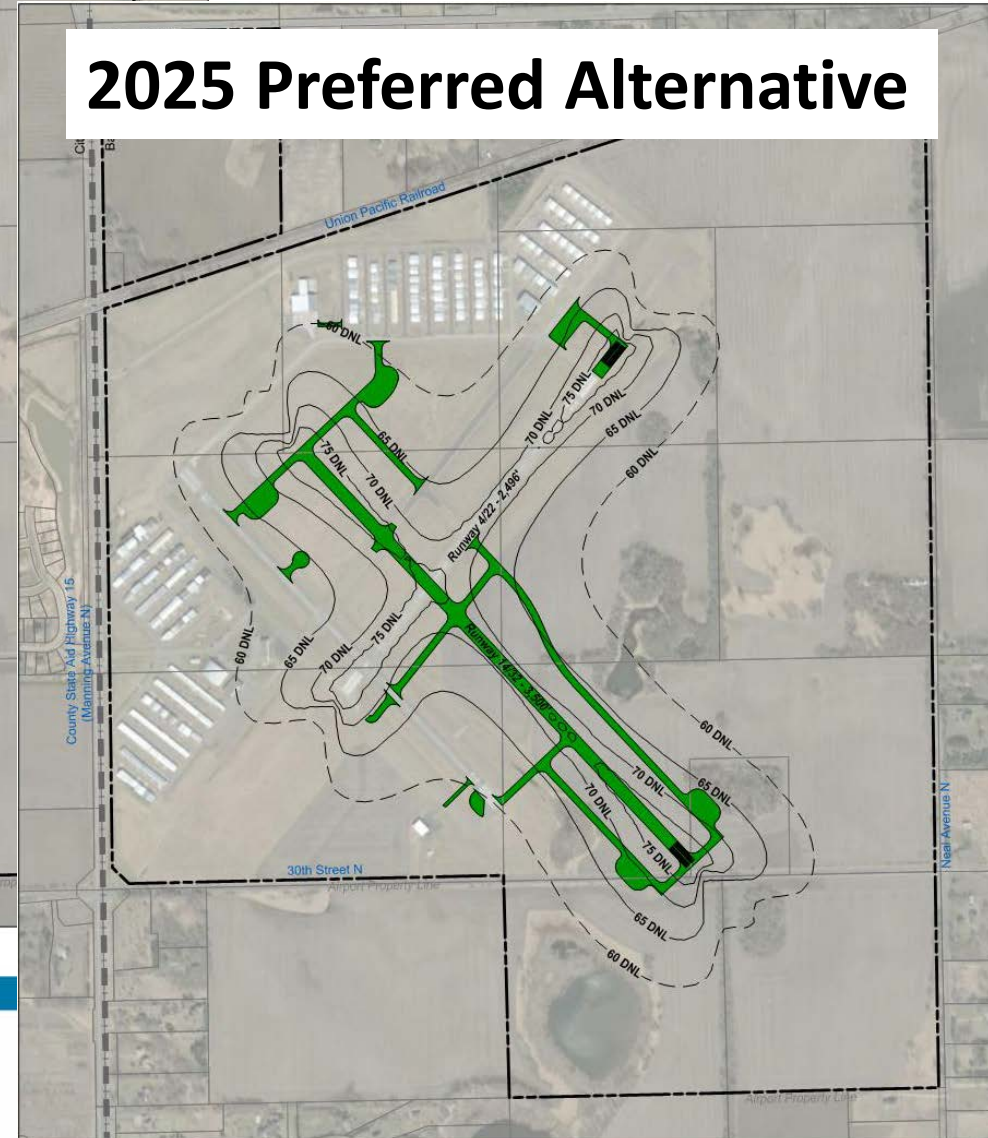


# Noise

- 65 decibel day night average sound level (DNL) noise contour remains on Airport property under both No Action and Preferred Alternatives



Note: Aircraft noise contour 60 DNL is shown for informational purposes only.

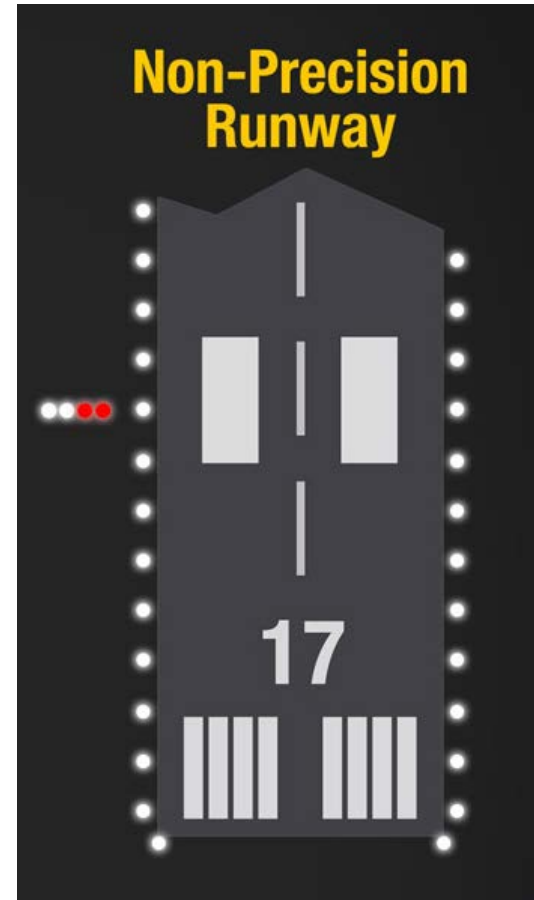


Note: Aircraft noise contour 60 DNL is shown for informational purposes only.



# Visual Effects

- Non-precision lighting systems
  - MIRL (medium-intensity runway lights)
  - PAPI (precision approach path indicator)
  - REIL (runway end identifier lights)
- Project lighting components
  - Relocate and extend existing Runway 14/32 MIRL, PAPI, and REIL systems
  - Install new Runway 04/22 MIRL, PAPI, and REIL systems



Source: boldmethod.com



Source: Astronics



Source: Airport Lighting Company



PAPI

L-165



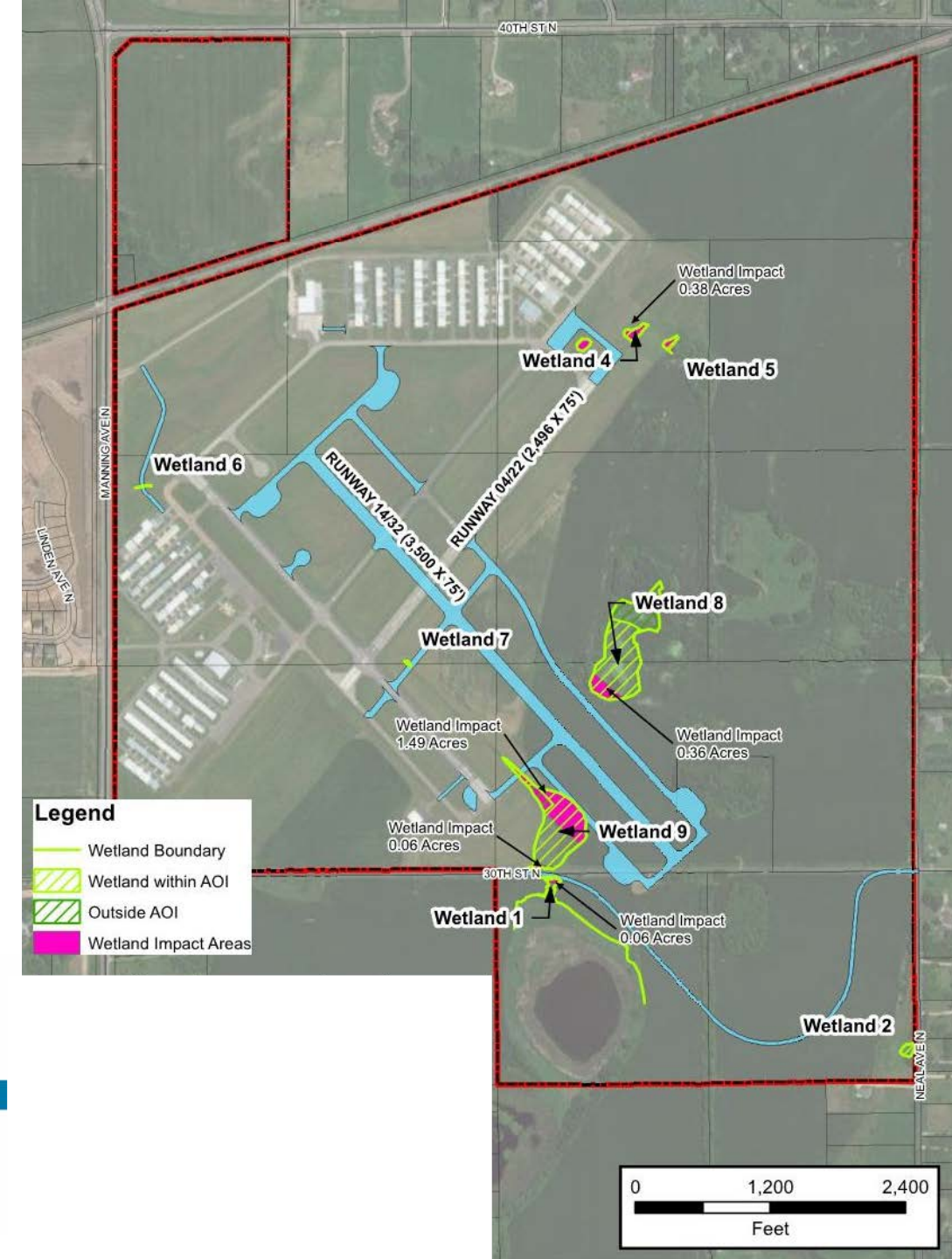
# Visual Effects

- MIRL, PAPI, and REIL systems will move closer to residential areas
  - Distance from Runway 32 end to property line will be reduced from 2,400 to 1,900 feet
  - Distance from Runway 22 end to property line will be reduced from 2,250 to 2,000 feet
- Light systems will only be fully operational when “keyed on”
- Light screening benefits of trees along Neal Avenue are being evaluated



# Wetlands

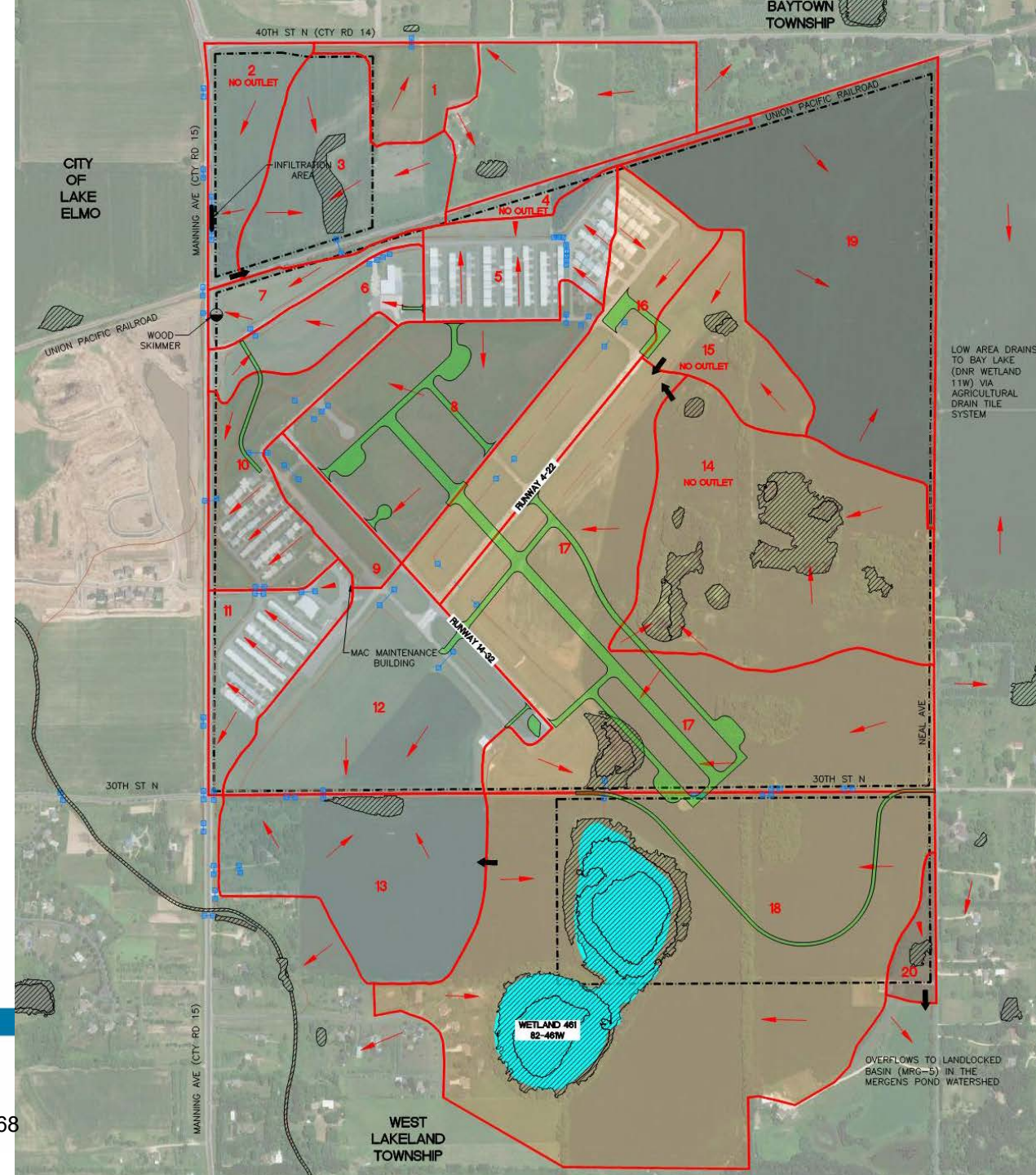
- Wetlands evaluated with respect to federal Clean Water Act and state Wetland Conservation Act requirements
- Approximately 1.97 acres of direct wetland impacts
- Mitigation requires replacement at 2:1 ratio if purchasing wetland credits within the same wetland bank service area
- Requires permits from U.S. Army Corps of Engineers & Valley Branch Watershed District





# Surface Water

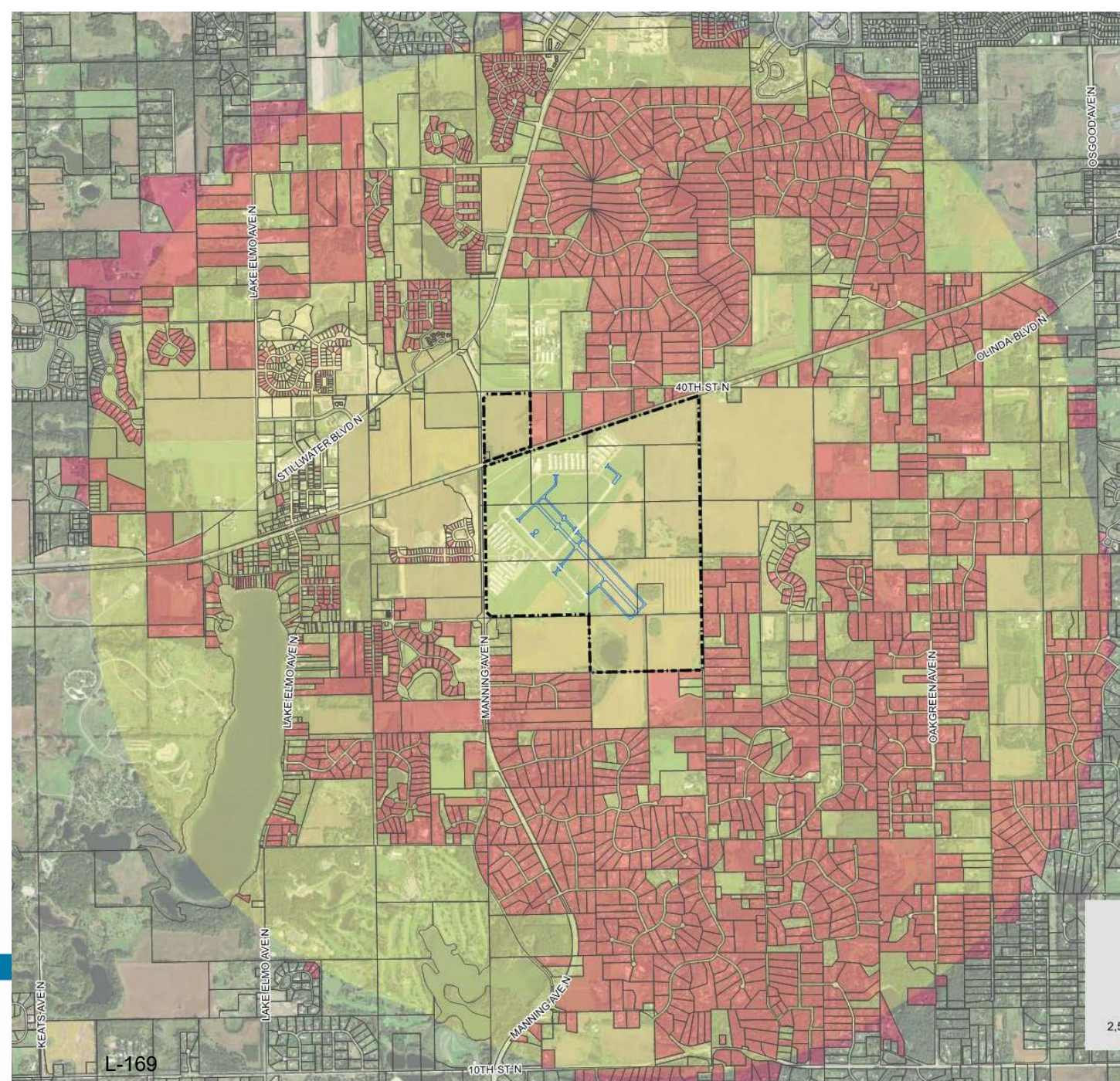
- Net increase of 550,000 square feet impervious surface
- Permits required from Minnesota Pollution Control Agency (MPCA) and Valley Branch Watershed District (VBWD)
  - Permits will require specific performance standards for on-site stormwater management
- FAA standards require stormwater detention facilities be designed to be drawn down within 48 hours of a storm
- Structural controls and best management practices will allow for meeting MPCA, VBWD, and FAA standards
- Minnesota Department of Natural Resources permit may be required for public water south of 30<sup>th</sup> Street
- An estimated 0.06 acres of wetland fill would occur in a floodplain
  - Net loss of floodplain storage is insignificant when considering the volumes associated with a 100-year event
  - No notable adverse impacts on natural and beneficial floodplain values





# Cumulative Impacts

- Past, present, and reasonably foreseeable actions
  - 1,720 parcels developed since 1964 within two miles of project
  - Continued urban development expected, especially west of the airport
  - Manning Avenue planned to widen from two to four lanes
- Wetland impacts of project will be compared to recent and reasonably foreseeable permitted activity



# Other NEPA Categories

- Climate
  - Potential for preferred alternative to affect future climate conditions is limited
- Coastal Resources
  - No resources present
- DOT Section 4(f)
  - No resources present
- Natural resources and energy supply
  - Demand for natural resources and energy will not exceed available supplies
- Socioeconomics
  - No shifts in population, public service demands, or economic activity
  - No low-income or minority populations affected
  - No potential disproportionate health or safety risks to children



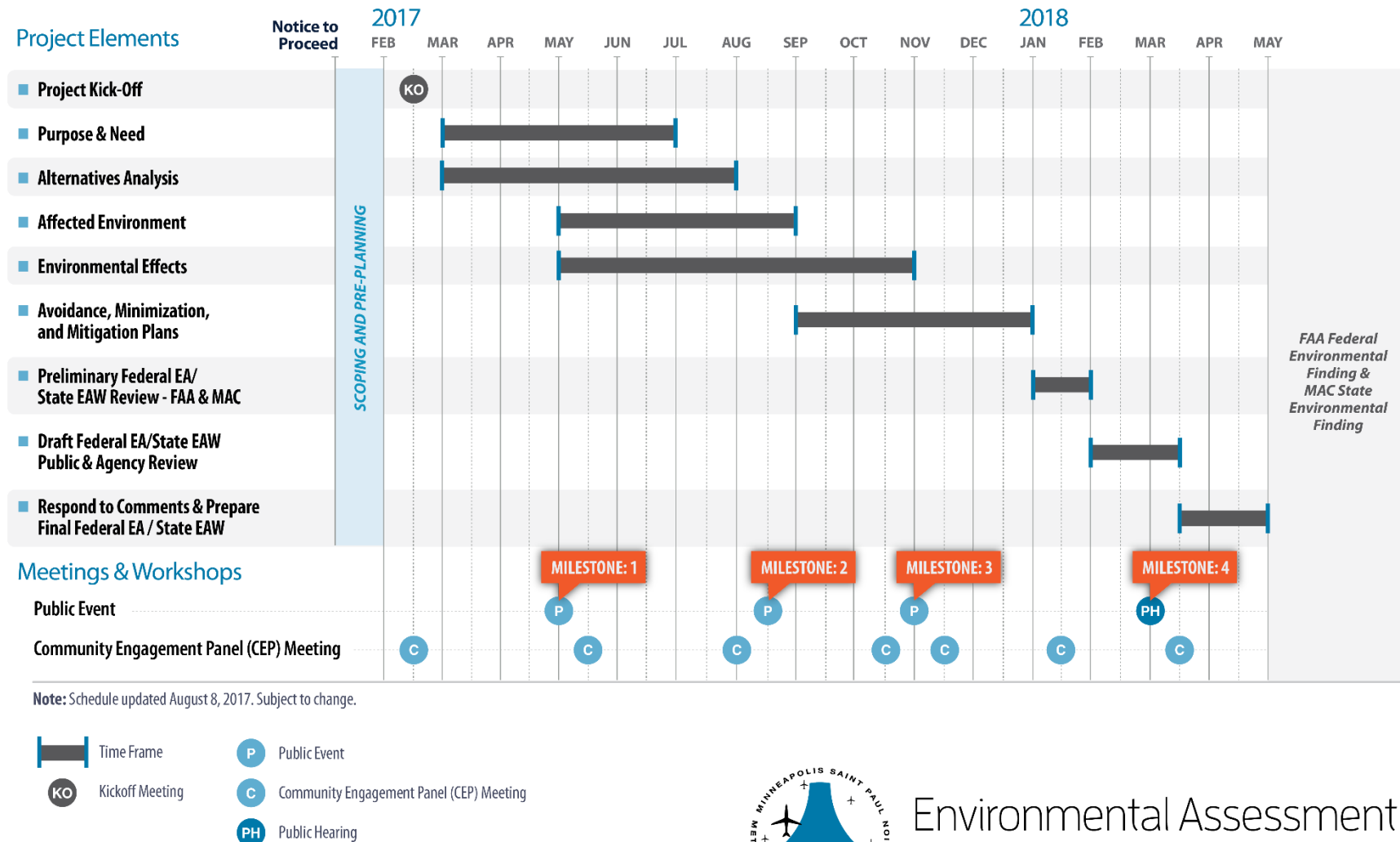


Summary of Environmental Effects (DRAFT)				
Environmental Impact Category	Impacts: No-Action Alternative	Impacts: Preferred Alternative	Required Permitting, Mitigation, and/or Associated Actions	
Air Quality	None	Minimal impacts during construction	None	
Biological Resources (including fish, wildlife, and plants)	None	Tree removal	<ul style="list-style-type: none"> <li>Tree removal to occur during NLEB dormant season (October 1 – April 30)</li> <li>Implement April 2015 USFWS/USDOT NLEB avoidance and minimization measures</li> <li>Implement MnDNR Blanding's turtle avoidance measures</li> </ul>	
Climate	None	None	None	
Coastal Resources	NA	NA	None	
DOT Section 4(f) Lands	NA	NA	None	
Farmlands	None	43 acres converted directly or indirectly	To be determined	
Hazardous Materials, Solid Waste, and Pollution Prevention	None	None	Dispose of construction materials and other solid waste in accordance with state and local laws.	
Historic, Architectural, Archaeological, and Cultural Resources	None	None	Awaiting SHPO concurrence with FAA determination of effect	
Land Use	Residential	Potential zoning conflicts	Potential zoning conflicts	Convene Joint Airport Zoning Board (JAZB) to develop an Airport Zoning ordinance
	Ground Transportation	RPZ conflicts	Increased travel time on 30 <sup>th</sup> Street	None
	Wildlife Attractants	Wetlands in vicinity of runway approach	Wetlands in vicinity of runway approach	To be determined
Natural Resources and Energy Supply	None	None	None	
Noise and Compatible Land Use	None	None	Update voluntary noise abatement plan and hold educational briefings for pilots	
Socioeconomics, Environmental Justice, and Children's Health & Safety	None	None	None	
Visual Effects (including light emissions)	None	Existing light system relocations and new light system installations	To be determined	
Water Resources	Wetlands	None	1.97 acres direct wetland impact	<ul style="list-style-type: none"> <li>Compensatory Mitigation Plan (assume impact will be banked)</li> <li>USACOE 404 Army Corps Permit and Compliance with Minnesota Wetland Conservation Act</li> <li>MnDNR Public Waters permit</li> </ul>
	Stormwater	None	12.6 acres increased impervious area	<ul style="list-style-type: none"> <li>Stormwater Pollution Prevention Plan</li> <li>Onsite Best Management Practices</li> <li>MPCA CWA Section 401 Water Quality Certification and NPDES permit</li> <li>VBWD permit</li> </ul>
	Floodplains	None	0.06-acre wetland fill area in floodplain	VBWD permit
Cumulative Impacts	None	Under evaluation	To be determined	

Green shaded items represent categories for which impacts and associated actions have been definitively determined, and will not be revisited in subsequent CEP meetings.

# Next Steps

- **November 6**
  - Public Event #3
- **December**
  - CEP Meeting #5 (proposed consolidation of November & January meetings shown in current schedule at right)
- **Early 2018**
  - Publish Draft EA/EAW for public review and comment



Environmental Assessment  
Lake Elmo Airport





# Lake Elmo Airport Federal EA / State EAW Community Engagement Panel Meeting #5

January 16, 2018  
6:00 P.M.



## Agenda

1. Environmental Effects Update
  - Biological resources
  - Cultural resources
  - Farmlands
  - Land use / wildlife hazards
  - Water resources
2. Draft EA/EAW publication and public comment period timeline
3. Plan for soliciting, documenting, and incorporating public comments into the Final EA/EAW
4. Public hearing format and guidelines
5. Panel Discussion
6. 10-Minute Comment Period  
*For guests making a comment, please state your name and address.*



**LAKE ELMO AIRPORT FEDERAL EA / STATE EAW**

# Community Engagement Panel

## Meeting #5 Minutes

Baytown Community Center  
January 16, 2018  
6:00 P.M.

**Panel Attendees**

Marlon Gunderson  
Mary Vierling  
Dave Schultz  
Kent Grandlienard  
Stephen Buckingham  
Ben Prchal  
Chad Leqve  
Neil Ralston  
Michael Madigan

**Other Attendees**

Joe Harris  
Brad Juffer  
Evan Wilson  
Evan Barrett  
Colleen Bosold  
Todd Streeter

**Public Observers**

Tom Vierling  
Pat Schultz  
Gary Kriesel

**Absent Panel Members**

John Renwick  
Keith Bergmann  
Ann Pung-Terwedo  
Robin Anthony

**Representing**

Airport Tenant/User and City of Lake Elmo Resident  
West Lakeland Township Resident  
West Lakeland Township Supervisor  
Baytown Township Supervisor  
Baytown Township Resident  
City of Lake Elmo Planner  
Metropolitan Airports Commission Director of Environment  
Metropolitan Airports Commission Airport Planner  
MAC Commissioner District F

**Representing**

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Mead & Hunt  
Mead & Hunt  
Community Collaboration

**Resident of**

West Lakeland Township  
West Lakeland Township  
Washington County Commissioner

**Representing**

Airport Tenant/User  
City of Lake Elmo Resident  
Washington County Public Works Planner  
Greater Stillwater Chamber of Commerce

# Meeting Minutes

*The attached report represents this writer's interpretation of items discussed during the meeting. Any corrections or additional information should be brought to our attention for clarification.*

## **The purpose of the meeting was to:**

- Present the final results of the environmental effects of the proposed development (preferred alternative).
- Share information with the CEP members on the public hearing timing, format and guidelines.
- Continue to equip CEP members to be the point of contact for information sharing, both to and from the community and MAC, and to respond to inquiries from their constituent groups.

## **The presentation was as follows:**

A copy of this presentation can be found at: [metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-CEP-Meeting-5-Presentation-01-16-2018.aspx](http://metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-CEP-Meeting-5-Presentation-01-16-2018.aspx)

Evan Barrett, Mead & Hunt (MAC's consultant) Project Manager for the environmental review process, opened the meeting by welcoming everyone and thanking them for coming. He then announced the CEP had a new member joining tonight—Ben Prchal, Lake Elmo City Planner—and suggested going around the table and having everyone introduce themselves and who they represent. The CEP members in attendance each introduced themselves.

Evan then outlined the agenda for the evening. He said while there wasn't a significant amount of new material to share with the group tonight, the intent of the meeting was to have one more opportunity to check in prior to publishing the EA/EAW document. He stated the last time the group met, the team was nearing completion with all the field work and analyzing the results—for some categories the work was complete, but not for all. He then said, at this point in time, all that work has been completed. He said he would provide updates on the environmental effects categories for which there was new information since the preliminary results he covered at the October 19 CEP meeting, and then would discuss the timeline for publishing the draft document and provide details on the public comment period and public hearing.

Evan reported the following updates:

- Biological Resources – includes fish, wildlife and plants
  - At the time of the last meeting, the FAA was still working on its finding for the Endangered Species Act, as there are two federally-listed species (northern long-eared bat, a threatened species, and rusty patched bumblebee, an endangered species) known to exist near or on the airport.
  - The FAA issued a finding of “may affect, not likely to adversely affect” those species. Best management practices and mitigation measures will be identified in the environmental document for avoiding any affects to those species. Given that those measures will be taken, the FAA determined there will be no adverse effects to endangered or threatened species. The US Fish & Wildlife Service (USFWS) concurred with this finding.
  - USFWS suggested the MAC consider managing a portion of the airport property as a pollinator habitat. The MAC is considering the benefits, risks, costs, potential partnerships and FAA input of doing this. The rusty patched bumblebee is a pollinator



- that plays an important role in the food chain. Several other types of insect species, such as the Monarch Butterfly, could also benefit from this.
- Kent Grandlienard asked if the pollinator habitat is proposed for areas that are currently ag land? Evan responded the area being considered is south of the proposed realignment of 30<sup>th</sup> Street N., which is ag land currently
  - Kent then asked if this is a mitigation measure? Evan responded that it's considered a voluntary environmental enhancement. He said, we're not mitigating for anything necessarily, but it's a way the MAC can provide a benefit from having that land that won't be used for any type of airport use.
  - Neil Ralston added it would be converting that ag land to a tall-grass prairie-type habitat. Kent shared concerns about tall-grass prairie habitat attracting ground-nesting birds, which then attracts coyotes, foxes and other wildlife. He stated his surprise that that type of habitat would be recommended on an airport. Evan said that part of the reason the team is looking at the area south of 30<sup>th</sup> Street N. is that it's outside the airport fence, to prevent any mammals that might be attracted to that habitat from getting onto the airfield. Evan also said the ag land itself is a wildlife attractant for deer, geese and other species, and that the project team has had initial conversations with the USDA. USDA concurs it will attract other types of species, but if you balance the equation of taking away the ag land vs. implementing the tall-grass prairie, there's a net benefit from a wildlife hazard perspective.
  - Kent said fences don't keep critters out and believes there will still be wildlife issues and said that's something to consider. He said raptors are attracted to the tall-grass prairie. Evan responded that the team is having conversations with the FAA to make sure all of these things are being considered, as well as what the implications are of attracting endangered species to an airport. There are other considerations such as would this be considered park land or controlled access. Evan said there are a lot of different considerations that are being weighed, and wildlife hazard is one of them.
  - Dave Schultz asked if there was no concern about removing 25 acres of trees? Evan responded that the agencies have not identified any required mitigation beyond the best practices noted for the northern long-eared bat. He said the benefit is that you have clear approaches to the runway, which is something that needs to be done anyway. Some of the trees identified for removal would need to be removed anyway for the existing runway and stated this is an opportunity for the MAC to take care of an existing issue. Regarding bats, Evan stated that it's a species that nests in trees, but if the trees are removed in the winter time, that should avoid any incidental taking of the bats associated with the tree removal. Evan also noted that Dave had expressed concerns at a previous meeting that when the bats returned, the trees would be gone and the bats would have to find a new place to nest, and confirmed that was true; however the USFWS's concern was with the incidental taking of the bats during tree removal activities, and they concurred with the FAA's finding that with appropriate best management practices and mitigation measures, there would be no adverse effect.
  - Kent added one more thought to the discussion, saying that wild turkeys fly so fences don't bother them, and they love tall-grass habitat.
  - Chad Leque asked Mary Vierling if she had any thoughts on the matter.

## Meeting Minutes

- Mary responded that wildlife is on the airport/in the vicinity already anyway, including turkeys. She told Chad, I don't know what you're going to do because a fence won't keep them out. She said she has to stop for them on 30<sup>th</sup> Street N. all the time. She said they're abundant in the area.
- Dave said he's seen eagles and turkey vultures in the area.
- Chad asked the group if they'd view the pollinator habitat as something positive or not? Mary said she didn't know if there was a benefit between the tall grass vs. the ag land. She said it's running about the same. Stephen Buckingham said going from corn to tall grass means you're trading raptors for geese and pheasants. Evan noted the difference is that geese are a flocking bird so where there's one, there's hundreds of them, whereas the raptors tend to be a single occurrence. He suspected this is the view the USDA takes from a wildlife hazard perspective: any type of bird is not good, but you're likely to see a lot more birds with the ag land as opposed to the tall-grass prairie. Chad said what the MAC is trying to gauge is how the community would view the use of airport property for something that is more natural than ag land. But, he said, if the perception is that it's six one way, half a dozen the other, that's good information to bring back to the MAC and it's a good discussion to have here. He stressed wanting to get input from the residents around the airport.
- Kent replied he's all for wildlife habitat, but just thinks it's an ironic situation.
- Mary said this is the area from the river valley where they have the return of the peregrine falcon. She also noted it's interesting to watch the pecking order of the eagles as they feed in the area. There's more than one eagle nesting in the area, there are multiple eagles. She said it's not on the airport property, but she believes there's an eagle nest to the south. She said they're feeding on something if they're happy there, because it's far from the river.
- Chad asked Mary whether tall-grass prairie on the airport would be viewed as an amenity from her perspective. Mary said she wasn't sure.
- Kent noted that Oak Park Heights Prison is doing a pollinator project right now. They had planned on tall-grass prairie, but he said there is pollinator habitat that is shorter grass and is less likely to bring in the bigger ground-nesting birds and some of the predators. He said it's all about height. Whether prey or predator, the taller grass prairie will attract more of it, he acknowledged he doesn't know enough about the pollinator plants, but said he thought there were shorter varieties that can be beneficial to the bees and butterflies but may not attract some of the larger predators. Evan responded that there are a lot of different options in terms of what can be done with the mix of species and how it's maintained, and that would be spelled out in a management plan if the MAC determines this is something they would move forward with. He also noted the MAC would consider partnering with a local agency and it would be interesting to find out who is working on the prison pollinator project. Kent said Washington County was involved, among others.
- Mary said her biggest concern right now is the number of birds, which don't match up well with the airport. She said that's likely due to the holding ponds and noted that has attracted a lot of birds. She said she didn't think the pond was meant to hold that much water, but it is, and now a new one is going in on the corner of 30<sup>th</sup> and Manning Ave. and that would be the next concern – how much water is that going to hold? She thinks

it's deeper than the one down by the north entrance. She said that's her biggest concern because if a plane comes down because of a bird, it's probably more likely than a plane getting hit by a deer. Chad said that's good feedback and as Evan had noted, the team is working with the FAA to get answers to questions like this as it pertains to potentially establishing this type of pollinator habitat on airport property and as it relates to wildlife hazards. He said the team is going to flesh some of this out a bit more before making any decisions. He said it has been helpful to get this feedback and thanked the CEP for their input.

- Evan stated there are several additional environmental benefits beyond just providing habitat for pollinators. Because there is less ag land, there are carbon sequestration benefits and climate benefits associated with the fact that these are plants that would not be harvested annually and would be there indefinitely. He stated the fact you're not using farm equipment on that land results in climate change benefits. There are also storm water management benefits because these are deep-rooting plants so a lot more of the storm water would infiltrate on-site and not be going into the pond. He noted these and other environmental benefits are being balanced against the risks and costs associated with it.
- Kent added one more comment that 35 years ago this area was a magnet for Canada geese during their migrations. People would drive from the cities out to Downs Lake, which they would call Goose Lake, and then to Lake Elmo, especially if we didn't have a lot of snow. There were thousands and thousands of geese, then the goose population started to increase in the 1960s, but in the early '60s they were an endangered species. It's diminished over the years compared to what it was 30-35 years ago, but it could cycle around again. He said he didn't know if it was a factor of what the farmers were planting or not planting, or snow cover. He said maybe taking away the ag land you would have some risk with other wildlife, but you probably wouldn't have thousands of geese because they don't like the tall grass, so you wouldn't have the potential for lots of waterfowl.
- Mary said when she first moved to the area 30 years ago, there was a wetland across the road from her that an elderly neighbor told her used to be the local swimming hole when she was a kid. It was clean enough water to swim in. Mary said when she moved out there, there was still a lot of open water and a lot of beavers, badgers and frogs that were in that pond. She said there were still a lot of them out there, along with woodchucks and possums. She recalled that for many years when they first moved to the area, 30<sup>th</sup> Street and Neal Ave. were completely covered with frogs in the spring of each year. There were so many it was slippery, like being on ice. While that's declined a lot in the last 15 years, she said the point is there's still a lot of wildlife out there and they serve a purpose.
- Cultural Resources – Evan reported the team completed a full study of historic structures and archaeological resources and, on October 20, 2017, the FAA submitted a determination of “no historic properties affected” to the State Historic Preservation Office (SHPO). On December 28, 2017, the SHPO issued their concurrence with the FAA determination. This means there should be no issues with historic properties for the project. They did instruct that any trees surrounding potentially historic building foundations be hand-cut to avoid disturbance of those foundations. Apart from that, there were no other mitigation measures they indicated were necessary.

- Farmlands – As of the last CEP meeting, the project team was consulting with US Department of Agriculture to determine the significance of effects to farmlands. There are 40-50 acres of farmlands that will be taken out of production associated with the runways, taxiways and the realignment of 30<sup>th</sup> Street N. The findings from the USDA indicate that those impacts are not considered significant when using their scoring criteria, which means there is no required mitigation for those impacts to farmlands.
- Land Use – Wildlife Attractants – On October 18, 2017, Mead & Hunt’s wildlife biologist completed field observations. He spent two days out on the airport observing deer, waterfowl and other wildlife. He issued those findings to USDA-Wildlife Services, which is the branch of USDA that works with airports to minimize and mitigate wildlife hazards. On January 3, 2018, USDA-Wildlife Services issued a letter stating the project is not likely to increase wildlife hazards at the airport. Evan noted this is important from the standpoint of the pollinator habitat discussion during tonight’s meeting in the sense that there are wildlife hazards present at the airport today, and there will be hazards present in the future. It’s really a matter of balancing the different wildlife hazards and identifying ways to mitigate for those hazards. The USDA-Wildlife Services’ letter acknowledges there are hazards today and there will be hazards tomorrow but this project is not going to increase those hazards, and if the airport implements mitigation measures, wildlife hazards could potentially be reduced.
- Water Resources
  - Wetlands – The team submitted its wetland delineation report to the Valley Branch Watershed District. They convened a technical evaluation panel, which consists of several different agencies. The Washington Soil & Water Conservation District, Minnesota Board of Soil & Water Resources, Minnesota Department of Natural Resources and U.S. Army Corps of Engineers all sit on that panel. The panel reviewed the delineation report and approved the wetland boundaries and types. Evan pointed out this does not mean the project is permitted from a wetland standpoint; the MAC will need to go through a permitting process under the Clean Water Act and the Minnesota Wetland Conservation Act. This will happen following the environmental review process; at that time, the exact impacts will be determined. He noted there’s an estimate of what these impacts are in the environmental review document. There’s additional work that needs to be done, but as far as the EA/EAW is concerned, that’s the level of analysis required for an environmental review at this stage – determining what wetlands are out there, what types of wetlands there are, the likelihood of impacts to certain wetlands and what the likely impact is in terms of form and function of wetlands on airport property and surrounding property.
  - Dave Schultz asked if the team was planning to involve the MPCA (Minnesota Pollution Control Agency) and noted that West Lakeland Township is an MS4 Community.
  - Evan responded that the MPCA is not involved in the Wetland Conservation Act process as far as determining what the impacts are and what the required mitigation ought to be, but they are involved in a lot of other areas, such as storm water management, which is the key one as far as airports are concerned. He noted the MAC has a Storm Water Pollution Prevention Plan, which they keep updated, that identifies what they must do as far as testing, manual inspections and other related measures, as well as mitigation measures for minimizing soil erosion associated with storm water. Evan stated the MPCA will likely review the document and, for a project of this magnitude,



they often provide comments. He noted they were invited to the agency scoping meeting held at the beginning of this process and did not receive a response from them; however, he feels confident they will provide comments once the draft is published.

Evan stated that concluded the updates on the environmental effects he wanted to share with the group and pointed them to the 11x17" foldout in their handout and noted this is the summary of environmental effects that will be included in the draft EA/EAW. He mentioned there is a lot of supporting documentation that will also be included. He asked if there were any other questions on the environmental effects before he moved onto the next steps portion of the agenda.

- Mary Vierling said she noticed the MAC had a meeting in December in which they voted to construct a new building on the airport to house salt to keep the runways clear in the winter. She asked for an explanation of where that runoff would go and the impacts it's going to have. Dave Schultz added it's in the environmental piece for 2018 to construct a building for housing salt, sand and other materials. Joe Harris clarified it may be listed in the CIP as an out-building for salt, but the primary use would be for storing sand. He said that sand is currently kept in their equipment storage facility but takes up quite a bit of space, so this would be an out building to have it stored in a separate facility. He also noted that because salt is corrosive to aircraft, it's not used at airports. Dave replied that's what he thought, so he found it odd to be listed on one of the MAC's environmental documents. Joe said he'd make sure that got corrected in those documents.
- Dave Schultz noted that on one presentation slide the railroad was highlighted. Evan said yes, the railroad was identified by Mead & Hunt's historians as potentially eligible for the National Historic Register because that railroad corridor has a significant relationship with the history of the Twin Cities. He said that railroad corridor supported a lot of the commerce that built the Twin Cities. However, he noted, it is not affected by the project, and the SHPO agreed with that. But, because it's within the area of potential effects, it has to be identified as part of the process. The SHPO has not required any further analysis related to it because it's not affected by the project.
- Kent Grandlienard joked that the railroad is the only one with more power than the MAC.
- Commissioner Madigan said that Mary asked at the last meeting about visual screening mitigation measures along the road and wanted to know if anything further has been done with that. Evan responded that the team has looked at a lot of different ideas for screening – such as fencing or trees. The conclusion—and what the environmental document will say—is that there are options for minimizing visual effects if that is perceived as an issue. He noted there are fencing options available that are tall enough and made of the right materials that would prevent the airport lighting from being an issue for nearby automobile travelers. Another recommendation for further analysis during the design process is light baffles that channel the light to just the areas needing it. Those are the two key recommendations for physical, on-the-airfield improvements that could help minimize the visual effects of the lights. The third is an operational improvement, which is setting up the lights so they're only on when the pilots truly need them and could be keyed on and/or get changed to full intensity remotely by pilots when needed. There would be three settings (low-, medium-, and high-intensity) that can be remotely activated as needed. He said, that way the lights would only blink or be at full intensity when they're absolutely needed. This is another mitigation measure the document is recommending.

Evan then went over the requirements for public review and public hearings for federal environmental assessments (EAs) and state environmental assessment worksheets (EAWs). He noted that the federal requirements apply because the FAA is the responsible federal agency for the EA, the requirements are based on their orders and guidance. FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, lays out all the requirements regarding circulating environmental documents, the length of review period, how to engage people and how to interact with the other federal agencies, etc. That order says the draft EA must be available for public review and the notice of public hearing should be published at least 30 days before the hearing. He said the team is making sure it complies with these requirements and will have all the notices in place according to this timeframe. On the state side, they have a similar requirement for a 30-day period for review and comment after the notice is published for availability of the document. The responsible government unit (in this case the MAC) *may* hold one or more public meetings but they are not required to. Evan noted that there have been several public meetings throughout this process and this public hearing is the more formalized opportunity for input under the federal regulations. The state regulations do not define specific timing for the public notice in advance of the meetings, just that it should be “reasonable.”

Evan said, based on those regulations, the timeline the team has established is as follows:

- February 6: At MAC Planning, Development & Environment Committee’s regular monthly meeting, recommend the Draft EA/EAW be published
- February 20: If the PD&E Committee accepts MAC staff’s recommendation to publish the Draft EA/EAW, approval will be requested of the MAC Board of Commissioners to publish the Draft EA/EAW effective as soon as possible
- February 26: Target date to publish Draft EA/EAW, if all previous steps receive proper approval in the anticipated timeframe listed. This date is based on the publication schedules of the various publications the notices will appear in.
  - Once the notices go out, the Draft EA/EAW, including appendices, will be available for download on the project website.
  - Hard copies will also be placed at the Lake Elmo City Hall, Lake Elmo Public Library and Baytown Community Center.
  - Publications where notices will be placed include Minnesota State Register, St. Paul Pioneer Press, Stillwater Gazette, Oakdale/Lake Elmo Review and Minnesota Environmental Quality Board (EQB) Monitor.
  - The notice will cover both the availability of the draft document and the public hearing.
  - A notice will also be distributed to the project email subscription list.
  - Relevant federal, state, and local resource agencies will be notified via email with hard copies made available upon request.
- February 26-March 28: Required 30-day review period prior to the public hearing
- Early April: Hold public hearing. Date and location TBD.
- Mid/Late April: Close public comment period. The team will allow an additional 15 days for public comment after the public hearing.

Evan then went over the ways the public can comment on the document:

## Meeting Minutes

- Spoken comments will be put on the record at the public hearing
- Written comments can be submitted via email to [ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org), via postal mail to the MAC Environment Department (address on the project website), or in-person at the public hearing.

Evan stated all the spoken and written comments received during the comment period will be published in the final environmental document and responded to in the document. Similar comments on a common theme may be responded to collectively.

Stephen Buckingham asked how the comments would be recorded at the public hearing. He asked if it would be a court reporter. Evan responded yes there will be a court reporter.

Evan wrapped up the presentation with the public hearing format and guidelines:

- Hearing format
  - Hearing is a formal public hearing, so the MAC Planning, Development & Environment Committee will act as hearing officers.
  - A court reporter will be present to prepare a transcript of the proceedings.
  - An audio recording will also be made.
  - A half-hour open house will be held prior to the hearing, similar to the other public meetings. This will allow attendees who have not been involved throughout the process to learn about the project prior to the hearing.
  - A short presentation will be given prior to opening the hearing.
- Hearing guidelines
  - Anyone may fill out an “I wish to speak” slip and approach the podium.
  - Speakers will be asked to observe a time limit to allow everyone to speak.
  - Spoken comments will not be responded to during the hearing. He noted this is different from the previous public meetings where there was Q&A and more of a dialogue. During the hearing it’s just public comments for the record.
  - Written comments will be accepted up to 15 days following the hearing.

Evan stated that after the public comment period, the team will take some time to take stock of what they’ve heard, and then will reconvene the CEP for one last time before publishing the Final EA/EAW. The final CEP meeting will provide an opportunity to discuss an overview of the public comments received and the MAC/FAA responses, as well as a final opportunity for the CEP’s input and discussion.

Evan then opened the meeting for CEP discussion.

- Kent Grandlienard asked if Evan had any idea how large that Draft EA/EAW document would be, as he wants to get either a link or the document posted on the township website. He asked if it would be better to just link to the MAC’s website. Evan responded the main portion of the document would be about 100 pages, but the appendices add about an additional 1,000 pages. He said the project website was established to make it as easy as possible to share the information with the public and told Kent to let the team know how they can help to get the document linked on the township website from the project website. Chad Leqve added that linking to the document on the MAC’s website is typically what other communities have done so the township doesn’t have to worry about storing and hosting it on their own server, as it will be a very large document.

## Meeting Minutes

- Dave Schultz said don't make it difficult to find the document from the MAC website. Chad concurred and said it will be straightforward to find it on the project website.

Upon no further CEP discussion, Evan opened the 10-minute public comment period for anyone from the audience wishing to speak. Upon hearing none, he closed the meeting at approximately 6:50 p.m. He thanked everyone for attending and said he looked forward to seeing them at the public hearing.





# Lake Elmo Airport

## Environmental Assessment (EA)/ Environmental Assessment (EAW) Worksheet



January 16, 2018 – Community Engagement Panel Meeting #5  
Environmental Effects & Draft EA/EAW Publication Updates



# Agenda

- Environmental effects update
- Draft EA/EAW publication and public comment period timelines
- Plan for soliciting, documenting, and incorporating public comments
- Public hearing format and guidelines
- Panel discussion
- 10-minute public comment period



# Environmental Effects Update

- Biological resources
- Cultural resources
- Farmlands
- Land use / wildlife hazards
- Water resources





# Biological Resources

- **December 7:** US Fish & Wildlife Service concurred with FAA finding of “may affect, not likely to adversely affect” threatened and endangered species.
- USFWS suggested MAC consider managing a portion of airport property as pollinator habitat. MAC is considering the following to determine whether to pursue this idea:
  - Benefits
  - Risks
  - Costs
  - Potential partnerships
  - FAA input





# Cultural Resources

- **October 20:** FAA submitted determination of “no historic properties affected” to State Historic Preservation Office (SHPO).
- **December 28:** SHPO issued concurrence with FAA determination. Trees surrounding potentially historic building foundations to be hand-cut to avoid disturbance.

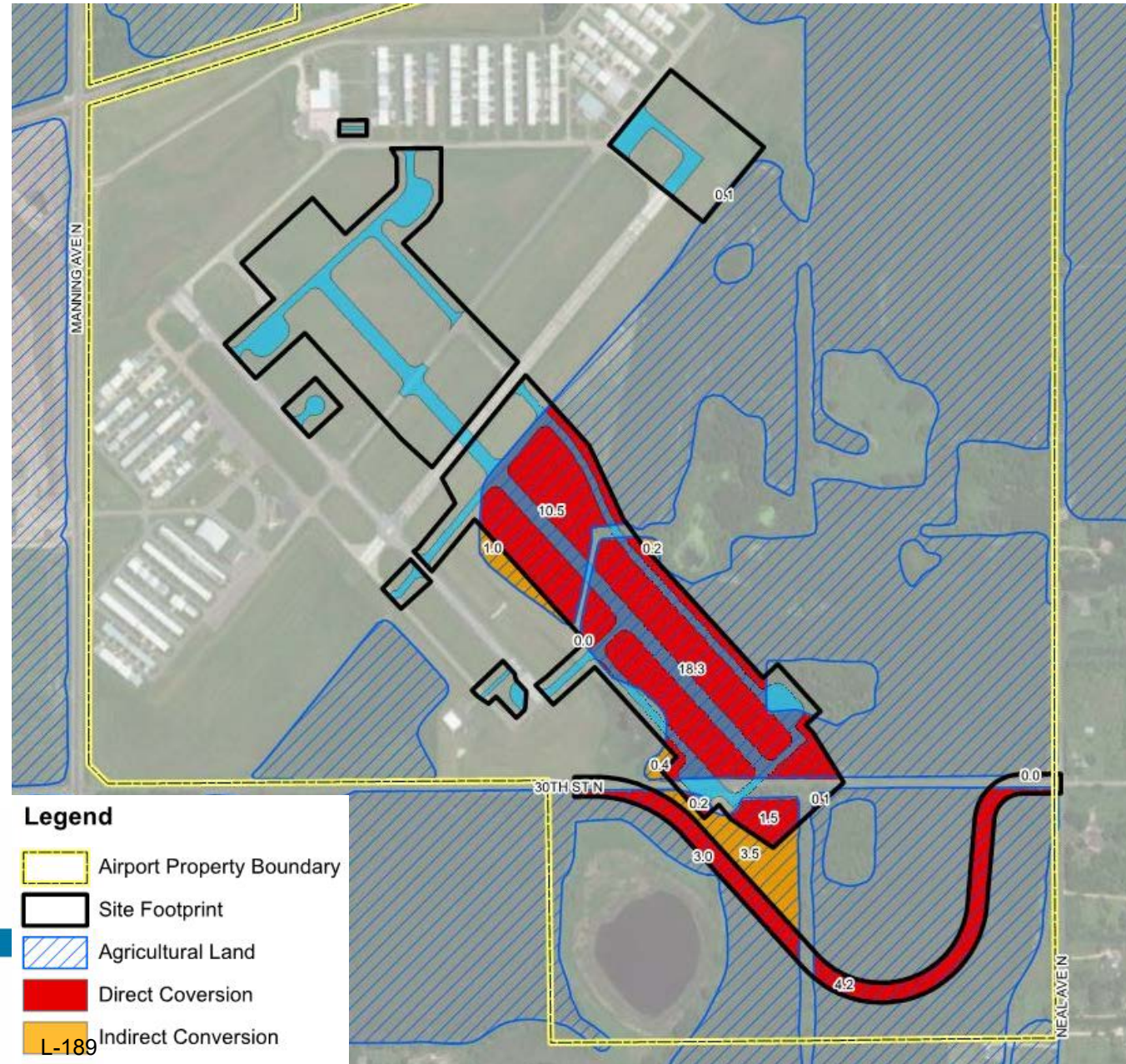


Figure 20. 1964 aerial photo of general project area and locations of 21WA0119 and 21WA0120 (Regents of the University of Minnesota 2017).



# Farmlands

- **November 14:** U.S. Department of Agriculture completed Farmland Conversion Impact Rating calculations
- USDA findings indicate the preferred alternative would not have significant impacts to farmland





# Land Use / Wildlife Attractants

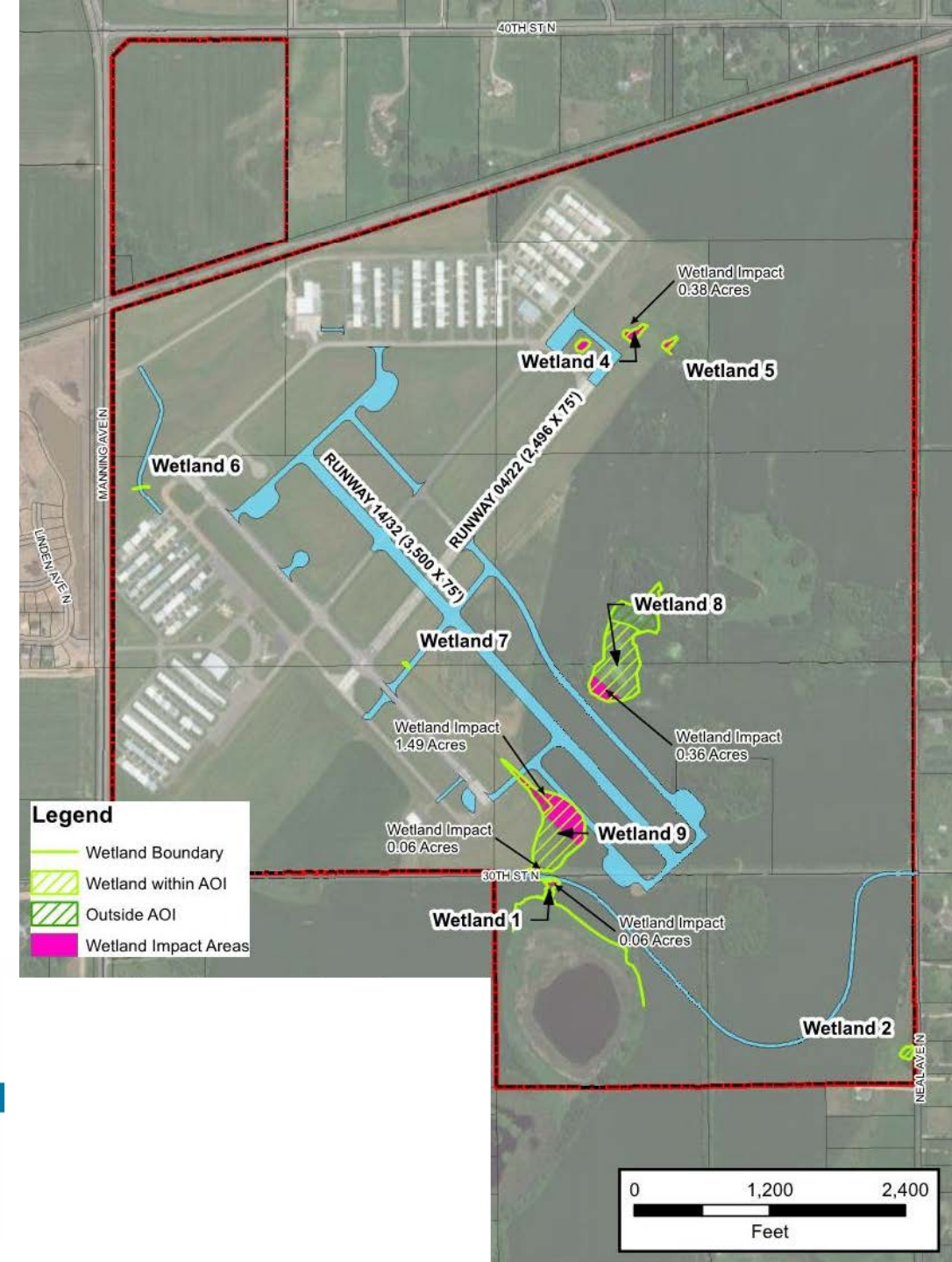
- **October 18:** Mead & Hunt wildlife biologist completed field observations.
- **November 6:** Mead & Hunt findings submitted to USDA Wildlife Services.
- **January 3:** USDA Wildlife Services issued letter stating that the project is “unlikely to increase wildlife hazards” at the airport.





# Wetlands

- **November 9:** Valley Branch Watershed District issued Notice of Decision approving wetland boundaries and types identified by Mead & Hunt.
- Notice of Decision was issued in consultation with:
  - Washington Soil & Water Conservation District
  - Minnesota Board of Soil & Water Resources
  - Minnesota Department of Natural Resources
  - U.S. Army Corps of Engineers
- Exact impacts and required mitigation to be determined during project permitting and design.



Summary of Environmental Effects (FINAL DRAFT)				
Environmental Impact Category		Impacts: No-Action Alternative	Impacts: Preferred Alternative	Required Permitting/Mitigation & Associated Actions
Air Quality		None	Minimal impacts during construction	Implement EPA-recommended best management practices (BMPs) and control strategies during construction.
Biological Resources (including fish, wildlife, and plants)		None	Tree removal	<ul style="list-style-type: none"> <li>• Tree removal to occur during NLEB dormant season (October 1 – April 30).</li> <li>• Implement April 2015 USFWS/USDOT NLEB avoidance and minimization measures.</li> <li>• Implement MnDNR Blanding's turtle avoidance measures.</li> </ul>
Climate		None	None	None
Coastal Resources		NA	NA	None
DOT Section 4(f) Lands		NA	NA	None
Farmlands		None	42.28 acres directly converted	None
Hazardous Materials, Solid Waste, and Pollution Prevention		None	None	Dispose of construction materials and solid waste in accordance with state and local laws.
Historic/Architectural & Archeological Resources		None	None	Hand cut trees near archeological building foundations.
Land Use	Residential	Potential zoning conflicts	Potential zoning conflicts	Convene Joint Airport Zoning Board (JAZB) to develop an Airport Zoning ordinance.
	Ground Transportation	RPZ conflicts	Increased travel time on 30 <sup>th</sup> Street	None
	Wildlife Attractants	Wetlands near runway approach	Wetlands near runway approach	Use FAA-approved seed mixes in turf grass areas.
Natural Resources and Energy Supply		None	None	None
Noise and Compatible Land Use		None	None	Update voluntary noise abatement plan and hold educational briefings with pilots.
Socioeconomics, Environmental Justice, and Children's Health & Safety		None	None	None
Visual Effects (including light emissions)		None	Existing light system relocations and new light systems	<ul style="list-style-type: none"> <li>• Install light baffles for REILs.</li> <li>• Implement low, medium, and high intensity light settings to reduce frequency of light emissions.</li> </ul>
Water Resources	Wetlands	None	2.36 acres direct wetland impact	<ul style="list-style-type: none"> <li>• Compensatory Mitigation Plan (assume impact will be banked).</li> <li>• USACOE 404 Army Corps Permit and Compliance with Minnesota Wetland Conservation Act.</li> <li>• MnDNR Public Waters permit.</li> </ul>
	Stormwater	None	12.6 acres increased impervious area	<ul style="list-style-type: none"> <li>• Stormwater Pollution Prevention Plan.</li> <li>• Onsite Best Management Practices.</li> <li>• MPCA CWA Section 401 Water Quality Certification and NPDES permit.</li> <li>• VBWD permit.</li> </ul>
	Floodplains	None	0.06-acre wetland fill in floodplain	VBWD permit
Cumulative Impacts		No substantial impacts	No substantial impacts	None

# Federal/State Public Review & Hearing Requirements

- Federal EA requirements per FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*
  - Draft EA must be available for public review and notice of public hearing should be published at least 30 days before the public hearing.
- State EAW requirements per Minnesota Administrative Rules, Chapter 4410
  - A 30-day period for review and comment on the EAW shall begin the day the EAW availability notice is published in the EQB Monitor.
  - The responsible government unit (in this case, MAC) may hold one or more public meetings to gather comments “if necessary or useful.”
  - Reasonable public notice shall be given prior to the meetings.



# Draft EA/EAW Publication Timeline

- **February 6:** Recommend Draft EA/EAW publication to MAC Planning, Development & Environment Committee
- **February 20:** Request MAC Board approval to publish Draft EA/EAW
- **February 26:** Publish Draft EA/EAW
  - The Draft EA/EAW will be available for download via the project website.
  - Hard copies will also be placed in the following locations:
    - Lake Elmo City Hall
    - Lake Elmo Public Library
    - Baytown Community Center
  - Notices will be placed in the following publications:
    - Minnesota State Register
    - St. Paul Pioneer Press
    - Stillwater Gazette
    - Oakdale/Lake Elmo Review
    - Minnesota Environmental Quality Board (EQB) Monitor
  - Notices will also be distributed via the project email subscription list.
  - Relevant federal, state, and local resource agencies will be notified via email with hard copies made available upon request.





# Draft EA/EAW Comment Period Timeline

- **February 26 to March 28:** Required 30-day review period prior to public hearing.
- **Early April:** Public hearing (date and location to be determined).
- **Mid/Late April:** Close public comment period.



# Public Comments

- Spoken comments will be recorded at the public hearing
- Written comments can be submitted:
  - Via electronic mail to [ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org).
  - Via postal mail to MAC Environment Department.
  - In-person at the public hearing.
- All spoken and written comments received during the official comment period will be included in an appendix to the Final EA/EAW.
- Written responses to each comment will be provided in the Final EA/EAW.
  - Similar comments on a common theme may be grouped together and addressed with one collective response.



# Public Hearing Format & Guidelines

- Hearing format
  - The MAC Planning, Development & Environment Committee will act as hearing officers.
  - A court reporter will be present to prepare a transcript of the proceedings.
  - An audio recording will also be made.
  - A half-hour open house will be held prior to the hearing.
  - A short presentation will be given prior to opening the hearing for public comment.
- Hearing guidelines
  - Anyone may fill out an “I wish to speak” slip and approach the podium.
  - Speakers will be asked to observe a time limit to allow everyone to speak.
  - Spoken comments will not be responded to during the hearing.
  - Written comments will be accepted up to 15 days following the hearing.



# Discussion/Questions

- Final CEP meeting to be held following close of the public comment period and prior to publication of the Final EA/EAW.
- Main topic of final CEP meeting will be an overview of public comments and MAC/FAA responses.







Lake Elmo Airport  
Federal EA / State EAW  
Community Engagement Panel  
Meeting #6

May 15, 2018  
6:00 P.M.



**Agenda**

1. Overview of public and agency/government comments
2. Next steps
3. Request for input on stakeholder engagement process



## LAKE ELMO AIRPORT FEDERAL EA / STATE EAW

# Community Engagement Panel

## Meeting #6 Minutes

Baytown Community Center

May 15, 2018

6:00 P.M.

### Panel Attendees

John Renwick  
Marlon Gunderson  
Mary Vierling  
Dave Schultz  
Kent Grandlienard  
Stephen Buckingham  
Chad Leqve  
Neil Ralston  
Michael Madigan

### Representing

Airport Tenant/User  
Airport Tenant/User and City of Lake Elmo Resident  
West Lakeland Township Resident  
West Lakeland Township Supervisor  
Baytown Township Supervisor  
Baytown Township Resident  
Metropolitan Airports Commission Director of Environment  
Metropolitan Airports Commission Airport Planner  
MAC Commissioner District F

### Other Attendees

Dana Nelson  
Brad Juffer  
Evan Barrett

### Representing

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Mead & Hunt

### Public Observers

Mick Kaschmitter

### Resident of

West Lakeland Township

### Absent Panel Members

Ben Prchal  
Keith Bergmann  
Ann Pung-Terwedo  
Robin Anthony

### Representing

City of Lake Elmo Planner  
City of Lake Elmo Resident  
Washington County Public Works Planner  
Greater Stillwater Chamber of Commerce

*The attached report represents this writer's interpretation of items discussed during the meeting. Any corrections or additional information should be brought to our attention for clarification.*

### The purpose of the meeting was to:

- Present an overview of public and municipal/agency comments on the Draft EA/EAW.
- Share information with the CEP members on the next steps in the environmental process.

## Meeting Minutes

- Request feedback on the stakeholder engagement process.
- Continue to equip CEP members to be the point of contact for information sharing, both to and from the community and MAC, and to respond to inquiries from their constituent groups.

### **The presentation was as follows:**

A copy of this presentation can be found at: <https://metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-CEP-Meeting-6-Presentation-05-15-2018.aspx>

Evan Barrett, Mead & Hunt (MAC's consultant) Project Manager for the environmental review process, opened the meeting by welcoming everyone and thanking them for coming to the sixth and final meeting of the CEP. He recapped that the last CEP meeting was held in January, and since that time the project team published the Draft EA/EAW at the end of February, held the public hearing on April 4<sup>th</sup>, and closed the public comment period April 19<sup>th</sup>. He noted it's been about 3 ½ weeks since the public comment period closed, and a lot of comments came in during the last week, so the team has been busy cataloging and responding to comments. He mentioned this work is still ongoing.

Evan then outlined the agenda for the evening. He said he would provide an overview of the comments received from the public, municipalities and agencies, cover next steps in the process, and then turn it over to Dana Nelson, who would seek the CEP's input on the stakeholder engagement process.

Evan reported the following:

- Public comments were received from 74 individuals (written and verbal). Of those, 46 oppose the project, 26 support the project and 2 were neutral or difficult to determine a position.
- 16 individuals spoke at the public hearing
- 66 individuals submitted written comments
- 74 total written comments were submitted (several individuals submitted multiple written comments)
- Many of the topics were on themes heard previously during the long-term comprehensive plan (LTCP) process and earlier in the EA/EAW process. He referenced the list of frequent public comment topics shown on slide 4 of the presentation. He also stated the list is not comprehensive and that the team is still working on sorting through and grouping the comments and determining which can be addressed with a common response and which are unique and will need an individual response.
- Many comments were several pages long and so long comments addressing multiple concerns were broken down into sub-comments, so the team can be sure each sub-comment is responded to with either a general or individual response.
- The team received letters or emails from nine government agencies or local governments. All had substantive comments. Evan provided a brief overview of each:
  - West Lakeland Township – Most comprehensive comment letter received. This letter included comments on almost every aspect of the document, which the team is working to address. The rest of the agency/government comments were specific to that agency's area of expertise/interest/jurisdiction.
  - Valley Branch Watershed District (VBWD) – This letter focused on compliance with Watershed District rules and regulations related to wetland sequencing, wetland buffers, storm water management and floodplain management. He noted there were



- several technical clarifications the team is working to integrate into the report in response to these comments.
- Washington County – Comments were limited to information about their zoning ordinances and enforcement authority for zoning, as well as a general comment about the drainage plans for the project being subject to the permitting process and that they would review them at that point in time.
  - Washington Conservation District – Comments were related to several different environmental issues, including the Rusty-Patched Bumblebee proposal, salt and chemicals used on the airport, and updated land use data. They also had comments about wetlands and storm water similar to the VBWD and Washington County.
  - Minnesota Department of Agriculture – Included one comment related to uneconomic remnants of ag land, which are areas that may become severed, isolated or triangulated as a result of the project. They were interested specifically about the area south of 30<sup>th</sup> Street, and the team is working to supplement the analysis in response to that comment.
  - Minnesota Department of Transportation – Included a comment related to 30<sup>th</sup> Street and the fact that some speed limits were shown in the draft report. Evan stated the team would clarify in the response to comments that MnDOT will have to conduct a speed study to identify approved speed limits.
  - Minnesota Department of Natural Resources (DNR) – Included comments on several different environmental issues within their purview, such as subsurface geology, aquifers under the Airport, public waters on and near the airport, and mitigation strategies for the Blanding’s Turtle, which is a state-listed threatened species.
  - Minnesota Pollution Control Agency (MPCA) – As is typical for this type of project, the MPCA notified the MAC that a water quality certification will be required prior to construction, which will include an anti-degradation assessment because the Airport drains to Down’s Lake which MPCA has identified as an impaired water body under the Clean Water Act.
  - U.S. Environmental Protection Agency – Included two comments. One was on the groundwater monitoring wells. Evan explained the project will not affect any wells, and if any monitoring wells were closed in the future, all applicable regulations would be followed. Their other comment was to recommend that the MAC continue consultation and coordination with any appropriate state agencies such as the DNR and MPCA.
- Evan then discussed next steps in the process:
    - The team is currently incorporating responses to all those comments—public, local government and agency—into a *Response to Comments* document that will be published with the final EA/EAW document.
    - Once that’s done, the final actions that will need to occur to complete the EA/EAW process are as follows:
      - The FAA and MAC will coordinate their responses to comments prior to publication of the final EA/EAW document – this is ongoing.
      - The FAA, as the lead federal agency for the EA, will issue a finding on the EA. Timing is to be determined. Notices of the finding will be published in appropriate publications, such as the Federal Register.

- The MAC, as the responsible governmental unit for the EAW, will issue a determination on the EAW. There will be discussion of that determination at a future MAC Planning, Development & Environment Committee meeting. A formal determination will occur at a future MAC full commission meeting. The e-news subscription list and CEP will receive a notice once this has been added to the agenda for either of these meetings.
- Once the official determination has been made by the MAC full commission, a notice will be published in the EQB Monitor.
- Evan noted timing is still TBD for these final steps in the process but expects it'll be a few more months until the process is complete.

Evan then turned the meeting over to Dana Nelson.

Dana asked if there were any questions before she moved to the next topic. Upon hearing none, Dana proceeded, noting that when this process started about 15 months ago, in February 2017, the team had mentioned they were undertaking a new, expanded stakeholder engagement process for this EA/EAW and requested regular feedback along the way. She stated the team wanted to offer one last feedback opportunity for the stakeholder engagement process. She said this is also informing future processes that the MAC will be taking for other airport projects, such as the Crystal environmental review and the MSP LTCP. She noted they will take lessons learned from this process to incorporate into those stakeholder engagement programs. She noted that earlier tonight she sent a questionnaire to the CEP members and asked them to fill those out and send them back to her. She acknowledged the significant amount of time, effort and dedication the CEP members expended toward the process and thanked them for their participation. She also thanked Kent and Baytown Township for use of the Baytown Community Center space for many of the CEP meetings. She also noted the feedback provided on the form will not be part of the project record nor will it in any way change any comments anyone already has on the project record. For example, if someone provides positive feedback on this form, it will not endorse the project; likewise, if someone has negative feedback on the stakeholder engagement process, it will not alter the position of any public comments provided on the project. Dana offered paper copies of the form and told the CEP it was their choice to fill out a paper copy or the electronic copy sent earlier in the day. She said the form can either be filled out now and returned to her tonight or emailed or mailed to her in the next few weeks. She stated the form was also available to members of the public in attendance at tonight's meeting.

### **The CEP discussion was as follows:**

Commissioner Madigan asked whether the team could remind him how many trees would be removed. He said there was a comment at the last meeting that a white oak would be removed. He further stated, obviously, all trees are valuable, but can you comment on whether those types of trees are within the area marked for tree removal, and what mitigation measures are being considered? Evan responded that on airport property, the document states that for the preferred alternative, the MAC is removing 20 acres of trees. He noted that some of those acres are fairly heavily forested—so basically clear-cut areas—but the majority of the acreage consist of scattered, individual trees. He said it is difficult to quantify the exact number of trees. The team used an acreage approach to give a sense of how many

trees on the Airport would be removed. Land cover data suggests there are 35 total acres of trees on airport property, and they would be removing close to 20, so a little over half of the trees that are on airport property. He said the team took a more targeted approach for off-airport property trees and noted a great deal of effort from the LTCP process and ALP update went into this to look at individual trees and identify specifically which trees may or may not need to be removed. This effort identified about a dozen trees off airport property that may need to be removed as part of the project. Neil Ralston noted they were all off the crosswind runway (Runway 04/22) ends. Kent Grandlienard asked if most of them were off of old Neal Avenue, that was vacated? Neil clarified that several trees were in the approach to Runway 22, just north of the railroad track. Neil also said the team had identified some areas where, if trees were growing quickly, they would have to look at removing them during project design, but there were no guarantees they would have to be removed. He stated they would look more closely at specific trees and tree growth rates. He referenced a specific homeowner's tree that was discussed at the public hearing and suggested that if it was an older, legacy tree, he suspected it wasn't growing very quickly and that, unless it was growing very quickly, it likely shouldn't be an issue. However, he noted, for the purpose of the EA/EAW, they needed to identify areas of potential tree removal that would need to be looked at closer as the project progresses, but to this point, they have not determined with certainty that specific trees must come down.

Evan noted that discussion hopefully answered the first part of Commissioner Madigan's question. The second part was related to mitigation. He said that trees are a difficult thing to mitigate for (i.e. replace) on an airport because they grow and may become hazards. He said the team looked at possibly keeping some of the trees they proposed to remove, but determined that, in order to build the new runway, the FAA was going to require those trees to be removed. He stated the team had conversations with the FAA about that, and that's what resulted in the team taking a close look at all the off-airport trees, because initially the team was not proposing to remove any trees off airport property—only ones on airport property. He noted that as far as mitigation is concerned, there is no requirement under state or federal law to replace trees that are cut down. However, there is potential that during the permitting process for the wetland impacts—he noted that a small portion of the tree removal will occur in the wetlands—permitting authorities may require some sort of mitigation in terms of replacement of trees that are taken down in wetlands. He stated that as for the trees in the upland areas, there are no requirements for mitigation under any regulation he's aware of; therefore, the team has not proposed any mitigation or replacement. He said the team is taking a careful approach to the northern long-eared bat that may be in some of those trees (it's not been documented that they are in those trees), and they will follow mitigation measures to remove those trees at a certain time of the year to avoid any possible bat roosts that could be in those trees. Commissioner Madigan clarified that even if it's not required by law, they could be mitigated and replanted, correct? Evan confirmed they could. Neil added that the goal is to take a harder look at specific areas and only take action on trees that are likely to penetrate a protected approach surface to a runway within a zero-to-five-year timeframe.

Chad Leque suggested Evan discuss some of the comments received regarding trees and shielding airfield lighting and the measures the EA/EAW outlined to mitigate that. Evan reported that the team received several public comments about airfield lighting and trees in combination. Some neighbors feel the trees provide a buffer for their property from those lights. He said the team had heard that at previous CEP and public meetings as well and noted that, partially because of that, the team investigated different strategies for reducing the effects of any new or relocated lights. These included light baffles, certain types of fencing, certain settings on the lights, and notifying pilots of the preferred

light usage settings (i.e., turning off or to a lower setting when not in use). He noted the key concern the team has heard about the lights is that it's not just that the lights are moving to a new place, it's that they're being moved AND trees that are perceived to shield those lights are being taken down.

Mary Vierling stated she noticed today that they're counting traffic on 30<sup>th</sup> Street and asked if this was a County traffic count. Kent Grandlienard stated it must be because they're counting it on Northport, too, and he confirmed Baytown Township is not doing it, so it has to be the County. He said they did it a couple of years ago as well. He speculated they are trying to determine what the impacts of the future Manning Ave. construction is. Dave Schultz stated it's also related to a jurisdictional study on roads to determine who's going to own the road.

Mary asked whether the MAC has engaged with any neighbors or residents regarding home buyouts, as she had a couple neighbors who dropped out of sight. Neil confirmed there were no property acquisitions proposed as part of this project. Evan stated it certainly would have been brought up as part of this process if that was being proposed. Mary stated she thought there were several homes that had been earmarked for acquisition. Neil stated that no homes that had been earmarked for acquisition. Dana Nelson asked if Mary meant homes in the State Model Safety Zones. Mary said they were the six homes in one and she thought five in another, and that she was referring to homes within the State Model Safety Zones. Dana confirmed the MAC is not proposing to acquire those. Commissioner Madigan suggested the issue there was that if people [in the State's Model Safety Zones] wanted to increase the height of their houses, they couldn't? Evan responded that he recalled a discussion with Commissioner Madigan and a homeowner regarding this after the public hearing. He said the team used the State's Model Safety Zones to evaluate the potential land use impacts to residential properties associated with the project. Those State Model Zones are based on the length of the runway and the surfaces coming off the end of the runway. However, he said, once the zoning process is underway, there's an opportunity to propose a custom or modified zoning ordinance. Therefore it is not certain what restrictions would be imposed on those properties, but the State Model Safety Zones provided a way to compare alternatives and their relative impacts. Regarding those zones, in Zone A, typically construction of new structures is prohibited. In Zone B, typically there's a density restriction. He further stated there's a lot of low-density development off the ends of the runways, particularly off the end of Runway 32 southeast of the Airport. He noted it's likely that, even if the State Model Zones were enacted, the current density and housing in that area would not exceed the requirements and therefore there wouldn't be an issue unless a homeowner wanted to subdivide their property or something like that. He expressed that this may not have been adequately explained in the document and stated that the particular individual he'd talked with after the public hearing had also submitted a written comment on this topic, and so there would be a response to that comment when the final document is issued.

Dave Schultz apologized for arriving late but asked about the timeline for responses to comments. Evan responded that prior to Dave's arrival, he'd explained to the CEP that it's been about 3 ½ weeks since the public comment period closed, and the team received a lot of comments in the last week of the comment period. He said that the team has been working hard to develop responses in a timely fashion while also making sure they are addressing the specific comments being made. That being said, Evan noted the team is looking at getting the project wrapped up in the next few months. He noted there are still a lot of things that need to occur, such as finalizing the responses, coordination between the FAA and MAC, FAA must make its determination, and MAC must make its determination. He said there is not an exact timeline at this point, but noted the team is working as quickly, completely and effectively as it can, taking all those things into consideration. Dave asked, so probably another couple months from



## Meeting Minutes

today? Chad Leqve responded hopefully by July or August, but noted that, as Evan said, the team will make sure to keep everyone updated through the communication channels that have been established so people will know in advance. Chad also stated that as soon as the project advances, the MAC will provide information on when the state environmental review process will play out at the MAC Planning, Development & Environment Committee meeting, and ultimately a full MAC commission meeting, as well as any developments that occur on the federal side with the FAA.

Evan asked if there were any other questions before adjourning. Upon hearing none, he echoed Dana's sentiments and appreciation for the group's participation, time, energy and input in this process. He recognized that some of the meetings may have been difficult but said, ultimately, the group's participation makes the process better. He stated that, regardless of whether everyone agrees on the outcome, there's a benefit to having the conversation. He thanked everyone and adjourned the meeting at approximately 6:35 p.m.

# Lake Elmo Airport

## Environmental Assessment (EA)/ Environmental Assessment (EAW) Worksheet



May 15, 2018 – Community Engagement Panel Meeting #6  
Public Comment Overview & Next Steps

L-207



# Agenda

- Overview of public and agency/government comments
- Next steps
- Request for input on stakeholder engagement process



# Public Comment Overview

- 74 individuals provided spoken and/or written comments during the public comment period
  - 46 oppose the project (62%)
  - 26 support the project (35%)
  - 2 were neutral or position could not be reliably identified (3%)
- Spoken comments
  - 16 individuals spoke at the public hearing
- Written comments
  - 66 individuals submitted written comments
  - 74 total written comments were submitted (several individuals submitted multiple written comments)





# Frequent Public Comment Topics

- Airport use by larger aircraft
- 30<sup>th</sup> Street realignment
- Use of alternate airports
- Aircraft noise
- Airfield lighting
- Safety zoning/incompatible land use
- Purpose and Need
- Economic impacts
- Property value
- Wildlife habitat
- Groundwater contamination
- Tree removal
- Operations estimates
- Importance of airport
- Pilot/community relations
- MAC/community relations
- Sources of funding
- Unique comments



# Agency & Local Government Comments

- Written comments were submitted by nine local governments/agencies
  - West Lakeland Township
  - Valley Branch Watershed District
  - Washington County
  - Washington Conservation District
  - Minnesota Department of Agriculture
  - Minnesota Department of Transportation
  - Minnesota Department of Natural Resources
  - Minnesota Pollution Control Agency
  - U.S. Environmental Protection Agency



# Next Steps

- Incorporate responses to public, local government, and agency comments into the EA/EAW
- Final actions necessary to complete the EA/EAW process
  - FAA to issue finding on the Federal Environmental Assessment
    - Notice of finding to be published in the Federal Register
  - MAC to issue determination on the State Environmental Assessment Worksheet
    - Discussion to occur at a future Planning, Development, & Environment committee meeting
    - Formal determination to occur at a future MAC Full Commission meeting
    - Once made, notice of determination to be published in the Minnesota EQB Monitor



# Thank You for Your Participation

- Please share your thoughts on your experience.
- Your input will be used to improve MAC's stakeholder engagement processes.
- Completed questionnaires can be:
  - 1] Left with us at today's meeting
  - 2] Sent via e-mail to [dana.nelson@mspmac.org](mailto:dana.nelson@mspmac.org)
  - 3] Sent via mail to:

MAC Environment Department  
c/o Dana Nelson  
6040 28<sup>th</sup> Avenue South  
Minneapolis, MN 55450







# Lake Elmo Airport EA/EAW Public Events Meeting Documentation



The following pages contain agendas, handouts, minutes, informational boards, and presentation slides from public events held on the following dates:

- May 11, 2017
- August 17, 2017
- November 6, 2017

**PUBLIC NOTICE  
LAKE ELMO AIRPORT  
ENVIRONMENTAL ASSESSMENT FOR PROPOSED AIRFIELD IMPROVEMENTS  
PUBLIC INFORMATION MEETING**

The Metropolitan Airports Commission (MAC) has commenced a joint Federal Environmental Assessment (EA) / State Environmental Assessment Worksheet (EAW) to study the environmental effects of proposed airfield improvements at Lake Elmo Airport. These improvements are identified in the Airport's recently-completed Long-Term Comprehensive Plan. In accordance with its responsibilities under the National Environmental Policy Act (NEPA), the Federal Aviation Administration (FAA) requires the MAC to complete an EA in order to obtain federal funding for the improvements. The MAC is also responsible under State law for completing an EAW, which will be completed concurrently. During the EA/EAW process, numerous environmental categories will be reviewed. In addition to direct environmental effects, the process will consider the related social and economic effects. The EA process will involve extensive public outreach and opportunities for public involvement, including three public information meetings as the Draft EA is developed, followed by a public hearing immediately after public release of the Draft EA document.

The MAC will host the first public information meeting on:

Thursday, May 11, 2017  
6:00 to 8:00 PM  
Presentation beginning at 6:30 PM

Stillwater High School - 2<sup>nd</sup> Floor Rotunda and Forum Room  
5701 Stillwater Blvd N  
Stillwater, MN 55082

The meeting offers an opportunity for one-to-one interaction with MAC staff in an open house setting with an overview presentation beginning at 6:30 PM. During the meeting, community members can learn more about the proposed airfield improvements, Federal and State environmental processes and regulations, environmental analysis categories, how and why alternatives are considered, the anticipated project timeline, and opportunities for public input.

More information is available on the project website (<https://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx>), including how to receive periodic updates via our e-news subscription program, public event details, public project documents, answers to frequently asked questions, and information on how to provide public comment throughout the process.



## LAKE ELMO AIRPORT FEDERAL EA / STATE EAW

# Public Event #1

## Meeting Minutes

Stillwater Area High School

May 11, 2017

6:00 – 6:30 P.M. – Open house with informational boards

6:30 – 8:10 P.M. – Presentation followed by Q&A

### MAC/Mead & Hunt Attendees

Chad Leque  
Dana Nelson  
Neil Ralston  
Joe Harris  
Melissa Scovronski  
Brad Juffer  
Amie Kolesar  
Shelly Cambridge  
Gary Schmidt  
Mitch Killian  
Michael Madigan  
Evan Barrett  
Laura Morland  
Colleen Bosold

### Representing

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission, Lake Elmo Airport Manager  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
MAC Commissioner District F  
Mead & Hunt  
Mead & Hunt  
Mead & Hunt

Presentation slides and informational boards presented at this meeting, as well as the newsletter and frequently asked questions (FAQs) provided as handouts to the public, are available on the project website at <https://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx>.

### The purpose of the meeting was to:

- Provide background information on the environmental process and the stakeholder engagement plan for proposed airfield improvements at Lake Elmo Airport.
- Respond to inquiries from community members.

### Items discussed were as follows:

Chad Leque, Director of Environmental Programs for the MAC, welcomed and thanked everyone for coming and mentioned one thing he hopes people take away from tonight's discussion is the importance the project team is placing on the concept of collaboration as we go through this process. After introducing himself, Dana Nelson, the Q&A participants (Evan Barrett, Neil Ralston and Joe Harris)



## Meeting Minutes

and additional MAC staff and the MAC commissioner in attendance, Chad provided an overview of the agenda for the evening. Chad asked the audience to provide feedback (positive or negative) and ideas throughout the process, both on the project itself as well as on the format of this public event and what could make the public involvement process better.

Chad Leque began the formal presentation, which included an overview of the MAC's purpose and mission, including the legislative mandate, funding structure and system make-up; the primary role and characteristics of Lake Elmo Airport; a recap of the Lake Elmo Airport Long-Term Comprehensive Plan (LTCP) recommendations; an overview of the environmental review process, including National Environmental Policy Act (NEPA) and Minnesota Environmental Policy Act (MEPA) processes and requirements, and the three levels of environmental review; a brief overview of the components that go into developing a project's purpose and need statement and potential constructs that may go into this project's purpose and need based on the LTCP; an introduction to the alternatives analysis part of the process – they have to be adequate to meet the components of the purpose and need statement, the project team is currently working on determining that suite of alternatives, and each alternative will be developed in sufficient enough detail to adequately assess the costs, operational safety factors and environmental impacts of each; and an overview of the 14 environmental impact categories that will be evaluated.

Dana Nelson then took over the presentation and asked for a quick poll/show of hands on who was in the room as a resident of Lake Elmo (third largest crowd); West Lakeland Township (largest crowd); Baytown Township (second largest crowd); tenants/airport users (a handful of people); Stillwater residents (1 person). She then mentioned that this is a first-of-its-kind effort for the MAC to conduct a stakeholder engagement process of this magnitude and encouraged the audience to provide feedback throughout the process, whether on the meeting format or ideas about the project. The remainder of her presentation focused on the stakeholder engagement plan (SEP) and objectives; the community engagement panel (CEP) role, objectives and composition; the outreach messaging and platforms; and the three other planned public events. She shared that the project website is <https://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx>.

Chad Leque came back up to discuss the project timeline for the environmental review. It is about a year-long process that is currently planned for completion in May of 2018. A printable schedule is available on the project website as well as a board out in the rotunda showing the timeline.

Chad Leque discussed next steps: the next CEP meeting will be on May 25 at 6:00 p.m. at Lake Elmo Public Library. These meetings are open to the public. At that meeting, we will review tonight's event to see what can be done better and review the comments received tonight. We'll then talk about the purpose and need for the project as well as take a deeper dive on the alternatives analysis. The consultant/technical project team will be getting to work on the alternatives analysis over the coming weeks. At that, Chad opened it up for questions. He said the team would answer questions as best they can but also encouraged people to submit written questions on the comment forms, and offered that the project team would be in the rotunda by the informational boards following the Q&A for anyone who wanted to speak one-on-one.

**The general Question & Answer session that followed is described below.** *(Responses are indicated in italics.)*

## Meeting Minutes

- Can you repeat when the CEP meeting is? *Chad Leque responded it is May 25 at 6:00 p.m. at Lake Elmo Public Library. Is it open to the public? Yes.*
- What is the acreage of the airport? *Chad Leque responded it is 640 acres. Is that just the Baytown parcel? No, that's the entire airport (MAC-owned property). I thought the RPZ extends across Manning Avenue. That is true but MAC does not own property within the RPZ west of Manning Avenue.*
- What is the dollar amount of taxes the MAC pays to Washington County or the City of Lake Elmo? *Joe Harris responded that hangars and operators at the Airport pay a personal property tax based on their lease-hold area. That exact information can be found on the county assessors' website. Approximately \$120,000 in personal property tax is collected from tenants and private businesses who have improvements at the Airport. The MAC does not pay any property taxes to the county or townships.*
- How many people from the MAC live within one mile of the Airport? *[No response/show of hands before next question was asked.]*
- How many pilots live within one mile of the Airport? *[No show of hands, and the questioner concluded no one has an answer for this, but an airport tenant reported that there are some pilots who do, but they are not here tonight. The questioner concluded it was not very many.]*
- What was the original intent of the airport? Do you recall? I remember I was out here in 1964 when Ward Holliday was the airport manager and had a flight school here. *Chad Leque responded that he thought the character of the airport has been primarily the same: a small, GA type facility, which is no different than what we anticipate to be the case as we look through the planning period of this planning process. So, educational and recreational use? Primarily.*
- Do you want to discuss the original charter of the reliever airport system and the fact that it was a specific design to separate traffic – business traffic from the large airport [MSP]? I think that drives a lot of the MAC philosophy, and people might not be familiar with that. *Chad Leque explained that there's a reason why MAC has an airport system: to promote and enhance air transportation within the metro area and regionally. MSP is a major hub airport, major transportation center. Efficient operation of that facility (both from an airside and landside perspective) is predicated on separating the different demographics of traffic the best we can. This means keeping the larger aircraft and commercial operations at MSP, and moving smaller operators to other system airports to provide the infrastructure to accommodate that demographic. In the case of Lake Elmo Airport, that is small, piston-engine, less than 10 seat-type of aircraft, which we anticipate to be the case throughout the planning period. At an airport like St. Paul Downtown Airport, that's more for larger, corporate jets – the 3Ms of the world and those types of operators. It really is a system and each airport has a role within it to make it effective and allow us to provide the services we are mandated to statutorily from an air transportation perspective. But there have been some jets that have come in on this airport? Absolutely – small jets. And you don't deny that this extension is to accommodate more small jets? Chad responded that it's not necessarily fair to say it's to accommodate them. You keep using the word piston. Chad explained the purpose of the extension is to ensure an adequate level of utility of the facility to the type of aircraft that already operate at the airport – to make sure the facility is right-sized for the demographic of operators that are already at the airport. The original intent was not for that. It was for emergency purposes for small aircraft. Chad responded, "I do not believe that is correct." Questioner said "yes it was" and invited Chad to look it up. Neil Ralston clarified that the proposed 3,500-foot runway length is designed for*

*propeller-driven aircraft. Piston and turboprop aircraft are the design aircraft for the airport and a runway of that length. A runway designed for jets would be a lot longer than 3,500 feet.*

- You talk about 26,000 operations. What does that mean? Take-offs and landings? *Chad Leque responded, yes, take-offs and landings.*
- It [the FAQ handout] says “The mix of aircraft using a runway results from the individual decisions made by the pilot, who evaluate the available runway length and the conditions with reference to the performance characteristics of their aircraft.” Why can’t we just say, and be very firm about it, no jets are allowed to land here? We’ve got New Richmond, Downtown St. Paul, Fleming Field, Crystal and a lot of other airports. I’ve been in the area since 1958, and this airport was not made for jets. In selling real estate in the area for 25 years, we were always told, this is to accommodate small aircraft for local people. We’re not looking to invite pilots from other areas; this is for the farmers and residents of Lake Elmo and Baytown Township. Now we’re doing something that’s totally different. We’re worried about the infrastructure for 200 people – which is a concern – but we’re talking now about four different communities with residents in excess of 25,000. There doesn’t seem to be a level playing field here. We’re paying an awful lot of people to study this plan for almost a two-year period. That’s a lot of salaries for two years, a lot of tax money being spent while the citizens of Washington County have gone without roads that have been improved – we’ve all got terrible roads – we’ve been forced by the Metropolitan Council to expand our population by bringing in builders, new homes, city water and sewer that I bet nobody in this room wanted; we’ve had taxes shoved down our throat to pay for improvements we didn’t want, and we’re not getting the roads we need. And I’m not even talking about airport noise. That’s going to be a much bigger complaint for most people here. We’ve had helicopters, airplanes and many other things that are upsetting us. But why are we doing all this for 200 planes that are currently at the airport? Why aren’t we looking at the needs for all these people who live around it? That’s what I don’t understand. Why aren’t we just putting these 200 planes at different airports? Do we need the airport? *Chad Leque explained, in regard to restricting jet operations at the airport, Lake Elmo Airport like every airport in the MAC system and in fact nearly all airports in Minnesota, is a public-use facility. It’s a public transportation asset just like our interstate highway system. We use federal dollars to develop and maintain these facilities as public transportation assets. There are requirements levied upon us as the airport operator if we use federal funds to maintain this public asset. One of those is to provide equal opportunity and access to law-abiding operators to this transportation asset. A lot of the federal regulation that goes to these grant assurance provisions, as well as additional analysis that needs to be done for restrictions at airports in the US, was born out of a national debate around airport noise in this country all the way from airports the size of MSP down to Lake Elmo. It centered on curtailing operations or changing aircraft operations to reduce noise impacts. U.S. Congress said these are public transportation assets and people need access to them. What that means is, our federal funding is predicated on the fact that we operate this airport in a manner that is not an undue burden on interstate commerce or is arbitrary and capriciously managed in terms of equal access to the facility. So we cannot restrict the use of the airport by a legal aircraft that can and wants to fly in and out of that airport, much the same as if somebody who has license tabs on their vehicle wants to drive on a state highway or the interstate system – that’s a public transportation asset that they have access to. Are you saying you can’t restrict a jet? Correct, we cannot. If that jet is a legal jet (which, if it’s flying, it’s legal – more or less), we can’t restrict those operators from coming in*

*and out of this airport. Then maybe we should just shut the airport down. [Several people clapped.] Chad responded, that is a perspective, and explained that the MAC runs into the same issue at MSP, but in a different context. He said, "Sometimes when an issue pops up at MSP, we'll be in a gymnasium of 150-200 people who are mad about nighttime noise around MSP. And they come up with a very reasonable idea, from their perspective, like the one you just came up with: If you're concerned about aircraft noise and the airport bothers you, shut the airport; or, in the case of MSP, close it down at night – don't allow flights into the airport at night. That is one perspective. But the reality is that the MAC has an obligation and a role that includes a lot of different stakeholders. Some of those stakeholders are just like you – a resident around the airport that has concerns with impacts from the airport. The other important stakeholder group that we have is our tenants – people who want to hangar their aircraft at a MAC airport; the family that wants to get a cheap flight to Cancun to go on a trip out of MSP but they want to fly out at 5:00 a.m. so they can get an extra day of vacation. We have a lot of different stakeholders that we, by virtue of the constitution of our organization have to be accountable to. So what we try to do in these processes – and I can't guarantee, I'll be very honest with you, that everybody is going to be 100% satisfied at the end of this process and completely happy with the outcome – but the one thing we are tirelessly dedicated to is making sure we have a process that we're implementing and supporting where we can have these dialogues and do the best we can to find middle ground with all of our varying stakeholders, while trying to meet our legislative mandate as an organization at the MAC. We are not going to solve all of these issues tonight, but this is the beginning of a process. As Dana laid out, we have a strategy and different tactics we're going to use to stay in communication, and we're going to work through this together as a group of stakeholders to get to an end state at the end of this process. The issue of noise will be a discussion point. We'll evaluate and look at the noise impacts associated with the different alternatives and what the possibilities might be. In response to the question of 'Why are we using all these tax dollars for an investment at the airport when the community isn't even keeping up roads around the airport,' the MAC is user-funded so we don't use any tax dollars. So the resources that go into planning, environmental evaluation or construction at the airport is a user-fee based funding model. These are not general funds or any type of tax dollars we're using for our operation of the airport. We can't speak to local units of government and their operations as it relates to the use of local tax dollars for infrastructure."*

- *If the people who live in and around the airport were opposed to any expansion, would you continue on with your proposal of moving forward – yes or no? Chad Leque explained, as part of this process, we have to evaluate if there are going to be significant environmental impacts with this action. If there are, we have to deal with those. We have to figure out how we're going to work through those. As an example, as part of the discussion around the noise issue, one thing we have been talking about is reviewing our noise abatement plan when we're doing the noise evaluation. This means looking at things we can do at the airport from an operational perspective in collaboration with all of our stakeholders – tenants, businesses on the airport, communities around the airport – to identify the real noise issues and determine if there are any things we can do collaboratively to reduce those impacts. We have had successes at other airports doing these things without having a heavy hand type of regulatory approach, which we don't have the authority to do by virtue of federal law. We've had successes in this area at MSP with our airline partners, the FAA, etc. So yes, it would go through, even if there was a strong opposition to it? Chad explained that the MAC has a statutory obligation to make sure it is*



*maintaining adequate infrastructure for air transportation in the metropolitan area – that is undeniably part of the MAC’s function and role from a statutory perspective. If this process moves forward and there is an alternative that is clearly needed and if the MAC is going to maintain its commitment to the purpose for which the legislature formed it, then the MAC has to move forward with those things. However, Chad reiterated that we want to do it in a way that makes sure we kick over every stone to try to reduce any impact associated with that, and we really are dedicated to that as we move through this process.*

- Are you saying, then, that the MAC’s only responsibility is to the aviation community and you have no responsibility to the residents around the airport? *Chad Leque responded, no, absolutely not and explained why he’d hope one wouldn’t make that analysis of the MAC. He pointed to what we’re doing here tonight, and said, “We’re doing this because we’re not an organization that’s like that. If you look at the MAC’s history in terms of how we operate relative to our vast array of stakeholders, if you look at the MAC objectively, when you look at our record of how we’ve dealt with things like this, when it comes to discretionary actions to try to be sensitive to and listen to the concerns of the residents around our airports, we have a pretty robust record. Not only at MSP but at our other reliever airports as well. This is your own assessment to make but I’d hope what you will take away from this meeting tonight is that we are committed to that as part of this process, because what we we’re doing here tonight, believe it or not, in terms of federal requirements, is discretionary. That doesn’t mean it’s not important and that doesn’t mean it’s not a priority for the MAC. So in answer to your question, no I don’t think that’s categorically the way the MAC operates and I don’t think our record demonstrates that.”*
- After living out here for 30 years, and this airport having comprehensive plans renewed every 10 years from 1965 plans, with all this expansion, and 200 residents on the airport and that’s been declining for the last 30 years, under the data practices act, I’d like you to release documents that show how much money you’ve already spent over the last two years for this plan, and the fact that the project is estimated around \$19M and what’s your return on your investment for the next 25 years for your 200 residents? I think it’s a lose-lose all the way around versus just resurfacing the runway that exists without moving our roads. How do you accommodate this huge expense of MSP dollars for people that don’t use that runway? And our local community sees no benefit to this. How can you justify spending that kind of money and resources that you’ve done for an airport that’s becoming obsolete? Because we’ve got residents all the way around you. You shut down a runway at Anoka already, and you’re comparing our runway airport to the 83 airports around the state that, when you look at Google maps, there’s maybe one farmer for miles around those airports. So how do you justify that? *Chad Leque responded that in addition to the 200 based tenants, there’s transient traffic that comes through these airports that use these facilities. They’re public-use facilities – not private airports just for the people based at the airport – that’s an important distinction. He noted another thing to think about when talking about the value proposition of the airport is the concept of a system. It is a system for a reason, and part of that system is MSP. The airports in the system work in conjunction with one another to ensure the MAC is meeting its statutory mandate to provide safe and convenient air transportation and promote aviation in the metro area. He also noted Lake Elmo Airport provides economic value to the community. Chad then turned it over to Neil Ralston and Joe Harris to further respond to the questions and comments. The questioner then repeated his request for the MAC to disclose and publish this information under the data practices act and speculated that the MAC has spent millions already on this project. Melissa*

*Scrovonski responded that he would need to put this request in writing and that we wouldn't have the information available tonight. Neil Ralston reported the information in question can be pulled together and provided, but that it was much less than the millions of dollars the questioner speculated. He explained that much of this work is done with in-house resources, and reminded the public that the money expended for these efforts is internally generated through the aviation system; we're not using local tax dollars. I'm asking for where is the return on investment? For the amount of money you are going to spend on Lake Elmo, how are you ever going to receive a return on your investment? If you spent \$4M upgrading a runway, how in the world is that airport even going to justify spending that amount of money? Chad Leque responded that it's important to remember it's a public asset and there is a public service component to what the MAC does. He asked, "If we operated on the basis that every single public asset had to have a return on investment, what would happen to some of the infrastructure we have in this country? It's an investment made for a public service for transportation. That's a big component in what we're talking about. It's a transportation asset that's available for public use, just like the interstate highway system."*

- *When was the last time the runway was resurfaced/repaved and what do you anticipate the life of the new runway to be? Neil Ralston responded that the existing runway has been in position since the 1950s, and it's been resurfaced several times but the base underneath the surface is past its useful life. He explained that we can't keep repaving the existing runway infrastructure; we need to rebuild it from the dirt up, so we want to make sure we get the new replacement runway in the right place. The new runway life is a 20-50 year investment. And one of the primary reasons for moving forward is we have to address failing, end-of-life infrastructure at Lake Elmo Airport.*
- *We've seen significant groundwater problems, noise pollution problems from this airport. As you plan to take action regarding the runway, are you going to do anything about the sources of pollution that come from this airport at the same time, such as the groundwater situation? As part of the engineering aspects of rebuilding the runway, will you take advantage of that opportunity when the airport is shut down to remediate some of the environmental health issues? Chad Leque responded that if we run into something during construction that is an issue or an impact, we will deal with it. Neil Ralston reported that the groundwater contamination issue that was identified in the area was not associated with the airport. Chad Leque then noted that, regarding the groundwater and the filtration systems that the MAC installed in homes, it was determined to be a source offsite that had nothing to do with the airport. Chad also said, "If, in the course of conducting the environmental evaluation, and if we do construction at the airport, we encounter situations where there are impacted soils or something of the like, of course we will deal with those in an environmentally responsible manner as part of this effort. Part of the evaluation we're going to be doing when talking about the affected environment is taking into account any preexisting conditions we should be thinking about as we embark on possibly preparing for something like this."*
- *I don't think it's any secret that 3M has looked at Lake Elmo Airport as a possible place for which to bring its corporate planes, and has considered the airport unsuitable for their needs. As I listen to the concerns of my fellow residents, it bothers me that perhaps we're going to see more of this type of corporate use and you won't be able to stop it because it's legal. And to what extent that increases the traffic, noise, and so on that we will have to endure as local residents. Chad Leque responded, if you look at the existing 3M fleet, they are big aircraft – big corporate*

*jets. They are going to need runway in excess of 3,500 feet to operate effectively, which is why they're based at St. Paul Downtown Airport, because we have that over 6,000-foot-length runway at that airport to accommodate those operations. Joe Harris then stated that a big community concern with the Lake Elmo Airport proposal is that a 3,500-foot runway could introduce more jet traffic to the airport as well as maybe an increase in overall traffic as the population of the airport continues to grow. He noted that the MAC did a runway reconstruction at St. Paul Downtown Airport last summer in which the runway was shortened to 3,800 feet. He said, "By our calculations, 3M could actually use about 4,500 feet. 3M relocated to MSP as a result of not having at least a minimum of 5,000 feet. They were going to relocate if they lost even one foot at St. Paul. The reality of these large-scale corporate operators who are flying big jet aircraft that fly across the globe relocating to Lake Elmo – it's not going to happen."*

*Regarding the jet traffic issue, Joe acknowledged that small jets can land on 3,500 feet, and do so in the middle of nowhere in communities in which they need to provide service to a client or for whatever reason they need to fly in there. He acknowledged we have great nearby facilities, like New Richmond, Osceola, St. Paul Downtown, Anoka, Flying Cloud, that have had significant investments made to attract and accommodate those types of jet aircraft because they require NAVAIDs, and more significant runway and taxiway infrastructure (all the things that won't be part of the future expansion at Lake Elmo) – is that you have a service provider at those airports that can accommodate the needs of not only the passengers but the aircraft itself. He reported that we don't even have jet fuel at Lake Elmo today, nor will we require the operator to have jet fuel for sale if or when this project goes forward. However, he noted, we could have a service provider change in which the current business owner may sell and the new service provider may elect to sell jet fuel to accommodate turboprop aircraft like King Airs, similar to what Governor Dayton flies around. Joe also mentioned that the hangar inventory at the airport wouldn't accommodate a 3M fleet. He said a lot of what's changing in the general aviation (GA) world is similar to computer technology: "If you don't have wireless in a building like this, you're not maximizing the students' learning. Teachers aren't able to use tools to advance the learning process. A lot of the GA airplanes at Lake Elmo today have been in existence for 40-50 years. Not only are some of our pilots retiring, those aircraft are soon going to be in museums as well. The new technology GA airplanes out there – the ones that are made in Duluth like the Cirruses that can be half a million dollars each, you start outfitting them and they can be upwards of three-quarters of a million or a million dollars, these are single-engine, 4-person piston aircraft that can fly ranges – single pilot – 1,000 miles. At an airport like Lake Elmo at 2,850 feet, it's not a real option for them because they can't use their aircraft to max utilization. These improvements will allow us to almost catch up to where the industry is now, with the future evolution of the aircraft as well as the pilot. It's kind of two-pronged. Certainly they can operate at 2,850, but with some of the lighting systems and instrumentation that we don't have, they're having to make a stop in between to get to their destination point. We have several people at the airport now that own these aircraft that are able to make four or five stops in communities that aren't served with commercial air service by basing out of Lake Elmo right now, so we're seeing that population slowly grow. When a hangar does come for sale at Lake Elmo, there are two or three buyers already looking to purchase it so there still is a high demand, quite frankly because we've got a great airport and this is a great community to be part of. Our pilot community that's here, they're here because they want to better understand what the community thinks of your airport because they want to walk down this road together to make it all work. We want to share with*

*you, who we are, and give you a better understanding of the activities that are at the airport and I'm hoping some of the pilots here will share a little about their story and how they use the airport, because it is turning over a leaf from recreational hobby – and we still have a lot of that out there – but a lot of the airplanes are used for a business purpose, and I believe will be going forward in the future.”*

- A number of people have had a lot of questions about the demographics and statistics used. A couple I've heard: "26,000 operations" (landings and takeoffs) and "10-seater" (*Chad Leque clarified "less than 10 seats"*). What is the breakdown of the 26,000, because when I hear a King Air, I know it's a King Air – it makes a huge difference between a recreational Cessna and a King Air. When it comes down to the usage in the area for the noise impact, that differential is night and day. It has to be a minute percentage right now, and when you say that the use is moving from recreational to business use – that's the first time I've ever heard that in these meetings – in terms of going from rec to bus use, a lot of people in this area have homes and have made investments in this area, you're making them based on what the current conditions are, and going from 1% King Air to 20% King Air makes a huge impact on our investments and quality of life from an environmental standpoint. In terms of demographics, I see that big 10-seat, I don't hear a lot of 10-seaters taking off at Lake Elmo, I'd love to know what that breakdown is. *Chad Leque responded, when we talk about those 14 categories we'll evaluate as part of this analysis, one of those is noise. Chad asked the questioner to write down some of these specific things he's interested in and concerned about on a comment card so we can bring it into the environmental analysis. He reminded people that we're at the beginning of this process and these are the kinds of things we want to hear. He acknowledged that noise is an issue people are concerned about, and that the environmental impact categories and noise will definitely be one of the topics at the third public event. Chad explained to the public that by submitting questions and concerns in writing, we can try and hit on some of those things during that meeting.*
- The \$120,000 of property taxes from Airport usage that you quoted earlier – in terms of total operating budget, does any of that comprise money that comes from pass-through [transient] traffic [those who do not lease hangars at the airport]? Do they pay any sort of compensation? What's the breakdown? Do you have an economic model of the airport that's available? *Joe Harris answered that anybody who does business at the airport pays our tenant fixed base operator, who provides the service, who then pays 1.5% of gross receipts to the MAC. This would include those who are coming in and purchasing fuel, maintenance services, and ground handling services, or paying an apron fee (i.e., paying to park their aircraft). Obviously it's complex, is there any way you can just publish the economic model? Joe answered yes, we can put together a pie chart and make that available.*
- You've used words like collaboration and communication and stakeholders. In terms of collaborating with the community, I know from speaking with a lot of people here, a lot of people are upset because it's 13 people on this commission [Community Engagement Panel] but there's really not anyone that's on the other side; well there are a couple people from the other side of the voices. Is there any way to even it out in terms of having some of these questions – there's a couple sticking points, like eliminating jets, if that's a possibility, or keeping the same length – great, we'd love you to improve the airport but can you keep it at the same length? I think there are a lot of people who would buy into that. It's increasing it which would increase new jet traffic, new King Airs, all those kinds of increases are what are really rubbing people the wrong way. You talk about collaboration, is there any way to meet in the middle in a



negotiation? Right now it feels like there's a lot of power on one side and it's "this is what we're going to do but we've got to go through this process." *Chad Leque answered, regarding the composition of the Community Engagement Panel, our intent was to make sure we had all the major stakeholder groups represented. Really, an important part of the process/intent of this group was to make sure the flow of information was getting to the right people. They are ambassadors to the process from their respective stakeholder groups. Those meetings are open to the public – they are not closed meetings. Chad continued, saying "I heard you say collaborating and then you mentioned not extending the runway. Going back to the mission the MAC has as an organization, we're looking at the existing airport infrastructure. If you go back to our statutory mandate to provide efficient, effective and safe infrastructure within the metro area for air transportation, as part of the purpose and need process we are going to vet what is really needed at the airport. What's the purpose of what we're doing? Do we need the extra runway length to be sure we're providing adequate services to ensure effective, efficient and safe operations at the airport? The LTCP evaluated that and demonstrated that, although the FAA advisory circulars say that based on the design aircraft, we could go up to 3,900 feet, in terms of providing real utility, the planning process brought it back to 3,600 feet. We went through the LTCP process and there was discussion and dialogue with the community, a lot of concern about intersecting Neal Ave. at a new location with 30<sup>th</sup> St. We cut another 100 feet off the runway extension, all while trying to stay true to what the legislature tells MAC it's supposed to be doing. I'm not suggesting that you were suggesting this, but I don't know that it's fair to say that in this case, effective collaboration somehow equates to no runway extension." I don't mean to say that, but in terms of the legislative mandate you have, there's a difference between operating a safe environment for recreational flyers versus growing it to accommodate business travel, as your person said. Chad responded, saying, "I think it's important to point out what is in the statement that Joe Harris made regarding business use in terms of the significance of that, and the impact of noise: A Cirrus aircraft is a 4-person airplane; a high-wing Cessna 172 is a 4-person airplane – the GA small aircraft. What Joe was saying is that with new technology in those small, composite airplanes, you can start to get speeds at altitude that make them very useful for longer-range flights. But the noise impact on the ground is really no different than the high-wing Cessna 172. It's a similar discussion we're having at MSP with advanced system airframe technology and engine technology and noise – bigger doesn't always mean noisier. In the case of Lake Elmo Airport, it's not a build-it-and-they-will-come scenario for bigger airplanes. It's a build-it-to-get-better-service-to-those-that-are-there scenario when you look at it in the long run. The design family of aircraft is not changing. It is what it is today out there. We might see some shifting – but not seismic – a shift in the demographic of aircraft. But it's really about making sure that we're being responsible as an organization in meeting that efficiency and safety component of the service we're supposed to provide to the flying public."*

- I'm a pilot from Lake Elmo Airport and I just wanted to put a face to an airport tenant. I know I may not be the most popular person here, but I'll do my best. I'm a second-generation pilot. My father was a pilot – not professionally – but for his business. I just want to throw out there the business example. He had a consulting engineering business as an environmental engineer serving small communities, working on water treatment facilities around the five-state area. He used a small jet to fly him and his engineer around to these small towns to serve them. The small aircraft was not a King Air – it was either a Cessna 172 or a Bonanza or something smaller – single-engine aircraft. It's just an example that when we talk about the business traveler –

people may not necessarily understand that the business traveler may be in a small aircraft, and that's understandable. But I'm telling you it is true in my particular case. Subsequently, we located our medical design and manufacturing company in Stillwater, specifically so we had access to a local airport to fly a small aircraft to serve local community hospitals in the five-state area. I just wanted to give a counter example – a real-world example that does exist. I do appreciate and understand your concerns of the large aircraft, and I would share that concern as well; I think it's reasonable to be concerned. I just want to say that when you're looking at commerce, it's not necessarily big aircraft. It might be the Cessna 172, the Bonanza, the Cirrus – small aircraft, 4- to 6-seat, single-engine, relatively quiet aircraft – just to put a face on that. The other thing I wanted to mention, and John Renwick is here – he's on the Community Engagement Panel – and he and I spend a lot of time figuring out and talking about how we can collaborate as stakeholders to be respectful to the community with respect to airport noise. We are very sensitive to that as well and we want to do everything within our power to positively impact operational things we can do to reduce the impact of noise. I live right by Hwy 95 and every spring the motorcycles come up and I call the sheriff pretty much every weekend because they're heading through town with vehicles that are intentionally modified to be loud. That's what really infuriates me. This is not commerce, this is somebody who intentionally modified their vehicle to be loud, which I feel is very disrespectful. As pilots, we do our best to be respectful of the community and will continue to do so regardless of this plan, to look at what we can do from an operational perspective to reduce the impacts. If you have feedback, we'd love to hear from you. If there's a particular loud aircraft you hear every Saturday morning at 6 a.m., let us know, because we can actually go talk to them and suggest they do it at 7 or 8 a.m. Even though there might not be a way of restricting that behavior from a legal perspective, normally when you talk to a pilot at Lake Elmo and tell them they're being disrespectful, they change their behavior. That's more of the character of the pilot and operator at Lake Elmo.

- I would like to say under your affected environment bullet points, one of the things you did not address are roadways. And that's what a lot of people in the room have issues with – your reconfiguration of 30<sup>th</sup> Street N. That should be addressed in that topic. And who pays for the road? *Chad Leque responded that, absolutely, roadways will be addressed as part of the alternatives analysis and will be a discussion point.*
- Will property values be addressed? *Chad Leque clarified, "in terms of noise?" In terms of decreased property values because of noise. Chad responded that those are issues we'll have to address – that's typically something that comes up through this process.*
- I think you failed to develop a purpose and a need. You're developing a plan for the future. That plan is to accommodate a different operator that can bring in jet fuel and the runways are designed so you can bring in bigger planes. Fixed-wing aircraft or high-wing aircraft doesn't take that much runway to take-off and land in. *Chad Leque responded that the purpose and need discussion will be a topic of our next public event, so we'll take up that discussion in much more detail in July, and stated that this was a good ending point for the question-and-answer session, as we've reached the end of the meeting time.*

Chad Leque reminded the audience that the project team would be available in the rotunda if anyone had further questions or wanted to speak one-on-one.

The meeting adjourned at approximately 8:10 p.m.





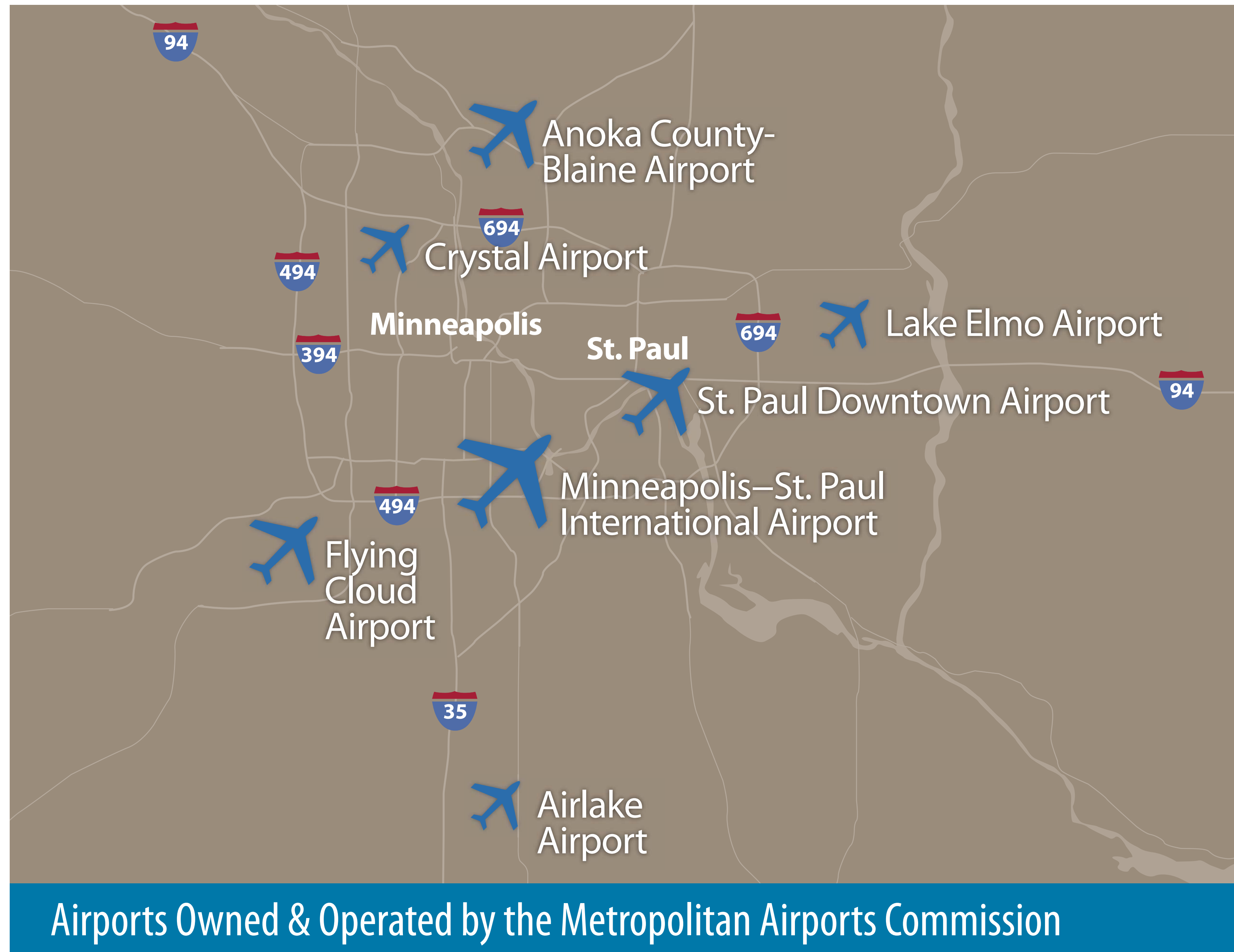
Welcome!



Public Event

# Environmental Assessment Lake Elmo Airport





## Metropolitan Airports Commission (MAC)

- Owns and operates seven airports within 35 miles of downtown St. Paul and Minneapolis, including MSP and six general aviation airports
- Public corporation created by the Minnesota Legislature
- Provides and promotes safe, convenient, environmentally sound and cost-competitive aviation services to its customers
- Operates via user fee-based funding

## Environmental Assessment Lake Elmo Airport



# Lake Elmo Airport (FAA Identifier: 21D)

- Integral part of the MAC's General Aviation Airports system
- Accommodates personal, recreational and some business aviation users
- Primarily serves and will continue to serve small, propeller-driven aircraft with less than 10 passenger seats
- Only public airport in Washington County

*According to the Minnesota State Aviation System Plan published in 2013, 21D is one of 83 Intermediate Airports in the state*

	MN Intermediate Airports	Lake Elmo Airport	
	Average Number	Rank Among MN Intermediate Airports	2016 Numbers
<b>Total Based Aircraft</b>	31	2 <sup>nd</sup> of 83	194
<b>Annual Operations</b>	10,108	4 <sup>th</sup> of 83	27,274
<b>Primary Runway Length</b>	3,654 feet	79 <sup>th</sup> of 83	2,849 feet

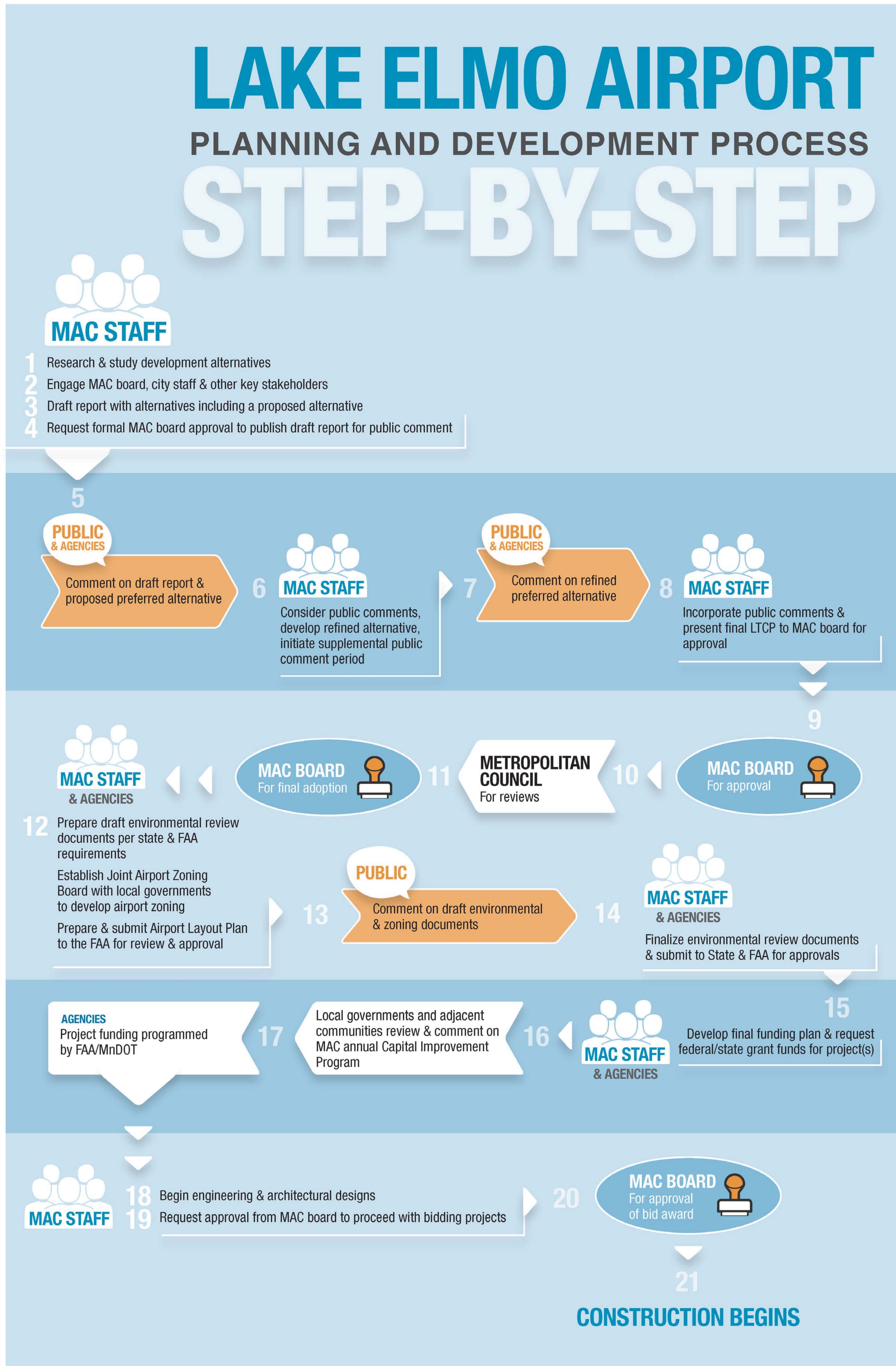
Source: Airport IQ 5010 Airport Master Records.

Environmental Assessment  
Lake Elmo Airport





# Planning & Development Process



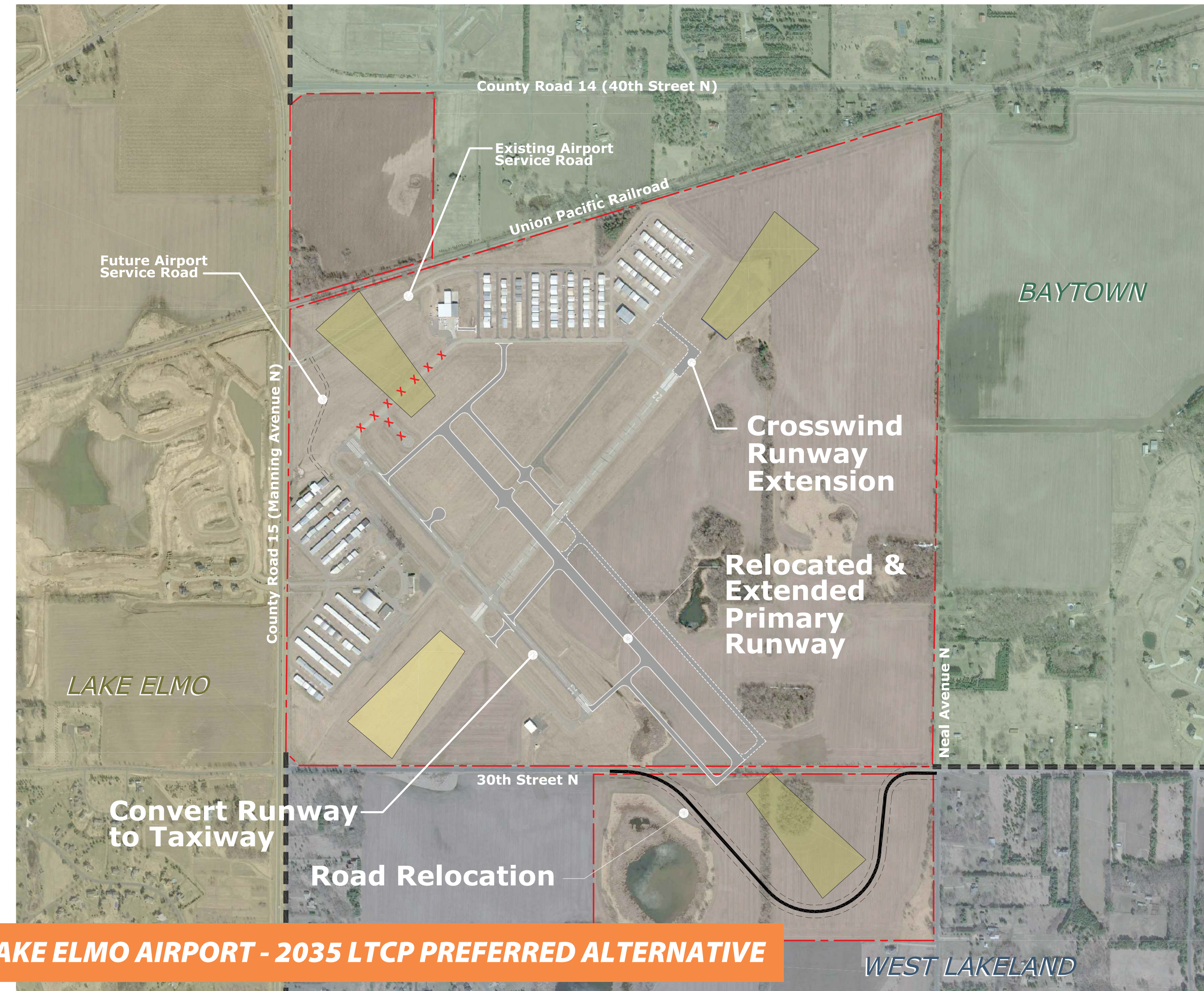
## Environmental Assessment Lake Elmo Airport





# Project Overview & Objectives

- Address failing infrastructure that's at the end of its life
- Enhance airfield safety
- Improve facilities for the aircraft currently operating at the airport



**LEGEND**

- Existing Property
- Municipal Boundary
- Existing Runway Protection Zone
- Proposed Runway Protection Zone
- X X X X X Pavement to be Removed
- Future Pavement
- Proposed Road Relocation

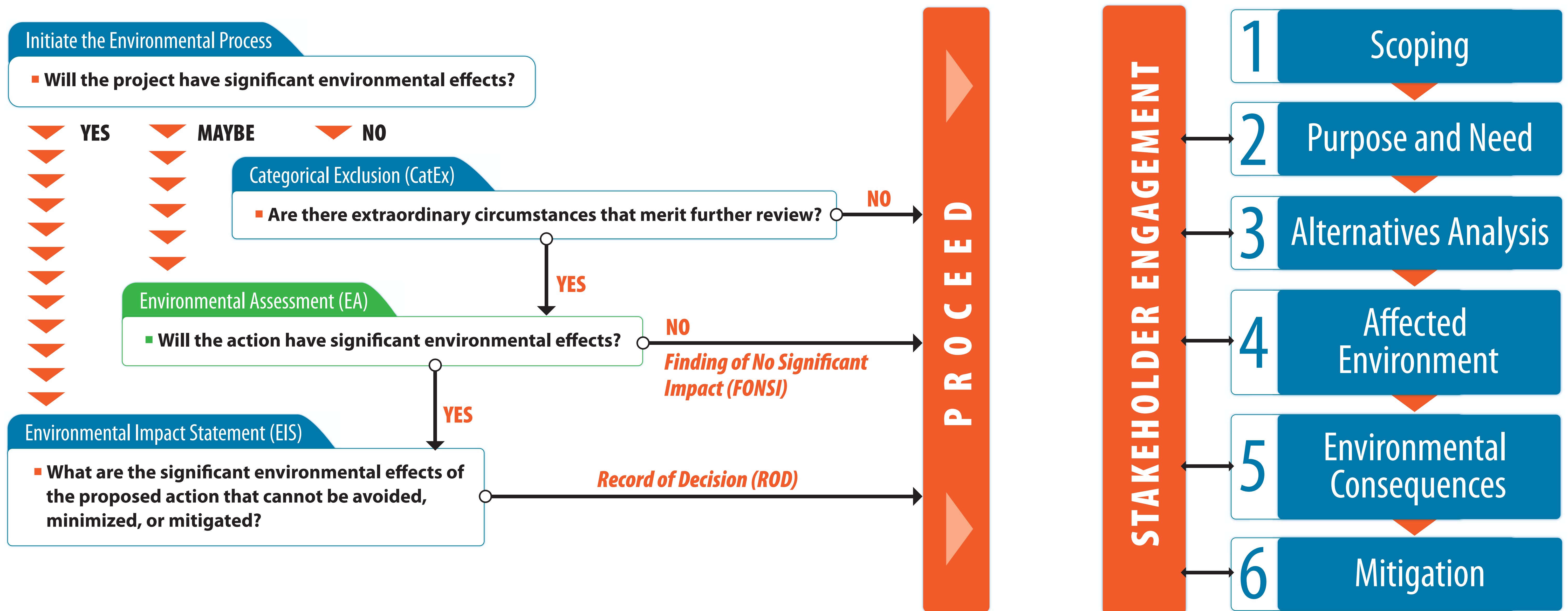
A supplemental planning analysis will be conducted as part of the EA/EAW to verify the LTCP aircraft operations forecasts, runway length determinations and development alternatives.

## Environmental Assessment Lake Elmo Airport





# National Environmental Policy Act (NEPA)



Environmental Assessment  
Lake Elmo Airport



# Environmental Analysis Categories

- **Air Quality**
- **Biological Resources** (including fish, wildlife, and plants)
- **Climate**
- **Coastal Resources**
- **Department of Transportation Act, Section 4(f)**
- **Farmlands**
- **Hazardous Materials, Solid Waste, and Pollution Prevention**
- **Historic, Architectural, Archeological & Cultural Resources**
- **Land Use**
- **Natural Resources and Energy Supply**
- **Noise and Compatible Land Use**
- **Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety**
- **Visual Effects** (including light emissions)
- **Water Resources** (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)

Environmental Assessment  
Lake Elmo Airport





# Minnesota Environmental Policy Act (MEPA)



- **What is it?** MEPA requires an environmental review process, similar to the federal NEPA process, to be used by local governments to analyze the potential environmental effects of proposed projects.



- **What does it require?** An Environmental Assessment Worksheet (EAW) is required by MEPA for construction of a new paved airport runway less than 5,000 feet long.



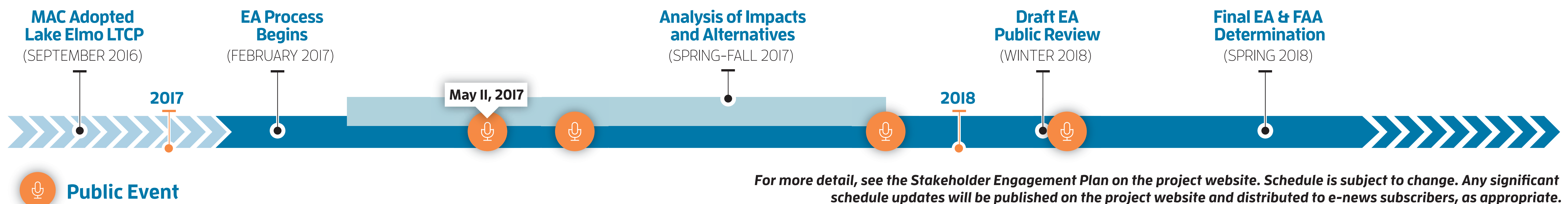
- **How will it be accomplished?** We will prepare the Federal EA and State EAW concurrently, as they share many of the same informational requirements. We will then complete the standard EAW form and submit it as an appendix to the Federal EA.

Environmental Assessment  
Lake Elmo Airport





# Anticipated Environmental Assessment Timeline



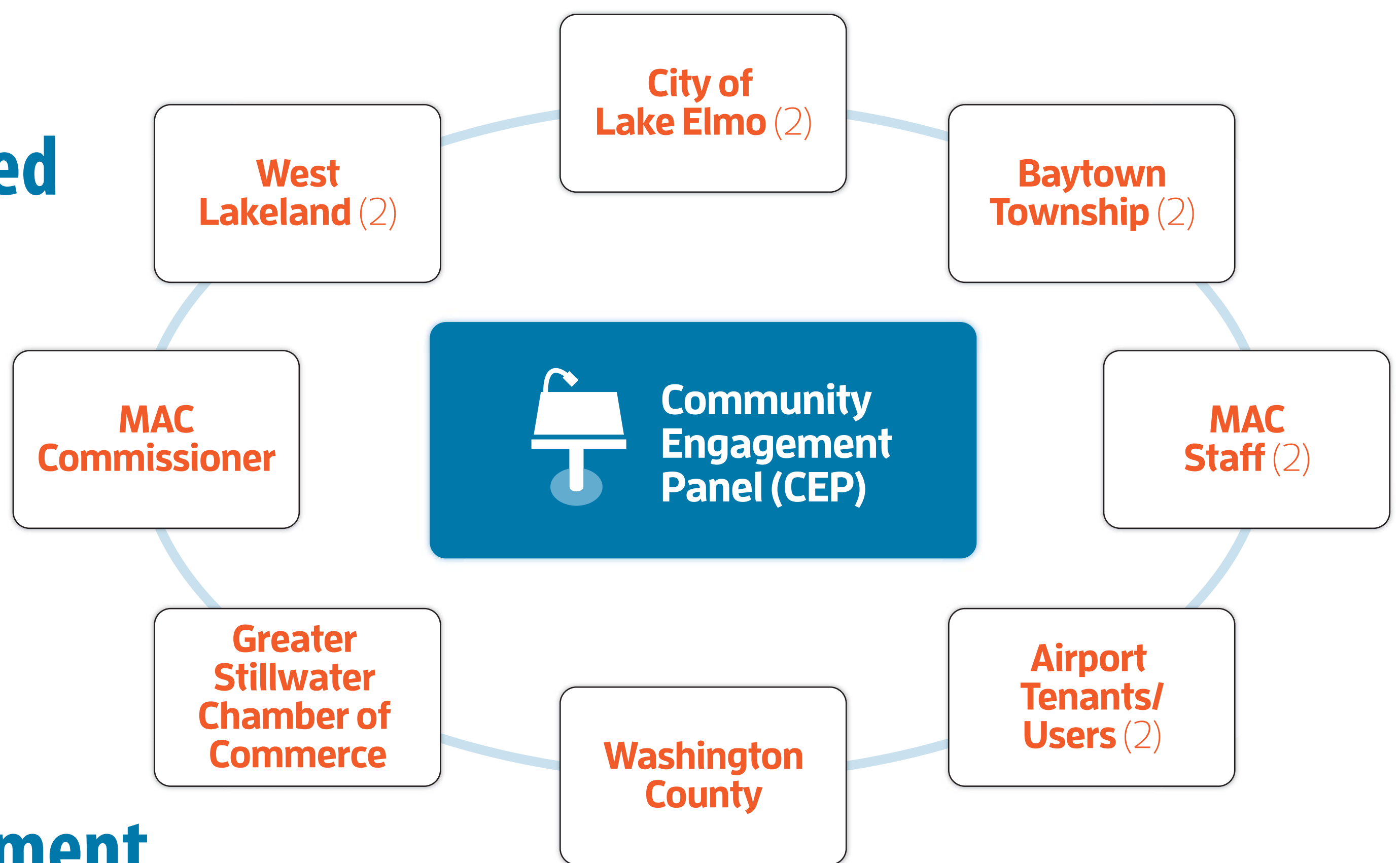
Environmental Assessment  
Lake Elmo Airport





# Stay Involved!

The MAC is committed to a transparent and open community involvement process and has established a Community Engagement Panel (CEP) for this project.



This is an advisory panel representing a diverse group of community stakeholders, including government representatives and staff, airport users, and local residents.

 Sign-up to receive updates via our e-news subscription program

 Check out the project website for up-to-date information

 Attend the four public events to learn more about the project

 Share your thoughts via the “Contact Project Team” tab of the website or on the comment forms at the public events

Project Website 

[www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx)

## Environmental Assessment Lake Elmo Airport



# Lake Elmo Airport

## Environmental Assessment (EA)/ Environmental Assessment (EAW) Worksheet



May 11, 2017 – Public Meeting  
Introduction to the Environmental Assessment Process L-237



# Agenda

- MAC Purpose & Mission
- Recap – Long-Term Comprehensive Plan (LTCP)
- Environmental Process Overview
- Stakeholder Engagement Plan
- Next Steps
- Questions?





# Metropolitan Airports Commission



We provide and promote safe, convenient, environmentally sound, cost-competitive aviation services for our customers.

- Public corporation created by Minnesota Legislature
- Owns and operates airports within 35 miles of downtown St. Paul and Minneapolis
- MSP International Airport
- Six general aviation airports
- User-fee based funding
- Limited property taxing authority unused since 1960s





# Board Makeup



- Gov. appoints chairman and 12 commissioners (8 metro, 4 outstate)
- Minneapolis and St. Paul mayors each appoint one



# Legislative Mandate to Effectively Enable Aviation

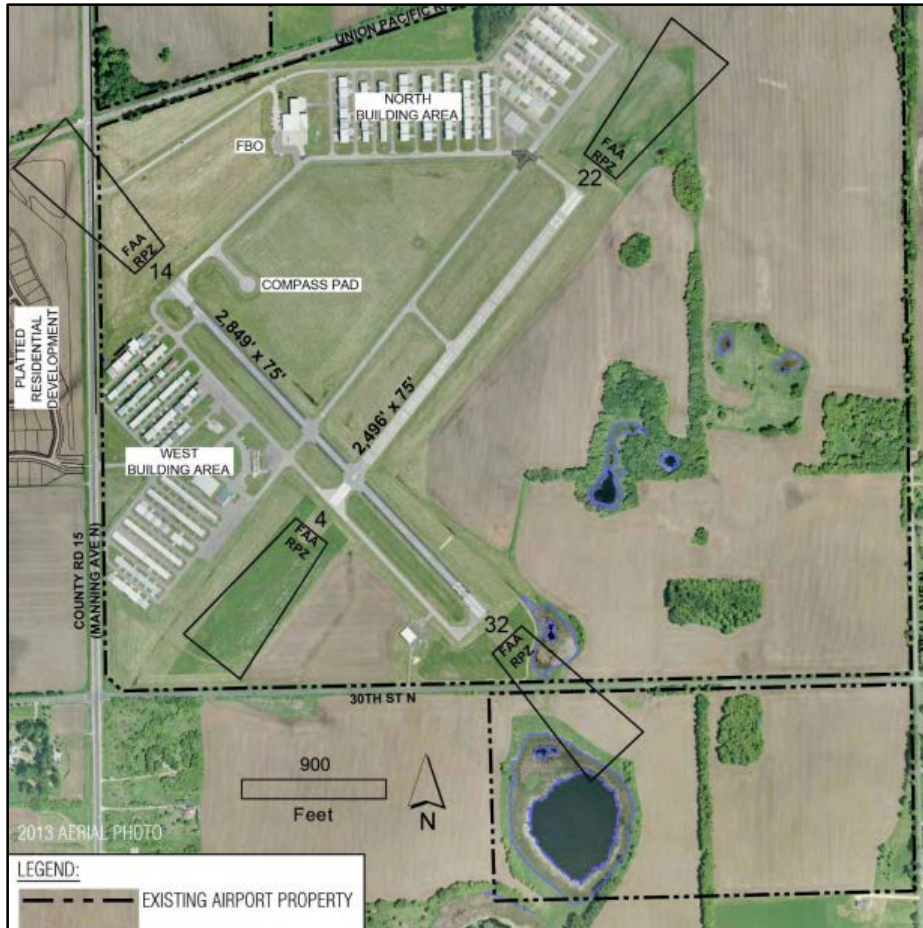


(1) promote the public welfare and national security; serve public interest, convenience, and necessity; promote air navigation and transportation, international, national, state, and local, in and through this state; promote the efficient, safe, and economical handling of air commerce; assure the inclusion of this state in national and international programs of air transportation; and to those ends to develop the full potentialities of the metropolitan area in this state as an aviation center, and to correlate that area with all aviation facilities in the entire state so as to provide for the most economical and effective use of aeronautic facilities and services in that area;

**Minn. Stat. § 473.602**



# Lake Elmo Airport



## Primary Role of Lake Elmo Airport

- Integral part of the regional Reliever Airport system
- Accommodates Personal, Recreational, and some Business Aviation users
- Design Aircraft is and will continue to be small, propeller driven aircraft with < 10 passenger seats
- Role not expected to change in forecast period
- Only public airport in Washington County

## Existing Facility & Activity Level Overview

- ~200 Based Aircraft
- ~26,000 Aircraft Operations







# LAKE ELMO AIRPORT

## PLANNING AND DEVELOPMENT PROCESS

# STEP-BY-STEP

- 1 Research & study development alternatives ✓
- 2 Engage MAC board, city staff & other key stakeholders ✓
- 3 Draft report with alternatives including a proposed alternative ✓
- 4 Request formal MAC board approval to publish draft report for public comment ✓

5

**PUBLIC & AGENCIES**

Comment on draft report & proposed preferred alternative ✓

6 **MAC STAFF**

Consider public comments, develop refined alternative, initiate supplemental public comment period ✓

**PUBLIC & AGENCIES**

Comment on refined preferred alternative ✓

8 **MAC STAFF**

Incorporate public comments & present final LTCP to MAC board for approval ✓

9

**MAC STAFF & AGENCIES**

**we are here**

11 **MAC BOARD**

For final adoption

10 **METROPOLITAN COUNCIL**

For reviews

9 **MAC BOARD**

For approval

- 12 Prepare draft environmental review documents per state & FAA requirements
- Establish Joint Airport Zoning Board with local governments to develop airport zoning
- Prepare & submit Airport Layout Plan to the FAA for review & approval

13 **PUBLIC**

Comment on draft environmental & zoning documents

14 **MAC STAFF & AGENCIES**

Finalize environmental review documents & submit to State & FAA for approvals

# Long-Term Comprehensive Plan (LTCP)

Planning & Development Process Steps 1 through 11





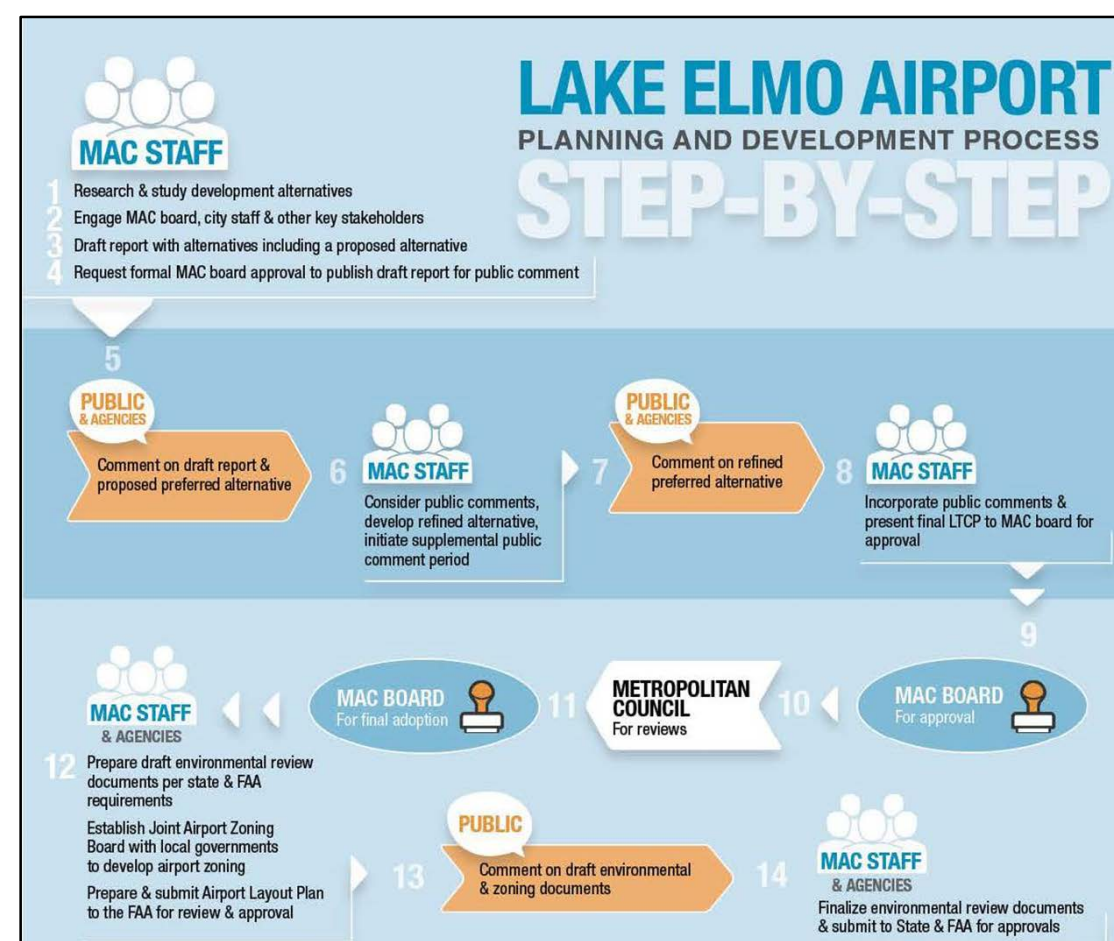
# LTCP: Meeting the Objectives

## Planning Objectives

- Addresses failing end-of-life Infrastructure
- Enhance safety
- Improve operational capacity for design aircraft family

## Addressing the Objectives: Proposed Project

- Relocate Runway 14/32 by shifting 615 feet to the northeast and extending to 3,500 feet, including all necessary grading, clearing, and runway lighting.
- Realign 30th Street North around the new Runway 32 Runway Protection Zone (RPZ) and reconnect to the existing intersection with Neal Avenue.
- Construct a new cross-field taxiway to serve the new Runway 14 end, including taxiway lighting and/or reflectors.
- Convert existing Runway 14/32 to a partial parallel taxiway and construct other taxiways as needed to support the relocated runway, including taxiway lighting and/or reflectors.
- Reconstruct Runway 4/22 and extend to 2,750 feet, including necessary lighting and taxiway connectors.
- Establish a new non-precision approach to Runway 14 end and upgrade existing Runway 4 approach to RNAV (GPS).

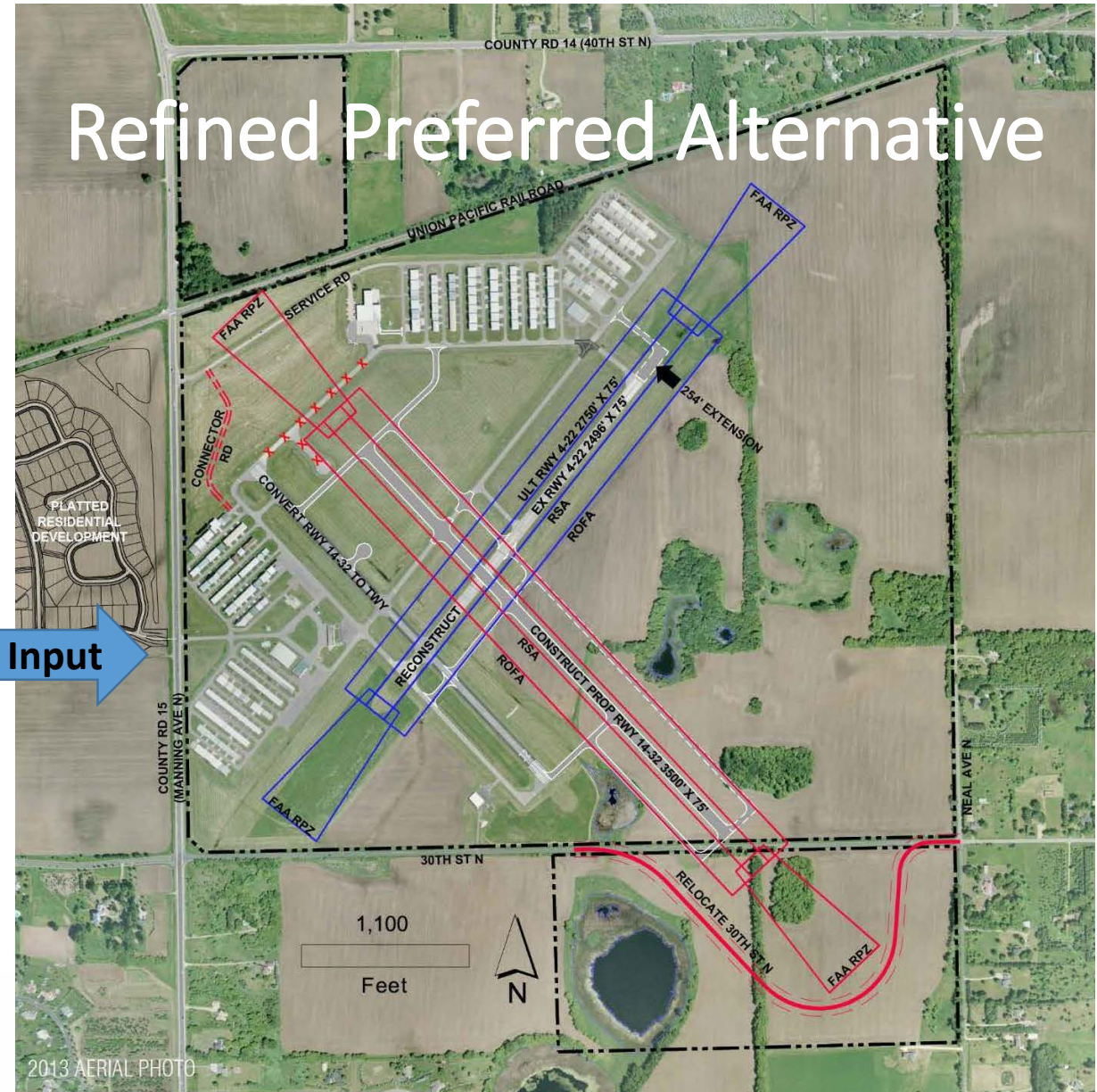
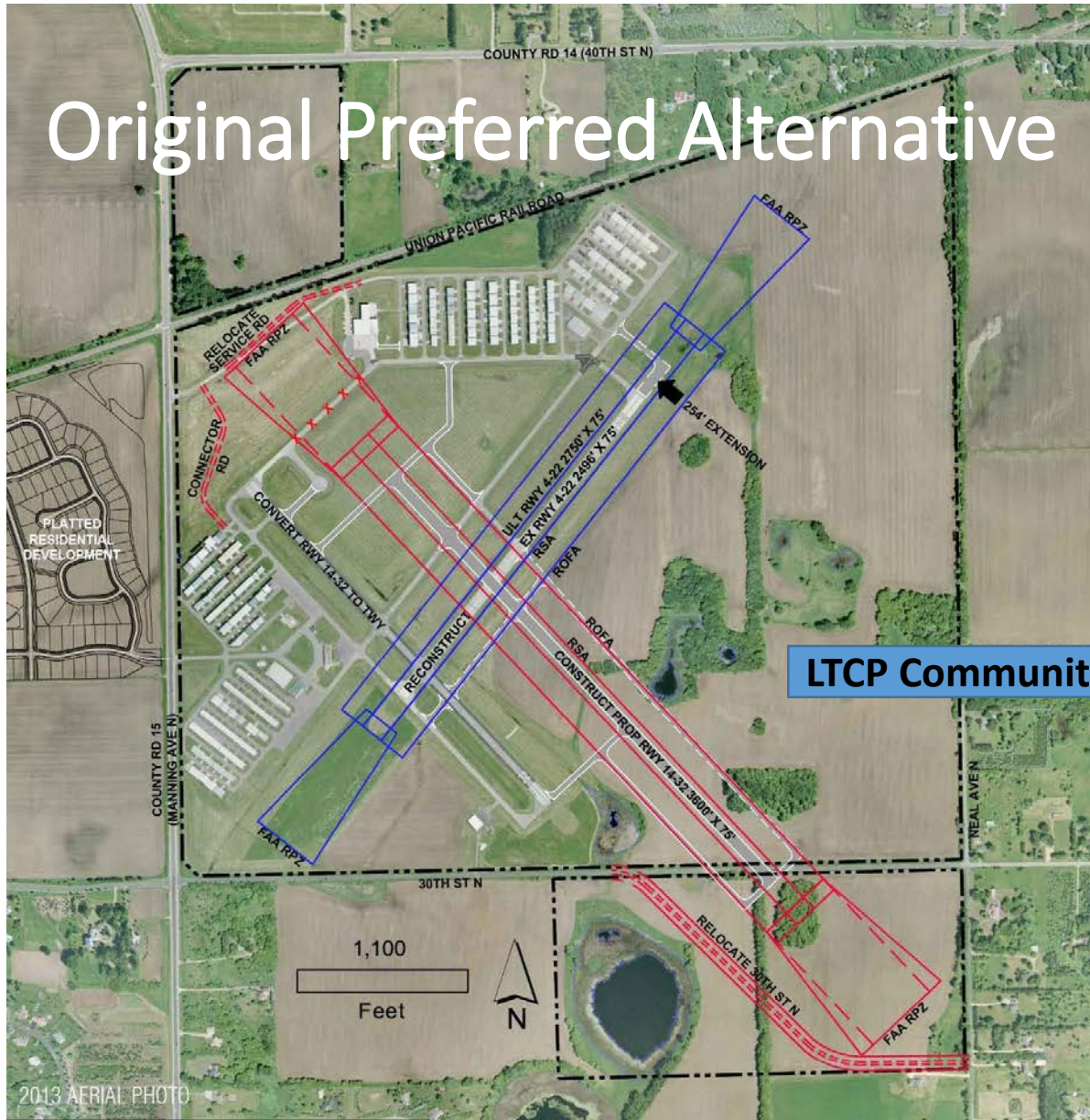


*“The Purpose of the 2035 Long-Term Comprehensive Plan (LTCP) is to identify future facility needs at Lake Elmo Airport for [a] 20-year period ..... It will also provides a road map to guide the MAC’s development strategy for Lake Elmo Airport over the next 5-10 years.....”*



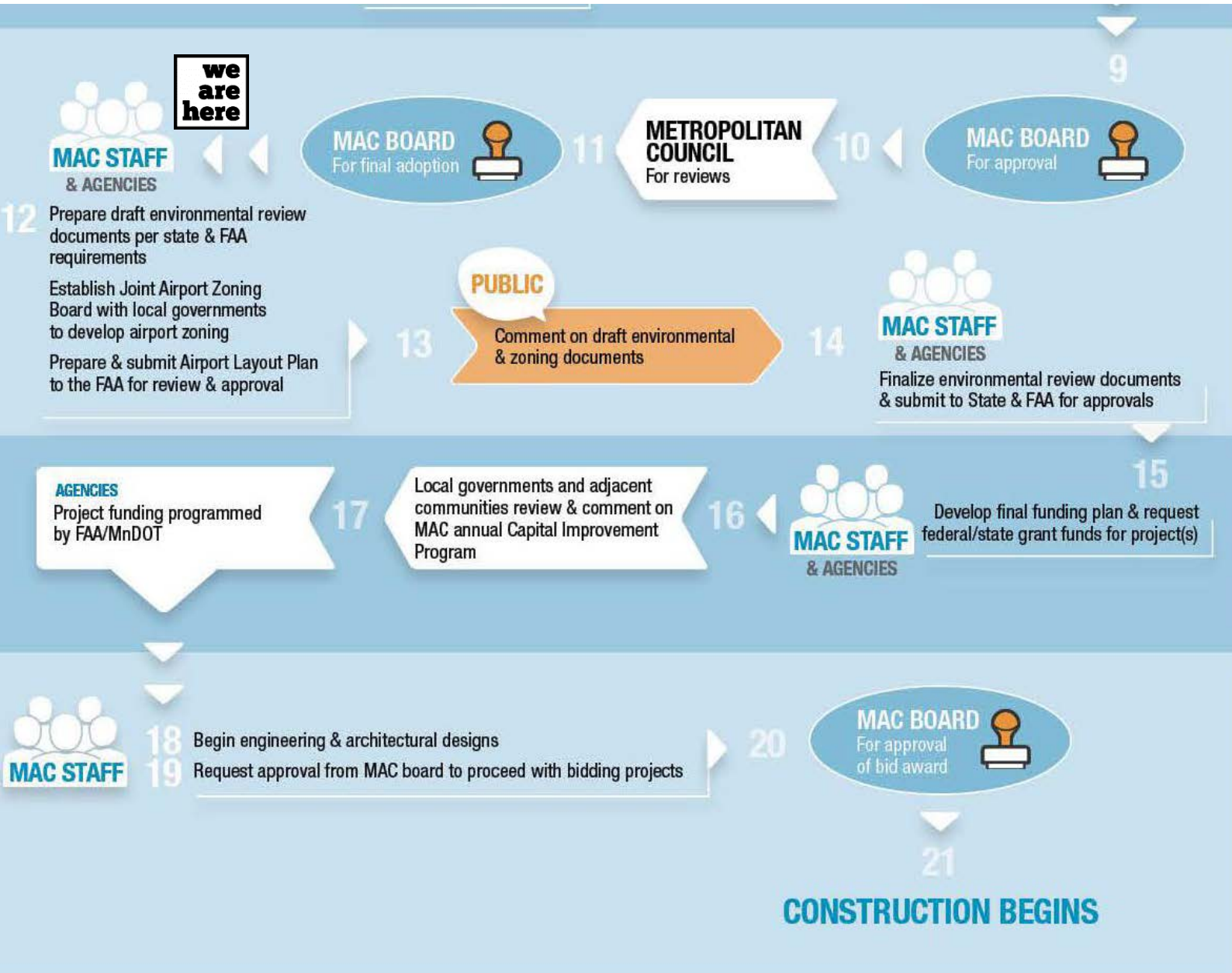
# Original Preferred Alternative

# Refined Preferred Alternative



LTCP Community Input





# Environmental Review

Planning & Development Process  
Steps 12 through 14



# Environmental Process Overview

- Federal and state environmental review is required before the project can be funded and implemented
- Federal Environmental Review:

Federal Aviation Administration (FAA) follows its policy and procedures for compliance with the National Environmental Policy Act (NEPA) and implementing regulations issued by the Council on Environmental Quality. This applies to actions that include grants, and any related federal action.
- State Environmental Review:

The MAC is the Responsible Governmental Unit for ensuring that the requirements identified by the Minnesota Environmental Policy Act (MEPA) are met in accordance with the associated Environmental Quality Board implementation guidance.





# National Environmental Policy Act (NEPA) – FAA Order 1050.1F

- FAA Order 1050.1F provides the Federal Aviation Administration’s (FAA) policies and procedures to ensure agency compliance with the National Environmental Policy Act (NEPA)
- Three levels of review:

Categorical Exclusion “CATEX”: A CATEX is a category of actions that do not individually or cumulatively have a significant effect on the human environment, and for which, neither an EA nor an EIS is required. If an action is on the FAA CATEX list – and extraordinary circumstances do not exist – it is eligible for a CATEX.

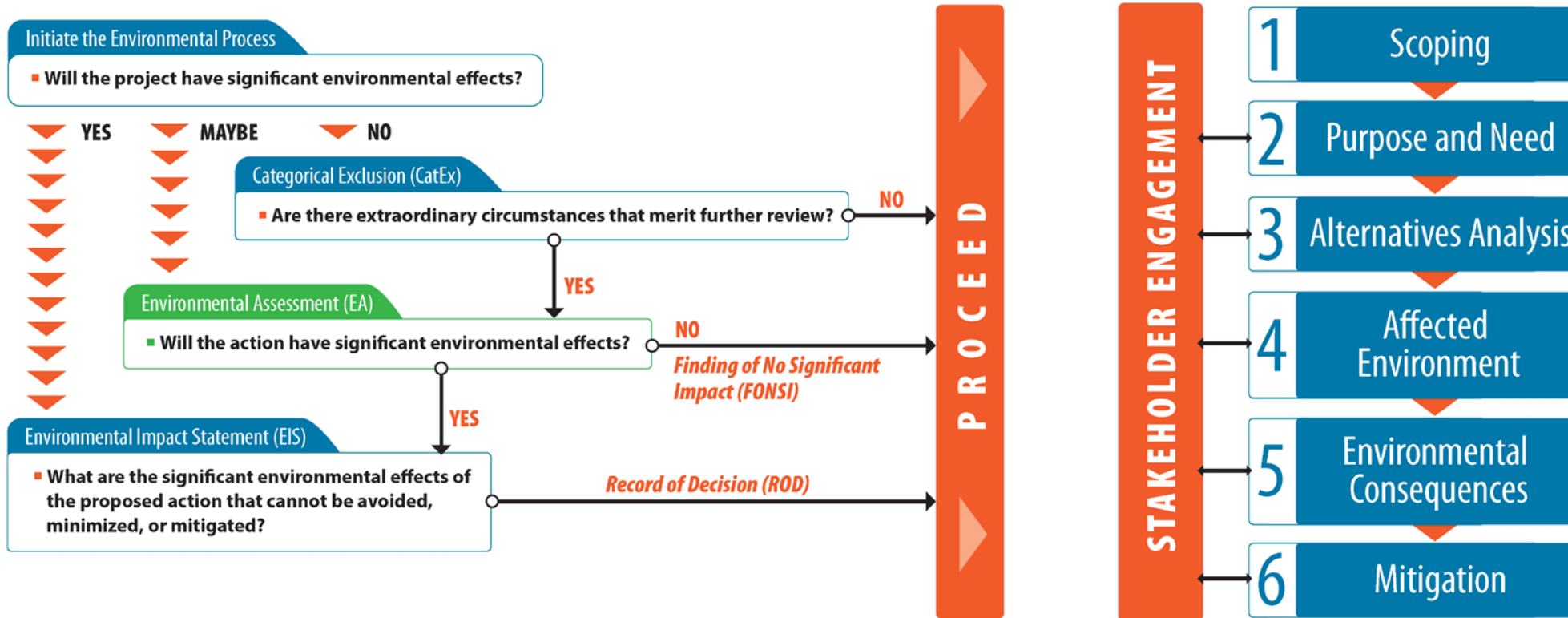
Environmental Assessment (EA): An EA must be prepared when the proposed action does not normally require an EIS and:

- (1) does not fall within the scope of a CATEX; or
- (2) falls within the scope of a CATEX, but there are one or more extraordinary circumstances

Environmental Impact Statement (EIS): An EIS must be prepared for actions significantly affecting the quality of the human environment when one or more environmental impacts would be significant and mitigation measures cannot reduce the impact(s) below significant levels.



# Federal Environmental Process



# Minnesota Environmental Policy Act (MEPA)

- MEPA requires an environmental review process, similar to the federal NEPA process, to be used by local governments to analyze the potential environmental effects of proposed projects.
- AOEE Statute and mandatory categories require Environmental Assessment Worksheet (EAW) (see Minnesota Rules 4410.4300)
- Because a Federal EA is being completed, it can fulfill the informational requirements of a State EAW (see MR 4410.1300 and 4410.3900)
- For Lake Elmo Airport, the MAC is both the responsible government unit (RGU) and the project proposer (see MR 4410.0500 and 4410.4300)



# Purpose and Need

- Purpose and Need Components:
  - Provide the required runway length necessary to meet design aircraft needs.
  - Prevent existing incompatible uses in the Runway 14/32 runway protection zones (RPZs).
  - Replace failing runway and taxiway pavement.
  - Provide adequate runway to taxiway separation.
  - Resolve hangar penetrations to Runway 14/32 transitional surface.
  - Provide adequate and modernized instrument approach capability for users.





# Alternatives Analysis

- Compare and evaluate alternatives for meeting the Purpose & Need.
- Alternatives will be developed in sufficient detail to allow an evaluation and comparison in terms of cost, operational and safety factors, and environmental issues.
- Analysis will be completed for all alternatives identified in the LTCP, and rely on information from the LTCP, as well as any refined versions of the preferred alternative developed under the Supplemental Analysis.



# Environmental Analysis and Cumulative Impacts

- Affected Environment
- Environmental Considerations:
  - Air Quality
  - Biological Resources (including fish, wildlife, and plants)
  - Climate
  - Coastal Resources
  - Department of Transportation Act, Section 4(f)
  - Farmlands
  - Hazardous Materials, Solid Waste, and Pollution Prevention
  - Historical, Architectural, Archeological, and Cultural Resources
  - Land Use
  - Natural Resources and Energy Supply
  - Noise and Compatible Land Use
  - Socioeconomics, Environmental Justice, and Children’s Environmental Health and Safety
  - Visual Effects (including light emissions)
  - Water Resources (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)
- **Cumulative Impacts** - The NEPA process requires projects that are connected, cumulative and similar (common timing and geography) be considered. The planning window and geographic limit to consider will be determined during preparation of the EA.



# Stakeholder Engagement Plan: Objectives

- The MAC formulated a project-specific stakeholder engagement plan to achieve the following objectives:
  - Strengthen its relationships with stakeholders
  - Foster collaboration
  - Build stakeholder trust and support
  - Proactively identify areas of interest and concern
  - Support and document a thorough and effective process
  - Formalize a system for reaching a wide variety of stakeholders
  - Develop a model for future similar processes
  - Create opportunities for MAC Board members to recognize stakeholder engagement in the EA/EAW process
  - Streamline agency review



# Interested Public and Community Engagement Panel (CEP)



- Interested Public: Members of the public who have an interest in the EA/EAW have a role to play and a responsibility for its outcome.
- Community Engagement Panel (CEP): The CEP is an advisory board representing major community stakeholder groups that is more closely involved in the EA/EAW project than the public at large.



