Permit Fact Sheet

General Information

Permit Number:	WI-0050245-10-1 *Modification
Permittee Name:	CEDAR GROVE CHEESE FACTORY
Address:	P O BOX 185
City/State/Zip:	PLAIN WI 53577
Receiving Water and Discharge Location:	Channelized agricultural ditch (unnamed) that joins Honey Creek, in the Honey Creek (LW-16) Watershed of the Lower Wisconsin River Basin.
StreamFlow ($Q_{7,10}$):	Channelized ditch 0 cfs; Honey Creek 6.2 cfs
Stream Classification:	Not listed in ch. NR 104, Wis. Adm. Code however, considered Limited Aquatic Life (LAL) water, non-public water supply to be protective of downstream aquatic life.

Facility Description

Cedar Grove Cheese Factory (Cedar Grove Cheese) is an existing discharger with an annual average discharge of 0.004506 MGD (based on effluent volume measured in the living machine). Cedar Grove makes cheddar cheese and a variety of other cheeses. Wash water from cheese making process is stored in a 6000 gallon equalization (EQ tank) which is subsequently treated in an aerobic wastewater treatment plant ("Living Machine") which consists of a series of ten tanks containing a mixture of aquatic plants and microorganisms that feed on organic materials in the wastewater. The EQ tank receives wash water, spillage, and water from floor drains. Procedures are in place to reduce the amount of milk, whey, and salted whey sent to the EQ tank for optimal operations of the living machine. There was an overflow on the EQ tank that went directly to the lagoon that has been closed off. Treated wastewater from the living machine is discharged to a pond (originally designed as an absorption pond) and then an unnamed tributary to Honey Creek. This pond is approximately 290 yards by 10 yards and six feet deep. The pond was last dredged more than 15 years ago.

The department has determined that the location of the current effluent samples for outfall 002 may not be representative of the discharge at the point at which the discharge enters waters of the state. Code (s. NR 205.066(1), Wis. Adm. Code) requires that "monitoring shall occur at the point of discharge or at the internal waste stream if the permit limitations are imposed on the internal waste stream under s. NR 205.065 (2) unless an alternative location is established by the department in the permit." Any alternative location would need to be representative of the effluent quality at the point of discharge to a water of the state. The existing lagoon/pond has not been officially abandoned and additional evaluation is needed. The permittee is in the process of approval for lagoon abandonment at the time of this permit modification. Therefore, the permit has been updated to include a schedule to investigate the lagoon/pond to determine if the permittee will maintain the lagoon or complete the abandonment process. The proposed permit includes schedules to determine compliance with all limits and the status of the lagoon. If the lagoon is not properly abandoned monitoring and limitations will be required at the v-notch weir at the end of the lagoon next permit term. Additionally, this permit term is notification to the permittee that the receiving water is an unnamed tributary to Honey Creek that after field verification has been determined to be Limited Aquatic Life (LAL). However, this classification may require administrative code changes that are not currently in place. It is anticipated that BOD and TSS concentration, in addition to the mass limits, will become effective within the first 2 years of the next permit reissuance. The permittee should consider the BOD and TSS concentration limits in the WQBEL dated 12/20/2021 before making any plant upgrades or operational changes. Please be in close contact with the department regarding updates on the code changes for LAL waters not currently listed in ch. NR 104, Wis. Adm. Code.

The waste from the EQ tank (outfall 004) is either directly land applied on sites specifically approved for liquid industrial waste, taken to offsite manure storage pits (less than 10% industrial wastewater), or disposed of at municipal wastewater treatment plants. The 3000-gallon Salt Whey Tank stores waste from the whey separator, salted whey wastewater, and

first rinse milk tank water. The Salt Whey Tank waste (outfall 005) is either land applied directly on sites specifically approved for industrial waste, taken to manure storage pits (volume limited to less than 10% of total wastewater volume) or disposed of at a municipal wastewater treatment plant. Outfall 006 is for sludge from the Living Machine. In the previous permit term almost all waste from the storage pits was hauled to a municipal treatment plant.

Permit modification -1 completed to include Water Quality Trading following the conditional approval of the WQT Plan dated 6/10/2026. This includes removal of MDV requirements as of the effective date of the modification except for one last payment requirement for the months in 2026 that the MDV was in effect.

Substantial Compliance Determination

Enforcement During Last Permit: The facility has completed all previously required actions as part of an enforcement process. The department identified several issues that require additional evaluation regarding the lagoon/pond and legal point of standards. The permittee has been cooperative and supportive of finding the best long-term compliance option(s).

After a desktop review of all discharge monitoring reports, land application reports, compliance schedule items, and a site visit on 1/26/2022, the permittee has been found to be in substantial compliance with their current permit.

Sample Point Designation		
Sample Point Number	**Discharge Flow, Units, and Averaging Period**	**Sample Point Location, WasteType/sample Contents and Treatment Description (as applicable)**
002	0.004059 MGD (January 2017 through June 2021)	Aquatic living machine treatment plant effluent discharge. Effluent flow monitoring collected at a point just prior to the pipe discharging from the treatment building.
004	Waste hauled to Wastewater Treatment Plant – 67000 gallons (2022)	Land application from the EQ tank. Liquid industrial wastewater sent to the living machine treatment plant or land applied. Representative sample to be taken prior to land application. No sampling required if no land application occurs in a calendar month.
005	Waste hauled to Wastewater Treatment Plant – 259000 gallons (2022)	Land application from the Salt Whey Tank. Liquid industrial wastewater. Representative sample to be taken prior to land application. No sampling required if no land application occurs in a calendar month.
006	Waste hauled to Wastewater Treatment Plant – 133998 gallons (2022)	Land application from the Living Machine Sludge Tank, Liquid Industrial Sludge. Representative sample to be take prior to land application. No sampling required if no land application occurs in a calendar month.

1 Surface Water - Proposed Monitoring and Limitations

Sample Point Number: 002 - Treatment Plant Discharge (Manhole)

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Flow Rate		gpd	Daily	Total Daily	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
BOD5, Total		mg/L	Weekly	Grab	
BOD5, Total	Daily Max	9.2 lbs/day	Weekly	Calculated	
BOD5, Total	Monthly Avg	4.6 lbs/day	Weekly	Calculated	
Suspended Solids, Total		mg/L	Weekly	Grab	
Suspended Solids, Total	Daily Max	9.2 lbs/day	3/Week	Calculated	
Suspended Solids, Total	Monthly Avg	4.6 lbs/day	3/Week	Calculated	
Suspended Solids, Total		lbs/day	3/Week	Calculated	Report daily mass discharged using Equation 1a. in the Water Quality Trading (WQT) section.
WQT Credits Used (TSS)		lbs/month	Monthly	Calculated	Report WQT TSS Credits used per month using Equation 3c. in the Water Quality Trading (WQT) section. Available TSS Credits are specified in Table 2 and in the approved Water Quality Trading Plan.
WQT Computed Compliance (TSS) – Monthly Avg	Monthly Avg	20 mg/L	Monthly	Calculated	Report the WQT TSS Computed Compliance value using Equation 5a. in the Water Quality Trading (WQT) section. Value entered on the last day of the month.
WQT Computed Compliance (TSS) – Weekly Avg	Weekly Avg	30 mg/L	Weekly	Calculated	Report the WQT TSS Computed Compliance value using Equation 5b. in the Water Quality Trading (WQT) section. Values entered on the last day of each week.
WQT TSS Credits Used	Annual Total	33,420 lbs/year	Annual	Calculated	Limit effective for 2026 only. The sum of total monthly credits used may not exceed Table 2 values listed below.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
WQT TSS Credits Used	Annual Total	57,300 lbs/year	Annual	Calculated	Limit effective beginning in 2027. The sum of total monthly credits used may not exceed Table 2 values listed below.
pH Field	Daily Min	6.0 su	Weekly	Grab	
pH Field	Daily Max	9.0 su	Weekly	Grab	
Dissolved Oxygen	Daily Min	4.0 mg/L	Weekly	Grab	
Nitrogen, Ammonia (NH3-N) Total	Daily Max	14 mg/L	Weekly	Grab	
Nitrogen, Ammonia (NH3-N) Total	Monthly Avg	14 mg/L	Weekly	Grab	
Phosphorus, Total	Monthly Avg	9.0 mg/L	3/Week	Grab	Limit effective throughout the permit term, as it represents a minimum control level. ~~This is an interim MDV limit effective through August 30, 2027. See the MDV/Phosphorus sections and phosphorus schedules.~~
~~Phosphorus, Total~~	~~Monthly Avg~~	~~1.0 mg/L~~	~~Weekly~~	~~Grab~~	~~This is an interim MDV limit effective on September 1, 2027. See the MDV/Phosphorus sections and phosphorus schedules.~~
Phosphorus, Total		lbs/day	3/Week	Calculated	Report daily mass discharged using Equation 1a. in the Water Quality Trading (WQT) section.
WQT Credits Used (TP)		lbs/month	Monthly	Calculated	Report WQT TP Credits used per month using Equation 2c. in the Water Quality Trading (WQT) section. Available TP Credits are specified in Table 2 and in the approved Water Quality Trading Plan.
WQT Computed	Monthly Avg	0.225 mg/L	Monthly	Calculated	Report the WQT TP Computed Compliance

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Compliance (TP)					value using Equation 4a. in the Water Quality Trading (WQT) section. Value entered on the last day of the month.
WQT Computed Compliance (TP)	6-Month Avg	0.075 mg/L	Monthly	Calculated	Compliance with the six-month average limit is evaluated at the end of the six-month period on June 30 and Dec 31.
WQT Computed Compliance (TP)	6-Month Avg	0.003 lbs/day	Monthly	Calculated	Report the WQT TP Computed Compliance value using Equation 4b. in the Water Quality Trading (WQT) section. Compliance with the six-month average limit is evaluated at the end of the six-month period on June 30 and Dec 31.
WQT Credits Used (TP)	Annual Total	137.7 lbs/year	Annual	Calculated	Limit effective for 2026 only. The sum of total monthly credits used may not exceed Table 2 values listed.
WQT Credits Used (TP)	Annual Total	236 lbs/year	Annual	Calculated	Limit effective beginning in 2027. The sum of total monthly credits used may not exceed Table 2 values listed.
Phosphorus, Total		lbs/month	Monthly	Calculated	Report the total monthly phosphorus discharged in lbs/month on the last day of the month on the DMR. See Standard Requirements for 'Appropriate Formulas' to calculate the Total Monthly Discharge in lbs/month.
Phosphorus, Total		lbs/yr	Annual	Calculated	Report the sum of the total monthly discharges (for the months that the MDV is in effect) for the calendar year on the Annual report form.

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Chloride		mg/L	4/Month	Grab	Monitoring for one year upon reissuance.
Temperature		deg F	3/Week	Continuous	Monitoring for one year upon reissuance.
Acute WET		TU_a	See Listed Qtr(s)	24-Hr Flow Prop Comp	See WET section.

Changes from Previous Permit

Effluent limitations and monitoring requirements were re-evaluated for the proposed permit term and the following changes were made from the previous permit.

- **Sample Location**: Sampling previously taken at the manhole just outside the Living Machine and will continue. This permit term the permittee will complete actions per the schedules. If these actions are not completed the legal point of standards next permit term will be at the v-notch weir of the lagoon.
- **BOD, TSS, pH**: Sampling frequency was evaluated and increased.
- **TSS WQT Modification -1**: The permittee was approved for WQT for TSS compliance. The permit modification adds WQT for TSS. Sampling frequency set at 3/week, the standard sampling frequency and increased to ensure appropriate data for WQT reporting purposes.
- **Phosphorus**: The permittee has applied for a multi-discharger variance (MDV) for phosphorus for this permit term and the application has been approved by the Department. An MDV interim limit of 1.0mg/L has been added that goes into effect per a compliance schedule. The permittee is now required to report the total amount of phosphorus discharged in lbs/month and lbs/year. By March 1 of each year the permittee shall make a payment(s) to participating county(s) of $62.65 per pound of phosphorus discharged during the previous year in excess of the target value of 0.2 mg/L. Sampling frequency was evaluated and increased.
    - **Modification** -1 removes the MDV requirements starting 9/1/2026 with the exception of one final payment for the months the MDV was in effect in 2026. Sampling frequency set at 3/week, the standard sampling frequency and increased to ensure appropriate data for WQT reporting purposes.
- **Dissolved oxygen**: Sampling and limits added. Sampling frequency was evaluated and increased.
- **Chloride**: Sampling time period changed.
- **Temperature**: Sampling time period changed and sample type changes to 'continuous' per request of permittee.
- **WET**: testing updated and/or added.

Explanation of Limits and Monitoring Requirements

Refer to the Water Quality Based Effluent Limitations (WQBELs) memo for Cedar Grove Cheese Factory, prepared by Sarah Luck dated December 20, 2021 and Technology Based Effluent Limitations (TBELs) dated December 23, 2021 used for this reissuance.

Monitoring Frequencies: Taking into consideration guidance and requirements in administrative code, effluent monitoring frequencies for Cedar Grove's permit were determined to be below appropriate frequencies. The department evaluated the past data for variability, last five years of operations, violations of daily maximum and monthly average limits, industry type and size, along with considerations for the move of the sampling outfall and determined that weekly

sample frequency is needed. At this time, the department has determined it is appropriate to increase sampling for BOD, TSS, pH, DO, Ammonia, and Phosphorus to weekly. If after completing the schedule, the permittee feels that the data indicated low variability in effluent quality they may request the department reevaluate sampling frequency. Any change in frequency required a permit modification with public notice.

INDUSTRIAL EFFLUENT LIMITS: In accordance with the federal regulation 40 CFR 122.45(d), limits in this permit are to be expressed as daily maximum and monthly average limits whenever practicable.

PFOS and PFOA: NR 106 Subchapter VIII – Permit Requirements for PFOS and PFOA Dischargers became effective on August 1, 2022. Pursuant to s. NR 106.98(3)(b), Wis. Adm. Code, the department evaluated the need for PFOS and PFOA monitoring taking into consideration the presence of potential PFOS or PFOA industrial wastes, remediation sites and other potential sources of PFOS or PFOA. Based on information available at the time the proposed permit was drafted, the department has determined the permittee does not need to sample for PFOS or PFOA as part of this permit reissuance. The department may re-evaluate the need for sampling at the next permit reissuance if new information becomes available that suggests PFOS or PFOA may be present in the discharge.

BOD, Total Suspended Solids, and pH: Standard ch. NR 240, Wis. Adm. Code wastewater requirements for TSS, and pH are included. The immediate receiving water is a Limited Aquatic Life (LAL) community therefore per S. NR 104.02(3)(b), Wis. Adm. Code, BOD and TSS concentration limits are warranted. However, the department has determined that a code change may be required and for permittees in similar situations to Cedar Grove has put the permittee on notice that the LAL BOD and TSS concentration limits are likely to become effective next permit term. A short compliance schedule of one to two years may be provided next permit term. Since it is unclear if the permittee can meet the BOD and TSS concentration limits without changes in operations, the department suggests the permittee remain in close communication regarding the status of BOD and TSS concentration limits in the future. Production levels have not changed. The categorical limits remain the same for Cedar Grove Cheese for BOD and TSS, (i.e. 9.2 lbs/day daily mas and 4.6 lbs/day monthly avg.) based on raw milk processed. Based on a review sample frequency is increased to weekly.

Phosphorus: Phosphorus rules became effective December 1, 2010 per NR 217, Wis. Adm. Code, that required the permittee to comply with water quality based effluent limits (WQBELs) for total phosphorous. The final phosphorus WQBELs are 0.225 mg/L monthly average and 0.075 mg/L and 0.003 lbs/day six-month average and were to become effective as scheduled unless a variance was granted. For this permit term, the permittee has applied for the Multi-Discharger Variance (MDV) for phosphorus as provided for in s. 283.16, Wis. Stats., and approved by USEPA on February 6, 2017 until February 5, 2027 until September 30, 2026. Effective October 1, 2026 the MDV is no longer approved and WQT requirements for TP compliance becomes effective. ~~The permittee qualifies for the MDV because it is an existing source and a major facility upgrade is needed to comply with the applicable phosphorus WQBELs, thereby creating a financial burden. The effluent limit upon reissuance for total phosphorus is 9 mg/L as an average monthly limit. The limit was derived using DMR data from January 2017 to June 2021.~~

~~Conditions of the MDV require the permittee to optimize phosphorus removal throughout the proposed permit term, comply with interim limits and make annual payments to participating county(s) by March 1 of each year based on the pounds of phosphorus discharged during the previous year in excess of the specified target value. A reopener clause is included in the permit to address the current MDV's expiration date, as a permit action may be required to update or remove variance provisions if the MDV is altered or unavailable after February 6, 2027.~~

~~The "price per pound" value is $62.65 adjusted for CPI annually during the first quarter as defined by s. 283.16(8)(a)2, Wis. Stats and takes effect for reissued permits with effective dates starting April 1. This may differ from the "price per pound" that is public noticed; however, the "price per pound" is set upon reissuance and is applicable for the entire permit term. The participating county(s) uses these payments to implement non-point source (agricultural and urban) phosphorus control strategies at the watershed level. Based on a review sample frequency is increased to weekly to ensure representative data due to data variability.~~

MDV requirements of this permit end 8/31/2026. One final payment remains due for the months the MDV was in effect in 2026.

Permit modification -1 ends MDV requirements on 8/31/2026 and begins requirements of Water Quality Trading starting 91/2026.

TSS and Phosphorus WQT effective 9/1/2026 with Modification -1: Requirements for reporting for TSS WQT have been added to the permit as related to the WQT Plan (WQT-2026-0016).

