



136 North Monroe Street  
Waterloo, Wisconsin 53594-1198

### **NOTICE OF A CITY OF WATERLOO PLAN COMMISSION MEETING**

Pursuant to Section 19.84 Wisconsin Statutes, notice is hereby given to the public and the news media, the following meeting will be held to consider the following:

**MEETING: SPECIAL PLAN COMMISSION**  
**DATE: THURSDAY, November 3, 2022** **TIME: 5:45 p.m.**  
**LOCATION: 136 N. MONROE STREET, MUNICIPAL BUILDING COUNCIL CHAMBERS**

Join Zoom Meeting <https://us02web.zoom.us/j/86800985736?pwd=Y2hBa2x4OERzQi9OWUE4eGEyWUhvUT09>  
Meeting ID: 868 0098 5736 Passcode: 943338  
Dial by phone +1 312 626 6799 US (Chicago)

### **PLAN COMMISSION REGULARLY SCHEDULED MEETING**

- 1) CALL TO ORDER AND ROLL CALL
- 2) APPROVAL OF MEETING AND PUBLIC HEARING MINUTES: October 25, 2022
- 3) CITIZEN INPUT
- 4) NEW BUSINESS
  - a. Discussion on TID 5 Overlay District Creation
- 5) FUTURE AGENDA ITEMS & ANNOUNCEMENTS
- 6) ADJOURNMENT

Jeanne Ritter, Clerk/Deputy Treasurer

Members: Leisses, Quimby, Petts, Crosby, Reynolds, Lannoy & Sorenson Posted, Distributed & Emailed: 10/28/2022

PLEASE NOTE: It is possible that members of and possibly a quorum of members of other governmental bodies of the municipality may be in attendance at the above meeting(s) to gather information. No action will be taken by any governmental body other than that specifically noticed. Also, upon reasonable notice, efforts will be made to accommodate the needs of disabled individuals through appropriate aids and services. For additional information or to request such services please contact the clerk's office at the above location.



[info@non-mc.com](mailto:info@non-mc.com)

329 W 3<sup>rd</sup> St. Fox Lake, WI 53933

(920) 203-3859

October 18, 2022

Waterloo City Hall  
Attn: CDA  
136 North Monroe Street  
Waterloo, WI 53594

Re: TID 5 Creation

Dear CDA:

Non-metro Connections is interested in submitting a proposal for TID 5 creation for the City of Waterloo, and as such, is submitting the following for your consideration. Non-Metro Connections plans to utilize Short Elliot Hendrickson, Inc. as a subconsultant for the process of TID #5 creation.

1. **Scope of Work**

Creation of TID #5 Project Plan and Map.

In consultation with the Client, Consultant will prepare a project plan describing the boundary of Tax Increment Financing District #5 ("TID #5"), anticipated projects and the identification of how those projects will be implemented and financed. A TID boundary map and boundary description will include parcel identification numbers as reflected on current assessment rolls and/or tax list of the assessor for Jefferson County, Wisconsin. The Project Plan development shall include but not be limited to the following tasks:

- a. Preparation of a Project Plan process (task and timetable) based upon confirmed meeting schedules as it related to Wisc. Stats. required approvals.
- b. Preparation of the Project Plan to stimulate further economic development through public investment in eligible capital costs and other expenditures to be identified in the Project Plan.
- c. Develop and prepare the required elements of the Project Plan, more specifically inclusion of a financial analysis of eligible expenditures as well as new eligible expenditures based upon redevelopment and economic opportunities presented to the City Council for an identified expenditure period of the Project Plan.
- d. Preparation eligible expenditure costs schedule TID cash flow (pro forma) to identify ability to pay for costs anticipated from a Tax Increment District fund of the City.

- e. Communications with City Council and the Plan Commission as necessary to complete the Project Plan for submission and presentation to the Plan Commission for consideration and approving resolution to the Common Council.

Project Plan Approval Process. Assist the Client with the preparation of the documentation and resolutions necessary for Project Plan approvals, including but not limited to:

- f. A written request to other taxing units (the “Overlapping Taxing Units”), requesting that a representative serve on the Joint Review Board (the “JRB”). The Client will be responsible for sending these written requests. The JRB shall be composed of a representative from: (i) school district, (ii) technical college district the (iii) City, and (iv) a member of the public.
- g. Notice to property owners located within the TID. If the TID is a blighted or rehabilitation/ conservation type classification, the affected properties and owners will be identified. The City will be responsible for filing and mailing via first-class mail notification letters at least 15-days prior to the scheduled public hearing.
- h. Public notice for the Plan Commission Public Hearing. The Client will be responsible for publishing and posting the official public notice. The first notice to be published 14 days prior to the public hearing, the second notice 7 days prior, in accordance with Wisc. Stats.
- i. Participation and presentation of the Project Plan and TID to the Plan Commission prior to consideration of a resolution for approval to the City Council.
- j. Resolution of the City Plan Commission approving the Project Plan and the TID.
- k. Participation and presentation of the Project Plan and TID to the City Council prior to consideration of a resolution adopting the Project Plan and the TID.
- l. Resolution of the City Council approving the Project Plan and the TID. If the Resolution is approved, assist the Client with the filing of the approving documentation to the JRB.
- m. Assistance to the Client to convene a JRB meeting. Consultant will prepare a public meeting notice for publication by the Client. The Client will be responsible for distribution, publishing and posting of the public hearing notice.
- n. Resolution of the JRB approving the documents filed by the City as it relates to the Project Plan and the creation of a TID.
- o. Wisc. Stats. forms as appropriate for filing: PE-605, PE-605T, PE-605ER or PE-605A, PE-606, PE- 608, PE-601A, PE-619, PE-608M, PE-608MP and PE-615A, including communication with the local and manufacturing assessors to ensure accurate current assessment values.

