

—TOWN OF—
MIDDLETON
Wisconsin

February 9, 2022

To: Craig M. Thompson, WI Dept. of Transportation, Secretary; DOTExec@dot.wi.gov;
craigm.thompson@dot.wi.gov

Dear Secretary Thompson:

The Town of Middleton retained the services of Trinity Consulting in 2021 to assist the Town with studying airborne lead emissions from leaded aviation gas at the City of Middleton's Airport ("Morey Airport" or "C29"). As you may know, Trinity Consulting, and its airborne lead emissions modeling experts, have worked on projects for the highly regarded National Academies of Sciences, Engineering, and Medicine's Airport Cooperative Research Program ("ACRP"). ACRP is authorized by Congress and sponsored by the Federal Aviation Administration, and managed by the Transportation Research Board.

The enclosed preliminary Trinity Consulting modeling map shows the areas covered by breathable airborne lead particles emitted by aircraft operating in and out of the City of Middleton's Morey Airport on a daily basis. These aircraft produce over 217 pounds of airborne lead per year over the areas indicated. In addition, to the lead particles the EPA notes that Morey Airport operations are responsible for nearly 260,000 pounds of the following airborne pollutants annually:

1. Total CAPs (Six air pollutants: particulate matter, photochemical oxidants and ground-level ozone, carbon monoxide, sulfur oxides, nitrogen oxides, and **lead**) – 250,066 pounds per year.
2. Total VOCs (Volatile organic compounds: Chemicals emitted as gases from certain solids or liquids. VOCs include a variety of chemicals, some of which may have short- and long-term adverse health effects.) – 6,868 pounds per year.
3. Total HAPs (Hazardous Air Pollutant – Substances which are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects.) – 2,433 pounds per year.

Millions of federal dollars are being spent by the State of Wisconsin to remove and replace water pipes containing lead in the City of Milwaukee, and elsewhere in Wisconsin, to reduce or prevent children ingesting even small amounts of this toxic substance, which is very dangerous to their health (<https://www.dhs.wisconsin.gov/lead/health-effects.htm>). This current federal funding allocation is a finite resource that, unfortunately, is insufficient to completely remedy the lead problem in all water service lines. However, it will certainly be a step in a positive direction. The State of Wisconsin, through the Department of Transportation and its Bureau of Aeronautics, provides federal and state funds annually to the City of Middleton's Morey Airport. These funds are used in multiple ways to facilitate daily deposits of small breathable airborne

7555 W. OLD SAUK ROAD | VERONA, WI 53593 | Phone: 833-5887 | Fax: 833-8996 |

www.town.middleton.wi.us | info@town.middleton.wi.us

lead particles over at least nine schools (over 7,000 children), parks, and thousands of residences in the Middleton area (see attached map).

There is no safe level of lead in humans, especially children. Lead exposure is cumulative and cannot be readily removed from the body once ingested. Breathable airborne lead particles are more dangerous to children than most other forms of lead pollution and the only effective treatment is prevention (<https://pubmed.ncbi.nlm.nih.gov/33100835/>). Children in relatively close contact with general aviation airports cannot avoid some degree of lead poisoning (Miranda Study at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3230438/>; Zahran Study at <https://news.sccgov.org/sites/g/files/exjcpb956/files/documents/RHV-Airborne-Lead-Study-Report.pdf>).

As Vice President Kamala Harris stated while visiting Milwaukee on Monday, 1/24/22: “Eliminating lead exposures in our nation must be among our nation’s highest priorities.”

It is wholly inconsistent and ill-advised for one arm of state government to use federal and state funds to prevent child lead exposure from water pipes in Milwaukee and elsewhere across Wisconsin, while at the same time another arm of state government is providing federal and state funds to continue and increase daily child lead exposure in the Middleton area from recreational general aviation aircraft.

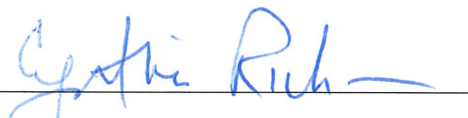
The City of Middleton’s Morey Airport is a recreational/hobby airport that does not provide any essential services to the areas it effects.

