THREE VILLAGES COMMUNITY ASSOCIATION / ENDBRECK COALITION

Village of Big Bend | Village of Vernon | Waukesha County, Wisconsin

June 4, 2026

TO:

Jay C. Watson, Conservation Biologist — Advanced
Wisconsin DNR, Green Bay Service Center
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CC:

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RE: Urgent Request — Endangered Resources Review | Breck Athletic Complex | Tax Parcel BBV 2022999002 | Town Line Road & Highway 164 | Village of Big Bend, Waukesha County, Wisconsin

Dear Mr. Watson,

We are writing to you as members of the Three Villages Community Association and the EndBreck coalition — residents of the Villages of Big Bend, Vernon, and the surrounding area — to request your urgent attention and formal Endangered Resources Review of the proposed Breck Athletic Complex in Big Bend, Waukesha County.

We write to you specifically, Mr. Watson, because your work is the reason we know what is at risk here. Your decade of research on the Rusty Patched Bumble Bee — a species you have called "not an isolated incident" in its decline — and your documentation of Wisconsin's last remaining populations make you the person most qualified to understand what we are about to describe. The Village of Big Bend's own staff meeting notes from February 2026 identify a Rusty Patched Bumble Bee High Potential Zone on this property. No IPaC review was run. No ESA Section 7 consultation was conducted. The Village approved construction anyway. We are asking you to intervene before the habitat is gone.

We write to you specifically because the environmental threats posed by this project are not abstract. They converge on a single, unbroken ecological corridor that runs from the southeastern corner of this 150-acre development site directly through Mill Brook, into Vernon Marsh, and to the Mukwonago River — a Wisconsin-designated Outstanding Resource Water. The wildlife habitat, water quality, and federally protected species that depend on that corridor are at imminent risk. Construction could begin as early as this summer.

The OnWater waterway database (onwater.com) — a publicly available fisheries and waterway resource platform — lists Mill Brook as a named, documented 6-mile waterway with 4 confirmed aquatic species, positioned directly adjacent to the Breck development site. A screenshot of this listing, captured June 4,

2026, is attached to this letter as Exhibit A. This confirms that Mill Brook is a recognized, biologically active waterway — not a roadside ditch — and that its ecological value was completely absent from the developer's application materials.

A formal DNR complaint was filed with Travis Schroeder on May 18, 2026. This letter is a companion request directed specifically to your program, because what we are describing goes beyond stormwater permitting. It involves the potential destruction or degradation of habitat for federally endangered and state-listed species, the filling of jurisdictional wetlands that were never disclosed in the application, the discharge of synthetic turf pollutants at multiples of safe limits into a protected waterway, and the bathing of a wetland wildlife corridor in 727 kilowatts of 5,700K artificial light every evening of the competitive sports season.

No Endangered Resources Review was conducted before this project was approved. No IPaC review was submitted. No NHI Public Portal preliminary assessment is in the public record. The Village of Big Bend approved Phase 1 of this project on April 30, 2026 without any of these having been completed.

We ask that you conduct — or initiate — an Endangered Resources Review before any ground is broken.

THE SITE AND WHAT IT CONNECTS

The Breck Athletic Complex is a proposed $175–225 million, 150.49-acre multi-sport development on what is currently a soybean field at the intersection of Highway 164 and Town Line Road in the Village of Big Bend, Waukesha County (Tax Parcel BBV 2022999002). At full build-out, the site would include 20 synthetic turf athletic fields, 6 lighted competition baseball fields, batting cages, a 155,000-square-foot indoor turf facility, a championship baseball stadium, a banquet hall, a hotel, restaurants, and retail — all lit by 185 light poles, 791+ fixtures, and 727.87 kilowatts of electrical load operating until 10–11 PM nightly, seven days a week, April through October and beyond.

The ecological corridor at risk:

The southeastern corner of the 42-acre R-2 parcel — at the intersection of Big Bend Road and Skyline Avenue — connects directly to Mill Brook. Mill Brook flows west into Vernon Marsh. Vernon Marsh drains to the Mukwonago River, a Wisconsin Outstanding Resource Water under WI Admin Code NR 102.10.