Wisconsin Department of Revenue. Assist the Client with the preparation of documentation for submission and filing with the Wisconsin Department of Revenue (the “DOR”) as it relates to the creation of a TID.

- p. Consultant will prepare the DOR application, as required by the State’s TID Application Checklist, and submit in partnership with the City Clerk, to the DOR for base value

certification. The Client will provide the appropriate application fee to the DOR.

- q. Consultant will assist the Client in responding to questions or directives from the DOR based upon its review and certification of the base process.
- r. Following the DOR's certification letter provided to the City Clerk, the Consultant will provide direction to the local or county assessor to identify parcels within the TID on the most current tax list (assessment roll) and to the City Clerk for the identification on the tax list.

**2. Schedule**

Consultant will start services promptly (10/21). Consultant estimates services will take approximately 6 month to complete.

**3. Payment**

		Cost of Services
SEH		\$22,500
NMC		\$500
Not to Exceed		\$23,000

Payment will be requested via monthly invoice as services are performed.

Thank you for reviewing this proposal and your consideration.

Sincerely,

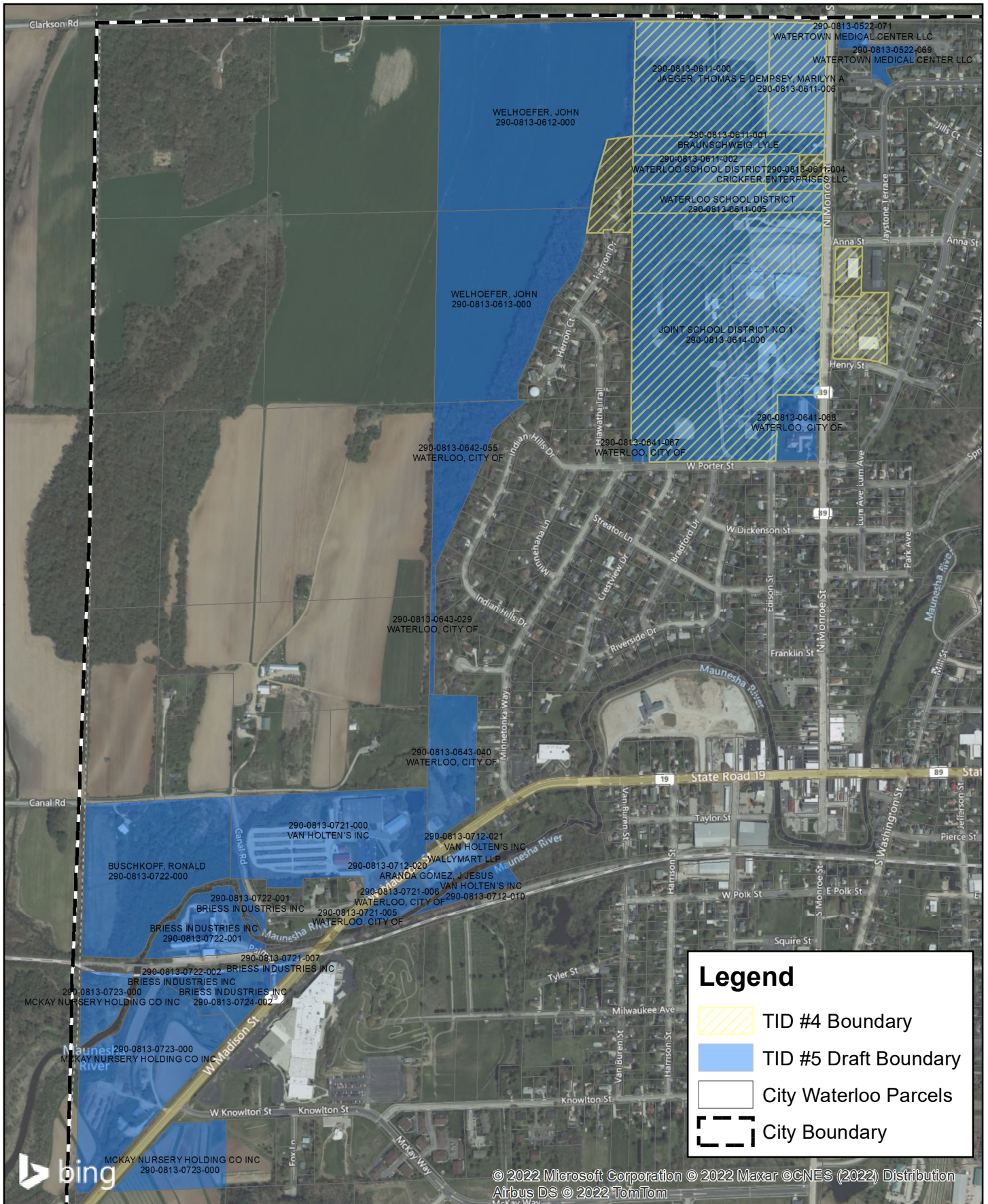


Everett Butzine

## Waterloo TID #5 Creation Timeline

PRELIMINARY DRAFT 9/27/2022

MEETINGS	TIMELINE	PROJECT MILESTONES & DELIVERABLES
Community Development Authority (CDA)	18-Oct	2022
Finance Committee & City Council	20-Oct	
Kick-Off Meeting with NMC	week of 24-Oct	
-	week of 24-Oct	
Plan Commission (PC)	25-Oct <i>(evaluate this date; might be too soon)</i>	
-		
-		
-		
Initial Joint Review Board (JRB)		
-		
Plan Commission (PC)		
-		
-		
City Council		
-		
Joint Review Board (JRB)		
Date for TID #5 Base Value Determination	1-Jan	2023
WI Department of Revenue Deadline	30-Sep	



