

TOWN OF TRENTON
Official Minutes

**A Public Hearing of the Town of Trenton Town Board and Plan Commission was held
Monday, January 12, 2026, at 6:15 p.m. at the Town of Trenton
Town Hall, 1071 State Highway 33 East, West Bend, WI 53095.**

Chairman Mike Lipscomb called the Public Hearing to order at 6:15 p.m.

Town Board Members Present: Chairman Mike Lipscomb, Supervisor Barb Davies, Supervisor Tony Thoma.

Plan Commission Members Present: Doug Hein, Lee Kidney, Ray Werhand, Alternate Randy Wiskirchen. Excused: Scott Schweizer, Dennis Kay, Bob Roden.

Other Town Officials Present: Town Administrator/Zoning Administrator/Clerk Cindy Komro,
Members of the public: 58

Lipscomb read the Notice of Public Hearing, which was called to consider amendments to the Zoning Code of the Town of Trenton and to consider the draft of a Conditional Use Permit.
Summary: Petition to amend the Town of Trenton Zoning Map from EA Exclusive Agricultural District to AE Agricultural Enterprise District for Tax Key Numbers identified as T11_065200C and T11_064200D totaling approximately 141.34 acres. The amendment is requested to allow Applicant to apply for a Conditional Use Permit to expand its existing livestock facility under Town Ordinance Section 380-14C, Subsection (13) Livestock facilities of 1,000 or more animal units, by Conditional Use Permit, of which Rob n Cin Farms has applied for up to 2,500 animal units.

Public Comments:

John Jansen, 5939 Wausaukee Road: I have prepared written comments that have already been shared. I have been an expert witness for several townships that are reviewing CAFO permits. I know what will happen. The WPDES permit that has been granted to Rob n Cin Farms has been sent to an administrative hearing. From my experience, once it has been sent to an administrative hearing, it will likely be changed. The result of the administrative hearing may take months or even years to resolve. There is no need to rush this.

Jay Koenitzer, 6262 Congress Drive: I sent an email to the Plan Commissioners, indicating my opposition to the expansion of the farm. This one operation will have significant impact on a large number of people, specifically, the risk to private wells in the area. Please do what is right for the entire community.

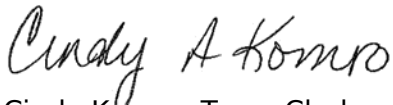
Rick Roden, 5579 Cty Hwy Y: We currently have a CAFO permit as of October 1. The reason it took longer than expected is that we had to add two additional sites. Our animal units (AUs) increased in total, because we have young stock on the other sites, outside the Town of Trenton. The Trenton site will not exceed 2,500 AUs. An animal unit is not "a cow," it is based on weight.

John Falk, 1747 Terry Dale Drive: I have been a dairy farmer in Trenton my whole life. Thanks to the Plan Commission for their hard work. As a local person, I ask the Plan Commission "Why would we as dairy farmers want to do something to pollute the water? Why would we want to hurt the people in the area? We eat the same food and drink the same water" We do our best to take care of the people, water, and resources in the area. There are not a lot of dairy farms in the area anymore. We want to do our best.

Dr. Jeff Halverson, 6691 Lovers Lane Rd: I have been a dairy veterinarian in the area since 1989 and a resident in the Town since 1993. Since I've been here, the farms in the Town of Trenton are all family farms, third generation (for example: Groths, Schaefers, Fals, Rodens). All these used to be "stanchion" farms, using typical Wisconsin red barns with stanchions. This brings us to cow comfort. Modern dairy cows are too big (too tall, too long, too heavy, and their metabolic rates are so high, it is almost impossible to ventilate these barns. The new barns are designed for cow comfort, with free stalls. Farmers do not want to hurt anything, they just want to provide good food.

Lipscomb adjourned the Public Hearing at 6:27 p.m.

Respectfully submitted,

A handwritten signature in black ink that reads "Cindy A Komro". The signature is written in a cursive, flowing style.

Cindy Komro, Town Clerk

Written comments submitted by the public are attached as part of the record.
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Affidavit of Posting: These minutes were approved at the January 19, 2026 Town Board meeting and the February 9 2026 Plan Commission meeting and posted on the Town website on February 10, 2026.

Joan<jbnewburg@aol.com>

TownAdmin

1/10/2026

Town of Trenton Plan Commission and Town Board:

Re: Resolution Z2026.01.04, Recommendation to Town Board regarding Zoning Map Amendment from EA Exclusive Agricultural to AE Agricultural Enterprise: Rob n Cin Farms LLC, 5545 County Hwy Y (parcels T11_065200C, T11_064200E totaling 141.37 acres) AND Resolution Z2026.01.05, Recommendation to Town Board regarding Conditional Use Permit Application for Livestock Facility of not more than 2,500 Animal Units: Rob n Cin Farms LLC, 5545 County Hwy Y (parcels T11_065200C, T11_064200E totaling 141.37 acres)

I, Joan Baumgartner, resident of Town of Trenton do hereby oppose both the rezoning of the lands owned by Rob N Cin Farms LLC and the conditional use permit as referred to above for the following reasons.

Environmental reasons:

The business operation operated by Robert and Cindy Roden is situated in an area that is highly susceptible to nutrient contamination of ground water due to high water tables, the degree and amount of permeable soil types, topography, sizable amount of wetlands, proximity to the Cedar Creek navigable waterway, and proximity to the environmentally critical Cedarburg Bog. This operation currently has over 1700 animal units and there are no monitoring wells in areas of high ground water.

The current lack of monitoring wells indicates the lack of concern the current operator has over the potential environmental impacts his business may cause to our waterways or ground water. There is a lack of financial resources for the Town, County or State of Wisconsin to monitor this site or any guarantees that there will be no or even limited contamination of soils, air and most importantly the water supply and waterways of our community and our neighbors. This is why I oppose this application for rezoning AND conditional use permit. The Roden business is currently non-compliant and there is little to no history of this operator's intent to follow what will be required by the Town, County or State to operate in this location.

Decline of property values and decline of quality of life for the surrounding community:

CAFOs significantly lower property values in nearby areas due to negative impacts on air and water quality, unpleasant odors, amount of industrial noise levels. I live just over a mile away. Personally, during fall nights I hear the dryer fans run all night long. It is a constant metallic humming sound. Then in spring instead of begin able to open windows, I keep them shut for several weeks after the contents slurry tanks are dispersed on neighboring fields. It is not the same smell as fresh manure nor does the smell dissipate as quickly as fresh/unfermented manure. If any of the plan commissioners lived in the area, they would know this is true. Hence, Research indicates a statistically significant relationship between the proximity of CAFOs and declines in property values. The majority of Town residents that live in this area have been here for decades and no one investing in Trenton by purchasing a home for their family would be in favor of this UNLESS they are in someway profiting by this business. I for one do not and can speak honestly to this issue.

Farming has been part of our community since the 1800's. Traditionally farms are family owned and peacefully coexist with their neighbors. Since moving to this community I have worked with smaller family farms who respect the land and community. Currently I lease over 30 acres for farming. I support the tradition of family farming. CAFO's are industrial operations and should be treated and appropriately located to minimize their impact on this community. ROB N CIN FARMS LLC, is not a Town of Trenton tradition. NOR is EA Agricultural Enterprise part of the approved Trenton Comprehensive Land Use Plan.

Sincerely yours
Joan Baumgartner
5900 Wausaukee Rd
West Bend, Wi. 53095

Linda Baumgartner<lbaumgar@yahoo.com>

Chairman;Supervisor Davies;Supervisor Thoma;+7 others

Dear Members of the Town Plan Commission and Town Board,

I am writing to formally express my strong opposition to the proposed re-zoning to AE and the conditional use permit for the lands owned by Rob N Cin Farms LLC as listed here.

(Resolution Z2026.01.04, Recommendation to Town Board regarding Zoning Map Amendment from EA Exclusive Agricultural to AE Agricultural Enterprise: Rob n Cin Farms LLC, 5545 County Hwy Y (parcels T11_065200C, T11_064200E totaling 141.37 acres

Resolution Z2026.01.05, Recommendation to Town Board regarding Conditional Use Permit Application for Livestock Facility of not more than 2,500 Animal Units: Rob n Cin Farms LLC, 5545 County Hwy Y (parcels T11_065200C, T11_064200E totaling 141.37 acres)

While I understand the importance of agriculture to our local and regional economy, CAFOs pose well-documented risks that far outweigh their benefits—particularly for rural towns like ours. These operations threaten groundwater and surface water quality through manure runoff and leakage, increase air pollution from ammonia and hydrogen sulfide emissions, and contribute to persistent odors that significantly reduce quality of life for nearby residents.

In addition, CAFOs often place heavy burdens on local infrastructure, including roads and emergency services, while providing limited long-term economic benefit to the broader community. Property values near CAFOs frequently decline, and small family farms are put at a competitive disadvantage by large-scale industrial operations.

Of particular concern is the risk to our drinking water. Once groundwater is contaminated, remediation is costly, difficult, and sometimes impossible. Protecting clean water for current residents and future generations should be a top priority for the Town.

I respectfully urge you to consider the long-term environmental, public health, and economic impacts of this proposal and to deny both the rezoning and conditional use permit. At a minimum, I ask that the Board require comprehensive environmental review, meaningful public input, and strict safeguards that fully protect our community.

Thank you for your time, your service, and your careful consideration of this matter. I hope you will act in the best interest of our town and its residents.

Sincerely,

Linda Baumgartner
Long Time Resident, Town of Trenton

Greg and Megan Claypool<gmclaypool@sbcglobal.net>

TownAdmin

Dear Mrs. Komro,

We are strongly opposed to the expansion of Roden's Farm. The expansion will require groundwater monitoring for our well and will contaminate the air with toxic smells and chemicals from the spreading of manure. Granville Road already has an abundance of truck traffic to and from Roden's and additional traffic will further disrupt our ability to safely come and go from our home. Please overturn the approval of the CAFO permit.

Sincerely,

Greg Claypool

Community Opposition Letter

WPDES Permit No. WI-0067409-01-0 - Rob-N-Cin Farms LLC

James Salscheider
Phone: (920) 367-3007
James.Salscheider@Wisconsin.gov

Dear Mr. Salscheider,

We are families living along Highway Y and surrounding neighborhoods near the Rob-N-Cin (The Roden Farm) in the Town of Trenton and Town of Saukville, writing together to strongly oppose WPDES Permit No. WI-0067409-01-0 for Rob-N-Cin Farms LLC. There are more than 50 families living within one mile of this operation, all depending on wells for our drinking water, and we represent many of the adults and children who are directly impacted by this facility every single day.

The fundamental question the DNR must answer is: Is this an appropriate location for an industrial farm? With more than 50 families living within one mile of this operation - many in subdivisions that have been established for over 30 years - this is a well-established residential area. Industrial farms producing 19 million gallons of liquid waste annually simply don't belong in neighborhoods where dozens of families have been raising children for decades.

This Is Not an Appropriate Location for Industrial Agriculture

The core issue here is land use compatibility. When most of us moved to this area, Rob-N-Cin was just a normal family farm with under 500 animal units that fit into our rural residential community. We chose this neighborhood specifically because we wanted our families to grow up with clean air, safe water, and the peaceful countryside that Wisconsin farm communities are known for. What we're facing now is completely different from what we signed up for.

Over the past four years, we've watched Rob-N-Cin more than double their herd size and expand their facilities - all without getting the required permits that Wisconsin law demands. Now they want to nearly triple their operation to almost 3,000 animals, which means going from about 9.5 million gallons of liquid manure per year to 19 million gallons spread on fields surrounding our homes.

The DNR must consider whether it's appropriate to permit an industrial-scale waste operation that will impact more than 50 family's wells and quality of life living within one mile of the farm. This density of residential development makes this location fundamentally incompatible with large-scale agricultural waste disposal.

Our Community Already Suffers from Current Operations

We're already struggling with their current operations. During manure spreading seasons, the smell is so overwhelming that entire families are trapped inside our homes for days at a time. We can't open windows, can't let children play outside, and have had to cancel outdoor gatherings and family events because the air is simply unbreathable.

The proposed expansion would include a massive 6-million-gallon manure pit that will create odors affecting our air quality for miles around our homes. This industrial-scale waste storage facility will emit hydrogen sulfide and ammonia continuously, degrading air quality throughout our residential area. The scale of this waste storage is incompatible with a neighborhood where families should be able to open their windows and enjoy their property.

Many adults and children in our neighborhood develop sore throats and coughs during spreading and manure hauling seasons. These respiratory symptoms affect multiple families and have become a regular occurrence that we simply shouldn't have to endure in our own homes.

Our Wells and Drinking Water Are in Immediate Danger

What scares us most is the threat to our drinking water. All the residents in our community rely on private wells, and many of us are located directly downhill from the proposed spreading fields. The Wollner Fields and Meyer Fields where they want to spread massive amounts of liquid manure are located uphill from our entire neighborhood. When it rains, everything flows directly toward our wells.

We have real evidence of these risks right here in Washington County. In 2011, the Falk dairy farm near West Bend contaminated neighboring wells when they spread liquid manure from just 600 cows - even while following an approved nutrient management plan. The Wisconsin DNR confirmed that manure leached into wells, making them unusable. A child was hospitalized from exposure to the contaminated water.

The contamination was so severe that residents had to drill new wells, some up to 600 feet deep to get below the contamination. The affected neighbors sued the Falk farm for damages in a lawsuit that dragged on for years before being settled. Meanwhile, when Falk's insurance company refused to cover the well contamination costs, Falk sued their insurer. In *Wilson Mutual Insurance Co. v. Falk*, the Wisconsin Supreme Court ruled that farmers are legally responsible for well contamination from their manure operations, even when following approved nutrient management plans.

This local case proves that manure contamination of wells is not theoretical - it's a documented reality that destroys families' drinking water, requires expensive remediation, and creates years of legal battles. That operation had only 600 cows. Rob-N-Cin wants nearly five times that many animals producing 20 million gallons of waste annually.

Scientific studies show manure application significantly increases microbial leaching into groundwater, with contamination persisting for more than 93 days after application. Our area's shallow soils with silty-clay characteristics and fractured bedrock create conditions that "promote very rapid groundwater transport," making us particularly vulnerable to contamination that can reach our wells within days of application.

Why the Meyer and Wollner Fields Must Be Completely Protected

We're particularly demanding that the DNR prohibit any liquid manure spreading on the Meyer and Wollner Fields because they pose the greatest direct threat to our neighborhood wells. These fields are:

- Within 200 feet of multiple family wells that serve households with families
- Located where waterflow charts show drainage directly toward our water sources
- Situated on soils that don't adequately filter contaminants before they reach groundwater
- In an area with shallow, fractured bedrock that allows rapid contamination of our aquifer

If liquid manure is applied to these fields, contamination will flow directly into the groundwater that supplies drinking water to our families. This isn't a theoretical risk - it's an immediate threat to families who have no alternative water source.

We shouldn't have to wonder if the water coming out of our kitchen taps is safe for our families' drinking water. The Meyer and Wollner Fields are simply too close to our homes and too dangerous to our wells to allow industrial waste spreading.

Dangerous Truck Traffic Through Our Neighborhoods

The truck traffic through our residential streets has already become dangerous and will get much worse. Heavy manure trucks carrying 8,000 gallons each already make around 2,000 trips annually through our neighborhood during spreading and transportation seasons. These 80,000-pound vehicles create hazardous conditions for drivers, school buses, and pedestrians on narrow country roads that were never designed for this kind of industrial traffic.

What makes this particularly dangerous is that Rob-N-Cin only has about 450 acres near the farm, which means most of their massive manure production - nearly 20 million gallons annually - must be hauled by truck to distant spreading fields. Most of this liquid waste must travel through our residential roads in these massive tanker trucks.

During manure transportation and spreading seasons, our roads become industrial trucking routes where families are afraid to drive, school buses struggle to navigate safely around these huge vehicles, and pedestrians are at constant risk. Several of us have had close calls with these heavy manure trucks, and we're terrified that it's only a matter of time before there's a serious accident involving a family or school bus.

This Farm Has Broken the Law Repeatedly

What makes this situation even more frustrating is that Rob-N-Cin has been operating illegally for over two years without the required WPDES permit. They've shown a pattern of disregard for environmental regulations that makes us question whether they can be trusted to operate responsibly with nearly 3,000 animals.

The DNR's own records show they've had manure pit overflows with runoff going into surrounding ditches. It was discovered that Rob-N-Cin has been hauling manure to undisclosed manure pits that were not reported on their permit application. They admitted to transferring over 6 million gallons of manure to these secret facilities since 2020, operating without proper oversight or environmental permits. When the DNR finally inspected these undisclosed sites in December 2024, they found serious violations including liquid manure flowing into roadside ditches that drain toward Mole Creek, a trout stream.

By concealing these satellite operations from the DNR during the permit application process, Rob-N-Cin demonstrated deliberate deception about the scope of their operations. Additionally, they are violating local zoning regulations in the Town of Trenton, showing a pattern of disregard for both state environmental law and local land use ordinances. Why should our community trust an operator with this documented history of deception and violations at multiple levels of government?

Our Property Values Are at Stake

Our homes represent our families' biggest investments and our retirement security. Real estate professionals report that homes near large livestock operations lose 6-26% of their value. With home values in our neighborhood ranging from \$400,000 to \$1.4 million, each of our families could potentially lose \$24,000 to \$364,000 or more.

We've already noticed that homes in our area are staying on the market longer as awareness of the expanding operation spreads. Several potential buyers have walked away after experiencing the odors during spreading season or seeing the constant truck traffic. It's simply not fair that families should absorb these massive financial losses so one company can expand their waste disposal operation.

The Cedarburg Bog Cannot Survive This

Several of the spreading fields, including the Birchwood and Hulk Fields, flow directly into the Cedarburg Bog State Natural Area - one of Wisconsin's most precious natural resources and a globally rare ecosystem that's been protected since 1952. Spreading 19 million gallons of liquid manure annually in areas that drain into the Bog will cause irreversible nutrient pollution and destroy this irreplaceable natural heritage that belongs to all Wisconsin residents.

Many of our families regularly visit the Bog for hiking, bird watching, and nature education. This beautiful, unique ecosystem deserves protection from industrial contamination.

This Affects Our Entire Community

This issue extends far beyond just the immediate neighborhood around the farm - it affects our entire community. In 2024, more than 850 residents of the Town of Trenton and Town of Saukville signed a petition opposing this facility's expansion to CAFO status. This level of opposition reflects the widespread community concern about the damage already being done and our shared understanding that tripling the operation would be catastrophic for our entire region.

