

**CITY OF LA CROSSE REPORT  
OPPOSING THE PROPOSED INCORPORATION OF THE  
TOWN OF CAMPBELL, LA CROSSE COUNTY, WISCONSIN  
AS THE VILLAGE OF FRENCH ISLAND**

**PREPARED BASED UPON  
INFORMATION PROVIDED BY:**

*Mayor Shaundel Washington-Spivey  
Council President Tamra Dickinson  
Daniel DeGier, Assistant Finance Director  
Nikki Elsen, City Clerk  
Rebecca Franzen, Director of Human Resources  
Matthew Gallager, Director of Engineering and Public Works  
Jacky Greschner, Director of Information Technology  
Shawn Kudron, Chief of Police  
Adam Lorentz, Director of Transit  
Stephen Matty, City Attorney  
Shannon Neumann, City Assessor  
Jason Odegard, Director of Parks and Recreation  
David Reinhart, Chief Building Inspector  
JD Roberts, Airport Business Manager  
Jeffrey Schott, Fire Chief  
Andrea Trane, Director of Planning and Development  
Dawn Wacek, Director of La Crosse Public Library  
Trilogy Consulting, LLC  
Donahue & Associates, Inc.*

**CITY OF LA CROSSE**

**December 1, 2025**

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# **CITY OF LA CROSSE REPORT OPPOSING THE PROPOSED INCORPORATION OF THE TOWN OF CAMPBELL, LA CROSSE COUNTY, WISCONSIN**

## **INTRODUCTION**

The Incorporation Review Board (“Board”) should dismiss the petition to incorporate the Town of Campbell, La Crosse County, as the Village of French Island. The territory sought to be incorporated does not meet the applicable standards for incorporation set forth in § 66.0207, Wisconsin Statutes.

For all the reasons set forth in this Report, the Board should conclude that:

STANDARD 1 (a) Characteristics of territory is not met;

STANDARD 1 (b) Territory beyond the core is not met;

STANDARD 2 (a) Tax revenue is not met; and

STANDARD 2 (b) Level of services is not met; and

STANDARD 2 (d) Impact on the metropolitan community is not met.



## HISTORY OF PRIOR INCORPORATION EFFORTS

The Town of Campbell has unsuccessfully sought to incorporate multiple times before. Each time the reviewing body found that the proposed incorporation failed to meet the statutory standards for incorporation. This time is no different.

In 1973, the Planning Director for the Wisconsin Department of Local Affairs and Development found that the proposed incorporation of the entire Town of Campbell failed to meet the statutory standards set forth in Wis. Stat. § 66.016(1)(a), (1)(b), (2)(a), (2)(b) and (2)(d)<sup>1</sup>. (See **Attachment 1**). Specifically, the 1973 decision found that:

- “[T]he territory is not physically compact or homogenous and that from the standpoint of shopping and social customers the territory has a measure of identity but is an integral part of the entire urban area.” [§ 66.016(1)(a) standard]
- “[D]espite the prospect of substantial development in a small part of the territory, most of the territory beyond the core does not have potential for substantial urban type development within three years.” [§ 66.016(1)(b) standard] The decision further stated that: “it would be an abuse of discretion to waive the requirements of s. 66.016(1)(b) for over 80 percent of the total area to be incorporated.”
- “[T]he proposed village would be able to finance its basic government operations and a variety of service included but not limited to the service presently provided by the town, but that it could not provide services equal to those offered in the City of La Crosse.” [§ 66.016(2)(a) standard]
- “[T]he level of services, both existing and potential, available from the City of La Crosse is superior to those proposed by the village.” [§ 66.016(2)(b) standard]
- “[T]he proposed incorporation would have an adverse effect upon the solutions to metropolitan community problems.” [§ 66.016(2)(d) standard] Regarding this factor, the decision included a four-page comprehensive discussion of the governmental problems faced by metropolitan communities and how the incorporation of another autonomous government within the metropolitan area would hamper the search for workable solutions.

In 1977, the Wisconsin Department of Local Affairs and Development again found that a subsequent attempt to incorporate the entire Town of Campbell failed to meet the statutory standards set forth in § 66.016. (See **Attachment 2**). The 1977 decision incorporated very similar findings to those found in the 1973 decision.

Little has changed in the Town of Campbell since 1977. The Town’s newest attempt to incorporate should again be rejected for the same reasons its prior efforts to incorporate were rejected.

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<sup>1</sup> Wis. Stat. § 66.016 has since been renumbered to be Wis. Stat. § 66.0207.

## **SECTION 1 (a) CHARACTERISTICS OF THE TERRITORY**

The first incorporation standard to be applied under §66.0207(1)(a) requires that:

The entire territory of the proposed village or city shall be reasonably homogenous and compact, taking into consideration natural boundaries, natural drainage basin, soil conditions, present and potential transportation facilities, previous political boundaries, boundaries of school districts, shopping and social customs. An isolated municipality shall have a reasonably developed community center, including some or all features such as retail stores, churches, post office, telecommunications exchange and similar centers of community activity.

The term “homogeneous” as used in this standard was described in *Pleasant Prairie v. Department of Local Affairs & Development*<sup>2</sup> as showing “a legislative concern that the area to be incorporated have a reasonably consistent and uniform composition. The standards set forth in sec 66.016(1), Stats., [now 66.0207(1)], indicate that the entire area be a community, that it have common interests that are internally shared.”<sup>3</sup>

The *Pleasant Prairie* court concluded that it would be appropriate to characterize the homogeneity requirement as seeking “to assure that an incorporated area is urban rather than rural, that development in such an area is not scattered, fragmented, or haphazard, and that similar land uses are grouped together in appropriate municipal boundaries.” The court reached this conclusion based on legislative history which showed the territory to be incorporated is to possess urban characteristics.<sup>4</sup>

In undertaking the analysis for this standard, the Board has the flexibility to consider other factors such as land-use patterns, population density, employment patterns, recreation, and health care customs in its determination of the homogeneity and compactness of the proposed village.<sup>5</sup>

The Board is also to consider whether the factors promote homogeneity with the proposed village or dissipate homogeneity by facilitating the functioning of the area as a part of the larger metropolitan area.

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<sup>2</sup> *Pleasant Prairie v. Department of Local Affairs & Development*, 113 Wis.2d 327, 334 N.W.2d 893 (1983).

<sup>3</sup> *Id.* at 113 Wis. 2d at 334, 334 N.W.2d at 897.

<sup>4</sup> *Id.*

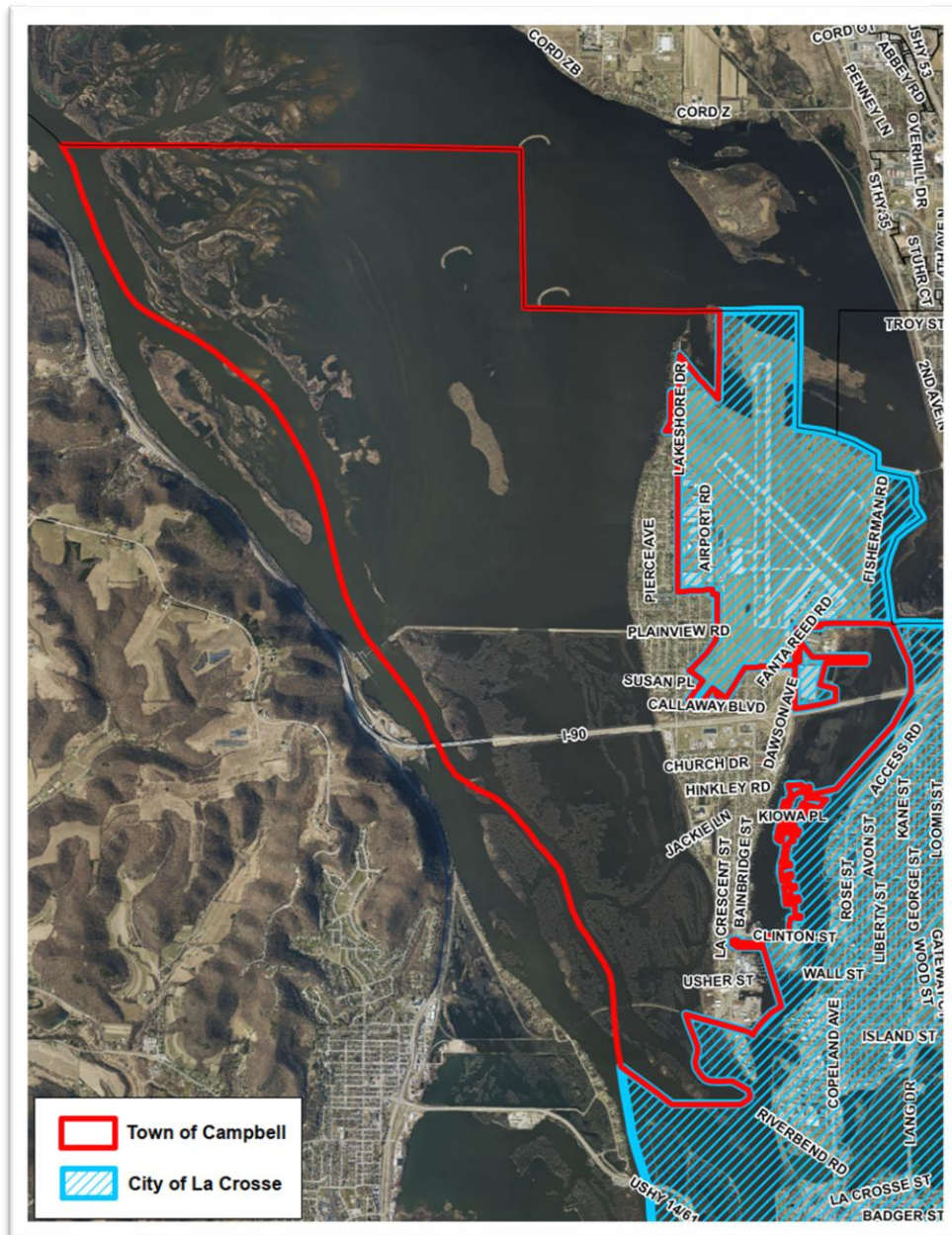
<sup>5</sup> *Id.* at 113 Wis. 2d at 334-338, 334 N.W.2d at 897-899.

## SECTION 1(a) ANALYSIS

## Physical Characteristics

Petitioners seek to incorporate the entire Town of Campbell as the Village of French Island. The territory proposed for incorporation, as shown on **Figure 1**, consists of all or parts of 30 islands located within the floodplain of the Mississippi River and the Black River. The territory is bounded on the west by the main channel of the Mississippi River and the State of Minnesota, on the north by Lake Onalaska (which is an impoundment of the Mississippi River) and the La Crosse Airport, Airport Industrial Park, and Interchange Industrial Park (which are located in the City of La Crosse) and on the east and south by the City of La Crosse.

### Figure 1



This area is not compact or homogeneous physically or geographically.

The proposed village contains 8,282.6 acres. Of this area, 5,619.3 acres (68%) are covered by water. The remaining 2,663 acres (32%) of the territory proposed for incorporation is land that is located either in the floodplain or on dry land.

The land located in the floodplain amounts to 1,588.1 acres. Floodplain land can be further broken down based on flood risk. Land within the 100-year floodplain and floodway is heavily regulated which may prohibit development from occurring. This is especially the case with the land located in the 100-year floodway where substantial hydrology assessments are required to determine feasibility of development. Overall, 87.8% of the proposed village's floodplain land falls into a high-risk category. Land located in the 500-year floodplain is not regulated and can be developed.

Dry land (land not covered by water or in the floodplain) consists of only 1,075.2 acres of the proposed village. Of this dry land, 42.8 acres are undevelopable and unsuited for any type of urban development since the area is either owned by the federal government or inaccessible by other than a boat.

The amount of readily developable land in the proposed village therefore only totals 1,224.8 acres (1,032.4 acres of developable dry land and 192.4 acres within the 500-year floodplain). This comprises less than 14.8% – or 1.9 square miles – of the proposed village. The developable land is located on French Island and Hiawatha Island.

Additional land in the proposed village included in the 100-year floodway or floodplain equals only an additional 1,395.7 acres – or 2.2 square miles – and is very regulated and hard to develop.

**Table 1**

Area of Town of Campbell	Acres	Square Miles
Total Area Town of Campbell	8,282.6	12.9
Town of Campbell in Water	5,619.3	8.8
Town of Campbell in Floodplain (But Not in Water)	1,588.1	2.5
High Risk (100 Year or 1% annual chance) Floodway	1,251.0	1.95
High Risk (100 Year or 1% annual chance) Floodplain	144.7	0.23
Medium Risk (500 Year) Floodplain	192.4	0.30
Town of Campbell – Dry Land/Non-Floodplain – On French and Hiawatha Islands	1,032.4	1.6
Town of Campbell – Dry Land/Non-Floodplain – Not French or Hiawatha Islands	42.8	0.1

Taking the *entire territory* proposed for incorporation into consideration as § 66.0207(1)(a) requires, it is apparent that the territory is not compact or homogeneous in physical terms. The proposed village extends over 12.9 square miles but includes only about 1.9 square miles of land that can be described as readily developable. The rest of the proposed village is located under



water (8.8 square miles) or is either undevelopable or heavily regulated lands (federal lands, wetlands, or land in the 100-year floodway or floodplain)(2.2 square miles). The developed and developable portions of the proposed village are not physically compact or homogeneous with the vast amount of undevelopable land included in the proposed village.

### **Political Boundaries**

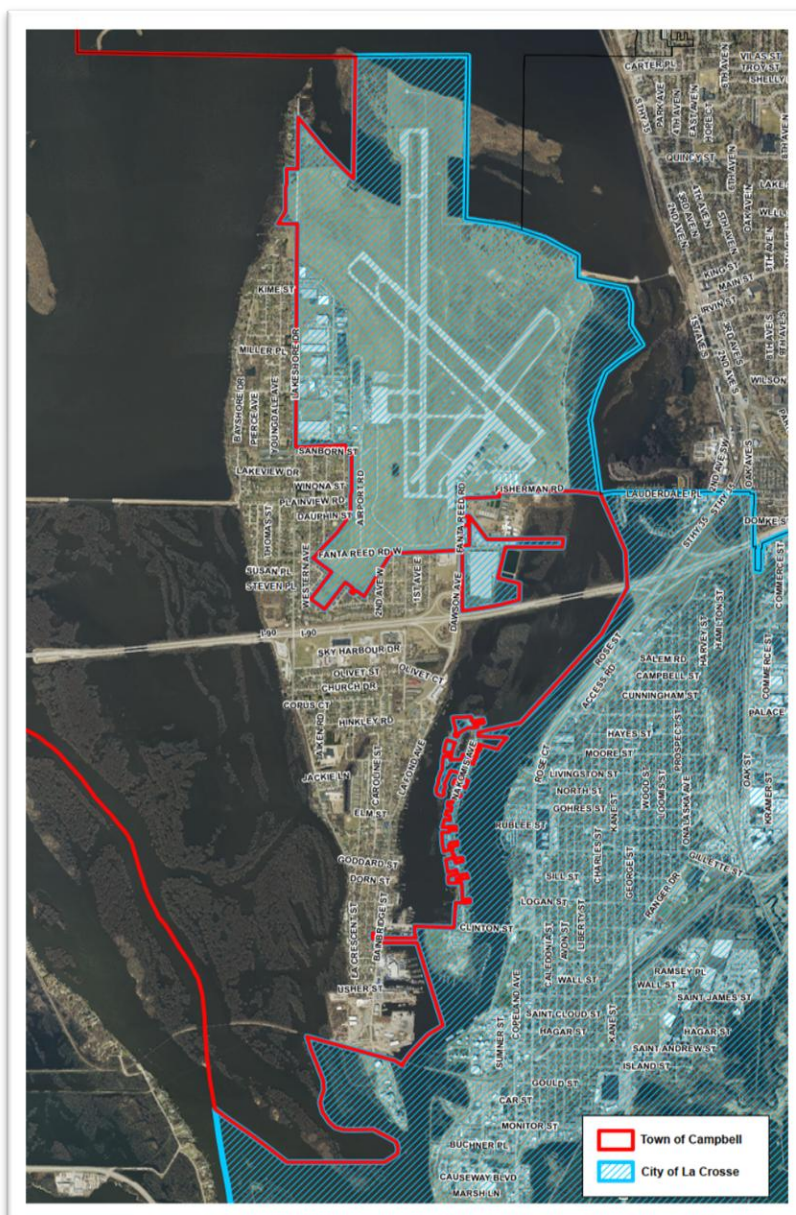
The proposed village's political boundaries with the City are not compact and homogenous. As **Figure 2** shows, the proposed village's border with the City to the northeast, east, and south are jagged and highly irregular.

**Figure 2**

The proposed village's irregular borders with the City reflect the fact that:

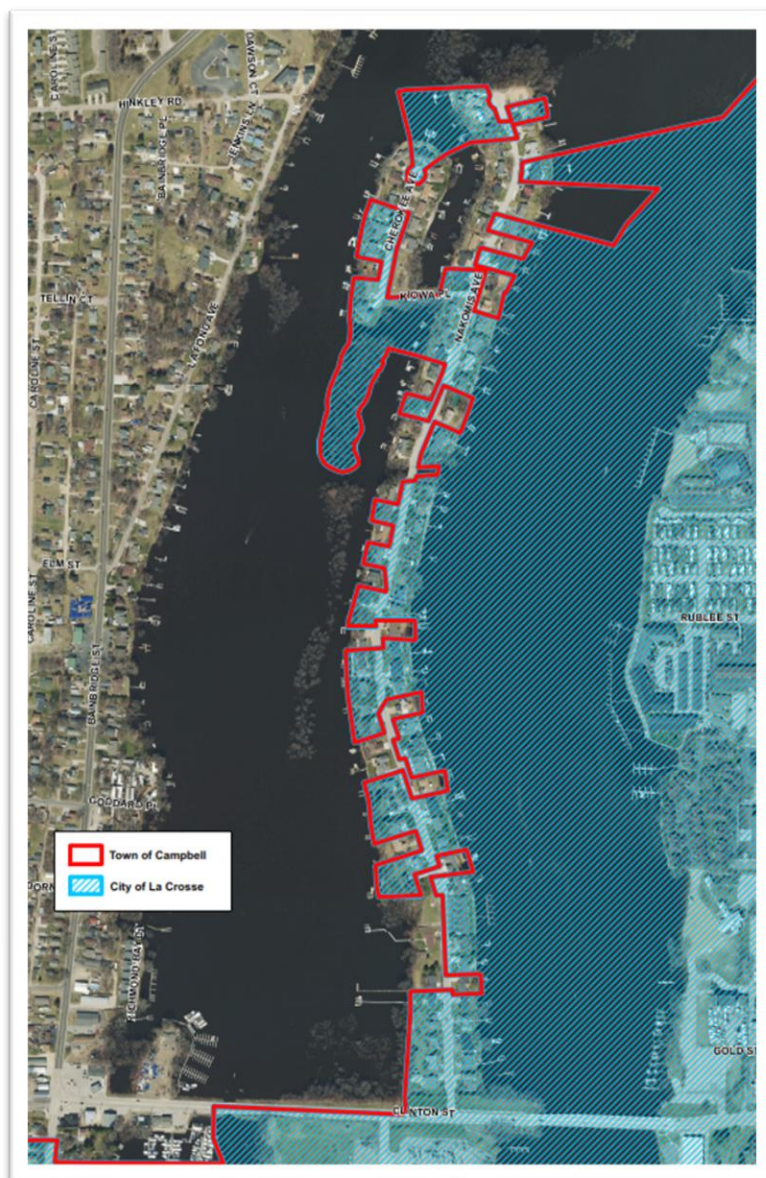
- (i) important City and regional facilities already exist on French Island and Hiawatha Island, and
- (ii) that property owners adjacent to the City (particularly on Hiawatha Island) have sought annexation to the City to receive higher levels of service, such as water supply and fire protection. A list of annexations is provided in **Attachment 3**.

Today **over 54%** of the property on French Island and Hiawatha Island is already part of the City of La Crosse. From the City's perspective, the remaining areas on French Island and Hiawatha Island still located within the Town represent an area for growth for the City. Annexation of this area would allow the City to extend to its natural western boundary, the Mississippi River.



The proposed village's political boundaries are most irregular in two areas. One area is on Hiawatha Island. Of the property located on Hiawatha Island, 77% is already part of the City. The southern end of the island is in the City and contains Veterans Freedom Park (formerly West Copeland Park). The northern end of Hiawatha Island is a residential neighborhood.

**Figure 3**



A majority of homeowners residing on Hiawatha Island have petitioned for annexation as they needed a higher level of urban services. Today, the political boundaries on Hiawatha Island are highly irregular and jagged – like jack-o-lantern teeth. The current political boundaries on Hiawatha Island are shown on **Figure 3**.

The irregular boundaries on Hiawatha Island make the provision of service in this area inefficient and confusing. A prime example of this inefficiency is that although the City has a water line that extends down Nakomis Avenue (the main road on Hiawatha Island), the Town is proposing to install a second water line down Nakomis Avenue so Hiawatha Island residents will not seek annexation to the City. The Town would rather have its residents spend millions of dollars on a second water line than have a Hiawatha Island property owner annex to the City and hook up to an existing water line. Incorporation would lock

this type of inefficiency into place and would prevent the remaining homeowners on Hiawatha Island from choosing to obtain the higher level of services offered by La Crosse.



The second area where proposed boundaries are highly irregular is the area around the City's Airport Interchange Industrial Park. The proposed boundaries in this area are shown on **Figure 4**.

This area is located southeast of the airport and is bounded by Dawson Avenue and Fanta Reed Road to the west, Fisherman Road to the north, the Black River to the east, and the City's Airport Interchange Industrial Park and other parcels located in the City to the south (just north of Interstate 90). The only parcels located in this area are the land of the Upper Midwest Environmental Sciences Center, the American Legion Post 417, a few isolated residences, and access to public land along the Black River.

The only land access into this area is through the City of La Crosse. This area would be a Town island but for its connection to the Town through water. This area has no connection to the rest of the proposed village and is another example of how the proposed village's political boundaries are not compact or homogeneous.

**Figure 4**



## Land Use Patterns

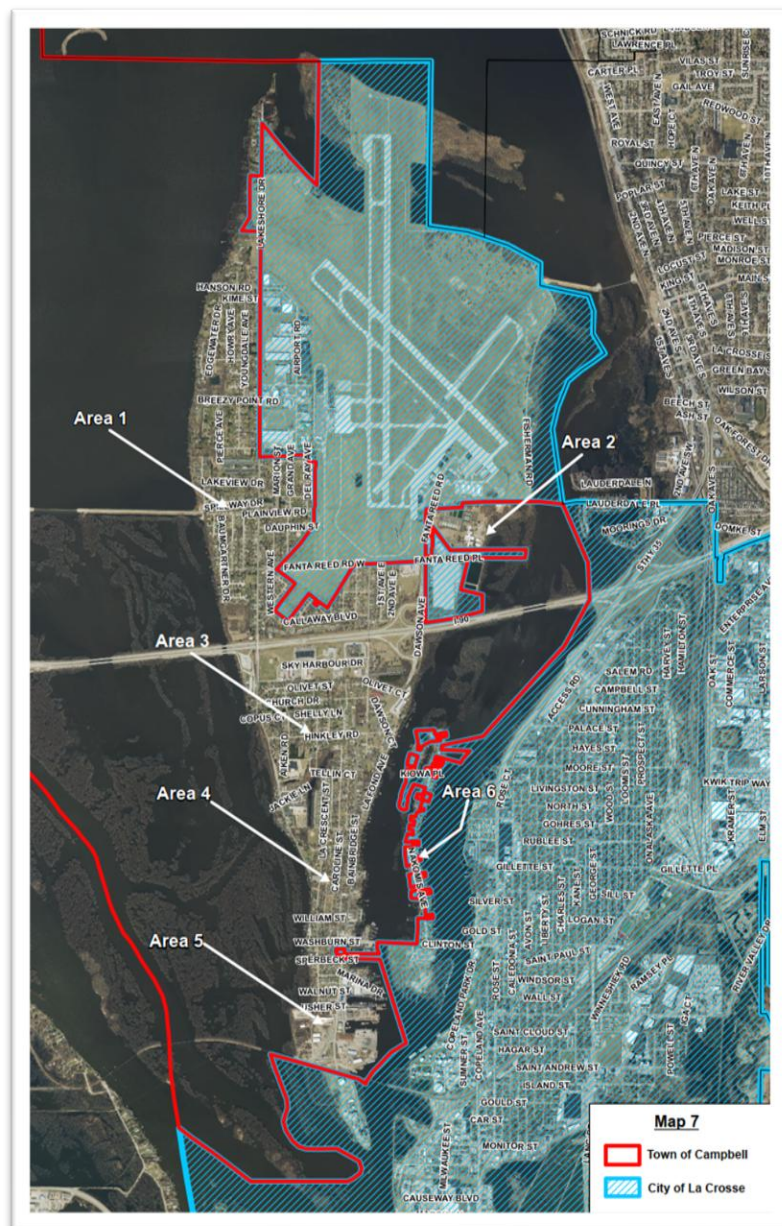
The land use patterns in the proposed village do not promote compactness and homogeneity.

First, as previously discussed, only 14.8% or 1.9 square miles of the territory included in the proposed village is readily developable. Most of the territory included in the proposed incorporation is made up of water, wetlands, floodplains, and floodways. This territory does not need urban services and ought to be left in its natural state and reserved for wildlife habitat and recreation uses. This territory is not compact and homogeneous with the limited amount of readily developable land included in the proposed incorporation.

**Map 7**

Second, even the limited amount of development within the proposed village is not homogeneous and compact. The proposed village is divided in half by Interstate 90 (I-90) and consists of two distinct and disparate areas north of I-90 and four distinct and disparate areas south of I-90 largely connected via County roads without sidewalks or bicycle routes.

These areas are depicted on **Maps 1-7**, which are included as small versions below and attached as larger versions in the Maps Attachment. **Map 7** shows the locations of each of the six areas.





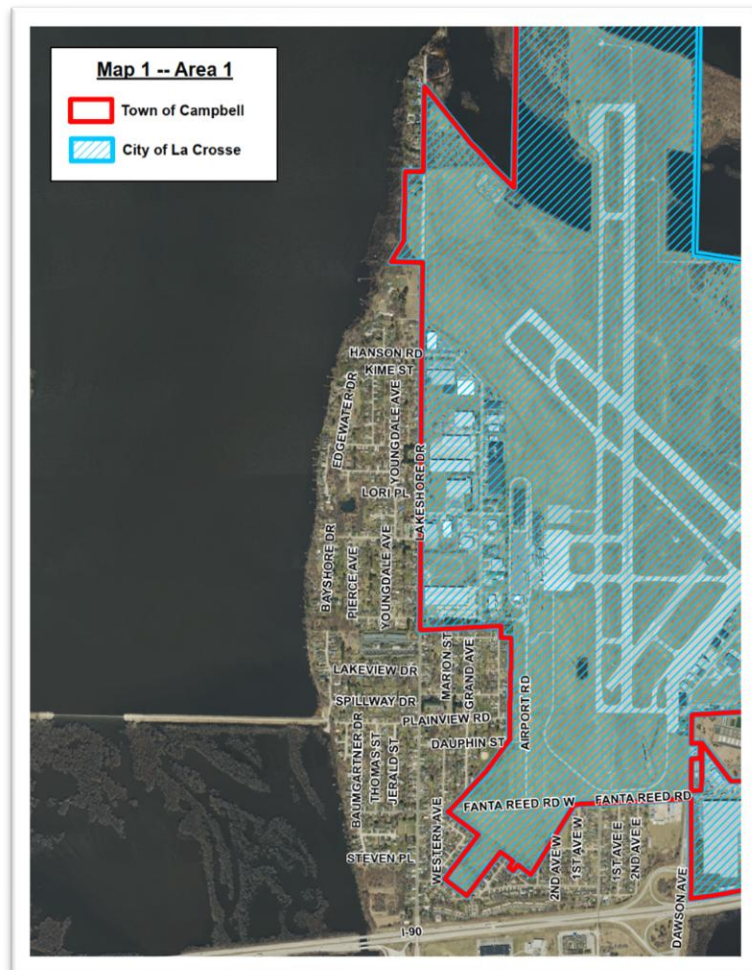
## North of I-90

Area 1 (**Map 1**) is a mostly long and narrow developed area located south and west of the La Crosse Regional Airport and Airport Industrial Park, west of Dawson Ave/County Rd B, and north of the I-90 corridor. This area is defined more by the City of La Crosse property that segments this area, than by any compactness of the area itself. Most of this area is surrounded by water or the City of La Crosse, including the City's Airport and Airport Industrial Park.

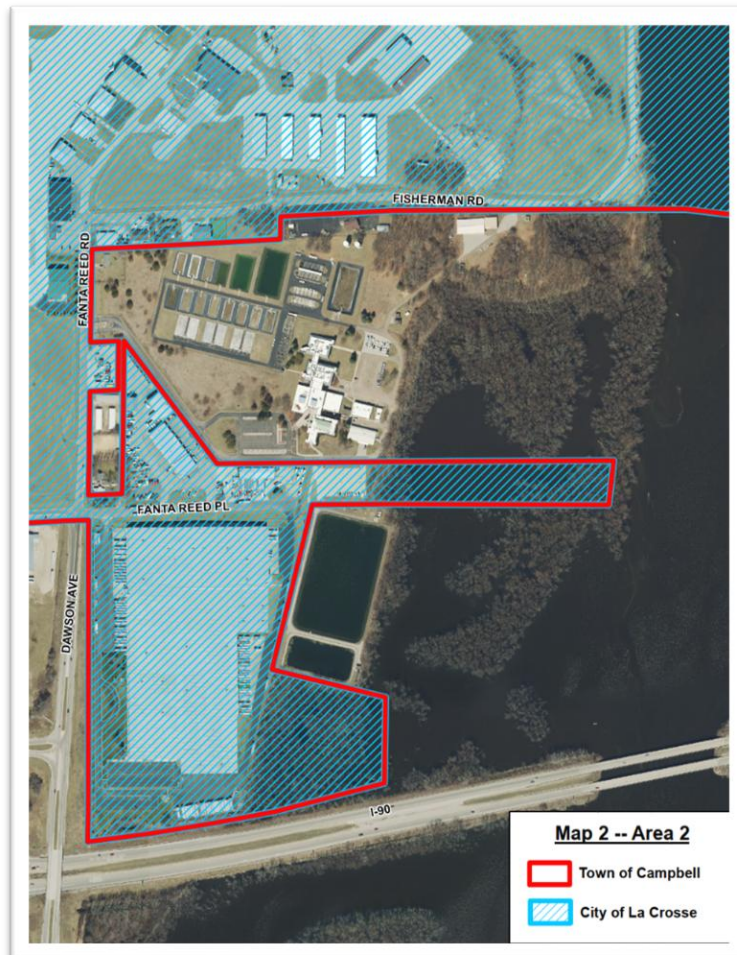
Connectivity between developments within this Area is largely by way of two roads that either lie adjacent to the City (County Hwy BW/Lakeshore Drive) or run largely through the City (Fanta Reed Road).

Single family, detached, residential homes are primarily located in this area, with a collection of homes existing almost as an island south of the Airport and north of I-90. Larger, more expensive homes abut the river, with older, smaller, or less expensive homes near the City's industrial areas and interstate.

According to page 69 of the Town of Campbell Comprehensive Plan 2021-2040, adopted in 2021, ("Town Plan") there are 12 acres of open land, known as the Baumgartner Addition, identified for residential redevelopment in this area. Nelson County Park is located on the north end of this area. Area 1 is also separated from the rest of the homes in the proposed Village by I-90.



Area 2 (**Map 2**) is located southeast of the airport and is bounded by Dawson Ave and Fanta Reed Rd to the west, Fisherman Road to the north, the Black River to the east, and the City's Airport Interchange Industrial Park and other parcels located in the City to the south (just north of I-90).



The parcels within the Town consist of the land of the Upper Midwest Environmental Sciences Center, the American Legion Post 417, self storage units, a few isolated residences, and access to public land along the Black River.

Like Area 1, this area is surrounded by water and the City of La Crosse. This area has little connection to the other developed areas in the proposed village. The only land access into this area is through the City of La Crosse.



## South of I-90

Area 3 (**Map 3**) is located to the south of I-90 and north of Hinkley Rd. Area 3 has a few commercial businesses along I-90 that are closely tied to I-90 traffic, an event venue space, two large churches, and the Town of Campbell's governmental offices. The rest of the area predominantly consists of residential with detached single-family homes and scattered multiple family buildings.

Sidewalks are nonexistent within this Area. Most of the connections between Area 3 and other areas of the proposed village are via two County Roads, County Hwy BW (a collector street) and County Hwy B (an arterial street) not conducive to pedestrian or bicycle traffic. This area also includes a Wisconsin Visitor's Center and Rest Area on the west side of French Island which can only be accessed by I-90. No access to the Visitor's Center is permitted through the Town.



Area 4 (**Map 4**) is located south of Hinkley Rd and north of Washburn/Clinton Street, east of the Mississippi River and west of Richmond Bay. This area includes an elementary school and the offices and contractor lot for Market and Johnson, both off of County Hwy BW. The remaining area consists of residential with detached single-family homes, mobile homes, and scattered multiple family buildings.



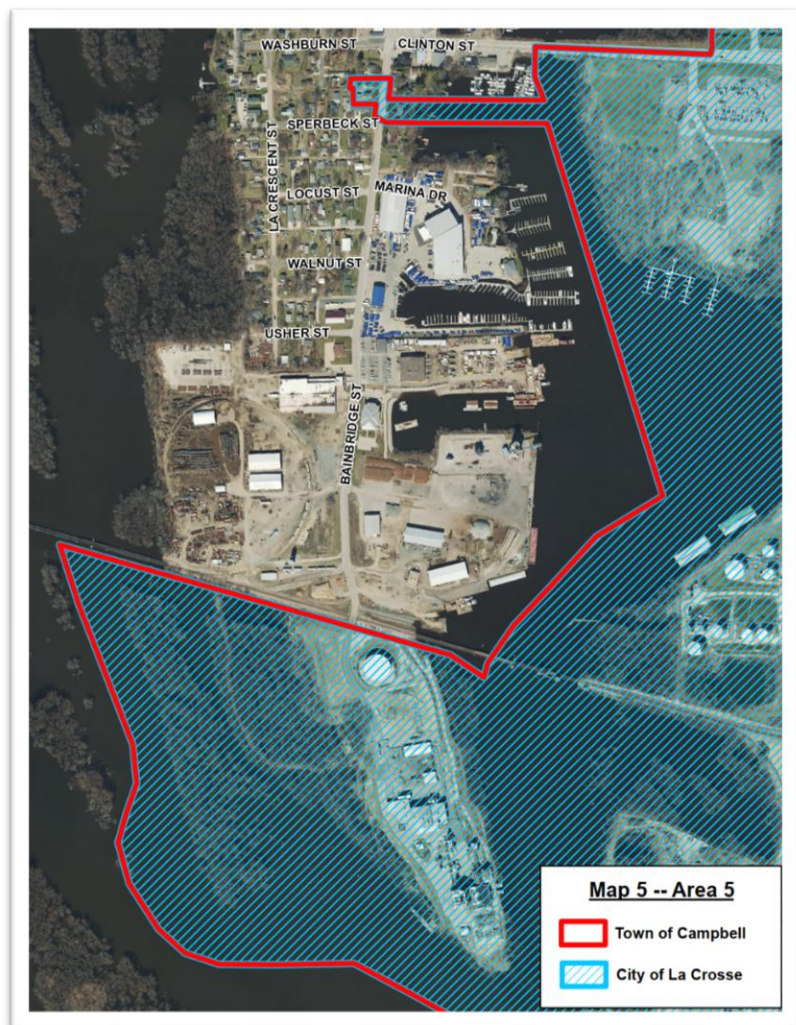
Residential development frequently occurs on lengthy blocks a quarter-mile or more long. Much of the development is also off the County's roads. An existing park in this residential area is the proposed location for the Town's proposed water system wells and treatment plant.

A commercially zoned area bisects this Area and contains commercial and light industrial uses, including a laundromat and a sheet metal business. See Town Incorporation Report, Map 06. On the south end, a junkyard is surrounded by residential properties. Outside of limited sidewalk on or mostly adjacent to the elementary school property, there are no sidewalks in this area to connect residences to the school.

Area 5 (**Map 5**) is the area of the Town located south of Washburn/Clinton Street to the Township limits where the Canadian Pacific Railroad is located. While this area includes some single-family, detached residential, its significance is the industrial uses located along Bainbridge Street south of Usher Street. Here the unique combination of commercially navigable river access and a mainline railroad access make the area the best in the overall La Crosse urban area for “heavy” industry which requires rail and/or water transport. The industrial use of Area 5 is dominated by two companies: F.J. Robers and J.F. Brennan Company.

The heavy industrial uses located in this area of the Town have none of the separation from residential areas in the proposed village cognizant of good urban planning. This area has a greater connection to and dependence on the metropolitan region than it does to the rest of the proposed village.

This industrial area requires a higher level of service than what the proposed village can provide, including water and fire service. If the area were to be redeveloped in a higher or better use, the City has the planning and development experience to assist in creating a comprehensive vision for redevelopment. In the last ten years this area of the Town has experienced two large fires which required response by the City of La Crosse Fire Department, and which posed smoke and fire risks to the nearly adjacent residential properties.



The compactness of the northern part of Area 5 is also interrupted by three single-family residences and a roughly 200 foot portion of Bainbridge Street that are part of City of La Crosse.

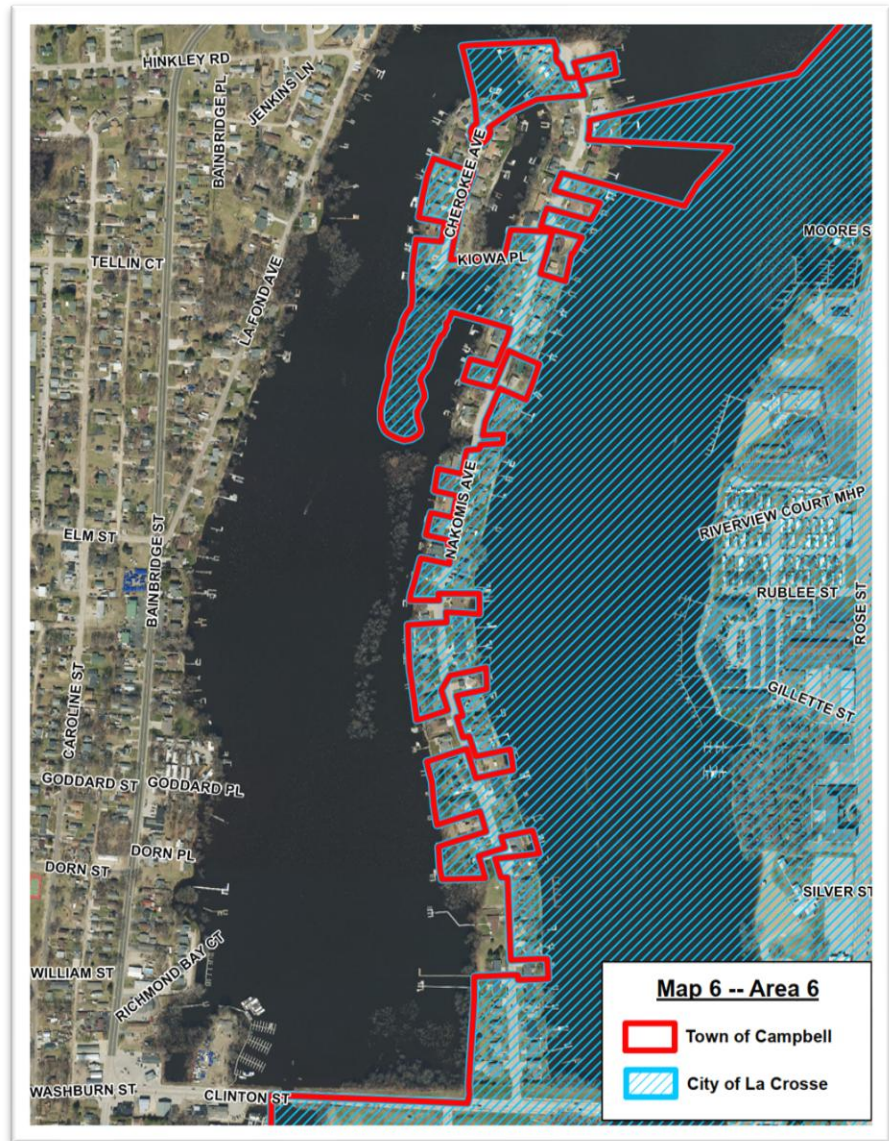
Located to the south of Area 5 is Xcel’s Waste to Energy plant and a refuse derived fuel facility which accepts household and industrial waste from several counties in Wisconsin and Minnesota and manufactures fuel pellets which are burned in the power plant. This facility is located in the City of La Crosse.



Area 6 (**Map 6**) is Hiawatha Island. More expensive homes are located on Hiawatha Island. A majority of homeowners residing on Hiawatha Islands have petitioned for annexation as they needed a higher level of urban services. The boundaries on Hiawatha Island are jagged (as **Map 6** illustrates) which makes the provision of service in this area confusing and inefficient.

Incorporation would lock these problems into place and would prevent the remaining homeowners from having the choice to obtain the higher level of services offered by La Crosse, including City water and fire protection.

With more homes in the City than in the Town, the Hiawatha Island area shares a greater connection with the City of La Crosse than it does with the other developed areas in the proposed village. Another obvious example of that is the fact that the only way a car can get from other areas in the Town to a home on Hiawatha Island is to travel over the City's roads.



Overall, the land uses within the proposed village do not demonstrate homogeneity with the proposed village but rather demonstrate that the area functions as a part of the larger metropolitan area.

## **Population & Population Density**

The population density of the proposed village is not compact and homogeneous. The population is not evenly spread across the proposed village. The proposed village has a population of 4,284 people and covers 12.6 square miles, but its entire population is concentrated in the 1.9 square miles of land on dry land or in the 500-year floodplain (including commercial and industrial areas). The population density of the proposed village therefore ranges from 0 persons per square mile to over 2,255 persons per square mile.

In *Pleasant Prairie*, the court recognized that population disparity over the area proposed for incorporation is relevant to the question of homogeneity and that pronounced variations in population density demonstrate characteristics of the lack of reasonable homogeneity. *Town of Pleasant Prairie, Kenosha Cnty. v. Dep't of Loc. Affs. & Dev.*, 113 Wis. 2d 327, 338, 334 N.W.2d 893, 899 (1983).

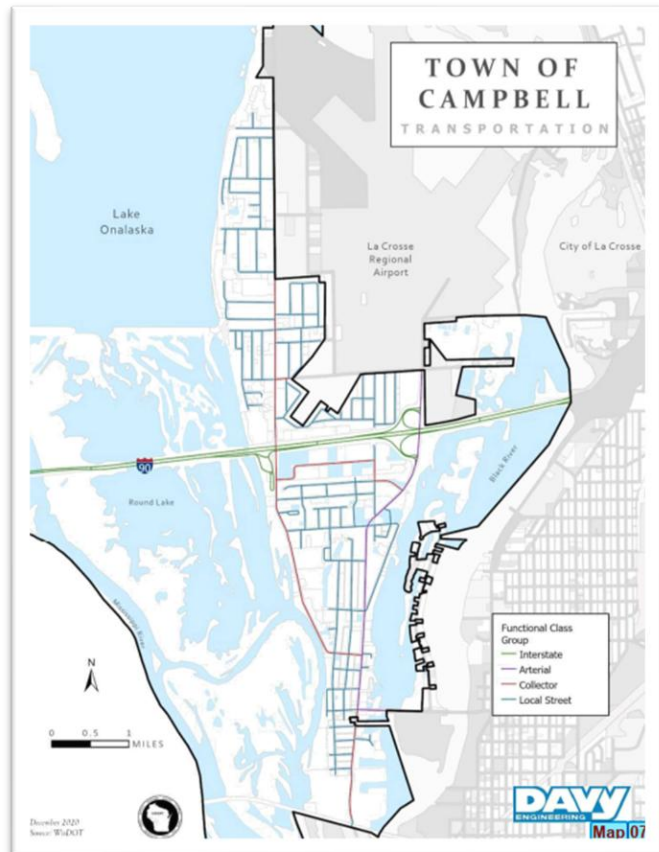
## **Transportation Facilities**

The roads in the proposed village do not promote compactness or demonstrate homogeneity within the proposed village but rather demonstrate the proposed village is integrally connected with and dependent on the City of La Crosse.

One cannot enter the proposed village by road except from I-90 or Clinton Street. Both I-90 and Clinton Street extend into the Town from La Crosse. Therefore, no one can enter or leave the proposed village through Wisconsin without first going through the City.

As Campbell's Map 07 shows (smaller version inserted right), I-90 runs east-west through the proposed village dividing it into two halves. Access to the proposed village off of I-90 is only provided at the County Road B interchange.

I-90 provides a significant barrier between the northern and southern parts of French Island as there are only two roads that run over I-90 and connect the northern and southern parts of French Island.



Access to the southern part of the Town is from the Clinton Street bridge, which is located within the City. Furthermore, the only way a car can get to the area proposed for incorporation on Hiawatha Island is to travel over the City's roads. There is only one connection point between French Island and Hiawatha Island, Clinton Street, and part of that is through the City.

The roads that are located in the proposed village are not primarily used to facilitate transportation within the proposed village but rather are primarily used to facilitate transportation with the greater metropolitan area. This is supported by looking at current Average Annual Daily Traffic (AADT) data provided by WisDOT. AADT counts are used to help communities set timing of traffic signals, determine the number of lanes needed on a street or intersection and gauge the growth or decline in traffic over time. This data also shows where people are going and their destination.

AADT data shows that the highest daily traffic totals are around the I-90 interchange and Clinton Street Bridge with the next highest daily traffic totals along County Hwy B and County Hwy BW, the main throughfares that travel north/south through the Town. (See **Maps 8 and 9**, attached in the Maps Attachment.)

Looking at the proposed village, the higher traffic totals are near the proposed village's entry and exit points. Other than the destination being home, the major destination points contributing to this traffic in the south are: the City's Veterans Freedom Park which is heavily used for its boat ramp, soccer fields, and access for boathouse owners; industrial employers within the Town; and Xcel's Waste to Energy Plant, which is in the City. Major destination points contributing to traffic in the north are all in City of La Crosse: the La Crosse Regional Airport; the Airport Industrial Park; and the Ace Hardware Distribution Center. Except for some of the Town's industrial businesses in the south, all the major destinations contributing to these traffic counts are located within the City.

These numbers illustrate that the transportation system in the proposed village strongly connects the area to the City of La Crosse. Many of the arterial roads, such as County Hwy B, County Hwy BW, and Clinton Street, are partially maintained by the City as they are located in part within its municipal limits.

The Town has approximately 19.63 miles of local streets and roads maintained by the Town but the City has jurisdiction of Fanta Reed Place, Fanta Reed Road (N) and Fanta Reed Road (W) to Rochelle Road.

### **Alleys**

Several areas of the Town include alleys within the Town right-of-way that provide property owners access to the rear of their properties for parking of vehicles and garages. As these alleys are in the Town right-of-way, the Town is responsible for their maintenance. Nearly all of the alleys are gravel; to the extent that any of them are paved, they are in various states of disrepair. Since they are unpaved, they are susceptible to erosion, and there is little storm water infrastructure that would alleviate any drainage issues. The Town is not maintaining these alleys to a level that would be expected in an urban village.



## Sidewalks

Almost no sidewalks exist in the proposed village, except in limited and isolated locations like directly adjacent to Summit Elementary School and at the Clinton Street/County Hwy B intersection, which further demonstrates a lack of compactness and homogeneousness. A single pedestrian bridge provides foot access from a small portion of the Town north of I-90 to the Sky Harbour Drive commercial area in the south, but the bridge is aging and there are no connecting sidewalks at either end of the bridge.

*Photos of Campbell Pedestrian Bridge (2025)*



The absence of sidewalks limits the ability to safely walk from one place to another in the proposed village. As noted on page 28 in the Town Plan, the lack of sidewalks forces pedestrians to walk in the roadway, increasing the likelihood of pedestrian/motor vehicle crashes.

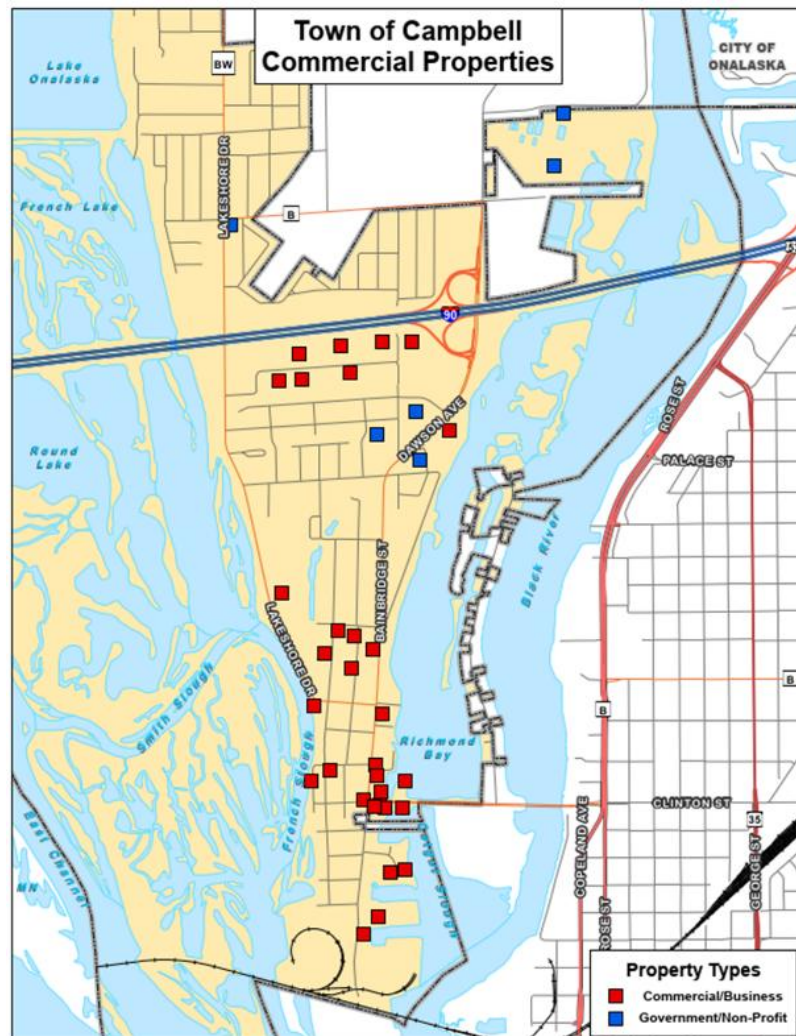


## **Shopping – Goods & Services**

The territory proposed for incorporation is not compact and homogeneous with regard to shopping but rather is connected to the City of La Crosse metropolitan area.

The proposed village does not have the complement of goods and services available that one would expect in a village.

A list of businesses found in the proposed village are listed on **Table 2** on the next page. **Table 2** was produced from Table 1 of the Town of Campbell's Incorporation Submittal for the Village of French Island ("Town Incorporation Report") and updated with an identification of the type of business, as could be determined by information publicly available to the City. A map of the location of the businesses is **Map 10**, a smaller version of which is copied right.



**Table 2**  
**Businesses in Town of Campbell**

<b>Business Name</b>	<b>Address</b>	<b>Employees<sup>6</sup></b>	<b>Type of Business</b>
American Legion	700 Fishermans Rd	8	Non-profit
Crue Building	2020 Caroline St	1	Non-profit
Ready Bus Company	2320 Bainbridge St	60	Service
Dawson 2100 LLC (Celebrations)	2100 Dawson Ave	7	Event location
La Crosse County Jehovah's Witness	1900 Bainbridge	10	Church
Olivet Lutheran Church	2100 Bainbridge	6	Church
Campbell Library	2548 Lakeshore Dr	6	Library
Heilman	202 Sky Harbour Dr	1	Service
Lamers Bus	326 Sky Harbour Dr	11	Service
Bonsack Trucking	402 Sky Harbour Dr		Service
International Furniture	301 Sky Harbour Dr	12	Retail
ETS Performance La Crosse	301 Sky Harbour Dr	5	Service
Liesl's Hair Design	301 Sky Harbour Dr	6	Service
Quillin's Quality Foods	201 Sky Harbour Dr	25	Retail
Norwood Inn	101 Sky Harbour Dr	8	Service
Market & Johnson	1652 Lakeshore Dr	25	Construction/Office
Deml Controls	1638 La Crescent St	5	Service
Proline Auto	1639 Bainbridge St	7	Service
Rising Starr K9 Dog Training	1645 Caroline St	2	Service
French Island Laundromat	1641 Caroline St	2	Service
River City Rentals	1526 Bainbridge St	6	Service
Sagart LLC (Island Outdoors)	1330 Bainbridge St	10	Retail
HRZ Kwik Trip	105 Clinton St	15	Retail
Fur Child LLC	106 Clinton St	3	Service
Weber Auto Body	102 Clinton St	22	Service
Castaway's on the Island	131 Clinton St	25	Restaurant/Bar
French Slough (River Rats)	1311 La Crescent Pl	10	Restaurant/Bar
Hillbilly's Bar & Grill	1322 La Crescent Pl	12	Restaurant/Bar
Iland Tool & Die	1402 Bainbridge St	8	Service
Holiday Marine	108 Clinton St	8	Service
Tom Sayer's Bar & Grill	136 Clinton St	15	Restaurant/Bar
Dugout 47	1303 Bainbridge St	8	Restaurant/Bar
Robin's Nest	328 Goddard St	16	Restaurant/Bar
Huck Finn's Restaurant	129 Marina Dr	18	Restaurant/Bar
American Marine	127 Marina Dr		Office/Marina
F.J. Robers Co.	816 Bainbridge St	11	Construction/Office
JF Brennan	818 Bainbridge St		Construction/Office
French Island Yacht Club	132 Marina Dr	1	Marina

<sup>6</sup> The Town makes no distinction in their data about whether positions are full time or part time. Missing data was not supplied by the Town.

This list and map shows that there are no freestanding businesses located in the Town and north of I-90 except for the Town’s library, the American Legion hall, and the Upper Midwest Environmental Sciences Center—all nonprofit or governmental. The north side residents can as easily go into La Crosse and in many cases make a shorter trip than going to the opposite end of the island.

The list shows that all the stand-alone businesses are south of I-90. The Town has identified 36 businesses located south of I-90, including just 4 retail businesses, 16 service businesses (including construction or transportation-related businesses not typically used by residents, such as trucking and bussing), seven bars or restaurants, one marina, and one event location. Most of the service businesses do not supply services to residents but rather are suppliers of commercial services. The businesses that are defined as retail or service and targeted to residents are limited: they include a salon, furniture store, sporting goods store, convenience store, dog groomer, dog training, gym, laundromat and grocery store.

As the list shows, the situation has not significantly changed since the 1973 incorporation decision which stated that commercial services “fall far short of meeting the needs of the residents for goods, services and employment.” (**Attachment 1.**)

There is no discernable Town center or developed community center. Convenience shopping is limited on French Island to Sky Harbour Drive, by the Quillin’s grocery/gas station. The Town has no places of entertainment other than taverns, no bowling alley or movie theater, and outside of what may be found in the convenience store or grocery store, no coffee shop, bakery, fast food restaurant, pizza shop or other food delivery option. The Town has no electricians, plumbers, painters, or hardware stores supporting the predominantly residential nature of the Town. There are no banks, insurance companies/agents, attorneys, financial advisers, or other professional services found in the Town. There is no U.S. Post Office in the Town nor are there any telecommunication companies or exchanges within the Town.

The median age of Town residents is 10 years older than La Crosse County as a whole (Town Plan p. 11), yet there are no hospitals, medical clinics, chiropractors, dialysis centers, physical therapists, or dental offices in the Town. There are no supported living services, assisted living centers, nursing homes, or memory care centers located in the Town of Campbell to allow residents to stay in the Town when independent living is no longer an option. The Town identifies only one County-run public housing option, War-Leh Manor, with just 18 units. There are no funeral homes in the Town. There are no out-of-home daycare centers and no preschools in the Town.

Even one of the Town’s highlighted major businesses, Celebrations on the River, relies upon the City of La Crosse to support its business. Of the nine identified partner hotels on Celebrations’ website, none are located in the Town of Campbell.<sup>7</sup> None of the partner photographers, DJs, or

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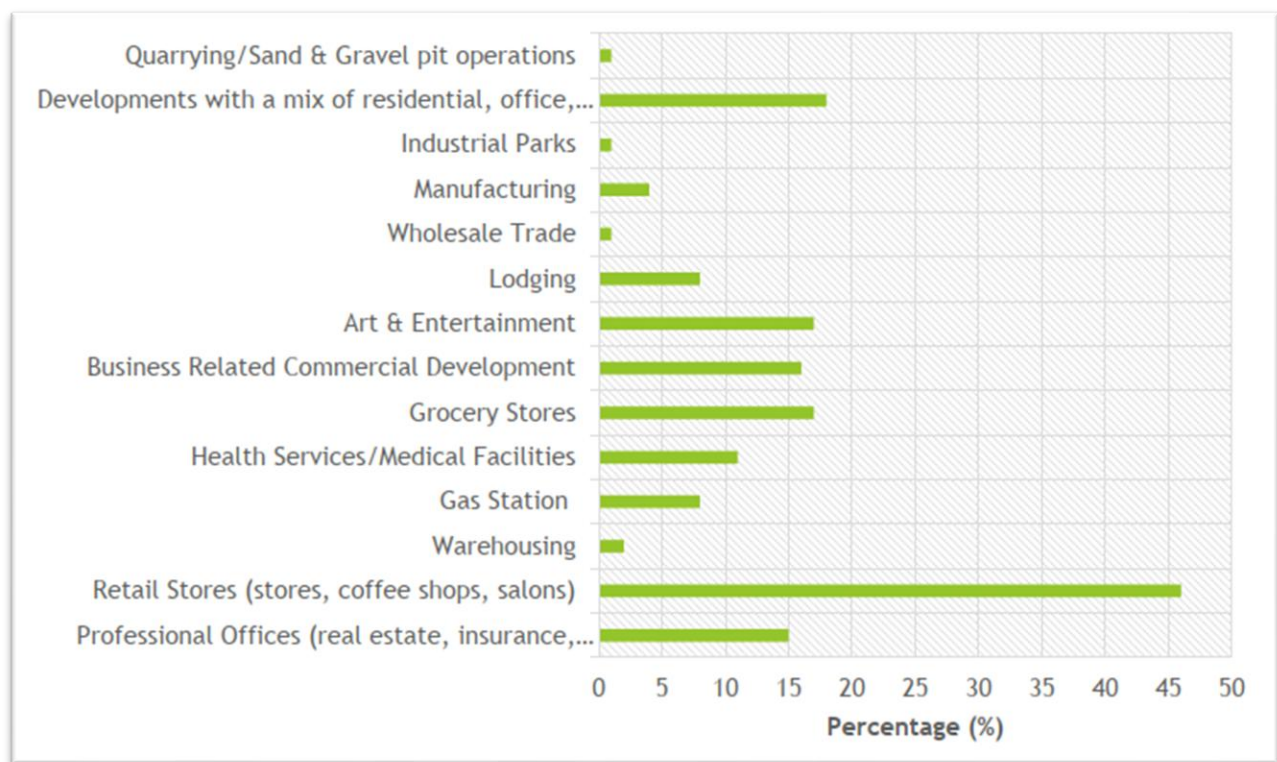
<sup>7</sup> See <https://celebrationslacrosse.com/hotel-shuttle-service/>. The Town’s Norwood Inn is not included even in Celebrations’ listing of “Additional La Crosse, WI Hotels.” See <https://celebrationslacrosse.com/lacrosse-wi-wedding-vendor-directory/>

hair and makeup stylists are identified on the Town of Campbell’s list of businesses.<sup>8</sup> Indeed, because of the lack of retail and service businesses within the Town, the vendor page is largely absent of any identified Town business.<sup>9</sup>

Residents find all shopping activities in the City of La Crosse and the “mall area” located in the City of La Crosse and Onalaska. Old Town North and Downtown La Crosse (located in the City of La Crosse) provide any necessary shopping needs. Regional shopping centers in the La Crosse/Onalaska area provide services and goods not offered on the islands.

The proposed village does not provide the range of goods and services needed by residents. This is emphasized in the Town Plan, with over 45% of Town respondents to its community survey identifying Retail Stores as the most requested new business in the Town. (Town Plan p. 6.)<sup>10</sup> Residents must obtain most goods and services from the City and the greater metropolitan area.

**Town Plan – Community Outreach Survey Response to Question 8:  
“Which of the following types of new businesses would you like to see developed in the  
Town in the future?”**



<sup>8</sup> See <https://celebrationslacrosse.com/vip-photographers/>, <https://celebrationslacrosse.com/vip-dj/>, and <https://celebrationslacrosse.com/hair-makeup/>

<sup>9</sup> <https://celebrationslacrosse.com/lacrosse-wi-wedding-vendor-directory/>

<sup>10</sup> The Town Plan has formatting issues that prevent easily reading Question 8, which says “Which of the following types of new businesses would you like to see developed in the Town in the future?”

## **Employment Patterns**

The territory proposed for incorporation is not compact and homogeneous with regard to employment but rather is connected to the City of La Crosse metropolitan area.

There are few large-scale employment opportunities in the proposed village. Most of the residents in the proposed village work in the City or in other areas outside the proposed village. Most of the employment opportunities in the Town are related to hospitality such as restaurants and taverns, types of industries which frequently provide only part-time or seasonal work for many laborers. J.F. Brennan Company is the largest employer in the Town of Campbell. However, according to the business' website and Linked In page the company is headquartered in "La Crosse, WI" and employs between 501-1,000 employees among its 14 locations located throughout the country.<sup>11</sup>

The Town Plan states the Town's labor force is 3,818 in 2018, 65.1% of which were employed. Obviously, most of these 2,485 employed persons were employed outside of the Town. The Town does not provide close to 2,485 jobs. The Town only identifies 395 jobs in its list of businesses, including part-time and seasonal positions (Town Incorporation Report, p. 28). The Town is not a job center which could be designated as a village.

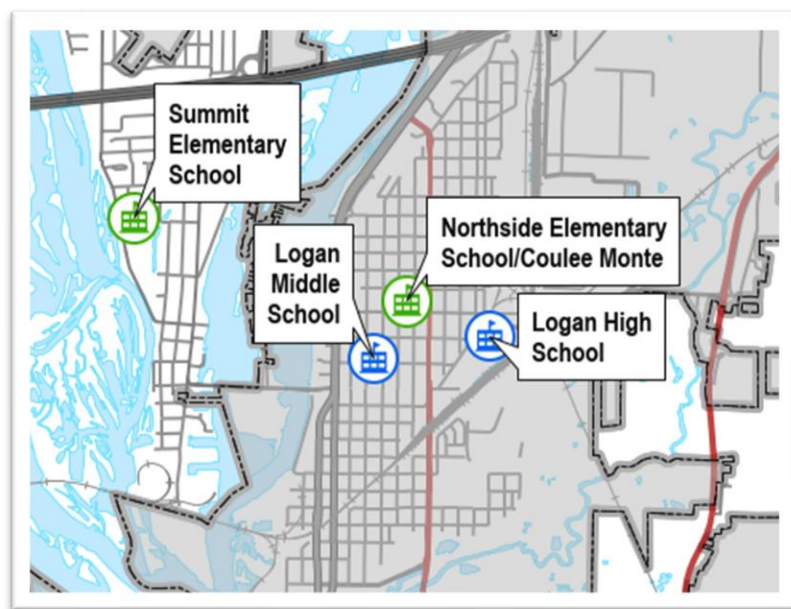
## **School Boundaries & Social Customs**

The territory proposed for incorporation is not compact and homogeneous with regard to school boundaries or social customs but rather is connected to the City of La Crosse metropolitan area.

The territory proposed for incorporation is located in the La Crosse School District. The locations of all La Crosse School District schools are shown on **Map 11**, and the portion showing the schools closest to the proposed village is copied as **Figure 5**.

The District offers choice and charter schools that enable parents to choose a different school than their neighborhood school, resulting in a greater mixing of District students.

**Figure 5**



<sup>11</sup> See <https://www.jfbrennan.com/contact-us>. J.F. Brennan Company's website commonly mentions the company's location and connection to La Crosse, but lacks a single reference to "Campbell."



One public elementary school, Summit Environmental School, is located in the Town but this elementary school does not just serve Town children. Forty-six percent of the students who attend this school are from the City of La Crosse.<sup>12</sup> **Figure 6** shows the Summit Attendance Area and Student Location in 2023.<sup>13</sup>

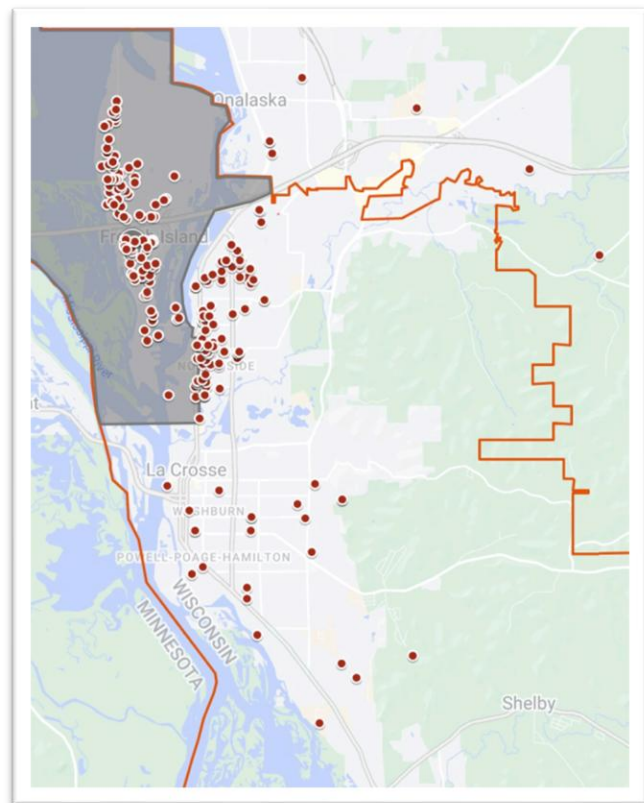
All students from the proposed village must attend middle school and high school in the City since there is neither a middle nor high school in the proposed village.

With respect to schools, the territory proposed for incorporation is connected to the La Crosse School District, not to the proposed village.

There are two churches on French Island: Olivet Lutheran Church located at 2100 Bainbridge and the Kingdom Hall of Jehovah's Witnesses located at 1900 Bainbridge St. These churches are not focused on serving just Town residents but rather provide service to the La Crosse metropolitan area. Olivet's Yelp page,<sup>14</sup> for example, states they are "A La Crosse, Wisconsin church community located on French Island, just off I-90. We draw people from La Crescent, Holmen, Onalaska, and West Salem." In addition, as there are no other Kingdom Halls in the La Crosse area, the Kingdom Hall is also a larger regional church. Town residents of other denominations must go to other communities to have their religious needs met. With respect to churches, the territory proposed for incorporation is clearly connected to a larger area than just the Town.