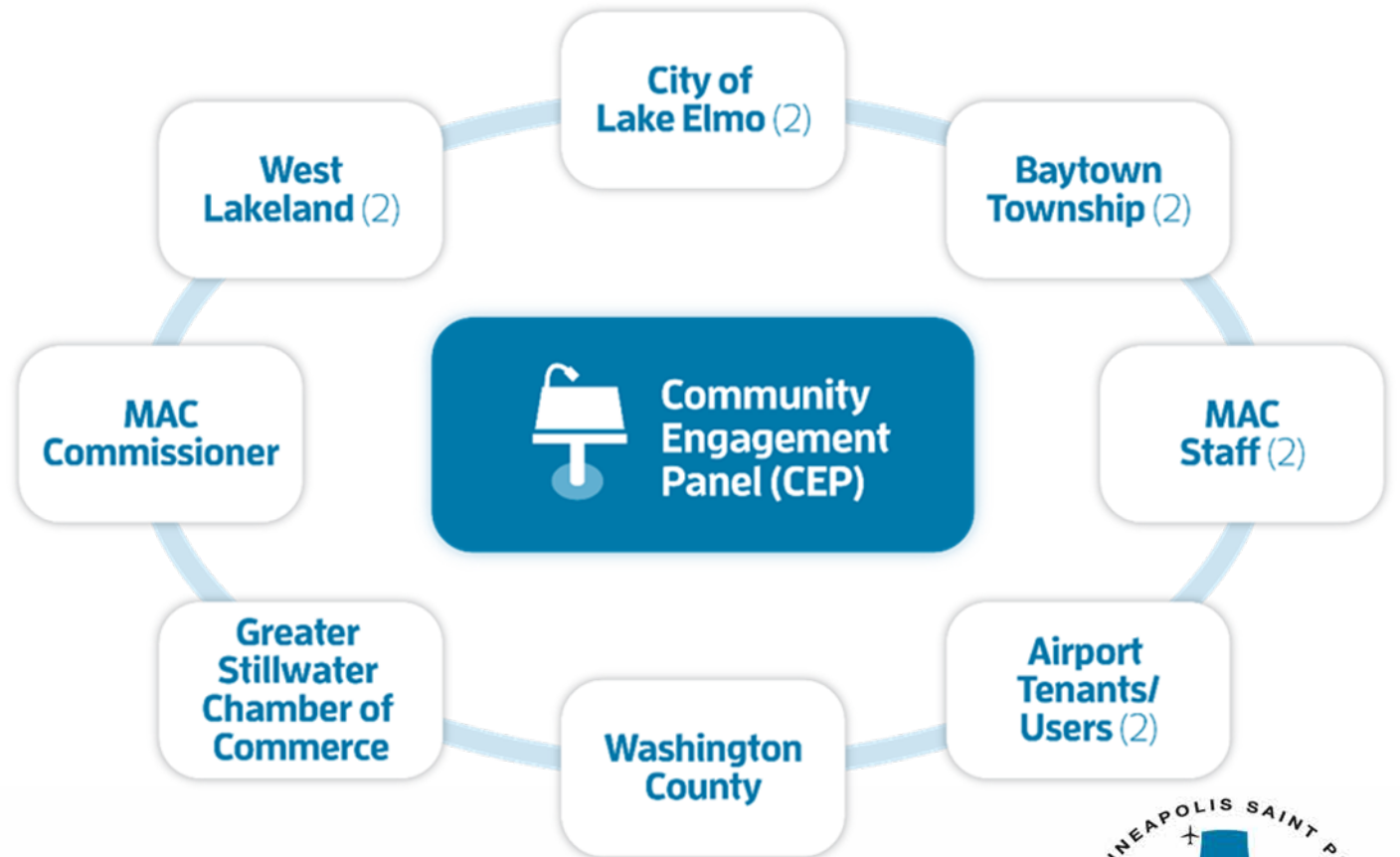


# Community engagement Panel (CEP)

## CEP Role:

Serves several important functions including:

- Representing a broad range of stakeholder groups in the EA;
- Receiving information about the EA/EAW and sharing it with constituencies;
- Providing input to the EA/EAW as the voice of key stakeholders; and
- Providing technical advice to the M&H Team.



**Membership Roster**  
**21 February 2017**

# CEP Membership

Representation	Name	Position
AIRPORT USER/TENANT (2)	John Renwick Marlon Gunderson	Airport User/Tenant Airport User/Tenant
MAC STAFF (2)	Neil Ralston Chad Leque	Airport Planner Director of Environment
CITY OF LAKE ELMO (2)	Stephen Wensman Keith Bergmann	Planning Director Resident
BAYTOWN TOWNSHIP (2)	Kent Grandlienard Stephen Buckingham	Board Member Resident
WEST LAKELAND TOWNSHIP (2)	Dave Schultz Mary Vierling	Board Member Resident
MAC COMMISSIONER (1)	Michael Madigan	District F, Lake Elmo Airport
GREATER STILLWATER CHAMBER OF COMMERCE (1)	Robin Anthony	Executive Director
WASHINGTON COUNTY PUBLIC WORKS (1)	Ann Pung-Terwedo	Senior Planner



# Messaging



## Messaging Strategies:

- Use of plain language – minimizing the use of acronyms and technical jargon that would likely be unfamiliar to a public audience
- Providing definitions of unfamiliar or technical terms when used in project messages
- Providing explanations of aviation terms and regulations and airport operations that are relevant to project messages
- Using easy-to-understand graphics, tables and charts in addition to narrative descriptions
- Reviewing public comments received in response to public messaging and providing additional explanation or clarification when needed through follow up outreach.



# Outreach Platforms

- In-Person Presentations
- Special presentations for elected officials
- Project Newsletters
- Project Website
- GovDelivery
- Public Notifications





ACCESSIBILITY | SITE MAP | NEWS & EVENTS | CONTACT US

Search

MSP Airport | General Aviation | Noise Program | Airport Authority

Airports | Airport Users | FBOs & Commercial Services | Advisory Council | News | Contact

# Lake Elmo Environmental Assessment

Overview | Community Involvement | Documents and Links | Frequently Asked Questions | Contact Project Team

## Overview

**Subscribe for updates!**  
[Click to sign up](#)

Subscribers will be sent monthly updates, links to newsletters and meeting notices.

The Metropolitan Airports Commission (MAC), owner of the [Lake Elmo Airport](#), is proposing to build a new 3,500-foot replacement runway for the existing 2,850-foot primary runway, Runway 14/32.

Based on the nature of the proposed project, a Federal Environmental Assessment (EA) and a State Environmental Assessment Worksheet (EAW) will need to be completed. The Federal EA will be developed in accordance with Federal Aviation Administration (FAA) policies and procedures detailed in FAA Order 1050.1F (and related documents) for compliance with the National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ) regulations. The State EAW will be developed in compliance with the Minnesota Environmental Policy Act (MEPA) and related Minnesota Environmental Quality Board (EQB) guidance.

The MAC has selected Mead & Hunt, Inc. to provide these environmental documentation services.

The MAC recently completed a [Long-Term Comprehensive Plan \(LTCP\)](#) for Lake Elmo Airport. Information from this document will be used, along with other data that will be collected and developed, to conduct the EA.

The environmental review will cover the following project components:

- Relocate Runway 14/32 by shifting it 615 feet to the northeast and extending it to 3,500 feet, including all necessary grading, clearing, and runway lighting.



## Lake Elmo Airport Environmental Assessment Work Begins

In 2016, the Metropolitan Airports Commission (MAC) adopted a Long-Term Comprehensive Plan (LTCP) for Lake Elmo Airport. The LTCP provides guidance and a roadmap for possible airfield improvements over the next 20 years. Specifically, the LTCP proposes the following improvements:

- Relocate and extend Runway 14/32 to 3,500 feet
- Realign 30th Street North around the relocated runway protection zone
- Construct new taxiways
- Convert the existing runway to a parallel taxiway
- Reconstruct and extend crosswind Runway 4/22 to 2,750 feet
- Upgrade instrument approaches to use newer technology

However, before these improvements can be made, the MAC needs to study the possible environmental effects associated with them.

Information developed for and presented in the LTCP provides the basis for the environmental review.

### The Environmental Process

With the LTCP complete, the MAC can now begin the environmental review process.

The National Environmental Policy Act (NEPA) process is used by the federal government to determine whether proposed projects—in this case the Lake Elmo Airport airfield improvements—will have significant environmental effects. In order to qualify for federal funding, the Lake Elmo Airport improvements project must undergo a NEPA review.

[CONTINUED ON NEXT PAGE](#)

COMMUNITY EVENT

Thursday,  
 May 11, 2017  
 6:00 to 8:00 p.m.  
 (Presentation at 6:30)

Stillwater Area High School, 2nd Floor Rotunda & Forum Room  
 5701 Stillwater Blvd N.  
 Stillwater, MN 55082

Project Website

[www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx)



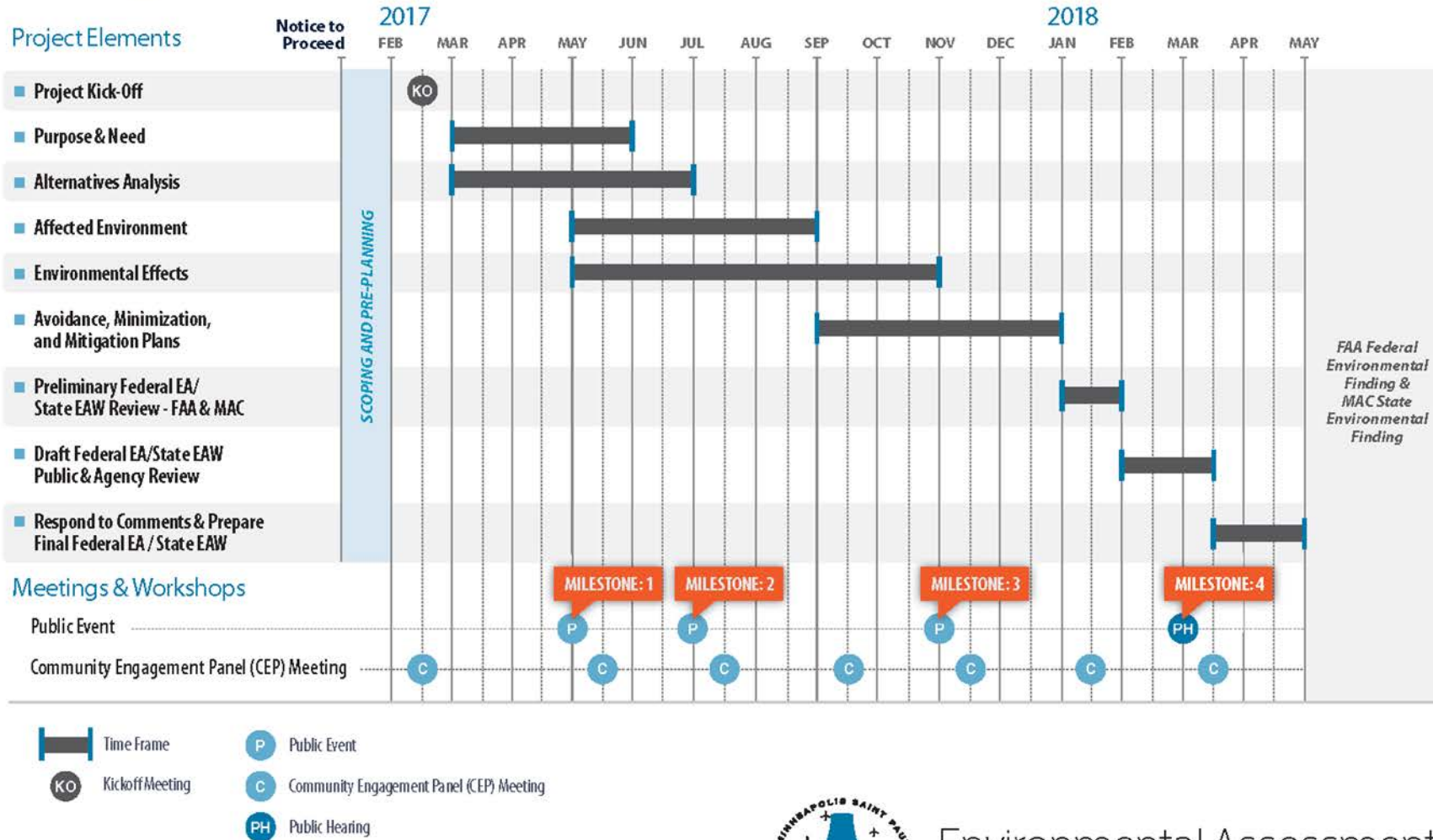
# Stakeholder Engagement Plan: Public Events & Outreach Platforms



- Public events will be held at four key project milestones:
  - Introduction to the Environmental Assessment process
  - Purpose & Need and Alternatives
  - Environmental Effects
  - Draft EA Public Hearing
- Project messaging platforms include the following:
  - Project webpage
  - Monthly project updates and periodic newsletters
  - GovDelivery email subscriber list
  - Press releases



# EA Project Timeline



## Environmental Assessment Lake Elmo Airport

# Next Steps

- CEP Meeting May 25, 2017
- Topics for the CEP meeting will include:
  - A recap of the first public event
  - Initial work on Purpose & Need and Alternatives
- Complete Purpose and Need
- Complete Alternatives Analysis
- Public Meeting #2 – July 2017







**Public Event #2**  
**for the Lake Elmo Airport Environment Assessment (EA)**  
**and State Environmental Assessment Worksheet (EAW)**

August 17, 2017 – 6:00-8:00 pm

Oak-Land Middle School

**Agenda – Design Alternatives**

- A. **6:00 Open House** – Project Orientation (Cafeteria)  
Visit with MAC representatives to learn about the airport EA activities
  
- B. **6:30 Alternatives Presentation** (Auditorium)  
Learn more specifics regarding the alternative scenarios being considered
  
- C. **7:00 Presentation Q&A** (Auditorium - See reverse side for format)  
Questions regarding the alternative options presented
  
- D. **7:30 Community / MAC One-on-One Engagement Session** (Cafeteria)  
Discuss concerns, ideas and opportunities with MAC representatives

**Previous Public Engagement Meetings**

<u>Date</u>	<u>Topic</u>
May 11, 2017	Introduction to the Environmental Assessment Process

Summary

Presentation provided overview of: MAC regulatory responsibilities per FAA and state legislative mandates, Lake Elmo improvements purpose and needs; introduction to analyzing alternatives; the environmental analysis categories; and the stakeholder engagement plan.

Attendee concerns included aircraft noise, 30<sup>th</sup> Street North relocation considerations, pilot safety, airfield lighting, project funding, and environmental effects.

**Future Public Meetings** (Dates and times to be determined)

November 2017

March 2018

## **Metropolitan Airports Commission – Lake Elmo Agenda**

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### **MAC Aviation Responsibilities**

The Metropolitan Airports Commission (MAC) is mandated by the state legislature to oversee the operation and ongoing maintenance of 7 metro airports including the Minneapolis-St. Paul International Airport and 6 reliever airports: St. Paul Downtown, Anoka County-Blaine, Flying Cloud, Airlake, Crystal, and Lake Elmo.

The MAC's responsibilities, among many others, include overseeing the efficient, safe, and economical handling of air commerce throughout the metropolitan aviation system. Much of this work focuses on enhancing safety, complying with federal design standards, and improving operational capabilities for aircraft pilots, consistent with MAC's statutory mandate.

### **Public Engagement**

It is essential we receive constructive input, concerns and ideas to assist us in providing an airport meeting the needs of our regulatory mandates, the aviation community, and local community stakeholders.

### **Presentation Q&A Format and Public Comments**

Public engagement has been and will continue to be an important consideration for the MAC during this project. Immediately after the meeting's formal presentation, attendees may ask questions related to the presentation. We understand you may have additional questions requiring more detailed responses that are not possible during the presentation Q&A.

For us to gain the most from public input, we encourage talking with a MAC representative during the One-on-One Session after the presentation so we may hear from everyone and have those detailed discussions around your ideas and concerns.

### **Presentation Q&A Format**

To allow as many people as possible to have a chance to comment on the presentation during the Q&A period, we ask you to please keep your questions or comments to two minutes so we can provide time for other presentation questions. We expect all participants will be respectful of one another and of each other's comments. MAC representatives will be available to provide additional information during the One-on-One Session following the presentation.



# Lake Elmo Airport

Federal Environmental Assessment/State Environmental Assessment Worksheet (EA/EAW)

## Public Event

*Thank you for attending tonight's public event for proposed improvements at the Lake Elmo Airport.*

*Public engagement is important to the Metropolitan Airports Commission (MAC) as part of its evaluation of this project.*

*Based on comments received at previous public meetings we've identified three categories of concerns associated with this project. Responses to those concerns can be found in this handout. ■*

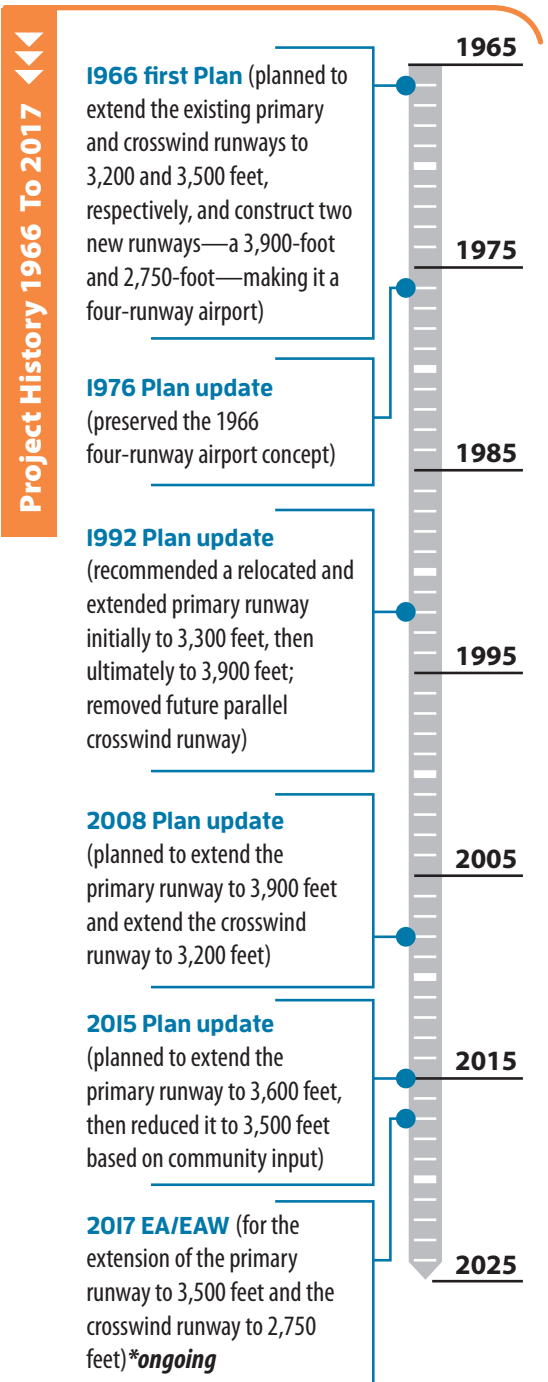
## Justification for the Airport Improvements

Almost 75 years ago, the State Legislature created the MAC to promote efficient, safe, and economical handling of air commerce and to fully explore how the seven-county metropolitan area could be developed as an aviation center. This means the MAC is responsible for ensuring our airports are as safe as possible, their infrastructure is up to regulations and standards, and that they are accessible to pilots. The MAC is also responsible for promoting the state's environmental policies and minimizing exposure to noise and safety hazards for airport neighbors.

### Purpose & Need for the Airport Improvements

**Why is the MAC proposing these improvements?** The airport's most recent Long Term Comprehensive Plan (LTCP) identifies deficiencies with the existing airfield. The LTCP provides the foundation for the environmental review's Purpose & Need statement, which establishes goals and objectives that explain, in clear terms, why the project is needed. The purpose of the Lake Elmo Airport improvements are threefold: **update the airport's failing infrastructure; enhance safety for airport users (pilots) and neighbors; and improve operational capabilities for the types of aircraft using, and expected to use, the airport.**

The airport improvements will address the following deficiencies (the "need"): **existing runway pavements are deteriorating and, for safety's sake, need to be replaced; the primary runway has incompatible land uses within its runway protection zones (RPZs) including a railroad and two public roads; the existing runway lengths do not meet the needs of current aircraft operators and their aircraft; and the airport lacks the most current navigational technology for landing aircraft.**





**How is the MAC fulfilling its responsibility to minimize exposure to noise and safety hazards for airport neighbors?** The 2015 LTCP Update process began with an examination of the previous plan (2008), which recommended an initial 3,200-foot primary runway, with an ultimate extension to 3,900 feet, and a 3,200-foot crosswind runway. The 2015 planning process determined that a 3,900-foot runway is not necessary to meet the objectives of the plan for enhancing safety and improving operational capabilities, and rather recommended extending the primary runway to 3,600 feet and the crosswind runway to 2,750 feet. These lengths are based on FAA guidance and manufacturers' performance charts for several aircraft using Lake Elmo Airport. In the end, after receiving additional community input, the final recommended primary runway length was and is 3,500 feet, a length that will sufficiently serve the aircraft types operating at the airport today – but with a higher margin of safety. This shorter runway length also allows 30th Street North to tie in with the existing four-way intersection at Neal Avenue North and eliminates the need for a new intersection – a point of concern for the community. Additional 30th Street North concepts were added during this environmental review in order to address the primary concerns expressed by the Community Engagement Panel: travel time and safety. The new concepts effectively reduce travel time compared with the original plan, and softened the curve; however, the proposed concepts were not supported by some members of the panel who expressed concerns about introducing a cul-de-sac and potentially a round-about in the roadway design. ■

## Impacts from a Relocated & Extended Primary Runway

The airport improvements call for the primary runway to be relocated 615 feet to the northeast and extended by 650 feet to the southeast. These runway improvements are not expected to change the types of aircraft using the runways nor the frequency of flights. In the relocated and extended primary runway scenario, the federal threshold for significant noise impact does not reach any residential homes and remains on airport property. The MAC has a voluntary Noise Abatement Plan in place to promote aircraft operating procedures that help reduce aircraft noise in the neighborhoods surrounding the airport. The details of this noise abatement plan will be revisited as part of this environmental review. The improvements are designed to increase the margin of safety for and accommodate the needs of aircraft operating at the airport today. The runway's final length would not be sufficient to meet the requirements of most large aircraft. (See the *Typical Runway Length Requirements for Different Types of Aircraft* infographic in the newsletter.) The realigned primary runway will not substantially change aircraft traffic patterns, nor do we anticipate that these changes will have an impact on property values. We are not aware of any property devaluations that can be attributed to recent airport improvements at the Flying Cloud or Anoka County-Blaine airports. Neighborhoods exist near both airports and, in both cases, the runways were extended to 5,000 feet to accommodate increases in corporate jet activity.

The final runway length and location minimize impacts to wetlands, wildlife, trees, and residents when compared with other alternatives that meet the Purpose & Need. A full analysis of environmental impacts will be presented at the public event, tentatively planned for November 2017.

**Note: no local sales or property taxes will be used to fund airport improvements. ■**

## Impacts from a Realigned 30th Street North

The proposed plan calls for 30th Street North to be realigned around the runway protection zone (RPZ), effectively lengthening the road. While this requires the street to have a reduced speed limit (to 30 miles per hour), drive times are expected to increase less than one minute in either direction. The realigned road has been designed to meet local and State department of transportation standards for a 30-mph road, given existing and expected traffic levels. The realignment does not result in additional traffic on Neal Avenue. The MAC will pay for construction of the realigned section of 30th Street North, which would move the current shared boundary between West Lakeland and Baytown Townships fully into West Lakeland's jurisdiction. However, the Baytown Township draft 2040 Comprehensive Plan document states: *"Baytown has offered to continue the current shared maintenance if the land area between the relocated road and the Baytown Township boundary becomes part of Baytown Township after the roadway is relocated. The boundary relocation would result in the entire airport remaining in Baytown Township."*

**Note: no local sales or property taxes will be used to fund the 30th Street North realignment. ■**

## FAQs Updated

**Based on input received at the public event in May 2017, we have updated the frequently asked questions (FAQs) on the project website. Please visit the website listed below for more information. ■**

Project Website 

[www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx)



## LAKE ELMO AIRPORT FEDERAL EA / STATE EAW

# Public Event #2 Meeting Minutes

Oak-Land Middle School  
August 17, 2017

### Agenda

- 6:00 – 6:30 P.M. – Open house with informational boards and an opportunity to visit with MAC representatives to learn about the Lake Elmo EA/EAW activities.
- 6:30 – 7:00 P.M. – Presentation on the specifics regarding the alternative scenarios being considered
- 7:00 – 7:30 P.M. – Presentation Q&A regarding the alternative options presented
- 7:30 – 8:00 P.M. – Community/MAC one-on-one engagement session to discuss concerns, ideas and opportunities with MAC representatives

### MAC/Mead & Hunt Attendees

Chad Leque  
Dana Nelson  
Neil Ralston  
Joe Harris  
Patrick Hogan  
Melissa Scovronski  
Brad Juffer  
Amie Kolesar  
Gary Schmidt  
Michael Madigan  
Evan Barrett  
Colleen Bosold  
Stephanie Ward  
Chris Rossmiller

### Representing

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission, Lake Elmo Airport Manager  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
MAC Commissioner District F  
Mead & Hunt  
Mead & Hunt  
Mead & Hunt  
Mead & Hunt

*The attached report represents this writer's interpretation of items discussed during the meeting. Any corrections or additional information should be brought to our attention for clarification.*

Presentation slides and informational boards presented at this meeting, as well as the agenda, newsletter and a handout provided to the public, are available on the project website at [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Documents-and-Links.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Documents-and-Links.aspx).

### **The purpose of the meeting was to:**

- Present the alternative scenarios being considered for proposed airfield improvements at Lake Elmo Airport.
- Provide an opportunity for community members to ask questions, discuss concerns and share ideas with MAC representatives and for MAC representatives to respond to inquiries from community members.

### **Items discussed were as follows:**

Chad Leqve, Director of Environmental Programs for the MAC, welcomed and thanked everyone for coming. After introducing himself, he introduced key project team members who comprised the Q&A panel: Dana Nelson (MAC Manager of Noise & Environmental Programs, who is heading up the stakeholder engagement efforts), Evan Barrett (Mead & Hunt project manager), Neil Ralston (MAC aviation planner) and Joe Harris (Lake Elmo Airport Manager).

Chad then noted that the MAC is trying to evolve and improve the stakeholder engagement process based on previous community feedback, and pointed out some changes made for this event. One change that Chad mentioned is a top concerns sticker board at the sign-in table – each attendee had the opportunity to place one sticker next to their top concern regarding the proposed improvements at Lake Elmo Airport, and the concern with the most stickers will be addressed following the alternatives presentation. Another MAC change is addition of a moderator for the evening to help make sure that all voices are heard and everyone has a chance to ask their questions and get a response.

Chad then introduced the moderator, Todd Streeter. Todd has served the St. Croix Valley area in a variety of roles, including as President/Executive Director of the Greater Stillwater Chamber of Commerce; Mayor of the City of Lake St. Croix Beach; cofounder and chair of the Lower St. Croix Valley Foundation; and a board member of the Stillwater-Oak Park Heights Convention & Visitors Bureau. Chad stated the MAC has been impressed with his record and hopes the community finds what he brings to the process beneficial. He then turned it over to Todd.

Todd thanked everyone for coming and taking time out of their schedules to be at the meeting. He stressed that all questions, input, concerns and comments should be heard. He introduced the agenda for the evening and pointed out information regarding the Q&A on the backside of the agenda. He also stated that the Q&A should be specific to the alternatives information covered during the presentation, so everyone has an opportunity to learn about the new information being presented. He also pointed out the handout has information about some of the other concerns that have been expressed in past meetings. Finally, he introduced the one-on-one engagement session opportunity following the Q&A session for community members to speak directly with MAC representatives about questions or concerns beyond those related to the presentation. He closed by stating that all of these efforts are being made to try to get as much information to and feedback from everyone at tonight's meeting. He then turned it over to Evan Barrett.

Evan Barrett, Mead & Hunt's project manager and lead aviation planner for the environmental assessment, began the presentation, acknowledging that many people in attendance have followed the Long-Term Comprehensive Plan that was completed last year, and noted that this is a continuation of that process. He thanked those people for their continued interest in the project. He also acknowledged that others may not be familiar with the project and that this might be a lot of new information for

## Meeting Minutes

those people. He encouraged those people to talk to him or other MAC representatives after the presentation.

He then gave a presentation covering:

- The project timeline – where we've been, what's been accomplished so far, and where we're going
- An overview of the purpose and need (or the justification) of the project
- The range of alternatives that are being considered in this Environmental Assessment (EA)/Environmental Assessment Worksheet (EAW)
- The alternatives evaluation and screening process, and the resulting preferred alternatives that came out of that process
- Next steps – the team will be evaluating the environmental effects for the preferred alternatives. Evan also announced the next Community Engagement Panel (CEP) meeting will be October 19<sup>th</sup> and the third public event is tentatively scheduled for November.

A copy of this presentation can be found at: [metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-Public-Event-presentation.aspx](http://metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-Public-Event-presentation.aspx)

Evan thanked everyone for attending and said he looked forward to questions during the Q&A session or the one-on-one engagement session in the cafeteria. He then turned it back over to Todd.

Todd then said that before the Q&A session began, the team would like to address the top concern community members voted on from the top concerns sticker board at sign-in. He turned it over to Dana Nelson.

Dana stated that she was actually going to address the number two concern on the board, as the item that got the most votes on the board was "I don't have concerns related to these improvements." The number two concern identified was "justification for the project." Dana mentioned this idea came out of some feedback from the CEP and is a concerted effort to try and understand why people are taking time out of their personal schedules to come to these meetings and learn more about the project. She said the MAC has heard a number of concerns and they boil down to these three areas.

Dana mentioned that Evan had touched on the Purpose & Need of the improvements in the presentation, which is essentially the justification. The justification came out of a series of deficiencies identified in the Lake Elmo Airport LTCP; the first being that the pavement needs to be replaced; the second being that the runway protection zones (RPZs) have some land uses within them that the FAA considers incompatible. The FAA wants to see airports controlling the RPZs for both the safety of those using the airport and the safety of those on the ground. Those things, at a minimum, need to be addressed. The RPZ issue is the reason the MAC is considering the shift of the runway to the northeast. This would put those RPZs on MAC property; it's a plan the MAC has always intended to implement, which is why the MAC bought property to line up a primary runway in that configuration so the MAC is best using the property it already has to control those areas off the runway ends. The third element of the justification is to better accommodate the users that are using the airport today – that's the reason for extending the primary runway. She pointed out a graphic in the newsletter and on one of the boards in the cafeteria showing the runway length requirements for different types of aircraft. She noted this was some of the methodology and science that went into establishing the preferred runway length of 3,500 feet, which had initially been set at 3,600 feet in the LTCP. The MAC heard significant community concerns about that length during the LTCP process, and the preferred alternative was updated through



that process to 3,500 feet. The last element of the justification is to update the navigational technology for arriving aircraft to make sure that the MAC airport system stays up to date with today's technologies. She then turned it back over to Todd for the Q&A. Todd reminded the audience that the handout received at sign-in has information that should answer many questions regarding the top community concerns.

Todd then opened the Q&A session and informed the audience that a staff member would be walking around with a microphone for people to use when asking their questions so all can hear. He requested that those asking questions state their name and address and keep questions or comments to two minutes each so that the panel could get through everyone's questions. He stated that if time ran out during the Q&A, there would also be the one-on-one engagement session following for further questions and discussion.

**The presentation Question & Answer session that followed is described below.** *(Responses are indicated in italics.)*

- Ann Bucheck, resident of City of Lake Elmo. When you're talking about how you're going to go ahead into the environmental assessment you said you were going to use B1 as your thing to look at, aren't you also going to look at no change at all beyond maintaining what is there today? *Evan Barrett responded that the no action alternative is essentially a no build alternative beyond what's existing at the airport today. He said there's no alternative on the table that would involve doing nothing whatsoever as far as maintaining the airport. Ann responded, then you should be using that also as your comparison – that's what you said at the beginning. But then you got to the end and you didn't include it. I'm hoping that you will be including that. Evan responded yes, and explained that the no action alternative will provide the baseline. It will compare the environmental effects of maintaining the airport as-is (what's being referred to as the "no action alternative") to those of Alternative B1 and the other preferred alternatives on the list. He also stated that the no action alternative was included on the Preferred Alternatives slide near the end of the presentation listing the alternatives that would be carried forward for full environmental review.*
- Molly Olson, resident of West Lakeland Township. I'm wondering if you can clarify that answer a little bit more. It's very confusing for me. At the last meeting I went to, all the community members there were in agreement that your language of "no change or no action" was very confusing for the average person, and I was hoping that I would see a different terminology in this presentation. You're not speaking to the FAA that uses that terminology. It seemed like you'd said that was not going to happen (just repairing the runway as is), but now in your answer to her it sounds like you're saying it is an option? It's very confusing. *Evan Barrett responded that the no action alternative is the same as a no build or a no expansion alternative, if you want to think of it that way. He said "no action" is a term the FAA requires we use in these documents. He explained the intent of the no action alternative is to provide a baseline for comparison with the preferred alternative, as the preferred alternative must be compared to something in order to identify what the environmental effects are. The no action alternative provides that basis for comparison. Evan noted that the no action alternative does not meet the purpose and need, but will be evaluated across that full range of environmental categories that the federal and state regulations require we look at.*

- Rick Weyrauch, Baytown Township Supervisor. I would just like to try and answer her [the previous] question. I'm on the Baytown Township Board. The no action/no change alternative is included here [referring to the presentation slides handout]. *Evan Barrett responded, "correct. It is included in all the tiers of analysis. We have it in the Tier B table and Tier C table for comparison purposes."* Rick then said, but it had four categories where it did not meet the objectives, so that's why it did not filter down through for the middle analysis, correct? *Evan reported that it's still included in the Tier C analysis even though it doesn't pass that Tier B test. He pointed out that it's outside the funnel [graphic].* Rick then said, but I do have a question as well. You have a certain amount of wetlands that you have being filled in for both alternatives? *Evan Barrett asked if he was referring to the finalist alternatives in the Tier C evaluation?* Rick responded, yes. *Evan then confirmed, yes, that's right.* Rick asked, do you have to offset and provide wetlands in some other place? What's the environmental cost for filling in that wetland? What's required to get permission to do that? *Evan responded that there's a permitting process under the US Clean Water Act that requires replacement of any wetlands that are filled in. For a federal action of any kind, there are certain ratios that have to be applied. For this area of the state, the replacement ratio is 2.5 to 1. For example, the Tier C analysis table for Alternative B1 shows a wetland impact (fill area) of 1.85 acres. He explained that you'd take that number times 2.5, which would be 4.625 and basically that's the number of acres that would need to be replaced somewhere else. He said there are different ways to accomplish that. Ideally, they'd be replaced within the same watershed, to provide the same function as those existing wetlands. He then reported we have not gotten to the point yet of identifying exactly what we're proposing to do as mitigation, but that will be considered in the coming months as part of this process.*
- Jack Ritt, resident of Baytown Township. As far as the wetland issue is concerned, it's a lot easier for a duck or a goose to find a new home, relocate, then it is for the poor citizens that are affected by the expected changes. That's a comment. The one-on-one that we're invited to go to is just nothing more, or less than, a divide-and-conquer, as far as I'm concerned. This is really, I think, a ruse. Let me give you an example. I had a company, and we decided about 20 or 30 years ago, that we were going to have uniforms. We had 100 employees and you can imagine the variety of opinions they had. It's like if you had five economists in this room, you could get five different answers. The only way to minimize that and make everyone happy was to pick out three styles of uniforms: two that we didn't like, and one that we did like. And you know what was amazing? All the employees picked the one that we liked, because the other ones were so bad. I think that's what's going on here and people don't realize what's really happening. All of this has been predetermined and I think it's very unfair to the community welfare that exists today and going forward. This expansion is not necessary – and I agree with you – the runways need improvement, there is no question they need to be upgraded, but I think this expansion goes way beyond what is necessary. We have a new bridge across the river now, it's a lot easier if you want to get to a big airport with bigger planes and more safety, it's just a few minutes from here by air. That's the end of my comment. *Todd Streeter thanked him for his comments.* Jack then said, I do have one more question. On a waterway, a sailboat has a right of way over a motor boat. In the air, how about the balloonists that use the air around here – how are they affected by your proposal? *Joe Harris answered that the balloons have the right of way and that the balloons that operate near Lake Elmo Airport will not be impacted by the proposed expansion.*

- No name or address given. Does this mean we will have more jet traffic over our homes? I live in West Lakeland. *Dana Nelson responded that is not the intent of the proposed improvements. She stated that there are a handful of small jet operations that take place at this airfield over the course of a year, and that is not anticipated to pick up to a great degree. Right now, it comprises less than one-tenth of a percent of the operations, and it is anticipated in the next 20 years to still be around one-tenth of one percent, and concluded by saying it's not a drastic increase in the jet traffic that we're expecting. She stated "the jets we do anticipate would be the small, lighter-type jet operations, nothing like what a 3M would bring – a Gulfstream or a Learjet or anything like that – it would be probably a Mustang if you're familiar with those types of small, under 10-seat light jet aircraft."* Neil Ralston then reiterated that the length the MAC is proposing for this runway is designed for small, propeller-driven airplanes. He said, "If we were designing a runway for regular use of larger, corporate jet aircraft, we would certainly be proposing a longer runway length than we're proposing. That's not what we're intending to do with this runway. It's to accommodate propeller-driven airplanes with less than 10 passenger seats, which is a category of aircraft designated by the Federal Aviation Administration."
- Barry Dayton, resident of the City of Stillwater. I'm a pilot/aviator currently based out of Lake Elmo. Just a comment, I want to say that I know there is no jet fuel available on the field today and I believe there are no plans for adding jet A or jet fuel in the foreseeable future, am I correct in that? *Joe Harris responded that that was correct; you cannot purchase jet fuel at the field today, and he was not aware of any future plans of making jet fuel available at the airport.*
- Brad Cornell, resident of West Lakeland Township. Looking at the plans and your \$8.3 million construction cost, how is it justified to spend almost \$800,000 in planning – I asked for the data back in May which you provided me the information of \$326,000 for the initial planning, and now \$401,000 for Mead & Hunt to do the environmental impact, how can you justify spending almost \$1 million just to get to the point where we are today, to spend another \$8.3 million to an environment, a community that doesn't want this expansion and leave our 30<sup>th</sup> Street straight. It affects 1,700 people a day and that's been documented by Washington County traffic. You're affecting a ton of people for 200 aircraft. I've tracked the drive time, it's 20 minutes, door to door, to New Richmond, one stoplight, two stop signs. How can you justify this kind of expense? I can see the justification to do this rework, shut down the runways, they get new runways, do the renovation just to replace the existing runways but those pilots are going to go somewhere else cause they're not going to sit and wait for that amount of time. How can you justify this for the community? *Chad Leque answered, regarding this question of the catalyst for the project in the first place, it really goes to the MAC's legislatively directed mandate to support aviation in the metropolitan area; which is to provide adequate and safe facilities for purposes of air transportation – both of passengers and cargo. He made the comparison that much like MnDOT is the purveyor of street transportation infrastructure in the state of Minnesota, the MAC (within the metropolitan area) is charged with the duty to make sure there exist adequate facilities for those that want to utilize air transportation. He explained that, because these airports are considered public assets, the MAC maintains them as such. They are public assets, though, that do not use general tax dollars. He noted that money that's used to plan, develop and maintain these facilities is generated by aviation. He further stated the money that goes into the planning work referenced in the question comes from the very people that use the facilities the MAC maintains in their airport system. Regarding the questions about the expense the MAC puts into planning, he said that when the MAC enters into planning projects*

*like this, they take them seriously, and he didn't think this was unique to airports. He said, "By doing that, we want to make sure we're using the best amount of expertise that's available in that space to do an adequate job of evaluating truly what are the needs and what is the most efficient way to do it, while minimizing our environmental impact, and that's where we look to firms like Mead & Hunt and others that we partner with, much like cities do when they do their planning work – to take a look at what the options are, to evaluate them from an environmental perspective. There's nothing unique here, I believe, with regard to this type of a relationship and this type of a team when it comes to a project like that." Chad also mentioned that a portion of the budget referenced in the question, regarding planning, goes to some additional resources as it relates to the MAC increasing its efforts to be better at engaging the public. He referenced his opening remarks, in which he noted the MAC is trying to evolve as the process moves along. He said, "For those of you at the first meeting, I asked for your patience, and your partnership if you're willing, with us as we go through this process, because we really are trying to evolve it and make it better. And to do that, we have brought to bear some additional resources with the budget. Mr. Streeter is a great example of that." He said the MAC wants to be responsive in these processes, to people who have concerns with what the MAC is doing, and that they make sure that they are turning over every stone and doing all they can to be creative to try to reduce the impacts as much as possible while still providing adequate infrastructure at their airport facilities for the travelling public and people using their aircraft at the airport. He then noted that "When we talk about the evolution of the concept of expansion at Lake Elmo Airport – it's been a long journey." He referenced one of the boards at the open house and a graphic in the handout shows the discussion dates back to the 1960s. At that time, it was anticipated a 3,900-foot runway would be needed at Lake Elmo Airport to meet the needs of the aircraft category Neil Ralston talked about earlier as defined by the FAA – the less than 10 seat, light aircraft category. He continued, "Now if we move through time, to the point we're at today, that 3,900 feet, as you see this evening, has shrunk – for good reason – as part of a process – the public process. That 3,900 feet, going into the last long-term comprehensive plan, was sized back to 3,600 feet, as you saw tonight in option B, and then before the conclusion of that process was again cut back to 3,500 feet. That was, in large part, in response to some very valid concerns that were raised by the community, with regard to the 30<sup>th</sup> street realignment, and specifically the intersection with Neal Avenue and where that was occurring, in the environment of the airport. This has been a long dialogue. It's had a lot of twists and turns, but I do believe, if we take a look at the record (as I was mentioning to one individual tonight who was sharing valid concerns about the airport, it was clear there was nothing I was going to say that was going to make her comfortable with what we're looking at here at the airport because it's not the no action alternative – and I understand that), it's not been a black and white process. It's been a process that's evolved over time, and it's resulted in a scaled back option in terms of providing adequate facilities for our aircraft operators at the airport to provide them with an additional margin of safety, a little more ability to provide a bit more utility for the aircraft that they're operating—maybe to carry a little more fuel than they do today with the shorter runway, and also reconstruct the runway at the same time, and to Dana's point, provide RPZs that are clear and have no obstructions in them. So there's a lot of different targets we've been trying to hit in the process. There are tangible points in this process where you can say that there actually were things that happened because of the dialogue. It's a fact if you look at the record. The most recent one we touched on this evening, but the one before that – going from 3,600 to 3,500 feet, was a direct*



accommodation by the MAC to try to do what we can to get the 30<sup>th</sup> Street alignment right. We went a step further with the CEP and we had a very candid dialogue with the community engagement panel about what are the things we should look at with regard to the 30<sup>th</sup> Street alignment to try and make it more palatable, make it more acceptable to the community. As Evan pointed out today, two things were raised: travel time and safety. So the planning team went on a mission to look at new designs, they actually found options that moved those needles in the right direction. They decreased the travel time, they improved the field of view needed to navigate intersections. We brought that back to the CEP and after weighing it, talking about it, the decision was that we didn't want to move forward with those alternatives and we respected that, but we put the time and resources in to be responsive to that committee, and that takes resources, as you've pointed out. It's a difficult task sometimes in that it is a balancing act." He reiterated that the MAC comes to the discussion with a mandate from the Legislature that cannot be denied; however, it is very clear in the MAC's legislation that as well as making sure that they have adequate facilities that are safe, they're also supposed to try to reduce the environmental impact. He noted that, as the Director of Environmental Programs at the MAC, that is something he takes very seriously. He went on to share one of the things discussed at the last CEP meeting are efforts that are being undertaken to design and implement enhancements to the voluntary noise abatement plan at Lake Elmo Airport. Dana Nelson's team is already working on implementing communication materials for the pilot community at the airport that highlight the MAC's voluntary noise abatement plan, such as inserts they can put in their pilot logbooks for reference while they're using their aircraft. He noted that Joe Harris, the airport manager, has been nice enough to put funds into developing signs that will go up on the airfield requesting that pilots fly neighborly. Chad said the point is that these things don't happen in a vacuum, and that his hope is that "once we get through the process, whatever the result is, we can have a continuing dialogue between the MAC and our community partners on how we can continue to advocate for neighborly operation of the airport. You have our commitment we will continue to do that, as a member of the community. We'll continue to try to work through the issues and do the best job we can in meeting a lot of stakeholders' concerns and issues on the topic." Neil Ralston then clarified that between the planning and environmental [funds spent] it's closer to \$750,000 than \$1 million. He also pointed out there are requirements the MAC must meet based on mandates from the FAA regarding planning and environmental work, such as airport layout plans, engineering drawings, forecasting and getting survey data out on the airfield, to name a few. He commented that that work is not cheap and said he didn't believe the MAC was being frivolous with their planning money. He speculated that those who do this type of work would probably think that with the money the MAC is spending, they've actually got a lot of value out of a fairly small amount of funds when compared to what other airports do and how they do it.

- John Krack, resident of Fridley. I fly out of Anoka County-Blaine Airport. Next month will be the 50<sup>th</sup> anniversary of getting my pilot's license. I've flown out of MAC airports for almost all those 50 years. I've been through probably three or four of these long-term comprehensive plans and this one is far and away the most comprehensive, the most thorough and the most transparent that I've ever seen. Previously what would happen is MAC would come up with a plan, they'd hold a hearing to get some input, they'd go back and make a few tweaks to the plan, and then pretty much do what they wanted to do. But I've seen what they're doing now with Lake Elmo, what they're doing with Airlake and also with Crystal, and they're taking the feedback, they are

making changes and they are trying to walk a fine line between their mandate and the concerns and the utility of the local communities and stakeholders. So, this is a process and in my experience, my observations, this is much more open than what's been done in the past. So we are very fortunate to have MAC's commitment to work with the communities, work with the other stakeholders to at least try and come up with a viable solution for these airports. Back in the day, these airports were out in the boon docks so to speak, nobody much cared about what happened and what we did and what kind of airplanes were on them, but as the communities have grown around the airports and we've also seen the airport tenants and people become more sensitive to the issues, MAC has made a commitment to work with the communities – and by the way, the pilots, we get it – we realize that we have to be good neighbors and be flexible how we operate our aircraft, how much noise we generate, what we fly over, because we realize these people are our neighbors – that you folks are our neighbors, and it's important we maintain those relations. And I applaud MAC for making the commitment and/or making both financial and the administrative commitments to be as transparent as they are, and to work with the communities to come up with solutions to the concerns. And I should say that I speak for myself and not for the MAC.

- Mick Kaschmitter, resident of West Lakeland Township. I've been very, very, very involved in a neighborhood group that's been in place for a couple years, we've engaged the major stakeholders in this and I just wanted to dispel the rumor to everybody: we have never proposed, we've never really discussed, nor would we want the airport to close. I think that's a rumor that's out there and I just want to make sure that everybody knows that we have never proposed or been for that. Also, I guess, to cut to the chase, do whatever you have to do on the airport grounds, but leave 30<sup>th</sup> Street alone. That's our primary concern and we just don't want it, at all.
- Dave Schultz, West Lakeland Township Supervisor. I have a comment. It sounded like MAC was taking and giving us something by going from 3,900 feet down to 3,600 feet. By today's standards, 3,900 feet would not be allowed, as that original 3,900 foot plan had 30<sup>th</sup> Street going through the RPZ and putting in a 3,900-foot runway, so there's no way that 3,900-foot runway would be an option today. Second, the runway protection zones are shrunken down from the 3,600-foot plan to what they are today – same size they are today, as you showed on the runway. So that's how things have gotten smaller – going from 3,600 to 3,500 you've also shown the RPZs as they are current today. So, just a comment. Thank you.
- Ann Bucheck, resident of City of Lake Elmo. I have two questions. One is when you're talking about the no build alternative, would that include redoing the runway so that it's in good shape for the pilots, and you also include upgrading the instrument approach procedures, because I don't think that anyone is opposed to that, and maybe that should be included in your proposals. The other thing is, I would like to know what size jet could land at the airport today. *Evan Barrett answered the first question, saying that the no action (or no build) alternative does include reconstructing the runways to bring them up to a safe, operable and long-term usable condition. It does not include upgrading instrument approach procedures due to obstacles in the approaches to some of the runway ends. There are also minimum requirements for runway length the FAA looks at in terms of types of approach procedures, so the runway length plays into that as well. In answering the second question, Evan referred back to what Dana Nelson had discussed earlier in the evening, that it is the very smallest class of jets that are out there, most would be less than 12,500 pounds, like the very-light jet Citation Mustang, or the Eclipse*

manufacturer makes a similar type of aircraft. He noted that, in some situations at a very low payload or fuel load, there are some smaller business jets above 12,500 pounds, that may be able to use the runway, but they would have to take off nearly empty, so the runway wouldn't have much use to them. They could land on it, but then they couldn't take off unless they offload fuel, passengers or cargo. He explained, that's where the usefulness of the runway becomes limited for those jet aircraft. Neil Ralston added that there was a [board out in the lobby showing Runway Length Needs](#), acknowledging that not everyone would necessarily know what the names of the different aircraft are, and said the board shows photos of some of those types of aircraft that were being talked about. It was also pointed out that the runway length graphic is in the [August newsletter](#) that was also handed out at the sign-in table. Neil then emphasized that the runway length is designed for the small propeller-driven airplane fleet, not a jet fleet. Ann then questioned, and if it's expanded, if you extend the runway, will there be bigger jets coming in? Neil clarified that his previous response was in regard to the proposed, extended runway length of 3,500 feet, reiterating, "The runway length we are proposing is designed to meet the needs of propeller-driven airplanes. That does not mean that a jet might not choose to land on it once in a while, like they do today, but it is not intended for regular use by jet aircraft."

- [Name inaudible], Pilot based at Airlake. I've been a pilot since 1969. I grew up in South St. Paul. South St. Paul has had a 4,000-foot runway since I can remember and the jet traffic out there is very minimal. We're talking about a 3,500-foot runway, so it's just not a factor.
- No name or address given. I don't understand the importance of the airport, first of all, and what it does for our community. Why would we want to authorize the additional jet traffic and you say well, it will be occasional, but you know how occasional goes.
- Michael Wilhelmi, Resident of Stillwater. I'm here at the request of a couple of citizens with concerns. I had a really nice chat with Neil, thank you very much. He answered a lot of my questions, but I had a couple questions I was hoping you could address. Some of the comments we heard that MAC has a legislative mandate you must meet – you have no choice, you also are limited by a railroad on the north, Manning Ave. on the west and 30<sup>th</sup> St. on the south, and the frustrating thing is as you're trying to meet your mandate as we kind of heard tonight, it seems like the easiest of all those things is to kind of push on the neighbors. I'd like to explore a little better, like to ask you to explore, the runway impact zone – in my conversation with Neil, apparently, it was a 2012 rule that things had to be moved out or certain land uses could not be considered to be in the runway impact zone. Has there been any conversation, or are you aware of any waiver that's been done anywhere in the United States that would allow for something to happen? Honestly, I think some of the neighbors – what they're saying is that with 30<sup>th</sup> Street, those changes affect 1,700 people a day using that road, and I don't know how many more aircraft will be able to use this airport more safely as a result of the construction. *Evan Barrett asked for further clarification on what the specific question was – if it was regarding guidance regarding the new rules on the runway protection zone?* Michael admitted he hadn't been very clear and further clarified his question: I was curious if the MAC had explored if there are there any waivers in the United States at any other airports that are doing/have done something essentially what you're trying to do, that allow the airport to have a railroad in the RPZ? *Evan replied that the FAA's policy generally is that if there's an alternative that provides a clear runway protection zone that's feasible and practical, then that's the alternative you should pursue, all other things being equal. In this particular case, at Lake Elmo, there are alternatives that are feasible and practical, that do clear those runway protection zones. Again, the runway*

*protection zone is a big piece of the Purpose & Need and why the runway is moving. But, that's being weighed among other factors, and when the FAA looks at this, when they look at our RPZs, and they may say in this situation there might be something else that outweighs the need to clear that RPZ, they may consider it. But it really depends on a mix of variables. In this particular case, because there are multiple alternatives that would result in clear RPZs that meet the Purpose & Need and avoid other environmental impacts, when compared with the other alternatives, that's clearly going to be the alternative that the FAA is going to recommend, and at the end of the day, the Environmental Assessment is a federal FAA document, and so they do have a say in what the preferred alternative is. Michael then asked, regarding the feasibility, I understand that both the MAC and FAA will look at feasibility and say, well we can move this road, and we can still meet our mission – that's your job, that's what you have to do. But, the neighbors would say that's not feasible. I'm not only asking for a waiver for the railroad tracks, but I'm also curious to know if the MAC has studied moving the railroad tracks rather than moving the street. If those are the things that are bounding you, if that is something that was examined as well. Evan Barrett responded that he believed the LTCP had an alternative that looked at realigning Manning Ave., but it was pretty significant in terms of impact. Neil Ralston clarified that the LTCP showed the possible realignment of Manning Ave. that would have to be evaluated if the existing runway stayed in place, but it was not presented as an alternative. He further stated that the LTCP did not look at relocating the railroad tracks. Chad Leque then reiterated what Evan Barrett had stated earlier – that this is a federal document – both an environmental assessment to meet the requirements of the National Environmental Policy Act as well as a state EAW which meets the state's environmental policy. He said he had no doubt that the question of the 30<sup>th</sup> Street realignment is going to likely be a theme through the end of this dialogue, including the public hearing, which means there will be public comments on the topic that will have to be responded to, and ultimately, a decision document will have to be issued by the FAA. He further stated the position by the FAA to date has been clear, but that the questions should continue to be asked in the context of this project as it goes forward. He said it's not completely outside the bounds of possibility that, in certain circumstances, as things evolve, the FAA may look at things differently. He couldn't say that's going to be the case here, and said "it doesn't feel like it's going to be the case at this point, but I've seen it happen." He reiterated that's why these dialogues are important and that's why a public hearing is going to be important – for everybody to come and get their thoughts and concerns on the record. He said, at the end of the day, it's the FAA that has to issue the approval document on the environmental assessment. He further stated the ongoing dialogue the MAC has with the FAA about those kinds of community questions and concerns is designed into the planning process, and said those are the types of questions he'd expect to be asked and answered during a public comment period. Neil added that, even if the runway could be shifted a little bit further north, there would still be a bend in 30<sup>th</sup> Street. He noted it may be a little less of a bend, but there would still be a bend, and that leaving 30<sup>th</sup> Street in place with a clear runway protection zone would result in an extremely short runway.*

Todd Streeter then encouraged community members to head into the cafeteria to meet with the project team and continue the dialogue in the one-on-one engagement session.



## Meeting Minutes

The Q&A adjourned at approximately 7:40 p.m. The one-on-one engagement session ended at approximately 8:15 p.m.



Public Event

**Presentation**  
**at 6:30 in Auditorium.**  
**Questions & Answers**  
**to Follow.**

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**Open**  
**House in**  
**Cafeteria**

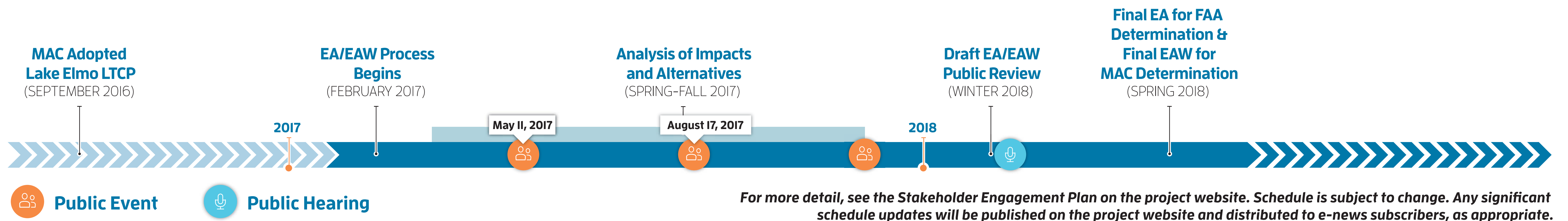
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Environmental  
Assessment  
Lake Elmo  
Airport



# Anticipated Environmental Assessment Timeline



Environmental Assessment  
Lake Elmo Airport





# Purpose & Need Goals

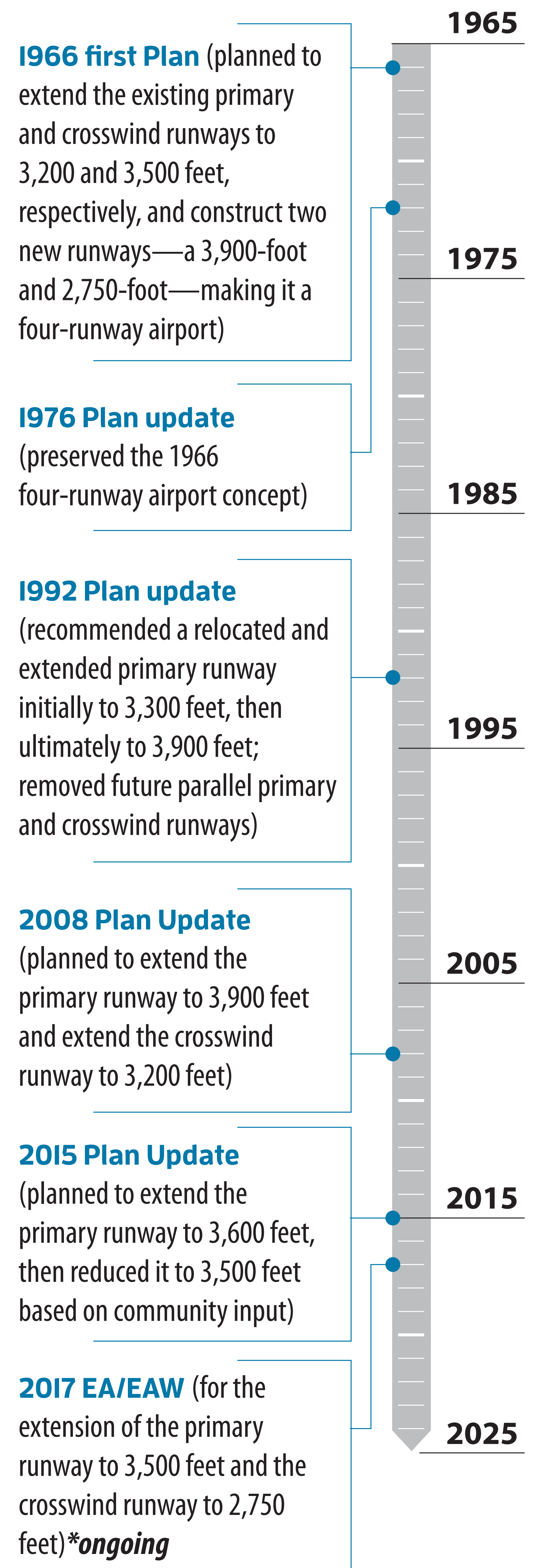
## The **PURPOSE** of the proposed improvements:

- 1 Address and attend to the airport's failing, end-of-life infrastructure;
- 2 Enhance safety for airport users and neighbors; and
- 3 Improve facilities for the types of aircraft using, and expected to use, the airport.

## The **NEED** for the proposed improvements:

- 1 Existing runway pavements are deteriorating and, for safety's sake, need to be replaced.
- 2 The primary runway has several incompatible land uses within its runway protection zones (RPZs), including a railroad and two public roads.
- 3 The existing runway lengths do not meet the needs of current aircraft operators and their aircraft.
- 4 The airport lacks the most current navigational technology for landing aircraft.

## Lake Elmo Airport Project History 1966 to 2017

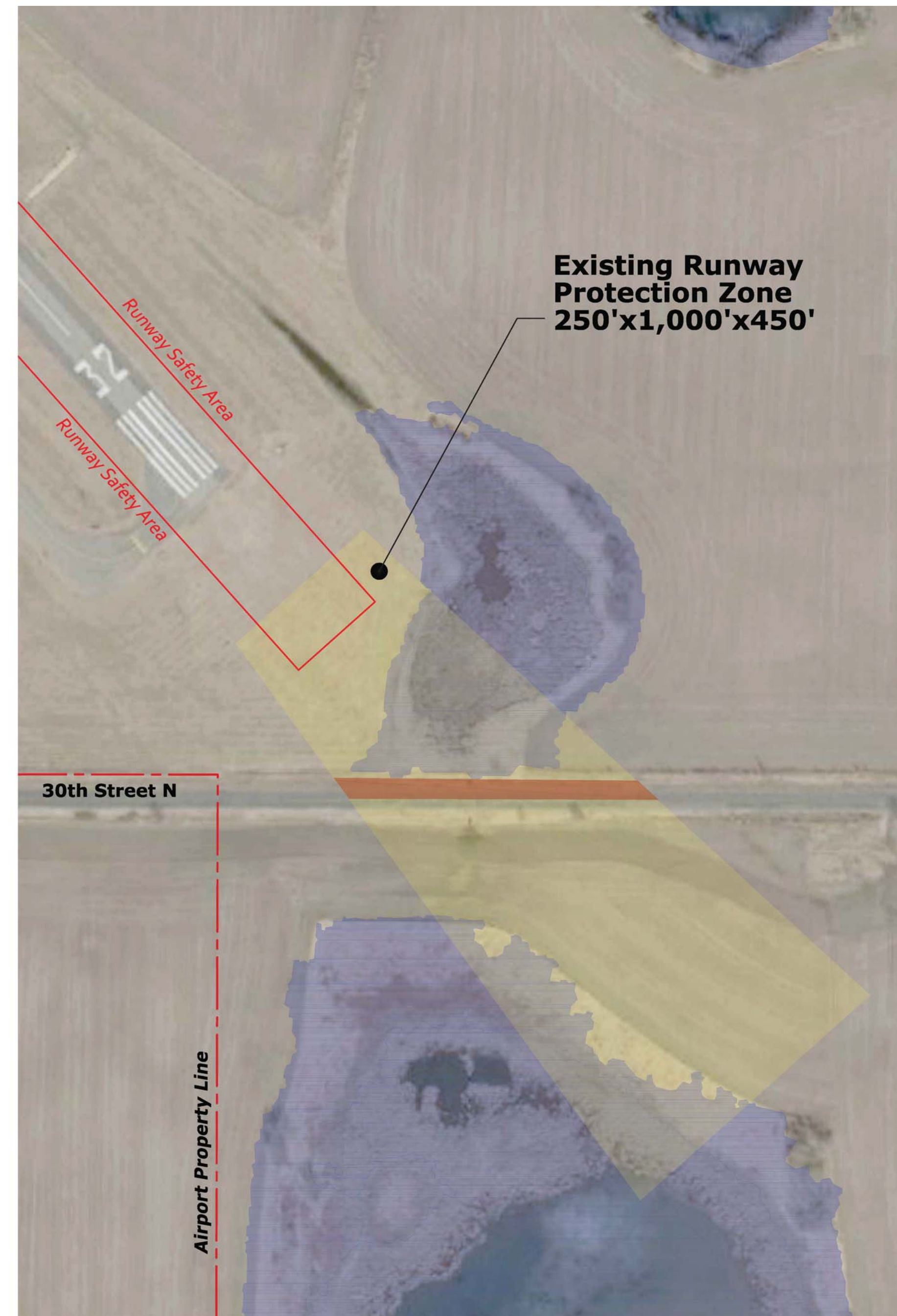
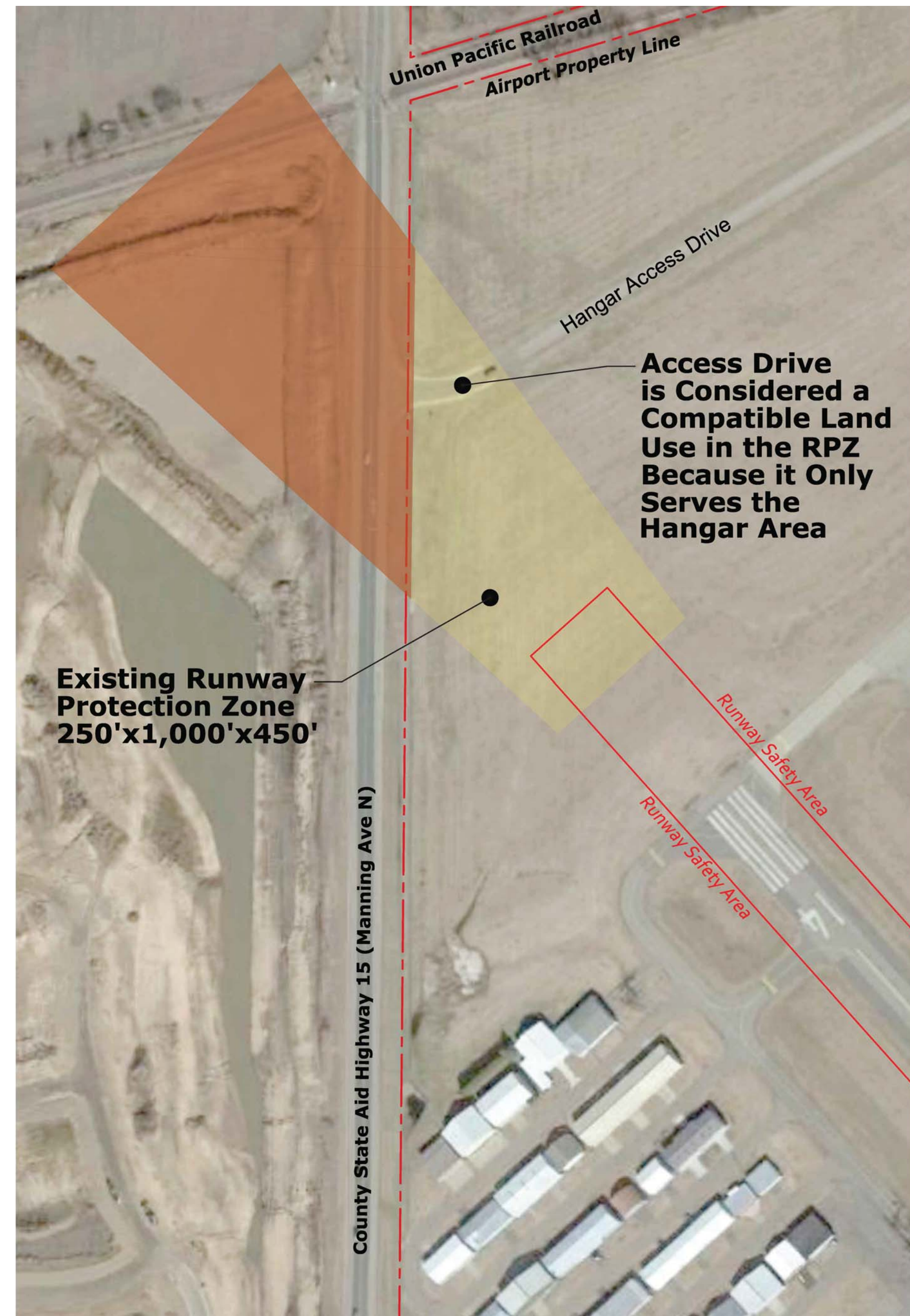


# Environmental Assessment Lake Elmo Airport


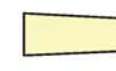







# Minimize Incompatible Land Uses in the Runway Protection Zones (RPZs)



**LEGEND**

-  Existing Property
-  Existing Runway Protection Zone
-  Incompatible Use Area
-  Approximate Wetland Areas



# Environmental Assessment Lake Elmo Airport







# Runway Length Needs

RUNWAY LENGTH IN FEET

EXISTING RUNWAY 14/32 LENGTH: 2,849'

PROPOSED RUNWAY 14/32 LENGTH: 3,500'

## Aircraft Type

CESSNA 340



BEECH BARON 58



PILATUS PC-12



BEECH KING AIR 200



SOCATA TBM 700



CITATION MUSTANG



CITATION EXCEL



CITATION X

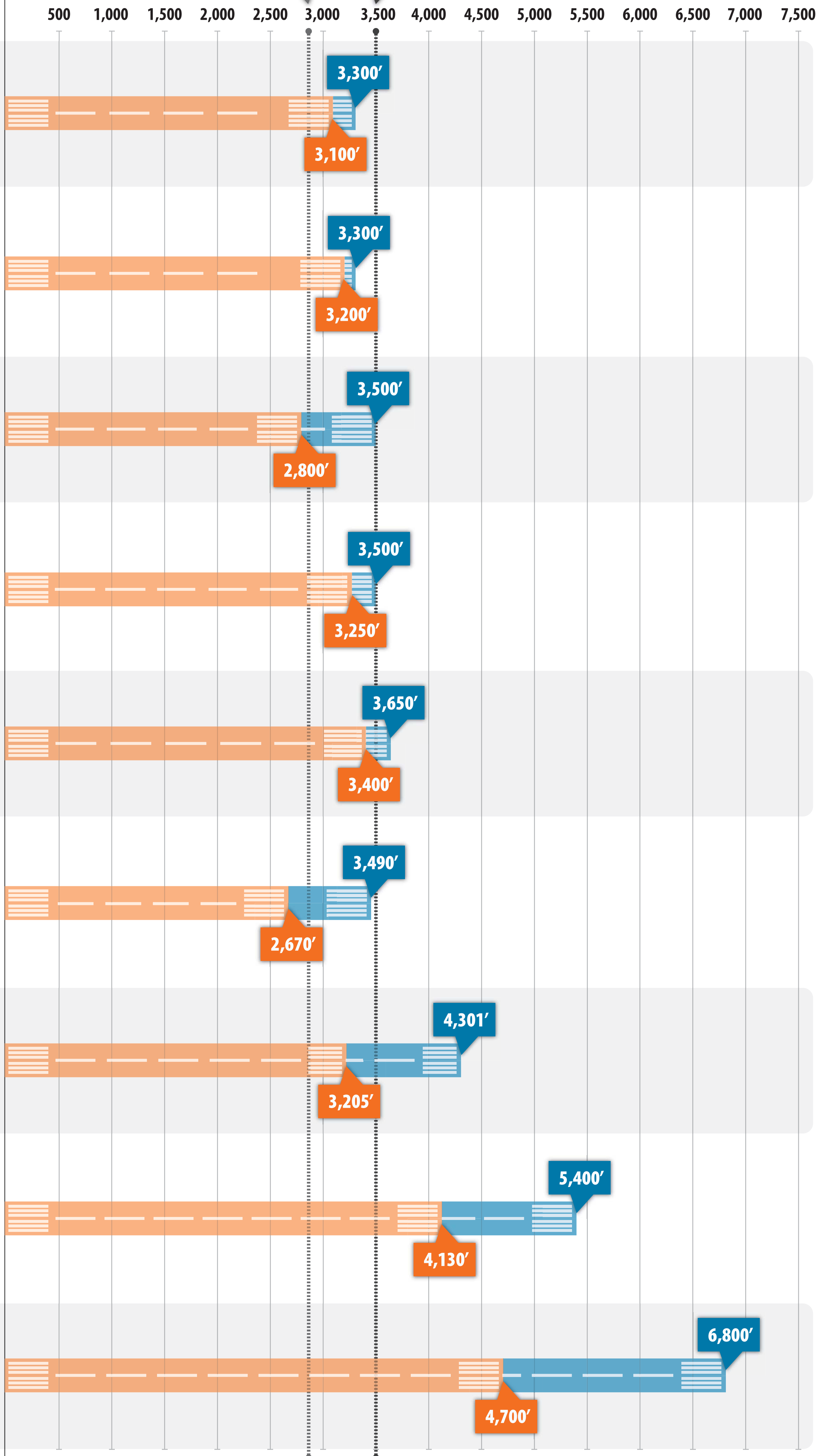


GULFSTREAM IV



DESIGN AIRCRAFT

JET AIRCRAFT



60% USEFUL LOAD

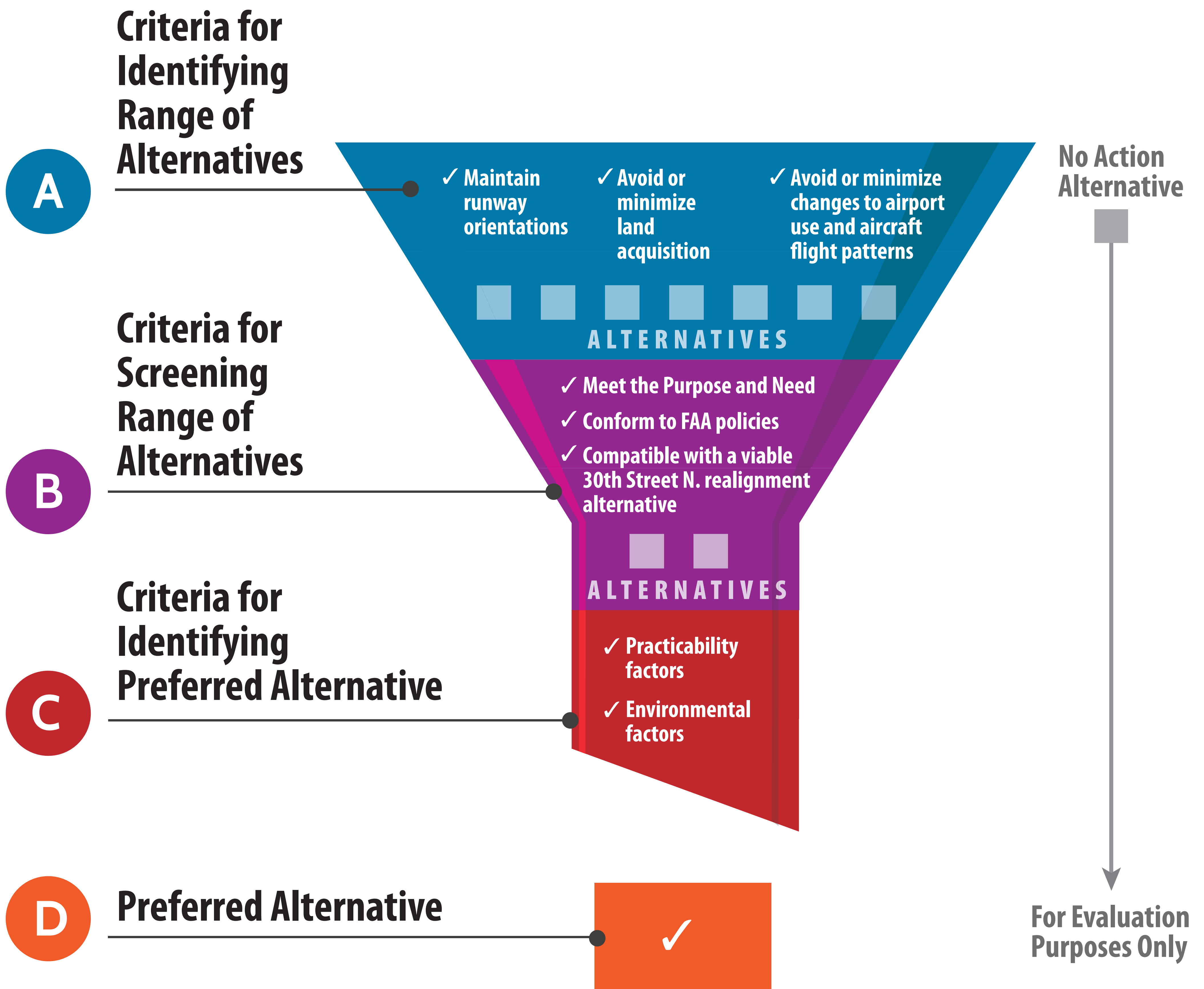
90% USEFUL LOAD

**NOTE:**  
 Propeller-driven aircraft runway lengths are based on accelerate-stop distances and jet-driven aircraft runway lengths are based on balanced field length takeoff distances, as identified in the respective aircraft performance manuals. Accelerate-stop distance is the length required to accelerate from a full stop to near lift off speed and then decelerate to a full stop. Balanced field length considers the accelerate-stop distance along with other safety factors as required for federal certification of these larger aircraft types. Lengths are calculated for a temperature of 82.3° Fahrenheit, a field elevation of 933 feet above mean sea level, and typical takeoff flap settings.

## Environmental Assessment Lake Elmo Airport



# Runway Alternatives Evaluation Process



## Environmental Assessment Lake Elmo Airport







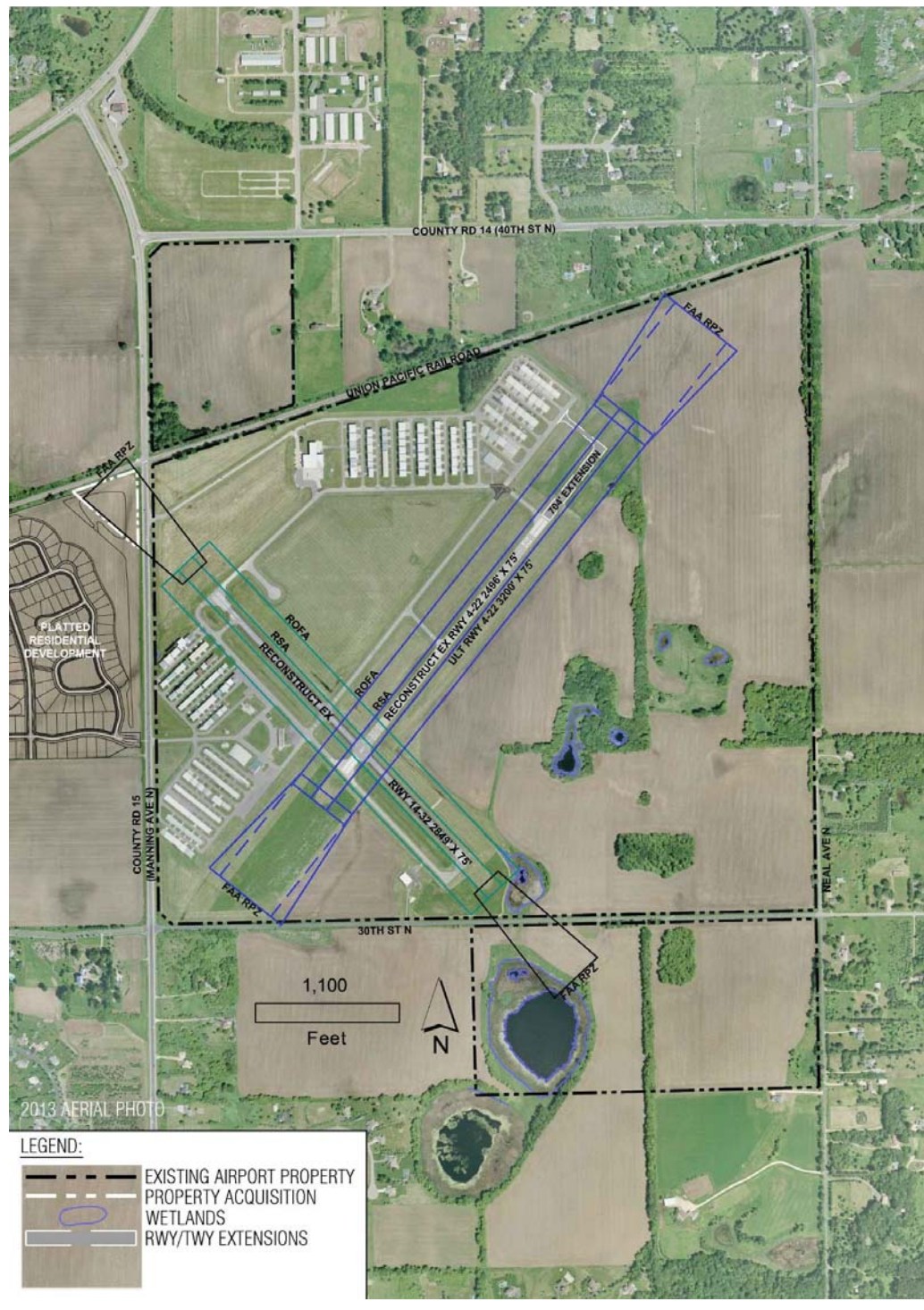
# Range of Alternatives

LTCP ALTERNATIVES

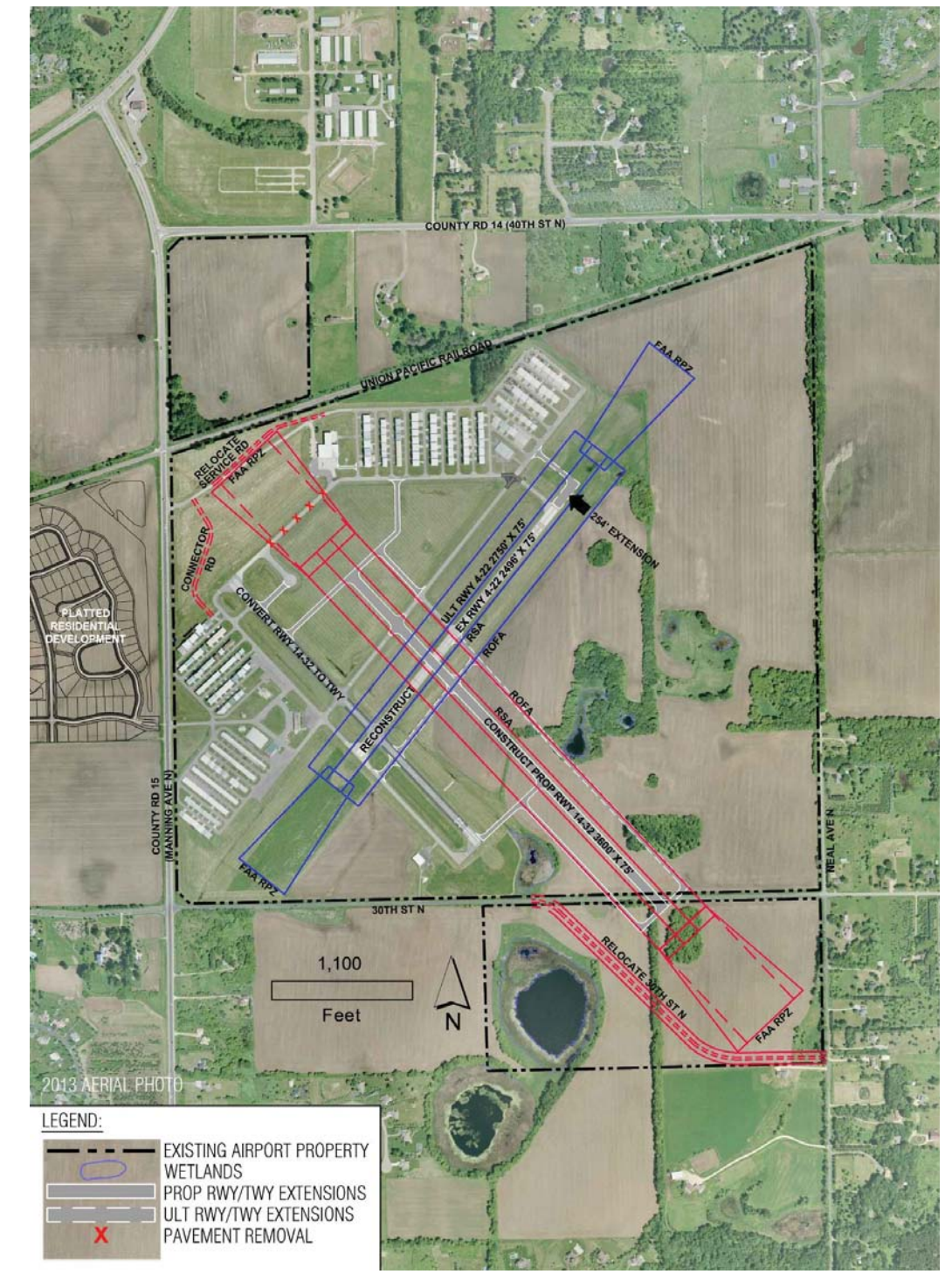
Primary Runway "No Action" Alternative



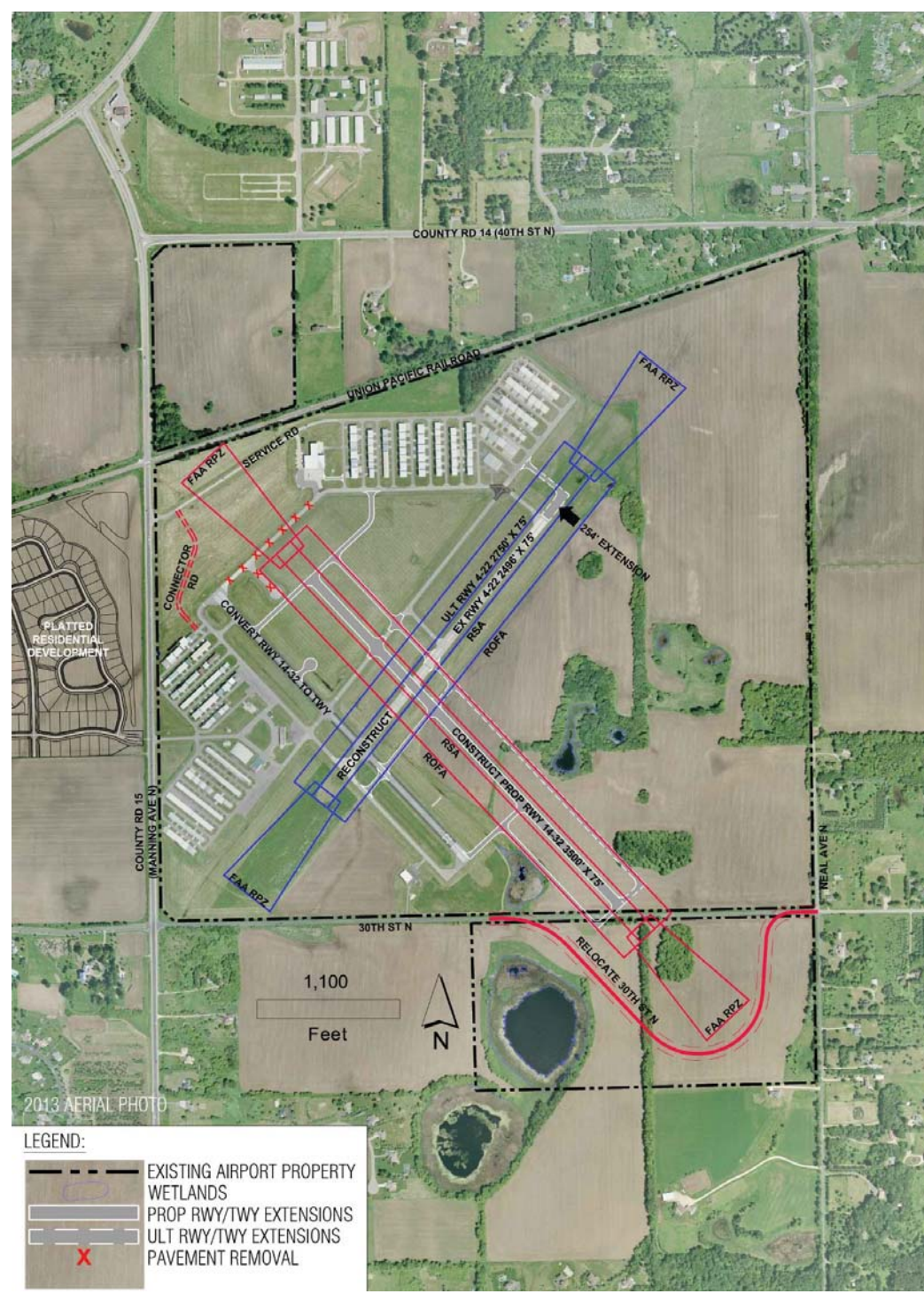
Primary Runway Alternative "A"



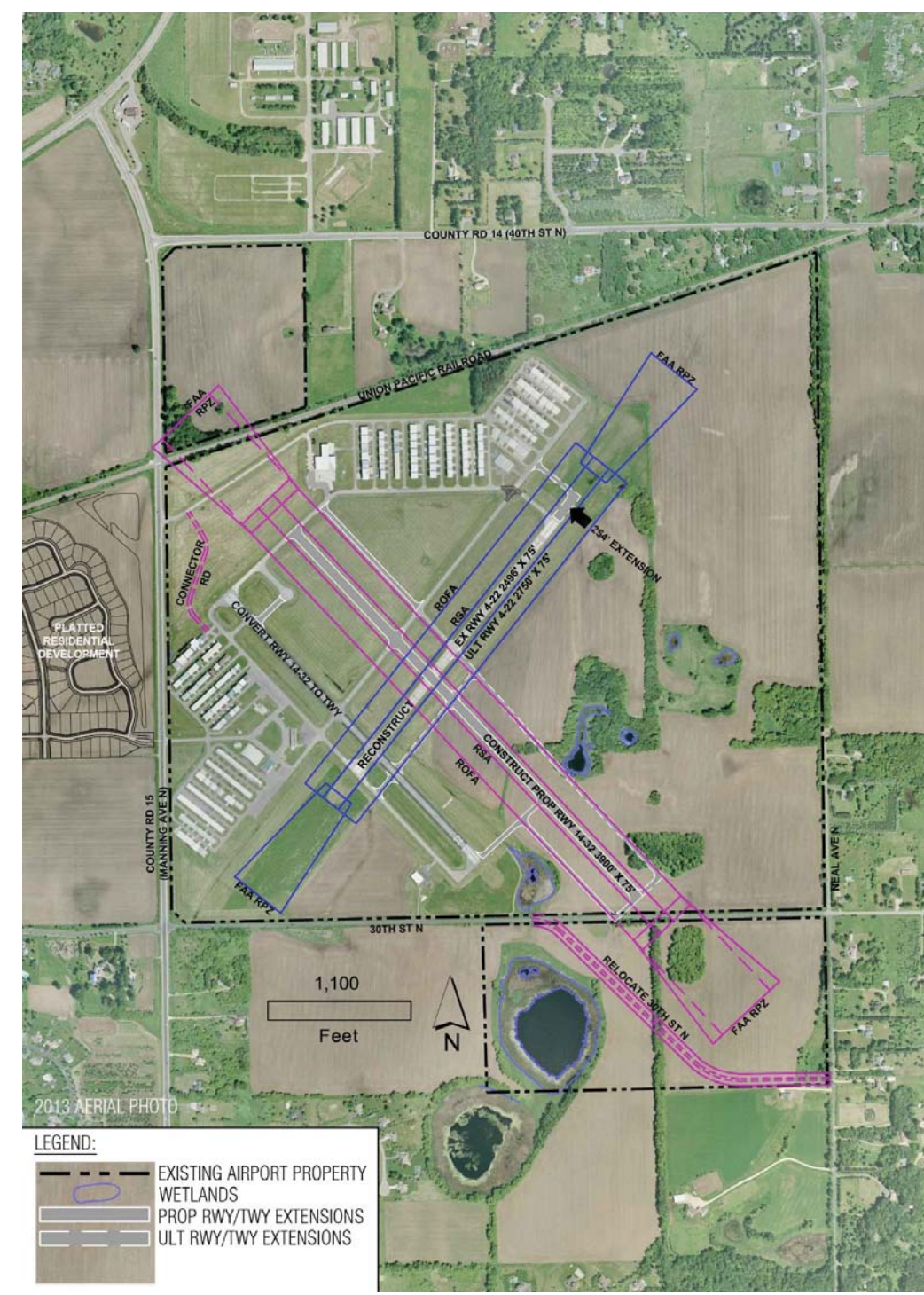
Primary Runway Alternative "B"



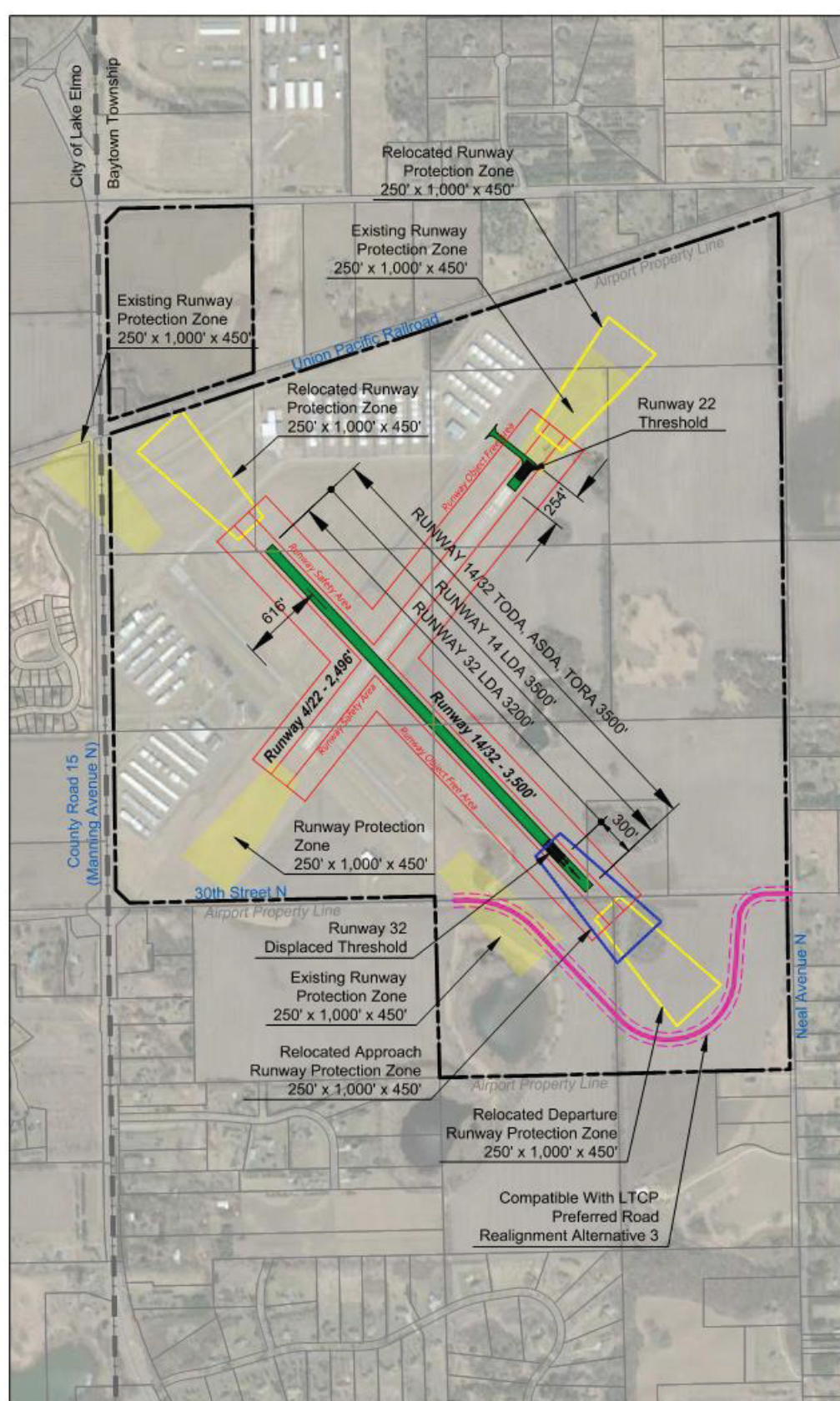
Primary Runway Alternative "B1"



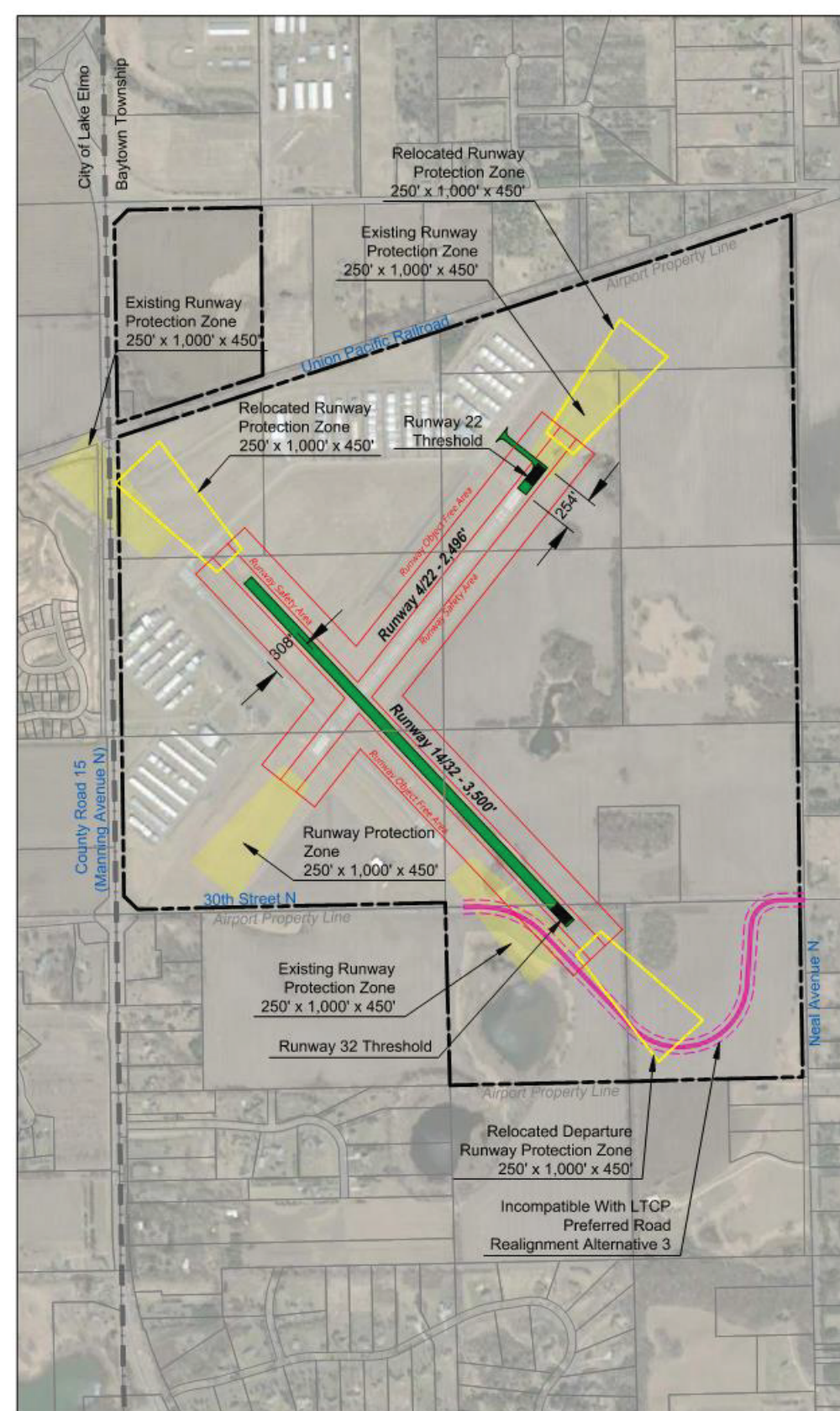
Primary Runway Alternative "C"



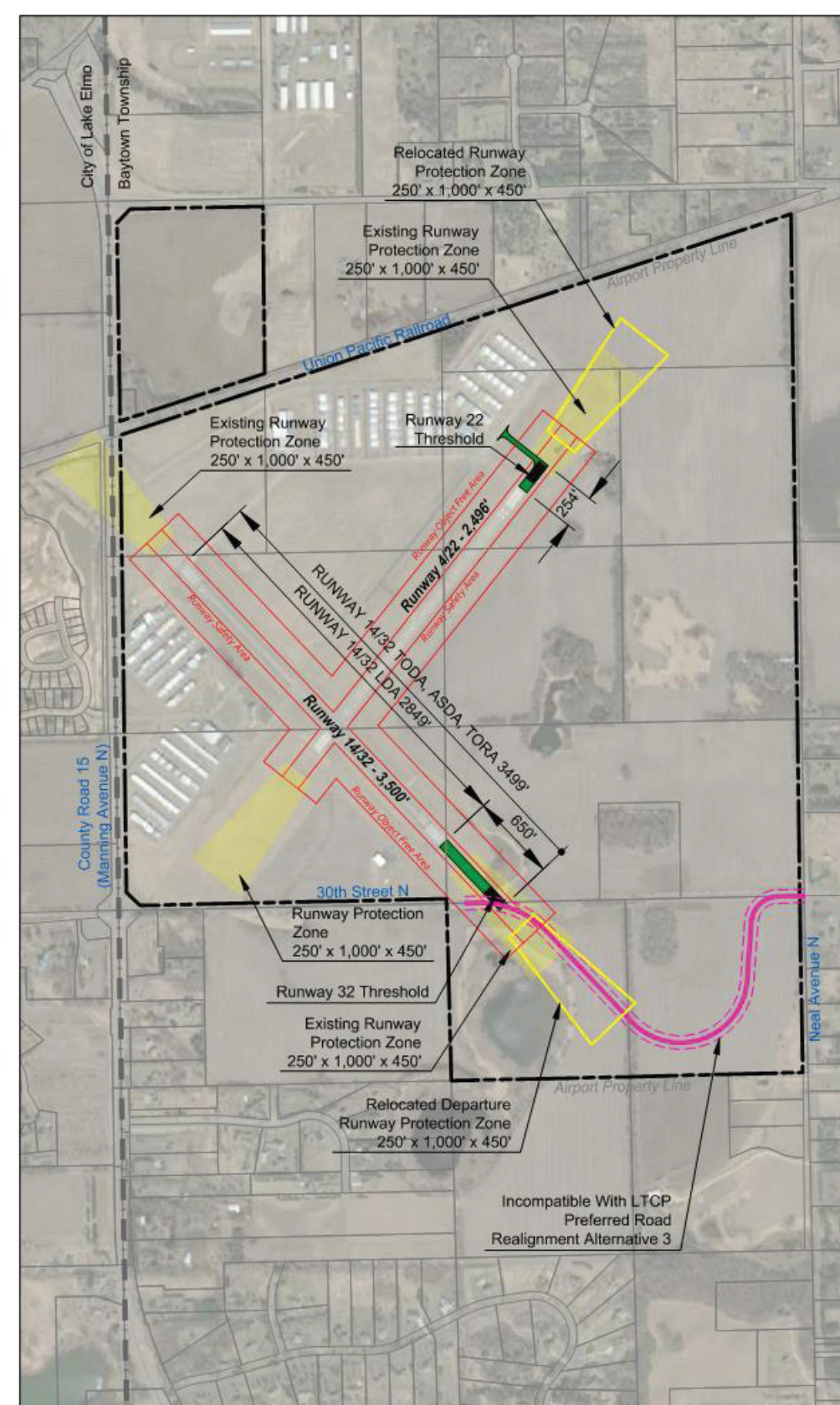
Primary Runway Alternative "B2"



Primary Runway Alternative "D"



Primary Runway Alternative "E"



SUPPLEMENTAL ALTERNATIVES

# Environmental Assessment Lake Elmo Airport





# Evaluating the Range of Alternatives

## TIER B: Criteria for Screening the Range of Alternatives

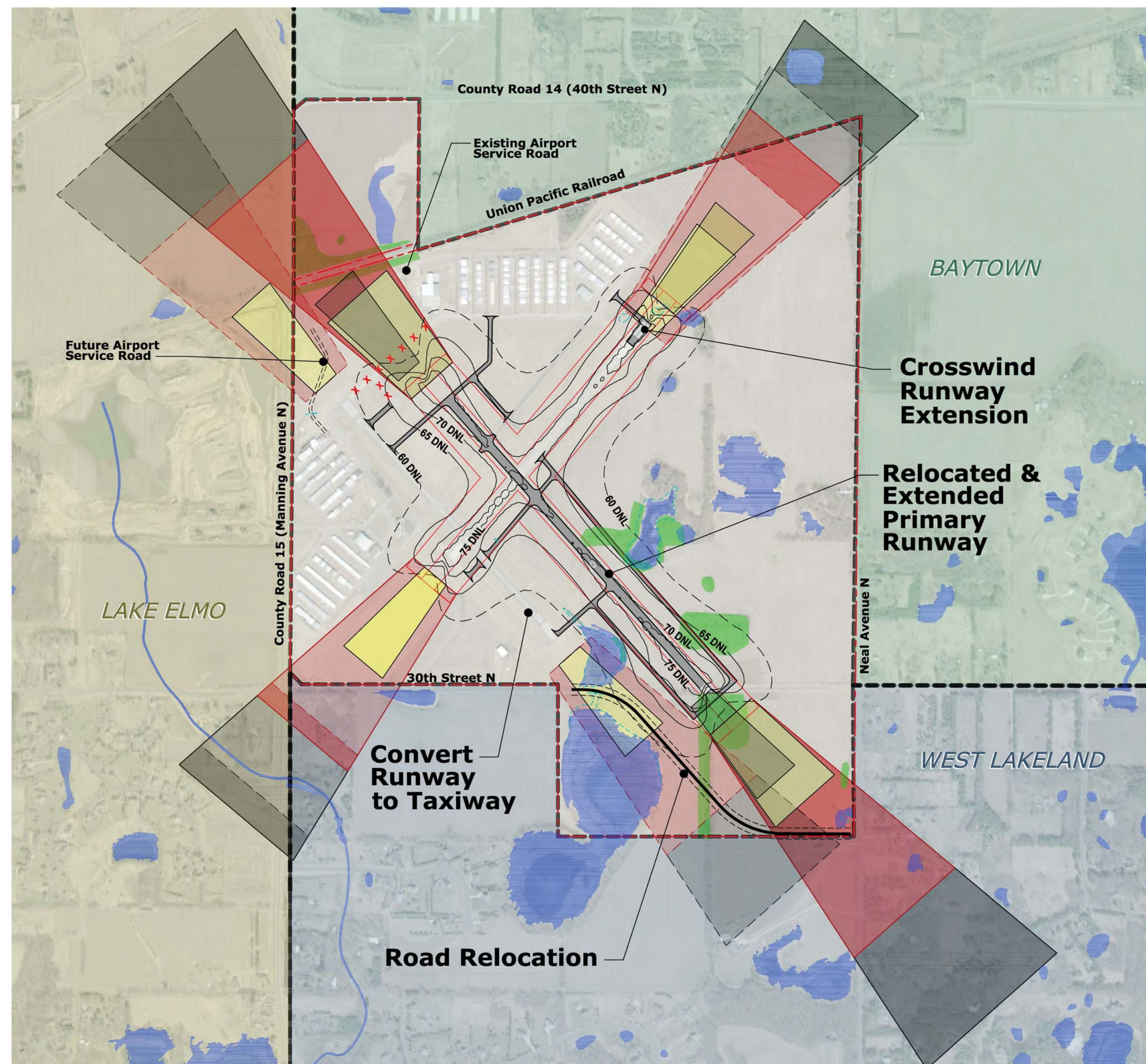
Alternative	Purpose & Need Objective 1 Improve the Runway Pavement Condition	Purpose & Need Objective 2 Minimize Incompatible Land Uses in RPZs	Purpose & Need Objective 3 Meet Runway Length Needs for Existing Users	Purpose & Need Objective 4 Upgrade the Instrument Approach Procedures	Conform to FAA Policy	Viable 30th Street Realignment Alternative
No-Action	YES	NO	NO	NO	NO	YES
Alternative A	YES	NO	NO	YES	NO	YES
Alternative B	YES	YES	YES	YES	YES	YES
Alternative B1	YES	YES	YES	YES	YES	YES
Alternative B2	YES	YES	YES	YES	NO	YES
Alternative C	YES	NO	YES	YES	NO	YES
Alternative D	YES	YES	YES	YES	NO	NO
Alternative E	YES	NO	YES	YES	NO	NO

Environmental Assessment  
Lake Elmo Airport

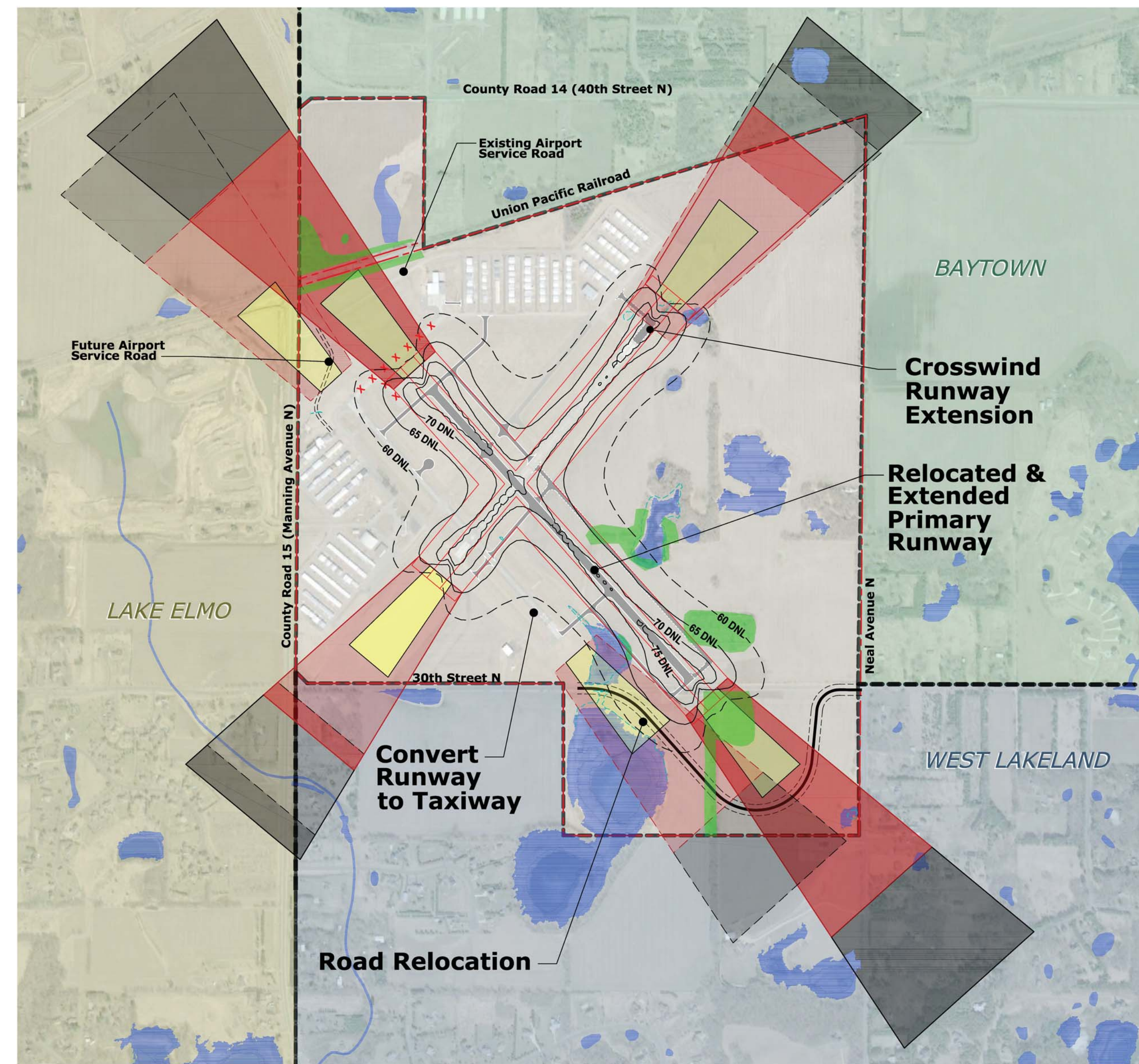




# Finalist Runway Alternatives "B" & "B1"



Finalist Runway Alternative "B"



Finalist Runway Alternative "B1"



- LEGEND**
- Existing Property
  - - - Municipal Boundary
  - Existing Runway Protection Zone
  - Proposed Runway Protection Zone
  - XXXXXX Pavement to be Removed
  - Future Pavement
  - Proposed Road Relocation
  - 2025 Noise Contours (estimated)
  - Model Safety Zone A (current runway)
  - Model Safety Zone B (current runway)
  - Model Safety Zone A (proposed runway)
  - Model Safety Zone B (proposed runway)
  - Approximate Tree Removal
  - Approximate Wetland Areas
  - Delineated Wetland Boundary

Note: 60 DNL shown for informational purposes only.



Environmental Assessment  
Lake Elmo Airport





# Evaluating the Finalist Alternatives

## TIER C: Criteria for Identifying the Preferred Alternative

Criterion		No Action Alternative	Alternative B Relocate 700' and Extend to 3,600'	Alternative B1 Relocate 616' and Extend to 3,500'
<b>Practicability Factors</b>	<b>Construction Cost</b>	\$5.4 Million	\$8.6 Million	\$8.3 Million
	<b>Logistical Factors</b>	Future Manning Avenue Widening will Trigger FAA RPZ review	30th Street N Realignment Options are Limited	None
<b>Environmental Factors</b>	<b>Wetland Fill Area (Approx.)</b>	NA	2.32 Acres	1.85 Acres
	<b>Wildlife Considerations: RW 32 Threshold to Nearest Wetland (Approx.)</b>	400 Feet	700 Feet	700 feet
	<b>Tree Clearing Area (Approx.)</b>	NA	22 Acres	20 Acres
	<b>Residential Parcels with Structures in Model Safety Zone A</b>	0	6	3
	<b>Residential Parcels with Structures in Model Safety Zone B</b>	2	9	10
	<b>Sensitive Land Uses (i.e., Residential) within 65 DNL (2015)</b>	None	None	None

Environmental Assessment  
Lake Elmo Airport



**Metropolitan Airports Commission – Lake Elmo Airport  
Environmental Review Public Event #3  
November 6, 2017 – 6:00-8:00 pm  
Oak-Land Middle School**

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**PUBLIC EVENT #3 – ENVIRONMENTAL EFFECTS**

**Meeting Objective:** Present the outcome of the detailed evaluation of environmental effects for the proposed airport development alternative that was presented on August 17, 2017.

**Agenda:**

*6:00 Welcome and Orientation*

Visit one-on-one with project team members about the environmental review process

*6:30 Environmental Effects Presentation*

Hear the outcome of the environmental effects for the proposed airport development

*7:00 Presentation Q&A*

30 minutes will be allotted for audience questions. See format below

*7:30 Community / MAC One-on-One Engagement Session*

Opportunity to discuss environmental concerns, ideas and opportunities with project team members

**Presentation Q&A Format**

After the presentation, audience members will have an opportunity to ask questions about the materials and information presented.

To allow as many people as possible to comment on the presentation during the Q&A period, we ask you to please adhere to a few guidelines:

1. State your name, residence, and if this is your first meeting before you ask your question;
2. Ask a question pertaining to the content presented this evening;
3. Keep your questions or comments to two minutes; and
4. Be respectful of one another and of each other's comments.

To be sure we meet the objective of the meeting, if you have questions about other topics, members of the project team are happy to answer those one-on-one immediately following the group Q&A session.





## **Why does the MAC hold public meetings?**

It is essential we receive constructive input, concerns and ideas to assist us in providing an airport that can best serve its purpose and users while reducing its effects on our neighbors. The MAC is committed to facilitating opportunities for public input and to addressing ideas and concerns, to the degree possible, throughout the environmental review process. Ultimately, our job is to provide an airport that meets the needs of our regulatory mandates and the aviation community, while reducing the burden to the local community.



**As a reminder, tonight’s public meeting is the third of four offered as part of this project’s environmental review process. A summary of the May 11 and August 17 meetings are below.**

### May 11, 2017      Introduction to the Environmental Assessment Process

Presentation provided overview of: MAC regulatory responsibilities per FAA and state legislative mandates, Lake Elmo Airport improvements purpose and needs; introduction to analyzing alternatives; the environmental analysis categories; and the stakeholder engagement plan.

### August 17, 2017      Purpose & Need and Alternatives

Presentation of: The justification (“Purpose and Need”) for the airport improvements; criteria used to evaluate the design alternatives; introduction to the various design alternatives; and conclusion on the preferred development alternative.

## **What has been done with input from the community?**

- The Frequently Asked Questions were updated on the project website to answer public questions and concerns
- The project team developed design alternatives to address primary 30<sup>th</sup> Street North concerns (safety and travel time)
- A deeper evaluation was conducted into runway length needs
- Additional personnel and resources have been dedicated to continue improving on meeting facilitation, informational materials, and public input opportunities
- Meetings were held between the project team and local experts on emergency response, individual residents, and community leaders to better understand and address concerns
- A pilot briefing will be held with based pilots to talk about noise abatement strategies

**Metropolitan Airports Commission – Lake Elmo Airport  
Environmental Review Public Event #3  
November 6, 2017 – 6:00-8:00 pm  
Oak-Land Middle School**

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**What role does the MAC play?**

The MAC is mandated by the state legislature to oversee the operation and ongoing maintenance of seven metro airports including the Minneapolis-St. Paul International Airport and six reliever airports: St. Paul Downtown, Anoka County-Blaine, Flying Cloud, Airlake, Crystal, and Lake Elmo.

The MAC's responsibilities, among many others, include overseeing the efficient, safe, and economical handling of air commerce throughout the metropolitan aviation system. Much of this work focuses on enhancing safety, complying with federal design standards, and improving operational capabilities for aircraft pilots, consistent with MAC's statutory mandate.

Like most large-scale, public-serving entities, MAC conducts long-term planning every few years. A Long Term Comprehensive Plan (LTCP) is an infrastructure planning tool that offers a look into the future and acts as a roadmap for future improvements, like runway repairs, structural needs, usage demands, and so on. Following a transparent and participatory planning process that determines which projects to undertake and when, the MAC takes on the role of seeing that environmental and permitting requirements are met and that surrounding communities are involved and heard throughout the project process.

If airport improvements are identified through the LTCP, a federal and/or state environmental review may be necessary to evaluate their environmental effects. Many state and federal rules govern the environmental process. On the federal side, the environmental review is conducted in accordance with the National Environmental Policy Act and needs to be approved by the Federal Aviation Administration. The state environmental review needs to conform to state statutes in accordance with the Minnesota Environmental Policy Act. Given its complexities and scope, environmental review processes often involve the public.

Completion of environmental reviews does not authorize construction. Before any construction can begin, the airport improvements must first be depicted on an FAA-approved Airport Layout Plan and compete for funding through federal and/or state grant programs.



## LAKE ELMO AIRPORT FEDERAL EA / STATE EAW

# Public Event #3 Meeting Minutes

Oak-Land Middle School  
November 6, 2017

### Agenda

- 6:00 – 6:30 P.M. – Open house with informational boards and an opportunity to visit with project team members to learn about the Lake Elmo EA/EAW activities.
- 6:30 – 7:00 P.M. – Presentation on environmental effects of the proposed airport development
- 7:00 – 7:30 P.M. – Presentation Q&A regarding the environmental effects information presented
- 7:30 – 8:00 P.M. – Community/MAC one-on-one engagement session to discuss environmental concerns, ideas and opportunities with project team members

### MAC/Mead & Hunt Attendees

Chad Leque  
Dana Nelson  
Neil Ralston  
Joe Harris  
Brad Juffer  
Amie Kolesar  
Gary Schmidt  
Michael Madigan  
Evan Barrett  
Colleen Bosold

### Representing

Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission, Lake Elmo Airport Manager  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
Metropolitan Airports Commission  
MAC Commissioner District F  
Mead & Hunt  
Mead & Hunt

*The attached report represents this writer's interpretation of items discussed during the meeting. Any corrections or additional information should be brought to our attention for clarification.*

Presentation slides and informational boards presented at this meeting, as well as the agenda, newsletter and a handout provided to the public, are available on the project website at [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Documents-and-Links.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Documents-and-Links.aspx).

### The purpose of the meeting was to:

- Present the environmental effects of proposed airfield improvements at Lake Elmo Airport.
- Provide an opportunity for community members to ask questions, discuss concerns and share ideas with project team members and for project team members to respond to inquiries from community members.

### **Items discussed were as follows:**

Todd Streeeter, moderator for the meeting, introduced himself and welcomed everyone. He stated this is the third public meeting of the Lake Elmo Airport environmental review process and introduced the agenda for the evening. He mentioned that the presentation and handout materials from tonight's meeting are all available on the Lake Elmo Airport project website. He went over the presentation Q&A format listed on the agenda and asked people to follow those guidelines during Q&A, and invited people with questions on material not covered during the presentation to seek out project team members during the one-on-one engagement session following the presentation Q&A. He then turned it over to Chad Leqve (MAC Director of Environmental Programs).

Chad welcomed and thanked everyone for coming, and stated he hopes the dialogue this evening is helpful in getting everyone up to speed on where the project team is at in the process of evaluating the environmental effects of the proposed development at Lake Elmo Airport. He presented a slide with a summary of the concerns raised by airport neighbors, which was developed in response to a suggestion made by a community member at the last Community Engagement Panel (CEP) meeting. He said it was a good idea because it helps the project team to maintain focus and sensitivity to the concerns of the community. He pointed out that the concerns shown on the presentation slide serve as the foundation for a lot of the resources available to the public, such as the Frequently Asked Questions on the project website and the project newsletters. He stated this is an example of the dialogue that's taking place, and wants the public to know their concerns are being heard and the project team is doing what it can to address those concerns while also meeting the Purpose and Need of the project. He also mentioned the environmental review process has a public review component built into it. There will be a public review period once the draft document has been published, along with an opportunity for the public to provide comments and share ideas and concerns for formal response and consideration in the planning process. He stated the project team will formally respond to those comments in the final document. He then turned it back over to Todd.

Todd then introduced Evan Barrett (Mead & Hunt project manager), who he said would be giving tonight's presentation on the environmental effects.

A copy of this presentation can be found at: [metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-Public-Event-3-11-06-2017.aspx](http://metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/21D-Public-Event-3-11-06-2017.aspx)

Evan introduced himself as an airport planner for Mead & Hunt, who is helping the MAC complete the environmental review for the Lake Elmo Airport improvements. He welcomed and thanked everyone for coming and mentioned that there's a handout of the presentation so the public can follow along. He said this meeting is a continuation of a process that has been underway since the beginning of the year. This is the third of four public events. The first was an introduction to the environmental process; the second covered the project's Purpose and Need and alternatives. Evan said tonight he would be covering the environmental effects of the preferred alternative. He said the team is in the process of evaluating the preferred alternative against a list of environmental impact categories defined by federal and state regulations. He then explained the environmental effects evaluation process. The FAA identifies significance thresholds and factors for the different National Environmental Policy Act (NEPA) categories to help determine if an effect (or impact) is considered significant. He explained that NEPA and the Minnesota Environmental Policy Act (MEPA) provide the umbrella under which we evaluate



these effects. There are several special purpose laws under the NEPA and MEPA umbrella, such as the Clean Air Act, the Endangered Species Act or the National Historic Preservation Act.

Evan then went over the NEPA categories that were evaluated in detail, how each was evaluated and the results of each area thus far:

- Biological Resources –
  - Approximately 20 acres of on-airport trees will likely need to be removed for the new pavement associated with the runways and taxiways as well as to clear airspace surfaces associated with the new runway.
  - Project team confirming with the FAA that there are no off-site trees that will need to be removed.
  - Project team identified two federally-listed species (northern long-eared bat, a threatened species, and rusty patched bumblebee, an endangered species); northern long-eared bat may be present in the tree removal areas, so impacts will be avoided and minimized using US Fish & Wildlife/USDOT-recommended measures; the rusty patched bumblebee has documented habitat within 2 ½ miles of the airport, however there is no suitable habitat for this bee in the project impact area.
  - Project team identified a state-listed threatened species (Blanding’s turtle) that may be present in both wetland and upland areas, so impacts will be avoided and minimized using MnDNR-recommended measures.
- Air Quality – Minimal impacts during construction, but neither operational nor construction emissions would exceed the FAA thresholds of significance.
- Cultural Resources – Project team did field surveys of historic age (50+ years) structures on and surrounding the airport and an archaeological survey (shovel testing). The FAA has made a determination of no effect to cultural resources and has sent that determination to the State Historic Preservation Office for concurrence. The FAA is also conducting nation-to-nation consultation with Native American Tribes as required for NEPA actions under federal law.
- Farmlands – Roughly half of the acreage of the airport is currently leased for agricultural use. Approximately 43 acres of on-airport farmland would be converted permanently to aeronautical use; project team is consulting with US Department of Agriculture to determine significance of effects.
- Hazardous Materials & Solid Waste – project team identified 17 known hazardous materials sites within one mile of the Airport (on and surrounding), but none will be affected by the project. Groundwater contamination plume would not be affected due to water table depth. Solid waste generated by the project will be disposed of according to applicable laws and regulations.
- Land Use –
  - Evan noted that a significant amount of his presentation at the last public event was on residential and ground transportation land use effects because it was a key evaluation criterion for comparing the different alternatives and selecting the preferred alternative. This was because the team made a concerted effort to make sure that the selected alternative balanced the land use effects and came up with a solution that minimizes these effects.
  - Residential – there will be minor changes to visual flight rules traffic pattern area (where aircraft circle when landing under visual flight rules conditions – this area extends about

- 1.2 miles off the end of each runway in all directions), but in terms of overall flight patterns over the area, there's not a lot of difference. Project team evaluated MnDOT's recommended State Model Safety Zones to evaluate the effects of the various alternatives. The MAC will convene a Joint Airport Zoning Board (JAZB) consistent with Minnesota Statutes prior to the project being implemented.
- Ground Transportation – design of realigned 30<sup>th</sup> Street N. can accommodate forecasted traffic volume and type; travel time will increase an average of 46 seconds in either direction.
  - Wildlife Attractants – tree removal and agricultural lease reductions are expected to reduce wildlife attractants on the airport.
  - Noise – The threshold for significance of noise is a 65-decibel day night average sound level (DNL) associated with annual usage of the airport. It does not measure the sound of specific aircraft events. It is an annual average based on number of operations, type of aircraft, time of day, runway ends used on a regular basis, etc. Project team modeled that based on historical data and forecasted operations. The 65 DNL contour is entirely contained on airport property for both the 2025 no-action and preferred alternative scenarios. Evan mentioned that the 65 DNL is the outermost solid line on the presentation graphic. The outermost dotted line is the 60 DNL contour, which is not considered a significant noise impact, but was evaluated and will be included in the environmental document for informational purposes.
  - Visual Effects – there will be lighting systems relocated and new lighting systems installed as part of the project. Evan showed and explained the three different types of lighting systems used on the airfield. Some of the lighting systems will move closer to the residential areas; however, lighting systems will only be fully operational (on and at full brightness) when activated by pilots. The project will relocate and extend primary runway lighting systems, and will add these systems to the crosswind runway, which is currently unlit. The project team is looking at ways to make sure the lights have as little effect on the neighbors as possible. Some options may include customized light settings, light baffles, and different options for fencing.
  - Water Resources
    - Wetlands – from a regulatory perspective, wetlands are the primary impact associated with the project. About 2 acres of wetlands (several portions of small wetlands located throughout the airport) will be filled and those will need to be replaced elsewhere at a ratio of 2:1. With about 2 acres of wetland impact, that means about 4 acres of replacement wetlands somewhere else.
    - Surface Water – net increase of 550,000 square feet of impervious surface associated with runways, taxiways and 30<sup>th</sup> Street N., meaning more stormwater coming off the pavements and not infiltrating right where it lands. There are a lot of federal, state and local performance standards and requirements the MAC will be required to meet in the design of the stormwater runoff – these will be identified in the environmental document. It is the project team's opinion all these standards and requirements can be met with structural controls and best management practices.
  - Cumulative Impacts – This category provides a context for the proposed action in terms of past, present and reasonably foreseeable future actions within a reasonably close geographic area to the project. The environmental document will characterize the things that have happened to date in the vicinity of the airport, things that are happening on and around the airport right now, and reasonably foreseeable development on and around the airport. The primary ones the

## Meeting Minutes

project team has identified are significant development around the airport over the past 50 years – 1,720 parcels developed since 1964 within two miles of project, continued urban development expected especially west of the airport, and Manning Ave. expansion from two to four lanes. All of these things have a cumulative effect over time that needs to be represented and disclosed in the environmental document.

Evan then directed the audience to the table in the back of the presentation handout summarizing the environmental effects. The items in green are the categories for which the project team has definitively identified the effects/impacts AND any required permitting, mitigation and/or associated actions. The project team is still evaluating the categories in white – he said 75-80 percent of the analysis on those has already been completed but the project team is coordinating with various government agencies and determining any voluntary mitigation that the MAC may want to undertake. For these categories, there may be additional information included in the final environmental document that is not represented here, but, in general, this table gives a good overview of the team's findings of the effects that will be in the document.

Evan then covered next steps: He mentioned the project team has met with the Community Engagement Panel (CEP) four times over the past year and will be meeting next with the CEP on January 16<sup>th</sup>. At that meeting, the project team will give the CEP a final overview of what will be in the environmental document. The team will then publish that document shortly thereafter for public review and comment. Approximately a month after the publication of the draft for review, the project team will hold a public hearing. Anyone from the interested public can submit written comments at any time during the comment period or submit oral statements for the record at the public hearing. Those statements will be included in the final environmental document and addressed/responded to. At the end of the process, a final federal Environmental Assessment (EA)/state Environmental Assessment Worksheet (EAW) will be issued. The FAA makes the finding on the EA and the MAC on the EAW.

Evan closed by saying this is the process we've been going through for the past year and there are a couple more months to go. He thanked everyone for their participation in the process as well as for attending tonight's meeting and said he looked forward to questions during the Q&A session.

Todd then reiterated that this public process is still ongoing with further opportunities for public review and comment during the review period and public hearing. He opened the Q&A session and informed the audience that a staff member would be walking around with a microphone for people to use when asking their questions so all can hear. He requested that those asking questions state their name and city/township and keep questions or comments to two minutes each so that the panel could get through everyone's questions.

**The presentation Question & Answer session that followed is described below.** *(Responses are indicated in italics.)*

- Dave Schultz, West Lakeland Township Supervisor & CEP member. I have some concerns here. I'll rattle them all off and you can address them how you'd like. You spoke about tree removal and bats and that they wouldn't be affected. I'm not sure that's exactly true. Yes, you're going to take the trees out while the bats are in hibernation in caves, but when they come back the trees are gone and that will technically affect them. At a previous meeting, you had made a reference about the number of aircraft at the 60% capacity or load level and I'd asked how many

of those planes are based out here today. Is there one plane or are there six or 16? I'm still waiting to find out how many aircraft here today are at 60% capacity before they can take off, where they can't be at 95%. Where in your process are you going to visit the Valley Branch Watershed? I know you have it in your plan that you're going to do it; I attended a meeting last week at Valley Branch and they were not aware of what you're proposing. You may have talked to the Barr Engineering engineer representing Valley Branch but the Valley Branch managers were not aware of any of this. One resident made a comment to me that these are wants—these aren't needs. If they want something, maybe they shouldn't be based here. You spoke about soil types. Have you done any borings? Do you know what soils are below the first couple feet of ground? Might want to look at that. There was a comment about RPZs here in the past and I got curious and I went and looked at MSP and from the map I was able to determine it looks like 494 goes through the RPZ for 17/35. Is that true? How do you mitigate water at a 2:1 ratio in some other part of the township/county/state? You may mitigate it, but that doesn't handle the water. I also have a concern if you're supposed to take and, if I'm correct, keep 1.1 inches of rainfall on MAC property during a rain event, how is this addressed in the winter months when the ground is frozen? Last year at Christmastime we had a 1" rainfall and so I was curious how this would be addressed? *Evan Barrett started with the tree removal and bats question, with Dave's point being that the trees would not be there when the bats returned. He noted that Dave had a point there. Evan then said he should have mentioned this at the beginning of his remarks, is that these significance levels and factors – in some cases there's a significance threshold the FAA has identified for certain categories. For example: noise. It's a very hard line, quantitative threshold: 65 DNL sound level. In the case of the northern long-eared bat and tree removal, while there are still technical factors to consider, there isn't a hard line in terms of how they define significance. The FAA has to make a determination—for any species that may be affected—on the likelihood of any significant effect. The FAA coordinates with the US Fish & Wildlife Service (USFWS) to make sure that the USFWS agrees with the FAA that there is no significant effect. The FAA has submitted that determination to USFWS and USFWS' concurrence will be in the final environmental document. Evan then said he'd focus on Dave's environmental-related questions and suggested they follow-up on the others afterward. Evan said he was disappointed to hear Valley Branch Watershed District (VBWD) wasn't aware of the proposed improvements. He said the project team has been working closely with VBWD's engineer and also with Washington County Soil & Water and other similar agencies like Minnesota Board of Water & Soil Resources. The team had soil scientists from all three of these entities out in the field with the project team a few weeks ago to take a look at the wetlands the project team has delineated. He expects that at the November 9<sup>th</sup> meeting the Board will concur with the wetland boundaries the team has identified. Evan said if there are certain people from the VBWD that aren't aware of the project, he'd be happy to speak with them and bring them up to speed, but the team has been working closely with VBWD. Regarding soil types, Evan said the team has not done any soil borings as part of this project but has looked at available soil data the USDA makes available, as the project team had to make a determination on whether or not areas that would be affected by the proposed project constitute prime farmland and that's dependent on the type of soil out there. He said Mead & Hunt's engineers have looked at the 30<sup>th</sup> Street realignment, which is the area he believes has been brought up as an area of concern in terms of soil types, and they believe the geotechnical conditions are such that there's not going to be any issues as far as the soils. Regarding the question on replacement of the wetlands at a*



2:1 ratio, Evan said that in the case of airports, wetlands are considered wildlife attractants. So while ideally you would replace a wetland right next to the wetland you're impacting, from an airport perspective, that's not the best option, because it's not as safe. He noted it is common for projects like this – not only for airport projects but also highway projects and other projects – to purchase credits from wetland banks that restore or create new wetlands elsewhere to replace the function of that wetland. He said it does not alter the fact that if you're taking away that wetland, you're taking away potentially an area that's holding water during high-storm events. You mentioned the 1.1" requirement that the VBWD has and the team is considering that very closely in the design of this project. If the project can't meet that standard, the project won't be permitted. So, the MAC must meet that standard – there's really no way around it.

- Norm Jones, resident of West Lakeland Township (mentioned this was his first meeting). Six months ago, I started learning to fly, and was shocked to do the math and figure out that if I wanted to put my whole family in the plane—which was the plan—on a hot summer day, and expect to live, that wouldn't a good idea on our short runway. So thank you for doing this. I've had a discussion with a neighbor or two who wasn't a pilot and he was wondering, "why do we need to do this," but I explained that if your road engineer tells you that you need a stoplight instead of a stop sign because your road now needs to be safer, you don't argue with the road engineer: it's safer. My question is will all the runway length be usable or will there be a displaced threshold, backing off some? If there is a displaced threshold, is it too late to add more length to compensate for that? *Neil Ralston, MAC Airport Planner, responded that the full 3,500 feet on replacement Runway 14/32 will be usable pavement – no displaced threshold.*
- Mike Wilhelmi, Resident of Stillwater. With respect to the ponding that was built for the Easton development for their runoff, that development is somewhat new and I don't know how long the plans were in place or if they ran them past you before they went forward, but is there any concern about birds being at the ponds and then flying through your RPZ? *Evan Barrett responded that wildlife attractants are hazardous at airports and there are certain measures airports can take to discourage wildlife, so the team will have some recommendations on measures that can be taken not only in the new development but also in areas on the airport that may attract waterfowl and other types of wildlife. The FAA has a standard that within 48 hours of a rainfall or significant precipitation event, that any storm water detention facilities be designed to drain in that timeframe. Neil Ralston then added that, regarding Easton Village and the corresponding Village Park Preserve development that will be going in south of Easton Village, the MAC did review those plans and had significant comments on the storm water retention. The MAC worked with USDA Department of Wildlife to give the designers some recommendations on how to minimize the attractiveness of those ponds to waterfowl – largely making them narrow and deep, and they also asked that the developer not plant lawns along the back side of the pond but have it be native grasses that are less attractive to the waterfowl. He then said, yes, in an ideal world we wouldn't have retention ponds across the street from the airport but that being said, we did work with them to minimize the attractiveness of those ponds—by design—to waterfowl. He then pointed out that the runway being proposed moves further away from those ponds than the existing runway is today.*
- Molly Olson, resident of West Lakeland Township. I'm a pretty new resident; not happy about this. Can you refresh my memory about the mission statement and goal you have created for the CEP? *Dana Nelson thanked Molly for her question and responded that, as part of this process, the MAC wanted to make a concerted effort to create a plan that was intended to reach*

out to a wide variety of stakeholders, so the team put together the Stakeholder Engagement Plan. Part of that was convening a Community Engagement Panel (CEP). The Stakeholder Engagement Plan (SEP) set forth the CEP membership and who the team reached out to incorporate into that panel. It included community leaders who were part of the long-term comprehensive planning process, Washington County, airport users who were part of the planning process as well, a couple MAC staff members, Stillwater Chamber of Commerce, and the MAC Commissioner who represents that area. She said there is a lot of description on what the CEP was intended to do in that Stakeholder Engagement Plan, which is available on the project website. Dana said she'd be happy to provide a copy to anyone interested in it. She said there isn't a specific objective of the CEP laid out in the Stakeholder Engagement Plan and noted this is the first time the MAC has convened a CEP and is learning throughout the process. She stated they would include an objective statement for future CEPs. She also offered that if the CEP would like to discuss this during their next meeting, it could be added to the discussion agenda. Molly said, I'm asking the question because it seems to me it's being portrayed as "oh look at us, we're engaging the public and we are interested in what they have to say," but the few I've attended seem to be talking at the people, and not really trying to arrive at clear solutions that will achieve win-win solutions for the hobbyists at the airport, the MAC and their desire to spend money vs. the impact of the community. The second question I have is on this big spreadsheet here which, as I understood it, this is an outline of what will be provided to the federal government to get your final approvals in your report – is that right? If I understood that right—that this is everything that's going to be in your report—I'm wondering where in here has anything to do with how the people feel about this and the impact that the people that live around it feel? It doesn't look like that's included in here. Evan Barrett responded that the table is a summary table of the environmental analysis categories that the project team is required to look at under the National Environmental Policy Act and what their findings are going to be. He said that's going to be supported by a lot of detailed information—and he acknowledged he rushed to get through a lot of information in a short period of time here this evening—but said the team's intent in providing this information in this forum is to provide that overview so that when members of the public go to look at the draft document that is published early next year, that it's not going to be as difficult to process or find what you're looking for. He said that part of the intent of this whole stakeholder engagement process is to provide that baseline of understanding of what the project team is doing, but also to listen and make sure they understand what the concerns of the community are. He stated there's no requirement under the National Environmental Policy Act to do this stakeholder outreach process; this is something the MAC chose to do because they believed it was important based on what they'd found during their previous planning efforts. It was an important goal for the MAC to implement a process like this that allowed for these sorts of questions, comments and dialogue. Chad Leque then added, on the topic of community concerns and what the team has heard throughout the dialogue, he'd started the meeting with the list of topics, and acknowledged that Molly was the one who brought that idea up at the last CEP meeting. He said, "You've been a passionate advocate for making sure we have a process that really listens and isn't talking at people, and you've been consistent in your advocacy for that and attending meetings and maintaining a keen eye toward that concept. We are trying. As Dana said, we're doing some things that are new for MAC staff, and admittedly, there's some learning that's occurring along the way and I would characterize your thoughts and ideas at the last meeting as a learning for us on some of the things that would

*be effective and helpful in communicating and engaging with the public.” He thanked her for that. He also said the process is designed to give answers to the questions that people have, and the team is trying to do that in a few different ways – FAQs on the website, for example. As he mentioned at the beginning of the presentation tonight, there is a formal component of this environmental review process that is focused on the public’s comments. Any member of the public can submit a written comment or testify at the public hearing for the document. That testimony and those written comments will be included in the record that will be before the respective organizations that need to make a determination on the final environmental documents. He referenced what Evan Barrett had stated earlier, that those organizations are the FAA on the federal side (under NEPA) and the Metropolitan Airports Commission on the state side (under MEPA). He said the project team is making an effort to do more than the bare minimum, which per federal NEPA requirements is just doing the public comment period. He said the team is trying to take and respond to comments as best it can throughout the process, and, when possible, try to address some of those issues and concerns as part of the planning process. He reiterated, “We’re not done yet in terms of formal opportunities for comments and responses to questions. That’s still an important part of the planning process that lies before us before any determination is made on these documents.”*

- Mike Wilhelmi, Resident of Stillwater. I have a question about the grant process you’re following and the program that you’re going to use to get the funding to execute the project. I know there are some fairly strong constraints about how the program must be designed in order to draw down that FAA funding, and I think we’d talked about this at a previous meeting, about asking for a waiver of where the RPZs would be – if it could be that the MAC and the community got together and said, with the space that we have, it’s going to be hard for us to have the length we think is necessary for the flying public, would it be possible for you to ask the FAA for a waiver to allow the RPZ to be over the railroad tracks or over 30<sup>th</sup> Street? *Chad Leque responded that the team has engaged the FAA on that topic because it’s the catalyst for the whole discussion on the rerouting of 30<sup>th</sup> Street. As part of the CEP efforts, Chad reached out to the FAA again to ask if there are any options that would lessen the need for some of the rerouting being considered as part of the project. The position received from the FAA was “no.” He said they stood firm on that. He reported that some of this dialogue took place back when the team was evaluating other options for the design of the 30<sup>th</sup> Street reroute, focusing at that time primarily on travel time because there was a concern on safety services and increased travel time with the realignment of 30<sup>th</sup>. He noted the team also engaged the FAA on that topic following the last public meeting when this question was brought up, just to reconfirm their position on this issue. Mike said he just wanted to confirm they’d asked more than once. Chad confirmed that they had.*

With no further questions, Todd Streeter then closed the Q&A and encouraged community members to meet with the project team and continue the dialogue in the one-on-one engagement session.

The Q&A adjourned at approximately 7:25 p.m. The one-on-one engagement session ended at approximately 8:00 p.m.

# Environmental Effects Evaluation Process

**1** Is the environmental category relevant to the proposed development?

▼ YES

▼ NO

■ No Further Analysis Required

Environmental Category Relevant

- Collect Data
- Evaluate Effects
- Determine Required Permitting/Mitigation

**2** Are effects "significant" based on FAA-established thresholds and factors?

▼ YES

▼ NO

■ No Further Analysis Required

Significant Effects Considering FAA Evaluation

- Federal Aviation Administration (FAA) Conducts Environmental Impact Statement (EIS)

Environmental Assessment  
Lake Elmo Airport

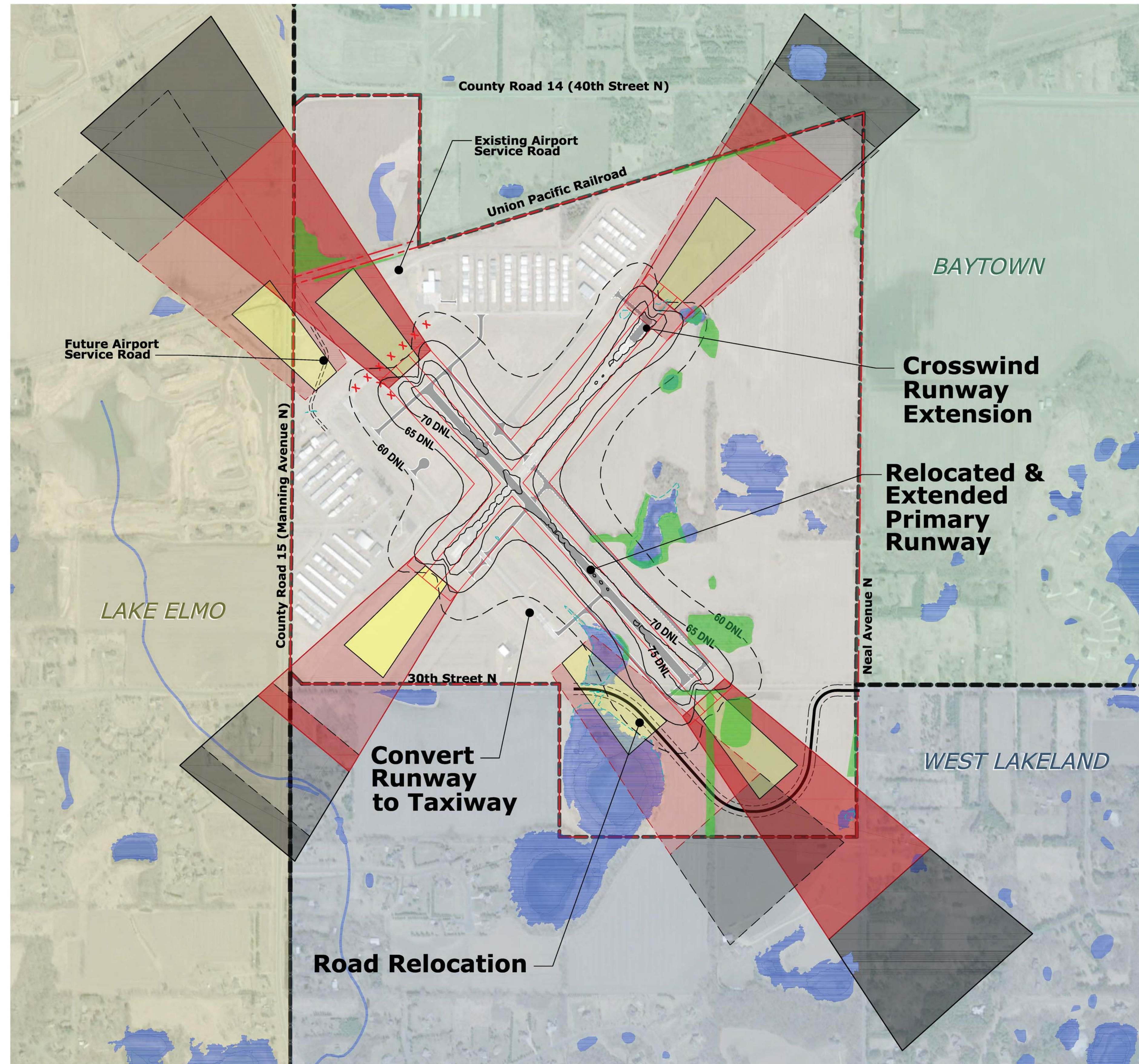




# Proposed Development "Preferred Alternative"

- LEGEND**
- Existing Property
  - Municipal Boundary
  - Existing Runway Protection Zone
  - Proposed Runway Protection Zone
  - XXXXXX Pavement to be Removed
  - Future Pavement
  - Proposed Road Relocation
  - 2025 Noise Contours (estimated)
  - Model Safety Zone A (current runway)
  - Model Safety Zone B (current runway)
  - Model Safety Zone A (proposed runway)
  - Model Safety Zone B (proposed runway)
  - Approximate Tree Removal
  - Approximate Wetland Areas
  - Delineated Wetland Boundary

Note: 60 DNL shown for informational purposes only.





## Environmental Assessment Lake Elmo Airport





# Preliminary Summary of Environmental Effects

Environmental Analysis Category	Effects: <i>Baseline Alternative (No Expansion Alternative)</i>	Effects: <i>Preferred Alternative</i>	Required Permitting, Mitigation, and/or Associated Actions
<b>Air Quality</b>	None	Minimal impacts during construction	None
<b>Biological Resources</b> (including fish, wildlife, and plants)	None	Tree removal	<ul style="list-style-type: none"> <li>■ Tree removal to occur during NLEB dormant season (October 1 – April 30)</li> <li>■ Implement April 2015 USFWS/USDOT NLEB avoidance and minimization measures</li> <li>■ Implement MnDNR Blanding's turtle avoidance measures</li> </ul>
			
Northern Long-eared Bat (NLEB)	Blanding's Turtle		
<b>Climate</b>	None	None	None
<b>Coastal Resources</b>	N/A	N/A	None
<b>DOT Section 4(f) Lands</b>	N/A	N/A	None
<b>Farmlands</b>	None	43 acres converted directly or indirectly	To be determined
<b>Hazardous Materials, Solid Waste, and Pollution Prevention</b>	None	None	Dispose of construction materials and other solid waste in accordance with state and local laws.

# Preliminary Summary of Environmental Effects

Environmental Analysis Category	Effects: <i>Baseline Alternative (No Expansion Alternative)</i>	Effects: <i>Preferred Alternative</i>	Required Permitting, Mitigation, and/or Associated Actions
<b>Historic, Architectural, Archaeological, and Cultural Resources</b>	None	None	Awaiting SHPO concurrence with FAA determination of effect
<b>Land Use</b>			
<i>Residential</i>	Potential Zoning Conflicts	Potential Zoning Conflicts	Convene Joint Airport Zoning Board (JAZB) to develop an Airport Zoning ordinance
<i>Ground Transportation</i>	RPZ Conflicts	Increased travel time on 30th Street	None
<i>Wildlife Attractants</i>	Wetlands in vicinity of runway approach	Wetlands in vicinity of runway approach	To be determined
<b>Natural Resources and Energy Supply</b>	None	None	None
<b>Noise and Compatible Land Use</b>	None	None	Update voluntary noise abatement plan and hold educational briefings for pilots
<b>Socioeconomics, Environmental Justice, and Children’s Health &amp; Safety</b>	None	None	None



# Preliminary Summary of Environmental Effects

Environmental Analysis Category	Effects: <i>Baseline Alternative (No Expansion Alternative)</i>	Effects: <i>Preferred Alternative</i>	Required Permitting, Mitigation, and/or Associated Actions
<b>Visual Effects</b> (including airfield lighting)	None	Existing light system relocations and new light system installations	To be determined
<b>Water Resources</b>			
<i>Wetlands</i>	None	1.97 acres direct wetland impact	<ul style="list-style-type: none"> <li>■ Compensatory Mitigation Plan (assume impact will be banked)</li> <li>■ USACOE 404 Army Corps Permit and Compliance with Minnesota Wetland Conservation Act</li> <li>■ MnDNR Public Waters permit</li> </ul>
<i>Stormwater</i>	None	12.6 acres increased impervious area	<ul style="list-style-type: none"> <li>■ Stormwater Pollution Prevention Plan</li> <li>■ On-Site Best Management Practices</li> <li>■ MPCA CWA Section 401 Water Quality Certification and NPDES permit</li> <li>■ VBWD permit</li> </ul>
<b>Cumulative Impacts</b>	None	Under evaluation	To be determined





## Environmental Assessment Lake Elmo Airport

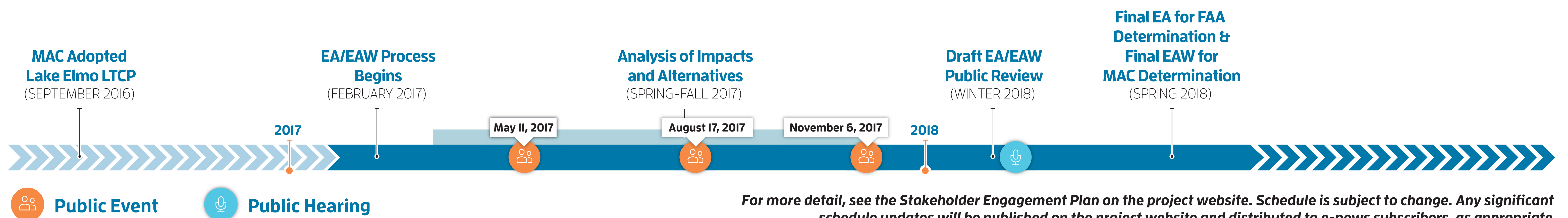




# Anticipated EA/EAW Timeline

## Next Steps:

-  **Complete Evaluation of Effects**
-  **Publish Draft EA/EAW** (begins public comment period)
-  **Hold Public Hearing**
-  **Finalize EA/EAW**



Environmental Assessment  
Lake Elmo Airport



# Environmental Analysis Categories

- **Air Quality**
- **Biological Resources** (including fish, wildlife, and plants)
- **Climate**
- **Coastal Resources**
- **Department of Transportation Act, Section 4(f)**
- **Farmlands**
- **Hazardous Materials, Solid Waste, and Pollution Prevention**
- **Historic, Architectural, Archeological & Cultural Resources**
- **Land Use**
- **Natural Resources and Energy Supply**
- **Noise and Compatible Land Use**
- **Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety**
- **Visual Effects** (including light emissions)
- **Water Resources** (including wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers)

Environmental Assessment  
Lake Elmo Airport







# Purpose & Need Goals

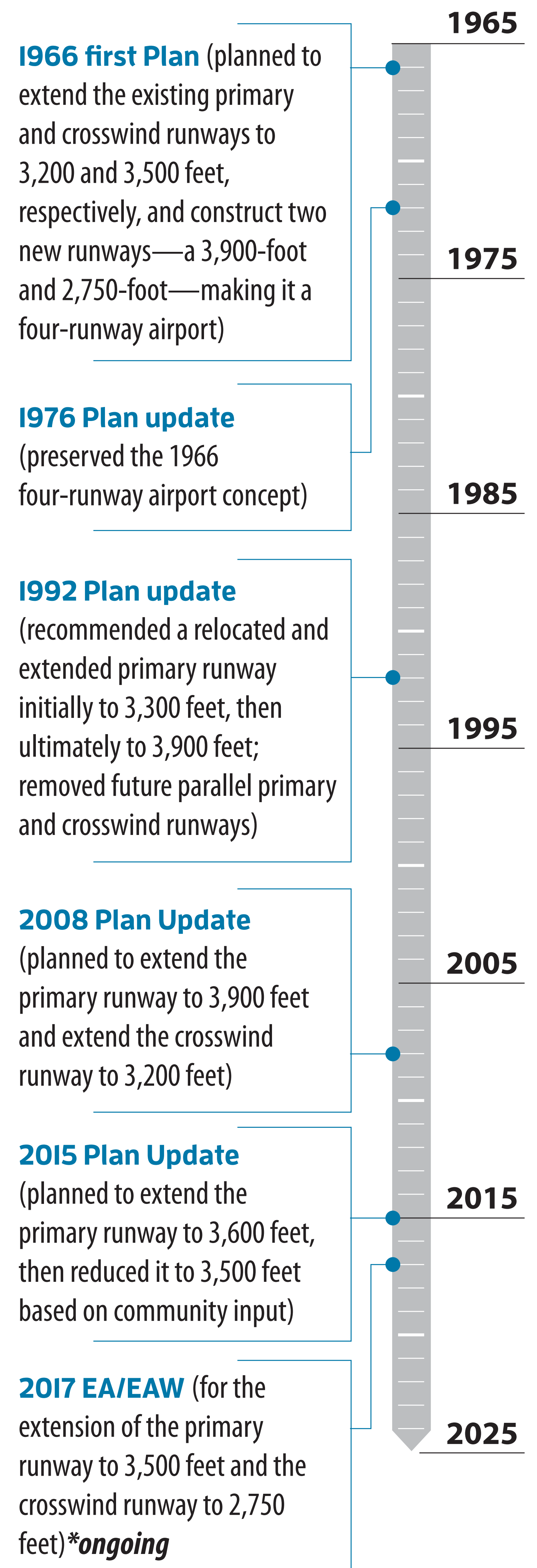
## The **PURPOSE** of the proposed improvements:

- 1 Address and attend to the airport's failing, end-of-life infrastructure;
- 2 Enhance safety for airport users and neighbors; and
- 3 Improve facilities for the types of aircraft using, and expected to use, the airport.

## The **NEED** for the proposed improvements:

- 1 Existing runway pavements are deteriorating and, for safety's sake, need to be replaced.
- 2 The primary runway has several incompatible land uses within its runway protection zones (RPZs), including a railroad and two public roads.
- 3 The existing runway lengths do not meet the needs of current aircraft operators and their aircraft.
- 4 The airport lacks the most current navigational technology for landing aircraft.

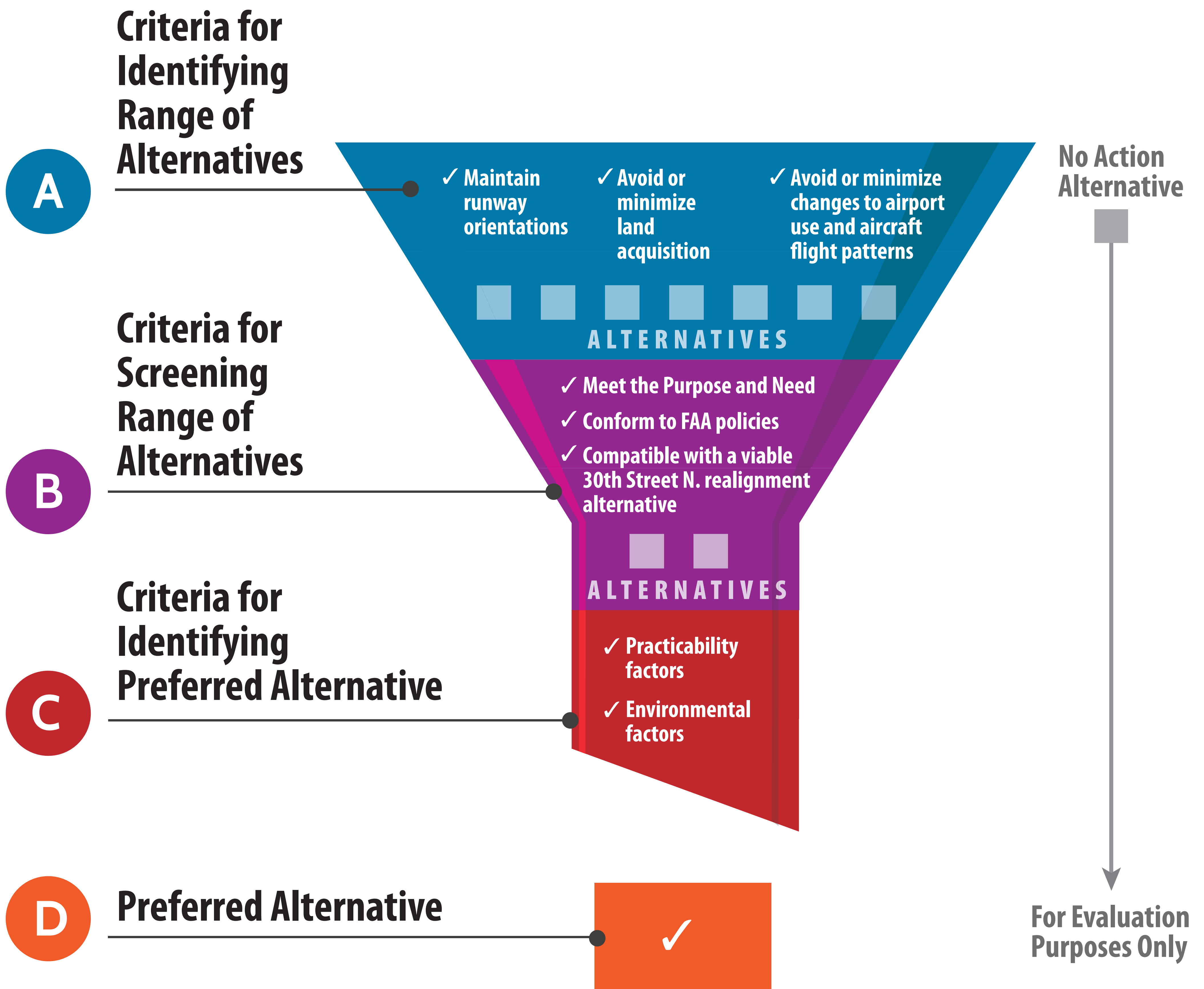
## Lake Elmo Airport Project History 1966 to 2017



# Environmental Assessment Lake Elmo Airport



# Runway Alternatives Evaluation Process



## Environmental Assessment Lake Elmo Airport







# Runway Length Needs

RUNWAY LENGTH IN FEET

EXISTING RUNWAY 14/32 LENGTH: 2,849'

PROPOSED RUNWAY 14/32 LENGTH: 3,500'

500 1,000 1,500 2,000 2,500 3,000 3,500 4,000 4,500 5,000 5,500 6,000 6,500 7,000 7,500

## Aircraft Type

CESSNA 340



BEECH BARON 58



PILATUS PC-12



BEECH KING AIR 200



SOCATA TBM 700



CITATION MUSTANG



CITATION EXCEL



CITATION X

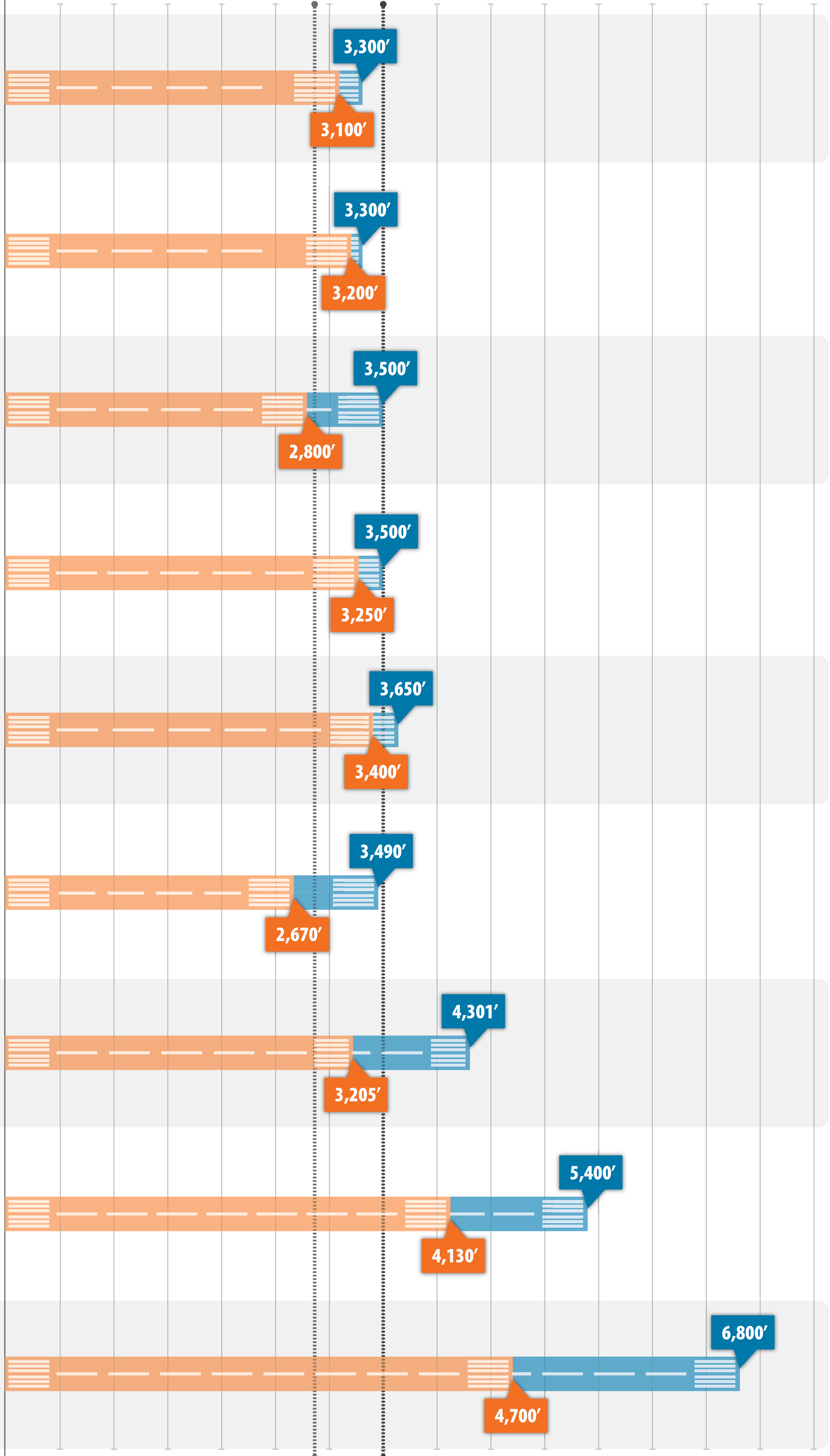


GULFSTREAM IV



DESIGN AIRCRAFT

JET AIRCRAFT



60% USEFUL LOAD

90% USEFUL LOAD

**NOTE:** Propeller-driven aircraft runway lengths are based on accelerate-stop distances and jet-driven aircraft runway lengths are based on balanced field length takeoff distances, as identified in the respective aircraft performance manuals. Accelerate-stop distance is the length required to accelerate from a full stop to near lift off speed and then decelerate to a full stop. Balanced field length considers the accelerate-stop distance along with other safety factors as required for federal certification of these larger aircraft types. Lengths are calculated for a temperature of 82.3° Fahrenheit, a field elevation of 933 feet above mean sea level, and typical takeoff flap settings.

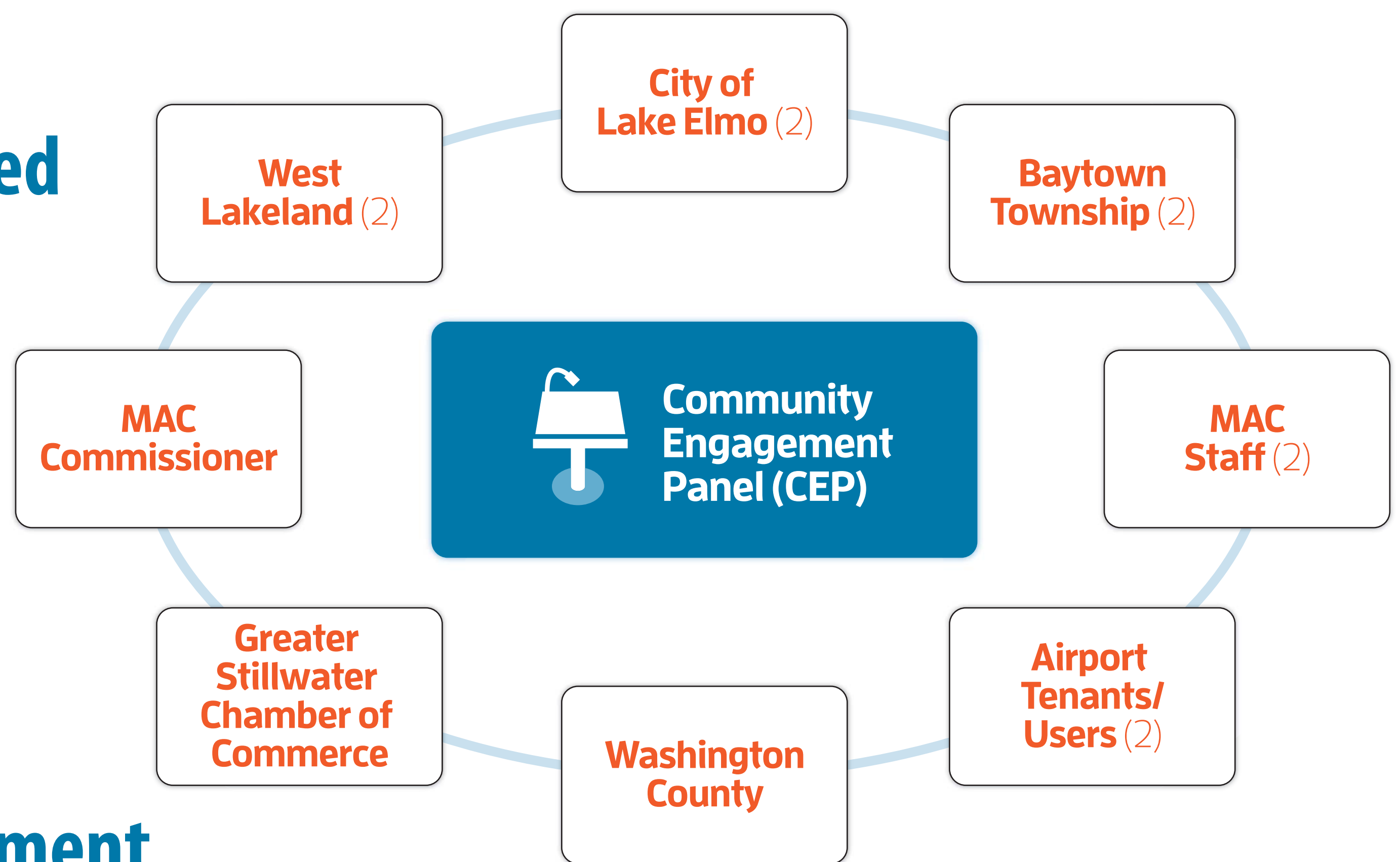
## Environmental Assessment Lake Elmo Airport





# Stay Involved!

The MAC is committed to a transparent and open community involvement process and has established a Community Engagement Panel (CEP) for this project.



This is an advisory panel representing a diverse group of community stakeholders, including government representatives and staff, airport users, and local residents.

 Sign-up to receive updates via our e-news subscription program

 Check out the project website for up-to-date information

 Attend the four public events to learn more about the project

 Share your thoughts via the "Contact Project Team" tab of the website or on the comment forms at the public events

Project Website 

[www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment.aspx)

## Environmental Assessment Lake Elmo Airport





# Lake Elmo Airport

## Environmental Assessment (EA)/ Environmental Assessment (EAW) Worksheet



November 6, 2017 – Public Event #3  
Overview of Environmental Effects

L-313





# Agenda

- Concerns we've heard from airport neighbors
- Environmental effects overview
- Next steps



# Concerns We've Heard from Airport Neighbors

- The proposed airport improvements are not justified
  - the existing primary runway length is adequate
  - the improvements are not needed to enhance safety
- The surrounding homes will be impacted by additional air traffic, jet traffic and associated noise levels
- Estimates of existing aircraft activity levels are inaccurate
- The plan has become outdated
- Realignment of 30th Street N will disrupt emergency response times and pose safety concerns to travelers
- Realignment of 30th Street N will cause a maintenance burden for West Lakeland Township
- Environmental impacts to wetlands, wildlife habitats and trees
- Impacts to property values
- Quality of life concerns
- Impacts of future state safety zoning
- Proposed airfield lighting changes
- Project costs and fiscal responsibility
- Impact to local taxes
- The airport improvements do not provide benefit to the surrounding community
- Residents in newly developed areas adjacent to the airport are not aware of the planned improvements
- Public engagement has been inadequate



1

Is the environmental category relevant to the proposed development?

YES

NO

No Further Analysis Required

Environmental Category Relevant

- Collect Data
- Evaluate Effects
- Determine Required Permitting/Mitigation

2

Are effects "significant" based on FAA-established thresholds and factors?

