October 9, 2025

Staff Analysis of Proposed Amendment to the *Dane County Water Quality Plan* **Revising the Sewer Service Area Boundary and Environmental Corridors in the Belleville Urban Service Area** ***"Badger Trails"***

History of the Belleville Urban Service Area

The Belleville Urban Service Area (USA) was formed at the time of the adoption of the first *Dane County Water Quality Plan*. The first amendment to the Belleville USA occurred in 1985 when 52 acres of Environmental Corridor were added. There has been a total of 5 amendments to this urban service area since its creation, all initiated by the Village of Belleville. In total, amendments to the Belleville USA have resulted in a net addition of 170 developable acres and 174 acres of Environmental Corridor. The most recent amendment of the service area by the Village of Belleville occurred in 2008, adding approximately 6 developable acres.

Planning in Belleville

The Village of Belleville updated their comprehensive plan in June of 2021. The Comprehensive Plan is substantially consistent with the adopted 2050 Regional Development Framework (Framework). The requested amendment areas are planned for and contiguous to compatible uses as envisioned in the Framework and the Village's long-range plans.

Existing Conditions

Land Use

The Village of Belleville is requesting an amendment to the Belleville USA in the southern portion of the Village. The amendment area is east of CTH-CC and south of West School Street. The requested amendment area totals approximately 58 acres. It is a planned residential subdivision. Most land surrounding the amendment area is agricultural and rural residential. Refer to **Table 1** for existing and planned land uses.

Surrounding Planned Land Uses:

- **North:** Existing Residential
- **East:** Existing Residential, Additional Residential Development
- **South and West**: Rural Residential and Agriculture

Table 1
Existing and Planned Land Use[1]

	Amendment Area		Existing USA		Total Development
Land Use Category	**Existing Land Use Acres (see Map 3)**	**Proposed Land Use Acres (see Map 4)**	**Existing Land Use Acres (see Map 3)**	**Proposed Land Use Acres (see Map 4)**	**Proposed Land Use Acres (see Map 4)**
Agriculture	58.3		7.9		0.0
Residential		33.3		3.6	36.9
Street Rights-of-Way		12.0		1.4	13.4
Parks and Recreation		4.9			4.9
Stormwater Management		6.0			6.0
Other Open Land		2.1		2.9	5.0
TOTAL	**58.3**	**58.3**	**7.9**	**7.9**	**66.2**

Cultural and Historic Sites

The Wisconsin Historical Society (WHS) has been contacted regarding the presence of any known archaeological sites or cemeteries within the amendment areas. There are no previously recorded archaeological inventories for this area. However, given the proximity to wetland and the surrounding terrain, WHS recommends a phase one archaeological survey prior to any ground disturbing activities.

Natural Resources

The amendment area is within the Ross Crossing Creek-Sugar River (HUC 12: 070900040502) subwatershed (see **Map 5**). There is one delineated wetland within the amendment area and a larger wetland complex to the south and east which is hydrologically connected to Ross Crossing Creek. Surface runoff from the amendment area drains to Ross Crossing Creek and

[1] Acreages listed in application materials may vary from acreages calculated through mapping in GIS by staff depending upon applicant data sources and mapping methods.

Sugar River, which are both designated as an Exceptional Resource Water (ERW), under the state's antidegradation rules (see NR 102 and NR 207). ERWs are not significantly impacted by human activities and provide valuable fisheries or unique habitat features. Both waterways and the associated wetlands are considered by Wisconsin DNR to be Areas of Special Natural Resource Interest (ASNRI) which indicates special ecological value of the resource and is intended as a basis for management decisions.

The amendment area is not within a drainage district. Wastewater from the amendment area will be treated at the Belleville Wastewater Treatment Facility. The treated effluent is discharged to Sugar River.

Wetlands

WDNR's Wisconsin Wetland Inventory (WWI) shows one emergent / wet meadow wetland within the amendment area. A wetland delineation (link to report) was conducted by GEOTHINK, LLC in April 2025 within the northwestern portion of the amendment area and the existing urban service area to the north. The site investigation and field delineation determined there was one wetland within the amendment area (see **Map 11**). The Northwest Wetland is described as a depressional meadow with scattered trees and shrubs, with vegetation dominated by reed canary grass (*Phalaris arundinacea*).

The delineated wetland, with a minimum 75' vegetated buffer, are required to be designated as Environmental Corridor per the adopted Policies and Criteria for Environmental Corridors (link to document), as part of the *Dane County Water Quality Plan*. A wetland confirmation from DNR is required prior to finalizing environmental corridors, as the wetland scientist completing the delineation is not an assured delineator.

In addition to the delineated wetlands within the amendment area, there are also other wetlands near the amendment area. According to the WWI, the wetland area directly to the south is classified as palustrine persistent emergent / wet meadow, broad-leaved deciduous scrub/shrub, and broad-leaved deciduous forest. This wetland complex is associated with Ross Crossing Creek.

Ross Crossing Creek

The runoff from the amendment area drains to the south and is within the Ross Crossing Creek- Sugar River subwatershed. Ross Crossing Creek (WBIC 885600 / WATERSID 13632) is 5-mile long tributary to the Sugar River and flows north and east before entering the Sugar River between Belleville and Dayton. Directly south and southeast of the amendment area, two unnamed tributaries feed into the creek. Ross Crossing is designated as an Exceptional Resource Water (ERW). The entire creek was listed as impaired in 2018 for total phosphorus and was last assessed during the 2024 listing cycle. Ross Crossing Creek is considered a

cool-cold headwater and coldwater natural community. It currently supports a warm water forage fishery and has an attainable use as a coldwater stream.

There are no active DNR or USGS monitoring stations along Ross Crossing Creek.

Sugar River

Wastewater effluent from the Village of Belleville is discharged into Sugar River (WBIC 875300 / WATERSID 5542005). This river originates in the Town of Springdale, Dane County and flows southeast into Illinois. The segment of the Sugar River from the dam at Belleville down to the dam at Albany is 22 miles long and was listed as impaired in 2020 for total phosphorus. It was last assessed during the 2024 listing cycle. Sugar River has a cool-warm mainstem, cool-cold mainstem, and coldwater natural community over different segments of the river. Downstream of the amendment area, it has a cool-warm mainstem natural community. It is designated a Class II trout stream from mile-56 to mile-82. Sugar River is also designated as an Exceptional Resource Water (ERW).

There are no active DNR or USGS monitoring stations along the segment of Sugar River north of the dam at Albany.

Springs

Springs represent groundwater discharge visible to the casual observer. The Wisconsin Geological and Natural History Survey (WGNHS) maintains an inventory of springs in Dane County and throughout the state. From 2014 to 2017, the WGNHS surveyed springs statewide that were expected to have flow rates of at least 0.25 cubic feet per second (cfs). There are no known springs in or near the proposed amendment area.

Groundwater

In 2012, the WGNHS published a report, *Groundwater Recharge in Dane County, Wisconsin, Estimated by a GIS-Based Water-Balance Model* (link to report), estimating the existing groundwater recharge rates in Dane County based on the soil water balance method. The study estimates that the existing groundwater recharge rate in the proposed amendment area ranges from approximately 9 to 10 inches per year.

Endangered Resources

The WDNR Bureau of Endangered Resources maintains a database representing the known occurrences of rare plants, animals, and natural communities that have been recorded in the Wisconsin Natural Heritage Inventory (link to website). A screening review of this database conducted by CARPC staff for species designated as endangered, threatened, or of special concern identified one threatened fish species; several species of special concern: two plant, one turtle, one mussel, and one bird; and one natural community within a 1 to 2-mile radius of the amendment area. Therefore, it is recommended that a formal Endangered Species

Resources Review be conducted by the WDNR or one of their certified reviewers for potential impacts to endangered resources, and habitat protection measures to be implemented if species are found.

The amendment area was reviewed for the High Potential Zone (species likely present) for the federally endangered Rusty Patched Bumble Bee (link to web map). None of the amendment area is within the High Potential Zone.

Soils and Geology

The amendment area is located within the Sugar River Valley Land Type Association of Wisconsin. The Association classifies the surficial geology of this area as undulating valley floor with floodplains, terraces, beaches, lake plains, and scattered bedrock knolls.

Surface elevations within the amendment area range from around 859 feet to 872 feet. There are no areas of steep (> 12%) and very steep (>20%) slopes associated within the amendment area (see **Map 6**).

According to the General Soil Map of Green County, the soils in the amendment area are in Dickinson-Meridian association. These soils are deep, nearly level to sloping soils that have a loamy subsoil; underlain by outwash sand and or sand and gravel. **Table 2** shows detailed classifications for soils in the amendment area (see **Map 7**) and **Table 3** shows important soil characteristics for the amendment area.

There are no hydric soils within the amendment area (see **Map 7**), which are good indicators of existing and former (drained) wetlands. According to the Soil Survey Geographic data for Green County developed by the NRCS (link to web soil survey), the Thackery soils (the ThA map unit) are not hydric, but they do have a seasonal (April to June) zone of water saturation within 5 feet of the ground surface. The ThA soils are moderately well drained and therefore do not pose a limitation for buildings with basements.

Table 2
Soils Classification

Soil	% of Area	General Characteristics
Festina Silt Loam; 312B2	81.2	Very deep, well drained soils formed in silty alluvium over stratified slackwater deposits. Soils have medium fertility, moderate to moderately rapid permeability, and a slight to moderate hazard of erosion. Poses moderate limitations for development due to shrink-swell potential and depth to saturated zone.

Ockley Silt Loam; OkB2	8.8	Very deep, well drained soils that are deep or very deep to calcareous, stratified sandy and gravelly outwash. Soils have medium fertility, moderate to very rapid permeability, and a moderate hazard of erosion. Poses moderate limitations for development due to shrink-swell potential.
Oshtemo Loamy Sand; OsC2	1.4	Very deep, well drained soils formed in stratified loamy and sandy deposits on outwash plains, valley trains, moraines, and beach ridges. Soils have low fertility, moderately rapid to very rapid permeability, and a low to moderate hazard of erosion. Poses moderate limitations for development due to slope.
Thackery Silt Loam; ThA	1.2	Very deep, moderately well drained soils formed in loamy material and the underlying calcareous outwash on outwash plains and stream terraces. Soils have medium fertility, moderate to rapid or very rapid permeability, and slight to moderate hazard of erosion. Poses moderate limitations for development due to depth to saturated zone.

Source: Soil Survey Geographic data for Dane County developed by the USDA Natural Resources Conservation Service

Table 3
Soils Characteristics

Characteristic	**Soil Map Symbols** (see **Map 7**)	**% of Area**
Prime Agricultural Soils	312B2, OkB2	96.4
Hydric Soils (Indicates Potential / Restorable Wetlands)	None	0
Poorly Drained Soils with Seasonal High Water Table (< 5')	None	0
Soils Associated with Steep Slopes (> 12%)	None	0
Soils Associated with Shallow Bedrock (< 5')	None	0
Best Potential for Infiltration in Subsoils	OkB2, OsC2, ThA	12.4

Source: Soil Survey Geographic data for Dane County developed by the USDA Natural Resources Conservation Service

According to WGNHS data, bedrock within the amendment area is in the Ancell Group. Bedrock in the Ancell Group is medium-grained, mature quartz sandstone and consists of two formations including the Glenwood and St. Peter Formations. Thickness is about 100 feet. According to WGNHS data, the depth to bedrock in the amendment area ranges from 26 to 77 feet, with the shallowest depths generally being in the northwestern portion of the

amendment area, and the deepest depths being in the southeastern portion of the amendment area (see **Map 8**).

As is common throughout much of the upper Midwest, karst features such as enlarged bedrock fractures are prevalent in the local dolomite uplands. Karst features including vertical fractures and conduits provide primary pathways for groundwater movement and can dramatically increase groundwater susceptibility when present. The location of karst features is difficult to predict, and the thickness and type of the overlying soil greatly affects how much water drains into them. Where clay soils are thick, infiltration rates are likely to be very low. However, where bedrock fractures are near the surface infiltration rates can be very high. This can also pose a concern for potential groundwater contamination if improperly managed. *WDNR Technical Standard 1001 – Wet Detention Pond* (2007) and *WDNR Technical Standard 1002 – Site Evaluation for Stormwater Infiltration* (2022) require field verification for areas of the development site considered suitable for stormwater management. This includes a site assessment for karst features in this area. If shallow karst features are found, adequate protection measures are required to address any potential for groundwater contamination.

Per Dane County ordinance, infiltration practices receiving runoff from source areas that contain impervious surfaces must be located to allow a separation distance of at least 5 feet between the infiltration system and the elevation of seasonal high groundwater, or the top of bedrock, along with certain soil filtering characteristics. However, there is no minimum separation distance for roofs draining to surface infiltration practices. Soil test pits are required as part of the stormwater management plan to ensure that infiltration practices are sited in locations that will not adversely affect groundwater quality.

Contamination

The application includes documentation of a comprehensive review of databases for available information on contamination and other environmental hazards on and surrounding the amendment area. Many records were found, but there were no documented sites within the amendment area. CARPC staff reviewed the DNR Remediation and Redevelopment Tracking System database (link to database) and Remediation and Redevelopment (RR) Sites Map (link to map viewer) for records of contamination within the amendment area. No records of investigation or cleanup activities were found.

Proposed Urban Services

Parks and Open Space

The proposed development includes five outlots dedicated to park, nature preserve (containing wetlands), buffer, or stormwater management and a recreational path along the southern and eastern boundaries of the development. These areas total 13 acres within the

amendment area (see **Map 2**). All stormwater areas, parks, and open space areas are proposed for placement in Environmental Corridors. The Badger State Trails runs along the western edge of the amendment area.

Wastewater

Overview

Sanitary sewer service will be provided to the proposed development within the amendment area by connection to the Village of Belleville sanitary sewer collection and wastewater treatment system. The amendment area will be served by gravity sewer and connect to the existing 8-inch sewer on Green View Drive (see **Map 9a**). Wastewater will gravity drain to the Green View lift station located south of the intersection of Blaser Drive and Sugar Avenue. The lift station will pump flows to existing 8-inch sewer along East Avenue which will convey flows north and ultimately discharge to the Village of Belleville Wastewater Treatment Facility.

Collection System

The proposed development within the amendment area consists of approximately 203 single-family residential units contributing to wastewater flows. The Village estimates that the amendment area will generate an annual average of approximately 46,690 gallons per day (gpd) of wastewater, or 32 gallons per minute (gpm). This assumes 2.3 persons per single-family dwelling unit and an average wastewater generation rate of 100 gallons per capita per day (gpcd) for residential land uses. The Village estimates that the amendment area will generate a peak daily flow rate of approximately 186,760 gpd (0.187 mgd), or 130 gpm (0.29 cfs), utilizing a peaking factor of 4.0 for residential land uses.

The proposed 8-inch sanitary sewers within the amendment area are anticipated to have sufficient capacity for estimated peak flows based on minimum slope requirements per NR 110. The downstream 8-inch sewer in Green View Drive currently receives flows from 133 housing units which generate an average daily flow of 21 gpm (0.05 cfs) and a peak daily flow of 85 gpm (0.19 cfs), under the same assumptions applied to the amendment area. Including flows from the proposed development, the Green View Drive sewer will receive a total peak daily flow of 215 gpm (0.48 cfs) and will remain below its capacity of 296 gpm. Flows from the lift station and 31 additional housing units will discharge to the 8-inch sewer on East Avenue. The Village estimates that the East Avenue sewer currently receives an average daily flow of average daily flows of 26 gpm (0.06 cfs) and peak daily flows of 105 gpm (0.23 cfs). Including the peak daily flow from the amendment area, the East Avenue sewer will receive flows of 234 gpm (0.52 cfs) and will remain below its capacity of 296 gpm.

However, the Green View lift station currently operates at a capacity of 200 gpm and will require system upgrades prior to full development to pump peak flows from Green View Drive to the East Avenue sewer. The lift station was designed to accommodate a larger ultimate

sewershed; the capacity can be increased from 200 gpm to 350 gpm by upgrading the 9.375-inch impellers to 10.9375-inch impellers, as stated in the *Green View Place Lift Station Design Report* (MSA, 2003). As described in the Village's application, the impellers must be upgraded to ensure the lift station has sufficient capacity to convey the additional flows from the proposed development. This work will be completed as needed based on anticipated flows for each phase of development.

The lift station will have an ultimate design capacity of 350 gpm following the impeller upgrade. If additional future development occurs or existing flows increase necessitating the lift station to operate at full capacity, this would exceed the 296-gpm capacity of the downstream 8-inch sewer on East Avenue. The design report described a few alternatives to resolve the capacity constraint, including the following: 1) upsize the entire segment of 8-inch sewer in East Avenue, 2) extend the force main to bypass the 8-inch sewer and connect to downstream 10-inch sewer in East Avenue, or 3) constructing a new force main that will pump flows to an existing 15-inch sewer near the Belleville WWTF.

Following the propeller upgrades within the lift station and based on the estimated wastewater loading, the Village has shown that there is sufficient planned wastewater collection system capacity to serve the proposed amendment area. Future development within the sewershed of the Green View Drive lift station will require further assessment of flows and possible additional conveyance capacity improvements downstream of the lift station.

Wastewater Treatment Facility

The Village of Belleville will provide wastewater treatment for the amendment area. The Belleville Wastewater Treatment Facility (WWTF) was upgraded in 2008, followed by additional modifications in 2020. The facility is located on Remy Road in the Village of Belleville, and currently discharges treated effluent to the Sugar River in Dane County, near the treatment facility, within the Ross Crossing Creek-Sugar River subwatershed (Sugar-Pecatonica River Basin). The rated monthly design flow capacity of the facility, according to annual reporting records, is 0.346 million gallons per day (MGD). In the year 2024, the facility received an average monthly influent hydraulic loading of 0.251 MGD (73% of the 0.346 MGD design capacity), including infiltration and inflow, according to the 2024 Compliance Maintenance Annual Report (CMAR) (link to 2024 CMAR). The Village reported that with the addition of the amendment area (46,690 gpd) at full build-out, the Belleville WWTF will receive average daily flows of approximately 298,000 gpd and will remain below the design average daily flow capacity of 346,000 gpd.

The Village of Belleville has an approved Water Quality Trading plan in place for phosphorus compliance, as approved by WDNR on September 6, 2024. Accounting for the WQT plan, the

Village did not have issues meeting WPDES permit (modified January 2025, expires June 2026) limits for the quality of effluent discharged to the Sugar River, according to their 2024 CMAR.

Permit limits are specific to the Sugar River outfall. Below is a summary of the major effluents reported on in the 2024 CMAR:

- The biochemical oxygen demand (BOD) effluent quality for 2024 was below the monthly average limit, with a monthly average of 1.5 mg/L (5% of the limit) and a maximum concentration of 3 mg/L (10% of the limit) for the months of January, February, March, and December.

- The total suspended solids (TSS) effluent quality for 2024 was below the monthly average limit, with a monthly average of 2.9 mg/L (10% of the limit) and a maximum concentration of 4 mg/L (13% of the limit) for the months of February and March.

- The ammonia (NH3) effluent quality for 2024 was below the monthly average limits (limits vary by month), with a monthly average of 0.049 mg/L (0 – 3% of the limit) and a maximum concentration of 0.496 mg/L (3% of the limit) for the month of December.

- The phosphorus (P) effluent quality for 2024 was below the monthly average limit, with a monthly average of 0.19 mg/L (24% of the limit) and a maximum concentration of 0.36 mg/L (45% of the limit) for the month of November.

The Belleville WWTF is not able to meet the final WQBELs, and so the use of Water Quality Trading (WQT) has been authorized as a tool to demonstrate compliance. In this WQT plan (WQT-2024-0022), the Village will establish legally binding 10-year agreements with three private landowners to implement a variety of practices including streambank stabilization, habitat improvements, improved nutrient management practices, and cover crop practices on agricultural lands to generate approximately 200 pounds of phosphorus credits per year during the WPDES permit term.

Water System

Overview

Water will be provided to the amendment area by connection to the Village's municipal water system. The Belleville Municipal Water and Sewer Utility provides municipal water through a public water distribution system which includes approximately 117,000 lineal feet of water main and three active high-capacity groundwater wells. The active wells are at depths ranging from approximately 325 to 780 feet with an average capacity of 275 to 1,000 gallons per minute (gpm). In total, the gross capacity of the municipal wells is approximately 1,780 gpm, or 2.6 million gallons per day (MGD). The firm capacity (with the largest well assumed to

be out of service) is approximately 780 gpm, or 1.1 MGD. The Village has one standpipe with a capacity of 300,000 gallons.

Water supply within the amendment area will be provided by 8-inch mains connecting to existing 8-inch water main north of the intersection of South Park Street and Sugar Avenue, and at the westerly end of Green View Drive (see **Map 9a**). Water main will be extended west from each connection and then internally looped within the amendment area. Additionally, water main will be extended towards the northern and western boundary of the amendment area to facilitate construction of future street extensions.

System Evaluation

According to the 2024 Annual Report to the Public Service Commission of Wisconsin (link to 2024 Annual Report), the Village pumped an average of 123 gpm, or 0.18 MGD, in 2024, which is approximately 16% of its firm pumping capacity. In 2024, the maximum amount pumped in any one day was 633 gpm, or 0.91 MGD.

Water losses in the Village's distribution system were an average of 570 gpd, or 0.0006 MGD, in 2024, which accounted for 0% of the net water supplied. All water losses can be attributed to reported leaks. In 2024, there were 2 main breaks and 1 service break which were repaired. Water losses in the Village's distribution system were 5% in 2023 and 16% in 2022. The Wisconsin Administrative Code PSC 185.85(4)(b) requires a utility with more than 1,000 customers to submit a water loss control plan to the Public Service Commission (PSC) if the utility reports its percentage of water losses exceeds 15%.