Path: C:\P\projects\UZ\Waterloo\mxd\WATEL\_TID5\_Map.mxd



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	<p>501 MAPLE AVENUE DELAFIELD, WI 53018-9351 PHONE: (262) 646-6855 FAX: (888) 908-8166 TF: (800) 325-2055 www.sehinc.com</p>	<p>Project: WATEL 168479 Print Date: 10/27/2022  Map by: bgrace Projection: Source:</p>	<p><b>Draft TID #5 Boundary</b> FOR DISCUSSION ONLY Waterloo, WI</p>	<p>Figure 1</p>
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This map is neither a legally recorded map nor a survey map and is not intended to be used as one. This map is a compilation of records, information, and data gathered from various sources listed on this map and is to be used for reference purposes only. SEH does not warrant that the Geographic Information System (GIS) Data used to prepare this map are error free, and SEH does not represent that the GIS Data can be used for navigational, tracking, or any other purpose requiring exacting measurement of distance or direction or precision in the depiction of geographic features. The user of this map acknowledges that SEH shall not be liable for any damages which arise out of the user's access or use of data provided.

Education Session:

# Tax Increment Financing to Support Multi-family Development in Waterloo

# 2021 Jefferson County Housing Study

## Current Construction Rates Compared to Household Projections

Returning to the post 2010 construction rates, the current pace of new housing unit construction will be unable to meet the projected increase in new households. If we assume that new housing unit construction rates will remain relatively constant over the next ten years, the current housing shortage in Jefferson County will be compounded. Looking at the DOA household projection, the current rate of construction will be 2,422 housing units short of meeting future demand.

Table 33: Jefferson County: Housing Construction and Projected Households		
Total Housing Units Built Since 2010*	DOA Projected Household Growth 2020-2030	Projected Housing Shortage if Construction Rates Remain Unchanged
1,270	3,692	<b>(2,422)</b>

\*The ACS 1-year (2019) estimate is used here even though it has a higher margin of error since it more closely resembles building permit rates.

\*\*Source: ACS 1-year (2019) estimate, DOA



## Jefferson County Single Family Median Sales Price

Year	Median Home Price	Increase from Previous Year	Total % Appreciation Since 2016
2016	\$175,000		
2017	\$184,950	5.7%	5.7%
2018	\$215,000	16.2%	22.9%
2019	\$230,900	7.4%	31.9%
2020	\$249,950	8.3%	42.8%
2021	\$278,000	11.2%	58.9%

Source: MetroMLS; Summary Statistics for Entire MLS

Metric	September			Year to Date		
	2021	2022	+/-	2021	2022	+/-
New Listings	98	65	- 33.7%	770	668	- 13.3%
Closed Sales	83	77	- 7.2%	646	566	- 12.4%
Median Sales Price*	\$261,000	<b>\$292,400</b>	+ 12.0%	\$273,750	<b>\$309,500</b>	+ 13.1%
Percent of Original List Price Received*	99.9%	<b>98.9%</b>	- 1.0%	101.3%	<b>101.5%</b>	+ 0.2%
Days on Market Until Sale	22	<b>32</b>	+ 45.5%	30	<b>35</b>	+ 16.7%
Inventory - Single Family Residence	160	<b>119</b>	- 25.6%	--	--	--
Inventory - Townhouse/Condo	27	<b>19</b>	- 29.6%	--	--	--

\*Does not account for seller concessions. | Activity for one month can sometimes look extreme due to small sample size.

Source: MetroMLS Monthly Local Market Report; September 2022



Families making \$93,000/year –  
can spend up to \$2,325 before  
becoming house burdened