YES

NO

No Further Analysis Required

Significant Effects Considering FAA Evaluation

- Federal Aviation Administration (FAA) Conducts Environmental Impact Statement (EIS)

# Environmental Effects Overview

- NEPA categories considered in detail
  - Air quality
  - Biological resources
  - Cultural resources
  - Farmlands
  - Hazardous materials & solid waste
  - Land Use
  - Noise
  - Visual effects
  - Water resources
- Other NEPA categories
  - Climate
  - Coastal resources
  - DOT Section 4(f)
  - Natural resources and energy supply
  - Socioeconomics





# Biological Resources

- Tree removal
  - Approximately 20 acres of trees affected on airport property
  - Off-site trees are being evaluated in coordination with FAA
- Federal and state-listed species
  - Northern long-eared bat
  - Rusty patched bumblebee
  - Blanding's turtle
  - Impacts will be avoided and minimized using measures recommended by MnDNR and U.S. Fish & Wildlife Service

## Tree Removal (pink areas)



# Air Quality

- Operational & construction emissions were evaluated with reference to:
  - National Ambient Air Quality Standards (NAAQS)
  - Clean Air Act requirements
- Emissions will not exceed FAA thresholds for NAAQS pollutants

# Cultural Resources

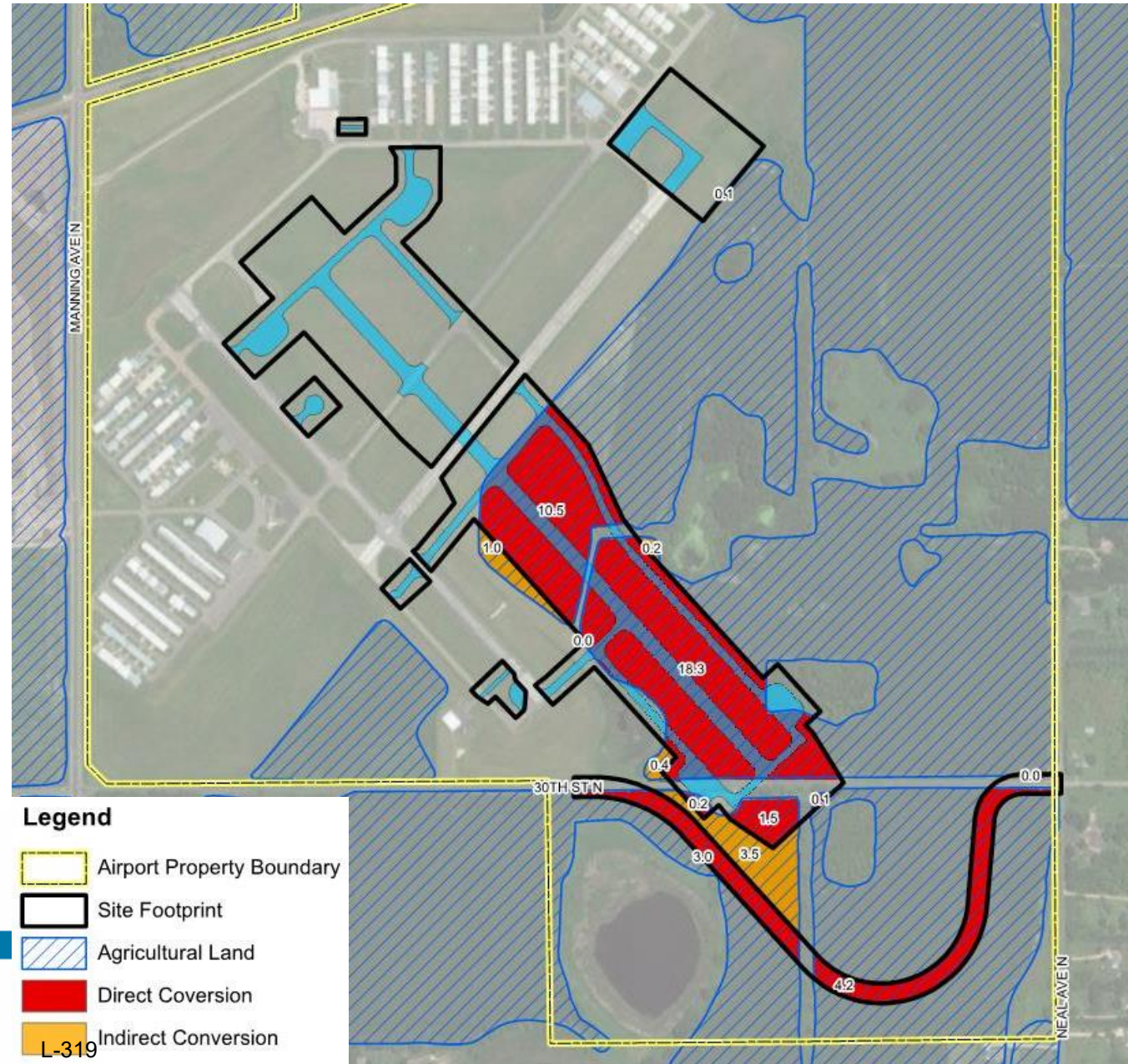
- Cultural resources (above and below ground) were evaluated with reference to the National Historic Preservation Act (NHPA) requirements
- FAA determined no effect to cultural resources; awaiting State Historic Preservation Office (SHPO) concurrence
- FAA is also consulting with Native American tribes





# Farmlands

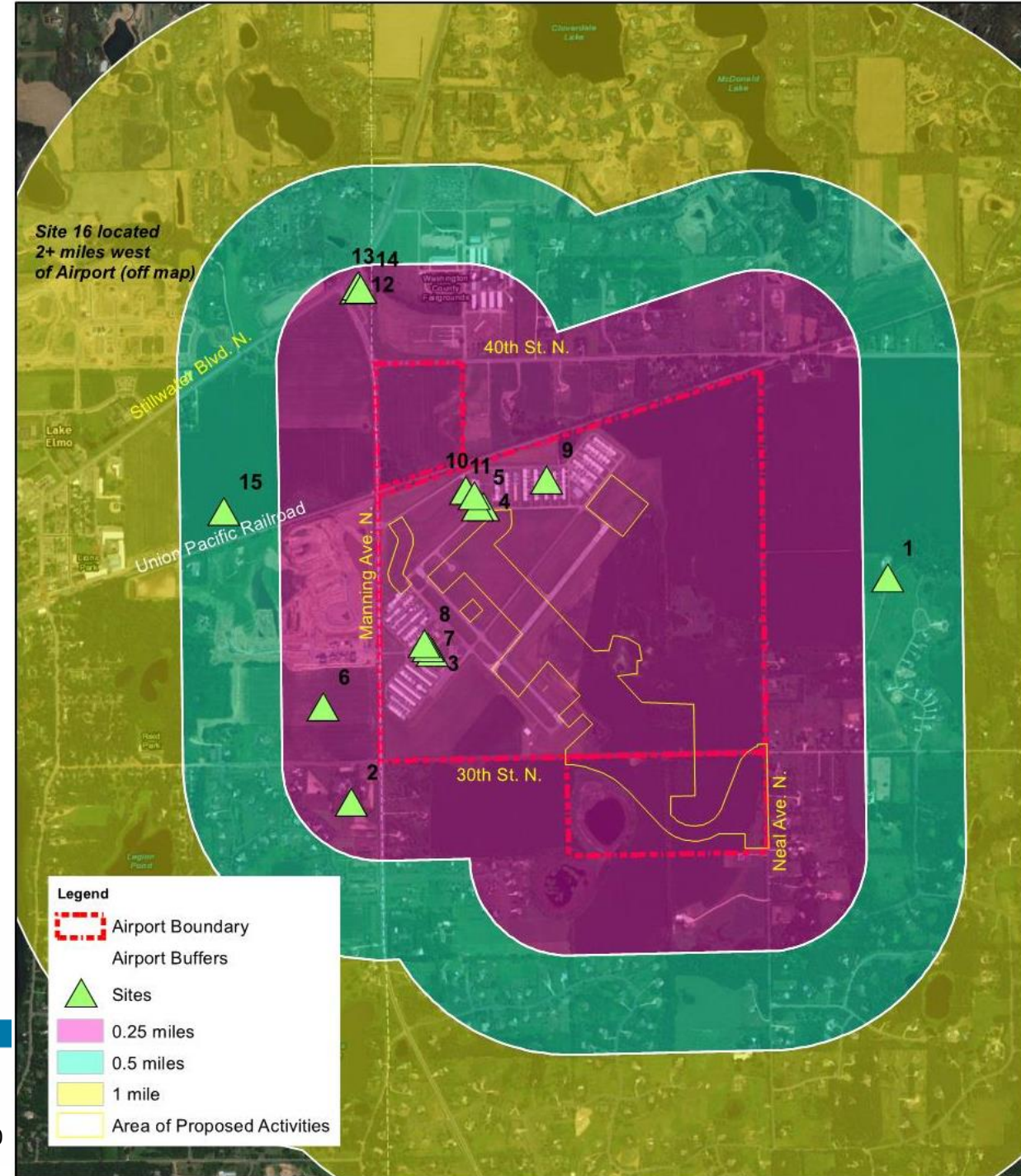
- Farmlands were evaluated with respect to federal Farmland Protection Policy Act (FPPA)
- Approximately 43 acres of on-airport farmland would be converted
- U.S. Department of Agriculture consultation in process to establish significance of effects



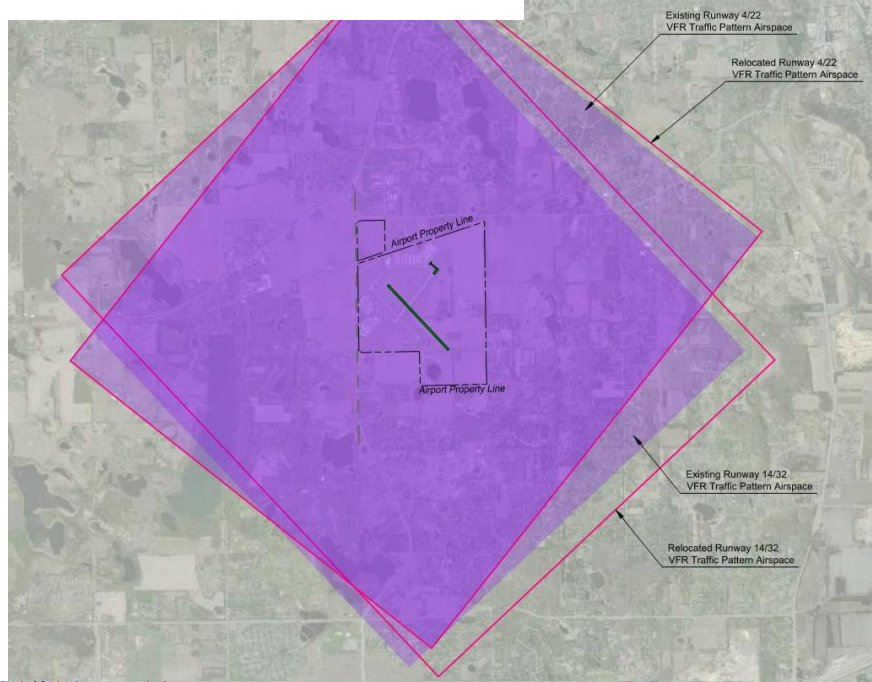


# Hazardous Materials & Solid Waste

- Known hazardous materials sites identified within one mile of Airport
  - None will be affected by project
- Groundwater contamination plume would not be affected due to water table depth

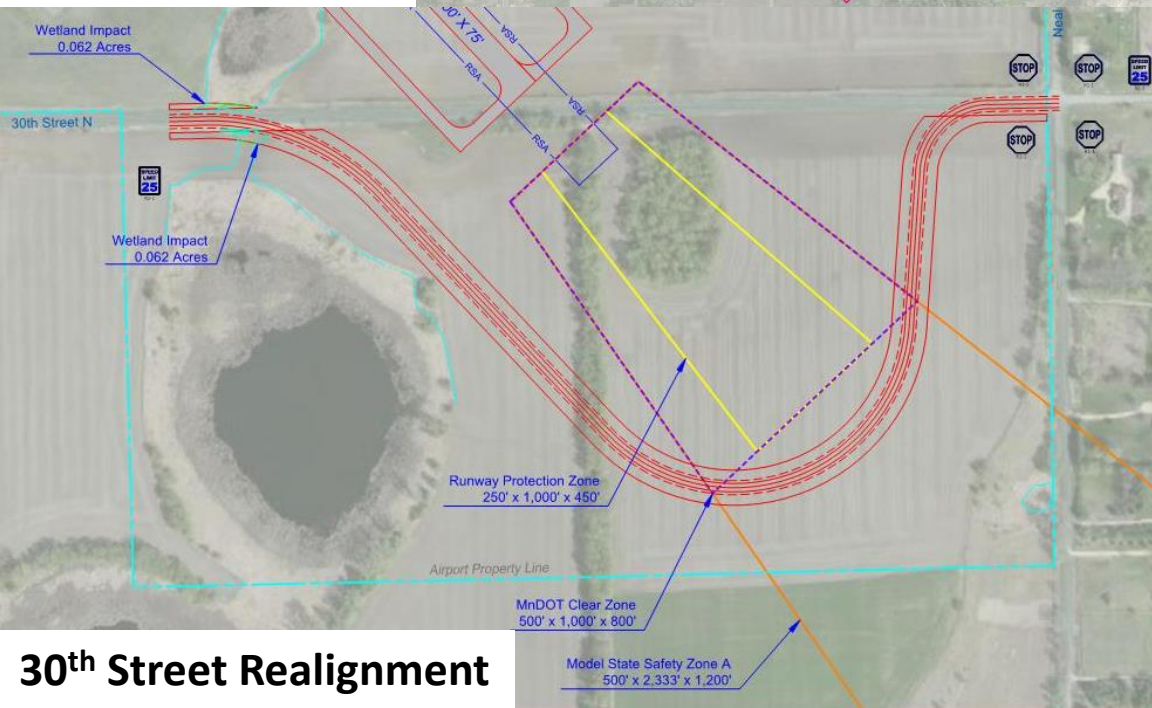


## VFR Traffic Pattern Area



# Land Use

- Residential
  - Minor changes to visual flight rules (VFR) traffic pattern area
  - The MAC will convene a Joint Airport Zoning Board (JAZB) consistent with Minnesota Statutes
- Ground Transportation
  - Realigned road can accommodate forecasted traffic volume and type
  - Travel time will increase an average of 46 seconds in either direction
- Wildlife Attractants
  - Tree removal and ag lease reductions result in fewer attractants



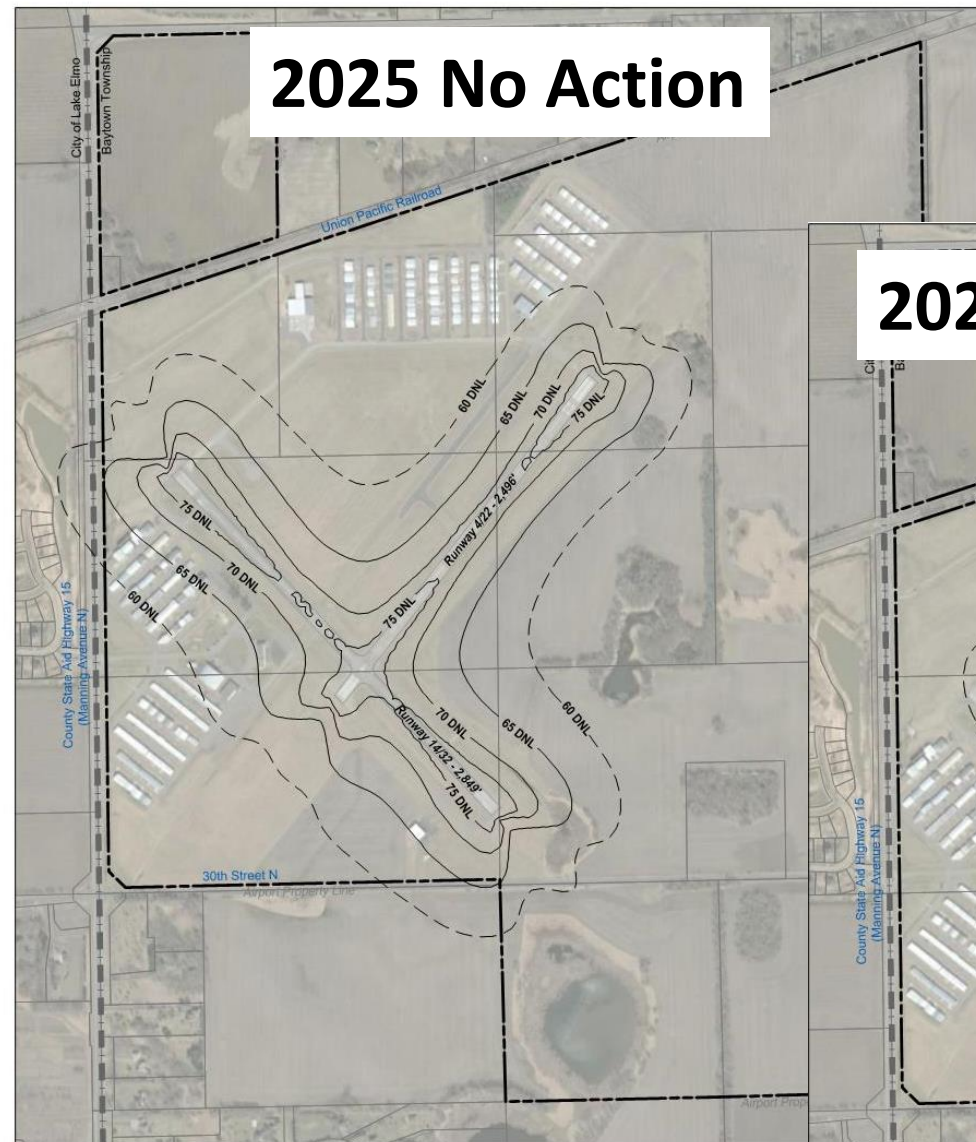
## 30<sup>th</sup> Street Realignment



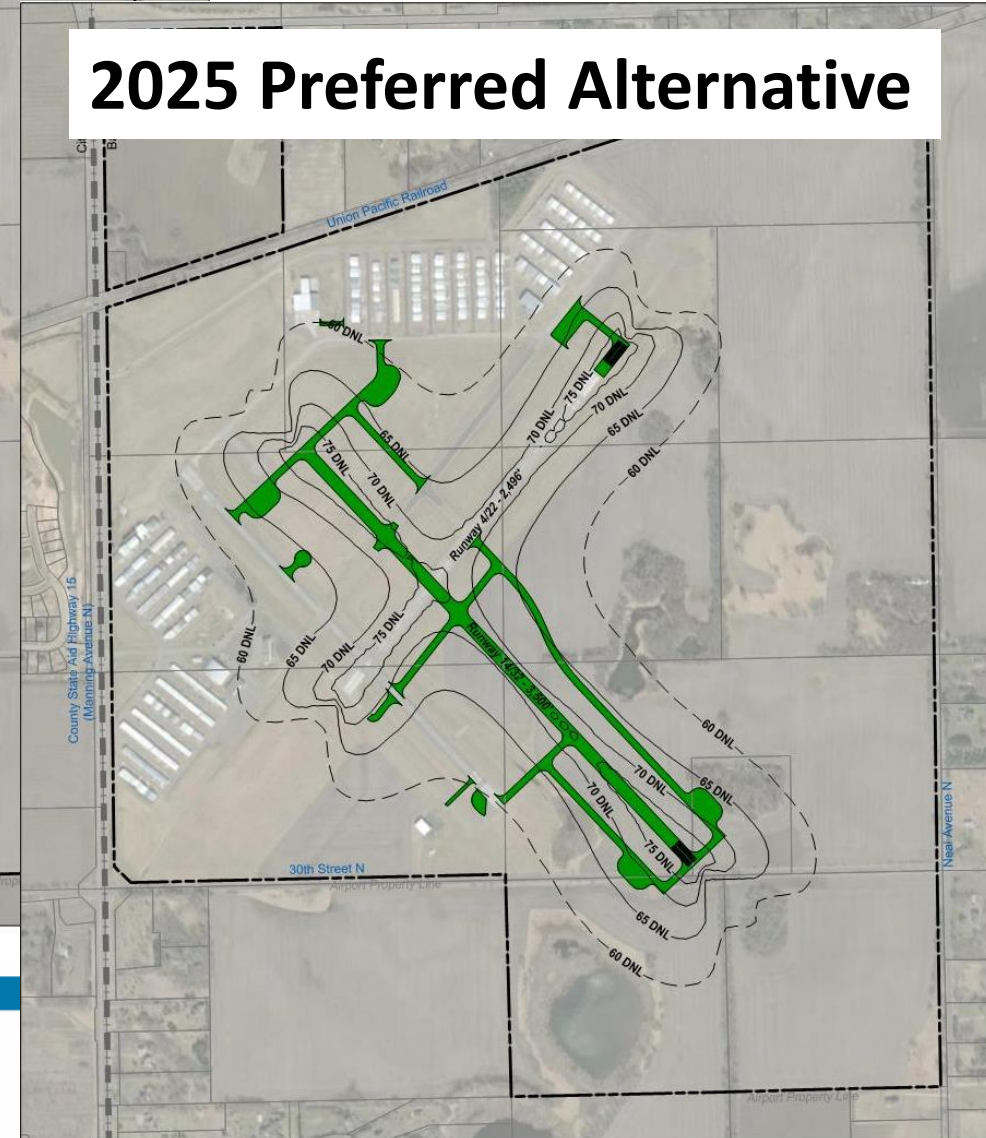


# Noise

- 65 decibel day night average sound level (DNL) noise contour remains on Airport property under both No Action and Preferred Alternatives



Note: Aircraft noise contour 60 DNL is shown for informational purposes only.

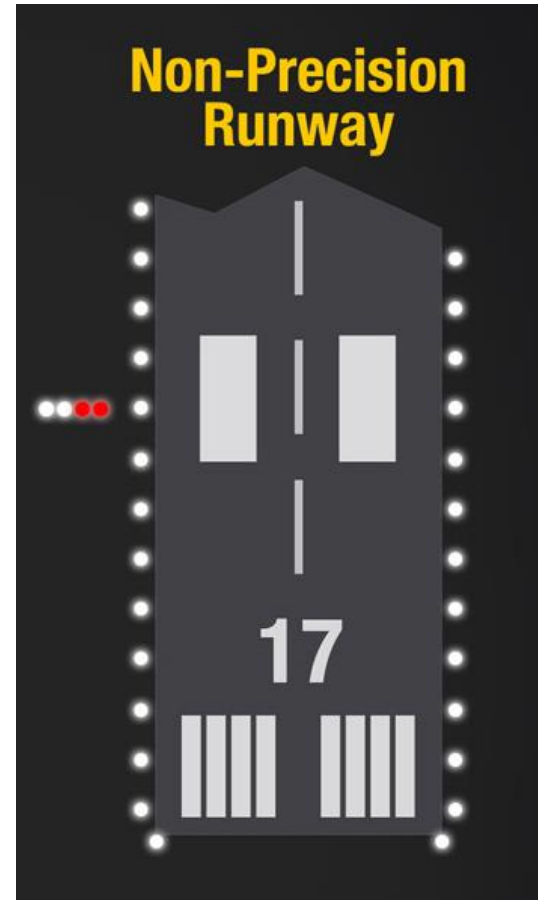


Note: Aircraft noise contour 60 DNL is shown for informational purposes only.



# Visual Effects

- Project lighting components
  - Relocate and extend existing Runway 14/32 non-precision systems
  - Install new Runway 04/22 non-precision systems
- Some systems will move closer to residential areas
  - Approximate 25% reduction in distance from light-sensitive areas
- Light systems will only be fully operational when “keyed on”
- Potential visual effect reduction strategies include:
  - Customized light settings
  - Light baffles
  - Fencing



Source: boldmethod.com

## Precision Approach Path Indicator (PAPI)



L-323

## Medium-Intensity Runway Lights (MIRL)



Source: Astronics

## Runway End Identifier Lights (REIL)

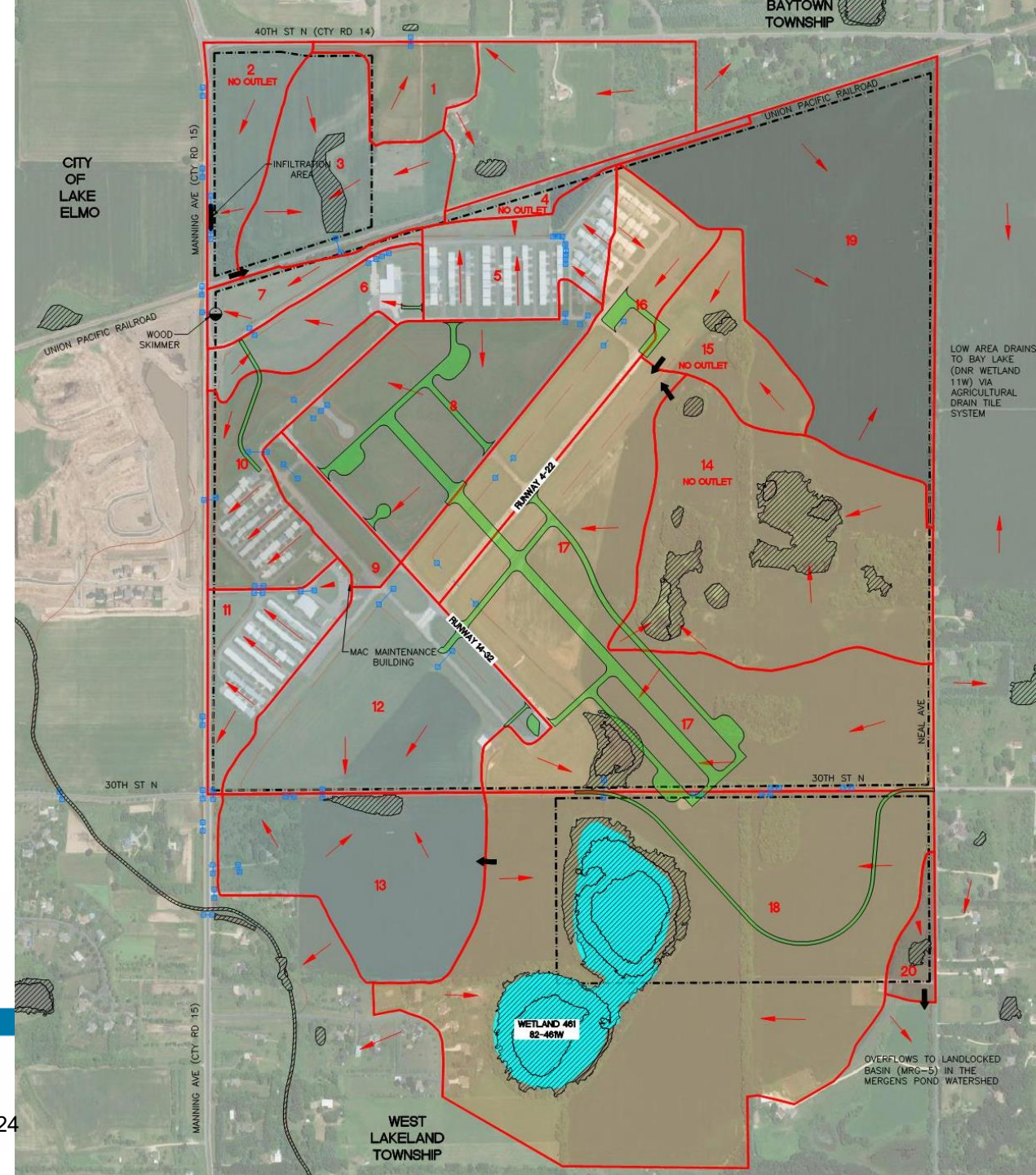


Source: Airport Lighting Company



# Water Resources

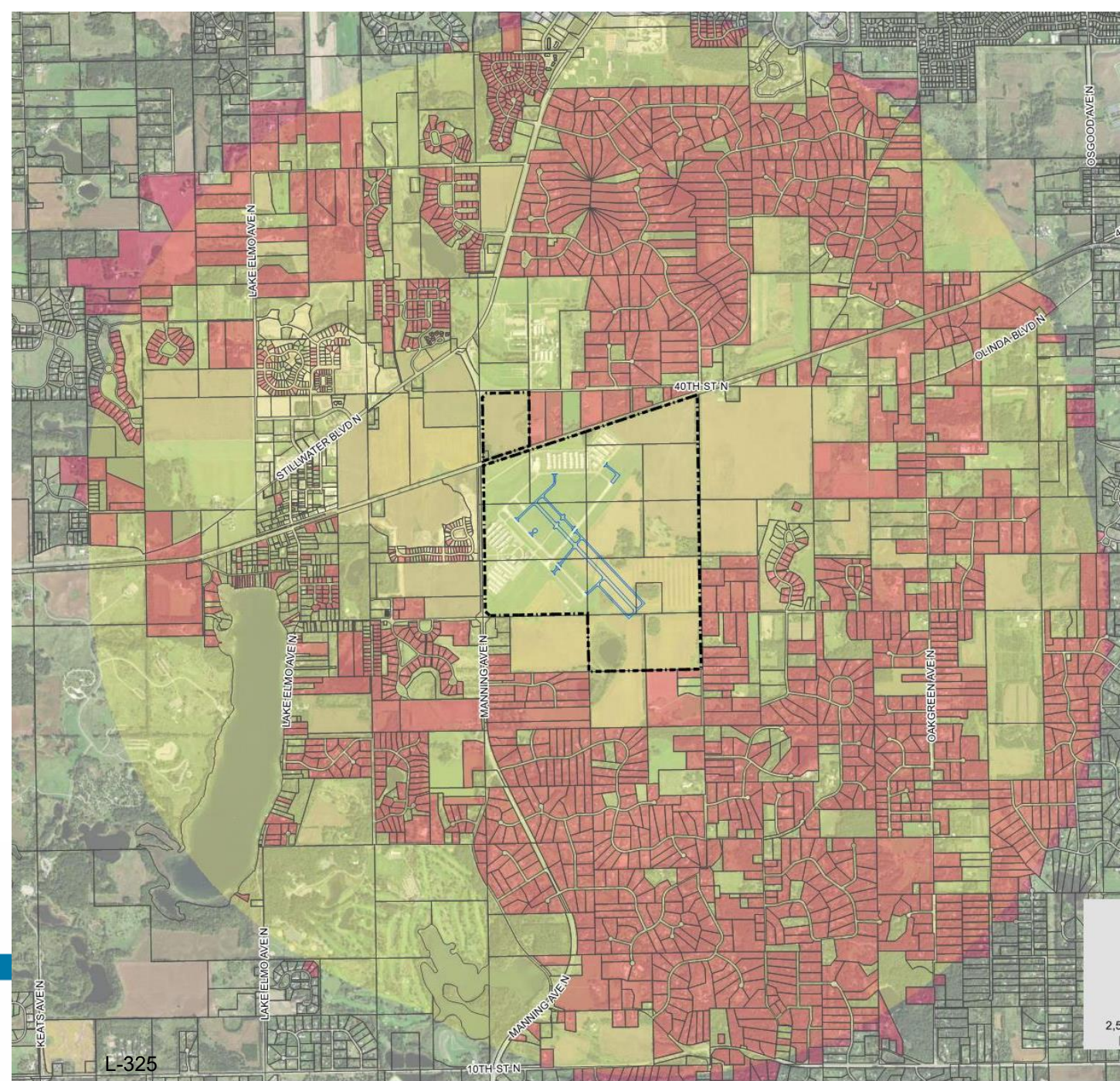
- Resources evaluated with respect to federal Clean Water Act and state Wetland Conservation Act
- Wetlands
  - Approximately 1.97 acres of direct wetland impacts
  - Wetland will be replaced at 2:1 ratio
- Surface Water
  - Net increase of 550,000 square feet impervious surface
  - Federal, State, and local standards require specific performance standards for stormwater management





# Cumulative Effects

- Past, present, and reasonably foreseeable actions
  - 1,720 parcels developed since 1964 within two miles of project
  - Continued urban development expected, especially west of the airport
  - Manning Avenue planned to widen from two to four lanes



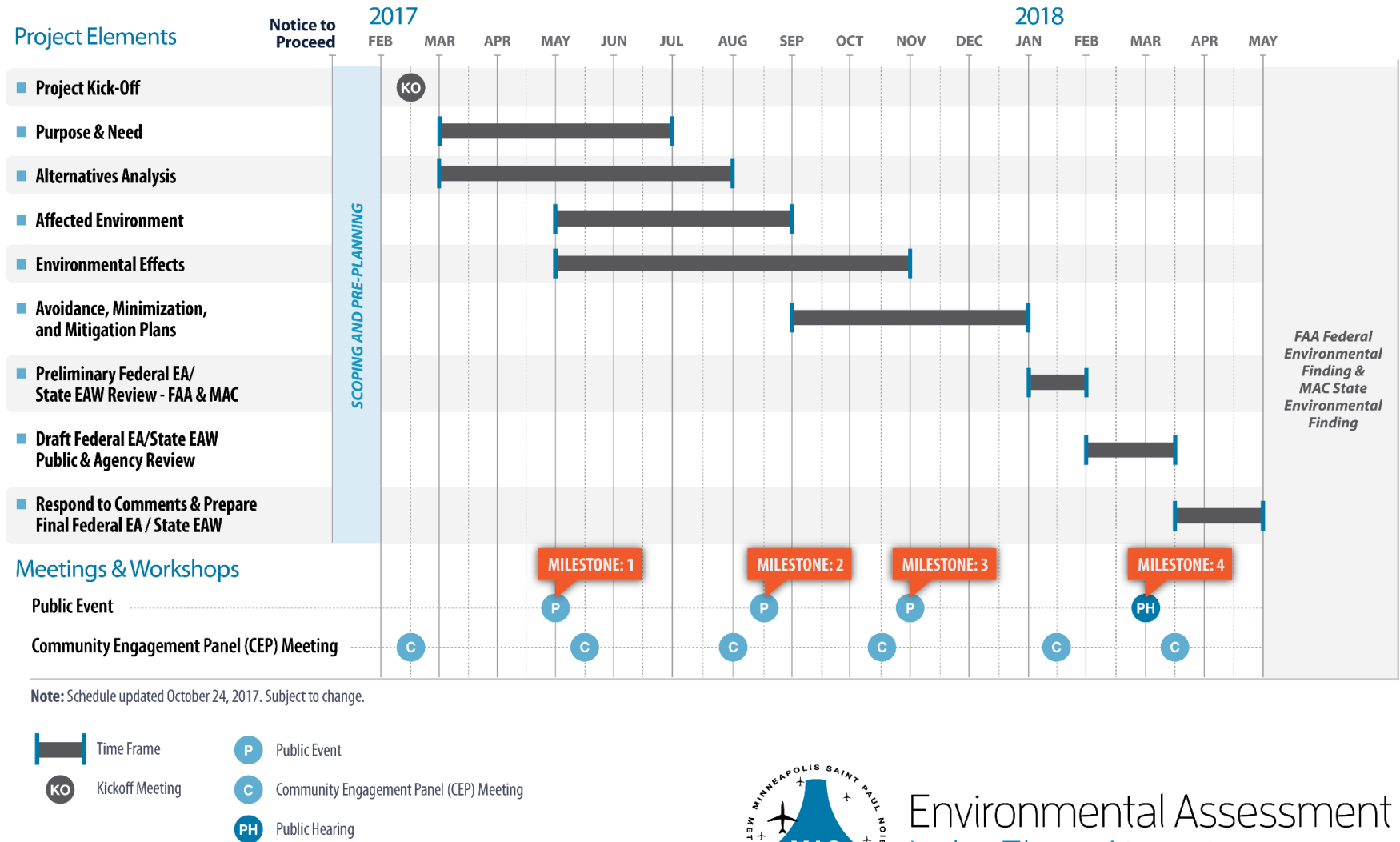


Summary of Environmental Effects (DRAFT)				
Environmental Impact Category	Effects: No-Action Alternative	Effects: Preferred Alternative	Required Permitting, Mitigation, and/or Associated Actions	
<b>Air Quality</b>	None	Minimal impacts during construction	None	
<b>Biological Resources (including fish, wildlife, and plants)</b>	None	Tree removal	<ul style="list-style-type: none"> <li>Tree removal to occur during NLEB dormant season (October 1 – April 30)</li> <li>Implement April 2015 USFWS/USDOT NLEB avoidance and minimization measures</li> <li>Implement MnDNR Blanding's turtle avoidance measures</li> </ul>	
<b>Climate</b>	None	None	None	
<b>Coastal Resources</b>	NA	NA	None	
<b>DOT Section 4(f) Lands</b>	NA	NA	None	
<b>Farmlands</b>	None	43 acres converted directly or indirectly	To be determined	
<b>Hazardous Materials, Solid Waste, and Pollution Prevention</b>	None	None	Dispose of construction materials and other solid waste in accordance with state and local laws.	
<b>Historic, Architectural, Archaeological, and Cultural Resources</b>	None	None	Awaiting SHPO concurrence with FAA determination of effect	
<b>Land Use</b>	<b>Residential</b>	Potential zoning conflicts	Potential zoning conflicts	Convene Joint Airport Zoning Board (JAZB) to develop an Airport Zoning ordinance
	<b>Ground Transportation</b>	RPZ conflicts	Increased travel time on 30 <sup>th</sup> Street	None
	<b>Wildlife Attractants</b>	Wetlands in vicinity of runway approach	Wetlands in vicinity of runway approach	To be determined
<b>Natural Resources and Energy Supply</b>	None	None	None	
<b>Noise and Compatible Land Use</b>	None	None	Update voluntary noise abatement plan and hold educational briefings for pilots	
<b>Socioeconomics, Environmental Justice, and Children's Health &amp; Safety</b>	None	None	None	
<b>Visual Effects (including light emissions)</b>	None	Existing light system relocations and new light system installations	To be determined	
<b>Water Resources</b>	<b>Wetlands</b>	None	1.97 acres direct wetland impact	<ul style="list-style-type: none"> <li>Compensatory Mitigation Plan (assume impact will be banked)</li> <li>USACOE 404 Army Corps Permit and Compliance with Minnesota Wetland Conservation Act</li> <li>MnDNR Public Waters permit</li> </ul>
	<b>Stormwater</b>	None	12.6 acres increased impervious area	<ul style="list-style-type: none"> <li>Stormwater Pollution Prevention Plan</li> <li>Onsite Best Management Practices</li> <li>MPCA CWA Section 401 Water Quality Certification and NPDES permit</li> <li>VBWD permit</li> </ul>
	<b>Floodplains</b>	None	0.06-acre wetland fill area in floodplain	VBWD permit
<b>Cumulative Impacts</b>	None	Under evaluation	To be determined	

Green shaded items represent categories for which impacts and associated actions have been definitively determined. Additional findings in other categories may be included in the draft EA/EAW.

# Next Steps

1. CEP Meeting #5
2. Publish Draft EA/EAW for public review and comment
3. Public Hearing
4. Comments received will be included and responded to in the Final EA/EAW







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## Appendix M – Public Comments and Responses

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## Public Comments and Responses

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### Introduction

A Draft EA/EAW for proposed improvements at Lake Elmo Airport was issued for public and agency review and comment on February 26, 2018. The notice of availability of the draft document and public hearing held April 4, 2018, was published in local newspapers, the Minnesota Environmental Quality Board (EQB) *Monitor* newsletter, and the Minnesota State Register. These notices and/or associated affidavits of publication are included at the end of this appendix. A public hearing was held on April 4, 2018, to accept comments from interested citizens. Sign-in sheets from the public hearing are also included at the end of this appendix. Written comments were accepted until the comment period closed at 5:00 pm April 19, 2018.

During the public comment period the MAC received 86 comments from 71 individual members of the public. This includes verbal and written comments submitted at the April 4, 2018, public hearing, mailed comments, and emailed comments. Eight individuals submitted multiple comments. Sixty comments expressed opposition to the project as presented in the EA/EAW, and twenty-four expressed support. Two comments were neutral or a position could not be determined.

Seven comments were received after the end of the comment period. Three of these comments were submitted by individuals with no previous comment on the record, while the other four comments were in addition to verbal or written comments the individual had already submitted during the comment period. These comments are included in this appendix. The MAC has responded to the comments but did not reflect them in the above totals.

Many of the comments from concerned community members were similar in content. General responses were developed to respond to those comments. Other comments contained unique content, and specific responses to these are provided in the detailed comment matrix following these general responses. The following comment themes are included in the general comment responses:

- A. Changing the Airport role by attracting larger aircraft
- B. Realignment of 30th Street North
- C. Other alternatives are more appropriate
- D. Aircraft noise
- E. Airfield lighting and fencing
- F. Zoning and incompatible land use
- G. Community compatibility and neighborhood character
- H. The plan is outdated
- I. Public involvement was inadequate
- J. Justification for the project
- K. Reduction in property values
- L. Habitat and wildlife impacts
- M. Tree removal



- N. Water contamination
- O. Aircraft operations estimates
- P. Proposed runway length
- Q. Pilot/community relations
- R. Project cost and source of funding
- S. Compensation for impacts
- T. MAC should complete an Environmental Impact Statement
- U. Requests for a personal response

All written comments and a transcript of the April 4<sup>th</sup> public hearing are reproduced in their entirety at the end of this comment summary.

## Responses to Comment Themes

### A. Changing the Airport role by attracting larger aircraft

This section includes responses to comments that focused upon the potential for attracting larger aircraft or more aircraft traffic to the Airport, and concerns about the longer runway changing the character of the airport away from primarily recreational, personal, and flight training users.

#### i. The expanded runway will attract larger aircraft and more aircraft traffic

Several comments expressed concern that the additional runway length would attract larger aircraft, including jets, and more aircraft traffic to Lake Elmo. These commenters were apprehensive about whether the project might change the Airport's role and its impacts to the community.

The proposed primary runway length of 3,500 feet is based on propeller aircraft requirements. In reality, nearly all jet aircraft need more than 3,500 feet to safely and efficiently take off and land. Lake Elmo's primary runway—at 3,500 feet—has been designed for propeller-driven airplanes that weigh less than 12,500 pounds and have fewer than 10 passenger seats—the same class of aircraft using the Airport today. This is consistent with the purpose and need of the project to increase the margin of safety and improve facilities for the aircraft operating at the Airport. Moreover, the St. Paul Downtown Airport is well-suited to handle larger jet aircraft and the MAC is not proposing the airfield improvements at Lake Elmo Airport to duplicate nor compete with the role of St. Paul Downtown.

Regarding aircraft traffic, for the next 20 years, Lake Elmo Airport is expected to experience between 24,000 and 27,000 flights annually. As explained in Appendix A to the EA/EAW document, future estimates of aircraft activity, based on the proposed scenario to extend the main runway to 3,500 feet, are similar to what is occurring today. Single-engine piston aircraft are expected to continue operating with the most regularity, contributing to 93.0% of flights. Multi-engine piston aircraft are anticipated to account for 2.5% of flights, helicopters for 3.4%, turboprop aircraft for 1.0%, and light jets are expected to remain near 0.1%. Some commenters were concerned about helicopter operations increasing. The objectives of the proposed airport improvements do not include increasing helicopter activity. In fact, the forecast analysis completed by Mead & Hunt in Appendix A shows an expected decrease in helicopter activity. Other commenters have expressed that the aircraft on the larger end of the design aircraft family and not

based at Lake Elmo should not be considered in the runway length evaluation. The detailed fleet-mix and runway length needs evaluation contained in Appendix A confirmed the design aircraft family at the Airport to be the small, propeller-driven aircraft weighing less than 12,500 pounds with fewer than 10 passenger seats. It is important to note that the airplanes used to determine the proposed primary runway length may not be based (i.e. stored) at the Airport, but according to the MAC's Noise and Operations Monitoring System (MACNOMS) and the FAA's Traffic Flow Management System Counts (TFMSC) data, they have used the Airport on a transient basis (i.e. arrive from other airports at which they are based).

Federal grant provisions require that the airport be operated in a manner that does not discriminate on the basis of type or class of aircraft or aviation activity and does not restrict or place an undue burden on interstate commerce. The MAC acknowledges that jet aircraft do and may use the airport in the future, as noted in the operations estimates and forecasts presented in Appendix A of the EA/EAW. However, jet aircraft usage is infrequent and is expected to remain infrequent, increasing from 3 annual operations in 2016 to 27 annual operations in 2035.

**ii. The EA/EAW references business users, but Lake Elmo is only an airport for hobby users; business use means larger aircraft**

Lake Elmo Airport already hosts pilots who use the Airport for business purposes in addition to those who use the Airport for personal, recreational, and flight training purposes. In fact, approximately 24 percent of based aircraft at Lake Elmo Airport are registered to corporations according to the FAA's aircraft registration database. The family of aircraft at Lake Elmo is not expected to change as a result of the proposed project, which is designed for small aircraft (less than 12,500 pounds) with fewer than 10 passenger seats. The Airport primarily supports general aviation (GA) and air taxi operators. GA represents all civil aviation activity not defined as commercial and includes a variety of users and activities, including corporate and business operators, recreational users, flight training, agricultural applications, law enforcement, and other government uses. Air taxi represents for-hire, on-demand commercial activity that is conducted on an unscheduled basis. Various based and transient aircraft operate at Lake Elmo Airport, the majority of which are owned and operated by private individuals or entities.

**B. Realignment of 30<sup>th</sup> Street North**

This section contains responses to common concerns about realigning 30<sup>th</sup> Street North, including comments about a potential hazard posed by the new curve geometry, emergency vehicle access, and the location of the road related to residences.

**i. Concerns about the curvature of the roadway and emergency vehicle access**

Many comments expressed concern about the added curves to 30<sup>th</sup> Street North that will accommodate the relocated runway and ensure compatible land within the Airport's Runway Protection Zones. Common specific concerns about this realignment were related to the reduced speed on the curves, potential hazards for drivers due to the tight curve, and added time for emergency vehicle response.

While the Long-Term Comprehensive Plan (LTCP) process contemplated a viable option for relocating the roadway, for the EA/EAW the MAC researched additional options. Through this process the MAC kept

the public's expressed concerns about safety and travel time top of mind. The proposed runway length allows 30th Street North to tie in with the existing four-way intersection at Neal Avenue North and eliminates the need for a new intersection—a point of concern for the community during the LTCP process. Additional 30th Street North concepts were a main focus during this environmental review as the team set out to address the primary concerns expressed by the Community Engagement Panel (CEP): travel time and safety. New concepts were drawn up to effectively reduce travel time compared with the original plan, and to use a shallower curve; however, the proposed concepts were not supported by the community, which expressed concerns about introducing a cul-de-sac and potentially a roundabout in the roadway design as proposed by Alternative 4A. Several members of the CEP representing the community also perceived maintaining a 4-way stop at the intersection of 30<sup>th</sup> and Neal as the safest and best possible intersection type and opposed a t-intersection with through traffic on 30<sup>th</sup> and one-way stop control on Neal as proposed by Alternative 4B. Because these alternatives were not supported by the CEP members representing the community and the alternatives would be more expensive to construct, the EA/EAW did not carry them forward in the environmental evaluation.

The Airport and adjacent areas in Bayport and West Lakeland Townships to the immediate north, south, and east are within the Bayport Fire Department service area, while adjacent areas to the immediate west are within the City of Lake Elmo Fire Department service area. Because it is located outside the City of Lake Elmo, the proposed realignment of 30<sup>th</sup> Street North would not affect primary emergency response west of the Airport. The realigned segment of 30<sup>th</sup> Street North is located entirely within the Bayport Fire Department service area. The Bayport Fire Department headquarters building is located approximately four and a half miles northeast of and is an approximately seven-minute drive from the Airport. The project team met with Bayport City and Bayport Fire Department staff during the EA/EAW process to assess potential impacts to emergency response associated with the realignment of 30<sup>th</sup> Street North. The realignment of 30<sup>th</sup> Street North is not anticipated to be a detriment to initial emergency response times from the Bayport Fire Department to any locations within its service area. This conclusion is based on information provided by the Bayport Fire Department that indicates the affected segment of 30<sup>th</sup> Street North would not be used during its initial response to emergencies at any location within its service area. The primary use of 30<sup>th</sup> Street North with respect to emergency response would be for shuttling municipal water from hydrants in the City of Lake Elmo to replenish water capacity when fighting fires in areas east of the Airport that do not have water service. The Bayport Fire Department fleet has a combined water tank capacity of over 4,000 gallons, and is supported by mutual aid responders from Stillwater, Lower St. Croix, Lake Elmo, and Hudson with a combined fleet capacity of over 10,000 gallons. Based on fleet capacity and planned extension of water services to new residential areas immediately west of the Airport, there is no indication that the minor changes in travel times along 30<sup>th</sup> Street North represent an adverse effect to obtaining adequate water during firefighting events. The Bayport Fire Department concurs in this assessment. The realigned road concept and ensuing design will meet all applicable local and state standards.

More information about the studies done regarding the 30<sup>th</sup> Street North realignment can be found in Chapter 2 and Appendix B of the EA/EAW.



**ii. 30<sup>th</sup> will relocate right in front of homes**

Multiple commenters expressed concern about the proposed location of 30<sup>th</sup> Street North, saying that the new street would be located directly in front of their home or their neighbors' homes. Residents near the realigned road are concerned about how proximity to the road will affect their views, the value and safety of their homes, and the change in traffic patterns in their backyards.

Based on community input received during both the LTCP and EA/EAW processes, homeowners generally expressed a preference for a 30<sup>th</sup> Street North realignment concept that would not require realignment of any portion of Neal Avenue North and would maintain the existing 4-way intersection at 30<sup>th</sup> and Neal. The proposed realignment alternative (Alternative 3) meets these criteria. The north-south portion of the realigned segment of 30<sup>th</sup> Street North would be parallel to and more than 300 feet distant from Neal Avenue North. Alternative 3 also would not realign any road segment that intersects with residential driveways and would not introduce any new east-west vehicle trips onto Neal Avenue as under the original preferred alternative (Alternative 1).

**C. Other alternatives are more appropriate**

This section addresses alternatives that commenters identified as more feasible rather than the preferred alternative from the EA/EAW. Common suggestions included using alternate airports, the no-action alternative, and closing Lake Elmo Airport. More information about alternatives studied during the EA/EAW process can be found in Chapter 3. Use of alternate existing airports is studied in 3.2.2, and the no-action alternative is discussed in 3.2.1 and 3.3.2.

**i. New Richmond Regional Airport**

The New Richmond Regional Airport was identified by many commenters as a feasible alternative for pilots who need a longer runway than those at Lake Elmo. Many commenters also raised the issue of competition for FAA funds, and suggested sending the proposed funding for the Lake Elmo Airport project to New Richmond.

The following are reasons why use of New Richmond Regional Airport is not a viable alternative to the improvements proposed at Lake Elmo Airport:

1. MAC's legislative mandate to operate and maintain a system of airports: Under Minnesota Statutes 473.602, the MAC is invested with a legislative mandate to "promote the public welfare and national security; serve public interest, convenience, and necessity; promote air navigation and transportation, international, national, state, and local, in and through this state; promote the efficient, safe, and economical handling of air commerce; assure the inclusion of this state in national and international programs of air transportation; and to those ends to develop the full potentialities of the metropolitan area in this state as an aviation center, and to correlate that area with all aviation facilities in the entire state so as to provide for the most economical and effective use of aeronautic facilities and service in that area." In addition, under Minnesota Statutes 473.608, subd. 27, the MAC must "develop and implement a plan to divert the maximum feasible number of general aviation operations from Minneapolis-St. Paul International Airport to those airports designated by the federal aviation administration as reliever airports for Minneapolis-St.

Paul International Airport.” Lake Elmo Airport is an important part of the MAC’s general aviation reliever airports system and serves a vital function in allowing MAC to fulfill its legislative mandates. It is designated by FAA as a reliever airport for MSP and is one of six MAC system general aviation reliever airports in the Twin Cities metropolitan area. Providing appropriate facilities at Lake Elmo Airport to accommodate small propeller-driven aircraft for personal, recreational, and some business needs make it possible for MSP and the other MAC relievers to operate efficiently within their unique roles.

2. Airport role: The FAA designates Lake Elmo Airport as a Reliever Airport for MSP, which is defined under 49 U.S. Code §47102 as “an airport the Secretary designates to relieve congestion at a commercial service airport and to provide more general aviation access to the overall community.” The FAA further designates Lake Elmo Airport as a Regional General Aviation Airport, which is defined by the 2012 FAA ASSET study as an airport that “supports regional economies by connecting communities to statewide and interstate markets.” Therefore, Lake Elmo Airport plays important roles within the national airspace system that cannot be substituted by another airport in the region.

#### **ii. St. Paul Downtown Airport/Holman Field**

Other comments pointed to the St. Paul Downtown Airport/Holman Field as a viable alternative to replace the use of Lake Elmo Airport if there were types of traffic it could not accommodate in the current configuration. These comments often included a reference to a March 31, 2018 article in the Pioneer Press that reported a decline in operations at St. Paul Downtown Airport/Holman Field. In addition, commenters opined that MAC could not fulfill its mandate to make efficient and economic use of aeronautical facilities in the metro region by expanding one facility when another is underused.

The reasons that the use of an alternative airport instead of Lake Elmo is not a viable alternative are outlined above in the response regarding the New Richmond Regional Airport. Another consideration specific to St. Paul Downtown Airport/Holman Field is its MAC system role. The six relievers include St. Paul Downtown/Holman Field (STP), Anoka County-Blaine (ANE), Flying Cloud (FCM), Crystal (MIC), Airlake (LVN), and Lake Elmo (21D). The purpose of these airports is to relieve congestion at Minneapolis-St. Paul International Airport (MSP) by providing infrastructure to accommodate the region’s general aviation needs. To preserve capacity at MSP, it is vital that corporate aviation services be provided at the key relievers (STP, ANE, and FCM). The remaining reliever airports (MIC, LVN, and 21D) complement the key relievers by accommodating personal, recreational, and some business aviation users within a specific service area. Lake Elmo Airport is the only airport designated by the FAA to relieve congestion at MSP in Washington County, providing a critical direct air connection to the northeast suburbs and outlying areas of the Twin Cities. Use of other reliever airports in lieu of improving Lake Elmo Airport would not address the needs of the metropolitan airport system and would detract from each airport’s ability to serve its intended users and area.

#### **iii. No Action/Only repair existing infrastructure**

Several comments noted that the Airport is a valued part of the Lake Elmo community, but that changes to the size and layout are unwelcome. Many of these commenters supported the no action alternative or

repairing the existing infrastructure but making no other changes. However, this option does not meet project objectives for several reasons, as described in Chapter 3 of the EA/EAW.

The specific objectives of the Airport improvements, as outlined in Chapter 3 of the EA/EAW, are:

- 1) Improve the runway pavement conditions
- 2) Minimize incompatible land uses in the Runway Protection Zones
- 3) Meet runway length needs for users
- 4) Upgrade the instrument approach procedures

These objectives serve as a guide for evaluating a series of alternatives. The alternative to rehabilitate the runways without realigning and lengthening the primary runway would not satisfy the objective to minimize incompatible land uses within the Runway Protection Zone (objective 2) and the objective to meet runway length needs for existing users (objective 3). The estimated cost for reconstructing the existing airfield in its existing configuration is \$5.4 million. Investing these funds in a long-term solution that includes a realigned and extended runway more adequately addresses existing issues.

The FAA's policy to minimize incompatible land uses within the Runway Protection Zone is a major driver for relocating the runway. The relocated runway will move these zones completely within the Airport's boundaries, thus allowing MAC to keep them clear of incompatible land uses. Doing this also provides certainty for the surrounding communities and jurisdictions as they engage in their own future planning processes.

Objective 3 addresses a long-standing runway length deficiency. A runway length of 2,849 feet is a safety concern for pilots operating at the Airport today. Please reference the following comments from Airport pilots: 11A, 16F, 28F, 32C, 35C, 35D, and 56B.

Table 3-2 in Chapter 3 of the EA/EAW document provides further illustration of the no-action alternative as compared to other primary runway alternatives, regarding whether they meet the objectives of the purpose and need, conform to FAA standards, and are compatible with a viable 30<sup>th</sup> Street North realignment.

#### **iv. Close Lake Elmo Airport**

A few comments expressed a preference that the Airport be closed rather than improved. Because Lake Elmo Airport performs a critical function within the MAC reliever airport system and FAA National Plan of Integrated Airport Systems (NPIAS), closing the Airport without relocating it elsewhere is not a practicable alternative. Relocating the Airport is considered in Section 3.2.2 of the EA/EAW, which states that relocation of the Airport is not practicable or feasible because of land acquisition, relocating existing tenants, and other costs associated with construction of a new airport.

#### **v. Driving distance/time accuracy**

Regarding Table 3-1 in the EA/EAW, many commenters also expressed an opinion that it takes less than 30 minutes to reach the St. Paul Downtown Airport or South St. Paul Airport, and less than 35 minutes to



reach New Richmond. Other commenters opined that the driving times appeared to be accurate based upon their experiences.

The nature of driving in the metro area is that the amount of time it takes to reach one's destination differs depending upon the time of day and driving conditions. The EA/EAW document displays driving times with no traffic, including an estimate of 19 minutes to reach St. Paul Downtown Airport and 24 minutes to reach New Richmond Regional Airport. The EA/EAW also provides an estimate that accounts for heavy traffic, a frequent occurrence in the area. As described on page 3-4 of the EA/EAW these estimates reflected the longest travel times associated with either morning rush (7am-9am) or evening rush (3pm-6pm) traffic periods for a typical business day, using Google Maps' departure time and date function. Google Maps estimates future travel times by using historical travel times at a particular time-of-day and time-of-week to predict how long a trip will take. As stated in Section 3.2.2, the drive distance and drive time analysis presented therein demonstrates that Lake Elmo Airport "not only serves a specific function as a reliever airport in MAC's system of airports but also serves a specific geographic area that cannot be adequately served by another existing airport." This section does not state that the drive time analysis justifies inclusion of Lake Elmo Airport in the NPIAS. Lake Elmo Airport is designated by FAA as a reliever airport, which qualifies the airport as a NPIAS airport regardless of drive distance and drive time from Lake Elmo Airport to other NPIAS airports.

#### **D. Aircraft noise**

Many comments were primarily focused on aircraft noise, including existing noise, the potential for changes in aircraft noise due to the project, and concerns about increasing impacts of Airport noise on homes near the airport. Commenters were concerned about how noise was modeled, the accuracy of the model, and what types of aircraft the future scenarios took into account.

This subject is analyzed in accordance with FAA Order 1050.1F, Environmental Impacts: Policies and Procedures and Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions and described in detail within the EA/EAW document, in Section 5.11 and Appendix J. Based on the 2016 baseline and 2025 forecast operations counts identified in Appendix A, noise contours were developed for the no action and preferred alternatives to identify expected future aircraft noise impact areas, both with and without the proposed project.

The noise contours shown in the 2035 LTCP were developed using the FAA Integrated Noise Model (INM) computer software. As discussed in Appendix J, the FAA recently replaced the INM with the Aviation Environmental Design Tool (AEDT). As such, the FAA requires AEDT be used for any federal National Environmental Policy Act environmental reviews initiated after May 2015. According to the FAA, there is an overlap in functionality and underlying methodologies between AEDT and INM, however updates were made in AEDT which result in minor differences when comparing outputs from AEDT and INM.

Additionally, the base year and forecast scenario noise contours used different inputs in the LTCP than the EA/EAW. This is because the LTCP was conducted in 2015 and used 2012 as the base year with a 20-year forecast for 2035. The noise modeling completed as part of the EA/EAW used a more recent

base year of 2016 and a forecast of 2025 to evaluate approximately five years following the runway opening. The base year and forecast aircraft types and operations for the EA/EAW aircraft noise modeling were based on the operations estimates presented in Appendix A, and the detailed AEDT data inputs are included in Appendix J.

The following scenarios were evaluated in the EA/EAW using AEDT Version 2c:

1. Baseline 2016 – no project – existing conditions
2. No Action 2025 – no project – future conditions
3. Preferred Alternative 2025 – five years following approximate runway opening

AEDT is designed to, among other things, model noise exposure using the federally-required Day-Night Average Sound Level (DNL) metric, which is measured in decibels (dB). DNL has been formally adopted by most federal agencies dealing with noise exposure. In addition to the FAA, these agencies include the Environmental Protection Agency, Department of Defense, Department of Housing and Urban Development and the Veterans Administration. The use of AEDT and DNL is a national standard.

DNL is a cumulative noise metric that represents the average daily noise level, accounting for the added intrusiveness of noise at night compared to during the day. A nighttime penalty is added to flights occurring between 10:00pm and 7:00am by adding ten decibels to the sound exposure level of these operations to account for the increased sensitivity to noise during the night and because ambient sound levels are typically lower. Because of the logarithmic nature of decibels, this nighttime penalty is equivalent to saying these aircraft operations are being counted ten times.

AEDT requires a variety of user-supplied data, including physical airfield facilities, airfield altitude, terrain, atmospheric conditions (temperature, pressure, wind speed, dew point), aircraft activity, fleet mix, day-night split, runway use, and flight track use. Quantifying aircraft-specific characteristics in AEDT is accomplished through the use of a comprehensive noise database that has been developed under Federal Aviation Regulation Part 36. As part of the airworthiness certification process, aircraft manufacturers are required to subject aircraft to a battery of noise tests. Based upon the input data and the aircraft noise database, AEDT generates the noise contours by plotting points of the noise level events that represent the average-annual day. The points are then connected to graphically represent the noise contours that the aircraft generate. According to the FAA, the threshold of significance for aircraft noise is triggered if the preferred alternative reflecting the proposed airfield improvements would cause an increase of 1.5 dB DNL or greater for a noise sensitive (such as residential) land use at or above the 65 DNL noise contour when compared to the no action alternative. Under current FAA guidance, a residence is eligible for noise insulation under the federal Airport Improvement Program (AIP) if the residence is within the existing or forecast 65 dB DNL contour and has an interior noise level at or above 45 dB. As shown in the EA/EAW, the 65 DNL contour is contained entirely on Airport property in the baseline 2016 scenario. Similarly, under both the 2025 no action alternative and 2025 preferred alternatives, the 65 DNL contour will be contained entirely on Airport property. As a result, there will be no significant aircraft noise impacts under the no-action or preferred alternatives. Noise contours were developed for the 60 DNL for informational purposes only, as FAA does not consider the 60 DNL significant. The 60 DNL contour

extends west of Airport property in the baseline 2016 and no action 2025 scenarios, but it is contained entirely on Airport property in the preferred alternative 2025 scenario.

Appendix J includes a detailed description of the assumptions and inputs used to generate the noise contours, including aircraft fleet mix, runway usage, day/night split, and flight tracks.

In coordination with MAC staff, Mead & Hunt developed 2016 baseline and 2025 forecast aircraft operations counts for the no-action and preferred alternative scenarios. The methodology for estimating these counts is explained in Appendix A, *Runway Length Needs Documentation*, which categorizes the operations according to specific aircraft make/model to each operation under the 2016 baseline scenario (see Table 14 in Appendix A), based on data provided from the FAA Traffic Management System Counts (TFMSC) and the MAC Noise and Operations Monitoring System (MACNOMS). For the 2025 forecast scenarios, the 2016 baseline distribution of flight track use for each aircraft make/model were applied to the 2025 forecasts (see Table 15 for 2025 No-Action (Base Case) forecast (Appendix A, Page A-14), and Table 18 for 2025 Extended Runway Scenario forecast (Appendix A, Page A-16)) for their respective engine type category to derive operations counts by specific aircraft make/model for the 2025 No-Action and Alternative B, B1, and B2 scenarios.

Specific 2016 baseline runway use and flight track distributions were estimated for each engine type category based on MACNOMS flight track data for which the aircraft type was known. The flight track distributions for operations to and from each runway end are the same in all scenarios, and the runway use distributions are the same in both the 2016 baseline and 2025 no-action scenarios. However, the runway use distributions were modified for the 2025 “with project” scenarios to account for runway improvements associated with the proposed action.

Expected changes to runway use in the 2025 preferred alternative scenario include the following:

- Piston aircraft are expected to use Runway 04/22 more often once the runway is extended, runway edge lighting is installed, and non-precision instrument approach procedures are established. Approximately 25% of piston operations occur on Runway 04/22 in the 2016 baseline and 2025 no-action scenarios, whereas approximately 35% occur on Runway 04/22 in the 2025 “with project” scenarios.
- Turboprop and jet aircraft are expected to use the Runway 14 end more often once an approach procedure is established. Approximately 30% of turboprop arrivals and no jet arrivals occur on Runway 14 in the 2016 baseline and 2025 no-action scenarios, whereas approximately 45% of turboprop arrivals and 33% of jet arrivals occur on Runway 14 in the 2025 “with project” scenarios. In all scenarios, all multi-engine turboprop and jet aircraft operations are expected to occur on the primary runway.
- Approximately 4% of single-engine turboprop operations are expected to occur on Runway 04/22 in the 2025 “with project” scenarios, whereas there are no single-engine turboprop operations on this runway in the 2016 baseline and 2025 no-action scenarios.

The 2016 MACNOMS data indicate that approximately 4% of total operations at Lake Elmo Airport occur during nighttime hours. To estimate nighttime operations and apply the 10-dB nighttime noise sensitivity



penalty within the AEDT model, this percentage was applied to all operations for all aircraft makes/models in all scenarios.

MAC maintains a voluntary noise abatement plan at the Airport that prescribes preferred flight procedures, preferred runway use, designated maintenance run-up areas, and nighttime training procedures for minimizing aircraft noise exposure in noise-sensitive areas surrounding the Airport. To view the Noise Abatement Plan for Lake Elmo Airport, visit [www.macnoise.com/other-mac-airports/lake-elmo-airport-21d](http://www.macnoise.com/other-mac-airports/lake-elmo-airport-21d). The MAC has also installed “fly neighborly” signs around the Airport and provides resources such as pilot briefings and guides to educate Airport users about the importance of minimizing noise effects to Airport neighbors. In addition, the MAC encourages tenants at Lake Elmo Airport to follow the voluntary Noise Abatement Plan for the Airport and takes its responsibility to respond to community concerns seriously. The MAC plans to establish an airport advisory commission to address future concerns about noise and noise abatement at the Airport. In addition, the MAC will update the existing voluntary noise abatement plan and hold educational briefings for pilots to help reduce noise. MAC also manages a website and operates a noise complaint and information hotline for all its airports. For information about noise programs, view airport operations, or file noise complaints, please visit [www.macnoise.com](http://www.macnoise.com).

However, there are many circumstances when noise impacts from the Airport cannot be abated. Federal grant provisions require that the Airport be operated in a manner that does not discriminate on the basis of type or class of aircraft or aviation activity and does not restrict or place an undue burden on interstate commerce. As a “public-use” airport, Lake Elmo Airport is subject to federal regulations. A congressional act passed in 1990 (the Airport Noise and Capacity Act) limits the ability of airport operators to impose access or use restrictions based on aircraft noise. As a result, airport operators cannot restrict aircraft operations at an airport (such as closing the airport to jets or closing it at night) to control noise. Today, any U.S. airport that employs access or use restrictions designed for noise control had them in place prior to the 1990 act and were grandfathered in by Congress.

#### **E. Airfield lighting and fencing**

Various comments focused on lighting impacts of new lighting and relocated lighting for Runway 14/32. These impacts are explored in detail in the EA/EAW document in Section 5.13. The preferred alternative will relocate and extend existing medium intensity runway edge lighting (MIRL) systems, precision approach path indicator (PAPI) lights, and runway end identifier lights (REIL) associated with Runway 14/32 and installation of MIRL, PAPI, and REIL systems on Runway 04/22. Runway and taxiway edge lights define the edge of usable pavement; PAPI lights provide vertical glideslope information to pilots on approach to a runway; and REIL provide positive identification of the runway end at night and in inclement weather. Runway and taxiway edge lights and PAPI lights are continuously burning lights, while REIL are synchronized flashing lights. Runway and taxiway edge lights are omnidirectional (emit light in all directions), while PAPI and REIL are aimed into the approach area beyond the end of the runway. PAPI lights are aimed upward and outward along the extended runway centerline, while the REILs are aimed upward and at 15-degree lateral angles from the extended centerline.

The preferred alternative would move the Runway 14/32 MIRL, PAPI, and REIL systems closer to residential areas southeast of the Airport. The new MIRL, PAPI, and REIL systems on either end of Runway 04/22 would be a similar distance from residences northeast and southwest of the Airport. These residential areas are currently shielded from Airport light emissions because they are more than a half mile from the existing runway ends, with mature trees in between. The distance from the Runway 32 end to the Airport property line, when measured along the extended runway centerline, would be reduced from approximately 2,400 feet to 1,900 feet under the preferred alternative. The distance from the Runway 22 end to the Airport property line would be reduced from 2,250 feet to 2,000 feet.

The MAC recognizes that tree removal associated with the project will eliminate an existing visual screen between the runways and residential areas southeast and northeast of the Airport and will carefully consider individual trees to only remove those needed to comply with FAA criteria. However, lighting impacts from the MIRL and PAPI will likely be minimal given their location and steady illumination. Impacts from REIL systems, which are directional strobing lights, can sometimes be mitigated by adding baffles to reduce visible glare and installing solid fence in the runway approaches to block additional light not captured by the baffles. Lighting systems at the Airport can be remotely activated by pilots via radio, so the systems need be only in full effect when in use by approaching and departing aircraft. Under both the no-action and preferred alternatives, the runway and taxiway edge lights would be preset to low intensity and would only increase in intensity when in use, while the REILs and PAPIs would not be illuminated at all when not in use. Based on frequency of IFR conditions and nighttime operations at the Airport, less than 15 percent of aircraft operations (approximately 4,000 annual operations or less) are expected to occur during nighttime or in inclement weather conditions. Unnecessary light can be further reduced by illuminating the REIL systems only when the pilots activate the highest intensity setting. As high intensity lighting at night can be disorienting for pilots, the high-intensity setting is typically used by pilots only to aid in initially locating an airport. After the pilot has positively identified the Airport, it is common to reduce the lighting intensity to complete the approach and landing.

The preferred alternative also includes installation of obstruction lighting on top of approximately a dozen on-Airport structures that would penetrate the departure threshold siting surfaces beyond the Runway 04, 14, and 22 ends. These would be steady-burning red lights to increase conspicuity from the air during nighttime. Given their performance characteristics and distance from light-sensitive receptors, these lights are not expected to create annoyance or interfere with normal activities.

Based on the information above, there are no significant visual effects associated with the preferred alternative or no-action alternative. Options for reducing light emissions exposure to be considered during project design include light baffles around REILs, solid fencing in runway approaches, and implementing low, medium, and high intensity light settings to reduce the frequency of high intensity light emissions. These measures will help reduce the effects of lighting changes for the community. Some commenters had concerns about the aesthetics of the proposed fence. The MAC will consider aesthetic characteristics of fencing options during project design.

## **F. Zoning and incompatible land use**

This section includes responses to comments concerning land uses and zoning near the Airport. Common topics included concerns about birds strikes related to certain nearby land uses, questions and concerns about residential uses and pre-existing city and township districts near the Airport, questions about the lack of current safety zoning, and comments about the recent development near Airport property.

### **i. Concerns about bird strikes due to incompatible land use**

A few comments focused upon wildlife hazards stemming from land uses around the Airport such as woodlands, agricultural land, stormwater detention, and wetlands. Commenters recalled news stories about aircraft bird strikes and expressed concerns about safety for Airport users and the nearby community if something similar were to occur near Lake Elmo Airport. Airports often make plans to avoid and minimize hazards arising from wildlife attractants nearby, and this subject was analyzed in the EA/EAW in Section 5.9.4.

A site visit was conducted by a certified wildlife biologist from Mead & Hunt in October 2017 to observe and characterize wildlife attractants at and surrounding the Airport. A report regarding the findings of this visit is in Appendix I. This report indicates that the proposed project would not result in any new hazardous wildlife concerns at the Airport. The MAC provided the report to the local USDA Animal and Plant Health Inspection Services (APHIS) Wildlife Services (WS) division office on November 8, 2017. In a letter dated January 3, 2018, a wildlife biologist at USDA found that “the proposed changes to the existing airport layout are unlikely to increase the wildlife hazards present at 21D” and “would have little effect on current hazardous wildlife use of the airport and surrounding area.” This letter is also included in Appendix I to the EA/EAW.

Wildlife observed in October 2017 included the American crow (4), eastern wood-pewee (12), Canada goose (400+) continuous morning flights traveling south to north, blue jay (5) and approximately 300 redwinged blackbirds. Additional wildlife observed at the Airport include fox, coyote, deer, 13-lined ground squirrel (numerous), gopher, red-tailed hawk, crow, killdeer, rock pigeon, and starlings.

Attractants on the Airport include agricultural land and wetlands. Approximately 300 acres of the Airport are leased for farming with soybean and/or corn planted on a rotating basis. Grass/alfalfa hay is also harvested onsite in areas not planted with corn or soybeans. During wet periods of the year, the wetlands located onsite support ducks, shorebirds, passerines and other wildlife dependent on wetland habitats. Other attractants near the Airport include the fairgrounds to the north, which attracts Canada geese. Most deer are observed during the daylight hours and tend to congregate north and northeast of the Aircraft Operations Area (AOA) near trees. No golf courses, wastewater treatment facilities, landfills or waste transfer stations are within one mile of the Airport.

The Airport maintenance staff person indicates that deer have been observed on the Airport, and that Canada geese are increasing in numbers because of suburban development near the Airport, which includes a new stormwater detention pond and open space.



The proposed action will move Runway 14/32 further away from the stormwater retention pond located west of Manning Avenue, which will be an improvement from a wildlife hazard perspective. As a matter of practice, the MAC does not advocate the construction of open-water retention ponds in close proximity to its airports because of their potential to attract and/or sustain hazardous wildlife populations. For example, although it did not support construction of the open-water retention pond west of Manning Avenue, the MAC reviewed plans for Easton Village, consulted with the USDA-APHIS Wildlife Biologist, and provided recommendations concerning the design of storm water retention and infiltration areas that would minimize wildlife hazards to the extent practicable. The developer updated the landscape plan in response to these comments. The MAC routinely reviews and comments on off-airport development proposals near the airport to assist with landscaping design that reduces wildlife attractants. However, the MAC cannot require off-site entities to limit wildlife attractants.

Most recent wildlife strikes during the maintenance staff person's tenure at the Airport have been sparrows (seed eaters) and barn swallows (insect eaters) that nest in or near the hangars. Strike data recorded over the most recent seven-year period indicate at least two or three strike events have included multiple birds per strike, the other strikes recorded indicate that single birds were struck. No more than six strikes have occurred during the tenure of the current Airport maintenance staff person.

The expansion of the airfield and associated hardscapes and safety areas will reduce habitat for birds and wildlife at the Airport. However, the dislocated deer will continue to congregate near the remaining areas with trees. Agricultural row crops will be reduced by approximately 70 acres, which will reduce potential for bird strikes (sparrows and swallows) near hardscapes and associated safety areas. The proposed project will not reduce Canada goose strike potential other than reducing risk by eliminating existing agricultural crops.

#### **ii. Concerns about incompatibility with city and township residential districts**

Many community members expressed concerns about planned safety zoning around the Airport, and whether the proposed airfield configuration is incompatible with the surrounding residential land use. The comments centered on the Minnesota model ordinance safety zones, which provide guidance but have not been enacted around Lake Elmo Airport. Residents were concerned about whether the Airport would be zoned in the future, what is allowed in each zone, and the hazards associated with residences located in these zones.

The EA/EAW describes land use impacts in Chapter 5, Section 5.9.1. The preferred alternative would move the Runway 14 threshold approximately 750 feet east-northeast and move the Runway 32 threshold approximately 1,200 feet east-southeast. Visual flight rules (VFR) traffic pattern airspace at the Airport would extend 1.5 nautical miles (9,114 feet) laterally and longitudinally from the runway endpoints under both the no-action and preferred alternatives. Because the preferred alternative would not substantially alter the VFR traffic pattern airspace, impacts to surrounding land uses are minimal.

Effects to existing and planned neighboring land uses were identified in Chapter 3, *Alternatives*, for the no-action and preferred alternative using the Model State Safety Zones A and B promulgated under

Minnesota Administrative Rules 8800.2400 as a guide. Safety Zone A typically prevents erection of new structures, and Safety Zone B typically prevents small lot residential development using density standards. This analysis determined that, under the no action alternative, there are no houses in Model Safety Zone A and two houses in Model Safety Zone B for Runway 14/32, and no houses in Model Safety Zone A and eight houses in Model Safety Zone B for Runway 04/22. For the preferred alternative, there would be three houses in Model Safety Zone A and ten houses in Model Safety Zone B for Runway 14/32, and two houses in Model Safety Zone A and ten houses in Model Safety Zone B for Runway 04/22. The Model Safety Zones for both the no-action and preferred alternatives are shown and analyzed further in Chapter 3, *Alternatives*.

MAC has not initiated the zoning process in recent years due to the need for an approved development plan for the airfield enabling zoning to be consistent in guiding development in the surrounding areas. Before completing the EA/EAW process, the MAC will start convening a Joint Airport Zoning Board (JAZB) under Minnesota Statutes Chapter 360. Members of the JAZB are expected to include representatives from the City of Lake Elmo, Baytown Township, West Lakeland Township, Washington County, and any other local government jurisdiction affected by the proposed zoning ordinance. The process will consider public input as part of developing an airport zoning ordinance. This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state's Model Zoning Ordinance. This deviation from the model would allow the zoning ordinance to be tailored for the specific community needs.

Current development in Model Safety Zone B for the proposed airfield configuration is not vastly inconsistent with the density standards set by the model ordinance. Model Safety Zone B allows buildings on lots of 3 acres or more, with a population of no more than 15 people per acre. In Baytown Township, the proposed safety zone falls into the Single Family Estate District, which allows 16 dwelling units per 40 acres. In West Lakeland Township proposed safety zones fall within a similar Single Family Estate District where the density of residential dwelling units shall not exceed 16 dwelling units per 40 acres or quarter section with a minimum lot size of 2.5 acres. Referencing the Lake Elmo 2040 future land use plan, most of proposed Safety Zone B within city limits is in the future Rural Area Development zone, which allows one dwelling per ten acres. A small corner of the Safety Zone B is within a future Village-Medium Density Residential district that permits 3-8 dwellings per acre, but this area is currently zoned Rural Development Transitional (RT).

The City of Lake Elmo is considering the Airport, its RPZs, and its potential safety zones in plans for future development. According to the City of Lake Elmo 2040 Draft Comprehensive Plan, "Parts of the airport safety zone and noise impact areas impact a portion of the Village Planning Area in Lake Elmo. A new low density single-family detached residential neighborhood is partially developed with subsequent phases anticipated within this planning period. No development is allowed within the Runway Protection Zone (RPZ). All land designated within the RPZ are designated as Public/Semi-Public uses and are included within the City's Greenway Overlay which restrict any future development of land within this designation. The Future Land Use is consistent with allowed land uses within the safety zones for the Lake Elmo Airport and reflects this restriction. The City will continue to work with the Metropolitan Airports

Commission and MnDOT Aeronautics Division to update airport zoning regulations that address noise and safety concerns within these zones as required.”

**iii. Why isn't the Airport zoned now?**

As of January 1, 2017, Washington County no longer exercises land use authority in West Lakeland Township except for administration of ordinances affecting shoreland management, mining, floodplains, subsurface sewage treatment systems, and Lower St. Croix River bluffland and shoreland. West Lakeland Township has adopted the Washington County Development Code or a version similar to the document. The Washington County zoning ordinance includes an Airport Overlay District applying to both public and private land. The regulations of the Airport Overlay District are in addition to regulations enforced by other districts covering the same land and are designed to minimize land development adjacent to and near the airfield. The Airport Overlay District consists of two zones: Qualified Land Use Zone and Airport Zone. The Qualified Land Use Zone prohibits structures or uses that will cause assembly of persons, manufacturing or storage of materials which will explode on contact, or the storage of flammable liquid above ground. The zone does permit primary uses, uses permitted with a certificate of compliance, accessory uses and uses permitted with a conditional use permit from underlying zoning districts. However, the Qualified Land Use Zone prohibits educational, institutional, amusement, and recreational uses as well as any use that would result in electrical interference with radio communications, airport light interference, or impaired visibility. The Airport Zone prohibits growth, construction, maintenance, or alteration of trees and structures above the Part 77 imaginary surfaces (horizontal, conical, primary, approach, and primary).

**iv. Neighborhoods already moved into future safety zones/encroaching on Airport**

Some community members pointed out that the conditions around the Airport have changed since the Airport was established in 1951. Residences have been built in some of the proposed safety zones, and development is encroaching upon the Airport. Neighbors questioned why the MAC did not prevent this from happening if the proposed development was still being considered. Chapter 4, Section 4.8 of the EA/EAW discusses the history of development around the Airport. MAC routinely reviews and comments on local development proposals with respect to compatibility with Airport operations but does not have the ability to prevent development from occurring outside of Airport property. These reviews often result in MAC recommendations that impacts associated with its airports and associated future plans be acknowledged by developers and future homeowners, but MAC cannot force the local development permitting authority to include such requirements in their building permits.

**v. Safety risks**

Several commenters expressed concern about potential airplane accidents near the Airport and resulting fears about their own personal safety. A few of these commenters noted that pilots should not use the runway if they think it is unsafe. As noted in Section 2.1 of the EA/EAW, one of the primary infrastructure goals for the project is to enhance safety for Airport users and neighbors. The project will achieve these goals not only by extending the runway, but also by providing a primary runway that is more centrally located on MAC-owned property. On balance, the project will result in the primary runway ends being further from off-Airport land uses that pose safety risks, including roads, railroads, and private properties. The airport zoning process will include further evaluation of safety risks associated with Airport operations



and their relationship to off-Airport land uses, and the resulting ordinance will prescribe measures for minimizing these risks.

### **G. Community compatibility and neighborhood character**

Several commenters expressed concern about the compatibility of the proposed project with the surrounding community. This included concerns about how the Airport fits with the character of the nearby residential neighborhoods where residents chose to live due to the quiet atmosphere and the rural quality of the area, which is relatively free from the lights and noise of more urban areas. Some commenters expressed dismay at the prospect of the Airport overtaking or ruining their neighborhood and disrupting settled communities. Others noted that the proposed project is not aligned with the wishes of the township regarding community character.

The Airport has co-existed with its neighboring communities since its initial establishment in 1951, and the proposed project was specifically designed to minimize impacts to Airport neighbors to the extent practicable. As noted previously, the proposed action contemplated by the EA/EAW is not expected to change the role of the Airport or the family of aircraft it serves. The purpose of the runway extension is to increase the margin of safety for and accommodate the needs of aircraft operating at the Airport today. The project is expected to result in a slight increase (1% to 2%) in takeoffs and landings. This increase is expected to occur solely among the design aircraft for each runway, which would be able to operate in a wider variety of scenarios. Overall character of aircraft operations at Lake Elmo Airport are expected to remain the same.

The project will occur entirely on MAC-owned property and will not require any new land acquisition. The MAC purchased land in the late 1960s and early 1970s to facilitate the airfield improvements being proposed. No additional land acquisition is planned as part of the proposed action.

The proposed improvements are intended to serve the Airport for the foreseeable future. After the 3,500-foot length is constructed, the primary runway will be fully built out in terms of RPZ compliance, with no further extensions contemplated during the 20-year planning horizon. This will give the surrounding municipalities assurance of the Airport's future footprint for comprehensive community planning.

Input from the community is a factor that has been considered throughout this process. The MAC also needs to consider safety, operational improvements, conformance to its legislative mandate and FAA policy. The Lake Elmo 2015 LTCP Update identified deficiencies that need to be addressed. Our record during both the planning effort and the environmental review shows specific actions that incorporate community input/concerns into the design alternatives.

### **H. The plan is outdated**

Many community members pointed out that the proposed project was based upon a plan for Lake Elmo Airport that was originally envisioned in the 1960s. This led to concerns that the proposed projects were no longer up-to-date with the needs of the Airport or the surrounding community. However, planning at the Airport has been ongoing. Multiple more recent documents, including the current LTCP, have updated

this vision to adapt to current conditions and Airport needs. Stakeholder engagement efforts over the LTCP and EA/EAW processes worked to account for current community needs.

Based on the previous planning efforts, the MAC purchased land in the late 1960s and early 1970s to facilitate the airfield improvements being proposed. Although scaled back in terms of runway length and the number of runways, the plan that was proposed in the current LTCP and the EA/EAW remains consistent with the vision offered in previous plans, which have included a longer primary runway and the realignment of a section of 30th Street North. The fact that the current plan is similar to the legacy plans bears testament to the validity of the original vision expressed many years ago. The vision for the future of Lake Elmo Airport has been consistently articulated over the years to guide communities and adjacent landowners in making decisions about how to develop their properties and homes.

### **I. Public involvement was inadequate**

Comment responses in this section are related to the public involvement efforts undertaken during the EA/EAW process. Common comments related to the MAC's responsiveness to community input, the perception of representation or accountability throughout the process, and concerns about communication about the project and EA/EAW process.

#### **i. Concerns about responsiveness to community input**

Many comments expressed concerns about the community engagement process, and how the MAC responded to or incorporated community feedback into the planning and environmental processes. Several comments noted that while there were many public meetings, it appeared that the actions were already decided before consulting with the community, and that the MAC was not responding to or addressing public concerns.

The MAC addressed public comments during the EA/EAW process in several ways.

- Comments were addressed by updating the FAQs on the project website.
- Comments received prior to release of the Draft EA/EAW were considered in development of the document.
- Comments were answered verbally as part of a question and answer session in a public meeting.
- Comments received during the public comment period after release of the Draft EA/EAW were responded to and considered during its finalization.

In addition to these channels for comment responses, the MAC has been considering public input over several years as the actions evaluated in the EA/EAW took shape.

Prior to initiating the environmental review process, the MAC conducted a LTCP process that included robust public outreach. Initial stakeholder outreach efforts for the LTCP involved meetings with partner agencies, municipal representatives, and Airport tenants before the Draft LTCP was completed. These meetings provided information regarding the plan's purpose, process, preliminary findings, and timeline. The next phase of stakeholder outreach consisted of the formal public review period after the Draft LTCP was completed and the MAC Board approved it for distribution. A Draft LTCP was issued for public review

and comment on June 22, 2015. Two public information meetings were held in July 2015 to provide information regarding the Draft LTCP to interested citizens. This initial public comment period closed on September 16, 2015, after being extended to provide additional time for community input. In response to community input received during the initial formal LTCP public comment period, MAC staff developed a refined preferred alternative (Alternative B1) which included shortening the proposed length of Runway 14/32 from 3,600 to 3,500 feet and a different realignment concept for 30th Street North, as described in Chapter 3 of the EA/EAW. An Addendum to the Draft LTCP was prepared to describe the features of and rationale behind the development of the refined preferred alternative. Public review and comment on the Addendum opened on January 25, 2016. A supplemental public information meeting was held on February 11, 2016, to provide additional information about the refined development concept to interested citizens. The public comment period on the Addendum closed on March 9, 2016.

The MAC made notable changes to the Draft LTCP based on community concerns and feedback. Initially, the MAC began with an examination of the 2008 plan, which recommended an initial 3,200-foot primary runway, with an ultimate extension to 3,900 feet after 2025, and a 3,200-foot crosswind runway. It was determined that a 3,900-foot runway is not necessary to achieve the objectives of the plan and did not fit with a viable 30<sup>th</sup> Street North realignment option, considering the Federal Aviation Administration's new guidance on Runway Protection Zones. Therefore, the plan was updated with a more modest primary runway extension to 3,600 feet and the crosswind runway to 2,750 feet. These lengths are based on FAA guidance and manufacturers' performance charts for several aircraft using Lake Elmo Airport.

Through the LTCP process, the MAC made a commitment to consider the concerns voiced by neighbors and evaluate if any adjustments to the proposed plan might be feasible to address some items of concern while preserving the desired objectives for improving the Airport's facilities. In the spirit of this commitment, the LTCP was further refined with a new preferred alternative to cut 100 feet off the primary runway extension, based on input from the neighbors and contrary to input received from the Airport user community. At 3,500 feet, staff believes the primary runway will sufficiently serve the aircraft types operating at the Airport today—but with a higher margin of safety.

This shorter runway length also allows 30th Street North to tie in with the existing four-way intersection at Neal Avenue North and eliminates the need for a new intersection—a point of concern for the community. Additional 30th Street North concepts were a main focus during this environmental review as the team set out to address the primary concerns expressed by the Community Engagement Panel: travel time and safety. See response to comment theme B(i) above.

Because the MAC values its relationship with the community, it created a Stakeholder Engagement Plan for the environmental review process that has provided additional opportunities for all stakeholders to participate and be heard. The Stakeholder Engagement Plan is available to view on the project website ([www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx)).

#### **ii. Concerns about representation and/or accountability**

Comments comprising this theme questioned whether the Airport's needs were more important than the communities' needs when the communities are represented by elected officials and the MAC is



comprised of unelected officials. Comments expressed concern that the MAC's decisions will negatively affect the lives of citizens living near the Airport. Comments within this theme also stated the MAC has a responsibility to the community to preserve water resources and the neighborhood.

The Metropolitan Airports Commission (MAC) is a public corporation created by the Minnesota Legislature in 1943. The MAC owns and operates seven airports within 35 miles of downtown Minneapolis and St. Paul. This includes Minneapolis-St. Paul International Airport and six general aviation airports. The MAC board has 14 members, 12 of whom are appointed by the Minnesota Governor. The remaining two are appointed each by the mayors of Minneapolis and St. Paul. While they are not elected officials, they are bound by their legislative mandate according to Minnesota Statute 473.602 and provided below:

(1) promote the public welfare and national security; serve public interest, convenience, and necessity; promote air navigation and transportation, international, national, state, and local, in and through this state; promote the efficient, safe, and economical handling of air commerce; assure the inclusion of this state in national and international programs of air transportation; and to those ends to develop the full potentialities of the metropolitan area in this state as an aviation center, and to correlate that area with all aviation facilities in the entire state so as to provide for the most economical and effective use of aeronautic facilities and services in that area;

(2) assure the residents of the metropolitan area of the minimum environmental impact from air navigation and transportation, and to that end provide for noise abatement, control of airport area land use, and other protective measures; and

(3) promote the overall goals of the state's environmental policies and minimize the public's exposure to noise and safety hazards around airports.

By its constitution and legislative mandate, the MAC has obligations and accountability to a variety of stakeholders, including residents in the communities surrounding MAC airports as well as MAC tenants and Airport users. That doesn't mean the MAC can guarantee that all stakeholders will be completely satisfied at the end of the process. The MAC needs to simultaneously consider the needs of Airport users, the concerns of Airport neighbors and the requirements of the MAC's legislative mandate. The MAC strives to be a good airport neighbor and has a record of going above and beyond the required efforts to engage with the public, educate the public on proposed plans, listen to and respond to concerns, and address those concerns within proposed plans, where possible.

The MAC's statutory obligation includes maintaining adequate infrastructure for air transportation in the metropolitan area to promote the efficient, safe, and economical handling of air commerce. This means that MAC must pursue necessary or pressing airport improvements in order to maintain its commitment to the purpose for which the legislature formed it.

It is accurate that the MAC is responsible for preserving water resources on and surrounding the Airport. Under Minnesota Statutes 473.602, the MAC is invested with a legislative mandate to "assure the

residents of the metropolitan area of the minimum environmental impact from air navigation and transportation, and to that end provide noise abatement, control of airport area land use, and other protective measures", and to "promote the overall goals of the state's environmental policies and minimize the public's exposure to noise and safety hazards around airports." The MAC will comply with all applicable rules and regulations relative to water and other environmental resources. Affected water resources and their relationship to the proposed action are discussed in Section 4.5 and 5.14 of the EA/EAW document. Based on analysis in the EA/EAW, there are no significant impacts to water resources, or any other environmental resource category, associated with the preferred alternative or no-action alternative.

### iii. Concerns about communication about the project

Some comments supporting the project expressed concern over the misinformation being spread by those opposed to the project, and requested that MAC stop calling it an expansion, as they view it as a redevelopment within the MAC's property lines. Some comments opposing the project cited not being informed of the Airport's development plans when they bought or built their homes, and also expressed concern as to the truthfulness, accuracy and respectfulness, or lack thereof, of communications and comments made by MAC representatives to the community.

The MAC comments on proposed developments in areas surrounding its airports, including near the Lake Elmo Airport. Through these comments, the MAC has encouraged the City of Lake Elmo to include existing and planned Airport information in their disclosures to potential buyers. The MAC also discourages land uses surrounding the Airport that are incompatible with airport operations; however, the MAC does not have authority to ensure their comments are acted upon when it comes to land outside of the MAC's Airport property. The MAC was successful, however, in getting the City of Lake Elmo to include a disclosure statement for the recent Easton Village residential development.

The Declaration of Easements, Covenants, Conditions and Restrictions for Easton Village, dated July 23, 2015 includes, under Section 9, *Disclosures Required by City of Lake Elmo*. The first subsection reads as follows:

- (a) *Lake Elmo Airport*. The property is located near the Lake Elmo Airport, a public use airport owned and operated by the Metropolitan Airports Commission. The Airport is open 24 hours a day, year-round. The Airport operates with a primary runway on a northwest/southeast orientation and a perpendicular crosswind runway on a northeast/southwest configuration. The primary role of the Lake Elmo Airport is to accommodate personal, recreational and some business aviation users within Washington County and the eastern portion of the Twin Cities Metropolitan Area. The Airport accommodates aircraft operations from single and multi-engine propeller-driven aircraft; occasional corporate jet aircraft; helicopters; and pilot training facilities; all of which may affect the Property with overflights and aircraft noise during the day and at night. The Airport operates lighting which may be visible from the Property.

The LTCP for the Lake Elmo Airport contemplates constructing a longer primary runway parallel to but shifted north and east of the existing northwest/southeast runway alignment and an

extension to the crosswind runway. The proposed expansion is intended to improve the Airport's ability to fulfill its existing role and to compete more effectively for additional business-related flights that use propeller-driven aircraft.

Further information regarding the Lake Elmo Airport can be obtained from Metropolitan Airport Commission's Airport Manager, Telephone No.: 651-224-4306.

The MAC has increased its focus on enhanced stakeholder engagement in airport planning and environmental review processes. The MAC's Lake Elmo Airport collaboration/stakeholder engagement process is the most comprehensive strategy developed and executed to-date as part of LTCP and environmental review activities.

The EA/EAW Stakeholder Engagement Plan (SEP) included:

- Community Engagement Panel (CEP) was central component – 6 meetings held
- Public meetings – 4 held through the process
- Project website – includes extensive FAQ page with responses to over 40 common concerns/questions
- Project newsletter – 4 published through the process
- E-news subscription list
- Public notifications

The MAC and its consultants endeavor to identify and present the best and most accurate information available during the environmental review process. Objectives of the SEP include proactively identifying areas of concern for the community and building stakeholder trust and support. The MAC strives to involve surrounding communities in a respectful, considerate, and truthful manner.

#### **J. Justification for the project**

This section includes comment responses regarding the justification, or Purpose and Need, for the project, as stated in the EA/EAW document. Common themes within this category include the concern that the project is unnecessary or lacks benefit for the community, a perception that the true purpose of the project is to secure federal funding for the Airport, and concern that there is no public need for the project due to the Airport's use by recreational users.

##### **i. Concerns that the project is unnecessary for the Airport and lacks benefit for the community.**

Several commenters were concerned that the proposed project is unnecessary for the Airport and lacks benefit for the broader community. Some comments took issue with the stated purpose and need for the project within the EA/EAW document, saying that it was not reflective of the wider community needs, or that the needs were not true needs, but rather wants of the Airport users and the MAC. For this reason, some commenters suggested that the project was an unnecessary or irresponsible use of public funds.

According to the Minnesota Department of Transportation (MnDOT), Lake Elmo Airport is one of 83 intermediate airports in the state, which have paved and lighted runway of less than 5,000 feet and can

accommodate all single engine aircraft as well as some multi-engine aircraft and some business jets. Of those airports, Lake Elmo is the fourth busiest and ranks second for the number of aircraft that call it home. Even with these high operational rankings among its peer airports in the state, the existing primary runway length puts it in 79<sup>th</sup> place.

As noted in Chapter 2 of the EA/EAW, the MAC recently completed and adopted an LTCP for Lake Elmo Airport. The plan evaluated facility needs over the next 20 years and serves as a “road map” to guide future Airport development. The purpose and need arose from the facility needs and issues identified in the LTCP process and considered the needs of both Airport users and the surrounding community.

The recommended development plan will prioritize safety and security requirements, followed by user needs. After the 3,500-foot length is constructed, the primary runway will be fully built out in terms of Runway Protection Zone (RPZ) compliance, with no further extensions contemplated during the 20-year planning horizon. This will give the surrounding municipalities assurance of the Airport’s future footprint for comprehensive community planning. It optimizes the use of existing Airport property, including that purchased in the late 1960s and 1970s for the relocation of 30th Street North. No additional property acquisition is required. It accommodates the future expansion needs of County State Aid Highway 15/Manning Avenue in its current alignment. Urban development is expected to increase west of Lake Elmo Airport and adjacent to this portion of Manning which will need to be expanded in the next decade to accommodate current and expected future traffic. It allows the development program to advance more efficiently without the time needed to complete an RPZ Alternatives Analysis. It minimizes operational disruptions during construction as the replacement Runway 14-32 can be constructed with the existing Runway 14-32 in operation. It is consistent with the long-term vision for the Airport, which has included a relocated and longer primary runway for decades.

The purpose of the proposed action at Lake Elmo Airport is to pursue the following three general infrastructure goals:

- 1) Address failing, end-of-life infrastructure;
- 2) Enhance safety for Airport users and neighbors; and
- 3) Improve facilities for the family of aircraft using the Airport.

The proposed action will address these deficiencies by achieving the project goals and the following four supporting objectives:

- 1) Improve the runway and taxiway pavement condition;
- 2) Minimize incompatible land uses in the RPZs;
- 3) Meet runway length needs for users; and
- 4) Upgrade the instrument approach procedures.

Several factors make it necessary to consider these improvements at this time.

- 1) The existing runway pavement is at the end of its useful life and needs to be reconstructed in the near future. Simply repairing the surface of the runways will be ineffective in the future because the subgrade – the foundation of the pavement – needs reconstruction. Reconstruction will need to occur soon, and considering other facility needs at the same time



will help minimize potential impacts from repeat construction disturbance. In addition, the estimated cost for reconstructing the existing airfield is \$5.4 million. Investing these funds in a long-term solution that includes a realigned and extended runway more adequately addresses existing issues. Having a long-term solution in place will also allow the adoption of safety zoning to maintain compatibility with the community as it develops.

- 2) The FAA's policy to minimize incompatible land uses within RPZs is a major driver for relocating the runway. By moving these zones completely within the Airport's boundaries, MAC can keep them clear of incompatible land uses. Doing this also provides certainty for the surrounding communities and jurisdictions while they engage in their own future planning processes, and minimizes risk associated with incompatible land uses within the RPZ.
- 3) Chapter 3 Section 3.2.1 in the EA/EAW also explained that the current runway length does not meet the needs of Airport users.

The improvements, while contained on Airport property, benefit Airport users as well as the broader community in several ways, such as:

- Economic activity generated by overnighting pilots and visitors accessing the region via Lake Elmo Airport.
- Economic activity generated by tenants and users who purchase goods and services at the local hardware stores, grocery stores, banks, auto repair and service shops, barbers, and restaurants.
- Airport tenants pay property taxes on their hangars based on taxable market value. For 2014, total property taxes billed equaled approximately \$105,000. Of these tax revenues, 42% went to the Stillwater School District (ISD 834), 40% went to Washington County, 12% went to Baytown Township and the remaining 6% was split among the Valley Branch Watershed District, Met Council, Metro Transit, and Metro Mosquito Control.
- Expenditures for annual operations and maintenance activities.
- Expenditures for capital improvements, such as pavement rehabilitation.
- Employment provided by the Fixed Base Operator (Valters Aviation).
- Portions of the Airport are farmed, as well, providing revenue-generating opportunities for a tenant farmer.

Additionally, tenants participate in community-focused activities, such as:

- The Experimental Aircraft Association (EAA) Chapter 54, based at Lake Elmo Airport, has more than 100 members and participates in the EAA Young Eagles program to introduce young people to aviation; hosts an annual aviation day; actively supports programs at the Farnsworth Aerospace magnet school in St. Paul; and conducts an annual ground school to teach aviation rules, regulations, and safe flight practices.
- The local Civil Air Patrol squadron is trained to assist in search and rescue, disaster relief, and humanitarian activities, while providing aviation education and training for young people.
- Local pilots participate in the Angel Flight program, which provides free air transportation via volunteer pilots for financially distressed children and adults with medical and humanitarian needs.
- Local pilots participate in the Pilots-N-Paws program, which facilitates transportation of rescued, sheltered, or foster animals.

**ii. Concerns that the project is only to receive federal funds**

Multiple commenters perceived an underlying motivation for the proposed project that was different from the stated purpose and need. These commenters surmised that the MAC was pursuing the project simply to secure federal funding for repaving the primary runway, and that this would not be possible without increasing its size. The MAC is not pursuing the project to secure federal funding for repaving the runway, but for the reasons stated in Chapter 2, *Purpose and Need*. Some commenters assumed that the current operations at Lake Elmo wouldn't qualify for federal funding alone, and that lengthening the runway would allow the Airport to increase operations to a level that would qualify. Comments suggested that this means that the MAC is pursuing a project that is unnecessary for the users at Lake Elmo Airport. The project is not contingent on an increase in aircraft operations and is based on the needs of existing Airport users.

Therefore, these comments are not accurate. The project is being proposed for the reasons stated in Chapter 2, *Purpose and Need*, and for no other reason.

**iii. Purpose of the project is only to support an expensive hobby**

A few commenters had a concern that the Airport, and consequently the proposed project, only exists to support the hobby of a few people. Their concerns consisted of the expense of the project, the use of public money for a private individual hobby rather than public benefit, and that the larger community should not be inconvenienced by the negative impacts of the Airport or a project that benefits discretionary users that could seek other options for recreational pursuits.

As noted previously, Lake Elmo Airport hosts personal, recreational, and some business activity by various based and transient aircraft operators. In fact, approximately 24 percent of aircraft based at Lake Elmo Airport are registered to corporations according to the FAA's aircraft registration database. The Airport primarily supports general aviation (GA) and air taxi operators. GA represents all civil aviation activity not defined as commercial and includes a variety of users and activities, including corporate and business operators, recreational users, flight training, agricultural applications, law enforcement, and other government uses. Air taxi represents for-hire, on-demand commercial activity that is conducted on an unscheduled basis.

**iv. Project is not needed due to declining GA use in the metropolitan airports system**

Multiple members of the public pointed to the declining GA use at the Airport and within the metropolitan airports system as a reason that the Lake Elmo Airport improvements are not necessary. These statistics were described in a recent article in the Pioneer Press, which many of the comments referenced. Commenters also brought up the upcoming requirement that aircraft be equipped with ADS-B transponders, which may lead to further declines to the use of recreational aircraft or operations for personal transportation.

The proposed project at Lake Elmo Airport is based on the needs of current users. These needs are not dependent on a specific number of aircraft operations and would exist regardless of how many operations occur at Airport. Although general aviation activity has been declining nationwide since 2000, GA

operations have stabilized at Lake Elmo Airport over the last few years between 20,000 and 30,000 operations. The recent LTCP and the FAA Terminal Area Forecast both project future operations at Lake Elmo Airport remaining at a similar level for the foreseeable future.

#### **K. Reduction in property values**

Several homeowners in the Airport vicinity submitted comments claiming that the improvements at Lake Elmo Airport would lead to a reduction in property value due to aircraft noise and other negative externalities of Airport activity.

The relationship between cumulative noise levels and property values is complex. The property value impacts of aviation noise have been studied on multiple occasions, with published study results beginning in the mid-1970s. Study results differ due to numerous airport-specific variables, including: (1) the level and frequency of noise; (2) the property location with respect to overflights; (3) the perceived amenities and quality of the affected neighborhood/community; (4) the local supply and demand for housing; (5) the local and regional economy; and (6) other market conditions that cannot be controlled or are difficult to predict.

The Airport Cooperative Research Program Synthesis 9, Effects of Aircraft Noise: Research Update on Selected Topics, provides the following overview of research conducted on the effect of aviation noise on property value: “In summary, the studies of the effects of aviation noise on property values are highly complex owing to the differences in methodologies, airport/community environments, market conditions, and demand variables involved. Whereas most studies concluded that aviation noise effects on property value range from some negative impacts to significant negative impacts, some studies combined airport noise and proximity and concluded that the net effect on property value was positive.” (Transportation Research Board of the National Academies, ACRP Synthesis 9 Effect of Aircraft Noise: Research Update on Selected Topics, 2008, p. 20.)

In the case of Lake Elmo Airport, the proposed improvements do not result in a change in the Airport's role and are not expected to attract larger aircraft or significant increases in flights. MAC staff is also not aware of any long-term or substantial property devaluations that can be attributed to recent airport improvements at Flying Cloud or Anoka County-Blaine Airports. In both cases, runways were extended to 5,000 feet to accommodate increases in corporate jet activity.

#### **L. Habitat and wildlife impacts**

This section contains responses to comments about habitat and wildlife, including those about impacts not studied in depth in the EA/EAW, and concerns about impacts to the federally listed endangered species the rusty patched bumble bee.

##### **i. Wildlife and habitat impacts not studied in depth in the EA/EAW**

Some comments focused on species that were not studied in depth in the EA/EAW. Some pointed out that removal of wetlands may impact waterfowl and affect the area's birdwatching or hunting use. Others were concerned about the loss or disruption of habitat for geese, ducks, sand hill cranes, trumpeter swans, coyotes, foxes, small mammals, deer, and plant species in the vicinity.

Wildlife habitat impacts associated with the project are primarily related to tree removal and wetland fill activities, which are described in Chapter 5 of the EA/EAW. These activities will utilize best management practices to avoid and minimize impacts to wildlife and their habitats. Chapters 4 and 5 of the EA/EAW acknowledge that there are many wildlife and plant species on and near the Airport and identify specific species that were observed with relative frequency by field surveyors in the project area. This level of detail is consistent with the FAA requirements for an EA/EAW and Environmental Quality Board (EQB) requirements for an EAW and is sufficient to establish a conclusion regarding impacts to wildlife habitats. The Minnesota DNR and the U.S. Fish and Wildlife Service were consulted before making this conclusion, as documented in the EA/EAW. No wildlife populations will be adversely and irreversibly affected by the proposed action, and biological resource impacts associated with the project do not rise to the level of a significant environmental impact under the National Environmental Policy Act.

#### ii. **Rusty Patched Bumble Bee**

Multiple comments expressed concern about habitat for the rusty patched bumble bee, an endangered species that has been observed in the area. Information about this insect and the efforts to minimize impacts on its habitat can be found in Section 4.6 and 5.2.2 of the EA/EAW document.

Rusty patched bumble bees (*Bombus affinis*, RPBB) live in colonies that have an annual cycle. The bees gather pollen and nectar from a variety of flowering plants and prefer tallgrass prairie habitat. The RPBB is a vital source in our food security and ecosystem. It plays a major role in wildflower reproduction, pollinate blueberries, cranberries, and clover, and are virtually the only insect that pollinates tomatoes. The bees once occupied grasslands and tall grass prairies of the Upper Midwest and Northeast, but most grasslands have been converted to monoculture farms, cities, or roads. Other contributors to RPBB habitat loss include intensive farming causing a heavy increase of pesticide usage, to which RPBB may be vulnerable. No critical habitat has been designated for the RPBB, and the Airport is in a low potential habitat zone according to the USFWS website. There are no areas of tallgrass prairie within the study area, and areas dominated by grasses and flowering forbs are mowed on a regular basis. Therefore, there are no potential vegetation types that provide habitat for the RPBB that would be affected by the preferred alternative. The USFWS Information for Planning and Consultation (IPaC) online tool does not identify this species as present within the limits of ground disturbance.

The FAA determined the preferred alternative “may affect, [but is] not likely to adversely affect” the RPBB on November 3, 2017, and the USFWS concurred in this determination by email dated December 7, 2017 (see Appendix E). In its December 7 email correspondence, the USFWS suggested that the MAC consider managing a portion of Airport property to encourage native flowering species that would provide nectar and pollen sources for RPBB and other pollinator populations that may be in the area. In response to this suggestion, the MAC is exploring creation of tall grass prairie in a 27.5-acre area south of the planned realignment of 30th Street North (see Figure 3-3 in the EA/EAW document). The prairie would be designed as foraging habitat for the RPBB and other pollinators. The tall grass prairie may have additional environmental benefits by reducing wildlife hazards, increasing on-site stormwater infiltration, and reducing the Airport’s carbon footprint.



## **M. Tree removal**

Comment responses within this general theme include addressing concerns about the general loss of trees on and around airport property, the specific impact that tree removal will have on aircraft noise and light emissions in the surrounding areas, and concerns that the tree removal scenario within the no-action alternative shows that the MAC has neglected this type of maintenance in the past.

### **i. Loss of trees**

Multiple commenters were concerned with the loss of trees that will be associated with the project and stated their opposition to the loss of the trees themselves and the trees as a natural habitat. Commenters were concerned with the number of trees that would be removed, as well as the fact that some of the trees slated to be removed are very old.

The MAC will carefully consider individual trees and remove only those that needed to comply with FAA criteria. Trees and woody shrubs observed at Lake Elmo Airport are listed in Chapter 5, Table 5-3. These are all common tree species in the Twin Cities metropolitan area. Identification of specific trees to be trimmed or removed will be determined during the detailed project design phase.

### **ii. Tree removal's effect on noise and light emissions**

Several comments from community members who live near the Airport and currently have a visual barrier of mature trees questioned how the removal of these trees would change the noise or lighting impacts on their property.

The noise contours developed for the EA/EAW consider the effect of terrain for the no action or proposed alternative scenarios, but do not account for trees. The contours are modeled for a treeless environment. Significant impacts of noise off Airport property are not predicted to occur, and inclusion of trees in the model would not change this conclusion.

The MAC recognizes that tree removal associated with the project will eliminate an existing visual screen between the runways and residential areas southeast and northeast of the Airport. See response to common theme E above.

### **iii. Lack of tree removal reflects neglected maintenance at Airport**

Some commenters expressed concern that the number of trees that would need to be removed under the no-action alternative reflect neglected maintenance at the Airport.

Trees to be removed under the no-action alternative have grown in recent years to the point that they need to be removed in order to comply with FAA airspace criteria. Obstruction mitigation plans are updated by the MAC periodically based on the latest available survey data.

## **N. Water contamination**

The community around Lake Elmo Airport has experience with contamination of wells and groundwater, and many comments expressed concerns that Airport improvements would exacerbate or contribute to contaminated waters in the area. The impacts of the project on water resources, wetlands, and

groundwater are discussed in Section 4.5 and 5.14 of the EA/EAW document. Multiple comments pointed out that the text of the EA/EAW document did not explicitly state that the study area is part of a designated Superfund site because of TCE contamination in the discussion of water quality and groundwater.

Baytown Township, West Lakeland Township, and the City of Lake Elmo are currently under a Minnesota Department of Health (MDH) enforced well advisory because of ground water contamination by volatile organic chemicals (VOC). The VOC contaminant is a solvent called trichloroethylene (TCE), which is a chemical that was commonly used in paints and adhesives, and as a degreasing and cleaning agent. The original source of the TCE contamination was a former metal working shop in Lake Elmo. The plume of TCE contamination spread in the groundwater, moving east through the Airport area to the center of Baytown Township.

The MDH is responsible for ensuring proper well construction and sealing of groundwater wells. Most residences in Baytown Township rely on private wells leaving private well owners responsible for their drinking water quality. Under the 2040 Baytown Township comprehensive plan, the township has no plans to provide municipal water services. The Airport is outside any wellhead protection areas identified by the MDH. The MDH Minnesota Well Index identifies Lake Elmo Airport as having roughly 26 wells on the airfield drawing from all four area aquifers with only a few wells reported sealed or abandoned. The MAC adopted a sanitary sewer and water policy for the Airport requiring all noncompliant wells be sealed. Because of the Minnesota Pollution Control Agency (MPCA) suspected the Airport of being a source of TCE, in May 1988 the MPCA issued a request for information to the MAC. The MAC investigated the Airport's groundwater from 1988 – 1991. TCE was found in the drinking water aquifer beneath the Airport. The MAC was declared to be the responsible party in 1991. The MAC and the MPCA conducted further investigations from 1992 to 1998. The MAC completed a 1999 feasibility study which recommended the installation of point-of-use granulated activated carbon filters (GAC). MPCA approved the GAC filters as a remedial action at the Airport. The MAC began installing GAC filter systems on private wells to meet the TCE drinking water standard at that time. The MPCA took over the program in 2007 after contamination was discovered at the former metal working shop in Lake Elmo. Additional investigation has convinced the MPCA that the Airport is neither the sole, nor most significant source of the Baytown contamination plume. The original Record of Decision was amended in July 2007 to reflect the final cleanup decision and public input.

TCE contamination was discussed in the Section 4.5 of the EA/EAW. While the term Superfund was not used in this chapter, it is discussed in detail in the Phase I Environmental Site Assessment prepared in September 2017, and attached to the EA/EAW as Appendix H. This Site was listed on the State Superfund Permanent List of Priorities List in 1988 and added to the Federal National Priorities List in 1994. The site has been consistently monitored and regulated since the 1980s. Following an initial Remedial Investigation/Feasibility Study by the MAC, the Minnesota Pollution Control Agency (MPCA) identified the primary source area and assumed responsibility for further work at the Site.

As noted in Appendix H, “the contaminated groundwater plume is located primarily in the Prairie du Chien Aquifer, the Jordan Sandstone Aquifer and, in certain areas, the Tunnel City Aquifer, all located more

than 50 feet below the ground surface.” Appendix H goes on to state that “The Airport is located at approximately elevation 920 to 930. According to the USEPA’s report, groundwater is located at approximately elevation 875 to 885 in the area of the Airport. Furthermore, the Prairie du Chien Aquifer, the highest elevation of the contaminated aquifers, is located at a depth of approximately elevation 850. Proposed project activities are not expected to reach a depth that would encounter groundwater. While the site poses potentially hazardous materials concerns for vapor intrusion, the site is regulated and monitored and recent sampling has confirmed that no volatile contaminants have exceeded State or Federal health-based screening levels. Previous Airport development has not been precluded as a result of known contamination. Therefore, no additional investigation is warranted.”

According to the latest groundwater monitoring data published by the Valley Branch Watershed District (VBWD) for the calendar year 2016, groundwater beneath the Airport generally flows from the northwest to the southeast. The top elevation of groundwater underneath the Airport ranges from approximately 875 feet above sea level in the northwest corner of Airport property to approximately 860 feet above sea level in the southeast corner. One of the wells that the VBWD uses to monitor groundwater levels in its jurisdiction is near the northeast corner of Airport property. Observations at this well in 2016 indicate an average top elevation of groundwater at 867.6 feet above sea level, compared to a top of well ground surface elevation of 934.9 feet above sea level. Thus, the difference in elevation between the ground surface and top of groundwater at this well is approximately 67 feet. This monitoring data is available on the VBWD website at [www.vbwd.org/reports/groundwater\\_levels/index.php](http://www.vbwd.org/reports/groundwater_levels/index.php).

Meanwhile, the ground surface topography and associated surface water drainage on the Airport generally slopes from northeast to southwest, except in the extreme southeast corner of Airport property where it slopes toward the southeast. Ground surface elevations on the Airport range from approximately 940 feet above sea level in the northeast corner of Airport property to approximately 920 feet above sea level in the southwest corner. Based on comparison of the groundwater elevations and surface topography elevations on the Airport, the depth to groundwater is approximately 50 feet or greater in areas directly affected by the project. In most areas, no excavation will take place because primary construction activities will involve placing fill material on top of the ground to build up the surface topography for the runways and taxiways. Excavation may occur to replace poor soils in select locations identified following detailed geotechnical investigations, but these activities are not expected to disturb any soils more than 5 feet below the existing ground surface and therefore will not disturb the aquifers beneath the Airport. Based on this information, the project is not expected to contribute to or exacerbate groundwater contamination on and surrounding the Airport, as stated in Section 5.7 of the EA/EAW.

The MAC is committed to protecting the groundwater and other water resources on which the Airport and its neighbors depend. The Airport is outside any wellhead protection areas identified by the MDH, but the MDH Minnesota Well Index identifies Lake Elmo Airport as having roughly 26 wells on the airfield drawing from all four area aquifers with only a few wells reported sealed or abandoned. The MAC has adopted a sanitary sewer and water policy for the Airport requiring all noncompliant wells be sealed. In accordance with federal and state regulations, the MAC also has a storm water pollution prevention plan (SWPPP) and a spill prevention, containment, and countermeasures (SPCC) plan which it administers using best

management practices to prevent further contamination of groundwater and surface water that may result from construction activities and typical Airport operations.

Regarding wetland impacts and corresponding mitigation efforts, the EA/EAW analyzes these topics in Section 5.14.1. A wetland delineation and functional assessment was conducted in summer 2017 to document wetland types and boundaries within the project area (see Appendix C). Based on the wetland boundary data collected during the delineation, there would be approximately 2.36 acres of direct wetland impact associated with the preferred alternative. Of these 2.36 acres, 1.85 are associated with the primary runway and associated taxiways, 0.12 acres are associated with the realignment of 30th Street North, 0.38 acres are associated with the crosswind runway extension, and 0.01 acres are associated with the planned access road.

Wetland mitigation will be required as a condition of an Individual Permit under Section 404 of the Clean Water Act. Mitigation will also be a condition of any permit or approval necessary for MDNR wetlands and for any wetlands under the jurisdiction of the Minnesota Wetland Conservation Act (WCA). Under WCA, wetland mitigation ratios for counties with fewer than 50 percent of pre-settlement wetland acreage remaining, such as Washington County, are 2.5:1. If the Airport sponsor replaces wetlands within mitigation Bank Service Area (BSA) 6, this ratio may be reduced to 2:1.

The MAC will consider wetland banking opportunities during the permitting process according to the wetland replacement priorities defined in the WCA statute. As of November 27, 2017, the Minnesota Board of Water and Soil Resources (BWSR) website indicates there are sufficient available wetland bank credits to mitigate for wetland impacts associated with the preferred alternative. The available wetland credit types correspond to the wetlands impacted by the preferred alternative and exceed the required mitigation for each wetland type. Purchase of wetland bank credits would occur after the exact wetland impact area is determined during design engineering, a process which may slightly change the estimated wetland impact and consequent wetland credit need.

#### **O. Aircraft operations estimates**

Responses in this category address questions about operations methodology and accuracy, as well as the number of military operations reported in the Draft EA/EAW.

##### **i. Operations estimates methodology and accuracy**

Several comments requested more information about the methodology for estimating annual operations or had concerns about the accuracy of the operations estimates. It is important to first note that the proposed improvements at the Airport are not dependent on a specific number of aircraft operations. The MAC would be making the same project recommendations regardless of the number of aircraft operations.

The MAC owns and operates a Noise and Operations Monitoring System (MACNOMS). In addition to monitoring noise levels at 39 remote noise monitoring towers located around Minneapolis-St. Paul International Airport (MSP), the system collects flight track through a multi-sensor surveillance data feed available for the U.S. National Airspace System. The data feed is a fusion of multiple data collection



services, including data from a privately-owned network of Automatic Dependent Surveillance-Broadcast (ADS-B) sensors, FAA enroute and terminal secondary surveillance data, FAA Airport Surface Detection Equipment Model X (ASDE-X) data, FAA Wide Area Multilateration (WAM) data and FAA flight plan data. The MAC has an agreement with an external secure data-handler to provide the merged data feed for flights operating within a 40-mile area around MSP and extending to a height of 20,000 feet. In 2014, a MACNOMS validation study found that 97.1% of MSP flights observed through field observations matched with MACNOMS data outputs.

Since there is no Air Traffic Control Tower (ATCT) at Lake Elmo Airport there is no “official” count of aircraft operations. Lake Elmo Airport is located approximately 18 miles from MSP; therefore, MACNOMS flight track data in the vicinity of Lake Elmo Airport were used in the detailed analysis of Airport-specific operations data for the EA/EAW. In addition to MACNOMS flight track data, the evaluation also used data from the FAA Traffic Flow Management System counts (TFMSC). The TFMSC database provides information on nationwide traffic counts by airport and city pairs and includes data for flights conducted under Instrument Flight Rules (IFR) plans.

There were 19,757 total aircraft flight tracks captured by MACNOMS at Lake Elmo Airport in 2016. Based on analysis of flight track start and end points, Mead & Hunt estimates that 18,542 of these flight tracks represent aircraft that took off or landed at Lake Elmo Airport. These tracks were analyzed and assigned to general aircraft engine type categories (i.e. single/multi-engine piston, single/multi-engine turboprop, jet, and helicopter) and then adjusted to account for typical MACNOMS capture rates observed at towered airports within the MAC’s system of airports. Per aviation industry criteria, each touch-and-go counts as two aircraft operations (a takeoff and a landing). Using this method, Mead & Hunt estimated that there were 25,596 aircraft operations at Lake Elmo Airport in 2016. More detailed information about operations estimates can be found in the EA/EAW document in Appendix A, Section 1.

Many comments also cited an article that appeared in the Pioneer Press March 31, 2018 regarding the St. Paul Downtown Airport. This article noted that there was recently a change in how operations are counted at some airports:

“Following a audit by the Federal Aviation Administration, some airports — including St. Paul — now have to calculate their flight counts a different way.

Prior to the audit, which took place several years ago, airports were able to count planes that flew in their airspace but didn’t land there — instances known as “overflights” — without even making contact with pilots via their control towers.

Now, according to the new FAA mandate, a plane must fly less than 3,000 feet above Holman field’s space and a control tower must make contact in order for the plane to be included in St. Paul’s operation numbers.

Data supplied to the Pioneer Press did not offer a level of detail that would determine how many planes had previously been included this way, but it should be noted there was a decline both before and in the years since the mandate was in effect.”

As of this writing, the referenced article is available at: [www.twincities.com/2018/03/31/holman-field-operations-traffic-decline-at-st-paul-downtown-airport/](http://www.twincities.com/2018/03/31/holman-field-operations-traffic-decline-at-st-paul-downtown-airport/)

Many commenters were concerned that operations estimates at Lake Elmo include these overflights, and that they had the potential to artificially inflate the numbers. However, the operations estimates in the EA/EAW do not include overflights, as there is no tower at the Airport to count such activity and these operations are not usually considered when evaluating the types of improvements considered by the proposed action. Therefore, the FAA’s audit and resulting change in how air traffic controllers count operations at the St. Paul Downtown Airport (STP) does not impact the aircraft operations estimates nor the conclusions in the EA/EAW.

#### ii. Military operations estimate

The numbers of itinerant military and itinerant general aviation aircraft operations shown in Table 4-1 were transposed in error. The table should read 169 itinerant military and 14,561 itinerant general aviation aircraft operations. This has been corrected in the Final EA/EAW. This correction does not change the environmental analysis, nor does it change the conclusions of the EA/EAW.

#### P. Proposed runway length

Responses in this category address questions about why a longer runway is proposed if aircraft are currently using the runway.

Commenters often pointed out that pilots use the current runway, so it must be meet the safety standards for the equipment currently operating at the Airport. If the role of the Airport is not changing to accommodate larger aircraft, what data suggests that the increased length is needed? This is explored in the EA/EAW document in Chapter 2, and examined in detail in Appendix A.

Primary Runway 14-32 at Lake Elmo Airport (21D) is currently 2,849 feet long. To determine the adequacy of the existing runway length, the LTCP documented specific runway length requirements based upon guidance from FAA AC 150/5325-4B *Runway Length Requirements for Airport Design*. The following summarizes some of the important concepts from AC 150/5325-4B regarding regular use and recommended runway length:

- The goal is to construct an available runway length for new runways or extensions to existing runways that is suitable for the critical design airplanes.
- The critical design airplanes (or single airplane) are the aircraft that result in the longest recommended runway length.
- The design objective for the primary runway is to provide a runway length for all airplanes that will regularly use it without causing operational weight restrictions.

Primary runway length needs were first evaluated utilizing FAA guidance provided in AC 150/5325-4B Runway Length Requirements for Airport Design for small, propeller-driven aircraft weighing less than 12,500 pounds and with fewer than 10 passenger seats. The AC identifies a recommended primary runway length of 3,300 feet for the 95 percent of fleet subcategory and 3,900 feet for the 100 percent of fleet subcategory. To more precisely identify an appropriate runway length within that range, individual takeoff and landing length requirements for a grouping of representative aircraft were then evaluated. In considering the individual operational requirements, the accelerate-stop distance was found to be the most demanding length, resulting in a recommended primary runway length of 3,500 to 3,600 feet. This length provides sufficient safety to accommodate aborted takeoffs, as well as longer roll out lengths required for landings when the runway surface conditions are wet and slippery, and braking is less effective. Feedback from the Airport users, and an analysis of trip lengths to and from the Lake Elmo Airport were also considered in evaluating the appropriate runway length conditions.

#### **Q. Pilot/community relations**

Several comments expressed concern regarding unnecessary aircraft noise that could be avoided if pilots would fly at higher altitudes or different times of the day. These commenters regarded the operational behavior of some pilots as disrespectful.

As noted previously, the MAC maintains a voluntary noise abatement plan at the Airport that prescribes preferred flight procedures, preferred runway use, designated maintenance run-up areas, and nighttime training procedures for minimizing aircraft noise exposure in noise-sensitive areas surrounding the Airport. To view the Noise Abatement Plan for Lake Elmo Airport, visit [www.macnoise.com/other-mac-airports/lake-elmo-airport-21d](http://www.macnoise.com/other-mac-airports/lake-elmo-airport-21d). The MAC has also installed “fly neighborly” signs around the Airport and provides resources such as pilot briefings and guides to educate Airport users about the importance of minimizing noise effects to Airport neighbors. The MAC plans to establish an airport advisory commission to address future concerns about noise and noise abatement at the Airport. In addition, the MAC will update the existing voluntary noise abatement plan and hold educational briefings for pilots to help reduce noise. MAC also manages a website and operates a noise complaint and information hotline for all its airports. For more information about its noise programs, view airport operations, or file noise complaints, please visit [www.macnoise.com/our-neighbors/file-noise-complaint](http://www.macnoise.com/our-neighbors/file-noise-complaint).

#### **R. Project cost and source of funding**

Many members of the public had questions about the use of taxpayer money for the improvements at Lake Elmo Airport. Commenters asked how the project could use FAA grant money, which is a federal source of funding, and not be derived from tax money, as the MAC previously indicated. Perceived use of taxpayer funding for a project with a limited user base was a source of opposition. Some commenters noted that this would not be the most conscientious or effective use of funds, especially as use of Lake Elmo Airport and other MAC General Aviation airports has decreased.

The estimated costs for the proposed improvements, as laid out in the LTCP, is \$13,325,000. The cost of reconstructing the existing airfield (minimum needed to continue operating the Airport) is \$5,400,000. No local sales or property taxes will be used to fund the project.

The project will be funded with revenues from various user fees. User fees are paid by people who use local and national airport and aviation facilities. This includes airport tenants and passengers. A combination of funding sources and financing mechanisms, including federal Airport Improvement Program (AIP) grants, state Airport Construction Program grants, and revenues generated by the MAC, could be used to fund the project.

The MAC anticipates most of the funding will come from AIP discretionary grants, which are awarded to airports by the federal government based on priority and available funding. These funds are collected from fees and taxes assessed only on those who use public airports throughout the country, such as airline ticket taxes, taxes on freight waybills, international departure fees and taxes on general aviation gas and jet fuel.

#### **S. Compensation for impacts**

Some commenters had questions about compensation for possible impacts to their properties, including repayment for loss of property value or loss of use of their property, and funds for mitigation of noise impacts including window replacement or repair.

MAC is not aware of any impacts that would result in loss of property value. See response to Comment Theme K [Reduction in Property Values]. Any impacts to use of property resulting from an airport zoning ordinance will be developed through the process described in the response to Comment Theme F [Zoning and Incompatible Land Use]. There will be no significant aircraft noise impacts under the preferred alternative. See response to Comment Theme D [Aircraft Noise].

#### **T. MAC should complete an Environmental Impact Statement**

Multiple commenters suggested that the MAC complete an Environmental Impact Statement to further study the proposed airfield project in more detail.

The required environmental analyses according to federal and state law are described in Chapter 1 of the EA/EAW. Federal financial participation in projects listed in the LTCP, through the Airport and Airway Improvement Act of 1982 (AIP), requires environmental review under the National Environmental Policy Act (NEPA) and FAA approval of the Airport Layout Plan elements associated with the proposed action evaluated under NEPA. This EA/EAW has been prepared in accordance with the requirements of Title V of Public Law 97-248 of the Airport and Airway Improvement Act of 1982, NEPA, and FAA Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions (April 2006). The document also meets the requirements of FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, dated July 2015.

This document has also been prepared under the Minnesota Environmental Policy Act (MEPA), which requires the Minnesota Department of Transportation and other state agencies to consider the environmental effects of its actions. Based on criteria contained in Minnesota Rule 4410, Subpart 21, an EAW is mandatory under MEPA “for construction of a paved, new airport runway.” According to Minnesota Rule 4410.1300, the MAC may circulate a federal EA in place of the EAW form, provided the EA addresses each of the environmental effects identified in the EAW form. This EA fulfills the



informational requirements of the EAW and contains the Minnesota EAW content, as provided in Minnesota Rule 4410.1200.

The intent of the EA/EAW is to provide the environmental documentation necessary to assist local, state and federal officials in evaluating the proposed action at 21D. The proposed action is evaluated along with a full range of alternatives to identify a preferred alternative which meets the project purpose and need. This analysis includes identification of measures to avoid, minimize, and mitigate possible environmental impacts. The EA/EAW is prepared in accordance with the procedural provisions of NEPA and MEPA. The FAA must evaluate this EA/EAW under NEPA and issue a Finding of No Significant Impact (FONSI) or prepare a federal EIS. The MAC must evaluate this EA/EAW under MEPA and issue a Negative Declaration on the Need for an EIS or prepare a Minnesota EIS. If the impacts studied in the EA/EAW exceeded significance thresholds set by federal and state regulations, preparation of an EIS would be required. Certain types of projects are also required to undertake an EIS under MEPA as described in Minnesota Rule 4410.4400, but the proposed project does not meet those criteria.

#### **U. Request a personal response**

Several commenters requested a personal written response from the MAC regarding their questions or concerns. While the MAC is unable to respond personally to each comment, comments are reproduced within this response to comments document in full and, where applicable, are sorted into similar themes. The above responses to common themes cover multiple aspects of the subject from questions received on the topic. Individual responses to the remaining comments are included in the matrix of public comments.

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/4/2018	Brad	Cornell	Public Hearing - Verbal	1A	I've lived in West Lakeland for 31 years. I live right off the end of the road, one way that's being proposed to be expanded, and on your first alternative for 30th realignment that road comes out -- would have come out at my driveway. ... And today I see a tremendous amount of traffic as a main corridor of 30th Street. That's 50 miles an hour today. I currently use it as my primary commute to work.	See General Comment Response B(ii)
4/4/2018	Brad	Cornell	Public Hearing - Verbal	1B	And having been out here for 31 years and seen a number of these long-term comprehensive plans be proposed and just pushed towards our township saying this is what we're doing some day, and as you mapped out in the foyer, that's a 1965 plan, and in 1965 none of us lived out here, and I built in 1987, and my past, in my youth, was on the Civil Air Patrol, so I'm very well-familiar with aircraft and flight patterns and things like that.	See General Comment Response H
4/4/2018	Brad	Cornell	Public Hearing - Verbal	1C	And your choice at this time to continue a long-term comprehensive plan of a runway or an airport potential expansion to a now non-compatible long-term comprehensive plan, our own township, it seems to me this is backwards;	See General Comment Response H
4/4/2018	Brad	Cornell	Public Hearing - Verbal	1D	your comprehensive plan is not aligned with our township but you're proposing and pushing forward.	See General Comment Response G
4/4/2018	Brad	Cornell	Public Hearing - Verbal	1E	You've spent close to \$700,000 in this process since 2013. I asked for those documents last spring or last fall at one of your public comment areas. You generated those documents and provided it to me. This report that was generated was estimated at \$400,000. So you've spent a significant amount of money on this long-term comprehensive plan, which means you're going to do it regardless what our township and the people sitting here in the room say and would like not to have happen, but it	The project is being proposed to meet the purpose and need and not because of the money invested in the planning and environmental processes. For additional information regarding the MAC's efforts in responding to and incorporating public input, see General Comment Response I(i).

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					appears not to be very compatible with our township or the neighbors.	
4/4/2018	Brad	Cornell	Public Hearing - Verbal	1F	You say you've had communication with our neighbors. We've been here at all the meetings. We don't get our real voice heard. We get listened to and then brushed off, like the 30th realignment. This is very inconsiderate that you haven't listened to our township to say this is an incompatible long-term comprehensive plan.	See General Comment Response I(i)
4/4/2018	Janel	Surgenor	Public Hearing - Verbal	2A	So I live in Easton Village. We moved there last May, so coming up to a year. The main thing I have is the noise. It was stated in the presentation that the analysis is saying that there's not going to be much of an effect or minimal, but my question or my statement is you don't live in Easton Village so you don't know what that impact is going to be	See General Comment Response D
4/4/2018	Janel	Surgenor	Public Hearing - Verbal	2B	there's no guarantee that you guys aren't going to increase your airplanes. You say not but, again, there's no guarantee.	See General Comment Response A(i)
4/4/2018	Janel	Surgenor	Public Hearing - Verbal	2C	the MAC is not going to give me new windows; we just built there less than a year ago.	See General Comment Response S
4/4/2018	Janel	Surgenor	Public Hearing - Verbal	2D	And then the removal of the land to expand the runway.	The MAC purchased land in the late 1960s and early 1970s to facilitate the airfield improvements being proposed. No additional land acquisition is planned as part of the proposed action.
4/4/2018	Ann	Bucheck	Public Hearing - Verbal	3A	It has been reported by the St. Paul Pioneer Press, the proposed 2040 Lake Elmo Comprehensive Plan and yourself that airport operations have plummeted over the past decade. We, the majority, at every turn have continued to ask why you want to expand this airport.	See General Comment Response J(iv)
4/4/2018	Ann	Bucheck	Public Hearing - Verbal	3B	Under Minnesota Statute 473.602, the MAC is vested with, among other things, "in part, to providing for the most economical and effective use of aeronautic facilities and services in that area." ... If not all airport operations are being used fully, then how can you possibly provide the most	The MAC aims to fund the most appropriate actions for the unique role of each airport within the system, leading to economic and effective outcomes. The proposed action considered by the EA/EAW is consistent with this mission.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					economical and effective use of the taxpayers' monies by expanding the Lake Elmo Airport? It's time to turn your energies to learning how to fully utilize the ones you have.	See also General Comment Response R
4/4/2018	Ann	Bueck	Public Hearing - Verbal	3C	I would encourage you to use the Holman Field.	See General Comment Response C(ii)
4/4/2018	Ann	Bueck	Public Hearing - Verbal	3D	I felt that there were mistakes and it was not complete in some respects. One, how much income is derived from the 300.5 acres of leased agriculture land on the airport property? Will this income be forever lost for the taxpayers of this state if you go ahead with your plan?	In 2017, the MAC received a little over \$48,000 in revenue from agricultural leases at Lake Elmo Airport, representing approximately 15.5% of direct revenues associated with Lake Elmo Airport operations. The reduction in agricultural land resulting from the project is approximately 20% of the total farmland acreage currently leased. Assuming that agricultural lease revenues decrease at a similar rate, this would result in approximately \$10,000 in lost revenue per year, or approximately 3.2% of annual direct revenues. This reduction would not affect taxpayers, as MAC is self-supporting in operating its airports and does not rely on local property taxes or sales tax revenues.
4/4/2018	Ann	Bueck	Public Hearing - Verbal	3E	Second, your report states peak traffic drive times from Lake Elmo Airport to all nine airports are 30 minutes or greater. However, according to the St. Paul Pioneer Press, it took a West Lakeland resident 18 minutes to get to the Holman Field Airport and 23 minutes to get to the New Richmond Regional Airport from the Lake Elmo Airport. According to the table that's listed in the EAW, it also stated it could take up to 55 minutes with traffic to reach the Minneapolis/St. Paul main terminal. I have lived within five to ten minutes of the Lake Elmo Airport for 40 years. It has never taken me, in those 40 years, 55 minutes under the absolute worst traffic conditions to reach that	See General Comment Response C(v)



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					airport. I would like to know how were these described times determined?	
4/4/2018	Ann	Bueck	Public Hearing - Verbal	3F	When discussing the Lake Elmo Airport you speak of the zoning. However, directly across the street to the west of the airport and within view are 469 built or approved-for-construction homes that are or will be homes to approximately 1,157 people that should feel safe in their homes. A woman that just spoke is one of those. These people will live in Easton Village, Village Preserve, Village Park Preserve and Heritage Farms.	See General Comment Response F(ii)
4/4/2018	Ann	Bueck	Public Hearing - Verbal	3G	You discussed the wildlife strikes but no mentions of the airplane crashes. Since we have -- since I personally have been witness to three crashes, one on Legion and 24th, which is right down the street from me, one on Lake Elmo Avenue and another on 10th Street, I think this needs to be addressed. If we have an expanded airport, will we see more crashes? Will they be human strikes? Is there a potential disproportionate health or safety risk to children? And I might add when I walked in tonight, a neighbor who lives close to the airport said I was way off by the crashes and he would like to know how many crashes has there been. He knows of ones that are right on the airport.	See General Comment Response F(v)
4/4/2018	Ann	Bueck	Public Hearing - Verbal	3H	Your report also stated, "No significant man-made wildlife attractants are located within one mile of the Airport." What about the holding ponds that some could call "significant man-made wildlife attractants" that have been made and are being constructed for Easton Village -- the woman who just spoke lives there -- and Village Park Preserve directly to the west of the airport? The airport should be concerned for the safety of the pilots as these will attract geese and other wildlife strikes. In October of 2017, your wildlife observers witnessed over 400 Canada geese continuous morning flights traveling south to north. With continued	See General Comment Response F(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					ponding, will there also be possible causes for crashes? Loss of life? ... We all remember American Airlines' Captain Sully who had to land on the Hudson River.	
<b>4/4/2018</b>	<b>Ann</b>	<b>Bucheck</b>	<b>Public Hearing - Verbal</b>	<b>3I</b>	I was also going to talk about the lakes and how you're off; the St. Croix River is not 200 miles long; and I was also going to be talking about the tree removal you have in relation to the amount of lights that are going to be used, which is unfortunate.	The St. Croix National Scenic Riverway designation includes parts of the Namekagon River, a major tributary to the St. Croix, together totaling 200 miles in the upper section. This has been clarified in Section 4.5.3 of the Final EA/EAW. For more information about tree removal's effect on noise and light emissions, see General Comment Response M(ii).
<b>4/4/2018</b>	<b>Ann</b>	<b>Bucheck</b>	<b>Public Hearing - Verbal</b>	<b>3J</b>	And, finally, I, along with the majority, wish to reinstate my objection to your plans and ask that you tend to the business of providing for the most economical and effective use of aeronautical facilities by fully utilizing the ones you have.	The MAC aims to fund the most appropriate actions for the unique role of each airport within the system, leading to economic and effective outcomes. The proposed action considered by the EA/EAW is consistent with this mission.  See also General Comment Response R
<b>4/4/2018</b>	<b>Ann</b>	<b>Bucheck</b>	<b>Public Hearing - Verbal</b>	<b>3K</b>	You may even wish to collaborate with the New Richmond Wisconsin Airport.	See General Comment Response C(i)
<b>4/4/2018</b>	<b>Fred</b>	<b>Brandt</b>	<b>Public Hearing - Verbal</b>	<b>4A</b>	These comments relate to how this runway extension is marketed to the public within the constraints of operating larger twin engine and single-engine aircraft and their respective all-weather performance engineering and certification limitations. Specifically, the impact of the following: Outside air temperature, altimeter settings and headwind components; an operational maximum tailwind component of 10 knots; runway contaminants such as ice, wet snow, dry snow, slush, standing water or any combination thereof; runway braking action reports; runway sloping, if any; bird strikes; airport de-icing capabilities and fluid recovery procedures; accelerate stop distances and balanced field length requirements to include a possible stopway; second segment climb profiles after engine failure over congested	See General Comment Response P

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					<p>housing areas; and the associated noise abatement impact in the respective climb corridor. In many, and possibly most cases, a 3,500-foot runway would significantly limit the performance engineering capabilities of such an aircraft relative to a max gross weight take-off or max landing weight landing. Consequently, the only way to operate within the entire performance envelope of all of the above limitations would be significantly reduced weights, be it via reductions in passengers, cargo, fuel or any combination thereof. That being the case, it may be deemed unprofitable for such aircraft to consistently operate out of Lake Elmo and only do so on a limited basis and within the constraints of these performance degradations. In conclusion, these comments only relate to aircraft capabilities and within the parameters of aircraft certification. They do not give any consideration to pilot judgment or any implication of operating in violation of FAR 91.13 as it relates to careless or reckless operations.</p>	
4/4/2018	Troy	Wenck	Public Hearing - Verbal	5A	<p>I'm a resident of Woodbury. I'm a business owner here in the Twin Cities metro area. I'm a pilot, hopefully a safe pilot. I use the airport. I use the airport for business travel and for pleasure. I want to thank MAC, the Commissioners, the Committee for your hard work on this report and this process. MAC's charter is to promote regional -- promote air transportation and commerce for the seven-county regional area, and I appreciate you being true to that in this process and looking at this airport as one of the seven airports in your charter and how it can support the successful operation of airports as a whole.</p>	Comment noted.
4/4/2018	Troy	Wenck	Public Hearing - Verbal	5B	<p>As I read the report, it appears that the proposed improvements are within all of the existing environmental policies. It appears that all the environmental consequences of the expansion are either not applicable, like</p>	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					the coastal regulations, or they're negligible, or they can and have a plan to be mitigated, so I fully support the expansion plan moving forward.	
4/4/2018	Troy	Wenck	Public Hearing - Verbal	5C	Now as it relates to my neighbors who are opposed to the project, I understand their opposition. I've heard a couple comments about how long folks have lived here. I'd like to note that the airport has been in Lake Elmo for something like 70 years, since World War II.	Comment noted.
4/4/2018	Troy	Wenck	Public Hearing - Verbal	5D	And I would also like to note that the room, when I walked in, had 163 people sitting in the auditorium and the population of the township and the town of Lake Elmo is about 11,000 people. So when folks talk about a majority opposed to the expansion, the number of people who chose to show up tonight to voice their concerns represents just over 1 percent of the people in the immediate vicinity and a small fraction of the percentage of the residents of Washington County.	Comment noted.
4/4/2018	Barry	Rosell	Public Hearing - Verbal	6A	I happen to live on 27th Street, so my house is in all of your maps. Everybody can look at my yard if you'd like, as opposed to the previous speaker who lives in Woodbury. I'm glad you enjoy flying your airplane over my house. But what I would like to reference, as someone else mentioned this same article I think, but it's the Pioneer Press just a week or so ago, March 31st, about Holman Field. It says, "Overall operation counts from all sources at the airport dipped from 118,000 in 2007 to 40,500 in 2017." This is at Holman. I'll skip much of the rest. It says MSP went from 453,000 to 416 in the same time frame. Flying Cloud went from 118,000 to 91,000. The worst decline behind St. Paul was Crystal's airport where flights dipped from 54,000 to 34,000. Why the decline -- and again I'll skip some of the information -- but it says, "Where back in the 1980s it was	See General Comment Response J(iv)



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					predominately recreational flying and flight training where corporate flights made up about 30 percent of operations, now between 80 and 90 percent of the flights are corporate and 'corporate flights have drastically decreased over the past decade,' MAC officials said."	
4/4/2018	Barry	Rosell	Public Hearing - Verbal	6B	So my comment is beyond restoration of obviously current runway surfaces, adding safety features for the pilots such as instrumentation and lighting. I don't understand why MAC would continue to force this	See General Comment Response C(iii)
4/4/2018	Barry	Rosell	Public Hearing - Verbal	6C	and spend the money, our tax dollars, for the potential for larger and more aircraft here when the current MAC resources are so underutilized. As an engineer, that does not make sense to me.	See General Comment Response R
4/4/2018	Barry	Rosell	Public Hearing - Verbal	6D	the potential for larger and more aircraft here	See General Comment Response A(i)
4/4/2018	Barry	Rosell	Public Hearing - Verbal	6E	And, secondly, as a 20-year resident who does recall when some Beechcraft Air Kings used to try to fly in and literally rattled the windows on a house, I mean it was -- we love the airport, I'll say that. We built here, the airport was here and we love it in its current state, no problems with that. But when those big planes fly in, it literally -- the brand-new house, windows rattle, it's like what in the world is going on. It didn't happen very often.	See General Comment Response D
4/4/2018	Barry	Rosell	Public Hearing - Verbal	6F	And one time I cornered one of your engineers out at the water fountain and we talked and I asked about all of this noise mitigation and all these things that they were going to do and the things that were listed again here, and I said, "How are you going to enforce that?" And he kind of looked away and he wouldn't look me in the eyes and he says, "Well, we can't really enforce any of it; it's unenforceable." ... But if you can force this airport on us, why the heck can't you	See General Comment Response D

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					force pilots and the airport and some type of management system of the noise that is going to come.	
4/4/2018	Barry	Rosell	Public Hearing - Verbal	6G	If you can force this airport on us and you can say how many people show up here, well, I think a lot of us have just given up. It's like you're going to do it anyway	See General Comment Response I(i)
4/4/2018	John	Renwick	Public Hearing - Verbal	7A	I'm in support of the plan. I'm an airport user.	Comment noted.
4/4/2018	John	Renwick	Public Hearing - Verbal	7B	People have called this an airport expansion. It is not. It's being done within the boundaries of existing MAC property. There's no plan for any more buildings, there's no plan for any additional capacity to house aircraft. We're maxed out as it is, so this isn't going to mean any new aircraft moving into Lake Elmo. The only thing that's increasing is the runway lengths, and the only reason to do that is for enhanced safety for pilots and neighbors, so it's not an expansion, it's an improvement.	Comment noted.
4/4/2018	John	Renwick	Public Hearing - Verbal	7C	And to the comment from Easton Village, I would say that it's actually going to help them because it moves the main runway several hundred feet to the northeast, which is going to reduce the amount of noise they experience over there, and that's my comment.	Comment noted.
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8A	I understand from reports that I've read that one of the main purposes of this proposed expansion is to benefit private corporations by allowing bigger and heavier planes. And let's not kid ourselves, at some point this is going to expand even more, it's going to be jets, but, whatever.	See General Comment Response A(i)
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8B	Now this is despite reports that there are two existing airports; one 16 nautical miles to the northeast and one nine nautical miles to the southwest. In other words, we're right in between; both of which one could drive to in less than 30 minutes, substantially less than 30 minutes,	See General Comment Responses C(v)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8C	both of which are currently fully capable of providing all of the services to private corporations that this airport now wants to expand to create.	See General Comment Response C(i) and C(ii)
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8D	As to the New Richmond Airport, the reports I've seen say congressional representatives in Wisconsin are fairly begging the FAA to divert funds there so they can improve the airport that they have; that it's already capable of servicing the planes that Lake Elmo is wishing to bring in here	See General Comment Response C(i)
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8E	And as to the Holman Field, as somebody mentioned, it's dramatically underused right now as the other MAC airports are as well.	See General Comment Response C(ii) and J(iv)
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8F	According to the proposal, and to facilitate these private corporations being able to fly in and out of here, they'll be flying bigger and heavier airplanes that will obviously be much louder.	See General Comment Response A(i) and D
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8G	you're talking about cutting down some of my trees, one of which presumably you're looking at is an over-300-year-old white oak that's been here long before the Revolution and it's worth a hell of a -- heck of a lot of money.	The MAC will carefully consider individual trees to only remove those needed to comply with FAA criteria. The FAA requested that any tree areas that may have individual penetrations to these surfaces within a reasonable period beyond project implementation (~5 years) be identified in the EA/EAW. Identification of specific trees to be trimmed or removed will be determined during the detailed project design phase.
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8H	Now you're going to extend the runways so that these airplanes are undoubtedly going to be buzzing our houses at lower -- and properties at lower levels than they have before.	See General Comment Response D and Q
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8I	Not only that, you're going to light up a runway so that instead of having roughly 12 hours or less a day, now it's going to be more than that; now it's going to go into the evening and it's going to ruin our evenings.	See General Comment Response D and E
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8J	Section 13 of the Minnesota Constitution requires that before you take any action you must make sure that you can provide -- "that	See General Comment Response S

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					<p>private property shall not be taken, destroyed or damaged without just compensation thereof first paid and secured." [As read.] So my question is this: How much of this \$13.5 million budget has been set aside to compensate the many homeowners for the increased air pollution, noise, loss of peace and quiet and loss of property values that will inevitably result, not to mention substantial legal costs that the MAC is going to have to incur in defending these things. Now there's been a couple comments about, you know, my house has been there -- my house was built where it is now; it was built in the 1880s. I've been here for almost 30 years. And what we're talking about here, as I understand it, and I'll be corrected -- if I can be corrected, I'll be happy to be corrected -- but my understanding is this is not just a repair, this is a substantial change in the current airport and it's going to cost money. It's going to cost us money or it's going to cost you money, and so my point is has that been budgeted for? Has that been looked at?</p>	
4/4/2018	Mark	Wendorf	Public Hearing - Verbal	8K	<p>If you want to take away my tree that's over 300 years old, we're going to be talking about that, and I'm sure there's a lot of other people out here that are going to be talking about the loss to their property values, the loss to their use and enjoyment of their property that has to be compensated under the Minnesota Constitution and Minnesota case law, several cases that you no doubt know that will support that.</p>	<p>The MAC will carefully consider individual trees to only remove those needed to comply with FAA criteria. Identification of specific trees to be trimmed or removed will be determined during the detailed project design phase.</p> <p>See also General Comment Response S</p>
4/4/2018	Rob	Creibich	Public Hearing - Verbal	9A	<p>I just want to go on the record to basically say that we think this project is totally unnecessary and a duplication of services that exist 35 minutes from here.</p>	<p>See General Comment Response C(i)</p>
4/4/2018	Rob	Creibich	Public Hearing - Verbal	9B	<p>when you talk about the decline in business in Minnesota, there's good reason for that. It is much cheaper to register a plane, to house a plane and to fuel a plane in Wisconsin.</p>	<p>See General Comment Response C(i) In addition, general aviation activity has been declining nationwide since 2000. Downward trends in general aviation</p>



Date	First Name	Last Name	Source	Comment ID	Comment	Response
						operations in both Minnesota and Wisconsin have reflected this national trend. However, the FAA forecasts that general aviation operations will stabilize and begin to marginally increase over the next few years in both Minnesota and Wisconsin. For more information on FAA forecasts by airport and state, see <a href="https://taf.faa.gov/">https://taf.faa.gov/</a> .
4/4/2018	Rob	Creibich	Public Hearing - Verbal	9C	And when you talk about federal tax dollars, \$11 million, we need 2 or \$3 million to extend sewer and water to further expand the seven businesses there and the 200 aircraft that are currently stored there.	The proposed action does not include extension of sanitary sewer and water to Lake Elmo Airport. The MAC will continue to study the costs, benefits, and feasibility of serving the Airport with sanitary sewer and water. The steps for installation of sanitary sewer and water facilities will be considered when a Metropolitan Urban Services Area (MUSA), and related agreement and access, are available.
4/4/2018	Rob	Creibich	Public Hearing - Verbal	9D	So we think you should listen to the people, the will of the people here, and look regionally beyond the borders of Minnesota to see that the logical solution here is not to wreak havoc on the environment, to go against the will of so many citizens here	See General Comment Response I(i)
4/4/2018	Rob	Creibich	Public Hearing - Verbal	9E	do the right thing for federal taxpayers, and that is to reallocate these dollars to New Richmond and not duplicate the service there.	See General Comment Response C(i)
4/4/2018	Rob	Creibich	Public Hearing - Verbal	9F	So I'm working with the federal officials, U.S. Senator Ron Johnson, Congressman Sean Duffy, U.S. Senator Tammy Baldwin. We are going to fight you for these \$11 million that we think can be better spent at an existing state-of-the-art airport just 35 minutes away.	See General Comment Response C(i)
4/4/2018	Rob	Creibich	Public Hearing - Verbal	9G	This is federal tax dollars so we think we have a right to vie for those dollars.	See General Comment Response R
4/4/2018	Molly	Olson	Public Hearing - Verbal	10A	I'm fairly new to the community, about a year and a half. Just as I bought my lot I realized what was happening shortly after that with the airport expansion, even though I had learned prior to that that it was just a small,	See General Comment Response A(ii)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					<p>very small, tiny, micro planes, whatever you call them, recreational airplanes that just flew for fun, for hobby, and that's all it was and that it would never be more than that. I did due diligence. I didn't even start to build my home until one year after the lot was bought because I wanted to know what was going on. I didn't have to build in this area. But because of the things that I heard and because of the things that I see, it seemed obvious that of course the airport wouldn't be expanded. Look around, look at the area.</p>	
4/4/2018	Molly	Olson	Public Hearing - Verbal	10B	<p>We all know and have heard tonight that the plan was created in 1965 when the community looked extremely different.</p>	See General Comment Response H
4/4/2018	Molly	Olson	Public Hearing - Verbal	10C	<p>And I mean for the sake of the record, I hope FAA people are reading my testimony some day in the future to say, please, come out here, look, look around the airport and see what this will do to the residents in this area and the land and the community, especially with all of the variable things that were added on the very tail end of the environmental study by Evan's presentation. The very last document were "other cumulative things" going on, or whatever that was, which I think was almost like the first time I had heard that on one of the reports. But there are so many, many other things that are going on that are being ignored.</p>	<p>The National Environmental Policy Act (NEPA) requires the analysis of cumulative impacts, or impacts on the environment that result from the incremental impact of the action when added to past, present, and reasonably foreseeable development in the area that is not directly associated with the preferred alternative, regardless of what agency or person undertakes such actions.</p> <p>The Minnesota Environmental Policy Act (MEPA) also requires the analysis of cumulative potential effects, or effects that result from the incremental effects of the project in addition to other projects in the "environmentally relevant area" that might "reasonably be expected to affect the same environmental resources."</p> <p>The Draft EA/EAW properly evaluates all cumulative impacts in accordance with NEPA and cumulative potential effects in accordance with MEPA.</p> <p>These actions on and near the Airport were initially presented for discussion at Public Event #3 on November 6, 2017, and input on projects occurring near the Airport</p>

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						was sought at community engagement panel meetings. In accordance with State and Federal environmental review requirements, information regarding these actions and associated cumulative effects can be found in EA/EAW Sections 4.8 and 5.15, respectively.
4/4/2018	Molly	Olson	Public Hearing - Verbal	10D	we know in the community that the airplane counts that you have and the flight counts that you have in your documents are completely not true. Completely not true. Those of us who live in the area, we hear, we know the number of flights that are landing and the number of -- the amount of traffic that's in the air, and it's completely impossible that there is that many flights taking on and off with the numbers that you have. So I believe, and many of us in the community believe that the numbers are incorrect, they've been fudged, and that if the reality and the truth of the numbers were provided to the FAA, this airport wouldn't even qualify for the funding.	See General Comment Response O(i)
4/4/2018	Molly	Olson	Public Hearing - Verbal	10E	And again, the noise. Of course -- thank you everybody who has spoken tonight about the noise -- of course there will be excess noise.	See General Comment Response D
4/4/2018	Molly	Olson	Public Hearing - Verbal	10F	And in addition to that, I appreciate the process that you've allowed us to actually say something, but as others have said tonight, that nothing that we have to say about the opposition of this matters at all, and that is completely why people -- more people than this don't show up.	See General Comment Response I(i)
4/4/2018	Molly	Olson	Public Hearing - Verbal	10G	And the other thing is people want to be able to trust their government. They think the government -- too many people think the government is there working to help us and do the right thing for us and to protect us but it's not. Government is just there to build more government and more bureaucracy and it's so evident by what you're doing by wasting all this money. The people that are not here are probably likely a lot of those	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					from that group that trust their government to do the right thing or have given up, one of the two.	
4/4/2018	Molly	Olson	Public Hearing - Verbal	10H	You know, we -- finally we see an overhead with a more thorough documentation of some of the concerns that we've had, but for meeting after meeting after meeting our concerns were completely ignored. What were some of the things that were not even on there?	See General Comment Response I(i)
4/4/2018	Molly	Olson	Public Hearing - Verbal	10I	There is -- we have complained about this at other meetings when you talk about the purpose and the need. Well, it's the purpose and the need for, for MAC; it's not the purpose and the need for the community or the airport itself. It doesn't need it.	See General Comment Response J(i)
4/4/2018	Molly	Olson	Public Hearing - Verbal	10J	It's small hobby planes, and we're spending, what was it, \$14 million to help satisfy the hobby for a lot of people?	See General Comment Response J(iii)
4/4/2018	Molly	Olson	Public Hearing - Verbal	10K	And we know that there's a private school over there, too, that people are learning, so we're paying all these taxpayer dollars for a private school? And how much of that private school is the number of the flights that go up and down, the takeoffs and landings?	<p>The fixed base operator (FBO) at Lake Elmo Airport is a private business that provides flight training. The FBO and other private businesses on the Airport do not receive taxpayer dollars to support their operations. The FBO and other Airport businesses pay taxes in various ways (aircraft registration, income taxes, etc.) and also support the Airport through revenue paid to MAC. The MAC is mandated by state law to "promote air navigation and transportation...in and through the state" and to "promote the efficient, safe, and economical handling of air commerce."</p> <p>Flight training activity by the local flight school represents only one segment of the user community at Lake Elmo Airport. The Airport primarily supports general aviation (GA) and air taxi operators. GA represents all civil aviation activity not defined as commercial and includes a variety of users and activities, including corporate and</p>



Date	First Name	Last Name	Source	Comment ID	Comment	Response
						business operators, recreational users, flight training, agricultural applications, law enforcement, and other government uses. Air taxi represents for-hire, on-demand commercial activity that is conducted on an unscheduled basis. Various based and transient aircraft operate at Lake Elmo Airport, the majority of which are owned and operated by private individuals or entities. As of March 2018, Lake Elmo Airport hosts 182 fixed wing aircraft and 2 helicopters, the majority of which are used for purposes other than flight training. Based on detailed analysis of available airport-specific operations data, Mead & Hunt determined that approximately half of the total 2016 operations at Lake Elmo Airport were conducted by aircraft that are not based at the Airport, which included operations by numerous aircraft types not based at the Airport. This component of the Airport user community is also an important consideration in evaluating facility needs at Lake Elmo Airport.
4/4/2018	Molly	Olson	Public Hearing - Verbal	10L	it is incomprehensible that this volume of dollars would be spent for a project that is so unnecessary.	See General Comment Response J(i) and R
4/4/2018	Molly	Olson	Public Hearing - Verbal	10M	And that 30th? I would think the FAA would look at that curvature in the road that you've created on 30th and hopefully somebody will look at that and say they can see on the piece of paper that is absolutely ridiculous.	See General Comment Response B(i)
4/4/2018	Patrick	Fleming	Public Hearing - Verbal	11A	I live in Lake Elmo, I fly out of Lake Elmo Airport. I fly almost exclusively for personal transportation. I fly a Cherokee 6. When I'm traveling, I do not land at airports with less than 3,000 feet of runway. If it's a hot day I won't land at less than 3,500 feet of runway. I make an exception at Lake Elmo Airport because I know the airport so well. But I cannot fill that airplane with my family and fuel and take off on a hot day and feel safe. I have to make alternative arrangements,	Comment noted.

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					which are little cumbersome. I appreciate your work on this and I look forward to a 3,500-foot runway.	
4/4/2018	Susan	Dunn	Public Hearing - Verbal	12A	I'm from Lake Elmo, Minnesota and I'm pushing 80, and I've been down at these meetings for as long as these people have been alive. Lake Elmo Airport has always been an integral part of the area and has been enjoyed by a lot of people, and I will do written comments. But I do have some real environmental concerns. We do have big issues in Lake Elmo and Washington County, and I do not -- I think we can preserve what we have. I do not think we need to expand anything, and if you have to do any further investigation, an EIS would be appropriate.	See General Comment Response T
4/4/2018	Mark	Montanari	Public Hearing - Verbal	13A	My issue is with the noise, as some of the people brought up already, but it isn't really with the airplanes flying over. When I moved into the area here 25 years or so ago, the north end of the airport didn't have the commercial buildings over there. Since then, traffic has picked up obviously. But, frankly, I would like to see MAC try to curb some of the time issues when some of these planes can take off. Now maybe you can go do it, maybe you can't. Obviously they're privately owned businesses. But I'm getting tired of hearing the same plane Monday through Friday at 5:00 in the morning and having it out there warming up for 15 minutes and then listen to them take off. And so if something could be done about the noise in that respect, I know it's different than being in the air flying over, but still if it gets bigger out there, maybe it's not expanding as you say, something -- I would like to see something done with the noise. And if it starts at 5 in the morning, who knows, maybe it will be going at 10, 11:00 at night, too, depending on what their business operation is over there.	See General Comment Response D

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14A	I live on Neal Avenue, and I have been to a number of these meetings. I'm opposed to the project.	Comment noted.
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14B	Project seems unnecessary.	See General Comment Response J(i)
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14C	I don't feel like the MAC has been honest with us in many respects, and we've had several that have testified to that tonight. You don't give me the impression of a trustworthy partner in this process.	See General Comment Response I(iii)
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14D	You go through this process, you ask us for comments, but then those comments -- then you say you're listening but the comments are not integrated.	See General Comment Response I(i)
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14E	I don't mind the airport being here and I'd be fine with repaving the runway as it is, keep it existing,	See General Comment Response C(iii)
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14F	You give me the impression of a bully that just wants to have your way. [...] I'm not a fan of the MAC or the Metropolitan Council, to be honest. Anybody who pays attention to these issues has seen many times that your agency and your parent agency throw their weight around a lot and they seem to trample people's rights, and I don't appreciate that. And ever since I was a little kid I fought bullies, and this seems a lot like when I was on the playground as a six-year-old -- sixth-grade kid. The process has not seemed honest or fair	See General Comment Response I(i) and I(iii)
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14G	It seems to me the bottom line of this whole thing is that you want the federal money to repave your runway and the only way that you can get the federal money is to enlarge the runway. Or we had a gentleman that said this is not an expansion. Making a runway longer is not an expansion, I guess. So lengthening the runway is a requirement to get the federal money and I think that's what this all boils down to.	See General Comment Response J(ii)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14H	he called this money tax dollars. I've challenged that before in a meeting and I don't know who is right. Because the MAC has told me in personal conversations that these aren't tax dollars, that they're -- so you say they're not; he says there is. Maybe the truth is in the middle, but it is public money.	See General Comment Response R
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14I	it is public money. So there should be -- the prospect or the process, it just does not seem fair.	See General Comment Response I(i)
4/4/2018	Mike	Seeber	Public Hearing - Verbal	14J	And at a number of points along the way the information that we've been given has not been correct.	See General Comment Response I(iii)
4/4/2018	Mike	Graczyk	Public Hearing - Verbal	15A	I'm from Lake Elmo. I'm a pilot and I own an airplane at Lake Elmo and I fly a lot and aviation has been my whole life, probably since I've been young and working on little motors at 12 or so. Anyway, I hope I can trust the MAC to make the correct decision on the future use of the Lake Elmo Airport. It's been there for a very long time and the pilots there and the people I know there, and I've been there for a long time, too, are concerned about the community. And I don't believe that they're offensive neighbors and they keep noise down and they're looking to use their airplanes and enhance aviation, which is a very integral part of our society in a sense.	See General Comment Response Q
4/4/2018	Mike	Graczyk	Public Hearing - Verbal	15B	The airport is a good place to learn how to fly, and to keep one's aircraft	Comment noted.
4/4/2018	Mike	Graczyk	Public Hearing - Verbal	15C	So as I say, I'm not totally prepared to make a comment here but I trust that you'll make the right decision as to the future of the Lake Elmo Airport and keep it as the Lake Elmo Airport, and that's really all I want to say about it right now. I think for the most part that has not been an offensive community, that is, the Lake Elmo Airport, to the surrounding area.	Comment noted.



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4/4/2018	Mike	Graczyk	Public Hearing - Verbal	15D	You mentioned about some loud, lumbering, crash -- Beechcraft that crashed. That airplane was built in 1950-some. They don't operate them anymore, they don't make noise like that. New airplanes that replaced them are a lot quieter and a lot safer and they'll blend in with the neighbors a whole lot better.	Comment noted.
4/4/2018	John	Krack	Public Hearing - Verbal	16A	[Chair of Reliever Airports Advisory Council, flies out of Anoka.] I do speak in favor of what MAC is trying to do, but I also have some sympathy with some of the comments that people have made. What I'm hearing is that the only solution, shall we say, that would satisfy most of the people in the room that are opposed to what MAC is doing is to leave the airport as it is or close the airport. If we close the airport, we are now faced with having to compensate all of the people who have made large investments in the airport. I don't know where the money will come from, but I don't expect that they'll come from the MAC. As well, FAA has to be reimbursed because MAC has accepted money as part of the grant process. So I don't imagine that the township supervisors would be too happy having to tell their constituents that we have to raise your taxes to buy out the airport. I don't know if that's even feasible; however, that's my thinking.	Comment noted.
4/4/2018	John	Krack	Public Hearing - Verbal	16B	The other solution is to just pave the runway as it is. Some of the concerns -- I guess the main concern I've heard is the rerouting of Highway 30, and I do know that MAC has taken several stabs at trying to come up with a compromise to that. They've engaged with the Community Engagement Panel and they've ruled out the other approach that they had, which removed the double curve, so I don't see any other solution other than buying a lot of land. So I feel that MAC, in that case, has done a fair job of listening to constituents and coming up with a solution,	Comment noted.

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					given the other objectives that they're trying to achieve, so I think MAC has listened.	
4/4/2018	John	Krack	Public Hearing - Verbal	16C	The process itself -- I follow this for Lake Elmo, for Crystal, and tangentially for Airlake -- this is by far and away the most transparent and the most thorough planning process that I've ever seen regarding long-term comp plans, and some of the other ones have been very -- almost this is what we want to do and, you know, we'll take some input but we ignore it. In this case, this input hasn't been ignored. They've made at least two revisions to the Lake Elmo plan, they've made several revisions to the Crystal plan, all based on constituent and stakeholder input. So I applaud that process, I applaud the dedication that MAC has taken and, yeah, it costs more money, \$700,000 for how many iterations on this thing. It would have been a lot cheaper if you had gone with the first one.	Comment noted.
4/4/2018	John	Krack	Public Hearing - Verbal	16D	But at the end of the day MAC is tasked with, by the legislature, with managing these airports to the benefit of the transportation system, the benefit of the users, and to try to reach reasonable compromises with communities, and you have to make a decision, and I believe that the extension of the runway is a definite safety factor. You're able to do it without expanding the noise contours,	Comment noted.
4/4/2018	John	Krack	Public Hearing - Verbal	16E	you're able to keep the runway safety zones entirely within MAC property, and I think that's pretty good, pretty good results of -- if you reference to this.	Under the preferred alternative, the runway protection zones (RPZs) would be entirely inside the fence and on MAC-owned property. The State of Minnesota Model Safety Zones would extend beyond Airport property, as discussed in EA/EAW Sections 3.3 and 5.9.1.
4/4/2018	John	Krack	Public Hearing - Verbal	16F	Do we need 3,500 feet? As others have said, it is definitely a safety factor. Maybe on dry pavement on a medium-temperature summer day, 2,800 is fine. But you get a hot summer day with no wind, airplanes don't	Comment noted. See also Appendix A of the EA/EAW for runway length discussion.