Phosphorus requirements are based on the Phosphorus Rules that became effective December 1, 2010 as detailed in NR 102 Water Quality Standards and NR 217 Effluent Standards and Limitations for Phosphorus. Chapter NR 217 of the Wis. Adm. Code addresses point source dischargers of phosphorus to surface waters. Currently in NR 217 Wis. Adm. Code there are two methods used to determine if a phosphorus limit is needed: a technology based effluent limit (TBEL) and a water quality based effluent limit (WQBEL). In this case, the WQBEL is 0.225 mg/L (monthly average), 0.075 mg/L & 0.003 lbs/day (6-month average). For the reasons explained in the April 30, 2012 paper entitled 'Justification for Use of Monthly, Growing Season and Annual Average Periods for Expression of WPDES Permit Limits for Phosphorus Discharges in Wisconsin', WDNR has determined that it is impracticable to express the phosphorus WQBEL for the permittee as a maximum daily, weekly or monthly value. The final effluent limit for phosphorus is expressed as a six-month average. It is also expressed as a monthly average equal to three times the derived WQBEL (which equates to 0.3 mg/L). This final effluent limit was derived from and complies with the applicable water quality criterion. A phosphorus concentration limit is necessary to prevent backsliding during the term of the permit. The current interim limit of 9.0 mg/L will be retained in the permit.

The wastewater treatment facility is not able to meet the WQBEL. This permit authorizes the use of trading as a tool to demonstrate compliance with the phosphorus WQBELs. This permit includes terms and conditions related to the Water Quality Trading Plan (WQT-2026-0016) or approved amendments thereof. The total 'WQT TP Credits' available are designated in the approved WQT Plan. The permittee is implementing perennial vegetation (agroforestry tree crops) on agricultural cultural land. The WQT Plan proposes the generation of 236 lbs/yr of phosphorus credits for the next five years.

Additional WQT subsections in the permit provide information on compliance determinations, annual reporting and re-opening of the permit.

Ammonia: Current acute and chronic ammonia toxicity criteria for the protection of aquatic life are included in Table 2C and Table 4B of ch. NR 105, Wis. Adm. Code (effective March 1, 2004). Subchapter IV of ch. NR 106 establishes procedures for calculating water quality-based effluent limitations (WQBELs) for ammonia (effective March 1, 2004). The current daily maximum and monthly average ammonia limits are retained in the proposed permit. Based on a review sample frequency is increased to weekly to ensure representative data due to data variability.

Chloride: The 1 and 4-day P99 are under the corresponding limits, therefore no effluent limitations are recommended. Monitoring for a minimum of one full year at this outfall is required to provide information needed to complete the schedule. A sampling frequency of 4/Month is four consecutive days in a month and has been found to provide the most representative data due to chloride variability in dischargers.

Temperature: Requirements for Temperature are included in NR 102 Subchapter II Water Quality Standards for Temperature and NR 106 Subchapter V Effluent Limitations for Temperature. Monitoring for a minimum of one full year as part of the schedule for compliance. Continuous sample type was requested during public notice by the permittee.

Whole Effluent Toxicity: Whole effluent toxicity (WET) testing requirements are determined in accordance with ss. NR 106.08 and NR 106.09 Wis. Adm. Code, as revised August 2016. (See the current version of the Whole Effluent Toxicity Program Guidance Document and checklist and WET information, guidance and test methods at

http://dnr.wi.gov/topic/wastewater/wet.html). Evaluation shows the need for two acute WET tests in the next permit term the quarters these tests are required are listed in the permit.

Chlorine: The WQBEL recommended effluent limitations for chlorine. However, the permittee has indicated that they do not chlorinate process water or any waters that are discharged to surface waters. The permittee completed testing for chlorine at the v-notch weir and found no chlorine present. Therefore, no limitations or monitoring is required at this time.

2 Land Application - Sludge/By-Product Solids (industrial only)

Sample Point Number: 004- EQ Tank; 005- Salt Whey Tank

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Nitrogen, Total Kjeldahl		mg/L	Monthly	Grab	
Chloride		mg/L	Monthly	Grab	
Nitrogen, Ammonium (NH4-N) Total		mg/L	Monthly	Grab	
Phosphorus, Total		mg/L	Monthly	Grab	
Potassium, Total Recoverable		mg/L	Monthly	Grab	
pH Field		su	Monthly	Grab	
BOD5, Total		mg/L	Monthly	Grab	

Changes from Previous Permit:

No changes were required.

Explanation of Limits and Monitoring Requirements

The EQ and Salt Whey tanks are liquid wastewater and are used to store different wastes. The parameters and units have been updated to reflect this pursuant to ch. NR 214, Wis. Adm. Code. Sludge is monitored in percent units to ensure representative data in wastes with varying percent solids. The Daily Log now includes the application rates and weekly loading volumes per s. NR 214.17, Wis. Adm. Code for liquid wastes. Reporting requirements for manure storage pit disposal was also added. Sampling is only required is land application occurs. In months with no land application the permittee reports no discharge on the eDMR.

Sample Point Number: 006- Living Machine Sludge Tank

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Solids, Total		Percent	Monthly	Grab	
Nitrogen, Total		Percent	Monthly	Grab	

Monitoring Requirements and Limitations					
Parameter	**Limit Type**	**Limit and Units**	**Sample Frequency**	**Sample Type**	**Notes**
Kjeldahl					
Chloride		Percent	Monthly	Grab	
pH Field		su	Monthly	Grab	
Nitrogen, Ammonium (NH4-N) Total		Percent	Monthly	Grab	
Phosphorus, Total		Percent	Monthly	Grab	
Potassium, Total Recoverable		Percent	Monthly	Grab	

Changes from Previous Permit:

No changes were required.

Explanation of Limits and Monitoring Requirements

This tank is liquid sludge from the living machine treatment plant. The previous permit categorized the land applied waste as liquid wastewater, however this waste is a sludge because it has gone through a treatment process. Standard industrial sludge sampling has been included per ch. NR 214, Wis. Adm. Code. There is no 10% exemption for discharge of industrial sludges to manure storage units. Sampling is only required is land application occurs. In months with no land application the permittee reports no discharge on the eDMR.

3 Schedules

3.1 Phosphorus Schedule - Optimization Plan

The permittee is required to optimize performance to control phosphorus discharges per the following schedule.

Required Action	Due Date
Optimization Plan: The permittee shall prepare an Optimization Plan and submit it for Department approval. The plan shall include an evaluation of collected effluent data, possible source reduction measures and operational improvements to optimize performance to control phosphorus discharges. The plan shall contain a schedule for implementation of the measures and improvements. Once the plan is approved by the Department, the permittee shall take the steps called for in the Optimization Plan and follow the schedule of implementation as approved.	09/30/2024
Progress Report #1: Submit a progress report on optimizing removal of phosphorus.	09/30/2025
Progress Report #2: Submit a progress report on optimizing removal of phosphorus.	09/30/2026
~~**Progress Report #3:** Submit a progress report on optimizing removal of phosphorus.~~	~~09/30/2027~~
~~**Progress Report #4:** Submit a progress report on optimizing removal of phosphorus.~~	~~09/30/2028~~

Explanation of Compliance Schedules

Per s. 283.16(6)(a), Wis. Stats. the Department may include a requirement that the permittee optimize the performance of a point source in controlling phosphorus discharges, which may be necessary to achieve compliance with multi-discharger

variance interim limits. This compliance schedule requires the permittee to prepare an optimization plan with a schedule for implementation and submit it for Department approval. The permittee shall take the steps called for in the optimization plan and submit annual progress reports on optimizing the removal of phosphorus.

Modification -1 removes the requirements for the optimization plan which is a requirement of the MDV that is no longer in effect after 8/31/2026.

3.2 Phosphorus Payment per Pound to County

The permittee is required to make annual payments for phosphorus reductions to the participating county or counties in accordance with s. 283.16(8), Wis. Stats, and the following schedule. The price per pound will be set at the time of permit reissuance and will apply for the duration of the permit.

Required Action	Due Date
Annual Verification of Phosphorus Payment to County: The permittee shall make a total payment to the participating county or counties approved by the Department by March 1 of each calendar year. The amount due is equal to the following: [(lbs of phosphorus discharged minus the permittee's target value) times ($62.65 per pound)] or $640,000, whichever is less. See the payment calculation steps in the Surface Water section. The permittee shall submit Form 3200-151 to the Department by March 1 of each calendar year indicating total amount remitted to the participating counties to verify that the correct payment was made. The first payment verification form is due by the specified Due Date. Note: The applicable Target Value is 0.2 mg/L as defined by s. 283.16(1)(h), Wis. Stats. The "per pound" value is $50.00 adjusted for CPI.	03/01/2024
Annual Verification of Payment #2: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2025
Annual Verification of Payment #3: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2026
Annual Verification of Payment #4: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.	03/01/2027
~~**Annual Verification of Payment #5**: Submit Form 3200-151 to the Department indicating total amount remitted to the participating counties.~~	~~03/01/2028~~
~~**Continued Coverage:** If the permittee intends to seek a renewed variance, an application for the MDV (Multi Discharger Variance) shall be submitted as part of the application for permit reissuance in accordance with s. 283.16(4)(b), Wis. Stats.~~	
~~**Annual Verification of Payment After Permit Expiration**: In the event that this permit is not reissued prior to the expiration date, the permittee shall continue to submit Form 3200-151 to the Department indicating total amount remitted to the participating counties by March 1 each year.~~	

Explanation of Compliance Schedules

Subsection 283.16(6)(b), Wis. Stats., requires permittees that have received approval for the multi-discharger variance (MDV) to implement a watershed project that is designed to reduce non-point sources of phosphorus within the HUC 8 watershed in which the permittee is located. The permittee has selected the "Payment to Counties" watershed option described in s. 283.16(8), Wis. Stats. Under this option the permittee shall make annual payment(s) to participating county(s) that are calculated based on the amount of phosphorus actually discharged during a calendar year in pounds per year less the amount of phosphorus that would have been discharged had the permittee discharged phosphorus at a target value concentration of 0.2 mg/L. The pounds of phosphorus discharged in excess of the target value is multiplied by a per

pound phosphorus charge that will equal $62.65 per pound. This schedule requires the permittee to submit Form 3200-151 to the Department indicating the total amount remitted to the participating county(s).

Permit Modification -1 ends required payments after the 3/1/2027 payment for the months in 2026 the MDV was in effect.

3.3 Phosphorus Multi-Discharger Variance Interim Limit (1.0 mg/L)

The permittee shall comply with the 1.0 mg/L MDV interim effluent limit by the end of this compliance schedule.

~~Required Action~~	~~Due Date~~
Submit Final Compliance Plan: The permittee shall submit an Engineering Report per s. NR 108.04(1), Wis. Adm. Code. The permittee may submit an abbreviated facility plan if the modifications are determined to be minor according to the Department.	09/30/2024
Submit Plans & Specifications: The permittee shall submit final construction plans to the Department for approval pursuant to s. 281.41, Wis. Stats., specifying treatment plant upgrades that must be constructed to achieve compliance with the interim phosphorus effluent limit and a schedule for completing construction of the upgrades by the 'Complete Construction' date specified below.	09/30/2025
Treatment Plant Upgrade: Upon approval of the final construction plans and schedule by the Department and pursuant to s. 281.41, Wis. Stats., the permittee shall initiate construction of the treatment plant upgrades in accordance with the approved plans and specifications.	09/30/2026
~~**Complete Construction and Achieve Compliance:** The permittee shall complete construction and achieve compliance with the phosphorus interim effluent limit of 1.0 mg/L.~~	~~09/01/2027~~

~~Explanation of Compliance Schedules~~

~~Subsection 283.16(6), Wis. Stats., establishes required interim phosphorus effluent limits that must be met for multi-discharger variance (MDV) eligibility. Subsection 283.16(6)(am), Wis. Stats., allows a technology based phosphorus limit of 1.0 mg/L as the MDV interim limit if a permittee certifies that its treatment facility cannot achieve compliance with the MDV interim limit without a major facility upgrade. The permittee qualifies for a 1.0 mg/L total phosphorus MDV interim limit and the schedule above provides the permittee to comply with that limit.~~

Modification -1 removes the requirements to meet MDV interim limits as the MDV is no longer in effect 9/1/2026.

3.4 Effluent Limits & Facility Compliance Investigation

This compliance schedule requires the permittee to complete an investigation of compliance options.

Required Action	Due Date
Report on Effluent Discharges: Submit a report to evaluate the alternatives for an upgrade or abandonment of the lagoon. This compliance schedule requires the permittee to complete an investigation of compliance options to either (1) abandon the lagoon such that sampling point 002 is the point of discharge to waters of the state or (2) upgrade the lagoon and relocate the location for compliance monitoring to the v-notch weir of the lagoon.	09/30/2024
Plans and Specifications: Submit for department review and approval an abandonment plan if the chosen compliance option is to abandon the lagoon. If the permittee chooses to upgrade the lagoon, the permittee shall submit for department review and approval plans and specifications in accordance with chs. NR 108 and NR 213, Wis. Adm. Code.	09/30/2025
Initiate Actions: The permittee shall either: (1) Commence abandonment of the lagoon as outlined in the approved abandonment plan, or (2) Commence implementation of lagoon upgrades pursuant to	09/30/2026

the approved plans and specifications.	
Complete Actions: Complete all actions necessary to demonstrate compliance with the effluent concentration limitations at the legal point of discharge to waters of the state as determined by final compliance choices for the existing lagoon.	09/01/2027

Explanation of Schedules

The existing lagoon has not been in active use as part of the treatment process. This lagoon was not properly abandoned either. This schedule provides the steps necessary to take steps to ensure that the lagoon is in compliance with applicable regulations. If the permittee does not take steps to complete steps to have the lagoon officially abandoned the department will require sampling at the point of discharge to waters of the State which would be the weir at the end of the lagoon.

3.5 Annual Water Quality Trading (WQT) Report

Required Action	Due Date
Annual WQT Report: Submit an annual WQT report that shall cover the time period from 9/1/2026 through 12/31/2026. The WQT Report shall include: The number of pollutant reduction credits (lbs/month) used each month of the previous year to demonstrate compliance; The source of each month's pollutant reduction credits by identifying the approved water quality trading plan that details the source; Results of the annual inspection of each nonpoint source management practice that generated any of the pollutant reduction credits used during the previous year; and Identification of noncompliance or failure to implement any terms or conditions of this permit with respect to water quality trading that have not been reported in discharge monitoring reports.	01/31/2027
Annual WQT Report #2: Submit an annual WQT report that shall cover the previous year.	01/31/2028
Annual WQT Report Required After Permit Expiration: In the event that this permit is not reissued by the expiration date, the permittee shall continue to submit annual WQT reports by January 31 each year covering the total number of pollutant credits used, the source of the pollution reduction credits, a summary of annual inspection reports performed, and identification of noncompliance or failure to implement any terms or conditions of the approved water quality trading plan for the previous calendar year.	

Explanation of Schedules

Added with permit modification -1.
Reports are required that include the following information:

- Verification that site inspections occurred;
- Results of site inspection findings;
- Identification of noncompliance or failure to implement any terms or conditions of the permit or trading plan that have not been reported in discharge monitoring reports;
- Any applicable notices of termination or management practice registration; and
- A summary of credits used each month over the calendar year

Other Comments:

The permittee should be aware that concentration limits for BOD and TSS as listed in the WQBEL memo are likely to be required in the next permit term. The tributary to Honey Creek is considered a Limit Forage Fish waterway and as such concentration limits for BOD and TSS are applicable. However, this waterway is not currently listed in administrative code and the department has determined in situations similar to this one that notifying the permittee that these limitations are likely to be required is warranted but no schedule for compliance is required this permit term. These limits should be considered with any facility upgrades or plans during this permit term. It is likely that the BOD and TSS concentration limits would be effective within 1-2 years of the next permit reissuance pending what code changes may occur.

Attachments:

Water Quality Based Effluent Limits with map(s) – 12/20/2021

Technology Based Effluent Limits – 12/23/2021

MDV Conditional Approval Letter – 7/23/2021

MDV Application – 6/28/2021

MDV Checklist – 7/23/2021

Water Quality Trading Conditional Approval – 6/10/2026

Water Quality Trading Plan – 5/5/2026

Proposed Expiration Date:

June 30, 2028

Justification Of Any Waivers From Permit Application Requirements

No waivers

Prepared By: Jennifer Jerich, Wastewater Specialist

Date: 9/8/2022, 1/5/2023, 2/9/2023, 2/23/2023, 5/4/2023
Updated (based on fact check comments): 8/9/2023
Updated (based on public notice comments): 9/21/2023, See NFD
Modification Date: 7/17/2026

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Madison, WI 53707

Tony Evers, Governor
Karen Hyun, Ph.D., Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

6/10/2026

Robert Wills, Owner
PO Box 185
Plain, WI 53577

Subject: Cedar Grove Cheese Factory - WPDES Permit WI-0050245
Water Quality Trading Plan – CONDITIONAL APPROVAL

Dear Mr. Wills:

The Department recently received a water quality trading plan (WQT Plan) for compliance with phosphorus and TSS effluent limits at the Cedar Grove Cheese Factory. The initial plan was received in December of 2025 and an updated version was received in May of 2026. Based on WDNR review, the final WQT Plan (dated May 5, 2026) is in general conformance with the WDNR Water Quality Trading Guidance and Section 283.84 of the Wisconsin Statutes. The WQT plan proposes perennial vegetation (agroforestry tree crops) on agricultural lands. The timeline for practice installation, as set forth in the WQT plan, indicates that full field vegetation establishment occurred in May of 2026. Credits generated from approved practices result in available credit quantities shown in Table 1. These credits will be incorporated into the draft WPDES permit, used to demonstrate compliance with final phosphorus and TSS water quality-based effluent limits.

Please note that this WQT plan approval is not to be construed as approval to commence work regulated under other state or local authorities, such as Chapter 30 waterways and wetlands permitting, floodplain, or construction activities.

Table 1: Total Phosphorus Credits Available per WQT-2026-0016

Year	Available Phosphorus Credits (lbs/yr)	Available TSS Credits (tons/yr)
2026	137.7	16.71
2027	236	28.65
2028	236	28.65
2029	236	28.65
2030	236	28.65
2031	236	28.65
2032	236	28.65
2033	236	28.65

The Department conditionally approves the WQT Plan as a basis for water quality trading during the next WPDES permit term. The Department has assigned the WQT plan a tracking number of WQT-2026-0016 and

will be referenced as such in the draft WPDES permit. The final WQT plan will be included as part of the public notice package for permit reissuance. The draft WPDES permit will include a requirement for an annual trading report and effluent monitoring for total phosphorus.

If you have any questions or comments, please contact me at (608) 400-5596 or at matthew.claucherty@wisconsin.gov.

