

**AMENDMENT TO THE**

**REGIONAL WATER QUALITY  
MANAGEMENT PLAN**

**VILLAGE OF SUSSEX  
AND ENVIRONS**

**AS ADOPTED BY THE**

**SOUTHEASTERN WISCONSIN REGIONAL PLANNING COMMISSION**

**MARCH 2006**

**SOUTHEASTERN WISCONSIN  
REGIONAL PLANNING COMMISSION**

**KENOSHA COUNTY**

Leon T. Dreger  
Adelene Greene  
Leonard R. Johnson

**RACINE COUNTY**

Richard A. Hansen,  
Treasurer  
Michael J. Miklasevich  
James E. Moyer

**MILWAUKEE COUNTY**

William R. Drew,  
Vice Chairman  
Lee Holloway  
Linda J. Seemeyer

**WALWORTH COUNTY**

Anthony F. Balestrieri  
Gregory L. Holden  
Allen L. Morrison

**OZAUKEE COUNTY**

Robert A. Brooks  
Thomas H. Buestrin,  
Chairman  
Gus W. Wirth, Jr.  
Secretary

**WASHINGTON COUNTY**

Kenneth F. Miller  
Daniel S. Schmidt  
David L. Stroik

**WAUKESHA COUNTY**

Kenneth C. Herro  
Anselmo Villarreal  
Paul G. Vrakas

**SOUTHEASTERN WISCONSIN REGIONAL  
PLANNING COMMISSION STAFF**

Philip C. Evenson, AICP . . . . . Executive Director  
Kenneth R. Yunker, PE . . . . . Deputy Director  
Nancy M. Anderson, AICP . . . . . Chief Community Assistance Planner  
Robert E. Beglinger . . . . . Chief Transportation Engineer  
Michael G. Hahn, PE, PH . . . . . Chief Environmental Engineer  
Leland H. Kreblin, RLS . . . . . Chief Planning Illustrator  
Elizabeth A. Larsen . . . . . Business Manager  
John G. McDougall . . . . . Geographic Information Systems Manager  
John R. Meland . . . . . Chief Economic Development Planner  
Dr. Donald M. Reed . . . . . Chief Biologist  
Kenneth J. Schlager, PE, . . . . . Chief Telecommunications Engineer  
William J. Stauber, AICP . . . . . Chief Land Use Planner

# SOUTHEASTERN WISCONSIN REGIONAL PLANNING COMMISSION

W239 N1812 ROCKWOOD DRIVE • PO BOX 1607 • WAUKESHA, WI 53187-1607 •

TELEPHONE (262) 547-6721  
FAX (262) 547-1103

*Serving the Counties of:*

KENOSHA  
MILWAUKEE  
OZAUKEE  
RACINE  
WALWORTH  
WASHINGTON  
WAUKESHA



**SUBJECT:** Certification of Amendment to the Adopted Regional Water Quality Management Plan (Sussex Sewer Service Area)

**TO:** The Legislative Bodies of Concerned Local Units of Government within the Southeastern Wisconsin Region, namely: the County of Waukesha, the Village of Sussex, and the Town of Lisbon

This is to certify that at the meeting of the Southeastern Wisconsin Regional Planning Commission, held at the Mequon City Hall, Mequon, Wisconsin, on the 1st day of March 2006, the Commission did by unanimous vote of all Commissioners present, being 12 ayes and 0 nays, and by appropriate Resolution, a copy of which is made a part hereof and incorporated by reference to the same force and effect as if it had been specifically set forth herein in detail, adopt an amendment to the regional water quality management plan, which plan was originally adopted by the Commission on the 12th day of July 1979, as part of the master plan for the physical development of the Region. Said amendment to the regional water quality management plan pertains to the revised Sussex sanitary sewer service area and consists of the documents attached hereto and made a part hereof. Such action taken by the Commission is recorded on, and is a part of, said plan, and the plan as amended is hereby transmitted to the constituent local units of government for consideration, adoption, and implementation.

IN TESTIMONY WHEREOF, I have hereunto set my hand and seal and cause the Seal of the Southeastern Wisconsin Regional Planning Commission to be hereto affixed. Dated at the City of Pewaukee, Wisconsin, this 2nd day of March 2006.