The Town of Middleton formally objects to the Wisconsin Department of Transportation, through the Bureau of Aeronautics or otherwise, providing the City of Middleton’s Morey Airport with any federal or state funds that in any manner facilitate the continuation of or increase in airborne lead pollution in the Middleton geographic area.

In the public interest of open government and transparency, we trust that you will provide public notice and ample opportunities for public input and comment on any such contemplated funding that may contribute to the continuation of or cause an increase in airborne lead pollution in the Middleton area from aircraft operations at Morey Airport (C29).

Sincerely,

Town of Middleton Board of Supervisors

By: 
Cynthia Richson, Town Chair

Attachment

Cc: Governor Tony Evers; EversInfo@wisconsin.gov

Maggie Gau, Governor Evers Chief of Staff; Maggie.gau@wisconsin.gov

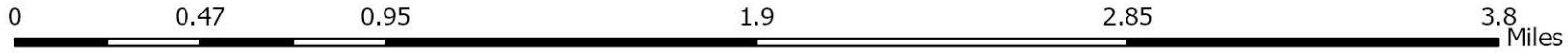
Brian Weaver, WI DHS, Governor Evers Lead Policy Advisor;
brian.weaver@dhs.wisconsin.gov

David Green, Director, WI Dept. of Transportation, Bureau of Aeronautics

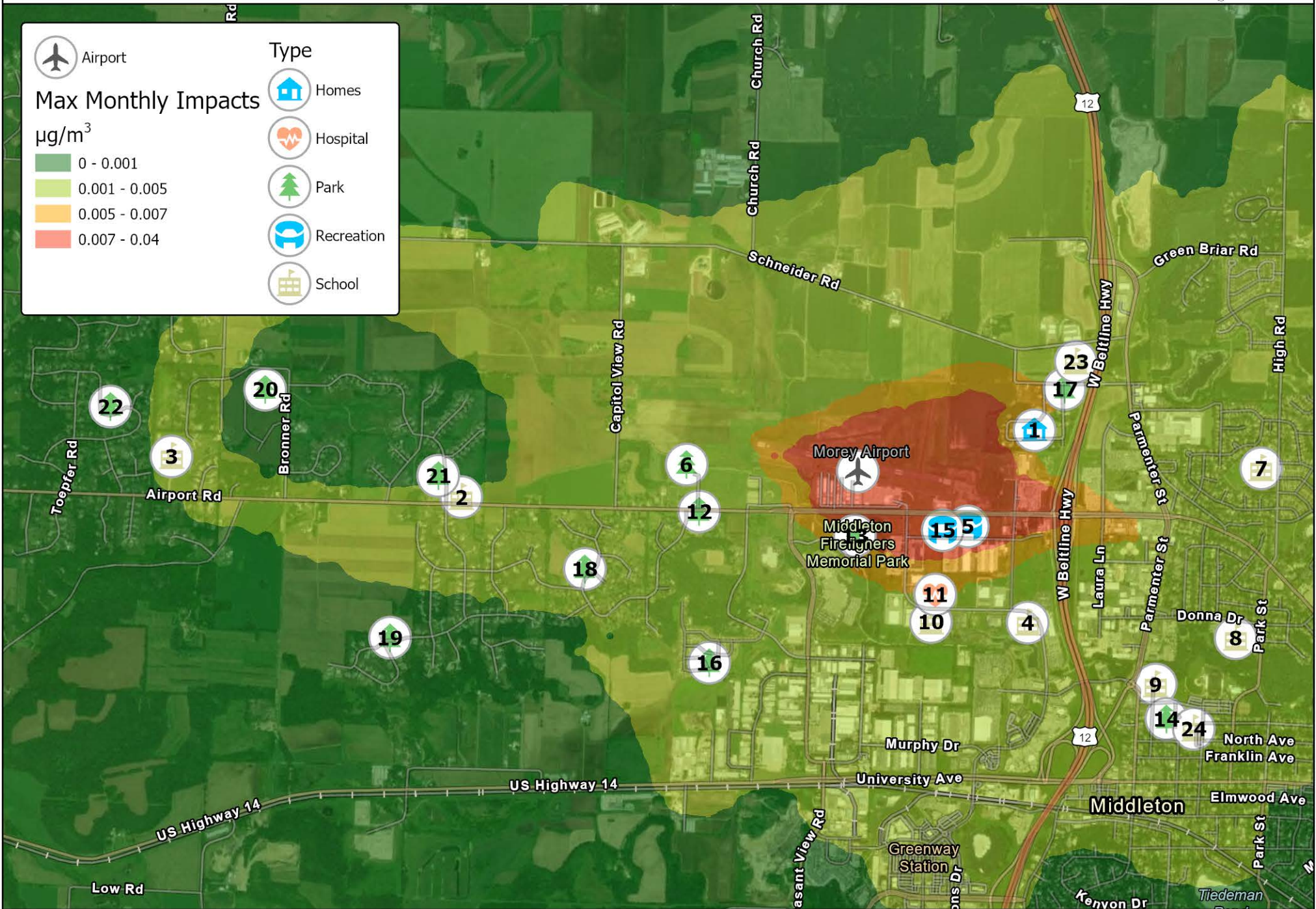
State Senator Jon Erpenbach; Sen.Erpenbach@legis.wisconsin.gov

