

**Town of Middleton Public Testimony related to the January 12, 2021, 7 pm,
City of Middleton Plan Commission Public Hearing on the
City of Middleton Draft 2020 Comprehensive Plan
Dated: 12/21/2020**

One abundantly clear lesson that has emerged from the ongoing COVID-19 public health pandemic is that our collective human health and wellbeing is all interconnected.

Under Wis. Stats. §66.1001, the Wisconsin Comprehensive Planning Law requires public participation at the local level in deciding a vision for the community's future. The uniqueness of individual comprehensive plans reflects community-specific and locally driven planning processes, and a local government may choose to include additional elements beyond the nine required elements of which Transportation is one of the required nine elements. Comprehensive plans are intended to provide a rational basis for land use and community decisions. It is also important that land use goals not conflict with goals from other elements.

As a municipality adjacent to the City of Middleton, the Town of Middleton is impacted by City land use and other planning decisions. We note that the City of Middleton provided written comments to the Town of Middleton during its 2019 Town of Middleton Comprehensive Plan Update, and other cities such as the City of Stevens Point welcome and encourage surrounding municipalities to participate in their City Comprehensive Plan update process. We hope that you welcome Town of Middleton input in the same positive, cooperative manner. See <https://stevenspoint.com/602/Comprehensive-Plan>.

Town of Middleton input is particularly important at this juncture due to the City of Middleton Draft 2020 Comprehensive Plan Update as the precursor to the pending City of Middleton, Middleton Municipal Airport – Morey Field (a/k/a “Morey Airport” or “C29” or “Airport”), Morey Airport Master Plan Project where proposals for significant Airport expansion are under current consideration. Existing Morey Airport operations are already negatively impacting the Town of Middleton and Town of Springfield.

The City of Middleton Draft 2020 Comprehensive Plan Update is available on its website at <https://www.cityofmiddleton.us/366/2020-Comprehensive-Plan-Update>.

We urge the City of Middleton to not approve the Draft 2020 Comprehensive Plan Update Transportation Element in its current form as it relates to the Middleton Municipal Airport-Morey Field (a/k/a “Morey Airport” or “C29” or “Airport”) unless and until substantial revisions have been made resulting from the City of Middleton engaging in meaningful dialog with material input from the Town of Middleton and the Town of Springfield due to the already existing, significant safety concerns and negative impacts on these municipalities from C29 operations and other recent City of Middleton actions. *Existing* incompatible land uses must be taken into consideration. A Third-Party Risk assessment study needs to be performed by the City as a high priority item to ensure the safety of families living in the vicinity of Morey Airport for *existing* airport operations, and *before* any additional development of Morey Airport is considered, approved or takes place.

On 12/15/1998, the City of Middleton Common Council made a commitment to “all City and area residents” and committed to “restricting the runway length to 4,000 feet”, to “not support the construction of a crosswind runway;” and “to urge pilots to follow flight patterns over commercial and industrial areas and away from residential areas”. Many City and area residents have relied on the City’s commitment. Now, in complete contradiction to this commitment, the City of Middleton is proposing in the Draft 2020 Comprehensive Plan to change Morey Airport from a recreational Airport to a commercial cargo and business Airport, which is wholly incompatible with *existing* noise sensitive residential and school land uses in the vicinity of Morey Airport, and will significantly *decrease the safety of those living and gathering in the vicinity of Morey Airport*. Changing Morey Airport from a recreational Airport into a commercial Airport via this Draft proposal is particularly disingenuous since the Dane County Regional Airport is only 9.9 miles from Morey Airport, which is where this type of commercial aviation traffic belongs, not in the middle of densely populated Middleton area residential neighborhoods.

We request that our preliminary input be taken into consideration, with particular emphasis on the Transportation Element, and related aspects in various other parts of the City’s Draft 2020 Comprehensive Plan (referred to as “City Document” below), as follows:

City Document, page 2, “Love Your Neighbor” mural painted on the side of a building in downtown Middleton; *page 5*, “The Good Neighbor City”; and *page 29*, “6. Continue to plan for and operate Middleton Municipal Airport – Morey Field in a manner that...supports regional economic development...and serves as an attractive and neighborly gateway to the surrounding community.:

Town Comments: As part of the “surrounding community”, we would like to know what exactly is meant by “serves as an attractive and neighborly gateway”? Is this merely a marketing attempt to gloss over the important issue of the safety of the surrounding community by focusing only on aesthetics without addressing the very important issue of the *existing* negative impacts of Morey Airport? Given the fact that Dane County Regional Airport is only 9.9 miles from Morey Airport, what exactly is meant by “Continue to plan for and operate Middleton Municipal Airport – Morey Field in a manner that...supports regional economic development”? According to the City of Middleton’s Airport consultant, Mead & Hunt, “Recreation is the most prominent use” at Morey Airport (See Mead & Hunt, Ch. 2 Aviation Demand Forecasts (July 2020), page 2-8; Available at: <https://www.cityofmiddleton.us/455/Airport-Master-Plan>; See also City of Middleton Draft 2020 Comprehensive Plan page 51, “Airport Use” graph, Source: Draft Airport Master Plan Figure 2.2.). To its credit, Dane County Regional Airport has engaged in extensive, early land use planning around the airport and has plenty of room for expansion. Dane County Regional Airport is the appropriate location for cargo and other commercial aircraft operations, and the City of Middleton should not be actively trying to solicit the transfer and relocation of such commercial operations to Morey Airport where a multitude of incompatible land use issues for current operations already exist.

In addition to these aspirational City of Middleton marketing slogans, the City of Middleton also markets Morey Airport as “The Good Neighbor Airport” (See <https://www.moreyairport.com/>).

Increasingly, City of Middleton actions are negatively impacting the quality of life and safety of residents in the Town of Middleton and the Town of Springfield. As adjacent municipalities that share a geographic boarder with the Town of Middleton located to the west of the City of Middleton and the Town of Springfield with prime farmland located to the north of the City of Middleton , we would welcome actions that are consistent with the City of Middleton’s marketing slogans.

Introduction (Issues and Opportunities)

City Document, page 4, “Community Values, As the Good Neighbor City, Middleton embraces...Community...Sustainability...future generations...Equity...fair and just..Health..well-being of people and the environment...”

Town Comments: We applaud these community values and hope the City applies these values not only to City residents, but also to area residents as well.

City Document, page 6, “The Plan...Element: Green City”.

Town Comments: Please modify the City’s Plan to also include an action item to mitigate in the short-term and eliminate in the medium-term the air, soil and water pollution from the exclusive sale of leaded aviation-gas and kerosene-based Jet A fuel at Morey Airport and related pollution emissions from Morey Airport airplanes (See also City Document page 11 re: short, medium, long-term Actions).

City Document, page, 11, “Gc4A. Create a bird friendly building ordinance that reduces bird collision mortality in all new developments.”

Town Comments: Please expand the City’s bird friendly policy to include Morey Airport and to also apply to repetitive low altitude airplane training operations and other low altitude Morey Airport airplane flight tracks, to reduce bird strike mortality and the risk of low altitude flying Morey Airport airplanes striking migratory and other birds. See Morey Airport airplane Flight Tracks Map submitted by the Town of Middleton to the City of Middleton on 10/30/2020 to C29masterplan@meadhunt.com.

City Document, page 13, “T1E. Promote active transportation solutions that enhance health and quality of life.”

