

**Federal Aviation Administration**

**FINDING OF NO SIGNIFICANT IMPACT**

**for the**

**PROPOSED AIRPORT DEVELOPMENT**

**Environmental Assessment**

**(EAXX-021-12-ARP-1726672411)**

**at the**

**General Mitchell International Airport**

**Milwaukee, Wisconsin**

The Federal Aviation Administration (FAA) prepared this Finding of No Significant Impact (FONSI) for the decommissioning of Runway 1R/19L with conversion of the Runway 1R/19L south of Taxiway W into a parallel taxiway; the decommissioning of Runway 13/31 with removal of Taxiway G, U and N connectors; and removal of runway and taxiway pavement and electrical utilities project at the General Mitchell International Airport (MKE). In accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and based on the evaluation in the Condensed Environmental Assessment (EA), dated December 2, 2024, there are no significant impacts associated with the Proposed Action. Therefore, an Environmental Impact Statement (EIS) will not be prepared and a FONSI is being issued.

**1. Purpose and Need**

The General Mitchell International Airport (Airport) is located in the City of Milwaukee, Milwaukee County, Wisconsin approximately two miles west of Lake Michigan and approximately five miles south of downtown Milwaukee. The Airport is owned and operated by Milwaukee County. Presently, the Airport operates using a five-runway configuration, including two sets of parallel runways which include the existing parallel runways, Runway 7L/25R and Runway 7R/25L which are oriented in an east/west direction and Runway 1L/19R and Runway 1R/19L oriented in a north/south direction. Additionally, Runway 13/31 is oriented northwest/southeast.

The purpose of the proposed project is to right size the airfield, improve airfield safety, remove obsolete and underutilized pavements, and minimize operation and maintenance costs. The Airport completed a Master Plan Update in September of 2022 which identified that the Airport would be able to accommodate demand through the 2040 planning horizon using a 3-runway system, which would allow the Airport to remove underutilized and obsolete pavement to right size the airfield. The Airport also has non-standard taxiway intersections, and the removal of pavement would correct the non-standard conditions and improve airfield safety. To maintain Wisconsin Air National Guard access to the runway system, the taxiway network would be modified to include a partial parallel taxiway that would connect the existing Taxiway W to Taxiway S.

**2. Alternatives Considered**

The Condensed EA identified and evaluated reasonable alternatives which include:

- Proposed Action:

- The proposed action would decommission and remove Runway 1R/19L, decommission and remove Runway 13/31, and modify the supporting taxiway network. Taxiway network modifications include the conversion or construction of Taxiway CC and the removal of Taxiway G, Taxiway U, and partial removal of Taxiway N.
- The proposed action may also include the following associated components:
  - Flight Procedure Modifications - Due to the decommissioning of both Runway 1R/19L and Runway 13/31 flight procedures associated with the runways would be removed.
  - Pavement Removal - Pavement removal may consist of removing existing concrete and/or asphalt pavement, placement of on-site or off-site fill (as required), topsoil placement, and restoration to turf.
  - Intersection Adjustments – Runway 1R/19L, Runway 13/31, Taxiway G, Taxiway U, and Taxiway N intersect various taxiways and runways, and will be adjusted.
  - Partial Parallel Taxiway Construction – This includes two potential actions. The first, Runway 1R/19L between Taxiway W and Taxiway S will be converted to the proposed partial parallel taxiway (Taxiway CC).
  - Navigational Aids (NAVAIDs) and Airfield Lighting Removal - Runway lights, taxiway lights, guidance signs, REILs, PAPIs, and other associated electrical infrastructure would be removed. The removal of FAA owned NAVAIDS (REILs and PAPIs) would require additional FAA coordination for removal.
  - Airfield Lighting Replacement and Adjustments
  - Drainage Removals and Realignment
  - Temporary Construction Tasks including haul roads, staging areas and excess material sites.
- Other alternatives were considered, but each alternative was eliminated from further consideration for not meeting the Purpose and Need of the project. The alternatives that were considered, and subsequently eliminated, include the following:
  - Decommission and Remove One Runway, Runway 1R/19L:
    - The decommissioning and removal of only Runway 1R/19L would improve airfield safety, reduce operations and maintenance costs, and maintain airfield access. However, it does not meet the purpose and need of rightsizing the airfield by not establishing an optimized three-runway system.
  - Decommission and Remove One Runway, Runway 13/31:
    - The decommissioning and removal of only Runway 13/31 would improve airfield safety, reduce operations and maintenance costs, and maintain airfield access. However, it does not meet the purpose and need of rightsizing the airfield by not establishing an optimized three-runway system.
- Do Nothing: The no action alternative assumes that the current Airport conditions would remain unchanged without the Proposed Action improvements. This alternative does not meet the stated Purpose and Need and was eliminated from consideration.

