Metropolitan Airports Commission
Hearing Officers’ Report

April 4, 2018, Public Hearing on the
Draft Federal Environmental Assessment (EA) /
State of Minnesota Environmental Assessment Worksheet
(EAW) for Lake Elmo Airport Runway 14/32
Relocation/Extension and Associated Improvements

The Metropolitan Airports Commission (MAC), in coordination with the Federal Aviation Administration (FAA), prepared a joint Draft EA/EAW for proposed improvements at Lake Elmo Airport. MAC approved publication of the Draft EA/EAW in February 2018 (Item A) and published the Draft EA/EAW for public and agency comment on February 26, 2018.

A public hearing was conducted at 7:00 p.m. on April 4, 2018, at the Oak-Land Middle School, Auditorium, to receive verbal and written comments on the Draft EA/EAW. The MAC held the public hearing pursuant to Minnesota Statutes Chapter 473, and published public notice of the hearing in local newspapers, the Minnesota Environmental Quality Board (EQB) Monitor newsletter, and the Minnesota State Register (Item B).

Present at the public hearing were the following Metropolitan Airport Commission Commissioners, who served as Hearing Officers: Steve Cramer, Chair (Planning, Development & Environment Committee Chair), Daniel Boivin (Commission Chair), Rick King (Management and Operations Committee Chair), Michael Madigan (District F Commissioner), and Richard Ginsberg (District G Commissioner). MAC staff present at the public hearing included Cameron Boyd (General Counsel), Jenn Felger (Planning, Development and Environment Committee Secretary), Roy Fuhrmann (Chief Operating Officer), Andrew Hanson (Law Clerk), Joe Harris (Airport Manager, St. Paul Downtown and Lake Elmo), Pat Hogan (Director – Public Affairs and Marketing), Brad Juffer (Assistant Manager – Noise, Environment and Planning), Mitch Kilian (Associate Vice President – Governmental Affairs), Chad Leqve (Director – Environment), Dana Nelson (Manager – Noise, Environment and Planning), Neil Ralston (Airport Planner), Bridget Rief (Vice President – Planning and Development), Brian Ryks (Executive Director/Chief Operating Officer), Atif Saeed (Vice President – Finance and Revenue Development), Gary Schmidt (Director – Reliever Airports), and Evan Wilson (Senior Attorney). Representatives from the professional services consulting firm retained by MAC to prepare the Lake Elmo Airport EA/EAW documentation, Mead & Hunt, were also in attendance.

Eighty-seven (87) individuals signed in on the Lake Elmo Airport EA/EAW meeting attendance sheets (Item C).

Prior to the official start of the Public Hearing, a public open house was held at 6:00 p.m. and an overview presentation was provided at 6:30 p.m. (Item D).
Following introductory statements presented by Chair Cramer, all persons in attendance and wishing to do so were given the opportunity to testify and introduce evidence regarding the Draft EA/EAW. Sixteen (16) individuals provided testimony at the Public Hearing. The proceedings of the Public Hearing were transcribed by a qualified court reporter (Item E).

The public hearing record was kept open until 5:00 p.m. on April 19, 2018, to receive written comments from interested parties. During the public comment period, the MAC received 86 comments from 71 individual members of the general public, including verbal and written comments submitted at the April 4 public hearing, mailed comments, and emailed comments. The MAC received an additional seven written comments within one week after the close of the public comment period, three of which came from individuals who had not previously commented. Of the 74 individual members of the public who submitted comments, 46 opposed the project, 26 supported the project, and two were neutral or their position could not be reliably identified. Eight individuals submitted multiple comments. All verbal and written comments, and MAC’s responses, are incorporated herein (Item F).

The MAC also received comment letters from nine municipalities and agencies, including the Minnesota Department of Agriculture, the Minnesota Department of Transportation, the Minnesota Department of Natural Resources, the Valley Branch Watershed District, the Washington Conservation District, the Washington County Public Works Department, the Minnesota Pollution Control Agency, the U.S. Environmental Protection Agency, and West Lakeland Township. All municipality and agency comments, and MAC’s responses, are incorporated herein (Item G).

Additional documents relating to the public process for the Draft EA/EAW, including the Draft EA/EAW published on February 26, 2018, are available on the project website at

Item A –
Approval to Publish Draft EA/EAW
MEMORANDUM

TO: Planning, Development and Environment Committee

FROM: Chad Leqve – Director of Environment (725-6326)

SUBJECT: LAKE ELMO AIRPORT ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL ASSESSMENT WORKSHEET – REQUEST TO PUBLISH DRAFT DOCUMENT FOR PUBLIC COMMENT AND APPOINT PD&E COMMITTEE AS HEARING OFFICERS

DATE: January 28, 2018

In February 2017, the Metropolitan Airports Commission (MAC) initiated the federal and state environmental review processes for the Lake Elmo Airport enhancements detailed in the Lake Elmo Airport 2035 Long-Term Comprehensive Plan (LTCP) that was adopted in September 2016. This environmental review process addresses both federal (National Environmental Policy Act – NEPA) and state (Minnesota Environmental Policy Act – MEPA) environmental review requirements in the form of a joint federal Environmental Assessment (EA) and a state Environmental Assessment Worksheet (EAW).

The EA/EAW process has been proceeding on schedule with draft document preparation nearing completion in alignment with the below project timeline.
At the February 6, 2018, Planning Development and Environment (PD&E) Committee meeting, staff will be seeking approval to publish the draft document and hold a public comment period with the appointment of PD&E as the hearing officers for the associated public hearing.

By way of background, in addition to addressing NEPA activities such as defining the purpose and need for the development, analyzing development alternatives, and assessing environmental consequences in the form of required impact categories, this process has placed a new level of priority on stakeholder engagement. This resulted in a Stakeholder Engagement Plan (SEP) that placed a strategic focus on enhancing stakeholder participation throughout the entire planning process. The SEP also resulted in more effective information distribution via multiple communication platforms.

The following provides additional detail on these planning components along with staff’s requested action.

**Stakeholder Engagement Plan**

Stakeholder engagement is not a new concept to the MAC; however, a new strategy in the form of a Stakeholder Engagement Plan was developed to guide the effective engagement of multiple stakeholders. The SEP was developed as a central component of the planning process describing the coordination and communication efforts intended to inform, educate, and engage the public and airport users, as well as the approach for documenting the outreach process. The SEP was crafted with 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

The entire SEP strategy document is available on the project website by clicking here.

In addition to development of a comprehensive project website (available by clicking here), the SEP details in-person presentations including public events (three held to-date, additional information on these public events is accessible on the project website by clicking here), newsletters, E-news subscription service, and public notices.

The Community Engagement Panel (CEP) is a central component of this strategy. Additional detail on the CEP is available on the project website by clicking here. The CEP is comprised of representatives from the City of Lake Elmo (2), Baytown Township (2), West Lakeland Township (2), Airport Tenants/Users (2), MAC Staff (2), MAC Commissioner (Madigan), the Greater Stillwater

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1 The website address is https://www.metroairports.org/General-Aviation/Lake-Elmo-Environmental-Assessment/Overview.aspx.
Chamber of Commerce (1), and Washington County Public Works (1). To-date the CEP has met five times with agenda items spanning:

- MAC purpose and mission, environmental process overview, SEP, and CEP guidelines
- Public event debriefs - enhancements, purpose and need, alternatives, and evaluation criteria
- Addressing public questions/input (i.e. 30th Street North realignment alternatives) and identification of a preferred alternative
- Environmental effects overview
- Draft EA/EAW publication, plan for soliciting/documenting/incorporating public comments into Final EA/EAW, public hearing format and guidelines

Specifically, stakeholder input fostered by the CEP has been used to help determine the alternatives evaluated, the screening criteria used in the evaluation, and when and how to communicate with the public. Additionally, the CEP has been central in helping to guide a Frequently Asked Questions section (available by clicking here) on the project website which is updated regularly based on CEP guidance in response to questions or concerns from the community.

Since February 2017, the meeting process for both CEP meetings and public events has evolved in response to stakeholder input. A dedicated comment period was added to each CEP meeting for citizens attending the meeting and who are not on the panel. Additionally, staff has hired a professional facilitator, Todd Streeter of Community Collaboration, for enhanced facilitation during the public events.

Staff intends to continue to refine and evolve the Lake Elmo Airport EA/EAW stakeholder engagement strategy so it can be used as a model for future airport and environmental planning efforts at all MAC system airports, including Minneapolis-St. Paul International Airport (MSP).

**Project Purpose and Need**
The purpose of the proposed action to be outlined in the EA/EAW has been identified based on three goals that were included in the LTCP for Lake Elmo Airport:

- Address and attend to the airport’s failing end-of-life infrastructure
- Enhance safety for airport users and neighbors
- Improve facilities for the types of aircraft using the airport

The need for the project is based on the following specific objectives:

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

In review of the specific components of the purpose and need for the project during CEP discussions and public events, the dialogue included focus on detailing aircraft operator needs as a project driver, using existing airport facilities in other communities (i.e. New Richmond) and aircraft operations forecasts that included further refinements using MACNOMS and FAA aircraft operations data.

**Alternatives Analysis and Preferred Alternative**
The project team analyzed a comprehensive range of design concepts for the primary runway (14/32) and 30th Street North roadway realignment. Alternatives for Runway 14/32 were only
considered if they would avoid or minimize changes to airport use and aircraft flight patterns, maintain runway orientations and avoid or minimize land acquisition.

A total of eight Runway 14/32 alternatives were considered, plus a “No-Action” alternative. The No-Action alternative includes rehabilitating the existing runway and taxiway infrastructure and is carried forward for a baseline comparison to the preferred alternative in the Environmental Effects evaluation. The eight Runway 14/32 alternatives were evaluated using the process shown in the graphic below:

Two alternatives met the screening criteria shown in Tier B above: “Alternative B” (the original preferred alternative from the LCTP which proposed a primary runway extension to 3,600 feet) and “Alternative B1” which was the LTCP refined preferred alternative proposing a more modest primary runway extension to 3,500 feet to address community concerns. The following objective practicability and environmental factors were used to further evaluate the two alternatives:

**Practicability Factors:**
- Construction costs
Logistical factors

Environmental Factors
- Wetland fill area
- Tree clearing area
- Residential parcels with structures in model state safety zone A
- Residential parcels with structures in model state safety zone B
- Private properties within 65 DNL noise contour

When comparing these alternatives using the above factors, Alternative B1 outperformed Alternative B and is therefore being carried forward as the preferred alternative for the primary runway in the Draft EA/EAW.

Regarding the realignment of 30th Street North, the project team took a closer look at the design alternatives to address the two primary concerns expressed by some members of the CEP: increased travel time (including impacts to emergency response times) and safety. In addition to the three roadway concepts from the LTCP, the EA/EAW process identified two additional concepts that would effectively improve travel time and safety aspects of the roadway design. However, based on further CEP review and feedback, the preferred alternative for the roadway design will be “Alternative 3” which is the refined preferred alternative in the LTCP.

The preferred alternative evaluated in the EA/EAW will also include an extended crosswind runway (4/22) by 254 feet to the northeast and upgraded instrument approaches, consistent with the LTCP. The EA/EAW process did not produce alternatives beyond the preferred alternatives presented in the LCTP for these categories.

In total, the proposed action includes 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, realign 30th Street North around the new Runway 32 Runway Protection Zone (RPZ) to reconnect with the existing Neal Avenue North intersection, and convey new public road right-of-way to appropriate local municipality/municipalities.
- Relocate the Airport perimeter fence along the realigned 30th Street North.
- 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 4 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 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 pursue creation of Rusty Patch Bumble Bee/pollinator habitat on airport property southwest of proposed 30th Street North realignment.

The Preferred Alternative (Alt. B1) that will be included in the Draft EA/EAW is detailed on the attached map.

**Environmental Consequences**

The Draft EA/EAW compares the environmental consequences of the preferred alternative to the No-Action alternative. This includes appropriate analysis of all environmental impact categories required by FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* implementing NEPA, as well as by Minnesota Environmental Quality Board (EQB) rules implementing MEPA. None of the impacts exceed thresholds of significance as defined by FAA Order 1050.1F or MEPA.

The environmental impact categories analyzed include the following:
- Air Quality
- Biological Resources (including fish, wildlife, and plants)
- Climate
- Coastal Resources
- DOT Section 4(f) Lands
- 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
- Water Resources

There is no single impact, even when considered with past or future actions, which represents a substantial impact that cannot be mitigated. As a result, neither permanent adverse nor significant impacts are expected with the implementation of the preferred alternative. All future actions would be subject to avoidance and minimization studies and would undergo agency permitting as required. Every effort will be made to avoid or reduce impacts where feasible. No significant cumulative impacts or cumulative potential effects are associated with the no-action alternative or the preferred alternative.

As part of its commitment to the environment and sustainability, the MAC intends to voluntarily pursue creation of Rusty Patch Bumble Bee/pollinator habitat on airport property southwest of the proposed 30th Street North realignment as a way to demonstrate its ongoing commitment to biological resources.
A summary of the impacts are provided in the attached matrix, which includes the impacts from the no-action and preferred alternatives, as well as any required mitigation techniques or permits.

At the February 6, 2018 PD&E meeting staff will provide a summary of the Draft EA/EAW documentation and seek Committee approval to publish the Draft Lake Elmo Airport EA/EAW document, hold a public comment period from February 26 to April 19, 2018, with a public hearing to occur on April 4, 2018, with the PD&E Committee acting as the Hearing Officers.

COMMITTEE ACTION REQUESTED

RECOMMEND TO THE FULL COMMISSION THAT STAFF BE AUTHORIZED TO PUBLISH THE DRAFT LAKE ELMO AIRPORT EA/EAW WITH A PUBLIC COMMENT PERIOD FROM FEBRUARY 26, 2018 TO APRIL 19, 2018, AND DESIGNATE THE PLANNING, DEVELOPMENT AND ENVIRONMENT COMMITTEE AS HEARING OFFICERS FOR THE ASSOCIATED PUBLIC HEARING TO BE HELD ON APRIL 4, 2018, 6:00 PM IN THE OAK-LAND MIDDLE SCHOOL AUDITORIUM. FURTHER, AUTHORIZE THE EXECUTIVE DIRECTOR/CEO OR HIS DESIGNEE TO EXECUTE THE NECESSARY DOCUMENTS.
1. Relocate Runway 14/32 by shifting 615 feet to the northeast and extend to 3,500 feet, including grading, clearing, and runway lighting.
2. Extinguish existing pressure vessel by 30th Street North, realign 30th Street North around the new Runway 32 Runway Protection Zone (RPZ) to reconnect with the existing South Avenue North intersection, and convey new public road right-of-way to appropriate local municipalities.
3. Realocate the airport perimeter fence along the realigned 30th Street North.
4. Remove the existing north-side taxiway and construct a new cross-field taxiway to serve the new Runway 14 end, including taxiway lighting and signage.
5. Convert existing Runway 14/32 into a partial parallel taxiway and remove the portion of the existing parallel taxiway south of the Runway 4 threshold.
6. Reconstruct Runway 4/22 and extend it 2,750 feet, including necessary lighting and taxiway connectors.
7. Construct other taxiways and engine run-up pads as needed to support the relocated Runway 14/32 and extended Runway 4/22, including a full-length taxiway on the north side of the relocated Runway 14/32 and full taxiway lighting and signage.
8. Relocate the compass calibration pad adjacent to the new partial parallel taxiway (converted Runway 14/32).
9. Establish non-precision GPS-based instrument approach procedures to all runway ends not already excepted.
10. Provide Runway 14/32 lighting systems with the relocated runway.
11. Install medium-intensity runway edge lights (MREL) on Runway 4/22, precision approach path indicators (PAPIs) on the Runway 4, 14, and 22 ends, and runway end identifier lights (REILs) on each end of Runway 4/22.
12. Remove approximately 29 acres of on-airport tree (strategic areas) and individual off-airport trees as necessary to clear trees that penetrate FAA Threshold Lighting Surfaces (TLSS) ahead of Taxiway C approach and transitional surfaces.
13. Install obstruction lighting on fixed-base operator (FBO) and hangar buildings in the TERPS departure surface areas beyond Runway 4, 14, and 22 ends.
14. Construct an on-airport access road connecting the north and west building areas.
15. Creation of Rusty Patch Sigmoid Beakshrike habitat on airport property southwest of proposed 30th Street North realignment.
<table>
<thead>
<tr>
<th>Environmental Impact Category</th>
<th>Impacts: No-Action Alternative</th>
<th>Impacts: Preferred Alternative</th>
<th>Required Permitting/Mitigation &amp; Associated Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Air Quality</strong></td>
<td>None</td>
<td>Minimal impacts during construction</td>
<td>Implement EPA-recommended best management practices (BMPs) and control strategies during construction.</td>
</tr>
</tbody>
</table>
| **Biological Resources**      | None                          | Tree removal                  | • Tree removal to occur during NLEB dormant season (October 1 – April 30).  
• Implement April 2015 USFWS/USDOT NLEB avoidance and minimization measures.  
• Implement MDNR Blanding’s turtle avoidance measures.  
• MAC intends to voluntarily pursue creation of Rusty Patch Bumble Bee/pollinator habitat on airport property southwest of proposed 30th Street North realignment. |
| **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 30th 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, hold educational briefings with pilots and establish Airport Advisory Commission. |
| **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 | • Install light baffles for REILs.  
• Implement low, medium, and high intensity light settings to reduce frequency of light emissions. |
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<tr>
<th>Water Resources</th>
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| Wetlands | None | 2.36 acres direct wetland impact | • Include light blocking in perimeter fencing design and installation.  
• Compensatory Mitigation Plan (assume impact will be banked).  
• USACOE 404 Army Corps permit.  
• Compliance with Minnesota Wetland Conservation Act.  
• MDNR Public Waters permit. |
| Stormwater | None | 12.6 acres increased impervious area | • Stormwater Pollution Prevention Plan.  
• Onsite Best Management Practices.  
• MPCA CWA Section 401 Water Quality Certification and NPDES permit.  
• VBWD permit. |
| Floodplains | None | 0.06-acre wetland fill in floodplain | VBWD permit |

**Cumulative Impacts**

| | No substantial impacts | No substantial impacts | None |
Call to Order
A rescheduled regular meeting of the Planning, Development and Environment Committee, having been duly called, was held Tuesday, February 6, 2018, in Room LT-3048A, Terminal 1-Lindbergh, Minneapolis-St. Paul International Airport. Chair Cramer called the meeting to order at 10:30 a.m. The following were in attendance:

Commissioners: Cramer, Clark Sieben, Fatehi, Ginsberg, Madigan, Monaco, and Chair Boivin


BII A. INTRODUCTIONS – CF 605

A. Wenck Construction

Bridget Rief, Vice President – Planning and Development, stated that in 2016, a continuing consultant selection process for a construction coordinator was conducted, and Wenck Construction Group was one of the firms selected to provide services. Andy Hoffman, Wenck Vice President Preconstruction Services, provided background information regarding the firm and noted the various MAC projects they are working on. Shane Butler, Senior Project Manager, and Mark Fisher, Preconstruction Manager, were also introduced and reviewed their roles and responsibilities.
7. 2018 Mezzanine HVAC/AHU Replacement and Penthouse (North)

CHAIR BOIVIN MOVED AND COMMISSIONER CLARK SIEBEN SECONDED TO RECOMMEND TO THE FULL COMMISSION ACCEPTANCE OF THE LOWEST RESPONSIBLE BID FROM KNUTSON CONSTRUCTION SERVICES, INC., IN THE AMOUNT OF $13,757,842. FURTHER, AUTHORIZE THE EXECUTIVE DIRECTOR/CEO OR HIS DESIGNEE TO EXECUTE THE NECESSARY DOCUMENTS AND ESTABLISH A PROJECT BUDGET OF $14,700,000. THE MOTION CARRIED BY UNANIMOUS VOTE.

BV A. CAPITAL IMPROVEMENT PROGRAM AMENDMENT – CF 609

1. Runway 4-22 In-Pavement Guard Lights

Bridget Rief, Vice President – Planning and Development, provided background information on this item noting the original scope of the project included in-pavement guard lights at three locations on Runway 4-22: one on each side of Runway 12R-30L, and one for the southwest side of Runway 12L-30R. In a recent meeting with the Federal Aviation Administration (FAA), a request was made to include a fourth location on Runway 4-22 at the holding position for the northeast side of Runway 17-35. In addition, the FAA has requested that MAC install air traffic control tower switches for the system and install outboard above ground guard lights at each of the locations. Lastly, the FAA has asked MAC to speed up the project and complete installation in 2018.

Based on the significantly increased scope of the project, the revised CIP amount needed in 2018 is $800,000. This project will be funded with a combination of anticipated Federal aid (Entitlement funds) and Passenger Facility Charges (PFCs).

Staff is requesting the authority to move the 2019 project dollars into 2018 and increase the amount from $500,000 to $800,000.

COMMISSIONER MONACO MOVED AND COMMISSIONER CLARK SIEBEN SECONDED TO RECOMMEND TO THE FULL COMMISSION THAT THE 2018 CIP BE AMENDED TO INCLUDE $800,000 FOR THE RUNWAY 4-22 IN-PAVEMENT GUARD LIGHTS PROJECT AS OUTLINED IN THE COMMITTEE MEMORANDUM AND AUTHORIZE THE EXECUTIVE DIRECTOR/CEO OR HIS DESIGNEE TO EXECUTE THE NECESSARY DOCUMENTS. THE MOTION CARRIED BY UNANIMOUS VOTE.

BV B. LAKE ELMO AIRPORT ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL ASSESSMENT WORKSHEET – REQUEST TO PUBLISH DRAFT DOCUMENT FOR PUBLIC COMMENT AND APPOINT PLANNING, DEVELOPMENT AND ENVIRONMENT COMMITTEE AS HEARING OFFICERS – CF 610

In February 2017, the federal and state environmental review processes were initiated for the Lake Elmo Airport enhancements detailed in the Lake Elmo Airport 2035 Long-Term Comprehensive Plan. Chad Leqve, Director – Environment, provided background information on the environmental review process including the Stakeholder Engagement Plan, the purpose and need for the project, the alternatives that were carried forward for full environmental review, and the results of the environmental impact categories that were analyzed.

Mr. Leqve also reviewed the proposed timeline which anticipates completion of the environmental process by June. He thanked Commissioner Madigan, Evan Barrett and Colleen Bosold from Mead and Hunt, and several MAC staff for their efforts throughout the process.
Commissioner Madigan echoed Mr. Leqve’s comments and acknowledged the work of the Community Engagement Panel. He also thanked staff for their work in engendering trust and a true willingness to respond to community concerns. Commissioner Madigan also thanked the Lake Elmo pilot community for their participation throughout the process. Commissioner Madigan stated he endorses the committee action being requested.

**CHAIR BOIVIN MOVED AND COMMISSIONER MONACO SECONDED TO RECOMMEND TO THE FULL COMMISSION THAT STAFF BE AUTHORIZED TO PUBLISH THE DRAFT LAKE ELMO AIRPORT EA/EAW WITH A PUBLIC COMMENT PERIOD FROM FEBRUARY 26, 2018 TO APRIL 19, 2018, AND DESIGNATE THE PLANNING, DEVELOPMENT AND ENVIRONMENT COMMITTEE AS HEARING OFFICERS FOR THE ASSOCIATED PUBLIC HEARING TO BE HELD ON APRIL 4, 2018, 6:00 PM IN THE OAK-LAND MIDDLE SCHOOL AUDITORIUM. FURTHER AUTHORIZE THE EXECUTIVE DIRECTOR/CEO OR HIS DESIGNEE TO EXECUTE THE NECESSARY DOCUMENTS. THE MOTION CARRIED BY UNANIMOUS VOTE.**

**BVI A. MNDOT STATE AVIATION SYSTEM PLAN PRESENTATION – CF 611**

Mr. Rylan Juran, Aviation Planner, from the Minnesota Department of Transportation Office of Aeronautics, provided an overview of the Minnesota State Aviation System Plan (SASP) which is currently being updated. The SASP is a 20-year plan for the state’s system of airports that sets goals, identifies needs and creates a vision for the future. Mr. Juran reviewed the scope of the project for phase 1, the public involvement plan, the advisory group structure, the schedule for completion of Phase 1, and results of the SASP outreach survey.

Commissioner Clark Sieben thanked Mr. Juran for his presentation. She noted that with regards to reaching out to the corporate community, the Metropolitan Airports Commission (MAC) is engaged with Greater MSP in a regional air service partnership, and through that partnership, recently surveyed numerous corporations about the twin cities area. She asked if there is a way for the State, MAC, and Greater MSP to work together to ensure the same questions are not being asked of corporations and creating redundant work.

Bridget Rief, Vice President – Planning and Development, reported that Neil Ralston, Airport Planner, is participating on the Technical Advisory Committee and she is participating on the SASP Advisory Committee.

Mr. Juran responded to questions regarding classification of airports and the number of airports in Minnesota. Commissioner Monaco asked if there is criteria that will be used to determine the number of airports the State should have. Mr. Juran responded that is an issue that has been explored and heard from time to time. MnDOT has had discussions with airports regarding what their futures may look like.

Commissioner Madigan thanked Mr. Juran for his presentation and noted the statutory obligations of the MAC to promote aviation. He asked what activities MnDOT uses to promote aviation and whether there are opportunities for greater collaboration between MAC and the Department of Aeronautics. Mr. Juran stated they are open to any new ideas that may come forward.
Item B –
Notice of Public Comment Period and Public Hearing
for Draft Lake Elmo Airport EA/EAW
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, 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
METROPOLITAN AIRPORTS COMMISSION
NOTICE OF DRAFT EA/EAW AVAILABILITY & PUBLIC HEARING LAKE ELMO AIRPORT ENVIRONMENTAL ASSESSMENT/ENVIRONMENTAL ASSESSMENT
WORKSHEET FOR PROPOSED AIRFIELD IMPROVEMENTS

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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, 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
Stillwater Gazette
March 2, 2018
788027

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County of Washington

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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 7TH 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:

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*abcdefghijklmnopqrstuvwxyz
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Subscribed and sworn to before me on this 7TH day of MARCH, 2018.

TONYA P. WHITEHEAD
Notary Public

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01/18
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 - (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](#)

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**In this publication:**

- EQB Announcements  
- Petitions  
- Environmental Impact Statement Need Decisions  
- Environmental Assessment Worksheets  
- Environmental Assessment Worksheet Joint State and Federal EA/EAW  
- Notices

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**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](http://www.eqb.state.mn.us).

You can manage your subscription to the [EQB Monitor here](#). Be sure to add MNEQB@public.govdelivery.com to your address book or safe sender list.

Check the [EQB Calendar](http://www.eqb.state.mn.us) for more details on Monitor deadlines and Board Meetings. Meeting minutes, agendas and additional notices are also posted on the [EQB Website](http://www.eqb.state.mn.us). You can also find us on [Twitter](http://twitter.com) and [Facebook](http://facebook.com).

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**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.

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](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

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Lake Elmo Airport EA/EAW Comments

c/o MAC Environment Department

6040 28th Avenue South

Minneapolis, MN 55450

**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
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(Cite 42 SR 1097)  Minnesota State Register, Monday 19 March 2018  Page 1097
Official Notices

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
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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:

Item C –
Draft Lake Elmo Airport EA/EAW Public Hearing
Attendance Sheets
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<td>Paul Have</td>
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<td>12 W SANDRALEE Dr</td>
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<td>St Paul</td>
<td>25 Flandreau Pl 55106</td>
<td>Lake Elmo Airport Pilots</td>
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Wednesday April 4, 2018 Public Hearing
Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet
Oak-Land Middle School Auditorium
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<td>Devrel Gilbey</td>
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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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<td>2654 Neal Ave N</td>
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<td>Roger Westberg</td>
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<td>Ed Bankhouse</td>
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<td>Foundation for Housing Assn.</td>
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<td>Molly Kosson</td>
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Oak-Land Middle School Auditorium

OPPOSED
## MEETING ATTENDANCE SHEET

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<td>Troy Wence</td>
<td>Woodbury</td>
<td>391 Crestmoor Pl.</td>
<td>210 Pilots</td>
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<td>West Lakeland</td>
<td></td>
<td>Resident opposed</td>
</tr>
<tr>
<td>Laura Kaschmitter</td>
<td>West Lakeland</td>
<td></td>
<td>Residents opposed</td>
</tr>
<tr>
<td>Mick Kaschmitter</td>
<td>&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ken Peitz</td>
<td>West Lakeland</td>
<td></td>
<td>Resident opposed</td>
</tr>
<tr>
<td>Anne Schwartz</td>
<td>West Lakeland</td>
<td></td>
<td>Resident opposed</td>
</tr>
<tr>
<td>Bob Schwartz</td>
<td>West Lakeland</td>
<td></td>
<td>Resident opposed</td>
</tr>
<tr>
<td>Scott Hanson</td>
<td>Woodbury</td>
<td></td>
<td>210 Pilots</td>
</tr>
<tr>
<td>John Gozum</td>
<td>W. Lakeland</td>
<td></td>
<td>210 Pilots</td>
</tr>
<tr>
<td>Ron Friedkove</td>
<td>Baytown</td>
<td>4220 Osgood Ave. No</td>
<td>Baytown</td>
</tr>
</tbody>
</table>

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Wednesday April 4, 2018 Public Hearing
Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet
Oak-Land Middle School Auditorium
## MEETING ATTENDANCE SHEET

By filling this in, you acknowledge that this is public information and may be included in a public document.

<table>
<thead>
<tr>
<th>NAME</th>
<th>CITY</th>
<th>ADDRESS (OPTIONAL)</th>
<th>REPRESENTING</th>
</tr>
</thead>
<tbody>
<tr>
<td>John J. Regenoc</td>
<td>St. Paul</td>
<td>545 W. Ryan Ave, Roseville, MN</td>
<td>Airport User, Airport Owner, EAA Member</td>
</tr>
<tr>
<td>Keith Begeman</td>
<td>Lake Elmo</td>
<td>5833 Lake Elmo Ave, 55113</td>
<td>City of Lake Elmo</td>
</tr>
<tr>
<td>Rod Ongstad</td>
<td>Woodbury</td>
<td>212 W. Woodbury, MN 55129</td>
<td></td>
</tr>
<tr>
<td>John Carmen</td>
<td>Maple Grove</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mike Groosky</td>
<td>Lake Elmo</td>
<td>R.0. Box 44, Lake Elmo, MN 55012</td>
<td></td>
</tr>
<tr>
<td>Gregg Adler</td>
<td>At Home</td>
<td>752 Indian Tr, 55001</td>
<td></td>
</tr>
</tbody>
</table>

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Wednesday April 4, 2018 Public Hearing  
Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet  
Oak-Land Middle School Auditorium
<table>
<thead>
<tr>
<th>NAME</th>
<th>CITY</th>
<th>ADDRESS (OPTIONAL)</th>
<th>REPRESENTING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pat Kasper</td>
<td>Lakeland</td>
<td></td>
<td>my self</td>
</tr>
<tr>
<td>Bob Krezsch</td>
<td>New Richmond</td>
<td>245 S. Knolles</td>
<td>New Richmond</td>
</tr>
<tr>
<td>Ron Olm</td>
<td></td>
<td></td>
<td>New Richmond</td>
</tr>
</tbody>
</table>

### Notes

Wednesday April 4, 2018 Public Hearing
Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet
Oak-Land Middle School Auditorium
Item D –
Draft Lake Elmo Airport EA/EAW Public Presentation
Slides
Overview

• Environmental review process
• Stakeholder engagement process
• Draft EA/EAW document – key components
• Public comments
Environmental Review Process

• Federal and state environmental review is required before the project can be funded and implemented

• Federal environmental review
  • The Federal Aviation Administration (FAA) is the responsible agency under the National Environmental Policy Act (NEPA)
  • The FAA determined that an Environmental Assessment (EA) is the appropriate federal review document for this project

• State environmental review
  • The Metropolitan Airports Commission (MAC) is the responsible government unit under the Minnesota Environmental Policy Act (MEPA)
  • Minnesota Rules 4410.4300 prescribes completion of an Environmental Assessment Worksheet (EAW) for this project
  • Minnesota Rules 4410.1300/4410.3900 states that a federal EA can fulfill the informational requirements of a state EAW
Stakeholder Engagement Plan

• The MAC formulated a project-specific stakeholder engagement plan to achieve the following objectives:
  • Strengthen 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 – Outreach Platforms

- Three public events held at key milestones in the EA/EAW process
  - May 11, 2017: Introduction to the Environmental Review Process
  - August 17, 2017: Purpose & Need and Alternatives
  - November 6, 2017: Environmental Effects

- Periodic project newsletters and process updates
- Project website
- E-news subscription list
- Public notifications
Community Engagement Panel (CEP)

- Serves several important functions including:
  - Representing a broad range of stakeholder groups
  - Receiving information about the EA/EAW and sharing it with constituencies
  - Providing input to the EA/EAW as the voice of key stakeholders
  - Providing technical advice to the consultant team
- Five CEP meetings held during development of the draft EA/EAW
Stakeholder Input & Concerns

Carefully Considered During EA/EAW Development

- **Concern:** The plan is outdated.
  - Made several adjustments during the LTCP process to reflect current needs and stakeholder concerns.