Town Comments: Please also seek transportation solutions that enhance health and quality of life for those living in the vicinity of Morey Airport per the City of Middleton Common Council commitment by Resolution on 12/15/1998 to encourage pilots to follow flight patterns over commercial and industrial areas and away from residential areas; to restrict the runway to 4,000 feet; and to not support the construction of a crosswind runway. In order to reduce the risk of significant bodily harm (third party risk) to families living within 5 miles of Morey Airport where studies show airplane accidents are more likely to occur, and the increased risk to the occupants of the 10,000 vehicles per day, including school busses, driving up and down Airport Road, bicyclists, and area pedestrian sidewalk users, plus vicinity places of congregation (e.g., schools, indoor/outdoor Keva Sports Center, parks and playgrounds, inpatient Miramont 72-bed psychiatric hospital etc.), to increase Morey Airport pattern altitudes in order to fly at least 1,000 feet above congested areas to reduce third party risk to persons and property on the ground. With respect to reducing/eliminating high levels of mobile (air) lead pollution from leaded aviation gas from the piston-driven airplanes flying in and out of Morey Airport, Morey Airport should immediately begin to sell *unleaded* aviation gas at Morey Airport.

For information regarding the cumulative negative health impacts of lead exposure, see <https://www.dhs.wisconsin.gov/lead/health-effects.htm>.

For information documenting that 79% of the Morey Airport Runway 01 Runway Protection Zone (whose purpose is to protect people and property on the ground) actually goes over Airport Road to the south putting users of Airport Road at significantly greater risk of a Morey Airport airplane colliding with a vehicle during takeoff and landing, see the City of Middleton’s airport consultant report by Mead & Hunt, Morey Airport, Ch. 3. Facilities Requirements (Draft - October 22, 2020) available at <https://www.cityofmiddleton.us/455/Airport-Master-Plan>.

See also the 11/12/2020 Town of Middleton letter to the City of Middleton with the Town of Middleton’s airport consultant’s analysis regarding recommended safety improvements for people on the ground with respect to the Morey Airport Runway 01 Runway Protection Zone where 79% goes over Airport Road to the south available at <https://town.middleton.wi.us/airport>.

See also the 11/17/2020 Town of Middleton letter to the City of Middleton requesting that the City install Low Flying Airplane Hazard Warning Signs (W11-57) on Airport Road and Deming Way, adjacent to Morey Airport, to warn vehicle, bicycle and pedestrian users of the Morey Airport low flying airplanes hazard available at <https://town.middleton.wi.us/airport>.

See also “*Green Car Difficult to See: Pilot*” Capital Times article on 4/16/74 by Marvin Cook and Mike Miller, regarding an airplane being flown by a student pilot with an instructor attempting to land at the Waunakee Airport that hit a car driving on Division Street during busy weekday, daylight hours (6 pm), available at <https://newscomwc.newspapers.com>.

Land Use (Agriculture, Natural and Cultural Resources)

City Document, page 15, Land Use, Middleton will establish a land use pattern that promotes...protection of natural resources...in order to maintain an exceptional quality of life...that benefits the whole region."

Town Comments: First, we are requesting that the City retain an independent consultant to analyze and prepare a Compatible Land Use plan, in collaboration with the Town of Middleton and Town of Springfield, that takes into consideration, and reduces or eliminates, the negative impacts that Morey Airport is already having on the community due to *existing* loud, disruptive Morey Airplane overflights and address, in a genuine and meaningful manner, the daily, low altitude flying over residences and schools.

According to the Wisconsin Department of Transportation, Bureau of Aeronautics, most aviation accidents occur within five miles of an airport, and that more than 50 percent of accidents occur during takeoff and landing. Figure 2-3: Arrival Accidents, in the Wisconsin Department of Transportation, Bureau of Aeronautics, *Wisconsin Airport Land Use Guidebook (June 2011)*, shows the wide spatial distribution of arrival aviation accidents occurring within 25,000 feet, or approximately five miles, of the runway, citing its source as the California Airport Land Use Planning Handbook (January 2002).

According to the California Airport Land Use Planning Handbook (January 2002), of the 873 accidents studied, 23% of general aviation approach accidents take place in the landing pattern, at approximately double the rate of takeoff accidents, when on final approach, or during a go-around attempt. Many factors can contribute to an airplane approach accident, including poor visibility, and unexpected downdrafts. Flying at lower altitudes increases the risk of an unsuccessful recovery from unexpected conditions, and is cited by the FAA as one of the top ten reasons for general aviation accidents. It should also be noted that the updated California Airport Land Use Planning Handbook (October 2011), page xi, states, "Nothing substantial has changed with respect to where the highest number of aircraft accidents are occurring."

The California Airport Land Use Planning Handbook (January 2002), also states that runway length is another important consideration. Arrival accidents cover a larger area for longer runways, longer runways have more IFR accidents, and nighttime accidents occur more often on longer runways than shorter runways. Approximately 14% of general aviation accidents occurring in hours of darkness (one hour after sunset to one hour before sunrise). Darkness and poor weather both adversely affect the severity of aviation accidents. General aviation IFR accidents have serious or fatal results about half of the time whereas only a quarter of VFR accidents have such severe consequences. Protecting people and property on the ground from the potential consequences of airport vicinity accidents is a fundamental aspect of land use compatibility.

Second, we are requesting that the City retain an independent consultant to analyze and prepare, in collaboration with the Town of Middleton and the Town of Springfield, a Third-Party Risk analysis due to the *current* reduction in safety impacts for families on the ground in the vicinity of Morey Airport that continues to occur because of *existing* Morey Airport airplane operations.

We are also requesting that the City increase its wholly inadequate Minimum Standards for Commercial Aeronautical Activities at Morey Airport with respect to student pilot liability insurance, which currently provides for only a \$100,000 liability insurance limit.

Third, we are requesting that the City retain an independent consultant to conduct a comprehensive Environmental Assessment for Morey Airport, in collaboration with the Town of Middleton and the Town of Springfield, and that the City take immediate action to, reduce in the short-term, and eliminate in the medium-term, the significant volume of lead pollution produced from the current exclusive use of leaded aviation-gas and kerosene-based Jet A fuel at Morey Airport. In accord with the City's stated goal to reduce its greenhouse gas emissions, we are requesting that a *current* Morey Airport Aircraft Emissions Inventory be conducted for Hazardous Air Pollutants ("HAPs") and Greenhouse Gases and Atmospheric Dispersion Modeling. Such inventory and modeling should also include other sources of HAPSs associated with airports such as aircraft repair and maintenance facilities and any other airport support services at Morey Airport that generate air emissions. Finally, we are requesting that in preparation for the AMPAC Meeting to discuss Mead & Hunt Ch. 4 Alternatives, that each Morey Airport "Development Alternative" proposal also include disclosure of the differences in pollutant concentrations between the project alternatives (i.e., action vs. no-action). See Aviation Emissions and Air Quality Handbook, Version 3, Update 1, Federal Aviation Administration Office of Environment and Energy, January 2015, available at https://www.faa.gov/regulations_policies/policy_guidance/envir_policy/airquality_handbook/media/Air_Quality_Handbook_Appendices.pdf.

City Document, page 18, "Strategy 2...Actions: A...The City of Middleton collaborates with the surrounding towns to preserve their rural and agricultural character through intergovernmental agreements."

Town Comments: The Town of Middleton would welcome a collaborative approach from the City of Middleton, particularly with respect to the Town of Middleton's recent request for a comprehensive boundary agreement under Wis. Stats. §66.0307 with the City of Middleton.