There is little in the proposed village to create a broader sense of community. The Town of Campbell does not have a full complement of service clubs such as Rotary or Kiwanis. The Town identifies only three formally organized adult-oriented groups: the Volunteer Fire Department, the American Legion Post 417 located at 700 Fisherman Road, and the French Island Lions Club, that meets twice a month at the Community Center. The Town identifies other small unincorporated and issue-specific groups, like the Friends of the Campbell Library and two beautification groups. For youth-orientated groups, the Town identifies Girl Scouts<sup>15</sup>

**Figure 6**



<sup>12</sup> In 2024, there were 298 total students at Summit Elementary and 138 of those students resided in the City of La Crosse.

<sup>13</sup> Figure 6 is from the *Facilities Recommendation Report* dated November 10, 2023, of the Facility Advisory Committee, available at <https://www.lacrosseschools.org/wp-content/uploads/2023/11/FAC-Recommendation-Report-Final-20231110.pdf>.

<sup>14</sup> See <https://www.yelp.com/biz/olivet-church-la-crosse-la-crosse>.

<sup>15</sup> A review of the Girl Scouts of Wisconsin Badgerland's "Find a Troop" website shows that there are no Troops on French Island which are actively seeking new members, indicating that any Troop located on French Island

and Scouting America troops.

The Town of Campbell provides no other area community service groups, particularly for disadvantaged youth, such as a YMCA or Boys and Girls Clubs. The closest facilities for these types of service groups are located within the City of La Crosse. These organizations are important to communities as they provide safe and supportive environments for youth and families, provide recreational opportunities, foster community engagement, and offer educational and social programs.

There are also no cultural centers located in the Town of Campbell. The Hmong Cultural & Community Center, Pump House Regional Arts Center, Weber Center for the Performing Arts (which is the home of the La Crosse Community Theater as well as hosts additional cultural events), La Crosse Symphony Orchestra, Hixon House, Dahl Auto Museum, Children's Museum of La Crosse, Riverside International Friendship Garden, Shrine of Our Lady of Guadalupe, La Crosse Heritage Center, and the Viterbo University Fine Arts Center, are all located in the City of La Crosse. There are no comparable cultural, youth-oriented, or event centers in the Town of Campbell.

It is the City of La Crosse that hosts the region's main annual cultural events, including Oktoberfest<sup>16</sup>, Riverfest, Artspire, La Crosse Storytelling Festival, Art Fair on the Green, Great River Folk Festival, Midwest Music Fest, Moon Tunes, Irishfest, Between the Bluffs Beer, Wine & Cheese Fest, Lobsterfest, and Rotary Lights. These are all events that happen in the City of La Crosse and attract many local residents, including from the Town, as well as visitors from all over.



The Town also lacks any targeted places, programs, or activities for its senior citizens. Through both its Parks and Recreation Department and La Crosse Public Library, the City provides a number of activities for senior citizens which are available to residents of the Town, including educational classes, concerts, dances, movies, yoga, enrichment classes, social clubs, and music lessons.<sup>17</sup> In addition, a number of organizations and locations within the City cater to the region's seniors. AARP offers in-person events and workshops in the City of La Crosse such as special movie screenings, trivia events, and Coffee & Conversations. These events are open to all members of the public and take place in the City of La Crosse or at the movie theater in the Town of Shelby. There are no AARP-sponsored events in the Town of Campbell.

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is an invite-only group and not available to the wider community. See <https://mygs.girlscouts.org/search?type=TROOP>.

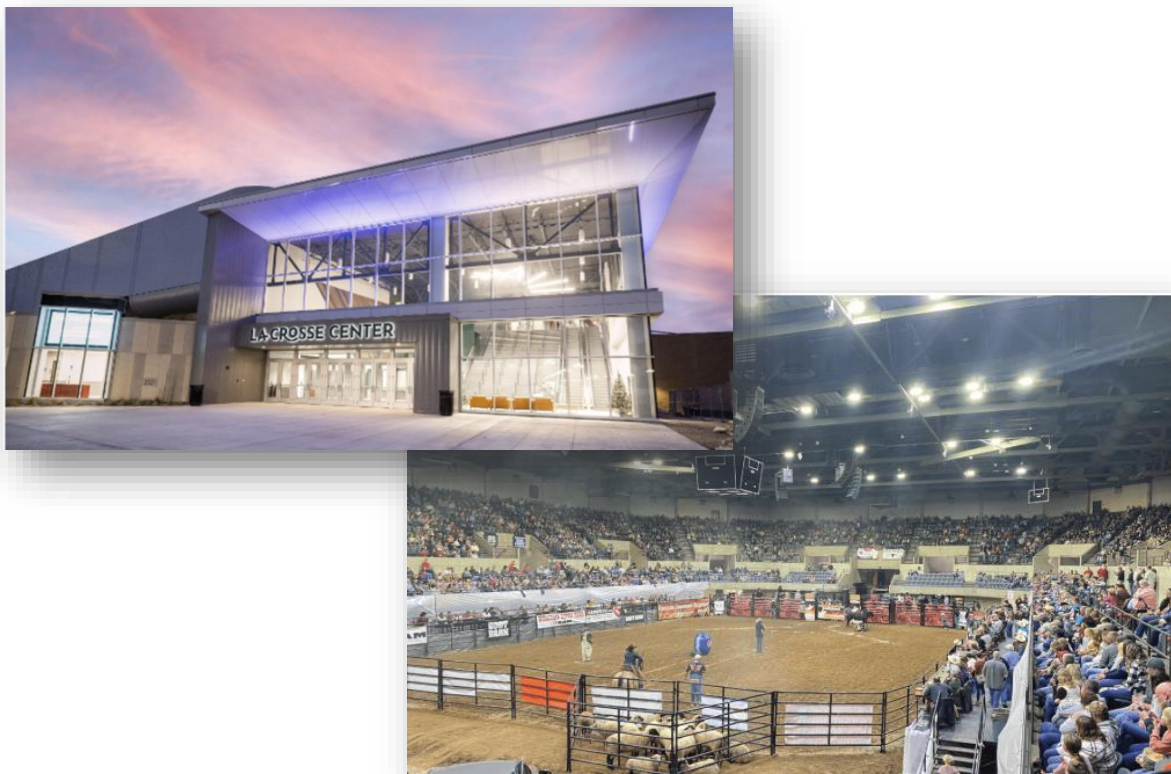
<sup>16</sup> Image source: <https://www.oktoberfestusa.com/>.

<sup>17</sup> See **Odegaard Testimony**, p. 8-9, **Odegaard Exhibit 5**, and **Wacek Testimony**, p. 9-10.

The Harry J. Olson Senior Center, located at 1607 North Street in the City of La Crosse, offers activities, exercise classes, informal social groups, and other events specifically designed for age 50 and older residents in La Crosse and surrounding areas. Of the Harry J. Olson's membership, at least 19 regular members are residents of the Town of Campbell.

The Aging and Disability Resource Center is managed by La Crosse County and available to all County residents. Of their in-person events available on their virtual calendar, all events take place in Holmen, La Crosse or Onalaska and none of them take place in the Town of Campbell.

The City of La Crosse provides the civic, religious, health care, cultural, and educational needs of the area via the La Crosse Post Office, the City's La Crosse Center, the School District of La Crosse (i.e. Logan Middle School and Logan High School), Viterbo College, Western Technical College, University of Wisconsin-La Crosse, movie theaters, restaurants, fraternal organizations, and clubs.



*Photos of the La Crosse Center*



## SECTION 1(a) CONCLUSION

As the above discussion demonstrates, the entire territory of the proposed village is not reasonably homogenous and compact and therefore the petition fails to meet the incorporation standard under §66.0207(1)(a).

Section 66.0207(1)(a) requires that the *entire* territory proposed for incorporation be reasonably homogeneous and compact and it is undeniable that the entire territory proposed for incorporation here is neither homogeneous nor compact.

The territory proposed for incorporation is mostly water. Less than 14.8% – or 1.9 square miles – of the territory is readily developable. This limited amount of developable land is not compact and homogeneous with the surrounding waters. For the same reason, population density across the territory varies dramatically.

The proposed village's political boundaries are not compact or homogeneous either. Boundaries on Hiawatha Island and around the Airport Interchange Industrial Park in particular are jagged, confusing and inefficient. But for connecting waters, numerous parcels within the Town would be considered islands.

The land use in the proposed village also does not promote compactness or homogeneousness. The proposed village does include some residential neighborhoods but these neighborhoods are poorly connected as the proposed village includes no sidewalks or bike trails and is further divided in two by I-90. Roads primarily tie the proposed village to the greater La Crosse metropolitan area where employment, schools, services, shopping and social activities are available. The industrial area on the southern area of French Island with its port and railroad facilities is clearly not tied to the proposed village but rather is tied to the larger metropolitan or regional area.

The proposed village does not provide the retail shopping, recreation, social activities, or services that its residents need. Indeed, from birth at La Crosse hospitals, to schooling at La Crosse schools, to college at La Crosse universities, to shopping and jobs at La Crosse employers, to social events and recreation at La Crosse cultural and event centers, to care at La Crosse senior centers, and back to convalescence and end of life care at the same La Crosse hospitals, the residents of the proposed village are inextricably tied to the City.

The last two times the Town attempted to incorporate, the reviewer found that the Town failed to meet the compact and homogeneous standard. The factual circumstances for this standard are the same as they were in 1973 and in 1977. In the 1973 decision, the reviewer concluded that “the territory is not physically compact or homogeneous and that from the standpoint of shopping and social customs the territory has a measure of identity but is an integral part of the entire urban area.” (**Attachment 1**, 1973 Decision, p. 6.) Similarly, in the 1977 decision, the reviewer concluded that: “[d]espite internal activities and some evidence of cross-commuting for social purposes, shopping, and employment, the territory has major ties to the City of La Crosse,” and that “[b]ased on the information above concerning transportation facilities, governmental boundaries, social customs, shopping patterns, and employment, it is found that

the territory is not reasonably compact and homogeneous.” (**Attachment 2**, 1977 Decision, p. 6.)  
The same conclusion should be reached on this standard now.

The territory in the Town is not compact and homogeneous but rather is closely tied to the City. That is to be expected as the City provides a full range of services and amenities which Town residents undeniably take advantage of. As recognized in *Pleasant Prairie*, 113 Wis.2d 327,

“It must be conceded that the very strictures placed upon incorporation in metropolitan areas makes such incorporation difficult. The characteristics that naturally evolve in areas bordering upon a major metropolitan community almost dictate facts and physical circumstances that tend to give some support to a logical conclusion that the outlying areas do not have an independent viability, but a viability that is dependent upon the adjacent metropolis.” (p. 896-897)

## **SECTION 1 (b) TERRITORY BEYOND THE CORE**

The second incorporation standard to be applied is found in § 66.0207 (1)(b) and requires that:

The territory beyond the most densely populated one-half square mile specified in s. 66.0205 (1) or the most densely populated square mile specified in s. 66.2015 (2) shall have an average of more than 30 housing units per quarter section or an assessed value, as defined in s. 66.0217 (1) (a) for real estate tax purposes, more than 25% of which is attributable to existing or potential mercantile, manufacturing or public utility uses. The territory beyond the most densely populated square mile as specified in s. 66.205 (3) or (4) shall have the potential for residential or other urban land use development on a substantial scale within the next 3 years. The board may waive these requirements to the extent that water, terrain or geography prevents the development.

This standard is comprised of two parts. The first part pertains only to “isolated” villages or cities and is not applicable here. The second part of section (1)(b) pertains to “metropolitan” villages or cities and applies to this incorporation.

The second part of (1) (b) asks that the territory petitioned for incorporation beyond the most densely populated square mile have the “potential for residential or other urban land use development on a substantial scale within the next 3 years.”

### **SECTION 1(b) ANALYSIS**

#### **No Development Potential in Most of Proposed Village**

It is undeniable that the territory in the proposed incorporation beyond the most densely populated square mile does not have the potential for substantial residential or urban development within the next three years. As discussed in the prior section of this report, the amount of readily developed or developable land in the proposed village only totals 1,224.8 acres (1,032.4 acres of developable dry land and 192.4 acres within the 500-year floodplain). This comprises less than 14.8% – or 1.9 square miles – of the proposed village. 85.2% of the territory in the proposed village is undevelopable and unsuited for any type of urban development since the area is either under water, marshland, floodway or floodplain, owned by the federal government or inaccessible.

While § 66.0207(1)(b) provides that the Board *may* waive this requirement to the extent that water, terrain or geography prevents the development, the Board should not waive this requirement for the same reason this requirement was not waived in the 1973 and 1977 decisions. In the 1973 decision, the Department’s State Planning Director stated:

It should be noted also that 66.015 [now 66.0205(5)] requires a minimum area of four-square miles for an incorporation within five miles of a Class 2 city, which is the situation in the present case. The territory does, in fact, meet the four-square mile criterion as previously determined by the Court. The law does not, however,

state whether or not the proposed incorporation shall contain at least four-square miles of land reasonably suited for development. The Head of the Planning Function is authorized to waive the requirements of 66.016(1)(b)[now 66.0207(1)(b)] to the extent that water, terrain or geography prevents rural development. At least 80 % of the territory is not suitable for development. . . and the minimum requirements of 66.015(3) cannot be satisfied without including such unusable land amounting to nearly 50 % of the minimum area of four-square miles. The minimum standards outlined in the statute appear to be also reasonable and some deviation from these would appear to be also reasonable for reasons of geography, terrain and water. *However, it would be an abuse of discretion to waive the requirements of § 66.016(1)(b)[now 66.0207(1)(b)] for over 80 % of the total area to be incorporated.* If the petition were to be resubmitted with the area reduced to minimum size (four square miles), the area would still contain 1.8 square miles or more of unusable land, or nearly 50 % of the total area. Waiving the development requirement to this extent would amount to circumventing the law rather than implementing it.

(**Attachment 1**, 1973 Decision, p. 6 (Emphasis added.))

As the State Planning Director went on to point out, the minimum area requirements in a metropolitan area were not imposed by the legislature without reason. They were designed to ensure that newly incorporated metropolitan communities be able to financially provide the type and level of services needed by residents. Particularly in cases such as the present case, in which there is no potential for future growth to occur through annexation, a larger area is required to ensure an adequate area and potential tax base to support necessary urban services.

(**Attachment 1**, 1973 Decision, p. 6.)

In fact, this idea is explicitly stated in the Legislative Note to 1959 Assembly Bill No. 226A, which established the present incorporation scheme. The Note states:

The requirements for creation of a village or city near a metropolitan community are more stringent to avoid the creation of governmental units without sufficient area or population to economically supply services or perform functions which are needed.<sup>18</sup>

See *Scharping v. Johnson*, 32 Wis. 2d 383, 397, 145 N.W.2d 691, 699 (1966).

This determination from the 1973 decision remains valid today. The proposed incorporation does not meet the requirement of § 66.0207(1)(b) because it includes a vast amount of water, wetland and undevelopable land. Waiving this requirement in this case would thwart the

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<sup>18</sup> This idea is also stated in the Report of the Interim Urban Problems Committee to the 1959 Wisconsin Legislature at 15: “The committee believed it was important to make the standards more stringent in urban areas to avoid the creation of new governmental units without sufficient area or population to provide needed services and functions.”

legislature's intent to limit the creation of new governmental units without sufficient area or population next to metropolitan communities.

### **No Potential for Substantial Development Outside of the Most Populated Square Mile**

This standard cannot be met for a second reason. The proposed village does not have the potential for substantial new development in the next three years within the small amount of vacant developable area it does have.

This standard embodies three distinct components: the kind of development; the time frame in which this development is to occur; and the amount of development. *Pleasant Prairie v. Local Affairs Dept.*, 108 Wis. 2d 465, 475 (Ct. App. 1982). The kind of development with which the standard is concerned is “potential” development, that is, development which has not yet taken place. *Id.* The time frame within which this development must occur is clearly stated in the statute as “three years.” *See Id.* The amount of potential development necessary is “substantial,” development – the amount of which may vary according to the size of the area beyond the core. *Id.*

The proposed village has no potential for substantial growth for several reasons.

First, the size of the proposed village is locked in place. There is nowhere for the proposed village to grow. It is essentially surrounded by the City of La Crosse and the Black and Mississippi Rivers so the geographic boundaries of the proposed village in this area are set.

Second, the proposed village has little vacant developable land. The Town Incorporation Report (p. 44) identifies only two vacant areas – the Sky Harbour Commercial Tract and the Baumgartner Addition – for potential development and one industrial area for potential redevelopment. The Sky Harbour Commercial Tract consists of approximately 17 vacant acres and the Baumgartner Addition consists of 12 vacant acres. The potential for new development is therefore very limited.

Third, the value of the development in the proposed village is not increasing. The 2020 census indicated that there were 2,039 housing units in Campbell. When divided into the Town's population of 4,284, this results in a ratio of 2.1 persons per household. The majority of Campbell's housing units totaling 1,418 or 82% were one-unit structures (1,041 were detached and 17 were attached). There were 32 duplexes, 249 units in buildings of 3-19 units, and 32 mobile homes. The age of this housing stock is almost split, with 46% of it constructed after 1970 and 54% of it constructed before 1970. Less than 7% of the Town's existing housing units were built before 1940. The Town's median occupied housing value according to the American Community Survey (ACS) 2020 was \$186,800. This was lower than La Crosse County's value of \$243,200, and lower than the State of Wisconsin and national levels of \$247,400 and \$229,700 respectively.

The Town Plan states that housing projections for the next twenty years, provided by the Wisconsin Department of Administration (DOA), indicate the Town of Campbell will grow by only 16 new households over the next twenty years. (Town Plan, p. 13.) This will not

significantly increase the available housing supply.

Fourth, the population of the proposed village is not increasing. According to the Town Plan and U.S Census Bureau data, the Town of Campbell has had a slow but steady decline in population growth since 1990. In 1990, the population of the Town was 4,490. In 2000 it was 4,410. In 2010 it was 4,314. In 2020 it was 4,325. The Town Plan projects that the population will continue to decrease through 2040. (Town Plan, pp. 11-12.)

Furthermore, the average age of the residents in the proposed village is increasing. Using 2010 Census data, the Town Plan reports the Town's largest age group is from 45-54, with 53.8% of the population 45 years or older. Based on State projections, the number of senior citizens in the Town is only expected to grow – from 13% in 2000 to 21% by 2030. (Town Plan, p. 11).

In contrast, the 0–4-year age group and the 5-17-year age group in the Town have been decreasing over time. In 1970, these age groups comprised over 40% of the Town's population. In 1990, these age groups comprised just over 25%. In 2010, it was approximately 16.9%. In 2020, it was approximately 16% of the Town's population.

The facts clearly demonstrate that the proposed village is not growing and does not have the potential to grow. Its boundaries are locked in place, its territory is almost fully developed, and its population is not increasing.

### **SECTION 1(b) CONCLUSION**

The area of the proposed incorporation cannot meet the §66.0207(1)(b) standard. The proposed village does not have the potential for residential or other urban land use development on a substantial scale within the next 3 years. Most of the area is water, wetlands or undevelopable lands that have no potential for growth.

While the Board *may* waive this requirement to the extent that water, terrain or geography prevents such development, doing so in this case would circumvent the legislature's intent to limit the creation of new governmental units with inadequate area, growth potential and population next to metropolitan communities. This was the conclusion reached in the 1973 decision and the 1977 decision, and it remains correct today.

## **SECTION 2 (a) TAX REVENUE**

The third incorporation standard to be applied is found in § 66.0207(2)(a), Wis. Stats., and requires that:

The present and potential sources of tax revenue appear sufficient to defray the anticipated cost of governmental services at a local tax rate which compares favorably with the tax rate in a similar area for the same level of services.

### **SECTION 2(a) ANALYSIS**

Wisconsin's municipal finance system is built around a mix of property taxes, state aid, and local revenue sources. Property taxes and state shared revenue account for the vast majority of revenue sources for most municipalities. The state has imposed constraints on municipal budgets that aim to limit the growth in taxation.

The primary constraint on taxation is levy limits, which limit the amount a municipality can increase the tax levy on an annual basis. The main adjustment factor used in calculating allowable levy increases for operating expenses is net new construction, which is the value of all newly constructed/improved buildings within a municipality, net of any value of any demolished or destroyed buildings. Using net new construction as the adjustment factor generally means minimal adjustments to the tax levy for slow growing communities unless voters pass a referendum to exceed the levy limit.

Debt service payments are an exception to the levy limit. Up to the debt limit, there is effectively no limit on property taxes levied for debt service since the allowable increase for the debt service levy is up to the full amount of debt service expenses for the year. This means property taxes will increase if a municipality issues additional debt.

The state also encourages limits on the expense side of the budget through the Expenditure Restraint Incentive Program. The allowable growth is calculated using a Consumer Price Index figure and a portion of the net new construction percentage. The state has tied additional state aid to any municipality that stays under the expenditure growth percentage. Any municipality that exceeds the growth percentage forfeits state aid provided by this program. This program only applies to municipalities with a tax rate of five mills or more, so many towns do not qualify for state aid through this program.

### **Fiscal Capacity for Proposed Village**

The Town's 2026 budget (**Attachment 4**) shows that it is currently operating at a deficit.

The Town's 2025 and proposed 2026 budgeted operating revenues and expenses are shown in the table below.

<b>Operating Budget Analysis</b>	<b>2025 Budget</b>	<b>2026 Budget</b>
Revenues (Other than Levy for Debt) <sup>19</sup>	\$1,877,244	\$1,849,359
Operating Expenses		
General Government	-\$523,948	-\$401,896
Public Safety	-\$953,582	-\$1,012,624
Public Works	-\$790,614	-\$747,449
Culture, Recreation & Education	-\$69,000	-\$54,375
Total Operating Expenses	-\$2,337,144	-\$2,216,344
Net Operating Surplus / Shortfall	-\$459,900	-\$366,985

The Town's budgeted operating expenses for 2025 were \$2,337,144, which does not include capital outlay or debt service. Operating revenues, which exclude the property tax levied for debt service, only amount to \$1,877,244, leading to a projected operating deficit of \$459,900 in 2025.

Similarly, in 2026, the Town's budgeted operating expenses, excluding capital outlay and debt service, are \$2,216,344, a decrease from the 2025 budget, but still more than the projected general operating revenues of \$1,849,359, excluding property tax levy for debt service. Again, this leads to a projected operating deficit of \$366,985.

The other funding needs of the Town are its annual debt service payments and capital outlay. Debt service is covered by the part of the property tax levy that is specific for debt, and it rises and falls as annual debt service changes. Capital outlay is funded through a combination of annual revenues, new debt, or use of the general fund balance. Since the Town is already operating at a revenue deficit, it needs to use a combination of new debt and use of fund balance to pay for debt service and capital outlay. This is shown in the table below.

<b>Capital / Debt Budget Analysis</b>	<b>2025 Budget</b>	<b>2026 Budget</b>
Property Tax Levy for Debt	\$561,366	\$559,346
Debt Proceeds	\$250,000	\$285,000
Capital Outlay	-\$404,500	-\$278,590
Debt Service	-\$561,366	-\$618,028
Net Capital / Debt Surplus / Shortfall	-\$154,500	-\$52,272

<sup>19</sup> Revenues do not include funds from other financing sources (i.e., note proceeds and applied fund balance).



The Town's expenses have grown at a much faster pace than the levy limit or state aid, so its fund balances are projected to be used extensively to balance the Town budget in 2025 and 2026. The Town planned to issue \$250,000 of new debt and use \$614,400 of fund balance to fill its funding gap in 2025. This was projected to bring the general fund balance down to \$957,311. The 2026 budget plans to issue \$285,000 of new debt and use \$419,257 of its fund balance to fill its funding gap, leaving the fund balance at just \$538,054 at the end of 2026. This is shown in the table below.

<b>Fund Balance Analysis</b>	<b>2025 Budget</b>	<b>2026 Budget</b>
Net Capital Surplus / Shortfall	-\$154,500	-\$52,272
Operating Surplus / Shortfall	-\$459,900	-\$366,985
Total Funding Gap (Fund Balance Applied)	-\$614,400	-\$419,257
Beginning Fund Balance	\$1,571,711	\$957,311
Fund Balance Applied	-\$614,400	-\$419,257
Ending Fund Balance	\$957,311	\$538,054

Even if the Town plans to replenish the fund balance through future debt issues, this deficit appears to be structural. The Town reduced its operating budget in 2026 for all expense categories except public safety but still has a deficit of about \$367,000 (almost 20% of operating revenues) between operating expenses and revenues available to fund operating expenses. It appears very likely that, even if it does not increase service levels, the Town will have to rely even more on new debt to fund both capital needs and, potentially, operating needs if it cannot pass a referendum to raise the general operating levy.

State constraints on levy limit increases prevent the Town from increasing its operating levy by more than the amount of net new construction. The net new construction rate over the past 4 years has allowed the Town to increase the levy by an average of less than \$4,000 per year for operating expenses. It is unclear how much longer the Town can continue to provide even its existing level of services while reducing general government spending and using its general fund reserves to provide a balanced budget.

State aid, included in the Town's budget as Intergovernmental Revenues, has also been relatively stagnant. In 2024, shared revenues received by the Town increased substantially due to new legislation. However, aid through the state's shared revenue program is not expected to increase by more than minimal percentage increases, and is expected to only increase by \$14,000 in 2026, according to Department of Revenue estimates. Other state aid has also been relatively stagnant.

The Town currently has outstanding applicable debt of \$1,261,136 for 2024 and available additional debt capacity of \$26,024,449. As discussed above, it is likely that the Town will need to continue incurring additional debt to fund ongoing capital and operational needs.

Additionally, as discussed in the following sections, as a part of the Town's proposed new water system, it is proposing to use the borrowing capacity of the general fund to partially finance the repair (not the reconstruction) of the road network after installing water mains. The Town's

engineer estimates the cost to repair Town streets to be \$14,500,000 while the cost of full width reconstruction of Town streets would be \$21,200,000. Street costs would be even higher if curb, gutter and sidewalks, which currently do not exist, are included.

The Town has stated that it plans to treat 50% of these street costs as a water utility cost and 50% as a general fund cost. If for purposes of this analysis, the Town's assumption that 50% of street repair costs will be covered by the general fund is accepted, that would mean the Town would need to borrow \$7.2 million dollars. That amount alone would represent approximately 26% of the Town's debt capacity. If Town roads are fully reconstructed during the water project, that amount would represent 39% of the Town's debt capacity. If curb, gutter and sidewalks are included, the share of the Town's debt capacity used would be even higher.

As described below in the section regarding construction of the proposed water system, the Town may only be allowed to fund 20% of the street costs as a water utility cost. If this is the case, 80% of the costs, or \$11,715,000, would be covered by the general fund. This amount would represent approximately 43% of the Town's total debt capacity. If Town roads are fully reconstructed during the water project and the Town general fund has to cover 80% of this cost, that would require borrowing \$16,960,000, or 62% of the Town's total debt capacity.

The Town of Campbell does not currently have a credit rating and its most recent debt issuances have utilized the State Trust Fund Loan program for general obligation issuances. The Town's interest rate on the state trust fund loans in 2024 was 6.00%. An additional \$7.2 million in borrowing could raise the Town's debt service expenses by \$500,000-\$700,000 annually. This could be a 100% increase or more in annual debt service. The majority of the debt service increase would likely need to be funded entirely with an increase of the tax levy.

The Town's budgeted property taxes for 2025 are \$1,485,794. An increase of \$500,000-\$700,000 would increase the total tax rate by 34 to 47 percent. The impact to the Town's tax mill rate would be an increase from \$2.61 per \$1,000 home value to between \$3.49 and \$3.84 per \$1,000 home value. If streets are fully reconstructed as discussed above, the tax rate and resulting property tax increases to repay debt would be higher.

### **Limited Services are Provided**

The Town provides only limited services and according to the Town Incorporation Report, the proposed village does not intend to increase the level of services provided.

A full comparison of the level of services provided by the Town and City is detailed in the next Section of this Report. While the Town does provide full-time police protection and garbage pickup, it is undeniable that the remaining services by the Town are what one would expect in a rural town – not an urbanized village next to a metropolitan municipality. Town residents may not appear to object to this low level of services but that is because they are able to – and do – take advantage of the full-range of services provided by the City.

It is not the case, as the Town suggests, that many villages provide a lower level of service than what the Town currently provides. The Town's Incorporation Report at Table 9, page 79,

inaccurately describes the services provided by the villages included in its Table. The Villages of Rochester, Combined Locks, West Milwaukee, and Pulaski all have sewer systems; the difference is that their wastewater is treated by a metropolitan sewerage district rather than a municipal treatment plant. The Villages of Sherwood and West Milwaukee also provide municipal water service. Sherwood purchases water from the City of Appleton and West Milwaukee is served by Milwaukee Water Works. All villages are also required by state law to provide police services; Sherwood, Combined Locks, and Rochester have chosen to contract with the local County sheriff to provide that service. Finally, Kewaskum provides EMS services through a joint partnership with the City of West Bend; Sherwood contracts with the Village of Harrison for Fire/EMS services; West Milwaukee contracts for Fire/EMS services with the City of Milwaukee; and Ellsworth is served by a volunteer Fire/EMS association that is funded by the Village.

The Town is unable to provide its residents a higher level of services because of its existing levy limits. There is also very limited vacant developable land in the Town (only 29 acres) to support new construction that would increase the levy limits. Incorporation would permanently lock the area within the proposed village into a low level of services unless residents passed a referendum to increase the property taxes they pay for operating expenses.

### **Construction of the Proposed Water System Will Increase Property Taxes and Result in High Utility Rates**

#### **Water Rates**

As will be addressed more thoroughly in the next Section of this Report, the Town is proposing to build a new water system. The Town has not fully acknowledged the financial impact on the Town and its residents from constructing this new water system.

The City has retained Donohue & Associates, Inc. and Trilogy Consulting, LLC to review the water system construction application the Town filed with the Public Service Commission of Wisconsin (PSC). The City and its consultants have extensively reviewed the various documents that have been filed with the PSC regarding the proposed new water supply, treatment, and distribution system. The Town's application to the PSC is not yet complete. On October 29, 2025, the Town received an incompleteness determination letter from the PSC along with six pages of detail on the numerous shortcomings and incomplete aspects of the application. A copy of the PSC's incompleteness determination is **Attachment 5**.

One missing piece of the Town's application is an estimate of customer rates based on PSC standard rate-setting methodology. The Town has yet to provide this information to the PSC or its residents. So, at the City's request, Trilogy Consulting prepared an analysis of estimated user rates using standard PSC methodology. Trilogy's Report is **Attachment 6**.

If the Town's cost estimates are used, Trilogy's analysis showed that an average residential customer in the Town would pay \$152.76 per month for water service, or \$1,833.06 per year. This includes fixed charges of \$81.40 per month plus \$14.42 for every 1,000 gallons of water

used. For Class C utilities (those with between 1,000 and 4,000 customers), this amount would be more than twice the amount paid by a similar customer served by any other utility in the state.

Trilogy's rate estimate assumes that the Town will not collect a payment-in-lieu-of-taxes (PILOT) from the utility even though most utilities pay a PILOT to the municipality. This estimate also includes the Town's assumption that it will receive \$17,306,000 in grants. The Town projects these grants would come from a number of sources, including the USDA Rural Development program, the Environmental Protection Agency, and the WI DNR, through its Safe Drinking Water Fund program. Of the total amount of \$17,306,000, the Town assumes it will receive \$5,100,000 from the DNR; however, in the most recent funding list of that program, the Town was not listed as a loan or grant recipient. The Town did not provide documentation that it has been awarded any of the grants listed in its application for construction, as noted in the PSC's incompleteness determination. If the Town receives less grant money than it estimates, the Town will have to rely upon additional loan funding that will drive the cost of water rates higher.

The City also asked its engineering consultant, Donohue & Associates, to review the Town's water system plans and estimates and provide an independent cost estimate. Donohue concluded that several components of the Town's estimated construction costs and operation and maintenance expenses were too low. Donohue independently estimated construction costs to be \$70,297,004. This independent construction cost estimate used the Town's street repair (not replacement) estimate but included only 20% of the cost in the project estimate, consistent with WDNR guidance that allows only 20% of street repair costs as eligible for funding through the Safe Drinking Water Loan Program. Donohue estimated O&M costs to be \$598,973 annually, over \$200,000 more than the Town's estimates. Donohue's Report is **Attachment 7**.

Trilogy also estimated water rates using Donohue's construction and O&M cost estimates. Using these estimates, and still assuming the Town would receive \$17,306,000 in grants, water rates would increase to \$194.40 per month for an average residential customer, or \$2,332.82 per year. This would be comprised of fixed charges of \$101.50 per month and water use charges of \$18.86 per 1,000 gallons of water used. The fixed charge alone would make the proposed system the most expensive in the state for Class C utilities, even before paying for any water used. Using this set of assumptions also means that an additional \$4,455,000 of street repair costs, or a total of \$11,715,000, would be funded by general obligation borrowing and the property tax levy.

If one assumed that the Town would receive only half of the grants it projects, water rates would be over 16 percent higher yet, resulting in an annual average residential bill of about \$2,706.

This analysis demonstrates the financial risks involved in the Town's construction of a new water system. The Town's estimated costs and rosy assumption of substantial grants result in water costs of over \$1,800 a year as a best case scenario. Costs could easily exceed \$2,700 a year or more for water service alone and that does not even take into account the possibility that a third well will be required if the two wells are less productive than hoped.

The proposed utility will likely have the highest water rates in the State of Wisconsin and it will have no ability to substantially grow its customer base to help reduce water rate impacts.

### Sewer Rates

The above analysis does not address the likely increase in the Town's sewer rates. It is unknown the extent to which the Town intends to replace existing sewer mains while constructing the new water distribution system. However, in the City's view, it would be unwise to install new water distribution mains over 70-year-old sewer mains that have demonstrated infiltration and inflow problems.

According to the Town's annual audit, as of the beginning of 2025, the sewer utility had about \$860,000 in reserve funds available for all purposes, including restricted funds.<sup>20</sup> This would not provide adequate funds for even a small portion of sewer main replacement. This means that the Town (or its Sanitary District) would have to issue more debt and sewer rates would need to be increased. The sewer utility would also likely need to pay for a substantial share of street reconstruction under the Town's plan, leading to even higher sewer rates. The Town has not provided any information about the projected cost to replace sewer mains or the anticipated increase in sewer rates.

## **SECTION 2(a) CONCLUSION**

Construction of the proposed water system will greatly increase costs to Town residents. Water utility rates will be the highest in the State for a Class C utility. Sewer rates will increase as debt is issued for old sewer mains to be replaced and tax rates will increase to pay for road reconstruction.

Meanwhile the other services provided by the Town (or proposed village) – like fire protection, parks and recreational programs, redevelopment planning and assistance – would not be upgraded. Levy limit constraints prevent the Town from increasing its tax revenue for operating expenses by more than \$4,000 per year. This, coupled with minimal increases to state aid, makes it impossible for the Town to fund increased expenses to provide a higher level of service typical of a village without a referendum. Incorporation as a village would not change these limitations.

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<sup>20</sup> Attachment 4 erroneously lists the Town's sewer utility net position as the Town sewer utility's fund balance. The correct fund balance is reflected in the Town's annual audit.

## **SECTION 2(b) LEVEL OF SERVICES**

The fourth incorporation standard to be applied is found in § 66.0207(2)(b), Wis. Stats., and requires that:

The level of governmental services desired or needed by the residents of the territory compared to the level of services offered by the proposed village or city and the level available from a contiguous municipality which files a certified copy of a resolution as provided in s. 66.0203(6).

### **SECTION 2(b) ANALYSIS**

The City of La Crosse passed a resolution on February 13, 2025, expressing a willingness to annex the territory proposed for incorporation pursuant to § 66.0203(6), Wis. Stats. This standard then examines and compares the services the proposed village will offer to the services available from the City of La Crosse.

In the 1973 decision, the reviewer concluded that the level of services both existing and potentially available from the City of La Crosse was superior to those proposed by the village. The same conclusion was reached in the 1977 decision. The 1977 decision further explained that:

The territory now needs, by virtue of its population and location, a full range of urban services. A comparison of the services available from the city and proposed by the village shows that the city is capable of providing the services and facilities needed while the village does not offer them or intends to provide only limited services (e.g., volunteer fire department vs. a fully staffed professional fire department). Also, the proposed village does not have (as noted above) the financial resources to provide equal services and facilities at this time.

The same conclusion now must be reached in 2025. In the last 50 years, little has changed in the services that are needed by the proposed village and the services that are able to be provided by the proposed village. As the following analysis will show:

- The City continues to provide a higher level of governmental services than the proposed village offers or will be able to provide.
- The proposed village and its residents already rely on and need the higher level of governmental services provided by the City.
- As noted in section 2(a), the proposed village continues to lack the financial resources to provide commensurate services and facilities.

Consequently, the proposed village cannot meet the 2(b) standard.

## **I. GENERAL GOVERNMENT**

### **Administration**

#### ***City of La Crosse***

The City of La Crosse's full-time Mayor is the chief executive officer of the City and is responsible for supervising and directing the day-to-day operation of city government. To aid the Mayor in these statutory responsibilities, the City of La Crosse has a fully-staffed government containing over twenty departments and divisions, including:

- Airport
- Assessor
- Attorney's Office
- Building & Inspections
- City Clerk's Office
- Engineering
- Finance, including Treasurer's Office
- Fire Department, including EMS
- Human Resources
- Information Technology
- La Crosse Center
- Library
- Mayor's Office
- Municipal Court
- Parks and Recreation
- Planning and Development
- Police Department
- Refuse & Recycling
- Streets
- Transit Utility
- Utilities



Within this structure, the City has 532 full-time employees, 37 permanent part-time employees, 784 limited term employees, and 15 elected officials to provide the high level of services required of a metropolitan community.

The City's breadth and depth of departments and positions ensures that there are multiple layers of internal controls and checks and balances and that each role in the City is filled by dedicated staff who have the levels of education, training, and experience to ensure a well-run government.

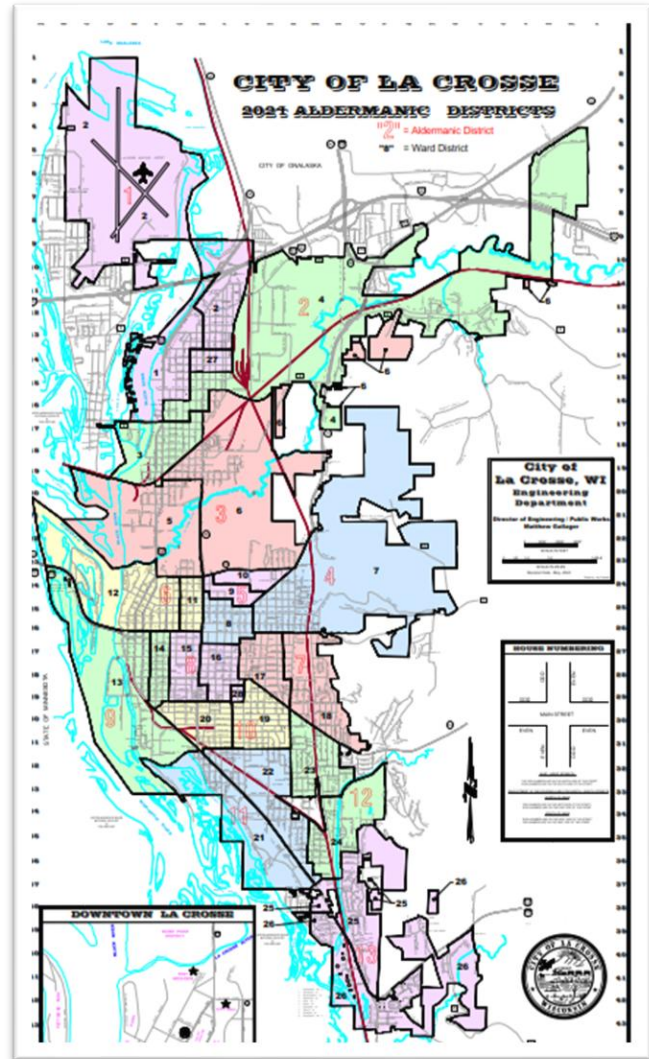
The City's administrative departments (including legal, clerk, human resources, finance) are generally funded through tax revenues and provide their specific services and expertise to the City's other departments, like the Police and Fire Departments, the Municipal Transit Utility, and the water, wastewater, and storm water utilities.



The City is guided by its Mayor and its Common Council, consisting of 13 council members, each representing a district within the City. A map of the City's districts is **Dickinson Exhibit 1**, a portion of which is included right. This structure ensures that each district has a council member who represents their interests on the Common Council.

In addition to the Common Council, the City's government is guided by almost 60 boards, commissions, and committees establishing policies and priorities and providing oversight. A list of these bodies is included in **Elsen Exhibit 1**.

The City's 2025 general government budget, which includes finance, legal, clerk, information technology, municipal court, human resources, planning and community development, assessment, and executive and governing body services is \$14,705,605, which is approximately 21% of the City's general fund budget.



The information in this section is supplemented by the following testimony and exhibits:

- Testimony from Shaundel Washington-Spivey, Mayor of the City of La Crosse, attached as **Washington-Spivey Testimony**.
- Testimony from Tamra Dickinson, La Crosse Common Council President, attached as **Dickinson Testimony and Exhibit**.
- Testimony from Nikki Elsen, La Crosse City Clerk, attached as **Elsen Testimony and Exhibits**.
- Testimony from Daniel DeGier, La Crosse Deputy Finance Director, attached as **DeGier Testimony and Exhibit**.



### ***Proposed Village***

The Town's current administration consists of just one full-time Clerk/Treasurer/Zoning Administrator, one full-time Deputy Clerk/Treasurer/Zoning Administrator and one part-time office assistant. The proposed village "anticipates" that it will expand the part-time office assistant role to full-time as that role will also be responsible for the administrative functions of the proposed municipal water system.

In addition to its employees, the Town contracts with General Engineering to assist in building inspection, building permits, and zoning permits. The Town retains a third-party assessor. The Town does not disclose how it obtains legal services or, outside of administration of payroll and benefits provided by the administrative office, human resources services. The proposed village will continue using this structure.

The Town's general government budget for 2025 is \$523,948, which is approximately 16% of the Town's budget. Rather than increasing the budget to accommodate the growth needs for incorporating, the Town is decreasing its 2026 general government budget to only \$401,896. See Town 2026 Budget, attached as **DeGier Exhibit 1**.

The Town Incorporation Report does not contemplate that the proposed village will budget any additional funds to undertake the work necessary to change from an unincorporated town governed under Chapter 60, Wis. Stats., to an incorporated municipal governed under Chapter 61, Wis. Stats. Outside of expanding the part-time office assistant to full-time to assist with the increased utility responsibilities, the proposed village does not propose adding any other staff, departments, or capabilities. If incorporated, the administrative office will remain responsible for all administrative functions in the proposed village, including village clerk duties, village treasurer duties including all taxing and financial management responsibilities, legal compliance, payroll and benefits, licensing, recordkeeping, reporting, elections administration, zoning, coordination with public works or police for code enforcement, and social media oversight.

The loss of any one of the proposed village's administrative office positions to retirement, termination, or family or medical leave will also place an inordinate burden on the remaining employees to continue providing the myriad of administrative functions imposed on them. This may even be a current concern, as the Town has posted a listing for a new Deputy Clerk/Treasurer/Zoning Administrator. See **Elsen Exhibit 2**.

### ***Comparison of Services – Administration***

The City of La Crosse provides more and higher quality administrative services than the proposed village can or will provide. This is obvious simply from a comparison of the administrative funding, departments, and staffing, as shown on **Table 3** below.

**Table 3**

	<b>Administration Comparison</b>	
	<b>Proposed Village</b>	<b>City of La Crosse</b>
General Government Budget (2025)	\$523,948	\$14,705,605
Full-time employees of municipality	14*	532
Separation of Clerk and Treasurer duties	No	Yes
Full-Time Clerk's Office staff	**	5
Full-Time Treasurer's Office staff	**	17
In-house Legal Department staff	0	6
In-house Human Resources Department staff	0	7
In-house Information Technology Department staff	0	10
In-house Planning and Development Department staff	**	11
In-house Assessors Office staff	0	5
In-house Building and Inspection staff	0	11

\*Proposed village total includes the proposed village's assumption that it will add one employee to the maintenance department and change the part-time administrative position to full-time.

\*\*Proposed village will have 3 administrative employees who perform all administrative functions, including those of the clerk, treasurer, and zoning administrator.

The individual analysis of the various general government functions also shows that the proposed village needs a higher level of services than currently provided. The City has the capacity to provide all of its vast services to the proposed village without material increases in City staff or facilities.

If the proposed village were to annex to the City, current residents would experience significantly higher levels of service and benefit from a City government that has a bench of employees with the education, experience, and training to maximize opportunities and minimize liability.

## Clerk

### *City of La Crosse*

The City of La Crosse's City Clerk's office employs five full-time staff, including one Deputy Clerk, to provide all of the statutorily required duties of a city clerk, including:

- Care and custody of the corporate seal, Municipal Code of Ordinances, and certain City records.
- Provides notice of all Common Council meetings, prepares and maintains minutes of Council proceedings, preserves permanent records of the Council, and provides administrative support for the Council.
- Provides administrative support for City boards and committees, including the Citizens Board of Review, Board of Zoning Appeals, Board of Public Works, and others.
- Performs all functions for the City to issue licenses and permits, including alcohol, certain occupations, outdoor performances, special events, and others.
- Administers local elections, including certifying candidates for the election, establishing polling locations, obtaining and training election inspectors, registering voters, conducting elections, counting votes and reporting results, accepting absentee ballots, coordinating with the La Crosse County Clerk, canvassing after an election, and participating in any recounts. The Clerk's office manages approximately 200 limited term employees that perform work for City administered elections.
- Maintains the City's online and publicly available Legislative Information Center.
- Processes public records requests for City records.
- Provides support to other City staff and assists with inquiries regarding legislation, City records, and City Council, boards and committees.
- Maintains the City's Municipal Code, available online.

In addition, the Clerk's Office provides training and information to all new council members, mayors, and other committee members regarding meeting procedures and other City processes, and ensures the Citizens Board of Review complies with all training requirements under state law. The City Clerk is a certified trainer through the Wisconsin Election Commission for Chief Election Inspector certificate training, and provides necessary training to election officials.

To ensure public transparency and accessibility, the Clerk's Office maintains the City's Legislative Information Center, which is an electronic database housing all legislative information on the City Council, boards and committees, including membership, legislation and history, meetings, agendas, packets, actions taken and more. The public can either live stream meetings or view recordings of them once they conclude. The public can also subscribe to the City's eNotification system to receive information on specific topics. This is all available to the public via a link on the City's webpage or at <https://cityoflacrosse.legistar.com/Calendar.aspx>. An example of the information that can be found in the Legislative Information Center is in **Elsen Exhibit 1**.

The information on the City’s Legislative Information Center is also accessible to members of the public who need assistance. Agendas and minutes are posted in formats that can be read by screen readers.

The information in this section is supplemented by the Testimony from Nikki Elsen, La Crosse City Clerk, attached as **Elsen Testimony and Exhibits**.

### ***Proposed Village***

The proposed village will only employ one person with the combined responsibilities of a village clerk, treasurer, and zoning administrator, and one deputy clerk/treasurer/zoning administrator. The Town’s annual audits continuously flag this lack of segregation of duties as a deficiency in internal control.

### ***Comparison of Services – Clerk***

The City provides a higher level of dedicated municipal clerk services than the proposed village can with a combined clerk/treasurer/zoning administrator. The proposed village has no less duty than the City to provide all the functions of a municipal clerk in compliance with Wisconsin law. However, the proposed village would have an administrative office of just two and one-half individuals to fulfill not just the clerk’s responsibilities, but the responsibilities of treasurer, zoning administrator, and all other general administrative functions. As flagged in its audits, the proposed village needs segregation of duties. The proposed village’s clerk/treasurer/zoning administrator cannot provide the level of dedicated service that the City can provide. The City would already be capable of providing all of the needs of a municipal clerk to the proposed village without adding any additional staff.

A prime example of the City’s superior services is the amount and quality of information included on City’s website which allows residents to be informed about their government, as seen on **Table 4**.

**Table 4**

	<b>Public-Facing Website Capabilities</b>	
	<b>Town of Campbell Website</b>	<b>City of La Crosse Legislative Information Center</b>
Legislative files housed in one location	No	Yes
All government meetings shown in one location <sup>3</sup>	No	Yes
Agendas and Minutes in an accessible format	No	Yes
Meeting packets available online	No	Yes

<sup>3</sup> While the Town of Campbell has an online calendar that lists some of its meetings, not all appear on the calendar. For example, of the five Planning and Zoning Commission meetings that occurred in 2025, only one (October 7, 2025) shows up on the Town’s calendar. See <https://townofcampbellwi.gov/government/planning-and-zoning-committee/> and <https://townofcampbellwi.gov/about/calendar/> (last accessed November 17, 2025).



Live stream meetings	No	Yes
View recorded meetings online	No	Yes

The proposed village does not offer the level of transparency and accessibility to its meetings and meeting documents that the City already provides. For a proposed village with a population that trends 10 years older than the County's population, this is a clear deficiency for accessibility to seniors, as well as any others in the community needing such assistance.

## **Finance Department / Treasurer**

### ***City of La Crosse***

The City's Finance Department, employs 17 full-time employees to handle all responsibilities of the City Treasurer, including oversight of all financial records of the City. In this role, the Finance Department:

- Prepares and presents an annual capital budget and an annual operating budget to the Common Council.
- Prepares annual financial statements for a third party auditor on an annual basis.
- Facilitates and oversees the issuance of all City Debt Obligations.
- Manages the City's investment portfolio.
- Provides payroll services.
- Provides financial management and reporting of TIF districts.
- Provides payment collection services for all revenue sources, including real estate tax bills.
- Provides grant management reporting services and assists in grant management.
- Produces and mails out real estate tax bills.
- Collects real estate taxes for all taxing jurisdictions and distributes the other taxing jurisdictions' portion of collections to them throughout the collection process.
- Establishes and updates all financial and purchasing policies and processes.
- Manages capital asset inventory recording and reporting.

The City also annually prepares a 5-year capital improvement plan that covers both capital projects and capital equipment, and includes the capital budget for the next year. The timing and funding source are identified in the plan to fit within the financial capacity of the City over a five-year period. This has helped ensure that the City's assets are maintained and on a regular replacement cycle, reducing operational costs over the long term.

Staff are required to take annual continuing education to maintain proficiency in financial reporting. Staff are also members of state and national finance officers associations.

The City's Finance Department had a 2025 annual operating budget of \$1,653,151.

The information in this section is supplemented by the Testimony from Daniel DeGier, La Crosse Deputy Finance Director, attached as **DeGier Testimony and Exhibit**.

### ***Proposed Village***

The proposed village will only have one person with the combined responsibilities of a village clerk, treasurer, and zoning administrator, and one deputy performing the proposed village's finance functions. The limited staff and lack of municipal financial reporting knowledge has resulted in the Town's annual audits continuously flagging deficiencies in internal control.

The proposed village also lacks a capital asset plan for long-term planning of capital needs and investments. Instead, the proposed village determines its capital needs on an annual basis.

***Comparison of Services – Finance Department / Treasurer***

The proposed village needs a higher level of services than it can provide, but which the City can. The City has a higher capacity to manage its financial resources and plan for future needs than the proposed village. With a larger and more experienced staff, the City is able to provide a better framework of internal controls with segregation of duties, risk assessment, and monitoring activities. The City also has a staff with specialized experience and training in governmental accounting. The experience and level of staffing would cut down on the risk of fraud and material misstatements, a risk that the proposed village faces. The City also has resources for and experience in administering a formal capital plan and asset/financial forecasting, which the proposed village will continue to lack.

## **Planning and Development**

### ***City of La Crosse***

The City of La Crosse Planning and Development Department plays a central role in shaping the future growth, livability, and sustainability of La Crosse. The Department is involved in both the planning and regulation of development within the City, in accordance with the City's Comprehensive Plan.

Within the Planning and Development Department is the Planning and Development Division, the Assessment Division, and the Building and Inspection Division. In total, the Department employs 27 full-time planning staff members, including 11 in the Planning and Development Division, 5 in Assessment, and 11 in Building and Inspections. The overall 2025 annual budget for the Department was \$2,578,767. An organizational chart for the Planning and Development Department is **Reinhart Exhibit 1**.

The Department is responsible for:

- Developing and updating the City's master plans, including the 2040 Comprehensive Plan (updated in 2023), the La Crosse Bicycle and Pedestrian Master Plan Update, Imagine 2040 Downtown Master Plan, and the 2024 City of La Crosse Housing Study.
- Managing and recommending updates to the City's zoning ordinances and development regulations, including Multi-Family and Commercial Design Review.
- Overseeing 20 City committees, including the Bicycle-Pedestrian Advisory Committee, City Plan Commission, Climate Action Plan Steering Committee, Economic and Community Development Commission, Neighborhood Revitalization Commission and Redevelopment Authority.
- Facilitating public meetings, surveys, and workshops.
- Managing 12 active Tax Incremental Financing Districts in the City.
- Managing grants and incentives with funding through the Capital Improvement Program, Tax Incremental Financing, Community Development Block Grants, and the Wisconsin Economic Development Corporation.
- Providing all assessment services in the City.
- Providing all Building and Inspection services in the City.
- Coordinating with regional transportation, housing, public works, and regional agencies to align local plans with broader regional goals and funding opportunities.
- Enforcing all City zoning ordinances and building codes.
- Providing opportunities for public engagement and input in planning initiatives.

Having Planning and Development, Assessment, and Building and Inspections under the same Department ensures that all stages of development within the City are handled under one roof.

The City's Planning and Development Department is also active in addressing regional problems through regional coordination. The City assists with:



- The Mississippi River Regional Planning Commission and its Comprehensive Economic Development Strategy and Port of La Crosse Harbor Plan.
- The La Crosse Area Planning Committee, the federal designated Metropolitan Planning Organization for the La Crosse region, including its long-range transportation plan, Beyond Coulee Vision 2040.

The rest of this section focuses on the Planning and Development Division, with the Assessment Division and Building and Inspection Division discussed later.

As stated above, the Planning and Development Division has 11 staff members:

- |   |  |
|---|--|
| • Director of Planning and Development        | • Community Development Manager                |
| • Deputy Director of Planning and Development | • Two City Planners                            |
| • Homeless Services Coordinator               | • Neighborhood Housing Development Coordinator |
| • Economic Development Coordinator            | • Housing Specialist                           |
|   | • Program Compliance Specialist                |
|   | • Administrative Specialist                    |

The number and specialization of the City's staff allow it to proactively address opportunities and issues. The Economic Development Coordinator assists in growing local businesses and assisting development projects in order to increase the quality of living and job opportunities. A recent focus has been expanding childcare opportunities. The position also helps create and maintain the City's 12 active Tax Incremental Districts (TID). A prior TID helped create the City's Airport Industrial Park on French Island.

The Community Development Manager and its three full-time staff focus on housing solutions for the City. Working with multiple financing sources, including tax incremental financing, Community Development Block Grant funding, and HOME Program funding, the City works to revitalize neighborhoods, addresses income inequality, and improve the quality of the City's housing. More information about each of these programs is provided below.

Community Development Block Grant. Community Development Block Grant (CDBG) funds are managed by the Wisconsin Department of Administration's Division of Energy, Housing and Community Resources (DEHCR). Entitlement communities received funding directly from the U.S. Department of Housing and Urban Development (HUD). Wisconsin also receives funding from HUD and through its CDBG program awards grants directly to non-entitlement communities - which in the past included both villages and towns. Through these awards, villages and towns can improve public facilities, rehabilitate housing, and promote local business development. Currently, La Crosse County contracts with Couleecap, Inc to manage the CDBG Housing Regions and Small Cities Revolving Loan Program (CDBG-HSG). This program provides funding for home repairs in Southwest Wisconsin.

The City of La Crosse is an entitlement community due to its population being over 50,000 residents and receives an annual allocation of CDBG funds from HUD. These funds must meet

at least one of HUD's national objectives: benefiting low- and moderate-income people, preventing or eliminating slum and blight, or addressing urgent community needs.

The City of La Crosse Planning and Development Department administers the CDBG funds in accordance with the HUD and Common Council approved Consolidated Plan that is updated every five years. The City's CDBG funds prioritize access to quality affordable housing, alleviating poverty, and supporting business development. Locally, these funds support programs such as housing rehabilitation loans, acquisition and redevelopment of dilapidated properties, and assistance for homebuyers. The City also partners with nonprofit organizations to deliver social services that benefit residents with the greatest needs. All programs are available only for properties within the City of La Crosse and primarily serve City residents.

In 2025, the City received \$882,603 in entitlement CDBG funds. The amount of funding a community receives is based on population and poverty level and therefore, it is possible the City of La Crosse could receive additional funds if the current Town of Campbell were to be annexed. These funds would then be available to residents in the Town of Campbell.

HOME Program. The HOME Investment Partnership Program is another HUD program that provides funding to increase affordable housing opportunities. These HOME funds are managed by the Wisconsin Department of Administration's Division of Energy, Housing and Community Resources (DEHCR). The state receives an annual allocation of HOME funds and administers them to support affordable housing initiatives in non-entitlement communities - areas that do not receive HOME funds directly from HUD. In La Crosse County, HOME funds are managed by Couleecap to manage programs like owner-occupied housing rehabilitation and tenant-based rental assistance (TBRA).

The City of La Crosse is an entitlement community due to its population being over 50,000 residents. This means that each year, the City receives an allocation of HOME Investment Partnership Program funds from HUD. The City of La Crosse Planning and Development Department administers the City's HOME program, also in accordance with the City's Consolidated Plan.

The City of La Crosse utilizes HOME funds for the construction of affordable owner-occupied single-family housing through the Replacement Housing program. This happens through partnerships with Western Technical College's Construction & Cabinetry program, Central High School's Construction Academy and Habitat for Humanity of Greater La Crosse. Typically, the City can add 2-3 new homes annually thanks to these partners and the HOME funding. In 2025, the City received \$277,258 of entitlement HOME funding.

Housing Rehabilitation Assistance. The City of La Crosse's housing programs leverage CDBG, HOME, and TID funds to improve access to quality housing within the City. The City has six staff members that work directly with these community and economic development programs. The revolving loan fund consists of approximately \$5 million in funds, with approximately \$600,000 added annually. This supports about 15 existing homes a year, and the construction of two new homes annually.

Additional City resources are available for development in the floodplain through the City's Floodplain Relief Grant Program. This program offers a 50/50 match with a maximum grant of \$40,000 to fund projects such as filling basements, moving home utilities to a higher floor, and even brand-new construction on vacant lots.

Neighborhood Association Support. Though neighborhood associations are intended to be grassroots organizations, the City of La Crosse offers resources and assistance to neighborhoods wanting to create an official association. Neighborhood Associations can be the backbone of thriving, resilient communities where neighbors can get together to know one another, discuss concerns, share ideas, and take action together. They keep people connected and a connected neighborhood is a safer and more supported one.

The City's Planning and Development Department assisted with establishing eleven (11) neighborhood associations in the City. These associations act as a liaison with City Hall and the City's Neighborhood Revitalization Commission to address neighborhood concerns and issues and develop policy. They also assist neighborhoods with making Capital Improvement Project (CIP) requests to make public improvements within their neighborhood. These requests are typically to improve public infrastructure such as playgrounds, street improvements, lighting and bicycle and pedestrian infrastructure. Neighborhood associations make neighborhoods stronger. Strong neighborhoods make cities stronger.

The Planning and Development Division's 2026 budget is \$1,209,664.

The information in this section is supplemented by the Testimony of Andrea Trane, La Crosse Director of Planning and Development, attached as **Trane Testimony**.

### ***Proposed Village***

The Town provides none of the services provided by the City's Planning and Development Division. The Town does not have any Tax Incremental Financing Districts supporting industrial, commercial or housing development or redevelopment. The proposed village is not proposing to add any additional staff to assist it with this opportunity.

There are also no housing rehabilitation programs in the Town of Campbell and there is no evidence the Town has received any CDBG assistance or HOME funding from the U.S. Department of Housing and Urban Development over the past twenty years. The application process typically requires a budget and financing plan, environmental review and market analysis or needs assessment. Technical expertise is essential in these complicated applications. The proposed village is not proposing to add any additional staff to assist it with applying for or utilizing these funds.

There are no established neighborhood associations in the Town of Campbell.

### ***Comparison of Services – Planning and Development***

The City’s Planning and Development Division provides a higher level of services than the proposed village will. The City’s Planning and Development Division employs 11 individuals with specialized education, knowledge and experience in each area. The proposed village lacks these same resources and programs.

**Table 5**

	<b>Planning and Development Comparison</b>	
	<b>Proposed Village</b>	<b>City of La Crosse</b>
Planning and Development Budget (2026)	Unknown	\$1,209,664
Full-time employees	*	11
Utilizes or provides:		
Community Development Block Grant	No	Yes
Housing Rehabilitation Assistance	No	Yes
HOME Program	No	Yes
Neighborhood Association Support	No	Yes
Active Tax Incremental Districts	0	12

If the current Town of Campbell were to be annexed, the properties and residents would be eligible for the services and programs offered by the City.

The City has the staff and resources to utilize available governmental programs to seek and receive CDBG and HOME funds to benefit community residents. This includes resources for developments in the floodplain – an issue in the proposed village as a significant number of households on French Island and Hiawatha Island are within the floodplain (see Town Incorporation Report, Map 03). With a number of lower income homes, the proposed village needs and would benefit from these City services.

In addition, the City has the staff and expertise to assist with development and redevelopment opportunities in the proposed village. To expand its tax base and provide retail and commercial services needed and desired by its residents, the proposed village needs to engage in better planning than it has historically done. The services that the City could provide would include planning for the development and best use of the underutilized I-90 corridor within the proposed village—a gateway to Wisconsin. The City’s Planning Department has technical assistance, policy tools, grant writing skills and community engagement strategies to improve this gateway into Wisconsin. The City has already successfully encouraged development within City property on French Island through its use of TIDs. The existence of other successful TIDs in the City means that the City has available resources to assist with up-front costs.

As the proposed village does not have significant vacant land for development, any new construction will largely be the result of redevelopment. The proposed village does not propose adding any staff with skills or expertise to facilitate this redevelopment. The City already has this expertise. If the proposed village were instead to annex to the City, the City would be able



to utilize its expertise and resources to provide planning and incentives to encourage development and redevelopment in a manner consistent with local and regional needs.

The City is well aware of regional needs due to the City's involvement with a number of regional plans. For example, if the Town were to annex into the City, the City is in the position to help implement the Metropolitan Planning Organization's specific recommended improvements within the Town of Campbell to enhance bicycle and pedestrian safety, including construction of a minimum 4-foot-wide smooth paved shoulder between Goddard Street and Nelson Park, and Clinton-Washburn-Lake Shore-La Crescent Streets. The proposed village simply lacks the expertise, resources, and funding to encourage the right type of development and redevelopment that is needed on the island.

## **Building Inspector**

### ***City of La Crosse***

The City of La Crosse has a Building and Inspection Division under the City's Planning and Development Department. The Building and Inspection Division has 11 full-time staff, including:

- Chief Building Inspector
- Four Building Inspectors
- Plumbing Inspector
- Electrical Inspector
- Chronic Nuisance Technician/Floodplain Manager
- Two Code Enforcement Technicians
- Administrative Specialist

The Chief Building Inspector is responsible for providing training, guidance, and performance evaluations for Building and Inspection personnel and can help develop internal policies to improve efficiency and compliance. The Chief Building Inspector is a regular participant in the City's Commercial and Multi-Family Design Review Committee, ensuring that all building plans and permit applications are reviewed for code compliance.

The Chief Building Inspector also provides staff support to the City's Floodplain Advisory Committee, the Board of Zoning Appeals, and the Building and Housing Appeals Board.

The Floodplain Advisory Committee manages and guides development and policy decisions related to floodplain areas. This ensures that the City remains in good standing with the National Flood Insurance Program and meets FEMA requirements, which can affect flood insurance rates and eligibility for federal funding.

As a City Division, the Building and Inspections Division's staff is intimately familiar with the City and its codes. Staff ensures compliance with zoning ordinances, fire codes, energy codes, and other safety regulations, and issues stop-work orders or citations for non-compliance. They stay up to date on changes in codes and recommend updates to the City's ordinances as needed. The Division provides proof of zoning letters to property owners, developers and other interested parties.

The Division is also frontline in communicating with the public on all matters related to buildings and inspections. The Division is the point of contact for contractors, developers, architects, and the public.

The City has a dedicated Chronic Nuisance Technician/Floodplain Manager, responsible for a variety of code enforcement support functions related to nuisance housing, health and safety, blight, graffiti, garbage and refuse, as well as floodplain planning and management. In addressing potential issues, the Division works closely with other departments, including the Police Department, Fire Department, Engineering and Public Works, Assessors, Utilities, and Legal Department.

The Division utilizes the City's records management software, Energov, which contains every address and parcel number in the County of La Crosse. Permits, orders to correct, and citations can be easily issued from this system, and the system interacts with City devices in the field.

The Division also has a dedicated front desk staff person who provides face-to-face interaction with members of the public and is available five days a week to answer questions about permits and inspections.

The information in this section is supplemented by the Testimony from David Reinhart, La Crosse Chief Building Inspector, attached as **Reinhart Testimony and Exhibits**.

### ***Proposed Village***

The proposed village will not employ a separate zoning administrator but will continue to assign those responsibilities to the combined clerk/treasurer/zoning administrator position, supported by one deputy with the same combined responsibilities. The Town Incorporation Report states that zoning is supported by its contract with General Engineering. General Engineering will also be responsible for issuing building permits within the proposed village.

Currently, the Town relies upon La Crosse County to administer and enforce the statutorily required shoreland-wetland zoning ordinance applicable to the Town. However, the proposed village will have to assume the responsibility to adopt and administer any shoreland-wetland zoning in the proposed village. Administration of shoreland-wetland zoning requires a blend of technical, regulatory and interpersonal skills. Typically, this would be the responsibility of a planner or environmental specialist. The proposed village has not proposed adding any additional employees with these qualifications to assist in administering a shoreland-wetland zoning ordinance. Nor does the Town Incorporation Report detail how the proposed village will finance the creation and adoption of a shoreland-wetland zoning ordinance.

### ***Comparison of Services – Building and Inspection***

The City provides a higher level of service than the proposed village can. By having a dedicated, in-house division, the City provides a one stop shop for permitting and inspection that is open and available to the public. All building inspectors also may be contacted by one phone number and email address. Because of this, the City is able to quickly respond to questions and requests for assistance from members of the public or from City staff needing to address compliance issues. This is a service a third-party contractor cannot provide.

City staff in the Division of Building and Inspection are intimately familiar with the City's needs, problem areas, and codes. This expertise is sorely needed in the Town. The Town's history of limited planning has resulted in poor design choices that will continue to impact the proposed village. For example: a lack of sidewalks, vacant commercial space, and around 10 dead-end streets with no cul-de-sacs or turnarounds, impacting community cohesiveness, traffic flow, and the provision of emergency services. In addition and importantly for the proposed village, the City's Building and Inspection Division also has a dedicated Chronic Nuisance

Technician/Floodplain Manager, two problems that the proposed village faces. The proposed village lacks the staff and resources to have individuals dedicated to resolving these issues.

