

# FLYING CLOUD AIRPORT

## APPENDIX D

### METROPOLITAN COUNCIL COMMENTS

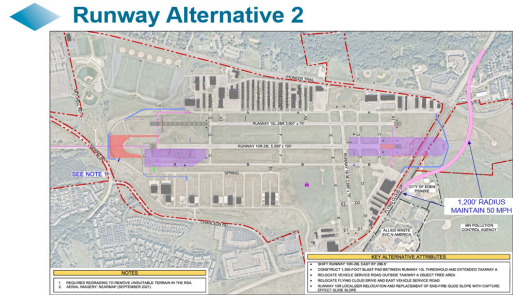
LONG-TERM  
PLAN  
2040



SEPTEMBER 2025

	Metropolitan Council Comments	MAC Response
	General Comments	
1	<p>Dear Mr. Gilles:</p> <p>The Metropolitan Council received the draft Flying Cloud (FCM) Airport 2040 Long Term Comprehensive Plan (Plan) on March 1, 2025. The Council reviews and comments on Airport Long Term Comprehensive Plans for conformance to regional systems, including the Transportation Policy Plan, and consistency with Thrive MSP 2040 and other Council policies. On February 12, 2025, the Council adopted Imagine 2050, which builds on the policy direction in Thrive MSP 2040. As this Plan was developed under Thrive MSP 2040, the conformance and consistency review are based on this guidance. This Plan updates the airport's long term investment plan to 2040 from the previous 2025 planning horizon. This review will serve as the preliminary review of the Plan, but this Plan will still be required to undergo a formal conformance and consistency review for authorization by the Metropolitan Council at a later date.</p> <p>The Plan's preferred alternative will not change the classification of the airport. Long term aviation forecasts indicate that aircraft activity will increase, from 2021 to 2040, but total aircraft operations will remain below previous peaks seen at FCM. The Plan projects aircraft operations to grow at a steady rate to 2040 with jet operations growing the fastest. Due to the airport's location in the southwest metro, it is anticipated that FCM will see nearly half of all business jet operations in the region by 2040. With this growth, noise impacts will also grow, however the analysis indicates that the greatest noise impacts (65 DNL noise contour found on Figure 7-2) will remain entirely on MAC property.</p> <p>As operations are not anticipated to eclipse previous peaks during the planning horizon, the preferred alternative indicates that projects focused on safety and operational improvements will be needed on the airside to maximize the safe and efficient use of the existing airport without expansion. These projects include new and expanded auxiliary taxiways, relocated air traffic control tower, safety improvements for runway 10R-28L, additional space for hangers on the south and north side of the airfield, and a consolidated fuel farm. There are no new or expanded runways planned.</p> <p>FCM already has an airport zoning ordinance in effect with the surrounding communities and projected noise impacts will be minor outside of MAC property, it is not anticipated that this Plan would impact surrounding property. It is not anticipated that the activity projections or proposed projects will have an impact on the regional transportation system.</p>	Comment acknowledged
2	There are multiple references in the document which show as an error in the text. These errors should be fixed.	The PDFs were processed through an accessibility review which sometimes creates errors. Will review the PDFs for these errors prior to final publication.
3	(Section 1.3) It should be noted that the Met Council is reviewing airport classifications as part of its update to the TPP Aviation System Plan and may delineate Minor Airports to better identify these facilities' role in the regional system. However, state law dictates which airports are classified as Minor	Section 1.2.2 denotes Metropolitan Council classification and role and that it is subject to change based on Metropolitan Council guidance.