City Document, page 20, "Strategy 4: Ensure that all land use decisions incorporation resiliency, equity, and adaptation."

Town Comments: Please also add "land use compatibility with existing uses", particularly as it relates to families living in densely populated residential areas in the vicinity of Morey Airport.

Transportation

City Document, page 28, “Transportation...Transportation is associated with other costs as well, for it accounts for 29% of greenhouse gas emissions in the U.S. (slightly more than electricity production).³”

Town Comments: Please add “and the associated health and other costs from leaded aviation-gas and kerosene-based Jet A fuel used by airplanes flying in and out of Morey Airport (See <https://www.dhs.wisconsin.gov/lead/health-effects.htm>).”

City Document, page 31, “E. Promote active transportation solutions that enhance health and quality of life... Vehicle exhaust causes air pollution that contributes to asthma and cancer, and emissions of greenhouse gases from vehicles are a major contributor to climate change... The City should participate in and promote educational campaigns that enhance public awareness of availability of transportation options and the impact travel choices have on household finances, personal quality of life, health, society and the environment.”

Town Comments: In 1996, leaded gasoline was banned by the Clean Air Act for use in new vehicles. However, piston-drive aircraft, like the ones flown in and out of Morey Airport, still use leaded aviation-gas. According to the Wisconsin Department of Natural Resources, 90% of lead emissions in Dane County are caused by leaded aviation gas used by piston-driven aircraft (2017: 0.323 tons) and unfortunately, Dane County now has the second highest mobile (air) lead pollution emissions of all of the 72 counties in Wisconsin. It should also be noted that such lead pollution also negatively impacts water (drinking) and soil. Kerosene-based Jet A also has its own set of equally toxic to human health chemicals and pollution emissions.

We strongly encourage enhancing public awareness of objective, complete information regarding the negative impacts of Morey Airport such as airplane overflights over *existing* noise sensitive land uses and the negative health impacts, many of which result in daily decibel levels over residences and schools that exceed the 80 decibel-level.

See Transportation Research Board – Airport Cooperative Research Program, Project Number 03-03 – Enhancing Airport Land Use Compatibility, *Developing a Framework for the Economic Assessment of the Costs of Airport Land Use Incompatibility*, Table 14 Adverse Health Effects of Excessive Noise, page 14:

- Hearing impairment
- Hearing pain
- Increased sensitivity to noise and annoyance
- Interference with communication and speech perception
- Sleep disturbance
- Psycho-physiological reactions during sleep (including effects on heart rate, finger pulse and respiration)

- Cardiovascular effects (e.g., Ischaemic heart disease)
- Stress
- Dulled startle reflex and orienting response (e.g. the person affected is less likely to respond to noise signals that matter e.g. approaching vehicles and dangerous machinery)
- Other effects on physical and psychological health including: nausea, headaches, irritability, argumentativeness, anxiety, nervousness, insomnia, abnormal somnolence (drowsiness) and loss of appetite
- Mental disorders
- Impaired task performance and productivity
- Deficits in reading acquisition in children
- Damaging effects on positive social behavior (e.g., willingness to help others).

[Available at: http://onlinepubs.trb.org/onlinepubs/acrp/acrp_rpt_027EconomicAssessment.pdf) and citing the source for Table 14 as the World Health Organization, *Community Noise*, Copenhagen, Denmark, 1993; the full *Community Noise* study is available here: <https://www.who.int/docstore/peh/noise/Comnoise-1.pdf>]

City Document, page 28, “Transportation”; page 29, Morey Airport ... “and serves as an attractive and neighborly gateway to the surrounding community.”

Town Comments: Please see related Town Comments on page 1.

City Document, page 51, “Strategy 6: Continue to plan for and operate Middleton Municipal Airport – Morey field in a manner that...supports regional economic development, recognizes sustainability...,and serves as an attractive and neighborly gateway to the surrounding community...Actions: A. Ensure that the airport master plan that is under development...the first since the City’s acquisition of C29 in 1998 – in response to continued requests for airplane hangar space...Guided by an advisory committee that includes a variety of airport stakeholders, including representatives from the Towns of Middleton and Springfield...”

Town Comments: The City of Middleton’s plan to change Morey Airport from a recreational airport to a commercial air cargo and business airport is not consistent with either the State Freight Plan or the 2035 Regional Transportation Plan. Moreover, implementation of such a significant expansion of Morey Airport would create significant land use incompatibility issues and reduce safety for the numerous existing residences, schools and other noise sensitive uses in the vicinity of Morey Airport. Such commercial freight and business operations should remain exclusively and more appropriately at Dane County Regional Airport only 9.9 miles from Morey Airport

Dane County Regional Airport is one of the six Wisconsin airports offering regular commercial air cargo services, according to the State of Wisconsin State Freight Plan 2017. See <https://wisconsin.gov/Documents/projects/sfp/chp5.pdf>. In addition, Dane County Regional Airport “has the capability of expanding ground facilities to accommodate growth of air cargo operations to meet potential future needs. Recent and ongoing improvements to the airports runways and taxiways serve not only air passenger growth, but air cargo carriers as well.” See 2035 Regional Transportation Plan, page 67, available at https://www.greatermadisonmpo.org/planning/documents/TransportationSystemPart4_000.pdf. The Regional Transportation Plan 2050 also highlights the importance of compatibility of uses near airports for freight and air. See https://www.greatermadisonmpo.org/planning/documents/RTP_2050_Executive_Summary_FINAL.pdf, page vii.

When Mead & Hunt presented the Morey Airport operations forecasts to the Airport Master Plan Advisory Committee on 9/24/2020 and the Appendices including the City of Middleton Morey Airport “Hangar Inquiry List” with 36 names on it, Mead & Hunt acknowledged that it was unaware that 47% or 17 of the people on that list were not listed in the FAA database as pilots calling into question the legitimacy of the “Hangar Inquiry List” proffered by the City to allegedly show “demand” at Morey Airport. It is also significant that Morey Airport has never met the FAA threshold of “Regular Use” requiring a minimum of at least 500 annual operations, excluding touch-and-go training operations, for federal funding for airport expansion. In accord, on 7/30/2020 the FAA only providing preliminary approval to the City of Middleton, which consisted of the approving only the Ch. 2 Forecast methodologies used and the estimates analysis completed for Morey Airport, but it did not provide justification to begin construction at Morey Airport. See FAA AC No. 150/5000-17, Critical Aircraft and Regular Use Determination, 6/20/17, available at https://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5000-17-Critical-Aircraft.pdf; and the FAA preliminary approval letter dated 7/30/2020 is available at <https://www.cityofmiddleton.us/455/Airport-Master-Plan>.

Sustainability is an important goal. The Town would welcome genuine efforts for sustainability at Morey Airport by the City that should include addressing the leaded aviation gas and Kerosene-based Jet A aviation gas pollution issues generated at Morey Airport, protection of invaluable migratory and other bird and wildlife populations nesting and feeding in the natural and wetland areas in the vicinity of Morey Airport, and protection of the wetlands also as an environmentally important site groundwater recharge area that cannot be replicated.

The City of Middleton Common Council appointed various persons to the newly formed, temporary Morey Airport Master Plan Advisory Committee (“AMPAC”) in the spring of 2019 with its first meeting held on 4/11/2019. At its 9/15/2020 City of Middleton Common Council Meeting, the Council appointed an additional Member to the AMPAC thereby increasing its membership from twelve to thirteen, which are all considered public officials under Wisconsin Ethics Laws.