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					perform as well, they don't climb as well, it takes longer to get off the ground, or you have a rainy, slippery surface, it takes longer to land or you have a rusty pilot that floats halfway down the runway before he touches down, and that extra 6 or 700 feet can be the difference between someone running off the end and being able to get his aircraft stopped.	
<b>4/4/2018</b>	<b>John</b>	<b>Krack</b>	<b>Public Hearing - Verbal</b>	<b>16G</b>	So I guess in closing I would say that I commend what MAC is doing. I think this is a situation where some -- we can't please everybody, and I think we've entrusted MAC, the legislature has entrusted MAC with the operation of these airports and I support going forward with the plan.	Comment noted.
<b>4/4/2018</b>	<b>Susan</b>	<b>Dunn</b>	<b>Public Hearing - Written</b>	<b>17A</b>	Preserve & maintain current use and configuration of Lake Elmo Airport	See General Comment Response C(iii)
<b>4/4/2018</b>	<b>Susan</b>	<b>Dunn</b>	<b>Public Hearing - Written</b>	<b>17B</b>	Funds to New Richmond airport \$11.5 million	See General Comment Response C(i)
<b>4/4/2018</b>	<b>Susan</b>	<b>Dunn</b>	<b>Public Hearing - Written</b>	<b>17C</b>	City Comprehensive Plan of Lake Elmo has safety zones that were recently eliminated to aid the developments like Easton Village & other developments in surrounding areas.	See General Comment Response F(ii)
<b>4/4/2018</b>	<b>Susan</b>	<b>Dunn</b>	<b>Public Hearing - Written</b>	<b>17D</b>	MAC asked Lake Elmo not to have high density development near the airport, but MAC was ignored and Lake Elmo did what they wanted for the developer	See General Comment Response F(ii)
<b>4/4/2018</b>	<b>Susan</b>	<b>Dunn</b>	<b>Public Hearing - Written</b>	<b>17E</b>	# of aircraft at Lake Elmo Airport continues to decrease to 183	See General Comment Response J(iv)
<b>4/4/2018</b>	<b>Susan</b>	<b>Dunn</b>	<b>Public Hearing - Written</b>	<b>17F</b>	Do not fill in wetlands, they recharge the aquifer.	See General Comment Response N
<b>4/4/2018</b>	<b>Susan</b>	<b>Dunn</b>	<b>Public Hearing - Written</b>	<b>17G</b>	Disrupting and removing the woodlands is yet another assault on the environment, noise very disruptive	See General Comment Response D, M(i), and M(ii)
<b>4/4/2018</b>	<b>Susan</b>	<b>Dunn</b>	<b>Public Hearing - Written</b>	<b>17H</b>	Road realignment, not	See General Comment Response B

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4/4/2018	Susan	Dunn	Public Hearing - Written	17I	How can wetlands be moved to another part of the state and still be beneficial to Washington County?	As noted in Section 5.14.1 of the Draft EA/EAW, the MAC will consider wetland banking opportunities during the permitting process according to the wetland replacement priorities defined in the Wetland Conservation Act (WCA) statute, which prioritizes wetland replacement in the following order: minor watershed, then major watershed, then bank service area. For more information on federal and state regulations related to wetlands, see <a href="http://www.bwsr.state.mn.us/wetlands/">http://www.bwsr.state.mn.us/wetlands/</a> .
4/4/2018	Susan	Dunn	Public Hearing - Written	17J	A full EIS must be done if residents ignored	See General Comment Response T
4/4/2018	Susan	Dunn	Public Hearing - Written	17K	I support our airport & do not want it to close.	Comment noted.
4/4/2018	Scott	O'Connor	Public Hearing - Written	18A	As a pilot and tenant hangar owner at 21D, I am firmly in support of the 21D improvement plan. Most important is the increased safety this will provide to pilots and neighbors. As a result of the improvement I do not plan to fly "more" from 21D, but I will be able to fly "more safely."	Comment noted.
4/4/2018	Scott	O'Connor	Public Hearing - Written	18B	21D serves an important role in the east metro and in the MAC reliever airport system. It is advantageous to everyone to make it as safe as possible.	Comment noted.
4/4/2018	Janel	Surgenor	Public Hearing - Written	19A	I object to the proposal.	Comment noted.
4/4/2018	Janel	Surgenor	Public Hearing - Written	19B	I live in Easton Village and the noise currently is unbearable.	See General Comment Response D
4/4/2018	Janel	Surgenor	Public Hearing - Written	19C	With the expansion there will be more planes and more noise. The MAC states the noise will be minimal. However, MAC, FAA, and the pilots don't live in Easton Village and will not have to live with the noise.	See General Comment Response D
4/4/2018	Janel	Surgenor	Public Hearing - Written	19D	I highly doubt the MAC will fund the surrounding neighborhoods with new noise reduction windows.	See General Comment Response S



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4/4/2018	Janel	Surgenor	Public Hearing - Written	19E	I believe MAC is lying about the fact that there will not be bigger planes.	See General Comment Response A(i)
4/4/2018	Janel	Surgenor	Public Hearing - Written	19F	I am also concerned about the loss of land, trees, and water areas.	See General Comment Response L(i), M(i), and N
4/4/2018	Janel	Surgenor	Public Hearing - Written	19G	I feel the neighbors close to 30th Street will have the new road and expansion in their backyard.	See General Comment Response B(ii)
4/4/2018	Janel	Surgenor	Public Hearing - Written	19H	Lastly, I am concerned with the safety of me, and family. There is a potential of a plane crash in my neighborhood	See General Comment Response F(v)
4/4/2018	Janel	Surgenor	Public Hearing - Written	19I	Increase of traffic on Manning Ave that would cause traffic accidents and car-pedestrian accidents	See General Comment Response B(i)
4/18/2018	John	Regenold	Mail	20A	I was at the April 4, 2018 hearing and totally agree with the improvements for Lake Elmo Airport. Longer runways - better lighting etc. I also own a hangar at Lake Elmo and fly from that airport on a regular basis.	Comment noted.
4/18/2018	Raymond	Lucksinger	Mail	21A	I have lived all my life (75 years) at this address, took flying lessons at the airport, was a member of the civil air patrol and the commorative air force at Fleming Field.	Comment noted.
4/18/2018	Raymond	Lucksinger	Mail	21B	I believe MAC is doing a very good job of running the airports and am for the preferred alternative plan.	Comment noted.
4/18/2018	Raymond	Lucksinger	Mail	21C	People say it will devalue homes, if this is true (why) are they building homes next to the airport selling for 350,000 to 400,000 and they are selling, if people don't like airport (why) are they buying then.	See General Comment Response K
4/18/2018	Susan	Markgraf	Mail	22A	I've lived in Lake Elmo all my life, I enjoy seeing the planes, we stop over and watch the planes take off and land. MAC is doing a good job taking care of the airports. I'd like to see the money stay here in Lake Elmo Airport and not in Wisconsin.	Comment noted.
4/5/2018	Wade	Rastall	Mail	23A	MACs proposal for airport expansion includes either a shutting down or a major rerouting of 30th street between Manning and Neal Ave. Proposed road will go from 55 MPH to 30 MPH, slowing commutes and	See General Comment Response B(i)

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					possible access for emergency services. It may also force daily commuter traffic through my neighborhood.	
4/5/2018	Wade	Rastall	Mail	23B	Potential for ground water contamination in our wells, due to disruption of current watershed.	See General Comment Response N
4/5/2018	Wade	Rastall	Mail	23C	20 acres of trees and natural habitat, which now protect residents from wind, light and noise pollution will be removed and replaced with extended, lighted runways which will be lit 24 hours a day, 7 days a week with the addition of added strobes to the crosswinds.	See General Comment Response M(ii) and E
4/5/2018	Wade	Rastall	Mail	23D	Extended runways are being proposed without zoning, which puts pilots and residents at risk.	See General Comment Response F(ii)
4/5/2018	Wade	Rastall	Mail	23E	Extended runway will cost \$11.5 million and is not warranted given current usage of the airport; operations, based aircraft, and continuing decline of pilots	See General Comment Response J(iv)
4/5/2018	Wade	Rastall	Mail	23F	Downtown St. Paul and New Richmond should be considered as alternatives.	See General Comment Response C(i) and C(ii)
4/5/2018	Wade	Rastall	Mail	23G	Longer runways mean larger/noisier planes. I already have planes flying low over my house, I don't want more.	See General Comment Response A(i) and D
4/5/2018	Wade	Rastall	Mail	23H	I moved to this area from Woodbury and paid more for my home and lot so I could get more privacy and a country environment. I pay over \$6K/year in property taxes for this attribute and do not wish to see the area deteriorate any further.	See General Comment Response G
4/11/2018	Susan	Dunn	Mail	24A	I attended the April 4, 2018 proposed Lake Elmo Airport Expansion meeting and oppose the expansion.	Comment noted.
4/11/2018	Susan	Dunn	Mail	24B	[I] do support maintaining the existing footprint.	See General Comment Response C(iii)
4/11/2018	Susan	Dunn	Mail	24C	After the meeting I went home and reviewed the Long Term Comprehensive Plan for Lake Elmo Airport (21D) June 2008. Chapter 1 "The activity at the Lake Elmo Airport has been declining." Chapter 2 "The number of based aircraft is expected to increase from 236 in 2005, 291 in 2010, to 312 in 2025" (The number mentioned at the airport April 4,	As noted in Draft EA/EAW Chapter 4, there were 192 aircraft based at Lake Elmo Airport in 2016, 183 of which were single-engine aircraft. The 2008 LTCP referenced by this comment does not reflect aircraft currently based at the Airport, nor does it reflect the more current based aircraft forecast from the recently-completed

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					2018 was 183.)"micro jet operation is projected by 2025"	LTCP. See also General Comment Response J(iv).
4/11/2018	Susan	Dunn	Mail	24D	Please consider the New Richmond option as presented 4/4/2018.	See General Comment Response C(i)
4/11/2018	Susan	Dunn	Mail	24E	The Lake Elmo Airport opened in 1951 and since that time the cities and township have evolved around the site, making any expansion intrusive, environmentally insensitive, and not conducive to this residential area.	See General Comment Response F(iv)
4/19/2018	Ronald	Fredkove	Mail	25A	I'm a resident of Baytown since 1977-41 years and on the town board since 1989-29 years. I've enjoyed the airport and flying out of it with friends that have planes there. I thank you for all the work you are doing. I'm for having a safer airport because there is a lot of growth- houses going on in our community and surrounding communities. I don't understand why people are moving in next to the airport & railroad tracks and then complaining.	See General Comment Response F(iv)
4/19/2018	Ronald	Fredkove	Mail	25B	I'm all for redoing 30th St for the expansion of the runway.	Comment noted.
4/2/2018	Susan	Winsor	Email	26A	I very much oppose expanding the Lake Elmo airport.	Comment noted.
4/2/2018	Susan	Winsor	Email	26B	[agrees with] the points made in today's Pioneer Press article	See General Comment Response J(iv)
4/2/2018	Susan	Winsor	Email	26C	I am sick and tired of airplane noise! We live in Afton in the flight path from that airport and never thought we would have so much noise! These relatively small planes fly quite low and ruin our peaceful tranquil setting. So much of this traffic appears to be recreational flying- on nice summer days when you're outdoors trying to enjoy nature. The main reason we live in Afton was to escape airplane noise from the Twin Cities 20 years ago!!! I was surprised that noise was not included in that article as a consideration.	See General Comment Response D
4/2/2018	Susan	Winsor	Email	26D	How fair is it that all the people who have to tolerate that noise do not benefit a whit from the airport!?!?!?! All of the Washington County surveys asking people why they live	See General Comment Response G

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					here is for an appreciation of nature and a peaceful lifestyle. I honestly do not understand why a commercial venture such as an airport should have such a BROAD impact that extends miles beyond what most people think of— the immediate Lake Elmo airport neighborhood.	
<b>4/2/2018</b>	<b>Susan</b>	<b>Winsor</b>	<b>Email</b>	<b>26E</b>	Please do not expand this airport, it's not needed given that Holman field is under used (recent Pioneer Press article said this), so we do not need any more metro area "relief."	See General Comment Response C(ii)
<b>4/5/2018</b>	<b>Steve</b>	<b>Johnson</b>	<b>Email</b>	<b>27A</b>	Thank you for the opportunity to review/comment on the EA/EAW for the Runway 14/32 Relocation/Extension and Associated Improvements at Lake Elmo Airport. I live at 13595 Greenwood Trail, West Lakeland Township, approximately two miles southeast of the end of the runway. I experience light to moderate noise impacts from aircraft, particularly when taking off. It is most noticeable on weekends in warm-weather months, when my windows are open and recreation flights are most common. I do not expect significant changes to that experience at my residence as a result of this project.	See General Comment Response D
<b>4/5/2018</b>	<b>Steve</b>	<b>Johnson</b>	<b>Email</b>	<b>27B</b>	I support the aspect of the project that proposes developing 27.5 acres of tall-grass prairie habitat on the airport property. This will benefit a number of pollinators, including the rusty patched bumble bee. I also support efforts to avoid/minimize impacts to Blandings turtles, as described in the EA/EAW and appendices.	Comment noted.
<b>4/5/2018</b>	<b>Steve</b>	<b>Johnson</b>	<b>Email</b>	<b>27C</b>	Appendix B discusses vehicle traffic on 30th Street but does not mention pedestrian/bicycle traffic. 30th Street between Neal and Manning avenues is frequently used by joggers and bicyclists on longer duration trips, since it is one of only a few ways out of the residential areas to the east and southeast, especially heading toward Lake Elmo or Lake Elmo Park	The realigned segment of 30th Street North will be designed in accordance with the most restrictive applicable township standards, which require eight-foot gravel shoulders for a minor collector road. This shoulder width represents an improvement over the existing condition and would allow more space for motorists, pedestrians, and bicyclists. Reconstruction of the segment



<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					Reserve to the west. 30th Street currently has no shoulders and when bicyclists or joggers encounter cars they are often required to step off into the ditch to avoid being struck. In addition, impacts to pedestrians/bicyclists can be mitigated by construction of eight-foot blacktop shoulders. Appendix B mentions eight-foot shoulders, but does not make clear if they will be bituminous or gravel.	of 30th Street between the realigned section and Manning Avenue is not part of the proposed action, as it is not directly affected by the proposed improvements at the Airport.
4/5/2018	Steve	Johnson	Email	27D	The safety issue is significant, and added to that is the presence in the road ditch of an extensive infestation of wild parsnip ( <i>Pastinaca sativa</i> ) which is particularly noxious for human physical contact. The EA/EAW's discussion of invasive plants doesn't mention wild parsnip, and should. Care will be needed to eradicate it and prevent its spread when constructing the planned improvements.	Measures to control introduction and spread of invasive species are discussed in Section 5.2.1. Appropriate measures would be used for the wild parsnip, among other species.
4/5/2018	Steve	Johnson	Email	27E	(The half-mile of 30th Street between the project and Manning Avenue is in poor condition and should be rebuilt soon; while not part of this project, it should also contain eight-foot asphalt shoulders.) Establishing shoulders on this road is important for the safety of nonmotorized users, considering the vehicle traffic of 1,500 per day (and expected growth to 2,000 by 2030.	See response to 27C
4/5/2018	Jonathan	Schmelz	Email	28A	I am a resident of Lake Elmo and have resided at 24th St N and Legion Ave N since 1998. This is approximately 6000 Feet off of the departure end of Runway 22 (about a mile). I have been following the proposed Improvements to the Lake Elmo Airport for over a year now, and want to publicly voice my support of the proposed Airport Improvements.	Comment noted.
4/5/2018	Jonathan	Schmelz	Email	28B	In 1998 I was not a pilot nor had any involvement with the airport community. The airport traffic has never been an irritation for me or my family. In fact we have always enjoyed being in our back yard and watching	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					the aircraft fly over. I have never heard any of my neighbors complain about the aircraft that fly overhead at less than 1000 Feet. The noise pollution and shaking windows that we complain about to each other originate from the Railroad traffic that runs east and west just north of the airport and through downtown Lake Elmo. Additionally, the train whistles in the middle of the night at the road crossings can be heard for miles.	
4/5/2018	Jonathan	Schmelz	Email	28C	In 2005 I visited the airport for the first time since living in Lake Elmo and took an introductory flight from Valter's Aviation on one of their Open House days. After that I pursued my Pilot's License and have since owned 2 Aircraft that were based at the Lake Elmo Airport for more than 10 Years. The first being a Piper Saratoga TC 6 Cylinder Piston Airplane, and the second being a Daher TBM850 Turbine Airplane. Without the airport being less than a mile from my home, and being a long-standing part of the Lake Elmo area, I would never have pursued this life path. THE LAKE ELMO AIRPORT HAD A DIRECT IMPACT ON ME BECOMING AN AVIATOR.	Comment noted.
4/5/2018	Jonathan	Schmelz	Email	28D	After listening to the opposition comments on this project from fellow residents, I have repeatedly heard from many that they do not oppose the airport itself or replacing the runway because of its deteriorating condition. I have however heard opposition to the runway length increasing for fear that this will encourage a new type of aircraft using the airport and therefore increasing the noise pollution for the residents. I want to publicly comment as both a turbine and piston pilot user of the Lake Elmo Airport that the additional runway length WILL NOT CHANGE the aircraft type that use the Lake Elmo Airport. I believe you would need at least a 5000-foot runway to attract the next	See General Comment Response A(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					class of aircraft; your proposal is only 3500 feet.	
4/5/2018	Jonathan	Schmelz	Email	28E	I also want to convey that the Turbine powered TBM needs less runway length to operate than the piston powered Saratoga due to increased power for takeoff performance and the ability to reverse the prop on landing. The majority of aircraft currently using Lake Elmo (which most residents do not oppose the current activity) are similar to the Saratoga – not the TBM, therefore the increased runway length benefit the current users more than the heavier Turbine aircraft that can currently safely use the airport.	See General Comment Response A(i)
4/5/2018	Jonathan	Schmelz	Email	28F	I believe the increased runway length is NECESSARY FOR PILOT AND GROUND SAFETY FOR THE CURRENT GROUP OF USERS. First, the RPZ would then be contained within the airport and not extend over Manning Avenue or the Railroad track to the north, or over 30th Street to the South. Secondly, I have personally experienced times that I have not been able to come home to Lake Elmo because the runway was contaminated with snow or patchy ice, therefore increasing landing distance beyond my comfort for the current runway length. A 3500 Foot Runway would have been acceptable an acceptable length. Attempts to land under those conditions or misjudgment by a pilot could result in adverse consequences. I do not believe I am the only user to experience this. Lastly, other factors are mitigated by longer runway length that improve safety of the pilot and community such as night landing illusions, and pilots approaching at too high of an airspeed; therefore floating too far past the touchdown zone.	Comment noted.
4/5/2018	Jonathan	Schmelz	Email	28G	Lastly, although I personally preferred other alternatives to the Lake Elmo Airport Improvement, I wholly support the latest	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					option that the Metropolitan Airports Commission has proposed. I support it fully because of the process that has been taken to consider all stakeholders inputs to the project and the revisions that were made as a compromise in order to accommodate the feedback received.	
4/4/2018	Rod	Ough	Email	29A	I have just come back from the Public Hearing held at the Oak-Land Middle School and wanted to comment on what I heard. 1. I am a pilot. 2. I am in favor of the planned Lake Elmo project. It is needed for the safety of the pilots and those living nearby.	Comment noted.
4/4/2018	Rod	Ough	Email	29B	I understood the primary concern was the noise. The adjustment to the plan has eliminated much or all of that.	See General Comment Response D
4/4/2018	Rod	Ough	Email	29C	Most people do not want the airport, road etc due to change. I understand that. I moved into my Woodbury home surround by corn fields. The following year, they were replaced by houses. We didn't like that but change will happen. Things can not stay the same, even if we want them too.	Comment noted.
4/4/2018	Rod	Ough	Email	29D	People forget the advantage of having an airport nearby. Civil Air Patrol encourage kids to take up flying or get into science and engineering (much needed). Every summer the EAA take up kids and let them fly the plane to encourage them to fly (free of charge). They also provide ground school for future pilots. None if that would happen if there was no airport. Let's not forget that the airport also supports other businesses nearby the airport	Comment noted.
4/4/2018	Rod	Ough	Email	29E	I am 6 miles and 10 min from 21D. New Richmond is 30 miles and 40 min away (in good weather). I almost laugh when New Richmond airport guy talked. Yea, Lake Elmo does not need it, give it to New Richmond. By the way, send all of the planes and business to New Richmond, WI too.	See General Comment Response C(i)



Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/4/2018	Rod	Ough	Email	29F	Go to St Paul airport. Control tower. Jets. Controls airspace. Time/cost to fly out of cities.	See General Comment Response C(ii)
4/4/2018	Rod	Ough	Email	29G	p.s. As for the comment about taking up to 55 min to get to MSP. I have lived in Woodbury for 20 years and it has taken me over an hour to drive to MSP (in good weather) in rush hour. I plan for 35-40 min in good weather and low traffic conditions.	See General Comment Response C(v)
4/4/2018	Diane	McGann	Email	30A	I encourage your opposition to the expansion of the Lake Elmo airport.	Comment noted.
4/4/2018	Diane	McGann	Email	30B	It is located in the middle of residential neighborhoods	See General Comment Response F(ii)
4/4/2018	Diane	McGann	Email	30C	is within 15 miles of two other major airports.	See General Comment Response C
4/4/2018	Diane	McGann	Email	30D	The airport is home to several pilots-in-training who fly at low altitudes over homes in the area.	See General Comment Response Q
4/4/2018	Diane	McGann	Email	30E	I urge demolition of this airport, rather than expansion, and encourage your resistance to the expansion plan.	See General Comment Response C(iv)
4/6/2018	Dave	Becker	Email	31A	I am writing in full support of the current plan to improve safety at Lake Elmo airport by relocating and extending the 14-32 runway and other improvements associated with the plan.	Comment noted.
4/6/2018	Dave	Becker	Email	31B	As a pilot located at Lake Elmo for over 20 years, these improvements have been in the planning stage for about as long as I have been flying at Lake Elmo with many concessions made to help satisfy the well organized opposition group who are fighting the plans.	See General Comment Response I(i)
4/6/2018	Dave	Becker	Email	31C	As a public reliever airport for the greater Twin Cities area, the Lake Elmo airport has upheld its obligation and service to the community for a long time. I want the MAC to ensure that this airport remains a valuable service to pilots and the community by following through and making these proposed safety improvements.	Comment noted.
4/7/2018	Eric	Lobner	Email	32A	My name is Eric Lobner, I am a pilot and member of a flying club located at Lake Elmo airport. I am writing to you to voice my vote	Comment noted.

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					of support for the proposed changes to 21D as a part of the long-term comprehensive plan for the airport.	
4/7/2018	Eric	Lobner	Email	32B	I would like to start off by thanking you and your fellow MAC representatives for the work that you do to keep 21D the wonderful airport it is. I have read through the comprehensive plan, the environmental assessments and many of the other documents on the process that has been followed as a part of the proposed upgrades at 21D and have made several conclusions. First and foremost, I believe that the process you are following is fair for all parties involved, especially in the way that input is solicited, documented and incorporated into finalization of the plan.	See General Comment Response I(i)
4/7/2018	Eric	Lobner	Email	32C	The second conclusion is that the proposed upgrade is necessary to support continued operations at 21D. While many of us enjoy the challenge of landing on the scant 2800' for 14/32, I think we all would agree that adding a few hundred extra feet would add an extra margin of safety that would benefit all. The improved lighting and approaches will also be helpful for improving safety for particularly dangerous conditions when flying at night or in instrument conditions. I think that this reason alone should be enough to approve the proposed project.	Comment noted.
4/7/2018	Eric	Lobner	Email	32D	I am concerned about the amount of mis-information being spread by those that oppose the project. We in the aviation community know that many of the concerns about dramatically increased usage, larger class aircraft, intolerable light pollution and the potential for additional accidents are largely unfounded fears. I again appreciate you and your colleagues for hosting public forums to educate the public on these issues.	See General Comment Response I(iii)
4/7/2018	Eric	Lobner	Email	32E	Lake Elmo airport has been a critical part of the transportation infrastructure and economic driver of the East metro area since the 1950's. I'm proud to be a pilot based at	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					21D and voice my support for the proposed modifications to Lake Elmo.	
4/15/2018	Elizabeth	Buckingham	Email	33A	It is very disturbing to me that you, in good conscience, will intentionally remove 20 acres of woodlands, some historic trees, on MAC property at the Lake Elmo Airport and its neighbors in Baytown Township and West Lakeland Township.	See General Comment Response L(i) and M(i)
4/15/2018	Elizabeth	Buckingham	Email	33B	Since MAC is a State agency, it should encompass what another state agency, the Minnesota State Lottery mission is: "Restore, enhance and protect high-quality habitat for Minnesota wildlife, fight invasive species, protect native species and improve air and water quality." Why does MAC conflict a sister Agency?	The MAC is not a state agency. See also General Comment Response I(ii)
4/15/2018	Elizabeth	Buckingham	Email	33C	Like Rachel Carson explains in her profound book Silent Spring--we need to protect wildlife habitats for not only our generation, but future generations. By senselessly removing woodlands, you not only kill, but also endanger wildlife habitats along with harming mankind with more winds, noise pollution, light pollution and put at risk neighbors with larger aircraft.	See General Comment Response L(i)
4/15/2018	Elizabeth	Buckingham	Email	33D	The pilots should pay for any and all improvements designated by MAC because, after all, it's the pilots' Country Club.	See General Comment Response J(iii)
4/15/2018	Elizabeth	Buckingham	Email	33E	PS. I expect a personal written reply from MAC.	See General Comment Response U
4/14/2018	Elizabeth	Buckingham	Email	34A	I live in Baytown Township a short distance east of the Lake Elmo Airport. I am concerned about the Endangered Species Rusty Patched Bumble Bee ("RPBB") habitat on MAC property. I've learned from the U of MN Bee Laboratory that it has confirmed RPBB's habitat at the Lake Elmo Park Reserve (LEPR). I have seen them on my property also. MAC's property lies squarely between the LEPR and my property. Shame on you MAC, you should respect life in all forms and not intentionally destroy it with deliberate careless actions.	See General Comment Response L(ii)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/14/2018	Elizabeth	Buckingham	Email	34B	[21D] was built in 1951 and MAC's outdated expansion plan is from 1965 and has been abandoned previously.	See General Comment Response H
4/14/2018	Elizabeth	Buckingham	Email	34C	Pilots knew the length of the runways when they decided to hangar at Lake Elmo Airport. Holman Field and New Richmond, Wisconsin airports are close enough for pilots to use because of excellent freeway systems. The St Croix River Crossing Bridge opened in August last year and it's an easy drive to New Richmond. We know Holman Field in downtown St Paul is also an easy drive.	See General Comment Response C(i) and C(ii)
4/14/2018	Elizabeth	Buckingham	Email	34D	PS. I Expect a personal written reply from MAC.	See General Comment Response U
4/14/2018	Norman	Jones	Email	35A	I'm writing in favor of the proposed improvements to the Lake Elmo airport.	Comment noted.
4/14/2018	Norman	Jones	Email	35B	As new pilots and hangar owners, my wife and I have become more and more dependent on being able to get in and out of Lake Elmo airport to do business and to be available for family medical issues out of town. The plane is a lifeline for me and my family	Comment noted.
4/14/2018	Norman	Jones	Email	35C	I worry sometimes with the runway length, leaving little margin of safety for failure, weather, miscalculation, or mechanical issue.	Comment noted.
4/14/2018	Norman	Jones	Email	35D	Continuing to have the shortest paved runway around would not be safe in the long run. The runway extension is really a great idea, just in the nick of time, I'd say. It seems to me that pilot training at Lake Elmo is on the rise (younger pilots), an older generation of pilots is still flying, and GA planes are generally an aging fleet. Some of that could spell more dangerous operations in Lake Elmo without a little more margin of safety. I feel that you've included items that are well chosen. Since you are trying to keep pilots, passengers, and indirectly, folks on the ground, safer, you have my thanks for what you are doing. What you are doing is the air equivalent of what a city does on the ground when an intersection gets busier or	Comment noted.



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					<p>more dangerous and they update a stop sign to a stop light. People tend to think of the slight inconvenience added and ignore the safety improvement for everyone. Thank goodness someone with a view to the general good is making those decisions. It seems to me that the airport improvements are similar. It's a temptation for people to focus on their own inconvenience, especially when the safety benefits are perceived to be for SOMEONE ELSE. As a "someone else", I'm glad you are there making decisions for the general good.</p>	
4/15/2018	Ben	Ross	Email	36A	<p>I submitted four questions on 8/2/15. Three received a response in my review of the FAQs. However, my 4th question did not. It was/is related to root cause analysis showing the runway length at Lake Elmo was the cause of any incidents that have occurred. Given my simple question, as the NTSB would investigate all incidents, I have to assume that there are zero incidents showing runway length being the root cause due to lack of response.</p>	<p>The NTSB database contains 15 aircraft accidents associated with aircraft operating at Lake Elmo Airport between 1983 and 2010. It is difficult to fully know all of the contributing factors leading to an aircraft accident. While runway length is not listed as the probable cause in the accidents in the vicinity of Lake Elmo, the accident records do not contain enough information to determine if the availability of a longer primary runway could have changed the outcome in one or more of these accidents.</p>
4/15/2018	Ben	Ross	Email	36B	<p>At the hearing on 4/4/18 we heard from some pilots. Their main message is that it is inconvenient for them and their hobby to have the airport exist as is. Just as we homeowners chose to build where we did those same pilots chose to house their aircraft where they did. This project is serving hobbies of pilots who have options rather than the homeowners who built here (West Lakeland, Bayport Township, Lake Elmo).</p>	<p>See General Comment Response J(iii)</p>
4/15/2018	Ben	Ross	Email	36C	<p>If the airport doesn't meet their needs they can go elsewhere, for example River Falls.</p>	<p>See General Comment Response C</p>
4/15/2018	Helen	Kernik	Email	37A	<p>I have friends that live just off 30th Street east of the Lake Elmo Airport. Driving to their home during winter can be a terrifying experience because of the snow and ice conditions on 30th street. The proposed</p>	<p>See General Comment Response B(i)</p>

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					reconfiguration of 30th street will greatly reduce traffic safety in this area. This proposal should be rejected.	
4/14/2018	Pete	Widin	Email	38A	I am a lifelong resident of Lake Elmo and an ecologist and landscape architect. I oppose the expansion of the Lake Elmo Airport for the following reasons.. 1) It is not a necessary transportation hub for the area	See General Comment Response J(i)
4/14/2018	Pete	Widin	Email	38B	2) The expansion will resuspend sediments and potential TCE's which are already a problem for our local water sources. Water quality is crucial to the livability of our area.	See General Comment Response N
4/14/2018	Pete	Widin	Email	38C	3) There will be important wetlands and natural habitat removed and by the expansion - our local economy depends quite a bit on local recreation for waterfowl hunting, birdwatching etc.	See General Comment Response L(i)
4/14/2018	Pete	Widin	Email	38D	4) There are now neighborhoods right across the street from the airport which will be a constant source of complaints and safety/nuisance issues	See General Comment Response F(iv)
4/6/2018	Derek	Gilbert	Email	39A	I support the MAC's Long-Term Comprehensive plan and would like to see us complete the project. I agreed with Mr. Wenck's observation, that the airport was in existence prior to every speaker that opposed the project that spoke at the meeting. There a few if any people in the immediate area that were living in their homes before the airport was built. I also noticed that not only had the opponents that spoke bought or built after the airport existed, but after the 1966 Long-Term Comprehensive Plan had been created as well. The current proposal calls for reduced runway lengths than the original plans due in part to accommodating the concerns of neighbors. Mr. Wenck also gave some statistical data about neighboring population and the very low percentage of that population that is expressing opposition to the project. His data showed that the	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					opposition that was in attendance was approximately 1% of the 11,000 plus population in the affected townships.	
4/6/2018	Derek	Gilbert	Email	39B	The plan calls for solid fencing to help shield the runway approach lighting, if neighbors disapprove of the solid fencing, perhaps some bushes and more natural vegetation can be planted in these areas to create a more natural and aesthetic barrier.	The MAC will consider reasonable light shielding measures that do not conflict with Airport operations, which may include planting of vegetation buffers that do not have the potential to present aeronautical hazards. Actual light shielding options will be determined during project design.
4/6/2018	Derek	Gilbert	Email	39C	I am a resident of Hudson WI as well as own a business located in Hudson, I fly both for business and recreation. I looked at several locations before deciding where to fly out of. My top choice was Lake Elmo due to its geographical location to the east side of the twin cities.	Comment noted.
4/6/2018	Derek	Gilbert	Email	39D	New Richmond is not a convenient location and is in the opposite direction of where most businesses and passengers reside. St. Paul is also much further, and then forces me to deal with both roadway traffic	Comment Noted.
4/6/2018	Derek	Gilbert	Email	39E	[Downtown Saint Paul has] increased air traffic and larger planes, which create more hazards for small planes, as we also do for them.	See General Comment Response C(ii)
4/6/2018	Derek	Gilbert	Email	39F	The proposed runway length of 3500 feet does not accommodate larger aircraft, but rather increases safety for the planes already landing and departing from 21D.	Comment noted.
4/6/2018	Derek	Gilbert	Email	39G	The relocation of the airstrip, decreases noise, as the runway will be located a few hundred yards away from the new housing development across Manning Ave.	See General Comment Response D
4/6/2018	Derek	Gilbert	Email	39H	Noise of small airplanes is greatest during takeoffs, not landings, the longer airstrips will mean that my liftoff happens sooner along the airstrip therefore giving me more altitude when I pass over or near the neighboring homes, therefore reducing the noise levels that they experience.	See General Comment Response D
4/6/2018	Derek	Gilbert	Email	39I	In closing I have been impressed with the effort that MAC has put forth to listen to our	See General Comment Response I(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					neighbors and has made outstanding efforts to accommodate their concerns as best as possible. The plan has been altered to try to best balance airport needs and neighbor courtesy. Unfortunately no matter what efforts are taken, there are always some people that are unhappy. This is part of life and as long as due diligence has been taken to listen and attempt to minimize concerns of others, then progress needs to proceed. Many people were opposed to the New Hwy 36 bridge crossing, however more are enjoying the benefits that it has provided. Those benefits for many outweigh the inconveniences of a few; the same as the Lake Elmo Airport Improvements will.	
4/11/2018	Craig	Berggren	Email	40A	I would like Mac to quit saying expansion of 21D , it's a redevelopment within its property lines , no worse or better then remodeling a house	See General Comment Response I(iii)
4/11/2018	Craig	Berggren	Email	40B	being a pilot and hangar owner I would like to see more signage on taxiways and runways seeing How this a major airport for training.	The proposed action includes installation of appropriate signage on all runways and taxiways, in accordance with applicable FAA guidance.
4/11/2018	Craig	Berggren	Email	40C	Moving ahead with this redevelopment will insure that lake Elmo Airport is modernized for future use . Also keeping Lake Elmo airport a viable resource and staging area for the twin cities in case of a crisis heaven forbid .	Comment noted.
4/11/2018	Craig	Berggren	Email	40D	Moving ahead with this project will only make Lake Elmo Airport a more safer reliever airport for the twin cities .	Comment noted.
4/15/2018	Michelle	Rose	Email	41A	I am writing to express my strong support in favor of the MAC "No Action" plan in regards to not expanding the runways at the Lake Elmo Airport.	See General Comment Response C(iii)
4/15/2018	Michelle	Rose	Email	41B	Why I am against the runway expansion? As a resident who lives 1 mile away from the airport, the proposed runway expansion would put my house directly in the safety zone, which is terrifying to me and my two yo	See General Comment Response F(v)



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					ung children in case, God forbid, there was ever a crash.	
4/15/2018	Michelle	Rose	Email	41C	I am against the 30th street relocation - this is an expensive project that would result in ground water contamination, slowing down of traffic flow, and loss of natural wetlands.	See General Comment Responses B and N
4/15/2018	Michelle	Rose	Email	41D	My neighbors and I enjoy the small hobby planes that use the airport, but we are very much opposed to the added noise and disturbance that larger aircraft will bring.	See General Comment Response A(i)
4/15/2018	Michelle	Rose	Email	41E	There are other airports nearby (New Richmond, for example), that can handle larger aircraft.	See General Comment Response C(i)
4/15/2018	Karen	Baltzer	Email	42A	I have lived in West Lakeland for 13 years and I am asking you to STOP the proposed expansion of the Lake Elmo Airport for the following reasons:	Comment noted.
4/15/2018	Karen	Baltzer	Email	42B	Neighboring airports (Holman Field and New Richmond Regional) are underutilized. These airports provide convenient alternatives to the Lake Elmo Airport.	See General Comment Response C(i), C(ii), and J(iv)
4/15/2018	Karen	Baltzer	Email	42C	Quoting the March 31 Pioneer Press article about Holman Field, "it has had flights decrease from 118,000 in 2007 to 40,500 in 2017.	See General Comment Response J(iv)
4/15/2018	Karen	Baltzer	Email	42D	The New Richmond airport is also underutilized and is anxious to acquire the air traffic from Lake Elmo. It takes approximately 15 minutes to drive across our new \$650 million dollar bridge from the Lake Elmo Airport to the New Richmond Airport.	See General Comment Response C(i) and C(v)
4/15/2018	Karen	Baltzer	Email	42E	Why are "we" pouring \$11-14,000,000 into Lake Elmo airport, when these other nearby airports are open and underutilized?	See General Comment Response J(iv) and R
4/15/2018	Karen	Baltzer	Email	42F	The airport neighbors have accepted the hobby airport that is there now however we do not support making this into a business airport as MAC representatives have stated is their intent.	See General Comment Response A(ii)
4/15/2018	Karen	Baltzer	Email	42G	The realignment of 30th street will create a new traffic safety hazard on this very busy street. This street is a major thru-way for	See General Comment Response B(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					Baytown and West Lakeland. There are already plans to add turning lanes and traffic lights where 30th street joins Manning Avenue due to all of the traffic on 30th Street. 30th Street needs to stay in its current configuration as a straight road and also to stay intact where it joins Neal Ave and Manning Avenue for the safety of all of us who drive 30th Street every day.	
4/15/2018	Karen	Baltzer	Email	42H	In West Lakeland we have a 2.5 acre minimum lot size, so our ability to enjoy our yards is one of the primary reasons we live in West Lakeland. The expansion will undoubtedly bring in more and larger aircraft intruding on the peace and quiet of our neighborhoods.	See General Comment Response G
4/15/2018	Karen	Baltzer	Email	42I	No zoning has ever been done for this 'planned' Lake Elmo Airport expansion. [...] This lack of zoning puts residents and pilots at risk.	See General Comment Response F(iii)
4/15/2018	Karen	Baltzer	Email	42J	The neighborhoods surrounding the Lake Elmo Airport have been extensively built up over the last 20+ years and continue to do so.	See General Comment Response F(iv)
4/15/2018	Karen	Baltzer	Email	42K	Neighboring homeowners were not informed of this expansion 'plan' when we bought/built our homes.	See General Comment Response I(iii)
4/15/2018	Karen	Baltzer	Email	42L	The New Richmond Airport has had zoning in effect for over 25 years. People purchasing lots within three miles of the New Richmond Airport were required to sign an acknowledgement of the airport and agree not to complain about it or object to any and all changes(per Mike Demulling, New Richmond Regional Airport 715-246-7735).	As noted in Section 4.4.4, the Washington County zoning ordinance includes an Airport Overlay District applying to both public and private land. As of January 1, 2017, Washington County no longer exercises land use authority in West Lakeland Township except for administration of ordinances affecting shoreland management, mining, floodplains, subsurface sewage treatment systems, and Lower St. Croix River bluffland and shoreland. West Lakeland Township has adopted the Washington County Development Code or a version similar to the document.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						See also General Comment Response I(iii)
4/15/2018	Karen	Baltzer	Email	42M	There is significant potential for increased groundwater contamination in our wells due to the disruption of the current watershed with this project.	See General Comment Response N
4/15/2018	Karen	Baltzer	Email	42N	Please stop this needless waste of money that will create a new auto traffic safety hazard on 30th Street and intrude on our neighborhoods when there are safe, convenient alternatives available for the pilots that currently use the Lake Elmo Airport.	See General Comment Response B(i) and C
4/16/2018	Amy	Kaschmitter	Email	43A	I am writing to tell you I am opposed to the proposed moving and lengthening of the main runway in Lake Elmo.	Comment noted.
4/16/2018	Amy	Kaschmitter	Email	43B	I don't feel you have adequate remediation proposed for removal of the 20+ acres of trees	See General Comment Response M(i)
4/16/2018	Amy	Kaschmitter	Email	43C	I don't feel you have adequate remediation proposed for removal of 2.36 acres of wetlands.	See General Comment Response N
4/16/2018	Amy	Kaschmitter	Email	43D	The impacts to the neighbors will be unacceptable. Currently the trees add a buffer to light and noise pollution from the airport.	See General Comment Response M(ii)
4/16/2018	Amy	Kaschmitter	Email	43E	Also the impact of moving 30th Street North will bring the planes closer to established neighborhoods, increasing noise and safety concerns to residents.	See General Comment Response F(ii)
4/16/2018	Amy	Kaschmitter	Email	43F	Please change this plan and leave the runway in its current position.	See General Comment Response C(iii)
4/16/2018	Kathryn	Bach	Email	44A	I am opposed to runway expansion at Lake Elmo Airport for the following reasons:	Comment noted.
4/16/2018	Kathryn	Bach	Email	44B	the potential for further ground water contamination. Ground water and its preservation is essential to the continued health of our community.	See General Comment Response N
4/16/2018	Kathryn	Bach	Email	44C	loss of trees and natural habitat. The pollinator population, especially, depends on the natural habitat and wet lands in and around the Lake Elmo area.	See General Comment Response L(i)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/16/2018	Kathryn	Bach	Email	44D	loss of property value. Noise pollution, light pollution, and rerouting of roads will change the value of existing properties.	See General Comment Response K
4/16/2018	Kathryn	Bach	Email	44E	I am requesting that you acknowledge my concerns, reconsider your chosen options, and resolve to work with the resident and pilot communities to come to a reasonable and agreed upon solution toward the future of Lake Elmo Airport.	See General Comment Response I(i)
4/16/2018	James	Ulasich	Email	45A	Regarding the Lake Elmo Airport expansion that most people do not want, that would ruin our neighborhood	See General Comment Response G
4/16/2018	James	Ulasich	Email	45B	and would be financially irresponsible...Please listen to the people!	See General Comment Response J(i) and R
4/16/2018	James	Ulasich	Email	45C	We are in favor of the MAC "No Action" plan, which would allow the MAC to repair or rebuild the current runways in their current locations and at the current lengths.	See General Comment Response C(iii)
4/16/2018	James	Ulasich	Email	45D	We are asking the MAC to assume their responsibility as part of this community, in preserving our water resources and neighborhood. Below are many reasons not to move forward with an expansion of Lake Elmo Airport.	See General Comment Response I(ii)
4/16/2018	James	Ulasich	Email	45E	30th St relocation unsafe	See General Comment Response B(i)
4/16/2018	James	Ulasich	Email	45F	Further ground water contamination	See General Comment Response N
4/16/2018	James	Ulasich	Email	45G	Lack of Zoning	See General Comment Response F
4/16/2018	James	Ulasich	Email	45H	Major loss of property value	See General Comment Response K
4/16/2018	James	Ulasich	Email	45I	Larger aircraft are unwanted	See General Comment Response A(i)
4/16/2018	James	Ulasich	Email	45J	Loss and damage to wildlife	See General Comment Response L(i)
4/16/2018	James	Ulasich	Email	45K	Added noise and light pollution	See General Comment Response D and E
4/16/2018	James	Ulasich	Email	45L	Loss of trees and natural habitat	See General Comment Response L(i) and M(i)
4/16/2018	James	Ulasich	Email	45M	There are airports within 20 mi of Lk Elmo that are under-utilized that can accept the larger aircraft	See General Comment Response C
4/16/2018	James	Ulasich	Email	45N	New Richmond wants and welcomes this added traffic to their airport.	See General Comment Response C(i)
4/16/2018	James	Ulasich	Email	45O	The people from this area DO NOT want this expansion..... Just fix what is already there. Be sensible.....	See General Comment Response I(i) and C(iii)
4/16/2018	Laura	Kaschmitter	Email	46A	I am opposed to any expansion at the Lake Elmo Airport.	Comment noted.



Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/16/2018	Laura	Kaschmitter	Email	46B	I am very concerned about the recent issues with contaminated groundwater. You have stated in the EAW that our wells would not be affected by any construction done at the Lake Elmo Airport. Yet no evidence has been presented as to how this will be prevented.	See General Comment Response N
4/16/2018	Laura	Kaschmitter	Email	46C	If your plan does not work and our water becomes contaminated what is the plan to fix this? We are not on city water and sewer.	As noted in Appendix H to the Draft EA/EAW, the highest elevation of the contaminated aquifers is located at a depth more than 50 feet below the Airport ground surface elevation. Proposed project activities would not approach a depth that would encounter or disturb these aquifers.  See also General Comment Response N
4/16/2018	Laura	Kaschmitter	Email	46D	Also, I have always been confused by how the purpose and need of the MAC (unelected officials) is more important than the neighboring municipalities and their elected officials. Our elected officials represent many more people than the small number of pilots at the airport.	See General Comment Response I(ii)
4/16/2018	Laura	Kaschmitter	Email	46E	Please re-consider this plan and repair the runway in its current position.	See General Comment Response C(iii)
4/16/2018	Elizabeth	Buckingham	Email	47A	Now MAC calls its outdated 1965 plan at the Lake Elmo Airport an "improvement" not an "expansion". Why did MAC feel it necessary to rename its expansion? What's the difference? MAC, below are the word definitions. <u>Expansion</u> : the act of becoming larger or more extensive. <u>Improvement</u> : an example or instance of improving or being improved. There's NO question that MAC is expecting to do an "expansion".	See General Comment Response H  The MAC purchased land in the late 1960s and early 1970s to facilitate the airfield improvements being proposed. No additional land acquisition is planned as part of the proposed action.
4/16/2018	Elizabeth	Buckingham	Email	47B	Runways would be lengthened and re-positioned which means larger and more extensive--an improvement would be to resurface the existing runways.	See General Comment Response P
4/16/2018	Elizabeth	Buckingham	Email	47C	By the re-routing of 30th Street North with a sharp dangerous curve to lengthen runways would be significantly extensive--rebuilding a road is an expansion.	See General Comment Response B(i)

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4/16/2018	Elizabeth	Buckingham	Email	47D	Removal of 20 acres woodlands is certainly extensive--not a needed improvement.	See General Comment Response M(i)
4/16/2018	Elizabeth	Buckingham	Email	47E	It's time MAC steps up and tells the world it does not speak truthfully.	See General Comment Response I(iii)
4/16/2018	Elizabeth	Buckingham	Email	47F	PS. I Expect a personal written reply from MAC.	See General Comment Response U
4/15/2018	Richard	Weyrauch	Email	48A	While I do server on the Baytown Board of Supervisors, I am writing as a private citizen in the email that follows. This is NOT an official endorsement from Baytown Township.	Comment noted.
4/15/2018	Richard	Weyrauch	Email	48B	I have attended more than one public meeting over the proposed re-work of 21D, both prior to the EA/EAW meetings and for the EA/EAW meetings. While I support the proposed project, I even more so support the findings of the EA/EAW as I believe there will be minimal environmental impact to the local area as a result of this project.	Comment noted.
4/15/2018	Richard	Weyrauch	Email	48C	I am however concerned that most of the public comments I heard did not address the EA/EAW specifically, but instead seemed to focus on the general feelings about living near the airport. I cannot see how that should matter when considering the approval of the EA/EAW. I would hope the MAC board understands this too, and will vote to approve the EA/EAW based on the merits of the environmental impact.	Comment noted.
4/15/2018	Richard	Weyrauch	Email	48D	If personal opinions matter, then I must say that I feel that MAC did not place enough emphasis on the impact to the reconstruction of Manning Avenue if this project were to be postponed or canceled. Our community needs Manning avenue expanded at the earliest possible time; in fact, it's already too late in my humble opinion. The impact the current runway configuration has on delaying Manning Avenue's expansion is a large concern to our community. In the long run, everyone in this area of Washington County is better served by the approval of this	The relationship of the proposed action at the Airport and the planned widening of Manning Avenue is discussed in EA/EAW Section 2.2.2.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					project, and that is what I expect government to do for me.	
4/16/2018	Linda	Ulasich	Email	49A	Regarding the Lake Elmo Airport expansion that most people do not want, that would ruin our neighborhood	See General Comment Response G
4/16/2018	Linda	Ulasich	Email	49B	and would be financially irresponsible...Please listen to the people!	See General Comment Response J(i) and R
4/16/2018	Linda	Ulasich	Email	49C	We are in favor of the MAC "No Action" plan, which would allow the MAC to repair or rebuild the current runways in their current locations and at the current lengths.	See General Comment Response C(iii)
4/16/2018	Linda	Ulasich	Email	49D	We are asking the MAC to assume their responsibility as part of this community, in preserving our water resources and neighborhood. Below are many reasons not to move forward with an expansion of Lake Elmo Airport.	See General Comment Response I(ii)
4/16/2018	Linda	Ulasich	Email	49E	30th St relocation unsafe	See General Comment Response B(i)
4/16/2018	Linda	Ulasich	Email	49F	Further ground water contamination	See General Comment Response N
4/16/2018	Linda	Ulasich	Email	49G	Lack of Zoning	See General Comment Response F
4/16/2018	Linda	Ulasich	Email	49H	Major loss of property value	See General Comment Response K
4/16/2018	Linda	Ulasich	Email	49I	Larger aircraft are unwanted	See General Comment Response A(i)
4/16/2018	Linda	Ulasich	Email	49J	Loss and damage to wildlife	See General Comment Response L(i)
4/16/2018	Linda	Ulasich	Email	49K	Added noise and light pollution	See General Comment Response D and E
4/16/2018	Linda	Ulasich	Email	49L	Loss of trees and natural habitat	See General Comment Response L(i) and M(i)
4/16/2018	Linda	Ulasich	Email	49M	There are airports within 20 mi of Lk Elmo that are under-utilized that can accept the larger aircraft	See General Comment Response C
4/16/2018	Linda	Ulasich	Email	49N	New Richmond wants and welcomes this added traffic to their airport.	See General Comment Response C(i)
4/16/2018	Linda	Ulasich	Email	49O	The people from this area DO NOT want this expansion. Just fix what is already there.	See General Comment Response C(iii) and I(i)
4/16/2018	Scott	Hanson	Email	50A	I am a pilot and user of the Lake Elmo airport and support the enhancements and safety improvements being made to the airport grounds.	Comment noted.
4/16/2018	Scott	Hanson	Email	50B	I appreciate the update on the environmental assessment, and the reviews of the environmental areas potentially impacted. It looks comprehensive and thoroughly reviewed in all environmental areas.	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/16/2018	Scott	Hanson	Email	50C	I wish the improvements would have included the original longer runway and that the improvements would have been completed "yesterday"	Comment noted.
4/16/2018	Scott	Hanson	Email	50D	I understand and applaud the MAC's process of obtaining public feedback and comments, and making adjustments to the overall plan to incorporate and mitigate the community's concerns.	Comment noted.
4/16/2018	Scott	Hanson	Email	50E	I hope the MAC will continue to attempt to educate the community and dispel the misinformation being spread by potentially emotional public members.	See General Comment Response I(iii)
4/16/2018	Mick	Kaschmitter	Email	51A	I am opposed to the proposed changes at the Lake Elmo Airport as outlined in the LTCP and further defined in the recent EAW report.	Comment noted.
4/16/2018	Mick	Kaschmitter	Email	51B	The number of planes and operations do not warrant the amount of money being proposed and the hardships to the neighborhood with the moving of 30th St. N.	See General Comment Response J(iv)
4/16/2018	Mick	Kaschmitter	Email	51C	It is disappointing to see the continued use of the 26,000 operations per year being used in all reports. It has been noted this is not a correct figure, and more than actual. How this can still be used as part of the justification for the project? I think this is wrong. I am watching the blizzard outside knowing there are no operations being conducted at the LE airport. To get to the 26,000 operations you need 72/day. Every day! When weather does not allow flying, those 72 flights/day have to be flown on other days, increasing that number. We all know this is not realistic.	See General Comment Response O(i)
4/16/2018	Mick	Kaschmitter	Email	51D	Recent EAW had chart including 14,561 military ops. What is a military operation? This is a new figure that was not noted in the LTCP. More than half of all operations are now classified as military? What kind of military flights are these?	See General Comment Response O(ii)



Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/16/2018	Mick	Kaschmitter	Email	51E	Living close to the airport we have observed a large amount of the flights being student pilots. So are all flights either students or military? So how many are actual pilots with planes based at Lake Elmo?	See General Comment Response O(i)
4/16/2018	Mick	Kaschmitter	Email	51F	Please reconsider and change to the No-Action Alternative.	See General Comment Response C(iii)
4/17/2018	Elizabeth	Buckingham	Email	52A	In MAC's 1965 expansion plan of the Lake Elmo Airport, it plans to lengthen runways to the southeast into West Lakeland Township property it took by eminent domain in 1969.	See General Comment Response H
4/17/2018	Elizabeth	Buckingham	Email	52B	There will be enormous excavation work causing soil disturbances.	In most areas, no excavation will take place because primary construction activities will involve placing fill material on top of the ground to build up the surface topography for the runways and taxiways. Excavation may occur to replace poor soils in select locations identified following detailed geotechnical investigations, but these activities are not expected to disturb any soils more than 5 feet below the existing ground surface.  See also General Comment Response N
4/17/2018	Elizabeth	Buckingham	Email	52C	The airport property and east to the St Croix River has already been designated as a Superfund Clean Act by the MN Dept of Health because of TCE penetrating wells in Baytown Township, so any and all soil movement causes greater harm to neighbors and wildlife habitats. Why is it that MAC has not listed in the EA/EAW that its property is in a designated Superfund Clean Act?	See General Comment Response N
4/17/2018	Elizabeth	Buckingham	Email	52D	MAC should cause no additional harm to neighbors and wildlife and its habitats. Rebuild the existing runways "as is" to keep the environmental impact as low as possible to our communities.	See General Comment Response C(iii)
4/17/2018	Elizabeth	Buckingham	Email	52E	PS. I expect a personal written reply from MAC.	See General Comment Response U
4/17/2018	Richard	Gergen	Email	53A	I live in West Lakeland township on 30th and Neal Avenue, directly across from the	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					proposed expansion site for the new runway and would like to express to you that I am opposed to the proposed plan for a variety of reasons.	
4/17/2018	Richard	Gergen	Email	53B	I moved to this location approximately 1994. I really love the area because of the duality of living in a rural/semi-rural location but still being very close in to city locations. In 2000 or so we started looking for a new location to build a new house as our family was growing but we found we had the ideal location already so in 2002 we built a new house on the same property, essentially doubling down on our investment in the area. During the entire time that I've lived here, the airport has been an asset. The airport itself and the small planes that make use of it add a nice ambiance to the area. The proposed expansion puts all that at risk and turns an asset to a liability in my opinion.	See General Comment Response G
4/17/2018	Richard	Gergen	Email	53C	The rerouting of 30th street will cause major inconveniences for all of the families that call this area their home	See General Comment Response B
4/17/2018	Richard	Gergen	Email	53D	not to mention the destruction of the trees, most of which have already been here longer than I have	See General Comment Response M(i)
4/17/2018	Richard	Gergen	Email	53E	On top of that, there's the concern about the wildlife that currently makes that area their home. We enjoy the geese, ducks, deer and other wildlife that is in the area and have sincere concerns with what will happen with them.	See General Comment Response L(i)
4/17/2018	Richard	Gergen	Email	53F	For me personally, the realignment of the street and the extension of the airport will be right in front of our property. Right now, we look out to a line of trees with an agricultural field on the other side.	See General Comment Response B(ii)
4/17/2018	Richard	Gergen	Email	53G	The extension of the airport across from us will include additional lights for the runway and the destruction of those trees so we will be faced with looking out our window to lighted runways. This also brings the noise	See General Comment Response M(ii)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					much closer to home and will be a much larger annoyance than it is now.	
4/17/2018	Richard	Gergen	Email	53H	In addition to the primary concern as to what it will do to the landscape, there's also the concern about larger planes making use of the airport. People have moved here over the last 50+ years knowing the airport is there, observing the planes, noise level etc. and made the decision to invest in their home. Larger planes are a big part of the concern for the entire area.	See General Comment Response A(i)
4/17/2018	Richard	Gergen	Email	53I	We've been told that's not the reason for the expansion, but I've learned that much of the information is misleading at best and outright inaccurate in some cases.	See General Comment Response I(iii)
4/17/2018	Richard	Gergen	Email	53J	We were told no taxpayer money would be used, but that is misleading. We've been informed recently that MAC intends to obtain funding from the FAA which is clearly taxpayer money. When asked for clarification they meant Property taxes, but this is a misleading piece of information.	See General Comment Response R
4/17/2018	Richard	Gergen	Email	53K	We were told there are some 25,000 airplane operations each year which I find very dubious. If the airport ran 24 hours a day, 365 days a year that would be one flight operation every 20 minutes. Living right across from the airport I can unequivocally tell you that number is not true.	See General Comment Response O(i)
4/17/2018	Richard	Gergen	Email	53L	We've been told repeatedly that they are seeking input from the community, but every session I've gone to has been extremely tilted in favor of the expansion. When one of the people in favor of the expansion spoke, they were given deference and agreed with by the panel. When one of the people opposed to the expansion spoke, the panel challenged, countered and discounted those comments. It was clear the panel had already determined what they were going to do and the gathering of input felt like a charade.	See General Comment Response I(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/17/2018	Richard	Gergen	Email	53M	There also doesn't appear to be a real need for this.	See General Comment Response J(i)
4/17/2018	Richard	Gergen	Email	53N	I'm not aware of the exact distances involved, but there's the New Richmond airport and downtown St. Paul airport very close by	See General Comment Response C(i) and C(ii)
4/17/2018	Richard	Gergen	Email	53O	the fiscal responsibility in spending millions of dollars to expand a runway when there are viable alternatives close by seems very wasteful.	See General Comment Response J(i) and R
4/17/2018	Richard	Gergen	Email	53P	Finally there's what it will do to property values in the area.	See General Comment Response K
4/17/2018	Richard	Gergen	Email	53Q	This whole process has had the appearance of meeting a "Purpose and Need" with an emphasis on Purpose but not so much on Need. It has become clear during the events that I attended the panels were taking into account the desires of less than 200 pilots using the airport and not the community at large. To be clear we're not opposed to making the current airport safe. We're not trying to get the airport to close, in fact we are very much for keeping it open. What we are against is the expansion of the airport being pushed through with what appears to be careless disregard of the impact on the community.	See General Comment Response I(i)
4/17/2018	Vincent	Anderson	Email	54A	Attached is a word document of my comments on the Lake Elmo Airport Expansion EA / EAW. I am opposed to the proposed expansion. I find the EA / EAW document missing important information, containing erroneous information, and containing information new to the plan.	See responses to comments 54B through 54BO below.
4/17/2018	Vincent	Anderson	Email	54B	I do point out that the notice of public hearing held recently in the area may be defective – a Metropolitan Airports Commission (MAC) newsletter which I received March 22 does not refer to the hearing as for the EA / EAW but for comment on the Long Term Comprehensive Plan (LTCP). The section of the newsletter announcing the hearing is titled Public hearing set for Lake Elmo	In accordance with state and federal regulations, a notice of availability and public hearing for the Draft EA/EAW document was published in the Minnesota Environmental Quality Board (EQB) Monitor, St. Paul Pioneer Press, Stillwater Gazette, and Oakdale/Lake Elmo Review the week of February 26. The notice was circulated via e-mail to the project e-news



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					<p>Airport's long-term plan and does not even mention the EA / EAW. Perhaps another meeting is required?</p>	<p>subscriber list on February 28, and reminder notices were sent to the e-news subscriber list on March 28 and April 13. This notice was also published in the Minnesota State Register on March 19.</p> <p>The specific email notice referenced in this comment was sent to e-news subscribers of MSP and the MAC. It was intended to reach a wide audience and provide a simple explanation of the public hearing, acknowledging that not all recipients would know what an EA/EAW means.</p>
<p>4/17/2018</p>	<p>Vincent</p>	<p>Anderson</p>	<p>Email</p>	<p>54C</p>	<p>The easement mentioned for the existing 30th street is a prescriptive easement and there is nothing in Minnesota Statutes which makes any provision for 'extinguishing' an easement as MAC states. The law specifically states the MAC has the power to acquire the land but it is widely acknowledged that MAC is already the owner of the land. See Minnesota Statute 473.608 Subd 2. Perhaps if MAC had taken action after land acquisition there might be an argument but since MAC acquired ownership the public has enjoyed quiet use of the property and MAC has done nothing over the period of its ownership to post their intent the take over the easement. MAC has posted no notice on the easement regarding it being private and subject to the owner's control. MAC has quietly permitted the road to be maintained and improved at public expense. MAC has at no time closed the road to break continuous use by the public. In addition it has been acknowledged by MAC at public meeting that this would be the first time MAC has crossed a governmental boundary which may present yet another impediment.</p>	<p>Minnesota Statutes Section 473.608 gives the MAC the authority to acquire all necessary right, title and interest in and to lands required for airports. This authority includes the acquisition of any prescriptive easements already devoted to public use. Moreover, the purpose of the EA/EAW review is to identify the primary environmental effects of a proposed project and to assess whether the proposed project presents the potential for significant environmental effects warranting greater investigation through the preparation of an environmental impact statement (EIS). 40 CFR §1509.9; Minn. R. 4410.0300; 4410.1700. Public comments are intended to be limited to the completeness of the information presented and the identification of specific potential environmental impacts of the project. See Minn. R. 4410.1600 ("The comments shall address the accuracy and completeness of the material contained in the EAW, potential impacts that may warrant further investigation before the project is commenced and the need for an EIS on the proposed project"). The comment does not identify any deficiency in the completeness of the environmental information presented in the draft EA/EAW</p>

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						nor does the comment identify any specific potential environmental effects requiring further evaluation. The EA/EAW includes available and adequate information regarding 30th Street North for purposes of evaluating the proposed action and is therefore adequate and complete.
4/17/2018	Vincent	Anderson	Email	54D	MAC also indicates that they would seek a land release from the FAA to allow realignment of 30th street. MAC at no time during the review process has mentioned this release or its need which should be understood by all concerned and should have been discussed during the review process for the plan. I suggest the plan (LTCP) should go back through the approval process after this need has been determined and discussed.	Realignment of 30 <sup>th</sup> Street North will require a land release for non-aeronautical use from the FAA because it will occur on land the FAA considers federally obligated airport property. Any property, when described as part of an airport in an agreement with the United States or defined by an airport layout plan (ALP) or listed in the Exhibit 'A' property map, is considered to be 'dedicated' or obligated property for airport purposes by the terms of the agreement. At Lake Elmo Airport, this applies to all 640 acres of airport property. The airport sponsor must ensure that any proposed land uses will not conflict with its Federal grant assurances. According to FAA Order 5190.6B, Section 22.23, airport sponsors must submit a written request to the Airports District Office (ADO) if they desire a release from, or modification, reformation, or amendment to, its federal obligations. This has been clarified in Section 5.12 of the Final EA/EAW.
4/17/2018	Vincent	Anderson	Email	54E	Chapter 2, Page 2-1 refers to 'needs' when these are not 'needs' but instead potentially wants. If the expansion was a true need the airport could not function in its define role today and in the past half century. It is only the declared potential desire to accommodate larger aircraft that seems to be driving the 'need.'	See General Comment Response J(i)
4/17/2018	Vincent	Anderson	Email	54F	Page 2-4 discusses 'airplanes that will regularly use it' in reference to weight restrictions. The number of weight restricted	Because there are no reporting requirements for aircraft loads, there is no way to definitively determine the share of

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					<p>flights discussed during the public hearing process was in single digits annually. The specific aircraft that would be restricted have not been appropriately defined.</p>	<p>aircraft operations that occur at a specific useful load percentage at Lake Elmo Airport. Useful load is defined as an aircraft's maximum takeoff weight minus its empty weight. An aircraft's useful load can be used to transport either fuel or payload (passengers, baggage, and/or cargo). There are a variety of factors, including runway surface condition, density altitude, temperature and humidity that affect the performance and therefore required runway length for aircraft operations. However, aircraft are designed and intended to regularly operate at useful loads at and above 60%. If an aircraft is unable to operate above 60% useful load, the usefulness of the aircraft is limited. This is particularly true on hot days and when the runway is wet or slippery. With full fuel, several of the common aircraft types operating at Lake Elmo Airport need to take off above a 60% useful load weight just to carry the pilot and a passenger. To carry multiple passengers with full fuel, several of these aircraft types operate closer to a 90% useful load weight. One of the project goals is to improve the effectiveness of the runways at Lake Elmo Airport for the aircraft currently using them – both aircraft based at the Airport and those using it on an itinerant (visiting) basis. The proposed runway lengths are intended to improve the users' ability to safely carry more passengers, cargo, and/or fuel on their aircraft in a wider variety of weather conditions at a takeoff weight representing approximately 80-90% of their useful load.</p>
4/17/2018	Vincent	Anderson	Email	54G	<p>Table 2.2 on Page 2-6 needs to have a column identifying the number of these specific aircraft which are based at Lake Elmo (21D).</p>	<p>Airplanes used to determine the proposed primary runway length may not be based (i.e. stored) at the Airport, but according to the MAC Noise and Operations Monitoring System (MACNOMS) and the FAA's Traffic</p>

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						<p>Flow Management System Counts (TFMSC) data, they have used the Airport on a transient basis (i.e. arrive from other airports at which they are based). All of the airplanes listed in Table 2.2 are within the family grouping of propeller-driven aircraft that weigh less than 12,500 pounds and have fewer than 10 passenger seats and have similar operating characteristics. Together they represent “the listing of airplanes that results in the longest recommended runway length,” which are the critical aircraft for Lake Elmo Airport as defined by FAA Advisory Circular (AC) 150/5325-4B. Of the aircraft listed in Table 2.2, the Socata TBM 700, the Piper PA-31 Chieftain, and the Piper PA-30 Twin Comanche were based at Lake Elmo Airport in 2016. The other aircraft listed in this table use Lake Elmo Airport on a transient basis.</p>
4/17/2018	Vincent	Anderson	Email	54H	<p>Table 2-3 on Page 2-8 refers to crosswind requirements. As was pointed out in the long term plan, the heavier aircraft are better capable to use the crosswind runway, and I submit that runway could be extended ON AIRPORT beyond what is planned to accommodate these and other heavier aircraft. The crosswind could be the longer runway.</p>	<p>As stated in Appendix A, Page A-24, a 2,750-foot crosswind runway length was selected because it “would accommodate the average takeoff requirements of the smaller and lighter airplanes operating at Lake Elmo Airport on a regular basis.” An alternative that considers a longer 3,200-foot length for Runway 04/22 and makes Runway 04/22 the primary runway is discussed in Chapter 3, Section 3.2.3, as Primary Runway Alternative A. As stated in this section, “this alternative was eliminated from further consideration because it 1) does not meet the runway length needs of Airport users, 2) does not address existing incompatible land uses in both Runway 14/32 RPZs, and 3) does not provide optimal wind coverage on the longer (primary) runway.”</p>
4/17/2018	Vincent	Anderson	Email	54I	<p>Page 3-2 Paragraph 3.2.1 refers to incompatible land uses in the RPZ. It should be noted that MAC allowed the construction</p>	<p>The proposed action will move Runway 14/32 further away from the stormwater retention pond located west of Manning</p>



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					of a dike and runoff water retention pond in the existing RPZ west of Manning without taking any action to curtail that construction.	Avenue, which will be an improvement from a wildlife hazard perspective. As a matter of practice, the MAC does not advocate the construction of open-water retention ponds in close proximity to its airports due to their potential to attract and/or sustain hazardous wildlife populations. Although it did not support construction of the open-water retention pond west of Manning Avenue, the MAC reviewed plans for Easton Village, consulted with the USDA-APHIS Wildlife Biologist, and provided recommendations concerning the design of storm water retention and infiltration areas that would minimize wildlife hazards to the extent practicable. The developer updated the landscape plan in response to these comments. The MAC routinely reviews and comments on off-Airport development proposals near the Airport to assist with landscaping design that reduces wildlife attractants. However, the MAC cannot require off-site entities to limit wildlife attractants.
4/17/2018	Vincent	Anderson	Email	54J	Page 3-3 refers to the transportation aspects of 21D. I submit that 21D is NOT a transportation airport or real reliever to MSP. It is a sport flying airport, with minimal if any commercial use. It is seriously doubted that any based aircraft would apply to MSP for the ability to base there should 21D be restricted. 21D is NOT the only airport in Washington County. Forest Lake Airport (25D) is fully capable of handling many of the aircraft which use 21D today. MAC doesn't reference it presumably because they don't own it.	Federal, state, and local classifications for Lake Elmo Airport are discussed in Appendix A, Section 2.1. Forest Lake is identified as an Alternate Existing Airport in Chapter 3, Section 3.2.2. To preserve capacity at MSP, it is critical that corporate aviation services be provided at the MAC's key reliever airports (St. Paul Downtown, Anoka County-Blaine and Flying Cloud). The remaining reliever airports (Crystal, Airlake and Lake Elmo) complement the key relievers by accommodating personal, recreational and some business aviation users. Lake Elmo is intended for use primarily by small propeller-driven aircraft. According to the FAA's aircraft registration data, approximately 24 percent of aircraft

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						based at Lake Elmo are registered to corporations.
4/17/2018	Vincent	Anderson	Email	54K	The drive time discussion on page 3-4 is new to this EA / EAW and was not part of the Long Term Comprehensive Plan as approved. Introducing that discussion and purported facts should require a public comment period and reapproval of the plan. I understand that West Lakeland will be taking issue with the drive times displayed.	The Draft EA/EAW document was released for public review and comment on February 26, 2018. A public hearing was held at Oak-Land Middle School on April 4, 2018, to accept comments on the Draft EA/EAW from interested citizens. The MAC also accepted written statements regarding the Draft EA/EAW from local, state, and federal government agencies, as well as from the general public, from February 26 through April 19, 2018, a period of 53 days.  See also General Comment Response C(v)
4/17/2018	Vincent	Anderson	Email	54L	On this same page it refers to Lake Elmo (21D) in supporting regional economies. The traffic counts and categories described later in the document refute the use of 21D as presented. 21D is a PRIMARILY a sport / recreational field	See General Comment Response A(ii)
4/17/2018	Vincent	Anderson	Email	54M	'private' aircraft use is diminishing as reported by MAC in the April 1 issue of the St. Paul Pioneer Press.	See General Comment Response J(iv)
4/17/2018	Vincent	Anderson	Email	54N	I do not understand why the DRAFT LTCP plan is being referenced beginning on page 3-6. This document we are supposed to be reviewing is the EA / EAW for the APPROVED plan. Presenting this information opens it back up to requiring new approval.	As noted in the introduction to Chapter 3, "FAA Order 5050.4B, <i>National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions</i> , provides specific direction on the consideration of alternatives in an EA under NEPA. The alternatives chapter of an EA is based on the purpose and need statement; compares the no-action, the proposed action, and reasonable alternatives (if any); and identifies each reasonable alternative's environmental effects." The alternatives considered during the LTCP process, with additional alternatives identified during the EA/EAW process are presented in Chapter 3 of the

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						Draft EA/EAW, in accordance with FAA Order 5050.4B.
4/17/2018	Vincent	Anderson	Email	54O	I do point out in the final paragraph on the page that MAC says the 'legacy' alternative of expanding the primary runway has been shown for several decades. What MAC neglected to mention (lack of candor?) was that extension of the primary in the previous Long Term Comprehensive Plan was deemed to be beyond the 20 year time period of that plan!	See General Comment Response H
4/17/2018	Vincent	Anderson	Email	54P	The unidentified figure on the page following 3-8 is unreadable. Identified numbered landmarks are not explained and the legend is cut off on the left. Note there is also no scale on this figure as would be common.	This figure is clearly identified as Figure 3-3 in the lower right. All figures in the Draft EA/EAW are available for review electronically on the project website and in hard copy at Lake Elmo Public Library, Lake Elmo City Hall, Baytown Community Center, and the MAC General Offices. All figures in the Draft EA/EAW report are complete and graphic scales and labels are provided on figures as appropriate.
4/17/2018	Vincent	Anderson	Email	54Q	The paragraph at the bottom of page 3-21 refers to MAC starting to convene a zoning board during the EA / EAW process. Isn't this long overdue? Shouldn't MAC have been involved in this with the communities a long time ago? Housing has been built in the impacted area. It is important to note the property south of 30th street, owned by MAC for over 50 years, has never been zoned airport. MAC simply hasn't been 'minding the store.'	See General Comment Response F(iii)
4/17/2018	Vincent	Anderson	Email	54R	Throughout the discussion of the alternatives in the section on Tree Removal the number and species and approximate age of the trees should be specifically identified.	The approximate acreage of tree removal is identified for the No-Action Alternative, Alternative B, and Alternative B1 in Chapter 3, Table 3-3, of the Draft EA/EAW. Trees and woody shrubs observed at Lake Elmo Airport are listed in Chapter 5, Table 5-3, of the Draft EA/EAW.
4/17/2018	Vincent	Anderson	Email	54S	Note on page 3-23 there is a discussion of the No Action Alternative. In this section MAC identifies 13 acres of trees needing to be removed. Note again that Mac simply has	See General Comment Response M(iii)

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					not been maintaining the existing airport as required. Why should grant money (the expected means of funding the changes) be used to perform routine maintenance that MAC hasn't elected to perform?	
4/17/2018	Vincent	Anderson	Email	54T	One should also note the fence (installed with funding from Homeland Security I understand) has not been maintained and now contains trees that have grown through the fence. This is evident along both 30th street and along Neal Avenue.	<p>The Lake Elmo Airport has a full-time maintenance worker to manage, repair, and maintain the airfield, including the fence. The 30th Street North fence line from Neal Avenue to Manning Avenue has a number of trees that have grown through the fence, but still remains in stable condition.</p> <p>As part of the proposed action, the fence along 30th Street North will be relocated along the north side of the realigned road segment. The fence along Neal Avenue North to the north of 30th Street North will not be affected by the proposed action.</p>
4/17/2018	Vincent	Anderson	Email	54U	You should note throughout the document that tree removal (20 acres or more) is identified and there is no recognition that the MET Council 20 year plan (Thrive) identifies trees as an important resource and are to be saved. Clear cutting especially is to be avoided.	The MAC recognizes that trees are an important resource and will carefully consider individual trees to only remove those that represent aeronautical hazards under FAA criteria.
4/17/2018	Vincent	Anderson	Email	54V	I will make a single statement on wetlands for all the alternatives. Almost every figure showing wetlands is different. Of significant importance is the northern boundary of the wetland and standing water south of 30th. The platting book at Washington County shows an additional diagram that was not presented.	Two sources of information were used for identifying wetlands on and in the vicinity of the Airport. As described in Chapter 4 and Appendix C of the Draft EA/EAW, a field delineation for wetlands directly affected by the proposed action was completed in June 2017, in accordance with federal Clean Water Act and state Wetland Conservation Act requirements. The field delineated wetland boundaries are shown on the figures in the Draft EA/EAW when identifying specific direct impacts to wetlands on Airport property. U.S. Fish and Wildlife Service National Wetlands Inventory data is also used in several Draft EA/EAW graphics to show



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						other wetlands on and in the vicinity of the Airport, to disclose the existence of these wetlands. The difference between these two sources of information is noted either in the legend or in the source notes as applicable.
4/17/2018	Vincent	Anderson	Email	54W	MAC uses the term flooding. Flooding is a technical term and is used only when water exceeds the Natural Ordinary High Water (NOHW). If there has not been an NOHW determined, and I surmise there hasn't, then that needs to be the first step. Various ordinances and rules define the necessary setback for any construction (e.g. road). It very well may not be possible to construct the planned revised 30th street.	Chapter 4, Section 4.5.7 of the Draft EA/EAW identifies a mapped floodplain south of 30th Street North. The NOHW for the northern edge of the public water associated with this floodplain is identified in Appendix C. No project activities would occur below the NOHW associated with this public water. As noted in Chapter 5, Table 5-6 of the Draft EA/EAW, various permits will be required before any construction occurs. To obtain these permits, the MAC will demonstrate compliance with all applicable rules and regulations, including those associated with the mapped floodplain south of 30th Street.
4/17/2018	Vincent	Anderson	Email	54X	Sure, it is a minor point, the legend associated with Figure 4-3 is wrong. It appears the RPZ and MAC Property designations are reversed.	The information shown in the figure matches the categories referenced in the legend.
4/17/2018	Vincent	Anderson	Email	54Y	The chart, Table 4-1, on page 4-5 is disturbing. First it should be noted that this is all new data. MAC at no time in the past identified any Military use of the field. MAC again exhibits a lack of candor. Note that all the counts on traffic are estimates and as such I ask if estimates are really in the FAA Master Record as identified and reported? The estimates are derived according to MAC by using the noise monitoring system and then estimated the total by comparing the 'observed' data with actual (from a field with a control tower – Anoka County I believe) and adjusting, What does this mean? It means that MAC takes a known false number and adjusts it arbitrarily based on difference between observed and actual at	See General Comment Responses O(i) and O(ii)

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					another facility. There is no justification made of using Anoka County. We have no idea if using a different airport, e.g. St. Paul Downtown or Crystal or MSP itself, for the adjustment factor would have resulted in higher or lower number at Lake Elmo.	
4/17/2018	Vincent	Anderson	Email	54Z	MAC in open meeting indicated that they would recommend the runway lengthening regardless of the traffic counts (itself an absurd statement – an airport not being used would get this significant planned investment?).	See General Comment Response J(iv)
4/17/2018	Vincent	Anderson	Email	54AA	How on earth did MAC determine that over half the traffic is military? Can you really tell that based on noise data?	See General Comment Response O(ii)
4/17/2018	Vincent	Anderson	Email	54AB	How can these estimates be presented to 5 significant digits? Folks, that's false statistics! (To the reader: If you don't understand the issue of significant digits I respectfully request you contact someone who does, have them review the entire traffic counts section and comment.)	Operations shown in Table 4-1 of the Draft EA/EAW were estimated for the 12 months ending 10/31/2016 by extrapolating from the best available data.
4/17/2018	Vincent	Anderson	Email	54AC	Military deserves another mention. Certainly this significant use by military is easily moved and likely would be better suited at some other airport outside MAC with less potential interference with flight operations at the major relievers and MSP.	See General Comment Response O(ii)
4/17/2018	Vincent	Anderson	Email	54AD	On page 4-8 there appears to be some sort of error in reporting. Twin Point Tavern and Gorman's are on Stillwater Boulevard. Perhaps it would be helpful to all reading this for the locations to be better defined.	Both of these restaurants are located on Stillwater Blvd as depicted in the graphic in the Draft EA/EAW.
4/17/2018	Vincent	Anderson	Email	54AE	I suggest that owners of these dining establishments ought to be paying for mention? Is there a reason some were not mentioned? What point is MAC trying to make identifying 2 restaurants by name rather than just saying restaurants? Why was Lake Elmo Inn not mentioned?	The dining establishments listed on Page 4-8 of the Draft EA/EAW are referenced to demonstrate that none exist in close proximity to the Airport. The Lake Elmo Inn is in the same general area as these other restaurants and its presence does not change the conclusion that no places of public assembly are affected by the proposed action.

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4/17/2018	Vincent	Anderson	Email	54AF	The Washington County Fairgrounds are NOT a mile north of the airport. The airport property extends north to 40th street and across 40th from the airport are the fairgrounds. The fairgrounds would be in the common traffic pattern for departure. The fairgrounds area is used frequently during the warmer weather not just at the county fair time. Why would MAC falsify the distance?	The distance to the fairgrounds referenced in the report is based on the driving distance from the main Airport entrance on Manning Avenue North to the main fairgrounds entrance on 40th Street North. The presence of the fairgrounds adjacent to MAC property does not change the conclusion that the fairgrounds are not within the approach and departure areas at the Airport.
4/17/2018	Vincent	Anderson	Email	54AG	Figure 4-5 has several dark areas which are not in the legend.	The information shown in the figure matches the categories referenced in the legend.
4/17/2018	Vincent	Anderson	Email	54AH	On page 4-12, Paragraph 4.4.4 does not appear to be applicable any more. I understand that Washington County has turned over zoning to the local municipal governments except in certain circumstances. Perhaps I am mistaken,	The Washington County Development Code, Chapter 2, on the County's website includes an Airport Overlay District, which is pertinent to discussion of existing zoning regulations on and in the vicinity of the Airport. Section 4.4.4 does not state that the County is the land use authority that enforces these zoning regulations, only that the zoning regulations originate from the County ordinance. As of January 1, 2017, Washington County no longer exercises land use authority in West Lakeland Township except for administration of ordinances affecting shoreland management, mining, floodplains, subsurface sewage treatment systems, and Lower St. Croix River bluffland and shoreland. West Lakeland Township has adopted the Washington County Development Code or a version similar to the document.
4/17/2018	Vincent	Anderson	Email	54AI	Seeing the chart on page 4-20 reminds me that the document needs to have a chart showing required setback from the wetlands for any construction as defined by VBWD, State of MN as applicable, Washington County, West Lakeland Township, MN-DNR and perhaps others.	Based on initial review of wetland fill activities described in Section 5.14.1, all applicable setback requirements can be met within the estimated areas of wetland impact identified in Figure 5-4. These setback requirements will be incorporated into the project during final design and permitting. This has been clarified in Section 5.14.1 of the Final EA/EAW.

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4/17/2018	Vincent	Anderson	Email	54AJ	I believe Figure 4-8 is wrong. The wetland south of 30th is shown in various maps as extending all the way to 30th. Note for example figure 4-9.	Figure 4-8 shows wetland boundaries mapped by Mead & Hunt and the U.S. Fish & Wildlife Service, while Figure 4-9 shows floodplain boundaries mapped by the Federal Emergency Management Agency (FEMA).
4/17/2018	Vincent	Anderson	Email	54AK	In the last line of Wetland 4 the term hydrology is used. I clearly do not understand the point the author is trying to make. Hydrology is a scientific study. The sentence implies something else.	This sentence was phrased incorrectly and will be updated in the Final EA/EAW to read as follows: "Saturation was the primary indicator of wetland hydrology along with several secondary indicators."
4/17/2018	Vincent	Anderson	Email	54AL	On page 4-27 in the middle the maintenance staff person is used as the resource on bird strikes? Read that as 'the guy who plows the snow and mows the grass.' Is this individual the MAC responsible person to count bird strikes? Was any contact made to the FAA who request pilots to report all bird strikes? What is the means of recording the maintenance person uses? Are they even recorded? If so where? The whole bird strike discussion seems less than professional and I believe new to the discussion as opposed to being brought up in the development of the LTCP.	Bird strikes are typically reported by individual pilots and on-site airport staff. Wildlife strike data should be reviewed with caution. Reporting is voluntary, and the FAA data may not accurately reflect the number of strikes that have occurred at Lake Elmo. The FAA estimates that only 20 percent of bird strikes were recorded prior to 2009, and only 30 percent of all strikes have been recorded nationwide since 2009. The FAA Wildlife Strike Database is available at <a href="http://wildlife.faa.gov/database.aspx">http://wildlife.faa.gov/database.aspx</a> .
4/17/2018	Vincent	Anderson	Email	54AM	It should be noted somewhere in this document that MAC has traditionally allowed hunting on MAC property south of 30. This has meant vehicle parking in the RPZ in addition to the actual hunting activity.. Does MAC plan to allow this use in the future	The MAC does not allow vehicle parking or recreational hunting in the Runway 32 RPZ. After implementation of the proposed action, the Runway 32 RPZ will be entirely north of 30th Street and within the perimeter fence, and therefore not accessible to the general public.
4/17/2018	Vincent	Anderson	Email	54AN	Table 5-1 on page 5-2 requires clarification and explanation. Is the reduction or increase a result of changes in the mix of aircraft or changes in the number of flights or some combination. Why would some emissions increase while others decrease? The variation in emissions is counter intuitive. Certainly this deserves explanation. Use of a model without meaningful comments on the results and their implication represents incomplete research.	As noted on Page 5-2, the overall decrease in pollutant emissions results from the forecasted decline in aircraft operations from 2016 to 2025 presented in Appendices A and J. Slight increases in VOC and NOX emissions are due to the forecasted changes in fleet mix presented in Appendices A and J, as different aircraft engines produce pollutants in varying quantities.



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4/17/2018	Vincent	Anderson	Email	54AO	While MAC states the limit (100 tons) for construction emissions these is nothing stated for the ongoing emissions as a result of air (or vehicle) traffic.	Aircraft operational emissions associated with the 2016 baseline, 2025 no-action, and 2025 preferred alternative scenarios are presented in Table 5-1 on Page 5-2 of the Draft EA/EAW.
4/17/2018	Vincent	Anderson	Email	54AP	There also ought to be an analysis of vehicle emissions and the changes as a result of lengthening 30th street. Note especially that this added length applies to all traffic including diesel buses and heavy duty vehicles.	<p>Carbon monoxide (CO) is the only traffic-related NAAQS pollutant that has been of regulatory concern in the Twin Cities Metropolitan Area, as it is within an EPA-designated CO "limited maintenance" area. On November 8, 2010, the EPA approved a 10-year Limited Maintenance Plan for the Twin Cities. Under the Plan, the EPA determined that there is no requirement to project emissions over the maintenance period. No regional modeling analysis is required; however, federally-funded projects are still subject to "hot spot" analysis requirements. The EPA has approved a screening method to determine whether detailed analysis is required for hot spots, which uses a traffic volume threshold of 79,400 entering vehicles per day. Intersections with traffic volumes above this threshold must be evaluated using EPA-approved emission and dispersion models. Intersections with traffic volumes below this threshold are not expected to result in CO concentrations that exceed state or federal standards, and detailed modeling is not required. The proposed realigned segment of 30<sup>th</sup> Street North does not meet the criteria for hot spot CO analysis because it does not involve an intersection that exceeds the traffic volume threshold; therefore, no detailed modeling is required.</p> <p>The proposed action would lengthen 30<sup>th</sup> Street North by approximately one-quarter mile. Specific typical emissions factors for NAAQS criteria pollutants were applied to Washington County traffic forecasts to</p>

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						<p>estimate the increases in pollutant emissions associated with the proposed additional length of 30<sup>th</sup> Street North. Based on comparison of annual emissions estimates for the existing road segment versus the proposed realigned road segment, using 2,000 vehicle trips per day, the estimated annual CO emissions increase would be 2,496 pounds per year (lbs/yr), the estimated NO<sub>x</sub> emissions increase would be 151 lbs/yr, the estimated SO<sub>2</sub> emissions increase would be 3 lbs/yr, the estimated PM<sub>10</sub> emissions increase would be 10 lbs/yr, the estimated PM<sub>2.5</sub> emissions increase would be 5 lbs/yr, and the estimated VOC emissions increase would be 166 lbs/yr. According to the FAA Aviation Emissions and Air Quality Handbook, ground vehicle emissions associated with a proposed action may be combined with aviation emissions to determine whether total emissions associated with a proposed action exceed federal <i>de minimis</i> thresholds. When combined with estimated changes in aircraft operational emissions, estimated increases in vehicle emissions associated with lengthening 30<sup>th</sup> Street North do not exceed the <i>de minimis</i> thresholds established by the FAA Aviation Emissions and Air Quality Handbook, and therefore do not change the conclusion that there are no significant air quality impacts for the preferred alternative or no-action alternative.</p> <p>In addition to NAAQS criteria pollutants, the EPA also regulates air toxics emitted from mobile sources, known as Mobile Source Air Toxics (MSATS). On October 18, 2016, the Federal Highway Administration (FHWA) issued a revised interim guidance update regarding MSATS</p>

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						<p>in a NEPA analysis. The guidance includes three categories and criteria for analyzing MSATS. The realignment of 30<sup>th</sup> Street North does not result in changes in traffic volumes, vehicle mix, basic project location, or any other factor that would cause a meaningful increase in MSATS; therefore, the proposed action qualifies as a Tier 1 project. Tier 1 projects are exempt from conformity requirements under the Clean Air Act and no analysis of MSATS is necessary.</p> <p>This information has been added to Section 5.1.1 of the Final EA/EAW.</p>
4/17/2018	Vincent	Anderson	Email	54AQ	The chart 5-3 on page 5-4 ought to include the census for each species to be removed.	Table 5-3 identifies specific tree species within the area of concern. These are all common tree species in the Twin Cities metropolitan area. Identification of specific trees to be trimmed or removed will be determined during the detailed project design phase.
4/17/2018	Vincent	Anderson	Email	54AR	On page 5-10 just ahead of paragraph 5.7 there is a discussion of farmland converted as part of the preferred alternative. Note the calculated point value for the converted acreage. I submit that MAC has failed to count the acreage used for hay production which has taken place at 21D. The entire length of the new runway and new taxiway would no longer be available for this farming activity. I believe inclusion of this area would increase the point value over the threshold.	In response to a comment received from the Minnesota Department of Agriculture (see Appendix N), an updated farmland conversion impact rating was requested from the USDA. Based on the revised Form AD-1006 from USDA, the farmland to be converted as a result of the preferred alternative has a total value of 136 points, which does not exceed the 160-point threshold for additional consideration and analysis of farmland protection or alternative sites. The findings have been updated accordingly in Section 5.6 of the Final EA/EAW, and the revised Form AD-1006 is included in Appendix G of the Final EA/EAW. Based on farmland value scores calculated in coordination with the USDA Natural Resources Conservation Service, there are no significant impacts associated with either the no-action or preferred alternatives, as defined by the federal

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						Farmland Protection Policy Act, NEPA, and MEPA.
4/17/2018	Vincent	Anderson	Email	54AS	Page 5-12 discusses the airport zoning board. Note this board or an equivalent defined under Minnesota Statute 360 should have the required zoning already in place. MAC is again deficient in performing its duties. The sentence in the 2nd paragraph after 5.9.1 references deviation from the Model Zoning Ordinance. I submit this whole sentence is 'eye wash' – sounds important but doesn't say anything.	See General Comment Response F(iii)
4/17/2018	Vincent	Anderson	Email	54AT	Page 5-13 discusses 30th street. Considerable important data are missing, A full explanation of when and detailed counts of the traffic study are not included.	See General Comment Response B(iii)
4/17/2018	Vincent	Anderson	Email	54AU	I can find no mention of the extra road length which would be necessary when calculating vehicle emissions.	The proposed action would lengthen 30 <sup>th</sup> Street North by approximately one-quarter mile. This information has been added to Section 5.1.1 of the Final EA/EAW.
4/17/2018	Vincent	Anderson	Email	54AV	'Undue' (as in undue burden) is a word difficult to define and quantify. Is MAC asking the pilots or the people using the road if there is an undue burden? Is this Mead and Hunt's perception of burden based on their limited if ever use of the road? A 'little' burden multiplied by a large number of impacted drivers and passengers is not 'little.'	The estimated additional 46 seconds per trip on the realigned 30th Street North is not expected to impose a significant difficulty or expense on individual road users.  See also General Comment Response B
4/17/2018	Vincent	Anderson	Email	54AW	In addition, adding turns in both directions increases the likelihood of accidents when compared with the current straight road. Mead and Hunt, and MAC should be able to quantify that based on available traffic design standards and accident statistics.	Each alternative would be designed using applicable geometric standards for the proposed design speed. These standards take into account appropriate safety factors.  See also General Comment Response B
4/17/2018	Vincent	Anderson	Email	54AX	At the top of page 5-14 it discusses deer. I submit much deer movement is during night or twilight. How did MAC come to a different opinion?	Deer are crepuscular (move and feed during twilight periods); however, deer observations by Airport staff generally occur during daytime maintenance activities.
4/17/2018	Vincent	Anderson	Email	54AY	The noise discussion starts on page 5-16. Note first that MAC uses a different noise	See General Comment Response D.



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					model than used in the previous submission of the LTCP. Discussion of why a different model was chosen is necessary. The discussion is incomplete without this important information.	The reasons why a different noise model was used for the Draft EA/EAW when compared to the LTCP is also discussed in Appendix J of the Draft EA/EAW.
4/17/2018	Vincent	Anderson	Email	54AZ	You should note that the second to the last paragraph on page 5-16 states that the noise model is based on user supplied data without a chart of as to what that data is and why those specific parameters were chosen.	See General Comment Response D
4/17/2018	Vincent	Anderson	Email	54BA	The reader is required to accept the data generated on faith. Does MAC make any assumptions regarding aircraft age and expected turnover to a newer fleet (translate as quieter)?	See General Comment Response D
4/17/2018	Vincent	Anderson	Email	54BB	MAC should show how the fleet has (or has not) changed over time.	See General Comment Response D.  The noise analysis presented in Section 5.11 considers existing fleet mix and projected changes in fleet mix associated with the proposed action. These assumptions are detailed in Appendices A and J.
4/17/2018	Vincent	Anderson	Email	54BC	Nowhere does MAC calibrate the tool with field observations and measurements, something easy to do and important to do but not done.	The MAC does not have a noise monitor recording actual noise levels at Lake Elmo Airport. The federal process governing the EA requires the use of the latest FAA-approved model for the noise analysis rather than monitored noise data. Per applicable FAA guidance, noise monitoring is not required for FAA NEPA noise evaluations.  While the FAA does not use monitoring data to calibrate its noise model, the MAC has used its system of 39 noise monitors located around Minneapolis-St. Paul International Airport (MSP) to compare the modeled DNL levels with measured levels on an annual basis as part of the MSP Annual Noise Contour Report. The average absolute difference between modeled and measured DNLs in the 2017

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						<p>Annual Noise Contour Report was approximately 3.1 dB, compared with 2.3 dB in 2016 and 2.1 dB in 2015. The absolute median difference is 1.4 dB, compared with 1.1 dB in 2016 and 1.4 dB in 2015 indicating that the 2017 actual noise contours generated through modeling in AEDT are similar in absolute difference to actual measured noise levels. The absolute median difference is considered the most reliable indicator of correlation when considering the data variability across modeled and measured data. Overall, the small variation between the actual measured aircraft noise levels and the AEDT modeled noise levels provides additional external system verification that AEDT is providing an accurate assessment of the actual aircraft noise impacts around MSP.</p> <p>See also General Comment Response D</p>
4/17/2018	Vincent	Anderson	Email	54BD	<p>On page 5-17 section 5-12 MAC again discusses the easement and suggests providing the local government with an interest in the changed location. Note they do not say they are going to do that, or that it would be determined following the completion of the EA / EAW.</p>	<p>As noted on Page 5-17, "Realignment of the township collector road 30th Street North and conveyance of an appropriate property interest to the appropriate local government authority/authorities will be determined following completion of this EA/EAW."</p>
4/17/2018	Vincent	Anderson	Email	54BE	<p>Note also that MAC claims nothing in current law prevents MAC at some time in the future taking that easement and using all the property as airport with no road!</p>	<p>The referenced page/section does not include such a statement.</p>
4/17/2018	Vincent	Anderson	Email	54BF	<p>I ask the reader to have the noise contour charts, figures 5-1, 5-2, and 5-3 to follow this next discussion. Note first that the shape of the contours is considerably different than those presented in the approved LTCP. MAC has apparently chosen a different tool providing different results. Certainly there needs to be an explanation of that choice as well as the parameters used. Measure the distance from the end of the runway to the</p>	<p>See General Comment Response D.</p> <p>As noted on Page 5-16 of the Draft EA/EAW, "AEDT requires a variety of user-supplied data, including physical airfield facilities, aircraft activity, fleet mix, day-night split, runway use, and flight tracks" to generate noise contours. These data inputs are presented in Appendix J of the Draft EA/EAW. Although all of these</p>

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					<p>'point' at the southern most contour on Figure 5-1 and its respective distance on Figure 5-2. Note that the distance is less on Figure 5-2. Why? The announced variable on the charts is time – year 2015 (or 16?) vs. 2025. The missing information is important so that it may be verified. Now measure that same distance on Figure 5-3 and compare it to your distance on Figure 5-2. Note again the distance is less on 5-3 with NO announced difference other than the new runway. I accuse MAC of doctoring the parameters to achieve a satisfactory result. This appears again to be a lack of candor / integrity on MAC's part.</p>	<p>variables contribute to differences between contours associated with different annual scenarios, in this particular case the differences most likely result from the forecasted decline in aircraft operations from 2016 to 2025 presented in Appendices A and J of the Draft EA/EAW.</p>
4/17/2018	Vincent	Anderson	Email	54BG	<p>On page 5-21 in the second to the last paragraph MAC uses the term 'likely' when discussing the impact of lighting on residential areas. Likely is a term hard to measure.</p>	<p>The referenced statement on Page 5-21 reads "lighting impacts from the MIRL and PAPI will likely be minimal given their location and steady illumination." The report acknowledges that light emissions associated with the REIL systems are expected to present greater potential for impacts, because they are directional strobing lights, and therefore considers several options for mitigating these impacts. These options will be considered further during project design.</p>
4/17/2018	Vincent	Anderson	Email	54BH	<p>Note also in this paragraph the discussion MAC uses the term 'sometimes' when considering adding baffles or solid fence. Certainly with MAC's expertise in airport operation they would have a more definitive discussion of this impact. I submit that solid fencing is a less desirable option and it results in visible pollution 24 hours a day, 7 days a week.</p>	<p>See General Comment Response E</p>
4/17/2018	Vincent	Anderson	Email	54BI	<p>I disagree with the conclusion(s) and statements reached in the first paragraph on page 5- 22. Airport location is more likely determined by the beacon rather than runway lights, and when a pilot is on final that pilot is more likely to be considering a</p>	<p>While one of the beacon's primary functions is to aid in airport identification, the beacon provides a limited amount of information regarding airport configuration or layout. By comparison, runway and taxiway lighting provides additional situational awareness and aids in specific</p>

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					safe landing rather than worrying about reducing intensity of runway lighting.	runway identification. Once the airport is identified and the pilot is beginning the approach, high intensity lighting may impact depth perception or otherwise be disorienting. Therefore, part of ensuring a safe landing often includes reducing the intensity of runway lighting before being situated on short final.
4/17/2018	Vincent	Anderson	Email	54BJ	There is no discussion of the likely impact on vehicle traffic suddenly encountering the high intensity lights when traveling the revised 30th street. I submit this could contribute to an accident. The vehicle driver has no control over or notification of when the high intensity lights are illuminated.	The existing Runway 32 end currently has a REIL system in place approximately 400 feet from 30th Street North. The proposed action would replace this system at the new Runway 32 end, which will be 1,000 feet or more from most portions of the realigned 30th Street. Therefore the new lighting systems would be located further from 30th Street North than in the existing condition. The light emissions mitigation options presented in the Draft EA/EAW have the potential to further reduce any adverse impacts of these lights on passing motorists, and will be considered further during project design.  See also General Comment Response E
4/17/2018	Vincent	Anderson	Email	54BK	When considering the buffer between the impervious surface and a wetland more permits for setback will likely be necessary beyond just VBWD and MDNR as I pointed out earlier. This is specifically in relation to the changed location of 30th street.	Based on initial review of wetland fill activities described in Section 5.14.1 in the Draft EA/EAW, all applicable setback requirements can be met within the estimated areas of wetland impact identified in Figure 5-4. These setback requirements will be incorporated into the project during final design and permitting. This has been clarified in Section 5.14.1 of the Final EA/EAW.
4/17/2018	Vincent	Anderson	Email	54BL	I doubt the calculation of 'Grassy Area' increasing on Table 5-5 (Page 5-25) especially in light of construction of a longer cross wind runway, a new primary runway and a new full length taxiway over land now 'grassy.'	The projected increase in Grassy Areas under the preferred alternative results primarily from current agricultural, wooded, and wetland areas being converted to turf grass surrounding the planned runways and associated taxiways.
4/17/2018	Vincent	Anderson	Email	54BM	Page 5-28 in the 2nd paragraph ahead of paragraph 5.14.3 there is a discussion of	Planting trees is recommended by the U.S. EPA as potential green infrastructure for



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					planting trees. It seems trees are generally incompatible with airport operation.	addressing stormwater issues from increased storm frequency and intensity associated with climate change. The MAC does not propose to plant trees that may become aeronautical hazards under FAA criteria.
<b>4/17/2018</b>	<b>Vincent</b>	<b>Anderson</b>	<b>Email</b>	<b>54BN</b>	Based on my discussion of noise previously and what appears to be falsification of noise contours I object to 'None' as the determination of noise impacts in Table 5-8 Page 5-32.	See General Response Comment D and the responses to previous comments 54BB, 54BC, and 54BF above regarding data inputs to the AEDT model. Because the 65 DNL contour would be contained entirely on Airport property under the preferred alternative, the FAA criteria establish that there will be no significant aircraft noise impacts under the no-action or preferred alternatives.
<b>4/17/2018</b>	<b>Vincent</b>	<b>Anderson</b>	<b>Email</b>	<b>54BO</b>	In conclusion, based on the amount of new data, changes in methodology and questionable presentation I submit that the plan itself (LTCP) ought to go back for revision and approval and further I request that a full EIS be prepared even if a new LTCP is not ordered.	See General Comment Response T
<b>4/17/2018</b>	<b>Stephen</b>	<b>Buckingham</b>	<b>Email</b>	<b>55A</b>	I live in Baytown Township and I am opposed to the proposed plan to expand Lake Elmo Airport for numerous reasons. I will describe a few of them below.	Comment noted.
<b>4/17/2018</b>	<b>Stephen</b>	<b>Buckingham</b>	<b>Email</b>	<b>55B</b>	In the early 1990's were told that there had been plans to expand the Lake Elmo Airport, but that the then current usage did not justify the expenditure. Now the number of flight operations are fewer than in 1990 and are projected to reduce further in the future but we are told that expansion is necessary. This is an unjustified and unnecessary expenditure of millions of dollars.	See General Comment Response J(iv)
<b>4/17/2018</b>	<b>Stephen</b>	<b>Buckingham</b>	<b>Email</b>	<b>55C</b>	We have learned many times through this process that we cannot trust statements made by MAC. For example MAC has repeatedly told us that no taxpayer money would be used on the expansion of the Lake Elmo Airport. During one meeting of the CEP both MAC representatives and pilots at the	See General Comment Response R

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					<p>meeting that all funding would come from user fees charged to persons using the Lake Elmo Airport. Commissioner Madigan repeated this claim in a private conversation following the Public Hearing on April 4. This claim is untrue for at least two reasons. First MAC intends to obtain funding from the FAA. That is clearly funded by federal taxpayers. In that private conversation Commissioner Madigan again stated that all MAC funds came from airport user fees but when pressed on the subject he admitted that those funds included passenger fees charged to those using commercial airlines out of MSP and not just pilots using the Lake Elmo Airport. No doubt these fees also include fees charged to airlines using MSP that are also reflected in ticket prices. Those are all certainly taxes. Mr. Madigan said that he was only referring to property taxes. That's a very limited view of what is a tax. When Mr. Madigan and I were classmates in law school we were required to take classes in tax law and those were not limited to, or even primarily directed to, property tax. He should know that there are taxes other than property taxes.</p>	
4/17/2018	Stephen	Buckingham	Email	55D	<p>As others have said, the pilots at the Lake Elmo airport are asking passengers on commercial flights at MSP to help pay for their hobby in Lake Elmo.</p>	See General Comment Response J(iii)
4/17/2018	Stephen	Buckingham	Email	55E	<p>MAC established the Community Engagement Panel ("CEP") with the ostensible purpose of obtaining input from the community. I have been a member of the CEP. The problem is that MAC had decided what it wanted to do before the CEP was established. At the first meeting we were told the "Purpose and Need" for the airport expansion. They were clearly set up such that MAC's chosen outcome was the only possible one to meet them. Those Purpose and Need only take into account the desires</p>	See General Comment Response I(i)

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					of less than 200 pilots using the airport and not the community residents.	
4/17/2018	Stephen	Buckingham	Email	55F	We were not given a chance to have input into or even comment on the Purpose and Need. The only part of the Purpose and Need that addressed the interests of anybody other than airport users was number 2 under Purpose that stated "Enhance safety of airport users <b>and the general public</b> ".	See General Comment Response J(i)
4/17/2018	Stephen	Buckingham	Email	55G	number 2 under Purpose that stated "Enhance safety of airport users <b>and the general public</b> ". Unfortunately MAC's proposal does just the opposite of this. 30th Street is a well travelled, unlighted, country road. After a snowfall the snow on 30th Street is quickly packed down and the street will remain snow and ice packed for days or even weeks depending upon the temperatures. Driving on it even as now configured can be a frightening experience. Introducing a hairpin curve with a relatively steep hill will significantly increase the danger for the general public driving on this street. This effect will be exacerbated by the increased snow drifting that will be caused by MAC's removal of 20 acres of trees. This MAC's plan does not meet its own stated Purpose.	See General Comment Response B(i)
4/17/2018	Stephen	Buckingham	Email	55H	Finally as a concerned citizen and a member of the CEP representing Baytown Township, I have been heavily involved in this process. At the CEP we were, at times, allowed to comment on plans, but those comments were ignored. MAC officials have refused to answer straightforward questions and have answered others with half truths that omitted important details. At the public hearing on April 4 the final speaker stated that the project for the expansion of the Lake Elmo Airport has been the most transparent that MAC has ever undertaken. That may well be true but, if it is, that should not be taken as a	See General Comment Response I(i)

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					compliment to how MAC has handled this matter but rather as a condemnation of how MAC has operated in the past.	
4/18/2018	Cliff	Wells	Email	56A	I am writing this letter to state why I feel the airport commission needs to go ahead with their current plan. I know that there are a lot of naysayers that would like nothing better than for us to relocate to New Richmond, or just cease to exist completely. I would remind them that the airport was there before they were and as a reliever airport for MSP, its needs are justified.	Comment noted.
4/18/2018	Cliff	Wells	Email	56B	The runway lengthening is badly needed for both runways. As it is now, there have been times on a winter night when I had to land after everyone was home for the night and because of low hanging clouds (which is often the case), I had to do a GPS approach to rwy 32 and accept a tailwind for landing because the low clouds didn't allow me to circle to land on rwy 14 (which the winds did favor). And in the winter, that is a scary prospect.	Comment noted.
4/18/2018	Cliff	Wells	Email	56C	What is badly needed as well is usable instrument approaches to all of the runways. Currently there is just the GPS 32 and (ADF 04 which is an antiquated system that most new aircraft don't even have the capability to utilize)...my Cirrus aircraft as an example. With the FAA moving forward with the NextGen concept and all of the computer capabilities that are now afforded them...there really isn't much of a reason to not have GPS approaches to all of the runways.	Comment noted.
4/18/2018	Cliff	Wells	Email	56D	There was an individual at the last meeting that complained about noise. This is totally unacceptable. Those new homes that have been built and those that are still being built have absolutely no grounds to stand on and belly ache about noise. When they moved in, unless they drove to their new place with horse blinders on, there is no way they	See General Comment Response D



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					missed the fact that they were buying a home next to an airport. And the developers, I'm sure to cover their own butts, made sure there was some sort of clause in the purchase agreement acknowledging the near by airport.	
4/18/2018	Denise	Cornell	Email	57A	I am writing in response to the Lake Elmo Airport Expansion in which I am totally against and to the re-routing of 30th Street due to the airport wanting to lengthen runway 14/32	Comment noted.
4/18/2018	Denise	Cornell	Email	57B	the airport would have the potential of bringing larger aircrafts & additional helicopters to this recreational airport.	See General Comment Response A(i)
4/18/2018	Denise	Cornell	Email	57C	At one of the MAC informational meeting it was said they don't monitor what flies in or flies out so a larger airplane or jet could fly in.	See General Comment Response A(i)
4/18/2018	Denise	Cornell	Email	57D	I am asking for the study and data that supports the claim that MAC has stated that this improvement has monetary advantages to West Lakeland residences?	See General Comment Response J(i)
4/18/2018	Denise	Cornell	Email	57E	What about the potential loss of home value our home will be located in "Zone A"?	See General Comment Response K and S
4/18/2018	Denise	Cornell	Email	57F	What about the noise and runway lights that will be aimed at my house since you will have cut down trees that block it today?	See General Comment Response M(ii)
4/18/2018	Denise	Cornell	Email	57G	With the runway lengthen we will be 700 feet closer to the end of the runway and by removing trees and disrupting the habitat which includes many deer, coyotes, foxes, many kinds of birds and other small animals where will they relocate?	See General Comment Response L(i)
4/18/2018	Denise	Cornell	Email	57H	I have concerns about the potential water runoffs from these runways that could potentially put chemicals in our wells. We are very concern about our drinking water as it is because most residents in and around the airport are already having their wells tested every couple of years because we are in a well advisory area due to (TCE). What kind of guaranteed do we have that by disrupting the land around our homes that these	See General Comment Response N

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					contaminates won't find their way into my well that so far is free of TCE?	
4/18/2018	Denise	Cornell	Email	57I	Also since chemicals such as deicing, fuels & other cleaners are used at the airport now & with the potential of having larger airplanes at this airport housed there how are we guarantee over the years these chemicals will not show up in our wells?	See General Comment Response N
4/18/2018	Denise	Cornell	Email	57J	We built 31 years ago understanding that the airport was here and that the acreage around our home was yet not developed. Back then I could ride my horses on Neal Avenue & 30th Street as this is my hobby, however, over the years the land was develop, more cars drove down our street and it was no longer safe for me to ride on the street so I had to make a change and find alternatives if I wanted to continue my hobby. I did not go to the township and request that they change roads, or stop developing because of my hobby. I don't have a problem with pilots wanting to enjoy their hobby of flying airplanes however I do not believe that I should have to subsidize their hobby or one's flying business.	See General Comment Response J(iii)
4/18/2018	Denise	Cornell	Email	57K	If they don't feel safe landing their airplane at Lake Elmo Airport there are other airports within 20 miles. Those being New Richmond and Holman Field, these airports could easily satisfy their needs without much effort.	See General Comment Response C(i) and C(ii)
4/18/2018	Denise	Cornell	Email	57L	Why spend so much of our tax money on just a few pilots?	See General Comment Response J(i)
4/18/2018	Denise	Cornell	Email	57M	I especially feel that government funds that goes towards this project to only benefit the few pilots at the cost of many taxpayers does not warrant this expansion particularly when there is an airport that is 30 some minutes away. When a representative from the Chambers of Commerce of New Richmond stands before you at a Public Hearing on April 4th and stated that their airport could handle the request made by your pilots for a longer runway	See General Comment Response C(i) and R

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4/18/2018	Elizabeth	Buckingham	Email	58A	I am writing this to let the public know that MAC has treated neighbors surrounding the Lake Elmo Airport who oppose 1965 expansion plan with arrogance and condescendence. [...] I keep remembering an airport meeting I attended in 2016 at Baytown Township Town Hall when a senior MAC representative (now retired) pointed finger in the face of a friend of mine while I stood next to her telling her there will be no negotiations on expansion. It was offensive and unnecessary.	See General Comment Response I(iii)
4/18/2018	Elizabeth	Buckingham	Email	58B	It is reflected by the majority of the pilots' unprofessionalism towards neighbors.	See General Comment Response Q
4/18/2018	Elizabeth	Buckingham	Email	58C	I have also witnessed MAC's behavior at Community Engagement Panel ("CEP") meetings. When residents were allowed to ask questions Mead & Hunt's response was that topic was already addressed and moved on by saying there will be no further discussion on that. The whole purpose of the CEP was to address issues from both sides and that was clearly not done. Instead, MAC presented its Purpose and Need and never deviated. It was unfortunate to hear this was MAC's first CEP since its inception at the Public Meeting on April 4, 2018. MAC has a nationwide reputation for having the worst communications skills with the public of any airport management authority in the country.	See General Comment Response I(i)
4/18/2018	Elizabeth	Buckingham	Email	58D	When moved to St Croix Valley we <u>did</u> <u>research</u> the airport and inquired if there was any possibility of it becoming larger and everyone told us that would never happen. Even at MAC meetings throughout the 90's it abandoned its expansion plans. We respect the existing airport; <u>as is</u> , but, lengthening runways and bringing in larger aircraft will disrupt our communities.	See General Comment Response A(i), G and I(iii)
4/18/2018	Elizabeth	Buckingham	Email	58E	If the aging pilots want an expansion, they should pay for it themselves. My user fees at MSP will be used to fund this ridiculous expansion plan and I adamantly object. FAA	See General Comment Response R

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					funds used on this expansion plan are also my taxpayer money.	
4/18/2018	Elizabeth	Buckingham	Email	58F	Pilots choosing to hangar at Lake Elmo knew of the runway length when they signed up. The airport was built in 1951. Homes have been encroaching towards the airport ever since.	See General Comment Response F(iv)
4/18/2018	Elizabeth	Buckingham	Email	58G	We all know there is Holman Field in St Paul and the New Richmond, Wisconsin airport for use is pilots feel it necessary to have longer runways within a short drive distance.	See General Comment Response C(i) and C(ii)
4/18/2018	Elizabeth	Buckingham	Email	58H	Re-routing and building a sharp dangerous curve on 30th St, a major access route, to accommodate pilots is wrong by endangering neighbors unnecessarily with worsened roadways.	See General Comment Response B(i)
4/18/2018	Elizabeth	Buckingham	Email	58I	MAC should keep its Expansion within its current fenced footprint.	See General Comment Response C(iii)
4/18/2018	Elizabeth	Buckingham	Email	58J	PS. I expect a personal written reply from MAC.	See General Comment Response U
4/18/2018	Lori	Gergen	Email	59A	As a resident of West Lakeland Township, I am adamantly opposed to any expansion and/or improvements of the Lake Elmo Airport that would extend past the land that is currently fenced or disrupt surrounding properties in any way.	See General Comment Response C(iii)
4/18/2018	Lori	Gergen	Email	59B	Since the expansion has been in the LTCP for many years, it is clear that the MAC should have moved forward many years ago. The window of opportunity has passed. In the meantime, the area continues to become more densely populated thanks to mandates from the MET Council and the airport is now basically landlocked.	See General Comment Response H
4/18/2018	Lori	Gergen	Email	59C	This proposed expansion/improvement may be considered by some as relatively small, but it does not make sense because there simply is not enough room here to do so	See General Comment Response F
4/18/2018	Lori	Gergen	Email	59D	nor it is not fiscally responsible [to follow through with this plan]	See General Comment Response J(i) and R
4/18/2018	Lori	Gergen	Email	59E	There must be planes that are safe to use on the current runway lengths, or there would be no airport, period.	See General Comment Response P



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4/18/2018	Lori	Gergen	Email	59F	<p>MAC has stated on numerous occasions that the goal of this expansion is not to attract more or larger planes.....that said, the current use of the airport does not warrant the expansion proposed by MAC not to mention the waste of fiscal dollars and the disruption to the community. This project is budgeted to cost \$11.5 million which is unjustifiable given current usage of this airport, the continuing decline of hobby pilots. If the runways can be lengthened within the current fenced area, perfect, otherwise, rebuild the ones that are currently deteriorating to keep the pilots, and for that matter, surrounding residents safe. Then let any pilots, especially those of larger aircraft take advantage of the other nearby FAA Airport options that are already set up for their use.</p>	<p>See General Comment Response C(iii), J(i), J(iv), and R</p>
4/18/2018	Lori	Gergen	Email	59G	<p>This my third letter to go on record in opposition to the proposed expansion and/or improvements at the Lake Elmo Airport, the first dated and submitted September 16, 2015, the second, March 9, 2016. I know there are still many residents that are unaware of this proposal. There are other neighbors that feel there is no way MAC would move ahead with such a preposterous project, so they have not followed the matter. I, on the other hand along with some of whom are much more involved, have continued to spend uncountable hours away from my family, be it collecting and comparing information or consistently attending meetings regarding this expansion be it in the neighborhood, at the Town Board, County Board, MAC led presentations, privately meeting with MAC representatives, or attending Listening Sessions. It has been an uninvited burden-but one of most significance. I am modeling to our children how to be present, involved, informed, and ultimately to stand up for what is right. This</p>	<p>See General Comment Response I(i)</p>

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					<p>whole process has been crowned as MAC being transparent and inclusive of all stakeholders. It is true that they have held listening sessions, community presentations, created the CEP, sent out letters, updated their website, etc. of which I understand is unprecedented, but their procedures are still falling short. They have not listened to the voices of opposition, they have misrepresented and skewed data, and avoided direct answers. Even worse they are forging ahead and trying to mitigate opposition by taking advantage of the political power and lack of accountability of their organization.</p>	
4/18/2018	Lori	Gergen	Email	59H	<p>The only stakeholders to gain benefit from this expansion are the MAC itself and a handful of pilots that use this airport. I expect there are other entities involved, maybe even government, that will benefit somehow-maybe even something to do with the widening of Manning Avenue and other area improvements, only they know. That said, I have been raised to trust government and appointed committees. I was raised to know they are good people of whom are well educated and will do what is right for the majority. Well, I am honestly beginning to second guess that premise as I am raising our family and find myself becoming more and more involved in our community. Honestly, I am fearful as I have seen first hand that sadly, the adage of "follow the money" seems to stand true. I would honestly like to be able to continue to believe and trust the former.</p>	See General Comment Response J(i)
4/18/2018	Lori	Gergen	Email	59I	<p>I am also writing as a concerned resident. I heard Mr. Patrick Flemming, a speaker at the latest listening session, share his story and I have become troubled. He identified himself as a Lake Elmo resident, a pilot of a Cherokee 6 and is a regular user of the Lake Elmo Airport. According to Mr. Flemming, he</p>	See General Comment Response F(v)

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					<p>cannot take off here under certain circumstances with a full tank of fuel at the Lake Elmo Airport due to the short length of the airstrip. He stated he will not land anywhere without a minimum runway length of 3000 feet, but he uses this airport because he knows it so well. This is not keeping safety first. As a pilot, it is his responsibility to follow protocol and full safety measures. It is his responsibility to land at an airport that offers runways that fall within the guidelines of the particular aircraft and which he feels safe, not just familiar. There should not be any craft on site or utilizing the Lake Elmo Airport, or any airport, for that matter, if they are doing so without keeping safety first. The pilots that utilize the Lake Elmo Airport and house their aircraft here were fully aware of the limitations of the facilities when they decided to do so. A want or wish does not create a need. No pilot should not be using this airport if their craft is not designed for use at the current set up. Mr. Flemming's speaking out also raises my question of how many other pilots are so negligent with their personal safety as well as the surrounding neighbors? What is done from the MAC perspective to truly assure safety for all?</p>	
4/18/2018	Lori	Gergen	Email	59J	<p>MAC has outlined their "PURPOSE and NEED" for this project which was which has driven this projected expansion/improvement. The real facts have been difficult to find regarding the usage of this particular airport to substantiate any real need.</p>	See General Comment Response J(i)
4/18/2018	Lori	Gergen	Email	59K	<p>MAC has stated that there are some 25,000 operations each year, including the flight school touch and goes. If this airport ran 24 hours a day, 365 days a year, that would be one flight operation every 20 minutes. Given the honored hours for airport usage are much shorter, that only increases the numbers per hour, which I can honestly say</p>	See General Comment Response O(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					is not the case. As far as hangar use, I believe we were told by MAC that there are only about 200 crafts housed on site. I simply do not understand how the hobby of a few can have so much bearing on an entire community.	
<b>4/18/2018</b>	<b>Lori</b>	<b>Gergen</b>	<b>Email</b>	<b>59L</b>	It is clear the MAC's PURPOSE is biased to mainly to attract more flights and pilots and then to improve the airstrip for safety at the same time. MAC does seem to be expanding their vision to larger aircraft and business flights and increased usage of this airport to keep it sustainable and viable, yet they claim this is not the case.	See General Comment Response A(i)
<b>4/18/2018</b>	<b>Lori</b>	<b>Gergen</b>	<b>Email</b>	<b>59M</b>	There have been recent articles in local papers stating that the hobby of flying has been decreasing exponentially, and the use of MAC air-ports continues to decline.	See General Comment Response J(iv)
<b>4/18/2018</b>	<b>Lori</b>	<b>Gergen</b>	<b>Email</b>	<b>59N</b>	Being there are other airports within a reasonable vicinity that are already fully equipped to facilitate any planes that are not safely serviced by the current layout, there is no true NEED to make such changes to this little airport. New Richmond, being one of the best options has been publicly vocal about their desire to welcome any new air traffic and pilots, and planes. They are seeing increased use of their facility, and since there are federal monies at stake, feel the dollars would be better utilized there as they are also seeking FAA dollars for improvements.	See General Comment Response C(i)
<b>4/18/2018</b>	<b>Lori</b>	<b>Gergen</b>	<b>Email</b>	<b>59O</b>	The "NEED" actually seems to lie in dollars somewhere. I am in no way educated in politics, but it is clear that this entire project is politically based and biased-but to whom, I am unsure. I do know it is not biased in any way toward the citizens that reside here, nor to the pilots that that simply want the current runways upgraded and repaved within the currently fenced area for safety, nor those that enjoy the small airport for its nostalgic and hobby feel and count on safe airspace	See General Comment Response I(i)



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					for newly licensed pilots to practice and hone their skills.	
4/18/2018	Lori	Gergen	Email	59P	I also know for a fact that not all pilots agree with the view that extending runway length will make it safer for all because an increase in air traffic and variance of aircraft using the runways will cause other safety issues.	Comment noted.
4/18/2018	Lori	Gergen	Email	59Q	My husband has owned our 5 acre property on the corner of 30th Street and Neal Avenue since around 1994. When he purchased here, he saw the Lake Elmo Airport as an asset to the area. He asked about the future of the airport, and was told unequivocally that it would stay within the currently occupied space. We were married in 1999, and as our family grew, we looked into moving but ultimately decided to build a new larger home on the same property. Before building, we once again inquired with city planners regarding the airport before making another significant financial investment. Since then, the perimeter fencing was installed surrounding the airport, which seemed to solidify the communications. Then in July of 2015, what seems out of nowhere and completely by happenstance, we heard of this LCTP expansion/improvement proposal in which not only would the airport and runways expand, but the road we travel on multiple times each day would be significantly altered to accommodate that improvement.	See General Comment Response I(iii)
4/18/2018	Lori	Gergen	Email	59R	In lieu of utilizing the new hairpin curve on 30th Street, the traffic will likely be thwarted onto thoroughfares in the adjacent neighborhoods which were not built to accommodate such high usage.	Given the lack of alternate direct routes from west to east and vice versa, the MAC does not expect that the additional 46 seconds of travel time required to use the realigned segment of 30th Street will have a significant impact on local travel route choices.  See General Comment Response B
4/18/2018	Lori	Gergen	Email	59S	The rural view of trees and wildlife will be cleared to facilitate a new runway.	See General Comment Response M(i)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/18/2018	Lori	Gergen	Email	59T	This new runway would not only be visible out the front of our home where we currently enjoy a peaceful view, but it will also be lit and strobed.	See General Comment Response M(ii)
4/18/2018	Lori	Gergen	Email	59U	I can not imagine this type of adjustment to landscape will improve our property value in any circumstance, which buy the way, we are counting on for our future endeavors for our family. Actually, I have recently been made aware by realtors of projections of a 20% decline in property value if this expansion happens.	See General Comment Response K
4/18/2018	Lori	Gergen	Email	59V	We don't want to move. Our brother in law built our home full of love. This is the home and property of which we plan to stay in until retirement, and possibly one day, pass down to our children. We love the small hobby planes and culture the Lake Elmo Airport brings. It is a great addition to the neighborhood. We do NOT, however, agree with it OVERTAKING the neighborhood nor endorse this expansion that is unwarranted and muchly disruptive to the area and community in which we chose to raise our family.	See General Comment Response G
4/18/2018	Lori	Gergen	Email	59W	I remain hopeful that there is one person of whom will become aware of this situation and do the right thing. That one person will be the right one to put a stop to the push and unnecessary and irresponsible spending of federal dollars and put a halt to the Lake Elmo Airport expansion once and for all. Is that person you?	Comment noted.
4/18/2018	John	Regenold Jr	Email	60A	Let me first start off by saying that I am in support of the runway expansion at Lake Elmo.	Comment noted.
4/18/2018	John	Regenold Jr	Email	60B	I have been flying at Lake Elmo for 20 years. I believe that this expansion is necessary to improve safety for both pilots and the surrounding community	Comment noted.
4/19/2018	Elizabeth	Buckingham	Email	61A	Why has FAA allowed MAC to lease acreage for agricultural use on properties it owns and operates as an airport in Lake Elmo?	See General Comment Response F(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					Certainly you've heard of Captain Sully of American Airlines landing on the Hudson River story. There are FLOCKS of birds on your property when corn or other crops are planted. Year round there are migratory birds on MAC property feeding off of the crops and also because of the wetlands and woodlands.	
4/19/2018	Elizabeth	Buckingham	Email	61B	Your 1965 expansion plan has expired and you've abandoned the plan previously.	See General Comment Response H
4/19/2018	Elizabeth	Buckingham	Email	61C	MAC took property south of 30th Street North in West Lakeland Township by eminent domain in 1969 and has never used it in 49 years other than to allow more crop leasing and habitat for wildlife. That property should rightfully be returned to the previous owner.	See General Comment Response G
4/19/2018	Elizabeth	Buckingham	Email	61D	We've explained our concerns about our homes being devalued by your actions and by the re-routing of 30th Street North but you don't listen to our major road access or devaluation issues.	See General Comment Response B and K
4/19/2018	Elizabeth	Buckingham	Email	61E	MAC doesn't care about its neighbors, it cares about itself. All MAC has ever done is tell us what it claims it needs, never listening to neighbors. None of the MAC personnel live in our communities of Baytown Township, West Lakeland Township or the City of Lake Elmo, as Bridget Rief, Vice-President, pointedly told us at the West Lakeland Township meeting in early 2016 at Oak-Land Middle School.	See General Comment Response I(i)
4/19/2018	Elizabeth	Buckingham	Email	61F	Another example of MAC's uncaring attitude reflects on what the cyclone fencing looks like along 30th Street North. You recklessly don't take care of it like you do the cyclone fencing on the west side of your property along Manning Avenue North. Now you say you want to place a privacy wall on the south side of 30th Street North but we are not looking forward to what that may look like if it's installed or how it will be maintained.	Comment noted.

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Elizabeth	Buckingham	Email	61G	I also remember a severe storm hit our area and there was storm damage done to hangars at the Lake Elmo Airport and winds blew a lot of airport debris to property south of 30th Street North. We also had storm damage on our property. Did MAC go out and clear the hangar debris...no. It was an eyesore sight until neighbors picked up the ditch/shoulder debris on MAC's property. Does this reflect MAC is a good neighbor?	Comment noted.
4/19/2018	Elizabeth	Buckingham	Email	61H	MAC says no salt is used at the Lake Elmo Airport but it's building a salt storage shed with my taxpayer monies. When questioned about the salt storage shed and the usage of salt at the airport, MAC officials clarified themselves by saying salt is not used on runways. Later the same officials said, in private conversations, that salt will be used on the roadways allowing it to then leech into the already contaminated soil?	The construction of a materials storage building at the Airport is not funded by local property or sales taxes.  One of the industrial activities the MAC undertakes at the Airport with potential to impact storm water runoff is pavement deicing. Below are some best management practices the MAC employs under the current SWPPP to reduce the potential for storm water impacts due to pavement deicing: utilize mechanical means to remove snow and ice from pavements to reduce use of pavement deicer; pavement deicer is stored indoors; deicer application rates are reviewed annually to optimize rates and prevent over-application; employees are trained annually regarding application rates to reduce potential for over-application.
4/19/2018	Elizabeth	Buckingham	Email	61I	PS. I expect a personal written reply from MAC.	See General Comment Response U
4/18/2018	John	Regenold	Email	62A	I just wanted to send off a note to let you know how important Lake Elmo Airport is to me & our family. We have been flying out of Lake Elmo since the late 1960s & supported the FBOs family business. Our family has a hangar on the field & we support EAA & Fly Young Eagles.	Comment noted.
4/18/2018	John	Regenold	Email	62B	Safety is always a concern and runway expansion would be very welcomed and a great improvement for pilots and surrounding community	Comment noted.



Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/18/2018	Brad	Cornell	Email	63A	I am writing in response to the Lake Elmo Airport Expansion in which I am totally against and to the re-routing of 30 th Street due to the airport wanting to lengthen runway 14/32 in which the airport would have the potential of bringing larger aircraft & the flight path closer to our home.	See General Comment Response A(i)
4/18/2018	Brad	Cornell	Email	63B	This airport has been perceived and used as a recreational airport for the past 31 years that we have lived in West Lakeland.	See General Comment Response A(ii)
4/18/2018	Brad	Cornell	Email	63C	The MAC representatives have said they do not monitor what nor do they control what flies in or out of the airport.	MAC maintains a voluntary noise abatement plan at the Airport that prescribes preferred flight procedures, preferred runway use, designated maintenance run-up areas, and nighttime training procedures for minimizing aircraft noise exposure in noise-sensitive areas surrounding the Airport. To view the Noise Abatement Plan for Lake Elmo Airport, visit <a href="http://www.macnoise.com/other-mac-airports/lake-elmo-airport-21d">www.macnoise.com/other-mac-airports/lake-elmo-airport-21d</a> . The MAC has also installed “fly neighborly” signs around the Airport and provides resources such as pilot briefings and guides to educate Airport users about the importance of minimizing noise effects to Airport neighbors. In addition, the MAC encourages tenants at Lake Elmo Airport to follow the voluntary Noise Abatement Plan for the Airport and takes its responsibility to respond to community concerns seriously. The MAC plans to establish an airport advisory commission to track trends in aircraft operations and aircraft noise complaints to address future concerns about noise and noise abatement at the Airport. In addition, the MAC will update the existing voluntary noise abatement plan and hold educational briefings for pilots to help reduce noise. MAC also manages a website and operates a noise complaint and information hotline for all its airports. For information

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						<p>about noise programs, view airport operations, or file noise complaints, please visit <a href="http://www.macnoise.com">www.macnoise.com</a>.</p> <p>However, there are many circumstances when noise impacts from the Airport cannot be abated. Federal grant provisions require that the Airport be operated in a manner that does not discriminate on the basis of type or class of aircraft or aviation activity and does not restrict or place an undue burden on interstate commerce. As a “public-use” airport, Lake Elmo Airport is subject to federal regulations. A congressional act passed in 1990 (the Airport Noise and Capacity Act) limits the ability of airport operators to impose access or use restrictions based on aircraft noise. As a result, airport operators cannot restrict aircraft operations at an airport (such as closing the airport to jets or closing it at night) to control noise. Today, any U.S. airport that employs access or use restrictions designed for noise control had them in place prior to the 1990 act and were grandfathered in by Congress.</p>
4/18/2018	Brad	Cornell	Email	63D	How is it that MAC updates a long term comprehensive plan, expecting the townships to just ok it and change zoning around the airport when the airport is no longer compliant with the zoning already established for 60 years?	See General Comment Response F(ii)
4/18/2018	Brad	Cornell	Email	63E	The townships long term comprehensive plans are the ruling documents at the local level not the other way. Why is it that MAC never attended any planning meetings or public hearings when land around the airport was being developed?	As an adjacent jurisdiction, the MAC reviews and comments on proposed development activity in the vicinity of Lake Elmo Airport. On several occasions, the MAC has provided written comments expressing concern with several aspects of residential development near the airport, including the potential for aircraft overflights and noise as well as the potential for stormwater ponds to attract

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						wildlife. The MAC's written comments also requested that prospective property buyers be provided information about the properties' location relative to the Lake Elmo Airport, existing aircraft operations over the area, and the fact that the MAC plans include construction of a realigned and longer primary runway and an extension to the crosswind runway. See also General Comment Response I(iii).
4/18/2018	Brad	Cornell	Email	63F	How is it that MAC has spent almost a million dollars preparing for this long term comprehensive plan, having an Environmental impact study done prior to the plan being accepted by the townships?	<p>The MAC's Long-Term Comprehensive Plans are adopted by the MAC full Commission and the Metropolitan Council must review the plan and determine whether or not it is consistent with the regional Transportation Policy Plan (TPP), which includes the Regional Aviation System Plan. There are no requirements for local communities to formally approve the MAC's Long-Term Comprehensive Plans. That said, the MAC understands and values the importance of involving surrounding jurisdictions in long-term planning and environmental reviews of airport improvement projects. The MAC involved surrounding jurisdictions in the long-term planning and environmental review processes. MAC staff met with community leaders prior to any formal action taken on the Lake Elmo Airport 2035 Long-Term Comprehensive Plan and continued to hold meetings and events throughout the planning process and environmental review. As a result, the following adjustments were made:</p> <ul style="list-style-type: none"> <li>- Altering plans to realign 30th Street based on community feedback, so that it will tie in with the existing four-way intersection at Neal Avenue</li> <li>- Reducing the proposed length of Lake Elmo's primary runway from</li> </ul>

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						<p>3,600' to 3,500' – still one of the shortest primary runways in the MAC reliever system</p> <ul style="list-style-type: none"> <li>- Attempting to further address 30th Street concerns by proposing a number of other viable configuration options, none of which the community favored over the currently planned alignment with the four-way intersection</li> </ul>
4/18/2018	Brad	Cornell	Email	63G	Why is it that MAC started this plan/project back in 2013 long before coming to the townships to indicate a change from previous plans?	MAC staff met with community leaders prior to any formal action being taken on the Lake Elmo Airport 2035 Long-Term Comprehensive Plan and continued to hold meetings and events throughout the planning process and environmental review.
4/18/2018	Brad	Cornell	Email	63H	Where's the cost analysis to prove that this is good use of FAA money when the airport population has been declining for the past 30 years?	See General Comment Response J(iv)
4/18/2018	Brad	Cornell	Email	63I	Where is the data to prove the statement that larger aircraft won't come to the Lake Elmo Airport after completion? MAC does not have that data, but should have data to support once the airport runway is lengthened, larger aircraft will come to Lake Elmo.	See General Comment Response A(i)
4/18/2018	Brad	Cornell	Email	63J	How can MAC claim the longer runway is needed for safety of the existing users of the Lake Elmo Airport? If it's not safe for the pilots now aren't they in danger of personal injury now? How is it that MAC can claim the local neighbors are safe today when pilots claim it's dangerous to fly out from Lake Elmo Airport? Isn't it the pilots' responsibility to themselves and others to fly safely? If the need for safety is the primary issue, then why has MAC not managed the based aircraft for proper size nor the transient aircraft using the airport for safe operations but allowed miss use? How can MAC put over 1500 users of 30th street at risk with a multi curved road where a straight 50MPH road exists	See General Comment Response P



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					today as a major township road for commuting to and from work every day?	
4/18/2018	Brad	Cornell	Email	63K	Why is it that MAC believes this is not expansion, adding lighting to a non-lit runway, Adding terminal lighting for night operations, Adding more taxi ways, constructing run-up locations near neighbors to name a few new additions that create noise, light pollution that is neither present today nor consistent with the voluntary noise abatement in place today? All of these new additions indicate flight operation expansion heavier use, more noise and disruptive to the neighbors.	See General Comment Response A(i)
4/18/2018	Brad	Cornell	Email	63L	Why it is that MAC can ignore state rules for safety zones wouldn't MAC want to be compliant to both state and federal rules?	See General Comment Response F(iii)
4/18/2018	Brad	Cornell	Email	63M	MAC needs to provide a detailed cost analysis of each alternative in detail, the claim is cost to airport residents is substantial, how much?	As noted in Section 3.3.2 of the Draft EA/EAW, the estimated cost of reconstructing the existing airfield in its current configuration is \$5.4 million. As noted in Section 3.3.3 and Section 3.3.4, the estimated cost for the relocated Runway 14/32 and associated taxiways under Alternative B and Alternative B1 (preferred alternative) are \$9.6 million and \$9.3 million, respectively. As noted in Section 3.2.5, the estimated cost of extending Runway 04/22 is \$600,000. Cost estimates for 30th Street North Alternatives 3, 4A, and 4B are presented in Appendix B of the Draft EA/EAW.
4/18/2018	Brad	Cornell	Email	63N	Provide detailed cost return on investment analysis for the federal money to acquire property over the life of the airport improvements over the life of the airport?	FAA policy does not require a benefit-cost analysis for projects undertaken solely for the objective of safety, security, conformance with FAA standards, or environmental mitigation. Therefore, a benefit-cost analysis is not required for this project.
4/18/2018	Brad	Cornell	Email	63O	Provide the cost benefit between closing and just provide minimal updates? Wouldn't actually closing generate a significant financial benefit for MAC to return this	Because Lake Elmo Airport performs a critical function within the MAC reliever airport system and FAA National Plan of Integrated Airport Systems (NPIAS),

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					unused land back to the owners, 640 acres as prime real estate in the metro area is a substantial dollar amount in land alone, on the order of 256 2.5 acre home sites at a rough retail cost of \$200,000 each is \$51.2 million plenty to assist the current residents of the airport to move to different airports?	closing the Airport without relocating it elsewhere is not a practicable alternative. Relocating the Airport is considered in Section 3.2.2 of the Draft EA/EAW, which states that relocation of the Airport is not practicable or feasible because of land acquisition and other costs associated with construction of a new airport.  See also General Comment Response C(iv)
4/18/2018	Brad	Cornell	Email	63P	The MAC planning team and upper management have been poor neighbors for the past 30 years. The only time they come to our town meeting is to bring planning changes that are not welcome with any consideration to the neighborhood.	See General Comment Response I(i) and I(iii)
4/18/2018	Brad	Cornell	Email	63Q	The pilots at Lake Elmo for the most part are considerate, although there are a few who don't stay in the zones, fly low, wait till late to do night take off and landings to name a few.	See General Comment Response Q.  Some pilots need to conduct specific currency training at night. According to the federal regulations governing pilot certification (14 CFR Part 61), in order for pilots to be able to carry passengers at night, they need to make at least three takeoffs and landings to a full stop in the preceding 90 days during the nighttime. This ensures they keep current on their night takeoff and landing experience.
4/18/2018	Brad	Cornell	Email	63R	The transient users are helicopters from down town to do practice; all they do is create noise, loud noise even at late hours with no regard to neighbors and MAC does nothing about it.	See General Comment Response D.  Lake Elmo Airport does not have an officially designated helipad facility but is open to use by helicopters. The MAC encourages both aircraft and helicopter operators using Lake Elmo Airport to be good neighbors by following the voluntary Noise Abatement Plan and takes its responsibility to respond to community concerns seriously.
4/18/2018	Brad	Cornell	Email	63S	MAC has a noise complaint web site but you have never provided statistics on how many	Each quarter the MAC reports the number of aircraft noise complaints, locations filing

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					complaints or done the research to see who is creating the noise, why is this?	<p>an aircraft noise complaint, number of operations and the aircraft types that have generated noise complaints through an interactive reporting website available here:  <a href="https://www.macenvironment.org/reports/relievers.html">https://www.macenvironment.org/reports/relievers.html</a>.</p> <p>The MAC plans to establish an airport advisory commission to address future concerns about noise and noise abatement at the Airport. These quarterly reports will be shared and discussed with the airport advisory commission.</p> <p>See also General Comment Response D</p>
4/18/2018	Brad	Cornell	Email	63T	I truly believe this project is to bring larger aircraft to Lake Elmo in an attempt to keep it from closing because of continued low of airport users of the past 30 plus years.	See General Comment Response A(i)
4/18/2018	Brad	Cornell	Email	63U	The days of this plan for expansion is long gone, like 60+ years past. It wasn't needed in 1969 it's not needed now with even fewer users. MAC needs to realize this plan is obsolete and the cost of almost a million dollars was a waste and they should accept the existing size, classify as recreational or close it.	See General Comment Response H
4/18/2018	Brad	Cornell	Email	63V	Rebuild the existing runways if needed	See General Comment Response C(iii)
4/18/2018	Brad	Cornell	Email	63W	Remove helicopter support	See response to comment 63R above
4/18/2018	Brad	Cornell	Email	63X	Keep the trees to minimize the light pollution	See General Comment Response M(ii)
4/18/2018	Brad	Cornell	Email	63Y	Solid fence that is proposed is just a bad eye sore.	See General Comment Response E
4/18/2018	Brad	Cornell	Email	63Z	MAC does not even maintain the existing chain link fence; look at the one on 30th street and Neal. This does demonstrate MAC's management does not support this airport being maintained. That is why the runways are in poor condition	The MAC rehabilitated both runways recently. In 2012, a mill and overlay was completed, including joint crack repair, for the center 40-foot pavement section of Runway 14/32. This project was completed to correct uneven conditions in the runway profile and extend the life of the runway at minimal cost. However, this was a short-term improvement, as the pavement will

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						eventually fail and need to be rebuilt. Furthermore, issues remain with uneven pavement conditions during freeze and thaw cycles, causing the Airport to issue notices to airmen (NOTAMs) in 2016 and 2017 cautioning pilots that the runway has uneven pavement breaks in the asphalt due to frost heaves. In 2013, a joint and crack repair project was completed for Runway 04/22, and additional crack sealing for this runway was completed in 2015. For both runways, the recent rehabilitation efforts represent short-term repairs to keep pavement near the end of its useful life in a serviceable condition. This information has been added to Section 2.2.1 of the Final EA/EAW.
4/18/2018	Brad	Cornell	Email	63AA	and only now attempting to justify sending money on the Lake Elmo Airport by expanding the services to accommodate or attract larger aircraft and keep it in the MAC reliever system.	See General Comment Response A(i) The project contemplated by the EA/EAW is being proposed to support use of the Airport by the aircraft using it today. The family of aircraft at the Airport is not expected to change. The reasons for implementing the project are identified in Chapter 2, Purpose and Need. The Airport is owned by the MAC and will be part of the MAC reliever system regardless of the facilities available there.  For more information, see General Comment Response A(i)
4/18/2018	Brad	Cornell	Email	63AB	MAC should return this airport to MNDOT for management where it can be maintained and follow state rules.	MnDOT does not typically own or manage individual airports.
4/19/2018	Lynette	Spitzer	Email	64A	Opposed to project because of encroachment of runways onto 30th Street and Manning Avenue.	Comment noted.
4/19/2018	Lynette	Spitzer	Email	64B	Opposed to project because of rerouting and/or possible vacating of 30th Street	See General Comment Response B
4/19/2018	Lynette	Spitzer	Email	64C	Opposed to project because of loss of trees and natural habitat	See General Comment Response L(i) and M(i)
4/19/2018	Lynette	Spitzer	Email	64D	Opposed to project because of added noise and/or noise pollution	See General Comment Response D



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4/19/2018	Lynette	Spitzer	Email	64E	more noise and light pollution forcing development of a new noise and light abatement policy	See General Comment Response D and E
4/19/2018	Lynette	Spitzer	Email	64F	I am requesting that you acknowledge my concern(s), reconsider your chosen options, and resolve to work with the resident and pilot communities to come to a reasonable and agreed upon solution toward the future of Lake Elmo Airport.	Comment noted.
4/19/2018	Tamra	Roth	Email	65A	I am the daughter of John and Lucille Higbee, who owned the West Lakeland Township acreage MAC took by eminent domain action in 1969. You have done nothing with what you took from my family in 1969.	See General Comment Response G
4/19/2018	Tamra	Roth	Email	65B	Other family members and I live on the remaining West Lakeland Township property and we are totally opposed to any airport expansion.	Comment noted.
4/19/2018	Tamra	Roth	Email	65C	The rerouting of 30th Street North will adversely devalue our properties, directly affect my business and endanger our safety.	See General Comment Response B
4/19/2018	Tamra	Roth	Email	65D	Only rebuild the existing runways within the current fenced footprint.	See General Comment Response C(iii)
4/19/2018	Ann	Bucheck	Email	66A	I attended the hearing on the proposed Lake Elmo Airport expansion at Oakland Middle School, Lake Elmo on April 4, 2018. I read a statement at the meeting and left my statement and questions with the recorder. After the meeting I asked a representative about the impact of the expansion on the residential parcels with structures. I did not understand what legal impact, perhaps zoning, expansion of the home, and /or safety, they would have and still am not completely fully informed. This is important for all of us to understand as the No-Alternative site impacts 2 parcels, Alternative B is 15 and for Alternative B1 it is 13 parcels. Please clarify the legal implications for these landowners now and in the future? How will this impact the surrounding cities?	See General Comment Response F(ii)  As noted in Section 5.9.1 of the Draft EA/EAW, "Effects to existing and planned neighboring land uses were identified in Chapter 3, Alternatives, for the no-action and preferred alternative using the Model State Safety Zones A and B promulgated under Minnesota Administrative Rules 8800.2400 as a guide. Safety Zone A typically prevents erection of new structures, and Safety Zone B typically prevents small lot residential development using density standards." As noted in General Comment Response F(ii), current development in Model Safety Zone B for the proposed airfield configuration is not vastly inconsistent with the density standards set by the model ordinance.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/19/2018	Ann	Bucheck	Email	66B	Continue to feel the expansion is incorrect for a number of reasons	Comment noted.
4/19/2018	Jim	V	Email	67A	I am opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Jim	V	Email	67B	It seems that the proposed expansion / improvements for Lake Elmo airport has had millions of dollars spent on it's necessity since 1965 when it was first introduced. This plan is 53 years old and the MAC planners still can't decide if there should be 2, 3 or 4 runways, lengthen the main, leave the main and lengthen the crosswind, etc., etc., etc. It's no wonder with such indecisiveness that, not only is there not a clear plan on what to do with the "runt" in the MAC nest, MAC can't see their way clear to adopt zoning, bring in sewer and water, clearly classify the airport as utility, intermediate or reliever, or utilize their "gifted" power of eminent domain to keep homes, businesses, cars and trains out of their safety zones.	See General Comment Response H
4/19/2018	Jim	V	Email	67C	MAC staff and pilots frequently ask residents, "Did you know the airport was there when you built or bought your home?" Residents would ask, "Did you know there was a railroad on the north boundary and a road on the south boundary when you built your runway in 1950? Why would you purchase or take land by eminent domain north or south of those pre-existing transportation corridors? It seems that this airport was not built in the right farmers' field back in the 50's.	The areas north of the railroad and south of 30th Street were both purchased to protect the approach/departure area for the relocated Runway 14/32.  See also General Comment Response G and F(iv)
4/19/2018	Jim	V	Email	67D	Request that the no-action option be adopted	See General Comment Response C(iii)
4/19/2018	Jim	V	Email	67E	MAC planners were pretty short-sighted in the dream of expanding from crop dusting planes to micro-jets. It's time to lay this plan to rest and call it a day for this airport. I would request that the "No Action" option be adopted and future plans for development of this airport be suppressed permanently. This airport can and will accommodate all single	See General Comment Response C(iii)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					propeller aircraft and helicopters in the 12,500 lb. classification as is.	
4/19/2018	Jodie	Ballis	Email	68A	I am opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Jodie	Ballis	Email	68B	There will be a definite loss in home values for those of us living within a mile of the airport. The 2015 home values near the airport are: 1 mile radius: 348 parcels valued at \$ 93,997,000.00 and, 2 mile radius: 2103 parcels valued at \$ 823, 642, 900.00 These totals do not include the developments of Easton Village, Village Preserve, Northport, Artisan, or Royal Club.	See General Comment Response K
4/19/2018	Jodie	Ballis	Email	68C	I do believe the state of MN has statues in place to compensate homeowners for loss of value created by the expansion of the Lake Elmo airport The state of MN also supports compensation for loss of trees, wild prairie areas, etc., that would reduce property values.	See General Comment Response S
4/19/2018	Jodie	Ballis	Email	68D	What originally started at 204 planes at Lake Elmo per MAC at the beginning of this LTCP period in June of 2015 is now down to 182 in January of 2018. That is a drop of about 11%. 182 is the projected total of aircraft for 2035. More pilots will leave with the mandatory addition of the ADS-B transponder system in 2020. This expansion is not worth the total disruption of the communities. Lake Elmo airport is very likely to fade itself out over the next 15 year period.	See General Comment Response J(iv)
4/19/2018	Jodie	Ballis	Email	68E	I am requesting that you acknowledge my comment and concerns regarding the MAC'S 2035 LTCP Revised Plan B.	Comment noted.
4/19/2018	Jodie	Ballis	Email	68F	I would also request that the "No Action" option be reviewed and considered as the only viable option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations.	See General Comment Response C(iii)
4/19/2018	Troy	Ballis	Email	69A	I am opposed to runway expansion at Lake Elmo Airport	Comment noted.

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Troy	Ballis	Email	69B	If the MAC proceeds with their Revised Plan B for Lake Elmo airport, longer runways will mean larger planes.	See General Comment Response A(i)
4/19/2018	Troy	Ballis	Email	69C	Unfortunately, per the manufacturers of the planes listed in the MAC 2035 LTCP, the projected runways still won't be long enough and the airport users and residents will be in the same situation we're all in today.	See General Comment Response P
4/19/2018	Troy	Ballis	Email	69D	If the number of pilots and planes [in the 12,500 lb. category) were at capacity at Holman Field, it would make sense to look at other airports to take up the overload, but that is not the case.	See General Comment Response C(ii)
4/19/2018	Troy	Ballis	Email	69E	It does not make fiscal sense to keep repeating expansion projects at airports where twin-engine props and larger planes don't exist. Economic sustainability is based on supply and demand. If nearby airports have the amenities that larger aircraft need, i.e., longer runways, lighted runways, zoning, larger RPZ's, even control towers, then planes larger than single engine props should reside there. That is a pilots first rule of safety, "don't fly into an airport that can't support your plane or that you're not comfortable flying into". Given the amount of federal and state grant monies requested for this project, it is just common sense that it would be more cost effective to divert the category II and III aircraft to airports already built to handle their size per the manufacturer.	See General Comment Response C
4/19/2018	Troy	Ballis	Email	69F	I think it's time that the MAC "No Action" option be adopted as the only option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations.	See General Comment Response C(iii)
4/19/2018	Kate	Kopp	Email	70A	I am opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Kate	Kopp	Email	70B	In the early 1990's, TCE was discovered on Lake Elmo airport property. The primary source was identified as the old machine shop in Lake Elmo. The Lake Elmo airport	See General Comment Response N



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					property was included in the super fund cleanup for TCE . Today there is new PFC water contamination from 3M that has expanded into the city wells in Lake Elmo as well as the residential wells in West Lakeland. How can Mead and Hunt do an environmental study and conclude that there are no environmental impacts? How can the MAC, in good conscience, approve the Mead and Hunt EA/EAW? Does the MAC think they are immune to the MDH and MPCA declared advisories? Where is the responsibility to the residents and the airport users?	
4/19/2018	Kate	Kopp	Email	70C	I am requesting that you acknowledge my comment and concerns regarding the MAC'S 2035 LTCP Revised Plan B. I would also request that the "No Action" option be reviewed and considered as the only viable option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations. This will accommodate all single propeller aircraft and helicopters in the 12,500 lb. classification.	See General Comment Response C(iii)
4/19/2018	T		Email	71A	I am opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	T		Email	71B	The President's report dated May 16, 1952 states that and airport is to have a clear zone of 1000 feet wide by 1/2 mile long as a safety clear zone at the end of the runway, pages 7-9. This is also enforced by the State of MN and MnDot Avionics. Clearly, the Lake Elmo runways were constructed in such a way that they encroached onto 30th St. and the railroad from its inception on the original purchased acreage. Flip the coin. When the MAC purchased or took by eminent domain, the 40 acres north of the airport and the 80 acres south of the airport, keep in mind that the road and the tracks were already there. The railroad and townships did not encroach on the airport, the airport encroached on the townships and railroad. Maybe it is time for	See General Comment Response F and G

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					the MAC and the FAA to acknowledge that this expansion doesn't make sense for the airport	
4/19/2018	T		Email	71C	Please acknowledge my comment and concerns and revert to the "No Action" option for Lake Elmo airport.	See General Comment Response C(iii)
4/19/2018	Ash	Sch	Email	72A	I am opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Ash	Sch	Email	72B	Once you remove 20+ acres of trees, you will be subjecting everyone within a one mile radius to the noise and light pollution that is generated by the airport. One of the things that makes this airport enjoyable is that you can watch the planes fly without hearing them or dodging the strobe lights (give or take the few pilots who don't follow the quiet takeoff rules.)	See General Comment Response M(ii)
4/19/2018	Ash	Sch	Email	72C	Larger, louder planes, with no natural buffers in place will change the footprint of our communities.	See General Comment Response A(i)
4/19/2018	Ash	Sch	Email	72D	We purchased our homes in a rural area to be away from the lights and noise of the city.	See General Comment Response G
4/19/2018	Ash	Sch	Email	72E	And now you want to turn Lake Elmo airport into a mini Holman field? If there was a huge need for airport space, we could be more understanding, but the numbers of pilots, students and planes are declining rapidly and nothing is rapidly leaping in to take the place of the vacated spaces, planes and pilots.	See General Comment Response J(iv)
4/19/2018	Ash	Sch	Email	72F	This expansion doesn't make sense for this airport. It only hurts our home values, natural resources, and peace of mind.	See General Comment Response G
4/19/2018	Ash	Sch	Email	72G	Please acknowledge my comment and concerns and revert to the "No Action" option for Lake Elmo airport.	See General Comment Response C(iii)
4/19/2018	Wendy	Modrynski	Email	73A	I am opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Wendy	Modrynski	Email	73B	In 1943, airports were first authorized by MN state law to enact zoning. In 1973, airport zoning was made a condition for receiving federal and state funding. Yet, this has never been done at Lake Elmo airport. If zoning had been done by 1973, we wouldn't be	See General Comment Response F(iii)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					participating in this expensive exercise again for a 50 year old outdated plan that the MAC seems to feel a need to continually resurrect at the taxpayers' expense. This airport has been noncompliant regarding zoning since its beginning. Please refer to the President's Airport Commission enacted in 1952.	
4/19/2018	Wendy	Modrynski	Email	73C	This airport is and can only continue to exist for hobbyist pilots flying single propeller driven planes and helicopters in the 12,500 lb. category.	See General Comment Response A(ii)
4/19/2018	Wendy	Modrynski	Email	73D	Please acknowledge comment and concerns regarding the MAC'S 2035 LTCP Revised Plan B. I am requesting the "NO ACTION" option be reviewed which allows restoration of the existing runways at their existing length and location.	See General Comment Response C(iii)
4/19/2018	Tamara	Larson	Email	74A	I am opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Tamara	Larson	Email	74B	The proposed expansion will disrupt 30th Street	See General Comment Response B(i)
4/19/2018	Tamara	Larson	Email	74C	[will disrupt] the land that is contaminated with TCE which will affect our wells	See General Comment Response N
4/19/2018	Tamara	Larson	Email	74D	[will affect] natural habitat, both plant and wildlife depend on that property to survive.	See General Comment Response L(i)
4/19/2018	Tamara	Larson	Email	74E	It will bring in noise	See General Comment Response D
4/19/2018	Tamara	Larson	Email	74F	and light pollution	See General Comment Response E
4/19/2018	Tamara	Larson	Email	74G	larger planes that, even with longer runways will struggle to take off and land here.	See General Comment Response A(i) and P
4/19/2018	Tamara	Larson	Email	74H	It's time to call for responsibility on the part of the MAC and the pilots who use Lake Elmo airport. For those who need longer runways, you knew the runway lengths when you chose to house and operate your aircraft here. If you're not comfortable with the amenities that Lake Elmo currently offers, you need to move before something happens to you and those of us who don't fly.	See General Comment Response C
4/19/2018	Tamara	Larson	Email	74I	We chose to live near this airport because we enjoy single engine propeller driven planes.	See General Comment Response A(ii)
4/19/2018	Tamara	Larson	Email	74J	What we don't need is this kind of disruption in our long time settled communities.	See General Comment Response G

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Tamara	Larson	Email	74K	Please acknowledge my comment and concerns regarding the MAC'S 2035 LTCP Revised Plan B. I would also request that the "No Action" option be reviewed and considered as the only viable option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations. This will accommodate all single propeller aircraft and helicopters in the 12,500 lb. classification. I would also like to request that Lake Elmo is removed from any further expansion or "enlarging" improvement plans going into the future.	See General Comment Response C(iii)
4/19/2018	Kayla?	W?	Email	75A	Opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Kayla?	W?	Email	75B	According to the EA/EAW report, Mead and Hunt has declared that 20+ acres of trees will be removed from airport and residential property to accommodate "clear" runway protection zones and the MAC has approved this action.	See General Comment Response M(i)
4/19/2018	Kayla?	W?	Email	75C	One of the most endangered species likely on the property [we won't know until they come out of hibernation in June) is the Rusty Patch Bumble Bee. They live in the trees and are known to this area.	See General Comment Response L(ii)
4/19/2018	Kayla?	W?	Email	75D	Birds that were never addressed in the EA/EAW report are the metropolitan protected Sand Crane and Trumpeter Swans. There are many species of animals that live on this property. We the people encroach on them, not the reverse. Because of the rural residential location of the Lake Elmo airport, it is important that the airport community be respectful of the protected and non-protected habitat within their perimeter. The balance between man and nature must be recognized and observed.	See General Comment Response L(i)
4/19/2018	Kayla?	W?	Email	75E	I am requesting that you acknowledge my comment and concerns and that the No Action" option be reviewed and considered as the only viable option for Lake Elmo airport.	See General Comment Response C(iii)



<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Marybeth	Carl	Email	76A	Opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Marybeth	Carl	Email	76B	Lake Elmo currently accommodates aircraft in Category I, which are small single engine propeller driven aircraft weighing 12,500 lbs. or less, and all helicopters. Holman Field, which is in the Metropolitan Airports System, is under utilized. It is located less than 20 drive miles and 15 nautical miles away from Lake Elmo Airport. Holman was not considered as a viable alternative in the Metropolitan Airports Commission LTCP 2035.	See General Comment Response C(ii)
4/19/2018	Marybeth	Carl	Email	76C	Fleming Field in SSP and Forest Lake airports also have runways in excess of 5000 feet and are within the same distance as Holman from Lake Elmo airport All of these airports have runways and facilities capable of accommodating the category II and III aircraft in the 12, 500 lb. class of aircraft that MAC would like to attract to Lake Elmo. New Richmond airport, 16 nautical miles from Lake Elmo airport in WI also has runways capable of accommodating the Category II and III aircraft in the 12, 500 lb. class of aircraft. New Richmond is very willing to accept the air traffic in the Category II and III classifications of 12,500 lbs. or less per FAA guidelines. In fact, they hosted approx. 40 personal aircraft in this category and larger during the Super Bowl event. With the opening of the St Croix River Crossing Bridge, New Richmond is looking forward to the interstate commerce that can be created and shared by both Minnesota and Wisconsin.	See General Comment Response C
4/19/2018	Marybeth	Carl	Email	76D	I am requesting that you acknowledge my comment and concerns regarding the MAC'S 2035 LTCP Revised Plan B, review and re-evaluate the chosen option, and commit to a reasonable and agreed upon solution that will benefit both the residents and pilots within the Lake Elmo community	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/19/2018	Tom	F	Email	77A	Water quality has always been an issue in the east metro. Water quality surrounding and under the Lake Elmo Airport has led to a well advisory restriction in the surrounding communities. Several homeowners have had to install water filtration systems. The Lake Elmo Airport, itself, has been designated as a Superfund site for TCE contamination. The proposed addition and construction of a new runway would definitely increase and impact surface water runoff. This water, in turn would possibly create a potential change in the groundwater absorption and groundwater saturation for the karst land surrounding the Lake Elmo Airport.	See General Comment Response N
4/19/2018	Tom	F	Email	77B	The proposed construction of a new 3500 ft. runway, 635 ft. to the east, would put the new flight pattern directly over the existing residential neighborhoods. This is a continuation of moving, shrinking, and redirecting existing safety zones. To accomplish this, it will necessitate building a new 30th street with a hairpin curve thus creating additional obstacles not presently existing. The proposed extension of the crosswind runway will lessen the degree of residential safety and shorten the protection zone for residents in Lake Elmo and Baytown. Just because a safety zone exists does not mean a failed take off or landing will end up in that zone. This proposed runway expansion and relocation is not of any benefit to the surrounding communities...	See General Comment Response F(ii)
				77C	building a new 30th street with a hairpin curve thus creating obstacles not presently existing	See General Comment Response B(i)
4/19/2018	Todd?	Mc?	Email	78A	Opposed to runway expansion at Lake Elmo Airport	Comment noted.
4/19/2018	Todd?	Mc?	Email	78B	30th Street is the boundary road between Baytown and West Lakeland Township. It is a minor contributory road that carries approximately 1700 cars per day. Residents in both townships rely on 30th St for	See General Comment Response B(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					emergency vehicle response. It is currently a 55 MPH road and it will reduce to 25-30 MPH with 2 major curves. Residents rely on 2500 gal tanker trucks to respond during a fire event, responding from as many as 5 fire stations. These townships are solely on well and septic. Transportation to and from the closest hydrant to refill trucks is crucial.	
<b>4/19/2018</b>	<b>Todd?</b>	<b>Mc?</b>	<b>Email</b>	<b>78C</b>	MAC'S Revised Plan B will re-direct 30th St to the south around a major wetland, through unstable soil. No soil borings have been done to secure the stability of the planned road.	As part of the continued design of the roadway, a geotechnical analysis will be completed to analyze the site in more detail, develop a pavement design that meets the service life and needs of the roadway, and geotechnical recommendations for the roadway subgrade. If necessary, mitigation measures will be developed during project design in accordance to MnDOT standards.  See also General Comment Response B
<b>4/19/2018</b>	<b>Todd?</b>	<b>Mc?</b>	<b>Email</b>	<b>78D</b>	I am requesting that you acknowledge my comment and concerns regarding the MAC'S 2035 LTCP Revised Plan B, review and re-evaluate the chosen option, and commit to a reasonable and agreed upon solution that will benefit both the residents and pilots within the Lake Elmo airport communities.	Comment noted.
<b>4/19/2018</b>	<b>Patrick</b>	<b>Fleming</b>	<b>Email</b>	<b>79A</b>	I live in Lake Elmo and I fly out of Lake Elmo Airport. These comments are to augment oral comments I made at the public meeting on 4 April 2018. I live 9 minutes from the 21D. Any other airport is at least a 50 minute round trip by the time I get inside and to a hanger location. This is the only airport in Washington county and we need to preserve it.	See General Comment Response C(v)
<b>4/19/2018</b>	<b>Patrick</b>	<b>Fleming</b>	<b>Email</b>	<b>79B</b>	I fly a Cherokee Six and I fly almost exclusively for personal travel and the training needed to maintain my proficiency. When I am traveling with my family, I operate the airplane very near its maximum weight. I will not land at a	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					destination airport with less than a 3000 foot runway, and I prefer 3500 feet. This puts Lake Elmo below my personal minimums for travel. I usually make an exception for my home base airport because I know the area well, but I do have a contingency plan to have my family drive to another airport where I will pick them up if conditions (temperature and wind) do not allow for a safe departure from 21D.	
4/19/2018	Patrick	Fleming	Email	79C	I have a idea of the logic of why the airport needs to have a runway extension that I have not heard stated and it is this. 1) It is not feasible to close the airport because the MAC has accepted federal funds for improvements in the past and therefore are obligated to keep the airport open. 2) The runway pavement needs to be replaced and federal funds (that come from aviation fuel taxes) are available to pay for the re-paving of the runway. 3) However, in order to get those federal funds, the airport has to be "brought up to code". There is currently a road in the runway exclusion zone and the runway is too short to effectively serve the needs of the equipment it is designed to serve. Therefore, the runway needs to be moved and extended in the repaving process.	This comment is not accurate. The project is being proposed for the reasons stated in Chapter 2, <i>Purpose and Need</i> , and for no other reason.
4/19/2018	Patrick	Fleming	Email	79D	The MAC is also doing Washington County a favor. The county has plans to upgrade and modify Manning avenue. If the runway is not moved, the county will have to put a new curve in the road to avoid the current runway exclusion zone. This will require land acquisition and an additional curve in a heavily traveled road.	See response to comment 48D
4/19/2018	Patrick	Fleming	Email	79E	I support the runway repaving and extension and hope the project goes well	Comment noted.
4/19/2018	Mary	Vierling	Email	80A	Opposed to any runway expansion/improvements at Lake Elmo Airport	Comment noted.



<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Mary	Vierling	Email	80B	First and foremost, 30th Street cannot change from its current configuration. It is way too dangerous to add a curve in inclement weather and it deters from response time for emergency vehicles.	See General Comment Response B(i)
4/19/2018	Mary	Vierling	Email	80C	Table 4-1 on page 4-5 had some very interesting numbers. How did you ever come up with those operation numbers at Lake Elmo? 14,561 military operations? Not a chance of military operations in numbers that great. Air taxi 1,147? General aviation 10,790? Even the reported number of based number of aircraft (209) is incorrect. The correct number per the FAA in February of 2018 is: Single engine: 172, Multi engine: 4, Rotorcraft: 1, Total: 177.	See General Comment Responses O(i) and O(ii)
4/19/2018	Mary	Vierling	Email	80D	Per the article on Twin Cities.com, "Now, according to the new FAA mandate, a plane must fly less than 3,000 feet above Holman field's space and a control tower must make contact in order for the plane to be included in St. Paul's operation numbers." Are you doing the same method of counting at Lake Elmo? Anything that flew through the airspace based on radar was counted as an operation? The paper also stated that touch and goes can no longer be counted as an operation, which brings me to: From the LTCP 2035: "On Saturday, August 29, 2015, a group of citizens counted aircraft operations at Lake Elmo Airport from 7:00am until 10:00pm. According to one commenter, over the course of the day, the citizens reported observing 54 aircraft movements, of which 37 were touch-and-go's. Per industry criteria, each touch-and-go counts as two aircraft operations (a takeoff and a landing). This equates to 74 daily operations associated with touch-and-go's. When combined with the number of itinerant (non touch-and-go) operations observed, the total traffic count for the day is approximately 91. This number correlates very well to the	See General Comment Response O(i)  After further review of available MACNOMS flight track data, MAC acknowledges that the community group's counts for August 29, 2015 are likely representative of the total operations at Lake Elmo Airport for that day. According to the flight track data, August 29, 2015 was not a particularly busy flying day at Lake Elmo Airport. There were 22 days in August 2015 with higher levels of aircraft activity than August 29, including 10 days with over 100 flight operations tracked.  This review does not change the findings of the flight operations estimates or the aircraft noise analysis in the Draft EA/EAW.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					<p>summertime on-site observations that formed the basis for the activity forecast.” Reality: August 29, 2015, our neighborhood did an actual count of operations at the airport. Our total was 57, of which 34 were touch and goes. Someone at Mead &amp; Hunt or MAC decided that we counted the touch and goes as one operation instead of two and changed the total number of operations to 91 for the purpose of the operation count in the LTCP report without consulting any of us.</p>	
4/19/2018	Mary	Vierling	Email	80E	<p>Extending the 14/32 runway to 3500’ and 04/32 to 2750’ still does not safely meet the need of the category II and III aircraft in the 12,500 lb. classification in the event of aborting a takeoff or overrun landing per chart 2.1 in the EA/EAW report. 3600’ of runway does not encompass these aircraft at 100% either. It leaves Lake Elmo in the same position it seems to be in today, pilots flying planes into an airport that barely meets its takeoff and landing needs. Many of the aircraft landing at Lake Elmo for various events should absolutely not be there, which directly affects the safety of those of us on the ground whether on airport property or not. If the larger planes, per MAC, can more easily land on the crosswind runway at 2750’, then why are we extending runways? What is currently there should be totally sufficient on 14/32 and feel free to extend 04/32 to 2750’.</p>	See General Comment Response P
4/19/2018	Mary	Vierling	Email	80F	<p>Section 4-4 Land Uses and Zoning * Places of Assembly: The Washington County Fairgrounds are located one mile north of the Airport in Baytown Township. None of these places of public assembly is within the approach and departure areas at the Airport.* This is incorrect. The Fairgrounds are located directly across the road from airport property and is directly north of the 14/32 runway. In addition to hosting the Washington County Fair every year, many</p>	<p>As shown in Figure 3-10, the fairgrounds are not within the State Model Safety Zones A and B. The fairgrounds are thus not within the approach and departure areas of the Airport where assembly of people would be restricted under the State Model Airport Zoning Ordinance. An airport zoning ordinance will be developed as described in Section 4.4.5 of the Draft EA/EAW.</p>

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					other entities rent the facility all year for flea market sales, kids and clothing sales, baseball and soccer events, horse shows, dog shows, etc., attracting hundreds, sometimes thousands of people.	
<b>4/19/2018</b>	<b>Mary</b>	<b>Vierling</b>	<b>Email</b>	<b>80G</b>	*The nearest parks/recreational areas are Reid Park and Lake Elmo Park Reserve. Reid Park is a 30-acre community park equipped with a playground and several fields for sporting events such as soccer, football, and softball. Neither of these parks is in the approach or departure areas at the Airport.* This is incorrect. Reid Park is located less than 1 mile west of runway 04/32 where takeoff and landing occurs directly over the park.	Although Reid Park is located below the Airport's VFR traffic pattern, straight-in approaches to Runway 04 and straight-out departures from Runway 22 do not overfly the park. Therefore, while there are overflights of Reid Park, they do not occur during the final approach or initial take off phases of operations associated with the Airport.
<b>4/19/2018</b>	<b>Mary</b>	<b>Vierling</b>	<b>Email</b>	<b>80H</b>	Mead & Hunt and the MAC have failed to note that the Lake Elmo airport property is included in a super-fund clean up for TCE contamination since the 1990's.	See General Comment Response N
<b>4/19/2018</b>	<b>Mary</b>	<b>Vierling</b>	<b>Email</b>	<b>80I</b>	Zoning has been required at Lake Elmo since 1977. MAC has failed to comply at the request of the Met Council and MnDot to assemble a joint zoning board for the purpose of zoning for the Lake Elmo airport. If zoning had been in place, perhaps we wouldn't be in this situation today. To proceed with this expansion / improvement at this point in time, with the MAC promising once again to form a joint zoning board to assist in putting zoning in place after the expansion, it seems that MAC would be asking forgiveness instead of permission to the parties involved. Maybe better said, this expansion puts the cart ahead of the horse in a BIG way. This is not right and should not be allowed. In my opinion, the MAC considers themselves privy to and above regulations that restrict other airports in Minnesota.	See General Comment Response F(iii)
<b>4/19/2018</b>	<b>Mary</b>	<b>Vierling</b>	<b>Email</b>	<b>80J</b>	ADS-B transponders are required in all aircraft per the FAA in the 7 county metro areas by 2020. It is a requirement for all	See General Comment Response J(iv)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					aircraft by 2025. This will likely cause a large number of pilots currently using Lake Elmo to retire from flying or move to an airport outside the 7 county metro area, giving yet another reason to not disrupt the thousands of people currently residing in the 2 mile area surrounding the airport.	
<b>4/19/2018</b>	<b>Mary</b>	<b>Vierling</b>	<b>Email</b>	<b>80K</b>	30th Street was recently upgraded to a major contributing artery road in Washington County.	Both the 2030 Washington County Comprehensive Plan and the Draft 2040 Washington County Comprehensive Plan classify 30th Street North as a major collector road. This is also consistent with the Functional Classification System prepared by the Metropolitan Council. The Draft EA/EAW accurately identifies this road as a major collector road throughout the document. On page 5-13, the Draft EA/EAW states: "The 30th Street North roadway east of Manning Avenue North is classified as a major collector based on the Functional Classification System prepared by the Metropolitan Council in September 2014. This classification was used to determine appropriate dimensions, curvature, speed limits, and design for the realigned roadway."
<b>4/19/2018</b>	<b>Mary</b>	<b>Vierling</b>	<b>Email</b>	<b>80L</b>	The MAC decided solely on this plan and has absolutely refused to acknowledge that the airport over time has become land-locked.	See General Comment Response F(iv)
<b>4/19/2018</b>	<b>Mary</b>	<b>Vierling</b>	<b>Email</b>	<b>80M</b>	The 1965 dream of expanding runways in excess of 3000 feet are past. MAC should have purchased the property needed to support an expansion of this size long ago.	See General Comment Response H
<b>4/19/2018</b>	<b>Mary</b>	<b>Vierling</b>	<b>Email</b>	<b>80N</b>	Because there is not a user-based justification for expansion, the MAC should not be frivolously spending millions of our federal taxpayer dollars on expansions. We respectfully and wholeheartedly disagree with your purpose and need for Lake Elmo airport. It is simply not supported.	See General Comment Response J(i)
<b>4/19/2018</b>	<b>Michael</b>	<b>Seeber</b>	<b>Email</b>	<b>81A</b>	I live close by the airport. I have been to most of the public meetings. I have found MAC laughably dishonest. Last week in the	See General Comment Response I(iii), O(i), and R



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					public comment meeting they stated this is not an expansion but have previously called it an expansion. At a previous meeting they stated the environmental study is not really an environmental study. They have made wildly exaggerated claims about the number of flights and when questioned say they really don't keep track. Also, one plane can touch wheels down and go right back up many times and each time they count that as another plane. They have denied publicly that taxpayer money is being used, while taking money from the public and federal likewise.	
4/19/2018	Michael	Seeber	Email	81B	The project is grossly wasteful, doesn't pass the smell test and is unnecessary.	See General Comment Response J(i)
4/19/2018	Michael	Seeber	Email	81C	The public meetings give the appearance of due process without any substance. They claim they have made concessions but have never given an inch to our one and only point which is keeping the runway at its current length. They claim to listen but don't and push their agenda by force.	See General Comment Response I(i)
4/19/2018	Michael	Seeber	Email	81D	Mike Madigan stated in a public meeting last summer in Baytown that the current runway is too short and unsafe and later denied saying it. If true, the airport needs to be shut down now. If false, he misspoke, doesn't know or remember what he said or is untruthful. Either way, his argument fails. FACT: For the last 50 years every single pilot, for every single flight, has deemed the runway long enough and safe enough to utilize it. No lengthening is needed for safety.	As noted in Section 2.1 of the Draft EA/EAW, one of the three general infrastructure goals for the proposed action is to enhance safety for Airport users and neighbors. The proposed action has been designed with this goal top of mind.  See also General Comment Response P
4/19/2018	Michael	Seeber	Email	81E	Their "compromise" plan for 30th street is a joke with the wild curve, it is not safe. Fire department opposes it. Our people oppose it. Our town boards will not approve it; it is against our wishes and against common sense. Also, 30th street is now a major arterial road. It simply doesn't work.	See General Comment Response B(i)

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Michael	Seeber	Email	81F	In addition in around 1990 there was TCE pollution in the area and it was deemed a superfund site I think. Several monitoring wells set up around the airport. Why didn't the "environmental study" contain this information. Any construction digging up dirt will stir up contamination and will probably not even be allowed by federal and state authorities.	See General Comment Response N
4/19/2018	Michael	Seeber	Email	81G	A better use of this "free" money will be the New Richmond airport which needs and wants the growth and is better situated.	See General Comment Response C(i)
4/19/2018	Michael	Seeber	Email	81H	It is most important to understand that the bottom line for pushing this project is that MAC must lengthen the runway to qualify for federal funding to pay for the repaving.	See General Comment Response J(ii)
4/19/2018	Ann	Bucheck	Email	82A	There is no zoning in place which has been required at all reliever airports since 1976. Why have you not obtained zoning? What zoning do you intend to have? Homes have been built extremely close with large holding ponds due to the water runoff. Lack of zoning is lack of protection to residents and pilots. If you do not have guaranteed zoning why has your agency proceeded with this project? What have you requested and what have you received?	See General Comment Response F(iii)
4/19/2018	Madeleine	Fleming	Email	83A	Lake Elmo Airport saved my life. Twenty-plus years ago, while learning to fly with Alpha Aviation in South St. Paul, I departed on a solo flight from Fleming Field's single runway. The crosswind that day was stronger than any I'd experienced as a student pilot. I managed to get above the terrain without incident, but I realized that landing was going to be a much bigger challenge. When I returned to the airport, I made several attempts to land, but eventually realized I probably wouldn't make it down safely onto that runway. The downtown St. Paul airport was closed due to flooding, eliminating my first choice of an alternate, so I flew over to Lake	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					Elmo. There, where one of the two runways was aligned to the wind, I was able to land the plane safely without the crosswind. The next day, with the winds mostly unchanged, my instructor taught me how to land with a crosswind. He agreed that it was inconvenient for Alpha to get to Lake Elmo to retrieve me and the plane, but that choosing Lake Elmo was the right thing to do in the situation. I was glad it was there. I hope it will stay.	
4/19/2018	Ann	Bueck	Email	84A	I attended the hearing on the proposed Lake Elmo Airport expansion at Oakland Middle School, Lake Elmo on April 4, 2018. I read a statement at the meeting and left my statement and questions with the recorder. At the meeting a representative from the New Richmond, Wisconsin, airport spoke. He stated their airport was larger than the Lake Elmo Airport and could accommodate additional planes and flights. Although this airport is in an adjoining state, why isn't the FAA and your organization working with them to plan for the future? They seem eager to expand, and you must admit you have received opposition regarding your proposal. There have no opposition and are ready to expand, ready for more business. Why not work with our neighbors to the east?	See General Comment Response C(i)
4/19/2018	Ann	Bueck	Email	84B	I continue to feel this airport expansion is incorrect for a number of reasons	Comment noted.
4/19/2018	Molly	Olson	Email	85A	THE LAKE ELMO AIRPORT EXPANSION by M.A.C. IN MINNESOTA SHOULD NOT BE APPROVED BY THE F.A.A. The community is PLEADING with the F.A.A. that you listen to the community and come out here and see for yourself WHY this expansion is problematic and will destroy our community, and why there is NO NEED and how they Minnesota Metropolitan Airport Commission (M.A.C.) has not been honest about how this micro recreational airport is being used. The state M.A.C. has pretended	See General Comment Response I(i)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					to listen to the concerns of the community, but they have instead spent most of their time TELLING us what they are going to do anyway – regardless. They claim to have made 2 changes in their plan to pacify the community, but neither change solves the concerns. Their changes are only window dressing so they can say some changes were made.	
4/19/2018	Molly	Olson	Email	85B	THE MINNESOTA STATE M.A.C. IS BASING Its ENTIRE PLAN ON A MAP OF THE AREA FROM ABOUT 50 YEARS AGO WHEN THIS WAS A VERY DIFFERENT COMMUNITY. THE ENVIRONMENTAL ASSESSMENT CONSISTENTLY MINIMIZED THE IMPACT ON PEOPLE.	See General Comment Response H
4/19/2018	Molly	Olson	Email	85C	Now the state has discovered massive water contamination in the area – M.A.C.’s “hired gun” who did the Environmental Assessment has continued to ignore the impact or potential impact on the water issue. The water contamination has recently been escalated with the closing of wells in the area, dramatic clean up issues, and a lawsuit decision against those blamed for the contamination (i.e. the 3M corporation).	See General Comment Response N
4/19/2018	Molly	Olson	Email	85D	Now the number of houses and developments that have been developed over the last 50 years is dramatically higher and even more concentrated around the airport. This has occurred over the last 5 years, but many in the last 2 years. Homes/citizens are an afterthought and an annoyance to M.A.C. The homes/citizens are greatly impacted, it is highly relevant, and has been continually dismissed by M.A.C.	See General Comment Response F(iv)
4/19/2018	Molly	Olson	Email	85E	The main (one and only) road going east-west would need to be re-routed. Their re-route plan is not only a safety hazard – but just LOOK at their map of the road – how can ANYONE in their right mind say that is O.K. and safe? It defies common sense. The main (one and only) road going north-south is	See General Comment Response B(i)



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					beginning an expansion plan, and this was ignored or minimized by M.A.C "hired gun.	
4/19/2018	Molly	Olson	Email	85F	THERE IS NO LEGITIMATE PUBLIC PURPOSE OR NEED FOR THIS COMMUNITY OR THE STATE AND THIS UNWARRANTED EXPENDITURE (aka EXPANSION OF THE RUNWAY LENGTH AND OTHER SO-CALLED IMPROVEMENTS THEY "WANT" TO MAKE ONLY TO GET THE FEDERAL MONEY.) THE AIRPORT MAY NEED RESURFACING, BUT THERE IS NOTHING ELSE NEEDED.	See General Comment Response J(i)
4/19/2018	Molly	Olson	Email	85G	M.A.C. has COMPLETELY MISREPRESENTED THE ACTUAL FLIGHTS PER DAY AT THIS AIRPORT. The community has A LOT of evidence of the "fake" numbers that M.A.C. has provided to the F.A.A. in their report.	See General Comment Response O(i)
4/19/2018	Molly	Olson	Email	85H	THE EXPANSION IS A MONEY GRAB FOR FEDERAL MONEY THAT IS UNWARRANTED.	See General Comment Response J(ii)
4/19/2018	Molly	Olson	Email	85I	THERE IS A MUCH LARGER BIGGER AND BETTER AIRPORT 15 MINUTES AWAY (into a popular Wisconsin area and they WANT more traffic we do not want) THAT CAN SERVE THE NEEDS OF LARGER AIRCRAFT.	See General Comment Response C(i)
4/19/2018	Molly	Olson	Email	85J	THIS Lake Elmo Airport, HIGHLY UNDERUTILIZED AND CONTINUALLY DYING AIRPORT, IS ONLY USED MOSTLY FOR SMALL A 2-4 SEATER HOBBYISTS, AND A SMALL PRIVATE PILOT SCHOOL. It is public money being used for purely private purpose.	See General Comment Response J(iii)
4/19/2018	Molly	Olson	Email	85K	THE STATE COULD REPAIR THE EXISTING RUNWAY, KEEPING THE ROAD AND THE RUNWAY LENGTH AS IS, WITH THEIR OWN STATE FUNDS (NOT FEDERAL FUNDS) AND THE COMMUNITY WOULD BE PERFECTLY HAPPY. THE COMMUNITY IS NOT AGAINST THEIR AIRPORT, THEY ARE AGAINST THE	See General Comment Response C(iii)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					UNWARRANTED EXPANSION of this airport.	
4/19/2018	Molly	Olson	Email	85L	The employees of Minnesota M.A.C. have tried to give the community surrounding the (false) impression that they care about what the community thinks and KNOWS (first hand) about the airport and the impact an expansion would have on the entire community. From the beginning their efforts to get community involvement have only been to "tell" us what "they" are "doing." It has NOT been a collaborative approach with the community. The community is only being addressed because there is SO much opposition, they can't ignore it. Consistently throughout the process of "telling" the community what they were doing, NO WHERE in their stated "purpose and need," did the any actual public purpose for this.	See General Comment Response I(i)
4/19/2018	Molly	Olson	Email	85M	Please stop this expansion	Comment noted.
4/19/2018	Hans	Spitzer	Email	86A	Opposed to the current plans for runway expansion at the Lake Elmo Airport	Comment noted.
4/19/2018	Hans	Spitzer	Email	86B	The Lake Elmo airport doesn't have enough actual operations, or enough use, to be able to pay for repaving of the current runway as it is. The vast majority of the money that the airport will need will be coming from the FAA and federal tax dollars, since it doesn't have the money for such a project. In order to qualify for federal funding, the airport will have to extend its runway. This suggests financial mismanagement, and/or extreme lack of use.	See General Comment Response J(ii) and R
4/19/2018	Hans	Spitzer	Email	86C	The Lake Elmo airport is currently getting a waiver so it won't have to extend the runway to full FAA regulations. Over the decades, use of the Lake Elmo Airport has decreased and Federal aviation regulations have increased.	The Lake Elmo Airport does not have a waiver related to any FAA standards.
4/19/2018	Hans	Spitzer	Email	86D	The management of the Lake Elmo airport, and MAC, are using part of an outdated expansion plan	See General Comment Response H

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Hans	Spitzer	Email	86E	Plan does not accommodate the residential communities that have grown around it over the decades.	See General Comment Response F(iv)
4/19/2018	Hans	Spitzer	Email	86F	The MAC, and the Lake Elmo airport management consequently, are non-elected bureaucratic officials whose decisions will negatively impact the lives of citizens that live around the airport.	See General Comment Response I(ii)
4/19/2018	Hans	Spitzer	Email	86G	Their quality of life and property values will decline because of this expansion.	See General Comment Response K
4/19/2018	Hans	Spitzer	Email	86H	If this was a governmental eminent domain issue, based off of a "good of the community", then it could be approached in a different fashion. But, non-elected bureaucratic officials are trying to fundamentally affect the lives of tax paying citizens.	See General Comment Response I(ii)
4/19/2018	Hans	Spitzer	Email	86I	The Lake Elmo airport management is trying to ram through this bad plan to avoid zoning requirements that have been required at reliever airports since 1976.	See General Comment Response F(iii)
4/19/2018	Hans	Spitzer	Email	86J	I would formally request that the FAA not fund this project, and that the federal funding go to larger airports like Holman field or the New Richmond, WI airport.	See General Comment Response C(i)
4/19/2018	Hans	Spitzer	Email	86K	The Lake Elmo airport should be able to maintain its current runways through its own accounts, and the revenue that it receives from the pilots that utilize that airport.	See General Comment Response C(iii)

Attachment  
Late-Filed Comments on the EA/EAW and Responses

This attachment contains copies of correspondence received after the close of the public comment period for the Draft EA/EAW on April 19, 2018 at 5:00 P.M. These e-mails and letters are identified as late-filed comments. While not legally or otherwise obligated to respond to the content of these letters, the MAC has chosen to respond to this correspondence in the interest of full disclosure.