4	(Section 2.1.1) Clarify if there any link to the ADSB mandate coming into effect for all aircraft and increased tracking technology to the large increase seen from 2014-2021 or 2019-2020. Reporting was used later to explain based aircraft number declines but is not discussed in relation to historic operational data or trends.	The ADSB mandate impacted MACNOMs ability to better track operational data, but historical activity (on Table 2.1) is attributed to economic recovery (2014-2019), increased flight training activity with opening of ATP Flight School in 2020, and temporary shift in flight training activity due to COVID lockdowns with nearby flight school universities (2020-2021)
5	Table 2-1 (and others) when referencing the difference between MACNOMS and OPSNET data, please also include the OPSNET values for clarity on the stated operation count difference.	The forecast chapter must be approved by the FAA, and was approved in January of 2023. MAC followed FAA formatting. OPSNET data comparison is provided at the end of the chapter (IE Tables 2-38 and 2-40 for example)
6	The Plan indicates that a stakeholder and tenant outreach process was conducted to determine if policies constrain demand at the airport (Section 2.24). Please provide the results of this process and discussion on how this influenced the Plan.	The tenant outreach process involved the Stakeholder Advisory Panel (SAP) and public outreach events and included the conversation/feedback received during these events were the driver in validating assumptions. As a result, no tangible results can be summarized. It should be reiterated the FAA approved the forecast as per their guidance.

	Metropolitan Council Comments	MAC Response
7	A report on all conducted engagement activities should be provided as part of this plan. This was included as Chapter 9 of the previous FCM LTCP.	The MAC considers the Metropolitan Council Consistency Review Process as the final public engagement piece. As a result, this chapter is published at the conclusion of the LTP consistency review process as a part of the final report document. This format was applied to the recently completed MSP 2040 LTP.
8	Forecasts for helicopter operations and based aircraft (2.35) do not increase through the planning horizon. Clarify if the MAC considered future helicopter-like (eVTOL and similar aircraft in development) operations at FCM in future years in these forecasts. If not, this type of operation may increase in the future at the airport as demand may grow for this type of aircraft with the large amount of business jet activity taking place at the airport and impending certification of eVTOL aircraft (~45% share of metro private jet activity forecasted by 2040).	There are many barriers to entry in the eVTOL space when considering general aviation activity and intended uses (cargo, personal, medical). A primary driver of intended use is the accessibility of charging stations and electrical grid space/availability. These barriers will prevent notable impacts to aviation activity forecast efforts for at least one more planning cycle. MAC will continue to monitor the eVTOL market in future reliever LTP studies, some discussion about it will occur in the current 2045 STP LTP, but at the time of the FCM 2040 LTP the consideration to this having an effect on helicopter operations was negligible. MAC is also interested in and will continue to monitor the current MnDOT MEAN study, which will summarize existing/future electrical grid availability.
9	The Plan notes (Section 3.19) that the VOR is on the FAA's list for decommissioning in the near future. Clarify if this infrastructure will also be removed at this time.	Distance Measuring Equipment (DME) is existing and collocated with the VOR. When the VOR is decommissioned, the infrastructure will remain in-place as indicated by FAA staff. This is noted on the FAA draft Airport Layout Plan (ALP).
10	Table 3-32 projects the required hanger demand to 2040. For helicopters, the forecasts indicate that based helicopters will increase to 8 by 2040 from 6 today, but the hanger demand remains 6. For jet aircraft, the forecast indicates 70 jets based at the airport by 2040 while table 3-32 shows a demand for 89 hanger stalls for jet aircraft. Understanding itinerant needs, this appears to be a large surplus. Please expand upon these discrepancies in the forecasts and hanger demand analysis.	<p>The estimation of hangared aircraft demand is a mix of single-use and multi-use hangars, depending on the type of owner (training facilities tend to house more than one aircraft per hangar). In the instance of helicopter operations at FCM, they are primarily training operators so adding two based helicopters over 20 years may not impact the demand in quantity of hangars required.</p> <p>Regarding jet hangar demand - This is also tied to the need of balancing demand for based aircraft tenants vs transient jet aircraft hangar demand. there is pent up demand for 1) current based aircraft desiring their own hangar 2) future based aircraft pent up demand that cannot base at FCM for line-of-sight challenges from the Air Traffic Control Tower (ATCT) that impede the growth of the southwest building area and 3) a high-level of demand for transient aircraft to be stored in a hangar during winter months (a notable comment from FBOs on the field that transient aircraft much prefer indoor storage during winter months).</p>

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11	Alternative figures (Section 4) would be improved for clarity with approximate dimensions included in the figures and it would be helpful to identify the taxilanes/taxiways on the figures.	MAC has intentionally left labeling and dimensions off of the alternative graphic to address public comments about the complexity of the drawings to simplify the information for them to digest. It allows the focus to remain on the legend and higher-level ideas of implementation strategies of taxiways, EMAS beds, and runway concepts. The beginning of the chapter does have some dimensions/labels in Figure 4-1 to remind the viewer of the discussions held in public outreach efforts what standards are being considered to address in the alternative section.
