



# City of La Crosse Presentation in Opposition to the Incorporation of the Town of Campbell

Incorporation Review Board Public Hearing  
December 3, 2025

## Relevant IRB Standards

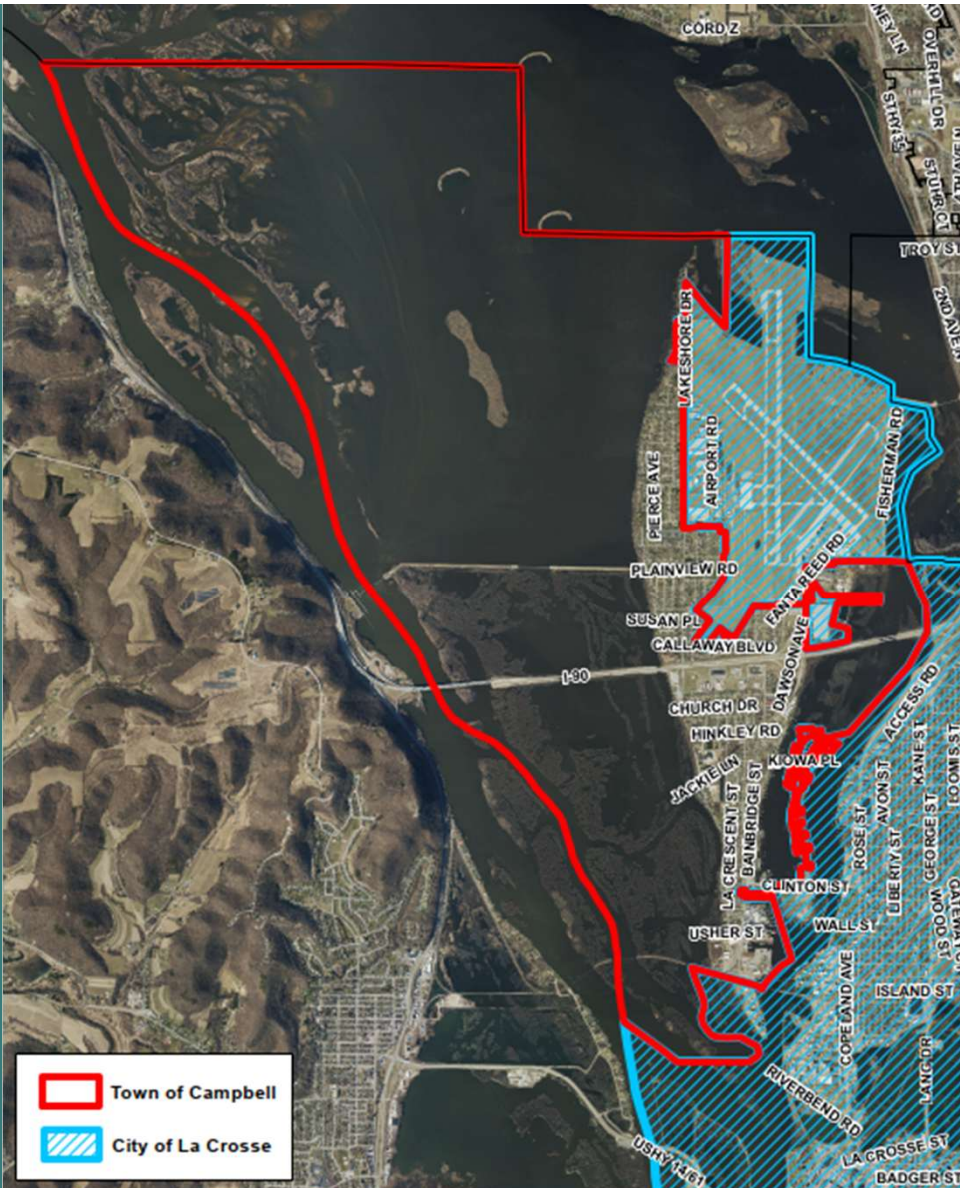
1. Characteristics of territory – (1)(a)
2. Territory beyond the core – (1)(b)
3. Tax revenue – (2)(a)
4. Level of services – (2)(b)
5. Impact on metropolitan community – (2)(d)