- **Concern:** Estimates of existing aircraft activity levels are inaccurate.
  - Re-evaluated LTCP operations forecast for EA/EAW using latest and most comprehensive available activity data.

- **Concern:** The project is not needed.
  - Re-evaluated LTCP runway length analysis for EA/EAW.
  - Graphically depicted the runway length evaluation for easier understanding.

- **Concern:** The airport and this project do not benefit the surrounding community.
  - Airport contributes to the local and regional economy in several ways.
  - Airport tenants participate in community-focused activities.
  - More information provided in response to FAQ on project website.

- **Concern:** Realignment of 30th Street N will disrupt emergency response times and pose safety concerns to travelers.
  - Studied additional alignment alternatives and safety enhancements (paved shoulders, guardrails, snowdrift management, etc.)
  - Met with local emergency response experts to better understand effects of alternatives.

- **Concern:** The project costs too much, is fiscally irresponsible, and will increase local taxes.
  - Project will be self-funded by aviation users through state and federal programs, as well as MAC funds.
  - No local sales or property taxes will be used.
Stakeholder Input & Concerns
Carefully Considered During EA/EAW Development

- **Concern:** Additional air traffic and associated noise levels will negatively affect airport neighbors.
  - Re-evaluated LTCP operations forecast for EA/EAW and confirmed air traffic increase will be minimal.
  - Studied a displaced threshold alternative in EA/EAW.
  - Conducted new noise analysis with latest FAA software.
  - Met one-on-one with several airport neighbors to discuss noise issues.
  - Provided pilot briefing on noise abatement procedures.
  - Installed noise abatement signs on airfield.
  - MAC will establish an airport advisory committee and update the airports' voluntary noise abatement plan in collaboration with the committee.

- **Concern:** The project will negatively affect property values and quality of life.
  - Aircraft flight patterns will not change significantly.
  - Airport’s role will not change.
  - Project will not result in significant air traffic increases.
  - More information provided in response to FAQ on project website.

- **Concern:** Environmental impacts to wetlands, wildlife habitats, and trees will be unacceptable.
  - Analyzed impacts to these resources extensively in EA/EAW.
  - MAC is considering establishment of tall-grass prairie habitat in area south of the new runway.
Stakeholder Input & Concerns Carefully Considered During EA/EAW Development

• **Concern:** FAA could consider waiver of runway protection zone requirements.
  - Studied alternatives with roads and/or railroads in the RPZ.
  - Confirmed with FAA that they will require clear RPZ.

• **Concern:** Future airport safety zoning will negatively affect airport neighbors.
  - Studied model state safety zones in EA/EAW.
  - MAC will convene a Joint Airport Zoning Board (JAZB).
  - JAZB will consider further public input prior to adoption of an ordinance.

• **Concern:** Proposed airfield lighting will negatively affect motorists and airport neighbors.
  - Several potential mitigation measures identified in EA/EAW.

• **Concern:** Public engagement has been inadequate.
  - Established project-specific stakeholder engagement plan to ensure effective communication and information-sharing.
  - Convened community engagement panel and held several public events.
  - Met one-on-one with several airport neighbors.
  - Revised public information materials/messages based on questions/concerns.
  - Changed CEP meeting format to include public comment.
  - Hired public meeting facilitator.
  - More information available on the project website.
Draft EA/EAW – Key Components

• Purpose & Need
• Alternatives Analysis
• Environmental Effects
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 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 users
4) Upgrade the instrument approach procedures
Range of Alternatives Considered

- Five categories of alternative concepts are considered by the EA/EAW:
  - No-Action Alternative
  - Primary Runway 14/32 Alternatives
  - 30th Street North Realignment Alternatives
  - Crosswind Runway 04/22 Alternatives
  - Instrument Approach Alternatives
Primary Runway 14/32 Alternatives Evaluation Process

A. Criteria for Identifying Range of Alternatives
   - Avoid or minimize changes to airport use and aircraft flight patterns
   - Maintain runway orientations
   - Avoid or minimize land acquisition

B. Criteria for Screening Range of Alternatives
   - Compatible with a viable 30th Street N. realignment alternative
   - Meet the Purpose and Need
   - Conform to FAA policies

C. Criteria for Identifying Preferred Alternative
   - Practicability factors
   - Environmental factors

D. Preferred Alternative

No Action Alternative

For Evaluation Purposes Only
Proposed Development
"Preferred Alternative"

LEGEND
- Existing Property
- Municipal Boundary
- Existing Runway Protection Zone
- Proposed Runway Protection Zone
- 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
- Potential Wetland Habitat

Note: 60 DNL shown for informational purposes only.
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
## Summary of Environmental Effects

<table>
<thead>
<tr>
<th>Environmental Analysis Category</th>
<th>Effects: Baseline Alternative (No Expansion Alternative)</th>
<th>Effects: Preferred Alternative</th>
<th>Required Permitting, Mitigation, and/or Associated Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>None</td>
<td>Minimal impacts during construction</td>
<td>Implement EPA-recommended best management practices (BMPs) and control strategies during construction</td>
</tr>
</tbody>
</table>
| **Biological Resources** (including fish, wildlife, and plants) | None                                                   | Tree removal                       | - Tree removal to occur during NLEB dormant season (October 1 – April 30)  
- Implement April 2015 USFWS/USDOT NLEB avoidance and minimization measures  
- Implement MnDNR Blanding’s turtle avoidance measures |
| ![Northern Long-eared Bat (NLEB)](image) ![Blanding's Turtle](image) | ![Northern Long-eared Bat (NLEB)](image) ![Blanding's Turtle](image) | ![Northern Long-eared Bat (NLEB)](image) ![Blanding's Turtle](image) | ![Northern Long-eared Bat (NLEB)](image) ![Blanding's Turtle](image) |
| Climate                        | None                                                   | None                             | None                                                     |
| Coastal Resources              | N/A                                                    | N/A                              | None                                                     |
| DOT Section 4(f) Lands         | N/A                                                    | N/A                              | None                                                     |
| Farmlands                      | None                                                   | 42.28 acres directly converted   | None                                                     |
| Hazardous Materials, Solid Waste, and Pollution Prevention | None                                                   | None                             | Dispose of construction materials and other solid waste in accordance with state and local laws |
## Summary of Environmental Effects

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<thead>
<tr>
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<th>Required Permitting, Mitigation, and/or Associated Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Historic, Architectural, Archaeological, and Cultural Resources</td>
<td>None</td>
<td>None</td>
<td>Hand-cut trees near archeological building foundations</td>
</tr>
<tr>
<td>Land Use</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Residential</td>
<td>Potential Zoning Conflicts</td>
<td>Potential Zoning Conflicts</td>
<td>Convene Joint Airport Zoning Board (JAZB) to develop an Airport Zoning ordinance</td>
</tr>
<tr>
<td>Ground Transportation</td>
<td>RPZ Conflicts</td>
<td>Increased travel time on 30th Street</td>
<td>None</td>
</tr>
<tr>
<td>Wildlife Attractants</td>
<td>Wetlands near runway approach</td>
<td>Wetlands near runway approach</td>
<td>Use FAA-approved seed mixes in turf grass areas</td>
</tr>
<tr>
<td>Natural Resources and Energy Supply</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
</tbody>
</table>
| Noise and Compatible Land Use | None | None | Establish airport advisory commission
- Update voluntary noise abatement plan and hold educational briefings with pilots |
| Socioeconomics, Environmental Justice, and Children's Health & Safety | None | None | None |
## Summary of Environmental Effects

<table>
<thead>
<tr>
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<th>Effects: Preferred Alternative</th>
<th>Required Permitting, Mitigation, and/or Associated Actions</th>
</tr>
</thead>
</table>
| Visual Effects (including airfield lighting) | None | New airfield light system | - Install light baffles for RELIs  
- Install solid fencing in runway approaches  
- Implement low, medium, and high intensity light settings to reduce frequency of light emissions |
| **Water Resources** | | | |
| Wetlands | None | 2.36 acres direct wetland impact | - Compensatory Mitigation Plan (assume impact will be banked)  
- USACOE 404 Army Corps Permit  
- Compliance with Minnesota Wetland Conservation Act  
- MnDNR Public Waters permit |
| Stormwater | None | 12.6 acres increased impervious area | - Stormwater Pollution Prevention Plan  
- On-Site Best Management Practices  
- MPCA CWA Section 401 Water Quality Certification and NPDES permit  
- VBWD permit |
| Floodplains | None | 0.06-acre wetland fill in floodplain | VBWD Permit |
| Cumulative Impacts | No substantial impacts | No substantial impacts | None |
Public Comments

• Spoken comments will be recorded at the public hearing tonight.
• Written comments will be accepted until April 19, 2018.
• 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 Comments

• If you wish to speak:
  • Please complete a speaker sign-up card and provide to a staff member.
  • The hearing officer will call your name when it is your turn.
  • Please limit your comments to five minutes or less.

• Written comments will be accepted until April 19, 2018, and can be submitted:
  • In-person tonight
  • Via electronic mail to: Chad.leqve@mspmac.org.
  • Via postal mail to:
    Chad Leqve, Director of Environment
    Metropolitan Airports Commission
    6040 28th Ave S
    Minneapolis, MN 55450
Item E –
Draft Lake Elmo Airport EA/EAW Public Hearing Transcript
METROPOLITAN AIRPORTS COMMISSION

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

REPORTED BY:

Elizabeth J. Gangl

Registered Professional Reporter
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
METROPOLITAN AIRPORTS COMMISSION STAFF PRESENT (Cont'd):

Neil Ralston, Airport Planner

Bridget Rief, Vice President - Planning and Development

Brian Ryks, Executive Director/Chief Executive Officer

Atif Saeed, Vice President - Finance and Revenue Development

Gary Schmidt, Director - Reliever Airports

Evan Wilson, Senior Attorney
CHAIR CRAMER: Good evening, everyone. We join the others in welcoming you here today and thank you for taking your time out on a somewhat still snowy evening to be here with us. I've got a little bit of a preamble to work through here and we can do that so we can put it into the record.

The April 4th, 2018 public hearing will now come to order. My name is Steve Cramer, and I am the Chair of the Planning, Development & Environment Committee of the Metropolitan Airports Commission. This Committee has been appointed as Hearing Officers for tonight's public hearing. With me this evening is the Chair of the Metropolitan Airports Commission, Dan Boivin, and MAC Commissioners. Why don't we just go down the row here and have each Commissioner introduce themselves, if they would, starting with Commissioner Madigan.

COMMISSIONER MADIGAN: Mike Madigan, District F.


COMMISSIONER MONACO: Don Monaco from Duluth.

COMMISSIONER KING: Rick King from Eden Prairie.

CHAIR CRAMER: Special thanks to
Commissioner Madigan. I know you spent a lot of time on this issue.

I welcome you all to tonight's public hearing. The purpose of this hearing is to provide the general public with an opportunity to comment on the Lake Elmo Airport Improvements Draft Environmental Assessment and Environmental Assessment Worksheet issued for public review. The Draft EA/EAW availability and a notice of this public hearing was posted on the MAC website, distributed through a GovDelivery subscription list, published in the Environmental Quality Board Monitor, the Minnesota State Register, the Pioneer Press, the Stillwater Gazette and the Oakdale/Lake Elmo Review. All announcements directed readers to the project website where the Draft EA/EAW could be reviewed.

Prior to this meeting a public open house was held at 6:00 p.m. and a presentation was provided at 6:30 p.m. Additionally, as part of this process, the MAC developed and executed a formal stakeholder engagement plan in collaboration with community and airport user stakeholders. In addition to a comprehensive project website, this effort included newsletters, an E-news subscription list, public notifications, formation of the Community Engagement Panel and public events held at key milestones in the process. The last of the three
community events was held on November 6th, 2017 at the Oak-Land Middle School auditorium, focusing on the environmental effects of the proposed improvements.

The EA/EAW is being completed in order to initiate proposed airfield improvements identified in the 2035 Lake Elmo Airport Long Term Comprehensive Plan, which was completed in 2016. The EA is required to comply with the federal National Environmental Policy Act and an EAW is required to comply with the Minnesota Environmental Policy Act. The Federal Aviation Administration is the lead federal agency responsible to the EA and the MAC is the responsible governmental unit for the state EAW review process; therefore, this hearing is being sponsored jointly by the FAA and the MAC. Upon completion of the EA/EAW process and the environmental determinations, the proposed improvements will be scheduled accordingly in the MAC's Capital Improvement Program process.

Tonight your testimony on the information contained in the Draft EA/EAW will be recorded by a court reporter. If you would like to submit comments but do not care to speak this evening you may do so in writing. Comment forms are available at the welcome desk. Completed forms may be submitted this evening or via email to Chad Leqve, Director of Environment,
Metropolitan Airports Commission, 6040-28th Avenue South, Minneapolis, Minnesota 55450, or by email to Chad Leqve, chad.leqve@mspmac.org.

Regardless of how comments are submitted, they must be submitted by the close of the comment period, which is 5:00 p.m. on April 19.

A speaker signup card must be completed in order to present oral comment at this hearing. Some of you may have already completed a speaker signup card at the welcome desk outside of the auditorium. If you would like to present oral comments but have not signed up, please raise your hand and a signup card will be delivered to you at your seat. You can do that during the course of the hearing if you would like. I will call upon the speakers who have signed up one by one to present their comments.

I respectfully request that you limit your statement to five minutes, and Mr. Leqve will be a timekeeper and give everyone a one-minute warning if you come up on the five-minute time frame. Although I don't want to restrict anyone's ability to present their comments, that will ensure that everyone wishing to speak has an opportunity to do so this evening. If you have additional comments following the five minutes, we request that you submit those comments in writing.
We will not be answering questions tonight and will not be taking any actions nor making any recommendations. All of the verbal and written comments will be taken into consideration before taking final action on the Draft EA/EAW at a future date.

Thanks for your cooperation. I will now open the hearing for public comment. I would first like to invite any public officials who wish to speak on the record to present their comments before we begin with the speaker signup cards.

I know there are two public officials that are present. Let me just see if, first, Dave Schultz from the West Lakeland Township Board would like to address the Commission?

MR. SCHULTZ: I'll pass.

CHAIR CRAMER: Pass. Okay. How about Ron Fredkove from the Baytown Township Board?

MR. FREDKOVE: Pass.

CHAIR CRAMER: Okay. Thank you, gentlemen, for being here and for your public service.

So let me go to the cards, and the microphone is right here in front. The first card is from Brad Cornell. Mr. Cornell, welcome.

MR. CORNELL: Good evening. First off, 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 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.

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.
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;
that your comprehensive plan is not aligned with our
township but you're proposing and pushing forward.

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 appears not to be very compatible with our township or the neighbors.

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. So that's my comments. I'll add further in writing.

CHAIR CRAMER: Thank you. Hold on just one second, Mr. Cornell.

Do you need any more information, Court Reporter?

COURT REPORTER: I would like people to say their name first and then spell the last name.

CHAIR CRAMER: Oh, I'm sorry, my fault.

MR. CORNELL: My name is Brad Cornell, C-O-R-N-E-L-L.

CHAIR CRAMER: Thank you, Mr. Cornell.

Next speaker is Mr. Krack. Mr. Krack.
MR. KRACK: I would like to yield the floor to the next person. I would like to hear what other people have to say and I may have some comments at the end.

CHAIR CRAMER: We'll come back to you. Thank you. Joel Surgenor? Joel?

MS. SURGENOR: Jnel.

CHAIR CRAMER: Jnel. The light's a little shaky up here, I apologize.


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 and there's no guarantee that you guys aren't going to increase your airplanes. You say not but, again, there's no guarantee. So that potential, you guys aren't going to -- the MAC is not going to give me new windows; we just built there less than a year ago. So those are my concerns. And then the removal of the land to expand the runway.

CHAIR CRAMER: Thank you very much.
Next card is from Anne Bucheck. Ms. Bucheck.

MS. BUCHECK: Hi. My name is Ann Bucheck, B-U-C-H-E-C-K, A-N-N.

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."

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. If not all airport operations are being used fully, then how can you possibly provide the most 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.

I would encourage you to use the Holman Field. I read the EAW and was pleased to learn about the Schmidt Brewing Company and agree that the airport may need new pavement and a connector road; however, 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?

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 airport. I would like to know how were these described times determined?

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. 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.

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 ponding, will there also be possible causes for crashes? Loss of life?

CHAIR CRAMER: Ms. Bucheck, we're about at the one-minute mark. Will you wrap it up? Thank you.

MS. BUCHECK: Okay. We all remember American Airlines' Captain Sully who had to land on the Hudson River. 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.

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. You may even wish to collaborate with the New Richmond Wisconsin Airport.

Thank you.

CHAIR CRAMER: Thank you. We welcome those detailed remarks if you would like to submit them.

(Applause.)

CHAIR CRAMER: The next person is Fred Brandt. Mr. Brandt?

MR. BRANDT: It's B-R-A-N-D-T. In the
interests of efficiency, I would like to read my comments. 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 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.

CHAIR CRAMER: Thank you, sir. If the last two speakers would be willing to submit their written comments to the court reporter? That would be helpful in creating a full record if you're willing to do that.

Okay. The next card is from Troy Wenck.

MR. WENCK: Thank you. My name is Troy Wenck, W-E-N-C-K. 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.

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 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.

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. 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.

    Thank you for your work.

    CHAIR CRAMER: Thank you for your comments.

    The next speaker card is from Barry Rosell.

    MR. ROSELL: Hi. My name is Barry Rosell, R-O-S-E-L-L, and 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 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."

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 -- excuse the phrase -- but down our throats 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.

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.

So I also take issue with the comments over "every three years," or however often we've come down here and to listen to this. 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."

So I guess I'll end with this. 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. But if you can force this airport on us, why the heck can't you force pilots and the airport and some type of management system of the noise that is going to come. And I will -- I guess I'll end with that. Thank you.

CHAIR CRAMER: Thank you for your comments. Next speaker card is from John Renwick. Mr. Renwick.

MR. RENWICK: John Renwick. John with an H, R-E-N-W-I-C-K. I'm in support of the plan. I'm an airport user.

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.

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. Thank you.

CHAIR CRAMER: Thank you, sir.

The next card is Mike Graczyk. I'm sorry, I may have mispronounced that name.

MR. GRAYSON: It's Mike Graczyk, and I would like to come back for more comment.

CHAIR CRAMER: Okay. Mr. Krack, you're up unless there have been some other cards submitted? Oh, got a few. Mr. Krack, do you want to go now or --

MR. KRACK: I'll wait.

CHAIR CRAMER: While we're waiting for the cards, I neglected to introduce our attorney, Evan Wilson, who is here to keep us on the straight and narrow, so I thank you for being here.

Mark Wendorf.

MR. WENDORF: Good evening. Mark Wendorf,
W-E-N-D-O-R F. I'm from Baytown Township. I'm just off the runway going to the north of the airport and I've got a few comments here.

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. 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, and 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.

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. And as to the Holman Field, as somebody mentioned, it's dramatically underused right now as the other MAC airports are as well.
But my question is not about the -- or my comment is not about the total lack of need for this boondoggle, my question is this: 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. The extended runways -- and 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. Excuse me.

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. 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.

My point is this, so the question is this: As the MAC reps know here, of course, Section 13 of the Minnesota Constitution requires that before you take any action you must make sure that you can provide -- "that 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?

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.

With that, thank you.

CHAIR CRAMER: Thank you, sir, for your comment.

Next speaker card is from Rob Creibich. Probably got that name wrong. Sorry, Rob.

MR. CREIBICH: Close enough. My name is Rob Creibich, C-R-E-I-B-I-C-H, and I'm probably the only one speaking tonight from the other side of the river, from New Richmond, Wisconsin, so I've heard our community mentioned here. And 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.

We've got the second-busiest general aviation airport in Wisconsin, and 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. For the Super Bowl we had 40 corporate aircraft that landed at the New Richmond Airport, including Terry Bradshaw, Sheryl Crow and Jimmy Fallon. We routinely get the governor of the state to land there.

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.

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, and I've attended previous hearings, and to do the right thing for federal taxpayers, and that is to reallocate these dollars to New Richmond and not duplicate the service there.

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.

We had 20 top state officials in New Richmond just several weeks ago. We're looking to do a pilot training facility there given the looming shortage of pilots. We just -- we hate to butt into other people's business but, again, this is federal tax dollars so we think we have a right to vie for those dollars.

Thank you very much.

CHAIR CRAMER: You're welcome. Thank you.
(Applause.)

CHAIR CRAMER: Okay. The next card is from Molly Olson. Ms. Olson?

(Applause.)

MS. OLSON: My name is Molly, M-O-L-L-Y, Olson, O-L-S-O-N. I live in West Lakeland Township. 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, 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. We all know and have heard tonight that the plan was created in 1965 when the community looked extremely different. 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.

The other thing I hope FAA is reading this document, and this testimony, too, because 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.

And again, the noise. Of course -- thank you
everybody who has spoken tonight about the noise -- of course there will be excess noise.

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.

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 from that group that trust their government to do the right thing or have given up, one of the two.

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? 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. It's small hobby farms -- planes, excuse me -- small hobby planes, and we're spending, what was it, $14 million to help satisfy the hobby for a lot of people?

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?

CHAIR CRAMER: Ms. Olson, the one-minute mark if you could wrap it up.

MS. OLSON: I'll wrap it up and just say it is incomprehensible that this volume of dollars would be spent for a project that is so unnecessary. 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.

CHAIR CRAMER: Thank you.

(Applause.)

CHAIR CRAMER: Next card is from Patrick Fleming. Mr. Fleming?

MR. FLEMING: My name is Patrick Fleming,

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, which are little cumbersome.

I appreciate your work on this and I look forward to a 3,500-foot runway. Thank you.

CHAIR COMMENTS: Thank you for your comments. I think we have a few more cards before we have Mr. Krack and Mr. Graczyk arm wrestle for who goes last.

MR. KRACK: Mr. Graczyk can go first.

CHAIR CRAMER: Susan Dunn. Susan Dunn?

Mark Montanari?

MS. DUNN: She's getting me the microphone.

CHAIR CRAMER: Sorry, I apologize. We'll go back to Ms. Dunn.

STAFF: Do we have a cordless mic? No?

CHAIR CRAMER: Do you have some written
comments you can submit?

MS. DUNN: I do. I think I'll go ahead and write them. But I do have to say that 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.

CHAIR CRAMER: Okay.

MS. DUNN: 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.

CHAIR CRAMER: Okay. You certainly have some time to write your comments down and get them into the record, so thank you very much. I'm sorry we couldn't accommodate you with the setup tonight.

All right. Now Mr. Montanari.

MR. MONTANARI: Mark Montanari, M-O-N-T-A-N-A-R-I. 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. That's all I've got to say.

CHAIR CRAMER: Thank you, sir. Any other cards? All right. Mike Seeber.

MR. SEEBER: That's me, S-E-E-B -E-R. I live on Neal Avenue, and I have been to a number of these meetings. I'm opposed to the project. A couple of you probably know me or maybe you don't recognize me.
We have spoken against the project. It seems unnecessary. 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. There's -- you don't give me, I'll speak for myself, the impression of a trustworthy partner in this process. You give me the impression of a bully that just wants to have your way. You go through a process -- this is my feelings on it, I'll speak for myself again. 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. And I think what this all boils down to, I'll have to be honest, I don't care a lot for the MAC. I don't mind the airport being here and I'd be fine with repaving the runway as it is, keep it existing, but 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 every 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, and I think the very bottom -- and I came in a little bit late,
so forgive me if somebody else has said this. 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. And the gentleman from Wisconsin, the airport manager or -- I don't know what his title is.

MR. CREIBICH: Chamber.

MR. SEEBER: Chamber, thank you. I appreciated your comments.

-- said that 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. So there should be -- the prospect or the process, it just does not seem fair.

And at a number of points along the way the information that we've been given has not been correct, and some have testified that they have confidence in what you've done. I've been here. I haven't seen Mr. Wenck
here before. Maybe he's been here before, maybe he hasn't. He has confidence. I don't. I've not been satisfied in any way. These meetings are show and it feels like you folks just want to have your way. So that's, that's my testimony.

CHAIR CRAMER: Okay. Great. Thank you, sir.

MR. SEEBER: Yep. Thank you.

CHAIR CRAMER: All right. Mr. Graczyk.

MR. GRACZYK: My name is Mike Graczyk, G-R-A-C-Z-Y-K, and 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. Who hasn't flown? Who hasn't learned to fly? And that's a good place to learn to fly. It's a good place to keep your
plane also.

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.

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.

So with that, I trust you do the best you can and keep up the good work.

CHAIR CRAMER: Thanks for your comments.

And then the last card I have, although others can certainly speak still, Mr. Krack.


I've been a pilot for over 50 years, I've flown out of MAC airports for just about all of that time, and I'm also the Chair of the Reliever Airports Advisory
Council, which is a MAC-sanctioned advisory group made up
of representatives from each of the airports, so I have
an interest in all of the relievers, as well as Anoka,
which I fly out of.

Well, I got an earful tonight. 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.

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, given the other objectives that they're trying
to achieve, so I think MAC has listened.

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.
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, 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.

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 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.

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. Thank you.

CHAIR CRAMER: Thank you. No more cards --

(Applause.)

CHAIR CRAMER: -- but is there anyone else who would like to speak this evening?

(No response.)

CHAIR CRAMER: All right. Seeing no one, we have heard from all speakers who asked to make comments tonight. I will officially adjourn this public hearing, although again I would ask if Ms. Bucheck and Mr. Brandt would be willing to submit their written comments to the court reporter just to help us get the record exactly right.

As a reminder, additional written comments must be submitted by the close of the comment period, 5:00 p.m., on April 19th, by mail to Chad Leqve, Director of Environment, Metropolitan Airports Commission, 6040-28th Avenue South, Minneapolis, Minnesota 55450, or by email to Chad Leqve, chad.leqve@mspmac.org.

Thank you all very much for coming tonight and participating in the environmental review process. This hearing is closed.

(Proceedings concluded at 8:05 p.m.)
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

[Signature]

Elizabeth J. Gangl
Registered Professional Reporter
Item F –
Draft Lake Elmo Airport EA/EAW Public Comments and Responses

[EA/EAW Appendix M]
Appendix M

Public Comments and Responses

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
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Lake Elmo Airport / Federal EA / State EAW

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 4th 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 30th Street North

This section contains responses to common concerns about realigning 30th 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 30th 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 30th and Neal as the safest and best possible intersection type and opposed a t-intersection with through traffic on 30th 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 30th Street North would not affect primary emergency response west of the Airport. The realigned segment of 30th 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 30th Street North. The realignment of 30th 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 30th Street North would not be used during its initial response to emergencies at any location within its service area. The primary use of 30th 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 30th 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 30th Street North realignment can be found in Chapter 2 and Appendix B of the EA/EAW.
ii. **30th will relocate right in front of homes**

Multiple commenters expressed concern about the proposed location of 30th 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 30th 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 30th and Neal. The proposed realignment alternative (Alternative 3) meets these criteria. The north-south portion of the realigned segment of 30th 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 aeronautical 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 30th 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. 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.

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 Used 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 30th 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).

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 79th 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/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.

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/

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. 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.