Despite the Council’s conclusory proclamation at its 8/6/19 City Council Meeting to the contrary, a number of AMPAC Members have conflicts-of-interests and should not be allowed to

vote on Morey Airport “Development Alternatives” at the yet to be rescheduled next AMPAC Meeting. It should also be noted that the Morey Airport “Development Alternatives” for more development will all require the taking of private property by Eminent Domain, including prime agricultural farmland. We urge the City to take Compatible Land Use Planning into consideration, which we understand was raised by Mead & Hunt with the City as recently as 3/7/18, but apparently declined.

According to the City of Middleton Code of Ethics (March 2020), s. 2.20 (6)(a) Statement of Purpose (1) “The proper operation of democratic government requires that public officials and employees be independent, impartial and responsible to the people; ...that the public office not be used for personal gain; and that the public has confidence in the integrity of it’s government. In recognition of these goals, there is hereby established in this Chapter a Code of Ethics for all City of Middleton officials and employees, whether elected or appointed, paid or unpaid, including members of boards, committees and commissions of the City...(2)...The Common Council hereby reaffirms that each elected and appointed City official and employee holds his or her position as a public trust and any intentional effort to realize substantial personal gain through official conduct is a violation of that trust...(b) Definitions...(1) Public Official. Means...all members appointed to boards, committees and commissions established or appointed by the Mayor and/or Common Council pursuant to this Code of Ordinances, whether paid or unpaid. (2) Public Employee. Means any person excluded from the definition of a public official who is employed by the City. (3) Anything of Value. Means any gift, favor, loan, service or promise of future employment...(4) Business. Means any corporation, partnership, proprietorship, firm, enterprise, franchise or here, association, organization, self-employed individual or any other legal entity which engages in profit making activities...(7) Financial interest. Any interest which shall yield, directly or indirectly, a monetary or other material benefit to the officer or employee or to any person employee or to any person employing or retaining the services of the officer or employee.”

In accord, the Wisconsin Statutes §19.59, Codes of ethics for local government officials, employees and candidates, (1)(a) states, “No local public official may use his or her public position or office to obtain financial gain or anything of substantial value for the private benefit of himself or herself or his or her immediate family, or for an organization with which he or she is associated...”, and under (c) states, “no local public official may:

1. Take any official action substantially affecting a matter in which the official, a member of his or her immediate family, or an organization with which the official is associated has a substantial financial interest.
2. Use his or her office or position in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the official, one or more members of the official's immediate family either separately or together, or an organization with which the official is associated.”

The now 13-member AMPAC is an FAA Technical Advisory Committee with a minority of citizen members, and not an FAA Citizen Advisory Committee. There is only one AMPAC Citizen Member from the Town of Middleton and only two AMPAC Citizen Members from the

Town of Springfield, both impacted municipalities. All other AMPAC Members, as of 9/15/2020, are from the City of Middleton, and the following four AMPAC Members have material conflicts-of-interest and should be disqualified from voting on the Morey Airport Master Plan Development “Alternatives”.

1. Robert Burck:
 - a. City of Middleton Common Council Member Alderman;
 - b. Member of the City of Middleton Morey Airport Commission;
 - c. Current Chair of the AMPAC; and
 - d. Member of the Board of Directors of the Middleton Area Development Corporation (MADC), which has been involved in non-public discussion/negotiation for the possible sale of the Morey Airport Terminal from its owner, the Middleton Area Development Corporation, to the potential buyer, the City of Middleton, as recommended by the Morey Airport Commission and authorized by the City of Middleton Common Council on 6/16/2020.
2. Deana Porter:
 - a. Appointed on behalf of the Middleton Area Development Corporation) and serve “As a representative of MADC and its ownership of the property at the airport” (owner of the Morey Airport Terminal);
 - b. “Currently serve on the ...Board of Directors Middleton Chamber of Commerce”;
 - i. 2020 President Elect of the Middleton Chamber of Commerce.
3. Richard Morey:
 - a. Does not live in a municipality impacted by Morey Airport operations.
 - b. Morey Airport Manager for the City of Middleton;
 - c. Fixed-Base Operator at Morey Airport; and
 - d. Owner of Morey Airplane Company. Note: at the 9/17/2018 Airport Commission Meeting, Mr. Morey’s conflicts-of-interest were acknowledged by Mead & Hunt and at least one Airport Commission Member.
4. Jade Hofeldt:
 - a. Does not live in a municipality impacted by Morey Airport operations.
 - b. CEO and co-owner of Capital Flight LLC that relocated from Dane County Regional Airport to Morey Airport after City of Middleton Common Council approval in July 2015.

Other items of note:

5. Mike Frank:
 - a. Appointed to represent the Middleton Chamber of Commerce;
 - i. 2020 President of the Middleton Chamber of Commerce.
6. Ray Fey:
 - a. Member of the City of Middleton Morey Airport Commission.
7. Kevin Munson:
 - a. Member of the City of Middleton Morey Airport Commission.

Moreover, the AMPAC Members have been advised that after AMPAC votes on Morey Airport Development “Alternatives”, the Morey Airport Commission will vote based on the AMPAC recommendation. It is also noteworthy that:

1. Three Morey Airport Commission Members (the Morey Airport Commission has 7 members total) have also been appointed as AMPAC Members, so they will vote a second time on this matter; and
2. The Morey Airport Commission Chair is not a City of Middleton resident, is an elected official of another municipality, lives more than 16 miles from Morey Airport, and experiences no impacts from Morey Airport operations.

At best, there are only six (of 13) AMPAC Members representing citizens interests on this important matter that will impact the community for many years into the future.

City Document, page 52, “B. ...minimize the potentially negative impact of below-pattern altitude flights over residential areas surrounding the airport...According to 2019 population estimates, approximately 14,000 people now live within two miles of either end of the primary runway... Aircraft noise complaints have increased over the years, particularly since 2017, so in 2019 the City supplemented a dedicated phone hotline with an online reporting form...and updated the airport’s noise abatement procedures to help minimize disruptions to noise-sensitive areas...The airport manager and the Airport Commission should frequently review the noise complain log...”

Town Comments: Please delete the word “potentially” from “minimize the potentially negative impacts of below-pattern altitude flights over residential areas surrounding the airport...”. There is nothing potential about these actual, daily, disruptive, often times low altitudes (below 1,000 ft minimum safe altitude for congested areas) Morey Airport airplane overflights over densely populated residential areas and schools that cause noise, vibrations, fumes, deposits of dust, fuel particles, fear, and interference with sleep or communication for people on the ground. Currently, there is no *effective* noise reduction policy or procedure in place at Morey Airport where unfortunately, unpredictable, ongoing disruptive day and nighttime Morey Airport airplane operations already interfere with intended activities on a daily basis.

Implementation of a right turn procedure at Morey Airport would mitigate a number of the Morey Airport airplane noise impacts over residences and schools to the west and south of the Airport, and should be implemented immediately. The Attached Map (Source: Draft 2020 City of Middleton Comprehensive Plan Update) clearly identifies the benefits of utilizing a right-hand traffic pattern (dashed magenta line) for operations on Runway 28 (as opposed to the current left-hand traffic pattern) by directing aircraft operations over agricultural land, therefore, reducing existing and future impacts to noise sensitive land uses around Morey Airport.