The proposed development consists of 203 single-family dwelling units contributing to water demand. The Village anticipates the annual average daily water demand for the amendment area to be approximately 46,690 gallons per day, or 32.4 gpm. This assumes 467 persons in the residential units using an average daily demand of approximately 100 gallons per day (gpd), based on the Village's application. The estimated peak daily demand is 93,380 gpd, or 65 gpm, based on a peak daily demand factor (average daily to peak daily) of 2 for residential land uses. The estimated peak hourly demand is approximately 7,783 gallons/hour, or 130 gpm, based on a peak hourly demand factor (average daily to peak hourly) of 4 for residential land uses, based on the Village's application. Including the projected demand from the amendment area, the total peak daily demand on the water system (633 gpm existing, based on 2024 records) is anticipated to be 698 gpm. The peak hourly demand is anticipated to be 1,396 gpm. This is within the gross capacity of the system with all three wells running but does exceed the firm capacity. If the largest well is down, water from storage will be required to meet the peak hourly demands on the system (note: this is already the case without adding the additional demand from the amendment area). Nonetheless, it is anticipated that the existing water supply system will support the additional

demand from the proposed amendment area. The estimated average daily water demand from the amendment area represents an increase of approximately 26% of the current demands on the system.

It is anticipated that the existing water supply system will support the additional demand from the proposed development within the amendment area.

Stormwater Management System

Overview

The amendment area is within the Ross Crossing Creek-Sugar River (HUC 12: 070900040502) subwatershed (see **Map 5**). This area currently consists almost entirely of agricultural row crops (see **Map 2** and **3**). The amendment area is relatively flat but generally sloping from northwest to southeast (see **Map 6**). There is an offsite watershed which drains through the wetland on the northern edge of the amendment area and through the site via a natural drainageway. All runoff leaves the site along the southern and eastern edges and enters a large wetland complex associated with Ross Crossing Creek, which is a tributary to Sugar River approximately 3,400 feet to the east (see **Figure 1**).

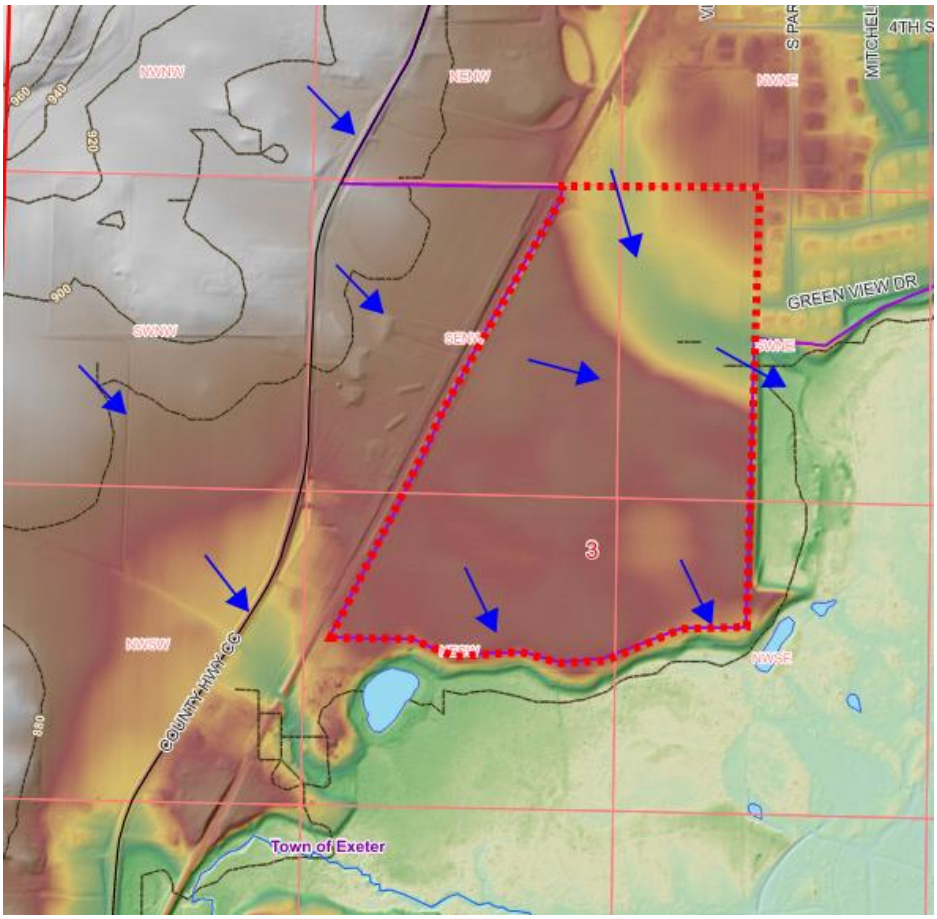


Figure 1. Topographical Map (DNR Elevation Layer, Green County GIS. Accessed: 2025)

Proposed Stormwater Management Plan

According to the Village's application, new development within the amendment areas will meet or *exceed* current stormwater regulations for peak rate control and attenuation, water quality (total suspended sediment, or TSS, reduction), volume control (infiltration), and temperature control. Oil and grease control is not required given the level and type of development proposed. Pretreatment of stormwater runoff for total suspended solids (TSS) and peak discharge rate attenuation is required prior to entering wetlands in accordance with NR 151 regulations.

As discussed previously under the Natural Resources section, Ross Crossing Creek, Sugar River and the associated wetlands are all designated Areas of Special Natural Resource Interest (ASNRI). Ross Crossing Creek and Sugar River are both Exceptional Resource Waters (ERWs). As such, consideration of enhanced stormwater controls is appropriate as these water resources are vulnerable to impacts from proposed development if such impacts are not mitigated through appropriate stormwater controls. As such, the Village is proposing the implementation of stormwater controls that *exceed* state and local standards for runoff volumes, water temperature, and groundwater recharge. Best management practices will be implemented to pursue the following key aspects: reduce the temperature of runoff leaving the site before entering the wetlands; provide post-development infiltration (stay-on) volume to maintain 100% of the predevelopment infiltration (stay-on) volume for the average annual rainfall period; and control the volume of stormwater runoff leaving the developed site to match the volume in predevelopment conditions for all storm events through the 200-year, 24-hour design storm. This proactive approach to stormwater management will help to mitigate the impacts of development on downstream properties and water resources.

A detailed stormwater management plan was not available at the time of this amendment proposal. However, the general intent is to manage stormwater for the entire development area (comprised of the amendment area and an area within the existing Urban Service Area) as well as the offsite watershed which flows through the site, through multiple plat-level stormwater basins. The concept provided in the application includes two primary stormwater management areas along the eastern edge of the plat (see **Map 9B).** This is expected to handle the majority of necessary stormwater controls, however the concept of decentralized green infrastructure has been discussed with the Village and may be pursued to achieve the higher stormwater standards proposed. Plat-wide or regional stormwater facilities will be placed in outlots dedicated to the public and will be owned and managed by the Village, while any stormwater facilities privately owned and managed will be subject to a stormwater maintenance agreement to be recorded with the Register of Deeds.

Temporary stormwater management and erosion control using appropriate best management practices during construction will also be required, including appropriate

phasing of ground disturbing activities to limit the amount of exposed soil. Depending on the extent of construction, a particular emphasis on limiting offsite transport of sediment from the construction area will be important to reduce any transport of sediment or nutrients from the existing site to the wetlands.

NR 151.124(4)(a)2. and 811.12(5)(d) of the Wisc. Admin. Code includes separation requirements for potential contamination sources, including a 400-foot setback for infiltration basins from public wells and up to a 100-foot setback from private wells for certain stormwater facilities. There are two private wells within or immediately adjacent to the amendment area, according to the Wisconsin DNR Well Inventory Viewer database (link). The final design of stormwater facilities will need to account for private (non-community) wells associated with the existing private wells and maintain proper setbacks in accordance with NR 812 regulations. Existing onsite private wells will need to be abandoned and sealed in accordance with applicable DNR and local requirements.

A detailed stormwater management plan review and approval by state, local, and regional agencies is required prior to beginning any development construction. The plan will be required to meet all stormwater management and performance standards of the Village of Belleville, Dane County, and WDNR current at the time of development, as well any performance standards made a condition of DNR approval of this amendment request.

Performance Standards

The Village of Belleville stormwater management and performance standards are contained within Chapter 450 of the Village of Belleville Code of Ordinances. Dane County stormwater standards are detailed within Dane County Code of Ordinances, Chapter 14. WDNR stormwater standards are within Administrative Code Chapters NR 151 and NR 216. Development within the amendment area will be required to follow the more protective requirements contained within the respective standards.

The Village proposes stormwater management performance measures for the amendment area to meet, or exceed, applicable stormwater standards currently required by the State of Wisconsin, Dane County, and Village of Belleville, and include:

1. Post-development peak runoff rate control for the 1-, 2-, 10-, 100-, and 200-year, 24-hour design storms (using NRCS MSE4 storm distributions) to match predevelopment peak runoff rates.

2. Sediment control for the average annual rainfall period to reduce total suspended solids leaving the post-development site by at least 80%, as compared to no runoff management controls, with sediment control pretreatment occurring prior to

infiltration for runoff from parking lots and new road construction within commercial, industrial, and institutional land uses.

3. Post-development infiltration (stay-on) volume control to maintain at least 90% of the predevelopment infiltration (stay-on) volume for the average annual rainfall period, without exception for sites determined to be within a closed basin watershed.

4. Maintain predevelopment groundwater annual recharge rates of approximately 9 to 10 inches per year, as estimated in *Groundwater Recharge in Dane County, Wisconsin Estimated by a GIS-Based Water Balance Model* (Wisconsin Geological and Natural History Survey, 2012), or by site-specific analysis, as an elective alternative to meeting the 90% stay-on requirement if more than two percent (2%) of the site is required to be used as effective infiltration area, if allowed by ordinance.

5. Thermal control to reduce the temperature of stormwater runoff from development sites within thermally sensitive watersheds.

6. Oil and grease control to treat the first one-half inch of runoff using the best available technology for commercial, institutional, and any other land uses where the potential for pollution by oil or grease exists.

Impacts and Effects of Proposal

Environmental Corridors

The proposed amendment area includes a total of approximately 13 acres of Environmental Corridor (see **Map 12**). This will include the delineated wetland with associated buffer, park, open space, and proposed stormwater management areas in accordance with the Environmental Corridor Policies and Criteria (link to document) adopted in the *Dane County Water Quality Plan*. The 100' vegetated buffer of the wetland complex associated with Ross Crossing Creek is proposed to be designated as environmental corridor. A small amount of what is proposed as Environmental Corridor also coincides with mapped Voluntary Environmental Corridor, as described below.

Estimated Environmental Corridors are required to be included in Environmental Corridors when those areas are added to the urban service area. Protection Areas include natural resource features such as the 1% annual chance floodplain, waterbodies, streams and wetlands, plus their required vegetative buffers, riparian steep slopes, existing public lands, parks, and conservancy areas, and existing stormwater management facilities. These areas are mapped based on regionally available information, such as the Wisconsin Wetland Inventory data.

The proposed amendment area includes 7 acres mapped as Voluntary Environmental Corridor, including potentially restorable wetlands, of which 1.7 acres are proposed to be designated as Environmental Corridor with this amendment (see **Map 12**). Voluntary Environmental Corridors are natural resources that are not legally protected from development, but still provide important benefits to the region, and are advised to be considered for inclusion in Environmental Corridors, above the minimum requirements. This concept is described more in the 2050 Regional Development Framework (Framework) and is aimed at achieving the goal of conserving water resources and natural areas. The Voluntary Environmental Corridor recommendations include natural resource features such as the 0.2% annual chance floodplain, potentially restorable wetlands, internally drained areas, hydric soils, current/potential Ice Age Trail Corridor, and Natural Resource Area boundaries identified in the Dane County Parks and Open Space Plan.

Meeting Projected Demand

Preliminary Department of Administration (DOA) population estimates for January 2025 place Belleville at a total population of 2,839. An estimated 2,267 of those people live within Dane County. Belleville's population has grown by 14% since the 2020 Decennial Census with an increase of 19% in just Dane County.

The proposed amendment area would add 203 residential units. Assuming 2.3 persons per housing unit, the amendment would account for approximately 467 additional residents. The DOA projects a total population of 3,824 by 2050. That is an increase of 985 people from the preliminary 2025 estimate, approximately 428 housing units. The proposed amendment would accommodate roughly 47% of the estimated housing demand.

Phasing

The amendment requested is under 100 acres and does not require a phasing plan, although it is anticipated that development will occur in multiple phases.

Surface Water Impacts

Development creates impervious surfaces (e.g., streets, parking areas, and roofs) and typically alters the natural drainage system (e.g., natural swales are replaced by storm sewers). Without structural best management practices (e.g., detention basins and infiltration basins) this would result in significantly increased stormwater runoff rates and volumes, as well as reduced infiltration (i.e., groundwater recharge). Even when designing to current state and county requirements, development results in increased runoff volume and reduced infiltration volume. Without structural best management practices for erosion control, development would also cause substantial short-term soil erosion and off-site siltation from construction activities. Scientific research has well documented that without effective

mitigation measures, the potential impacts of development on receiving water bodies can include the following:

- Flashier stream flows (i.e., sudden higher peaks)
- Increased frequency and duration of bank-full flows
- Reduced groundwater recharge and stream base flow
- Greater fluctuations in water levels in wetlands
- Increased frequency, level (i.e., elevation), and duration of flooding
- Additional nutrients and urban contaminants entering the receiving water bodies
- Geomorphic changes in receiving streams and wetlands

Natural drainage systems attempt to adapt to the dominant flow conditions. In the absence of mitigation measures, the frequency of bank-full events often increases with urbanization, and the stream attempts to enlarge its cross section to reach a new equilibrium with the increased channel forming flows. Higher flow velocities and volumes increase the erosive force in a channel, which alters streambed and bank stability. This can result in channel incision, bank undercutting, increased bank erosion, and increased sediment transport. The results are often wider, straighter, sediment laden streams, greater water level fluctuations, loss of riparian cover, and degradation of shoreland and aquatic habitat.

Since 2002, there have been stormwater management standards in effect at the state, county, and local level to require stormwater management and erosion control plans and structural best management practices designed to address the impacts of development on water quality, runoff volumes, peak flows, water temperature, and groundwater recharge. In 2011, county and local standards for runoff volume control were increased beyond state standards to further address the potential stormwater impacts of development. Since 2010 many communities adopted even higher standards for volume control through their own ordinances or as part of USA amendment agreements. In 2017, State statute 281.33(6)(a)(1) was changed to limit the ability of local governments to provide more protective standards for runoff volume control through local ordinances making it more difficult to fully mitigate the effects of development on receiving waters. In 2021, Dane County adopted peak rate control requirements for the 200-year storm event in their ordinance as well as requirements for closed basins, which applies to all communities in Dane County.

The Village of Belleville proposes to mitigate the urban nonpoint source impacts of the proposed development by requiring the implementation of various stormwater best management practices that will be designed and constructed to meet, or exceed, current Dane County standards for pollutant reduction, runoff volumes, peak flows, water temperature, and groundwater recharge. Such practices will help to address the potential

water quality impacts of stormwater runoff from the proposed development on the receiving waters.

Regional partners are actively working to address chlorides through the Wisconsin Salt Wise Partnership. WI Salt Wise's chloride reduction trainings are open to all municipal and private winter maintenance professionals in the region. Village of Belleville personnel are encouraged to attend winter salt certification classes and training for winter road maintenance to stay current on the latest trainings.

Groundwater Impacts

Without effective mitigation practices which *exceed* state, county and local ordinance, converting natural areas to urban development shifts the ground/surface water balance in streams and wetlands from a groundwater-dominated system to one dominated more and more by surface water runoff. This can result in a reduction in baseflow to streams, which is crucial for maintaining stream flow between precipitation events. This can also result in subsequent reductions in stream quality and transitions to less desirable biological communities more tolerant to these impaired conditions.

Groundwater modeling using the 2016 Groundwater Flow Model for Dane County, developed by the WGNHS (link to website), shows that 2010 modeled baseflow in Sugar River just downstream of the Ross Crossing Creek confluence decreased compared to predevelopment flow conditions. These reductions are likely due to the cumulative effects of well water withdrawals and loss of baseflow due to development in the groundwatershed. Pre-development conditions represent no well pumping within the model. Further decline compared to 2010 conditions is anticipated for the year 2040, according to modeling. Refer to Table 4 below.

Table 4
Modeled Baseflow Results Due to Current and Anticipated Future Municipal Well Water Withdrawals
(All Municipal Wells)

Stream	No Pumping	2010	2040
Sugar River (downstream of confluence with Ross Crossing Creek (*FID 10539)*	108.6 cfs	103.5 cfs	101.7 cfs

Source: Groundwater Flow Model for Dane County, developed by the WGNHS (2016 Modeling)

Generally, groundwater discharge occurs along the entire length of perennial streams and is the source of stream baseflow. The loss of baseflow from the cumulative effects of well water pumping and urbanization is a regional issue, beyond the boundaries of a single USA Amendment or even a single municipality. This issue is discussed along with potential management options in the updated *Dane County Groundwater Protection Planning Framework* (link to report). Reducing per capita water demand and fully maintaining pre-development groundwater recharge by infiltrating stormwater runoff helps to replenish groundwater, maintain baseflow, and mitigate this impact. The regional groundwater model is a useful tool for evaluating different configurations and scenarios of municipal groundwater well withdrawals on these stream systems.

Public Participation Comments

During the public review period, CARPC received five (5) written comments, all of which are included in **Attachment B** – Public Comment Received.

A public hearing was held on the proposed amendment at the September 11, 2025, meeting of the Capital Area Regional Planning Commission. Representatives from the Village of Belleville, including the Village Administrator and the Village's planning consultant (MSA Professional Services) gave a presentation on the proposed amendment and spoke in favor of it. There were two (2) registrants who spoke with concern about the amendment. Discussion among Commissioners followed. A recording of the public hearing is available as part of the video recording of the full Commission meeting on the CARPC Meetings webpage (link). The following summarizes the discussion:

- Anne Sullivan spoke with concern about the amendment (generally reiterating written commentary provided), discussing the extent of sensitive environmental resources nearby, water quality monitoring, stormwater, and roadway and utility infrastructure and requesting conditions of approval enumerated within written commentary.

- John Stremikis spoke with concern about the amendment (generally reiterating written commentary provided), discussing history of contamination and environmental concerns within Belleville and stating several requested conditions of approval enumerated within written commentary.

- Commissioner Schuler inquired seeking clarification regarding the defined land uses and densities of residential areas provided in the application.

- Commissioner Richson reiterated points heard during public commentary and requested that the Village meet with the commentators from the public (Anne and John). In response, the Village indicated that the Developer has already met with members of the public, but they would be willing to meet again.

- Commissioner Terrell requested additional information on the possibility of contamination. Discussion indicated that available database records were reviewed, but another review of existing databases for possible contamination would be conducted.

- Commissioner Terrell also inquired about stormwater drainage. In response, the Village described the topography on the site and general flow of drainage.

Conclusions and Staff Water Quality Recommendations

There is sufficient existing treatment plant system capacity at the Belleville Wastewater Treatment Facility to serve the proposed amendment area. There is sufficient existing capacity in the collection system to serve the initial phase(s) of development, although upgrades to a lift station will be needed to serve the full development within the amendment area.

The Village of Belleville proposes to mitigate the potential urban nonpoint source impacts of the proposed development on the receiving waters by requiring the implementation of stormwater best management practices that are designed and constructed to meet *or exceed* current standards for pollutant reduction, runoff volumes, peak flow rates, water temperature, and groundwater recharge.

It is CARPC staff's opinion that the proposed amendment is consistent with water quality standards under Wis. Stat. § 281.15, and the adopted Policies and Criteria for the Review of Sewer Service Area Amendments to the *Dane County Water Quality Plan*, with the existing state and local requirements identified below. In addition to the existing state and local requirements, the Village of Belleville and development team have agreed to pursue additional resource management measures for the amendment area, as identified below. Additional actions have also been recommended below to further improve water quality and environmental resource management.

State and Local Requirements

CARPC staff recommend approval of this amendment in recognition of state and local requirements including the following:

1. Environmental Corridors are required to be delineated to meet the Environmental Corridor Policies and Criteria adopted in the *Dane County Water Quality Plan*. Additionally, a 100-foot vegetated buffer shall be provided for the wetlands associated with Ross Crossing Creek (located south and east of the amendment area) and shall be included within Environmental Corridor. Additionally, a 20' vegetated buffer shall be provided along the northern, eastern, and southern borders of the amendment area and shall be included within Environmental Corridor.

2. Sediment and erosion control practices are required to be installed prior to other land disturbing activities. Infiltration practices are required to be protected from compaction and sedimentation during land disturbing activities.

3. Easements and perpetual legal maintenance agreements with the Village of Belleville, to allow the Village to maintain stormwater management facilities if owners fail to do so, are required for any facilities located on private property.

4. Temporary erosion and sediment control best management practices shall be implemented to reduce the occurrence of sediment transport offsite during construction. If development occurs in phases, interim stormwater management practices shall be implemented to ensure compliance with all applicable regulations.