# History of Incorporation Attempts

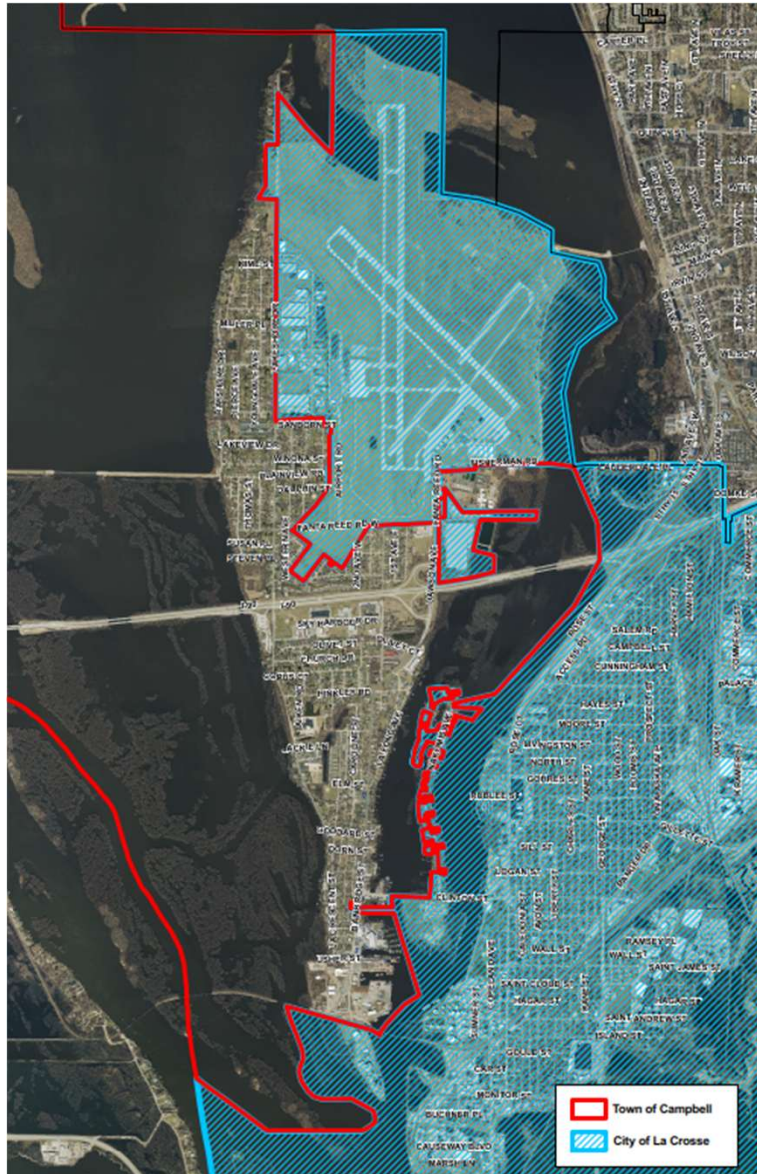
- Prior Town Incorporation Efforts
  - 1973 – Dept. of Administration (predecessor of IRB) denied petition
  - 1977 – Dept. of Admin. denied petition
  - 2001 – settlement reached between City and Town avoiding IRB decision





# Standard (1)(a)

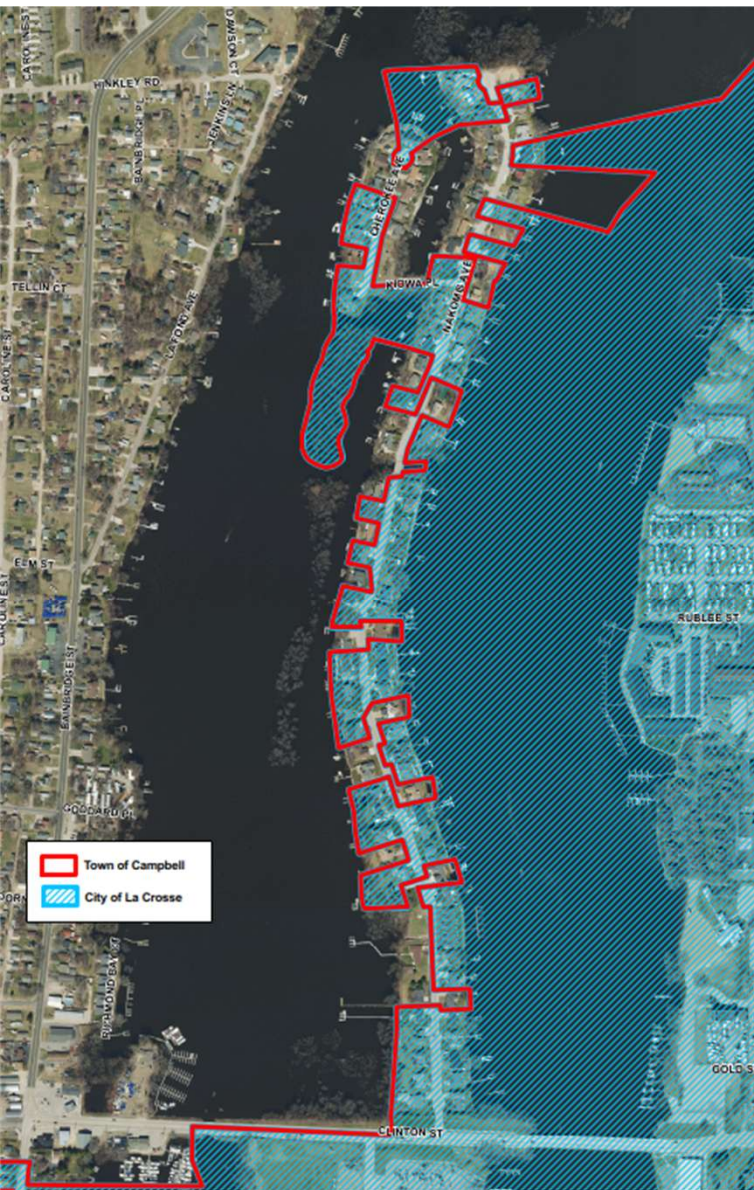
The proposed village is neither compact nor homogenous