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.
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<th>Date</th>
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<tr>
<td>4/4/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Public Hearing - Verbal</td>
<td>1A</td>
<td>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.</td>
<td>See General Comment Response B(ii)</td>
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<tr>
<td>4/4/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Public Hearing - Verbal</td>
<td>1B</td>
<td>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.</td>
<td>See General Comment Response H</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Public Hearing - Verbal</td>
<td>1C</td>
<td>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;</td>
<td>See General Comment Response H</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Public Hearing - Verbal</td>
<td>1D</td>
<td>your comprehensive plan is not aligned with our township but you're proposing and pushing forward.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Public Hearing - Verbal</td>
<td>1E</td>
<td>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</td>
<td>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).</td>
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<tr>
<td>4/4/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Public Hearing - Verbal</td>
<td>1F</td>
<td>appears not to be very compatible with our township or the neighbors. 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.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Verbal</td>
<td>2A</td>
<td>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.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Verbal</td>
<td>2B</td>
<td>there's no guarantee that you guys aren't going to increase your airplanes. You say not but, again, there's no guarantee.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Verbal</td>
<td>2C</td>
<td>the MAC is not going to give me new windows; we just built there less than a year ago.</td>
<td>See General Comment Response S</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Verbal</td>
<td>2D</td>
<td>And then the removal of the land to expand the runway.</td>
<td>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.</td>
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<tr>
<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3A</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3B</td>
<td>Under Minnesota Statute 473.602, the MAC is vested with, among other things, &quot;in part, to providing for the most economical and effective use of aeronautical facilities and services in that area.&quot; … If not all airport operations are being used fully, then how can you possibly provide the most</td>
<td>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.</td>
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<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3C</td>
<td>I would encourage you to use the Holman Field.</td>
<td>See General Comment Response C(ii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3D</td>
<td>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?</td>
<td>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.</td>
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<tr>
<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3E</td>
<td>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</td>
<td>See General Comment Response C(v)</td>
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<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3F</td>
<td>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.</td>
<td>See General Comment Response F(ii)</td>
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<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3G</td>
<td>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.</td>
<td>See General Comment Response F(v)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3H</td>
<td>Your report also stated, &quot;No significant man-made wildlife attractants are located within one mile of the Airport.&quot; What about the holding ponds that some could call &quot;significant man-made wildlife attractants&quot; 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</td>
<td>See General Comment Response F(i)</td>
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<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3l</td>
<td>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.</td>
<td>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).</td>
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<tr>
<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3J</td>
<td>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.</td>
<td>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</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Public Hearing - Verbal</td>
<td>3K</td>
<td>You may even wish to collaborate with the New Richmond Wisconsin Airport.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Fred</td>
<td>Brandt</td>
<td>Public Hearing - Verbal</td>
<td>4A</td>
<td>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</td>
<td>See General Comment Response P</td>
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<td>4/4/2018</td>
<td>Troy</td>
<td>Wenck</td>
<td>Public Hearing - Verbal</td>
<td>5A</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>4/4/2018</td>
<td>Troy</td>
<td>Wenck</td>
<td>Public Hearing - Verbal</td>
<td>5B</td>
<td>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.</td>
<td>Comment noted.</td>
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<td>4/4/2018</td>
<td>Troy</td>
<td>Wenck</td>
<td>Public Hearing - Verbal</td>
<td>5B</td>
<td>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</td>
<td>Comment noted.</td>
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<td>4/4/2018</td>
<td>Troy</td>
<td>Wenck</td>
<td>Public Hearing - Verbal</td>
<td>5C</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>4/4/2018</td>
<td>Troy</td>
<td>Wenck</td>
<td>Public Hearing - Verbal</td>
<td>5D</td>
<td>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.</td>
<td>Comment noted.</td>
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<td>4/4/2018</td>
<td>Barry</td>
<td>Rosell</td>
<td>Public Hearing - Verbal</td>
<td>6A</td>
<td>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, &quot;Overall operation counts from all sources at the airport dipped from 118,000 in 2007 to 40,500 in 2017.&quot; 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, &quot;Where back in the 1980s it was See General Comment Response J(iv)</td>
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<td>4/4/2018</td>
<td>Barry</td>
<td>Rosell</td>
<td>Public Hearing - Verbal</td>
<td>6B</td>
<td>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.”</td>
<td>See General Comment Response C(iii)</td>
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<tr>
<td>4/4/2018</td>
<td>Barry</td>
<td>Rosell</td>
<td>Public Hearing - Verbal</td>
<td>6C</td>
<td>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 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.</td>
<td>See General Comment Response R</td>
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<tr>
<td>4/4/2018</td>
<td>Barry</td>
<td>Rosell</td>
<td>Public Hearing - Verbal</td>
<td>6D</td>
<td>the potential for larger and more aircraft here</td>
<td>See General Comment Response A(i)</td>
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<tr>
<td>4/4/2018</td>
<td>Barry</td>
<td>Rosell</td>
<td>Public Hearing - Verbal</td>
<td>6E</td>
<td>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.</td>
<td>See General Comment Response D</td>
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<tr>
<td>4/4/2018</td>
<td>Barry</td>
<td>Rosell</td>
<td>Public Hearing - Verbal</td>
<td>6F</td>
<td>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, &quot;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</td>
<td>See General Comment Response D</td>
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<td>4/4/2018</td>
<td>Barry</td>
<td>Rosell</td>
<td>Public Hearing - Verbal</td>
<td>6G</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
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<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Renwick</td>
<td>Public Hearing - Verbal</td>
<td>7A</td>
<td>I'm in support of the plan. I'm an airport user.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Renwick</td>
<td>Public Hearing - Verbal</td>
<td>7B</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Renwick</td>
<td>Public Hearing - Verbal</td>
<td>7C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8A</td>
<td>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.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8B</td>
<td>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,</td>
<td>See General Comment Responses C(v)</td>
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<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8C</td>
<td>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.</td>
<td>See General Comment Response C(i) and C(ii)</td>
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<tr>
<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8D</td>
<td>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</td>
<td>See General Comment Response C(i)</td>
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<tr>
<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8E</td>
<td>And as to the Holman Field, as somebody mentioned, it's dramatically underused right now as the other MAC airports are as well.</td>
<td>See General Comment Response C(ii) and J(iv)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8F</td>
<td>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.</td>
<td>See General Comment Response A(i) and D</td>
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<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8G</td>
<td>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.</td>
<td>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.</td>
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<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8H</td>
<td>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.</td>
<td>See General Comment Response D and Q</td>
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<tr>
<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8I</td>
<td>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.</td>
<td>See General Comment Response D and E</td>
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<tr>
<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8J</td>
<td>Section 13 of the Minnesota Constitution requires that before you take any action you must make sure that you can provide -- &quot;that</td>
<td>See General Comment Response S</td>
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<tr>
<td>4/4/2018</td>
<td>Mark</td>
<td>Wendorf</td>
<td>Public Hearing - Verbal</td>
<td>8K</td>
<td>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?</td>
<td>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. See also General Comment Response S</td>
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<tr>
<td>4/4/2018</td>
<td>Rob</td>
<td>Creibich</td>
<td>Public Hearing - Verbal</td>
<td>9A</td>
<td>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.</td>
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<td>4/4/2018</td>
<td>Rob</td>
<td>Creibich</td>
<td>Public Hearing - Verbal</td>
<td>9B</td>
<td>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.</td>
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<td>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.</td>
<td>See General Comment Response C(i) In addition, general aviation activity has been declining nationwide since 2000. Downward trends in general aviation.</td>
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<tr>
<td>4/4/2018</td>
<td>Rob</td>
<td>Creibich</td>
<td>Public Hearing - Verbal</td>
<td>9C</td>
<td>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.</td>
<td>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.</td>
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<td>4/4/2018</td>
<td>Rob</td>
<td>Creibich</td>
<td>Public Hearing - Verbal</td>
<td>9D</td>
<td>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</td>
<td>See General Comment Response I(i)</td>
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<tr>
<td>4/4/2018</td>
<td>Rob</td>
<td>Creibich</td>
<td>Public Hearing - Verbal</td>
<td>9E</td>
<td>do the right thing for federal taxpayers, and that is to reallocate these dollars to New Richmond and not duplicate the service there.</td>
<td>See General Comment Response C(i)</td>
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<td>4/4/2018</td>
<td>Rob</td>
<td>Creibich</td>
<td>Public Hearing - Verbal</td>
<td>9F</td>
<td>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.</td>
<td>See General Comment Response C(i)</td>
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<td>4/4/2018</td>
<td>Rob</td>
<td>Creibich</td>
<td>Public Hearing - Verbal</td>
<td>9G</td>
<td>This is federal tax dollars so we think we have a right to vie for those dollars.</td>
<td>See General Comment Response R</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10A</td>
<td>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 it was just a small,</td>
<td>See General Comment Response A(ii)</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10B</td>
<td>We all know and have heard tonight that the plan was created in 1965 when the community looked extremely different.</td>
<td>See General Comment Response H</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10C</td>
<td>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 &quot;other cumulative things&quot; 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.</td>
<td>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. 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 &quot;environmentally relevant area&quot; that might &quot;reasonably be expected to affect the same environmental resources.&quot; The Draft EA/EAW properly evaluates all cumulative impacts in accordance with NEPA and cumulative potential effects in accordance with MEPA. 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</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10D</td>
<td>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.</td>
<td>See General Comment Response O(i)</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10E</td>
<td>And again, the noise. Of course -- thank you everybody who has spoken tonight about the noise -- of course there will be excess noise.</td>
<td>See General Comment Response D</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10F</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10G</td>
<td>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</td>
<td>Comment noted.</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10H</td>
<td>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?</td>
<td>See General Comment Response I(i)</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10I</td>
<td>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.</td>
<td>See General Comment Response J(i)</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10J</td>
<td>It's small hobby planes, and we're spending, what was it, $14 million to help satisfy the hobby for a lot of people?</td>
<td>See General Comment Response J(iii)</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10K</td>
<td>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?</td>
<td>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 &quot;promote air navigation and transportation...in and through the state&quot; and to &quot;promote the efficient, safe, and economical handling of air commerce.&quot; 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...</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10L</td>
<td>it is incomprehensible that this volume of dollars would be spent for a project that is so unnecessary.</td>
<td>See General Comment Response J(i) and R</td>
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<td>4/4/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Public Hearing - Verbal</td>
<td>10M</td>
<td>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.</td>
<td>See General Comment Response B(i)</td>
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<td>4/4/2018</td>
<td>Patrick</td>
<td>Fleming</td>
<td>Public Hearing - Verbal</td>
<td>11A</td>
<td>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.</td>
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<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Verbal</td>
<td>12A</td>
<td>which are little cumbersome. I appreciate your work on this and I look forward to a 3,500-foot runway.</td>
<td>See General Comment Response T</td>
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<td>4/4/2018</td>
<td>Mark</td>
<td>Montanari</td>
<td>Public Hearing - Verbal</td>
<td>13A</td>
<td>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.</td>
<td>See General Comment Response D</td>
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<td>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.</td>
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<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14A</td>
<td>I live on Neal Avenue, and I have been to a number of these meetings. I'm opposed to the project.</td>
<td>Comment noted.</td>
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<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14B</td>
<td>Project seems unnecessary.</td>
<td>See General Comment Response J(i)</td>
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<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14C</td>
<td>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.</td>
<td>See General Comment Response I(iii)</td>
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<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14D</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
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<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14E</td>
<td>I don't mind the airport being here and I'd be fine with repaving the runway as it is, keep it existing.</td>
<td>See General Comment Response C(iii)</td>
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<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14F</td>
<td>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</td>
<td>See General Comment Response I(i) and I(iii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14G</td>
<td>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.</td>
<td>See General Comment Response J(ii)</td>
</tr>
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<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14H</td>
<td>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.</td>
<td>See General Comment Response R</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14I</td>
<td>it is public money. So there should be -- the prospect or the process, it just does not seem fair.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Seeber</td>
<td>Public Hearing - Verbal</td>
<td>14J</td>
<td>And at a number of points along the way the information that we've been given has not been correct.</td>
<td>See General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Graczyk</td>
<td>Public Hearing - Verbal</td>
<td>15A</td>
<td>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.</td>
<td>See General Comment Response Q</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Graczyk</td>
<td>Public Hearing - Verbal</td>
<td>15B</td>
<td>The airport is a good place to learn how to fly, and to keep one's aircraft</td>
<td>Comment noted</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Graczyk</td>
<td>Public Hearing - Verbal</td>
<td>15C</td>
<td>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.</td>
<td>Comment noted</td>
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<td>Date</td>
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<tr>
<td>4/4/2018</td>
<td>Mike</td>
<td>Graczyk</td>
<td>Public Hearing - Verbal</td>
<td>15D</td>
<td>You mentioned about some loud, lumbering, crash -- Beechcraft that crashed. That airplane was built in 1950-some. They don't operate 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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Krack</td>
<td>Public Hearing - Verbal</td>
<td>16A</td>
<td>[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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Krack</td>
<td>Public Hearing - Verbal</td>
<td>16B</td>
<td>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,</td>
<td>Comment noted.</td>
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<td>Date</td>
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<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Krack</td>
<td>Public Hearing - Verbal</td>
<td>16C</td>
<td>given the other objectives that they're trying to achieve, so I think MAC has listened.</td>
<td></td>
</tr>
<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Krack</td>
<td>Public Hearing - Verbal</td>
<td>16C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Krack</td>
<td>Public Hearing - Verbal</td>
<td>16D</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Krack</td>
<td>Public Hearing - Verbal</td>
<td>16E</td>
<td>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.</td>
<td></td>
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<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Krack</td>
<td>Public Hearing - Verbal</td>
<td>16F</td>
<td>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</td>
<td>Comment noted. See also Appendix A of the EA/EAW for runway length discussion.</td>
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<td>Date</td>
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<tr>
<td>4/4/2018</td>
<td>John</td>
<td>Krack</td>
<td>Public Hearing - Verbal</td>
<td>16G</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17A</td>
<td>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.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17B</td>
<td>Funds to New Richmond airport $11.5 million</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17C</td>
<td>City Comprehensive Plan of Lake Elmo has safety zones that were recently eliminated to aid the developments like Easton Village &amp; other developments in surrounding areas.</td>
<td>See General Comment Response F(ii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17D</td>
<td>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</td>
<td>See General Comment Response F(ii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17E</td>
<td># of aircraft at Lake Elmo Airport continues to decrease to 183</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17F</td>
<td>Do not fill in wetlands, they recharge the aquifer.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17G</td>
<td>Disrupting and removing the woodlands is yet another assault on the environment, noise very disruptive</td>
<td>See General Comment Response D, M(i), and M(ii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17H</td>
<td>Road realignment, not</td>
<td>See General Comment Response B</td>
</tr>
<tr>
<td>Date</td>
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<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17I</td>
<td>How can wetlands be moved to another part of the state and still be beneficial to Washington County?</td>
<td>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>.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17J</td>
<td>A full EIS must be done if residents ignored</td>
<td>See General Comment Response T</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Public Hearing - Written</td>
<td>17K</td>
<td>I support our airport &amp; do not want it to close.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Scott</td>
<td>O'Connor</td>
<td>Public Hearing - Written</td>
<td>18A</td>
<td>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 &quot;more&quot; from 21D, but I will be able to fly &quot;more safely.&quot;</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Scott</td>
<td>O'Connor</td>
<td>Public Hearing - Written</td>
<td>18B</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Written</td>
<td>19B</td>
<td>I live in Easton Village and the noise currently is unbearable.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Written</td>
<td>19C</td>
<td>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.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Written</td>
<td>19D</td>
<td>I highly doubt the MAC will fund the surrounding neighborhoods with new noise reduction windows.</td>
<td>See General Comment Response S</td>
</tr>
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<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Written</td>
<td>19E</td>
<td>I believe MAC is lying about the fact that there will not be bigger planes.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Written</td>
<td>19F</td>
<td>I am also concerned about the loss of land, trees, and water areas.</td>
<td>See General Comment Response L(i), M(i), and N</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Written</td>
<td>19G</td>
<td>I feel the neighbors close to 30th Street will have the new road and expansion in their backyard.</td>
<td>See General Comment Response B(ii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Written</td>
<td>19H</td>
<td>Lastly, I am concerned with the safety of me, and family. There is a potential of a plane crash in my neighborhood.</td>
<td>See General Comment Response F(v)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Janel</td>
<td>Surgenor</td>
<td>Public Hearing - Written</td>
<td>19I</td>
<td>Increase of traffic on Manning Ave that would cause traffic accidents and car-pedestrian accidents</td>
<td>See General Comment Response B(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>John</td>
<td>Regenold</td>
<td>Mail</td>
<td>20A</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Raymond</td>
<td>Lucksinger</td>
<td>Mail</td>
<td>21A</td>
<td>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 commemorative air force at Fleming Field.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Raymond</td>
<td>Lucksinger</td>
<td>Mail</td>
<td>21B</td>
<td>I believe MAC is doing a very good job of running the airports and am for the preferred alternative plan.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Raymond</td>
<td>Lucksinger</td>
<td>Mail</td>
<td>21C</td>
<td>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.</td>
<td>See General Comment Response K</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Susan</td>
<td>Markgraf</td>
<td>Mail</td>
<td>22A</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23A</td>
<td>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</td>
<td>See General Comment Response B(i)</td>
</tr>
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<td>Date</td>
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<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23B</td>
<td>possible access for emergency services. It may also force daily commuter traffic through my neighborhood.</td>
<td></td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23C</td>
<td>Potential for ground water contamination in our wells, due to disruption of current watershed.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23D</td>
<td>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.</td>
<td>See General Comment Response M(ii) and E</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23E</td>
<td>Extended runways are being proposed without zoning, which puts pilots and residents at risk.</td>
<td>See General Comment Response F(ii)</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23F</td>
<td>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.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23G</td>
<td>Downtown St. Paul and New Richmond should be considered as alternatives.</td>
<td>See General Comment Response C(i) and C(ii)</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23H</td>
<td>Longer runways mean larger/noisier planes. I already have planes flying low over my house, I don't want more.</td>
<td>See General Comment Response A(i) and D</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Wade</td>
<td>Rastall</td>
<td>Mail</td>
<td>23I</td>
<td>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.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/11/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Mail</td>
<td>24A</td>
<td>I attended the April 4, 2018 proposed Lake Elmo Airport Expansion meeting and oppose the expansion.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/11/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Mail</td>
<td>24B</td>
<td>[I] do support maintaining the existing footprint.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/11/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Mail</td>
<td>24C</td>
<td>After the meeting I went home and reviewed the Long Term Comprehensive Plan for Lake Elmo Airport (21D) June 2008. Chapter 1 &quot;The activity at the Lake Elmo Airport has been declining.&quot; Chapter 2 &quot;The number of based aircraft is expected to increase from 236 in 2005, 291 in 2010, to 312 in 2025&quot; (The number mentioned at the airport April 4,</td>
<td>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</td>
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<tr>
<td>4/11/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Mail</td>
<td>24D</td>
<td>2018 was 183.)<em>micro jet operation is projected by 2025</em></td>
<td>LTCP. See also General Comment Response J(iv).</td>
</tr>
<tr>
<td>4/11/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Mail</td>
<td>24E</td>
<td>Please consider the New Richmond option as presented 4/4/2018.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/11/2018</td>
<td>Susan</td>
<td>Dunn</td>
<td>Mail</td>
<td>24E</td>
<td>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.</td>
<td>See General Comment Response F(iv)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ronald</td>
<td>Fredkove</td>
<td>Mail</td>
<td>25A</td>
<td>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 &amp; railroad tracks and then complaining.</td>
<td>See General Comment Response F(iv)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ronald</td>
<td>Fredkove</td>
<td>Mail</td>
<td>25B</td>
<td>I'm all for redoing 30th St for the expansion of the runway.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/2/2018</td>
<td>Susan</td>
<td>Winsor</td>
<td>Email</td>
<td>26A</td>
<td>I very much oppose expanding the Lake Elmo airport.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/2/2018</td>
<td>Susan</td>
<td>Winsor</td>
<td>Email</td>
<td>26B</td>
<td>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.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/2/2018</td>
<td>Susan</td>
<td>Winsor</td>
<td>Email</td>
<td>26C</td>
<td>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</td>
<td>See General Comment Response D</td>
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<tr>
<td>4/2/2018</td>
<td>Susan</td>
<td>Winsor</td>
<td>Email</td>
<td>26E</td>
<td>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 &quot;relief.&quot;</td>
<td>See General Comment Response C(ii)</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Steve</td>
<td>Johnson</td>
<td>Email</td>
<td>27A</td>
<td>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.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Steve</td>
<td>Johnson</td>
<td>Email</td>
<td>27B</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Steve</td>
<td>Johnson</td>
<td>Email</td>
<td>27C</td>
<td>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</td>
<td>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</td>
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<tr>
<td>4/5/2018</td>
<td>Steve</td>
<td>Johnson</td>
<td>Email</td>
<td>27D</td>
<td>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.</td>
<td>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. 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.</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Steve</td>
<td>Johnson</td>
<td>Email</td>
<td>27E</td>
<td>The safety issue is significant, and added to that is the presence in the road ditch of an extensive infestation of wild parsnip (Pastinaca 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.</td>
<td>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.</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Jonathan</td>
<td>Schmelz</td>
<td>Email</td>
<td>28A</td>
<td>(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.</td>
<td>See response to 27C</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Jonathan</td>
<td>Schmelz</td>
<td>Email</td>
<td>28B</td>
<td>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.</td>
<td>Comment noted.</td>
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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
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<td></td>
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<td></td>
<td>28C</td>
<td>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.</td>
<td></td>
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<tr>
<td>4/5/2018</td>
<td>Jonathan</td>
<td>Schmelz</td>
<td>Email</td>
<td>28C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Jonathan</td>
<td>Schmelz</td>
<td>Email</td>
<td>28D</td>
<td>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</td>
<td>See General Comment Response A(i)</td>
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<tr>
<td>4/5/2018</td>
<td>Jonathan</td>
<td>Schmelz</td>
<td>Email</td>
<td>28E</td>
<td>class of aircraft; your proposal is only 3500 feet.</td>
<td></td>
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<tr>
<td>4/5/2018</td>
<td>Jonathan</td>
<td>Schmelz</td>
<td>Email</td>
<td>28F</td>
<td>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.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/5/2018</td>
<td>Jonathan</td>
<td>Schmelz</td>
<td>Email</td>
<td>28G</td>
<td>Lastly, although I personally preferred other alternatives to the Lake Elmo Airport Improvement, I wholly support the latest</td>
<td>Comment noted</td>
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<tr>
<td>4/4/2018</td>
<td>Rod</td>
<td>Ough</td>
<td>Email</td>
<td>29A</td>
<td>The 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.</td>
<td></td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Rod</td>
<td>Ough</td>
<td>Email</td>
<td>29B</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Rod</td>
<td>Ough</td>
<td>Email</td>
<td>29C</td>
<td>I understood the primary concern was the noise. The adjustment to the plan has eliminated much or all of that.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Rod</td>
<td>Ough</td>
<td>Email</td>
<td>29D</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Rod</td>
<td>Ough</td>
<td>Email</td>
<td>29E</td>
<td>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 change). 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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Rod</td>
<td>Ough</td>
<td>Email</td>
<td>29F</td>
<td>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.</td>
<td>See General Comment Response C(i)</td>
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<tr>
<td>4/4/2018</td>
<td>Rod</td>
<td>Ough</td>
<td>Email</td>
<td>29F</td>
<td>Go to St Paul airport. Control tower. Jets. Controls airspace. Time/cost to fly out of cities.</td>
<td>See General Comment Response C(ii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Rod</td>
<td>Ough</td>
<td>Email</td>
<td>29G</td>
<td>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.</td>
<td>See General Comment Response C(v)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Diane</td>
<td>McGann</td>
<td>Email</td>
<td>30A</td>
<td>I encourage your opposition to the expansion of the Lake Elmo airport.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Diane</td>
<td>McGann</td>
<td>Email</td>
<td>30B</td>
<td>It is located in the middle of residential neighborhoods</td>
<td>See General Comment Response F(ii)</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Diane</td>
<td>McGann</td>
<td>Email</td>
<td>30C</td>
<td>The airport is home to several pilots-in-training who fly at low altitudes over homes in the area.</td>
<td>See General Comment Response C</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Diane</td>
<td>McGann</td>
<td>Email</td>
<td>30D</td>
<td>The airport is home to several pilots-in-training who fly at low altitudes over homes in the area.</td>
<td>See General Comment Response Q</td>
</tr>
<tr>
<td>4/4/2018</td>
<td>Diane</td>
<td>McGann</td>
<td>Email</td>
<td>30E</td>
<td>I urge demolition of this airport, rather than expansion, and encourage your resistance to the expansion plan.</td>
<td>See General Comment Response C(iv)</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Dave</td>
<td>Becker</td>
<td>Email</td>
<td>31A</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Dave</td>
<td>Becker</td>
<td>Email</td>
<td>31B</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Dave</td>
<td>Becker</td>
<td>Email</td>
<td>31C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/7/2018</td>
<td>Eric</td>
<td>Lobner</td>
<td>Email</td>
<td>32A</td>
<td>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</td>
<td>Comment noted.</td>
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<tr>
<td>4/7/2018</td>
<td>Eric</td>
<td>Lobner</td>
<td>Email</td>
<td>32B</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/7/2018</td>
<td>Eric</td>
<td>Lobner</td>
<td>Email</td>
<td>32C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/7/2018</td>
<td>Eric</td>
<td>Lobner</td>
<td>Email</td>
<td>32D</td>
<td>I am concerned about the amount of misinformation 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.</td>
<td>See General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/7/2018</td>
<td>Eric</td>
<td>Lobner</td>
<td>Email</td>
<td>32E</td>
<td>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</td>
<td>Comment noted.</td>
</tr>
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<td>Date</td>
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<tr>
<td>4/15/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>33A</td>
<td>21D and voice my support for the proposed modifications to Lake Elmo.</td>
<td>See General Comment Response L(i) and M(i)</td>
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<td>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.</td>
<td></td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>33B</td>
<td>Since MAC is a State agency, it should encompass what another state agency, the Minnesota State Lottery mission is: &quot;Restore, enhance and protect high-quality habitat for Minnesota wildlife, fight invasive species, protect native species and improve air and water quality.&quot; Why does MAC conflict a sister Agency?</td>
<td>The MAC is not a state agency. See also General Comment Response I(ii)</td>
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<td>The MAC is not a state agency. See also General Comment Response I(ii)</td>
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<tr>
<td>4/15/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>33C</td>
<td>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.</td>
<td>See General Comment Response L(i)</td>
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<td>See General Comment Response L(i)</td>
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<tr>
<td>4/15/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>33D</td>
<td>The pilots should pay for any and all improvements designated by MAC because, after all, it's the pilots' Country Club.</td>
<td>See General Comment Response J(iii)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>33E</td>
<td>PS. I expect a personal written reply from MAC.</td>
<td>See General Comment Response U</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>34A</td>
<td>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 (&quot;RPBB&quot;) 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.</td>
<td>See General Comment Response L(ii)</td>
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<tr>
<td>4/14/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>34B</td>
<td>[21D] was built in 1951 and MAC's outdated expansion plan is from 1965 and has been abandoned previously.</td>
<td>See General Comment Response H</td>
</tr>
<tr>
<td>4/14/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>34C</td>
<td>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.</td>
<td>See General Comment Response C(i) and C(ii)</td>
</tr>
<tr>
<td>4/14/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>34D</td>
<td>PS. I Expect a personal written reply from MAC.</td>
<td>See General Comment Response U</td>
</tr>
<tr>
<td>4/14/2018</td>
<td>Norman</td>
<td>Jones</td>
<td>Email</td>
<td>35A</td>
<td>I'm writing in favor of the proposed improvements to the Lake Elmo airport.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/14/2018</td>
<td>Norman</td>
<td>Jones</td>
<td>Email</td>
<td>35B</td>
<td>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</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/14/2018</td>
<td>Norman</td>
<td>Jones</td>
<td>Email</td>
<td>35C</td>
<td>I worry sometimes with the runway length, leaving little margin of safety for failure, weather, miscalculation, or mechanical issue.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/14/2018</td>
<td>Norman</td>
<td>Jones</td>
<td>Email</td>
<td>35D</td>
<td>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</td>
<td>Comment noted.</td>
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<tr>
<td>4/15/2018</td>
<td>Ben</td>
<td>Ross</td>
<td>Email</td>
<td>36</td>
<td>A</td>
<td>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.</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Ben</td>
<td>Ross</td>
<td>Email</td>
<td>36</td>
<td>B</td>
<td>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.</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Ben</td>
<td>Ross</td>
<td>Email</td>
<td>36</td>
<td>C</td>
<td>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).</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Ben</td>
<td>Ross</td>
<td>Email</td>
<td>36</td>
<td>C</td>
<td>If the airport doesn't meet their needs they can go elsewhere, for example River Falls.</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Helen</td>
<td>Kernik</td>
<td>Email</td>
<td>37</td>
<td>A</td>
<td>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</td>
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<tr>
<td>4/14/2018</td>
<td>Pete</td>
<td>Widin</td>
<td>Email</td>
<td>38A</td>
<td>reconfiguration of 30th street will greatly reduce traffic safety in this area. This proposal should be rejected.</td>
<td>See General Comment Response J(i)</td>
</tr>
<tr>
<td>4/14/2018</td>
<td>Pete</td>
<td>Widin</td>
<td>Email</td>
<td>38B</td>
<td>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 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. 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. 4) There are now neighborhoods right across the street from the airport which will be a constant source of complaints and safety/nuisance issues</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/14/2018</td>
<td>Pete</td>
<td>Widin</td>
<td>Email</td>
<td>38C</td>
<td>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</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39A</td>
<td>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</td>
<td>Comment noted.</td>
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<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39B</td>
<td>opposition that was in attendance was approximately 1% of the 11,000 plus population in the affected townships.</td>
<td>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.</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39D</td>
<td>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</td>
<td>Comment Noted.</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39E</td>
<td>[Downtown Saint Paul has] increased air traffic and larger planes, which create more hazards for small planes, as we also do for them.</td>
<td>See General Comment Response C(ii)</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39F</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39G</td>
<td>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.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39H</td>
<td>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.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/6/2018</td>
<td>Derek</td>
<td>Gilbert</td>
<td>Email</td>
<td>39I</td>
<td>In closing I have been impressed with the effort that MAC has put forth to listen to our</td>
<td>See General Comment Response I(i)</td>
</tr>
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<tr>
<td>4/11/2018</td>
<td>Craig</td>
<td>Berggren</td>
<td>Email</td>
<td>40A</td>
<td>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.</td>
<td>See General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/11/2018</td>
<td>Craig</td>
<td>Berggren</td>
<td>Email</td>
<td>40B</td>
<td>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.</td>
<td>The proposed action includes installation of appropriate signage on all runways and taxiways, in accordance with applicable FAA guidance.</td>
</tr>
<tr>
<td>4/11/2018</td>
<td>Craig</td>
<td>Berggren</td>
<td>Email</td>
<td>40C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/11/2018</td>
<td>Craig</td>
<td>Berggren</td>
<td>Email</td>
<td>40D</td>
<td>Moving ahead with this project will only make Lake Elmo Airport a more safer reliever airport for the twin cities.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Michelle</td>
<td>Rose</td>
<td>Email</td>
<td>41A</td>
<td>I am writing to express my strong support in favor of the MAC &quot;No Action&quot; plan in regards to not expanding the runways at the Lake Elmo Airport.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Michelle</td>
<td>Rose</td>
<td>Email</td>
<td>41B</td>
<td>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</td>
<td>See General Comment Response F(v)</td>
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<tr>
<td>4/15/2018</td>
<td>Michelle</td>
<td>Rose</td>
<td>Email</td>
<td>41C</td>
<td>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.</td>
<td>See General Comment Responses B and N</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Michelle</td>
<td>Rose</td>
<td>Email</td>
<td>41D</td>
<td>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.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Michelle</td>
<td>Rose</td>
<td>Email</td>
<td>41E</td>
<td>There are other airports nearby (New Richmond, for example), that can handle larger aircraft.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42A</td>
<td>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:</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42B</td>
<td>Neighboring airports (Holman Field and New Richmond Regional) are underutilized. These airports provide convenient alternatives to the Lake Elmo Airport.</td>
<td>See General Comment Response C(i), C(ii), and J(iv)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42C</td>
<td>Quoting the March 31 Pioneer Press article about Holman Field, &quot;it has had flights decrease from 118,000 in 2007 to 40,500 in 2017.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42D</td>
<td>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.</td>
<td>See General Comment Response C(i) and C(v)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42E</td>
<td>Why are &quot;we&quot; pouring $11-14,000,000 into Lake Elmo airport, when these other nearby airports are open and underutilized?</td>
<td>See General Comment Response J(iv) and R</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42F</td>
<td>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.</td>
<td>See General Comment Response A(ii)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42G</td>
<td>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</td>
<td>See General Comment Response B(i)</td>
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<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42H</td>
<td>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.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42I</td>
<td>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.</td>
<td>See General Comment Response F(iii)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42J</td>
<td>The neighborhoods surrounding the Lake Elmo Airport have been extensively built up over the last 20+ years and continue to do so.</td>
<td>See General Comment Response F(iv)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42K</td>
<td>Neighboring homeowners were not informed of this expansion ‘plan’ when we bought/built our homes.</td>
<td>See General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42L</td>
<td>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).</td>
<td>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.</td>
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<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42M</td>
<td>There is significant potential for increased groundwater contamination in our wells due to the disruption of the current watershed with this project.</td>
<td>See also General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Karen</td>
<td>Baltzer</td>
<td>Email</td>
<td>42N</td>
<td>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.</td>
<td>See General Comment Response B(i) and C</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Amy</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>43A</td>
<td>I am writing to tell you I am opposed to the proposed moving and lengthening of the main runway in Lake Elmo.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Amy</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>43B</td>
<td>I don’t feel you have adequate remediation proposed for removal of the 20+ acres of trees</td>
<td>See General Comment Response M(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Amy</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>43C</td>
<td>I don’t feel you have adequate remediation proposed for removal of 2.36 acres of wetlands.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Amy</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>43D</td>
<td>The impacts to the neighbors will be unacceptable. Currently the trees add a buffer to light and noise pollution from the airport.</td>
<td>See General Comment Response M(ii)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Amy</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>43E</td>
<td>Also the impact of moving 30th Street North will bring the planes closer to established neighborhoods, increasing noise and safety concerns to residents.</td>
<td>See General Comment Response F(ii)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Amy</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>43F</td>
<td>Please change this plan and leave the runway in its current position.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Kathryn</td>
<td>Bach</td>
<td>Email</td>
<td>44A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport for the following reasons:</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Kathryn</td>
<td>Bach</td>
<td>Email</td>
<td>44B</td>
<td>the potential for further ground water contamination. Ground water and its preservation is essential to the continued health of our community.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Kathryn</td>
<td>Bach</td>
<td>Email</td>
<td>44C</td>
<td>loss of trees and natural habitat. The pollinator population, especially, depends on the natural habitat and wetlands in and around the Lake Elmo area.</td>
<td>See General Comment Response L(i)</td>
</tr>
<tr>
<td>Date</td>
<td>First Name</td>
<td>Last Name</td>
<td>Source</td>
<td>Comment ID</td>
<td>Comment</td>
<td>Response</td>
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<tr>
<td>4/16/2018</td>
<td>Kathryn</td>
<td>Bach</td>
<td>Email</td>
<td>44D</td>
<td>loss of property value. Noise pollution, light pollution, and rerouting of roads will change the value of existing properties.</td>
<td>See General Comment Response K</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Kathryn</td>
<td>Bach</td>
<td>Email</td>
<td>44E</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45A</td>
<td>Regarding the Lake Elmo Airport expansion that most people do not want, that would ruin our neighborhood</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45B</td>
<td>and would be financially irresponsible...Please listen to the people!</td>
<td>See General Comment Response J(i) and R</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45C</td>
<td>We are in favor of the MAC &quot;No Action&quot; plan, which would allow the MAC to repair or rebuild the current runways in their current locations and at the current lengths.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45D</td>
<td>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.</td>
<td>See General Comment Response I(ii)</td>
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<tr>
<td>4/16/2018</td>
<td>James</td>
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<td>Email</td>
<td>45E</td>
<td>30th St relocation unsafe</td>
<td>See General Comment Response B(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45F</td>
<td>Further ground water contamination</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45G</td>
<td>Lack of Zoning</td>
<td>See General Comment Response F</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45H</td>
<td>Major loss of property value</td>
<td>See General Comment Response K</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45I</td>
<td>Larger aircraft are unwanted</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45J</td>
<td>Loss and damage to wildlife</td>
<td>See General Comment Response L(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45K</td>
<td>Added noise and light pollution</td>
<td>See General Comment Response D and E</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45L</td>
<td>Loss of trees and natural habitat</td>
<td>See General Comment Response L(i) and M(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45M</td>
<td>There are airports within 20 mi of Lk Elmo that are under-utilized that can accept the larger aircraft</td>
<td>See General Comment Response C</td>
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<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45N</td>
<td>New Richmond wants and welcomes this added traffic to their airport.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>James</td>
<td>Ulasich</td>
<td>Email</td>
<td>45O</td>
<td>The people from this area DO NOT want this expansion..... Just fix what is already there. Be sensible.....</td>
<td>See General Comment Response I(i) and C(iii)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>46A</td>
<td>I am opposed to any expansion at the Lake Elmo Airport.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>Date</td>
<td>First Name</td>
<td>Last Name</td>
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<tr>
<td>4/16/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>46B</td>
<td>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.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>46C</td>
<td>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.</td>
<td>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</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>46D</td>
<td>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.</td>
<td>See General Comment Response I(ii)</td>
</tr>
<tr>
<td>Date</td>
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<tr>
<td>4/16/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>47D</td>
<td>Removal of 20 acres woodlands is certainly extensive—not a needed improvement.</td>
<td>See General Comment Response M(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>47E</td>
<td>It's time MAC steps up and tells the world it does not speak truthfully.</td>
<td>See General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>47F</td>
<td>PS. I Expect a personal written reply from MAC.</td>
<td>See General Comment Response U</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Richard</td>
<td>Weyrauch</td>
<td>Email</td>
<td>48A</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Richard</td>
<td>Weyrauch</td>
<td>Email</td>
<td>48B</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Richard</td>
<td>Weyrauch</td>
<td>Email</td>
<td>48C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/15/2018</td>
<td>Richard</td>
<td>Weyrauch</td>
<td>Email</td>
<td>48D</td>
<td>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</td>
<td>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.</td>
</tr>
<tr>
<td>Date</td>
<td>First Name</td>
<td>Last Name</td>
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<tr>
<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49A</td>
<td>Regarding the Lake Elmo Airport expansion that most people do not want, that would ruin our neighborhood.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49B</td>
<td>and would be financially irresponsible...Please listen to the people!</td>
<td>See General Comment Response J(i) and R</td>
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<td>4/16/2018</td>
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<td>We are in favor of the MAC &quot;No Action&quot; plan, which would allow the MAC to repair or rebuild the current runways in their current locations and at the current lengths.</td>
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<td>4/16/2018</td>
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<td>Email</td>
<td>49D</td>
<td>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.</td>
<td>See General Comment Response I(ii)</td>
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<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49E</td>
<td>30th St relocation unsafe</td>
<td>See General Comment Response B(i)</td>
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<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49F</td>
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<td>See General Comment Response N</td>
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<td>Ulasich</td>
<td>Email</td>
<td>49G</td>
<td>Lack of Zoning</td>
<td>See General Comment Response F</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49H</td>
<td>Major loss of property value</td>
<td>See General Comment Response K</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49I</td>
<td>Larger aircraft are unwanted</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49J</td>
<td>Loss and damage to wildlife</td>
<td>See General Comment Response L(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49K</td>
<td>Added noise and light pollution</td>
<td>See General Comment Response D and E</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49L</td>
<td>Loss of trees and natural habitat</td>
<td>See General Comment Response L(i) and M(i)</td>
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<td>Linda</td>
<td>Ulasich</td>
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<td>Linda</td>
<td>Ulasich</td>
<td>Email</td>
<td>49O</td>
<td>The people from this area DO NOT want this expansion. Just fix what is already there.</td>
<td>See General Comment Response C(iii) and I(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Scott</td>
<td>Hanson</td>
<td>Email</td>
<td>50A</td>
<td>I am a pilot and user of the Lake Elmo airport and support the enhancements and safety improvements being made to the airport grounds.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Scott</td>
<td>Hanson</td>
<td>Email</td>
<td>50B</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>Date</td>
<td>First Name</td>
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</tr>
<tr>
<td>4/16/2018</td>
<td>Scott</td>
<td>Hanson</td>
<td>Email</td>
<td>50C</td>
<td>I wish the improvements would have included the original longer runway and that the improvements would have been completed “yesterday”</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Scott</td>
<td>Hanson</td>
<td>Email</td>
<td>50D</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Scott</td>
<td>Hanson</td>
<td>Email</td>
<td>50E</td>
<td>I hope the MAC will continue to attempt to educate the community and dispel the misinformation being spread by potentially emotional public members.</td>
<td>See General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Mick</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>51A</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Mick</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>51B</td>
<td>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.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Mick</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>51C</td>
<td>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.</td>
<td>See General Comment Response O(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Mick</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>51D</td>
<td>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?</td>
<td>See General Comment Response O(ii)</td>
</tr>
<tr>
<td>Date</td>
<td>First Name</td>
<td>Last Name</td>
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</tr>
<tr>
<td>4/16/2018</td>
<td>Mick</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>51E</td>
<td>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?</td>
<td>See General Comment Response O(i)</td>
</tr>
<tr>
<td>4/16/2018</td>
<td>Mick</td>
<td>Kaschmitter</td>
<td>Email</td>
<td>51F</td>
<td>Please reconsider and change to the No-Action Alternative.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>52A</td>
<td>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.</td>
<td>See General Comment Response H</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>52B</td>
<td>There will be enormous excavation work causing soil disturbances.</td>
<td>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</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>52C</td>
<td>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?</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>52D</td>
<td>MAC should cause no additional harm to neighbors and wildlife and its habitats. Rebuild the existing runways &quot;as is&quot; to keep the environmental impact as low as possible to our communities.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>52E</td>
<td>PS. I expect a personal written reply from MAC.</td>
<td>See General Comment Response U</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53A</td>
<td>I live in West Lakeland township on 30th and Neal Avenue, directly across from the Comment noted.</td>
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<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53B</td>
<td>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.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53C</td>
<td>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.</td>
<td>See General Comment Response B</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53D</td>
<td>not to mention the destruction of the trees, most of which have already been here longer than I have</td>
<td>See General Comment Response M(i)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53E</td>
<td>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.</td>
<td>See General Comment Response L(i)</td>
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<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53F</td>
<td>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.</td>
<td>See General Comment Response B(ii)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53G</td>
<td>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</td>
<td>See General Comment Response M(ii)</td>
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<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53H</td>
<td>much closer to home and will be a much larger annoyance than it is now.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53I</td>
<td>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.</td>
<td>See General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53J</td>
<td>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.</td>
<td>See General Comment Response R</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53K</td>
<td>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.</td>
<td>See General Comment Response O(i)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53L</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
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<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53M</td>
<td>There also doesn’t appear to be a real need for this.</td>
<td>See General Comment Response J(i)</td>
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<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53N</td>
<td>I’m not aware of the exact distances involved, but there’s the New Richmond airport and downtown St. Paul airport very close by.</td>
<td>See General Comment Response C(i) and C(ii)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53O</td>
<td>the fiscal responsibility in spending millions of dollars to expand a runway when there are viable alternatives close by seems very wasteful.</td>
<td>See General Comment Response J(i) and R</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53P</td>
<td>Finally there’s what it will do to property values in the area.</td>
<td>See General Comment Response K</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Richard</td>
<td>Gergen</td>
<td>Email</td>
<td>53Q</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54A</td>
<td>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.</td>
<td>See responses to comments 54B through 54BO below.</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54B</td>
<td>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.</td>
<td>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</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54C</td>
<td>Airport's long-term plan and does not even mention the EA / EAW. Perhaps another meeting is required?</td>
<td>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. 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.</td>
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<td>The easement mentioned for the existing 30th street is a prescriptive easement and there is nothing in Minnesota Statues 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.</td>
<td>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</td>
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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 30th 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.