Thomas H. Buestrin, Chairman  
Southeastern Wisconsin  
Regional Planning Commission

ATTEST:

Philip C. Evenson, Deputy Secretary

**RESOLUTION NO. 2006-05**

**RESOLUTION OF THE SOUTHEASTERN WISCONSIN REGIONAL PLANNING  
COMMISSION AMENDING THE ADOPTED REGIONAL WATER QUALITY  
MANAGEMENT PLAN, THAT PLAN BEING A PART OF THE MASTER PLAN  
FOR THE PHYSICAL DEVELOPMENT OF THE REGION CONSISTING OF THE  
COUNTIES OF KENOSHA, MILWAUKEE, OZAUKEE, RACINE, WALWORTH,  
WASHINGTON, AND WAUKESHA IN THE STATE OF WISCONSIN  
(SUSSEX SANITARY SEWER SERVICE AREA)**

WHEREAS, pursuant to Section 66.0309(10) of the *Wisconsin Statutes*, the Southeastern Wisconsin Regional Planning Commission, at a meeting held on the 12th day of July 1979, duly adopted a regional water quality management plan as documented in the three-volume SEWRPC Planning Report No. 30, *A Regional Water Quality Management Plan for Southeastern Wisconsin: 2000*; and

WHEREAS, at a meeting held on the 7th day of September 1994, the Commission duly adopted an amendment to the regional water quality management plan refining and detailing the Sussex sanitary sewer service area as documented in SEWRPC Community Assistance Planning Report No. 84 (2nd Edition), *Sanitary Sewer Service Area for the Village of Sussex, Waukesha County, Wisconsin*, dated September 1994, as amended; and

WHEREAS, at an intergovernmental meeting on January 10, 2006, representatives of the Village of Sussex and the Town of Lisbon requested that the Commission amend the Sussex sanitary sewer service area to include certain lands located outside of the currently adopted sewer service area; and

WHEREAS, the proposed amendment to the regional water quality management plan is documented in a Commission staff memorandum entitled, "Response to Requests by the Village of Sussex and the Town of Lisbon to Amend the Sussex Sanitary Sewer Service Area," attached hereto and made a part hereof; and

WHEREAS, the requested change to the regional water quality management plan, as documented in the aforementioned staff memorandum, was the subject of a public hearing held jointly by the Village of Sussex and the Regional Planning Commission on February 14, 2006; and

WHEREAS, Section 66.0309(9) of the *Wisconsin Statutes* authorizes and empowers the Regional Planning Commission, as the work of making the whole master plan progresses, to amend, extend, or add to the master plan or carry any part or subject thereof into greater detail;

NOW, THEREFORE, BE IT HEREBY RESOLVED:

FIRST: That the regional water quality management plan for the Southeastern Wisconsin Region, being a part of the master plan for the physical development of the Region and comprised of SEWRPC Planning Report No. 30, Volumes One, Two, and Three, which was adopted by the Commission as a part of the master plan on the 12th day of July 1979, and which was amended on the 7th day of September 1994 to include the refined Sussex sewer service area, as set forth in SEWRPC Community Assistance Planning Report No. 84 (2nd Edition), be and the same hereby is amended in the manner identified on Map 1 of the aforementioned SEWRPC staff memorandum.

SECOND: That the Executive Director is authorized to submit findings to the Wisconsin Department of Natural Resources and the Wisconsin Department of Commerce that public and private sanitary sewer extensions necessary to serve the anticipated development on the lands concerned are in conformance with, and would serve to implement, the adopted regional water quality management plan as herein amended.

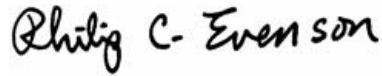
THIRD: That a true, correct, and exact copy of this resolution, together with the aforementioned SEWRPC staff memorandum, shall be forthwith distributed to each of the local legislative bodies of the local governmental units within the Region entitled thereto and to such other bodies, agencies, or individuals as the law may require or as the Commission, its Executive Committee, or its Executive Director, at their discretion, shall determine and direct.

The foregoing resolution, upon motion duly made and seconded, was regularly adopted at the meeting of the Southeastern Wisconsin Regional Planning Commission held on the 1st day of March 2006, the vote being: Ayes 12; Nays 0.

A handwritten signature in black ink, appearing to read 'Thomas H. Buestrin', with a long horizontal flourish extending to the right.

Thomas H. Buestrin, Chairman

ATTEST:

A handwritten signature in black ink, appearing to read 'Philip C. Evenson', written in a cursive style.