## Standard (1)(a) – Proposed village’s physical and political boundaries are neither compact nor homogenous

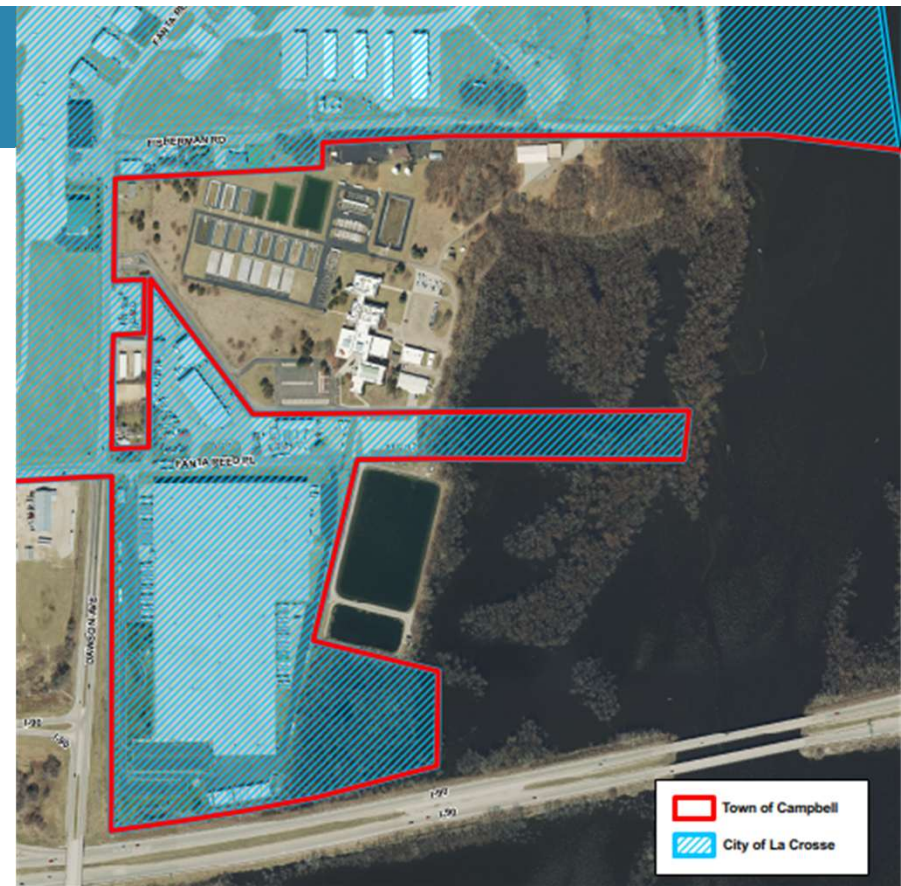
- Total area is 12.9 square miles
  - Mostly water and undevelopable floodplain
- Developed/developable area is only 1.9 square miles
- Developed area is narrow and long stretching out along the City
  - 4 miles long
  - Ranges from around 200 feet to 4,000 feet wide
- City property intersects many areas