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.’

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
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54G</td>
<td>flights discussed during the public hearing process was in single digits annually. The specific aircraft that would be restricted have not been appropriately defined.</td>
<td>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.</td>
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<td>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).</td>
<td>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</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54H</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54I</td>
<td>Page 3-2 Paragraph 3.2.1 refers to incompatible land uses in the RPZ. It should be noted that MAC allowed the construction</td>
<td>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.”</td>
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The proposed action will move Runway 14/32 further away from the stormwater retention pond located west of Manning
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54J</td>
<td>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.</td>
<td>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</td>
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<td>of a dike and runoff water retention pond in the existing RPZ west of Manning without taking any action to curtail that construction.</td>
<td>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.</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54K</td>
<td>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.</td>
<td>Based at Lake Elmo are registered to corporations. 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)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54L</td>
<td>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</td>
<td>See General Comment Response A(ii)</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54M</td>
<td>'private' aircraft use is diminishing as reported by MAC in the April 1 issue of the St. Paul Pioneer Press.</td>
<td>See General Comment Response J(iv)</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54N</td>
<td>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.</td>
<td>As noted in the introduction to Chapter 3, &quot;FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions,&quot; 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.&quot; The alternatives considered during the LTCP process, with additional alternatives identified during the EA/EAW process are presented in Chapter 3 of the</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54O</td>
<td>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!</td>
<td>Draft EA/EAW, in accordance with FAA Order 5050.4B.</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54P</td>
<td>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.</td>
<td>See General Comment Response H</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54Q</td>
<td>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.’</td>
<td>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.</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54R</td>
<td>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.</td>
<td>See General Comment Response F(iii)</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54S</td>
<td>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</td>
<td>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.</td>
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<td>4/17/2018</td>
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<td>54T</td>
<td>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?</td>
<td>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. 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.</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54U</td>
<td>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 though the fence. This is evident along both 30th street and along Neal Avenue.</td>
<td>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.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54V</td>
<td>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.</td>
<td>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</td>
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</table>

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.
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54W</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54X</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54Y</td>
<td>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</td>
<td>The information shown in the figure matches the categories referenced in the legend.</td>
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<td>See General Comment Responses O(i) and O(ii)</td>
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<td>4/17/2018</td>
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<td>54Z</td>
<td>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.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AA</td>
<td>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?).</td>
<td>How on earth did MAC determine that over half the traffic is military? Can you really tell that based on noise data?</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AB</td>
<td>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.)</td>
<td>Operations shown in Table 4-1 of the Draft EA/EAWE were estimated for the 12 months ending 10/31/2016 by extrapolating from the best available data.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AC</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AD</td>
<td>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.</td>
<td>Both of these restaurants are located on Stillwater Blvd as depicted in the Draft EA/EAWE.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AE</td>
<td>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?</td>
<td>The dining establishments listed on Page 4-8 of the Draft EA/EAWE 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.</td>
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<td>4/17/2018</td>
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<td>Anderson</td>
<td>Email</td>
<td>54AJ</td>
<td>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.</td>
<td>Figure 4-8 shows wetland boundaries mapped by Mead &amp; Hunt and the U.S. Fish &amp; Wildlife Service, while Figure 4-9 shows floodplain boundaries mapped by the Federal Emergency Management Agency (FEMA).</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AK</td>
<td>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.</td>
<td>This sentence was phrased incorrectly and will be updated in the Final EA/EAW to read as follows: &quot;Saturation was the primary indicator of wetland hydrology along with several secondary indicators.&quot;</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AL</td>
<td>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.</td>
<td>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>.</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AM</td>
<td>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.</td>
<td>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.</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AN</td>
<td>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.</td>
<td>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.</td>
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<td>4/17/2018</td>
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<td>54AO</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AP</td>
<td>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.</td>
<td>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 &quot;limited maintenance&quot; 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 &quot;hot spot&quot; 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 30th 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. The proposed action would lengthen 30th Street North by approximately one-quarter mile. Specific typical emissions factors for NAAQS criteria pollutants were applied to Washington County traffic forecasts to</td>
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<td>estimate the increases in pollutant emissions associated with the proposed additional length of 30th 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 NOX emissions increase would be 151 lbs/yr, the estimated SO2 emissions increase would be 3 lbs/yr, the estimated PM10 emissions increase would be 10 lbs/yr, the estimated PM2.5 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 de minimis thresholds. When combined with estimated changes in aircraft operational emissions, estimated increases in vehicle emissions associated with lengthening 30th Street North do not exceed the de minimis 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. 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.</td>
<td>Response</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AQ</td>
<td>The chart 5-3 on page 5-4 ought to include the census for each species to be removed.</td>
<td>This information has been added to Section 5.1.1 of the Final EA/EAW.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AR</td>
<td>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.</td>
<td>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</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AS</td>
<td>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.</td>
<td>See General Comment Response F(iii)</td>
</tr>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AT</td>
<td>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.</td>
<td>See General Comment Response B(iii)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AU</td>
<td>I can find no mention of the extra road length which would be necessary when calculating vehicle emissions.</td>
<td>The proposed action would lengthen 30th Street North by approximately one-quarter mile. This information has been added to Section 5.1.1 of the Final EA/EAW.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AV</td>
<td>‘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.’</td>
<td>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</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AW</td>
<td>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.</td>
<td>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</td>
</tr>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AX</td>
<td>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?</td>
<td>Deer are crepuscular (move and feed during twilight periods); however, deer observations by Airport staff generally occur during daytime maintenance activities.</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54AY</td>
<td>The noise discussion starts on page 5-16. Note first that MAC uses a different noise</td>
<td>See General Comment Response D.</td>
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<td>54AZ</td>
<td>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.</td>
<td>See General Comment Response D</td>
</tr>
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<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BA</td>
<td>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)?</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BB</td>
<td>MAC should show how the fleet has (or has not) changed over time.</td>
<td>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.</td>
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<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BC</td>
<td>Nowhere does MAC calibrate the tool with field observations and measurements, something easy to do and important to do but not done.</td>
<td>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.</td>
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<td>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</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BD</td>
<td>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.</td>
<td>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.  See also General Comment Response D.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BE</td>
<td>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!</td>
<td>As noted on Page 5-17, &quot;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.&quot;</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BF</td>
<td>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</td>
<td>As noted on Page 5-16 of the Draft EA/EAW, &quot;AEDT requires a variety of usersupplied data, including physical airfield facilities, aircraft activity, fleet mix, day-night split, runway use, and flight tracks&quot; to generate noise contours. These data inputs are presented in Appendix J of the Draft EA/EAW. Although all of these</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BG</td>
<td>‘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.</td>
<td>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.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BG</td>
<td>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.</td>
<td>The referenced statement on Page 5-21 reads &quot;lighting impacts from the MIRL and PAPI will likely be minimal given their location and steady illumination.&quot; 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.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BH</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BI</td>
<td>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</td>
<td>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</td>
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BJ</td>
<td>safe landing rather than worrying about reducing intensity of runway lighting.</td>
<td>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 a ensuring a safe landing often includes reducing the intensity of runway lighting before being situated on short final.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BK</td>
<td>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.</td>
<td>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</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BL</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BM</td>
<td>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.’</td>
<td>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. Planting trees is recommended by the U.S. EPA as potential green infrastructure for</td>
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Page 5-28 in the 2nd paragraph ahead of paragraph 5.14.3 there is a discussion of
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<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BN</td>
<td>planting trees. It seems trees are generally incompatible with airport operation.</td>
<td>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.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Vincent</td>
<td>Anderson</td>
<td>Email</td>
<td>54BO</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Stephen</td>
<td>Buckingham</td>
<td>Email</td>
<td>55A</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Stephen</td>
<td>Buckingham</td>
<td>Email</td>
<td>55B</td>
<td>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.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Stephen</td>
<td>Buckingham</td>
<td>Email</td>
<td>55C</td>
<td>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</td>
<td>See General Comment Response R</td>
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<tr>
<td>4/17/2018</td>
<td>Stephen</td>
<td>Buckingham</td>
<td>Email</td>
<td>55D</td>
<td>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.</td>
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<tr>
<td>4/17/2018</td>
<td>Stephen</td>
<td>Buckingham</td>
<td>Email</td>
<td>55E</td>
<td>MAC established the Community Engagement Panel (&quot;CEP&quot;) 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 &quot;Purpose and Need&quot; 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</td>
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See General Comment Response J(iii)

See General Comment Response I(i)
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<tr>
<td>4/17/2018</td>
<td>Stephen</td>
<td>Buckingham</td>
<td>Email</td>
<td>55F</td>
<td>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 &quot;Enhance safety of airport users and the general public&quot;.</td>
<td>See General Comment Response J(i)</td>
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<tr>
<td>4/17/2018</td>
<td>Stephen</td>
<td>Buckingham</td>
<td>Email</td>
<td>55G</td>
<td>number 2 under Purpose that stated &quot;Enhance safety of airport users and the general public&quot;. 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.</td>
<td>See General Comment Response B(i)</td>
</tr>
<tr>
<td>4/17/2018</td>
<td>Stephen</td>
<td>Buckingham</td>
<td>Email</td>
<td>55H</td>
<td>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</td>
<td>See General Comment Response I(i)</td>
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<td>4/18/2018</td>
<td>Cliff</td>
<td>Wells</td>
<td>Email</td>
<td>56A</td>
<td>compliment to how MAC has handled this matter but rather as a condemnation of how MAC has operated in the past.</td>
<td></td>
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<tr>
<td>4/18/2018</td>
<td>Cliff</td>
<td>Wells</td>
<td>Email</td>
<td>56B</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Cliff</td>
<td>Wells</td>
<td>Email</td>
<td>56C</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Cliff</td>
<td>Wells</td>
<td>Email</td>
<td>56D</td>
<td>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.</td>
<td>Comment noted.</td>
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<td>4/18/2018</td>
<td>Cliff</td>
<td>Wells</td>
<td>Email</td>
<td></td>
<td>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</td>
<td>See General Comment Response D</td>
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<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57A</td>
<td>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.</td>
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<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57B</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57C</td>
<td>the airport would have the potential of bringing larger aircrafts &amp; additional helicopters to this recreational airport.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57D</td>
<td>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.</td>
<td>See General Comment Response A(i)</td>
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<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57E</td>
<td>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?</td>
<td>See General Comment Response J(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57F</td>
<td>What about the potential loss of home value our home will be located in &quot;Zone A&quot;?</td>
<td>See General Comment Response K and S</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57G</td>
<td>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?</td>
<td>See General Comment Response M(ii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57H</td>
<td>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?</td>
<td>See General Comment Response L(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57I</td>
<td>I have concerns about the potential water runoffs from these runways that could potentially put chemicals in our wells. We are very concerned 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</td>
<td>See General Comment Response N</td>
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<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57I</td>
<td>contaminates won’t find their way into my well that so far is free of TCE?</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57J</td>
<td>Also since chemicals such as deicing, fuels, &amp; other cleaners are used at the airport now, &amp; 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?</td>
<td>See General Comment Response J(iii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57K</td>
<td>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 &amp; 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 subside their hobby or one’s flying business.</td>
<td>See General Comment Response C(i) and C(ii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57L</td>
<td>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.</td>
<td>See General Comment Response J(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57M</td>
<td>Why spend so much of our tax money on just a few pilots?</td>
<td>See General Comment Response C(i) and R</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Email</td>
<td>57F</td>
<td>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</td>
<td>See General Comment Response C(i) and R</td>
</tr>
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<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58A</td>
<td>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 condescension. [...] 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.</td>
<td>See General Comment Response I(iii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58B</td>
<td>It is reflected by the majority of the pilots' unprofessionism towards neighbors.</td>
<td>See General Comment Response Q</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58C</td>
<td>I have also witnessed MAC's behavior at Community Engagement Panel (&quot;CEP&quot;) meetings. When residents were allowed to ask questions Mead &amp; 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.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58D</td>
<td>When moved to 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.</td>
<td>See General Comment Response A(i), G and I(iii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58E</td>
<td>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</td>
<td>See General Comment Response R</td>
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<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58F</td>
<td>funds used on this expansion plan are also my taxpayer money.</td>
<td>See General Comment Response F(iv)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58G</td>
<td>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.</td>
<td>See General Comment Response C(i) and C(ii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58H</td>
<td>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.</td>
<td>See General Comment Response B(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58I</td>
<td>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.</td>
<td>See General Comment Response B(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58J</td>
<td>MAC should keep its Expansion within its current fenced footprint.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>58G</td>
<td>PS. I expect a personal written reply from MAC.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59A</td>
<td>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.</td>
<td>See General Comment Response C(iii)</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59B</td>
<td>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.</td>
<td>See General Comment Response H</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59C</td>
<td>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 [to follow through with this plan]</td>
<td>See General Comment Response F</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59D</td>
<td>There must be planes that are safe to use on the current runway lengths, or there would be no airport, period.</td>
<td>See General Comment Response P</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59E</td>
<td>There must be planes that are safe to use on the current runway lengths, or there would be no airport, period.</td>
<td>See General Comment Response P</td>
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See General Comment Response J(i) and R
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59F</td>
<td>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.</td>
<td>See General Comment Response C(iii), J(i), J(iv), and R</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59G</td>
<td>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 invited 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</td>
<td>See General Comment Response I(i)</td>
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<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59H</td>
<td>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.</td>
<td>See General Comment Response J(i)</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59I</td>
<td>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</td>
<td>See General Comment Response F(v)</td>
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<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59J</td>
<td>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?</td>
<td>See General Comment Response J(i)</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59K</td>
<td>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.</td>
<td>See General Comment Response O(i)</td>
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<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59L</td>
<td>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 in-creased usage of this airport to keep it sustainable and viable, yet they claim this is not the case.</td>
<td>See General Comment Response A(i)</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59M</td>
<td>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.</td>
<td>See General Comment Response J(iv)</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59N</td>
<td>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.</td>
<td>See General Comment Response C(i)</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59O</td>
<td>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</td>
<td>See General Comment Response I(i)</td>
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<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59P</td>
<td>for newly licensed pilots to practice and hone their skills.</td>
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<td>I also know for a fact that not all pilots agree with the view that</td>
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<td>extending runway length will make it safer for all because an increase</td>
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<td>in air traffic and variance of aircraft using the runways will cause</td>
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<td>other safety issues.</td>
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<td>Comment noted.</td>
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<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59Q</td>
<td>My husband has owned our 5 acre property on the corner of 30th Street</td>
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<td>and Neal Avenue since around 1994. When he purchased here, he saw the</td>
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<td>Lake Elmo Airport as an asset to the area. He asked about the future</td>
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<td>of the airport, and was told unequivocally that it would stay within</td>
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<td>the currently occupied space. We were married in 1999, and as our</td>
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<td>family grew, we looked into moving but ultimately decided to build a</td>
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<td>new larger home on the same property. Before building, we once again</td>
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<td>inquired with city planners regarding the airport before making another</td>
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<td>significant financial investment. Since then, the perimeter fencing</td>
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<td>was installed surrounding the airport, which seemed to solidify the</td>
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<td>communications. Then in July of 2015, what seems out of nowhere and</td>
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<td>completely by happenstance, we heard of this LCTP expansion/improvement</td>
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<td>proposal in which not only would the airport and runways expand, but</td>
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<td>the road we travel on multiple times each day would be significantly</td>
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<td>altered to accommodate that improvement.</td>
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<td>See General Comment Response I(iii)</td>
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<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59R</td>
<td>In lieu of utilizing the new hairpin curve on 30th Street, the traffic</td>
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<td>will likely be thwarted onto thoroughfares in the adjacent neighborhoods</td>
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<td>which were not built to accommodate such high usage.</td>
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<td>Given the lack of alternate direct routes from west to east and vice</td>
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<td>versa, the MAC does not expect that the additional 46 seconds of travel</td>
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<td>time required to use the realigned segment of 30th Street will have</td>
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<td>a significant impact on local travel route choices.</td>
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<td>See General Comment Response B</td>
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<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59S</td>
<td>The rural view of trees and wildlife will be cleared to facilitate a</td>
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<td>new runway.</td>
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<td>See General Comment Response M(i)</td>
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<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59T</td>
<td>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.</td>
<td>See General Comment Response M(ii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59U</td>
<td>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.</td>
<td>See General Comment Response K</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59V</td>
<td>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.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Lori</td>
<td>Gergen</td>
<td>Email</td>
<td>59W</td>
<td>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?</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>John</td>
<td>Regenold Jr</td>
<td>Email</td>
<td>60A</td>
<td>Let me first start off by saying that I am in support of the runway expansion at Lake Elmo.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>John</td>
<td>Regenold Jr</td>
<td>Email</td>
<td>60B</td>
<td>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</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61A</td>
<td>Why has FAA allowed MAC to lease acreage for agricultural use on properties it owns and operates as an airport in Lake Elmo?</td>
<td>See General Comment Response F(i)</td>
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<td>Date</td>
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<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61B</td>
<td>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.</td>
<td>See General Comment Response H</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61C</td>
<td>Your 1965 expansion plan has expired and you've abandoned the plan previously.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61D</td>
<td>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.</td>
<td>See General Comment Response B and K</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61E</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61F</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61G</td>
<td>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?</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61H</td>
<td>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?</td>
<td>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.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Elizabeth</td>
<td>Buckingham</td>
<td>Email</td>
<td>61I</td>
<td>PS. I expect a personal written reply from MAC.</td>
<td>See General Comment Response U</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>John</td>
<td>Regenold</td>
<td>Email</td>
<td>62A</td>
<td>I just wanted to send off a note to let you know how important Lake Elmo Airport is to me &amp; our family. We have been flying out of Lake Elmo since the late 1960s &amp; supported the FBOs family business. Our family has a hangar on the field &amp; we support EAA &amp; Fly Young Eagles.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>John</td>
<td>Regenold</td>
<td>Email</td>
<td>62B</td>
<td>Safety is always a concern and runway expansion would be very welcomed and a great improvement for pilots and surrounding community</td>
<td>Comment noted.</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63A</td>
<td>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 in which the airport would have the potential of bringing larger aircraft &amp; the flight path closer to our home.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63B</td>
<td>This airport has been perceived and used as a recreational airport for the past 31 years that we have lived in West Lakeland.</td>
<td>See General Comment Response A(ii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63C</td>
<td>The MAC representatives have said they do not monitor what nor do they control what flies in or out of the airport.</td>
<td>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</td>
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</table>
about noise programs, view airport operations, or file noise complaints, please visit 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.

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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63D</td>
<td>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?</td>
<td>See General Comment Response F(ii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63E</td>
<td>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?</td>
<td>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</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63F</td>
<td>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?</td>
<td>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: - 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 - Reducing the proposed length of Lake Elmo’s primary runway from ...</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63G</td>
<td>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?</td>
<td>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.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63H</td>
<td>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?</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63I</td>
<td>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.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63J</td>
<td>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.</td>
<td>See General Comment Response P</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63K</td>
<td>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 today as a major township road for commuting to and from work every day?</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63L</td>
<td>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?</td>
<td>See General Comment Response F(iii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63M</td>
<td>MAC needs to provide a detailed cost analysis of each alternative in detail, the claim is cost to airport residents is substantial, how much?</td>
<td>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.</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63N</td>
<td>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?</td>
<td>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.</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63O</td>
<td>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</td>
<td>Because Lake Elmo Airport performs a critical function within the MAC reliever airport system and FAA National Plan of Integrated Airport Systems (NPIAS),</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63P</td>
<td>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.</td>
<td>See General Comment Response I(i) and I(iii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63Q</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63R</td>
<td>The transient users are helicopters from downtown 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.</td>
<td>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.</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63S</td>
<td>MAC has a noise complaint web site but you have never provided statics on how many each quarter the MAC reports the number of aircraft noise complaints, locations filing</td>
<td>Each quarter the MAC reports the number of aircraft noise complaints, locations filing</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63T</td>
<td>complaints or done the research to see who is creating the noise, why is this?</td>
<td>an aircraft noise compliant, 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</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63U</td>
<td>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.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63V</td>
<td>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.</td>
<td>See General Comment Response H</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63W</td>
<td>Rebuild the existing runways if needed</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63X</td>
<td>Remove helicopter support</td>
<td>See response to comment 63R above</td>
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<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63Y</td>
<td>Keep the trees to minimize the light pollution</td>
<td>See General Comment Response M(ii)</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63Z</td>
<td>Solid fence that is proposed is just a bad eye sore.</td>
<td>See General Comment Response E</td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63Z</td>
<td>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</td>
<td>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</td>
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<td>Date</td>
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<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63AA</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>4/18/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Email</td>
<td>63AB</td>
<td>MAC should return this airport to MnDOT for management where it can be maintained and follow state rules.</td>
<td>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)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Lynette</td>
<td>Spitzer</td>
<td>Email</td>
<td>64A</td>
<td>Opposed to project because of encroachment of runways onto 30th Street and Manning Avenue.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Lynette</td>
<td>Spitzer</td>
<td>Email</td>
<td>64B</td>
<td>Opposed to project because of rerouting and/or possible vacating of 30th Street</td>
<td>See General Comment Response B</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Lynette</td>
<td>Spitzer</td>
<td>Email</td>
<td>64C</td>
<td>Opposed to project because of loss of trees and natural habitat</td>
<td>See General Comment Response L(i) and M(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Lynette</td>
<td>Spitzer</td>
<td>Email</td>
<td>64D</td>
<td>Opposed to project because of added noise and/or noise pollution</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>Date</td>
<td>First Name</td>
<td>Last Name</td>
<td>Source</td>
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<tr>
<td>4/19/2018</td>
<td>Lynette</td>
<td>Spitzer</td>
<td>Email</td>
<td>64E</td>
<td>more noise and light pollution forcing development of a new noise and light abatement policy</td>
<td>See General Comment Response D and E</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Lynette</td>
<td>Spitzer</td>
<td>Email</td>
<td>64F</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamra</td>
<td>Roth</td>
<td>Email</td>
<td>65A</td>
<td>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.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamra</td>
<td>Roth</td>
<td>Email</td>
<td>65B</td>
<td>Other family members and I live on the remaining West Lakeland Township property and we are totally opposed to any airport expansion.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamra</td>
<td>Roth</td>
<td>Email</td>
<td>65C</td>
<td>The rerouting of 30th Street North will adversely devalue our properties, directly affect my business and endanger our safety.</td>
<td>See General Comment Response B</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamra</td>
<td>Roth</td>
<td>Email</td>
<td>65D</td>
<td>Only rebuild the existing runways within the current fenced footprint.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Email</td>
<td>66A</td>
<td>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?</td>
<td>See General Comment Response F(ii)</td>
</tr>
</tbody>
</table>