This corridor is confirmed by multiple independent sources: the OnWater waterway database documents Mill Brook as a 6-mile waterway with 4 confirmed aquatic species (Exhibit A, June 4, 2026 screenshot); satellite aerial imagery on the same platform shows the Breck parcel immediately adjacent to the Mill Brook drainage basin with visible forested wetland depressions at the southeastern corner; and field photographs taken by EndBreck researcher Michelle Ristow in May 2026 document active wetland vegetation running along the Skyline Avenue boundary at that same southeastern corner.

This is not a theoretical drainage path. It is a continuous, functioning waterway and wetland corridor that has operated as an ecological buffer and wildlife movement zone for decades. The proposed development would place synthetic turf fields, lighted competition facilities, massive impervious parking areas, a banquet hall, and a hotel at the headwaters of that corridor — with a stormwater system that the developer's own engineering is not capable of containing.

PART ONE: THE STORMWATER SYSTEM WILL FAIL INTO MILL BROOK

We are not alleging this. The developer's own submitted engineering documents demonstrate it.

The model treats a fully developed 155-acre complex as if it is still a soybean field. ISG's HydroCAD stormwater model — submitted as the basis for Village approval — shows 0% impervious surface in both drainage areas. The developer's own drainage maps, submitted in the same package on the same date by the same engineer, show 18.3 acres of impervious surface. These two documents contradict each other. The model used for regulatory approval is wrong.

The soils cannot drain what is being proposed. Sixty-one percent of the site is Hochheim clay loam — HSG Group D soils that drain at 0.06 to 0.20 inches per hour. The HydroCAD model applied HSG Group B curve numbers — an error of 25–40% that makes the system appear 25–40% more capable than it actually is. All 70 soil borings were drilled on frozen ground between December 11, 2025 and January 21, 2026. The developer's own geotechnical firm (ECS) recommended field double-ring infiltrometer tests be conducted under non-frozen conditions. They never were. The entire NR 151.124 infiltration exemption used to avoid a more rigorous permit is based on estimates from frozen soil — not real data.

The system has no downstream model at all. Both stormwater discharge ponds route to "nonexistent nodes" in the computer model — the engineer's own output states this explicitly for every storm event from the 1-year through the 100-year. Highway 164 culverts, Skyline Avenue ditch, Mill Brook, Vernon Marsh, and the Mukwonago River were never modeled. The model stops at the property line and assumes the water disappears.

In a 100-year storm, one pond is 0.17 feet from overflow. The secondary overflow weir shows 0.00 cubic feet per second of flow in every modeled storm event — it has never activated. Waukesha County has experienced 100-year flood conditions twice in the past two years.

When this system overflows into Mill Brook, the pollutant load is catastrophic for the Mukwonago River ORW. Based on published synthetic turf and parking lot runoff literature, the development will generate:

Pollutant Source Projected Level Safe Limit Multiplier

Zinc Crumb rubber infill Up to 37 mg/L 5 mg/L 7.4×

Copper Brake pads / parking tires 0.05–0.30 mg/L 0.013 mg/L 23×

PAHs Crumb rubber Detected Near zero EPA probable carcinogens

PFAS Synthetic turf backing Detected Near zero Never breaks down

Road salt (Cl-) Parking de-icing 500+ mg/L 230 mg/L 2×+

Suspended solids All surfaces — first flush Up to 500 mg/L 25 mg/L 20×

pH Concrete leachate pH 9–11 pH 6.0–9.0 Toxic range

Wisconsin Admin Code NR 102.10 prohibits any increase in pollutant loading above existing background levels in an Outstanding Resource Water. No pollutant loading analysis was submitted. No analysis exists in the record showing these levels will not increase in the Mukwonago River. The Milwaukee Riverkeeper has been briefed on this situation.

PART TWO: THE WETLANDS WERE NEVER DISCLOSED

Two mapped DNR wetland polygons, totaling approximately 3.95 acres, sit on or immediately adjacent to Tax Parcel BBV 2022999002. Both have been in the Wisconsin DNR Wetland Inventory database since 2005–2007. Both are visible in the Waukesha County LIS Map Atlas — the same county GIS system used to file this application.

Neither was disclosed in the developer's stormwater submission. Neither was addressed in the Village approval record.

Wetland 1: Wetland ID 68423698589 — 1.98 acres — Code T3K — Palustrine Forested Broad-leaved Deciduous — Hydro Modifier: Wet soil, Palustrine. Located at the northwestern portion of the parcel, directly adjacent to the planned Stage 1 entrance road from Highway 164.