<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Robert	Lupelow	Email	87A	As a pilot flying at 21D for 38 years and airplane and hangar owner for 25 years, I believe the planned runway extension and realignment is a long overdue safety enhancement.	Comment noted.
4/19/2018	Robert	Lupelow	Email	87B	21D is as it has been for many years prior to my business and personal flights a viable and necessary location.	Comment noted.
4/19/2018	Robert	Lupelow	Email	87C	As to others opinions per Krnh being a reasonable replacement, I strongly disagree. I would probably relocate to Kane instead.	See General Comment Response C
4/19/2018	Marian	Appelt	Email	88A	The EA/EAW presented a thorough look at the impact of the expansion plan however I do not agree with all the conclusions, especially regarding the impact on the surrounding communities. The EA/EAW states the impact is not substantial. I disagree with this.	See General Comment Response T
4/19/2018	Marian	Appelt	Email	88B	The 30th Street realignment continues to be a major concern. The traffic on 30th Street I believe was underestimated. It is a major east-west road. The curves in the road and the change in the elevation through the area the road is planned will present problems.	See General Comment Response B
4/19/2018	Marian	Appelt	Email	88C	Regarding the removal of the trees, the plan provides mitigation plans for the removal of the trees by a number of actions (light baffles, solid fencing, and installation of different intensity lights) but it is not clear how these plans will be monitored to assure these actions are actually completed. These trees and some of the trees on private property are oak trees of substantial years. Especially for the trees on the private properties this is a substantial impact.	See General Comment Responses E & M
4/19/2018	Marian	Appelt	Email	88D	The shift of the runway 610 feet to the east will put the flight path more directly over the homes along Neal Avenue. This has an impact on these homes especially regarding the sound.	See General Comment Response D
4/19/2018	Marian	Appelt	Email	88E	My biggest concern with the MAC 2015 plan for Lake Elmo is that I do not believe there is a need for the airport expansion.	See General Comment Response J

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/19/2018	Marian	Appelt	Email	88F	The projections of the number of operations and the number of planes at the airport between the 2008 & 2015 plan shows the airport use to be flat or declining which means there is a decreased interest in recreational flying and does not support airport expansion.	See General Comment Response J(iv)
4/19/2018	Marian	Appelt	Email	88G	The regional airports are all underutilized as stated in a recent article in the Pioneer Press so expansion does not seem prudent	See General Comment Response C
4/19/2018	Marian	Appelt	Email	88H	Other airports can accommodate the larger planes which need the longer runways	See General Comment Response C
4/19/2018	Marian	Appelt	Email	88I	New Richmond airport may not be within the MAC system but I would think the FAA would want to look at the region and not just at MAC airports before spending the funds at Lake Elmo	See General Comment Response C(i)
4/19/2018	Marian	Appelt	Email	88J	Expansion of the airport with all the residential development projects planned for Lake Elmo is not a good fit. MAC needs to consider that the area around the airport may no longer supports the airport expansion. The airport has been a good neighbor and the community enjoys the airport, as it is. Unfortunately the community grew up around the airport and some of this growth was imposed by the Met Council. Longer runways and larger planes are not consistent with the area now.	See General Comment Response G
4/19/2018	Marian	Appelt	Email	88K	I acknowledge the effort by MAC to adjust the original preferred plan to address the 30th Street concern of neighbors, however I do not believe the 100 foot reduction in length and the new 30th Street plan was enough of a compromise. MAC also created the CEP however the results did not seem to build the trust between the community and MAC as hoped. The community still has the impression MAC was creating this group to appease the community with no intent to really listen. I do have difficulty understanding how this project continues to be moved forward when all the surrounding	See General Comment Response I

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					municipalities have voiced their objections to this plan and the state officials representing the community have spoken against the plan.	
4/19/2018	Marian	Appelt	Email	88L	A number of disrespectful comments were addressed to the community members by the Commissioners and MAC personnel. This does not build good relationships.	See General Comment Response I
4/19/2018	Marian	Appelt	Email	88M	I do understand that in order to obtain the federal funds for the project MAC would need to bring the runway up to the newer standards regarding safety zones etc. It has also been pointed out to me that major work like this is always done with federal dollars.	See General Comment Response J(ii)
4/19/2018	Marian	Appelt	Email	88N	Perhaps it is time to figure out alternative funding options for fixing the current runways without the added expense of building the longer ones and to invest the federal dollars in other areas i.e. a cross winds runway for the New Richmond airport.	See General Comment Response C(i)
4/19/2018	Marian	Appelt	Email	88O	Met Council approved the Lake Elmo Comprehensive plan which states it does not support the airport expansion yet the Met Council also approved the MAC for the expansion. Perhaps there needs to be some oversight on these two bodies which does not exist today.	As noted in Met Council's 2015 System Statement for the City of Lake Elmo, "Lake Elmo is within the influence area of Lake Elmo Airport" and "Communities influenced by this airport should review the LTCP to assure that the updated comprehensive plan developed by the community remains consistent with the airport plans." The MAC understands that the City of Lake Elmo is currently in the process of updating its comprehensive plan and published a draft version on June 14, 2018, which considers the LTCP as recommended by Met Council. The draft version states that "the preferred alternative for Lake Elmo Airport does not change its impact on the City of Lake Elmo" and does not express opposition to the proposed action at the Airport.
4/20/2018	John	Krack	Email	89A	fully support MAC's recommendation to relocate and extend runway 14/32 at the Lake Elmo airport	Comment noted.
4/20/2018	John	Krack	Email	89B	Some speakers at the public hearing were concerned that MAC doesn't listen to	Comment noted.



Date	First Name	Last Name	Source	Comment ID	Comment	Response
					community members. However, listening means thoughtfully considering input and trying to accommodate it, but not necessarily fully acquiescing to desires. MAC has been open and willing to listen to community concerns, and has attempted to address them.	
4/20/2018	John	Krack	Email	89C	Looking at the graphic MAC published in one of its handouts, the longer runway will certainly make the airport more accessible to some aircraft at the higher end of the design class, but it's questionable how many of such aircraft would use the airport on a regular basis, particularly, as some pointed out at the hearing, there are two nearby airports (STP and New Richmond) with much better facilities (longer runways and better approach facilities) to accommodate the larger aircraft, particularly in less than ideal weather conditions. For several of these aircraft (Beech Baron 58, King Air 200, Socata TBM 700) a 3500' runway appears to be a bit marginal, and it's unlikely that an operator would want to base at an airport that might be marginal under not infrequent weather conditions (no headwind, hot day, wet or snowy runway, etc.).	See General Comment Response A(i)
4/20/2018	John	Krack	Email	89D	It's also questionable whether a larger departing aircraft would bring appreciably more noise by the time it crossed the airport boundary. That could certainly be explored as part of the environmental review. However, the noise contours depicted in the draft EAW show the 60DNL level (well below the FAA's standard of 65) entirely on airport property, indicating that noise should not be a significant impact.	See General Comment Response D
4/20/2018	John	Krack	Email	89E	What the longer runway WOULD do is make operations safer for virtually all aircraft that use the airport. A malfunction on takeoff or a misjudgment on landing would give the pilot significantly more room to safely recover,	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					benefitting both the pilot and nearby residents.	
4/20/2018	John	Krack	Email	89F	Finally, MAC is updating noise abatement plans for all reliever airports, and is making a greater effort to communicate these plans to the aviation community. Most of the pilots I know want to be good neighbors and, consistent with safety, will operate to minimize noise impacts on surrounding communities if they are made aware of what the guidelines are. Moreover, MAC has a noise department that follows up on all complaints, and will work with operators to address any problems.	See General Comment Response D
4/20/2018	John	Krack	Email	89G	Rerouting the road would add approximately 46 seconds to driving times, which would be a minor inconvenience and would not affect emergency services significantly. The reroute would keep the roadway completely out of the RPZ, a safety factor for both motorists and pilots.	Comment noted.
4/20/2018	John	Krack	Email	89H	One thought: if the proposed design is considered to pose a throughput problem, consider widening the eastbound section of the curve to two lanes, thus doubling the capacity to account for the lower speed limit. (Making the westbound curve two lanes would create a bottleneck where it dropped back to one lane, so probably wouldn't help much.)	See General Comment Response B(ii)
4/20/2018	John	Krack	Email	89I	That runway 14/32 needs replaced is a given. Doing it in place does not address the incursion of Manning Avenue in the RPZ, which could result in rerouting Manning should it be widened in the future. Moving the runway addresses that, with little other impact, and no future cost, to the community.	Comment noted.
4/20/2018	John	Krack	Email	89J	Modern aircraft are higher performance and need longer runways to operate safely. And any aircraft gets an extra margin of safety from a longer runway. From a pure safety standpoint, it makes sense to extend the runway, especially as more infrastructure is	Comment noted.

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					built around the airport. 2800 foot runways are largely obsolete. 3500 foot runways are more the norm, and conform to the FAA's guideline for the design class.	
4/20/2018	John	Krack	Email	89K	Extending the runway makes the airport more usable to aircraft at the higher end of the design class, particularly cabin class twins which small businesses would tend to use, and to existing aircraft users at heavier loads and in adverse weather conditions. This enhances economic benefit by potentially attracting small businesses to the local area because of a convenient airport, and transients who stay in area hotels, rent cars, and patronize restaurants and entertainment.	Comment noted.
4/20/2018	John	Krack	Email	89L	Significantly larger aircraft would likely go elsewhere, as a 3500 foot runway would be marginal for them.	Comment noted.
4/20/2018	John	Krack	Email	89M	MAC's legislative charter is to manage its airports to optimize safety and utility. This plan is a significant step forward on both these fronts	Comment noted.
4/20/2018	John	Krack	Email	89N	Finally, MAC has led a very thorough, open, and transparent process to get to this point. They've met with stakeholders, engaged community leaders, and modified the plan several times to accommodate community concerns. There's very little else that can be done under existing constraints of money and land. The LTCP has been approved by the Met Council and the FAA, so it fits in with these agencies' plans and guidelines. This isn't a "MAC only" project.	Comment noted.
4/21/2018	Mark	Werner	Email	90A	I want to add my support for the airport expansion	Comment noted.
4/21/2018	Mark	Werner	Email	90B	I believe 30th should be designed per alternative 1? Reasons being the following: 1. 80% of the traffic on 30th is coming and going south on Neal. Majority of traffic is from neighborhoods south of the airport going to Manning via 30th. 2. In the future fire and police protection will come from Lake	Alternative 1 was the original preferred alternative for realigning 30 <sup>th</sup> Street in the Draft LTCP. During the stakeholder outreach process for the LTCP, the community expressed a preference for maintaining the existing four-way intersection of 30 <sup>th</sup> Street North and Neal

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
					Elmo. Lake Elmo will change dramatically with the change to high density housing and connection to the Metro sewer system. 3. Adding a curve back to the existing intersection of Neal and 30th decreases safety and increases winter driving hazards.	Avenue North. For this reason, the preferred alternative was modified to reflect Alternative 3 prior to publication of the Final LTCP. More information about the studies done regarding the 30 <sup>th</sup> Street realignment can be found in Chapter 2 and Appendix B of the EA/EAW.
4/23/2018	Denise	Cornell	Mail	91A	I am writing in response to the Lake Elmo Airport Expansion in which I am totally against and to the re-routing of 30 <sup>th</sup> Street due to the airport wanting to lengthen the runways at the airport.	Comment noted
4/23/2018	Denise	Cornell	Mail	91B	We are one of the homes with the expansion that will be located in Zone A. We are concern about our home value loss and the concern about the future of selling our home.	See General Comment Response S
4/23/2018	Denise	Cornell	Mail	91C	We will be about 700 feet closer to the end of the runway. How will the increase of noise and runway lights that will be aimed at my house be block since many of the trees that block it today will be cut down?	See General Comment Response M(ii)
4/23/2018	Denise	Cornell	Mail	91D	We have many deer, coyotes, fox, many types of birds and other small animals that may need to relocate because their habitat has changed they need to be protected to.	See General Comment Response L(i)
4/23/2018	Denise	Cornell	Mail	91E	We have concerns about the potential of water runoffs from those runways that could potentially put chemicals in our wells. We are very concern about our drinking water most residents in and around the airport are already having their wells tested every couple of years because we are in a well advisory area due to (TCE). What kind of guarantee do we have that by disrupting the land around our homes these contaminates that are already in the area may flow into our wells that have been so far free of TCE? Also since chemicals such as deicing, fuels & other cleaners are used at the airport now & with the potential of having larger airplanes at this airport how are we guarantee over the years these chemicals will not flow into our wells?	See General Comment Response N

<b>Date</b>	<b>First Name</b>	<b>Last Name</b>	<b>Source</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Response</b>
4/23/2018	Denise	Cornell	Mail	91F	We built 31 years ago understanding that the airport was here and that the acreage around our home was yet not developed. Back then I could ride my horses on Neal Avenue & 30 <sup>th</sup> Street as this was my hobby, however, over the years the land was develop, more cars drove down our street and it was no longer safe for me to ride on the street so I had to make a change and find alternatives if I wanted to continue my hobby. I did not go to the township and request that they change roads, or stop developing because of my hobby. I don't have a problem with pilots wanting to enjoy their hobby of flying airplanes however I do not believe that I should have to subsidize their hobby or one's flying business.	See General Comment Response J(iii)
4/23/2018	Denise	Cornell	Mail	91G	If they don't feel safe landing their airplane at Lake Elmo Airport there are other airports within 20 miles.	See General Comment Response C
4/23/2018	Denise	Cornell	Mail	91H	I especially feel that government funds going towards this project only to benefit a few pilots at the cost of many taxpayers does not warrant this expansion particularly when there is an airport that is 30 some minutes away. At the Public Hearing on April 4 about the airport a representative from the Chambers of Commerce of New Richmond stood before MAC representatives and stated that their airport could handle the request made by pilots for a larger runway.	See General Comment Response C(i)
4/23/2018	Brad	Cornell	Mail	92A	I am writing in response to the Lake Elmo Airport Expansion in which I am totally against and to the re-routing of a local high traffic road 30 <sup>th</sup> Street on the south side of the airport due to MAC wanting to implement a 1965 long term plan to lengthen runway 14/32 in which the airport would have the potential of bringing larger aircraft & the flight path closer to our home.	See General Comment Response A(i)
4/23/2018	Brad	Cornell	Mail	92B	This airport has been perceived and used as a recreational airport for the past 31 years that we have lived in West Lakeland.	See General Comment Response A(ii)



Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/23/2018	Brad	Cornell	Mail	92C	The MAC representatives have said they do not monitor what nor do they control what flies in or out of the airport.	<p>MAC maintains a voluntary noise abatement plan at the Airport that prescribes preferred flight procedures, preferred runway use, designated maintenance run-up areas, and nighttime training procedures for minimizing aircraft noise exposure in noise-sensitive areas surrounding the Airport. To view the Noise Abatement Plan for Lake Elmo Airport, visit <a href="http://www.macnoise.com/other-mac-airports/lake-elmo-airport-21d">www.macnoise.com/other-mac-airports/lake-elmo-airport-21d</a>. The MAC has also installed “fly neighborly” signs around the Airport and provides resources such as pilot briefings and guides to educate Airport users about the importance of minimizing noise effects to Airport neighbors. In addition, the MAC encourages tenants at Lake Elmo Airport to follow the voluntary Noise Abatement Plan for the Airport and takes its responsibility to respond to community concerns seriously. The MAC plans to establish an airport advisory commission to track trends in aircraft operations and aircraft noise complaints to address future concerns about noise and noise abatement at the Airport. In addition, the MAC will update the existing voluntary noise abatement plan and hold educational briefings for pilots to help reduce noise. MAC also manages a website and operates a noise complaint and information hotline for all its airports. For information about noise programs, view airport operations, or file noise complaints, please visit <a href="http://www.macnoise.com">www.macnoise.com</a>.</p> <p>However, there are many circumstances when noise impacts from the Airport cannot be abated. Federal grant provisions require that the Airport be operated in a manner that does not discriminate on the basis of type or class of aircraft or aviation</p>

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						activity and does not restrict or place an undue burden on interstate commerce. As a “public-use” airport, Lake Elmo Airport is subject to federal regulations. A congressional act passed in 1990 (the Airport Noise and Capacity Act) limits the ability of airport operators to impose access or use restrictions based on aircraft noise. As a result, airport operators cannot restrict aircraft operations at an airport (such as closing the airport to jets or closing it at night) to control noise. Today, any U.S. airport that employs access or use restrictions designed for noise control had them in place prior to the 1990 act and were grandfathered in by Congress.
4/23/2018	Brad	Cornell	Mail	92D	<p>We have asked MAC over the past 30 years many questions and always got vague answers to simple questions like the ones listed below:</p> <ol style="list-style-type: none"> <li>1. How is it that MAC updates a long term comprehensive plan, expecting the townships to just ok it and change zoning around the airport when the airport is no longer compliant with the zoning already established for 60 years? The townships long term comprehensive plans are the ruling documents at the local level not the other way.</li> </ol>	See General Comment Response F(ii)
4/23/2018	Brad	Cornell	Mail	92E	<ol style="list-style-type: none"> <li>2. Why is it that MAC never attended any planning meetings or public hearings when land around the airport was being developed?</li> </ol>	As an adjacent jurisdiction, the MAC reviews and comments on proposed development activity in the vicinity of Lake Elmo Airport. On several occasions, the MAC has provided written comments expressing concern with several aspects of residential development near the airport, including the potential for aircraft overflights and noise as well as the potential for stormwater ponds to attract wildlife. The MAC’s written comments also

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						requested that prospective property buyers be provided information about the properties' location relative to the Lake Elmo Airport, existing aircraft operations over the area, and the fact that the MAC plans include construction of a realigned and longer primary runway and an extension to the crosswind runway. See also General Comment Response I(iii).
4/23/2018	Brad	Cornell	Mail	92F	3. How is it that MAC has spent almost a million dollars preparing for this long term comprehensive plan, having an Environmental impact study done prior to the plan being accepted by the townships?	<p>The MAC's Long-Term Comprehensive Plans are adopted by the MAC full Commission and the Metropolitan Council must review the plan and determine whether or not it is consistent with the regional Transportation Policy Plan (TPP), which includes the Regional Aviation System Plan. There are no requirements for local communities to formally approve the MAC's Long-Term Comprehensive Plans. That said, the MAC understands and values the importance of involving surrounding jurisdictions in long-term planning and environmental reviews of airport improvement projects. The MAC involved surrounding jurisdictions in the long-term planning and environmental review processes. MAC staff met with community leaders prior to any formal action taken on the Lake Elmo Airport 2035 Long-Term Comprehensive Plan and continued to hold meetings and events throughout the planning process and environmental review. As a result, the following adjustments were made:</p> <ul style="list-style-type: none"> <li>- Altering plans to realign 30th Street based on community feedback, so that it will tie in with the existing four-way intersection at Neal Avenue</li> <li>- Reducing the proposed length of Lake Elmo's primary runway from 3,600' to 3,500' – still one of the</li> </ul>

Date	First Name	Last Name	Source	Comment ID	Comment	Response
						<p>shortest primary runways in the MAC reliever system</p> <ul style="list-style-type: none"> <li>- Attempting to further address 30th Street concerns by proposing a number of other viable configuration options, none of which the community favored over the currently planned alignment with the four-way intersection</li> </ul>
4/23/2018	Brad	Cornell	Mail	92G	4. Why is it that MAC started this plan/project back in 2013 long before coming to the townships to indicate a change from previous plans?	MAC staff met with community leaders prior to any formal action being taken on the Lake Elmo Airport 2035 Long-Term Comprehensive Plan and continued to hold meetings and events throughout the planning process and environmental review.
4/23/2018	Brad	Cornell	Mail	92H	5. Where's the cost analysis to prove this is good use of FAA money when the airport population has been declining for the past 30 years?	See General Comment Response J(iv)
4/23/2018	Brad	Cornell	Mail	92I	<p>6. Where is the data to prove the statement that larger aircraft won't come to the Lake Elmo Airport after completion?</p> <p>7. Why is it that MAC does not have data to support larger aircraft won't come to this airport?</p> <p>7a. Mac should have data to support once the airport runway is lengthened, larger aircraft will come to Lake Elmo where is this study?</p>	See General Comment Response A(i)
4/23/2018	Brad	Cornell	Mail	92J	<p>8. How can MAC claim the longer runway is needed for safety of the existing users of the Lake Elmo Airport?</p> <p>8a. If it's not safe for the pilots now aren't they in danger of personal injury now?</p> <p>8b. How is it that MAC can claim the local neighbors are safe today when pilots claim it's dangerous to fly out from Lake Elmo Airport?</p> <p>8c. Isn't it the pilots' responsibility to themselves and others to fly safely?</p>	See General Comment Response P

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					<p>8d. If the need for safety is the primary issue, then why has MAC not managed the based aircraft for proper size nor the transient aircraft using the airport for safe operations but allowed miss use?</p> <p>9. How can MAC put over 1500 users of 30<sup>th</sup> street at risk with a multi curved road where a straight 50MPH road exists today as a major township road for commuting to and from work every day?</p>	
4/23/2018	Brad	Cornell	Mail	92K	<p>10. Why is it that MAC believes this is not expansion, adding lighting to a non-lit runway, Adding terminal lighting for night operations, Adding more taxis way, constructing run-up locations near neighbors to name a few new additions that create noise, light pollution that is neither present today nor consistent with the voluntary noise abatement in place today?</p>	See General Comment Response A(i)
4/23/2018	Brad	Cornell	Mail	92L	<p>11. Why is it that MAC can ignore state rules for safety zones wouldn't MAC want to be compliant...All of these new additions indicate flight operation expansion heavier use, more noise will be disruptive to the neighbors.</p>	See General Comment Response F(iii)
4/23/2018	Brad	Cornell	Mail	92M	<p>12. MAC needed to provide a detailed cost analysis of each alternative proposal in detail, to justify the costs differences? This would enable the residents and MAC to discuss each of these substantial differences of how much?</p>	<p>As noted in Section 3.3.2, the estimated cost of reconstructing the existing airfield in its current configuration is \$5.4 million. As noted in Section 3.3.3 and 3.3.4, the estimated cost for the relocated Runway 14/32 and associated taxiways under Alternative B and Alternative B1 (preferred alternative) are \$9.6 million and \$9.3 million, respectively. As noted in Section 3.2.5, the estimated cost of extending Runway 04/22 is \$600,000. Cost estimates for 30th Street North Alternatives 3, 4A, and 4B are presented in Appendix B.</p>



Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/23/2018	Brad	Cornell	Mail	92N	13. Provide detailed cost return on investment analysis for the federal money to acquire property over the life of the airport improvements over the life of the airport?	FAA policy does not require a benefit-cost analysis for projects undertaken solely for the objective of safety, security, conformance with FAA standards, or environmental mitigation. Therefore, a benefit cost analysis is not required for this project.
4/23/2018	Brad	Cornell	Mail	92O	14. Provide the cost benefit between closing and just provide minimal updates? 15. Wouldn't actually closing generate a significant financial benefit for MAC to return this unused land back to the owners, 640 acres as prime real estate in the metro area is a substantial dollar amount in land alone, on the order of 256 2.5 acre home sites at a rough retail cost of \$200,000 each is \$51.2 million plenty to assist the current residents of the airport to move to different airports?	Because Lake Elmo Airport performs a critical function within the MAC reliever airport system and FAA National Plan of Integrated Airport Systems (NPIAS), closing the airport without relocating it elsewhere is not a practicable alternative. Relocating the Airport is considered in Section 3.2.2 of the Draft EA/EAW, which states that relocation of the Airport is not practicable or feasible because of land acquisition and other costs associated with construction of a new airport.
4/23/2018	Brad	Cornell	Mail	92P	My last comments: The MAC planning team and upper management has been poor neighbors for the past 30 years. The only time they come to our town meeting is to bring planning changes that are not welcome with any consideration to the neighborhood.	See General Comment Response I(i) and I(iii)
4/23/2018	Brad	Cornell	Mail	92Q	The pilots at Lake Elmo for the most part are considerate, although there are a few who don't stay in the zones, fly low, wait till late to do night take off and landings to name a few.	See General Comment Response Q. Some pilots need to conduct specific currency training at night. According to the federal regulations governing pilot certification (14 CFR Part 61), in order for pilots to be able to carry passengers at night, they need to make at least three takeoffs and landings to a full stop in the preceding 90 days during the nighttime. This ensures they keep current on their night takeoff and landing experience.
4/23/2018	Brad	Cornell	Mail	92R	The transient users are helicopters from down town to do practice; all they do is create noise, loud noise even at late hours	See General Comment Response D. Lake Elmo Airport does not have an officially designated helipad facility but is

Date	First Name	Last Name	Source	Comment ID	Comment	Response
					with no regard to neighbors and MAC does nothing about it.	open to use by helicopters. The MAC encourages both aircraft and helicopter operators using Lake Elmo Airport to be good neighbors by following the voluntary Noise Abatement Plan, and takes its responsibility to respond to community concerns seriously.
4/23/2018	Brad	Cornell	Mail	92S	MAC has a noise complaint web site but you have never provided statics on how many complaints or done the research to see who is creating the noise, why is this?	Each quarter the MAC reports the number of aircraft noise complaints, locations filing an aircraft noise complaint, number of operations and the aircraft types that have generated noise complaints through an interactive reporting website available here: <a href="https://www.macenvironment.org/reports/relievers.html">https://www.macenvironment.org/reports/relievers.html</a> .  The MAC plans to establish an airport advisory commission to address future concerns about noise and noise abatement at the Airport. These quarterly reports will be shared and discussed with the airport advisory commission.  See also General Comment Response D.
4/23/2018	Brad	Cornell	Mail	92T	I truly believe this project is to bring larger aircraft to Lake Elmo in an attempt to keep it from closing because of continued lower use of the airport in the past 30 years.	See General Comment Response A(i)
4/23/2018	Brad	Cornell	Mail	92U	The days of this plan for expansion is long gone, like 50+ years past. It wasn't needed in 1965 it's not needed now with even fewer operations declining every year. MAC needs to realize this plan is obsolete and the cost of almost a million dollars was a waste and they should accept the existing size, classify it as recreational or close it.	See General Comment Response H
4/23/2018	Brad	Cornell	Mail	92V	Rebuilding the existing runways if needed	See General Comment Response C(iii)
4/23/2018	Brad	Cornell	Mail	92W	but remove the onsite helicopter support,	See response to Comment 92R above.
4/23/2018	Brad	Cornell	Mail	92X	keep the trees to minimize the light and noise pollution,	See General Comment Response M(ii)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/23/2018	Brad	Cornell	Mail	92Y	a solid fence that is proposed is just a bad eye sore.	See General Comment Response E
4/23/2018	Brad	Cornell	Mail	92Z	MAC does not even maintain the existing chain link fence installed post 911; one look at it along 30 <sup>th</sup> street and Neal show the lack of MAC support. This does demonstrate MAC's management does not support this airport being maintained. That is why the runways are in poor condition	The MAC rehabilitated both runways recently. In 2012, a mill and overlay was completed, including joint crack repair, for the center 40-foot pavement section of Runway 14/32. This project was completed to correct uneven conditions in the runway profile and extend the life of the runway at minimal cost. However, this was a short-term improvement, as the pavement will eventually fail and need to be rebuilt. Furthermore, issues remain with uneven pavement conditions during freeze and thaw cycles, causing the Airport to issue notices to airmen (NOTAMs) in 2016 and 2017 cautioning pilots that the runway has uneven pavement breaks in the asphalt due to frost heaves. In 2013, a joint and crack repair project was completed for Runway 04/22, and additional crack sealing for this runway was completed in 2015. For both runways, the recent rehabilitation efforts represent short-term repairs to keep pavement near the end of its useful life in a serviceable condition. This information has been added to Section 2.2.1 of the Final EA/EAW.
4/23/2018	Brad	Cornell	Mail	92AA	and only now attempting to justify spending money on the Lake Elmo Airport by expanding the services to accommodate or attract larger aircraft and keep it in the MAC reliever system.	The project contemplated by the EA/EAW is being proposed to support use of the Airport by the aircraft using it today. The family of aircraft at the Airport is not expected to change. The reasons for implementing the project are identified in Chapter 2, Purpose and Need. The Airport is owned by the MAC and will be part of the MAC reliever system regardless of the facilities available there.  For more information, see General Comment Response A(i)

Date	First Name	Last Name	Source	Comment ID	Comment	Response
4/23/2018	Brad	Cornell	Mail	92AB	MAC should return this airport to MNDOT for management where it can be maintained and follow state rules.	MnDOT does not typically own or manage individual airports.
4/23/2018	Laura	Kaschmitter	Mail	93A	I am opposed to any expansion at the Lake Elmo Airport.	Comment noted
4/23/2018	Laura	Kaschmitter	Mail	93B	I am very concerned about the recent issues with contaminated groundwater. You have stated in the EAW that our wells would not be affected by any construction done at Lake Elmo Airport. Yet no evidence has been presented as to how this will be prevented.	See General Comment Response N
4/23/2018	Laura	Kaschmitter	Mail	93C	If your plan does not work and our water becomes contaminated what is the plan to fix this? We are not on city water and sewer.	As noted in Appendix H, the highest elevation of the contaminated aquifers is located at a depth more than 50 feet below the Airport ground surface elevation. Proposed project activities would not approach a depth that would encounter or disturb these aquifers.  For more information, see General Comment Response N.
4/23/2018	Laura	Kaschmitter	Mail	93D	Also, I have always been confused by how the purpose and need of the MAC (unelected officials) is more important than the neighboring municipalities and their elected officials. Our elected officials represent many more people than the small number of pilots at the airport.	See General Comment Response I(ii)
4/23/2018	Laura	Kaschmitter	Mail	93E	Please re-consider this plan and repair the runway in its current position.	See General Comment Response C(iii)





# AFFIDAVIT OF PUBLICATION

STATE OF MINNESOTA ) ss  
COUNTY OF WASHINGTON

Darlene MacPherson being duly sworn on an oath, states or affirms that he/she is the Publisher's Designated Agent of the newspaper(s) known as:

Stillwater Gazette

with the known office of issue being located in the county of:

WASHINGTON

with additional circulation in the counties of: WASHINGTON

and has full knowledge of the facts stated below:

- (A) The newspaper has complied with all of the requirements constituting qualification as a qualified newspaper as provided by Minn. Stat. §331A.02.
- (B) This Public Notice was printed and published in said newspaper(s) once each week, for 1 successive week(s); the first insertion being on 03/02/2018 and the last insertion being on 03/02/2018.

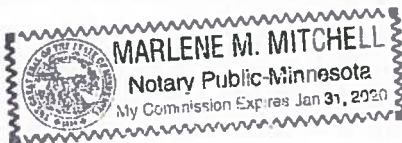
## MORTGAGE FORECLOSURE NOTICES

Pursuant to Minnesota Stat. §580.033 relating to the publication of mortgage foreclosure notices: The newspaper complies with the conditions described in §580.033, subd. 1, clause (1) or (2). If the newspaper's known office of issue is located in a county adjoining the county where the mortgaged premises or some part of the mortgaged premises described in the notice are located, a substantial portion of the newspaper's circulation is in the latter county.

By: D. MacPherson  
Designated Agent

Subscribed and sworn to or affirmed before me on 03/02/2018 by Darlene MacPherson.

Marlene M. Mitchell  
Notary Public



### Rate Information:

(1) Lowest classified rate paid by commercial users for comparable space:  
\$40.00 per column inch

Ad ID 788027

## METROPOLITAN AIRPORTS COMMISSION NOTICE OF DRAFT EA/EAW AVAILABILITY & PUBLIC HEARING LAKE ELMO AIRPORT ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL ASSESSMENT WORKSHEET FOR PROPOSED AIRFIELD IMPROVEMENTS

Notice is hereby given that on the 4th day of April 2018 in the Auditorium at the Oak-Land Middle School in Lake Elmo, Minnesota, the Metropolitan Airports Commission (MAC) will hold a public hearing to receive testimony relative to the draft federal Environmental Assessment (EA) / state Environmental Assessment Worksheet (EAW). The MAC will hold the public hearing on:

Wednesday, April 4, 2018  
6:00 p.m. Open House  
6:30 p.m. Staff Presentation  
7:00 p.m. Public Hearing  
Oak-Land Middle School Auditorium  
820 Manning Avenue North  
Lake Elmo, MN 55042

During the EA/EAW process, the MAC and its consultant studied and analyzed the environmental impacts of proposed airfield improvements at Lake Elmo Airport. In accordance with its responsibilities under the National Environmental Policy Act (NEPA), the Federal Aviation Administration (FAA) requires the MAC to complete an EA to obtain federal funding for the improvements. The MAC is also responsible under State law for completing an EAW, which was completed concurrently. During the EA/EAW process, numerous environmental categories were reviewed for possible effects. In addition to direct environmental effects, the process considered the related social and economic effects. The EA/EAW process involved extensive public outreach and opportunities for public involvement, including three public information meetings and regularly convening a community panel as the draft document was developed. The results of the analysis are published in the Draft EA/EAW document, which is available for download on the project website: <https://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Documents-and-Links.aspx>

Written comments will be accepted until 5:00 p.m. on April 19, 2018. Written comments can be submitted via email to [ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org), submitted in-person at the Public Hearing, or mailed to:

Lake Elmo Airport EA/EAW Comments  
c/o MAC Environment Department  
6040 28th Avenue South  
Minneapolis, MN 55450

Published in the  
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March 2, 2018  
788027

# Affidavit of Publication

State of Minnesota

} ss

County of Washington

**ROBIN NISSWANDT**

\_\_\_\_\_ being duly sworn, on oath, says that he/she is the publisher or authorized agent and employee of the publisher of the newspaper known as OAKDALE/LAKE ELMO REVIEW, and has full knowledge of the facts which are stated below:

(A) The newspaper has complied with all of the requirements constituting qualification as a qualified newspaper, as provided by Minnesota Statute 331A.02, 331A.07, and other applicable laws, as amended.

(B) The printed NOTICE

\_\_\_\_\_ which is attached was cut from the columns of said newspaper, and was printed and published once each week, for 1 successive weeks; it was first published on WEDNESDAY, the 7<sup>TH</sup> day of MARCH, 2018, and was thereafter printed and published on every \_\_\_\_\_ to and including \_\_\_\_\_, the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_; and printed below is a copy of the lower case alphabet from A to Z, both inclusive, which is hereby acknowledged as being the size and kind of type used in the composition and publication of the notice:

\*ABCDEFGHIJKLMN OPQRSTUVWXYZ  
\*ABCDEFGHIJKLMN OPQRSTUVWXYZ  
\*abcdefghijklmn opqrstuvwxyz

BY: Robin Nisswandt  
TITLE LEGAL COORDINATOR

Subscribed and sworn to before me on this 7<sup>TH</sup> day of MARCH, 2018.

Tonya R. Whitehead  
Notary Public

\*Alphabet should be in the same size and kind of type as the notice.



### RATE INFORMATION

- (1) Lowest classified rate paid by commercial users for comparable space ..... \$25.00 per col. inch
- (2) Maximum rate allowed by law for the above matter ..... \$25.00 per col. inch
- (3) Rate actually charged for the above matter..... \$ \_\_\_\_\_ per col. inch

01/18

**m** MINNESOTA  
ENVIRONMENTAL QUALITY BOARD  
**The EQB Monitor**

520 Lafayette Road North, Saint Paul, MN 55155 - [www.eqb.state.mn.us](http://www.eqb.state.mn.us)  
[EQB.Monitor@state.mn.us](mailto:EQB.Monitor@state.mn.us) - (651) 757-2873

**Publication Date: February 26, 2018**  
Vol. 42, No. 9

**Publication Schedule: Mondays at 8:00 AM**  
**Submission Deadline: [View 2018 Schedule](#)**  
Use the [EQB Monitor Submission Form](#)

**In this publication:**

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- [Environmental Impact Statement Need Decisions](#)
- [Environmental Assessment Worksheets](#)
- [Environmental Assessment Worksheet Joint State and Federal EA/EAW](#)
- [Notices](#)

The *EQB Monitor* is a weekly publication announcing environmental review documents, public comment periods and other actions of the Environmental Quality Board. For more information on environmental review, please visit the [EQB website](#).

You can manage your subscription to the *EQB Monitor* [here](#). Be sure to add [MNEQB@public.govdelivery.com](mailto:MNEQB@public.govdelivery.com) to your address book or safe sender list.



Check the [EQB Calendar](#) for more details on *Monitor* deadlines and Board Meetings. Meeting minutes, agendas and additional notices are also posted on the [EQB Website](#). You can also find us on [Twitter](#) and [Facebook](#).

## **EQB Announcements**

### **Citizen Environmental Review Survey**

The Environmental Quality Board, which oversees the state's Environmental Review program, is undergoing a continuous improvement project to monitor and improve the effectiveness of Environmental Review. Minnesota citizens who have participated in the Environmental Review process are asked to consider taking 10 minutes to complete the survey at the link below. Engagement in the process may include: reviewed a document, attended a public meeting, wrote a comment, contacted staff, etc.

<http://survey.mn.gov/s.asp?k=151335922389>

**Contact Person:**

Kristin Mroz  
Environmental Review Program Staff  
520 Lafayette Road  
St. Paul, MN 55155  
651-757-2873  
[env.review@state.mn.us](mailto:env.review@state.mn.us)

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## Petitions

The following petition has been filed with the EQB requesting preparation of an Environmental Assessment Worksheet (EAW). The EQB has assigned the indicated unit of government to review the petition and decide on the need for an EAW.

- Waseca County, Waseca County Ditch No. 48
- 

## Environmental Impact Statement Need Decisions

The noted responsible governmental unit has determined the following projects do not require preparation of an Environmental Impact Statement. The dates given are, respectively, the date of the determination and the date the Environmental Assessment Worksheet notice was published in the EQB Monitor.

- South Washington Watershed District, Afton Alps Trout Brook Stream Restoration EIS Need Decision, 2-13-18 (1-1-18)
  - Minnesota Pollution Control Agency, Lamont Swine, LLC, 2-12-18 (12-11-17)
  - Minnesota Pollution Control Agency, Walters Recycling and Refuse, Inc., 2-13-18 (12-11-17)
- 

## Environmental Assessment Worksheets

### Project Title: Northland Lindstrom

**Comment Deadline:** March 28, 2018

**Project Description:** Northland Lindstrom is a three story residential apartment mixed use complex on 2.69 acres south of US Highway 8 and east of South Lindstrom Lake in Lindstrom, Minnesota. In addition to the 105 apartment units, the new site will have a lakeside restaurant with one large dock system, replacing a bistro, a commercial marina with gasoline service, and two single family homes currently in use on the site. The EAW may be viewed at City Hall or at the Chisago Lakes Area Library. It also can be downloaded from the Lindstrom Planners website at <https://tinyurl.com/NorthlandEAW>. The Planning Commission will be reviewing this EAW at their March 7, 2018 meeting. The comment period will end on March 28, 2018.

**Responsible Governmental Unit (RGU):** City Administrator

**RGU Contact Person:**

John Olinger  
City Administrator  
13292 Sylvan Avenue  
Lindstrom, MN 55045  
651-257-0625  
[jolinger@cityoflindstrom.us](mailto:jolinger@cityoflindstrom.us)



# Environmental Assessment Worksheet Joint State and Federal EA/EAW

## Project Title: Lake Elmo Airport Runway 14/32 Relocation/Extension & Associated Improvements

**Comment Deadline:** April 19, 2018 by 5:00 p.m. CDT

**Project Description:** The Metropolitan Airports Commission has prepared a draft federal Environmental Assessment / state Environmental Assessment Worksheet (EA/EAW) for proposed airfield improvements at the Lake Elmo Airport (FAA identifier 21D). The proposed project falls within a mandatory EAW category under Minnesota Administrative Rule 4410, Section 4300, which declares that a State EAW is required "for construction of a paved, new airport runway."

The EA/EAW has been prepared under the Minnesota Environmental Policy Act (MEPA), which requires the Minnesota Department of Transportation (MnDOT) and other state agencies to consider the environmental effects of its actions. Because the project will utilize federal funding, it also requires a federal EA under the National Environmental Policy Act (NEPA). According to Minnesota Rule 4410.1300, the project proposer may circulate a federal EA in place of the state EAW form, provided the EA addresses each of the environmental effects identified in the EAW form. The draft EA/EAW fulfills the informational requirements of the EAW and contains the Minnesota EAW content, as provided in Minnesota Rule 4410.1200.

The draft EA/EAW identifies a preferred alternative and evaluates the effects of this alternative on the surrounding natural, social, and economic environments. The proposed action consists of the following components:

- Relocate Runway 14/32 by shifting 615 feet to the northeast and extend to 3,500 feet, including grading, clearing, and runway lighting.
- Extinguish existing prescriptive easement for 30th Street North and seek, as appropriate, a land release from the Federal Aviation Administration (FAA) to allow realignment of 30th Street North around the new Runway 32 Runway Protection Zone (RPZ) to reconnect with the existing Neal Avenue North intersection.
- Relocate the Airport perimeter fence to reflect the new Runway 32 RPZ.
- Remove the existing north side taxiway and compass calibration pad and construct a new cross-field taxiway to serve the new Runway 14 end, including taxiway lighting and/or reflectors.
- Convert existing Runway 14/32 to a partial parallel taxiway and remove the portion of the existing parallel taxiway south of the Runway 04 threshold.
- Reconstruct Runway 4/22 and extend to 2,750 feet, including necessary lighting and taxiway connectors.
- Construct other taxiways and engine run-up pads as needed to support the relocated Runway 14/32 and extended Runway 04/22, including connector taxiways and a full-length parallel taxiway on the north side of the relocated Runway 14/32, and install taxiway lighting and/or reflectors.
- Relocate the compass calibration pad adjacent to the new partial parallel taxiway (converted Runway 14/32).
- Establish non-precision GPS-based instrument approach procedures to all runway ends not already equipped.
- Provide Runway 14/32 lighting systems with the relocated runway.
- Install medium intensity runway edge lights (MIRL) on Runway 4/22, precision approach path indicators (PAPIs) on the Runway 4, 14, and 22 ends, and runway end identifier lights (REIL) on each end of Runway 4/22.
- Remove approximately 20 acres of on-Airport trees and individual off-Airport trees as necessary to clear trees that penetrate FAA Threshold Siting Surfaces (TSS)/Part 77 approach and transitional surfaces.
- Install obstruction lighting on fixed base operator (FBO) and hangar buildings in the United States Standard for Terminal Instrument Procedures (TERPS) departure surface areas beyond Runway 4, 14, and 22 ends.
- Construct an on-Airport access road connecting the north and west building areas.
- Voluntarily explore creation of Rusty Patched Bumble Bee/pollinator habitat on Airport property southwest of proposed 30th Street North realignment.



Agencies listed on the current Minnesota EQB distribution list have been notified regarding availability of electronic EA/EAW documents on the project website. The electronic EA/EAW documents are available on the project website at <https://metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Documents-and-Links.aspx>. Hard copies are available for review at the Lake Elmo City Hall, Lake Elmo Public Library, and the Baytown Community Center. Hard copies are available upon request.

The MAC will hold the public hearing on:

Wednesday, April 4, 2017  
6:00 p.m. Open House  
6:30 p.m. Staff Presentation  
7:00 p.m. Public Hearing  
Oak-Land Middle School Auditorium  
820 Manning Avenue North  
Lake Elmo, MN 55042

Written comments will be accepted until 5:00 p.m. on April 19, 2018. Written comments can be submitted via email to [ContactLakeElmoAirportEA@mspmact.org](mailto:ContactLakeElmoAirportEA@mspmact.org), submitted in-person at the Public Hearing, or mailed to:

Lake Elmo Airport EA/EAW Comments  
c/o MAC Environment Department  
6040 28th Avenue South  
Minneapolis, MN 55450

**Responsible Governmental Unit (RGU):** Metropolitan Airports Commission

**RGU Contact Person:**

Chad Leqve  
Director of Environment  
6040 28th Avenue South  
Minneapolis, MN 55450  
612-725-6326  
[chad.leqve@mspmact.org](mailto:chad.leqve@mspmact.org)

## Notices

### Minnesota Department of Agriculture--Notification of Release of Genetically Engineered Organisms

**Project Description:** Pioneer Hi-Bred International filed a Notification for Release of a Genetically Engineered Organism with the Minnesota Department of Agriculture, MDA notification number 18-NO-09. Notification is for genetically modified SOYBEAN, pending USDA-APHIS Biotechnology Regulatory Services (BRS) approval for the environmental release of transgenic soybean, referenced as Application Number 18-018-101n. The counties identified for release include the following: Blue Earth-1 location with 80 acres. Project categories include AP (Agronomic Properties), FR (Fungal Resistance), HT (Herbicide Tolerance), IR (Insect Resistance), MG (Marker Gene), OO (Other), and PQ (Product Quality).

**Project Description:** Pioneer Hi-Bred International filed a Notification for Release of a Genetically Engineered Organism with the Minnesota Department of Agriculture, MDA notification number 18-NO-10. Notification is for genetically modified CORN, pending USDA-APHIS Biotechnology Regulatory Services (BRS) approval for the environmental release of transgenic corn, referenced as Application Number 18-016-102n. The counties identified for release include the following: Freeborn-2 locations with 10 acres per location. Project categories include AP (Agronomic Properties), HT (Herbicide Tolerance), IR (Insect Resistance), and MG (Marker Gene).

**Project Description:** Pioneer Hi-Bred International filed a Notification for Release of a Genetically Engineered Organism with the Minnesota Department of Agriculture, MDA notification number 18-NO-11. Notification is for genetically modified CORN, pending USDA-APHIS Biotechnology Regulatory Services

(BRS) approval for the environmental release of transgenic corn, referenced as Application Number 18-018-103rm. The counties identified for release include the following: Blue Earth-2 locations with up to 25 acres per location; Brown-1 location with 25 acres, Fillmore-1 location with 4.5 acres, and Swift-1 location with 15 acres. Project categories include AP (Agronomic Properties), HT (Herbicide Tolerance), MG (Marker Gene), and OO (Other).

**Project Description:** NuSeed Americas filed a Notification for Release of a Genetically Engineered Organism with the Minnesota Department of Agriculture, MDA notification number 18-NO-12. Notification is for genetically modified CANOLA, pending USDA-APHIS Biotechnology Regulatory Services (BRS) approval for the environmental release of transgenic canola, referenced as Application Number 18-031-102n. The counties identified for release include the following: Red Lake-1 location; Wilken-1 location. Project categories include MG (Marker Gene), and PQ (Product Quality).

**Project Description:** Rutgers University filed a Notification for Release of a Genetically Engineered Organism with the Minnesota Department of Agriculture, MDA notification number 18-NO-13. Notification is for genetically modified WHEAT, pending USDA-APHIS Biotechnology Regulatory Services (BRS) approval for the environmental release of transgenic wheat, referenced as Application Number 18-102-104rm. The counties identified for release include the following: Dakota – 1 location, <1 acre. Project categories include FR (Fungal Resistance).

**Project Description:** Pioneer Hi-Bred International filed a Notification for Release of a Genetically Engineered Organism with the Minnesota Department of Agriculture, MDA notification number 18-NO-14. Notification is for genetically modified SOYBEAN, pending USDA-APHIS Biotechnology Regulatory Services (BRS) approval for the environmental release of transgenic soybean, referenced as Application Number 18-030-103n. The counties identified for release include the following: Blue Earth-1 location with 80 acres. Project categories include HT (Herbicide Tolerance), IR (Insect Resistance), and OO (Other).

**Responsible Governmental Unit (RGU):** Minnesota Department of Agriculture; Plant Protection Division

**RGU Contact Person:**

Denise Thiede  
Section Manager  
625 Roberts Street North  
St. Paul, MN 55155  
651-201-6531  
[denise.thiede@state.mn.us](mailto:denise.thiede@state.mn.us)

# Official Notices

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## **Metropolitan Airports Commission (MAC) Notice Of Draft EA/EAW Availability & Public Hearing for Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet for Proposed Airfield Improvements**

Notice is hereby given that on the 4th day of April 2018 in the Auditorium at the Oak-Land Middle School in Lake Elmo, Minnesota, the Metropolitan Airports Commission (MAC) will hold a public hearing to receive testimony relative to the draft federal Environmental Assessment (EA) / state Environmental Assessment Worksheet (EAW). The MAC will hold the public hearing on:

Wednesday, April 4, 2018

6:00 p.m. Open House  
6:30 p.m. Staff Presentation  
7:00 p.m. Public Hearing

Oak-Land Middle School Auditorium  
820 Manning Avenue North  
Lake Elmo, MN 55042

During the EA/EAW process, the MAC and its consultant studied and analyzed the environmental impacts of proposed airfield improvements at Lake Elmo Airport. In accordance with its responsibilities under the National Environmental Policy Act (NEPA), the Federal Aviation Administration (FAA) requires the MAC to complete an EA to obtain federal funding for the improvements. The MAC is also responsible under State law for completing an EAW, which was completed concurrently. During the EA/EAW process, numerous environmental categories were reviewed for possible effects. In addition to direct environmental effects, the process considered the related social and economic effects. The EA/EAW process involved extensive public outreach and opportunities for public involvement, including three public information meetings and regularly convening a community panel as the draft document was developed. The results of the analysis are published in the Draft EA/EAW document, which is available for download on the project website: <https://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Documents-and-Links.aspx>

Written comments will be accepted until **5:00 p.m. on April 19, 2018**. Written comments can be submitted via email to [ContactLakeElmoAirportEA@nspmac.org](mailto:ContactLakeElmoAirportEA@nspmac.org), submitted in-person at the Public Hearing, or mailed to:

Lake Elmo Airport EA/EAW Comments  
c/o MAC Environment Department  
6040 28th Avenue South  
Minneapolis, MN 55450

## **Minnesota Pollution Control Agency (MPCA)**

### **Watershed Division**

### **Notice of Availability and request for comment on the Draft Watershed Restoration and Protection Strategies (WRAPS) and Total Maximum Daily Load (TMDL) Reports (Reports) for the Duluth Urban Area Streams Subwatershed**

**Public Comment Period Begins: March 19, 2018**

**Public Comment Period Ends: 4:30 P.M. on April 18, 2018**

The Minnesota Pollution Control Agency (MPCA) is requesting comments on the WRAPS and TMDL Reports for the Duluth Urban Area Streams Subwatershed. The draft Reports are available for review at:

<https://www.pca.state.mn.us/water/total-maximum-daily-load-tmdl-projects>.



# MEETING ATTENDANCE SHEET

BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND MAY BE INCLUDED IN A PUBLIC DOCUMENT.

NAME	CITY	ADDRESS (OPTIONAL)	REPRESENTING
MARY VIERLING	W LAKELAND		
TOM VIERLING	W LAKELAND		
PAUL HOVE	ST. PAUL	12 W SANDRALEE DR	210 PILOTS
JEFF HOVE	ST. PAUL	25 Flandrau Pl 55106	Lake Elmo Airport Pilots
RICK WEYBACH	DAYTOWN TWP.	13710 51 <sup>ST</sup> ST. A.	DAYTOWN TWP.
Jonathan Schmeltz	Lake Elmo		
DAN BEGGSTROM	STILLWATER	12171 PARADE AVE N. <sup>55082</sup> STILLWATER	210 PILOT
Pave Becker	St Paul	10 Warren St. St. Paul, 55114	210 Pilot
John Krack	Fridley	7629 Lakeside Rd. NE Fridley <sup>55422</sup>	RAC
Lowell Scherer	Lake Elmo	4574 Lakeside	
Tom McElion	St. Cloud		
LORI Giergen + Rich	West Lakeland	14148 10 <sup>TH</sup> ST. N Stillwater 55082	TALKERS CLUB
MARK MONTANA	W. LAKELAND	2939 New Ave N	Resident
PAVE SCHAULTZ	W. LAKELAND	16630 Ham St. N.	"
Jennifer Van Raast	W. LAKELAND	1440 No. Berkeley Ave N.	"
Kris Van Raast	W. Lakeland		





# MEETING ATTENDANCE SHEET

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NAME	CITY	ADDRESS (OPTIONAL)	REPRESENTING
Eileen + Paul Tunger	Lake Elmo/Westland	12140-24 <sup>th</sup> St N. Lake Elmo MN 55042	
Robert Hill	Westland	12291 27 <sup>th</sup> St N	
Dick Misko	Westland		
Larry Osterman	Lake Elmo	3800 Lowerme Ave Lake Elmo	
Derek Gilbert			
RAYMOND LUCKSINGER	WESTLAND	12775 5 <sup>th</sup> St No	
Jeanmarie Oppenend	Westland	1741 Newlyn Ave N	
Janel Surgenor	Lake Elmo		
Chuck Skoglund	Lake Elmo		
Dennis Cornell	Westland	2733 Neale Ave. N.	
Charles Hoover	Oakdale		
James Roth	Westland and Westland		
Lynette Spitzer	Westland		
Mike Mudge	MAC		
Stephen Buckingham	W. Land		
Ashleigh Lundy	W. Land		
Wes Hagan	W. Land	1720 Oakgreen Ave N	

Wednesday April 4, 2018 Public Hearing  
 Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet  
 Oak-Land Middle School Auditorium





# MEETING ATTENDANCE SHEET

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NAME	CITY	ADDRESS (OPTIONAL)	REPRESENTING
JOHN RENWICK	MINNEAPOLIS		C.E.P.
Ann Bucheck	Lake Elmo		
ROBERT KARNER	WESTLAKELAND TWP.		
MIKE WENDLER	Baytown		
Leif Erickson	Stillwater		
Patriek Fleming	Lake Elmo		
Joe Weis	Baytown Township	12651 40th Street N	
BARRY DAYTON	STILLWATER	9919 PRIMROSE AVE. N	
Sarah Fitzpatrick	<del>ST. PAUL</del> MPLS		FAA
Ben Tooss	west Lakeland	13178 24th St. Ct. N.	
Jack A. Regenold	ST. PAUL		Airport community
John C. Regenold	Roseville	545 Ryan Ave w. Roseville MN	Airport community
Cecilia Hanson	ST PAUL	1641 Cumberland St #33	
ALAN KUPFEASCHMIDT	Lake Elmo	2769 Legion Ave. N.	L.A. Elmo 210.
ANN PUNG-TORWEDO	<del>ST. PAUL</del> COI		WASHINGTON CITY
Lindsay Reidt	<del>ST. PAUL</del> ST. PAUL		SEH
Dave Wiehe	Lake Elmo		Community

Wednesday April 4, 2018 Public Hearing  
 Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet  
 Oak-Land Middle School Auditorium



# MEETING ATTENDANCE SHEET

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NAME	CITY	ADDRESS (OPTIONAL)	REPRESENTING
Daniel Kelly	West Lake Land	1991 Oldridge Ave N	West Lake Land Board
HANS SPITZER	WEST LAKELAND	2654 NEAL AVE N	CITIZEN
Broad Grove 11	West Lake Land	2733 Neal Ave N.	CITIZEN
CRAG BERGGEN	Stillwater	8565 NEAL AVE N #323	WLBELF
Erol Monson	Stillwater	13645 Greenwood T-N	
Stu Grubb	Grant		
SCOTT O'CONNOR	WBR		SELF
Roger Westenberg	College Grove	8653 JANEED AVES 5546	
Janet M. Hoja	West Lakeland	1120 Oakgreen Cir N.	Self
Carolyn Joppert	Lake Elmo		Self
Elizabeth Joppert	Lake Elmo		Self
Barry Rosell	West Lakeland	12233 27th ST N	Self
Marion Appelt	West Lakeland		Self
Del Frankhauer	Stillwater	12805 40th ST N	Self
John Hoeller	Lake Elmo	11834 44th St Lak N.	Fossil Humans Assoc
Steve Johnson	W. Lake Land	13595 Greenwood	Self
MOLLY K OLSON	West Lake Land		Self - Widents APPROVED //

Wednesday April 4, 2018 Public Hearing  
 Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet  
 Oak-Land Middle School Auditorium



# MEETING ATTENDANCE SHEET

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NAME	CITY	ADDRESS (OPTIONAL)	REPRESENTING
ROY WENZEL	Woodbury	3511 CRESTMOOR PT.	210 PILOTS
CYNTHIA FERIT	West Lakeland		Resident opposed
Laura Kaschmitter	West Lakeland		residents opposed
MICK KASCHMITTER	" " "		" "
Ken Ferit	" "		Resident Opposed
ANNE SCHWARTZ	West Lakeland		resident opposed
Bob Schwartz	west Lakeland		resident opposed
Scott Hanson	Woodbury		210 Pilots
JOHN GOZUM	W. LAKE LAND		210 PILOTS
Ron Fiedkone	Baytown	4220 Osgood Ave No	Baytown



# MEETING ATTENDANCE SHEET

BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND MAY BE INCLUDED IN A PUBLIC DOCUMENT.

NAME	CITY	ADDRESS (OPTIONAL)	REPRESENTING
JOHN J. REGENOCD	ST. PAUL	545 W. RYAN AVE ROSEVILLE MN	AIRPORT USER AIRBEEC OWNER EAA MEMBER
Keith Bergman	Lake Elmo	5833 Lake Elmo Ave. 55113	City of Lake Elmo
Bud Oust	Wassbury	212 Woodbury MN 55129	
John Grossen	Maple Grove		
Mitic Grossen	Lake Elmo	P.O. BOX 44 LAKE ELMO MN 55042	561
Gregg Adler	Afton	752 Indian Tr	55001





# MEETING ATTENDANCE SHEET

BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND MAY BE INCLUDED IN A PUBLIC DOCUMENT.

NAME	CITY	ADDRESS (OPTIONAL)	REPRESENTING
Pat Kasper	W Leokeland		my self
Rob Kewich	New Richmond	245 S. Knobel	New Richmond
Priss Owen	Het Council		Het Council

Wednesday April 4, 2018 Public Hearing  
 Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet  
 Oak-Land Middle School Auditorium



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METROPOLITAN AIRPORTS COMMISSION

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PUBLIC HEARING

RE:

LAKE ELMO AIRPORT

DRAFT ENVIRONMENTAL ASSESSMENT

ENVIRONMENTAL ASSESSMENT WORKSHEET

FOR PROPOSED AIRFIELD IMPROVEMENTS

April 4, 2018

7:00 PM

OAK-LAND MIDDLE SCHOOL

820 MANNING AVENUE NORTH

LAKE ELMO, MINNESOTA

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REPORTED BY:

Elizabeth J. Gangl

Registered Professional Reporter

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APPEARANCES

MAC COMMISSION:

Steve Cramer, Chair - Planning, Development &  
Environment  
Daniel Boivin, Commission Chair  
Rick King, Management & Operations Chair  
Don Monaco, Finance & Administration Chair  
Michael Madigan  
Richard Ginsberg

METROPOLITAN AIRPORTS COMMISSION STAFF PRESENT:

Cameron Boyd, General Counsel  
Jenn Felger, Planning, Development & Environment  
Committee Secretary  
Roy Fuhrmann, Chief Operating Officer  
Andrew Hanson, Law Clerk  
Joe Harris, Airport Manager - St. Paul Downtown/Lake  
Elmo  
Pat Hogan, Director - Public Affairs and Marketing  
Brad Juffer, Assistant Manager - Noise, Environment  
& Planning  
Mitch Kilian, Associate Vice President -  
Governmental Affairs  
Chad Leqve, Director - Environment  
Dana Nelson, Manager - Noise, Environment & Planning

1 METROPOLITAN AIRPORTS COMMISSION STAFF PRESENT (Cont'd):

2 Neil Ralston, Airport Planner

3 Bridget Rief, Vice President - Planning and  
4 Development

5 Brian Ryks, Executive Director/Chief Executive  
6 Officer

7 Atif Saeed, Vice President - Finance and Revenue  
8 Development

9 Gary Schmidt, Director - Reliever Airports

10 Evan Wilson, Senior Attorney

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1 CHAIR CRAMER: Good evening, everyone. We  
2 join the others in welcoming you here today and thank you  
3 for taking your time out on a somewhat still snowy  
4 evening to be here with us. I've got a little bit of a  
5 preamble to work through here and we can do that so we  
6 can put it into the record.

7 The April 4th, 2018 public hearing will now come  
8 to order. My name is Steve Cramer, and I am the Chair of  
9 the Planning, Development & Environment Committee of the  
10 Metropolitan Airports Commission. This Committee has  
11 been appointed as Hearing Officers for tonight's public  
12 hearing. With me this evening is the Chair of the  
13 Metropolitan Airports Commission, Dan Boivin, and MAC  
14 Commissioners. Why don't we just go down the row here  
15 and have each Commissioner introduce themselves, if they  
16 would, starting with Commissioner Madigan.

17 COMMISSIONER MADIGAN: Mike Madigan,  
18 District F.

19 COMMISSIONER GINSBERG: Rich Ginsberg,  
20 St. Paul.

21 COMMISSIONER MONACO: Don Monaco from  
22 Duluth.

23 COMMISSIONER KING: Rick King from Eden  
24 Prairie.

25 CHAIR CRAMER: Special thanks to

1 Commissioner Madigan. I know you spent a lot of time on  
2 this issue.

3 I welcome you all to tonight's public hearing.  
4 The purpose of this hearing is to provide the general  
5 public with an opportunity to comment on the Lake Elmo  
6 Airport Improvements Draft Environmental Assessment and  
7 Environmental Assessment Worksheet issued for public  
8 review. The Draft EA/EAW availability and a notice of  
9 this public hearing was posted on the MAC website,  
10 distributed through a GovDelivery subscription list,  
11 published in the Environmental Quality Board Monitor, the  
12 Minnesota State Register, the Pioneer Press, the  
13 Stillwater Gazette and the Oakdale/Lake Elmo Review. All  
14 announcements directed readers to the project website  
15 where the Draft EA/EAW could be reviewed.

16 Prior to this meeting a public open house was  
17 held at 6:00 p.m. and a presentation was provided at 6:30  
18 p.m. Additionally, as part of this process, the MAC  
19 developed and executed a formal stakeholder engagement  
20 plan in collaboration with community and airport user  
21 stakeholders. In addition to a comprehensive project  
22 website, this effort included newsletters, an E-news  
23 subscription list, public notifications, formation of the  
24 Community Engagement Panel and public events held at key  
25 milestones in the process. The last of the three



1 community events was held on November 6th, 2017 at the  
2 Oak-Land Middle School auditorium, focusing on the  
3 environmental effects of the proposed improvements.

4 The EA/EAW is being completed in order to  
5 initiate proposed airfield improvements identified in the  
6 2035 Lake Elmo Airport Long Term Comprehensive Plan,  
7 which was completed in 2016. The EA is required to  
8 comply with the federal National Environmental Policy Act  
9 and an EAW is required to comply with the Minnesota  
10 Environmental Policy Act. The Federal Aviation  
11 Administration is the lead federal agency responsible to  
12 the EA and the MAC is the responsible governmental unit  
13 for the state EAW review process; therefore, this hearing  
14 is being sponsored jointly by the FAA and the MAC. Upon  
15 completion of the EA/EAW process and the environmental  
16 determinations, the proposed improvements will be  
17 scheduled accordingly in the MAC's Capital Improvement  
18 Program process.

19 Tonight your testimony on the information  
20 contained in the Draft EA/EAW will be recorded by a court  
21 reporter. If you would like to submit comments but do  
22 not care to speak this evening you may do so in writing.  
23 Comment forms are available at the welcome desk.  
24 Completed forms may be submitted this evening or via  
25 email to Chad Leque, Director of Environment,

1 Metropolitan Airports Commission, 6040-28th Avenue South,  
2 Minneapolis, Minnesota 55450, or by email to Chad Leqve,  
3 chad.leqve@mspmac.org.

4           Regardless of how comments are submitted, they  
5 must be submitted by the close of the comment period,  
6 which is 5:00 p.m. on April 19.

7           A speaker signup card must be completed in order  
8 to present oral comment at this hearing. Some of you may  
9 have already completed a speaker signup card at the  
10 welcome desk outside of the auditorium. If you would  
11 like to present oral comments but have not signed up,  
12 please raise your hand and a signup card will be  
13 delivered to you at your seat. You can do that during  
14 the course of the hearing if you would like. I will call  
15 upon the speakers who have signed up one by one to  
16 present their comments.

17           I respectfully request that you limit your  
18 statement to five minutes, and Mr. Leqve will be a  
19 timekeeper and give everyone a one-minute warning if you  
20 come up on the five-minute time frame. Although I don't  
21 want to restrict anyone's ability to present their  
22 comments, that will ensure that everyone wishing to speak  
23 has an opportunity to do so this evening. If you have  
24 additional comments following the five minutes, we  
25 request that you submit those comments in writing.

1           We will not be answering questions tonight and  
2 will not be taking any actions nor making any  
3 recommendations. All of the verbal and written comments  
4 will be taken into consideration before taking final  
5 action on the Draft EA/EAW at a future date.

6           Thanks for your cooperation. I will now open  
7 the hearing for public comment. I would first like to  
8 invite any public officials who wish to speak on the  
9 record to present their comments before we begin with the  
10 speaker signup cards.

11           I know there are two public officials that are  
12 present. Let me just see if, first, Dave Schultz from  
13 the West Lakeland Township Board would like to address  
14 the Commission?

15           MR. SCHULTZ: I'll pass.

16           CHAIR CRAMER: Pass. Okay. How about Ron  
17 Fredkove from the Baytown Township Board?

18           MR. FREDKOVE: Pass.

19           CHAIR CRAMER: Okay. Thank you, gentlemen,  
20 for being here and for your public service.

21           So let me go to the cards, and the microphone is  
22 right here in front. The first card is from Brad  
23 Cornell. Mr. Cornell, welcome.

24           MR. CORNELL: Good evening. First off,  
25 I've lived in West Lakeland for 31 years. I live right

1 off the end of the road, one way that's being proposed to  
2 be expanded, and on your first alternative for 30th **1A**  
3 realignment that road comes out -- would have come out at  
4 my driveway. And having been out here for 31 years and  
5 seen a number of these long-term comprehensive plans be  
6 proposed and just pushed towards our township saying this  
7 is what we're doing some day, and as you mapped out in  
8 the foyer, that's a 1965 plan, and in 1965 none of us **1B**  
9 lived out here, and I built in 1987, and my past, in my  
10 youth, was on the Civil Air Patrol, so I'm very  
11 well-familiar with aircraft and flight patterns and  
12 things like that.

13 And today I see a tremendous amount of traffic as  
14 a main corridor of 30th Street. That's 50 miles an hour  
15 today. I currently use it as my primary commute to work.  
16 And your choice at this time to continue a long-term  
17 comprehensive plan of a runway or an airport potential **1C**  
18 expansion to a now non-compatible long-term comprehensive  
19 plan, our own township, it seems to me this is backwards;  
20 that your comprehensive plan is not aligned with our **1D**  
21 township but you're proposing and pushing forward.

22 You've spent close to \$700,000 in this process **1E**  
23 since 2013. I asked for those documents last spring or  
24 last fall at one of your public comment areas. You  
25 generated those documents and provided it to me. This

1 report that was generated was estimated at \$400,000. So  
2 you've spent a significant amount of money on this  
3 long-term comprehensive plan, which means you're going to  
4 do it regardless what our township and the people sitting  
5 here in the room say and would like not to have happen,  
6 but it appears not to be very compatible with our  
7 township or the neighbors.

8 You say you've had communication with our  
9 neighbors. We've been here at all the meetings. We  
10 don't get our real voice heard. We get listened to and  
11 then brushed off, like the 30th realignment. This is  
12 very inconsiderate that you haven't listened to our  
13 township to say this is an incompatible long-term  
14 comprehensive plan. So that's my comments. I'll add  
15 further in writing.

16 CHAIR CRAMER: Thank you. Hold on just one  
17 second, Mr. Cornell.

18 Do you need any more information, Court Reporter?

19 COURT REPORTER: I would like people to say  
20 their name first and then spell the last name.

21 CHAIR CRAMER: Oh, I'm sorry, my fault.

22 MR. CORNELL: My name is Brad Cornell,  
23 C-O-R-N-E-L-L.

24 CHAIR CRAMER: Thank you, Mr. Cornell.

25 Next speaker is Mr. Krack. Mr. Krack.

1F



1 MR. KRACK: I would like to yield the floor  
2 to the next person. I would like to hear what other  
3 people have to say and I may have some comments at the  
4 end.

5 CHAIR CRAMER: We'll come back to you.  
6 Thank you. Joel Surgenor? Joel?

7 MS. SURGENOR: Jnel.

8 CHAIR CRAMER: Jnel. The light's a little  
9 shaky up here, I apologize.

10 MS. SURGENOR: Jnel Surgenor.

11 S-U-R-G-E-N-O-R. J-N-E-L.

12 So I live in Easton Village. We moved there last  
13 May, so coming up to a year. The main thing I have is  
14 the noise. It was stated in the presentation that the **2A**  
15 analysis is saying that there's not going to be much of  
16 an effect or minimal, but my question or my statement is  
17 you don't live in Easton Village so you don't know what  
18 that impact is going to be and there's no guarantee that  
19 you guys aren't going to increase your airplanes. You **2B**  
20 say not but, again, there's no guarantee. So that  
21 potential, you guys aren't going to -- the MAC is not  
22 going to give me new windows; we just built there less **2C**  
23 than a year ago. So those are my concerns. And then the  
24 removal of the land to expand the runway. **2D**

25 CHAIR CRAMER: Thank you very much.

1 Next card is from Anne Bucheck. Ms. Bucheck.

2 MS. BUCHECK: Hi. My name is Ann Bucheck,  
3 B-U-C-H-E-C-K, A-N-N.

4 Under Minnesota Statute 473.602, the MAC is  
5 vested with, among other things, "in part, to providing  
6 for the most economical and effective use of aeronautic  
7 facilities and services in that area."

8 It has been reported by the St. Paul Pioneer  
9 Press, the proposed 2040 Lake Elmo Comprehensive Plan and  
10 yourself that airport operations have plummeted over the **3A**

11 past decade. We, the majority, at every turn have  
12 continued to ask why you want to expand this airport. If  
13 not all airport operations are being used fully, then how  
14 can you possibly provide the most economical and **3B**

15 effective use of the taxpayers' monies by expanding the  
16 Lake Elmo Airport? It's time to turn your energies to  
17 learning how to fully utilize the ones you have.

18 I would encourage you to use the Holman Field. **3C**  
19 read the EAW and was pleased to learn about the Schmidt  
20 Brewing Company and agree that the airport may need new  
21 pavement and a connector road; however, I felt that there  
22 were mistakes and it was not complete in some respects.

23 One, how much income is derived from the 300.5 **3D**  
24 acres of leased agriculture land on the airport property?  
25 Will this income be forever lost for the taxpayers of

1 this state if you go ahead with your plan?

2 Second, your report states peak traffic  
3 drive times from Lake Elmo Airport to all nine airports  
4 are 30 minutes or greater. However, according to the  
5 St. Paul Pioneer Press, it took a West Lakeland resident  
6 18 minutes to get to the Holman Field Airport and 23  
7 minutes to get to the New Richmond Regional Airport from  
8 the Lake Elmo Airport. According to the table that's  
9 listed in the EAW, it also stated it could take up to 55  
10 minutes with traffic to reach the Minneapolis/St. Paul  
11 main terminal. I have lived within five to ten minutes  
12 of the Lake Elmo Airport for 40 years. It has never  
13 taken me, in those 40 years, 55 minutes under the  
14 absolute worst traffic conditions to reach that airport.  
15 I would like to know how were these described times  
16 determined?

**3E**

17 When discussing the Lake Elmo Airport you speak  
18 of the zoning. However, directly across the street to  
19 the west of the airport and within view are 469 built or  
20 approved-for-construction homes that are or will be homes  
21 to approximately 1,157 people that should feel safe in  
22 their homes. A woman that just spoke is one of those.  
23 These people will live in Easton Village, Village  
24 Preserve, Village Park Preserve and Heritage Farms.

**3F**

25 You discussed the wildlife strikes but no

1 mentions of the airplane crashes. Since we have -- since  
2 I personally have been witness to three crashes, one on **3G**  
3 Legion and 24th, which is right down the street from me,  
4 one on Lake Elmo Avenue and another on 10th Street, I  
5 think this needs to be addressed. If we have an expanded  
6 airport, will we see more crashes? Will they be human  
7 strikes? Is there a potential disproportionate health or  
8 safety risk to children?

9           And I might add when I walked in tonight, a  
10 neighbor who lives close to the airport said I was way  
11 off by the crashes and he would like to know how many  
12 crashes has there been. He knows of ones that are right  
13 on the airport.

14           Your report also stated, "No significant man-made  
15 wildlife attractants are located within one mile of the **3H**  
16 Airport." What about the holding ponds that some could  
17 call "significant man-made wildlife attractants" that  
18 have been made and are being constructed for Easton  
19 Village -- the woman who just spoke lives there -- and  
20 Village Park Preserve directly to the west of the  
21 airport? The airport should be concerned for the safety  
22 of the pilots as these will attract geese and other  
23 wildlife strikes.

24           In October of 2017, your wildlife observers  
25 witnessed over 400 Canada geese continuous morning

1 flights traveling south to north. With continued  
2 ponding, will there also be possible causes for crashes?  
3 Loss of life?

4 CHAIR CRAMER: Ms. Bucheck, we're about at  
5 the one-minute mark. Will you wrap it up? Thank you.

6 MS. BUCHECK: Okay. We all remember  
7 American Airlines' Captain Sully who had to land on the  
8 Hudson River. I was also going to talk about the lakes  
9 and how you're off; the St. Croix River is not 200 miles **3I**  
10 long; and I was also going to be talking about the tree  
11 removal you have in relation to the amount of lights that  
12 are going to be used, which is unfortunate.

13 And, finally, I, along with the majority, wish to  
14 reinstate my objection to your plans and ask that you  
15 tend to the business of providing for the most economical **3J**  
16 and effective use of aeronautical facilities by fully  
17 utilizing the ones you have. You may even wish to  
18 collaborate with the New Richmond Wisconsin Airport. **3K**  
19 Thank you.

20 CHAIR CRAMER: Thank you. We welcome those  
21 detailed remarks if you would like to submit them.

22 (Applause.)

23 CHAIR CRAMER: The next person is Fred  
24 Brandt. Mr. Brandt?

25 MR. BRANDT: It's B-R-A-N-D-T. In the



1 interests of efficiency, I would like to read my  
2 comments. These comments relate to how this runway  
3 extension is marketed to the public within the  
4 constraints of operating larger twin engine and  
5 single-engine aircraft and their respective all-weather  
6 performance engineering and certification limitations.

7 Specifically, the impact of the following:  
8 Outside air temperature, altimeter settings and headwind  
9 components; an operational maximum tailwind component of  
10 10 knots; runway contaminants such as ice, wet snow, dry  
11 snow, slush, standing water or any combination thereof;  
12 runway braking action reports; runway sloping, if any;  
13 bird strikes; airport de-icing capabilities and fluid  
14 recovery procedures; accelerate stop distances and  
15 balanced field length requirements to include a possible  
16 stopway; second segment climb profiles after engine  
17 failure over congested housing areas; and the associated  
18 noise abatement impact in the respective climb corridor.

19 In many, and possibly most cases, a 3,500-foot  
20 runway would significantly limit the performance  
21 engineering capabilities of such an aircraft relative to  
22 a max gross weight take-off or max landing weight  
23 landing. Consequently, the only way to operate within  
24 the entire performance envelope of all of the above  
25 limitations would be significantly reduced weights, be it

**4A**

1 via reductions in passengers, cargo, fuel or any  
2 combination thereof.

3 That being the case, it may be deemed  
4 unprofitable for such aircraft to consistently operate  
5 out of Lake Elmo and only do so on a limited basis and  
6 within the constraints of these performance degradations.

7 In conclusion, these comments only relate to  
8 aircraft capabilities and within the parameters of  
9 aircraft certification. They do not give any  
10 consideration to pilot judgment or any implication of  
11 operating in violation of FAR 91.13 as it relates to  
12 careless or reckless operations.

13 CHAIR CRAMER: Thank you, sir. If the last  
14 two speakers would be willing to submit their written  
15 comments to the court reporter? That would be helpful in  
16 creating a full record if you're willing to do that.

17 Okay. The next card is from Troy Wenck.

18 MR. WENCK: Thank you. My name is Troy  
19 Wenck, W-E-N-C-K. I'm a resident of Woodbury. I'm a  
20 business owner here in the Twin Cities metro area. I'm a  
21 pilot, hopefully a safe pilot. I use the airport. I use  
22 the airport for business travel and for pleasure. I want  
23 to thank MAC, the Commissioners, the Committee for your  
24 hard work on this report and this process. **5A**

25 MAC's charter is to promote regional -- promote

1 air transportation and commerce for the seven-county  
2 regional area, and I appreciate you being true to that in  
3 this process and looking at this airport as one of the  
4 seven airports in your charter and how it can support the  
5 successful operation of airports as a whole.

6 As I read the report, it appears that the  
7 proposed improvements are within all of the existing **5B**  
8 environmental policies. It appears that all the  
9 environmental consequences of the expansion are either  
10 not applicable, like the coastal regulations, or they're  
11 negligible, or they can and have a plan to be mitigated,  
12 so I fully support the expansion plan moving forward.

13 Now as it relates to my neighbors who are opposed  
14 to the project, I understand their opposition. I've **5C**  
15 heard a couple comments about how long folks have lived  
16 here. I'd like to note that the airport has been in Lake  
17 Elmo for something like 70 years, since World War II.

18 And I would also like to note that the room, when I  
19 walked in, had 163 people sitting in the auditorium and  
20 the population of the township and the town of Lake Elmo  
21 is about 11,000 people. So when folks talk about a **5D**

22 majority opposed to the expansion, the number of people  
23 who chose to show up tonight to voice their concerns  
24 represents just over 1 percent of the people in the  
25 immediate vicinity and a small fraction of the percentage

1 of the residents of Washington County.

2 Thank you for your work.

3 CHAIR CRAMER: Thank you for your comments.

4 The next speaker card is from Barry Rosell.

5 MR. ROSELL: Hi. My name is Barry Rosell,  
6 R-O-S-E-L-L, and I happen to live on 27th Street, so my  
7 house is in all of your maps. Everybody can look at my  
8 yard if you'd like, as opposed to the previous speaker  
9 who lives in Woodbury. I'm glad you enjoy flying your  
10 airplane over my house.

11 But what I would like to reference, as someone  
12 else mentioned this same article I think, but it's the  
13 Pioneer Press just a week or so ago, March 31st, about **6A**  
14 Holman Field. It says, "Overall operation counts from  
15 all sources at the airport dipped from 118,000 in 2007 to  
16 40,500 in 2017." This is at Holman. I'll skip much of  
17 the rest.

18 It says MSP went from 453,000 to 416 in the same  
19 time frame. Flying Cloud went from 118,000 to 91,000.  
20 The worst decline behind St. Paul was Crystal's airport  
21 where flights dipped from 54,000 to 34,000. Why the  
22 decline -- and again I'll skip some of the information --  
23 but it says, "Where back in the 1980s it was  
24 predominately recreational flying and flight training  
25 where corporate flights made up about 30 percent of

1 operations, now between 80 and 90 percent of the flights  
2 are corporate and 'corporate flights have drastically  
3 decreased over the past decade,' MAC officials said."

4 So my comment is beyond restoration of obviously  
5 current runway surfaces, adding safety features for the  
6 pilots such as instrumentation and lighting. I don't  
7 understand why MAC would continue to force this -- excuse  
8 the phrase -- but down our throats and spend the money,  
9 our tax dollars, for the potential for larger and more  
10 aircraft here when the current MAC resources are so  
11 underutilized. As an engineer, that does not make sense  
12 to me.

**6B**

**6C**

**6D**

13 And, secondly, as a 20-year resident who does  
14 recall when some Beechcraft Air Kings used to try to fly  
15 in and literally rattled the windows on a house, I mean  
16 it was -- we love the airport, I'll say that. We built  
17 here, the airport was here and we love it in its current  
18 state, no problems with that. But when those big planes  
19 fly in, it literally -- the brand-new house, windows  
20 rattle, it's like what in the world is going on. It  
21 didn't happen very often.

**6E**

22 So I also take issue with the comments over  
23 "every three years," or however often we've come down  
24 here and to listen to this. And one time I cornered one  
25 of your engineers out at the water fountain and we talked



1 and I asked about all of this noise mitigation and all  
2 these things that they were going to do and the things  
3 that were listed again here, and I said, "How are you  
4 going to enforce that?" And he kind of looked away and  
5 he wouldn't look me in the eyes and he says, "Well, we **6F**  
6 can't really enforce any of it; it's unenforceable."

7 So I guess I'll end with this. If you can force  
8 this airport on us and you can say how many people show  
9 up here, well, I think a lot of us have just given up. **6G**  
10 It's like you're going to do it anyway. But if you can  
11 force this airport on us, why the heck can't you force  
12 pilots and the airport and some type of management system  
13 of the noise that is going to come. And I will -- I  
14 guess I'll end with that. Thank you.

15 CHAIR CRAMER: Thank you for your comments.  
16 Next speaker card is from John Renwick. Mr. Renwick.

17 MR. RENWICK: John Renwick. John with an  
18 H, R-E-N-W-I-C-K. I'm in support of the plan. I'm an **7A**  
19 airport user.

20 People have called this an airport expansion. It  
21 is not. It's being done within the boundaries of  
22 existing MAC property. There's no plan for any more **7B**  
23 buildings, there's no plan for any additional capacity to  
24 house aircraft. We're maxed out as it is, so this isn't  
25 going to mean any new aircraft moving into Lake Elmo.

1 The only thing that's increasing is the runway lengths,  
2 and the only reason to do that is for enhanced safety for  
3 pilots and neighbors, so it's not an expansion, it's an  
4 improvement.

5 And to the comment from Easton Village, I would  
6 say that it's actually going to help them because it  
7 moves the main runway several hundred feet to the  
8 northeast, which is going to reduce the amount of noise  
9 they experience over there, and that's my comment. Thank  
10 you.

7C

11 CHAIR CRAMER: Thank you, sir.

12 The next card is Mike Graczyk. I'm sorry, I may  
13 have mispronounced that name.

14 MR. GRAYSON: It's Mike Graczyk, and I  
15 would like to come back for more comment.

16 CHAIR CRAMER: Okay. Mr. Krack, you're up  
17 unless there have been some other cards submitted? Oh,  
18 got a few. Mr. Krack, do you want to go now or --

19 MR. KRACK: I'll wait.

20 CHAIR CRAMER: While we're waiting for the  
21 cards, I neglected to introduce our attorney, Evan  
22 Wilson, who is here to keep us on the straight and  
23 narrow, so I thank you for being here.

24 Mark Wendorf.

25 MR. WENDORF: Good evening. Mark Wendorf,

1 W-E-N-D-O-R F. I'm from Baytown Township. I'm just off  
2 the runway going to the north of the airport and I've got  
3 a few comments here.

4 I understand from reports that I've read that one  
5 of the main purposes of this proposed expansion is to **8A**  
6 benefit private corporations by allowing bigger and  
7 heavier planes. And let's not kid ourselves, at some  
8 point this is going to expand even more, it's going to be  
9 jets, but, whatever. Now this is despite reports that **8B**  
10 there are two existing airports; one 16 nautical miles to  
11 the northeast and one nine nautical miles to the  
12 southwest. In other words, we're right in between; both  
13 of which one could drive to in less than 30 minutes,  
14 substantially less than 30 minutes, and both of which are  
15 currently fully capable of providing all of the services **8C**  
16 to private corporations that this airport now wants to  
17 expand to create.

18 As to the New Richmond Airport, the reports I've  
19 seen say congressional representatives in Wisconsin are **8D**  
20 fairly begging the FAA to divert funds there so they can  
21 improve the airport that they have; that it's already  
22 capable of servicing the planes that Lake Elmo is wishing  
23 to bring in here. And as to the Holman Field, as **8E**  
24 somebody mentioned, it's dramatically underused right now  
25 as the other MAC airports are as well.

1 But my question is not about the -- or my comment  
2 is not about the total lack of need for this boondoggle,  
3 my question is this: According to the proposal, and to  
4 facilitate these private corporations being able to fly  
5 in and out of here, they'll be flying bigger and heavier **8F**  
6 airplanes that will obviously be much louder. The  
7 extended runways -- and you're talking about cutting down  
8 some of my trees, one of which presumably you're looking **8G**  
9 at is an over-300-year-old white oak that's been here  
10 long before the Revolution and it's worth a hell of a --  
11 heck of a lot of money. Excuse me.

12 Now you're going to extend the runways so that  
13 these airplanes are undoubtedly going to be buzzing our **8H**  
14 houses at lower -- and properties at lower levels than  
15 they have before. Not only that, you're going to light **8I**  
16 up a runway so that instead of having roughly 12 hours or  
17 less a day, now it's going to be more than that; now it's  
18 going to go into the evening and it's going to ruin our  
19 evenings.

20 My point is this, so the question is this: As  
21 the MAC reps know here, of course, Section 13 of the  
22 Minnesota Constitution requires that before you take any  
23 action you must make sure that you can provide -- "that  
24 private property shall not be taken, destroyed or damaged  
25 without just compensation thereof first paid and

1 secured." [As read.]

2 So my question is this: How much of this \$13.5  
3 million budget has been set aside to compensate the many  
4 homeowners for the increased air pollution, noise, loss  
5 of peace and quiet and loss of property values that will  
6 inevitably result, not to mention substantial legal costs  
7 that the MAC is going to have to incur in defending these  
8 things.

**8J**

9 Now there's been a couple comments about, you  
10 know, my house has been there -- my house was built where  
11 it is now; it was built in the 1880s. I've been here for  
12 almost 30 years. And what we're talking about here, as I  
13 understand it, and I'll be corrected -- if I can be  
14 corrected, I'll be happy to be corrected -- but my  
15 understanding is this is not just a repair, this is a  
16 substantial change in the current airport and it's going  
17 to cost money. It's going to cost us money or it's going  
18 to cost you money, and so my point is has that been  
19 budgeted for? Has that been looked at?

20 If you want to take away my tree that's over 300  
21 years old, we're going to be talking about that, and I'm  
22 sure there's a lot of other people out here that are  
23 going to be talking about the loss to their property  
24 values, the loss to their use and enjoyment of their  
25 property that has to be compensated under the Minnesota

**8K**



1 Constitution and Minnesota case law, several cases that  
2 you no doubt know that will support that.

3 With that, thank you.

4 CHAIR CRAMER: Thank you, sir, for your  
5 comment.

6 Next speaker card is from Rob Creibich. Probably  
7 got that name wrong. Sorry, Rob.

8 MR. CREIBICH: Close enough. My name is  
9 Rob Creibich, C-R-E-I-B-I-C-H, and I'm probably the only  
10 one speaking tonight from the other side of the river,  
11 from New Richmond, Wisconsin, so I've heard our community  
12 mentioned here. And I just want to go on the record to  
13 basically say that we think this project is totally  
14 unnecessary and a duplication of services that exist 35  
15 minutes from here.

**9A**

16 We've got the second-busiest general aviation  
17 airport in Wisconsin, and when you talk about the decline  
18 in business in Minnesota, there's good reason for that.  
19 It is much cheaper to register a plane, to house a plane  
20 and to fuel a plane in Wisconsin. For the Super Bowl we  
21 had 40 corporate aircraft that landed at the New Richmond  
22 Airport, including Terry Bradshaw, Sheryl Crow and Jimmy  
23 Fallon. We routinely get the governor of the state to  
24 land there.

**9B**

25 And when you talk about federal tax dollars, \$11

1 million, we need 2 or \$3 million to extend sewer and  
2 water to further expand the seven businesses there and  
3 the 200 aircraft that are currently stored there.

**9C**

4 So we think you should listen to the people, the  
5 will of the people here, and look regionally beyond the  
6 borders of Minnesota to see that the logical solution  
7 here is not to wreak havoc on the environment, to go  
8 against the will of so many citizens here, and I've  
9 attended previous hearings, and to do the right thing for  
10 federal taxpayers, and that is to reallocate these  
11 dollars to New Richmond and not duplicate the service  
12 there.

**9D**

**9E**

13 So I'm working with the federal officials, U.S.  
14 Senator Ron Johnson, Congressman Sean Duffy, U.S.

15 Senator Tammy Baldwin. We are going to fight you for  
16 these \$11 million that we think can be better spent at an  
17 existing state-of-the-art airport just 35 minutes away.

**9F**

18 We had 20 top state officials in New Richmond  
19 just several weeks ago. We're looking to do a pilot  
20 training facility there given the looming shortage of  
21 pilots. We just -- we hate to butt into other people's  
22 business but, again, this is federal tax dollars so we  
23 think we have a right to vie for those dollars.

**9G**

24 Thank you very much.

25 CHAIR CRAMER: You're welcome. Thank you.

1 (Applause.)

2 CHAIR CRAMER: Okay. The next card is from  
3 Molly Olson. Ms. Olson?

4 (Applause.)

5 MS. OLSON: My name is Molly, M-O-L-L-Y,  
6 Olson, O-L-S-O-N. I live in West Lakeland Township. I'm  
7 fairly new to the community, about a year and a half.  
8 Just as I bought my lot I realized what was happening  
9 shortly after that with the airport expansion, even  
10 though I had learned prior to that that it was just a  
11 small, very small, tiny, micro planes, whatever you call **10A**  
12 them, recreational airplanes that just flew for fun, for  
13 hobby, and that's all it was and that it would never be  
14 more than that. I did due diligence. I didn't even  
15 start to build my home until one year after the lot was  
16 bought because I wanted to know what was going on. I  
17 didn't have to build in this area.

18 But because of the things that I heard and  
19 because of the things that I see, it seemed obvious that  
20 of course the airport wouldn't be expanded. Look around,  
21 look at the area. We all know and have heard tonight  
22 that the plan was created in 1965 when the community **10B**  
23 looked extremely different. And I mean for the sake of  
24 the record, I hope FAA people are reading my testimony  
25 some day in the future to say, please, come out here,

1 look, look around the airport and see what this will do  
2 to the residents in this area and the land and the  
3 community, especially with all of the variable things **10C**  
4 that were added on the very tail end of the environmental  
5 study by Evan's presentation. The very last document  
6 were "other cumulative things" going on, or whatever that  
7 was, which I think was almost like the first time I had  
8 heard that on one of the reports. But there are so many,  
9 many other things that are going on that are being  
10 ignored.

11 The other thing I hope FAA is reading this  
12 document, and this testimony, too, because we know in the  
13 community that the airplane counts that you have and the  
14 flight counts that you have in your documents are **10D**  
15 completely not true. Completely not true. Those of us  
16 who live in the area, we hear, we know the number of  
17 flights that are landing and the number of -- the amount  
18 of traffic that's in the air, and it's completely  
19 impossible that there is that many flights taking on and  
20 off with the numbers that you have. So I believe, and  
21 many of us in the community believe that the numbers are  
22 incorrect, they've been fudged, and that if the reality  
23 and the truth of the numbers were provided to the FAA,  
24 this airport wouldn't even qualify for the funding.

25 And again, the noise. Of course -- thank you

1 everybody who has spoken tonight about the noise -- of  
2 course there will be excess noise.

**10E**

3 And in addition to that, I appreciate the process  
4 that you've allowed us to actually say something, but as  
5 others have said tonight, that nothing that we have to  
6 say about the opposition of this matters at all, and that  
7 is completely why people -- more people than this don't  
8 show up.

**10F**

9 And the other thing is people want to be able to  
10 trust their government. They think the government -- too  
11 many people think the government is there working to help  
12 us and do the right thing for us and to protect us but  
13 it's not. Government is just there to build more  
14 government and more bureaucracy and it's so evident by  
15 what you're doing by wasting all this money. The people  
16 that are not here are probably likely a lot of those from  
17 that group that trust their government to do the right  
18 thing or have given up, one of the two.

**10G**

19 You know, we -- finally we see an overhead with a  
20 more thorough documentation of some of the concerns that  
21 we've had, but for meeting after meeting after meeting  
22 our concerns were completely ignored. What were some of  
23 the things that were not even on there? There is -- we  
24 have complained about this at other meetings when you  
25 talk about the purpose and the need. Well, it's the

**10H**



1 purpose and the need for, for MAC; it's not the purpose **10I**  
2 and the need for the community or the airport itself. It  
3 doesn't need it. It's small hobby farms -- planes,  
4 excuse me -- small hobby planes, and we're spending, what  
5 was it, \$14 million to help satisfy the hobby for a lot **10J**  
6 of people?

7 And we know that there's a private school over  
8 there, too, that people are learning, so we're paying all  
9 these taxpayer dollars for a private school? And how **10K**  
10 much of that private school is the number of the flights  
11 that go up and down, the takeoffs and landings?

12 CHAIR CRAMER: Ms. Olson, the one-minute  
13 mark if you could wrap it up.

14 MS. OLSON: I'll wrap it up and just say it  
15 is incomprehensible that this volume of dollars would be **10L**  
16 spent for a project that is so unnecessary. And that  
17 30th? I would think the FAA would look at that curvature  
18 in the road that you've created on 30th and hopefully **10M**  
19 somebody will look at that and say they can see on the  
20 piece of paper that is absolutely ridiculous.

21 CHAIR CRAMER: Thank you.

22 (Applause.)

23 CHAIR CRAMER: Next card is from Patrick  
24 Fleming. Mr. Fleming?

25 MR. FLEMING: My name is Patrick Fleming,

1 spelled F-L-E-M-I-N-G. I live in Lake Elmo, I fly out of  
2 Lake Elmo Airport.

3 I fly almost exclusively for personal  
4 transportation. I fly a Cherokee 6. When I'm traveling,  
5 I do not land at airports with less than 3,000 feet of **11A**  
6 runway. If it's a hot day I won't land at less than  
7 3,500 feet of runway. I make an exception at Lake Elmo  
8 Airport because I know the airport so well. But I cannot  
9 fill that airplane with my family and fuel and take off  
10 on a hot day and feel safe. I have to make alternative  
11 arrangements, which are little cumbersome.

12 I appreciate your work on this and I look forward  
13 to a 3,500-foot runway. Thank you.

14 CHAIR COMMENTS: Thank you for your  
15 comments. I think we have a few more cards before we  
16 have Mr. Krack and Mr. Graczyk arm wrestle for who goes  
17 last.

18 MR. KRACK: Mr. Graczyk can go first.

19 CHAIR CRAMER: Susan Dunn. Susan Dunn?

20 Mark Montanari?

21 MS. DUNN: She's getting me the microphone.

22 CHAIR CRAMER: Sorry, I apologize. We'll  
23 go back to Ms. Dunn.

24 STAFF: Do we have a cordless mic? No?

25 CHAIR CRAMER: Do you have some written

1 comments you can submit?

2 MS. DUNN: I do. I think I'll go ahead and  
3 write them. But I do have to say that I'm from Lake  
4 Elmo, Minnesota and I'm pushing 80, and I've been down at  
5 these meetings for as long as these people have been  
6 alive.

7 Lake Elmo Airport has always been an integral  
8 part of the area and has been enjoyed by a lot of people,  
9 and I will do written comments.

10 CHAIR CRAMER: Okay.

11 MS. DUNN: But I do have some real  
12 environmental concerns. We do have big issues in Lake  
13 Elmo and Washington County, and I do not -- I think we  
14 can preserve what we have. I do not think we need to  
15 expand anything, and if you have to do any further  
16 investigation, an EIS would be appropriate.

12A

17 CHAIR CRAMER: Okay. You certainly have  
18 some time to write your comments down and get them into  
19 the record, so thank you very much. I'm sorry we  
20 couldn't accommodate you with the setup tonight.

21 All right. Now Mr. Montanari.

22 MR. MONTANARI: Mark Montanari,  
23 M-O-N-T-A-N-A-R-I. My issue is with the noise, as some  
24 of the people brought up already, but it isn't really  
25 with the airplanes flying over.

1           When I moved into the area here 25 years or so  
2 ago, the north end of the airport didn't have the  
3 commercial buildings over there. Since then, traffic has  
4 picked up obviously. But, frankly, I would like to see  
5 MAC try to curb some of the time issues when some of  
6 these planes can take off. Now maybe you can go do it,  
7 maybe you can't. Obviously they're privately owned  
8 businesses. But I'm getting tired of hearing the same  
9 plane Monday through Friday at 5:00 in the morning and  
10 having it out there warming up for 15 minutes and then  
11 listen to them take off. And so if something could be  
12 done about the noise in that respect, I know it's  
13 different than being in the air flying over, but still if  
14 it gets bigger out there, maybe it's not expanding as you  
15 say, something -- I would like to see something done with  
16 the noise. And if it starts at 5 in the morning, who  
17 knows, maybe it will be going at 10, 11:00 at night, too,  
18 depending on what their business operation is over there.  
19 That's all I've got to say.

20           CHAIR CRAMER: Thank you, sir. Any other  
21 cards? All right. Mike Seeber.

22           MR. SEEBER: That's me, S-E-E-B -E-R. I  
23 live on Neal Avenue, and I have been to a number of these  
24 meetings. I'm opposed to the project. A couple of you  
25 probably know me or maybe you don't recognize me.

**13A**

**14A**

1           We have spoken against the project. It seems **14B**  
2 unnecessary. I don't feel like the MAC has been honest  
3 with us in many respects, and we've had several that have  
4 testified to that tonight. There's -- you don't give me,  
5 I'll speak for myself, the impression of a trustworthy **14C**  
6 partner in this process. You give me the impression of a  
7 bully that just wants to have your way. You go through a  
8 process -- this is my feelings on it, I'll speak for  
9 myself again. You go through this process, you ask us  
10 for comments, but then those comments -- then you say  
11 you're listening but the comments are not integrated. **14D**  
12 And I think what this all boils down to, I'll have to be  
13 honest, I don't care a lot for the MAC. I don't mind the  
14 airport being here and I'd be fine with repaving the **14E**  
15 runway as it is, keep it existing, but I'm not a fan of  
16 the MAC or the Metropolitan Council, to be honest.

17           Anybody who pays attention to these issues has **14F**  
18 seen many times that your agency and your parent agency  
19 throw their weight around a lot and they seem to trample  
20 people's rights, and I don't appreciate that. And every  
21 since I was a little kid I fought bullies, and this seems  
22 a lot like when I was on the playground as a  
23 six-year-old -- sixth-grade kid.

24           The process has not seemed honest or fair, and I  
25 think the very bottom -- and I came in a little bit late,



1 so forgive me if somebody else has said this. It seems  
2 to me the bottom line of this whole thing is that you  
3 want the federal money to repave your runway and the only  
4 way that you can get the federal money is to enlarge the  
5 runway. Or we had a gentleman that said this is not an  
6 expansion. Making a runway longer is not an expansion, I  
7 guess. So lengthening the runway is a requirement to get  
8 the federal money and I think that's what this all boils  
9 down to. And the gentleman from Wisconsin, the airport  
10 manager or -- I don't know what his title is.

**14G**

11 MR. CREIBICH: Chamber.

12 MR. SEEBER: Chamber, thank you. I  
13 appreciated your comments.

14 -- said that he called this money tax dollars.  
15 I've challenged that before in a meeting and I don't know  
16 who is right. Because the MAC has told me in personal  
17 conversations that these aren't tax dollars, that  
18 they're -- so you say they're not; he says there is.  
19 Maybe the truth is in the middle, but it is public money.  
20 So there should be -- the prospect or the process, it  
21 just does not seem fair.

**14H**

**14I**

22 And at a number of points along the way the  
23 information that we've been given has not been correct,  
24 and some have testified that they have confidence in what  
25 you've done. I've been here. I haven't seen Mr. Wenck

**14J**

1 here before. Maybe he's been here before, maybe he  
2 hasn't. He has confidence. I don't. I've not been  
3 satisfied in any way. These meetings are show and it  
4 feels like you folks just want to have your way. So  
5 that's, that's my testimony.

6 CHAIR CRAMER: Okay. Great. Thank you,  
7 sir.

8 MR. SEEBER: Yep. Thank you.

9 CHAIR CRAMER: All right. Mr. Graczyk.

10 MR. GRACZYK: My name is Mike Graczyk,  
11 G-R-A-C-Z-Y-K, and I'm from Lake Elmo. I'm a pilot and I  
12 own an airplane at Lake Elmo and I fly a lot and aviation  
13 has been my whole life, probably since I've been young  
14 and working on little motors at 12 or so.

15 Anyway, I hope I can trust the MAC to make the  
16 correct decision on the future use of the Lake Elmo  
17 Airport. It's been there for a very long time and the  
18 pilots there and the people I know there, and I've been  
19 there for a long time, too, are concerned about the **15A**  
20 community. And I don't believe that they're offensive  
21 neighbors and they keep noise down and they're looking to  
22 use their airplanes and enhance aviation, which is a very  
23 integral part of our society in a sense. Who hasn't  
24 flown? Who hasn't learned to fly? And that's a good  
25 place to learn to fly. It's a good place to keep your **15B**

1 plane also.

2 So as I say, I'm not totally prepared to make a  
3 comment here but I trust that you'll make the right  
4 decision as to the future of the Lake Elmo Airport and  
5 keep it as the Lake Elmo Airport, and that's really all I  
6 want to say about it right now. I think for the most  
7 part that has not been an offensive community, that is,  
8 the Lake Elmo Airport, to the surrounding area.

**15C**

9 You mentioned about some loud, lumbering,  
10 crash -- Beechcraft that crashed. That airplane was  
11 built in 1950-some. They don't operate them anymore,  
12 they don't make noise like that. New airplanes that  
13 replaced them are a lot quieter and a lot safer and  
14 they'll blend in with the neighbors a whole lot better.

**15D**

15 So with that, I trust you do the best you can and  
16 keep up the good work.

17 CHAIR CRAMER: Thanks for your comments.

18 And then the last card I have, although others  
19 can certainly speak still, Mr. Krack.

20 MR. KRACK: Thank you, Commissioner Cramer,  
21 MAC staff. My name is John Krack. That's J-O-H-N,  
22 K-R-A-C-K. I live in Fridley.

23 I've been a pilot for over 50 years, I've flown  
24 out of MAC airports for just about all of that time, and  
25 I'm also the Chair of the Reliever Airports Advisory

1 Council, which is a MAC-sanctioned advisory group made up  
2 of representatives from each of the airports, so I have  
3 an interest in all of the relievers, as well as Anoka,  
4 which I fly out of.

5 Well, I got an earful tonight. I do speak in  
6 favor of what MAC is trying to do, but I also have some  
7 sympathy with some of the comments that people have made.  
8 What I'm hearing is that the only solution, shall we say,  
9 that would satisfy most of the people in the room that  
10 are opposed to what MAC is doing is to leave the airport  
11 as it is or close the airport.

12 If we close the airport, we are now faced with  
13 having to compensate all of the people who have made **16A**  
14 large investments in the airport. I don't know where the  
15 money will come from, but I don't expect that they'll  
16 come from the MAC. As well, FAA has to be reimbursed  
17 because MAC has accepted money as part of the grant  
18 process. So I don't imagine that the township  
19 supervisors would be too happy having to tell their  
20 constituents that we have to raise your taxes to buy out  
21 the airport. I don't know if that's even feasible;  
22 however, that's my thinking.

23 The other solution is to just pave the runway as  
24 it is. Some of the concerns -- I guess the main concern  
25 I've heard is the rerouting of Highway 30, and I do know

1 that MAC has taken several stabs at trying to come up  
2 with a compromise to that. They've engaged with the  
3 Community Engagement Panel and they've ruled out the  
4 other approach that they had, which removed the double  
5 curve, so I don't see any other solution other than  
6 buying a lot of land.

**16B**

7 So I feel that MAC, in that case, has done a fair  
8 job of listening to constituents and coming up with a  
9 solution, given the other objectives that they're trying  
10 to achieve, so I think MAC has listened.

11 The process itself -- I follow this for Lake  
12 Elmo, for Crystal, and tangentially for Airlake -- this  
13 is by far and away the most transparent and the most  
14 thorough planning process that I've ever seen regarding  
15 long-term comp plans, and some of the other ones have  
16 been very -- almost this is what we want to do and, you  
17 know, we'll take some input but we ignore it.

**16C**

18 In this case, this input hasn't been ignored.  
19 They've made at least two revisions to the Lake Elmo  
20 plan, they've made several revisions to the Crystal plan,  
21 all based on constituent and stakeholder input. So I  
22 applaud that process, I applaud the dedication that MAC  
23 has taken and, yeah, it costs more money, \$700,000 for  
24 how many iterations on this thing. It would have been a  
25 lot cheaper if you had gone with the first one.



1 But at the end of the day MAC is tasked with, by  
2 the legislature, with managing these airports to the  
3 benefit of the transportation system, the benefit of the  
4 users, and to try to reach reasonable compromises with  
5 communities, and you have to make a decision, and I  
6 believe that the extension of the runway is a definite  
7 safety factor. You're able to do it without expanding **16D**  
8 the noise contours, you're able to keep the runway safety  
9 zones entirely within MAC property, and I think that's **16E**  
10 pretty good, pretty good results of -- if you reference  
11 to this.

12 Do we need 3,500 feet? As others have said, it  
13 is definitely a safety factor. Maybe on dry pavement on  
14 a medium-temperature summer day, 2,800 is fine. But you  
15 get a hot summer day with no wind, airplanes don't **16F**  
16 perform as well, they don't climb as well, it takes  
17 longer to get off the ground, or you have a rainy,  
18 slippery surface, it takes longer to land or you have a  
19 rusty pilot that floats halfway down the runway before he  
20 touches down, and that extra 6 or 700 feet can be the  
21 difference between someone running off the end and being  
22 able to get his aircraft stopped.

23 So I guess in closing I would say that I commend  
24 what MAC is doing. I think this is a situation where **16G**  
25 some -- we can't please everybody, and I think we've

1 entrusted MAC, the legislature has entrusted MAC with the  
2 operation of these airports and I support going forward  
3 with the plan. Thank you.

4 CHAIR CRAMER: Thank you. No more cards --  
5 (Applause.)

6 CHAIR CRAMER: -- but is there anyone else  
7 who would like to speak this evening?

8 (No response.)

9 CHAIR CRAMER: All right. Seeing no one,  
10 we have heard from all speakers who asked to make  
11 comments tonight. I will officially adjourn this public  
12 hearing, although again I would ask if Ms. Bucheck and  
13 Mr. Brandt would be willing to submit their written  
14 comments to the court reporter just to help us get the  
15 record exactly right.

16 As a reminder, additional written comments must  
17 be submitted by the close of the comment period, 5:00  
18 p.m., on April 19th, by mail to Chad Leqve, Director of  
19 Environment, Metropolitan Airports Commission, 6040-28th  
20 Avenue South, Minneapolis, Minnesota 55450, or by email  
21 to Chad Leqve, chad.leqve@mspmack.org.

22 Thank you all very much for coming tonight and  
23 participating in the environmental review process. This  
24 hearing is closed.

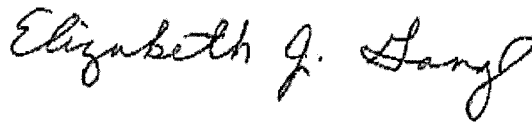
25 (Proceedings concluded at 8:05 p.m.)

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REPORTER'S CERTIFICATE

I, Elizabeth J. Gangl, a Registered Professional Reporter in the State of Minnesota, do hereby certify that the foregoing pages of typewritten material constitutes an accurate verbatim record transcribed from the stenotype notes taken by me of the proceedings aforementioned on the 4th day of April 2018, at the times and place specified.

DATED: April 8, 2018



Elizabeth J. Gangl  
Registered Professional Reporter



## Public Comment Form

Lake Elmo Airport Environmental Assessment

Public Hearing, Oak-Land Middle School Auditorium, April 4, 2018

**BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND  
MAY BE INCLUDED IN A PUBLIC DOCUMENT.**

Completed forms can be:

- 1) Left with us at the public hearing;
- 2) Sent via email to [ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org); or
- 3) Sent via mail to:

Lake Elmo Airports EA/EAW  
c/o MAC Environment Development  
6040 28th Avenue South  
Minneapolis, MN 55450

Written comments will be accepted until Thursday, April 19, 2018 at 5:00 PM. All written comments received during the comment period will become part of the project record.

Name:

Susan Dunn

Address:

11018 Upper 33<sup>rd</sup> St. No. Lake Elmo

- 17A** Preserve + maintain current use + configuration of Lake Elmo Airport
- 17B** Funds to New Richmond airport 11.5 million
- 17C** City Comprehensive Plan of Lake Elmo had safety zones that were recently eliminated to aid the developments like Eastern Village + other developments in surrounding areas.
- 17D** MAC asked Lake Elmo not to have high density development near the airport - But MAC was ignored + Lake Elmo did what they wanted for the developer.
- 17E** # of aircraft at Lake Elmo airport continues to decrease to 183, +
- 17F** Do not fill in wetlands they recharge the aquifers.
- 17G** Disrupting + removing the woodlands is yet another assault on the environment, NOISE very disruptive.
- 17H** Road reclamation not
- 17I** How can wetlands be moved to another area of the state + still be beneficial to Washington County?

Please use the back side of this form for additional comments.

More information about the plan can be found at: [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx)

- 17J** A full EIS must be done if residents ignored  
I support our airport + do not want it to close



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Name:

SCOTT O'CONNOR

Address:

11 PENINSULA ROAD WBL MN 55110

**18A** As a pilot and a tenant longer owner at Z1D, I  
am firmly in support of the Z1D improvement plan.

Most important is the increased safety this will  
provide to pilots and neighbors.

As a result of the improvement I do not plan  
to fly "more" from Z1D, but I will be able to  
fly "more safely".

**18B** Z1D serves an important role in the east metro,  
and in the MAC reliever airport system. It  
is advantageous to everyone to make it as safe  
as possible.

Signed S. O'Connor

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Name: Janel Surgenor

Address: 11725 32nd St. N, Lake Elmo

- 19A** I object to the proposal. I live in Easton Village and the noise  
**19B** currently is unbearable. With the expansion, there will be more  
planes and more noise. The <sup>MAC</sup> ~~airport~~ states the noise will be **19C**  
minimal. However, MAC, FAA, and the pilots don't live in Easton  
Village and will not have to live with the noise. I highly doubt  
**19D** the MAC will fund the surrounding neighborhoods with new  
noise reduction windows. I believe MAC is lying about the **19E**  
fact that there will not be bigger planes. I am also concerned  
**19F** about the loss of land, trees, and water areas. I feel the neighbors **19G**  
close to 30th Street will have the new road and expansion in their  
backyard. Lastly, I am concerned with the safety of me and family.  
**19H** There is a potential of a plane crash in my neighborhood, an increase of  
traffic on Manning Ave that would cause traffic accidents and **19I**  
car-pedestrian accidents.

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Minneapolis, MN 55450

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Name:

JOHN A. REGENOLD

Address:

1484 EAST SHORE DRIVE  
ST. PAUL MN. 55106

20A

I was at the April 4, 2018 hearing and totally agree with the improvements for Lake Elmo airport. Longer runways - better lighting etc. I also own a hangar at Lake Elmo and fly from that airport on a regular basis.

Thank You  
*John A. Regenold*

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Minneapolis, MN 55450

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Name: RAYMOND LUCKSINGER

Address: 12725 5<sup>th</sup> ST No LAKE ELMO, MN 55042

I have LIVED all my LIFE <sup>75YRS</sup> at THIS address  
TOOK FLYING LESSONS AT THE AIRPORT BACK  
IN THE 50'S WAS A MEMBER OF THE  
21A CIVIL AIR PATROL and THE COMMERCIAL AIR FORCE  
at FLEMING FIELD I believe MAC IS DOING  
a VERY good job at RUNNING THE AIRPORTS  
21B and am FOR THE PREFERRED ALTERNATIVE PLAN

PEOPLE SAY IT WILL DEVALUE HOMES, IF THIS  
IS TRUE (WHY) ARE THEY BUILDING HOMES NEXT  
TO THE AIRPORT SELLING FOR 350,000 TO 400,000  
21C AND THEY ARE SELLING, IF PEOPLE DON'T  
LIKE AIRPORT (WHY) ARE THEY BUYING THEN

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Name: Susan Packgraf

Address: 12775- 5<sup>th</sup> ST. N. Lake Elmo, MN

**22A**

I've lived in Lake Elmo all my life, I enjoy seeing the planes, we stop over and watch the plane take off and land. MOC is doing a good job taking care of the air ports. I'd like to see the money stay here in Lake Elmo air port, and not in Minn's

Please use the back side of this form for additional comments.

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Mr. Andrew Peek  
Federal Aviation Administration  
6020 28<sup>th</sup> avenue, South, Room 102  
Minneapolis, MN 55450

Dear Mr. Peek,

Please accept this letter as a vote to NOT allow the expansion of the Lake Elmo Airport.

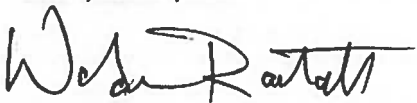
My reasoning:

- 23A** | 1) MACs proposal for airport expansion includes either a shutting down or a major rerouting of 30th street between Manning and Neal Ave. Proposed road will go from 55 MPH to 30 MPH, slowing commutes and possible access for emergency services. It may also force daily commuter traffic through my neighborhood.
- 23B** | 2) Potential for ground water contamination in our wells, due to disruption of current watershed.  
3) 20 acres of trees and natural habitat, which now protect residents from wind, light and noise pollution will be removed and replaced with extended, lighted runways which will be lit 24 hours a day, 7 days a week with the addition of added strobes to the crosswinds.
- 23D** | 4) Extended runways are being proposed without zoning, which puts pilots and residents at risk.  
5) Extended runway will cost \$11.5 million and is not warranted given current usage of the airport; operations, based aircraft, and continuing decline of pilots. Downtown St. Paul and New Richmond should be considered as alternatives.
- 23F** |
- 23G** | 6) Longer runways mean larger/noisier planes. I already have planes flying low over my house, I don't want more.
- 23H** | 7) I moved to this area from Woodbury and paid more for my home and lot so I could get more privacy and a country environment. I pay over \$6K/year in property taxes for this attribute and do not wish to see the area deteriorate any further.

**23C**

**23E**

Thank you for your time.



Wade Rastall  
2403 Northridge Avenue Court North  
West Lakeland, MN 55082

FAA - DMA ADO  
MINNEAPOLIS

APR 5 2018

RECEIVED





**Public Comment Form**  
**Lake Elmo Airport Environmental Assessment**  
 Public Hearing, Oak-Land Middle School Auditorium, April 4, 2018

**BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND  
 MAY BE INCLUDED IN A PUBLIC DOCUMENT.**

Completed forms can be:

- 1] Left with us at the public hearing;
- 2] Sent via email to [ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org); or
- 3] Sent via mail to:

Lake Elmo Airports EA/EAW  
 c/o MAC Environment Development  
 6040 28th Avenue South  
 Minneapolis, MN 55450

Written comments will be accepted until Thursday, April 19, 2018 at 5:00 PM. All written comments received during the comment period will become part of the project record.

Name: Susan Dunn April 11, 2018

Address: 11018 Upper 33<sup>rd</sup> St. North Lake Elmo, MN

24A I attended the April 4, 2018 proposed Lake Elmo Airport Expansion meeting and oppose the expansion and do support maintaining the existing footprint. 24B

24C After the 4/4/18 meeting, I went home and reviewed the Long Term Comprehensive Plan for Lake Elmo Airport (LID) June 2008.  
Chapter 1 "The activity at the Lake Elmo Airport has been declining,  
Chapter 2 "The number of based aircraft is expected to increase from 236 in 2005, 291 in 2010 to 312 in 2025.  
(The number mentioned at the April 4, 2018 was 183)  
"Micro jet operation is projected by 2025"

24D Please consider the New Richmond option as presented 4/4/2018.

24E The Lake Elmo airport first opened for operation in 1951 and since that time the city and township have evolved around this site making any expansion intrusive, environmentally insensitive and not conducive to this residential area.

Please use the back side of this form for additional comments.

More information about the plan can be found at: [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx)



**Public Comment Form**  
**Lake Elmo Airport Environmental Assessment**  
Public Hearing, Oak-Land Middle School Auditorium, April 4, 2018

April 4/2018

**BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND  
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- 3) Sent via mail to:

Lake Elmo Airports EA/EAW  
c/o MAC Environment Development  
6040 28th Avenue South  
Minneapolis, MN 55450

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Name: Ronald Fredkove

Address: 4220 Osgood Ave. No. Baytown 55082

25A I'm a resident of Baytown since 1977 - 41 years and on the town board since 1989 - 29 years. I've enjoyed the airport and flying out of it with friends that have planes there. I thank you for all the work you are doing. I'm for having a safer airport because there is a lot of growth - houses going on in our community and surrounding communities. I don't understand why people are moving in next to the airport + railroad tracks, and then complain. I'm all for redoing 30th st for the expansion of the runway.

25B Thank you,  
Ron Fredkove  
Resident + Town Board Supervisor

Please use the back side of this form for additional comments.

More information about the plan can be found at: [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx)

**From:** Nelson, Dana  
**To:** Colleen Bosold; Evan Barrett  
**Cc:** Leqve, Chad  
**Subject:** FW: Expanding Lake Elmo airport- citizen feedback  
**Date:** Monday, April 02, 2018 3:18:23 PM

---

Colleen and Evan,

Please include this in the public comments for the Draft EA/EAW.

**DANA NELSON**

*Manager – Noise, Environment and Planning*

**Metropolitan Airports Commission**

6040 28<sup>th</sup> Avenue South

Minneapolis, MN 55450

**O:** 612-725-6330

**F:** 612-725-6310

[www.macnoise.com](http://www.macnoise.com)

---

**From:** Susan Winsor [mailto:susanwinsor@mac.com]

**Sent:** Monday, April 02, 2018 3:11 PM

**To:** Nelson, Dana <Dana.Nelson@mspmac.org>

**Subject:** Expanding Lake Elmo airport- citizen feedback

Ms. or Mr. Nelson;

**26A** | I very much oppose expanding the Lake Elmo airport. Besides the points made in today's  
**26C** | Pioneer Press article, I am sick and tired of airplane noise! We live in Afton in the flight path  
| from that airport and never thought we would have so much noise! These relatively small  
| planes fly quite low and ruin our peaceful tranquil setting. So much of this traffic appears to be  
| recreational flying- on nice summer days when you're outdoors trying to enjoy nature. The  
| main reason we live in Afton was to escape airplane noise from the Twin Cities 20 years  
| ago!!!

**26B**

| I was surprised that noise was not included in that article as a consideration. How fair is it that  
| all the people who have to tolerate that noise do not benefit a whit from the airport!?!?!?! All  
| of the Washington County surveys asking people why they live here is for an appreciation of  
| nature and a peaceful lifestyle. I honestly do not understand why a commercial venture such as  
| an airport should have such a BROAD impact that extends miles beyond what most people  
| think of— the immediate Lake Elmo airport neighborhood.

**26D**

**26E** | Please do not expand this airport, it's not needed given that Holman field is under used (recent  
| Pioneer Press article said this), so we do not need any more metro area "relief."

Sincerely,

Susan Winsor  
15269 42nd St. S.

Afton MN 55001  
[SusanWinsor@mac.com](mailto:SusanWinsor@mac.com)  
651 491 4759

**From:** Leqve, Chad  
**To:** [Wilson, Evan](#); [Colleen Bosold](#)  
**Cc:** [Nelson, Dana](#); [Ralston, Neil](#); [Wilson, Evan](#)  
**Subject:** FW: Lake Elmo Airport EA/EAW  
**Date:** Thursday, April 05, 2018 12:24:46 PM

---

A public comment is below.

Chad

---

**From:** Steven Johnson [mailto:spdjjohnson@me.com]  
**Sent:** Thursday, April 05, 2018 12:04 PM  
**To:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Subject:** Lake Elmo Airport EA/EAW

Thank you for the opportunity to review/comment on the EA/EAW for the Runway 14/32 Relocation/Extension and Associated Improvements at Lake Elmo Airport. I live at 13595 Greenwood Trail, West Lakeland Township, approximately two miles southeast of the end of the runway. I experience light to moderate noise impacts from aircraft, particularly when taking off. It is most noticeable on weekends in warm-weather months, when my windows are open and recreation flights are most common. I do not expect significant changes to that experience at my residence as a result of this project.

27A

27B

I support the aspect of the project that proposes developing 27.5 acres of tall-grass prairie habitat on the airport property. This will benefit a number of pollinators, including the rusty patched bumble bee. I also support efforts to avoid/minimize impacts to Blandings turtles, as described in the EA/EAW and appendices.

Appendix B discusses vehicle traffic on 30<sup>th</sup> Street but does not mention pedestrian/bicycle traffic. 30<sup>th</sup> Street between Neal and Manning avenues is frequently used by joggers and bicyclists on longer duration trips, since it is one of only a few ways out of the residential areas to the east and southeast, especially heading toward Lake Elmo or Lake Elmo Park Reserve to the west. 30<sup>th</sup> Street currently has no shoulders and when bicyclists or joggers encounter cars they are often required to step off into the ditch to avoid being struck. The safety issue is significant, and added to that is the presence in the road ditch of an extensive infestation of wild parsnip (*pastinica sativa*) which is particularly noxious for human physical contact. The EA/EAW's discussion of invasive plants doesn't mention wild parsnip, and should. Care will be needed to eradicate it and prevent its spread when constructing the planned improvements. In addition, impacts to pedestrians/bicyclists can be mitigated by construction of eight-foot blacktop shoulders. Appendix B mentions eight-foot shoulders, but does not make clear if they will be bituminous or gravel. (The half-mile of 30<sup>th</sup> Street between the project and Manning Avenue is in poor condition and should be rebuilt soon; while not part of this project, it should also contain eight-foot asphalt shoulders.) Establishing shoulders on this road is important for the safety of nonmotorized users, considering the vehicle traffic of 1,500 per day (and expected growth to 2,000 by 2030).

27C

27D

27E

Thank you again for the opportunity to comment.

Steve Johnson  
13595 Greenwood Trail N



West Lakeland Township, MN 55082  
[spdjjohnson@comcast.net](mailto:spdjjohnson@comcast.net)

**From:** Leque, Chad  
**To:** [Evan Barrett](#); [Colleen Bosold](#)  
**Cc:** [Nelson, Dana](#); [Ralston, Neil](#)  
**Subject:** FW: My Public Comment on Lake Elmo Airport  
**Date:** Thursday, April 05, 2018 3:23:21 PM

---

EA/EAW comment below.

Chad

-----Original Message-----

From: Jonathan Schmelz [<mailto:jschmelz@saabvw.com>]  
Sent: Thursday, April 05, 2018 3:12 PM  
To: Ralston, Neil <[Neil.Ralston@mspmac.org](mailto:Neil.Ralston@mspmac.org)>  
Cc: Leque, Chad <[Chad.Leque@mspmac.org](mailto:Chad.Leque@mspmac.org)>; Nelson, Dana <[Dana.Nelson@mspmac.org](mailto:Dana.Nelson@mspmac.org)>  
Subject: My Public Comment on Lake Elmo Airport

Mr. Chad Leque  
Metropolitan Airports Commission

RE: Public Comment on the Lake Elmo Airport EA/EAW & Airport Improvement

I am a resident of Lake Elmo and have resided at 24th St N and Legion Ave N since 1998. This is approximately 6000 Feet off of the departure end of Runway 22 (about a mile). I have been following the proposed Improvements to the Lake Elmo Airport for over a year now, and want to publicly voice my support of the proposed Airport Improvements.

28A

28B

In 1998 I was not a pilot nor had any involvement with the airport community. The airport traffic has never been an irritation for me or my family. In fact we have always enjoyed being in our back yard and watching the aircraft fly over. I have never heard any of my neighbors complain about the aircraft that fly overhead at less than 1000 Feet. The noise pollution and shaking windows that we complain about to each other originate from the Railroad traffic that runs east and west just north of the airport and through downtown Lake Elmo. Additionally, the train whistles in the middle of the night at the road crossings can be heard for miles.

28C

In 2005 I visited the airport for the first time since living in Lake Elmo and took an introductory flight from Valter's Aviation on one of their Open House days. After that I pursued my Pilot's License and have since owned 2 Aircraft that were based at the Lake Elmo Airport for more than 10 Years. The first being a Piper Saratoga TC 6 Cylinder Piston Airplane, and the second being a Daher TBM850 Turbine Airplane. Without the airport being less than a mile from my home, and being a long standing part of the Lake Elmo area, I would never have pursued this life path. THE LAKE ELMO AIRPORT HAD A DIRECT IMPACT ON ME BECOMING AN AVIATOR.

28D

After listening to the opposition comments on this project from fellow residents, I have repeatedly heard from many that they do not oppose the airport itself or replacing the runway because of its deteriorating condition. I have however heard opposition to the runway length increasing for fear that this will encourage a new type of aircraft using the airport and therefore increasing the noise pollution for the residents. I want to publicly comment as both a turbine and piston pilot user of the Lake Elmo Airport that the additional runway length WILL NOT CHANGE the aircraft type that use the Lake Elmo Airport. I believe you would need at least a 5000 foot runway to attract the next class of aircraft; your proposal is only 3500 feet. I also want to convey that the Turbine powered TBM needs less runway length to operate than the piston powered Saratoga due to increased power for takeoff performance and the ability to reverse the prop on landing. The majority of aircraft currently using Lake Elmo (which most residents do not oppose the current activity) are similar to the Saratoga – not the TBM, therefore the increased runway length benefit the current users more than the heavier Turbine aircraft that can currently safely use the airport.

28E

**28F**

I believe the increased runway length is NECESSARY FOR PILOT AND GROUND SAFETY FOR THE CURRENT GROUP OF USERS. First, the RPZ would then be contained within the airport and not extend over Manning Avenue or the Railroad track to the north, or over 30th Street to the South. Secondly, I have personally experienced times that I have not been able to come home to Lake Elmo because the runway was contaminated with snow or patchy ice, therefore increasing landing distance beyond my comfort for the current runway length. A 3500 Foot Runway would have been acceptable an acceptable length. Attempts to land under those conditions or misjudgment by a pilot could result in adverse consequences. I do not believe I am the only user to experience this. Lastly, other factors are mitigated by longer runway length that improve safety of the pilot and community such as night landing illusions, and pilots approaching at too high of an airspeed; therefore floating too far past the touchdown zone.

**28G**

Lastly, although I personally preferred other alternatives to the Lake Elmo Airport Improvement, I wholly support the latest option that the Metropolitan Airports Commission has proposed. I support it fully because of the process that has been taken to consider all stakeholders inputs to the project and the revisions that were made as a compromise in order to accommodate the feedback received.

Jonathan Schmelz

**From:** Leqve, Chad  
**To:** [Evan Barrett](#); [Colleen Bosold](#)  
**Cc:** [Nelson, Dana](#); [Ralston, Neil](#); [Wilson, Evan](#)  
**Subject:** Fwd: Lake Elmo Airport 21D  
**Date:** Wednesday, April 04, 2018 10:20:11 PM

---

Comment for the record.

**CHAD E. LEQVE**  
*Director of Environment*  
**Metropolitan Airports Commission**  
[6040 28<sup>th</sup> Avenue South](#)  
[Minneapolis, MN 55450](#)  
**O:** [612-725-6326](#)  
**F:** [612-725-6310](#)  
[www.MetroAirports.org](#)  
[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Rod Ough <[raough@yahoo.com](mailto:raough@yahoo.com)>  
**Date:** April 4, 2018 at 8:51:22 PM CDT  
**To:** "[chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)" <[chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)>, "[ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org)" <[ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org)>  
**Subject:** Lake Elmo Airport 21D

- 29A | I have just came back from the Public Hearing held at the Oak-Land Middle School and wanted to comment on what I heard.
1. I am a pilot.
  2. I am in favor of the planned Lake Elmo project. It is needed for the safety of the pilots and those living nearby.
  3. I understood the primary concern was the noise. The adjustment to the plan has eliminated much or all of that.
  4. Most people do not want the airport, road etc due to change. I understand that. I moved into my Woodbury home surround by corn fields. The following year, they were replaced by houses. We didn't like that but change will happen. Things can not stay the same, even if we want them too.
  4. People forget the advantage of having an airport nearby. Civil Air Patrol encourage kids to take up flying or get into science and engineering (much needed). Every summer the EAA take up kids and let them fly the plane to encourage them to fly (free of charge). They also provide ground school for future pilots. None if that would happen if there was no airport.
  5. Lets not forget that the airport also support other businesses nearby the airport
  6. I am 6 miles and 10 min from 21D. New Richmond is 30 miles and 40 min away (in good weather).
  7. I almost laugh when New Richmond airport guy talked. Yea, Lake Elmo does not need it, give it to New Richmond. By the way, send all of the planes and business to New Richmond, WI too.
  8. I heard misunderstood comments made by some people.  
- Jets will come. Yea, a bunch of pilots in Cubs and Skyhawks want to do touch and goes

29B

with jets on their tails.  
**29F** - Go to to St Paul airport. Control tower. Jets. Controls airspace. Time/cost to fly out of cities.

**29G** p.s. As for the comment about taking up to 55 min to get to MSP. I have lived in Woodbury for 20 years and it has taken me over an hour to drive to MSP (in good weather) in rush hour. I plan for 35-40 min in good weather and low traffic conditions.

Rod Ough  
2126 Woodcrest Dr  
Woodbury, MN 55129



**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Message from www.faa.gov: Comment/Question For Minneapolis Airports District Office  
**Date:** Monday, April 16, 2018 4:27:37 PM

---

I'm going back through my emails and I think I forgot to send you this one.

R. Evan Barrett, AICP | Planner, Aviation Services  
Mead & Hunt, Inc | 7900 West 78th Street, Suite 370 | Minneapolis, MN 55439  
Main: 952-941-5619 | Mobile: 612-597-4262 | Direct: 952-641-8820  
[evan.barrett@meadhunt.com](mailto:evan.barrett@meadhunt.com) | [www.meadhunt.com](http://www.meadhunt.com)

-----Original Message-----

From: Leqve, Chad <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>  
Sent: Friday, April 6, 2018 10:21 AM  
To: 'Joshua.Fitzpatrick@faa.gov' <[Joshua.Fitzpatrick@faa.gov](mailto:Joshua.Fitzpatrick@faa.gov)>; Evan Barrett <[Evan.Barrett@meadhunt.com](mailto:Evan.Barrett@meadhunt.com)>  
Cc: [Andy.PEEK@faa.gov](mailto:Andy.PEEK@faa.gov); [Nancy.Nistler@faa.gov](mailto:Nancy.Nistler@faa.gov); [Lindsay.Butler@faa.gov](mailto:Lindsay.Butler@faa.gov); [Gina.Mitchell@faa.gov](mailto:Gina.Mitchell@faa.gov)  
Subject: RE: Message from www.faa.gov: Comment/Question For Minneapolis Airports District Office

Will do

Chad

-----Original Message-----

From: Joshua.Fitzpatrick@faa.gov [<mailto:Joshua.Fitzpatrick@faa.gov>]  
Sent: Friday, April 06, 2018 10:19 AM  
To: Leqve, Chad <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>; [evan.barrett@meadhunt.com](mailto:evan.barrett@meadhunt.com)  
Cc: [Andy.PEEK@faa.gov](mailto:Andy.PEEK@faa.gov); [Nancy.Nistler@faa.gov](mailto:Nancy.Nistler@faa.gov); [Lindsay.Butler@faa.gov](mailto:Lindsay.Butler@faa.gov); [Gina.Mitchell@faa.gov](mailto:Gina.Mitchell@faa.gov)  
Subject: FW: Message from www.faa.gov: Comment/Question For Minneapolis Airports District Office

Chad,

Comment below on the 21D Draft EA came into our office. Please include in DEA for consideration.

Thanks,

Josh Fitzpatrick  
Environmental Protection Specialist  
FAA Dakota-Minnesota Airport District Office [Joshua.Fitzpatrick@faa.gov](mailto:Joshua.Fitzpatrick@faa.gov)  
(612) 253-4639

-----Original Message-----

From: [dianemcgann@earthlink.net](mailto:dianemcgann@earthlink.net) [<mailto:dianemcgann@earthlink.net>]  
Sent: Wednesday, April 04, 2018 3:02 PM  
To: Peek, Andy (FAA) <[Andy.PEEK@faa.gov](mailto:Andy.PEEK@faa.gov)>  
Subject: Message from www.faa.gov: Comment/Question For Minneapolis Airports District Office

This email was sent through the Federal Aviation Administration's public website. You have been contacted via an email link on the following page: [www.faa.gov/airports/great\\_lakes/about\\_airports/dma-ado/](http://www.faa.gov/airports/great_lakes/about_airports/dma-ado/)

Message:

**30A**  
**30C**

I encourage your opposition to the expansion of the Lake Elmo airport. It is located in the middle of residential neighborhoods and is within 15 miles of two other major airports. The airport is home to several pilots-in-training who fly at low altitudes over homes in the area. I urge demolition of this airport, rather than expansion, and encourage your resistance to the expansion plan.

**30B**  
**30D**  
**30E**



## Public Comment Form

Lake Elmo Airport Environmental Assessment

Public Hearing, Oak-Land Middle School Auditorium, April 4, 2018

**BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND  
MAY BE INCLUDED IN A PUBLIC DOCUMENT.**

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- 3] Sent via mail to:

Lake Elmo Airports EA/EAW  
c/o MAC Environment Development  
6040 28th Avenue South  
Minneapolis, MN 55450

Written comments will be accepted until Thursday, April 19, 2018 at 5:00 PM. All written comments received during the comment period will become part of the project record.

Name:                     **Dave Becker**                    

Address:                     **10 Warren, St Paul, MN. 55119**                    

**31A** I am writing in full support of the current plan to improve safety at Lake Elmo airport  
by relocating and extending the 14-32 runway and other improvements associated  
with the plan.

**31B** As a pilot located at Lake Elmo for over 20 years, these improvements have been in  
the planning stage for about as long as I have been flying at Lake Elmo with many  
concessions made to help satisfy the well organized opposition group who are  
fighting the plans.

**31C** As a public reliever airport for the greater Twin Cities area, the Lake Elmo airport  
has upheld its obligation and service to the community for a long time. I want the  
MAC to ensure that this airport remains a valuable service to pilots and the  
community by following through and making these proposed safety improvements.

**Thank You**

**Dave Becker**

Please use the back side of this form for additional comments.

More information about the plan can be found at: [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx)

**From:** Leqve, Chad  
**To:** [Evan Barrett](#); [Colleen Bosold](#); [Nelson, Dana](#); [Wilson, Evan](#); [Ralston, Neil](#)  
**Subject:** Fwd: Support for Lake Elmo 21D Project  
**Date:** Saturday, April 07, 2018 3:36:43 PM

---

**CHAD E. LEQVE**  
*Director of Environment*  
**Metropolitan Airports Commission**  
[6040 28<sup>th</sup> Avenue South](#)  
[Minneapolis, MN 55450](#)  
**O:** [612-725-6326](tel:612-725-6326)  
**F:** [612-725-6310](tel:612-725-6310)  
[www.MetroAirports.org](http://www.MetroAirports.org)  
[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Eric Lobner <[eric.lobner@gmail.com](mailto:eric.lobner@gmail.com)>  
**Date:** April 7, 2018 at 2:38:06 PM CDT  
**To:** [Chad.leqve@mspm.com](mailto:Chad.leqve@mspm.com)  
**Subject:** Support for Lake Elmo 21D Project

Chad,

**32A**

My name is Eric Lobner, I am a pilot and member of a flying club located at Lake Elmo airport. I am writing to you to voice my vote of support for the proposed changes to 21D as a part of the long-term comprehensive plan for the airport.

**32B**

I would like to start off by thanking you and your fellow MAC representatives for the work that you do to keep 21D the wonderful airport it is. I have read through the comprehensive plan, the environmental assessments and many of the other documents on the process that has been followed as a part of the proposed upgrades at 21D and have made several conclusions. First and foremost, I believe that the process you are following is fair for all parties involved, especially in the way that input is solicited, documented and incorporated into finalization of the plan. The second conclusion is that the proposed upgrade is necessary to support continued operations at 21D. While many of us enjoy the challenge of landing on the scant 2800' for 14/32, I think we all would agree that adding a few hundred extra feet would add an extra margin of safety that would benefit all. The improved lighting and approaches will also be helpful for improving safety for particularly dangerous conditions when flying at night or in instrument conditions. I think that this reason alone should be enough to approve the proposed project.

**32C**

**32D**

I am concerned about the amount of mis-information being spread by those that oppose the project. We in the aviation community know that many of the

concerns about dramatically increased usage, larger class aircraft, intolerable light pollution and the potential for additional accidents are largely unfounded fears. I again appreciate you and your colleagues for hosting public forums to educate the public on these issues.

**32E**

Lake Elmo airport has been a critical part of the transportation infrastructure and economic driver of the East metro area since the 1950's. I'm proud to be a pilot based at 21D and voice my support for the proposed modifications to Lake Elmo.

Thank you,

-Eric Lobner



**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Lake Elmo Airport Expansion  
**Date:** Monday, April 16, 2018 8:29:15 AM  
**Attachments:** [Sister Agency Mission.pdf](#)  
[ATT00001.htm](#)

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Sunday, April 15, 2018 9:21 AM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo Airport Expansion

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28th Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](tel:612-725-6326)

**F:** [612-725-6310](tel:612-725-6310)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** "Elizabeth Buckingham" <[itabit@comcast.net](mailto:itabit@comcast.net)>  
**Date:** April 15, 2018 at 7:46:39 AM CDT  
**To:** <[chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)>  
**Cc:** <[andy.peek@faa.gov](mailto:andy.peek@faa.gov)>, <[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)>, <[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)>

**Subject: Lake Elmo Airport Expansion**  
Comment letter.

April 11, 2018

TO: Metropolitan Airport Commission

- 33A** | It is very disturbing to me that you, in good conscience, will intentionally remove 20 acres of woodlands, some historic trees, on MAC property at the Lake Elmo Airport and its neighbors in Baytown Township and West Lakeland Township. Since MAC is a State agency, it should encompass what another State agency, the Minnesota State Lottery, mission is: "Restore, enhance and protect high-quality habitat for Minnesota wildlife, fight invasive species, protect native species and improve air and water quality." Why does MAC conflict a sister Agency?
- 33B** |
- 33C** | Like Rachel Carson explains in her profound book Silent Spring – we need to protect wildlife habitats for not only our generation, but future generations. By senselessly removing woodlands, you not only kill, but also endanger wildlife habitats along with harming mankind with more winds, noise pollution, light pollution and put at risk neighbors with larger aircraft.
- 33D** | The pilots should pay for any and all improvements designated by MAC because, after all, it's the pilots' Country Club.

Elizabeth Buckingham

cc: Andrew Peek-FAA, Rep. Kathy Lohmer, Senator Karin Housley

- 33E** | PS. I expect a personal written reply from MAC.

**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Lake Elmo Airport Expansion  
**Date:** Monday, April 16, 2018 8:25:39 AM  
**Attachments:** [Rusty Patched Bumble Bee.pdf](#)

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Saturday, April 14, 2018 11:04 AM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>; Sirois Kron, Christene <Christene.SiroisKron@mspmac.org>  
**Subject:** FW: Lake Elmo Airport Expansion

FYI

Chad

---

**From:** Elizabeth Buckingham [<mailto:itabit@comcast.net>]  
**Sent:** Saturday, April 14, 2018 10:25 AM  
**To:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Cc:** [andy.peek@faa.gov](mailto:andy.peek@faa.gov); [rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn); [sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)  
**Subject:** Lake Elmo Airport Expansion

Comment letter.

April 5, 2018

TO: Metropolitan Airport Commission

**34A** | I live in Baytown Township a short distance east of the Lake Elmo Airport. I am concerned about the Endangered Species Rusty Patched Bumble Bee ("RPBB") habitat on MAC property. I've learned from the U of MN Bee Laboratory that it has confirmed RPBB's habitat at the Lake Elmo Park Reserve (LEPR). I have seen them on my property also. MAC's property lies squarely between the LEPR and my property.

Shame on you MAC, you should respect life in all forms and not intentionally destroy it with deliberate careless actions.

**34C** | Pilots knew the length of the runways when they decided to hangar at Lake Elmo Airport. It was built in 1951 and MAC's outdated expansion plan is from 1965 and has been abandoned previously. Holman Field and New Richmond, Wisconsin airports are close enough for pilots to use because of excellent freeway systems. The St Croix River Crossing Bridge opened in August last year and it's an easy drive to New Richmond. We know Holman Field in downtown St Paul is also an easy drive.

**34B**

Elizabeth Buckingham

cc: Andrew Peek-FAA, Rep. Kathy Lohmer, Senator Karin Housley

**34D** | PS. I expect a personal written reply from MAC.

**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Lake Elmo Airport comment  
**Date:** Monday, April 16, 2018 8:46:06 AM

---

**From:** Nelson, Dana <Dana.Nelson@mspmac.org>  
**Sent:** Monday, April 16, 2018 8:45 AM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Leqve, Chad <Chad.Leqve@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** FW: Lake Elmo Airport comment

FYI

**DANA NELSON**

*Manager – Noise, Environment and Planning*

**Metropolitan Airports Commission**

6040 28<sup>th</sup> Avenue South

Minneapolis, MN 55450

**O:** 612-725-6330

**F:** 612-725-6310

[www.macnoise.com](http://www.macnoise.com)

---

**From:** Jones, Norman [<mailto:NJones@winthrop.com>]  
**Sent:** Saturday, April 14, 2018 9:26 AM  
**To:** ContactLakeElmoAirportEA <[ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org)>  
**Cc:** [norman.jones@comcast.net](mailto:norman.jones@comcast.net)  
**Subject:** Lake Elmo Airport comment

Dear MAC folks,

**35A** | I'm writing in favor of the proposed improvements to the Lake Elmo airport.

**35B** | As new pilots and hangar owners, my wife and I have become more and more dependent on being able to get in and out of Lake Elmo airport to do business and to be available for family medical issues out of town. The plane is a lifeline for me and my family and I worry sometimes with the runway length, leaving little margin of safety for failure, weather, miscalculation, or mechanical issue.

**35C**

**35D** | Continuing to have the shortest paved runway around would not be safe in the long run. The runway extension is really a great idea, just in the nick of time, I'd say. It seems to me that pilot training at Lake Elmo is on the rise (younger pilots), an older generation of pilots is still flying, and GA planes are generally an aging fleet. Some of that could spell more dangerous operations in Lake Elmo without a little more margin of safety. I feel that you've included items that are well chosen.

Since you are trying to keep pilots, passengers, and indirectly, folks on the ground, safer, you have my thanks for what you are doing. What you are doing is the air equivalent of what a city does on the ground when an intersection gets busier or more dangerous and they update a stop sign to a stop light. People tend to think of the slight inconvenience added and ignore the safety improvement for everyone. Thank goodness someone with a view to the general good is making those decisions.

It seems to me that the airport improvements are similar. It's a temptation for people to focus on their



own inconvenience, especially when the safety benefits are perceived to be for SOMEONE ELSE. As a "someone else", I'm glad you are there making decisions for the general good.

Thanks very much.

--Norm



**Norman L. Jones**  
**Winthrop & Weinstine, P.A.**  
Shareholder  
(612) 604-6605  
[njones@winthrop.com](mailto:njones@winthrop.com)  
[vCard](#) | [Bio](#) | [LinkedIn](#)

Capella Tower | Suite 3500 | 225 S 6th Street | Minneapolis, MN 55402

Notice: Important disclaimers & limitations apply to this email.  
[Please click here for our disclaimers and limitations.](#)

**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Public comment form  
**Date:** Monday, April 16, 2018 8:50:01 AM  
**Attachments:** [4-15-18, 225 PM Office Lens.pdf](#)

-----Original Message-----

From: Nelson, Dana <[Dana.Nelson@mspmac.org](mailto:Dana.Nelson@mspmac.org)>  
Sent: Monday, April 16, 2018 8:49 AM  
To: Evan Barrett <[Evan.Barrett@meadhunt.com](mailto:Evan.Barrett@meadhunt.com)>; Wilson, Evan <[Evan.Wilson@mspmac.org](mailto:Evan.Wilson@mspmac.org)>; Leqve, Chad  
<[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>; Ralston, Neil <[Neil.Ralston@mspmac.org](mailto:Neil.Ralston@mspmac.org)>  
Subject: FW: Public comment form

FYI

DANA NELSON

Manager – Noise, Environment and Planning Metropolitan Airports Commission  
6040 28th Avenue South  
Minneapolis, MN 55450  
O: 612-725-6330  
F: 612-725-6310  
[www.macnoise.com](http://www.macnoise.com)

-----Original Message-----

From: Ben Ross [<mailto:ben.ross@comcast.net>]  
Sent: Sunday, April 15, 2018 2:28 PM  
To: ContactLakeElmoAirportEA <[ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org)>  
Subject: Public comment form



## Public Comment Form

Lake Elmo Airport Environmental Assessment  
Public Hearing, Oak-Land Middle School Auditorium, April 4, 2018

**BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND  
MAY BE INCLUDED IN A PUBLIC DOCUMENT.**

Completed forms can be:

- 1) Left with us at the public hearing;
- 2) Sent via email to [ContactLakeElmoAirportEA@mspm.com](mailto:ContactLakeElmoAirportEA@mspm.com); or
- 3) Sent via mail to:

Lake Elmo Airports EA/EAW  
c/o MAC Environment Development  
6040 28th Avenue South  
Minneapolis, MN 55450

Written comments will be accepted until Thursday, April 19, 2018 at 5:00 PM. All written comments received during the comment period will become part of the project record.

Name: Ben Ross

Address: 13178 24<sup>th</sup> Street Ct. N. West Lakeland, MN 55082

I submitted four questions on 8/2/15. Three received a response in my review of the FAQs. However, my 4<sup>th</sup> question did not. It was/is related to root cause analysis showing the runway length at Lake Elmo was the cause of any incidents that have occurred. Given my simple question, as the NTSB would investigate all incidents, I have to assume that there are zero incidents showing runway length being the root cause due to the lack of response. 36A

At the hearing on 4/9/18 we heard from some pilots. Their main message is that it is inconvenient for them and their hobby to have the airport exist as is. Just as we homeowners chose to build where we did these same pilots chose to house their aircraft where they did. This project is serving the hobbies of pilots who have options ~~rather~~ rather than the homeowners who built here (West Lakeland, Bayport Township, Lake Elmo). If the airport doesn't meet their needs they can go elsewhere, for example 36B  
River Falls 36C

Please use the back side of this form for additional comments.

More information about the plan can be found at: [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx)

**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Lake Elmo  
**Date:** Monday, April 16, 2018 8:31:07 AM  
**Attachments:** [img001.pdf](#)  
[ATT00001.htm](#)

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Sunday, April 15, 2018 3:58 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>;  
Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

6040 28th Avenue South

Minneapolis, MN 55450

**O:** 612-725-6326

**F:** 612-725-6310

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Helen Kernik <hkernik@comcast.net>  
**Date:** April 15, 2018 at 2:15:11 PM CDT  
**To:** [Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)  
**Subject:** Lake Elmo



To: Metropolitan Airports Commission

**Re: Lake Elmo Airport Expansion**

**37A**

I have friends that live just off 30<sup>th</sup> Street east of the Lake Elmo Airport. Driving to their home during the winter can be a terrifying experience because of the snow and ice conditions on 30<sup>th</sup> street. The proposed reconfiguration of 30<sup>th</sup> street will greatly reduce traffic safety in this area. This proposal should be rejected.

Helen Kernik



cc: Andrew Peek, FAA  
Senator Karin Housley  
Representative Kathy Lohmer



**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Health of Citizens more important than Lake Elmo Airport Expansion  
**Date:** Monday, April 16, 2018 8:24:45 AM

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Saturday, April 14, 2018 4:05 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Health of Citizens more important than Lake Elmo Airport Expansion

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](tel:612-725-6326)

**F:** [612-725-6310](tel:612-725-6310)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Pete Widin <[pete@artisanenvironments.com](mailto:pete@artisanenvironments.com)>  
**Date:** April 14, 2018 at 1:45:38 PM CDT  
**To:** [chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)  
**Subject:** **Health of Citizens more important than Lake Elmo Airport Expansion**

To: Metropolitan Airport Commission

I am a lifelong resident of Lake Elmo and an ecologist and landscape architect. I oppose the expansion of the Lake Elmo Airport for the following reasons..

- 38A** 1) It is not a necessary transportation hub for the area
- 38B** 2) The expansion will re-suspend sediments and potential TCE's which are already a problem for our local water sources. Water quality is crucial to the livability of our area.
- 38C** 3) There will be important wetlands and natural habitat removed and by the expansion - our local economy depends quite a bit on local recreation for waterfowl hunting, birdwatching etc.
- 38D** 4) There are now neighborhoods right across the street from the airport which will be a constant source of complaints and safety/nuisance issues

Please reach out with any questions,

Pete Widin, MLA

**From:** Leqve, Chad  
**To:** [Evan Barrett](#); [Colleen Bosold](#)  
**Cc:** [Nelson, Dana](#); [Ralston, Neil](#); [Wilson, Evan](#)  
**Subject:** Fwd: Lake Elmo Airport Improvements  
**Date:** Friday, April 06, 2018 6:14:12 PM

---

A public comment

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](tel:612-725-6326)

**F:** [612-725-6310](tel:612-725-6310)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Derek Gilbert <[derek@anchorinsuranceagents.com](mailto:derek@anchorinsuranceagents.com)>  
**Date:** April 6, 2018 at 4:55:53 PM CDT  
**To:** "[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)" <[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)>  
**Subject:** Lake Elmo Airport Improvements

Hello Mr. Leqve,

I have been following along on the Airport Improvement Comprehensive plan and attended your recent meeting at the Middle School. As requested I would like to submit my written comments and support for the plan.

First thank you as well as the others for all of your efforts in helping accomplish the improvements as well as listen to our airports neighbors and work to find viable solutions to their concerns.

**39A**

I support the MAC's Long-Term Comprehensive plan and would like to see us complete the project. I agreed with Mr. Wenck's observation, that the airport was in existence prior to every speaker that opposed the project that spoke at the meeting. There a few if any people in the immediate area that were living in their homes before the airport was built. I also noticed that not only had the opponents that spoke bought or built after the airport existed, but after the 1966 Long-Term Comprehensive Plan had been created as well. The current proposal calls for reduced runway lengths than the original plans due in part to accommodating the concerns of neighbors.

Mr. Wenck also gave some statistical data about neighboring population and the very

low percentage of that population that is expressing opposition to the project. His data showed that the opposition that was in attendance was approximately 1% of the 11,000 plus population in the affected townships.

**39B** | The plan calls for solid fencing to help shield the runway approach lighting, if neighbors disapprove of the solid fencing, perhaps some bushes and more natural vegetation can be planted in these areas to create a more natural and aesthetic barrier.

**39C** | I am a resident of Hudson WI as well as own a business located in Hudson, I fly both for business and recreation. I looked at several locations before deciding where to fly out of. My top choice was Lake Elmo due to it's geographical location to the east side of the twin cities. New Richmond is not a convenient location and is in the opposite direction of where most businesses and passengers reside. St. Paul is also much further, and

**39E** | then forces me to deal with both roadway traffic and increased air traffic and larger planes, which create more hazards for small planes, as we also do for them.

**39F** | The proposed runway length of 3500 feet does not accommodate larger aircraft, but rather increases safety for the planes already landing and departing from 21D. The relocation of the airstrip, decreases noise, as the runway will be located a few hundred yards away from the new housing development across Manning Ave. Noise of small airplanes is greatest during takeoffs, not landings, the longer airstrips will mean that my

**39H** | liftoff happens sooner along the airstrip therefore giving me more altitude when I pass over or near the neighboring homes, therefore reducing the noise levels that they experience.

In closing I have been impressed with the effort that MAC has put forth to listen to our neighbors and has made outstanding efforts to accommodate their concerns as best as possible. The plan has been altered to try to best balance airport needs and neighbor courtesy. Unfortunately no matter what efforts are taken, there are always some people that are unhappy. This is part of life and as long as due diligence has been taken to listen and attempt to minimize concerns of others, then progress needs to proceed. Many people were opposed to the New Hwy 36 bridge crossing, however more are enjoying the benefits that it has provided. Those benefits for many outweigh the inconveniences of a few; the same as the Lake Elmo Airport Improvements will.

Best Regards,

Derek Gilbert  
Anchor Insurance

WI Office 715-386-5757  
MN Office 651-309-1020  
Cell 651-434-8080

**39D**

**39G**

**39I**

[derek@anchorinsuranceagents.com](mailto:derek@anchorinsuranceagents.com)



**From:** Nelson, Dana  
**To:** [Colleen Bosold](#); [Evan Barrett](#)  
**Cc:** [Leqve, Chad](#); [Ralston, Neil](#)  
**Subject:** FW: Lake Elmo Airport  
**Date:** Wednesday, April 11, 2018 11:35:44 AM

---

Elmo Public Comment.

DANA NELSON  
Manager – Noise, Environment and Planning  
Metropolitan Airports Commission  
6040 28th Avenue South  
Minneapolis, MN 55450  
O: 612-725-6330  
F: 612-725-6310  
[www.macnoise.com](http://www.macnoise.com)

-----Original Message-----

From: craig berggren [<mailto:craigberggren@me.com>]  
Sent: Wednesday, April 11, 2018 11:35 AM  
To: ContactLakeElmoAirportEA <[ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org)>  
Subject: Lake Elmo Airport

40A

I would like Mac to quit saying expansion of 21D , it's a redevelopment within its property lines , no worse or better then remodeling a house ,being a pilot and hangar owner I would like to see more signage on taxiways and runways seeing How this a major airport for training. Moving ahead with this redevelopment will insure that lake Elmo Airport is modernized for future use . Also keeping Lake Elmo airport a viable resource and staging area for the twin cities in case of a crisis heaven forbid . Moving ahead with this project will only make Lake ElmoAirport a more safer reliever airport for the twin cities .

Thank You.

Craig Berggren  
5865 Neal Ave N. #333  
Stillwater,Mn. 55082

Sent from my iPad

40B

40C

40D

**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Lake Elmo airport expansion  
**Date:** Monday, April 16, 2018 8:31:22 AM

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Sunday, April 15, 2018 8:08 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Ralston, Neil <Neil.Ralston@mspmac.org>; Nelson, Dana <Dana.Nelson@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo airport expansion

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](#)

**F:** [612-725-6310](#)

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[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Michelle Rose <[michellerose0718@gmail.com](mailto:michellerose0718@gmail.com)>  
**Date:** April 15, 2018 at 7:06:56 PM CDT  
**To:** [chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)  
**Cc:** [sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn), [rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)  
**Subject:** Lake Elmo airport expansion  
**Reply-To:** [michellerose0718@gmail.com](mailto:michellerose0718@gmail.com)

Dear Mr. Leqve,

**41A** | I am writing to express my strong support in favor of the MAC "No Action" plan in regards to *not* expanding the runways at the Lake Elmo Airport.

**41B** | Why I am against the runway expansion? As a resident who lives 1 mile away from the airport, the proposed runway expansion would put my house directly in the safety zone, which is terrifying to me and my two young children in case, God forbid, there was ever a crash.

**41C** | In addition, I am against the 30th street relocation - this is an expensive project that would result in ground water contamination, slowing down of traffic flow, and loss of natural wetlands.

**41D** | My neighbors and I enjoy the small hobby planes that use the airport, but we are very much opposed to the added noise and disturbance that larger aircraft will bring. There are other airports nearby (New Richmond, for example), that can handle larger aircraft.

**41E**

Thank you for your attention.

Michelle Rose  
13170 24th Street Ct N  
West Lakeland, MN 55082

**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: STOP the proposed Lake Elmo Airport expansion  
**Date:** Monday, April 16, 2018 8:30:42 AM

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Sunday, April 15, 2018 12:18 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: STOP the proposed Lake Elmo Airport expansion

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

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**F:** [612-725-6310](tel:612-725-6310)

[www.MetroAirports.org](http://www.MetroAirports.org)

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Begin forwarded message:

**From:** Karen Baltzer <[klbaltzer@msn.com](mailto:klbaltzer@msn.com)>  
**Date:** April 15, 2018 at 12:12:54 PM CDT  
**To:** "[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)" <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>  
**Subject:** STOP the proposed Lake Elmo Airport expansion

April 15, 2018

Dear Mr. Leqve:

**42A** | I have lived in West Lakeland for 13 years and I am asking you to **STOP** the proposed expansion of the Lake Elmo Airport for the following reasons:

- 42B** |
- Neighboring airports (Holman Field and New Richmond Regional) are underutilized. These airports provide convenient alternatives to the Lake Elmo Airport. Quoting the March 31 Pioneer Press article about Holman Field, "it has had flights decrease from 118,000 in 2007 to 40,500 in 2017. The New Richmond airport is also underutilized and is anxious to acquire the air traffic from Lake Elmo. It takes approximately 15 minutes to drive across our new \$650 million dollar bridge from the Lake Elmo Airport to the New Richmond Airport. Why are "we" pouring \$11-14,000,000 into Lake Elmo airport, when these other nearby airports are open and underutilized?
- 42D** |

**42C**

**42E**

**42F**

- The airport neighbors have accepted the hobby airport that is there now however we do

not support making this into a business airport as MAC representatives have stated is their intent.

**42G**

- The realignment of 30<sup>th</sup> street will create a new traffic safety hazard on this very busy street. This street is a major thru-way for Baytown and West Lakeland. There are already plans to add turning lanes and traffic lights where 30<sup>th</sup> street joins Manning Avenue due to all of the traffic on 30<sup>th</sup> Street. 30<sup>th</sup> Street needs to stay in its current configuration as a straight road and also to stay intact where it joins Neal Ave and Manning Avenue for the safety of all of us who drive 30<sup>th</sup> Street every day.

**42H**

- In West Lakeland we have a 2.5 acre minimum lot size, so our ability to enjoy our yards is one of the primary reasons we live in West Lakeland. The expansion will undoubtedly bring in more and larger aircraft intruding on the peace and quiet of our neighborhoods.

**42I**

- No zoning has ever been done for this 'planned' Lake Elmo Airport expansion. The neighborhoods surrounding the Lake Elmo Airport have been extensively built up over the last 20+ years and continue to do so. Neighboring homeowners were not informed of this expansion 'plan' when we bought/built our homes. This lack of zoning puts residents and pilots at risk. The New Richmond Airport has had zoning in effect for over 25 years. People purchasing lots within three miles of the New Richmond Airport were required to sign an acknowledgement of the airport and agree not to complain about it or object to any and all changes(per Mike Demulling, New Richmond Regional Airport 715-246-7735).

**42L**

**42M**

- There is significant potential for increased groundwater contamination in our wells due to the disruption of the current watershed with this project.

**42J**

**42K**

Please stop this needless waste of money that will create a new auto traffic safety hazard on 30<sup>th</sup> Street and intrude on our neighborhoods when there are safe, convenient alternatives available for the pilots that currently use the Lake Elmo Airport.

**42N**

Best Regards,

Karen Baltzer

13232 20<sup>th</sup> Street Ct. N.

West Lakeland, MN 55082

952-484-5043



**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Opposition to the proposed Lake Elmo Airport  
**Date:** Monday, April 16, 2018 1:10:37 PM

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Monday, April 16, 2018 12:51 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Opposition to the proposed Lake Elmo Airport

FYI

CHAD E. LEQVE  
*Director of Environment*  
Metropolitan Airports Commission  
[6040 28<sup>th</sup> Avenue South](#)  
[Minneapolis, MN 55450](#)  
O: [612-725-6326](#)  
F: [612-725-6310](#)  
[www.MetroAirports.org](#)  
[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

From: Amy Kaschmitter <[kasc0010@umn.edu](mailto:kasc0010@umn.edu)>  
Date: April 16, 2018 at 12:49:00 PM CDT  
To: [Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org), [sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn),  
[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)  
Subject: Opposition to the proposed Lake Elmo Airport

Dear Sir and Madams,

**43A** | I am writing to tell you I am opposed to the proposed moving and lengthening of the main runway in Lake Elmo.

**43B** | I don't feel you have adequate remediation proposed for removal of the 20+ acres of trees and 2.36 acres of wetlands. The impacts to the neighbors will be

**43D** | unacceptable. Currently the trees add a buffer to light and noise pollution from the airport.

**43E** | Also the impact of moving 30<sup>th</sup> Street North will bring the planes closer to established neighborhoods, increasing noise and safety concerns to residents.