12	Figure 4.3 shows Alternative 2 which shows the potential relocation of Spring Road and installation of EMAS beds and blast pads to runway 10R-28L. The description for Alternative 2 states this figure displays a runway shift and the relocation of Flying Cloud Drive. Please clarify details in the alternative considerations and or review figures for consistency with the text.	<p>The incorrect alternative is depicted in Figure 4-3. Will reconcile to the correct graphic presented during FCM Discover Event #3:</p> <p></p> <p><b>Runway Alternative 2</b></p> <p>1. 100' RADIUS MAINTAIN 100 MPH</p> <p>2. 100' RADIUS MAINTAIN 100 MPH</p> <p>3. 100' RADIUS MAINTAIN 100 MPH</p> <p>4. 100' RADIUS MAINTAIN 100 MPH</p> <p>5. 100' RADIUS MAINTAIN 100 MPH</p> <p>6. 100' RADIUS MAINTAIN 100 MPH</p> <p>7. 100' RADIUS MAINTAIN 100 MPH</p> <p>8. 100' RADIUS MAINTAIN 100 MPH</p> <p>9. 100' RADIUS MAINTAIN 100 MPH</p> <p>10. 100' RADIUS MAINTAIN 100 MPH</p> <p>11. 100' RADIUS MAINTAIN 100 MPH</p> <p>12. 100' RADIUS MAINTAIN 100 MPH</p> <p>13. 100' RADIUS MAINTAIN 100 MPH</p> <p>14. 100' RADIUS MAINTAIN 100 MPH</p> <p>15. 100' RADIUS MAINTAIN 100 MPH</p> <p>16. 100' RADIUS MAINTAIN 100 MPH</p> <p>17. 100' RADIUS MAINTAIN 100 MPH</p> <p>18. 100' RADIUS MAINTAIN 100 MPH</p> <p>19. 100' RADIUS MAINTAIN 100 MPH</p> <p>20. 100' RADIUS MAINTAIN 100 MPH</p> <p>21. 100' RADIUS MAINTAIN 100 MPH</p> <p>22. 100' RADIUS MAINTAIN 100 MPH</p> <p>23. 100' RADIUS MAINTAIN 100 MPH</p> <p>24. 100' RADIUS MAINTAIN 100 MPH</p> <p>25. 100' RADIUS MAINTAIN 100 MPH</p> <p>26. 100' RADIUS MAINTAIN 100 MPH</p> <p>27. 100' RADIUS MAINTAIN 100 MPH</p> <p>28. 100' RADIUS MAINTAIN 100 MPH</p> <p>29. 100' RADIUS MAINTAIN 100 MPH</p> <p>30. 100' RADIUS MAINTAIN 100 MPH</p> <p>31. 100' RADIUS MAINTAIN 100 MPH</p> <p>32. 100' RADIUS MAINTAIN 100 MPH</p> <p>33. 100' RADIUS MAINTAIN 100 MPH</p> <p>34. 100' RADIUS MAINTAIN 100 MPH</p> <p>35. 100' RADIUS MAINTAIN 100 MPH</p> <p>36. 100' RADIUS MAINTAIN 100 MPH</p> <p>37. 100' RADIUS MAINTAIN 100 MPH</p> <p>38. 100' RADIUS MAINTAIN 100 MPH</p> <p>39. 100' RADIUS MAINTAIN 100 MPH</p> <p>40. 100' RADIUS MAINTAIN 100 MPH</p> <p>41. 100' RADIUS MAINTAIN 100 MPH</p> <p>42. 100' RADIUS MAINTAIN 100 MPH</p> <p>43. 100' RADIUS MAINTAIN 100 MPH</p> <p>44. 100' RADIUS MAINTAIN 100 MPH</p> <p>45. 100' RADIUS MAINTAIN 100 MPH</p> <p>46. 100' RADIUS MAINTAIN 100 MPH</p> <p>47. 100' RADIUS MAINTAIN 100 MPH</p> <p>48. 100' RADIUS MAINTAIN 100 MPH</p> <p>49. 100' RADIUS MAINTAIN 100 MPH</p> <p>50. 100' RADIUS MAINTAIN 100 MPH</p> <p>51. 