



Transportation Committee

Meeting date: June 14, 2010

Council Meeting: June 23, 2010

Business Item
Item: 2010-214

ADVISORY INFORMATION

Date:	June 10, 2010
Subject:	MSP International Airport Long Term Comprehensive Plan
District(s), Member(s):	All
Policy/Legal Reference:	MS 473.146, 473.165
Staff Prepared/Presented:	Arlene McCarthy, Director MTS (651-602-1754) Connie Kozlak, Mgr. Transportation Planning, MTS (651-602-1720) Chauncey Case, Sr. Planner – MTS (651-602-1724)
Division/Department:	Metropolitan Transportation Services (MTS)

Proposed Action

That the Metropolitan Council finds that the Metropolitan Airport Commission’s 2030 Long Term Comprehensive Plan for MSP International Airport is consistent with the Council’s 2030 *Transportation Policy Plan*, if the following issues are addressed in the final plan:

- 1) The LTCP should note that MAC will update the plan every five years and that MAC will budget for this in the appropriate years to ensure that the first update is prepared by 2015.
- 2) MAC should initiate a capacity study two years in advance of when MSP is expected to have 540,000 annual operations and incorporate the results of this study into the following LTCP update.
- 3) MAC should initiate an FAA Part 150 study update (which includes a comprehensive noise analysis and mitigation program), in consultation with the MSP Noise Oversight Committee (NOC), when the forecast level of operations five years into the future exceeds the levels mitigated in the Consent Decree (582,366 annual operations). The results of this study should be incorporated into the first subsequent LTCP Update.
- 4) MAC shall continue to work with all appropriate agencies to implement the Interstate 494/34th Avenue, Trunk Highway 5/Glumack Drive and Trunk Highway 5/Post Road interchange modifications included in the 2030 Concept Plan, including preliminary environmental scoping and analysis. These highway modifications are not currently included in the region’s fiscally-constrained 2030 highway plan.
- 5) The LTCP needs to acknowledge that storm water from MSP detention ponds discharges to the reaches of the Minnesota and Mississippi Rivers that are identified as water-quality impaired for a number of pollutants and stressors.
- 6) The LTCP should include a general discussion of financial assumptions and funding mechanisms available to implement the proposed development.

Background

In 1996 the Long Term Comprehensive Plan (LTCP) for Minneapolis-St. Paul International Airport (MSP) was approved as part of the Major Airport Dual-Track planning process. The Metropolitan Airport Commission (MAC) has prepared a LTCP update that replaces the 2010 Plan and 2020 Concept Plan prepared in 1996, and moves the planning horizon to 2030. On April 19, 2010, the MAC directed its staff to submit this update to the Council for its review and comments, after which MAC will adopt its final LTCP. The MSP LTCP executive summary is attached at the end of TAB Action Transmittal No. 2010-34; the full plan can be viewed at <http://www.msppairport.com/about-msp/long-term-comp-plan.aspx>.

The preferred development alternative for MSP retains its current runway configuration while adding passenger gates, vehicle parking and improved ground access. MSP retains its system role as a *Major* hub-airport facility, which is consistent with the 2030 *Transportation Policy Plan* (TPP). LTCP forecasts indicate a 73% increase in passengers and a 40% increase in operations by 2030.

Rationale

Under MS 473.611 and MS 473.165, the Council reviews the individual LTCP for each airport owned and operated by the MAC for consistency with the Council's metropolitan development guide. Under current TPP policy, airport LTCP's are to be updated every 10 years. LTCP's are used as basic input to the Council's update of the regional aviation system plan and referral reviews including community comprehensive plans.

Funding

This action involves no funding considerations for the Council.

Known Support / Opposition

Preparation of the LTCP by MAC included a public involvement process. Airport users generally support the preferred concept. However, several MSP-area communities indicated to MAC, and also through the TAC/TAB review process, that they are concerned about continuing noise impacts and mitigation.

The attached TAB action transmittal includes the comments received by MAC during the January 20 to February 19, 2010 comment period, MAC's responses to the comments received and the TAB recommendation to the Council.

Also attached to this business item are letters from MSP-area communities sent to TAB and the Metropolitan Council during the recent review of this report (April to June, 2010), letters from MAC and a Met Council letter to Minneapolis.

Review of MSP International Airport LTCP

AUTHORITY

MS 473.611 indicates that an LTCP adopted by the Commission shall be consistent with the development guide of the Council; also, MS 473.165 states that if a plan or any part thereof is inconsistent with the guide the Council may direct the implementation of the plan or such part thereof be indefinitely suspended. The Council has 60 days (until June 23, 2010) to complete this action for this LTCP; if it doesn't take action within that time frame, MAC may implement the plan.

The LTCP serves as the basis for identifying needed projects, maintaining funding eligibility to meet state and federal financial and plan consistency requirements, and to ensure that projects are responsive to system needs and conditions.

BACKGROUND

The MSP 2030 LTCP Update replaces the 2010 LTCP that was approved by the Legislature in 1996 as part of the Major Airport Dual-Track planning process. The focus of that process was to determine where best to provide needed air-transportation capacity, at a new "Replacement" airport or an "Expanded" MSP. The associated 2020 Concept Plan was not approved for development. In 2004 Northwest Airlines (NWA) proposed a 2020 "Vision" for developing its future hub operations at MSP while also accommodating expansion for other airlines.

In 2005, MAC prepared a Draft 2015 Terminal Expansion Environmental Assessment (EA) based essentially on the 2020 "Vision". The Draft EA deleted the Dual-Track 2020 Concept Plan from further planning consideration; however, the EA was withdrawn prior to completion when NWA went into bankruptcy and, as such, the FAA took no action on the EA.

PUBLIC INVOLVEMENT

MAC's preparation of the MSP International Airport 2030 LTCP Update included meetings with the adjacent community representatives, coordination with Hennepin County, meetings with airport users, and public informational meetings for residents living around the airport. A full draft LTCP, defining the preferred alternative, was made available for a 30-day public comment period. Responses received during this comment period and MAC responses were prepared and reviewed by the MAC prior to their adoption of the LTCP and submittal to the Council for review. Further discussions on the LTCP occurred through the Council's Technical Advisory Committee (TAC) and Transportation Advisory Board (TAB) review (see attachment).

EXISTING AIRPORT

MSP is classified in the TPP as a Major Airport providing scheduled air service to the metro area, Greater Minnesota and the Upper Midwest. The airport is 3,400 acres in size, has four paved runways with precision instrumentation and an air traffic control tower. MSP has two passenger terminals, Lindbergh Terminal (recently renamed Terminal 1) with 117 passenger gates and Humphrey Terminal (recently renamed Terminal 2) with 10 passenger gates, two aircraft rescue and fire-fighting stations, air cargo facilities, and airline maintenance facilities. It provides 23,600 parking spaces, primarily in structured parking ramps, with approximately 5,200 privately-owned spaces for air travelers at off-airport locations.

To implement the 2010 LTCP, a new North/South Runway (17/35) was constructed, including land acquisition for safety zones. Both the Lindbergh and Humphrey terminals were expanded and a substantial noise mitigation program of residential insulation was implemented. A joint airport / community zoning board was established for safety zoning with a zoning ordinance subsequently

approved by Mn/DOT. Implementation of the 2010 LTCP is essentially complete except for the noise mitigation program which extends into 2014.

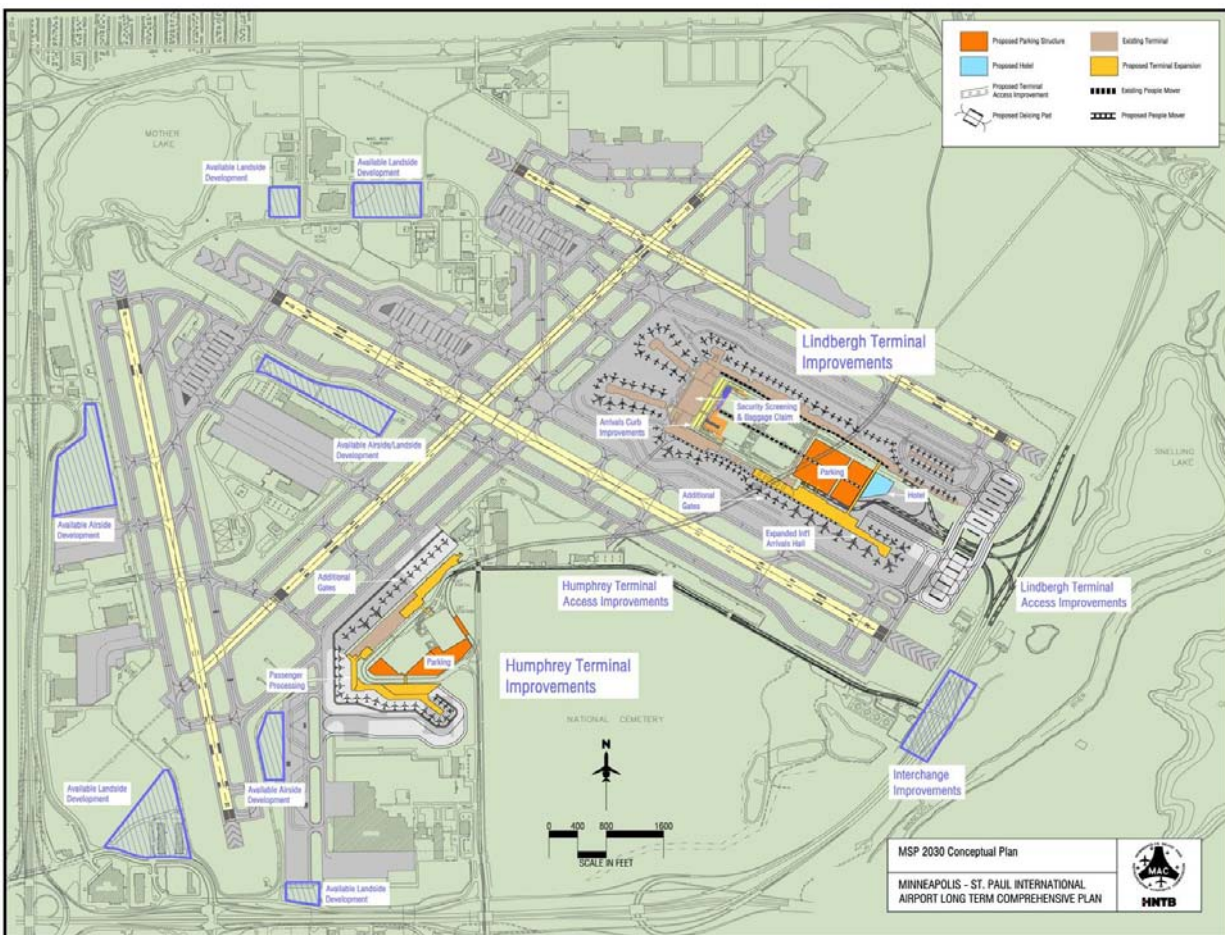
Approximately 32 million passengers used the airport in 2008, with about 450,000 aircraft operations. The historic high for annual operations is more than 540,000 in 2004, and for passengers almost 38 million in 2005. Given the drop in activity in recent years due to the economy, return to these historic levels appears to be a number of years away. The airport is now operating efficiently with reduced activity.

Description of 2030 MSP CONCEPT PLAN

An Executive Summary of the concept plan is the last attachment to the TAB action transmittal.

There have been substantial changes in the airline industry including the acquisition of NWA by Delta Airlines, and entrance of Southwest Airlines into the Twin Cities market. The old NWA main base offices/shops/hangars have been declared surplus and its planned total demolition provides space for new opportunities to expand the Lindbergh Terminal 1 complex. Figure 1 depicts the various development areas on the airport where Phase I-IV projects are planned to occur by 2030, if demand warrants.

Figure 1



Existing Aviation Activity and Future Demand

Forecasting aviation demand is challenging since trips start and end in different cities, so growth is not exclusively tied to local economic and demographic growth. Demand can also be greatly influenced by the airline business practice of channeling passengers through hub airports. MSP has been a hub for many years so much of the activity at MSP is tied to airline business decisions about connecting flights. The aviation forecasts prepared for this plan assume MSP continues as a hub airport with a 73% increase in annual passenger boardings from 16.4 million to 28.4 million, and a 40% increase in annual aircraft operations from 450,000 to 630,000 by 2030. However, air traffic is not expected to return to the 2004-2005 peak activity levels until about 2013 for passenger activity and 2020 for aircraft operations due to general economic conditions and financial difficulties in the airline industry.

Noise impacts are directly related to aircraft activity levels, as well as the types of planes. The LTCP does acknowledge the noise impacts out to the 60 DNL level for 2030 at several locations in the plan. Fig 5-3 shows a 2008 base case noise contour and a 2030 preferred alternative contour. The 2030 contour, in relation to the 2008 contour, is 49% larger for the 65 DNL contour area and 52% larger for 60 DNL. A noise mitigation plan is typically prepared at the environmental assessment (EA) phase and/or via a Part 150 Study; as such, no mitigation plan is included in the LTCP. Reassessment of noise impacts is not envisioned until air traffic is forecasted five years into the future to be over 582,366 annual operations since MAC is currently working on mitigating noise to that level of operations by virtue of the Consent Decree.

Existing Conditions and Future Airside/Landside Facility Needs

The 2030 LTCP indicates that airside capacity is adequate to meet forecast demands and does not propose any new runways or major changes in the airfield configuration. However, some taxiway and air traffic improvements are assumed necessary for efficient aircraft ground movement in the long-term. Changes in the aircraft fleet mix and gate use will be closely monitored to determine if changes in these assumptions are warranted.

The LTCP analysis concluded that the existing passenger terminal/parking complexes and other landside facilities will not be able to accommodate planned forecast growth without expansion. Focus areas were identified where facilities are operating inefficiently today or are expected to operate inefficiently when moderate increases in passenger numbers occur. This analysis resulted in a phased approach to adding improvements in a logical sequence as shown in Table 1. These five year increments are proposed for each phase, but the actual timing of project implementation will be demand driven. Total costs are estimated to be \$2-\$2.5 billion.

Table 1

Phase I	2010-2015	Expand Humphrey Terminal by 16 gates, add parking and <u>relocate non-SkyTeam airlines.*</u>
Phase II	2015-2020	Modernize and expand Lindbergh Terminal including six new gates, a new parking ramp and a new International <u>arrivals facility.</u>
Phase III	2020-2025	Complete Humphrey Terminal expansion by adding 10 Gates; extend Lindbergh Concourse G by 10 gates and <u>add parking and a hotel.</u>
Phase IV	2025-2030	Construct cross-over taxiway, relocate Lindbergh <u>Terminal access road and relocate the post office.</u>

* **SkyTeam Alliance** consists of Delta and its partners, Mesaba, Compass, Pinnacle, Comair, Freedom Air, Sky West, and Atlantic Southeast, plus other international partners.

Non-SkyTeam Airlines providing service at MSP in April 2010 are United/ Continental, Shuttle America, US Airways, Republic, Frontier, Midwest, Continental Express, Chautauqua, Air Canada, American Airlines, Trans State, Southwest, AirTran Airways, Alaska Airlines, Icelandair and Sun Country.

CONSISTENCY WITH AVIATION SYSTEM PLAN and OTHER REGIONAL PLANS

The LTCP maintains MSP as the region's Major Airport for scheduled commercial airlines and air cargo services. The proposed phasing plan allows improvements to be implemented over a twenty-year period in response to projected increases in demand. It also allows implementation of sustainability objectives, and proposed facility improvements, to occur with minimal disruption to the day-to-day operations of a hub airport.

The Concept Plan appears consistent with the region's airspace structure and future capabilities to incorporate planned air traffic improvements. It provides for addressing the various strategies identified in TPP Policy 19 to encourage adequate air transportation services supporting the Region's economy.

The following discussion addresses areas of consistency with the Council's regional plans that have been identified during the review process by communities, TAB and Council staff. Advisory comments are included in a separate section.

The overall 2030 Concept Plan appears feasible, and is recommended for Council approval if the following issues and findings are acknowledged by the Commission prior to final adoption of the LTCP and addressed prior to implementation of the full plan.

1) LTCP Planning Process Cycle

The MSP communities and several individuals/groups have all voiced their interest and need for the MSP LTCP to be updated every five years. Information in the LTCP provides basic input for updating/implementing local comprehensive plans and for city participation in the Commission's *Noise Oversight Committee* (NOC) activities.

Under TPP Policy 22, LTCP's are to be periodically updated, but the MSP LTCP has not been updated for 14 years due to a number of unusual circumstances. The regular, periodic review of LTCP forecasts is an important feature of maintaining the regional and state aviation systems plans. The Dual-Track legislation (MS 473.616) which required a five-year update has been repealed; therefore, staff is proposing that the upcoming TPP Update redefine the overall process and schedule for updating/amending a LTCP to reinstate this five-year cycle, making it be possible for the Council to ensure the 5-year updates occur. There is substantial volatility in many areas of today's economy affecting the aviation industry; since many of these matters are out of MAC's control, there is a need to closely monitor and adjust the plan as needed. Changes to the regional demographic forecasts are expected after the 2010 Census results are known. This timing also would allow LTCP adjustments to reflect any changes that may occur in the Council's regular updates of the TPP, which occur every four years with the next update scheduled for 2014.

Finding: The LTCP should note that MAC will update the plan in 2015. This update should be identified by the Council in the region's unified planning work program (UPWP) and by MAC in its budget to ensure an update is prepared by 2015.

2) Airside Development/ Relationship to Capacity

The Dual-Track process determined that MSP should be expanded with the expectation that it would adequately serve as the region's major air service airport into the foreseeable future. While the FAA has not established a current official capacity for MSP, the Dual-Track process evaluation looked at operation levels as high as 640,000 annual operations with an average 10 minute delay and the 2015 Environmental Assessment evaluated annual operations as high as 720,000. In 2009, annual operations were at 67% of the 640,000 dual-track capacity and at 60% of the 2015 EA capacity. The 2030 LTCP assumes adequate airside capacity through 2030; therefore, no airside capacity alternatives were evaluated.

The surrounding cities have pointed out that FAA capacity guidelines for systems planning state planning for additional capacity should be initiated when an airport's runway system reaches 60% of capacity; when it reaches 75% of capacity, system engineering and funding should be programmed and at 80%, implementation should usually be initiated.

However, other FAA publications do not indicate that planning for additional capacity at MSP is needed immediately. The FAA's *Future Capacity Needs in the National Airspace System, 2004*, uses a 90% (rather than 80%) threshold for implementation of development alternatives in a metro area like the Twin Cities which has a single commercial air-service airport. The FAA's *Future Capacity Needs in the National Airspace System, 2007*, includes a map of major airports nationwide that will need new capacity by 2025. This report does not identify a need for new capacity at MSP before 2025 unless assumed benefits of air traffic control improvements are not implemented and reduced delays at other hub airports do not occur.

The five-year continuous decline in actual level of MSP operations from the historic high that occurred in 2004, as well as the current poor performance of the U.S. economy and projected slow growth of operations in the short-term, also indicates that evaluations of future development alternatives do not need to begin immediately.

Finding: Based upon the forecasts and factors described above, the region needs to closely monitor usage of runway capacity and conduct various analyses to position itself by 2020 for a potential mid-course correction to the 2030 plan, if it is needed. MAC should initiate a capacity study two years in advance of when MSP is expected to have 540,000 annual operations, the historic high level of airport operations in 2004.

3) Aircraft Noise

The environmental effects of aircraft noise at MSP have been a concern since the first jet service in 1961. Noise impacts were so severe that relocation of the airport was studied in the 1960s (Ham Lake) and again in the 1990s (Dakota County). Aircraft engine noise reduction efforts by the manufacturers have had a significant effect on offsetting noise from increased aircraft operations over the years. Noise abatement and mitigation efforts have been in effect at MSP for decades

Title 14 of the Code of Federal Regulations (CFR) relates to *Airport Noise Compatibility Planning*. 14 CFR Part 150 sets forth standards for airport operators to use in documenting aircraft noise exposure and establishing programs to minimize noise impacts based on a five-year forecast of operations. A Part 150 study is a comprehensive analysis of noise impacts and mitigation and is the appropriate mechanism to address the quantification and mitigation of airport noise in a manner that is consistent with past practices at MSP, and the federal guidance on such activities. The issue of mitigation in the 60 DNL is not a project-specific question, but rather an overarching noise policy question, which is what the Part 150 process is intended to address. Part 150 regulations recognize 65 DNL as a threshold for noise impact and related mitigation. However, as was detailed in the Draft 2001 and 2004 MSP Part 150 Update documents, this does not preclude Part 150 sponsors from building a case for a mitigation program out to the 60 DNL noise contour around an airport as part of the Part 150 planning process.

Some cities around MSP believe that 60 DNL has been established as a regional standard for airport noise mitigation. The Consent Decree that settled a lawsuit between MAC and several cities adjacent to MSP specifically provides that "The parties do not intend anything in this consent decree to create or constitute any environmental standard, limitation, rule, order, license, stipulation agreement, or permit within the meaning of the Minnesota Environmental Rights Act, Minn. Stat.116B.02, Subd. 5."

