

—TOWN OF—
MIDDLETON
Wisconsin

April 19, 2022

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Re: Town of Middleton Public Input for the 4/19/22 Common Council Meeting (in person only), Agenda Action Item, *in opposition to adoption of the new Morey Airport Layout Plan and City of Middleton Resolution 2022-25* Direction for Completing a Master Plan for (expansion of the Middleton Municipal Airport - Morey Field (“C29” or “Morey Airport” or “Airport”))

Dear Mayor Brar, Common Council President, Alders, and Alders-Elect:

It is unfortunate that the City of Middleton (“City”) provided insufficient notice to the towns of Middleton and Springfield that City Resolution 2022-25 would appear on the City Common Council’s 4/19/22 Agenda as an action item for approval. In addition, towns are having their statutory annual electors’ meeting tonight and the town chairs run these meetings and therefore are unable to also appear in person at the City of Middleton City Hall for the Common Council Meeting. This date conflict is especially problematic since the City eliminated its virtual zoom public comment option for tonight’s Common Council Meeting requiring in person only public input. Unfortunately, this meeting date conflict will dilute public participation and input at these important meetings tonight and force the public to choose which meeting to attend.

We hereby request that this correspondence, and the 2/1/22 letter from the Town of Middleton attached to this email, be included in the 4/19/22 City Common Council Meeting Minutes to record in the official record the Town of Middleton's opposition to adoption of the new Morey Airport Layout Plan for expansion and the City of Middleton's Resolution 2022-25 under "Public Comments" related to City Agenda Item "Resolutions, 5.) Resolution 2022-25 Adoption of Airport Master Plan Report and Airport Layout Plan (CC 02/01/22; Airport Cmsn 04/7/22; Ald. Burck)".

Summary of Town of Middleton Comments related to City Resolution 2022-25

The Airport Layout Plan ("ALP") and the proposed Morey Airport Master Plan Ch. 6, Implementation Plan, are incomplete and limited in that they do not address potentially egregious environmental impacts and costs, and the financial estimates/forecasts that are included are incomplete and are not comprehensive.

With respect to the draft ALP, many of the recommended modifications to the Morey Airport facility are contrary to FAA Advisory Circular ("AC") 150/5190-4. This AC clearly states that "an airport sponsor or airport owner that also holds local land use authority is expected to develop appropriate policy and procedures to secure land use compatibility within its jurisdiction. Airport sponsors that do not have the land use authority to regulate the land use within an adjoining jurisdiction should work cooperatively with that local land use authority to implement appropriate land use policy." It is incumbent upon local government, in this instance the City of Middleton, as both the Airport Sponsor and Land Use Authority to be responsible for any impacts that existing and proposed facility development would have on the adjacent municipalities.

The City of Middleton's project manager may not be a certified city or land use planner, but that individual should still understand and advise the airport proprietor that the impacts to adjacent noise sensitive land uses, environmental and surface transportation impacts based on this proposed plan do not conform to proper planning practices. The City should also fund a Transportation Study to determine the impacts of proposed changes to Schneider Road on roads in the towns of Middleton and Springfield. In addition, there is not even a mention of the subject and concern for the protection of prime agricultural farmland, which will be destroyed for Airport facility expansion. This is in stark contrast to the City of Middleton's Comprehensive Plan 2021 Land Use Strategy "to preserve farmland", including "prime farmland to the north".

Although the proposed Airport expansion in phases will require a subsequent National Environmental Policy Act ("NEPA") review, the City should insist that the comprehensive Airport expansion project be evaluated under a full federal NEPA Environmental Impact Statement ("EIS") process. This would be especially important and relevant since the proposed Airport expansion impacts a number of items that are foundational to a full EIS. Those items include: the effects on invaluable prime agricultural farmland, wetlands, flood plains, endangered and/or threatened species/critical habitat, disruptive aircraft noise, significant damaging environmental airborne emissions, including lead, and socioeconomic impacts. All of these areas should be carefully considered as they introduce "extraordinary conditions" to both the site and all surrounding areas.

Despite the fact that the City Council has seemingly ignored all public input on the Airport operations and expansion plans, it should not ignore three extremely relevant and specific citizen environmental responses in the City's own 2021 POLCO Airport Survey. The City's Survey respondents stated overwhelmingly it was important to avoid any negative impacts on

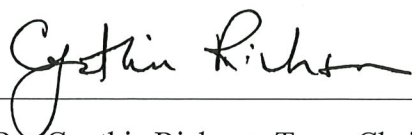
groundwater quality (92%), air quality (81%), and noise pollution levels (86%). The EIS process should be expected to require a minimum of 12-18 months and would likely cost in excess of \$1 million. The funding for such environmental studies is not reflected in the project costs in Ch. 6, Implementation Plan, Table 6-1.

Section 6.3.2 - Operating Expense Categories, along with supporting Table 6-3, are acutely lacking in content and analysis. The calculation of future costs associated with the operations of the facility only includes escalation factors for inflation. Missing is the practical, and very real, escalating operational costs associated with increased Airport infrastructure and forecasted operations. For example, the analysis fails to include the anticipated significant increased costs of insurance premiums. Enhancements and additions to the Airport facilities infrastructure would undoubtedly be accompanied by a meaningful increase in the cost of insurance premiums to cover the increased value/replacement cost of the changes. The additional cost of liability insurance coverage based on increased aircraft operations and fuel sales is also not accounted for in the expense analysis. Other expenses/costs (e.g., utilities, ground maintenance etc.) associated with increased Airport infrastructure (e.g., more lights, more pavement, more drainage, more landscaping etc.) are also completely absent. Debt service costs associated with the local match required for these expansion projects, in addition to the non-federally eligible costs related to hangar development, are also not accounted for and will have appreciable impacts to the Airport and/or the City's general fund and may even have consequences on the City's bond rating.

It should also be noted that most airport master plan implementation plan chapters detail potential funding options whether they be federal grants, local grant matching funds, bonds, loans, or other funding mechanisms. Such information is completely missing from the Ch. 6, Implementation Plan, considered here and therefore lacks comprehensiveness and completeness and is potentially misrepresentative in nature. The method and eligibility for specific funding can have a significant impact on the viability of expansion, development and implementation, the financial health of the facility, and of its sponsor. Ch. 6 makes no mention of which proposed projects could be funded through federal grants, which ones would rely on local funding, and the degree of indebtedness that the Airport Sponsor (City) may assume with each phase of project implementation. As part of this analysis, Ch. 6 should also make an attempt to quantify the impacts that the taking and conversion of private property for public use would have on the respective municipal tax base. Obviously there are a significant number of expense funding and cost variables, which should be considered even from a basic level of analysis, that are missing from the balance sheet in Ch. 6.

Sincerely,

Town of Middleton, Town Board



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