5. Review and approval of stormwater management plan(s) for the amendment area by Regional Planning Commission staff is required as part of the sewer extension review process. Stormwater management plan(s) shall meet or exceed all applicable standards required by Wisconsin DNR (NR 151), Dane County (Ch 14), and Village of Belleville (Chapter 450), including:

    a. Post-development peak runoff rate control for the 1-, 2-, 10-, 100-, and 200-year, 24-hour design storms (using NRCS MSE4 storm distributions) to match predevelopment peak runoff rates.

    b. Sediment control for the average annual rainfall period to reduce total suspended solids leaving the post-development site by at least 80%, as compared to no runoff management controls, with sediment control pretreatment occurring prior to infiltration for runoff from parking lots and new road construction within commercial, industrial, and institutional land uses.

    c. Post-development infiltration (stay-on) volume control to maintain at least 90% of the predevelopment infiltration (stay-on) volume for the average annual rainfall period, without exception for sites determined to be within a closed basin watershed.

    d. Maintain predevelopment groundwater annual recharge rates of approximately 9 to 10 inches per year, as estimated in *Groundwater Recharge in Dane County, Wisconsin Estimated by a GIS-Based Water Balance Model* (Wisconsin Geological and Natural History Survey, 2012), or by site-specific analysis, as an elective alternative to meeting the 90% stay-on requirement if more than two percent (2%) of the site is required to be used as effective infiltration area, if allowed by ordinance.

e. Thermal control to reduce the temperature of stormwater runoff from development sites within thermally sensitive watersheds.

f. Oil and grease control to treat the first one-half inch of runoff using the best available technology for commercial, institutional, and any other land uses where the potential for pollution by oil or grease exists.

Additional Agreements for the Amendment Area

In addition to the above requirements, the Village of Belleville and development team have agreed to pursue the following measures for the amendment area:

1. Review and approval of stormwater management plan(s) for the amendment area by Regional Planning Commission staff is required as part of the sewer extension review process, to ensure that these agreements have been pursued to the maximum extent practicable:

    a. Seek to control post-development infiltration (stay-on) volume to maintain 100% of the predevelopment infiltration (stay-on) volume for the average annual rainfall period, if determined to be practicable based on site-specific soil conditions, but requiring consideration of decentralized infiltration practices across the plat. In meeting this requirement, credit will be given for offsite runoff which runs onto the site and is infiltrated within onsite practices.

    b. Thermal control to reduce the temperature of stormwater runoff from the amendment area discharging to the wetlands (south and east of the amendment area) which have a direct hydrologic connection to Ross Crossing Creek, an area of special natural resource interest (ASNRI) for being an Exceptional Resource Water (ERW), and which has a coldwater attainable use designation by DNR.

    c. Post-development runoff volume control for the 1-, 2-, 10-, 100-, and 200-year, 24-hour design storms (using NRCS MSE4 storm distributions) to match predevelopment runoff volumes.

2. The Village shall upgrade the impellers within Green View lift station, as necessary based on phasing of development, to provide sufficient capacity to convey the additional flows from the proposed amendment area. In lieu of this work being completed, each phase of development shall demonstrate sufficient capacity within the lift station to handle the anticipated loading prior to issuance of a water quality conformance letter (208 letter).

Recommendations

It is recommended that the Village of Belleville pursue the following to further improve water quality and environmental resource management:

1. Foster the responsible use of chlorides by encouraging public and private winter maintenance professionals to attend the winter salt certification classes offered by Wisconsin Salt Wise.

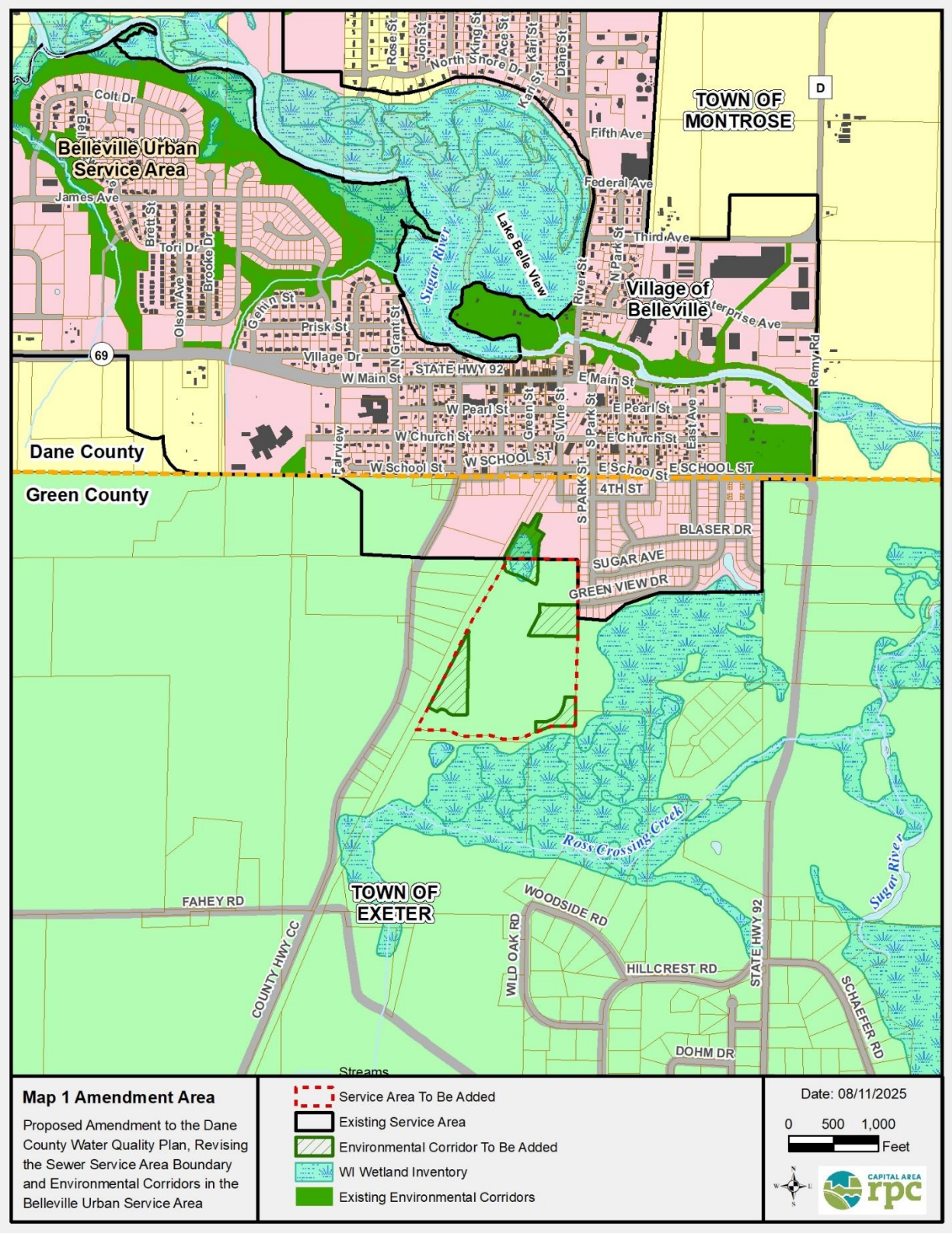
2. Consider the use of fencing and/or signage along the exterior perimeter of the development site to aid in wayfinding, separation of private and public properties, and educational opportunities regarding the adjacent sensitive ecosystems.

3. Encourage the removal and control of invasives and the use of native flora in landscaping, where appropriate within the entire amendment, and for all areas designated as Environmental Corridor.

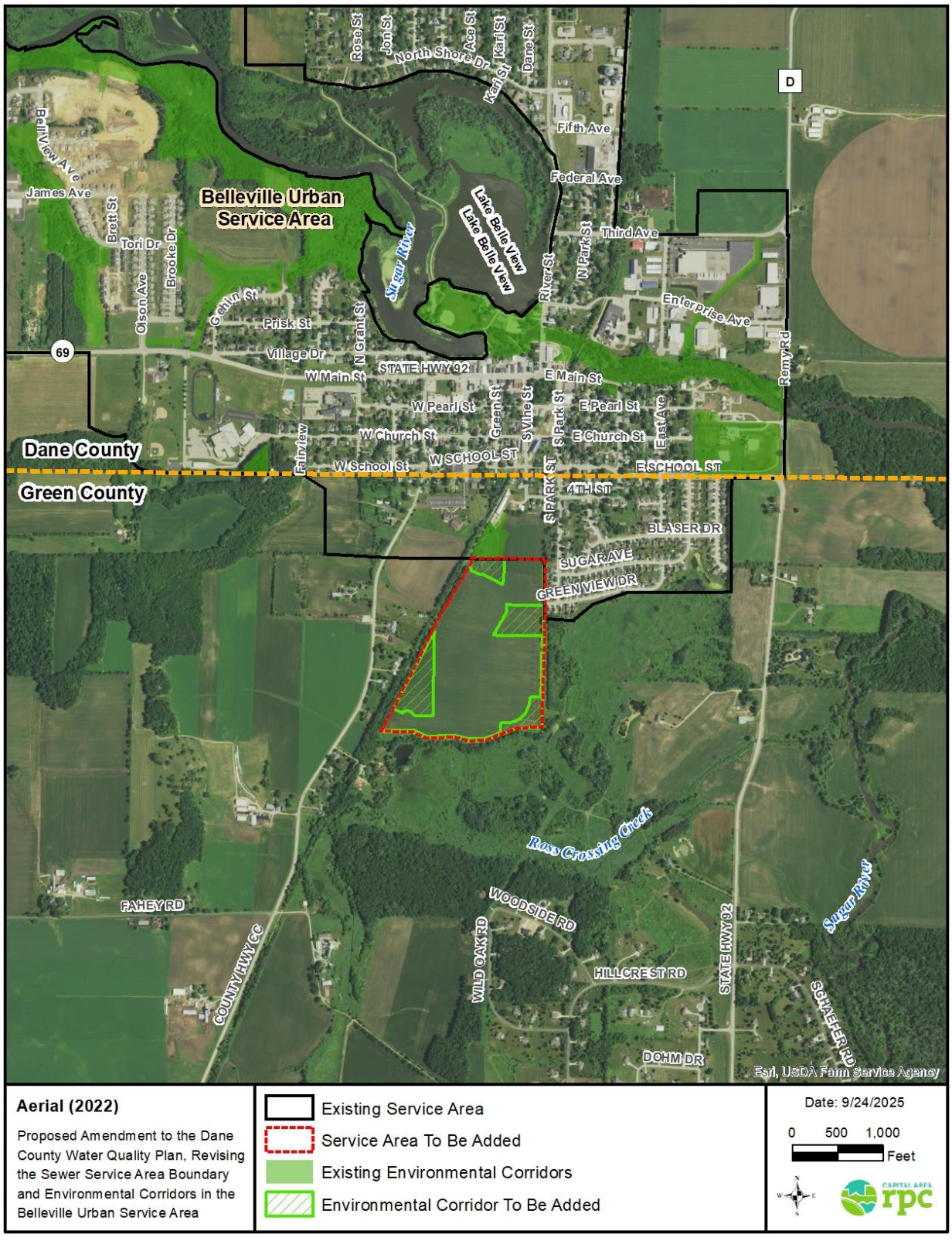
4. Request a formal Endangered Resources Review by the WDNR for potential impacts to endangered resources like rare plants, animals, and natural communities, and take necessary habitat protection measures if species are found, based on the results of screening conducted.

5. Require a Phase I archaeological survey prior to ground disturbances for the entire development area due to the high potential for archaeological resources, and take appropriate protection if resources are found.

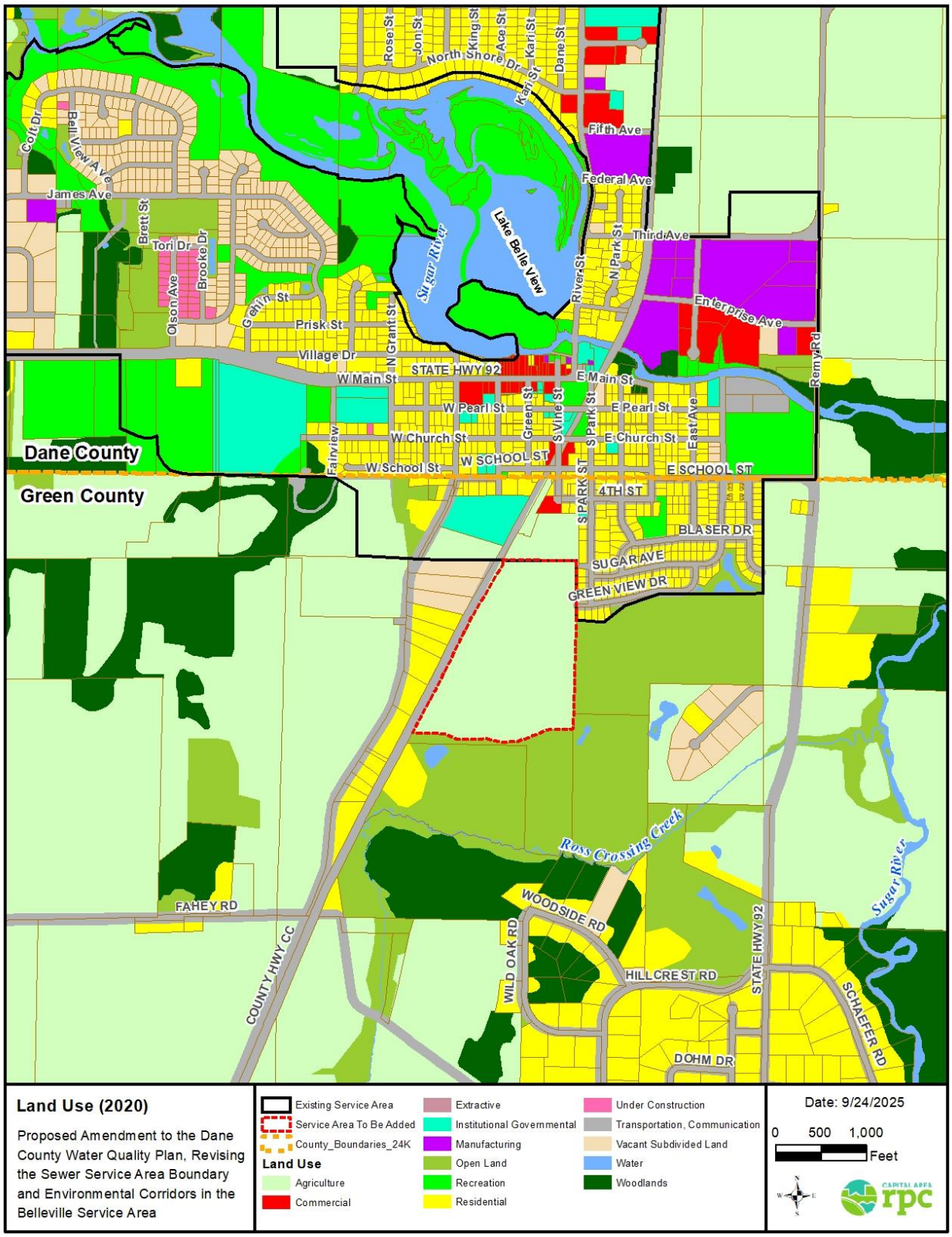
Map 1 - Amendment Area



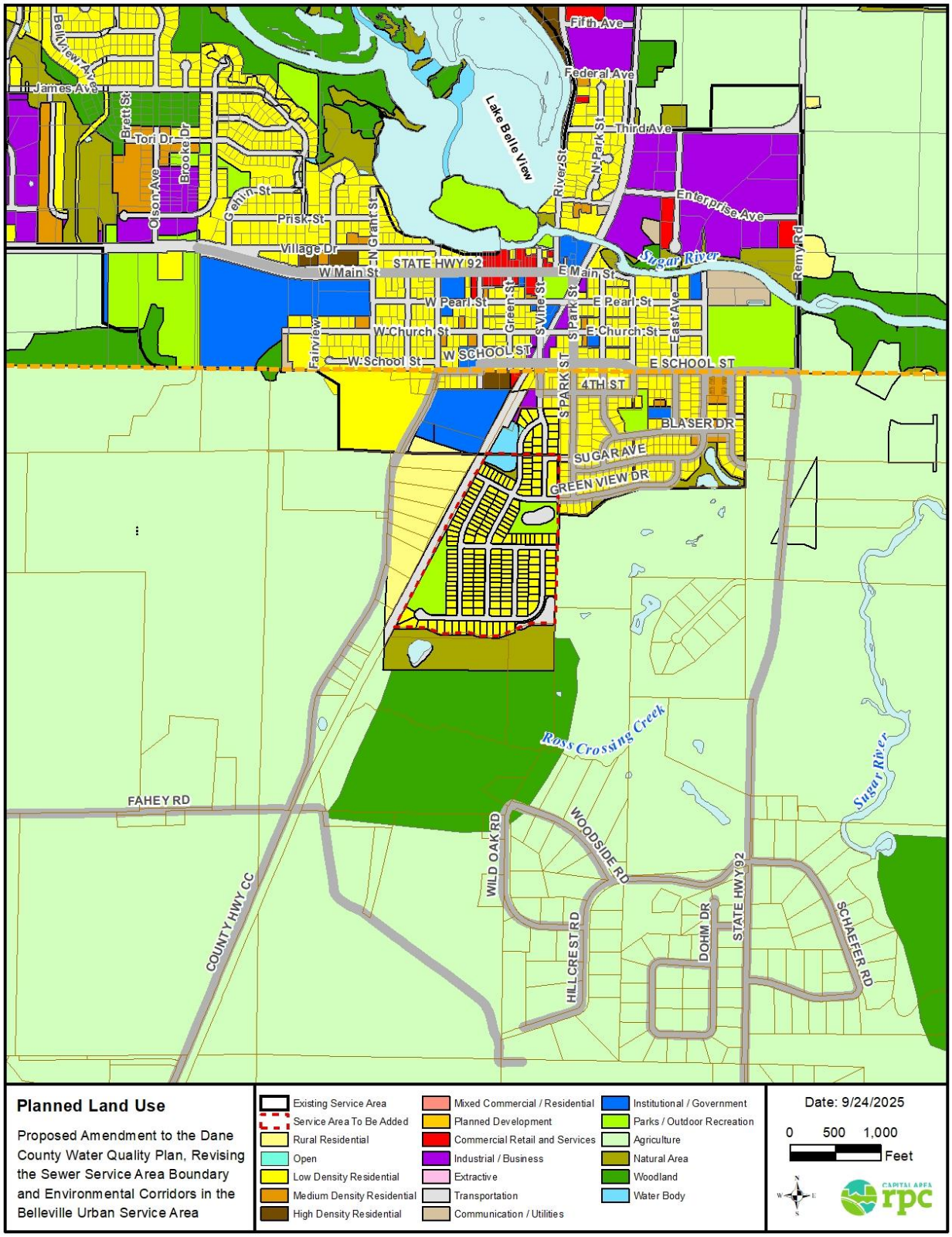
Map 2 – Aerial


Belleville Urban Service Area
Dane County
Green County
Sugar River
Lake Belle View
Ross Crossing Creek
Rose St
Jon St
North Shore Dr
Ace St
Karl St
Dane St
Fifth Ave
Federal Ave
Third Ave
N Park St
River St
Enterprise Ave
Remy Rd
Bell View Ave
James Ave
Brett St
Tori Dr
Brooke Dr
Olson Ave
Genlyn St
Prisk St
Village Dr
N Grant St
STATE HWY 92
W Main St
E Main St
W Pearl St
E Pearl St
Green St
S Vine St
S Park St
East Ave
W Church St
E Church St
Fairview
W School St
W SCHOOL ST
E SCHOOL ST
4TH ST
BLASER DR
SUGAR AVE
GREEN VIEW DR
FAHEY RD
COUNTY HWY CC
WOODSIDE RD
WILD OAK RD
HILLCREST RD
STATE HWY 92
SCHAEFER RD
DOHM DR
69
D
Esri, USDA Farm Service Agency
Aerial (2022)
Proposed Amendment to the Dane County Water Quality Plan, Revising the Sewer Service Area Boundary and Environmental Corridors in the Belleville Urban Service Area
Existing Service Area
Service Area To Be Added
Existing Environmental Corridors
Environmental Corridor To Be Added
Date: 9/24/2025
0 500 1,000
Feet
CAPITAL AREA rpc

