

Summary of Comments and Responses



COMMENT: The reference to NPIAS airports on [page 11](#) is incorrect. It says [Figure 1-4](#) but should actually be to [Figure 1-5](#).

RESPONSE: The reference on [page 11](#) has been corrected to say [Figure 1-5](#).

SOURCE: Jayme Trusty, Executive Director, Southwest Regional Development Commission

COMMENT: The Hospitals with Heliports map on [page 101](#) ([Figure 6-7](#)) may not be accurate. Hospitals with landing areas for helicopters such as Marshall and Slayton are not identified on the map.

RESPONSE: The omission is noted and more precise source data for [Figure 6-7](#) is referenced. It is also important to note that all airports can serve helicopters even though they do not all have helipads specifically marked.

SOURCE: Jayme Trusty, Executive Director, Southwest Regional Development Commission

COMMENT: There exists a discrepancy in the catchment areas identified in the commercial air service map on [page 132](#) ([Figure 6-18](#)) and the cargo service map on [page 149](#) ([Figure 6-24](#)). The commercial air service map includes Joe Foss Field in Sioux Falls, which extends into the southwest region, while the cargo service map does not appear to include this out-of-state airport.

RESPONSE: The cargo map analysis was limited to Minnesota airports due to limitations on data availability, though border airports were originally intended to be included in the inventory survey. It can be reasonably assumed that out-state commercial air service airports do at a minimum handle “belly cargo” and so the catchments areas for [Figure 6-24](#) have been updated to indicate as such.

SOURCE: Jayme Trusty, Executive Director, Southwest Regional Development Commission

COMMENT: Only 10 percent of airports statewide meet the planning documents performance measure ([page 140](#)).

RESPONSE: The timeline targets included in that performance measures are aggressive but only a guideline. Ultimately each individual airport is responsible for initiating Master Plan and Airport Layout Plan updates. Clarifying text has been added on [page 141](#).

SOURCE: Jayme Trusty, Executive Director, Southwest Regional Development Commission

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COMMENT: The airport classification for the Grand Marais Municipal Airport should be Key rather than Intermediate.

RESPONSE: Airport classification assignment is based on existing infrastructure and the State Airport System Commissioner's Order, as approved by the Governor of Minnesota. Some system expansion is anticipated in the SASP over the next 20-years although the specific airports noted in [Table 5-4 \(page 80\)](#) are unlikely to be the exact airports being reclassified as Key. Additional language has been included ([page 80](#)) to address how an airport changes from one classification to another and clarifies that expansion will include expenses for the minimum system objectives ([Table 5-2](#)) of the new class.

SOURCE: John B. Barton, Chairman, Grand Marais / Cook County Airport Commission

COMMENT: The "Purpose" value in the project priority formula ([Figure 7-12, page 187](#)) fails to consider/include Public Safety in project scores. A Public Safety need for runway extension and widening should rank higher.

RESPONSE: Safety is first and foremost in this SASP's Goals ([page 19](#)). Although aviation focused, some strategies are beginning to look to a broader definition of Safety, including a Public Safety focus. The project ranking formula is presented in the SASP for transparency purposes however the plan does not set or alter the formula. A strategy has been developed ([page 23](#)) to periodically re-examine the formula. Projected revenues over the 20-year planning period are not sufficient to allow each airport with a public safety need to be 5,000 feet.

SOURCE: John B. Barton, Chairman, Grand Marais / Cook County Airport Commission

COMMENT: This plan should adopt the new FAA ASSET system categories and decouple runway length from classification status.

RESPONSE: MnDOT has made a commitment in the SASP ([page 11](#)) to evaluate the ASSET category of each airport. The current classification structure used in the state of Minnesota (i.e., Key, Intermediate, Landing Strip) is set by state statute and thus this plan does not have the authority to adjust the classifications. MnDOT will continue to work with the FAA to ensure Minnesota's airports are properly categorized.

SOURCE: John B. Barton, Chairman, Grand Marais / Cook County Airport Commission

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COMMENT: The existence of a 5,000 foot runway length as the determination between Key and Intermediate airport classifications results in identification of airport facility needs that in turn increase development costs for the airport.

RESPONSE: The minimum system objectives/facility requirements for long range planning are based on FAA Advisory Circulars and user requirements. The objectives were vetted by the advisory committees which oversaw plan development and progress. The minimum system objectives are established to ensure system airports are accessible and operate safely.