Thank You,

Matt Claucherty
Phosphorus Implementation Corodinator
Wisconsin Department of Natural Resources

e-CC:

Bryan Gatzke, The Probst Group
Tanner Connors, WDNR

The Probst Group

Technology-Driven Wastewater Solutions.
Your Partner. Today and Tomorrow.

WATER QUALITY TRADING PLAN

CREATED FOR

Cedar Grove Cheese
Plain, WI
WPDES Permit WI-0050245-10-0
May 5, 2026

ENGINEER • DESIGN • BUILD • OPERATE • CONSULT

Appendices

A – Notice of Intent (NOI) to Conduct Water Quality Trading
B – Trade Agreement
C – Watershed, Subwatershed, and Field Maps
D – Management Data from Agricultural Fields
E – SnapPlus Modeling: Historic Practices
F – SnapPlus Modeling: Permanent Vegetative Cover
G – Practice Registration Form 3400-207

1 INTRODUCTION

This water quality trading plan summarizes the plan for Cedar Grove Cheese (Cedar Grove) in Plain, WI to use water quality trading to comply with phosphorus discharge limits in its Wisconsin Discharge Elimination System (WPDES) permit for Outfall 002. To assist in complying with Cedar Grove phosphorus and total suspended solids (TSS) discharge limits, Cedar Grove has contracted with Second Story Farms LLC (Second Story), who are to install and maintain an agroforestry project with continuous vegetation on previously farmed fields (Fields L13-L22) within the same subwatershed as Outfall 002 on property owned by David and Faith Michael. These fields have previously received manure applications. These manure applications will cease once the fields are converted and used for credit generation. The fields will be planted with a mix of shrubs and trees in Fall of 2025 and remain continuously vegetated and non-fertilized for at least the next five years. Phosphorus fertilization may resume once the agroforestry crops near harvest maturity, however at a much lower rate than previously applied. This application rate will be based on soil tests and modeled in the updated WQT plan when required.

Cedar Grove has used SnapPlus modeling to quantify the amount of potentially tradable phosphorus from the fields assuming the previous farming practices continued, and then the amount after installation and maintenance of the permanent vegetative cover. Using a credit ratio of 1.2:1, this plan will calculate the phosphorus water quality credits available per year based on the change in management practice from farming in corn and soybean rotation to permanent vegetative cover at the four agricultural fields. Cedar Grove will use water quality trading to demonstrate compliance with its total phosphorus limit in its reissued WPDES permit.

2 BACKGROUND

2.1 PURPOSE FOR WATER QUALITY TRADE

The purpose of this Water Quality Trading Plan ("Plan") is to describe Cedar Grove's use of water quality trading to assist in complying with the Total Phosphorus (TP) and Total Suspended Solids (TSS) limits on Outfall 002 of WPDES permit WI-0050245-10-0. This Plan was developed pursuant to Section 3.1 of the WPDES permit. Cedar Grove will trade with Second Story on property owned by David and Faith Michael in the same HUC-12 subwatershed as Outfall 002. These fields will be placed into agroforestry mixed with continuous vegetation and Cedar Grove will use the phosphorus and TSS credits generated from this management practice to comply with the TP and TSS limits in their WPDES permit. Cedar Grove has entered into a written water quality trading agreement through 2030 with Second Story; the agreement is provided in Appendix B.

With an average flow rate of 5,795 gallons/day, TP mass limit of 0.003 lbs/day, and the facility's daily average TP mass of .34 lb/day (based on data from January 2021-July 2025) Cedar Grove would require 123.005 lbs TP/yr to comply with their mass limits. While Cedar Grove is able to meet their 4.6 lbs/day monthly TSS mass average limit, they are not able to meet their 20 mg/L monthly TSS concentration average limit. Using the same average flow rate of 5,795 gallons/day, Cedar Grove's effective mass limit at 20 mg/L is 0.97 lbs/day. Subtracting that from the facility's historical monthly average of 4.5 lbs/day, Cedar Grove will require 3.53 lbs/day or 1,288.45 lbs/year of TSS credits, thus Cedar Grove is pursuing TSS credits in order to account for any TSS concentration based WQBEL exceedances. Cedar Grove also will be able to control the effluent phosphorus concentration of their process wastewater via chemical addition to ensure final compliance with the permitted phosphorus limits and the available annual trade credits discussed further in Table 5 of Section 5.

This Plan and the Water Quality Trade Agreement with Second Story were developed pursuant to the Notice of Intent (NOI) to Conduct a Water Quality Trade. An NOI to Conduct Water Quality Trading is included as Appendix A.

2.2 WASTEWATER TREATMENT PLANT OVERVIEW

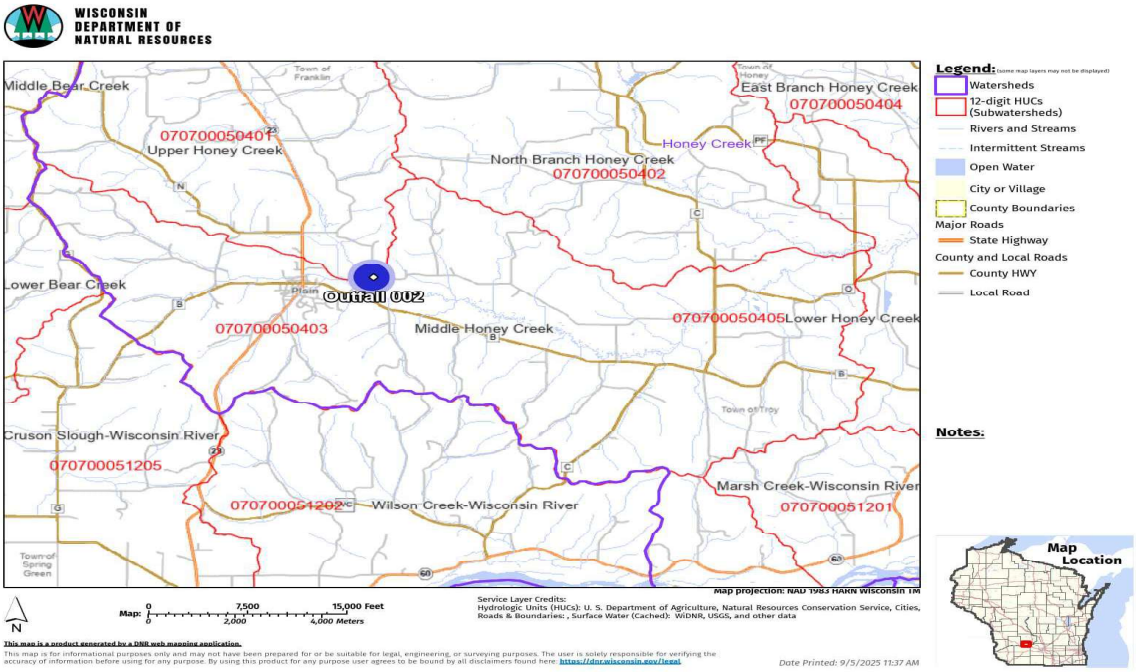
The wastewater treatment system consists of a 6000-gallon equalization tank which sends wastewater through an aerobic treatment plant. The aerobic wastewater treatment plant (Living Machine) is a series of ten tanks containing a mixture of aquatic plants and microorganisms that feed on organic materials in the wastewater. Treated wastewater from the living machine is discharged to a pond and then an unnamed tributary to Honey Creek at Outfall 002. Solids removed from aerobic treatment process are sent to storage and are ultimately hauled offsite for land application or other methods of disposal.

2.3 LOCATION OF OUTFALL AND FIELDS

2.3.1 LOCATION OF OUTFALL 002

Cedar Grove discharges treated process wastewater to the Honey Creek through Outfall 002 at an approximate latitude of 43.280676°N and longitude of 90.024391°W. Outfall 002 is located in HUC12 Subwatershed 070700050403, which is also known as the Middle Honey Creek Subwatershed. The Middle Honey Creek Subwatershed is part of the larger Honey Creek Watershed (0707000504) in the Lower Wisconsin River Subbasin (07070005). The Middle Honey Creek Subwatershed is not subject to a total maximum daily load (TMDL) and is not upstream of a watershed subject to a TMDL. Figure 1 below depicts the location of Outfall 002 in the Subwatershed. The map is also provided in Appendix C.

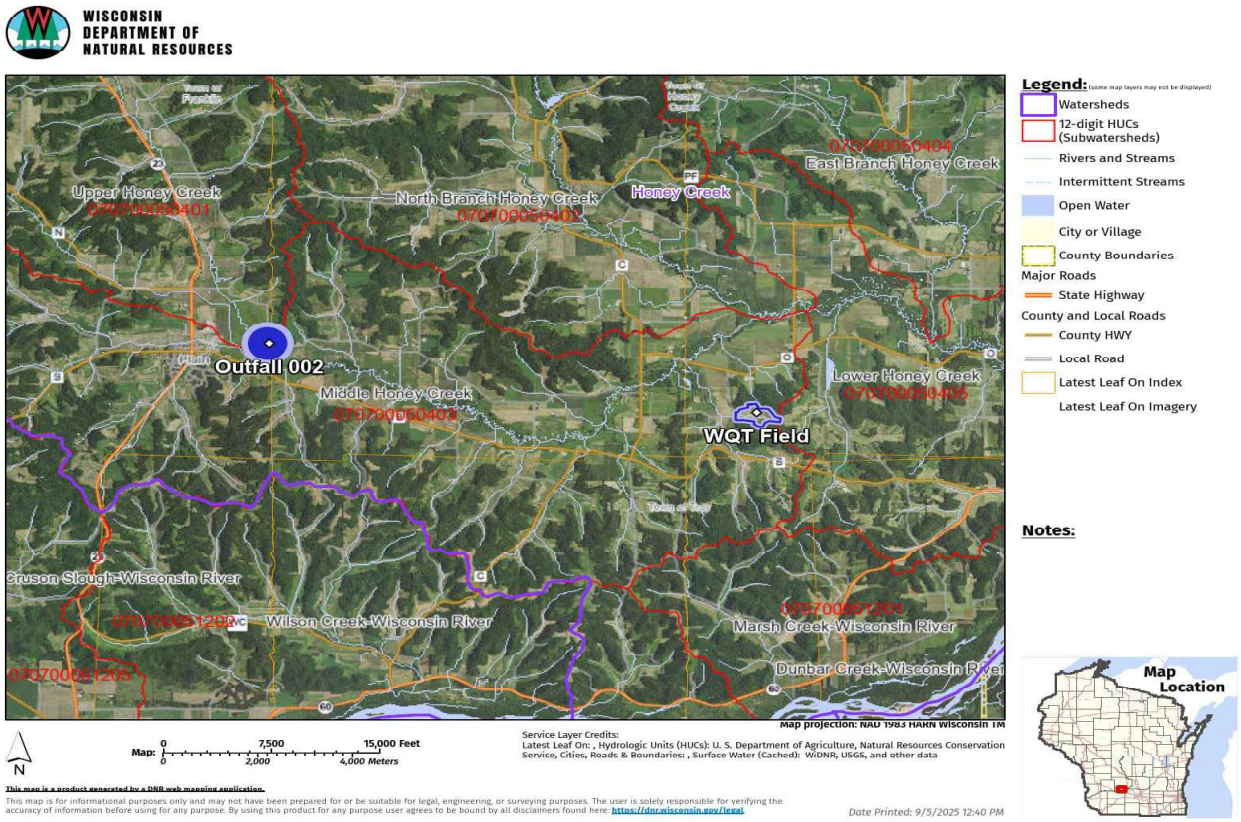
Figure 1
Outfall 002 Location



2.3.2 LOCATION OF FIELDS

Second Story will implement the management practices to generate phosphorus and TSS credits on the property of David and Faith Michael. All 66 acres of the proposed fields are downstream of Outfall 002 in the Middle Honey Creek Subwatershed. Water flows from the field to the west where a ditch channelizes the water through a culvert under School Road before flowing into Unnamed Stream 1256800. This stream flows north to Honey Creek. A map is included in Appendix C which includes the location of the fields in relation to Outfall 002.

Figure 2
WQT Fields in Relation to Outfall 002



The fields are located within the Town of Troy (Sauk County, WI) and include parcels 036.0650.0000, 036.0663.00000, 036.0784.00000, and 036.0769.0000. These parcels are located in Sections 9,10, 15, and 16 of TWP 09N R 05. A map of these parcels is included in Appendix C.

3 PREVIOUS CONDITIONS AND CURRENT TRADEABLE PHOSPHOROUS AND TSS MODELING

3.1 PREVIOUS LAND USE OF THE FIELDS

Table 1 below displays the acreage farmed on each field owned by David and Faith Michael. The entirety of the listed fields are being converted to generate credits for this WQT. The map below displays the former agricultural field boundaries.

Figure 3
Agricultural Field Boundaries

Table 1

Field Name	Acreage
L13	4
L14	7
L15	5
L16	6
L17	6
L18	24
L19	4
L20	5
L21	3
L22	2
Total Acres	66

3.2 SOIL SAMPLING

Soil samples from all 10 fields were taken on November 18, 2021 in accordance with Wisconsin's A2809 guidelines using the conventional, 5-acre grid sampling method. NRCS soils maps of the fields are included in Appendix C and soil sample results are given in Appendix D. The sample results were used to calculate the current and future potentially tradeable phosphorus for the water quality trade. Results of the SnapPlus reports using these site-specific soil conditions can be found in Appendices E and F.

3.3 MODELED PTP AND PTTSS UNDER PREVIOUS CONDITIONS

SnapPlus V2 (version 20.4.21154.1547) was used to model the fields under historic conditions, prior to implementation of the WQT. These cropping rotations were used as the basis for the initial water quality trade calculations. The fields have been managed in a five-year rotation of corn silage and alfalfa. Historic manure application rates for the fields are included in Appendix E.

As with the crop rotation, the historic fertilizer and manure applications were used in the initial water quality trade calculations, which modeled cropping and nutrient applications from 2019-2023. This Plan uses the same data to model cropping rotations and nutrient applications from 2024-2028 (the length of the water quality trading agreement).

Appendix D includes Natural Resources Conservation Service (NRCS) CropScape maps to confirm the stated cropping practices. This cropping and application data was modeled as a five-year rotation through the year 2028.

Appendix E includes the following SnapPlus reports assuming historic cropping practices were continued into the future:

- Narrative and Crop Report
- Application Summary Report
- Fields Data and 590 Assessment Plan
- P Trade Report

Table 2 summarizes the Potentially Tradeable Phosphorus (PTP) from the SnapPlus P Trade Report using the current crop and application rotation.

Table 2
SnapPlus Potentially Tradeable Phosphorus – Historic Cropping Rotation (lbs)

Field	2026	2027	2028	2029	2030
L13	6	19	18	11	8
L14	40	91	92	51	29
L15	29	44	26	18	11
L16	48	101	101	66	37
L17	23	43	20	13	8
L18	152	150	148	146	144
L19	6	8	6	7	5
L20	37	81	44	36	26
L21	6	12	8	5	4
L22	15	21	12	7	4
Total	**361**	**569**	**475**	**360**	**276**

Table 3 summarizes the Potentially Tradeable Total Suspended Solids (PTTSS) from the SnapPlus PTTSS Trade report using the current crop and application rotation

Table 3
SnapPlus Potentially Tradeable TSS – Historic Cropping Rotation (tons)

Field	2026	2027	2028	2029	2030
L13	0.4	3.4	2.3	1.3	0.7
L14	4.2	9.6	9.8	7.7	3.6
L15	3.5	6.8	2.8	1.7	1.0
L16	5.4	12.3	12.4	9.1	3.5
L17	3.9	7.5	3.2	1.9	1.1
L18	16.2	16.2	16.2	16.2	16.2
L19	0.5	1.3	0.6	0.8	0.5
L20	2.9	6.8	3.5	3.	2.3
L21	0.5	1.2	0.8	0.8	0.5
L22	2.8	5.6	2.2	1.3	0.8
Total	**40.4**	**70.7**	**53.8**	**44.5**	**30.1**

3.4 MODELED PTP AND PTTSS WITH HARVESTED GRASS HAY CROP-AGROFORESTRY IMPLEMENTATION

The fields were then modeled by replacing the historic crop rotation prior to implementation of the WQT with a no-till, non-fertilized, harvested grass hay crop. As the agroforestry installation will include continuous non-fertilized grass understory maintained between the plantings, grass hay modeling is the most accurate prediction of future PTP and PTTSS for the WQT Field. A map of the agroforestry cropping is included in Appendix C. The same SnapPlus reports that were done for the current crop rotation are available for WQT rotation in Appendix F. Table 4 below summarizes the PTP given in the SnapPlus P Trade Report for future conditions with the grass hay crop.

Table 4
SnapPlus Potentially Tradeable Phosphorus – Grass Hay (lbs)

FIELD	2026	2027	2028	2029	2030
L13	3	2	2	2	2
L14	5	1	0	0	0
L15	4	2	2	2	2
L16	13	6	5	4	4
L17	2	1	1	1	1
L18	42	10	8	6	6
L19	1	0	0	0	0
L20	7	2	2	1	1
L21	1	0	0	0	0
L22	1	0	0	0	0
Total	**78**	**25**	**19**	**17**	**16**

*Note – the columns do not add up due to SnapPlus expressing PTP in whole numbers only

Since the grower that previously managed the fields applies manure and other nutrients based off of an approved Nutrient Management Plan (NMP), manure application rates in other fields will not increase due to the reduction of total acreage available for manure application.

Table 5 summarizes the PTTSS from the SnapPlus PTTSS Trade report using the agroforestry crop and application rotation

Table 5
SnapPlus Potentially Tradeable TSS – Grass Hay (tons)

FIELD	2026	2027	2028	2029	2030
L13	0.2	0	0	0	0
L14	0.9	0.1	0	0	0
L15	0.2	0	0	0	0
L16	1.0	0.1	0	0	0
L17	0.2	0	0	0	0
L18	5.1	0.4	0.1	0.1	0
L19	0.2	0	0	0	0
L20	0.6	0	0	0	0
L21	0.2	0	0	0	0
L22	0.2	0	0	0	0
Total	**8.7**	**0.8**	**0.3**	**0.2**	**0.1**

3.5 CALCULATION OF CHANGE IN PTP AND PTTSS BASED ON MODIFIED LAND USE

Based on the change in land use from cropped agricultural land in corn and alfalfa to a harvested non-tilled grass hay crop and agroforestry, total PTP and PTTSS was then calculated. Table 6 is a calculation of the difference of the values in Tables 2 and 4 above. Table 7 is a calculation of the difference of the values in Tables 3 and 5. This table does not incorporate the trade ratio which is discussed further in Section 4 of this report. The trade ratio must be included to determine final credits generated.