Philip C. Evenson, Deputy Secretary

## SEWRPC STAFF MEMORANDUM

### RESPONSE TO REQUESTS BY THE VILLAGE OF SUSSEX AND THE TOWN OF LISBON TO AMEND THE SUSSEX SANITARY SEWER SERVICE AREA

#### INTRODUCTION AND BACKGROUND

At an intergovernmental meeting on January 10, 2006, representatives of the Village of Sussex and the Town of Lisbon requested that the Southeastern Wisconsin Regional Planning Commission amend the sanitary sewer service area tributary to the Village of Sussex sewage treatment facility. That area is currently documented in SEWRPC Community Assistance Planning Report No. 84 (2nd Edition), *Sanitary Sewer Service Area for the Village of Sussex, Waukesha County, Wisconsin*, dated September 1994, as amended. The basic purpose of this amendment would be to include within the planned Sussex sewer service area certain lands located immediately adjacent to, but outside, the currently adopted sewer service area.

#### AREA DESCRIPTION

Two areas, identified as Area A and Area B on Map 1, are proposed to be added to the area tributary to the Sussex sewage treatment plant. These areas are described below.

##### Area A

Area A is proposed to be added to the sewer service area by the Village of Sussex. Area A is located north of Good Hope Road in U.S. Public Land Survey Section 15, Township 8 North, Range 19 East, in the Village of Sussex. It encompasses 40 acres. There are three existing housing units in the area; no environmentally significant areas have been identified. The area is expected to accommodate future residential development, consisting of a 39-lot single-family subdivision, with an estimated population of 100 persons.

##### Area B

Area B is proposed to be added to the sewer service area by the Town of Lisbon. Area B is located south of Howard Lane and east of STH 164, in U.S. Public Land Survey Section 16, Township 8 North, Range 19 East, in the Town of Lisbon. This area encompasses 18 acres, including about 2 acres of small wetlands. The developable portion of Area B is anticipated to accommodate future commercial development.

The proposed additions to the sewer service area, and any environmentally significant lands within, are shown in detail on the aerial photographs reproduced as Maps 2 and 3.

It should be noted that the currently proposed amendment is an interim expansion of the sewer service area. It is expected that the Village of Sussex and Town of Lisbon will seek further expansion of the sewer service area tributary to the Sussex sewage treatment plant, in accordance with their mutual boundary agreement, later this year.