According to the FAA, right turn traffic patterns may be implemented to avoid noise sensitive areas as evidenced by the seventeen Wisconsin airports in 2019 with right turn traffic patterns

(Source: FAA AC No. 90-66B, Change 1, 2/25/2019, Section 11.1, available at https://www.faa.gov/regulations_policies/advisory_circulars/index.cfm/go/document.information/documentid/1032988; Wisconsin Dept. of Transportation Bureau of Aeronautics Wisconsin Non-Standard Traffic Patterns 2019 Map available at <https://wisconsindot.gov/Documents/travel/air/airport-info/non-std-traf.pdf>).

Furthermore, it is misleading to focus on the area only two miles from Morey Airport, when in fact it is well documented that aviation accidents actually occur within *five* miles of an airport. According to the Wisconsin Department of Transportation, Bureau of Aeronautics, most aviation accidents occur within five miles of an airport, and more than 50 percent of accidents occur during takeoff and landing. Figure 2-3: Arrival Accidents, in the Wisconsin Department of Transportation, Bureau of Aeronautics, *Wisconsin Airport Land Use Guidebook (June 2011)*, shows the wide spatial distribution of arrival aviation accidents occurring within 25,000 feet, or approximately five miles, of the runway, citing its source as the California Airport Land Use Planning Handbook (January 2002).

The Town of Middleton is specifically requesting that the City insert into its Draft 2020 Comprehensive Plan the balance and aviation priorities language of “Minimizing airport noise impacts on nearby communities” and “Protecting natural resources” contained in 49 U.S.C. §47101, and insert the relevant language in the U.S. Department of Transportation, National Plan of Integrated Airport Systems (NPIAS) 2021-2025, “Airports should be compatible with surrounding communities, maintaining a balance between the needs of aviation, the environment, and the requirements of residents.” (See NPIAS 2021-2025, Chapter 1, page 3, available at https://www.faa.gov/airports/planning_capacity/npias/current/media/NPIAS-2021-2025-Narrative.pdf).

Unfortunately, similar language in the 2006 City of Middleton Comprehensive Plan has now been deleted, and we are specifically requesting that the above language, as quoted, be inserted into the City of Middleton 2020 Comprehensive Plan under the Transportation Element regarding Morey Airport.

Moreover, it is significant and should be added to the City of Middleton 2020 Comprehensive Plan, Transportation Element regarding the City of Middleton Morey Airport Polco User Survey (#1), Question No. 17 – Does the current length of primary Runway 10-28 at C29 post constraints to your operations? Responses: NO 93%; and Question No 34 : Please rate the condition of the airport facilities and services, Runway Length – Responses: 84% said “Excellent or Good”. See Mead & Hunt, Ch. 3 Facility Requirements (Draft – October 22, 2020), Table 3-15: Excerpts of User Survey Questions Pertaining to Primary Runway Length, page 3-23 available at <https://www.cityofmiddleton.us/455/Airport-Master-Plan>.

The City of Middleton’s current noise policy, procedures, and reporting structure is not working. The pattern altitude is too low when measured only from the end of the west runway (928 Mean Sea Level) as elevations to the west and south (including the existing, incompatible left turn procedure at Morey Airport) go as high as 1,180 feet, which must be taken into consideration by Morey Airport. These higher elevations result in daily, numerous low overflights that raise

significant safety concerns for families on the ground living and going to school in the vicinity of Morey Airport.

In order to significantly improve and reduce the increased number of noise and Morey Airport low altitude and overflight complaints due to more frequent, louder Cirrus (since July 2015) and other Morey Airport Airplane overflights, the City should create an independent body comprised of equal members of citizens from affected neighborhoods and schools in the vicinity of Morey Airport, including but not limited to the City of Middleton, the Town of Middleton, and the Town of Springfield. This independent body could monitor and respond in a meaningful way to reduce and/or eliminate the negative impacts of Morey Airport operations on the residential areas in the vicinity of the Airport, “one of the densest airport environments around” according to the Airport Commission Chair. Cirrus airplanes fly over residences and schools at a disruptive noise level that exceeds the 80 decibel-level, as well as other loud Capital Flight LLC and Morey Airport related airplane overflights exhibiting little to no regard for these noise sensitive areas.

It is interesting to note that at least one C29 pilot who lives in Madison is very concerned, and has been publicly vocal, about the possibility of adding lights and amplified sound for some fall evening football games at Edgewood High School, yet, casually, publicly is dismissive of the significant safety, noise, and health concerns raised by residents living in the vicinity of Morey Airport. The pilot has also publicly stated that “Edgewood is stating the sound level in a misleading way” as he “wants to measure peaks” in the noise level. He claims that on one touchdown play where he measured the sound-level, “he measured the crowd noise at 87 decibels.” We would welcome a similar attention to detail for the daily, ongoing airplane noise disturbances that are frequently in excess of 80 decibels from Morey Airport operations over residences and schools located in the Town of Middleton and the Town of Springfield.

City Document, page 53, “...preferably prevent incompatible land uses in the vicinity of the airport...within a 3-mile circumference...More broadly, the City needs to work with the Towns of Middleton and Springfield and Madison to reduce the risk of future...incompatible land uses...”

Town Comments: We strongly urge the City of Middleton to work with the Towns of Middleton and Springfield to evaluate in a fact-based manner, and implement, a right turn procedure at Morey Airport to alleviate existing daily, disruptive Morey Airport airplane noise, low altitude overflights, and to reduce mobile (air) lead and related aircraft pollution over residences, schools and other *existing* land uses to the west and south of Morey Airport (Please see the Town of Middleton’s airport consultant’s analysis dated 10/27/2020, page 7, regarding recommended implementation of a right turn procedure at Morey Airport available at <https://town.middleton.wi.us/airport>). Moreover, implementation of a Morey Airport right turn procedure would significantly improve the Airport Commission’s 6/4/2020 new noise “abatement” procedure, which has actually resulted in an *increase* in Morey Airport airplane noise over residences and schools located to the west of Morey Airport.

Again, implementation of a right turn procedure at Morey Airport would mitigate a number of the Morey Airport airplane noise impacts over residences and schools to the west and south of the Airport, and should be implemented immediately. The Attached Map (Source: Draft 2020 City of Middleton Comprehensive Plan Update) clearly identifies the benefits of utilizing a right-hand traffic pattern (dashed magenta line) for operations on Runway 28 (as opposed to the current left-hand traffic pattern) by directing aircraft operations over agricultural land, therefore, reducing existing and future impacts to noise sensitive land uses around Morey Airport.

Housing

City Document, page 61, “...the preference expressed during public input sessions was for preservation of farmland outside of the City limits over development of farmland.”

Town Comments: We strongly agree with the public input to preserve farmland as it is invaluable, and prime farmland cannot be replaced for agriculture use after it has been developed.

Economic Development

City Document, page 81, “Actions...C. Improve the Middleton Municipal Airport to better serve the Middleton business community...Middleton Municipal – Morey Field Airport...Local Economic Impact...”