The impacts of this operation ripple throughout our communities - from air quality degradation that affects residents' miles away, to truck traffic on rural roads used by families throughout the townships, to threats to shared water resources that serve the broader area. Most recently the fan noise from the farm can be heard for miles. This isn't just a problem for

those of us living closest to the farm - it's a community-wide crisis that demands community-wide protection. With a permit this farm will be granted to grow to any size and our community problems will continue to grow because of this farm's factory operation.

Our Area Is Rapidly Developing

We are asking the DNR to deny this permit outright, but if the agency is determined to allow this farm to become a CAFO, we demand they limit the animal units to under 999 - the maximum this operation can demonstrate it can responsibly handle without requiring WPDES permit oversight.

Rob-N-Cin has failed to prove they have adequate land base for their proposed expansion. They cannot verify they have proper leases for many of their proposed manure spreading fields, violating Wisconsin Administrative Code NR 243.14(2)(a) which requires spreading acreage to be "available and under control of the operation." With only 450 acres available near the farm, they are proposing an industrial operation that far exceeds their actual capacity.

Furthermore, our area is developing rapidly as part of the greater Milwaukee region's growth. Washington County has seen a 36.7% increase in single-family housing permits in 2025 alone, with 143 new permits issued so far this year. Saukville experienced five-fold population growth between 1950 and 1980, and development continues accelerating with Milwaukee just 25 miles south. The construction of Interstate 43 connected our communities to Milwaukee's suburban expansion, and Washington County is actively pursuing its "Next Generation Housing" initiative to build 1,000 homes over the next decade.

This is no longer a rural agricultural area - it's a rapidly developing residential region where industrial agricultural operations simply don't belong. The incompatibility between Rob-N-Cin's proposed 2999-animal industrial waste operation and our growing residential communities makes this expansion fundamentally inappropriate for our changing landscape.

What We're Demanding from the DNR

We call on the DNR to deny WPDES Permit No. WI-0067409-01-0 outright based on:

- The documented pattern of illegal operation and regulatory violations
- The unacceptable risks to our neighborhood drinking water wells
- The threats to the irreplaceable Cedarburg Bog State Natural Area and Milwaukee River Basin
- The failure to adequately review environmental impacts near State Natural Areas
- The ongoing operation of unpermitted satellite facilities with documented violations

If the DNR refuses to deny the permit completely, we absolutely demand that you:

Prohibit all liquid manure spreading on the Wollner Fields 1 and 2 and all Meyer Fields - these fields pose direct, unacceptable contamination risks to our neighborhood wells and our families' drinking water.

Additionally, we demand:

- Limit the operation to its current size and prohibit any expansion beyond the existing animal units - this is the maximum scale compatible with the limited 450-acre land base near the farm and appropriate for our residential neighborhood
- Require the comprehensive WEPA environmental study mandated by state law under Wisconsin Statute § 1.11 for operations near State Natural Areas
- Require comprehensive groundwater monitoring wells between spreading areas and our homes
- Establish mandatory 1,000-foot setbacks from all State Natural Area boundaries
- Independently verify all land leases before allowing any nutrient applications
- Require financial assurance for potential well contamination cleanup and property value losses

Our Bottom Line

When we moved to this area along Highway Y, Rob-N-Cin was a family farm with under 500 animal units that belonged in our rural community. The proposed expansion to nearly 3,000 animals represents an industrial waste disposal operation that has no place in an area where more than 50 families are raising children within one mile of the facility.

The DNR has a responsibility to consider land use compatibility when issuing permits. Industrial farms belong in industrial areas - not in residential neighborhoods where dozens of families depend on well water, where people chose to live for clean air and peaceful surroundings, and where established subdivisions have existed for over 30 years.

We chose to raise our families in a farming community, and we respect Wisconsin's agricultural heritage. But there's a fundamental difference between the family farm we moved next to and the industrial facility they want to become. Small family farms don't require millions of gallons of liquid waste disposal that impacts our quality of life and health.

We deserve to breathe clean air and drink safe water. Our wells deserve protection from industrial contamination. The Cedarburg Bog deserves protection from irreversible damage. Our community deserves protection from an operation that has already shown it cannot follow the law.

We urge the DNR to stand with Wisconsin families and protect our community by denying this permit.

Thank you for your consideration of our concerns.

Sincerely,

Families Living Along Highway Y and Surrounding Areas:

We, the undersigned residents of the Town of Trenton and Town of Saukville, Wisconsin, hereby formally object to and oppose WPDES Permit No. WI-0067409-01-0 for Rob-N-Cin Farms LLC. By affixing our signatures below, we affirm that:

1. We are residents directly affected by this proposed operation
2. We have read and agree with the contents of this opposition letter
3. We formally request the Wisconsin Department of Natural Resources to deny this permit
4. We authorize this letter to be submitted on our behalf as our official public comment

Signed this 11 day of August, 2025:

Regards,

Emily and Chris Kearns
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Tony Cypcar<cypcart@gmail.com>

James.Salscheider@wisconsin.gov <james.salscheider@wisconsin.gov>

TownAdmin

I am unable to attend this very important hearing but I would like to express my concerns. Everyone understands the importance the farmer plays in society, but with such great importance comes great responsibility. I am all for small farms but CAFO farms are simply not sustainable in populated areas as in Washington and Ozaukee county. Much like nuclear electricity production, there is no place to properly dispose of the waste without endangering the general population. Once you can no longer drink or use your own ground water, or can't stand the smell, it will be time to abandon your property. For those of us who live here, we see all summer long from the manure trucks dumping in many more fields than those that Roden uses. Roden is just going to greatly add to an already growing problem and I would like to see this controlled.

John J<jrj5939@gmail.com>

Chairman

tony.thoma@washcowisco.gov;Supervisor Davies;+6 others

Please find my comments on the proposed rezoning of the Rob 'n Cin farm for tonight's planning commission meeting. The most important points of my comments are that Rob 'n Cin's WPDES permit application to the state is being contested by a group of Trenton residents. The concerns they raised were serious enough for the state to suspend the proposed permit and plan a contested case hearing on the permit.

I have been an expert on several contested case hearings on CAFOS in Wisconsin and other states. This experience has shown me that if a permit goes to a contested case hearing, there are credible concerns over the completeness of the information submitted to support the permit. It will be several months to probably one to two years before this case is decided. There will likely be significant restrictions and monitoring requirements put into any new permit granted that are needed to protect human health and the environment.

The conditions may make the proposed expansion uneconomic. In the meantime the existing permit is locked in place and any potential changes are frozen. Any zoning changes granted by the Town now may be irrelevant or in conflict with the terms of the final permit. Any action at this time may be a waste of time and only complicate the issue. The Town should postpone any decision on the rezoning until the contested case is over and use the time to include the will of their residents in this decision. The Town should:

- Force the applicant to comply with their existing zoning to set a precedent of fair and equal application of zoning laws,
- Set up a citizen's committee to inform the residents on the matter, solicit public opinion, and craft an operational ordinance that will protect the property rights of all land owners, not just one member of the planning commission,
- Protect their legal authority to enforce zoning laws by not setting a precedent unequal enforcement by rolling over for one connected citizen.

I hope you have time to read my comments. The letter references previous letters to the Town and WDNR with more background information. You should already have copies of these but I will send you copies if you are interested. There will be new information shared as the contested case hearing progresses that will reinforce the previous information shared with you.

Please table the rezoning application until after the contested case hearing is resolved. The Town has nothing firm to consider until the final WPDES permit is awarded and appears to be following orders from one influential citizen. In the interim, the Town does have a chance to demonstrate its regulations are to be taken seriously and no one is above enforcement by forcing Rob 'n Cin to comply with their existing zoning and press for fines as a deterrent for other potential violators and to offset the trouble and cost caused by the applicants flagrant disregard for the law.

Please slow this down and let the people speak.

January 12, 2026

Mr. Mark Lipscomb
Chairman
Town of Trenton
Via Email:Chairman@townoftrenton.wi.gov

John Jansen
5939 Wausaukee Rd
West Bend, WI 53095
jrj5939@gmail.com

RE: Proposed Rezoning of the Rob 'n Cin Farm from EA to AE

Dear Mr. Lipscomb, members of the Planning Commission, and Town Board,

I wish to express my concerns over the proposed rezoning of the Rob 'n Cin Farm from EA to AE zoning. I am a professional hydrogeologist with over 40 years of experience, and I have been an expert in litigation over several Concentrated Animal Feed Operations (CAFOs) in Wisconsin and surrounding states. I am familiar with the matter at hand, and I believe the Town is rushing to pass zoning in a matter that is far from settled and risks passing zoning that will be inconsistent with the final permitted operation of the farm.

The farm was shown to be exceeding their permitted animal unit (AU) limits by the WDNR in 2023 and has been operating outside of its limits for at least 3 years. Given the applicant's documented history of non-compliance with regulations, this action is likely to place the health and quality of life of residents in both the Town of Trenton and the Town of Saukville at risk, damage the environment of the area, waste time and resources of the Town, and complicate enforcement actions from the State of Wisconsin against an applicant who has flagrantly ignored his permit restrictions for at least three years

The Rob 'n Cin farm has been operated by the Roden family in the Town of Trenton since about 2005 and it is permitted under Exclusive Agriculture (EA) zoning, with a limit of 1,000 AU (approximately 714 cows). In 2023 WDNR informed Rob 'n Cin that they were operating an unlicensed (CAFO). This also exceeded the farm's zoning limit of 999 AU, meaning that the farm was violating both its state permit and its local zoning. It's important to remember that Rob 'n Cin farm is owned by a member of the Town of Trenton Planning Commission who was also the Vice President of the Ozaukee and Wahington County Farm Bureau. Mr. Roden was well aware he was out of compliance and cannot credibly claim to be ignorant of his violations.

Rather than imposing fines and forcing the farm to reduce its herd to comply with its permit, the WDNR began working with the farm to come into compliance by revising their Wisconsin Pollution Discharge Elimination System (WDPES) permit that would bring its current operation into compliance with their permit. Following the notification from the state, the farm began the process to amend their WDPES permit to become a CAFO and allow over 1,000 AU as well pressing the Town to create an Agricultural Enterprise zoning classification that would allow the farm to operate with over 1,000 AU.

The application before you would expand his zoning to allow 2,500 AU, which is 2.5 times his current zoning and almost twice it's current operation. This process has been continuous and divisive in the Town.

In the last few months, concerned residents have made the DNR aware of several deficiencies in the application. Some of these concerns have been expressed in previous letters to the Town and WDNR. The list of these concerns will be expanded upon during the contested case hearing. Some of the major concerns can be summarized as follows:

- The local groundwater resources are much more vulnerable to contamination than assumed by the farm in their WPDES permit application and places the safety of the private water supply wells, the health of the residents, the quality of the environment, and future property values at risk.
- New mapping by the Wisconsin Geologic and Natural History Survey (WGNS) has found several more areas of shallow bedrock in the Town of Trenton and surrounding areas that are vulnerable to contamination from manure spreading and could cause significant groundwater contamination issues similar to the problems in northeast Trenton and the Newburg area that seriously sickened a young resident, required a special casing regulation for private water supply wells and led to the contamination of over 1.5 square miles of the Towns of Trenton and Saukville and portions of the Village of Newburg.
- The Rob 'n Cin operation includes two satellite farms in the Town of Saukville that were not named in the original application and are operating with manure ponds that do not meet Nutrient Management Permit standards.
- Manure spills from the Rob 'n Cin farms are impacting local waterways.
- The farm is creating significant quality of life issues for surrounding residents including truck traffic, odor, and noise.

In response to these concerns, the state of Wisconsin has started an administrative law review of the WPDES permit application. I have been an expert for several administrative hearings on CAFOs and other large industrial developments. In my experience, if the judge accepts the administrative challenge, it is because there is significant evidence that the permit was granted on flawed or incomplete information and that significant modifications and restrictions are likely to be added to the permit or the project may be revoked. During the review process, the permit under review is on hold and the previous permits are frozen in their current state. This means Rob 'n Cin will be governed under their existing WPDES permit and are still out of compliance with state and local permits until the review process is complete. This is likely to take well over a year. It is entirely possible that the restrictions and requirements that result from the review will make a CAFO economically nonviable in its present location and the application will be withdrawn by the applicant.

Considering that there are very likely to be significant restrictions on any final WPDES permit, the Town would be premature in granting zoning changes that may be inconsistent with the actual permitted operation of the farm. The initial proceedings for the contested case hearing will happen in the next few months. At that point, it will be more clear what parts of the WPDES permit will be amended and the magnitude of the changes that can be anticipated. The Town should wait until at least that point to estimate the timeline and the magnitude of any changes to the permit that can be expected. At that point, the Town will be in a better position to understand what changes in zoning are consistent with the farms permitted operation and in the best interests of the residents.

While the permit is held up, the Town needs to take some credible actions to preserve their authority to regulate land use for the protection of its citizens. Allowing a well-informed sitting planning commission

member to knowingly scoff zoning laws and state regulation creates an established pattern of favoritism, conflict of interest, and selective enforcement. It will be unlikely that any future zoning actions by the Town will survive legal challenge if they do not treat a sitting Town officer the same as an average citizen. If the Town elects to capitulate to the demands of the Rob 'n Cin farm they will be setting a precedent for future landowners to ignore the law and threaten to sue if they are challenged. The Town is foolishly forfeiting their legal responsibilities out of favoritism or fear of a single person. This is an opportunity for the Town to chart a more fair and defensible path.

Based on the current situation, the Town should:

- Table any actions on zoning changes for the Rob 'n Cin Farm until the results of the administrative hearings are better understood,
- Require the applicant to come into compliance with his existing zoning and honor a period of compliance for at least as long as he was non-compliant to demonstrate he is willing to follow regulations before any future zoning changes are considered,
- Impose financial penalties to provide a disincentive for other parties to ignore regulations and to reimburse the Town for the time and expenses required to deal with the applicants' actions,
- Use the extra time for discussion with residents on their desires for the future of the character of the Town,
- Form a citizen's work group to set goals and guidelines for the development of the Town,
- Review Operational Ordinances developed by other Towns to balance the desires of individual landowners against the property rights and quality of life of the rest of the residents.
- Develop an operational ordinance that allows responsible development of land that provides the maximum benefit to the landowner without compromising the quality of life or property values of the other residents in the town.

It is important to remember that farms of the size that Rob 'n Cin are proposing are new to the area. This is not what people in the Town are used to and not what was here when they chose to build or buy property in the Town. This is not a grandfathered right of the existing farmers who bought their farms with an understanding they would be limited to smaller operations. Large CAFOs may be the future of agriculture, but it does not mean that in the future agriculture CAFOs will be suitable for all areas that currently have smaller farms. Milwaukee and Mequon were once agricultural areas. Agriculture has moved away as their operations began to conflict with changing land use of the areas. The same fate is likely for larger farms in many developing outer-ring suburban areas.

This is a choice that the Board is forced to make: Decide on a future for the Town that is to the greatest benefit for the majority of the residents and more sustainable, rather than cling to some biased idea that expansion of industrial agriculture is a farmer's right, but that preservation of the quality of life people chose when they bought their properties is not at least an equal right. The choice is clear, the Town can decide to preserve the quality of life, environment, and health and safety of their residents, as they are duty bound to do, or give in to the demands of a single land owner and hope that the consequences will not be as bad as the experience of other Towns. This goes beyond individualistic libertarian property rights philosophy; this goes to the heart of protecting the rights of the public over the short-term gains of a well-connected individual.

The Town stands at a crossroads. It can continue to be a pleasant place to live with a comfortable blend of residential and small-scale agriculture, or it can become a much less comfortable and safe place to live all in the service of a few privileged landowners. Please act responsibly by delaying the rezoning application and solicit and listen to the opinions of your residents while you let the Administrative Review process take its course.

I appreciate your service to our community and your attention to this matter. Thank you for your hard work and consideration of this issue.

Yours truly,

A handwritten signature in black ink, appearing to read "John Jansen". The signature is fluid and cursive, with the first name "John" and last name "Jansen" clearly distinguishable.

John Jansen, P.G., Ph.D.

CC: Town of Trenton Board members, Town of Trenton Planning Commission members



October 27, 2023

BY U.S. AND ELECTRONIC MAIL

Town of Trenton Plan Commission
Town of Trenton
P.O. Box 259
Newburg, WI 53060

Re: Resolution Z2023.10.02, Amending the Zoning Map of the Town of Trenton: Rob-n-Cin Farms, EA Exclusive Agricultural to AE Agricultural Enterprise

Town of Trenton Plan Commission:

Midwest Environmental Advocates, Inc., (MEA) sends this letter commending the decision of the Town of Trenton Plan Commission to postpone resolution Z2023.10.02 following significant public participation during the public hearing on October 9, 2023, and offering input on the authority available to the Town.

MEA is a non-profit environmental law center that combines the power of law with the resolve of communities facing environmental injustice to secure and protect the rights of all people to healthy water, land, and air. MEA supports the community members calling for common-sense regulation or limitation of concentrated animal feeding operations (CAFOs) through local zoning ordinances.

We believe some information surrounding the interaction between the Wisconsin Pollutant Discharge Elimination System (WPDES) permitting regime and zoning decisions at the local level has potentially been misrepresented during and prior to the public hearing. We are concerned about the statement in “Get the facts straight on ‘Factory Farms in Trenton’” that the “[t]he town cannot deny a CAFO if the DNR approves it.” Additionally, it does not appear that the distinction between zoning and WPDES permitting was fully clarified at the public hearing based on the unofficial minutes published on the town’s website. We address both points below, but in general, the Town is under no obligation to approve rezoning for any parcel if it can be shown there are sound reasons to deny it.

Zoning and WPDES permitting are separate processes and zoning is largely unimpeded by the WPDES program. The Wisconsin Department of Natural Resources (DNR) administers the WPDES program, which regulates discharges of pollutants to waters of the state. Local zoning of CAFOs falls under different laws, in this case, Wisconsin’s Livestock Facility Siting Law (Siting Law). Importantly, the DNR’s determination on a CAFO WPDES permit application under Wisconsin Administrative Code Chapter NR 243 does not have any bearing on whether the Town can or cannot rezone through the Siting Law. Wisconsin law makes this clear.

The Siting Law codified in Wis. Stat. § 93.90, empowers towns to regulate CAFOs through zoning. The Siting Law explicitly permits towns to create zones where CAFOs may not exist. Wis. Stat. § 93.90(3)(c). The same law allows political subdivisions, like cities, villages, towns, or counties, to deny applications for CAFOs in those restrictive zones. Wis. Stat. §§ 93.90(3)(a)(1)-(2).