In 2004 MAC prepared a Part 150 noise mitigation program for MSP, based on 582,366 annual operations, which included both preventive and corrective land-use and operational measures to improve compatibility between the airport and its neighbors. Although this document was never approved by the FAA, it established the noise mitigation eligibility area for a settlement of litigation that was brought

against MAC by the cities of Minneapolis, Eagan and Richfield over the mitigation package in the 64-60 DNL noise contours around MSP. The resulting mitigation program, which will continue to be implemented until 2014, is currently funding residential insulation in MSP communities. To date, MAC has spent \$417 million on mitigation in this area. This includes funds spent in the 60-64 DNL contour area, as stipulated in the Consent Decree settlement of the lawsuit between the MAC and adjacent communities as well as the Part 150 mitigation to 65 DNL.

The cities surrounding MSP are concerned that the 2030 unconstrained forecast activity would result in a larger 60 DNL contour. TAB recommended that MAC should acknowledge noise impacts and outline a mitigation plan. The LTCP acknowledges the noise issue, but does not identify any next steps concerning mitigation.

TPP Policy 25 indicates that airport/community land uses should be compatible with the role and function of the airport, while planning, operation, and development of the region's aviation facilities must be conducted to minimize impacts upon the cultural and natural environment, regional systems and airport communities.

Finding: Given expected changes in aircraft fleet mix, NextGen air traffic control improvements/procedures, and on-going traffic impacts, the request by MSP-area communities for an update to the FAA Part 150 study appears warranted. A Part 150 study conducted immediately would not be useful as current operations are 26% lower than the 2005-2007 operations used for the last Part 150 study which established the eligibility area for noise mitigation under the Consent Decree. As such, MAC should initiate an FAA Part 150 study update, in consultation with the MSP Noise Oversight Committee (NOC), when the forecast level of operations five years into the future exceeds the levels mitigated in the Consent Decree (582,366 annual operations). The results of this study should be incorporated into the first subsequent LTCP Update.

4) Ground Access

MSP airport is well served by transit, with two Hiawatha LRT stations. An intermodal bus terminal is connected to both the Lindbergh LRT station and the people mover to the Lindbergh terminal via escalator/elevator. Primary freight access to the airport is provided by the TH 77/66th St interchange, which was upgraded when most of the freight areas were relocated during implementation of the 2010 LTCP. Pedestrians and bicycles can access the Humphrey terminal (Terminal 2) via 34th Ave and its adjacent sidewalk and the Lindbergh terminal via LRT from either Humphrey/34th or the Fort Snelling station.

Roadway access is primarily from principal arterial freeways (494, TH 5, TH 62 and TH 77) which bound the airport. The 2030 LTCP has identified potential roadway improvement needs at TH 5/Post Road, I-494/34th Ave. South and at the TH 5/Glumack Drive interchanges after 2015. The major improvements are not expected until post-2020.

Lindbergh (Terminal 1) - Over 10,000 more structured parking spaces are expected by 2030. The projected roadway activity, along with expansion of concourses G - H and potential crossover taxiway will require demolition of the remaining old NWA main base buildings and relocation and replacement of the main entry road to the terminal complex (Glumack Drive), including relocation of the TH 5 interchange.

Humphrey (Terminal 2) - An additional 5,900 structured parking spaces are proposed. Access to the terminal complex is to be provided by both Post Road and 34th Avenue South. However, the existing roadways lack the capacity to handle the anticipated traffic volumes. The concept proposed for improving this condition is to route all inbound traffic on Post Road and all outbound traffic on 34th Avenue.

Initial estimates of overall roadway project costs are:

- Phase I Humphrey Complex Roadway Modifications \$26 - \$ 31 million
(I-494/34th Avenue interchange)
 - Phase II Humphrey Terminal Road Access Improvements \$81 - \$ 95 million
(including TH 5/Post Road)
 - Phase II Lindbergh Terminal inbound/outbound roadway \$144 - \$169 million
- Total \$251- \$295 million

Very little documentation on these improvements is included in the LTCP. There appear to be traffic modeling and roadway design issues such as redirected traffic volumes on Post Road, interchange spacing at all three interchanges, increased weaving conditions and LRT operational considerations which need coordination and review, as well as identification of funding sources. Proposed reduction in off-airport parking will also impact traffic on these roadways. The Bloomington South Loop Plan is also nearing completion and the LTCP work should be further defined so planning and programming issues at the I-494/34th Avenue South highway interchange which serves both areas can be addressed together.

TPP Policy 11 indicates that the metro highway system will be managed and improved to provide for maximum person throughput, safety and mobility using existing facility capacity, pavement and rights-of-way where feasible. Strategy 11e specifically states “New or reconstructed trunk highway interchanges to expand capacity or meet safety concerns will be considered only if they are consistent with this policy plan (Appendix E) and Mn/DOT’s criteria and cost-sharing policies. All preliminary roadway improvements will require further discussion with Mn/DOT and the Council regarding location, potential design, cost and potential environmental effects.”

It is not clear in the LTCP that other capacity or traffic management alternatives, interim or long-term, were considered. MAC has initiated discussions with Mn/DOT to address and coordinate ground access to the airport. Clarification of these projects is important given the long lead time for highway design and construction and the need to resolve funding issues.

Finding: MAC shall continue to work with all appropriate agencies to implement the Interstate 494/34th Avenue, Trunk Highway 5/Glumack Drive and Trunk Highway 5/Post Road interchange modifications included in the 2030 Concept Plan, including preliminary environmental scoping and analysis. These highway modifications are not currently included in the region’s fiscally-constrained 2030 highway plan.

5) Water Quality and Wetlands - Jim Larsen 602-1159

The LTCP document indicates that storm water runoff from nearly all of MSP is directed to one of three stormwater detention pond systems that ultimately discharge into the Minnesota River. The plan needs to be revised to acknowledge that this reach of the Minnesota River, as well as the receiving reach of the Mississippi River immediately downstream from MSP into which the Minnesota flows, are identified as water-quality impaired for a number of pollutants and stressors.

Ongoing and scheduled Total Maximum Daily Load (TMDL) pollution reduction studies are targeted for completion during the planning period. The TMDL process identifies all sources of the pollutants, and makes a determination of how much of a reduction in each source’s pollutant contribution must take place in order for water quality standards to be met in that stream reach. The source reduction strategies are utilized to prepare an implementation plan, which may result in the need for the MAC to plan and execute projects during the planning period to further reduce pollutants originating from MSP. TMDL implementation plan pollutant reduction strategies will likely be tied to future updates of MSP’s National Pollutant Discharge Elimination System permit(s).

Finding: The LTCP needs to acknowledge that storm water from MSP detention ponds discharges to the reaches of the Minnesota and Mississippi Rivers that are identified as water-quality impaired for a number of pollutants and stressors.

6) Financial Feasibility

Monitoring of need versus costs and the potential for overinvestment is critical in establishing long-term economic sustainability of the airport. The merger of United/Continental, resulting in Continental leaving the SkyTeam Alliance, and the recent entry of Southwest Airlines to MSP are reflective of domestic service and alliance dynamics in airline industry. These dynamics present a challenge in estimating revenues and costs. The desire for minimizing delays and providing an adequate facility to optimize economic growth of the region and state needs to be balanced against the possibility of overinvestment due to changing airline business practices (such as downsizing the hub operations) which would result in insufficient revenue to pay back expenditures.

TPP Policy 26 indicates that adequate aviation resources should be identified and available to meet the forecasted needs and ability of the region. Through the phasing process, the LTCP preferred alternative appears to recognize the need to keep the airport viable and tying improvements to the timing when they are needed, but is less clear about the area's ability to support the investments over time.

The phased program is consistent with TPP Policy 22 concerning transitioning of airport development plans and limits potential for over-or-under investment. The ability to fund the development is not discussed as the LTCP includes only order-of-magnitude costs and no financial information on funding sources.

Finding: The LTCP should include a general discussion of financial assumptions and funding mechanisms available to implement the proposed development.

ADVISORY COMMENTS

Socio-Economic Forecasts - Todd Graham 602-1322

The socio-economic forecast content of the LTCP appears complete. MAC discusses “a hybrid forecast that incorporates the strengths and minimizes the weaknesses of the two data sources” (Metropolitan Council's forecast and Woods & Poole Economics' forecast for the seven counties). MAC's hybrid forecast projects *slightly higher regional population* in 2030 than Metropolitan Council, and *substantially higher regional employment* in all years: 23% higher in 2000, 23% higher in 2010, 30% higher in 2020, and 39% higher in 2030.

However, Council staff does not consider the regional population discrepancy to be problematic. MAC's forecast of 3,744,000 people in 2030 is reasonable given the benefit of more timely data inputs and current thinking in the demography profession such as hypotheses of slightly higher birth rates and longer life expectancies.

Council staff concluded that the employment forecast discrepancy is mostly a difference in employment metrics. In the past, the Council has defined employment in a limited way, counting or forecasting only wage and salary jobs. Most other forecast model sources – notably REMI, Global Insight, Minnesota Department of Finance, US Bureau of Economic Analysis, and Woods & Poole – define employment broadly, counting wage and salary jobs, as well as business owners and self-employed persons. As a result, their employment forecasts are substantially higher.

The Council is currently implementing new forecast modeling tools and expects to issue major forecast revisions in 2012. In the meantime, the MAC forecast is considered a reasonable and acceptable basis for airports planning and the inconsistency with Council's published forecasts is acceptable.

MTS staff has also noted that this difference in Council and MAC forecasts, with the fact that MAC's forecast is the higher, demonstrates the uncertainty in the forecast and corresponding future capacity demand at MSP.

Sanitary Sewer and Water - *Roger Janzig 602-1119*

The Metropolitan Disposal System has adequate capacity to serve the proposed increased flow from the Airport during non-wet weather periods. The City of Minneapolis has been identified as a community having excess wet-weather related wastewater flows. The City, partly in response to the Council Regional I/I Mitigation Program, is identifying and reducing wet-weather related flow discharges to the Metropolitan Disposal System. As these sources are eliminated, additional capacity will also be made available during wet weather for Minneapolis, those communities located upstream of Minneapolis and the airport.

There are two statements in the LTCP that should be corrected as follows. The LTCP incorrectly identifies an option for Bloomington to divert wastewater discharges through the Richfield sanitary sewer system. The document indicates that since Bloomington's use of this diversion is "unlikely", additional capacity in the system would be available for Richfield/MAC. However, the system diversion through the Richfield system was abandoned, and portions removed, some years ago so it is not available. The LTCP also indicates that current system improvements to the Metropolitan Disposal System in Richfield will result in additional regional wastewater conveyance capacity. It should be noted that this increase in capacity will be utilized by both Richfield and Edina who are also served through this portion of the MDS.

Parks and Open Space - *Jan Youngquist 602-1029*

Chapter 6 of the MSP LTCP describes the anticipated impacts to surrounding areas, including the expansion of the noise zones. Figure 6-4 depicts the anticipated 2030 Preferred Alternative DNL noise contours, which indicate the following impacts to Federal, State and regional parks:

- An increase of the 70 DNL noise contour over Fort Snelling State Park and the Minnesota Valley National Wildlife Refuge (NWR) (Noise Zone 2)
- A significant increase of the 65 DNL noise contour over Nokomis-Hiawatha Regional Park and the Long Meadow Lake portion of the Minnesota Valley NWR (Noise Zone 3)
- A significant increase of the 60 DNL noise contour over Nokomis-Hiawatha Regional Park, Minnehaha Parkway Regional Trail, the Lake Harriet portion of the Minneapolis Chain of Lakes Regional Park and Fort Snelling State Park (Noise Zone 4)

These noise zone expansions will negatively impact the recreational experience for park visitors so during the environmental process, MAC should examine ways to mitigate these parks and open spaces from the adverse impacts of airport operations.

Chapter 6 also describes the land use restrictions associated with Safety Zones A, B, and C (page 162-163). Figure 6-1 includes a map showing the limits of Safety Zones A and B which impact Nokomis-Hiawatha Regional Park, Minnehaha Regional Park, Hidden Falls-Crosby Farm Regional Park, Fort Snelling State Park, and the Minnesota Valley NWR. Although Safety Zone C is described in the text, it is not included on the map. It is assumed that Safety Zone C will also impact these regional parks system facilities. Safety Zone C restrictions limit the height of structures within the zone to 150 feet above the primary surface at the airport. These restrictions should not cause issue for these parks, since the parks are at a significantly lower elevation than the airport and do not have tall structures planned. Regardless, Council staff recommends that the Safety Zone C area be added to Figure 6-1.

Transportation Advisory Board

of the Metropolitan Council of the Twin Cities

Bill Hargis
Acting Chair

June 4, 2010

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Peter Bell, Chair
Metropolitan Council
390 Robert Street No.
St. Paul, MN 55101

Mr. Bell,

On May 19, 2010, the Transportation Advisory Board voted to recommend approval of the MSP Airport 2030 Long Term Comprehensive Plan.

Municipal Officials

Dick Swanson
Blaine City Council

Steve Lampi
Mayor of Brooklyn Park

Bethany Tjornhom
Chanhassen City Council

Dan Gustafson
Burnsville City Council

Julia Whalen
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James Hovland
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Becky Petryk
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Robert Lillgren
Minneapolis City Council

Russ Stark
St. Paul City Council

William Hargis
Mayor of Woodbury

The TAB discussed the LTCP at length and forwards the recommendation to approve the Plan with three additional recommendations.

The TAB forwards this action and the additional recommendations recorded in the motion to the Metropolitan Council along with additional information about the MSP Airport LTCP in TAB action transmittal 2010-34.

Sincerely,



Bill Hargis, Acting Chair
Transportation Advisory Board

Citizen Members - Precinct

Andrew Reinhardt - A
Thomas Heffelfinger - B

James Meyers - C
Chuck Haik - D

Bart Ward - E
Donn Wiski - F

Jill Smith - G

Ken Johnson - H

Agency Representatives

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Lisa Pellen
M.A.C.

David Thomson
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Modal Representatives

Richard Mussell
Transit

Matthew Craig
Transit

Ron Have
Freight

David Gepner
Non-motorized

Transportation Advisory Board
of the Metropolitan Council of the Twin Cities

ACTION TRANSMITTAL

No. 2010-34

DATE: May 20, 2010
TO: Metropolitan Council
FROM: Transportation Advisory Board
SUBJECT: MSP International Airport Long Term Comprehensive Plan Review.

MOTION: The Transportation Advisory Board recommended approval of the preferred development alternative defined in the Long Term Comprehensive Plan (LTCP) for Minneapolis-St. Paul International Airport (MSP) to the Metropolitan Council with the following three additional recommendations:

1. That the MAC review and update the MSP Airport LTCP every five years.
2. That the MAC will cooperate with the Metropolitan Council in evaluating alternative solutions to future airport capacity needs when the requirement to do so is identified by the Metropolitan Council.
3. Direct the MAC to acknowledge noise impacts and outline a mitigation program.

BACKGROUND AND PURPOSE OF REVIEW: The Metropolitan Airports Commission (MAC) periodically updates the long-term comprehensive development plans, as defined in the TPP, for each airport it owns/operates. The LTCP is to be consistent with the Metro Development Framework and the Transportation Policy Plan (TPP). The MAC has completed the 2030 LTCP Update for MSP International Airport, selected a preferred development alternative, provided for public input, and has submitted it for Council review as required under MS 473.165. The LTCP is reviewed for adequacy of evaluations involving airport airside, landside and environmental development/mitigation within the context of conformity with local and regional plans, and consistency with regional policies, guidelines and criteria. Recommendations from the TAC/TAB review process on the MSP LTCP Update will be included in the final staff report for the Council's Transportation Committee and Council action.

The Aviation Task Force discussion checklist, copies of the public comments with responses from the MAC and the Executive Summary of the MSP LTCP are attached. To read the entire MSP LTCP, please copy this link into your web browser.
<http://www.msairport.com/about-msp/long-term-comp-plan.aspx>

The TAB discussed comments and concerns raised by citizens and during the public involvement process conducted by the MAC in developing the draft LTCP. These comments were included with the Executive Summary, and within letters forwarded to the Board from Minneapolis, Eagan, Richfield and Bloomington. The TAB recommends approval of the MSP Airport LTCP with three additional recommendations listed above.

ROUTING

TO	ACTION REQUESTED	DATE COMPLETED
TAC Aviation Technical Task Force	Review & Recommend	April 27, 2010
Technical Advisory Committee	Review & Recommend	May 5, 2010
TAB Policy Committee	Review & Recommend	May 13, 2010
Transportation Advisory Board	Review & Recommend	May 19, 2010
Metropolitan Council	Approval	

390 Robert Street North St. Paul, Minnesota (651) 602-1728 Fax (651) 602-1739

**MSP INTERNATIONAL AIRPORT
LONG-TERM COMPREHENSIVE PLAN (LTCP)**

Review Process

The TAC/TAB and Council staff are reviewing the LTCP for the MSP International Airport concurrently. The staff will review the LTCP in the context of policies, guidelines and criteria to determine conformity and consistency with the TPP and the Metro Development Framework. For the TAC Aviation Advisory Task Force the following LTCP content outline was used as a checklist to focus on several key questions/concerns raised by others and considered for discussion (bold text).

PLAN ELEMENT / CATEGORY	COMMENT
Inventory	Other Information Sources Appendix C : Costs Back-up
Forecasts <ul style="list-style-type: none"> - Socio-Economic - Historical Activity/Current Trends - General Forecast Assumptions - Domestic Passenger Forecast - International Passenger Forecast - Charter Enplanements/Operations - Air Cargo/Operations - General Aviation & Military - Forecast Scenarios 	Concern with level of capital investment.
Facility Requirements <ul style="list-style-type: none"> - Gates - Two Terminal System - Airside Requirements - Airfield Capacity & Delay - Terminal Requirements - Landside Requirements - Roadway Access - Parking Requirements - Rental Car Requirements - Ground Transportation Center - Lighting & Navigational Aids - Security Requirements - Utility Requirements - Obstruction Related Requirements 	Relies on technology/operational improvements. What is capacity threshold? Where needed; how to be provided?
Development Alternatives <ul style="list-style-type: none"> - Airfield - Terminal - Landside & Ground Transportation - Preferred Alternative 	
Environmental Considerations <ul style="list-style-type: none"> - Aircraft Noise - Air Quality - Sanitary Sewer & Water - Water Quality - Wetlands 	MSP communities want current mitigation program to be continued.
Land Use Compatibility <ul style="list-style-type: none"> - Noise Guidelines - Safety Zoning 	
Facility Implementation <ul style="list-style-type: none"> - Phasing Strategy - Cost Estimates 	

MEMORANDUM

ITEM 8

TO: Finance, Development and Environment Committee

FROM: Dennis Probst, Deputy Executive Director – Planning and Environment (612-726-8189).

SUBJECT: MINNEAPOLIS-ST. PAUL INTERNATIONAL AIRPORT (MSP) LONG TERM COMPREHENSIVE PLAN (LTCP) UPDATE – AUTHORITY TO SUBMIT TO THE METROPOLITAN COUNCIL FOR REVIEW

DATE: March 30, 2010

In January 2010, the Commission authorized staff to finalize the draft Long Term Comprehensive Plan with the recommendations as proposed by MAC staff. The draft document was published and made available for public review and comment. The comment period extended from January 20, 2010 through February 19, 2010. Five letters and one e-mail were received, and are attached to this memo with responses from MAC. The letters received were from the City of Bloomington, City of Eagan, City of Mendota Heights, City of Minneapolis, and the City of Richfield. The e-mail was received from a St. Paul resident.

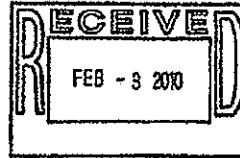
The letters received and responses will be incorporated into the document, along with some minor text changes, and a revised LTCP document produced. Staff is requesting the authority to then submit the document to the Metropolitan Council for their review.

The Met Council has a 60-day review timeframe. As a part of their review, the Met Council will notify the adjacent communities of their process and schedule. Once Met Council staff completes their review and report, the item will be brought to their Transportation Advisory Board, Transportation Committee and the full Metropolitan Council.

Once the Metropolitan Council has completed their action, staff will return to the Commission with a request to adopt the new Long Term Comprehensive Plan for MSP.

COMMITTEE ACTION REQUESTED

RECOMMEND TO THE FULL COMMISSION THAT THE LONG TERM COMPREHENSIVE PLAN FOR THE MINNEAPOLIS-ST. PAUL INTERNATIONAL AIRPORT BE SUBMITTED TO THE METROPOLITAN COUNCIL FOR REVIEW.



February 1, 2010

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

Re: Draft MSP 2030 Long Term Comprehensive Plan

Dear Ms. Felger:

The City of Bloomington appreciates the opportunity to comment on the draft of the MSP 2030 Long Term Comprehensive Plan (LTCP). On February 1, 2010, the Bloomington City Council approved the following comments.