Town Comments: As previously noted in Town Comments on page 1, according to the City of Middleton’s Airport consultant, Mead & Hunt, “Recreation is the most prominent use” at Morey Airport (See Mead & Hunt, Ch. 2 Aviation Demand Forecasts (July 2020), page 2-8; Available at: <https://www.cityofmiddleton.us/455/Airport-Master-Plan>; See also City of Middleton Draft 2020 Comprehensive Plan page 51, “Airport Use” graph, Source: Draft Airport Master Plan Figure 2.2.). Incompatible land use has costs. What is the value of a statistical life for increasing the risk of an aviation related fatality and injury for families on the ground living in the vicinity of Morey Airport? These are the trade-offs the City must consider and the City should be asking Mead & Hunt to conduct a third-party risk analysis and a compatible land use analysis *before* any AMPAC scoring, voting or approving any Morey Airport “Development Alternatives”. See Transportation Research Board – Airport Cooperative Research Program Project Number 03-03 – *Enhancing Airport Land Use Compatibility* available at http://onlinepubs.trb.org/onlinepubs/acrp/acrp_rpt_027EconomicAssessment.pdf.

According to the City of Middleton’s Airport consultant, Mead & Hunt, “Recreation is the most prominent use” at Morey Airport (See Mead & Hunt, Ch. 2 Aviation Demand Forecasts (July 2020), page 2-8; Available at: <https://www.cityofmiddleton.us/455/Airport-Master-Plan>; See also

City of Middleton Draft 2020 Comprehensive Plan page 51, “Airport Use” graph, Source: Draft Airport Master Plan Figure 2.2.). Trying to convert Morey Airport from a recreational use airport to a commercial use, including cargo, airport is wholly incompatible with *existing* land uses in the vicinity of Morey Airport and would most certainly reduce the quality of life, reduce property values, and significantly decrease safety for families living within five miles of Morey Airport.

Noise is defined as unwanted sound. Livability is the absence of nuisance and the presence of quietness. The need for quiet is universal and can increase human health and wellbeing, of which having a quiet home and a quiet place outdoors are fundamental elements. But for Morey Airport airplane overflight noise, ambient noise levels in the Town of Middleton are typically very quiet, one of the attributes we highly value. See *Quiet Areas and the Need for Quietness in Amsterdam*, by Hester Booi and Frits van den Berg, Int J Environ Res Public Health. 2012 Apr;9(4):1030-50. doi: 10.3390/ijerph9041030. Epub 2012 Mar 23, available at <https://pubmed.ncbi.nlm.nih.gov/22690181/>.

Disruptive airplane noise is an example of a negative externality with uncompensated external cost that must be taken into account when Morey Airport “Development Alternatives” are considered. Livability and wellbeing have already been negatively impacted by *current* Morey Airport operations for families living in the vicinity of Morey Airport. Any expansion of Morey Airport will only increase these negative externalities, including but not limited to noise, vibrations, fumes, deposits of dust, fuel particles, fear, and interference with sleep or communication for people on the ground.

Maintaining a healthy tax base is a key municipality objective, which will be negatively impacted by Morey Airport expansion in this densely populated area. In one widely cited study, Hedonic Property Value Studies of Transportation Noise: Aircraft and Road Traffic, January 2008, by Jon P. Nelson, Pennsylvania State University, available at <https://citeseerx.ist.psu.edu/viewdoc/download?doi+10.1.1.528.2560&rep=rep1&type=pdf>, an airport expansion to accommodate a regional air-cargo hub for Federal Express had a significant negative impact on home values. The airport expansion caused properties closest to the airport (within 2.5 miles) to sell at a discount of 0.2% before the airport expansion announcement and a discount of 9.4% after the airport expansion announcement. Houses further from the airport (2.5 to 4.0 miles) sold at a discount of 2.7% before the announcement and a discount of 8.3% after the announcement. Both of the differences are statistically significant and represented the anticipated, and then actual, significant increase in airplane noise levels due to the airport expansion.

Airplane overflights and noise from Morey Airport is a very real problem in the Middleton area causing, for example, the “Middleton pause” due to interrupted conversations because of loud, disruptive Morey Airport airplane overflight noise. See, *Noise that Annoys, Regulating Unwanted Sound*, Environmental Health Perspectives, Volume 113, Number 1, January 2005, available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1253730/pdf/ehp0113-a00042.pdf>.

With respect to the Economic Impact information on page 81, economic impact analysis should not be confused with a benefits-costs analysis economic valuation. Whereas, regional economic impact is not typically considered in economic analysis because it represents only a *transfer* of resources from one region to another, from one industry to another, or from one stakeholder group to another. Economic valuation of airplane noise is important in determining the full costs of aviation and airport users should pay for the cost of noise as some have referred to as making polluters pay. See Transportation Research Board – Airport Cooperative Research Program Project Number 03-03 – *Enhancing Airport Land Use Compatibility* available at http://onlinepubs.trb.org/onlinepubs/acrp/acrp_rpt_027EconomicAssessment.pdf.

Economic impact analysis merely provides an estimated measure of economic activity, which here, has not been separated out from the much larger Dane County Regional Airport or City of Madison. The Wisconsin Department of Transportation, Bureau of Aeronautics, prepared the 2019 Economic Impact Report for C29 for the City of Middleton using IMPLAN software input-output multiplier metrics. This report was provided to the City so it could try to garner public support for creating a commercial airport that would compete with Dane County Regional Airport only 9.9 miles from Morey Airport. Such public support for Morey Airport expansion is highly unlikely based on the negative public sentiment expressed to date.

Moreover, when the City of Middleton bought Morey Airport in 1998, Bob Blettner of the Blettner Group proposed building another Business Park on the north side of Airport Road that he estimated would create an additional tax base for the City of Middleton of \$102,600,000, which would have generated approximately \$1.5 million per year in additional school taxes, which he described as “manna from heaven,” free money to the school district (expressed in 1998 dollars). We all support the Middleton-Cross Plains School District, which would welcome increased funding, particularly during this unprecedented COVID-19 public health pandemic.

City Document, page 78, “Urban Greenway Study Map”...Confluence Pond...Quisling Park, Firefighters Memorial Park...

Town Comments: Please protect and preserve in particular the Confluence Pond area that borders the City of Middleton and the Town of Middleton. Increasingly, the negative impacts of Morey Airport low altitude airplane operations are making this area unsafe, noisy, and polluted from Morey Airport Airplane emissions and hazardous to migratory bird and other area wildlife. Such ever-increasing disruptions do not comport with the definition of a “Greenway” intended for environmental protection and recreational use. Please take affirmative steps to mitigate and improve the ongoing degradation of the quality of life from Morey Airport operations for the *existing* residential areas in the vicinity of Morey Airport.

Character (a/k/a Agriculture, Natural and Cultural Resources)

City Document, page 91, “A sense of place is a unique collection of qualities and characteristics – visual, cultural, social, and environmental – that provide meaning to a location. Sense of place is what makes one city or town different from another, but sense of place is also what makes our physical surroundings worth caring about.”

Town Comments: We strongly agree and want to preserve without undue interference from the City of Middleton and its Morey Airport operations that increasingly disturbs the beautiful natural and tranquil environment we highly value in the Town of Middleton and Town of Springfield.

Green City (a/k/a Agriculture, Natural and Cultural Resources)

City Document, page 93, “Green City...Middleton will respond to disruptive changes in our climate, ecological and social systems in ways that connect us to an emerging future rather than by reacting against the patterns of the past – which can mean perpetuating systems that are not sustainable (...profit-oriented decision-making that does not protect people’s and the environment’s well-being)...The air we breathe...and the groundwater sources that supply our drinking water cut across multiple municipalities. Migration routes for our Sandhill Cranes don’t stop at city boundaries. Middleton must collaborate with surrounding communities...A new Green Economy is taking shape in our region in response to climate change and this creates an opportunity for Middleton to become early adopters...”