Table 6
PTP Generated by WQT Management Practices (lbs)

	2026	2027	2028	2029	2030
Historic PTP	362	570	475	360	276
WQT PTP	79	24	20	16	16
PTP Generated	**283**	**546**	**455**	**344**	**260**

Table 7
PTTSS Generated by WQT Management Practices (tons)

	2026	2027	2028	2029	2030
Historic PTTSS	40.3	70.7	53.8	43.8	30.2
WQT PTTSS	8.8	0.6	0.1	0.1	0
PTTSS Generated	**31.5**	**70.1**	**53.7**	**43.7**	**30.2**

3.5.1 TRADE RATIO CALCULATION

The PTP and PTTSS generated by the SnapPlus modeling is adjusted by the applicable trade ratio to determine the amount of credits the credit user can receive for the management practice. As described in WDNR's "Guidance for Implementing Water Quality Trading in WPDES Permits" dated June 1, 2020 ("WQT Guidance"), the trade ratio is the sum of the delivery, downstream, equivalency, and uncertainty factors less any habitat adjustment factor. The trade ratio can be summarized as:

Trade Ratio = (Delivery + Downstream + Equivalency + Uncertainty):1

Per Section 3.4 of the WQT Guidance Document. For trades between point sources and nonpoint sources, there is a minimum trade ratio of 1.2:1.

As described in further detail by trade ratio factor below, Cedar Grove's management practice results in a trade ratio of 1.6:1.

3.6 INDIVIDUAL TRADE RATIO FACTORS

3.6.1 DELIVERY FACTOR

As discussed earlier, the fields subject to the permanent vegetative cover management practice are within the same HUC12, the Middle Honey Creek Subwatershed as Cedar Grove's Outfall 002. Because the fields are within the same HUC12 as the Outfall, the delivery factor is not needed (i.e., it is zero).

3.6.2 DOWNSTREAM FACTOR

All 66 acres of the proposed trade fields are downstream of Outfall 002 and therefore require a downstream factor. Calculation of the downstream factor was done using PRESTO-lite and Section 3.4 of the WQT Guidance. The PRESTO-lite map and associated report are included in Appendix C.

PRESTO-lite estimates the average annual nonpoint phosphorus load to be 37,079 lbs of phosphorus for the 68.4 square mile subcatchment in which Outfall 002 is located. Cedar Grove's outfall is located in the approximate center of the subcatchment, thus the total nonpoint load at the point of discharge is 18,539.5 lbs. Cedar Grove's maximum load is expected to be 124.1 lbs/year. Therefore, Cedar Grove's discharge will be .66% of the total current load at the point of discharge. Using Section 3.4 of the WQT Guidance, the 66 acres downstream of the point of discharge will have a downstream factor of 0.1.

3.6.3 EQUIVALENCY FACTOR

The permanent vegetative cover management practice on the fields will reduce phosphorus and TSS loadings to the subwatershed. Cedar Grove is using the phosphorus and TSS credits generated by the permanent vegetative cover management practice to comply with the phosphorus and TSS limits on Outfall 002. Because phosphorus and TSS reductions are being used to generate phosphorus and TSS credits, an equivalency factor is not needed (i.e., it is zero).

3.6.4 UNCERTAINTY FACTOR

The fields will be placed in permanent vegetative cover, as described in Section 6. According to Appendix H of the WQT Guidance, land in perennial vegetation that was established and is maintained consistent with NRCS Technical Standard 327 results in an uncertainty factor of 1. However, agroforestry crop systems are not currently modeled in Snap Plus, and the understory cover will not be as complete as a native prairie. Additionally, native prairies have more robust root systems. These factors have resulted in WDNR recommending an uncertainty factor of 1.5

3.7 CALCULATION OF TRADE RATIO BASED ON INDIVIDUAL FACTORS

Inserting the above factors into the WQT Guidance's trade ratio formula results in a trade ratio of 1.6:1:

Trade Ratio = (Delivery + Downstream + Equivalency + Uncertainty):1
Trade Ratio = (0 + 0.1 + 0 + 1.5):1
= 1.6:1

Cedar Grove will use a 1.6:1 trade ratio for the entire 66 acres for estimating credits generated by the management practice.

4 CREDIT GENERATION CALCULATION

For each year, the credit generated from the management practice is the difference between the PTP based on SnapPlus modeling assuming the prior crop rotation was continued and the PTP based on SnapPlus modeling assuming a permanent vegetative cover is installed and maintained on the fields, divided by the credit ratio as shown in the equation below. Table 5 shows the results of this calculation for each field.

Phosphorus Credits Per Year = (PTP Assuming Crops Rotation Continued - PTP Assuming Permanent Vegetative Cover) ÷ trade ratio

Table 8
SnapPlus PTP (adjusted for trade ratio of 1.2) (lbs)

2026	2027	2028	2029	2030
176.88	341.25	284.38	215	162.5

For example, in 2026:
PTP Assuming Crop Rotation Continues: 362 lbs P/yr (from Table 2)
PTP Assuming Permanent Vegetative Cover: 79 lbs P/yr (from Table 4)
Difference: 283 lbs P/yr (Table 6)
Trade ratio: 1.6:1 (from Section 3.7)
PTP including Trade Ratio: 176.88 lbs P/yr (283/1.6)

Table 9
SnapPlus PTTSS (adjusted for trade ratio of 1.2) (tons)

2026	2027	2028	2029	2030
19.69	43.81	33.56	27.31	18.88

For example, in 2026:
PTTSS Assuming Crop Rotation Continues: 40.3 tons/yr (from Table 3)
PTTSS Assuming Permanent Vegetative Cover: 8.8 tons/yr (from Table 5)
Difference: 31.5 tons TSS/yr (Table 7)
Trade ratio: 1.6:1 (from Section 3.7)
PTTSS including Trade Ratio: 19.69 tons TSS/yr (31.5/1.6)

WDNR's "Guidance for Implementing Water Quality Trading in WPDES Permits" was updated and signed on June 18th, 2020. The updated guidance allows for the baseline conditions to be averaged based on the crop rotation used prior to the management practice change.

Cedar Grove generates water quality trade credits for TP and TSS based on conversion of historical agricultural land managed in a 5-year crop rotation of corn silage and alfalfa to agroforestry with a permanently vegetated understory. The conversion to permanent vegetation will occur in October 2025.

In order to maintain compliance with their WPDES TP and TSS limits, Cedar Grove is proposing using a rotational average of 236 lbs/year TP and 28.65 tons/year TSS (the average of PTP and PTTSS adjusted for a trade ratio for the years 2026-2030) to determine annual available credits.

5 MANAGEMENT PRACTICE DESCRIPTION

5.1 OPERATION AND MAINTENANCE PLAN

The water quality trading fields will be maintained and operated by Second Story. Beginning in October 2025, 51,000 currant and other shrubs, and 17,000 chestnuts and other trees will be planted. To maintain vegetative cover, a grass/clover seed mix will be planted. Additional seeding and overseeding may be required in Spring 2026 to ensure complete vegetative cover. The grass/clover mix will be mowed and harvested as needed for use as animal feed and to assist in nutrient removal from the fields. At no time during the duration of the water quality trade will the field receive fertilizer containing phosphorus, nor will the fields be tilled or reduced to bare ground. Additionally, livestock will not occupy the agroforestry fields, and there will not be any roads, storage structures, or other infrastructure placed in the fields.

The maximum slope in the extent of the trading fields is 20%, with a majority of the fields having a slope of less than 12%. In areas where gully erosion potential was high, grass waterways were established, along with a grass strip along the outside boundaries of the fields. As such, additional erosion control measures beyond the establishment of permanent vegetation are not anticipated to be required.

In any incident where a catastrophic event occurs that results in the removal of the permanent vegetation (extreme flooding, fire, etc.), the fields will be re-seeded as soon as possible and WDNR informed of the variation of the plan due to these events.

6 TIMELINE

TASK	TARGET COMPLETION DATE
Shrub/Tree Planting	November 2025
Grass/Clover Initial Seeding	November 2025
Grass/Clover Overseeding	April 2026
Full Field Vegetation Establishment	May 2026

7 INSPECTIONS AND REPORTING

7.1 WATER QUALITY TRADING MANAGEMENT PRACTICE REGISTRATION

Agroforestry seeding and establishment of the permanently vegetated area will begin in October 2025. A completed Registration Form 3400-207 for Water Quality Trading Management Practice Registration ("Practice Registration Form") is included in Appendix G.

7.2 MONTHLY INSPECTION, CERTIFICATION, AND REPORTING

Each month, Second Story will inspect the fields generating the phosphorus reduction credits to confirm continued cover of the permanent vegetative management practices. All high risk areas (concentrated flow paths, for example) will be observed and photographed during the inspections. Any photos taken during these inspections can be used to supplement the annual inspections described further in Section 7.3.

Each month, Cedar Grove shall also certify that the permanent vegetative cover management practice installed to generate phosphorus reduction credits is operated and maintained in a manner consistent with that specified in this Plan or a statement noting noncompliance with this Plan. A certification of compliance may be made by including the following statement as a comment on the monthly discharge monitoring report (DMR):

> I certify that to the best of my knowledge the management practice identified in the approved water quality trading plan as the source of phosphorus reduction credits is installed, established, and properly maintained.

Usage and reporting of phosphorus credits will also occur on a monthly basis and be submitted on the DMRs.

7.3 ANNUAL INSPECTIONS

Once per year, Cedar Grove's WQT consultant will inspect the fields generating the phosphorus reduction credits to confirm continuation of the permanent vegetative cover management practice and that the management practice is being appropriately maintained. The inspection will confirm compliance with the appropriate standards and verify that no sheet, rill, or gully erosion is occurring. This annual inspection shall occur between mid-August and mid-September each year and shall include at least two photographs of each of the fields; one overall site photo, and one close-up photo of a representative area of each field. The inspector will also take notes regarding plant diversity, density, overall ecological health, and any potential erosion issues.

The inspection reports will include:

- The name of the inspector.
- The inspection date.
- The relevant standards set forth in the Establishment Plan or Operation and Maintenance Plan for the growing season in which the inspection occurs and whether the fields have met the standards.
- Whether erosion concerns were identified and, if so, what those concerns are.
- When and how any identified issues with meeting standards and erosion concerns were addressed.
- When and how any identified issues with meeting standards and erosion concerns will be addressed in the future.

Inspection reports generated during each inspection will be included with the Annual Water Quality Trading Report submitted by Cedar Grove pursuant to Section 7.5 of this Plan.

7.4 NOTIFICATION OF PROBLEMS WITH COVER MANAGEMENT PRACTICE

In accordance with the Operation and Maintenance Plan, Cedar Grove will notify WDNR verbally within 24 hours of becoming aware that phosphorus reduction credits used or intended for use by Cedar Grove are not being implemented or generated as set forth in this Plan. Additionally, within five (5) days of becoming aware of noncompliance, written notification will be provided to WDNR. Both notifications will include the nature of the noncompliance, a description of how the issues will be addressed, and an appropriate timeline to address the issues. Cedar Grove shall work to rectify such problems in accordance with the Operation and Maintenance Plan.

7.5 ANNUAL WATER QUALITY TRADING REPORT

Cedar Grove shall report to WDNR by January 31 of each year the following:

- The number of phosphorus reduction credits (lbs/month) used each month of the previous year to demonstrate compliance;
- Photographs from the annual inspection, and monthly inspections if available, of the permanent vegetative cover management practice that generated the phosphorus reduction credits used during the previous years; and
- Identification of noncompliance or failure to implement any terms or conditions WPDES permit WI-0050245-10-0 with respect to water quality trading that have not been reported in discharge monitoring reports.

7.6 WDNR RIGHT TO INSPECT THE FIELDS

WDNR has the right to inspect the permanent vegetative cover management practice at any time upon giving reasonable notice to Cedar Grove to ensure the management practice is in compliance with the NRCS Technical Standard 327 and the terms of this Plan.

APPENDIX A
Notice of Intent (NOI) to Conduct Water Quality Trading

State of Wisconsin
Department of Natural Resources
101 South Webster Street
Madison WI 53707-7921
dnr.wi.gov

Notice of Intent to Conduct Water Quality Trading

Form 3400-206 (1/14)

Notice: Pursuant to s. 283.84, Wis. Stats., and ch. NR 217 Wis. Adm. Code, this form must be completed by any WPDES permittee that is using water quality trading as a method of complying with a permit limitation. Failure to complete this form would not result in penalties. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Applicant Information

Permittee Name	Permit Number	Facility Site Number
Cedar Grove Cheese	WI- 0050245-10-0	

Facility Address	City	State	ZIP Code
E5904 Mill Rd.	Plain	WI	53577

Project Contact Name (if applicable)	Address	City	State	ZIP Code
Bob Wills				

Project Name: Cedar Grove Cheese WQT

Receiving Water Name	Parameter(s) being traded	HUC 12(s)
Honey Creek	Phosphorus/TSS	070700050403

Is the permittee in a point or nonpoint source dominated watershed? (See PRESTO results - http://dnr.wi.gov/topic/surfacewater/presto.html)
- ○ Point source dominated
- ◉ Nonpoint source dominated

Credit Generator Information

Credit generator type (select all that apply):
- ☐ Permitted Discharge (non-MS4/CAFO)
- ☐ Permitted MS4
- ☐ Permitted CAFO
- ☐ Urban nonpoint source discharge
- ☒ Agricultural nonpoint source discharge
- ☐ Other - Specify: _____

Are any of the credit generators in a different HUC 12 than the applicant?
- ○ Yes; HUC 12: _____
- ◉ No
- ○ Unsure

Are any of the credit generators downstream of the applicant?
- ◉ Yes
- ○ No
- ○ Unsure

Will a broker/exchange be used to facilitate trade?
- ○ Yes; Name: _____
- ◉ No
- ○ Unsure

Point to Point Trades (Traditional Municipal / Industrial Discharge, MS4, CAFO)

Discharge Type	Permit Number	Name	Contact Address	Is the point source credit generator currently in compliance with their permit requirements?
○ Traditional ○ MS4 ○ CAFO				○ Yes ○ No ○ Unsure
○ Traditional ○ MS4 ○ CAFO				○ Yes ○ No ○ Unsure
○ Traditional ○ MS4 ○ CAFO				○ Yes ○ No ○ Unsure
○ Traditional ○ MS4 ○ CAFO				○ Yes ○ No ○ Unsure
○ Traditional ○ MS4 ○ CAFO				○ Yes ○ No ○ Unsure

Point to Nonpoint Trades (Non-permitted Agricultural, Non-Permitted Urban, etc.)

List the practices that will be used to generate credits:

Conversion of roughly 65 acres of conventional row crop agricultural fields to agroforestry. Converted field will be covered in permanent vegetation (grasses/etc.) with tree crops harvested every 15 years.

Method for quantifying credits generated:
- ☐ Monitoring
- ☒ Modeling, Names: SnapPlus
- ☐ Other: _____

Projected date credits will be available: 06/30/2025

The preparer certifies all of the following:

- I am familiar with the specifications submitted for this application, and I believe all applicable items in this checklist have been addressed.
- I have completed this document to the best of my knowledge and have not excluded pertinent information.

Signature of Preparer	Date Signed
Bryan Gatzke	5/7/2025

Authorized Representative Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. Based on my inquiry of those persons directly responsible for gathering and entering the information, the information is, to the best of my knowledge and belief, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Representative	Date Signed
Robert L Wills for Cedar Grove Cheese Inc.	5-7-2025

APPENDIX B
Trade Agreement

WATER QUALITY TRADING AGREEMENT

This WATER QUALITY TRADING AGREEMENT ("Agreement") is made and entered into this 11th day of December, 2025, by and between Cedar Grove Cheese, Inc. ("Cedar Grove" or "Buyer") and Second Story Farms, LLC ("Seller").

RECITALS

A. Cedar Grove holds a Wisconsin Pollutant Discharge Elimination System (WPDES) Permit No. WI-0050245-10-0 that permits Cedar Grove to discharge from its facility (the "Cedar Grove facility") to Honey Creek in Sauk County, and to the groundwater of Wisconsin, in accordance with the effluent limitations, monitoring requirement, and other conditions set forth in the permit (the "Cedar Grove WPDES Permit").

B. Second Story Farms, LLC is converting previously cropped farm land in Sauk County into an agroforestry project with continuous vegetation. The converted property is downstream of the Cedar Grove cheese manufacturing facility outfall in the Middle Honey Creek Subwatershed. The specific parcels and acreage to be covered by this Agreement are depicted and further described in Addendum A, attached hereto and fully incorporated by reference (the "Covered Converted Property").

C. Water quality trading ("WQT") is an alternative compliance option for WPDES permit holders, authorized by §283.84, Wis. Stats.

D. The Wisconsin Department of Natural Resources ("WDNR") issued Water Quality Trading Guidance (the "WQT Guidance") dated June 2020. The WQT Guidance has been approved by the U.S. Environmental Protection Agency ("EPA") and provides further details for trading partners to assure statutory requirements are achieved under a proposed trade.

E. The Cedar Grove WPDES permit includes phosphorus limits and Cedar Grove desires to purchase credits under the State's WQT compliance option to assist Cedar Grove in achieving compliance with its permitted limits for phosphorus.

F. Cedar Grove and Second Story Farms, LLC have been engaged in discussions over the past several months regarding the potential installation and maintenance of credit generating practices at property leased by Second Story Farms, LLC and in exchange for the consideration provided herein, Second Story Farms, LLC has agreed to convert agricultural cropland to a continuously vegetated natural hay field, per the terms defined below.

G. This Agreement certifies that certain activities are being used to meet the terms and requirements of WQT as set for by §283.84, Wis. Stats.

H. Funds exchanged as part of this Agreement shall be used for the installation and maintenance of Credit Generating Practices (as defined below) that will reduce the loading of pollutants into Honey Creek and/or its tributaries.

