

February 8, 2013

Ms. Kandice Krull
Environmental Protection Specialist
Federal Aviation Administration Airports District Office
6020 28th Avenue South, Rm 102
Minneapolis, MN 55450-2706

Dear Ms. Krull,

Thank you for the opportunity to comment on the draft Finding of No Significant Impact - Record of Decision (FONSI-ROD) for the Minneapolis-St. Paul International Airport 2020 Improvements Environmental Assessment. The City of Minneapolis submitted comments on the draft Environmental Assessment in a letter to the Metropolitan Airports Commission dated October 5, 2012. Following is a summary of the City's comments:

- The provision of any new noise mitigation should be based on an assessment of measured conditions by geography rather than the total number of operations at the airport, and annual measurements should be tied to a clearly-defined mitigation strategy that is approved by the surrounding communities.
- The MAC should fund an independent noise study, which will aid in developing a more effective metric for making policy decisions about the future of the airport.
- The MAC should take on a leadership role with the communities and the FAA on identifying and implementing a new methodology and metric for measuring the impact of aviation noise.
- The FAA, MAC, and airlines should take steps to improve the use of preferred runways under the RUS and reduce time that runways are not able to be used for departures due to volume of flights.
- The MAC should join us in advocating for a statewide aviation strategy that results in more commercial airline service at airports with unused capacity.
- The environmental review of PBN procedures should be conducted in a timely manner, and include a geographic area large enough to fully understand whether and how noise will shift from one area to another.
- An Environmental Impact Statement should be conducted taking into account the cumulative effects of future airport actions including a full build-out of the Long-Term Comprehensive Plan and the implementation of Performance-based Navigation (PBN) procedures.
- The MAC should conduct additional air pollution modeling as well as a cumulative health risk impact study.

Noise Mitigation

The City of Minneapolis requested that the provision of new noise mitigation be based on an ongoing assessment of measured conditions by geography rather than a long-term forecast, as was proposed in the draft EA. The MAC responded to the City's request by modifying the noise mitigation proposal in the final EA. The MAC now plans to provide new or additional noise mitigation to homes located in the actual 60+ DNL noise contour, within a higher noise impact mitigation area when compared to its status relative to the Consent Decree noise mitigation program, for a total of three consecutive years, with the first of the three years beginning no later than 2020.

The City of Minneapolis appreciates the MAC's response to our concern and supports a mitigation program that uses annual noise measurements rather than a static forecast.

The draft FONSI-ROD indicates that the FAA's finding of no significant impact is not contingent on a commitment from MAC for additional noise mitigation. Further, it states that "The FAA is reviewing MAC's proposal for noise mitigation of homes for consistency with the 1999 FAA Policy and Procedures concerning the use of airport revenue and other applicable policy guidance." As the FAA conducts this review, please be aware that exterior noise of 60 DNL is the local standard for noise mitigation at MSP. The FAA has allowed the MAC to use airport revenue for noise mitigation to the 60 DNL line for several years. The Metropolitan Council has formally adopted 60 DNL as the local standard, as have all of the cities within the 60 DNL. All of these cities, including Minneapolis, have adopted ordinances requiring new residential construction and additions to include noise attenuation within the 60 DNL. In our view, the Minnesota Environmental Rights Act is violated whenever the MAC, a Minnesota unit of government, fails to provide noise mitigation for existing homes that are newly within the 60 DNL for exterior noise.

Further Study

We understand that the FAA requires use of the Integrated Noise Model with DNL as the primary metric for evaluating noise pollution, and that environmental review needs to be conducted using standards that are applied nationwide. However, MSP has been a national leader on noise issues in part because of its status as a hub airport on a relatively small footprint in a densely populated area. For this reason, The City of Minneapolis requested that the MAC fund an independent noise study in an effort to begin developing a more effective metric for making policy decisions about the future of the airport. Neither the final EA nor the responses provided by the MAC directly responded to this request. The MAC also did not respond to our request for a cumulative health risk impact study. The final EA is inadequate until we receive responses to these requests.

Finding of No Significant Impact

The City of Minneapolis will continue to reaffirm our request for an Environmental Impact Statement that includes the cumulative effects of future airport actions including a full build-out of the Long-Term Comprehensive Plan (LTCP). We disagree with the MAC's response that the later phases of the LTCP are not "reasonable foreseeable actions." The MAC has stated that it is positioning itself to be ready to build new facilities when additional carriers decide to locate at MSP. Just as the airport needs to be ready to build these projects in a reasonable amount of time, the surrounding communities need to understand the full environmental impacts of a possible build-out of the Long-Term Comprehensive Plan in order to make informed decisions about the long-term future of the airport.

Thank you again for the opportunity to comment. We look forward to your response.

Sincerely,

R.T. Rybak, Mayor
City of Minneapolis

Sandra Colvin Roy
Transportation and Public Works Committee Chair