## **Assessor**

### ***City of La Crosse***

The City has a fully-staffed Assessment Division under the City's Planning and Development Department. The Assessment Division has 5 full-time staff, including the Chief Assessor, a Deputy Assessor, two Appraiser II positions, and one Appraiser I position. All current City assessors hold Wisconsin Assessor II certifications and two also maintain their Wisconsin Assessor III certifications, the highest level of assessor certification in Wisconsin.<sup>4</sup>

The City conducted two recent citywide revaluations in 2022 and 2025, in compliance with the State of Wisconsin Department of Revenue requirements. For the citywide revaluation completed in 2025, the assessor's office achieved a 95.94% equalized ratio that closely aligns assessed values with market values.

The information in this section is supplemented by the Testimony from Shannon Neumann, La Crosse Chief City Assessor, attached as **Neumann Testimony**.

### ***Proposed Village***

The Town contracts with a third-party for assessment services. The proposed village's 2025 budget included \$20,500 for assessment services. The Town Incorporation report contains no information suggesting that the proposed village will alter the kind or nature of its assessment services.

### ***Comparison of Services - Assessor***

The City provides a higher-level of assessment services than the proposed village will. The City has full-time, local assessors who are fully integrated into the community, familiar with neighborhood trends, available for in-person meetings year-round, and are responsive to taxpayers, the public, and city officials.

The Town website provides a phone number for its assessor, but, otherwise, provides no additional information for or in-person access to the public. The proposed village will not provide assessment services with the same level of expertise or availability as the City does.

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<sup>4</sup> See <https://www.revenue.wi.gov/Pages/Training/assessor-certification.aspx> and the Wisconsin Property Assessment Manual (2025), Chapter 2, available at <https://www.revenue.wi.gov/documents/wpam25.pdf>.



## Legal

### *City of La Crosse*

The City of La Crosse Legal Department employs a statutory City Attorney, assisted by five additional employees including the Deputy City Attorney, two Assistant City Attorneys, a Paralegal, and a Legal Assistant, for a total of six full-time staff. The Department is responsible for all matters arising under civil law. The Department:

- Prepares ordinances, resolutions, contracts, legal opinions and other documents as requested by City officers.
- Assists officers and staff in compliance with the Wisconsin Public Records Law and Open Meetings Law.
- Advises on the legal aspects of programs and policies established by the City.
- Implements annual compliance reviews of development agreements and insurance programs.
- Achieves compliance with municipal requirements through municipal court prosecutions and proactive public nuisance abatement in the community by directing the Neighborhood Services Team.
- Serves as general counsel for the Redevelopment Authority.
- Initiates and defends civil litigation.
- Monitors matters assigned to contracted legal counsel.

The Legal Department regularly attends the following meetings:

- |  |   |
|--|---|
| • City Council                           | • Board of Estimates  |
| • Finance and Personnel Committee        | • Board of Public Works   |
| • Judiciary and Administration Committee | • Economic and Community Development Commission                       |
| • City Plan Commission                   | • Ethics Board  |
| • Board of Zoning Appeals                | • Park Board  |
| • Citizens Board of Review               | • Board of Police and Fire Commissioners                              |
| • Employee Benefit Trust Fund Committee  | • Redevelopment Authority   |
| • Human Rights Commission,               | • Various ad hoc committees like the City Administrator Working Group |
| • Boundary Agreement Task Force          |   |
| • Executive Committee                    |   |

In addition, a member of the Legal Department may be called upon to attend a meeting of any governing body in the City.

The Legal Department's close working relationship with City officers, employees, departments and operations allows it to be proactive in managing City problems. This includes the Legal Department's lead on the City's Neighborhood Services Team, which works with various departments to abate public nuisance properties and proactively prevent properties from

becoming public nuisances in the future. This on-going periodic review of property data has resulted in fewer nuisances, lower nuisance enforcement costs, and increased public safety and welfare in the City’s neighborhoods.

The Legal Department’s 2025 budget is \$837,166.

The information in this section is supplemented by the Testimony from Stephen Matty, La Crosse City Attorney, attached as **Matty Testimony and Exhibits**.

### ***Proposed Village***

The Town appears to contract with a law firm to provide services on an as needed basis. In this way, the Town relies upon its staff to recognize when an issue should require legal input and also decide whether contacting its attorney is within budget. The proposed village does not indicate that it will alter the nature of its legal services should the proposed village incorporate. In addition, if the proposed village were to incorporate, it will also need to revise its ordinances, enter into new contracts, and ensure compliance with all the requirements of incorporated municipalities in Wisconsin. The proposed village has not budgeted for or addressed this need.

### ***Comparison of Services – Legal***

The City provides a higher level of services than the proposed village will by having an in-house City Attorney Office experienced in providing legal services to a Wisconsin incorporated municipality. By having multiple dedicated personnel who are regularly involved in City governance and regularly attend the most critical governing body meetings, the Legal Department is able to proactively receive information and provide advice when matters arise.

**Table 6**

	<b>Legal Comparison</b>	
	<b>Proposed Village</b>	<b>City of La Crosse</b>
Full-time employees	0	6
Regular legal counsel attendance at governing body meetings	No	Yes
Regular legal counsel attendance at critical committee meetings	No	Yes
Annual review of municipal contracts	-	Yes
Proactive nuisance property management	-	Yes

## **Human Resources**

### ***City of La Crosse***

The City has a dedicated Department of Human Resources which consists of 7 full-time staff and one limited term employee (LTE). The Department is headed by a Director of Human Resources, a position which requires ongoing training to ensure the department runs smoothly and all new labor laws or other employment developments are maintained and followed. Additional positions include:

- Employee Benefits Specialist
- Employee Safety & Risk Specialist
- Human Resources Assistant
- Two Human Resources Generalists
- Wellness Coordinator
- Human Resources Intern

The HR Department provides human resources services to all of the City, including its various departments and to its enterprise funds like the Water Utility, Wastewater Utility, Municipal Transit Utility, the La Crosse Center, and the Library.

A fully-staffed and in-house Department of Human Resources contributes to the culture and employee satisfaction that the City has curated. The City's Human Resources Department:

- Ensures that there is personalized employee support, including faster and more empathetic response to issues such as conflict resolution
- Fosters communication and trust among employees and management
- Provides faster decision-making that is supported by a team that understands the work environment, team dynamics, and company culture firsthand
- Provides an outlet for confidential sharing and control of employment issues
- Provides long-term cost efficiency by having reduced employee turnover and risk mitigation

The Department also ensures that City employees receive consistent and position-appropriate trainings, that City human resource policies are updated and in line with changing legal requirements, that City funds for training are wisely spent, and that employee grievances are properly handled to foster a good workplace and mitigate potential City liability.

Having dedicated training ensures that there is consistency and standardization of training; better tracking and accountability for employees; alignment of training with City goals and objectives; improved employee development and career growth; and compliance and risk management.

The Department serves as the first line of defense against employment law legal matters, being able to monitor federal, state, and local labor laws. Having the Department allows the City to be proactive, rather than being reactive as many smaller communities do by necessity. By being proactive, the Department can help prevent violations that could lead to fines or litigation.

While not specific to the City's Department of Human Resources, having a wider and deeper bench of employees in all City departments ensures that coverage is available for unexpected leaves like those under qualified family medical leave.

The annual budget for the City's Department of Human Resources in 2025 is \$636,862.

The information in this section is supplemented by the Testimony from Rebecca Franzen, La Crosse Director of Human Resources, attached as **Franzen Testimony**.

### ***Proposed Village***

The Town does not have a human resources department and the budget for the proposed village does not include any funding to retain someone in this field.

### ***Comparison of Services – Human Resources***

The City provides a higher level of human resources support than the proposed village can. The proposed village lacks any dedicated human resources support and has not budgeted to provide this service. This decreases the ability of the proposed village to attract and retain good employees and increases legal risk to the proposed village. The City's Department of Human Resources could provide all of the services it currently provides to City staff to the Town of Campbell if it were to annex to the City.

**Table 7**

	Human Resources Comparison	
	Proposed Village	City of La Crosse
General HR Budget (2025)	-	\$636,862
Full-time employees	0	7
Limited term employees	0	1
In-house staff able to conduct HR related training for employees	No	Yes
In-house staff dedicated to staying up to date with labor laws	No	Yes

## **Information Technology**

### ***City of La Crosse***

The City of La Crosse has an Information Technology Department consisting of 10 full-time staff positions. IT staff includes the following:

- Director of IT
- Deputy Director of IT/Cyber Security Coordinator
- IT Enterprise Services Manager
- IST Assistant
- IT Helpdesk Manager
- IT Business Analyst
- IT Helpdesk/Administrative Specialist
- Network Specialist
- Senior Support Technician
- Systems Analyst & IT Training Coordinator

The IT Department supports every department and enterprise fund in the City (except for the Library), providing both the technology and technical assistance that allows City departments to provide high level electronic services to the public, including communications equipment for police and fire; open meetings support for administration; online payment, permitting, licensing, and facility rental capabilities; GIS capabilities for engineering and utilities; and more.

With cyber threats on the rise, the City views cybersecurity as a vital function. The City's deputy director position includes serving as the cybersecurity coordinator, which includes administering and ensuring security of the City's computer networks and back-end data center infrastructure.

The City's infrastructure includes a fiber optics network that is shared with the La Crosse School District, and connects with the City's various facilities, including on French Island.

The City's IT Department was selected as an EPEAT Award Winner in 2024 and in 2025 for supporting sustainable electronic technology. See **Greschner Exhibit 1**.



The annual budget for the City's Department of Information Technology in 2025 is \$2,649,743.

The information in this section is supplemented by the Testimony from Jacky Greschner, La Crosse Director of the Information Technology Department, attached as **Grescher Testimony and Exhibit**.

### ***Proposed Village***

The Town contracts with a third-party to manage and service the Town's computer, network server systems, and other cyber security. The Town's limited administrative office is tasked with overseeing the telecommunication, wireless phone system, and other related services.



The proposed village will continue to use the same contractor and employees for its information technology. The Town proposed a budget of \$22,000 for technology in 2025.

***Comparison of Services – Information Technology***

The City provides a higher level of information technology service than the proposed village can. Now more than ever municipalities need high levels of information technology service, including a focus on cybersecurity.

The City has an in-house information technology department which provides dedicated professional and qualified staff who more intimately know the City's IT system and can provide faster service than a third-party provider like the proposed village's. This dedicated department also enables the City to support the online services used by the City's other departments and the public. The City dedicates staff time and resources to focus on the critical issue of cybersecurity.

If the proposed village were instead to annex to the City, all of the City's IT capabilities would become available without a material impact on the City's Information Technology Department.

**Table 8**

	<b>Information Technology Comparison</b>	
	<b>Proposed Village</b>	<b>City of La Crosse</b>
General IT Budget (2025)	\$22,000	\$2,649,743
Full-time employees	0	10
In-house cybersecurity coordinator	No	Yes

## **II. PUBLIC SAFETY**

### **Fire and Emergency Medical Protection Services**

#### ***City of La Crosse***

The City of La Crosse is served by the professional City of La Crosse Fire Department. There are 98 full-time firefighter positions and 2 administrative positions within the Fire Department. Of the firefighter positions, 16 are also paramedics and all firefighters are EMT certified. Firefighters are on duty 7 days a week, 24 hours a day. There are three shifts each with approximately 23-24 fulltime firefighters/EMTs and at least 1 paramedic, all led by a Battalion Chief. Additional firefighter or paramedic staffing is added for certain shifts or events. Eighteen (18) members are part of the Department's Water Rescue Team and 3 members of the Fire Department are members of the La Crosse County dive team. Twenty-three (23) members are part of the Department's Regional Hazardous Material Team and Radiological Field Team. Eighteen (18) members are also part of the Department's Urban Search and Rescue Team. An organizational chart for the Fire Department is attached as **Schott Exhibit 2**.

The City's Fire Department is one of only 300 fire departments in the United States to have achieved classification as an accredited fire agency through the Commission of Fire Accreditation International, and has held this accreditation since 2014.

The La Crosse Fire Department has an ISO class 2 rating and is actively working towards achieving an ISO class 1. The Department's 2024 La Crosse Fire Department Community Report, attached as **Schott Exhibit 5**, provide details about the Department's activities in 2024.

The City has four fire stations located throughout the City to provide quick and efficient emergency response, with its headquarters in the newly built and centrally located Station #2. The northern-most Station #4 is also newly constructed and is located near Northside Elementary School, Logan Middle School, and Logan High School. The Department also has its own training facility in the City. A map of the station locations and the Department's 6-minute service areas is attached as **Map 12** (also **Schott Exhibit 1**).



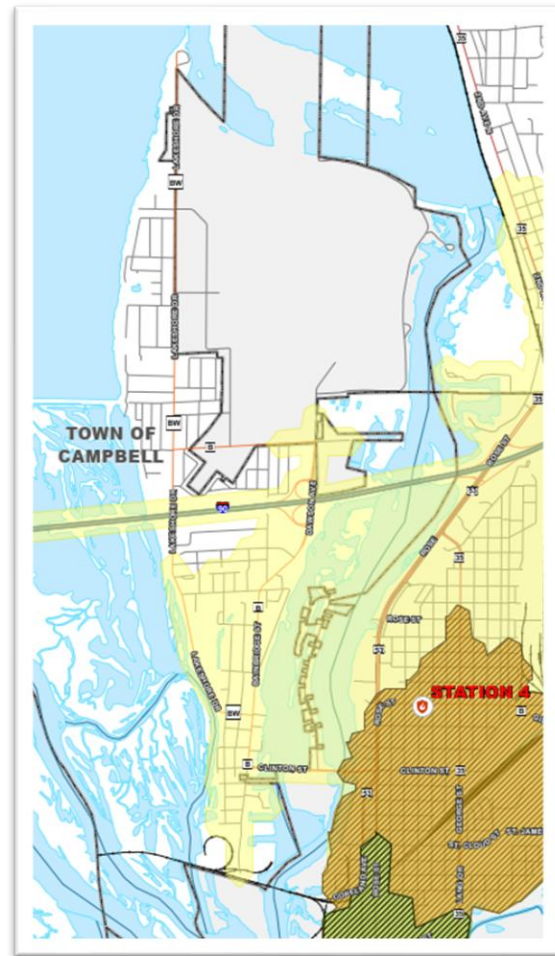
As 54% of French and Hiawatha Islands are within the City of La Crosse, the City already provides fire protection services on the north and south ends of French Island and on Hiawatha Island, and is familiar with the proposed village.

The La Crosse Fire Department's average response time in 2025 is 5 minutes 44 seconds. The response time is under 6 minutes for 86% of the call outs. See **Map 12**. The apparatus response time is under 9 minutes for 90.93% of the call outs. The unit average turnout time is 87.09 seconds. It is important to mention that response times are measured in effective response force, which is personnel with appropriate suppression apparatus. A reported response time is not based solely on the first arriving unit, such as a Chief's vehicle or for a volunteer fire department, a volunteer in a private vehicle. See **Schott Testimony**, p. 19-20. In dedication to public transparency, the Department maintains and reports its performance metrics on the Department's website.<sup>5</sup>

The La Crosse Fire Department's Fire Station 4 response time area of six minutes or less includes all of Hiawatha Island and almost all of the area south of and including I-90 on French Island. See the portion of **Map 12**, right, showing these areas. It also includes the immediate area around the intersection of Dawson Avenue and Fanta Reed Road, on the southeast corner of the Airport. This ability to respond quickly is supported by the City's traffic signal preemption system, which turns the traffic signal green for approaching fire vehicles and the signals red for all other directions.

The Fire Chief administers and directs all programs of the Fire Department, which include fire suppression operations, emergency medical services, fire prevention efforts, community risk reduction strategy, code inspection and enforcement, and a broad range of technical rescue response services. The position also requires the Fire Chief to respond to significant fires and emergency calls for assistance and that can include assuming the role of Incident Commander at complex incidents. The Fire Chief also is the Emergency Management Director for the City of La Crosse. In that capacity, the Chief is responsible for coordinating and implementing the City's Emergency Operations Plan upon the declaration of an emergency, including natural disasters, like tornados, floods, blizzards, and sinkholes; health emergencies, like pandemics such as covid-19; and man-made disasters such as fires and explosions, plane crashes, and train derailments.

**Portion of Map 12**



<sup>5</sup> <https://www.cityoflacrosse.org/your-government/departments/fire-department/department-performance-and-pertinent-documents/iso-accreditation/fire-department-performance-statistics>

The Department is grouped into three divisions: 1) Fire and Rescue Operations Division; 2) Training and Professional Standards Division; and 3) Community Risk Management/Fire Marshal Division.

**Fire and Rescue Operations Division.** The Fire and Rescue Operations Division is responsible for addressing all hazards and emergencies within the community. The division includes the Department's Urban Search and Rescue Team, Water Rescue Team, Hazardous Materials Team, and Radiological Field Team. The Division includes the Department's EMS services, overseen by a Captain – EMS Coordinator. The Department provides pre-planning and EMS standby for major events in the City, including Oktoberfest and the WIAA State Track Meet.

The Urban Search and Rescue Team (USAR) is specially trained to respond to emergencies involving structural collapse, confined spaces, rope rescue, trench rescue, tower rescue, and major extrication or disentanglement. The Team also provides statewide services through an agreement with Wisconsin's Department of Military Affairs – Division of Emergency Management. It has a heavy rescue apparatus, which is a 33-foot Pierce Saber that carries specialized equipment for rope and tower rescue, confined space, and structural collapse incidents. It also utilizes the Department's UTV.

The Water Rescue Team is specially trained in water rescue operations, including ice rescue, sonar technology, boat operations, underwater camera usage, swiftwater rescue, and water-based emergency medical services. It utilizes the Department's three boats and other specialized equipment.

The Department also provides larger regional services through its Hazardous Materials Team and Radiological Field Team, which respond to chemical spills, leaks, explosions, and other hazardous incidents within and around La Crosse. The Hazardous Materials Team was established by the State's Department of Military Affairs – Division of Emergency Management and operates and is funded pursuant to a contract with the State of Wisconsin. The team also serves as the Radiological Field Team which was established and is funded by contract with the State of Wisconsin Department of Health.

Each specialized team receives specialized training specific to their areas of incident response.

**Training and Professional Standards Division.** The Training and Professional Standards Division is responsible for ensuring that the Department's firefighters achieve high standards of training, professionalism, and conduct. National associations and regulations require a minimum 20 hours of training per month, which the La Crosse Fire Department consistently exceeds. Specialized training is also provided in technical rescue, hazardous materials handling, water and dive rescue, and tactical emergency medical support. The Division includes a Battalion Chief, a Captain – Suppression Training Coordinator, a Captain – EMS Coordinator, and three EMS trainers.

**Community Risk Management/Fire Marshal Division.** The Community Risk Management/Fire Marshal Division implements a Community Risk Reduction (CRR) program that enables the Fire Department to evolve beyond traditional fire service to a comprehensive,

all-hazard emergency response system. CRR focuses on proactive prevention and mitigation strategies to reduce risks before they become crises. The Department has a dedicated Community Risk Education Specialist position in support of CRR. The Department averages over 70 events yearly under this program, including Fire Prevention Week visits to every K-5 classroom in the City of La Crosse. The Specialist does outreach to the unsheltered population and works to provide safe shelter in emergencies. The Division also is responsible for fire cause and origin investigations for all fires that exceed \$500 in damages, are suspicious in nature, have an unknown origin, cause a fire-related injury or death, or are deemed necessary by the investigation unit. The Division also performs annual occupancy and fire life safety inspections for all commercial properties and residential properties with more than three units. The Division includes three trained fire investigators, a Division Chief, a Captain, and a Lieutenant.

In addition to its community events and outreach, the Department has a “Safety in 60 Seconds” website that promotes safe practices and provides quick education to help reduce risk in the community.<sup>6</sup> It includes CPR, fire safety, and water safety videos, checklists, and toolkits.

The Fire Department has 8 primary response units, including 3 fire quint<sup>7</sup> vehicles, 2 fire engines, 2 light rescue vehicles, and 1 battalion vehicle as an incident commander vehicle. The Fire Department also has 1 heavy rescue apparatus, the 33-foot Pierce Saber. The Department also has medical bicycles and a Utility Terrain Vehicle, which can be used for events with large crowds and bluff rescue. In addition, the Department has 3 boats that assist with water rescue operations, with 2 always hooked up to vehicles and kept at Station #4. These two include a smaller swift water rescue boat and a larger fire boat with pump capability. The Department also has a dry land access vehicle and two drones. A full list of all of the Department’s equipment is attached as **Schott Exhibit 3**, which includes both primary response equipment and backup equipment.

While not a City resource, the City has a contract with Tri-State Ambulance, Inc. to house and staff an ambulance from Fire Station #1. See **Schott Exhibits 14-15**. Under the agreement, La Crosse Fire Department firefighters/paramedics staff the ambulance according to an agreed upon schedule by the Fire Department and Tri-State Ambulance. This allows Tri-State to provide appropriate staffing to its ambulance services, while also enabling the Fire Department’s EMTS and paramedics opportunities to utilize their skills and maintain their licenses and certifications.

The City’s Airport has its own fire department, located at the Airport, with its own fire equipment apparatus, including two Aircraft Rescue Fire Fighting vehicles, and it is responsible for responding to incidents at the Airport. Contrary to the Town Submission’s assertions, any emergency preparation and response services for the Airport are provided by the City of La Crosse. The City of La Crosse has incident command for any events, such as Airfest, at the Airport. Given its location, the Town of Campbell may be invited to participate in the planning stages for events, but the Airport is the City’s jurisdiction.

The City has a number of mutual aid agreements with surrounding communities for fire, EMS, law enforcement, and other emergency services, including where the City will respond to fires

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<sup>6</sup> <https://www.cityoflacrosse.org/your-government/departments/fire-department/safety-in-60-seconds>

<sup>7</sup> A fire quint is a quintuple combination pumper that combines the functions of a ladder truck and a fire engine.

without compensation for personnel time. (See **Schott Exhibits 18-19**.) This has included responding to calls in the Town of Campbell. (See **Schott Exhibit 20**).

The 2025 operating budget for the Fire Department was \$13,241,336. That makes the annual cost per resident in La Crosse approximately \$259.38.

The information in this section is supplemented by the Testimony from Jeffrey Schott, La Crosse Fire Chief, attached as **Schott Testimony and Exhibits**.

### ***Proposed Village***

The Town has a volunteer fire department to provide fire and EMS service in the Town. The Town Incorporation Report does not indicate what training its volunteer firefighters undergo, what advanced firefighting services the department does or does not provide, or whether its volunteer force includes any trained paramedics. However, the department's website lists no certified paramedics and indicates that only some of its firefighters are certified EMTs.<sup>8</sup> The proposed village will retain the existing all volunteer fire department.

Unlike the La Crosse Fire Department, the Town of Campbell Fire Department is not accredited and is unlikely to meet the accreditation requirements. It is hard to meet the standards of cover requirements and effective response force alarm progressions with a volunteer fire department.

The department's fire station is part of the Town Hall building. It has 2 engines, 2 tenders, 1 vehicle identified as "TAC 1 – Ultra High Pressure," 2 rescue vehicles, 2 boats, and utilizes some shared equipment with the Campbell Police Department.

The department is part of the La Crosse County Fire Department Mutual Aid Agreement (see **Schott Exhibit 18**)<sup>9</sup>, has a separate mutual aid agreement the City of La Crosse, has a limited mutual aid agreement with the Wisconsin DNR<sup>10</sup>, and is part of two regional mutual aid groups. While the Town's Insurance Services Office (ISO) rating is currently a class 3, having increased from a 7 to a 3 in December of 2016, this increase was shortly after the mutual aid agreement with the County was signed in September of 2015. Without a water system and a reliable system of fire hydrants in a suburban demographic, it is likely that the Town leveraged the mutual aid response from the City and other municipalities to bolster its scores. See **Schott Testimony**, pp. 22-23.

The 2025 budget of the Town's Fire Department is \$77,875.00.

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<sup>8</sup> See Members page of the Campbell Fire Department website, available at <http://www.campbellfd.com/members.htm>

<sup>9</sup> This County Mutual Aid Agreement is between the Cities of La Crosse and Onalaska, the Villages of Bangor, Holmen, and West Salem, and the Towns of Campbell, Farmington, and Shelby. The City of La Crosse has the largest and best equipped fire department of any of the participants and has licensed paramedics on staff. Any party may withdraw from the agreement with 30 days' notice.

<sup>10</sup> The DNR mutual aid agreement (Town Incorporation Report, Exhibit 28) is primarily targeted at fighting forest fires, but provides that the DNR will assist the Town "when resources are available." Notably, Wis. Admin. Code § NR 1.23 already requires the DNR to assist all local governments in fire emergencies whenever possible.



### ***Comparison of Services – Fire Protection***

The City of La Crosse Fire Department provides a higher level of service than the proposed village's volunteer fire department can provide. The City has professional firefighters who are all EMT certified, can field more firefighters, has certified paramedics, and has a wide range of specialty services and equipment. As proven by repeated past incidents within the Town of Campbell, the proposed village needs the services that the City provides.

**Table 9**

	<b>Fire and EMS Comparison</b>	
	<b>Proposed Village</b>	<b>City of La Crosse</b>
Department Budget (2025)	\$77,875	\$13,241,336
Firefighters		
Full-time Professional Firefighters	0	98
Volunteer Firefighters	25	N/A
Firefighters Certified as Paramedics	-	16
All firefighters EMT certified	No	Yes
Administrative Staff	0	2
Average Response Time (2025)	-	5 mins 44 secs
Unit Average Turnout Time	-	87.09 secs
Accredited Fire Agency	No	Yes
ISO Rating	3*	2
Fire Stations	1	4
Fire Training Facilities	0	1
Advanced Services (Team Members)		
Community Risk Education Specialist	No	Yes (1)
Trained Fire Investigators	-	Yes (3)
Water Rescue Team	Yes**	Yes (18)
Urban Search and Rescue Team	No	Yes (18)
Hazardous Materials Team	No	Yes (23)
Radiological Field Team	No	Yes (23)

\*This ISO rating, as described above, was likely obtained due to the mutual aid agreement with the City of La Crosse and other municipalities.

\*\*The Town Incorporation Report indicates that the volunteer department has a water search and rescue team, but does not detail its level of training or capabilities.

In addition to providing a higher level of service with professional firefighters, accreditation, facilities, and the provision of advanced services, the City of La Crosse also has a broader range of apparatus at its disposal, as shown on **Table 10** below, with one important caveat: the effectiveness, efficiency, and appropriateness of apparatus cannot be boiled down to a simple table. Combined with **Schott Exhibits 3 and 4**, what the table does show is that the City of La Crosse has the types of equipment that are necessary to provide adequate fire protection for an urban area like the proposed village that has industry with a high risk for, and a history of, conflagrations.

**Table 10**

	Fire and EMS Equipment	
	Proposed Village	City of La Crosse
Fire Quints (ladder truck / engine)	0	3
Engines	2	5
Tenders (not engines)	2	0
Light Rescue Vehicles	2	2
Medium Rescue Vehicle	1	0
Heavy Rescue Vehicle	0	1
Battalion Field Command Vehicle	0	1
USAR Heavy Rescue Apparatus	0	1
Dry Land Access Vehicle MRAP	0	1
Hazmat Truck and 24 Foot Trailer	0	1
Other Vehicles, including SUVs and trucks	1	>12
Trailers	1	9
UTV	0	1
Water Rescue Boats	2	2
Fire Boat with Pump Capacity	0	1
Drones	Yes	Yes (2)

The proposed village will continue to require the higher level of professional services provided by the La Crosse Fire Department. For example, in the industrial area of the proposed village, two companies (J.F. Brennan Company and Omaha Track) are high value operations and one of those companies (Omaha Track) poses a high fire risk. This is not hypothetical - since 2000, there have been three fires at the Omaha Track property (2003, 2015, and 2024). News articles describing the three fires are attached as **Schott Exhibits 9-11**.

Most recently, on October 1, 2024, at 1:30 a.m. the City of La Crosse Fire Department responded to a large industrial fire at 505 Bainbridge Street, resulting in an over 20-hour incident when thousands of tons of railroad tires were engulfed in flames. The City's Fire Department and the Town's volunteers were dispatched at the same time as La Crosse County did not know the specific location of the fire at the time of dispatch. The City dispatched two engines and eight other vehicles to the fire. Fighting the fire depended on the City's staff, the City's water, and the City's specialized equipment that the proposed village does not and cannot provide (see photographs below).

Water from the City of La Crosse Water Utility had to be used to fight and extinguish the fire via a City fire hydrant located on Bainbridge Street. As discussed in more detail in the Water Utility section, the proposed water system for the proposed village would not have been sufficient to fight this fire, and, once disconnected from the City, the proposed village will lose access to the City's water system. Notably, in spite of there having been two prior fires within the last 20 years, the Town has apparently done nothing to address either the risk of these repeated fires or the preparedness of the Town to fight the fires without relying on the City.



*Photos of City of La Crosse apparatus battling the October 1, 2024 tie yard fire*



The City responded to at least 13 other calls for service to the Town of Campbell over the last 10 years. See **Schott Exhibit 20**. Conversely, to the best of the La Crosse Fire Chief's knowledge and his review of mutual aid, the City has never requested assistance from the Town of Campbell Volunteer Fire Department.

1Because of a lack of boundary clarity on French Island, the City also gets calls to respond to structure fires, vehicle fires and accidents, and grass/tree fires—either directly by residents who are confused as to who to call or by officials in the Town. For example, one such structure fire, on September 27, 2021, was a direct call to the City’s Fire Department due to the caller believing the property at 1114 Bainbridge Street was in the City. Another example was on May 29, 2018, when the Town of Campbell’s Chief of Police called the City’s Fire Chief directly for assistance at a fire at 1718 La Fond Avenue in the Town of Campbell.

Response time is critical and can make the difference between partial and total loss and life and death. When the La Crosse Common Council President lived in the Town of Campbell years ago, she saw her neighbor’s house go up in flames as a complete loss. She feels this would not have occurred if the Town had a professional fire department like the City’s. See **Dickinson Testimony**. Even more tragically, one of the La Crosse Fire Department’s Division Chiefs lost his son and niece to a housefire in the Town, an outcome that may have been prevented with a professional fire department. See **Schott Exhibit 17**.<sup>11</sup> The City recognizes that not every loss is preventable, but the ability of the City to turnout a unit in 87.09 seconds and have an effective response force at fires in under 6 minutes for 86% of the call outs will save lives.

Despite its clear needs, the Town refused to take part in a recent report by the Wisconsin Policy Forum (WPF) on exploring fire and EMS service sharing opportunities in the La Crosse County Region.<sup>12</sup> A copy of the WPF Report is **Attachment 8**.

The Town of Campbell already relies upon the professional City of La Crosse Fire Department to provide the fire protection that the proposed village needs.

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<sup>11</sup> The City’s Division Chief consented to Chief Schott sharing his story to support better fire protection for all citizens regardless of where they live.

<sup>12</sup> The Report is also available at [https://wispolicyforum.org/wp-content/uploads/2020/12/SomethingInCommon\\_FullReport.pdf](https://wispolicyforum.org/wp-content/uploads/2020/12/SomethingInCommon_FullReport.pdf). See also the News8Now, February 2, 2021, story on the Report, available at [https://www.news8000.com/news/local-news/la-crosse/fire-power-report-suggests-la-crosse-county-fire-and-ems-combine-resources/article\\_f62aeab8-062e-5dd4-bec1-664dc8b73c37.html](https://www.news8000.com/news/local-news/la-crosse/fire-power-report-suggests-la-crosse-county-fire-and-ems-combine-resources/article_f62aeab8-062e-5dd4-bec1-664dc8b73c37.html).

## Police Protection

### *City of La Crosse*

The City of La Crosse Police Department is a full-service police agency with 138 employees, including 100 sworn employees protecting and another 38 civilian staff serving the City of La Crosse. The ratio of sworn officers per 1,000 residents in the City of La Crosse is 1.9 which is slightly higher than the average ratio of 1.7 for comparable 2<sup>nd</sup> class Wisconsin cities, and higher than the proposed village's ratio of 1.4. La Crosse has officers on duty 24 hours a day, 365 days a year.

**Table 11**

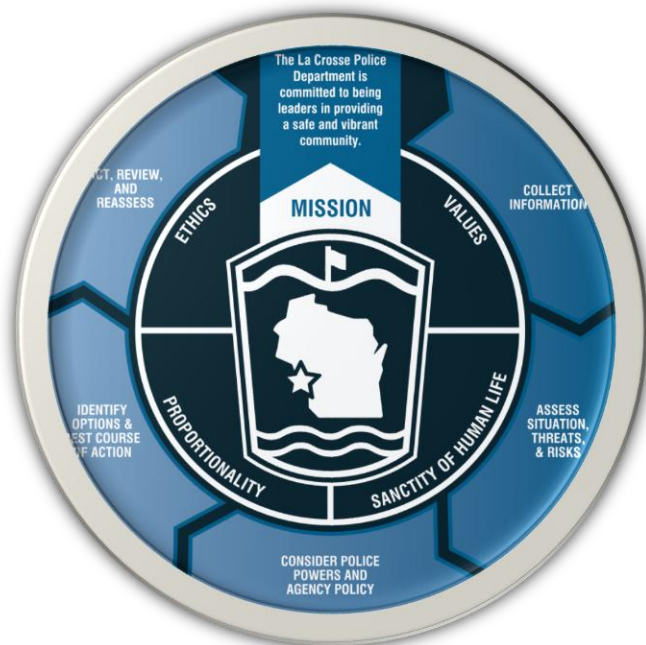
Civilian—Police		Sworn Personnel	
Records Supervisor	1	Chief of Police	1
Crime Analyst	1	Assistant Chief	1
Property & Evidence Technician	1	Police Captains	4
Animal Control Technician	1	Police Lieutenants	5
Clerical	6	Police Sergeants	13
<b>Total Civilian—PD</b>	<b>10</b>	Police Investigators	7
		Police Officers	69
		<b>Total Sworn</b>	<b>100</b>
Civilian—Parking Utility		<b>Total Civilians</b>	<b>32</b>
Parking Utility Coordinator	1		
Parking Utility Maintenance	3		
Community Service Officer	15		
Clerical	3		
<b>Total Civilian—PU</b>	<b>22</b>	<b>Total Staff</b>	<b>132</b>

A breakdown of the Department's staff is shown on **Table 11**, which is part of the Department's organizational chart attached as **Kudron Exhibit 1**, pp. 12-13.

The City of La Crosse Police Department employs officers trained in modern community policing standards, including:

- Active Bystandership for Law Enforcement (ABLE) standards for training and accountability (the Department being only the third department in Wisconsin to accept ABLE standards)
- Critical Decision-making Model (CDM)
- Medical-Behavioral Emergency (MBE)
- Pursuit Practices
- Crisis Intervention Training (CIT)
- Mental Health First Aid (MHFA)

See **Kudron Testimony** pp.4-6.





The Department has been accredited by the Wisconsin Law Enforcement Accreditation Group (WILEAG) since 1995. In April 2024, the Department went through the arduous re-accreditation process, to remain one of the only 8% of Wisconsin law enforcement agencies that are accredited.<sup>13</sup>

The Department provides advanced services including a fully staffed detective bureau, specializing in white collar crime investigations, narcotics and vice investigations, and sensitive crime investigations including juvenile, elderly, and domestic violence. The bureau's members are also trained in homicide and major case investigations. The Department also has membership on the FBI/ICAC Task Force, ATF Gun Crime Task Force with special training in and access to the National Integrated Ballistic Information Network (NIBIN), and Domestic Abuse Reduction Team (DART). See **Kudron Testimony** pp. 7-8.

The Department provides additional advanced services including UAR (Drone) Response Team, Emergency Response Team (ERT), Special Events Team (SET), K-9 Unit (consisting of both tactical canines and therapy canines), Boat Patrol, Animal Control, Parking Utility, Police Reserve Unit, and Police Explorer Unit (providing La Crosse area high school students with hands-on career exploration). The City operates a Drug Drop Box and Drug Take-back Day. See **Kudron Testimony** pp. 8-9.

The City of La Crosse Police Department provides Neighborhood Resource Officers (NROs), Community Resource Officers (CROs), School Resource Officers (SROs), and Investigators providing specialized police services. This commitment to community policing encourages proactive interventions and active engagement with the community. See **Kudron Testimony** pp. 10-11. This community engagement is supplemented by the Department's active presence on social media, with over 33,000 followers on Facebook alone.<sup>14</sup>

All public and private schools within the City of La Crosse are served by the Department's SRO program, which has four SRO's specially trained to work effectively with youth. See **Kudron Testimony** pp. 12-13. While the SRO program is not available to Summit Elementary as it lies within the proposed village outside of City limits, current Town of Campbell children attending middle school, high school, or private schools within the City directly benefit from the SRO program. City SROs occasionally visit the Town of Campbell to assist in welfare checks, providing notice to the Town of Campbell Police Department when doing so.

The larger staff allows the Department to have a Records Division consisting of eight employees overseeing all aspects of the records maintained by the Department and a Property & Evidence Technician trained in P&E cataloging, storing, disseminating, and destruction, ensuring that the Department is in compliance with applicable laws and regulations.

The Department's fleet consists of 19 marked squad cars, numerous unmarked vehicles, 1 specially outfitted vehicle for the humane confinement and transport of animals, 10 parking enforcement and maintenance vehicles, a BEARCAT armored response vehicle, an MRAP

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<sup>13</sup> See <http://www.wileag.info/full-accreditation.html>

<sup>14</sup> See <https://www.cityoflacrosse.org/your-government/departments/police-parking/about-lcpd> and <https://www.facebook.com/lacrossepolice>.



armored response vehicle, two ProMaster vans for special response and prisoner transport, a patrol boat, bicycles, and UARs (drones). The Department also employs Body Worn Cameras, Automated License Plate Readers, and a robust downtown and high traffic area camera system.

The City of La Crosse Police Department provides all law enforcement coverage for properties on French and Hiawatha Islands within City limits, including the La Crosse Regional Airport. In addition, from January 1, 2023 through October 19, 2025, the La Crosse Police Department responded to the Town of Campbell 440 times. Of these calls, 199 were a direct result of the Town of Campbell asking for City of La Crosse Police Department assistance, or because the Town of Campbell or La Crosse County Sheriff's Office was unable to respond to a call for service.

As part of patrolling existing City owned property on French and Hiawatha Islands and providing aid to the Town of Campbell Police Department, the La Crosse Police Department is already operating within the Town of Campbell's jurisdiction on a routine basis. To serve the entirety of the proposed village with the same higher level of service provided by the City, the Department would only need to add three additional officers and one fully-equipped squad car.

The Department's operating budget is over \$13.9 million dollars for 2025. This equates to an expenditure of approximately \$269 per person.

The information in this section is supplemented by the Testimony from Shawn P. Kudron, La Crosse Chief of Police, attached as **Kudron Testimony and Exhibits**.

### ***Proposed Village***

The Town currently has six full-time police officers that would serve the proposed village. The ratio of sworn officers per 1,000 residents in the Town of Campbell is 1.4. The 2025 budget of the Town's Police Department is \$811,776.95. This equates to an expenditure of \$189 per person.

The Town Incorporation Report lists only limited additional offerings of the Campbell Police Department, including a drug drop box/takeback, a drone program, a K9 program, and a police reserve program. Outside of one officer trained in investigating Internet Crimes Against Children, the Town does not state that its officers have any of the training necessary for a metropolitan community provided by the City of La Crosse Police Department.

### ***Comparison of Services – Police Protection***

The City of La Crosse Police Department provides a higher level of service than that provided by the much smaller and more limited police department that would serve the proposed village. See **Table 11**, on the next page. The proposed village is an urban community, located on a major interstate river, and with a U.S. interstate running through the middle of it and faces urban problems.<sup>15</sup> The proposed village needs the level of urban policing services that the City

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<sup>15</sup> See **Matty Testimony**, pp. 6-7 and **Matty Exhibit 4** regarding drug and prostitution issues at the Town's Norwood Inn.

provides. The City is able to provide this needed service by virtue of its number of employees, type and amount of equipment and other resources, high level of education, training and expertise, and, overall, the specialization available in a larger agency.

**Table 11**

	Police Department Comparison	
	Proposed Village	City of La Crosse
Police Department Budget (2025)	\$811,776.95	\$13,931,995.00
Number of sworn officers	6	100
Ratio of sworn officers per 1,000 residents	1.4	1.9
Number of civilian staff	1 (part time)	38
WILEAG Accredited	No	Yes
Advanced Services		
Fully Staffed Detective Bureau	No	Yes
Emergency Response Team	No	Yes
Special Events Team	No	Yes
Animal Control	No	Yes
Neighborhood Resource Officers	No	Yes
Community Resource Officers	No	Yes
School Resource Officers	No	Yes
K-9 Unit	Yes	Yes (Tactical and Therapy)
UAR (Drone) Capabilities	Yes	Yes
Water Patrol Unit*	No	Yes
Bicycle Patrol Unit	No	Yes
Police Reserve Unit	Yes	Yes
Police Explorer Unit	No	Yes
Parking Utility	No	Yes
Drug Drop Box	Yes	Yes
Drug Take Back	Yes	Yes
Dedicated Records Division	No	Yes
Equipment		
Marked Squad Cars	4	19
Unmarked Vehicles	1	Numerous
Animal Transport Vehicle	0	1
Armored Response Vehicles	0	2
Prisoner Transports	0	2
Patrol Boats	0	1
Parking Enforcement Vehicles	0	10
Body Worn Cameras	Unknown	Yes

### III. SOCIAL SERVICES

#### Parks, Recreation and Forestry

##### *City of La Crosse*

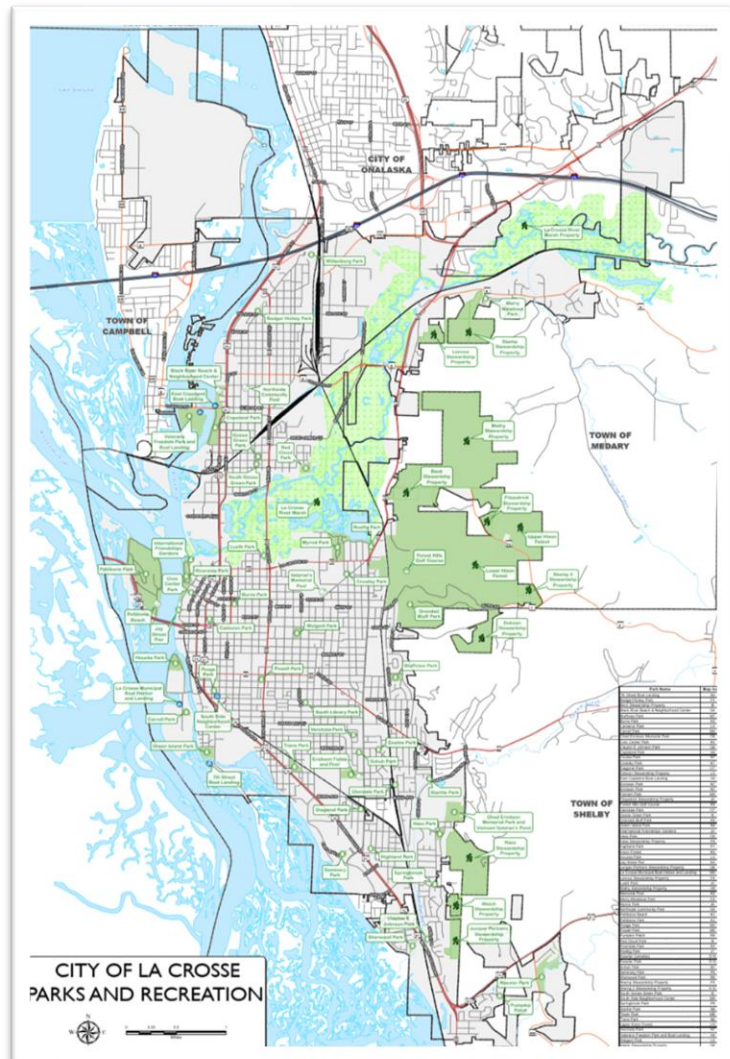
The La Crosse Parks and Recreation Department manages and maintains the City's extensive parks, other public lands, and facilities, including the La Crosse Center. Among Parks, Recreation, Forestry, and Facilities, there are 23 full-time staff and up to 200 part-time employees. A copy of the Department's organizational chart is attached as **Odegaard Exhibit 1**.

The La Crosse parks and recreation system serves the 51,000 residents of the City of La Crosse as well as many of the 35,000 persons living within a 15 mile radius of the City. The City has numerous sites totaling about 1,560 acres of park land. These sites include 47 public parks, 18 shelters, 12 athletic fields, 27 miles of paved trails, 45 miles of natural surface trails, 2 beaches, 3 public pools, 5 boat launch facilities, 3 harbors/marinas, 36 playgrounds including 4 with splash pads, 4 fishing piers, 3 ice skating rinks, 3 dog parks, 1 public golf course, and 1 skate park. In addition, the Department has a 1,100-acre riparian marsh and 1,312 acres of public land across the bluffs on the City's east side. **Map 13** shows the location of all City parks and recreation lands and facilities.

Ensuring that the City's parks and public lands are maintained, improved, and managed in the best interests of the community, the Department is guided by a comprehensive strategic plan, most recently updated on June 12, 2025. A copy of this plan is attached as **Odegaard Exhibit 7**.

The City's parks support numerous regional events, including the 4<sup>th</sup> of July celebration Riverfest, holiday Rotary Lights, Oktoberfest, and concerts, parades, 5K run/walks, and more.

**Map 13**



Many of the City's parks offer paved off-street parking, indoor restrooms, indoor shelter houses, and other amenities. See **Odegaard Exhibit 2**.

The City is also committed to inclusivity in its park system. In 2021, the City opened its All Abilities Trane Park specifically designed for children of all abilities and including equipment designed for those with cognitive, sensory, and physical challenges.

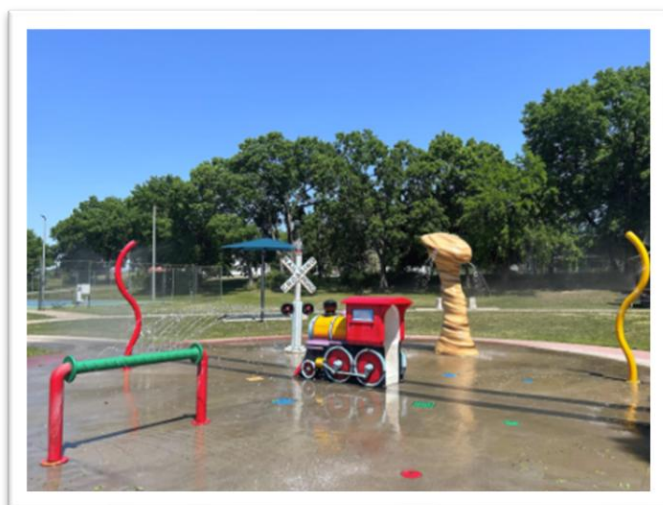


*Figure 7 - Trane All Abilities Park*

The City's commitment to its recreational lands has earned national recognition, with the City's Grandad Bluff Park's improvements in 2012 (including accessibility improvements), being named the American Public Works Association's Project of the Year in 2013.

The City's parks and recreational lands are not just City assets, but are resources utilized by the greater region, including Town residents living on French and Hiawatha Islands. Indeed, the City has numerous unique park facilities located in the City just outside of the Town limits. These include Copeland Park, Veteran Freedom Park, Black River Beach, and the Northside Swimming Pool.

The City's Copeland Park, located just across the Black River from French and Hiawatha Islands and adjacent to the Clinton Street bridge, also hosts the regional baseball and softball teams, the La Crosse Loggers and La Crosse Steam. In addition, it has other baseball and softball fields, tennis courts, enclosed shelter, playground, splash pad, indoor bathrooms, fishing access, and a winter ice rink. The City's 2026 capital budget included over \$3 million to renovate the Copeland Park shelter.



*Figure 8 - Copeland Park Splash Pad*



Just north of Clinton Street is one of the City's two public beaches, Black River Beach. It features a beach area with outdoor showers, two reservable shelters, a large neighborhood center with reservable rooms for meetings and events, and indoor bathrooms. Except for facility rentals, the City does not charge for use of its beaches.



*Figure 9 - Black River Beach*

Four blocks west of Black River Beach is one of the City's swimming pools, Northside Swimming Pool, located adjacent to the Logan Middle School. The Northside Pool has provided recreational opportunities for the public, including those in the Town, for decades but is at the end of its useful life. The City is in discussions with the La Crosse School District to create and fund a new replacement indoor pool facility on the north side to be used year-round by the School District and the public.



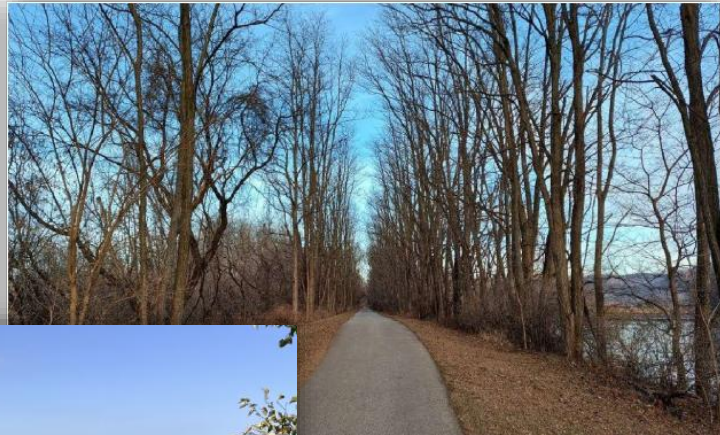
*Figure 10 - Northside Swimming Pool*

The City's West Copeland and Veterans Freedom Park takes up the southern end of Hiawatha Island south of Clinton Street, and includes a boat landing, marina, canoe/kayak access, fishing access, a gazebo, a memorial, reservable space, indoor bathroom, sports fields, and athletic fields. It is the host of major fishing tournaments, free to the public.

There is also a City beach located on French Island, lying east of the Airport, which is currently not maintained, but remains accessible to the public.

The City also maintains an extensive trail network of 40 different paved and natural surface trails, extending over 72 miles throughout the City.

**Odegaard Exhibit 3.**



*Figure 11 - Pictures from the City trail system*

In addition to its parklands and facilities, the City's Parks and Recreation Department offers a multitude of recreational programs for children, adults, and seniors throughout the year, including a special recreation program. An example of what programs and activities the City offers during the fall is **Odegaard Exhibit 4**. These activities include:

- Special events, including the Pettibone Haunted Mile, Bluff Bash, Holiday Fair, and Polar Plunge.
- Youth Recreation, including flag football, volleyball, figure skating, basketball, All Abilities Play Group, and Make & Play Mondays.
- Outdoor Recreation, including walking, hiking and cross-country ski trails.
- Supervised playgrounds and day camps for children in the summer.
- Boat launches and landings.
- Adult Recreation, including adult classes, sign language programs, card games, knitting, bingo, exercise, walking groups, support clubs, music lessons, enrichment classes, STAR



(Sports, Therapeutic & Adaptive Recreation), art and crafts, basketball, volleyball, pickleball, yoga, chair fitness, and Qigong.

- Senior Excursions for 50 plus.
- Special Recreation, including parties, bingo, movies, nature walks, game nights, crafts, tea parties, cooking classes, mini voyages including corn mazes, various sports, Rotary Lights visits, and trips.
- Responses to letters to Santa.
- Playground Passport that encourages children to visit all City parks



Figure 12 - La Crosse Playground Passport

In its commitment to provide services to people of all abilities, the City operates a special recreation program, which includes programs with Special Olympics. In support of these programs, the City has two staff positions, an Inclusive Recreation Coordinator and a Recreation and Community Enrichment Coordinator. The Program offers a variety of educational, recreational, and entertainment programs for individuals with special needs of all ages and abilities, including: cooking classes, arts and crafts, bingo, visits to Rotary Lights, Mall of America trips, and activity nights.

Senior specific programming includes educational classes, concerts, dances, movies, yoga and other fitness classes, enrichment classes, social clubs, and music lessons. In addition, the City offers senior excursions, which are day trips to various locations throughout Wisconsin and Minnesota. Local organizations utilize City facilities to provide the La Crosse County Senior Nutrition Program and the local Meals on Wheels, which are both available to residents of Campbell.

The Department also has two certified foresters on staff who administer the City's forestry program, which includes sustainability programs, tree planting and trimming, boulevard tree planting, community orchards program, and the memorial trees and benches program.

The Department works on beautifying the City through its Arts Coordinator position that works with the City's Arts Board and arts community to support and implement public art through the City and its parks, buildings, facilities, and parking structures.

The Department's operating budget is over \$5.2 million dollars for 2025, which includes parks, recreation, forestry, and certain City-owned facilities, other than the La Crosse Center. This equates to an expenditure of approximately \$101 per person.

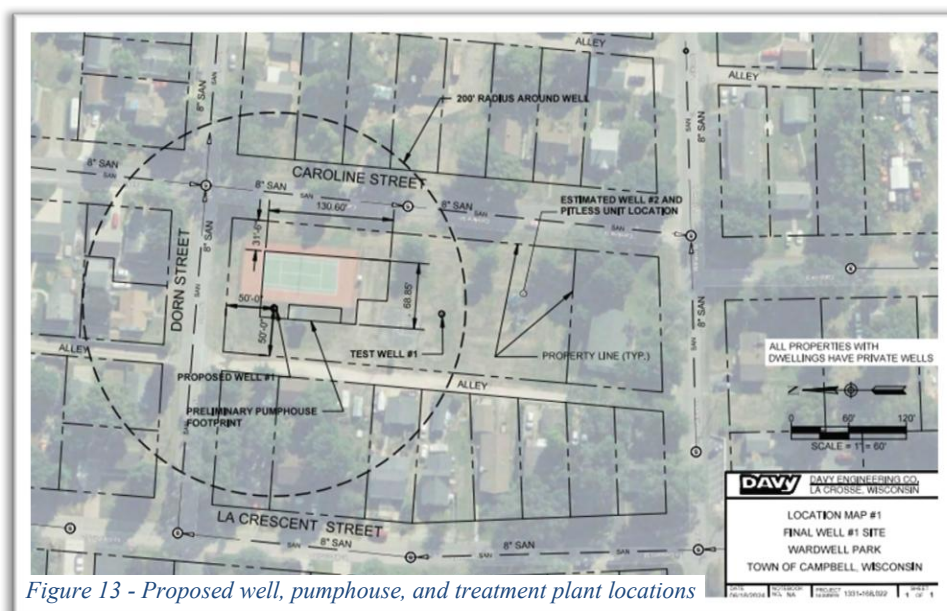
The information in this section is supplemented by the Testimony from Jason Odegaard, La Crosse Director of Parks and Recreation, attached as **Odegaard Testimony and Exhibits**.

## *Proposed Village*

The proposed village has a system of 13 small parks, open areas, and other recreational facilities, totaling 27.87 acres. In addition, the proposed village maintains three existing public boat launches, all located north of I-90. (The City of La Crosse maintains the only public boat launch on French or Hiawatha Islands south of I-90 at Veterans Freedom Park.)

The proposed village's limited parkland acreage will shrink further. One of the identified parks, Sky Harbour Park, is located on leased property at the west end of the Sky Harbour commercial development. The Town recognizes that the Town does not own this 9.5-acre property and admits the property's "future use may evolve with commercial development plans." Town Incorporation Report p. 10. A second park, Wardwell Park, is the site of the proposed village's proposed wells and water treatment plant, which will result in a loss of or reduction to that park.<sup>16</sup> A site plan for the proposed water treatment plant is **Figure 13**.<sup>17</sup> Considering that the proposed village is almost fully developed, there are likely few if any locations to provide replacement facilities.

(The treatment plant is not labeled on **Figure 13**, but its location is the outline overlapping the tennis court.)



*Figure 13 - Proposed well, pumphouse, and treatment plant locations*

The proposed village has no swimming pools,<sup>18</sup> no splash pads, no public beaches, no ice rinks, no golf course, no skate parks, and no biking trails. The only restroom facilities located in the proposed village's parks are portable. See La Crosse County Outdoor Recreation Plan, p. 15 (part of the Town Incorporation Report).

<sup>16</sup> "The existing tennis court and basketball court must be removed for construction of well #1, pumphouse and water treatment plant." Preliminary Engineering Report, Davy Engineering Co., available at <https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=562548> (PSC REF#: 562548).

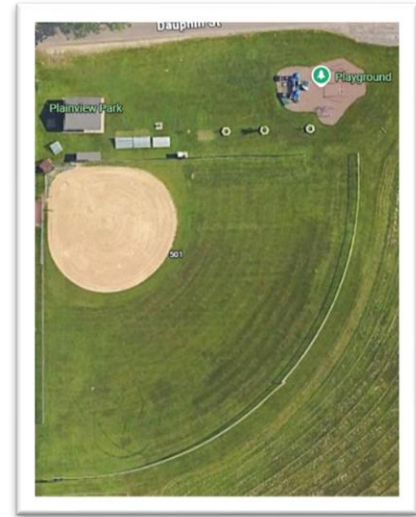
<sup>17</sup> From Attachment 1.8.2 of the Campbell Water Utility's PSC Construction Authorization Application, available at <https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=562550> (PSC REF#: 562550).

<sup>18</sup> While the Town Submission states that the La Crosse School District has a public pool at Logan Middle School, this is incorrect. There is a City-owned pool located near Logan Middle School that is operated by the City of La Crosse Parks and Recreation Department.

Outside of the boat ramps, the proposed village identifies only one park with off-street parking (Plainview Park), but aerials of the Park (right) show that the parking is a grassy area near or adjacent to a concession stand and the playground equipment.

While outside groups may use the Town's parks for games, the Town has not identified any programming or activities that the Town currently does or that the proposed village will provide to its residents at its parks.

The Town's parks are maintained by the Town's Maintenance Department, which is also responsible for operation and maintenance of the Town's sanitary sewer system, streets, and town facilities. The Town's Maintenance Department is staffed by 4 full-time employees and 1 part-time employee. The proposed village is not proposing to add any additional staff to assist with parkland.



The Town's 2025 budget for parks and recreation, including boat landings<sup>19</sup>, is \$54,500. This equates to an expenditure of under \$13 per person. Excluding the \$25,000 spent on boat landings, the 2025 budget is \$29,500, or under \$7 per person, and only includes funds for limited improvements to one Town park, Plainview Park, detailed as "the installation of a water bottle filling station, benches, and shaded seating areas" (Town Incorporation Report, p. 22). This is the case even though according to the Town Plan, almost 30% of the respondents to outreach surveys believe that the existing parks and recreation facilities need improvement and over 45% want more hiking trails. The Town Plan identifies hiking trails and biking routes as the most desired improvements in the Town, yet the Town has no capital plan or identified vision for providing these.

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<sup>19</sup> \$25,000 of revenues and expenses for the proposed village parks comes from boat landing fees which are strictly used for maintenance, upkeep of the landings, docks and areas surrounding the landings. Town Incorporation Report pp. 96-97.

### ***Comparison of Services – Parks and Recreation***

The City's parks and recreational facilities are vastly superior to the Town's. On its over 1,500 acres of parkland, the City offers facilities, programs, and activities that are used by people throughout the La Crosse metropolitan region.

**Table 12**

	<b>Parks, Recreation and Forestry Comparison</b>	
	<b>Proposed Village</b>	<b>City of La Crosse</b>
Parks, Recreation and Facilities 2025 Budget*	\$101,600	\$5,232,062
Parks and Recreation – General Operations	\$16,000	
Staff	4 full-time, 1 part-time**	23 full-time, >200 part-time
Offers Extensive Programming through Parks & Rec for Children, Adults, and Seniors	No	Yes
Acres of Parkland	27.87	1,560
Acres of Additional Public Land Owned by Municipality (including marshes)	-	2,412
Public Parks	13	47
Dedicated all abilities parks	0	1
Park Amenities		
Playgrounds	9****	36
Shelters	3	18
Athletic Fields	-	12
Baseball Diamonds	3	10
Lighted Fields	-	7
Non-lighted Fields	-	3
Basketball Courts****	2	8
Tennis Courts****	3	29
Lighted Courts	-	15
Non-lighted Courts	-	14
Dedicated Pickleball Courts	0	8
Volleyball Courts	0	3
Sand Volleyball Courts	0	1
Batting Cages	0	2
Boat Landings	3	5
Parks available with indoor restrooms	No	Yes
Harbors/Marinas	0	3
Dog Parks	1	3
Public Beaches	0	2
Public Pools	0	3
Splash Pads	0	4
Ice Skating Rinks	0	3



Skate Parks	0	1
Public Golf Courses	0	1
Disc Golf Courses	0	1
Miles of paved trails	None stated	27
Miles of natural trails	None stated	45

\*This number for the Town includes identified operation expenses for the Town Hall, Community Center, and Parks & Recreation. This number for the City includes the budget for parks, recreation, forestry, and certain City-owned facilities, other than the La Crosse Center.

\*\*In addition to parks, recreation, and facilities, Town staff also maintain streets, equipment, and the wastewater system.

\*\*\*This count of Town playgrounds includes two without play structures (Nelson Park, which only has a swing set, and one of the Second Ave East Parks, which has one swing set and an older merry-go-round) and Wardwell Park, which is the location of the proposed water wells and treatment facility.

\*\*\*\*One tennis court, one basketball court, and one playground are located at Wardwell Park, the location of the proposed water wells and treatment facility.

The proposed village will not and cannot provide the same level of service on its 27 acres.

As discussed above, a number of unique City parks and facilities providing public services and facilities that are not otherwise available to the proposed village are located on the doorstep of French Island. See **Figure 13**, to the right. These include Copeland Park, Veteran Freedom Park, Black River Beach, and the Northside Swimming Pool.

Residents in the proposed village will continue to need and use the City's park system to have access to public pools, public beaches, splash pads, hiking trails, biking trails, skating rinks, a skate park, a public golf course, a disc golf course, a campground, and amphitheaters. Similarly, residents in the proposed village will continue to rely upon the City to provide programming and activities for children, adults, and seniors.



Figure 13 - City Parks near French and Hiawatha Islands

Town residents should contribute to the costs of the recreational facilities and programs they already enjoy. If the Town were to annex into the City, Town residents would contribute to the

cost of these facilities and programs. In addition, parks on French Island would be incorporated into the City's park system and upgraded to City standards and recreational programming could be extended to Summit Elementary School.



## **Library Services**

### ***City of La Crosse***

The La Crosse Public Library is a City owned and funded public library located within the City of La Crosse, with its main library located at 8<sup>th</sup> and Main Streets. The main library is open approximately 56 hours per week.



*Figure 14 - La Crosse Public Library Main Branch*

The City's Library budget in 2025 is \$5,201,095 dollars. Approximately 94% of the Library's budget comes from City funding.

The La Crosse Public Library has 59 employees, including 50 full-time positions. The Library's staff includes librarians with master's degrees in library science and two "community connectors" who help individuals by providing connections to community resources. As part of their jobs, the staff regularly attends many community events. There is also an active Friends of the Library nonprofit that supports library services and programming, including the development of collections, materials, and research tools.

The La Crosse Public Library is the largest member of the Winding Rivers Library System (WRLS), a consortium of member libraries, and is also the resource library for WRLS. As the resource library, the La Crosse Public Library provides support to smaller libraries, including helping those libraries understand the policies within the system, providing some training, referring individuals to the La Crosse Public Library's archives department, and more. The La Crosse County Libraries, including the FJ Robers Library, are also members of WRLS.

While the La Crosse Public Library is almost entirely supported by City tax dollars, anyone can access and use the Library's resources, not just City residents. Of the 32,810 active card holders in 2024, almost 8,000 of them were non-residents.

Also in 2024:

- The La Crosse Public Library possessed 122,929 physical materials, with almost 12,000 new materials added to its collection.
- Users checked out 582,084 items, borrowed 457,450 physical materials, and checked out 124,634 electronic items.
- The Library hosted over 1,000 free library programs and events, which were attended by 38,007 people.

See the La Crosse Public Library's 2024 Annual Report, attached as **Wacek Exhibit 3**.

In addition to its physical collection, the Library provides online resources, including ebooks, audiobooks, movies, music, and other materials. It offers additional online language programs, ancestry and genealogy information, archives, reference materials, consumer information, health resources, and more. Some of these require a library card, while others are specific to City residents depending on the funding.



Figure 15 - La Crosse Public Library in 2024

The La Crosse Public Library's 2024 programming included:

- Storytime programs (for families, adults, and children)
- Northside After School Club
- All Abilities Play Group
- Repair Café (where volunteers fix items in need of repair)
- Career Navigation Assistance
- Book clubs
- Crafting workshops
- Fitness classes
- Dungeons and Dragons and other game nights
- Book themed bingo
- Movie nights
- Various clubs
- Knitting lessons
- Programs for seniors
- Many other educational and learning courses

The La Crosse Public Library's Summer Reading Program provided daily activities and events throughout the summer, including a summer carnival, storybook walks through the marsh, a Bluey-themed celebration, park storytimes, and an interactive Where the Wild Things Are experience. A list of all of the La Crosse Public Library's programs and events offered in 2024 is attached as **Wacek Exhibit 6** and a list of 2025 events to date is attached as **Wacek Exhibit 7**. These events are all free and open to anyone, even if someone does not have a library card.

The La Crosse Public Library is unique in the region in having a dedicated children's room and teen space. The Children's and Family area is designed to spark curiosity, creativity, and a love

of reading in the area's youth. Providing interactive play space that combines fun with early literacy and Science, Technology, Engineering, the Arts, and Mathematics (STEAM) skill development. The Teen Space is designed for youth in grades 6-12 and is monitored by library staff to provide an inviting and safe space for teens to engage in individual and group activities.

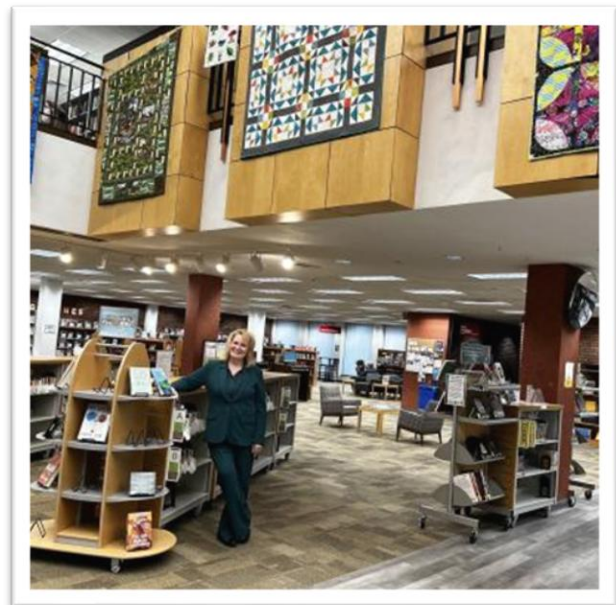
The La Crosse Public Library works with the La Crosse School District to provide library tours, special library tours to kindergarteners and second graders, librarian visits to 4K classes, "Books to Go" checkouts brought to classrooms, and other special events like Family Fun Nights, School Carnivals, and Literacy Nights. The Library works with other youth organizations, like the Boys and Girls Clubs of Greater La Crosse, to provide additional access and programming.