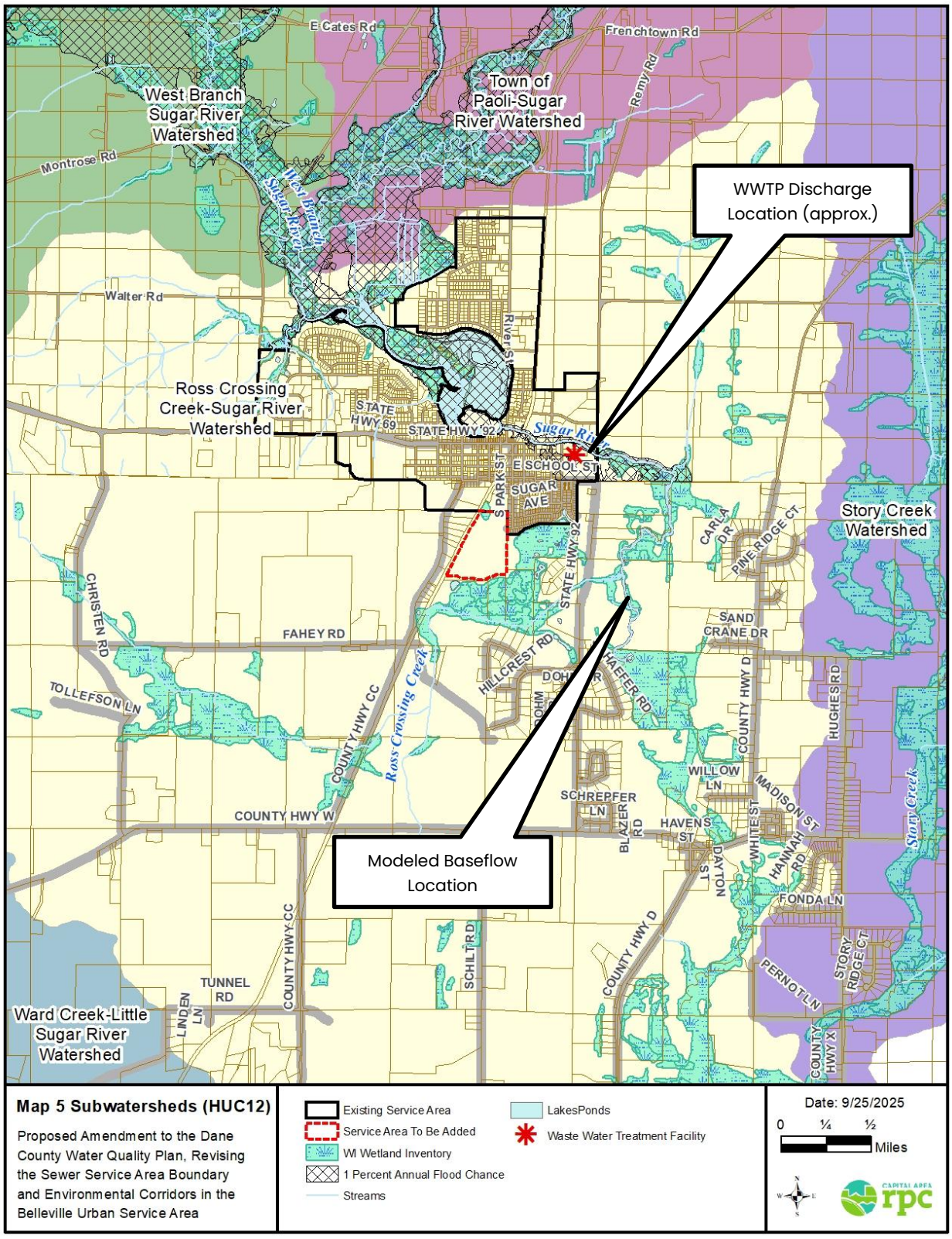
Map 3 – Existing Land Use



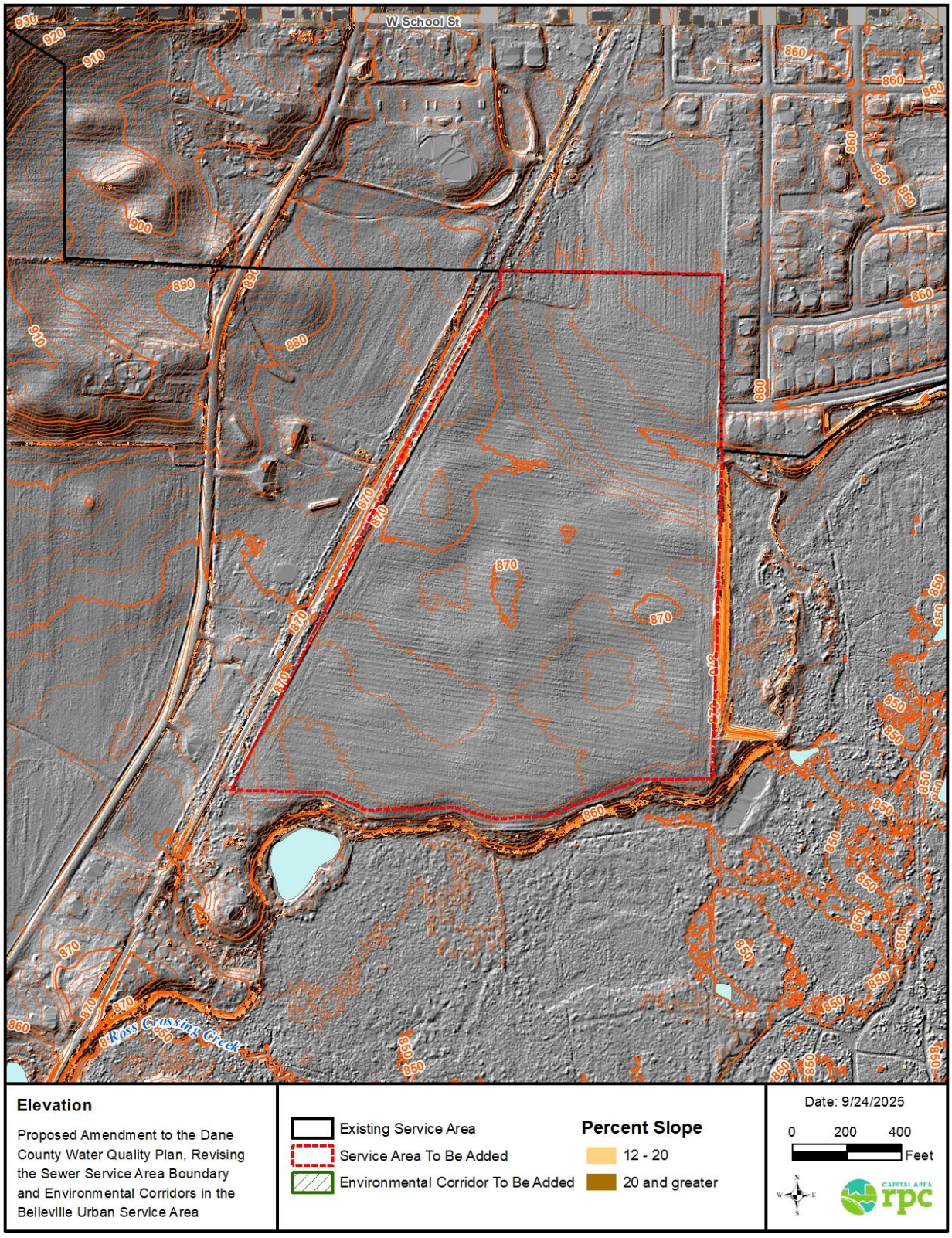
Map 4 – Planned Land Use



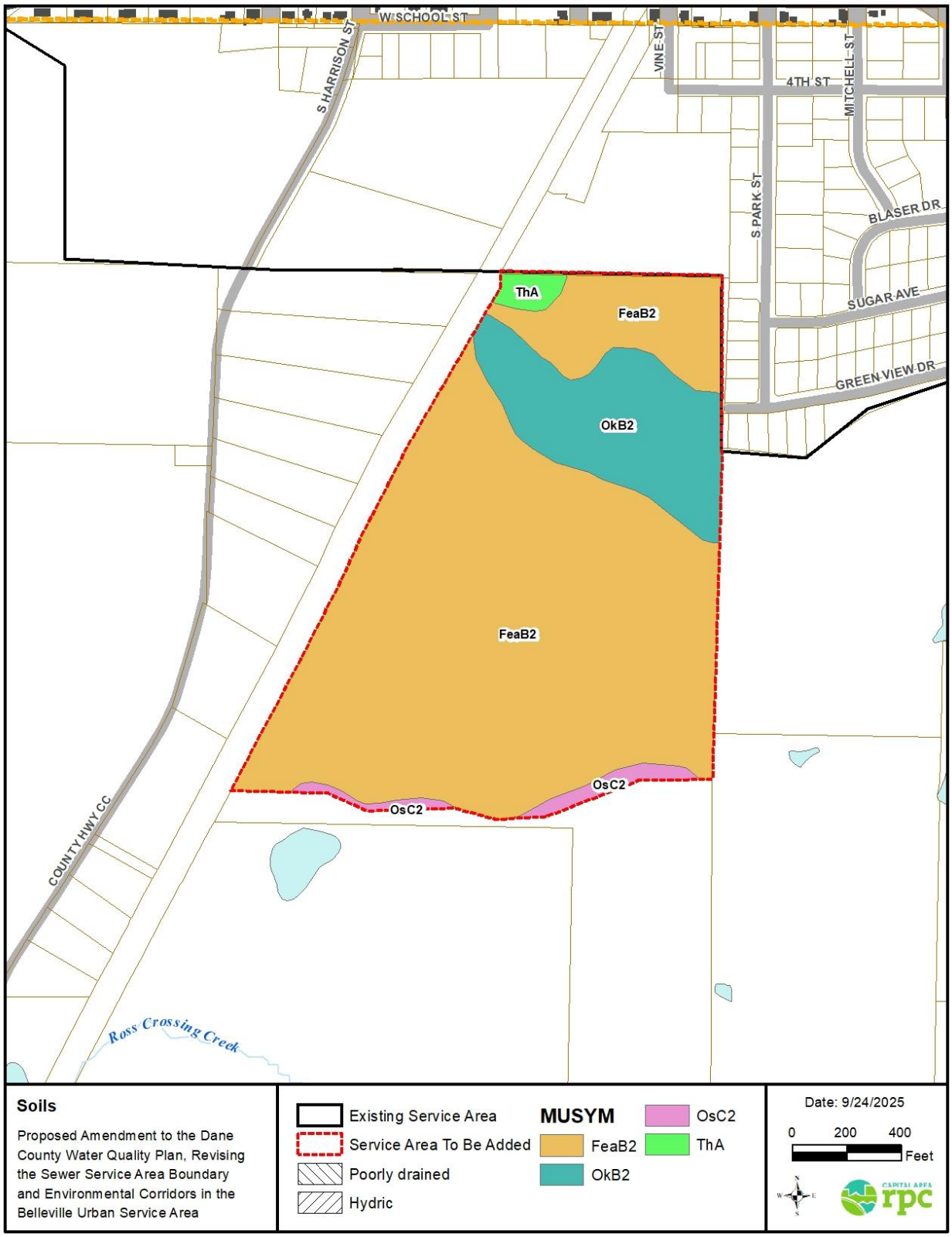
Map 5 – Subwatersheds



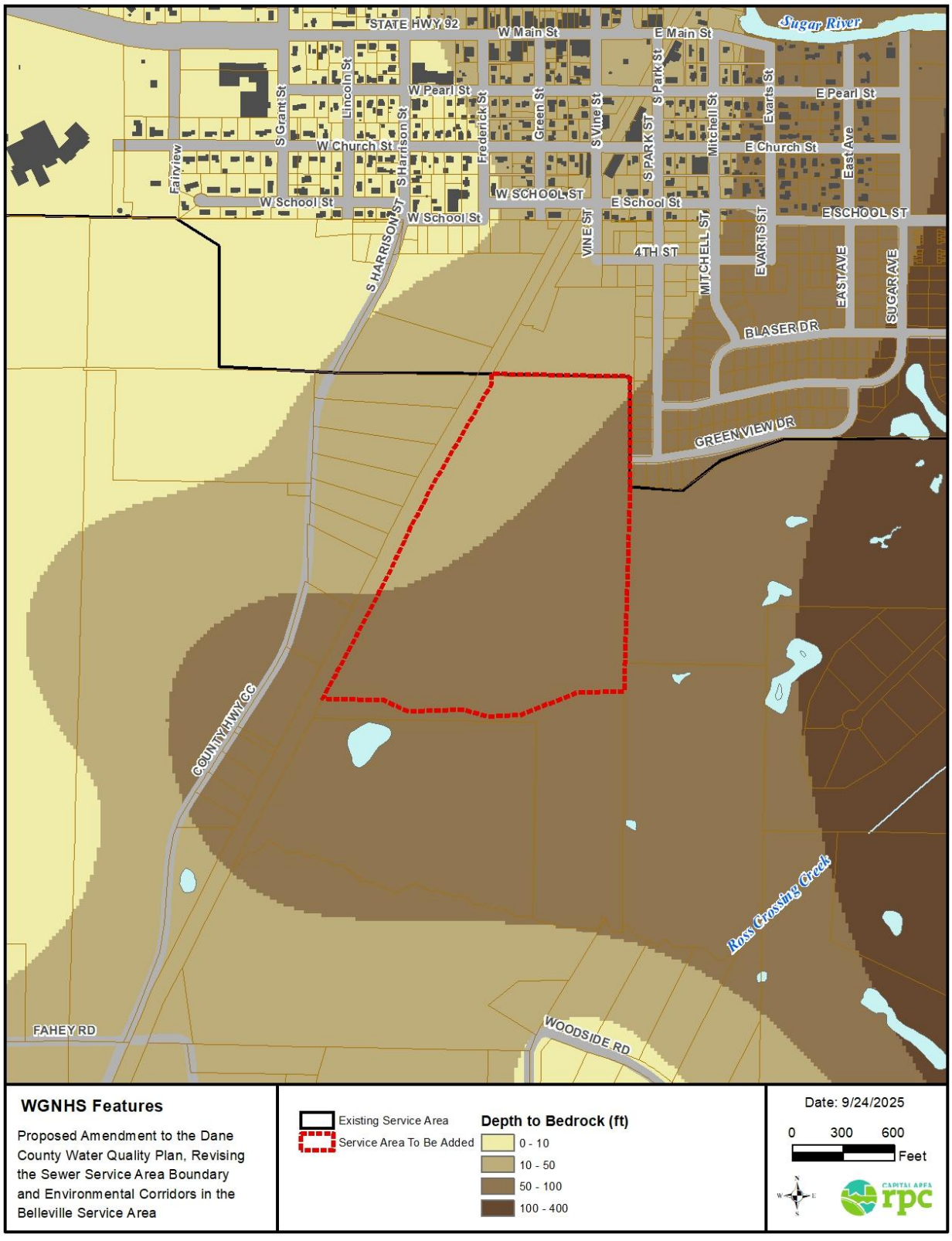
Map 6 – Elevations



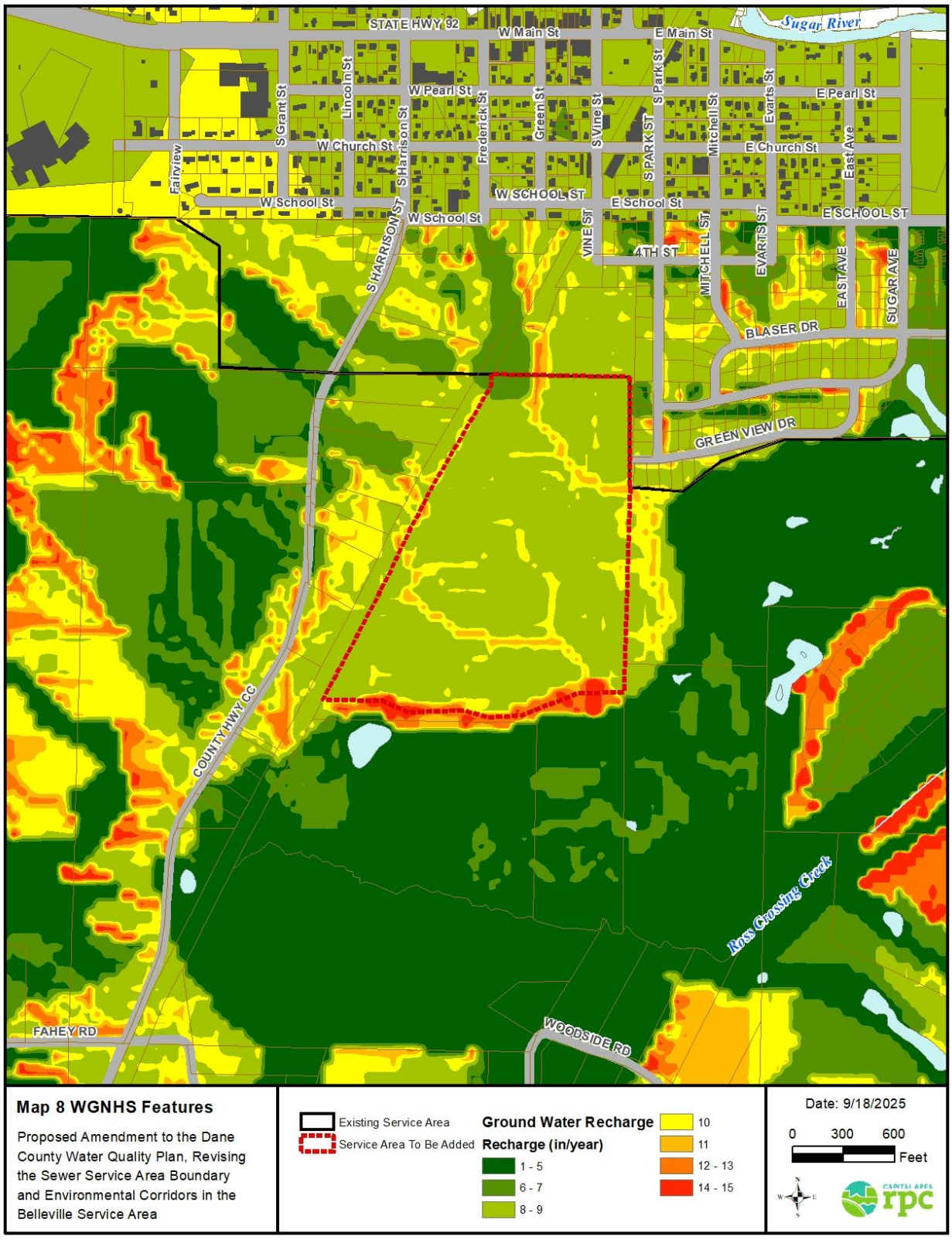
Map 7 - Soil Type



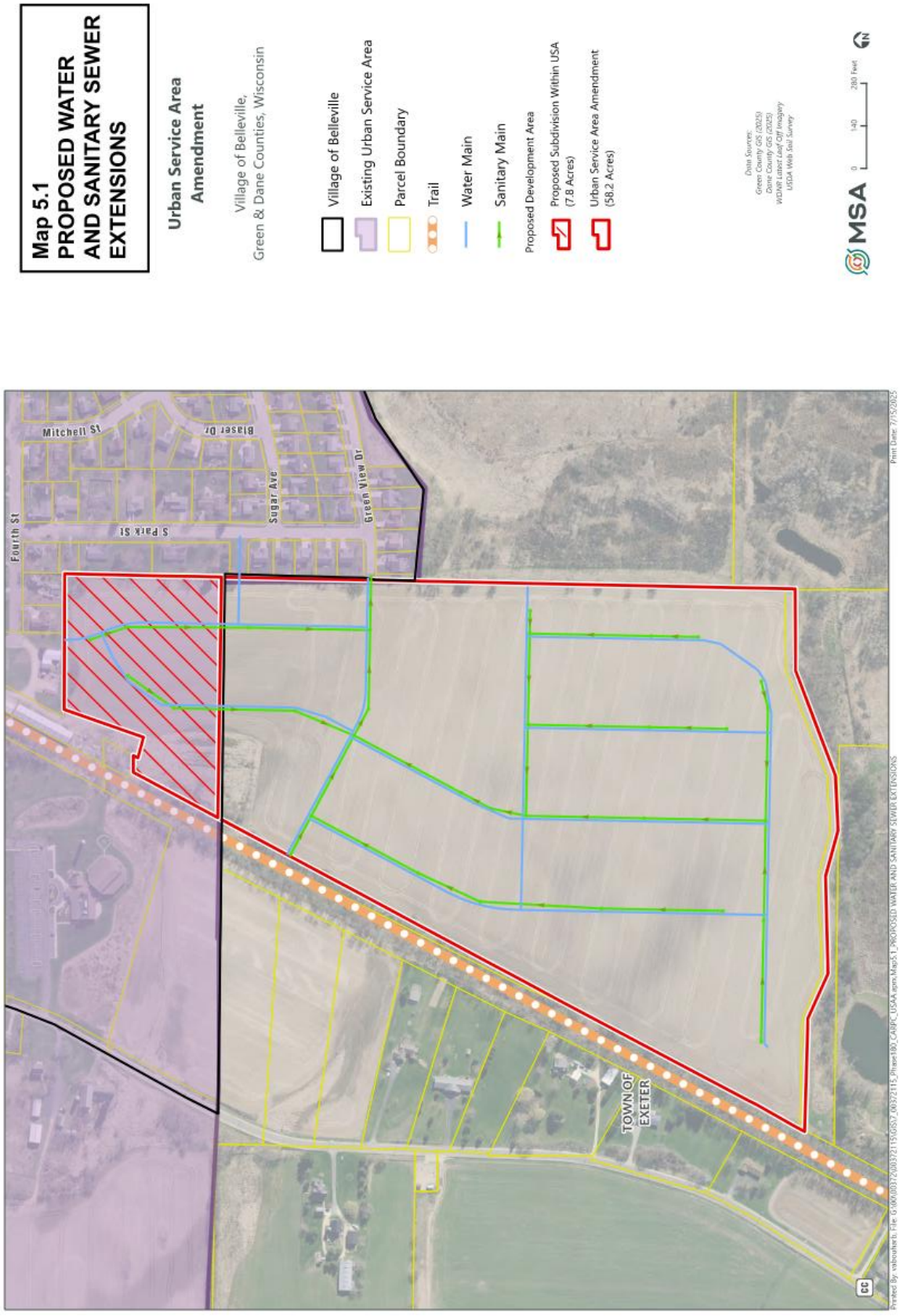
Map 8a – WGNHS Bedrock Depth



Map 8b – WGNHS Groundwater Recharge Rates

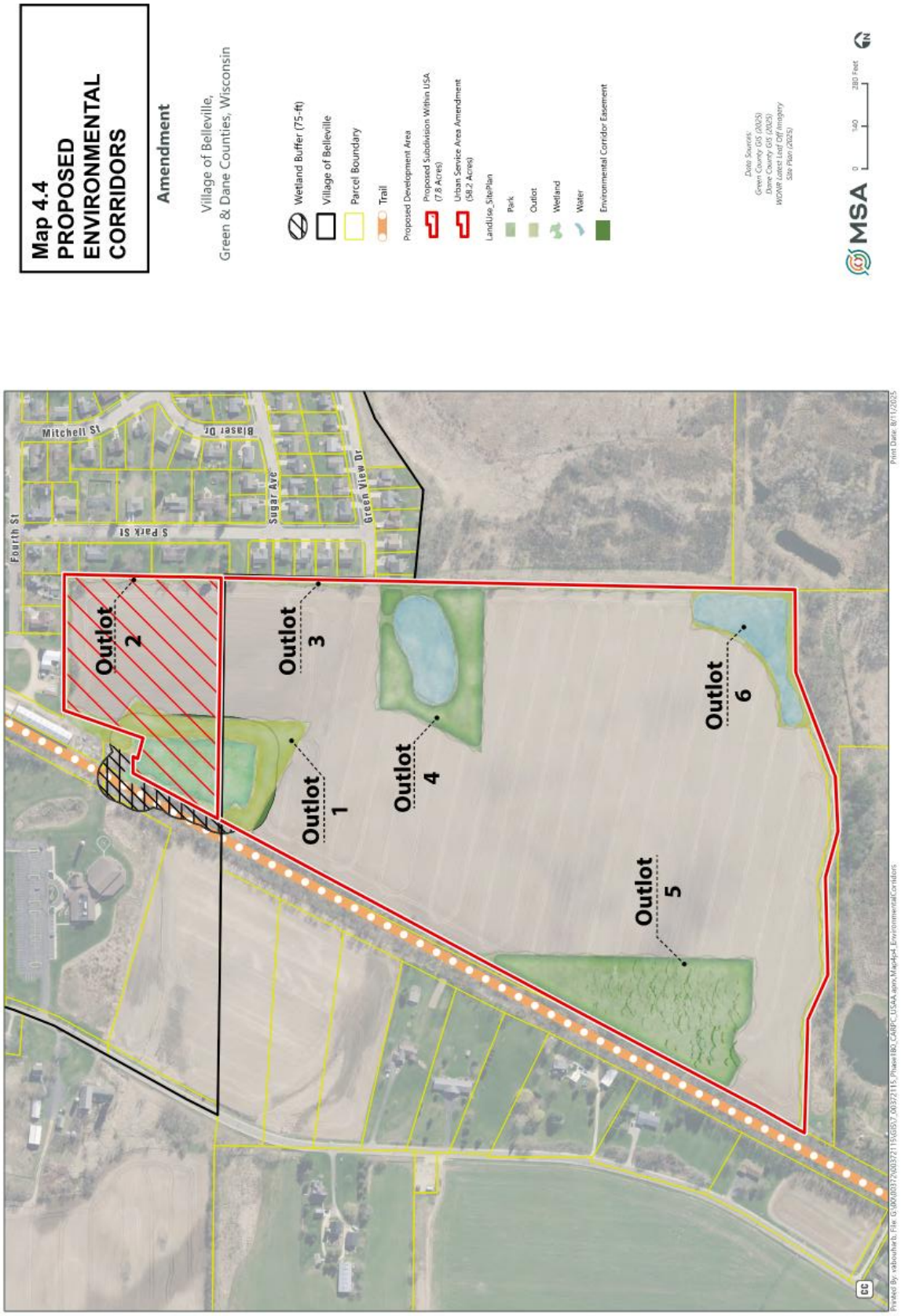


Map 9a – Proposed Sanitary Sewer and Water Main



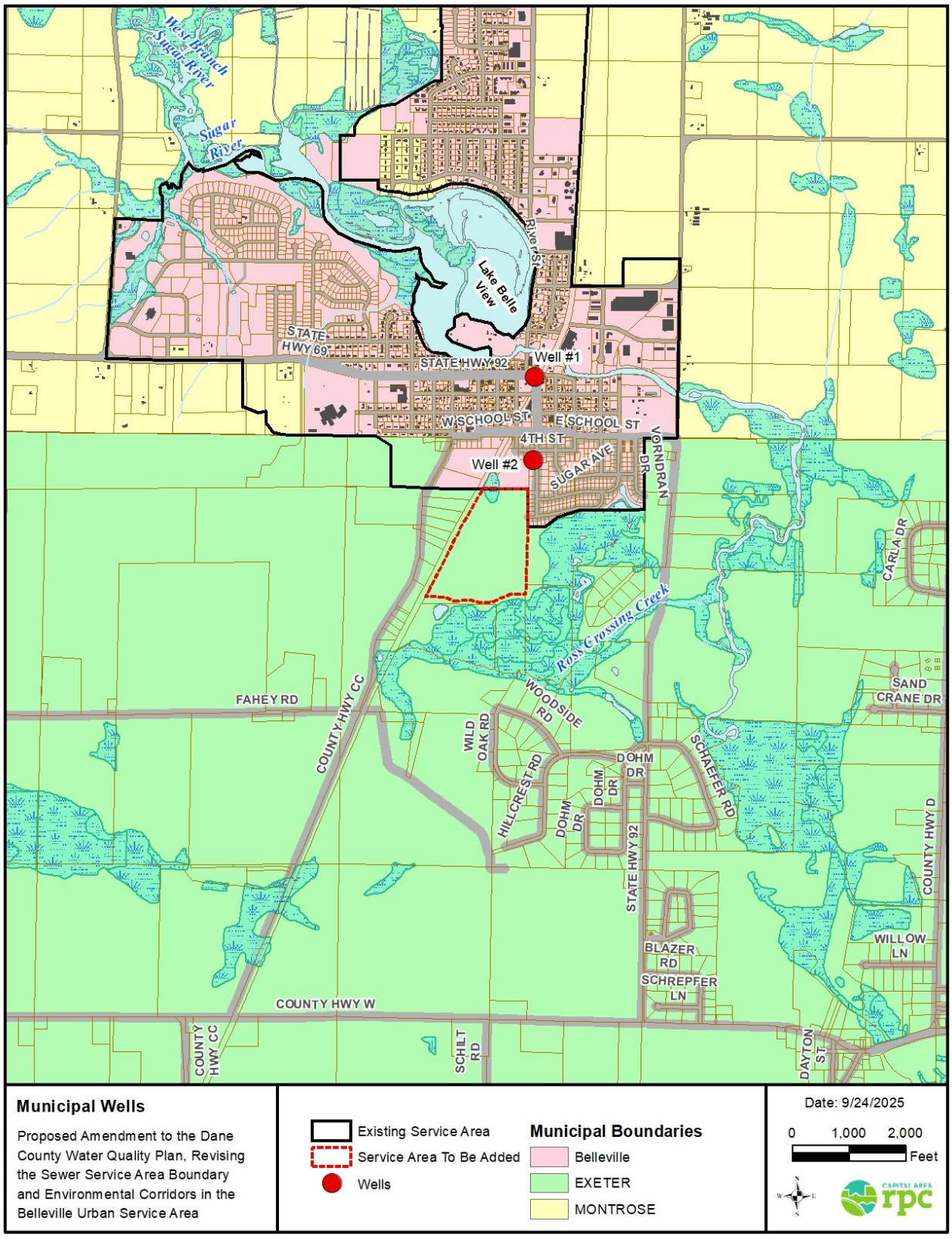
Source: MSA Professional Services (USAA Application, August 11, 2025)

Map 9b – Proposed Stormwater Management

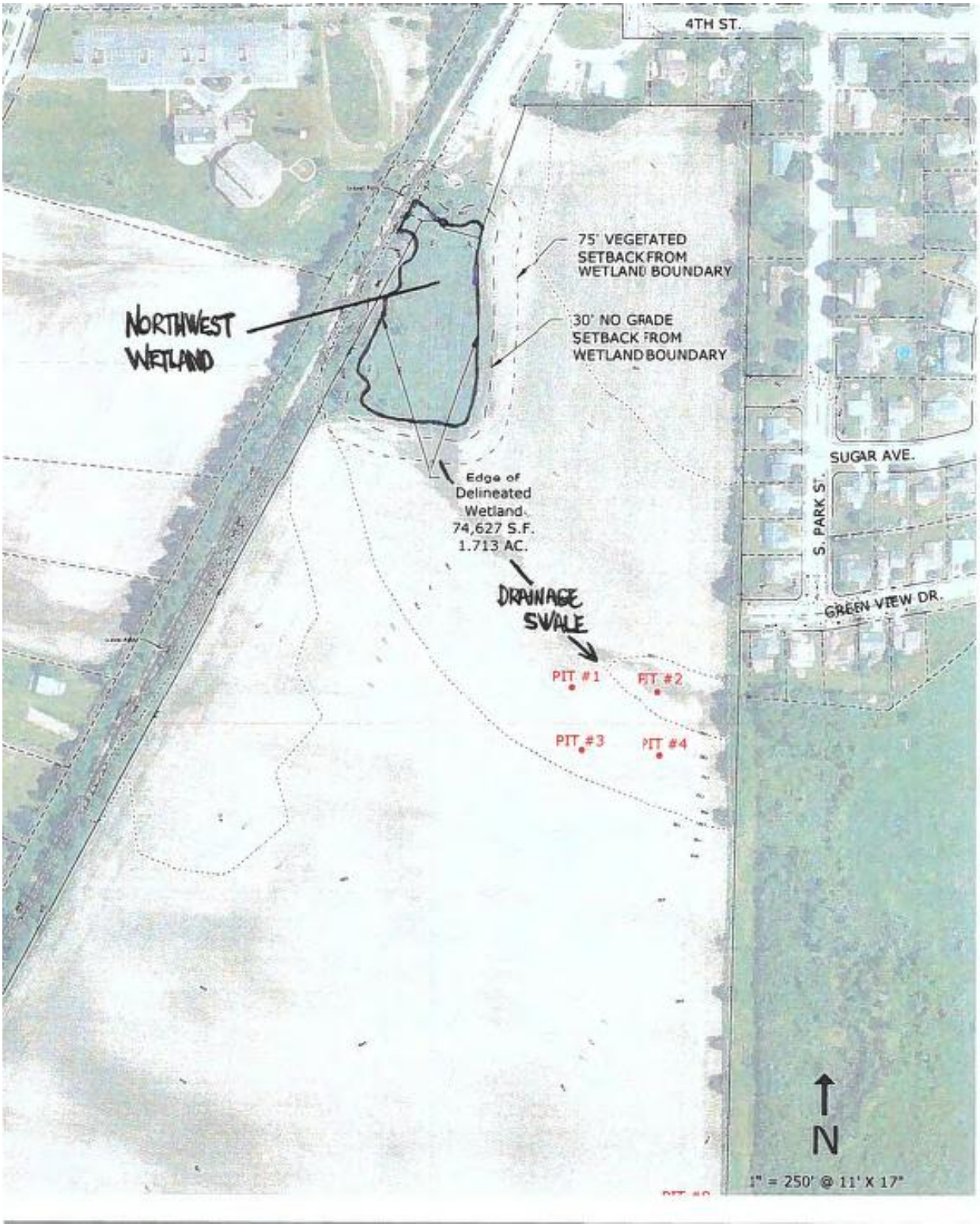


Source: MSA Professional Services (USAA Application, August 11, 2025)

Map 10 – Municipal Wells

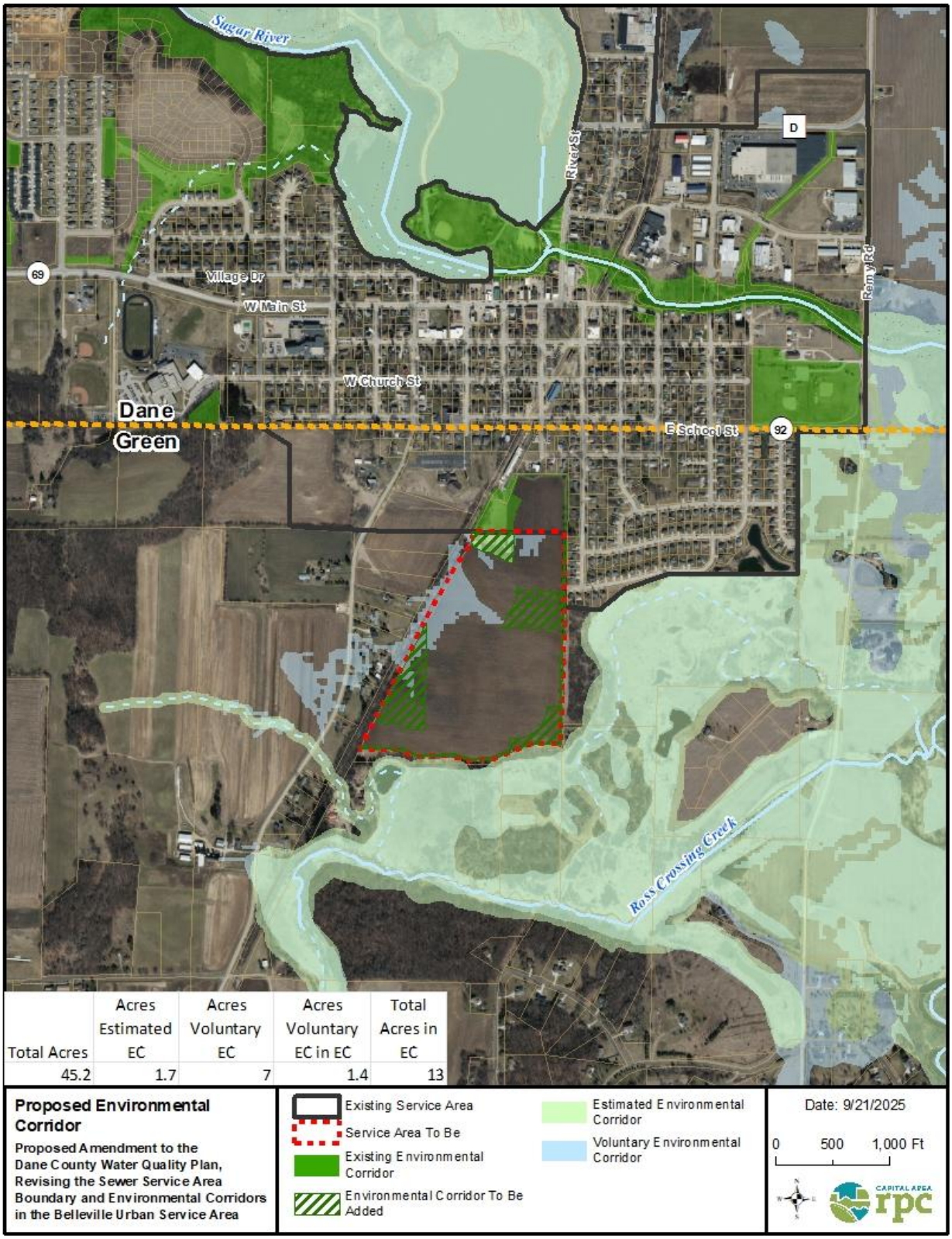


Map 11 – Wetland Delineation



Source: Wetland Delineation and Assessment Report (Geothink, 2025)

Map 12 – Proposed Environmental Corridor



Attachment A – WHS Letter

WISCONSIN HISTORICAL SOCIETY

August 7, 2025

Mr. Sean Higgins
Capital Area Regional Planning Commission
100 State St, Ste 400
Madison WI 53703-2573

RE: Proposed Amendments to Village of Belleville Urban Service Area

Dear Mr. Higgins:

No previously recorded archaeological sites have been recorded in the parcel delineated in the proposed amendment. No previous formal archaeological survey has been conducted in the area however, so there is potential for unrecorded archaeological sites to be present. Given the proximity to a wetland and what appears to be a high potential for archaeological resources in this area, we recommend that phase I archaeological survey take place in advance of any ground disturbance in the proposed amendment area.

Under Wisconsin law, Native American burial mounds, unmarked burials, and all marked and unmarked cemeteries are protected from intentional disturbance. If anyone suspects that a Native American burial mound or an unmarked or marked burial is present in an area, the Wisconsin Historical Society should be notified.

If human bone is unearthed during any phase of a project, **all work must cease**, and the **local authorities must be contacted**. The police or sheriff will determine if the burial is a criminal matter or if it should be referred to the Wisconsin Historical Society at 1-800-342-7834 to be in compliance with Wis. Stat. § 157.70 which provides for the protection of all human burial sites. **Work cannot resume until the Wisconsin Historical Society gives permission**.

This letter does not constitute a Wisconsin Historical Society review for any project that may be governed by Federal or State Compliance laws, e.g. Section 106, Wis Stat. §44.40, Wis Stat. §66.1111, or Wis Stat. §157.70

If you have any questions, or if you need additional information, please feel free to contact me.

Sincerely;

Walker Good
Staff Archaeologist
State Archaeology and Maritime Preservation
608-264-6496
walker.good@wisconsinhistory.org

Attachment B – Public Comments Received

Sept 7, 2025 - Richard Alme

To the Members of CARPC:

I am writing about the Badger Trails subdivision that was recently approved by the village of Belleville. I own 70-plus acres of rural property on which me and my family have lived and hunted for 30 years. Over time I have restored oak savannah on that property, which the Natural Resources Conservation Service has encouraged as a valuable contribution to preserving that environment.

One of my main concerns about the Badger Trails Subdivision is the volume of runoff that it will generate, which will inevitably flow onto my property. I have seen the subdivision plan that includes two retention/detention ponds next to my property. I have concerns that the these are not enough to prevent contamination and erosion of the wetlands and savannah, since water temperature, lawn chemicals, road salt can do a lot of damage. Closer investigation of additional measures to prevent these issues requires more time and thought.

A second concern is that the addition of over 500 people living right next to my land is going to prevent me from being able to use and maintain my property for the recreation and restoration purposes I value. This includes hunting, hiking, wood cutting and other activities that require safe conditions that could be compromised by trespassers coming onto my land.

While there is a park in the current plat design, next to the Badger Trail, there is virtually no space planned for parking. Even if easy access in and out of the park from the Badger Trail were available, there isn't the space needed to manage traffic in and out of that area without additional lot land being reassigned to parking.

