

7 March 2005



Friends of  
Milwaukee's Rivers



WATERSHED  
WATCHERS



Governor Jim Doyle  
115 East  
State Capitol  
Madison, Wisconsin 53702

Dear Governor Doyle:

We know that as Governor and former Attorney General of our state, you share our appreciation for the importance of public involvement in critical matters facing Wisconsin. This is especially true in precedent-setting cases, and when public funds are spent. Therefore, we ask that you join us in insisting that the Wisconsin Department of Transportation (WisDOT) complete a comprehensive Environmental Impact Statement (EIS) before determining whether to use state and federal funds to expand the West Bend Airport.

As you may know, the West Bend Airport is a small, municipal airport that sits on the north bank of the upper reaches of the Milwaukee River. For several decades, this airport has been targeted for expansion as part of the Wisconsin's State and Regional Airport System Plans in order to accommodate forecasted growth in airport demand. This demand, however, has not been realized, and despite significant public opposition and interagency concerns regarding the purpose, need and proposed environmental impacts of the project, the WisDOT appears poised to issue a *Finding of No Significant Impact* (FONSI) and proceed with the project. This action would effectively enable WisDOT to dismiss their obligation to conduct a comprehensive environmental review (EIS) as called for by the National & Wisconsin Environmental Policy Acts (NEPA/WEPA).

**The U.S. Environmental Protection Agency (EPA), Wisconsin Department of Natural Resources (WDNR), and the Army Corps of Engineers (COE) have all weighed in with serious concerns regarding deficiencies in WisDOT's Preliminary Environmental Assessment for this project.** All three agencies have also questioned the underlying purpose and need for the project and have requested substantially more information to evaluate whether the stated project-needs actually justify the economic and ecological costs.

While interagency concerns alone warrant a more thorough environmental review for this project, **a sizeable coalition of grassroots groups have also organized in opposition to the proposed West Bend airport expansion.** We question whether WisDOT has adequately substantiated the purpose and need, considered all project alternatives (including a no-build or repair only alternative), and fully disclosed budget projections and compensatory mitigation plans for the project. The Wisconsin

Wetlands Association detailed these concerns, along with specific examples of the deficiencies in the preliminary Environmental Assessment, in a February 2 letter to WisDOT (copy enclosed). It is clear from WisDOT's response (also enclosed), that they are invoking a very narrow interpretation of their NEPA/WEPA obligations for this project and do not believe the very legitimate procedural and ecological concerns outlined in our correspondence merit further environmental review or public involvement in the project evaluation. We strongly disagree.

For this reason, the coalition of groups sending this letter calls for you to insist that the concerns outlined in our February 2 letter to WisDOT be fully addressed in an Environmental Impact Statement. We ask that you consider the following factors as you weigh your decision:

- **Questionable Purpose & Need:** Forecasts used to justify the recommended expansion have consistently and grossly overestimated actual demand. For example, in the *Wisconsin State Airport System Plan 2020* (WisDOT; 2000) West Bend Municipal Airport was projected to support 90,900 operations (take-offs & landings) by the year 2000. According to FAA form 5010, *Airport Master Record*, West Bend Municipal Airport reported only 37,300 operations in 2004, a realization of only 41% of the most recent demand forecasts. Recently WisDOT has shifted their justification for this project from one based on demand to one based on safety to accommodate a desired (but as yet unrealized) increase in jet traffic at the airport. A re-evaluation and public dialogue of whether this newly determined economic development need should receive state and federal funding priority as part of the *State Airport System Plan* is needed. It should be noted that there is only *one* jet currently based at West Bend Municipal Airport.
- **Unprecedented Wetland Losses:** If this project goes through as planned, experts suggest it would represent the largest single-site concentration of wetland destruction in Wisconsin since the passage of the Clean Water Act in 1972. Proposed impacts include direct fill of 60 acres of high quality wetlands along the upper reaches of the Milwaukee River and serious degradation of at least 88 additional acres (topping off trees in 88 acres of adjacent lowland swamps, fragmentation of regionally important wildlife habitat, and the substantial alteration of a designated Primary Environmental Corridor).
- **Regional Flooding Concerns:** As the state's most densely developed region, cumulative losses of wetlands in Southeastern Wisconsin have contributed to a suite of regional water quality and flooding problems. Downstream communities (e.g. Mequon, Milwaukee) are investing hundreds of millions of dollars in flood mitigation and flood avoidance, using state stewardship funds, private funding, and regional service fees for sewerage infrastructure. Concentrated wetland losses of this magnitude upstream would significantly undermine the flood control investments being made by other downstream communities.
- **Fiscal Responsibility:** Expansion of the West Bend airport and the associated re-routing and widening of State Highway 33 will require a significant investment of state transportation funds, at a time when the state budget, and transportation funds in particular, are stretched tight. As you are well aware, WisDOT's highway program alone faces a projected shortfall of more than \$5 billion over the next fifteen years. Additionally, WisDOT's project expenditures are under very close scrutiny from the media in the wake of revelations of more than \$1 billion in highway cost overruns, as well as numerous instances where the department's ability to plan

projects and budget in a fiscally responsible manner have been called into question. This recent track record makes it especially important that any new projects are wise investments.

- **Significant Public Opposition:** This project is much more controversial than WisDOT and its consultants acknowledge. The proposed use of state and federal money to facilitate wetland losses of this magnitude, with so little justification, is unprecedented and has elevated this project to well beyond one of only local concern (see signatories).

**It is our belief that other project alternatives exist** – alternatives that would meet the economic development interests of the region and the safety needs of West Bend Municipal Airport, but at a significantly lower cost to the state and with significantly less impact on the adjacent and downstream environment. But to identify the alternative that truly addresses all of these concerns requires the disclosure, thorough analysis, and public participation that can only be obtained through the development of an Environmental Impact Statement designed to address the deficiencies in the existing Environmental Assessment.

We recognize that in rare instances, when public health and welfare are at stake and no alternatives exist, wetland impacts of this magnitude may be unavoidable. This is not such a case. **To proceed with a project that the State cannot afford, when the purpose and need is unsubstantiated and the ecological costs are severe would be fiscally and socially irresponsible.**

We know that promoting responsible economic growth that maintains the quality of Wisconsin's natural resources is among your administration's top priorities, and we trust that you are prepared to intervene when state-sponsored programs fail to strike this balance. Therefore, **we urge you to insist that WisDOT address interagency and citizen concerns and comply with federal and state environmental regulations by preparing a comprehensive Environmental Impact Statement for the proposed expansion of the West Bend Airport.**

We thank you for your attention to this important matter. Please direct questions and correspondence c/o Becky Abel, Executive Director, Wisconsin Wetlands Association, 222. S. Hamilton St., #1, Madison, WI 53703 608-250-9971/becky@wiscwetlands.org.

Sincerely,

Becky Abel  
*On behalf of...*

1000 Friends of Wisconsin  
Friends of Milwaukee's Rivers  
Milwaukee County Conservation Coalition  
River Alliance of Wisconsin  
Sierra Club Great Waters Group

Watershed Watchers / Taxpayers Against  
Airport Growth  
Wisconsin Wetlands Association  
Wisconsin Wildlife Federation

Enclosures: February 2 letter to WisDOT & DOT response (February 21)

cc: Pat Henderson, Legislative Director, Office of the Governor  
Secretary Busalacchi, WisDOT  
Secretary Hassett, WDNR  
Mayor Michael Miller, City of West Bend  
Philip Everson & Don Reed, Southeastern Wisconsin Regional Planning Commission  
Jill Badzinski, Editor, West Bend Daily News  
Patrick Marley & Don Behm, Milwaukee Journal Sentinel  
The Wheeler Report