Humphrey Terminal Expansion – Traffic Impacts on 34th Avenue

1 The draft LTCP anticipates expanding the Humphrey Terminal in two phases from 10 gates to 27 gates in 2015 and again to 37 gates by 2025. All non-Sky Team airlines are proposed to move from the Lindbergh Terminal to the Humphrey Terminal in 2015. This Humphrey Terminal expansion will increase traffic volumes on 34th Avenue and Post Road and require significant improvements to the 34th Avenue interchange with I-494. The draft LTCP anticipates the Metropolitan Airports Commission (MAC) funding \$31 million in improvements for 34th Avenue and \$95 million in improvements for Post Road.

Based on information presented in the *2015 MSP Terminal Expansion Project Environmental Assessment*, Bloomington understands that completing the Humphrey Terminal expansion prior to major improvements at the 34th Avenue/I-494 interchange would lead to “unacceptable” traffic conditions at the interchange. Bloomington therefore commends MAC for incorporating plans and proposed funding to improve the interchange. Given the challenges of having the improvements in place by 2015, the City is ready to work quickly and cooperatively with MAC and Mn/DOT to design the improvements and agree on an overall funding package.

Noise Impacts

2 The draft LTCP forecasts 40% growth in annual aircraft operations by 2030, from 450,000 to 630,000. Based on the increased operations, the draft plan includes 2030 projected noise contours (Figure 5-4). These projected 60 DNL noise contours depict noise levels in portions of Bloomington and other communities extending beyond blocks that qualified for noise mitigation funds in the past.

MAC has a history of proactively addressing noise impacts on residential areas through noise mitigation programs. However, the draft LTCP does not discuss additional residential noise

MAYOR AND CITY MANAGER
1800 W. OLD SHAKOPEE ROAD, BLOOMINGTON MN 55431-3027
PH 952-563-8780 FAX 952-563-8754 TTY 952-563-8740

AN AFFIRMATIVE ACTION/EQUAL
OPPORTUNITIES EMPLOYER

Ms. Jenn Felger
February 1, 2010
Page 2 of 2


2 mitigation, nor does it call out any MAC expenditures for noise mitigation through 2030. Bloomington believes that increased noise impacts need to be mitigated and strongly recommends that the final version of the LTCP outline a noise mitigation approach that would apply to newly impacted blocks.

Sustainability Initiatives

3 The first three stated goals of the draft LTCP discuss environmentally friendly facilities, improved energy efficiencies and increased use of public transportation, all of which the City of Bloomington strongly supports. As we have previously discussed, Bloomington is currently preparing plans for the South Loop District on MSP's southern border. The South Loop District Plan will focus on a variety of sustainability initiatives. Given our mutually shared goals, adjacent sites and similar plans, there are opportunities to work cooperatively on various sustainability initiatives, including district energy and shared parking during peak demand periods. Bloomington looks forward to additional discussion on these and other mutually beneficial projects.

Thank you in advance for consideration of Bloomington's comments. Should you have any questions regarding this letter, please contact Larry Lee, Community Development Director, at (952) 563-8947.

Sincerely,



Gene Winstead
Mayor

Copy: Lisa Peilen, Metropolitan Airports Commission
Dennis Probst, Metropolitan Airports Commission



City of Mendota Heights

February 16, 2010

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

Dear Ms. Felger:

Thank you for the chance to review and comment on the Draft MSP 2030 Long Term Comprehensive Plan (LTCP). The City of Mendota Heights recognizes MSP as a significant contributor to the economic viability of the Minneapolis/St. Paul metropolitan area. As a community adjacent to the airport, we support these planning efforts as a means for us to better oversee land use and development within our own borders.

The City of Mendota Heights has the following comments regarding the Draft LTCP:

Planning for Capacity:

4 The LTCP forecasts operations up to 98.5% of estimated airfield capacity. Airport planning guidelines suggest that planning for an additional runway or supplemental airport should occur when an airport reaches 60-75% of capacity. The City of Mendota Heights requests that the LTCP include some framework for what the ongoing process for capacity planning would look like.

5 The City of Mendota Heights questions investing up to \$2.4 Billion (on top of \$3 Billion invested in the 2010 program) as the best use of resources. At best, the outcome can only be an airport functioning at full capacity with no plan or vision to address the congestion this will create.

Noise Contours:

The City of Mendota Heights is in compliance with recommendations for local government found in Chapter 6: Land Use Compatibility. The City relies upon accurate noise contour information to make land use decisions.

6 The noise contour presented at the January 20, 2010 Noise Oversight Committee meeting shows significant changes from the current noise contour. We regret the fact that this contour was not presented at the MAC presentation to our City Council. The City of Mendota Heights encourages the regular and accurate review of the noise contours.

Regional Impacts:

7 The LTCP does not address regional impacts upon infrastructure. The plan forecasts increases in airport usage, but makes no mention of traffic volumes for roadways in and out of the airport.

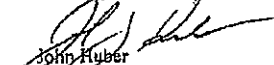
7 | The City of Mendota Heights requests that current and forecasted traffic volumes on roadways be included in the plan.

Third Parallel Runway:

8 | The City of Mendota Heights would like to take this opportunity to restate our strong opposition to any consideration of a third parallel runway at MSP Airport. Our community has been guided and developed around the current configuration of the airport. A third parallel runway would be in direct conflict to the long held and well established vision of this community.

Thank you for your consideration of this matter, please contact David McKnight, City Administrator at (651) 452-1850 with questions you may have.

Sincerely,


John Huber
Mayor

Copy: Senator James Metzen
Representative Rick Hansen
John McDonald, Metropolitan Airports Commission
Richard Aguilar, Metropolitan Council



City of Eagan



Mike Maguire
Mayor

Paul Balken
Cyndee Fields
Gary Hansen
Meg Tibley
Council Members

Thomas Hedges
City Administrator

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651.454.8535 TDD

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The Lone Oak Tree
The symbol of
strength and growth
in our community.

February 16, 2010

Ms. Jenn Felger
MAC Planning and Environment
6040 28th Avenue South
Minneapolis, MN 55450

Dear Ms. Felger:

Thank you for the opportunity to comment on the proposed 2030 MSP Long Term Comprehensive Plan (LTCP). The Eagan City Council, per the recommendation of the Eagan Airport Relations Commission, approved the following comments at the February 16, 2010 City Council meeting.

Noise Impacts

The draft LTCP forecasts 40% growth in annual aircraft operations by 2030, from 450,000 to 630,000 operations. Based on the increase in operations, the draft plan includes 2030 projected noise contours (Figure 5-4). These projected 60 DNL noise contours depict noise levels in portions of Eagan and other communities extending well beyond blocks that have previously qualified for noise mitigation funds.

The Metropolitan Airports Commission (MAC) has a history of proactively addressing noise impacts on residential area through noise mitigation programs. However, the draft LTCP does not discuss additional residential noise mitigation, nor does it state MAC's anticipated expenditures towards noise mitigation through 2030. According to the LTCP projections, an additional 536 single and multi family homes in Eagan would be added to the 60-64 DNL contours. Given the dramatic increase to the noise contours over southwest Eagan, which is made up of predominately residential homes that were built well before the decision was made to build Runway 17/35, the City of Eagan strongly recommends that the final version of the LTCP outline a noise mitigation approach that would apply to all newly impacted blocks. Specifically, the City advocates that those homes being added to the 60-64 DNL contours receive, at minimum, the same level of noise mitigation as those homes that received mitigation under the 2007 legal settlement (with an adjusted funding allocation per the CPI).

11 Moreover, the City of Eagan has understandable concerns with the extension of the noise
12 contours, and corresponding increase in operations, using Runway 17/35. This concern is
13 exacerbated when the noise contours over the Eagan/Mendota Heights Corridor are
proposed to shrink significantly. How and why is it that the contour "lobe" is proposed to
increase so dramatically off of 17/35, while decreasing over the Corridor? Is the proposed
contour extension over southwest Eagan a direct result of additional gates being added to
the Humphrey Terminal? Additionally, Figure 5.9 shows that projected runway use in
2030 calls for Runway 17 to be used for 30.3% of all departures, the highest percentage
of all runways. Furthermore, Runway 17 is proposed to be used for 25.6% of all
nighttime departures, which well exceeds the forecasted use of both 12L and 12R. These
projections directly conflict with the approved Runway Use System (RUS) at MSP,
which calls for the parallel runways to serve as the first priority for both day and evening
departure operations. How will the MAC address this conflict between the 2030 runway
use projections and the approved RUS?

14 While the residents living in and around the Corridor would undoubtedly appreciate noise
relief, the City of Eagan has taken the long held public policy decision to plan and guide
the Eagan/Mendota Heights Corridor for noise compatible uses. Furthermore, the legal
settlement in 2007 ensured that those residents living in and around the Corridor received
the noise mitigation they deserved. As such, Eagan strongly encourages the MAC to
work with the FAA in the coming years to ensure that the RUS is adhered to and the
Corridor is used to the greatest extent possible so as not to place undue burden on the
predominately residential areas of Eagan, including those homes under the flight paths of
17/35.

15 During discussions with the Noise Oversight Committee regarding the LTCP, MAC staff
16 communicated their intent to revisit the LTCP operational forecasts and corresponding
noise contours in five years (2015) in hopes that the economy and airline industry will
have stabilized at that point so as to provide a more accurate forecast. The City of Eagan
recognizes that forecasts are difficult during this time of economic upheaval, and will
anticipate a thorough review of the operations and contours in five years, or as soon as
the economy and airline industry stabilize. Once that stabilization has occurred, the City
asks that the MAC undergo a formal Part 150 process to ensure that the noise
environment and corresponding noise mitigation program can be evaluated accordingly.

Land Use

In light of the proposed 2030 contours included in the LTCP, the City of Eagan reviewed its own Comprehensive Guide Plan, and specifically the City's Noise Attenuation Construction ordinance.

17

The City of Eagan has adopted land use policies through its Comprehensive Guide Plan and construction regulations through its zoning code to minimize the introduction of substantial new areas of noise sensitive uses within the 2008 Policy Contours and to require sound attenuation construction practices where appropriate. The City cannot implement modifications of the Policy Contours unless and until the Metropolitan Council takes action in that regard. The City will monitor the Met Council review of the MSP LTCP and revisit these topics as may be necessary once that review has been completed.

Airfield Capacity

The LTCP states that the existing four-runway airfield configuration is expected to be able to continue operating in a safe and efficient manner without the need for additional runways.

18

According to the operation projections in the LTCP, there were over 450,000 operations in 2008. Airport planning guidelines (FAA Order 5090.3c) state that an additional runway or supplemental airport planning process begins when the airfield reaches 60-75% of annual capacity, which is a threshold that would be reached at MSP when operations exceed 480,000 operations per year. Additionally, statements have been made to lead communities to believe that congestion levels at MSP Airport are on track to exceed delay levels of 10 minutes per operation. In light of the operation levels being predicted for MSP out to 2030, at what point will the MAC address airfield capacity concerns, and is there is a optimum size or activity level for MSP? Additionally, what considerations have been made in the long term planning process regarding the possibility for the construction of a 3rd parallel runway?

19

MSP Infrastructure

The City of Eagan very much appreciates the ongoing commitment the MAC has made to improve the infrastructure at MSP Airport. Eagan continues to support the efforts of the MAC to strengthen the presence of MSP Airport through improvements to its facilities, parking structures, and transportation system. As an employment and transportation hub, Eagan stands to benefit significantly from an economic development standpoint, and

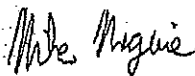
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20

encourages the MAC to continue reinvesting in MSP Airport. Furthermore, as the City promotes its goal of reducing energy and promoting environmental sustainability, we encourage the MAC to continue its efforts to utilize sustainable building practices as expansion and reinvestment plans for MSP take shape.

Again, thank you for the opportunity to comment on the proposed 2030 LTCP. Should you have any questions about the comments made by the City of Eagan, please feel free to contact Dianne Miller, Assistant to the City Administrator, at 651/675-5014.

Sincerely,



Mike Maguire
Mayor

cc: Eagan's Legislative Delegation
Dan Wolter, District 15 Metropolitan Council Representative
Wendy Wulff, District 16 Metropolitan Council Representative
Governor Tim Pawlenty



City Manager's Office

February 18, 2010

MAYOR
DEBBIE GOETTEL

CITY COUNCIL
PAT ELLIOTT
TOM FITZHENRY
SUZANNE M. SANDAHL
FRED L. WROGGE, JR.

CITY MANAGER
STEVEN L. DEVICH

MAC Planning & Environment
Attn: Ms. Jenn Felger
6040.28th Avenue South
Minneapolis, MN. 55450

Subject: MSP 2030 LTCP Comments

Dear Ms. Felger:

Thank you for the opportunity to comment on the proposed draft of the 2030 Minneapolis/St. Paul International Airport (MSP) Long Term Comprehensive Plan (LTCP). The City of Richfield has several comments related to the draft of the 2030 LTCP.

Noise

In 1998, when it was decided that MSP would expand at its current location, surrounding communities were presented with tremendous challenges as well as opportunities. The commitment to continue to reinvest in MSP infrastructure, facilities, and transportation systems provides a significant economic benefit to not only the City of Richfield, but all the surrounding communities. However, the noise impact to Richfield residents remains a concern.

The draft LTCP forecasts a 40% growth in annual aircraft operations by 2030, which is an increase from 450,000 in 2008 to 630,000 projected operations in 2030. As part of the increase in operations, the draft LTCP also includes projected 2030 noise contours (Figure 5-4) in which the projected 60-64 DNL noise contour extends well beyond portions of Richfield that had previously qualified for noise mitigation funds.

21

The City of Richfield is extremely concerned that the draft LTCP does not address future noise mitigation to the impacted residents of the projected 2030 noise contour. According to the LTCP projections (Table 5.11) an additional 2,830 Richfield single family and multi family homes in the 60-64 DNL would be impacted by the proposed 2030 DNL noise contours. After the difficulty experienced in getting Richfield homeowners in the 2007 DNL noise contour noise mitigation, the City of Richfield wants to see the final version of the LTCP provide a plan for noise mitigation for those homes projected to be impacted in the 2030 noise contours. At a minimum, the same level of noise mitigation as the homes received under the 2007 legal settlement should be provided.

Airport Capacity

The draft LTCP states, "Though aircraft operations will grow, the existing four-runway airfield is expected to be able to continue to operate in a safe and efficient manner without the need for additional runways."

The Urban Hometown

8700 PORTLAND AVENUE, RICHFIELD, MINNESOTA 55423 612.881.9700 FAX: 612.861.9748

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Ms. Jenn Felger
February 18, 2010
Page two

The LTCP indicates that in 2008 there were over 450,000 operations at MSP. Airport planning guidelines (FAA Order 5090.3c) suggest that additional runway or supplemental airport planning process should begin when an airfield reaches 60%-75% of annual capacity, which would be reached by MSP when operations exceed 480,000 operations a year. Table 2.16 shows that MSP will exceed operations by at least 2015, well before the LTCP is required to be updated again by the Metropolitan Council.

22

Additionally, the draft LTCP states that by 2030, when the annual operations reach 630,000, an average delay of 10 minutes per operation is acceptable. Comments have been made to the City of Richfield and the surrounding communities of MSP that a delay ranging from 9 to 12 minutes per operation is considered congested to severely congested. Based on all the information given to the communities, a number of questions arise. Why doesn't the LTCP address the need for ongoing planning for capacity? Shouldn't the LTCP for MSP address the optimum size and capacity for levels out to 2030? Since the LTCP is for future development goals and policies what is the future plan?

23

Since the draft LTCP proposes an additional \$2-2.4 billion in investment for the suggested airport expansion improvements on top of the recent \$3 billion invested in the 2010 program, the City of Richfield questions whether this sets the stage for discussions on the potential planning process for the construction of a third parallel runway. If an additional runway is a potential viability in the future, then this is the setting in which it should be discussed and planned.

24

The City of Richfield realizes that forecasting is a difficult task, especially when attempting to forecast over an extended period of time. At the January 20, 2010 Noise Oversight Committee meeting, MAC staff stated that they would review operation forecasts and noise contours every five years to ensure they are as accurate as possible for all future planning. We look forward to receiving continuous updates.

Land Use

The City of Richfield has adopted land use goals and policies in its Comprehensive Plan as well as adopting into our Zoning Code an airport overlay district that includes the Joint Airport Zoning Board ordinance and additional recommendations for new residential construction in areas where the noise contour is 60 DNL or higher.

25

The recommendations in the draft LTCP to use the Metropolitan Builders Guide in airport impact areas for construction that is consistent with the MSP Part 150 program goals needs clarification. The concern for the City of Richfield is that the Builders Guide is for only new residential construction. The Builders Guide does not address additions and alterations which are a large percentage of home improvements for residential properties located in airport noise impacted areas in Richfield. Also, the Builders Guide provides examples of wall construction for noise mitigation, but there are no examples for roof/ceiling construction which would assist in noise reduction. If this is to be a viable document that the City of Richfield would feel comfortable handing out to homeowners and contractors then it needs to address residential additions/alterations, include roof/ceiling examples, and be updated and/or reviewed more often, since the most recent Builders Guide is dated March 2006.

Ms. Jenn Felger
February 18, 2010
Page three

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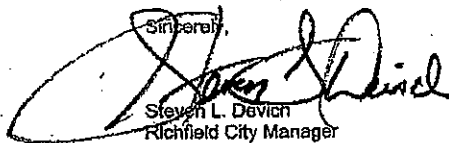
In Section 1.4.7, regarding support facilities, the draft LTCP references that there are three additional airline maintenance hangers on the western edge of the airfield with approximately 247,000 square feet for hangers, shops, and offices. The City of Richfield would like to draw to the MAC's attention a concern with the hangers in 2007 that resulted in a reduction on noise impacts that the City would hope future users would consider. In 2007, the City worked closely with MAC staff and the NOC to monitor the noise impacts that were affecting residents directly west of the hangers in Richfield. Procedures were developed with the businesses at the time to change the way and direction in which aircraft were removed from the hangers. The changes in operation produced no measurable noise impacts west of Cedar Avenue in Richfield during the late night/early morning time period, thus solving operational noise problems. The City realizes that at the time these practices were put into place the hangers were being used and most of the aircraft were Stage 3 hushkitted aircraft. Yet it is hoped that when future users occupy these hangers that they consider the same practices for aircraft operations on the west side.

27

Lastly, in Section 1.5.1, Figure 1-9 depicts the inventory of the wetlands within airport property. The figure is very difficult to distinguish where the border of the City of Richfield is located. The City would request that you revise the map to indicate that the border of Richfield is west of Trunk Highway 77 (TH 77), but includes the Richfield Public Works Maintenance Facility which is located east of the northbound on-ramp onto 66th Street. And, the northern border of Richfield is from 62nd Street south, while north of 62nd Street is the City of Minneapolis. We would like to see this area more clearly defined as Richfield property.

Again, thank you for the opportunity to comment on the proposed 2030 LTCP. Should you have any questions about the comments made by the City of Richfield, please feel free to contact Pam Dmytrenko, Assistant to the City Manager at 612-861-9708 or via email at pdmytrenko@cityofrichfield.org.

Sincerely,



Steven L. Davich
Richfield City Manager

SD:ds

Copy: Richfield Mayor and City Council
State Representative Paul Thissen, District 63A
State Representative Linda Slocum, District 63B
State Senator Kenneth Kelash, District 63
MAC Commissioner Lisa Poiken, District C
Metropolitan Council Representative Polly Bowles, District 5
Metropolitan Council Sector Representative Denise Pedersen Engen
Governor Tim Pawlenty

Felger, Jenn

From: Paul Sabourin (paul.sabourin@gmail.com)
Sent: Friday, February 19, 2010 12:52 AM
To: Felger, Jenn
Subject: Comprehensive Plan Comments

Ms. Felger -

I'd like to make a couple of comments on the MSP Airport Comprehensive Plan Update.

I'm especially interested especially in traffic movement on Eastbound Highway 5, and the weaving problems currently resulting from the left-side entrance to and exit from Glumack Drive to this Highway 5, especially when combined with the close spacing between interchanges in this area. Based on the discussion in Chapter 4 of the Comprehensive Plan Update, and as depicted on Figure 4-12, the plan apparently envisions a major reconstruction of this interchange, but maintains these nonstandard entrances and exits from Highway 5.

At the present time, the left-exit from Highway 5 causes traffic flow problems. Part of the problem here is due simply to the typical issues with left-hand exits, idrivers in the left lane of Highway 5 changing to the center lane to avoid having to exit at the airport. This is compounded by the numerous taxis coming from the waiting area on Post Road that enter Highway 5 on the right hand side, at relatively slow speed, and then must not only merge to the right hand traffic lane but also move left another lane in order to get to the Lindbergh terminal exit, all in a distance of about a quarter of a mile.

A similar problem exists with vehicles entering eastbound Highway 5 from Glumack Drive. A large proportion of the cars entering Highway 5 from the left at this point are destined for Minneapolis via Highway 55. Of course, the Highway 55 exit is only just over a quarter mile away, and is a the right-side exit from Highway 5. The large number of cars making this lane change, including many who are apparently unfamiliar with highways in this area and who are consulting maps or their GPS as they drive, results in regular problems in this section of highway.