Richard Alme
N9231 Hillcrest Road
Belleville, WI 53508

Richard C Alme

Sept 7, 2025

Sept 8, 2025 – Scott Canon

Outlook

Belleville Meeting Letter

From Scott Canon <scottcanon2000@gmail.com>
Date Mon 9/8/2025 2:26 PM
To Joan Stuessy <JoanS@capitalarearpc.org>

To the Commissioners,
I am writing in regards to the proposed Badger Trails development south of Belleville. I am a Village Trustee who was elected after the annexation was approved. My constituents have expressed significant concerns about the negative effects this development will have on the community and the environment. Badger Trails as it stands currently will have 203 units. This development will result in an increase in population of over 40%. The thousands of daily car trips that this population will require will be on two regular residential streets, Greenview Drive and Sugar Ave. These two streets were not built for and are not capable of handling that traffic flow. A third traffic outlet that would connect to County Highway CC has been promised by the Village, but is not in the current plans. It would also require using eminent domain and building over the Badger State Trail two hurdles unlikely to both be crossed. The traffic flow in the current plan would overwhelm these residential streets and create dangerous traffic conditions. The environmental effects of Badger Trails are unknown, but likely to be significant. The area south of the development is a wetland centered around Ross Crossing Creek. Ross Crossing Creek is listed by the Wisconsin Department of Natural Resources as an Exceptional Resource Water, which allows new discharges only if they maintain current water quality. Replacing farmland which absorbs water with asphalt that does not will significantly increase water flow into the creek. This will raise the water volume and temperature effecting trout populations not just in Ross Crossing Creek, but in the Sugar River into which it drains. The trout of Sugar River are a vital resource for the region. When you take into account the massive increases in sediment during construction, increases in lawn chemicals, and the attendant pollution from automobiles this development could have disastrous effects on tourism in southern Wisconsin.

In conclusion the Village of Belleville does not have the public safety, infrastructure, education, or fiscal capacity to manage this growth. This is in addition to the traffic, environmental, and economic consequences of Badger Trails. This is a poorly planned development that would need to significantly lower density if it occurs at all. For this myriad of reasons I ask this commission to reject the Urban Service Area Amendment required for the Badger Trails development.
Thank You
Scott Canon
Belleville Village Trustee

Sept 9, 2025 - Southern Land Conservancy (via Susan Lehnhardt/Steven Apfelbaum)

Outlook

Fwd: Testimony for CARPC Meeting SEP 11, 2025, 6PM

From Susan Lehnhardt <lehnhardt.susanm@gmail.com>
Date Tue 9/9/2025 4:48 PM
To Matthew Kozlowski <MatthewKoz@capitalarearpc.org>
Cc Steve Apfelbaum <steve@aeinstitute.org>

3 attachments (4 MB)

SWLC_testimony_09SEP2025.pdf; 1_Geospatial Analysis_swlc testimony_11SEP2025.pdf; 2_Conservation Dev Approach_swlc testimony_11SEP2025.pdf;

TO: Matthew Koz

Please note: this email was initially transmitted to Joan Steussy, which prompted an email directing us to your address. Please see the attachments that accompanied the original email in this thread. Thank you.

Please accept and transmit our attached testimony including referenced attachments to the CARPC members for consideration at their meeting scheduled on September 11, 2025 at 6PM, regarding the Belleville Badger Rails Subdivision relative to the Urban Service Area. Please also enter our testimony and referenced attachments into the meeting record.

Respectfully submitted,

Susan M Lehnhardt, Ecologist
Secretary, Southern Wisconsin Land Conservancy
lehnhardt.susanm@gmail.com
(C) 608.558.5941

---------- Forwarded message ---------
From: **Susan Lehnhardt** <lehnhardt.susanm@gmail.com>
Date: Tue, Sep 9, 2025 at 2:44 PM
Subject: Testimony for CARPC Meeting SEP 11, 2025, 6PM
To: <JoanS@capitalarearpc.org>
Cc: Steve Apfelbaum <steve@aeinstitute.org>

TO: Joan S

Please accept and transmit our testimony including referenced attachments to the CARPC members for consideration at their meeting scheduled on September 11, 2025 at 6PM, regarding the Belleville

Badger Rails Subdivision relative to the Urban Service Area. Please also enter our testimony and referenced attachments into the meeting record.

