

# METROPOLITAN AIRPORTS COMMISSION



Minneapolis-Saint Paul International Airport

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January 11, 2006

Mr. Jon Larsen  
Minnesota Environmental Quality Board  
300 Centennial Office Building  
658 Cedar Street  
St. Paul, MN 55155

RE: ZERO EXPANSION/TALKTRANS COMMENTS ON THE FLYING CLOUD AIRPORT  
(FCM) FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS)

Dear Mr. Larsen,

On January 4, 2006 Ms. Vicki Pellar Price representing Talktrans and Mr. Mark Michelson representing Zero Expansion (hereafter referred to as Zero Exp./Talktrans) sent an e-mail to the Metropolitan Airports Commission (MAC) and the members of the Minnesota Environmental Quality Board (MEQB) challenging the adequacy of the Flying Cloud Airport (FCM) Final Environmental Impact Statement (FEIS).

Zero Exp./Talktrans contend that the FEIS does not address two issues; (1) the Federal Aviation Administration's (FAA) redesign of the Class B Airspace around Minneapolis/St. Paul International Airport (MSP)<sup>1</sup> and (2) FAA's policy on pavement-based weight restrictions. Zero Exp./Talktrans argue that the MEQB should disapprove the FEIS based on its failure to adequately evaluate the environmental impacts of these two issues.

Considering existing FCM operational trends in and around MSP airspace, current MSP operational trends over the City of Eden Prairie (post Runway 17/35 opening – October 2005), and the realities of the Class B Airspace redesign, the Zero Exp./Talktrans environmental impact arguments based on the MSP Class B Airspace redesign are not valid. Additionally, given FAA's involvement with the development of, and amenable position regarding the 60,000 lb. runway weight bearing capacity provision throughout the FCM FEIS development process, subsequent FAA policy on runway weight limits should not impact the previously established 60,000 lb. jet weight limit at FCM.

The following provides further detail supporting the above underlined conclusions.

## **FAA's MSP Class B Airspace Redesign**

For decades the extent of the Class B Airspace around MSP has extended to 20 nautical miles (nm) around the airport. The un-shaded area on **Attachment 1** depicts the existing Class B Airspace around MSP.

The following dimensions detail the existing Class B Airspace around MSP as depicted in the un-shaded area on Attachment 1:

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<sup>1</sup> The new MSP Class B Airspace will become effective in February 2006.

- Area A – extends horizontally from the airport out to six nm, and extends vertically from the ground to 8,000 feet Mean Sea Level (MSL).
- Area B – extends horizontally from 6 nm to 8.5 nm, and extends vertically from 2,300 feet MSL to 8,000 feet MSL.
- Area C – extends horizontally from 8.5 nm to 12 nm, and extends vertically from 3,000 feet MSL to 8,000 feet MSL.
- Area D – extends horizontally from 12 nm to 20 nm, and extends vertically from 4,000 feet MSL to 8,000 feet MSL.

FCM is located approximately 11 miles to the southwest of MSP. As such, FCM is located approximately one mile within the outer edge of Area C and is located approximately 9 miles from the outer extent of the existing MSP Class B Airspace represented by the outer edge of the un-shaded area on Attachment 1. Approximately two-thirds of the City of Eden Prairie is located in Area C, including FCM, with the remaining third of the city located well within Area D. The existing MSP Class B Airspace over FCM begins at 3,000 feet MSL and extends upward to 8,000 feet MSL.

For the past four years the FAA has been in the process of coordinating a change to the Class B Airspace architecture around MSP. The two fundamental catalysts for the airspace redesign around MSP are, (1) to ensure adequate traffic management capabilities effectively accommodating traffic on the new Runway 17/35 at MSP and increases in overall traffic to and from the airport, and (2) to ensure optimization of the terminal airspace around MSP reducing delays and contributing to the overall National Airspace System (NAS) capacity.

The Class B Airspace modification proposal has been published for public comment on more than three occasions in the past four years including two notices in the Federal Register within the past two years. In summary, the new Class B Airspace extends the airspace around MSP to 30 nm almost all the way around MSP and expands the ceiling of the airspace from 8,000 feet MSL to 10,000 feet MSL. There are two areas where the airspace does not fully extend to 30 nm. One area is located north of MSP, where the extent of the airspace remains at 20 nm, and the other area is located to the southeast of MSP where the extent of the airspace is at 25 nm. **Attachment 1** depicts the modifications to the Class B Airspace around MSP in gray. The changes will become effective in February 2006.

The following points detail the changes in the Class B Airspace around MSP as depicted on Attachment 1 in gray:

- The ceiling of the Class B Airspace is raised from 8,000 feet MSL to 10,000 feet MSL in all areas
- Area D is extended to 30 nm to the northwest and southeast of MSP off the ends of the parallel runways.
- Area E sections are added to the southeast, northwest, northeast and southwest, extending in most cases horizontally from 20 nm to 30 nm and vertically from 7,000 feet MSL to 10,000 feet MSL. However, in the case of the small section of Area E to the southeast of MSP the horizontal extent is from 20 nm to 25 nm this is due to an accommodation for glider plane operations at the Stanton Airport. Additionally, the cut out in Area E to the north of MSP was done to accommodate glider plane operations at the Benson Airport.
- Area F is added to the south of MSP extending horizontally from 20 nm to 30 nm and vertically from 6,000 feet MSL to 10,000 feet MSL.

Specifically, the above modifications provide the following:

- Enhanced positive control of air traffic entering and departing the terminal area airspace around MSP for the purpose of landing or departing the airport while ensuring adequate aircraft separation with those aircraft that are not operating in and out of MSP.
- An airspace design that is consistent with present parallel runway aircraft arrival operations to the northwest and southeast of MSP and adequately accommodates arrival operations from the south of MSP to the new Runway 35.