Scenario: Buying a \$309,500 house

20% down: \$61,900

Mortgage: \$247,600

*7.5% 30-yr fixed mortgage:*

\$1,731 principal and interest

\$513.77 taxes

\$75 insurance

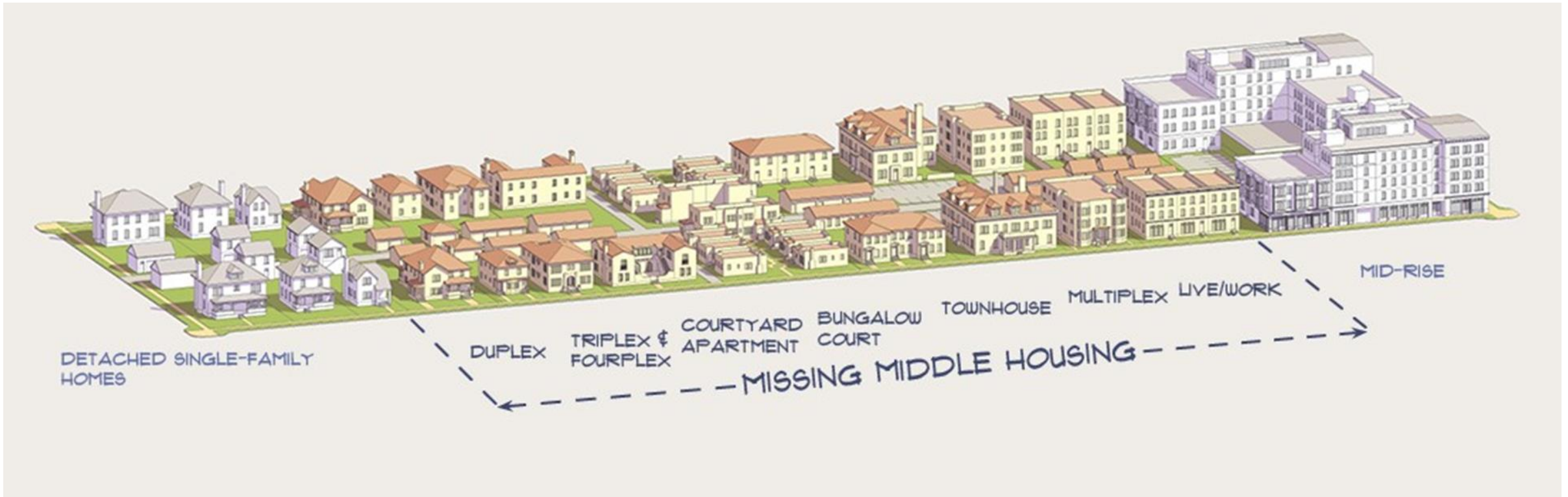
**\$2,319.77**

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<b>Occupation</b>	<b>Average Wage</b>
Management Occupations	\$109,420
Business and Financial Operations Occupations	\$66,420
Computer and Mathematical Occupations	\$69,080
Architecture and Engineering Occupations	\$71,800
Life, Physical, and Social Science Occupations	\$64,790
Community and Social Service Occupations	\$52,320
Legal Occupations	\$68,100
Educational Instruction and Library Occupations	\$48,780
Arts, Design, Entertainment, Sports, and Media Occupations	\$55,630
Healthcare Practitioners and Technical Occupations	\$87,780
Healthcare Support Occupations	\$30,810
Protective Service Occupations	\$54,450
Food Preparation and Serving Related Occupations	\$25,660
Building and Grounds Cleaning and Maintenance Occupations	\$31,930
Personal Care and Service Occupations	\$30,180
Sales and Related Occupations	\$39,910
Office and Administrative Support Occupations	\$39,960
Farming, Fishing, and Forestry Occupations	\$35,360
Construction and Extraction Occupations	\$51,460
Installation, Maintenance, and Repair Occupations	\$51,250
Production Occupations	\$40,950
Transportation and Material Moving Occupations	\$37,490

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# Missing Middle Housing



Missing Middle Housing is a range of multi-unit or clustered housing types compatible in scale with single-family homes that help meet the growing demand for walkable communities and diverse housing options along a spectrum of affordability. Missing Middle Housing provides a solution to the mismatch between the available U.S. housing stock and shifting demographics.

# MAKING A CASE FOR MULTI-FAMILY HOUSING DEVELOPMENT IN WATERLOO – Demographic Trends

	2010	2020
Average household size	2.48	2.09
Households with 4+ people	18.4%	10.1%
Householder living alone		32.9%
Households with no children <18		67.2%

# MAKING A CASE FOR MULTI-FAMILY HOUSING DEVELOPMENT IN WATERLOO – Housing Trends

<b>1-unit structures</b>	<b>64%</b>
<b>Number of Bedrooms</b>	74% have 2-3 bedrooms 11.5% have 4+ bedrooms
<b>Age of structure</b>	60% of existing structures built before 1980 26% of existing structures built before 1940

# Dempsey Property Proposed Development

- Duquaine Development – requesting ~ \$3,000,000 of TIF assistance



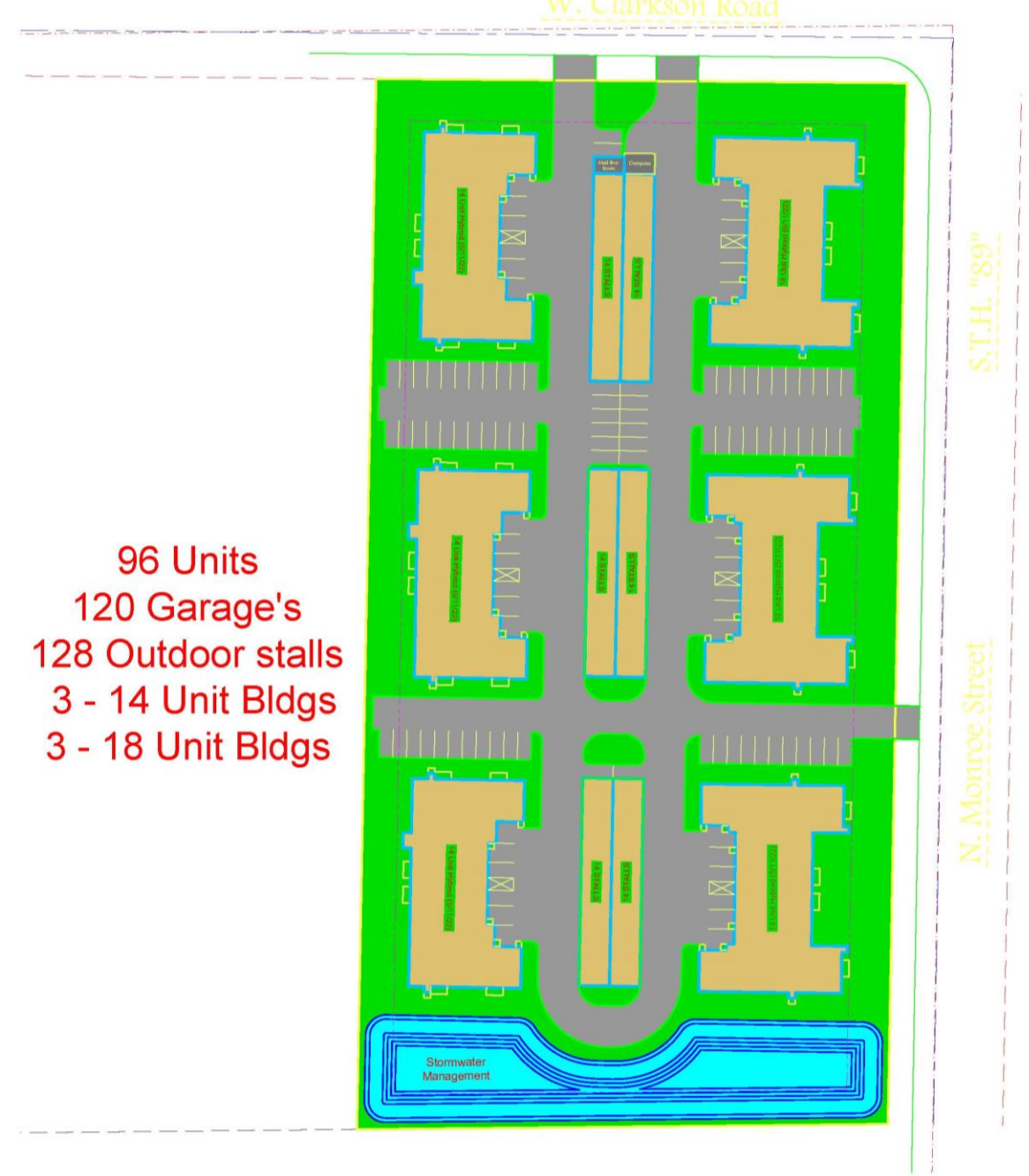
12 UNIT APARTMENT BUILDING

Architect: **Daniel J. Meissner**  
 AIA, LLC  
 dan@meissnerarch.com  
 505.228.2295

