



# WEST LAKELAND TOWNSHIP

P.O. Box 447 Lake Elmo MN 55042

August 3, 2015

Mr. Neil Ralston  
Metropolitan Airports Commission  
6040 28<sup>th</sup> Avenue South  
Minneapolis MN 55450

RE: Lake Elmo 2035 Long Term Comprehensive Plan

Dear Mr. Ralston,

The town board of supervisors for West Lakeland Township opposes the expansion of the Lake Elmo Airport as outlined in your 2035 Long Term Comprehensive Plan for a number of reasons. The first of which will be the impact on our residents and their quality of life by the installation of the new proposed NW / SE 3,600 foot runway. Not only will this bring in larger aircraft, but more importantly move noise and operations into our existing residential neighborhoods of West Lakeland Township. While the new Runway Protection Zones will be entirely on MAC property, the MnDOT Safety Zones "A" and "B" will essentially overlay existing homes on 2 ½ acres and the overhead power lines which by current zoning is not allowed. In addition the proposed expansion is also in conflict with Washington County's and West Lakeland's airport overlay districts. If the intent is to modify current zoning to allow the proposed Lake Elmo expansion to occur, then the West Lakeland Township board would call your attention to MnDOT's Accident Distribution graphs depicting aircraft crashes within the proximity of an airport. By their own data, 60% of all arriving crashes happen within 6,000 feet of the end of the runway, while 60% of all departing crashes happen within 2,500 feet of the end of the runway. The township board cannot see how any safety zones protecting residents could be modified to accommodate an expansion of this kind.

In previous correspondence with MAC, West Lakeland Township was informed that the number of operations per year at Lake Elmo airport were reported to be 64,887 in 1995 and 70,687 in 2000. Using the 70,000 number for example, calculates out to one

operation every 8 minutes, 24 hours a day, 7 days a week, 365 days a year. In the 2035 LTCP ES-1 Table, MAC states for 2012 the number of operations to be 26,709 a year. Using this number that calculates out to one operation every 20 minutes. It would stand to reason that during the winter months, late November to April; the number of operations would be greatly reduced thus compressing the total operations into the summer months. In talking to a number of aircraft owners at Lake Elmo, all say these numbers are highly exaggerated, so the township board is requesting that MAC show us the data, how it was obtained and calculated. To go from 70,000 operations in 2000 to 26,000 operations in 2012, even with the down turn in the economy, seems suspect. According to MAC's own forecasts, Graph ES-2 predicts operations to stay flat or decrease out to 2035. Until MAC and the Met Council have accurate data on the number of operations per year at Lake Elmo Airport, the township board cannot see how it can be justified spending state and federal tax dollars for moving and extending the 14/32 runway along with the other proposed upgrades. According to MnDOT data five other airports in Minnesota have shorter runways than Lake Elmo. In discussing the runway lengths with some of the Lake Elmo aircraft owners, they also say that the 2849 foot runway is adequate for their aircraft, including twin engine aircraft based there.

Of further concern to the town board is the proposed realignment of 30<sup>th</sup> Street. The proposed route skirts a designated wetland which in 2013 and 2014 was prone to flooding after a number of heavy spring rains, as documented by the attached photos. These two years were wet years, so what would happen during a 50 or 100 year flood? Also adding an additional 270,000 square feet of impervious surface would further impact this wetland area. According to our township land planner / surveyor, constructing a road in this area, would be costly as this area has a very poor soil base. Realignment 30<sup>th</sup> Street would severely impact traffic flow because this street has been designated by Washington County as a minor east-west collector road, and is a Baytown - West Lakeland Township corridor with an average daily traffic count of 2500 vehicles a day. The township board believes an Environmental Impact Statement is warranted to analyze such impacts to this area before the proposed Lake Elmo expansion is undertaken. Furthermore if MAC moves forward with the proposed expansion and realignment of 30<sup>th</sup> Street and since this new route would be entirely on MAC property, West Lakeland Township would not be responsible for maintaining 30<sup>th</sup> Street from Manning Avenue to Neal Avenue. Also it appears that the 2035 LTCP fails to identify any funding or monetary assurances to address the potential and consequential deterioration of the western portion of 30th Street. This would be due to any construction and rerouting of the eastern proposed section of 30th Street and for the wear and tear on 30th for the heavy equipment brought in for the construction of the newly proposed runway. Since 30th Street is a shared road, both West Lakeland and

Baytown Townships would require monetary assurances from MAC that any detrimental effects to 30th Street, as result of the construction activity related to the airport and the reconstruction of 30th Street, will require MAC to bring the remaining western section of 30th Street towards Manning Avenue back up to township road standards which includes a 25-year warranty on the road.



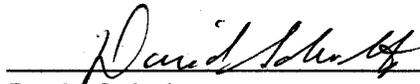
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Daniel Kylo  
Chairman – West Lakeland Township



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Steveh Ebner  
Supervisor – West Lakeland Township



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David Schultz  
Supervisor – West Lakeland Township

cc: Carrie Seifert – Clerk West Lakeland Township  
Ryan Gaug – MnDOT Aviation and Finance Director  
John Hanson – Valley Branch Watershed  
Senator Karin Housley – Minnesota Senate  
Commissioner Gary Kriesel – Washington County Commissioner  
Representative Kathy Lohmer – Minnesota House of Representatives  
Michael Madigan – MAC District F Commissioner  
Wayne Sandberg – Washington County Engineer