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.
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<th>Date</th>
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<th>Source</th>
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<th>Response</th>
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</thead>
<tbody>
<tr>
<td>4/19/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Email</td>
<td>66B</td>
<td>Continue to feel the expansion is incorrect for a number of reasons</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jim</td>
<td>V</td>
<td>Email</td>
<td>67A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jim</td>
<td>V</td>
<td>Email</td>
<td>67B</td>
<td>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 &quot;runt&quot; 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 &quot;gifted&quot; power of eminent domain to keep homes, businesses, cars and trains out of their safety zones.</td>
<td>See General Comment Response H</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jim</td>
<td>V</td>
<td>Email</td>
<td>67C</td>
<td>MAC staff and pilots frequently ask residents, &quot;Did you know the airport was there when you built or bought your home?&quot; Residents would ask, &quot;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.</td>
<td>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)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jim</td>
<td>V</td>
<td>Email</td>
<td>67D</td>
<td>Request that the no-action option be adopted</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jim</td>
<td>V</td>
<td>Email</td>
<td>67E</td>
<td>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 &quot;No Action&quot; option be adopted and future plans for development of this airport be suppressed permanently. This airport can and will accommodate all single</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>Date</td>
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<tr>
<td>4/19/2018</td>
<td>Jodie</td>
<td>Ballis</td>
<td>Email</td>
<td>68A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jodie</td>
<td>Ballis</td>
<td>Email</td>
<td>68B</td>
<td>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.</td>
<td>See General Comment Response K</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jodie</td>
<td>Ballis</td>
<td>Email</td>
<td>68C</td>
<td>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.</td>
<td>See General Comment Response S</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jodie</td>
<td>Ballis</td>
<td>Email</td>
<td>68D</td>
<td>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.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jodie</td>
<td>Ballis</td>
<td>Email</td>
<td>68E</td>
<td>I am requesting that you acknowledge my comment and concerns regarding the MAC'S 2035 LTCP Revised Plan B.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Jodie</td>
<td>Ballis</td>
<td>Email</td>
<td>68F</td>
<td>I would also request that the &quot;No Action&quot; 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.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Troy</td>
<td>Ballis</td>
<td>Email</td>
<td>69A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>Date</td>
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<tr>
<td>4/19/2018</td>
<td>Troy</td>
<td>Ballis</td>
<td>Email</td>
<td>69B</td>
<td>If the MAC proceeds with their Revised Plan B for Lake Elmo airport, longer runways will mean larger planes.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Troy</td>
<td>Ballis</td>
<td>Email</td>
<td>69C</td>
<td>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.</td>
<td>See General Comment Response P</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Troy</td>
<td>Ballis</td>
<td>Email</td>
<td>69D</td>
<td>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.</td>
<td>See General Comment Response C(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Troy</td>
<td>Ballis</td>
<td>Email</td>
<td>69E</td>
<td>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, &quot;don't fly into an airport that can't support your plane or that you're not comfortable flying into&quot;. 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.</td>
<td>See General Comment Response C</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Troy</td>
<td>Ballis</td>
<td>Email</td>
<td>69F</td>
<td>I think it's time that the MAC &quot;No Action&quot; option be adopted as the only option for Lake Elmo airport, allowing the MAC to improve the runways at their existing lengths and locations.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Kate</td>
<td>Kopp</td>
<td>Email</td>
<td>70A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Kate</td>
<td>Kopp</td>
<td>Email</td>
<td>70B</td>
<td>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</td>
<td>See General Comment Response N</td>
</tr>
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<td><strong>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?</strong></td>
<td></td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Kate</td>
<td>Kopp</td>
<td>Email</td>
<td>70C</td>
<td>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 &quot;No Action&quot; 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.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>T</td>
<td></td>
<td>Email</td>
<td>71A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>T</td>
<td></td>
<td>Email</td>
<td>71B</td>
<td>The President's report dated May 16, 1952 states that and airport is to have a clear zone of 1000 feet wide by % 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</td>
<td>See General Comment Response F and G</td>
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<tr>
<td>4/19/2018</td>
<td>T</td>
<td></td>
<td>Email</td>
<td>71C</td>
<td>Please acknowledge my comment and concerns and revert to the &quot;No Action&quot; option for Lake Elmo airport.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ash</td>
<td>Sch</td>
<td>Email</td>
<td>72A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ash</td>
<td>Sch</td>
<td>Email</td>
<td>72B</td>
<td>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.)</td>
<td>See General Comment Response M(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ash</td>
<td>Sch</td>
<td>Email</td>
<td>72C</td>
<td>Larger, louder planes, with no natural buffers in place will change the footprint of our communities.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ash</td>
<td>Sch</td>
<td>Email</td>
<td>72D</td>
<td>We purchased our homes in a rural area to be away from the lights and noise of the city.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ash</td>
<td>Sch</td>
<td>Email</td>
<td>72E</td>
<td>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.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ash</td>
<td>Sch</td>
<td>Email</td>
<td>72F</td>
<td>This expansion doesn't make sense for this airport. It only hurts our home values, natural resources, and peace of mind.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ash</td>
<td>Sch</td>
<td>Email</td>
<td>72G</td>
<td>Please acknowledge my comment and concerns and revert to the &quot;No Action&quot; option for Lake Elmo airport.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Wendy</td>
<td>Modrynski</td>
<td>Email</td>
<td>73A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Wendy</td>
<td>Modrynski</td>
<td>Email</td>
<td>73B</td>
<td>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</td>
<td>See General Comment Response F(iii)</td>
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<tr>
<td>4/19/2018</td>
<td>Wendy</td>
<td>Modrynski</td>
<td>Email</td>
<td>73C</td>
<td>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.</td>
<td>See General Comment Response A(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74A</td>
<td>I am opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74B</td>
<td>The proposed expansion will disrupt 30th Street</td>
<td>See General Comment Response B(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74C</td>
<td>[will disrupt] the land that is contaminated with TCE which will affect our wells</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74D</td>
<td>[will affect] natural habitat, both plant and wildlife depend on that property to survive.</td>
<td>See General Comment Response L(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74E</td>
<td>It will bring in noise</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74F</td>
<td>larger planes that, even with longer runways will struggle to take off and land here.</td>
<td>See General Comment Response A(i) and P</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74H</td>
<td>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.</td>
<td>See General Comment Response C</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74I</td>
<td>We chose to live near this airport because we enjoy single engine propeller driven planes.</td>
<td>See General Comment Response A(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74J</td>
<td>What we don't need is this kind of disruption in our long time settled communities.</td>
<td>See General Comment Response G</td>
</tr>
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<tr>
<td>4/19/2018</td>
<td>Tamara</td>
<td>Larson</td>
<td>Email</td>
<td>74K</td>
<td>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.</td>
<td>See General Comment Response C(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Kayla?</td>
<td>W?</td>
<td>Email</td>
<td>75A</td>
<td>Opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Kayla?</td>
<td>W?</td>
<td>Email</td>
<td>75B</td>
<td>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.</td>
<td>See General Comment Response M(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Kayla?</td>
<td>W?</td>
<td>Email</td>
<td>75C</td>
<td>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.</td>
<td>See General Comment Response L(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Kayla?</td>
<td>W?</td>
<td>Email</td>
<td>75D</td>
<td>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.</td>
<td>See General Comment Response L(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Kayla?</td>
<td>W?</td>
<td>Email</td>
<td>75E</td>
<td>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.</td>
<td>See General Comment Response C(iii)</td>
</tr>
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<td>Date</td>
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<tr>
<td>4/19/2018</td>
<td>Marybeth</td>
<td>Carl</td>
<td>Email</td>
<td>76A</td>
<td>Opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marybeth</td>
<td>Carl</td>
<td>Email</td>
<td>76B</td>
<td>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.</td>
<td>See General Comment Response C(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marybeth</td>
<td>Carl</td>
<td>Email</td>
<td>76C</td>
<td>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.</td>
<td>See General Comment Response C</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marybeth</td>
<td>Carl</td>
<td>Email</td>
<td>76D</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>4/19/2018</td>
<td>Tom</td>
<td>F</td>
<td>Email</td>
<td>77A</td>
<td>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.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Tom</td>
<td>F</td>
<td>Email</td>
<td>77B</td>
<td>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...</td>
<td>See General Comment Response F(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Todd?</td>
<td>Mc?</td>
<td>Email</td>
<td>77C</td>
<td>building a new 30th street with a hairpin curve thus creating obstacles not presently existing</td>
<td>See General Comment Response B(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Todd?</td>
<td>Mc?</td>
<td>Email</td>
<td>78A</td>
<td>Opposed to runway expansion at Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Todd?</td>
<td>Mc?</td>
<td>Email</td>
<td>78B</td>
<td>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</td>
<td>See General Comment Response B(i)</td>
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<tr>
<td>4/19/2018</td>
<td>Todd?</td>
<td>Mc?</td>
<td>Email</td>
<td>78C</td>
<td>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.</td>
<td>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</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Todd?</td>
<td>Mc?</td>
<td>Email</td>
<td>78D</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Patrick</td>
<td>Fleming</td>
<td>Email</td>
<td>79A</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Patrick</td>
<td>Fleming</td>
<td>Email</td>
<td>79B</td>
<td>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.</td>
<td>See General Comment Response C(v)</td>
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<td>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</td>
<td>Comment noted.</td>
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<tr>
<td>4/19/2018</td>
<td>Patrick</td>
<td>Fleming</td>
<td>Email</td>
<td>79C</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Patrick</td>
<td>Fleming</td>
<td>Email</td>
<td>79D</td>
<td>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 &quot;brought up to code&quot;. 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.</td>
<td>This comment is not accurate. The project is being proposed for the reasons stated in Chapter 2, Purpose and Need, and for no other reason.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Patrick</td>
<td>Fleming</td>
<td>Email</td>
<td>79E</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80A</td>
<td>Opposed to any runway expansion/improvements at Lake Elmo Airport</td>
<td>Comment noted.</td>
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<td>Date</td>
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<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80B</td>
<td>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.</td>
<td>See General Comment Response B(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80C</td>
<td>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.</td>
<td>See General Comment Responses O(i) and O(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80D</td>
<td>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</td>
<td>See General Comment Response O(i)</td>
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<td>See 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.</td>
<td>See General Comment Response O(i)</td>
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<td>80E</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80E</td>
<td>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’.</td>
<td>See General Comment Response P</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80F</td>
<td>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 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.</td>
<td>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.</td>
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<td>Date</td>
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<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80G</td>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80H</td>
<td><em>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.</em> 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.</td>
<td>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.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80I</td>
<td>Mead &amp; 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.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80J</td>
<td>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</td>
<td>See General Comment Response J(iv)</td>
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<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80K</td>
<td>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.</td>
<td>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.”</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80L</td>
<td>30th Street was recently upgraded to a major contributing artery road in Washington County.</td>
<td>The MAC decided solely on this plan and has absolutely refused to acknowledge that the airport over time has become land-locked.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80M</td>
<td>The MAC decided solely on this plan and has absolutely refused to acknowledge that the airport over time has become land-locked.</td>
<td>The MAC decided solely on this plan and has absolutely refused to acknowledge that the airport over time has become land-locked.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Mary</td>
<td>Vierling</td>
<td>Email</td>
<td>80N</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Michael</td>
<td>Seeber</td>
<td>Email</td>
<td>81A</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>4/19/2018</td>
<td>Michael</td>
<td>Seeber</td>
<td>Email</td>
<td>81B</td>
<td>public comment meeting they stated this is not and 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.</td>
<td>See General Comment Response J(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Michael</td>
<td>Seeber</td>
<td>Email</td>
<td>81C</td>
<td>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.</td>
<td>See General Comment Response I(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Michael</td>
<td>Seeber</td>
<td>Email</td>
<td>81D</td>
<td>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.</td>
<td>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</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Michael</td>
<td>Seeber</td>
<td>Email</td>
<td>81E</td>
<td>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.</td>
<td>See General Comment Response B(i)</td>
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<tr>
<td>4/19/2018</td>
<td>Michael</td>
<td>Seeber</td>
<td>Email</td>
<td>81F</td>
<td>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.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Michael</td>
<td>Seeber</td>
<td>Email</td>
<td>81G</td>
<td>A better use of this “free” money will be the New Richmond airport which needs and wants the growth and is better situated.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Michael</td>
<td>Seeber</td>
<td>Email</td>
<td>81H</td>
<td>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.</td>
<td>See General Comment Response J(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ann</td>
<td>Burchuck</td>
<td>Email</td>
<td>82A</td>
<td>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?</td>
<td>See General Comment Response F(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Madeleine</td>
<td>Fleming</td>
<td>Email</td>
<td>83A</td>
<td>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</td>
<td>Comment noted.</td>
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<tr>
<td>Date</td>
<td>First Name</td>
<td>Last Name</td>
<td>Source</td>
<td>Comment ID</td>
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<tr>
<td>4/19/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Email</td>
<td>84A</td>
<td>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.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Ann</td>
<td>Bucheck</td>
<td>Email</td>
<td>84B</td>
<td>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?</td>
<td></td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85A</td>
<td>I continue to feel this airport expansion is incorrect for a number of reasons</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85A</td>
<td>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</td>
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<td>Date</td>
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<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85B</td>
<td>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.</td>
<td>See General Comment Response H</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85C</td>
<td>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.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85D</td>
<td>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.</td>
<td>See General Comment Response F(iv)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85E</td>
<td>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</td>
<td>See General Comment Response B(i)</td>
</tr>
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<td>Date</td>
<td>First Name</td>
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<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85F</td>
<td>beginning an expansion plan, and this was ignored or minimized by M.A.C &quot;hired gun.</td>
<td>See General Comment Response J(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85G</td>
<td>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 &quot;WANT&quot; TO MAKE ONLY TO GET THE FEDERAL MONEY.) THE AIRPORT MAY NEED RESURFACING, BUT THERE IS NOTHING ELSE NEEDED.</td>
<td>See General Comment Response O(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85H</td>
<td>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.</td>
<td>See General Comment Response J(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85I</td>
<td>THE EXPANSION IS A MONEY GRAB FOR FEDERAL MONEY THAT IS UNWARRANTED.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85J</td>
<td>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.</td>
<td>See General Comment Response J(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85K</td>
<td>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.</td>
<td>See General Comment Response C(iii)</td>
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<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85L</td>
<td>UNWARRANTED EXPANSION of this airport.</td>
<td>See General Comment Response I(i)</td>
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<td>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 &quot;tell&quot; us what &quot;they&quot; are &quot;doing.&quot; 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 they do any actual public purpose for this.</td>
<td></td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Molly</td>
<td>Olson</td>
<td>Email</td>
<td>85M</td>
<td>Please stop this expansion</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86A</td>
<td>Opposed to the current plans for runway expansion at the Lake Elmo Airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86B</td>
<td>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.</td>
<td>See General Comment Response J(ii) and R</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86C</td>
<td>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.</td>
<td>The Lake Elmo Airport does not have a waiver related to any FAA standards.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86D</td>
<td>The management of the Lake Elmo airport, and MAC, are using part of an outdated expansion plan</td>
<td>See General Comment Response H</td>
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<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86E</td>
<td>Plan does not accommodate the residential communities that have grown around it over the decades.</td>
<td>See General Comment Response F(iv)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86F</td>
<td>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.</td>
<td>See General Comment Response I(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86G</td>
<td>Their quality of life and property values will decline because of this expansion.</td>
<td>See General Comment Response K</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86H</td>
<td>If this was a governmental eminent domain issue, based off of a &quot;good of the community&quot;, 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.</td>
<td>See General Comment Response I(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86I</td>
<td>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.</td>
<td>See General Comment Response F(iii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86J</td>
<td>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.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Hans</td>
<td>Spitzer</td>
<td>Email</td>
<td>86K</td>
<td>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.</td>
<td>See General Comment Response C(iii)</td>
</tr>
</tbody>
</table>
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.
<table>
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<th>Date</th>
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<th>Comment ID</th>
<th>Comment</th>
<th>Response</th>
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</thead>
<tbody>
<tr>
<td>4/19/2018</td>
<td>Robert</td>
<td>Lupelow</td>
<td>Email</td>
<td>87A</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Robert</td>
<td>Lupelow</td>
<td>Email</td>
<td>87B</td>
<td>21D is as it has been for many years prior to my business and personal flights a viable and necessary location.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Robert</td>
<td>Lupelow</td>
<td>Email</td>
<td>87C</td>
<td>As to others opinions per Krnh being a reasonable replacement, I strongly disagree. I would probably relocate to Kane instead.</td>
<td>See General Comment Response C</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88A</td>
<td>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.</td>
<td>See General Comment Response T</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88B</td>
<td>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.</td>
<td>See General Comment Response B</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88C</td>
<td>Regarding the removal if 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.</td>
<td>See General Comment Responses E &amp; M</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88D</td>
<td>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.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88E</td>
<td>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.</td>
<td>See General Comment Response J</td>
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<td>Date</td>
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<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88F</td>
<td>The projections of the number of operations and the number of planes at the airport between the 2008 &amp; 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.</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88G</td>
<td>The regional airports are all underutilized as stated in a recent article in the Pioneer Press so expansion does not seem prudent</td>
<td>See General Comment Response C</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88H</td>
<td>Other airports can accommodate the larger planes which need the longer runways</td>
<td>See General Comment Response C</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88I</td>
<td>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</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88J</td>
<td>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.</td>
<td>See General Comment Response G</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88K</td>
<td>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</td>
<td>See General Comment Response I</td>
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<td>municipalities have voiced their objections to this plan and the state officials representing the community have spoken against the plan.</td>
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<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88L</td>
<td>A number of disrespectful comments were addressed to the community members by the Commissioners and MAC personnel. This does not build good relationships.</td>
<td>See General Comment Response I</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88M</td>
<td>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.</td>
<td>See General Comment Response J(ii)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88N</td>
<td>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.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/19/2018</td>
<td>Marian</td>
<td>Appelt</td>
<td>Email</td>
<td>88O</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89A</td>
<td>fully support MAC’s recommendation to relocate and extend runway 14/32 at the Lake Elmo airport</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89B</td>
<td>Some speakers at the public hearing were concerned that MAC doesn't listen to</td>
<td>Comment noted.</td>
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<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89C</td>
<td>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.</td>
<td></td>
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<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89D</td>
<td>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.).</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89E</td>
<td>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.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89D</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89F</td>
<td>benefitting both the pilot and nearby residents.</td>
<td>See General Comment Response D</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89G</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89H</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89I</td>
<td>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 ‘t help much.)</td>
<td>See General Comment Response B(ii)</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89J</td>
<td>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.</td>
<td>Comment noted.</td>
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<td>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</td>
<td>Comment noted.</td>
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<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89K</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89L</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89M</td>
<td>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.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/20/2018</td>
<td>John</td>
<td>Krack</td>
<td>Email</td>
<td>89N</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>4/21/2018</td>
<td>Mark</td>
<td>Werner</td>
<td>Email</td>
<td>90A</td>
<td>I want to add my support for the airport expansion.</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>4/21/2018</td>
<td>Mark</td>
<td>Werner</td>
<td>Email</td>
<td>90B</td>
<td>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.</td>
<td>Alternative 1 was the original preferred alternative for realigning 30th 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 30th Street North and Neal.</td>
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<tr>
<td>4/23/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Mail</td>
<td>91A</td>
<td>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 the runways at the airport.</td>
<td>Comment noted</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Mail</td>
<td>91B</td>
<td>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.</td>
<td>See General Comment Response S</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Mail</td>
<td>91C</td>
<td>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?</td>
<td>See General Comment Response M(ii)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Mail</td>
<td>91D</td>
<td>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.</td>
<td>See General Comment Response L(i)</td>
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<tr>
<td>4/23/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Mail</td>
<td>91E</td>
<td>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 &amp; other cleaners are used at the airport now &amp; 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?</td>
<td>See General Comment Response N</td>
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<tr>
<td>4/23/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Mail</td>
<td>91F</td>
<td>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 &amp; 30th 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 subside their hobby or one’s flying business.</td>
<td>See General Comment Response J(iii)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Mail</td>
<td>91G</td>
<td>If they don’t feel safe landing their airplane at Lake Elmo Airport there are other airports within 20 miles.</td>
<td>See General Comment Response C</td>
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<tr>
<td>4/23/2018</td>
<td>Denise</td>
<td>Cornell</td>
<td>Mail</td>
<td>91H</td>
<td>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.</td>
<td>See General Comment Response C(i)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92A</td>
<td>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 30th 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 &amp; the flight path closer to our home.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92B</td>
<td>This airport has been perceived and used as a recreational airport for the past 31 years that we have lived in West Lakeland.</td>
<td>See General Comment Response A(ii)</td>
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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 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 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 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
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<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92D</td>
<td>We have asked MAC over the past 30 years many questions and always got vague answers to simple questions like the ones listed below: 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.</td>
<td>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</td>
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<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92E</td>
<td>2. Why is it that MAC never attended any planning meetings or public hearings when land around the airport was being developed?</td>
<td>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</td>
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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.
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| 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? | 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:     
- 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.
- Reducing the proposed length of Lake Elmo’s primary runway from 3,600’ to 3,500’ – still one of the
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<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92G</td>
<td>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?</td>
<td>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.</td>
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<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92H</td>
<td>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?</td>
<td>See General Comment Response J(iv)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92I</td>
<td>6. Where is the data to prove the statement that larger aircraft won’t come to the Lake Elmo Airport after completion?</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92J</td>
<td>7. Why is it that MAC does not have data to support larger aircraft won’t come to this airport?</td>
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<td>7a. Mac should have data to support once the airport runway is lengthened, larger aircraft will come to Lake Elmo where is this study?</td>
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<td>8. How can MAC claim the longer runway is needed for safety of the existing users of the Lake Elmo Airport?</td>
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<td>8a. If it’s not safe for the pilots now aren’t they in danger of personal injury now?</td>
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<td>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?</td>
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<td>8c. Isn’t it the pilots’ responsibility to themselves and others to fly safely?</td>
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<td>See General Comment Response P</td>
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<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92K</td>
<td>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? \n9. How can MAC put over 1500 users of 30th 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?</td>
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<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92L</td>
<td>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?</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92M</td>
<td>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.</td>
<td>See General Comment Response F(iii)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92M</td>
<td>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?</td>
<td>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.</td>
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<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92N</td>
<td>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?</td>
<td>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.</td>
</tr>
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</table>
| 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. |
| 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 |

Lake Elmo Airport does not have an officially designated helipad facility but is
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<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92S</td>
<td>with no regard to neighbors and MAC does nothing about it.</td>
<td>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.</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92S</td>
<td>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?</td>
<td>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/releases.html">https://www.macenvironment.org/reports/releases.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.</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92T</td>
<td>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.</td>
<td>See General Comment Response A(i)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92U</td>
<td>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.</td>
<td>See General Comment Response H</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92V</td>
<td>Rebuilding the existing runways if needed</td>
<td>See General Comment Response C(iii)</td>
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<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92W</td>
<td>but remove the onsite helicopter support,</td>
<td>See response to Comment 92R above.</td>
</tr>
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<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92X</td>
<td>keep the trees to minimize the light and noise pollution,</td>
<td>See General Comment Response M(ii)</td>
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<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92Y</td>
<td>a solid fence that is proposed is just a bad eye sore.</td>
<td>See General Comment Response E</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92Z</td>
<td>MAC does not even maintain the existing chain link fence installed post 911; one look at it along 30th 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</td>
<td>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.</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92AA</td>
<td>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.</td>
<td>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)</td>
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<td>4/23/2018</td>
<td>Brad</td>
<td>Cornell</td>
<td>Mail</td>
<td>92AB</td>
<td>MAC should return this airport to MnDOT for management where it can be maintained and follow state rules.</td>
<td>MnDOT does not typically own or manage individual airports.</td>
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<tr>
<td>4/23/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Mail</td>
<td>93A</td>
<td>I am opposed to any expansion at the Lake Elmo Airport.</td>
<td>Comment noted</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Mail</td>
<td>93B</td>
<td>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.</td>
<td>See General Comment Response N</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Mail</td>
<td>93C</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>4/23/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Mail</td>
<td>93D</td>
<td>Also, I have always been confused by how the purpose and need of the MAC (unelected officials) is more important that the neighboring municipalities and their elected officials. Our elected officials represent many more people than the small number of pilots at the airport.</td>
<td>See General Comment Response I(ii)</td>
</tr>
<tr>
<td>4/23/2018</td>
<td>Laura</td>
<td>Kaschmitter</td>
<td>Mail</td>
<td>93E</td>
<td>Please re-consider this plan and repair the runway in its current position.</td>
<td>See General Comment Response C(iii)</td>
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AFFIDAVIT OF PUBLICATION

STATE OF MINNESOTA  
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: Darlene MacPherson
Designated Agent

Subscribed and sworn to or affirmed before me on 03/02/2018 by Darlene MacPherson.

Rate Information:
(1) Lowest classified rate paid by commercial users for comparable space:
$40.00 per column inch

Ad ID 788027
Affidavit of Publication

State of Minnesota

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 7TH 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:

*ABCDEFGHJKLMNOPQRSTUVWXYZ
*abcdefgijklmnopqrstuvwxyz
*aabcdefghijklmnopqrstuvwxyz

Subscribed and sworn to before me on this 7TH 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
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 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

Petitions

The following petition has been filed with the EQB requesting preparation of an Environmental Assessment Worksheet (FAW). 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
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](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@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

**Responsible Governmental Unit (RGU): Metropolitan Airports Commission**

**RGU Contact Person:**
Chad Lecve
Director of Environment
6040 28th Avenue South
Minneapolis, MN 55450
612-725-6326
chad.lecve@mspmac.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
Official Notices

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@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

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:

# MEETING ATTENDANCE SHEET

By filling this in, you acknowledge that this is public information and may be included in a public document.

<table>
<thead>
<tr>
<th>NAME</th>
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<tr>
<td>MARY VIERLING</td>
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<td>RICK WEYRAUCH</td>
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<td>Jonathan Schmeiz</td>
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<td>John Klack</td>
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<td>7619 LAKEVIEW RD NE</td>
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<td>Lowell Johnson</td>
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<td>Mark Montanari</td>
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<td>Dave Schultz</td>
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<td>Jennie Van Raust</td>
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<td>Kris Van Raust</td>
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Wednesday April 4, 2018 Public Hearing
Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet
Oak-Land Middle School Auditorium
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<td>Wes Morgan</td>
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<td>Daniel Kelle</td>
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<tr>
<td>Troy Wencel</td>
<td>Woodbury</td>
<td>3511 Cressmore Pt.</td>
<td>21D Pilots</td>
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<tr>
<td>Lynne Peilt</td>
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<td>Laura Kaschmitter</td>
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<td>Mick Kaschmitter</td>
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<td>Ron Fredkove</td>
<td>Baytown</td>
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<td>John J. Regenho</td>
<td>St. Paul</td>
<td>5750 W. Ryan Ave, Roseville, MN 55113</td>
<td>Airport User, Hangar Owner, EAA Member</td>
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<tr>
<td>Keith Finkman</td>
<td>Lake Elmo</td>
<td>5833 Lake Elmo Ave, 55112</td>
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<tr>
<td>Rod Oquist</td>
<td>Woodbury</td>
<td>212 1 Woodbury Ave, MN 55129</td>
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<td>Mirm Groovy</td>
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<tr>
<td>Greg Adler</td>
<td>Altoona</td>
<td>752 Indiana Ta, 55001</td>
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<td>Russ Owen</td>
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<td>245 S. Knowles</td>
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Wednesday April 4, 2018 Public Hearing
Lake Elmo Airport Environmental Assessment/Environmental Assessment Worksheet
Oak-Land Middle School Auditorium
METROPOLITAN AIRPORTS COMMISSION

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

REPORTED BY:

Elizabeth J. Gangl

Registered Professional Reporter
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 Leque, Director - Environment
Dana Nelson, Manager - Noise, Environment & Planning
METROPOLITAN AIRPORTS COMMISSION STAFF PRESENT (Cont'd):

Neil Ralston, Airport Planner
Bridget Rief, Vice President - Planning and Development
Brian Ryks, Executive Director/Chief Executive Officer
Atif Saeed, Vice President - Finance and Revenue Development
Gary Schmidt, Director - Reliever Airports
Evan Wilson, Senior Attorney
CHAIR CRAMER: Good evening, everyone. We join the others in welcoming you here today and thank you for taking your time out on a somewhat still snowy evening to be here with us. I've got a little bit of a preamble to work through here and we can do that so we can put it into the record.

The April 4th, 2018 public hearing will now come to order. My name is Steve Cramer, and I am the Chair of the Planning, Development & Environment Committee of the Metropolitan Airports Commission. This Committee has been appointed as Hearing Officers for tonight's public hearing. With me this evening is the Chair of the Metropolitan Airports Commission, Dan Boivin, and MAC Commissioners. Why don't we just go down the row here and have each Commissioner introduce themselves, if they would, starting with Commissioner Madigan.

COMMISSIONER MADIGAN: Mike Madigan, District F.


COMMISSIONER MONACO: Don Monaco from Duluth.

COMMISSIONER KING: Rick King from Eden Prairie.

CHAIR CRAMER: Special thanks to
Commissioner Madigan. I know you spent a lot of time on this issue.

I welcome you all to tonight's public hearing. The purpose of this hearing is to provide the general public with an opportunity to comment on the Lake Elmo Airport Improvements Draft Environmental Assessment and Environmental Assessment Worksheet issued for public review. The Draft EA/EAW availability and a notice of this public hearing was posted on the MAC website, distributed through a GovDelivery subscription list, published in the Environmental Quality Board Monitor, the Minnesota State Register, the Pioneer Press, the Stillwater Gazette and the Oakdale/Lake Elmo Review. All announcements directed readers to the project website where the Draft EA/EAW could be reviewed.

Prior to this meeting a public open house was held at 6:00 p.m. and a presentation was provided at 6:30 p.m. Additionally, as part of this process, the MAC developed and executed a formal stakeholder engagement plan in collaboration with community and airport user stakeholders. In addition to a comprehensive project website, this effort included newsletters, an E-news subscription list, public notifications, formation of the Community Engagement Panel and public events held at key milestones in the process. The last of the three
community events was held on November 6th, 2017 at the Oak-Land Middle School auditorium, focusing on the environmental effects of the proposed improvements.

The EA/EAW is being completed in order to initiate proposed airfield improvements identified in the 2035 Lake Elmo Airport Long Term Comprehensive Plan, which was completed in 2016. The EA is required to comply with the federal National Environmental Policy Act and an EAW is required to comply with the Minnesota Environmental Policy Act. The Federal Aviation Administration is the lead federal agency responsible to the EA and the MAC is the responsible governmental unit for the state EAW review process; therefore, this hearing is being sponsored jointly by the FAA and the MAC. Upon completion of the EA/EAW process and the environmental determinations, the proposed improvements will be scheduled accordingly in the MAC's Capital Improvement Program process.

Tonight your testimony on the information contained in the Draft EA/EAW will be recorded by a court reporter. If you would like to submit comments but do not care to speak this evening you may do so in writing. Comment forms are available at the welcome desk. Completed forms may be submitted this evening or via email to Chad Leqve, Director of Environment,
Metropolitan Airports Commission, 6040-28th Avenue South, Minneapolis, Minnesota 55450, or by email to Chad Leqve, chad.leqve@mspmac.org.

Regardless of how comments are submitted, they must be submitted by the close of the comment period, which is 5:00 p.m. on April 19.

A speaker signup card must be completed in order to present oral comment at this hearing. Some of you may have already completed a speaker signup card at the welcome desk outside of the auditorium. If you would like to present oral comments but have not signed up, please raise your hand and a signup card will be delivered to you at your seat. You can do that during the course of the hearing if you would like. I will call upon the speakers who have signed up one by one to present their comments.

I respectfully request that you limit your statement to five minutes, and Mr. Leqve will be a timekeeper and give everyone a one-minute warning if you come up on the five-minute time frame. Although I don't want to restrict anyone's ability to present their comments, that will ensure that everyone wishing to speak has an opportunity to do so this evening. If you have additional comments following the five minutes, we request that you submit those comments in writing.
We will not be answering questions tonight and will not be taking any actions nor making any recommendations. All of the verbal and written comments will be taken into consideration before taking final action on the Draft EA/EAW at a future date.

Thanks for your cooperation. I will now open the hearing for public comment. I would first like to invite any public officials who wish to speak on the record to present their comments before we begin with the speaker signup cards.

I know there are two public officials that are present. Let me just see if, first, Dave Schultz from the West Lakeland Township Board would like to address the Commission?

MR. SCHULTZ: I'll pass.

CHAIR CRAMER: Pass. Okay. How about Ron Fredkove from the Baytown Township Board?

MR. FREDKOVE: Pass.

CHAIR CRAMER: Okay. Thank you, gentlemen, for being here and for your public service.

So let me go to the cards, and the microphone is right here in front. The first card is from Brad Cornell. Mr. Cornell, welcome.

MR. CORNELL: Good evening. First off, 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 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.

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.
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;
that your comprehensive plan is not aligned with our
township but you're proposing and pushing forward.

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 appears not to be very compatible with our township or the neighbors.

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. So that's my comments. I'll add further in writing.

CHAIR CRAMER: Thank you. Hold on just one second, Mr. Cornell.

Do you need any more information, Court Reporter?