Confusion commonly surrounds CAFO WPDES permits and the Siting Law because certain standards or requirements of the Siting Law can be abridged or bypassed by the issuance of a WPDES permit. However, local zones restricting CAFO siting are **not** bypassed by a WPDES permit. A WPDES permit simply bypasses livestock facility siting rules under certain circumstances in three areas of the application: nutrient management, waste storage facilities, and run-off management. Wis. Admin. Code ATP § 51.16(4), 51.18(7), 51.20(10). Local zoning decisions are not bypassed by the issuance of a WPDES permit.

It remains within the Town's control to make informed decisions on zoning determinations for individual parcels. The Town has adhered to the Siting Law's requirements by creating the zoning district Agricultural Enterprise. The creation of the zoning district does not require, nor does the Siting Law require, that the parcels at issue are amended to be Agricultural Enterprise.

Wisconsin's Siting Law envisions areas of local control and expertise. Local zoning determinations are one such area. Further, as you consider additional options, understand that your town is not foreclosed from enforcing a zoning ordinance that places additional restrictions on CAFOs if those restrictions are based upon "reasonable and scientifically defensible findings of fact" that "clearly show that the prohibition is necessary to protect public health or safety." Wis. Stat. § 93.90(3)(c).

Several public health and safety concerns were brought forward by multiple Town of Trenton citizens at the public hearing on October 9, 2023. These concerns included water quality impacts on Cedar Creek, the Milwaukee River, Cedarburg Bog State Natural Area, and groundwater accessed by local wells; impacts on public safety from increased truck traffic; and air quality impacts. Each of these concerns were well informed and likely supported by scientifically defensible findings. MEA encourages the Town to consider these concerns.

Furthermore, MEA encourages you not to base a zoning amendment on unsubstantiated concerns regarding a legal challenge. You should not be dissuaded from protecting the community through adequate and necessary regulation by threats of litigation. These threats are a tool often employed and rarely acted upon because local governments are explicitly empowered to engage in exactly this type of local land use regulation.

Finally, it has been alleged that the rezoning applicant is currently not in compliance with the current zoning ordinance and/or DNR regulations based on his current animal count. If these allegations are factual, it is very concerning that an amendment is being considered given the present potential noncompliance on the parcels at issue. We are currently reviewing documentation to substantiate the allegations.

Noncompliance can be a consideration in future CAFO approval or disapproval decisions beyond just the present zoning amendment issue. Recently in *Town of Ledgeview v. Livestock Facility*

Siting Review Board, the Court of Appeals upheld a town's denial of a livestock facility siting permit based upon past noncompliance and disregard for federal, state, and local laws. 2022 WI App 58, ¶ 5 (Wis. Ct. App. 2022). In reviewing applicable state statutes and regulations, the court concluded that "where clear and convincing information . . . establishes that the application is not credible as to compliance with the Siting Law's state standards, a political subdivision has the authority to deny the application." *Id.* at ¶ 32. Should the rezoning applicant ultimately attempt to seek a permit from the Town, we hope the Town remembers this authority.

MEA encourages you to fully review the potential public health and safety impacts that amending the zoning map for the parcels at issue will have on the community, not be deterred from protecting the community by threats of litigation, and to review the implications potential zoning noncompliance may have on the amendment and any future permit decisions.

Please don't hesitate to contact me with questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Voskuil". The signature is fluid and cursive, with the first name "Adam" and last name "Voskuil" clearly distinguishable.

Adam Voskuil
Staff Attorney
Midwest Environmental Advocates, Inc.

David Johnson
Law Clerk
Midwest Environmental Advocates, Inc.

To: Town of Trenton officials. January 9, 2026

We strongly oppose the rezoning of the Roden Farm from EA to AE, for the following reasons:

Effects on environment:

- ✓ CAFOs create large volumes of animal waste at often excessive rates for the absorption of the surrounding landscape and ecosystems.
- ✓ Manure runoff, waste application, and lagoon spills pollute surface and ground waters with nitrates, pathogens, and other contaminants, threatening soil health, habitat, and drinking water.
- ✓ CAFOs are the largest source of agricultural greenhouse gases, worsening climate change.
- ✓ The built footprint of CAFOs also degrades landscapes.
- ✓ You've only had to step outside in the town of Trenton after the manure has been spread and you will not take a deep breath because your nostrils flare with the stench, you get an instant headache, you feel nauseated, you will not be able to sit outside nor open your windows. This does not smell like manure; it smells like raw sewage.

Effects on health:

- ✓ Studies show that CAFOs can expose workers and nearby communities to toxic air pollutants of ammonia, hydrogen sulfide, and harmful volatile organic compounds.
- ✓ Breathing this toxic air causes harm to respiratory and nervous systems and can lead to disease.
- ✓ Nitrates in drinking water are associated with increased birth defects, thyroid issues, reproductive harm, and blue baby syndrome.
- ✓ CAFO workers also face high rates of workplace injuries.

Economic impact on our town:

- ✓ CAFOs diminish property values.
- ✓ CAFOs push out smaller farms by distorting the market.
- ✓ CAFO proposals can overestimate/underperform in economic output studies.
- ✓ CAFOs often add extra costs to local infrastructure (roads, bridges, water).
- ✓ CAFOs typically outsource materials and labor from outside the host community.
- ✓ CAFOs still collect subsidies, why?

In contrast to free-range farms, where cows roam pastures and chickens search for food in open fields, CAFOs keep their animals confined and deliver feed directly to them, preventing them from moving freely. Picture yourself stuck indoors all day, unable to go outside, simply waiting to be fed. ☹

If we honestly believe that Roden Farms will be compliant, why haven't they done so already? The most crucial question is: why haven't they been held accountable?

From our understanding, currently, the Roden farm is not compliant with current Town of Trenton as well as State of Wisconsin zoning as they are currently at 1400 animal units and with their current zoning, EA they are only allowed to have 750 animal units! In our opinion, this is not farming but a factory for increased profits. We were also trying to understand the need for rezoning as there has not been, nor is there a shortage for milk in WI. And yes, the increase in manure is another major concern. We well know that living near farms you are going to have various smells, but when the stench is raw sewage and you cannot go outside or plan anything outdoors, not only does this impact on our health but also our quality of life here in Trenton. We

have called the Town of Trenton officials on occasions to voice our concerns when the stench is obnoxiously strong and offensive.

Conclusions

CAFOs are a cornerstone of industrial agriculture, offering economic advantages by producing large quantities of affordable food. However, their operations pose environmental and public health risks, including greenhouse gas emissions, water pollution, and air quality concerns. Stakeholders, including corporate agribusinesses, environmentalists, and policymakers, have long debated the implications of CAFOs and the need for stricter regulation. Existing measures like the Clean Water Act and recent legislative proposals demonstrate efforts to address these challenges while balancing economic and environmental priorities. Further regulatory and operational improvements will likely remain central to the evolving discourse on sustainable agriculture.

Attachment to email, Submitted by;

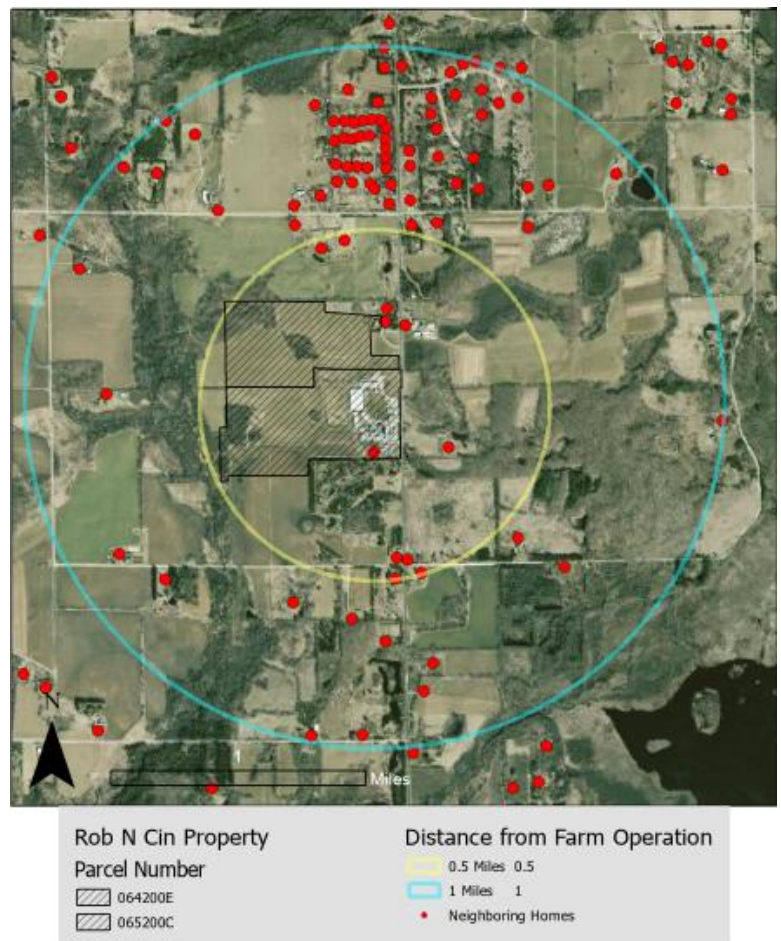
Cindy & Mike Kawiecki
7277 W. Summit Circle
West Bend, WI 53090

Dear Town Planning Commission,

I am asking the Town Plan Commissioners to oppose the rezone of Rob n Cin's EA to AE zoning. We have been voicing for over two years now that a CAFO is not appropriate in this area. According to the AE zoning ordinance "The district's uses and regulations are designed to implement Comprehensive Plan goals by encouraging livestock and other agricultural uses in areas where conditions are best suited to these agricultural pursuits and discouraging residential development to avoid potential land use conflict." The Rob 'n Cin farm location has been built in an area that is not suitable for intensive agricultural pursuits and has already created land use conflict with residential neighbors for the following reasons:

Figure 1: Density of Homes within a mile of property

1. Rob 'n Cin was built less than a mile radius of two neighborhoods (containing collectively 46 homes), with a total of 87 homes within a mile radius of the main farm operation. Many of these homes have been built before the 1990's, some before Roden's purchase of their farm in 1995 when his family operated as a 70 dairy cow operation. These homes who have been around for just as long, or longer than the Roden farm, or have built before he became an unpermitted CAFO in 2022, are now impacted by the intensity of the industrial farm. This put many residents of Trenton and Saukville in close proximity of industrial farming where they were originally small farming operations, of dry manure or local manure spread instead of semi trucks. It is unfair for the planning commission to assume that people moved to this area next to an already existing large industrial farm operation, and to give priority to a business who grew within the



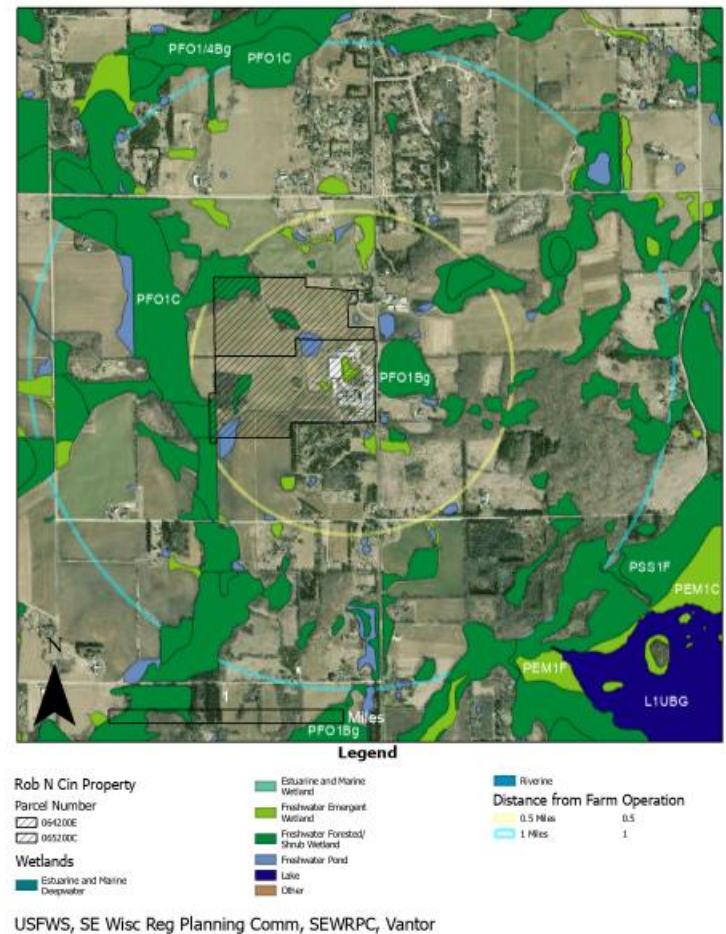
last four years illegally, instead of the people who have been living here, some for decades and cannot relocate due to the economy. Other permitted CAFOs are located in significantly less populated areas for reasons that it does not mix well with residents who want a safe, clean environment to live. This is different than small farms and their operations and the culture of our traditional farming community who put cows on the pastures and have slower tractor operations.

Figure 2: Wetlands Surrounding property

2. This property is surrounded by wetlands, not farmland. These wetlands, including those near the Cedarburg bog, are vulnerable and significant ecosystems with shallow bedrock. When you visit the Roden farm, it is not unbroken fields of corn and farm fields, it is forest and wetlands. It should be noted that no government has conducted an environmental impact assessment as requested by residents.

3. There is an insufficient farmland mass to hold the carrying capacity of industrial farming at the scale the Roden farm is trying to operate. 140 acres is not enough land to ensure his operation needs are met in a way that is not impactful to

human health and safety, since Roden needs over 2,000 acres for spreading his manure. This has forced Roden to secure land, not through ownership as other WPDES permitted CAFOs are, but through rented land (1497 acres) and oral land agreements (826.3 acres, with no oversight of if there is an actual written agreement by the DNR). Even the DNR had to remove manure areas from his manure management plan, because of word of mouth and outside organization involvement found he did not have permission to spread. This puts strain on the neighboring communities outside of the town of Trenton, since Rob n Cin's manure management



plan expands over 15 miles of area, spreading as far as Port Washington and it is often on the residents to report noncompliance as the DNR staff are understaffed and do not monitor farm activities beyond self-monitoring. An AE zoned area would be more suitable in areas where farmland is undisturbed for thousands of acres seen in other locations of Wisconsin and where the CAFO is the one who owns at least half of their manure management plan needs adjacent to their farm operation.

An AE rezone is not appropriate in this area for the above reasons, and it would be irresponsible to allow an operation a rezone simply because they decided to grow without first receiving the proper zoning or permits. It is not the town's responsibility to clean up a business' mess, it is their responsibility to govern the people for the benefit of the community.

The town has been showing an inability to protect their residents from major concerns. These concerns include fire emergency plans, limits of operation times for noise (trucks and loud farm operations such as manure spreading), air pollution limits groundwater contamination liability and property value decreases. There have been numerous residents who live within a mile of the farm, who receive the most brunt of the operation, voicing concerns about manure trucking operations, extreme odor to the point of health difficulties, and loud operational noises heard a mile away in the middle of the night. These are realities that residents are experiencing now and will experience an increase in negative and worse outcomes as the operation grows. We would like the planning commission to remember that allowing the growth of CAFO would increase his manure from 9,470,254 gallons (1,578 truck loads) to 16,851,866 gallons (2,808 truck loads) when he increases his herd to 2,500 AU. These concerns are not controlled in the AE zoning or in a conditional use permit and has been largely ignored by the planning commission who find a lot of ability putting limitations on family residents or smaller operations who have little impact on a larger scale, but seek little involvement in a large industrial farm that is changing our community. These complaints are not going to go away by permitting AE zoning, they will only increase frustration among residents who become increasingly more impacted by intensive farm operations and have nowhere to go and a government that show little interest in protecting residents.

The only limitation mentioned in the conditional use permit is regarding the Wisconsin Pollutant Discharge Elimination System permit, which only monitors discharging wastewater pollution, and has no protection toward groundwater monitoring (as contamination can and has occurred even in line with manure management plans as seen in many permitted CAFOs in Wisconsin cases). This permitting process does not give the DNR the ability to prevent nor give authority on where industrial farming operations,

including where CAFOs can occur, even if it is in the worse possible location. If a farmer wanted to raise thousands of chickens or cows in the middle urban Milwaukee, the DNR would have to permit it if they complete a pollution discharge plan. It is power given to our local government and ordinances to determine where there are appropriate operations for industrial farming, and they should do so with considerations on how allowing an industrial farming impacts neighboring residents in Cedarburg, Saukville, West Bend, and Grafton. It should also be noted that Rob 'n Cin LLC is the closest CAFO to Milwaukee, hence why it is receiving criticism to its location closer to residential homes who rely on shallow groundwater wells, and surrounded by the Cedar Creek branch and the Cedarburg bog gaining opposition from Milwaukee Riverkeepers and the Midwest Environmental Advocates.

According to the town ordinance, "The standards for issuing a permit are as follows: i. The state livestock facility siting standards adopted under Ch. ATCP 51, Wis. Adm. Code. These standards are incorporated by reference, without reproducing them in full." Because Rob n Cin WPDES permit is now contested, they do not meet this standard for receiving a conditional use permit above the 999 AU. This contested case is considered a serious concern since the DNR does not have to accept contested cases, and only does so when there is a flaw within the permit. It is therefore unfair to give Roden a Conditional Use Permit since he does not meet the standards of the CUP. It is in the town's best interest to at minimum wait to provide and rezoning or CUP until they have a full understanding of the contested case. It will also be to the town's embarrassment if Rob n Cin loses a permit after being rezoned with a CUP.

And finally, as a lesser point, it is still a topic to take a look at what an AE zone does to change our town's image. We are a lovely town filled with small farms, a town that has thrown caution for many forms of smaller operations and holding strict codes to residents to help preserve the image of the area. It is obscene to allow an industrial farming operation that keeps building more buildings, manure tanks and creating a large mess among family homes, modest farms and beautiful forests. Our values do not align with that of a rezoned, that will only welcome more growth from an expanding factory farm. It is no different than putting limitations on developers trying to create more houses, which the town has taken an interest to. I have personally watched this farm grow from a modest beautiful dairy farm that let their cows on the pasture, to a reckless massive operation despite ordinances preventing such growth to be able to hold a traditional farming image. It becomes the question; how do you want our town to look? Because at this rate, the Roden family will always be looking for more from the town, they have stated before and we have seen a request for the town to allow up to 5,000 AU. There are plenty of small farmers, who are met with much greater restrictions while having little impact on their neighbors, while the

Roden's are given a free pass for being out of compliance. It is not in the public interest, it is at the public's cost, and only Roden's business benefits.