The Library is also focused on providing programs and services for adults and seniors. This programming includes a chair fitness class and the Library's signature lifelong learning program for ages 50 and above, Monday Mornings at Main, where attendees hear from a new speaker on a variety of topics. The Library also offers home delivery of materials and delivery to senior centers and one-on-one appointments that include technology assistance.

The Library has an Archive Department staffed by one full-time and two part-time dedicated staff members that research, document, and archive local history, genealogy, City records, media reports, and other items of local interest. The Archives Department assists the public in researching historical areas of interest and coordinate historical tours and programs.

The Library offers additional regional services, like daytime warming for weather emergencies and services for incarcerated persons.

The information in this section is supplemented by the Testimony from Dawn Wacek, Director of the La Crosse Public Library, attached as **Wacek Testimony and Exhibits**.



*Figure 16 - La Crosse Public Library*

### ***Proposed Village***

The Town owns a 1,700 square-foot facility, north of I-90, that it leases to the La Crosse County Library System. This “FJ Robers Library” is staffed, supplied, funded, and serviced by the County. If the proposed village incorporates, this relationship will continue. The Town’s budget for general operations of the Library in 2025 is only \$8,000.

The Town reports that the library hosts educational programs, youth activities, and community events, but does not provide examples of any specific programs. A seven-member Friends of the Campbell Library group helps support the library through volunteer efforts and fundraisers.

### ***Comparison of Services - Library***

The City provides a much higher level of library services than the proposed village. The La Crosse Public Library has a larger collection, better service, a larger variety of programs, more inclusive programs, numerous children’s programs, and more senior-oriented programs and services than the proposed village can offer. The Library offers the expanded services that the residents of the proposed village need.

The City already provides library resources to the Town of Campbell, with approximately 1,500 patrons from the Town checking out more than 3,700 items within the last year. While not specifically tracked, as the main source of programming, there are likely more residents from the proposed village who attend the La Crosse Public Library’s free events and programs.

While most resources and offerings are available to anyone with a library card, if the proposed village were instead to annex into the City, its residents would gain access to the La Crosse Public Library’s complete collection of electronic and online resources. The proposed village’s older residents would also gain access to the Library’s home delivery program.

## **Senior Services**

### ***City of La Crosse***

The City of La Crosse funds a number of opportunities for seniors through the City's Parks and Recreation Department and the City's Public Library. The City offers numerous activities, like educational classes, concerts, dances, movies, yoga and other fitness classes, enrichment classes, social clubs, and music lessons. The Parks and Recreation Department also offer senior excursions, which are day trips to various locations like Austin, MN, Madison, WI, Fort Atkinson, WI, Middleton, WI, for meals, concerts, shopping, and plays and other live performances.

In addition, the City's Southside Neighborhood Center hosts the La Crosse County Senior Nutrition Program, which offers meals for seniors 60 years and older and their spouses in a group setting. The nonprofit agency Mobile Meals of La Crosse, sometimes called Meals on Wheels, uses the Southside Neighborhood Center to prep meals for delivery to seniors, disabled, low-income or homebound individuals in La Crosse, the Town of Campbell, and Onalaska.

The information in this section is supplemented by the following testimony and exhibits:

- Testimony from Dawn Wacek, Director of the La Crosse Public Library, attached as **Wacek Testimony and Exhibits.**
- Testimony from Jason Odegaard, La Crosse Director of Parks and Recreation, attached as **Odegaard Testimony and Exhibits.**

### ***Proposed Village***

The Town Incorporation Report does not indicate that the proposed village will commit any funding or resources to serving its senior population. This is the case although the median age of Town residents is 10 years older than La Crosse County as a whole and the senior population is expected to only continue to grow (Town Plan p. 11).

### ***Comparison of Services – Senior Services***

The City provides a higher level of senior services than the proposed village can or will. Despite having an older population, the proposed village does not devote any specific funding or resources towards its senior population. As the average age of the residents of the proposed village stands only to increase, the proposed village will have an even greater need of the services that the City provides.

#### **IV. PUBLIC WORKS**

##### **Public Works Department**

###### ***City of La Crosse***

The City's Public Works Department includes the City departments of Engineering, Street (including Refuse and Recycling), and the Water, Sewer, and Stormwater Utilities. All together there are 121 full-time employees in the Public Works Department. The Public Works Director directly manages seven employees that supervise the other sub-departments, including:

- Deputy Director of Engineering and Public Works
- Deputy Director of Public Works and Utilities
- City Surveyor
- Superintendent of Streets
- Water Superintendent
- Superintendent of Sewers and Wastewater Treatment Plant
- Utilities Finance and Compliance Manager

Descriptions of the different sub-departments under the Public Works Department are provided in other sections.

The overall 2025 operating budget of the Public Works Department, including all sub-departments, is \$33,597,739. The individual department operating budgets in 2025 are:

Engineering Department	\$1,927,021
Street Department (w/ Refuse & Recycling)	\$8,377,481
Water Utility	\$6,828,464
Sanitary Sewer Utility	\$13,315,235
Stormwater Utility	\$3,149,538

The information in this section is supplemented by the Testimony from Matthew Gallagher, City of La Crosse Director of Engineering and Public Works, attached as **Gallagher Testimony and Exhibits**.

###### ***Proposed Village***

The Town's Maintenance Department is responsible for all public works services in the Town, including the operation, repairs, and maintenance of the Town facilities, sanitary sewer facilities, streets, parklands, boat launches, and equipment. To perform all of these functions, the Town's Maintenance Department is staffed by 4 full-time employees and 1 part-time employee.

The proposed village expects to add one additional position with lead responsibility for the proposed water system operations. However, the proposed village will not add any additional positions to related to the general public works functions.

The total public works budget for the Town in 2025 was \$790,614. See **Attachment 4**.



### ***Comparison of Services – Public Works Department***

The City's Public Works Department provides a higher level of service than the proposed village's Maintenance Department. The City's Public Works Department is larger, has broader capabilities, and has more specialization than the proposed village's 4 ½ member Maintenance Department. These capabilities and services will be addressed further in the rest of this Section IV.

**Table 13**

	<b>Public Works Comparison</b>	
	<b>Proposed Village</b>	<b>City of La Crosse</b>
Public Works 2025 Budget*	\$790,614	\$33,597,739
Staff	4 full-time, 1 part-time	121 full-time
Fleet size	15	Over 116

## **Engineering**

### ***City of La Crosse***

The City has a fully staffed Engineering Department with 18 full-time professional employees, overseen by the two Deputy Directors in Public Works and the City Surveyor. Specialized staff include:

- Citywide ADA Coordinator
- Public Works Locator/Code Enforcement Technician
- Professional Land Surveyor
- Multiple registered Professional Engineers
- Engineering technicians with construction inspection training and experience, including traffic engineers
- CAD/GIS Specialist
- Utility Locator

The Engineering Department staff performs a wide variety of services for the City:

- Conducts professional survey, design, public bidding, construction management, and as-built plan record keeping for street, utility, and facility projects for all Public Works departments.
- Creates and maintains Standard Specifications & Procedures and Standard Details for construction projects, including established standards for pavements, concrete curb and gutter, concrete alleys and driveways, sidewalks, streetlighting, and pavement marking.
- Studies, design, and ensures compliance for all traffic signals, Stop/Yield signs, and official traffic signage and markings for all permanent and temporary traffic control in the City, including approximately 56 traffic signals, thousands of streetlighting poles, over 10,000 signs, and over 100 lane miles of pavement markings.
- Coordinates, designs, and maintains emergency vehicle preemption (EVP) for the City's Fire and Police Departments.
- Permits and inspects public right-of-way permitting for private activities, such as excavations, oversize load moving, sidewalks and driveways, and temporary occupancy for construction and containers/dumpsters.
- Coordinates and permits private utility occupancy of public right-of-way space, including for gas, electric, and communications.
- Reviews extraterritorial subdivision plats, including in the Town of Campbell.
- Oversees the inspection and maintenance of the City's levee system.

The Engineering Department also has a dedicated fleet of 8 vehicles.

Having its own design staff allows the City to provide professional level engineering and surveying services for the City that are efficient and cost effective. If the City were to contract engineering to private firms, the City would pay between 200% and 300% the cost of having in-house staff. The 2025 budget for the Engineering Department is \$1,927,021.

The information in this section is supplemented by the Testimony from Matthew Gallagher, City of La Crosse Director of Engineering and Public Works, attached as **Gallagher Testimony and Exhibits**.

### ***Proposed Village***

The Town contracts with Davy Engineering for engineering services. The Town's 2025 budget included \$100,000 for services identified as "Town Hall-Prof. Fees/Engineer." It is not clear if this includes fees incurred related to the incorporation efforts or planning the proposed water system. As the proposed village has not budgeted for increased staff, it is expected that the proposed village will continue to utilize a third-party contractor to provide as requested engineering services.

### ***Comparison of Services – Engineering***

The City provides a higher level of in-house engineering services than the proposed village will. By having in-house engineers, the City maintains its own staff and records. City staff are intimately familiar with existing City infrastructure and plans. City staff already review any subdivision plats in the Town of Campbell and have a working knowledge of the Town.

If the entire Town of Campbell were to annex into the City, the existing Engineering Department could absorb the additional work and provide the higher level of in-house engineering services that the City provides, including design, survey, traffic engineering, ADA compliance, permitting, right-of-way management, and project management. Considering the infrastructure needs within the proposed village, as addressed below, the proposed village will need the level of engineering services that the City provides.

## Streets

### *City of La Crosse*

The City of La Crosse Street Department is responsible for maintaining all transportation facilities in the public rights-of-way, including streets, alleys, sidewalks, shared-use paths, traffic signals, streetlighting, official traffic signage, and painting and pavement markings. The City has over 250 miles of various roadways under its jurisdiction for which the Street Department provides various construction and maintenance activities, including:

- Street demolition and construction, including concrete work, curb and gutter work, milling, sealing, patching, and pothole filling.
- Milling, sealing, patching.
- Maintaining and constructing conduits and wiring for streetlighting, traffic signals, and optic fiber.
- Installing and maintaining traffic signs, lights, and traffic signals.
- Pavement management including biennial pavement rating and inventory.
- Street sweeping.
- Snow and ice management.
- Fabricating, installing, and maintaining temporary traffic control barricades and signs for construction projects and special events.

The City employs 44 full-time staff overseen by the Superintendent of Streets. Staff include:

- Assistant Superintendent of Streets.
- Streets Supervisor/Recycling Coordinator.
- Fleet and Maintenance Garage Manager.
- Five full-time mechanics that service and/or maintain hundreds of vehicles and equipment for all City departments.
- Two inventory/parts technicians.
- Two electricians to maintain lights and signals citywide.

Street staff is on-call 24 hours a day for emergency response.

The Street Department is also responsible for the Municipal Services Center (MSC) Facility, which includes:

- Shared office space.
- Fleet vehicle garage and maintenance mechanic shop.
- Central supply and receiving.
- Various storage buildings.
- Salt barn.
- Brush site.
- Fire Testing Facility.
- Raw materials supplies including sand, crushed rock, and recycled asphalt and concrete pavement.
- Sign shop.
- Carpentry shop.
- Electrical shop.
- City gasoline pumps.
- Police bicycle barn.
- MTU bus barn.

The City's Street Department has a fleet of 108 vehicles, including single-axle and tandem dump trucks and plows, light trucks and trailers, a street paver and rollers, a wheeled excavator and 6 graders, and various pieces of equipment for salting, brining, leaf vacuuming, and erecting, maintaining, and removing poles and posts for streetlighting, traffic signals, and signing. A list of the Department's equipment is attached as **Gallager Exhibit 1**.

The 2025 operating budget for the Street Department (including Refuse & Recycling) is \$8,377,481. In addition to this, the City's Capital Budget includes additional funds for road construction.

The information in this section is supplemented by the Testimony from Matthew Gallager, City of La Crosse Director of Engineering and Public Works, attached as **Gallager Testimony and Exhibits**.

### ***Proposed Village***

The Town contains only 19.63 miles of locally-owned streets<sup>20</sup>, with an additional 5.58 miles of County trunk highways which serve as the main connectors within the Town. In addition to its other responsibilities, the Town's Maintenance Department of 4 ½ employees is responsible for performing all street maintenance.

### ***Comparison of Services - Streets***

The City's Street Department has more facilities, equipment, and manpower than the proposed village. The City has 43 dedicated full-time staff who are focused on the City's streets and fleet, whereas the proposed village has 4 full-time and 1 part-time employees who are also responsible for all other public works responsibilities.

**Table 14**

	<b>Streets Comparison</b>	
	<b>Proposed Village</b>	<b>City of La Crosse</b>
Streets Operations Budget 2025*	\$790,614	\$8,377,481
Staff	4 full-time, 1 part-time*	44 full-time
In-house full-service Engineering Department	No	Yes
Fleet size	15	Over 108

\*Also responsible for all other public works responsibilities.

The City's Street Department already manages the City's 4.2 miles of roadway on French and Hiawatha Islands. The City does have an informal agreement with the Town to share maintenance of Nakomis Avenue on Hiawatha Island. However, this has led to confusion by Nakomis Avenue residents on who is responsible for issues that arise. It has also prevented the City from improving Nakomis Avenue to City standards, including curb and gutter.

<sup>20</sup> It is not clear if this number includes the alleys in the Town that are in the public rights-of-way.

If instead of seeking incorporation the Town were to annex into the City, its residents would see an increase in the quality of services. With the improvements to Town infrastructure that are needed in the proposed village, including aging streets, alleys, and sewer, and the lack of sidewalks, bicycle lanes, and street lights, the City's Street Department is in a better position to provide these services than the proposed village. While the City's Street Department may need to add a few employees, the City would not need any new equipment, management or administrative staff to take over street duties on the entirety of French and Hiawatha Islands.



## **Solid Waste Collection and Recycling**

### ***City of La Crosse***

The City's Refuse and Recycling Department operates under the Street Department. It is overseen by the Street Supervisor/Recycling Coordinator and includes a Street Sweeper Crew Leader and three Equipment Operators, one Maintenance Worker staffing the City's Brush Site, and two full-time Accounting Assistants in the office.

The City contracts with Harter's Quick Clean Up for refuse and recycling pickup for residents. See **Gallager Exhibits 3-4**. Each residence has a once-a-week refuse and every other week recycling pick-up. The day of the week that pickup occurs varies depending on the property address. See **Gallager Exhibit 2** for the City's 2025 Recycler.

Department staff administers refuse and recycling collection from larger City facilities and conducts enforcement of refuse, recycling, and illegal dumping citywide. The Department also operates the City's Brush Site, administers seasonal leaf pickup operations citywide, operates the composting, mulching, and yard waste operations, and administers the citywide DNR grant helping to fund these services.

The City collects and chips brush curbside from April 21 through May 2 each year. The City of La Crosse provides free leaf collection curbside for all City residents for 4 weeks in late fall. The City also provides free curbside Christmas tree collection for two weeks in early January. The City also has a yard waste collection site located at Isle La Plume for City residents who purchase an annual \$25 permit. This site is open seven days a week from March 24 through November 25. Free residential hazardous materials drop off is available at the County's landfill located in the northeastern part of the City of La Crosse.

The information in this section is supplemented by the Testimony from Matthew Gallager, City of La Crosse Director of Engineering and Public Works, attached as **Gallager Testimony and Exhibits**.

### ***Proposed Village***

In the Town, refuse and recycling is also handled through a contract with Harter's Quick Clean Up. Each residence has once-a-week refuse and every other week recycling pick-up. Pickup from Town properties occurs on Tuesdays. Large item and white goods pick-up is also available to Town residents four times a year with the total cost charged to the Town by weight of items picked up.

The Town conducts brush chipping for residents once a month from May through October. Christmas trees are picked up for approximately two weeks following Christmas. The Town does not provide any leaf pickup. The Town also operates a free yard waste drop-off site for Town residents, which is open seven days a week from April 1 to November 30. Free residential hazardous materials drop off is available at the County's landfill located in the northeastern part of the City of La Crosse.

### ***Comparison of Services – Solid Waste Collection and Recycling***

Solid waste and recycling service is similar in the City and proposed village with service being provided by the same contracted company. However, this also creates inefficiency and waste, particularly on Hiawatha Island where City residents place bins out on Mondays and proposed village residents place bins out on Tuesdays. This doubles the number of days that trash is at the roadside and requires the contractor to run trucks down the road twice weekly. Separate pickup days are required in order to measure the volume of waste collected for and billed to each community.

## **Flood Prevention and Response**

### ***City of La Crosse***

The City's has infrastructure, programs and plans in place to prevent and mitigate flooding from the Black River, the Mississippi River and the La Crosse River.

The City maintains a system of levees, which are the main infrastructure that prevent high river stage flooding. A map of the City's levees is attached as **Gallager Exhibit 5**. The City's Engineering Department oversees the inspection and maintenance of the City's levees. The Engineering Department maintains a list of known low points to assist with correcting them.

In a flood event, the Engineering Department:

- Inspects levees.
- Monitors river stages.
- Provides sandbags to residents and businesses.
- Makes flood preparations.
- Provides public information.
- Coordinates with the Fire Department on evacuation areas and closing streets.
- Coordinates with the Sewer Utility to prepare for infiltration in City sewers.
- Coordinates with the Street Department to install any temporary levees.

The City's flood management planning and response involves a number of City departments working in concert:

- The City's Floodplain Advisory Committee, supported by the Chief Building Inspector, manages and guides development and policy decisions related to floodplain areas.
- Engineering monitors potential flooding and the condition of levees, and coordinates with other departments.
- The Fire Chief serves as Emergency Management Director.
- The Fire Department and Police Department coordinate emergency response plans and operations.
- The Fire Department has the specialized teams and equipment to conduct rescue operations during active flooding events.
- The Stormwater Utility has a series of lift stations and portable pumps that can handle pumping flash-flood waters in streets during high river stages.
- The Sanitary Sewer Utility secures and seals manholes to prevent inflow into the system during flooding of high river stages.
- The Street Department maintains materials, including tarps, sand for fill and temporary levee construction, and has the large equipment to do so.
- The Street Department sweeps streets to minimize the amount of fine particulates that would otherwise enter the City's stormwater system and out into the rivers and marshes.

### ***Proposed Village***

The proposed village lacks the City's level of flood protection and preparation in spite of the fact that the developed area of the proposed village is on an island with a significant portion of that lying within a floodplain. Because of the Town's location, the Town has experienced significant flooding, including in 2025, 2023, 2001, and 1965.<sup>21</sup> During recent flood events, the Town has had to rely on assistance from the U.S. Army Corps of Engineers to supply necessary pumps.

It does not appear that the Town has taken any steps to be better prepared for future flooding events. The limited references to past activities that address ongoing or future flooding are to Boy Scouts helping to fill and deliver sandbags to affected residents. (Town Incorporation Report pp. 11 & 22.) The Town has no known levees which it monitors or maintains.

The Town currently works with La Crosse County and the Wisconsin Department of Natural Resources to administer and enforce floodplain and shoreland zoning regulations. However, if the Town incorporates, the proposed village will need to adopt, administer, and enforce its own floodplain and shoreland zoning regulations. The proposed village is not adding any additional staff to handle this added responsibility.

While the Town Incorporation Report recognizes the flood risk faced by the proposed village and the importance of flood protection measures (see Town Incorporation Report, pp. 10-11) it is largely silent on how the proposed village will manage this ongoing issue.

### ***Comparison of Services – Flood Prevention and Response***

The City provides a higher level of service related to preventing, mitigating, and addressing flooding than the proposed village. As flooding is only going to keep occurring in the proposed village, this remains an area where the proposed village is lacking in expertise, resources, and proactive action. The proposed village will need to take on additional responsibilities related to floodplain and shoreland zoning but has not proposed adding any additional staff or resources to do so. The proposed village's prior measures to address significant flooding have relied upon resources providing by the U.S. Army Corps of Engineers.

If the proposed village were to instead annex to the City, the City has staff with the knowledge and expertise to plan for and address flooding events in the territory proposed for incorporation.

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<sup>21</sup> See [https://www.news8000.com/news/local-news/town-of-campbell-using-pumps-to-help-with-flooding-overflow/article\\_be4de706-e24d-11ed-ba83-ffb9c9826c5a.html](https://www.news8000.com/news/local-news/town-of-campbell-using-pumps-to-help-with-flooding-overflow/article_be4de706-e24d-11ed-ba83-ffb9c9826c5a.html) (news article on 2025 flooding); see also <https://www.jsonline.com/story/news/2023/05/12/wisconsin-towns-along-mississippi-river-begin-flood-recovery-process/70205296007/> and [https://www.army.mil/article/266200/corps\\_of\\_engineers\\_supports\\_town\\_of\\_campbell\\_wi\\_flood\\_response](https://www.army.mil/article/266200/corps_of_engineers_supports_town_of_campbell_wi_flood_response) (news articles on 2023 flooding).

## **Stormwater and Stormwater Utility**

### ***City of La Crosse***

The City handles stormwater management from precipitation events (as opposed to flooding from the Black River, the Mississippi River and the La Crosse River) through its stormwater utility. The City of La Crosse Stormwater Utility is responsible for the collection, conveyance, and discharge of stormwater from all public rights-of-way throughout the City of La Crosse. This includes the ongoing inspection, flushing, and cleaning of approximately 150 miles of pipes and manholes, 6,100 catch basins, 6 ponds, and more than 360 individual stormwater outfalls to area rivers, creeks, and marshes. The Utility owns and operates 6 lift stations, with secure and enclosed operations meeting risk and resiliency goals. In operation of these systems, the Utility is responsible for ongoing compliance of the City of La Crosse's Stormwater Discharge Permit ("MS4 permit"), as regulated by the Wisconsin Department of Natural Resources.

The Stormwater Utility is overseen by the Sewer management team, with the Assistant Superintendents supervising the collection/conveyance and facilities (lift stations) operations. One full-time Stormwater Utility employee is responsible for compliance and enforcement of private stormwater treatment measures and the City's MS4 permit. The Stormwater Utility otherwise utilizes mostly Sewer Utility employees.

The Stormwater Utility is an enterprise fund that does not rely on the City tax levy. The 2025 operations budget for the Utility was \$3,149,538.

The information in this section is supplemented by the Testimony from Matthew Gallagher, City of La Crosse Director of Engineering and Public Works, attached as **Gallagher Testimony and Exhibits**.

### ***Proposed Village***

The Town does not have a stormwater utility and appears to have undertaken little, if any, stormwater planning. The proposed village largely lacks underground storm drainage structures and relies on positive drainage to area receiving bodies such as the Black River and Richmond Bay, as well as the percolate provided by the sandy soils.

### ***Comparison of Services***

The City's stormwater planning and management is proactive and protective. The City has taken the necessary steps to not only have stormwater management systems throughout the City, but to create a Stormwater Utility that ensures these systems are maintained and functional. The City has the existing expertise and capacity to start addressing stormwater management within the territory of the proposed village were it to annex to the City.

Stormwater planning should be incorporated with the reconstruction of Town streets if a water distribution system is installed. Failure to coordinate stormwater planning with this work would be a significant lost opportunity. The City is in a position to do this planning.

## **Sanitary Sewer Service**

### ***City of La Crosse***

The City's Sanitary Sewer Utility as an enterprise fund that is responsible for the collection and treatment of wastewater from three incorporated cities and two unincorporated townships, including the City of La Crosse, Cities of Onalaska and La Crescent (MN), and the Townships of Shelby and Campbell.

The Sanitary Sewer Utility has 28 full-time employees and is overseen by the Superintendent of Sewers and two Assistant Superintendents. The Superintendent of Sewers oversees the City's Sanitary Sewer Utility and Stormwater Utility. One Assistant Superintendent handles collection operations and the other handles treatment operations. Staff is on-call 24 hours a day for emergency response. Utilizing SCADA, the Sanitary Sewer Utility monitors the system continuously for volume of flow, strength of loading, and continuity of operations.

The Sanitary Sewer Utility owns and operates the City's Wastewater Treatment Plant (WWTP), and has recently completed a \$68 Million upgrade, making the WWTP the largest single project and public works facility in the City of La Crosse. Flows into the treatment plant from the region average more than 10 million gallons per day. In-house mechanics and electricians maintain specialized and finely tuned equipment to meet effluent requirements and regulations of the DNR. The Utility also maintains equipment to produce electricity in-house to power the treatment plant campus and dries bio-solids to produce commercial-grade fertilizer.

The Sanitary Sewer Utility also owns over 200 miles of pipes and manholes for collection and conveyance. It flushes and cleans approximately one-third of its system annually. It owns and operates 26 lift stations, with secure and enclosed operations meeting risk and resiliency goals.

To ensure that the Sanitary Sewer Utility complies with its Wisconsin Pollutant Discharge Elimination System (WPDES) permit, the Utility:

- Operates an Industrial Pretreatment Program regulating large industries and significant discharges.
- Ensures that there are proper municipal codes in place in communities served and utilizes municipal codes as enforcement of noncompliance issues.
- Manages trucked waste into the WWTP.
- Has a capacity, management, operations, and maintenance (CMOM) program for its collection system.
- Ensures that there is property operation and maintenance at Sanitary Lift Stations and the WWTP.
- Works with consultants and planning staff to address system needs.
- Budgets for future known treatment needs.
- Updates current Preventative Maintenance Schedules.
- Utilizes numerous established Standard Operating Procedures (SOPS) to operate the complex WWTP processes.



The information in this section is supplemented by the Testimony from Matthew Gallagher, City of La Crosse Director of Engineering and Public Works, attached as **Gallagher Testimony and Exhibits**.

### ***Proposed Village***

The Town currently provides sanitary sewer service by a town sanitary district. This sanitary district is administered and maintained by the Town of Campbell's administrative office and maintenance department.

The sanitary district has its own collection system which connects to the City's collection system at Clinton Street. From that point forward, the City conveys the Town's wastewater to the City's WWTP for treatment. Much of the Town's collection system dates back to the 1950s and is beyond its useful life.

Due to its age, the Town's collection system has significant infiltration and inflow (I & I) problems. I & I is unwanted introduction of external waters into a system. Infiltration is the penetration of groundwater into mains and manhole structures, typically through failed, broken, or improperly built infrastructure. Inflow is when surface water enters through illegal or incorrect connections. As one example, during one high river event in May 2023, sanitary sewer flows spiked up from 11 million gallons/month to 22 million gallons/month because of I & I.

Outside of age, the Town's system has other issues, including:

- Outdated manholes with pick holes, allowing inflow into its system.
- Historic issues with being part of Digger's Hotline, as required by the State, to locate its utilities and manage records. The failure to properly mark buried infrastructure can result in damaged infrastructure and unsafe conditions.
- No cross-connection inspection program to minimize clear water entering the sewer system.

Town residents pay user fees to the Town sanitary district. These fees are used in part to pay for treatment service provided by the City of La Crosse, and in part to pay for the sanitary sewer collection system. As a prior agreement governing wastewater conveyance and treatment service expired without a new agreement, the levels of service provided by the City are restricted by ordinance to those services in place at the time of the expired agreement. With no new agreement, there can be no expansion of the Town system. The City is providing wastewater treatment service in accordance with the City's ordinance regarding sewer conveyance and treatment.<sup>22</sup>

If incorporated, the sanitary district will dissolve by operation of Wis. Stat. § 60.79. The sanitary district's property will pass to the proposed village and the proposed village will assume all assets and liabilities of the district. Currently the Town and the sanitary district are each distinct

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<sup>22</sup> The City's ordinances are available at [https://library.municode.com/wi/la\\_crosse/codes/code\\_of\\_ordinances?nodeId=PTIGEOR\\_CH46UT\\_ARTIIISASTS](https://library.municode.com/wi/la_crosse/codes/code_of_ordinances?nodeId=PTIGEOR_CH46UT_ARTIIISASTS). City of La Crosse Code sec. 46-80(c) governs the provision of wastewater conveyance and treatment service to adjoining municipalities with expired contracts.

taxing jurisdictions with their own debt capacity. If incorporated, the number of taxing jurisdictions within the former town territory would be reduced, which would reduce the amount of general obligation debt capacity within the territory as well. Debt that could formerly be carried by the sanitary district must be carried by the proposed village.

### ***Comparison of Services – Sanitary Sewer Service***

The City Sanitary Sewer Utility has the staffing levels and experience to effectively operate and maintain both a complex collection and transmission system and the wastewater treatment plant that must treat all wastewater collected from five communities in Wisconsin and Minnesota.

Conversely, the Town already struggles to maintain, operate, and improve its aging collection system. The Town has limited staff in its Maintenance Department who must split their time among numerous public works projects.

As an example of the issues this can cause, the Town recently conducted sanitary sewer wet-well cleaning of its conveyance system. The Town or its contractor illegally dumped the resulting waste generated by the cleaning at the City's WWTP without Utility approval or permitting.

The Town also may be engaging in questionable planning decisions regarding the replacement of its collection system infrastructure. The Town is proposing to tear up many of its roadways to install a new water system, but it does not appear the Town is proposing significant replacements of the aging sanitary sewer pipe in the same right-of-way. While the roadbed is already opened, it is arguably negligent to not replace sanitary sewers at the same time. Coordinating replacement is more efficient and cost-effective.

The City has the existing expertise and capacity to operate and maintain the existing sanitary collection system within the territory of the proposed village were it to annex to the City.

## Water Utility Service

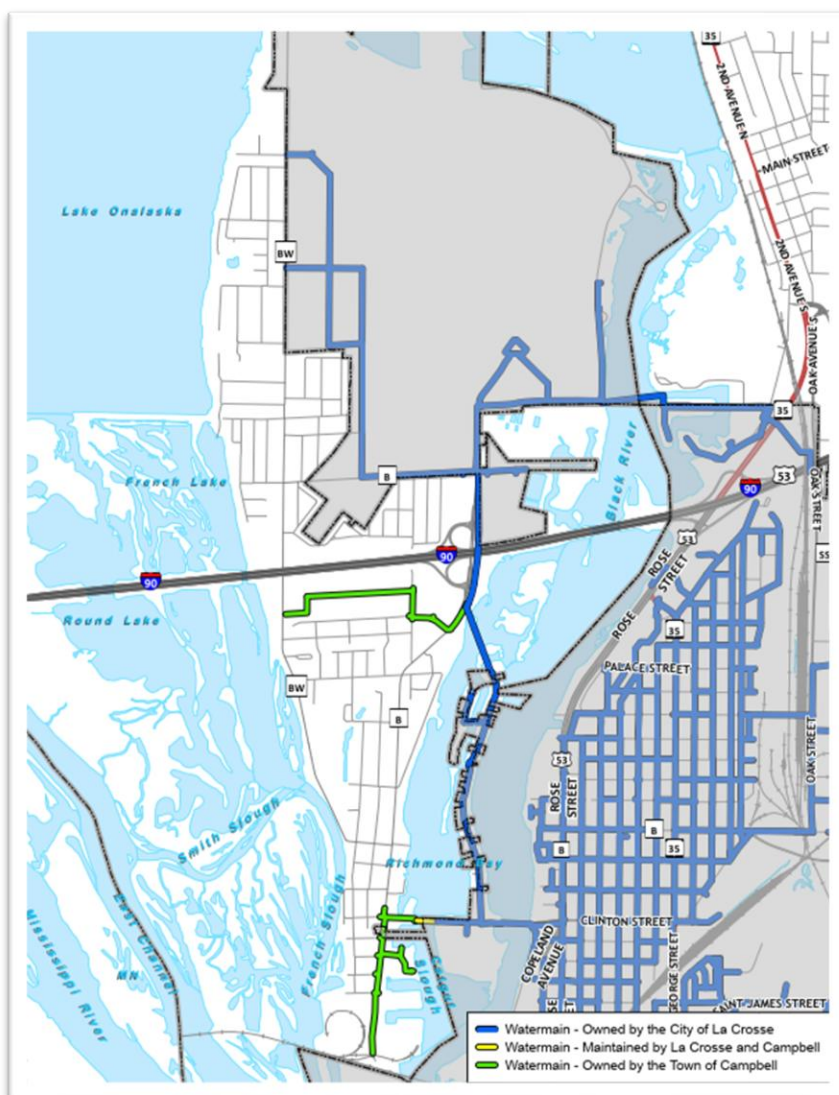
### *City of La Crosse*

The City's Water Utility provides safe drinking water to customers in the City of La Crosse and a few extraterritorial customers. On French Island, the City provides water service to the Airport and City properties located in the Airport Industrial Park and the Interstate Exchange Industrial Park. On Hiawatha Island, the City provides water to Veterans Memorial Park and over half the homes located on the Island. A map showing the location of the City's water mains on French Island and Hiawatha Island is **Map 14**, a smaller version of which is below.

The Water Utility owns and maintains 10 active wells, 2 reservoirs, a booster station, over 220 miles of water mains, and a campus with a historic office building, garages, maintenance, fabrication, and storage.

The City has abandoned three other water supply wells located on French Island due to elevated PFAS levels. In their stead, the City is placing greater reliance on its water supply wells located on the south side of La Crosse. The City is constructing a Highway 16 water main to convey water to the north side of La Crosse, including on French and Hiawatha Islands. This new water main serves a dual purpose – it improves redundancy and capacity for the area north of La Crosse Street and it also permits the abandonment of the wells on French Island with elevated PFAS levels. The City has been awarded Safe Drinking Water Loan funds (including \$5.1 million in principal forgiveness) for this project.

**Map 14**



The Water Utility extensively samples and tests its water for known, emerging, and unregulated contaminants on an ongoing basis. In 2024, the Water Utility reported 887 water samples to the DNR. The Water Utility meets all safe drinking water quality requirements. A copy of the Water Utility's 2024 Report is **Gallager Exhibit 6**. It has twice won statewide contests for best-tasting drinking water.

The Water Utility has 32 full-time employees and is overseen by the Water Superintendent and two Assistant Superintendents. One Assistant Superintendent oversees Supply Operations and the other oversees Distribution Operations. Staff is on-call 24 hours a day for emergency response. Utilizing SCADA, the system is continuously monitored for leaks, breaks, and other emergency conditions.

The Utilities Business Services Office has 8 full-time employees and is overseen by the Utilities Finance and Compliance Manager. The Business Services Office is jointly funded by the Water Utility, Sewer Utility and Stormwater Utility. This office handles billing, customer service, accounting, and education and outreach for approximately 19,425 accounts across the three utilities.

The Water Utility/Business Services Office is operated to comply with federal and state requirements. This includes:

- Cross connection inspections of approximately 5% of residential facilities each year.
- Cross connection inspections of non-residential connections on a 2 or 6 year cycle depending on hazard level.
- Enforcing cross connection corrective measures.
- Enforcing private well requirements which require abandonment or permitting.
- Compliance with the utility's risk and resiliency plan.
- Triennial operation of water valves.
- Annual operation of fire hydrants.
- Maintenance, testing and replacement of water meters.
- Biannual full system flushing of the mains.
- Location of buried facilities as required by Digger's Hotline.
- Monthly reporting to DNR on pumpage, chemical addition, and treatment.
- Annual reporting to DNR on water use withdrawals.
- Preparation and distribution of annual Consumer Confidence Report (CCR).
- Preparation of PSC Annual Report which includes detailed financial and operational information.
- Compliance with PSC customer services rules, including billing, deferred payment and disconnection rules.

The Water Utility is operated as an enterprise fund which means the Water Utility does not rely on the City's tax levy. The Utility covers all of its operating and capital expenses through its customer revenues and issues bonds or notes that are backed by utility revenues, if borrowing new debt. Customer rates are set by the PSC. A residential customer that uses 54,720 gallons per year pays \$229.12 per year under City rates.

The information in this section is supplemented by the Testimony of Matthew Gallagher, City of La Crosse Director of Engineering and Public Works, attached as **Gallagher Testimony and Exhibits**.

### ***Town***

The Town does not have a municipal water supply but has been exploring the creation of a Town-wide municipal water system. Most properties in the Town are served by private water wells and since 2020, many private wells in the Town have tested positive for a detection of PFAS. PFAS, which stands for per- and polyfluoroalkyl substances, are a group of man-made chemicals used to make products resistant to water, grease, heat, and stains. They are found in many common products, including firefighting foam, nonstick cookware, stain-resistant carpets, food packaging, and cosmetics. PFAS is considered an emerging contaminant about which there is increasing awareness and focus. Due to the detection of PFAS in private wells on French Island, the City has been providing bottled water to 60 homes adjacent to the La Crosse Regional Airport and the DNR has been providing bottled water to the rest of the Town.

The Town's engineer, Davy Engineering, prepared a preliminary engineering report for a water system in July 2024. Davy Engineering subsequently prepared an amended June 2025 report. The reports describe that the Town has already installed one water supply well located in Wardwell Park and that seeks to build (i) a second and possibly third well; (ii) a pumphouse and treatment facility on the Wardell Park site; (iii) an elevated storage tank; and (iv) a water distribution system.

The Town needs approval from the PSC and DNR to construct a water system. The City has not been able to confirm whether the Town applied for or received DNR approval of its proposed water system. The City submitted an open records request to the DNR for this information but the DNR has not responded. The Town did submit a request to the PSC for approval to construct a water system on September 23, 2025. On October 29, 2025, the PSC informed the Town that its application was incomplete and it provided six pages of reasons detailing the application's deficiencies. A copy of the PSC's incompleteness determination is **Attachment 5**.

The City retained Donohue & Associates, Inc. and Trilogy Consulting LLC to review and evaluate the Town's proposal to build a water system. Donohue's review identified numerous issues about the design and cost estimates of the Town's proposed system. The Donohue Report is **Attachment 7**. Trilogy's review provided an estimate of projected water rates. The Trilogy Report is **Attachment 6**. Their reviews raise significant issues about the Town's proposed water system. A discussion of those issues follows.

**Concerns about Sandstone Aquifer and Location of Wells.** Donohue raises numerous concerns about the Town's proposed water source:

- The Town is designing its system for 1,500 gpm capacity. The sandstone aquifer the Town proposes to use may not be capable of sustaining that level of production. The projected drawdown of 220 feet at the Town's proposed pumping rate is substantial and raises significant concerns regarding long-term well performance and aquifer stability.

- Two water supply wells are needed to provide firm capacity. The Town assumes that two wells can be sited within the same municipal park parcel, approximately 260 feet apart. This assumption is highly unlikely to be feasible. The proximity of the proposed wells makes interference effects almost certain, which would further reduce individual well yields.
- The Town's Engineering Report acknowledges the probable need for a third production well (if its other wells cannot individually produce 1,500 gpm) but assumes that all three wells could be constructed within the same park parcel. Given the anticipated drawdown and spacing requirements, the likelihood of successfully siting multiple high-capacity wells within a single small area is very low. The Town's Engineering Report therefore greatly underestimates the potential cost and complexity associated with securing and developing additional well sites elsewhere in the Town.
- The sandstone aquifer lacks a continuous impermeable geologic formation to protect it from PFAS contamination. The Town's Engineering Report indicates that the only barrier to downward migration of PFAS is the low-permeability Eau Claire Formation which is a mere 5 feet thick at the well site, may not be laterally continuous, and may allow a connection from the sandstone bedrock to the upper sand and gravel formation.

Radium in the Town's Proposed Source Water. The Town's water source is contaminated with radium at almost twice the drinking water standard. This will require treatment (just as the presence of PFAS in the groundwater would require treatment). The Town's Engineering Report does not adequately address the design, operation and maintenance, and costs of a radium removal system. According to Donohue:

- The Town's Engineering Report proposes to use a hydrous manganese oxide (HMO) filtration process for radium, manganese, and iron removal, but does not address radon off-gassing or mitigation measures, which are typically necessary for groundwater systems treating radionuclides. The omission of radon considerations represents a notable regulatory and operational deficiency, especially since the plant will be located in a residential neighborhood.
- The Town's Engineering Report suggests two large horizontal pressure filters, which would produce large backwash volumes for cleaning the filters. The Engineering Report, however, does not account for the radionuclide concentrations expected in this waste stream or the impacts these flows will have on the downstream wastewater collection and treatment system. This backwash water will contain measurable quantities of radium-bearing solids, requiring proper handling and potentially permitting under Wisconsin Department of Health Services (WDHS) or DNR regulations.
- The Town's Engineering Report does not include complete treatment facility sizing information. According to Donohue, the filter vessel dimensions, building footprint, and interior space allocations appear undersized for a facility of this scale, and no detailed layout or verification of compliance with NR 811 spacing and access requirements is provided. Similarly, it is unclear if redundant pumping equipment is provided throughout the treatment



process, including backwash supply, backwash reclaim, backwash waste and high service pumping.

- Sludge management practices are not described in the Town's Engineering Report. The report lacks a plan for storage, handling, or disposal of radium-containing solids. The absence of these critical design elements makes it difficult to assess whether the proposed treatment facility is properly sized or feasible for long-term operation.
- The Town's Engineering Report does not adequately address the handling and disposal of radium-bearing waste generated by the proposed treatment process. Radium will continue to accumulate in the pressure filters, and when backwashed, will be dislodged in both backwash solids as well as suspended in backwash water. Because radium removal processes typically produce radium-laden sludge, it is expected that the majority of the radionuclide mass would accumulate in solids rather than remain in solution. Proper management of this sludge may necessitate a DHS radioactive materials permit, depending on radionuclide concentrations and disposal methods. Even with careful management of backwash intervals, the tank may need to be periodically cleaned and the sludge removed for landfilling.
- The Town's Engineering Report does not include any sludge characterization, handling, or disposal plan, representing a significant deficiency. Without this information, the feasibility, regulatory compliance, and long-term operational impacts of discharging radium-bearing waste to the City's wastewater treatment facility cannot be fully evaluated.

Water Tower Too Small. The Town proposes to construct a 700,000-gallon elevated storage tank. Storage facilities must have sufficient capacity for domestic demands and fire flow, operating storage, the daily fluctuation of water to provide tank turnover and appropriate pump operation. Donohue indicates the storage volume should be higher.

- The Town's proposed volume is based on a two-hour fire flow requirement. Insurance Services Office (ISO) and industry guidance typically recommend providing storage for a three-hour fire flow event.
- In the case where a filter is in backwash, storage will be needed to supplement domestic (non-fire flow) demands. Engineering calculations indicate that for this purpose the tank volume should be at least 765,900.

Cost Estimates Too Low. Donohue reviewed the cost estimates in the Town's Engineering Report and prepared an independent evaluation of costs. Donohue's findings concluded:

- The Town's capital cost estimates appear low. Assumptions related to building square footage (8,500 SF assumed) appear to be too low and assumptions related to well capacity are likely too high. There is a lack of redundancy in critical treatment components such as aerator, backwash supply, clearwell and pumping. Also, the Town's estimate only includes costs for two wells even though it is likely that three wells will be required.

- Capital costs for water main piping are generally low, especially given that construction will not take place for several years and that funding will require federal wage rates and preference for domestic products.
- Contingencies are included at only 10% of estimated construction costs. At this stage of project development, a higher contingency is more appropriate.
- Project costs include 50% of general street construction costs but WDNR guidance for the Safe Drinking Water Loan Program allows only 20% of these costs to be eligible for funding.
- Operation and maintenance (O&M) costs are significantly understated. O&M costs should be increased to reflect (i) power consumption based on the requirement that the treatment system will need to use on-peak power; (ii) increased chemical costs; and (iii) reasonable wages for staffing based on the significant time for construction and startup of a new facility and working with property owners to connect to the new system and abandon private wells.
- The total operating expenses of \$396,000 are low compared to an average of \$550,000 reported by similar size water utilities in Wisconsin, according to the PSC.

Donohue's independent evaluation of costs estimated project capital costs at \$70,297,004 (as opposed to the Town's estimate of \$64,775,000). Donohue's capital cost estimate is higher even though it excludes 80% of street repair costs.

Donohue's independent estimate of O&M costs is \$598,973 compared to the Town's estimate of \$396,000.

High Water Rates. Trilogy Consulting reviewed the cost estimates from both the Town's Engineering Report and Donohue in order to provide a projection of water rates based on standard PSC rate-making, as the PSC would ultimately set the water rates for any new utility. **Attachment 6** is Trilogy's Report documenting its analysis. The Town is required to submit projected water rates based on PSC rate-making with its construction application to the PSC but it has so far failed to do so.

The Town's Engineering Report and its PSC application includes numerous assumptions on project financing that will have a direct impact on water rates. The Town assumes that it will receive \$17.3 million in grants for the project (USDA-RD Grant of \$8,540,000; EPA Community Grants x2 of \$3,666,000; and a SDWLP PF – General and Emerging Contaminants of \$5,100,000). The Town has not provided documentation that it has actually received any of these grants. In fact, Campbell was not included in the DNR's latest Safe Drinking Water Loan Program (SDWLP) project list, whereas the City of La Crosse's Highway 16 water main project was.

The Town's 2025 Engineering Report also reduced its cost estimate for street reconstruction. In the Town's 2024 Engineering Report, the Town estimated the cost of full width reconstruction of Town streets would be \$21,200,000. In its 2025 Report, however, the Town lowered its estimate to \$14,500,000 to just repairing Town streets and also provided the caveat that the

estimate assumes that milling the existing pavement will also salvage sufficient material to provide ½ the base course for the street repairs and that the Bainbridge Street repair will only consist of repair of half of the street due to a future County Highway project.

If the Town's estimated cost estimates are used, Trilogy's analysis showed that an average residential customer in the Town would pay \$152.76 per month for water service, or \$1,833.06 per year. This includes fixed charges of \$81.40 per month plus \$14.42 for every 1,000 gallons of water used. For Class C utilities (those with between 1,000 and 4,000 customers), this amount would be more than twice the amount paid by a similar customer served by any other utility in the state.

Trilogy's rate estimate assumes that the Town will not collect a payment-in-lieu-of-taxes (PILOT) from the utility even though most utilities pay a PILOT to the municipality. This estimate also includes the Town's assumption that it will receive \$17,306,000 in grants. If the Town receives less grant money than it estimates, the Town will have to rely upon additional loan funding that will drive the cost of water rates higher.

Trilogy also estimated water rates using Donohue's independent construction and O&M cost estimates. Using these estimates, and still assuming the Town would receive \$17,306,000 in grants, water rates would increase to \$194.40 per month for an average residential customer, or \$2,332.82 per year. This would be comprised of fixed charges of \$101.50 per month and water use charges of \$18.86 per 1,000 gallons of water used. The fixed charge alone would make the proposed system the most expensive in the state for Class C utilities, even before paying for any water used. If one assumed that the Town would receive only half of the grants it projects, water rates would be over 15 percent higher yet, resulting in an annual average residential bill of about \$2,706. Using this set of assumptions would also mean that an additional \$4,455,000 of street repair costs, or a total of \$11,715,000, would be funded by general obligation borrowing and the property tax levy.

This analysis demonstrates the financial risks involved in the Town's construction of a new water system. The Town's estimated costs and rosy assumption of substantial grants result in water costs of over \$1,800 a year as a best case scenario. Costs could easily exceed \$2,700 a year or more for water service alone. Noteworthy is that the PSC estimated that water rates could result in customer bills as high as \$302 per month or \$3,624 a year if no grant is received and the full water system is implemented.

User rates for a proposed Town of Campbell water utility would likely be some of, if not the, highest in the state, using the quarterly water bill comparison tool on the PSC's website.<sup>23</sup>

Additional Costs. The construction of a Town water system will also result in additional costs beyond water rates. Property owners will be responsible for installing private service laterals that are needed to connect buildings to the water main. Those costs are borne directly by the connecting customer, and the Davy Engineering Reports estimates that an average residential water service would cost \$7,500. In addition, property owners will be responsible for abandoning their private wells. There will be substantially increased sewer costs as the 70-year

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<sup>23</sup> PSC Quarterly Water Bill Comparison: <https://apps.psc.wi.gov/RATES/waterbill/default.aspx>

sewer lines will almost certainly need to be replaced when the road is dug up. The Town has not provided any information related to the cost of sewer main replacements. There will also be road repair/reconstruction costs to be borne by the general fund. A decision will also need to be made whether to upgrade roads with curb and gutters. All of these costs would have to be borne by the Town (or proposed village).

**Operational Requirements Demanding.** The Town only proposes to hire one additional operator and a part-time administrative aide to manage the utility. As the discussion of the City's system shows, operating a water utility is demanding and the Town is grossly underestimating what it takes to operate a well-run utility. Managing a water utility in the State of Wisconsin brings additional complexities, as utilities must comply with all accounting and reporting requirements of the PSC. The Town's auditor has routinely noted shortcomings in the Town's policies and staffing to properly manage its accounting practices, and PSC accounting requirements would only create further complications for Town staff. Town staff would also have to gain knowledge of PSC rules and regulations regarding construction activity. The Town, in its incorporation submittal, not only admitted but promoted the fact that it was able to install water main and hydrants that are non-functional when it reconstructed Pierce Ave. in 2024. However, there are two rules regarding PSC authorization for construction that may have been violated: the first is the cost threshold for required construction authorization; it is unknown whether the cost of the Pierce Ave. project would have required authorization based on cost alone. The second is that utilities cannot get around construction authorization requirements by phasing in larger projects over multiple years. This is the case for the Pierce Ave project, as it is clearly a part of the larger application to construct the entire water supply and distribution system in Docket 935-CW-102. It is unknown if the PSC is even aware of the Pierce Ave project; there was no mention of it in any of the supporting information submitted to date regarding approval of the construction of the new water system. Normally, if during the course of a PSC proceeding, it is discovered that there may have been a violation of PSC regulations, an investigation docket would be opened to make that determination.

### ***Comparison of Services***

Town residents would benefit greatly from obtaining water from the City as opposed to building their own water system.

- Water supply could be provided much more quickly – especially in the areas where a City water main already exists. The City already has water mains that extend to the Airport, the Airport Industrial Park, the Interstate Exchange Industrial Park and Hiawatha Island. Properties south and west-southwest of the airport with the highest levels of PFAS in private wells could quickly be attached to the City's existing mains along Fanta Reed Road and Airport Road. On Hiawatha Island, a service lateral would just need to be installed in order to serve a property that is currently located in the Town; a duplicate and redundant water main along Nakomis would not be necessary.
- Connection to the City's water system would be at least **\$30 million** cheaper than building a new Town water system. No wells would need to be installed, no treatment system would need to be installed, no elevated storage tank would be necessary, and duplicate and

redundant water mains along Nakomis Avenue, Fanta Reed Road and Airport Road would not be required.

- The City has sufficient supply to provide the Town with water. No additional wells or treatment would be necessary.
- The water source available would be more reliable. It is questionable whether the sandstone aquifer can produce the volume of water needed by the Town. This water source is also contaminated with radium and there is a potential that it could become contaminated in the future with PFAS. The City's water source, located in the south part of La Crosse, is highly productive and more predictable.
- The City provides high-quality water that meets all safe drinking water standards and, despite the claims of Town officials, the water that the City provides to its customers is not contaminated.
- The cost of City water would be lower and much more predictable. Costs would be shared over a much larger customer base. No additional wells, treatment or storage would need to be constructed. The cost of constructing a Town water supply system is high and unpredictable.
- The operation and management of a City water system would be experienced and skilled. Water systems are highly regulated and the City is experienced in complying with these requirements. The Town does not have this experience and given its size it would be difficult to employ highly qualified operators.
- The fire protection provided by the City system would be significantly greater. The water supply and storage proposed to be constructed by the Town is too small to fight a major fire like that experienced last year where over one million gallons of City water was used. There is no way the Town's system would be able to provide this amount of water for such an extended time. The Town's water system will not be able to provide fire flow sufficient to adequately protect an industrial operation like J.F. Brennan's. In constructing its system, the Town would disconnect from the City's system and eliminate the connection that allowed the City to provide the water needed to fight a large industrial fire like the one that occurred last year. Rejecting the Town's incorporation request will allow those industries and properties that need a higher level of fire protection to annex to the City.

The Town's proposed water system is too costly and unreasonable risky. The quicker, safer, more predictable and reliable, and more cost-effective option would be to obtain water service from the City.

The Town did approach the City about extending municipal water service to the Town, but the Town was adamant that any negotiations about water service could not include any discussion of a boundary agreement or annexation. See the letters between the City and Town dated January 4, 2022, September 1, 2022, October 6, 2022, provided as **Attachment 9**. See also the Testimony from City Attorney Stephen Matty, attached as **Matty Testimony and Exhibits**.

The Town has never been willing to negotiate an intergovernmental agreement with the City of La Crosse which involves a compromise on boundaries in exchange for wholesale water service. In light of the Town's refusal, there have been no discussions about the City providing water service to the Town.



## **V. OTHER REGIONAL SERVICES**

### **Mass Transit**

#### ***City of La Crosse***

The City of La Crosse’s Municipal Transit Utility (MTU) provides safe and convenient public transportation services to the La Crosse area. The service area currently includes La Crosse, French Island, a portion of Onalaska, and La Crescent, Minnesota. The service is owned and operated by the City of La Crosse.

MTU has 47 full-time employees, including 34 bus drivers, 7 maintenance staff, 6 administration employees, and 8 part-time bus driver positions. All drivers have commercial driver licenses and receive additional training from MTU in normal operations, ADA securement and sensitivity, de-escalation, and bloodborne pathogens. MTU staff also support MTU’s mobile pay and Transit app, and provide notifications and updates via the app and MTU’s social media.

The MTU fleet consists of 24 buses, including 2 electric, 5 hybrid, and 17 clean diesel, and one small shuttle for service to La Crescent. As part of MTU’s long-range plan, MTU will replace four buses before the end of the year, two of which will be electric. All MTU buses are ADA compliant. MTU operates out of two locations within the City of La Crosse—the Municipal Service Center and the Transit Center.

The annual operating budget of MTU in 2025 is \$7,091,502. Over 50% of this budget is covered by federal and state apportionments, which are competitive grants that MTU must apply for every year. As a condition of funding, the City must contribute a “local share” of 50%. Of this “local share”, the local funding is 20%, with state funding providing the remainder. Local funding comes from the tax levy in the City, service agreements with other communities and other partnerships, and advertising revenue. Fares are offset from there.

Bus routes consist of 8 fixed-routes and 2 flex-routes offering transportation throughout the area, with most routes operating seven days a week. A map of MTU’s bus routes is **Lorentz Exhibit 1**, also attached as **Map 15**. Specialized or Paratransit service is available for individuals whose disabilities prevent them from using fixed route service within the City of La Crosse.

MTU provides bus service on French Island and within the proposed village under an annual contract with the Town of Campbell, discussed in more detail below.

MTU Routes 7 and 8 provide the primary service to French and Hiawatha Islands. See **Figure 17**, below, which is a portion of **Map 15**. Route 7 extends through much of the proposed village and also serves properties within the City on French and Hiawatha Islands, including the City’s Airport. Route 8 also serves proposed village residents by providing access via Clinton Street to the City of La Crosse North Branch Library, Northside Elementary School, Logan Middle School, Logan High School, and a selection of industrial employers and commercial retailers.

Route 8, as well as Routes 6 and 9, is directly accessible via the City’s Clinton & Caledonia

Transfer Point. This transfer point is approximately 2 blocks east of the east foot of the Clinton Street bridge, which is within walking distance of some proposed village residents living on the south side of the proposed village.

**Figure 17**



Within the Town of Campbell, the City offers what is called “route deviation”—while the bus follows the identified Route 7, the bus will deviate off that established route to pick up or drop off a passenger at a requested location.

In 2024, there were 25,901 rides on Routes 7 and 8, including Town of Campbell residents going to work at the Mayo or Gunderson clinics, and students looking to get to and from Logan Middle School and Logan High School for school and extracurricular activities. MTU works with local schools to provide a discounted “Max Pass” for students ages 18 and under for each school semester. MTU also offers a U-Pass to students attending local colleges.

MTU engages in mobility-based outreach for senior programming and visits assisted living facilities to help seniors familiarize themselves with the bus service. MTU also hosts free ride events, including not charging fares on national voting days and providing a Safe Ride service.

The information in this section is supplemented by the Testimony from Adam Lorentz, La Crosse Director of Transit, attached as **Lorentz Testimony and Exhibits**.

### ***Proposed Village***

The proposed village will not be able to provide its own bus service but will seek to annually contract with the City to obtain bus services. The City's current contract with the Town provides bus service to the Town in exchange for a Town payment of an annual fee based on service hours. This arrangement resulted in a 2025 fee of \$37,419 and a 2026 fee of \$43,282 to the Town.

The Town also received service from La Crosse County Human Services vehicles which provide service to the whole County.

### ***Comparison of Services – Mass Transit***

Without the City, the proposed village would not be able to have bus service. The Town receives a premium bus service due to its proximity to the City of La Crosse. The initial cost for the proposed village to establish its own bus service would be prohibitive due to the need to hire multiple employees for one service, purchase two buses, purchase maintenance equipment and/or budget for ongoing maintenance, pay for technology services to support mobile pay and tracking, apply for grant funding and complete regular audits, and obtain the required certifications with the State and Federal Transit Authority. There would also be significant ongoing operation and maintenance costs.

As an additional ongoing matter, Town residents benefit from the City's administrative staff who have the expertise and capacity to apply for the grants that keep the Town's share of costs for the service so low. As MTU relies on the City's information technology, legal, and human resources departments, the Town is also benefitting from this higher level of service without contributing to the cost.

## Airport

### *City of La Crosse*

The La Crosse Regional Airport is owned and operated by the City of La Crosse. It is located at the north end of French Island within City limits. The Airport is a certified commercial air carrier airport serving the greater La Crosse Region, with schedule commercial airline service, and is generally the 5<sup>th</sup> largest airport in the State of Wisconsin in terms of passenger use. It sits on 1,380 acres on French Island within the City of La Crosse City limits. It consists of a two-story passenger terminal building, three runways, a control tower, multi-size corporate and private hangers, several parking lots, a car wash, a Fire Station and garage, and a maintenance building.

The Airport is guided by the Aviation Board, which advises Airport administration and the City's Common Council. The Airport has 17 full-time staff positions, along with some part-time staff. An organizational chart is attached as **Roberts Exhibit 1**. Staff include:

- Director
- Deputy Director
- Business Manager
- Administrative Specialist
- 4 Airport Operations Coordinators
- 1 Airport Maintenance Supervisor
- 1 Mechanic II
- 2 Lead Mechanic Technicians
- 3 Mechanic Technicians (facility/grounds)
- 2 Custodians

The public passenger terminal is located on Airport Road north of Fanta Reed Road. American Airlines serves the airport and connect to their hub in Chicago with several daily flights. In 2026, Allegiant Airlines will also establish flight services at the Airport, offering nonstop flights to two additional locations: Phoenix/Mesa and Orlando/Sanford.

In addition, general aviation service, offering piloted charter flights and plane rental is available at the general aviation center on the east side of the field. The fixed base operator offers full frame and engine, and basic instrument and electronics maintenance capability for general aviation aircraft. The Airport also leases space to the La Crosse Composite Squadron of the Civil Air Patrol, which is a civilian auxiliary of the U.S. Air Force.

The Airport provides or facilitates other benefits or services to the area. The Airport:

- Hosts four TSA pop-up pre-check events each year where individuals can undergo a preemptive security screening to be able to bypass general TSA screening for future flights. Over 400 people take advantage of this opportunity each time TSA offers it.
- Serves as an incentive for attracting businesses to the area that utilize public and private air transport.
- Is the closest commercial airline to the U.S. Army Reserve base, Fort McCoy.
- Participates in and plays hosts to community events surrounding aviation, including Airfest, featuring the Navy Blue Angels.
- Participates in other community events, many targeted at the area youth.
- Hosts rental car companies.

The City reviews long range goals for the Airport, as set out in the Airport's Master Plan. These include goals relating to expanding the terminal and lengthening the crosswind Runway 13/31.

Additionally, the City has adopted a Land Use Ordinance outlining land use, building and height restrictions within 3 miles of the La Crosse Airport property boundary. The purpose of this ordinance is to protect the taxpayer's investment in the airport by ensuring that the approaches to the airport are protected from obstructions or otherwise incompatible land uses. All of the Town of Campbell is included within the 3-mile protection zone. This requires that all building permits within the Town of Campbell must also be reviewed by the City of La Crosse for compliance with land use and height and determine whether an Airport Permit is required. After review by La Crosse's Building and Inspections Division, final review is then forwarded to airport staff.

### ***Proposed Village***

The La Crosse Regional Airport, which is located in the City of La Crosse and owned and managed by the City, serves residents of the proposed village. The Town Incorporation Report highlights the importance of the City's Airport to the region, but incorrectly attributes the regional importance of the City's Airport to the Town rather than the City. Town Incorporation Report, p. 13. The Town undoubtedly shares in the benefit of the City's Airport, but that is solely due to the City's efforts to provide this regional service.

### ***Comparison of Services***

The City's Airport provides air service to the greater La Crosse region bringing economic benefits, travel opportunities, and other services. The proposed village provides no such service.

## Convention Center and Arena

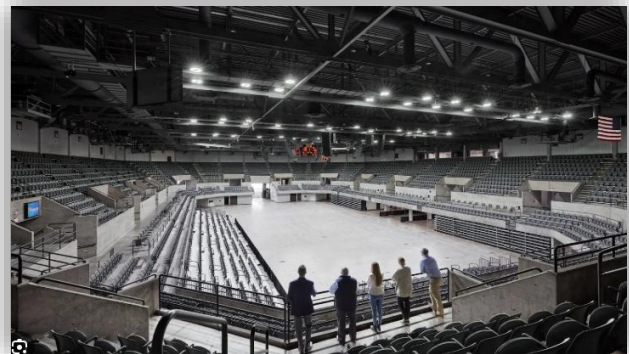
### *City of La Crosse*



The La Crosse Center is a City-owned and operated multi-purpose facility that has convention and meeting spaces as well as an arena. Overall, there is approximately 120,000 square feet of meeting and exhibit space within the facility, including 2 ballrooms, 10 dedicated boardrooms, and a terrace overlooking the Mississippi River. It has reserved seating for approximately 8,000 people. The Center hosts conferences, conventions, trade shows, wedding receptions, banquets, meetings, concerts, and

productions. In 2024, over 200 events were held at the Center. Anyone can book an event at the La Crosse Center regardless of residency. Among its many events, it hosts Logan High School graduations and area high school proms. Collectively, the La Crosse Center generates about \$40 million in tourism-related dollars to La Crosse County every year.

The La Crosse Center has an annual operating budget of approximately \$8.0 million funded by revenue that it generates and room tax. However, the City supports the Center through capital funding for equipment and projects, and continues to contribute a portion of the debt service for the Center. Both the La Crosse Center Board and the City's Common Council oversee the La Crosse Center, and receive regular financial reports and updates.



The information in this section is supplemented by the Testimony from Jason Odegaard, La Crosse Director of Parks and Recreation, attached as **Odegaard Testimony and Exhibits**.

### *Proposed Village*

The proposed village does not have any public convention space.

### *Comparison of Services – Convention Center and Arena*

The proposed village does not provide anything like the City's La Crosse Center. However, the proposed village benefits from the events available to its residents held at the La Crosse Center and the economic boost that the La Crosse Center brings to the entire region.



## SECTION 2(b) CONCLUSION

This Section 2(b) analysis examined:

- General government administrative services, including clerical, financial, planning, building inspection, assessment, legal, human resources, and information technology capabilities;
- Public safety services, including fire and emergency medical protection services and police protection;
- Social services, including parks and recreation facilities and offerings, library services, and senior services;
- Public works services, including engineering, streets, solid waste and recycling collection, flood prevention and response, stormwater conveyance, sanitary sewer service, and potable water service; and
- Regional services provided by the City, including its Municipal Transit Utility, Airport, and the La Crosse Center's convention center and arena.

This analysis demonstrates that the City is already providing many of the urban services that the Town of Campbell and its residents need and rely on. It further demonstrates that the City could provide more, better, and more efficient services to the residents of the proposed village than the newly incorporated village would provide.

The proposed village is an urban community with urban problems and needs. However, the proposed village will continue to operate with services more appropriate to a rural town and with budget constraints that prevent the expansion of services. Moreover, the Town's determination to avoid comprehensive cooperative discussions with the City to provide services that the Town needs has resulted in inefficiency and a proposal to install a water system that when compared to receiving City water, will take longer to construct, be less reliable, provide less fire protection, and cost substantially more.

For all of the reasons set forth in this analysis, the proposed village cannot meet the § 66.0207(2)(b), Wis. Stats., standard for incorporation.

## **SECTION 2(d) IMPACT ON THE METROPOLITAN COMMUNITY**

The fifth incorporation standard to be applied is found in § 66.0207(2)(d), Wis. Stats., and requires the Board to consider whether the proposed incorporation is in the public interest upon consideration of:

The effect upon the future rendering of governmental services both inside the territory proposed for incorporation and elsewhere within the metropolitan community. There shall be an express finding that the proposed incorporation will not substantially hinder the solution of governmental problems affecting the metropolitan community.

If an express finding that the proposed incorporation will not substantially hinder the solution of governmental problems affecting the metropolitan community cannot be made, the proposed incorporation cannot be determined to be in the public interest.

The “metropolitan community” as defined in § 66.0201 (2) (c), Wis. Stats., includes the City of La Crosse and “all the contiguous area which has a population density of 100 persons or more per square mile, or which the department has determined on the basis of population trend and other pertinent facts will have a minimum density of 100 persons per square mile within 3 years.”

## **SECTION 2(d) ANALYSIS**

The incorporation of the Town of Campbell will substantially hinder the solution of governmental problems affecting the La Crosse metropolitan area and therefore is not in the public interest.

This standard and the problems faced by metropolitan communities was thoroughly discussed in the 1973 decision and 1977 decision. With respect to the proposed incorporation, the 1973 decision stated:

In the metropolitan context, the territory must be considered small and nonviable. Though the total area exceeds 12 square miles, the developable portion of it amounts to slightly more than two square miles. Because of the flood control requirements on one side and the existing municipalities on the other, it has no potential for expansion. It is nonviable in the same sense that it is and is projected to remain dependent on the rest of the metropolitan area for employment of its resident population and for the majority of goods and services needed by its residents. . . .

In many ways, the problems of a metropolitan area are the problems of the central city of the area. The central city, as the hub of economic and social life of the area, is required to provide adequate streets and highways for traffic movement, to provide for mass transit service where feasible, to provide major portions of the park system and recreation facilities, to provide public housing for low-income

families and individuals, and in some cases to provide sewer and water utilities, fire protection, and other public services of areawide impact. Where the central city has the opportunity to extend its jurisdiction to approximately cover the area which generates a demand for such services and facilities, it is usually able to raise the necessary funds to provide them at a reasonable tax rate.

The 1973 decision included examples of metropolitan area problems, the solutions to which would be hindered by the proposed incorporation. Those examples included: (i) provision of streets and highways; (ii) provision of bus transit service; (iii) provision of air transportation facilities; (iv) provision of public utilities; (v) provision of public housing; (vi) inequalities in assessment practices; and (vii) unequal distribution of the tax base.

The 1977 decision included similar language and examples of similar metropolitan area problems whose solutions would be hindered by the proposed incorporation.

More recent incorporation decisions have also examined the proposed municipality's cooperation with municipal neighbors, denying petitions where the proposed municipality has failed to productively work with the major metropolitan neighbor on boundaries and other issues. See *Determination of the Incorporation Review Board*, June 17, 2011, In Re: The Incorporation of the Town of Lisbon, Waukesha County, Wisconsin as a Village ("2011 Lisbon Denial").

In the 2011 Lisbon Denial, the IRB denied the Town of Lisbon's incorporation petition in large part because of its failure to effectively work with its most significant neighbors.