#### RELATIONSHIP TO THE EXISTING SANITARY SEWER SERVICE AREA

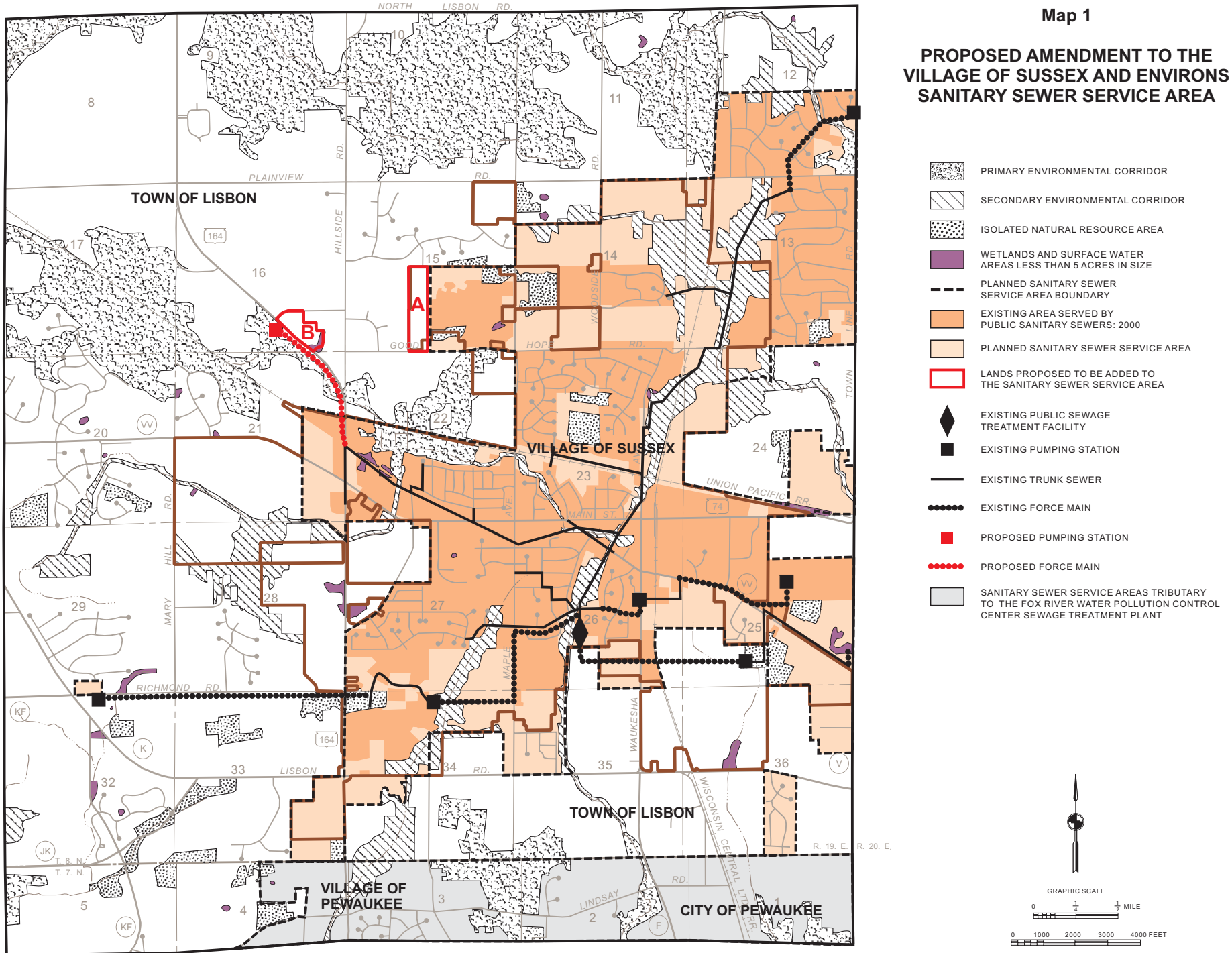
The proposed addition of 58 acres (Area A and Area B combined) to the Sussex sanitary sewer service area represents a minor increase in the planned sewer service area of less than 1 percent, and the associated resident population of 100 persons would represent a minor increase in the population of the sewer service area. Thus, the areal extent and planned population of the Sussex sanitary sewer service area would not change significantly.

#### WATER QUALITY IMPACTS

Under the adopted regional water quality management plan and the sanitary sewer service area plan herein set forth, it is envisioned that all urban lands within the planned urban service area would receive sanitary sewer service. Assuming that all applicable Federal, State, and local permits are obtained and that proper site development and construction practices are

Map 1

# PROPOSED AMENDMENT TO THE VILLAGE OF SUSSEX AND ENVIRONS SANITARY SEWER SERVICE AREA



employed, there should be no significant adverse water quality impacts attributable to the development of the planned sanitary sewer service area.

## SEWERAGE SYSTEM CAPACITY IMPACT ANALYSIS

The existing Village of Sussex sewage treatment plant has a hydraulic design capacity of about 3.2 million gallons per day (mgd) on an average annual flow basis. This treatment plant capacity is shared by the Villages of Sussex, Lannon, and Menomonee Falls; the Town of Lisbon Sanitary District No. 1; and the Town of Lisbon. The average annual flow rate to the treatment plant in 2004 was about 2.0 mgd. The anticipated sewage flow to be generated in the areas proposed to be added to the sewer service area may be expected to be between 0.02 and 0.03 mgd on an average annual basis upon full development. Thus, the treatment plant has capacity to serve the proposed additions to the sewer service area.

The Village of Sussex recently completed a facility plan for expansion of its sewage treatment plant to increase capacity from 3.2 mgd to as much as 5.1 mgd on an average annual basis. The Village anticipates completing design work and initiating construction for the plant expansion during 2006, with the project envisioned to be completed in 2007.

## PUBLIC REACTION TO THE PLAN AMENDMENT

A public hearing was held on February 14, 2006, at the Sussex Village Hall to receive public comment on, and reaction to, the proposed sewer service area plan amendment. The hearing was sponsored by the Village of Sussex and the Regional Planning Commission. A summary of the plan amendment—including a description of the lands proposed to be added to the sewer service area and the environmentally significant lands within—was presented prior to receiving public comment.

