



DULUTH AIRPORT AUTHORITY

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August 11, 2010

City of Duluth
Duluth City Councilors
411 West First Street
Duluth, MN 55802

RE: Sky Harbor Airport Environmental Assessment

Dear Councilors:

On August 9, 2010, I received a copy of the attached letter to City Councilors dated June 15, 2010 from Ms. Christine Penney, Chair, Duluth Tree Commission. It is disturbing the Tree Commission failed to provide a copy of this correspondence to the Duluth Airport Authority (DAA) who has invested the local dollars required for the Federal Scoping Document and Environmental Assessment currently underway at the Sky Harbor Airport.

From day one, the DAA has been committed to a public process in order to reach a long-term resolution to this issue. The Federal Environmental Assessment (EA) process was undertaken to ensure all interested stakeholders have an opportunity to be involved. The EA process has included interested state, federal and local agencies through a Technical Advisory Committee (TAC) and local stakeholders in a Public Advisory Committee (PAC). Numerous meetings have been held over the last 24 months including visits to Tree Commission meetings.

Currently, as part of the EA, a separate tree study is being undertaken to address the concerns raised in the project scoping document. The tree study has involved Minnesota Department of Natural Resources Scientific and Natural Area personnel and forestry experts. It will determine ages and expected growth rates of the trees and respond to various issues raised throughout the environmental scoping process. The tree study will also develop a tree maintenance plan that can be implemented to prevent future impacts to the forest and airport under whatever consideration is determined as the long-term solution.

A number of questions remain about the tree study. First and foremost, will the Federal Aviation Administration (FAA) allow trees in the transitional area to remain based on the investment the DAA has made to install obstruction lights and protect these trees along the transitional surface? Secondly, Ms. Penney's table depicts all trees will be removed. This is not accurate and simply not the case. The tree study currently underway will further define the number of trees impacted and the distance of the penetrations of subject trees into airport approach surfaces. From there, the study is able to determine whether trees can be trimmed or will need to be removed. Her statement that tree topping is not a viable option for the white pine and that many will die appears to be made on misconceptions and generalizations. The Study nor the DAA has yet determined where and if trees will be topped or cut as part of any alternative, as the results of the tree study have not been finalized. When the tree study is complete, the DAA will continue to work with the technical team of forestry and ecology specialists to determine where and if tree impacts will occur and what the overall forest effects would be.

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While the scoping document identifies the cost to close the airport at \$2.7 million, that cost does not include lease buyouts, repayment of state grants, repayment of recent federal grants, and restoration of the site. The study will continue to compile this information. If the airport were closed, the City of Duluth would ultimately be responsible for 100% of closure costs. If one of the other alternatives is chosen, the FAA will fund 95% of the improvement costs.

The number of take offs and landings at the airport according to the FAA is roughly 13,000 per year which equates to 36 operations per day. As a result, airport usage is significantly more than 50 individuals per year as she makes reference to in her correspondence.

The airport has been in operation since 1939 and is a unique part of the City of Duluth's history. It is a United States Customs Point Of Entry and serves as a reliever airport conveniently located close to the Canal Park business district. The total annual economic impact of the airport equates to \$1.4 million and contributes to over 28 jobs.

I have openly stated all along I firmly believe the airport and surrounding environment can co-exist. However, it will require all stakeholders to include the DAA, FAA, MnDOT, DNR, Park Point Community Club, and Tree Commission's willingness to concede a little to reach a long-term resolution. This is a fair and equitable approach.

We are in the midst of a Federal Environmental Assessment that will be complete within the next 12 months. The cost of this process is over \$700,000 with the FAA contributing 95% of the funding and the DAA the remainder. Public participation and hearings will continue to be part of this process.

Recently, I've heard comments there is a movement to circumvent this process through City Council action. Any City Council action at this point regarding the environmental process would be grossly irresponsible given the investment made by the federal government and DAA to reach a viable long-term solution to this issue.

If you have questions or desire additional information, I am happy to provide a detailed update to the Council at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. D. Ryks", with a stylized flourish at the end.

Brian D. Ryks
Executive Director

Att:

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Cc: Mayor Don Ness
Congressman James L. Oberstar
Duluth Airport Authority Board of Directors
Duluth Aviation Institute
Mr. James Holmgren, President, Northland Constructors of Duluth
Mr. Jeno Paulucci
Mr. David Gaddie, President/CEO Republic Bank
Mr. Lee Anderson, Owner & Chairman, API Group
Mr. Russ Becker, CEO & President API Group
Mr. Sandy Hoff, Co-Owner, Lake Superior Helicopter
Mr. Don Monaco, Owner, Monaco Air Duluth
Mr. Alan Klapmeier, CEO Kestrel Aircraft Company
Mr. Bill King, VP Cirrus Design
Ms. Christine Penny, Duluth Tree Commission
Mr. Glen Orcutt, FAA Minneapolis Airports District Office
Mr. Dick Gould, President, Park Point Community Club
Northern Aviation Industries