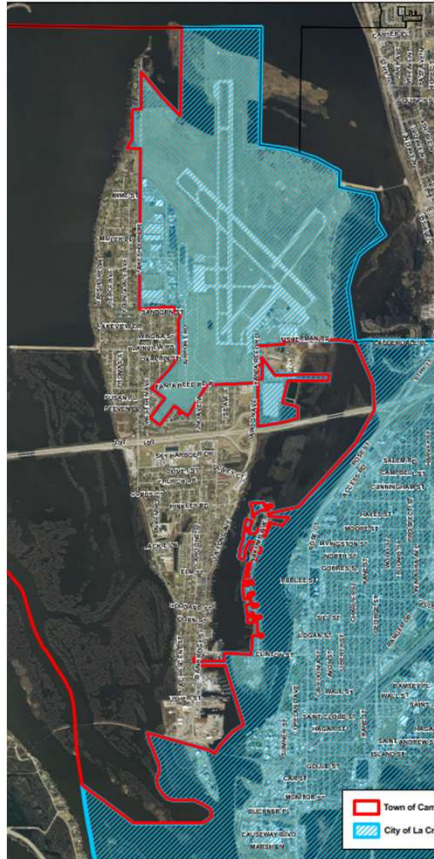
## Standard (1)(a) – Boundary Issues

- Checkerboard boundaries
- Town islands accessible only via water or over City streets
- Most significant on Nakomis (Hiawatha Island) and Airport Interchange Industrial Park



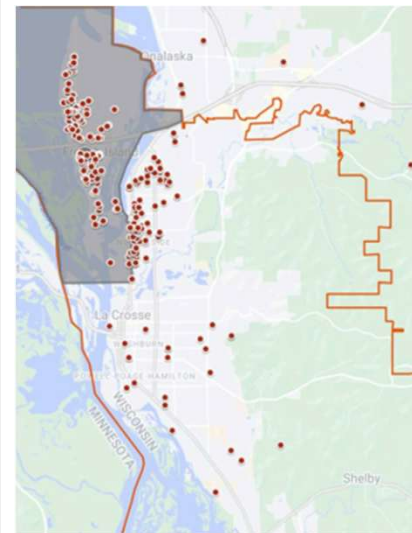


# Standard (1)(a) – Proposed village is tied to the City of La Crosse



## Proposed village is connected physically to the City

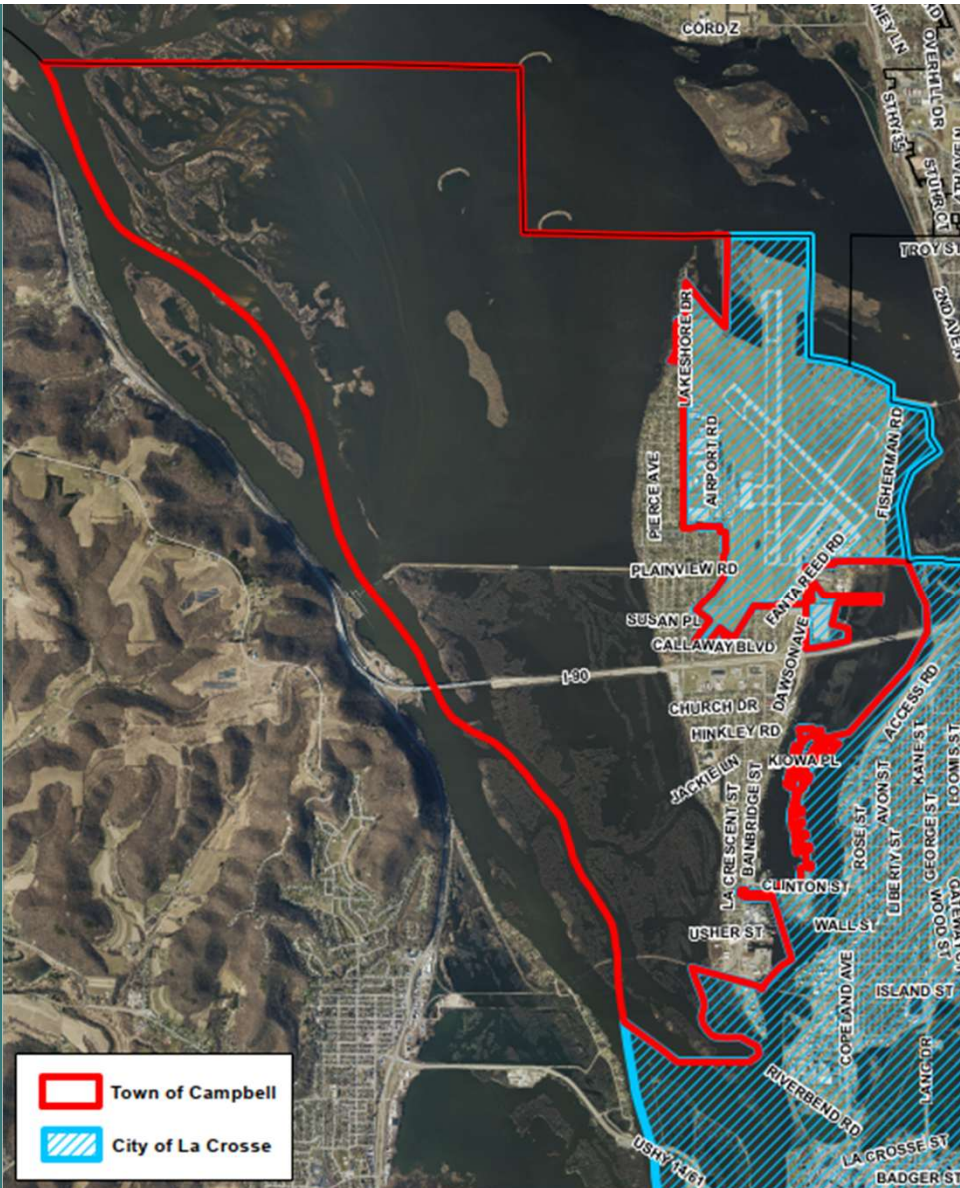
- Access to Town from WI is through the City
- Over 54% of the property on French and Hiawatha Islands is part of the City
- Interconnection between the north and south is via County highways
- Virtually no sidewalks and no bike lanes in proposed village to provide internal connectivity