Design Consultant: **ONE LLC**  
 ONE LLC  
 305.546.1000  
 dan@oneinc.com

PROPOSED MULTI-FAMILY BUILDINGS FOR  
**DUQUAINE DEVELOPMENT**  
 WATERLOO, WISCONSIN

96 Units  
 120 Garage's  
 128 Outdoor stalls  
 3 - 14 Unit Bldgs  
 3 - 18 Unit Bldgs

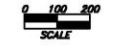


Waterloo Zoning Districts

- R-1 Single-Family Residential District 
- R-1A Single-Family Residential District 
- R-2 Single-Family Residential District 
- R-3 Mobile Home Park and Mobile Home Subdivision District 
- C-1 General Commercial District 
- C-2 Highway Commercial District 
- H Historic Overlay District 
- M-1 Limited Industrial District 
- M-2 General Industrial District 
- PD Planned Development District 
- A Agricultural District 
- CON Conservancy District 



- 8) MARILYN DEMPSEY  
200 W CLARKSON ROAD  
290-0813-0611-000
- 9) MATTHEW MCCUNN  
940 HERRON DRIVE  
290-0813-0613-033
- 7) LYLE BRAUNSCHWEIG  
1043 N MONROE STREET  
290-0813-0611-001
- 4) MARTHA GAY  
991 N MONROE STREET  
290-0813-0611-002
- 5) ROBERT HENSLER  
1023 N MONROE STREET  
290-0813-0611-003
- 6) KUHL ENTERPRISES  
1003 N MONROE STREET  
290-0813-0611-004
- 3) MARTHA GAY  
991 N MONROE STREET  
290-0813-0611-005
- 2) JAYSTONE PROPERTIES LLC  
N MONROE ST & ANNA ST  
290-0813-0523-062
- 1) LANNOY FAMILY PARTNERSHIP LLC  
810 N MONROE STREET  
290-0813-0523-054
- 9) WATERLOO SCHOOL DISTRICT  
785 N MONROE STREET  
290-0813-0614-000



REVISED: 11/18/2013  
SCALE: 1" = 200'

PROJECT: #2012M018	DATE: OCTOBER 2013	DRAWN BY: BAO	APPROVED BY: BAO
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CITY OF WATERLOO, WISCONSIN  
TID DISTRICT #4  
BOUNDARY & PARCEL MAP



**KUNKEL**  
engineering  
group  
107 Parallel Street  
Beaver Dam, WI 53916  
(920)306-9447  
Fax (920)306-9454

POB TID #4 BOUNDARY  
LEGAL DESCRIPTION

REDUCED 1/2

**TAX INCREMENTAL DISTRICT #4, CITY OF WATERLOO**



City of Waterloo, WI									
Tax Increment District No. 4									
Tax Increment Projection Worksheet - Development Incentive @ 60% of Increment									
Type of District	Mixed Use		Base Value	2,320,100		Appreciation Factor	0.00%		
District Creation Date	December 5, 2013		Base Tax Rate	\$21.44		Rate Adjustment Factor	0.00%		
Valuation Date	Jan 1, 2014								
Max Life (Years)	20								
Expenditure Period/Termination	15 12/5/2029								
Revenue Periods/Final Year	19 2034								
Extension Eligibility/Years	Yes 3								
Recipient District	No								

Construction Year	Value Added	Valuation Year	Inflation Increment	Total Increment	Revenue Year	Tax Rate	Tax Increment	60% Developer Incentive
10 2023	7,275,000	2024	0	7,275,000	2025	\$21.44	155,962	93,577
11 2024	0	2025	0	7,275,000	2026	\$21.44	155,962	93,577
12 2025	7,275,000	2026	0	14,550,000	2027	\$21.44	311,924	187,155
13 2026	0	2027	0	14,550,000	2028	\$21.44	311,924	187,155
14 2027	0	2028	0	14,550,000	2029	\$21.44	311,924	187,155
15 2028	0	2029	0	14,550,000	2030	\$21.44	311,924	187,155
16 2029	0	2030	0	14,550,000	2031	\$21.44	311,924	187,155
17 2030	0	2031	0	14,550,000	2032	\$21.44	311,924	187,155
18 2031	0	2032	0	14,550,000	2033	\$21.44	311,924	187,155
19 2032	0	2033	0	14,550,000	2034	\$21.44	311,924	187,155
<b>Totals (Revenue Years 2022 - 2034)</b>	<b>14,550,000</b>		<b>0</b>	<b>Future Value of Increment</b>			<b>2,807,320</b>	

Notes:  
Actual results will vary depending on development, inflation of overall tax rates.