COURT REPORTER: I would like people to say their name first and then spell the last name.

CHAIR CRAMER: Oh, I'm sorry, my fault.

MR. CORNELL: My name is Brad Cornell, C-O-R-N-E-L-L.

CHAIR CRAMER: Thank you, Mr. Cornell.

Next speaker is Mr. Krack. Mr. Krack.
MR. KRACK: I would like to yield the floor to the next person. I would like to hear what other people have to say and I may have some comments at the end.

CHAIR CRAMER: We'll come back to you. Thank you. Joel Surgenor? Joel?

MS. SURGENOR: Jnel.

CHAIR CRAMER: Jnel. The light's a little shaky up here, I apologize.

MS. SURGENOR: Jnel Surgenor.

S-U-R-G-E-N-O-R. J-N-E-L.

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 and there's no guarantee that you guys aren't going to increase your airplanes. You say not but, again, there's no guarantee. So that potential, you guys aren't going to -- the MAC is not going to give me new windows; we just built there less than a year ago. So those are my concerns. And then the removal of the land to expand the runway.

CHAIR CRAMER: Thank you very much.
Next card is from Anne Buchek. Ms. Buchek.

MS. BUCHEK: Hi. My name is Ann Buchek, B-U-C-H-E-C-K, A-N-N.

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 aeronautical facilities and services in that area."

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. If not all airport operations are being used fully, then how can you possibly provide the most 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.

I would encourage you to use the Holman Field. I read the EAW and was pleased to learn about the Schmidt Brewing Company and agree that the airport may need new pavement and a connector road; however, 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?

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 airport.
I would like to know how were these described times
determined?

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.
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.

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 ponding, will there also be possible causes for crashes? Loss of life?

CHAIR CRAMER: Ms. Buchek, we're about at the one-minute mark. Will you wrap it up? Thank you.

MS. BUCHECK: Okay. We all remember American Airlines' Captain Sully who had to land on the Hudson River. 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.

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. You may even wish to collaborate with the New Richmond Wisconsin Airport. Thank you.

CHAIR CRAMER: Thank you. We welcome those detailed remarks if you would like to submit them.

(Appplause.)

CHAIR CRAMER: The next person is Fred Brandt. Mr. Brandt?

MR. BRANDT: It's B-R-A-N-D-T. In the
interests of efficiency, I would like to read my comments. 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 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.

CHAIR CRAMER: Thank you, sir. If the last two speakers would be willing to submit their written comments to the court reporter? That would be helpful in creating a full record if you're willing to do that.

Okay. The next card is from Troy Wenck.

MR. WENCK: Thank you. My name is Troy Wenck, W-E-N-C-K. 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.

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 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.

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. 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.

Thank you for your work.

CHAIR CRAMER: Thank you for your comments.

The next speaker card is from Barry Rosell.

MR. ROSELL: Hi. My name is Barry Rosell, R-O-S-E-L-L, and 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 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."

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 -- excuse
the phrase -- but down our throats 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.

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.

So I also take issue with the comments over
"every three years," or however often we've come down
here and to listen to this. 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."

So I guess I'll end with this. 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. But if you can force this airport on us, why the heck can't you force pilots and the airport and some type of management system of the noise that is going to come. And I will -- I guess I'll end with that. Thank you.

CHAIR CRAMER: Thank you for your comments. Next speaker card is from John Renwick. Mr. Renwick.

MR. RENWICK: John Renwick. John with an H, R-E-N-W-I-C-K. I'm in support of the plan. I'm an airport user.

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.

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. Thank you.

CHAIR CRAMER: Thank you, sir.

The next card is Mike Graczyk. I'm sorry, I may have mispronounced that name.

MR. GRAYSON: It's Mike Graczyk, and I would like to come back for more comment.

CHAIR CRAMER: Okay. Mr. Krack, you're up unless there have been some other cards submitted? Oh, got a few. Mr. Krack, do you want to go now or --

MR. KRACK: I'll wait.

CHAIR CRAMER: While we're waiting for the cards, I neglected to introduce our attorney, Evan Wilson, who is here to keep us on the straight and narrow, so I thank you for being here.

Mark Wendorf.

MR. WENDORF: Good evening. Mark Wendorf,
W-E-N-D-O-R F. I'm from Baytown Township. I'm just off the runway going to the north of the airport and I've got a few comments here.

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. 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, and 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.

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. And as to the Holman Field, as somebody mentioned, it's dramatically underused right now as the other MAC airports are as well.
But my question is not about the -- or my comment is not about the total lack of need for this boondoggle, my question is this: 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. The extended runways -- and 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. Excuse me.

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. 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.

My point is this, so the question is this: As the MAC reps know here, of course, Section 13 of the Minnesota Constitution requires that before you take any action you must make sure that you can provide -- "that 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?

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.

With that, thank you.

CHAIR CRAMER: Thank you, sir, for your
comment.

Next speaker card is from Rob Creibich. Probably
got that name wrong. Sorry, Rob.

MR. CREIBICH: Close enough. My name is
Rob Creibich, C-R-E-I-B-I-C-H, and I'm probably the only
one speaking tonight from the other side of the river,
from New Richmond, Wisconsin, so I've heard our community
mentioned here. And 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.

We've got the second-busiest general aviation
airport in Wisconsin, and 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. For the Super Bowl we
had 40 corporate aircraft that landed at the New Richmond
Airport, including Terry Bradshaw, Sheryl Crow and Jimmy
Fallon. We routinely get the governor of the state to
land there.

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.

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, and I've
attended previous hearings, and to do the right thing for
federal taxpayers, and that is to reallocate these
dollars to New Richmond and not duplicate the service
there.

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.

We had 20 top state officials in New Richmond
just several weeks ago. We're looking to do a pilot
training facility there given the looming shortage of
pilots. We just -- we hate to butt into other people's
business but, again, this is federal tax dollars so we
think we have a right to vie for those dollars.

Thank you very much.

CHAIR CRAMER: You're welcome. Thank you.
(Applause.)

CHAIR CRAMER: Okay. The next card is from Molly Olson. Ms. Olson?

(Applause.)

MS. OLSON: My name is Molly, M-O-L-L-Y, Olson, O-L-S-O-N. I live in West Lakeland Township. 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, 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. We all know and have heard tonight that the plan was created in 1965 when the community looked extremely different. 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.

The other thing I hope FAA is reading this document, and this testimony, too, because 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.

And again, the noise. Of course -- thank you
everybody who has spoken tonight about the noise – of course there will be excess noise.

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.

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 from that group that trust their government to do the right thing or have given up, one of the two.

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? 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. It's small hobby farms -- planes, excuse me -- small hobby planes, and we're spending, what was it, $14 million to help satisfy the hobby for a lot of people?

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?

CHAIR CRAMER: Ms. Olson, the one-minute mark if you could wrap it up.

MS. OLSON: I'll wrap it up and just say it is incomprehensible that this volume of dollars would be spent for a project that is so unnecessary. 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.

CHAIR CRAMER: Thank you.

(Applause.)

CHAIR CRAMER: Next card is from Patrick Fleming. Mr. Fleming?

MR. FLEMING: My name is Patrick Fleming,

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, which are little cumbersome.

I appreciate your work on this and I look forward to a 3,500-foot runway. Thank you.

CHAIR COMMENTS: Thank you for your comments. I think we have a few more cards before we have Mr. Krack and Mr. Graczyk arm wrestle for who goes last.

MR. KRACK: Mr. Graczyk can go first.

CHAIR CRAMER: Susan Dunn. Susan Dunn?

Mark Montanari?

MS. DUNN: She's getting me the microphone.

CHAIR CRAMER: Sorry, I apologize. We'll go back to Ms. Dunn.

STAFF: Do we have a cordless mic? No?

CHAIR CRAMER: Do you have some written
comments you can submit?

    MS. DUNN: I do. I think I'll go ahead and
write them. But I do have to say that 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.

    CHAIR CRAMER: Okay.

    MS. DUNN: 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.

    CHAIR CRAMER: Okay. You certainly have
some time to write your comments down and get them into
the record, so thank you very much. I'm sorry we
couldn't accommodate you with the setup tonight.

    All right. Now Mr. Montanari.

    MR. MONTANARI: Mark Montanari,
M-O-N-T-A-N-A-R-I. 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. That's all I've got to say.

CHAIR CRAMER: Thank you, sir. Any other cards? All right. Mike Seeber.

MR. SEEBER: That's me, S-E-E-B -E-R. I live on Neal Avenue, and I have been to a number of these meetings. I'm opposed to the project. A couple of you probably know me or maybe you don't recognize me.
We have spoken against the project. It seems unnecessary. 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. There's -- you don't give me, I'll speak for myself, the impression of a trustworthy partner in this process. You give me the impression of a bully that just wants to have your way. You go through a process -- this is my feelings on it, I'll speak for myself again. 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. And I think what this all boils down to, I'll have to be honest, I don't care a lot for the MAC. I don't mind the airport being here and I'd be fine with repaving the runway as it is, keep it existing, but 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 every 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, and I think the very bottom -- and I came in a little bit late,
so forgive me if somebody else has said this. 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. And the gentleman from Wisconsin, the airport manager or -- I don't know what his title is.

MR. CREIBICH: Chamber.

MR. SEBBER: Chamber, thank you. I appreciated your comments.

-- said that 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.

So there should be -- the prospect or the process, it just does not seem fair.

And at a number of points along the way the information that we've been given has not been correct, and some have testified that they have confidence in what you've done. I've been here. I haven't seen Mr. Wenck
here before. Maybe he's been here before, maybe he hasn't. He has confidence. I don't. I've not been satisfied in any way. These meetings are show and it feels like you folks just want to have your way. So that's, that's my testimony.

CHAIR CRAMER: Okay. Great. Thank you, sir.

MR. SEEGER: Yep. Thank you.

CHAIR CRAMER: All right. Mr. Graczyk.

MR. GRACZYK: My name is Mike Graczyk, G-R-A-C-Z-Y-K, and 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. Who hasn't flown? Who hasn't learned to fly? And that's a good place to learn to fly. It's a good place to keep your
plane also.

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.

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.

So with that, I trust you do the best you can and keep up the good work.

CHAIR CRAMER: Thanks for your comments.

And then the last card I have, although others can certainly speak still, Mr. Krack.


I've been a pilot for over 50 years, I've flown out of MAC airports for just about all of that time, and I'm also the Chair of the Reliever Airports Advisory
Council, which is a MAC-sanctioned advisory group made up of representatives from each of the airports, so I have an interest in all of the relievers, as well as Anoka, which I fly out of.

    Well, I got an earful tonight. 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.

    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, given the other objectives that they're trying
to achieve, so I think MAC has listened.

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.
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, 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.

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 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.

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. Thank you.

CHAIR CRAMER: Thank you. No more cards --
(Applause.)

CHAIR CRAMER: -- but is there anyone else
who would like to speak this evening?

(No response.)

CHAIR CRAMER: All right. Seeing no one,
we have heard from all speakers who asked to make
comments tonight. I will officially adjourn this public
hearing, although again I would ask if Ms. Bucheck and
Mr. Brandt would be willing to submit their written
comments to the court reporter just to help us get the
record exactly right.

As a reminder, additional written comments must
be submitted by the close of the comment period, 5:00
p.m., on April 19th, by mail to Chad Leqve, Director of
Environment, Metropolitan Airports Commission, 6040-28th
Avenue South, Minneapolis, Minnesota 55450, or by email
to Chad Leqve, chad.leqve@mspmac.org.

Thank you all very much for coming tonight and
participating in the environmental review process. This
hearing is closed.

(Proceedings concluded at 8:05 p.m.)
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

[Signature]

Elizabeth J. Gangl
Registered Professional Reporter
Completed forms can be:
1) Left with us at the public hearing;
2) Sent via email to 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 33rd St. No. Lake Elmo

17A. Preserve & maintain current use & configuration of N. Elmo Airport
17B. Funds to New Richmond airport $11.5 million
17C. City Comprehensive Plan of N. Elmo had safety zones that were recently eliminated to aid in development like Easton Village & other developments in surrounding areas.
17D. MAC asked N. Elmo not to have high density development near the airport - But MAC was ignored & N. Elmo did what they wanted for the developer.
17E. # of aircraft at N. Elmo Airport continues to decrease to 183; it
17F. Do not fill in wetlands they recharge the aquifer
17G. Disrupting & removing the woodlands is yet another assault on the environment; noise very disruptive.
17H. Road replacement not
17I. How can wetlands be moved to another piece of the state & will 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

17J. A full EIS must be done if residents ignored.
17K. I support our airport & do not want it to close.
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   c/o MAC Environment Development
   6040 28th Avenue South
   Minneapolis, MN 55450

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Name:  Scott O'Connor
Address:  11 Peninsula Road, MN 55110

18A  As a pilot and a 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".

18B  21D serves an important role in the local metro
and in the MAC reliever airport system. It
is advantageous to everyone to make it as safe
as possible.

Please use the back side of this form for additional comments.

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Environmental-Assessment/Overview.aspx
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   c/o MAC Environment Development
   6040 26th Avenue South
   Minneapolis, MN 55450

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Name:  Janel Surgenor

Address:  11705 33rd St. N, Lake Elmo

19A I object to the proposal. I live in Easton Village and the noise currently is unbearable. 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. I highly doubt that the MAC will fund the surrounding neighborhoods with new noise reduction windows. I believe MAC is lying about the fact that there will not be bigger planes. I am also concerned about the loss of land, trees, and water areas. I feel the neighbors 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, increase of traffic on Manning Ave that would cause traffic accidents and car pedestrians 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

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

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
Name: RAYMOND LUCKSINGER

Address: 12025 5th St No. LAKE ELMO, MN 55042

I have lived all my life at this address for 75 yrs
I took flying lessons at the airport back in the 50's I was a member of the Civil Air Patrol and the Commerative Air Force at Flemming Field. I believe MAC has done a very good job at running the airport and I am for the preferred alternative plan.

People say it will devalue homes if this is true (why) are people 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?

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
BY FILLING THIS IN, YOU ACKNOWLEDGE THAT THIS IS PUBLIC INFORMATION AND MAY BE INCLUDED IN A PUBLIC DOCUMENT.

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   6040 28th Avenue South
   Minneapolis, MN 55450

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Name: 

Address: 12275 5th St. N. Lake Elmo, MN

I've lived on Lake Elmo all my life and enjoy seeing the planes, come stop over and watch the planes take off and land. MAC is doing a good job taking care of the air port. I'd like to see the money stay here on Lake Elmos air port and not in lets

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
Mr. Andrew Peek
Federal Aviation Administration
6020 28th 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.

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.

Thank you for your time.

Wade Rastall
2403 Northridge Avenue Court North
West Lakeland, MN  55082

FAA - DMA ADO
MINNEAPOLIS
APR 5  2018
RECEIVED
Name: Susan Dunn  
Address: 11018 Upper 33rd St. North  Lake Elmo MN

I attended the April 4, 2018 proposed lake Elmo Airport Expansion Meeting and oppose the expansion and do support maintaining the existing footprint.

24 A
After the April 4, 2018 meeting I went home and reviewed the Long Term Comprehensive Plan for Lake Elmo Airport (21D) June 2008.

24 B
Chapter 1 "The activity at the Lake Elmo Airport has been declining."

24 C
Chapter 2 "The number of based aircraft is expected to increase from 234 in 2005, to 291 in 2010 to 312 in 2025. (The number mentioned at the April 4, 2018 was 183)

"Micro jet operation is projected by 2025."

24 D
Please consider the new Richmond option as presented 4/4/2018. The old Lake Elmo airport first opened for operation in 1951 and since that time the Cities and Township have evolved around the airport making any expansion extremely environmentally sensitive and not conducive to this residential area.

24 E

Please use the back side of this form for additional comments.

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C/O MAC Environment Development
6040 28th Avenue South
Minneapolis, MN 55450

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Name: Ronald Fredkove
Address: 4220 Osmond Ave. No. BAYTOWN 55002

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 sharing 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.

Thank you,
Ronald Fredkove
Resident of 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
From: Nelson, Dana
To: Colleen Bosold; Evan Barrett
Cc: Leave, Chad
Subject: PW: 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 28th Avenue South
Minneapolis, MN 55450
O: 612-725-6330
F: 612-725-6310
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;

I very much oppose expanding the Lake Elmo airport. Besides the points made in today’s 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!!!

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.

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
651 491 4759
From: Steven Johnson [mailto:spdjjohnson@me.com]  
Sent: Thursday, April 05, 2018 12:04 PM  
To: Leque, Chad <Chad.Leque@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.

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 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 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. 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 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).

Thank you again for the opportunity to comment.

Steve Johnson  
13595 Greenwood Trail N
EA/EAW comment below.

Chad

-----Original Message-----
From: Jonathan Schmelz [mailto:jschmelz@saabwy.com]
Sent: Thursday, April 05, 2018 3:12 PM
To: Ralston, Neil <Neil.Ralston@mspmac.org>
Cc: Leque, Chad <Chad.Leque@mspmac.org>; Nelson, Dana <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.

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.

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.

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.
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.

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: Rod Ough <raough@yahoo.com>
Date: April 4, 2018 at 8:51:22 PM CDT
To: "chad.leqve@mspmac.org" <chad.leqve@mspmac.org>, "ContactLakeElmoAirportEA@mspmac.org"  
<ContactLakeElmoAirportEA@mspmac.org>
Subject: Lake Elmo Airport 21D

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.
5. 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 change). They also provide ground school for future pilots. None if that would happen if there was no airport.
6. lets not forget that the airport also support other businesses nearby the airport
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
with jets on their tails.


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
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  
evan.barrett@meadhunt.com | www.meadhunt.com

-----Original Message-----
From: Leqve, Chad <Chad.Leqve@mspmac.org>
Sent: Friday, April 6, 2018 10:21 AM
To: Joshua.Fitzpatrick@faa.gov <Joshua.Fitzpatrick@faa.gov>; Evan Barrett <Evan.Barrett@meadhunt.com>
Cc: Andy.Peek@faa.gov; Nancy.Nistler@faa.gov; Lindsay.Butler@faa.gov; 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>; evan.barrett@meadhunt.com
Cc: Andy.Peek@faa.gov; Nancy.Nistler@faa.gov; Lindsay.Butler@faa.gov; 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  
(612) 253-4639

-----Original Message-----
From: dianemcgann@earthlink.net [mailto:dianemcgann@earthlink.net]
Sent: Wednesday, April 04, 2018 3:02 PM
To: Peek, Andy (FAA) <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/
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.
Completed forms can be:
1) Left with us at the public hearing;
2) Sent via email to 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:  

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
CHAD E. LEQVE
Director of Environment
Metropolitan Airports Commission
6040 25th Avenue South
Minneapolis, MN 55450
O: 612-725-6326
F: 612-725-6310
www.MetroAirports.org
facebook twitter instagram

Begin forwarded message:

From: Eric Lobner <eric.lobner@gmail.com>
Date: April 7, 2018 at 2:38:06 PM CDT
To: Chad.leqve@mspmac.org
Subject: Support for Lake Elmo 21D Project

Chad,

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.

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.

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.

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: 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
F: 612-725-6310
www.MetroAirports.org
facebook twitter instagram

Begin forwarded message:
From: "Elizabeth Buckingham" <itabit@comcast.net>
Date: April 15, 2018 at 7:46:39 AM CDT
To: <chad.leqve@mspmac.org>
Cc: <andy.peek@faa.gov>, <rep.kathy.lohmer@house.mn>,
<sen.karin.housley@senate.mn>

Subject: Lake Elmo Airport Expansion
Comment letter.
April 11, 2018

TO: Metropolitan Airport Commission

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?

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.

The pilots should pay for any and all improvements designated by MAC because, after all, it’s the pilots’ Country Club.

Elizabeth Buckingham

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:itatb@comcast.net]
Sent: Saturday, April 14, 2018 10:25 AM
To: Leqve, Chad <Chad.Leqve@mspmac.org>
Cc: andy.peek@faa.gov; rep.kathy.lohmer@house.mn; sen.karin.housley@scnate.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.

34B 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.

Elizabeth Buckingham

34D PS. I expect a personal written reply from MAC.
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

DANAL NELSON
Manager – Noise, Environment and Planning
Metropolitan Airports Commission
6040 28th Avenue South
Minneapolis, MN 55450
O: 612-725-6300
F: 612-725-6310
www.macnoise.com

From: Jones, Norman [mailto:NJones@winthrop.com]
Sent: Saturday, April 14, 2018 9:26 AM
To: ContactLakeElmoAirportEA <ContactLakeElmoAirportEA@mspmac.org>
Cc: 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.

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.

35D 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
(512) 604-6605
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>
Sent: Monday, April 16, 2018 8:49 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>
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

-----Original Message-----
From: Ben Ross [mailto:ben.ross@comcast.net]
Sent: Sunday, April 15, 2018 2:28 PM
To: ContactLakeElmoAirportEA <ContactLakeElmoAirportEA@mspmac.org>
Subject: Public comment form
Name: Ben Ross

Address: 13178 24th Street W. N. West Lakeland, MN 55082

I submitted four questions on 8/1/15. 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, the NTSB would investigate all incidents. I have to assume that there are two incidents showing runway length being the root cause due to the lack of response.

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. Just as we homeowners close to build where we did those same pilots close to house their aircraft where they did. This project is serving the hobbies of pilots who have options rather than the homeowners who built here (West Lakeland, Bayport, and Lake Elmo). If the airport doesn’t meet twin needs they can go elsewhere, for example River Falls.

Please use the back side of this form for additional comments.
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
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
   Subject: Lake Elmo
To: Metropolitan Airports Commission

Re: Lake Elmo Airport Expansion

I have friends that live just off 30th 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 30th street. The proposed reconfiguration of 30th 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
Chad E. Leqve
Director of Environment
Metropolitan Airports Commission
6040 28th Avenue South
Minneapolis, MN 55440
Phone: 612-725-6326
Fax: 612-725-6310
www.MetroAirports.org
facebook twitter instagram

Begin forwarded message:

From: Pete Widin <pete@artisanenvironments.com>
Date: April 14, 2018 at 1:45:38 PM CDT
To: 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
A public comment

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
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Begin forwarded message:

From: Derek Gilbert <derek@anch.orinsuranceagents.com>
Date: April 6, 2018 at 4:55:53 PM CDT
To: "Chad.leqve@mspmac.org" <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.

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.

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.

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 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.

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 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
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

-----Original Message-----
From: craig berggren [mailto:craigberggren@me.com]
Sent: Wednesday, April 11, 2018 11:35 AM
To: ContactLakeElmoAirportEA <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 Elmo Airport a more safer reliever airport for the twin cities.

40C Thank You.

Craig Berggren
5865 Neal Ave N. #333
Stillwater, Mn. 55082

40D Sent from my iPad
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 28th Avenue South
Minneapolis, MN 55450
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F: 612-725-6310
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Begin forwarded message:

From: Michelle Rose <michellerose0713@gmail.com>
Date: April 15, 2018 at 7:06:56 PM CDT
To: chad.leqve@mspmac.org
Cc: sen.karin.houley@senate.mn, rep.kathy.lohmer@house.mn
Subject: Lake Elmo airport expansion
Reply-To: michellerose0713@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.
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.

Thank you for your attention.

Michelle Rose
13170 24th Street Ct N
West Lakeland, MN 55082
FYI

CHAD E. LEQVE
Director of Environment
Metropolitan Airports Commission
6040 28th Avenue South
Minneapolis, MN 55440
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facebook twitter instagram

Begin forwarded message:

From: Karen Baltzer <kibaltzer@msn.com>
Date: April 15, 2018 at 12:12:54 PM CDT
To: "Chad.Leqve@mspmac.org" <Chad.Leqve@mspmac.org>
Subject: STOP the proposed Lake Elmo Airport expansion

April 15, 2018

Dear Mr. Leqve:

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:

- 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?
• 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.

• 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 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.

• 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.

• No zoning was 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).

• There is significant potential for increased groundwater contamination in our wells due to the disruption of the current watershed with this project.

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.

Best Regards,

Karen Baltzer
13232 20th Street C. 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 28th 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>
Date: April 16, 2018 at 12:49:00 PM CDT
To: Chad.leqve@mspmac.org, sen.karin.houslev@senate.mn, 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 unacceptable. Currently the trees add a buffer to light and noise pollution from the airport.

43D | Also the impact of moving 30th 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
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  
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 wetlands 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
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
facebook twitter instagram

Begin forwarded message:

From: LU <jirancl2@outlook.com>
Date: April 16, 2018 at 5:57:17 PM CDT
To: "Chad.leqve@mspmac.org" <Chad.leqve@mspmac.org>
Cc: "sen.karin.husley@senate.mn" <sen.karin.husley@senate.mn>,
"rep.kathy.lohmer@house.mn" <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!

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.
45E | 30th St relocation unsafe
45G | Lack of zoning
45I | Larger aircraft are unwanted
45K | Added noise and light pollution

45F | Further ground water contamination
45H | Major loss of property value
45J | Loss and damage to wildlife
45L | Loss of trees and natural habitat

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: leqve, Chad <Chad.Leqve@mspmac.org>

Sent: Monday, April 16, 2018 8:54 PM

To: Evan Barnett <Evan.Barnett@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 28th Avenue South
Minneapolis, MN 55450
O: 612-725-6326
F: 612-725-6310
www.MetroAirports.org
facebook twitter instagram

Begin forwarded message:

From: Laura Kaschmitter <runnerlaura@yahoo.com>
Date: April 16, 2018 at 8:21:55 PM CDT
To: "Chad.Leqve@mspmac.org" <Chad.Leqve@mspmac.org>
Cc: "Sen. Karin Housley" <sen.karin.housley@senate.mn>, Kathy Lohmer <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
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.

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
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F: 612-725-6310
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Begin forwarded message:

From: "Elizabeth Buckingham" <itabit@comcast.net>
Date: April 16, 2018 at 7:23:19 AM CDT
To: <chad.leqve@mspmac.org>
Cc: <andy.peek@faa.gov>, <rep.kathy.lohmer@house.mn>,
<sen.karin.houley@senate.mn>
Subject: Lake Elmo Airport Expansion

Comment letter.
April 7, 2018

TO: Metropolitan Airport Commission

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”.
1. Runways would be lengthened and re-positioned which means larger or more extensive – an improvement would be to resurface the existing runways.
2. 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.
3. Removal of 20 acres of woodlands is certainly extensive – not a needed improvement.

It’s time MAC steps up and tells the world it does not speak truthfully.

Elizabeth Buckingham

PS. I expect a personal written reply from MAC.
While I do serve 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,

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
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.

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
FWD: Unwanted Lake Elmo Airport Expansion

FYI

CHAD E. LEQVE
Director of Environment
Metropolitan Airports Commission
6040 28th Avenue South
Minneapolis, MN 55430
O: 612-725-6326
F: 612-725-6310
www.MetroAirports.org
facebook twitter instagram

Begin forwarded message:

From: L U <jlurch2@outlook.com>
Date: April 16, 2018 at 5:55:04 PM CDT
To: "Chad.leqve@mspmac.org" <Chad.leqve@mspmac.org>
Cc: "sen.karin.housley@senate.mn" <sen.karin.housley@senate.mn>,
"rep.kathy.lohmer@house.mn" <rep.kathy.lohmer@house.mn>
Subject: Unwanted Lake Elmo Airport Expansion

Dear Mr. Chad Leqve

49A Regardarding 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
| 49E | 30th St relocation unsafe   | Further ground water contamination | 49F |
| 49G | Lack of zoning             | Major loss of property value       | 49H |
| 49I | Larger aircraft are unwanted| Loss and damage to wildlife        | 49J |
| 49K | Added noise and light pollution | Loss of trees and natural habitat  | 49L |

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.
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
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Begin forwarded message:

From: "Scott Hanson" <scott.hanson@comcast.net>
Date: April 16, 2018 at 10:09:27 PM CDT
To: <Chad.Leave@mspmac.org>
Cc: <sen.karin.housley@senate.mn>, <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.

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  
Ô: 612-725-6326  
F: 612-725-6310  
www.MetroAirports.org  
facebook twitter instagram

Begin forwarded message:

From: Mick <mkaschmitter@hotmail.com>  
Date: April 16, 2018 at 8:14:13 PM CDT  
To: "Chad.leqve@mspmac.org" <Chad.leqve@mspmac.org>  
Cc: "sen.karin.housley@senate.mn" <sen.karin.housley@senate.mn>, "rep.kathy.lohmer@house.mn" <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:

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.

<table>
<thead>
<tr>
<th>Based Aircraft</th>
<th>Single-Engine</th>
<th>Multi-Engine</th>
<th>Jet</th>
<th>Rotorcraft</th>
<th>Other (including sailplanes)</th>
<th>Total Based Aircraft</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operations</td>
<td>183</td>
<td>6</td>
<td>0</td>
<td>3</td>
<td>0</td>
<td>192</td>
</tr>
<tr>
<td>Itinerant</td>
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<tr>
<td>Aircraft</td>
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<td>Operations</td>
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<tr>
<td>Total Aircraft Operations</td>
<td>26,498</td>
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<td></td>
</tr>
</tbody>
</table>

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.

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?

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  
facebook twitter instagram

Begin forwarded message:  
From: "Elizabeth Buckingham" <itabit@comcast.net>  
Date: April 17, 2018 at 7:31:23 AM CDT  
To: <chad.leqve@mspmac.org>  
Cc: <andy.peek@faa.gov>, <rep.kathy.lohmer@house.mn>, <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?

52C | 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

52E | PS. I expect a personal written reply from MAC.
From: Evan Barrett
To: Coleen Bosold
Subject: FW: Opposition to Lake Elmo Airport Expansion
Date: Tuesday, April 17, 2018 3:00:31 PM
Attachments: AirPortCommission.pdf

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 30th 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.

53C 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.

53D First, there’s what it will do to the landscape. The rerouting of 30th 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 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.

53E 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 lighted runways. This also brings the noise much closer to home and will be a much larger annoyance than it is now.

53F 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:

53G • 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.

53H • 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.

- 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.

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.

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.

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@mspmac.org>
Sent: Tuesday, April 17, 2018 12:09 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: Lake Elmo EA / EAW Comments

FYI

Chad

From: Vince Anderson [mailto:vjanderson@pressenter.com]
Sent: Tuesday, April 17, 2018 11:49 AM
To: Leqve, Chad <Chad.Leqve@mspmac.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
e-mail VJAnderson@pressenter.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.

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?

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.

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.

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.'

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 i: 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 at the time when ‘private’ aircraft use is diminishing as reported by MAC in the April 1 issue of the St. Paul Pioneer Press.

54L 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.

54M 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.
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.’

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 understand) has not been maintained and now contains trees that have grown though the fence. This is evident along both 30th 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.

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. 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.

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 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
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? 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.

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?

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?

Figure 4-5 has several dark areas which are not in the legend.

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,

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.

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.

On page 4-22 in the first paragraph there is some discussion of flooding. Note my previous statement about NOHW.

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.
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.

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.

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. 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 30th street. Note especially that this added length applies to all traffic including diesel buses and heavy duty vehicles.

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.

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.

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. I can find no mention of the extra road length which would be necessary when calculating vehicle emissions. ‘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.

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 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.

54AZ | Nowhere does MAC calibrate the tool with field observations and measurements, something easy to do and important to do but not done.

54BB | 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.

54BC | 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!

54BD | 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.

54BE | 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.

54BF | 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.
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.

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.

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.

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.

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.'

Page 5-28 in the 2nd 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.

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.

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
evan.barrett@meadhunt.com | 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
F: 612-725-6310
www.MetroAirports.org
facebook twitter instagram

Begin forwarded message:

From: "Stephen Buckingham" <swbuckingham@comcast.net>
Date: April 17, 2018 at 2:45:45 PM CDT
To: <Chad.Leqve@mspmac.org>
Cc: <Andy.Peek@faa.gov>, <sen.karin.housley@senate.mn>, 'rep.' <kathy.lohmer@house.mn>
Subject: Comments on Lake Elmo Airport Expansion

Chad,

Here are my comments on the proposed expansion.
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.

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 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.

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. 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 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.