### 3. Environmental Consequences and Mitigation

After careful analysis and consultation with various state and federal resource agencies, the Airport selected the Proposed Action as the preferred alternative. This alternative satisfies the Purpose and Need for the project while causing minimal environmental impacts. The Sponsor shall implement the following mitigation measures as a condition of environmental approval of the proposed project listed in this FONSI.

#### A. Air Quality:

Milwaukee County is designated a non-attainment zone for 8-hour ozone (moderate) and maintenance area for PM<sub>2.5</sub>. Since the proposed action does not qualify for an exemption to the General Conformity Rule and is not included on the presumed to conform list, the estimated emissions of ozone and PM<sub>2.5</sub> were compared to the US Environmental Protection Agency and Wisconsin Department of Natural Resources de minimis levels.

The proposed project is not anticipated to increase the capacity of the airport or significantly change the operational environment due to the minimal existing aircraft operations that utilize both runways. The proposed action would not substantially impact air quality and emissions estimates have been demonstrated to be below de minimis levels. Although the proposed project is not anticipated to substantially impact air quality, additional steps will be taken to reduce the potential for air quality impacts during construction. The temporary impacts from construction activities will not be significant.

#### B. Hazardous Materials, Solid Waste, and Pollution Prevention

A Phase I Environmental Site Assessment (ESA) was prepared for Runway 1R/19L and Runway 13/31 proposed project areas. The Phase I ESA identified one listing to be within the project area listed as a closed ERP site titled BRRTS#02-41-558334 Shell Pipeline at Gen Mitchell International Airport and was identified to have continuing obligations. The site is located within the intersection of Taxiway E and Taxiway U. The proposed project is anticipated to remove pavement within and around the footprint of the site, but it is not anticipated to conflict with the continuing obligations of the closed BRRTS site. Assuming that the proposed project is not disturbing soil, the WDNR R&R staff had no further concerns about the proposed project and no formal notification was needed. Once construction plans are finalized, the WDNR R&R staff should be notified for final review.

Currently, there is an ongoing investigation for per- and polyfluoroalkyl substances (PFAS) at the Airport under BRRTS#02-41-584547 General Mitchell International Airport PFAS. The investigation focused on the civilian airport operations. The 128<sup>th</sup> and former 440<sup>th</sup> military bases were investigated separately. The proposed project area has not been investigated or identified as an area of focus for the PFAS site investigation at this time. Although PFAS has not been identified in the proposed project areas, PFAS contamination has been detected in adjacent areas and at several locations throughout the Airport.

Although soil excavation and removal below the existing pavement and sub-base are not anticipated, if soil were to be excavated, there is a potential that the soil could be impacted by PFAS. WDNR R&R staff recommended that a contingency plan be added in the event soil would require removal from site or if contaminated soil is encountered. If it determined during design that soil disturbance and removal is needed, the WDNR R&R staff would be consulted to determine if a Materials Management Plan is needed.

If evidence of soil or groundwater contamination is suspected during construction activities, the work in the suspected area should be suspended and the Airport should be notified. The WDNR should also be notified and the contamination properly managed.

### C. Water Resources – Wetlands:

A wetland delineation was performed on September 11, 2023, which identified wetlands on the southern end of the project area. Presently, grading impacts to wetlands are not anticipated, but if it is determined during design that wetlands may be impacted, all wetland impacts and mitigation should be coordinated through the FAA, WDNR, and United States Army Corps of Engineers (USACE).