It is important to note that the Class B Airspace redesign is simply modifying the existing airspace to better conform to existing operational patterns, not modifying existing operational patterns to conform to a new airspace structure. The Class B Airspace changes do not require jets to fly in different locations from where they operate today. It merely encompasses their current flight patterns and procedures in more tightly FAA-controlled airspace to enhance safety by separation of aircraft.

As detailed above, there will be no changes to the Class B airspace within 20 miles of MSP with the exception of the additional 2,000 feet on top of the Class B Airspace. As such, the only change over the City of Eden Prairie and FCM is an increase in the airspace ceiling from 8,000 feet MSL to 10,000 feet MSL. As detailed below, this will have no effect on the City of Eden Prairie.

In analyzing available FAA radar flight track data for FCM in the Fourth Quarter 2005, all of the aircraft that departed FCM and transitioned the Class B Airspace in close proximity to MSP were at an average altitude of 3,888 feet MSL. This means the aircraft were in contact and coordinated with FAA Approach Control and operating within the Class B Airspace. Moreover, there were no FCM operations that flew in close proximity to MSP outside the Class B Airspace above 8,000 feet MSL. As such, in the Fourth Quarter 2005 there were no FCM aircraft that were climbing to 8,000 feet or greater to transition over MSP for the purpose of avoiding contact with Approach Control. The data also suggests that FCM aircraft wishing to transition the MSP Class B Airspace without contacting Approach Control are flying around the airspace below the designated Class B floor. This has been a longstanding practice and is not something that will be exacerbated by the MSP Class B Airspace redesign.

In the context of MSP operations and the existing Class B Airspace, in comparing November and December 2005 (post Runway 17/35 opening) to November and December 2004, MSP operations over the City of Eden Prairie have reduced by 5.9%. The average daily number of MSP arrival and departure operations over the City of Eden Prairie in November through December 2004 was approximately 266, decreasing to approximately 250 in November through December 2005.

In summary, considering the above, the data does not support the assertion by Zero Exp./Talktrans that aircraft operating in and out of FCM, or in the vicinity of Eden Prairie today, will be forced to lower altitudes or rerouted following the implementation of the new Class B Airspace in February 2006. Moreover, in terms of MSP operations, the MSP Class B Airspace modification is not expected to negatively impact the City of Eden Prairie. These conclusions are consistent with the FAA's Categorical Exclusion Declaration on January 24,

2003, which was prepared for the MSP Class B Airspace redesign in accordance with FAA Order 1050.1 – *Policies and Procedures for Considering Environmental Impacts*.

**FAA Policy on Aircraft Weight Limits Based on Runway Weight Bearing Capacity**

In 1978 the MAC adopted Ordinance No. 51 limiting jet aircraft use of FCM to aircraft of 20,000 lbs. or less maximum takeoff weight, except in cases of emergency and/or those operations required by Federal or state law.

During the FCM EIS process discussion ensued regarding Ordinance 51 in the context of FAA's concern with providing reasonable access to the airport, the noise characteristics of newer, larger aircraft and allowing tenants to benefit from the extended runway in a manner that does not change the overall characteristic of the airport or poses significant increased noise impacts on the surrounding community.

The FCM Airport Advisory Commission discussed the issues in detail, and the topic was subsequently discussed by the FCM EIS Noise Mitigation Committee ultimately resulting in a December 2002 agreement between the City of Eden Prairie and the MAC. The agreement details various commitments on behalf of the MAC and the City of Eden Prairie related to the expansion of FCM. The MAC requirements included the amendment of Ordinance No. 51, which occurred in January 2003 when MAC adopted Ordinance No. 97.

The Ordinance increases the jet weight limit at FCM to a maximum Gross Takeoff Weight of 60,000 lbs. The limit is based on the weight bearing capacity of the runways at FCM, which includes consideration of the pavement design and the load and frequency of operations that are placed on the pavement based on the existing and forecast fleetmix at FCM.

On July 1, 2003 the FAA published a notice of proposed rule making in the Federal Register dealing with weight based access restrictions at airports as a means of protecting airfield pavements. In short, the policy provides a formula framework that can be applied to allow an appropriate number of aircraft weighing greater than the published runway weight capacity to operate at an airport during a given period of time. Specific elements of the formula would require additional study on an airport-by-airport basis. To-date FAA has not finalized this policy.

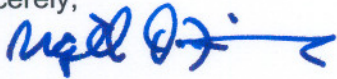
Throughout the development of the elements included in the FCM EIS, including Ordinance No. 97, MAC has worked with the FAA in the development of the aircraft weight provision. To date, MAC has received no formal FAA objection related to the weight limit that was imposed at FCM with the enactment of Ordinance No. 97 in January 2003.

Considering the above, there is no reason to conclude that the recent FAA policy, which was developed after the implementation of Ordinance No. 97, impacts the 60,000 lb. jet weight restriction at FCM. Regardless of future policy changes of the FAA the provisions of the FEIS will remain in effect.

I hope this information is helpful in EQB's review of the Zero Exp./Talktrans information. We believe that these issues have been addressed and should not affect the EQB's determination of adequacy. If you have further questions please feel free to contact me.



Sincerely,



Nigel D. Finney  
Deputy Executive Director  
Planning and Environment

cc:    MAC Commissioners  
      Ms. Vicki Pellar Price – Talktrans  
      Mr. Mark Michelson – Zero Expansion

# Attachment 1