Given the projections for increased traffic at the airport contained in the draft plan, it seems clear that if the interchange between Glumack Drive and Highway 5 is to be completely reconstructed, I believe that MAC should use this opportunity to relocate the exit from and entrance to eastbound Highway 5 to the right-hand side and improve traffic flow and safety in this area.

Paul Sabourin
1917 Fairmount Ave
St. Paul, Minnesota

Minnesota Department of Transportation Road Design Manual
<http://www.dot.state.mn.us/design/rdm/>



Minneapolis
City of Lakes

Office of the Mayor

R. T. Rybak
Mayor

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February 19, 2010

Ms. Jenn Felger
MAC Planning and Environment
6040 28th Avenue South
Minneapolis, MN 55450

Re: MSP LTCP Update

Dear Ms. Felger,

Thank you for the opportunity to review the draft update of the MSP Long Term Comprehensive Plan. We appreciate the opportunity to comment on the draft representing the Metropolitan Airports Commission's first update since the 2010 plan was approved in 1996. We further look forward to more regularly scheduled updates each five years as has been expressed by MAC staff in presentations to elected officials.

The City remains concerned, however, about the integrally related issues of airport capacity, delay and infrastructure investment. As we expressed in our October, 2009 letter forecast operational activity is expected to be 98.5% of airfield capacity in 2030, virtually assuring a congested airport. The LTCP update projects an average delay of 10 minutes per operation while the 2030 regional benchmark for aircraft delay is 7.1 minutes for 2030. The LTCP projection thus is more than 40% over the regional benchmark for 2030.

29

MAC's January 15, 2010 response to the City's initial comments states, "...the anticipated benefits from implementing the NextGen Air Traffic Control system, we believe that the airfield capacity at MSP will actually increase by 2030." Our understanding is that implementation of NextGen would, however, at best result in possibly up to a 15% increase in capacity. If this were actually the case, MSP would still be operating at over 85% of capacity, significantly above the threshold of when planning should be addressing this constraint.

The 1993 *MSP Capacity Enhancement Plan* recommended action was to add both new runways 17/35 and 11N/29N (now 12N/30N) at "Future 2" operational levels of 600,000 annual operations. How or why has this changed? Knowing that the future airfield (even under fairly conservative forecasts) will be significantly constrained, it begs the question how much additional investment should be made in MSP. It seems prudent that the MAC knowing that this is going to be an issue within this planning horizon should be addressing that particular problem in this update.

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As elected stewards of our community, we are sorely disappointed that once again MSP is proposed to be expanded increasing the impacts on neighboring communities and making no attempt to address mitigating noise impacts. We are quite aware that the FAA's threshold for significant noise impacts is at noise levels above 65 DNL. However, this regional community set its airport noise threshold at 60DNL in 1998 by action of the Noise Mitigation Committee and subsequently

30 | by MAC action. The expansion of MSP approved for the 2010 program was predicated on addressing noise impacts in neighboring communities. Why would this new expansion plan be proposed without addressing mitigation of noise impacts?

31 | The trend toward addressing airport noise at levels beyond 65 DNL is increasing and is very likely to change within this planning timeframe. The recent European HYENA studies are being discussed at FAA's Aviation Research Roadmap Workshops in terms of issues of annoyance and sleep interference. The International Standards Organization is likely to adopt a dose/response curve predicting community annoyance to aircraft noise will show that twice as many people are highly annoyed than with the Schultz noise curve. The point at which 12.3 percent of people are highly annoyed (FAA's current 65 DNL threshold) would be pushed out to the 55 DNL level.

Quoting from the article in *Airport Noise Report*, "The Federal Interagency Committee on Aviation Noise (FICAN), which FICON evolved into, will be under pressure to adopt the revised ISO standard, which is voluntary but represents the consensus of world experts, and FAA will be under pressure to recognize the revision as a significant change."

32 | As MAC continues to grow the airport and with the likelihood that noise impacts are going to continue to be a significant annoyance to residents, the LTCP update must address how noise associated with the expanded airport would be mitigated and include a budget recognizing the costs.

We look forward to your responses as you continue through this process. If you have any questions regarding our comments, please contact Merient Otto, Principal Planner, at 612-673-2576.

Sincerely,



Mayor R.T. Rybak
City of Minneapolis

CC: Glen Orcutt, FAA ADO
Peter Bell, Metropolitan Council
Chauncey Case, MC Sr. Aviation Planner
Minneapolis Legislative Delegation

General Comments and Responses

Index	General Topic	General Response
GR-1	<p>The Draft MSP 2030 LTCP forecasts increased noise levels around MSP in 2030. As such, the LTCP should specify the planned mitigation for newly-impacted properties, including those located in the 64-60 DNL noise contours.</p>	<p>NEPA/MEPA environmental review documentation will precede implementation of any project that may arise from the Draft MSP 2030 LTCP. Such environmental review is the appropriate mechanism for evaluating any environmental impact of the project and possible mitigation measures. In the case of airport noise, mitigation may include a noise analysis under 14 C.F.R. Part 150.</p> <p>The MAC is currently implementing an aggressive residential noise mitigation program providing mitigation to homes located in the 2005 and 2007 60 DNL noise contours. The FAA and the MAC developed these noise contours based on a forecasted annual operations level of 582,366. The MAC will complete the ongoing mitigation effort in 2014.</p> <p>Based on the forecast contained in the Draft MSP 2030 LTCP, operational levels at MSP are not anticipated to reach the annual levels presently being mitigated (that is, the 2005 and 2007 60 DNL noise contours developed based on a forecasted annual operations level of 582,366) until approximately 2020.</p>
GR-2	<p>The Draft MSP 2030 LTCP forecasts annual operations to reach 630,000 by 2030. As such, the LTCP should address the need for ongoing planning for capacity and/or a supplemental airport. Airport planning guidelines (FAA Order 5090.3c) state that an additional runway or supplemental airport planning process begins when the airfield reaches 60-75% of annual capacity.</p>	<p>The Draft MSP 2030 LTCP evaluated the planning and capacity needs for both landside and airside facilities during the planning period through 2030. MSP is anticipated to reach approximately 630,637 operations by 2030. Based on this forecast, no additional runway capacity is necessary to meet the forecasted growth.</p> <p>The 1993 Minneapolis-St. Paul International Airport Capacity Enhancement Plan evaluated various capacity levels and developed delay curves for the existing airport configuration with alternative airfield improvements, facilities and equipment improvements and operational improvements. These delay curves did not establish a maximum airfield capacity, but provided anticipated delay with a given operational level.</p> <p>Additional airfield operational level analysis was also reported in the 2015 Terminal Expansion Project Draft Environmental Assessment. In this study, operational levels up to 723,000 annual operations were evaluated with an average anticipated delay of 12.7 minutes per operation. Again, this level of delay does not establish an airfield capacity limit, but a level of delay that is considered to be the maximum level tolerable based on a review of the nation's</p>

<p>most congested airports.</p>	<p>In 2004, prior to the opening of Runway 17-35, MSP recorded over 541,000 annual operations with an approximate delay of seven minutes per aircraft. Annual operational levels have declined every year since this peak and declined to 432,604 operations in 2009.</p> <p>The 1998 FEIS estimated that the construction of Runway 17-35 could add approximately 25% airfield capacity at MSP. Additional capacity enhancements are also expected with the implementation of elements of the FAA's NextGen Air Traffic Control system. Improvements in the NextGen Air Traffic Control system include: (1) advanced Traffic Management Advisor (TMA) to allow controllers to sequence aircraft more efficiently; (2) Cockpit Display of Traffic Information (CDIT) - Enhanced Flight rules which will enable specially-equipped aircraft to maintain visual approaches even in marginal weather conditions; and (3) RNAV and Required Navigation Performance (RNP) procedures that will enable aircraft to fly precision departure and approach paths.</p> <p>The Draft MSP 2030 LTCP anticipates operational level recovery to the 2004 level of approximately 541,000 annual operations to occur in 2019 to 2020 time period. An FAA Capacity Study may be appropriate when the operations levels recover to previous high historical levels of approximately 540,000 operations and a clear upward trend is established. The FAA's planning guidelines will be considered as part of the MAC's future planning process. Finally, the MAC will continue to conduct periodic updates of the LTCP, which will include updated forecasts for operations and delay, and through this process will identify future airfield capacity needs and potential solutions.</p>
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Comments and Responses

Commenter	ID	Subject	Response
<p>Mayor Gene Winstead City of Bloomington 1800 W Old Shakopee Rd Bloomington MN 55431-3027</p>	<p>1</p>	<p>The draft LTCP anticipates expanding the Humphrey Terminal in two phases from 10 gates to 27 gates in 2015 and again to 37 gates by 2026. All non-Sky Team airlines are proposed to move from the Lindbergh Terminal to the Humphrey Terminal in 2015. This Humphrey Terminal expansion will increase traffic volumes on 34th Avenue and Post Road and require significant improvements to the 34th Avenue interchanges with I-494. The draft LTCP anticipates the Metropolitan Airports Commission (MAC) funding \$31 million in improvements for 34th Avenue and \$95 million in improvements for Post Road.</p> <p>Based on information presented in the 2015 MSP Terminal Expansion Project Environmental Assessment, Bloomington understands that completing the Humphrey Terminal expansion prior to major improvements at the 34th Avenue/I-494 interchange would lead to "unacceptable" traffic conditions at the interchange. Bloomington therefore commends the MAC for incorporating plans and proposed funding to improve the interchange. Given the challenges of having the improvements in place by 2015, the City is ready to work quickly and cooperatively with the MAC and Mn/DOT to design the improvements and agree on an overall funding package.</p>	<p>In the past, the MAC worked cooperatively with the City of Bloomington and Mn/DOT to proactively address roadway congestion on 34th Avenue and the I-494 Interchange. A tri-agency analysis was completed in June 2008 which incorporated the traffic demand expected from the airport, the Bloomington South Loop development, including the Mall of America expansion, and Mn/DOT's mainline demands. Several options were identified that could be undertaken to improve the situation. Since the completion of the 2015 Draft EA there has been a softening in the 34th Avenue traffic demand based on the depressed economy, airline bankruptcy and outsourcing, etc. The MAC looks forward to continuing its cooperative relationship to find funding solutions for all of these mainline challenges in concert with the demand. As with the South Loop development, the Terminal 2-Humphrey expansion includes growth capacity for the future so the total demand will likely not be present until sometime after 2015. Never the less, the MAC understands that these solutions take significant planning and implementation resources and will require inter-governmental cooperation and support to be accomplished. The MAC looks forward to working with all benefiting partners to provide time-sensitive transportation solutions in sync with demand requirements.</p> <p>The MAC has identified costs in the Draft MSP 2030 LTCP in an attempt to identify the magnitude of resources that likely will be required, not the source of funding. Certainly the reasonable expectation is that all benefiting parties will contribute in proportion to the benefit received. Similarly all Federal, State and local transportation funding sources must be pursued.</p>

	<p>See GR-1.</p>	<p>The MAC concurs with the comments and looks forward to additional discussion on these topics.</p>
2	<p>The draft LTCP forecasts 40% growth in annual aircraft operations by 2030, from 450,000 to 630,000. Based on the increased operations, the draft plan includes 2030 projected noise contours (Figure 5-4). These projected 60 DNL noise contours depict noise levels in portions of Bloomington and other communities extending beyond blocks that qualified for noise mitigation funds in the past.</p> <p>The MAC has a history of proactively addressing noise impacts on residential areas through noise mitigations programs. However, the draft LTCP does not discuss additional residential noise mitigation, nor does it call out any MAC expenditures for noise mitigation through 2030. Bloomington believes that increased noise impacts need to be mitigated and strongly recommends that the final version of the LTCP outline a noise mitigation approach that would apply to newly impacted blocks.</p>	
3		<p>The first three stated goals of the draft LTCP discuss environmentally friendly activities, improved energy efficiencies and increased use of public transportation, all of which the City of Bloomington strongly supports. As we have previously discussed, Bloomington is currently preparing plans for the South Loop District on MSP's southern border. The South Loop District Plan will focus on a variety of sustainability initiatives. Given our mutually</p>

	<p>shared goals, adjacent sites and similar plans, there are opportunities to work cooperatively on various sustainability initiatives, including district energy and shared parking during peak demand periods. Bloomington looks forward to additional discussion on these and other mutually beneficial projects.</p>	
<p>See GR-2.</p>	<p>The LTCP forecasts operations up to 98.5% of estimated airfield capacity. Airport planning guidelines suggest that planning for an additional runway or supplemental airport should occur when an airport reaches 60-75% of capacity. The City of Mendota Heights requests that the LTCP include some framework for what the ongoing process for capacity planning would look like.</p>	<p>Mayor John Huber City of Mendota Heights 1101 Victoria Curve Mendota Heights MN 55118</p>
<p>Capital expenditures to construct the facilities identified in the Draft MSP 2030 LTCP are paid with airport revenues. The Draft LTCP alternatives are designed to maximize the utilization of the existing facilities to the fullest extent possible and to enhance aircraft operational safety and efficiency while providing sufficient, environmentally-friendly facilities to serve existing and future demand through the year 2030.</p>	<p>The City of Mendota Heights questions investing up to \$2.4 billion (on top of \$3 billion invested in the 2010 program) as the best use of resources. At best, the outcome can only be an airport functioning at full capacity with no plan or vision to address the congestion this will create.</p>	<p>5</p>
<p>As the MAC explained on April 28, 2009, and August 26, 2009, in meetings with Mendota Heights City Representatives, and to the Mendota City Heights Council on October 6, 2009, the MAC conducted the noise contour development process in parallel with the Draft MSP 2030 LTCP document planning activities. Noise contours were not available at the time of the MAC's meetings with the City of Mendota Height. However, as soon as the contours were available, the MAC presented them</p>	<p>The noise contour presented in the January 20, 2010 Noise Oversight Committee meeting shows significant changes from the current noise contour. We regret the fact that this contour was not presented at the MAC presentation to our City Council. The City of Mendota Heights encourages the regular and accurate review of the noise contours.</p>	<p>6</p>

<p>to the City of Mendota Heights and other interested cities. The MAC also made a detailed presentation on the noise contours at the January 20, 2010, Noise Oversight Committee meeting:</p>		
<p>As noted, the Draft MSP 2030 LTCP is a phased plan of development positioned to respond on a phased basis to future demands. Regional infrastructure impacts will be assessed moving forward on a phased basis, in concert with the respective regional agencies to provide them input for their use in responding to the total needs of the regional system.</p>	<p>The LTCP does not address regional impacts upon infrastructure. The plan forecasts increases in airport usage, but makes no mention of traffic volumes for roadways in and out of the airport. The City of Mendota Heights requests that current and forecasted traffic volumes on roadways be included in the plan.</p>	<p>7.</p>
<p>The Draft MSP 2030 LTCP does not identify a need for additional runway capacity to meet the forecasted growth at MSP through 2030.</p>	<p>The City of Mendota Heights would like to take this opportunity to restate our strong opposition to any consideration of a third parallel runway at MSP Airport. Our community has been guided and developed around the current configuration of the airport. A third parallel runway would be in direct conflict to the long held and well established vision of this community.</p>	<p>8</p>
<p>Comment noted. See also GR-1.</p>	<p>The draft LTCP forecasts 40% growth in annual aircraft operations by 2030, from 450,000 to 630,000 operations. Based on the increase in operations, the draft plan includes 2030 projected noise contours (Figure 5-4). These projected 60 DNL noise contours depict noise levels in portions of Eagan and other communities extending well beyond blocks that have previously qualified for noise mitigation funds.</p>	<p>9</p> <p>Mayor Mike Maguire, City of Eagan 3830 Pilot Knob Road Eagan MN 55122-1810</p>

	<p>10</p> <p>Given the dramatic increase to the noise contours over southwest Eagan, which is made up of predominately residential homes that were built well before the decision was made to build Runway 17/35, the City of Eagan strongly recommends that the final version of the LTCP outline a noise mitigation approach that would apply to all newly impacted blocks. Specifically, the City advocates that those homes being added to the 60-64 DNL contours receive, at minimum, the same level of noise mitigation as those homes that received mitigation under the 2007 legal settlement (with an adjusted funding allocation per the CPI).</p>	<p>See GR-1.</p>
	<p>11</p> <p>How and why is it that the contour "lobe" is proposed to increase dramatically off of 17/35, while decreasing over the Corridor?</p>	<p>Based on the overall increase in operations forecasted to occur by 2030, the use of Runway 17 for departure operations is predicted to increase to 30.3% by 2030, from 18.2% in 2009; and arrivals on Runway 35 are predicted to increase to 28.1% by 2030, from 22.8% in 2009. This is largely due to the anticipated operational levels forecast at MSP by 2030. While runway use percentages are forecasted to increase on Runway 17-35, the departure percentages to the southeast in the Eagan/Mendota Heights Departure Corridor remain relatively consistent with present levels. Additionally, the operations to the southeast of MSP are distributed on two runways with varying headings causing the contour in that area to be much wider and less elongated than is the case to the south of Runway 17-35.</p>
	<p>12</p> <p>Is the proposed contour extension over southwest Eagan a direct result of additional</p>	<p>No. The contour extension is primarily a result of an overall increase in forecasted aircraft operations at MSP through</p>

	gates being added to the Humphrey Terminal?	2030. See also response to comment #11 above.
13	<p>Figure 5-9 shows that projected runway use in 2030 calls for Runway 17 to be used for 30.3% of all departures, the highest percentage of all runways. Furthermore, Runway 17 is proposed to be used for 25.6% of all nighttime departures, which well exceeds the forecasted use of both 12L and 12R. These projections directly conflict with the approved Runway Use System (RUS) at MSP, which calls for the parallel runways to serve as the first priority for both day and evening departure operations. How will the MAC address this conflict between the 2030 runway use projections and the approved RUS?</p>	<p>The Runway Use System (RUS) at MSP details runway use preference in order of priority for departure and arrival operations to reduce noise impacts. There is no proposed change to the RUS. Departure operations to the southeast off either Runway 12L or Runway 12R will continue to be the first priority for runway selection from a noise abatement perspective. However, the final decision on runway selection is the responsibility and province of FAA Air Traffic Control, regardless of the RUS. Factors such as capacity and safety take priority over the RUS when the FAA is making runway use determinations.</p> <p>The NEPA/MEPA environmental review documentation will precede implementation of any project that may arise from the Draft 2030 MSP LTCP. Such environmental review will provide more detailed analysis of forecasted runway use. Based on this analysis, if concerns remain related to the RUS and the associated runway use percentages in the context of environmental impacts, additional discussion and analysis may be required. In the case of airport noise, this may include a noise analysis under 14 C.F.R. Part 150.</p>
14	<p>Eagan strongly encourages the MAC to work with the FAA in the coming years to ensure that the RUS is adhered to and the Corridor is used to the greatest extent possible so as not to place undue burden on the predominately residential areas of Eagan, including those homes under the flight paths of 17/35.</p>	<p>Comment noted. The MAC will continue to work with the cities located around MSP and the FAA to address noise concerns. The MSP Noise Oversight Committee will continue to be a critical element in this ongoing effort into the future.</p>
15	<p>The City of Eagan recognizes that forecasts are difficult during this time of economic</p>	<p>The MAC concurs with this comment.</p>

		<p>upheaval, and will anticipate a thorough review of the operations and contours in five years, or as soon as the economy and airline industry stabilize.</p>	
16		<p>Once that stabilization has occurred, the City asks that the MAC undergo a formal Part 150 process to ensure that the noise environment and corresponding noise mitigation program can be evaluated accordingly.</p>	<p>See GR-1.</p>
17		<p>The City of Eagan has adopted land use policies through its Comprehensive Guide Plan and construction regulations through its zoning code to minimize the introduction of substantial new areas of noise sensitive uses within the 2008 Policy Contours and to require sound attenuation construction practices where appropriate. The City cannot implement modifications of the Policy Contours unless and until the Metropolitan Council takes action in that regard. The City will monitor the Met Council review of the MSP LTCP and revisit these topics as may be necessary once that review has been completed.</p>	<p>Comment noted.</p>
18		<p>The LTCP states that the existing four-runway airfield configuration is expected to be able to continue operating in a safe and efficient manner without the need for additional runways.</p> <p>According to the operation projections in the</p>	<p>See GR-2.</p>