USACE indicated through preliminary coordination that initial plans did not show a large potential to impact wetlands/waterways and impacts may be avoidable. If final design determines that wetlands will be impacted, a preconstruction notification (PCN) may be needed if the impacts are greater than the thresholds listed under Category 2: Modification - Linear Transportation of the USACE St. Paul District's Transportation Regional General Permit dated December 13, 2023. All wetland impacts and wetland mitigation will be coordinated with the FAA, WDNR, and USACE, and any mitigation would take place through the WisDOT wetland mitigation bank.

### D. Floodplains

Much of the proposed project area is outside the 100-year flood area except for south of Taxiway S. This area includes the high-risk area, Zone AE, and the moderate-risk area Zone X with a 0.2% annual chance flood hazard. Presently, the proposed project is not anticipated to fill or construct pavement within the special floodplain hazard area. As design is refined, the proposed project may include minor grading (cut) or drainage improvements within the floodplain. All pavement construction activities are anticipated to be located north of Taxiway S, no new pavement is anticipated to be added south of Taxiway S.

Floodplain encroachment is not anticipated. Although not anticipated, any proposed temporary or permanent changes in the floodplain require coordination with the City of Milwaukee Zoning office. Due to the proximity of the project area to the floodplain, there is a potential for disturbance. If disturbance is identified through project planning, a notice of floodplain encroachment will be published.

### E. Surface Water

Wilson Park Creek is enclosed in underground culverts running along Runway 13/31. The proposed action is only anticipated to remove existing runway pavement, restore to turf, and keep existing drainage patterns. All removal activities would occur over the top of the enclosed stream. The proposed project activities are not anticipated to impact the culverts that enclose Wilson Park Creek.

Although not anticipated, if it is identified through project design the culverts enclosing Wilson Park Creek would be impacted, further coordination with the WDNR Transportation Liaison would be needed to identify the degree of impact. Additionally, if in-stream disturbance is anticipated there shall be no in-stream disturbance between March 1<sup>st</sup> to June 15<sup>th</sup> (inclusive) to minimize impacts to fish and other aquatic organism during sensitive time periods of spawning and migration.

### F. Water Quality

Short-term soil erosion and stormwater quality impacts could result from construction activities. Existing condition of the proposed project area is pavement surrounded by mowed grass, there are no structures. The proposed action would remove runway and taxiway pavement and restore to a mowed grass field.

The proposed action is not anticipated to alter the existing drainage patterns within the project area. If the construction of a partial parallel taxiway is necessary, it may alter the existing drainage patterns in the project area, but through the incorporation of existing culvert pipes, swales, and ditches, the construction of the taxiway is not anticipated to change existing drainage patterns outside of the project area. Construction activities would comply with the requirements of Chapters NR 151 Runoff Management and NR 216 Storm Water Discharge Permits of the Wisconsin Administrative Code.

Since the proposed project would consist of greater than one acre of land disturbance, it would need to adhere to the Wisconsin Pollutant Discharge Elimination System Transportation Construction General Permit (TGCP) for Storm Water Discharge. The proposed project would also require an Erosion Control Plan (ECP) that would include the best management practices that will be implemented during construction.

The proposed action would convert impermeable surfaces (pavement) to a permeable surface (turf). The construction of a partial parallel taxiway would not increase the amount of impermeable surface from existing. The decrease in impermeable surface would decrease stormwater runoff for the project area and increase natural infiltration. By implementing erosion control measures during construction, impacts to water quality would be mitigated.

#### G. Construction Impacts

Construction impacts may cause temporary environmental impacts associated with noise from construction equipment, haul roads and staging areas, potential impacts on water quality from run-off and soil erosion from exposed surfaces, and air quality from dust emissions due to equipment operation.

Noise generated from construction equipment is not expected to be greater than the noise from aviation operations and the adverse effects related to construction noise are anticipated to be localized, temporary, and transient in nature. To reduce the potential impact from construction noise, all motorized equipment will be operated in compliance with all applicable local, state, and federal laws and regulations relating to permissible noise levels within and adjacent to the construction site. In addition, all motorized construction equipment would be required to have mufflers and exhaust systems constructed in accordance with equipment manufacturer's specifications or systems of equivalent noise reducing capacity, maintained in good operating condition.