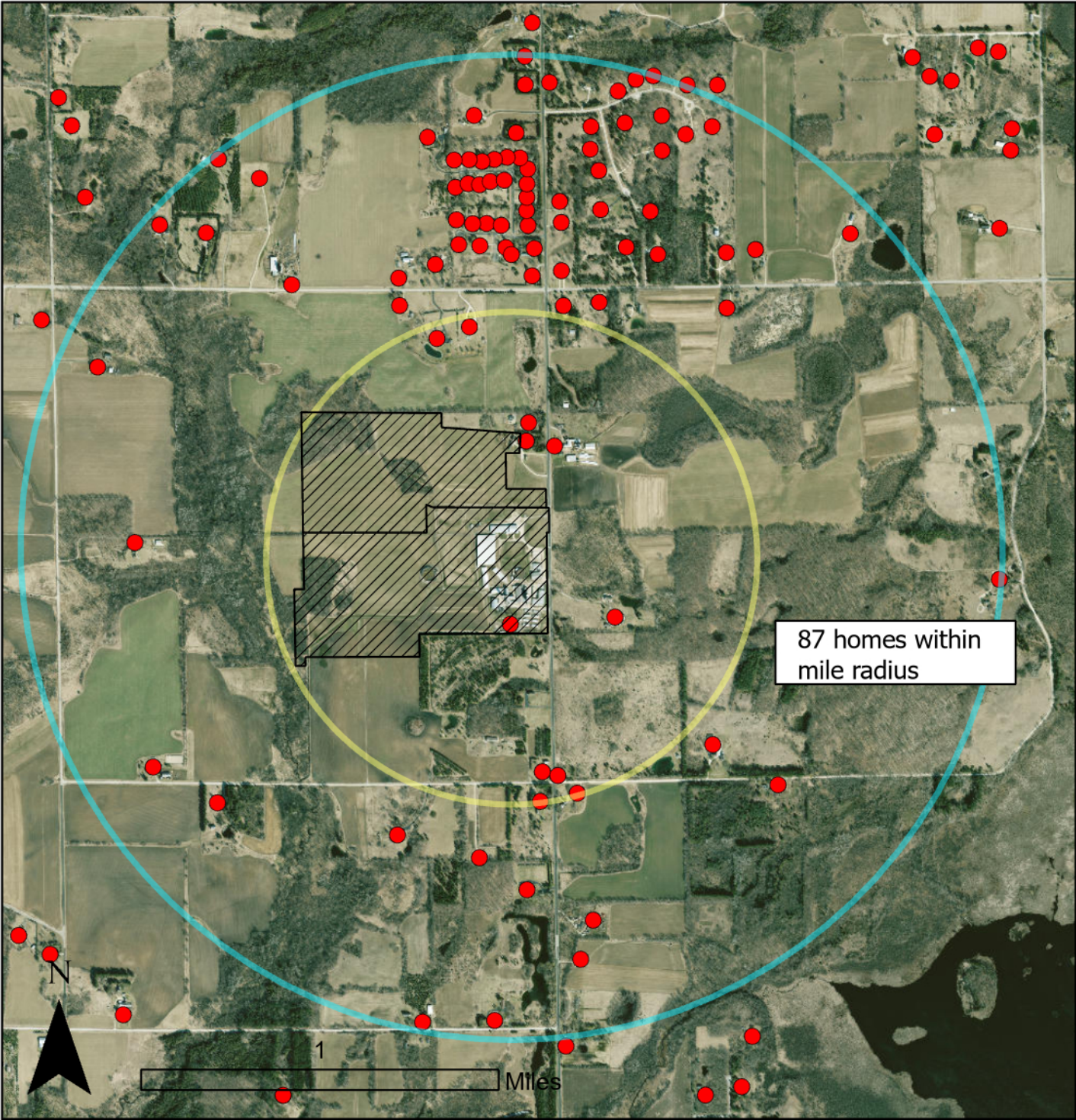
I appreciate your time and effort, and hope you take these points in your decision on January 12, 2026. As a resident, I hope you stand up for the people who live here, and oppose the rezone and put Roden into compliance as we have been asking for two years.

Kind regards,

Lauren Kearns

5859 County Rd Y West Bend WI

Rob 'n Cin Neighboring Homes Impact



Rob N Cin Property

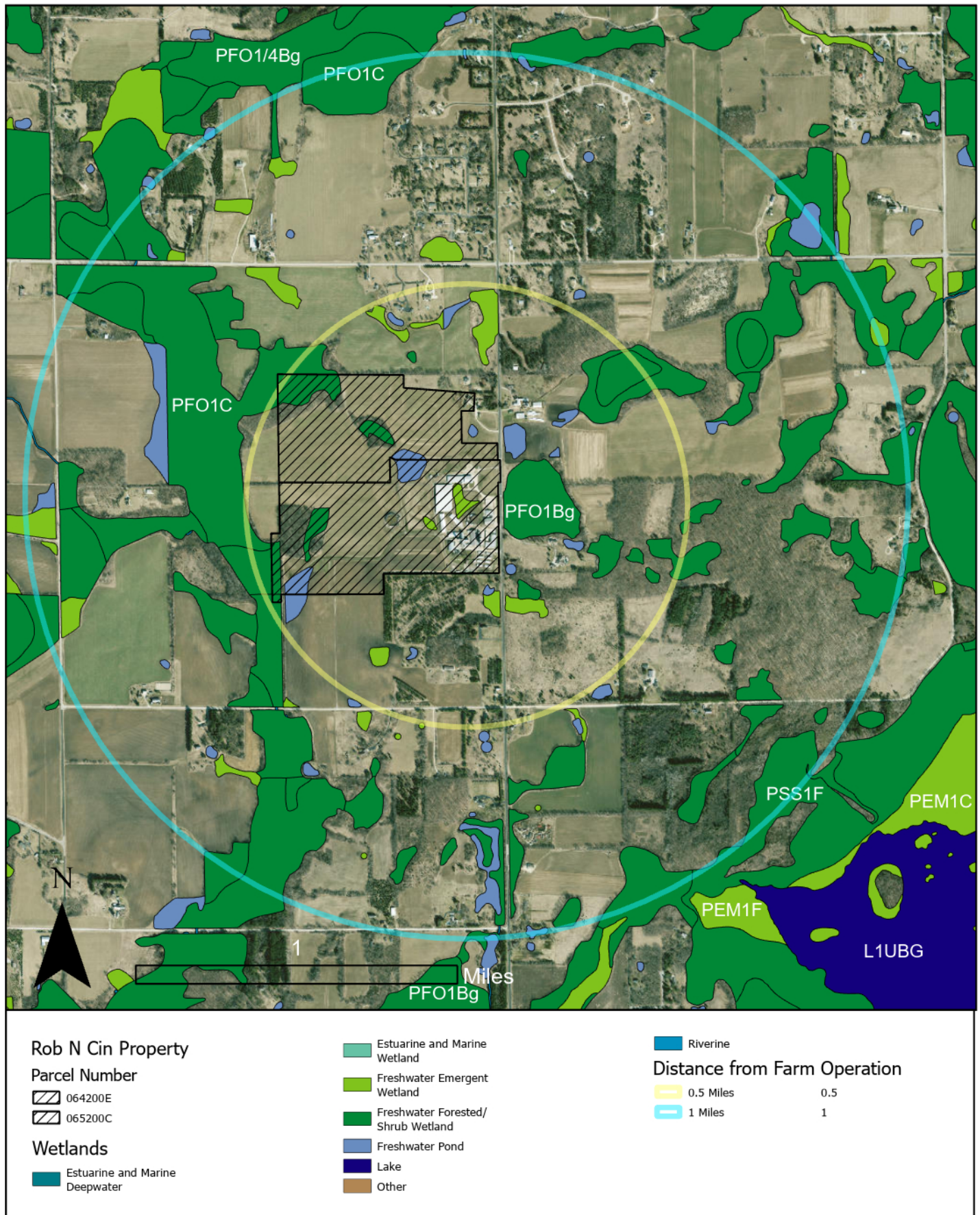
Parcel Number

-  064200E
-  065200C

Distance from Farm Operation

-  0.5 Miles
-  1 Miles
-  Neighboring Homes

Rob 'n Cin Wetland Areas



From: **Jason Koenitzer** <jaykoenitzer@gmail.com>

Date: Tue, Jan 6, 2026 at 8:47 AM

Subject: Rezoning of Roden Farm

To: Chairman <chairman@townoftrenton.wi.gov>

Hi Mike,

I hope that you had a nice holiday. I wanted you to know that I oppose the rezoning of the Roden farm to allow for any expansion. We have lived in the Town of Trenton for over 20 years now and have seen first hand the negative impact this expanding farm operation is having on our community. It has become much more apparent in the last couple of years. Increased large truck traffic, foul odors, environmental impact, and lower property values are all part of the concern. In addition, we are all on private wells and the risk to our drinking water is too great.

We have invested almost \$250,000 in property taxes since we purchased our Trenton property in 2000. I find it disheartening that one resident can have such a negative impact on a whole community. We rode our bikes on a beautiful November afternoon last year on what used to be quiet, peaceful, and inviting roads. On our ride on Knollwood between Wausaukee and Hwy Y 4 large manure trucks went rushing past us and then on Hawthorne Drive the same day additional manure trucks went flying by. My point is that the atmosphere in our neighborhood has changed and it is affecting a large area of our community.

Please make the right decisions to limit the growth of this operation. You are in your position to represent the **people** of this community and not just special interests.

Sincerely,

Jay Koenitzer,

6262 Congress Drive

TOWN OF TRENTON PUBLIC HEARING APPEARANCE SLIP

DATE:	11/12/2026	TIME:	6:15 PM
ITEM:	Road rezoning		
SPEAKING is Limited to Town of Trenton Residents only Time limit for speaking will be announced at the beginning of the public hearing public hearing			

Complete and deliver it to the Plan Commission Chair

NAME	Cheryl Nenn
ADDRESS	2400 N. 58th St Milwaukee WI 53210
PHONE	414.378.3043
TOWN OF TRENTON RESIDENT?	☐ YES ☒ NO
REPRESENTING	Milwaukee Overkeeper
☐ I wish to speak in favor of the petition ☒ I wish to speak in opposition of the petition ☐ I wish to speak for informational purposes only	
COMMENTS:	
Your CUP entirely relies on the State Waterway or WPPES permit conditions. That permit is being contested and so the permit will be stayed until after court proceedings. The permit will also likely change. The town should consider conditions not covered by DNR such as traffic, wear and tear on roads, odors, etc	
The rezoning application mostly referred to DNR application materials vaguely and did not include components	

required by state law (adjacent
landowners, CSM maps, etc).

- Public hearing not correctly noticed
per class II hearing requirements.

- If all CUP provisions pertain to
DNRE permit, how will town enforce
any of these conditions?

- Need clear conditions noted that
are enforceable in CUP permits -
not appropriate to copy and paste
DNRE permit. That permit also likely to ^{change}.

- Also note that DNRE permit allows
for up to 2925 animal units, not
2500, which is on your CUP and
zoning application.

- Town should consider impacts not only
of farmstead but for where
19,000,000 gallons of manure will be
applied and whether there should be
conditions to protect wells and
waterways, and private landowners.

Alan Oppermann<aloppermann57@gmail.com>

TownAdmin

> On Jan 7, 2026, at 1:18 PM, Alan Oppermann <aloppermann57@gmail.com> wrote:

>

> To whom it may concern:

> We oppose the rezoning of the Roden farm because of the impact of such a large concentration of hazards.

> These include disease, waste and chemicals that would present dangers to health safety and well being of surrounding residents.

>

> The impact of a breakdown in the process of any of these hazards wouldn't be confined to the Roden farm since there are no assurances it would not affect the town of Trenton and the surrounding communities.

Cynthia Longville<clongville3@icloud.com>

TownAdmin

Not in favor of CAFO for this farm. Please do not approve

Sent from my iPhone

To: The Town of Trenton Board and Planning Commission

We are writing to you not only as residents of Orchard Hills Subdivision and neighboring residents but as families who have deeply invested in the future of our community. Many of us chose this area specifically for its rural charm, clean air, and peaceful environment. We made the conscious decision to build our homes and raise our families here, fully expecting that local zoning ordinances would protect the character of our neighborhood and limit farms to 999 animal units.

However, the recent developments of the Roden Farm (Rob-n- Cin Farm), located just one mile from our homes, have caused significant concern. Despite our earlier petition and the town's assurances that major expansions would not be permitted, a proposal put forward on February 10, 2025, seeks to expand the agricultural zones allowing farms to 4,999 animal units on just 120 acres. This represents a dramatic shift from both the original zoning restrictions and the current animal units allowed in our Town zoning. Such an expansion of area farms would fundamentally alter the nature of our community and disrupt the lives of every family here.

Our opposition is not rooted in opposition to farming, but in the real impacts we are already experiencing with a current operation in our Town. Transforming a traditional farm into an industrial-scale operation of this magnitude would have far-reaching consequences for every aspect of our daily lives.

Our Key Concerns:

1. Property Value Impact

The Wisconsin Department of Revenue has recognized that proximity to CAFOs can significantly decrease property values. In a 2017 case, the Department reduced property assessments by 13% for homes located near CAFOs, explicitly acknowledging the negative financial impacts these operations can have. This precedent suggests that our community is at risk of a significant drop in property values if the proposed expansion moves forward.

2. Water Quality and Well Safety

The proposed expansion would nearly double the farm's manure production—from 11 million to approximately 21 million gallons annually with 2500 Animal Units. Several residents have already noticed elevated nitrate levels in their wells during off-season testing, raising concerns about groundwater contamination. According to the CDC and the EPA, nitrate contamination can cause severe health risks, especially for infants, pregnant women, and long-term exposure could lead to cancer and other serious conditions.

The Wisconsin Groundwater Coordinating Council has reported that areas near large livestock operations often exceed the health standard of 10 mg/L for nitrates. The financial burden of addressing this contamination falls on homeowners. For example:

- Installation of reverse osmosis systems: \$1,000-\$2,500 per household
- Annual maintenance: \$100-\$200
- Filter replacements: \$150-\$300 every 6-12 months
- Whole-house nitrate removal systems: \$7,000-\$10,000
- Water testing: ~\$650 per test
- Well replacement: \$10,000-\$20,000

3. Environmental Health Risks

Research published in *Environmental Health Perspectives* shows that residents living near CAFOs face increased risks of respiratory conditions, headaches, and other health issues from elevated ammonia and particulate matter levels. A study in North Carolina found that children living near CAFOs were especially vulnerable to these health risks (Wing & Wolf, 2000).

4. Infrastructure and Quality of Life

The proposed expansion would not only affect the immediate environment but would also place undue strain on our community's infrastructure. To accommodate the additional manure produced, the farm would need to acquire more land for spreading, but no adjacent land is available. Consequently, the farm would need to increase truck traffic to transport manure to distant fields. This increase in heavy truck traffic will further deteriorate local roads. Each manure truck causes road damage equivalent to 850 passenger vehicles, accelerating wear and increasing repair costs for local taxpayers.

Additionally, the increase in truck traffic would significantly impact residents' quality of life, causing noise, dust, and congestion, further worsening the already overwhelming smell and air quality issues. We urge the Town of Trenton to consider the full range of consequences, from infrastructure deterioration to reduced quality of life, when evaluating this proposal.

5. Vulnerability to Outside Corporate Development

The proposed zoning change sets a troubling precedent that could pave the way for large-scale corporate CAFO development. This would open our community to outside interests, whose operations often prioritize profits over local concerns. For example, in Burnett County, Wisconsin, a corporate entity attempted to establish a 26,000-hog operation in 2019, exploiting permissive zoning laws to target the area. In Iowa, the proliferation of corporate-owned CAFOs has led to the displacement of family farms, with out-of-state entities controlling over 800 operations by 2018. The proposed zoning change could attract similar corporate CAFOs, eroding local control and leading to further industrialization.

Our Position:

While we respect traditional farming, the proposed expansion to 4,999 animal units would permanently and drastically alter the character of our rural community. The current 1,400-unit operation is already pushing our infrastructure to its limits and diminishing our quality of life. We are forced to endure noxious odors that pollute our air, constant noise from barn fans running around the clock, and a relentless stream of trucks rumbling past our homes late into the night. On top of that, we must bear the financial burden of testing our wells to ensure our water remains safe. Expanding this operation any further is simply unsustainable and unacceptable. Moreover, the existing farm is already operating illegally, far exceeding its zoning limit of 999 animal units. Allowing this expansion would not only legitimize an ongoing violation but also set a dangerous precedent for disregarding regulations meant to protect our community.

We respectfully request the following actions from the Town Planning Commission and Town Board

1. Maintain the current animal unit at 999.
2. Implement mandatory setbacks from residential areas when spreading manure.
3. Require comprehensive environmental impact studies for any future expansion proposals.
4. Establish clear protocols for well testing and contamination remediation, with responsibility falling on the operator.
5. Create and implement Operational Ordinances for industrial farming.

Shifting the Burden of Proof:

It is fundamentally unjust that the burden of proof falls on the community to demonstrate harm from the proposed expansion. The onus should be on the farm operator to prove that the expansion will bring measurable benefits to the township that outweigh the known risks and costs to residents. This should include:

- An economic impact analysis demonstrating net positive effects on local employment and tax base.
- Environmental impact studies showing no degradation to water and air quality.
- An infrastructure impact assessment with proposed solutions for increased road wear
- A community health impact evaluation
- Guarantees to protect property values.
- A written plan for addressing well contamination, including financial responsibility.
- Binding commitments to maintain specific environmental and operational standards.
- A study as to impact on emergency services

In addition

The DNR will probably permit the Roden farm to operate under CAFO rules and regulations. The Town does not have to create a zoning to allow them to be a CAFO under current Town zoning. If they are not allowed to be over 999 the State DNR will still regulate the farm, but the Town can only allow them to have 999 animal units. Also, the DNR requires the farm to self-report, they will investigate problems possibly if reported but it's up to the farm to follow their nutrient plan and to spread manure following that plan. The State does not regulate air quality, road damage, or other issues that causes problems in a community with having a CAFO to manage. It is up to the Town to regulate large farms.

The expansion of a CAFO is a privilege, not a right. It must be earned by proving clear and substantial benefits to the broader community, not imposed at the expense of residents. Trenton is too developed to have a farm the size of a CAFO in our community. It's just the wrong location!

The decisions made today will affect the future of our community for generations. We urge you to prioritize the health, safety, and property rights of the families who have invested in this community over the expansion interests of a single operation.