	<p>LTCP, there were over 450,000 operations in 2008. Airport planning guidelines (FAA Order 5090.3c) state that an additional runway or supplemental airport planning process begins when the airfield reaches 60-75% of annual capacity, which is a threshold that would be reached at MSP when operations exceed 480,000 operations per year. Additionally, statements have been made to lead communities to believe that congestion levels at MSP Airport are on track to exceed delay levels of 10 minutes per operation. In light of the operation levels being predicted for MSP out to 2030, at what point will the MAC address airfield capacity concerns, and is there an optimum size or activity level for MSP?</p>	
<p>The Draft MSP 2030 LTCP does not identify a need for additional runway capacity to meet the forecasted growth at MSP through 2030.</p>	<p>19</p> <p>Additionally, what considerations have been made in the long term planning process regarding the possibility for the construction of a 3rd parallel runway?</p>	
<p>Comment noted. The MAC will continue to incorporate sustainable building practices into future facilities.</p>	<p>20</p> <p>The City of Eagan very much appreciates the ongoing commitment the MAC has made to improve the infrastructure at MSP Airport. Eagan continues to support the efforts of the MAC to strengthen the presence of MSP Airport through improvements to its facilities, parking structures and transportation system. As an employment and transportation hub, Eagan stands to benefit significantly from an economic development standpoint, and encourages the MAC to continue reinvesting</p>	

	<p>in MSP Airport. Furthermore, as the City promotes its goal of reducing energy and promoting environmental sustainability, we encourage the MAC to continue its efforts to utilize sustainable building practices as expansion and reinvestment plans for MSP take shape.</p>	
<p>See GR-1.</p>	<p>The draft LTCP forecasts a 40% growth in annual aircraft operations by 2030, which is an increase from 450,000 in 2008 to 630,000 projected operations in 2030. As part of the increase in operations, the draft LTCP also includes projected 2030 noise contours (Figure 5-4) in which the projected 60-64 DNL noise contour extends well beyond portions of Richfield that had previously qualified for noise mitigation funds.</p> <p>The City of Richfield is extremely concerned that the draft LTCP does not address future noise mitigation to the impacted residents of the projected 2030 noise contour... the City of Richfield wants to see the final version of the LTCP provide a plan for noise mitigation for those homes projected to be impacted in the 2030 noise contours. At a minimum, the same level of noise mitigation as the homes received under the 2007 legal settlement should be provided.</p>	<p>21</p> <p>Mr. Steven Devich City Manager City of Richfield 6700 Portland Avenue Richfield MN 55423</p>
<p>See GR-2.</p>	<p>The LTCP indicates that in 2008 there were over 450,000 operations at MSP. Airport planning guidelines (FAA Order 5090.3c)</p>	<p>22</p>

	<p>suggest that additional runway or supplemental airport planning process should begin when an airfield reaches 60%-75% of annual capacity, which would be reached by MSP when operations exceed 480,000 operations a year. Table 2.16 shows that MSP will exceed operations by at least 2015, well before the LTCP is required to be updated again by the Metropolitan Council.</p> <p>Additionally, the draft LTCP states that by 2030, when the annual operations reach 630,000, an average delay of 10 minutes per operation is acceptable. Comments have been made to the City of Richfield and the surrounding communities of MSP that a delay ranging from 9 to 12 minutes per operation is considered congested to severely-congested. Based on all the information given to the communities, a number of questions arise. Why doesn't the LTCP address the need for ongoing planning for capacity? Shouldn't the LTCP for MSP address the optimum size and capacity for levels out to 2030? Since the LTCP is for future development goals and policies what is the future plan?</p>	
<p>The Draft MSP 2030 LTCP does not identify a need for additional runway capacity to meet the forecasted growth at MSP through 2030.</p>	<p>Since the draft LTCP proposes an additional \$2-2.4 billion in investment for the suggested airport expansion improvement on top of the recent \$3 billion invested in the 2010 program, the City of Richfield questions whether this sets the stage for discussions on the potential planning process for the construction of a third</p>	<p>23</p>

		<p>parallel runway. If an additional runway is a potential viability in the future, than this is the setting in which it should be discussed and planned.</p>	
24		<p>The City of Richfield realizes that forecasting is a difficult task, especially when attempting to forecast over an extended period of time. At the January 20, 2010 Noise Oversight Committee meeting, MAC staff stated that they would review operation forecasts and noise contours every five years to ensure they are as accurate as possible for all future planning. We look forward to receiving continuous updates.</p>	<p>Comment noted.</p>
25		<p>The recommendations in the draft LTCP to use the Metropolitan Builders Guide in airport impact areas for construction that is consistent with the MPS Part 150 program goals needs clarification. The concern for the City of Richfield is that the Builders Guide is for only new residential construction. The Builders Guide does not address additions and alterations which are a large percentage of home improvements for residential properties located in airport noise impacted areas in Richfield. Also, the Builders Guide provides examples of wall construction for noise mitigation, but there are no examples for roof/ceiling construction which would assist in noise reduction. If this is to be a viable document that the City of Richfield would feel comfortable handing out to homeowners and</p>	<p>Comment noted. The MAC does not have control over the development of, or updates to, the Metropolitan Council's Builders Guide. The Draft MSP 2030 LTCP does not limit the City of Richfield from adopting construction standards to address additions and alterations consistent with the new residential construction standards in the Builders Guide.</p>

	<p>contractors than it needs to address residential additions/alterations, include roof/ceiling examples, and be updated and/or reviewed more often, since the most recent Builders Guide is dated March 2006.</p>	
<p>The MAC remains committed to the ongoing use of the west side aircraft engine start procedure that was developed in consultation with the Noise Oversight Committee and the City of Richfield. The procedure was implemented in 2007 via agreements with west side tenants at MSP. The MAC intends to enact that same agreement in similar cases with future new tenants on the west side.</p>	<p>...the draft LTCP references that there are three additional airline maintenance hangars on the western edge of the airfield with approximately 247,000 square feet for hangars, shops and offices. The City of Richfield would like to draw the MAC's attention to a concern with the hangars in 2007 that resulted in a reduction on noise impacts that the City would hope future users would consider. In 2007, the City worked closely with MAC staff and the NOC to monitor the noise impacts that were affecting residents directly west of the hangars in Richfield. Procedures were developed with the businesses at the time to change the way and direction in which aircraft were removed from the hangars. The changes in operation produced no measurable noise impacts west of Cedar Avenue in Richfield during the late night/early morning time period, thus solving operational noise problems. The City realizes that at the time these practices were put into place the hangars were being used and most of the aircraft were Stage 3 hushkitted aircraft. Yet it is hoped that when future users occupy these hangars that they consider the same practices for aircraft operations on the west side.</p>	<p>26</p>

	27	<p>...Figure 1-9 depicts the inventory of the wetlands within airport property. The figure is very difficult to distinguish where the border of the City of Richfield is located. The City would request that you revise the map to indicate that the border of Richfield is west of Trunk Highway 77 (TH 77), but includes the Richfield Public Works Maintenance Facility which is located east of the northbound on-ramp onto 66th Street. And, the northern border of Richfield is from 62nd Street south, while north of 62nd Street is the City of Minneapolis. We would like to see this area more clearly defined as Richfield property.</p>	<p>The map was revised to better distinguish the MSP airport property boundary as originally intended.</p>
<p>Mr. Paul Sabourin 1917 Fairmount Avenue St Paul MN 55105-1539</p>	28	<p>...traffic movement on Eastbound Highway 5, and the weaving problems currently resulting from the left-side entrance to and exit from Glumack Drive to this Highway 5, especially when combined with the close spacing between interchanges in this area. Based on the discussion in Chapter 4 of the Comprehensive Plan Update, and as depicted on Figure 4-12, the plan apparently envisions a major reconstruction of this interchange, but maintains these nonstandard entrances and exits from Highway 5.</p> <p>... the left-exit from Highway 5 causes traffic flow problems.</p> <p>...A similar problem exists with vehicles entering eastbound on Highway 5 from</p>	<p>Future planning phases of the general improvements identified in the Draft MSP 2030 LTCP will take into consideration a number of key criteria. These criteria include total daily and peak hour traffic volumes, roadway capacity analysis, weaving movements, merge and diverge conditions, and numerous other traffic operations criteria important to improved roadway operations and safety. To the extent possible and within the constraints of available right of way, natural resources, funding, and other considerations, design geometrics for the roadway itself will also be critical and will meet the design criteria as set forth in the Mn/DOT Road Design Manual, and in the <i>Roadside Design Guide</i> and <i>A Policy on Geometric Design of Highways and Streets</i> published by the American Association of State Highway and Transportation Officials.</p>

	<p>Glumack Drive.</p> <p>... Given the projections for increased traffic at the airport contained in the draft plan, it seems clear that if the interchange between Glumack Drive and Highway 5 is to be completely reconstructed, I believe that MAC should use this opportunity to relocate the exit from and entrance to eastbound Highway 5 to the right-hand side and improve traffic flow and safety in this area.</p>	
<p>See GR-2.</p>	<p>The City remains concerned, however, about the integrally related issues of airport capacity, delay and infrastructure investment. As we expressed in our October 2009 letter forecast operational activity is expected to be 98.5% of airfield capacity in 2030, virtually assuring a congested airport. The LTCP update projects an average delay of 10 minutes per operation while the 2030 regional benchmark for aircraft delay is 7.1 minutes for 2030. The LCTP projection is thus more than 40% over the regional benchmark for 2030.</p> <p>MAC's January 15, 2010 response to the City's initial comment states, "...the anticipated benefits from implementing the NextGen Air Traffic Control system, we believe that the airfield capacity at MSP will actually increase by 2030." Our understanding is that implementation of NextGen would, however, at best result in possibly up to a 15% increase in capacity. If</p>	<p>29</p> <p>Mayor R. T. Rybak City of Minneapolis Office of the Mayor 350 South 5th St - Room 331 Minneapolis MN 55415-1393</p>

	<p>this were actually the case, MSP would still be operating at over 85% of capacity, significantly above the threshold of when planning should be addressing this constraint.</p> <p>The 1993 MSP Capacity Enhancement Plan recommended action was to add both new runways 17/35 and 11N/29N (now 12N/30N) at "Future 2" operational levels of 600,000 annual operations. How or why has this changed? Knowing that the future airfield (even under fairly conservative forecasts) will be significantly constrained, it begs the question how much additional investment should be made in MSP. It seems prudent that the MAC knowing that this is going to be an issue within this planning horizon should be addressing that particular problem in this update.</p>	
<p>See GR-1. The MAC disagrees with the commentor's assertion that the MAC has established an airport noise threshold of significance of 60 DNL.</p>	<p>As elected stewards of our community, we are sorely disappointed that once again MSP is proposed to be expanded increasing the impacts on neighboring communities and making no attempt to address mitigating noise impacts. We are quite aware that the FAA's threshold for significant noise impacts is at noise levels above 65 DNL. However, this regional community set its airport noise threshold at 60 DNL in 1998 by action of the Noise Mitigation Committee and subsequently by MAC action. The expansion of MSP approved for the 2010 program was predicated on addressing noise impacts in</p>	<p>30</p>

	<p>neighboring communities. Why would this new expansion plan be proposed without addressing mitigation of noise impacts?</p>	
<p>31</p>	<p>The trend toward addressing airport noise levels beyond 65 DNL is increasing and is very likely to change within this planning timeframe. The recent European HYENA studies are being discussed at FAA's Aviation Research Roadmap Workshops in terms of issues of annoyance and sleep interference. The International Standards Organization is likely to adopt a dose-response curve predicting community annoyance to aircraft noise will show that twice as many people are highly annoyed than with the Schultz noise curve. The point at which 12.3 percent of people are highly annoyed (FAA's current 65 DNL threshold) would be pushed out to the 55 DNL level.</p> <p>Quoting from the article in <i>Airport Noise Report</i>, "The Federal Interagency Committee on Aviation Noise (FICAN), which FICON evolved into, will be under pressure to adopt the revised ISO standard, which is voluntary but represents the consensus of world experts, and FAA will be under pressure to recognize the revision as a significant change".</p>	<p>Comment noted.</p>
<p>32</p>	<p>As MAC continues to grow the airport and with the likelihood that noise impacts are going to continue to be a significant annoyance to</p>	<p>See GR-1.</p>

		<p>residents, the LTCP updated must address how noise associated with the expanded airport would be mitigated and include a budget recognizing the costs.</p>	
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EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

E.1 PURPOSE

The Metropolitan Council adopted guidelines to integrate information pertinent to planning, developing, and operating the region's airports in a manner compatible with their surrounding environs. The process to ensure this orderly development is documented in a Long Term Comprehensive Plan (LTCP) for each airport. In recognition of the dynamic nature of the aviation industry, the plans are to be updated regularly. The previous LTCP for the Minneapolis-St. Paul International Airport (MSP) was completed in 1996. The 2009 update will be the first revision to that LTCP and reflects substantial changes for MSP and the aviation industry over the past 13 years.

E.2 NEED

The aviation industry has changed since the previous LTCP for MSP was published in 1996. Airline consolidation, shifts in the aircraft fleet, new technologies, and evolving security protocols stemming from the September 11, 2001 terrorist attacks have resulted in many changes to operations that require new approaches to airport planning. These changes have affected airline service patterns, passenger processing and behavior, and have resulted in some development at MSP that was not part of the 1996 LTCP.

Airports work best when the capacities of their various elements are balanced and work in harmony to provide a safe, efficient system of facilities with a high level of customer service. Over time, some of MSP's facilities have become less efficient and some have not been improved to meet the dynamic needs of today's travelers.

While MSP's airfield was dramatically improved with the addition of a fourth runway in 2005, portions of the terminal and landside facilities have become outdated and need improvement. MSP's two-terminal system could be utilized more efficiently to provide better service to airlines and passengers alike. Terminal facilities, including the international arrivals hall, bag-claim hall, passenger security screening, and some concourses, need improvement. Access roads, parking, and terminal curb areas are also in need of enhancements to serve increasing passenger levels into the future. Finally, even with the new runway, MSP's airfield may require additional taxiways to improve aircraft circulation, especially around the terminal areas. These issues are the primary focuses of this updated LTCP.

The LTCP is a 20-year plan for MSP focused on developing facilities to accommodate forecast growth in a safe and efficient manner with a high level of customer service. Proposed improvements are phased to reflect the gradual growth of demand at MSP and to reflect lead time required for detailed planning, environmental analysis, design, and implementation.

E.3 PROCESS AND CONTENT

The LTCP consists of five primary tasks:

1. Assessing the condition and capacity of existing facilities
2. Forecasting long-range aviation demand
3. Determining future facility requirements
4. Identifying and evaluating various development options
5. Selecting a preferred comprehensive plan

The LTCP Update identifies the type and location of facility improvements needed to safely and efficiently accommodate aviation demand through the year 2030. The LTCP Update also provides guidance for phasing airport improvements during the development period. Noise contours were also generated for 2030 and are included in the full report.

The goals of this LTCP Update were established at the outset of the planning process and are listed here:

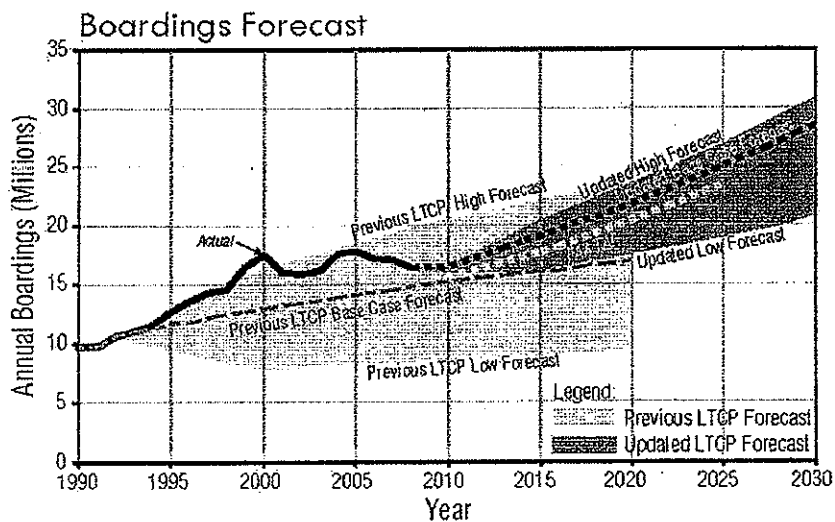
1. Provide sufficient, environmentally-friendly facilities to serve existing and future demand;
2. Provide improved energy efficiencies;
3. Encourage increased use of public transportation;
4. Minimize confusion associated with having two terminals and multiple access points;
5. Allow for flexibility in growth;
6. Utilize and maintain existing facilities to the fullest extent possible; and
7. Enhance aircraft operational safety and efficiency.

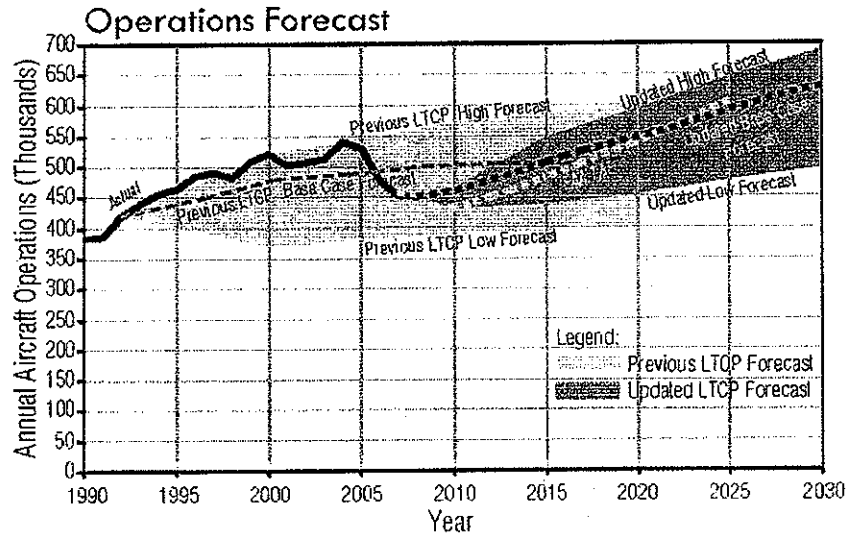
E.4 INVENTORY

Existing facilities at MSP were inventoried and their conditions and capacities assessed. The inventory shows that future plans for MSP will require consideration of balancing airfield capacity, terminal capacity, and landside capacity. In addition to properly balancing the capacities of these three functional elements of the airport, more efficient balance and utilization of the airport's two terminal complexes required consideration.

E.5 FORECAST

Forecasts of annual passenger boardings and aircraft operations (takeoffs and landings) were completed in June 2009. They show that passenger boardings are expected to increase by more than 73% by 2030, growing from 16.4 million to 28.4 million. Total aircraft operations at MSP are expected to grow by about 40% from 450,000 to 630,000 by 2030. While the current economic recession has resulted in declines in both boardings and operations at MSP since 2005, passenger boardings are expected to return to previous levels in 2013, and operations are expected to return to previous levels in 2019.





E.6 FACILITY REQUIREMENTS

Growth in the number of passengers and aircraft operations will require airport facilities to be improved in order to continue operating in a safe and efficient manner.

The inventory of airport facilities and existing capacity evaluation identified 15 key focus areas for the LTCP Update to evaluate. Each of these focus areas identified existing facilities that are operating inefficiently today or that are expected to operate inefficiently with moderate increases in passenger numbers. The 15 focus areas are:

1. Balancing passenger demand between the two terminals
2. Reallocation of airlines between the two terminals
3. Arrival curbside capacity (Lindbergh Terminal)
4. Public parking (Both Terminals)
5. Wayfinding / Signage for the airport roadways
6. Baggage claim facilities (Lindbergh Terminal)
7. Security Screening Check Points (Lindbergh Terminal)
8. International arrivals (Customs and Border Protection) facilities (Lindbergh Terminal)
9. Regional carrier aircraft gates (Lindbergh Terminal)
10. Refurbishing Concourses E and F (Lindbergh Terminal)
11. Rental car facilities (Both Terminals)
12. Airfield capacity and taxiways
13. The United States Post Office facility (Lindbergh Terminal)
14. Potential development of an airport hotel
15. Air Traffic Control Tower (ATCT) improvements

The analysis concluded that the existing passenger terminal complexes and their landside facilities are not able to accommodate planned forecast growth without expansion. Growth in passenger boardings will prompt additional aircraft gates, parking, roadway improvements and terminal space to allow passengers to enjoy a safe and comfortable airport environment. Balancing passenger demand between the Lindbergh and Humphrey Terminals will result in improved efficiency and customer service of both facilities. This balance can best be achieved

improved efficiency and customer service of both facilities. This balance can best be achieved by utilizing the Lindbergh Terminal to accommodate Delta Air Lines and its partner airlines while relocating all other airlines to the Humphrey Terminal. The aviation activity forecast suggests that this move should occur by 2015.

Though aircraft operations will be growing as well, the existing four-runway airfield is expected to be able to continue operating in a safe and efficient manner without the need for additional runways. Some improvements to taxiways are recommended to help aircraft move around the airfield as they taxi between the runways and the terminal complexes.

E.7 CONCEPTS

Though it is typical for an airport LTCP effort to provide a series of broad organizational concepts for airport development, the nature of this study was to focus on key facilities and develop concepts that would resolve existing and forecast facility deficiencies. A more detailed description, by subject area, is included in the full report and a summary of the recommendations is provided below and shown on **Figure E-1** located at the end of this Executive Summary.