Respectfully submitted,

Susan M Lehnhardt, Ecologist
Secretary, Southern Wisconsin Land Conservancy
lehnhardt.susanm@gmail.com
(C) 608.558.5941

SOUTHERN WISCONSIN LAND CONSERVANCY

protecting wild and working lands

To: Members of the Capital Area Regional Planning Commission (CARPC) (submitted via email to JoanS@capitalarearpc.org)

From: Steven I. Apfelbaum, President Southern Wisconsin Land Conservancy

Date: September 9, 2025

RE: Letter of Testimony to be entered into the record at the September 11, 2025, 6PM meeting regarding the Belleville Badger Trails Subdivision relative to the Urban Service Area

Southern Wisconsin Land Conservancy (SWLC) has been working with the Sullivans to protect the conservation values on their land. During this process, SWLC has attended at least one face-to-face meeting with the Village of Belleville staff to share information and case studies from regionally successful conservation communities, which we prepared in order to inform the village and developer of the proven ecological and economic benefits of this development approach. Please find the two attachments provided to the Village, which include:

1. Geospatial analysis (employing *Stratifyx* software) of the Sullivan property and a portion of the abutting development that visualizes key ecological features, including landcover by forest, wetlands, and surface waters, and the extent of flood hazard risk.

2. Conservation Development Approach, a summary review of conservation community opportunities and their success compared to conventional development designs in the region. Some of the example successes were projects that SWLC leadership had years of personal involvement with, including design, permitting, and work throughout construction, and for several decades after construction. Projects such as *Prairie Crossing* in Grayslake, IL (among many other examples) have contributed to community benefits, durable neighborhoods, low maintenance, and low-cost operations and maintenance costs for the municipalities, in addition to less traffic, and the protection and management of large public open space systems that were foundational to creating livable, safe communities.

While there appeared to be interest in someday exploring conservation community opportunities in Belleville, when we met with the Village staff, they expressed concern regarding litigation pressure from the developer, if the Village did not move promptly and grant development approvals for the application before the Village.

3. Attached documents 1 and 2 were presented in writing, along with a PowerPoint presentation (not attached), presented to a group of neighbors at the Belleville Public Library. A high level of interest, and bewilderment, was expressed regarding why the Village would not advance a process of civic engagement and decision-making to leverage and catalyze improved plans and development outcomes over what was being proposed by the developer, which has apparently been approved by the Village. 'Who do the staff of the Village work for?' was articulated several times during the meeting by community members. 'Do they work for the developer, or for the betterment of the village and its citizens?'

The above notes and attachments are submitted to clarify that SWLC witnessed an earnest attempt to have open conversation between the Sullivans, neighbors, and our organization, and the Village and the developer.

Steven I. Apfelbaum
Southern Wisconsin Land Conservancy
Brodhead, WI 53520
steve@aeinstitute.org
608-201-9375

Attachments:
1. Geospatial Analysis_swlc testimony_11SEP2025
2. Conservation Dev Approach_swlc testimony_11DEP2025

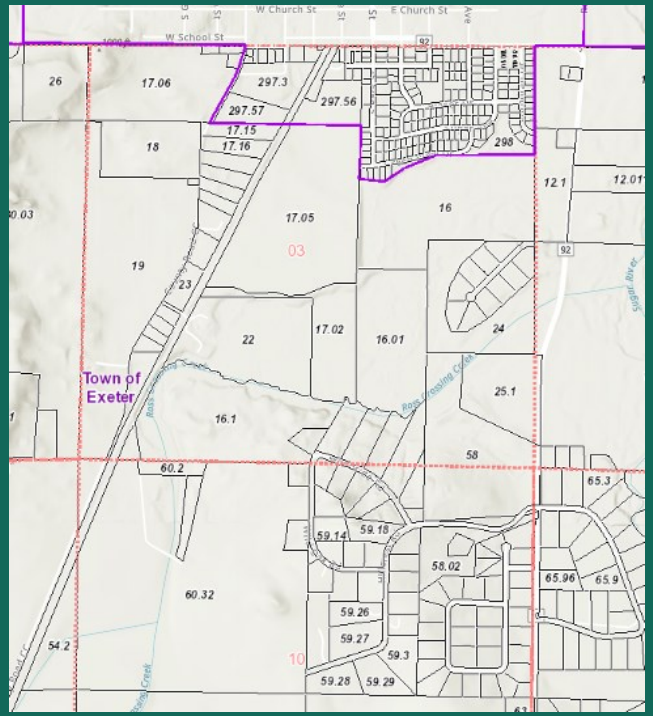
Stratifyx

Dan N. Sullivan and Anne E. Gravel-Sullivan
N9448 County Road CC, Belleville WI 53508

Green County, Town of Exeter

Applied ecology for smarter and faster land use decisions.

Parcel Location



Parcel Information:

Map Parcel No. (Green Co Parcel Viewer)	Parcel No.	Tax Parcel ID No.	Acres/Parcel (Total Acres 96.59)
22	2301400220000	0022.0000	28.9300
NE-SW, Sect.3, T4N, R8E; SE-SW, Sect. 3, T4N, R8E			
PRT E2 SW4 COM 1089 FT N OF 1/8 POST S SD SW4 TH N 1006.5 FT TH E 82.5 FT TH S 198 FT TH E 1326.6 FT TH S 1139.82 FT TH W IN OLD CRK BED POB; ALSO PRT W2 SW4 LYG E OLD HWY RUNNING NLY & SLY THROUGH SD W 1/2 EXC RR ROW, & EXC 12.3A M/L & & EXC 6.28A M/L & EXC LOT 1 CSM 871 & EXC CSM 1285			
17.02	2301400170200	0017.0200	18.0000
SECTION 3 PRT NE4 SW4 & W1/2 SE4 COM W4 COR SD SEC TH S89*E 1728.32 FT TO ETRLY LN RR TH S27*W 705.84 FT POB TH S 88*E 374 FT TH S66*E 159 FT TH N87*E 322 FT TH S75*E 156 FT TH N86*E 181 FT TH N 68*E 367 FT TH N88*E 275.97 FT TH S0*W 1360.05 FT TH 560 FT M/L TO ESTLY LN SW4 TH N0*W 1050 FT M/L TH N89*W 1235.9 FT TH N0*E 103.13 FT TH N27*E 19.37 FT POB			
16.1	2301400161000	0016.1000	43.6000
SECTION 3 PRT SW4 SE4 LYG S OF ROSS CROSSING CRK & W LOT 11 CSM 1832 & W OF W ROW WILD OAK RD DEPICTED CSM 1833; PRT SE4 SW4 LYG S ROSS CROSSING CRK- 48.1A; ALSO PRT SW4 SW4 COM SE COR SW4 SW4 TH W ALG S LN 610.5 FT TO PT 16.5 FT W OF ELY LN OF RD TH N12*W ALG 1 ROD W OF ELY LN SD RD 429.66 FT TO RR ROW TH N22*E 866.58 FT TH S79*E 480 LINKS TO 1/8 LN TH S TO POB EXC CSM 4081 LOT 1			
60.2	2301400602000	0060.2000	3.0600
NE-NW, Sect. 10, T4N, R8E; NW-NW, Sect. 10, T4N, R8E			
PRT NW4 NW4 AND NE4 NW4 COM NW COR SEC 10 TH S89*E 683.34 FT TO POB TH S89*E 818.11 FT TH S16*W 177.12 FT TH N89*W 743.81 FT TH N8*W 172.84 FT TO POB (POS V18-P5)			
60.3	2301400603100	0060.3100	3.0000
NE-NW, Sect. 10, T4N, R8E; NW-NW, Sect. 10, T4N, R8E			
COM NW COR SEC 10 TH S89*E ALG N LN SEC 10 1501.45 FT TH S16*W 177.12 FT TO POB TH S12*W 631.09 FT TH S14*W 396.90 FT TO CTR LN FAHEY ROAD TH N52*W ALG CTR LN 80.08 FT TH NWLY 23.59 ALG CTR LN AND ARC CURVE LEFT RAD 340 FT CHORD N54*W 23.59 FT TH N15*E 169.91 FT TH N6*E 782.28 FT TH S89*E 186.88 FT TO POB			

Parcel Location

Gravel-Sullivan, Anne E: 98 Acres
Green County, WI4 North, 8 East,
Section 3

Parcel Information:

Map Parcel No. (Green Co Parcel Viewer)	Parcel No.	Tax Parcel ID No.	Acres/Parcel (Total Acres 96.59)
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17.02	2301400170200	0017.0200	18.0000
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NE-NW, Sect. 10, T4N, R8E; NW-NW, Sect. 10, T4N, R8E			
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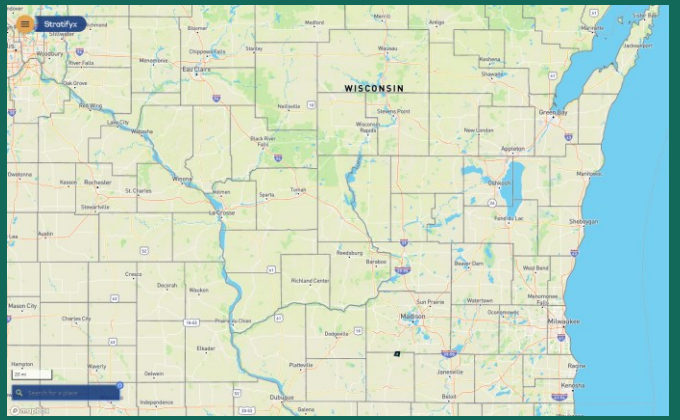
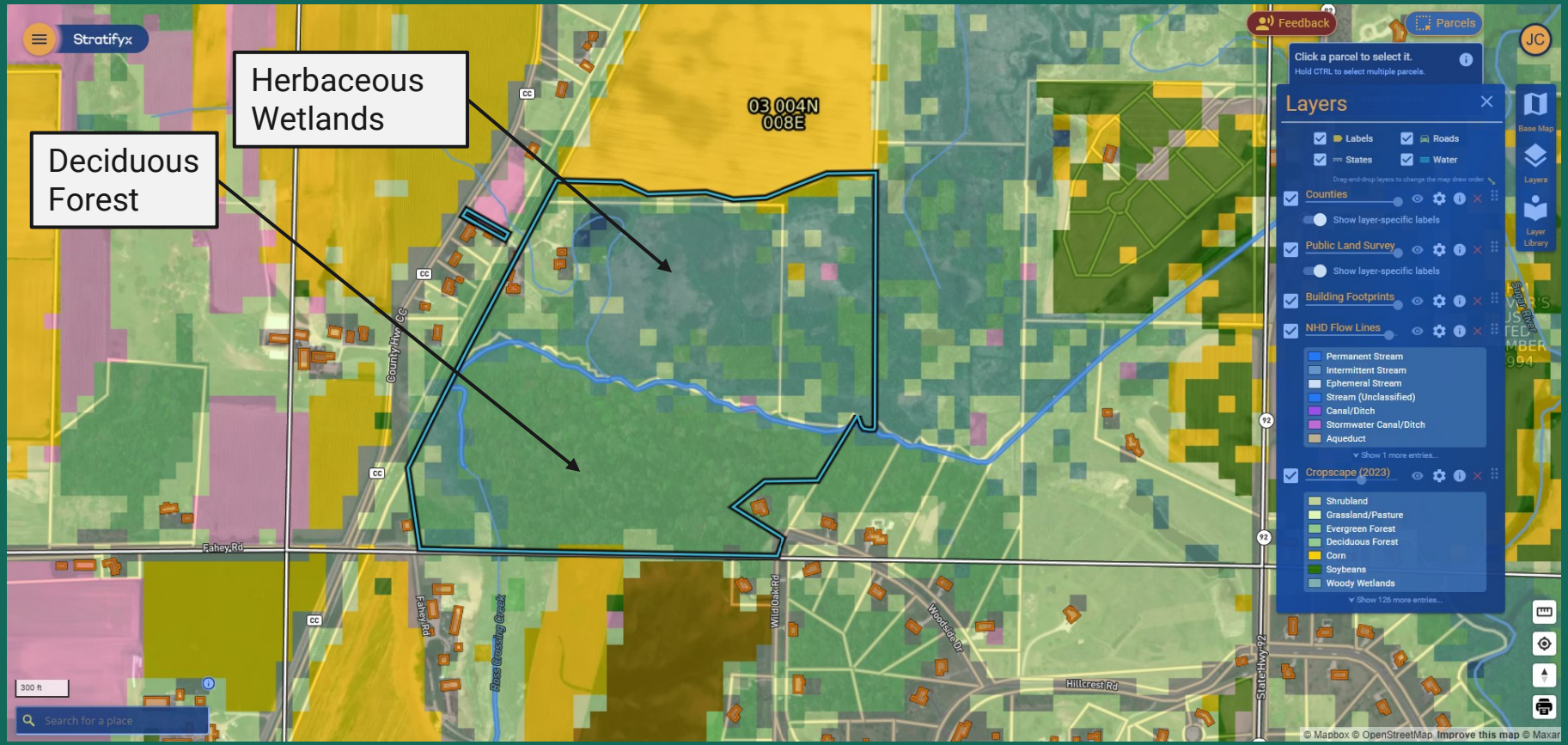
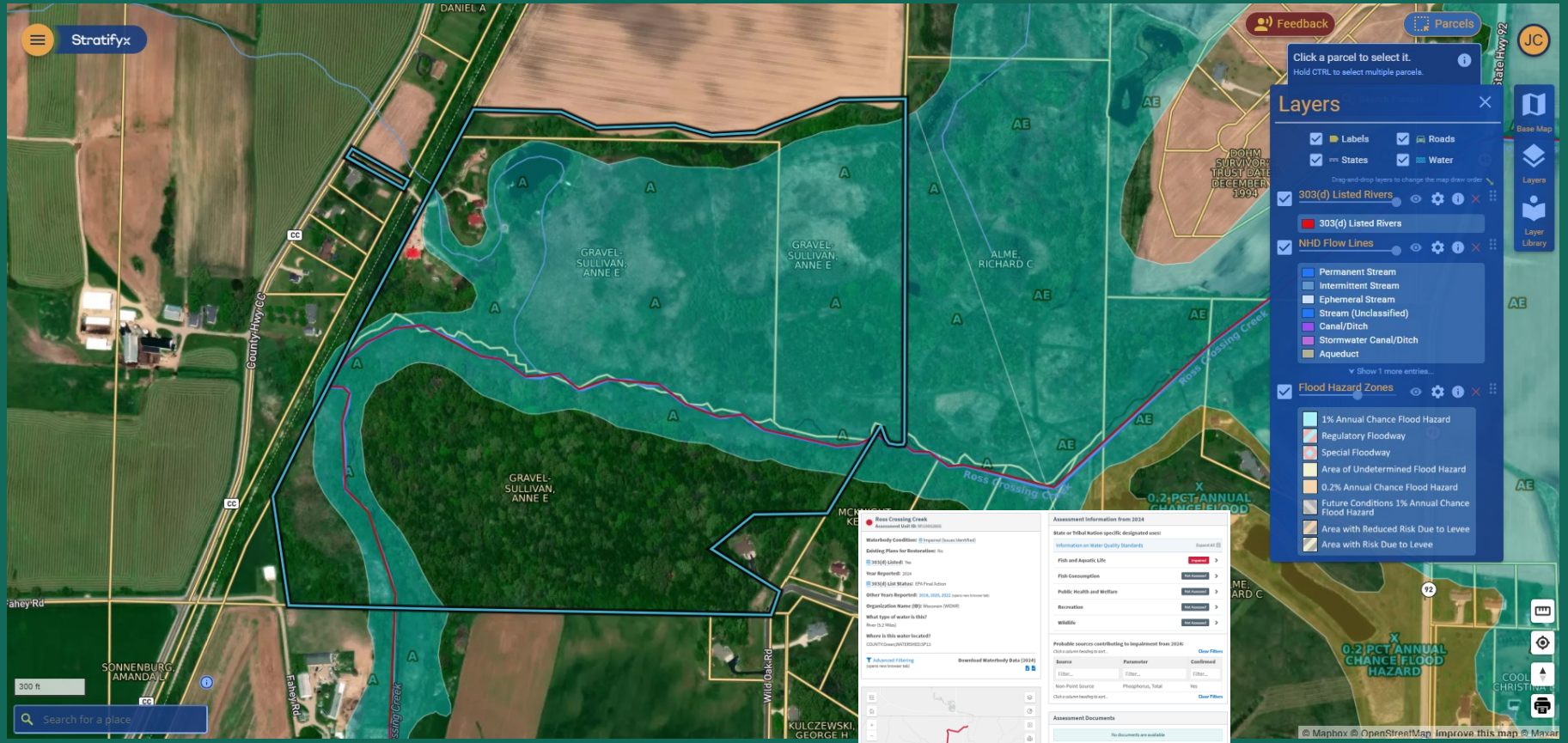


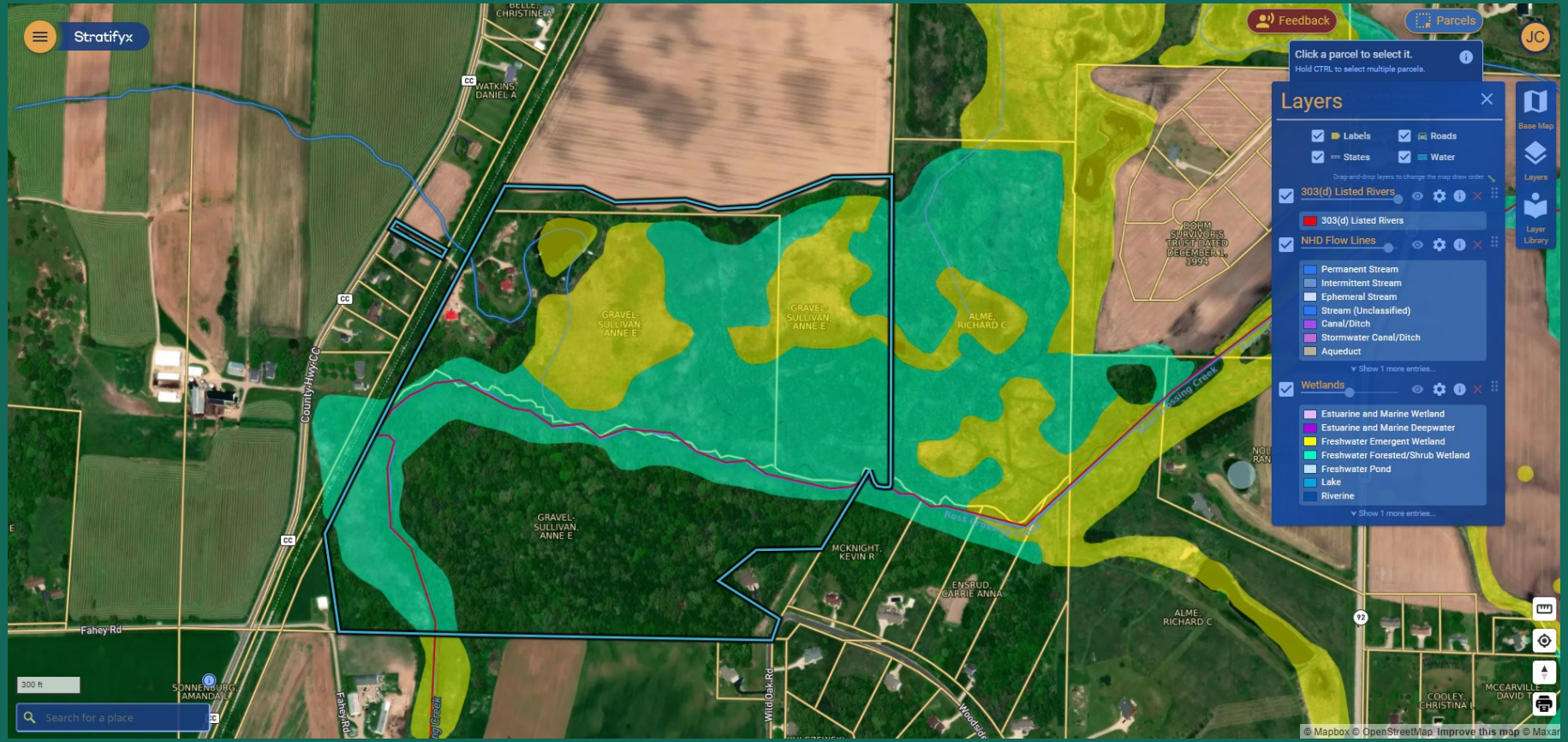
Land Cover



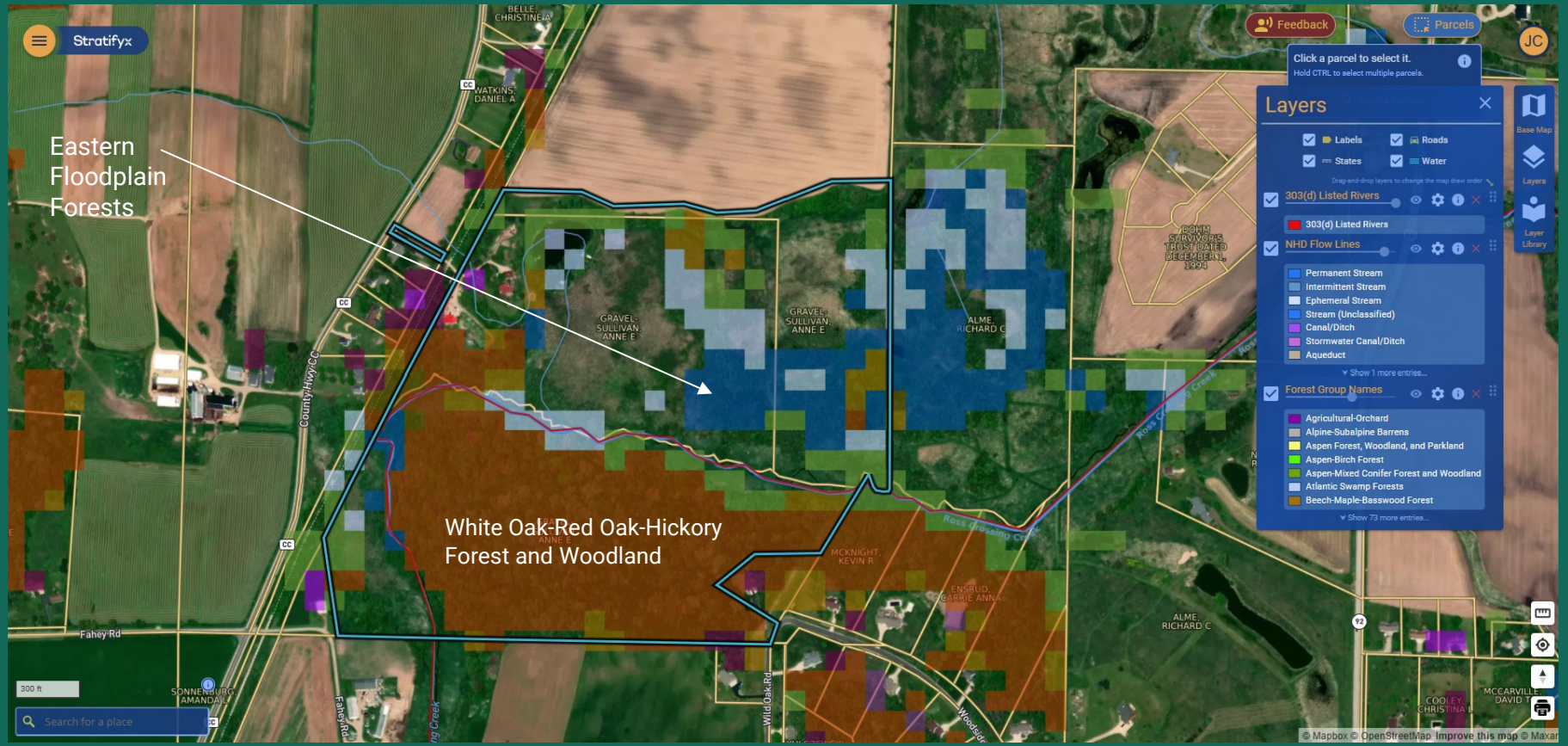
FEMA Floodplain/Floodway/303 List Streams



National Wetlands Inventory



Forest Types



John Elstrott
Founder and Board Chairman
- Emeritus Executive Director, Levy-Rosenblum Institute for Entrepreneurship, Tulane University Freeman School of Business
- Entrepreneur & Investor
- Serves/Served on several public & private corporations as well as non-profit companies ranging from environmental services to retail to consumer-packaged goods

Chris Melançon
Founder and CEO
- Serial Entrepreneur – Successful B2B Software Exit (2000)
- Enterprise Software, Biotechnology, Environmental Technology, Regenerative Agriculture
- Expertise in Engineering, Applied Physics, Biology, & Environmental Science

Steve Apfelbaum
Founder and Chief Science Officer
- Founder, *Applied Ecological Services*, global ecological restoration firm
- Developed hundreds of processes & ecological IP, executing on thousands of consulting & restoration projects.
- Pioneered the U.S. conservation finance segment, including wetland banking, nutrient trading, carbon sales, & conservation easements.