100' RADIUS MAINTAIN 100 MPH</p> <p>52. 100' RADIUS MAINTAIN 100 MPH</p> <p>53. 100' RADIUS MAINTAIN 100 MPH</p> <p>54. 100' RADIUS MAINTAIN 100 MPH</p> <p>55. 100' RADIUS MAINTAIN 100 MPH</p> <p>56. 100' RADIUS MAINTAIN 100 MPH</p> <p>57. 100' RADIUS MAINTAIN 100 MPH</p> <p>58. 100' RADIUS MAINTAIN 100 MPH</p> <p>59. 100' RADIUS MAINTAIN 100 MPH</p> <p>60. 100' RADIUS MAINTAIN 100 MPH</p> <p>61. 100' RADIUS MAINTAIN 100 MPH</p> <p>62. 100' RADIUS MAINTAIN 100 MPH</p> <p>63. 100' RADIUS MAINTAIN 100 MPH</p> <p>64. 100' RADIUS MAINTAIN 100 MPH</p> <p>65. 100' RADIUS MAINTAIN 100 MPH</p> <p>66. 100' RADIUS MAINTAIN 100 MPH</p> <p>67. 100' RADIUS MAINTAIN 100 MPH</p> <p>68. 100' RADIUS MAINTAIN 100 MPH</p> <p>69. 100' RADIUS MAINTAIN 100 MPH</p> <p>70. 100' RADIUS MAINTAIN 100 MPH</p> <p>71. 100' RADIUS MAINTAIN 100 MPH</p> <p>72. 100' RADIUS MAINTAIN 100 MPH</p> <p>73. 100' RADIUS MAINTAIN 100 MPH</p> <p>74. 100' RADIUS MAINTAIN 100 MPH</p> <p>75. 100' RADIUS MAINTAIN 100 MPH</p> <p>76. 100' RADIUS MAINTAIN 100 MPH</p> <p>77. 100' RADIUS MAINTAIN 100 MPH</p> <p>78. 100' RADIUS MAINTAIN 100 MPH</p> <p>79. 100' RADIUS MAINTAIN 100 MPH</p> <p>80. 100' RADIUS MAINTAIN 100 MPH</p> <p>81. 100' RADIUS MAINTAIN 100 MPH</p> <p>82. 100' RADIUS MAINTAIN 100 MPH</p> <p>83. 100' RADIUS MAINTAIN 100 MPH</p> <p>84. 100' RADIUS MAINTAIN 100 MPH</p> <p>85. 100' RADIUS MAINTAIN 100 MPH</p> <p>86. 100' RADIUS MAINTAIN 100 MPH</p> <p>87. 100' RADIUS MAINTAIN 100 MPH</p> <p>88. 100' RADIUS MAINTAIN 100 MPH</p> <p>89. 100' RADIUS MAINTAIN 100 MPH</p> <p>90. 100' RADIUS MAINTAIN 100 MPH</p> <p>91. 100' RADIUS MAINTAIN 100 MPH</p> <p>92. 100' RADIUS MAINTAIN 100 MPH</p> <p>93. 100' RADIUS MAINTAIN 100 MPH</p> <p>94. 100' RADIUS MAINTAIN 100 MPH</p> <p>95. 100' RADIUS MAINTAIN 100 MPH</p> <p>96. 100' RADIUS MAINTAIN 100 MPH</p> <p>97. 100' RADIUS MAINTAIN 100 MPH</p> <p>98. 100' RADIUS MAINTAIN 100 MPH</p> <p>99. 100' RADIUS MAINTAIN 100 MPH</p> <p>100. 100' RADIUS MAINTAIN 100 MPH</p>
13	Table 7.2 title should read Metropolitan Council and not County.	Will correct the typo
14	The Plan notes and figure 7.3 confirms that there are custom safety zones in use at FCM. The Plan should include details on those custom safety zones. Section 7.2.3.1 appears to describe the standard zones in state law and does not discuss the custom safety zones specific to FCM.	Section 7.2.3.1 will be updated to clarify the custom zoning ordinance, which is depicted in Figure 7-3, vs. what a Commissioner Standard ordinance is.