**43F** | Please change this plan and leave the runway in its current position.

Thank you,

Amy Kaschmitter

**43C**

**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW:  
**Date:** Monday, April 16, 2018 1:12:06 PM  
**Attachments:** [MAC petition.pdf](#)  
[ATT00001.htm](#)

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Monday, April 16, 2018 12:05 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>;  
Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd:

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

6040 28th Avenue South

Minneapolis, MN 55450

**O:** 612-725-6326

**F:** 612-725-6310

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** KAY AND STAN BACH <kayandstanbach@msn.com>  
**Date:** April 16, 2018 at 11:46:20 AM CDT  
**To:** "chad.leqve@mspmac.org" <chad.leqve@mspmac.org>  
**Cc:** "andy.peek@faa.gov" <andy.peek@faa.gov>, "rep.kathy.lohmer@house.mn" <rep.kathy.lohmer@house.mn>, "sen.karin.housley@senate.mn" <sen.karin.housley@senate.mn>, Elizabeth Buckingham <itabit@comcast.net>  
**Subject:** Fwd:

Begin forwarded message:

**From:** KAY AND STAN BACH <kayandstanbach@msn.com>  
**Date:** April 16, 2018 at 11:36:44 AM CDT  
**To:** KAY AND STAN BACH <kayandstanbach@msn.com>

April 16, 2018

Metropolitan Airport Commission

**44A** | I am opposed to runway expansion at Lake Elmo Airport for the following reasons:

**44B** | -the potential for further ground water contamination. Ground water and its preservation is essential to the continued health of our community.

**44C** | -loss of trees and natural habitat. The pollinator population, especially, depends on the natural habitat and wet lands in and around the Lake Elmo area.

**44D** | -loss of property value. Noise pollution, light pollution, and rerouting of roads will change the value of existing properties.

**44E** | I am requesting that you acknowledge my concerns, reconsider your chosen options, and resolve to work with the resident and pilot communities to come to a reasonable and agreed upon solution toward the future of Lake Elmo Airport.

Respectfully submitted,

Kathryn A. Bach

**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: We do not want Lake Elmo Airport Expansion  
**Date:** Tuesday, April 17, 2018 6:56:17 AM

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Monday, April 16, 2018 6:31 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: We do not want Lake Elmo Airport Expansion

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](tel:612-725-6326)

**F:** [612-725-6310](tel:612-725-6310)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** L U <[jl ranch2@outlook.com](mailto:jl ranch2@outlook.com)>  
**Date:** April 16, 2018 at 5:57:17 PM CDT  
**To:** "[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)" <[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)>  
**Cc:** "[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)" <[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)>, "[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)" <[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)>  
**Subject:** **We do not want Lake Elmo Airport Expansion**

Dear Mr. Chad Leqve

**45A** | Reagarding the Lake Elmo Airport expansion that most people do not want, that would ruin our neighborhood and would be financially irresponsible...Please listen to the people!

**45B**

**45C** | We are in favor of the MAC "No Action" plan, which would allow the MAC to repair or rebuild the current runways in their current locations and at the current lengths. We are asking the MAC to assume their responsibility as part of this community, in preserving our water resources and neighborhood. Below are many reasons not to move forward with an expansion of Lake Elmo Airport.

**45D**

- |  |                                    |            |
|--|------------------------------------|------------|
| <b>45E</b>   30th St relocation unsafe       | Further ground water contamination | <b>45F</b> |
| <b>45G</b>   Lack of zoning                  | Major loss of property value       | <b>45H</b> |
| <b>45I</b>   Larger aircraft are unwanted    | Loss and damage to wildlife        | <b>45J</b> |
| <b>45K</b>   Added noise and light pollution | Loss of trees and natural habitat  | <b>45L</b> |

**45M** | There are airports within 20 mi of Lk Elmo that are under-utilized that can accept the larger aircraft

**45N** | New Richmond wants and welcomes this added traffic to their airport.

**45O** | The people from this area DO NOT want this expansion..... Just fix what is already there. Be sensible.....

Thank you, James Ulasich, West Lakeland MN.



**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Lake Elmo Airport Expansion Opposition  
**Date:** Tuesday, April 17, 2018 6:54:41 AM

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Monday, April 16, 2018 8:54 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo Airport Expansion Opposition

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](#)

**F:** [612-725-6310](#)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Laura Kaschmitter <[runnerlaura@yahoo.com](mailto:runnerlaura@yahoo.com)>  
**Date:** April 16, 2018 at 8:21:55 PM CDT  
**To:** "[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)" <[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)>  
**Cc:** "Sen. Karin Housley" <[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)>, Kathy Lohmer <[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)>  
**Subject:** Lake Elmo Airport Expansion Opposition

Mr. Leqve –

**46A** | I am opposed to any expansion at the Lake Elmo Airport.

**46B** | I am very concerned about the recent issues with contaminated groundwater. You have stated in the EAW that our wells would not be affected by any construction done at the Lake Elmo Airport. Yet no evidence has been presented as to how this will be prevented. If your plan does not work and our water becomes contaminated what is the plan to fix this? We are not on city water and sewer.

**46C**

| Also, I have always been confused by how the purpose and need of the MAC (unelected officials) is more important than the neighboring municipalities and

**46D** | their elected officials. Our elected officials represent many more people than the small number of pilots at the airport.

Please re-consider this plan and repair the runway in its current position.

**|46E**

Thank you,

Laura Kaschmitter

CC: Mr. Andrew Peek  
Federal Aviation Administration  
6020 28th Avenue, South, Room 102  
Minneapolis, Minnesota 55450

**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Lake Elmo Airport Expansion  
**Date:** Monday, April 16, 2018 8:32:11 AM  
**Attachments:** [Expansion-Improvement.pdf](#)  
[ATT00001.htm](#)

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Monday, April 16, 2018 7:27 AM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>;  
Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo Airport Expansion

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

6040 28th Avenue South

Minneapolis, MN 55450

**O:** 612-725-6326

**F:** 612-725-6310

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** "Elizabeth Buckingham" <[itabit@comcast.net](mailto:itabit@comcast.net)>  
**Date:** April 16, 2018 at 7:23:19 AM CDT  
**To:** <[chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)>  
**Cc:** <[andy.peek@faa.gov](mailto:andy.peek@faa.gov)>, <[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)>, <[sen.karin.houley@senate.mn](mailto:sen.karin.houley@senate.mn)>  
**Subject:** Lake Elmo Airport Expansion

Comment letter.

April 7, 2018

TO: Metropolitan Airport Commission

47A

Now MAC calls its outdated 1965 plan at the Lake Elmo Airport an "improvement", not an "expansion". Why did MAC feel it necessary to rename its expansion, what's the difference? MAC, below are the word definitions.

Expansion: the act of becoming larger or more extensive.

Improvement: an example or instance of improving or being improved.

There's NO question MAC is expecting to do an "expansion".

47B

1. Runways would be lengthened and re-positioned which means larger or more extensive – an improvement would be to resurface the existing runways.

47C

2. By the re-routing of 30<sup>th</sup> Street North with a sharp dangerous curve to lengthen runways would be significantly extensive – rebuilding a road is an expansion.

47D

3. Removal of 20 acres of woodlands is certainly extensive – not a needed improvement.

47E

It's time MAC steps up and tells the world it does not speak truthfully.

Elizabeth Buckingham

cc: Andrew Peek-FAA, Rep. Kathy Lohmer, Senator Karin Housley

47F

PS. I expect a personal written reply from MAC.

**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Lake Elmo Airport comment  
**Date:** Monday, April 16, 2018 8:49:46 AM

---

**From:** Nelson, Dana <[Dana.Nelson@mspmac.org](mailto:Dana.Nelson@mspmac.org)>  
**Sent:** Monday, April 16, 2018 8:47 AM  
**To:** Evan Barrett <[Evan.Barrett@meadhunt.com](mailto:Evan.Barrett@meadhunt.com)>; Leqve, Chad <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>;  
Ralston, Neil <[Neil.Ralston@mspmac.org](mailto:Neil.Ralston@mspmac.org)>; Wilson, Evan <[Evan.Wilson@mspmac.org](mailto:Evan.Wilson@mspmac.org)>  
**Subject:** FW: Lake Elmo Airport comment

FYI

**DANA NELSON**

*Manager – Noise, Environment and Planning*

**Metropolitan Airports Commission**

6040 28<sup>th</sup> Avenue South

Minneapolis, MN 55450

**O:** 612-725-6330

**F:** 612-725-6310

[www.macnoise.com](http://www.macnoise.com)

---

**From:** Richard Weyrauch [<mailto:rick.weyrauch@comcast.net>]  
**Sent:** Sunday, April 15, 2018 8:55 AM  
**To:** [ContactLakeElmoAirportEA <ContactLakeElmoAirportEA@mspmac.org>](mailto>ContactLakeElmoAirportEA@mspmac.org)  
**Subject:** Lake Elmo Airport comment

**48A**

While I do server on the Baytown Board of Supervisors, I am writing as a private citizen in the email that follows. This is **NOT** an official endorsement from Baytown Township.

Dear MAC,

**48B**

I have attended more than one public meeting over the proposed re-work of 21D, both prior to the EA/EAW meetings and for the EA/EAW meetings. While I support the proposed project, I even more so support the findings of the EA/EAW as I believe there will be minimal environmental impact to the local area as a result of this project.

I am however concerned that most of the public comments I heard did not address



**48C**

the EA/EAW specifically, but instead seemed to focus on the general feelings about living near the airport. I cannot see how that should matter when considering the approval of the EA/EAW. I would hope the MAC board understands this too, and will vote to approve the EA/EAW based on the merits of the environmental impact.

**48D**

If personal opinions matter, then I must say that I feel that MAC did not place enough emphasis on the impact to the reconstruction of Manning Avenue if this project were to be postponed or canceled. Our community needs Manning Avenue expanded at the earliest possible time; in fact, it's already too late in my humble opinion. The impact the current runway configuration has on delaying Manning Avenue's expansion is a large concern to our community. In the long run, everyone in this area of Washington County is better served by the approval of this project, and that is what I expect government to do for me.

Richard (Rick) Weyrauch

13310 51st Street N

Stillwater, MN 55082

651-303-9165

**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Unwanted Lake Elmo Airport Expansion  
**Date:** Tuesday, April 17, 2018 6:55:23 AM

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Monday, April 16, 2018 6:31 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Unwanted Lake Elmo Airport Expansion

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](tel:612-725-6326)

**F:** [612-725-6310](tel:612-725-6310)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** L U <[jlranh2@outlook.com](mailto:jlranh2@outlook.com)>  
**Date:** April 16, 2018 at 5:55:04 PM CDT  
**To:** "[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)" <[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)>  
**Cc:** "[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)" <[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)>, "[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)" <[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)>  
**Subject:** Unwanted Lake Elmo Airport Expansion

Dear Mr. Chad Leqve

**49A** | Reagarding the Lake Elmo Airport expansion that most people do not want, that would ruin our neighborhood and would be financially irresponsible...Please listen to the people!

**49B**

**49C** | We are in favor of the MAC "No Action" plan, which would allow the MAC to repair or rebuild the current runways in their current locations and at the current lengths. We are asking the MAC to assume their responsibility as part of this community, in preserving our water resources and neighborhood. Below are many reasons not to move forward with an expansion of Lake Elmo Airport.

**49D**

- |            |                                 |                                    |            |
|------------|---------------------------------|------------------------------------|------------|
| <b>49E</b> | 30th St relocation unsafe       | Further ground water contamination | <b>49F</b> |
| <b>49G</b> | Lack of zoning                  | Major loss of property value       | <b>49H</b> |
| <b>49I</b> | Larger aircraft are unwanted    | Loss and damage to wildlife        | <b>49J</b> |
| <b>49K</b> | Added noise and light pollution | Loss of trees and natural habitat  | <b>49L</b> |

**49M** | There are airports within 20 mi of Lk Elmo that are under-utilized that can accept the larger aircraft

**49N** | New Richmond wants and welcomes this added traffic to their airport.

**49O** | The people from this area DO NOT want this expansion..... Just fix what is already there. Be sensible.....

Thank you, Linda Ulasich, West Lakeland MN.

**From:** [Evan Barrett](#)  
**To:** [Colleen Bosold](#)  
**Subject:** FW: Lake Elmo Airport Environmental Assessment  
**Date:** Tuesday, April 17, 2018 6:55:05 AM

---

**From:** Leque, Chad <Chad.Leque@mspmac.org>  
**Sent:** Monday, April 16, 2018 10:24 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo Airport Environmental Assessment

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](#)

**F:** [612-725-6310](#)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** "Scott Hanson" <[scott.hanson6@comcast.net](mailto:scott.hanson6@comcast.net)>  
**Date:** April 16, 2018 at 10:09:27 PM CDT  
**To:** <[Chad.leque@mspmac.org](mailto:Chad.leque@mspmac.org)>  
**Cc:** <[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)>, <[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)>  
**Subject:** Lake Elmo Airport Environmental Assessment

**50A** | I am a pilot and user of the Lake Elmo airport and support the enhancements and safety improvements being made to the airport grounds.

**50B** | Most importantly, I appreciate the update on the environmental assessment, and the reviews of the environmental areas potentially impacted. It looks comprehensive and thoroughly reviewed in all environmental areas.

**50C** | On a personal note, I wish the improvements would have included the original longer runway and that the improvements would have been completed "yesterday"... but I understand and applaud the MAC's process of obtaining public feedback and comments, and making adjustments to the overall plan to incorporate and mitigate the community's concerns.

**50D**

**50E** | I also hope the MAC will continue to attempt to educate the community and dispel the

|misinformation being spread by potentially emotional public members.

-Scott Hanson



**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Opposition to Lake Elmo Airport Expansion  
**Date:** Tuesday, April 17, 2018 6:54:30 AM  
**Attachments:** [pastedImage.png](#)

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Monday, April 16, 2018 8:54 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Opposition to Lake Elmo Airport Expansion

FYI

**CHAD E. LEQVE**  
*Director of Environment*  
**Metropolitan Airports Commission**  
6040 28th Avenue South  
Minneapolis, MN 55450  
**O:** 612-725-6326  
**F:** 612-725-6310  
[www.MetroAirports.org](http://www.MetroAirports.org)  
[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Mick <[mkaschmitter@hotmail.com](mailto:mkaschmitter@hotmail.com)>  
**Date:** April 16, 2018 at 8:14:13 PM CDT  
**To:** "Chad.leqve@mspmac.org" <[Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)>  
**Cc:** "sen.karin.housley@senate.mn" <[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)>, "rep.kathy.lohmer@house.mn" <[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)>  
**Subject:** **Opposition to Lake Elmo Airport Expansion**

Mr. Leqve –

**51A** I am opposed to the proposed changes at the Lake Elmo Airport as outlined in the LTCP **51B** and further defined in the recent EAW report. The number of planes and operations do not warrant the amount of money being proposed and the hardships to the neighborhood with the moving of 30th St. N.

**51C** It is disappointing to see the continued use of the 26,000 operations per year being used in all reports. It has been noted this is not a correct figure, and more than actual. How this can still be used as part of the justification for the project? I think this is wrong. I am watching the blizzard outside knowing there are no operations being conducted at the LE airport. To get to the 26,000 operations you need 72/day. Every day! When weather does not allow

flying, those 72 flights/day have to be flown on other days, increasing that number. We all know this is not realistic.

In the recent EAW, the following chart was published:

< ☰ ↑ LakeElmoAirport\_Draft\_EA\_EAW\_Report\_February-2018(1) 🔍 📄  
 (VFR) minimums (3 statute mile visibility and 1,000-foot cloud ceiling).

Table 4-1 details estimated aircraft operations by user type and based aircraft by aircraft type for the 12-month period ending October 2016, as recorded in the Airport's FAA Airport Master Record.

Based Aircraft		Itinerant Aircraft Operations		Local Aircraft Operations	
Single-Engine	183	Air Carrier	0	General Aviation	10,621
Multi-Engine	6	Air Taxi	1,147	Military	0
Jet	0	Military	14,561		
Rotorcraft	3	General Aviation	169		
Other (including sailplanes)	0	Local Aircraft Operations	10,621		
<b>Total Based Aircraft</b>	<b>192</b>	Military	0		
			<b>Total Aircraft Operations</b>	<b>26,498</b>	

Source: FAA Form 5010-1, operations for the 12 months ending 10/31/2016

**4.2 Local Population**

Lake Elmo Airport is located mostly in Baytown Township and is bordered by West Lakeland Township to the south and the City of Lake Elmo to the west, all three of which are in Washington County. Population statistics for these four jurisdictions are presented below.

**51D**

What is a military operation? This is a new figure that was not noted in the LTCP. More than half of all operations are now classified as military? What kind of military flights are these? Living close to the airport we have observed a large amount of the flights being student pilots. So are all flights either students or military? So how many are actual pilots with planes based at Lake Elmo?

**51E**

**51F**

Please re-consider and change to the No-Action Alternative.

Thank You,

Mick Kaschmitter

CC: Mr. Andrew Peek  
 Federal Aviation Administration  
 6020 28th Avenue, South, Room 102  
 Minneapolis, Minnesota 55450

**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Lake Elmo Airport Expansion  
**Date:** Tuesday, April 17, 2018 7:35:30 AM  
**Attachments:** [Superfund Clean Act.pdf](#)  
[ATT00001.htm](#)

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Tuesday, April 17, 2018 7:33 AM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo Airport Expansion

FYI

**CHAD E. LEQVE**  
*Director of Environment*  
**Metropolitan Airports Commission**  
6040 28th Avenue South  
Minneapolis, MN 55450  
**O:** 612-725-6326  
**F:** 612-725-6310  
[www.MetroAirports.org](http://www.MetroAirports.org)  
[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** "Elizabeth Buckingham" <[itabit@comcast.net](mailto:itabit@comcast.net)>  
**Date:** April 17, 2018 at 7:31:23 AM CDT  
**To:** <[chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)>  
**Cc:** <[andy.peek@faa.gov](mailto:andy.peek@faa.gov)>, <[rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn)>, <[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)>  
**Subject:** Lake Elmo Airport Expansion

Comment letter.

April 9, 2018

TO: Metropolitan Airport Commission

**52A** | In MAC's 1965 expansion plan of the Lake Elmo Airport, it plans to lengthen runways to the southeast into West Lakeland Township property it took by eminent domain in 1969. There will be enormous excavation work needed causing soil disturbances. The airport property and east to the St Croix River has already been designated as a Superfund Clean Act by the Minnesota Department of Health because of TCE penetrating our wells in Baytown Township so any and all soil movement causes greater harm to neighbors and wildlife habitats. Why is it that MAC has not listed in its EA/EAW that its property is in a designated Superfund Clean Act?

**52B**

**52C** |

**52D** | MAC should cause no additional harm to neighbors and wildlife and its habitats. Rebuild the existing runways "as is" to keep the environmental impact as low as possible to our communities.

Elizabeth Buckingham

cc: Andrew Peek-FAA, Rep. Kathy Lohmer, Senator Karin Housley

**52E** | PS. I expect a personal written reply from MAC.

**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Opposition to Lake Elmo Airport Expansion  
**Date:** Tuesday, April 17, 2018 3:00:31 PM  
**Attachments:** AirPortCommission.pdf

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**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Tuesday, April 17, 2018 12:24 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** FW: Opposition to Lake Elmo Airport Expansion

FYI

Chad

**From:** RICH GERGEN [mailto:richgergen@comcast.net]  
**Sent:** Tuesday, April 17, 2018 11:38 AM  
**To:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Cc:** rep.kathy.lohmer@house.mn; sen.karin.housley@senate.mn  
**Subject:** Opposition to Lake Elmo Airport Expansion

Attached please find a letter expressing my opposition to the proposed Lake Elmo Airport Expansion.



To: Metropolitan Airports Commission  
Re: Lake Elmo Airport Expansion

**53A** | I live in West Lakeland township on 30<sup>th</sup> and Neal Avenue, directly across from the proposed expansion site for the new runway and would like to express to you that I am opposed to the proposed plan for a variety of reasons.

**53B** | I moved to this location approximately 1994. I really love the area because of the duality of living in a rural/semi-rural location but still being very close in to city locations. In 2000 or so we started looking for a new location to build a new house as our family was growing but we found we had the ideal location already so in 2002 we built a new house on the same property, essentially doubling down on our investment in the area.

During the entire time that I've lived here, the airport has been an asset. The airport itself and the small planes that make use of it add a nice ambiance to the area. The proposed expansion puts all that at risk and turns an asset to a liability in my opinion.

**53C** | First, there's what it will do to the landscape. The rerouting of 30<sup>th</sup> street will cause major inconveniences for all of the families that call this area their home, not to mention the destruction of the trees, most of which have already been here longer than I have. On top of

**53E** | that, there's the concern about the wildlife that currently makes that area their home. We enjoy the geese, ducks, deer and other wildlife that is in the area and have sincere concerns with what will happen with them.

**53F** | For me personally, the realignment of the street and the extension of the airport will be right in front of our property. Right now, we look out to a line of trees with an agricultural field on the other side. The extension of the airport across from us will include additional lights for the runway and the destruction of those trees so we will be faced with looking out our window to

**53G** | lighted runways. This also brings the noise much closer to home and will be a much larger annoyance than it is now.

**53H** | In addition to the primary concern as to what it will do to the landscape, there's also the concern about larger planes making use of the airport. People have moved here over the last 50+ years knowing the airport is there, observing the planes, noise level etc. and made the decision to invest in their home. Larger planes are a big part of the concern for the entire area. We've been told that's not the reason for the expansion, but I've learned that much of the information is misleading at best and outright inaccurate in some cases. To wit:

**53J** |

- We were told no taxpayer money would be used, but that is misleading. We've been informed recently that MAC intends to obtain funding from the FAA which is clearly taxpayer money. When asked for clarification they meant Property taxes, but this is a misleading piece of information.

**53K** |

- We were told there are some 25,000 airplane operations each year which I find very dubious. If the airport ran 24 hours a day, 365 days a year that would be one flight

**53D**

**53I**

operation every 20 minutes. Living right across from the airport I can unequivocally tell you that number is not true.

**53L**

- We've been told repeatedly that they are seeking input from the community, but every session I've gone to has been extremely tilted in favor of the expansion. When one of the people in favor of the expansion spoke, they were given deference and agreed with by the panel. When one of the people opposed to the expansion spoke, the panel challenged, countered and discounted those comments. It was clear the panel had already determined what they were going to do and the gathering of input felt like a charade.

**53M**

There also doesn't appear to be a real need for this. I'm not aware of the exact distances involved, but there's the New Richmond airport and downtown St. Paul airport very close by so the fiscal responsibility in spending millions of dollars to expand a runway when there are viable alternatives close by seems very wasteful.

**53O**

**53N**

**53P**

Finally there's what it will do to property values in the area. This whole process has had the appearance of meeting a "Purpose and Need" with an emphasis on Purpose but not so much on Need. It has become clear during the events that I attended the panels were taking into account the desires of less than 200 pilots using the airport and not the community at large. To be clear we're not opposed to making the current airport safe. We're not trying to get the airport to close, in fact we are very much for keeping it open. What we are against is the expansion of the airport being pushed through with what appears to be careless disregard of the impact on the community.

**53Q**

Thank you,

Richard Gergen

**From:** Evan Barrett

**To:** Colleen Bosold

**Subject:** FW: Lake Elmo EA / EAW Comments

**Date:** Tuesday, April 17, 2018 12:09:56 PM

**Attachments:** [Metropolitan Airports Commission Lake Elmo Airport EAW.docx](#)

**From:** Leqve, Chad <Chad.Leqve@mspm.org>

**Sent:** Tuesday, April 17, 2018 12:09 PM

**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspm.org>;

Ralston, Neil <Neil.Ralston@mspm.org>; Wilson, Evan <Evan.Wilson@mspm.org>

**Subject:** FW: Lake Elmo EA / EAW Comments

FYI

[Chad](#)

**From:** Vince Anderson [<mailto:vjanderson@presenter.com>]

**Sent:** Tuesday, April 17, 2018 11:49 AM

**To:** Leqve, Chad <[Chad.Leqve@mspm.org](mailto:Chad.Leqve@mspm.org)>

**Subject:** Lake Elmo EA / EAW Comments

**54A** Mr. Leqve

Attached is a word document of my comments on the Lake Elmo Airport Expansion EA / EAW. I am opposed to the proposed expansion. I find the EA / EAW document missing important information, containing erroneous information, and containing information new to the plan.

Would you be so kind as to acknowledge receipt of this note and attachment so I can be assured it will be addressed,

Thank you in advance

Vince Anderson

email [VJAnderson@presenter.com](mailto:VJAnderson@presenter.com)

phone 651-436-5184

April 17, 2018

Metropolitan Airports Commission Lake Elmo Airport

My comments on the EA / EAW are hereby submitted. Any and all comments are individual statements unless otherwise required for meaning. I request that any of which you may find fault with does not by that action invalidate the others for consideration.

**54B** | I do point out that the notice of public hearing held recently in the area may be defective – a Metropolitan Airports Commission (MAC) newsletter which I received March 22 does not refer to the hearing as for the EA / EAW but for comment on the Long Term Comprehensive Plan (LTCP). The section of the newsletter announcing the hearing is titled **Public hearing set for Lake Elmo Airport's long-term plan** and does not even mention the EA / EAW. Perhaps another meeting is required?

**54C** | The easement mentioned for the existing 30<sup>th</sup> street is a prescriptive easement and there is nothing in Minnesota Statutes which makes any provision for 'extinguishing' an easement as MAC states. The law specifically states the MAC has the power to acquire the land but it is widely acknowledged that MAC is already the owner of the land. See Minnesota Statute 473.608 Subd 2. Perhaps if MAC had taken action after land acquisition there might be an argument but since MAC acquired ownership the public has enjoyed quiet use of the property and MAC has done nothing over the period of its ownership to post their intent the take over the easement. MAC has posted no notice on the easement regarding it being private and subject to the owner's control. MAC has quietly permitted the road to be maintained and improved at public expense. MAC has at no time closed the road to break continuous use by the public. In addition it has been acknowledged by MAC at public meeting that this would be the first time MAC has crossed a governmental boundary which may present yet another impediment.

**54D** | MAC also indicates that they would seek a land release from the FAA to allow realignment of 30<sup>th</sup> street. MAC at no time during the review process has mentioned this release or its need which should be understood by all concerned and should have been discussed during the review process for the plan. I suggest the plan (LTCP) should go back through the approval process after this need has been determined and discussed.

**54E** | Chapter 2, Page 2-1 refers to 'needs' when these are not 'needs' but instead potentially wants. If the expansion was a true need the airport could not function in its define role today and in the past half century. It is only the declared potential desire to accommodate larger aircraft that seems to be driving the 'need.'

**54F** | Page 2-4 discusses 'airplanes that will regularly use it' in reference to weight restrictions. The number of weight restricted flights discussed during the public hearing process was in

single digits annually. The specific aircraft that would be restricted have not been appropriately defined.

**54G** Table 2.2 on Page 2-6 needs to have a column identifying the number of these specific aircraft which are based at Lake Elmo (21D).

**54H** Table 2-3 on Page 2-8 refers to crosswind requirements. As was pointed out in the long term plan, the heavier aircraft are better capable to use the crosswind runway, and I submit that runway could be extended ON AIRPORT beyond what is planned to accommodate these and other heavier aircraft. The crosswind could be the longer runway.

**54I** Page 3-2 Paragraph 3.2.1 refers to incompatible land uses in the RPZ. It should be noted that MAC allowed the construction of a dike and runoff water retention pond in the existing RPZ west of Manning without taking any action to curtail that construction.

**54J** Page 3-3 refers to the transportation aspects of 21D. I submit that 21D is NOT a transportation airport or real reliever to MSP. It is a sport flying airport, with minimal if any commercial use. It is seriously doubted that any based aircraft would apply to MSP for the ability to base there should 21D be restricted. 21D is NOT the only airport in Washington County. Forest Lake Airport (25D) is fully capable of handling many of the aircraft which use 21D today. MAC doesn't reference it presumably because they don't own it.

**54K** The drive time discussion on page 3-4 is new to this EA / EAW and was not part of the Long Term Comprehensive Plan as approved. Introducing that discussion and purported facts should require a public comment period and reapproval of the plan. I understand that West Lakeland will be taking issue with the drive times displayed. On this same page it refers to Lake Elmo (21D) in supporting regional economies. The traffic counts and categories described later in the document refute the use of 21D as presented. 21D is a

**54M** PRIMARILY a sport / recreational field at the time when 'private' aircraft use is diminishing as reported by MAC in the April 1 issue of the St. Paul Pioneer Press.

**54N** I do not understand why the DRAFT LTCP plan is being referenced beginning on page 3-6. This document we are supposed to be reviewing is the EA / EAW for the APPROVED plan. Presenting this information opens it back up to requiring new approval.

**54O** I do point out in the final paragraph on the page that MAC says the 'legacy' alternative of expanding the primary runway has been shown for several decades. What MAC neglected to mention (lack of candor?) was that extension of the primary in the previous Long Term Comprehensive Plan was deemed to be beyond the 20 year time period of that plan!

**54P** The unidentified figure on the page following 3-8 is unreadable. Identified numbered landmarks are not explained and the legend is cut off on the left. Note there is also no scale on this figure as would be common.

**54L**



**54Q** | The paragraph at the bottom of page 3-21 refers to MAC starting to convene a zoning board during the EA / EAW process. Isn't this long overdue? Shouldn't MAC have been involved in this with the communities a long time ago? Housing has been built in the impacted area. It is important to note the property south of 30<sup>th</sup> street, owned by MAC for over 50 years, has never been zoned airport. MAC simply hasn't been 'minding the store.'

**54R** | Throughout the discussion of the alternatives in the section on Tree Removal the number and species and approximate age of the trees should be specifically identified. Note on page 3-23 there is a discussion of the No Action Alternative. In this section MAC identifies 13 acres of trees needing to be removed. Note again that Mac simply has not been maintaining the existing airport as required. Why should grant money (the expected means of funding the changes) be used to perform routine maintenance that MAC hasn't elected to perform? One should also note the fence (installed with funding from Homeland Security I

**54S**

**54T** | understand) has not been maintained and now contains trees that have grown through the fence. This is evident along both 30<sup>th</sup> street and along Neal Avenue. You should note throughout the document that tree removal (20 acres or more) is identified and there is no recognition that the MET Council 20 year plan (Thrive) identifies trees as an important resource and are to be saved. Clear cutting especially is to be avoided.

**54U**

**54V** | I will make a single statement on wetlands for all the alternatives. Almost every figure showing wetlands is different. Of significant importance is the northern boundary of the wetland and standing water south of 30<sup>th</sup>. The platting book at Washington County shows an additional diagram that was not presented. MAC uses the term flooding. Flooding is a technical term and is used only when water exceeds the Natural Ordinary High Water (NOHW). If there has not been an NOHW determined, and I surmise there hasn't, then that needs to be the first step. Various ordinances and rules define the necessary setback for any construction (e.g. road). It very well may not be possible to construct the planned revised 30<sup>th</sup> street.

**54W**

**54X** | Sure, it is a minor point, the legend associated with Figure 4-3 is wrong. It appears the RPZ and MAC Property designations are reversed.

**54Y** | The chart, Table 4-1, on page 4-5 is disturbing. First it should be noted that this is all new data. MAC at no time in the past identified any Military use of the field. MAC again exhibits a lack of candor. Note that all the counts on traffic are estimates and as such I ask if estimates are really in the FAA Master Record as identified and reported? The estimates are derived according to MAC by using the noise monitoring system and then estimated the total by comparing the 'observed' data with actual (from a field with a control tower – Anoka County I believe) and adjusting, What does this mean? It means that MAC takes a known false number and adjusts it arbitrarily based on difference between observed and actual at another facility. There is no justification made of using Anoka County. We have no idea if using a different airport, e.g. St. Paul Downtown or Crystal or MSP itself, for the adjustment factor would have resulted in higher or lower number at Lake Elmo. MAC in open meeting indicated that they would recommend the runway lengthening regardless of the traffic

**54Z**

- counts (itself an absurd statement – an airport not being used would get this significant planned investment?). How on earth did MAC determine that over half the traffic is military?
- 54AA** | Can you really tell that based on noise data? How can these estimates be presented to 5 significant digits? Folks, that's false statistics! (To the reader: If you don't understand the issue of significant digits I respectfully request you contact someone who does, have them review the entire traffic counts section and comment.) Note in their chart MAC identifies no Air Taxi by local aircraft. Military deserves another mention. Certainly this significant use by military is easily moved and likely would be better suited at some other airport outside MAC with less potential interference with flight operations at the major relievers and MSP.
- 54AC** |
- 54AD** | On page 4-8 there appears to be some sort of error in reporting. Twin Point Tavern and Gorman's are on Stillwater Boulevard. Perhaps it would be helpful to all reading this for the locations to be better defined. I suggest that owners of these dining establishments ought to be paying for mention? Is there a reason some were not mentioned? What point is MAC trying to make identifying 2 restaurants by name rather than just saying restaurants? Why was Lake Elmo Inn not mentioned?
- 54AE** |
- 54AF** | The Washington County Fairgrounds are NOT a mile north of the airport. The airport property extends north to 40<sup>th</sup> street and across 40<sup>th</sup> from the airport are the fairgrounds. The fairgrounds would be in the common traffic pattern for departure. The fairgrounds area is used frequently during the warmer weather not just at the county fair time. Why would MAC falsify the distance?
- 54AG** | Figure 4-5 has several dark areas which are not in the legend.
- 54AH** | On page 4-12, Paragraph 4.4.4 does not appear to be applicable any more. I understand that Washington County has turned over zoning to the local municipal governments except in certain circumstances. Perhaps I am mistaken,
- 54AI** | Seeing the chart on page 4-20 reminds me that the document needs to have a chart showing required setback from the wetlands for any construction as defined by VBWD, State of MN as applicable, Washington County, West Lakeland Township, MN-DNR and perhaps others.
- 54AJ** | I believe Figure 4-8 is wrong. The wetland south of 30<sup>th</sup> is shown in various maps as extending all the way to 30<sup>th</sup>. Note for example figure 4-9.
- On page 4-22 in the first paragraph there is some discussion of flooding. Note my previous statement about NOHW.
- 54AK** | In the last line of Wetland 4 the term hydrology is used. I clearly do not understand the point the author is trying to make. Hydrology is a scientific study. The sentence implies something else.

**54AL** | On page 4-27 in the middle the maintenance staff person is used as the resource on bird strikes? Read that as 'the guy who plows the snow and mows the grass.' Is this individual the MAC responsible person to count bird strikes? Was any contact made to the FAA who request pilots to report all bird strikes? What is the means of recording the maintenance person uses? Are they even recorded? If so where? The whole bird strike discussion seems less than professional and I believe new to the discussion as opposed to being brought up in the development of the LTCP.

**54AM** | It should be noted somewhere in this document that MAC has traditionally allowed hunting on MAC property south of 30. This has meant vehicle parking in the RPZ in addition to the actual hunting activity.. Does MAC plan to allow this use in the future

**54AN** | Table 5-1 on page 5-2 requires clarification and explanation. Is the reduction or increase a result of changes in the mix of aircraft or changes in the number of flights or some combination. Why would some emissions increase while others decrease? The variation in emissions is counter intuitive. Certainly this deserves explanation. Use of a model without meaningful comments on the results and their implication represents incomplete research.

**54AO** | While MAC states the limit (100 tons) for construction emissions these is nothing stated for the ongoing emissions as a result of air (or vehicle) traffic.

There also ought to be an analysis of vehicle emissions and the changes as a result of lengthening 30<sup>th</sup> street. Note especially that this added length applies to all traffic including diesel buses and heavy duty vehicles.

**54AP**

**54AQ** | The chart 5-3 on page 5-4 ought to include the census for each species to be removed.

On page 5-10 just ahead of paragraph 5.7 there is a discussion of farmland converted as part of the preferred alternative. Note the calculated point value for the converted acreage. I submit that MAC has failed to count the acreage used for hay production which has taken place at 21D. The entire length of the new runway and new taxiway would no longer be available for this farming activity. I believe inclusion of this area would increase the point value over the threshold.

**54AR**

**54AS** | Page 5-12 discusses the airport zoning board. Note this board or an equivalent defined under Minnesota Statute 360 should have the required zoning already in place. MAC is again deficient in performing its duties. The sentence in the 2<sup>nd</sup> paragraph after 5.9.1 references deviation from the Model Zoning Ordinance. I submit this whole sentence is 'eye wash' – sounds important but doesn't say anything.

**54AT** | Page 5-13 discusses 30<sup>th</sup> street. Considerable important data are missing, A full explanation of when and detailed counts of the traffic study are not included. I can find no mention of the extra road length which would be necessary when calculating vehicle emissions.

**54AU**

**54AV** | 'Undue' (as in undue burden) is a word difficult to define and quantify. Is MAC asking the pilots or the people using the road if there is an undue burden? Is this Mead and Hunt's perception of burden based on their limited if ever use of the road? A 'little' burden

multiplied by a large number of impacted drivers and passengers is not 'little.' In addition, adding turns in both directions increases the likelihood of accidents when compared with the current straight road. Mead and Hunt, and MAC should be able to quantify that based on available traffic design standards and accident statistics.

**54AW**

**54AX** | At the top of page 5-14 it discusses deer. I submit much deer movement is during night or twilight. How did MAC come to a different opinion?

**54AY** | The noise discussion starts on page 5-16. Note first that MAC uses a different noise model than used in the previous submission of the LTCP. Discussion of why a different model was chosen is necessary. The discussion is incomplete without this important information. You should note that the second to the last paragraph on page 5-16 states that the noise model is based on user supplied data without a chart of as to what that data is and why those specific parameters were chosen. The reader is required to accept the data generated on

**54AZ**

**54BA** | faith. Does MAC make any assumptions regarding aircraft age and expected turnover to a newer fleet (translate as quieter)? MAC should show how the fleet has (or has not) changed over time.

**54BB**

**54BC** | Nowhere does MAC calibrate the tool with field observations and measurements, something easy to do and important to do but not done.

On page 5-17 section 5-12 MAC again discusses the easement and suggests providing the local government with an interest in the changed location. Note they do not say they are going to do that, or that it would be determined following the completion of the EA / EAW.

**54BD**

**54BE** | Note also that MAC claims nothing in current law prevents MAC at some time in the future taking that easement and using all the property as airport with no road!

I ask the reader to have the noise contour charts, figures 5-1, 5-2, and 5-3 to follow this next discussion. Note first that the shape of the contours is considerably different than those presented in the approved LTCP. MAC has apparently chosen a different tool providing different results. Certainly there needs to be an explanation of that choice as well as the parameters used.

**54BF**

Measure the distance from the end of the runway to the 'point' at the southern most contour on Figure 5-1 and its respective distance on Figure 5-2. Note that the distance is less on Figure 5-2. Why? The announced variable on the charts is time – year 2015 (or 16?) vs. 2025. The missing information is important so that it may be verified.

Now measure that same distance on Figure 5-3 and compare it to your distance on Figure 5-2. Note again the distance is less on 5-3 with NO announced difference other than the new runway. I accuse MAC of doctoring the parameters to achieve a satisfactory result. This appears again to be a lack of candor / integrity on MAC's part.

**54BG**

On page 5-21 in the second to the last paragraph MAC uses the term 'likely' when discussing the impact of lighting on residential areas. Likely is a term hard to measure.

**54BH** | Note also in this paragraph the discussion MAC uses the term 'sometimes' when considering adding baffles or solid fence. Certainly with MAC's expertise in airport operation they would have a more definitive discussion of this impact. I submit that solid fencing is a less desirable option and it results in visible pollution 24 hours a day, 7 days a week.

**54BI** | I disagree with the conclusion(s) and statements reached in the first paragraph on page 5-22. Airport location is more likely determined by the beacon rather than runway lights, and when a pilot is on final that pilot is more likely to be considering a safe landing rather than worrying about reducing intensity of runway lighting.

**54BJ** | There is no discussion of the likely impact on vehicle traffic suddenly encountering the high intensity lights when traveling the revised 30<sup>th</sup> street. I submit this could contribute to an accident. The vehicle driver has no control over or notification of when the high intensity lights are illuminated.

**54BK** | When considering the buffer between the impervious surface and a wetland more permits for setback will likely be necessary beyond just VBWD and MDNR as I pointed out earlier. This is specifically in relation to the changed location of 30<sup>th</sup> street.

**54BL** | I doubt the calculation of 'Grassy Area' increasing on Table 5-5 (Page 5-25) especially in light of construction of a longer cross wind runway, a new primary runway and a new full length taxiway over land now 'grassy.'

**54BM** | Page 5-28 in the 2<sup>nd</sup> paragraph ahead of paragraph 5.14.3 there is a discussion of planting trees. It seems trees are generally incompatible with airport operation.

In paragraph 5.14.3 itself I point out again that 'flood' is a technical term and requires definition of an NOHW. MAC needs to explain what term is better and what they mean by it.

**54BN** | Based on my discussion of noise previously and what appears to be falsification of noise contours I object to 'None' as the determination of noise impacts in Table 5-8 Page 5-32.

**54BO** | In conclusion, based on the amount of new data, changes in methodology and questionable presentation I submit that the plan itself (LTCP) ought to go back for revision and approval and further I request that a full EIS be prepared even if a new LTCP is not ordered.

Vincent J. Anderson

1815 Hillside Ct.

West Lakeland, Minnesota 55082



**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Comments on Lake Elmo Airport Expansion  
**Date:** Tuesday, April 17, 2018 3:15:28 PM  
**Attachments:** [Stephen Buckingham comments on Lake Elmo Airport Expansion.pdf](#)  
[ATT00001.htm](#)

---

Colleen,

Here's another public comment. Let me know how you're keeping up with logging these and, if not, how I can help. Thanks!

**R. Evan Barrett, AICP | Planner, Aviation Services**

Mead & Hunt, Inc | 7900 West 78th Street, Suite 370 | Minneapolis, MN 55439

Main: 952-941-5619 | Mobile: 612-597-4262 | Direct: 952-641-8820

[evan.barrett@meadhunt.com](mailto:evan.barrett@meadhunt.com) | [www.meadhunt.com](http://www.meadhunt.com)

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Tuesday, April 17, 2018 2:50 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Comments on Lake Elmo Airport Expansion

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

6040 28th Avenue South

Minneapolis, MN 55450

**O:** 612-725-6326

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[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** "Stephen Buckingham" <[swbuckingham@comcast.net](mailto:swbuckingham@comcast.net)>  
**Date:** April 17, 2018 at 2:45:45 PM CDT  
**To:** <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>  
**Cc:** <[Andy.Peek@faa.gov](mailto:Andy.Peek@faa.gov)>, <[sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)>, 'rep.' <[kathy.lohmer@house.mn](mailto:kathy.lohmer@house.mn)>  
**Subject:** Comments on Lake Elmo Airport Expansion

Chad,

Here are my comments on the proposed expansion.

Steve Buckingham

April 17, 2018

To: Metropolitan Airports Commission

Re: Lake Elmo Airport Expansion

**55A** | I live in Baytown Township and I am opposed to the proposed plan to expand the Lake Elmo Airport for numerous reasons. I will describe a few of them below.

**55B** | In the early 1990's we were told that there had been a plan to expand the Lake Elmo Airport but that the then current usage did not justify the expenditure. Now the number of flight operations at the airport are fewer than in 1990 and are projected to reduce further in the future but we are told that expansion is necessary. This is an unjustified and unnecessary expenditure of millions of dollars.

We have learned many times during this process that we cannot trust statements made by MAC. For example MAC has repeatedly told us that no taxpayer money would be used on the expansion of the Lake Elmo Airport. During one meeting of the CEP both MAC representatives and pilots at the meeting asserted that all funding would come from user fees charged to persons using the Lake Elmo Airport. Commissioner Madigan repeated this claim in a private conversation following the Public Hearing on April 4. This claim is untrue for at least two reasons. First MAC intends to obtain funding from the FAA. That is clearly funded by federal taxpayers. In that private conversation Commissioner Madigan again stated that all MAC funds came from airport user fees but when pressed on the subject he admitted that those funds included passenger fees charged to those using commercial airlines out of MSP and not just pilots using the Lake Elmo Airport. No doubt these fees also include fees charged to airlines using MSP that are also reflected in ticket prices. Those are all certainly taxes. Mr. Madigan said that he was only referring to property taxes. That's a very limited view of what is a tax. When Mr. Madigan and I were classmates in law school we were required to take classes in tax law and those were not limited to, or even primarily directed to, property tax. He should know that there are taxes other than property taxes. As others have said, the pilots at the Lake Elmo airport are asking passengers on commercial flights at MSP to help pay for their hobby in Lake Elmo.

**55D**

MAC established the Community Engagement Panel ("CEP") with the ostensible purpose of obtaining input from the community. I have been a member of the CEP. The problem

**55C**

is that MAC had decided what it wanted to do before the CEP was established. At the first meeting we were told the "Purpose and Need" for the airport expansion. They were clearly set up such that MAC's chosen outcome was the only possible one to meet them. Those Purpose and Need only take into account the desires of less than 200 pilots using the airport and not the community residents. We were not given a chance to have input into or even comment on the Purpose and Need.

55E

55F

The only part of the Purpose and Need that addressed the interests of anybody other than airport users was number 2 under Purpose that stated "Enhance safety of airport users **and the general public**" [emphasis added]. Unfortunately MAC's proposal does just the opposite of this. 30<sup>th</sup> Street is a well travelled, unlighted, country road. After a snowfall the snow on 30<sup>th</sup> Street is quickly packed down and the street will remain snow and ice packed for days or even weeks depending on the temperatures. Driving on it even as now configured can be a frightening experience. Introducing a hairpin curve with a relatively steep hill will significantly increase the danger for the general public driving on this street. This effect will be exacerbated by the increased snow drifting that will be caused by MAC's removal of 20 acres of trees. Thus MAC's plan does not meet its own stated Purpose.

55G

55H

Finally as a concerned citizen and a member of the CEP representing Baytown Township, I have been heavily involved in this process. At the CEP we were, at times, allowed to comment on the plans, but those comments were ignored. MAC officials have refused to answer straightforward questions and have answered others with half truths that omitted important details. At the public hearing on April 4 the final speaker stated that the project for the expansion of the Lake Elmo Airport has been the most transparent that MAC has ever undertaken. That may well be true but, if it is, that should not be taken as a compliment to how MAC has handled this matter but rather as a condemnation of how MAC has operated in the past.

  
Stephen W. Buckingham

cc: Andrew Peek, FAA  
Senator Karin Housley  
Representative Kathy Lohmer

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 8:16 AM  
**To:** Sarah Emmel  
**Subject:** Fwd: My input

Sent from my iPhone

Begin forwarded message:

**From:** "Nelson, Dana" <[Dana.Nelson@mspmac.org](mailto:Dana.Nelson@mspmac.org)>  
**Date:** April 19, 2018 at 8:12:06 AM CDT  
**To:** "Wilson, Evan" <[Evan.Wilson@mspmac.org](mailto:Evan.Wilson@mspmac.org)>, Evan Barrett <[Evan.Barrett@meadhunt.com](mailto:Evan.Barrett@meadhunt.com)>, "Ralston, Neil" <[Neil.Ralston@mspmac.org](mailto:Neil.Ralston@mspmac.org)>, "Leqve, Chad" <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>  
**Subject:** FW: My input

**DANA NELSON**

*Manager – Noise, Environment and Planning*  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue South  
Minneapolis, MN 55450  
**O:** 612-725-6330  
**F:** 612-725-6310  
[www.macnoise.com](http://www.macnoise.com)

---

**From:** Cliff Wells [<mailto:majorgeeke@gmail.com>]  
**Sent:** Wednesday, April 18, 2018 6:32 PM  
**To:** ContactLakeElmoAirportEA <[ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org)>  
**Subject:** My input

**56A**

I am writing this letter to state why I feel the airport commission needs to go ahead with their current plan.

I know that there are a lot of naysayers that would like nothing better than for us to relocate to New Richmond, or just cease to exist completely.

I would remind them that the airport was there before they were and as a reliever airport for MSP, its needs are justified.

**56B**

The runway lengthening is badly needed for both runways. As it is now, there have been times on a winter night when I had to land after everyone was home for the night and because of low hanging clouds



56D

(which is often the case), I had to do a GPS approach to rwy 32 and accept a tailwind for landing because the low clouds didn't allow me to circle to land on rwy 14 (which the winds did favor). And in the winter, that is a scary prospect. What is badly needed as well is usable instrument approaches to all of the runways. Currently there is just the GPS 32 and (ADF 04 which is an antiquated system that most new aircraft don't even have the capability to utilize)...my Cirrus aircraft as an example. With the FAA moving forward with the NextGen concept and all of the computer capabilities that are now afforded them...there really isn't much of a reason to not have GPS approaches to all of the runways. There was an individual at the last meeting that complained about noise. This is totally unacceptable. Those new homes that have been built and those that are still being built have absolutely no grounds to stand on and belly ache about noise. When they moved in, unless they drove to their new place with horse blinders on, there is no way they missed the fact that they were buying a home next to an airport. And the developers, I'm sure to cover their own butts, made sure there was some sort of clause in the purchase agreement acknowledging the near by airport.

As a side note, I'd also like to voice a complaint about the person or persons that bought the old Valters maintenance hanger at the end of Interstate Lane. Why is it being allowed for them to allow a semi tractor trailer to park in his space as well as boats, campers, trailers and half a dozen cars. It looks worse than a shabby used car lot. And sometimes there is a Chevy Suburban that parks so close to the taxiway that I have to take a different alley just to get out to the runway. And there are a couple of racecars that are parked there as well and those guys occasionally go racing down the taxiways like they're at the dragstrip. Why is this being allowed ??

--

Cliff Wells  
Hgr 31F  
Lake Elmo Airport

--

Sent from [Postbox](#)

56C

April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Ave S  
Minneapolis, MN 55450

Dear Mr. Leque;

- 57A** | I am writing in response to the Lake Elmo Airport Expansion in which I am totally against and to the re-routing of 30<sup>th</sup> Street due to the airport wanting to lengthen runway 14/32 in which the airport would have the potential of bringing larger aircrafts & additional helicopters to this recreational airport. At one
- 57C** | of the MAC informational meeting it was said they don't monitor what flies in or flies out so a larger airplane or jet could fly in. **57B**
- 57D** | I am asking for the study and data that supports the claim that MAC has stated that this improvement has monetary advantages to West Lakeland residences? What about the potential loss of home value
- 57F** | our home will be located in "Zone A"? What about the noise and runway lights that will be aimed at my house since you will have cut down trees that block it today? With the runway lengthen we will be 700 feet closer to the end of the runway and by removing trees and disrupting the habitat which includes many deer, coyotes, foxes, many kinds of birds and other small animals where will they relocate? **57E**  
**57G**
- 57H** | I have concerns about the potential water runoffs from these runways that could potentially put chemicals in our wells. We are very concern about our drinking water as it is because most residents in and around the airport are already having their wells tested every couple of years because we are in a well advisory area due to (TCE). What kind of guaranteed do we have that by disrupting the land around our homes that these contaminates won't find their way into my well that so far is free of TCE? Also since chemicals such as deicing, fuels & other cleaners are used at the airport now & with the potential of having larger airplanes at this airport housed there how are we guarantee over the years these chemicals will not show up in our wells? **57I**
- 57J** | We built 31 years ago understanding that the airport was here and that the acreage around our home was yet not developed. Back than I could ride my horses on Neal Avenue & 30<sup>th</sup> Street as this is my hobby, however, over the years the land was develop, more cars drove down our street and it was no longer safe for me to ride on the street so I had to make a change and find alternatives if I wanted to continue my hobby. I did not go to the township and request that they change roads, or stop developing because of my hobby. I don't have a problem with pilots wanting to enjoy their hobby of flying airplanes however I do not believe that I should have to subsidize their hobby or one's flying business. If they don't feel safe landing their airplane at Lake Elmo Airport there are other airports within 20 miles. Those being New Richmond and Holman Field, these airports could easily satisfy their needs without much effort. **57K**
- 57L** | Why spend so much of our tax money on just a few pilots?
- 57M** | I especially feel that government funds that goes towards this project to only benefit the few pilots at the cost of many taxpayers does not warrant this expansion particularly when there is an airport that is 30 some minutes away. When a representative from the Chambers of Commerce of New Richmond stands before you at a Public Hearing on April 4<sup>th</sup> and stated that their airport could handle the request made by your pilots for a longer runway.

Denise Cornell  
2733 Neal Ave. N.  
West Lakeland, MN 55082

**From:** Evan Barrett  
**To:** Colleen Bosold  
**Subject:** FW: Lake Elmo Airport Expansion  
**Date:** Wednesday, April 18, 2018 8:48:53 AM  
**Attachments:** [treated neighbors.pdf](#)

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**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Wednesday, April 18, 2018 8:48 AM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** FW: Lake Elmo Airport Expansion

FYI

Chad

**From:** Elizabeth Buckingham [<mailto:itabit@comcast.net>]  
**Sent:** Wednesday, April 18, 2018 8:47 AM  
**To:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Cc:** [andy.peek@faa.gov](mailto:andy.peek@faa.gov); [rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn); [sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)  
**Subject:** Lake Elmo Airport Expansion  
Comment letter.

April 12, 2018

TO: Metropolitan Airport Commission

58A

I am writing this to let the public know that MAC has treated neighbors surrounding the Lake Elmo Airport who oppose its 1965 expansion plan with arrogance and condescendence. It is reflected by the majority of the pilots' unprofessionalism towards neighbors. I keep remembering an airport meeting I attended in 2016 at Baytown Township Town Hall when a senior MAC representative (now retired) pointed his finger in the face of a friend of mine while I stood next to her telling her there will be no negotiations on the expansion. It was offensive and unnecessary. I have also witnessed MAC's behavior at Community Engagement Panel ("CEP") meetings. When residents were allowed to ask questions Mead & Hunt's response was that topic was already addressed and moved on by saying there will be no further discussion on that. The whole purpose of the CEP was to address issues from both sides and that was clearly not done. Instead, MAC presented its Purpose and Need and never deviated. It was unfortunate to hear this was MAC's first CEP since its inception at the Public Meeting on April 4, 2018. MAC has a nationwide reputation for having the worst communications skills with the public of any airport management authority in the country.

58B

58C

58D

When we moved to the St Croix Valley we did research the airport and inquired if there was any possibility of it becoming larger and everyone told us that would never happen. Even at MAC meetings throughout the 90's it abandoned its expansion plans. We respect the existing airport; as is, but, lengthening runways and bringing in larger aircraft will disrupt our communities. If the aging pilots want an expansion, they should pay for it themselves. My user fees at MSP will be used to fund this ridiculous expansion plan and I adamantly object. FAA funds used on this expansion plan are also my taxpayer money.

58E

58F

Pilots choosing to hangar at the Lake Elmo Airport knew of the runway length when they signed up. The airport was built in 1951. Homes

**58G** | have been encroaching towards the airport ever since. We all know there is Holman Field in St Paul and the New Richmond, Wisconsin airport for use if pilots feel it necessary to have longer runways within a short drive distance. Re-routing and building a sharp dangerous curve on 30<sup>th</sup> Street North, a major access route, to accommodate pilots is wrong by endangering the neighbors unnecessarily with worsened roadways. **58I** | MAC should keep its Expansion within its current fenced footprint.

**58H**

Elizabeth Buckingham

cc: Andrew Peek-FAA, Rep. Kathy Lohmer, Senator Karin Housley

**58J** | PS. I expect a personal written reply from MAC.



To: Metropolitan Airports Commission

Re: Lake Elmo Airport Expansion

**59A** As a resident of West Lakeland Township, I am adamantly opposed to any expansion and/or improvements of the Lake Elmo Airport that would extend past the land that is currently fenced or disrupt surrounding properties in any way. Since the expansion has been in the LTCP for many years, it is clear that the MAC should have moved forward many years ago. The window of opportunity has passed. In the meantime, the area continues to become more densely populated thanks to mandates from the MET Council and the airport is now basically landlocked. This proposed expansion/improvement may be considered by some as relatively small, but it does not make sense because there simply is not enough room here to do so, nor it is not fiscally responsible. There must be planes that are safe to use on the current runway lengths, or there would be no airport, period. MAC has stated on numerous occasions that the goal of this expansion is not to attract more or larger planes.....that said, the current use of the airport does not warrant the expansion proposed by MAC not to mention the waste of fiscal dollars and the disruption to the community. This project is budgeted to cost \$11.5 million which is unjustifiable given current usage of this airport, the continuing decline of hobby pilots. If the runways can be lengthened within the current fenced area, perfect, otherwise, rebuild the ones that are currently deteriorating to keep the pilots, and for that matter, surrounding residents safe. Then let any pilots, especially those of larger aircraft take advantage of the other nearby FAA Airport options that are already set up for their use.

**59B**

**59C**

**59D**

**59E**

**59F**

**59G** This my third letter to go on record in opposition to the proposed expansion and/or improvements at the Lake Elmo Airport, the first dated and submitted September 16, 2015, the second, March 9, 2016. I know there are still many residents that are unaware of this proposal. There are other neighbors that feel there is no way MAC would move ahead with such a preposterous project, so they have not followed the matter. I, on the other hand along with some of whom are much more involved, have continued to spend uncountable hours away from my family, be it collecting and comparing information or consistently attending meetings regarding this expansion be it in the neighborhood, at the Town Board, County Board, MAC led presentations, privately meeting with MAC representatives, or attending Listening Sessions. It has been an uninvited burden-but one of most significance. I am modeling to our children how to be present, involved, informed, and ultimately to stand up for what is right.

**59H** This whole process has been crowned as MAC being transparent and inclusive of all stakeholders. It is true that they have held listening sessions, community presentations, created the CEP, sent out letters, updated their website, etc. of which I understand is unprecedented, but their procedures are still falling short. They have not listened to the voices of opposition, they have misrepresented and skewed data, and avoided direct answers. Even worse they are forging ahead and trying to mitigate opposition by taking advantage of the political power and lack of accountability of their organization. The only stakeholders to gain benefit from this expansion are the MAC itself and a handful of pilots that use this airport. I expect there are other entities involved, maybe even government, that will benefit somehow-maybe even something to do with the widening of Manning Avenue and other area improvements, only they know. That said, I have been raised to trust government and appointed committees. I was raised to know they are good people of whom are well educated and will do what is right for the majority. Well, I am honestly beginning to second guess that premise as I am raising our family and find myself becoming more and more involved in our community. Honestly, I am fearful as I have seen first hand that sadly, the adage of "follow the money" seems to stand true. I would honestly like to be able to continue to believe and trust the former.

59I

I am also writing as a concerned resident. I heard Mr. Patrick Flemming, a speaker at the latest listening session, share his story and I have become troubled. He identified himself as a Lake Elmo resident, a pilot of a Cherokee 6 and is a regular user of the Lake Elmo Airport. According to Mr. Flemming, he can not take off here under certain circumstances with a full tank of fuel at the Lake Elmo Airport due to the short length of the airstrip. He stated he will not land anywhere without a minimum runway length of 3000 feet, but he uses this airport because he knows it so well. This is not keeping safety first. As a pilot, it is his responsibility to follow protocol and full safety measures. It is the his responsibility to land at an airport that offers runways that fall within the guidelines of the particular aircraft and which he feels safe, not just familiar. There should not be any craft on site or utilizing the Lake Elmo Airport, or any airport, for that matter, if they are doing so without keeping safety first. The pilots that utilize the Lake Elmo Airport and house their aircraft here were fully aware of the limitations of the facilities when they decided to do so. A want or wish does not create a need. No pilot should not be using this airport if their craft is not designed for use at the current set up. Mr. Flemming's speaking out also raises my question of how many other pilots are so negligent with their personal safety as well as the surrounding neighbors? What is done from the MAC perspective to truly assure safety for all?

59J

MAC has outlined their "PURPOSE and NEED" for this project which was which has driven this projected expansion/improvement. The real facts have been difficult to find regarding the usage of this particular airport to substantiate any real need. MAC has stated that there are some 25,000 operations each year, including the flight school touch and goes. If this airport ran 24 hours a day, 365 days a year, that would be one flight operation every 20 minutes. Given the honored hours for airport usage are much shorter, that only increases the numbers per hour, which I can honestly say is not the case. As far as hangar use, I believe we were told by MAC that there are only about 200 crafts housed on site. I simply do not understand how the hobby of a few can have so much bearing on an entire community.

59K

59M

It is clear the MAC's PURPOSE is biased to mainly to attract more flights and pilots and then to improve the airstrip for safety at the same time. MAC does seem to be expanding their vision to larger aircraft and business flights and increased usage of this airport to keep it sustainable and viable, yet they claim this is not the case. There have been recent articles in local papers stating that the hobby of flying has been decreasing exponentially, and the use of MAC airports continues to decline. Being there are other airports within a reasonable vicinity that are already fully equipped to facilitate any planes that are not safely serviced by the current layout, there is no true NEED to make such changes to this little airport. New Richmond, being one of the best options has been publically vocal about their desire to welcome any new air traffic and pilots, and planes. They are seeing increased use of their facility, and since there are federal monies at stake, feel the dollars would be better utilized there as they are also seeking FAA dollars for improvements.

59L

59N

59O

The "NEED" actually seems to lie in dollars somewhere. I am in no way educated in politics, but it is clear that this entire project is politically based and biased-but to whom, I am unsure. I do know it is not biased in any way toward the citizens that reside here, nor to the pilots that that simply want the current runways upgraded and repaved within the currently fenced area for safety, nor those that enjoy the small airport for it's nostalgic and hobby feel and count on safe airspace for newly licensed pilots to practice and hone their skills. I also know for a fact that not all pilots agree with the view that extending runway length will make it safer for all because an increase in air traffic and variance of aircraft using the runways will cause other safety issues.

59P

59Q

My husband has owned our 5 acre property on the corner of 30th Street and Neal Avenue since around 1994. When he purchased here, he saw the Lake Elmo Airport as an asset to the area. He asked about the future of the airport, and was told unequivocally that it would stay within the currently occupied space. We were married in 1999, and as our family grew, we looked into moving but ultimately decided to build a new larger home on the same property. Before building, we once again inquired with city planners regarding the airport before making another significant financial

investment. Since then, the perimeter fencing was installed surrounding the airport, which seemed to solidify the communications. Then in July of 2015, what seems out of nowhere and completely by happenstance, we heard of this LCTP expansion/improvement proposal in which not only would the airport and runways expand, but the road we travel on multiple times each day would be significantly altered to accommodate that improvement. In lieu of utilizing the new hairpin curve on 30th Street, the traffic will likely be thwarted onto thoroughfares in the adjacent neighborhoods which were not built to accommodate such high usage. The rural view of trees and wildlife will be cleared to facilitate a new runway. This new runway would not only be visible out the front of our home where we currently enjoy a peaceful view, but it will also be lit and strobed. I can not imagine this type of adjustment to landscape will improve our property value in any circumstance, which buy the way, we are counting on for our future endeavors for our family. Actually, I have recently been made aware by realtors of projections of a 20% decline in property value if this expansion happens. We don't want to move. Our brother in law built our home full of love. This is the home and property of which we plan to stay in until retirement, and possibly one day, pass down to our children. We love the small hobby planes and culture the Lake Elmo Airport brings. It is a great addition to the neighborhood. We do NOT, however, agree with it OVERTAKING the neighborhood nor endorse this expansion that is unwarranted and muchly disruptive to the area and community in which we chose to raise our family. I remain hopeful that there is one person of whom will become aware of this situation and do the right thing. That one person will be the right one to put a stop to the push and unnecessary and irresponsible spending of federal dollars and put a halt to the Lake Elmo Airport expansion once and for all. Is that person you?

Thank you,

Lori Gergen  
Wife to Richard, mom to Janelle (Dan), Meghan (Josh), Raif (13), Kahlan (112), Peightan (10) and Rhyse (7)  
2939 Neal Avenue North  
Stillwater, MN 55082  
651-261-1160  
Inooner@comcast.net

cc: Chad Leqve, MAC  
Andrew Peek, FAA  
Senator Karin Housley  
Representative Kathy Lohmer

**To:** Sarah Emmel  
**Cc:** Colleen Bosold  
**Subject:** Fwd: Lake Elmo Runway Expansion Comments  
**Date:** Wednesday, April 18, 2018 11:44:23 AM  
**Attachments:** [img001.pdf](#)  
[ATT00001.htm](#)  
[img002.pdf](#)  
[ATT00002.htm](#)

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Sent from my iPhone

Begin forwarded message:

**From:** "Nelson, Dana" <[Dana.Nelson@mspmac.org](mailto:Dana.Nelson@mspmac.org)>  
**Date:** April 18, 2018 at 11:40:06 AM CDT  
**To:** "Leqve, Chad" <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>, "Wilson, Evan" <[Evan.Wilson@mspmac.org](mailto:Evan.Wilson@mspmac.org)>, Evan Barrett <[Evan.Barrett@meadhunt.com](mailto:Evan.Barrett@meadhunt.com)>, Colleen Bosold <[Colleen.Bosold@meadhunt.com](mailto:Colleen.Bosold@meadhunt.com)>, "Ralston, Neil" <[Neil.Ralston@mspmac.org](mailto:Neil.Ralston@mspmac.org)>  
**Subject:** FW: Lake Elmo Runway Expansion Comments  
**DANA NELSON**  
*Manager – Noise, Environment and Planning*  
Metropolitan Airports Commission  
6040 28th Avenue South  
Minneapolis, MN 55450  
**O:** 612-725-6330  
**F:** 612-725-6310  
[www.macnoise.com](http://www.macnoise.com)

**From:** John Regenold [<mailto:jregenoldoutdoorsman@gmail.com>]  
**Sent:** Wednesday, April 18, 2018 11:23 AM  
**To:** ContactLakeElmoAirportEA <[ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org)>  
**Subject:** Lake Elmo Runway Expansion Comments



## Public Comment Form

Lake Elmo Airport Environmental Assessment

Public Hearing, Oak-Land Middle School Auditorium, April 4, 2018

**BY FILLING THIS IN, YOU AKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND  
MAY BE INCLUDED IN A PUBLIC DOCUMENT.**

Completed forms can be:

1) Left with us at the public hearing;

2) Sent via email to [ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org); or

3) Sent via mail to:

Lake Elmo Airports EA/EAW  
c/o MAC Environment Development  
6040 28th Avenue South  
Minneapolis, MN 55450

Written comments will be accepted until Thursday, April 19, 2018 at 5:00 PM. All written comments received during the comment period will become part of the project record.

Name:

John Regenold JR.

Address:

545 Ryan Ave W, Roseville, MN 55113

Hello,

60A

Let me first start off by saying that I am in support of the runway expansion at Lake Elmo.

60B

I have been flying out of lake elmo airport for the past 20 years. I believe that this expansion is necessary to improve safety for both pilots and the surrounding community.

Please use the back side of this form for additional comments.

More information about the plan can be found at: [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx)



April 13, 2018

TO: Metropolitan Airport Commission

**61A** Why has FAA allowed MAC to lease acreage for agricultural use on properties it owns and operates as an airport in Lake Elmo? Certainly you've heard of Captain Sully of American Airlines landing on the Hudson River story. There are *FLOCKS* of birds on your property when corn or other crops are planted. Year round there are migratory birds on MAC property feeding off of the crops and also because of the wetlands and woodlands. Your 1965 expansion plan has expired and you've abandoned the plan previously. MAC took property south of 30<sup>th</sup> Street North in West Lakeland Township by eminent domain in 1969 and has never used it in 49 years other than to allow more crop leasing and habitat for wildlife. That property should rightfully be returned to the previous owner.

**61B**

**61D** We've explained our concerns about our homes being devalued by your actions and by the re-routing of 30<sup>th</sup> Street North but you don't listen to our major road access or devaluation issues. MAC doesn't care about its neighbors, it cares about itself. All MAC has ever done is tell us what it claims it needs, never listening to neighbors. None of the MAC personnel live in our communities of Baytown Township, West Lakeland Township or the City of Lake Elmo, as Bridget Rief, Vice-President, pointedly told us at the West Lakeland Township meeting in early 2016 at Oak-Land Middle School. After the meeting I spoke with Commissioner Madigan and I asked where he lived, he said Woodbury and that he flies out of the Lake Elmo Airport. With that said, Mr. Madigan should never have been allowed a vote on the expansion.

**61E**

**61F** Another example of MAC's uncaring attitude reflects on what the cyclone fencing looks like along 30<sup>th</sup> Street North. You recklessly don't take care of it like you do the cyclone fencing on the west side of your property along Manning Avenue North. Now you say you want to place a privacy wall on the south side of 30<sup>th</sup> Street North but we are not

looking forward to what that may look like if it's installed or how it will be maintained.

**61G**

I also remember a severe storm hit our area and there was storm damage done to hangars at the Lake Elmo Airport and winds blew a lot of airport debris to property south of 30<sup>th</sup> Street North. We also had storm damage on our property. Did MAC go out and clear the hangar debris...no. It was an eyesore sight until neighbors picked up the ditch/shoulder debris on MAC's property. Does this reflect MAC is a good neighbor?

**61H**

MAC says no salt is used at the Lake Elmo Airport but it's building a salt storage shed with my taxpayer monies. When questioned about the salt storage shed and the usage of salt at the airport, MAC officials clarified themselves by saying salt is not used on runways. Later the same officials said, in private conversations, that salt will be used on the roadways allowing it to then leech into the already contaminated soil?

Elizabeth Buckingham

cc: Andrew Peek-FAA, Rep. Kathy Lohmer, Senator Karin Housley

**61I**

PS. I expect a personal written reply from MAC.

**From:** Evan Barrett  
**To:** Sarah Emmel  
**Cc:** Colleen Bosold  
**Subject:** Fwd: Lake Elmo Runway Expansion Comments  
**Date:** Wednesday, April 18, 2018 11:44:23 AM  
**Attachments:** [img001.pdf](#)  
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[ATT00002.htm](#)

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**From:** "Nelson, Dana" <[Dana.Nelson@mspmac.org](mailto:Dana.Nelson@mspmac.org)>  
**Date:** April 18, 2018 at 11:40:06 AM CDT  
**To:** "Leqve, Chad" <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>, "Wilson, Evan" <[Evan.Wilson@mspmac.org](mailto:Evan.Wilson@mspmac.org)>, Evan Barrett <[Evan.Barrett@meadhunt.com](mailto:Evan.Barrett@meadhunt.com)>, Colleen Bosold <[Colleen.Bosold@meadhunt.com](mailto:Colleen.Bosold@meadhunt.com)>, "Ralston, Neil" <[Neil.Ralston@mspmac.org](mailto:Neil.Ralston@mspmac.org)>

**Subject: FW: Lake Elmo Runway Expansion Comments**

**DANA NELSON**

*Manager – Noise, Environment and Planning*

**Metropolitan Airports Commission**

6040 28th Avenue South

Minneapolis, MN 55450

**O:** 612-725-6330

**F:** 612-725-6310

[www.macnoise.com](http://www.macnoise.com)

**From:** John Regenold [<mailto:jregenoldoutdoorsman@gmail.com>]

**Sent:** Wednesday, April 18, 2018 11:23 AM

**To:** ContactLakeElmoAirportEA <

**Subject:** Lake Elmo Runway Expansion Comments



**Public Comment Form**

**Lake Elmo Airport Environmental Assessment**

Public Hearing, Oak-Land Middle School Auditorium, April 4, 2018

**BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND MAY BE INCLUDED IN A PUBLIC DOCUMENT.**

Completed forms can be:

- 1) Left with us at the public hearing;
- 2) Sent via email to [ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org); or
- 3) Sent via mail to:

Lake Elmo Airports EA/EAW  
 c/o MAC Environment Development  
 6040 28th Avenue South  
 Minneapolis, MN 55450

Written comments will be accepted until Thursday, April 19, 2018 at 5:00 PM. All written comments received during the comment period will become part of the project record.

Name:

JOHN J. REGENOLD

Address:

545 W. RYAN AVE. ROSEVILLE MN.  
55113

62A

62B

Hi,  
 I just wanted to send off a note to let you know how important Lake Elmo Airport is to me & our family. We hope you fly out of Shadepark since the late 1960s & supported the FBOs family businesses. \* Safety is always a concern & Runway expansion would be very welcomed, and a great improvement for pilots & the surrounding community. Our family has a hangar on the field, & we support EAA & Fly Young Eagles.

\*  
 THANK YOU  
 John Regenold

Please use the back side of this form for additional comments.

More information about the plan can be found at: [www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx](http://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx)

April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Ave S  
Minneapolis, MN 55450

Dear Mr. Leque;

- 63A** | I am writing in response to the Lake Elmo Airport Expansion in which I am totally against and to the re-routing of 30<sup>th</sup> Street due to the airport wanting to lengthen runway 14/32 in which the airport would have the potential of bringing larger aircraft & the flight path closer to our home. This airport has been perceived and used as a recreational airport for the past 31 years that we have lived in West Lakeland. **63B**
- 63C** | The MAC representatives have said they do not monitor what nor do they control what flies in or out of the airport.
- 63D** | How is it that MAC updates a long term comprehensive plan, expecting the townships to just ok it and change zoning around the airport when the airport is no longer compliant with the zoning already established for 60 years? The townships long term comprehensive plans are the ruling documents at the local level not the other way. Why is it that MAC never attended any planning meetings or public hearings when land around the airport was being developed? **63E**
- 63F** | How is it that MAC has spent almost a million dollars preparing for this long term comprehensive plan, having an Environmental impact study done prior to the plan being accepted by the townships? Why is it that MAC started this plan/project back in 2013 long before coming to the townships to indicate a change from previous plans? Where's the cost analysis to prove this is good use of FAA money when **63G**
- 63H** | the airport population has been declining for the past 30 years? Where is the data to prove the statement that larger aircraft won't come to the Lake Elmo Airport after completion? MAC does not have that data, but should have data to support once the airport runway is lengthened, larger aircraft will come to Lake Elmo. **63I**
- 63J** | How can MAC claim the longer runway is needed for safety of the existing users of the Lake Elmo Airport? If it's not safe for the pilots now aren't they in danger of personal injury now? How is it that MAC can claim the local neighbors are safe today when pilots claim it's dangerous to fly out from Lake Elmo Airport? Isn't it the pilots' responsibility to themselves and others to fly safely? If the need for safety is the primary issue, then why has MAC not managed the based aircraft for proper size nor the transient aircraft using the airport for safe operations but allowed miss use? How can MAC put over 1500 users of 30<sup>th</sup> street at risk with a multi curved road where a straight 50MPH road exists today as a major township road for commuting to and from work every day?
- 63K** | Why is it that MAC believes this is not expansion, adding lighting to a non-lit runway, Adding terminal lighting for night operations, Adding more taxis ways, constructing run-up locations near neighbors to name a few new additions that create noise, light pollution that is neither present today nor consistent with the voluntary noise abatement in place today? All of these new additions indicate flight operation expansion heavier use, more noise and disruptive to the neighbors.
- 63L** | Why it is that MAC can ignore state rules for safety zones wouldn't MAC want to be compliant to both state and federal rules?
- 63M** | MAC needs to provide a detailed cost analysis of each alternative in detail, the claim is cost to airport residents is substantial, how much? Provide detailed cost return on investment analysis for the federal



- 63O** | money to acquire property over the life of the airport improvements over the life of the airport? Provide the cost benefit between closing and just provide minimal updates? Wouldn't actually closing generate a significant financial benefit for MAC to return this unused land back to the owners, 640 acres as prime real estate in the metro area is a substantial dollar amount in land alone, on the order of 256 2.5 acre home sites at a rough retail cost of \$200,000 each is \$51.2 million plenty to assist the current residents of the airport to move to different airports? | **63N**
- 63P** | My last comments: The MAC planning team and upper management has been poor neighbors for the past 30 years. The only time they come to our town meeting is to bring planning changes that are not welcome with any consideration to the neighborhood. The pilots at Lake Elmo for the most part are considerate, although there are a few who don't stay in the zones, fly low, wait till late to do night take off and landings to name a few. The transient users are helicopters from down town to do practice; all they do is create noise, loud noise even at late hours with no regard to neighbors and MAC does nothing about it. MAC has a noise complaint web site but you have never provided statistics on how many complaints or done the research to see who is creating the noise, why is this? | **63Q**
- 63R** | | **63S**
- 63T** | I truly believe this project is to bring larger aircraft to Lake Elmo in an attempt to keep it from closing because of continued low of airport users of the past 30 plus years. The days of this plan for expansion is long gone, like 60+ years past. It wasn't needed in 1969 it's not needed now with even fewer users. MAC needs to realize this plan is obsolete and the cost of almost a million dollars was a waste and they should accept the existing size, classify as recreational or close it. Rebuild the existing runways if needed but remove the onsite helicopter support, keep the trees to minimize the light pollution, a solid fence that is proposed is just a bad eye sore. MAC does not even maintain the existing chain link fence; look at the one on 30<sup>th</sup> street and Neal. This does demonstrate MAC's management does not support this airport being maintained. That is why the runways are in poor condition and only now attempting to justify sending money on the Lake Elmo Airport by expanding the services to accommodate or attract larger aircraft and keep it in the MAC reliever system. MAC should return this airport to MNDOT for management where it can be maintained and follow state rules. | **63U**
- 63V** | | **63W, 63X**
- 63Y** | | **63Z**
- 63AA** | | **63AB**

Brad Cornell  
 2733 Neal Ave. N.  
 West Lakeland, MN 55082

**Sarah Emmel**

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 1:47 PM  
**To:** Sarah Emmel  
**Subject:** Fwd: Lake Elmo Airport

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Sent from my iPhone

Begin forwarded message:

**From:** "Leqve, Chad" <[Chad.Leqve@mspm.org](mailto:Chad.Leqve@mspm.org)>  
**Date:** April 19, 2018 at 1:21:49 PM CDT  
**To:** "[evan.barrett@meadhunt.com](mailto:evan.barrett@meadhunt.com)" <[evan.barrett@meadhunt.com](mailto:evan.barrett@meadhunt.com)>, "Nelson, Dana" <[Dana.Nelson@mspm.org](mailto:Dana.Nelson@mspm.org)>, "Ralston, Neil" <[Neil.Ralston@mspm.org](mailto:Neil.Ralston@mspm.org)>, "Wilson, Evan" <[Evan.Wilson@mspm.org](mailto:Evan.Wilson@mspm.org)>  
**Subject:** FW: Lake Elmo Airport

FYI

Chad

**From:** Lynette Spitzer [<mailto:tallbichonlady@gmail.com>]  
**Sent:** Thursday, April 19, 2018 11:13 AM  
**To:** Leqve, Chad <[Chad.Leqve@mspm.org](mailto:Chad.Leqve@mspm.org)>  
**Cc:** [andy.peek@faa.gov](mailto:andy.peek@faa.gov); [rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn); [sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn)  
**Subject:** Lake Elmo Airport

Dear Mr. Leqve,

- 64A** | I am opposed to the runway expansion at Lake Elmo Airport for the following reasons:
- Encroachment of runways onto 30th Street and Manning Avenue
  - Rerouting and/or possible vacating of 30th Street. | **64B**
  - 64C** | • Loss of trees and natural habitat.
  - Added noise and/or noise pollution. | **64D**
  - 64E** | • More noise and light pollution forcing development of a new noise and light abatement policy.

**64F** | I am requesting that you acknowledge my concern(s), reconsider your chosen options, and resolve to work with the resident and pilot communities to come to a reasonable and agreed upon solution toward the future of Lake Elmo Airport.

Respectfully submitted,

Lynette Spitzer  
2654 Neal Ave N  
West Lakeland Township,  
MN 55082

## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 3:13 PM  
**To:** Sarah Emmel  
**Subject:** FW: airport expansion

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**From:** Leqve, Chad <Chad.Leqve@mspm.com>  
**Sent:** Thursday, April 19, 2018 2:08 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspm.com>; Ralston, Neil <Neil.Ralston@mspm.com>; Wilson, Evan <Evan.Wilson@mspm.com>  
**Subject:** Fwd: airport expansion

FYI

### CHAD E. LEQVE

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](tel:612-725-6326)

**F:** [612-725-6310](tel:612-725-6310)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** Lynette Spitzer <[tallbichonlady@gmail.com](mailto:tallbichonlady@gmail.com)>  
**Date:** April 19, 2018 at 10:21:07 AM CDT  
**To:** [chad.leqve@mspm.com](mailto:chad.leqve@mspm.com)  
**Cc:** [rep.kathy.lohmer@house.mn](mailto:rep.kathy.lohmer@house.mn), [sen.karin.housley@senate.mn](mailto:sen.karin.housley@senate.mn), [andy.peek@faa.gov](mailto:andy.peek@faa.gov)  
**Subject:** airport expansion

To: Metropolitan Airport Commission

**65A**

My name is Tamra Roth, I am the daughter of John and Lucille Higbee, who owned the West Lakeland Township acreage MAC took by eminent domain action in 1969. You have done nothing with what you took from my family in 1969. Other family members and I live on the remaining West Lakeland Township property and we are totally opposed to any airport expansion.

**65B**

**65C**

The rerouting of 30th Street North will adversely devalue our properties, directly affect my business and endanger our safety. Only rebuild the existing runways within the current fenced footprint.

**65D**

Tamra Roth  
cc: Andy Peek, FAA  
Representative Kathy Lohmer

Senator Karin Housley



## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 3:13 PM  
**To:** Sarah Emmel  
**Subject:** FW: Lake Elmo Airport comment

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Thursday, April 19, 2018 2:07 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo Airport comment

FYI

### CHAD E. LEQVE

*Director of Environment*

**Metropolitan Airports Commission**

6040 28<sup>th</sup> Avenue South

Minneapolis, MN 55450

**O:** 612-725-6326

**F:** 612-725-6310

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** [dibuchek@comcast.net](mailto:dibuchek@comcast.net)  
**Date:** April 19, 2018 at 1:59:34 PM CDT  
**To:** [Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)  
**Subject:** Lake Elmo Airport comment

Mr. Chad Leqve,

I attended the hearing on the proposed Lake Elmo Airport expansion at Oakland Middle School, Lake Elmo on April 4, 2018. I read a statement at the meeting and left my statement and questions with the recorder. After the meeting I asked a representative about the impact of the expansion on the residential parcels with structures. I did not understand what legal impact, perhaps zoning, expansion of the home, and /or safety, they would have and still am not completely fully informed. This is important for all of us to understand as the No-Alternative site impacts 2

**66A**

parcels, Alternative B is 15 and for Alternative B1 it is 13 parcels. Please clarify the legal implications for these landowners now and in the future? How will this impact the surrounding cities?

**66B**

I continue to feel this expansion is incorrect for a number of reasons.

Ann Bucheck  
2301 Legion Avenue  
Lake Elmo MN 55042  
[djbucheck@comcast.net](mailto:djbucheck@comcast.net)

April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Hi Chad,

I posted the following announcement on our area "Next Door" website:

**Lake Elmo Airport Comments**

Hello everyone. As promised, here are the addresses to send your written letters of comment regarding the expansion at Lake Elmo Airport to the MAC.

Via electronic mail to:

Via postal mail to:

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28th Ave S  
Minneapolis, MN 55450

You may private message me if you would like assistance writing a comment.

Thank you for your participation.

Enclosed are the original hard copies of the letters from several individuals who requested help writing a letter. They do not want their personal information published in the final documents regarding LTCP 2035 for the Lake Elmo Airport. If the MAC intends to respond to each comment, please respond to my contact information below and I will see that the responses get to them:

Mary Vierling  
2825 Neal Ave N  
Stillwater MN 55082  
sonny\_jim@msn.com

April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**67A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

It seems that the proposed expansion / improvements for Lake Elmo airport has had millions of dollars spent on it's necessity since 1965 when it was first introduced. This plan is 53 years old and the MAC planners still can't decide if there should be 2, 3 or 4 runways, lengthen the main, leave the main and lengthen the crosswind, etc., etc., etc.

**67B**

Its no wonder with such indecisiveness that, not only is there not a clear plan on what to do with the "runt" in the MAC nest, MAC can't see their way clear to adopt zoning, bring in sewer and water, clearly classify the airport as utility, intermediate or reliever, or utilize their "gifted" power of eminent domain to keep homes, businesses, cars and trains out of their safety zones.

**67C**

MAC staff and pilots frequently ask residents, "Did you know the airport was there when you built or bought your home?" Residents would ask, "Did you know there was a railroad on the north boundary and a road on the south boundary when you built your runway in 1950? Why would you purchase or take land by eminent domain north or south of those pre-existing transportation corridors? It seems that this airport was not built in the right farmers' field back in the 50's. MAC planners were pretty short-sided in the dream of expanding from crop dusting planes to micro-jets.

**67D**

It's time to lay this plan to rest and call it a day for this airport. I would request that the "No Action" option be adopted and future plans for development of this airport be suppressed permanently. This airport can and will accommodate all single propeller aircraft and helicopters in the 12,500 lb. classification as is.

**67E**

Thank you.

Respectfully submitted,



April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**68A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

There will be a definite loss in home values for those of us living within a mile of the airport. The 2015 home values near the airport are:

**68B**

1 mile radius: 348 parcels valued at \$ 93,997,000.00 and,  
2 mile radius: 2103 parcels valued at \$ 823,642,900.00

These totals do not include the developments of Easton Village, Village Preserve, Northport, Artisan, or Royal Club. I do believe the state of MN has statues in place to compensate homeowners for loss of value created by the expansion of the Lake Elmo airport. The state of MN also supports compensation for loss of trees, wild prairie areas, etc., that would reduce property values.

**68C**

**68D**

What originally started at 204 planes at Lake Elmo per MAC at the beginning of this LTCP period in June of 2015 is now down to 182 in January of 2018. That is a drop of about 11%. 182 is the projected total of aircraft for 2035. More pilots will leave with the mandatory addition of the ADS-B transponder system in 2020.

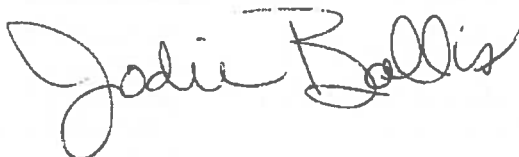
This expansion is not worth the total disruption of the communities. Lake Elmo airport is very likely to fade itself out over the next 15 year period.

**68E**

I am requesting that you acknowledge my comment and concerns regarding the MAC's 2035 LTCP Revised Plan B. I would also request that the "No Action" option be reviewed and considered as the only viable option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations.

**68F**

Respectfully submitted,





April 17, 2018

Chad Leqve, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**69A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

**69B** | If the MAC proceeds with their Revised Plan B for Lake Elmo airport, longer runways will mean larger planes. Unfortunately, per the manufacturers of the planes listed in the MAC 2035 LTCP, the projected runways still won't be long enough and the airport users and residents will be in the same situation we're all in today.

**69C**

**69D** | If the number of pilots and planes (in the 12,500 lb. category) were at capacity at Holman Field, it would make sense to look at other airports to take up the overload, but that is not the case. It does not make fiscal sense to keep repeating expansion projects at airports where twin-engine props and larger planes don't exist. Economic sustainability is based on supply and demand. If nearby airports have the amenities that larger aircraft need, i.e., longer runways, lighted runways, zoning, larger RPZ's, even control towers, then planes larger than single engine props should reside there. That is a pilots first rule of safety, "don't fly into an airport that can't support your plane or that you're not comfortable flying into".

**69E**

Given the amount of federal and state grant monies requested for this project, it is just common sense that it would be more cost effective to divert the category II and III aircraft to airports already built to handle their size per the manufacturer.

**69F** | I think its time that the MAC "No Action" option be adopted as the only option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations.

Respectfully submitted,



April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**70A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

In the early 1990's, TCE was discovered on Lake Elmo airport property. The primary source was identified as the old machine shop in Lake Elmo. The Lake Elmo airport property was included in the super fund cleanup for TCE .

Today there is new PFC water contamination from 3M that has expanded into the city wells in Lake Elmo as well as the residential wells in West Lakeland.

**70B**

How can Mead and Hunt do an environmental study and conclude that there are no environmental impacts?

How can the MAC, in good conscience, approve the Mead and Hunt EA/EAW? Does the MAC think they are immune to the MDH and MPCA declared advisories? Where is the responsibility to the residents and the airport users?

**70C**

I am requesting that you acknowledge my comment and concerns regarding the MAC's 2035 LTCP Revised Plan B. I would also request that the "No Action" option be reviewed and considered as the only viable option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations. This will accommodate all single propeller aircraft and helicopters in the 12,500 lb. classification.

Respectfully submitted,



April 17, 2018

Chad Leqve, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**71A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

The President's report dated May 16, 1952 states that an airport is to have a clear zone of 1000 feet wide by ½ mile long as a safety clear zone at the end of the runway, pages 7-9. This is also enforced by the State of MN and MnDot Avionics.

**71B**

Clearly, the Lake Elmo runways were constructed in such a way that they encroached onto 30<sup>th</sup> St. and the railroad from its inception on the original purchased acreage. Flip the coin. When the MAC purchased or took by eminent domain, the 40 acres north of the airport and the 80 acres south of the airport, keep in mind that the road and the tracks were already there. The railroad and townships did not encroach on the airport, the airport encroached on the townships and railroad.

Maybe it's time for the MAC and the FAA to acknowledge that this expansion doesn't make sense for the airport.

**71C**

Please acknowledge my comment and concerns and revert to the "No Action" option for Lake Elmo airport.

Thank you.

Respectfully submitted,



April 17, 2018

Chad Leve, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**72A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

Once you remove 20+ acres of trees, you will be subjecting everyone within a one mile radius to the noise and light pollution that is generated by the airport.

**72B** | One of the things that makes this airport enjoyable is that you can watch the planes fly without hearing them or dodging the strobe lights (give or take the few pilots who don't follow the quiet takeoff rules.).

**72C** | Larger, louder planes, with no natural buffers in place will change the footprint of our communities. We purchased our homes in a rural area to be away from the lights and noise of the city. And now you want to turn Lake Elmo airport into a mini

**72D**

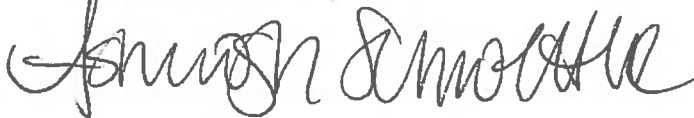
**72E** | Holman field? If there was a huge need for airport space, we could be more understanding, but the numbers of pilots, students and planes are declining rapidly and nothing is rapidly leaping in to take the place of the vacated spaces, planes and pilots.

**72F** | This expansion doesn't make sense for this airport. It only hurts our home values, natural resources, and peace of mind.

**72G** | Please acknowledge my comment and concerns and revert to the "No Action" option for Lake Elmo airport.

Thank you.

Respectfully submitted,



April 17, 2018

Chad Leqve, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**73A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

In 1943, airports were first authorized by MN state law to enact zoning. In 1973, airport zoning was made a condition for receiving federal and state funding. Yet, this has never been done at Lake Elmo airport.

**73B** | If zoning had been done by 1973, we wouldn't be participating in this expensive exercise again for a 50 year old outdated plan that the MAC seems to feel a need to continually resurrect at the taxpayers expense.

This airport is and can only continue to exist for hobbyist pilots flying single propeller driven planes and helicopters in the 12,500 lb. category. This airport has been non-compliant regarding zoning since its beginning. Please refer to the President's Airport Commission enacted in 1952.

**73C**

**73D** | Please acknowledge my comment and concerns regarding the MAC's 2035 LTCP Plan B. I am requesting the "NO ACTION" option be reviewed which allows restoration of the existing runways at their existing length and location. Thank you.

Respectfully submitted,





April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**74A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

**74B** | The proposed expansion will disrupt 30<sup>th</sup> Street, the land that is contaminated with TCE which will affect our wells, the natural habitat, both plant and wildlife that

**74D** | depend on that property to survive. It will bring in noise and light pollution, larger

**74G** | planes that, even with longer runways will struggle to take off and land here.

**74H** | It's time to call for responsibility on the part of the MAC and the pilots who use Lake Elmo airport. For those who need longer runways, you knew the runway lengths when you chose to house and operate your aircraft here. If you're not comfortable with the amenities that Lake Elmo currently offers, you need to move before something happens to you and those of us who don't fly.

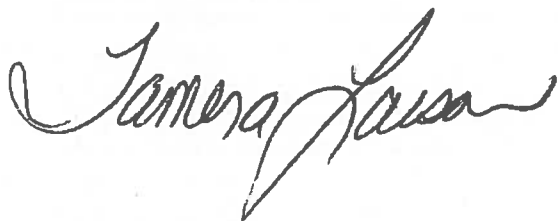
**74I** | We chose to live near this airport because we enjoy single engine propeller driven planes. What we don't need is this kind of disruption in our long time settled communities.

| **74J**

**74K** | Please acknowledge my comment and concerns regarding the MAC's 2035 LTCP Revised Plan B. I would also request that the "No Action" option be reviewed and considered as the only viable option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations. This will accommodate all single propeller aircraft and helicopters in the 12,500 lb. classification. I would also like to request that Lake Elmo is removed from any further expansion or "enlarging" improvement plans going into the future.

Thank you.

Respectfully submitted,



April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**75A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

**75B** | According to the EA/EAW report, Mead and Hunt has declared that 20+ acres of trees will be removed from airport and residential property to accommodate "clear" runway protection zones and the MAC has approved this action.

**75C** | One of the most endangered species likely on the property (we won't know until they come out of hibernation in June) is the Rusty Patch Bumble Bee. They live in the trees and are known to this area. Birds that were never addressed in the EA/EAW report are the metropolitan protected Sand Crane and Trumpeter Swans. There are many species of animals that live on this property. We the people encroach on them, not the reverse. Because of the rural residential location of the Lake Elmo airport, it is important that the airport community be respectful of the protected and non-protected habitat within their perimeter. The balance between man and nature must be recognized and observed.

**75D**

**75E** | I am requesting that you acknowledge my comment and concerns and that the "No Action" option be reviewed and considered as the only viable option for Lake Elmo airport.

Thank you.

Respectfully submitted,



April 17, 2018

Chad Leqve, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**76A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

Lake Elmo currently accommodates aircraft in Category I, which are small single engine propeller driven aircraft weighing 12,500 lbs. or less, and all helicopters

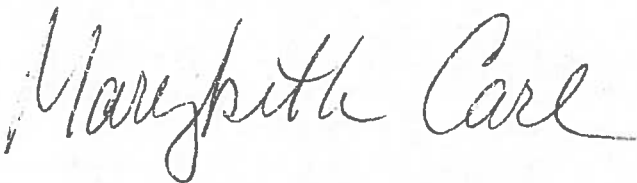
**76B** | Holman Field, which is in the Metropolitan Airports System, is under utilized. It is located less than 20 drive miles and 15 nautical miles away from Lake Elmo Airport. Holman was not considered as a viable alternative in the Metropolitan Airports Commission LTCP 2035.

Fleming Field in SSP and Forest Lake airports also have runways in excess of 5000 feet and are within the same distance as Holman from Lake Elmo airport. All of these airports have runways and facilities capable of accommodating the <sup>1</sup>Category II and III aircraft in the 12,500 lb. class of aircraft that MAC would like to attract to Lake Elmo.

**76C** | New Richmond airport, 16 nautical miles from Lake Elmo airport in WI also has runways capable of accommodating the Category II and III aircraft in the 12,500 lb. class of aircraft. New Richmond is very willing to accept the air traffic in the Category II and III classifications of 12,500 lbs. or less per FAA guidelines. In fact, they hosted approx. 40 personal aircraft in this category and larger during the Super Bowl event. With the opening of the St Croix River Crossing Bridge, New Richmond is looking forward to the interstate commerce that can be created and shared by both Minnesota and Wisconsin.

**76D** | I am requesting that you acknowledge my comment and concerns regarding the MAC's 2035 LTCP Revised Plan B, review and re-evaluate the chosen option, and commit to a reasonable and agreed upon solution that will benefit both the residents and pilots within the Lake Elmo airport communities.

Respectfully submitted,



<sup>1</sup> Category II and III aircraft are identified as:

II: Small Twin Engine Propeller Driven Aircraft weighing 12,500 lbs. or less III: All other aircraft.

April 16, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**77A**

Water quality has always been an issue in the east metro. Water quality surrounding and under the Lake Elmo Airport has led to a well advisory restriction in the surrounding communities. Several homeowners have had to install water filtration systems. The Lake Elmo Airport, itself, has been designated as a Superfund site for TCE contamination. The proposed addition and construction of a new runway would definitely increase and impact surface water runoff. This water, in turn would possibly create a potential change in the groundwater absorption and groundwater saturation for the karst land surrounding the Lake Elmo Airport.

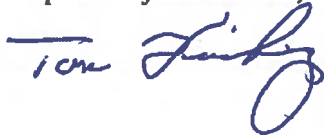
**77B**

The proposed construction of a new 3500 ft. runway, 635 ft. to the east, would put the new flight pattern directly over the existing residential neighborhoods. This is a continuation of moving, shrinking, and redirecting existing safety zones. To accomplish this, it will necessitate building a new 30<sup>th</sup> street with a hairpin curve thus creating additional obstacles not presently existing.

**77C**

The proposed extension of the crosswind runway will lessen the degree of residential safety and shorten the protection zone for residents in Lake Elmo and Baytown. Just because a safety zone exists does not mean a failed take off or landing will end up in that zone. This proposed runway expansion and relocation is not of any benefit to the surrounding communities...

Respectfully submitted,



April 17, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

**78A** | I am **OPPOSED** to runway expansion at Lake Elmo Airport.

30<sup>th</sup> Street is the boundary road between Baytown and West Lakeland Township. It is a minor contributory road that carries approximately 1700 cars per day.

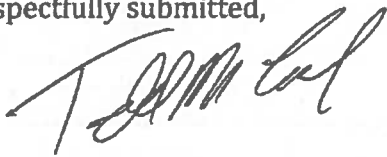
MAC's Revised Plan B will re-direct 30<sup>th</sup> St to the south around a major wetland, through unstable soil. No soil borings have been done to secure the stability of the plan's road.

**78C**

**78B** Residents in both townships rely on 30<sup>th</sup> St for emergency vehicle response. It is currently a 55 MPH road and it will reduce to 25-30 MPH with 2 major curves. Residents rely on 2500 gal tanker trucks to respond during a fire event, responding from as many as 5 fire stations. These townships are solely on well and septic. Transportation to and from the closest hydrant to refill trucks is crucial.

**78D** I am requesting that you acknowledge my comment and concerns regarding the MAC's 2035 LTCP Revised Plan B, review and re-evaluate the chosen option, and commit to a reasonable and agreed upon solution that will benefit both the residents and pilots within the Lake Elmo airport communities.

Respectfully submitted,





**Sarah Emmel**

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 9:00 PM  
**To:** Sarah Emmel  
**Subject:** FW: 21D renovation project

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

---

**From:** Leque, Chad <Chad.Leque@mspm.org>  
**Sent:** Thursday, April 19, 2018 8:59 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspm.org>; Ralston, Neil <Neil.Ralston@mspm.org>; Wilson, Evan <Evan.Wilson@mspm.org>  
**Subject:** Fwd: 21D renovation project

FYI

**CHAD E. LEQVE**

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](tel:612-725-6326)

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Begin forwarded message:

**From:** "Maddy & Patrick Fleming" <[fleming@fastmail.com](mailto:fleming@fastmail.com)>  
**Date:** April 19, 2018 at 4:49:59 PM CDT  
**To:** [chad.leque@mspm.org](mailto:chad.leque@mspm.org)  
**Subject:** 21D renovation project

To whom it may concert and the Metropolitan Airports Commission:

**79A** | My name is Patrick Fleming, I live is Lake Elmo and I fly out of Lake Elmo Airport. These comments are to augment oral comments I made at the public meeting on 4 April 2018. I live 9 minutes from the 21D. Any other airport is at least a 50 minute round trip by the time I get inside an to a hanger location. This is the only airport in Washington county and we need to preserve it.

**79B** | I fly a Cherokee Six and I fly almost exclusively for personal travel and the training needed to maintain my proficiency. When I am traveling with my family, I operate the airplane very near its maximum weight. I will not land at a destination airport with less than a 3000 foot runway, and I prefer 3500 feet. This puts Lake Elmo below my personal minimums for travel. I usually make an exception for my home base airport because I know the area well, but I do have a contingency plan to have my family drive to another airport where I will pick them up if conditions (temperature and wind) do not allow for a safe departure from 21D.

**79C** | I have a idea of the logic of why the airport needs to have a runway extension that I have not heard stated and it is this. 1) It is not feasible to close the airport because the MAC has accepted federal funds for improvements in the past and therefore are obligated to keep the airport open. 2) The runway pavement needs to be replaced and federal funds (that come from aviation fuel taxes) are available to pay for the re-paving of the runway. 3) However, in order to get those federal funds, the airport has to be "brought up to code". There is currently a road in the runway exclusion zone and the runway is too short to effectively serve the needs of the equipment it is designed to serve. Therefore, the runway needs to be moved and extended in the repaving process.

**79D** | The MAC is also doing Washington County a favor. The county has plans to upgrade and modify Manning avenue. If the runway is not moved, the county will have to put a new curve in the road to avoid the current runway exclusion zone. This will require land acquisition and an additional curve in a heavily traveled road.

**79E** | I support the runway repaving and extension and hope the project goes smoothly.

-patrick fleming-

--

[fleming@fastmail.com](mailto:fleming@fastmail.com)

April 18, 2018

Chad Leque, Director of Environment  
Metropolitan Airports Commission  
6040 28th Avenue S  
Minneapolis, MN 55450

RE Lake Elmo Airport Expansion

**80A** | I am OPPOSED to any runway expansion/improvements at Lake Elmo airport.

**80B** | First and foremost, 30<sup>th</sup> Street cannot change from its current configuration. It is way to dangerous to add a curve in inclement weather and it deters from response time for emergency vehicles.

I'd like to comment on "MAC Math".

**80C** | Table 4-1 on page 4-5 had some very interesting numbers. How did you ever come up with those operation numbers at Lake Elmo? 14,561 military operations? Not a chance of military operations in numbers that great. Air taxi 1,147? General aviation 10,790? Even the reported number of based number of aircraft (209) is incorrect. The correct number per the FAA in February of 2018 is:

Single engine:	172
Multi-engine:	4
<u>Rotorcraft:</u>	<u>1</u>
Total:	177

Per the article on Twin Cities.com, "Now, according to the new FAA mandate, a plane must fly less than 3,000 feet above Holman field's space and a control tower must make contact in order for the plane to be included in St. Paul's operation numbers." Are you doing the same method of counting at Lake Elmo? Anything that flew threw the airspace based on radar was counted as an operation? The paper also stated that touch and goes can no longer be counted as an operation, which brings me to:

From the LTCP 2035: "On Saturday, August 29, 2015, a group of citizens counted aircraft operations at Lake Elmo Airport from 7:00am until 10:00pm. According to one commenter, over the course of the day, the citizens reported observing 54 aircraft movements, of which 37 were touch-and-go's. Per industry criteria, each touch-and-go counts as two aircraft operations (a takeoff and a landing). This equates to 74 daily operations associated with touch-and-go's. When combined with the number of itinerant (non touch-and-go) operations observed, the total traffic count for the day is approximately 91. This number correlates very well to the summertime on-site observations that formed the basis for the activity forecast."

**80D**

Reality: August 29, 2015, our neighborhood did an actual count of operations at the airport. Our total was 57, of which 34 were touch and goes. Someone at Mead & Hunt or MAC decided that we counted the touch and goes as one operation instead of two and changed the total number of operations to 91 for the purpose of the operation count in the LTCP report without consulting any of us.

80E

Extending the 14/32 runway to 3500' and 04/32 to 2750' still does not safely meet the need of the category II and III aircraft in the 12,500 lb. classification in the event of aborting a takeoff or overrun landing per chart 2.1 in the EA/EAW report. 3600' of runway does not encompass these aircraft at 100% either. It leaves Lake Elmo in the same position it seems to be in today, pilots flying planes into an airport that barely meets its takeoff and landing needs. Many of the aircraft landing at Lake Elmo for various events should absolutely not be there, which directly affects the safety of those of us on the ground whether on airport property or not. If the larger planes, per MAC, can more easily land on the crosswind runway at 2750', then why are we extending runways? What is currently there should be totally sufficient on 14/32 and feel free to extend 04/32 to 2750'.

Section 4-4 Land Uses and Zoning

- Places of Assembly: The Washington County Fairgrounds are located one mile north of the Airport in Baytown Township. None of these places of public assembly is within the approach and departure areas at the Airport.

This is incorrect. The Fairgrounds are located directly across the road from airport property and is directly north of the 14/32 runway. In addition to hosting the Washington County Fair every year, many other entities rent the facility all year for flea market sales, kids and clothing sales, baseball and soccer events, horse shows, dog shows, etc., attracting hundreds, sometimes thousands of people.

80F

80G

- The nearest parks/recreational areas are Reid Park and Lake Elmo Park Reserve. Reid Park is a 30-acre community park equipped with a playground and several fields for sporting events such as soccer, football, and softball. Neither of these parks is in the approach or departure areas at the Airport.

This is incorrect. Reid Park is located less than 1 mile west of runway 04/32 where takeoff and landing occurs directly over the park.

- Farmland – Soils at Lake Elmo Airport are classified in **Figure 4-5** and primarily consist of prime farmland and farmland of statewide importance

80H

**Mead & Hunt and the MAC have failed to note that the Lake Elmo airport property is included in a super-fund clean up for TCE contamination since the 1990's.**

- Land Use. Effects to existing and planned neighboring land uses were identified using the Model State Safety Zones A and B promulgated under Minnesota Rule

8800.2400 as a guide. These zones are not currently in effect at the Airport. Safety Zone A typically prevents erection of new structures or expansion of existing structures, and Safety Zone B typically prevents small lot residential development using density standards. Before completing the EA/EAW process, the MAC will start convening a Joint Airport Zoning Board (JAZB) under Minnesota Statutes Chapter 360. The process will consider public input as part of developing an airport-zoning ordinance. This process may result in a zoning ordinance recommendation to the MnDot Office of Aeronautics that deviates from the state's model zoning ordinance.

**80I** Zoning has been required at Lake Elmo since 1977. MAC has failed to comply at the request of the Met Council and MnDot to assemble a joint zoning board for the purpose of zoning for the Lake Elmo airport. If zoning had been in place, perhaps we wouldn't be in this situation today. To proceed with this expansion / improvement at this point in time, with the MAC promising once again to form a joint zoning board to assist in putting zoning in place after the expansion, it seems that MAC would be asking forgiveness instead of permission to the parties involved. Maybe better said, this expansion puts the cart ahead of the horse in a BIG way. This is not right and should not be allowed. In my opinion, the MAC considers themselves privy to and above regulations that restrict other airports in Minnesota.

**80J** ADS-B transponders are required in all aircraft per the FAA in the 7 county metro areas by 2020. It is a requirement for all aircraft by 2025. This will likely cause a large number of pilots currently using Lake Elmo to retire from flying or move to an airport outside the 7 county metro area, giving yet another reason to not disrupt the thousands of people currently residing in the 2 mile area surrounding the airport. 30<sup>th</sup> Street was recently upgraded to a major contributing artery road in Washington County.

**80K**

**80L** The MAC decided solely on this plan and has absolutely refused to acknowledge that the airport over time has become land-locked. The 1965 dream of expanding runways in excess of 3000 feet are past. MAC should have purchased the property needed to support an expansion of this size long ago.

**80M**

**80N** Because there is not a user-based justification for expansion, the MAC should not be frivolously spending millions of our federal taxpayer dollars on expansions. We respectfully and wholeheartedly disagree with your purpose and need for Lake Elmo airport. It is simply not supported.

Respectively submitted,



Mary Vierling  
West Lakeland Township

Cc: Senator Karin Housley  
Representative Kathy Lohmer  
Andy Peek, FAA

## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 9:06 PM  
**To:** Sarah Emmel  
**Subject:** FW: comments for the record opposing the MAC proposed Lake Elmo airport expansion

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Thursday, April 19, 2018 9:05 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: comments for the record opposing the MAC proposed Lake Elmo airport expansion

FYI

### CHAD E. LEQVE

*Director of Environment*

#### Metropolitan Airports Commission

6040 28<sup>th</sup> Avenue South

Minneapolis, MN 55450

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Begin forwarded message:

**From:** Michael Seeber <[seeber@winternet.com](mailto:seeber@winternet.com)>  
**Date:** April 19, 2018 at 3:14:35 PM CDT  
**To:** <[chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)>  
**Subject:** comments for the record opposing the MAC proposed Lake Elmo airport expansion

Hi Chad, please accept the following comments for the record opposing the MAC proposed Lake Elmo airport expansion. There are simply way too many to take the time to recount here but I'll give a few.

### I'm qualified to speak

81A

I live close by the airport. I have been to most of the public meetings. I have found MAC laughably dishonest. The project is grossly wasteful, doesn't pass the smell test and is unnecessary.

| 81B

### Double speak

Last week in the public comment meeting they stated this is not an expansion but have previously called it an expansion. At a previous meeting they stated the environmental study is not really an environmental study. They have made wildly exaggerated claims about the number of flights and when questioned say they really don't keep track. Also, one plane can touch wheels down and go right back up

many times and each time they count that as another plane. They have denied publicly that taxpayer money is being used, while taking money from the public and federal likewise.

## Due process? Not really

The public meetings give the appearance of due process without any substance. They claim they have made concessions but have never given an inch to our one and only point which is keeping the runway at it's current length. They claim to listen but don't and push their agenda by force. Asking for a longer runway and cutting a few feet back as a "compromise" is an insult. The oldest trick in the book; so transparent it's laughable that they think we don't see it!

81C

## Mike Madigan is untruthful or doesn't remember

81D | Mike Madigan stated in a public meeting last summer in Baytown that the current runway is too short and unsafe and later denied saying it. If true, the airport needs to be shut down now. If false, he misspoke, doesn't know or remember what he said or is untruthful. Either way, his argument fails. FACT: For the last 50 years every single pilot, for every single flight, has deemed the runway long enough and safe enough to utilize it. No lengthening is needed for safety.

## 30th Street "corkscrew" proposal silly

81E | Their "compromise" plan for 30th street is a joke with the wild curve around, jutting out and back again, encompassing the end of the runway. It's hard to believe anyone at MAC thinks this is good, safe or even acceptable. Our fire department opposes it. Our people oppose it. Our town boards will not approve it; it is against our wishes and against common sense. Also, 30th street is now a major arterial road as I understand. This alone will kill the project... it simply doesn't work.

## TCE pollution

81F | In addition in around 1990 there was TCE pollution in the area and it was deemed a superfund site I think. Several monitoring wells set up around the airport. Why didn't the "environmental study" contain this information or maybe I missed it. Any construction digging up dirt will stir up contamination and will probably not even be allowed by federal and state authorities.

## New Richmond airport a better use of resources

81G | A better use of this "free" money will be the New Richmond airport which needs and wants the growth and is better situated.

## Bottom line

81H | It is most important to understand that the bottom line for pushing this project is that MAC must lengthen the runway to qualify for federal funding to pay for the repaving.

## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 9:06 PM  
**To:** Sarah Emmel  
**Subject:** FW: Lake Elmo Airport comments

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Thursday, April 19, 2018 9:05 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo Airport comments

FYI

### CHAD E. LEQVE

*Director of Environment*

**Metropolitan Airports Commission**

6040 28<sup>th</sup> Avenue South

Minneapolis, MN 55450

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Begin forwarded message:

**From:** [djbucheck@comcast.net](mailto:djbucheck@comcast.net)  
**Date:** April 19, 2018 at 2:40:47 PM CDT  
**To:** [Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org), [Andy.peek@faa.gov](mailto:Andy.peek@faa.gov)  
**Subject:** Lake Elmo Airport comments

Mr. Chad Leqve,  
Mr. Andrew Peek,

I attended the hearing on the proposed Lake Elmo Airport expansion at Oakland Middle School, Lake Elmo on April 4, 2018. I was not able to read my complete statement and did omit some questions due to timing, however did leave the written statement and questions with your recorder. I do have more questions. There is no zoning in place which has been required at all reliever airports since 1976. Why have you not obtained zoning? What zoning do you intend to have? Homes have been

**82A**

built extremely close with large holding ponds due to the water runoff. Lack of zoning is lack of protection to residents and pilots. If you do not have guaranteed zoning why has your agency proceeded with this project? What have you requested and what have you received?

I continue to feel this airport project is incorrect for a number of reasons.

Ann Bueck  
2301 Legion Avenue  
Lake Elmo MN 55042  
[djbueck@comcast.net](mailto:djbueck@comcast.net)



## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 9:07 PM  
**To:** Sarah Emmel  
**Subject:** FW: Lake Elmo Airport renovation

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

---

**From:** Leqve, Chad <Chad.Leqve@mspm.com>  
**Sent:** Thursday, April 19, 2018 9:06 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspm.com>; Ralston, Neil <Neil.Ralston@mspm.com>; Wilson, Evan <Evan.Wilson@mspm.com>  
**Subject:** Fwd: Lake Elmo Airport renovation

FYI

### CHAD E. LEQVE

*Director of Environment*

#### Metropolitan Airports Commission

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Minneapolis, MN 55450

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Begin forwarded message:

**From:** "Maddy & Patrick Fleming" <[fleming@fastmail.com](mailto:fleming@fastmail.com)>  
**Date:** April 19, 2018 at 6:39:03 PM CDT  
**To:** [chad.leqve@mspm.com](mailto:chad.leqve@mspm.com)  
**Subject:** Lake Elmo Airport renovation

Dear MAC,

Lake Elmo Airport saved my life.

Twenty-plus years ago, while learning to fly with Alpha Aviation in South St. Paul, I departed on a solo flight from Fleming Field's single runway. The crosswind that day was stronger than any I'd experienced as a student pilot. I managed to get above the terrain without incident, but I realized that landing was going to be a much bigger challenge.

83A

When I returned to the airport, I made several attempts to land, but eventually realized I probably wouldn't make it down safely onto that runway. The downtown St. Paul airport was closed due to flooding, eliminating my first choice of an alternate, so I flew over to Lake Elmo. There, where one of the two runways was aligned to the wind, I was able to land the plane safely without the crosswind.

The next day, with the winds mostly unchanged, my instructor taught me how to land with a crosswind. He agreed that it was inconvenient for Alpha to get to Lake Elmo to retrieve me and the plane, but that choosing Lake Elmo was the right thing to do in the situation.

I was glad it was there. I hope it will stay.

Best regards,  
Madeleine Fleming

--

[fleming@fastmail.com](mailto:fleming@fastmail.com)

## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 9:08 PM  
**To:** Sarah Emmel  
**Subject:** FW: Lake Elmo airport comments

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Thursday, April 19, 2018 9:06 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo airport comments

FYI

### CHAD E. LEQVE

*Director of Environment*

**Metropolitan Airports Commission**

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Begin forwarded message:

**From:** [djbucheck@comcast.net](mailto:djbucheck@comcast.net)  
**Date:** April 19, 2018 at 2:12:42 PM CDT  
**To:** [Chad.leqve@mspmac.org](mailto:Chad.leqve@mspmac.org)  
**Subject:** Lake Elmo airport comments

Mr. Chad Leqve,

84A

I attended the hearing on the proposed Lake Elmo Airport expansion at Oakland Middle School, Lake Elmo on April 4, 2018. I read a statement at the meeting and left my statement and questions with the recorder. At the meeting a representative from the New Richmond, Wisconsin, airport spoke. He stated their airport was larger than the Lake Elmo Airport and could accommodate additional planes and flights.

Although this airport is in an adjoining state, why isn't the FAA and your organization

working with them to plan for the future? They seem eager to expand, and you must admit you have received opposition regarding your proposal. There have no opposition and are ready to expand, ready for more business. Why not work with our neighbors to the east?

**84B** | I continue to feel this airport expansion is incorrect for a number of reasons.

Ann Bucheck  
2301 Legion Avenue  
Lake Elmo MN 55042  
[djbuccheck@comcast.net](mailto:djbuccheck@comcast.net)

## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Thursday, April 19, 2018 9:07 PM  
**To:** Sarah Emmel  
**Subject:** FW: Lake Elmo Airport Expansion - OPPOSITION

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Thursday, April 19, 2018 9:05 PM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Lake Elmo Airport Expansion - OPPOSITION

FYI

### CHAD E. LEQVE

*Director of Environment*

**Metropolitan Airports Commission**

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[Minneapolis, MN 55450](#)

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**F:** [612-725-6310](tel:612-725-6310)

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Begin forwarded message:

**From:** Molly K Olson <[molly@mollykolson.com](mailto:molly@mollykolson.com)>  
**Date:** April 19, 2018 at 4:59:51 PM CDT  
**To:** <[chad.leqve@mspmac.org](mailto:chad.leqve@mspmac.org)>  
**Subject:** Lake Elmo Airport Expansion - OPPOSITION

Please see attached if the format of this email is not easily understood.

Molly K Olson

**To:** F.A.A. and Minnesota Metropolitan Airport Commission (M.A.C.)

**From:** Molly K Olson, resident of West Lakeland Township, MN  
2301 Neal Avenue North, West Lakeland Township, MN 55082  
[molly@mollykolson.com](mailto:molly@mollykolson.com) cell 651 276 5566

**RE:** Lake Elmo Airport Expansion and Request for Federal Funding to Repair and Expand

**Public Comment:** **AGAINST EXPANSION/AGAINST M.A.C. PLAN**

**Date:** April 19, 2018



85A

- ? THE LAKE ELMO AIRPORT EXPANSION by M.A.C. IN MINNESOTA **SHOULD NOT BE APPROVED BY THE F.A.A.**
  - o The community is PLEADING with the F.A.A. that you listen to the community and come out here and see for yourself WHY this expansion is problematic and will destroy our community, and why there is NO NEED and how they Minnesota Metropolitan Airport Commission (M.A.C.) has not been honest about how this **micro recreational airport** is being used.
  - o The state M.A.C. has pretended to listen to the concerns of the community, but they have instead spent most of their time TELLING us what they are going to do anyway – regardless.
    - ✍ They claim to have made 2 changes in their plan to pacify the community, but neither change solves the concerns. Their changes are only window dressing so they can say some changes were made.

85C

? THE MINNESOTA STATE M.A.C. IS BASING IT'S ENTIRE PLAN ON A MAP OF THE AREA FROM ABOUT 50 YEARS AGO WHEN THIS WAS A VERY DIFFERENT COMMUNITY. THE ENVIRONMENTAL ASSESSMENT CONSISTENTLY MINIMIZED THE IMPACT ON PEOPLE.

- o Now the state has discovered massive water contamination in the area – M.A.C.'s "hired gun" who did the Environmental Assessment has continued to ignore the impact or potential impact on the water issue. The water contamination has recently been escalated with the closing of wells in the area, dramatic clean up issues, and a lawsuit decision against those blamed for the contamination (i.e. the 3M corporation).
- o Now the number of houses and developments that have been developed over the last 50 years is dramatically higher and even more concentrated around the airport. This has occurred over the last 5 years, but many in the last 2 years. Homes/citizens are an afterthought and an annoyance to M.A.C. The homes/citizens are greatly impacted, it is highly relevant, and has been continually dismissed by M.A.C.

85E

- o The main (one and only) road going east-west would need to be re-routed. Their re-route plan is not only a safety hazard – but just LOOK at their map of the road – how can ANYONE in their right mind say that is O.K. and safe? It defies common sense.
- o The main (one and only) road going north-south is beginning an expansion plan, and this was ignored or minimized by M.A.C "hired gun."
- o And there is MORE that we have told M.A.C. please contact us for more details.

85B

85D

85F

? THERE IS **NO LEGITIMATE PUBLIC PURPOSE OR NEED** FOR THIS COMMUNITY OR THE STATE AND THIS UNWARRANTED EXPENDITURE (aka EXPANSION OF THE RUNWAY LENGTH AND OTHER SO-CALLED IMPROVEMENTS THEY "WANT" TO MAKE ONLY TO GET THE FEDERAL MONEY.) THE AIRPORT MAY NEED RESURFACING, BUT THERE IS NOTHING ELSE NEEDED.

? M.A.C. has **COMPLETELY MISREPRESENTED** THE ACTUAL FLIGHTS PER DAY AT THIS AIRPORT. The community has A LOT of evidence of the "fake" numbers that M.A.C. has provided to the F.A.A. in their report.

85G

**85H** | ? THE EXPANSION IS A MONEY GRAB FOR FEDERAL MONEY THAT IS UNWARRANTED. THERE IS A MUCH LARGER BIGGER AND BETTER AIRPORT 15 MINUTES AWAY (into a popular Wisconsin area and they WANT more traffic we do not want) THAT CAN SERVE THE NEEDS OF LARGER AIRCRAFT. THIS Lake Elmo Airport, HIGHLY UNDERUTILIZED AND CONTINUALLY DYING AIRPORT, IS ONLY USED MOSTLY FOR SMALL A 2-4 SEATER HOBBYISTS, AND A SMALL PRIVATE PILOT SCHOOL. It is public money being used for purely private purpose.

**85I**

**85K** | ? THE STATE COULD REPAIR THE EXISTING RUNWAY, KEEPING THE ROAD AND THE RUNWAY LENGTH AS IS, WITH THEIR OWN STATE FUNDS (NOT FEDERAL FUNDS) AND THE COMMUNITY WOULD BE PERFECTLY HAPPY.

- o THE COMMUNITY IS NOT AGAINST THEIR AIRPORT, THEY ARE AGAINST THE UNWARRANTED EXPANSION of this airport.

The employees of Minnesota M.A.C. have tried to give the community surrounding the (false) impression that they care about what the community thinks and KNOWS (first hand) about the airport and the impact an expansion would have on the entire community. From the beginning their efforts to get community involvement have only been to "tell" us what "they" are "doing." It has NOT been a collaborative approach with the community. The community is only being addressed because there is SO much opposition, they can't ignore it. Consistently throughout the process of "telling" the community what they were doing, NO WHERE in their stated "purpose and need," did the any actual public purpose for this.

**85L**

**Does the F.A.A. care about the truth?**

Obviously the Minnesota Metropolitan Airport Commission does NOT care about the truth. We as a large body of opposing neighbors, speaking for ourselves as well as all the neighbors to whom this expansion has not been shared with.

I have run out of time to write more today, but I am happy to share a wealth of reasons why the F.A.A. should not allow this unwarranted airport expansion.

**85M** | PLEASE STOP THIS EXPANSION.

Molly K Olson

## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Friday, April 20, 2018 8:39 AM  
**To:** Sarah Emmel  
**Subject:** FW: Message from www.faa.gov: Comment/Question For Minneapolis Airports District Office

---

**From:** Leqve, Chad <Chad.Leqve@mspmac.org>  
**Sent:** Friday, April 20, 2018 6:55 AM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Nelson, Dana <Dana.Nelson@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Wilson, Evan <Evan.Wilson@mspmac.org>  
**Subject:** Fwd: Message from www.faa.gov: Comment/Question For Minneapolis Airports District Office

FYI

### CHAD E. LEQVE

*Director of Environment*

**Metropolitan Airports Commission**

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

**O:** [612-725-6326](tel:612-725-6326)

**F:** [612-725-6310](tel:612-725-6310)

[www.MetroAirports.org](http://www.MetroAirports.org)

[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** <[Andy.Peek@faa.gov](mailto:Andy.Peek@faa.gov)>  
**Date:** April 20, 2018 at 6:40:57 AM CDT  
**To:** <[spitzkrieg72@gmail.com](mailto:spitzkrieg72@gmail.com)>  
**Cc:** <[Joshua.Fitzpatrick@faa.gov](mailto:Joshua.Fitzpatrick@faa.gov)>, <[Chad.Leqve@mspmac.org](mailto:Chad.Leqve@mspmac.org)>  
**Subject:** RE: Message from [www.faa.gov](http://www.faa.gov): Comment/Question For Minneapolis Airports District Office

Mr. Spitzer,

This email reply is an acknowledgment of your concerns, your request will be added to the comment letters which will received a written response to during the public review of the Draft Environmental Assessment.

Best regards,

Andy Peek  
Manager, Dakota-Minnesota Airports District Office  
Federal Aviation Administration (FAA)

Office of Airports - Leaders in creating and advancing the safest, most efficient airport system in the world through integrity, collaboration and innovation!

-----Original Message-----

From: [spitzkrieg72@gmail.com](mailto:spitzkrieg72@gmail.com) [mailto:[spitzkrieg72@gmail.com](mailto:spitzkrieg72@gmail.com)]

Sent: Thursday, April 19, 2018 3:07 PM

To: Peek, Andy (FAA) <[Andy.PEEK@faa.gov](mailto:Andy.PEEK@faa.gov)>

Subject: Message from [www.faa.gov](http://www.faa.gov): Comment/Question For Minneapolis Airports District Office

This email was sent through the Federal Aviation Administration's public website. You have been contacted via an email link on the following page:

[www.faa.gov/airports/great\\_lakes/about\\_airports/dma-ado/](http://www.faa.gov/airports/great_lakes/about_airports/dma-ado/)

Message:

-----  
To Whom It May Concern,

<b>86A</b>	I am opposed to the current plans for runway expansion at the Lake Elmo Airport, located in Lake Elmo Minnesota. The Lake Elmo airport is classified as a reliever airport in the MSP Metropolitan Airport Commission (MAC) airport system. The Lake Elmo airport doesn't have enough actual operations, or enough use, to be able to pay for repaving of the current runway as it is. The vast majority of the money that the airport will need will be coming from the FAA and federal tax dollars, since it doesn't have the money for such a project. This suggests financial mismanagement, and/or extreme lack of use. In order to qualify for federal funding, the airport will have to extend it's runway. The Lake Elmo airport is currently getting a waiver so it won't have to extend the runway to full FAA regulations. The management of the Lake Elmo airport, and MAC, are using part of an outdated expansion plan that does not accommodate the residential communities that have grown around it over the decades. Over the decades, use of the Lake Elmo Airport has decreased and Federal aviation regulations have increased. The MAC, and the Lake Elmo airport management consequently, are non-elected bureaucratic officials whose decisions will negatively impact the lives of citizens that live around the airport. Their quality of life and property values will decline because of this expansion. If this was a governmental eminent domain issue, based off of a "good of the community", then it could be approached in a different fashion. But, non-elected bureaucratic officials are trying to fundamentally affect the lives of tax paying citizens. The Lake Elmo airport management is trying to ram through this bad plan to avoid zoning requirements that have been required at reliever airports since 1976. I would formally request that the FAA not fund this project, and that the federal funding go to larger airports like Holman field or the New Richmond, WI airport. The Lake Elmo airport should be able to maintain it's current runways through its own accounts, and the revenue that it receives from the pilots that utilize that airport. I request that you acknowledge my concern(s), and reconsider the chosen options.	<b>86C</b>
<b>86B</b>		<b>86E</b>
<b>86D</b>		<b>86G</b>
<b>86F</b>		<b>86I</b>
<b>86H</b>		<b>86K</b>
<b>86J</b>		

Respectfully submitted,

Hans Spitzer  
2654 Neal Ave N  
West Lakeland Township,  
MN 55082  
651-472-4755 (mobile)

## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Friday, April 20, 2018 8:53 AM  
**To:** Sarah Emmel  
**Subject:** FW: Lake Elmo Airport

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

-----Original Message-----

**From:** Nelson, Dana <Dana.Nelson@mspmac.org>  
**Sent:** Friday, April 20, 2018 8:52 AM  
**To:** Evan Barrett <Evan.Barrett@meadhunt.com>; Wilson, Evan <Evan.Wilson@mspmac.org>; Leqve, Chad <Chad.Leqve@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Colleen Bosold <Colleen.Bosold@meadhunt.com>  
**Subject:** FW: Lake Elmo Airport

Note - this comment came in after the comment period closed. We should talk about how to handle this during our meeting this morning.

DANA NELSON  
Manager – Noise, Environment and Planning Metropolitan Airports Commission  
6040 28th Avenue South  
Minneapolis, MN 55450  
O: 612-725-6330  
F: 612-725-6310  
www.macnoise.com

-----Original Message-----

**From:** Bob [mailto:rlupelow@q.com]  
**Sent:** Thursday, April 19, 2018 9:22 PM  
**To:** ContactLakeElmoAirportEA <ContactLakeElmoAirportEA@mspmac.org>  
**Subject:** Lake Elmo Airport

Robert Lupelow  
3908 Homewood Ave  
White Bear Lake, Mn. 55110  
612-804-3009

**87A** As a pilot flying at 21D for 38 years and airplane and hangar owner for 25 years, I believe the planned runway extension and realignment is a long overdue safety enhancement. 21D is as it has been for many years prior to my business and personal flights a viable and necessary location. As to others opinions per Krnh being a reasonable replacement, I **87B**  
**87C** strongly disagree. I would probably relocate to Kane instead.

Thank You for your consideration.  
Bob Lupelow

Sent from my iPad



Mr. Andrew Peek  
Federal Aviation Administration  
6020 28<sup>th</sup> Avenue S  
Minneapolis, MN 55450

April 20, 2018

Mr. Peek;

Please find attached a copy of a comment letter which was sent to Director Leque of MAC organization.

I am a resident of West Lakeland Township and have been an active participant with the neighborhood in questioning the need for the runway expansion at Lake Elmo Airport.

If you have any questions regarding my comments please feel free to contact me.

Sincerely,



Marian R. Appelt  
2655 Neal Ave N  
Stillwater, MN 55082  
[halramsdakota@comcast.net](mailto:halramsdakota@comcast.net)

FAA - DMA ADO  
MINNEAPOLIS  
APR 20 2018

RECEIVED

Metropolitan Airport Commission

To: Chad Leque and the Metropolitan Airport Commission Members

Director Leque and MAC Commissioners,

FA/  
M'

I am a resident of West Lakeland and have been active with my neighbors in questioning the need for the run expansion at Lake Elmo Airport over the past 2 years. I have attended all of the public meetings regarding the Environmental Assessment. I also have read the draft of EA/EAW. I am writing to continue to express my concerns regarding the preferred runway expansion plan of the runways at the Lake Elmo Airport.

**88A** | The EA/EAW presented a thorough look at the impact of the expansion plan however I do not agree with all the conclusions, especially regarding the impact on the surrounding communities. The EA/EAW states the impact is not substantial. I disagree with this. The main issues continue to be the realignment of 30<sup>th</sup> Street, the removal of the trees, which currently provide a natural sound and light barrier, and the flight path change to direct the traffic more directly over the homes along Neal Avenue. The 30<sup>th</sup> Street realignment continues to be a major concern. The traffic on 30<sup>th</sup> Street I believe was underestimated. It is a major east-west road. The curves in the road and the change in the elevation through the area the road is planned will present problems. Regarding the removal of the trees, the plan provides mitigation plans for the removal of the trees by a number of actions (light baffles, solid fencing, and installation of different intensity lights) but it is not clear how these plans will be monitored to assure these actions are actually completed. These trees and some of the trees on private property are oak trees of substantial years. Especially for the trees on the private properties this is a substantial impact. The shift of the runway 610 feet to the east will put the flight path more directly over the homes along Neal Avenue. This has an impact on these homes especially regarding the sound. | **88B**

**88C** |

**88E** | My biggest concern with the MAC 2015 plan for Lake Elmo is that I do not believe there is a need for the airport expansion.

**88F** |

- The projections of the number of operations and the number of planes at the airport between the 2008 & 2015 plan shows the airport use to be flat or declining which means there is a decreased interest in recreational flying and does not support airport expansion.

- The regional airports are all underutilized as stated in a recent article in the Pioneer Press so expansion does not seem prudent | **88G**

**88H** |

- Other airports can accommodate the larger planes which need the longer runways
- New Richmond airport may not be within the MAC system but I would think the FAA would want to look at the region and not just at MAC airports before spending the funds at Lake Elmo | **88I**

**88J** |

- Expansion of the airport with all the residential development projects planned for Lake Elmo is not a good fit. MAC needs to consider that the area around the airport may no longer supports the airport expansion.

**88K** | I acknowledge the effort by MAC to adjust the original preferred plan to address the 30<sup>th</sup> Street concern of neighbors, however I do not believe the 100 foot reduction in length and the new 30<sup>th</sup> Street plan was enough of a compromise. MAC also created the CEP however the results did not seem to build the trust between the community and MAC as hoped. The community still has the impression MAC was creating this group to appease the community with no intent to really listen. A number of disrespectful comments were addressed to the community members by the Commissioners and MAC personnel. This does not build good relationships. | **88L**

88M

I do understand that in order to obtain the federal funds for the project MAC would need to bring the runway up to the newer standards regarding safety zones etc. It has also been pointed out to me that major work like this is always done with federal dollars. Perhaps it is time to figure out alternative funding options for fixing the current runways without the added expense of building the longer ones and to invest the federal dollars in other areas i.e. a cross winds runway for the New Richmond airport.

88N

88O

The airport has been a good neighbor and the community enjoys the airport, as it is. Unfortunately the community grew up around the airport and some of this growth was imposed by the Met Council. Longer runways and larger planes are not consistent with the area now. I do have difficulty understanding how this project continues to be moved forward when all the surrounding municipalities have voiced their objections to this plan and the state officials representing the community have spoken against the plan. Met Council approved the Lake Elmo Comprehensive plan which states it does not support the airport expansion yet the Met Council also approved the MAC for the expansion. Perhaps there needs to be some oversight on these two bodies which does not exist today.

Thank you for the opportunity to express my concerns.

Sincerely,

Marian R. Appelt  
2655 Neal Ave N  
Stillwater, MN 55082  
[halramsdakota@comcast.net](mailto:halramsdakota@comcast.net)

## Lake Elmo Environmental Review Comments

John L. Krack

19 April 2018

My name is John Krack. I live in Fridley, MN. I've been a recreational pilot for over 50 years, and have flown out of MAC airports for most of that time, starting at Crystal, and now at Anoka. I am also the chair of the Reliever Airports Advisory Council, and in that role have an interest in all of the MAC reliever airports.

**89A** First of all, I fully support MAC's recommendation to relocate and extend runway 14/32 at the Lake Elmo airport.

I attended the April 4<sup>th</sup> public hearing, and was somewhat disturbed over the passionate concerns expressed by many of the participants. Aside from those who don't want an airport in their backyard period, I left with the impression that the meaningful concerns are twofold:

- Concern that the longer runway will bring in larger aircraft and result in more noise
- Concern that the re-route of 30<sup>th</sup> Street N will create a bottleneck during busy times (i.e., rush hour) with its curves and lower speed limit, and could become a hazard in slippery conditions.
- An overriding concern expressed by some was that "MAC doesn't listen, and just rams through what they want to do."

I'll address the last item first, then discuss the first two, and finally note why I think the proposed EAW should be approved.

### 1. "MAC Doesn't Listen"

I guess the definition of "listen" can be subjective, but the Merriam-Webster definition is:

"to hear something with thoughtful attention : give consideration : *listen* to a plea"

To me, this involves giving counterparties' concerns serious attention, offering meaningful answers/explanations, and trying to reach an acceptable compromise where feasible. It does NOT mean necessarily acquiescing to everything the other party wants.

**89B**

I have watched the development of the Lake Elmo (and also Crystal) LTCP and the subsequent Lake Elmo Environmental Review pretty much from the beginning, and I've commended MAC publicly on several occasions on the openness, transparency, and responsiveness of these efforts. I've seen multiple significant revisions to these plans to address stakeholder input, and a concerted effort to try to walk the fine line between airport needs and citizen concerns. I believe that MAC has given all comments "thoughtful attention" and "due consideration." Unfortunately, not all issues are reconcilable to everyone's satisfaction, and MAC's first priority is to their statutory charter to optimize the safety and utility of their airports while addressing the present and future needs of the aviation community.

In my opinion, MAC's process of openness and outreach to the community has demonstrated a willingness to listen and attempt to address concerns, and while some may be disappointed with the final recommendation, I expect the outcome to be at most a minor inconvenience rather than a major disruption.

### 2. "The changes will bring bigger airplanes and more noise"

Looking at the graphic MAC published in one of its handouts, the longer runway will certainly make the airport more accessible to some aircraft at the higher end of the design class, but it's questionable how many of such aircraft would use the airport on a regular basis, particularly, as some pointed out at the hearing, there are two nearby airports (STP and New Richmond) with

89C

much better facilities (longer runways and better approach facilities) to accommodate the larger aircraft, particularly in less than ideal weather conditions. For several of these aircraft (Beech Baron 58, King Air 200, Socata TBM 700) a 3500' runway appears to be a bit marginal, and it's unlikely that an operator would want to base at an airport that might be marginal under not infrequent weather conditions (no headwind, hot day, wet or snowy runway, etc.).

It's also questionable whether a larger departing aircraft would bring appreciably more noise by the time it crossed the airport boundary. That could certainly be explored as part of the environmental review. However, the noise contours depicted in the draft EAW show the 60DNL level (well below the FAA's standard of 65) entirely on airport property, indicating that noise should not be a significant impact. Although DNL is the generally accepted noise standard, it represents an average over 24 hours, and since night operations will be minimal, day operations could be greater. It would be interesting to see the expected noise footprint of some of the larger aircraft that might use the airport that might not use it today.

89D

89E

What the longer runway WOULD do is make operations safer for virtually all aircraft that use the airport. A malfunction on takeoff or a misjudgment on landing would give the pilot significantly more room to safely recover, benefitting both the pilot and nearby residents.

89F

Finally, MAC is updating noise abatement plans for all reliever airports, and is making a greater effort to communicate these plans to the aviation community. Most of the pilots I know want to be good neighbors and, consistent with safety, will operate to minimize noise impacts on surrounding communities if they are made aware of what the guidelines are. Moreover, MAC has a noise department that follows up on all complaints, and will work with operators to address any problems.

In my opinion, the noise concern is based more on fear than reality.

3. "Re-routing 30<sup>th</sup> Street North will cause a serious disruption"

89G

Based on peoples' comments, this would cause me the most concern. Will this really create a significant bottleneck and impede emergency traffic? Appendix B of the EAW presents a very detailed analysis of the situation, and indicates that the additional travel time at posted speed limits would be around 46 seconds. Hardly a major inconvenience. The EAW also indicates it would not have a negligible impact on emergency response based on discussions with the local responders. The curves might be a problem (especially in snowy/icy conditions), but we all negotiate curved roads all the time and don't give it a second thought. The 30 mph speed limit might be a bit inconvenient, but in a low traffic situation would take the aforementioned 46 more seconds to travel between Manning and Neal avenues. We often spend more time than that waiting at traffic lights as we travel about. In high traffic situations, vehicles would likely be bottlenecked at the intersections (stop signs or traffic lights) anyway, and even a 60 mph limit wouldn't save much time. One thought: if the proposed design is considered to pose a throughput problem, consider widening the eastbound section of the curve to two lanes, thus doubling the capacity to account for the lower speed limit. (Making the westbound curve two lanes would create a bottleneck where it dropped back to one lane, so probably wouldn't help much.)

89H

This reroute may be a minor inconvenience, but given the analysis in the EAW, I don't see it being a major disruption or a safety issue. However, the proposed reroute has the very significant advantage of keeping the roadway completely out of the RPZ, a safety factor for both motorists and pilots.

Finally, here's why I think the proposed plan should go forward:

89I

- 1. That runway 14/32 needs replaced is a given. Doing it in place does not address the incursion of Manning Avenue in the RPZ, which could result in rerouting Manning should it be widened in the future. Moving



the runway addresses that, with little other impact, and no future cost, to the community.

**89J** | 2. Modern aircraft are higher performance and need longer runways to operate safely. And any aircraft gets an extra margin of safety from a longer runway. From a pure safety standpoint, it makes sense to extend the runway, especially as more infrastructure is built around the airport. 2800 foot runways are largely obsolete. 3500 foot runways are more the norm, and conform to the FAA's guideline for the design class.

**89K** | 3. Extending the runway makes the airport more usable to aircraft at the higher end of the design class, particularly cabin class twins which small businesses would tend to use, and to existing aircraft users at heavier loads and in adverse weather conditions. This enhances economic benefit by potentially attracting small businesses to the local area because of a convenient airport, and transients who stay in area hotels, rent cars, and patronize restaurants and entertainment.

Significantly larger aircraft would likely go elsewhere, as a 3500 foot runway would be marginal for them.

In short, the airport is not likely to see a significant increase in large aircraft operations, but would offer economic benefits to the area and more convenience to aircraft operators.

**89L**

**89M** | 4. MAC's legislative charter is to manage its airports to optimize safety and utility. This plan is a significant step forward on both these fronts.

**89N** | 5. Finally, MAC has led a very thorough, open, and transparent process to get to this point. They've met with stakeholders, engaged community leaders, and modified the plan several times to accommodate community concerns. There's very little else that can be done under existing constraints of money and land. The LTCP has been approved by the Met Council and the FAA, so it fits in with these agencies' plans and guidelines. This isn't a "MAC only" project.

Thanks for the opportunity to comment on this report.

Regards,

John L. Krack

Chair, Reliever Airports Advisory Council

## Sarah Emmel

---

**From:** Evan Barrett  
**Sent:** Monday, April 23, 2018 9:17 AM  
**To:** Sarah Emmel  
**Subject:** FW: Lake Elmo Environmental Assessment

Sarah,

Please save this in the file but we probably won't include it in the final tally and responses.

**R. Evan Barrett, AICP | Planner, Aviation Services**

Mead & Hunt, Inc | 7900 West 78<sup>th</sup> Street, Suite 370 | Minneapolis, MN 55439  
Main: 952-941-5619 | Mobile: 612-597-4262 | Direct: 952-641-8820  
[evan.barrett@meadhunt.com](mailto:evan.barrett@meadhunt.com) | [www.meadhunt.com](http://www.meadhunt.com)

---

**From:** Nelson, Dana <Dana.Nelson@mspmac.org>  
**Sent:** Monday, April 23, 2018 9:00 AM  
**To:** Wilson, Evan <Evan.Wilson@mspmac.org>; Evan Barrett <Evan.Barrett@meadhunt.com>; Leqve, Chad <Chad.Leqve@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Colleen Bosold <Colleen.Bosold@meadhunt.com>  
**Subject:** FW: Lake Elmo Environmental Assessment

This comment came in on Saturday. Well past the deadline and past the 24-hour soft rule that we talked about on Friday.

**DANA NELSON**

*Manager – Noise, Environment and Planning*  
**Metropolitan Airports Commission**  
6040 28<sup>th</sup> Avenue South  
Minneapolis, MN 55450  
**O:** 612-725-6330  
**F:** 612-725-6310  
[www.macnoise.com](http://www.macnoise.com)

---

**From:** Mark Werner [<mailto:mwerner257@q.com>]  
**Sent:** Saturday, April 21, 2018 11:00 AM  
**To:** ContactLakeElmoAirportEA <[ContactLakeElmoAirportEA@mspmac.org](mailto:ContactLakeElmoAirportEA@mspmac.org)>  
**Subject:** Lake Elmo Environmental Assessment

Re: 30<sup>th</sup> street design

**90A** | I want to add my support for the airport expansion but believe 30<sup>th</sup> should be designed per alternative 1?

Reasons being the following:

1. 80% of the traffic on 30th is coming and going south on Neal. Majority of traffic is from neighborhoods south of the airport going to Manning via 30<sup>th</sup>.

2. In the future fire and police protection will come from Lake Elmo. Lake Elmo will change dramatically with the change to high density housing and connection to the Metro sewer system.
3. Adding a curve back to the existing intersection of Neal and 30<sup>th</sup> decreases safety and increases winter driving hazards.

**90B**

April 17, 2018

Mr. Andrew Peek  
Federal Aviation Administration  
6020 28<sup>th</sup> Ave S, Room 102  
Minneapolis, MN 55450

FAA - DMA ADO  
MINNEAPOLIS

APR 23 2018

RECEIVED

Dear Mr. Peek;

**91A** | I am writing in response to the Lake Elmo Airport Expansion in which I am totally against and to the re-routing of 30<sup>th</sup> Street due to the airport wanting to lengthen runways at the airport.

**91B** | We are one of the homes with the expansion that will be located in Zone A. We are concern about our home value loss and the concern about the future of selling our home. We will be about 700 feet closer to the end of the runway. How will the increase of noise and runway lights that will be aimed at my house be block since many of the trees that block it today will be cut down?

**91C**

**91D** | We have many deer, coyotes, fox, many types of birds and other small animals that may need to relocate because their habitat has changed they need to be protected to.

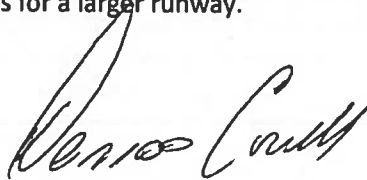
**91E** | We have concerns about the potential of water runoffs from those runways that could potentially put chemicals in our wells. We are very concern about our drinking water most residents in and around the airport are already having their wells tested every couple of years because we are in a well advisory area due to (TCE). What kind of guaranteed do we have that by disrupting the land around our homes these contaminates that are already in the area may flow into our wells that have been so far free of TCE? Also since chemicals such as deicing, fuels & other cleaners are used at the airport now & with the potential of having larger airplanes at this airport how are we guarantee over the years these chemicals will not flow into our wells?

**91F** | We built 31 years ago understanding that the airport was here and that the acreage around our home was yet not developed. Back than I could ride my horses on Neal Avenue & 30<sup>th</sup> Street as this was my hobby, however, over the years the land was develop, more cars drove down our street and it was no longer safe for me to ride on the street so I had to make a change and find alternatives if I wanted to continue my hobby. I did not go to the township and request that they change roads, or stop developing because of my hobby. I don't have a problem with pilots wanting to enjoy their hobby of flying airplanes however I do not believe that I should have to subsidize their hobby or one's flying business. If they don't feel safe landing their airplane at Lake Elmo Airport there are other airports within 20 miles.

**91G**

**91H** | I especially feel that government funds going towards this project only to benefit a few pilots at the cost of many taxpayers does not warrant this expansion particularly when there is an airport that is 30 some minutes away. At the Public Hearing on April 4 about the airport a representative from the Chambers of Commerce of New Richmond stood before MAC representatives and stated that their airport could handle the request made by pilots for a larger runway.

Sincerely,  
Denise Cornell  
2733 Neal Ave. N.  
West Lakeland, MN 55082



TO: Federal Aviation Administration, Attention Andrew peek

6020 28<sup>th</sup> Ave, South, room 102

Minneapolis, MN 55450

April 17, 2018

FAA - Division  
MINNEAPOLIS  
APR 23 2018

Dear Mr. Andrew Peek

REC'D

92A

I am writing in response to the Lake Elmo Airport Expansion in which I am totally against and to the re-routing of a local high traffic road 30<sup>th</sup> Street on the south side of the airport due to MAC wanting to implement a 1965 long term plan to lengthen runway 14/32 in which the airport would have the potential of bringing larger aircraft & the flight path closer to our home. This airport has been perceived

92C

and used as a recreational airport for the past 31 years that we have lived in West Lakeland. The MAC  
... what nor do they control what flies in or out of the

92B

We have asked MAC over the past 30 years many questions and always got vague answers to simple questions like the ones listed below:

92D

1. How is it that MAC updates a long term comprehensive plan, expecting the townships to just ok it and change zoning around the airport when the airport is no longer compliant with the zoning already established for 60 years? The townships long term comprehensive plans are the ruling documents at the local level not the other way.

92E

2. Why is it that MAC never attended any planning meetings or public hearings when land around the airport was being developed?

92F

3. How is it that MAC has spent almost a million dollars preparing for this long term comprehensive plan, having an Environmental impact study done prior to the plan being accepted by the townships?

92G

4. Why is it that MAC started this plan/project back in 2013 long before coming to the townships to indicate a change from previous plans?

92H

5. Where's the cost analysis to prove this is good use of FAA money when the airport population has been declining for the past 30 years?

92I

6. Where is the data to prove the statement that larger aircraft won't come to the Lake Elmo Airport after completion?

7. Why is it that MAC does not have data to support larger aircraft won't come to this airport?

7a. Mac should have data to support once the airport runway is lengthened, larger aircraft will come to Lake Elmo where is this study?

92J

8. How can MAC claim the longer runway is needed for safety of the existing users of the Lake Elmo Airport?

8a. If it's not safe for the pilots now aren't they in danger of personal injury now?

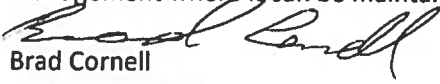


- 8b. How is it that MAC can claim the local neighbors are safe today when pilots claim it's dangerous to fly out from Lake Elmo Airport?
- 8c. Isn't it the pilots' responsibility to themselves and others to fly safely?
- 92J** 8d. If the need for safety is the primary issue, then why has MAC not managed the based aircraft for proper size nor the transient aircraft using the airport for safe operations but allowed miss use?
9. How can MAC put over 1500 users of 30<sup>th</sup> street at risk with a multi curved road where a straight 50MPH road exists today as a major township road for commuting to and from work every day?
- 92K** 10. Why is it that MAC believes this is not expansion, adding lighting to a non-lit runway, Adding terminal lighting for night operations, Adding more taxis ways, constructing run-up locations near neighbors to name a few new additions that create noise, light pollution that is neither present today nor consistent with the voluntary noise abatement in place today?
- 92L** 11. Why is it that MAC can ignore state rules for safety zones wouldn't MAC want to be compliant to  
 All of the above. All of these indicate flight operation expansion heavier use, more noise will be disruptive to the neighbors.
- 92M** 12. MAC needed to provide a detailed cost analysis of each alternative proposal in detail, to justify the costs differences? This would enable the residents and MAC to discuss each of these substantial differences of how much?
- 92N** 13. Provide detailed cost return on investment analysis for the federal money to acquire property over the life of the airport improvements over the life of the airport?
14. Provide the cost benefit between closing and just provide minimal updates?
- 92O** 15. Wouldn't actually closing generate a significant financial benefit for MAC to return this unused land back to the owners, 640 acres as prime real estate in the metro area is a substantial dollar amount in land alone, on the order of 256 2.5 acre home sites at a rough retail cost of \$200,000 each is \$51.2 million plenty to assist the current residents of the airport to move to different airports?
- 92P** My last comments: The MAC planning team and upper management has been poor neighbors for the past 30 years. The only time they come to our town meeting is to bring planning changes that are not welcome with any consideration to the neighborhood. The pilots at Lake Elmo for the most part are considerate, although there are a few who don't stay in the zones, fly low, wait till late to do night take off and landings to name a few. The transient users are helicopters from down town to do practice; all they do is create noise, loud noise even at late hours with no regard to neighbors and MAC does nothing about it. MAC has a noise complaint web site but you have never provided statics on how many complaints or done the research to see who is creating the noise, why is this?
- 92R**
- 92S**
- 92T** I truly believe this project is to bring larger aircraft to Lake Elmo in an attempt to keep it from closing because of continued lower use of the airport in the past 30 plus years. The days of this plan for expansion is long gone, like 50+ years past. It wasn't needed in 1965 it's not needed now with even fewer operations declining every year. MAC needs to realize this plan is obsolete and the cost of almost a million dollars was a waste and they should accept the existing size, classify it as recreational or close
- 92Q**
- 92U**

**92V**  
**92X, 92Y**

it. Rebuilding the existing runways if needed but remove the onsite helicopter support, keep the trees to minimize the light and noise pollution, a solid fence that is proposed is just a bad eye sore. MAC does not even maintain the existing chain link fence installed post 911; one look at it along 30<sup>th</sup> street and Neal show the lack of MAC support. This does demonstrate MAC's management does not support this airport being maintained. That is why the runways are in poor condition and only now attempting to justify sending money on the Lake Elmo Airport by expanding the services to accommodate or attract larger aircraft and keep it in the MAC reliever system. MAC should return this airport to MNDOT for management where it can be maintained and follow state rules.

**92AA**



Brad Cornell  
2733 Neal Ave. N.  
West Lakeland, MN 55082

**92W**

**92Z**

**92AB**

April 15, 2018

To: Mr. Chad Leqve – Director

Subject: Lake Elmo Airport Expansion Opposition

Mr. Leqve –

**93A** | I am opposed to any expansion at the Lake Elmo Airport. I am very concerned about the recent issues with contaminated groundwater. You have stated in the EAW that our wells would not be affected by any construction done at the Lake Elmo Airport. Yet no evidence has been presented as to how this will be prevented. If your plan does not work and our water becomes contaminated what is the plan to fix this? We are not on city water and sewer.

**93C** |

**93B**

**93D** | Also, I have always been confused by how the purpose and need of the MAC (unelected officials) is more important than the neighboring municipalities and their elected officials. Elected officials represent many more people than the small number of pilots at the airport.

**93E** | Please re-consider this plan and repair the runway in its current position.

Thank you,

  
Laura Kaschmitter

CC: Senator Karin Housley  
Representative Kathy Lohmer  
Mr. Andrew Peek – Federal Aviation Administration

FAA - DMA ADD  
MINNEAPOLIS  
APR 25 2018  
RECEIVED

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## Appendix N – Municipal/Agency Comments and Responses

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Municipal/Agency Comment Summary	N-1
Municipal/Agency Comment Response Matrix	N-2 thru N-129
Municipal/Agency Comment Letters and Emails	N-130 thru N-187

## **Municipal/Agency Comments and Responses**

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### **Introduction**

A Draft EA/EAW for proposed improvements at Lake Elmo Airport was issued for public and agency review and comment on February 26, 2018. Written comments were accepted until the comment period closed at 5:00 pm April 19, 2018.

During the public comment period, the MAC received comment letters from nine municipalities and agencies, including the following:

- Minnesota Department of Agriculture
- Minnesota Department of Transportation
- Minnesota Department of Natural Resources
- Valley Branch Watershed District
- Washington Conservation District
- Washington County Public Works Department
- Minnesota Pollution Control Agency
- U.S. Environmental Protection Agency
- West Lakeland Township

These comment letters, and detailed matrices with responses to each comment, are included in this appendix.





## Responses to Municipal/Agency Comments

Commenter	Representing	Date of Correspondence	Comment IDs	See Pages
Becky Balk	Minnesota Department of Agriculture	February 27, 2018	1	1-3
Jennifer Wiltgen	Minnesota Department of Transportation	March 21, 2018	2-4	3-4
Rebecca Horton	Minnesota Department of Natural Resources	April 13, 2018	5-13	4-8
Jill Lucas	Valley Branch Watershed District	April 13, 2018	14-23	8-14
Jay Riggs	Washington Conservation District	April 18, 2018	24-32	14-18
Wayne Sandberg	Washington County Public Works	April 19, 2018	33-34	18
Karen Kromar	Minnesota Pollution Control Agency	April 19, 2018	35-36	18-19
Kenneth A. Westlake	U.S. Environmental Protection Agency	April 19, 2018	37-38	19
Thomas E. Casey	West Lakeland Township	April 17, 2018	39-146	19-103
Thomas E. Casey	West Lakeland Township	April 18, 2018	147	104-106
Stuart Grubb	West Lakeland Township	April 10, 2018	148-168	106-124
Ryan Stempski	West Lakeland Township	March 14, 2018	169-175	124-128

Commenter	ID	Subject	Response
Minnesota Department of Agriculture, Agricultural Marketing & Development Division, Email dated February 27, 2018	1	<p>Thank you for the opportunity to comment on the Lake Elmo Airport – Draft Federal EA / State EAW. The Minnesota Department of Agriculture would like to comment on the potential loss of farmland resulting from Alternative B.</p> <p>The MDA recommends that the EA/EAW address the acreage or impact of severed, triangulated, or isolated farmland resulting from the proposed alignment of 30<sup>th</sup> Street potentially impacting the parcel located in southwest corner of 30<sup>th</sup> Street and Neal Avenue as indicated in Alternative B.</p> <p>The impact may be farming remnants that are difficult from a practical standpoint. There may be</p>	<p>Alternative B as referenced in this comment corresponds to 30<sup>th</sup> Street North Alternative 3, which USDA referenced as Alternative B in the attachment to the completed Form AD-1006 contained in Appendix G. The Form AD-1006 identified approximately 7.6 acres of uneconomic remnants under this alternative and considered them as “indirect impacts.”</p> <p>The area on the southwest corner of 30<sup>th</sup> Street and Neal Avenue is currently Airport property. Following realignment of 30<sup>th</sup> Street, the area north of the new road segment would be contiguous with agricultural</p>

Commenter	ID	Subject	Response
		<p>a problem of getting to the field and once there, problems of maneuvering farm equipment on the field. Also, smaller fields that are oddly shaped may be less valuable than fields of typical dimension and size. The parcels of farmland should be identified by location and acreage. Any loss of that farmland should be included in the farmland conversion impact rating.</p>	<p>fields on Airport property north of the existing road segment. As a result, this area is not expected to have access or equipment maneuvering issues.</p> <p>The MAC acknowledges that row crop production may be challenging in the area south of the realigned road segment. In response to this comment, the MAC requested that USDA re-calculate the farmland impact conversion rating to consider the area south of the proposed realigned segment of 30<sup>th</sup> Street North as an indirect farmland impact, as this area may be considered severed, triangulated, or isolated per MDA's comments. The total farmland acres to be converted indirectly were increased on USDA Form AD-1006 from 7.59 to 28.82 acres. The additional 21.23 acres encompass MAC-owned property currently in agricultural production south of the proposed realigned segment of 30<sup>th</sup> Street North. Based on the revised Form AD-1006 from USDA, the farmland to be converted as a result of the preferred alternative has a total value of 136 points, which does not exceed the 160-point threshold for additional consideration and analysis of farmland protection or alternative sites. The findings have been updated accordingly in Section 5.6 of the Final EA/EAW, and the revised Form AD-1006 is included in Appendix G of the Final EA/EAW.</p> <p>Based on farmland value scores calculated in coordination with the USDA NRCS, there are no significant impacts associated with either the no-action or preferred alternatives, as defined by the</p>

Commenter	ID	Subject	Response
			federal Farmland Protection Policy Act, NEPA, and MEPA.
Minnesota Department of Transportation, Metropolitan District, Letter dated March 21, 2018	2	<b>Traffic:</b> MN 5 was a turnback to Washington County. The alternatives 4A & 4B shown on Pg. 41 have speed limits shown. If there is a current speed limit authorization for this location it will not remain valid due to the reconstruction. Speed limits would revert to statutory limits unless the road authority were to request a speed study. For questions regarding these comments please contact Kaare Festvog at 651-234-7814 or <a href="mailto:kaare.festvog@state.mn.us">kaare.festvog@state.mn.us</a> .	MN 5 is located approximately one-half mile north of the Airport and will not be affected by the proposed action. Speed limits shown for alternatives 4A & 4B are based on applicable federal, state, and local design guidelines for the road geometry and location, as described in Appendix B. A speed study cannot be requested from MnDOT until construction of the realigned road is completed, as MnDOT bases such studies on actual sample speed data for the affected road segment. A speed study will be requested following construction. Speed limit signs have been removed from all graphics in response to this comment.
Minnesota Department of Transportation, Metropolitan District, Letter dated March 21, 2018	3	<b>Permits:</b> Any use of or work within or affecting MnDOT right of way requires a permit. Permit forms are available from MnDOT's utility website at <a href="http://www.dot.state.mn.us/utility/index.html">http://www.dot.state.mn.us/utility/index.html</a> . Please include one to one set of plans formatted to 11x17 with each permit application. Please submit/send all permit applications and 11x17 plan sets to: <a href="mailto:metropermitapps.dot@state.mn.us">metropermitapps.dot@state.mn.us</a> . Please direct any questions regarding permit requirements to Buck Craig (651-234-7911) of MnDOT's Metro Permits Section.	At this time, no use of or work within or affecting MnDOT right of way is proposed. Therefore, a MnDOT permit will not be required. If that changes during final design, MAC will follow the MnDOT permitting process.
Minnesota Department of Transportation, Metropolitan District, Letter	4	<b>Review Submittal Options:</b> MnDOT's goal is to complete the review of plans within 30 days. Submittals sent electronically can usually be turned around faster. There are four submittal options:	No use of or work within or affecting MnDOT right of way is proposed. Therefore, a MnDOT permit will not be required and these review submittal options do not apply to the proposed action.

Committer	ID	Subject	Response
dated March 21, 2018		<ol style="list-style-type: none"> <li>1. One (1) electronic pdf version of the plans. MnDOT accept plans at metrodevreviews.dot@state.mn.us provided that each e-mail is less than 20 megabytes.</li> <li>2. Three (3) sets of full size plans. Although submitting seven sets of full size plans will expedite the review process. Send plans to: MnDOT – Metro District Planning Section, Development Reviews Coordinator, 1500 West County Road B-2, Roseville, MN 55113.</li> <li>3. One (1) compact disk.</li> </ol> <p>Plans can also be submitted to MnDOT’s External FTP Site at:  ftp://ftp2.dot.state.mn.us/pub/incoming/MetroWatersEdge/Planning. Internet Explorer may not work using FTP so use an FTP Client or your Windows Explorer (My Computer). Notify metrodevreviews.dot@state.mn.us indicating the plans have been submitted on the FTP site.</p>	
Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018	5	Section 4.3 Geology, Soils, and Topography Karst features occur on airport properties and potential sinkholes have been mapped within the area. While not field checked by DNR, there is a potential sinkhole located in the northwest part of the Airport (north of 40 <sup>th</sup> Street North, in an area where no work is planned). The Minnesota Geospatial Commons is a website that houses numerous geospatial resources, included on this website is a “Karst Feature Inventory Points” data layer that can be downloaded and utilized to	Section 4.3 acknowledges the possibility of karst sinkholes on Airport property, but that the locations of such features are unknown until detailed geotechnical investigations are completed. These investigations will be conducted during project design to determine whether any sinkholes are present in the ground disturbance area associated with the project. Mead & Hunt reviewed the Karst Feature Inventory Points data layer referenced in MDNR’s letter and found the Inventory Points identify eight potential karst features on or within one mile of Airport property. The two

Commenter	ID	Subject	Response
		inspect the potential for karst features within the area of the Airport. We recommend this GIS layer be looked at, and suggest that a geophysical investigation of the work areas be conducted to ensure the unknown karst features do not exist in these areas. Additional information on karst can be found at the websites included at the bottom of this layer.	features on Airport property on either side of 30 <sup>th</sup> Street North were identified by Mead & Hunt's archaeologist as potentially historic limestone building foundations and therefore not karst features or sinkholes. Of the eight karst features, only one has been field verified and this feature is not within the potential area of ground disturbance. For these reasons, Mead & Hunt considers this data layer unreliable and does not recommend including any information about the identified features in the EA/EAW. Geotechnical investigation will be conducted during design to determine whether karst sinkholes exist in the area of ground disturbance.
Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018	6	Section 4.5.1 Groundwater: While not likely to impact any EIS need decisions for this project, DNR groundwater staff found the groundwater flow discussion incorrect. The water table and Mt. Simon aquifers flow to the St. Croix. The Prairie du Chien, Jordan, and Tunnel City-Wonewoc aquifers have a groundwater divide across the VBWD in which water on the west flows toward the Mississippi and water to the east flows toward the St. Croix. See Plate 5 of Washington County GW Atlas.	As shown on Plate 5 of the Washington County Geologic Atlas ( <a href="https://conservancy.umn.edu/handle/11299/58492">https://conservancy.umn.edu/handle/11299/58492</a> ), the dominant groundwater flow direction for the water table and all aquifers beneath the Airport is east toward the St. Croix River. Some of the aquifers located beneath the Airport also flow toward the Mississippi from some areas west of the Airport. This has been added to Section 4.5.1 of the Final EA/EAW.
Minnesota Department of Natural Resources, Ecological and Water Resources,	7	Section 4.5.2 Lakes: The number of public waters and public water wetlands within a two-mile radius of the Lake Elmo Airport is incorrect. In addition to the six lakes listed, there are an additional 15 public water wetlands within a two-mile radius. For each of the public waters and public water wetlands	All MDNR public waters are shown in Figure 4-10. Public water lakes described in Section 4.5.2 do not include all public waters within a two-mile radius that are not lakes. The Airport does not drain directly to any public water wetlands other than PWI #82046100 (see subsequent Comment 4 below) and therefore no other public water wetlands will be affected by the



<b>Commenter</b>	<b>ID</b>	<b>Subject</b>	<b>Response</b>
Letter dated April 13, 2018		within the two-mile radius, please list their PWI number for identification purposes.	proposed action. This information has been added to Sections 4.2 and 4.6 of the Final EA/EAW.
Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018	8	Section 4.5.2 Lakes: There is one public water wetland (PWI #82046100) located on MAC property. Please include this fact and a description of this public water wetland in this section.	This wetland is identified as Public Water wetland 82-461W (same as PWI #82046100) in Figure 4-10, is referred to as Wetland 1 in the descriptions of delineated wetlands in Section 4.5.6 and is an isolated wetland with no downstream connections. The location of the ordinary high-water level (OHWL) of this public water wetland is compared to the delineated wetland boundary in Appendix C.
Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018	9	Section 4.5.2 Lakes: Please include a figure showing the location of the public waters and public water wetlands relative to the Airport property. Locations of Public Waters (PW) Basin and Watercourse Delineations data is available on the Minnesota Geospatial Commons website. In addition, a DNR Public Waters Inventory map for Washington County can be used to represent their locations.	All MDNR public waters are shown in Figure 4-10. The full Washington County public waters map is included in Appendix C.
Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018	10	Section 4.5.6 Wetlands: The wetland area identified as Wetland 1 is also part of public water wetland 82046100. The boundary between the NWI portion of this wetland and the public water wetland portion of this wetland is the ordinary high-water level (OHWL) elevation. The OHWL is DNR's jurisdictional elevation. Activities at and below the OHWL are subject to state public water work permit rules.	The project is not envisioned to include any activities at or below the ordinary high-water level (OHWL) of public water wetland 82046100, as the OHWL elevation is lower than the field delineated boundary for Wetland 1. The slope intercepts associated with the proposed realignment of 30 <sup>th</sup> Street North should not extend into the OHWL of public water wetland 82046100. See response to MDNR Comment ID 8 above.
Minnesota Department of Natural	11	Section 4.5.6 Wetlands:	Existing and proposed normal water elevations and the critical water level produced from the 100-year 24-hour storm and the 100-year 10-day snowmelt

Commenter	ID	Subject	Response
Resources, Ecological and Water Resources, Letter dated April 13, 2018		How would filling of the wetlands north of 30 <sup>th</sup> Street North impact the water level of and flow into public water wetland 82046100?	event will be reviewed during design to determine if there is a reduction in the wetland storage volume in the immediate watershed. If so, the MAC will determine the action needed to provide for the loss of wetland storage volume.
Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018	12	Section 5.2.2 Listed Species: While the EA/EAW identifies that the project may pose impacts to the state-listed Blanding's turtle, and how impacts may occur, it does not identify mitigation measures that the project proposer will employ to avoid or mitigate potential impacts. Please identify specific avoidance measures that will be employed as part of the project to avoid impact this rare turtle, in addition to posting the Blanding's turtle Factsheet/Flyer at the construction site.	Mitigation options identified by the MDNR letter and discussed in EA/EAW Appendix F include: <ul style="list-style-type: none"> <li>- Avoid filling or dewatering wetlands during the winter.</li> <li>- Implement stringent sediment and erosion control methods.</li> <li>- Use wildlife-friendly erosion control methods.</li> <li>- Monitor for turtles during construction and report any sightings to the MDNR.</li> <li>- Turtles which are in imminent danger should be moved, by hand, out of harms way. Turtles which are not in imminent danger should be left undisturbed.</li> <li>- Silt fencing should be set up to keep turtles out of construction areas. It is critical that silt fencing be removed after the area has been revegetated.</li> </ul> These specific measures are noted in Section 5.2.2 of the Final EA/EAW.
Minnesota Department of Natural Resources, Ecological and Water Resources,	13	Table 5-6: As a reminder, in addition to the permits listed, any construction dewatering that exceeds 10,000 gallons per day, or one million gallons per year, must be approved under a DNR Water Appropriation Permit.	Dewatering will be limited to areas of wetland fill and will not include appropriation of groundwater from below the water table. Worksite dewatering related to the construction activity in amounts that exceed 10,000 gallons per day (gpd) require contractors to obtain necessary permits from the MDNR and Minnesota Department of Health. Dewatering

Commenter	ID	Subject	Response
Letter dated April 13, 2018			volumes associated with the project are not expected to exceed these thresholds.
Valley Branch Watershed District, Letter dated April 13, 2018	14	The comments in this letter are not an approval of the project by VBWD. A VBWD permit and VBWD approval of Minnesota Wetland Conservation Act-related project elements will be required prior to construction of any of the alternatives discussed in the EA/EAW.	Comment noted. Required permits and approvals are set forth in EA/EAW Table 5-6.
Valley Branch Watershed District, Letter dated April 13, 2018	15	VBWD is the local government unit (LGU) for administering the Minnesota Wetland Conservation Act (WCA). The EA/EAW states that 2.36 acres of wetland will be directly impacted by the preferred alternative. To conform to the WCA, wetland impacts must be avoided. If they cannot be avoided, they must be minimized. As noted in the EA/EAW, wetland impacts will need to be mitigated and the mitigation is likely to be completed through the purchase of wetland banking credits. If VBWD were to approve the wetland impacts, VBWD strongly encourages the Metropolitan Airports Commission (MAC) to complete the mitigation within the same watershed and as near to Lake Elmo Airport as possible to minimize the hydrologic impact of the lost wetlands on site.	<p>Comment noted. The Wetland Conservation Act sequencing requirements are described in Section 4.5.6.</p> <p>The alternatives analysis in Chapter 3 did not identify a primary runway alternative that meets the Purpose &amp; Need presented in Chapter 2, satisfies the initial screening criteria described on Page 3-12, and completely avoids wetland impacts. Minimization of wetland impacts was a key consideration in selection of the preferred alternative, and the primary runway alternative that minimizes wetland impacts was chosen as the preferred alternative, as shown in Table 3-3 on Page 3-29 of the EA/EAW. As stated in Section 5.14.1 of the EA/EAW, the MAC will consider wetland banking opportunities during the permitting process according to the wetland replacement priorities defined in the WCA statute. During design, the MAC will undertake efforts to further reduce and minimize the impacts.</p>
Valley Branch Watershed District, Letter	16	VBWD also requires that “any wetland alteration shall not reduce the existing storage volume in the immediate watershed...” Required wetland mitigation in #2, above, could then be	The MAC does not propose to create on-site compensatory storage given wildlife hazard concerns.