[S]ignificant questions remain with regard to Lisbon's relationship with Sussex, Menomonee Falls, and Waukesha County. The fact that intergovernmental conflict exists at an institutional or elected official level is apparent. The metropolitan impact standard is directed toward official, institutional-type cooperation between governmental units. Because of the current level of conflict and the expressed desire to function independently from their neighbors and the County, the Board has concerns that incorporating Lisbon will hinder resolving regional problems.

Incorporation proponents cite the desire for increased authority and a desire to get out from under the influence of their municipal neighbors. While this sentiment is understandable, it does not lead to confidence that regionalism is a priority. Recent past incorporation petitions such as Summit (2009) and Richfield (2006) were different because those communities led their respective regions. For example, Summit developed boundary agreements with all of its municipal neighbors, transferring territory to make the petitioned area compact, arranging for regional services, and establishing the regional Pabst Farms Development.

The intergovernmental situation is especially problematic with Areas 3 and 4. These are areas with fragmented and confused municipal boundaries that are far from the bulk of Lisbon. Residential neighborhoods stretch across these boundaries in haphazard and seemingly unplanned fashion. Servicing these areas

is difficult and inefficient, and unfortunately, incorporation would result in freezing these problems in perpetuity. However, left under Town jurisdiction, territory transfers in the future to improve the municipal boundary interface at least remains a possibility.

2011 Lisbon Denial at p. 63.

The Town of Campbell is in a very similar position with respect to intergovernmental cooperation with the City of La Crosse. The Town refuses to engage with others in ways that address not only Town issues but the larger regional issues. This extends to at least three critical issues for the area—boundary issues, fire protection, and water service.

The incorporation would also hinder the solution of other issues facing the metropolitan community and contribute to the existing inequity of the City supporting regional services and the solution of regional problems without contribution by the Town. As the below analysis shows, the Town of Campbell cannot meet its burden to show that the proposed incorporation will not substantially hinder the solution of governmental problems affecting the metropolitan community.

## Confusing Boundaries and Services

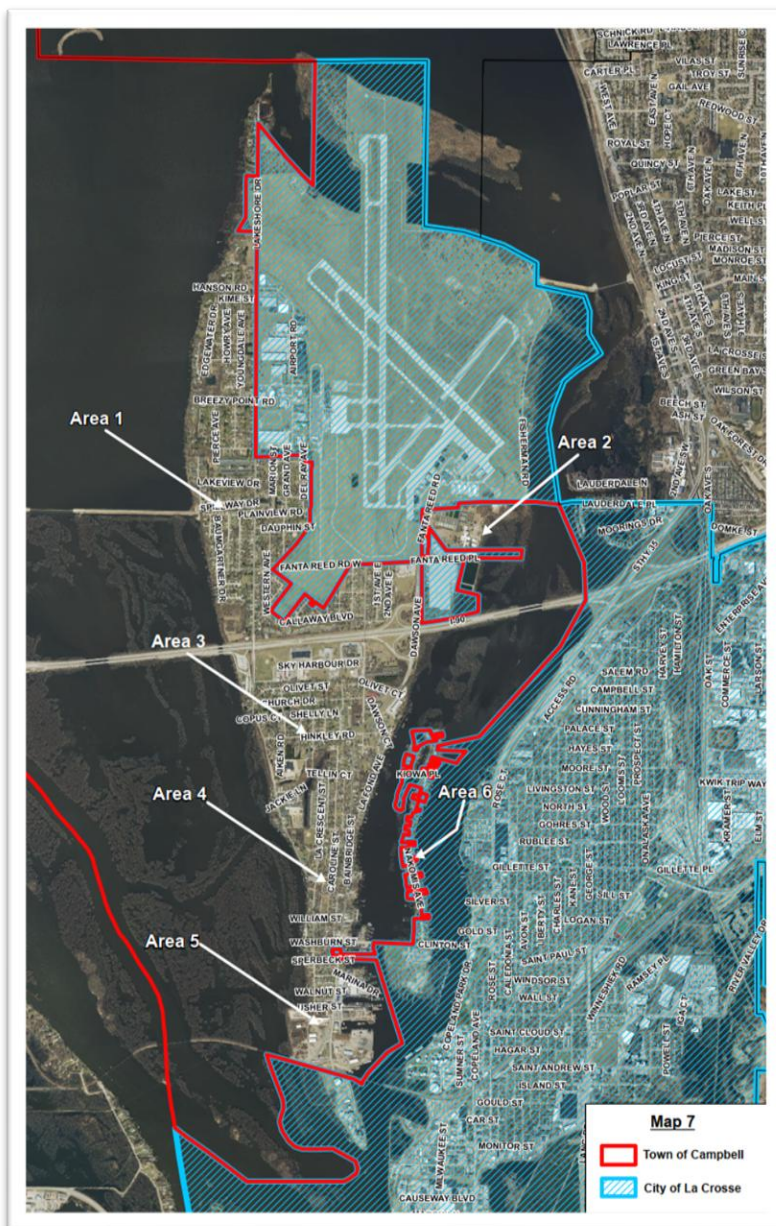
The proposed village's boundaries with the City are jagged, creating disconnected areas within the Town and unclear political boundaries. See Maps 01-07.

This has already resulted in inefficiencies in providing services to these areas, including fire and EMS protection, street maintenance and improvements, and refuse and recycling.<sup>1</sup> The Town's proposed water system, if implemented, would only exacerbate these issues by adding an additional and unnecessary water main adjacent to the City's existing water main down Nakomis Avenue and Clinton Street on Hiawatha Island. This will also result in the disturbance of a street that, while not up to City standards due to its shared-use with the Town, is otherwise in decent condition. Incorporation will also hinder additional annexations on Hiawatha Island that will eventually lead the City to be able to invest in providing curb, gutter, sidewalks, and stormwater management on Nakomis Avenue.

Locking in the existing boundaries will also entrench the political issues related to who represents residents on Hiawatha Island, making campaigning on the Island confusing and ensuring that the neighborhood must seek resolution of any issues from not one, but two municipal governments in perpetuity.<sup>2</sup>

In addition, the proposed village will exacerbate land use problems by locking in inconsistent zoning and land use between City and Town parcels. The City has a fully staffed Planning and Development Department that works to develop and implement cohesive, appropriate, and best-

**Map 7**



<sup>1</sup> See **Schott Testimony**, p. 24-25, and **Gallager Testimony** pp. 10-12, 15, 27-28.

<sup>2</sup> See **Washington Spivey Testimony** p. 4 and **Dickinson Testimony** p. 3.

use development within the City. As discussed in Section 1(a), the Town has grown with land-use patterns that are haphazard at best and hazardous at worst. As long as the Town remains unincorporated, the City will continue to exercise extraterritorial plat review authority, providing a limited ability to ensure that future land divisions in the Town are consistent with City plans for the region. The City will also be able to offer its higher-level of services to developers interested in utilizing City resources or receiving City services in exchange for annexation and proper land use planning.

Unfortunately, the Town refuses to engage in discussions with the City involving boundary agreements and annexations. See **Matty Testimony**, pp. 4-6, discussed in more detail below.

### **Fire Protection**

Providing fire protection in the metropolitan community is a critical issue. As discussed in detail in Section 2(b), the City maintains a full-time professional fire department. Providing this service is expensive but required in an urban metropolitan area. The Town has no paid fire fighters but rather relies upon volunteers and mutual aid provided by neighboring fire departments. The City has consistently provided mutual aid in the Town in spite of receiving no reimbursement for its personnel costs and little or no mutual aid from the Town in return.<sup>3</sup> The proposed village does not plan to change how it provides or how much it pays for fire service.

While the Town benefits from mutual aid, it has refused to be part of a regional study on how better fire and EMS services may be provided to the greater region. The provision of fire protection services is becoming increasingly expensive and difficult to fund with tight municipal budgets. In addition, there are fewer volunteer fire fighters available. The study examined potential alternative service and funding models. See **Attachment 8** for a copy of the Wisconsin Policy Forum's report on shared fire and EMS service options for La Crosse County. Twelve other service providers took part in this study, including the municipalities nearest to the Town – the City of La Crosse and the cities of Onalaska and La Crescent – but the Town did not.

The proposed village's limited fire protection capabilities has an impact on the growth of the metropolitan area on French Island. The I-90 interchange area is ripe for commercial redevelopment and the southern area of French Island with both water and rail infrastructure is ready for industrial redevelopment. The proposed village's plan to install its own water system with limited fire protection capacity (and disconnect from the City's water lines), however, will greatly hamper such redevelopment. After disconnecting from City water, the proposed village will have no ability to fight a fire like that experienced just last year.

Incorporation will lock these issues in place. The City has a professional fire department with the types of training, paramedics, specialized teams, and apparatus appropriate for a metropolitan community. Incorporation will stifle development in the proposed village by industries needing the City's higher level of fire protection, reducing development and redevelopment opportunities. Existing property owners will remain susceptible to less than adequate fire protection.

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<sup>3</sup> *Id.*



Locking in the existing service issues and the existing reliance of the Town on its regional neighbors to provide needed fire protection and EMS services in the Town, will only serve to continue to hinder finding an effective regional solution.

### **Water Service**

The PFAS contamination of water supplies on French Island is a serious issue that has resulted in impacts both to private wells and to the three City wells which were shut down. The City has the capacity to serve the entire Town of Campbell, but just as important, the ability to serve the most impacted properties on French Island significantly faster and cheaper than the proposed Town water system can. A decision, however, to provide water from the City's water system (a system paid for by existing City customers) outside of current City boundaries cannot be made in a vacuum.

The Town did approach the City about extending municipal water service to the Town, but the Town was adamant that any negotiations about water service could not include any discussion of a boundary agreement or annexation. See the letters between the City and Town dated January 4, 2022, September 1, 2022, October 6, 2022, provided as **Attachment 9**. See also the Testimony from City Attorney Stephen Matty, attached as **Matty Testimony and Exhibits**.

The Town has never been willing to negotiate an intergovernmental agreement with the City of La Crosse which involves a compromise on boundaries in exchange for water service. In light of the Town's refusal, there have been no discussions about the City providing water service to the Town.

The Town's push to build its own water system in order to avoid a boundary agreement or annexation fails to fully acknowledge the risks and responsibilities associated with such a path. The cost estimates provided by the Town's engineers represent a best-case scenario. What if less grant money is received than anticipated? What if another well is needed? What if the radium in the groundwater is more expensive to treat and dispose? What if PFAS contaminates this lower depth of groundwater too? If the Town engineer's rosy assumptions do not come to pass, water costs will be much, much higher. Obtaining water from the City, on the other hand, would cost at least \$30 million less while avoiding these risks.

Incorporation of the proposed village will hinder the common sense resolution of this issue. Just as for Lisbon in 2011, the desire to function independently should not override negotiating the best solution for the region.

### **Equitable Payment for Services Used**

As the geographic and economic center of the region, the City of La Crosse provides many public services that are available to the Greater La Crosse Region. These services were discussed in detail in Section 2(b) and include but are not limited to:

- Parks and recreation facilities, including extensive recreational trails, playgrounds, shelters, and sporting facilities, and the public beaches, pools, splash pads, skating rinks,

and more which are not available in the Town, and programs, including extensive youth, adult, and senior programs.

- Support to the La Crosse Public School District, including police protection, street control for events, and mayor, fire, library, and planning programs and visits to schools.
- Library facilities, materials, and programs, including extensive youth, adult, and senior programs.
- Fire protection services (as previously discussed).
- Youth, adult, and senior programs through various City departments.
- Bus service through the City's Municipal Transit Utility.
- Air travel through the City's Regional Airport.
- The La Crosse Center's convention center and arena.

The proposed village already uses and relies on the City to provide these urban level services to its residents, meaning that the proposed village need not provide or fund them, unfairly reducing the taxes paid by its residents. In one of the more glaring examples, two adjacent households on Hiawatha Island utilize many of the same publicly available City services, but one neighbor pays for them while the other does not.

Most of these services are largely funded by the City's general budget, while the others which are supported by user fees or other funding sources are nevertheless reliant on the City's general government services to keep them viable. This all comes at increasing cost to the City, without adequate and equitable payment by all communities who benefit. See **Washington-Spivey Testimony**, p. 6-7.

As the City annexes land for development, redevelopment, or when residents need greater services not otherwise available (like water), these properties begin contributing to the City services already used by them. The wholesale annexation of the Town would result in a material contribution to cover the cost of these City services. Since most general government services that the Town needs can be provided by the City with existing or minimally increased staff, the combined community resources would increase services, decrease costs, or both. This in turn would provide substantial benefit to the greater metropolitan area.

Incorporation of the proposed village will allow the proposed village to continue to utilize many City's services without contributing to their costs. This places an increasing and inequitable burden on the City, which could lead to an impact in its ability to provide the types of services that the region needs and uses.

### **Equitable Support to Non-Profit Entities**

Similar and related to the service issue, within its boundaries, the City provides all or a vast majority of the medical, social, cultural, educational, recreational, and religious needs of the La Crosse area, and hosts a number of La Crosse County government facilities. A majority of these activities occur on properties that are exempt from local real property taxes, but otherwise continue to require City resources, including public safety and transportation infrastructure, to support.

As the City expands via annexations, support of these non-profit entities become spread amongst more of the population which relies upon them. If the proposed village incorporates, that permanently limits the portions of French and Hiawatha Islands which are contributing to supporting these services and properties. Residents of the proposed village will continue to benefit from the location of these non-profit services in the City without contributing to the ongoing costs of maintaining and protecting them within City limits.

### **Redevelopment of Commercial and Industrial Areas and Nuisance Abatement**

The commercial and industrial areas on French Island remain underdeveloped or experiencing blight. The Town lacks the staff, expertise, and resources to engage in the broad development, redevelopment, nuisance property management, and floodplain management that is needed in an urban community.

The region needs to best utilize its resources to remain and grow as an employment center. The City of La Crosse is squeezed between the Mississippi River on the west, bluffs on the east, and the City of Onalaska on the north. This is a double-edged sword: it leaves little room for outward growth but has made the City an experienced partner in redevelopment and nuisance management. See **Washington-Spivey Testimony**, pp. 6-7; **Trane Testimony**; **Dickinson Testimony**, p. 5. The City is in the best position to take advantage of the major highway, railroad, water, and air transit infrastructure located on or near French Island, much of which is already provided or supported by the City.

The Town of Campbell is a prime location for City-supported development and redevelopment. Unfortunately, the proposed village would hamper the redevelopment of the I-90 corridor and the southern industrial area on French Island. The City of La Crosse has the proven ability to assist industrial and commercial expansion, including on French Island. The recent Ace Hardware distribution facility in the City's Airport Interchange Industrial Park is one example of new development that was only possible because of annexation. For the industrial properties, the City has sponsored Industrial Revenue Bonds in collaboration through the Wisconsin Economic Development Corporation to assist industrial business for expansion. There are several vacant parcels on Sky Harbour Drive which will likely continue to be underutilized by the proposed village, and there are similar constraints on redevelopment of the proposed village's southern industrial areas.

Incorporation will prevent leveraging the City's strong record of creating and managing Tax Incremental Districts (TID) to aid in development and redevelopment on French Island. This will hamper the potential economic growth of the region as a whole. Incorporation will also require the proposed village to take on many of the responsibilities currently managed by the County for floodplain and shoreland zoning and enforcement. The proposed village lacks the experience and resources to effectively take on this responsibility, which is critical for effective redevelopment within a floodplain.

### **Services to Seniors**

The Greater La Crosse Region has an aging population and the Town of Campbell has a population with a median age that is 10 years older even than that of the County. As individuals age, there is a greater need for expanded senior services and a greater burden on existing ones. As stated above, the City is already home to the vast majority of the medical facilities needed by seniors. The City is also home to many nursing facilities, assisted livings facilities, public housing options, and senior services which are needed by the region. Conversely, the proposed village has no identified senior services and just one County-run public housing option with 18 units. The City is already providing or hosting the services needed by the region's seniors. Incorporation would lock in the pattern of residents in the proposed village using City provided or hosted services without contributing to their cost. Conversely, if the proposed village were to instead annex to the City, the City could begin offering some of its senior services directly on French Island where they are most needed. The City could also assist in redevelopment to bring private senior services to French Island.

### **Unhoused**

Unhoused individuals are a regional problem needing solutions, but one that outlying communities like the Town of Campbell pass onto the County and the City. Unhoused individuals brought into the City for County services frequently stay in the City and utilize the City's resources. Incorporation will allow the Town to continue to avoid being part of the solution to meeting the needs of the area's unhoused population and, ultimately, finding ways to bring housing and stability to the group.

## **SECTION 2(d) CONCLUSION**

The incorporation of the Town of Campbell will substantially hinder the solution of governmental problems affecting the La Crosse metropolitan area and therefore is not in the public interest. The greater region faces many issues which the proposed village is either unable or unwilling to collaborate on. Another incorporated governmental body should not be created which would lock in place existing boundary issues, service discrepancies, development limitations, and inequities for payment for regional services and therefore hinder the solution of these metropolitan problems. The petition cannot meet the § 66.0207(2)(d) standard.

## **CONCLUSION**

The proposed incorporation should be dismissed. For the reasons set forth in this report, the area proposed for incorporation cannot meet the statutory standards set forth in § 66.0207.

The area proposed for incorporation – when taken in its entirety – is not compact or homogeneous. Most of the area consists of water, wetlands, federal land, or land in the floodplain. This undevelopable area has nothing in common with the limited amount of developed or developable area in the proposed village. The proposed village also does not provide the social or commercial needs of an incorporated community, relying on its connection to the City of La Crosse and others to provide for the needs of its residents. The proposed village is not compact and homogenous but rather is closely tied to the City. This same conclusion was reached in the 1973 decision and 1977 decision and there have been no substantive changes since that time. The petition cannot meet the § 66.0207(1)(a) standard.

The area proposed for incorporation (beyond the most densely populated square mile) does not have the potential for development on a substantial scale within the next 3 years. While the Board “may” waive that requirement to the extent water, terrain or geography prevents the development, it would be an abuse of discretion to do so in this case for the reasons thoroughly explained in the 1973 decision and 1977 decision. The petition cannot meet the § 66.0207(1)(b) standard.

The lack of developable area in the proposed village limits its potential sources of tax revenue and will make it difficult to fund the cost of providing an urban level of services at a local tax rate that compares favorably to other villages. This was also the conclusion reached in the 1973 decision and 1977 decision. Since that time, the Town of Campbell’s effort to construct a separate water system makes its financial wherewithal even more questionable. The petition cannot meet the § 66.0207(2)(a) standard.

The City of La Crosse Common Council has adopted a resolution on its willingness to annex the area. Annexation to the City would be the most logical and appropriate result here. The proposed village is an urban community with urban problems. The proposed village needs and already uses and relies on many services provided by the City. The City could provide a higher level of services – more services, better services, timelier services, and more efficient services – to the residents of the proposed village than the newly incorporated village would provide. Instead of this, residents of the proposed village will be asked to accept lower levels of service, including critical ones like fire protection and potable water. The residents will also be expected to pay \$30 million more for construction its own unproven and less reliable water service than by negotiating with the City to obtain City water. The City would be able to provide a higher level of service to residents in the territory proposed for incorporation than the proposed village would. This also was the conclusion reached in the 1973 decision and 1977 decision. The petition cannot meet the § 66.0207(2)(b) standard.

Finally, permitting the incorporation would substantially hinder the solution of governmental problems affecting the metropolitan community. The 1973 decision and 1977 decision included thorough discussions of this factor. In both cases, the reviewer concluded that an express finding

could not be made that the proposed incorporation would not substantially hinder the solution of governmental problems affecting the metropolitan community. The same conclusion should be reached here. The greater region faces many issues which the proposed village is either unable or unwilling to collaborate on. Another incorporated governmental body should not be created which would hinder the solution of metropolitan problems and obstruct the City's natural growth area to the west. The petition cannot meet the § 66.0207(2)(d) standard.

As recognized in *Pleasant Prairie*, 113 Wis.2d 327, 333 (1983). "It must be conceded that the very strictures placed upon incorporation in metropolitan areas makes such incorporation difficult. The characteristics that naturally evolve in areas bordering upon a major metropolitan community almost dictate facts and physical circumstances that tend to give some support to a logical conclusion that the outlying areas do not have an independent viability, but a viability that is dependent upon the adjacent metropolis." That is the case here.

When taking the entire area proposed for incorporation (as the statute requires), it is apparent that the area is not compact or homogeneous. In *Pleasant Prairie*, 113 Wis.2d 327, a town seeking to incorporate a whole town argued that the reviewer's application of this standard placed the town in a "Catch-22" because a partial incorporation could trigger other obstacles to incorporation. In rejecting this argument, the court stated:

"If this be a 'Catch-22' as the town claims, the problem stems from the fact that the statute requirement homogeneity and also required the department to consider the impact of a partial incorporation on the remainder of the town. The problem is clearly legislative in nature and reflects the fact that is apparent from a mere reading of the procedures for the incorporation of villages and cities that the legislature, not the department, has placed substantial obstacles in the path of the incorporation of a city of village which falls within the metropolitan area." (p. 899-900)

The petition fails to meet any of the five relevant Incorporation Review Board statutory standards in § 66.0207, Wis. Stats., and must be dismissed.

**CITY OF LA CROSSE REPORT  
OPPOSING THE PROPOSED INCORPORATION OF THE  
TOWN OF CAMPBELL, LA CROSSE COUNTY, WISCONSIN  
AS THE VILLAGE OF FRENCH ISLAND**

**MAP ATTACHMENT  
MAPS 1-15**

**Including:**

- Map 1:** Area 1 of Town of Campbell
- Map 2:** Area 2 of Town of Campbell
- Map 3:** Area 3 of Town of Campbell
- Map 4:** Area 4 of Town of Campbell
- Map 5:** Area 5 of Town of Campbell
- Map 6:** Area 6 of Town of Campbell
- Map 7:** Area Map
- Map 8:** Traffic Counts North of I-90
- Map 9:** Traffic Counts South of I-90
- Map 10:** Location of Campbell Businesses
- Map 11:** Location of La Crosse Schools
- Map 12:** La Crosse Fire Department Stations and Response Times
- Map 13:** La Crosse Parks and Recreation Lands
- Map 14:** La Crosse Watermains on French Island and Hiawatha Island
- Map 15:** La Crosse MTU Transit System Map



**CITY OF LA CROSSE**

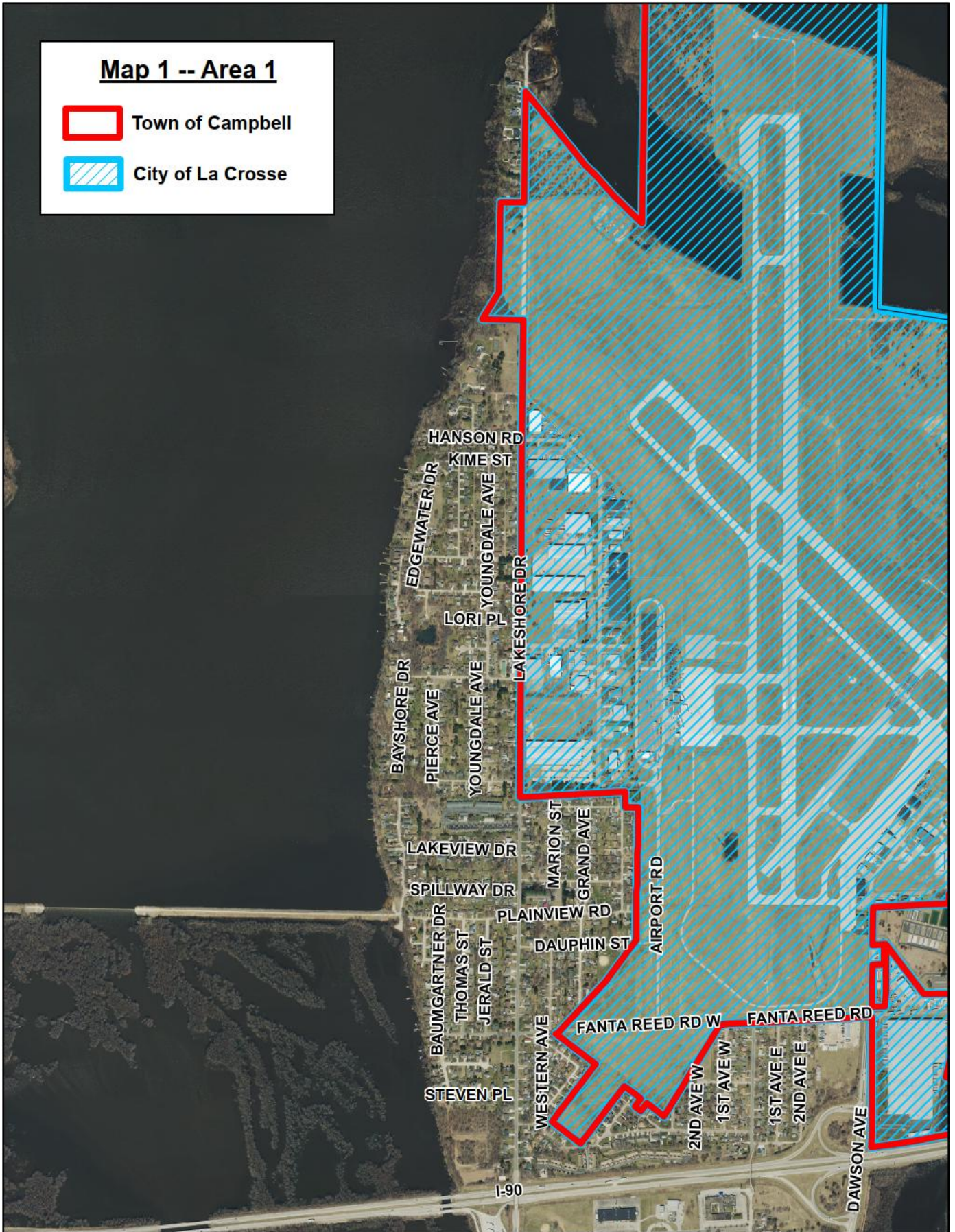
**December 1, 2025**



## Map 1 - Area 1

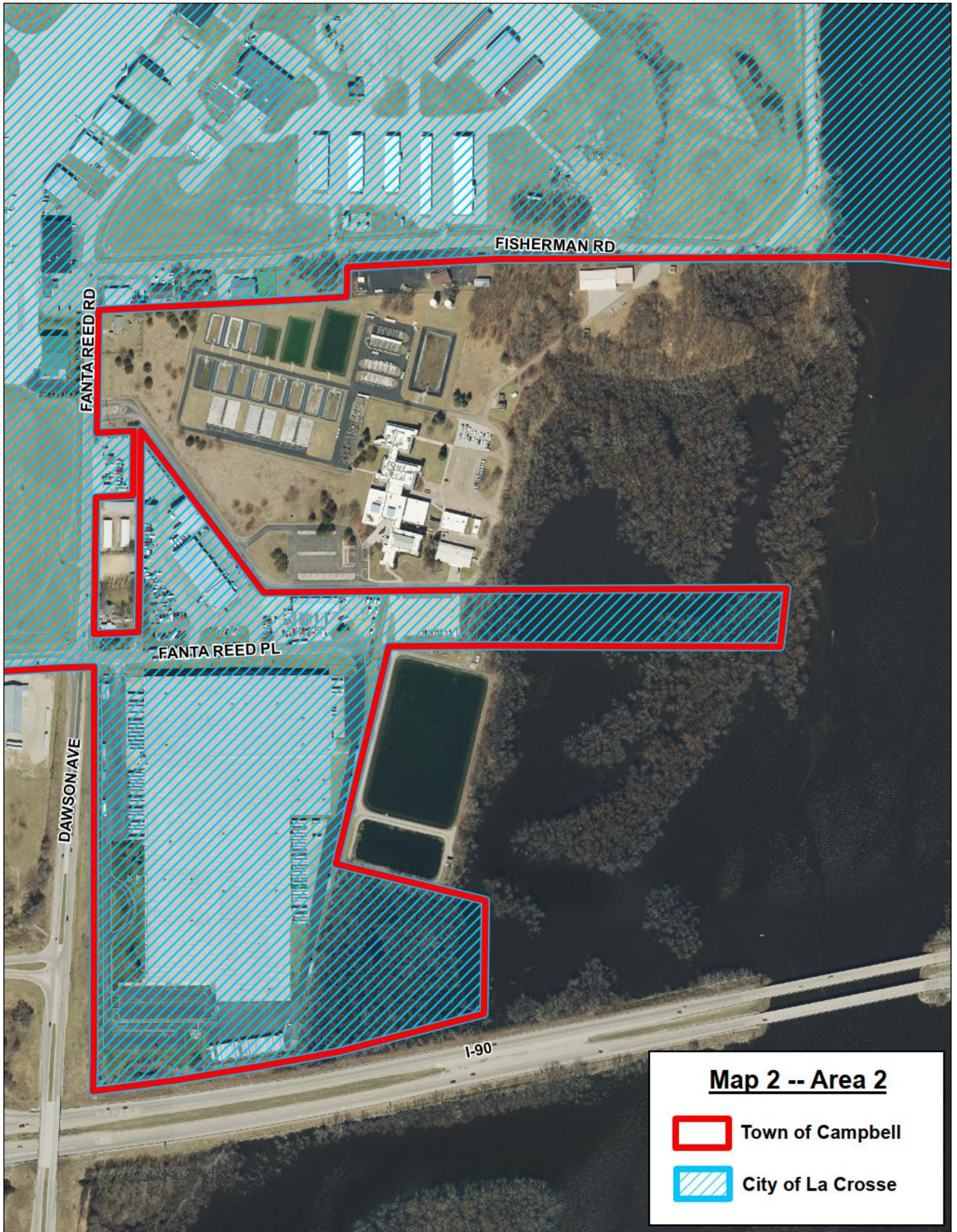
### Map 1 -- Area 1

-  Town of Campbell
-  City of La Crosse





## Map 2 - Area 2





# Map 3 - Area 3



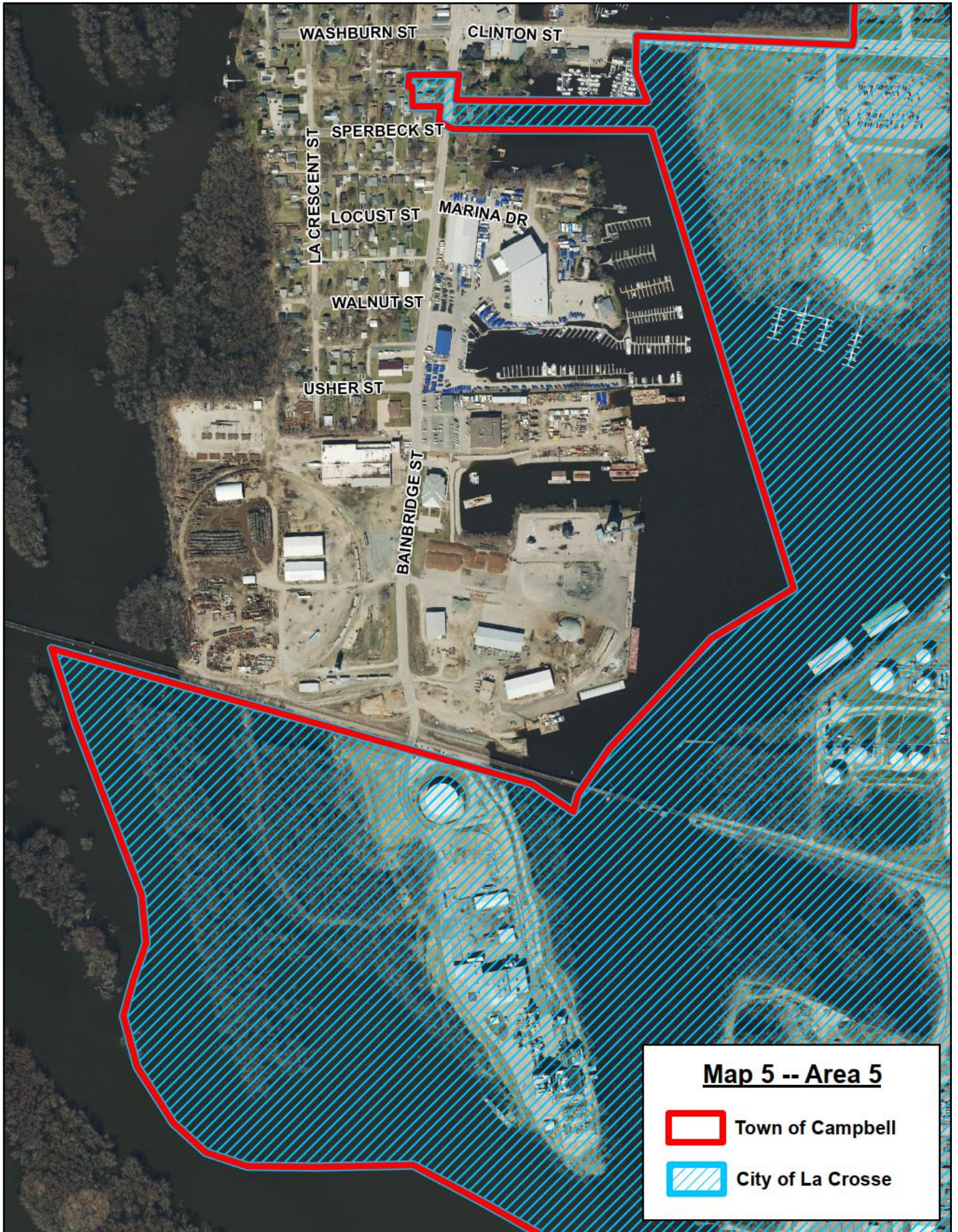


## Map 4 - Area 4



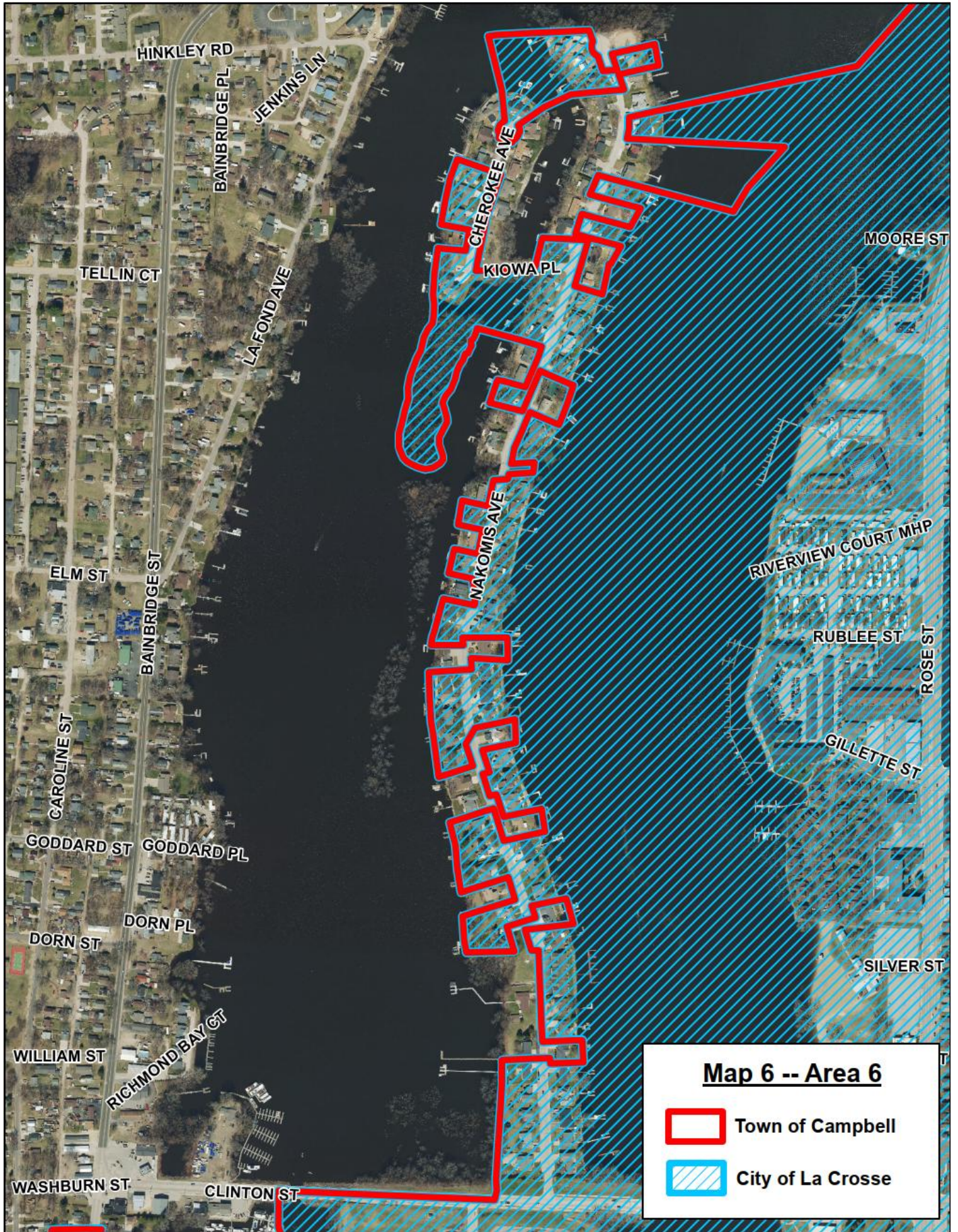


## Map 5 - Area 5



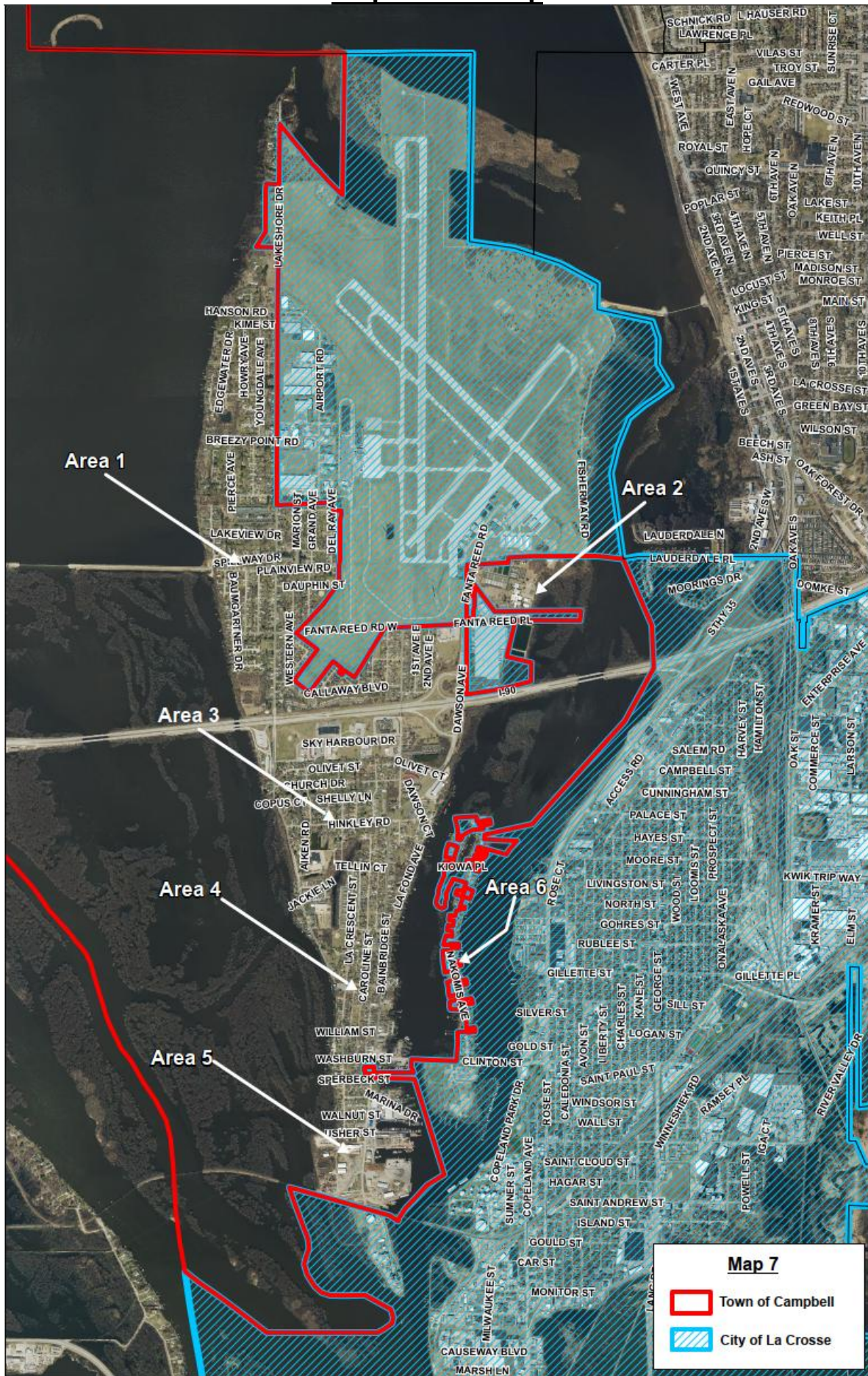


## Map 6 - Area 6



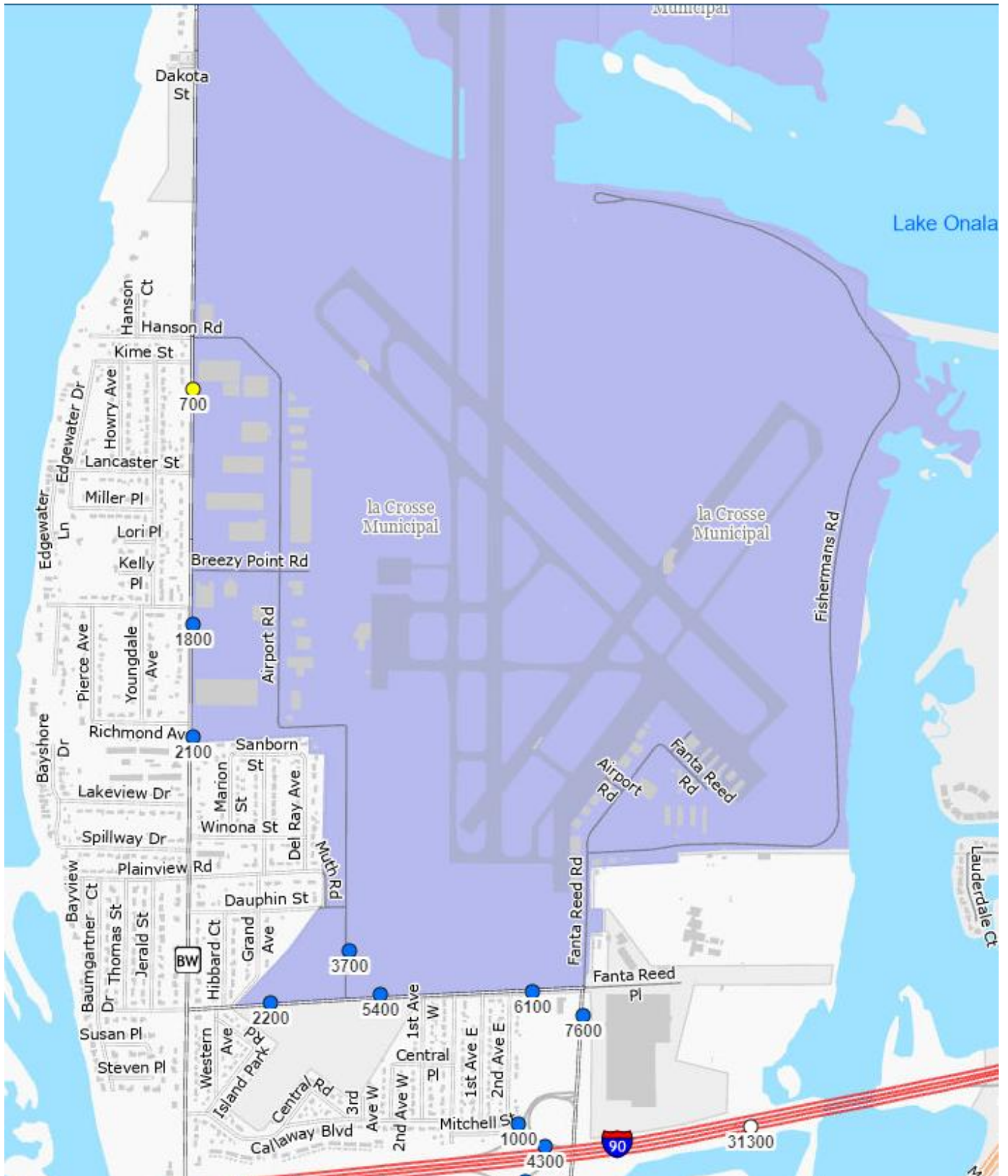


# Map 7- Area Map

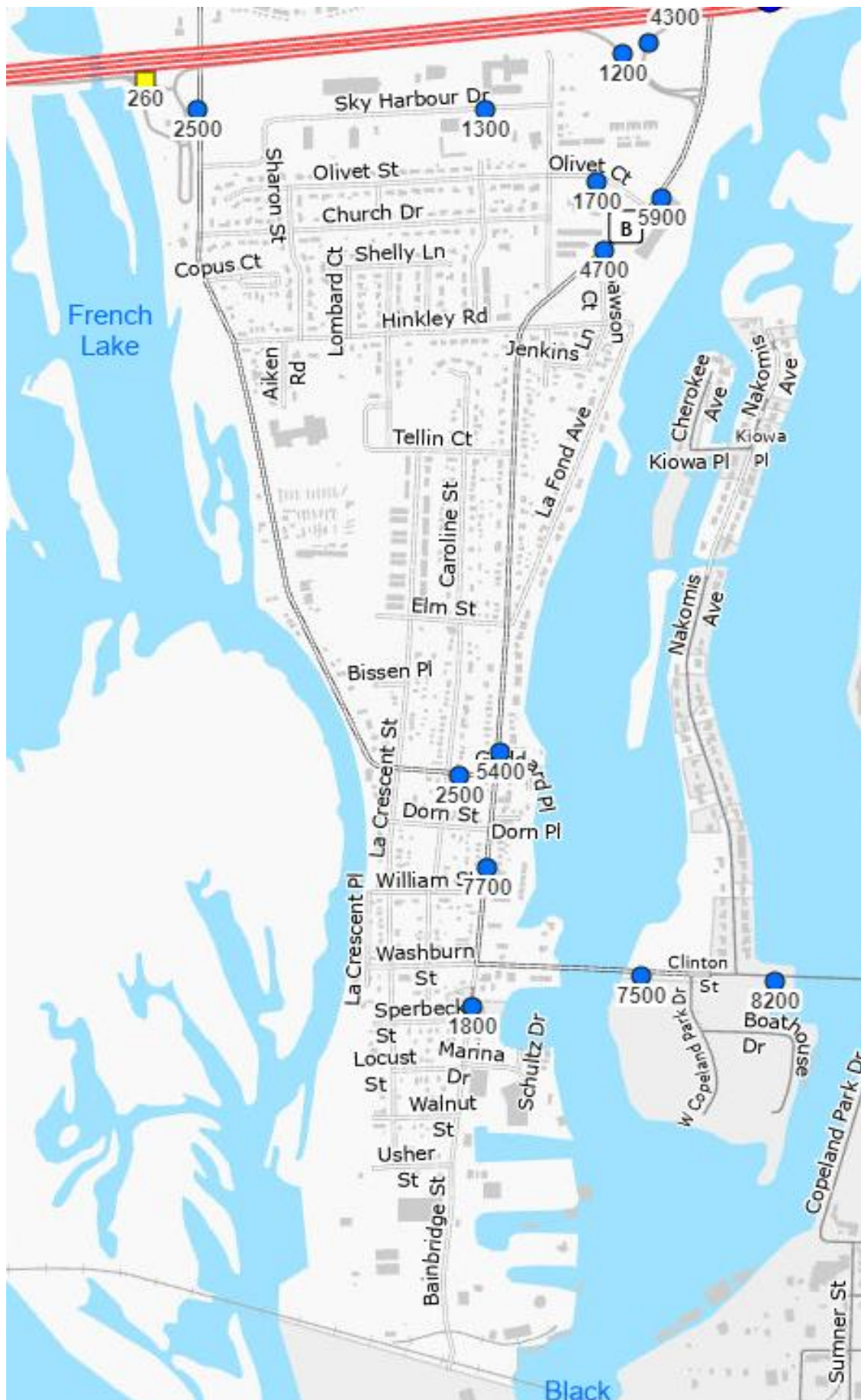




**Map 8 – Traffic Counts North of I-90**

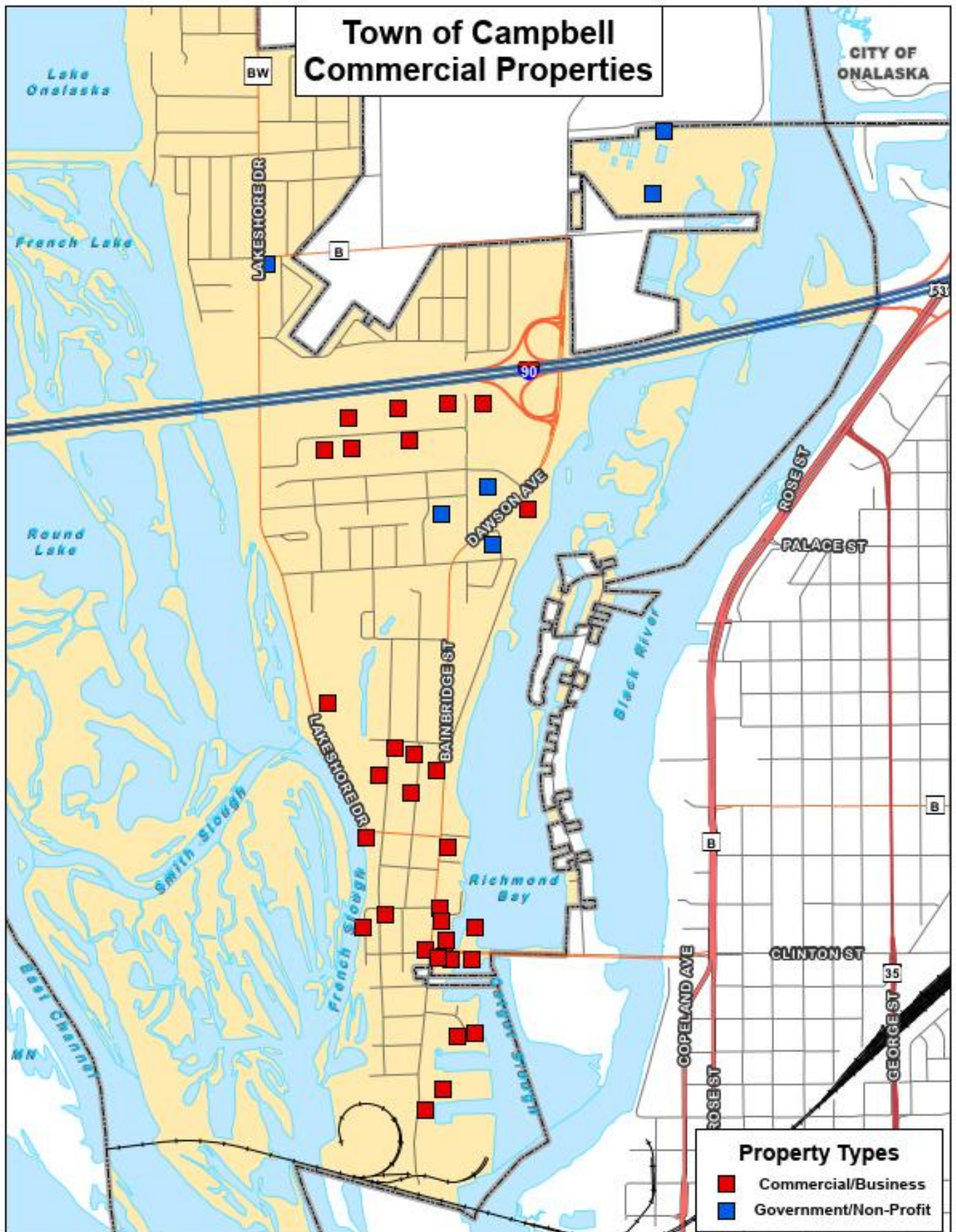


**Map 9 – Traffic Counts South of I-90**



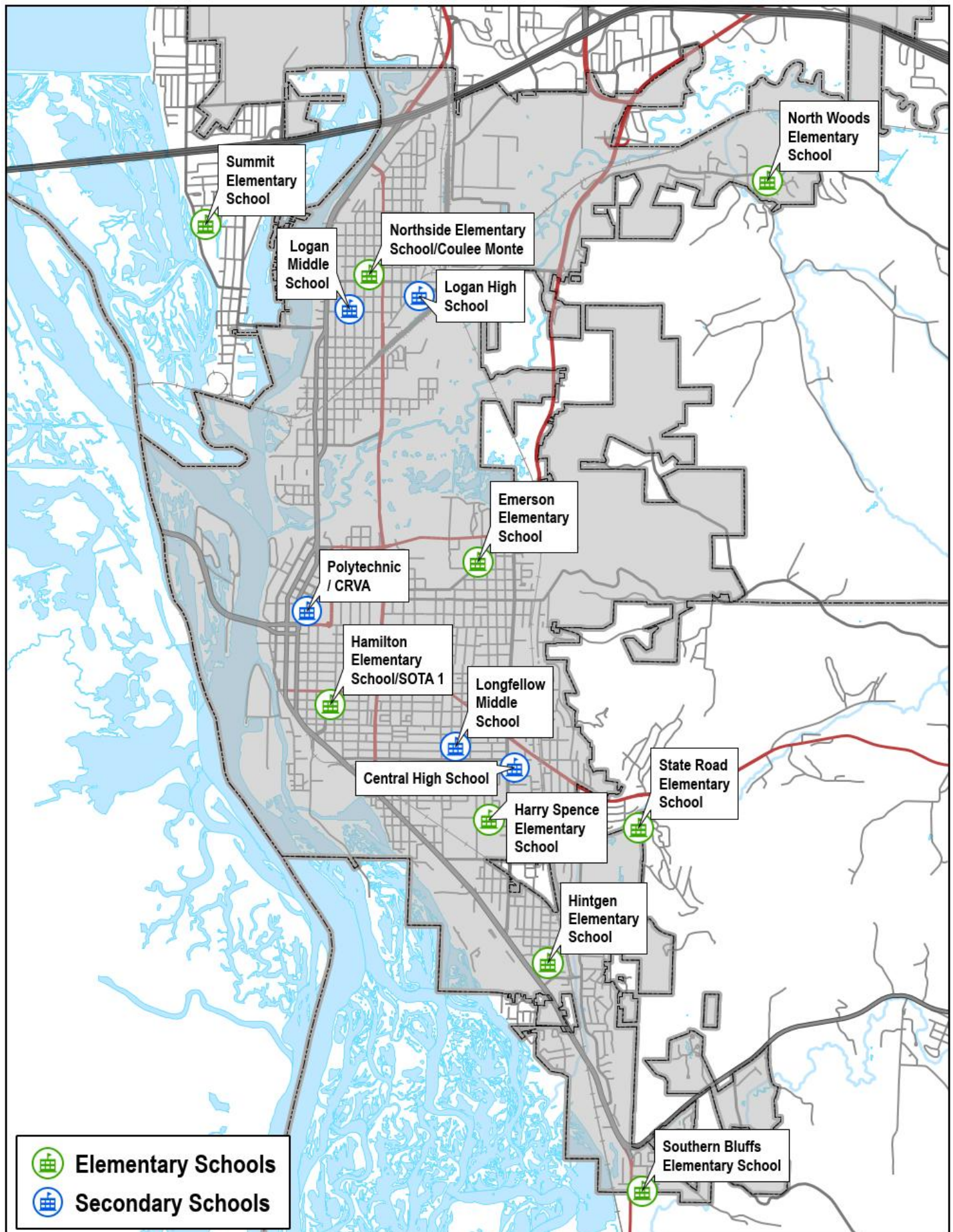


Map 10 – Location of Campbell Businesses



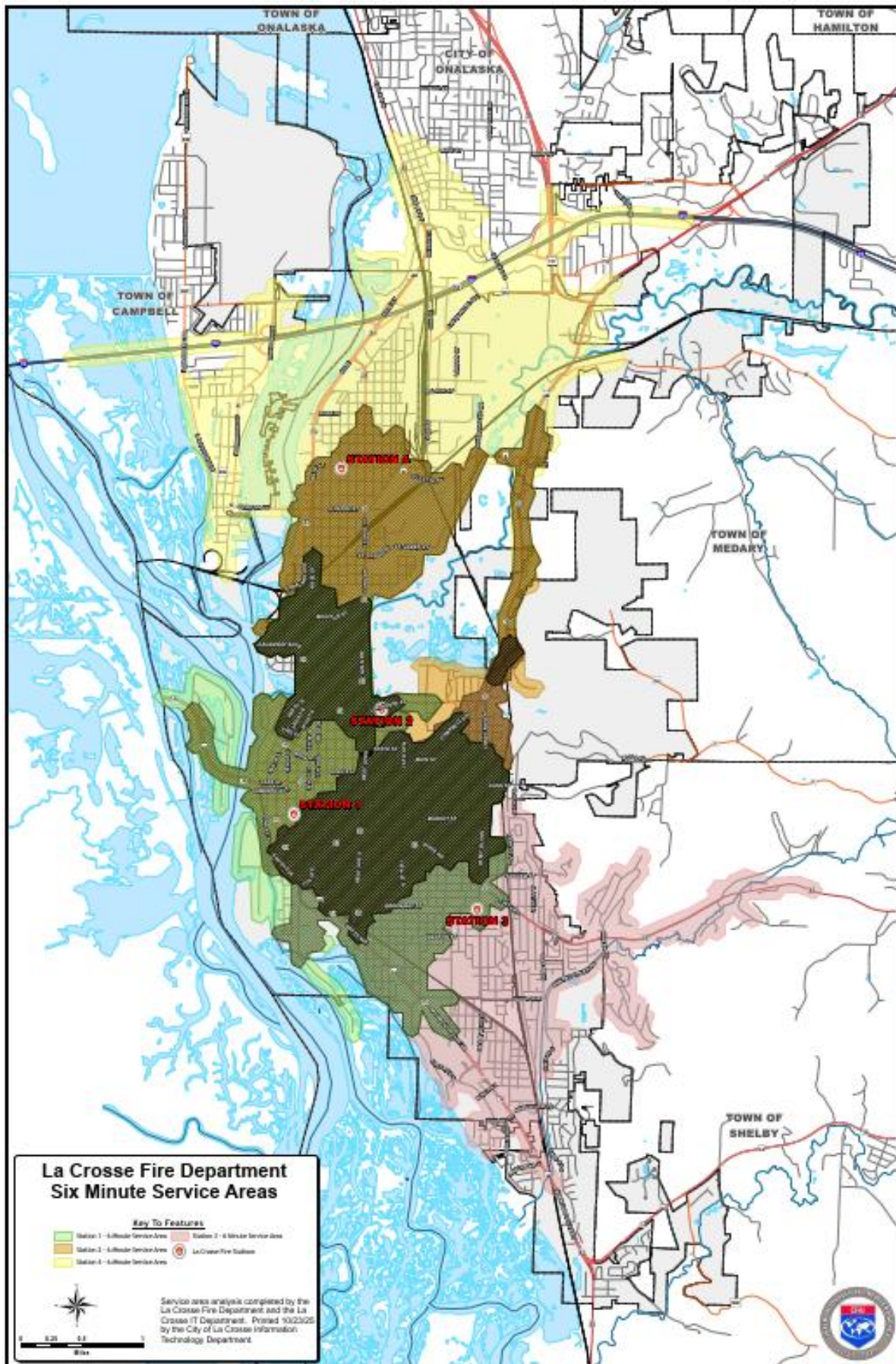


**Map 11 – Location of La Crosse Schools**





**Map 12 – La Crosse Fire Department Stations and Response Times**





**CITY OF LA CROSSE PARKS AND RECREATION**

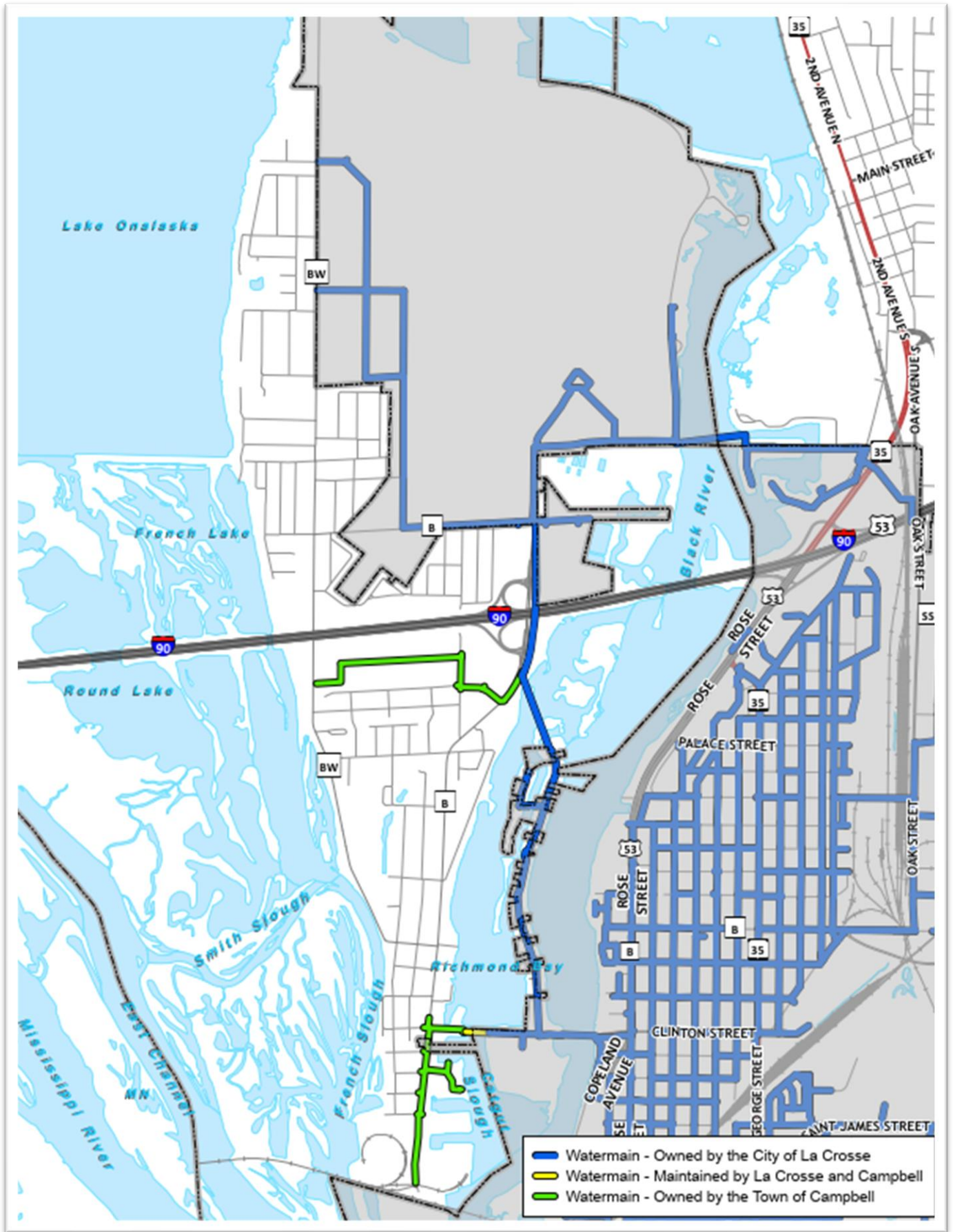
Map showing the City of La Crosse, Wisconsin, and its surrounding areas (Towns of Onalaska, Campbell, Medary, and Shelby). The map displays the Mississippi River, major roads, and numerous parks and recreation areas. A legend in the bottom right corner lists 100 parks with their names and map indices. A scale bar and north arrow are in the bottom left corner.

Park Name	Map Index
St. James Boat Landing	10
St. James Park	11
St. James Boat Landing	12
St. James Boat Landing	13
St. James Boat Landing	14
St. James Boat Landing	15
St. James Boat Landing	16
St. James Boat Landing	17
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St. James Boat Landing	98
St. James Boat Landing	99
St. James Boat Landing	100

[illegible]



**Map 14 – La Crosse Watermains on French Island and Hiawatha Island**





# Map 15 – La Crosse MTU Transit System Map

## Transit System Map

Effective August 2023



608-789-7350  
www.CityOfLaCrosse.org/MTU

### Plan your trip on Google Maps

MTU has partnered with Google to include our information on Google Maps. Google's Trip Planner is now available on the City of La Crosse website. You provide your trip origin, destination and travel time and Google Maps does the rest. The La Crosse MTU Trip Planner will provide transit options for trip origin/destination in the La Crosse MTU service area including Onalaska, La Crescent and Town of Campbells.

It's easy - from the La Crosse MTU home page at [www.cityoflacrosse.org/mtu](http://www.cityoflacrosse.org/mtu) or [maps.google.com](http://maps.google.com), simply enter the start and end address in the Trip Planner by either street address, cross streets or major landmarks along with the trip date and desired arrival or departure time - for same-day service or many weeks in advance. The Trip Planner will then display destinations and from the nearest bus stop, applicable route numbers including any transfer information, and total travel time. Riders will no longer need to sort through timetables - they simply use Google Maps.

### French Island & La Crescent Service

Route 7 and route 10 buses stop at the bus stops shown, but will also stop at any center along the route. Simply flag down the driver as the bus approaches.

Because La Crescent and French Island will also deviate from the main driver's request. To get dropped off at a location off the regular route, you must tell the driver your destination as you board the bus, so they know to deviate off the regular route to drop you off.

To request pick up from any area off the route, please call the MTU office at 789-7359 at least 10 minutes before desired pick-up time. Please be at the bus stop before scheduled pick-up time. The bus will not be able to wait.

### Clinton & Caledonia Transfer Point

Bus stop locations  
Parking lot  
To Onalaska  
To French Island  
To Onalaska

### Map Legend

- Bus Route
- Route Number
- Bus Stops: Buses stop only at these locations marked routes 1 and 10 - see side above
- Timepoint: Use these points to reference timetable. Your bus stop may be between timepoints.
- Direction of Travel: On one-way portions of routes
- Demand-Response Route: Service available upon request. See route below.
- Limited Service Route: Only certain stops take this route
- Roads: State and US Highways, Interstate Highways, Railroads
- Schools
- Points of Interest
- Parks and School Property
- Colleges and Universities

### Demand-Response

Demand-response portions of routes offer service upon request.

To get dropped off at any of these locations, you must tell the driver your destination as you board the bus, so they know to deviate off the regular route to drop you off.

To request pick up from any of these locations, you must call the MTU office at 789-7359. Please call no more than 10 minutes before desired pick-up time. Please be at the bus stop before scheduled pick-up time. The bus will not be able to wait.

### Downtown La Crosse Transit Center



The Downtown Transit Center, located at 3rd & Jay Street in the Grand River Station, has many amenities that make riding La Crosse MTU a snap.