15	Figures 7.2 and 7.3 seem to be mixed up in the section.	Figure 7-3 should be promoted to Page 7-18 after Section 7.2.3.2 as Figure 7-1. Existing Figure 7-1 will become Figure 7-2, and Existing Figure 7-2 will become Figure 7-3.
16	Met Council staff request updated noise contour GIS data from the MAC to update this information in the TPP Aviation System Plan.	MAC will provide updated contour information to Met Council
<b>Preferred Alternative Considerations (Figure 5-1 to 5-4)</b>		
17	Met Council staff confirm that the addition of blast pads and EMAS beds to Runway 10R-28L (#1 and #2) are not considered an extension of the runway length beyond 5,000 feet.	MAC affirms this assumption. Blastpads and EMAS beds are used for conformance of the existing runway condition to FAA design standards, of which is limited by statute to 5,000 feet

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18	The preferred alternative for the FCM LTCP proposes to partially remove existing park facilities (Section 4(f) resource) located on MAC property (#9). Impacts and potential mitigation should be considered, and the MAC should coordinate with the City of Eden Prairie on any reductions to existing park space located on MAC property.	MAC has ongoing conversations with the City of Eden Prairie regarding lease agreements between the city and MAC for the ball field/soccer field area. As per FAA requirements, MAC is required to show adequate space is available for aeronautical purposes through the 20-year planning cycle and is done so with the proposed preferred alternative. MAC will continue to monitor lease terms with Eden Prairie officials and take appropriate action to reallocate this space for aeronautical need as required in the future. For now, the plan meets the FAA obligation requirements and is not a guarantee yet that the forecasted growth will occur and require the change in use. At the time of proposed development, appropriate environmental considerations will be given, which will be approved by the FAA prior to any construction.
19	Project #5 shows a realignment to a northern access onto a county road. The Plan notes this work will require improvements on Pioneer Trail. The MAC will need to coordinate with and receive approval from Hennepin County prior to making any access or movement changes to the roadway.	Comment acknowledged. MAC will take appropriate steps to coordinate with Hennepin County and Eden Prairie officials ahead of construction impacts to Pioneer Trail.
20	The preferred alternative graphics should show the necessary connecting pavement work needed for the ATCT (#7) to be installed with that project and not in later phases.	MAC will adjust Figure 5-2 to depict the roadway and parking lot associated with ATCT relocation project (#7). Noted the ATC cab is missing from Figure 5-2 and will be added as well.
<b>Environmental Considerations</b>		
21	The previous FCM Plan included figures depicting general airport drainage patterns (figure 1.24) and sewer and water locations (figure 1.25), these figures would aid in plan review. Please provide these figures here as well, if available.	Drainage figures are not available from this LTP update and is not typical for a LTP update document for airports. When potential projects are programmed/funded, they will move through an environmental review process in which drainage will be considered at that point (and through the design/construction phases) as the typical process for airport projects.