SOURCE: John B. Barton, Chairman, Grand Marais / Cook County Airport Commission

COMMENT: The SASP Key Airport density analysis ([Figure 6-26, page 157](#)) is subjective and misses the opportunity to identify the need for a Key Airport in Northeast Minnesota.

RESPONSE: New Key airports may be established with justification and a strong business case. The forecasts prepared for the SASP anticipate 5 new Key airports will be justified over the 20-year planning horizon. The description of the Key Airport density analysis has been edited ([page 156](#)) to acknowledge that gaps in Key Airport coverage do exist in remote areas of the state.

SOURCE: John B. Barton, Chairman, Grand Marais / Cook County Airport Commission

COMMENT: The regression analysis used to develop forecasts for future facility needs establishes a false sense of scientific reliability and does not allow for the impact of innovation or new or previously unrecognized variables that affect facility need.

RESPONSE: The SASP is prepared following FAA direction contained in various Advisory Circulars. Trend and regression analyses are two forecast methods that are accepted by the FAA. These methods have been applied at a system level, which is the scope of the SASP. Individual airport forecasts prepared through a master planning process will likely differ and be more precise compared to the SASP forecast. Moving forward SASP data will be updated using forecast developed in master plans which may accommodate new or unrecognized variables.

SOURCE: John B. Barton, Chairman, Grand Marais / Cook County Airport Commission

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COMMENT: The SASP planning process needs to include more interactive communication alternatives while it is being prepared so that airports may comment, justify, appeal projects and findings in the draft stage. A one month comment period is also inadequate.

RESPONSE: A public involvement plan was developed and was approved by the SASP Advisory Committee to guide stakeholder and public participation in SASP activities. The Minnesota Council of Airports represented many airports on the committee, and individual airports represented themselves as well. All activities of the advisory committee were posted to the project website. Outside of the SASP Advisory Committee opportunities for participation included: early listening post meetings conducted around the state prior to consultant selection, a technical advisory committee to advise the SAC, web pages of current activities as well as the afore noted committee meetings, Facebook and Twitter updates, outreach presentations as invited throughout the state, Capital Improvement Plan Fall Update meetings, among others. Comments were accepted throughout the planning process, the 30 day comment period is a requirement.

SOURCE: John B. Barton, Chairman, Grand Marais / Cook County Airport Commission

COMMENT: The SASP does not include analysis of available aviation work force or declining aviation education programs.

RESPONSE: A strategy in support of the Financial Opportunity and Responsibility goal ([page 21](#)) directs support to job creation in the state's aviation sector future work would be needed to conduct the desired analysis as it is outside the scope of the SASP. The SASP is an infrastructure based plan. Additionally, MnDOT Aeronautics programs not included in the SASP do exist to foster aviation education.

SOURCE: Jeff Johnson, St. Cloud; Rudwan Ghazal, St. Cloud

COMMENT: The SASP indicates that the Roseau Municipal Airport currently has adequate hangar space hangar space and no need for additional conventional hangar space in the near term planning period. In reality, however, Roseau's hangar space is inadequate for large itinerant aircrafts such as the King Air that might otherwise hangar there.

RESPONSE: The SASP examines the need for hangars for based and itinerant aircraft at the system level. Individual airport needs may vary from what is included in the plan. Furthermore, the financial needs for projects listed on 2012 CIPs were included in the investment plan. Projects first presented for inclusion in 2013 CIPs may not be identified in this SASP.

SOURCE: Todd Peterson, Roseau Municipal Airport

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COMMENT: The SASP sets forth a reasonable path to bringing the states publically funded airports up to a certain set of standards. The work that has gone into preparation of the plan is appreciated and it is hoped that the needs shown in the plan will result in state and federal funding to assist local governments with implementing projects identified.

RESPONSE: The show of support included in this comment is noted and appreciated.

SOURCE: Joel Dhein, City Administrator, City of Mora

COMMENT: The SASP does not include Certified Weather Observers as one of the methods of reporting weather across the state.

RESPONSE: The inventory conducted at the outset of the planning process was limited to infrastructure hardware and did not consider staffing at individual airports as that is beyond the scope of the plan. Text identifying the existence and skills of Certified Weather Observers has been added to the plan ([page 84](#))

SOURCE: Jeff Czczok, Brainerd Airport Commission