Summit Elementary attendance map

## Proposed village is connected socially to the City

- Residents depend on the City for:
  - Social activities
  - Retail shopping
  - Services
  - Employment
- Schools are tied to the City
  - District offers school choice and charter options
  - Summit Elementary (a choice school) serves children from both the City and Town
  - All other elementary, middle and high schools are in the City



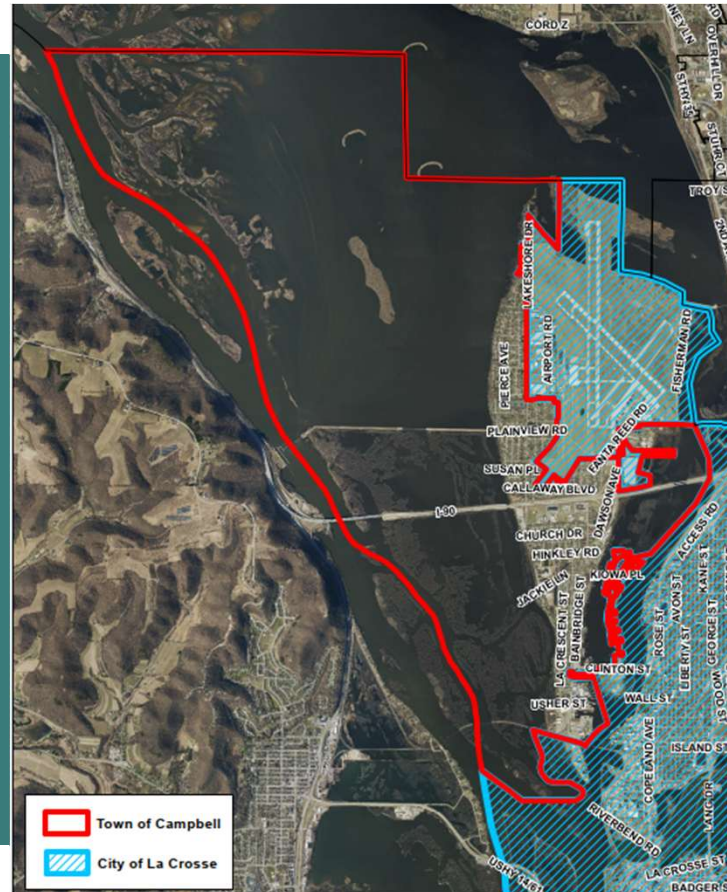
# Standard (1)(b)

No potential for substantial development in territory beyond the core



## Standard (1)(b) – No substantial development potential in territory beyond the core

- Only 14.8% of proposed village is developable
- IRB should not waive this requirement for the *over 85%* of the proposed village's territory that is undevelopable
- Minimum area requirements are designed to ensure that newly incorporated metropolitan communities can provide the type and level of services needed by residents