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: "Nelson, Dana" <Dana.Nelson@mspmac.org>
Date: April 19, 2018 at 8:12:06 AM CDT
To: "Wilson, Evan" <Evan.Wilson@mspmac.org>, Evan Barrett
     <Evan.Barrett@meadhunt.com>, "Ralston, Neil" <Neil.Ralston@mspmac.org>,
     "Leqve, Chad" <Chad.Leqve@mspmac.org>
Subject: FW: My input

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

From: Cliff Wells [mailto:majorgeeke@gmail.com]
Sent: Wednesday, April 18, 2018 6:32 PM
To: ContactLakeElmoAirportEA <ContactLakeElmoAirportEA@mspmac.org>
Subject: My input

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.
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. 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
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th Ave S
Minneapolis, MN  55450

Dear Mr. Leqve;

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 in which the airport would have the potential of bringing larger aircrafts & additional helicopters to this recreational airport. 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.

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 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?

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?

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 & 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 subside 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.

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.

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

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:abit@comcast.net]
Sent: Wednesday, April 18, 2018 8:47 AM
To: Leqve, Chad <Chad.Leqve@mspmac.org>
Cc: andy.peek@faa.gov; rep.kathy.lohmer@house.mn; sen.karin.housley@senate.mn
Subject: Lake Elmo Airport Expansion
Comment letter.
April 12, 2018

TO: Metropolitan Airport Commission

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 condescension. 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.

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.

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
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 30th Street North, a major access route, to accommodate pilots is wrong by endangering the neighbors unnecessarily with worsened roadways. MAC should keep its Expansion within its current fenced footprint.

Elizabeth Buckingham

PS. I expect a personal written reply from MAC.
To: Metropolitan Airports Commission

Re: Lake Elmo Airport Expansion

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.

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 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 firsthand 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.
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 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?

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.

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.

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 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.

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), Kahan (112), Peightan (10) and Rhyse (7)
2939 Neal Avenue North
Stillwater, MN 55082
651-261-1160
Inoouncr@comcast.net

cc: Chad Leque, 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

Sent from my iPhone

Begin forwarded message:

From: "Nelson, Dana" <Dana.Nelson@mspmac.org>  
Date: April 18, 2018 at 11:40:06 AM CDT  
To: "Leque, Chad" <Chad.Leque@mspmac.org>, "Wilson, Evan" <Evan.Wilson@mspmac.org>, Evan Barrett <Evan.Barrett@meadhunt.com>, Colleen Bosold <Colleen.Bosold@meadhunt.com>, "Ralston, Neil" <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

From: John Regenold [mailto:jregenoldoutdoorsman@gmail.com]  
Sent: Wednesday, April 18, 2018 11:23 AM  
To: ContactLakeElmoAirportEA <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 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; 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 J.R.
Address:  545 Ryan Ave W, Roseville, MN 55113

Hello,

Let me first start off by saying that I am in support of the runway expansion at Lake Elmo. 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
April 13, 2018

TO: Metropolitan Airport Commission

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 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.

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. 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.

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.

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?

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

PS. I expect a personal written reply from MAC.
Begin forwarded message:

From: "Nelson, Dana" <Dana.Nelson@mspmac.org>
Date: April 18, 2018 at 11:40:06 AM CDT
To: "Leqve, Chad" <Chad.Leqve@mspmac.org>, "Wilson, Evan" <Evil. Wilson@mspmac.org>, Evan Barrett <Evan.Barrett@meadhunt.com>, Colleen Bosold <Colleen.Bosold@meadhunt.com>, "Ralston, Neil" <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

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; 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:  

Address:  

Hi, I just wanted to send off a note to let you know how important Lake Elmo Airport is to my family. We have been flying out of Lake Elmo since the late 1960's, and supported the FBOs family businesses. Safe is always a concern, and any expansion would be very welcomed and a great improvement for the surrounding community. Our family has a hangar on the field, and we support EAA and Fly Young Eagles.

Thank you,

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
April 17, 2018

Chad Leque, Director of Environment
Metropolitan Airports Commission
6040 28th Ave S
Minneapolis, MN 55450

Dear Mr. Leque;

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 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. The MAC representatives have said they do not monitor what nor do they control what flies in or out of the airport.

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?

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 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.

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 today as a major township road for commuting to and from work every day?

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.

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?

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
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?

My last comments: The MAC planning team and upper management has been poor neighbors for the past 30 years. The only time the come to our town meeting is to being 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?

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 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 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.

Brad Cornell
2733 Neal Ave. N.
West Lakeland, MN 55082
Sent from my iPhone

Begin forwarded message:

From: "Leque, Chad" <Chad.Leqve@mspmac.org>
Date: April 19, 2018 at 1:21:49 PM CDT
To: "evan.barrett@meadhunt.com" <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

FYI

Chad

From: Lynette Spitzer [mailto:talibichonlady@gmail.com]
Sent: Thursday, April 19, 2018 11:13 AM
To: Leque, Chad <Chad.Leqve@mspmac.org>
Cc: andy.peek@faa.gov; rep.kathy.lohmer@house.mn; sen.karin.housley@senate.mn
Subject: Lake Elmo Airport

Dear Mr. Leque,

I am opposed to the runway expansion at Lake Elmo Airport for the following reasons:

64A | I am opposed to the runway expansion at Lake Elmo Airport for the following reasons:
64B | • Encroachment of runways onto 30th Street and Manning Avenue
64C | • Rerouting and/or possible vacating of 30th Street.
64D | • Loss of trees and natural habitat.
64E | • Added noise and/or noise pollution.
64F | • More noise and light pollution forcing development of a new noise and light abatement policy.

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@mspmac.org>
Sent: Thursday, April 19, 2018 2:08 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: 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
facebook twitter instagram

Begin forwarded message:

From: Lynette Spitzer <tallbichonlady@gmail.com>
Date: April 19, 2018 at 10:21:07 AM CDT
To: chad.leqve@mspmac.org
Cc: rep.kathy.lohmer@house.mn, sen.karin.housley@senate.mn, 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
c: Andy Peek, FAA
Representative Kathy Lohmer
From: Chad Leqve <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 28th Avenue South
Minneapolis, MN 55450
C: 612-725-6326
F: 512-725-6310
www.MetroAirports.org
facebook twitter instagram

Begin forwarded message:

From: djbucheck@comcast.net
Date: April 19, 2018 at 1:59:34 PM CDT
To: 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
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
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th 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 Leqve, 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 Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th Avenue S
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

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.

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.

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.

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.

Thank you.

Respectfully submitted,
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th Avenue S
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

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:

- 1 mile radius: 348 parcels valued at $93,997,000.00
- 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.

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.

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.

Respectfully submitted,

Jodie Bellis
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th 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.

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”.

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,

[Signature]
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th 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,

Kate Kopp
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th Avenue S
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

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.

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’s time for the MAC and the FAA to acknowledge that this expansion doesn’t make sense for the airport.

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 28th Avenue S
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

72A I am **OPPOSED** to runway expansion at Lake Elmo Airport.

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.

72C 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 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.

72E 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 28th 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.

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**

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,

[Signature]

[Last Name]
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th Avenue S
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

I am **OPPOSED** to runway expansion at Lake Elmo Airport.

The proposed expansion will disrupt 30th Street, the land that is contaminated with TCE which will affect our wells, the natural habitat, both plant and wildlife that depend on that property to survive. It will bring in noise and light pollution, larger planes that, even with longer runways will struggle to take off and land here.

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.

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.

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,

Sincerely,

[Signature]
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th Avenue S
Minneapolis, MN  55450

Re: Lake Elmo Airport Expansion

I am **OPPOSED** to runway expansion at Lake Elmo Airport.

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.

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.

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,

[Signature]
April 17, 2018

Chad Leqve, Director of Environment  
Metropolitan Airports Commission  
6040 28th 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 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,

[Signature]

1 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 28th Avenue S
Minneapolis, MN 55450

Re: Lake Elmo Airport Expansion

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 sight 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.

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...

Respectfully submitted,

[Signature]
April 17, 2018

Chad Leqve, Director of Environment
Metropolitan Airports Commission
6040 28th Avenue S
Minneapolis, MN  55450

Re: Lake Elmo Airport Expansion

I am **OPPOSED** to runway expansion at Lake Elmo Airport.

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.

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 plan’s road.

Residents in both townships rely on 30th 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.

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,
My name is Patrick Fleming. 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 just 9 minutes from the 21D. Any other airport is at least 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.

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.
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.

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.

I support the runway repaving and extension and hope the project goes smoothly.

-patrick fleming-

fleming@fastmail.com
April 18, 2018

Chad Leqve, 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, 30th 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”.

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:

<table>
<thead>
<tr>
<th>Aircraft Type</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single engine</td>
<td>172</td>
</tr>
<tr>
<td>Multi-engine</td>
<td>4</td>
</tr>
<tr>
<td>Rotorcraft</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>177</strong></td>
</tr>
</tbody>
</table>

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.”
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 go. Someone at Mead & Hunt or MAC decided that we counted the touch and go 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.

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.

- 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

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.

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.

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. 30th Street was recently upgraded to a major contributing artery road in Washington County.

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.

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.

Respectfully submitted,
Mary Vierling
West Lakeland Township

Cc: Senator Karin Housley
    Representative Kathy Lohmer
    Andy Peek, FAA
From: Michael Seeber <seeber@winternet.com>
Date: April 19, 2018 at 3:14:35 PM CDT
To: <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

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.

Double speak

Last week in the public comment meeting they stated this is not and 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 its 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!

Mike Madigan is untruthful or doesn’t remember
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
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
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 allow by federal and state authorities.

New Richmond airport a better use of resources
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
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.
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
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 Buccheck
2301 Legion Avenue
Lake Elmo MN 55042
djbuccheck@comcast.net
Begin forwarded message:

From: "Maddy & Patrick Fleming" <fleming@fastmail.com>
Date: April 19, 2018 at 6:39:03 PM CDT
To: chad.leqve@mspmac.org
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.

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
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  
6040 28th Avenue South  
Minneapolis, MN 55450  
O: 612-725-6326  
F: 612-725-6310  
www.MetroAirports.org  
facebook twitter instagram

Begin forwarded message:

From: dibucheck@comcast.net  
Date: April 19, 2018 at 2:12:42 PM CDT  
To: Chad.Leqve@mspmac.org  
Subject: Lake Elmo airport comments

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. 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  
djbucheck@comcast.net
From: Chad Leqve <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
6040 28th Avenue South
Minneapolis, MN 55450
O: 612-725-6326
F: 612-725-6310
www.MetroAirports.org
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Begin forwarded message:

From: Molly K Olson <molly@mollyKolson.com>
Date: April 19, 2018 at 4:59:51 PM CDT
To: <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 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
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 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.

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.

- 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).
- 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.
- 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 beginning an expansion plan, and this was ignored or minimized by M.A.C “hired gun.”
- And there is MORE that we have told M.A.C. please contact us for more details.

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 MISREPRENSETED 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.
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.

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 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.

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.

PLEASE STOP THIS EXPANSION.

Molly K Olson
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 28th Avenue South
Minneapolis, MN 55450
O: 612-725-6326
F: 612-725-6310
www.MetroAirports.org
facebook twitter instagram

Begin forwarded message:

From: <Andy.Peek@faa.gov>
Date: April 20, 2018 at 6:40:57 AM CDT
To: <spitzkrieg72@gmail.com>
Cc: <Joshua.Fitzpatrick@faa.gov>, <Chad.Leqve@mspmac.org>
Subject: RE: Message from 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]
Sent: Thursday, April 19, 2018 3:07 PM
To: Peek, Andy (FAA) <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/dme-ado/

Message:
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To Whom It May Concern,

86A 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.

86C Respectfully submitted,

Hans Spitzer
2654 Neal Ave N
West Lakeland Township,
MN 55082
651-472-4755 (mobile)
Sarah Emmel

--- 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>; Leque, Chad <Chad.Leque@mspmac.org>; Ralston, Neil <Neil.Ralston@mspmac.org>; Colleen Bosold <Colleen.Bosold@meadhunt.com>
Subject: FW: Lake Elmo Airport

--- Original Message ---

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 55430
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

--- Original Message ---

Robert Lupelow
3908 Homewood Ave
White Bear Lake, Mn. 55110
612-804-3009

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 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 28th Avenue S  
Minneapolis, MN 55450

April 20, 2018

Mr. Peek;

Please find attached a copy of a comment letter which was sent to Director Levee 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  
ahirmsdakota@comcast.net

FAA - DMA ADO  
MINNEAPOLIS  
APR 26 2013

RECEIVED
Metropolitan Airport Commission

To: Chad Leqve and the Metropolitan Airport Commission Members

Director Leqve and MAC Commissioners,

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.

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 30th 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 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. 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.

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.

- 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

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

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.

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. A number of disrespectful comments were addressed to the community members by the Commissioners and MAC personnel. This does not build good relationships.
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.

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
halcordsdakota@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 4th 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 30th 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
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.

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.

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 30th Street North will cause a serious disruption"

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.)

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:

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.

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.

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.

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.

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,  
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 78th Street, Suite 370 | Minneapolis, MN 55439  
evan.barrett@meadhunt.com | 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 28th Avenue South  
Minneapolis, MN 55450  
O: 612-725-6330  
F: 612-725-6310  
www.macnoise.com

From: Mark Werner [mailto:mwerner257@q.com]  
Sent: Saturday, April 21, 2018 11:00 AM  
To: ContactLakeElmoAirportEA <ContactLakeElmoAirportEA@mspmac.org>  
Subject: Lake Elmo Environmental Assessment

Re: 30th street design

90A I want to add my support for the airport expansion but 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 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.
April 17, 2018

Mr. Andrew Peek
Federal Aviation Administration
6020 28th Ave S, Room 102
Minneapolis, MN 55450

Dear Mr. Peek;

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 runways at the airport.

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?

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.

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?

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 & 30th 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 subside 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.

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

[Signature]
TO: Federal Aviation Administration, Attention Andrew Peek
6020 28th Ave, South, room 102
Minneapolis, MN 55450
April 17, 2018

Dear Mr. Andrew Peek

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 30th 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 and used as a recreational airport for the past 31 years that we have lived in West Lakeland. The MAC director what nor do they control what flies in or out of the

We have asked MAC over the past 30 years many questions and always got vague answers to simple questions like the ones listed below:

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.

2. Why is it that MAC never attended any planning meetings or public hearings when land around the airport was being developed?

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?

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?

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?

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?

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?
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 30th 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?

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 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?

11. Why is it that MAC can ignore state rules for safety zones wouldn’t MAC want to be compliant to

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?

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?

15. Wouldn’t actually closing generate a significate 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?

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?

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
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 30th 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.

Brad Cornell
2733 Neal Ave. N.
West Lakeland, MN 55082
April 15, 2018

To: Mr. Chad Leqve – Director

Subject: Lake Elmo Airport Expansion Opposition

Mr. Leqve –

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 on city water and sewer.

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.

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
Item G –
Draft Lake Elmo Airport EA/EAW Municipal/Agency
Comments and Responses

[EA/EAW Appendix N]
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

<table>
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<tr>
<th>Commenter</th>
<th>Representing</th>
<th>Date of Correspondence</th>
<th>Comment IDs</th>
<th>See Pages</th>
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<tbody>
<tr>
<td>Becky Balk</td>
<td>Minnesota Department of Agriculture</td>
<td>February 27, 2018</td>
<td>1</td>
<td>1-3</td>
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<tr>
<td>Jennifer Wiltgen</td>
<td>Minnesota Department of Transportation</td>
<td>March 21, 2018</td>
<td>2-4</td>
<td>3-4</td>
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<tr>
<td>Rebecca Horton</td>
<td>Minnesota Department of Natural Resources</td>
<td>April 13, 2018</td>
<td>5-13</td>
<td>4-8</td>
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<tr>
<td>Jill Lucas</td>
<td>Valley Branch Watershed District</td>
<td>April 13, 2018</td>
<td>14-23</td>
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<tr>
<td>Jay Riggs</td>
<td>Washington Conservation District</td>
<td>April 18, 2018</td>
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<tr>
<td>Wayne Sandberg</td>
<td>Washington County Public Works</td>
<td>April 19, 2018</td>
<td>33-34</td>
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<tr>
<td>Karen Kromar</td>
<td>Minnesota Pollution Control Agency</td>
<td>April 19, 2018</td>
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<tr>
<td>Kenneth A. Westlake</td>
<td>U.S. Environmental Protection Agency</td>
<td>April 19, 2018</td>
<td>37-38</td>
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<tr>
<td>Thomas E. Casey</td>
<td>West Lakeland Township</td>
<td>April 17, 2018</td>
<td>39-146</td>
<td>19-103</td>
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<tr>
<td>Thomas E. Casey</td>
<td>West Lakeland Township</td>
<td>April 18, 2018</td>
<td>147</td>
<td>104-106</td>
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<tr>
<td>Stuart Grubb</td>
<td>West Lakeland Township</td>
<td>April 10, 2018</td>
<td>148-168</td>
<td>106-124</td>
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<tr>
<td>Ryan Stempski</td>
<td>West Lakeland Township</td>
<td>March 14, 2018</td>
<td>169-175</td>
<td>124-128</td>
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Minnesota Department of Agriculture, Agricultural Marketing & Development Division, Email dated February 27, 2018

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<tr>
<th>ID</th>
<th>Subject</th>
<th>Response</th>
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<tr>
<td>1</td>
<td>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. The MDA recommends that the EA/EAW address the acreage or impact of severed, triangulated, or isolated farmland resulting from the proposed alignment of 30th Street potentially impacting the parcel located in southwest corner of 30th 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 approximately 7.6 acres of uneconomic remnants under this alternative and considered them as “indirect impacts.” The area on the southwest corner of 30th Street and Neal Avenue is currently Airport property. Following realignment of 30th Street, the area north of the new road segment would be contiguous with agricultural...</td>
<td>Alternative B as referenced in this comment corresponds to 30th 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.”</td>
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<td>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.</td>
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<td>Minnesota Department of Transportation, Metropolitan District, Letter dated March 21, 2018</td>
<td>2</td>
<td><strong>Traffic:</strong> MN 5 was a turnback to Washington County. The alternatives 4A &amp; 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>.</td>
</tr>
<tr>
<td>Minnesota Department of Transportation, Metropolitan District, Letter dated March 21, 2018</td>
<td>3</td>
<td><strong>Permits:</strong> 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:metropemitapps.dot@state.mn.us">metropemitapps.dot@state.mn.us</a>. Please direct any questions regarding permit requirements to Buck Craig (651-234-7911) of MnDOT’s Metro Permits Section.</td>
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<tr>
<td>Minnesota Department of Transportation, Metropolitan District, Letter</td>
<td>4</td>
<td><strong>Review Submittal Options:</strong> 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:</td>
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<tr>
<td>dated March 21, 2018</td>
<td>1.</td>
<td>One (1) electronic pdf version of the plans. MnDOT accept plans at <a href="mailto:metrodevreviews.dot@state.mn.us">metrodevreviews.dot@state.mn.us</a> provided that each e-mail is less than 20 megabytes.</td>
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<td>2.</td>
<td>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.</td>
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<td></td>
<td>3.</td>
<td>One (1) compact disk. 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 <a href="mailto:metrodevreviews.dot@state.mn.us">metrodevreviews.dot@state.mn.us</a> indicating the plans have been submitted on the FTP site.</td>
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<tr>
<td>Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018</td>
<td>5</td>
<td>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 40th 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 &quot;Karst Feature Inventory Points&quot; data layer that can be downloaded and utilized to</td>
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<td>5</td>
<td>Commenter</td>
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<tr>
<td>Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018</td>
<td>6</td>
<td>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.</td>
</tr>
<tr>
<td>Minnesota Department of Natural Resources, Ecological and Water Resources,</td>
<td>7</td>
<td>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</td>
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<td>Letter dated April 13, 2018</td>
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<td>within the two-mile radius, please list their PWI number for identification purposes.</td>
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<tr>
<td>Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018</td>
<td>9</td>
<td>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.</td>
</tr>
<tr>
<td>Minnesota Department of Natural Resources, Ecological and Water Resources, Letter dated April 13, 2018</td>
<td>10</td>
<td>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.</td>
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<tr>
<td>Minnesota Department of Natural Resources</td>
<td>11</td>
<td>Section 4.5.6 Wetlands:</td>
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<tr>
<td>Resources, Ecological and Water Resources, Letter dated April 13, 2018</td>
<td></td>
<td>How would filling of the wetlands north of 30th Street North impact the water level of and flow into public water wetland 82046100?</td>
</tr>
</tbody>
</table>
| 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:  
- Avoid filling or dewatering wetlands during the winter.  
- Implement stringent sediment and erosion control methods.  
- Use wildlife-friendly erosion control methods.  
- Monitor for turtles during construction and report any sightings to the MDNR.  
- 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.  
- 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. 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 |


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<tr>
<td>Letter dated April 13, 2018</td>
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<td>volumes associated with the project are not expected to exceed these thresholds.</td>
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<tr>
<td>Valley Branch Watershed District, Letter dated April 13, 2018</td>
<td>14</td>
<td>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.</td>
<td>Comment noted. Required permits and approvals are set forth in EA/EAW Table 5-6.</td>
</tr>
<tr>
<td>Valley Branch Watershed District, Letter dated April 13, 2018</td>
<td>15</td>
<td>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.</td>
<td>Comment noted. The Wetland Conservation Act sequencing requirements are described in Section 4.5.6. 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.</td>
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<tr>
<td>Valley Branch Watershed District, Letter</td>
<td>16</td>
<td>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</td>
<td>The MAC does not propose to create on-site compensatory storage given wildlife hazard concerns.</td>
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<tr>
<td>dated April 13, 2018</td>
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<td>accomplished with the creation of onsite compensatory storage.</td>
<td>MAC will consider using wetland bank credits to mitigate for wetland impacts associated with the preferred alternative.</td>
</tr>
</tbody>
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| Valley Branch Watershed District, Letter dated April 13, 2018 | 17 | 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:  
   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.”  
   The language in the EA/EAW regarding wetland buffers should be revised, and the final design and permit application will need to consider all | 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. |
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<tr>
<td>Valley Branch Watershed District, Letter dated April 13, 2018</td>
<td>18</td>
<td>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 30th 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.</td>
<td>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 30th Street North would need to be coordinated with the future road owner.</td>
</tr>
<tr>
<td>Valley Branch Watershed District, Letter dated April 13, 2018</td>
<td>19</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>Valley Branch Watershed District, Letter dated April 13, 2018</td>
<td>20</td>
<td>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</td>
<td>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</td>
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<td>Valley Branch Watershed District, Letter dated April 13, 2018</td>
<td>21</td>
<td>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.</td>
<td>See response to VBWD Comment ID 20 above. 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</td>
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<td>Valley Branch Watershed District, Letter dated April 13, 2018</td>
<td>22</td>
<td>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.</td>
<td>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.</td>
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<td>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.</td>
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<td>Valley Branch Watershed District, Letter dated April 13, 2018</td>
<td>23</td>
<td>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.</td>
<td>The MAC acknowledges that all VBWD rules and regulations will need to be satisfied during project design and permitting.</td>
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<td>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 30th Street. Under VBWD Rule 5, <em>Floodplain Management</em>, 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</td>
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<td>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 30th 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 30th Street North. This information has been incorporated in Section 5.14.3 of the Final EA/EAW. 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, <em>Floodplain Management and Protection</em>, 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. No hydraulic modeling has been completed for this project to confirm the floodplain elevations set by VBWD.</td>
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<td>Washington Conservation District, Letter dated April 18, 2018</td>
<td>24</td>
<td>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.</td>
<td>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.</td>
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<td>Washington Conservation District, Letter dated April 18, 2018</td>
<td>25</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>Washington Conservation District, Letter dated April 18, 2018</td>
<td>26</td>
<td>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</td>
<td>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</td>
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|           |    | 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? | 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:  
  - Use mechanical means to remove snow and ice from pavements to reduce use of pavement deicer.  
  - Chemical pavement deicer use is primarily reserved for runways and critical taxiway areas.  
  - Chemical 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. |
| Washington Conservation District, Letter dated April 18, 2018 | 27 | Section 5 – Biological Resources; Section 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. | The acreage calculations shown in Table 4-6 are based on Mead & Hunt’s analysis of the latest MLCCS data available on the Minnesota Geospatial Commons website (https://gisdata.mn.gov/). Mead & 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. The source citation has been updated to include MDNR and WCD. Mead & Hunt was included in the source citation because analysis and consolidation of |
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<td>Washington Conservation District, Letter dated April 18, 2018</td>
<td>28</td>
<td>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.</td>
<td>Native vegetation and habitat restoration will be considered where it does not conflict with Airport operations or agricultural activity.</td>
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<td>Washington Conservation District, Letter dated April 18, 2018</td>
<td>29</td>
<td>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.</td>
<td>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.</td>
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<td>Washington Conservation District, Letter dated April 18, 2018</td>
<td>30</td>
<td>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.</td>
<td>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</td>
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<td>Washington Conservation District, Letter dated April 18, 2018</td>
<td>31</td>
<td>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).</td>
<td>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.</td>
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<td>Washington Conservation District, Letter dated April 18, 2018</td>
<td>32</td>
<td>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</td>
<td>Comment noted. Bioretention measures will be considered during final design.</td>
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<td>Washington County, Public Works Department, Letter dated April 19, 2018</td>
<td>33</td>
<td>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.</td>
<td>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.</td>
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<td>Washington County, Public Works Department, Letter dated April 19, 2018</td>
<td>34</td>
<td>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.</td>
<td>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.</td>
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<td>Minnesota Pollution Control Agency, Letter dated April 19, 2018</td>
<td>35</td>
<td>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.</td>
<td>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.</td>
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<td>Minnesota Pollution Control Agency, Letter dated April 19, 2018</td>
<td>36</td>
<td>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.</td>
<td>Comment noted. In-water best management practices will be integrated as required during design.</td>
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<td>U.S. Environmental Protection Agency, Letter dated April 19, 2018</td>
<td>37</td>
<td>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).</td>
<td>Comment noted.</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency, Letter dated April 19, 2018</td>
<td>38</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018</td>
<td>39</td>
<td>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</td>
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<td>2018 (on behalf of West Lakeland Township)</td>
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<td>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.</td>
<td>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. 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. 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.</td>
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<tr>
<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>40</td>
<td>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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West</td>
<td>41</td>
<td>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</td>
<td>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</td>
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<td>Lakeland Township</td>
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<td>the proposed Lake Elmo Airport Runway 14/32 Relocation/Extension and Associated Improvements, in Washington County, Minnesota.</td>
<td>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.</td>
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<tr>
<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>42</td>
<td>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.</td>
<td>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</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>43</td>
<td>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).</td>
<td>Comment noted.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>44</td>
<td>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).</td>
<td>Comment noted.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>45</td>
<td>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:</td>
<td>Comment noted.</td>
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<td>Lakeland Township)</td>
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<td>“(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) <strong>to enrich the understanding of the ecological systems and natural resources important to the state and to the nation.</strong>” [Emphasis added.]</td>
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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
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>46</td>
<td>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 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</td>
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<td>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).</td>
<td></td>
<td>“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.) 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West</td>
<td>47</td>
<td>B. PURPOSE OF AN EIS. (THE RGU CANNOT ABANDON ITS DUTY TO ORDER AN EIS BY DEFERING ISSUES TO PERMIT PROCESSES.) “The purpose of an EIS is to provide information to evaluate proposed actions that have 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. 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.</td>
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<td>Lakeland Township</td>
<td>4410.3100</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>48</td>
<td>C. AN EAW CANNOT SUBSTITUTE FOR AN EIS</td>
<td>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.</td>
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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).]
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.**

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<tr>
<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>49</td>
<td>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.]</td>
<td>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.</td>
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<td>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.</td>
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</table>
| Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 50 | **IV. ITEMIZED COMMENTS TO EA/EAW**
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). | 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. |
<p>| Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 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. 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. | Comment noted. 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. |
| Mr. Thomas E. Casey, Attorney | 52 | <strong>Page 2-2, paragraph 1:</strong> | The Airport Pavement Management Program for the MAC reliever airports includes periodic pavement |</p>
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<td>at Law, Letter dated April 17,</td>
<td>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).]</td>
<td>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.</td>
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<td>2018 (on behalf of West Lakeland Township)</td>
<td>The EA/EAW is inconsistent with the Airnav rating and must be reconciled.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>53</td>
<td><strong>Page 2-2, paragraph 1:</strong> 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>54</td>
<td><strong>Page 2-4, paragraph 1:</strong> 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, “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</td>
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| **Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)** | 55 | **Page 2-4, last paragraph:** 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. | Mead & 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, https://aspm.faa.gov/tfms/sys/main.asp) 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.

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 pounds. |
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>56</td>
<td><strong>Page 2-7:</strong> 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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>57</td>
<td><strong>Page 2-8:</strong> 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 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.</td>
<td>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</td>
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| Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 58 | Long Term Comprehensive Plan considered 3,200 feet. Why not now? | 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.

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.”

Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 58 | Page 3-2: 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), | 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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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. 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.

Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)

Page 3-2: 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 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 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 & 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.
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>60</td>
<td>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.]</td>
<td>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 inaccurate. 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).</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>61</td>
<td>Page 3-2: 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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>62</td>
<td><strong>Page 3-4:</strong> 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.</td>
<td>See response to Stuart Grubb letter, comment ID 167.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>63</td>
<td><strong>Page 3-4, last paragraph:</strong> 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.</td>
<td>See response to Comment ID 58 above regarding anticipated increases in Airport use by multi-engine piston, turboprop, and jet aircraft. 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 30th 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>64</td>
<td><strong>Page 3-8, paragraph 1:</strong> 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 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.</td>
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<td>size, which they are not. This false impression must be rectified.</td>
<td>(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 30th 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>65</td>
<td><strong>Page 3-9, Figure 3.3:</strong> 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).</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>66</td>
<td><strong>Page 3-14:</strong> 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</td>
<td>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</td>
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<td>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.</td>
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<td>Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions. The noise modeling inputs and narrative are provided in Appendix J.</td>
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<td>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. The DNL noise contours shown in the 2035 LTCP were developed using the FAA Integrated Noise</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West</td>
<td>67</td>
<td>Page 3-17: 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.</td>
<td>The first paragraph on Page 3-17 of the Draft EA/EAW describes the 30th Street North Alternative 3. The speed reduction was intended to be a comparison with the Alternatives 1 and 2 for 30th Street North. To clarify this intent, the document has been updated to read:</td>
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| Lakeland Township |    | 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 30th Street to a “major collector” road. The EA/EAW is inadequate by not addressing this change. | “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 30th Street is 55 miles per hour.”  
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 30th Street North do not fit this description and therefore are not identified as turning movements.  
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 |
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>68</td>
<td>Page 3-18, Figure 3-7: 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.</td>
<td>The proposed realigned section of 30th 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 30th 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>69</td>
<td>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. 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</td>
<td>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</td>
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<td>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.</td>
<td>zoning by a JAZB would need to be revised to reflect the project that the EA/EAW evaluates. 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. 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. The EA/EAW includes available and adequate information regarding zoning for purposes of evaluating the proposed action and is therefore adequate and complete.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>70</td>
<td>Page 3-22: The EA/EAW states, <strong>&quot;Install obstruction lighting.&quot;</strong> 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</td>
<td>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. 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. 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</td>
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<td><strong>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</strong></td>
<td>71</td>
<td><strong>Page 3-23:</strong> The EA/EAW states: <strong>Logistical Factors.</strong> 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</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>72</td>
<td>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).]</td>
<td>See response to Comment ID 71, above.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>73</td>
<td><strong>Page 3-29:</strong> 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.</td>
<td><strong>Page 4-5:</strong> 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. 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. This correction does not change the environmental analysis, nor does it change the findings of the Draft EA/EAW.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>74</td>
<td>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.</td>
<td>See response to comment ID 69, above.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>75</td>
<td><strong>Page 4-13:</strong> 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.</td>
<td><strong>Page 4-27:</strong> 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 30th St.); and Exhibit 2B (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 &amp; 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 determinantal for these observations.</td>
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<td>Mr. Thomas E. Casey, Attorney</td>
<td>76</td>
<td><strong>Page 5-6:</strong></td>
<td>Current biotic communities on the Airport are described in EA/EAW Section 4.6. As noted in</td>
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<td>at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
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<td>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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>77</td>
<td>Page 5-9: 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.</td>
<td>See response to Minnesota Department of Agriculture, Comment ID 1, above.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter</td>
<td>78</td>
<td>Page 5-12: Paragraph 5.9.1, subparagraph 1 states in part: “The preferred alternative would move the</td>
<td>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.</td>
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| dated April 17, 2018 (on behalf of West Lakeland Township) | 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.) | 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.
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.
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. |
| Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 79 | Page 5-12: Paragraph 5.9.1, subparagraph 2, states in part, “Before completing the EA/EAW process, the MAC will start convening a Joint Airport Zoning | See response to Comment ID 69, above. |
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 be 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.