The Transit Center includes:

- Outdoor seating area and public restrooms
- Change machine
- Customer service window that sells passes and tickets (Monday through Friday)
- Printed schedules and other important information
- Parking available at the nearby ramp
- City Center Ramp & Market Square
- Each bus route is assigned a specific bus bay so passengers always know where to catch the particular route
- Electronic signs that display when the next bus is scheduled to arrive
- No smoking
- Afternoon late entry bus service connects 24 hours to Madison and 12 hours to Menomonie, 900-461-5333 or 789-7359.

### Fares, Passes & Transfers

**Cash Fares**  
Pay your exact cash fare as you board the bus. Drivers do not make change.

Adult (age 18-64)	\$1.50
Youth (age 4-17)	\$1.25
Children (age 3 and under)	Free
Seniors (age 65 and up)*	.75
Disabled Persons*	.75

\*10 card issued by MTU or Medicare card required.  
Try our Mobile Pay App for more fare options.

**Monthly Passes**  
Valid for selected trips for the month shown.

Adult (age 18 and up)	\$35.00
Youth (age 4-17)	\$23.00
Monthly	\$45.00
Freedom (June, July, August)	\$30.00
Seniors (age 65 and up)*	\$25.00
Disabled Persons*	\$25.00

\*10 card issued by MTU or Medicare card required.

**Tokens**  
One token is valid for one adult or youth cash fare.

Adult tokens	10 for \$14.50
Youth tokens	10 for \$12.00

Tokens may be purchased at the MTU office or the Transit Center.

**Transfers - Free**  
Transfers are issued on all routes upon request at time fare is paid, which enables passenger to transfer to any other route operating in different directions. These transfers are valid only when presented by the passenger to whom issued on the next connecting bus at designated transfer point.

### Monthly Pass Outlets

- Downtown Transit Center - Grand River Station
- La Crosse City Hall - Lobby/Window 1 & 2
- UWL - Student Union
- Gardeners Pharmacy - Village Federal Store or Center 96 in Onalaska
- Peoples Food Group
- La Crescent Area Hardware

### UWL, WTC & Viterbo Students

You've got a ticket to ride!  
Valid student IDs from either UWL, WTC or Viterbo will serve as a pre-paid bus pass. Persons showing a valid student ID from any of these institutions are entitled to reduced rates throughout the year.



All routes, fares and schedules are subject to change.



**CITY OF LA CROSSE REPORT  
OPPOSING THE PROPOSED INCORPORATION OF THE  
TOWN OF CAMPBELL, LA CROSSE COUNTY, WISCONSIN  
AS THE VILLAGE OF FRENCH ISLAND**

**ATTACHMENTS 1-9**

**Including:**

- Attachment 1:** 1973 decision dismissing petition – In the matter of the Proposed Incorporation of the Village of French Island, La Crosse County
- Attachment 2:** 1977 decision dismissing petition – In the matter of the Proposed Incorporation of the Village of French Island, La Crosse County
- Attachment 3:** Annexations from the Town of Campbell to the City of La Crosse
- Attachment 4:** Town of Campbell 2026 Budget
- Attachment 5:** PSC Incompleteness Determination
- Attachment 6:** Trilogy Consulting, LLC Report
- Attachment 7:** Donahue & Associates, Inc. Report
- Attachment 8:** Wisconsin Policy Forum Report – Something in Common
- Attachment 9:** Correspondence between City and Town

**CITY OF LA CROSSE**

**December 1, 2025**

## **Attachment 1**

### **1973 decision dismissing petition – In the matter of the Proposed Incorporation of the Village of French Island, La Crosse County**

Inserted on subsequent page(s).



In the Matter of the Proposed :  
Incorporation of the Village of:  
French Island, LaCrosse County :

DETERMINATION OF THE  
PLANNING DIRECTOR

On December 27, 1972 there was received at the office of the Director of the Bureau of Local and Regional Planning and Head of the Planning Function of the Department of Local Affairs and Development, State of Wisconsin, in accordance with the provisions of s. 66.014 (8), Wisconsin Statutes, a record relating to a proceeding in the Circuit Court for LaCrosse County to incorporate a village to be known as the Village of French Island, located in the Town of Campbell, LaCrosse County, to-wit:

Commencing in the NE $\frac{1}{4}$  of Section 11, Township 104 North, Range 4 West of the 5th principal Meridian, at the point of intersection of the center line of the West Channel of the Mississippi River with the center line of the main East Channel of said river, being a point in the Western boundary of the State of Wisconsin, running thence Southeasterly along the center line of the East or Main Channel of said river to its intersection with the extended South line of Section 30, T 16 N, R 7 W, Thence East along said Section Line and the extension thereof to the center of the Main Channel of the Black River.

Thence Northerly along the center of the Main Channel of the Black River to its intersection with the center of Joe Lynn Slough.

Thence Westerly along the center of Joe Lynn Slough to its intersection with the center of French Slough. Thence Northerly along the center of French Slough to the Southerly right-of-way line of the Chicago, Milwaukee, St. Paul and Pacific Railway. Thence Southeasterly along the Southerly line of said railroad right-of-way and along the extension thereof to the center of the Main Channel of the Black River. Thence Northeasterly along the center of the Main Channel of the Black River to its intersection with the center line of Coleman Slough (Cat-Gut Slough). Run thence Northeasterly along the center line of Coleman Slough to the South right-of-way line of Clinton Street being an extension of the public highway formerly known as Washburns Street according to the recorded Plat of West LaCrosse. Thence East along the South line of Clinton Street to the center line of the Main Channel of the Black River.

Thence Northerly along the center line of the Main Channel of the Black River to the North line of Section 17, T 16 N, R 7 W. Thence West along the North line of said Section 17 and the North line of Section 18, Township and Range aforesaid, to a point 500 feet West of the East line of Section 18. Thence South and parallel to the East line of Section 18, 101.50 feet.

Thence West and parallel to the North line of Section 18 to the East 1/16th line of Section 18, running thence South on the East 1/16th line of Section 18 to the North 1/16th line of Section 18, running thence West on the North 1/16th line of Section 18 to a point 949.12 feet East of the West 1/16th line of said Section 18.

Thence S 30° 38' W 1,190.15 feet.

Thence N 53° 39' W 419.86 feet to the West 1/16th line of said Section 18.

Thence continuing N 53° 39' W 130.14 feet.

Thence S 36° 21' W 800.00 feet.

Thence N 53° 39' W 400.00 feet.

Thence N 36° 21' E 800.00 feet.

Thence N 53° 39' W 550.00 feet.

Thence N 42° 04' E 7.71 feet to the North 1/16th line of said Section 18.

Thence continuing N 42° 04' E 795.67 feet.

Thence N 35° 27' E 561.39 feet to the West 1/16th line of said Section 18 at a point 983.20 feet North of the North 1/16th line of said Section 18.

Running thence North on the West 1/16th line of Section 18 and Section 7, T 16 N, R 7 W, to the South 1/16th line of Section 7.

Running thence West on the South 1/16th line of Section 7 to the West line of Section 7.

Running thence North on the West line of Section 7 and Section 6, T 16 N, R 7 W, to a point on the West line of Section 6, 1,135.00 feet North of the West Quarter Post of Section 6.

Running thence S42°00'E794.10 feet.

Running thence S42°01'E369.90 feet.

Running thence S42°17'E273.80 feet to a point on the East and West  $\frac{1}{4}$  line of Section 6, 960.00 feet East of the West line of Section 6.

Running thence S46°16'E455.30 feet to a point on the West 1/16th line of Section 6, 982.00 feet North of the South 1/16th line of Section 6. Thence North along said West 1/16th line of Section 6 to the North line of Section 6. Thence West along the North line of Section 6, and along the North line of Section 1, T 16 N, R 8 W, to the Northwest corner of Section 1.

Thence North along the East line of Section 35, T 17 N, R 8 W, to the Northeast corner thereof. Thence West along the North line of said Section 35, and along the North line of Sections 34 and 33, T 17 N, R 8 W and extension thereof to the center line of the Main Channel of the Mississippi River, being the Western boundary of the State of Wisconsin. Thence Southerly, downstream along the center of the Main Channel of the Mississippi River to the place of beginning, and contains 7,980 acres, more or less.

Upon receiving said petition the Director proceeded to make an investigation in accord with the provisions of section 66.014 (9) (a), necessary to enable him to apply the standards of section 66.016, and to make the determination required of him by section 66.014 (9) (e). The determination required of the Director is one of the following:

1. The petition as submitted shall be dismissed;
2. The petition as submitted shall be granted and an incorporation referendum held;
3. The petition as submitted shall be dismissed with a recommendation that a new petition be submitted to include more or less territory as specified in the Director's findings and determination.

The standards to be applied by the Director in making said determination are as follows:

66.016 Standards to be applied by the Director. (1) The Director may approve for referendum only those proposed incorporations which meet the following requirements:

(a) Characteristics of territory. The entire territory of the proposed village or city shall be reasonably homogeneous and compact, taking into consideration natural boundaries, natural drainage basin, soil conditions, present and potential transportation facilities, previous political boundaries, boundaries of school districts, shopping and social customs. An isolated municipality shall have a reasonably developed community center, including some or all of such features as retail stores, churches, post office, telephone exchange and similar centers of community activity.

(b) Territory beyond the core. The territory beyond the most densely populated one-half square mile specified in s. 66.015 shall have an average of more than 30 housing units per quarter section or an assessed value, as defined in s. 66.021 (1) (b) for real estate tax purposes, more than 25 percent of which is attributable to existing or potential mercantile, manufacturing or public utility uses. The territory beyond the most densely populated square mile as specified in s. 66.015 (3) or (4) shall have the potential for residential or other urban land use development on a substantial scale within the next three years. The Head of the Planning Function may waive these requirements to the extent that water, terrain or geography prevents such development.

(2) In addition to complying with each of the applicable standards set forth in sub. (1) and s. 66.015, any proposed incorporation in order to be approved for referendum must be in the public interest as determined by the Director upon consideration of the following:

(a) Tax revenue. The present and potential sources of tax revenue appear sufficient to defray the anticipated cost of governmental services at a local tax rate which compares favorably with the tax rate in a similar area for the same level of services.

(b) Level of services. The level of governmental services desired or needed by the residents of the territory compared to the level of services offered by the proposed village or city and the level available from a contiguous municipality which files a certified copy of a resolution as provided in s. 66.014 (6).

(c) Impact on the remainder of the town. The impact, financial and otherwise, upon the remainder of the town from which the territory is to be incorporated.

(d) Impact on the metropolitan community. The effect upon the future rendering of governmental services both inside the territory proposed for incorporation and elsewhere within the metropolitan community. There shall be an express finding that the proposed incorporation will not substantially hinder the solution of governmental problems affecting the metropolitan community.

On December 29, 1972 in compliance with s. 66.014 (9) (b) there was received at the office of the Head of the Planning Function a request for a public hearing on the matter of the proposed incorporation from Mr. William J. Sauer, Assistant City Attorney, City of LaCrosse. Accordingly, after receipt of the petition from the Circuit Court, notices were sent and published pursuant to the requirements of s. 66.014 (9) (c).

On February 20, 1973 said hearing was held in the Auditorium at the County Courthouse, within the territory, before George A. James, Acting Director of the Bureau of Local and Regional Planning and the Head of the Planning Function. The petitioners for incorporation were represented at this hearing by the legal counsel, Steele, Smyth, Klos & Flynn. Numerous regional and local officials and citizens were present at the hearing, and all present were given an opportunity to be heard. At this hearing testimony bearing on the proposed incorporation was heard, various documents and other exhibits were introduced for the Director's consideration, and other related information was brought forward. Additional information was subsequently provided after the hearing, under joint agreement of all concerned, by the parties there represented.

The Director has caused an investigation to be made of the information obtained at and after the hearing, from the parties there represented, from the LaCrosse Area Planning Agency, from various state agencies, and from maps, records, files, statistics, photographs and related materials of the Bureau of Local and Regional Planning.

Based on the above data, the following findings and determinations are made:

1. (a) Characteristics of the Territory.

The territory proposed for incorporation is a cluster of islands in the Mississippi River bounded on the west by the main channel of the river and the State of Minnesota, on the east and south by the City of LaCrosse, and on the north by Lake Onalaska, a flowage of the Mississippi River. It includes the entire Town of Campbell, an area of 12.4 square miles, of which 2.1 square miles are dry and habitable. The majority of the town lies within the Mississippi River Floodway, and significant portions of the remainder lie in the floodplain adjoining the floodway.

The land is low lying and level to gently rolling in nature. The soils in the floodway portion of the town are poorly drained alluvial soils and river wash, elsewhere they are sandy soils of the Dakota, Plainfield, Meridian and Sparta varieties, which have few limitations for urban development. Septic tanks on these latter soils may pollute the groundwater, however, due to very rapid percolation rates.

Of the total area of 8,522 acres, 5,198 acres (61 percent) are water surface and 2,117 acres (25 percent) were vacant (including agriculture and forest) in 1967 (see Table 1).

Of the 2,117 acres classified as vacant land, the General Plan reported only 135 acres as suitable for development. This figure appears low. The city planning department reported 274 acres in agriculture and woodlands and 733 acres vacant (including streets)

in 1972. The area has 23.2 miles of standard roads and 2.97 miles of Interstate. Subtracting this area (calculated to be 311.6 acres) we arrive at a figure of 695.4 acres of land available for development. From the standpoint of physical constraints, over 80 percent of the territory is unsuited for any sort of urban development in its present condition and, for flood control reasons, must remain so.

Table 1

Town of Campbell Existing Land Use, 1967

<u>Land Use</u>	<u>Area (acres)</u>	<u>% of Total</u>	<u>% of Developed Area</u>
Residential	297	3	25
Manufacturing and Wholesale	21	0**	2
Commercial	11	0**	1
Public and Semi-Public	17	0**	1
Transportation and Utilities	854	10	70
Parks and Recreation	<u>8</u>	<u>0**</u>	<u>1</u>
Total Developed	1,204	14	100
Vacant*	2,117	25	
Water Area	<u>5,198</u>	<u>61</u>	
Total Area	8,522	100	

\* Includes agriculture and woodlands.

\*\* Percentages less than one-half of one percent shown as 0.

Source: Background Report, LaCrosse Area General Plan, Candeub, Fleissig & Associates, 1968.

Taking the entire territory into consideration, it cannot be deemed to be either compact or homogeneous in physical terms.

French Island has been settled since the late 1700's, but was largely ignored until the 1950's as a suburban residential area. At that time, the southern part of the island appeared to be a depressed, rural slum subject to periodic flooding and plagued with poor sanitary conditions and substandard housing. The northern part of the island was primarily farmland. Subsequent to 1950, the area was subject to increasing development pressure and the new residents soon became involved in a campaign to improve conditions on the island and assume control of the local government. As time passed and the ranks of the new suburbanites grew, the campaign was successful. Many of the changes that were sought have been achieved, yet there remains a substantial number of the older residents and a legacy of low quality development in the southern part of the island which are quite different from the new developments on the central and northern parts of the island.<sup>1</sup>

The population of the territory was reported as 3,327 in the 1970 Census, and estimated to be 3,723 in 1972 by the city planning department. With a developable area of 1,339 acres or 2.1 square miles, this yields a gross population density of 1,773 persons per square mile. The city planning department also estimated a residential land use area of 321 acres in 1972, which would result in a net residential density of 11.6 persons per acre. Recent population growth has been rapid. The population rose from 2,296 in 1960 to 3,327 in 1970, an increase of 45 percent in ten years. The population is projected to increase to between 3,890 and 4,500 by 1980, an increase of 17 to 35 percent. 1990 projections range from 5,620 to 6,450 for a total increase of from 69 to 94 percent. Such growth rates are typical of suburban areas close to major cities.

The developable portion of the territory amounted to 1,339 acres in 1967 and was extensively (50 percent) developed, but at relatively low density. The residential density at that time according to the General Plan Background Report was only three dwelling units per net acre, a density characteristic of suburban areas. From 1968 through 1972, 319 residential building permits were issued and seven nonresidential (industrial, commercial, etc.) permits were issued (see Table 2). During the same

<sup>1</sup>The above material is based on FRENCH ISLAND: Modern Magic in the Suburbs, Francour, Al and Wileden, A. F., Department of Rural Sociology, College of Agriculture, University of Wisconsin, Madison, Wisconsin. #1 Community Services, December 1961.

period, an undetermined but relatively small number of substandard dwellings were condemned and demolished, yielding a slightly lower net increase in the number of dwellings. The town officials reported that there were 1,168 dwellings in the area in 1972. With 321 acres of net residential land, this would produce a net density of 3.6 dwellings per acre, still low by comparison with that of the City of LaCrosse.

Table 2

Town of Campbell Building Permits Summary 1968-1972

<u>Year</u>	<u>Residential</u>	<u>Commercial</u>	<u>Industrial</u>	<u>Other</u>	<u>Total</u>	<u>Value</u>
1968	77	1	1	0	79	\$1,386,307
1969	41	0	0	1	42	573,865
1970	62	1	0	0	63	754,304
1971	74	0	0	0	74	910,070
1972	<u>65</u>	<u>2</u>	<u>0</u>	<u>1</u>	<u>68</u>	<u>2,783,400</u>
Total	319	4	1	2	326	\$6,407,946

Source: Petitioners for Incorporation, Exhibit #1D, Certified Summary of Building Permit Data submitted by the County Zoning Administrator.

Access to the territory is quite limited, as there are only two connecting points to the mainland. One is an interchange on Interstate Highway 90, the other is County Trunk B, which connects with Clinton Street in the City of LaCrosse, city bus service is not available in the territory. Access to intercity bus and rail transportation is relatively convenient to the area in the City of LaCrosse. Air transportation is provided by the City of LaCrosse airport on the island. River port facilities are found in both the town and the City of LaCrosse.

The territory contains both commercial and industrial land uses, but these fall far short of meeting the needs of the residents for goods, services and employment. Of the 46 businesses listed by the petitioners, there were only two grocery stores, a laundry/dry cleaning plant, a gasoline station, a laundromat, a beauty salon, and six bars providing convenience goods and services to the residents of the territory. For all other convenience goods and services the residents are dependent upon the City of LaCrosse. It is recognized that many of the shopping and other facilities now lacking will be available in the future when the shopping center is fully developed, but this facility is still in the proposal stage at present. The employment figures estimated for these businesses range from about 215 (by petitioners) to 256 (Wisconsin State Employment Service). The labor force resident in the area is much larger. Exact labor force figures were not available, but the General Plan report listed 1,353 persons in the 20-64 age group in 1965. The labor force would include more than half of that amount and has no doubt increased in the seven years which have passed since then. Thus we find that less than one-third of the labor force could be employed within the territory with the rest being dependent upon the rest of the LaCrosse area for employment.

The territory is part of the LaCrosse school district and the proposed incorporation would have no affect on the operation of the school system.

The Town of Campbell has participated for many years in comprehensive planning activities to help manage its growth. It is a member of the LaCrosse Area Planning Committee and is covered by the LaCrosse Area General Plan. It also lies within the Mississippi River Regional Planning Commission and is eligible to receive professional planning services from that agency.

There appears to be some degree of social and economic cohesion within the territory according to a survey prepared by James A. Anderson, Ph.D., for the petitioners.<sup>2</sup> In a sample of 150 households in the area, Dr. Anderson reported that responses to his telephone survey showed more similarities to patterns usually associated with small rural communities than to patterns associated with newly developed suburban clusters of similar size. Dr. Anderson's time and resources for the study were apparently quite limited, for he examined the internal relationships in Campbell but did not include any questions concerning the relationships and activity patterns between Campbell and the rest of the LaCrosse area. Social and economic linkages between Campbell and LaCrosse are clearly present for most of the labor force works in LaCrosse, most of

<sup>2</sup> Anderson, James A., A Survey of the Town of Campbell, Unpublished, 1973.



the shopping is done in LaCrosse, and many residents go to church in LaCrosse. The response pattern reported by Dr. Anderson might also be that which would be found in an old, well established neighborhood in a central city. Based on the above data, it is found that the territory is not physically compact or homogeneous and that from the standpoint of shopping and social customs the territory has a measure of identity but is an integral part of the entire urban area.

(b) Territory Beyond the Core.

Section 66.016 (1)(b) requires that the territory beyond the most densely populated square mile shall have the potential for urban type development on a substantial scale within the next three years. The petitioners have designated the area bounded on the north by the LaCrosse city limits and Rochelle Road, on the east by Coleman Slough, on the west by French Slough, and on the south by Elm Street and the east-west extensions thereof as the core square mile. This area in fact contains much of the remaining undeveloped and developable land in the territory. It has already been noted that the majority of the land in the territory is not suitable for development of any sort and that undeveloped land suitable for development is becoming scarce in the territory. Of the 695 acres estimated to be vacant and developable as of 1972, 109 acres are committed to the federal-state Fish Laboratory facility and 45 acres are committed to the Ramada Inn and shopping center complex being developed between Bainbridge Street and County Trunk Highway BW on the south side of the freeway. Much of the remaining 541 acres is in the form of scattered vacant lots in the existing subdivisions. It must be concluded that most of the projected population growth of the area will result from infilling of existing developed areas and from redevelopment of existing substandard areas.

It should be noted also that 66.015 requires a minimum area of four square miles for an incorporation within five miles of a Class 2 city, which is the situation in this present case. The territory does, in fact, meet the four square mile criterion as previously determined by the Court. The law does not, however, state whether or not the proposed incorporation shall contain at least four square miles of land reasonably suited for development. The Head of the Planning Function is authorized to waive the requirements of 66.016 (1)(b) to the extent that water, terrain or geography prevents rural development. At least 80 percent of the territory is not suitable for development as a result of the above-mentioned factors and the minimum requirements of 66.015 (5) cannot be satisfied without including such unusable land amounting to nearly 50 percent of the minimum area of four square miles. The minimum standards outlined in the statute appears to be reasonable and some deviation from these would appear to be also reasonable for reasons of geography, terrain and water. However, it would be an abuse of discretion to waive the requirements of s. 66.016 (1)(b) for over 80 percent of the total area to be incorporated. If the petition were to be resubmitted with the area reduced to minimum size (four square miles), the area would still contain 1.8 square miles or more of unusable land, or nearly 50 percent of the total area. Waiving the development requirement to this extent would amount to circumventing the law rather than implementing it.

From the standpoint of good planning practices, land having the characteristics of the undevelopable land in this case (water surface, marsh, floodplain and floodway area) ought to be left in its natural state and reserved for wildlife habitat and recreation uses. Such land requires no urban services whatsoever and in such large tracts as exist in this case should remain under a rural form of government.

The minimum area of four square miles in a metropolitan area is not imposed without reason. There is a minimum size for a metropolitan community below which it is quite unlikely to be financially able to provide the type and level of services ultimately demanded by its residents. Also, there may be few or no opportunities for the community to grow by means of annexation, so that it may well remain forever the same size at which it was incorporated. This is the case with the present proposal. Thus the larger area is required for a metropolitan area incorporation to ensure that it will have adequate area and potential tax base to perform and to support the necessary urban services at a tax rate comparable to that of other municipalities in the area.

It is concluded that, despite the prospect of substantial development in a small part of the territory, most of the territory beyond the core does not have potential for substantial urban type development within three years.

2. (a) Tax Revenue.

Statutory requirements state that an analysis must be made of the potential tax and financial bases of the area proposed for incorporation to determine whether or not the proposed village will have enough financial resources available to it to properly

provide its inhabitants with a given level of services and facilities at a tax rate which compares favorably with the tax rate in a similar area for the same level of services.

The Town of Campbell presently provides the following services:

- Road maintenance and improvement
- Garbage collection and disposal
- Snow and ice removal
- Street and playground lighting
- Dog control officer
- Health officer--part-time
- Weed and brush cutting
- Parks and playgrounds
- Police protection--part-time
- Mosquito spraying
- Fire protection--volunteer department
- Sanitary sewer service to part of town

The petitioners propose to continue these services basically unchanged and their proposed budget is only slightly higher than that reported for the town for the year ending March 31, 1973. Since the territory proposed for incorporation is the entire Town of Campbell, and since a village would receive substantially higher road aids from the state, the ability of the proposed village to finance its intended operations is assured.

It should be noted also that the Town of Campbell has not levied any local taxes for some years, and the full value tax rate in Campbell is nearly nine mills lower than the full value tax rate in the Village of West Salem in LaCrosse County (see Table 3). If the village were to levy a local tax equivalent to nine mills on the full value of the land, it could raise an additional \$173,000, which is more than the proposed budget for the village.

Table 3

Full Value Tax Rate, LaCrosse Area, 1972

	<u>Total Mill Rate</u>	<u>Percent of Evaluation</u>	<u>Full Value Rate</u>
<u>Towns</u>			
Campbell	113.00	21.41*	.02419
Shelby	22.58	No Entry Reported	
Onalaska	Hol: 36.524	75.66	.02712
	Ona: 31.584		.02387
Medary	LaC: 23.5198	75.03	.017646
	W.S.: 32.8208		.024625
	Ona: 30.01311		.022518
<u>Village</u>			
West Salem	36.00	90.86	.032709
<u>Cities</u>			
Onalaska	38.00	79.94	.030377
LaCrosse	62.609	45.90	.028737

\* Figured as follows:

<u>413,681.91</u>	<u>Tax levy</u>	= 21.41
19,315,600.00	Aggregate	
	Recommended	
	Full Value	

Source: Petitioners for incorporation.

The City of LaCrosse has expressed willingness to annex the area, which requires a comparison of services. This will be done in the following section. Of interest at this point is the cost to the town of providing comparable services to those in the city. The city has estimated the capital improvement costs at over \$3.6 million and

annual operating costs of \$389,000 to provide services equivalent to those available in the city (see Table 4). The five percent debt limit of the proposed village is \$965,780 (see Table 5), far short of the amount required for the improvements. As already noted, an additional \$173,000 could be levied in local taxes but this too is short of the operating costs mentioned.

It is thus concluded that the proposed village would be able to finance its basic government operations and a variety of services included but not limited to the services presently provided by the town, but that it could not provide services equal to those offered in the City of LaCrosse.

(b) Level of Services.

Statutory requirements state that the level of services desired or needed by the residents of the territory must be compared to the level of services offered by the proposed village and the level available from a contiguous municipality which has offered by resolution to annex the area.

The services proposed by the village are as follows:

- Police protection--1 full-time; 3 part-time
- Fire protection--volunteer department, class nine urban or three rural fire insurance rating
- Parks and recreation--part-time staff
- Road improvement and maintenance
- Snow and ice removal
- Street lighting and signing
- Weed and brush removal
- Refuse collection and disposal
- Sanitary sewer--part of town is served
- Flood control participation
- Village nurse--part-time
- Building inspector--part-time
- Mosquito control
- Health education and immunization
- Planning Committee participation

The services offered by the City of LaCrosse include the following:

- Road maintenance and improvement--full-time staff
- Police protection--full-time professional
- Fire protection--full-time professional, class four urban fire insurance rating
- Sanitary sewer system
- Storm sewer system
- Public water system
- Public health services--full-time
- Building inspection--full-time
- Public library
- Parks and recreation--professional staff, summer programs
- Garbage collection and disposal
- Public Housing Authority

It has been established above that the developable areas in the territory have been and are expected to continue growing fairly rapidly. The territory now needs, by virtue of its population and location, a full range of urban services. A comparison of the services available from the city and proposed by the village shows that the city is capable of providing the services and facilities needed while the village does not offer them or intends to provide only limited services (e.g., volunteer fire department vs. a fully staffed professional fire department). Also, the proposed village does not have (as noted above) the financial resources to provide equal services and facilities at this time. The cost to the residents of the lack of such services and facilities is only in part measurable. Lack of public water supply and full-time fire protection has been estimated to cost the owner of a \$15,000 wood frame house in Campbell \$20 per year more in fire insurance costs than the owner of a similar house in LaCrosse. Poor sanitary conditions extract their own toll in doctor bills and personal well being, but such costs are very hard to measure. Lack of storm sewers result in flooded basements, in eroded roadsides observed in the field visit and in stagnant ponds that breed mosquitos.

It is concluded that the level of services, both existing and potential, available from the City of LaCrosse is superior to those proposed by the village.

Table 4

Financial Considerations Related to Annexation of Town of Campbell

## CAPITAL EXPENDITURES

Fire Station and Apparatus	\$ 180,300
Storm Sewer	762,000
Water	1,130,000
Curb and Gutter	388,000
Street Surfacing	1,166,000
Street Equipment	<u>55,275</u>
TOTAL	<u>\$3,681,575</u>

## OPERATING ANNUAL BASIC BUDGET

Income

City Share of Property Tax	\$175,000	
State Shared Taxes	120,100	
State Highway Aid	63,800	
Federal Revenue Sharing	33,000	
Licenses and Fees	<u>2,000</u>	
TOTAL		\$394,000

Expenses

Garbage and Refuse	\$ 17,325	
Additional General Government Personal	46,540	
General Government Expense Unallocated		
and Miscellaneous	25,000	
Parks and Playgrounds	5,000	
Sanitary Sewer Maintenance	8,500	
Fire Protection	168,880	
Police Protection	<u>62,700</u>	
TOTAL		<u>389,000</u>
Excess Annual Income Over Expenditures		<u>\$ 6,000</u>

Source: City of LaCrosse Finance Office.

Table 5

City of LaCrosse, Debt Capacity

1972 Equalized Valuation of City	<u>\$413,506,700</u>
Debt Capacity 5%	<u>\$20,675,335</u>
City Debt Outstanding, excluding Schools & Vocational School Debt	<u>11,424,200</u>
Allowable Future Borrowing Capacity for City Purposes	\$ 9,251,135

Town of Campbell, Debt Capacity

1972 Equalized Valuation of Town of Campbell as shown in 1972 statistical report of Supervisor of Assessments	<u>\$19,315,600</u>
Debt Capacity 5%	<u>965,780</u>

Source: City of LaCrosse Finance Office.

(c) Impact on the Remainder of the Town.

State statute requires that the impact, financial and otherwise, upon the remainder of the town from which the territory is to be incorporated be examined.

The proposal is to incorporate the entire Town of Campbell, and there is thus no remainder to be affected. There is no need to consider this factor in determining the public interest.

(d) Impact on the Metropolitan Community.

State statute requires that consideration be given to the effect upon the future rendering of governmental services both inside the territory proposed for incorporation and elsewhere within the metropolitan community of the proposed incorporation. There shall be an express finding that the proposed incorporation will not substantially hinder the solution of governmental problems affecting the metropolitan community. If such a finding cannot be made, the proposed incorporation cannot be determined to be in the public interest.

Governmental problems in metropolitan communities are many and varied, as evidenced by the problems raised at the LaCrosse Metropolitan Area Public Hearing of the Citizens Study Committee on Metropolitan Problems, held in the LaCrosse City Hall on May 16, 1972. The following partial list is taken from a summary of the testimony prepared by the Study Committee Staff, published October 25, 1972:

- Lack of cooperation among local governments.
- Fragmentation of the urban area into many separate governmental units.
- Substantial inequities in the financing of areawide services and facilities such as sanitary sewage collection and treatment, fire protection, the regional airport, the major street network, and the park system.
- Inequalities in local assessment practices.
- Unequal distribution of the tax base.
- Scarcity of housing, particularly low and moderate income housing.
- Lack of uniform levels and practices in law enforcement.
- Inadequate parks and recreation facilities.
- Pollution control on the Mississippi.
- Protection of scenic and fragile environmental areas, such as the bluffs and the marshes.

Many of these problems stem from the same cause; that of too many individual, autonomous governments.

The U. S. Advisory Commission on Intergovernmental Relations has been concerned with these problems for many years, and has produced a number of reports on various aspects of the subject. In a 1962 report, the following statement of the problem was offered:

"Generally speaking, the larger the number of independent governmental jurisdictions within a metropolitan area the more inequitable and difficult becomes the process of financing those governmental services which by their nature are areawide in character...Even services which do not demand areawide handling, such as education, law enforcement, and health, also involve serious problems of equity with respect to financing and of awkwardness in administration where numerous local governments are involved."<sup>3</sup>

The limited employment and shopping opportunities available in the territory proposed for incorporation have already been mentioned. Other studies which were submitted at the hearing also substantiated the interdependence of the territory with the rest

<sup>3</sup> Alternative Approaches to Governmental Reorganizations in Metropolitan Areas, Advisory Commission on Intergovernmental Relations (Commission Report A-11), June 1962, U. S. Government Printing Office, page 10.



of the metropolitan area. The implications of this were pointed out in the report of the National Commission on Urban Problems:

"Such facts point up the limited meaning of the word 'community' as it is often used with reference only to particular local areas where people reside and are counted for population-census purposes. Individual and family ties to such residential areas are understandably strong and important. But most people in metropolitan areas also have an important stake in the public facilities and services provided in areas where they work or visit. Furthermore, local governments in metropolitan areas must serve not only their resident night-time populations, but also the differing daytime populations resulting from the ebb and flow of metropolitan activities. Yet when these local governments are very small in territory and population, only a limited part of the total population that each government thus serves has any voice in choosing the officials or determining the spending and tax policies that are involved. In turn, these scattered electorates lack an effective tie to the jurisdictions that so strongly affect them. In both directions, one finds taxation, regulation, service and protection without representation."<sup>4</sup>

Clearly, then, the present arrangement of local governments in metropolitan areas is seen as a major cause of governmental problems in metropolitan areas. The search for a workable solution to any problem is usually guided by an ideal, and the ideal in this case has also been expressed by the Advisory Commission on Intergovernmental Relations:

"In principle, local governments should have jurisdiction over a large enough area to permit them to cope adequately with the problems that their citizens expect them to handle. They should be able to raise sufficient revenue, and to do it equitably. They should retain flexibility to adjust their boundaries to meet changing conditions. They should be organized to handle a variety of functions rather than only one or two, so that they can exercise political responsibility for balancing total local needs and resources. They should be able to take advantage of economies of scale, and, at the same time, be accessible to and controllable by the people they serve."<sup>5</sup>

The search for workable solutions to metropolitan governmental problems is still going on, and the Commission has been examining and evaluating these efforts for many years. A 1969 Commission report summarized their findings and recommendations as follows:

"Removing the shackles that frustrate local efforts to marshal the resources required to meet local needs by clarifying the legal powers of general-purpose local governments, authorizing them to determine their own internal structure, modernizing outdated means of controlling local government tax and debt levels, and liberalizing municipal annexation procedures.

Arming local governments with an 'arsenal of weapons' for meeting the challenge of urban growth by facilitating county consolidation, authorizing counties to perform urban functions and to establish subordinate service and taxing areas, empowering major cities and urban counties to create neighborhood 'subunits' of government in order that disaffected citizens may be brought closer to and involved in the process of local government, permitting voluntary transfer of functions between cities and counties, granting authority for intergovernmental contracts and joint service arrangements, encouraging the establishment of metropolitan study commissions, providing for metropolitan functional authorities that offer services requiring areawide handling, and authorizing regional councils of elected officials.

Halting the proliferation of special districts and small nonviable units of local government in metropolitan areas."<sup>6</sup>

<sup>4</sup>Building the American City, Report of the National Commission on Urban Problems to the Congress and to the President of the United States, U. S. Government Printing Office, Washington, D. C., page 329.

<sup>5</sup>Metropolitan America: Challenge to Federalism, Advisory Commission on Intergovernmental Relations (Report M-31), 1966, page 85.

<sup>6</sup>Urban America and the Federal System, Advisory Commission on Intergovernmental Relations (Report M-47), 1969, page 4.

In the metropolitan context, the territory must be considered small and nonviable. Though the total area exceeds 12 square miles, the developable portion of it amounts to slightly more than two square miles. Because of the flood control requirements on one side and the existing municipalities on the other, it has no potential for expansion. It is nonviable in the same sense that it is and is projected to remain dependent on the rest of the metropolitan area for employment of its resident population and for the majority of goods and services needed by its residents. It might be argued that the territory needs the additional powers that would be available to it as a result of incorporation to deal with the problems of land development and provision of services which are or soon will be facing it. The present town government has not, however, made use of all the powers available to it in this respect, and the budget submitted by the petitioners does not propose any substantial changes from the current practices of the town.

In many ways, the problems of a metropolitan area are the problems of the central city of the area. The central city, as the hub of the economic and social life of the area, is required to provide adequate streets and highways for traffic movement, to provide for mass transit service where feasible, to provide major portions of the park system and recreation facilities, to provide public housing for low-income families and individuals, and in some cases to provide sewer and water utilities, fire protection, and other public services of areawide impact. Where the central city has the opportunity to extend its jurisdiction to approximately cover the area which generates a demand for such services and facilities, it is usually able to raise the necessary funds to provide them at a reasonable tax rate. Following are several examples of metropolitan area problems, the solutions to which would be hindered by the proposed incorporation.

Provision of streets and highways. An origin-destination study conducted in 1966 as part of the LaCrosse Urban Area Transportation Study indicated that Campbell residents made 7,704 trips over the urban area street system during a typical day and that 5,556 of these trips (72 percent) had either their origin or destination in the City of LaCrosse. An additional 1,086 trips (14 percent) had an origin or destination outside of the city but made use of city streets since the only access to Campbell is via city streets. The volume of trips has undoubtedly increased with increasing population and the proportion of trips made over city streets is assumed to be approximately the same. One current problem which points up the effect of the proposed incorporation is that of the Clinton Street bridge, which is one of the two access points to the Town of Campbell. The bridge is old and narrow, and needs to be replaced. It lies partly in the city, partly in the town, and is part of a county trunk highway. The county and the town have asked the city to participate in its reconstruction but the city has declined. It appears that the city views improvements to the bridge as being basically for the benefit of another independent unit of government (the town), and the proposed incorporation would only solidify this attitude. As noted above, considerable traffic from Campbell uses city streets, creating costs to the city without creating revenue. Tax revenues to the city from the traffic generators in Campbell would compensate for such expenses, but this will not be possible if the territory becomes incorporated. This problem is not entirely one-sided. Campbell is the home of several substantial marinas which receive traffic originating in LaCrosse. If incorporated, Campbell would have to bear the full cost of local street improvements necessitated by that traffic. If a part of the city, those costs would be spread over the whole city and all of the beneficiaries of the improvement would pay a share instead of only a few.

Provision of bus transit service. The territory does not now have bus transit service, though there are a number of residents who might desire it or benefit from it. The city is presently subsidizing the transit company's operation and it is probably that the city will acquire and operate the system in the near future. The city's policy will become that of not serving areas beyond the corporate limits unless the route pays its own way.<sup>7</sup> Since a route serving Campbell would not likely pay its own operating costs, it is unlikely that it would be served at all if the area were incorporated as a village.

Provision of air transportation facilities. The city owns and operates the major airport serving the metropolitan area, which is located on the northern end of French Island, adjoining the Town of Campbell. Control of land uses in the vicinity of the airport and its approach zones is very important to the operation of the airport, since the intrusion of incompatible uses could lead to curtailment of air transportation activities. The necessary controls will be much more difficult to achieve if the territory is incorporated since a high degree of intergovernmental cooperation would be required and lack of such cooperation was cited as a problem at the Citizens Study Committee hearing cited above. The airport is also an example of the inequities

<sup>7</sup>Letter from W. Peter Gilbertson, Mayor, City of LaCrosse, dated April 9, 1973.

in financing of areawide services. It is wholly owned by the city and, until recently, financed by city revenues, yet it provides an essential service to the entire metropolitan community. In an attempt to spread the cost over a larger population, the city has imposed a one dollar head tax on all passengers boarding flights at the airport. With a better financing arrangement, this might have been avoided.

Provision of public utilities. The city's policy has been not to extend water service to areas outside the corporate limits. If the territory is incorporated, it would have to develop its own public water supply. The city intends to develop new wells on its airport property in any case, and these would likely be connected to city mains across Campbell lands. Thus the major components of two systems would be built side-by-side where one would suffice.

Provision of public housing. The provision of public housing for low-income families is an areawide problem, yet the city's housing authority provides the only such facilities in the area. The petitioners indicate no interest in providing such housing facilities, and the town officials have indicated that they are following a policy of eliminating the substandard housing in Campbell now being occupied by low-income families as it becomes vacant. This has had the effect of increasing the demand for the city's public housing, as reported by the city housing authority. The present waiting list of over 200 includes 13 families from Campbell, and two former Campbell residents now reside in the city's public housing. The Town Chairman, in a letter dated April 26, 1973, indicated that a county housing authority had been created and that the town is working with the authority to develop a housing program. No county facility exists at present to relieve the demand, however, and with the announced cutbacks in federal housing programs it may be quite a while before such housing can be created. Low-rental public housing is best located in urban areas close to stores and places of employment, which creates a potential problem for the county's housing authority because the governing body and the housing authority (if any), of the municipality must give their consent by resolution before the county authority may undertake a project in a municipality. Thus the proposed incorporation would make more difficult the solution to the housing problem by creating another municipality.

Inequalities in assessment practices. This was cited as a problem at the Citizens Study Committee hearing in May of 1972. At the request of the City of LaCrosse, the Supervisor of Assessments in the Eau Claire office of the Wisconsin Department of Revenue prepared coefficient of dispersion charts for both LaCrosse and the Town of Campbell. A copy of the charts and the cover letter are attached to this determination. The charts are based on actual property sales prices and assessments and are a good indicator of the accuracy and equitability of the assessment practices of the unit of government. The chart for the Town of Campbell reveals that substantial over and under valuations exist in the town, resulting in an inequitable distribution of property tax payments. In its presentation at the public hearing, the city demonstrated that the school taxes raised from Campbell were less than the town's pro rata share of school costs on a cost per student basis. It cannot be found from the material available that the town's assessment practices are a contributing factor to that situation, but such school taxes as are levied are certainly distributed unequally among the property owners of the town according to the survey prepared by the Supervisor of Assessments.

Unequal distribution of the tax base. As noted in the preceding section, school tax levies from the territory are low in proportion to the number of students contained in the territory. This is presumed to be a result of a relatively lower per capita equalized value in the town as compared to the City of LaCrosse and other municipalities in the urban area. Since the town does not presently levy a tax for local purposes, this has not been a problem. If the area were incorporated and levying taxes to pay for a level of urban services comparable to those of the City of LaCrosse, this would become a problem for the territory, resulting in a relatively higher tax level for a comparable service level. A likely result of such a situation would be a high level of competition for new high value development and a corresponding decline in intergovernmental cooperation.

For the reasons cited above, it is determined that the proposed incorporation would have an adverse effect upon the solutions to metropolitan community problems.

April 13, 1973

In Reply Please Refer To  
Supervisor of Assessments  
202 Graham Ave.  
Eau Claire, Wisconsin 54701  
Phone 715-836-2866

APR 17 1973

LETTER OF APPRECIATION  
FROM: CHIEF ASSESSOR  
TO: SUPERVISOR OF ASSESSMENTS

•Kenneth Roberts  
Chief Assessor  
City of La Crosse  
City Hall  
La Crosse, Wisconsin 54601

Dear Ken:

I have finally been able to have prepared a coefficient of dispersion chart for both the City of La Crosse and the Town of Campbell. I believe you have had some experience with this process and are aware of what the charts indicate. We have always felt that a dispersion coefficient of 15% or less with a concentration coefficient of 75% or more was very good, while a dispersion coefficient of 25% or more with a concentration coefficient of 60% or less was a rather poor assessment.

I am sure with the foregoing indications that the charts themselves will be very self-explanatory. It would appear that the Town of Campbell should seriously consider some step to improve their assessment.

If I can be of any further help in this matter, please feel free to call on me.

Yours truly,

*Howard G. Reynolds*

Howard G. Reynolds  
Supervisor of Assessments  
Eau Claire Office  
Bureau of Property Taxation

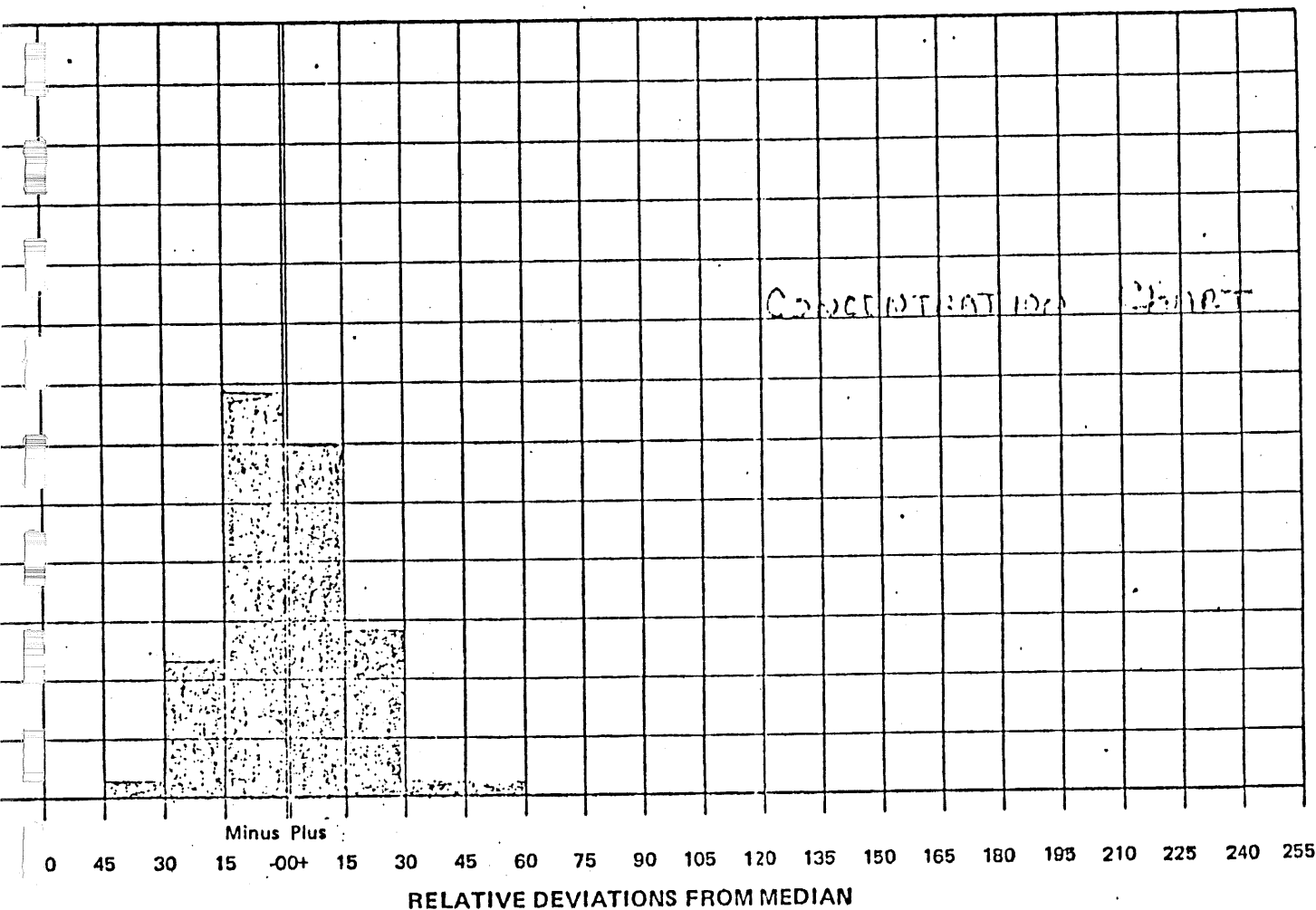
HGR:bk

Enclosures

# ASSESSMENT-SALES RATIO FREQUENCY CHART

Date 1/1 Charted By SA

☒ **C** 1000 County of LA Code       



Aggregate Ratio  
Mean Ratio  
Median Ratio  
Dispersion Coefficient  
Concentration Coefficient  
Price Related Differential  
Assessed Value of Real Estate in District  
Full Value of Real Estate in District

13 and type of sales charted (Enter number of sales charted in each class)

A	B	C	D	E	F1	F2	ALL
13							
666							
619							
60,34,830							
15 004,533							

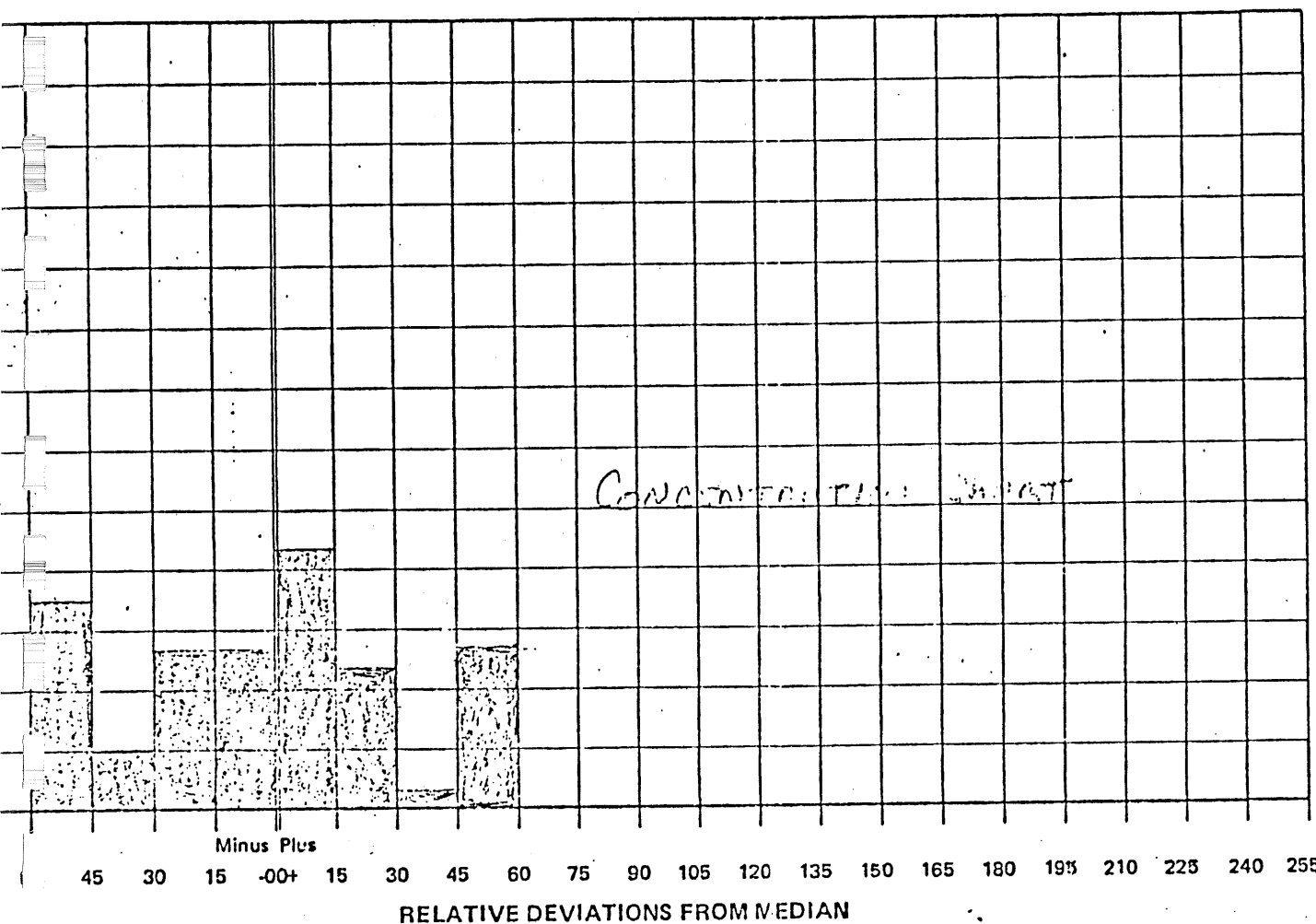
Aggregate Ratio of Real Estate in District  
Land Parcels in District  
Improved Parcels in District



# ASSESSMENT-SALES RATIO FREQUENCY CHART

Date 11/13 Charted By JH

☒ C Camden County of IN Code 001



Aggregate Ratio  
Mean Ratio  
Median Ratio  
Dispersion Coefficient  
Concentration Coefficient  
Price Related Differential  
Assessed Value of Real Estate in District  
Full Value of Real Estate in District

13 and type of sales charted (Enter number of sales charted in each class)

A	B	C	D	E	F1	F2	ALL
<u>33</u>							
<u>61</u>							
<u>18</u>							
<u>13,950</u>							
<u>13,720</u>							

Aggregate Ratio of Real Estate in District  
Land Parcels in District  
Improved Parcel in District

DETERMINATION

For the reasons heretofore cited, and applying the standards set forth in s. 66.016, Wisconsin Statutes, the Director makes the following determination:

THE PETITION AS SUBMITTED SHALL BE DISMISSED.

George A. James

George A. James  
Bureau of Local and Regional Planning

GAJ/RIB:mk

123 West Washington Avenue - Room 753  
Madison, Wisconsin 53702

Dated: May 11, 1973

Copies to: Judge Peter G. Pappas  
Mr. Robert Benson, Designated Representative  
Mr. George Jolivette, Alternate Representative  
Mr. William J. Sauer, Assistant City Attorney, Attorney for Opponents  
Steele, Smyth, Klos & Flynn, Attorneys for Petitioners

## **Attachment 2**

### **1977 decision dismissing petition – In the matter of the Proposed Incorporation of the Village of French Island, La Crosse County**

Inserted on subsequent page(s).

In the Matter of the Proposed :  
Incorporation of the Village of :  
French Island, LaCrosse County :

DETERMINATION OF THE  
DEPARTMENT OF LOCAL  
AFFAIRS AND DEVELOPMENT

On August 22, 1977, there was received at the Department of Local Affairs and Development, State of Wisconsin, in accordance with the provisions of s. 66.014 (8), Wisconsin Statutes, a record relating to a proceeding in the Circuit Court for LaCrosse County to incorporate a village to be known as the Village of French Island, located in Township 104 North, Range 4 West, Town of Campbell, LaCrosse County, and State of Wisconsin, to-wit:

Commencing in the NE $\frac{1}{4}$  of Section 11, Township 104 North, Range 4 West of the 5th principal Meridian, at the point of intersection of the center line of the West Channel of the Mississippi River with the center line of the main East Channel of said river, being a point in the Western boundary of the State of Wisconsin, running thence Southeasterly along the center line of the East or Main Channel of said river to its intersection with the extended South line of Section 30, T 16 N, R 7 W, Thence East along said Section Line and the extension thereof to the center of the Main Channel of the Black River.

Thence Northerly along the center of the Main Channel of the Black River to its intersection with the center of Joe Lynn Slough.

Thence Westerly along the center of Joe Lynn Slough to its intersection with the center of French Slough. Thence Northerly along the center of French Slough to the Southerly right-of-way line of the Chicago, Milwaukee, St. Paul and Pacific Railway. Thence Southeasterly along the Southerly line of said railroad right-of-way and along the extension thereof to the center of the Main Channel of the Black River. Thence Northeasterly along the center of the Main Channel of the Black River to its intersection with the center line of Coleman Slough (Cat-Gut Slough). Run thence Northeasterly along the center line of Coleman Slough to the South right-of-way line of Clinton Street being an extension of the public highway formerly known as Washburns Street according to the recorded Plat of West LaCrosse. Thence East along the South line of Clinton Street to the center line of the Main Channel of the Black River.

Thence Northerly along the center line of the Main Channel of the Black River to the North line of Section 17, T 16 N, R 7 W. Thence West along the North line of said Section 17 and the North line of Section 18, Township and Range aforesaid, to a point 500 feet West of the East line of Section 18. Thence South and parallel to the East line of Section 18, 101.50 feet.

Thence West and parallel to the North line of Section 18 to the East 1/16th line of Section 18, running thence South on the East

1/16th line of Section 18 to the North 1/16th line of Section 18, running thence West on the North 1/16th line of Section 18 to a point 949.12 feet East of the West 1/16th line of said Section 18.

Thence S 30° 38' W 1,190.15 feet.

Thence N 53° 39' W 419.86 feet to the West 1/16th line of said Section 18.

Thence continuing N 53° 39' W 130.14 feet.

Thence S 36° 21' W 800.00 feet.

Thence N 53° 39' W 400.00 feet.

Thence N 36° 21' E 800.00 feet.

Thence N 53° 39' W 550.00 feet.

Thence N 42° 04' E 7.71 feet to the North 1/16th line of said Section 18.

Thence continuing N 42° 04' E 795.67 feet.

Thence N 35° 27' E 561.39 feet to the West 1/16th line of said Section 18 at a point 983.20 feet North of the North 1/16th line of said Section 18.

Running thence North on the West 1/16th line of Section 18 and Section 7, T 16 N, R 7 W, to the South 1/16th line of Section 7.

Running thence West on the South 1/16th line of Section 7 to the West line of Section 7.

Running thence North on the West line of Section 7 and Section 6, T 16 N, R 7 W, to a point on the West line of Section 6, 1,135.00 feet North of the West Quarter Post of Section 6.

Running thence S 42° 00' E 794.10 feet.

Running thence S 42° 01' E 369.90 feet.

Running thence S 42° 17' E 273.80 feet to a point on the East and West  $\frac{1}{4}$  line of Section 6, 960.00 feet East of the West line of Section 6.

Running thence S 46° 16' E 455.30 feet to a point on the West 1/16th line of Section 6, 982.00 feet North of the South 1/16th line of Section 6. Thence North along said West 1/16th line of Section 6 to the North line of Section 6. Thence West along the North line of Section 6, and along the North line of Section 1, T 16 N, R 8 W, to the Northwest corner of Section 1.

Thence North along the East line of Section 35, T 17 N, R 8 W, to the Northeast corner thereof. Thence West along the North line of said Section 35, and along the North line of Sections 34 and 33, T 17 N, R 8 W and extension thereof to the center line of the Main Channel of the Mississippi River, being the Western boundary of the State of Wisconsin. Thence Southerly, downstream along the center of the Main Channel of the Mississippi River to the place of beginning, and contains 7,980 acres, more or less.

to be known and designated as the Village of French Island.



Upon receiving said petition, the Department proceeded to make an investigation in accord with the provisions of section 66.014 (9)(a), necessary to enable it to apply the standards of section 66.016, and to make the determination required of it by section 66.014 (9)(e). The determination required of the Department is one of the following:

1. The petition as submitted shall be dismissed;
2. The petition as submitted shall be granted and an incorporation referendum held;
3. The petition as submitted shall be dismissed with a recommendation that a new petition be submitted to include more or less territory as specified in the findings and determination of the Department.

The standards to be applied by the Department in making said determination are as follows:

66.016 Standards to be applied by the Department. (1) The Department may approve for referendum only those proposed incorporations which meet the following requirements:

(a) Characteristics of territory. The entire territory of the proposed village or city shall be reasonably homogeneous and compact, taking into consideration natural boundaries, natural drainage basin, soil conditions, present and potential transportation facilities, previous political boundaries, boundaries of school districts, shopping and social customs. An isolated municipality shall have a reasonably developed community center, including some or all of such features as retail stores, churches, post office, telephone exchange and similar centers of community activity.

(b) Territory beyond the core. The territory beyond the most densely populated one-half square mile specified in s. 66.015 (1) or the most densely populated square mile specified in s. 66.015 (2) shall have an average of more than 30 housing units per quarter section or an assessed value, as defined in s. 66.021 (1)(b) for real estate tax purposes, more than 25% of which is attributable to existing or potential mercantile, manufacturing or public utility uses. The territory beyond the most densely populated square mile as specified in s. 66.015 (3) or (4) shall have the potential for residential or other urban land use development on a substantial scale within the next three years. The Department may waive these requirements to the extent that water, terrain or geography prevents such development.

(2) In addition to complying with each of the applicable standards set forth in sub. (1) and s. 66.015, any proposed incorporation in order to be approved for referendum must be in the public interest as determined by the Department upon consideration of the following:

(a) Tax revenue. The present and potential sources of tax revenue appear sufficient to defray the anticipated cost of governmental services at a local tax rate which compares favorably with the tax rate in a similar area for the same level of services.

(b) Level of services. The level of governmental services desired or needed by the residents of the territory compared to the level of services offered by the proposed village or city and the level available from a contiguous municipality which files a certified copy of a resolution as provided in s. 66.014 (6).

(c) Impact on the remainder of the town. The impact, financial and otherwise, upon the remainder of the town from which the territory is to be incorporated.

(d) Impact on the metropolitan community. The effect upon the future rendering of governmental services both inside the territory proposed for incorporation and elsewhere within the metropolitan community. There shall be an express finding that the proposed incorporation will not substantially hinder the solution of governmental problems affecting the metropolitan community.

Requests for a hearing were received from representatives of the petitioners and the City of LaCrosse on June 10, 1975 after the initial submittal of the petition to the Department. At that time, a hearing was scheduled but never held because of an appeal by the City of LaCrosse. After resolution of the appeal, the record was submitted again to the Department and a hearing was scheduled. Accordingly, notices were sent and published pursuant to the requirements of s. 66.014 (9)(c).

On November 15, 1977, the hearing was held at the Campbell Town Hall, in the territory proposed to be incorporated, before Marc L. Williamson and Richard I. Bonser. The petitioners for incorporation were represented by Attorney George M. Snodgrass and Attorney John Bosshard, and the City of LaCrosse was represented by City Attorney John K. Flanagan.

Numerous local officials and citizens were present at the hearing, and all present were given an opportunity to be heard. At this hearing, testimony bearing on the proposed incorporation was heard, various documents and other exhibits were introduced for the Department's consideration, and other related information was brought forward. Additional information was subsequently provided after the hearing, under joint agreement of all concerned, by the parties there represented.

The Department has caused an investigation to be made of the information obtained at and after the hearing, from the parties there represented, from various state and local agencies, and from related materials of the Department.

Section 66.014 (9)(g) requires that "The findings of...the department shall be based upon facts as they existed at the time of the filing of the petition," that date being March 27, 1975. Where certain facts concerning the proposed incorporation were unchanged from the earlier (1973) determination of the head of the planning function in the Department, materials from the proceedings at that time and from that earlier determination have been used. Information regarding the period since March 27, 1975 has been used only as it helps clarify the situation at that time.

Based on the above data, the following findings and determinations are made:

#### 1(a) Characteristics of the Territory

The territory proposed for incorporation is a cluster of islands in the Mississippi River bounded on the west by the main channel of the river and the State of Minnesota, on the east and south by the City of LaCrosse and the Black River, and on the north by Lake Onalaska, a flowage of the Mississippi River. It includes the entire Town of Campbell, an area of 12.4 square miles, with 4.2 square miles of land, of which 2.2 square miles on French Island are dry and habitable. The majority of the town lies within the Mississippi River Floodway, and significant portions of the remainder lie in the floodplain adjoining the floodway, leaving 1.74 square miles of land not in the floodplain.

The land is low lying and level to gently rolling in nature. The soils in the floodway portion of the town are poorly drained alluvial soils and river wash; elsewhere they are sandy soils of the Dakota, Plainfield, Meridian and Sparta varieties, which have few limitations for urban development. Septic tanks on these latter soils may pollute the groundwater, however, due to very rapid percolation rates. Groundwater in quantities adequate for domestic use is found at depths of only 30 to 40 feet over most of the island. Bedrock is quite deep throughout the town.

Transportation facilities may serve as connectors between centers of activity or between a center and a surrounding area and as barriers to development and joint activity, the balance of such roles depending on the circumstances of the case at hand. Interstate Highway 90 divides French Island into northern and southern sectors, with an intersection with County Trunk Highway B on the east side of the island. To the west is a pedestrian overpass, and on the west side of the island is the grade-separated crossing by CTH D (Lakeshore Drive). Both points of highway access to the island--I-90 and Clinton Street--pass through the City of LaCrosse. Highway access to certain parts of the city--the airport at the north end of French Island, the industrial area south of the railroad tracks at the south end of the island, and the area south of Clinton Street on Hiawatha Island--must traverse parts of the town. In addition, internal circulation from east to west in the northern part of the island is partly dependent on CTH B which crosses city (airport) territory. City bus service is not available in the territory. Access to intercity bus and rail transportation is relatively convenient to the area in the City of LaCrosse. Air transportation is provided by the City of LaCrosse airport on the island. River port facilities are found in both the town and the City of LaCrosse.

The territory proposed for incorporation is part of the LaCrosse school district and contains an elementary school, although high school students attend schools in the City of LaCrosse.

The petitioners presented information on social activities in the town, revealing a pattern fairly typical of an area the size of the proposed village, with some additional activities focused on the water resources available. There appears to be some degree of social and economic cohesion within the territory according to a survey prepared by James A. Anderson, Ph.D., for the petitioners in the previous petition.<sup>1</sup> In a sample of 150 households in the area, Dr. Anderson reported that responses to his telephone survey showed more similarities to patterns usually associated with small rural communities than to patterns associated with newly developed suburban clusters of similar size. However, although Dr. Anderson examined the internal relationships in Campbell, he did not include any questions concerning the relationships and activity patterns between Campbell and the rest of the LaCrosse area, for example, the membership of town residents in churches in the City of LaCrosse.

The territory also contains both commercial and industrial land uses, although they fall short of meeting the needs of the residents for goods, services, and employment. Businesses listed by the petitioners include two grocery stores, barber and beauty shops, motorcycle and sporting goods sales and service, a laundry/dry cleaning plant, a restaurant and motel, and eight bars. On the other hand, the territory lacks local sources of a number of convenience and durable goods and professional services. At the time of the previous petition for incorporation, estimates for employment in the territory ranged from 215 to 256 positions. The petitioners now have presented a survey indicating 347 people are employed in the territory, although they did not distinguish between full-time and part-time. Other testimony indicated there are a substantial number of part-time employees. The city estimates the current number of jobs in the territory to be

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<sup>1</sup> Anderson, James A., A Survey of the Town of Campbell, Unpublished, 1973.

215, or one for every 17.3 residents of the town, compared to one job for each 3.3 residents of LaCrosse County. It would also indicate that there are about 910 more workers residing than working in the Town of Campbell. Granting some imprecision in the data, it is still apparent that only about one-third of the resident labor force was employed in the Town of Campbell in 1975.

Despite internal activities and some evidence of cross-commuting for social purposes, shopping, and employment, the territory has major ties to the City of LaCrosse.

Based on the information above concerning transportation facilities, governmental boundaries, social customs, shopping patterns, and employment, it is found that the territory is not reasonably compact and homogeneous.

#### 1(b) Territory Beyond the Core

The petitioners have designated the area bounded on the north by the LaCrosse city limits and Rochelle Road, on the east by Coleman Slough, on the west by French Slough, and on the south by a line between sloughs just north of Elm Street as the core square mile. As noted above, the area available for development outside the floodplain is 1.74 square miles, and the total developable area, including floodplains developable with some precautions is 2.2 square miles or 17.7 percent of the total land and water area of the proposed village.

Until the 1950's, the southern part of the island was a depressed semi-rural residential area subject to periodic flooding and plagued with poor sanitary conditions and substandard housing. The northern part of the island was primarily farmland. Subsequently, the area was subjected to increasing development pressure with some redevelopment as well as general growth to the north.

Table 1 presents data on population changes in the LaCrosse area since 1960. Population growth rates in the Town of Campbell have been representative of the suburban LaCrosse area or slightly lower.

TABLE 1  
POPULATION, 1960-1976

Place	Population Persons			Percent Change	
	1960	1970	1976	1960-1970	1970-1976
City of LaCrosse	47,575	51,153	48,864	7.5%	-4.5%
City of Onlaska	3,161	4,909	7,357*	55.3%	49.9%
Town of Medary	1,563	2,333	2,643	49.3%	13.3%
Town of Campbell	2,296	3,327	3,712*	44.9%	11.6%
Town of Onalaska	1,711	2,973	4,053*	73.8%	36.3%
Town of Shelby	5,458	4,600**	5,333*	-15.7%	15.9%
LaCrosse County	72,465	80,468	85,883*	11.0%	6.7%

Source: U. S. Bureau of the Census.