City of Duluth
City Councilors

June 15, 2010

Dear Councilors;



The Duluth Tree Commission is involved in addressing the Sky Harbor Airport conflict with the Park Point pine forest. As you may know, the Federal Aviation Authority (FAA) has directed the airport to remove tree obstructions that have grown into the landing (or approach) glide path. The airport is in an interim agreement with the FAA to operate on a shortened runway, not operate at night and not use navigational aids. This interim agreement is valid until the obstruction issue is rectified. SEH Consulting was hired by the FAA and MNDOT, which regulates state airports, to conduct an impact study. SEH issued a scoping document in February, 2010 that outlined the issues and proposed 13 modifications to the airport configuration meant to minimize the airport's impact upon the pine forest. A further study, an Environmental Assessment (EA) will soon be issued, but that considers only 2 of the original alternatives.

With less than 2% of Minnesota's forests considered old growth, Duluth is fortunate that it can boast a forest of red and white pines, many of them over 200 years old, within the city limits, on a sand beach, on Lake Superior, making it a completely unique and valuable resource. It provides crucial resting, nesting, and feeding habitat for a host of migratory birds including rare and threatened species. What Hawk Ridge is for raptors, the Park Point pine forest is for hosts of songbirds. Of course, Park Point is one of Duluth's most popular recreational areas, enjoyed by hikers, skiers, beach-goers and birders from around the world.

The alternatives favored by the Tree Commission and other Park Point advocates did not move forward into the EA and the alternatives remaining are cause for great concern. Please refer to Table 1. for illustrations of the options. The two alternatives receiving further consideration in the EA are:

Alternative 12: shift the runway threshold (edge) away from the forest and build a runway extension into the bay between the airport and Park Point Recreation Area. The cost of this project is \$3,900,000. The impact (removal or topping trees) is a total of 193 trees. These trees represent the penetrations into the *approach* glide path airspace only. This is an important distinction as the runway *transitional* zones may prove to be an issue as well. We discuss that more in depth below.

Alternative 13: reconstruct the runway to shift slightly away from the forest to the southwest. The cost is \$5,620,000. The impact on the trees is removal of a total of 43 trees. Again, these are only those trees which protrude into the *approach* airspace specifically.

The *transitional* area adjacent to the approach area is a much greater area and has many tree penetrations. The intention within the scoping document for alternatives 12 and 13 is that only trees penetrating into the *approach* surface would need to be topped or removed. However the FAA may require removing tree penetrations within the transitional zone. If required, Alternative 12 requires 641 additional trees removed or topped. Alternative 13 requires 664 additional trees removed or topped. Clearly, if the FAA requires removal/topping in the transitional zone, the impact will destroy the Park Point pine forest.



Table 1. Sky Harbor Airport impacts on forest.

| | |
|--|-----|
| Alternative #12 Shorten Runway to 2,600 ft: Shift 300 ft. to the NW. Cost \$3,900,000 | |
| Approach area – total trees removed | 193 |
| Transitional area – total trees removed | 641 |
| Both approach and transitional area total trees removed | 834 |
| Alternative #13 Shorten Runway to 2,600 ft: Shift 300 ft. to the NW. Cost \$5,620,000 | |
| Approach area – total trees removed | 43 |
| Transitional area – total trees removed | 664 |
| Both approach and transitional area total trees removed | 707 |

The removal of any number of trees signals the loss of many more trees. As windbreak trees are removed, weaker trees succumb to wind and storms. As the forest is disturbed, insect pests thrive. Bark beetle is a presence in this stand of pines and could become a real threat if given an opportunity to get a foothold. **To be clear**, topping is not a viable option for white pine. While it *sounds* benign, many or most of those trees topped will die and those that survive will be unaesthetic.

A viable alternative that is not on the table by the airport authority and those working on the BA is no action in terms of any tree removal or topping. This results in the loss of the airport license granted by FAA and closure of the airport to any flights other than seaplanes. According to this document, closure of the airport may result in a cost of \$2,718,000 to the City of Duluth for return of airport grant monies and removal of facilities. Whether or not this is true is unknown but needs to be determined.

Although it is desirable to think of a scenario in which the airport and the pine forest can peacefully coexist, the truth is that the trees will continue to be an issue with the airport as long as they continue to grow. Our primary concern is the loss of many hundreds of old growth red and white pines in the event that transitional airspace cutting is required. We remain concerned about the on-going conflict of the airport with the forest. Trees will continue to grow into the airspace.

A real consideration is the number of people using the airport compared to the number of people using the forest and its paths. The feature that makes this airport unique is the ability to change from floats to wheels. All other aircraft can utilize the Duluth International Airport. We have been told that 50 planes per year utilize the switch-over feature. We would venture to say that probably 50 people A DAY utilize the pine forest.

We will keep you abreast of the situation as the BA is released. Councilor Sharla Gardner is on the Public Advisory Committee chaired by Scott Sannes of SBH and can provide additional information.

Sincerely,



Christine Penney
Chair, Tree Commission