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 & Vehicle Classification Program Guidelines” provide the following guidance regarding appropriate seasonal considerations for traffic counts.

1.) Length of Season: Traffic counts should be taken between April 1st and October 1st (October 31st...
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>81</td>
<td>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.</td>
<td>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...</td>
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|           |    | **without describing whether or not the proposed project complies with these standards:**
|           |    | **“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.**
<p>|           |    | <strong>2-1. GENERAL.</strong> 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** |
|           |    | <strong>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.</strong> |
|           |    | <strong>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.</strong> |</p>
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|           |    | 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/.)” 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                                                                                                   |
<p>|           |    |                                                                acciones, the MAC cannot require off-site entities to limit wildlife attractants.                                                                                                                      | 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. Stormwater detention ponds will be designed to drain completely within a 48-hour period, as required by FAA Advisory Circular 150/5200-33B. |
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>82</td>
<td>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.</td>
<td>See response to comment regarding aircraft noise analysis on Page 3-14, Comment ID 66 above. 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. The noise contours developed for the EA/EAW consider the effect of terrain for the no action and</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>83</td>
<td>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 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. 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. See response to comment regarding light emissions analysis on Page 3-22, Comment ID 70 above.</td>
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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 30th Street North may require an FAA-approved land release from
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West</td>
<td>84</td>
<td>Page 5-23: 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</td>
<td>See response to Valley Branch Watershed District, Comment ID 15, above.</td>
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<td>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.)</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>85</td>
<td>Page 5-25: 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.</td>
<td>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 30th 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>86</td>
<td>Page 5-28: 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</td>
<td>The FEMA floodplain map shown in Figure 4-9 is dated February 3, 2010. This map shows the floodplain south of 30th Street as Flood Hazard Zone A, an approximate Zone which indicates a 100-year flood elevation had not been determined. The VBWD</td>
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<td>of West Lakeland Township)</td>
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<td>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.</td>
<td>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. For more information on evaluation of floodplain impacts, see response to VBWD, Comment ID 23, above.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>87</td>
<td>Page 5-29: Paragraph 5.14.4 (&quot;Other Water Resources&quot;) 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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>88</td>
<td>Appendix A – Runway Length Needs Determination Page A-2: 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,</td>
<td>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.</td>
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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.

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

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<td>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-ons-go. 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.</td>
<td>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.</td>
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<td>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. 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. 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. 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</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>89</td>
<td><strong>Page A-3:</strong> 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.</td>
<td>See response to Comment ID 88, above. 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. 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 Minneapolis-St. Paul Reliever Airports Activity Forecasts Technical Report</td>
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(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.

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).

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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>90</td>
<td>Page A-4: 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</td>
<td>See response to Comment ID 88, above. 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. See response to comment regarding military operations on Page 4-5, Comment ID 73 above.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>91</td>
<td>Page A-7: 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.&quot; 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.</td>
<td>See response to Comment ID 88, above. 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. 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. 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...</td>
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<td>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.</td>
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<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 1992</td>
<td>92</td>
<td>Page A-9: Paragraph 1 states: “Mead &amp; Hunt concluded that the 5,156 operations for which the origin/destination airport is unknown represent</td>
<td>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</td>
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<td>2018 (on behalf of West Lakeland Township)</td>
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<td>flights between Lake Elmo and airports outside the Twin Cities metro area.” The EA/EAW is inadequate by failing to provide the supporting data.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>93</td>
<td><strong>Page A-11:</strong> Table 12 contains estimates. The EA/EAW is adequate by failing to provide the data supporting these estimates.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>94</td>
<td><strong>Page A-12:</strong> 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.</td>
<td>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</td>
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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)

Page A-13: 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.

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.

Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)

Page A-15: 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

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.

The Draft EA/EAW counts takeoffs, landings, and touch-and-go’s at Lake Elmo Airport as operations,
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>97</td>
<td>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.” <strong>This statement is not accurate.</strong> 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, <strong>in writing</strong>, that MAC will <strong>not</strong> change the role and classification of the airport.</td>
<td>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.</td>
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<td>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 Elmo. 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</td>
<td>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: - the aircraft’s performance characteristics; - the runway end’s proximity to the hangar and apron areas; - the purpose of the flight; - the origination or destination of the flight; - the runway’s approach and departure environment; - available instrument approach procedures; and - available runway length on the primary runway when compared to the crosswind runway. 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. 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</td>
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<td><strong>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</strong></td>
<td>98</td>
<td>lbs., far larger than the Category 2 aircraft using Lake Elmo Airport today.</td>
<td>planning purposes than it does for air traffic control purposes. MAC does not intend to change the role of Lake Elmo Airport and the family of aircraft it serves.</td>
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**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 The categories defined by AC 150/5325-4B are the relevant categories for determining required runway length in accordance with FAA guidance. 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...
Commenter | ID | Subject | Response
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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 99 | 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 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. 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 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.

See response to Comment ID 97, above regarding the purpose of FAA Order JO 7110.65W aircraft category definitions.

In response to community input received during the LTCP process regarding the need for the proposed runway length, the MAC requested that Mead & 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.
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter</td>
<td>100</td>
<td><strong>Page A-22:</strong> Paragraph 1 states in part: “However, during periods when the runway is wet and slippery from</td>
<td>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</td>
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<td>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.</td>
<td>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 $V_1$ 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. 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.”</td>
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<td>dated April 17, 2018 (on behalf of West Lakeland Township)</td>
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<td>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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>101</td>
<td><strong>Page A-23:</strong> Table 23 is entitled “Average Adjusted Landing Lengths.” [Emphasis added.] The EA/EAW is inadequate by failing to explain that <em>averaging</em> makes everything appear better that 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</td>
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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.

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.

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.

For the purposes of determining the required runway lengths at airports, the FAA considers wet and slippery runway surface conditions for only landing operations.

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.
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<td>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.</td>
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<td>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</td>
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Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)

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<td>102</td>
<td><strong>Page A-24:</strong> 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.</td>
<td>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. 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>103</td>
<td><strong>Page A-25:</strong> 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.</td>
<td>Use of alternate existing airports is considered as an alternative in Chapter 3, Section 3.2.2, Pages 3-3 through 3-5.</td>
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| Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 104  | **Appendix B – 30th Street North Realignment Alternatives Review**
Page 34 (pdf number): 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. | 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 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  | **Page 41 (pdf number):** 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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<td>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).</td>
<td>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. 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>106</td>
<td><strong>Page 42 (pdf number):</strong> 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.</td>
<td>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 30th 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>107</td>
<td><strong>Page 48 (pdf number):</strong> 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</td>
<td>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</td>
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<td>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: “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 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.” 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 30th Street North and seeking, as appropriate, a land release from the Federal Aviation Administration (FAA) to allow for realignment of 30th 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 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.” The MAC is open to continuing discussions to find a solution whereby 30th Street North may continue to exist as a realigned through street. For more information regarding the design standards associated with the preferred 30th Street North</td>
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<td>108</td>
<td><strong>Appendix C – Wetland Delineation, Functional Assessment, and Associated Correspondence</strong></td>
<td>*realignment alternative, see response to Mr. Ryan Stempski Comment ID 171, below.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
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<td><strong>Sub-Appendix H - MNRAM Functional Assessment Forms</strong></td>
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<td><strong>Page 265 (pdf number):</strong></td>
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<td>In the Wetland Functional Assessment Summary chart, Wetland #1’s Sensitivity to Storm water &amp; Urban Development is rated <strong>“Exceptional.”</strong> The EA/EAW inadequately addresses the potential for a significant environmental impact on this wetland.</td>
<td>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 30th 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>109</td>
<td><strong>Appendix D – Section 106 Documentation and Correspondence Page 297 (pdf number):</strong> The last paragraph states in part: “Aircraft size and type will <strong>not</strong> 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</td>
<td>See response to Comment ID 58, above regarding expected increases in operations by multi-engine piston, turboprop, and jet aircraft. See response to Comment ID 97, above regarding the purpose of FAA Order JO 7110.65W definitions.</td>
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<tr>
<td>Mr. Thomas E. Casey, Attorney at Law, Letter</td>
<td>110</td>
<td>Appendix E – U.S. Fish &amp; Wildlife Section 7 Consultation and Correspondence</td>
<td>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.</td>
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<td>dated April 17, 2018 (on behalf of West Lakeland Township)</td>
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<td>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.</td>
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<p>| Mr. Thomas E. Casey, Attorney at Law, Letter | 111| 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 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 | 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 |
| dated April 17, 2018 (on behalf of West Lakeland Township) |    |                                                                                       |                                                                                                                                                                                                        |</p>
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<td>out gathering nectar, the EA/EAW is inadequate and incomplete.</td>
<td>“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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>112</td>
<td>Page 440 (pdf number): 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.</td>
<td>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.</td>
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| Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 113 | **Appendix G – USDA NRCS Farmland Conversion Impact Rating Form AD-1006**  
Page 464 (pdf number):  
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 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. | 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 | **Appendix H – Environmental Site Assessment Report**  
Page 481 (pdf number):  
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 | See response to Comment ID 86, above regarding FEMA and VBWD floodplain maps.  
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. |
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>115</td>
<td><strong>Page 483 (pdf number):</strong> 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.</td>
<td>The referenced statement is made in the context of observations by Mead &amp; 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>116</td>
<td><strong>Page 490 (pdf number):</strong> 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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>117</td>
<td><strong>Page 555 (pdf number):</strong> 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 use of pavement deicing materials remains well...</td>
<td>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...</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>118</td>
<td>Page 580 (pdf number): 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.</td>
<td>See response to Washington Conservation District Comment ID 26, and Comment ID 117 above. The MAC has been permitted to use deicing chemicals at the Airport for decades and has always remained well below annual permit levels.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>119</td>
<td>Appendix J – Aircraft Noise Analysis Report Page 698 (pdf number): 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 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</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>120</td>
<td>Page 703 (pdf number): 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.</td>
<td>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. 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>121</td>
<td>Appendix L – Public Involvement Page 1028 (pdf last page): 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</td>
<td>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</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>122</td>
<td>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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>123</td>
<td>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).]</td>
<td>See Response to Comment ID 122 above.</td>
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<td>[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).]</td>
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<td>As explained below, <strong>all four of the factors, necessary to order an EIS for the proposed Lake Elmo Airport runway expansion, are satisfied.</strong></td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>124</td>
<td>“A. type, extent, and irreversibility of environmental effects.”</td>
<td>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. See Response to Comment ID 122 above. See also Response to Mr. Stuart Grubb Comment IDs 148-168.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>125</td>
<td>“B. cumulative potential effects of related or anticipated future projects.”</td>
<td>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. “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. 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</td>
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| Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 126 | **“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 | 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.  
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.  
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 |
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<td>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).]</td>
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<td>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.]</td>
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<td>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 (8th Cir. 1992).</td>
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<td>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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>127</td>
<td>“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.</td>
<td>Comment noted. The EA/EAW does not rely upon a discussion of other available environmental studies regarding environmental effects.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>128</td>
<td>VI. INSUFFICIENT INFORMATION DOES NOT ALLEVIATE THE NEED FOR AN EIS. 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</td>
<td>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. 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</td>
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<td><strong>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.</strong> 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.</td>
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<td>times during a growing season and do not provide RPBB habitat.</td>
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<p>| Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 129 | 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.) | 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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|           |    | 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. |         |         |

Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township) | 130 | **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. | 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 |
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>131</td>
<td>C. WEST LAKELAND TOWNSHIP’S “PREFERRED ALTERNATIVE” WOULD BE STUDIED. Missing from the EA/EAWS 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.</td>
<td>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. City of Richfield v. FAA, 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>132</td>
<td>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 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/EAWS during the public comment period for the purpose of</td>
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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.

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.

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.
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>133</td>
<td>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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>134</td>
<td>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.</td>
<td>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.</td>
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<tr>
<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>135</td>
<td>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).</td>
<td>Comment noted. See also Response to Comment IDs 133 and 134 above.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>136</td>
<td>X. BIAS.</td>
<td>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. 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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>137</td>
<td>XI. CONFLICT OF INTEREST.</td>
<td>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. 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.</td>
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<td>Mr. Thomas E. Casey, Attorney</td>
<td>138</td>
<td>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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney</td>
<td>139</td>
<td>To avoid the appearance of impropriety, MAC should agree that the Minnesota Department of</td>
<td>See Response to Comment ID 137 above.</td>
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<td>of West Lakeland Township)</td>
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<td>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. 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.</td>
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<td>dated April 17, 2018 (on behalf of West Lakeland Township)</td>
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<td>Transportation is the “RGU”, who would then decide whether or not to order an EIS.</td>
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| 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 Exhibit 1. 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 Exhibit 4. Mr. Stempski specifically challenges 30th 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 Lakeland Township) | 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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<td>Lakeland Township)</td>
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<td>facilities for sanitary sewer and watermain installation. They money has been budget for several years now <strong>with no apparent actions.</strong> 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.)</td>
<td>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.</td>
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<td>primarily related to concerns about the possibility of noncompliant well and septic systems that may be in existence at the airports.</td>
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<td>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.</td>
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<td>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.</td>
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<td>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</td>
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<td>AMr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>143</td>
<td>XV. WEST LAKELAND TOWNSHIP’S PREFERRED ALTERNATIVE – OMITTED. 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</td>
<td>See Response to Comment ID 131 above.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>144</td>
<td>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.</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
<td>145</td>
<td>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&quot; 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.”</td>
<td>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.</td>
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<td>Mr. Thomas E. Casey, Attorney</td>
<td>146</td>
<td>Therefore, the West Lakeland Township Board of Supervisors respectfully requests that</td>
<td>Comment noted. The EA/EAW adequately and completely addresses the issues identified by this</td>
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<td>at Law, Letter dated April 17, 2018 (on behalf of West Lakeland Township)</td>
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<td>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.</td>
<td>comment, as noted in responses to previous Comment IDs 39-145.</td>
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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).
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<td>Mr. Thomas E. Casey, Attorney at Law, Letter dated April 18, 2018 (on behalf of West Lakeland Township)</td>
<td>147</td>
<td>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. 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.</td>
<td>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, Airport Design. 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. The following responds to assertions regarding each change in the airfield layout identified by this comment. 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. 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.</td>
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<td>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 <strong>simplify the airfield geometry</strong> by <strong>reducing</strong> the number of designated <strong>“hot spots”</strong> on the airfield, which represent the areas with the <strong>greatest potential</strong> for pilot confusion and <strong>incursion errors</strong>. 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. <strong>Risk factors</strong> that contribute to runway incursions may include unclear taxiway markings, airport signage, and more complex issues such as the <strong>runway or taxiway layout</strong>.” [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.) In summary, the preferred alternative runway and taxiway design contains more intersections – and more dangerous intersections - of runways and</td>
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<td>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. 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 <strong>reduce</strong> 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.</td>
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier</td>
<td>148</td>
<td>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</td>
<td>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</td>
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<td>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.</td>
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<td>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. 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.</td>
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<td>Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
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<td>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).</td>
<td>or permits will be required from FEMA for this project, as FEMA delegates floodplain management authority to local jurisdictions. 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. 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>. 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. Prior to construction activity in the floodplain, a 100-year flood elevation will be established around all</td>
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
<td>149</td>
<td>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.</td>
<td>Comment noted. All of the 30th 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.</td>
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
<td>150</td>
<td>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.</td>
<td>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 30th Street North.</td>
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<td>West Lakeland Township)</td>
<td>5650.2, Floodplain Management and Protection, associated with preferred alternative.&quot; 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.</td>
<td>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 30th Street North.</td>
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
<td>152</td>
<td>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.</td>
<td>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. 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</td>
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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.

Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)

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.

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.

Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)

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

Comment noted. See response to VBWD Comment ID 22, above.
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
<td>155</td>
<td>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.</td>
<td>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. 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. Comment noted. See response to VBWD Comment ID 20, above. 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. 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.</td>
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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.

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.

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
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| Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township) | 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. | modification such as amending the soil are incorporated.  
See also response to Grubb Comment ID 160 below.  
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.  
According to FAA Order 1050.1F, a significant impact to surface water exists if the action would:  
1. Exceed water quality standards established by Federal, state, local, and tribal regulatory agencies; or  
2. Contaminate public drinking water supply such that public health may be adversely affected. |


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| 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. |
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<td>(on behalf of West Lakeland Township)</td>
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<td>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.</td>
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| Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township) | 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 | Comment noted. |
<p>| 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 |</p>
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<td>161</td>
<td>5. Water Quantity Impacts to Downs Lake</td>
<td>See responses to VBWD Comment IDs 14-23, above, and responses to Grubb Comment IDs 157-160 above</td>
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<td>Mr. Stuart Grubb, PG, Emmons and</td>
<td></td>
<td>The VBWD Downs Lake Management Plan states</td>
<td>&quot;The small size of Downs Lake (relative to its</td>
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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.

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.

According to FAA Order 1050.1F, a significant impact to surface water exists if the action would:
1. Exceed water quality standards established by Federal, state, local, and tribal regulatory agencies; or
2. Contaminate public drinking water supply such that public health may be adversely affected.

Neither of these impacts will occur with the proposed action, and therefore the project will not result in significant water quality impact.
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<td>Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
<td>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.&quot; 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.”</td>
<td>Comment noted. See responses to Mr. Stuart Grubb Comment IDs 157-161 above. 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.</td>
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
<td>162</td>
<td>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.</td>
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| Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township) | 163 | 6. Groundwater Impacts                       | 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). See response to Comment ID 58, regarding projected increases in multi-engine piston, turboprop, and jet aircraft operations at the Airport. 

The MAC has no plans to install additional fuel storage/distribution facilities at Lake Elmo Airport, including Jet A fuel. See response to Comment ID 125 regarding Cumulative Impacts and Cumulative Potential Effects. |
| Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township) | 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. | 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. 

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. 

As stated under response to Mr. Stuart Grubb, Comment ID 160, above, the Airport currently has an... |
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier</td>
<td>165</td>
<td>7. Contaminated Soils</td>
<td>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. 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</td>
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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

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|           |    |         | 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 |
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<td><a href="http://www.vbwd.org/reports/groundwater_levels/index.php">http://www.vbwd.org/reports/groundwater_levels/index.php</a>. 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. The MAC is committed to protecting the groundwater and other water resources on which the Airport and</td>
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
<td>166</td>
<td>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.</td>
<td>Subsurface soils will be investigated for VOCs during geotechnical analysis related to project design. See also response to Grubb Comment ID 165 above.</td>
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<td>Mr. Stuart Grubb, PG, Emmons and Olivier Resources, Letter dated</td>
<td>167</td>
<td>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</td>
<td>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</td>
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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.

Mr. Stuart Grubb, PG, Emmons and 168 9. Conclusions  The issues discussed in this letter identify mistakes and omissions in the EAW for the 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.
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<td>Olivier Resources, Letter dated April 10, 2018 (on behalf of West Lakeland Township)</td>
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<td>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.</td>
<td>Environmental Policy Act, and as defined under the Minnesota Environmental Policy Act.</td>
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<td>Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)</td>
<td>169</td>
<td>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.</td>
<td>Comment noted.</td>
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<tr>
<td>Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)</td>
<td>170</td>
<td>Proposed Road Alignment (Horizontal Curvature): 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</td>
<td>As referenced in Mr. Ryan Stempski 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 30th Street North is the Airport’s property. No other properties would experience hardship with respect to</td>
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<td>2018 (on behalf of West Lakeland Township)</td>
<td>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.</td>
<td>platting their own land or providing convenient access to their property.</td>
<td></td>
</tr>
<tr>
<td>Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)</td>
<td>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.</td>
<td>Preliminary design details regarding horizontal curve radius, length, and superelevation are included in EA/EAW Appendix B, Table 3. 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. 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. 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</td>
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<tr>
<td>Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)</td>
<td>172</td>
<td>Construction and Long-Term Maintenance: 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 (siltis 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</td>
<td>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. As noted in its Draft 2040 Comprehensive Plan, &quot;Baytown has offered to continuing the current shared maintenance [of 30th 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.&quot; If the area north of the realigned 30th 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 30th Street North can continue to exist as a realigned through street.</td>
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<td>Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)</td>
<td>173</td>
<td>Additional responsibility onto West Lakeland that does not exist today.</td>
<td>Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)</td>
</tr>
<tr>
<td>Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)</td>
<td>174</td>
<td>Storm Water Management: 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</td>
<td>Ditches and culverts will be integrated into the project design to provide drainage from the north to the south side of the realigned 30th 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.</td>
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<td>Lakeland Township)</td>
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<td>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.</td>
<td>See also response to Stempski Comment ID 173 above.</td>
</tr>
<tr>
<td>Mr. Ryan Stempski, P.E., Township Engineer, Focus Engineering, Inc., Memorandum dated March 14, 2018 (on behalf of West Lakeland Township)</td>
<td>175</td>
<td>Wetland Impacts Due to Realignment: Environmental impacts to existing wetlands will be commented on by the LGU for this area, which is Valley Branch Watershed District.</td>
<td>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.</td>
</tr>
</tbody>
</table>
FYI - MDA comment on 21D EA/EAW

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
facebook twitter instagram

Begin forwarded message:

From: "Balk, Becky (MDA)" <becky.balk@state.mn.us>
Date: February 27, 2018 at 2:06:45 PM CST
To: "chad.leqve@mspmac.org" <chad.leqve@mspmac.org>, "Patton, Bob (MDA)" <bob.patton@state.mn.us>, "Balk, Becky (MDA)" <becky.balk@state.mn.us>, "Wohlman, Matthew (MDA)" <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.

The MDA recommends that the EA/EAW address the acreage or impact of severed, triangulated or isolated farmland resulting from the proposed alignment of 30th Street potentially impacting the parcel located in southwest corner of 30th 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
March 21st, 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.

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.

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

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: 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:

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.
2. Three (3) sets of full size plans. Although submitting seven sets of full size plans will expedite the review process. Send plans to:
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 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
Dear Chad Leqve,

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

- 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 40th 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:

- 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:

- 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.
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 waters work permit rules.
- How would filling of the wetlands north of 30th Street North impact the water level of and flow into public water wetland 82046100?

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.

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.

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
Minnesota Regions Prone to Surface Karst Feature Development: 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
April 13, 2018

Chad Leqve  
Metropolitan Airports Commission  
6040 S 28th Ave  
Minneapolis, MN 55450

Re: Lake Elmo Airport Environmental Assessment, Draft EA/EAW

Dear Mr. Leqve:

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:

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.

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.

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.

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,
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:

- **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 30th 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.

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.

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.
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 Kyllo, Board Chair—West Lakeland Township
April 18, 2018

Metropolitan Airports Commission
Attn: Chad Leqve
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

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.

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 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.

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.
• The WCA permitting process will address the avoidance, minimization, and mitigation of the proposed wetland impacts.

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).
• 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.

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
April 19, 2018

Lake Elmo Airport EA/EAWS Comments
c/o MAC Environment Department
6040 28th Avenue South
Minneapolis MN 55450

Re: Washington County Comments on EA/EAWS 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/EAWS 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/EAWS. Washington County Public Works participated in this process which provided a unique opportunity for input – addressing environmental issues prior to completion of the EA/EAWS.
Based on review of the document, we offer the following comments:

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.

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.

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.

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 28th 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
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
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 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
Chad Leqve
Metropolitan Airports Commission
6040 28th 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**

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).
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.

Sincerely,

[Signature]

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)
April 17, 2018

Lake Elmo Airport EA/EAW Comments
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,

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.

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.

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.
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.

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.

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.).

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:

“(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 DEFERING 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).

“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).]

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.

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
Section IV below describe what information is “lacking” and explain why an EIS must be ordered.

IV. ITEMIZED COMMENTS TO EA/EA/EAW

The following comments will show that the Draft EA/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).

Please note: The numbering of the West Lakeland Township’s comments corresponds to the pages and paragraphs in the Draft EA/EA/EAW and its Appendices.

CAVEAT: The absence or omission of my client’s comment on any statement in the Draft EA/EAW shall not be deemed an agreement with, or admission of, the draft EA/EAW statement.

Page 2-2, paragraph 1:

The EA/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 http://www.airnav.com/airport/21D last visited 3/30/18.]

The EA/EA/EAW is inconsistent with the Airnav rating and must be reconciled.

Page 2-2, paragraph 1:

The EA/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:

The EA/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, “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/EA/EAW should explain why MAC did not purchase property on the west side of Manning Avenue to alleviate the incompatibility. The EA/EA/EAW is incomplete without including an analysis of the cost and environmental impacts of this acquisition.
Page 2-4, last paragraph:

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 multipiston 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:

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:

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:

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:

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
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:

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:

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:

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:

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:

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:

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:

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:

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 30th Street to a “major collector” road. The EA/EAW is inadequate by not addressing this change.

Page 3-18, Figure 3-7:

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.

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.

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:

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 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 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.

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 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).]

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.

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: 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: 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 30th St.); and Exhibit 2B (trumpeter swans, located south of 30th St.).]

Page 5-6: 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: 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: 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.)
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.

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:

**“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/.)”

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.”

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.

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.
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/EAWE is inaccurate and incomplete by failing to analyze the impacts of the quality of life for the residents of the area.

Page 5-23:
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/EAWE is inadequate by failing to describe and analyze the sequencing requirements of the Wetland Conservation Act (Minn. Rule 8420.0520 et seq.)

Page 5-25:
Paragraph 5.14.2 states in part, “However, approximately 300,000 square feet of existing impervious surface will also be removed.” The EA/EAWE 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:
Paragraph 5.14.3 references the FEMA floodplain. The realigned section of 30th Street is in 100-year floodplain. The FEMA floodplain map and the Valley Branch Watershed District 100-year floodplain maps differ. The EA/EAWE 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:
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/EAWE is incomplete by failing to discuss the environmental impacts of this storage shed.

Comments to EA/EAWE Appendix

Appendix A – Runway Length Needs Determination

Page A-2:
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/EAWE 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-and-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:

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:

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:

Table 12 contains estimates. The EA/EAW is adequate by failing to provide the data supporting these estimates.

Page A-12:

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:

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:

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
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.

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:

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:

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 that it actually is. The accelerate/stop distance is referenced on this page but if 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 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 which runway an aircraft uses.

Page A-24:

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:

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 – 30th Street North Realignment Alternatives Review

Page 34 (pdf number):
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):

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):

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.

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 to 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:

“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 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.

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
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):

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):

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 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):

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):

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):

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 at Lake Elmo, and the environmental impacts of increased demand.

Page 555 (pdf number):
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 at 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):
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):
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):
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 the aircraft counting method is the same as described in the April 1st St. Paul Pioneer Press.

Appendix L – Public Involvement

Page 1028 (pdf last page):
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 (8th 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.
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.
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 4410.230.G. requires discussion of “reasonable alternatives.” This is a reasonable alternative.

VIII. THE RIGHT TO PROCEDURAL DUE PROCESS.

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.

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. 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.

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.

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 & 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.

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 …”

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.

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

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

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 30th 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

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/EA W 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.

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/EA W, 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

In summary, the draft EA/EA W 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/EA W fails to locate and analyze environmentally superior sites. It leaves many questions unanswered that must be included in the final EIS.

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 Kyllo, 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
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)
April 18, 2018

Lake Elmo Airport EA/EAW Comments
6040 28th Avenue
South Minneapolis, MN 55450

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.
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\(^{13}\) may include unclear taxiway markings, airport signage, and more complex issues such as the runway or taxiway layout.” [Emphasis added.] \(^{13}\) 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
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

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).

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.

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.

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 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.

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.

### Table 1. Road Design Standards

<table>
<thead>
<tr>
<th>Type of Street</th>
<th>Minimum Right-of-Way Width</th>
<th>Minimum Roadway Width</th>
<th>Shoulder Width</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor Arterial</td>
<td>120 feet (36.6m)</td>
<td>24 feet (12.2m)</td>
<td>8 feet</td>
</tr>
<tr>
<td>Collector or Commercial</td>
<td>100 feet (30.5m)</td>
<td>24 feet (12.2m)</td>
<td>4 feet</td>
</tr>
<tr>
<td>- Industrial Street</td>
<td>60 feet (18.3m)</td>
<td>24 feet (12.2m)</td>
<td>4 feet</td>
</tr>
</tbody>
</table>

(West Lakeland Township Performance Standards, Section 8.10.14.1)

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.

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**
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. 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.

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

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

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.

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 $a$

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

<table>
<thead>
<tr>
<th>Management Class</th>
<th>Average Buffer²,³,⁴</th>
<th>Hydrologic Guidelines</th>
</tr>
</thead>
<tbody>
<tr>
<td>A-Preserve</td>
<td>100 feet</td>
<td><strong>Bounce (10-year, 24-hour)</strong>: Existing Inundation² (1- &amp; 2-year, 24-hour): Existing Inundation² (10-year, 24-hour): Existing Runout Control⁶ No Change</td>
</tr>
<tr>
<td></td>
<td>Monuments required marking buffer edge.</td>
<td>Maintain existing hydrology: (The runoff volume flowing into the wetland from a 2-year 24-hour event cannot be changed by more than 10%) Encourage infiltration and reduced impervious BMPs Conduct water budget analysis</td>
</tr>
<tr>
<td>B-Manage 1</td>
<td>75 feet</td>
<td><strong>Bounce (10-year, 24-hour)</strong>: Existing + 0.5 feet Inundation² (1- &amp; 2-year, 24-hour): Existing plus 1 day Inundation² (10-year, 24-hour): Existing + 7 days Runout Control⁶ No Change</td>
</tr>
<tr>
<td></td>
<td>Monuments required marking buffer edge.</td>
<td>Maintain existing hydrology: (The runoff volume flowing into the wetland from a 2-year 24-hour event cannot be changed by more than 10%) Encourage infiltration and reduced impervious BMPs</td>
</tr>
<tr>
<td>C-Manage 2</td>
<td>50 feet</td>
<td><strong>Bounce (10-year, 24-hour)</strong>: Existing + 2.0 feet Inundation² (1- &amp; 2-year, 24-hour): Existing plus 5 days Inundation² (10-year, 24-hour): Existing + 14 days Runout Control⁶ 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%</td>
</tr>
</tbody>
</table>

1. Modified from Minnesota Routine Assessment Method For Evaluating Wetland Functions, Version 3.0 (MNARAM).
2. 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.
3. A minimum 25 foot vegetative buffer strip is required around the delineated wetland boundary or the OHW, whichever is greater in elevation.
4. The average buffer widths listed are within the ranges recommended by MNARAM.
5. Defined as the time period during which wetland water levels are above the outlet elevation following the prescribed storm event.
6. If currently landlocked, new outlet should be above delineated wetland boundary elevation.
7. This is not a guideline of MNARAM, 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
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

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.

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

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.

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

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.”
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
MEMORANDUM

Date: March 14, 2018

To: Dan Kyllo, Town Chair
Cc: Dave Schultz, Road Supervisor
    Carrie Seifert, Town Clerk
From: Ryan Stempski, P.E., Township Engineer

Re: Lake Elmo Airport EA/EAW
    West Lakeland Township, Minnesota

An engineering review has been completed for the proposed realignment of 30th Street and its associated affects.

WEST LAKE LAND 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):
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 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 30th Street North Realignment Alternatives Review. The heavy soils (siltss and clayes) 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 additional responsibility onto West Lakeland that does not exist today.

**Flood Elevation Versus the Proposed Road Alignment:**
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:**
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:**
Environmental impacts to existing wetlands will be commented on by the LGU for this area, which is Valley Branch Watershed District.