

Stuart Anderson P.E. Division Director
Transportation Development Division
Iowa Department of Transportation
800 Lincoln Way
Ames, Iowa 50010

RE: 80/20 Annexation Petition

Dear Mr. Anderson,

Last year, the Mahaska Board of Supervisors was informed that the City of Oskaloosa has adopted a comprehensive development plan. While the plan proposes various transportation improvements that could benefit Mahaska County, the proposed South Central Regional Airport is not one of them. The Board and the people of Mahaska County have been steadfast in opposition to this project for nearly ten years including being involved in litigation that went to the Supreme Court. Over time, this project has continued to lose support from community partners including the main users of the proposed airport such as the Pella Corporation. We strongly believe in private property rights and have grave concerns that this annexation is merely a way to permit the City of Oskaloosa to use eminent domain powers to complete its land acquisition for the airport over the objection of local landowners. Moreover, the Board is concerned that 220th St will be closed or adversely impacted by the proposed development which is critical farm-to-market road in the local area.

Additionally, recent developments in how the South Central Regional Airport Agency (SCRAA) has operated give us grave concerns on how this project could move forward. SCRAA is a 28E entity currently composed of the City of Oskaloosa and the City of Pella. SCRAA owns part of the land necessary to build the airport but it has not operated with sufficient transparency in its operations. Pursuant to Iowa Code 23.8, the Iowa Public Information Board (IPIB) has accepted multiple complaints that SCRAA violated Iowa Code Chapter 21. SCRAA has made decisions behind closed doors to change how their farm ground is rented to avoid public bidding, transparency, and ultimately, public scrutiny. Since the City of Oskaloosa is a member of this 28E entity, we are concerned this lack of transparency will continue in the annexation process.

Not only is the airport project bad public policy, but the proposed annexation is legally questionable. The planned annexation would extend the city's corporate boundary along the IA-163 corridor including a swath of land approximately 475 feet wide and three and a half miles long currently controlled by the DOT. To be clear, the reason the City of Oskaloosa wants to annex this roadway is so that it can make a contiguous border with land owned by SCRAA and annex the entire airport site. We are not aware of any other location in the state where such a long and narrow strip of land has been annexed by a city to create a contiguous boundary in this way. Even if the city proceeds with a voluntary annexation (80/20) process to incorporate IA-163 and the airport site, such request must go before the City Development Board as part of the land falls within an urbanized area. Pursuant to Iowa Code section 368.17(4), the City Development Board cannot approve an annexation unless "the city will be able to provide to the territory substantial municipal services and benefits not previously enjoyed by such territory, and that the motive for annexation is not solely to increase revenues to the city." Since the DOT already maintains the roadway on IA-163 and the Iowa State Patrol and Mahaska County Sheriff's Office provide police protection, the Board fails to see what "substantial municipal services" the city can provide to this strip of land which is too narrow for any economic development and does not require water supply, sewage disposal, or additional fire and police protection.

We recognize and appreciate the significant investment being made by the Iowa DOT in our transportation infrastructure. While we support growth opportunities in our industrial, commercial, and residential sectors, the Board strongly believes the proposed South Central Regional Airport is not one of them. Therefore, we urge you not to consent to the annexation IA-163 by the City of Oskaloosa.

Sincerely,

Mark Groenendyk, Chair
Mahaska County
Board of Supervisors

Steve Wanders
Mahaska County
Board of Supervisors

Chuck Webb
Mahaska County
Board of Supervisors

Enclosures