Prior to the hearing, four individuals, including two residents of the Village of Sussex and two residents of the Town of Lisbon, co-signed a letter to the Village of Sussex and SEWRPC, objecting to the proposed sewer service area amendment (see Appendix A). Among other things, the letter expressed concern about the pace of growth in the Sussex-Lisbon area, characterizing the growth as “out of control,” and argued that the subject areas, particularly Area B, are not developable due to high groundwater levels and soil conditions. The letter also raised stormwater management concerns. One of the co-signers of the letter spoke against the proposed amendment at the hearing, reiterating several of the comments expressed in the letter. One other individual, a resident of the Town of Lisbon, spoke against the addition of Area B to the sewer service area, indicating that he was opposed to commercial development in that area, and more generally, that he was opposed to the Town’s involvement in providing additional sewer service. At the hearing, the engineering consultant for the Town of Lisbon submitted a written point-by-point response to the concerns raised in the letter from the four Village of Sussex and Town of Lisbon residents (see Appendix B).

At its regular meeting following the hearing, the Sussex Village Board approved the sewer service area plan amendment as presented at the hearing.

## CONCLUDING RECOMMENDATION

Based upon a review of the record of the public hearing, no revision to the proposed sewer service area amendment is deemed warranted. There are no environmental corridors or isolated natural areas on either site, and only a small portion of Area B has been identified as a wetland. With respect to Area B, the Town Engineer’s report indicates that, while there may be areas of high water table, commercial development served by sanitary sewer would be acceptable. The land uses envisioned for Areas A and B are consistent with the land use plans adopted by the Village of Sussex and the Town of Lisbon. The extension of sewer service to these sites is consistent with Village-Town boundary agreements. Accordingly, it is recommended that the Southeastern Wisconsin Regional Planning Commission formally amend the Village of Sussex and environs sewer service area in the manner identified on Map 1.




## Map 2

### ENVIRONMENTALLY SIGNIFICANT LANDS AND PLANNED SANITARY SEWER SERVICE AREA FOR THE VILLAGE OF SUSSEX AND ENVIRONS

Southeast Quarter of U. S. Public Land Survey Section 16  
Township 8 North, Range 19 East

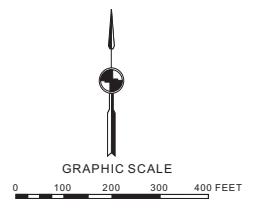


Photography Date: March 2000

-  PRIMARY ENVIRONMENTAL CORRIDOR
-  WETLANDS AND SURFACE WATER AREAS LESS THAN FIVE ACRES IN SIZE
-  GROSS SANITARY SEWER SERVICE AREA BOUNDARY

-  PLANNED SANITARY SEWER SERVICE AREA

NOTE: This map replaces Map 9-3, page 27, of SEWRPC Community Assistance Planning Report No. 84 (2nd Edition), *Sanitary Sewer Service Area for the Village of Sussex, Waukesha County, Wisconsin*, September 1994.



Source: SEWRPC.

# Map 3

## ENVIRONMENTALLY SIGNIFICANT LANDS AND PLANNED SANITARY SEWER SERVICE AREA FOR THE VILLAGE OF SUSSEX AND ENVIRONS

Southwest Quarter of U. S. Public Land Survey Section 15  
Township 8 North, Range 19 East

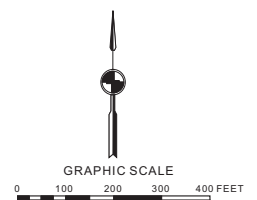


Photography Date: March 2000

- GROSS SANITARY SEWER SERVICE AREA BOUNDARY
- PLANNED SANITARY SEWER SERVICE AREA

NOTE: This map replaces a portion of Map 9-3, page 27, of SEWRPC Community Assistance Planning Report No. 84 (2nd Edition), *Sanitary Sewer Service Area for the Village of Sussex, Waukesha County, Wisconsin*, September 1994.

Source: SEWRPC.



# Appendix A

February 1, 2006

Mr. Timothy McCauley  
Principal Planner  
Southeastern Wisconsin Regional  
Planning Commission  
Post Office Box 1607  
Waukesha, WI 53187-1607

Village of Sussex Board Members  
N64 W23760 Main Street  
Sussex, WI 53089

Re: Comments on Amendment to Sussex Sanitary Sewer Area

Dear Mr. McCauley and Board Members:

In response to the Notice of Public Hearing published in the January 24, 2006 edition of the Sussex Sun, we provide the following comments on the proposed amendment to the Sussex Sanitary Sewer Area.