Respectfully submitted,

Name:

Address:

Name:

Address:

PROTEST PETITION

TOWN OF TRENTON, WASHINGTON COUNTY WI

We the undersigned are adult residents of the Town of Trenton, Washington County, Wisconsin. We object to the rezoning of parcels, T11-063900Z, T11-064200D, T11-064200Y and T11-065200B owned by Rob N Cin Farms, who have petitioned the Town of Trenton to change the classification for these parcels, which total approximately 141.34 acres, from Exclusive Agricultural (EA) zoning to Agricultural Enterprise (AE) zoning.

Our objection is based on the following factors:

1. The rezone does not meet the requirements under Town Ordinance § 380-120. The rezone is not for public necessity or the general welfare of the Town, but for the convenience of Ron N Cin Farms. The rezone petition indicates that the petitioner seeks to enlarge his current herd of milking cows. This is purely a benefit to the owner and not in the public interest.
2. The rezone constitutes spot zoning. Where a rezone is not in the public interest and is solely for the benefit of the property owner, it qualifies as spot zoning.

Cushman v. Racine, 39 Wis. 2d 303, 309, 159 N.W.2d 67, 70-71(1968).

3. The rezone would remove the four parcels from the EA zoning district and would be an unreasonable burden on public facilities. The Town will be forced to spend money on road repairs caused by the increased use, and this will result in less money for public facilities. The increased animal units will have an unreasonable effect on air and water pollution as several of the parcels have wetland areas and they are adjacent to wetlands, primary environmental corridors, and state natural areas.

By my signature below, I acknowledge that I am an adult resident of the Town of Trenton, Washington County Wisconsin and that I have signed this petition with full knowledge of its contents.

Attorney Christa O. Westerberg
cwesterberg@pinesbach.comAttorney Samantha R. Foran
sforan@pinesbach.com

January 12, 2026

VIA E-MAIL

Town of Trenton Plan Commission & Town Board
c/o Mike Lipscomb, Chair
P.O. Box 259
Newburg, WI 53060
chairman@townoftrenton.wi.gov, and

Cindy Komro, Administrator
Town of Trenton
townadmin@townoftrenton.wi.gov

Re: Rob-n-Cin Farms Petition for Rezone and Conditional Use Permit

Dear Chair Lipscomb and Members of the Town Board and Plan Commission:

This firm represents John Yarmark, a concerned citizen in the Town of Trenton ("Town"). We write to address the Petition for Amendment to Town Zoning Map and Accompanying Conditional Use Permit ("CUP") Application, which we understand will be discussed at the January 12, 2026 Plan Commission meeting and at the Public Hearing on the same date. We ask the Plan Commission to reject both the rezoning and the CUP.

1. The Public Hearing Procedures and Notice are Inadequate.

We first note issues with the public hearing notice that the Plan Commission has issued for the rezoning and CUP application together. The public hearing does not appear to have been preceded by a Class 2 notice, as is required by Wis. Stat. § 62.23(7)(de)3. for

the CUP.¹ Additionally, the Town's ordinances require the Plan Commission to hold a public hearing on a CUP, while the Town Board must hold the public hearing on the rezoning, both preceded by a Class 2 notice. Town Ord. §§ 380-40, 380-122(C).² If the meeting on January 12 is intended to be the extent of the public hearings required for either the CUP or the rezoning, it is not legally sufficient under the ordinances, Wis. Stat. § 62.23(7)(de)3., or Wis. Stat. § 62.23(7)(d)1.b.

In addition to this problem, the hearing notice states that the public "may review copies of the application" on the town's website, at the Town Hall, or by requesting a copy of the application from Town Administrator Cindy Komro. However, the documents on the Town's website do not contain the CUP or rezoning application; the meeting packet link only goes to a Wisconsin Pollution Discharge Elimination System ("WPDES") permit recently issued to Rob-n-Cin farms by the Wisconsin Department of Natural Resources ("DNR") with some additional documents attached, and a draft CUP permit. There is no application for the zoning amendment or a CUP application. Until January 7, when we notified the Town Administrator, the link to application materials in the public notice took users to a link requiring a login. *See Attachment A* (correspondence between Pines Bach and Ms. Komro).

As the Wisconsin Supreme Court has said,

Notices and hearings ensure that citizens have an opportunity to express their views regarding zoning amendments. When a zoning amendment is enacted without the required notice and hearing, the public has been denied its statutory right to appear and voice objections to the proposed amendment, and the amendment is therefore void. Furthermore, a hearing serves to inform the members of a municipal legislative body regarding the views of the affected community members.

Oliveira v. City of Milwaukee, 2001 WI 27, ¶ 30, 242 Wis. 2d 1, 624 N.W.2d 117. The court has made similar comments regarding notices for CUP decisions. *See Weber v. Town of Saukville*, 209 Wis. 2d 214, 238, 562 N.W.2d 412 (1997).

¹ We could not locate a notice on <https://www.wisconsinpublicnotice.org/>, which would contain copies of any Class 2 notice. Additionally, the agenda for the Plan Commission meeting says that "Notice was sent on 01/07/2026 to the Washington County Daily News and WIBD Radio" – but the Daily News' website says legal notices are on West Bend Daily News and WIBD Radio may no longer be an actual radio station, as all internet searches for this station go to different stations.

² We recognize the Plan Commission has the option to hold a hearing on the rezoning "on its own volition." Ord. § 380-122(B)(1).

The public hearing notice here is and was incorrect and inaccessible and warrants re-noticing the hearing before the Plan Commission or Town Board takes any action.

2. The Application for the Rezoning and CUP are Deficient.

The Application for Rezoning and CUP that were provided are not complete. The rezoning lacks the information required in Ord. § 380-122(A), including a plot plan, the location and classification of adjacent uses, and a list of all property owners within 200 feet of the area to be rezoned. The Town cannot proceed on a rezoning application that does not comply with the Town's ordinances. See *Edward Kraemer & Sons, Inc. v. Sauk Cnty. Bd. of Adjustment*, 183 Wis. 2d 1, 8, 515 N.W.2d 256, 259 (1994).

As for the CUP application, very little of the information required in Ord. § 380-39 is included in the documents made available to the Town. To the extent the WPDES permit and documents attached to it are intended to stand in for a complete CUP application, Ord. § 380-14.C(13)(b), this is only permissible for land already zoned EA. The land here does not meet this criteria. It is also unclear if the Town has reviewed the application for completeness and followed the procedures in Ord. § 380-14.C(13)(d).³

Further, while the WPDES permit and documents attached to it may contain some of what is required for this CUP application, it is not clear that the applicant has provided all of what is required. For example, Wis. Admin. Code § ATCP 51 and Wis. Admin. Code ch. ATCP § 51 Appendix A – incorporated into Town ordinances per Ord. § 380-14C(13)(b) -- require that applicant attach an area map of the livestock facility and surrounding area, including the “area lying within 2 miles of any of the live structures” and topographic lines.⁴ While there are maps in the documents attached to the WPDES permit, the maps do not show the surrounding area within two miles or topographic lines. This has implications for other requirements under Wis. Admin. Code § ATCP 51, as the distance to the “nearest affected neighbor” determines whether the odor standard applies. Wis. Admin. Code § ATCP 51.14(2). There is no clear evidence in the documents available for review that this standard has been met.

³ Some documents relevant to the WPDES permit application are available at <https://permits.dnr.wi.gov/water/SitePages/Permit%20Search.aspx#k=rob-n-cin#l=1033> We note that Rob-n-Cin has filed many documents on this site in recent days and it is unclear what the Town believes is part of the application.

⁴ Wis. Admin. Code ch. ATCP 51 Appendix A, https://docs.legis.wisconsin.gov/code/admin_code/atcp/020/51_a.pdf

Moreover, the WPDES Permit, while approved, is currently facing a legal challenge, and that process has just begun.⁵ The DNR has granted a request for a contested case hearing and there will be significant litigation prior to any resolution, which could lead to the permit being reversed or amended. Wis. Stat. § 283.63(1)(b); *see* Attachment A (Letter from DNR re: Contested Case Hearing). **While the challenge to the WPDES permit is pending, the challenged permit provisions are stayed by operation of law.** Wis. Stat. § 283.63(1)(am). This means that Rob-n-Cin does not currently have a complete WPDES permit in effect. In the meantime, neither Rob-n-Cin nor the Town can rely on the WPDES permit to escape more thorough local review, under Wis. Admin. Code § ATPC 51.18(7) or otherwise.

3. The Rezoning and CUP cannot meet applicable standards.

Even if the above hurdles could be overcome, the Plan Commission should reject the rezoning and CUP applications.

First, Rob-n-Cin seeks to zone land from EA to AE. The Town cannot approve such rezoning unless “[t]he land proposed for rezoning is suitable for development, and development will not result in undue water and air pollution, cause unreasonable soil erosion or have an unreasonable adverse effect on rare or irreplaceable natural resources.” Ord. § 380-122.B(2)(c). There is serious doubt as to whether Rob-n-Cin can meet these criteria, especially as to whether the development will not result in undue water and air pollution. Rob-n-Cin has been exceeding zoning and DNR thresholds for years, and has been the subject of many citizen complaints related to negative air and water impacts, as the Town well knows.

Second, as for the CUP, assuming the land is rezoned to AE, Rob-n-Cin must demonstrate that its application, including all DATCP worksheets, is “credible and internally consistent.” Wis. Admin. Code § ATPC 51.30(1); Town Ord. § 380-14.C(13)(f). It can be denied otherwise, i.e. where the information about compliance with the DATCP standards is not credible or internally consistent. The Town can and should take Rob-n-Cin’s poor compliance history into account when making these credibility determinations. *Town of Ledgeview v. Livestock Facility Siting Rev. Bd.*, 2022 WI App 58, ¶¶ 36-37, 405 Wis. 2d 269, 983 N.W.2d 685 (affirming denial of CUP where large dairy had poor compliance with runoff standards).

In previous letters we have sent to the Town, we have raised concerns about the Rob-n-Cin farms, including its past violations of ordinances and regulations. For example, in 2024, Rob-n-Cin farms had 1,470 animal units – well over the Town’s legal limit per zoning ordinances at that time. Since then, Rob-n-Cin Farms has continued to increase

⁵ <https://www.wpr.org/news/cafo-permit-wisconsin-dairy-legal-challenge>

the number of animal units. Most recently, in March 2025, DNR noted that Rob-n-Cin Farms had 1,895 animal units⁶ on its property – 1,396 animal units beyond the 499 that is permitted by ordinance as it is currently zoned in without a conditional use permit. *See* Town Ordinance § 380-13. The threshold for obtaining a DNR permit was 1,000 animal units – another violation.

Questions as to Rob-n-Cin's actual planned size persist, such that the application materials are not credible or internally consistent. *See* Wis. Admin. Code § ATPC 51.30(1). While the conditional use permit on the Agenda for the January 12 Plan Commission meeting states that Rob-n-Cin would have up to 2,500 animal units, documentation submitted elsewhere show it plans a higher number. According to the WPDES permit application documents filed with the DNR (to which the hearing notice directs the public), Rob-n-Cin intends to almost double the number of animal units on its property – up to 2,925 animal units by 2030. *See Attachment C* (Herd Size Calculations). This 2,925 animal unit figure is also included in Rob-n-Cin's nutrient management plan filed with the DNR⁷:

Year (crop year)	Milking & Dry	Total Herd Size				Total Animal Units
		Heifers -1000#	Heifers -600#	Calves up to 400#	Steers ~750#	
2025 (current)	930	330	250	150	50	1,895
2026	930	330	250	150	50	1,895
2027	1,200	330	250	150	50	2,273
2028	1,200	330	250	150	50	2,273
2029	1,300	341	250	150	50	2,425
2030	1,600	410	250	160	50	2,925

The Town cannot approve the CUP with this internal inconsistency in the application materials, or invite Rob-n-Cin to again ask for forgiveness rather than permission.

This large difference in animal units has other, more tangible impacts. It would result in an increase from 12,977,788 gallons of annual waste to 19,064,931 gallons, causing a permanent impact on the Town and its residents. As noted above, neighboring properties and community members have already raised concerns about the current

⁶ *See* Notice of Final Determination to Issue a Wisconsin Pollutant Discharge Elimination System Permit for Rob-n-Cin Farms, Oct. 1, 2025, <https://midwestadvocates.org/wp-content/uploads/Rob-n-Cin-Farms-Notice-of-Final-Determination-2025-10-1.pdf>.

⁷ *See* <https://permits.dnr.wi.gov/water/SitePages/StreamAttachment.aspx?ListID=f77d5859-b809-47b4-9ba9-908149168389&stream=true&ItemID=464b6b2b-816f-4dbe-80e9-7e338d1029d3>

levels of animal units and the impact of the manure and waste runoff on surface and groundwater. By approving the rezoning and CUP, the Town would exacerbate these harms the environment and to the community.

4. The “Draft Permit” conditions are vague and insufficient

Finally, we note that the documents on the Town’s website contain a draft CUP permit with a number of conditions. It is unclear who drafted the conditions.

The conditions are insufficient. Some appear to be boilerplate, but they make little sense here, like the condition that “construction and operation shall be in strict conformity to the approved site, building and operation plans filed in connection with the petition for this Permit and such plans are incorporated by reference.” Draft Permit, Condition 3. Which plans? There are none included with the application documents on the Town’s website. If this condition is intended to referenced documents Rob-n-Cin has filed with the DNR, which of the dozens of documents does this reference?⁸ Does it include documents DNR has rejected? There is no apparent or unified set of “approved site, building, and operation plans” to which this condition refers, making it confusing, toothless, and unenforceable.

Condition 6.d. lists “general conditions” included with the WPDES permit that “shall be part of the CUP,” but the following list of items (like “Permit actions,” “Transfers,” and “Other information”) is so non-descriptive as to be unintelligible and useless as a CUP condition.

Condition 6.e. states that certain requirements in the WPDES permit “shall be part of this Conditional Use Permit,” but as noted above, the WPDES permit is subject to change or even reversal in the current legal challenge. Why would the Town make a CUP contingent on a DNR permit that is itself uncertain? It would be more prudent for the Town to deny the rezoning and CUP until the legal challenge to the WPDES permit is resolved and its provisions known.

Certain aspects of that challenge are relevant to concerns expressed by Town residents, especially as to groundwater. For example, the legal challenge will assess whether Rob-n-Cin’s WPDES permit application sufficiently demonstrated that it will comply with groundwater quality standards, and whether the permit as issued will ensure compliance with those standards despite lacking groundwater quality monitoring requirements. *See Attachment B*. Wouldn’t the Town want to know answers to these questions before granting the CUP, which will be recorded and run with the land? Granting the CUP without these answers is premature.

⁸ See note 3, *supra*.

If the legal challenge to the DNR permit does not succeed and the WPDES permit does not change, that is relevant to the Town as well. If no groundwater monitoring conditions are added to the DNR permit, for example, the Town should implement groundwater quality monitoring as part of its authority to monitor compliance under Wis. Admin. Code § ATP 51.34(4)(a). It should also consider conditions requiring well remediation for wells that become contaminated or go dry as a result of Rob-n-Cin's operations. Again, approving the CUP now, prior to resolution of the DNR permit challenge, is premature.

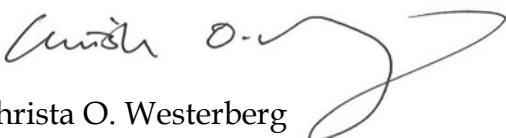
Lastly, Condition 6.g. states that "Livestock facility shall not exceed 2,500 animal units," but how can the Town confirm that the animal units are currently at the amount stated in the application? How can the Town confirm that this number of animal units on Rob-n-Cin's property won't continue to climb beyond allowed limits, as it has in the past? The Town is setting itself up for failure with such a minimal condition.

For the reasons stated above, the Plan Commission should not approve the rezoning or CUP. We respectfully request that this letter be included in record of decision for the rezoning and CUP, and distributed to the members of the Plan Commission prior to their vote on the Petition for Amendment to Town Zoning Map and Accompanying Conditional Use Permit Application. Thank you for your attention to this matter. We are happy to discuss further.

Thank you.

Sincerely,

PINES BACH LLP


Christa O. Westerberg
Samanta R. Foran

encl.:

Attachment A: Correspondence with Town Clerk re: Notice Link
Attachment B: Letter from DNR re: Petition for Contested Case Hearing
Attachment C: Herd Size Calculations from DNR website

cc (via email): Atty. Jake Curtis

ATTACHMENT A

From: [TownAdmin](#)
Sent: Wednesday, January 7, 2026 5:51:09 PM
To: [Samantha Foran](#)
Subject: Re: Rob-n-Cin Farms Zoning Map Amendment and Conditional Use Permit
Sensitivity: Normal
Attachments:
[PHNotice2026.01.12RobNCin.pdf](#);

Thanks for notifying me of that. I'm not sure how that complex link got in there. I have adjusted it and attached the revised notice, which I also put on the website.

Cindy Komro

Administrator

Clerk

Zoning

TownAdmin@townoftrenton.wi.gov

Clerk@townoftrenton.wi.gov

262.675.6009 x106(office)

262.290.0154 (mobile)

262.675.6052 (fax)

Town of Trenton-Washington County

1071 Highway 33

West Bend, WI 53095-8958

Town Hall open Monday-Thursday 9am-3pm and Friday 9am-1pm

Building Inspector hours: W 3:00-5:00 p.m.

From: Samantha Foran <sforan@pinesbach.com>
Sent: Wednesday, January 7, 2026 5:20 PM
To: TownAdmin <townadmin@townoftrenton.wi.gov>
Subject: RE: Rob-n-Cin Farms Zoning Map Amendment and Conditional Use Permit

Thank you for the rezone application. Was a separate conditional use permit application filed?

The link I was referring to is the one found this sentence: The public may review copies of the application materials at [townoftrenton.wi.gov](https://townoftrentonwi.sharepoint.com/sites/Trenton/TownData/Planning-Zoning/Meetings-PHs/PublicHearings2026/PH2026.01.12.01Rob-n-Cin/townoftrenton.wi.gov). That link takes you to <https://townoftrentonwi.sharepoint.com/sites/Trenton/TownData/Planning-Zoning/Meetings-PHs/PublicHearings2026/PH2026.01.12.01Rob-n-Cin/townoftrenton.wi.gov> , which requires a log in.

Thank you,

Samantha R. Foran

Attorney at Law

608.251.0101 Phone

608.251.2883 Fax

sforan@pinesbach.com

Pines Bach LLP
122 W Washington Ave, Ste 900
Madison, WI 53703
www.pinesbach.com



Personal Service. Positive Outcomes.

From: TownAdmin <townadmin@townoftrenton.wi.gov>
Sent: Wednesday, January 7, 2026 12:02 PM
To: Samantha Foran <sforan@pinesbach.com>
Subject: Re: Rob-n-Cin Farms Zoning Map Amendment and Conditional Use Permit

See attached application.