Additional temporary construction impacts include the use of airport haul roads and staging areas. To mitigate any impacts, the project will use existing haul roads and staging areas that are currently designated for use by contractors during construction operations. No additional impacts are anticipated.

Construction activities may also impact water quality from soil erosion from exposed surfaces. Impacts to water quality will be mitigated as described in Section G of this document. If surface water is contaminated with oil, bitumen, harmful or objectionable chemicals, sewage or other pollutants, the water will be disposed of in an acceptable manner to avoid affecting nearby waters and lands. The contractor should not discharge pollutants into any water course or water storage area. If a spill were to occur, the contractor should report any spills to the Airport for proper handling and management.

Construction activities may temporarily impact air quality due to equipment exhaust emissions and soil disturbance. These impacts are anticipated to be localized and below the de minimis standards. Additional

mitigation will include implementing dust control measures such as watering to minimize fugitive dust migration off Airport.

By implementing mitigation measures described in this section, no significant impacts from construction are anticipated with the proposed action.

The following permits will/may be required:

- WDNR – A Notice of Intent will be submitted to initiate the Transportation Construction General Permit (TCGP) which will also require an Erosion Control Plan (ECP) and an Erosion Control Implementation Plan (ECIP).
- Wetland impacts are not anticipated, but a Wetland Impact Tracking Form (WITF) and necessary information will be provided to the WDNR for any wetland compensation.
- Wetland impacts are not anticipated, but a USACE Transportation Regional General Permit may be necessary if final design indicates disturbance of wetlands.
- Coordination with USACE may be required if there are wetland impacts. A preconstruction notification (PCN) may be needed if the impacts are greater than the thresholds listed under Category 2: Modification - Linear Transportation of the USACE - St. Paul District's Transportation Regional General Permit dated 12/13/2023.
- WDNR Final Concurrence will be granted after further review of refined project plans, Erosion Control Plan, Wetland Impact Tracking Form, Special Provisions, NOI for the TCGP, and additional coordination if necessary.
- WDNR Remediation and Redevelopment will require coordination if the final design requires soil removal to determine if a Materials Management Plan is required to manage PFAS impacted material.
- WDNR Remediation and Redevelopment – Due to the continuing obligations associated with BRRTS site #02-41-558334, notification is required a minimum of 90-days prior to project construction.
- The project is not anticipated to have grading within the floodplain. Proposed temporary or permanent changes in regulated floodplain areas require coordination with the City of Milwaukee Zoning Office. WDNR shall be included on all floodplain coordination.

#### **4. Public Review and Comment**

Public involvement is a vital component of the National Environmental Policy Act (NEPA) process. A notice of availability and public workshop for the Draft EA was published in the Milwaukee Journal Sentinel on September 23, 2024, El Conquistador Latino Newspaper on September 26, 2024, and made available on the airport website in both English and Spanish. Copies of the Preliminary EA were made available at the Milwaukee Public Library, Cudahy Family Library, St. Francis Public Library, and on the project website. A public workshop regarding the proposed project was held on October 23, 2024 at the Milwaukee Mitchell International Airport Terminal Building. No comments were received from the public and several comments were received from Agencies during the public comment period. Comments with responses are included in Appendix 8 of the Final EA and incorporated into the EA as applicable.

#### **5. Finding**

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action is consistent with existing national environmental policies and objectives as set forth in Section 101 of the National Environmental Policy Act of 1969 (NEPA) and other applicable

environmental requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA. Having met all relevant requirements for environmental considerations and consultation, the proposed development/actions are authorized to be undertaken at such time as other requirements have been met.

These decisions are taken pursuant to 49 U.S.C. 40101 et. seq., and constitute an order of the Administrator which are subject to review by the courts of appeals of the United States in accordance with the provisions of Section 1006 of the Federal Aviation Act of 1958, as amended, 49 U.S.C. 46110.

---

FAA-CHI-ADO  
Deb Bartell, Manager  
Federal Aviation Administration

---

Date