Town Comments: We strongly agree. Please take a more visionary, longer view into consideration with respect to Morey Airport as electric and hybrid airplanes are emerging with significant advances in battery technology as the new “green” way to fly requiring shorter runways (1,000 feet or less), quieter, and with little or no pollution emissions. See, for example, 11/10/2020 Scientific American article, *Electric Aviation Could Be Closer Than You Think, Enabling air travel to decarbonize*, by Katherine Hamilton and Tammy Ma, available at <https://www.scientificamerican.com/article/electric-aviation-could-be-closer-than-you-think/>

City Document, page 106, “Strategy 3: Protect and enhance...public lands and open space...and provides recreation, beauty, tranquility...is a defining feature of Middleton and contributes to the quality of life for residents and visitors alike.”

Town Comments: We strongly agree and value our natural environment and open space beauty and tranquility as much as the City of Middleton does. Please don’t continue to degrade the quality of life for Town and City residents with disruptive Morey Airport operation impacts

where our mutual goal should be to prevent, minimize or eliminate such impacts through dialog and cooperation, not increasing such negative impacts.

City Document, page 116, “Strategy 6: Celebrate and protect our shared watersheds...Actions. A. Celebrate and promote the value of our streams, creeks, and wetlands, and recognize their importance to our socio-economic and ecosystem health as a community through regular public engagement...B. Preserve the role of wetlands...and valuable wildlife habitat...”

Town Comments: We strongly agree. It is difficult to reconcile the City of Middleton allowing the invaluable Bobolink nesting grounds that used to be at Morey Airport to be permanently disturbed out of existence in 2020. Transparency and meaningful public engagement are the bedrock of good government.

City Document, page 119, Drawing showing a picture of an airplane and states “Reduction of Acoustic pollution.”

Town Comments: An “o” appears to be missing from the word “acoustic”. In addition, noise, defined as unwanted sound, is comprised of its acoustical properties and its interference with intended activities. See *Basner, et. al: Aviation noise impacts*, Appendix A, Background, Including Noise Terms and Definitions, Noise & Health, Vol. 19, Issue 87, March-April 2017, available at

https://www.noiseandhealth.org/articles/2017/19/87/images/NoiseHealth_2017_19_87_41_204623_sm1.pdf.

We would very much appreciate the City making a genuine effort to work cooperatively with the Town of Middleton and the Town of Springfield to reduce Morey Airport airplane overflight, noise, and low altitude flight paths, particularly those high decibel overflights at altitudes below the safe minimum altitude of 1,000 feet for “congested” residential and school areas to the west and south.

Governance and Partnerships (a/k/a Intergovernmental Cooperation)

City Document, pages 128 -129, “The City has intergovernmental agreements (IBAs) with four municipalities, as summarized on this page and the next one. The full IGAs can be found as appendices.” (Note: the “appendices” have not been provided by the City)...”Town of Middleton, City and Town of Middleton entered into an IGA in 1994 (later modified in 2020...”

Town Comments: Please correct the accuracy of the information provided by the City on these two pages as it relates to the Town of Middleton. Specifically, we are requesting that the 1994 and 2000 agreement amendment be referred to as a “Wis. Stats. §66.0301 Intergovernmental cooperation agreement and amendment, and that in 2020, the Town of Middleton petitioned the City of Middleton for a more comprehensive boundary agreement per Wis. Stats. §66.0307.”

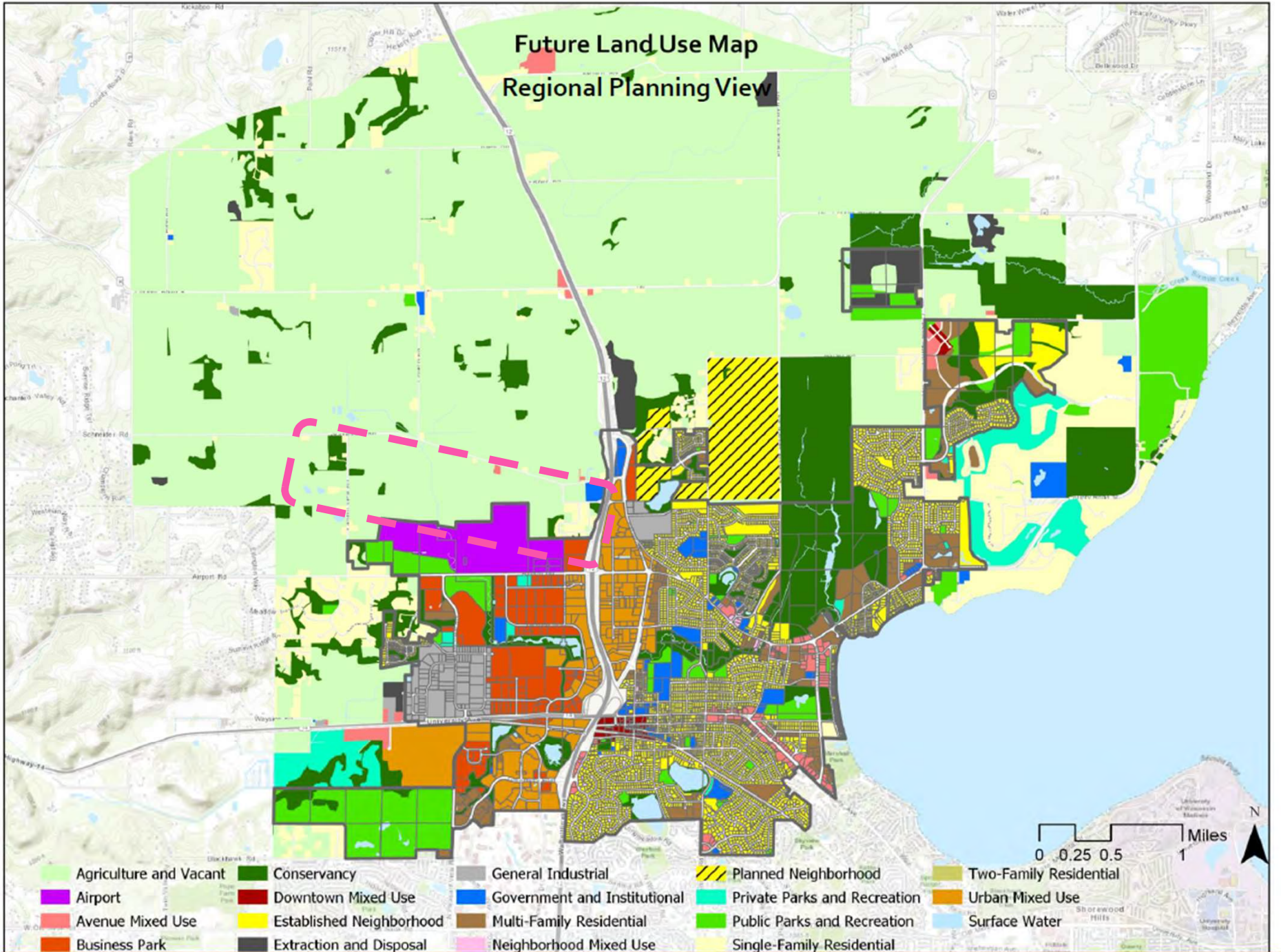
Conclusion

In conclusion, we hope that the previous cooperation between the Town of Middleton and the City of Middleton returns. We also ask that the City of Middleton be proactive and not wait for the inevitable catastrophic aviation event to occur in the vicinity of Morey Airport as too-close-for-comfort incidents have already occurred, whether such incidents involve a low flying, high speed Cirrus airplane from Capital Flight in close proximity on the same trajectory as a slower, low flying private helicopter or a Morey Airplane Company airplane flying lower than a flock of migratory birds. Effective risk management can control, eliminate, or reduce hazards and improve safety for those living within five miles of Morey Airport. All of the Morey Airport “Development Alternatives” currently under consideration by the City of Middleton will needlessly decrease property values and the quality of life for families living in the vicinity of Morey Airport, and will significantly increase the aviation accident risk for people on the ground, including, but not limited to:

- More aircraft operations
- Heavier aircraft flying at faster speeds
- More nighttime operations, including cargo airplanes
- More than one runway
- Longer runways
- More IFR (instrument) flights vs. current VFR (visual) flying
- More multi-engine airplanes vs. current single-engine airplanes

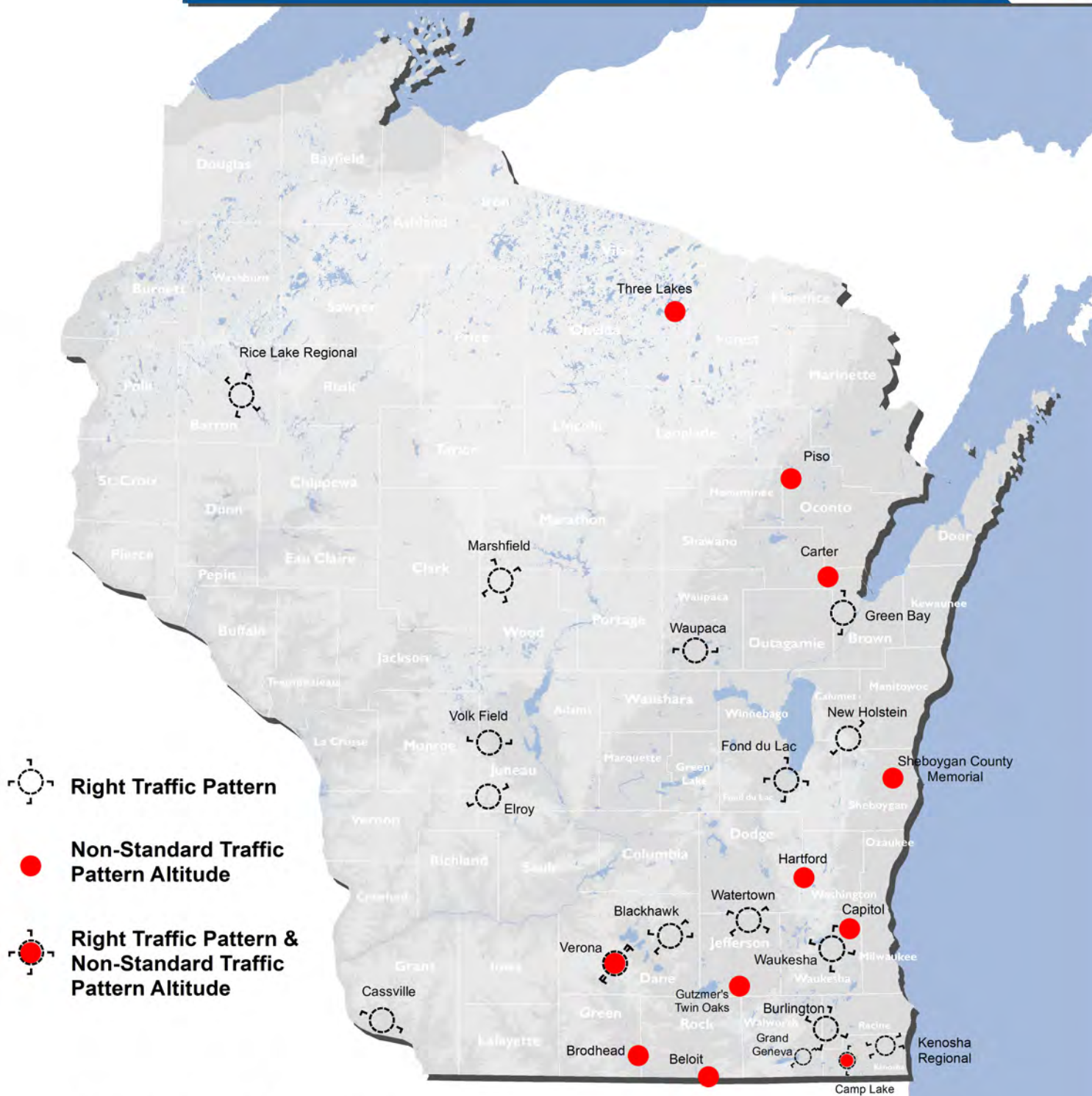
This is an unacceptable level of risk for families living and going to school in the vicinity of Morey Airport, which has also been described by the Airport Commission Chair in May 2019 as “one of the densest airport environments around”, stating, ”I would not train at C29”, and further stating, “Add in instrument and turbine straight in flights and you have chaos.” Dane County Regional Airport is only 9.9 miles from Morey Airport.

Future Land Use Map Regional Planning View



Wisconsin Non-Standard Traffic Patterns

2019



Right Traffic Pattern

Non-Standard Traffic Pattern Altitude

Right Traffic Pattern & Non-Standard Traffic Pattern Altitude

| Non-Standard Traffic Pattern Altitude | | |
|---------------------------------------|-------|-----------------------------------|
| Airport | LOCID | Traffic Pattern Altitude (FT AGL) |
| Beloit | 44C | 700 |
| Brodhead | C37 | 800 |
| Camp Lake | 49C | 600 |
| Capitol | 02C | 800 |
| Carter | 92C | 800 |
| Gutzmer's Twin Oaks | 5Y3 | 800 |
| Piso | 7P5 | 500 |
| Sheboygan County Memorial | SBM | 800 |
| Three Lakes Municipal | 40D | 800 |
| Verona | W19 | 600 |

| Right Traffic Pattern | | | | | |
|-----------------------|-------|-----------|------------------------|-------|-----------|
| Airport | LOCID | Runway(s) | Airport | LOCID | Runway(s) |
| Blackhawk | 87Y | 04, 27 | Marshfield Municipal | MFI | 05, 16 |
| Burlington Municipal | BUU | 19, 29 | New Holstein Municipal | 8D1 | 22 |
| Camp Lake | 49C | 36 | Rice Lake Regional | RPD | 01, 31 |
| Cassville Municipal | C74 | 11 | Verona | W19 | 03, 04 |
| Elroy | 60C | 24 | Volk Field* | VOK | 27 |
| Fond du Lac County | FLD | 09, 18 | Watertown Municipal | RYV | 05, 11 |
| Grand Geneva Resort | C02 | 05 | Waukesha County* | UES | 28, 36 |
| Green Bay* | GRB | 18 | Waupaca Municipal | PCZ | 10, 28 |
| Kenosha Regional* | ENW | 07R, 25R | | | |

*When GRB, ENW, VOK, and UES towers are closed.

This map was created by the Wisconsin Department of Transportation's Bureau of Aeronautics. Any use or recompilation of the information, while not prohibited, is the sole responsibility of the user. WisDOT expressly disclaims all liability regarding fitness of the use of this information for other than DOT business.