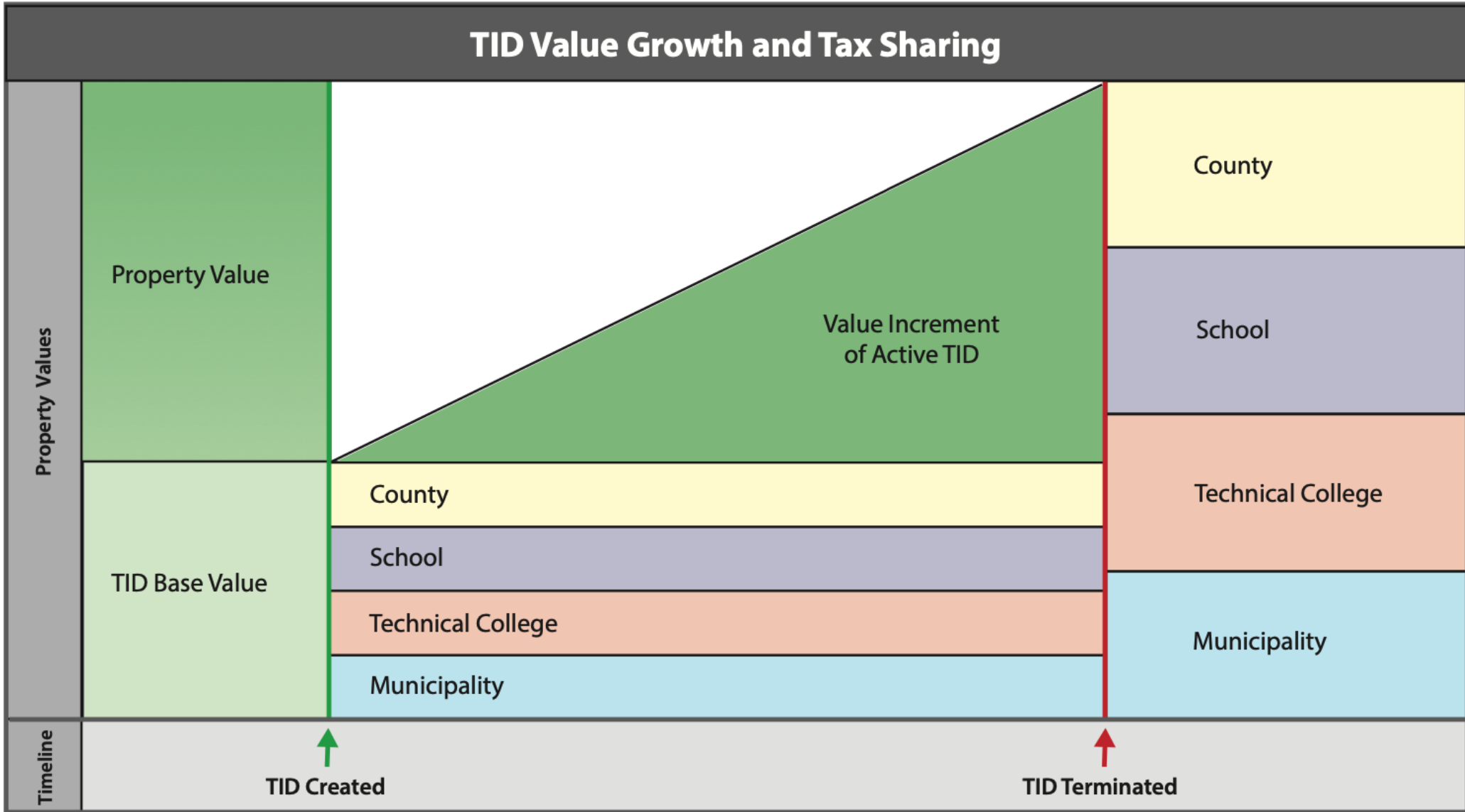
**TID 4 – New residential development**

- I have \$32,500 of administration charged through the life of the TID. \$65,000 for ED consultant and City Clerk divided in half. TID 4 share is \$32,500
- There was a DOR correction on this TID as well.
- New residential development at 97% of construction costs, divided between 2023 and 2025 construction years.
- TID can close successfully, but if the developer is provided 60% of the increment the incentive of \$3 million is not paid off by the closure date. Could extend the TID by 3 years, but this will still not pay the \$3 million incentive in full.
- City’s portion of increment revenue would accumulate to about \$1.4 by the end of the TID. This may not be enough to pay for improvements and the interest expense on borrowing to fund the projects.



# What is Tax Increment Financing?

- Key acronyms:
  - TIF → Tax Increment Financing (the tool)
  - TID → Tax Increment District (boundary where the tool is used)
- One of the strongest economic development tools in the State of Wisconsin.
- Allows municipalities to capture **incremental** *property tax revenue* from *growth* in defined area and use it to *benefit* that area.



Source: Wisconsin Department of Revenue



# Housing Development Costs



2022 retreat



# Rising Infrastructure Costs

## *Average Total Cost for a “Typical City Block” (330 feet)*

Avg cost per 330 ft	1998	2008	2016	2017	2018	2020
Total Construction	\$60,891	\$102,455	\$152,462	\$172,194	\$173,356	\$198,216
Costs Per Foot	\$185	\$310	\$462	\$522	\$525	\$601

## *Public infrastructure costs per lot based on per foot costs*

Infrastructure cost	1998	2018	2020
100' wide lot:	\$9,200	\$26,250	\$30,033
80' wide lot:	\$7,380	\$21,000	\$24,026
50' wide lot:	\$4,600	\$13,125	\$16,354

1998-2018 National inflation rate was 54.1%  
 1998-2018 Infrastructure inflation rate was 184.7%

2022 retreat



## City of Waterloo, WI

### Tax Increment District No. 5

#### Tax Increment Projection Worksheet - Development Incentive @ 60%

Type of District	Mixed Use		Base Value	2,320,100
District Creation Date	December 5, 2022		Appreciation Factor	0.00%
Valuation Date	Jan 1,	2023	Base Tax Rate	\$21.44
Max Life (Years)	20		Rate Adjustment Factor	0.00%
Expenditure Period/Termination	15	12/5/2038		
Revenue Periods/Final Year	20	2044		
Extension Eligibility/Years	Yes			
Recipient District	No			