Wetland 2: 1.97 acres — Code F0Kf — Palustrine Forested — Temporarily Flooded — Diked/Impounded. Located at the southeastern boundary of the parcel, along Skyline Avenue — directly at the Mill Brook drainage outlet.

We respectfully note that the 3.95 mapped acres represent only what aerial photography from 2005–2007 could identify. Houghton Muck soils — a hydric soil — cover a substantial portion of this 150-acre site. The seasonal water table sits at or above the surface from September through June. Field photography taken by EndBreck Lead Researcher Michelle Ristow in May 2026 documents active cattail stands, emergent wetland vegetation, and hydric soil indicators at all four corners of the parcel — including directly at the Skyline Avenue / Mill Brook outlet at the southeast corner, and directly at the proposed Stage 1 construction access point on Highway 164 to the west.

An independent, boots-on-the-ground, spring-season wetland delineation has never been conducted on this site by anyone other than the developer's own consultant. The developer's delineation was submitted without independent DNR or Army Corps verification. The April 30, 2026 board transcript acknowledges that a DNR screening process is required before any land disturbance — but that screening has not been completed.

We have contacted the Army Corps of Engineers Brookfield District (615-290-5622) regarding potential Section 404 jurisdiction. The call was placed May 18, 2026 and a callback is awaited.

PART THREE: THE RUSTY PATCHED BUMBLEBEE — UNRESOLVED

Village staff meeting notes from February 2026 identify a Rusty Patched Bumblebee High Potential Zone on this property. This is the first bee listed as federally endangered under the Endangered Species Act.

Wisconsin holds some of the last remaining populations.

The source of the High Potential Zone designation in the staff notes has not been independently confirmed by the community — which is precisely why we are writing to you. No IPaC review was run for this parcel before approval. No NHI Public Portal preliminary assessment was submitted or required. No ESA Section 7 consultation was conducted. The Village approved Phase 1 without any of these steps occurring.

The habitat conditions on this site — native agricultural field edges transitioning to forested wetland islands, reed canary grass meadows, seasonal wildflower foraging resources — are consistent with documented Rusty Patched Bumblebee foraging and overwintering habitat. The proposed development would:

- Eliminate or convert the native meadow and forested wetland edge habitat across 150 acres
- Replace it with synthetic turf, impervious surfaces, and maintained athletic fields
- Introduce 727.87 kW of 5,700K artificial light operating nightly until 10–11 PM across the entire site and the adjacent Mill Brook / Vernon Marsh corridor — directly conflicting with IDA Model Lighting Ordinance recommendations of ≤3,000K near wildlife corridors
- Apply synthetic turf maintenance chemicals, herbicides, and de-icing agents to soils that currently support native pollinator foraging resources
- Generate tournament-weekend vehicle traffic of 3,000–6,000 visitors with associated pesticide, exhaust, and pollutant inputs

You have personally documented the Rusty Patched Bumble Bee at sites across Wisconsin, including a nest found in Milwaukee County in 2021 and new location confirmations in 2022. You have stated publicly that Wisconsin holds some of the last remaining viable populations of this species. You know better than anyone what suitable habitat looks like — and the site conditions we are describing, a 150-acre agricultural field transitioning to forested wetland edge with seasonal wildflower resources along all four perimeters, are exactly the conditions documented in RPB foraging and overwintering habitat research.

We ask that you run the USFWS IPaC tool for parcel BBV 2022999002 and evaluate whether a formal ESA Section 7 consultation is required before ground-disturbing activity proceeds. The Village's own staff notes flag a High Potential Zone on this property. That designation did not come from nowhere. If it is confirmed by an independent evaluation, approval of this project without ESA review would be a serious federal compliance defect — and the habitat it protects would be converted to synthetic turf, impervious parking, and 5,700K floodlighting before anyone could stop it.

PART FOUR: LIGHTING OVER THE WETLAND CORRIDOR

We draw your specific attention to the lighting footprint as it affects the Mill Brook / Vernon Marsh / Mukwonago River corridor, because this is not an issue that has received adequate attention in the approval process.