State Representative Dianne Hesselbein, Assistant Minority Leader;
Rep.Hesselbein@legis.wisconsin.gov

Jim Pulvermacher, Town Board Chair, Town of Springfield;
chairperson@town.springfield.wi.us



Max Monthly Impacts		Type	
	Airport		Homes
$\mu\text{g}/\text{m}^3$			Hospital
	0 - 0.001		Park
	0.001 - 0.005		Recreation
	0.005 - 0.007		School
	0.007 - 0.01		
	0.01 - 0.04		



Points of Interest and Impacts from Nearest Receptors

ID	Description	Type	Max Season	$\mu\text{g}/\text{m}^3$	
				Monthly	Annual
1	Highwood Circle Estates	Homes	Autumn	0.0047	0.0017
2	Madison Montessori	School	Autumn	0.0011	0.0006
3	Sunset Ridge Elementary	School	Autumn	0.0014	0.0009
4	Primrose School of Middleton	School	Winter	0.0035	0.0015
5	Middleton Gymnastics Academy	School	Winter	0.0121	0.0067
6	Ed Tallard Park	Park	Autumn	0.0019	0.0012
7	Northside Elementary School	School	Winter	0.0016	0.0006
8	Kromrey Middle School	School	Winter	0.0021	0.0010
9	Clark Street Community School	School	Winter	0.0028	0.0016
10	Clubhouse For Kids II	School	Autumn	0.0044	0.0018
11	Miramont Behavioral Health	Hospital	Autumn	0.0054	0.0024
12	Penni Klein Park	Park	Autumn	0.0024	0.0012
13	Middleton Firefighters Memorial Park	Park	Autumn	0.0077	0.0040
14	Firemen's Park	Park	Winter	0.0019	0.0009
15	Keva Sports Center	Recreation	Autumn	0.0144	0.0082
16	Hinrichs Family Farm Park	Park	Winter	0.0017	0.0008
17	Murphy Park	Park	Autumn	0.0047	0.0013
18	Hickory Woods Park	Park	Autumn	0.0021	0.0012
19	Summit Ridge Park	Park	Winter	0.0006	0.0003
20	Vosen Memorial Park	Park	Autumn	0.0009	0.0005
21	Settler's Prairie Park	Park	Autumn	0.0009	0.0005
22	Enchanted Valley Park	Park	Autumn	0.0004	0.0003
23	Westside Christian School	School	Autumn	0.0043	0.0011
24	Middleton High School	School	Winter	0.0019	0.0008