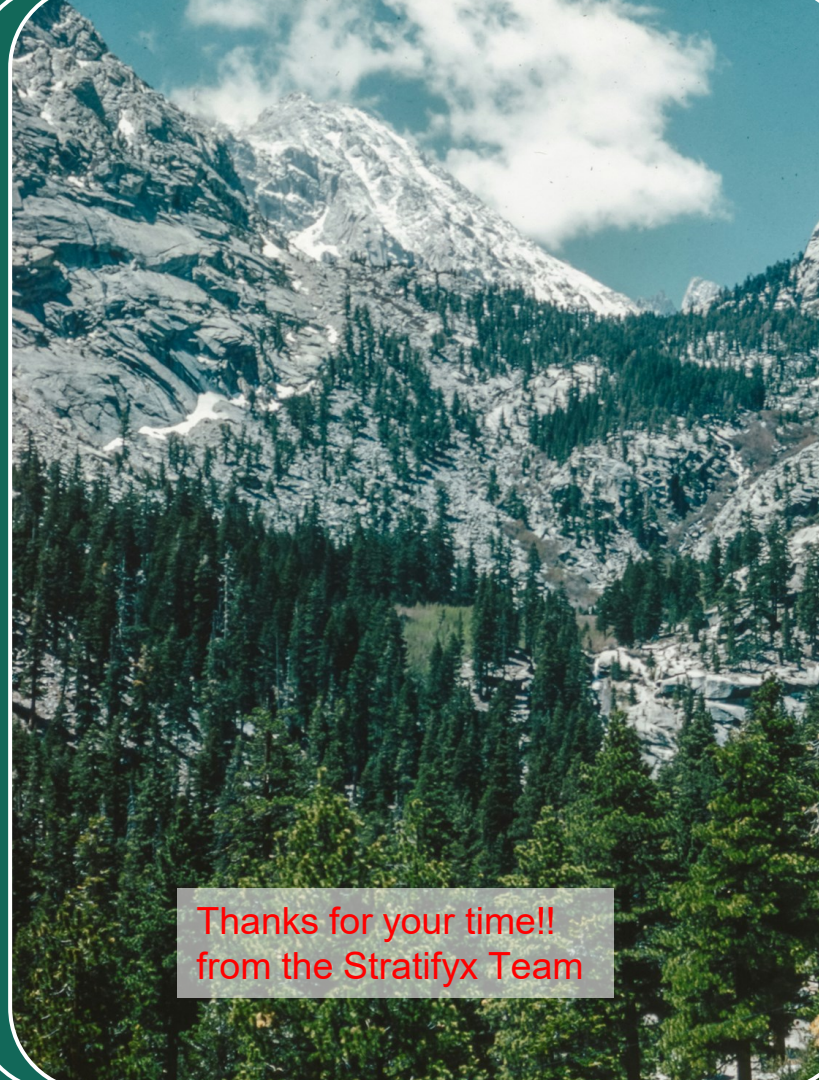
Jason Carlson
Founder and VP of Product
- Leader with 25 years in geospatial science-based tool development
- Deep domain expertise applying technology to ecological restoration
- Lead designer & architect of the Stratifyx SaaS Platform

Sara Clow
Founder and VP of Strategy & Partnerships
- Food, ag, & natural systems entrepreneur & leader with 25 years of experience
- Former Managing Director, *Applied Ecological Institute*, nature-tech venture studio
- Founder/Co Founder, *GrowFood Carolina* & the *Eastern Food Hub Collaborative*

To Partner with Nature,
invest in nature.

Jason Carlson, VP Product
Jason@stratifyx.com
608.558.1002
Stratifyx.com

Stratifyx



MEMORANDUM

TO: Village of Belleville, WI
FROM: Steven I. Apfelbaum, Applied Ecological Institute, Inc. (Brodhead, WI), and Stratifyx
DATE: May 11, 2025
RE: Natural Resources Assessment and Development Alternatives for the Sullivan Property and Parcel 17.05

EXECUTIVE SUMMARY

The Sullivan property and neighboring parcel 17.05 (proposed for conventional development) represent a critical ecological junction containing valuable wetland systems, floodplain forests, and Ross's Crossing Creek—one of the last remaining cold-water trout streams in southern Dane/northern Green County. This memo presents compelling ecological and economic reasons to pursue a nature-based development approach rather than conventional development, supported by successful case studies from across the Midwest.

1. THE ECOLOGICAL SIGNIFICANCE

As shown in our analysis, the Sullivan property (98 acres in Green County, T4N, R8E, Section 3) contains:

- **Diverse Natural Systems:** Deciduous forest transitioning to Eastern floodplain forests along Ross's Crossing Creek with extensive herbaceous wetlands (Figures 1-3)
- **Critical Water Resources:** The property includes FEMA-designated floodplain and floodway areas with 303-listed streams that require protection (Figure 4)
- **Significant Wetland Habitats:** National Wetland Inventory mapping reveals extensive freshwater emergent, forested, and shrub-dominated wetlands that are vulnerable to development impacts (Figure 5)
- **Sensitive Forest Resources:** White Oak-Red Oak-Hickory forest transitions to Eastern floodplain forests that are particularly susceptible to hydrological changes (Figure 6)

Ross's Crossing Creek and the Sugar River are already listed as impaired for aquatic life by both US EPA and Wisconsin DNR. The conventional development of parcel 17.05—currently agricultural land that has been predominantly used for corn production for 15 years—threatens to exacerbate these impairments through increased stormwater runoff, altered hydrology, and additional nutrient loading.

2. THE ECONOMIC CASE FOR NATURE-BASED DEVELOPMENT

2.1 Reduced Infrastructure Costs

Conservation developments with nature-based stormwater solutions deliver significant cost savings:

- **Prairie Crossing (Grayslake, IL):** Saved $2.7 million in initial infrastructure costs by eliminating storm sewers and retention ponds, representing a 33% reduction in upfront development costs
- **Fields of St. Croix (Lake Elmo, MN):** Reduced infrastructure costs by $5,000 per lot through natural drainage systems and reduced impervious surfaces
- **Coffee Creek Center (Chesterton, IN):** Saved approximately $1.5 million in stormwater infrastructure through restored wetlands and vegetated buffers

Nature-based solutions replace expensive buried infrastructure with vegetated buffers where stormwater is held, infiltrated, and naturally cleansed. These systems typically cost 40-60% less to maintain annually compared to conventional stormwater systems.

2.2 Higher Property Values and Faster Sales

Conservation developments consistently outperform conventional subdivisions:

- **Conservation Communities Study (2012):** Analysis of 140 conservation developments nationwide showed homes sell for 12-16% higher premiums than comparable conventional developments
- **Prairie Crossing:** Achieved 30% price premiums compared to nearby conventional developments
- **Dodson Hill (Kettle Moraine, WI):** Lots sold in half the time of conventional developments in the same market, with 15-22% higher property values

2.3 Reduced Municipal Maintenance Costs

Villages and towns face mounting infrastructure maintenance costs that are rarely covered by impact fees:

- **National Infrastructure Study (Urban Land Institute, 2023):** Municipalities underfund stormwater infrastructure maintenance by 35-42% on average
- **Madison, WI (2022):** Retrofitted neighborhoods with nature-based solutions reduced annual maintenance costs by $217,000 across 120 acres
- **American Society of Civil Engineers:** Traditional buried stormwater systems have a 30-40 year lifespan requiring $15,000-$30,000/acre in replacement costs, compared to 50+ year lifespans for vegetated systems with $3,000-$7,000/acre replacement costs

3. SUCCESSFUL REGIONAL MODELS

3.1 Prairie Crossing (Grayslake, IL)

This 677-acre development preserved 470 acres (69%) as open space while achieving the same number of housing units as originally zoned:

- Eliminated detention ponds and storm sewers, replacing them with prairie swales and wetlands
- Created 10 miles of trails connecting to regional greenways
- Average residence time of 14+ years (vs. national average of 2-3 years in conventional developments)
- Agricultural land preserved as working organic farm (Prairie Crossing Farm) supplying local markets
- School test scores 27% higher than district average, attributed partially to outdoor learning opportunities

3.2 Token Creek Restoration (Madison/Sun Prairie, WI)

- Development along Token Creek implemented 200-foot vegetated buffers
- Water temperature decreased by 3.2°F after buffer installation
- Trout populations increased 165% within 5 years
- Property values increased 18-22% for homes adjacent to the restored creek corridor

3.3 The Sanctuary (Oconomowoc, WI)

- 40% of the site preserved as natural areas with smaller lot sizes
- Stormwater directed to restored wetlands and infiltration basins
- Eliminated $1.2 million in conventional stormwater infrastructure
- Homes sold 2.4 times faster than market average
- Rosenow Creek water quality improved from Class II to Class I trout stream

4. VALUE PROPOSITION FOR BELLEVILLE

4.1 For the Village

- **Lower long-term maintenance costs:** Reduce municipal infrastructure burden by $15,000-30,000 per acre over 30-year lifespan
- **Enhanced tax base:** Higher property values generate 12-16% more tax revenue
- **Reduced flooding risk:** Properly designed nature-based solutions provide 25-45% greater flood control capacity than conventional systems
- **Community asset creation:** Create a recreational amenity with trails connecting to regional systems
- **Educational resource:** Provide an outdoor laboratory for Belleville schools
- **Environmental leadership:** Position Belleville as a leader in sustainable development within the region

4.2 For the Developer

- **Density bonuses:** Allow higher density in exchange for preserved open space
- **Lower construction costs:** Save 25-40% on infrastructure installation
- **Marketing advantage:** Conservation developments sell faster and at premium prices
- **Reduced approval risk:** Address community environmental concerns proactively
- **Streamlined permitting:** Simplified approval process for environmentally sensitive design

4.3 For the Sullivan Property and Ross's Crossing Creek

The Sullivan property and Ross's Crossing Creek together represent an irreplaceable community asset that should be honored and integrated into a revised community master plan. A nature-based development approach would:

- Protect one of the last remaining cold-water trout streams in the region
- Create a continuous open space network connecting existing natural areas
- Transform the floodplain from a liability into a community amenity
- Provide educational opportunities for Belleville schools
- Set a precedent for sustainable development in the region

5. RECOMMENDATIONS

1. **Revise development requirements:** Adopt ordinances that encourage conservation development with density bonuses for open space preservation
2. **Require enhanced buffers:** Implement minimum 100-foot vegetated buffers along Ross's Crossing Creek and associated wetlands
3. **Encourage clustered development:** Promote smaller lots with shared open space instead of conventional large-lot subdivision
4. **Consider agricultural preservation:** Evaluate opportunities to maintain portions of the land for small-scale, sustainable food production
5. **Integrate trail systems:** Require development to include trail connections to regional greenways
6. **Implement educational components:** Partner with local schools to develop environmental education programs utilizing the natural areas

6. NEXT STEPS

The village has an opportunity to proactively shape this development by:

1. Meeting with the developer to discuss alternative development approaches
2. Facilitating a community visioning process for the Ross's Crossing Creek corridor
3. Connecting the developer with successful conservation development practitioners
4. Reviewing zoning and development requirements to remove barriers to nature-based solutions
5. Exploring funding opportunities for conservation easements or land acquisition of critical areas

CONCLUSION

The conservation development approach represents a triple-win solution for Belleville, providing ecological benefits, economic advantages, and enhanced community amenities. By protecting and incorporating the natural systems of the Sullivan property and parcel 17.05 into development plans, Belleville can create a lasting legacy that honors the land while providing long-term value to residents.

We would be happy to facilitate connections with municipalities, developers, and planning professionals who have successfully implemented these approaches in Wisconsin and throughout the Midwest.

Respectfully submitted,

Steven I. Apfelbaum***, Senior Ecologist, Retired CEO, Applied Ecological Services, Inc.
Applied Ecological Institute, Inc.
Stratifyx

*** Professional Resume attached hereto, for reference to conservation development publications.

Sept 10, 2025 - Anne Sullivan

(Note: The Water System Study for the Village of Belleville (dated July 2025), which was provided as an attached with this comment, has been omitted from this report for the sake of brevity and due to potentially sensitive information. Please contact the Village of Belleville directly if you would like to request a copy for review.)

Outlook

Testimony - 9/11/25 Village of Belleville

From Anne Gravel Sullivan <gravelsulliv@wisc.edu>
Date Wed 9/10/2025 4:15 PM
To Matthew Kozlowski <MatthewKoz@capitalarearpc.org>

2 attachments (7 MB)
00372120 Belleville Water System Study Report_2025.07.30 (1).pdf; CARPC Letter Sullivan 091025.pdf;

Hi, Matt-

Attached please find a letter of testimony from my husband and I for tomorrow's CARPC meeting.

I do plan to give very brief oral testimony as well but we wanted to make sure this fuller version with data made it to the Commission.

If you could please confirm receipt of the letter and MSA Water System Report attachment (I include this because this resource had been taken down from the link I embedded in the letter a few days ago), I would appreciate it.

Please let me know if you have any questions.

Thank you,

Anne

Anne Gravel Sullivan, PhD

She/Her/Hers

Associate Director of Research Translation and Implementation

Dissemination and Implementation Launchpad and Learning Health Systems

UW Institute for Clinical and Translational Research (ICTR)

University of Wisconsin-Madison School of Medicine and Public Health

4245 Health Sciences Learning Center

608.265.5423

gravelsulliv@wisc.edu | https://ictr.wisc.edu/

To the Members of the Capitol Area Regional Planning Commission:

We submit this testimony on the Badger Trails subdivision in Belleville and the Village's role in its approval. We own 96 acres of rural property that includes restored wetlands immediately south of the proposed development, on which we will have a conservation easement by the end of the year. When the Village moved to annex this Town of Exeter property last winter, we requested to meet with the developer, but he refused. In our one meeting on June 9 with the Village Administrator and Board President, there was some receptivity to a conservation-based design, but fear of litigation kept it from reaching the Village Board. From the start, staff have prioritized the developer's interests over those of Belleville's citizens and adjacent landowners. Most recently, the Village administration placed the Phase I plat on the September 10 Plan Commission agenda at the last minute, leaving little citizens little time to prepare to attend and contribute to a discussion. Despite our early good-faith efforts, neither we nor other landowners were informed of our right to use the protest ordinance during annexation or rezoning. This could have required negotiation toward a conservation-based design without reducing the developer's profit. We and other adjacent landowners have consistently stated that our aim is not to block development, but to ensure it proceeds in a way that protects citizens and the environment.

<u>Ongoing Concerns</u>

1. **Environmental and Wetland Protection**
   Over four decades we have restored 96 acres of wetlands, woodlands, and agricultural land adjoining the proposed development. The Wisconsin DNR recognized the high quality of the wetland immediately adjacent to the proposed development and performed a site visit in 2021, documenting its plant life. The Ross Crossing creek that runs through our property is, in addition, recognized by the WDNR as an Exceptional Resource Water (ERW) and harbors trout, along with the redfin shiner, a fish on the Wisconsin Watch list.

   Unfortunately, the Village favors conventional retention ponds instead of soil- and hydrology-based infiltration methods. Without stronger stormwater easements and scientifically grounded mitigation, these restored wetlands face contamination, thermal pollution and long-term degradation. Together with the Southern Wisconsin Land Conservancy, we have installed test sites to monitor flow, water quality, and temperature, and we will continue collecting and sharing data with the Village/MSA, DNR, and other agencies to ensure accountability.

   We have significant concerns over who will be responsible for monitoring and maintaining the water management system (e.g. detention ponds). We ask CARPC to ensure that a responsible body (not a homeowners association) and scientific data guides monitoring and maintenance of the subdivision's water system.

   Finally, we believe that our partnership with the Upper Sugar River Watershed Association to establish a coalition of organizations, property owners, and other stakeholders may also help increase local accountability for responsible stewardship of the middle Sugar River watershed

that runs through Southern Dane County, Northern Green County—and right through the heart of Belleville.

2. **Inaccurate and Incomplete Data**
   The original subdivision application submitted to the Village contained serious inaccuracies about traffic, public safety, schools, sewer, and environmental impacts. In addition, there are omissions in the Village's report before the Commission, including the results of a water study (see attached) conducted over the summer by MSA. Village management has failed to reconcile these errors with the well-documented data submitted by citizens as evidence contrary to the developer's claims, nor has it incorporated the findings of MSA's 2025 water and sewer management report into its own submission to CARPC. This omission undermines the integrity of the review process.

3. **Density, Safety, and Infrastructure Risks**
   Two modest concessions were made between the original plat proposed for the Badger Trails subdivision submitted March 29, 2025 by Joshua Petry/White Oaks Development. For example, citizens petitioned for and the developer agreed to a 20' greenspace buffer along the North, East and South sides of the development. However, the current plan reduces lots by less than 20% (from the original 248 to 203), leaving over 200 homes on approximately 60 acres. Constrained by the Badger State Trail to its West, the development will have only two streets feeding into a single residential one (Park Street), increasing traffic exponentially along that single street corridor not designed for heavy traffic. The addition of these houses will generate by a conservative estimate at least 1,800 additional vehicle trips daily in a village of 2,800—creating major safety hazards at Belleville's already congested intersections. **Fire and emergency access remain unresolved, and local services—sewer, water, schools and infrastructure already at capacity—will be further strained. The August 2025 MSA water system study shows several insufficiencies in Belleville's water supply and storage, particularly for emergency events.** Without requiring the developer to bear these costs, citizens will be left to subsidize an unsustainable plan for village growth.

4. **Deficits in Legal Understanding and Commitment**
   We have little confidence in the Village's understanding of its legal obligations and no confidence in its willingness to fulfill them. Rezoning and plat approvals have been marred by incompetence, misinformation, and intimidation of newly seated board members. Citizens' and adjacent landowners' input has been minimized throughout, eroding trust and legitimacy.

5. **Failure to Educate and Lead**
   The Village has failed to adequately educate its own board members, staff, or the public on ordinances and development processes. Instead, officials have consistently defended the developer's interests over those of Belleville's citizens. This abdication of responsibility underscores the need for CARPC to apply the transparency, rigor, and standards missing at the municipal level.

Conclusion

The Badger Trails subdivision, as advanced by the Village, threatens both environmental integrity

and community well-being. We urge CARPC to ensure that conservation science, accurate data, legal responsibility, and meaningful citizen engagement—not expedience or intimidation—guide decisions in this sensitive ecological corridor. In particular, we ask CARPC to require clarity on **who will monitor and maintain the subdivision's water management systems**, and to ensure that **scientific data governs their long-term operation** so that Belleville's citizens and its environment are not left bearing the cost of failure.