At full build-out, 185 light poles totaling 727.87 kilowatts will operate across a 150-acre site directly adjacent to Vernon Marsh — a functioning wetland system. All field lighting fixtures are 5,700K color temperature. The

IDA Model Lighting Ordinance recommends a maximum of 3,000K for fixtures located near wildlife corridors and Outstanding Resource Waters.

5,700K lighting is known to disrupt insect orientation, reduce nocturnal pollinator activity, disorient migratory birds, and suppress bat foraging behavior — all of which have documented cascading effects on the wetland food web that Vernon Marsh and Mill Brook support. No sky glow analysis was performed for either lighting plan. No ecological impact assessment of artificial light on the adjacent wetland corridor was submitted or required.

The lighting plans were also computed using pole heights 5 to 25 feet shorter than what the Village's own amended ordinance allows. The actual spill, sky contribution, and ecological impact at the permitted 85-foot pole height was never calculated.

PART FIVE: WHAT WE ARE ASKING

We ask that your program take the following steps before any earth-moving, grading, or land-disturbing activity begins at Tax Parcel BBV 2022999002:

1. **Conduct or require a formal Endangered Resources Review** for this parcel, including a complete NHI database check for all state and federally listed species, natural communities, and sensitive resources within the project area and its documented drainage corridor.

2. **Run the USFWS IPaC review** for this parcel to determine whether formal ESA Section 7 consultation is required for the Rusty Patched Bumblebee or any other federally listed species. The Village noted a High Potential Zone in its own records and took no follow-up action.

3. **Evaluate whether an independent wetland delineation is required** before any Section 404 or Section 281.36 permit can be issued, given that the developer's own delineation was not independently verified, both DNR-mapped wetland polygons were not disclosed in the application, and field evidence documents active wetland vegetation at all four parcel corners.

4. **Coordinate with Travis Schroeder** (NR Basin Supervisor, SE Region, (608) 438-9017) regarding the May 18, 2026 formal DNR complaint already on file, which documents the stormwater engineering failures and wetland disclosure failures in detail.

5. **Evaluate the artificial lighting proposal** under your program's wildlife corridor and ORW proximity standards, specifically the 5,700K fixture specification for 791+ fixtures adjacent to Vernon Marsh.

6. **Issue any required notices or holds** to the Village of Big Bend and developer Eric Weishaar / Breckenridge Landscape to prevent ground disturbance until these reviews are complete.

WHO WE ARE

We are residents of the Villages of Big Bend, Vernon, and surrounding communities. We are not opposed to youth sports. We are opposed to a project that was approved over documented engineering failures, undisclosed wetlands, an unreviewed federally endangered species designation, a stormwater system that cannot contain its own runoff, and pollutant loads that would discharge zinc at 7.4 times the safe limit, copper at 23 times the safe limit, and PFAS into a waterway that the law specifically prohibits from being degraded.

The wildlife that depends on Mill Brook, Vernon Marsh, and the Mukwonago River does not have a voice in a Village Board meeting. We are asking you to be that voice.

We are available to meet, to provide all documentation, and to walk this site with you at your convenience. All materials cited in this letter — engineering reports, DNR wetland inventory screenshots, field photographs, village meeting transcripts, the formal DNR complaint, and the case file compiled by our research team — are available upon request.

Thank you for your time, your expertise, and your commitment to Wisconsin's rare and irreplaceable species and natural resources.

Respectfully submitted,

Three Villages Community Association / EndBreck Coalition

Big Bend | Vernon | Waukesha County, Wisconsin

Founders: Jackie Trimborn | Crystal Hurd | John Pronschinske | James Schmittinger | Matthew Welter | Robert Stigler

Lead Research: Michelle Ristow

Community Attorney: Joseph R. Cincotta | (414) 416-1291 | jrc4@chorus.net

DNR Complaint on file: May 18, 2026 — Travis L. Schroeder (608) 438-9017

Army Corps contact made: May 18, 2026 — Brookfield District (615) 290-5622

EXHIBITS

Exhibit A: OnWater waterway database screenshot — Mill Brook, 6 miles, 4 confirmed aquatic species, Breck site plotted adjacent. Satellite panel shows forested wetland depression at SE parcel corner. Captured June 4, 2026. Source: onwater.com.

Exhibit B: DNR Wisconsin Wetland Inventory screenshots — Wetland Polygon T3K (1.98 acres, NW corner) and F0Kf (1.97 acres, SE corner/Skyline Ave boundary). Captured May 18, 2026 from Waukesha County LIS Map Atlas.