In recent years, both the Village of Sussex and the Town of Lisbon have experienced a substantial increase in residential and commercial development. While growth in communities is inevitable, it is imperative that growth be controlled and managed at a pace that does not have a detrimental impact on the quality of life of those living in the community and the environment.

Unfortunately, that control and management of growth is not occurring in either the Village of Sussex or the Town of Lisbon. Developers are obtaining approval from the Village and Town Boards to subdivide any open lands they can persuade property owners to sell or sign contracts for rights to purchase. Mid- to high-density subdivisions are sprouting up all over Sussex and Lisbon. New retail and commercial developments are being built even though existing retail/commercial space has yet to be occupied. Sussex had to request approval from the Town of Lisbon to build new water supply wells in the Town of Lisbon to supplement its shortage of drinkable water for its current residents and business owners. The Hamilton School District recently created yet another Facilities Advisory Committee to provide suggestions on how to handle the growth issues at the elementary, middle and high schools. The Town of Lisbon is seeking to build three new fire stations to better accommodate the growth in the Town. So, to put it bluntly, the current rate of residential and business growth in Sussex and Lisbon is out of control.

The lands being proposed to be added to the Sussex Sanitary Sewer Area are lands that currently cannot be developed due to high groundwater levels and soil conditions. In other words, these lands do not pass perc tests to be developed with septic systems. In particular, with regard to Area B referenced in the SEWRPC report, that land is bordered by wetlands on

Village of Sussex  
Southeastern Wisconsin Regional Planning Commission  
February 1, 2006  
Page 2

the south and the west, and the groundwater under that land is very high. (A recent test on property just west of Area B had water percolating at less than two feet at its highest elevation.) In addition, that area has already been environmentally damaged due to the new residential developments along Hillside Road. The natural flow of water moves from east of Hillside Road to the west and under Highway 164 into the wetlands. The Town has had to dredge out ditches along Hillside Road and Howard Lane over the last couple of years to accommodate the increased water flow and flooding in the spring and summer months. In addition, the expansion of Highway 164 will destroy even more of the wetlands and add to the water flow concerns. Additional development in these areas (even with the extension of sewer service) with more roads, grade alterations, homes and commercial buildings will not only devastate what remains of the natural water flow and destroy the wetlands and uplands areas but will add to the already strained Sussex water treatment plant.

Further, Waukesha County is under pressure to find new sources of water because of growing demand and dwindling groundwater supplies. Recent studies have shown that water supplies are replenished by water recycling through homeowners' septic systems and back into the groundwater. Adding more lands to a sanitary sewer system rather than using more environmentally sound septic systems will only add to the shortage of water in the County.

Therefore, we urge the Southeastern Wisconsin Regional Planning Commission and the Village of Sussex to be responsible and not amend the existing sanitary sewer area to include the proposed lands in the Town of Lisbon.

Sincerely,

Robb and Sherry Howard  
Town of Lisbon Residents

John and Carol David  
Village of Sussex Residents

## Appendix B

### JAHNKE & JAHNKE ASSOCIATES INC.

CONSULTANTS IN  
ENGINEERING, PLANNING, SUBDIVISIONS AND SURVEYING

711 W. Moreland Blvd.  
Waukesha, WI 53188-2479

Telephone: 262-542-5797  
Fax: 262-542-7698  
E-Mail: bdupont@jahnkeandjahnke.com

February 14, 2006

Mr. Timothy McCauley  
Principal Planner  
SEWRPC  
PO Box 1607  
Waukesha, WI 53187-1607

Village of Sussex Board Members  
N64 W23760 Main St  
Sussex, WI 53089

RE: Response to February 1, 2006 Letter from Robb & Sherry Howard  
and John and Carol David

Dear Mr. McCauley and Board Members:

The Town of Lisbon has requested the proposed Sewer Service Area (SSA) amendment after extensive long range planning efforts. As Town of Lisbon Engineer, Jahnke & Jahnke Associates Inc. has participated in these planning efforts. Therefore we deem it appropriate to respond to the attached letter from Robb & Sherry Howard and John & Carol David (Howard letter). The following is a point by point response to the Howard letter.