22	Section 5.2 outlines potential environmental reviews for outlined projects in the Plan. This list should include state environmental review requirements which may apply to proposed projects in the Plan per Minn. Stat. §473.614, Subd. 2.	A note will be added in Section 5.2 acknowledging the state environmental review process as per statute
23	PFAS is found in airport firefighting foam. The FAA now recommends switching to fluorine-free foam, which does not contain PFAS. We recommend switching to this PFAS free foam if the airport has not already.	Reliever airports do not have on-site Aircraft Rescue and Fire Fighting (ARFF) equipment, but instead has mutual-aid agreements with adjacent cities for responses to aircraft incidents. Comment is noted, but does not apply to FCM.
24	We recommend considering the incorporation of filtration basins to help prevent the contamination of groundwater and soil via deicing chemicals and other chemicals and hazardous materials utilized by the airport.	Airport LTPs do not involve this level of detail, but instead is considered during the environmental, as well as design and construction, phases in project development.
25	The Flying Cloud Airport Long-Term Comprehensive Plan and current MAC policy lack clarity regarding well abandonment and sealing procedures and responsibilities, for tenants and MAC. Siting, construction, maintenance, and abandonment should follow state rules and Minnesota Department of Health (MDH) guidance (MDH: sealing unused wells). Hennepin County and the state of Minnesota manage programs to assist private well owners with well sealing and abandonment costs.	Airport LTPs do not involve this level of detail, but instead is considered during the environmental, as well as design and construction, phases in project development.
26	New tenants or developments within the airport that connect to municipal water supply services should assess their water demands and work with the city of Eden Prairie to ensure those demands can be met and align with the city's System, Local Water Supply, and Comprehensive Plans. These plans estimate future water needs and associated infrastructure. They also include strategies and actions to conserve and use water efficiently.	Airport LTPs do not involve this level of detail, but instead is considered during the environmental, as well as design and construction, phases in project development.

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27	Section 1.8.7.4 of the Plan states that soils within the site have a high rate of transmission. Infiltration and recharge of the groundwater system may be high in this area, where impervious surfaces like runways are not present. The site borders the Flying Cloud Sanitary Landfill, identified by the Minnesota Pollution Control Agency (MPCA) as a site of groundwater concern. This closed landfill site is part of an MPCA remediation program. The MAC should work with Hennepin County and the MPCA to ensure that there are no conflicts with the Plan and that spill preparedness and response plans are in place to protect groundwater and surface water from contamination.	Airport LTPs do not involve this level of detail, but instead is considered during the environmental, as well as design and construction, phases in project development.
Forecasts		
28	Table 2.6 is a population, employment and economic activity forecast that was produced in 2021; this is an obsolete forecast. Met Council revised the macroeconomic forecast in 2023. This most recent forecast reduced future growth rates substantially; it is published at <a href="https://metro council.org/forecasts/">https://metro council.org/forecasts/</a> .	Comment acknowledged. At the time the forecast was developed in 2021-2022, this was the current information. This macro information does not have a substantial impact to the aviation activity forecast, of which was approved by the FAA in January of 2023. As a result in 1) timeline of forecast developed, 2) small impact to the overall aviation activity forecast, and 3) FAA approval of the forecast in January of 2023, the table will not be updated.
29	Most of the projections series presented in Chapter 2 concern flight operations and the mix of aircraft/operation types. Council staff do not know what leverage or significance the macroeconomic forecast has for these projected results. Possibly the macroeconomic forecast is not a direct data input to any of the flight operations projections; in that case, table 2.6 should be easy to update, with no consequence for the rest of the chapter. Understanding that these projections were created before the updated forecast were published, the update is advised and not required.	Comment acknowledged. Based on MAC response of comment #28 and the notion that updated Met Council information is preceded by the LTP forecast approval by the FAA, MAC will not be updating the table.
Concluding Statement		
30	This will conclude the Council's preliminary review of the draft Flying Cloud Airport (FCM) 2040 Long Term Comprehensive Plan. The Council will not take formal action on the Plan at this time. If you have any questions or need further information, please contact Joe Widing, Principal Reviewer, at 651-602-1822 or via email at <a href="mailto:joseph.widing@metc.state.mn.us">joseph.widing@metc.state.mn.us</a> .	Comment acknowledged