Lindbergh Terminal

- *ADDITIONAL GATES* - Extending Concourse G would provide new gates capable of accommodating domestic or international flights.
- *EXPANDED INTERNATIONAL ARRIVALS (CBP) FACILITY* - New, larger facilities will be provided as part of the Concourse G expansion to accommodate forecasted growth in demand for international flights to MSP.
- *SECURITY SCREENING* - Reconfiguration of security screening areas would improve efficiency and reduce wait times.
- *BAGGAGE CLAIM* - The existing baggage claim hall would be reconfigured with larger, modern baggage claim systems.
- *PARKING* - Additional parking garages would be constructed adjacent to the existing garages to accommodate existing and future parking demand.
- *ARRIVALS CURB* - Enhancements to the curb area would improve capacity and efficiency for arriving passengers to reach shuttles, taxis, and private vehicles.
- *HOTEL* - A site has been identified that would be appropriate for hotel development.

Humphrey Terminal

- *ADDITIONAL GATES* - New gates would be added by extending the passenger concourses to the north and south accommodating up to 26 additional gates.
- *PASSENGER PROCESSING* - Ticketing and baggage claim facilities would be expanded to accommodate additional airlines and passengers.

- **PARKING** - Existing garages would be expanded to accommodate future parking demand.
- **RENTAL CAR FACILITIES** - Accommodations for rental cars would be provided by developing facilities in expanded existing parking garages.
- **ACCESS ROADS** - Post Road and 34th Avenue would be improved and signed to accommodate increasing traffic volumes and simplify circulation.

E.8 FACILITY IMPLEMENTATION SCHEDULE AND COSTS

Improvements must be phased and constructed in response to demand and with consideration for the capital improvement budget. A preliminary phasing plan prepared for the LTCP Update includes four 5-year phases along with very preliminary cost estimates. These costs are for new development only and do not include normal rehabilitation and maintenance efforts that will be required during this period. The costs are based upon planning concepts for the airport. Preliminary design has not been accomplished for any of these projects. The costs therefore, represent the general order of magnitude of costs that could be expected for the proposed development. They are expressed in 2009 dollars, with no allowance for inflation.

- Phase I (2010-2015): Expand Humphrey Terminal and relocate airlines.
Cost Range - \$380 Million - \$445 Million
- Phase II (2015-2020): Modernize and expand Lindbergh Terminal, including a new international arrivals facility.
Cost Range - \$810 Million - \$960 Million
- Phase III (2020-2025): Complete expansion of Humphrey Terminal, balancing passenger loads between the two terminals.
Cost Range - \$620 Million - \$735 Million
- Phase IV (2025-2030): Construct crossover taxiways and access road improvements at Lindbergh Terminal.
Cost Range - \$190 Million - \$225 Million

This phasing plan allows improvements to be implemented over a 20-year period in response to gradual increases in demand. It also allows implementation of improvements to occur with minimal disruption to the day-to-day operation of the airport.

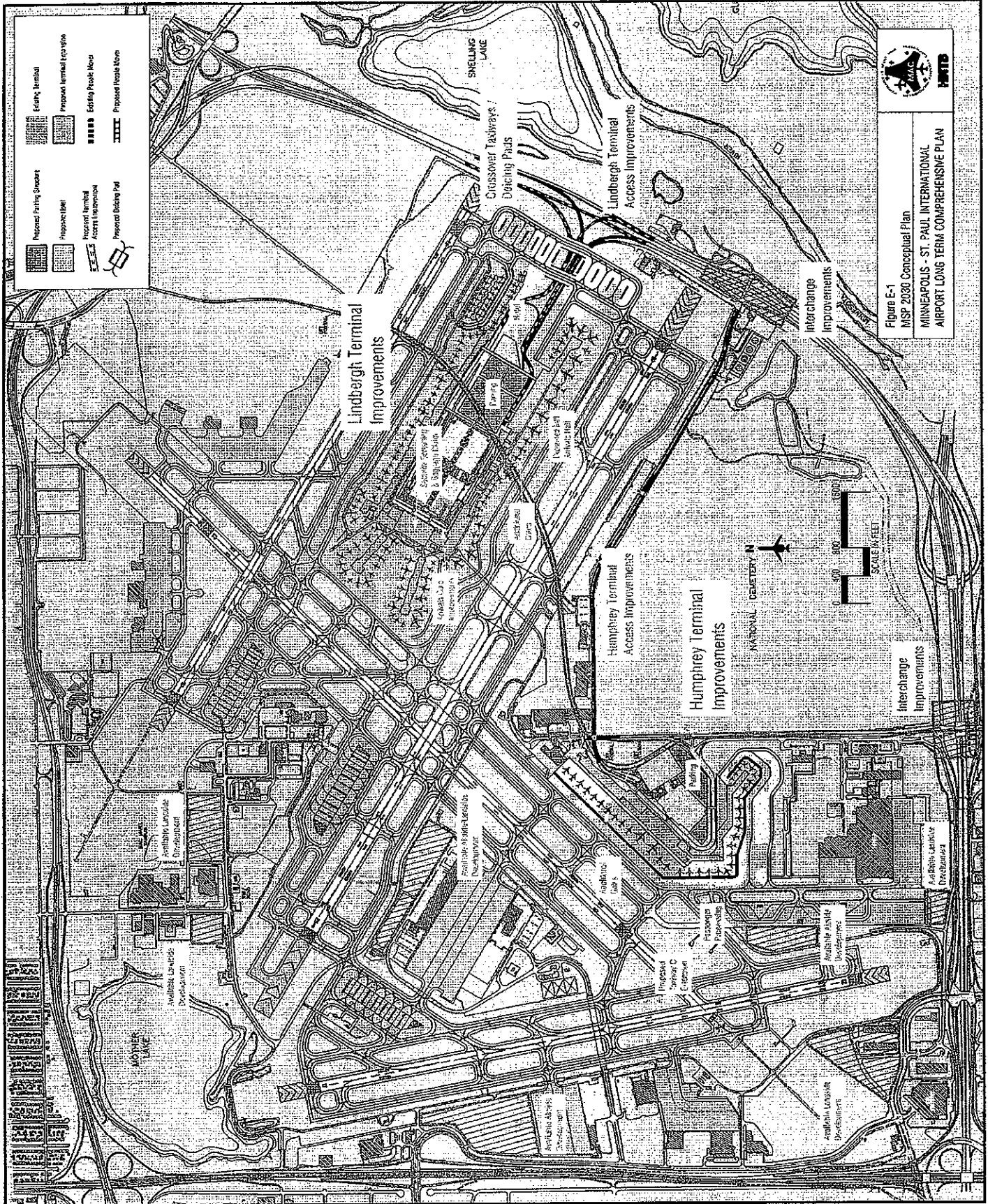
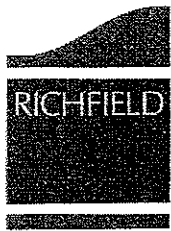


Figure E-1
 MSP 2030 Conceptual Plan
 MINNEAPOLIS - ST. PAUL INTERNATIONAL
 AIRPORT LONG TERM COMPREHENSIVE PLAN





City Manager's Office

May 11, 2010

Metropolitan Council
Attn: Transportation Advisory Board
390 Robert Street North
St. Paul, Minnesota 55101-1805

MAYOR
DEBBIE GOETTEL

CITY COUNCIL
PAT ELLIOTT
TOM FITZHENRY
SUZANNE M. SANDAHL
FRED L. WROGE, JR.

CITY MANAGER
STEVEN L. DEVICH

Subject: Minneapolis/St. Paul International Airport Proposed 2030 Long Term Comprehensive Plan Update

Dear Transportation Advisory Board Members:

Thank you for the opportunity to submit comments on the above referenced Comprehensive Plan update. The City of Richfield has concerns with the projected growth of 76% in passenger boardings and aircraft operations increasing by 40% between 2008 and 2030. The projected increase surpasses even the "high" forecasts (65% increase in passenger boardings and 32% increase in operations) from the Dual Track Study which lead to the 2010 Program. Approval of the 2010 Program was approved with conditions regarding noise mitigation, jobs, headquarters and operational guarantees. Therefore, it is felt that the approval of the Metropolitan Airport Commission (MAC) Long Term Comprehensive Plan (LTCP) should be held to the same requirements of others who are required to submit a Comprehensive Plan to the Metropolitan Council. Those standards should address the impacts associated with all forms of growth at MSP.

The City of Richfield looks to the Metropolitan Council to provide two conditions on their approval of MAC's LTCP. They are:

- Direct MAC to acknowledge noise impacts, outline a mitigation program and include a proposed budget within the LTCP cost estimate for noise mitigation; and
- Condition approval of the plan on shorter five year time increments requiring MAC to submit five year plan updates.

Noise Mitigation

According to the draft MAC LTCP, by 2030 the projections indicate an additional 5600 single-family homes and 3160 multi-family homes from communities surrounding MSP will be located in the 60-64 DNL contours. The projected homes have the potential to be exposed to the same noise levels that

The Urban Hometown

are being addressed by MAC's current mitigation program. Of these, 1,578 single-family and 1,252 multi-family units are located in Richfield.

In 1998 the MSP Noise Mitigation Committee recommended that all homes be mitigated for noise out to the 60 DNL. MAC had concurred with the committee's recommendation, but later withdrew from their commitment, which led to the litigation with surrounding communities and homeowners that was resolved in 2007. It is also important to note that the Met Council's Land Use Compatibility Guidelines show that new single-family homes and major redevelopment of single-family dwellings are incompatible at 60-64 DNL noise levels. The compatibility guidelines also state that infill development and additions are only conditionally approved if added noise attenuation is included. Approximately four communities around MSP have adopted ordinances requiring new homes and additions that were previously treated for noise mitigation to incorporate noise measures equal to what MAC had mitigated the structures to. In effect, the 60 DNL by default has become the region's threshold for airport noise compatibility.

Additionally, the Met Council's Land Use Compatibility Guidelines require, "Airport owner submit long-term comprehensive airport plan or plan update including noise mitigation program for Council review and approval (Appendix L-1)." Despite comments from surrounding communities regarding the exclusion of a noise mitigation program from the proposed LTCP, MAC responded that they would address noise through a Part 150 study if necessary. Since the FAA will not participate in noise mitigation nor even necessarily approve of a Part 150 measure beyond the 65 DNL, a Part 150 Noise Program would be useless since the FAA would not recognize it beyond the 65 DNL.

Proposed Incremental Approval of LTCP

State statute requires MAC to update their comprehensive plan every five years. This is the first update since 1996. Changes to the aviation industry brought by 9/11 attacks, SARS pandemic, bankruptcies, and mergers brought a volatility to the airport environs that made it difficult to plan. Richfield recognizes the challenges that have faced MAC, but in an effort to be more responsive to current and future changes in the aviation industry we ask that Met Council consider approval of the MAC's LTCP in five year increments thereby providing a motivation to reassess and evaluate conditions prior to committing to a direction that may not be prudent or reasonable for MAC, Richfield, and other surrounding communities.

Thank you for the opportunity to submit our concerns about the proposed MAC 2030 LTCP. Should you have any questions about the comments made by the City of Richfield, please feel free to contact Christine Costello, Community

Development Specialist at 612-861-9758 or via email at ccostello@cityofrichfield.org.

Sincerely,



Debbie Goettel
Mayor

DG:cc

Copy:

- Richfield Mayor and City Council
- State Representative Paul Thissen, District 63A
- State Representative Linda Slocum, District 63B
- State Senator Kenneth Kelash, District 63
- MAC Commissioner Lisa Peilen, District C
- Metropolitan Council Representative Polly Bowles, District 5
- Metropolitan Council Sector Representative Denise Pedersen Engen
- Governor Tim Pawlenty

METROPOLITAN AIRPORTS COMMISSION

Minneapolis-Saint Paul International Airport

6040 - 28th Avenue South • Minneapolis, MN 55450-2799

Phone (612) 726-8100

Office of Executive Director



May 18, 2010

TO: Transportation Advisory Board
Metropolitan Council Members

RE: Approval of the MSP Long Term Comprehensive Plan (LTCP) Update

At the Thursday, May 13, 2010 Transportation Advisory Board (TAB) Policy Committee meeting, the City of Minneapolis proposed conditioning the action on the review of the MSP LTCP update with the following three statements:

"Direct MAC to acknowledge noise impacts, outline a mitigation program and include a proposed budget within the LTCP cost estimate for noise mitigation.

Direct MAC to identify an operational threshold at which time they begin to look at long term airfield capacity and alternative solutions to future needs.

Condition approval of the plan on shorter five year time increments requiring MAC to submit five year plan updates."

The third item was approved in a modified form, the second was approved and the first was held over for action at the full TAB meeting on Wednesday, May 19, 2010.

We urge you to reject these conditions.

The Met Council's role in reviewing the Airport Comprehensive Plans (not just MSP, but any airport in the Metropolitan area) is to determine that they are consistent with Metropolitan Policy Guides and consistent with the plans of the surrounding cities.

As it relates to the three conditions posed by Minneapolis, there is no accepted standard for noise mitigation out to the 60 DNL noise contour. Contrary to assertions in their correspondence of May 12, 2010, no such standard exists. In litigation brought against MAC by Minneapolis, Eagan and Richfield associated with MSP expansion under the 2010 LTCP, the cities argued that MAC created a standard for noise mitigation out to the 60 DNL contour. MAC denied that allegation and the Consent Decree that settled the litigation specifically provides that: *"The parties do not intend anything in this Consent Decree to create or constitute any environmental standard, limitation, rule, order, license, stipulation agreement, or permit within the meaning of the Minnesota Environmental Rights Act, Minn. Stat. 116B.02, Subd. 5."* If there is a desire to establish such a standard, all parties including all entities that operate airports, Mn/DOT, the cities, and any other party that is involved in generating or regulating this noise must be

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Transportation Advisory Board
Metropolitan Council Members
May 18, 2010
Page 2

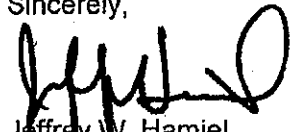
engaged. This is not simply an MSP issue and the TAB, albeit highly respected for its work, is not the venue to establish such a standard by simple conditioning of the MSP LTCP.

Regarding the establishment of a capacity threshold and looking for alternate solutions to future needs – there is no single number that can be established to determine the operational capacity of the airport. It is a function of activity and delay. Future improvements of the FAA systems and airspace design may well extend those numbers. Further, the need, role and location of new airport facilities are Metropolitan Council responsibilities, not MAC's.

Finally, while updates to the MSP LTCP on a regular basis are valid and appropriate, the 20 year plan must be approved for the full 20 year planning horizon. Effective long term planning and development of the airport cannot happen if it is parsed in five year increments.

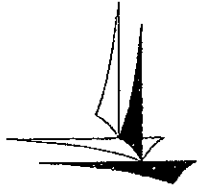
Thank you for your attention to this matter. Please contact us at your convenience if you need any additional information or if we can be of further assistance.

Sincerely,



Jeffrey W. Hamiel
Executive Director

Cc: MAC Commissioners
Peter Bell
Arlene McCarthy



Minneapolis
City of Lakes

Office of the Mayor

R. T. Rybak
Mayor

350 South 5th Street - Room 331
Minneapolis MN 55415-1393

Office 612 673-2100
Fax 612 673-2305
TTY 612 673-3187

May 12, 2010

Metropolitan Council
Transportation Advisory Board Policy Committee
390 Robert Street North
St. Paul, Minnesota 55101-1805

Re: MSP LTCP Update

Dear TAB Policy Committee Members:

Thank you for the opportunity to submit comments on the above referenced comprehensive plan update. The City of Minneapolis has very definite concerns with the projected growth of 76% in passenger boardings and aircraft operations increasing by 40% between 2008 and 2030. These projected increases surpass even the "high" forecasts (65% increase in passenger boardings and 32% increase in operations) from the Dual Track Study leading to the 2010 Program. As you know, approval of that plan came with conditions regarding noise mitigation, jobs, headquarters and operational guarantees. Approval of this plan should similarly be conditioned on offsetting the impacts associated with growth and a tight schedule of reassessment.

We look to the Council to provide three conditions on their approval of this plan:

Direct MAC to acknowledge noise impacts, outline a mitigation program and include a proposed budget within the LTCP cost estimate for noise mitigation.

Direct MAC to identify an operational threshold at which time they begin to look at long term airfield capacity and alternative solutions to future needs.

Condition approval of the plan on shorter five year time increments requiring MAC to submit five year plan updates.

Noise Mitigation

By 2030 MAC projections show an additional 5600 single family homes and 3160 multi-family homes will be located in the 60-64 DNL contours. These are new homes which will be exposed to the same noise levels that are currently being addressed by MAC's current mitigation program. Of these, 3600 single family and 1500 multi-family units are located in Minneapolis.

In 1998 The MSP Noise Mitigation Committee recommended that all homes be noise mitigated out to the 60 DNL. MAC concurred with their recommendation, later backed off from their commitment leading to litigation with surrounding communities and homeowners. Met Council's Land Use Compatibility Guidelines show that new single family homes and major redevelopment of single family dwellings are incompatible at 60-64 DNL noise levels. Infill development and additions are only conditionally approved if added noise attenuation is included. At least four communities around MSP have adopted ordinances requiring new homes and additions to previously treated structures incorporate noise measures equal to what MAC has mitigated to. In effect, 60 DNL is this region's threshold for airport noise compatibility.

MC's Land Use Compatibility Guidelines also require "Airport owner submits long-term comprehensive airport plan or plan update **including noise mitigation program for Council review and approval.**" (Appendix L-1) MAC, however, despite comments from surrounding communities simply responds that they would address noise through a Part 150 study if necessary. Since FAA will not participate in noise mitigation nor even necessarily approve of Part 150 measures beyond 65DNL, a Part 150 Noise Program does this community no good whatsoever.

Capacity

FAA planning guidance recommends that the airport authority address capacity issues (new runway or secondary airport) when an airfield reaches 60-75% of capacity. MC's Transportation Policy Plan similarly states, "When an airport is projected to reach 60% of ASV (Annual Service Volume) it is recommended that planning for improvements begin; when an airport's operations reach about 80% of ASV project programming and implementation should be initiated." The 2008 volume of 450,000 operations is 70% of estimated airfield capacity (640,000) growing to 630,000 operations within the planning period which is 98.5% of estimated airfield capacity. The MAC's response is that NextGen ATC improvements should add capacity. NextGen, however, is billions over budget, more than a decade behind schedule and simply may not be deployed to the extent FAA desires it to be within this timeframe. In short we believe that MAC may be overly optimistic in relying upon ATC upgrades to take care of the capacity, and ultimately, the delay problem.

If MAC chooses not to use FAA guidelines or Met Council's we believe that the Council should direct MAC to identify a threshold at which point they start to evaluate long term capacity alternatives for the region.

Incremental Approval of LTCP

Until it was repealed in 2008, State Statute 473.616 required MAC to update their comprehensive plan every five years. This is the first update since the 1996 Plan approving the 2010 plan. MAC has indicated that there were no significant changes to the 2010 plan and that should remain a top priority. Changes to the industry brought by 9/11, SARS, bankruptcies, and mergers brought a volatility to the airport environs that made it difficult to plan. While we recognize these challenges, the one constant about airlines is that things change. In an effort to obtain greater compliance we ask that Met Council consider approval of the MAC's LTCP in five year increments thereby providing an incentive to reassess and evaluate conditions prior to committing to a direction that may not be prudent or reasonable.

Sincerely,



R.T. Rybak, Mayor
City of Minneapolis



Robert Lilligren, Council Member
City of Minneapolis
TAB Member

CC: Chauncey Case, MC Sr. Aviation Planner
Kevin Roggenbuck, TAB Coordinator



City of Eagan

Mike Maguire
Mayor

Paul Bakken
Cyndee Fields
Gary Hansen
Meg Tilley
Council Members

Thomas Hedges
City Administrator

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The symbol of
strength and growth
in our community.

May 12, 2010

Metropolitan Council
Attn: Transportation Advisory Board
390 Robert Street North
St. Paul, Minnesota 55101-1805

Dear Members of the Transportation Advisory Board (TAB):

Thank you for the opportunity to submit comments to the Board regarding the proposed Minneapolis-St. Paul Airport Long Term Comprehensive Plan (LTCP).

Enclosed is a copy of the letter that the Eagan City Council sent to the Metropolitan Airports Commission, which includes the City's comments and recommendations pertaining to the LTCP. On behalf of the Eagan City Council, the TAB is asked to review the City's enclosed recommendations, and especially consider revisions to the LTCP to address funding for future noise mitigation and consideration of airfield capacity at MSP Airport.

If you have any questions of the City, please feel free to contact Dianne Miller, Assistant to the City Administrator and liaison to the Eagan Airport Relations Commission, at 651/675-5014 or dmiller@cityofeagan.com.

Sincerely,

Thomas L. Hedges
City Administrator

cc: Kevin Roggenbuck, Metropolitan Council
Bert McKasy, MAC Commissioner



City of Eagan

Mike Maguire
Mayor

Paul Bakken
Cyndee Fields
Gary Hansen
Meg Tilley
Council Members

Thomas Hedgas
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in our community.