The [link](#) works for me. You have to search "rob n cin" to get to all the materials. Let me know if you still have trouble. I would have to reach out to the DNR.

Cindy Komro

Administrator

Clerk

Zoning

TownAdmin@townoftrenton.wi.gov

Clerk@townoftrenton.wi.gov

262.675.6009 x106(office)

262.290.0154 (mobile)

262.675.6052 (fax)

Town of Trenton-Washington County
1071 Highway 33
West Bend, WI 53095-8958

Town Hall open Monday-Thursday 9am-3pm and Friday 9am-1pm
Building Inspector hours: W 3:00-5:00 p.m.

From: Samantha Foran <sforan@pinesbach.com>
Sent: Wednesday, January 7, 2026 11:50 AM
To: TownAdmin <townadmin@townoftrenton.wi.gov>
Subject: Rob-n-Cin Farms Zoning Map Amendment and Conditional Use Permit

Good afternoon, Ms. Komro,

I hope this email finds you well. I am writing to request a copy of the Petition for Amendment to Town Zoning Map and Accompanying Conditional Use Permit, submitted by Rob-n-Cin Farms, LLC.

I also wanted to let you know that the link to the application materials in the notice for the public hearing (found here: <https://townoftrenton.wi.gov/wp-content/uploads/2025/12/PHNotice2026.01.12RobNCin.pdf>) goes to a "sharepoint" file that is not accessible without a log in. The packet for the public hearing also does not contain the application materials. Please let me know if there is an additional place on the website I should look to for these documents.

Thank you,

Samantha R. Foran

Attorney at Law

608.251.0101 Phone

608.251.2883 Fax

sforan@pinesbach.com

Pines Bach LLP

122 W Washington Ave, Ste 900

Madison, WI 53703

www.pinesbach.com



Personal Service. Positive Outcomes.

Posted on the Town Hall bulletin board and on the town website
on December 26, 2025

**NOTICE OF PUBLIC HEARING – PETITION FOR AMENDMENT TO TOWN ZONING MAP AND
ACCOMPANYING CONDITIONAL USE PERMIT APPLICATION**

NOTICE IS HEREBY GIVEN that a Public Hearing will be held before the Town of Trenton Board and Plan Commission at the Town of Trenton Town Hall, 1071 STH 33 East, West Bend, WI 53095 at 6:15 p.m. on Monday, January 12, 2026. The Public Hearing will be held to accept public comments on an application submitted by Rob n Cin Farms, LLC. In accordance with Town Zoning Ordinances, Chapter 380, Article XII Changes and Amendments, Rob-n-Cin Farms has petitioned the Town to amend the Town of Trenton Zoning Map from EA Exclusive Agricultural District to AE Agricultural Enterprise District for Tax Key Numbers identified as T11_065200C and T11_064200D totaling approximately 141.34 acres. The amendment is requested to allow Applicant to apply for a Conditional Use Permit to expand its existing livestock facility under Town Ordinance Section 380-14C, Subsection (13) Livestock facilities of 1,000 or more animal units.

Rob-n-Cin Farms has included in its petition an application for a Conditional Use Permit (pending the outcome of the Zoning Map Amendment) to allow an expanded livestock facility of no more than 2,500 animal units.

The public may review copies of the application materials at townoftrenton.wi.gov, at the Town Hall during regular office hours or may request a copy of the application from Town Administrator Cindy Komro, townadmin@townoftrenton.wi.gov or 262.675.6009 x106. During the Public Hearing, Town of Trenton residents are invited to speak on the proposed amendment and Conditional Use Permit.

Written comments by any member of the public may be submitted to the Town Administrator and shall become part of the record. Written comments must be received by the Town Administrator no later than 3:00 p.m. on Monday, January 12, 2026 by email to townadmin@townoftrenton.wi.gov, or by postal mail or personal delivery to 1071 Hwy 33, West Bend, WI 53095.

The Public Hearing will be closed when all interested town residents in attendance have had the opportunity to offer comments. Upon the closure of any and all Public Hearings scheduled for Monday, January 12, a meeting of the Trenton Plan Commission shall be called to order, and the amendment shall be addressed per the agenda.

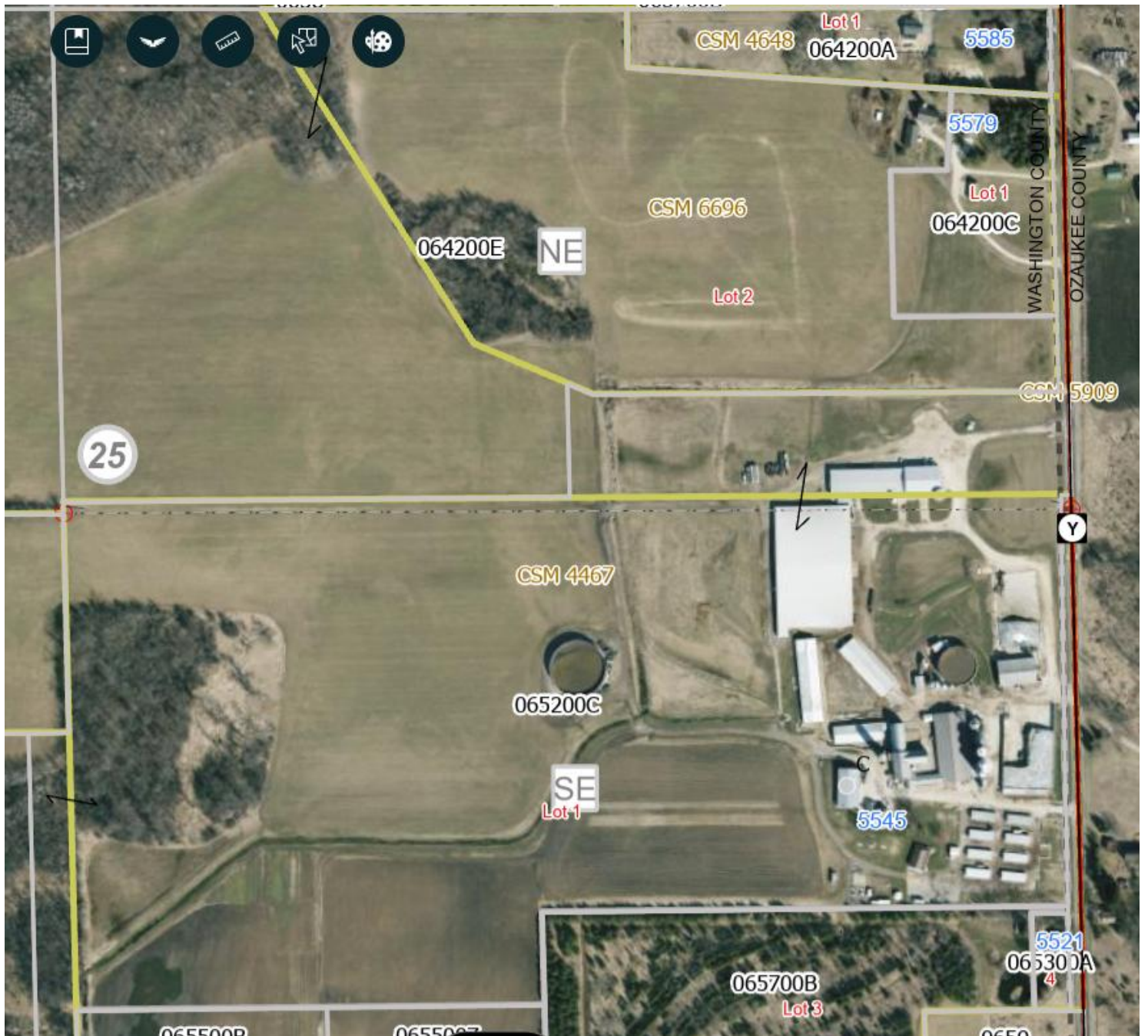
By: Mike Lipscomb, Trenton Town Chairman/Trenton Plan Commission Chairman
Dated this 26th day of December, 2025.

Application Materials:

Wisconsin Department of Natural Resources:

- Link: <https://permits.dnr.wi.gov/water/SitePages/Permit%20Search.aspx>
- Search: rob n cin to view all documents related to the permit

WPDES Permit: Town of Trenton website meeting page has various documents included in the "Agenda Packet" link



ATTACHMENT B



December 11, 2025

Attorney Adam Voskuil
Midwest Environmental Advocates, Inc.
634 West Main Street, Suite 201
Madison, WI 53703

Attorney Christa Westerberg
Pines Bach LLP
122 West Washington Avenue, Suite 900
Madison, WI 53703-2718

Subject: Petition for Contested Case Hearing in the matter of WPDES Permit No. WI-0067409-01-0 for Rob-n-Cin Farms, LLC., located at 5545 County Road Y, West Bend, WI 53095, 2141 W Center Road, Saukville, WI 53080, and 2314 W Hawthorne Drive, Saukville, WI 53080

Dear Attorneys Voskuil and Westerberg:

On November 26, 2025, the Department received, by hand delivery, your petition for a contested case hearing ("Petition") on behalf of Mark Hinchey, Roxanne Ramirez, Milwaukee Riverkeeper, Inc., Orchard Knoll Association, and Clean Waters, LLC. The Petition seeks a contested case hearing under § 283.63, Wis. Stats., for the Department's Wisconsin Pollution Discharge Elimination System ("WPDES") Permit No. WI-0067409-01-0 (the "Permit") which was issued by the Department to Rob-n-Cin Farms, LLC ("Rob-n-Cin") dated October 1, 2025.

Subject to § NR 2.05, Wis. Admin. Code, on December 2, 2025, the Department requested additional information regarding Petitioner Orchard Knoll Association and received from you on December 3, 2025, the document titled "Orchard Knolls Association, Neighborhood Formation & Purpose." In granting the Petition, the Department has assumed that the "Orchard Knolls Association" is the same entity as the named Petitioner "Orchard Knoll Association" and there is a typographical error either in the Petition or the Association document.

The Department grants the Petition under § 283.63, Wis. Stats., with respect to, and the hearing itself will be limited to, the following issues relating to the Permit:

- Issue 1. Is Section 1.6 of the Permit unreasonable because it will not ensure compliance with groundwater quality standards?
- Issue 2. Are Sections 1.7 and 1.8 of the Permit unreasonable because they do not ensure compliance with groundwater quality standards and do not allow the Department to determine compliance with permit conditions?
- Issue 3. Was the Department's action to issue the Permit unreasonable because the Permit application did not include information necessary for the Department to implement Wis. Stat. § 1.11?

In so far as your petition for a hearing under § 283.63, Wis. Stats. seeks to raise any other issues not specifically identified above, it is denied. Should it be determined that your Petition requests a hearing under § 227.42, Wis. Stats., your request is denied. In accordance with § 227.42(3), Wis. Stats., § 227.42, Wis. Stats., does not apply to

actions where hearings at the discretion of the agency are expressly authorized by law. The petitioners are expressly authorized to request a hearing under § 283.63, Wis. Stats., and, therefore, § 227.42(3), Wis. Stats., applies to this matter.

You may seek judicial review of the final decision included in this letter. To do so, you must file a petition in the appropriate circuit court and serve the petition on the Department within 30 days after the date this letter was mailed or otherwise served by the Department. A petition for judicial review must name the Department of Natural Resources as the respondent.

Attorney P. Duncan Moss will be representing the Department in this matter. Please contact him if you have any questions at (608) 977-1969 or Philip.Moss@wisconsin.gov.

Sincerely,

Signed by:

7A5DFE3497144B5...

Steven Little
Deputy Secretary
for
Karen Hyun, Ph.D.
Secretary

cc: P. Duncan Moss, DNR
Jason Knutson, DNR

ATTACHMENT C

Appendix A: Calculations

- Herd Size and Annual Waste Scenarios - 2026 and 2030
- Waste Generation and Storage Volumes – 2026 and 2030
- WSF6 Stage-Storage Table

PLANNING YEAR			2026		2030	
SITE	NR243 <u>MIXED</u> ANIMAL UNIT BASIS - CALCS	Avg Weight	1895 AU's		2925 AU's	
			Number	AU's	Number	AU's
RODEN ECHO VALLEY (REV)	Milking & Dry Cows	1,275	930	1,302	1,600	2,240
	Big Heifers (800 lbs to 1200 lbs)	1,000	80	88	160	176
	Calves up to 400 lbs	185	150	30	170	34
	Steers	750	50	50	50	50
W. CENTER RD. (CR)	Small Heifers (400 lbs to 800 lbs)	600	250	150	250	150
HAWTHORNE DR. (HD)	Big Heifers (800 lbs to 1200 lbs)	900	250	275	250	275
Animal Units (NR243 Mixed)				1,895		2,925
Total Annual Waste (gallons)			12,977,788		19,064,931	
Equivalent Days of Storage, Total Waste Basis			307		209	
Waste Handled as Liquid Basis (gallons)			11,880,724		17,584,592	
Equivalent Days of Storage, Liquid Waste Basis			335		226	

25yr, 24hr precip. ¹	4.73	inches
Net annual precip. ¹	21.12	inches
25yr, 24hr runoff (CN98) ¹	4.49	inches
Annual runoff (CN98) ¹	31.56	inches

NR243 Mixed

Conditions	Proposed
Planning Year	2026
Animal Units	1,895
County	Washington

Site	Animal Units
REV	1470
CR	150
HD	275

Date: 9/3/2025

Facility	Bottom Length (ft)	Bottom Width (ft)	Bottom Area (ft²)	sideslopes (xH:1V)	Total Depth (ft)	Top Length (ft)	Top Width (ft)	Top Area (ft²)	Total Capacity (gallons)		Waste Remaining (ft)	Freeboard (ft)	Runoff Area (ft²)	Feed Leachate (gallons)	Waste Remaining (gallons)	25yr, 24hr precip. (gallons)	25yr, 24hr runoff (gallons)	Freeboard volume (gallons)	MOL Volume (gallons)	Storage Duration (days)	Net Annual Precip. (gallons)	Annual Runoff (gallons)
WSF1 (1981 Slurry)	101.0		8,012	0.0	23.40	101.0	0.0	8,012	1,402,427	²	1.0	1.0	57,237	69,195	59,933	23,624	160,204	59,933	1,098,734	31	105,482	1,126,067
WSF2 (2018 Slurry)	145.0		16,513	0.0	23.40	145.0	0.0	16,513	2,890,503	²	1.0	1.0			123,526	48,690	0	123,526	2,594,762	73	217,405	0
WSF3	272.0		58,107	0.0	16.00	272.0		58,107	6,954,716	²	1.0	1.0			434,670	171,332	0	434,670	5,914,044	166	765,019	0
WSF5 (CR)	55.0	25.0	1,375	3.6	4.80	89.6	59.6	5,334	113,296	²	2.0	1.0			29,965	15,728	0	35,840	31,764	1	70,228	0
WSF6 (HD)	112.0	70.0	7,840	2.0	15.00	172.0	130.0	22,360	1,626,900	²	2.0	1.0			128,426	65,930	0	162,750	1,269,794	36	294,385	0

Liquid Waste Storage Summary				
Composite Total Storage:		12,987,842	gallons	
Composite Total MOL Storage:		10,909,097	gallons	
Annual Manure, Bedding, Milking Center WW, and Leachate				
From 313WSD		dairy	beef	total
TOTAL	Manure & Bedding:	8,412,929	116,042	8,528,971 gallons
LIQUID	Manure & Bedding:	7,397,095	34,812	7,431,907 gallons
Milking Center Wastewater:		1,799,210	1,825	1,801,035 gallons
Feed Leachate:		69,195		69,195 gallons
Annual Runoff & Precipitation				
Composite Contact Water Runoff Collected:		1,126,067	gallons	
Composite Net Precipitation on Storages:		1,452,520	gallons	

Days Storage - Total Waste Basis			
Total Annual Waste (solid & liquid):		12,977,788	gallons
Days of Storage Equivalent:		307	days
Days Storage - Haul Records Basis			
5-Year Haul Record Avg. Annual Liquid Waste:			gallons
Days of Storage Equivalent:			days
Days Storage - Waste Handled as Liquid Basis			
Annual Waste Stored as Liquid:		11,880,724	gallons
Days of Storage Equivalent:		335	days

Footnotes	
¹ From 313WSD, Ver. Feb. 2025	
² From 313WSD	
³	
⁴	

Feed Leachate		Notes:
Corn Silage	12,000 tons	
Haylage	6,500 tons	
P-Leachate	69,195 gallons	

Existing Contact Water Tributary Areas		Notes:
X-Outdoor Lot	ft²	
X-FSA1	29,582 ft²	
X-Stacking	ft²	
X-Tributary	ft²	
X-FSA2	27,655 ft²	

Proposed Contact Water Tributary Areas		Notes:
P-Outdoor Lot	ft²	
P-CLeaR CS FSA	ft²	
P-CleaR Haylage FSA	ft²	
P-Stacking	ft³	

NOTES:
1. Updated to current rainfall numbers in 313WSD, Version February 2025.
2. WSF4 is the solid stacking pad north of WSF3.
3. Updated nomenclature of CR Pit and HD Pit to match CAFO permit, WSF5 & WSF6 respectively.
4. Corrected Total Capacity of WSF5 (had 50'x30' bottom dimension in the 313 WSD previously & should have been 55'x25')

Dairy Animal Waste			
Site	Total	Liquid	PWW
REV	6,638,176	6,107,122	1,799,210
CR	723,553	238,773	0
HD	1,051,200	1,051,200	0
Total	8,412,929	7,397,095	1,799,210

Beef Animal Waste			
Site	Total	Liquid	PWW
REV	116,042	34,812	1,825
Total	116,042	34,812	1,825



25yr, 24hr precip. ¹	4.73	inches
Net annual precip. ¹	21.12	inches
25yr, 24hr runoff (CN98) ¹	4.49	inches
Annual runoff (CN98) ¹	31.56	inches