I. Cedar Grove wishes to use credits for the purpose of compliance with the Cedar Grove WPDES Permit and thus Cedar Grove will submit a WQT Plan and Checklist to the WDNR for review, approval, and incorporation into the Cedar Grove WPDES Permit.

J. Conservation practices and best management practices are activities performed by the Seller to reduce pollutant loadings into nearby receiving waters, hereinafter referred to as "Credit Generating Practices."

K. For purposes of this Agreement, "Annual Practices" are those Credit Generating Practices that are installed or otherwise occur on a year-to-year basis as part of a planned rotation and/or maintenance of qualifying crops.

L. Second Story Farms, LLC, on land owned by Luetscher Green Acres, operates the Seller Covered Property where Credit Generating Practices are to be performed and will be the Seller of phosphorus Credits.

M. The approximate Credit Generating Practices installation dates and the date at which all the credits become effective may be found in the Credit Certification Report.

N. Cedar Grove is purchasing some of the phosphorus and total suspended solids Credits generated pursuant to the Agreement and shall have exclusive rights to the use of up to 160 pounds of phosphorus Credits and 40 tons of total suspended solids credits annually. Second Story Farms, LLC shall retain the right to sell additional Credits generated by their management practices on the identified land.

NOW, THEREFORE, in consideration of the preceding recitals, and the consideration, obligations, covenants, and agreements set forth herein, the legal sufficiency of which the parties hereby acknowledge, Buyer and Seller agree as follows:

1. Sale of Pollutant Loading Credits. Subject to the conditions set forth in this Agreement, the Seller agrees to sell to Buyer and Buyer agrees to purchase from Seller an annual quantity of 160 pounds of Total Phosphorus ("TP") Credits and 40 tons of Total Suspended Solids (TSS) Credits. The WDNR approved Water Quality Trading Plan provides additional details. This quantity may exceed the credits required by Cedar Grove to offset its excess phosphorus in some or all years.

2. Credit Generating Practices. Buyer agrees to provide funds (defined below) to Seller in return for the following Credit Generating Practices to be performed during the term of this Agreement, which includes the installation, operation, and maintenance of the following best management practices designed to enhance water quality:

- Seller will convert the Seller Covered Property from agricultural cropland (rotating corn and alfalfa) to a continuously vegetated agroforestry project, which Seller shall harvest as needed for animal feed. Seller shall retain all rights to the harvested hay.
- Seller shall seed and maintain the Seller Covered Property as an agroforestry project with continuous vegetation.
- Seller shall not till the Seller Covered Property.
- Seller will not apply any phosphorus fertilizer to the Seller Covered Property, nor take any other actions that will cease or prevent generation of TP credits until agroforestry crops are bearing. The application rate will be based on soil tests and modeled in the updated WQT Plan when required.

3. Purchase Price. Buyer agrees to pay Seller an annual payment in the amount of $[redacted] over a term of five (5) years for a total of $[redacted] (collectively, the "Purchase Price"), representing a total of 800 TP and 200 TSS credits during the term of this Agreement.

4. Payment Terms. Payments will be made by September 30 of each year, commencing September 30, 2026 and continuing through September 30, 2030.

4.1 Buyer shall make an initial payment of $[redacted] by September 30, 2026 subject to the initial Credit Verification Report prepared by The Probst Group ("Probst") in its role as the Verifier in accordance with paragraph 5.6 below. The remaining balance shall be paid in periodic installments, subsequent to annual verification of the credit generating practices.

Remaining payments of $[redacted] shall occur in annual installations paid subject to Buyer's receipt of each annual Credit Verification Report prepared by Probst for calendar years 2027, 2028, 2029, and 2030, consistent with paragraph 5.7, below.

4.2 Should Buyer fail to make any payments consistent with paragraph 4.1, above, within fifteen (15) calendar days of the date such payment is due, then interest shall accrue at the rate of five percent (5%) per annum.

4.3 Failure of Buyer to pay Seller within thirty (30) days from the date payment is due, and after late notice of payment and failure to cure within thirty (30) days from the date of such notice, shall be considered a material breach of this Agreement, entitling Seller to terminate this Agreement and seek equitable relief along with any other appropriate relief.

5. Timing and Verification of Credit Generating Practices.

5.1 As specified in the Credit Certification Report, Credit Generating Practices shall be installed and maintained during calendar years 2025, 2026, 2027, 2028, 2029, and 2030.

5.2 As specified in the Credit Certification Report, and subject to the terms and conditions of this Agreement, credits shall be available for use between January 1, 2026, and December 31, 2030.

5.3 Initial verification of the Credit Generating Practices will be performed by a third-party Verifier that is selected by the Buyer. Performance will be measured by evaluating criteria set forth in the attached Operations and Maintenance, plus Performance Valuation Plan. Buyer is responsible for ensuring that verification of Credit Generating Practices occurs; however, Seller shall notify the Verifier by telephone in the event of a Credit Generating Practice failing or becoming otherwise damaged. Where credits are used for permit compliance, Buyer is responsible for submitting necessary documentation to the WDNR.

5.4 The Seller will perform monthly on-site inspections of the Credit Generating practices on credit generation sites and review appropriate records and documents. Verification may also include interviews with the land owner, manager, or operator.

5.5 Verification shall be conducted as least annually by the Verifier at an appropriate time of the year based on the type of Credit Generating practice(s) installed. The Parties agree to verification of the Credit Generating Practice(s) during the following months:

- Mid-August and mid-September of each year for Annual Practices (continuous vegetation and no till)

5.6 WDNR has the right to inspect the permanent vegetative cover management practice at any time upon giving reasonable notice to the Seller to ensure the management practice is in compliance with the NRCS Technical Standard 327 and the terms of this plan. Buyer shall complete an annual WQT report demonstrating compliance and submit to WDNR by January 31 of each year.

5.7 The Verifier completes and submits a management practice registration form to the Buyer within fourteen (14) days of the first installation of Credit Generating Practices.

5.8 Buyer is responsible for ensuring that the Verifier completes and submits a Credit Verification Report to the Buyer within fourteen (14) days of site visits specified in Section 5.5, above.

5.9 The terms and conditions governing the relationship between the Buyer and Verifier, and Verifier duties consistent with this Agreement, are set forth in a separate Verification Service Agreement between the Buyer and Probst. Notices to the Verifier shall be directed to:

The Probst Group

Attn: Bryan Gatzke

1120 A James Drive

Hartland, WI 53029

bgatzke@probstgroup.com

In the event the Buyer changes its Verifier, then notice shall be provided to the Seller identifying the new Verifier and providing necessary contact information within fourteen (14) days of the change.

6. Credit Terms and Conditions.

6.1 If Seller wishes to modify the type, timing, or location of Credit Generating Practices outlined in the Credit Certification Report and/or the WQT Plan prior to Credit Generating Practice installation, then Seller must provide the Buyer with the information necessary to complete and submit an updated Credit Certification Report and/or WQT Plan, as appropriate, to the WDNR. Seller shall further demonstrate to the satisfaction of the Buyer that the modification is necessary and appropriate. Buyer's approved modifications to the Credit Certification Report constitute a revision of this Agreement and shall be retained with all documents relevant to this Agreement.

6.2 If Seller wishes to modify the type, timing, or location of Credit Generating Practices outlined in the Credit Certification Report *after* Credit Generating Practice installation, Seller must provide the Buyer with the information necessary to complete and submit an updated Credit Certification Report, and associated modified WQT Plan, demonstrating to the WDNR that the modifications will result in the quantity of TP Credits agreed to in the WQT Agreement. Seller shall further demonstrate to the satisfaction of the Buyer that the modification is necessary and appropriate. Buyer's approved modifications to the Credit Certification Report constitute a revision of this Agreement and shall be retained with all documents relevant to this Agreement.

6.3 Deliberate removal or substantial alteration of a Credit Generating Practice by Seller, Seller's agents, employees, or affiliates without advance written approval of Buyer and notification to the WDNR shall constitute a material breach of this

Agreement by Seller, entitling Buyer to terminate this Agreement and seek appropriate relief.

6.4 Damage to a Credit Generating Practice due to an action or event beyond the Seller's (or Seller's agents, employees, or affliliates) control is not in and of itself considered a violation of this Agreement. If such an action occurs, the Seller, Seller's agent, or the Verifier shall report the damage(s) to the Buyer within three (3) days of discovering the damage. The Buyer is responsible to notifying WDNR when damage(s) may affect permit compliance. The Seller shall repair damaged Credit Generating Practice(s), to the maximum extent practicable, within thirty (30) days of Seller's knowledge of the damage.

6.5 Credits from Credit Generating Practices damaged due to an action or event beyond the Seller's (or Seller's agent, employees, or affiliates) control will remain valid and effective for ninety (90) days from the date of discovery or until the credits are reinstated suspended or cancelled, whichever comes sooner. Credits may be reinstated pursuant to a Credit Suspension, Reinstatement, or Cancellation Report.

6.6 If damages to Credit Generating Practices due to an action or event beyond the Seller's (or Seller's agent, employees, or affiliates) control cannot reasonably be repaired within thirty (30) days, Seller shall notify Buyer and Seller agrees to assist the Verifier, as necessary, to prepare and submit a Credit suspension or Cancellation Notice. Such notice shall be provided to the Buyer.

6.7 Damaged Credit Generating Practices that cannot be replaced through the Credit Reserve Pool for the calendar year, or are otherwise not repaired or replaced within thirty (30) days of Seller's knowledge shall constitute a material breach of this Agreement by Seller, entitling Buyer to appropriate relief.

6.8 Buyer shall not be responsible or liable for any personal injury or property damaged caused by Verifier, Seller, or Seller's Credit Generating Practices.

6.9 Buyer shall be responsible for communicating all necessary information to the WDNR. Seller shall provide credentialed WDNR staff with access to property and records related to Credit Generating Practices during reasonable hours.

7. Contract Timing and Termination

7.1 This Agreement becomes effective upon signature by both parties or their designated representatives.

7.2 This Agreement shall expire and terminate on December 31, 2030.

7.3 This Agreement may be modified or amended by mutual agreement through a written document signed by Seller and Buyer, at any time prior to the termination date of this Agreement.

7.4 In the event that the Seller fails to meet the Credit Terms and Conditions set forth in Section 6, above, then Buyer is entitled to terminate this Agreement.

7.5 This Agreement and the terms contained herein shall be binding and enforceable against the parties, their successors, and assigns for as long as the Agreement remains in effect.

7.6 If prior the end of the term of the Agreement, Buyer or Seller become the subject of a petition in bankruptcy or any proceeding related to insolvency, receivership, liquidation, or comparable proceeding or any assignment for the benefit of creditors, which is not dismissed within sixty (60) days, then the other party to this Agreement shall have the right to terminate this Agreement. In the event of termination, the non-bankrupt party shall be entitled to seek equitable relief along with other appropriate relief (e.g., status as a creditor in the bankruptcy proceeding for the monetary value of any unperformed Credit Generating Practices).

8. Seller Warranties.

8.1 Seller has the authority to enter into this Agreement and to carry out the transactions contemplated herein.

8.2 No known actions, proceedings, or investigations are pending or threatened against Seller that would interfere with Seller's ability to enter into this Agreement or carry out the agreed upon transaction.

8.3 No damage or condemnation with respect to the Seller's property or any part thereof has occurred that would interfere with Seller's ability to enter into this Agreement or carry out the obligations herein and no such condemnation is pending or threatened.

8.4 No uncured violations of any law, ordinance, order, or regulation of any governmental authority having jurisdiction over Seller's property exist that would impede the installation of Credit Generating Practices or completion of other obligations set forth in this Agreement.

8.5 Seller has not entered into any other contract or agreement that would impede the installation of Credit Generating Practices at Seller's property.

8.6 Seller agrees to install and maintain Credit Generating Practices in exchange for payment as outlined in this Agreement and as detailed in the supporting Credit Certification Report.

8.7 In the event of a sale or other transfer of property upon which Credit Generating Practices are installed, Seller shall assure that the sale includes provisions for continued compliance with this Agreement by the successor. Notice shall be provided to the Buyer not less than thirty (30) days in advance of any sale, with a copy provided to the proposed new owner. The Buyer may terminate this Agreement in whole or in part in the event of a sale or other change in Seller identity.

8.8 Seller agrees to assist the Verifier, as necessary, in preparing a Management Practice Registration form upon initial installation of Credit Generating Practices under this Agreement, as well as periodic Credit Verification Reports, as outlined in Section 5 of this Agreement.

9. Waiver. Failure of either party to enforce any term or condition of this Agreement shall not constitute a waiver of that term or condition or of any other term or condition of this Agreement.

10. Governing Law/Venue. This Agreement shall be governed under and pursuant to the laws of the State of Wisconsin. The parties further subject themselves to the exclusive jurisdiction of Sauk County, Wisconsin.

11. Contingent on Approval of WDNR. For the purposes of attaining compliance with applicable WPDES effluent limitations, the validity of the credits intended for compliance is contingent upon WDNR approval of a WQT plan.

12. Severability. If any of the provisions contained in this Agreement are held illegal, invalid, or unenforceable, such provision(s) shall be deemed severable, and the remaining provisions of this Agreement shall continue in full force and effect.

13. Entire Agreement. This Agreement constitutes the entire agreement between the parties and supersedes all prior written or oral communication.

14. Counterparts. This Agreement may be executed in two or more counterparts, each of which is deemed original, but all constitute one and the same instrument. The parties agree that a facsimile copy of a signature, including a PDF of such signature, will be deemed original and binding.

[SIGNATURE PAGE FOLLOWS]

DocuSigned by:
Kevin Wolz
51DA36D4232946B...

By: Kevin Wolz

President, Second Story Farms LLC

Date: 12/11/25

Signed by:
Robert Wills
318E267E239A451...

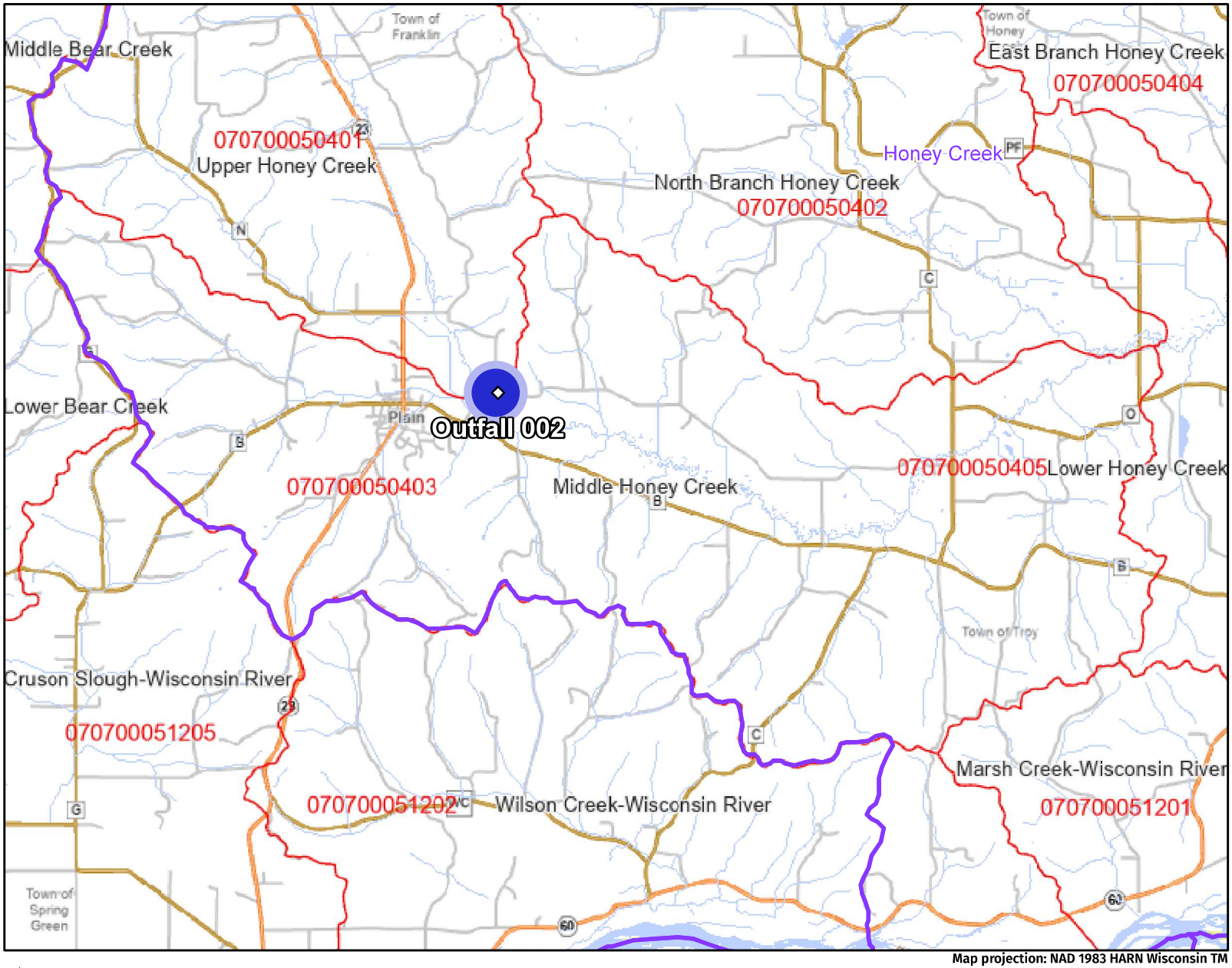
By: Bob Wills

Owner, Cedar Grove

Date: 12/11/25

APPENDIX C
Watershed, Subwatershed, and Field Maps

WISCONSIN DEPARTMENT OF NATURAL RESOURCES



Legend: (some map layers may not be displayed)

- Watersheds
- 12-digit HUCs (Subwatersheds)
- Rivers and Streams
- Intermittent Streams
- Open Water
- City or Village
- County Boundaries

Major Roads

- State Highway

County and Local Roads

- County HWY
- Local Road

Notes:

Map projection: NAD 1983 HARN Wisconsin TM

N

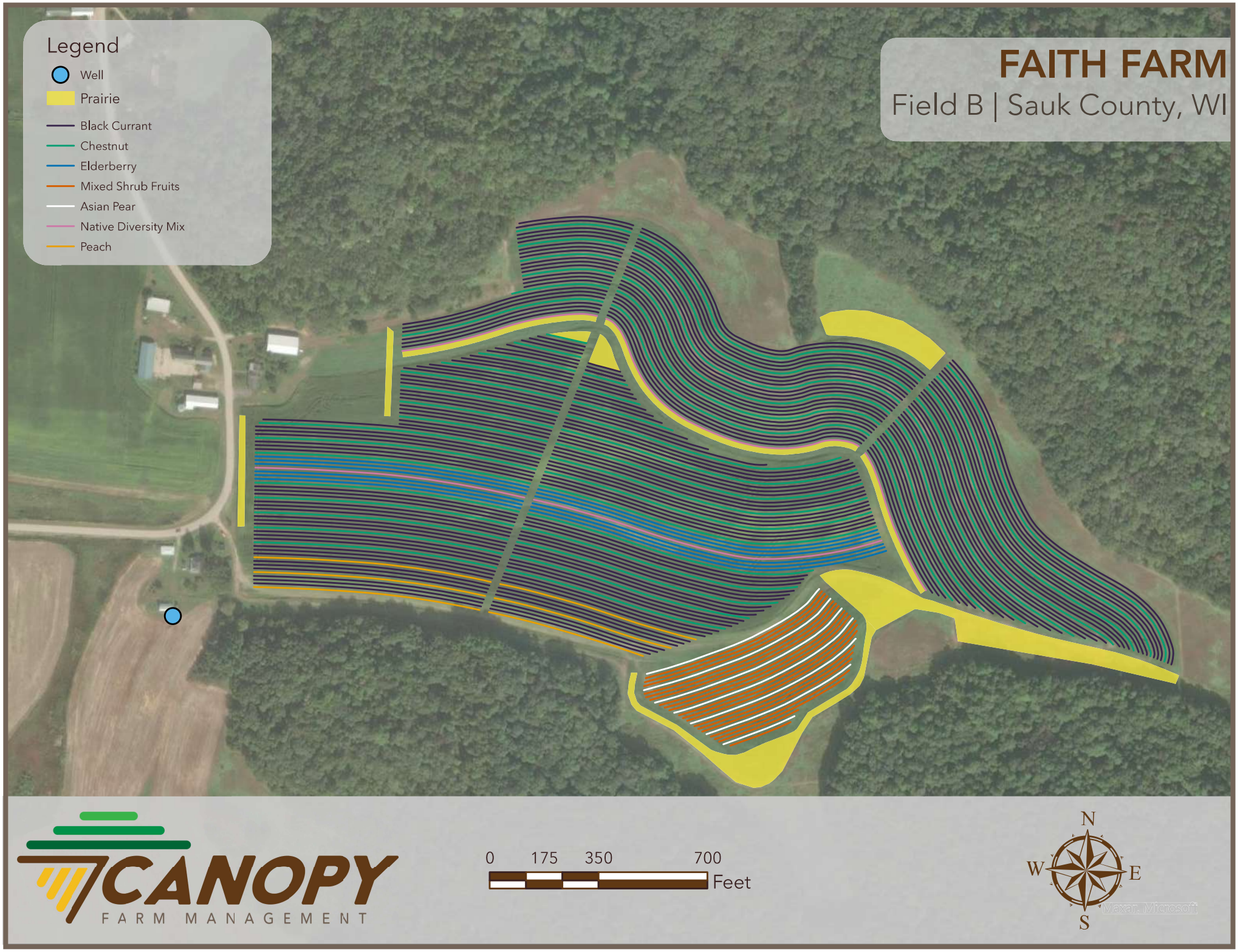
Map: 0 7,500 15,000 Feet
0 2,000 4,000 Meters

Service Layer Credits:
Hydrologic Units (HUCs): U. S. Department of Agriculture, Natural Resources Conservation Service, Cities, Roads & Boundaries: , Surface Water (Cached): WiDNR, USGS, and other data

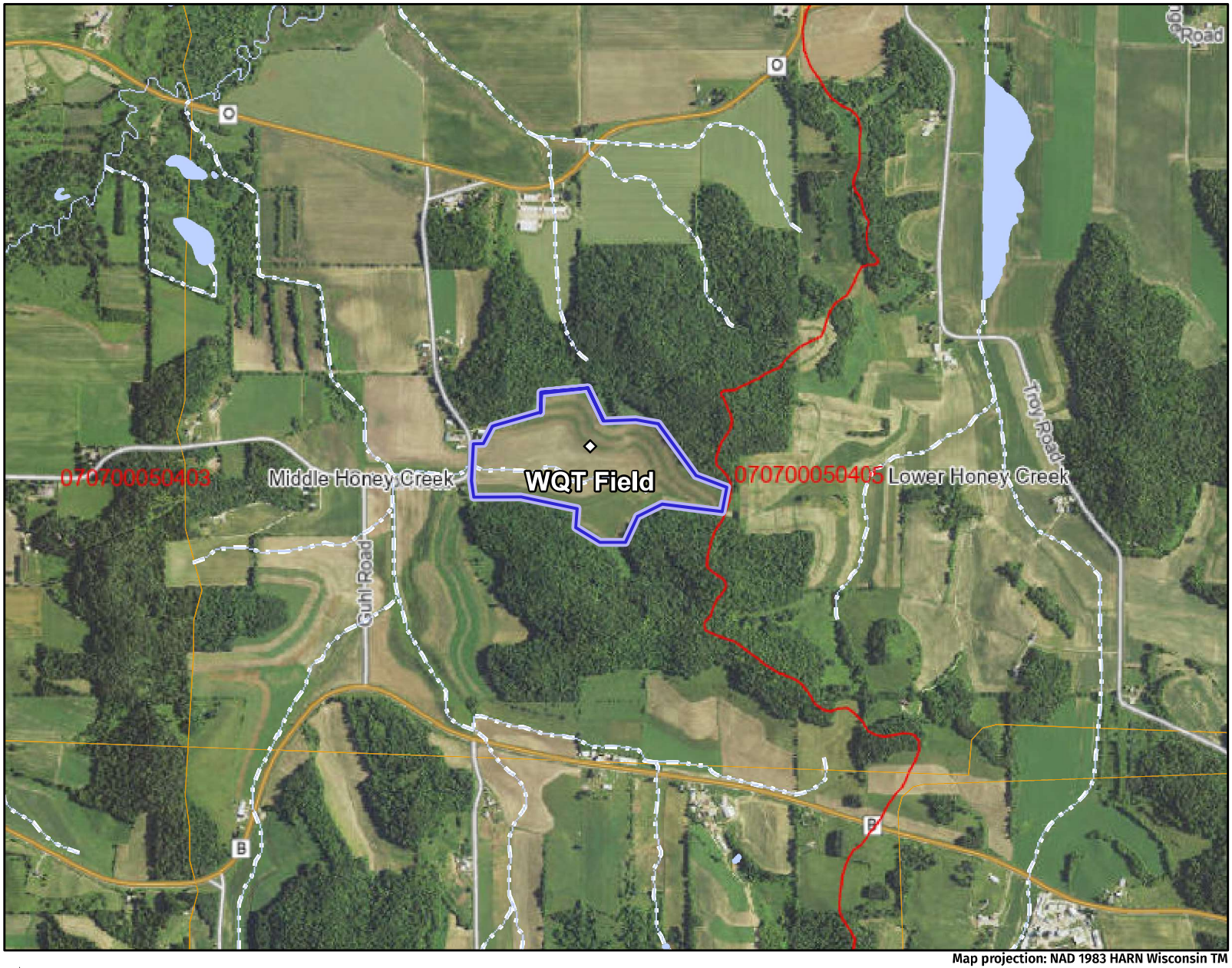
Date Printed: 9/5/2025 11:37 AM

WQT Field

Farm: Cedar Grove WQT Historical, V20 Generated:9/5/2025, Crop year: 2025, Township Range Section:9N 5E s10


Legend
Well
Prairie
Black Currant
Chestnut
Elderberry
Mixed Shrub Fruits
Asian Pear
Native Diversity Mix
Peach
FAITH FARM
Field B | Sauk County, WI
CANOPY
FARM MANAGEMENT
0
175
350
700
Feet
N
W
E
S
Maxar, Microsoft

WISCONSIN DEPARTMENT OF NATURAL RESOURCES



Legend: (some map layers may not be displayed)

- Watersheds
- 12-digit HUCs (Subwatersheds)
- Rivers and Streams
- Intermittent Streams
- Open Water
- 24K Intermittent Streams
- 24K Lakes and Open Water
- County Boundaries

County and Local Roads

- County HWY
- Local Road
- Latest Leaf On Index
- Latest Leaf On Imagery

Notes:

Map projection: NAD 1983 HARN Wisconsin TM

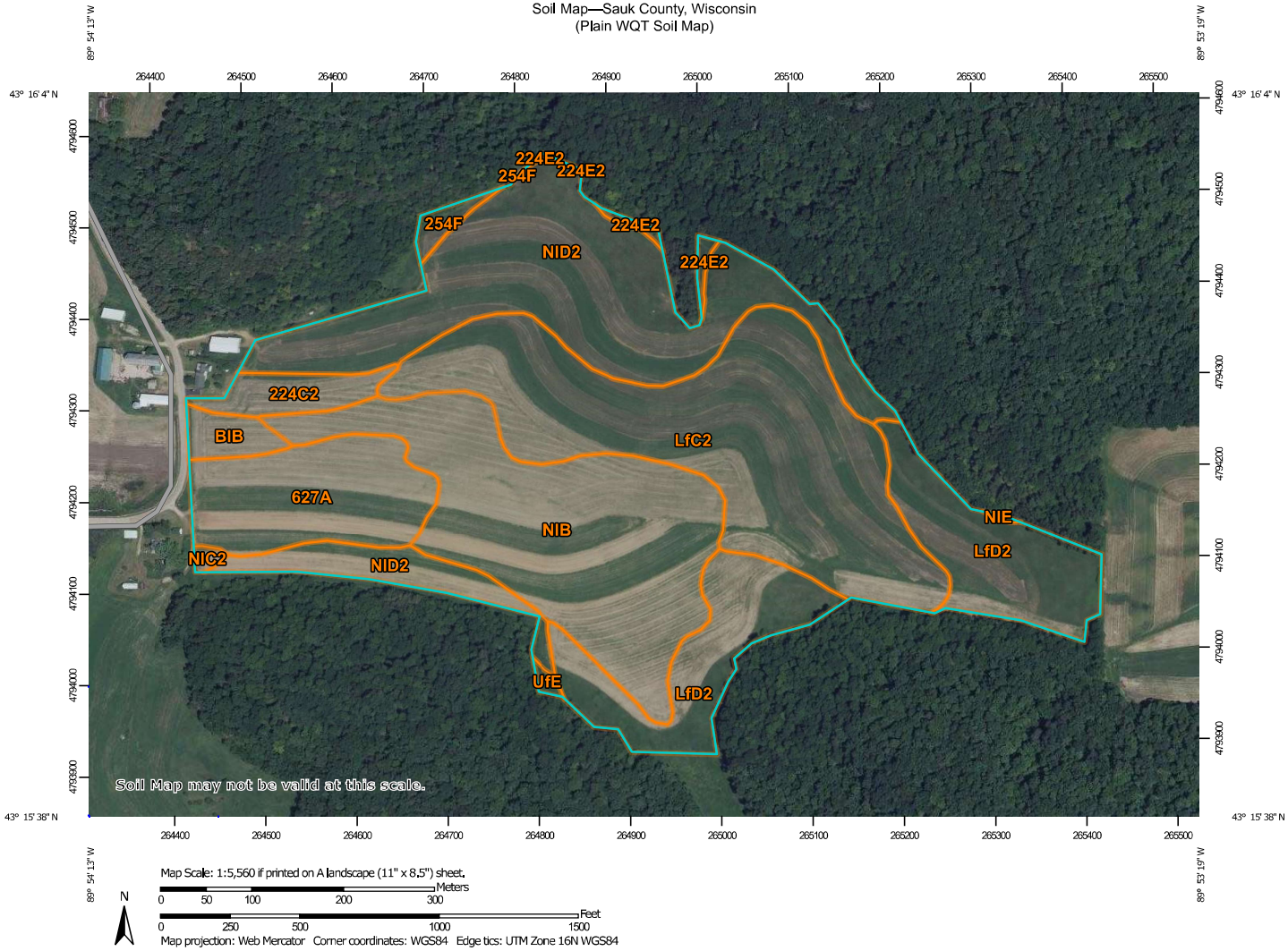
N

Map: 0 1,000 2,000 Feet
0 490 980 Meters

Service Layer Credits:
Latest Leaf On: , Hydrologic Units (HUCs): U. S. Department of Agriculture, Natural Resources Conservation Service, Cities, Roads & Boundaries: , Surface Water (Cached): WiDNR, USGS, and other data

Date Printed: 9/5/2025 12:36 PM

Soil Map—Sauk County, Wisconsin
(Plain WQT Soil Map)



Map Scale: 1:5,560 if printed on A landscape (11" x 8.5") sheet.

N

Meters
0 50 100 200 300

Feet
0 250 500 1000 1500

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 16N WGS84

MAP LEGEND

Area of Interest (AOI)
- Area of Interest (AOI)

Soils
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

Special Point Features
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

Water Features
- Streams and Canals

Transportation
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

Background
- Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:15,800.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Sauk County, Wisconsin
Survey Area Data: Version 23, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: May 13, 2020—Aug 16, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
224C2	Elevasil sandy loam, 6 to 12 percent slopes, moderately eroded	1.8	2.3%
224E2	Elevasil sandy loam, 20 to 30 percent slopes, moderately eroded	0.4	0.5%
254F	Norden silt loam, 30 to 45 percent slopes	0.5	0.6%
627A	Chaseburg silt loam, moderately well drained, 0 to 2 percent slopes	7.0	8.6%
BIB	Billett sandy loam, 1 to 6 percent slopes	1.1	1.4%
LfC2	La Farge silt loam, 6 to 12 percent slopes, eroded	21.1	25.9%
LfD2	La Farge silt loam, 12 to 20 percent slopes, eroded	12.3	15.1%
NIB	Norden loam, 2 to 6 percent slopes	17.5	21.4%
NIC2	Norden loam, 6 to 12 percent slopes, eroded	0.2	0.2%
NID2	Norden loam, 12 to 20 percent slopes, eroded	19.3	23.7%
NIE	Norden loam, 20 to 30 percent slopes	0.0	0.0%
UfE	Urne fine sandy loam, 20 to 30 percent slopes	0.2	0.2%
Totals for Area of Interest		**81.6**	**100.0%**

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Legend: (some map layers may not be displayed)

- Watersheds
- 12-digit HUCs (Subwatersheds)
- Rivers and Streams
- Intermittent Streams
- 24K Intermittent Streams
- 24K Streams and Rivers
- County Boundaries

County and Local Roads

- Local Road
- Latest Leaf On Index
- Latest Leaf On Imagery

Notes:

Map projection: NAD 1983 HARN Wisconsin TM

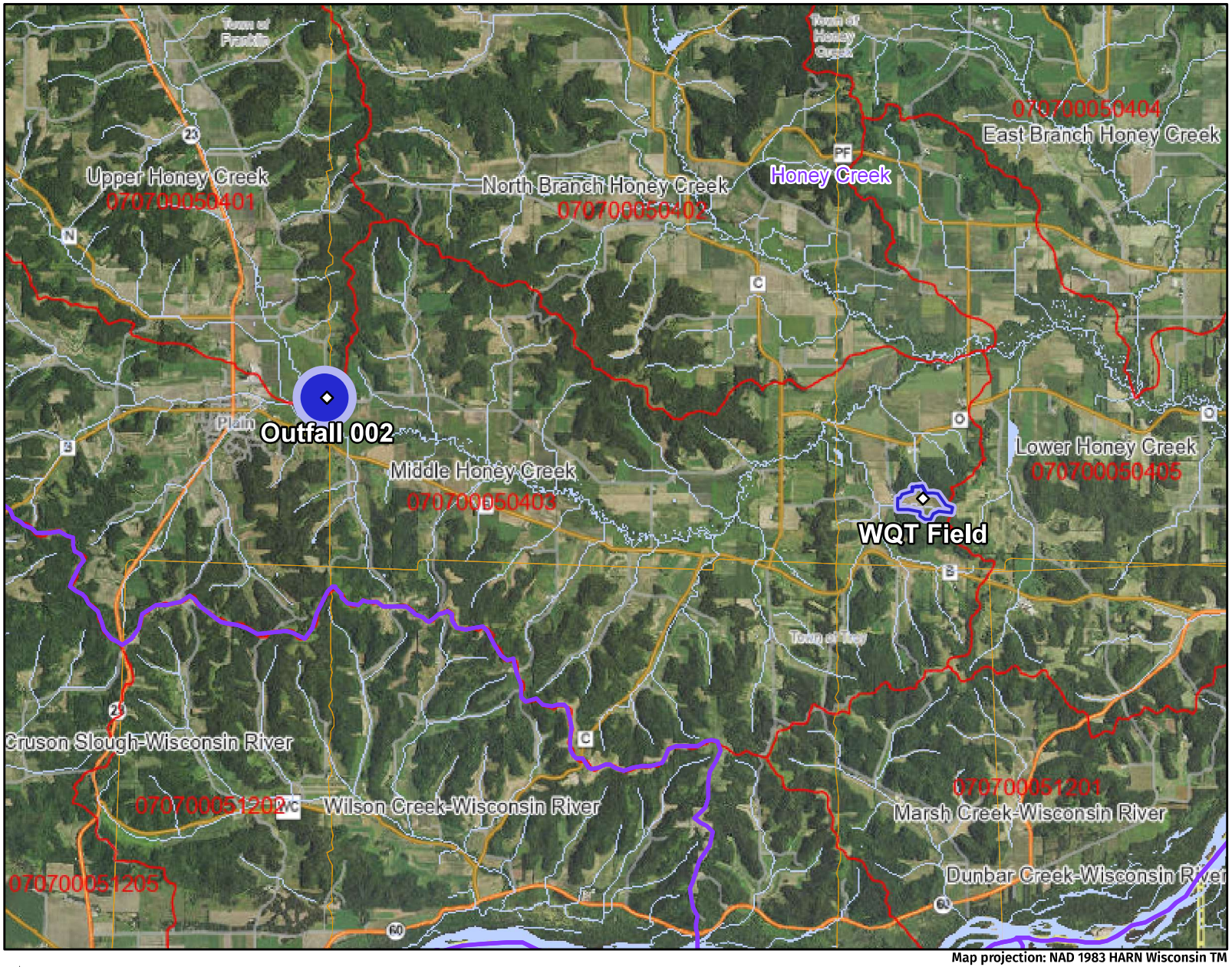
N

Map: 0 590 1,180 Feet
0 175 350 Meters

Service Layer Credits:
Latest Leaf On: , Hydrologic Units (HUCs): U. S. Department of Agriculture, Natural Resources Conservation Service, Cities, Roads & Boundaries: , Surface Water (Cached): WiDNR, USGS, and other data