We agree that the Town of Lisbon is experiencing growth at higher rates than residents are used to, but the growth is not out of place with other communities on the fringe of the Milwaukee Metropolitan area. The majority of new subdivisions have a minimum lot size of one acre. By SEWRPC Land Use maps this would be a low density and possibly a suburban density, certainly not a "Mid to High-Density" development alluded to in the Howard letter.

While there is always concern regarding vacant retail/commercial space, developers of such space usually do not proceed unless they have an "anchor tenant" to justify the development. Smaller retail/commercial space often takes longer to lease because the developer may not have been able to lease the space prior to moving forward with the development. Our observation is this is a short term problem and that developers will not continue to build space if market demands do not support occupancy.

Water supply issues are always present in growing communities and are of particular concern when deep wells are involved due to potential radium content. Having fewer high capacity wells serving a community, as opposed to individual wells serving each developed property, reduces the number of conduits to the aquifer by which contamination may be conveyed. Communities in the area are investigating ways to cooperate to provide municipal water systems which provide reliability and the added benefit of fire protection. A new well should not be looked over as a detriment, but as an enhancement to a uniform water supply system and fire protection system.

Page 3  
Timothy McCauley

systems help recharge the ground water, deficient systems can be a cause of contamination of the ground. Utilizing a sewer system and treatment plant to dispose of sewage provides for regular monitoring of this system by Wisconsin Dept. of Natural Resources.

In conclusion, the Town is sensitive to unrestricted growth and we believe the Town is proceeding on a reasonable growth scenario given its location to the Milwaukee Metropolitan area. Therefore, we believe the Town is being "Responsible" in requesting that this sewer service amendment be approved.

If you have any questions, please contact us at 262-542-5797.

Sincerely,

JAHNKE & JAHNKE ASSOCIATES INC.

Brian DuPont, P.E.

John R. Stigler, President

BD/JRS/amf  
cc: Jeff Musche, Town Clerk/Admin.

Page 2  
Timothy McCauley

Residential growth often spurs the need for growth of the public school system. The school district can not control the amount of school age children which they are responsible to educate, but they can work with local municipalities to track the residential growth and formulate a reasonable school growth plan. Since the Howard letter alludes to the Hamilton School District creating another Facilities Advisory Committee, the District appears to be addressing this issue.

Residential and Commercial growth will also require that protective services such as fire protection be increased. The Town currently has one fire station located at Hillside and Good Hope Roads. The Town has performed a Master Plan for fire protection based on ultimate growth and has determined that a total of 3 fire stations would serve an ultimate growth scenario. This planning was done to provide direction in choosing a site for a second fire station which is scheduled for construction this year. Construction of additional stations is dependent on growth. This long term planning should not be misconstrued such that growth has caused the Town to build more than one additional fire stations at this time. In addition the planned station's chosen location was determined based on desired response time to present residents.

The Town lands proposed to be included in the sewer service area may have high ground water table but would be acceptable for commercial development with sanitary sewer. The portion of the area which is wetlands is not proposed to be developed. Any development will be reviewed such that minimal impact to the wetlands is incorporated into the plans. The Towns Zoning and Municipal Codes protect wetlands along with other regulatory agencies.

The Town is not aware of any "Environmental Damage" to the area due to developments on Hillside Road. Existing roadside ditches on Howard Avenue are very flat and therefore are subject to filling with silt and needing periodic dredging. However, the majority of the Hillside frontage which drains to Howard Avenue has been developed for many years. More recent developments along Hillside have drained to the West approximately 500' north of Howard and do not have any effect on these roadside ditches. In fact Hillside Road used to experience flood waters over topping the road on a fairly regular basis but since new developments require detention basins for storm water management the frequency of Hillside flooding has been reduced.

The Sussex treatment plant is being expanded to accommodate growth. The Town of Lisbon along with Villages of Lannon and Menomonee Falls have been working together to assure that expansion of the plant will serve all of our needs in the near future. The density of growth that is projected in the Town is reasonable and is less dense than the other three Villages. Therefore we do not believe the planned growth is out of place as eluded to in the Howard letter.

The issue of ground water recharge is probably the most difficult to address in new development. Development regulations require infiltration where practicable, but most development will have a net reduction in infiltration. The Town is committed to minimize the loss of infiltration of surface runoff but believes the areas to be served would have a minimum effect to the overall ground water recharge system. It should also be noted that while properly working septic