Construction Year	Value Added	Valuation Year	Inflation Increment	Total Increment	Revenue Year	Tax Rate	Tax Increment	60% Developer Incentive	
	Tech College Ext.	0					0		
1	2023	7,275,000	2024	0	7,275,000	2025	\$25.82	187,819	
2	2024	0	2025	0	7,275,000	2026	\$24.78	180,241	
3	2025	7,275,000	2026	0	14,550,000	2027	\$24.07	350,215	
4	2026	0	2027	0	14,550,000	2028	\$24.07	350,215	
5	2027	0	2028	0	14,550,000	2029	\$24.07	350,215	
6	2028	0	2029	0	14,550,000	2030	\$24.07	350,215	
7	2029	0	2030	0	14,550,000	2031	\$21.44	311,924	
8	2030	0	2031	0	14,550,000	2032	\$21.44	311,924	
9	2031	0	2032	0	14,550,000	2033	\$21.44	311,924	
10	2032	0	2033	0	14,550,000	2034	\$21.44	311,924	
11	2033	0	2034	0	14,550,000	2035	\$21.44	311,924	
12	2034	0	2035	0	14,550,000	2036	\$21.44	311,924	
13	2035	0	2036	0	14,550,000	2037	\$21.44	311,924	
14	2036	0	2037	0	14,550,000	2038	\$21.44	311,924	
15	2037	0	2038	0	14,550,000	2039	\$21.44	311,924	
16	2038	0	2039	0	14,550,000	2040	\$21.44	311,924	
17	2039	0	2040	0	14,550,000	2041	\$21.44	311,924	
18	2040	0	2041	0	14,550,000	2042	\$21.44	311,924	
19	2041	0	2042	0	14,550,000	2043	\$21.44	311,924	
<b>Totals (Revenue Years 2023 - 2043)</b>							<b>0</b>	<b>0</b>	<b>Future Value of Increment 4,055,018</b>

Notes:  
Actual results will vary depending on development, inflation of overall tax rates.

## TID 5 – New residential development

- I have administration to pay for the new project plan and then I charged \$2,500 through the life of the TID.
- No other development is assumed and no potential City projects have been modeled.
- New residential development at 97% of construction costs, divided between 2023 and 2025 construction years.
- TID can close successfully, with the developer provided 60% of the increment as incentive up to \$3 million. Based upon the assumptions, the TID could pay the developer off by 2041 and have funds on hand to construct improvements.
- The available fund balance (City's portion of the increment revenue) that would need to pay for principal and interest on a loan to finance the projects would be approximately \$2.6 million.

# Proposal: Create TID 5 Overlay

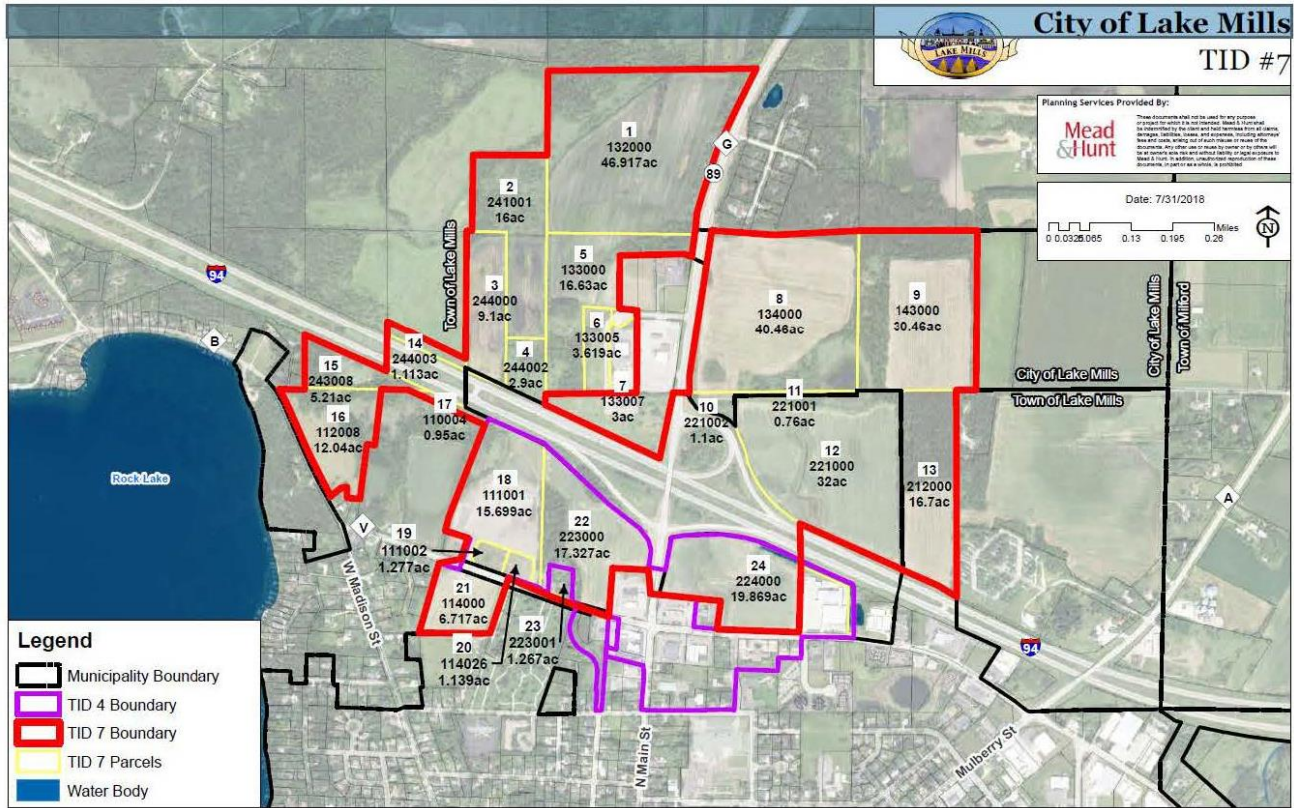
## TID 5 → Mixed-use

- Max life: 20 years
- At least 50% of district must be:
  - Industrial
  - Commercial
  - Residential
- Newly platted residential can only make up no more than 35% of district.