Exhibit C: Michelle Ristow field wetland photographs — 8 photographs, May 2026. Cattails, emergent wetland vegetation, hydric soil indicators at all four parcel corners including Skyline Ave SE boundary (Mill

Brook outlet).

Exhibit D: ISG HydroCAD model output — "Routed to nonexistent node NW C" / "nonexistent node WC C" — all storm events (1-yr, 2-yr, 10-yr, 100-yr). February 23, 2026.

Exhibit E: Three Villages Community Association formal DNR complaint filed May 18, 2026 to Travis L. Schroeder — full stormwater and wetland findings.

Exhibit F: Village of Big Bend staff meeting notes, February 2026 — Rusty Patched Bumblebee High Potential Zone notation and Poor House cemetery documentation.

All factual claims in this letter are sourced from public record: developer-submitted engineering documents, Wisconsin DNR Wetland Inventory (public database), Waukesha County LIS Map Atlas (public database), OnWater waterway database (public), Village of Big Bend meeting transcripts, and the ECS Geotechnical Report (Jan 26, 2026). No claim relies on inference.

APPENDIX: CASE BUNDLE UPDATE — ENV-6 (NEW FINDING)

ENV-6 | FAILURE | Mill Brook — Direct Drainage Connection from SE Corner of 42-Acre Parcel to Vernon Marsh Not Identified or Modeled

Facts: Google Maps satellite and street-level imagery confirms that Mill Brook originates at or near the southeastern corner of the 42-acre R-2 parcel at the intersection of Big Bend Road and Skyline Avenue — the eastern boundary of Tax Parcel BBV 2022999002. Mill Brook flows westward into Vernon Marsh. Vernon Marsh drains to the Mukwonago River Outstanding Resource Water (NR 102.10). This constitutes the complete, unbroken downstream drainage pathway from the development site to the protected waterway. Mill Brook is not referenced in the ISG stormwater submission, the HydroCAD drainage model, the PUD Narrative, or any developer-submitted document. Both stormwater discharge ponds in the HydroCAD model route to "nonexistent nodes" — the model stops at the property line. The actual first receiving water — Mill Brook — was never named, mapped, or analyzed for capacity, pollutant loading, or ecological sensitivity. DNR Wetland Polygon 2 (F0Kf, 1.97 acres, Palustrine Forested — Diked/Impounded) is located at the southeastern parcel boundary at Skyline Avenue — the precise geographic point where site drainage enters the Mill Brook corridor. Field photography by Michelle Ristow (May 2026, Image 7) documents large open wetland meadow with reed canary grass and wetland forbs at this southeastern Skyline Ave boundary, confirming active wetland connection to the Mill Brook drainage outlet.

Source: OnWater waterway database (onwater.com) — Mill Brook listed as 6-mile waterway, 4 confirmed aquatic species, Breck site plotted directly adjacent (screenshot captured June 4, 2026 — Exhibit A); satellite aerial on OnWater platform shows forested wetland depression at SE parcel corner consistent with Mill Brook headwaters; DNR Wetland Polygon F0Kf (1.97 acres, digitized 05/2007) at SE Skyline Ave boundary; Michelle Ristow field photo Image 7 (Skyline Ave SE corner, May 2026); ISG HydroCAD output (nonexistent node routing, all storm events); NR 102.10 Mukwonago River ORW antidegradation designation.

Legal Significance: The failure to identify Mill Brook as the primary receiving water for site drainage means the entire downstream pollutant loading analysis required under NR 102.10 was never performed. Any

increase in zinc, copper, PAHs, PFAS, chloride, suspended solids, or pH above background levels in Mill Brook constitutes a violation of the ORW antidegradation standard, triggering DNR enforcement authority under NR 216, NR 140, and s. 281.36. This finding strengthens ENV-1 and should be forwarded to Travis Schroeder as a supplement to the May 18, 2026 DNR complaint.

Action Required: Add Mill Brook to the formal DNR complaint as the named first receiving water. Request that DNR require a pollutant loading analysis for Mill Brook specifically, in addition to Vernon Marsh and the Mukwonago River. Coordinate with Army Corps regarding Section 404 jurisdiction over F0Kf wetland polygon at the Mill Brook confluence point.