Commenter	ID	Subject	Response
dated April 13, 2018		accomplished with the creation of onsite compensatory storage.	MAC will consider using wetland bank credits to mitigate for wetland impacts associated with the preferred alternative.
Valley Branch Watershed District, Letter dated April 13, 2018	17	<p>The EA/EAW appears to incorrectly cite VBWD’s rule for wetland buffers. The EA/EAW states that VBWD requires a 25-foot minimum wetland buffer between the wetland and impervious surfaces. VBWD actually requires wetland buffers to be established around all wetlands, regardless of their proximity to impervious surfaces. Furthermore, there are also several requirements for the buffers that may not have been taken into account. Such requirements include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>a. “...a minimum 25-foot vegetative buffer strip immediately adjacent and contiguous to the delineated wetland boundary or the Ordinary High Water Level (OHW), whichever is greater in elevation...”</li> <li>b. “Buffer vegetation shall not be cultivated, cropped, pastured, mowed, fertilized, subject to the placement of mulch or yard waste, or otherwise disturbed...”</li> <li>c. “No new structure or impervious surface shall be placed within a buffer.”</li> <li>d. “No fill, debris, or other material shall be excavated from or placed within a buffer without VBWD approval.”</li> </ul> <p>The language in the EA/EAW regarding wetland buffers should be revised, and the final design and permit application will need to consider all</p>	Based on initial review of wetland fill activities described in Section 5.14.1 of the EA/EAW, the buffer requirements can be met within the estimated areas of wetland impact identified in Figure 5-4. All vegetative buffer requirements listed in the VBWD rules and regulations will be incorporated into the project during final design and permitting. This information has been added to Section 5.14.1 of the Final EA/EAW.

Commenter	ID	Subject	Response
		aspects of wetland impacts and required mitigation and buffers.	
Valley Branch Watershed District, Letter dated April 13, 2018	18	Vegetation is typically mowed immediately adjacent to an impervious surface. Mowed areas are not allowed within wetland buffers, except for a maximum 6-foot-wide access path, so any mowed areas adjacent to impervious areas, such as the rerouted 30 <sup>th</sup> Street N, cannot be counted in the wetland buffer. The mowed areas and their potential impact on minimum and average wetland buffers will need to be taken into account during final design and permitting.	Specific vegetative buffer designs will be incorporated into the project during final design and permitting. There is the possibility of planting short grass species within the buffers that do not require mowing. Maintenance plans for the areas adjacent to the realigned 30 <sup>th</sup> Street North would need to be coordinated with the future road owner.
Valley Branch Watershed District, Letter dated April 13, 2018	19	The EA/EAW states that West Lakeland Township requirements for stormwater management are the most stringent requirements and require 0.55 inches of runoff from the new and fully reconstructed impervious surface on the site, or 1.1 inches of runoff from the net increase in impervious area on the site. As cited in the EA/EAW, VBWD's standards, per Rule 2, Standard 6B, require 1.1 inches of runoff be retained on site from new or reconstructed surfaces. This standard is more stringent than the West Lakeland Township standard and should be used when sizing stormwater management practices during final design.	As stated under Washington Conservation District (WCD), Comment ID 31 below, the West Lakeland Township stormwater quality standards are identical to the VBWD standards, but the Township requires a HydroCad model, which will be provided during design. This information has been added to Section 5.14.2 of the Final EA/EAW. The design will incorporate the most stringent applicable storm water standards practicable in consideration of FAA guidance on creating a wildlife attractant, which does not allow for retention or permanent pools.
Valley Branch Watershed District, Letter dated April 13, 2018	20	Figure 5-5 provides conceptual layout of proposed storage and infiltration basins for stormwater management. Available soils data indicates that most of the Airport site has hydrologic soil group B soils, indicating that infiltration may be feasible; however, multiple infiltration basins are located	Basin locations shown in Figure 5-5 are conceptual. Geotechnical investigations will be conducted during design to determine infiltration capacity and final locations of stormwater basins will be identified at that time, and a properly designed infiltration system to accommodate a design volume based on the required

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		<p>near wetlands. Wetlands are usually wet because the soil is typically hydrologic group C or D soils that do not infiltrate well. Soil borings and infiltration tests will be necessary to confirm soil types and infiltration capacity to ensure that stormwater management at the site will function as designed and meet VBWD performance standards.</p>	<p>water quality volume will be completed. If it is determined that soils have a low infiltration capacity (less than 0.06 inches per hour), the Minnesota Pollution Control Agency (MPCA) Construction General Permit will be followed which prohibits infiltration when an infiltration system will be constructed in areas of predominately low infiltration capacity soils. It may be possible for sites to partially or fully meet infiltration objectives if design modification such as amending the soil are incorporated.</p> <p>NRCS soil maps were used to identify soils and relationship to basin locations. Design will attempt to achieve retention from the proposed impervious surfaces and remove 75% of the annual total phosphorus load leaving all points on the site as required by the VBWD permit. Infiltration facilities will be located in permeable soils and a minimum 3-foot distance from the seasonally high-water table. During the design soil borings will be taken at the proposed infiltration facilities to classify the soil so that the infiltration rate can be determined.</p>
<p>Valley Branch Watershed District, Letter dated April 13, 2018</p>	<p>21</p>	<p>Nearby wetlands may also signify high local groundwater, which may impact the ability to infiltrate stormwater runoff, both from a soil capacity standpoint and the 3-foot-minimum distance required between the bottom of the infiltration area and the seasonally high-water table. A determination of the seasonally high groundwater table will be necessary to ensure infiltration will be feasible.</p>	<p>See response to VBWD Comment ID 20 above.</p> <p>During preliminary design, geotechnical investigations will be conducted to confirm the soil capacity and distance between the basin and seasonally high-water table. Where infiltration is prohibited, for example because of a seasonally high water table, water quality and volume control (or remainder of volume if partial infiltration can be achieved) will be</p>



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			provided by a filtration system or equivalent method per NPDES/SDS permit requirements.
Valley Branch Watershed District, Letter dated April 13, 2018	22	The project will impact hydrology to multiple landlocked basins. The final design and permitting will need to conform to VBWD hydrologic standards in VBWD Rules 2 and 5.	<p>Comment noted. The MAC acknowledges that all VBWD rules and regulations will need to be satisfied during project design and permitting. These requirements will be incorporated into the final design for the project.</p> <p>The final design of storm water management and snowmelt runoff rates will be managed so that future peak rates of runoff leaving the development are below or equal to the existing rates and that storm water volume will be controlled.</p>
Valley Branch Watershed District, Letter dated April 13, 2018	23	As proposed, the project would fill 0.06 acres of wetlands within a Zone A floodplain. The final design will need to conform to the VBWD Rule 5 standard regarding filling in the floodplain.	<p>The MAC acknowledges that all VBWD rules and regulations will need to be satisfied during project design and permitting.</p> <p>In response to this comment, the topographic information used by the VBWD (MN DNR 2011 LiDAR Data) to determine the 1%-Annual-Chance Flood Elevation of Peak Annual Water Elevations (NAVD88) for MDNR protected water 82-461W (West Lakeland Township Ponds) was used to evaluate the effect of floodplain fill volumes associated with the realignment of 30<sup>th</sup> Street. Under VBWD Rule 5, <i>Floodplain Management</i>, fill volumes in lakes, ponds, and other flood storage sites “shall be limited so that the cumulative effect of all possible filling will not raise the 100-year flood level more than 0.1 foot.” According to the most recent VBWD analysis of flood levels within the Downs Lake Watershed, dated</p>

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			<p>October 7, 2016, the 1%-Annual-Chance Flood Elevation of the West Lakeland Township Ponds is 919.2 feet above sea level. Based on preliminary design profiles for the realigned segment of 30<sup>th</sup> Street North, approximately 1,120 cubic yards (CY) of earthen fill would be placed within the floodplain boundary mapped by VBWD and below the 1%-Annual-Chance Flood Elevation estimated by VBWD. The estimated existing flood storage volume of the West Lakeland Township Ponds, using 919.2 feet as the 100-year flood elevation, is 286,650 CY. Based on comparison of the 1,120 CY fill volume to the existing 286,650 CY existing flood storage volume, the 100-year flood level is not expected to rise by more than 0.1 foot as a result of the realignment of 30<sup>th</sup> Street North. This information has been incorporated in Section 5.14.3 of the Final EA/EAW.</p> <p>Based on the above, the estimated net loss of floodplain storage is not significant when considering the flood volumes associated with the 1% annual chance flood, and there would be no notable adverse impacts on natural and beneficial floodplain values, as defined by DOT Order 5650.2, <i>Floodplain Management and Protection</i>, associated with the preferred alternative. The watershed district permit will be acquired by the MAC prior to construction and will fulfill permitting requirements related to floodplains.</p> <p>No hydraulic modeling has been completed for this project to confirm the floodplain elevations set by</p>

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			VBWD. Field survey and modeling will be performed during design to verify the 100-year flood elevation and demonstrate that the project will not result in an increase in the floodplain elevation.
Washington Conservation District, Letter dated April 18, 2018	24	Section 5 – Biological Resources; Section 5.2.2 Listed Species: the restoration on tallgrass prairie would provide critical habitat for the Rusty Patched Bumble bee and other pollinator species. Minimize pesticide drift from agricultural lands to the south and west. Consider alternate locations or creation of a windbreak to minimize exposure to pesticides.	MAC is voluntarily considering creation of habitat for this species at a location that is compatible with Airport operations. Alternate sites on Airport property were considered during development of the EA/EAW. The proposed location was selected because of its location outside the Airport perimeter fence, to minimize wildlife hazards as recommended by the USDA Wildlife Services. If the MAC decides to move forward with development of the pollinator habitat, windbreak components will be evaluated. Windbreaks in the form of trees also provide overwintering habitat for the rusty patched bumble bee.
Washington Conservation District, Letter dated April 18, 2018	25	Section 5 – Biological Resources; Section 5.2.2 Listed Species: The Rusty Patched Bumble Bee often overwinters in or near woodlands and forages on woodland ephemeral flowers in the spring. Maintain and enhance woodlands for habitat. Consider placement of prairie restoration adjacent to existing woodlands for habitat heterogeneity.	Comment noted.
Washington Conservation District, Letter dated April 18, 2018	26	Section 5 – Biological Resources; Section 5.7 Hazardous Materials, Solid Waste, and Pollution Prevention: The document notes “Based on the information above, there are no hazardous materials or solid waste impacts expected for	One of the industrial activities the MAC undertakes at the Airport with potential to impact storm water runoff is pavement deicing. The MAC does not expect that the project would result in a substantial increase in overall chemical pavement deicer use. As noted in

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		<p>either the preferred alternative or the no-action alternative.” Will there be an increase or change in chemicals used as part of the Airport expansion? What are the control measures proposed for chemicals stored and used onsite as part of normal airport operations, such as salt and other deicers?</p>	<p>Section 5.14.2, the Airport’s current stormwater pollution prevention plan (SWPPP) will be revised to reflect the additional impervious surface on the airfield and any associated new mitigation practices. Below are some best management practices the MAC employs under the current SWPPP to reduce the potential for storm water impacts from pavement deicing:</p> <ul style="list-style-type: none"> <li>- Use mechanical means to remove snow and ice from pavements to reduce use of pavement deicer.</li> <li>- Chemical pavement deicer use is primarily reserved for runways and critical taxiway areas.</li> <li>- Chemical pavement deicer is stored indoors.</li> <li>- Deicer application rates are reviewed annually to optimize rates and prevent over-application.</li> <li>- Employees are trained annually regarding application rates to reduce potential for over-application.</li> </ul>
<p>Washington Conservation District, Letter dated April 18, 2018</p>	<p>27</p>	<p>Section 5 – Biological Resources; Section 5.9 Land Use:</p> <ul style="list-style-type: none"> <li>- An updated MLCCS dataset was completed late last year and is available via the DNR.</li> <li>- The source of the MLCCS data used in the report is not Mead &amp; Hunt, but rather the DNR (and generated mostly by the WCD). Table 4.6 notation should be updated as well.</li> </ul>	<p>The acreage calculations shown in Table 4-6 are based on Mead &amp; Hunt’s analysis of the latest MLCCS data available on the Minnesota Geospatial Commons website (<a href="https://gisdata.mn.gov/">https://gisdata.mn.gov/</a>). Mead &amp; Hunt downloaded the data again on May 8, 2018, re-analyzed it, and found that the land cover types for each category on the Airport have not changed substantially from the acreages shown in Table 4-6.</p> <p>The source citation has been updated to include MDNR and WCD. Mead &amp; Hunt was included in the source citation because analysis and consolidation of</p>

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			<p>the MLCCS data was required to arrive at totals for the five general land cover types listed in the table. For example, the MLCCS dataset includes two categories for wetlands, which are combined in the table. In addition, some areas include both impervious surfaces and grassy areas within the same category, and Mead &amp; Hunt developed an estimate for each land cover type for these categories. This information has been added to Table 4.6 in the Final EA/EAW.</p>
<p>Washington Conservation District, Letter dated April 18, 2018</p>	<p>28</p>	<p>Section 5 – Biological Resources; Section 5.9 Land Use: Use of native vegetation and habitat restoration is encouraged in the open space areas, including native vegetated buffers around stormwater treatment systems.</p>	<p>Native vegetation and habitat restoration will be considered where it does not conflict with Airport operations or agricultural activity.</p>
<p>Washington Conservation District, Letter dated April 18, 2018</p>	<p>29</p>	<p>Section 5 – Biological Resources; Section 5.14.1 Wetlands: The TEP is for the MN WCA but can include the Corps. BWSR and WCD staff attended the TEP field review as well.</p>	<p>Comment noted. BWSR and WCD participation in the TEP field review is noted in the Minnesota Wetland Conservation Act Notice of Decision contained in Appendix C.</p>
<p>Washington Conservation District, Letter dated April 18, 2018</p>	<p>30</p>	<p>Section 5 – Biological Resources; Section 5.14.1 Wetlands: The WCA permitting process will address the avoidance, minimization, and mitigation of the proposed wetland impacts.</p>	<p>Comment noted. The alternatives analysis in Chapter 3 did not identify a primary runway alternative that meets the Purpose &amp; Need presented in Chapter 2, satisfies the initial screening criteria described on Page 3-12, and completely avoids wetland impacts. Minimization of wetland impacts was a key consideration in selection of the preferred alternative, and the primary runway alternative that minimizes wetland impacts was chosen as the preferred alternative, as shown in Table 3-3 on Page 3-29 of the EA/EAW. As stated in Section 5.14.1 of the</p>

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			EA/EAW, the MAC will consider wetland banking opportunities during the permitting process according to the wetland replacement priorities defined in the WCA statute. During design, the MAC will undertake efforts to further reduce and minimize the impacts. See response to Valley Branch Watershed District, Comment ID 15, above.
Washington Conservation District, Letter dated April 18, 2018	31	Section 5 – Biological Resources; Section 5.14.2 Stormwater: The EAW states the Township requirements are stricter than the VBWD. In fact, these rules are almost identical. In both rules the 1.1” new and redevelopment standard applies to the proposed airport expansion, not the 0.55” linear project redevelopment standard. The only difference between the two rules is the Township requires the submission of a 1-year storm event summary from the HydroCad model needed to fulfill the Watershed District permitting requirements (review provided by MSCWMO Administrator who worked with West Lakeland Twp to develop their stormwater rules).	Comment noted. This information has been added to Section 5.14.2 of the Final EA/EAW. The design will incorporate the most stringent applicable stormwater standards practicable in consideration of FAA guidance on creating a wildlife attractant, which does not allow for retention or permanent pools. See response to Valley Branch Watershed District, Comment ID 19, above.
Washington Conservation District, Letter dated April 18, 2018	32	Section 5 – Biological Resources; Section 5.14.2 Stormwater: The EAW indicates the site will meet Township and VBWD infiltration/volume control guidelines. WCD encourages the use of bioretention to meet the onsite volume retention standards. .... These systems are designed to be distributed throughout the site and treat small contributing drainage areas, breaking up larger catchments into smaller, more manageable parts. To ensure the long-term effectiveness of volume	Comment noted. Bioretention measures will be considered during final design.



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		control, a series of design specifications are presented for consideration. [See letter for complete list.]	
Washington County, Public Works Department, Letter dated April 19, 2018	33	Section 4.4.4 Washington County Zoning: In 2016, Washington County amended the Washington County Comprehensive Plan 2030, removing land use authority in West Lakeland Township with the exception of The St. Croix River District and Mining. West Lakeland Township has adopted the Washington County Development Code or a version similar to the document.	Comment noted. West Lakeland Township zoning on and near the Airport is described in Section 4.4.2 of the EA/EAW. Two sentences have been added to Section 4.4.4 to include the information from this comment.
Washington County, Public Works Department, Letter dated April 19, 2018	34	Section 4.5.5 Watersheds: The EAW acknowledges that the Airport is in the Valley Branch Watershed District (VBWD) and all rules and regulations of the district must be followed. Once the design plan has been completed for the project, the MAC must submit the drainage report and calculations for review of any downstream impacts to the county drainage system. Along with the drainage calculations, written conclusions explaining that the volume and rate of stormwater run-off into any county right-of way will not increase as part of the project.	Comment noted. The MAC will submit the required drainage report and calculations as an attachment to its VBWD permit application. The report attached to the VBWD permit application will include evaluation of downstream impacts to the county drainage system and written conclusions explaining that run-off to any county right-of-way would not increase as part of the project. The most stringent requirements will be used to aid the design engineer or applicant in the preparation of drainage reports, drainage studies, and construction drawings for stormwater and water quality management infrastructure.
Minnesota Pollution Control Agency, Letter dated April 19, 2018	35	Chapter 5, Environmental Consequence. On table 5-6, page 5-33, the MPCA Clean Water Act Section 401 Water Quality Certification should be moved from the Stormwater section to the Wetland section under the U.S. Army Corps of Engineers 404 permit. In addition, an antidegradation assessment should be included as part of the 401 certification.	Comment noted. Table 5-6 has been updated in the Final EA/EAW as MPCA requests. An antidegradation assessment will be included as part of the 401 certification.

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Minnesota Pollution Control Agency, Letter dated April 19, 2018	36	Chapter 4, Affected Environment. As noted in the EA/EAW, the MPCA declared two of the lakes within a two-mile radius of the Airport as impaired, Lake Elmo and Downs Lake. The Lake Elmo Airport's drainage flows into Downs Lake. For any water conveyance that may flow into the impaired waters, in-water best management practices such as silt curtain, construction during no/low flow periods, winter conditions, and the most appropriate type of coffer or check dams to minimize total suspended solids, must be implemented.	Comment noted. In-water best management practices will be integrated as required during design.
U.S. Environmental Protection Agency, Letter dated April 19, 2018	37	The Draft EA indicates that any groundwater monitoring wells will not be impacted or need to be moved by the preferred alternative. Please note that if monitoring wells need to be removed for either this or future projects, we recommend that they be properly sealed and replaced, and that any work be coordinated with the Minnesota Pollution Control Agency (MPCA).	Comment noted.
U.S. Environmental Protection Agency, Letter dated April 19, 2018	38	Please continue to coordinate with the MPCA regarding potential interactions with the monitoring wells or the Baytown Township plume. We also recommend continued coordination with the Minnesota Department of Transportation about impacts related to the relocation of the road, including levels of service, safety, road geometry, and community outreach.	Comment noted.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17,	39	On behalf of West Lakeland Township, I must first state that an Environmental Impact Statement (EIS) is mandatory because the project is "For construction of a paved and lighted airport runway	The proposed project does not trigger the mandatory EIS category under MEPA and the EQB rules. The proposed project will relocate the existing Runway 14/32 and extend the runway from 2,849 feet to 3,500

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2018 (on behalf of West Lakeland Township)		of 5,000 feet of length or greater ..." (Minnesota Rule 4410.4400, Sub. 15.) The proposed project paves and lights two runways, runway 14/32 (3,500 feet) and runway 4/22 (2,750 feet), totaling 6,250 feet. Minnesota Rule 4410.4400, Subp. 1, states in part, "Threshold test. ... Multiple projects and multiple stages of a single project that are connected actions or phased actions must be considered in total when comparing the project ... to the thresholds of this part." [Emphasis added.] Minnesota Rule 4410.0550, Subp. 60 defines "phased action as: "... two or more projects to be undertaken by the same proposer that ... A. will have environmental effects in the same geographic area ..." Therefore, the two runways must be considered in total and, as result, exceed the 5,000 feet threshold for a mandatory EIS.	<p>feet, an increase of 651 feet. In addition, the proposed project will extend existing Runway 4/22 from 2,496 feet to 2,750 feet, an increase of 254 feet. The project does not involve the new construction of a runway of 5,000 feet of length or greater, which is EIS threshold for Minn. R. 4410.4400, subp. 15.</p> <p>In addition, the proposed project for Lake Elmo Airport is a single proposed project, not "multiple projects" or "connected actions" or "phased actions", as the EQB rules define those terms.</p> <p>An EAW is appropriate under MEPA. The proposed project for the Lake Elmo Airport does not trigger the mandatory EIS threshold in Minn. R. 4410.4400, subp. 15.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	40	A mandatory EIS requires that the EAW "... be the basis for the scoping process ..." and that the scoping process be commenced pursuant to the requirements of Minnesota Rule 4410.2100.	As discussed above, the proposed project does not trigger a mandatory EIS under MEPA. Therefore, an EAW must determine whether the proposed project has a significant environmental effect and requires an EIS under MEPA. As the EA/EAW, these responses to comments, and the administrative record establish, the proposed project does not have the potential for significant environmental effects.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West	41	In the alternative, in the event the court rules that an EIS is not mandatory for this project, on behalf of West Lakeland Township, I submit the following comments to the Draft Federal Environmental Assessment (EA)/ State of Minnesota Environmental Assessment Worksheet (EAW) for	Comment noted. Under NEPA and MEPA, EAs and EAWs are appropriate where a proposed project may have the potential for significant impact. An EIS is necessary only when the project type falls into a mandatory EIS category under the Minnesota Environmental Quality Board (EQB) rules

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Lakeland Township)		<p>the proposed Lake Elmo Airport Runway 14/32 Relocation/Extension and Associated Improvements, in Washington County, Minnesota.</p> <p>The West Lakeland Township Board of Supervisors is very concerned about the impacts the proposed Lake Elmo Airport Runway Expansion would bring to the area. While West Lakeland Township acknowledges Metropolitan Airport Commission’s (MAC) efforts to date with regard to this project, the Board of Supervisors respectfully requests that MAC – as the Responsible Governmental Unit (RGU) – order a full Environmental Impact Statement (EIS) for this project so that all of its impacts can be analyzed and understood. An EIS is the only way for MAC officials to make a fully informed decision.</p>	<p>implementing MEPA, or under NEPA or MEPA an EA or EAW finds there is a significant environmental impact. Here, the EA/EAW establishes the proposed project does not have the potential for significant environmental impact. Therefore, an EIS is unnecessary and is not the “only way for MAC officials to make a fully informed decision,” as the comment suggests.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	42	<p>The EA/EAW is the appropriate “tool” to obtain a “snap shot” of a project and the impacts it will bring. West Lakeland Township insists, however, that because of the proposed project’s scope, immediate, and cumulative impacts, as well as its proximity to sensitive natural resources, the project possesses the potential for significant environmental effects and warrants the detailed review and scrutiny that only an EIS can provide.</p>	<p>Comment noted. Under NEPA and MEPA, the EA/EAW is a tool that analyzes the best information available at the time the document is prepared to determine whether the proposed project has the potential for significant environmental effects. Similarly, an EIS is a tool that also analyzes the best information available at the time the document is prepared to evaluate the environmental impacts from a proposed project that has already been determined to have the potential for significant environmental effects. An EA/EAW and an EIS are both “snap shots” that evaluate a proposed project’s scope, immediate impacts, and cumulative impacts, including a proposed project’s potential to affect sensitive natural resources. Because the EA/EAW establishes the</p>

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			proposed project does not have the potential for significant environmental impact, an EA/EAW is the appropriate environmental review tool under NEPA and MEPA for the proposed project.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	43	<p>West Lakeland Township asserts it is worth reviewing the environmental review procedures outlined in the Minnesota Environmental Policy Act (“MEPA”). Therefore, I have respectfully included background information (please see Sections I – III below), along with other practical benefits of ordering an EIS (please see Section VII below).</p> <p>In addition, detailed comments are provided that reference specific sections of the EA/EAW for this project. (Please see Section IV below.).</p>	Comment noted.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	44	Finally, PLEASE TAKE NOTICE that West Lakeland Township will be filing a Notice of Intervention as an intervening party in the proceeding, pursuant to the Minnesota Environmental Rights Act (Minnesota Statute 116B.09).	Comment noted.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West	45	<p>I. THE PURPOSE OF ENVIRONMENTAL REVIEW</p> <p>The purposes of the Minnesota Environmental Policy Act (“MEPA”), Minnesota Statute Chapter 116D, are stated in Minn. Stat. 116D.01:</p>	Comment noted.

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Lakeland Township)		<p>“(a) to declare a state policy that will encourage the productive use and enjoyable harmony between human beings and their environment;  “(b) to promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of human beings; and  “(c) <b>to enrich the understanding of the ecological systems and natural resources important to the state and to the nation.</b>”  [Emphasis added.]</p> <p>The importance of environmental review is best described in paragraph (c) above.</p> <p>The Minnesota Environmental Quality Board (in Minn. Rule 4410.0300, Subp. 3) elaborates on the purposes of environmental review:</p> <p>“The Minnesota Environmental Policy Act recognizes that the restoration and maintenance of environmental quality is critically important to our welfare. The act also recognizes <b>that human activity has a profound and often adverse impact on the environment.</b>  <b>“A first step</b> in achieving a more harmonious relationship between human activity and the <b>environment is understanding the impact which a proposed project will have on the environment.</b> The purpose of ... [the EQB rules] ... is to aid in providing that understanding</p>	



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		<p>through the preparation and public review of environmental documents.” [Emphasis added.]</p> <p>Minn. Rule 4410.0300, Subp. 4, outlines the objectives of environmental review:</p> <p>“A. provide usable information to the project proposer, governmental decision makers and the public concerning the primary environmental effects of a proposed project;</p> <p>“B. provide the public with systematic access to decision makers, which will help to maintain public awareness of environmental concerns and encourage accountability on public and private decision making; ...”</p> <p>“MEPA’s procedures require government bodies to consider the significant environmental consequences of a project <b>‘to the fullest extent practicable.’</b> Minn. Stat. 116D.03, subd. 1.” Iron Rangers For Responsible Ridge Action v. Iron Range Resources, Inc.531 N.W.2d 874, 880 (Minn. App. 1995), review denied.</p>	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	46	<p>II. THE PURPOSES OF AN EAW AND AN EIS ARE CLEARLY DIFFERENT.</p> <p>A. PURPOSE OF AN EAW.</p> <p>Minnesota Statute 116D.04, Subd. 1a (3), defines an Environmental Worksheet as “... a <b>brief document</b> which is designed to set out the basic facts necessary to determine whether an environmental impact statement is required for a proposed action.” (Emphasis added.) See also</p>	<p>Comment noted. MEPA and the Minnesota Environmental Quality Board (“EQB”) rules implementing the statute provide for preparation of an EAW when, “because of the nature or location of a proposed project, the project may have the potential for significant environmental effects.” Minn. R. 4410.1000, subp. 3. An EIS is necessary under MEPA when a project “has the potential for significant environmental effects” based upon the four criteria</p>

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		<p>Bolander v. City of Minneapolis 502 N.W. 2d 203, 206 (Minn. 1993); and Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995).</p> <p>“Whereas the <b>EAW is not intended to be a detailed analysis</b> of potential environmental impacts of a proposed project, the EIS is a much more detailed study of all factors contributing to a significant impact on the environment.” (Emphasis added.) Iron Rangers For Responsible Ridge Action v. Iron Range Resources, Inc. 531 N.W.2d 874, 880 (Minn. App. 1995), review denied.</p> <p>Minnesota Rule 4410.1000, Subpart 1, states, “The EAW is a <b>brief document</b> prepared in worksheet format which is designed to rapidly assess the environmental effect which may be associated with a proposed project. The EAW serves primarily to:</p> <ul style="list-style-type: none"> <li>A. aid in the determination of whether an EIS is needed for the proposed project; and</li> <li>B. serve as a basis to being the scoping process for an EIS.” (Emphasis added.)</li> </ul>	<p>set forth in the EQB rules. Minn. R. 4410.1000, subp. 7. The purpose of an EIS under MEPA is to provide information to governmental units, the project proposer, and other persons to evaluate proposed projects that have the potential for significant environmental effects, to consider alternatives to the proposed projects, and to explore methods for reducing adverse environmental effects. Minn. R. 4410.2000, subp. 1.</p> <p>Although MEPA and the EQB rules define an EAW as a “brief document,” an EAW for a complex project that also requires an EA under NEPA is rarely brief. The length is necessary in part because of the complexity of the Lake Elmo Airport runway project. In addition, NEPA requires an EA to evaluate alternatives, but MEPA does not require an alternatives evaluation in an EAW. The EQB rules expressly provide for the joint preparation of federal and state environmental review documents under NEPA and MEPA, such as the preparation of an EA/EAW. Minn. R. 4410.3900.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West	47	<p>B. PURPOSE OF AN EIS. (THE RGU CANNOT ABANDON ITS DUTY TO ORDER AN EIS BY DEFERING ISSUES TO PERMIT PROCESSES.)</p> <p>“The purpose of an EIS is to provide information to evaluate proposed actions that have</p>	<p>Comment noted. The purpose of environmental review under MEPA, whether the environmental review document is an EAW or an EIS, is to provide information regarding a proposed action before a project is commenced and before any final governmental decision is made to grant a permit, approve a project, or begin a project. Minn. R.</p>

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Lakeland Township)		<p>the potential for significant environmental effects, to consider alternatives to the proposed actions, and to explore methods for reducing adverse environmental effects. Minn. Rule 4410.2000, Subp. 1.” MCEA v. MPCA 644 N.W.2d 457, 462 (Minn. 2002).</p> <p>“The very purpose of an EIS ... is to determine the potential for significant environmental effects <b>before they occur. By deferring this issue to later permitting and monitoring decisions, the [RGU] abandoned [its] duty</b> to require an EIS where there exists a potential for significant environmental effects.” (Emphasis added.) See Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995). See also Pope County Mothers v. MPCA 594 N.W.2d 233, 237-238 (Minn. App. 1999).</p>	4410.3100. Here, the EA/EAW has been prepared before the proposed project has been commenced. The document evaluates whether the proposed project may have the potential for significant environmental effects and concludes that it does not.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	48	<p>C. AN EAW CANNOT SUBSTITUTE FOR AN EIS</p> <p>Even though some governmental units have treated an EAW in practice as a substitute EIS, that is not the legal function of an EAW. “From my discussions with various administrators working on environmental review, the consensus seems to be that the content of EAWs tends to be more intensive than perhaps the statute intended.” [Bettison, Stacy L., “The Silencing of the Minnesota Environmental Policy Act: The Minnesota Court of Appeals and the Need for Meaningful Judicial Review.” 26 William Mitchell Law Review, 967, 976 (2000).]</p>	The EA/EAW for the proposed project is not attempting to substitute for an EIS. Rather, the EA/EAW evaluates whether an EIS is needed. The EA/EAW establishes the proposed Lake Elmo Airport runway project does not have the potential for significant environmental impact and an EIS is not needed. See Responses to Comment IDs 41-42 and 46-47 above.

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		<p>As the Court of Appeals has stated, “The record in this case exemplifies the need for careful evaluation and differentiation between the purpose served by an EAW and that served by an EIS.” See Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995).</p> <p>In other words, an <b>EA/EAW, even with appendices, is not a substitute for an EIS.</b></p>	
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>49</p>	<p>III. THE PURPOSE AND CONTENT OF PUBLIC COMMENTS TO THE EAW. Minnesota Rule 4410.1600 states in part, “The comments <u>shall</u> address the accuracy and completeness of the material contained in the EAW, potential impacts that may warrant further investigation, and the need for an EIS ...” [Emphasis added.]</p> <p>As described below, the Lake Elmo Airport Expansion EA/EAW is inaccurate and incomplete. In that event, Minn. Rule 4410.1700, Subpart 2a, states that if information is lacking, but could be reasonably obtained, the RGU <u>shall</u> either: (1) make a positive declaration for an EIS and include the lacking information as part of the EIS scope; or (2) postpone the decision on the need for an EIS up to 30 days to obtain the lacking information.</p>	<p>As set forth in the EA/EAW and these responses to comments, the information in the EA/EAW is accurate and complete. The rule cited in the comment addresses circumstances where the responsible governmental unit (RGU) determines information necessary to a reasoned decision on environmental impacts is lacking but could be reasonably obtained, and provides a process for an extension to obtain such information. MAC as the RGU for the proposed project has made no determination regarding an extension to obtain information. All information for a reasoned decision regarding the need for an EIS for the Lake Elmo Airport runway project under NEPA and MEPA is presented in the EA/EAW, these responses to comments, and the administrative record for the EA/EAW. See also Responses to Comment IDs 41-42 and 46-48 above.</p>

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		<p>For the reasons stated below, the “lacking” information must be part of the EIS scoping document.</p> <p>However, <u>even if</u> the EA/EAW is inaccurate or incomplete in its present form, the <u>presently known</u> facts in this case satisfy the criteria for an EIS. The itemized comments in Section IV below describe what information is “lacking” and explain why an EIS must be ordered.</p>	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	50	<p>IV. ITEMIZED COMMENTS TO EA/EAW</p> <p>The following comments will show that the Draft EA/EAW is <b>both inaccurate and incomplete</b>. Furthermore, as previously stated, the nature scope of the project has <b>the “potential for significant environmental effects” and, consequently, requires an Environmental Impact Statement (EIS)</b>.</p>	The information in the EA/EAW is accurate and complete, and establishes there is no need for an EIS. See Responses to Comment IDs 41-42 and 46-49 above.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	51	<p>Please note: The numbering of the West Lakeland Township’s comments corresponds to the pages and paragraphs in the Draft EA/EAW and its Appendices.</p> <p>CAVEAT: The absence or omission of my client’s comment on any statement in the Draft EAW/EA shall <b>not</b> be deemed an agreement with, or admission of, the draft EAW/EA statement.</p>	<p>Comment noted.</p> <p>The MAC notes that West Lakeland Township’s opportunity to comment on the EA/EAW is limited to the public comment period. West Lakeland Township may not reserve any comments or arguments not offered during the public comment period. The MAC also disagrees with West Lakeland Township’s characterization of the EA/EAW as inaccurate or incomplete.</p>
Mr. Thomas E. Casey, Attorney	52	<b>Page 2-2, paragraph 1:</b>	The Airport Pavement Management Program for the MAC reliever airports includes periodic pavement

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<p>at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>		<p>The EA/EAW contends that the pavement condition index (PCI) for the runways is 41-60, either “poor” or, marginally, “fair.” However, the main runway (14/32) was resurfaced two years ago and Airnav rates both Lake Elmo runways as in “good condition” – which is a PCI of rating of 86-100. [See <a href="http://www.airnav.com/airport/21D">http://www.airnav.com/airport/21D</a> last visited 3/30/18).]</p> <p>The EA/EAW is inconsistent with the Airnav rating and must be reconciled.</p>	<p>condition inspections, most recently in 2016 for Lake Elmo Airport. The inspections are completed in accordance with FAA guidelines and utilize the Pavement Condition Index (PCI) Method. The 2016 pavement condition study assigned average PCI ratings between 41 and 60 for both runways, as shown in EA/EAW Figure 2.1. The Airnav.com runway surface condition description comes from the FAA Form 5010-1, Airport Master Record, which is updated by MAC on a periodic basis to reflect the results of the most recent pavement condition inspection. The Form 5010-1, Airport Master Record has been updated by MAC to reflect a “fair” pavement condition for both runways, which will subsequently be reflected on Airnav.com.</p> <p>The statement that the main runway (14/32) was resurfaced two years ago is incorrect. In 2012, a mill and overlay was completed, including joint crack repair, for the center 40-foot pavement section of Runway 14/32. This project was completed as a short-term repair to keep pavement near the end of its useful life in a serviceable condition at minimal cost. Even after the 2012 repair, issues remain with uneven pavement conditions during freeze and thaw cycles, causing the Airport to issue notices to airmen (NOTAMs) in 2016 and 2017 cautioning pilots that the runway has uneven pavement joints in the asphalt due to frost heaves. The pavement will eventually fail and needs to be rebuilt.</p>



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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	53	<p><b>Page 2-2, paragraph 1:</b>  The EA/EAW states, “As such, in this case the proposed action should include replacing the pavement for <b>both</b> runways, as well as their associated parallel and connector taxiways, to facilitate continued use of the runways throughout a 20-year design life.” This statement includes more work than contained in the \$15,325,000 “Preferred Alternative Cost Estimates” contained in Table ES-2 of the Lake Elmo Airport 2035 Long Term Comprehensive Plan (LTCP). This inconsistency must be reconciled.</p>	<p>Table ES-2 includes cost estimates for constructing the new Runway 14/32, converting the existing Runway 14/32 to a parallel taxiway, and reconstructing existing Runway 04/22. Most of the existing parallel and connector taxiway system is not in need of immediate reconstruction and therefore was not included in the LTCP cost estimates. However, reconstruction of the taxiway system is included in the proposed action because, given the system’s age, reconstruction will be needed sometime in the foreseeable future. Taxiway reconstruction will be considered by the MAC based on the results of periodic pavement inspections and available capital improvement funding.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	54	<p><b>Page 2-4, paragraph 1:</b>  The EA/EAW states, “Lake Elmo Airport is bordered by the Union Pacific Railroad to the north, County State Aid Highway (CSAH) 15 (Manning Avenue North) to the west, and 30th Street North to the south, all of which enter the Runway 14/32 RPZs as shown on Figure 2.2.” The FAA document entitled, “FAA Airport Division – Runway Protection Zones 550,” states on page 2, last paragraph, “<b>FAA Recommendation</b> ... Airports that do not own the entire RPZ should consider the need to acquire such land if there is <b>any possibility</b> that incompatible land uses <b>could</b> occur within the RPZ.” [Emphasis added.] The EA/EAW should explain why MAC did not purchase property on the west side of Manning Avenue to alleviate the incompatibility. The EA/EAW is incomplete without including an</p>	<p>The MAC did not purchase land in the RPZ on the west side of Manning Avenue because other alternatives exist that can remove incompatible land uses (i.e. the railroad, CSAH 15, and 30<sup>th</sup> Street North) from the RPZ without purchasing additional land. Acquisition of this property was not considered as an alternative by the EA/EAW because it does not avoid or minimize land acquisition, which is one of the three basic criteria that MAC used to limit the range of alternatives (see introduction to Section 3.2 on Page 3-2). Purchasing property on the west side of Manning Avenue does not meet the Purpose &amp; Need of the proposed project because it does not 1) minimize incompatible land uses in the RPZs, or 2) meet runway length needs for aircraft users. Therefore, the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as incomplete.</p>

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		analysis of the cost and environmental impacts of this acquisition.	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	55	<p><b>Page 2-4, last paragraph:</b>  The EA/EAW states, “The operational fleet at Lake Elmo Airport consists of propeller-driven aircraft that weigh less than 12,500 pounds and have fewer than 10 passenger seats. FAA AC 150/5325-4B states that the length of primary runways intended for aircraft weighing less than 12,500 pounds should be designed based on a family grouping of small airplanes. The critical aircraft for determining runway length is “the listing of airplanes (or a single airplane) that results in the longest recommended runway length.”  MAC is inaccurate because the planes that MAC is referencing (turbo prop and multi-piston aircraft) are at the top end of this category (listed on page 2-6, Table 2.2). None of these planes are at the Lake Elmo Airport today.</p>	<p>Mead &amp; Hunt analyzed the prevalence of specific aircraft makes and models at the Airport to derive aircraft-specific fleet mix estimates for the design family of aircraft for the runway length analysis contained in Appendix A. To make these estimates, a detailed analysis was conducted using data available from both the FAA Traffic Flow Management System Counts (TFMSC, <a href="https://aspm.faa.gov/tfms/sys/main.asp">https://aspm.faa.gov/tfms/sys/main.asp</a>) and the MAC Noise and Operations Monitoring System (MACNOMS). Because the makes and models operating at a specific airport tend to vary from year to year, the 2016 MACNOMS information was compared to TFMSC information for the years 2012 to 2016, to verify the aircraft types have operated at the Airport on a consistent basis.</p> <p>This detailed fleet-mix evaluation confirmed the design aircraft family at the Airport to be the small, propeller-driven aircraft weighing less than 12,500 pounds with fewer than 10 passenger seats. It is important to note that the airplanes used to determine the proposed primary runway length may not be based (i.e. stored) at the Airport, but according to MACNOMS and TFMSC data, they have used the Airport on a transient basis (i.e. arrive from other airports at which they are based). All of the airplanes listed in Table 2.2 have similar operating characteristics, are within the family grouping of propeller-driven aircraft that weigh less than 12,500</p>

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			pounds and have fewer than 10 passenger seats, and together they represent “the listing of airplanes that results in the longest recommended runway length,” which are the critical aircraft for Lake Elmo Airport as defined by FAA Advisory Circular (AC) 150/5325-4B.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	56	<b>Page 2-7:</b> Chart 2.1 shows the “Average Required Lengths” for aircraft listed on page 2-6, Table 2.2. By averaging, it makes the distances look better. Referencing the Lake Elmo Airport 2035 Long Term Comprehensive Plan (LTCP), the Accelerate/Stop (A/S) distance for the Pilatus PC-12 is 3,677 feet. Again, referencing the Lake Elmo Airport 2035 LTCP, the A/S distance for the Cessna 421 is 4,210 feet. For a Cessna 414m the A/S distance is 4,900 feet. Averaging makes it look better for 3,500 feet but, when you look at individual aircraft, the numbers don’t add up for these aircraft.	The average values for all three operational distance categories associated with the list of critical design airplanes (takeoff distance, accelerate-stop distance, and landing distance) differ by less than 125 feet from the median values for all scenarios considered. Median values have been added to Appendix A, Tables 20 through 22, for comparison with the averages. The similarity of the average and median values indicates that the required runway length is not skewed either upward or downward by averaging.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	57	<b>Page 2-8:</b> Table 2-3 references critical aircraft using the cross wind runway. According to EA/EAW (page 2-7), the crosswind runway is planned to be extended to 2,750 feet. However, the first five aircraft listed on table 2-3 have “takeoff distance requirements” that exceed 2,750 feet. The EA/EAW is inadequate by not explaining why the cross wind runway should not be extended now to accommodate all of the aircraft listed in table 2-3. [Note: The 2008 Lake Elmo Airport	As stated in Appendix A, Page A-24, a 2,750-foot crosswind runway length was selected because it “would accommodate the average takeoff requirements of the smaller and lighter airplanes operating at Lake Elmo Airport on a regular basis.” These lower crosswind capable airplanes within the design aircraft family collectively conduct over 500 annual operations on the crosswind runway at Lake Elmo Airport, which exceeds the regular use threshold as defined by FAA AC 150/5325-4B and AC 150/5000-17. The group of aircraft shown in Table 2-3 represents the aircraft that conduct the majority of

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		Long Term Comprehensive Plan considered 3,200 feet. Why not now?]	<p>operations on the crosswind runway. The method used to establish the recommended crosswind runway length in Chapter 2 and Appendix A is based on balanced consideration of the needs of the design aircraft family and is not based on the needs of an individual aircraft. This is appropriate based on the diversity of aircraft types and users at the airport, and is consistent with AC 150/5325-4B, Section 206, where FAA selectively groups performance information from individual airplane flight manuals to establish recommended runway length. The EA/EAW adequately explains selection of the crosswind runway length.</p> <p>The alternative that considers a 3,200-foot length for Runway 04/22 is considered in EA/EAW Chapter 3, Section 3.2.3, as Primary Runway Alternative A. As stated in this EA/EAW section, “this alternative was eliminated from further consideration because it 1) does not meet the runway length needs of Airport users, 2) does not address existing incompatible land uses in both Runway 14/32 RPZs, and 3) does not provide optimal wind coverage on the longer (primary) runway.”</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	58	<b>Page 3-2:</b> Paragraph 3.2 states: “ <b>1) Avoid or Minimize Changes to Airport Use and Aircraft Flight Patterns.</b> Alternatives that would substantially change airport use or aircraft flight patterns are not considered reasonable or feasible by this EA/EAW.” In fact, MAC is targeting larger Critical Aircraft (in the 10 passenger and under category),	The EA/EAW considers potential changes in aircraft fleet mix associated with the proposed action, and therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as incomplete. The aircraft operations forecast described in EA/EAW Appendix A, Section 1.4, anticipates minor increases in the share of multi-engine piston, turboprop, and jet aircraft operations because of the

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		<p>that are not at the airport today. If the larger planes are allowed to come, which will occur if the project is approved, this will “substantially change the airport use.” The EA/EAW is incomplete without addressing this problem.</p>	<p>additional available runway length. These forecasted increases equate to approximately 3 additional multi-engine piston, 4 additional turboprop, and 0.5 additional jet aircraft operations per week when compared to the 2016 base year condition. Even with these minor increases, the forecast critical design aircraft for the Airport will continue to be represented by the family of small, propeller-driven aircraft weighing less than 12,500 pounds and with fewer than 10 passenger seats. This family of aircraft has similar operating characteristics, but includes a diverse range of equipment types, ranging from small single-engine piston aircraft up to larger single- and twin-engine turboprop aircraft.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>59</p>	<p><b>Page 3-2:</b>  Paragraph 3.2 also states: “<b>3) Avoid or Minimize Land Acquisition.</b> Because alternatives exist that would meet the purpose and need without requiring land acquisition, alternatives that would require land acquisition are not considered reasonable or feasible by this EA/EAW.”  West Lakeland Township’s research found that it would cost between \$95,000 and \$125,000 to purchase a 0.2-acre lot along Manning Avenue for a buildable city lot. The City of Lake Elmo owns the entire drainage area (~13.2 acres) south of the railroad tracks along Manning Ave, which includes the current runway protection zone (RPZ) area. West Lakeland Township estimates that the RPZ area south of the railroad tracks and west of Manning Avenue is approximately 6.3 acres. West Lakeland Township contends that the drainage</p>	<p>Purchasing property on the west side of Manning Avenue was not considered as an alternative by the EA/EAW because it does not avoid or minimize land acquisition, which is one of the three basic criteria that MAC used to limit the range of alternatives (see introduction to EA/EAW Section 3.2 on Page 3-2). Furthermore, purchasing property on the west side of Manning Avenue does not meet the Purpose &amp; Need of the proposed project because it does not 1) minimize incompatible land uses in the RPZs, or 2) meet runway length needs for aircraft users. See response to Comment ID 54, above.</p>

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		<p>pond area (an unbuildable area) would cost considerably less to purchase than a buildable city lot and a tremendous amount less than building a new runway to meet the FAA’s Runway Protection Zones 550 Memo, which states; <b>“Airports that do not own the entire RPZ should consider the need to acquire such land if there is any possibility that incompatible land uses could occur within the RPZ”</b>. [Emphasis added.]</p>	
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>60</p>	<p><b>Page 3-2:</b>  Paragraph 3.2.1 states: “1) does not meet the runway length needs of Airport users ...”  The EA/EAW is incomplete because it does not contain information to support this assertion. In fact the runway length does meets the needs of the users based there today.</p>	<p>Runway length needs for the Airport’s critical aircraft are analyzed in detail in Appendix A, Section 2, and therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as incomplete.</p> <p>It is important to note that the airplanes used to determine the proposed primary runway length may not be based (i.e. stored) at the Airport, but according to MACNOMS and TFMSC data, they have used the Airport on a transient basis (i.e. arrive from other airports at which they are based).</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>61</p>	<p><b>Page 3-3, last paragraph:</b>  The EA/EAW states, that the Lake Elmo Airport “... is not the only reliever airport in Washington County ...” The EA/EAW is inaccurate by not considering the airports in Forest Lake (Washington County), South St. Paul, and New Richmond, Wisconsin, airports that serve the east metro region.</p>	<p>The statement on Page 3-3 that Lake Elmo Airport “is the only reliever airport in Washington County” is made in the context of a discussion of the metropolitan airport system owned and maintained by the MAC. The airports referenced in this comment, along with those listed on Pages 3-3 and 3-4, are considered among the alternate existing airports analyzed in EA/EAW Section 3.2.2 and shown in Figure 3-1, and therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as inaccurate.</p>



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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	62	<p><b>Page 3-4:</b> Table 3-1 pertains to alleged “drive distance and times from Lake Elmo Airport to other airports. Please see the letter from Mr. Stuart Grubb, PG, attached as <b>Exhibit 1</b>, where drive time issues are explained on the last page.</p>	See response to Stuart Grubb letter, comment ID 167.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	63	<p><b>Page 3-4, last paragraph:</b> The EA/EAW states, “ ... use of alternate existing airports in lieu of improving Lake Elmo Airport ... would not ... 2) enhance safety for Airport users and neighbors ...” The EA/EAW is incomplete and must explain how it is safe for neighbors, where larger aircraft will be able to use an expanded Lake Elmo Airport.</p>	<p>See response to Comment ID 58 above regarding anticipated increases in Airport use by multi-engine piston, turboprop, and jet aircraft.</p> <p>The Draft EA/EAW is complete in its evaluation because the proposed action will result in a primary runway that is more centrally located on Airport property and will therefore allow for more protected area beyond each end of the runway, thus providing a higher margin of safety for Airport users and neighbors, compared to the existing condition in which Manning Avenue North and 30<sup>th</sup> Street North are within the RPZs. Use of alternate existing airports would not enhance safety at Lake Elmo Airport, and therefore would not meet the Purpose &amp; Need.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	64	<p><b>Page 3-8, paragraph 1:</b> The EA/EAW states: “This alternative also designates Runway 14/32 as a ‘utility’ runway for aircraft less than 12,500 pounds, which reduces the size of the RPZs.” In fact, the RPZ at Lake Elmo is currently designated as a “utility” runway. The EA/EAW makes it appear that MAC is reducing the RPZ</p>	Both runways at Lake Elmo Airport are designated as “utility” by the current FAA Form 5010-1, Airport Master Record. This is consistent with the No-Action Alternative shown in Figure 3-8 of the Draft EA/EAW, which represents no change from the current designation and therefore depicts “utility” RPZs for all four runway ends. However, previous planning documents for the Airport have sought to protect larger “other than utility” RPZs for the primary runway

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		size, which they are not. This false impression must be rectified.	(Runway 14/32) in the future, as depicted under Alternative B as shown in Figure 3-9. Therefore, the MAC's decision to retain the "utility" designation for the primary runway represents a conscious departure from previous planning, including the original draft version of the most recent LTCP. This decision was made in response to community input, as retaining the "utility" designation not only allows for a 30 <sup>th</sup> Street North realignment alternative that maintains a four-way intersection with Neal Avenue North (an important consideration based on stakeholder input) but also supports the MAC's intention that the role of Lake Elmo Airport and the family of aircraft it serves should not change.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	65	<b>Page 3-9, Figure 3.3:</b> Item #14 on figure 3.3 references a new "on-Airport access road." Although this map doesn't show it, the north entrance on to Manning Avenue is being closed. All vehicles then must pass in front of the row 13 hangers or on "Alpha" Street. This can't be safe and it must be assumed that the hanger owner wouldn't approve of this plan. While row 13 or Alpha Street is not referenced in Fig 3-3 it, it is referenced in a document entitled "Manning Avenue (CSAH 15) Corridor Management and Safety Improvement Project" (SRF No. 8141.00).	Appendix A, Figure 3A, of the Manning Avenue (CSAH 15) Corridor Management and Safety Improvement Project EAW dated October 2016 depicts the north entrance from Manning Avenue to the Airport remaining open following construction of the four-lane divided highway. There are no plans to close the north entrance to the Airport.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf	66	<b>Page 3-14:</b> Figure 3-5 does not agree with contours in the Lake Elmo Airport 2035 Long Term Comprehensive Plan (page xvii, Figure ES-6). The EA/EAW is inadequate and incomplete when	The evaluation of aircraft noise in the Draft EA/EAW completely and adequately addresses the existing, forecast and no action alternatives' noise exposures in accordance with FAA Order 1050.1F, Environmental Impacts: Policies and Procedures and

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of West Lakeland Township)		<p>it fails to explain the difference and why Figure 3-5 does not contain the 55 DNL contour, as depicted in the ES-6 figure.</p> <p>Note also: The same ES-6 figure is referenced in Figures 5-2 and 5-5 in the Lake Elmo Airport 2008 Long Term Comprehensive Plan.</p>	<p>Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions. The noise modeling inputs and narrative are provided in Appendix J.</p> <p>The Federal Aviation Administration (FAA) requires use of the Day-Night Average Sound Level (DNL) noise metric to determine and analyze aircraft noise exposure and land use compatibility issues around U.S. airports. According to the FAA, the threshold of significance for noise is triggered if the Preferred Alternative reflecting the proposed airfield improvements would cause an increase of 1.5 dB DNL or greater for a noise sensitive (such as residential) land use at or above the 65 DNL noise exposure when compared to the No Action Alternative. There are no areas of sensitive land uses within the Preferred Alternative 65 DNL noise contour, as the 65 DNL noise contour for the Preferred Alternative is contained on Airport property. As a result, there are no significant aircraft noise impacts under the Preferred Alternative. Noise contours were developed for the 60 DNL as part of the EA/EAW for informational purposes only, as FAA does not consider the 60 DNL when determining the threshold of significance. The 55 DNL contour was included in the Lake Elmo Airport 2035 LTCP in accordance with Metropolitan Council guidance for comprehensive plans.</p> <p>The DNL noise contours shown in the 2035 LTCP were developed using the FAA Integrated Noise</p>

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			<p>Model (INM) computer software. As discussed in Appendix J, the FAA replaced INM with the Aviation Environmental Design Tool (AEDT). As such, the FAA requires that AEDT be used for any federal National Environmental Policy Act environmental reviews initiated after May 2015. According to the FAA, there is an overlap in functionality and underlying methodologies between AEDT and INM, however updates were made in AEDT that result in minor differences when comparing outputs from AEDT and INM.</p> <p>Additionally, the base year and forecast scenario noise contours used different inputs in the LTCP than the EA/EAW. This is because the LTCP was conducted in 2015 and is a high-level planning document. The LTCP noise modeling used 2012 as the base year with a 20-year forecast for 2035. The noise modeling completed as part of the EA/EAW used a more recent base year of 2016 and a forecast of 2025 to evaluate approximately five years following the runway opening. The base year and forecast aircraft types and operations for the EA/EAW aircraft noise modeling were based on the operations estimates presented in Appendix A, and the detailed AEDT data inputs are included in Appendix J.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West	67	<p><b>Page 3-17:</b> Paragraph 1 states, "... the design speed for the relocated roadway would be reduced from 45 to 30 miles per hour" This is not correct; it should be 55 miles per hour instead of 45.</p>	<p>The first paragraph on Page 3-17 of the Draft EA/EAW describes the 30<sup>th</sup> Street North Alternative 3. The speed reduction was intended to be a comparison with the Alternatives 1 and 2 for 30<sup>th</sup> Street North. To clarify this intent, the document has been updated to read:</p>

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Lakeland Township)		<p>Paragraph 1 also states, “This alternative does not introduce any new intersections or <b>turning movements</b> for through traffic on 30th Street.” [Emphasis added.] The EA/EAW is incomplete by failing to explain why two new curves on 30th Street are not “turning movements.”</p> <p>It should also be noted that Washington County’s proposed 2040 Comprehensive Plan has changed 30th Street to a “major collector” road. The EA/EAW is inadequate by not addressing this change.</p>	<p>“Because of tighter curves, the design speed for the relocated roadway would be reduced from the design speed of 45 miles per hour under Alternatives 1 and 2, to a design speed of 30 miles per hour. The existing design speed for 30<sup>th</sup> Street is 55 miles per hour.”</p> <p>In the MnDOT Road Design Manual, the phrase “turning movements” is used in the context of design for intersections, roundabouts, and turn lanes. In each case, turning movements consist of turns from one street to another, or from a street to a driveway or vice versa, that require that a vehicle either come to a complete stop or significantly reduce its speed. For comparing alternatives in the Draft EA/EAW, the horizontal curves in the proposed realignment of 30<sup>th</sup> Street North do not fit this description and therefore are not identified as turning movements.</p> <p>Both the 2030 Washington County Comprehensive Plan and the Draft 2040 Washington County Comprehensive Plan classify 30<sup>th</sup> Street North as a major collector road. This is also consistent with the Functional Classification System prepared by the Metropolitan Council. The Draft EA/EAW accurately identifies this road as a major collector road throughout the document. On Page 5-13, the Draft EA/EAW states: “The 30th Street North roadway east of Manning Avenue North is classified as a major collector based on the Functional Classification System prepared by the Metropolitan Council in</p>

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			September 2014. This classification was used to determine appropriate dimensions, curvature, speed limits, and design for the realigned roadway.”
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	68	<b>Page 3-18, Figure 3-7:</b> In the “Alternative B2” drawing, and also in the “Appendix B – 30th Street Realignment Alternative Review”, both drawings indicate that the realigned section of 30th Street is in the MnDOT Clear Zones. These clear zones are 500 feet by 1,000 feet by 800 feet. The EA/EAW is incomplete by failing to describe how this conflict will be addressed.	The proposed realigned section of 30 <sup>th</sup> Street does not conflict with MnDOT clear zone policy, and therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as incomplete. The MnDOT Office of Aeronautics clear zone policy does not identify specific land uses that it considers incompatible with the clear zone, and therefore the realigned section of 30 <sup>th</sup> Street is not incompatible with the clear zone. The MnDOT clear zone policy requires that adequate property interests be acquired to control the clear zone to the extent practicable.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	69	<b>Page 3-21:</b> The EA/EAW states under “Environmental Factors – Tree Removal” – “The no action alternative includes removal of any on-Airport trees that penetrate these surfaces for both runways.” The EA/EAW is incomplete and inadequate for failing to explain why these trees have not been removed before now. It appears MAC has not been responsible until an EA/EAW was commenced. The EA/EAW states under “Land Use”: “Before completing the EA/EAW process, the MAC will start convening a Joint Airport Zoning Board (JAZB) under Minnesota Statutes Chapter 360”. The EA/EAW is inadequate and incomplete by failing to explain why a JAZB was not created	The trees that require removal and the areas that require zoning will change from the current condition after the proposed action is implemented. The MAC has not completed these efforts yet because postponing them avoided adverse effects to private property owners, trees, and other environmental resources that are not affected under the proposed development plan. The EA/EAW includes adequate information regarding tree removal for purposes of evaluating the no-action alternative and is therefore complete and adequate.  The purpose of an EA/EAW is to determine and evaluate certain effects of a proposed action. Evaluation of theoretical historic zoning is not applicable to the proposed action, and any previous



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		<p>before now, as required in 1997 and 2008 Lake Elmo Airport Long Term Comprehensive Plans, when the problems were easier to rectify than today.</p> <p>The EA/EAW also states under “Land Use”: “This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state’s model zoning ordinance.” The EA/EAW is inadequate and incomplete for failing to analyze and explain how the likely deviations from the state model zoning ordinance may affect safety and the whether or not the likely deviations have the potential for significant environmental effects.</p>	<p>zoning by a JAZB would need to be revised to reflect the project that the EA/EAW evaluates.</p> <p>In addition, previous zoning would not have satisfied the purpose and need for the proposed action. For example, only one component of the purpose and need relates to incompatible land uses within the runway protections zones for Runway 14/32, and none of the three identified incompatible land uses would have been rectified by previous zoning. The 1997 and 2008 LTCPs did not require creation of a JAZB.</p> <p>The EA/EAW analyzes the effects of the most-encompassing and strict zoning scenario, which is the MnDOT State Model Zoning Ordinance. As a participant on the JAZB, MAC will seek to develop an airport zoning ordinance that achieves a balance between a reasonable level of safety and compatible community development. In several instances, JAZBs for other MAC airports determined that a strict application of the land use controls prescribed by the MnDOT State Model Zoning Ordinance exceed what is necessary to provide a reasonable level of safety. Those JAZBs have recommended less intrusive proposed zoning.</p> <p>The EA/EAW includes available and adequate information regarding zoning for purposes of evaluating the proposed action and is therefore adequate and complete.</p>

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			Additional evaluation of any effects of future zoning is not possible because any future zoning is subject to the final project outcome and a public process allowing public input. Any future zoning is determined by the public entity participants on the JAZB and by MnDOT.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	70	<p><b>Page 3-22:</b>  The EA/EAW states, “<b>Install obstruction lighting.</b> Various existing on-Airport structures would penetrate the departure threshold siting surfaces for all three alternatives. Based on consultation with FAA, installing steady-burning red obstruction lights on top of these structures would mitigate these penetrations and is proposed for all on-Airport structures penetrating the departure threshold siting surfaces.”  The EA/EAW is inadequate because it fails to consider lighting impacts for off- airport property in Model Safety Zone A (proposed runway)”: Jim Aronson’s property at 2724 Neal Ave. N.; two lots south of Mr. Aronson (that are for sale); the two corner lots at 30th and Manning Ave. (also for sale); and half of 2933 Manning Ave. Also included in Model Safety Zone A are portions of 2654, 2665, 2675, 2733, 2795, and 2825 Neal Ave. and half of 2933 Manning Ave.  In addition, the EA/EAW fails to consider lighting impacts on the following property in “Model Safety Zone B”: all of 2595 Neal Ave. and 13260 26th Street; the majority of 2521 Neal Ave.; portions of 2401 and 2481 Neal Ave.; 13170 and 13178 26th</p>	<p>Light emissions impacts are analyzed in Section 5.13 of the Draft EA/EAW. This section includes a discussion of the characteristics of these lighting systems; their location relative to off-Airport land uses; and potential visual impact mitigation measures that the MAC will consider during project design.</p> <p>The specific properties identified by the comment were considered when evaluating the location of the lighting systems relative to light-sensitive off-Airport land uses. The location of specific properties within the model safety zones does not necessarily indicate that those properties will experience significant light emissions impacts. The dimensions of the zones do not have a direct relationship to light emissions impacts.</p> <p>Because of the characteristics of the lighting systems, their distance from light-sensitive receptors, and available measures to mitigate for potential impacts, light emissions associated with the proposed action have limited potential to create annoyance, to interfere with normal activities, or to affect the visual character of the area. Therefore light emissions impacts associated with the proposed action are not</p>

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		<p>Street Ct.; and portions of 2725, 2785, 2815 and 2875 Manning Ave. and half of 2933 Manning Ave. There are at least seven properties in Baytown and six in Lake Elmo that are in Zone B. Finally, in a MnDOT Aviation presentation on June 10, 2015, they referenced the year 1973 that “Airport zoning made a condition for receiving federal and state funding”. No airport zones are in effect at Lake Elmo today.</p>	<p>significant under criteria identified in FAA Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions, and the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as inadequate.</p> <p>There is an existing Washington County/Township Airport Overlay District in place providing a basic level of airspace and land use zoning protections for the existing airfield. As of January 1, 2017, Washington County no longer exercises land use authority in West Lakeland Township except for administration of ordinances affecting shoreland management, mining, floodplains, subsurface sewage treatment systems, and Lower St. Croix River bluffland and shoreland. West Lakeland Township has adopted the Washington County Development Code or a version similar to the document. Before completing the EA/EAW process, MAC will start a Joint Airport Zoning Board process, as described in the EA/EAW, Section 4.4.5, to update the zoning.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>71</p>	<p><b>Page 3-23:</b> The EA/EAW states: “<b>Logistical Factors.</b> Washington County plans to widen Manning Avenue North from two to four lanes within the next five years. This local project would trigger an FAA RPZ alternatives review because of the additional travel lanes and/or turn lanes are planned within the Runway 14 RPZ.” According a Washington County document, this area is planned for expansion in 5 years, but, in discussions with West Lakeland Township</p>	<p>The EA/EAW does not imply that an FAA RPZ review is a bad thing. The referenced statement in the EA/EAW occurs in the analysis of the no-action alternative, not the proposed project. The proposed project is consistent with Washington County’s proposal to widen Manning Ave North. The widening of Manning Ave North is reasonably foreseeable based on local capital improvement plans, regardless of when the expansion project actually occurs.</p>

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		<p>officials, it is more likely 5-8 years out. The EA/EAW inaccurately implies that a FAA RPZ review is a bad thing. This should be clarified. [Reference: <a href="https://www.co.washington.mn.us/DocumentCenter/View/15030">https://www.co.washington.mn.us/DocumentCenter/View/15030</a> (last visited 4/6/18).]</p>	
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	72	<p><b>Page 3-29:</b> Table 3-3 states under the “No-action Alternative” – “Future Manning Avenue widening will trigger FAA RPZ review.” Again, the EA/EAW inaccurately implies that a FAA RPZ review is a bad thing. The EA/EAW is incomplete without addressing this inaccuracy.</p>	<p>See response to Comment ID 71, above.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	73	<p><b>Page 4-5:</b> Table 4-1 lists 14,561 “military” operations, which are over one-half (55%) of the total operations. The EA/EAW is inadequate and incomplete by failing to state the methodology by which the military – and the “air taxi operations” (1,147 or 4%) – are recorded and verified. It is worthy to note that the remaining operations are (~41%) is local air traffic. Paragraph 1 states; “Runway design standards are based on a single aircraft or family of aircraft that regularly uses the runway and accounts for 500 annual operations not including touch-and-go operations.” The EA/EAW is inadequate and incomplete because it fails to state how many of the 11,900 remaining operations are touch and goes.</p>	<p>The number of itinerant military and itinerant general aviation aircraft operations shown in Table 4-1 were transposed in error. The table should read 169 itinerant military and 14,561 itinerant general aviation aircraft operations. This has been corrected in the Final EA/EAW.</p> <p>This correction does not change the environmental analysis, nor does it change the findings of the Draft EA/EAW.</p>

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		Finally, West Lakeland Township spoke with a Civil Air Patrol (CAP) person, who stated that they are not allowed to do “touch and goes” and that there is no way they have 14,000 operations at Lake Elmo.	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	74	<b>Page 4-13:</b> The EA/EAW state in paragraph 2: “This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state’s Model Zoning Ordinance.” The EA/EAW is inadequate and incomplete by failing to analyze the safety and environmental impacts of the likely deviations from the state’s Model Zoning Ordinance.	See response to comment ID 69, above.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	75	<b>Page 4-27:</b> Paragraph 4 states in part: “Current agricultural production (on airport property) includes corn and soybean on a rotational basis.” The EA/EAW fails to note that agriculture attracts geese and hunters. Eagles, turkey vulture, swans and sandhill cranes have also been seen on agricultural portion of property. [See photos attached as <b>Exhibit 2</b> (geese, located on the west side of Manning Ave.); <b>Exhibit 2A</b> (sandhill cranes, located south of 30th St.); and <b>Exhibit 2B</b> (trumpeter swans, located south of 30th St.)]	Chapter 5, Section 5.9.3, of the Draft EA/EAW states that wildlife attractants on Airport property include land currently leased for farming. This section also notes that numerous Canada geese were observed at the Airport by a Mead & Hunt wildlife biologist in October 2017. The wildlife biologist did not observe any eagles, turkey vultures, swans, or sandhill cranes on this visit. As noted in this comment, seasonal migratory bird species that have been observed on or near the Airport include Canada goose, sandhills cranes, turkey vultures, trumpeter swans, eagles and other seasonal migrants. Apart from the Canada goose, these species were not present during the October 2017 survey. Temporal variations in seasonal timing and weather are generally determinant for these observations.
Mr. Thomas E. Casey, Attorney	76	<b>Page 5-6:</b>	Current biotic communities on the Airport are described in EA/EAW Section 4.6. As noted in

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at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)		The last two paragraphs discuss tree removal. The EA/EAW is inadequate and incomplete by failing to analyze the impacts of the tree removal as habitat for species other than the northern long-eared bat.	EA/EAW Appendix I, the expansion of the airfield and associated hardscapes will reduce habitat for birds and wildlife at the Airport, and current resident wildlife that utilize the forested area will be displaced by the tree removal. However, any displaced wildlife will relocate to nearby forested areas. The analysis of wildlife habitats meets requirements for both a federal EA and state EAW, and adequately and completely considers these habitats.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	77	<b>Page 5-9:</b> The last paragraph references a “Farmland Conversion Impact Rating” and a point score. West Lakeland Township asserts that the Farmland Conversion Impact Rating is too low and so does the Department of Agriculture, when the township contacted them. The number of row crop acres to be removed is more than stated, plus there are acres to be converted from row crops to rusty patched bumblebee habitat flowers. (Reference: Appendix G, on the bottom map of pdf page 465.) The Green area cannot be the only area counted for removal of crop land. Farmers do not like to plant row crops in irregular shapes or around tight curves. Furthermore, based on Figure 4-8, West Lakeland Township calculates that areas that are currently mowed for hay production, that will be removed, is estimated to be approximately 50 plus acres. In sum, the EA/EAW is inaccurate and incomplete.	See response to Minnesota Department of Agriculture, Comment ID 1, above.
Mr. Thomas E. Casey, Attorney at Law, Letter	78	<b>Page 5-12:</b> Paragraph 5.9.1, subparagraph 1 states in part: “The preferred alternative would move the	This statement refers specifically to land use impacts associated with changes in the VFR traffic pattern at the Airport that will result from the proposed action.



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dated April 17, 2018 (on behalf of West Lakeland Township)		<p>Runway 14 threshold approximately 750 feet east-northeast and move the Runway 32 threshold approximately 1,200 feet east-southeast. Visual flight rules (VFR) traffic pattern airspace at the Airport would extend 1.5 nautical miles (9,114 feet) laterally and longitudinally from the runway endpoints under both the no-action and preferred alternatives. Because the preferred alternative would not substantially alter the VFR traffic pattern airspace, impacts to surrounding land uses are minimal.”</p> <p>In fact, this option moves the runway closer to and the safety zones over existing homes. The EA/EAW is inaccurate by describing this option as having “minimal” impact. The EA/EAW is incomplete by not describing the actual impacts to the “quality of life” of new and existing homes. (Reference: Lake Elmo Airport 2035 Long Term Comprehensive Plan, Tables 7-4, 7-5, and Figure 7-4.)</p>	<p>Changes to typical flight paths and aircraft altitudes in areas surrounding the Airport will be minimal, and therefore changes in quality of life associated with the relocated flight pattern will not be significant. As stated in the introduction to Section 3.2 of the EA/EAW, one of the basic criteria the MAC used to limit the alternatives considered by the Draft EA/EAW was to avoid or minimize changes to Airport use and aircraft flight patterns.</p> <p>The current MnDOT Model Safety Zones are used to compare alternatives in Chapter 3 of the EA/EAW (Section 3.3.5) and the specific number of houses within Model Safety Zones A and B under the preferred alternative is identified in Section 5.9.1. The combined number of houses within these zones is reduced under the preferred alternative as compared to Alternative B.</p> <p>There is no environmental category for “quality of life” under FAA NEPA implementing regulations or on the MEPA EAW form. However, some of the environmental categories analyzed in the EA/EAW have a bearing on quality of life for residents near the Airport, including air quality, land use, aircraft noise, and environmental justice. These categories are completely considered by the EA/EAW in accordance with NEPA and MEPA requirements.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17,	79	<p><b>Page 5-12:</b> Paragraph 5.9.1, subparagraph 2, states in part, “Before completing the EA/EAW process, the MAC will start convening a Joint Airport Zoning</p>	<p>See response to Comment ID 69, above.</p>

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2018 (on behalf of West Lakeland Township)		<p>Board.” A Joint Airport Zoning Board (JAZB) was never created as required in past Long Term Comprehensive Plans and as direct by the Metropolitan Council. The EA/EAW is inadequate and incomplete by not describing why. West Lake Township asserts that we would not have the problems today if a JAZB had been created before this time.</p> <p>Paragraph 5.9.1, subparagraph 2 also states, “This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state’s Model Zoning Ordinance.” This may the same as no ordinance or making what exists today fit. One again, West Lake Township asserts that the EA/EAW is inadequate and incomplete for failing to analyze and explain how the likely deviations from the state model zoning ordinance may affect safety and the whether or not the likely deviations have the potential for significant environmental effects.</p>	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	80	<p><b>Page 5-13:</b> Paragraph 1 describes traffic count, accomplished in the summer when school was out. The EA/EAW is inadequate and incomplete until a traffic count is accomplished when school is in session.</p>	<p>The July 2016 traffic count referenced on Page 5-13 of the EA/EAW was collected by Washington County and is consistent with the road classification and traffic forecasts identified by the County in the Manning Avenue corridor study and the 2040 Washington County Comprehensive Plan. The MnDOT “Total Volume Program &amp; Vehicle Classification Program Guidelines” provide the following guidance regarding appropriate seasonal considerations for traffic counts.</p> <p>1.) Length of Season: Traffic counts should be taken between April 1st and October 1st (October 31st</p>

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			<p>if no harvest conditions). Counts taken in October can often be affected by harvest and other First Pass: non-typical conditions, so it is best to complete the counts as early as possible.</p> <p>2.) School Zones: Please schedule counts at sites where school year traffic is higher than summer traffic during the school year (April-May or September-October). <u>Elementary and Middle schools may or may not fall under this category.</u> <u>Field staff is to use their best judgment...</u></p> <p>Based on the relative locations of schools and residences near the Airport and alternate available routes, Mead &amp; Hunt concluded that school traffic on 30<sup>th</sup> Street North is related primarily to elementary and middle schools. Based on the MnDOT guidelines above, Mead &amp; Hunt further concluded that school traffic would not materially increase traffic counts above those already collected by Washington County. Therefore the MAC disagrees with West Lakeland Township's characterization of the EA/EAW as inadequate and incomplete.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	81	<p><b>Page 5-14:</b>  Paragraph 1 states in part, "Canada geese are increasing in numbers because of suburban development near the Airport, which includes a new storm water retention pond and open space."  Based on FAA Advisory Circular No. 150/5200-33b, airports that have received federal grant-in-aid assistance must use the following standards. The EA/EAW is inadequate and incomplete</p>	<p>As stated in the USDA Wildlife Biologist's letter in Appendix I of the Draft EA/EAW, "the proposed changes to the existing airport layout are unlikely to increase the wildlife hazards present at 21D. The changes proposed would have little effect on current hazardous wildlife use of the airport and surrounding area." The proposed Runway 14 end will be located approximately 2,000 feet from the storm water retention pond west of Manning Avenue. This is an improvement from the existing Runway 14 end, which</p>

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		<p>without describing whether or not the proposed project complies with these standards:  <b>“1-2. AIRPORTS SERVING PISTON-POWERED AIRCRAFT.</b> Airports that do not sell Jet-A fuel normally serve piston-powered aircraft. Notwithstanding more stringent requirements for specific land uses, the FAA recommends a separation distance of 5,000 feet at these airports for any of the hazardous wildlife attractants mentioned in <b>Section 2</b> or for new airport development projects meant to accommodate aircraft movement. This distance is to be maintained between an airport’s AOA and the hazardous wildlife attractant ...” [Emphasis added.]  <b>SECTION 2. LAND-USE PRACTICES ON OR NEAR AIRPORTS THAT POTENTIALLY ATTRACT HAZARDOUS WILDLIFE.</b>  <b>2-1. GENERAL.</b> The wildlife species and the size of the populations attracted to the airport environment vary considerably, depending on several factors, including land-use practices on or near the airport. This section discusses land-use practices having the potential to attract hazardous wildlife and threaten aviation safety. In addition to the specific considerations outlined below, airport operators should refer to Wildlife Hazard Management at Airports, prepared by FAA and U.S. Department of Agriculture (USDA) staff. (This manual is available in English, Spanish, and French. It can be viewed and</p>	<p>is located approximately 900 feet from the pond. The 5,000-foot separation distance identified in FAA Advisory Circular (AC) 150/5200-33B is an FAA recommendation and not a requirement. There is not a feasible or practicable alternative that provides 5,000 feet of separation as recommended by the FAA while meeting the Purpose and Need. The MAC currently implements, and will continue to implement, other standards, practices, and recommendations contained in AC 150/5200-33B.</p> <p>The proposed action will move Runway 14/32 further away from the storm water retention pond located west of Manning Avenue, which will be a benefit from a wildlife hazard perspective. As a matter of practice, the MAC does not advocate the construction of open-water retention ponds in close proximity to its airports because of the potential to attract and/or sustain hazardous wildlife populations. Although it did not support construction of the open-water retention pond west of Manning Avenue, the MAC reviewed plans for Easton Village, consulted with the USDA-APHIS Wildlife Biologist under FAA Advisory Circular 150/5200-33B, and provided recommendations concerning the design of storm water retention and infiltration areas that would minimize wildlife hazards to the extent practicable. The developer updated the landscape plan in response to these comments. The MAC routinely reviews and comments on off-Airport development proposals near the Airport to assist with landscaping design that reduces wildlife attractants.</p>

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		<p>downloaded free of charge from the FAA’s wildlife hazard mitigation web site: <a href="http://wildlife-mitigation.tc.FAA.gov">http://wildlife-mitigation.tc.FAA.gov</a>). And, Prevention and Control of Wildlife Damage, compiled by the University of Nebraska Cooperative Extension Division. (This manual is available online in a periodically updated version at: <a href="http://ianrwww.unl.edu/wildlife/solutions/handbook/">ianrwww.unl.edu/wildlife/solutions/handbook/</a>.)”</p> <p>The paragraph below is transcribed from Section 2-3 – Water Management Facilities:</p> <p>“b. <b>New storm water management facilities.</b></p> <p>The FAA strongly recommends that off airport storm water management systems located within the separations identified in Sections 1-2 through 1-4 be designed and operated so as not to create aboveground standing water. Stormwater detention ponds should be designed, engineered, constructed, and maintained for a maximum 48–hour detention period after the design storm and remain completely dry between storms. To facilitate the control of hazardous wildlife, the FAA recommends the use of steep-sided, rip-rap lined, narrow, linearly-shaped water detention basins. When it is not possible to place these ponds away from an airport’s AOA, airport operators should use physical barriers, such as bird balls, wires grids, pillows, or netting, to prevent access of hazardous wildlife to open water and minimize aircraft-wildlife interactions. When physical barriers are used, airport operators must evaluate their use and ensure they will not adversely affect water rescue. Before installing any physical</p>	<p>However, the MAC cannot require off-site entities to limit wildlife attractants.</p> <p>Agricultural land-use practices are currently conducted on the Airport and will continue in the future. However, agricultural land-use practices will be reduced under the preferred alternative because of the expansion of the airfield pavements and associated protected areas.</p> <p>Stormwater detention ponds will be designed to drain completely within a 48-hour period, as required by FAA Advisory Circular 150/5200-33B.</p>

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		<p>barriers over detention ponds on Part 139 airports, airport operators must get approval from the appropriate FAA Regional Airports Division Office. All vegetation in or around detention basins that provide food or cover for hazardous wildlife should be eliminated. If soil conditions and other requirements allow, the FAA encourages the use of underground storm water infiltration systems, such as French drains or buried rock fields, because they are less attractive to wildlife.”</p>	
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>82</p>	<p><b>Page 5-16:</b>  The EA/EAW is inaccurate and incomplete by failing to explain why the noise contours keep changing from publication to publication. For example, Fig. 5-6 in the Lake Elmo Airport 2008 Long Term Comprehensive Plan and Figure ES-6 in the Lake Elmo Airport 2035 Long Term Comprehensive Plan, differs from the EA/EAW, Figure 5-2.  In referencing Figure 5-2 in Lake Elmo Airport 2008 Long Term Comprehensive Plan, West Lakeland Township asserts that they are within the “Small Town–Quiet Suburban” setting, which is in the 45-55 DNL range. Even if West Lakeland Township is considered a “Suburban Low Density” setting, they fall within the 52-60 DNL range, per fig. 5-2 in the Lake Elmo Airport 2008 Long Term Comprehensive Plan.  The EA/EAW is also inadequate and incomplete by failing to analyze how the removal of 25 acres of trees increases noise and light pollution.</p>	<p>See response to comment regarding aircraft noise analysis on Page 3-14, Comment ID 66 above.</p> <p>The Federal Aviation Administration (FAA) requires use of the Day-Night Average Sound Level (DNL) noise metric to determine and analyze aircraft noise exposure and land use compatibility issues around U.S. airports. According to the FAA, the threshold of significance for noise is triggered if the Preferred Alternative reflecting the proposed airfield improvements would cause an increase of 1.5 dB DNL or greater for a noise sensitive (such as residential) land use at or above the 65 DNL noise exposure when compared to the No Action Alternative. There are no areas of sensitive land uses within the Preferred Alternative 65 DNL noise contour as it is contained on Airport property. As a result, there are no significant aircraft noise impacts under the Preferred Alternative.</p> <p>The noise contours developed for the EA/EAW consider the effect of terrain for the no action and</p>



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			<p>preferred alternative scenarios, but do not account for trees. The contours are modeled for a treeless environment. Inclusion of trees in the model would not change the conclusion that there are no significant noise impacts, and therefore the noise analysis conducted for the EA/EAW is adequate and complete.</p> <p>The EA/EAW adequately and completely considers the relationship between tree removal and potential light emissions impacts in Section 5.13, in which the MAC acknowledges that tree removal associated with the project will eliminate an existing visual screen between the runways and residential areas southeast and northeast of the Airport. The MAC will carefully consider individual trees to only remove those that represent aeronautical hazards per FAA criteria. This section also identifies mitigation measures that will be considered further during project design.</p> <p>See response to comment regarding light emissions analysis on Page 3-22, Comment ID 70 above.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	83	<p><b>Page 5-17:</b> Paragraph 5.12 states in part, "... a land release from the Federal Aviation Administration (FAA) to allow realignment of 30th Street North near the new Runway 32 Runway Protection Zone (RPZ) to reconnect with the existing Neal Avenue North intersection." The EA/EAW is incomplete by failing to state why the FAA needs to release the land, whether or the release is legally required, and the</p>	<p>Any property, when described as part of an airport in an agreement with the United States or defined by an airport layout plan (ALP) or listed in the Exhibit 'A' property map, is considered to be 'dedicated' or obligated property for airport purposes by the terms of the agreement. At Lake Elmo Airport, this applies to all 640 acres of Airport property. In general, if the property is not needed for aeronautical purposes, a release is required. Realignment of 30<sup>th</sup> Street North may require an FAA-approved land release from</p>

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		<p>socio-economic and environmental impacts if they do not.</p> <p>The last paragraph states in part, “There are no low-income or minority populations near the project, and therefore no environmental justice impacts associated with either the no-action or preferred alternatives.” The EA/EAW is inaccurate and incomplete by failing to analyze the impacts of the quality of life for the residents of the area.</p>	<p>aeronautical use to allow construction of the proposed realigned segment of 30<sup>th</sup> Street. The comment that FAA will not grant a land release, if one is required, is speculative. The commenter does not present any information in the comment document supporting the possibility that FAA will not grant a required land release. FAA has granted land releases at other MAC airports.</p> <p>The referenced statement regarding low-income and minority populations is made with specific reference to FAA requirements for considering environmental justice considerations as part of a federal Environmental Assessment. Because there are no such populations affected by the proposed action, there are no environmental justice impacts.</p> <p>There is no environmental category for “quality of life” under FAA NEPA implementing regulations or on the state EAW form. However, some of the environmental categories analyzed in the EA have a bearing on quality of life for residents near the Airport, including air quality, land use, aircraft noise, and environmental justice. These categories are accurately and completely considered by the EA/EAW in accordance with NEPA and MEPA requirements.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West	84	<p><b>Page 5-23:</b> Paragraph 3 states in part, “As of November 27, 2017, the Minnesota Board of Water and Soil Resources (BWSR) website indicates there are sufficient available wetland bank credits to mitigate for wetland impacts associated with the</p>	<p>See response to Valley Branch Watershed District, Comment ID 15, above.</p>

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Lakeland Township)		<p>preferred alternative. The available wetland credit types correspond to the wetlands impacted by the preferred alternative and exceed the required mitigation for each wetland type. Purchase of wetland bank credits would occur after the exact wetland impact area is determined during design engineering, a process which may slightly change the estimated wetland impact and consequent wetland credit need.”</p> <p>The EA/EAW is inadequate by failing describe and analyze the sequencing requirements of the Wetland Conservation Act (Minn. Rule 8420.0520 et seq.)</p>	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	85	<p><b>Page 5-25:</b> Paragraph 5.14.2 states in part, “However, approximately 300,000 square feet of existing impervious surface will also be removed.” The EA/EAW is incomplete by failing to describe where this amount of impervious surface being removed and failing to provide the calculations supporting the assertion that 300,000 square feet of existing impervious surface will be removed.</p>	<p>The impervious surface to be removed by the proposed action is shown in both Figure 3-3 and Figure 3-10, and therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as incomplete. As shown in the figures, the impervious surface to be removed includes the edges of current Runway 14/32; the southernmost segment of Parallel Taxiway A; the current North Side Taxiway and compass calibration pad; and the portion of 30<sup>th</sup> Street that is proposed to be replaced by the realigned road segment. The total area of these pavements was quantified to arrive at the estimate of 300,000 square feet of existing impervious surface to be removed.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf	86	<p><b>Page 5-28:</b> Paragraph 5.14.3 references the FEMA floodplain. The realigned section of 30th Street is in 100-year flood plain. The FEMA floodplain map and the Valley Branch Watershed District 100-year</p>	<p>The FEMA floodplain map shown in Figure 4-9 is dated February 3, 2010. This map shows the floodplain south of 30<sup>th</sup> Street as Flood Hazard Zone A, an approximate Zone which indicates a 100-year flood elevation had not been determined. The VBWD</p>

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of West Lakeland Township)		floodplain maps differ. The EA/EAW is inaccurate and incomplete by failing to reconcile this difference and by failing to support the calculation that the total wetland fill footprint is only 0.06 acre.	<p>completed an analysis which determined a 100-year elevation and provided a new 100-year flood boundary which is consistent with and does not differ materially from the FEMA floodplain.</p> <p>For more information on evaluation of floodplain impacts, see response to VBWD, Comment ID 23, above.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	87	<p><b>Page 5-29:</b> Paragraph 5.14.4 (“Other Water Resources”) states in part, “The preferred alternative does not have potential impacts for water bodies listed as impaired.” In MAC’s “Assessment of Environmental Effects – Seven-Year Capital Improvement Program 2018-2025”, it states on page 13 they are constructing a salt storage shed at Lake Elmo. The EA/EAW is incomplete by failing to discuss the environmental impacts of this storage shed.</p>	<p>Construction of the referenced storage building is not part of the proposed action. As the AOEE for the 2018-2025 CIP explains, the storage building will be used for storing salt, sand, and topsoil to comply with Minnesota Pollution Control Agency requirements. The construction of the storage building does not meet the threshold in Minn. Stat. 473.614 for an EAW. Additionally, there are no cumulative impacts or cumulative potential effects resulting from the material storage building. Federal NEPA review is not required for this project because federal funds will not be used. For these reasons, the material storage building at Lake Elmo Airport planned in 2018 does not require additional environmental review.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	88	<p><b>Appendix A – Runway Length Needs Determination</b> <b>Page A-2:</b> The Metropolitan Airport Commission’s Noise and Operations Monitoring System (MACNOM) has 39 monitoring sites around the Minneapolis - St. Paul Airport. Site 9 is the closest site to Lake Elmo, which is approximately 15 nautical miles away. The EA/EAW is inaccurate and incomplete without explaining aircraft from Minneapolis-St. Paul,</p>	<p>The MAC owns and operates a Noise and Operations Monitoring System (MACNOMS). As explained in EA/EAW Appendix A, the flight tracking capability of MACNOMS is not solely dependent on data from the 39 noise monitoring sites, as it is also supported by several other data feeds. Therefore, MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as inaccurate and incomplete.</p>

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		<p>approximately 3.5 nautical miles away, and from St. Paul, approximately nautical miles away, would not overwhelm the small planes operating at Lake Elmo Airport. The EA/EAW is incomplete without describing the accuracy of the system. Paragraph 3, provides a tally of on-site observations at Lake Elmo Airport during a two-week period in December, 2011 and a one-week period in /august, 2012. The first bullet states: “Average daily aircraft operations were 52 in December 2011 and 87 in August 2012.” The EA/EAW is incomplete by not explaining whether or not this on-site observation includes touch-on-goes. The EA/EAW is inadequate because the count is 5 years old and is not an up-to-date on-site survey.</p> <p>Paragraph 4, third bullet, states that there were 56 turboprop operations, which require jet fuel. According to Airnav, the only fuel available at Lake Elmo Airport is 100LL; no jet fuel is available. By comparison, the New Richmond, Wisconsin airport - and the downtown St. Paul airport - have 100LL and Jet A fuel. The EA/EAW is incomplete by failing to address this discrepancy.</p> <p>St. Paul Pioneer Press, April 1, 2018 contains an article “St. Paul Airport Flight Ops in a Stall ...” in which the FAA is reported to have changed its method of counting “operations” and now exclude flyovers. The EA/EAW is incomplete without explaining this discrepancy.</p>	<p>In addition to monitoring noise levels at 39 remote noise monitoring towers located around Minneapolis-St. Paul International Airport (MSP), the system collects flight tracks through a multi-sensor surveillance data feed available for the U.S. National Airspace System. The data feed is a fusion of multiple data collection services, including data from a privately-owned network of Automatic Dependent Surveillance-Broadcast (ADS-B) sensors, FAA enroute and terminal secondary surveillance data, FAA Airport Surface Detection Equipment Model X (ASDE-X) data, FAA Wide Area Multilateration (WAM) data and FAA flight plan data. The MAC has an agreement with an external secure data-handler to provide the merged data feed for flights operating within a 40-mile area around MSP and extending to a height of 20,000 feet. In 2014, a MACNOMS validation study found that 97.1% of MSP flights observed through field observations matched with MACNOMS data outputs.</p> <p>Since there is no Air Traffic Control Tower (ATCT) at Lake Elmo Airport there is no “official” count of aircraft operations. Lake Elmo Airport is located approximately 18 miles from MSP; therefore, MACNOMS flight track data in the vicinity of Lake Elmo Airport were used in developing the AEDT inputs to generate the noise contours. AEDT uses input files consisting of information relative to runway use, flight track use, aircraft fleet mix, topography and atmospheric conditions to generate noise exposure contours. MACNOMS records geospatial flight track</p>

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			<p data-bbox="1209 235 1934 375">data, therefore differentiation between arrival, departure, and touch-and-go aircraft operations are possible as well as runway use, flight track use and other modeling inputs for AEDT.</p> <p data-bbox="1209 415 1969 776">The aircraft noise modeling in the Draft EA/EAW used calendar year 2016 aircraft operations for Lake Elmo Airport from MACNOMS data. Adjustments were made to the dataset, as described beginning on Page A-4 of Appendix A of the Draft EA/EAW. MACNOMS recorded 19,757 total flight tracks associated with takeoff, landing and touch-and-go operations at Lake Elmo Airport during 2016. This provided an adequate data sample for purposes of contributing to the construction of the AEDT inputs.</p> <p data-bbox="1209 816 1965 1031">Paragraph 3 on Page A-2 describes the methodology used in the 2012 base year aircraft operations estimate in the 2035 LTCP. These on-site counts include takeoffs, landings, and touch-and-go's. These counts were not used to support the 2016 operations estimates for the EA/EAW.</p> <p data-bbox="1209 1071 1965 1357">Jet fuel can be purchased at other airports that the aircraft operate at and therefore the lack of jet fuel for purchase at Lake Elmo Airport does not mean these aircraft do not use Lake Elmo Airport. It is important to note that some of the airplanes used to determine the proposed primary runway length may not be based (i.e. stored) at the Airport, but according to MACNOMS and TFMSC data, they have used the</p>



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			<p>Airport on a transient basis (i.e. arrive from other airports at which they are based).</p> <p>The Draft EA/EAW counts takeoffs, landings, and touch-and-go's at Lake Elmo Airport as operations, and does not consider flyovers. The FAA's audit and resulting change in how the air traffic control counts operations at the St. Paul Downtown Airport (STP) does not impact the aircraft operations estimates in the Draft EA/EAW.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>89</p>	<p><b>Page A-3:</b>  The EA/EAW, third bullet states: "<b>Table 1</b> illustrates that <b>adjustments</b> were made to the scale of the MACNOMS counts to match the 2012 forecast base year operations estimates." [Emphasis added.] The EA/EAW does not adequately explain how "adjustments" are calculated. What does this actually mean? It appears to be a fudge factor.  Table 1 contains a column heading, Forecast Target." The EA/EAW is incomplete by not adequately explaining the meaning of the column. The last bullet states, "For example, there were no flight tracks for helicopter arrivals or touch-and-goes in the dataset, but there were flight tracks for helicopter departures. Therefore, the helicopter arrivals and touch-and goes were modeled based on helicopter departure data". The EA/EAW is inadequate by failing to consider that two helicopters, based at Lake Elmo Airport, were sold.</p>	<p>See response to Comment ID 88, above.</p> <p>The Draft EA/EAW adequately and completely explains the methodology used in determining the base year (2016) aircraft operations estimates using the methodology described in Section 1.2 of Appendix A. To determine operational fleet mix estimates used in the EA/EAW, Mead &amp; Hunt conducted a detailed analysis of operations specific to Lake Elmo Airport using the best available data from both the FAA Traffic Flow Management System Counts (TFMSC) and the MACNOMS databases.</p> <p>Table 1 on Page A-3 describes the methodology used in establishing the base year fleet mix for the Lake Elmo Airport Long Term Comprehensive Plan (LTCP), which is a high-level planning document, not a thorough environmental review. The meaning of the columns is described in the narrative text preceding the table. The LTCP used the <i>Minneapolis-St. Paul Reliever Airports Activity Forecasts Technical Report</i></p>

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			<p>(revised in October 2014) to establish percentage shares of base year operations per aircraft category. The LTCP noise evaluation used adjustment factors based on the difference between the MACNOMS operations count for each aircraft engine type category and the share of operations from the Reliever Airports Activity Forecasts. The forecast targets are the base year operations estimates by aircraft engine type category described on Page A-2.</p> <p>It is important to note that some of the airplanes and helicopters used to conduct the noise study may not be based (i.e. stored) at the Airport, but according to MACNOMS and TFMSC data, they have used the Airport on a transient basis (i.e. arrive from other airports at which they are based).</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>90</p>	<p><b>Page A-4:</b>  Paragraph 3 references the closed FAA enroute radar systems, terminal secondary surveillance systems, Airport Surface Detection Equipment (ASDE-X) systems &amp; Wide Area Multilateration (WAM) site, presumably to Minneapolis-St. Paul Airport. The EA/EAW is inaccurate by failing to explain the accuracy of each system at Lake Elmo. The EA/EAW is inadequate by failing to address the issue: whether or not aircraft can fly below radar and still be counted and be legal. The last paragraph states there were 19,757 total aircraft flight tracks captured by MACNOMS at Lake Elmo Airport in 2016 per Mead &amp; Hunt. The EA/EAW does not adequately describe how these numbers are derived, whether or not they are</p>	<p>See response to Comment ID 88, above.</p> <p>According to 14 CFR 91.119 – Minimum safe altitudes, aircraft need to operate at least 500 feet above any sparsely-populated areas, except during takeoff or landing.</p> <p>See response to comment regarding military operations on Page 4-5, Comment ID 73 above.</p>

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		<p>calculated or actual numbers, and whether or not the numbers include touch-and-goes. The EA/EAW is inadequate by failing to explain what happened to the 14,000+ military operations, stated in the EA/EAW, page 4-5.</p>	
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>91</p>	<p><b>Page A-7:</b>  Paragraph 1 states: “<i>Local Operations:</i> There were 10,880 MACNOMS flight tracks in 2016, or 58.6% of total flight tracks, which represent local operations at Lake Elmo Airport. This is consistent with the January 2017 FAA Terminal Area Forecast, which estimates that approximately 61.2% of aircraft activity at Lake Elmo Airport consists of local operations.” The EA/EAW is inadequate by failing to describe how “flight tracks” relate to operations? (They don’t match.) It is important to reference, again, St. Paul Pioneer Press, April 1, 2018 contains an article “St. Paul Airport Flight Ops in a Stall ...” in which the FAA is reported to have changed its method of counting “operations” and now exclude flyovers. The EA/EAW is incomplete without explaining this discrepancy</p>	<p>See response to Comment ID 88, above.</p> <p>The Draft EA/EAW counts takeoffs, landings, and touch-and-go’s at Lake Elmo Airport as operations, and does not consider flyovers. The FAA’s audit and resulting change in how the air traffic control counts operations at the St. Paul Downtown Airport (STP) does not impact the aircraft operations estimates contained in the Draft EA/EAW.</p> <p>MACNOMS collects flight track data through a multi-sensor surveillance data feed available for the U.S. National Airspace System. The data feed is a fusion of multiple data collection services, including data from a privately-owned network of Automatic Dependent Surveillance-Broadcast (ADS-B) sensors, FAA en route and terminal secondary surveillance data, FAA Airport Surface Detection Equipment Model X (ASDE-X) data, FAA Wide Area Multilateration (WAM) data, and FAA flight plan data.</p> <p>All MACNOMS flight tracks with a start point or end point within a 5km (3.1 mile) radius and 1km (0.6 mile) ceiling (above ground level) around Lake Elmo Airport are included in the Airport operations data. If the starting point of a track is within the radius and ceiling thresholds and it is at least 2.5km in length, it</p>

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			<p>is considered a departure operation. If the endpoint of a track is within the radius and ceiling thresholds and it is at least 3.5km in length, it is considered an arrival operation. If both start and end points of a track are within the radius and ceiling thresholds, it is considered a touch and go operation.</p> <p>Using this Lake Elmo Airport flight track data, a runway use analysis can be conducted using geospatial best-fit methodology to assign the runway for each flight operating at the Airport. Runway assignments are made by taking the aircraft flight tracks and comparing their geometry to a trapezoid and extended runway centerline for each runway at the airfield. Each trapezoid runs along the axis of the runway centerline beginning at the runway end and extending 5km (3.1 miles). The trapezoid is 0.4km (.25 miles) wide at the runway end and 2km (1.2 miles) wide at the extent furthest from the runway. For the purposes of the runway use analysis, the last five or first five data points of each flight track in the vicinity of Lake Elmo Airport are analyzed relative to the runway trapezoids. The aircraft tracks that intersect a trapezoid are then compared to an extended runway centerline of the runway with additional weighting given to the segment of the track closest to the runway end to assign the runway that best fits the flight track geometry.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17,	92	<b>Page A-9:</b> Paragraph 1 states: "Mead & Hunt concluded that the 5,156 operations for which the origin/destination airport is unknown represent	The Draft EA/EAW completely and adequately provides supporting data on Pages A-8 and A-9 describing the methodology used in estimating the base year (2016) aircraft operations and fleet mix. As

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2018 (on behalf of West Lakeland Township)		flights between Lake Elmo and airports outside the Twin Cities metro area.” The EA/EAW is inadequate by failing to provide the supporting data.	described on Page A-8, MACNOMS recorded the aircraft type for 895 of the 5,516 flights in 2016 for which the origin/destination airport was unknown. The fleet mix for these 895 flights is very similar to the fleet mix for the 350 non-metro itinerant flights for which the aircraft type is known. The similarity of the fleet mix for these two flight categories strongly suggests that the flights for which the origin/destination is unknown are consistent with flights to or from airports outside the Twin Cities metro area. This is also supported by the fact that MACNOMS captures flight tracks at all Twin Cities metro area airports, and therefore the origin and destination for both local flights and flights between Twin Cities metro area airports should already be captured.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	93	<b>Page A-11:</b> Table 12 contains estimates. The EA/EAW is adequate by failing to provide the data supporting these estimates.	Appendix A of the Draft EA/EAW accurately and completely explains the methodology used to establish the base year operations estimates for both the LTCP base year (2012) on Pages A-2 and A-3 and the EA/EAW base year (2016) on Pages A-4 through A-11.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	94	<b>Page A-12:</b> Table 13 lists eight make/model turboprop aircraft. These aircraft require jet fuel. Therefore, the EA/EAW is inaccurate by failing to consider whether or not the aircraft are really <b>at</b> Lake Elmo Airport. (See also comments to page A-20 below.	The aircraft listed in Table 13 of the EA/EAW represent a combination of aircraft based (i.e. stored) at Lake Elmo Airport and aircraft which use the Airport on a transient basis (i.e. arrive from other airports at which they are based). A detailed analysis was conducted as part of the EA/EAW, as described in Appendix A, to evaluate the Lake Elmo Airport operations and aircraft type mix using the FAA’s

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			<p>Traffic Flow Management System Counts (TFMSC) and the MACNOMS flight tracks associated with actual flight operations at Lake Elmo Airport.</p> <p>It is important to note that some of the airplanes used to determine the proposed primary runway length may not be based (i.e. stored) at the Airport, but according to MACNOMS and TFMS data, they have used the Airport on a transient basis (i.e. arrive from other airports at which they are based). Jet fuel may be purchased at other airports at which the aircraft operate. Therefore the lack of jet fuel for purchase at Lake Elmo Airport does not mean these aircraft do not use Lake Elmo Airport.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	95	<p><b>Page A-13:</b> Table 14 references an estimate of the Operational Fleet Mix. The EA/EAW is incomplete without containing the study and data upon which the estimate is based.</p>	<p>The methodology used to derive the operational fleet mix estimate shown in Table 14 is described on Page A-11 of the EA/EAW and is supported by detailed data shown in Table 13.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	96	<p><b>Page A-15:</b> Paragraph 1 states: “The estimated total of 25,596 operations at Lake Elmo Airport in 2016 is consistent with the Base Case LTCP forecast, which projected between 25,000 and 26,000 operations for 2016. The LTCP included High Range and Low Range forecasts ...” It is important to reference again: St. Paul Pioneer Press, April 1, 2018 contains an article “St. Paul Airport Flight Ops in a Stall ...” in which the FAA is</p>	<p>A detailed analysis was conducted as part of the EA/EAW, as described in Appendix A, to evaluate the Lake Elmo Airport operations and aircraft type mix using the FAA’s Traffic Flow Management System Counts (TFMSC) and the MACNOMS flight tracks associated with actual flight operations at Lake Elmo Airport.</p> <p>The Draft EA/EAW counts takeoffs, landings, and touch-and-go’s at Lake Elmo Airport as operations,</p>



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		<p>reported to have changed its method of counting “operations” and now exclude flyovers. The EA/EAW is incomplete without explaining this discrepancy.</p> <p>Furthermore, the latest FAA aircraft count at Lake Elmo Airport (February 26, 2018) finds there are 183 aircraft based there: 178 single engine, 4 multi engine and 1 helicopter, which is less than the total number (208) projected for the “Base Case scenario in Table ES-1 of the Lake Elmo Airport 2035 Long Term Comprehensive Plan and which is less than the number cited on page 4-5 (Table 4-1) of the EA/EAW. The EA/EAW is incomplete without reconciling these discrepancies.</p>	<p>and does not consider flyovers. The FAA’s audit and resulting change in how the air traffic control counts operations at the St. Paul Downtown Airport (STP) does not impact the numbers contained in the Draft EA/EAW.</p> <p>Specific aircraft based at Lake Elmo Airport change from time to time. The MAC uses MnDOT’s Office of Aeronautics aircraft registration records as a source of aircraft inventory on an annual basis. Additionally, the MAC conducts routine inspections each year. This information is used to update the FAA based aircraft inventory count. The small variation between the FAA’s National Based Aircraft Inventory Program count and the based aircraft reported in Table 4-1 of the Draft EA/EAW does not change the evaluation and findings in Appendix A, nor does it change the aircraft noise evaluation.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>97</p>	<p><b>Page A-16:</b> Paragraph 2.1 states in part, “The role of the Airport is not expected to change during the 20-year planning window analyzed in the 2035 LTCP.” <b>This statement is not accurate.</b> West Lakeland Township concludes that MAC is, indeed, changing the role and classification of the airport because MAC is referencing the upper end of the 10 passenger and under aircraft, which is not here today. If West Lakeland Township’s conclusion is inaccurate, then MAC must state, <b>in writing</b>, that MAC will <b>not</b> change the role and classification of the airport.</p>	<p>The referenced page states: “The primary role of the Lake Elmo Airport is to serve personal, recreational, and some business aviation users in Washington County and the eastern portion of the Minneapolis-St. Paul metropolitan area. Example business services include flight training and aircraft maintenance... The critical aircraft to be accommodated at the Lake Elmo Airport are small, propeller-driven aircraft weighing less than 12,500 pounds with fewer than 10 passenger seats.” None of this would change because of the proposed action.</p>

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		<p>Page A-20: Footnote 3 states: “While the LTCP used a 5-knot headwind, this analysis takes into account that users often must operate with a tailwind to take off from the more favorable runway end.” The EA/EAW fails to consider why a pilot would take-off with a tailwind when there is a choice of runways at Lake Elm.</p> <p>Regarding Table 20, the Aircraft Owners and Pilots Association (AOPA) recommends JP-4 or Jet A fuel for the Beechcraft King Air 200, Pilatus PC-12, and Socata TBM 700 turbo props. The EA/EAW is inadequate by failing to confirm whether or not these aircraft are at Lake Elmo Airport today. According to the FAA document, 21D 03-06-2018 based aircraft, these aircraft are <b>not</b> at Lake Elmo Airport today.</p> <p>Finally, FAA Order JO 7110.65W (December 10, 2015) states on pages 3-8-2 and 3-9-5 that there are two separate categories of aircraft: Category 1: “small single-engine propeller driven aircraft weighing 12,500 lbs. or less, and all helicopters”; and Category 2: “small twin-engine propeller driven aircraft weighing 12,500 pounds or less.” At present, Lake Elmo Airport has only Category 1 aircraft (single engine) and small Category 2 aircraft (the largest being a twin-engine Piper PA-31P, with a maximum takeoff weight of 6,500 pounds).</p> <p>In short, MAC’s proposed plans will allow Category 1 and Category 2 aircraft up to 12,500</p>	<p>Still air conditions were used for the primary runway length analysis rather than slight headwind conditions because a pilot’s choice of runway end is influenced by multiple factors, including but not limited to:</p> <ul style="list-style-type: none"> <li>- the aircraft’s performance characteristics;</li> <li>- the runway end’s proximity to the hangar and apron areas;</li> <li>- the purpose of the flight;</li> <li>- the origination or destination of the flight;</li> <li>- the runway’s approach and departure environment;</li> <li>- available instrument approach procedures; and</li> <li>- available runway length on the primary runway when compared to the crosswind runway.</li> </ul> <p>The aircraft listed in Table 20 represent a combination of aircraft based (i.e. stored) at Lake Elmo Airport and aircraft which use the Airport on a transient basis (i.e. arrive from other airports at which they are based). Jet fuel may be purchased at other airports at which the aircraft operate. Therefore the lack of jet fuel for purchase at Lake Elmo Airport does not mean these aircraft do not use Lake Elmo Airport.</p> <p>The categories listed in FAA Order JO 7110.65W group aircraft to provide minimum distances between operations while on the same runway. These categories are intended to provide separation between aircraft for safety purposes and are used by air traffic controllers at airports with air traffic control towers. FAA categorizes aircraft differently for airport</p>

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		lbs., far larger than the Category 2 aircraft using Lake Elmo Airport today.	<p>planning purposes than it does for air traffic control purposes.</p> <p>MAC does not intend to change the role of Lake Elmo Airport and the family of aircraft it serves.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	98	<p><b>Page A-18:</b>  Paragraph 2.2 states in part, “The recommended runway length is determined according to a family grouping of airplanes having similar performance characteristics and operating weights. The 2035 LTCP states that the critical aircraft at 21D remain small, propeller-driven airplanes, weighing less than 12,500 pounds and with fewer than 10 passenger seats. The fewer than 10 passenger seat category is further divided into two fleet categories, namely, “95 percent of the fleet” or “100 percent of the fleet”. AC 150/5325-4B provides runway length curves for each of these fleet categories as illustrated below in <b>Chart 2.</b>”  FAA Order JO 7110.65W (December 10, 2015) states on pages 3-8-2 and 3-9-5 that there are two separate categories of aircraft: Category 1: “small single-engine propeller driven aircraft weighing 12,500 lbs. or less, and all helicopters”; and Category 2: “small twin-engine propeller driven aircraft weighing 12,500 pounds or less.” At present, Lake Elmo Airport has only Category 1 aircraft (single engine) and small Category 2 aircraft (the largest being a twin-engine Piper PA-31P, with a maximum takeoff weight of 6,500 pounds). Using the above criteria, the EA/EAW is</p>	<p>The categories defined by AC 150/5325-4B are the relevant categories for determining required runway length in accordance with FAA guidance.</p> <p>The EA/EAW completely explains the process for determining the required runway length at Lake Elmo Airport. Based on current activity at Lake Elmo Airport with respect to AC 150/5325-4B, the critical aircraft are small, propeller-driven airplanes, weighing less than 12,500 pounds and with fewer than 10 passenger seats. Section 205 of AC 150/5325-4B provides additional guidance on selecting which percentage of fleet is appropriate to use at a specific airport. Section 205 of the AC states that “The differences between the two percentage categories are based on the Airport’s location and the amount of existing or planned aviation activities.” The “95 percent of fleet” applies to airports serving medium populations and with a diversity of usage and potential for increased aviation activities. Also included in this category are those airports that are primarily intended to serve low-activity locations, small population communities, and remote recreational areas. This category is also considered sufficient for remote areas or airports serving small populations. By contrast, the “100 percent of fleet” applies to airports that serve communities that are</p>

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		incomplete without answering the question: Why wouldn't the 95% of fleet calculation be sufficient?	<p>located on the fringe of a metropolitan area, or a relatively large population remote from a metropolitan area. Based on the Airport's location on the fringe of a metropolitan area, the 100 percent of fleet category is most applicable for the primary runway at Lake Elmo Airport. Page A-19 of the EA/EAW states that the FAA recommended lengths are 3,300 feet and 3,900 feet for each respective fleet category. Additional information for specific aircraft types was then used to determine the proposed 3,500-foot length.</p> <p>See response to Comment ID 97, above regarding the purpose of FAA Order JO 7110.65W aircraft category definitions.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	99	<p><b>Page A-21:</b> Per charts in Lake Elmo Airport 2035 LTCP, which are from the aircraft manufacturer, the Accelerate/Stop distance for 100% useful load is: Cessna 414 is closer to 4,900 feet for given airfield conditions; Cessna 310 – 4,200 feet; and Beech Barron 58 - closer to 3500+ feet. The EA/EAW is insufficient until these discrepancies are rectified.</p> <p>The last paragraph states: "When considering the range of runway lengths for various useful load percentages, a runway length of 3,500 to 3,600 feet would accommodate most aircraft and loading conditions for aborted takeoff operations from 21D, and would accommodate all takeoff length requirements." West Lakeland Township disputes this statement because it applies to</p>	<p>In response to community input received during the LTCP process regarding the need for the proposed runway length, the MAC requested that Mead &amp; Hunt review and verify the findings of the runway length analysis conducted for the LTCP. This included a re-assessment of the listing of aircraft used to determine the appropriate runway length; re-assessment of the airfield condition assumptions used in the LTCP analysis; and independent review and analysis of aircraft performance manual data used to determine required runway lengths for each aircraft at specific useful load factors. This re-assessment resulted in some variations from the LTCP for specific aircraft types, but ultimately supported the need for the proposed primary runway length of 3,500 feet. This analysis is sufficiently explained in the EA/EAW.</p>

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		<p>perfect conditions, only for aircraft with the useful loads rating for under the 3,500' distances, and that is everything goes perfect. Nothing goes perfect when someone has to abort a takeoff. The EA/EAW is incomplete without addressing this issue.</p>	<p>The Accelerate/Stop Distances shown in Table 21 of the EA/EAW were determined using the maximum average temperature of the hottest month of the year. As aircraft performance is degraded during hot conditions, these distances do not reflect perfect conditions. In addition, the accelerate stop distance is defined in paragraph 322.c of FAA Advisory Circular 150/5300-13A as “the distance to accelerate from brake release to V<sub>1</sub> and then decelerate to a stop, plus safety factors.” These safety factors account for pilot reaction time and reflect typical operating conditions when aborting a takeoff.</p> <p>Accelerate/Stop Distance is applicable for multi-engine piston and turboprop aircraft because it is identified in the airplane flight manuals and is typically an important safety consideration for operators of these aircraft. Use of accelerate-stop distance in determining recommended runway length is consistent with AC 150/5325-4B, Section 202, which states that: “Airport designers can, instead of applying the small airplane design concept, determine the recommended runway length from airplane flight manuals for the airplanes to be accommodated by the airport in lieu of the runway length curves depicted in figures 2-1 or 2-2. For example, owners of multi-engine airplanes may require that their pilots use the airplane’s accelerate-stop distance in determining the length of runway available for takeoff.”</p>
Mr. Thomas E. Casey, Attorney at Law, Letter	100	<p><b>Page A-22:</b> Paragraph 1 states in part: “However, during periods when the runway is wet and slippery from</p>	<p>As stated in 14 CFR Part 91, “The pilot in command of an aircraft is directly responsible for, and is the final authority as to, the operation of that aircraft.” The</p>

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dated April 17, 2018 (on behalf of West Lakeland Township)		snow cover or ice, these 'contaminated' surface conditions decrease the effectiveness of braking and thereby increase the length of runway needed for landing." The EA/EAW is insufficient by failing to explain that, if an aircraft owner does not feel safe using a particular airport, then they should not use it. Safety comes first.	runway length needs analysis in the Draft EA/EAW does not remove pilot responsibility and choice in determining whether to use the Airport. As stated in Appendix A of the Draft EA/EAW, landing lengths are typically shorter than takeoff and accelerate-stop distances. In referencing the aircraft operating handbooks used by pilots, many identify a 30% increase to be added to the required landing length for slippery conditions or surface contamination. This adjustment factor for wet and slippery runway conditions was used in the runway length analysis to consider typical operating scenarios encountered by pilots and the ability of the Airport to meet user needs in these scenarios. Adjustments for wet and slippery conditions are particularly important to consider for landing operations, because inclement weather in which such runway conditions often occur may limit the options available to pilots who need to land their aircraft.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	101	<b>Page A-23:</b> Table 23 is entitled " <b>Average</b> Adjusted Landing Lengths." [Emphasis added.] The EA/EAW is inadequate by failing to explain that <i>averaging</i> makes everything appear better than it actually is. The accelerate/stop distance is referenced on this page but it fails to mention the A/S distance with a contaminated runway. Per a chart supplied by Pilatus for a PC-12, with a .125" of water on the runway, requires almost 5000 feet to stop when normally there is a dry 3,000 foot runway available. The same criteria apply for landing lengths for a contaminated runway. Thus, using	Table 23 references the average landing length requirements for individual aircraft types identified in Table 22. These aircraft types are within the representative design family of aircraft using Lake Elmo Airport. As these aircraft have similar operating characteristics, it is appropriate to use the average value to represent a typical operating condition for the entire family.  The average values for all three operational distance categories associated with the list of critical design airplanes (takeoff distance, accelerate-stop distance, and landing distance) differ by less than 125 feet from



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		<p><i>average</i> understates the actual or real numbers for a particular aircraft.</p> <p>The last paragraph state in part, “Based on the analysis of 2016 MACNOMS data presented in Section 1, approximately 97% of operations on Runway 04/22 are conducted by single-engine piston aircraft, nearly all of which weigh less than 5,000 pounds. Furthermore, the 2016 MACNOMS data indicate that approximately 25% of total aircraft operations at Lake Elmo Airport take place on Runway 04/22.” The EA/EAW is insufficient by failing to provide the data to show how MACNOMS actually tell <b>which</b> runway an aircraft uses.</p>	<p>the median values for all scenarios considered. Median values have been added to Appendix A, Tables 20 through 22, for comparison with the averages. The similarity of the average and median values indicates that the required runway length is not skewed either upward or downward by averaging.</p> <p>The proposed runway length at Lake Elmo Airport is not intended to accommodate all of the aircraft types in the design aircraft family under all weight, operational, and/or weather conditions. Rather, it is intended to accommodate a majority of design aircraft operations at typical operating weights and weather conditions in a manner that balances user needs with minimizing impacts to the local community and environment.</p> <p>For the purposes of determining the required runway lengths at airports, the FAA considers wet and slippery runway surface conditions for only landing operations.</p> <p>MACNOMS collects flight track data through a multi-sensor surveillance data feed available for the U.S. National Airspace System. The data feed is a fusion of multiple data collection services, including data from a privately-owned network of Automatic Dependent Surveillance-Broadcast (ADS-B) sensors, FAA en route and terminal secondary surveillance data, FAA Airport Surface Detection Equipment Model X (ASDE-X) data, FAA Wide Area Multilateration (WAM) data, and FAA flight plan data.</p>

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			<p>All MACNOMS flight tracks with a start point or end point within a 5km (3.1 mile) radius and 1km (0.6 mile) ceiling (above ground level) around Lake Elmo Airport are included in the Airport operations data. If the starting point of a track is within the radius and ceiling thresholds and it is at least 2.5km in length, it is considered a departure operation. If the endpoint of a track is within the radius and ceiling thresholds and it is at least 3.5km in length, it is considered an arrival operation. If both start and end points of a track are within the radius and ceiling thresholds, it is considered a touch and go operation.</p> <p>Using this Lake Elmo Airport flight track data, a runway use analysis can be conducted using geospatial best-fit methodology to assign the runway for each flight operating at the Airport. Runway assignments are made by taking the aircraft flight tracks and comparing their geometry to a trapezoid and extended runway centerline for each runway at the airfield. Each trapezoid runs along the axis of the runway centerline beginning at the runway end and extending 5km (3.1 miles). The trapezoid is 0.4km (.25 miles) wide at the runway end and 2km (1.2 miles) wide at the extent furthest from the runway. For the purposes of the runway use analysis, the last five or first five data points of each flight track in the vicinity of Lake Elmo Airport are analyzed relative to the runway trapezoids. The aircraft tracks that intersect a trapezoid are then compared to an extended runway centerline of the runway with</p>

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			<p>additional weighting given to the segment of the track closest to the runway end to assign the runway that best fits the flight track geometry.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>102</p>	<p><b>Page A-24:</b>  The first 6 aircraft in Table 24 require a takeoff runway length greater than the 2,500 feet, currently there today. The first 5 aircraft require a takeoff runway length greater than the 2,750 feet that is proposed. The EA/EAW is insufficient by failing to explain why these aircraft are included in the Table.</p>	<p>The aircraft listed in Table 24 of the EA/EAW were selected for analysis because they are a representative cross section of the lower crosswind capable airplanes using the primary runway. As stated at the beginning of Appendix A, Section 2.5 of the EA/EAW, the proposed crosswind runway length is based on the needs of this group of aircraft, as FAA recommends in Advisory Circular 150-5325-4B. This is sufficiently explained in the EA/EAW.</p> <p>These lower crosswind capable airplanes within the design aircraft family collectively conduct over 500 annual operations on the crosswind runway at Lake Elmo Airport, which exceeds the regular use threshold as defined by FAA AC 150/5325-4B and AC 150/5000-17. The group of aircraft shown in Table 24 represents the aircraft that conduct the majority of operations on the crosswind runway. The method used to establish the recommended crosswind runway length in Chapter 2 and Appendix A is based on balanced consideration of the needs of the design aircraft family and is not based on the needs of an individual aircraft. This is appropriate based on the diversity of aircraft types and users at the airport, and is consistent with AC 150/5325-4B, Section 206, which selectively groups performance information from individual airplane flight manuals to establish recommended runway length.</p>

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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	103	<b>Page A-25:</b> The EA/EAW is incomplete by failing to state: If the runways at Lake Elmo are too short for aircraft, there are airports nearby: South St. Paul and St. Paul that are 10 nautical miles away; and New Richmond, Wisconsin is 16 nautical miles away.	Use of alternate existing airports is considered as an alternative in Chapter 3, Section 3.2.2, Pages 3-3 through 3-5.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	104	<b>Appendix B – 30th Street North Realignment Alternatives Review</b> <b>Page 34 (pdf number):</b> The last sentence states in part, "... which categorizes this soil type as <b>fair to poor</b> for use as a roadway subgrade material". [Emphasis added.] The EA/EAW is insufficient by failing to adequately describe the environmental, along with the cost and maintenance consequences of building a road in this soil type.	This statement is a general soil characteristic provided by the National Resources Conservation Service Web Soil Survey. The soil service characterization notes "The limitations can be overcome or minimized by special planning, design, or installation." As part of the continued design of the roadway, a geotechnical analysis will be completed to analyze the site in more detail, develop a pavement design that meets the service life and needs of the roadway, and provide geotechnical recommendations for the roadway subgrade. This is a standard practice for roadway design.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	105	<b>Page 41 (pdf number):</b> Paragraph 2 states in part: "Based on fleet capacity and planned extension of water services to new residential areas immediately west of the airport, the project team does not believe that the changes in travel times shown in Table 2 represent an adverse effect to water shuttles that cannot be mitigated by available means". The EA/EAW is inadequate by failing to consider that fire trucks don't travel as fast and are not as agile as cars, especially during inclement weather.	In development of the preferred alternative, the Bayport Fire Department was consulted to coordinate the layouts and obtain information on the department's fleet of vehicles and operations in the area. Additionally, the preferred alternative considers the appropriate design vehicles as established by the MnDOT roadway design manual guideline. Chapter 2-3.02 of the manual states: "Typically, the WB-19 (WB-62) (semi tractor-trailer combination) is used to design highway facilities and intersections; however, the designer may encounter locations and situations where the use of a smaller design vehicle should be

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		<p>Paragraph 5 (“Alternative Review”) states in part: “Neal Avenue to the immediate south of 30th Street N is functionally classified as a local road, which ‘connect blocks within residential neighborhoods as well as commercial and industrial areas.’” This statement is inaccurate; there are no commercial or industrial areas on Neal Ave. It is zoned Single Family Estates (SFE).</p>	<p>considered.” Standards were incorporated to accommodate the WB-19 (WB-62) (semi tractor-trailer combination) design vehicle and the fleet information provided by Bayport Fire Department.</p> <p>The “local road” definition is a general definition used by the Federal Highway Administration. It is not intended to indicate that all of these uses are located adjacent to the road, but that local roads provide access to residents as a means to travel to commercial and industrial uses every day for work and other activities.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>106</p>	<p><b>Page 42 (pdf number):</b>  Paragraph C states in part: “Posted speed limits are relatively high in the project area. The following posted speed limits were observed within the project area ...” All road speed limits in Minnesota are set by MnDOT, as was 30th Street and Neal Avenue.</p>	<p>Minnesota Statutes 169.14 sets forth the requirements for speed limit in the state. The speed limit is set by MnDOT when requested. In absence of a request to MnDOT for a speed limit, the speed limit defaults to statutory limits, which is 55 mph for 30<sup>th</sup> Street North. The speed limits used to calculate changes in travel time in EA/EAW Appendix B are based on the roadway design and the associated vehicle for which the roadway will be designed. Final speed limits will be at the discretion of MnDOT following construction, when a speed study is requested.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>107</p>	<p><b>Page 48 (pdf number):</b>  Paragraph 1 states in part: “Design characteristics and travel time increases associated with Alternatives 4A and 4B are preferable to those associated with Alternative 3. However, these new alternatives would be more costly to implement.” The EA/EAW is incomplete by failing to state that the Bayport Fire Department nixed Alternatives 4A and 4B because of the physics of fire trucks in</p>	<p>It is incorrect to state that the Bayport Fire Department rejected Alternatives 4A and 4B as suggested by this comment, and therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as incomplete. The reasons that Alternatives 4A and 4B were eliminated from further consideration are described in Chapter 3, Page 3-19 of the Draft EA/EAW: “At CEP meetings held on May 25 and August 8, 2017, there was not a</p>

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		<p>roundabouts, the intersection of 4B, and building an additional cul-de-sac for two homes on Neal Ave.</p> <p>The EA/EAW is insufficient if it does not consider the implications of an e-mail chain between the West Lakeland Township attorney and the MAC attorney:</p> <p>“If one of the townships fails to relinquish the 30th Street road right of way (ROW) to MAC, in order to construct the 3,500’ runway, MAC would take the ROW by eminent domain. Once that is done apparently they can’t use federal funds to reconstruct the realigned section of 30th Street and MAC would be required to compensate the townships for the loss of the road and 30th Street would essentially be vacated. MAC doesn’t have the authority to vacate roads. “Further, if the townships agree to give MAC the ROW, why would WLT agree to take a road that does not meet MnDOT design standards according to the township engineer? West Lakeland Township would contend that MAC can’t force a road upon them that they don’t want and doesn’t meet MnDOT design standards. Baytown has stated that they would be willing to move the township boundary in order to maintain the cost share for the maintenance of 30th Street. Once brought to the attention of Baytown why would they want a road that does not meet MnDOT design standards? “In additional if the township boundary was changed to match the realigned section of 30th Street, West Lakeland Township would</p>	<p>consensus among the panel members that the adjustments made under Alternatives 4A and 4B would be preferable to the design concept represented by Alternative 3. Because Alternatives 4A and 4B would be more expensive to construct than Alternative 3, it was determined that the additional investment required by these alternatives would not be justified based on CEP input. For these reasons, Alternatives 4A and 4B will not be considered further.”</p> <p>The e-mail chain excerpt that is included in the comment is not correspondence between the West Lakeland Township attorney and a MAC attorney. As noted in Section 5.12 of the EA/EAW, “The proposed action includes extinguishing the prescriptive easement for 30<sup>th</sup> Street North and seeking, as appropriate, a land release from the Federal Aviation Administration (FAA) to allow for realignment of 30<sup>th</sup> Street North near the new Runway 32 Runway Protection Zone (RPZ) to reconnect with the existing Neal Avenue North intersection. Realignment of the township collector road 30<sup>th</sup> Street North and conveyance of an appropriate property interest to the appropriate local government authority/authorities will be determined following completion of this EA/EAW.” The MAC is open to continuing discussions to find a solution whereby 30<sup>th</sup> Street North may continue to exist as a realigned through street.</p> <p>For more information regarding the design standards associated with the preferred 30<sup>th</sup> Street North</p>



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		<p>contend this is forced annexation upon them by MAC which they don't have that authority." When the subject of the realigned section of 30th Street not meeting MnDOT Design Standards was brought forth to MAC in an earlier conversation, MAC stated they had a waiver from MnDOT for such a design. But that doesn't address the issue that in Baytown's ordinances and in West Lakeland's ordinances (8.10.1) it states: "Proposed streets shall conform to the state, county or local road plans or preliminary plans as have been prepared, adopted and/or filed as prescribed by law" [Emphasis added.]. The EA/EAW is incomplete until this issue is addressed.</p>	<p>realignment alternative, see response to Mr. Ryan Stempiski Comment ID 171, below.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>108</p>	<p><b>Appendix C – Wetland Delineation, Functional Assessment, and Associated Correspondence</b>  <b>Sub-Appendix H - MNRAM Functional Assessment Forms</b>  <b>Page 265 (pdf number):</b>  In the Wetland Functional Assessment Summary chart, Wetland #1's Sensitivity to Storm water &amp; Urban Development is rated "<b>Exceptional.</b>" The EA/EAW inadequately addresses the potential for a significant environmental impact on this wetland.</p>	<p>Wetland #1, as delineated within the project area of interest, is a cultivated farm field between the unnamed MN public water wetland 82-461W and 30<sup>th</sup> Street. The calculated rating of "Exceptional" for the Sensitivity to Storm water &amp; Urban Development in the Functional Assessment derives from the plant community classification (Seasonally-flooded basin – code 16B) used in the MNRAM Functional Assessment Database. There is no plant community database entry option available for farm fields. The existing Valley Branch Watershed District functional assessment of public water wetland 82-461W (to which Wetland 1 connects) rates the Sensitivity to Storm water &amp; Urban Development as moderate. Therefore, the "Exceptional" rating is a database artifact and a rating of "Moderate" is more representative of on-site conditions.</p>

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			<p>As shown in EA/EAW Figure 5-4, a direct wetland impact of 0.06 acres is estimated for Wetland #1, and therefore the MAC disagrees with West Lakeland Township's characterization of the analysis of impacts to this wetland as inadequate.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>109</p>	<p><b>Appendix D – Section 106 Documentation and Correspondence</b>  <b>Page 297 (pdf number):</b>  The last paragraph states in part: “Aircraft size and type will <b>not</b> change from what is currently landed on the runways adjacent to the railroad corridor.” [Emphasis added.] This statement is inaccurate and misleading because the aircraft in the upper end of the 10-passenger category, and slightly under the next category, are not at Lake Elmo Airport today, but could use Lake Elmo Airport after the planned runway expansion. Furthermore, FAA Order JO 7110.65W (December 10, 2015) states on pages 3-8-2 and 3-9-5 that there are two separate categories of aircraft: Category 1: “small single-engine propeller driven aircraft weighing 12,500 lbs. or less, and all helicopters”; and Category 2: “small twin-engine propeller driven aircraft weighing 12,500 pounds or less.” At present, Lake Elmo Airport has only Category 1 aircraft (single engine) and small Category 2 aircraft (the largest being a twin-engine Piper PA-31P, with a maximum takeoff weight of 6,500 pounds).  In short, MAC’s proposed plans will allow Category 1 and Category 2 aircraft up to 12,500</p>	<p>See response to Comment ID 58, above regarding expected increases in operations by multi-engine piston, turboprop, and jet aircraft.</p> <p>See response to Comment ID 97, above regarding the purpose of FAA Order JO 7110.65W definitions.</p>

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		lbs., far larger than the Category 2 aircraft using Lake Elmo Airport today.	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	110	<p><b>Appendix E – U.S. Fish &amp; Wildlife Section 7 Consultation and Correspondence Page 436 (pdf number):</b></p> <p>The second line in the correspondence from Mr. Horton states in part, "... project <b>may</b> affect, but is not likely to adversely affect the northern long-eared bat." [Emphasis added.] The EA/EAW is inadequate because it fails to analyze the impact of removing 20-acres of trees, <b>habitat</b> for the long-eared bat.</p>	<p>USFWS concurrence with the FAA finding of "may affect but is not likely to adversely affect" considers habitat effects on the northern long-eared bat. The USFWS concurrence means that, assuming appropriate avoidance measures are employed, further analysis of the removal of trees is not required with respect to northern long-eared bat habitat. FAA Order 1050.1F, Exhibit 4-1, indicates the significance threshold for special status species is based on its potential for adverse impacts to these species or their habitats, and USFWS concurrence with the FAA finding of "may affect but is not likely to adversely affect" sufficiently establishes that adverse impacts to this species or its habitats should not be expected.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	111	<p><b>Pages 439-440 (pdf number):</b></p> <p>The last paragraph of page 339 states in part: "The bees gather pollen and nectar from a variety of flowering plants and prefer tallgrass prairie habitat." The EA/EAW fails to acknowledge that there is such habitat near the wetlands. A rusty-patched bumble bee (RPBB) survey must be undertaken after the queen bee's eggs have hatched and the workers are foraging. It is unclear when, in the month of June, the field survey described on page 440 was undertaken. The survey may have been too early in June, or too early in the day – and too perfunctory - to adequately search for RPBB. Unless a full study has been done where worker bees are actually</p>	<p>The dominant emergent vegetation near the wetlands are grasses with a low diversity, quantity, and range of bloom length/time of native and non-native flowering forbs suitable for the RPBB and its requirement for pollen and nectar throughout a growing season. Grasses are wind-pollinated and do not provide pollen for bees. According to the USFWS website, last updated April 2, 2018, the Airport is in a Low Potential Zone for the RPBB and Section 7 consultation with the USFWS is not required for projects outside of RPBB high potential zones (<a href="https://www.fws.gov/midwest/endangered/insects/rpbb/rpbbmap.html">https://www.fws.gov/midwest/endangered/insects/rpbb/rpbbmap.html</a>). Nevertheless, as described in Section 5.2.2 of the EA/EAW, the FAA conducted Section 7 consultation with the USFWS for the RPBB, and the USFWS concurrence with the FAA finding of</p>

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		out gathering nectar, the EA/EAW is inadequate and incomplete.	“may affect but is not likely to adversely affect” for this species sufficiently establishes that adverse impacts to this species or its habitats should not be expected according to FAA Order 1050.1F, Exhibit 4-1. The area is not conducive to pollinator-dependent species due to lack of suitable vegetation and management practices that limit availability of forage for the RPBB. The USFWS does not require surveys for bees in areas outside of high potential zones. The Airport is not in a high potential zone for the RPBB, and therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as inadequate and incomplete. Additionally, areas near wetlands with pollen and nectar producing forbs are currently mowed multiple times during a growing season and do not provide RPBB habitat.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	112	<b>Page 440 (pdf number):</b> The first paragraph, last sentence states: “No bald or golden eagles were observed during the field work.” In fact, bald eagles and turkey vultures have been observed numerous times, along with trumpeter swans and sandhill cranes. Obviously, EA/EAW is incomplete; observing multiple days in June is not enough time to adequately catalog the wildlife there.	The Bald and Golden Eagle Protection Act (BAGEPA) (16 U.S.C. 668-668c) provides for the protection for eagles. The Migratory Bird Treaty Act, 16 U.S.C. §§ 703–712 (MBTA), provides for the protection of turkey vultures, sandhill cranes and trumpeter swans. The activities proposed at the Airport do not violate either the BAGEPA or the MBTA. The proposed activities at the Airport do not interfere with a Bald Eagle’s ability to forage, nest, roost, breed, or raise young. There is no eagle nesting habitat within the Airport property. Other migratory birds such as vultures, swans and cranes do not require surveys under the MBTA because they are transient during migration and are not known to nest on Airport property. Therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as incomplete.

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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	113	<p><b>Appendix G – USDA NRCS Farmland Conversion Impact Rating Form AD-1006 Page 464 (pdf number):</b></p> <p>The EA/EAW language causes the same concern as stated in the farmland information in the EA/EAW, page 5-9 above. West Lakeland Township asserts that the Farmland Conversion Impact Rating is low and so does the Department of Agriculture when contacted. The number of row crop acres to be removed is more than stated, plus there are acres to be converted from row crops to rusty patched bumblebee habitat flowers. The Green area cannot be the only area counted for removal of crop land. Farmers do not like to plant row crops in irregular shapes or around tight curves. Furthermore, based on Figure 4-8, West Lakeland Township calculates that areas that are currently mowed for hay production, that will be removed, is estimated to be approximately 50 plus acres. In sum, the EA/EAW is inaccurate and incomplete.</p>	See response to Minnesota Department of Agriculture, Comment ID 1, above.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	114	<p><b>Appendix H – Environmental Site Assessment Report Page 481 (pdf number):</b></p> <p>The fourth line from the top references the FEMA floodplain map. The Valley Branch Watershed District has its own 100-year flood level map, which is different from FEMA's. The EA/EAW is incomplete; these differences must be reconciled. The first full paragraph references Canada thistle being there. Canada thistle is an evasive species and should be removed. The EA/EAW is</p>	<p>See response to Comment ID 86, above regarding FEMA and VBWD floodplain maps.</p> <p>The small population of Canada thistle present at the Airport is managed by mowing. Removal is not required. Minnesota DNR considers mowing an acceptable mechanical control method.</p>

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		inadequate by failing to discuss the environmental impacts of the various removal options.	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	115	<b>Page 483 (pdf number):</b> Paragraph 5 states in part: “No evidence of underground storage tanks (USTs) ... were noted.” The EA/EAW is inaccurate. There is a Holiday gas station, located 1,000 feet from the northwest corner of MAC property. This is not covered in the text, but is listed in table 2 (pdf page 487). The EA/EAW fails to resolve this inconsistency.	The referenced statement is made in the context of observations by Mead & Hunt staff along the perimeter of the Airport property. The six active underground storage tanks (USTs) associated with Holiday gas station were evaluated and discussed in EA/EAW Appendix H, Section 6. These sites, identified as Sites 12, 13, and 14, are depicted on the Potentially Hazardous Materials Site Locations graphic and reported in the Site Reports contained in Appendix H of the EA/EAW. The USTs at the Holiday gas station will not be affected by the proposed action.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	116	<b>Page 490 (pdf number):</b> Site 10 is listed as an active permit is for monitoring effluent from airport maintenance activities (e.g., runoff of de-icing materials).” The EA/EAW is incomplete by failing to address the extent to which de-icing materials are being used a Lake Elmo, and the environmental impacts of increased demand.	See response to Washington Conservation District Comment ID 26, above.  As discussed in Appendix H of the Draft EA/EAW, Site 10 is owned by Valters Aviation and is regulated by an Industrial Stormwater Permit. The MAC does not expect the proposed project will result in an increase in the amount of aircraft deicing fluid used by Valters.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	117	<b>Page 555 (pdf number):</b> This page references “glycol-based de/anti-icing chemicals” again and that the Minnesota Pollution Control Agency (MPCA) has approved a permit for its use. The EA/EAW is incomplete by failing to address the extent to which de-icing materials are being used a Lake Elmo, and the environmental impacts of increased demand. If these chemicals are <b>not</b> being used at Lake Elmo Airport, the	As discussed in Appendix H of the Draft EA/EAW, the MAC has an industrial stormwater Multi-Sector General Permit for its pavement de-icing activities at Lake Elmo Airport. The permit applies to Airports, Flying Fields, and Airport Terminal Services in subsector S2 for Airports using less than 100,000 gallons of glycol-based de/anti-icing chemicals and/or annual average of less than 100 tons of urea. The use of pavement deicing materials remains well



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		EA/EAW is insufficient when it fails to explain why they mentioned in the EA/EAW.	<p>below the annual permitted levels of urea. The MAC does not use glycol-based chemicals. The MAC does not expect that the project will result in a substantial increase in overall chemical deicer use. Some increase may occur because of the increase in impervious surface, however it is not expected to exceed the levels of the current Multi-Sector General Permit.</p> <p>See response to Washington Conservation District Comment ID 26, above.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	118	<p><b>Page 580 (pdf number):</b> This page contains a third reference to glycol-based de/anti-icing chemicals”, with a different date than the page 555 reference above. The EA/EAW is inadequate by failing to state how long these – or other de/anti-icing chemicals have been used at Lake Elmo Airport.</p>	<p>See response to Washington Conservation District Comment ID 26, and Comment ID 117 above.</p> <p>The MAC has been permitted to use deicing chemicals at the Airport for decades and has always remained well below annual permit levels.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	119	<p><b>Appendix J – Aircraft Noise Analysis Report Page 698 (pdf number):</b> This page references a memo requesting non-standard Aviation Environmental Design Tool (AEDT) aircraft substitutions. The EA/EAW is incomplete by failing to explain why these substitutions being made. According to the FAA Lake Elmo Airport base list (dated 2/26/18), the Piper PA-44, P-68 Observer, Rockwell Commander 112, Van’s aircraft types and the Diamond Twin Star are not based at Lake Elmo Airport. The EA/EAW is incomplete by failing to</p>	<p>Operations by these aircraft types at Lake Elmo Airport were confirmed based on MACNOMS and TFMSC data as shown in EA/EAW Appendix A, Table 13. Correspondence between Mead &amp; Hunt and FAA regarding the non-standard AEDT aircraft substitutions is included at the beginning of Appendix J. AEDT includes detailed noise profiles for a select group of aircraft types. For most aircraft that do not have a detailed noise profile in AEDT, the FAA has identified standard substitution profiles with similar characteristics. As stated in the EA/EAW Appendix J correspondence, Mead &amp; Hunt identified six aircraft</p>

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		explain how MAC knows these planes even use Lake Elmo Airport.	types that operate at the Airport and are not available in AEDT for which FAA has not identified a standard substitution. FAA must approve the noise profiles substituted by the noise modeler for such aircraft types. This information is completely explained in the EA/EAW.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	120	<p><b>Page 703 (pdf number):</b>  The last paragraph states in part: “Approximately 30% of turboprop arrivals and no jet arrivals occur on Runway 14 in the 2016 baseline and 2025 no-action scenarios, whereas approximately 45% of turboprop arrivals and 33% of jet arrivals occur on Runway 14 in the 2025 ‘with project’ scenarios. In all scenarios, all multi-engine turboprop and jet aircraft operations are expected to occur on the primary runway.” With no jet fuel at Lake Elmo, the EA/EAW is inadequate by failing to explain MAC knows that turboprop aircraft use Lake Elmo Airport. The EA/EAW is incomplete by failing to explain whether or the aircraft counting method is the same as described in the April 1st St. Paul Pioneer Press.</p>	<p>Operations by turboprop aircraft at Lake Elmo Airport were confirmed based on MACNOMS and TFMSC data as shown in EA/EAW Appendix A, Table 13. Jet aircraft use of the Airport is very infrequent but does occur occasionally. As shown in Appendix A, Table 17, turboprop operations accounted for 0.25% of total operations in 2016, while jet aircraft operations accounted for 0.01% of total operations. The EA/EAW adequately explains this.</p> <p>As noted in response to Comment ID 88, the Draft EA/EAW counts takeoffs, landings, and touch-and-go’s at Lake Elmo Airport and does not consider flyovers. The FAA’s audit and resulting change in how the air traffic control counts operations at the St. Paul Downtown Airport (STP) does not impact the numbers contained in the Draft EA/EAW.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	121	<p><b>Appendix L – Public Involvement Page 1028 (pdf last page):</b>  The chart explains the next steps in the environmental review process. However, nowhere is it mentioned an Environmental Impact Statement (EIS) is even a possibility. Furthermore, the public hearing, conducted on April 4, 2018, provided no information – oral or</p>	The third paragraph on Page 1-5 of the Draft EA/EAW states: “The EA/EAW is prepared in accordance with the procedural provisions of NEPA and MEPA. The FAA must evaluate this EA/EAW under NEPA and issue a Finding of No Significant Impact (FONSI), or prepare a federal Environmental Impact Statement (EIS). The MAC must evaluate this EA/EAW under MEPA and issue a Negative

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		<p>written – that an Environmental Impact Statement is a possibility. In fact, a MAC representative (employed Mead &amp; Hunt) stated there were not significant environmental effects, insinuating that a “no need” determination is a <i>fait accompli</i>. This is unacceptable.</p>	<p>Declaration on the Need for an EIS or prepare a Minnesota EIS.”</p> <p>Under MEPA, an EIS is only necessary if there is a potential for significant environmental effects and if a proposed project meets the four factors in Minn. R. 4410.1700, subp. 7, for determining whether a project has the potential for significant environmental effects. As set forth in the EA/EAW and these responses to comments, and the administrative record for the EA/EAW, the preferred alternative does not have the potential for significant environmental effects.</p> <p>See also responses to comment IDs 41-42, 46-50 above.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>122</p>	<p>V. THE PROPOSED DEVELOPMENT SATISFIES THE GENERAL STANDARD AND ALL OF THE SPECIFIC FACTORS THAT MUST BE CONSIDERED TO ORDER AN EIS. Minn. Rule 4410.1700, Subp. 1 provides the general standard which the Responsible Government Unit (“RGU”) must apply to its decision on the need for an Environmental Impact Statement (EIS):</p> <p>“An EIS <b>shall</b> be ordered for projects that have the potential for significant environmental effects.” [Emphasis added.]</p> <p>See also: Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App.</p>	<p>Under MEPA, an EIS is only necessary if there is a potential for significant environmental effects and if a proposed project meets the four factors in Minn. R. 4410.1700, subp. 7, for determining whether a project has the potential for significant environmental effects. As set forth in the EA/EAW, these responses to comments, and the administrative record for the EA/EAW, the preferred alternative does not have the potential for significant environmental effects. See also Responses to Comment IDs 41-42, 46-50, and 121 above.</p>

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		<p>1995): “An EIS must be prepared for projects that have a ‘potential for significant environmental effects.’ ” [See also Pope County Mothers v. MPCA 594 N.W.2d 233, 236 (Minn. App. 1999).]</p> <p>In other words, the RGU has <b>no choice</b> other than to order an EIS if the standards are satisfied.</p>	
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>123</p>	<p>Minnesota Rule 4410.1700, Subp. 7, contains the four specific factors that must be considered in determining “whether a project has the potential for significant environmental effects.” [See: Iron Rangers For Responsible Ridge Action v. Iron Range Resources, Inc. 531 N.W.2d 874, 880 (Minn. App. 1995), review denied: “The EQB has identified four factors the RGU must evaluate in determining whether a project has potential for significant environmental effects.” See also: Pope County Mothers v. MPCA 594 N.W.2d 233, 236 (Minn. App. 1999) and MCEA v. MPCA 644 N.W. 2d 457, 462-463 (Minn. 2002).]</p> <p>[Note: The assessment of litigation risks is NOT one of the factors. See Prior Lake American v. Mader 642 N.W.2d 729, 739 (Minn. 2002).]</p> <p>As explained below, <b>all four of the factors, necessary to order an EIS for the proposed Lake Elmo Airport runway expansion, are satisfied.</b></p>	<p>See Response to Comment ID 122 above.</p>

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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	124	<p><b>“A. type, extent, and irreversibility of environmental effects.”</b>  As stated in the letter from Mr. Stuart Grubb, PG (Exhibit 1) and throughout this document, the type, extent, and irreversibility of environmental impacts are great. In brief, once habitat is changed it is very difficult and expensive to restore; once groundwater is polluted, it is expensive to clean up.</p>	See Response to Comment ID 122 above. See also Response to Mr. Stuart Grubb Comment IDs 148-168.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	125	<p><b>“B. cumulative potential effects of related or anticipated future projects.”</b>  As stated in the letter from Mr. Stuart Grubb, PG (Exhibit 1), and throughout this document, the proposed runway projects and Metropolitan Council advocacy for connected sewer and water are “connected actions.” They have the potential for significant environmental effects and should be part of the EIS.</p>	<p>“Cumulative potential effects” and “connected actions” are different concepts. “Cumulative potential effects” are environmental effects resulting from the incremental effects of a project in addition to other projects in the environmentally relevant area that might reasonably be expected to affect the same environmental resources, including future projects actually planned. Minn. R. 4410.0200, subp. 11a. “Connected actions” occur when one project would directly induce another, one project is a prerequisite for another and the prerequisite project is not justified by itself, or neither project is justified by itself. Minn. R. 4410.0200, subp. 9c. The EA/EAW properly evaluates all cumulative potential effects and connected actions, and concludes an EIS is not needed.</p> <p>The Metropolitan Council’s request for the installation of sanitary sewer and watermain connections at MAC reliever airports is not a “connected action” with the proposed project. The Metropolitan Council’s request for sewer and water connections at MAC reliever airports was a 1998 request that applied to all six</p>

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			<p>MAC general aviation airports, not just Lake Elmo Airport. In addition, the request came well before MAC planned the proposed Lake Elmo Airport runway project that the EA/EAW discusses. The Metropolitan Council request for a sewer connection at Lake Elmo Airport did not induce the proposed runway project and is not a prerequisite to the runway project. Both the request for sewer connections and the runway project are justified independently.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>126</p>	<p><b>“C. the extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority.”</b>  Minn. Rule 4410.0200, Subp. 51, defines “mitigation” as:  “A. avoiding impacts altogether by not undertaking a certain project  B. minimizing impacts by limiting the degree of magnitude of a project;  C. rectifying impacts by repairing, rehabilitating, or restoring the affected environment;  D. reducing or eliminating impacts over time by preservation and maintenance operations during the life of the project;  E. compensating for impacts by replacing or providing substitute resources or environments; or  F. reducing or avoiding impacts by implementation of pollution prevention measures.”</p> <p>“‘Mitigation’ includes avoiding or limiting the size of a project, repairing or restoring the</p>	<p>The EQB rule does not require mitigation, but establishes the extent of mitigation as a factor in determining whether a project has a potential for significant environmental effects and requires preparation of an EIS. The EA/EAW discusses impacts of the proposed project on water resources and concludes that there are no significant impacts. See Response to Comment IDs 23, 151, 152, 156, 160, 162, and 164.</p> <p>Discussion of mitigation in the EA/EAW goes well beyond the “merely vague statements of good intentions” test. The EA/EAW discusses specific mitigation measures, which are summarized in EA/EAW Table 5-6.</p> <p>The EA/EAW gathers and analyzes relevant facts necessary to make a reasoned determination regarding whether the proposed project has the potential for significant environmental effects. As set forth in the EA/EAW, these responses to comments, and the administrative record for the EA/EAW, the</p>



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		<p>environment, working to preserve or maintain the environment during the life of the project, or replacing or substituting resources. Minn. Rule 4410.0200, subp. 51.” [Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995).]</p> <p>The EA/EAW has not demonstrated that provisions of the Valley Branch Watershed District or other permit processes can sufficiently mitigate the potentially irreversible impacts of the development on water resources, for example. In fact, regulatory authority is inadequate. [See letter from Mr. Stuart Grubb, PG, attached as <b>Exhibit 1.</b>]</p> <p>In summary, the EA/EAW’s statements regarding mitigation of the adverse impacts to the significant water and other natural resources are “<b>merely vague statements of good intentions</b>” and, therefore, are not adequate mitigation efforts. See National Audubon Society v. MPCA 569 N.W. 2d 211, 217, quoting Iron Rangers, 531 N.W.2d at 881, which quotes from Audubon Society v. Dailey 977 F2d 428, 436 (8<sup>th</sup> Cir. 1992).</p> <p>Most importantly, adequate mitigation (through <u>any</u> permit process) can only be accomplished after ALL OF THE FACTS are been gathered. An EIS is the best way to gather the facts.</p>	<p>preferred alternative does not have the potential for significant environmental effects. See also Responses to Comment IDs 41-42, 46-50, and 121-124 above.</p>

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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	127	<p><b>“D. the extent to which the environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.”</b></p> <p>No other environmental studies on the environmental impacts of the proposed project presently exist or are currently planned by a public agency or the developer.</p>	Comment noted. The EA/EAW does not rely upon a discussion of other available environmental studies regarding environmental effects.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	128	<p>VI. INSUFFICIENT INFORMATION DOES NOT ALLEVIATE THE NEED FOR AN EIS.</p> <p>As described in this memo and the attached exhibits, the EAW does <u>not</u> accurately and completely address certain environmental impacts. However, as stated above, the RGU has only two choices if there is insufficient information: (1) make a positive declaration for an EIS and include the lacking information as part of the EIS scope; or (2) postpone the decision on the need for an EIS up to 30 days to obtain the lacking information. [See Minnesota Rule 4410.1700, Subpart 2a.]</p> <p>In fact, MAC has only 30+ days to gather additional information before it is required to make an EIS determination. This is not enough time to gather appropriate information. [See requirements of Stuart Grubb, PG, attached as <b>Exhibit 1.</b>]</p> <p>In addition, the EA/EAW is incomplete without stating the best date and methodology to</p>	<p>See Response to Comment ID 46, noting that Minn. R. 4410.1000, subp. 3, does not apply. In addition, the deadlines in the EQB rules, such as the 30-day reference in Minn. R. 4410.1000, subp. 3, are directory only.</p> <p>FAA conducted Section 7 consultation with the USFWS for the RPBB, and the USFWS concurrence with the FAA finding of “may affect but is not likely to adversely affect” for this species sufficiently establishes that adverse impacts to this species or its habitats should not be expected according to FAA Order 1050.1F, Exhibit 4-1. The area is not conducive to pollinator-dependent species due to lack of suitable vegetation and management practices that limit availability of forage for the RPBB. The USFWS does not require surveys for bees in areas outside of high potential zones. The Airport is not in a high potential zone for the RPBB, and therefore the MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as inadequate and incomplete. Additionally, areas near wetlands with pollen and nectar producing forbs are currently mowed multiple</p>

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		<p><u>adequately</u> survey for the rusty patched bumble bees (RPBB), the first bee in the continental United States to be listed as “endangered” under the federal Endangered Species Act. Certainly, an adequate survey for RPBB cannot occur within the next 30 days - should be no earlier than mid-summer for areas directly or indirectly impacted by this project. Thus, an EIS is the only option.</p> <p>Nevertheless, this letter, the attached exhibits, and the record in general provide sufficient legal and factual basis to require an EIS <u>without gathering any more information beforehand.</u></p>	<p>times during a growing season and do not provide RPBB habitat.</p>
<p>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>	<p>129</p>	<p>A. ECONOMIC IMPACTS CAN ALSO BE STUDIED.</p> <p>The wisdom of ordering an EIS is not just to clearly determine the nature and extent of the environmental impacts of the proposed project. Minnesota Statute 116D.04, Subd. 2a, states in part,</p> <p>“The environmental impact statement ... discusses appropriate alternatives to the proposed action and their impacts, and explores methods by which adverse environmental impacts of an action could be mitigated. The environmental impact statement shall also analyze those <b>economic, employment</b> and sociological effects that cannot be avoided should the action be implemented.” (Emphasis added.)</p>	<p>The EA/EAW discusses socioeconomic impacts in Section 5.12. Because it satisfies both NEPA and MEPA, the EA/EAW discusses alternatives, including a no-action alternative, in Chapter 3. MEPA does not require a discussion of alternatives in an EAW, but NEPA requires an alternatives analysis in an EA. See also Responses to Comment IDs 41-42, 46-50, and 121-126 above.</p>

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		<p>Minn. Rule 4410.2300 elaborates on the EIS requirements. Paragraph G requires an analysis of alternatives to the proposed project, <u>including no action</u>. Paragraph H requires a “thorough, but succinct discussion” of sociological and economic impacts.</p> <p>The economic and environmental impacts of the proposed runway expansion on the citizens of West Lakeland Township are of great concern to the West Lakeland Township Board of Supervisors. Attached <b>Exhibit 3</b> states the total estimated market value of the 348 parcels, within 1 mile of the airport, is \$93,997,000 million. Attached <b>Exhibit 3A</b> states the total estimated market value of the 2,103 parcels, within 2 miles of the airport, is \$823,642,900. These economic impacts on these properties cannot be overlooked – and must be part of an EIS.</p>	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	130	<p>B. IT IS MORE DIFFICULT TO OBTAIN INFORMATION DURING THE PERMIT PROCESS.</p> <p>The regulations governing permits needed from other government units may not have the same ability to obtain the necessary information than an EIS.</p>	<p>The purpose of environmental review under NEPA and MEPA is to provide information to governmental agencies before a project is commenced and before permits are issued. Environmental review differs from permit issuance. Governmental units may base permitting decisions for the proposed Lake Elmo Airport project upon information in the EA/EAW. They may also request permit applications or other submissions of information specific to certain permits or approvals after the EA/EAW is complete. An EIS is not necessary unless a project has a potential for significant environmental effects. As set forth in the</p>

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			EA/EAW, these responses to comments, and the administrative record for the EA/EAW, the preferred alternative does not have the potential for significant environmental effects. See also Responses to Comment IDs 41-42, 46-50, and 121-124 above.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	131	C. WEST LAKE LAND TOWNSHIP'S "PREFERRED ALTERNATIVE" WOULD BE STUDIED. Missing from the EA/EAW is West Lakeland Township's preferred alternative, which is: (1) repair and repaving both runways and taxiways in their existing footprint, thus allowing existing aircraft to continue to safely use Lake Elmo Airport; (2) mitigate incompatible land uses by proper zoning, promulgated through the JAZB, and by purchasing property to remove hazards; and (3) upgrade the instrument approach procedures. Minnesota Rule 4410.2300.G. requires discussion of "reasonable alternatives." This is a reasonable alternative.	An EAW under MEPA does not require an alternatives analysis. Under NEPA, an EA requires an evaluation of reasonable alternatives. An alternative that does not meet all of the purposes and needs of the project is not reasonable and need not be evaluated. <i>City of Richfield v. FAA</i> , 152 F.3d 905, 907 (8th Cir. 1998).  West Lakeland Township's alternative does not meet the purpose and need of proposed project because 1) it does not minimize incompatible land uses in the RPZs, and 2) it does not meet runway length needs for users. Therefore, the Township's alternative is not reasonable under NEPA.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	132	The Minnesota Supreme Court stated, in <i>Minnesota Public Interest Research Group v. Minnesota Environmental Quality Council</i> 237 N.W. 2d 379, 381 (Minn. 1975), "Where, as here, there is understandable evidence of public demand for an environmental review in this important and sensitive field, we conclude that a hearing is required to fulfill the purposes of chapter 116D." Although this case involved a statute, since repealed, that allowed for a citizens	Under MEPA, a public hearing is discretionary and may be held by the RGU "to gather comments on the EAW [during the public comment period] if [the RGU] determines that a meeting is necessary or useful." Minn. R. 4410.1600. A discretionary MEPA public hearing is designed to gather public comments, not to present evidence or engage in a debate regarding a proposed project.  MAC held a public hearing on the Draft EA/EAW during the public comment period for the purpose of

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		<p>petition for an EIS, the principles are the same. The public hearing that was conducted on April 4, 2018 <b>failed its primary purpose</b>. Answers were not provided by MAC and the citizens were lead to believe that the environmental impacts were negligible: There was no discussion that the purpose of the process and that the comments should be directed towards the inadequacy of the EAEAW, whether or not there is a “potential for significant environmental effects”, and whether or not an EIS should be ordered.</p>	<p>gathering public comments. Notices for the public hearing explained the purpose was to receive public testimony on the Draft EA/EAW. At the public hearing during the public comment period, MAC staff and MAC’s consultant explained the conclusion in the Draft EA/EAW that the proposed project does not have the potential for significant environmental effects. It is appropriate for MAC staff and MAC’s consultant to explain the conclusion of the Draft EA/EAW on which MAC was taking public comment. But the decision as to whether to prepare an EIS rests with the MAC Commission and will be based on the entire administrative record, including all comments received on the EA/EAW. It was explained both verbally during the presentation preceding the hearing and printed on the presentation slide handouts that spoken testimony received during the hearing would be recorded and responded to in written form and included in the appendix of the EA/EAW. It was also made clear during the preamble to the public hearing that the hearing officers would not be answering questions nor taking action, rather the purpose of the hearing was to collect verbal and written comments and take them into consideration before taking final action on the EA/EAW at a future date.</p> <p>The notice of the public hearing met the requirements of Minn. R. 4410.1500. There is no requirement that the notice explain the purpose of the process or the focus of public comments.</p>



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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	133	It is known that the MAC will be asking for additional information after the public comment period closes. This presents an unfair advantage unless “procedural due process” is ensured.	MAC will not request additional public comment after the public comment period closes. Any additional information MAC has developed after the close of the public comment period was developed for the purpose of responding to comments and is included in these responses to public comments. The information will also be part of the administrative record for the EA/EAW.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	134	To ensure “procedural due process,” my client, West Lakeland Township, requests a copy of all documents and correspondence (including electronic) generated by or received by the MAC <u>after</u> the close of the public period. In addition, West Lakeland Township requests an adequate opportunity to rebut any new information provided and to provide comments to the MAC <u>before</u> the EIS decision is made.	See Response to Comment ID 133 above. All parties will have an opportunity to make additional comments at the public meeting when the MAC Commission considers the adequacy of the EA/EAW and whether to prepare an EIS on the Lake Elmo Airport runway project. Any requests for information should be submitted using the appropriate process under the Freedom of Information Act (FOIA) and the Minnesota Government Data Practices Act.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	135	IX. EXTENT OF THE RECORD TO BE REVIEWED BY THE RGU. The RGU’s decision on the need for an EIS must be based on the environmental assessment worksheet, the comments received during the comment period, and relevant documents available to and in the possession of the RGU. All of these are part of the public record to be reviewed by the RGU prior to its decision. See Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 907-908 (Minn. App. 1995); and National Audubon Society v. MPCA 569 N.W. 2d 211, 216 (Minn. App. 1997).	Comment noted. See also Response to Comment IDs 133 and 134 above.

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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	136	<p>X. BIAS.</p> <p>The chart on the last page of the EA/EAW, Appendix J, explains the next steps in the environmental review process. However, nowhere is it mentioned an Environmental Impact Statement (EIS) is even a possibility. Furthermore, the public hearing, conducted on April 4, 2018, provided no information – oral or written – that an Environmental Impact Statement is even a possibility. In fact, a MAC representative (employed Mead &amp; Hunt) stated there were <u>no</u> significant environmental effects, insinuating that a “no need” determination is fait accompli.</p> <p>This is unacceptable. West Lakeland Township demands that another public hearing be conducted – and that MAC hire another contractor to provide an <u>objective</u> analysis of the potential for significant environmental effects, based on its own investigation <u>and</u> based on comments received during the process.</p>	<p>The EA/EAW chart sets forth the NEPA and MEPA procedures through the decision of FAA and MAC on the need for an EIS. The chart does not presume FAA will issue a finding of no significant impact or MAC will issue a negative declaration on the need for an EIS.</p> <p>Under MEPA, a public hearing is discretionary and may be held by the RGU “to gather comments on the EAW [during the public comment period] if [the RGU] determines that a meeting is necessary or useful.” Minn. R. 4410.1600. MAC held a public hearing on the Draft EA/EAW during the public comment period for the purpose of gathering public comments. At the public hearing, MAC staff and MAC’s consultant explained the conclusion in the Draft EA/EAW that the proposed project does not have the potential for significant environmental effects. But the decision as to whether to prepare an EIS rests with the MAC Commission and will be based on the entire administrative record, including all comments received. There is no “fait accompli” regarding the determination on the need for an EIS and no bias is evidenced by MAC’s consultant explaining the conclusion of the Draft EA/EAW on which MAC was taking public comment.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf	137	<p>XI. CONFLICT OF INTEREST.</p> <p>Although the West Lakeland Township Board of Supervisors works hard to build public confidence in township governance, public trust in government, in general, is probably at an all-time</p>	<p>For many types of projects, particularly transportation projects, it is common for the same governmental unit to be the project proposer and the Responsible Governmental Unit (RGU) that prepares environmental review documents under MEPA</p>

Commenter	ID	Subject	Response
of West Lakeland Township)		<p>low. Citizens' comments made during the April 4, 2018 public hearing support this view. Nevertheless, the project proposer, MAC, decided to adopt the role of "responsible government unit" (RGU) to prepare the EA/EAW, even though the rules of the Minnesota Environmental Quality Board allow another entity. It is an obvious conflict of interest that the project proposer is the <b>same entity</b> as the entity that decides whether or not to order an Environmental Impact Statement (EIS). Specifically, Minnesota Rule 4410.4300, Subpart 21 states:</p> <p>"Airport projects. ... A. For construction of a paved, new airport runway, the DOT, local governmental unit, or the Metropolitan Airports Commission shall be the RGU ...</p>	<p>analyzing the project. The EQB rules provide, for example, that the RGU for highway projects may be either the Minnesota Department of Transportation or the local governmental unit. Minn. R. 4410.4300, subp. 22.</p> <p>There is no question that under Minn. R. 4410.4300, subp. 21, MAC is the appropriate RGU for the Lake Elmo Airport runway project. But for any project where "the RGU is in question," the EQB rules provide that when "a single governmental unit proposes to carry out or has sole jurisdiction to approve the project, it shall be the RGU." Minn. R. 4410.0500, subp. 5. MAC is the single governmental unit proposing to carry out the Lake Elmo Airport runway project. So if there were a question regarding the appropriate RGU, the RGU would be MAC under the EQB's rule for selecting RGUs. MAC is following the EQB rules by acting as the RGU for the Lake Elmo Airport runway project.</p>
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	138	Furthermore, Mike Madigan, MAC Commissioner representing the Lake Elmo area, and former MAC Executive Director and CEO, Jeff Hamiel, are pilots who use Lake Elmo Airport.	There is no evidence that use of the Lake Elmo Airport by a MAC Commissioner or by MAC's former Executive Director constitutes a conflict of interest.
Mr. Thomas E. Casey, Attorney at Law, Letter	139	To avoid the appearance of impropriety, MAC should agree that the Minnesota Department of	See Response to Comment ID 137 above.

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dated April 17, 2018 (on behalf of West Lakeland Township)		Transportation is the “RGU”, who would then decide whether or not to order an EIS.	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	140	XII. EMMONS AND OLIVIER MEMO The West Lakeland Township Board of Supervisors incorporates by reference, as part of its comments to the draft EA/EAW, the letter from Mr. Stuart Grubb, PG, Emmons and Olivier Resources, attached as <b>Exhibit 1</b> . Mr. Grubb specifically states, due to the significant environmental impacts, an Environmental Impact Statement should be ordered.	See responses to Mr. Stuart Grubb Comment IDs 148-168 below.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	141	XIII. FOCUS ENGINEERING MEMO West Lakeland Township Board of Supervisors also incorporates by reference, as part of its comments to the draft EA/EAW, the letter from Mr. Ryan Stempski, P.E., of Focus Engineering, attached as <b>Exhibit 4</b> . Mr. Stempski specifically challenges 30 <sup>th</sup> Street North re-alignment assumptions and raises other significant environmental issues, all of which can be most properly addressed in an Environmental Impact Statement (EIS).	See responses to Mr. Ryan Stempski Comment IDs 169-175 below.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West	142	XIV. CONNECTED ACTION – SEWAGE AND WATER A letter dated November 16, 1998, from the Metropolitan Council to the Metropolitan Airports Commission states in part, “The MAC has budgeted money at all reliever airport	Lake Elmo Airport currently lies outside of the Metropolitan Urban Services Area (MUSA). However, the Metropolitan Council Environmental Services (MCES) agency has requested that the MAC provide sanitary sewer and water services for all of the hangar areas in the airport reliever system, including Lake Elmo Airport. This request was

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Lakeland Township)		<p>facilities for sanitary sewer and watermain installation. They money has been budget for several years now <b>with no apparent actions</b>. Council staff are concerned that this action is never going to occur. Council staff are highly supportive of the need to hookup the reliever airports ... to the metropolitan disposal system.” (See attached <b>Exhibit 5</b>.)</p> <p>The EA/EAW is incomplete without a discussion of whether or not a sanitary sewer and watermain installation is being planned. If planned, then it is a connected action that should be included in the current environmental review process.</p>	<p>primarily related to concerns about the possibility of noncompliant well and septic systems that may be in existence at the airports.</p> <p>Subsequent to the MCES request, the MAC adopted a Sanitary Sewer and Water Policy in 1998. The policy required all noncompliant wells be closed out in accordance with timelines related to each individual airport. Compliant well and septic systems are allowed to remain until sanitary sewer and water services are made available. A tenant with a compliant system is required to close it out and connect to the sanitary sewer and water within two years of the sewer and water installation/availability.</p> <p>Lake Elmo Airport has no sanitary sewer and water services available. However, residential development has occurred on adjoining properties to the west of the Airport that are within the MUSA. Sanitary sewer and water services have been extended to this new residential development area. Therefore, the opportunity for connection to their system may arise in the future.</p> <p>Sanitary sewer and water connections to a Lake Elmo system may require agreements with the City of Lake Elmo and Baytown Township, communities which may or may not support the proposed installation. The MAC will continue to study the costs, benefits and feasibility of serving the Airport with sanitary sewer and water. The steps for installation of sanitary sewer and water facilities to specified</p>

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			portions of the hangar areas at Lake Elmo Airport will be considered when a MUSA, and related agreements and access, are available.
AMr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	143	<p>XV. WEST LAKELAND TOWNSHIP'S PREFERRED ALTERNATIVE – OMITTED.</p> <p>As stated in section VII above, West Lakeland Township's preferred alternative is missing, which is: (1) repair and repave both runways and taxiways in their existing footprint, thus allowing existing aircraft to continue to safely use Lake Elmo Airport; (2) mitigate incompatible land uses by proper zoning, promulgated through the JAZB, and by purchasing property to remove hazards; and (3) upgrade the instrument approach procedures. Minnesota Rule 4410.2300.G. requires discussion of "reasonable alternatives" in an EIS.</p> <p>The EA/EAW, page 3-1, references FAA Order 5050 4B, which pertains to National Environmental Policy Act (NEPA). MAC's interpretation of this order results in the failure to adequately examine West Lakeland Township's preferred alternative, a reasonable alternative to the proposed project.</p> <p>Thus, an Environmental Impact Statement should be ordered to allow the examination of West Lakeland Township's preferred alternative pursuant to the Minnesota Environmental Policy</p>	See Response to Comment ID 131 above.



