

CARE

Citizens Against Runway Expansion

We are a group of Kanabec County residents who would like to take advantage of the public comment period to voice a number of objections to the environmental reevaluation of the proposed Mora crosswind runway project. Both NEPA and MERA state that with potential destruction and impairment of our natural resources, not only purpose, but also need must be established. We believe this project falls far short of doing so.

1. SEH stated in a Kanabec County Times article last August (see enclosure) that 212 operations were expected on the new runway, short of the 500 needed for an FAA grant. Now just 10 months later that number has been inflated to 1000 April through November operations. The environmental reevaluation also states the annual operations at Mora are 15,000. Both these figures are in no way scientifically based. They are so overinflated they should be severely scrutinized as they are being used on a federal grant application.
2. There is no accident history to support the project. In fact, looking at the NTSB accident history (see enclosure) for Mora and nine surrounding airports for the past 25 years, the statistics are as follows; there have been twice as many accidents on turf runways (6) as have been caused by wind (3) and nine times as much injury and death. There has also been serious injury from a deer strike. Ironically, Mora's last accident was in 1999 on the old crosswind when a student pilot crashed in soft field conditions. With this being a turf runway, going through the middle of a woods and over and alongside wetlands, more danger than wind will exist here for pilots.
3. The environmental reevaluation mentions nothing of the FAA's own Advisory Circular 150/5200 33B which states any airport receiving federal grant in aid must keep new runway construction for piston aircraft 5000 feet from a wildlife hazard (see enclosure). This project is not even close to abiding by this advisory.
4. Eagle roosting is protectable under MERA guidelines. There exists an eagle nest, in Arthur Township, across HWY 65 from the project site. The eagles (4 at times) roost daily in the spring in trees which will be cut down for the project. These trees (one over 150 years old) are strategically located at the north end of the pond. The eagles frequently hunt from them (see pictures).
5. With the dangers of slick, icy, bumpy, and soft conditions which are often found on turf runways, we are concerned with the possible environmental effects. These effects could include an aircraft skidding off this runway into one of the two large wetlands which will be located adjacent to the designated runway area.
6. There has never been a mandate to build this runway (see enclosure). It is a terrible and dangerous site. The Field of Dreams Airport in Hinckley is only 17 miles away. It is blacktopped, lit, and open to the public 24/7. It is being used by the DNR, fire surveillance and other pilots. It is a certified crosswind runway

whose orientation is similar to St. Cloud's and Grand Rapids' airports. It has shuttle service to hotels, restaurants and the casino just a short distance away. No regional pilot would choose a daytime, summertime, turf strip here instead of Hinckley.

7. Wind coverage for airports is always listed as an average for the year and the 95% threshold below which a crosswind is recommended (not mandated) is also an annual figure. The latest wind study at Mora's airport shows the main having coverage at 97.22% for 13 knot wind and 94.77% for 10.5 knots. Both these figures are basically 95% or better (see enclosure). To segment the year to prove some sort of need for this runway is unacceptable. This past May there were a number of days with NE crosswinds. Are we to assume it would be realistic to say neither of these runways has over a 95% coverage during May so a third crosswind would be needed? This is all a waste of taxpayer's money!
8. Concerning the endangered butternut trees, the public was told in the 2004 EA they didn't exist (see enclosure). Now, suddenly, their existence has been acknowledged. However, the state has given permission to destroy them as canker is present in the community. This also is unacceptable. We wish to abide by the recommendation of Mike Ostry, butternut specialist for the US Forest Service. He states, "one criteria for selecting trees worthy of retention is that they are large enough (older) and growing near diseased and dying trees so that they at least have had the chance of being exposed to the disease and not just 'disease escapes' " (see enclosure). This community fits this description and we would like it preserved as long as possible. Who knows, a disease resistant tree may be found here.
9. The City, SEH, and the FAA have been informed of some interesting mounds on the site. At one time there was a Native American settlement on Spring Lake, a short distance to the south. Even though SHPO has stated no archeological significance exists on the site, we request an examination of the former Yankowiak property. None was done for the 2004 EA.
10. Wildlife abounds here. Bats are viewed nightly over the Yankowiak pond during the summer. However, the numbers are down. Along with the eagles, the project area is also home or frequented by geese, ducks, deer, crane, turkey, bear, bobcat, swans, heron, loon, hawk, and too many other small birds and animals to name (see enclosure). Again, the area is worthy of preserving for future generations to enjoy.
11. Mora Lake has experienced flooding three of the last six years. With the large amount of plant removal, grading, wetlands filled, and ditching to Spring Lake (connected to Mora Lake via a stream), we are concerned it would make spring flooding even worse.
12. The proposed runway will destroy a large prime agricultural field which has been in production for decades (see enclosed picture). NEPA states that such property should be given special regard. It has been estimated that by 2050 the world's agricultural land will have to produce twice as much or double in size. We wish to see this land protected. It is productive and contributes to the area's economy.

To sum up, we represent a vast majority who oppose this project. If you doubt it, do a survey. Please consider all these points and have regard for these public comments and our tax dollars. The project is not needed. The US private pilot population was 357,000 in 1980. It is now down to less than 188,000 (see enclosure, St. Paul Pioneer Press June 6, 2015). This land has much more value to our community as something other than a turf runway!

In May of 2015, the city of Mora sent letters to Congressman Nolan and Senator Klobachar asking for help out with some of the financial obligations to the FAA if the project were abandoned. In July, 2015, they voted to postpone the project due to lack of need and a loss of interest. Only when the FAA said they would withhold Yankowiak property grant money (see enclosure) did the City vote last September to again go forward with the project. **THIS DOES NOT QUALIFY THIS PROJECT AS A NEED.** The FAA is sponsoring and promoting this project and has done its own environment reevaluation. We feel this is a conflict of interest. We respectfully request that a neutral third party (agreeable to both sides) be the reviewer of the public's comments. This would be both fair and objective. Environmental law requires that our government set the highest of standards in protecting our natural resources. We only ask that you adhere to these standards of protection. Thank You.