\* State of Wisconsin January 1, 1976 Final Population Estimates, Wisconsin Department of Administration.

\*\* This figure resulted from a special census after the town objected to the original count of 3,733.

The General Plan for the LaCrosse Area anticipates a total population of 5,620 to 6,450 by 1990, when the territory should be fully developed, having utilized the existing 0.47 square miles of undeveloped area.

Testimony by local officials indicated that the bulk of development since 1970 has been in single-family homes, with more rapid growth to the north in more recent years. Building permits issued in 1975 included 47 for new single-family homes, two for apartments totalling 14 units, one for a commercial use (Ramada Inn), and numerous miscellaneous permits, including additions and alterations with an estimated total value of \$1,887,000. An undetermined but relatively small number of substandard dwellings were condemned and demolished in recent years. This growth is substantial in relation to the 1,168 dwellings in 1972 and the estimated 1,300 in 1975.

Table 2 shows that the valuation growth rate of the Town of Campbell was among the highest in the area from 1970 to 1975. Other data from the petitioners suggest that mercantile valuation grew the most rapidly in recent years, probably reflecting the construction of the Ramada Inn, with residential growth close behind. The proportion in manufacturing, agriculture, and other categories in 1975 was quite small.

TABLE 2  
COMPARATIVE EQUALIZED (FULL) REAL PROPERTY VALUATIONS,  
1975, AND PERCENT CHANGE, 1970-1975

<u>Place</u>	<u>Total Valuation, 1975</u>	<u>Percent Change, 1970-1975</u>
City of LaCrosse	\$446,277,050	42.6%
City of Onalaska	44,273,800	114.7%
Town of Medary	28,549,500	95.2%
Town of Campbell	30,957,100	105.7%
Town of Onalaska	32,396,800	121.2%
Town of Shelby	53,152,900	70.5%
LaCrosse County	759,608,010	64.5%

Source: Determination of the Head of the Planning Function In the Matter of the Proposed Incorporation of the Village of Medary, March 1, 1977.

It should be noted also that s. 66.015 (5) requires a minimum area of four square miles for an incorporation within five miles of a Class 2 city, which is the situation in this present case. The larger area is required for a metropolitan area incorporation to ensure that it will have adequate area and potential tax base to perform and to support the necessary urban services at a tax rate comparable to that of similar municipalities.

The territory does, in fact, meet the four square mile criterion. The law does not, however, state whether or not the proposed incorporation shall contain at least that much area reasonably suited for development. We conclude that it would be an abuse of the Department's discretion to waive the requirements of s. 66.016 (1)(b) to the extent that water, terrain, or geography prevent development in this instance, where over 80 percent of the total area and almost half of the minimum four-square-mile area are undevelopable. Federal ownership of large parts of the undevelopable area virtually guarantees that the developable area can be expanded little. Also, there may be few or no



opportunities for the community to grow by means of annexation, so that it might well remain forever the same size at which it was incorporated. This is the case with the present proposal.

It is concluded that, despite the prospect of substantial development in a small part of the territory, most of the territory beyond the core does not have potential for substantial urban development within three years.

## 2(a) Tax Revenue

Services available from the Town of Campbell are discussed in the following section; the petitioners propose to continue these services basically unchanged, and their proposed budget is similar to the current town budget.

For some years, the Town of Campbell levied no local taxes. The full value tax rate for local government was 0.07 mills in 1972, 0.02 in 1973, 0.76 in 1974, and 4.17 in 1975. In 1975, that was the highest town tax rate in the county, slightly below the village average of 5.74 mills, and well below the city average of 9.01 mills. The same year, the statewide averages were 5.09 mills for villages and 9.79 mills for cities. Therefore, the proposed budget would appear likely to produce a tax rate comparable to those of villages in the county and statewide.

The proposed village budget has been compared with the proposed budget for 1978 of the Village of West Salem. Although the budgets are not directly comparable from the information presented, the local levies for local government purposes are similar. The proposed West Salem budget appears to allocate more to services, such as public safety, recreation, and public works, but less to debt service. The local full value tax rate has been higher for several years in West Salem than in the Town of Campbell.

The 1975 full value of taxable property in the town was \$32,992,700, yielding a limit on general obligation bonded indebtedness of \$1,649,635, although more recent increases in valuation have raised this substantially. Data submitted did not describe general obligation debt in 1975; in 1977, it was \$417,299, indicating a reserve bonding capacity of about \$1.25-\$1.75 million.

The City of LaCrosse has expressed willingness to annex the territory, which requires a comparison of services, which will be done in the following section. Of interest here is the cost to the town of providing services comparable to those in the city. The city has estimated the cost of capital improvements at more than \$5,200,000 and annual operating costs of \$766,020, of which \$384,806 would have to be raised from property taxes in the territory (at 8.99 mills). These cost estimates must be reduced somewhat to allow for conditions in 1975. Interpolating between these figures and the city's estimates of \$3.6 million of capital costs and annual operating costs of \$389,000 for providing services in 1973 gives figures of about \$4.4 million capital costs and \$578,000 annual operating costs in 1975. This was clearly beyond the bonding ability of the territory and was also beyond its ability to raise annual taxes at the average rate for villages in LaCrosse County in 1975 (5.74 mills, \$189,378) or at the rate for the Village of West Salem (8.39 mills, \$276,809).

While immediate implementation of all these improvements and all the improvements proposed in the City of LaCrosse's capital improvements program would approach or even exceed the city's bonding capacity, certain improvements would be financed on a pay-as-you go basis, others might be supported by grant monies, and, as a last resort, projects could be deferred, as they now sometimes are.

It is thus concluded that the proposed village would be able to finance its basic government operations and a variety of services including but not limited to the services presently provided by the town, but that it could not provide services equal to those offered in the City of LaCrosse.

## 2(b) Level of Services

Testimony has indicated local approval of services presently provided by the town, and therefore of similar services proposed by the petitioners. Since the City of LaCrosse did adopt a resolution of willingness to annex the territory, a comparison of services is required.

**Police Protection:** The town employs two full-time officers who, working 40 hours per week each, would provide less than half-time service to the town. They are supplemented, although apparently not on any specified schedule, by county sheriff's department and traffic department patrols. There are also 15 uniformed emergency government officers available for emergency work and special occasions. The City of LaCrosse would assign about six officers to provide a level of service equivalent to the city's.

**Fire Protection:** Comparison of fire protection services is complicated by several factors, including access and water supply. The town, with a 28-member volunteer department, operates on a tanker relay system for water supply in the absence of a public water supply with hydrants and has a Class 9 fire insurance rating. The city has a full-time department, a public water supply, and a Class 4 rating. The town fire department is slower in response time than a full-time department would be but has on at least one occasion responded more quickly than the city has to a fire on city property at the southern end of French Island. This is further complicated by the rated load limit on the Clinton Street bridge which is well below the weight of most fire-fighting equipment. Substantial improvement of fire protection would appear to require both a full-time fire department and a public water supply system. In 1973, it was estimated that the owner of a \$15,000 frame house would save \$20 per year in fire insurance premiums by such upgrading.

**Water Supply:** Residents of the town have individual wells, although there are three small public wells for fire-fighting purposes only. The city has found that high-quality water in large volumes is available on its airport property, and one well there is now connected to the north LaCrosse area. The city has cited potential health hazards in the use of private wells which are less stringently monitored, especially in areas subject to pollution by flooding.

**Sewage Disposal:** The town's utility district provides mains for sewage collection throughout most of French Island and transports wastes to the LaCrosse sewage treatment plant. Treatment costs are the subject of a yearly contract.

**Roads and Streets:** Major road and street work in the town is done by the county on a 50-50 cost sharing basis, although the town has a truck and tractor and an employee who does maintenance work. Snowplowing is done by a private firm under contract to the town. The City of LaCrosse has a full-time staff for such work.

**Administrative Facilities:** A new town hall was built in 1975 and houses town administrative facilities including the code inspector's office, the fire department, the police department, the fire department, meetings, and occasional recreational activities.

Planning: The Town of Campbell has participated for many years in comprehensive planning activities to help manage its growth. It is a member of the LaCrosse Area Planning Committee and is covered by the LaCrosse Area General Plan. It also lies within the Mississippi River Regional Planning Commission and is eligible to receive professional planning services from that agency. It does not employ full-time staff as the City of LaCrosse does, but has some of the benefit of such staff by virtue of city staffing of the area-wide planning committee.

Development Control: The town is covered by the county zoning and floodplain zoning ordinances, and the petitioners have indicated that similar ordinances would be adopted by a village. It does not have subdivision regulations but is covered by the extraterritorial application of the city's codes. The city has expressed concern over private water supply and storm drainage, but has granted waivers upon receipt of evidence that the town would be responsible for such factors. The town has several construction codes and qualified part-time inspectors. The city has full-time staff.

Public Transit: The town has no public transit, although there have been periodic discussions hinging on town assumption of a share of capital costs and operating deficits. Should it become part of the city, it would receive bus service.

Trash Collection and Disposal: Both governments contract with private firms for collection; and the town's wastes are taken to the Onalaska landfill; although the county landfill, where the city's wastes are taken, is also available.

Parks and Recreation: The town owns or rents a number of small park sites and depends on volunteers for most program direction. LaCrosse has a full-time staff.

Library Service: Campbell residents have a branch of the county library and are also eligible to use the city library by virtue of the city library's status as the central facility for a four-county system.

Assessment: Testimony showed a more equitable pattern of assessment in the City of LaCrosse.

The town has indicated there is a need for two major capital improvements in the next few years namely, the Clinton Street bridge and installing a public water system.

It has been established above that the developable areas in the territory have been and are expected to continue growing fairly rapidly. The territory now needs, by virtue of its population and location, a full range of urban services. A comparison of the services available from the city and proposed by the village shows that the city is capable of providing the services and facilities needed while the village does not offer them or intends to provide only limited services (e.g., volunteer fire department vs. a fully staffed professional fire department). Also, the proposed village does not have (as noted above) the financial resources to provide equal services and facilities at this time.

It is concluded that the level of services, both existing and potential, available from the City of LaCrosse is superior to those proposed by the village.

## 2(c) Impact on the Remainder of the Town

Because the petition for incorporation includes the whole town, there is no impact to be evaluated.

2(d) Impact on the Metropolitan Community.

The principles of government particularly applicable to metropolitan areas can be found in the reports of several national commissions and study groups. The U.S. Advisory Commission on Intergovernmental Relations has been concerned with these problems for many years. In a 1962 report, the following statement of the problem was offered:

"Generally speaking, the larger the number of independent governmental jurisdictions within a metropolitan area the more inequitable and difficult becomes the process of financing those governmental services which by their nature are areawide in character...Even services which do not demand areawide handling, such as education, law enforcement, and health, also involve serious problems of equity with respect to financing and of awkwardness in administration where numerous local governments are involved."

Clearly, then, the present arrangement of local governments in metropolitan areas is seen as a major cause of governmental problems in metropolitan areas. The search for a workable solution to any problem is usually guided by an ideal, and the ideal in this case has also been expressed by the Advisory Commission on Intergovernmental Relations:

"In principle, local governments should have jurisdiction over a large enough area to permit them to cope adequately with the problems that their citizens expect them to handle. They should be able to raise sufficient revenue, and to do it equitably. They should retain flexibility to adjust their boundaries to meet changing conditions. They should be organized to handle a variety of functions rather than only one or two, so that they can exercise political responsibility for balancing total local needs and resources. They should be able to take advantage of economies of scale, and, at the same time, be accessible to and controllable by the people they serve."

A 1969 commission report summarized recommendations for changes needed to deal with metropolitan problems, including:

"Granting authority for intergovernmental contracts and joint service arrangements, encouraging the establishment of metropolitan study commissions, providing for metropolitan functional authorities that offer services requiring areawide handling, and authorizing regional councils of elected officials.

Halting the proliferation of special districts and small nonviable units of local government in metropolitan areas."

<sup>2</sup> Alternative Approaches to Governmental Reorganizations in Metropolitan Areas, Advisory Commission on Intergovernmental Relations (Commission Report A-11), June 1962; U.S. Government Printing Office, page 10.

<sup>3</sup> Metropolitan America: Challenge to Federalism, Advisory Commission on Intergovernmental Relations (Report M-31), 1966, page 85.

<sup>4</sup> Urban American and the Federal System, Advisory Commission on Intergovernmental Relations (Report M-47), 1969, page 4.

More recently, the Governor's Commission on State-Local Relations and Financing Policy echoed many of these concerns. Among their suggestions is this statement of priority in multigovernmental areas:

"A city or village should have the 'right of first refusal' to annex the territory,<sup>5</sup> when contiguous unincorporated territory petitions for incorporation."

There is no doubt that the territory is experiencing pressures for urban development, and that these pressures will likely continue to grow.

Testimony by the petitioners and local officials was largely to the point that they wished to protect the integrity of the current town borders. They did not claim to be hampered by the powers available to them in dealing with local issues, except insofar as annexations would upset services and financial affairs. This does not appear to present a great problem, given the fact that there have been few annexations in recent years except those connected with the development of the airport.

In many ways, the problems of a metropolitan area are the problems of the central city of the area. The central city, as the hub of the economic and social life of the area, is required to provide adequate streets and highways for traffic movement, to provide for mass transit service where feasible, to provide major portions of the park system and recreation facilities, to provide public housing for low-income families and individuals, to provide the infrastructure necessary for major health and educational facilities, and in some cases to provide sewer and water utilities, economic development, fire protection, and other public services of areawide impact. Where the central city has the opportunity to extend its jurisdiction to approximately cover the area which generates a demand for such services and facilities, it is usually able to raise the necessary funds to provide them at a reasonable tax rate. Where it cannot, tax-exempt development removes property from the tax rolls and the municipality must face increased service demands with a diminished revenue capacity. Following are several examples of metropolitan area problems, the solutions to which would be hindered by the proposed incorporation.

**Provision of Streets and Highways:** An origin-destination study conducted in 1966 as part of the LaCrosse Urban Area Transportation Study indicated that Campbell residents made 7,704 trips over the urban area street system during a typical day and that 5,556 of these trips (72 percent) had either their origin or destination in the City of LaCrosse. An additional 1,086 trips (14 percent) had an origin or destination outside of the city but made use of city streets, since the only access to Campbell is via city streets. The volume of trips has undoubtedly increased with increasing population, and the proportion of trips made over city streets is assumed to be approximately the same. One current problem which points up the effect of the proposed incorporation is that of the Clinton Street bridge, which is one of the two access points to the Town of Campbell. The bridge is old and narrow, and needs to be replaced. It lies partly in the city, partly in the town, and is part of a county trunk highway. The county and the town have asked the city to participate in its reconstruction, but the city has declined. It appears that the city views improvements to the bridge as being basically for the benefit of another independent unit of government (the town), and the proposed incorporation would only solidify this attitude. As noted above, considerable traffic from Campbell uses

<sup>5</sup> Final Report of the Commission on State-Local Relations and Financing Policy, January, 1977, page 196.



city streets, creating costs to the city without creating revenue. Tax revenues to the city from the traffic generators in Campbell would compensate for such expenses, but this will not be possible if the territory becomes incorporated. This problem is not entirely one-sided. Campbell is the home of several substantial marinas which receive traffic originating in LaCrosse. If incorporated, Campbell would have to bear the full cost of local street improvements necessitated by that traffic. If a part of the city, those costs would be spread over the whole city and all of the beneficiaries of the improvement would pay a share instead of only a few.

**Provision of Bus Transit Service:** The territory does not now have bus transit service, though there are a number of residents who might desire it or benefit from it. The city's policy has been not to serve areas beyond the corporate limits unless the route pays its own way. Since a route serving Campbell would not likely pay its own operating costs, it is unlikely that it would be served at all if the area were incorporated as a village. The City of LaCrosse's population has fallen below 50,000 since 1970. Should the population not exceed 50,000 by the 1980 census, the city would lose eligibility for the Urban Mass Transit program which provides financial assistance for operating deficits and capital expenditures. Although annexations from the Town of Campbell may not occur, the city should not be denied the opportunity.

**Provision of Air Transportation Facilities:** Control of land uses in the vicinity of the airport and its approach zones is very important to the operation of the airport, since the intrusion of incompatible uses could lead to curtailment of air transportation activities. The necessary controls will be much more difficult to achieve if the territory is incorporated since a high degree of intergovernmental cooperation would be required, and, in fact, the city has indicated that the Town of Campbell has given indications that it would resist more stringent height restrictions in the approach zones. The airport is also an example of the inequities in financing areawide services in that it is financed by the city but provides an essential service to the metropolitan community. Should the city not be able to finance improvements, it would be to the disadvantage of the entire area.

**Provision of Public Utilities:** The city's policy has been not to extend water service to areas outside the corporate limits. If the territory were incorporated, it would have to develop its own public water supply. The city has developed a well on its airport property connected to city mains. Thus the major components of two systems would be built side-by-side where one would suffice.

**Provision of Public Housing:** The provision of housing for low-income families is an areawide problem. As the town followed a policy of eliminating substandard housing, demands have arisen on the part of Town of Campbell residents for public housing in the City of LaCrosse Housing Authority's projects. Insofar as the increased demand outstrips the available housing, and longer waiting lists are the result, the metropolitan problem is aggravated. The proposed incorporation could also make more difficult the task of a county housing authority, because it is necessary to get the consent by resolution of the governing body and the housing authority (if any) of the municipality.

**Inequalities in Assessment Practices:** This was cited as a problem at a hearing of the Citizens Study Committee on Metropolitan Problems in LaCrosse in May 1972. In its presentation at the public hearing on the current petition, city officials presented information showing, first, that the school taxes per student raised from Campbell were less than those raised from the city and the rest of the school district and, second, that assessments in the town varied more from actual sales prices than did assessments in


the city, especially in the proportion which were undervalued. While the lower valuation is made up to some degree by state aids, such school taxes as are levied are certainly distributed unequally among the property owners of the town and may also negatively affect property owners in the rest of the school district, although the material presented was not conclusive on this latter point.

For the reasons cited above, it is determined that the proposed incorporation would have an adverse effect upon the solutions to metropolitan community problems.

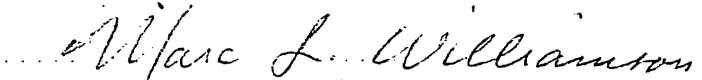
#### DETERMINATION

For the reasons heretofore cited, and applying the standards set forth in s. 66.016, Wisconsin Statutes, the Department makes the following determination.

THE PETITION AS SUBMITTED SHALL BE DISMISSED



Larry J. Brown, Administrator  
Division of State-Local Affairs  
Department of Local Affairs and  
Development



Marc L. Williamson, Hearing Officer  
Department of Local Affairs and  
Development

LJB/MLW:mdk  
2-114

123 West Washington Avenue  
Madison, WI 53702

Dated: December 27, 1977

Copies to: The Honorable Peter G. Pappas, Circuit Judge  
Mr. George M. Snodgrass, Attorney for the Petitioners  
Mr. John K. Flanagan, City Attorney, LaCrosse  
Ms. Mary A. Ritchie, Designated Representative  
Mr. Aubrey Kroner, Clerk, City of LaCrosse  
Mr. Donald E. Huggett, Clerk, City of Onalaska  
Mr. Arnold Every, Clerk, Town of Campbell

### Attachment 3

## Annexations from the Town of Campbell to the City of La Crosse

YEAR	AREA/DESCRIPTION	ACRES	FROM
1887	E ½ SEC. 32 & 29; W ½ SEC. 33; W ½ OF W ½ SEC. 28 & 21	1932.5	NO LAX & CAMPBELL
1954	PORTION OF MUNICIPAL AIRPORT	904.5	T CAMPBELL & T ONA
1969	AIRPORT RUNWAY EXT. (PT SEC. 6-16-7, N OF EXIST CITY LIMITS)	213.67	T CAMPBELL & T ONA
1939	NSP CO., FRENCH ISLAND, PT GOV LOTS 6 & ALL 7; SEC 30-16-7	89	TOWN OF CAMPBELL
1945	C.B.&Q. PROPERTY, NORTH END OF LA CROSSE	40	TOWN OF CAMPBELL
1948	AIRPORT LANDS; NORTH OF SALEM ROAD	266	TOWN OF CAMPBELL
1951	NORTH SIDE DUMP	77	TOWN OF CAMPBELL
1961	SW APPROACH-AIRPORT (CALLAWAY & JOLIVETTE PROP)	37.07	TOWN OF CAMPBELL
1972	TOWN OF CAMPBELL - ALL (RESOLUTION TO ANNEX)		TOWN OF CAMPBELL
1975	TOWN OF CAMPBELL - CERTAIN TERRITORY		TOWN OF CAMPBELL
1976	TIPPMAN PROPERTY BY AIRPORT (PROBLEM-FLOOD ZONING)	4.81	TOWN OF CAMPBELL
1978	GROSS PROPERTY BY AIRPORT	0.5	TOWN OF CAMPBELL
1982	CITY LAND ACQ FROM UWL NEAR AIRPORT (INT IND PARK)	46.662	TOWN OF CAMPBELL
1991	BREVIK PROPERTY (2604 FANTA REED ROAD)	0.17	TOWN OF CAMPBELL
1993	STUHR PROPERTY BY AIRPORT (2754 DEL RAY AVE)	0.61	TOWN OF CAMPBELL
1993	CITY-OWNED AIRPORT LAND	1.63	TOWN OF CAMPBELL
1994	DEBAUCHE REAL ESTATE PROPERTY ON FANTA REED RD	0.76	TOWN OF CAMPBELL
1994	MUELLER/KRAUSE/ROELICH PROPERTY (1200 BAINBRIDGE ST)	2.8	TOWN OF CAMPBELL
1995	CITY-OWNED AIRPORT LAND (TRAVELLI)	0.59	TOWN OF CAMPBELL
1996	TRUEBLOOD PROPERTY - 1324,1325,1326 NAKOMIS AVENUE	8.4	TOWN OF CAMPBELL
1996	McCORMICK PROPERTY - 1352 NAKOMIS AVE	7	TOWN OF CAMPBELL
1996	SMITH, VOGEL ET AL - 1329, 1334, 1335, 1338, 1339 NAKOMIS AVE	5.9	TOWN OF CAMPBELL
1996	BECKER, ET AL - 11 PROPERTIES ON NAKOMIS AVE	27.4	TOWN OF CAMPBELL
1997	EDWARDS, ET AL - ISLAND ESTATES MOBILE HOME PARK	101.42	TOWN OF CAMPBELL
1997	BRIGGS PROPERTY - 1512 NAKOMIS AVE	0.39	TOWN OF CAMPBELL
1997	DAHLE PROPERTY - 1511 NAKOMIS AVE	0.46	TOWN OF CAMPBELL
1997	GALLAGHER, PECKHAM, DENISEN - 1820, 1827, 1831 NAKOMIS AVE	0.81	TOWN OF CAMPBELL
1997	HENRIKSEN, PFISTER - 1330, 1333 NAKOMIS AVE	0.7	TOWN OF CAMPBELL
1997	MAHNKE, SWANSON, SCOTT - 1700, 1720, 1722 NAKOMIS AVE	1.46	TOWN OF CAMPBELL
1997	MORKWED, RIESE - 1906, 1914 NAKOMIS AVE	4.9	TOWN OF CAMPBELL
1997	SCHROEDER PROPERTY - 1835 NAKOMIS AVE	0.7	TOWN OF CAMPBELL
1997	WAKEEN PROPERTY - 1815 NAKOMIS AVE	0.42	TOWN OF CAMPBELL
1997	GIESE PROPERTY - 1711 NAKOMIS AVE	0.27	TOWN OF CAMPBELL
1997	HOFFMAN, LASS, HUBER - 1414,1409,1411,1407 NAKOMIS AVE	1.5	TOWN OF CAMPBELL
1997	LASS PROPERTY - NAKOMIS AVE		TOWN OF CAMPBELL
1997	BERTRAM PROPERTY - 1933 NAKOMIS AVE	1.67	TOWN OF CAMPBELL
1997	GALLAGHER PROPERTY - 1820 NAKOMIS AVE (SEE ORD #3656)	0.04	TOWN OF CAMPBELL
1997	BURRITT PROPERTY - 1402, 1404 NAKOMIS AVE	0.5	TOWN OF CAMPBELL
1997	JOHNSON PROPERTY - NAKOMIS AVE	0.3	TOWN OF CAMPBELL
1997	JANDT PROPERTY - 1604 NAKOMIS AVE	0.58	TOWN OF CAMPBELL
1997	BOYD PROPERTY - 1931 CHEROKEE AVE	0.46	TOWN OF CAMPBELL
1997	BINSFELD, ET AL - 1839, 1901, 1913, 1909 CHEROKEE AVE	8.29	TOWN OF CAMPBELL
1997	MELBY PROPERTY - 413 CENTRAL ROAD (BY AIRPORT)	0.2	TOWN OF CAMPBELL
1997	PLUEGER PROPERTY - 1516 NAKOMIS AVE	0.43	TOWN OF CAMPBELL
1999	GRAF PROPERTY - 1503 NAKOMIS AVE	0.47	TOWN OF CAMPBELL
2000	SMITH/ALBERTS/GRANT/PETRAS- 1334, 1335, 1338, 1339 NAKOMIS	1.29	TOWN OF CAMPBELL
2001	3431 LAKESHORE DR	0.47	TOWN OF CAMPBELL
2002	3431 LAKESHORE DR	0.01	TOWN OF CAMPBELL
2002	1616 NAKOMIS AVE	0.26	TOWN OF CAMPBELL
2002	AIRPORT PROPERTY- 1917 CHEROKEE	0.34	TOWN OF CAMPBELL
2005	BINSFELD PROPERTY- 1808 NAKOMIS AVE	0.61	TOWN OF CAMPBELL

2005	GESKE PROPERTY- 1525 NAKOMIS AVE	0.33	TOWN OF CAMPBELL
2006	BEYER PROPERTY- 1360 NAKOMIS AVE	0.65	TOWN OF CAMPBELL
2207	MYERS PROPERTY- 1608 NAKOMIS AVE	0.35	TOWN OF CAMPBELL
2007	1520 NAKOMIS AVE	0.4	TOWN OF CAMPBELL
2010	WELCH PROPERTY- 1941 NAKOMIS AVE	0.5	TOWN OF CAMPBELL
2014	BINSFELD PROPERTY- 1839 CHEROKEE AVE	0.79	TOWN OF CAMPBELL
2014	LAKOWSKE PROPERTY- 1938 NAKOMIS AVE	0.38	TOWN OF CAMPBELL
2016	DELAGRAAVE PROPERTY- 1903 NAKOMIS AVE	0.28	TOWN OF CAMPBELL
2016	AIRPORT PARCEL- 608 DAKOTA ST	0.5	TOWN OF CAMPBELL
2017	ALLEN PROPERTY- 1504 NAKOMIS AVE	0.34	TOWN OF CAMPBELL
2017	UHLS PROPERTY- 1350 NAKOMIS AVE	0.32	TOWN OF CAMPBELL
2022	AIRPORT PARCEL- 3503 LAKESHORE DR	0.32	TOWN OF CAMPBELL
2024	SCHMIDT PROPERTY- 1612 NAKOMIS AVE	0.33	TOWN OF CAMPBELL

**Attachment 4**

**Town of Campbell 2026 Budget**

Inserted on subsequent page(s).



NOTICE OF PUBLIC HEARING  
FOR THE TOWN OF CAMPBELL  
LA CROSSE COUNTY  
PROPOSED 2026 OPERATING BUDGET

Notice is hereby given that on Monday, November 17, 2025 at 6:00 p.m. at the Campbell Town Hall a PUBLIC HEARING on the GENERAL FUND PROPOSED 2020 BUDGET and UTILITY DISTRICT #1 PROPOSED 2026 BUDGET of the Town of Campbell, La Crosse County will be held. The proposed budget in detail is available for inspection at the Town Hall, 2219 Bainbridge Street, Monday through Friday. The following is a summary of the proposed 2026 budget:

**POSTED**  
**10/31/2025**  
**3:00 P.M.**  
**Campbell Town Hall**  
**Quillin's**  
**Kwik Trip**  
**Townofcampbellwi.gov**  
**Attest: Michelle Stahl**

<b>Revenues</b>	<b>2025 Budget</b>	<b>2026 Proposed</b>	<b>% Change</b>
<b>Taxes:</b>			
General Property Taxes	\$ 1,445,544	\$ 1,444,748	-0.06%
Other Taxes	40,250.00	35,750.00	-11.18%
Special Assessments	250	250	0.00%
Intergovernmental Revenues	716,609	755,612	5.44%
Licenses and Permits	74,529	63,529	-14.76%
Fines, Forfeits and Penalties	17,500	17,500	0.00%
Public Charges for Services	6,500	6,500	0.00%
Intergovernmental Charges for Services	3,135	3,135	0.00%
Miscellaneous Revenue	130,293	81,681	-37.31%
<b>Other Financing Sources</b>			
Note Proceeds	250,000	285,000	14.00%
Fund Balance Applied	614,400	419,258	-31.76%
Sale of Fixed Assets	4,000	-	-100.00%
<b>TOTAL REVENUES</b>	<b>\$ 3,303,010.00</b>	<b>\$ 3,112,963.00</b>	<b>-5.75%</b>

<b>Expenditures</b>			
General Government	\$ 523,948	\$ 401,896	-23.29%
Public Safety	953,582	1,012,624	6.19%
Public Works	790,614	747,449	-5.46%
Culture, Recreation and Education	69,000	54,375	-21.20%
Capital Outlay	404,500	278,590	-31.13%
Debt Service	561,366	618,028	10.09%
<b>TOTAL EXPENDITURES</b>	<b>\$ 3,303,010</b>	<b>\$ 3,112,962</b>	<b>\$(0)</b>

<b>All Government &amp; Proprietary Funds Combined</b>	<b>Fund Balance 1/1/2025</b>	<b>Total Revenues</b>	<b>Total Expenditures</b>	<b>Projected Fund Balance</b>	<b>Property Tax Contribution</b>
General Government	1,571,711	3,258,579	3,303,011	1,527,279	885,402
Debt Service		559,346	559,346		559,346
Sewer Enterprise Fund	4,219,056	1,191,487	673,404	4,737,139	

\*\*Outstanding indebtedness as of 12/31/2025: \$921,639, consisting of State Trush Fund Loans, equipment loans and a capital lease

NOTICE OF SPECIAL TOWN MEETING  
OF THE ELECTORS OF THE TOWN OF CAMPBELL

Notice is hereby given that on Tuesday, November 17, 2025, immediately following the completion of the Public Hearing on the proposed 2020 budgets beginning at 6:00 p.m. at the Town Hall of Campbell, a Special Town Board Meeting of the electors, called pursuant to Section 60.12 (1)(c) of Wisconsin Statutes, by the town board will be held for the following purposes:

1. To adopt the 2025 Town tax levy to be paid in 2025 pursuant to Section 60.10(1)(a) of Wisconsin Statutes.
2. To approve the total year 2026 highway expenditures pursuant to Section 82.03(2) of Wisconsin Statutes.

SPECIAL TOWN BOARD MEETING

Immediately following the Town Meeting of Electors the Campbell Town Board will meet to:

1. To adopt the 2026 Town General Fund budget.
2. To adopt the 2026 Utility District #1 budget.

Dated this 31st day of October 2025

By: Dan Kapanke, Town Chairman  
Town of Campbell

**Attachment 5**

**PSC Incompleteness Determination**

Inserted on subsequent page(s).



# Public Service Commission of Wisconsin

Summer Strand, Chairperson  
 Kristy Nieto, Commissioner  
 Marcus Hawkins, Commissioner

4822 Madison Yards Way  
 P.O. Box 7854  
 Madison, WI 53707-7854

Public Service Commission of Wisconsin  
 RECEIVED: 10/29/2025 3:45:01 PM

October 29, 2025

Michelle Stahl, Clerk/Treasurer  
 Campbell Water Utility  
 2219 Bainbridge Street  
 La Crosse, WI 54603-1356

Re: Application of the Town of Campbell, as a Water Public  
 Utility, for Authority to Construct a New Water System, in  
 the Town of Campbell, La Crosse County, Wisconsin

935-CW-102

Dear Michelle Stahl:

On October 2, 2025, Campbell Water Utility (applicant) filed an application with the Public Service Commission of Wisconsin (Commission) for authority to construct a new water system, in the Town of Campbell, La Crosse County, Wisconsin. ([PSC REF#: 562393](#), [PSC REF#: 564463](#).) The application was filed pursuant to Wis. Stat. § 196.49 and Wis. Admin. Code § PSC 184.03, which require the Commission to determine whether a Certificate of Authority should be granted.

Commission staff reviewed the application to construct the facilities described above. Based on this review, the Commission has determined that the application is incomplete and, by this letter, notifies the applicant of this determination as required by Wis. Stat. § 196.49(5r)(c)1.

In Attachment A, Commission staff identifies the parts of the application determined to be incomplete and states the reasons for the determination. Wisconsin Stat. § 196.49(5r)(c)1. provides that an applicant may supplement and refile an application that the Commission deems incomplete. Until the applicant does so, Commission staff will place the application on hold and will not conduct further review.

If the applicant chooses to refile its application, please file a revised application or supplemental materials directly to the Commission's [Electronic Records Filing](#) (ERF) system under the docket number 935-CW-102 and using the document type "Application." Upon the applicant's refile, Commission staff will determine the application's completeness within 30 days pursuant to Wis. Stat. § 196.49(5r)(c)1. Please note that subsequent staff review may identify additional information or areas requiring clarification, and the Commission may determine that the application is still incomplete.

In order to receive notification of official correspondence (i.e. data requests, notices, final decisions, etc.), individuals must subscribe to the Utility ID or this PSC Docket. To subscribe, go to the Commission's [ERF](#) system. For help subscribing, go to [Subscribing to Dockets](#).

If you have any questions, please contact Gus Uribe at (608) 266-5726 or [Gustavo.Uribe@wisconsin.gov](mailto:Gustavo.Uribe@wisconsin.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'A.P. Galvin', followed by a horizontal line.

Andrew P. Galvin  
Administrator  
Division of Water Utility Regulation and Analysis

APG:GAU:rgs DL:02098822

Attachment A: Reasons for the Determination and Supplemental Questions

## Attachment A

### Reasons for the Determination

#### 1.1 (IV. General Project Description)

- a. The application fails to describe the project accurately. Well No. 1 has already been authorized and should not be included in the project description. A complete application would provide an updated project description that does not include Well No. 1.

#### 1.2 (V. Project Costs)

- a. The application fails to provide an accurate total project cost. A complete application would consider the following:
  - i. Well No. 1 has already been authorized and should not be included in the total project cost. A complete application would provide an updated project cost that does not include Well No. 1.
  - ii. Ensure that costs throughout the application are consistent with the total project cost. If not, provide an explanation of why. For example: Provide answers to the questions below:
    - a. The project cost on page 42 of the application does not match the total project cost. Please revise or provide an explanation of the cost differences.
    - b. The cost estimates on Attachment 8 PART B ([PSC REF#: 562549](#)) from pages 69 to 93, and the interest and operation & maintenance (O&M) cost from page 42 of the application, do not match the total cost project cost. Please revise or provide an explanation of the cost differences. Please do not include the cost of Well No. 1 in the new calculation.
  - iii. The total cost includes O&M cost for the first year. This item is not a construction cost and should not be included in the total project cost. Correct the cost accordingly.
  - iv. The \$374,000 sewer main cost should not be included because this is not a water asset, and it is not regulated nor recoverable by water rates. Correct the cost accordingly.
  - v. The Town of Campbell's (Town) share of the street construction costs should not be included in the total cost because it is not considered a water utility asset, and it is not regulated nor recoverable by water rates. Correct the cost accordingly.
- b. The application fails to allocate items correctly in the corresponding [PSC Uniform System of Accounts](#). Correct the allocations according to the bullets below:



- i. The applicant should allocate the raw water main from the wells in Account 316 (Supply Mains.)
- ii. The street costs are included in Account 341 (Structures and Improvements). This is not correct. The applicant should allocate its share of these costs to Accounts 343 (Distribution Main and Valves) and 348 (hydrants, laterals, and services).

1.3 (VII. Project Rate Impact)

- a. The application fails to provide an estimated water rate. At the August 25, 2025 meeting, Commission staff informed the applicant that it needed to provide estimated customer rates based on Commission rate-setting methodology with the construction application. Provide the water rate estimate accordingly.

1.4 (VIII. Project Funding Sources)

- a. The application fails to provide detailed information about the funding sources. Respond to the questions below:
  - i. The applicant listed connection charges of \$500 per Residential equivalent unit, for a total of \$840,500, as a funding source. During multiple meetings, Commission staff have explained to the applicant that the Commission has not allowed connection charges. Please provide an explanation regarding how the applicant would assess a connection charge. Explain how the applicant plans to cover this \$840,500 of project costs if it does not change connection charges.
  - ii. The applicant listed a \$8,540,000 United States Department of Agriculture Rural Development grant, two Environmental Protection Agency grants for a total of \$3,666,000, and \$5,100,000 in Safe Drinking Water Loan Program and Principal Forgiveness funds. Provide documentation to show that the applicant has been awarded all four of these grants.
  - iii. The applicant listed four loans. For each of the loans, provide when the applicant plans to close on the loan.
  - iv. For each of the loans listed, provide an estimated repayment schedule.

1.5 (IX. Environmental Impact Component of the Application)

- a. The application fails to include confirmation that the applicant has evaluated the impact of proposed construction, in particular the above ground storage tank, for impact to all Wisconsin Historic Preservation Database (WHPD) Architecture Historic Inventory (AHI) properties in the indirect (visual) area of potential effect (APE). If adverse visual effects would occur, identify and provide a description of all WHPD AHI properties with those facilities' indirect (visual) APE. For WHPD AHI

- properties within the indirect APE, determine the boundaries, historic significance, and integrity of each resource as they apply to Wis. Stat. s. 44.36(2).
- b. The application fails to provide an unanticipated archaeological discoveries plan. The plan should outline procedures to be followed in the event of an unanticipated discovery of archaeological resources or human remains during construction activities for the project.
  - c. The application fails to provide the methods the applicant will use for avoiding, minimizing, and mitigating construction impacts in and near waterways. This discussion should include, but not be limited to, how the applicant avoided waterways for the project scope and plans, installation methods (i.e., directional bore versus open-cut trenching or plowing), equipment crossing methods, sediment and erosion controls, invasive species protocols for equipment, etc.
  - d. The application fails to provide the location and size of any temporary staging and equipment storage for waterways that will be directionally bored.
  - e. The application fails provide a contingency plan for bore refusal and containment and clean-up of any inadvertent releases of drilling fluid (i.e., a frac-out) for waterways that will be directionally bored.
  - f. The application fails to verify if the applicant will follow and adhere to Wisconsin Department of Natural Resources (DNR) [Technical Standard 1072](#).
  - g. The application fails to provide details on how the project will cross and install assets across the various waterway crossings within the project area (i.e., Clinton St., Nakomis Ave., Kiowa Pl., Tellin Ct., etc.).
  - h. The application fails to make clear or provide details on whether the project scope will include any outfalls and/or riprap placed at or below the ordinary high-water mark of any waterways.
  - i. The application fails to verify whether the project scope includes any public or private road work.
  - j. The application fails to describe the method(s) used to identify wetland presence and boundaries within the project area (i.e., wetland field delineation, wetland field determination, conservative desktop review, etc.).
  - k. If conservative desktop review was the only method used to identify the presence of wetlands, state if any areas will be field verified (and when).
    - i. Note - program practice requires field verification for all areas of permanent fill.
  - l. The application fails to describe methods to be used for avoiding, minimizing, and mitigating construction impacts in and near wetlands. This discussion should include, but is not limited to, how the applicant avoided wetland impact for the project scope and plans, installation methods, sediment and erosion controls, invasive species protocols for equipment, etc.
  - m. The application fails to provide a single map set with the following displayed for each proposed and alternative site/route (if applicable) and their associated components. Each map set should include an overview or index page that includes page extents for

the corresponding smaller-scale map pages within the remainder of the map set. The smaller-scale map pages should show the project and resources in greater detail, include page numbers to reference the overview page, and have consistent scales throughout the pages.

- i. Most recent leaf off aerial image.
- ii. Wisconsin Wetland Inventory (“Mapped Wetlands” Surface Water Data Reviewer (SWDV) layer) and hydric soils (“Wetland Indicators & Soils” SWDV layer).
- iii. Wisconsin Surface Waters (“Surface Waters” SWDV layer).
- iv. Vehicle crossing method of waterways for both permanent and temporary access, labeled by the crossing method (i.e., use of existing bridge/culvert).
- v. Register of Waterbodies (ROW).
- vi. Locations of temporary and permanent structures.
- vii. Segment names and nodes.
- viii. Access paths (both on and off-ROW). Off-ROW access roads should be labeled with an identifying name or number.
- ix. Staging areas, laydowns, and any temporary workspaces, such as directional bore setup pads.
- x. Footprint of new facilities and/or footprint of existing facilities to be expanded, and associated driveways and permanent storm water management features to be built (ponds, swales, etc.).
- xi. Underground pipeline installation only: symbolize the line route to indicate installation method (directional bore, open-cut trench, plow etc.). This includes the excavation areas in wetlands (i.e., bore pits, open-cut trench, etc.).
- xii. Limits of disturbance (be sure to indicate if it varies across project activities – i.e., if certain sections will be located exclusively within impervious areas).
- n. The application fails to provide any documentation or correspondence from the DNR Remediation and Redevelopment (R&R) and/or Solid Waste Programs regarding the contaminated sites within the project areas.
- o. The application fails to provide additional details on the coordination or plan to coordinate with the DNR R&R and/or Solid Waste Programs regarding the contaminated sites within the project area.
- p. In regard to AFR section 3.9.2, specify depth and width of trenching required for watermain construction. If width and depth vary for various diameter watermains, provide the respective specifications for trenches to be dug for each diameter pipe.

### Supplemental Questions

1. Provide the total final cost of Well No. 1.
2. What is the current state of the La Crosse service agreement? Provide a copy of the terms of the agreement.

3. Attachment 7 for the water demand analysis is mentioned in Section E of the application “Supplemental Questions-Water Treatment Facilities.” This attachment is missing. Clarify if this is a typographical error or provide the attachment accordingly.
4. Clarify whether the sewer department will pay for the \$374,000 cost of sewer mains. If not, will the applicant contribute \$374,000 to the sewer department to cover this cost? Please explain how the parties determined the cost responsibility.
5. If the \$14,849,272 in Account 341, Part V, is street reconstruction and the \$7,260,000 in Part VII is the Town portion of street reconstruction, it appears the applicant will be responsible for half the cost of street reconstruction. How did the applicant determine this cost share? Did the applicant consult the DNR [Street Reconstruction Cost Policy](#) during the determination?
6. The applicant estimated the costs for plant located on Hiawatha Island separately in Attachment 8 PART B ([PSC REF#: 562549](#), pages 91-92.) at \$1,738,500, plus \$604,250 in street repairs, for a total of \$2,342,750. What portion of the total street repairs will the applicant be responsible for? Explain how the applicant determined this cost share and clarify if it included the DNR policy during the process.
7. Water utilities generally extend service to new customers by having the customers pay for the water mains. Explain why the applicant did not levy special assessments for the water mains.
8. Standard water utility rates and rules include Schedule Cz-1, which establishes a Water Lateral Installation Charge that requires that the customer pay the actual cost of installing a water service lateral from the main through curb stop and box. Explain why the applicant is not applying this standard rate.
9. The applicant did not complete the supplemental questions in Section F of the application “Supplemental Questions – Utility Buildings.” Please only answer questions nos. 1, 2, and 6.
10. Since the applicant is establishing rates for the first time for this water system, supply the information requested in Section B “Supplemental Questions – Establish New Utility.”
  - a. Item Nos. 4 – 11
  - b. Item Nos. 15 and 16
  - c. Item No. 18
11. In Table 2.7 of the engineering report that the applicant submitted as part of Attachment 8 PART A ([PSC REF#: 562548](#), page 26), the applicant estimated 132 Multifamily customers. Provide a grouping of these customers by number of units in the building such as 50 eight-unit buildings, 50 twelve-unit buildings, and 32 twenty-unit buildings.
12. Does the applicant plan to have a municipal public fire protection (PFP) charge or direct PFP charges? An overview of PFP charges can be found here: [PSC Public Fire Protection](#).
13. In Part VII of application, the applicant estimated annual operating expenses of \$396,000, which appears low. Please answer the following questions:
  - a. As instructed in Section B “Supplemental Questions – Establish New Utility”, the estimated costs should be for the third year of operations.
  - b. Based on the PSC Annual Reports, similar sized water utilities in Wisconsin reported an average of \$550,000 in operating expenses in 2024. If this is increased by inflation, it would be about \$625,000 in 2029. Provide an adjusted estimate.
  - c. The applicant did not estimate any labor in Account 600-906. Provide an estimate accordingly.

- d. The applicant did not estimate any expenses in the Transmission and Distribution category or the Customer Accounts category. Provide an estimate accordingly.
  - e. Provide the individual mill rates and the assessment ratio from the most recent tax bills.
  - f. Does the Town plan to charge the maximum payment in lieu of taxes expense to the applicant? If not, what amount does the Town plan to charge?
14. Does the applicant plan to request the benchmark rate of return (ROR), currently 6.70 percent, in the rate case to set initial rates? If not, what ROR does the applicant plan to request?
15. Provide the estimated timeline for incorporation of the Town to the Village of French Island.
16. Is the applicant requesting approval for the construction of a third well, Well No. 3 in this docket? If so, provide the location of Well No. 3 and the associated environmental impacts.
17. The application states "Phase 2B will consist of the construction of the Pumphouse/Treatment No. 1 and Well No. 2." Does numbering the pumphouse/treatment "No. 1" indicate that there may be a second pumphouse/treatment for Well No. 2?
18. Section IV (3) of the application lists "well site sewer upgrades." Clarify if this refers only to construction connecting the pumphouse restroom to the existing sewer system. Clarify if this docket includes other additions to the existing sanitary sewer system. If it does, provide the environmental impacts associated with those activities.
19. The 2025 Phase I archeological survey includes reference to "a possible easement across two residential lots for the loop on Bayshore Drive," "The relocated Marina Drive," and "The riverbank at Hinkley Road extended for the alternate river crossing." ([PSC REF#: 562552](#), page 30.) Clarify if these activities should be considered for approval in this docket.
20. Confirm whether construction in the area described as "a possible easement across two residential lots for the loop on Bayshore Drive" will impact or occur within the boundaries of archaeological site LC-0017. Provide details about the depth of the pipe and location of bore pits for construction in this general area to determine whether an archaeological monitor would be required at that location.
21. Confirm if the applicant would obtain a permit from the WI Historical Society before any construction impacting archeological and burial site 47LC476/BLC-0126 (Area 5).
22. State whether the applicant plans to utilize an archaeological monitor during construction in areas identified as areas of high archeological potential and described as Areas A, B, and C on pages 11-12 of the September 2000 Land Use History Report by M.V.A.C.



## **Attachment 6**

### **Trilogy Consulting, LLC Report**

Attachment 6 is not included in the initial submission of Part 2. Attachment 6 will be provided at a later date.



TO: City of La Crosse

FROM: Trilogy Consulting, LLC

DATE: December 1, 2025

RE: Proposal to construct a municipal water supply and distribution system in the Town of Campbell

### **Introduction**

The City of La Crosse retained Trilogy Consulting to work with City staff to review the financial implications of the proposed Town of Campbell water supply and distribution system in relation to its petition for incorporation. This memo summarizes our review and findings.

Our analysis evaluated the revenue requirements and customer charges for a potential Town of Campbell water utility using standard ratemaking practices used by the Public Service Commission of Wisconsin (PSC). It also evaluated the potential revenue sources, other than user charges, that the Town claims will provide funding for the water system.

Revenue requirements and customer charges were evaluated based on three alternative cost estimates and funding plans:

1. Engineering and operation and maintenance cost estimates and estimates of grant funding provided by the Town's engineering consultant, Davy Engineering.
2. Engineering and operation and maintenance cost estimates provided by the City's engineering consultant, Donohue & Associates, with assumptions about grant funding used by the Town's engineering consultant, Davy Engineering.
3. Engineering and operation and maintenance cost estimates provided by the City's engineering consultant, Donohue & Associates, with assumptions about grant funding provided by the Town's engineering consultant, Davy Engineering reduced by half.

### **Current Water Service**

The Town of Campbell does not currently have a municipal water supply. Most properties are served by private water wells. The vast majority of these wells are shallow, drawing from the sand/gravel aquifer. Since 2020, it was discovered that many private residential wells that were sampled detected some level of PFAS. This is the catalyst for the Town exploring the creation of a Town-wide municipal water utility and water supply and distribution infrastructure.

Additionally, no new wells are being drilled on the entirety of French Island, where Campbell is located.

Municipal water service is provided by the City of La Crosse on French Island, to areas of the island that are in the City, primarily the airport and nearby industrial park. The City also provides water service to residential properties on Hiawatha Island that are located in the City. Adjacent Hiawatha Island properties located in the Town do not currently have municipal water service. The City abandoned three wells on French Island, and City customers on the islands are connected to the City's distribution system and are served by the City wells located on the mainland.

### **Standard PSC Ratemaking Practices**

The PSC uses a utility basis method to establish water rates. Under this method, the amount of revenue that a utility is required to collect include operation and maintenance expenses, taxes (which primarily consist of a Payment in Lieu of Taxes, or PILOT, to the municipal general fund), depreciation expense, and a return on investment.

The return on investment is calculated by applying a standard or benchmark rate of return to the utility's investment in utility financed plant assets. Utility financed plant includes any assets that are paid for through user charges. Assets that are contributed by developers or paid for with grants, special assessments, impact fees, or similar contributions from customers are excluded from utility financed plant, and utilities are not allowed to recover depreciation expense or a return on investment on utility assets funded with these sources.

Together, the depreciation expense and return on investment that PSC allows utilities to recover through rates are used to cover debt service and routine reinvestment in water systems to replace or rehabilitate utility infrastructure. The PSC does not typically allow utilities to set customer rates to recover more or less than the benchmark rate of return.

After PSC establishes the revenue requirements for a utility, a detailed cost of service study is prepared to identify the costs associated with providing average daily, maximum day, maximum hour, storage, public fire protection, metering and billing, and services costs. These costs are then allocated to each customer class in proportion to the classes' use of water system services. Finally, the proposed rates are developed based on the allocated costs and the projected water sales and number of customers by meter size.

As described below, the reports provided by the Town's engineering consultant did not provide any estimates of customer rates using PSC ratemaking practices or even all the information that would be needed to develop estimates of customer rates. Trilogy Consulting and Donohue & Associates developed estimates for the missing information based on available information, as described below.

### **Davy Engineering Proposed Water System Study**

In July 2024, the Town had a preliminary engineering report for a water system prepared by Davy Engineering. This study conducted an alternatives analysis for creation of a municipal water supply for the Town, prepared assumptions of water use and ultimately recommended that the Town create its own water supply and distribution system. This report was amended in July 2025 and included in the appendices that were submitted to the Public Service Commission as part of its Construction Authorization (CA) application for the proposed water system (referred to in this memo as the updated report).

In 2023, the Town completed a test well located in Wardwell Park, which is also the location of a permanent well. The Town proposes to build a pumphouse and treatment facility on the same site. Based on the test well, a Town water supply would require treatment of groundwater to reduce Radium (at levels almost double the maximum contaminant level (MCL)) Iron, and Manganese.

In addition to the water supply and treatment facilities, a Town water system would also require the construction of water storage facilities, and a water distribution system that would serve all Town properties. Currently, the Town does own a limited amount of water mains, but has no customers connected to them. The current cumulative length of main that the Town owns is 10,461 feet, consisting of 6-inch, 8-inch, and 12-inch diameter mains. As a part of the recommendation, the report proposes to construct a water main on Hiawatha Islands that would parallel an existing La Crosse main that serves City properties.

To estimate the water demand for the Town of Campbell, the report used available reported information from the City of Onalaska as a proxy, as well as existing sewer use data for Town of Campbell users. The estimated peak demand was determined to be 1.4 million gallons in one day, based on a peak per capita demand of 300 gallons per day, and the Town's design population of 4,405. If the USGS Upper Midwest Environmental Services Center connects to the system for domestic water use only, the peak demand would rise to 1.42 MGD. To provide peak hourly demand including fire protection, the preliminary engineering report estimated that the system

would need two wells that could pump a combined 3,000 gallons per minute, plus water storage capacity of 700,000 gallons. An elevated tank was recommended to provide adequate storage.

### *Alternatives Analysis*

The preliminary engineering report described three alternatives for consideration: an independent water system, a “joint” water system with La Crosse, and a “joint” water system with Onalaska. The La Crosse alternative was dismissed because the Town claims that the City will not agree to serve Town customers without annexation. Of the remaining two alternatives, the independent system was recommended, as it is estimated to cost less both to construct and to operate.

The revised construction cost estimate of the independent system is \$64,775,500, based on the CA application, with an annual cost to operate and maintain the system of \$396,000, as stated in the updated report and the CA application. About 72 percent of the total construction cost consists of the distribution system, including water meters and street reconstruction that would be required as part of the main installation. It does not include costs for private service laterals that are needed to connect buildings to the water main. Those costs would be borne directly by the connecting customer, and the report estimates that an average residential water service would cost \$7,500. The details behind the estimates were not provided in the preliminary engineering report.

### *Funding Sources*

The preliminary engineering report explored options for loan and grant programs that may be used to finance the construction of the water system, revenues that may be available to repay the debt service and fund operation and maintenance expenses, as well as estimates of the end cost to the customer. While the report does not recommend a specific financing plan, it does explore example plans that could be used in whole or in part.

Potential financing sources include a Safe Drinking Water Fund (SDWF) loan, principal forgiveness from the SDWF Emerging Contaminants program, an EPA Community grant secured by the Town, and a grant to the Town included in an Interior Appropriation Bill. The report claimed that the Town could be eligible for a Rural Development (RD) loan and a RD grant of up to 43% of project costs, although the availability of this level of funding would depend on using unused funds in other states’ Rural Development programs.



To repay the debt service, one option noted was to use special assessments to pay for supply and storage construction costs. Assessments of \$65 per linear foot and 192,500 assessable street frontage would generate about \$12.5 million in assessment revenue, to be paid in installments by the benefiting customer. A residential lot with 100 feet of street frontage would be assessed \$6,500 under this option. However, more recent documents, including the updated report and the CA application, indicate that the Town is not intending to use special assessments as a source of funding. However, any proposed connection charge as discussed below would have to be implemented as a special assessment.

Another source of revenue that the reports explored is a connection charge that would be intended to recover the cost of the utility's service lateral and the water meter. In the preliminary engineering report, a connection charge of \$2,725 was proposed for a 1" service and 5/8" meter, which would serve most properties in the Town. In total, the report estimated that about \$4.77 million could be generated through connection charges. It did not provide the legal authority for implementing such a charge; this is discussed further in the next section. However, the updated report states that the Town would prefer a lower connection charge of only \$500 per Equivalent Dwelling Unit (EDU), which would only generate \$840,500, should the proposed charge pass legal scrutiny.

Two example financing plans were provided in the preliminary engineering report. A revised cost estimate and financing plan were provided in the updated report. There are several cost estimate differences from the June 2024 report to the July 2025 report, but most of the reduction in costs was due to a reduction in engineering costs. From the detailed construction cost estimates contained in the appendices, construction cost estimates were reduced by about \$1.9 million and engineering, legal, and contingencies were reduced by about \$4.3 million. It is unclear why engineering costs were reduced so much more than the construction cost estimates.

The total estimated costs and the balance that would be financed by the utility and included in user charge rates under the various cost estimates and financing plans provided by the Town's engineering consultant are summarized in the following table.

	Ex. Financing Plan A (July 2024 Report)	Ex. Financing Plan B (July 2024 Report)	Ex. Financing Plan (June 2025)

			Updated Report) <sup>1</sup>
Total cost with construction interest	\$72,703,050	\$72,703,050	\$63,850,400
Grants	\$7,100,000	\$36,873,630	\$18,200,000
Connection charges	\$4,768,000	\$4,768,000	\$840,500
General fund portion of Streets			\$7,260,000
Sewer portion of Meters			\$630,500
Balance of Utility Financed Plant	\$60,835,050	\$31,061,420	\$36,919,400

These example financing plans do not include any deposits to utility operating reserve funds. Utilities should maintain reserves for numerous reasons, including fluctuations in revenues and expenses, unexpected capital needs, and ensuring funds are available to pay debt service. Campbell does not currently have any water utility reserves, so the above plans should include an annual deposit to establish and maintain some level of reserves, which would result in higher monthly costs than shown.

In addition, as explained in the following section, the method used to estimate water use charges in the preliminary engineering report and the updated report do not follow standard ratemaking practices used by the Wisconsin Public Service Commission.

#### *Trilogy Analysis of the Cost Structure and Potential User Rates*

After reviewing the Davy Engineering report and other documentation related to the proposed water system, Trilogy prepared a cost-of-service analysis that mirrors traditional ratemaking methods of the Public Service Commission, which would ultimately set the water user rates for any new utility. The purpose was to evaluate the assumptions used in the original Davy report, the updated report, and the CA application and determine the reasonableness of the conclusions regarding future customer bills.

#### *Assumptions Used for the Rate Analysis*

Most of the assumptions used were the same as contained in the Davy report, as updated and included in the CA application, which contains the most recent cost estimates. Certain

<sup>1</sup> Note: Figures for total construction cost and amount of grant funding do not match those submitted with the Construction Authorization application in PSC Docket 935-CW-102.

assumptions were changed based on standard PSC policies and practices. Changes are explained below.

- O&M Expenses
  - The O&M expenses used in the analysis are identical to those estimated in the Davy report, of \$396,000 per year.
- Construction Cost
  - The total cost used in the analysis was based on the detailed cost estimates found in the appendices of the updated report. This amounted to \$56,885,000, and was placed into the various standard PSC accounts, based on the CA application. This amount excludes the portions of construction that would be paid by non-utility entities (General Fund, Sewer). Any actual plant constructed would be recorded based on detailed construction records.
- Basis for Rate Estimating
  - The preliminary engineering report and updated report used an estimated amount of debt service plus O&M expenses to estimate annual cost to the average end user. However, standard PSC ratemaking uses the utility basis for setting rates, which does not factor in annual debt service. Instead, depreciation and an annual return on investment (ROI) on net investment rate base are used to determine the amount of revenues that should be generated to pay for capital improvement needs. No depreciation expense or return on investment may be recovered for contributed assets, meaning any construction that is funded through special assessments, grants or principal forgiveness, any type of connection fee, or any other type of contribution would not be eligible for rate recovery and would not be included in the analysis of rates. The assumptions used in the Trilogy analysis include the following:
    - \$0 in contributions through special assessments. If the Town imposed special assessments for any costs, no depreciation or ROI would be collected through rates for that portion of the water system.
    - \$17,306,000 in contributions through various grants. In the CA application, it is claimed that three different programs could provide grant funding for a total of the above amount. This amount was assumed to be contributed to all assets, except for mains, services, and meters, meaning it would also be excluded from depreciation or ROI for purposes of rate setting. However, the amount of potential federal or state grant funds is uncertain

and the Town has not provided any documentation that it has been awarded any grants as part of its CA application. Should any portion of this presumed grant funding not be available, rates would need to be increased proportionately.

- The CA application assumed \$840,500 would be collected through connection charges. However, the legal basis cited for the authority to charge such a fee to new connections in the preliminary engineering report was the special assessment statute. PSC policy generally has been that any fees related to water utility service that is not otherwise authorized through Wisconsin statutes is a rate and can only be authorized by the PSC. As such, connection fees for water utilities are generally seen as illegal and cannot be utilized for water utility purposes. Any fee would need to be implemented through other legal means, such as special assessments or impact fees. Additionally, the preliminary engineering report based the amount of the connection fees on the cost of the service lateral and meter for each connection to the system. Assessing properties for the cost of meters and utility-side service laterals (which would then be recorded as contributed assets) is highly unusual in Wisconsin. It is very rare for a Class C utility (which would apply to the Town of Campbell) to have any meters recorded as contributed, and any service contributions usually occur when entire subdivisions are built and all basic infrastructure is paid for by developers. However, the base Trilogy analysis assumes that these “connection fees” will be allowed, and that \$850,400 of services and lateral construction will be contributed, with the remaining costs for services and lateral construction utility-financed and recovered through user rates.
- The current benchmark rate of return on net investment rate base for purposes of determining the amount of ROI to include in rates is 6.70 percent. This was used in the Trilogy analysis, but any rate would be determined by the current benchmark at the time of establishing rates.
- Payment in Lieu of Taxes
  - The preliminary engineering report and updated report do not address the potential for the Town of Campbell to collect a payment in lieu of taxes (PILOT) on water utility property. Most utilities in the state make a PILOT to the general fund of the owning municipality, based on standard methodology utilized by the PSC.

Municipalities can choose to collect any amount up to the maximum calculated, or nothing at all. Since the Town's engineering reports do not address this, the Trilogy analysis assumes that there will be no PILOT on water utility assets.

- Water Demand and Sales
  - Based on information from the engineering reports, it was assumed that there would be 1,692 customers. Of these, 1,507 would be classified as residential, 132 multi-family, 45 commercial, 1 industrial, and 7 public authority. In total, there would be 1,616 5/8" meters, 45 1" meters, 27 1.5" meters, and 4 3" meters.
  - Neither the preliminary or updated engineering reports attempted to project actual billed water sales, only total annual pumpage projected for purposes of the design of the water system. It is necessary to have an estimate of billed water sales to develop appropriate rates per unit of water sales. In consultation with Donohue & Associates, the Trilogy analysis is based on total estimated annual water sales of 152,245,000 gallons.
  - It was also assumed that since there is no historical data on which to design a rate structure, that all volumetric water rates would be a uniform rate charged to all customer classes, with a single tier for all usage.

#### *Summary Results of the Rate Analysis*

The analysis of the revenue required for the proposed Campbell Water Utility based on the cost estimates contained in the Town's engineering reports includes \$396,000 of O&M expenses, \$974,748 of annual depreciation expense, and \$2,603,030 in ROI, for a total of \$3,973,778. This is the amount that is expected to be included in the rates that will be charged to the assumed number of customers, both residential and non-residential. Using standard cost of service principles and ratemaking methodology used by PSC, this would result in a monthly service charge of \$24.60 for a 5/8" meter, a monthly public fire protection charge of \$56.80 for a 5/8" meter, and a user rate of \$14.42 per 1,000 gallons of water used. For an average residential customer that uses 4,560 gallons of water per month (based on the average residential customer from the Donohue analysis), this results in a monthly bill of \$152.76, or \$1,833.06 per year. This is in addition to the initial cost to connect the customer to the water system, consisting of the Davy-estimated private-side lateral cost of an average of \$7,500 and the connection charge of \$500. This all is in addition to a higher property tax bill that will be needed for all properties in the Town from taking on a portion of street reconstruction. This cost would be even higher if less grant money is awarded to the Town, or if annual O&M expenses are higher than initial estimates.

Noteworthy is that the Public Service Commission of Wisconsin estimated that water rates could result in customer bills as high as \$302 per month, or about \$3,624 per year, if no grant is received and the full water system is implemented. This estimate was also based on standard PSC ratemaking procedures using a utility basis for setting rates, with recovery of O&M expenses, depreciation, taxes, and rate of return on rate base.<sup>2</sup> This estimate has not been verified as PSC assumptions are unknown (e.g. the inclusion of a tax equivalent payment), but it confirms that standard PSC rate making principles would result in a significantly higher user rate and customer bill than is projected in the Town's engineering reports.

### **Donohue & Associates Report**

The City asked its engineering consultant, Donohue & Associates, to review the Town's water system plans and estimates and provide an independent cost estimate. The Donohue analysis determined that the Town's estimate of O&M expenses is too low.. The Donohue analysis also provides several areas where the Town under-estimated the capital construction costs of the proposed water utility.

- O&M Expenses
  - The revised estimate of O&M expenses that Donohue provided totaled to \$598,973, just over \$200,000 higher than the Town's estimate. The significant areas where O&M expenses were under-estimated according to the Donohue report were in:
    - Pumping expenses, specifically operating labor and energy costs, with an increase of about \$90,000;
    - Water treatment expenses with an increase of about \$143,000, including operation labor, chemicals, and maintenance of plant equipment;
    - Transmission and distribution expenses of about \$80,000, most of which is maintenance of the water mains. Davy had estimated that there would be zero cost under this category.
    - Customer accounts expense of \$30,000 for meter reading labor. Again, Davy estimated zero costs for this category of expenses.
  - Additionally, the Donohue report estimated a smaller amount of expenses for general and administrative expenses of about \$138,000. Despite this, their

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<sup>2</sup> PSC Incompleteness Determination letter, dated August 22, 2024, Supplemental Question 2, PSC REF#: 514837



independent cost estimate was over \$200,000 higher than the original Davy estimate.

- Construction Costs
  - Donohue estimated that a more realistic cost of the construction of the proposed water utility was \$70,297,005. The categories of construction that differed significantly consisted of capital assets within the distribution system, including mains, services, and hydrants. Other categories of costs were adjusted up or down according to the Donohue estimates.
  - This estimate included only 20% of street reconstruction costs can be included in the water utility costs, per DNR rules. This means that the amount of street reconstruction that would have to be borne by either the general fund or the sewer utility will be higher than the original Davy estimates by \$4,455,000
- Basis for Rate Estimating
  - The same assumptions regarding grant funding and other fees and funding sources that offset the costs that go into water rates were used in the analysis using Donohue's cost estimates. The same rate of return on investment of 6.7% was used to estimate rates, although it is applied to a higher rate base, as described above.
- Payment in Lieu of Taxes
  - Again, it was assumed that the proposed water utility would not make a payment in lieu of Taxes to the municipality.
- Water Demand and Sales
  - There was no adjustment to water demand and sales under this analysis, as the same assumptions were used to evaluate the water rates using the Davy operating and capital cost estimates.

#### *Summary Results of the Rate Analysis*

The impact of this higher cost, even if the Town were to receive \$17.3 million in grant funding, is significant. The analysis of the revenue required for the proposed Campbell Water Utility based on the cost estimates contained in Donohue's report includes \$598,973 of O&M expenses, \$999,533 of annual depreciation expense, and \$3,501,634 in ROI, for a total of \$5,100,139. This is the amount that is expected to be included in the rates that will be charged to the assumed number of customers, both residential and non-residential. Using standard cost of service principles and ratemaking methodology used by PSC, our analysis shows that Donohue's estimates of O&M expense and capital costs would result in an average customer using 4,560

gallons of water per month paying \$194.40 per month or \$2,332.82 per year for water service from the proposed Town water utility. This is comprised of fixed charges of \$101.50 per month in fixed charges and \$18.86 per 1,000 gallons in water consumed. In this case, the fixed charge alone would make the proposed Town water utility the most expensive Class C utility in the state, before adding any cost for water consumption.