## TID Overlay Basics

- Boundary of one TID that covers another existing TID's boundaries.
- TID overlay district:
  - “freezes” property value of TID area it covers
  - TID overlay collects any new increment created within the district

## Example: Lake Mills – Mixed-Use TID #7



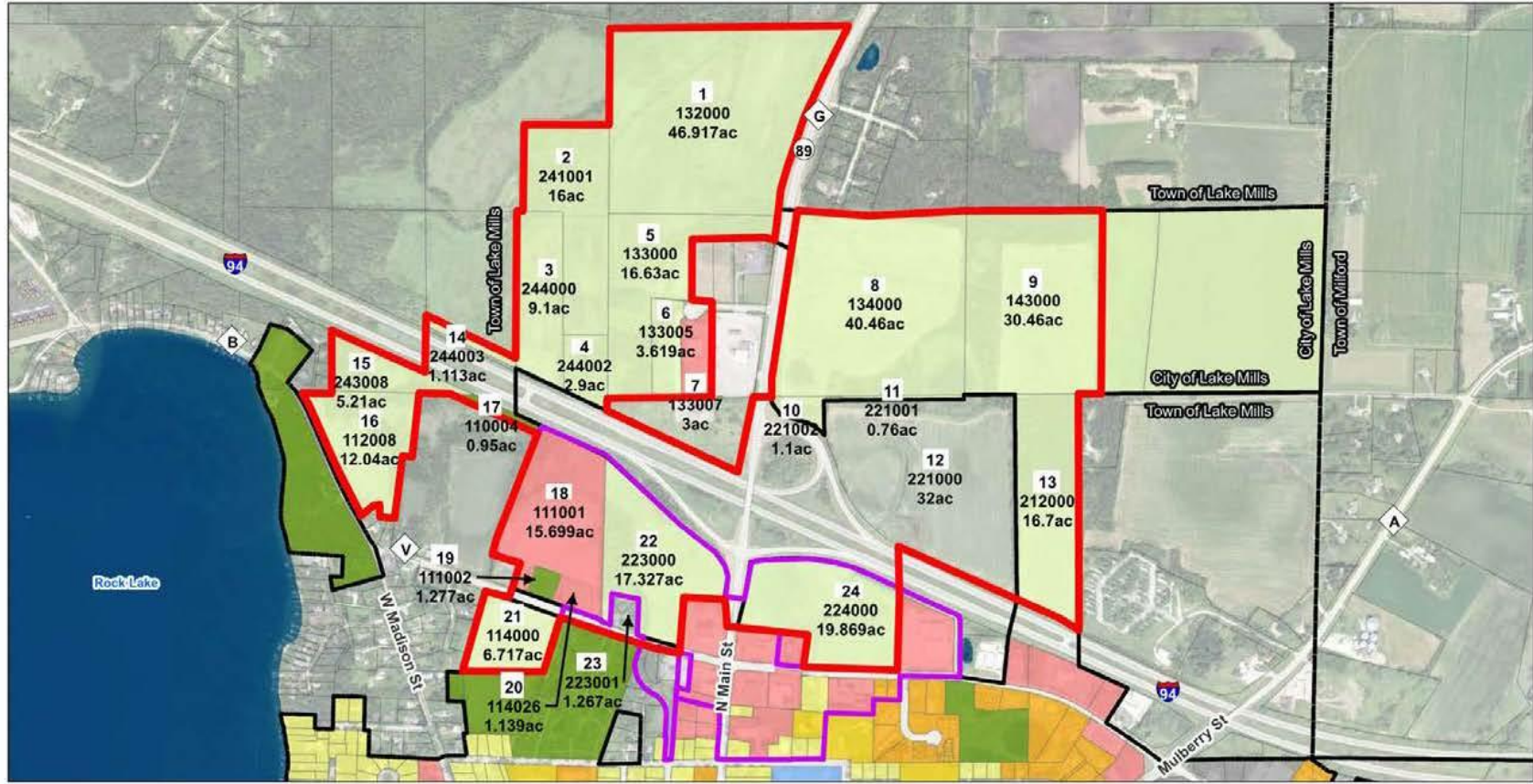
The City of Lake Mill’s adopted “Smart Growth” Comprehensive Plan incorporates the adopted Northside Neighborhood Plan for development of a 755-acre area north of I-94.

The Plan provides for a mix of development types including:

- Commercial
- Mixed residential/commercial areas
  - Single- and multi-family residential development

The plan provides detailed recommendations on a mix of single- and multi- family residences to serve a variety of household sizes, types, and incomes and includes specific recommendations on design and quality standards to ensure residential and commercial character in keeping with the City’s small town character and ensure connectivity throughout the northside.





**Legend**

Municipality Boundary	Parcels	AG	MF	I
TID 4 Boundary	Water Body	SF	C	Open Space
TID 7 Boundary		TF	CF	School

**City of Lake Mills**  
Map 2: Existing Land Use



Date: 8/7/2018




Planning Services Provided By:



These documents have been prepared by the City of Lake Mills and are intended for informational purposes only. They do not constitute a contract or any other legal instrument. The City of Lake Mills and Mead & Hunt are not responsible for any errors or omissions in these documents. The City of Lake Mills and Mead & Hunt are not responsible for any actions taken based on these documents. The City of Lake Mills and Mead & Hunt are not responsible for any actions taken based on these documents. The City of Lake Mills and Mead & Hunt are not responsible for any actions taken based on these documents.





MAP 4: PROPOSED DEVELOPMENT LAYOUT AND PUBLIC IMPROVEMENTS