Date Printed: 9/5/2025 12:37 PM

WISCONSIN DEPARTMENT OF NATURAL RESOURCES



Legend: (some map layers may not be displayed)

- Watersheds
- 12-digit HUCs (Subwatersheds)
- Rivers and Streams
- Intermittent Streams
- Open Water
- City or Village
- County Boundaries

Major Roads

- State Highway

County and Local Roads

- County HWY
- Local Road
- Latest Leaf On Index
- Latest Leaf On Imagery

Notes:

Map projection: NAD 1983 HARN Wisconsin TM

N

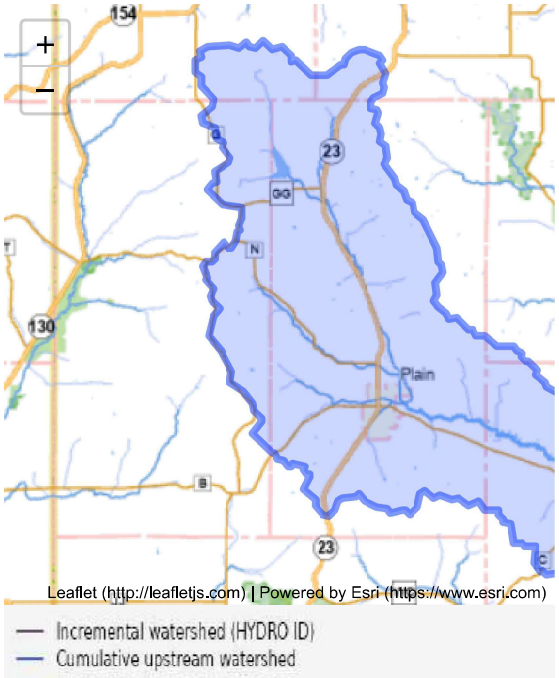
Map: 0 7,500 15,000 Feet
0 2,000 4,000 Meters

Service Layer Credits:
Latest Leaf On: , Hydrologic Units (HUCs): U. S. Department of Agriculture, Natural Resources Conservation Service, Cities, Roads & Boundaries: , Surface Water (Cached): WiDNR, USGS, and other data

Date Printed: 9/5/2025 12:40 PM

Wisconsin Department of Natural Resources

Select waterbody



Search:

Reach information

Waterbody name: Honey Creek
Waterbody type: Stream
Natural Community: Cool-Warm Mainstem
Watershed size (sq mi; sq km): 68.4; 177
HYDROID: 200034000
HUC12: 070700050403
HUC12 Name: Middle Honey Creek
HUC6 Name: Wisconsin
High-Quality Water: Yes
Ecoregion: Driftless Area
Sinuosity (m/m): 2
Minimum elevation (ft; m): 757.8; 231
Maximum elevation (ft; m): 759.1; 231.4
Average gradient (%): 0.02077
Stream order: 4

Intro | Watersheds | Lake Tools | Stream Tools

Streamflow | Presto

What Is Presto?

The Pollutant Load Ratio Estimation Tool (PRESTO) is a statewide GIS-based tool that compares the average annual phosphorus loads originating from point and nonpoint sources within a watershed. The comparison provides a screening tool for industrial and municipal dischargers to determine one of the conditions of eligibility for adaptive management as part of s. NR 217.18, Wisconsin Administrative Code.

PRESTO was designed to be easily modified, transparent to the end user and provide a consistent result based on readily available datasets. PRESTO performs three basic functions: watershed delineation, nonpoint source loading estimation and point source loading aggregation. The PRESTO outputs include a delineated watershed, watershed land cover composition, the estimated average annual nonpoint source and measured point source phosphorus loads (pounds per year), and the ratio of point to nonpoint phosphorus at a watershed outlet.

Presto Phosphorus Load Estimates

Avg. Annual Nonpoint Phosphorous Load (80% Confidence Interval)	37,079 (18,789 - 73,171) lbs
Number of Facilities (Individual Facility Information below)	2
Avg. Annual Point-source Phosphorous Load (2010 - 2012 total of all facilities)	998 lbs
Most Likely Point : Nonpoint Phosphorous Ratio	3% : 97%
Low Estimate Point : Nonpoint Phosphorous Ratio (Adaptive Management)	1% : 99%

Adaptive Management Results

Facilities discharging to the Honey Creek watershed:

Show 10 entries Search:

	Facility Name	Permit No.	Outfall No.	Waste Type	Receiving Water	Annual load (lbs), 2010-2012
1	PLAIN WASTEWATER TREATMENT FACILITY	0036048	001	Municipal	Unnamed	920
2	CEDAR GROVE CHEESE FACTORY	0050245	002	Industrial	Honey Creek	78

Showing 1 to 2 of 2 entries Previous 1 Next

Dam directly above: Not Present
Drainage: Not internally drained

Download Watershed Shapefile
(session/7c3c861246715b51c594817cf56dca09/download/download_watershed?w=1f875ab1760048e3a71a17932fe1f4c9)
Download Raw Data
(session/7c3c861246715b51c594817cf56dca09/download/download_raw_data?w=1f875ab1760048e3a71a17932fe1f4c9)

Watershed Analysis Limitations

This analysis relies on pre-defined catchments from the Wisconsin Hydrography Data-Plus and may not delineate from the exact location required. When assessing phosphorus loads for specific facility in support of efforts such as adaptive management, care should be taken to ensure that additional downstream point sources do not exist. For adaptive management information related to specific facilities, please reference the PRESTO website: http://dnr.wi.gov/topic/surfacewater/presto.html.

Delineation of watersheds is based on a topographic assessment and therefore do not account for modified drainage networks such as stormwater sewer systems and ditched agriculture.

If a watershed requires delineation from an exact location, the user may use the desktop version of PRESTO that requires ESRI ArcGIS. The PRESTO tool and default datasets can be downloaded at http://dnr.wi.gov/topic/surfacewater/presto.html.

Data sources for this report originate from the DNR's Wisconsin Hydrography Data-Plus value-added dataset and the point and nonpoint source loading information including in the DNR's PRESTO model.

If you have questions about the report generated from the PRESTO-Lite application please contact: dnrwaterqualitymodeling@wisconsin.gov

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APPENDIX D
Management Data from Agricultural Fields

FM6: Soil Test Report

Reported For	Cedar Grove WQT Historical
Printed	2025-12-12
Plan Completion/Update Date	2025-06-18
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\Cedar Grove WQT Historical.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

			Predominant					Samples				in ppm			
Field Name	Subfarm	Acres	Soil Map Symbol	Soil Name	Soil Test Date	Soil Test Lab	Lab Number	Rec. #	Actual #	pH	OM%	P	K	S	CEC
L13		3.8	LfD2	LA FARGE	2021-11-18	Rock River Laboratory	256104	1	1	7.1	1.3	89	121	0	0
L14		6.5	NID2	NORDEN	2021-11-18	Rock River Laboratory	256104	1	1	6.5	1.5	14	80	0	0
L15		5.4	LfC2	LA FARGE	2021-11-18	Rock River Laboratory	256104	1	1	6.9	2.0	82	74	0	0
L16		6.4	LfC2	LA FARGE	2021-11-18	Rock River Laboratory	256104	1	1	7.1	1.5	137	171	0	0
L17		6	LfC2	LA FARGE	2021-11-18	Rock River Laboratory	256104	1	1	6.8	1.5	25	87	0	0
L18		23.9	NIB	NORDEN	2021-11-18	Rock River Laboratory	256104	5	4	6.8	1.4	61	146	0	0
L19		3.8	NIB	NORDEN	2021-11-18	Rock River Laboratory	256104	1	1	6.7	2.0	13	154	0	0
L20		4.6	NID2	NORDEN	2021-11-18	Rock River Laboratory	256104	1	1	7.1	1.8	69	73	0	0
L21		3.2	NIB	NORDEN	2021-11-18	Rock River Laboratory	256104	1	2	6.8	1.8	20	119	0	0
L22		2.3	LfD2	LA FARGE	2021-11-18	Rock River Laboratory	256104	1	1	6.7	1.7	13	74	0	0

Crop Year Soil Test Needed

Field Name	Soil Test Date	2021	2022	2023	2024	2025	2026	2027
L13	2021-11-18						X	
L14	2021-11-18						X	

Field Name	Soil Test Date	2021	2022	2023	2024	2025	2026	2027
L15	2021-11-18						X	
L16	2021-11-18						X	
L17	2021-11-18						X	
L18	2021-11-18						X	
L19	2021-11-18						X	
L20	2021-11-18						X	
L21	2021-11-18						X	
L22	2021-11-18						X	

2020 Luetscher

Land Cover Categories

(by decreasing acreage)

AGRICULTURE

- Soybeans
- Grass/Pasture
- Alfalfa
- Corn
- Other Hay/Non Alfalfa
- Clover/Wildflowers

NON-AGRICULTURE*

- Deciduous Forest
- Mixed Forest
- Developed/Open Space
- Woody Wetlands
- Herbaceous Wetlands
- Developed/Low Intensity

* Only top 6 non-agriculturecategories are listed.

2021 Luetscher

Land Cover Categories

(by decreasing acreage)

AGRICULTURE

- Corn
- Grass/Pasture
- Alfalfa
- Soybeans
- Other Hay/Non Alfalfa

NON-AGRICULTURE*

- Deciduous Forest
- Mixed Forest
- Woody Wetlands
- Developed/Open Space
- Developed/Medium Intensity
- Herbaceous Wetlands

* Only top 6 non-agriculturecategories are listed.

2022 Luetscher

Land Cover Categories

(by decreasing acreage)

AGRICULTURE

- Corn
- Grass/Pasture
- Winter Wheat
- Soybeans
- Alfalfa
- Other Hay/Non Alfalfa

NON-AGRICULTURE*

- Deciduous Forest
- Mixed Forest
- Woody Wetlands
- Developed/Open Space
- Evergreen Forest
- Developed/Medium Intensity

* Only top 6 non-agriculturecategories are listed.

2023 Luetscher

Land Cover Categories

(by decreasing acreage)

AGRICULTURE

- Corn
- Grass/Pasture
- Soybeans
- Alfalfa
- Other Hay/Non Alfalfa

NON-AGRICULTURE*

- Deciduous Forest
- Mixed Forest
- Developed/Open Space
- Developed/Medium Intensity
- Developed/Low Intensity
- Woody Wetlands

* Only top 6 non-agriculturecategories are listed.

2024 Luetscher

Land Cover Categories

(by decreasing acreage)

AGRICULTURE

- Grass/Pasture
- Corn
- Winter Wheat
- Alfalfa
- Fallow/Idle Cropland
- Rye
- Soybeans
- Barley

NON-AGRICULTURE*

- Deciduous Forest
- Mixed Forest
- Developed/Low Intensity
- Developed/Open Space
- Evergreen Forest
- Woody Wetlands

* Only top 6 non-agriculturecategories are listed.

APPENDIX E
SnapPlus Modeling – Historic Practices

NM1: Narrative and Crops Report

Starting Year	**2026**
Reported For	**Cedar Grove WQT Historical**
Printed	**2025-12-12**
Plan Completion/Update Date:	**2025-06-18**
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\Cedar Grove WQT Historical.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

Farm has 10 fields totalling 66.3 cropped acres.
Farm Narrative: None

Annual Farm Notes:

No Annual Farm Notes

Spreader Calibration Methods: No spreader calibration rate documentation has been selected.

Narrative and Crops:

Field Name	Field Acres	2026	2027	2028	2029	2030
L13	3.8	Corn silage to small grain cover crop No Till, cover crop no till 25.1-30 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre	Alfalfa None 3.6-4.5 ton/acre	Alfalfa None 3.6-4.5 ton/acre
L14	6.5	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage to small grain cover crop Spring Chisel, disked, cover crop no till 20.1-25 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 2.6-3.5 ton/acre

Field Name	Field Acres	2026	2027	2028	2029	2030
L15	5.4	Corn silage to small grain cover crop Spring Chisel, disked, cover crop no till 20.1-25 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre	Alfalfa None 3.6-4.5 ton/acre	Alfalfa None 3.6-4.5 ton/acre
L16	6.4	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage to small grain cover crop Spring Chisel, disked, cover crop no till 20.1-25 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre
L17	6	Corn silage to small grain cover crop Spring Chisel, disked, cover crop no till 20.1-25 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre	Alfalfa None 3.6-4.5 ton/acre	Alfalfa None 3.6-4.5 ton/acre
L18	23.9	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage Spring Chisel, disked 20.1-25 ton/acre
L19	3.8	Corn silage to small grain cover crop Spring Chisel, disked, cover crop no till 20.1-25 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre	Winter wheat (forage) to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre
L20	4.6	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Alfalfa Seeding Spring No Till 3.6-4.5 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre

Field Name	Field Acres	2026	2027	2028	2029	2030
L21	3.2	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Corn silage Spring Chisel, disked 20.1-25 ton/acre	Alfalfa Seeding Spring No Till 3.6-4.5 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre
L22	2.3	Corn silage to small grain cover crop Spring Chisel, disked, cover crop no till 20.1-25 ton/acre	Winter small grain silage to Late-Direct Seeded Legume Forage No Till 2.0-3.5 ton/acre/ton/acre	Alfalfa None 3.6-4.5 ton/acre	Alfalfa None 3.6-4.5 ton/acre	Alfalfa None 3.6-4.5 ton/acre

Summary by Crop:

NOTE: Yields calculated using the midpoint of the SnapPlus yield goal range for each crop.

Crops Grouped By Category		2026	2027	2028	2029	2030
Alfalfa	Acres ton			21 85	18 73	42 170
Corn silage to small grain cover crop	Acres ton	21 579		13 293		
Winter small grain silage to Late-Direct Seeded Legume Forage	Acres ton/ton		21 58		21 58	
Corn silage	Acres ton	45 1,015	45 1,015	24 541	24 541	24 541
Winter wheat (forage) to Late-Direct Seeded Legume Forage	Acres ton/ton				4 11	
Alfalfa Seeding Spring	Acres ton			8 32		

NM3: Field Data and 590 Assessment Plan

Reported For	Cedar Grove WQT Historical
Printed	2026-05-05
Plan Completion/Update Date	2025-06-18
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\SnapPlus Files\Cedar Grove WQT Historical.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

Field Data: 66 Total Acres Reported.

Field Name	Sub Farm	FSA Trct	FSA Fld	Acres	County	Critical Soil Series & Symbol	F. Slp %	F.Slp Len ft	Below Field Slope To Water %	Dist.To Water ft	Contour/ Filters	Irrig	Tiled	Rotation	Tillage	Report Period	Field "T" t/ac	Rot Avg Soil Loss t/ac	SCI	Rot Avg PI	Soil Test P ppm	Rot P2O5 Bal lb/ac	P2O5 Bal Target lb/ac
L13				3.8	Sauk	LA FARGE LfD2	14	150	2.1 - 6	1001 - 5000	On contour / No	No	No	A	None	2025-2025	3	NA	NA	NA	89	-15	0
L14				6.5	Sauk	LA FARGE LfD2	14	150	2.1 - 6	1001 - 5000	On contour / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	14	-5	-
L15				5.4	Sauk	NORDEN NID2	14	150	2.1 - 6	1001 - 5000	On contour / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	82	-15	0
L16				6.4	Sauk	NORDEN NID2	14	150	2.1 - 6	1001 - 5000	On contour / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	137	-15	-13
L17				6	Sauk	NORDEN NID2	14	150	2.1 - 6	1001 - 5000	On contour / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	25	-15	-
L18				23.9	Sauk	LA FARGE LfC2	8	200	0 - 2	1001 - 5000	No / No	No	No	CsI	SCD	2025-2025	3	21.7	-1.7	NA	61	-56	0
L19				3.8	Sauk	NORDEN NID2	14	150	0 - 2	1001 - 5000	On contour / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	13	-15	-
L20				4.6	Sauk	LA FARGE LfD2	14	150	0 - 2	1001 - 5000	On contour / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	69	-15	0

Field Name	Sub Farm	FSA Trct	FSA Fld	Acres	County	Critical Soil Series & Symbol	F. Slp %	F.Slp Len ft	Below Field Slope To Water %	Dist.To Water ft	Contour/ Filters	Irrig	Tiled	Rotation	Tillage	Report Period	Field "T" t/ac	Rot Avg Soil Loss t/ac	SCI	Rot Avg PI	Soil Test P ppm	Rot P2O5 Bal lb/ac	P2O5 Bal Target lb/ac
L21				3.2	Sauk	LA FARGE LfD2	14	150	0 - 2	1001 - 5000	On contour / No	No	No	A	None	2025-2025	**3**	**0.4**	**0.7**	**NA**	20	-15	-
L22				2.3	Sauk	LA FARGE LfD2	14	150	0 - 2	1001 - 5000	On contour / No	No	No	A	None	2025-2025	**3**	**0.4**	**0.7**	**NA**	13	-15	-

Crop Abbreviations

Abbreviation	Crop
A	Alfalfa
Csl	Corn silage

Tillage Abbreviations

Abbreviation	Tillage
None	None
SCD	Spring Chisel, disked

FM2: Application Summary Report

Starting Year	**2026**
Reported For	**Cedar Grove WQT Historical**
Printed	**2025-12-12**
Plan Completion/Update Date:	**2025-06-18**
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\Cedar Grove WQT Historical.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

Annual Manure Production And Use By Source

Total Value = $ Value of all nutrients, incorporated including S.