February 16, 2010

Ms. Jenn Felger
MAC Planning and Environment
6040 28th Avenue South
Minneapolis, MN 55450

Dear Ms. Felger:

Thank you for the opportunity to comment on the proposed 2030 MSP Long Term Comprehensive Plan (LTCP). The Eagan City Council, per the recommendation of the Eagan Airport Relations Commission, approved the following comments at the February 16, 2010 City Council meeting.

Noise Impacts

The draft LTCP forecasts 40% growth in annual aircraft operations by 2030, from 450,000 to 630,000 operations. Based on the increase in operations, the draft plan includes 2030 projected noise contours (Figure 5-4). These projected 60 DNL noise contours depict noise levels in portions of Eagan and other communities extending well beyond blocks that have previously qualified for noise mitigation funds.

The Metropolitan Airports Commission (MAC) has a history of proactively addressing noise impacts on residential area through noise mitigation programs. However, the draft LTCP does not discuss additional residential noise mitigation, nor does it state MAC's anticipated expenditures towards noise mitigation through 2030. According to the LTCP projections, an additional 536 single and multi family homes in Eagan would be added to the 60-64 DNL contours. Given the dramatic increase to the noise contours over southwest Eagan, which is made up of predominately residential homes that were built well before the decision was made to build Runway 17/35, the City of Eagan strongly recommends that the final version of the LTCP outline a noise mitigation approach that would apply to all newly impacted blocks. Specifically, the City advocates that those homes being added to the 60-64 DNL contours receive, at minimum, the same level of noise mitigation as those homes that received mitigation under the 2007 legal settlement (with an adjusted funding allocation per the CPI).

Moreover, the City of Eagan has understandable concerns with the extension of the noise contours, and corresponding increase in operations, using Runway 17/35. This concern is exacerbated when the noise contours over the Eagan/Mendota Heights Corridor are proposed to shrink significantly. How and why is it that the contour "lobe" is proposed to increase so dramatically off of 17/35, while decreasing over the Corridor? Is the proposed contour extension over southwest Eagan a direct result of additional gates being added to the Humphrey Terminal? Additionally, Figure 5.9 shows that projected runway use in 2030 calls for Runway 17 to be used for 30.3% of all departures, the highest percentage of all runways. Furthermore, Runway 17 is proposed to be used for 25.6% of all nighttime departures, which well exceeds the forecasted use of both 12L and 12R. These projections directly conflict with the approved Runway Use System (RUS) at MSP, which calls for the parallel runways to serve as the first priority for both day and evening departure operations. How will the MAC address this conflict between the 2030 runway use projections and the approved RUS?

While the residents living in and around the Corridor would undoubtedly appreciate noise relief, the City of Eagan has taken the long held public policy decision to plan and guide the Eagan/Mendota Heights Corridor for noise compatible uses. Furthermore, the legal settlement in 2007 ensured that those residents living in and around the Corridor received the noise mitigation they deserved. As such, Eagan strongly encourages the MAC to work with the FAA in the coming years to ensure that the RUS is adhered to and the Corridor is used to the greatest extent possible so as not to place undue burden on the predominately residential areas of Eagan, including those homes under the flight paths of 17/35.

During discussions with the Noise Oversight Committee regarding the LTCP, MAC staff communicated their intent to revisit the LTCP operational forecasts and corresponding noise contours in five years (2015) in hopes that the economy and airline industry will have stabilized at that point so as to provide a more accurate forecast. The City of Eagan recognizes that forecasts are difficult during this time of economic upheaval, and will anticipate a thorough review of the operations and contours in five years, or as soon as the economy and airline industry stabilize. Once that stabilization has occurred, the City asks that the MAC undergo a formal Part 150 process to ensure that the noise environment and corresponding noise mitigation program can be evaluated accordingly.

Land Use

In light of the proposed 2030 contours included in the LTCP, the City of Eagan reviewed its own Comprehensive Guide Plan, and specifically the City's Noise Attenuation Construction ordinance.

The City of Eagan has adopted land use policies through its Comprehensive Guide Plan and construction regulations through its zoning code to minimize the introduction of substantial new areas of noise sensitive uses within the 2008 Policy Contours and to require sound attenuation construction practices where appropriate. The City cannot implement modifications of the Policy Contours unless and until the Metropolitan Council takes action in that regard. The City will monitor the Met Council review of the MSP LTCP and revisit these topics as may be necessary once that review has been completed.

Airfield Capacity

The LTCP states that the existing four-runway airfield configuration is expected to be able to continue operating in a safe and efficient manner without the need for additional runways.

According to the operation projections in the LTCP, there were over 450,000 operations in 2008. Airport planning guidelines (FAA Order 5090.3c) state that an additional runway or supplemental airport planning process begins when the airfield reaches 60-75% of annual capacity, which is a threshold that would be reached at MSP when operations exceed 480,000 operations per year. Additionally, statements have been made to lead communities to believe that congestion levels at MSP Airport are on track to exceed delay levels of 10 minutes per operation. In light of the operation levels being predicted for MSP out to 2030, at what point will the MAC address airfield capacity concerns, and is there is a optimum size or activity level for MSP? Additionally, what considerations have been made in the long term planning process regarding the possibility for the construction of a 3rd parallel runway?

MSP Infrastructure

The City of Eagan very much appreciates the ongoing commitment the MAC has made to improve the infrastructure at MSP Airport. Eagan continues to support the efforts of the MAC to strengthen the presence of MSP Airport through improvements to its facilities, parking structures, and transportation system. As an employment and transportation hub, Eagan stands to benefit significantly from an economic development standpoint, and

encourages the MAC to continue reinvesting in MSP Airport. Furthermore, as the City promotes its goal of reducing energy and promoting environmental sustainability, we encourage the MAC to continue its efforts to utilize sustainable building practices as expansion and reinvestment plans for MSP take shape.

Again, thank you for the opportunity to comment on the proposed 2030 LTCP. Should you have any questions about the comments made by the City of Eagan, please feel free to contact Dianne Miller, Assistant to the City Administrator, at 651/675-5014.

Sincerely,

A handwritten signature in cursive script that reads "Mike Maguire". The signature is written in dark ink and is centered below the word "Sincerely,".

Mike Maguire
Mayor

cc: Eagan's Legislative Delegation
Dan Wolter, District 15 Metropolitan Council Representative
Wendy Wulff, District 16 Metropolitan Council Representative
Governor Tim Pawlenty



City of Eagan

Mike Maguire
Mayor

Paul Bakken
Cyndee Fields
Gary Hansen
Meg Tilley
Council Members

Thomas Hedges
City Administrator

Municipal Center
3830 Pilot Knob Road
Eagan, MN 55122-1810
651.675.5000 phone
651.675.5012 fax
651.454.8535 TDD

Maintenance Facility
3501 Coachman Point
Eagan, MN 55122
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651.675.5360 fax
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www.cityofeagan.com

The Lone Oak Tree
The symbol of
strength and growth
in our community.

June 3, 2010

Metropolitan Council
Attn: Metropolitan Council Members
390 Robert Street North
St. Paul, Minnesota 55101-1805

Dear Council Members:

The City of Eagan has provided ongoing comments to our Metropolitan Council delegation, as well as the Transportation Advisory Board, regarding the proposed Minneapolis-St. Paul Airport Long Term Comprehensive Plan (LTCP).

It has come to the City's attention that a recommendation has been made by staff of the Metropolitan Council with regard to the LTCP that noise impacts should be reviewed through environmental review only to the 65 DNL contour line. As you can see from the 2030 forecasted contours that are included in the LTCP, there are thousands of homes that will be located between the 60-64 DNL contours, which should be eligible for mitigation based on the fact that the regional standard for determining eligibility has long been the 60 DNL contour. In Eagan's case in particular, if the threshold for noise mitigation eligibility is changed from the 60 DNL to the 65 DNL, there would be 342 single family homes and 104 multifamily homes that would not be considered for mitigation.

History clearly demonstrates that the 60 DNL is the threshold for which noise mitigation should be extended around MSP Airport. In the Part 150 documents submitted by the Metropolitan Airports Commission (MAC) in 1996, 2001, and 2004, the 60 dB was used as the standard for eligibility for the MAC Sound Insulation Program. To demonstrate this point, the following is a statement from the 2001 Part 150 submittal:

"For this Part 150, DNL's equal to and greater than 60 dB were used for assessing community noise impact. This Part 150 Update considers a standard of 60 dB for eligibility for the MAC Sound Insulation Program for the following reasons:

The 1996 MSP Noise Mitigation Committee recommended that sound insulation should be provided to residents within the 60dB DNL contour.

Minnesota legislation dealing with the Dual Track Planning Process Environmental Impact Statement required MAC to make a recommendation to the State Advisory Council on Metropolitan Airport Planning. The legislation stated that "the recommendation shall

examine mitigation measures to the 60 Ldn level." Therefore, the State of Minnesota Advisory Council on Metropolitan Airport Planning, pursuant to the Legislature's direction to review the recommendation and comment to the Legislature, reviewed the recommendation and concurred with the Commission's recommendation.

MC Land Use Policy guidance indicates that residential land use within the 60 dB DNL contour is inconsistent without sound attenuation."

While the 2001 Part 150 was withdrawn in 2002, the next Part 150 submitted by the MAC in 2004 also used the 60 DNL as the threshold for all corrective and preventative land use measures. Furthermore, an exhaustive settlement was reached in 2007 to provide \$127 million in mitigation to homes in the 2007 60-64 DNL contours, and also provided additional monetary reimbursements to homes that were previously included in the 2005 60-64 contours.

As the Metropolitan Council's Transportation Committee and Council as a whole continue their dialogue about the MSP LTCP, the City of Eagan strongly encourages you to adhere to the historic precedent of utilizing the 60DNL as the threshold for noise mitigation. In Eagan's case, almost every home that is included in the forecasted 2030 DNL 60-64 contours was built well before the decision was made to expand the airport. Furthermore, as nearly 500 homes in the 60-64 DNL contours have already received mitigation (or will in the coming year) as a result of the legal settlement, how can the MAC or Metropolitan Council justify not providing that same level of mitigation to homeowners in the future who will experience the same or greater noise impact?

Thank you in advance for your consideration of Eagan's comments and recommendations pertaining to the LTCP. If you have any questions of the City, please feel free to contact Dianne Miller, Assistant to the City Administrator and liaison to the Eagan Airport Relations Commission, at 651/675-5014 or dmiller@cityofeagan.com.

Sincerely,



Mike Maguire
Mayor

cc: Kevin Roggenbuck, Metropolitan Council
Bert McKasy, MAC Commissioner



METROPOLITAN AIRPORTS COMMISSION

Minneapolis-Saint Paul International Airport

6040 -28th Avenue South • Minneapolis, MN 55450-2799

Phone (612) 726-8100

MEMORANDUM

TO: Metropolitan Council Transportation Advisory Board

FROM: Dennis Probst, MAC Deputy Executive Director – Planning and Environment

SUBJECT: MSP LTCP Update

DATE: May 17, 2010

This memorandum provides background information and analysis of issues raised by three local communities concerning the Metropolitan Council's review of the Minneapolis-St. Paul International Airport's Long Term Comprehensive Plan (LTCP) Update.

The Metropolitan Airports Commission (MAC) recognizes the communities concerns, and believes, based on in-depth analysis, legal documentation and federal planning documents for airports, that the requested conditions for Metropolitan Council consistency approval are unnecessary. The MSP Airport LTCP process is intended to provide an avenue to identify long range planning of projects to meet the aviation transportation needs of the region and is not the appropriate venue to predetermine mitigation measures, operational thresholds or limit the LTCP to a five year planning horizon.

Each issue raised by the communities is quoted below along with detailed information from numerous federal, state and legal resources that support MAC's position that the LTCP Update submitted to the Metropolitan Council is appropriate for a Council consistency approval action.

(1) Noise Mitigation

Minneapolis request "Direct MAC to acknowledge noise impacts, outline a mitigation program and include a proposed budget within the LTCP cost estimate for noise mitigation."

The LTCP Update review process is not the appropriate venue for the detailed analysis of environmental impacts and the formulation of mitigation strategies.

The MSP Airport LTCP process is intended to provide a basis to identify long range planning of projects to meet the aviation transportation needs of the region. These projects will then be proposed for development and further review as part of a purpose and need in follow-on environmental evaluation processes and the alternatives that will be carried forward into follow-on MEPA and NEPA evaluations.¹ The FAA's final determination of the preferred alternative is completed as part of the NEPA process, which will include detailed analysis of the environmental impacts and recommended mitigation costs to address those impacts.

"The airport sponsor and the FAA should always complete the following prior to commencing preparation of an EIS or EA."²

- "Local aviation forecasts that are current and approved by the FAA
- Justification of the scope and timing of the projects planned facilities based on airport planning, operational requirements, and design standards
- Identification and consideration of all reasonable planning alternatives (within the sponsor's or FAA's jurisdiction), eliminating (and documenting) those not meeting the stated aeronautical need. If an alternative does potentially meet the aeronautical need, but is not considered reasonable, provide sufficient explanation as to why not
- Tentative identification of studies or other information likely required for later Federal action, as well as appropriate State and local agencies, Indian tribes, private persons and organizations likely to have an interest in the project."³

The present MSP LTCP Process has addressed the above requirements; State and Federal environmental review documentation will precede implementation of any project that may arise from the Draft MSP 2030 LTCP. As part of the NEPA and MEPA evaluation processes the alternatives analysis will include detailed consideration of the environmental impacts and the related mitigation costs associated with respective alternatives, which will factor in the determination of the appropriate development option.⁴ Such environmental review is the appropriate mechanism for evaluating any environmental impact of the project and possible mitigation measures. In the case of airport noise, mitigation may include a noise analysis under 14 C.F.R. Part 150.

¹ AC 150/5070-6B, pg. 113.

² AC 150/5070-6B, pg. 114.

³ AC 150/5070-6B, pg. 114.

⁴ AC 150/5070-6B, pg. 118.

The Part 150 process takes a comprehensive approach to address noise impacts at the nation's airports. It includes preventative noise mitigation measures that focus on reducing the noise impact through measures such as departure and arrival procedures, runway use, voluntary nighttime limits etc. and corrective land use measures such as sound buffers, land use planning, building performance standards, purchase guarantees and finally sound mitigation.

Although the noise contours around MSP may grow in the future as a result of increased operations, it is probable that the number of impacted homes within the noise contours at MSP will actually be reduced, in a forecasted scenario, as a result of the proposed action in the Draft MSP 2030 LTCP. This is likely by virtue of increased use of Runway 17/35 and an increase in operational efficiencies that would reduce delay and related operational spill over into the nighttime hours. Moreover, there will be opportunity to focus that growth, to the greatest degree possible, over compatible land uses and away from residential areas as part of the environmental review documentation. This process will likely include more development and implementation at MSP of departure and arrival procedures in the future that utilize advanced aircraft navigation technology. These efforts would build on the progress already made in this area by the NOC and the MAC.

There is no local standard establishing a noise mitigation requirement in the 60DNL noise contour around MSP by virtue of the Metropolitan Council's Transportation Policy Plan Land Use Compatibility Guidelines.

The standard typically applied by the FAA to establish a local noise standard that is more restrictive than the Federal criteria is evidence that the proposed local standard is recognized in local land use planning and development approval processes. The Land Use Compatibility Guidelines in the Transportation Policy Plan (TPP) do not establish such a standard.

The TPP's Land Use Compatibility Guidelines for Aircraft Noise lists "Infill Development and Reconstruction or Additions to Existing Structures" as being conditional. This designation means "uses that should be strongly discouraged; if allowed, must meet the structural performance standards, and requires a comprehensive plan amendment for review of the project under the factors described in Table 5, of Appendix H. This language does not establish a standard that requires sound insulation mitigation.

The degree to which the cities around MSP have complied with the TPP provisions in the development of their respective Comprehensive Plans, and the Council's enforcement of the TPP guidelines in the comprehensive planning approval process, are the appropriate indicator of the possible

existence of a local standard in the context of the TPP. The reality is that there are likely no communities around MSP that have approved Comprehensive Plans that are in complete compliance with the TPP and mitigation practices at MSP.

Past MAC actions related to the Dual-Track Airport Planning Process, past Part 150 Program mitigation activities and the Consent Decree do not create a 60 DNL mitigation standard for MSP.

As is detailed in the City of Minneapolis, et al., v. MAC litigation record, the MAC believes that the actions related to the Dual-Track Airport Planning Process and past Part 150 Program mitigation activities do not create an environmental quality standard, or a local standard for mitigation out to the 60 DNL noise contour.

Moreover, the Consent Decree addresses this question explicitly in the context of the Decree, under VIII. GENERAL PROVISIONS, 8.1 Effects of this Consent Decree Release of Claims, point K states the following:

"The parties do not intend anything in this Consent Decree to create or constitute any environmental standard, limitation, rule, order, license, stipulation agreement, or permit within the meaning of the Minnesota Environmental Rights Act, Minn. Stat. 116B.02, Subd. 5."

(2) Capacity Analysis

Minneapolis request – "Direct MAC to identify an operational threshold at which time they begin to look at long term airfield capacity and alternative solutions to future needs."

During the LTCP Public Hearing process, a number of communities expressed concern that MSP is reaching an operational level, as defined in the FAA Order 5060.3c, that "requires" MAC to begin planning for an additional runway or supplemental airport during this planning horizon.

The following discussion will help to clarify, not only this 1983 FAA Order language, but also incorporate a number of other more current documents that support the fact that the current airfield configuration will meet the operation needs at MSP through the 2030 planning horizon.

The 1983 FAA Order 5060.3c does identify new runway and replacement/supplemental airports when activity levels reach 60% to 75% of annual capacity, along with other potential improvements, however the cities do not mention the Remarks section that state "Timing depends upon forecasts, type of airport, location (metropolitan area), cost and other factors."

This LTCP takes into consideration the other elements associated with a comprehensive approach to serve the Twin Cities Metropolitan Area.

In 1993, the FAA completed the MSP Capacity Enhancement Plan. This document was commissioned by FAA to evaluate a number of alternatives for airfield development to address "problems posed by congestion and delay with the National Airspace System". The study looked at three different operational levels; Baseline of 420,390, Future 1 of 530,000 and Future 2 of 600,000. Associated with each level, FAA evaluated a number of airfield improvements that would help to reduce delay at each level of activity. The operational levels did not establish a maximum capacity at MSP, but rather identified the delay reduction benefit associated with each airfield improvement. Additionally, the study also looked at Facilities and Equipment Improvements and Operational Improvements as interdependent variables that impact delay.

The study results identified maximum delay reduction with the implementation and construction of both Runway 17/35 and a North Parallel Runway, increased runway instrumentation to increase capacity during instrument weather conditions and other ATC operations improvements. The delay level for this configuration was estimated to be approximately 3.6 minutes per operation versus 4.8 minutes with only Runway 17/35.

In 2004, prior to the opening of Runway 17-35, MSP recorded over 541,000 annual operations with an approximate delay of seven minutes per aircraft from primarily the two parallel runways. Annual operational levels have since declined every year since this peak and declined to 432,604 operations in 2009. In fact, today's operational levels and twenty year forecast projections are very similar to the operational levels and future projection levels that existed in the 1989 to 1996 Dual Track Planning time period. This legislatively mandated planning process concluded in 1996 with the Legislative mandate for MAC to implement the MSP 2010 Long Term Comprehensive Plan which included the construction of Runway 17/35, to meet then forecasted operational levels which included MAC's High Forecast of over 640,000 operations. The current LTCP forecasts operational levels of 630,000 annual operations. There are no compelling reasons to believe that the Legislature's decision that MSP could be successfully developed and operated at these very similar operational levels has changed.

Additional airfield operational level analysis was also reported and analyzed in the 2015 Terminal Expansion Project Draft Environmental Assessment. In this study, operational levels up to 723,000 annual operations were evaluated with an average anticipated delay of 12.7 minutes per operation. This level of delay did not establish an airfield capacity limit, but a level of delay that is considered to be the maximum level tolerable based on a review of the nation's most congested airports.

The 1998 FEIS estimated that the construction of Runway 17-35 could add approximately 25% airfield capacity at MSP. Additional capacity enhancements are also expected with the implementation of elements of the FAA's NextGen Air Traffic Control system. Improvements in the NextGen Air Traffic Control system include: (1) advanced Traffic Management Advisor (TMA) to allow controllers to sequence aircraft more efficiently; (2) Cockpit Display of Traffic Information (CDIT) – Enhanced Flight rules which will enable specially-equipped aircraft to maintain visual approaches even in marginal weather conditions; and (3) RNAV and Required Navigation Performance (RNP) procedures that will enable aircraft to fly precision departure and approach paths. The expected capacity enhancements of FAA's NextGen development is supported in the most recent publication of FAA's biennial update to the National Plan of Integrated Airport Systems (NPIAS) report.

