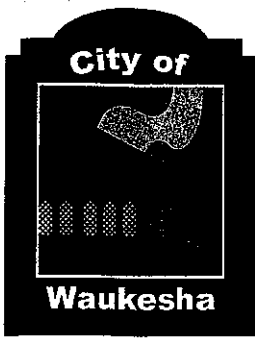


EXHIBIT

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OFFICE OF THE MAYOR

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Shawn N. Reilly, Mayor

sreilly@waukesha-wi.gov

October 8, 2019

Brian Tom Fischer, Town Chairperson
Town of Waukesha
W250S3567 Center Road
Waukesha, WI 53189

Dear Chairperson Fischer,

Pursuant to Wis. Stats. §66.0307(4)(c), the City of Waukesha offers the following comments to the Proposed Intergovernmental Cooperative Plan between the Town of Waukesha and the Town of Brookfield. The City of Waukesha appreciates consideration of these comments prior to adoption of the final plan by both communities.

Generally, there is an absence of detail and information regarding the statements made throughout the Plan. As presented, the Plan is not a plan to accomplish anything, it is a statement of status quo between the towns.

Please provide more information and detail to Section 4, Purposes. In subsection a, it is asserted that the plan will increase governmental efficiency through the sharing of services provided separately by Brookfield and Waukesha, and that it will eliminate duplicative or unnecessary expenditures. No explanation is provided as to what efficiencies will be obtained, which duplicative and unnecessary expenditures will be eliminated, and what savings will be realized. Please describe the services that are presently provided separately by the communities and which services will be shared after implementation of the plan. How and when will the sharing of services and the elimination of duplicative or unnecessary expenditures occur?

In addition, Section 4 states that the establishment of the Joint Planning Area will "assure orderly development," but does not explain how orderly development will be assured. Please provide detail as to how this goal will be achieved.

In Section 5, Consistency with Comprehensive Plans, the Plan states that it will result in "solidification of Town borders to create an environment for effective and efficient planning for the Town of Waukesha." The Plan is proposed to be between two towns, neither of which has the ability to annex land of the other. The boundary between the two towns can be altered only by the mutual agreement of the parties, it cannot be forced by one on the other, so there's no need for an agreement to "solidify" the border. The mutual border between the two parties is 0.25 miles, or 440 yards. The lands on either side of this quarter-mile shared border are already fully developed. The Plan gives no explanation of how the towns' mutual border could be threatened by either party, why there is a need to solidify the boundary between two towns, or how the Plan would accomplish the solidifying of the border. There is no description of how the hypothetical solidification would affect the environment for effective and efficient planning by the towns. Please describe why the towns' borders must be solidified, how they would be solidified, and how solidifying the borders would change the planning environment from its current status.

In Section 6, Content of the Plan, there is a statement that "adequate provision has been made for the delivery of necessary municipal services" without any detailed description of which services or how the provision of those services will be accomplished. There is no schedule for the delivery of services and no explanation of how those services would be delivered. Please provide details to demonstrate that adequate provisions have been made for the delivery of services.

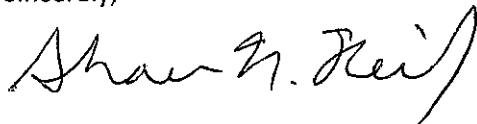
In Section 7, Joint Planning Area, the Plan fails to provide any detail as to how the Joint Planning Area (JPA) will be redeveloped and how it will benefit from redevelopment. The "review" of any land use changes in the Joint Planning Area is voluntary and any recommendation is advisory, not mandatory. The Plan does not explain why or how these voluntary, non-binding provisions "facilitate redevelopment" in this area. Furthermore, Town of Brookfield residents receive no benefit from the JPA provisions and cannot prevent unwanted or undesirable development within this area.

In Section 8, Municipal Services, the Plan states that there is a "type of development and redevelopment within the Joint Planning Area contemplated by Brookfield and Waukesha," but it does not provide any detail as to what development is contemplated. The vast majority of the property in the JPA is not within the sewer service area served by the Town of Brookfield Sanitary District No. 4. The plan does not provide information as to how the Town of Brookfield will provide such service, what approvals are necessary, or what the potential costs to the Town of Waukesha will be. Exactly how does this plan facilitate redevelopment any differently than does the existing circumstances between the two communities?

The Cooperative Plan is not a cooperative plan. It does not fairly inform the Town's own residents of the purpose of the Plan or its potential effects on them, good or bad. It likewise does not provide enough detail for neighboring municipalities to fairly evaluate its purpose and effect. Please explain how this plan is more than an exercise to check off a box in the towns' attempt to incorporate under Wis. Stats. §66.02162.

The City of Waukesha looks forward to your consideration of these comments prior to final approval of the Plan, as required by Wis. Stats. §66.0307(4)(d).

Sincerely,



Shawn N. Reilly
Mayor

cc: Kathy Nickolaus, Administrator, Clerk/Treasurer