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		Act or "MEPA" (Minnesota Statute 116B and Minnesota Rules, Chapter 4410).	
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	144	In summary, the draft EA/EAW is an unpersuasive and biased attempt to provide safety and economic justification to unnecessarily expand the Lake Elmo Airport. Contrary to law and responsible public policy, the draft EA/EAW fails to locate and analyze environmentally superior sites. It leaves many questions unanswered that must be included in the final EIS.	As set forth in the EA/EAW, these responses to comments, and the administrative record for the EA/EAW, the preferred alternative does not have the potential for significant environmental effects.
Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)	145	<p>As stated in Section II.B. above, "The very purpose of an EIS ... is to determine the potential for significant environmental effects <b>before they occur. By deferring this issue to later permitting and monitoring decisions, the [RGU] abandoned [its] duty</b> to require an EIS where there exists a potential for significant environmental effects." (Emphasis added.) See Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995). See also Pope County Mothers v. MPCA 594 N.W.2d 233, 237-238 (Minn. App. 1999).</p> <p>In other words, legally, the MAC - and other permit authorities - must "GET THE FACTS" <u>before</u> MAC can decide what to do. The information contained in the EAW is inadequate to support a conclusion that there will be no "... potential for significant environmental effects." An EIS is the best way to "GET THE FACTS."</p>	As set forth in the EA/EAW, these responses to comments, and the administrative record for the EA/EAW, the preferred alternative does not have the potential for significant environmental effects. MAC has also prepared the EA/EAW before the project has commenced and before any environmental effects from the project have occurred. See also Responses to Comment IDs 41-42, 46-50, 121-126, and 130 above.
Mr. Thomas E. Casey, Attorney	146	Therefore, the West Lakeland Township Board of Supervisors respectfully requests that	Comment noted. The EA/EAW adequately and completely addresses the issues identified by this

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<p>at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</p>		<p>the an EIS be ordered, which will contain a thorough analysis of the issues raised in this letter, and by other commenters, including but not limited to: (1) alternative sites that are environmentally superior sites; (2) cost comparison of alternatives, confirmed by an <u>independent consultant</u>; (3) the economic impacts of the Lake Elmo Airport, when guided and rezoned by the Joint Airport Zoning Board; (4) source reduction and beneficial use options to reduce or alleviate the demand for a runway anti/de-icers and salt; (6) surface and groundwater impacts and remediation options; and (7) a thorough on-site survey for the existence of the federally endangered rusty-patched bumble bee.</p> <p>To paraphrase Aldo Leopold, an environmental dispute arises "... from which the sharpest pen gains much glory, but the [resource] gains nothing but a chance to disappear. " (Curt Meine, Aldo Leopold: His Life and Work. Madison: University of Wisconsin Press, 1988. Page 289.) Let not the sharpest pen supplant the necessity for making sound decisions, based on the best information available. A thoroughly researched EIS will help all parties make the best decision possible.</p> <p>On behalf of the West Lakeland Township Board of Supervisors, I thank you in advance for your decision to order an Environmental Impact Statement (EIS).</p>	<p>comment, as noted in responses to previous Comment IDs 39-145.</p>

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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 18, 2018 (on behalf of West Lakeland Township)	147	<p>The EA/EAW, page 3-9 (figure 3-3), is a map containing the preferred alternative runway design. The green area in figure 3-3 is the new pavement to be added to the airfield, which consists of: (1) the new 3,500' (14/32) runway, to be relocated 615' east of the current 14/32 main runway; (2) a new full length taxiway, to be located north and east of that new 3,500' (14/32) runway; and (3) a taxiway, to be located south and east of crosswind runway (04/22), connecting the new full length taxiway for runway 14/32 and the old runway 14/32 taxiway.</p> <p>Unfortunately, the following changes to the present runway and taxiway design increases the risk of collision. (These are euphemistically referred to as incursion areas or "hot spots.") The new incursion areas or "hot spots" are:</p> <ol style="list-style-type: none"> <li>1. The new 3,500' (14/32) runway will cross runway 04/22 approximately 600 feet east of the existing 14/32 runway, splitting the 14/32 runway into thirds. The existing 14/32 runway was more safely placed near the end of the crosswind runway (04/22).</li> <li>2. The new pavement connecting the new full length runway 14/32 taxiway and the old runway 14/32 taxiway together.</li> <li>3. The full length taxiway for the crosswind (04/22) runway crosses the new 14/32 runway approximately 700 feet from the northwest end of runway 14/32.</li> </ol>	<p>The airfield configuration represented by the proposed action was developed in accordance with applicable FAA design guidance contained in Advisory Circular 150/5300-13A, Change 1, <i>Airport Design</i>. The proposed configuration is designed to enable safe and efficient taxiing and does not create any complex runway/taxiway intersections as defined by this guidance. FAA-standard markings, signage, and lighting will be properly placed at all intersections to increase pilot situational awareness.</p> <p>The following responds to assertions regarding each change in the airfield layout identified by this comment.</p> <ol style="list-style-type: none"> <li>1. The new runway intersection location will not increase the risk of collision or runway incursions, as it simply replaces the existing intersection. The new intersection location reduces potential for a "high energy" collision because it moves the intersection out of the middle third of Runway 14/32.</li> <li>2. The new connector taxiway between the existing parallel taxiway for Runway 14/32 and the future parallel taxiway (converted Runway 14/32) does not introduce any new runway crossings. It is a simple four-way taxiway intersection with a near 90-degree angle, which promotes pilot situational awareness and visibility. There are no risk factors associated with its design that would increase the risk of collision or runway incursion.</li> </ol>

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		<p>4. The new full length taxiway for runway 14/32 crosses the middle of the crosswind runway (04/22).</p> <p>The Metropolitan Airport Commission states in the Crystal Airport 2035 Long Term Comprehensive Plan (adopted October, 2017):</p> <p>1. “A key objective for airfield improvements at Crystal Airport is to <b>simplify the airfield geometry</b> by <b>reducing</b> the number of designated “<b>hot spots</b>” on the airfield, which represent the areas with the <b>greatest potential</b> for pilot confusion and <b>incursion errors</b>. This is consistent with a nationwide initiative by the Federal Aviation Administration (FAA) to reduce the number of runway incursions and increase airfield safety. [Emphasis added.] (Page ii.)</p> <p>2. “Airfield Geometry. Improving runway safety continues to be one of the FAA’s highest priorities, and the agency is working with airport sponsors to further reduce runway risks through risk-based decision making. <b>Risk factors</b> that contribute to runway incursions may include unclear taxiway markings, airport signage, and more complex issues such as the <b>runway or taxiway layout</b>.” [Emphasis added.] Runway incursions occur when an aircraft, vehicle, or person enters the protected area of an airport designated for aircraft landings and take offs.” [Emphasis added.] (Page 2-11.)</p> <p>In summary, the preferred alternative runway and taxiway design contains more intersections – and more dangerous intersections - of runways and</p>	<p>3. The intersection of the existing parallel taxiway for Runway 04/22 with the new Runway 14/32 will not increase the risk of collision or runway incursions. The new intersection location reduces the likelihood of a “high energy” collision because it moves the intersection out of the middle third of Runway 14/32. The new intersection replaces the current intersection, and therefore does not introduce any new runway crossings. It is a simple four-way runway/taxiway intersection with a near 90-degree angle, which promotes pilot situational awareness and visibility. The location of the new intersection is safer and more efficient than the existing intersection, as it allows aircraft to hold prior to crossing Runway 14/32 without blocking aircraft taxiing to or from the south end of the airfield, which currently occurs with the existing layout.</p> <p>4. Although the new parallel taxiway for Runway 14/32 will cross the middle third of Runway 04/22, there are no risk factors associated with its design that would increase the risk of collision or runway incursion. This taxiway is intended to <b>reduce</b> the risk of runway incursions, as it reduces the number of runways an aircraft has to cross to move between the Runway 32 end and the north hangar area. With the existing layout, aircraft currently have to cross both runways to make a trip between these locations.</p>

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		<p>taxiways, known as “incursion areas.” This design is not safe and needs to be addressed. The EA/EAW is incomplete unless it provides adequate documentation that these additional incursion areas completely satisfy all safety regulations and policies. West Lakeland Township respectfully requests, pursuant to the Minnesota Government Data Practices Act, that MAC provide a copy of the legal authority, if any, supporting MAC’s conclusion.</p>	<p>The location and design of each intersection for the preferred alternative was carefully considered to minimize risk, enhance safety, and improve efficiency. None of these intersections increase the risk of collision or runway incursion when compared to the existing condition.</p> <p>As to a request under the Minnesota Government Data Practices Act for MAC’s “legal authority” supporting conclusions drawn in the EA/EAW, the appropriate method for making a request for data under the Minnesota Government Data Practices Act is not to make such a request in comments on an environmental review document prepared under NEPA and MEPA, such as the Draft EA/EAW. Rather, the appropriate method for making a request is to do so under the Minnesota Government Data Practices Act by directing the request to the MAC’s responsible authority under the Act.</p> <p>The “legal authority” supporting FAA and MAC conclusions drawn from the information presented in the EA/EAW is NEPA, the Council on Environmental Quality’s rules implementing NEPA, FAA orders implementing NEPA, MEPA, and the Minnesota Environmental Quality Board’s rules implementing MEPA.</p>
Mr. Stuart Grubb, PG, Emmons and Olivier	148	<p>1. Floodplain Impacts Section 4.5.7 of the draft EAW includes mention of the floodplain and FEMA Special Flood Hazard Area (SFHA) mapping in Figure 4-9. The</p>	<p>Comment noted. As noted in EA/EAW Section 5.14.3, “the watershed district permit will be acquired by the MAC prior to construction and will fulfill permitting requirements related to floodplains.” No coordination</p>

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Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)		<p>preferred alternative area of ground disturbance south of 30th Street North is within a SFHA Zone A which demarks the area subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies. Because detailed hydraulic analyses have not been performed, no Base Flood Elevation (BFE) or flood depth is regulated. Mandatory flood insurance purchase requirements and floodplain management standards apply in these areas. Per FEMA regulations, to ensure that proposed development projects meet the requirements of the NFIP and the community's floodplain management ordinance, a permit is required before construction or development begins within any SFHA. In areas designated as Zone A without BFEs provided by FEMA, such as this project area, communities must apply the provisions of Paragraph 60.3(b) of the Title 44 of the Code of Federal Regulations (CFR).</p>	<p>or permits will be required from FEMA for this project, as FEMA delegates floodplain management authority to local jurisdictions.</p> <p>Washington County participates in the National Flood Insurance Program (NFIP) and maintains a floodplain ordinance that regulates flood hazard areas within those unincorporated areas that are subject to periodic inundation. This floodplain ordinance is enforced through the building permit process, and enforcement consists primarily of verifying that the project meets watershed district rules and regulations, and fulfills the requirements of the NFIP. The County does not typically require a building permit for a public road.</p> <p>According to the latest MDNR listing dated August 16, 2017, West Lakeland Township does not participate in the NFIP. See <a href="https://files.dnr.state.mn.us/waters/watermgmt_section/floodplain/nfip-status.pdf">https://files.dnr.state.mn.us/waters/watermgmt_section/floodplain/nfip-status.pdf</a>.</p> <p>However, Section 9.14 of the Township Code does require that "Land alteration in floodplains shall also be in accordance with floodplain regulations." Because the Township does not have its own specific floodplain regulations, the watershed district rules and regulations are the applicable local floodplain regulations for this project.</p> <p>Prior to construction activity in the floodplain, a 100-year flood elevation will be established around all</p>



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			wetlands and/or lakes affected by the proposed project. All transportation facilities will be constructed in accordance with floodplain management standards.
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)	149	Report Section 5.14.3 proceeds to acknowledge Executive Order 11988 which requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.	Comment noted. All of the 30 <sup>th</sup> Street Realignment Alternatives considered in EA/EAW Chapter 3 would have a similar floodplain impact, and there is no viable realignment alternative that avoids impact to floodplains.
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)	150	Local review will be necessary by the Valley Branch Watershed District (VBWD) requiring demonstration that the fill volume will be limited so that the cumulative effect of all possible filling will not raise the 100-year flood level more than 0.1 foot. The floodplain adjacent to existing waters is to be preserved by dedication and/or perpetual easement to the VBWD.	Comment noted. The 100-year flood level is not expected to rise by more than 0.1 foot as a result of the realignment of 30 <sup>th</sup> Street North.  See response to VBWD Comment ID 23, above.
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of	151	Section 5.14.3 of the draft report associates floodplain filling with the wetland fill footprint of 0.06 acre, deeming that “the estimated net loss of floodplain storage is insignificant when considering the flood volumes associated with a 100-year event, and there would be no notable adverse impacts on natural and beneficial floodplain values, as defined by DOT Order	Comment noted. See response to VBWD Comment ID 23, above. The affected floodplain is a flood fringe area and is not frequently inundated, therefore the primary natural and beneficial value associated with the affected floodplain is flood storage. Based on preliminary design profiles for the realigned segment of 30 <sup>th</sup> Street North, approximately 1,120 cubic yards (CY) of earthen fill would be placed within the

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West Lakeland Township)		5650.2, Floodplain Management and Protection, associated with preferred alternative.” Per DOT Order 5650.2, draft environmental review documents shall include sufficient discussion to permit an initial review of the adequacy of methods proposed to minimize harm, and, where practicable, to restore and preserve the natural and beneficial floodplain values affected.	floodplain boundary mapped by VBWD and below the 1%-Annual-Chance Flood Elevation estimated by VBWD. The estimated existing flood storage volume of the West Lakeland Township Ponds, using 919.2 feet as the 100-year flood elevation, is 286,650 CY. Based on comparison of the 1,120 CY fill volume to the existing 286,650 CY existing flood storage volume, the 100-year flood level is not expected to rise by more than 0.1 foot as a result of the realignment of 30 <sup>th</sup> Street North.
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)	152	As shown in Figure 1, superimposing the Digital Flood Insurance Rate Mapped Zone A over Figure 5-4: Preferred Alternative Wetland Impacts shows the footprint of floodplain impact to be much greater than only the wetland fill footprint. The meander of 30th Street North appears to involve approximately 590 linear feet of floodplain filling. At the existing street width of 26 feet, this alternative will involve a minimum of 0.35 acres of floodplain impact. If the road is upgraded with wider shoulders, the impact would be even greater. Current road design standards call for a minimum of width of 28 feet for a rural design (See Table 1). Therefore, the full impact of this proposed floodplain filling has not been reviewed for the preferred alternative. This oversight will cause significant environmental effects.	<p>Comment noted. The referenced Zone A is shown in EA/EAW Figure 4-9. Furthermore, EA/EAW Section 5.14.3 acknowledged that this flood hazard zone is within the preferred alternative area of ground disturbance and that this would result in net loss in floodplain storage. The floodplain fill footprint acreage does not provide enough information to make a conclusion regarding the potential loss of floodplain storage, which requires an analysis of floodplain fill volume below the 100-year floodplain elevation with respect to the existing available storage volume of the floodplain. Additional information regarding the estimated floodplain fill volume associated with the project has been added to Section 5.14.3 of the Final EA/EAW, as described in the response to VBWD Comment ID 23, above.</p> <p>A significant floodplain encroachment under DOT Order 5650.2 is defined as an encroachment resulting in one or more of the following construction or flood related impacts: (1) a considerable probability of loss of human life; (2) likely future damage associated with</p>

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			<p>the encroachment that could be substantial in cost or extent, including interruption of service on or loss of a vital transportation facility; and (3) a notable adverse impact on “natural and beneficial floodplain values.” None of these impacts will occur with the proposed action, and therefore the proposed floodplain fill does not represent a significant floodplain encroachment.</p>
<p>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</p>	<p>153</p>	<p>2. Stormwater Management According to the Valley Branch Watershed District (VBWD) Rule 2, all stormwater discharges must be in general conformance with the VBWD Plan and local watershed management plans. Specifically, stormwater and snowmelt runoff rates will be managed so that future peak rates of runoff crossing community boundaries and/or leaving a development are below or equal to existing rates and, stormwater volume will be controlled so that surface water and groundwater quantity and quality are protected.</p>	<p>Comment noted. See response to VBWD Comment ID 22, above. The project design will conform to VBWD rules and regulations, which are intended to protect surface water and groundwater quantity and quality.</p>
<p>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</p>	<p>154</p>	<p>As articulated in section 5.14.2 of the Draft EAW report, the preferred alternative will add 850,000 square feet of impervious surface, remove 300,000 square feet of impervious, and result in a net increase of 550,000 square feet of impervious surface. This amount exceeds the VBWD applicability threshold of 6,000. Per VBWD Rule 2.6.A, the post-construction runoff volume shall be retained on site for 1.1 inches of runoff from new and fully reconstructed impervious surfaces. The project team acknowledges this on page 1000 of the EAW appendices where it states “[T]he team is considering that very closely in the design of</p>	<p>Comment noted. See response to VBWD Comment ID 22, above.</p>

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		<p>this project. If the project can't meet that standard, the project won't be permitted. So, the MAC must meet that standard – there's really no way around it." No further information has been made available indicating how thoroughly the stormwater volume control has been considered. However, review of the volume that will be needed suggests it may be a costly undertaking.</p>	
<p>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</p>	<p>155</p>	<p>The 1.1 inch standard equates to a volume of 50,417 cubic feet that must be retained on the property for the new impervious surface. Conventional, surficial systems for stormwater retention and infiltration will not be feasible due to poor soils. VBWD Hydrologic Soil Group mapping shows that the soils in the area exhibit moderate/low infiltration (HSG C). A maximum ponding depth of 0.8 inches will be allowed to achieve the 48 hour drawdown period required by the MPCA NPDES Construction Stormwater Permit standards (VBWD Rule 2.6.E.iii). The required storage/infiltration feature would cover over 75,000 square feet of space on the airport property.</p> <p>Figure 5-5 (Airfield Drainage Map) of the Draft EAW shows "Proposed Infiltration Basin and Temporary Storage" basins located in various parts of the proposed airport. Two of the basins are located adjacent to wetlands. These basins are unlikely to infiltrate water adequately because soils near wetlands are frequently saturated and unable to infiltrate more water or convey water away from the infiltration basin.</p>	<p>Comment noted. See response to VBWD Comment ID 20, above.</p> <p>The USDA Natural Resources Conservation Service (NRCS) soils map for the Airport shows that the hydrologic soil group rating varies from A – D. If it is assumed that all the soils on site are in group C, the assumed infiltration rate as found on the MPCA's Minnesota Stormwater Manual website would be 0.2 inches per hour. In 48 hours, 9.6 inches (0.8 feet) of water infiltrate the soils on the site. The corresponding surface area needed to infiltrate 50,417 cubic feet of water in 48 hours is approximately 63,000 square feet.</p> <p>The EA/EAW assumes that the infiltration practices for water quality will consider several design elements such as soil type, elevation of groundwater, separation distances, and contributing area, which all have a bearing on the feasibility of using a specific water quality practice. An infiltration basin, for instance, would only be used for 50 acres or less and the contributing drainage areas have a maximum 5:1 ratio of impervious area to infiltrate area.</p>

Commenter	ID	Subject	Response
			<p>It should be noted that the MPCA NPDES permit does not have a requirement for a maximum ponding depth of 0.8 inches for the design of an infiltration basin. The infiltration practice must meet the required 48-hour drawdown time to allow for adequate maintenance without increasing compaction. Also, the FAA has a 48-hour drawdown requirement.</p> <p>Basin locations shown in Figure 5-5 are conceptual. The total combined surface area of these basin locations is approximately 150,000 square feet, well more than the commenter's estimate of required space for storage/infiltration features.</p> <p>To design any infiltration system, soil borings will need to be taken at the proposed infiltration practice location to determine if the proposed infiltration system is feasible. Geotechnical investigations will be conducted during design to determine infiltration capacity and final locations of stormwater basins will be identified at that time, and a properly designed infiltration system to accommodate a design volume based on the required water quality volume will be completed. If it is determined that soils have a low infiltration capacity (less than 0.06 inches per hour), the Minnesota Pollution Control Agency (MPCA) Construction General Permit will be followed which prohibits infiltration when an infiltration system will be constructed in areas of predominately low infiltration capacity soils. It may be possible for sites to partially or fully meet infiltration objectives if design</p>

Commenter	ID	Subject	Response
			<p>modification such as amending the soil are incorporated.</p> <p>See also response to Grubb Comment ID 160 below.</p>
<p>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</p>	<p>156</p>	<p>The EAW is inadequate because it presents a plan for stormwater management that will not meet watershed district standards and therefore will cause significant environmental effects.</p>	<p>See responses to VBWD Comment IDs 14-23 above.</p> <p>The design of the proposed project will conform to VBWD rules and regulations. The VBWD permit application for the project will show that the design is prepared by a registered professional engineer in the State of Minnesota and all submittals accompanying the permit application meets the rules and regulations. As shown in EAW Figure 5.5, there is ample space on MAC-owned property to construct the stormwater management infrastructure necessary to meet watershed district standards. The plan for stormwater management presented in the EAW is conceptual and there is no information that suggests that it cannot, if necessary, be modified during project design to conform to VBWD rules and regulations. Therefore the MAC disagrees with West Lakeland Township's characterization of the EA/EAW as inadequate.</p> <p>According to FAA Order 1050.1F, a significant impact to surface water exists if the action would:</p> <ol style="list-style-type: none"> <li>1. Exceed water quality standards established by Federal, state, local, and tribal regulatory agencies; or</li> <li>2. Contaminate public drinking water supply such that public health may be adversely affected.</li> </ol>



Commenter	ID	Subject	Response
			Neither of these impacts will occur with the proposed action, and therefore the conceptual stormwater management plan does not represent a significant impact.
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)	157	3. Wetland Management Standards Table 2 below shows VBWD Wetland Management Standards and Guidelines. Stormwater discharge to wetlands must meet standards that limit the amount of wetland bounce and period of inundation that range from maintaining the existing condition to allowing up to two feet of additional bounce for the 10-year, 24-hour event based on the management classification. Wetlands on the airport property are classified as either “Manage 1” or “Manage 2.” Meeting the VBWD Wetland Management Standards and Guidelines may require stormwater management above and beyond the 1.1-inch volume control requirement under VBWD Rule 2 due to the larger volume of runoff to be managed for these events. The EAW is deficient because it does not evaluate the wetland bounce created by the project, which is a significant environmental impact.	The final design of storm water management and snowmelt runoff rates will be managed so that storm water discharge to wetlands meet standards that limit the amount of wetland bounce. The standards set by the VBWD, which the MAC will follow, require that existing rates and storm water volume be controlled.
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018	158	4. Water Quality Impacts to Downs Lake The Lake Elmo Airport is in the Downs Lake Watershed, so surface water leaving the proposed runway areas will eventually flow to Downs Lake. Downs Lake is classified as a shallow lake by the Minnesota Pollution Control Agency (MPCA). Downs Lake is currently listed as impaired for	Comment noted. The impaired status of Downs Lake is noted in Section 4.5.4 of the EA/EAW.  See also response to Grubb Comment ID 160-162 below.

Commenter	ID	Subject	Response
(on behalf of West Lakeland Township)		aquatic recreation by the MPCA due to nutrients, eutrophication, and biological indicators, and is included in the MPCA's 303(d) impaired waters list because of excessive nutrients. The VBWD classified Downs Lake as a High Priority waterbody according to its waterbody classification system, due to the lakes inclusion in the MPCA's impaired waters list.	
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)	159	<p>The VBWD has a non-degradation water quality policy which sets "action triggers" for all of its major waterbodies. Action triggers for VBWD lakes consider the following water quality parameters relative to MPCA water quality standards and prior water quality data (i.e., trend analysis):</p> <ul style="list-style-type: none"> <li>• Secchi disc depth</li> <li>• Total phosphorus</li> </ul> <p>Chlorophyll <i>a</i></p>	Comment noted.
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)	160	Increase stormwater runoff due to the proposed expansion of impervious surfaces at the Lake Elmo Airport will increase the loading of nutrients to Downs Lake. This loading will contribute to the further degradation of Down's Lake due to eutrophication, which is a significant environmental impact.	Total phosphorus, the limiting nutrient in most freshwater lakes, is identified in the Downs Lake watershed management plan as the specific nutrient of concern. Significant increases in phosphorus loading are not expected from the proposed project. Changes in land cover as the result of the proposed project are summarized in EA/EAW Table 5-5. Evaluation of event mean concentrations (EMCs) for phosphorus shows that the replacement of 71.1 acres of cropland with land cover types with lower event mean concentrations will at the least balance out the additional phosphorus from increased 12.6 acres of impervious area. The requirements for treatment of runoff from the proposed project will result in a net

Commenter	ID	Subject	Response
			<p>reduction in phosphorus loading to Down’s Lake. There is no information to suggest that other potential constituents in runoff associated with the proposed action present a threat to the beneficial uses of the lake.</p> <p>Water quality guidelines for water leaving the site will be incorporated into the final design. The infiltration basins shown on the maps are conceptual. During the project design phase, the MAC will submit a design for an infiltration system to accommodate a specific volume and address water quality requirements. The Airport currently has an Industrial SWPPP which requires monitoring of water quality. Best Management Practices have been developed to be a part of the SWPPP, which will be updated during project design.</p> <p>According to FAA Order 1050.1F, a significant impact to surface water exists if the action would:</p> <ol style="list-style-type: none"> <li>1. Exceed water quality standards established by Federal, state, local, and tribal regulatory agencies; or</li> <li>2. Contaminate public drinking water supply such that public health may be adversely affected.</li> </ol> <p>Neither of these impacts will occur with the proposed action, and therefore the project will not result in significant water quality impact.</p>
Mr. Stuart Grubb, PG, Emmons and	161	5. Water Quantity Impacts to Downs Lake The VBWD Downs Lake Management Plan states “The small size of Downs Lake (relative to its	See responses to VBWD Comment IDs 14-23, above, and responses to Grubb Comment IDs 157-160 above

Commenter	ID	Subject	Response
Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)		drainage area), coupled with the fact that Downs Lake has a high overflow point, results in a high potential for flooding. When large quantities of water flow into the lake – as a result of an unusually heavy and long-lasting rainstorm or a sudden spring thaw of heavy snow cover – the lake fills to a point where it overflows. Prior to the lake level reaching the overflow, however, roadways are inundated, and a home and subsurface sewage treatment systems (SSTS) are flooded.” The Plan also states that “The VBWD will cooperate with the City of Lake Elmo and project proposers to identify and evaluate the feasibility of options to mitigate or prevent negative impacts to water levels due to new development within the Downs Lake watershed.”	
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)	162	The proposed Lake Elmo Airport expansion will increase stormwater runoff to Downs Lake because of the expansion of impervious surfaces. Past efforts by the watershed district and residents near Downs Lake to implement flood prevention and mitigation plans have been very contentious. The EAW is inadequate because it does not discuss the impacts of this additional stormwater runoff on Downs Lake. This is a significant environmental impact.	<p>Comment noted. See responses to Mr. Stuart Grubb Comment IDs 157-161 above.</p> <p>The final design of storm water management and snowmelt runoff rates will be managed so future peak rates of runoff leaving the Airport are below or equal to the existing rates and to control storm water volume. The MAC has committed to meet the VBWD rules and regulations regarding control of runoff rates, which would necessarily prevent additional stormwater runoff into Downs Lake. Water quality measures will be designed to meet current standards set by the Federal, State and local entities. As noted in response to Comment ID 156, the conceptual stormwater management plan does not represent a significant impact.</p>

Commenter	ID	Subject	Response
<p>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</p>	<p>163</p>	<p>6. Groundwater Impacts Expansion of the runways at the Lake Elmo Airport will lead to more planes and larger planes using the airport. This in turn will lead to greater fuel storage and distribution, including the potential for new products such as jet fuel. These changes should have been included in the Cumulative Impacts and Cumulative Potential Effects section of the EAW.</p>	<p>The aircraft operations forecast for the extended runway scenario anticipates marginal increases in aircraft operations after project implementation (see EA/EAW Appendix A, Table 18).</p> <p>See response to Comment ID 58, regarding projected increases in multi-engine piston, turboprop, and jet aircraft operations at the Airport.</p> <p>The MAC has no plans to install additional fuel storage/distribution facilities at Lake Elmo Airport, including Jet A fuel.</p> <p>See response to Comment ID 125 regarding Cumulative Impacts and Cumulative Potential Effects.</p>
<p>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</p>	<p>164</p>	<p>The increase in fuel storage is particularly important because it increases the potential for spills and leaks that will impact groundwater. The airport lies within the Baytown/West Lakeland Township Groundwater Contamination Site and Special Well and Boring Construction Area (SWBCA). Following the detection of Volatile organic compounds (VOCs) in the groundwater in 1987 and 1988, the Minnesota Department of Health (MDH) issued a well-drilling advisory (now SWBCA) for portions of West Lakeland Township, Baytown Township, and the City of Bayport. This advisory puts limits on the construction of new wells, and requires additional water testing of new wells. Groundwater contaminants emanating from the airport would further worsen and expand the</p>	<p>The MAC has voluntarily prepared a Spill Prevention, Control, and Countermeasures Plan (SPCCP) based on the requirements of the Clean Water Act. However, the MAC's fuel/oil storage capacities at Lake Elmo Airport do not exceed any regulatory thresholds that would require preparation of a SPCCP. The MAC has developed the document as a best management practice for the facility.</p> <p>In addition, the MAC has no plans to install additional fuel storage/distribution facilities at Lake Elmo Airport, including Jet A fuel. See response to Grubb Comment ID 163 above.</p> <p>As stated under response to Mr. Stuart Grubb, Comment ID 160, above, the Airport currently has an</p>

Commenter	ID	Subject	Response
		contamination plume and place an additional burden on residential well owners who already have suspect water supplies. This is a significant environmental impact.	Industrial SWPPP which requires monitoring of water quality. The SWPPP will be updated during project design. The SWPPP references the SPCCP. For any substances not directly addressed in the SPCCP that may have the potential to spill and impact storm water discharges, the spill prevention and response procedures identified within the SPCCP will be adopted and implemented to minimize the potential for spills and/or releases. By observing the procedures outlined in these documents, there will be no significant impacts to groundwater.
Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)	165	7. Contaminated Soils The source of the contaminated groundwater below the Lake Elmo Airport was long suspected to be at the airport. Later, a contamination source was identified west of the airport. Fuel, degreasers, and other potential contaminants are still used at the airport, particularly in areas where maintenance tasks are performed.	<p>The difference in elevation between the ground surface and the contaminated groundwater under the Airport in the area of the proposed project is at least 50 feet. Therefore, given the depth of groundwater contamination under the Airport, the proposed project will have no effect on the existing groundwater contamination, and the existing groundwater contamination will not affect the proposed project.</p> <p>As noted in EA/EAW Appendix H, “the contaminated groundwater plume is located primarily in the Prairie du Chien Aquifer, the Jordan Sandstone Aquifer and, in certain areas, the Tunnel City Aquifer, all located more than 50 feet below the ground surface.” Appendix H goes on to state that “The Airport is located at approximately elevation 920 to 930. According to the USEPA’s report, groundwater is located at approximately elevation 875 to 885 in the area of the Airport. Furthermore, the Prairie du Chien Aquifer, the highest elevation of the contaminated aquifers, is located at a depth of approximately</p>



Commenter	ID	Subject	Response
			<p>elevation 850. Proposed project activities are not expected to reach a depth that would encounter groundwater. While the site poses potentially hazardous materials concerns for vapor intrusion, the site is regulated and monitored and recent sampling has confirmed that no volatile contaminants have exceeded State or Federal health-based screening levels. Previous Airport development has not been precluded as a result of known contamination. Therefore, no additional investigation is warranted.”</p> <p>According to the latest groundwater monitoring data published by the Valley Branch Watershed District (VBWD) for the calendar year 2016, groundwater beneath the Airport generally flows from the northwest to the southeast. The top elevation of groundwater underneath the Airport ranges from approximately 875 feet above sea level in the northwest corner of Airport property to approximately 860 feet above sea level in the southeast corner. One of the wells that the VBWD uses to monitor groundwater levels in its jurisdiction is near the northeast corner of Airport property. Observations at this well in 2016 indicate an average top elevation of groundwater at 867.6 feet above sea level, compared to a top of well ground surface elevation of 934.9 feet above sea level. Thus, the difference in elevation between the ground surface and top of groundwater at this well is approximately 67 feet. This monitoring data is available on the VBWD website at</p>

Commenter	ID	Subject	Response
			<p data-bbox="1207 235 1963 300"><a href="http://www.vbwd.org/reports/groundwater_levels/index.php">http://www.vbwd.org/reports/groundwater_levels/index.php</a>.</p> <p data-bbox="1207 341 1963 1291">The ground surface topography and associated surface water drainage on the Airport generally slopes from northeast to southwest, except in the extreme southeast corner of Airport property where it slopes toward the southeast. Ground surface elevations on the Airport range from approximately 940 feet above sea level in the northeast corner of Airport property to approximately 920 feet above sea level in the southwest corner. Based on comparison of the groundwater elevations and surface topography elevations on the Airport, the depth to groundwater is approximately 50 feet or greater in areas directly affected by the proposed project. In most areas, no excavation will take place because primary construction activities will involve placing fill material on top of the ground to build up the surface topography for the runways and taxiways. Excavation may occur to replace poor soils in select locations identified following detailed geotechnical investigations, but these activities are not expected to disturb any soils more than 5 feet below the existing ground surface and therefore will not disturb the aquifers beneath the Airport. The proposed project is not expected to contribute to or exacerbate groundwater contamination on and surrounding the Airport, as stated in Section 5.7 of the Draft EA/EAW.</p> <p data-bbox="1207 1331 1963 1396">The MAC is committed to protecting the groundwater and other water resources on which the Airport and</p>

Commenter	ID	Subject	Response
			<p>its neighbors depend. The Airport is outside any wellhead protection areas identified by the MDH, but the MDH Minnesota Well Index identifies Lake Elmo Airport as having roughly 26 wells on the airfield drawing from all four area aquifers with only a few wells reported sealed or abandoned. The MAC has adopted a sanitary sewer and water policy for the Airport requiring all noncompliant wells be sealed. In accordance with federal and state regulations, the MAC also has a storm water pollution prevention plan (SWPPP) and a spill prevention, containment, and countermeasures (SPCC) plan which it administers using best management practices to prevent further contamination of groundwater and surface water that may result from construction activities and typical Airport operations.</p>
<p>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</p>	<p>166</p>	<p>The history of contaminated groundwater in the area of the Airport must be a consideration for any future construction plans. It would be prudent to investigate subsurface soils for VOCs and other contaminants prior to any excavation activities. This will add costs that are not currently included in the construction cost estimates.</p>	<p>Subsurface soils will be investigated for VOCs during geotechnical analysis related to project design.</p> <p>See also response to Grubb Comment ID 165 above.</p>
<p>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated</p>	<p>167</p>	<p>8. Incorrect Evaluation of NPAIS Status In Section 3.2.2 the EAW uses incorrect and inaccurate information when evaluating whether the Lake Elmo Airport should be included in the National Plan of Integrated Airport Systems, which</p>	<p>As stated in EA/EAW Section 3.2.2, the drive distance and drive time analysis presented therein demonstrates that Lake Elmo Airport “not only serves a specific function as a reliever airport in MAC’s system of airports but also serves a specific geographic area that cannot be adequately served by</p>

Commenter	ID	Subject	Response
April 10, 2018 (on behalf of West Lakeland Township)		<p>is a requirement to receive federal funding. The EAW states that:  “FAA Order 5090.3C, Field Formulation of the National Plan of Integrated Airport Systems (NPIAS), states that an airport should be included in the NPIAS if it is more than a 20-mile driving distance, or 30-minute drive time, from the nearest existing or proposed NPIAS airport.”  Actually, the NPAIS guidance says (FAA Order 5090.3C, Section 2-5. P. 13):  “b. An existing airport that is included in an accepted SASP or MASP may be included in the NPIAS if it:  (1) has at least 10 based aircraft, and  (2) serves a community located 30 minutes or more average ground travel time (for the purpose of systems analysis, a 20 mile radius is often used as the equivalent of 30 minutes ground travel time) from the nearest existing or proposed NPIAS airport“  Therefore, the EAW uses incorrect criteria when evaluating the significance of the Lake Elmo Airport as a reliever airport. The “average ground travel time” should be used, not the “drive time with traffic”. The Lake Elmo Airport would not qualify for NPIAS funding under these criteria. While this is not an environmental concern, it does indicate that the EAW is inadequate and that further investigation is required.</p>	<p>another existing airport.” EA/EAW Section 3.2.2 does not state that the drive distance and drive time analysis justifies inclusion of Lake Elmo Airport in the NPIAS. Lake Elmo Airport is designated by FAA as a reliever airport, which qualifies the airport as a NPIAS airport regardless of drive distance and drive time from Lake Elmo Airport to other NPIAS airports. No additional investigation is necessary and therefore MAC disagrees with West Lakeland Township’s characterization of the EA/EAW as inaccurate and incomplete.</p>
Mr. Stuart Grubb, PG, Emmons and	168	<p>9. Conclusions  The issues discussed in this letter identify mistakes and omissions in the EAW for the</p>	<p>There are no environmental impacts which exceed thresholds of significance as defined by the FAA in its role as responsible federal agency under the National</p>

Commenter	ID	Subject	Response
Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)		proposed Runway 14/32 Relocation/Extension and Associated improvements at the Lake Elmo Airport. These issues are significant environmental impacts, and an Environmental Impact Statement should be required before the project continues any further.	Environmental Policy Act, and as defined under the Minnesota Environmental Policy Act.
Mr. Ryan Stempksi, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)	169	<p><b>WEST LAKELAND TOWNSHIP ORDINANCE:</b>  Performance standards for roadways are listed in Section 8.10 of the Township Ordinances. The following standards are called out by ordinance:</p> <ul style="list-style-type: none"> <li>• <b>8.10.1:</b> Proposed streets shall conform to the state, county or local road plans or preliminary plans as have been prepared, adopted and/or filed as prescribed by law.</li> <li>• <b>8.10.12:</b> The street arrangements shall not be such as to cause hardship to owners of adjoining property in platting their own land and providing convenient access to it.</li> <li>• <b>8.10.17.2:</b> Drainage easements shall be dedicated around wetlands and DNR designated lakes, rivers and streams up to the 100 year flood elevation or delineated boundary, whichever is greater.</li> </ul>	Comment noted.
Mr. Ryan Stempksi, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14,	170	<p><u>Proposed Road Alignment (Horizontal Curvature):</u>  30th Street North is a collector road that is important to the traffic flow of the region. It is currently a straight alignment with a posted speed limit of 55 MPH. This is an ideal route for the community to get from local roads to the County System efficiently and a benefit to the current transportation system. The proposed horizontal</p>	As referenced in Mr. Ryan Stempksi Comment ID 169, Ordinance Section 8.10.12 requires that “street arrangements shall not be such as to cause hardship to owners of adjoining property in platting their own land and providing convenient access to it.” The only adjoining property to the proposed realigned segment of 30 <sup>th</sup> Street North is the Airport’s property. No other properties would experience hardship with respect to

Commenter	ID	Subject	Response
2018 (on behalf of West Lakeland Township)		curves (in the selected Alternative 3) require a much lower posted speed limit (30 MPH) and will impact this route significantly. The proposed realignment does not provide an equal benefit to what exists today, which does not comply with Ordinance Section 8.10.12.	platting their own land or providing convenient access to their property.
Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)	171	It also appears that the proposed horizontal curves do not meet state standards (see MnDOT Road Design Manual). The Township requests that the roadway does not include superelevation to meet design speeds for horizontal alignments. Additional detail for each horizontal curve should be provided to confirm minimum state standards are met in compliance with Ordinance Section 8.10.1.	<p>Preliminary design details regarding horizontal curve radius, length, and superelevation are included in EA/EAW Appendix B, Table 3.</p> <p>The curve length, radius, and superelevation for horizontal curves #1 and #2 shown in Appendix B, Table 3, meet design speed (posted speed +5) of 40 MPH under table 3-3.02A of the MnDOT Roadway Design Manual.</p> <p>The curve length and superelevation for horizontal curve #3 shown in Appendix B, Table 3, meet a design speed (posted speed +5) of 30 MPH per table 3-2.03A of the MnDOT Roadway Design Manual. Although the curve radius shown in Appendix B, Table 3, for this curve is less than the value shown in table 3-2.03A of the MnDOT Roadway Design Manual, the radius will be modified during design to meet the 280-foot minimum.</p> <p>It is unclear why the Township would request that superelevation not be used in the proposed road design. Superelevation is a vital component of a horizontal curve to allow a vehicle to safely and comfortably navigate through the curve at a higher rate of speed. It is possible to design roadways</p>



Commenter	ID	Subject	Response
			without superelevation; however, this practice is more practical in a low-speed urban setting (40 mph or less) where numerous driveways and intersections would be impacted by the incorporation of a superelevated roadway. This does not apply to the proposed realigned segment of 30 <sup>th</sup> Street North.
Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)	172	<u>Construction and Long-Term Maintenance:</u> Constructability of the proposed realignment may prove to be challenging and costlier than reported in the 30th Street North Realignment Alternatives Review. The heavy soils (silts and clays) in this location are highly frost susceptible, which are detrimental to the long-term condition of the road. Soil borings will be required to confirm what mitigation efforts may need to be added to the sub-base of the road section. Certain methods may or may not be acceptable to the Township for long-term maintenance. We also have additional concerns with moving the road alignment alongside and within a wetland area. Soils may be saturated and possibly organic, requiring additional solutions to standard road construction (and future reconstruction). All these factors add costs to the project, delays in construction, and additional maintenance responsibilities for the road authority (ultimately West Lakeland Township). Currently responsibility for maintenance and reconstruction is shared between West Lakeland Township and Baytown Township. The shifting of alignment to a location entirely within West Lakeland Township adds	<p>As part of the continued design of the roadway, a geotechnical analysis will be completed to analyze the site in more detail, develop a pavement design that meets the service life and needs of the roadway, and provide geotechnical recommendations for the roadway subgrade. If necessary, mitigation measures will be developed during project design in accordance to MnDOT standards.</p> <p>As noted in its Draft 2040 Comprehensive Plan, “Baytown has offered to continuing the current shared maintenance [of 30<sup>th</sup> Street North] if the land area between the relocated road and the Baytown Township boundary becomes part of Baytown Township after the road is relocated. The boundary relocation would result in the entire airport remaining in Baytown Township.” If the area north of the realigned 30<sup>th</sup> were annexed by Baytown Township, it would not decrease West Lakeland Township property tax revenue. As noted under response to Mr. Thomas E. Casey, Comment ID 107, above, the MAC is open to continuing discussions to find a solution whereby 30<sup>th</sup> Street North can continue to exist as a realigned through street.</p>

Commenter	ID	Subject	Response
		additional responsibility onto West Lakeland that does not exist today.	
Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)	173	<u>Flood Elevation Versus the Proposed Road Alignment:</u> A drainage easement up to the 100-Year HWL of the wetland would be required per Ordinance Section 8.10.17.2. This area would not be allowed to have any portion of the road constructed within it, as its intended purpose is to allow for the 100-Year Storm Event. Furthermore, standard practice in West Lakeland Township is to require that the road base be constructed entirely above the 100-Year HWL to avoid saturation of the road base.	As referenced in Mr. Ryan Stempski Comment ID 169, Ordinance Section 8.10.17.2 requires that “Drainage easements shall be provided along each side of the centerline of any water course or drainage channel to a sufficient width to provide proper maintenance and protection and to provide for storm water runoff and installation and maintenance of drainage systems. Drainage systems shall be dedicated around wetlands and DNR designated lakes, rivers and streams up to the 100-year flood elevation or delineated boundary, whichever is greater.”  Drainage easements will be provided, and drainage structures will be dedicated in accordance with the Township Ordinance 8.10.17.2 requirements. The road base for the realigned segment of 30 <sup>th</sup> Street North will be designed such that it is entirely above the 100-year HWL.
Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West	174	<u>Storm Water Management:</u> The ownership and maintenance responsibilities of the proposed storm water facilities must be confirmed. The Township does not have staff or resources to take on additional maintenance of these facilities. The proposed infiltration basins must drain within 24 hours of a storm based on requirements within the Aircraft Operating Area. It may not be possible to achieve this type of infiltration rate for the soils anticipated in this area. Should engineered soils be proposed or	Ditches and culverts will be integrated into the project design to provide drainage from the north to the south side of the realigned 30 <sup>th</sup> Street right-of-way, similar to the existing condition. Apart from these ditches and culverts, proposed storm water facilities will be limited to existing Airport property and will be maintained by the Airport in accordance with applicable FAA storm water requirements. Stormwater detention ponds will be designed to drain completely within a 48-hour period, as required by FAA Advisory Circular 150/5200-33B.

Commenter	ID	Subject	Response
Lakeland Township)		discovered in-situ through investigation, their ongoing maintenance will be a major responsibility. Sediment, debris, freeze/thaw cycles, and other factors present year-round challenges to meet this type of a drain dry standard in perpetuity.	See also response to Stempski Comment ID 173 above.
Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)	175	<u>Wetland Impacts Due to Realignment:</u> Environmental impacts to existing wetlands will be commented on by the LGU for this area, which is Valley Branch Watershed District.	Comment noted. In response to the Draft EA/EAW, the VBWD submitted a comment letter dated April 13, 2018. Please see responses to Comment IDs 14-23 above.

## Evan Barrett

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**From:** Leqve, Chad <Chad.Leqve@mspmacc.org>  
**Sent:** Tuesday, February 27, 2018 2:55 PM  
**To:** Evan Barrett; Wilson, Evan  
**Cc:** Nelson, Dana  
**Subject:** Fwd: Lake Elmo Airport – Draft Federal EA / State EAW

FYI - MDA comment on 21D EA/EAW

### CHAD E. LEQVE

*Director of Environment*

#### Metropolitan Airports Commission

[6040 28<sup>th</sup> Avenue South](#)

[Minneapolis, MN 55450](#)

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[facebook](#) [twitter](#) [instagram](#)

Begin forwarded message:

**From:** "Balk, Becky (MDA)" <[becky.balk@state.mn.us](mailto:becky.balk@state.mn.us)>  
**Date:** February 27, 2018 at 2:06:45 PM CST  
**To:** "[chad.leqve@mspmacc.org](mailto:chad.leqve@mspmacc.org)" <[chad.leqve@mspmacc.org](mailto:chad.leqve@mspmacc.org)>  
**Cc:** "Patton, Bob (MDA)" <[bob.patton@state.mn.us](mailto:bob.patton@state.mn.us)>, "Balk, Becky (MDA)" <[becky.balk@state.mn.us](mailto:becky.balk@state.mn.us)>, "Wohlman, Matthew (MDA)" <[matthew.wohlman@state.mn.us](mailto:matthew.wohlman@state.mn.us)>  
**Subject:** Lake Elmo Airport – Draft Federal EA / State EAW

Dear Mr. Leqve,

Thank you for the opportunity to comment on the Lake Elmo Airport – Draft Federal EA / State EAW. The Minnesota Department of Agriculture would like to comment on the potential loss of farmland resulting from Alternative B.

1 The MDA recommends that the EA/EAW address the acreage or impact of severed, triangulated or isolated farmland resulting from the proposed alignment of 30<sup>th</sup> Street potentially impacting the parcel located in southwest corner of 30<sup>th</sup> Street and Neal Avenue as indicated in Alternative B. The impact may be farming remnants that are difficult from a practical standpoint. There may be problems of getting to the field and once there, problems of maneuvering farm equipment on the field. Also, smaller fields that are oddly shaped may be less valuable than fields of typical dimension and size. The parcels of farmland should be identified by location and acreage. Any loss of that farmland should be included in the farmland conversion impact rating.

Again, thank you for the opportunity to comment. Please feel free to contact me if you have any questions.

**Becky Balk**

**Land Use Program Manager**  
**Agricultural Marketing & Development Division**  
625 Robert Street North | St Paul, MN, 55155  
651-201-6369 (Direct Line) | [Becky.Balk@state.mn.us](mailto:Becky.Balk@state.mn.us)  
[www.mda.state.mn.us](http://www.mda.state.mn.us)

[Mnfarmlink.com](http://Mnfarmlink.com)



March 21<sup>st</sup>, 2018

Chad Leqve  
Director of Environment  
Metropolitan Airports Commission  
6040 S 28th Ave  
Minneapolis, MN 55450

SUBJECT: EAW18-004  
East of MN 5 and South of MN 36  
Lake Elmo, Washington County  
Control Section 8214

Dear Mr. Leqve:

Thank you for the opportunity to review the Lake Elmo Airport Environmental Assessment. Please note that MnDOT's review of this EAW does not constitute approval of a regional traffic analysis and is not a specific approval for access or new roadway improvements. As plans are refined, we would like the opportunity to meet with our partners and to review the updated information. MnDOT's staff has reviewed the document and has the following comments:

***Traffic:***

MN 5 was a turnback to Washington County.

2 The alternatives 4A & 4B shown on Pg. 41 have speed limits shown. If there is a current speed limit authorization for this location it will not remain valid due to the reconstruction. Speed limits would revert to statutory limits unless the road authority were to request a speed study.

For questions regarding these comments please contact Kaare Festvog at 651-234-7814 or [kaare.festvog@state.mn.us](mailto:kaare.festvog@state.mn.us).

***Permits:***

Any use of or work within or affecting MnDOT right of way requires a permit. Permit forms are available from MnDOT's utility website at <http://www.dot.state.mn.us/utility/index.html>

3 Please include one to one set of plans formatted to 11X17 with each permit application. Please submit/send all permit applications and 11X17plan sets to: [metropermitapps.dot@state.mn.us](mailto:metropermitapps.dot@state.mn.us). Please direct any questions regarding permit requirements to Buck Craig (651-234-7911) of MnDOT's Metro Permits Section.

***Review Submittal Options:***

MnDOT's goal is to complete the review of plans within 30 days. Submittals sent electronically can usually be turned around faster. There are four submittal options:

- 4
1. One (1) electronic pdf version of the plans. MnDOT accept plans at [metrodevreviews.dot@state.mn.us](mailto:metrodevreviews.dot@state.mn.us) provided that each e-mail is less than 20 megabytes.
  2. Three (3) sets of full size plans. Although submitting seven sets of full size plans will expedite the review process. Send plans to:

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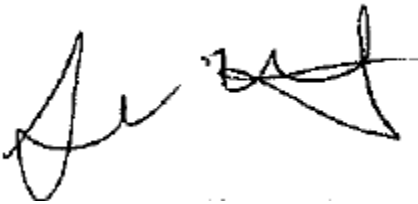
4

MnDOT – Metro District Planning Section  
Development Reviews Coordinator  
1500 West County Road B-2  
Roseville, MN 55113

3. One (1) compact disk.
4. Plans can also be submitted to MnDOT's External FTP Site at: <ftp://ftp2.dot.state.mn.us/pub/incoming/MetroWatersEdge/Planning>. Internet Explorer may not work using FTP so use an FTP Client or your Windows Explorer (My Computer). Notify [metrodevreviews.dot@state.mn.us](mailto:metrodevreviews.dot@state.mn.us) indicating the plans have been submitted on the FTP site.

If you have any questions concerning this review, please contact me at 651-234-7788.

Sincerely,



Jennifer Wiltgen  
MnDOT Principal Planner

**Copy sent via E-Mail:**

Buck Craig, Permits  
Nancy Jacobson, Design  
Bryce Fossand, Water Resources  
Ashley Roup, Right-of-Way  
Rylan Juran, Aviation  
Russ Owen, Metropolitan Council  
Kaare Festvog, Traffic  
Ryan Coddington, Area Engineer

Minnesota Department of Natural Resources  
Ecological and Water Resource  
1200 Warner Road  
St. Paul, MN 55106

April 13, 2018

Transmitted Electronically

Chad Leque  
Director of Environment for MAC  
6040 28<sup>th</sup> Ave S  
Minneapolis, MN 55450

**Re: EA/EAW for Runway 14/32 Relocation/Extension and Associated Improvements**

Dear Chad Leque,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA)/Environmental Assessment Worksheet (EAW) for the Runway 14/32 Relocation/Extension and Associated Improvements project located at the Lake Elmo airport. We offer the following comments for your consideration.

Section 4.3 Geology, Soils, and Topography

5

- Karst features occur on airport properties and potential sinkholes have been mapped within the area. While not field checked by DNR, there is a potential sinkhole located in the northwest part of the airport (north of 40<sup>th</sup> Street North, in an area where no work is planned). The [Minnesota Geospatial Commons](#) is a website that houses numerous geospatial resources, included on this website is a “Karst Feature Inventory Points” data layer that can be downloaded and utilized to inspect the potential for karst features within the area of the airport. We recommend this GIS layer be looked at, and suggest that a geophysical investigation of the work areas be conducted to ensure the unknown karst features do not exist in these areas. Additional information on karst can be found at the websites included at the bottom of this letter.

Section 4.5.1. Groundwater:

6

- While not likely to impact any EIS need decisions for this project, DNR groundwater staff found the groundwater flow discussion incorrect. The water table and Mt. Simon aquifers flow to the St. Croix. The Prairie du Chien, Jordan, and Tunnel City-Wonewoc aquifers have a groundwater divide across the VBWD in which water on the west flows toward the Mississippi and water to the east flows toward the St. Croix. [See Plate 5 of Washington County GW Atlas.](#)

Section 4.5.2 Lakes:

7

- The number of public waters and public water wetlands within a two-mile radius of the Lake Elmo Airport is incorrect. In addition to the six lakes listed, there are an additional 15 public water wetlands within a two-mile radius. For each of the public waters and public water wetlands within the two-mile radius, please list their PWI number for identification purposes.
- There is one public water wetland (PWI #82046100) located on MAC property. Please include this fact and a description of this public water wetland in this section.

8

9

- Please include a figure showing the location of the public waters and public water wetlands relative to the airport property. Locations of Public Waters (PW) Basin and Watercourse Delineations data is available on the Minnesota Geospatial Commons website. In addition, a DNR Public Waters Inventory map for Washington County can be used to represent their locations.

#### Section 4.5.6 Wetlands:

10

- The wetland area identified as Wetland 1 is also part of public water wetland 82046100. The boundary between the NWI portion of this wetland and the public water wetland portion of this wetland is the ordinary high water level (OHWL) elevation. The OHWL is DNR's jurisdictional elevation. Activities at and below the OHWL are subject to state public waters work permit rules.
- How would filling of the wetlands north of 30<sup>th</sup> Street North impact the water level of and flow into public water wetland 82046100?

11

#### Section 5.2.2 Listed Species:

12

- While the EA/EAW identifies that the project may pose impacts to the state-listed Blanding's turtle, and how impacts may occur, it does not identify mitigation measures that the project proposer will employ to avoid or mitigate potential impacts. Please identify specific avoidance measures that will be employed as part of the project to avoid impact this rare turtle, in addition to posting the Blanding's turtle Factsheet/Flyer at the construction site.

#### Table 5-6:

- As a reminder, in addition to the permits listed, any construction dewatering that exceeds 10,000 gallons per day, or one million gallons per year, must be approved under a DNR Water Appropriation Permit.

13

On behalf of the DNR, thank you for consideration of these comments.

Sincerely,

/s/ Rebecca Horton  
Region Environmental Assessment Ecologist

CC: Mary Coburn, Lisa Joyal, Joe Richter, Jen Sorenson

#### Websites:

Minnesota Geospatial Commons: <https://gisdata.mn.gov/>

Springs, springsheds, and karst:

[https://www.dnr.state.mn.us/waters/groundwater\\_section/mapping/springs.html](https://www.dnr.state.mn.us/waters/groundwater_section/mapping/springs.html)

Minnesota Regions Prone to Surface Karst Feature Development:

[https://files.dnr.state.mn.us/waters/groundwater\\_section/mapping/gw/gw01\\_report.pdf](https://files.dnr.state.mn.us/waters/groundwater_section/mapping/gw/gw01_report.pdf)

Plate 5 Washington County Atlas:

[https://www.dnr.state.mn.us/waters/programs/gw\\_section/mapping/platesum/washcga.html](https://www.dnr.state.mn.us/waters/programs/gw_section/mapping/platesum/washcga.html)



April 13, 2018

Chad Leque  
Metropolitan Airports Commission  
6040 S 28<sup>th</sup> Ave  
Minneapolis, MN 55450

**Re: Lake Elmo Airport Environmental Assessment, Draft EA/EAW**

Dear Mr. Leque:

Valley Branch Watershed District (VBWD) has reviewed the Draft Federal Environmental Assessment (EA)/State of Minnesota Environmental assessment Worksheet (EAW) for Runway 14/32 Relocation/Extension & Associated Improvements at the Lake Elmo Airport and provides the following comments:

14

1. The comments in this letter are not an approval of the project by VBWD. A VBWD permit and VBWD approval of Minnesota Wetland Conservation Act-related project elements will be required prior to construction of any of the alternatives discussed in the EA/EAW.

15

2. VBWD is the local government unit (LGU) for administering the Minnesota Wetland Conservation Act (WCA). The EA/EAW states that 2.36 acres of wetland will be directly impacted by the preferred alternative. To conform to the WCA, wetland impacts must be avoided. If they cannot be avoided, they must be minimized. As noted in the EA/EAW, wetland impacts will need to be mitigated and the mitigation is likely to be completed through the purchase of wetland banking credits. If VBWD were to approve the wetland impacts, VBWD strongly encourages the Metropolitan Airports Commission (MAC) to complete the mitigation within the same watershed and as near to the Lake Elmo Airport as possible to minimize the hydrologic impact of the lost wetlands on site.

16

3. VBWD also requires that “any wetland alteration shall not reduce the existing storage volume in the immediate watershed. . . .” Required wetland mitigation in #2, above, could then be accomplished with the creation of onsite compensatory storage.

17

4. The EA/EAW appears to incorrectly cite VBWD’s rule for wetland buffers. The EA/EAW states that VBWD requires a 25-foot-minimum wetland buffer between the wetland and impervious surfaces. VBWD actually requires wetland buffers to be established around all wetlands,



JILL LUCAS • LINCOLN FETCHER • ANTHONY HAIDER • EDWARD MARCHAN • DAVID SEWELL

VALLEY BRANCH WATERSHED DISTRICT • P.O. BOX 838 • LAKE ELMO, MINNESOTA 55042-0538

regardless of their proximity to impervious surfaces. Furthermore, there are also several requirements for the buffers that may not have been taken into account. Such requirements include, but are not limited to the following:

17

- a. "... a minimum 25-foot vegetative buffer strip immediately adjacent and contiguous to the delineated wetland boundary or the Ordinary High Water Level (OHW), whichever is greater in elevation..."
- b. "Buffer vegetation shall not be cultivated, cropped, pastured, mowed, fertilized, subject to the placement of mulch or yard waste, or otherwise disturbed..."
- c. "No new structure or impervious surface shall be placed within a buffer."
- d. "No fill, debris, or other material shall be excavated from or placed within a buffer without VBWD approval."
- e.

The language in the EA/EAW regarding wetland buffers should be revised, and the final design and permit application will need to consider all aspects of wetland impacts and required mitigation and buffers.

5. Vegetation is typically mowed immediately adjacent to an impervious surface. Mowed areas are not allowed within wetland buffers, except for a maximum 6-foot-wide access path, so any mowed areas adjacent to impervious areas, such as the rerouted 30<sup>th</sup> Street N, cannot be counted in the wetland buffer. The mowed areas and their potential impact on minimum and average wetland buffers will need to be taken into account during final design and permitting.

18

19

6. The EA/EAW states that West Lakeland Township requirements for stormwater management are the most stringent requirements and require 0.55 inches of runoff from the new and fully reconstructed impervious surface on the site, or 1.1 inches of runoff from the net increase in impervious area on the site. As cited in the EA/EAW, VBWD's standards, per Rule 2, Standard 6B, require 1.1 inches of runoff be retained on site from new or reconstructed surfaces. This standard is more stringent than the West Lakeland Township standard and should be used when sizing stormwater management practices during final design.

7. Figure 5-5 provides conceptual layout of proposed storage and infiltration basins for stormwater management. Available soils data indicates that most of the airport site has hydrologic soil group B soils, indicating that infiltration may be feasible; however, multiple infiltration basins are located near wetlands. Wetlands are usually wet because the soil is typically hydrologic group C or D soils that do not infiltrate well. Soil borings and infiltration tests will be necessary to confirm soil types and infiltration capacity to ensure that stormwater management at the site will function as designed and meet VBWD performance standards.

20

21

8. Nearby wetlands may also signify high local groundwater, which may impact the ability to infiltrate stormwater runoff, both from a soil capacity standpoint and the 3-foot-minimum distance required between the bottom of the infiltration area and the seasonally high water table. A determination of the seasonally high groundwater table will be necessary to ensure infiltration will be feasible.

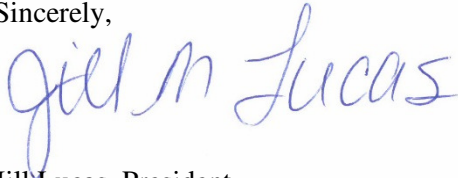
9. The project will impact the hydrology to multiple landlocked basins. The final design and permitting will need to conform to VBWD hydrologic standards in VBWD Rules 2 and 5.

22

- 23** | 10. As proposed, the project would fill 0.06 acres of wetlands within a Zone A floodplain. The final design will need to conform to the VBWD Rule 5 standard regarding filling in the floodplain.

Thank you for the opportunity to comment on the draft EA/EAW. We look forward to reviewing final plans for the chosen alternative.

Sincerely,



Jill Lucas, President  
Valley Branch Watershed District

- c: Susannah Torseth, VBWD Attorney  
Emily Becker, City Planning Director—City of Lake Elmo  
Nancy Healey, Clerk—Baytown Township  
Dan Kylo, Board Chair—West Lakeland Township





April 18, 2018

Metropolitan Airports Commission  
 Attn: Chad Leque  
 6040 S 28th Ave  
 Minneapolis, MN 55450

**RE: Lake Elmo Airport EAW**

Dear Chad,

The Washington Conservation District (WCD) has received and reviewed the above-mentioned EAW. The WCD review focuses on wetlands, erosion and sediment control, natural area management, and stormwater management. Based on this review the WCD offers the following comments:

**Section 5 –Biological Resources (including fish, wildlife, and plants)**

5.2.2 Listed Species

24 | USFWS has stated that the preferred alternative is not likely to adversely affect the Rusty patched bumble bee. Given that the study area is within the low potential zone identified for further conservation efforts, the restoration on tallgrass prairie would provide critical habitat for this and other pollinator species.

- Minimize pesticide drift from agricultural lands. The proposed location of the 27.5 acres of prairie restoration has corn/soy rotation on adjacent lands to the south and west. Consider alternate locations or create a windbreak to minimize the exposure to insecticides.
- The Rusty Patched Bumble Bee often overwinters in or near woodlands and forages on woodland ephemeral flowers in the spring. Maintain and enhance woodlands for habitat. Consider placement of prairie restoration adjacent to existing woodlands for habitat heterogeneity.

25

5.7 Hazardous Materials, Solid Waste, and Pollution Prevention

26 | The document notes “Based on the information above, there are no hazardous materials or solid waste impacts expected for either the preferred alternative or the no-action alternative.” Will there be an increase or change in chemicals used as part of the airport expansion? What are the control measures proposed for chemicals stored and used onsite as part of normal airport operations, such as salt and other deicers?

5.9 Land Use

- An updated MLCCS dataset was completed late last year and is available via the DNR.
- The source of the MLCCS data used in the report is not Mead & Hunt, but rather the DNR (and generated mostly by the WCD). Table 4.6 notation should be updated as well.
- Use of native vegetation and habitat restoration is encouraged in the open space areas, including native vegetated buffers around stormwater treatment systems.

28

27

5.14.1 Wetlands

- The TEP is for the MN WCA, but can include the Corps. BWSR and WCD staff attended the TEP field review as well.

29

- 30 | • The WCA permitting process will address the avoidance, minimization, and mitigation of the proposed wetland impacts.

#### 5.14.2 Stormwater

- 31 | • The EAW states the Township requirements are stricter than the VBWD. In fact these rules are almost identical. In both rules the 1.1" new and redevelopment standard applies to the proposed airport expansion, not the 0.55" linear project redevelopment standard. The only difference between the two rules is the Township requires the submission of a 1 year storm event summary from the HydroCad model needed to fulfill the Watershed District permitting requirements (review provided by MSCWMO Administrator who worked with West Lakeland Twp to develop their stormwater rules).
- The EAW indicates the site will meet Township and VBWD infiltration/volume control guidelines. WCD encourages the use of bioretention to meet the onsite volume retention standards. Bioretention promotes both infiltration and evapotranspiration which more effectively mimics terrestrial hydrology than pure infiltration systems. These systems are designed to be distributed throughout the site and treat small contributing drainage areas, breaking up larger catchments into smaller, more manageable parts. Minimizing the drainage area provides multiple benefits to stormwater treatment, including the potential for reduced infrastructure conveyance costs.

32 | To ensure the long-term effectiveness of volume control, the following design specifications are presented for consideration:

- Do not rely on long-term infiltration from unlined stormwater ponds or wet detention basins
- Install bioretention/infiltration practices off-line (i.e. high flows are bypassed)
- Include flow-splitter and high-flow bypass
- Provide pre-treatment (especially for sediment to prolong the life of a practice)
- Keep the max water depth to acceptable levels based on soil types and actual infiltration rates
- Refer to the Minnesota Stormwater Manual, 2013 (on MN PCA website) for additional design and implementation considerations
- Minimize soil compaction and provide soil restoration in landscaped areas to enhance infiltration
- Deep-rip the soils with a toothed bucket in low or compacted areas to promote infiltration after major construction is complete

#### Conclusions

There are no known impacts that have not already been addressed in this EAW that warrant an Environmental Impact Statement, but some additional information may be needed as noted above. The Washington Conservation District appreciates the opportunity to review this EAW. Please call me at 651-330-8220, extension 20, if you have any questions about our review.

Sincerely,



Jay Riggs, District Manager  
Washington Conservation District

Cc: John Hanson, VBWD



**Public Works Department**

**Donald J. Theisen, P.E.**  
Director

**Wayne H. Sandberg, P.E.**  
Deputy Director/County Engineer

---

April 19, 2018

Lake Elmo Airport EA/EAW Comments  
c/o MAC Environment Department  
6040 28<sup>th</sup> Avenue South  
Minneapolis MN 55450

**Re: Washington County Comments on EA/EAW Lake Elmo Airport Runway 14/32 Relocation/Extension & Associated Improvements**

Metropolitan Airports Commission (MAC) Environment Department,

Thank you for the opportunity for Washington County to submit comments on the Environmental Assessment (EA) / Environmental Assessment Worksheet (EAW) for the Lake Elmo Airport Runway 14/32 Relocation/Extension & Associated Improvements.

We understand that in 2016, after a two year planning process, the Lake Elmo Airport Long Term Comprehensive Plan (LCTP) was adopted by the Metropolitan Council. The plan took into consideration the expansion of Manning Avenue to a four-lane divided highway between Trunk Highway (TH) 5 and County State Aid Highway (CSAH) 10, 10th Street North. Preliminary design for the four-lane divided highway section adjacent to Lake Elmo Airport continues. The current roadway design indicates that the expanded roadway footprint can be accommodated within the existing right-of-way, so acquisition of additional airport property to accommodate the future Manning Avenue corridor is likely not needed. This will benefit the Manning Avenue project by reducing right-of-way acquisition costs and the timeframe for approvals through the MAC and Federal Aviation Administration (FAA).

The EA/EAW has been reviewed and found it to be an in-depth environmental review of the project and mitigation measures. We commend the MAC for an extensive public engagement process during preparation of the LTCP, and with the development of the Stakeholder Engagement Plan during preparation for the EA/EAW. Washington County Public Works participated in this process which provided a unique opportunity for input – addressing environmental issues prior to completion of the EA/EAW.

April 19, 2018

Washington County Comments on EAW for Lake Elmo Airport  
Metropolitan Airports Commission (MAC)

Based on review of the document, we offer the following comments:

**33** | Section 4.4.4 Washington County Zoning  
In 2016, Washington County amended the Washington County Comprehensive Plan 2030, removing land use authority in West Lakeland Township with the exception of The St. Croix River District and Mining. West Lakeland Township has adopted the Washington County Development Code or a version similar to the document.

**34** | Section 4.5.5 Watersheds  
The EAW acknowledges that the Airport is in the Valley Branch Watershed District (VBWD) and all rules and regulations of the district must followed. Once the design plan has been completed for the project, the MAC must submit the drainage report and calculations for review of any downstream impacts to the county drainage system. Along with the drainage calculations, written conclusions explaining that the volume and rate of stormwater run-off into any county right-of way will not increase as part of the project.

If the comments in this letter are addressed in the EAW, the county does not feel the need for the preparation of an Environmental Impact Statement for the planned project; however, future studies, environmental documentation, and mitigation measures will need to be addressed as development occurs in the area.

If there are any questions or comments to the responses on the EA/EAW, please contact Senior Planner Ann Pung-Terwedo at [Ann.pung-terwedo@co.washington.mn.us](mailto:Ann.pung-terwedo@co.washington.mn.us).

Sincerely,



Wayne Sandberg  
Deputy Director/ County Engineer

Cc: Molly O'Rourke, County Administrator  
Don Theisen, Director, Public Works  
Jan Lucke, Planning Division Manager  
Ann Pung-Terwedo, Senior Planner

April 19, 2018

Chad Leqve  
Metropolitan Airports Commission  
6040 South 28<sup>th</sup> Avenue  
Minneapolis, MN 55450

Re: Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet

Dear Chad Leqve:

Thank you for the opportunity to review and comment on the Environmental Assessment/Environmental Assessment Worksheet (EA/EAW) for the Lake Elmo Airport project (Project) in Lake Elmo, Washington County, Minnesota. The Project consists of relocation and extension of runways and associated activities. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility or other interests, the MPCA staff has the following comments for your consideration.

**Chapter 5, Environmental Consequence**

**35** On table 5-6, page 5-33, the MPCA Clean Water Act Section 401 Water Quality Certification should be moved from the Stormwater section to the Wetland section under the U.S. Army Corps of Engineers 404 permit. In addition, an antidegradation assessment should be included as part of the 401 certification.

**Chapter 4, Affected Environment**

**36** As noted in the EA/EAW, the MPCA declared two of the lakes within a two-mile radius of the airport as impaired, Lake Elmo and Downs Lake. The Lake Elmo Airport's drainage flows into Downs Lake. For any water conveyance that may flow into the impaired waters, in-water best management practices such as silt curtain, construction during no/low flow periods, winter conditions, and the most appropriate type of coffer or check dams to minimize total suspended solids, must be implemented.

We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impact Statement. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EA/EAW, please contact me by email at [Karen.kromar@state.mn.us](mailto:Karen.kromar@state.mn.us) or by telephone at 651-757-2508.

Sincerely,



Karen Kromar  
Project Manager  
Environmental Review Unit  
Resource Management and Assistance Division

KK:bt

cc: Dan Card, MPCA, St. Paul  
Bill Wilde, MPCA, St. Paul  
Teresa McDill, MPCA, St. Paul  
Ken Westlake, EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 19 2018

REPLY TO THE ATTENTION OF:

Chad Leqve  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue South  
Minneapolis, Minnesota 55450

**Re: Draft Environmental Assessment for the Lake Elmo Airport Project, Lake Elmo, Minnesota**

Dear Mr. Leqve:

The U.S. Environmental Protection Agency received the Draft Environmental Assessment (EA) regarding a runway extension and road relocation at Lake Elmo Airport in Lake Elmo, Minnesota. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council of Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Metropolitan Airports Commission, in coordination the Federal Aviation Administration, proposes to relocate and lengthen Runway 14/32 at the Lake Elmo Airport. The preferred alternative will also require an adjacent local road to be reconfigured to accommodate the relocated runway.

Based on emails between you and Elizabeth Poole of my staff, we understand that the most accurate depiction of the preferred road alternative can be found in Figure 3-3. The figures depicted in Figure 3-6 do not include the revised preferred alternative for the runway and do not accurately reflect the preferred road alternative.

EPA provided scoping comments on February 27, 2017. We appreciate that most of our comments have been incorporated into Draft EA. We continue to recommend any mitigation measures be committed to in the Finding of No Significant Impact (FONSI). Based on our review of the Draft EA, we have the following comments:

**Groundwater**

37

The Draft EA indicates that any groundwater monitoring wells will be not be impacted or need to be moved by the preferred alternative. Please note that if monitoring wells need to be removed for either this or future projects, we recommend that they be properly sealed and replaced, and that any work be coordinated with the Minnesota Pollution Control Agency (MPCA).



38

**Consultation and Coordination**

Please continue to coordinate MPCA regarding potential interactions with the monitoring wells or the Baytown Township plume. We also recommend continued coordination with the Minnesota Department of Transportation about impacts related to the relocation of the road, including levels of service, safety, road geometry, and community outreach.

Thank you for the opportunity to comment on the Draft EA. We look forward to receiving the FONSI. If you have any questions, please contact me or Elizabeth Poole of my staff at (312) 353-2087 or via email at [poole.elizabeth@epa.gov](mailto:poole.elizabeth@epa.gov).

Sincerely,



Kenneth A. Westlake  
Chief, NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

Cc: Josh Fitzpatrick, Federal Aviation Administration, Minneapolis Airports District Office (via email)  
Michele Mabry, Minnesota Pollution Control Agency (via email)  
Debra Moynihan, Minnesota Department of Transportation (via email)

# THOMAS E. CASEY

Attorney at Law  
2854 Cambridge Lane  
Mound, MN 55364  
(952) 472-1099  
tcasey@frontiernet.net

April 17, 2018

Lake Elmo Airport EA/EAW Comments  
c/o MAC Environment Department  
6040 28th Avenue  
South Minneapolis, MN 55450

VIA E-MAIL and U.S. MAIL  
ContactLakeElmoAirportEA@mspmac.org

RE: **Comments to Draft Federal Environmental Assessment (EA)/ State of Minnesota Environmental Assessment Worksheet (EAW)**  
Lake Elmo Airport Runway 14/32 Relocation/Extension and Associated Improvements  
Washington Co., MN

Dear Metropolitan Airports Commission,

39 On behalf of West Lakeland Township, I must first state that an **Environmental Impact Statement (EIS) is mandatory** because the project is “For construction of a paved and lighted airport runway of 5,000 feet of length or greater ...” (Minnesota Rule 4410.4400, Sub. 15.) The proposed project paves and lights two runways, runway 14/32 (3,500 feet) and runway 4/22 (2,750 feet), totaling 6,250 feet. Minnesota Rule 4410.4400, Subp. 1, states in part, “**Threshold test.** ... Multiple projects and multiple stages of a single project that are connected actions or **phased actions** must be considered **in total** when comparing the project ... to the thresholds of this part.” [Emphasis added.] Minnesota Rule 4410.0550, Subp. 60 defines “phased action as: “... two or more projects to be undertaken by the same proposer that ... A. will have environmental effects in the same geographic area ...” Therefore, the two runways must be considered in total and, as result, exceed the 5,000 feet threshold for a mandatory EIS.

40 A mandatory EIS requires that the EAW “... be the basis for the scoping process ...” and that the scoping process be commenced pursuant to the requirements of Minnesota Rule 4410.2100.

41 In the alternative, in the event the court rules that an EIS is not mandatory for this project, on behalf of West Lakeland Township, I submit the following comments to the Draft Federal Environmental Assessment (EA)/ State of Minnesota Environmental Assessment Worksheet (EAW) for the proposed Lake Elmo Airport Runway 14/32 Relocation/Extension and Associated Improvements, in Washington County, Minnesota.

41

The West Lakeland Township Board of Supervisors is very concerned about the impacts the proposed Lake Elmo Airport Runway Expansion would bring to the area. While West Lakeland Township acknowledges Metropolitan Airport Commission's (MAC) efforts to date with regard to this project, the Board of Supervisors respectfully requests that MAC – as the Responsible Governmental Unit (RGU) – order a full Environmental Impact Statement (EIS) for this project so that all of its impacts can be analyzed and understood. An EIS is the only way for MAC officials to make a fully informed decision.

42

The EA/EAW is the appropriate “tool” to obtain a “snap shot” of a project and the impacts it will bring. West Lakeland Township insists, however, that because of the proposed project's scope, immediate, and cumulative impacts, as well as its proximity to sensitive natural resources, the project possesses the potential for significant environmental effects and warrants the detailed review and scrutiny that only an EIS can provide.

43

West Lakeland Township asserts it is worth reviewing the environmental review procedures outlined in the Minnesota Environmental Policy Act (“MEPA”). Therefore, I have respectfully included background information (please see Sections I – III below), along with other practical benefits of ordering an EIS (please see Section VII below).

In addition, detailed comments are provided that reference specific sections of the EA/EAW for this project. (Please see Section IV below.)

44

Finally, PLEASE TAKE NOTICE that West Lakeland Township will be filing a Notice of Intervention as an intervening party in the proceeding, pursuant to the Minnesota Environmental Rights Act (Minnesota Statute 116B.09).

#### **I. THE PURPOSE OF ENVIRONMENTAL REVIEW.**

The purposes of the Minnesota Environmental Policy Act (“MEPA”), Minnesota Statute Chapter 116D, are stated in Minn. Stat. 116D.01:

45

- “(a) to declare a state policy that will encourage the productive use and enjoyable harmony between human beings and their environment;
- “(b) to promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of human beings; and
- “(c) **to enrich the understanding of the ecological systems and natural resources important to the state and to the nation.**” [Emphasis added.]

The importance of environmental review is best described in paragraph (c) above.

The Minnesota Environmental Quality Board (in Minn. Rule 4410.0300, Subp. 3) elaborates on the purposes of environmental review:

“The Minnesota Environmental Policy Act recognizes that the restoration and maintenance of environmental quality is critically important to our welfare. The act also recognizes that **human activity has a profound and often adverse**

**impact on the environment.**

“A **first step** in achieving a more harmonious relationship between human activity and the environment **is understanding the impact which a proposed project will have on the environment.** The purpose of ... [the EQB rules] ... is to aid in providing that understanding through the preparation and public review of environmental documents.” [Emphasis added.]

Minn. Rule 4410.0300, Subp. 4, outlines the objectives of environmental review:

- “A. provide usable information to the project proposer, governmental decision makers and the public concerning the primary environmental effects of a proposed project;
- “B. provide the public with systematic access to decision makers, which will help to maintain public awareness of environmental concerns and encourage accountability on public and private decision making; ...”

“MEPA’s procedures require government bodies to consider the significant environmental consequences of a project ‘**to the fullest extent practicable.**’ Minn. Stat. 116D.03, subd. 1.” Iron Rangers For Responsible Ridge Action v. Iron Range Resources, Inc. 531 N.W.2d 874, 880 (Minn. App. 1995), review denied.

**II. THE PURPOSES OF AN EAW AND AN EIS ARE CLEARLY DIFFERENT.**

**A. PURPOSE OF AN EAW.**

Minnesota Statute 116D.04, Subd. 1a (3), defines an Environmental Worksheet as “... a **brief document** which is designed to set out the basic facts necessary to determine whether an environmental impact statement is required for a proposed action.” (Emphasis added.) See also Bolander v. City of Minneapolis 502 N.W. 2d 203, 206 (Minn. 1993); and Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995).

“Whereas the **EAW is not intended to be a detailed analysis** of potential environmental impacts of a proposed project, the EIS is a much more detailed study of all factors contributing to a significant impact on the environment.” (Emphasis added.) Iron Rangers For Responsible Ridge Action v. Iron Range Resources, Inc. 531 N.W.2d 874, 880 (Minn. App. 1995), review denied.

Minnesota Rule 4410.1000, Subpart 1, states, “The EAW is a **brief document** prepared in worksheet format which is designed to rapidly assess the environmental effect which may be associated with a proposed project. The EAW serves primarily to:

- A. aid in the determination of whether an EIS is needed for the proposed project; and
  - B. serve as a basis to being the scoping process for an EIS.”
- (Emphasis added.)

**B. PURPOSE OF AN EIS. (THE RGU CANNOT ABANDON ITS DUTY TO ORDER AN EIS BY DEFERRING ISSUES TO PERMIT PROCESSES.)**

“The purpose of an EIS is to provide information to evaluate proposed actions that have the potential for significant environmental effects, to consider alternatives to the proposed actions, and to explore methods for reducing adverse environmental effects. Minn. Rule 4410.2000, Subp. 1.” MCEA v. MPCA 644 N.W. 2d 457, 462 (Minn. 2002).

47

“The very purpose of an EIS ... is to determine the potential for significant environmental effects *before they occur*. **By deferring this issue to later permitting and monitoring decisions, the [RGU] abandoned [its] duty** to require an EIS where there exists a potential for significant environmental effects.” (Emphasis added.) See Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995). See also Pope County Mothers v. MPCA 594 N.W.2d 233, 237-238 (Minn. App. 1999).

**C. AN EAW CANNOT SUBSTITUTE FOR AN EIS.**

Even though some governmental units have treated an EAW in practice as a substitute EIS, that is not the legal function of an EAW. “From my discussions with various administrators working on environmental review, the consensus seems to be that the content of EAWs tends to be more intensive than perhaps the statute intended.” [Bettison, Stacy L., “The Silencing of the Minnesota Environmental Policy Act: The Minnesota Court of Appeals and the Need for Meaningful Judicial Review.” 26 William Mitchell Law Review, 967, 976 (2000).]

48

As the Court of Appeals has stated, “The record in this case exemplifies the need for careful evaluation and differentiation between the purpose served by an EAW and that served by an EIS.” See Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995).

In other words, an **EA/EAW, even with appendices, is not a substitute for an EIS.**

**III. THE PURPOSE AND CONTENT OF PUBLIC COMMENTS TO THE EAW.**

Minnesota Rule 4410.1600 states in part, “The comments shall address the accuracy and completeness of the material contained in the EAW, potential impacts that may warrant further investigation, and the need for an EIS ...” [Emphasis added.]

As described below, the Lake Elmo Airport Expansion EA/EAW is inaccurate and incomplete. In that event, Minn. Rule 4410.1700, Subpart 2a, states that if information is lacking, but could be reasonably obtained, the RGU shall either: (1) make a positive declaration for an EIS and include the lacking information as part of the EIS scope; or (2) postpone the decision on the need for an EIS up to 30 days to obtain the lacking information.

49

For the reasons stated below, the “lacking” information must be part of the EIS scoping document.

However, even if the EA/EAW is inaccurate or incomplete in its present form, the presently known facts in this case satisfy the criteria for an EIS. The itemized comments in

49 | Section IV below describe what information is “lacking” and explain why an EIS must be ordered.

#### IV. ITEMIZED COMMENTS TO EA/EAW

50 | The following comments will show that the Draft EA/EAW is **both inaccurate and incomplete**. Furthermore, as previously stated, the nature scope of the project has the “**potential for significant environmental effects**” and, **consequently, requires an Environmental Impact Statement (EIS)**.

51 | Please note: The numbering of the West Lakeland Township’s comments corresponds to the pages and paragraphs in the Draft EA/EAW and its Appendices.

51 | CAVEAT: The absence or omission of my client’s comment on any statement in the Draft EAW/EA shall **not** be deemed an agreement with, or admission of, the draft EAW/EA statement.

#### Page 2-2, paragraph 1:

52 | The EA/EAW contends that the pavement condition index (PCI) for the runways is 41-60, either “poor” or, marginally, “fair.”

52 | However, the main runway (14/32) was resurfaced two years ago and Airnav rates both Lake Elmo runways as in “good condition” – which is a PCI of rating of 86-100. [See <http://www.airnav.com/airport/21D> last visited 3/30/18).]

The EA/EAW is inconsistent with the Airnav rating and must be reconciled.

#### Page 2-2, paragraph 1:

53 | The EA/EAW states, “As such, in this case the proposed action should include replacing the pavement for **both** runways, as well as their associated parallel and connector taxiways, to facilitate continued use of the runways throughout a 20-year design life.” This statement includes more work than contained in the \$15,325,000 “Preferred Alternative Cost Estimates” contained in Table ES-2 of the Lake Elmo Airport 2035 Long Term Comprehensive Plan (LTCP). This inconsistency must be reconciled.

#### Page 2-4, paragraph 1:

54 | The EA/EAW states, “Lake Elmo Airport is bordered by the Union Pacific Railroad to the north, County State Aid Highway (CSAH) 15 (Manning Avenue North) to the west, and 30th Street North to the south, all of which enter the Runway 14/32 RPZs as shown on Figure 2.2.”

54 | The FAA document entitled, “FAA Airport Division – Runway Protection Zones 550,” states on page 2, last paragraph, “**FAA Recommendation** ... Airports that do not own the entire RPZ should consider the need to acquire such land if there is **any possibility** that incompatible land uses **could** occur within the RPZ.” [Emphasis added.]

The EA/EAW should explain why MAC did not purchase property on the west side of Manning Avenue to alleviate the incompatibility. The EA/EAW is incomplete without including an analysis of the cost and environmental impacts of this acquisition.



**Page 2-4, last paragraph:**

55

The EA/EAW states, “The operational fleet at Lake Elmo Airport consists of propeller-driven aircraft that weigh less than 12,500 pounds and have fewer than 10 passenger seats. FAA AC 150/5325-4B states that the length of primary runways intended for aircraft weighing less than 12,500 pounds should be designed based on a family grouping of small airplanes. The critical aircraft for determining runway length is ‘the listing of airplanes (or a single airplane) that results in the longest recommended runway length.’”

MAC is inaccurate because the planes that MAC is referencing (turbo prop and multi-piston aircraft) are at the top end of this category (listed on page 2-6, Table 2.2). None of these planes are at the Lake Elmo Airport today.

**Page 2-7:**

56

Chart 2.1 shows the “Average Required Lengths” for aircraft listed on page 2-6, Table 2.2. By averaging, it makes the distances look better. Referencing the Lake Elmo Airport 2035 Long Term Comprehensive Plan (LTCP), the Accelerate/Stop (A/S) distance for the Pilatus PC-12 is 3,677 feet. Again, referencing the Lake Elmo Airport 2035 LTCP, the A/S distance for the Cessna 421 is 4,210 feet. For a Cessna 414m the A/S distance is 4,900 feet. Averaging makes it look better for 3,500 feet but, when you look at individual aircraft, the numbers don’t add up for these aircraft.

**Page 2-8:**

57

Table 2-3 references critical aircraft using the cross wind runway. According to EA/EAW (page 2-7), the crosswind runway is planned to be extended to 2,750 feet. However, the first five aircraft listed on table 2-3 have “takeoff distance requirements” that exceed 2,750 feet.

The EA/EAW is inadequate by not explaining why the cross wind runway should not be extended now to accommodate all of the aircraft listed in table 2-3. [Note: The 2008 Lake Elmo Airport Long Term Comprehensive Plan considered 3,200 feet. Why not now?]

**Page 3-2:**

58

Paragraph 3.2 states: “**1) Avoid or Minimize Changes to Airport Use and Aircraft Flight Patterns.** Alternatives that would substantially change airport use or aircraft flight patterns are not considered reasonable or feasible by this EA/ EAW.” In fact, MAC is targeting larger Critical Aircraft (in the 10 passenger and under category), that are not at the airport today. If the larger planes are allowed to come, which will occur if the project is approved, this will “substantially change the airport use.” The EA/EAW is incomplete without addressing this problem.

**Page 3-2:**

59

Paragraph 3.2 also states: “**3) Avoid or Minimize Land Acquisition.** Because alternatives exist that would meet the purpose and need without requiring land acquisition, alternatives that would require land acquisition are not considered reasonable or feasible by this EA/EAW.”

West Lakeland Township’s research found that it would cost between \$95,000 and \$125,000 to purchase a 0.2 acre lot along Manning Avenue for a buildable city lot. The City of Lake Elmo owns the entire drainage area (~13.2 acres) south of the railroad tracks along

59

Manning Ave, which includes the current runway protection zone (RPZ) area. West Lakeland Township estimates that the RPZ area south of the railroad tracks and west of Manning Avenue is approximately 6.3 acres. West Lakeland Township contends that the drainage pond area (an unbuildable area) would cost considerably less to purchase than a buildable city lot and a tremendous amount less than building a new runway to meet the FAA’s Runway Protection Zones 550 Memo, which states; “**Airports that do not own the entire RPZ should consider the need to acquire such land if there is any possibility that incompatible land uses could occur within the RPZ”.**

 [Emphasis added.]

**Page 3-2:**

60

Paragraph 3.2.1 states: “1) does not meet the runway length needs of Airport users ...”  
The EA/EAW is incomplete because it does not contain information to support this assertion. In fact the runway length does meets the needs of the users based there today.

**Page 3-3, last paragraph:**

61

The EA/EAW states, that the Lake Elmo Airport “... is not the only reliever airport in Washington County ...” The EA/EAW is inaccurate by not considering the airports in Forest Lake (Washington County), South St. Paul, and New Richmond, Wisconsin, airports that serve the east metro region.

**Page 3-4:**

62

Table 3-1 pertains to alleged “drive distance and times from Lake Elmo Airport to other airports. Please see the letter from Mr. Stuart Grubb, PG, attached as **Exhibit 1**, where drive time issues are explained on the last page.

**Page 3-4, last paragraph:**

63

The EA/EAW states, “... use of alternate existing airports in lieu of improving Lake Elmo Airport ... would not ... 2) enhance safety for Airport users and neighbors ...” The EA/EAW is incomplete and must explain how it is safe for neighbors, where larger aircraft will be able to use an expanded Lake Elmo Airport.

**Page 3-8, paragraph 1:**

64

The EA/EAW states: “This alternative also designates Runway 14/32 as a ‘utility’ runway for aircraft less than 12,500 pounds, which reduces the size of the RPZs.”

In fact, the RPZ at Lake Elmo is currently designated as a “utility” runway. The EA/EAW makes it appear that MAC is reducing the RPZ size, which they are not. This false impression must be rectified.

**Page 3-9, Figure 3.3:**

65

Item #14 on figure 3.3 references a new “on-Airport access road.” Although this map doesn’t show it, the north entrance on to Manning Avenue is being closed. All vehicles then must pass in front of the row 13 hangers or on “Alpha” Street. This can’t be safe and it must be assumed that the hanger owner wouldn’t approve of this plan. While row 13 or Alpha Street is not referenced in Fig 3-3 it, it is referenced in a document entitled “Manning Avenue (CSAH 15) Corridor Management and Safety Improvement Project” (SRF No. 8141.00).

**Page 3-14:**

66

Figure 3-5 does not agree with contours in the Lake Elmo Airport 2035 Long Term Comprehensive Plan (page xvii, Figure ES-6). The EA/EAW is inadequate and incomplete when it fails to explain the difference and why Figure 3-5 does not contain the 55 DNL contour, as depicted in the ES-6 figure.

Note also: The same ES-6 figure is referenced in Figures 5-2 and 5-5 in the Lake Elmo Airport 2008 Long Term Comprehensive Plan.

**Page 3-17:**

67

Paragraph 1 states, "... the design speed for the relocated roadway would be reduced from 45 to 30 miles per hour" This is not correct; it should be 55 miles per hour instead of 45.

Paragraph 1 also states, "This alternative does not introduce any new intersections or **turning movements** for through traffic on 30th Street." [Emphasis added.] The EA/EAW is incomplete by failing to explain why two new curves on 30th Street are not "turning movements."

It should also be noted that Washington County's proposed 2040 Comprehensive Plan has changed 30<sup>th</sup> Street to a "major collector" road. The EA/EAW is inadequate by not addressing this change.

**Page 3-18, Figure 3-7:**

68

In the "Alternative B2" drawing, and also in the "Appendix B – 30<sup>th</sup> Street Realignment Alternative Review", both drawings indicate that the realigned section of 30<sup>th</sup> Street is in the MnDOT Clear Zones. These clear zones are 500 feet by 1,000 feet by 800 feet. The EA/EAW is incomplete by failing to describe how this conflict will be addressed.

**Page 3-21:**

The EA/EAW states under "Environmental Factors – Tree Removal" – "The no action alternative includes removal of any on-Airport trees that penetrate these surfaces for both runways." The EA/EAW is incomplete and inadequate for failing to explain why these trees have not been removed before now. It appears MAC has not been responsible until an EA/EAW was commenced.

69

The EA/EAW states under "Land Use": "Before completing the EA/EAW process, the MAC will start convening a Joint Airport Zoning Board (JAZB) under Minnesota Statutes Chapter 360". The EA/EAW is inadequate and incomplete by failing to explain why a JAZB was not created before now, as required in 1997 and 2008 Lake Elmo Airport Long Term Comprehensive Plans, when the problems were easier to rectify than today.

The EA/EAW also states under "Land Use": "This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state's model zoning ordinance." The EA/EAW is inadequate and incomplete for failing to analyze and explain how the likely deviations from the state model zoning ordinance may affect safety and the whether or not the likely deviations have the potential for significant environmental effects.

**Page 3-22:**

70

The EA/EAW states, "**Install obstruction lighting.** Various existing on-Airport structures would penetrate the departure threshold siting surfaces for all three alternatives. Based on consultation with FAA, installing steady-burning red obstruction lights on top of these

structures would mitigate these penetrations and is proposed for all on-Airport structures penetrating the departure threshold siting surfaces.”

The EA/EAW is inadequate because it fails to consider lighting impacts for off-airport property in Model Safety Zone A (proposed runway): Jim Aronson’s property at 2724 Neal Ave. N.; two lots south of Mr. Aronson (that are for sale); the two corner lots at 30<sup>th</sup> and Manning Ave. (also for sale); and half of 2933 Manning Ave. Also included in Model Safety Zone A are portions of 2654, 2665, 2675, 2733, 2795, and 2825 Neal Ave. and half of 2933 Manning Ave.

In addition, the EA/EAW fails to consider lighting impacts on the following property in “Model Safety Zone B”: all of 2595 Neal Ave. and 13260 26<sup>th</sup> Street; the majority of 2521 Neal Ave.; portions of 2401 and 2481 Neal Ave.; 13170 and 13178 26<sup>th</sup> Street Ct.; and portions of 2725, 2785, 2815 and 2875 Manning Ave. and half of 2933 Manning Ave. There are at least seven properties in Baytown and six in Lake Elmo that are in Zone B.

Finally, in a MnDOT Aviation presentation on June 10, 2015, they referenced the year 1973 that “Airport zoning made a condition for receiving federal and state funding”. No airport zones are in effect at Lake Elmo today.

**Page 3-23:**

The EA/EAW states: “**Logistical Factors.** Washington County plans to widen Manning Avenue North from two to four lanes within the next five years. This local project would trigger an FAA RPZ alternatives review because of the additional travel lanes and/or turn lanes are planned within the Runway 14 RPZ.”

According to a Washington County document, this area is planned for expansion in 5 years, but, in discussions with West Lakeland Township officials, it is more likely 5-8 years out. The EA/EAW inaccurately implies that a FAA RPZ review is a bad thing. This should be clarified. [Reference: <https://www.co.washington.mn.us/DocumentCenter/View/15030> (last visited 4/6/18).]

**Page 3-29:**

Table 3-3 states under the “No-action Alternative” – “Future Manning Avenue widening will trigger FAA RPZ review.” Again, the EA/EAW inaccurately implies that a FAA RPZ review is a bad thing. The EA/EAW is incomplete without addressing this inaccuracy.

**Page 4-5:**

Table 4-1 lists 14,561 “military” operations, which are over one-half (55%) of the total operations. The EA/EAW is inadequate and incomplete by failing to state the methodology by which the military – and the “air taxi operations” (1,147 or 4%) – are recorded and verified. It is worthy to note that the remaining operations are (~41%) is local air traffic.

Paragraph 1 states; “Runway design standards are based on a single aircraft or family of aircraft that regularly uses the runway and accounts for 500 annual operations not including touch-and-go operations.” The EA/EAW is inadequate and incomplete because it fails to state how many of the 11,900 remaining operations are touch and goes.

Finally, West Lakeland Township spoke with a Civil Air Patrol (CAP) person, who stated that they are not allowed to do “touch and goes” and that there is no way they have 14,000 operations at Lake Elmo.

**Page 4-13:**

74 | The EA/EAW state in paragraph 2: “This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state’s Model Zoning Ordinance.” The EA/EAW is inadequate and incomplete by failing to analyze the safety and environmental impacts of the likely deviations from the state’s Model Zoning Ordinance.

**Page 4-27:**

75 | Paragraph 4 states in part: “Current agricultural production (on airport property) includes corn and soybean on a rotational basis.” The EA/EAW fails to note that agriculture attracts geese and hunters. Eagles, turkey vulture, swans and sandhill cranes have also been seen on agricultural portion of property. [See photos attached as **Exhibit 2** (geese, located on the west side of Manning Ave.); **Exhibit 2A** (sandhill cranes, located south of 30<sup>th</sup> St.); and **Exhibit 2B** (trumpeter swans, located south of 30<sup>th</sup> St.)]

**Page 5-6:**

76 | The last two paragraphs discuss tree removal. The EA/EAW is inadequate and incomplete by failing to analyze the impacts of the tree removal as habitat for species other than the northern long-eared bat.

**Page 5-9:**

77 | The last paragraph references a “Farmland Conversion Impact Rating” and a point score. West Lakeland Township asserts that the Farmland Conversion Impact Rating is too low and so does the Department of Agriculture, when the township contacted them. The number of row crop acres to be removed is more than stated, plus there are acres to be converted from row crops to rusty patched bumblebee habitat flowers. (Reference: Appendix G, on the bottom map of pdf page 465.) The Green area cannot be the only area counted for removal of crop land. Farmers do not like to plant row crops in irregular shapes or around tight curves. Furthermore, based on Figure 4-8, West Lakeland Township calculates that areas that are currently mowed for hay production, that will be removed, is estimated to be approximately 50 plus acres. In sum, the EA/EAW is inaccurate and incomplete.

**Page 5-12:**

78 | Paragraph 5.9.1, subparagraph 1 states in part: “The preferred alternative would move the Runway 14 threshold approximately 750 feet east-northeast and move the Runway 32 threshold approximately 1,200 feet east-southeast. Visual flight rules (VFR) traffic pattern airspace at the Airport would extend 1.5 nautical miles (9,114 feet) laterally and longitudinally from the runway endpoints under both the no-action and preferred alternatives. Because the preferred alternative would not substantially alter the VFR traffic pattern airspace, impacts to surrounding land uses are minimal.”

In fact, this option moves the runway closer to and the safety zones over existing homes. The EA/EAW is inaccurate by describing this option as having “minimal” impact. The EA/EAW is incomplete by not describing the actual impacts to the “quality of life” of new and existing homes. (Reference: Lake Elmo Airport 2035 Long Term Comprehensive Plan, Tables 7-4, 7-5, and Figure 7-4.)

**Page 5-12:**

79 Paragraph 5.9.1, subparagraph 2, states in part, “Before completing the EA/EAW process, the MAC will start convening a Joint Airport Zoning Board.” A Joint Airport Zoning Board (JAZB) was never created as required in past Long Term Comprehensive Plans and as direct by the Metropolitan Council. The EA/EAW is inadequate and incomplete by not describing why. West Lake Township asserts that we would not have the problems today if a JAZB had been created before this time.

Paragraph 5.9.1, subparagraph 2 also states, “This process may result in a zoning ordinance recommendation to the MnDOT Office of Aeronautics that deviates from the state’s Model Zoning Ordinance.” This may the same as no ordinance or making what exists today fit. One again, West Lake Township asserts that the EA/EAW is inadequate and incomplete for failing to analyze and explain how the likely deviations from the state model zoning ordinance may affect safety and the whether or not the likely deviations have the potential for significant environmental effects

80 **Page 5-13:**

Paragraph 1 describes traffic count, accomplished in the summer when school was out. The EA/EAW is inadequate and incomplete until a traffic count is accomplished when school is in session.

**Page 5-14:**

Paragraph 1 states in part, “Canada geese are increasing in numbers because of suburban development near the Airport, which includes a new storm water retention pond and open space.”

Based on FAA Advisory Circular No. 150/5200-33b, airports that have received federal grant-in-aid assistance must use the following standards. The EA/EAW is inadequate and incomplete without describing whether or not the proposed project complies with these standards:

81 **“1-2. AIRPORTS SERVING PISTON-POWERED AIRCRAFT.** Airports that do not sell Jet-A fuel normally serve piston-powered aircraft. Notwithstanding more stringent requirements for specific land uses, the FAA recommends a separation distance of 5,000 feet at these airports for any of the hazardous wildlife attractants mentioned in **Section 2** or for new airport development projects meant to accommodate aircraft movement. This distance is to be maintained between an airport’s AOA and the hazardous wildlife attractant ...”

[Emphasis added.]

**SECTION 2. LAND-USE PRACTICES ON OR NEAR AIRPORTS THAT POTENTIALLY ATTRACT HAZARDOUS WILDLIFE.**

**2-1. GENERAL.** The wildlife species and the size of the populations attracted to the airport environment vary considerably, depending on several factors, including land-use practices on or near the airport. This section discusses land-use practices having the potential to attract hazardous wildlife and threaten aviation safety. In addition to the specific considerations outlined below, airport operators should refer to Wildlife Hazard Management at Airports, prepared by FAA and U.S. Department of Agriculture (USDA) staff. (This manual is available in English, Spanish, and French. It can be viewed and



downloaded free of charge from the FAA’s wildlife hazard mitigation web site: <http://wildlife-mitigation.tc.FAA.gov>). And, Prevention and Control of Wildlife Damage, compiled by the University of Nebraska Cooperative Extension Division. (This manual is available online in a periodically updated version at: [ianrwww.unl.edu/wildlife/solutions/handbook/](http://ianrwww.unl.edu/wildlife/solutions/handbook/).)”

The paragraph below is transcribed from Section 2-3 – Water Management Facilities:

“b. **New storm water management facilities.** The FAA strongly recommends that off airport storm water management systems located within the separations identified in Sections 1-2 through 1-4 be designed and operated so as not to create aboveground standing water. Stormwater detention ponds should be designed, engineered, constructed, and maintained for a maximum 48-hour detention period after the design storm and remain completely dry between storms. To facilitate the control of hazardous wildlife, the FAA recommends the use of steep-sided, rip-rap lined, narrow, linearly-shaped water detention basins. When it is not possible to place these ponds away from an airport’s AOA, airport operators should use physical barriers, such as bird balls, wires grids, pillows, or netting, to prevent access of hazardous wildlife to open water and minimize aircraft-wildlife interactions. When physical barriers are used, airport operators must evaluate their use and ensure they will not adversely affect water rescue. Before installing any physical barriers over detention ponds on Part 139 airports, airport operators must get approval from the appropriate FAA Regional Airports Division Office. All vegetation in or around detention basins that provide food or cover for hazardous wildlife should be eliminated. If soil conditions and other requirements allow, the FAA encourages the use of underground storm water infiltration systems, such as French drains or buried rock fields, because they are less attractive to wildlife.”

81

**Page 5-16:**

The EA/EAW is inaccurate and incomplete by failing to explain why the noise contours keep changing from publication to publication. For example, Fig. 5-6 in the Lake Elmo Airport 2008 Long Term Comprehensive Plan and Figure ES-6 in the Lake Elmo Airport 2035 Long Term Comprehensive Plan, differs from the EA/EAW, Figure 5-2.

In referencing Figure 5-2 in Lake Elmo Airport 2008 Long Term Comprehensive Plan, West Lakeland Township asserts that they are within the “Small Town–Quiet Suburban” setting, which is in the 45-55 DNL range. Even if West Lakeland Township is considered a “Suburban Low Density” setting, they fall within the 52-60 DNL range, per fig. 5-2 in the Lake Elmo Airport 2008 Long Term Comprehensive Plan.

The EA/EAW is also inadequate and incomplete by failing to analyze how the removal of 25 acres of trees increases noise and light pollution.

82

**Page 5-17:**

Paragraph 5.12 states in part, “... a land release from the Federal Aviation Administration (FAA) to allow realignment of 30th Street North near the new Runway 32 Runway Protection Zone (RPZ) to reconnect with the existing Neal Avenue North intersection.” The EA/EAW is incomplete by failing to state why the FAA needs to release the land, whether or the release is legally required, and the socio-economic and environmental impacts if they do not.

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83

The last paragraph states in part, “There are no low-income or minority populations near the project, and therefore no environmental justice impacts associated with either the no-action or preferred alternatives.” The EA/EAW is inaccurate and incomplete by failing to analyze the impacts of the quality of life for the residents of the area.

**Page 5-23:**

84

Paragraph 3 states in part, “As of November 27, 2017, the Minnesota Board of Water and Soil Resources (BWSR) website indicates there are sufficient available wetland bank credits to mitigate for wetland impacts associated with the preferred alternative. The available wetland credit types correspond to the wetlands impacted by the preferred alternative and exceed the required mitigation for each wetland type. Purchase of wetland bank credits would occur after the exact wetland impact area is determined during design engineering, a process which may slightly change the estimated wetland impact and consequent wetland credit need.”

The EA/EAW is inadequate by failing describe and analyze the sequencing requirements of the Wetland Conservation Act (Minn. Rule 8420.0520 et seq.)

**Page 5-25:**

85

Paragraph 5.14.2 states in part, “However, approximately 300,000 square feet of existing impervious surface will also be removed.” The EA/EAW is incomplete by failing to describe where this amount of impervious surface being removed and failing to provide the calculations supporting the assertion that 300,000 square feet of existing impervious surface will be removed.

**Page 5-28:**

86

Paragraph 5.14.3 references the FEMA floodplain. The realigned section of 30<sup>th</sup> Street is in 100-year flood plain. The FEMA floodplain map and the Valley Branch Watershed District 100-year floodplain maps differ. The EA/EAW is inaccurate and incomplete by failing to reconcile this difference and by failing to support the calculation that the total wetland fill footprint is only 0.06 acre.

**Page 5-29:**

87

Paragraph 5.14.4 (“Other Water Resources”) states in part, “The preferred alternative does not have potential impacts for water bodies listed as impaired.” In MAC’s “Assessment of Environmental Effects – Seven-Year Capital Improvement Program 2018-2025”, it states on page 13 they are constructing a salt storage shed at Lake Elmo. The EA/EAW is incomplete by failing to discuss the environmental impacts of this storage shed.

**Comments to EA/EAW Appendix**

**Appendix A – Runway Length Needs Determination**

**Page A-2:**

88

The Metropolitan Airport Commission’s Noise and Operations Monitoring System (MACNOM) has 39 monitoring sites around the Minneapolis - St. Paul Airport. Site 9 is the closest site to Lake Elmo, which is approximately 15 nautical miles away. The EA/EAW is inaccurate and incomplete without explaining aircraft from Minneapolis-St. Paul, approximately 3.5 nautical miles away, and from St. Paul, approximately nautical miles away, would not

overwhelm the small planes operating at Lake Elmo Airport. The EA/EAW is incomplete without describing the accuracy of the system.

Paragraph 3, provides a tally of on-site observations at Lake Elmo Airport during a two-week period in December, 2011 and a one-week period in /august, 2012. The first bullet states: “Average daily aircraft operations were 52 in December 2011 and 87 in August 2012.” The EA/EAW is incomplete by not explaining whether or not this on-site observation includes touch-on-goes. The EA/EAW is inadequate because the count is 5 years old and is not an up-to-date on-site survey.

Paragraph 4, third bullet, states that there were 56 turboprop operations, which require jet fuel. According to Airnav, the only fuel available at Lake Elmo Airport is 100LL; no jet fuel is available. By comparison, the New Richmond, Wisconsin airport - and the downtown St. Paul airport - have 100LL and Jet A fuel. The EA/EAW is incomplete by failing to address this discrepancy.

St. Paul Pioneer Press, April 1, 2018 contains an article “St. Paul Airport Flight Ops in a Stall ...” in which the FAA is reported to have changed its method of counting “operations” and now exclude flyovers. The EA/EAW is incomplete without explaining this discrepancy.

**Page A-3:**

The EA/EAW, third bullet states: “**Table 1** illustrates that adjustments were made to the scale of the MACNOMS counts to match the 2012 forecast base year operations estimates.” [Emphasis added.] The EA/EAW does not adequately explain how “adjustments” are calculated. What does this actually mean? It appears to be a fudge factor.

Table 1 contains a column heading, Forecast Target.” The EA/EAW is incomplete by not adequately explaining the meaning of the column.

The last bullet states, “For example, there were no flight tracks for helicopter arrivals or touch-and-goes in the dataset, but there were flight tracks for helicopter departures. Therefore, the helicopter arrivals and touch-and goes were modeled based on helicopter departure data”. The EA/EAW is inadequate by failing to consider that two helicopters, based at Lake Elmo Airport, were sold.

**Page A-4:**

Paragraph 3 references the closed FAA enroute radar systems, terminal secondary surveillance systems, Airport Surface Detection Equipment (ASDE-X) systems & Wide Area Multilateration (WAM) site, presumably to Minneapolis-St. Paul Airport. The EA/EAW is inaccurate by failing to explain the accuracy of each system at Lake Elmo. The EA/EAW is inadequate by failing to address the issue: whether or not aircraft can fly below radar and still be counted and be legal.

The last paragraph states there were 19,757 total aircraft flight tracks captured by MACNOMS at Lake Elmo Airport in 2016 per Mead & Hunt. The EA/EAW does not inadequate describe how are these numbers derived, whether or not they are calculated or actual numbers, and whether or not the numbers include touch-and-goes. The EA/EAW is inadequate by failing to explain what happened to the 14, 000+ military operations, stated in the EA/EAW, page 4-5.

**Page A-7:**

91

Paragraph 1 states: “*Local Operations*: There were 10,880 MACNOMS flight tracks in 2016, or 58.6% of total flight tracks, which represent local operations at Lake Elmo Airport. This is consistent with the January 2017 FAA Terminal Area Forecast, which estimates that approximately 61.2% of aircraft activity at Lake Elmo Airport consists of local operations.” The EA/EAW is inadequate by failing to describe how “flight tracks” relate to operations? (They don’t match.) It is important to reference, again, St. Paul Pioneer Press, April 1, 2018 contains an article “St. Paul Airport Flight Ops in a Stall ...” in which the FAA is reported to have changed its method of counting “operations” and now exclude flyovers. The EA/EAW is incomplete without explaining this discrepancy

**Page A-9:**

92

Paragraph 1 states: “Mead & Hunt concluded that the 5,156 operations for which the origin/destination airport is unknown represent flights between Lake Elmo and airports outside the Twin Cities metro area.” The EA/EAW is inadequate by failing to provide the supporting data.

**Page A-11:**

93

Table 12 contains estimates. The EA/EAW is adequate by failing to provide the data supporting these estimates.

**Page A-12:**

94

Table 13 lists eight make/model turboprop aircraft. These aircraft require jet fuel. Therefore, the EA/EAW is inaccurate by failing to consider whether or not the aircraft are really at Lake Elmo Airport. (See also comments to page A-20 below.)

**Page A-13:**

95

Table 14 references an estimate of the Operational Fleet Mix. The EA/EAW is incomplete without containing the study and data upon which the estimate is based.

**Page A-15:**

96

Paragraph 1 states: “The estimated total of 25,596 operations at Lake Elmo Airport in 2016 is consistent with the Base Case LTCP forecast, which projected between 25,000 and 26,000 operations for 2016. The LTCP included High Range and Low Range forecasts ...” It is important to reference again: St. Paul Pioneer Press, April 1, 2018 contains an article “St. Paul Airport Flight Ops in a Stall ...” in which the FAA is reported to have changed its method of counting “operations” and now exclude flyovers. The EA/EAW is incomplete without explaining this discrepancy.

Furthermore, the latest FAA aircraft count at Lake Elmo Airport (February 26, 2018) finds there are 183 aircraft based there: 178 single engine, 4 multi engine and 1 helicopter, which is less than the total number (208) projected for the “Base Case scenario in Table ES-1 of the Lake Elmo Airport 2035 Long Term Comprehensive Plan and which is less than the number cited on page 4-5 (Table 4-1) of the EA/EAW. The EA/EAW is incomplete without reconciling these discrepancies.

**Page A-16:**

Paragraph 2.1 states in part, “The role of the Airport is not expected to change during the 20-year planning window analyzed in the 2035 LTCP.” **This statement is not accurate.** West Lakeland Township concludes that MAC is, indeed, changing the role and classification of the airport because MAC is referencing the upper end of the 10 passenger and under aircraft, which is not here today. If West Lakeland Township’s conclusion is inaccurate, then MAC must state, **in writing**, that MAC will **not** change the role and classification of the airport.

Page A-20:

Footnote 3 states: “While the LTCP used a 5-knot headwind, this analysis takes into account that users often must operate with a tailwind to take off from the more favorable runway end.” The EA/EAW fails to consider why a pilot would take-off with a tailwind when there is a choice of runways at Lake Elm.

Regarding Table 20, the Aircraft Owners and Pilots Association (AOPA) recommends JP-4 or Jet A fuel for the Beechcraft King Air 200, Pilatus PC-12, and Socata TBM 700 turbo props. The EA/EAW is inadequate by failing to confirm whether or not these aircraft are at Lake Elmo Airport today. According to the FAA document, 21D 03-06-2018 based aircraft, these aircraft are **not** at Lake Elmo Airport today.

Finally, FAA Order JO 7110.65W (December 10, 2015) states on pages 3-8-2 and 3-9-5 that there are two separate categories of aircraft: Category 1: “small single-engine propeller driven aircraft weighing 12,500 lbs. or less, and all helicopters”; and Category 2: “small twin-engine propeller driven aircraft weighing 12,500 pounds or less.” At present, Lake Elmo Airport has only Category 1 aircraft (single engine) and small Category 2 aircraft (the largest being a twin-engine Piper PA-31P, with a maximum takeoff weight of 6,500 pounds).

In short, MAC’s proposed plans will allow Category 1 and Category 2 aircraft up to 12,500 lbs., far larger than the Category 2 aircraft using Lake Elmo Airport today.

**Page A-18:**

Paragraph 2.2 states in part, “The recommended runway length is determined according to a family grouping of airplanes having similar performance characteristics and operating weights. The 2035 LTCP states that the critical aircraft at 21D remain small, propeller-driven airplanes, weighing less than 12,500 pounds and with fewer than 10 passenger seats. The fewer than 10 passenger seat category is further divided into two fleet categories, namely, “95 percent of the fleet” or “100 percent of the fleet”. AC 150/5325-4B provides runway length curves for each of these fleet categories as illustrated below in **Chart 2.**”

FAA Order JO 7110.65W (December 10, 2015) states on pages 3-8-2 and 3-9-5 that there are two separate categories of aircraft: Category 1: “small single-engine propeller driven aircraft weighing 12,500 lbs. or less, and all helicopters”; and Category 2: “small twin-engine propeller driven aircraft weighing 12,500 pounds or less.” At present, Lake Elmo Airport has only Category 1 aircraft (single engine) and small Category 2 aircraft (the largest being a twin-engine Piper PA-31P, with a maximum takeoff weight of 6,500 pounds). Using the above criteria, the EA/EAW is incomplete without answering the question: Why wouldn’t the 95% of fleet calculation be sufficient?

**Page A-21:**

Per charts in Lake Elmo Airport 2035 LTCP, which are from the aircraft manufacturer, the Accelerate/Stop distance for 100% useful load is: Cessna 414 is closer to 4,900 feet for given

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airfield conditions; Cessna 310 – 4,200 feet; and Beech Barron 58 - closer to 3500+ feet. The EA/EAW is insufficient until these discrepancies are rectified.

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The last paragraph states: “When considering the range of runway lengths for various useful load percentages, a runway length of 3,500 to 3,600 feet would accommodate most aircraft and loading conditions for aborted takeoff operations from 21D, and would accommodate all takeoff length requirements.” West Lakeland Township disputes this statement because it applies to perfect conditions, only for aircraft with the useful loads rating for under the 3,500’ distances, and that is everything goes perfect. Nothing goes perfect when someone has to abort a takeoff. The EA/EAW is incomplete without addressing this issue.

**Page A-22:**

100

Paragraph 1 states in part: “However, during periods when the runway is wet and slippery from snow cover or ice, these ‘contaminated’ surface conditions decrease the effectiveness of braking and thereby increase the length of runway needed for landing.” The EA/EAW is insufficient by failing to explain that, if an aircraft owner does not feel safe using a particular airport, then they should not use it. Safety comes first.

**Page A-23:**

101

Table 23 is entitled “**Average** Adjusted Landing Lengths.” [Emphasis added.] The EA/EAW is inadequate by failing to explain that *averaging* makes everything appear better than it actually is. The accelerate/stop distance is referenced on this page but it fails to mention the A/S distance with a contaminated runway. Per a chart supplied by Pilatus for a PC-12, with a .125” of water on the runway, requires almost 5000 feet to stop when normally there is a dry 3,000 foot runway available. The same criteria apply for landing lengths for a contaminated runway. Thus, using *average* understates the actual or real numbers for a particular aircraft.

The last paragraph states in part, “Based on the analysis of 2016 MACNOMS data presented in Section 1, approximately 97% of operations on Runway 04/22 are conducted by single-engine piston aircraft, nearly all of which weigh less than 5,000 pounds. Furthermore, the 2016 MACNOMS data indicate that approximately 25% of total aircraft operations at Lake Elmo Airport take place on Runway 04/22.” The EA/EAW is insufficient by failing to provide the data to show how MACNOMS actually tell which runway an aircraft uses.

**Page A-24:**

102

The first 6 aircraft in Table 24 require a takeoff runway length greater than the 2,500 feet, currently there today. The first 5 aircraft require a takeoff runway length greater than the 2,750 feet that is proposed. The EA/EAW is insufficient by failing to explain why these aircraft are included in the Table.

**Page A-25:**

103

The EA/EAW is incomplete by failing to state: If the runways at Lake Elmo are too short for aircraft, there are airports nearby: South St. Paul and St. Paul that are 10 nautical miles away; and New Richmond, Wisconsin is 16 nautical miles away.

**Appendix B – 30<sup>th</sup> Street North Realignment Alternatives Review**

**Page 34 (pdf number):**



104 The last sentence states in part, "... which categorizes this soil type as **fair to poor** for use as a roadway subgrade material". [Emphasis added.] The EA/EAW is insufficient by failing to adequately describe the environmental, along with the cost and maintenance consequences of building a road in this soil type.

**Page 41 (pdf number):**

105 Paragraph 2 states in part: "Based on fleet capacity and planned extension of water services to new residential areas immediately west of the airport, the project team does not believe that the changes in travel times shown in Table 2 represent an adverse effect to water shuttles that cannot be mitigated by available means". The EA/EAW is inadequate by failing to consider that fire trucks don't travel as fast and are not as agile as cars, especially during inclement weather.

Paragraph 5 ("Alternative Review") states in part: "Neal Avenue to the immediate south of 30th Street N is functionally classified as a local road, which 'connect blocks within residential neighborhoods as well as commercial and industrial areas.'" This statement is inaccurate; there are no commercial or industrial areas on Neal Ave. It is zoned Single Family Estates (SFE).

**Page 42 (pdf number):**

106 Paragraph C states in part: "Posted speed limits are relatively high in the project area. The following posted speed limits were observed within the project area ...". All road speed limits in Minnesota are set by MnDOT, as was 30<sup>th</sup> Street and Neal Avenue.

**Page 48 (pdf number):**

Paragraph 1 states in part: "Design characteristics and travel time increases associated with Alternatives 4A and 4B are preferable to those associated with Alternative 3. However, these new alternatives would be more costly to implement." The EA/EAW is incomplete by failing state that the Bayport Fire Department nixed Alternatives 4A and 4B because of the physics of fire trucks in roundabouts, the intersection of 4B, and building an additional cul-de-sac for two homes on Neal Ave.

The EA/EAW is insufficient if it does not consider the implications of an e-mail chain between the West Lakeland Township attorney and the MAC attorney:

107 "If one of the townships fails to relinquish the 30<sup>th</sup> Street road right of way (ROW) to MAC, in order to construct the 3,500' runway, MAC would take the ROW by eminent domain. Once that is done apparently they can't use federal funds to reconstruct the realigned section of 30<sup>th</sup> Street and MAC would be required to compensate the townships for the loss of the road and 30<sup>th</sup> Street would essentially be vacated. MAC doesn't have the authority to vacate roads.

"Further, if the townships agree to give MAC the ROW, why would WLT agree to take a road that does not meet MnDOT design standards according to the township engineer? West Lakeland Township would contend that MAC can't force a road upon them that they don't want and doesn't meet MnDOT design standards. Baytown has stated that they would be willing to move the township boundary in order to maintain the cost share for the maintenance of 30<sup>th</sup> Street. Once brought to the attention of Baytown why would they want a road that does not meet MnDOT design standards? "In additional if the township boundary was changed to match the

realigned section of 30<sup>th</sup> Street, West Lakeland Township would contend this is forced annexation upon them by MAC which they don't have that authority."

When the subject of the realigned section of 30<sup>th</sup> Street not meeting MnDOT Design Standards was brought forth to MAC in an earlier conversation, MAC stated they had a waiver from MnDOT for such a design. But that doesn't address the issue that in Baytown's ordinances and in West Lakeland's ordinances (8.10.1) it states: "Proposed streets shall conform to the state, county or local road plans or preliminary plans as have been prepared, adopted and/or filed as prescribed by law" [Emphasis added.]. The EA/EAW is incomplete until this issue is addressed.

**Appendix C – Wetland Delineation, Functional Assessment, and Associated Correspondence**  
**Sub-Appendix H - MNRAM Functional Assessment Forms**

**Page 265 (pdf number):**

In the Wetland Functional Assessment Summary chart, Wetland #1's Sensitivity to Storm water & Urban Development is rated "**Exceptional.**" The EA/EAW inadequately addresses the potential for a significant environmental impact on this wetland.

**Appendix D – Section 106 Documentation and Correspondence**

**Page 297 (pdf number):**

The last paragraph states in part: "Aircraft size and type will **not** change from what is currently landed on the runways adjacent to the railroad corridor." [Emphasis added.] This statement is inaccurate and misleading because the aircraft in the upper end of the 10-passenger category, and slightly under the next category, are not at Lake Elmo Airport today, but could use Lake Elmo Airport after the planned runway expansion.

Furthermore, FAA Order JO 7110.65W (December 10, 2015) states on pages 3-8-2 and 3-9-5 that there are two separate categories of aircraft: Category 1: "small single-engine propeller driven aircraft weighing 12,500 lbs. or less, and all helicopters"; and Category 2: "small twin-engine propeller driven aircraft weighing 12,500 pounds or less." At present, Lake Elmo Airport has only Category 1 aircraft (single engine) and small Category 2 aircraft (the largest being a twin-engine Piper PA-31P, with a maximum takeoff weight of 6,500 pounds).

In short, MAC's proposed plans will allow Category 1 and Category 2 aircraft up to 12,500 lbs., far larger than the Category 2 aircraft using Lake Elmo Airport today.

**Appendix E – U.S. Fish & Wildlife Section 7 Consultation and Correspondence**

**Page 436 (pdf number):**

The second line in the correspondence from Mr. Horton states in part, "... project **may** affect, but is not likely to adversely affect the northern long-eared bat." [Emphasis added.] The EA/EAW is inadequate because it fails to analyze the impact of removing 20-acres of trees, **habitat** for the long-eared bat.

**Pages 439-440 (pdf number):**

The last paragraph of page 339 states in part: "The bees gather pollen and nectar from a variety of flowering plants and prefer tallgrass prairie habitat." The EA/EAW fails to

111 | acknowledge that there is such habitat near the wetlands. A rusty-patched bumble bee (RPBB) survey must be undertaken after the queen bee's eggs have hatched and the workers are foraging. It is unclear when, in the month of June, the field survey described on page 440 was undertaken. The survey may have been too early in June, or too early in the day – and too perfunctory - to adequately search for RPBB. Unless a full study has been done where worker bees are actually out gathering nectar, the EA/EAW is inadequate and incomplete.

**Page 440 (pdf number):**

112 | The first paragraph, last sentence states: “No bald or golden eagles were observed during the field work.” In fact, bald eagles and turkey vultures have been observed numerous times, along with trumpeter swans and sandhill cranes. Obviously, EA/EAW is incomplete; observing multiple days in June is not enough time to adequately catalog the wildlife there.

**Appendix G – USDA NRCS Farmland Conversion Impact Rating Form AD-1006**

**Page 464 (pdf number):**

113 | The EA/EAW language causes the same concern as stated in the farmland information in the EA/EAW, page 5-9 above. West Lakeland Township asserts that the Farmland Conversion Impact Rating is low and so does the Department of Agriculture when contacted. The number of row crop acres to be removed is more than stated, plus there are acres to be converted from row crops to rusty patched bumblebee habitat flowers.

The Green area cannot be the only area counted for removal of crop land. Farmers do not like to plant row crops in irregular shapes or around tight curves. Furthermore, based on Figure 4-8, West Lakeland Township calculates that areas that are currently mowed for hay production, that will be removed, is estimated to be approximately 50 plus acres. In sum, the EA/EAW is inaccurate and incomplete.

**Appendix H – Environmental Site Assessment Report**

**Page 481 (pdf number):**

114 | The fourth line from the top references the FEMA floodplain map. The Valley Branch Watershed District has its own 100-year flood level map, which is different from FEMA's. The EA/EAW is incomplete; these differences must be reconciled.

The first full paragraph references Canada thistle being there. Canada thistle is an evasive species and should be removed. The EA/EAW is inadequate by failing to discuss the environmental impacts of the various removal options.

**Page 483 (pdf number):**

115 | Paragraph 5 states in part: “No evidence of underground storage tanks (USTs) ... were noted.” The EA/EAW is inaccurate. There is a Holiday gas station, located 1,000 feet from the northwest corner of MAC property. This is not covered in the text, but is listed in table 2 (pdf page 487). The EA/EAW fails to resolve this inconsistency.

**Page 490 (pdf number):**

116 | Site 10 is listed as an active permit is for monitoring effluent from airport maintenance activities (e.g., runoff of de-icing materials).” The EA/EAW is incomplete by failing to address

116 | the extent to which de-icing materials are being used a Lake Elmo, and the environmental impacts of increased demand.

**Page 555 (pdf number):**

117 | This page references “glycol-based de/anti-icing chemicals” again and that the Minnesota Pollution Control Agency (MPCA) has approved a permit for its use. The EA/EAW is incomplete by failing to address the extent to which de-icing materials are being used a Lake Elmo, and the environmental impacts of increased demand. If these chemicals are **not** being used at Lake Elmo Airport, the EA/EAW is insufficient when it fails to explain why they mentioned in the EA/EAW.

**Page 580 (pdf number):**

118 | This page contains a third reference to glycol-based de/anti-icing chemicals”, with a different date than the page 555 reference above. The EA/EAW is inadequate by failing to state how long these – or other de/anti-icing chemicals have been used at Lake Elmo Airport.

**Appendix J – Aircraft Noise Analysis Report**

**Page 698 (pdf number):**

119 | This page references a memo requesting non-standard Aviation Environmental Design Tool (AEDT) aircraft substitutions. The EA/EAW is incomplete by failing to explain why these substitutions being made. According to the FAA Lake Elmo Airport base list (dated 2/26/18), the Piper PA-44, P-68 Observer, Rockwell Commander 112, Van’s aircraft types and the Diamond Twin Star are **not** based at Lake Elmo Airport. The EA/EAW is incomplete by failing to explain how MAC knows these planes even use Lake Elmo Airport.

**Page 703 (pdf number):**

120 | The last paragraph states in part: “Approximately 30% of turboprop arrivals and no jet arrivals occur on Runway 14 in the 2016 baseline and 2025 no-action scenarios, whereas approximately 45% of turboprop arrivals and 33% of jet arrivals occur on Runway 14 in the 2025 ‘with project’ scenarios. In all scenarios, all multi-engine turboprop and jet aircraft operations are expected to occur on the primary runway.” With no jet fuel at Lake Elmo, the EA/EAW is inadequate by failing to explain MAC knows that turboprop aircraft use Lake Elmo Airport. The EA/EAW is incomplete by failing to explain whether or the aircraft counting method is the same as described in the April 1<sup>st</sup> St. Paul Pioneer Press.

**Appendix L – Public Involvement**

**Page 1028 (pdf last page):**

121 | The chart explains the next steps in the environmental review process. However, nowhere is it mentioned an Environmental Impact Statement (EIS) is even a possibility.

Furthermore, the public hearing, conducted on April 4, 2018, provided no information – oral or written – that an Environmental Impact Statement is a possibility. In fact, a MAC representative (employed Mead & Hunt) stated there were not significant environmental effects, insinuating that a “no need” determination is a *fait accompli*.

This is unacceptable.

**V. THE PROPOSED DEVELOPMENT SATISFIES THE GENERAL STANDARD AND ALL OF THE SPECIFIC FACTORS THAT MUST BE CONSIDERED TO ORDER AN EIS.**

Minn. Rule 4410.1700, Subp. 1 provides the general standard which the Responsible Government Unit (“RGU”) must apply to its decision on the need for an Environmental Impact Statement (EIS):

“An EIS **shall** be ordered for projects that have the potential for significant environmental effects.” [Emphasis added.]

See also: Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995): “An EIS must be prepared for projects that have a ‘potential for significant environmental effects.’” [See also Pope County Mothers v. MPCA 594 N.W.2d 233, 236 (Minn. App. 1999).]

In other words, the RGU has **no choice** other than to order an EIS if the standards are satisfied.

Minnesota Rule 4410.1700, Subp. 7, contains the four specific factors that must be considered in determining “whether a project has the potential for significant environmental effects.” [See: Iron Rangers For Responsible Ridge Action v. Iron Range Resources, Inc. 531 N.W.2d 874, 880 (Minn. App. 1995), review denied: “The EQB has identified four factors the RGU must evaluate in determining whether a project has potential for significant environmental effects.” See also: Pope County Mothers v. MPCA 594 N.W.2d 233, 236 (Minn. App. 1999) and MCEA v. MPCA 644 N.W. 2d 457, 462-463 (Minn. 2002).]

[Note: The assessment of litigation risks is NOT one of the factors. See Prior Lake American v. Mader 642 N.W.2d 729, 739 (Minn. 2002).]

As explained below, **all four of the factors, necessary to order an EIS for the proposed Lake Elmo Airport runway expansion, are satisfied.**

**“A. type, extent, and irreversibility of environmental effects.”**

As stated in the letter from Mr. Stuart Grubb, PG (Exhibit 1) and throughout this document, the type, extent, and irreversibility of environmental impacts are great. In brief, once habitat is changed it is very difficult and expensive to restore; once groundwater is polluted, it is expensive to clean up.

**“B. cumulative potential effects of related or anticipated future projects.”**

As stated in the letter from Mr. Stuart Grubb, PG (Exhibit 1), and throughout this document, the proposed runway projects and Metropolitan Council advocacy for connected sewer and water are “connected actions.” They have the potential for significant environmental effects and should be part of the EIS.

**“C. the extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority.”**

Minn. Rule 4410.0200, Subp. 51, defines “mitigation” as:

- “A. avoiding impacts altogether by not undertaking a certain project
- B. minimizing impacts by limiting the degree of magnitude of a project;
- C. rectifying impacts by repairing, rehabilitating, or restoring the affected environment;
- D. reducing or eliminating impacts over time by preservation and maintenance operations during the life of the project;
- E. compensating for impacts by replacing or providing substitute resources or environments; or
- F. reducing or avoiding impacts by implementation of pollution prevention measures.”

“‘Mitigation’ includes avoiding or limiting the size of a project, repairing or restoring the environment, working to preserve or maintain the environment during the life of the project, or replacing or substituting resources. Minn. Rule 4410.0200, subp. 51.” [Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995).]

The EA/EAW has not demonstrated that provisions of the Valley Branch Watershed District or other permit processes can sufficiently mitigate the potentially irreversible impacts of the development on water resources, for example. In fact, regulatory authority is inadequate. [See letter from Mr. Stuart Grubb, PG, attached as **Exhibit 1**.]

In summary, the EA/EAW’s statements regarding mitigation of the adverse impacts to the significant water and other natural resources are **“merely vague statements of good intentions” and, therefore, are not adequate mitigation efforts.** See National Audubon Society v. MPCA 569 N.W. 2d 211, 217, quoting Iron Rangers, 531 N.W.2d at 881, which quotes from Audubon Society v. Dailey 977 F2d 428, 436 (8<sup>th</sup> Cir. 1992).

Most importantly, adequate mitigation (through any permit process) can only be accomplished after ALL OF THE FACTS are been gathered. An EIS is the best way to gather the facts.

**“D. the extent to which the environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.”**

No other environmental studies on the environmental impacts of the proposed project presently exist or are currently planned by a public agency or the developer.

**VI. INSUFFICIENT INFORMATION DOES NOT ALLEVIATE THE NEED FOR AN EIS.**

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As described in this memo and the attached exhibits, the EAW does not accurately and completely address certain environmental impacts. However, as stated above, the RGU has only two choices if there is insufficient information: (1) make a positive declaration for an EIS and include the lacking information as part of the EIS scope; or (2) postpone the decision on the need for an EIS up to 30 days to obtain the lacking information. [See Minnesota Rule 4410.1700, Subpart 2a.]

In fact, MAC has only 30+ days to gather additional information before it is required to make an EIS determination. This is not enough time to gather appropriate information. [See requirements of Stuart Grubb, PG, attached as **Exhibit 1**.]

In addition, the EA/EAW is incomplete without stating the best date and methodology to adequately survey for the rusty patched bumble bees (RPBB), the first bee in the continental United States to be listed as “endangered” under the federal Endangered Species Act. Certainly, an adequate survey for RPBB cannot occur within the next 30 days - should be no earlier than mid-summer for areas directly or indirectly impacted by this project. Thus, an EIS is the only option.

Nevertheless, this letter, the attached exhibits, and the record in general provide sufficient legal and factual basis to require an EIS without gathering any more information beforehand.

## **VII. OTHER BENEFITS OF AN EIS.**

A. ECONOMIC IMPACTS CAN ALSO BE STUDIED. The wisdom of ordering an EIS is not just to clearly determine the nature and extent of the environmental impacts of the proposed project. Minnesota Statute 116D.04, Subd. 2a, states in part,

“The environmental impact statement ... discusses appropriate alternatives to the proposed action and their impacts, and explores methods by which adverse environmental impacts of an action could be mitigated. The environmental impact statement shall also analyze those **economic, employment** and sociological effects that cannot be avoided should the action be implemented.” (Emphasis added.)

Minn. Rule 4410.2300 elaborates on the EIS requirements. Paragraph G requires an analysis of alternatives to the proposed project, including no action. Paragraph H requires a “thorough, but succinct discussion” of sociological and economic impacts.

The economic and environmental impacts of the proposed runway expansion on the citizens of West Lakeland Township are of great concern to the West Lakeland Township Board of Supervisors. Attached **Exhibit 3** states the total estimated market value of the 348 parcels, within 1 mile of the airport, is \$93,997,000 million. Attached **Exhibit 3A** states the total estimated market value of the 2,103 parcels, within 2 miles of the airport, is \$823,642,900. These economic impacts on these properties cannot be overlooked – and must be part of an EIS.

B. IT IS MORE DIFFICULT TO OBTAIN INFORMATION DURING THE PERMIT PROCESS. The regulations governing permits needed from other government units may not have the same ability to obtain the necessary information than an EIS.

131 C. WEST LAKELAND TOWNSHIP’S “PREFERRED ALTERNATIVE” WOULD BE STUDIED. Missing from the EA/EAW is West Lakeland Township’s preferred alternative, which is: (1) repair and repaving both runways and taxiways in their existing footprint, thus allowing existing aircraft to continue to safely use Lake Elmo Airport; (2) mitigate incompatible land uses by proper zoning, promulgated though the JAZB, and by purchasing property to remove hazards; and (3) upgrade the instrument approach procedures. Minnesota Rule 4410.2300.G. requires discussion of “reasonable alternatives.” This is a reasonable alternative.

### VIII. THE RIGHT TO PROCEDURAL DUE PROCESS.

132 The Minnesota Supreme Court stated, in Minnesota Public Interest Research Group v. Minnesota Environmental Quality Council 237 N.W. 2d 379, 381 (Minn. 1975), “Where, as here, there is understandable evidence of public demand for an environmental review in this important and sensitive field, we conclude that a hearing is required to fulfill the purposes of chapter 116D.” Although this case involved a statute, since repealed, that allowed for a citizens petition for an EIS, the principles are the same. The public hearing that was conducted on April 4, 2018 **failed its primary purpose**. Answers were not provided by MAC and the citizens were lead to believe that the environmental impacts were negligible: There was no discussion that the purpose of the process and that the comments should be directed towards the inadequacy of the EAEAW, whether or not there is a “potential for significant environmental effects”, and whether or not an EIS should be ordered.

133 It is known that the MAC will be asking for additional information after the public comment period closes. This presents an unfair advantage unless “procedural due process” is ensured.

134 To ensure “procedural due process,” my client, West Lakeland Township, requests a copy of all documents and correspondence (including electronic) generated by or received by the MAC after the close of the public period. In addition, West Lakeland Township requests an adequate opportunity to rebut any new information provided and to provide comments to the MAC before the EIS decision is made.

### IX. EXTENT OF THE RECORD TO BE REVIEWED BY THE RGU.

135 The RGU’s decision on the need for an EIS must be based on the environmental assessment worksheet, the comments received during the comment period, and relevant documents available to and in the possession of the RGU. All of these are part of the public record to be reviewed by the RGU prior to its decision. See Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 907-908 (Minn. App. 1995); and National Audubon Society v. MPCA 569 N.W. 2d 211, 216 (Minn. App. 1997).

### X. BIAS.

136 The chart on the last page of the EA/EAW, Appendix J, explains the next steps in the environmental review process. However, nowhere is it mentioned an Environmental Impact Statement (EIS) is even a possibility.

136 Furthermore, the public hearing, conducted on April 4, 2018, provided no information – oral or written – that an Environmental Impact Statement is even a possibility. In fact, a MAC representative (employed Mead & Hunt) stated there were **no** significant environmental effects, insinuating that a “no need” determination is *fait accompli*.

This is unacceptable. West Lakeland Township demands that another public hearing be conducted – and that MAC hire another contractor to provide an objective analysis of the potential for significant environmental effects, based on its own investigation and based on comments received during the process.

#### **XI. CONFLICT OF INTEREST.**

137 Although the West Lakeland Township Board of Supervisors works hard to build public confidence in township governance, public trust in government, in general, is probably at an all-time low. Citizens’ comments made during the April 4, 2018 public hearing support this view. Nevertheless, the project proposer, MAC, decided to adopt the role of “responsible government unit” (RGU) to prepare the EA/EAW, even though the rules of the Minnesota Environmental Quality Board allow another entity. It is an obvious conflict of interest that the project proposer is the **same entity** as the entity that decides whether or not to order an Environmental Impact Statement (EIS).

Specifically, Minnesota Rule 4410.4300, Subpart 21 states:

“Airport projects. ... A. For construction of a paved, new airport runway, the DOT, local governmental unit, or the Metropolitan Airports Commission shall be the RGU ...”

138 Furthermore, Mike Madigan, MAC Commissioner representing the Lake Elmo area, and former MAC Executive Director and CEO, Jeff Hamiel, are pilots who use Lake Elmo Airport.

139 To avoid the appearance of impropriety, MAC should agree that the Minnesota Department of Transportation is the “RGU”, who would then decide whether or not to order an EIS.

#### **XII. EMMONS AND OLIVIER MEMO**

140 The West Lakeland Township Board of Supervisors incorporates by reference, as part of its comments to the draft EA/EAW, the letter from Mr. Stuart Grubb, PG, Emmons and Olivier Resources, attached as **Exhibit 1**. Mr. Grubb specifically states, due to the significant environmental impacts, an Environmental Impact Statement should be ordered.

#### **XIII. FOCUS ENGINEERING MEMO**

141 West Lakeland Township Board of Supervisors also incorporates by reference, as part of its comments to the draft EA/EAW, the letter from Mr. Ryan Stempski, P.E., of Focus Engineering, attached as **Exhibit 4**. Mr. Stempski specifically challenges 30<sup>th</sup> Street North re-alignment assumptions and raises other significant environmental issues, all of which can be most properly addressed in an Environmental Impact Statement (EIS).

#### XIV. CONNECTED ACTION – SEWAGE AND WATER

142 | A letter dated November 16, 1998, from the Metropolitan Council to the Metropolitan Airports Commission states in part, “The MAC has budgeted money at all reliever airport facilities for sanitary sewer and watermain installation. They money has been budget for several years now **with no apparent actions**. Council staff are concerned that this action is never going to occur. Council staff are highly supportive of the need to hookup the reliever airports ... to the metropolitan disposal system.” (See attached **Exhibit 5**.)

The EA/EAW is incomplete without a discussion of whether or not a sanitary sewer and watermain installation is being planned. If planned, then it is a connected action that should be included in the current environmental review process.

#### XV. WEST LAKELAND TOWNSHIP’S PREFERRED ALTERNATIVE – OMITTED.

143 | As stated in section VII above, West Lakeland Township’s preferred alternative is missing, which is: (1) repair and repave both runways and taxiways in their existing footprint, thus allowing existing aircraft to continue to safely use Lake Elmo Airport; (2) mitigate incompatible land uses by proper zoning, promulgated though the JAZB, and by purchasing property to remove hazards; and (3) upgrade the instrument approach procedures. Minnesota Rule 4410.2300.G. requires discussion of “reasonable alternatives” in an EIS. .

The EA/EAW, page 3-1, references FAA Order 5050 4B, which pertains to National Environmental Policy Act (NEPA). MAC’s interpretation of this order results in the failure to adequate examine West Lakeland Township’s preferred alternative, a reasonable alternative to the proposed project.

Thus, an Environmental Impact Statement should be ordered to allow the examination of West Lakeland Township’s preferred alternative pursuant to the Minnesota Environmental Policy Act or “MEPA” (Minnesota Statute 116B and Minnesota Rules, Chapter 4410).

#### CONCLUSION

144 | In summary, the draft EA/EAW is an unpersuasive and biased attempt to provide safety and economic justification to unnecessarily expand the Lake Elmo Airport. Contrary to law and responsible public policy, the draft EA/EAW fails to locate and analyze environmentally superior sites. It leaves many questions unanswered that must be included in the final EIS.

145 | As stated in Section II.B. above, “The very purpose of an EIS ... is to determine the potential for significant environmental effects **before they occur**. **By deferring this issue to later permitting and monitoring decisions, the [RGU] abandoned [its] duty** to require an EIS where there exists a potential for significant environmental effects.” (Emphasis added.) See Trout Unlimited v. Minnesota Dept. of Agriculture 528 N.W.2d 903, 909 (Minn. App. 1995). See also Pope County Mothers v. MPCA 594 N.W.2d 233, 237-238 (Minn. App. 1999).

In other words, legally, the MAC - and other permit authorities - must “GET THE FACTS” before MAC can decide what to do. The information contained in the EAW is

inadequate to support a conclusion that there will be no "... potential for significant environmental effects." An EIS is the best way to "GET THE FACTS."

Therefore, the West Lakeland Township Board of Supervisors respectfully requests that the an EIS be ordered, which will contain a thorough analysis of the issues raised in this letter, and by other commenters, including but not limited to: (1) alternative sites that are environmentally superior sites; (2) cost comparison of alternatives, confirmed by an independent consultant; (3) the economic impacts of the Lake Elmo Airport, when guided and rezoned by the Joint Airport Zoning Board; (4) source reduction and beneficial use options to reduce or alleviate the demand for a runway anti/de-icers and salt; (6) surface and groundwater impacts and remediation options; and (7) a thorough on-site survey for the existence of the federally endangered rusty-patched bumble bee.

To paraphrase Aldo Leopold, an environmental dispute arises "... from which the sharpest pen gains much glory, but the [resource] gains nothing but a chance to disappear. " (Curt Meine, Aldo Leopold: His Life and Work. Madison: University of Wisconsin Press, 1988. Page 289.) Let not the sharpest pen supplant the necessity for making sound decisions, based on the best information available. A thoroughly researched EIS will help all parties make the best decision possible.

On behalf of the West Lakeland Township Board of Supervisors, I thank you in advance for your decision to order an Environmental Impact Statement (EIS).

Sincerely yours,

*Thomas E. Casey*

Thomas E. Casey

TEC/rf

cc: West Lakeland Township Board of Supervisors – Steve Ebner; Dan Kylo, Chair; and Dave Schultz  
file

Enclosures:

- Exhibit 1 - Letter from Mr. Stuart Grubb, PG, Emmons and Olivier Resources
- Exhibit 2 – Geese photos
- Exhibit 2A – Sandhill Cranes photo
- Exhibit 2B – Trumpeter Swans photo
- Exhibit 3 – Lake Elmo Airport: Property Values – 1-mile radius

***Metropolitan Airports Commission***  
***April 17, 2018***

Exhibit 3A – Lake Elmo Airport: Property Values – 2-mile radius

Exhibit 4 – Focus Engineering (3-14-18)

Exhibit 5 – Metropolitan Council to Metropolitan Airports Commission (11-16-98)



# THOMAS E. CASEY

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April 18, 2018

Lake Elmo Airport EA/EAW Comments  
c/o MAC Environment Department  
6040 28th Avenue  
South Minneapolis, MN 55450

VIA E-MAIL ONLY  
ContactLakeElmoAirportEA@mspmac.org

RE: **Supplemental Comments to Draft Federal Environmental Assessment (EA)/ State of Minnesota Environmental Assessment Worksheet (EAW)**  
Lake Elmo Airport Runway 14/32 Relocation/Extension and Associated Improvements  
Washington Co., MN

Dear Metropolitan Airports Commission,

On behalf of West Lakeland Township, I submit this letter as a supplement to my client's comments to the Lake Elmo Airport EA/EAW, receipt of which was acknowledged by the Metropolitan Airports Commission (MAC) on April 17, 2018.

The EA/EAW, page 3-9 (figure 3-3), is a map containing the preferred alternative runway design. The green area in figure 3-3 is the new pavement to be added to the airfield, which consists of: (1) the new 3,500' (14/32) runway, to be relocated 615' east of the current 14/32 main runway; (2) a new full length taxiway, to be located north and east of that new 3,500' (14/32) runway; and (3) a taxiway, to be located south and east of crosswind runway (04/22), connecting the new full length taxiway for runway 14/32 and the old runway 14/32 taxiway.

Unfortunately, the following changes to the present runway and taxiway design increases the risk of collision. (These are euphemistically referred to as incursion areas or "hot spots.") The new incursion areas or "hot spots" are:

1. The new 3,500' (14/32) runway will cross runway 04/22 approximately 600 feet east of the existing 14/32 runway, splitting the 14/32 runway into thirds. The existing 14/32 runway was more safely placed near the end of the crosswind runway (04/22).
2. The new pavement connecting the new full length runway 14/32 taxiway and the old runway 14/32 taxiway together.

147

3. The full length taxiway for the crosswind (04/22) runway crosses the new 14/32 runway approximately 700 feet from the northwest end of runway 14/32.
4. The new full length taxiway for runway 14/32 crosses the middle of the crosswind runway (04/22).

The Metropolitan Airport Commission states in the Crystal Airport 2035 Long Term Comprehensive Plan (adopted October, 2017):

1. “A key objective for airfield improvements at Crystal Airport is to **simplify the airfield geometry** by **reducing** the number of designated “**hot spots**” on the airfield, which represent the areas with the **greatest potential** for pilot confusion and **incursion errors**. This is consistent with a nationwide initiative by the Federal Aviation Administration (FAA) to reduce the number of runway incursions and increase airfield safety. [Emphasis added.] (Page ii.)
2. “Airfield Geometry. Improving runway safety continues to be one of the FAA’s highest priorities, and the agency is working with airport sponsors to further reduce runway risks through risk-based decision making. **Risk factors** that contribute to runway incursions<sup>13</sup> may include unclear taxiway markings, airport signage, and more complex issues such as the **runway or taxiway layout**.” [Emphasis added.]<sup>13</sup> Runway incursions occur when an aircraft, vehicle, or person enters the protected area of an airport designated for aircraft landings and take offs.” [Emphasis added.] (Page 2-11.)

In summary, the preferred alternative runway and taxiway design contains more intersections – and more dangerous intersections - of runways and taxiways, known as “incursion areas.” This design is not safe and needs to be addressed.

The EA/EAW is incomplete unless it provides adequate documentation that these additional incursion areas completely satisfy all safety regulations and policies. West Lakeland Township respectfully requests, pursuant to the Minnesota Government Data Practices Act, that MAC provide a copy of the legal authority, if any, supporting MAC’s conclusion.

As stated in my client’s April 17, 2018 correspondence, the lacking information - and the significance of the potential environmental impacts – require that an Environmental Impact Statement be ordered.

On behalf of the West Lakeland Township Board of Supervisors, I thank you in advance for your kind cooperation.

Sincerely yours,

*Thomas E. Casey*

Thomas E. Casey

*Metropolitan Airports Commission*  
*April 18, 2018*

TEC/rf

cc: West Lakeland Township Board of Supervisors – Steve Ebner; Dan Kylo, Chair; and Dave  
Schultz  
File



April 10, 2018

Lake Elmo Airport EA/EAW Comments  
c/o MAC Environment Department  
6040 28th Avenue South  
Minneapolis, MN 55450

**Subject: Comments on the Lake Elmo Airport EAW**

To whom it may concern:

EOR has reviewed the Draft Federal Environmental Assessment (EA)/ State of Minnesota Environmental Assessment Worksheet (EAW) for Runway 14/32 Relocation/Extension & Associated Improvements at Lake Elmo Airport in Baytown & West Lakeland Townships, Minnesota dated February 2018. The report contains oversights and factual errors cited below. The project as proposed has the potential to cause significant environmental impacts. We request that an Environmental Impact Statement be prepared for the project.

1. Floodplain Impacts

148

Section 4.5.7 of the draft EAW includes mention of the floodplain and FEMA Special Flood Hazard Area (SFHA) mapping in Figure 4-9. The preferred alternative area of ground disturbance south of 30th Street North is within a SFHA Zone A which demarks the area subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies. Because detailed hydraulic analyses have not been performed, no Base Flood Elevation (BFE) or flood depth is regulated. Mandatory flood insurance purchase requirements and floodplain management standards apply in these areas. Per FEMA regulations, to ensure that proposed development projects meet the requirements of the NFIP and the community's floodplain management ordinance, a permit is required before construction or development begins within any SFHA. In areas designated as Zone A without BFEs provided by FEMA, such as this project area, communities must apply the provisions of Paragraph 60.3(b) of the Title 44 of the Code of Federal Regulations (CFR).

149

Report Section 5.14.3 proceeds to acknowledge Executive Order 11988 which requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.

150

Local review will be necessary by the Valley Branch Watershed District (VBWD) requiring demonstration that the fill volume will be limited so that the cumulative effect of all possible filling will not raise the 100-year flood level more than 0.1 foot. The floodplain adjacent to existing waters is to be preserved by dedication and/or perpetual easement to the VBWD.

151

Section 5.14.3 of the draft report associates floodplain filling with the wetland fill footprint of 0.06 acre, deeming that “the estimated net loss of floodplain storage is insignificant when considering the flood volumes associated with a 100-year event, and there would be no notable

151

adverse impacts on natural and beneficial floodplain values, as defined by DOT Order 5650.2, Floodplain Management and Protection, associated with preferred alternative.” Per DOT Order 5650.2, draft environmental review documents shall include sufficient discussion to permit an initial review of the adequacy of methods proposed to minimize harm, and, where practicable, to restore and preserve the natural and beneficial floodplain values affected.

152

As shown in Figure 1, superimposing the Digital Flood Insurance Rate Mapped Zone A over Figure 5-4: Preferred Alternative Wetland Impacts shows the footprint of floodplain impact to be much greater than only the wetland fill footprint. The meander of 30<sup>th</sup> Street North appears to involve approximately 590 linear feet of floodplain filling. At the existing street width of 26 feet, this alternative will involve a minimum of 0.35 acres of floodplain impact. If the road is upgraded with wider shoulders, the impact would be even greater. Current road design standards call for a minimum of width of 28 feet for a rural design (See Table 1). Therefore, the full impact of this proposed floodplain filling has not been reviewed for the preferred alternative. This oversight will cause significant environmental effects.

**Table 1. Road Design Standards**

RURAL DESIGN			
Type of Street	Minimum Right-of Way Width	Minimum Roadway Width	Shoulder Width
Minor Arterial	120 feet (36.6m)	24 feet (12.2m)	8 feet
Collector or Commercial - Industrial Street	100 feet (30.5m)	24 feet (12.2m)	4 feet
Local	60 feet (18.3m)	24 feet (12.2m)	4 feet

(West Lakeland Township Performance Standards, Section 8.10.14.1)

## 2. Stormwater Management

153

According to the Valley Branch Watershed District (VBWD) Rule 2, all stormwater discharges must be in general conformance with the VBWD Plan and local watershed management plans. Specifically, stormwater and snowmelt runoff rates will be managed so that future peak rates of runoff crossing community boundaries and/or leaving a development are below or equal to existing rates and, stormwater volume will be controlled so that surface water and groundwater quantity and quality are protected.

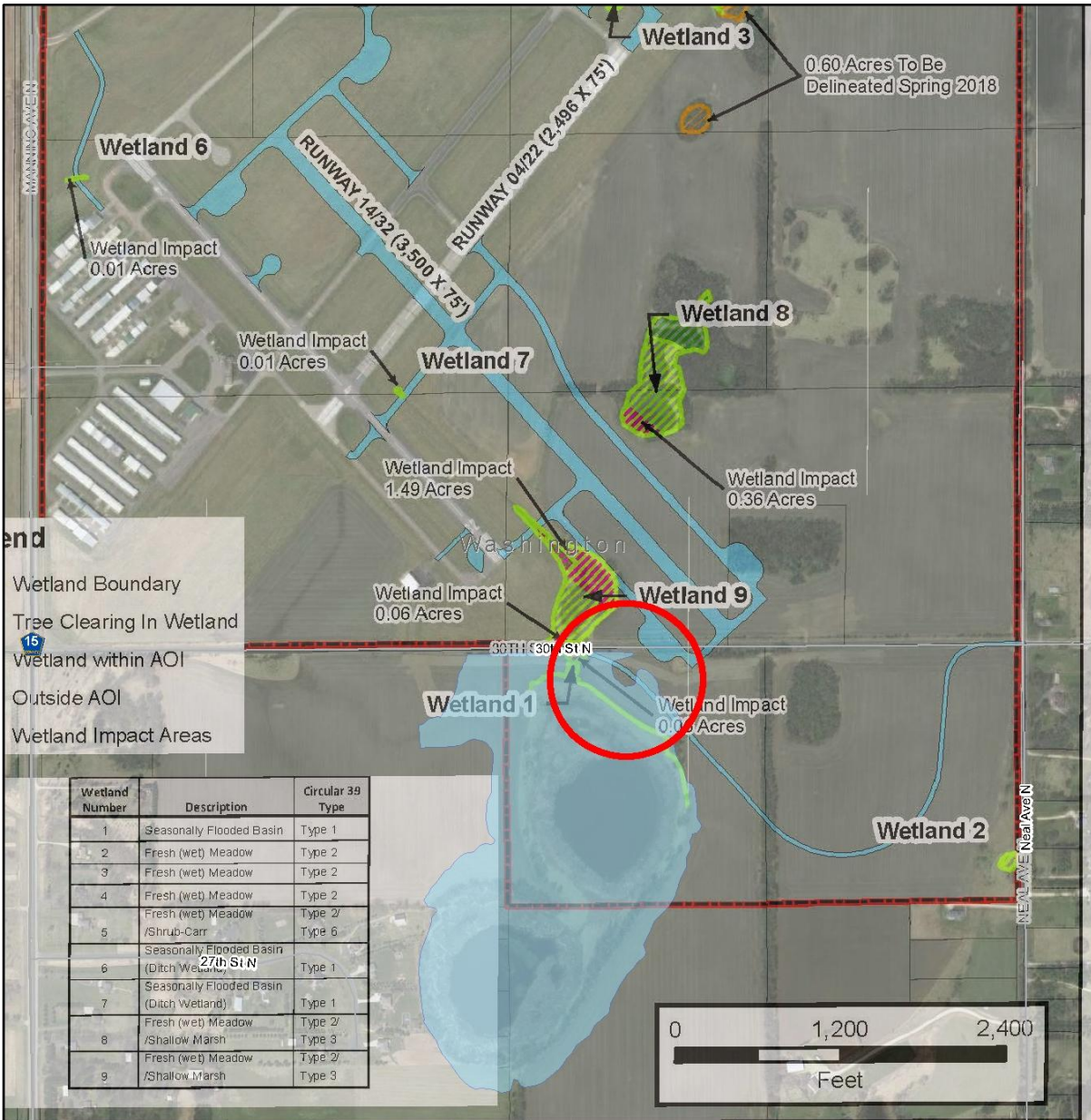
154

As articulated in section 5.14.2 of the Draft EAW report, the preferred alternative will add 850,000 square feet of impervious surface, remove 300,000 square feet of impervious, and result in a net increase of 550,000 square feet of impervious surface. This amount exceeds the VBWD applicability threshold of 6,000. Per VBWD Rule 2.6.A, the post-construction runoff volume shall be retained on site for 1.1 inches of runoff from new and fully reconstructed impervious surfaces. The project team acknowledges this on page 1000 of the EAW appendices where it states “[T]he team is considering that very closely in the design of this project. If the project can’t meet that standard, the project won’t be permitted. So, the MAC must meet that standard – there’s really no way around it.” No further information has been made available indicating how thoroughly the stormwater volume control has been considered. However, review of the volume that will be needed suggests it may be a costly undertaking.

The 1.1 inch standard equates to a volume of 50,417 cubic feet that must be retained on the property for the new impervious surface. Conventional, surficial systems for stormwater retention and

### **Figure 1. Proposed Floodplain Impacts**





Date: 3/12/2018 11:09:59 PM Author: ejensen Document Path: X:\Clients\Municipal\00518\_West\_Lakeland\0002\_Lake Elmo\_Airport\_Review\09\_GIMS\_ProjectName\GIS\RM\_Floodplain.mxd

**FIGURE 5-4**  
Preferred Alternative Wetland Impacts  
Lake Elmo Airport  
Environmental Assessment



**Legend**  
Flood Hazard Zone



**Lake Elmo Airport  
Floodplain Impacts**



infiltration will not be feasible due to poor soils. VBWD Hydrologic Soil Group mapping shows that the soils in the area exhibit moderate/low infiltration (HSG C). A maximum ponding depth of 0.8 inches will be allowed to achieve the 48 hour drawdown period required by the MPCA

155

NPDES Construction Stormwater Permit standards (VBWD Rule 2.6.E.iii). The required storage/infiltration feature would cover over 75,000 square feet of space on the airport property. Figure 5-5 (Airfield Drainage Map) of the Draft EAW shows “Proposed Infiltration Basin and Temporary Storage” basins located in various parts of the proposed airport. Two of the basins are located adjacent to wetlands. These basins are unlikely to infiltrate water adequately because soils near wetlands are frequently saturated and unable to infiltrate more water or convey water away from the infiltration basin.

156

The EAW is inadequate because it presents a plan for stormwater management that will not meet watershed district standards and therefore will cause significant environmental effects.

### 3. Wetland Management Standards

157

Table 2 below shows VBWD Wetland Management Standards and Guidelines. Stormwater discharge to wetlands must meet standards that limit the amount of wetland bounce and period of inundation that range from maintaining the existing condition to allowing up to two feet of additional bounce for the 10-year, 24-hour event based on the management classification. Wetlands on the airport property are classified as either “Manage 1” or “Manage 2.”

Meeting the VBWD Wetland Management Standards and Guidelines may require stormwater management above and beyond the 1.1-inch volume control requirement under VBWD Rule 2 due to the larger volume of runoff to be managed for these events. The EAW is deficient because it does not evaluate the wetland bounce created by the project, which is a significant environmental impact.

### 4. Water Quality Impacts to Downs Lake

158

The Lake Elmo Airport is in the Downs Lake Watershed, so surface water leaving the proposed runway areas will eventually flow to Downs Lake. Downs Lake is classified as a shallow lake by the Minnesota Pollution Control Agency (MPCA). Downs Lake is currently listed as impaired for aquatic recreation by the MPCA due to nutrients, eutrophication, and biological indicators, and is included in the MPCA’s 303(d) impaired waters list because of excessive nutrients. The VBWD classified Downs Lake as a High Priority waterbody according to its waterbody classification system, due to the lakes inclusion in the MPCA’s impaired waters list.

159

The VBWD has a non-degradation water quality policy which sets “action triggers” for all of its major waterbodies. Action triggers for VBWD lakes consider the following water quality parameters relative to MPCA water quality standards and prior water quality data (i.e., trend analysis):

- Secchi disc depth
- Total phosphorus
- Chlorophyll *a*

160

Increase stormwater runoff due to the proposed expansion of impervious surfaces at the Lake Elmo Airport will increase the loading of nutrients to Downs Lake. This loading will contribute to the further degradation of Down’s Lake due to eutrophication, which is a significant environmental impact.

**Table 2. VBWD Wetland Management Standards and Guidelines**

Management Class	Average Buffer <sup>2,3,4</sup>	Hydrologic Guidelines
<b>A-Preserve</b>	100 feet  Monuments required marking buffer edge.	<i>Bounce (10-year, 24-hour):</i> Existing <i>Inundation<sup>5</sup> (1- &amp; 2-year, 24-hour):</i> Existing <i>Inundation<sup>5</sup> (10-year, 24-hour):</i> Existing <i>Runout Control:<sup>6</sup></i> No Change Maintain existing hydrology: (The runoff volume flowing into the wetland from a 2-year 24-hour event cannot be changed by more than 10% <sup>7</sup> ) Encourage infiltration and reduced impervious BMPs Conduct water budget analysis
<b>B-Manage 1</b>	75 feet  Monuments required marking buffer edge.	<i>Bounce (10-year, 24-hour):</i> Existing + 0.5 feet <i>Inundation<sup>5</sup> (1- &amp; 2-year, 24-hour):</i> Existing plus 1 day <i>Inundation<sup>5</sup> (10-year, 24-hour):</i> Existing + 7 days <i>Runout Control:<sup>6</sup></i> No Change Maintain existing hydrology: (The runoff volume flowing into the wetland from a 2-year 24-hour event cannot be changed by more than 10% <sup>7</sup> ) Encourage infiltration and reduced impervious BMPs
<b>C-Manage 2</b>	50 feet	<i>Bounce (10-year, 24-hour):</i> Existing + 2.0 feet <i>Inundation<sup>5</sup> (1- &amp; 2-year, 24-hour):</i> Existing plus 5 days <i>Inundation<sup>5</sup> (10-year, 24-hour):</i> Existing + 14 days <i>Runout Control:<sup>6</sup></i> 0 to 2.0 feet above existing runout Runoff volume flowing into the wetland from a 2-year 24-hour event cannot be changed by more than 25% <sup>7</sup>

<sup>1</sup> Modified from Minnesota Routine Assessment Method For Evaluating Wetland Functions, Version 3.0 (MNRAM).

<sup>2</sup> Buffers are unmowed, naturalized strips of vegetation around the perimeter of the wetland. Buffers shall be provided during development or redevelopment. Buffer widths will be measured from the delineated wetland boundary, the OHW, or the normal water level, whichever is greater in elevation. See Rule 4 for details regarding buffers.

<sup>3</sup> A minimum 25 foot vegetative buffer strip is required around the delineated wetland boundary or the OHW, whichever is greater in elevation.

<sup>4</sup> The average buffer widths listed are within the ranges recommended by MNRAM.

<sup>5</sup> Defined as the time period during which wetland water levels are above the outlet elevation following the prescribed storm event.

<sup>6</sup> If currently landlocked, new outlet should be above delineated wetland boundary elevation.

<sup>7</sup> This is not a guideline of MNRAM, but a VBWD standard meant to meet the intent of the Wetland Conservation Act's purpose of avoiding direct or indirect impacts from activities that destroy or diminish the quantity, quality, and biological diversity of wetlands. In lieu of the applicant submitting plans and calculations that show the hydrology of wetlands will not be negatively impacted due to the proposed project, a 5-year wetland monitoring plan shall be submitted and approved by the VBWD Engineer prior to construction. If wetlands are negatively impacted by hydrology changes due to the project, the applicant will need to replace the lost wetlands.

## 5. Water Quantity Impacts to Downs Lake

The VBWD Downs Lake Management Plan states “The small size of Downs Lake (relative to its drainage area), coupled with the fact that Downs Lake has a high overflow point, results in a high potential for flooding. When large quantities of water flow into the lake – as a result of an unusually heavy and long-lasting rainstorm or a sudden spring thaw of heavy snow cover – the lake fills to a point where it overflows. Prior to the lake level reaching the overflow, however, roadways are inundated, and a home and subsurface sewage treatment systems (SSTS) are flooded.” The Plan also states that “The VBWD will cooperate with the City of Lake Elmo and project proposers to identify and evaluate the feasibility of options to mitigate or prevent negative impacts to water levels due to new development within the Downs Lake watershed.”

The proposed Lake Elmo Airport expansion will increase stormwater runoff to Downs Lake because of the expansion of impervious surfaces. Past efforts by the watershed district and residents near Downs Lake to implement flood prevention and mitigation plans have been very



162 | contentious. The EAW is inadequate because it does not discuss the impacts of this additional stormwater runoff on Downs Lake. This is a significant environmental impact.

## 6. Groundwater Impacts

163 | Expansion of the runways at the Lake Elmo Airport will lead to more planes and larger planes using the airport. This in turn will lead to greater fuel storage and distribution, including the potential for new products such as jet fuel. These changes should have been included in the Cumulative Impacts and Cumulative Potential Effects section of the EAW.

164 | The increase in fuel storage is particularly important because it increases the potential for spills and leaks that will impact groundwater. The airport lies within the Baytown/West Lakeland Township Groundwater Contamination Site and Special Well and Boring Construction Area (SWBCA). Following the detection of Volatile organic compounds (VOCs) in the groundwater in 1987 and 1988, the Minnesota Department of Health (MDH) issued a well-drilling advisory (now SWBCA) for portions of West Lakeland Township, Baytown Township, and the City of Bayport. This advisory puts limits on the construction of new wells, and requires additional water testing of new wells. Groundwater contaminants emanating from the airport would further worsen and expand the contamination plume and place an additional burden on residential well owners who already have suspect water supplies. This is a significant environmental impact.

## 7. Contaminated Soils

165 | The source of the contaminated groundwater below the Lake Elmo Airport was long suspected to be at the airport. Later, a contamination source was identified west of the airport. Fuel, degreasers, and other potential contaminants are still used at the airport, particularly in areas where maintenance tasks are performed.

166 | The history of contaminated groundwater in the area of the airport must be a consideration for any future construction plans. It would be prudent to investigate subsurface soils for VOCs and other contaminants prior to any excavation activities. This will add costs that are not currently included in the construction cost estimates.

## 8. Incorrect Evaluation of NPAIS Status

167 | In Section 3.2.2 the EAW uses incorrect and inaccurate information when evaluating whether the Lake Elmo Airport should be included in the National Plan of Integrated Airport Systems, which is a requirement to receive federal funding. The EAW states that:

“FAA Order 5090.3C, Field Formulation of the National Plan of Integrated Airport Systems (NPIAS), states that an airport should be included in the NPIAS if it is more than a 20-mile driving distance, or 30-minute drive time, from the nearest existing or proposed NPIAS airport.”

Table 3-1: Drive Distances and Times from Lake Elmo Airport to Other Airports			
Airport	Drive Distance	Drive Time	
		No Traffic	With Traffic
St. Paul Downtown (STP)	16 miles	19 minutes	30 minutes
South St. Paul (SGS)	17 miles	20 minutes	30 minutes
New Richmond Regional (RNH)	23 miles	24 minutes	35 minutes
Minneapolis-St. Paul International (MSP)	23 miles	28 minutes	55 minutes
Forest Lake (25D)	25 miles	30 minutes	40 minutes
Anoka County-Blaine (ANE)	26 miles	30 minutes	55 minutes
Crystal (MIC)	31 miles	35 minutes	100 minutes
Flying Cloud (FCM)	38 miles	40 minutes	100 minutes
Airlake (LVN)	39 miles	45 minutes	75 minutes

Source: Google. Note: Drive time scenarios reflect the shortest (no traffic) and longest (with traffic) travel times associated with either morning rush (7am-9am) or evening rush (3pm-6pm) traffic periods for a typical business day, using the departure time and date function.

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Actually, the NPAIS guidance says (FAA Order 5090.3C, Section 2-5. P. 13):

“b. An existing airport that is included in an accepted SASP or MASP may be included in the NPIAS if it:

- (1) has at least 10 based aircraft, and
- (2) serves a community located 30 minutes or more average ground travel time (for the purpose of systems analysis, a 20 mile radius is often used as the equivalent of 30 minutes ground travel time) from the nearest existing or proposed NPIAS airport“

Therefore, the EAW uses incorrect criteria when evaluating the significance of the Lake Elmo Airport as a reliever airport. The “average ground travel time” should be used, not the “drive time with traffic”. The Lake Elmo Airport would not qualify for NPIAS funding under these criteria. While this is not an environmental concern, it does indicate that the EAW is inadequate and that further investigation is required.

## 9. Conclusions

The issues discussed in this letter identify mistakes and omissions in the EAW for the proposed Runway 14/32 Relocation/Extension and Associated improvements at the Lake Elmo Airport. These issues are significant environmental impacts, and an Environmental Impact Statement should be required before the project continues any further.

Sincerely,



Stuart Grubb, PG  
Senior Hydrologist

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# MEMORANDUM

# FOCUS ENGINEERING, inc.

Cara Geheren, P.E.	651.300.4261
Jack Griffin, P.E.	651.300.4264
Ryan Stempski, P.E.	651.300.4267
Chad Isakson, P.E.	651.300.4283

Date: March 14, 2018

To: Dan Kylo, Town Chair	Re: Lake Elmo Airport EA/EAW
Cc: Dave Schultz, Road Supervisor	West Lakeland Township, Minnesota
Carrie Seifert, Town Clerk	
From: Ryan Stempski, P.E., Township Engineer	Proposed 30 <sup>th</sup> Street Realignment Review Comments

An engineering review has been completed for the proposed realignment of 30<sup>th</sup> Street and its associated affects.

**WEST LAKELAND TOWNSHIP ORDINANCE:** Performance standards for roadways are listed in Section 8.10 of the Township Ordinances. The following standards are called out by ordinance:

- **8.10.1:** Proposed streets shall conform to the state, county or local road plans or preliminary plans as have been prepared, adopted and/or filed as prescribed by law.
- **8.10.12:** The street arrangements shall not be such as to cause hardship to owners of adjoining property in platting their own land and providing convenient access to it.
- **8.10.17.2:** Drainage easements shall be dedicated around wetlands and DNR designated lakes, rivers and streams up to the 100 year flood elevation or delineated boundary, whichever is greater.

Proposed Road Alignment (Horizontal Curvature):

30<sup>th</sup> Street North is a collector road that is important to the traffic flow of the region. It is currently a straight alignment with a posted speed limit of 55 MPH. This is an ideal route for the community to get from local roads to the County System efficiently and a benefit to the current transportation system. The proposed horizontal curves (in the selected Alternative 3) require a much lower posted speed limit (30 MPH) and will impact this route significantly. The proposed realignment does not provide an equal benefit to what exists today, which does not comply with Ordinance Section 8.10.12.

It also appears that the proposed horizontal curves do not meet state standards (see MnDOT Road Design Manual). The Township requests that the roadway does not include superelevation to meet design speeds for horizontal alignments. Additional detail for each horizontal curve should be provided to confirm minimum state standards are met in compliance with Ordinance Section 8.10.1.

Construction and Long-Term Maintenance:

Constructability of the proposed realignment may prove to be challenging and costlier than reported in the 30<sup>th</sup> Street North Realignment Alternatives Review. The heavy soils (silts and clays) in this location are highly frost susceptible, which are detrimental to the long-term condition of the road. Soil borings will be required to confirm what mitigation efforts may need to be added to the sub-base of the road section. Certain methods may or may not be acceptable to the Township for long-term maintenance. We also have additional concerns with moving the road alignment alongside and within a wetland area. Soils may be saturated and possibly organic, requiring additional solutions to standard road construction (and future reconstruction). All these factors add costs to the



172 | project, delays in construction, and additional maintenance responsibilities for the road authority (ultimately West Lakeland Township). Currently responsibility for maintenance and reconstruction is shared between West Lakeland Township and Baytown Township. The shifting of alignment to a location entirely within West Lakeland Township adds additional responsibility onto West Lakeland that does not exist today.

Flood Elevation Versus the Proposed Road Alignment:

173 | A drainage easement up to the 100-Year HWL of the wetland would be required per Ordinance Section 8.10.17.2. This area would not be allowed to have any portion of the road constructed within it, as its intended purpose is to allow for the 100-Year Storm Event. Furthermore, standard practice in West Lakeland Township is to require that the road base be constructed entirely above the 100-Year HWL to avoid saturation of the road base.

Storm Water Management:

174 | The ownership and maintenance responsibilities of the proposed storm water facilities must be confirmed. The Township does not have staff or resources to take on additional maintenance of these facilities. The proposed infiltration basins must drain within 24 hours of a storm based on requirements within the Aircraft Operating Area. It may not be possible to achieve this type of infiltration rate for the soils anticipated in this area. Should engineered soils be proposed or discovered in-situ through investigation, their ongoing maintenance will be a major responsibility. Sediment, debris, freeze/thaw cycles, and other factors present year-round challenges to meet this type of a drain dry standard in perpetuity.

Wetland Impacts Due to Realignment:

175 | Environmental impacts to existing wetlands will be commented on by the LGU for this area, which is Valley Branch Watershed District.