Sincerely,

Dan Sullivan and Anne Gravel Sullivan

Sept 11, 2025 - John Stremikis

Outlook

Testimony for the Record – Belleville "Badger Trails" Amendment (Sept 11, 2025)

From John Stremikis <jrstremi@wisc.edu>
Date Thu 9/11/2025 12:16 PM
To Info <info@capitalarearpc.org>
Cc John Stremikis <jrstremi@wisc.edu>

1 attachment (38 KB)
Belleville_Dossier_UPDATED_2025.pdf;

Subject: Testimony for the Record – Belleville "Badger Trails" Amendment (Sept 11, 2025)

Hello CARPC Commissioners and Staff,

Please accept the attached testimony and reference packet for inclusion in the official record of tonight's public hearing on the proposed amendment of the Dane County Water Quality Plan (Belleville Urban Service Area / "Badger Trails").

If time and technology permit, I will also offer brief oral comments during the hearing. The comments are contained here, below.

Attachments:

-
-

Thank you for entering these materials into the record.

Sincerely,

John R. Stremikis

Belleville resident; Drift’s Edge Nature Conservancy supporter

[608 220-0867] • [jrstremi@wisc.edu]

————————————————< oral remarks if time >
_____

Chair, Commissioners, neighbors, my name is John R. Stremikis.

I speak tonight as a resident and as someone who has lived through the long arc — the longue durée — of Belleville’s environmental struggles.

I remember the Union Co-op corridor when fertilizer trucks rattled past homes, when herbicides and pesticides were mixed and stored in the old depot, when neighborhood children played in soil we now know was contaminated. We spent years in the 1980s fighting — with environmental lawyers, with UW–Extension allies — for transparency and accountability. And yet, it still took until the 2020s to scrape and haul away polluted soils. The costs were massive, borne not by those who profited, but by residents and taxpayers.

The Cosgrove development repeated the pattern: handshake deals, under-sized sewers, costs shifted to elders and neighbors after the fact. The lesson is painfully clear: when approvals are rushed, when

contamination is hidden, when easements are promised but not recorded, the people of Belleville pay the price — in dollars, in health, in trust.

This amendment before you risks tearing at the very threads we have fought to mend. The Badger Trails project sits on land farmed with atrazine, 2-4-D, and Roundup for decades. Yet we see no chemical mapping, no Phase I or II assessments, no commitments to independent testing. We see "no objections to date" as if our lived memory does not count. But it does. The health of our pets, our children, our veterans — those exposed then and still today — is testimony enough.

Therefore, I ask that the Commission:

1. **Condition any approval** on full environmental testing (soil, groundwater, wells).
2. **Require independent engineering review** of sewer and stormwater plans, with financial bonds to protect residents.
3. **Mandate recorded easements** for trails, buffers, and corridors — no more handshake promises.

Establish a public Right-to-Know repository where Belleville residents can access contamination history, testing data, and monitoring reports.

4. I further request that the Commission condition its approval on the inclusion of independent Phase I and II Environmental Assessments, disclosure of prior contamination, and permanent recordation of trail and corridor easements.

Finally, I request that my remarks and the attached supporting documents -- the Cosgrove to Badger Trails Risk Dossier, any Drift's Edge Citizen Handout(s), and the Environmental History Dossier -- be included in the record of this hearing.

We owe it to the memory of those residents who fought in the 1980s, to the residents still living with consequences. We owe it to future generations. We owe it to pet owners who lost and still lose their dogs to cancers or environmental factors long before their time. Such wounds never close.

Belleville deserves growth that heals, not wounds that never close.

Thank you.

John R. Stremikis

Vietnam Veteran, Pet Owner, Trail Walker

jrstremi@wisc.edu - 608 220-0867 /

Executive Summary

This updated dossier provides a comprehensive examination of Belleville's environmental history, agricultural chemical legacy, archaeological context, and planning challenges from the Union Co-op corridor through the Cosgrove development and now into the Badger Trails proposal.

It integrates archival memory, archaeological research, legal updates, and community testimony frameworks.

Timeline of Environmental and Archaeological Context

• **1960s–1980s**: Union Co-op fertilizer and pesticide storage and mixing in the depot corridor. Community protests emerge.
• **1980**s: Legal interventions (Whyte & Hoerschbach), UW-Extension advocacy, environmental testing.
• **1990s–2000s**: Lake Belle View restoration, Sugar River berm trail established.
• **2010**s: Continued monitoring of atrazine, 2,4-D, Roundup use in surrounding farmlands.
• **2020**s: Soil remediation at depot site, Badger Trails development proposed without new chemical mapping.
• **Archaeological continuum**: Indigenous mounds (Dupont, Dane Co.), Woodland period sites, geophysical surveys reveal lost landscapes.

Thematic Essays

Agricultural Chemicals & Health

Atrazine, 2-4-D, glyphosate (Roundup), and legacy DDT applications continue to affect soil and groundwater.

Pets in Belleville show increased urinary issues;

Veterans' exposure recalls PACT Act presumptions.

Archaeological Continuity
Geophysical surveys (magnetometry, resistivity, drone mapping) reveal leveled mound groups near Belleville.
The Wisconsin Archeological Society and UW fieldwork (Dupont Mound excavation) demonstrate both heritage and the destruction of sites through agricultural development.

The Wisconsin Idea & Conservation
Public service archaeology and UW-Extension environmental advocacy form part of Wisconsin's tradition.

This dossier grounds Belleville's story in that wider institutional legacy.

Cosgrove to Badger Trails Lessons
Cosgrove's failed sewer oversight left residents paying hidden costs. Today, Badger Trails risks repeating those mistakes unless CARPC and the Village insist on independent testing, financial bonding, and transparency.

Comparative Tables

Then vs. Now**
Union Co-op secrecy → Drift's Edge transparency

Handshake vs. Recorded Easements**
Oliver Trail verbal promises → Need for platted, permanent easements

Regulatory Gaps vs. Needed Reforms**
No Phase I/II testing → Mandated environmental assessments before approvals

Sample Testimony – Parks & Arborist
The health of the trees, the effects of herbicides, ecological planning for trails and buffers along Park Street, ingress and egress into new development from Old Belleville, the impact on current Old Belleville residents, the integration of long-term health and environmental impact, urban design factors, the integration of economic development, and strategic planning documents.

References

References**
- Cosgrove → Badger Trails Risk & Responsibility Dossier (2025).
- Drift's Edge Citizen Handout (2025).
- Wisconsin Archeological Society. *Excavation of the Dupont Mound, Dane County*.
- Geophysical Survey and Remote Sensing at Gast Farm.
- High Resolution Mapping and Geophysical Studies of Midwestern Mounds.
- Prehistoric Woodland Peoples in the Upper Midwest.
- Burial Sites Legislative Update (2017).
- "The Wisconsin Idea and the Golden Age" archival paper.

October 7, 2025 - Anne Sullivan

October 7, 2025

N9448 County Hwy CC
Belleville, WI 53508

Capitol Area Regional Planning Commission
100 State St, Suite 400
Madison, WI 53703-2573

Dear Commissioners,

Thank you for convening a meeting between the Village of Belleville, Jeff Linkenheld, Designer for White Oaks Construction, and ourselves as property owners adjacent to the Badger Trails development. We are grateful for the opportunity to share the scientific expertise and evidence-based recommendations of the Southern Wisconsin Land Conservancy, the land trust non-profit organization to which we are entrusting our conservation easement. These are detailed in the attached property Term Sheet, which includes requirements for stormwater management performance and monitoring, as well as for vegetation buffer and setback monitoring and management.

We are very pleased to see that the State's and local Water Quality Monitoring requirements and recommendations align closely with those of the SWLC, with the exception of requiring performance bonding to support monitoring and ensure performance rather than perfunctory installation. The question remains: what will be done if the design and implementation fail to work according to requirements? A performance compliance bond must be in place should a need arise to invoke a call on the bond--otherwise, there is no recourse outside of litigation if the village or developer falls out of compliance. In addition, we believe that recommendation #3, the removal and control of invasive species along the exterior perimeter of the development site is essential to preventing their spread to our property immediately adjacent to it.

Please let us know if you have any questions about the attached property Term Sheet, authored by SWLC's President Steve Apfelbaum. We look forward to our conversation on Wednesday, October 8th at 11 am.

Best regards,

Anne Gravel Sullivan
Dan N. Sullivan

SOUTHERN WISCONSIN LAND CONSERVANCY

protecting wild and working lands

To: Capital Area Regional Planning Commission
From: Steve Apfelbaum, Southern Wisconsin Land Conservancy
Date: September 23, 2025
Subject: Sullivan Term Sheet for Zoning Negotiations

1. **Stormwater Management Performance:**

   Performance Requirements and Goals as measured in Sullivan property wetlands. Pond and stream:
   Goals: Commit full funding from design through ten years of management and monitoring funded through performance bond funds held by the Drift's Edge Nature Conservancy (DENC) or Applied Ecological Institute (AEI), a local nonprofit conservation organization, to pay for the expertise and comprehensive follow-through on the development property to install, manage and maintain the stormwater management systems in in the entire development, including along the development frontage along Badger Trail and the entire Sullivan property.

   A. 100% of surface water generated from development property up to and including the 10-year type II, 24-hour storm event shall be infiltrated annually, throughout each season of the year, each year from the entire development.
   B. If the Developer chooses to accomplish 1A. then they must do on site 2-year Type II, 24-hour storm event management in vegetated upland treatment such as bioswales, wetland biofilters prior to the water entering a detention pond or being infiltrated.
   C. No surface water runoff into Sullivan property
   D. No detention or retention pond discharge shall enter as surface or subsurface ground water discharge unless it is cleaned
   E. No change in ground water seepage performance in Sullivan property
   F. No change in water chemistry in ground or surface waters in Sullivan property

   Measurement and Annual reporting Requirements by Developer/City

   A. Retain independent third-party team to install 6 more recording piezometers in the Sullivan wetlands on two more parallel transects from north to south mirroring the existing already installed 3 piezometers in the wetland.
   B. Install up to 6 recording piezometers on the Development that extend the north-south transect containing piezometers that already exists in the Sullivan property.
   C. Document quarterly water level dynamics, water chemistry, and water temperature in surface and all piezometers. The water level dynamics, water chemistry and water temperatures from before to after development, including during the construction of the development must not differ by > 10% for each of these variables.

Compliance

A. Quarterly and annual raw data (provided in excel) and technical reports shall be provided to Sullivans, County, Municipality by the tenth day of each renewed quarter, and,
B. If the Sullivan property water level dynamics of ground (and surface waters), water quality or water temperature exceeds > 10% deviation from before, during and after construction by use of the Sullivan piezometers (and other piezometers installed to meet the Sullivan units as reference standards) then the developer, city and county will be notified by experts retained by the County, Sullivans, Municipality of the non-compliant stormwater management program in the development.
C. A formal letter of non-compliance will be issued by the City and County to the developer, and this will trigger a 45-day period for the developer to provide a remedy, that must be implemented within 90 days.
D. If the Sullivan property water level dynamics of ground (and surface waters), water quality or water temperature exceeds > 10% deviation from before, during and after construction by use of the Sullivan piezometers (and other piezometers installed to meet the Sullivan units as reference standards) then the acceptable remedies must be focused in the following categorical remedies to achieve remediation and compliance resolution:

Remediation and Non-Compliance Resolution

A. Require lawn fertilizers use to focus on organic slow-release Osmocote types.
B. Lawn clippings shall be collected at a community compost facility far removed from the property border area.
C. Additional stormwater management controls including expanded native landscaping and reduced lawns shall be introduced in common areas, ROW verges, and the development shall expand its buffer of native prairie vegetation bordering the Sullivans property
D. Detention ponds shall be shallowed and converted into wetland biofilters
E. On-road absorbent collars shall be installed around every storm sewer inlet throughout the development. Said absorbent collars shall be changed out quarterly to maintain their absorptive capacity so they continue to improve water quality.
F. If Non-compliance persists, the City (and Developer) shall allocate development impact funds to cover the costs for management and restoration of the Sullivan wetlands and stream. This will become a perpetual fund that is paid out annually in an amount not to exceed to market value of restoration and management costs from competing bids from ecological restoration service providers in the regional market.
G. Costs covered would be complete and comprehensive operational costs to address invasive species control, monitoring of the vegetation, water quality, and piezometers and annual reporting, replanting of native vegetation, if salt or other related contaminants result in deleterious impacts on the Sullivan wetlands and stream.

2. **Vegetation Buffers, Setbacks, and their Monitoring and Management**

Goals: Commit full funding from design through ten years of management and monitoring through annually reduced performance bond funds held either by DENC or AEI, a local nonprofit conservation organization, to pay for the expertise and comprehensive follow-through on the development property to install, manage and maintain a native prairie planting buffer systems of no less than 100' width around the entire development, including along the development frontage along Badger trail and the entire Sullivan property.

A. Have professionally designed, site preparation, installation of local genotype seed and plugs for 75 to 125 native dry, mesic and wet prairie plant species, using state of the art restoration practices and having the restoration contractor working with the developer meet to coordinate vegetation system design, management, maintenance and annual monitoring across property lines.
B. Conduct all required planning in concert with the Sullivans' restoration team.
C. Conduct all required site preparation, seed/plant procurement, planting and site management in complete coordination with the Sullivans' restoration and conservation team.

Compliance

A. Year 1, before development activities occur, execute the plantings of said buffer plantings.
B. Years 2-10, conduct necessary weed management, monitoring, and reporting
C. Annually, provide annual performance report that documents species, cover, frequency of native and nonnative plant species, and bare soil present in the buffer planting zone(s).
D. Annually, meet during years 1-5 with the Sullivans restoration and conservation team to examine monitoring results and walk the site to develop concurrence on management, maintenance and remedial planting needs.
E. Meet by year 5; dominance (10% average quadrat coverage) by a minimum of 20 native perennial prairie plant species.
F. Meet by year 5; no nonnative species with >10% average quadrat coverage in > 75% of the sampled locations.
G. In no location will there be = or >100 square feet of bare soil.

Non-Compliance Resolution

A. Non-compliance letter from City, Sullivans, County to Developer, and HOA will trigger a 45-day remedial planning period by the Developer, City, HOA.
B. A remedial plan to address the prairie buffer planting shortfalls shall be prepared and submitted to all parties by day 45 after the notice of non-compliance.
C. The remedial plans shall be professionally designed, site preparation, installation of local genotype seed and plugs for 75 to 125 native dry, mesic and wet prairie plant species, using state of the art restoration practices and having the restoration contractor working with the Developer meet to coordinate vegetation system design, management, maintenance and annual monitoring across property lines.
D. Conduct all required planning in concert with the Sullivans restoration team.

E. Conduct all required site preparation, seed/plant procurement, planting and site management in complete coordination with the Sullivan restoration and conservation team.
F. Document all remedial efforts in quarterly reports shared with all parties.
G. If Non-compliance persists, the City (and Developer) shall allocate development impact funds to cover the costs for management and restoration of the Prairie buffer to meet the performance requirements. This will become a perpetual fund that is paid out annually in an amount not to exceed to market value of restoration and management costs from competing bids to meet the remedial requirements from ecological restoration service providers in the regional market.
H. Costs covered would be complete and comprehensive operational costs to address invasive species control, monitoring of the vegetation and annual reporting, replanting of native vegetation.

October 7, 2025 - John Stremikis

Statement for the Record — (WQML #2503 Integrated)

Belleville Badger Trails / CARPC Meeting — 8 October 2025

Submitted by: John R. Stremikis, Resident, Old Belleville / North Park Street Corridor

Introduction and Context

Since the preparation of my initial statement, the Capital Area Regional Planning Commission released its Draft Water Quality Management Letter (#2503, dated October 9, 2025). The letter affirms consistency with state water-quality standards and, crucially, recommends a Phase I archaeological survey prior to any ground disturbance. It also endorses enhanced infiltration, temperature-control, and habitat measures for the Sugar River corridor. These findings validate the community's call for transparency and lawful stewardship under NR 716 and §157.70, and they provide a practical roadmap for implementation by the Village and development team.

Why I'm Here

I live across the street from what is now The Yards. I have watched this ground change—from cornfields and arrowhead sites to rail lines, to the fertilizer, pesticide and herbicide storage and mixing, and propane operations of the old Union Co-op, and finally to the redevelopment that stands there today. I am here as a neighbor and witness—seeking not delay, but diligence—so our next steps, especially with the Badger Trails project, are guided by memory, law, and care.

Context and Continuity

Belleville has moved through cycles of promise, harm, and repair: cleaning a polluted lake; restoring trust after closed meetings; and creating nature corridors and outdoor classrooms. Today's dialogue is part of that lineage. I want the record to reflect that Village staff, CARPC staff, Drift's Edge Conservancy, and community members have been coordinating in good faith. The question is continuity: do our current decisions keep faith with past lessons and public commitments?

Regulatory Executive Summary (NR 716 / NR 712; Burial Sites Law)

• NR 716 requires a complete Site Investigation to define the nature, degree, and extent of contamination; identify sources; and determine whether interim/remedial actions are needed. A Site Investigation Report (SIR) is due within 60 days of receiving field/lab results and must include an executive summary, methods, full results, maps/cross-sections, hydrogeology, and geospatial referencing. Documents must be prepared or supervised by a qualified professional and certified under NR 712.

• Step 0 — Environmental Health Baseline: Prior to new disturbance, publish the Phase I/II ESA findings and, where appropriate, independent testing for historic agrochemicals (e.g.,

atrazine/2,4-D residues, nitrate, PFAS, metals). Make locations of monitoring wells and the groundwater flow map available, with WTM '91 coordinates. This baseline reduces later disputes and speeds closure.

• Burial Sites and Cultural Due Care (Wis. Stats. §157.70; HS ch. 2): It is unlawful to disturb burial sites. Suspected finds trigger immediate stop-work, notification to the Wisconsin Historical Society's Burial Sites Program and law enforcement, consultation with Tribal Historic Preservation Offices, and a comment/consultation period, followed by culturally appropriate closure and reburial/curation, with costs borne by the responsible party.

WQML #2503 Crosswalk — Actions & Documentation

The following items from WQML #2503 should be explicitly adopted in the Badger Trails approvals and posted to the public record:

• Environmental Corridor delineation including 100-ft wetland buffer and 20-ft edge buffers; erosion/sediment controls prior to grading; easements and perpetual maintenance agreements for stormwater facilities.

• Stormwater plan meeting/exceeding NR 151, Dane County Ch. 14, and Village Ch. 450: peak rate control (1-, 2-, 10-, 100-, 200-yr NRCS MSE4), ≥80% TSS reduction, ≥90% stay-on volume (or equivalent recharge of 9–10 in/yr), thermal control for discharges to Ross Crossing Creek wetlands, and oil/grease treatment for the first 0.5 in runoff where applicable.

• Agreed enhancements: target 100% stay-on volume (as practicable with decentralized infiltration), match predevelopment runoff volumes for 1-, 2-, 10-, 100-, 200-yr storms, and implement thermal controls for ERW/ASNRI-connected wetlands.

• Village lift station capacity confirmation or impeller upgrade by phase; no 208 conformance letter until capacity is documented.

• Recommendations to implement: salt-wise certification for winter maintenance; perimeter wayfinding/signage; native/invasives management; DNR Endangered Resources Review; and a Phase I archaeological survey before any ground disturbance, with protection if resources are found.

Procedural Clarifications Requested for the Record

• Have complete NR 716/NR 712-certified Site Investigation materials (and Phase I/II ESA) for The Yards and for Badger Trails been filed and made public?

• Has WHS/DHPH and the appropriate Tribal Historic Preservation Office(s) been formally consulted regarding archaeological/cultural resources (including prior work by Joyce McKay)?

• What were the public costs associated with The Yards remediation (soil removal/disposal, engineering), and where are the contracts, manifests, and closure letters archived for citizen review?

Meta-Meta: Public Trust, Health, and Memory

Wisconsin's Public Trust tradition expects governments to protect shared waters and their connected lands. Our community's health, like our river, is a public trust. Veterans' advocacy taught us another parallel: the PACT Act recognizes that hidden exposures have consequences. Likewise, our planning must acknowledge known or suspected exposures in soil and water and communicate plainly—before people and pets live over them.

A Conservation-Forward Path (Constructive Alternative)

Belleville can be a state model for conservation-based planning: cluster lots away from sensitive corridors; retain continuous green buffers and tree lines; use permeable pavements and rain gardens; and link sidewalks to existing trails. This approach can maintain housing goals while reducing runoff, protecting habitat, and honoring prior public investments in Lake Belle View and the Sugar River corridor.

Closing Reflection

I'm not here to slow progress. I'm here to ask that progress be worthy of this place. Before another foundation is poured, confirm that the NR 716 record is complete and public; adopt the WQML #2503 crosswalk; and formalize the burial-sites protocol. That is how Belleville converts regulation into remembrance—and remembrance into design.

Appendix A — Burial Sites Protocol: Commitment Language

This protocol commits the Village of Belleville, CARPC, and development partners to comply with Wisconsin burial-sites protections and cultural consultation prior to, during, and after ground-disturbing activities within The Yards, the Badger Trails development, or associated parcels along the Sugar River corridor.

Legal Basis and Purpose

Wis. Stats. §157.70 and HS ch. 2 protect cataloged and uncataloged burial sites. Suspected discoveries trigger immediate stop-work, notification to WHS Burial Sites Program and law enforcement, and consultation with affiliated Tribal Historic Preservation Offices. Culturally appropriate closure (reburial/curation) follows, with costs borne by the responsible party.

Notification, Documentation, and Ceremony

• Post site rules and train contractors on stop-work/notify protocols.
• During the 30-day consultation window, preserve context and document GPS locations, photos, and field notes for curation with WHS.
• Provide time and privacy for Indigenous-led ceremony; coordinate reinterment/curation logistics and costs.

Transparency and Archiving

Publish a culturally sensitive summary of outcomes to the Village website and CARPC record, and archive reports in the Belleville Public Library.

Signed and affirmed this ___ day of _____, 2025.

_____
Village of Belleville / Authorized Representative