- Size of proposed village is locked in place
- Most of the proposed village is already developed
  - Only 29 acres of undeveloped land on French Island
- Value of development is not increasing
- Population is projected to decrease
- The average age of residents is increasing



# Standard (2)(a)

No capacity to raise sufficient tax revenue to function as a metropolitan village




## Standard (2)(a) – Fiscal constraints on proposed village

- Unable to provide the level of services expected from a metropolitan village without a referendum to increase property taxes
- State constraints restrict proposed village's levy for operational expenses to an increase of less than \$4,000 per year
- Town currently operating at a deficit. Town's operating expenses exceed Town's operating revenues
- Town's fund balance being used to pay operating expenses

Operating Budget Analysis	2025 Budget	2026 Budget
Revenues (Other than Levy for Debt)	\$1,877,244	\$1,849,359
Total Operating Expenses	-\$2,337,144	-\$2,216,344
Net Operating Surplus / Shortfall	-\$459,900	-\$366,985

Fund Balance Analysis	2025 Budget	2026 Budget
Beginning Fund Balance	\$1,571,711	\$957,311
Ending Fund Balance	\$957,311	\$538,054



## Standard (2)(a) – Town’s proposed water system will further strain the Town’s fiscal capacity

### Water Rate Impact

#### Increased Water Rates to Homeowners

- \$70 million water system, excluding 80% of street repair costs
- Requires installing pipes in Town streets
- The Town’s proposed water system will have the highest water rates in Wisconsin
- \$2,300 to \$2,700/year

### Additional Costs Beyond Water Rates

#### Increased Property Taxes from Road Repair Work

- Water rate excludes 80% of street repair costs to install water pipes, totaling \$11,715,000
- These costs must be funded by property taxes
- Cost is for street repair only
- Cost does not include full replacement, or installation of curb, gutter, sidewalks, or bike lanes

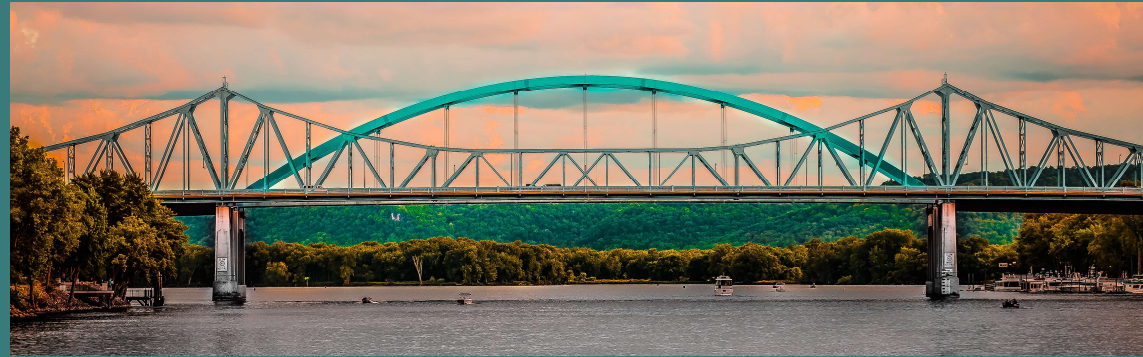
#### Increased Sewer Rates from Sewer Main Repair and Replacement

- Town has 60-70 year old sewer main with infiltration problems
- Replacement at same time as road is open for water project makes sense
- This will increase sewer rates but no cost estimate from Town

#### Homeowners will Need to Pay Additional Costs

- Construction of water lateral to house (est. \$7,500/house)
- Abandonment of private well