NR243 Mixed

Conditions	Proposed
Planning Year	2030
Animal Units	2,925
County	Washington

Site	Animal Units
REV	2500
CR	150
HD	275

Date: 9/3/2025

Facility	Bottom Length (ft)	Bottom Width (ft)	Bottom Area (ft²)	sideslopes (xH:1V)	Total Depth (ft)	Top Length (ft)	Top Width (ft)	Top Area (ft²)	Total Capacity (gallons)		Waste Remaining (ft)	Freeboard (ft)	Runoff Area (ft²)	Feed Leachate (gallons)	Waste Remaining (gallons)	25yr, 24hr precip. (gallons)	25yr, 24hr runoff (gallons)	Freeboard volume (gallons)	MOL Volume (gallons)	Storage Duration (days)	Net Annual Precip. (gallons)	Annual Runoff (gallons)
WSF1 (1981 Slurry)	101.0		8,012	0.0	23.40	101.0	0.0	8,012	1,402,427	²	1.0	1.0	57,237	69,195	59,933	23,624	160,204	59,933	1,098,734	21	105,482	1,126,067
WSF2 (2018 Slurry)	145.0		16,513	0.0	23.40	145.0	0.0	16,513	2,890,503	²	1.0	1.0			123,526	48,690	0	123,526	2,594,762	50	217,405	0
WSF3	272.0		58,107	0.0	16.00	272.0		58,107	6,954,716	²	1.0	1.0			434,670	171,332	0	434,670	5,914,044	113	765,019	0
WSF5 (CR)	55.0	25.0	1,375	3.6	4.80	89.6	59.6	5,334	113,296	²	2.0	1.0			29,965	15,728	0	35,840	31,764	1	70,228	0
WSF6 (HD)	112.0	70.0	7,840	2.0	15.00	172.0	130.0	22,360	1,626,900	²	2.0	1.0			128,426	65,930	0	162,750	1,269,794	24	294,385	0

Liquid Waste Storage Summary			
Composite Total Storage:	12,987,842	gallons	
Composite Total MOL Storage:	10,909,097	gallons	

Annual Manure, Bedding, Milking Center WW, and Leachate				
From 313WSD	dairy	beef	total	
TOTAL Manure & Bedding:	13,203,867	116,042	13,319,909	gallons
LIQUID Manure & Bedding:	11,804,758	34,812	11,839,570	gallons
Milking Center Wastewater:	3,095,415	1,825	3,097,240	gallons
Feed Leachate:	69,195		69,195	gallons

Annual Runoff & Precipitation		
Composite Contact Water Runoff Collected:	1,126,067	gallons
Composite Net Precipitation on Storages:	1,452,520	gallons

Days Storage - Total Waste Basis		
Total Annual Waste (solid & liquid):	19,064,931	gallons
Days of Storage Equivalent:	209	days

Days Storage - Haul Records Basis		
5-Year Haul Record Avg. Annual Liquid Waste:		gallons
Days of Storage Equivalent:		days

Days Storage - Waste Handled as Liquid Basis		
Annual Waste Stored as Liquid:	17,584,592	gallons
Days of Storage Equivalent:	226	days

Footnotes	
¹ From 313WSD, Ver. Feb. 2025	
² From 313WSD	
³	
⁴	

Feed Leachate			Notes:
Corn Silage	12,000	tons	
Haylage	6,500	tons	
P-Leachate	69,195	gallons	

Existing Contact Water Tributary Areas			Notes:
X-Outdoor Lot		ft²	
X-FSA1	29,582	ft²	
X-Stacking		ft²	
X-Tributary		ft²	
X-FSA2	27,655	ft²	

Proposed Contact Water Tributary Areas			Notes:
P-Outdoor Lot		ft²	
P-CLeaR CS FSA		ft²	
P-CleaR Haylage FSA		ft²	
P-Stacking		ft³	

NOTES:	
1. Updated to current rainfall numbers in 313WSD, Version February 2025.	
2. WSF4 is the solid stacking pad north of WSF3.	
3. Updated nomenclature of CR Pit and HD Pit to match CAFO permit, WSF5 & WSF6 respectively.	
4. Corrected Total Capacity of WSF5 (had 50'x30' bottom dimension in the 313 WSD previously & should have been 55'x25')	

Dairy Animal Waste			
Site	Total	Liquid	PWW
REV	11,429,114	10,514,785	3,095,415
CR	723,553	238,773	0
HD	1,051,200	1,051,200	0
Total	13,203,867	11,804,758	3,095,415

Beef Animal Waste			
Site	Total	Liquid	PWW
REV	116,042	34,812	1,825
Total	116,042	34,812	1,825



WSF6 (Hawthorne 1999 Geotex)

Bottom Area	7,840 sq.ft.	
Top Area	22,360 sq.ft.	
Side Slopes	2 xH:1V	
Total Volume	1,626,900 gallons	
1' safety	162,750	gallons
25yr, 24hr precip.	65,930	gallons
25yr, 24hr runoff	0	gallons
Total Volume Above MOL	228,680	gallons
Remaining waste volume	128,426	gallons
Usable Volume	1,269,794	gallons
Animal Units	1,895	
Annual Liquid Waste	11,880,724	

Stage		Elevation	Volume	Days
(ft)	(name)	(ft)	(gallons)	
0	TOP	120.0		
-1.0	*MOS	119.0		
-1.4	*MOL	118.6	0	0
-2.4		117.6	147,170	5
-3.4		116.6	287,864	9
-4.4		115.6	424,391	13
-5.4		114.6	548,964	17
-6.4		113.6	665,944	20
-7.4		112.6	778,781	24
-8.4		111.6	881,069	27
-9.4		110.6	976,468	30
-10.4		109.6	1,065,217	33
-11.4		108.6	1,149,942	35
-12.4		107.6	1,225,891	38
-13.0	2' SOLIDS REMAINING	107.0	1,269,794	39
-15.0	BOTTOM	105.0		

*MOS = Margin Of Safety (a.k.a., freeboard)

*MOL = Maximum Operating Level

Roxanne Hanna Ramirez<roxannehannaramirez@gmail.com>

TownAdmin

Hello, my name is Roxanne Ramirez and I live and farm at 4382 Hickory Rd West Bend, WI, 53090, about 7 minutes from the proposed CAFO site.

Our farm relies on groundwater for irrigation and washing the vegetables we grow. We go to great lengths to protect this natural resource, with annual water testing in compliance with our two organic certifications. We are not asking Roden to transition to organic or to farm like us. We are asking the DNR to uphold the protections put in place for a reason, rather than allow a huge risk to the Milwaukee River, Cedarburg Bog, and the groundwater that supplies water for residents, schools, and our child's daycare in Newburg which reported water contamination within the past year. Loopholes are a subversion of the purpose of the law, and the role of the DNR. There is no reason why this farm should not be required to submit to an environmental assessment and regular water testing. If they stand by what they do, and they mean what they say when they claim to care about the integrity of the natural area, then I see no reason why this would be so aggressively resisted. As I said, many farmers do it voluntarily anyway. Those are the farmers who need our support.

Thank you.

Dave Lauer<dlauer@enviro-mix.com>

james.salscheider@wisconsin.gov

TownAdmin;rep.gustafson@legis.wisconsin.gov;Sen.Stroebe@legis.wisconsin.gov

Mr. Salscheider,

I am writing today to express my concerns regarding the pending WPDES permit that may be granted to Rob-n-Cin Farms LLC 5545 County Road Y, West Bend, WI. The permit will allow 17 million gallons annually of untreated manure to be land applied across Washington and Ozaukee Counties.

From WIDNR data, the watershed is already compromised with high levels of bacteria and nutrients. The addition of tons of nutrients in the form of liquid manure will negatively impact the environment, health, and well-being of the surrounding communities.

What is of greatest concern is the consequences of land application of manure as it relates to the potential for private well contamination. There is little to no recourse for private homeowners in the event of well contamination, just ask the residences of Kewaunee County.

The Wisconsin DNR can reject Rob-n-Cin Farms' permit application to prevent the foreseeable contamination and unquestionable negative impact to hundreds of Washington and Ozaukee county residents. The DNR has an obligation to protect the environment, and the citizens of Wisconsin, not to protect the financial well-being of a factory farm.

Best Regards,

David Lauer

Lot #1 Decorah, Rd.

Trenton, WI

Jennifer Schleif<jsbschleif@gmail.com>

TownAdmin;leekidney@charter.net;dougcam6628@att.net;werhandr@gmail.com;
1dooerr@gmail.com;+4 others

Hello Town of Trenton Plan Commission and Board Members,

I am writing to express my strong opposition to the proposed Roden rezone from EA to AE. I urge the Town to pause any rezoning or approvals related to this operation until the DNR's contested WPDES permit case is fully resolved.

Because the permit is under formal challenge, the farm's proposed expansion is effectively on hold. Advancing the rezoning at this time would be premature and would place residents at unnecessary risk. Community members have consistently attended meetings to voice serious concerns, and more than 850 Town of Trenton residents have signed a petition opposing both the rezoning and the siting of a CAFO in our community. Proceeding despite this level of public opposition would signal that resident voices carry little weight in Town decision-making.

The current draft Conditional Use Permit is not designed for a large-scale industrial farm, despite repeated assurances from Town officials that a detailed, operation-specific CUP would be required. Relying on the contested WPDES permit does not protect residents from:

- **Declines in property values**
- **Increased and hazardous road traffic**
- **Continuous fan and machinery noise**
- **Persistent odors and air quality impacts**
- **Risks to private wells and surface water**
- **Other significant effects on daily life, health, and community well-being**

Additionally, AE zoning at this location would affect not only Trenton residents but also neighboring communities—my own family included—broadening the scope of potential harm. We also request that the Town require baseline and ongoing testing of private wells and surface water, with transparent reporting and clear remediation requirements. This essential protection is currently absent.

Town officials are elected to represent the interests of Trenton residents—not to accommodate a single operation that expanded to an industrial scale before securing appropriate Town approvals. Approving this rezoning without robust protections disregards both resident concerns and the Town's responsibilities.

I urge the Town to postpone the rezoning and public hearing until the DNR contested case is resolved, and to use this time to develop detailed, enforceable CUP conditions and operational ordinances that genuinely safeguard residents.

Thank you for your consideration.

Thank you,

Jennifer Schleif, West Bend

To: Cindy Komro - Town Administrator

Date: Dec. 30, 2025

Subject: Proposed amendment to town zoning map and Conditional Use Permit

We are opposed the rezoning that would change this area to an Enterprise District. This area has well-established neighborhoods we live in and a large Enterprise Operation would not be very compatible.

Hwy Y doesn't have much shoulders and is hilly near the farm. Increased truck traffic already makes driving more challenging on this road and it will get worse if more milk and manure is to be hauled. This road is used by bikers and hikers. If you rezone then the increased road use needs to be addressed.

We are concerned about diminishing air quality in our neighborhood - odor and dust - if this farm operation becomes an industrial enterprise. With more manure to spread there will be more days we have to stay indoors with windows shut.

We are very concerned about increased risk of contamination of underground sources of drinking water as the Rodens attempt to manage the large quantities of manure that would be generated. Our crop fertilization system already causes lots of environmental problems. We currently have times when our water has a strong odor but thankfully tests ok to drink. We are not convinced that the plans for management of large quantities of manure is sustainable even though the Rodens have the best intentions and all the surrounding neighborhoods would be affected if these plans go awry.

Other communities that have these operations have shown that property values decrease near the farm. Our property value just went up allowing the town to get more tax dollars from us but most likely the value will decrease as history usually repeats.

These large operations come with high risks to all of us living nearby. We recognize that we live in a rural area and that the farmers are challenged to make a decent living. However we believe that allowing the land to be rezoned comes with too high a risk to negatively and unfairly impact the existing neighborhoods in which we live.

Thank you for allowing us speak. Unfortunately we are out of town the week of the meeting so unable to attend so sending this letter.

Wayne & Janet Sharbuno

157 Orchard Knoll Dr

West Bend, WI 53095

Patti Silverman<patti.silverman@gmail.com>

Chairman;tony.thoma@washcowisco.gov;Supervisor Davies;anchormenswear@aol.com;+5 others

Dear Town Board and Planning Commission Members,

I am writing to express my strong opposition to the proposed rezoning to Agricultural Enterprise (AE) to allow Rob-n-Cin Farms to expand into a large industrial CAFO.

I respectfully urge you to **vote NO on the rezoning request** for several reasons.

Many families in Washington County, including my own, rely on wells for our water. Given the immense amount of liquid manure and other hazardous waste involved in this operation, contamination of local water sources is almost certain. Those of us on wells have no alternative water source, and the health implications of this farm cannot be overstated.

I have personally witnessed manure-hauling trucks running past my home for 12-hour days. Even though my property is not next to a large farm operation, I am still impacted by the odors, airborne particles, and hazardous materials these trucks disperse into the air across our community.

Our community is home to a thriving and diverse ecosystem. The land and waterways here support many species of wildlife and native plants, which are essential to the overall health of our environment. Pollution from this facility would have impacts far beyond human life, it would permanently alter our ecosystem.

We also have many small, local farms in this area that follow ethical practices in caring for their animals, the land, and our water systems. This is the kind of agriculture that strengthens our community and benefits the land. Large factory farms, like the one proposed, provide no such benefit. They only result in personal financial gain for their owners, while leaving lasting damage for the rest of us.

Please do the right thing for our community!

Thank you for your consideration,
Patti Silverman

Judy Stellmacher<stellmacher.judy@gmail.com>

Chairman;Supervisor Davies;TownAdmin

Good afternoon,

I am writing as a concerned resident of Washington County. I live in the Town of West Bend, I am a volunteer with the Sierra Club and a retired Public Health Nurse.

I have been following the CAFO permitting and the environmental issues related to a CAFO expansion for about three years. I have been present for a number of Plan Commission meetings. I have heard the experts and the residents voice their concerns about groundwater contamination, waterway contamination of nearby Cedar Creek, the Milwaukee River and the Cedarburg Bog.

I have heard the concerns about falling property values, the falling quality of life of local residents due to huge, noisy trucks speeding past their homes, the odors and air emissions. All of this resulting in health concerns.

My question is, how will the expansion to 2,500 animal units in the Town of Trenton, across several farms be a benefit to the Town of Trenton Community? I only see one benefactor, the Rodens. I see many residents hurt by the expansion.

Where is the full environmental impact report about this permit change?

What happens when 18 million gallons of manure is distributed throughout the area? Who will be monitoring groundwater, well water and the contamination of waterways?

You have heard from scientists, a geologist, environmentalists but most important, local residents in the Town of Trenton.

It is time to protect your community.

Sincerely,

Judy Stellmacher
Town of West Bend

From: Courtney Waters <watco7133@gmail.com>

Sent: Monday, January 5, 2026 3:41 PM

Subject: Opposition of Roden rezone from EA to AE

Hello Town of Trenton Plan Commission and Board Members,

I am writing to express my strong opposition to the proposed Roden rezone from EA to AE. I urge the Town to pause any rezoning or approvals related to this operation until the DNR's contested WPDES permit case is fully resolved.

Because the permit is under formal challenge, the farm's proposed expansion is effectively on hold. Advancing the rezoning at this time would be premature and would place residents at unnecessary risk. Community members have consistently attended meetings to voice serious concerns, and more than 850 Town of Trenton residents have signed a petition opposing both the rezoning and the siting of a CAFO in our community. Proceeding despite this level of public opposition would signal that resident voices carry little weight in Town decision-making. The current draft Conditional Use Permit is not designed for a large-scale industrial farm, despite repeated assurances from Town officials that a detailed, operation-specific CUP would be required. Relying on the contested WPDES permit does not protect residents from:

- **Declines in property values**
- **Increased and hazardous road traffic**
- **Continuous fan and machinery noise**
- **Persistent odors and air quality impacts**
- **Risks to private wells and surface water**
- **Other significant effects on daily life, health, and community well-being**

Additionally, AE zoning at this location would affect not only Trenton residents but also neighboring communities—my own family included—broadening the scope of potential harm. We also request that the Town require baseline and ongoing testing of private wells and surface water, with transparent reporting and clear remediation requirements. This essential protection is currently absent.

Town officials are elected to represent the interests of Trenton residents—not to accommodate a single operation that expanded to an industrial scale before securing appropriate Town approvals. Approving this rezoning without robust protections disregards both resident concerns and the Town's responsibilities.

I respectfully urge the Town to postpone the rezoning and public hearing until the DNR contested case is resolved, and to use this time to develop detailed, enforceable CUP conditions and operational ordinances that genuinely safeguard residents.

Thank you for your attention.

Courtney Waters Newburg, WI

Judi Wenzler<signasong2@gmail.com>

TownAdmin

Dear James Salscheider DNR Permit Drafter,

As a citizens of this community, we are concerned about the safety and impact that an industrial farm would have near our homes and our families health. Speaking specifically of The Roden Farm on County Hwy Y and its lands.

We are concerned about the dumping of potentially toxic contaminants onto our lands, into our water sources, airways and ultimately the humane care of the animals that The Roden Farm stewards. We do not want our community to become a needless dump for excess animal manure that it can't handle.

Our drinking water is another concern. Can you guarantee that our fresh water wells won't be affected by excess fecal material and animal urine? Personally, I have lived through stage 4 Non Hogkins Lymphoma. It is believed that that disease could potentially be caused by glyphosates over-sprayed on crops used to feed the animals.

Those glyphosate among other chemicals. Things such as waste medicines going through the cows digestive systems. would be uncontrolled and potentially seep into our fresh water wells. We do not think the farm owners are able to monitor their own work, as they are very interested primarily in their investment.

If this is passed, who will dig our wells deeper and who will pay for our water filtering? How will air quality and excess truck hauling on our roads be maintained? Taxes? That's the only way I can see this being funded...by us!

What will happen to our homes if our wells are condemned? Who is in charge of cleaning them to make them useable again?

Lastly, the humane care of the cattle. Do they see sunshine? At a field trip to this farm, The Roden Farm, We were told that the cows don't like being outside. So that begs the questions, Are they only in their stalls? Who is monitoring their quality of life? Their stalls get " cleaned" and who determines their health and ability to produce a quality product? The millions of gallons of water used to clean up will negatively affect our water tables.

Dave and Judi Wenzler
114 Orchard Knoll Dr(Town of Trenton)
West Bend, WI 53095



Date: Jan. 5, 2026

To: Town of Trenton Planning Commission

From: Dairy Business Association

Re: Rezoning and conditional use permit for Rob-n-Cin Farms

On behalf of the Dairy Business Association, I respectfully submit the group's endorsement of AE Agricultural Enterprise District rezoning and a conditional use permit to allow Rob-n-Cin Farms LLC to grow in the Town of Trenton.

Rob-n-Cin Farms is an example of a family dairy looking to reinvest in its business and the local community to continue a family legacy and have a positive impact on the rural economy — all while protecting the soil and water, caring for their animals and producing high-quality milk.

DBA strongly supports the Roden family's plans.

As background, the association is a Wisconsin nonprofit comprised of farmers and various business partners who work to ensure that dairy farms of all sizes and business models have the support necessary to keep America's Dairyland and its rural communities strong.

Dairy farms, no matter the size, need to continually explore ways to stay viable, just as any other business does. For dairy farmers, this may involve diversifying income streams through things like on-farm cheese processing. Or it might mean milking more cows, which Roden's are planning by way of a WPDES permit issued this past fall by the state Department of Natural Resources, the agency that regulates concentrated animal feeding operations in Wisconsin.

