



PO Box 19036, Minneapolis, MN 55419

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The thrust of SMAAC's comments were:

Airport flight capacity increases are not necessarily increases in passenger capacity and, at a hub airport like MSP, passenger capacity is shared between local and connecting passengers.

Local economic growth was said to be the critical planning factor for MSP Expansion in 1996 law and in the 1998 Record of Decision. Several factors were given as the basis for determining how many annual operations would be needed for 2020 projected economic growth: airline use and aircraft; schedules concentrated at certain hub hours, air traffic control system safe capacity for both VFR and IFR, weather histories, and the ratio of local boardings at MSP to connecting boardings.

Economic need, we have seen, is not market demand *because high local fares influence too many economic decisions*. And economic need is also *not the same as local passenger seat supply, except by accident*.

The actual annual number of local departures is *not a measure of need or demand* because the supply of fairly priced tickets here is determined by national competition or airline collaborations.

Under the conditions as they are today at MSP, the useful local passenger capacity for MSP in 2020 and 2030 is not specified and *is not even a fixed proportion of the projected annual flight use*.

MSP annual flight use is based in the LTCP on a range of factors either dictated by airlines or based on MAC plans for airport businesses rather than general metropolitan economic growth.

Worse, the LTCP assumes more operations per peak hour than is warranted in the next 8 years by safety. Had per runway rates of 50 operations per hour been considered safe in 1998, the 2020 "need" for 33 million passengers and 620,000 operations would not have required a new runway or MSP expansion.

Transportation policy planning should be determined here, not in Atlanta or Washington. The MSP LTCP needs to be re-focused on operations meeting economic growth and population increases. And the public interest in safe, green, and healthy operations should be given far more consideration.