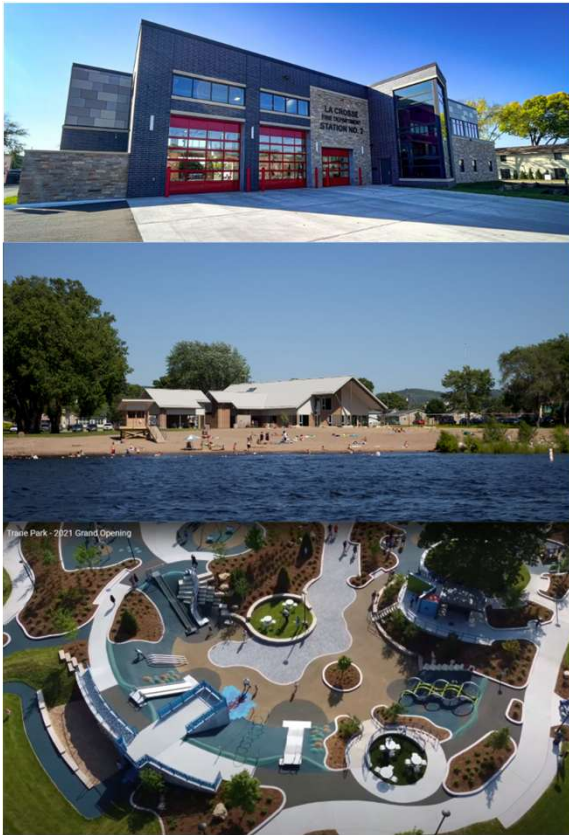




## Standard (2)(b)

City provides a higher level of needed services than the proposed village can

## Standard (2)(b) – Examples of higher-level City services



### City of La Crosse

- **City Hall:** Fully-staffed, specialized divisions, with over 70 employees
- **Professional fire department**
  - 98 full-time firefighters
  - All certified EMTs
  - 16 paramedics
- **Public Works:** Fully-staffed, specialized divisions with 121 full-time employees
- **Parks:** 1,560 acres of parkland
  - Provides many facilities not available in the proposed village
  - 23 full-time employees

### Proposed Village

- **Village Hall:** 3 employees for all functions other than public works
- **Volunteer fire department**
  - 25 part-time volunteers
  - Only some certified EMTs
  - No paramedics
- **Public Works:** 5 ½ employees for streets, parks, facilities, sewer utility, and water utility
- **Parks:** 27.87 acres of parkland
  - Parkland would be reduced with water system and development
  - Serviced by public works staff



## Standard (2)(b) – The proposed village already uses City...

### La Crosse Public Safety



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Fire department mutual aid responses, including in 2024 to a 22-hour fire

Police department mutual aid responses

City street and parking system

Municipal Transit Utility with bus service on French Island

La Crosse Regional Airport



### La Crosse Public Transit

### La Crosse Public Library



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Free programs and events for children, adults and seniors

Extensive materials collection that is the region's resource library

1,500 Campbell resident users

Programs for children, adults, and seniors

Extensive park facilities, including public pools, beaches, splash pads, ice skating rinks, and trails

Harbors/marinas



### La Crosse Parks and Recreation

## Standard (2)(b) – Proposed village's water system is risky

- Water source problems
  - Contaminated with naturally-occurring radium
    - System must treat for radium
    - There will be radon off-gassing from treatment in a residential neighborhood (a current park)
    - Higher costs to dispose of radium contaminated waste
  - Thin protective layer
    - Potential to become impacted by PFAS
  - Questionable quantity
    - Quantity estimated by Town engineer unlikely
    - 2 wells located in same park reduces yield
    - Locating a 3<sup>rd</sup> well difficult and expensive
- Provides limited fire protection
  - Only 2 hours of storage for fire fighting





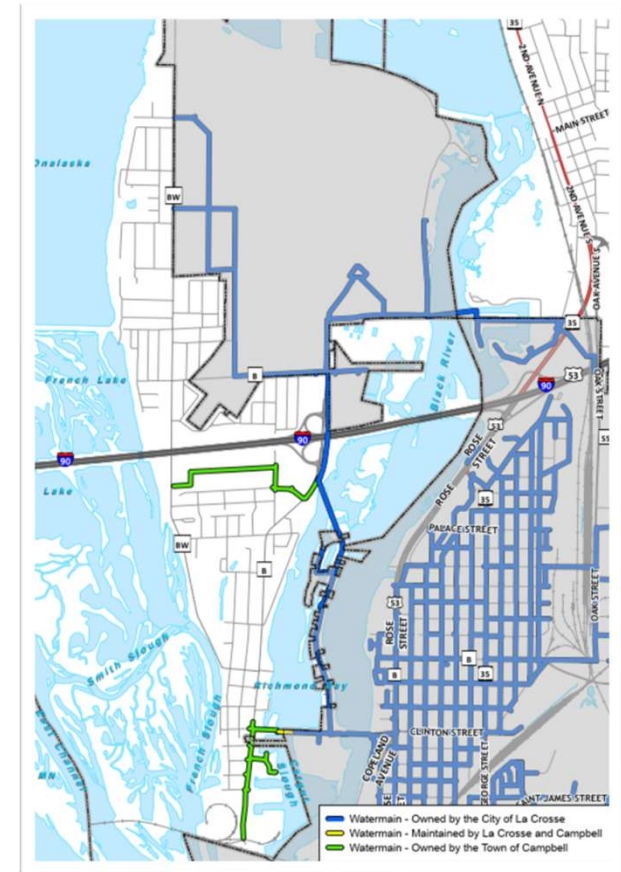
## Standard (2)(b) – Proposed village's water system is very costly