The 2007-2025 Capacity Needs in the National Airspace System May 2007 report is required by U.S.C. Title 49, Section 47103. FAA's Terminal Area Forecast (TAF) is used to project operational levels for airports across the nation. At MSP, the TAF forecast for 2030 is 720,000 annual operations. Although this operational level is higher than projected by MAC, the FAA's TAF provides a conservative assessment by which the airfield capacity capabilities can be assessed. In this report the FAA evaluated the 35 busiest airports in the nation and MSP was modeled in concert with other airports in the National Airspace System (NAS) with respect to capacity needs.

The Future Airport Capacity Task (FACT 2) team identified a number of U.S. airports that can be expected to require additional capacity in the future if demand reaches forecast levels. MSP was not mentioned in the 2007 or 2015 planning horizons. In 2025, MSP benefits from "ATC improvements and reduced delays at other airports" according to the FACT 2, 2007 analysis, and therefore MSP and the Twin Cities area is not identified as an area in need of capacity improvement according to FAA.

The Draft MSP 2030 LTCP anticipates operational level recovery to the 2004 level of approximately 541,000 annual operations to occur in 2019 to 2020 time period. An FAA Capacity Study update may be appropriate when the operations levels recover to previous high historical levels of approximately 540,000 operations and a clear upward trend is established. The FAA's planning guidelines will be considered as part of the MAC's future planning process. Finally, the MAC will continue to conduct periodic updates of the LTCP, which will include updated forecasts for operations and delay, and through this process will identify future airfield capacity needs and potential solutions.

(3) Plan Updates

Minneapolis request - "Condition approval of the plan on shorter five year time increments requiring MAC to submit five year plan updates."

The MAC has legislative authority as well as a responsibility to plan and develop MSP to meet the forecasted needs of not only the Metropolitan Service Area, but the region as well. To accomplish this, MAC must be able to adequately and efficiently plan for the short, medium and long range development. Airport Master Plans need to support the capital improvement programs in the near term and conceptual development needs in the long term.

An approved longer range plan is also necessary to insure that projects are fully evaluated during the environmental review process rather than limited due to a narrow five year window. A 20 year plan is consistent with other state agency, county and municipal planning horizons and is also consistent with the Metropolitan Council's update requirements. Based on these sound planning principles, approval for a 20 year planning period is appropriate.



May 18, 2010

Transportation Advisory Board
Metropolitan Council
390 Robert Street North
St. Paul, Minnesota 55101 - 1805

TAB Members,

On Wednesday, May 12^h, before last Thursday's TAB Policy meeting, the City of Minneapolis presented a letter requesting three conditions of approval be included when the Metropolitan Council reviews the Metropolitan Airport's Commission's MSP Long Term Comprehensive Plan update. Minneapolis' proposed conditions are:

- Noise mitigation program and budget;
- Operational threshold that would trigger a study of long term airfield capacity and options for future airport needs;
- Approve the LTCP in five-year increments.

The Bloomington City Council's understanding is that the recommendation to the full TAB meeting on May 19 will include Minneapolis's second and third proposed conditions.

The Bloomington City Council recommends that when the full TAB considers the MAC's Long Term Comprehensive Plan, that TAB should delete the long term airfield capacity and options study trigger proposed by the City of Minneapolis and recommended by TAB's Policy Board.

The Bloomington City Council feels strongly about this recommendation. MSP International Airport is an asset to the entire Metropolitan area as well as to the Upper Midwest market it serves.

While the airport's location is often looked at as a transportation issue, it is much more than that. MSP's location is an important determinate of the economic activity patterns in the Metropolitan area and the surface transportation network that serves our economy. In 1988 the Metropolitan Council's Minneapolis/St. Paul International Airport Adequacy Study Advisory Task Force recommended identifying and selecting a new airport site. This Metropolitan Council recommendation resulted in the Metropolitan Airport Planning Act of 1989 that started the "dual track process." After eight years of very expensive study, in 1996 the Legislature and Governor agreed to halt further study of a new airport location and to invest several billion dollars in enhancements at the existing MSP location. For every billion dollars of public investment based on that location decision, several billion dollars of private investment have assumed that the State has made a decision on the location of its airport serving the Minneapolis-St. Paul metro region.

In retrospect, the State's 1996 decision was exactly the right one for the economic times that followed. If a decision to relocate MSP airport had proceeded:

- Minnesota would have created a multi-billion debt load that the financially strapped air transportation industry could not pay;
- MAC would have built a new facility relying on operations and passenger forecasts that decreased from 2001 to 2010 instead of increasing;
- A new airport in Dakota County would have required significant highway construction resources just to connect it to the rest of the Metropolitan area and this remote location would probably have been too expensive to connect to light rail transit;
- A remote airport location would have increased total vehicle miles traveled in the metro area by removing the airport's center of economic activity from the I-494/694 ring.

The last time the metro area embarked on a study of airport location, the decision was made by the Metropolitan Council, the Legislature and the Governor – and for good reason, because the issues involved in such a study are much broader than the number of flights and passengers that pass through MSP's portals. The State, the airline and hospitality industries, and other economic activities that rely on air transportation have made very significant investments in the MSP current site.

The Bloomington City Council also comments that a noise mitigation program and budget has merit as part of the MSP LTCP.

While aircraft operations at MSP have noise impacts, the Airports Commission and cities around MSP have worked hard during the last 20 years to mitigate these impacts. In fact, MSP Airport is considered a best practices leader among United States airports. MAC and the local FAA tower are leaders in aircraft operation procedures that mitigate noise at the source and MAC is a leader in mitigation at the receiver by insulating homes and schools and moving noise sensitive land uses in cooperation with surrounding cities.

As part of the City of Minneapolis's letter that was presented to TAB's Policy Committee, the City of Minneapolis proposed, though it did not make the final recommendations of the TAB Policy Committee, that a noise mitigation budget be included in the LCTP. Given that the 60 DNL contour has been recognized by Metropolitan Council policy and MAC noise mitigation practice as "this region's threshold for airport noise compatibility", inclusion of a budget for noise mitigation within the LTCP is appropriate. The Bloomington Council also encourages MAC to update the Part 150 and low frequency noise studies as needed when the forecast operations volumes and fleet mixes are forecast to change in a way that could add residences to noise impact areas.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene Winstead", written over a large, stylized circular scribble.

Gene Winstead

Mayor

cc: City Council
Lisa Peilen, Metropolitan Airports Commission, District C
Polly Bowles, Metropolitan Council, District 5 City Manager
Kevin Roggenbuck, TAB Coordinator
Chauncey Case, Metropolitan Council Senior Aviation Planner
Bloomington City Manager, Community Development and Public Works Directors



CITY OF MENDOTA HEIGHTS

June 8, 2010

Metropolitan Council
Richard Aguilar
390 Robert Street North
St. Paul, MN 55101

Dear Richard:

The City of Mendota Heights has a long history of working with the Metropolitan Airports Commission (MAC) and providing input that we believe to be positive for both the city and the airport. It has come to our attention that a recommendation has been made by staff of the Metropolitan Council at the behest of MAC with regard to the proposed Minneapolis-St. Paul Airport Long Term Comprehensive Plan (LTCP) that noise impacts should be reviewed through environmental review only. You need to be aware that the only threshold recognized through the EAS and the FAA is the 65 DNL. Every finding since the dual track process was ended has recommended that the 60 DNL be the threshold for receiving mitigation and this was resoundingly upheld in the most recent lawsuit between the cities surrounding the airport and the MAC.

History clearly demonstrates that 60 DNL is the threshold for which noise mitigation should be extended around the MSP Airport. The Mendota Heights Aircraft Noise Attenuation Ordinance requires that new or redeveloped portions of buildings within the city be constructed with materials and in such a manner that aircraft noise is attenuated by the structure to the interior level which has no adverse impact on the health, safety and general welfare of the residents, all in accordance with the Metropolitan Council's guidelines for land use compatibility with aircraft noise.

Mendota Heights supports language that has been discussed with representatives from the City of Minneapolis in regard to the cumulative noise analysis portions of the LTCP. The language reads as follows:

Five Year Review-Noise Analysis: Each five year comprehensive plan update must include a cumulative noise impact analysis. The analysis must be based on reasonable assumptions of the type and frequency of aircraft operations, night time operations, flight patterns, and runway utilization. The analysis must (1) portray impacts at various noise levels including the 60 DNL, (2) identify at the various thresholds the number and location of the impacted residential properties and (3) discuss mitigation options which will substantially reduce noise impacts and the cost of each option.

The Mendota Heights City Council, Airport Relations Commission and city staff are all in support of this language. The importance of consistency in recognizing the 60 DNL line as the threshold for which noise mitigation be extended is very important to Mendota Heights.

Thank you in advance for your consideration of Mendota Heights' comments and the recommendation pertaining to the LTCP. If you have any questions please feel free to contact me at 651-452-1850. Thank you for your time on this important matter.

Best wishes,



David J. McKnight
City Administrator

Cc: Mendota Heights Mayor and City Council
Mendota Heights Airport Relations Commission
~~Metropolitan Council Members~~
File

June 10, 2010

R.T. Rybak, Mayor
City of Minneapolis
350 South 5th Street – Room 331
Minneapolis, MN 55415-1393

Re: MSP Long Term Comprehensive Plan Update

Dear Mayor Rybak,

Thank you for speaking to the Transportation Advisory Board at its May 19 meeting on the MSP Long Term Comprehensive Plan (LTCP) Update. The Council appreciates the importance of the airport and its long term plans to the City of Minneapolis, as well as to the other cities neighboring the airport.

Metropolitan Council members, as well as staff, have had the opportunity in the past few weeks to meet with City of Minneapolis Council members and staff. In anticipation of upcoming Council action on the MSP LTCP, I am taking this opportunity to follow-up on the recent correspondence and conversations on the specific items of concern to the city.

The recommended action is for the Council to approve the MSP LTCP with the following items being addressed in the LTCP prior to final adoption by the MAC:

- MAC should update the LTCP every five years with the next update in 2015.
- MAC should initiate a capacity study two years in advance of when MSP is expected to have 540,000 annual operations and incorporate the results of this study into the next subsequent LTCP update. The 540,000 operations level is recommended because it is highest level of operations ever achieved at the MSP airport (in 2005).
- MAC should initiate an FAA Part 150 study update (which includes a comprehensive noise analysis and mitigation program), in consultation with the MSP Noise Oversight Committee (NOC), when the forecast level of operations five years into the future exceeds the levels already mitigated as a result of the Consent Decree (582,366 annual operations). The results of this study should also be incorporated into the next subsequent LTCP Update.

The second and third requirements are tied to operation levels rather than a specific year given the general decline and volatility in airport operations over the last decade. More detail on the above recommendations is presented in Council Business Item #2010-214 which is posted on the Council's website (www.metrocouncil.org) as part of the June 14, 2010 Transportation Committee agenda.

Several of the cities adjacent to MSP, including Minneapolis, have suggested that noise impacts resulting from the 2030 plan should be mitigated to a "regional standard" of 60 DNL, rather than the 65 DNL standard used by the FAA. I want to clarify that the Council does not believe a noise mitigation standard of 60 DNL has been established for the Twin Cities region. Most recently, the Consent Decree resulting from the litigation brought against MAC by Minneapolis, Eagan and Richfield associated with the MSP expansion under the 2010 LTCP specifically stated that "*The parties do not intend anything in this Consent Decree to create or constitute any environmental standard, limitation, rule, order, license, stipulation agreement or permit within the meaning of the Minnesota Environmental Rights Act, Minn. Stat. 116B.02, Subd. 5.*" However, the Part 150 Update noted above will evaluate noise impacts out to the 60 DNL.

While the Metropolitan Council has the authority to ensure that the MAC LTCP is consistent with the metropolitan development guide, the Council does not have the authority to establish a regional noise mitigation threshold.

Again, I appreciate the commitment and input provided by the City of Minneapolis to this planning effort. If you have further questions, please contact Arlene McCarthy at 651-602-1754.

Sincerely,



Thomas H. Weaver
Regional Administrator

cc: Metropolitan Council Members
Robert Lilligren, Minneapolis City Council
Sandy Colvin Roy, Minneapolis City Council
Bill Hargis, TAB Chair
Arlene McCarthy, Director, Metropolitan Transportation Services
Gene Ranieri, City of Minneapolis
Dennis Probst, MAC Deputy Executive Director Planning and Environment



Minneapolis
City of Lakes

City Council

John M. Quincy
Council Member, Eleventh Ward

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Minneapolis MN 55415-1383

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john.quincy@ci.minneapolis.mn.us

June 14, 2010

Mr. Robert McFarlin, Chair
Metropolitan Council Transportation Committee
390 Robert Street North
St. Paul, MN 55101-1805

Re: MSP LTCP

Dear Chair McFarlin and Committee Members,

We are grateful to the Metropolitan Council staff and members for their willingness to meet with city elected officials and staff regarding the long term comprehensive plan (LTCP) for the Minneapolis St. Paul airport (MSP). We appreciate the effort to propose actions to address the issues of periodic plan review, capacity planning and noise, and noise mitigation raised by our city and Richfield, Eagan and Mendota Heights.

We have reviewed the proposed action items before your committee and offer the following.

- 1. Five Year Review:** The Metropolitan Council's (council) enabling statute and policies contain numerous times for periodic review of policy and comprehensive plans. We support the council's recommendation that the LTCP, like other comprehensive plans, be subject to a scheduled update and review. The five year cycle seems appropriate given the fluid nature of the aviation and related industries. We would further suggest that the five year review be codified in statute.
- 2. Capacity Study:** We support the requirement that the Metropolitan Airports Commission (MAC) initiate a capacity study two years prior to the airport reaching 540,000 operations. We also support that the study be included in the next five year update.
- 3. Noise and Noise Mitigation:** The council's recommendation regarding noise and noise mitigation is a welcomed response to an issue with a resolution that will probably be decided in forums beyond these chambers. We support the requirement that the MAC complete a Federal Aviation Administration (FAA) 150 Study five years before the airport is forecasted to reach 582,000 operations or the threshold for the current settlement agreement. We support a further recommendation that includes a cost estimate for mitigation. The cost estimate can be stated in the capital improvements cost section of the proposed five year update. We are disappointed that there is no agreement at this time regarding the noise threshold for mitigation. However, we and our fellow cities will continue to work with you and the MAC on this issue.

The airport's LTCP raises several issues that should be discussed and resolved soon. Among them are the consistency of the LTCP with other local comprehensive plans, the standard for noise levels, and the inadequacy of environmental review for setting growth standards for future land use policy. While we have come to understand that these issues will not be resolved through the council's actions today, we feel we need to put them on the record for future discussions.



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Overall, we understand that the Metropolitan Council is charged with the review of the LTCP for the MSP International Airport and its consistency with the council's Transportation Policy Plan (TPP). We recognize the hierarchy between these plans and understand that the 2030 Metropolitan Council System Plan is the overarching planning framework for planning in the metropolitan area. The TPP is an element of that framework and it follows that the LTCP needs to be consistent with both tiers of the regional planning framework in the same way that our local comprehensive plans must be consistent.

The 2009 Minnesota Statutes Section 473.175 calls for the review of comprehensive plans by the Metropolitan Council to ensure that these plans are consistent with the regional planning framework, consistent with legal requirements for comprehensive planning, and compatible with the planning and development called for in comprehensive plans for neighboring jurisdictions.

If the airport LTCP is approved by the council, the plan needs to be consistent with the TPP just as our comprehensive plan is consistent with the TPP and the Regional Systems Statements. It follows that a requirement for this same level of consistency be applied to the MAC and the MSP International Airport. The statutory foundation for this consistency, conformance and compatibility is at the heart of the Metropolitan Planning Act.

We believe that the council has not only a legal obligation to ensure consistency with the hierarchy of plans but also a practical obligation to ensure that the local plans are consistent with each other and that communities whose local land use plans have been approved by the Met Council have some assurance that other land use plans, including the airport LTCP, will not be approved until the council views them to be consistent and compatible.

We believe that council's 2009 TPP clearly provides for the council to direct the MAC to amend their plans. At page L-2 in Appendix L, it states, "Airport noise programs, and the application of land use compatibility guidelines for aircraft noise, are developed within the context of both local community comprehensive plans, and individual airport long term comprehensive plans (LTCPs). Both the airport and community plans should be structured around an overall scheme of preventive and corrective measures."

From the TPP, policy further states in Policy 25: Airports and Land Use Compatibility that

"In areas around an airport, or other system facilities, land uses should be compatible with the function of the airport. The planning, development and operation of the region's aviation facilities must be conducted to minimize impacts upon the cultural and natural environment, regional systems and airport communities."

Much discussion has also centered on whether or not the region (or MSP specifically) has an airport noise threshold of 60 DNL or is relegated to FAA's standard of 65 DNL as a significant noise threshold. There have been questions raised as to who can set a standard. FAA has determined that this authority rests with the local communities. From FAA's Part 150 Advisory Circular AC 150/5020-1: The responsibility for determining the acceptable and permissible land uses remains with the local authorities. FAA determinations under Part 150 are not intended to substitute federally determined land uses for those determined to be appropriate by local authorities in response to locally determined needs and values in achieving noise compatible land uses.

We concur with the MAC and council staff that the Consent Decree, in and of itself, does not create a standard of 60 DNL for airport noise within the environs of MSP under MERA. We feel very strongly that a standard has been set by cumulative actions of the

legislature, advisory bodies, the MAC and the council over a period of years long before the Consent Decree. While the MAC's current argument is that there is no standard other than the FAA's 65 DNL noise threshold, their past actions indicate otherwise. This is not a new standard but one that has been in place at MSP for over a decade (see Attachment A).

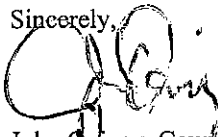
Questions have also been raised concerning noise mitigation and whether or not the mitigation should be addressed at all within the comprehensive plan or more appropriately addressed during environmental reviews. We believe that planning guidance encourages that noise impacts and alternative measures should be addressed directly within the LTCP and not just through individual environmental studies (see Attachment B).

Environmental reviews are triggered by project specific actions and thus tend to mask the cumulative impacts of development. As an example, the last Environmental Assessment prepared for the MSP 2015 Terminal Expansion project (similar to the current plan), a comparison was done for a "no build" alternative and the expanded terminal plan. Both scenarios used the same operational levels and the result was nearly identical noise footprints. It was concluded, since there was little change in the noise footprint under either scenario, that there was no significant noise impact attributed to the project. The real change however, was that the increase in numbers of operations projected an increase from 2007 with 14,671 dwelling units being exposed to 60+DNL levels (Table 6.3, Part 150 Study) to 21,986 dwelling units being exposed to 60 DNL or greater by 2015. That estimated 50 percent increase in number of units exposed was simply not addressed in the environmental assessment for any type of mitigation.

Again, we are grateful to the Metropolitan Council staff and members for their engagement in this dialog on these issues and appreciate that some modification was made to the proposed action items before the council. However, we believe that there is still much clarification needed on these issues.

If there are additional policy discussions that need to take place, the City of Minneapolis would very much look forward to being a part of those discussions. Again we thank you for taking the concerns of our communities under consideration in your deliberations.

Sincerely,



John Quincy, Council Member
11th Ward
City of Minneapolis

Attachment A

Six years prior to the Consent Decree, MAC's Part 150 submittal states:

"For this Part 150, DNL's equal to and greater than 60 dB were used for assessing community noise impact. This Part 150 Update considers a standard of 60 dB for eligibility for the MAC Sound Insulation Program for the following reasons:

The 1996 MSP Noise Mitigation Committee recommended that sound insulation should be provided to residents within the 60dB DNL contour.

Minnesota legislation dealing with the Dual Track Planning Process Environmental Impact Statement required MAC to make a recommendation to the State Advisory Council on Metropolitan Airport Planning. The legislation stated that "the recommendation shall examine mitigation measures to the 60 Ldn level." Therefore, the State of Minnesota Advisory Council on Metropolitan Airport Planning, pursuant to the Legislature's direction to review the recommendation and comment to the Legislature, reviewed the recommendation and concurred with the Commission's recommendation.

MC Land Use Policy guidance indicates that residential land use within the 60 dB DNL contour is inconsistent without sound attenuation."

An updated Part 150 submitted in 2004 makes a similar argument.

Attachment B

FAA planning guidance documents encourage early incorporation of environmental effects in planning documents:

FAA's Airport Environmental Handbook- *"When a master planning study is done, the sponsor is encouraged to incorporate airport noise compatibility planning and other environmental planning techniques in the study as a basis for subsequent environmental assessment."* (FAA Order 5054.)

FAA Advisory Circular 150/5070-6B, Airport Master Plans

"CEQ regulations require agencies to identify environmental effects and values in adequate detail so they can be compared to economic and technical analysis. Agencies must study, develop and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources. To permit these, environmental analysis must be integrated early in planning along with other planning analysis."

MC has incorporated similar language into their TPP which within this planning time frame will require airport operators to address noise compatibility planning within their LTCP submittals. At Appendix L, *"Airport owner submits long-term comprehensive airport plan or plan update (LTCP), including noise mitigation program for Council review and approval."*