Robert and Cindy Roden and their family have operated their dairy farm in Trenton since the purchase of the original abandoned farm site in 1995. They started milking 300 cows. Through the hard work of family, friends and neighbors, the Roden's transformed an old free-stall barn and milking parlor setup, and over 30 years continued to modernize the facilities and gradually increase the size of the herd.

Bob and his son, Rick, are active in the local community, serving on various boards and being members of agricultural stakeholder groups that empower the Roden's to manage their farm with consideration of both industry and local issues. One example is Bob's leadership in a local watershed farmer group whose members identify with and implement conservation-focused farming practices that enhance the environment.

Environmental stewardship is a core value for the Roden's, who have had a comprehensive nutrient management plan in place for the last 15 years — meticulously detailing the rate, source, method and timing used in applying manure and other nutrients to the crops needed to nourish their animals. The Roden's utilize practices such as minimum tillage to minimize soil disturbance, and they use cover crops to minimize soil loss, keep nutrients in place and enhance organic matter in the soil. The Roden's also use an above-ground manure storage facility at their home farm as a further commitment to protecting water quality.

Years of careful and extensive planning and investments in ongoing improvements helped secure Roden's their permit from the DNR. Regulations for large farms in Wisconsin are among the most stringent in the United States — ensuring manure storage capacity, following a host of land application requirements, completing map and field verification procedures on an ongoing basis, and maintaining detailed manure spreading logs and filing annual reports, to name just a few.

While the town's decision on the rezoning and conditional use permit for Rob-n-Cin Farms is a local one, it's important also to consider the larger context. Demographic, lifestyle and marketplace changes have resulted in an ongoing reduction in the number of dairy farms statewide. The total of 5,100 dairies operating in Wisconsin in December was nearly half the number of 10 years ago.

Wisconsin must keep our dairy community strong. The industry accounts for nearly \$53 billion in economic impact, or 6.5% of all state revenues. And jobs tied directly to farms and processors total more than 120,000, or 3.3% of the entire workforce in Wisconsin. The positive impact is even greater when considering the suppliers, manufacturers, lenders, veterinarians and so many others tied to the dairy community. Agriculture drives our rural communities, and dairy plays the most significant part.

At the same time as they are fueling the state and local economies, farmers like Roden's understand their important role as stewards of the environment. In addition to their own well-established conservation practices, the Roden's are even leaders in helping other farmers in the area implement such practices that work best for their individual farms.

The family is committed to meeting, and even exceeding, the DNR's requirements. An example of this commitment: A year ago, the farm began working with DBA's Maestro program, which is a consultant-based resource to assist the Roden's in meeting the unique permit requirements of their farm. The program was developed to address the complexities of the permitting process and to give farmers access to trusted resources and reliable experts to assist with ongoing compliance efforts.

Opponents of the Roden's' growth might point to legal action taken to challenge the farm's DNR permit as reason for the town to delay or deny the rezoning and conditional use permit. The process of contesting a WPDES permit can take years. Rob-n-Cin Farms have cleared the high bar of the DNR after an extensive process. If requirements of the permit were to change at some point later, the farm would undoubtedly meet or exceed them as well.

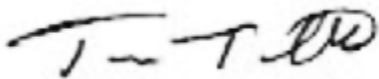
Regardless of the recent challenges to the issued WPDES permit, the permit is effective as of 10/01/2025. Roden's need to comply with all existing requirements and provisions until the contested case hearing with the DNR is finalized. It is possible that there could be a change to permit requirements, however, Roden's are and will continue to be a state regulated CAFO and will need to comply with all permit requirements.

It's important to note that the Roden's also value transparency. They encourage the community to learn more about their farm and their farming practices. They host Roden Barnyard Adventures, which invites school and public groups to come out to experience the farm, from interactive online games about conservation practices to hands-on feeding of calves. The Rodens have hosted numerous tours over the years as well.

The Roden's are looking to the future as they build on a strong foundation of family, community, animal care and environmental stewardship.

DBA recommends that the Town of Trenton Planning Commission approve the proposed rezoning and conditional use permit for Rob-n-Cin Farms.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Trotter".

Tim Trotter
CEO
Dairy Business Association

todd@lorriganconstruction.com

TownAdmin

Town of Trenton Administrator

I send this email in support of the Roden's getting the rezoning and conditional use permit they are asking for! In my capacity with the company I work for I meet and work with a lot of different farming enterprises and I can honestly say the Roden's are one of the best that I deal with. They are great stewards of the farm they run and are exceptional advocates for agriculture in your area. Prime example is all the leadership roles multiple members of the family take in the community, the tours of their facility that they are willing to give to anyone, the camps for kids in the summer all help bolster the positive image of the agriculture community in your area. By approving the rezoning and the permit it will help them further their business model and will also help strengthen the image of agriculture throughout the region.

Thanks,

Todd Maney
Sales Consultant
Bill Lorrigan Construction Inc.
Office : 920-754-4723
Cell: 920-901-0923

Kris Groth<pkjgroth@aol.com>

TownAdmin

On the subject of the Roden Family farm, this is not a black-and-white decision. We must consider both the long history of farming in our town and the specific history of the Roden family. The number of farms today is only a fraction of what it was 30 years ago, and farm culture as a whole has changed drastically. As a community, we need to recognize that reality. Decisions like this will have impacts far beyond what many people realize.

If you take the time to research the Roden family, it becomes clear that they have consistently gone above and beyond. They were practicing soil conservation long before it became common, and they have dedicated themselves to educating people throughout our community about where our food comes from. Their farm has remained open for tours and public education, and they are known for the way they treat and educate their employees, including those who come from around the world.

To me, it would be a shame to impede a family that has made every effort to do things the right way and to deny them the opportunity to continue being successful in the future.

Roland Gutknecht<rgutknecht@qcservicesfdl.com>

TownAdmin

Hello,

I wanted to voice my approval for the rezoning of the farm land to be used as the cafo operation.

Roland Gutknecht

790 Paradise Drive and 5535 S. Church Road, West Bend.

January 8, 2026

Town of Trenton Plan Commission
Town of Trenton Hall
1071 Highway 33
West Bend, WI 53095

Dear Town of Trenton Plan Commissioners,

I am writing in support of the Rob-n-Cin Farms LLC, Zoning Map Amendment and Conditional Use Permit request.

I worked for the Ozaukee County Land & Water Management Department for 37 years serving as Director. During that time, I had the opportunity to work with Rob-n-Cin Farms (Bob Roden and his family), on agricultural Best Management Practices to reduce soil erosion and improve water quality. I have always found Roden's to be good stewards of the land, to protect and improve our land and water resources.

Rob-n-Cin Farms utilize no-till planting, cover crops, and low-disturbance manure applications to improve and protect water quality. They also follow a State approved nutrient management plan.

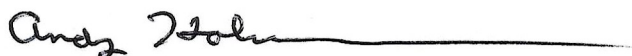
Rob-n-Cin Farm's cropping and manure management practices are improving the health of the soil. As a result of improved soil health, the soil absorbs more rain, which results in less soil erosion and runoff; the soil nutrient cycling capability increases which lessens the usage of commercial fertilizer; carbon stored in the soil increases, the release of carbon dioxide gas into the atmosphere is reduced since they do very little tillage; and pesticide usage is minimized. Overall, healthy soil provides cleaner water, a healthier environment, healthy food, and healthier people.

The Roden's recently adjusted their manure management plan to improve soil health and maximize the nutrient uptake by the crops. In the past manure was applied once a year at a higher rate. They now split the manure application rate and apply manure at a lesser rate, twice a year on a field using a low disturbance manure injector. These split applications are found to be more beneficial to promote soil microorganisms, allowing for better infiltration and cycling of nutrients. The manure is also applied to fields which have living roots (cover crops), which uptake manure nutrients, tying them up, effectively reducing nutrient runoff. These nutrients are then available for the following crop. This manure application practice is environmentally friendly and is being promoted on other farms locally and throughout the State to improve water quality.

Bob Roden presently serves on the Clean Farm Families Board, a local farmer-led group established to promote healthy soil and improve water quality.

As we know, agriculture is an important and valued land-use.

Respectfully submitted by,



Andy Holschbach
Former Director, Ozaukee County Land & Water Management Department

12/29/2025

Attention: Town of Trenton Planning Commission

After two long years working on the Roden farm request for a CAFO, listening to all sides we can now make an intelligent and informed recommendation to the Town of Trenton Board.

The citizens of the Town of Trenton have made it clear that they want to see the Town stay a rural community. To do that, we need to preserve our farm land. In the 25 years that I have served on this committee we have gone from many small farms to a few large ones. With the price of farm machinery and Governmental regulations small farms are no longer profitable.

The animal units in our Town has not changed in the last 25 years. The way the animals are housed has changed. The large farms rely on farm land to plant crops for feed. Without the revenue that the small farms tracts receive in rent, they would need to look to alternative ways for income. We might see more subdivisions and maybe even Data Centers.

I urge my fellow commissioners to recommend to the Town Board to allow the Roden petition.

Sincerely,

Scott Schweizer

From: Frank Stangl <FStangl@weimerbearing.com>

Sent: Thursday, January 8, 2026 3:43 PM

To: TownAdmin <townadmin@townoftrenton.wi.gov>

Subject: Comments on Approving Zoning for Roden farm

Board and Planning commission,

I am writing to express my desire that the zoning be approved for the Roden Farm. As a Trenton resident(resided on HWY Y since 1980) that lives very, very close to the Roden Farm—I see no reason not to approve.

In addition to my home on Washington Drive, I purchased a home and acreage on St. Augustine road in September of 2024(during the height of this controversy). Roden has been farming the land I bought and the land surrounding the land for 20 plus years. The house well checked out fine.

If I felt that the Roden farm was a detriment(health, noise or smell) to my properties or my family, I would of never bought the house on St. Augustine or continued to beautify my house/land on Washington drive. I am surrounded by land farmed by the Rodens.

My hope is that many of my children decide to return in adulthood and live in the same house/land as I have--- and enjoy the kind of community I grew up in and continue to have with all my farming neighbors(Gall, Rathke,Roden and Wollner).

Frank Stangl

144 Washington Drive

West Bend, WI 53095

To Whom It May Concern:

After doing an agritourism internship in New Jersey and then graduating from UW-River Falls with an Agriculture Marketing & Communications major, I knew I wanted to come back to my family farm and start a business that would educate people about modern-day agriculture. My dream of coming back to the family business has been made possible by the strong support of my family and the farm: Roden Echo Valley.

I am grateful to be one of the few people in my generation to have grown up on a farm, and even more grateful to be able to share a glimpse of that lifestyle with people in our community. Roden Barnyard Adventures has become a place where dreams come true for many children (& even adults). People who come for a farm tour, birthday party or farm camp can see first-hand how we care for our animals and how their food is made. Everyone who comes for a tour gets the chance to feed a baby calf a bottle, and sometimes they can even see a baby calf being born! Visitors get to walk in the barns, see where our feed and manure is stored, in addition to seeing where we milk our cows. The new rotary milking facility has a viewing area for visitors to see the process & ask questions. Visitors are very impressed with the "merry-go-round" where the cows get milked, and often leave learning more than they expected and appreciating the work farmers do each day to put food on their table.

Offering tours on dairy farms is not uncommon to the industry. There are many farms throughout the state that offer tours including Kelley Country Creamery, Sassy Cow Creamery, Pagel's Ponderosa Dairy and Crave Brothers Cheese, to name a few.

We welcome people to schedule a visit, ask questions and learn about modern-day dairy farming. To see what we all have to offer or to set up a tour, you can visit our website www.rodenbarnyard.com.

To help my business continue to grow, I support the rezone and Conditional Use Permit for Rob-N-Cin Farms.

Make it a DAIRY good day!

Jacki Moegenburg
Owner, Roden Barnyard Adventures

To Whom It May Concern:

Roden Echo Valley, LLC is a multi-generational family farm in the Town of Trenton, owned by Bob and Cindy Roden, Rick and Melissa Roden, and Joe Roden. We take great pride in producing high-quality milk while providing the best care for our animals and serving as stewards of the land.

Dairy farming has been a long-time family tradition for the Roden family, and through the years we have embraced technology and expanded the herd to allow for more family members to join the family business. Bob and Cindy's son Rick joined the farm in 2003 by purchasing heifers, their daughter Jacki opened her business, Roden Barnyard Adventures, LLC, in 2014, and Bob's brother Joe became part owner in 2022.

Our farm received the concentrated animal feeding operation (CAFO) permit in October 2025, which is heavily regulated by the United States Environmental Protection Agency (EPA) and the Department of Natural Resources (DNR). Since 2010, we have spent thousands of dollars in engineering fees to meet current EPA and DNR regulations. We have certified crop consultants that provide us with a nutrient management plan that is submitted to the DNR for approval annually.

Currently, the farm consists of different entities to be able to farm. Rob-n-Cin Farms is applying for the conditional use permit because Rob-n-Cin Farms owns the land. Rob-n-Cin Farms, Roden Echo Valley and Roden Barnyard Adventures are all LLC's that are a part of the business. Roden Hfr Ctr, located in the Town of Saukville in Ozaukee County, is also part of Rob-n-Cin Farms where animals for the farm are raised, we grow crops and have land for disposing waste.

The farm owns land in the Towns of Trenton, Saukville and Fredonia. We also lease several acres in five other townships for feed production and animal waste disposal.

Since 1992, the Roden family has hosted the Breakfast on the Farm five times, most recently in June 2023. Prior to Roden Barnyard Adventures opening in 2014, Bob and Cindy did numerous farm tours for school and civic groups. We are always open to sharing what our farm has to offer and find it important to educate the public about agriculture.

We look forward to having our farm continue to be an essential part of the community for years to come and invite you to come to the farm to learn more. If you have any questions, contact Bob Roden at 262.689.1037 or robncinfarms@gmail.com or Rick Roden at 262.689.1038.

Sincerely,

Bob and Cindy Roden, Rick and Melissa Roden, Joe Roden

January 6, 2026

Town of Trenton Plan Commission
P.O. Box 259
Newburg, WI 53060

Subject: Public Comment on the Approval of Rob-n-Cin Farms Zoning and Conditional Use Permit

To Whom It May Concern:

On behalf of the Washington County Farm Bureau, we write in support of the approval of a rezone to Agricultural Enterprise District and a Conditional Use Permit for Rob-n-Cin Farms. The farm is largely located within Washington County and plays a significant role in the nearly \$63 million of milk produced within the county. As the agricultural industry throughout the state of Wisconsin is growing and evolving, Roden Echo Valley, LLC has equally needed to grow and evolve and has received their permit to be a concentrated animal feeding operation (CAFO), subjecting them to more stringent federal and state regulations.

Operating as a multi-generational family farm in the Town of Trenton, the farm is owned by Bob and Cindy Roden, Rick and Melissa Roden, and Joe Roden. The Roden Family has long proven to be strong stewards of the land and have equally provided countless unique agricultural education opportunities for children and families through Jacki Moegenburg's business, Roden Barnyard Adventures.

The Roden Family has been very open and transparent to sharing their farm with the community and hold a core value in educating others about agriculture here in Wisconsin. Their continuous service to the community is clearly demonstrated through their willingness to regularly host the annual Breakfast on the Farm for both Ozaukee and Washington Counties. Members of the Roden Family continue to be strong leaders within Farm Bureau, serving on local county boards and serving on several Wisconsin Farm Bureau Federation state-wide committees. With such strong and deep agricultural ties, the Roden Family and their farm easily serve as premier examples of agricultural and environmental stewardship.

Washington County Farm Bureau asks the Town of Trenton Plan Commission to support the rezone and Conditional Use Permit for Rob-n-Cin Farms.

Sincerely,



John Falk,
Washington County Farm Bureau President

Brad Weber<bweber20@gmail.com>

TownAdmin

Dear Town Board,

I am writing to express my support for Bob Roden's request to rezone his property to allow for expanded operations. As a third-generation owner of farmland in the Town of Trenton, and growing up farming on that land, I understand the importance of conservancy and environmental stewardship. This request aligns with Wisconsin's proud tradition of agricultural heritage. I would like to see that continue into the future.

Modern farming practices have undergone significant improvements incorporating advanced technologies for manure management, water conservation, and animal health. These innovations reduce environmental risks and promote sustainability. In addition, increasing local dairy production helps maintain food security and keeps Wisconsin's reputation as "America's Dairyland" strong. They also help balance economic development with environmental responsibility by supporting the long-term vitality of our agricultural community.

I urge the Town Board to approve Mr. Roden's request.

Thank you for your consideration.

Sincerely,

Brad Weber

bweber20@gmail.com

262-388-0752

2067 Pine Ridge Ct. Unit E

Grafton, WI 53024

Stoney Acres III

5365 Hwy M

West Bend, WI 53095

Dennis Woznicki<dwozw30@gmail.com>

TownAdmin

My wife and I (Dennis and Ann Woznicki) support the Roden farm. Please rezone the farm it has been there for almost 100 years. The Roden's are good people. I like cheese on my pizza and ice cream.

January 9, 2026

Town of Trenton Plan Commission
P.O. Box 259
Newburg, WI 53060

To Whom It May Concern:

Farmers are great stewards of the land and I support any farm that wants to expand, including those who are permitted to be a concentrated animal feeding operation (CAFO).

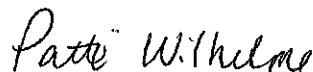
Many community members don't understand the rules and regulations that farmers have to abide by, and those rules and regulations have become more stringent now that the farm has become a CAFO. Land application of manure is not something that is done every day, it is highly regulated by the farms nutrient management plan and farmers can only apply manure at certain times of the year to avoid runoff. I don't believe the Town of Trenton should put more regulations on the farmers, as they are already highly monitored at the state and federal level, and I don't believe the Town of Trenton needs to request that the farm submit all the forms that are part of the WPDES Permit to the Town of Trenton.

I currently live near Roden Echo Valley, LLC and would much rather live next to the farm and farmland versus living in the city or a residential developed area. Buying property in the country was a choice, I understood the smells, noise and traffic that come with it. The farm is on a county highway, so it's not just farm traffic but a lot of truck traffic on the road at all times of the day.

The farm is a multi-generational farm and does a lot of educating to the public. The Roden family is totally transparent to everything that happens on the farm, welcoming school groups and thousands to the 2023 Washington County Breakfast on the Farm. The farm has supplied many jobs to Town of Trenton residents and hopes to continue supporting the community for many years to come.

If you ate today, be sure to thank a hard-working farmer for the food on your table, and let's support Roden Echo Valley, LLC by approving their rezone and Conditional Use Permit.

Sincerely,

A handwritten signature in cursive script that reads "Patti Wilhelme".

Patti Wilhelme
Town of Trenton Resident