- Town engineer's assumptions unrealistic
  - Construction cost estimate too low
  - Annual O&M cost estimate too low
  - \$18 M in potential grant funds too high
- Independent cost estimate by Donahue & Associates Inc.
  - \$70 million construction costs
  - \$598,973 annual O&M costs
    - PSC estimated O&M costs to be \$625,000 in 2029
- Water rates will be set by PSC
  - Town has failed to provide a water rate estimate using PSC approved methods
  - \$2,300 to \$2,700/year average resident cost per Trilogy Consulting, LLC Report
    - Depending upon grant funds received
  - Could be \$3,624/year if no grant funds received, per PSC
- Highest water rates in Wisconsin



## Standard (2)(b) – City can provide less expensive, more reliable, more efficient, and timelier water service

- Would cost at least \$30 million less for City to provide water to the Town
  - Water from southern La Crosse
  - No new wells
  - No new tower storage
  - No radium treatment system needed
  - No duplication of distribution facilities
- City water meets all safe drinking water standards
- Because of existing City facilities, water could be provided much faster to the most impacted areas
- Provides a much greater level of fire protection





## Standard (2)(b) – Omaha Track Fires

- Have occurred regularly: 2003, 2015, and 2024
- 2024 fire burned for over 22 hours
- Fire response relied on City water and specialized City equipment
  - Used over 1,000,000 gallons of City water
  - Required City to turn on additional wells to supply necessary water
- The proposed village cannot provide this level of fire protection
- The proposed village's proposed water system will be insufficient to fight this type of fire





## Standard (2)(d)

Incorporation will hinder the solution of governmental problems impacting the metropolitan community

## Standard (2)(d) – Incorporation will lock in existing service problems ...



### Confusing Boundaries and Services

Jagged and disconnected boundaries create service inefficiencies and confusion

Town refuses to engage in boundary discussions



### Inadequate Fire Protection

Mutual aid a one-sided benefit to Town

Town did not participate in La Crosse County-funded study on shared fire protection



### Inadequate Water Service

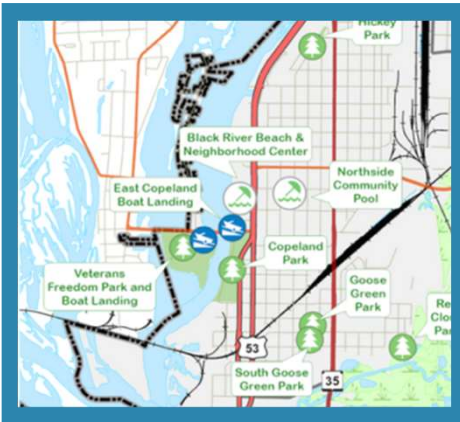
Town's go-it-alone approach creates significant risks for residents and inhibits potential development reliant on higher-level services



### Inadequate Development

Regionally beneficially development and nuisance abatement will not occur because of proposed village's lack of staff, resources, and expertise

## Standard (2)(d) – Incorporation will lock in existing inequity ...



### Inequitable Payment for Services Used

City provides many public services needed and relied upon by Town residents

No future annexations to help contribute to the City's cost of providing these services



### Inequitable Support to Non-Profit Entities

City provides the medical, social, cultural, educational, recreational, and religious needs of the La Crosse area from tax-exempt properties needing City services



### Inequitable Support for Senior Services

City provides or hosts the vast majority of senior services

Town's population trends 10-years older than County's but Town does not contribute to City's cost of hosting services



### Inequitable Aid to the Unhoused

City hosts County facilities, resulting in the unhoused also utilizing City services

Incorporation allows the Town to avoid being part of the solution



# None of the Relevant IRB Standards Are Met and the Petition Should be Denied



1. **Characteristics of territory – (1)(a)**
  - The proposed village is neither homogenous nor compact
2. **Territory beyond the core – (1)(b)**
  - There is no potential for substantial development
3. **Tax revenue – (2)(a)**
  - The proposed village does not have the capacity to raise sufficient tax revenue to function as a village
4. **Level of services – (2)(b)**
  - The City provides a higher level of services than the proposed village offers or will be able to provide
  - The proposed village already relies on and needs the higher level of services provided by the City
  - The proposed village lacks the financial resources to provide commensurate services and facilities
5. **Impact on metropolitan community – (2)(d)**
  - The proposed incorporation will substantially hinder the solution of governmental problems affecting the La Crosse metropolitan community