Source		2026	2027	2028	2029	2030
Dairy Liquid	Production (Gallons)	0	0	0	0	0
	Used (Gallons)	530,400	371,200	487,200	215,200	215,200
	Analysis Date	-	-	-	-	-
	Analysis (N/Ninc/Ninj-P2O5-K2O)	4/6/7-3-11	4/6/7-3-11	4/6/7-3-11	4/6/7-3-11	4/6/7-3-11
	Dry Matter (%)	2	2	2	2	2
	Total Value	0.00	0.00	0.00	0.00	0.00

Application Results Reported For Farm All

Annual Pounds Of Available N, P2O5 And K2O Applied From Manure and Fertilizer.

		2026	2027	2028	2029	2030
Produced from Manure (lb)	Ninj	0	0	0	0	0
	P2O5	0	0	0	0	0
	K2O	0	0	0	0	0
Total Available Manure Nutrients Applied (lb)	Ninj	3,713	2,598	3,410	1,506	1,506
	P2O5	1,591	1,114	1,462	646	646
	K2O	5,834	4,083	5,359	2,367	2,367
Total Fertilizer Nutrients Applied (lb)	N	9,292	7,843	5,519	6,197	5,680
	P2O5	0	210	210	746	1,470
	K2O	0	918	918	3,259	6,426
Total Crop Removal (lb)	P2O5	5,348	4,207	4,399	3,522	3,947
	K2O	12,363	10,807	13,792	11,562	14,112
Nutrient Balance (Applied - Crop removal, lb)	P2O5	-3,757	-2,883	-2,727	-2,131	-1,831
	K2O	-6,529	-5,806	-7,515	-5,936	-5,319

WQ1: P Trade Report

Reported For	Cedar Grove WQT Historical
Printed	2026-05-05
Plan Completion/Update Date	2025-06-18
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\SnapPlus Files\Cedar Grove WQT Historical.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

The P Trade Report estimates the annual pounds of phosphorus (P) in surface runoff from cropland entering surface waters. These P loss calculations are based on a field's soil test P concentration, crops, tillage, nutrient management practices and estimates of average runoff and sheet and rill erosion for the predominant soil type. Losses from concentrated flow channel or gully erosion with a field are not included in these calculations. Field runoff losses are calculated for each year as **PTP** (lb P/field/yr). Fields are only included if there are at least 2 years of crops before the selected start year. Before using this report as part of a Water Quality Trade activity, phosphorus losses (PTP) must be converted into 'P credits' according to DNR guidance.

For more information go to **http://dnr.wi.gov/** and type keyword: **Water Quality Trading**

Questions? Please contact DNRphosphorus@wisconsin.gov

This report was developed for Wisconsin DNR Water Quality Trading and Adaptive Management purposes and cannot be used to demonstrate compliance with NR 151 or NRCS 590 NM plan requirements.

P Trade Report				PTP				
Field Name	Soil Series	Soil Symbol	Acres	2026	2027	2028	2029	2030
L13	LA FARGE	LfD2	4	6	19	18	11	8
L14	NORDEN	NlD2	7	40	91	92	51	29
L15	LA FARGE	LfC2	5	29	44	26	18	11
L16	LA FARGE	LfC2	6	48	101	101	66	37
L17	LA FARGE	LfC2	6	23	43	20	13	8
L18	NORDEN	NlB	24	152	150	148	146	144
L19	NORDEN	NlB	4	6	8	6	7	5

P Trade Report				PTP				
Field Name	Soil Series	Soil Symbol	Acres	2026	2027	2028	2029	2030
L20	NORDEN	NID2	5	37	81	44	36	26
L21	NORDEN	NIB	3	6	12	8	5	4
L22	LA FARGE	LfD2	2	15	21	12	7	4
Total			**66**	**361**	**569**	**475**	**360**	**276**

WQ2: Sediment Trade Report

Reported For	Cedar Grove WQT Historical
Printed	2026-05-05
Plan Completion/Update Date	2025-06-18
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\SnapPlus Files\Cedar Grove WQT Historical.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

The Sediment Trade Report estimates the annual tons of sediment in surface runoff from cropland entering surface waters. These sediment delivery calculations are based on RUSLE2 estimates of sheet and rill erosion for the predominant soil. Sediment losses from concentrated flow channel or gully erosion within a field are not included in these calculations. Field sediment yields are calculated for each year as US tons/field/year. Fields are only included if there at least 2 years of crops before the selected start year. Before using this report as part of a Water Quality Trade activity, sediment losses must be converted into 'credits' according to DNR guidance.

For more information go to **http://dnr.wi.gov** and type keyword: **Water Quality Trading**

Questions? Please contact DNRphosphorus@wisconsin.gov

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Sediment Trading

Field Name	Soil Series	Soil Symbol	Acres	Sediment (US Tons)				
				2026	2027	2028	2029	2030
L13	LA FARGE	LfD2	3.8	0.4	3.4	2.3	1.3	0.7
L14	NORDEN	NlD2	6.5	4.2	9.6	9.8	7.7	3.6
L15	LA FARGE	LfC2	5.4	3.5	6.8	2.8	1.7	1.0
L16	LA FARGE	LfC2	6.4	5.4	12.3	12.4	9.1	3.5
L17	LA FARGE	LfC2	6	3.9	7.5	3.2	1.9	1.1
L18	NORDEN	NlB	23.9	16.2	16.2	16.2	16.2	16.2

L19	NORDEN	NIB	3.8	0.5	1.3	0.6	0.8	0.5
L20	NORDEN	NID2	4.6	2.9	6.8	3.5	3.7	2.3
L21	NORDEN	NIB	3.2	0.5	1.2	0.8	0.8	0.5
L22	LA FARGE	LfD2	2.3	2.8	5.6	2.2	1.3	0.8
Total				40.4	70.7	53.8	44.5	30.1

APPENDIX F
SnapPlus Modeling – Permanent Vegetative Cover

NM1: Narrative and Crops Report

Starting Year	**2026**
Reported For	**Cedar Grove WQT Historical**
Printed	**2025-12-12**
Plan Completion/Update Date:	**2025-06-18**
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\Cedar Grove WQT Agroforestry.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

Farm has 10 fields totalling 66.3 cropped acres.
Farm Narrative: None

Annual Farm Notes:

No Annual Farm Notes

Spreader Calibration Methods: No spreader calibration rate documentation has been selected.

Narrative and Crops:

Field Name	Field Acres	2026	2027	2028	2029	2030
L13	3.8	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre
L14	6.5	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre
L15	5.4	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre
L16	6.4	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre

Field Name	Field Acres	2026	2027	2028	2029	2030
L17	6	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre
L18	23.9	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre
L19	3.8	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre
L20	4.6	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre
L21	3.2	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre
L22	2.3	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre	Grass hay None 0.5-1.9 ton/acre

Summary by Crop:

NOTE: Yields calculated using the midpoint of the SnapPlus yield goal range for each crop.

Crops Grouped By Category		2026	2027	2028	2029	2030
Grass hay	Acres ton	66 79	66 79	66 79	66 79	66 79

NM3: Field Data and 590 Assessment Plan

Reported For	Cedar Grove WQT Historical
Printed	2025-12-12
Plan Completion/Update Date	2025-06-18
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\Cedar Grove WQT Agroforestry.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

Field Data: 66 Total Acres Reported.

Field Name	Sub Farm	FSA Trct	FSA Fld	Acres	County	Critical Soil Series & Symbol	F. Slp %	F.Slp Len ft	Below Field Slope To Water %	Dist.To Water ft	Contour/ Filters	Irrig	Tiled	Rotation	Tillage	Report Period	Field "T" t/ac	Rot Avg Soil Loss t/ac	SCI	Rot Avg PI	Soil Test P ppm	Rot P2O5 Bal lb/ac	P2O5 Bal Target lb/ac
L13				3.8	Sauk	LA FARGE LfD2	14	150	2.1 - 6	1001 - 5000	No / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	89	-15	0
L14				6.5	Sauk	LA FARGE LfD2	14	150	2.1 - 6	1001 - 5000	No / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	14	-5	-
L15				5.4	Sauk	NORDEN NID2	14	150	2.1 - 6	1001 - 5000	No / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	82	-15	0
L16				6.4	Sauk	NORDEN NID2	14	150	2.1 - 6	1001 - 5000	No / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	137	-15	-13
L17				6	Sauk	NORDEN NID2	14	150	2.1 - 6	1001 - 5000	No / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	25	-15	-
L18				23.9	Sauk	LA FARGE LfC2	8	200	0 - 2	1001 - 5000	No / No	No	No	CsI	SCD	2025-2025	3	21.7	-1.7	NA	61	-56	0
L19				3.8	Sauk	NORDEN NID2	14	150	0 - 2	1001 - 5000	No / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	13	-15	-
L20				4.6	Sauk	LA FARGE LfD2	14	150	0 - 2	1001 - 5000	No / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	69	-15	0
L21				3.2	Sauk	LA FARGE LfD2	14	150	0 - 2	1001 - 5000	No / No	No	No	A	None	2025-2025	3	0.4	0.7	NA	20	-15	-

Field Name	Sub Farm	FSA Trct	FSA Fld	Acres	County	Critical Soil Series & Symbol	F. Slp %	F.Slp Len ft	Below Field Slope To Water %	Dist.To Water ft	Contour/ Filters	Irrig	Tiled	Rotation	Tillage	Report Period	Field "T" t/ac	Rot Avg Soil Loss t/ac	SCI	Rot Avg PI	Soil Test P ppm	Rot P2O5 Bal lb/ac	P2O5 Bal Target lb/ac
L22				2.3	Sauk	LA FARGE LfD2	14	150	0 - 2	1001 - 5000	No / No	No	No	A	None	2025-2025	**3**	**0.4**	**0.7**	**NA**	13	-15	-

Crop Abbreviations

Abbreviation	Crop
A	Alfalfa
Csl	Corn silage

Tillage Abbreviations

Abbreviation	Tillage
None	None
SCD	Spring Chisel, disked

FM2: Application Summary Report

Starting Year	**2026**
Reported For	**Cedar Grove WQT Historical**
Printed	**2025-12-12**
Plan Completion/Update Date:	**2025-06-18**
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\Cedar Grove WQT Agroforestry.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

Annual Manure Production And Use By Source

Total Value = $ Value of all nutrients, incorporated including S.

Source		2026	2027	2028	2029	2030
Dairy Liquid	Production (Gallons)	0	0	0	0	0
	Used (Gallons)	0	0	0	0	0
	Analysis Date	-	-	-	-	-
	Analysis (N/Ninc/Ninj-P2O5-K2O)	4/6/7-3-11	4/6/7-3-11	4/6/7-3-11	4/6/7-3-11	4/6/7-3-11
	Dry Matter (%)	2	2	2	2	2
	Total Value	0.00	0.00	0.00	0.00	0.00

Application Results Reported For Farm All

Annual Pounds Of Available N, P2O5 And K2O Applied From Manure and Fertilizer.

		2026	2027	2028	2029	2030
Produced from Manure (lb)	Ninj	0	0	0	0	0
	P2O5	0	0	0	0	0
	K2O	0	0	0	0	0
Total Available Manure Nutrients Applied (lb)	Ninj	0	0	0	0	0
	P2O5	0	0	0	0	0
	K2O	0	0	0	0	0
Total Fertilizer Nutrients Applied (lb)	N	0	0	0	0	0
	P2O5	0	0	0	0	0
	K2O	0	0	0	0	0
Total Crop Removal (lb)	P2O5	1,318	1,318	1,318	1,318	1,318
	K2O	4,613	4,613	4,613	4,613	4,613
Nutrient Balance (Applied - Crop removal, lb)	P2O5	-1,318	-1,318	-1,318	-1,318	-1,318
	K2O	-4,613	-4,613	-4,613	-4,613	-4,613

WQ1: P Trade Report

Reported For	Cedar Grove WQT Historical
Printed	2025-06-19
Plan Completion/Update Date	2025-06-18
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\Cedar Grove WQT Agroforestry.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

The P Trade Report estimates the annual pounds of phosphorus (P) in surface runoff from cropland entering surface waters. These P loss calculations are based on a field's soil test P concentration, crops, tillage, nutrient management practices and estimates of average runoff and sheet and rill erosion for the predominant soil type. Losses from concentrated flow channel or gully erosion with a field are not included in these calculations. Field runoff losses are calculated for each year as **PTP** (lb P/field/yr). Fields are only included if there are at least 2 years of crops before the selected start year. Before using this report as part of a Water Quality Trade activity, phosphorus losses (PTP) must be converted into 'P credits' according to DNR guidance.

For more information go to **http://dnr.wi.gov/** and type keyword: **Water Quality Trading**

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P Trade Report				PTP				
Field Name	Soil Series	Soil Symbol	Acres	2026	2027	2028	2029	2030
L13	LA FARGE	LfD2	4	3	2	2	2	2
L14	NORDEN	NlD2	7	5	1	0	0	0
L15	LA FARGE	LfC2	5	4	2	2	2	2
L16	LA FARGE	LfC2	6	13	6	5	4	4
L17	LA FARGE	LfC2	6	2	1	1	1	1
L18	NORDEN	NlB	24	42	10	8	6	6
L19	NORDEN	NlB	4	1	0	0	0	0

P Trade Report				PTP				
Field Name	Soil Series	Soil Symbol	Acres	2026	2027	2028	2029	2030
L20	NORDEN	NID2	5	7	2	2	1	1
L21	NORDEN	NIB	3	1	0	0	0	0
L22	LA FARGE	LfD2	2	1	0	0	0	0
Total			**66**	**78**	**25**	**19**	**17**	**16**

WQ2: Sediment Trade Report

Reported For	Cedar Grove WQT Historical
Printed	2025-06-19
Plan Completion/Update Date	2025-06-18
SnapPlus Version 20.4 built on 2021-06-03	
C:\Users\bgatzke\OneDrive - Probst Group\Desktop\Cedar Grove WQT Agroforestry.snapDb	

Prepared for:
Cedar Grove WQT Historical
attn:Cedar Grove WQT Historical

The Sediment Trade Report estimates the annual tons of sediment in surface runoff from cropland entering surface waters. These sediment delivery calculations are based on RUSLE2 estimates of sheet and rill erosion for the predominant soil. Sediment losses from concentrated flow channel or gully erosion within a field are not included in these calculations. Field sediment yields are calculated for each year as US tons/field/year. Fields are only included if there at least 2 years of crops before the selected start year. Before using this report as part of a Water Quality Trade activity, sediment losses must be converted into 'credits' according to DNR guidance.

For more information go to **http://dnr.wi.gov** and type keyword: **Water Quality Trading**

Questions? Please contact DNRphosphorus@wisconsin.gov

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Sediment Trading

Field Name	Soil Series	Soil Symbol	Acres	Sediment (US Tons)				
				2026	2027	2028	2029	2030
L13	LA FARGE	LfD2	3.8	0.2	0.0	0.0	0.0	0.0
L14	NORDEN	NlD2	6.5	0.9	0.1	0.0	0.0	0.0
L15	LA FARGE	LfC2	5.4	0.2	0.0	0.0	0.0	0.0
L16	LA FARGE	LfC2	6.4	1.0	0.1	0.0	0.0	0.0
L17	LA FARGE	LfC2	6	0.2	0.0	0.0	0.0	0.0
L18	NORDEN	NlB	23.9	5.1	0.4	0.1	0.1	0.0

L19	NORDEN	NIB	3.8	0.2	0.0	0.0	0.0	0.0
L20	NORDEN	NID2	4.6	0.6	0.0	0.0	0.0	0.0
L21	NORDEN	NIB	3.2	0.2	0.0	0.0	0.0	0.0
L22	LA FARGE	LfD2	2.3	0.2	0.0	0.0	0.0	0.0
Total				8.7	0.8	0.3	0.2	0.1

APPENDIX G
Practice Registration Form 3400-207

State of Wisconsin
Department of Natural Resources
101 South Webster Street
Madison WI 53707-7921
dnr.wi.gov

Water Quality Trading Management Practice Registration

Form 3400-207 (R 1/14)

Notice: Pursuant to s. 283.84, Wis. Stats., this form must be completed by any WPDES permittee that is using water quality trading as a method of complying with a permit limitation. Failure to complete this form would not result in penalties. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Applicant Information

Permittee Name	Permit Number	Facility Site Number
Cedar Grove Cheese	WI- 0050245-10-0	

Facility Address	City	State	ZIP Code
E5904 Mill Rd.	Plain	WI	53577

Project Contact Name (if applicable)	Address	City	State	ZIP Code
Bryan Gatzke	1120 A James Drive	Hartland	WI	53029

Project Name
Cedar Grove Water Quality Trade

Broker/Exchange Information (if applicable)

Was a broker/exchange be used to facilitate trade? ○ Yes ◉ No

Broker/Exchange Organization Name	Contact Name

Address	Phone Number	Email

Trade Registration Information (Use a separate form for each trade agreement)

Type	Trade Agreement Number	Practices Used to Generate Credits	Anticipated Load Reduction	Trade Ratio	Method of Quantification
○ Urban NPS ◉ Agricultural NPS ○ Other	TBD	Conversion of rotationally cropped fields to Agroforestry	472 lbs/year P 59 tons/year TSS	1.2:1	SnapPlus V. 20.4.21154.1547

County	Closest Receiving Water Name	Land Parcel ID(s)	Parameter(s) being traded
Sauk	Honey Creek	036-0650-00000, 036-0663-00000 036-0784-00000, 036-0769-00000	P, TSS

The preparer certifies all of the following:

- I have completed this document to the best of my knowledge and have not excluded pertinent information.
- I certify that the information in this document is true to the best of my knowledge.

Signature of Preparer	Date Signed
Bryan Gatzke	6/19/2025

Authorized Representative Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision. Based on my inquiry of those persons directly responsible for gathering and entering the information, the information is, to the best of my knowledge and belief, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Representative	Date Signed
Robert Wills	6/20/2025

Leave Blank – For Department Use Only

Date Received		Trade Docket Number
Entered in Tracking System ☐ Yes	Date Entered	Name of Department Reviewer