### **Donohue Report Cost Estimates with Reduced Grant Funding**

For this analysis, the assumptions for O&M expenses, capital costs, the rate determination methodology, and water sales were the same as was used to estimate rates under the Donohue analysis. The only change made in this analysis was to test the impact of the Town not receiving the full amount of grant funding and principal forgiveness that it has stated it expects to receive. Based on all documentation reviewed to date, no document has been filed either with PSC or IRB that shows that the Town has in fact received such funding. This lack of documentation was noted as a deficiency by the PSC in its incompleteness determination letter regarding the Town's application for authorization to construct a water system.

If the Town does not receive the full amount of grant funding it is assuming, then the impacts to customer rates would be even greater. If even half of the amount of grants of \$17.3 million are not realized for the proposed system, then the impact on customers would be an increase of over 15 percent more than the analysis using the Donohue estimates. Under this scenario, an average Town customer would pay \$225.46 per month for water service, or over \$2,700 per year. This is comprised of fixed charges of \$117.00 per month and \$22.25 per 1,000 gallons of water consumed. This is in addition to any increase in both sewer rates and property taxes that would need to be implemented to cause this water utility to come to fruition.

### **Conclusions**

1. An analysis of user rates, using the assumptions contained in the Davy reports and the CA application and standard PSC ratemaking practices, results in significantly higher user charges and customer bills than estimated in the Davy reports.
2. The assumptions regarding capital costs may be unreasonable, based on an independent analysis from Donohue & Associates. Any increases in capital costs, whether through underestimation of capital costs or inability to procure all grant funding will increase the cost to proposed utility customers.

3. The assumptions used for estimated water sales and annual O&M expenses may be unreasonable, based on an independent analysis from Donohue & Associates, an engineering firm.
4. The user rates for a proposed Town of Campbell water utility under any of the scenarios described above would be some of, if not the, highest in the state, using the quarterly water bill comparison tool on the PSC's website.<sup>3</sup>

The following table summarizes the resulting rates under each analysis and the monthly and annual cost to customers of the proposed water utility, using standard PSC ratemaking principles and PSC financial benchmarks.

	Scenario 1 - Davy Estimates	Scenario 2 - Donohue Estimates	Scenario 3 – Less Grant Funding
Total Costs included in Water Rates	\$3,973,778	\$5,100,139	\$5,955,788
Monthly Fixed Charges	\$81.40	\$101.50	\$117.00
Consumption Charges per 1,000 gallons	\$14.42	\$18.86	\$22.25
Average Residential Customer Monthly Use	4,560 Gallons	4,560 Gallons	4,560 Gallons
Average Monthly Water Bill	\$152.76	\$194.40	\$225.46
Average Annual Water Bill	\$1,833.06	\$2,332.82	\$2,705.52

<sup>3</sup> PSC Quarterly Water Bill Comparison: <https://apps.psc.wi.gov/RATES/waterbill/default.aspx>

**Attachment 7**

**Donahue & Associates, Inc. Report**

Inserted on subsequent page(s).

Technical Memorandum

# Campbell Water System Engineering Review

City of La Crosse, WI



Date: November 21, 2025  
To: City of La Crosse, WI  
From: Donohue & Associates, Inc.

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## Project Background and Summary

On October 1, the Town of Campbell submitted to the Wisconsin Department of Administration its Petition for Incorporation as the Village of French Island. The proposed area of incorporation encompasses the entire existing Town of Campbell. As part of the proposed incorporation, significant changes to the existing Campbell Water Utility are planned.

At present, the Campbell Water Utility operates only a partial distribution system that the City of La Crosse supplies with water. The proposed improvements would create an independent water system fully separated from the City of La Crosse, consisting of:

- Two to three production wells
- A pumphouse and water treatment plant for radium, manganese, and iron removal
- Approximately 123,000 feet of new water main and associated appurtenances
- A 700,000-gallon elevated storage tank

A map of the proposed water system is found in Appendix 1.

Wastewater from the Town's collection system would continue to be conveyed to the City of La Crosse Wastewater Treatment Facility (WWTF).

The City of La Crosse has filed a resolution expressing opposition to incorporation and signaling intent to annex the Town of Campbell.

Donohue was retained to provide an engineering review of the proposed improvements as presented in:

- Public Service Commission (PSC) Docket 935-CW-101 (Well No. 1)
- PSC Docket 935-CW-102 (Campbell Water System)
- Incorporation submittal posted at the Town of Campbell website
- Preliminary Engineering Report (PER) that is included in PSC Docket 935-CW-102

Additional publicly available data—PSC annual reports, Wisconsin Department of Natural Resources (WDNR) public water system data and well construction reports—were also reviewed.

This memorandum examines several areas of the proposed Campbell Water System development:

1. Proposed water system demand.
2. Sizing of supply, treatment and storage components.
3. Water treatment requirements including equipment sizing, selected process and waste generation and disposal.
4. Capital and operation and maintenance cost estimates for independent Campbell system
5. Identification of facilities in the independent Campbell system that are unnecessary if City of La Crosse supplies water to system.
6. Discharge of radium from independent Campbell system to City of La Crosse Wastewater Treatment Facility.

## Proposed Water System Demand

### Review of Campbell-Submitted Demand Estimates

The Preliminary Engineering Report (PER) submitted for the proposed Campbell Water Utility establishes projected system demands using outdated Department of Administration (DOA) population projections (2019) and demand factors sourced from the City of Onalaska. The approach applied in the PER does not follow the methodologies typically used for municipal water system planning in the United States. Standard practice is to base demand forecasts on per-capita residential consumption and established water-use characteristics for land uses classes anticipated for the specific area. The PER does not incorporate current (2024) DOA population forecasts, nor does it use land-use-based water-use multipliers or locally verified user type data for the Town of Campbell. These inconsistencies affect the reliability of the average day, maximum day and peak-hour demand projections used throughout the submitted design documentation.

### Updated Demand Estimate (Donohue Analysis)

To develop a more accurate and defensible estimate of future water system demands, Donohue prepared an updated set of demand projections. The updated analysis incorporates the 2024 Wisconsin Department of Administration (DOA) population projections for the Town of Campbell<sup>1</sup>, existing unit counts and backup Equivalent Dwelling Unit (EDU) data from the Campbell PER and verified consumption data from the City of La Crosse Water Utility based on demand type.

A summary table has been developed to present the updated average day, maximum day, and peak hour demand estimates alongside the values reported in the PER. The table also shows the calculated demands under each of the two methodologies (consumption by user class and generic per-acre rates) and identifies the assumptions used in each calculation. These updated projections indicate that the PER's demand estimates vary significantly from values generated using current data and standard forecasting procedures. Maximum-day projections recalculated are more aligned with expected conditions.

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<sup>1</sup> Available online at [https://doa.wi.gov/Pages/LocalGovtsGrants/Population\\_Projections.aspx](https://doa.wi.gov/Pages/LocalGovtsGrants/Population_Projections.aspx)



Item	PER Report Values	Revised Values – Using Land Use Demands Per Unit			Revised Values – Using Land Use Demands Per Acre		
		Units <sup>4</sup>	GPD/unit <sup>1,2</sup>	Total	Acres <sup>3</sup>	GPD/acre <sup>2</sup>	Total
Population	4,405	4,156			4,156		
Residential		1507	150	226,050	603	500	301,500
Commercial		45	960	43,200	190	750	142,500
Industrial <sup>5</sup>		1	500	500	1	1,500	1,500
Public Authority <sup>6</sup>		7	4080	28,560			
Multifamily Residential		132	900	118,800			
Peak Day gpcpd	300	251			268		
Average Day gpcpd	120	101			108		
Peak Day, gallons	1,400,000	1,043,000			1,113,750		
Total Annual, gallons	194,000,000	152,382,300			162,718,875		
Average Day, gallons	530,000	417,200			445,500		

<sup>1</sup>Used La Crosse 2024 WEGS Data on Usage Per User Type.

<sup>2</sup>327 IAC Breakdown GPD Estimates Used in supplement.

<sup>3</sup>Taken from Town of Campbell 2021-2040 Comprehensive Plan.

<sup>4</sup>Parcel type derived from both PER and Town of Campbell Comprehensive Plan.

<sup>5</sup>PER cited 2 EDUs for this one industrial parcel. Using PER data, each EDU is about 231. Rounded up to 250 GPD/EDU for unit calculation.

<sup>6</sup>School with 350 students used IAC 327 at 25 GPD/pupil. Remaining units used PER EDU Information and La Crosse WEGS Data.

Using locally derived consumption rates for each land-use category based on metering data from comparable customer classes within La Crosse, the anticipated demand for the Town of Campbell is approximately 20% less than that described in the PER.

### Comparison Summary

The updated demand projections prepared by Donohue differ notably from the values presented in the PER. When current (2024) DOA population projections and land-use-based consumption data derived from La Crosse Water Utility metering records are applied, the resulting system-wide average-day and peak-day demands are lower than the PER estimates.

## Sizing of Supply, Treatment, and Storage Components

### Source of Supply – Wells

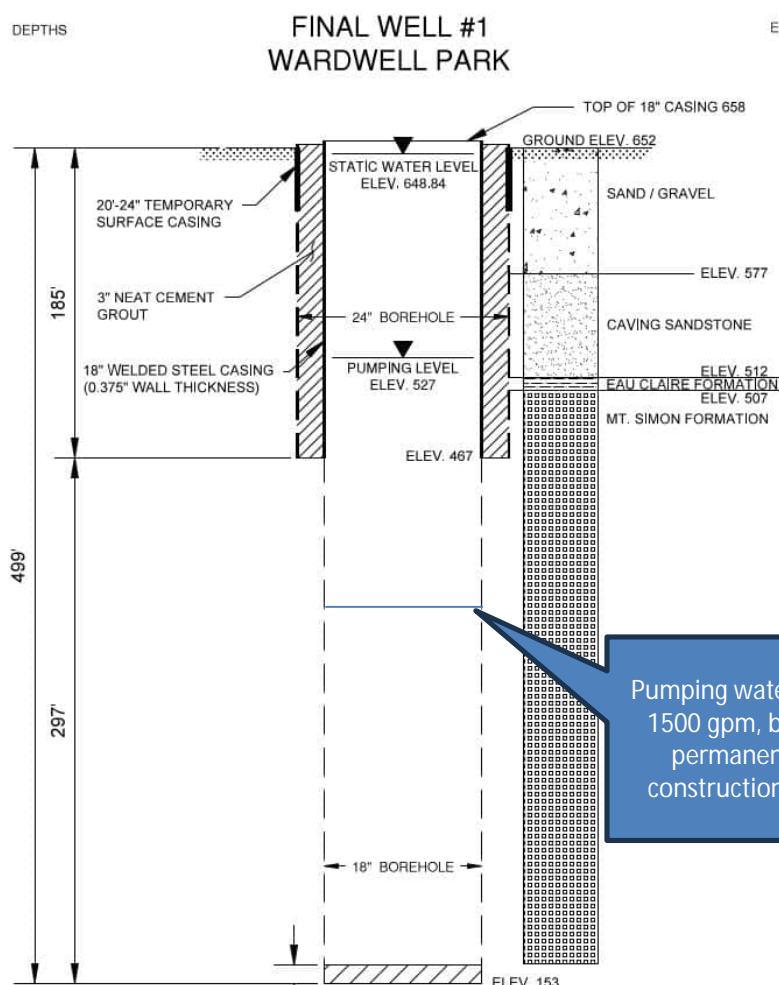
The PER proposes two production wells, each assumed to produce 1,500 gpm from the sandstone aquifer. The 1,500 gpm capacity is reported at the peak hour in the PER and is consistent with previous analysis of water service for the Town of Campbell.<sup>2</sup> Two 1,500 gpm wells is consistent with *Wisconsin Administrative Code* §NR 811.26 which requires that water systems have two or more pumping units, with each unit

<sup>2</sup> Technical Memorandum: Town of Campbell System Evaluation, AECOM, April 9, 2024.

capable of supplying the peak demand. Similarly, *Recommended Standards for Water Works*<sup>3</sup> (10 States Standards) states that the total groundwater source capacity, unless otherwise specified by the reviewing authority, shall equal or exceed the design maximum day demand with the largest producing well out of service.

Test well data included in the PER, however, indicates that the aquifer may not be capable of sustaining this level of production. The permanent well construction report indicates a pumping water level of 220 feet below grade at 1,500 gpm<sup>4</sup>, which raises significant concerns regarding long-term well performance and aquifer stability. At this pumping water level, the well pump bowls and intake will need to extend below the well casing, which is less than ideal in a sandstone bedrock well due to the potential for sloughing of the formation or sand production.

Another concern with the well site is the lack of a continuous impermeable geologic formation to protect the sandstone aquifer from contamination by per- and polyfluoroalkyl compounds (PFAS). The PER indicates that the only barrier to downward migration of PFAS is the low-permeability Eau Claire

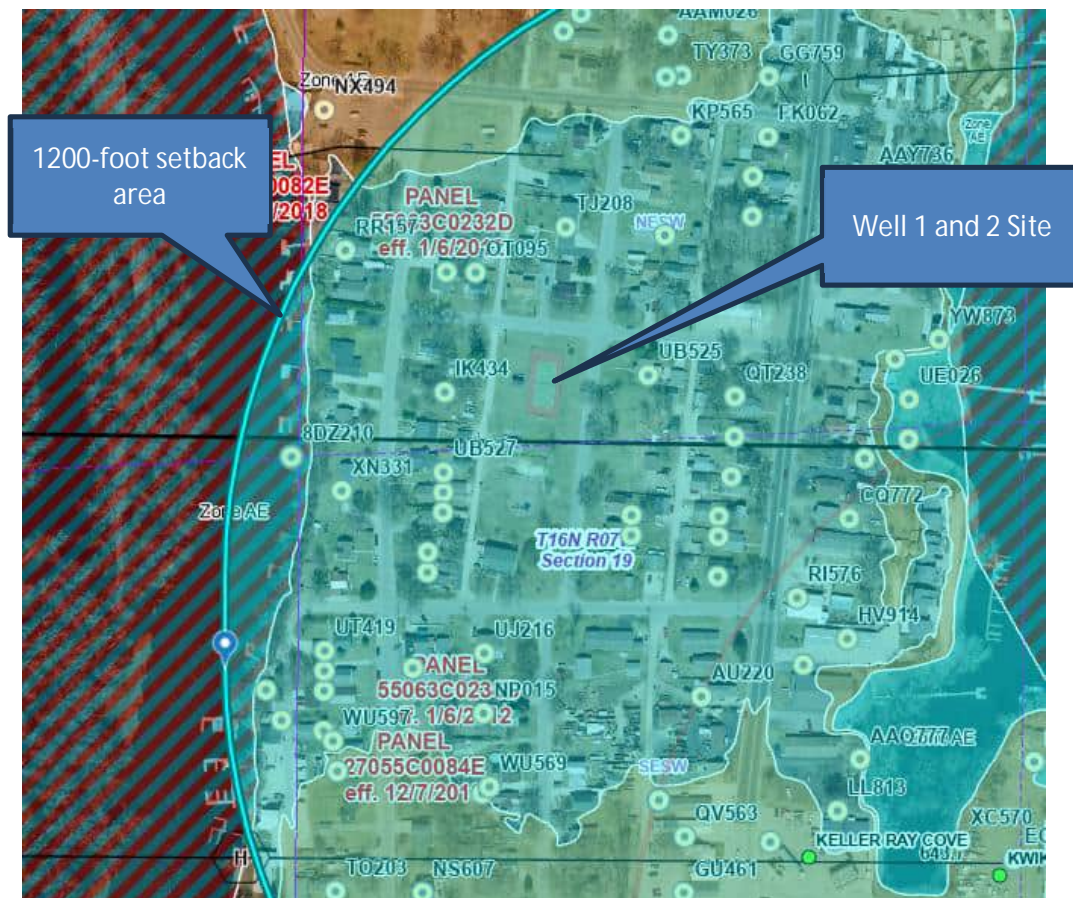


<sup>3</sup> Great Lakes – Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 2018.

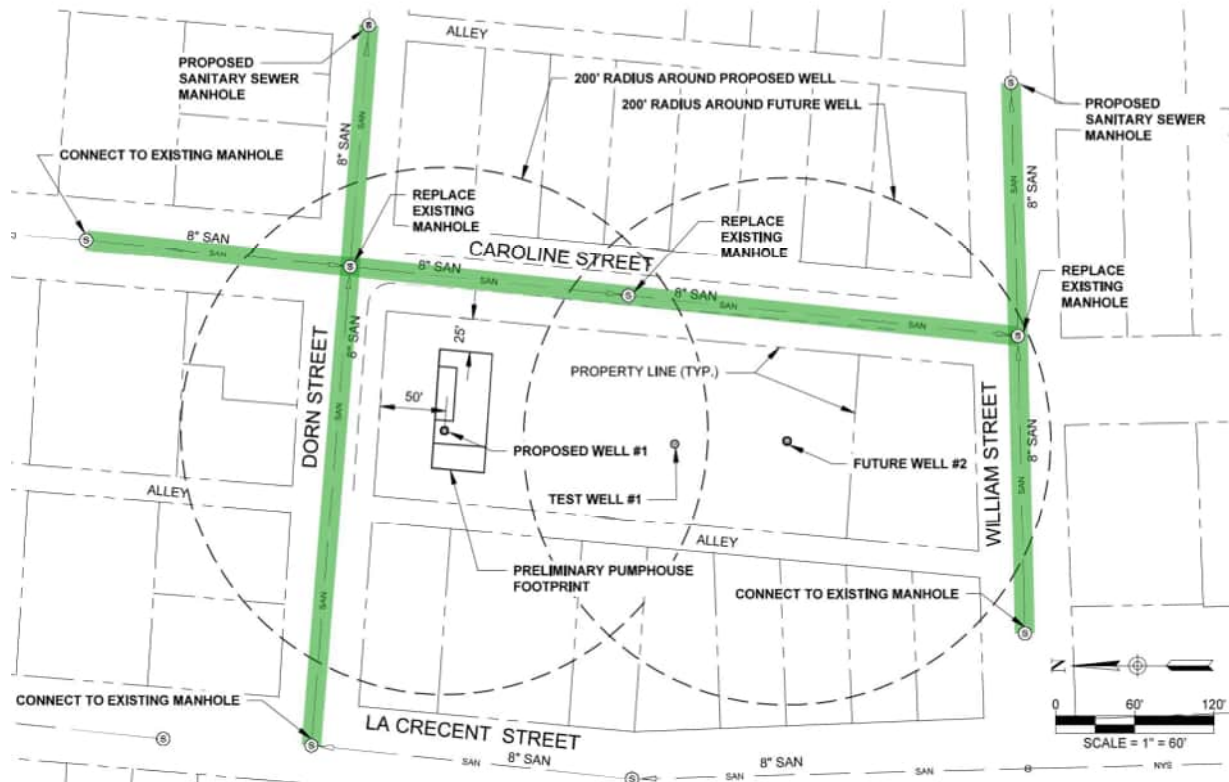
<sup>4</sup> Available online at

<https://apps.dnr.wi.gov/wellconstructionpub/ReportViewer.aspx?id=WellConstructionReport&download=false&WUWN=ACJ739>

The proposed well site is located within 1,200 feet of the Torrance-Black River Disposal Site, a closed landfill.



Additional issues with source of supply planning include the presence of existing sanitary sewer infrastructure within 200 feet of the proposed well sites. NR 811 requires these utilities that are within 200 feet of a municipal well be relocated or replaced with pressure-grade pipe. Although the PER includes costs for achieving this, they are not detailed and do not account for any additional well sites being needed.



Furthermore, the PER appears to assume that abandonment of existing private wells will be a homeowner responsibility, but the introduction of multiple high-capacity production wells dramatically increases the risk of dewatering or impairing private wells. This circumstance typically requires a coordinated abandonment and replacement plan to minimize service disruptions and address potential drawdown impacts. The lack of recognition of these requirements may results in additional underestimation of the total project cost and implementation challenges.

### Water Treatment Facilities

The PER proposes to use a hydrous manganese oxide (HMO) filtration process for radium, manganese, and iron removal. While HMO filtration is an appropriate technology for radium removal, the PER does not address radon off-gassing or mitigation measures, which are typically necessary for groundwater systems treating radionuclides. The omission of radon considerations represents a notable regulatory and operational deficiency. The PER also suggests two large horizontal pressure filters, which would produce large backwash volumes for cleaning the filters. It is estimated that these volumes will be over 30,000 gallons per filter. The PER does not account for the radionuclide concentrations expected in this waste stream or the impacts these flows will have on the downstream wastewater collection and treatment system. This backwash water will contain measurable quantities of radium-bearing solids, requiring proper handling and potentially permitting under Wisconsin Department of Health Services (WDHS) or WDNR regulations.

In addition to process omissions, the treatment facility sizing information provided in the PER is incomplete. The filter vessel dimensions, building footprint, and interior space allocations appear undersized for a facility of this scale, and no detailed layout or verification of compliance with NR 811 spacing and access requirements is provided. Similarly, it is unclear if redundant pumping equipment is



provided throughout the treatment process, including backwash supply, backwash reclaim, backwash waste and high service pumping.

Sludge management practices are also not described, as the PER lacks a plan for storage, handling, or disposal of radium-containing solids. The absence of these critical design elements makes it difficult to assess whether the proposed treatment facility is properly sized or feasible for long-term operation; however, a high-level analysis can be provided based on the information presented in the PER.

Radionuclide-laden waste must meet the not exceed a Unity Equation value of 1 as calculated based upon the requirements of the Department of Health Services under *Wisconsin Administrative Code* § DHS 157.30 and Appendix E of DHS 157. Calculations can be done to ensure the concentration of effluent does not exceed this number and thus dictate the maximum run time before system backwash is required.

The Unity Equation calculation is as follows:

$$(Avg. Radium 226 \text{ in } pCi/L \div 600) + (Avg. Radium 228 \text{ in } pCi/L \div 600) + (Avg. Total Uranium \text{ in } pCi/L \div 3000) < 1$$

Average concentrations in the equation are equal to the volume of well water treated between backwashing in gallons multiplied by the concentration of that contaminant type and the process removal efficiency, then divided by the total volume of backwash. For this calculation, it was assumed there would be 99% removal efficiency, and that no Uranium is present. This calculation is for one (1) 1,500 gpm treatment vessel with four (4) cells, each requiring 5 minutes of backwash at an equal rate to the influent flow. The following calculations dictate total allowable time between backwashes, to keep the value of the Unity Equation less than 1.

<b>Hours of Run Time</b>								
22								
<b>Raw Water Concentrations (pCi/L)</b>	<b>Liters in a Gal</b>	<b>Treatment Flow Rate (gpm)</b>	<b>Volume of Water Treated (gal)</b>	<b>Process Removal Efficiency Assumption (highest case)</b>	<b>Backwash Run Time (minutes)</b>	<b>Backwash Flow Rate (gpm)</b>	<b>Volume of Backwash (gal)</b>	
Radium-226 and 228	9.02	1500	1980000	99%	20	1500	30000	
Total Uranium	0			99%				
				99%				
<b>Concentration Output</b>								
Radium-226 and 228	589.4 pCi/L							
Uranium	0 pCi/L							
<b>Unity Equation Output</b>								
<b>0.982278</b>								
<b>Check? (Pass/Fail)</b>	<b>PASS</b>							

The maximum allowable run time between backwashes, given the outlined assumptions, is 22 hours. If it is assumed that an average day 530,000 GPD as shown in Campbell's PER, this would equate to less than four (4) days of continuous service of a vessel before the need for backwash. If it is assumed that average day usage is the Donohue-calculated 420,000 GPD, this would equate to an additional day of service before necessitating backwash. In either circumstance, this backwash regularity is more frequent than typical for a pressure filtration system treating groundwater.

### Elevated Storage Tank

The PER proposes a 700,000-gallon elevated storage tank. The volume is based on a two-hour fire flow requirement; however, Insurance Services Office and industry guidance typically recommends providing

storage for a three-hour fire flow event. It is likely that the required storage volume should be higher than the 700,000-gallon proposed.

Storage facilities must have sufficient capacity to meet domestic demands and fire flow and provide operating storage, the daily fluctuation of water to provide tank turnover and appropriate pump operation. Previous study by the City of La Crosse indicated that areas currently served by municipal water can receive 3,500 gpm, which is consistent with the requirement for industrial land use; similarly, the City applies a 3 hour fire duration.<sup>5</sup> Operating storage is typically about 15% of a tank's volume.

In the case that a filter is in backwash, storage will be needed to supplement the domestic (non-fire flow demands). The PER indicates that the filters each have an area of 300 square feet, which equates to a flow of 900 gpm at the standard loading rate of 3 gpm/sf. Each filter requires about 1 hour to backwash so 600 gpm for 1 hour will need to be provided in storage. Therefore, the tank volume should be

$$1.15 * [1 \text{ hour} \times 600 \text{ gpm} \times 60 \frac{\text{min}}{\text{hour}} + 3 \text{ hours} \times 3,500 \text{ gpm} \times 60 \frac{\text{min}}{\text{hour}}] = 765,900$$

An 750,000 or 1,000,000-gallon tank—industry standard sizes—should be considered.

### Comparison Summary

Overall, the review of supply, treatment, and storage components indicates that several critical assumptions in the PER are either incomplete or inconsistent with industry standards and regulatory requirements. The well siting and production assumptions do not seem to reflect the constraints of the local aquifer or the interference expected between closely spaced high-capacity wells. Treatment facility sizing lacks key design elements, most notably the incomplete sludge and waste management strategies as well as lack of detailed information on facility sizing. Storage volume calculations rely on a shortened fire flow duration. Collectively, these issues suggest that the PER underestimates both the scale and cost of the facilities needed to develop an independent Campbell Water Utility and that further engineering analysis will be required to establish realistic system sizing.

## Capital and O&M Cost Estimates for Independent Campbell System

### Review of Campbell-Submitted Costs

Findings from a review of the capital and operation and maintenance costs presented in the PER indicate:

- Capital cost estimates appear low, particularly for building square footage (8,500 SF assumed), lack of redundancy in critical treatment components such as aerator, backwash supply, clearwell and pumping, and well capacity assumptions where costs for only 2 wells are presented.
- Capital costs for water main piping are generally low, especially given that construction will not take place for several years and that funding will require federal wage rates and preference for domestic products.
- Contingencies are included at only 10% of estimated construction costs. At this stage of project development, a higher contingency is more appropriate.
- Project costs include 50% of general street construction costs but WDNR guidance for Safe Drinking Water Loan Program allows only 20% of these costs to be eligible for funding.<sup>6</sup>
- O&M costs are significantly understated:
  - Chemical cost is underestimated

<sup>5</sup> Technical Memorandum: Town of Campbell System Evaluation, AECOM, April 9, 2024.

<sup>6</sup> [https://dnr.wisconsin.gov/sites/default/files/topic/Aid/loans/pubs/PolicyPaper\\_StreetReconstructionCost.pdf](https://dnr.wisconsin.gov/sites/default/files/topic/Aid/loans/pubs/PolicyPaper_StreetReconstructionCost.pdf)



- Wages for staffing, particularly with construction and startup of a new facility is unrealistic.
- The total operating expenses of \$396,000 are low compared to an average of \$550,000 reported by similar size water utilities in Wisconsin, according to the PSC.<sup>7</sup>

### Updated Cost Information (Donohue Analysis)

Donohue capital and operation and maintenance costs presented on a life cycle basis, found in Appendix 2. Modifications from the PER costs include:

- Increasing building to 10,000 SF to accommodate redundant critical treatment components such as aerator, backwash supply, clearwell and pumping, to provide a firm capacity of 1,500 gpm when one unit in a system is out of service.
- Backup pumps for all pumping situations.
- Increased tank volume for backwash waste and decanting water to sanitary sewer.
- Contingencies are included at 20% of estimated construction costs based on this preliminary stage of project development.
- Increased operation and maintenance costs including power consumption based on the requirement that system will need to use on-peak power, chemical costs, wages for staffing based on the significant time for construction and startup of a new facility and working with property owners to connect to the new system and abandon private wells.

### Comparison Summary

The capital and operation and maintenance costs were further organized into the PSC Uniform System of Accounts. Tables for capital costs and operation and maintenance costs are found in Appendix 3. For basis of comparison, street restoration costs have been included at 20% for both cases and the sewer piping upgrades for sewer system within 200 feet of wells, which will need to be paid to sewer utility, are shown as a line item in the TM Analysis and are included in total for the PER.

Source	PER	TM Analysis
Capital Costs	\$64,775,500	\$67,138,004
Adjust for Street Restoration: Deduct 30% of Street Restoration from PER and add 20% of Street Restoration Costs to TM Analysis	-4,177,500	2,785,000
Sewer Piping Upgrade – Payable to Sewer Utility	374,000	374,000
Total	\$60,972,000	\$70,297,004

Operation and Maintenance Costs were also compared, with the PER underestimating the annual operation and maintenance costs of the system.

Source	PER	TM Analysis
Operation and Maintenance Costs	\$396,000	\$598,973

<sup>7</sup> Application of the Town of Campbell, as a Water Public Utility, for Authority to Construct a New Water System, in the Town of Campbell, La Crosse County, Wisconsin, PSC, October 29, 2025

## Facilities Unnecessary if City of La Crosse Supplies Water

If the City of La Crosse supplies potable water to the Town of Campbell, several major facilities identified in the PER for an independent Campbell Water Utility would not be required. The PER proposes a fully independent system built around new groundwater supply wells, dedicated treatment facilities, and an elevated storage tank. Under a City-supplied water scenario, these components become unnecessary, significantly reducing both capital and long-term operational costs.

The proposed production wells along with their associated appurtenances would not be needed because source water would be provided through the existing La Crosse Water Utility system. The proposed pumphouse and hydrous manganese oxide (HMO) treatment facility would also be eliminated, avoiding the need to construct and operate a radium removal system and manage its corresponding waste stream. Similarly, the 700,000-gallon elevated storage tank included in the PER would not be required, as storage, fire flow capacity, and system pressure would be maintained by the City of La Crosse's established infrastructure. Finally, new water main on Nokomis Avenue (the Hiawatha Distribution System) that would run parallel to existing City water main can be eliminated.

Using the capital cost values developed in this report, eliminating the wells, treatment plant, elevated storage tank and unneeded water main represents an estimated capital cost reduction of about \$30 million. The table below provides a summary of the cost difference.

ITEM	Initial Cost (\$)	Costs if Water Supplied by City \$
Well 1	877,879	0
Pumphouse & Radium Removal Treatment	20,127,000	0
Elevated Storage Tank	5,208,000	0
Well 2, Pitless Unit and Water Main to Pumphouse	853,875	0
Main Water Distribution System	35,746,650	35,746,650
Hiawatha Distribution System	3,063,850	0
Meters & Metering/Billing	1,260,750	1,260,750
Totals	67,138,004	37,007,400
Sewer Upgrade to Pressure Pipe - payment to Sewer Utility	374,000	
Street Restoration - 20%	2,785,000	2,785,000
<b>Total</b>	<b>70,297,004</b>	<b>39,792,400</b>

## Radium Discharge to City of La Crosse WWTF

The PER does not adequately address the handling and disposal of radium-bearing waste generated by the proposed hydrous manganese oxide (HMO) treatment process. Radium-containing water and solids must be managed in accordance with *Wisconsin Administrative Code* § NR 811.856 and § DHS 157.30(3), which establish requirements for wastewater discharge and radioactive materials handling.

Radium will continue to accumulate in the pressure filters, and when backwashed, will be dislodged in both backwash solids as well as suspended in backwash water. Because radium removal processes typically produce radium-laden sludge, it is expected that the majority of the radionuclide mass would

accumulate in solids rather than remain in solution. Proper management of this sludge may necessitate a DHS radioactive materials permit, depending on radionuclide concentrations and disposal methods. To mitigate handling of radium-laden sludge, backwash durations will need to follow the unity rule, as described in the *Water Treatment Facilities* section of this report. With the example unity rule calculation, total radium concentration in combined backwash (solids and water) would be nearly 600 pCi/L, which is the limit for discharge to sanitary sewer systems. Even with careful management of backwash intervals, the tank may need to be periodically cleaned and the sludge removed for landfilling.

The PER does not include any sludge characterization, handling, or disposal plan, representing a significant deficiency. Without this information, the feasibility, regulatory compliance, and long-term operational impacts of discharging radium-bearing waste to the City of La Crosse WWTF cannot be fully evaluated.

## Appendix 1

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### **Proposed Water System Map**



## Appendix 2

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### **Life Cycle Cost Analysis**



Town of Campbell /Village of French Island  
Independent Water System  
Engineering Evaluation

**SUMMARY**  
**INDEPENDENT WATER SYSTEM DEVELOPMENT**  
**PLANNING LEVEL COST OPINIONS**

General Description

ITEM	Initial Cost (\$)	10-Year Present Worth of Annual O&M (\$)	20-Year Present Worth of Annual O&M (\$)	10-Year Total Present Worth (\$)	20-Year Total Present Worth (\$)
1 Well 1	877,879	1,075	1,376	934,862	1,011,638
2 Pumphouse & Radium Removal Treatment	20,127,000	313,381	339,886	23,438,798	27,001,790
3 Elevated Storage Tank	5,208,000	1,597	1,846	5,245,596	5,427,651
4 Well 2, Pitless Unit and Water Main to Pumphouse	853,875	26,524	25,775	1,158,405	1,418,884
5 Main Water Distribution System	35,746,650	70,174	67,343	36,463,004	37,154,979
6 Hiawatha Distribution System	3,063,850	2,873	2,759	3,096,859	3,127,942
7 Meters & Metering/Billing	1,260,750	143,988	137,149	2,729,487	4,139,781
Totals	67,138,004	559,613	576,134	73,067,010	79,282,665
Sewer Upgrade to Pressure Pipe - payment to Sewer Utility	374,000				
Street Restoration - 20%	2,785,000				
Total	70,297,004				

Town of Campbell /Village of French Island  
Independent Water System  
Engineering Evaluation

**WELL 1**  
**INDEPENDENT WATER SYSTEM DEVELOPMENT**  
**OPINION OF PROBABLE PROJECT COST**

ITEM	Units	Quantity	Unit Cost (\$)	Initial Cost (\$)
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**BID TABULATION**

BID DATE: 12/10/2024

OWNER: Town of Campbell, La Crosse County, WI

PROJECT: Final Well #1 Construction

Contractors:				Traut Companies St. Joseph, MN		Municipal Well & Pump Waupun, WI		Nelson's Plumbing & Electric Tomah, WI	
No.	Qty	Unit	Item	Unit	Total	Unit	Total	Unit	Total
<b>UNIT PRICES</b>									
1	1	LS	Mobilization/Demobilization	\$ 66,760.00	\$ 66,760.00	\$ 118,260.00	\$ 118,260.00	\$ 102,505.00	\$ 102,505.00
2	1	LS	Temp Access Road, Site Prep, Erosion Control	\$ 17,830.00	\$ 17,830.00	\$ 21,900.00	\$ 21,900.00	\$ 6,456.00	\$ 6,456.00
3	20	vert. ft.	Drill/Drive/Remove 24-in OD Temp Starter Casing	\$ 500.00	\$ 10,000.00	\$ 285.00	\$ 5,700.00	\$ 256.00	\$ 5,120.00
4	185	vert. ft.	Drill Nominal 24-inch Open Hole	\$ 240.00	\$ 44,400.00	\$ 197.00	\$ 36,445.00	\$ 120.00	\$ 22,200.00
5	7	each	Alignment/Plumbness Tests	\$ 5,000.00	\$ 35,000.00	\$ 1,989.00	\$ 13,923.00	\$ 650.00	\$ 4,550.00
6	191	vert. ft.	Furnish & Install 18-inch OD Casing	\$ 270.00	\$ 51,570.00	\$ 199.00	\$ 38,009.00	\$ 136.00	\$ 25,976.00
7	320	cu. ft.	Bradenhead Grout 18-inch Casing	\$ 34.00	\$ 10,880.00	\$ 45.00	\$ 14,400.00	\$ 60.00	\$ 19,200.00
8	314	vert. ft.	Drill Nominal 18-inch Open Hole	\$ 140.00	\$ 43,960.00	\$ 122.00	\$ 38,308.00	\$ 95.00	\$ 29,830.00
9	3	each	Video Log	\$ 2,500.00	\$ 7,500.00	\$ 4,093.00	\$ 12,279.00	\$ 1,500.00	\$ 4,500.00
10	2	each	Geophysical Logs	\$ 3,000.00	\$ 6,000.00	\$ 5,420.00	\$ 10,840.00	\$ 1,500.00	\$ 3,000.00
11	20	hours	Removing Sand	\$ 650.00	\$ 13,000.00	\$ 525.00	\$ 10,500.00	\$ 250.00	\$ 5,000.00
12	18	hours	Air Development	\$ 650.00	\$ 11,700.00	\$ 2,774.00	\$ 49,932.00	\$ 500.00	\$ 9,000.00
13	25	lbs	Dynamite Development	\$ 80.00	\$ 2,000.00	\$ 824.00	\$ 20,600.00	\$ 510.00	\$ 12,750.00
14	1	LS	Acid/Surfactant Chemical Treatment	\$ 9,000.00	\$ 9,000.00	\$ 46,250.00	\$ 46,250.00	\$ 6,500.00	\$ 6,500.00
15	1	LS	Shock Chlorination Chemical Treatment	\$ 9,000.00	\$ 9,000.00	\$ 17,440.00	\$ 17,440.00	\$ 6,500.00	\$ 6,500.00
16	1	LS	Plug Well Bottom	\$ 6,000.00	\$ 6,000.00	\$ 6,140.00	\$ 6,140.00	\$ 1,500.00	\$ 1,500.00
17	3	each	Caliper Open Hole	\$ 3,000.00	\$ 9,000.00	\$ 1,980.00	\$ 5,940.00	\$ 1,500.00	\$ 4,500.00
18	750	lin. ft.	Discharge Piping	\$ 10.00	\$ 7,500.00	\$ 10.00	\$ 7,500.00	\$ 5.00	\$ 3,750.00
19	2	each	Furnish, Install and Remove Test Pump	\$ 16,000.00	\$ 32,000.00	\$ 12,835.00	\$ 25,670.00	\$ 7,500.00	\$ 15,000.00
20	8	hours	Rawhiding Development	\$ 350.00	\$ 2,800.00	\$ 475.00	\$ 3,800.00	\$ 150.00	\$ 1,200.00
21	8	hours	Step Drawdown Test Pumping	\$ 350.00	\$ 2,800.00	\$ 354.00	\$ 2,832.00	\$ 125.00	\$ 1,000.00
22	24	hours	Initial 24-Hour Constant Rate Test Pumping	\$ 275.00	\$ 6,600.00	\$ 354.00	\$ 8,496.00	\$ 150.00	\$ 3,600.00
23	48	hours	Constant Rate Test Pumping > 24 Hours	\$ 275.00	\$ 13,200.00	\$ 354.00	\$ 16,992.00	\$ 120.00	\$ 5,760.00
24	1	LS	Well Disinfection	\$ 1,500.00	\$ 1,500.00	\$ 1,920.00	\$ 1,920.00	\$ 1,000.00	\$ 1,000.00
25	1	LS	All Above Grade Work	\$ 19,410.00	\$ 19,410.00	\$ 17,250.00	\$ 17,250.00	\$ 3,520.00	\$ 3,520.00
<b>TOTAL (Items 1-25)</b>					\$ 439,410.00		\$ 551,326.00		\$ 303,917.00
<b>TOTAL BASE BID</b>					\$ 439,410.00		\$ 551,326.00		\$ 303,917.00
<b>ALTERNATE BID #1 - ALTERNATE SCHEDULE</b>									
Substantial Completion Date:				NB		NB		10/15/2025	
No change, Add to, or Deduct					\$ -		\$ -	No change	\$ -
TOTAL Alternate Bid #1					\$ -		\$ -		\$ 303,917.00
<b>TOTAL BID - BASE BID+ALT BID #1</b>					\$ 439,410.00		\$ 551,326.00		\$ 303,917.00
								<b>RECOMMENDED AWARD</b>	

Subtotal	303,917
Contingency - contract price shown	5% 20,000
Subtotal	323,917
<b>Total Construction Cost</b>	<b>323,917</b>
Engineering - from PER Appendix 5-1	553,962
<b>Total Initial Cost</b>	<b>877,879</b>

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Well 1

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	<b>2.0%</b>
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		877,879									
				PSC Account							
				600	620	602	630				
Year (n)	Periodic Costs		Annual Operational Costs					PW	PW	PW	
	Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual	Periodic	Annual	Cumulative	
0			800	0	1,037	0	1,837			877,879	
1			828	0	1,094	0	1,922	0	1,866	879,745	
2			857	0	1,154	0	2,011	0	1,896	881,641	
3			887	0	1,218	0	2,105	0	1,926	883,567	
4			918	0	1,285	0	2,203	0	1,957	885,524	
5			950	0	1,355	0	2,305	0	1,989	887,513	
6			974	0	1,416	0	2,390	0	2,002	889,514	
7			998	0	1,480	0	2,478	0	2,015	891,529	
8			1,023	0	1,547	0	2,570	0	2,029	893,558	
9			1,049	0	1,616	0	2,665	0	2,043	895,601	
10	50,000		1,075	0	1,689	0	2,764	37,205	2,057	934,862	

<b>10-Year Present Worth</b>	<b>934,862</b>
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Well 1	
Initial Cost	877,879
10-Year Present Worth	934,862
Average Annual Cost	4,841

### Notes

Power cost for well pumping is included in 2 - Water Treatment/Pumphouse; no chemicals required at well; well rehab every 10 years

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Well 1

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	<b>2.0%</b>
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		877,879		PSC Account						
		600	620	640	630					
Year (n)	Periodic Costs Replace Salvage	Annual Operational Costs				PW Periodic	PW Annual	PW Cumulative		
		O&M	Electricity	Sampling	Chemicals	Total Annual				
0		800	0	1,037	0	1,837		877,879		
1		828	0	1,094	0	1,922	0	879,745		
2		857	0	1,154	0	2,011	0	881,641		
3		887	0	1,218	0	2,105	0	883,567		
4		918	0	1,285	0	2,203	0	885,524		
5		950	0	1,355	0	2,305	0	887,513		
6		974	0	1,416	0	2,390	0	889,514		
7		998	0	1,480	0	2,478	0	891,529		
8		1,023	0	1,547	0	2,570	0	893,558		
9		1,049	0	1,616	0	2,665	0	895,601		
10	50,000	1,075	0	1,689	0	2,764	37,205	934,862		
11		1,102	0	1,765	0	2,867	0	936,933		
12		1,129	0	1,844	0	2,974	0	939,019		
13		1,158	0	1,927	0	3,085	0	941,120		
14		1,187	0	2,014	0	3,201	0	943,236		
15		1,216	0	2,105	0	3,321	0	945,367		
16		1,247	0	2,199	0	3,446	0	947,515		
17		1,278	0	2,298	0	3,576	0	949,679		
18		1,310	0	2,402	0	3,712	0	951,859		
19		1,343	0	2,510	0	3,853	0	954,056		
20	100,000	1,376	0	2,623	0	3,999	55,368	1,011,638		

<b>20-Year Present Worth</b>	<b>1,011,638</b>
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Well 1	
Initial Cost	877,879
20-Year Present Worth	1,011,638
Average Annual Cost	10,372

### Notes

Power cost for well pumping is included in 2 - Water Treatment/Pumphouse; no chemicals required at well; well rehab every 10 years; replace well pump in year 20

Town of Campbell /Village of French Island  
Independent Water System  
Engineering Evaluation

**PUMPHOUSE & RADIUM REMOVAL TREATMENT  
INDEPENDENT WATER SYSTEM DEVELOPMENT  
OPINION OF PROBABLE PROJECT COST**

ITEM	Units	Quantity	Unit Cost (\$)	Initial Cost (\$)
<b>Radium Removal Treatment</b>				
4-Cell Horizontal Pressure Filter w/ Media	EA	2	1,350,000	2,700,000
Forced Draft Aerator	EA	2	163,000	326,000
Well Pump	EA	1	60,000	60,000
High Service Pumps - 2 for redundancy	EA	2	50,000	100,000
Backwash Pumps - 2 for redundancy	EA	2	20,000	40,000
Backwash Waste Pump - 2 for redundancy	EA	2	15,000	30,000
Backwash Supply Booster Pump	EA	2	20,000	40,000
Chemical Feed Equipment	EA	2	120,000	240,000
Clearwell, 2 @ 45,000 gallons	CY	220	1,000	220,000
Backwash Storage Tank, 2 @ 72,300 gallons	CY	290	1,000	290,000
Backwash Reclaim Tank, 1 @ 109,000 gallons	CY	201	1,000	201,000
Treatment Building Slab	CY	475	1,000	475,000
Excavation	CY	3,500	40	140,000
Treatment Building	SF	10,000	500	5,000,000
Equipment Installation	LS	1	1,400,000	1,400,000
<b>Miscellaneous</b>				
Aluminum Access Hatches	EA	5	15,000	75,000
Furniture & Accessories	LS	1	100,000	100,000
<b>Other</b>				
Sitework	Lump Sum	1	700,000	700,000
Interior Process Piping	Lump Sum	1	700,000	700,000
HVAC	Lump Sum	1	100,000	100,000
Plumbing	Lump Sum	1	100,000	100,000
Electrical	Lump Sum	1	1,500,000	1,500,000
I&C	Lump Sum	1	700,000	700,000
Subtotal				15,237,000
Contingency			20%	3,050,000
Subtotal				18,287,000
<b>Total Construction Cost</b>				<b>18,287,000</b>
Engineering - PER Cost Estimate for Pumphouse/Treatment, Appendix 5-3				1,840,000
<b>Total Initial Cost</b>				<b>20,127,000</b>

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Pumphouse & Radium Removal Treatment

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	<b>2.0%</b>
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		20,127,000		PSC Account							
		630	620	640	630						
Year (n)	Periodic Costs	Annual Operational Costs					PW Periodic	PW Annual	PW Cumulative		
	Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual				
0			143,660	80,000	2,708	45,000	271,368			20,127,000	
1			148,688	86,000	2,857	47,925	285,470	0	277,155	20,404,155	
2			153,892	92,450	3,014	51,040	300,396	0	283,152	20,687,308	
3			159,278	99,384	3,180	54,358	316,200	0	289,368	20,976,675	
4			164,853	106,838	3,355	57,891	332,936	0	295,810	21,272,485	
5		10,000	170,623	114,850	3,539	61,654	350,667	8,626	302,488	21,583,599	
6			174,889	120,019	3,699	65,045	363,651	0	304,552	21,888,151	
7			179,261	125,419	3,865	68,622	377,168	0	306,672	22,194,822	
8			183,742	131,063	4,039	72,397	391,241	0	308,849	22,503,672	
9			188,336	136,961	4,221	76,378	405,896	0	311,086	22,814,757	
10		417,500	193,044	143,124	4,411	80,579	421,158	310,659	313,381	23,438,798	

### 10-Year Present Worth

**23,438,798**

Pumphouse & Radium Removal Treatment		
Initial Cost		20,127,000
10-Year Present Worth		23,438,798
Average Annual Cost		375,853

### Notes

Media replacement every 10 years; Pump rehabs every 10 years; Well pump inspection every 10 years; periodic costs other than pumps are from Table 7.8 Short-Lived Assets; electricity costs include Well 1 and all pumps within WTP and are based on use during peak demand; backwash tank cleaning every 3 years with disposal of sludge is included in annual O & M cost



# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Pumphouse & Radium Removal Treatment

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	<b>2.0%</b>
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		20,127,000								
				PSC Account						
				600	620	640	630			
Year (n)	Periodic Costs	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual	PW Periodic	PW Annual	PW Cumulative
0			143,660	80,000	2,708	45,000	271,368			20,127,000
1			148,688	86,000	2,857	47,925	285,470	0	277,155	20,404,155
2			153,892	92,450	3,014	51,040	300,396	0	283,152	20,687,308
3			159,278	99,384	3,180	54,358	316,200	0	289,368	20,976,675
4			164,853	106,838	3,355	57,891	332,936	0	295,810	21,272,485
5	10,000		170,623	114,850	3,539	61,654	350,667	8,626	302,488	21,583,599
6			174,889	120,019	3,699	65,045	363,651	0	304,552	21,888,151
7			179,261	125,419	3,865	68,622	377,168	0	306,672	22,194,822
8			183,742	131,063	4,039	72,397	391,241	0	308,849	22,503,672
9			188,336	136,961	4,221	76,378	405,896	0	311,086	22,814,757
10	417,500		193,044	143,124	4,411	80,579	421,158	310,659	313,381	23,438,798
11			197,870	149,565	4,609	85,011	437,055	0	315,738	23,754,536
12			202,817	156,295	4,816	89,687	453,616	0	318,157	24,072,693
13			207,888	163,329	5,033	94,619	470,869	0	320,639	24,393,332
14			213,085	170,679	5,260	99,823	488,846	0	323,185	24,716,517
15	90,000		218,412	178,359	5,496	105,314	507,581	57,768	325,797	25,100,081
16			223,872	186,385	5,744	111,106	527,107	0	328,476	25,428,557
17			229,469	194,773	6,002	117,217	547,461	0	331,223	25,759,780
18			235,206	203,537	6,272	123,664	568,679	0	334,039	26,093,819
19			241,086	212,697	6,554	130,465	590,802	0	336,926	26,430,745
20	417,500		247,113	222,268	6,849	137,641	613,871	231,160	339,886	27,001,790

<b>20-Year Present Worth</b>	<b>27,001,790</b>
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Pumphouse & Radium Removal Treatment	
Initial Cost	20,127,000
20-Year Present Worth	27,001,790
Average Annual Cost	484,284

### Notes

Media replacement every 10 years; Pump rehabs every 10 years; Well pump inspection every 10 years; electricity and chemicals values are from PER page 32/42 and periodic costs other than pumps are from Table 7.8 Short-Lived Assets

Town of Campbell /Village of French Island  
Independent Water System  
Engineering Evaluation

**Elevated Storage Tank**  
**INDEPENDENT WATER SYSTEM DEVELOPMENT**  
**OPINION OF PROBABLE PROJECT COST**

ITEM	Units	Quantity	Unit Cost (\$)	Initial Cost (\$)
<b>Tower</b>				
12" Water Main	EA	100	150	15,000
Site Work	LS	1	13,000	22,000
Excavation	CY	200	50	10,000
Borrow	CY	500	25	12,500
Foundation	LS	1	170,000	170,000
700,000-gal spherical tank	LS	1	2,640,000	2,640,000
Painting	LS	1	300,000	300,000
Piping & manhole	EA	2	120,000	240,000
Disinfection & sampling	EA	1	5,000	5,000
Electrical & controls	LS	1	80,000	80,000
Recirculation system	LS	1	30,000	30,000
Cathodic protection	LS	1	35,000	35,000
Erosion control & site restoration	LS	1	10,000	10,000
Subtotal				3,569,500
Contingency			20%	710,000
Subtotal				4,279,500
Contractor Overhead & Profit			0%	0
<b>Total Construction Cost</b>				<b>4,279,500</b>
Engineering - PER Cost Estimate for Pumphouse/Treatment, Appendix 5-5				928,500
<b>Total Initial Cost</b>				<b>5,208,000</b>

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Elevated Storage Tank

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	<b>2.0%</b>
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		5,208,000								
Year (n)	Periodic Costs		Annual Operational Costs					PW Periodic	PW Annual	PW Cumulative
	Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual			
0			0	1,200	0	0	1,200			5,208,000
1			0	1,290	0	0	1,290	0	1,252	5,209,252
2			0	1,387	0	0	1,387	0	1,307	5,210,560
3			0	1,491	0	0	1,491	0	1,364	5,211,924
4			0	1,603	0	0	1,603	0	1,424	5,213,348
5	12,000		0	1,723	0	0	1,723	10,351	1,486	5,225,185
6			0	1,800	0	0	1,800	0	1,508	5,226,693
7			0	1,881	0	0	1,881	0	1,530	5,228,222
8			0	1,966	0	0	1,966	0	1,552	5,229,774
9			0	2,054	0	0	2,054	0	1,575	5,231,349
10	17,000		0	2,147	0	0	2,147	12,650	1,597	5,245,596

<b>10-Year Present Worth</b>	<b>5,245,596</b>
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Elevated Storage Tank	
Initial Cost	5,208,000
10-Year Present Worth	5,245,596
Average Annual Cost	3,184

### Notes

Reservior light replacement every 5 years; ROV inspection at year 5 and drain down inspection at year 10

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Elevated Storage Tank

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	<b>2.0%</b>
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		5,208,000								
Year (n)	Periodic Costs Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual	PW Periodic	PW Annual	PW Cumulative
0			0	1,200	0	0	1,200			5,208,000
1			0	1,290	0	0	1,290	0	1,252	5,209,252
2			0	1,387	0	0	1,387	0	1,307	5,210,560
3			0	1,491	0	0	1,491	0	1,364	5,211,924
4			0	1,603	0	0	1,603	0	1,424	5,213,348
5	12,000		0	1,723	0	0	1,723	10,351	1,486	5,225,185
6			0	1,800	0	0	1,800	0	1,508	5,226,693
7			0	1,881	0	0	1,881	0	1,530	5,228,222
8			0	1,966	0	0	1,966	0	1,552	5,229,774
9			0	2,054	0	0	2,054	0	1,575	5,231,349
10	17,000		0	2,147	0	0	2,147	12,650	1,597	5,245,596
11			0	2,243	0	0	2,243	0	1,621	5,247,217
12			0	2,344	0	0	2,344	0	1,644	5,248,861
13			0	2,450	0	0	2,450	0	1,668	5,250,529
14			0	2,560	0	0	2,560	0	1,693	5,252,222
15	242,000		0	2,675	0	0	2,675	155,331	1,717	5,409,270
16			0	2,796	0	0	2,796	0	1,742	5,411,012
17			0	2,922	0	0	2,922	0	1,768	5,412,780
18			0	3,053	0	0	3,053	0	1,793	5,414,573
19			0	3,190	0	0	3,190	0	1,819	5,416,392
20	17,000		0	3,334	0	0	3,334	9,412	1,846	5,427,651

<b>20-Year Present Worth</b>	<b>5,427,651</b>
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Elevated Storage Tank	
Initial Cost	5,208,000
20-Year Present Worth	5,427,651
Average Annual Cost	16,645

### Notes

Reservoir light replacement every 5 years; ROV inspection at year 5 and drain down inspection at year 10; cathodic protection maintenance at year 15; paint overcoat at year 15

Town of Campbell /Village of French Island  
Independent Water System  
Engineering Evaluation

**Well 2, Pitless Unit and Water Main to Pumphouse**  
**INDEPENDENT WATER SYSTEM DEVELOPMENT**  
OPINION OF PROBABLE PROJECT COST

ITEM	Units	Quantity	Unit Cost (\$)	Initial Cost (\$)
Well Construction	LS	1	458,000	458,000
Water Main to Pump House	LF	250	100	25,000
Connection at Well	LS	1	3,500	3,500
Submersible Pump	LS	1	32,000	32,000
Pitless Unit	LS	1	20,000	20,000
Motor Controls & SCADA	LS	1	70,000	70,000
Electrical	EA	1	24,000	24,000
Site Work	LS	1	40,000	40,000
Subtotal				672,500
Contingency			10%	70,000
Subtotal				742,500
<b>Total Construction Cost</b>				<b>742,500</b>
Engineering			15%	111,375
<b>Total Initial Cost</b>				<b>853,875</b>

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Well 2, Pitless Unit and Water Main to Pumphouse

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	<b>2.0%</b>
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		877,879									
		<div style="display: flex; justify-content: space-around; font-size: small;"> <span>600</span> <span>PSC Account</span> <span>620</span> <span>640</span> <span>630</span> </div>									
Year (n)	Periodic Costs Replace Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual	PW Periodic	PW Annual	PW Cumulative		
0		800	18,380	1,037	0	20,217			877,879		
1		828	19,758	1,094	0	21,680	0	21,049	898,928		
2		857	21,240	1,154	0	23,251	0	21,916	920,844		
3		887	22,833	1,218	0	24,938	0	22,821	943,665		
4		918	24,545	1,285	0	26,748	0	23,765	967,431		
5		950	26,386	1,355	0	28,692	0	24,750	992,180		
6		974	27,574	1,416	0	29,964	0	25,094	1,017,275		
7		998	28,814	1,480	0	31,293	0	25,444	1,042,719		
8		1,023	30,111	1,547	0	32,681	0	25,799	1,068,517		
9		1,049	31,466	1,616	0	34,131	0	26,159	1,094,676		
10	50,000	1,075	32,882	1,689	0	35,646	37,205	26,524	1,158,405		

### 10-Year Present Worth

**1,158,405**

Well 2, Pitless Unit and Water Main to Pumphouse		
Initial Cost		877,879
10-Year Present Worth		1,158,405
Average Annual Cost		31,402

### Notes

No chemicals required at well; well rehab every 10 years



# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Well 2, Pitless Unit and Water Main to Pumphouse

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	<b>2.0%</b>
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		PSC Account									
		600	620	640	630						
Year (n)	Periodic Costs Replace Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual	PW Periodic	PW Annual	PW Cumulative		
0		800	15,316	1,037	0	17,153			877,879		
1		828	16,465	1,094	0	18,387	0	17,852	895,731		
2		857	17,700	1,154	0	19,711	0	18,580	914,310		
3		887	19,027	1,218	0	21,132	0	19,339	933,649		
4		918	20,454	1,285	0	22,657	0	20,131	953,780		
5		950	21,989	1,355	0	24,294	0	20,956	974,736		
6		974	22,978	1,416	0	25,368	0	21,246	995,981		
7		998	24,012	1,480	0	26,490	0	21,539	1,017,520		
8		1,023	25,093	1,547	0	27,662	0	21,837	1,039,357		
9		1,049	26,222	1,616	0	28,887	0	22,139	1,061,497		
10	50,000	1,075	27,402	1,689	0	30,166	37,205	22,446	1,121,147		
11		1,102	28,635	1,765	0	31,502	0	22,757	1,143,905		
12		1,129	29,923	1,844	0	32,897	0	23,073	1,166,978		
13		1,158	31,270	1,927	0	34,355	0	23,394	1,190,372		
14		1,187	32,677	2,014	0	35,878	0	23,719	1,214,092		
15		1,216	34,148	2,105	0	37,469	0	24,050	1,238,142		
16		1,247	35,684	2,199	0	39,130	0	24,385	1,262,526		
17		1,278	37,290	2,298	0	40,866	0	24,725	1,287,251		
18		1,310	38,968	2,402	0	42,680	0	25,070	1,312,321		
19		1,343	40,722	2,510	0	44,574	0	25,420	1,337,741		
20	100,000	1,376	42,554	2,623	0	46,553	55,368	25,775	1,418,884		

<b>20-Year Present Worth</b>	<b>1,418,884</b>
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Well 2, Pitless Unit and Water Main to Pumphouse	
Initial Cost	877,879
20-Year Present Worth	1,418,884
Average Annual Cost	39,033

### Notes

Power cost for well pumping is included in 2 - Water Treatment/Pumphouse; no chemicals required at well; well rehab every 10 years; replace well pump in year 20

Town of Campbell /Village of French Island  
Independent Water System  
Engineering Evaluation

**Main Water Distribution System**  
**INDEPENDENT WATER SYSTEM DEVELOPMENT**  
**OPINION OF PROBABLE PROJECT COST**

ITEM	Units	Quantity	Unit Cost (\$)	Initial Cost (\$)
<b>Distribution</b>				
Traffic Control	LS	1	120,000	120,000
Pulverize/salvage pavement	SY	352,000	4	1,408,000
Place/comopact pulverized material	SY	352,000	3	1,056,000
Watermain, 14", through existing casing pipe	LF	350	250	87,500
Watermain, 14", through existing casing pipe	LF	750	135	101,250
Bore casing pipe	LF	600	300	180,000
Watermain, 12" HDPE (in casing)	LF	750	80	60,000
Watermain, 12" trenched	LF	12,900	170	2,193,000
Watermain, 10" trenched	LF	12,200	160	1,952,000
Watermain, 8" trenched	LF	17,400	150	2,610,000
Watermain, 6" trenched	LF	77,250	140	10,815,000
Watermain, 8" directionally drilled river crossing	LF	1,100	320	352,000
Valve & box, 14"	EA	4	14,000	56,000
Valve & box, 12"	EA	29	5,500	159,500
Valve & box, 10"	EA	37	4,400	162,800
Valve & box, 8"	EA	45	3,000	135,000
Valve & box, 6"	EA	305	2,200	671,000
Hydrant	EA	210	6,500	1,365,000
Hydrant lead, 6"	EA	6,300	140	882,000
Fittings (included in piping)	LB	0	15	0
<b>Services</b>				
Corporation stop, 1"	EA	1,526	350	534,100
Curb stop and box, 1"	EA	1,526	350	534,100
HDPE Service Pipe, 1"	LF	50,400	40	2,016,000
Corporation stop, 1.5"	EA	24	650	15,600
Curb stop and box, 1.5"	EA	24	650	15,600
HDPE Service Pipe, 1.5"	LF	800	55	44,000
2" Tee/valve	EA	24	2,400	57,600
2" HDPE service	LF	790	80	63,200
4" Tee/valve	EA	4	2,500	10,000
4" HDPE service	LF	120	70	8,400
Subtotal				27,664,650
Contingency			20%	5,530,000
Subtotal				33,194,650
<b>Total Construction Cost</b>				<b>33,194,650</b>
Engineering			0%	2,552,000
<b>Total Initial Cost</b>				<b>35,746,650</b>

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Main Water Distribution System

### Present Worth Analysis Factors

Discount Rate	3.000%
Short Term Inflation Rate	3.5%
Long-term Inflation Rate	2.5%
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	4.0%
Electricity (6-20 years)	2.0%
Equipment	2.0%
Chemicals	3.0%

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		35,746,650								
Year (n)	Periodic Costs		Annual Operational Costs					PW	PW	PW
	Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual	Periodic	Annual	Cumulative
0			67,710	0	2,040	0	69,750			35,746,650
1			70,080	0	2,152	0	72,232	0	70,128	35,816,778
2			72,533	0	2,271	0	74,803	0	70,509	35,887,287
3			75,071	0	2,395	0	77,467	0	70,893	35,958,180
4			77,699	0	2,527	0	80,226	0	71,280	36,029,460
5	5,000		80,418	0	2,666	0	83,084	4,313	71,669	36,105,443
6			82,429	0	2,786	0	85,215	0	71,366	36,176,809
7			84,489	0	2,912	0	87,401	0	71,065	36,247,874
8			86,602	0	3,043	0	89,644	0	70,766	36,318,640
9			88,767	0	3,179	0	91,946	0	70,469	36,389,109
10	5,000		90,986	0	3,323	0	94,308	3,720	70,174	36,463,004

10-Year Present Worth	36,463,004
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Main Water Distribution System	
Initial Cost	35,746,650
10-Year Present Worth	36,463,004
Average Annual Cost	84,133

### Notes

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Main Water Distribution System

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		35,746,650								
Year (n)	Periodic Costs		Annual Operational Costs					PW Periodic	PW Annual	PW Cumulative
	Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual			
0			67,710	0	2,040	0	69,750			35,746,650
1			70,080	0	2,152	0	72,232	0	70,128	35,816,778
2			72,533	0	2,271	0	74,803	0	70,509	35,887,287
3			75,071	0	2,395	0	77,467	0	70,893	35,958,180
4			77,699	0	2,527	0	80,226	0	71,280	36,029,460
5	5,000		80,418	0	2,666	0	83,084	4,313	71,669	36,105,443
6			82,429	0	2,786	0	85,215	0	71,366	36,176,809
7			84,489	0	2,912	0	87,401	0	71,065	36,247,874
8			86,602	0	3,043	0	89,644	0	70,766	36,318,640
9			88,767	0	3,179	0	91,946	0	70,469	36,389,109
10	5,000		90,986	0	3,323	0	94,308	3,720	70,174	36,463,004
11			93,261	0	3,472	0	96,733	0	69,882	36,532,885
12			95,592	0	3,628	0	99,220	0	69,591	36,602,476
13			97,982	0	3,792	0	101,773	0	69,303	36,671,779
14			100,431	0	3,962	0	104,394	0	69,016	36,740,796
15	5,000		102,942	0	4,141	0	107,083	3,209	68,732	36,812,737
16			105,516	0	4,327	0	109,843	0	68,450	36,881,187
17			108,154	0	4,522	0	112,675	0	68,170	36,949,358
18			110,857	0	4,725	0	115,582	0	67,893	37,017,250
19			113,629	0	4,938	0	118,567	0	67,617	37,084,867
20	5,000		116,470	0	5,160	0	121,629	2,768	67,343	37,154,979

<b>20-Year Present Worth</b>	<b>37,154,979</b>
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Main Water Distribution System	
Initial Cost	35,746,650
20-Year Present Worth	37,154,979
Average Annual Cost	97,191

### Notes

Valve/hydrant repairs every 5 years

Town of Campbell /Village of French Island  
Independent Water System  
Engineering Evaluation

**Hiawatha Distribution System**  
**INDEPENDENT WATER SYSTEM DEVELOPMENT**  
**OPINION OF PROBABLE PROJECT COST**

ITEM	Units	Quantity	Unit Cost (\$)	Initial Cost (\$)
<b>Distribution</b>				
Traffic Control	LS	1	30,000	30,000
HMA Pavement	Ton	2,500	130	325,000
CABC, 9"	Ton	4,800	25	120,000
Subgrade preparation	SY	12,700	2.5	31,750
Saw cutting	LF	1,500	3.0	4,500
Watermain, 10" trenched	LF	1,400	170	238,000
Watermain, 8" trenched	LF	4,700	150	705,000
Watermain, 6" trenched	LF	1,100	140	154,000
Watermain, 8" directionally drilled river crossing	LF	1,100	320	352,000
Valve & box, 10"	EA	3	4,400	13,200
Valve & box, 8"	EA	13	3,000	39,000
Valve & box, 6"	EA	20	2,200	44,000
Hydrant	EA	16	6,500	104,000
Hydrant lead, 6"	EA	240	140	33,600
Fittings (included in piping)	LB	0	15	0
<b>Services</b>				
Corporation stop, 1"	EA	74	350	25,900
Curb stop and box, 1"	EA	74	350	25,900
HDPE Service Pipe, 1"	LF	2,400	40	96,000
Subtotal				2,341,850
Contingency			20%	470,000
Subtotal				2,811,850
<b>Total Construction Cost</b>				<b>2,811,850</b>
Engineering			0%	252,000
<b>Total Initial Cost</b>				<b>3,063,850</b>

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Hiawatha Distribution System

### Present Worth Analysis Factors

Discount Rate	3.000%
Short Term Inflation Rate	3.5%
Long-term Inflation Rate	2.5%
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	4.0%
Electricity (6-20 years)	2.0%
Equipment	2.0%
Chemicals	3.0%

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)
Long Term Inflation Rate based on 10-year CPI average
National Institute of Standards, Annual Supplement to NIST Handbook 135
Electricity Escalation Rate = 2%
Natural Gas Escalation Rate = 2%
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		3,063,850								
Year (n)	Periodic Costs		Annual Operational Costs					PW Periodic	PW Annual	PW Cumulative
	Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual			
0			2,764	0	90	0	2,854			3,063,850
1			2,861	0	95	0	2,956	0	2,870	3,066,720
2			2,961	0	100	0	3,061	0	2,886	3,069,605
3			3,065	0	106	0	3,170	0	2,901	3,072,507
4			3,172	0	111	0	3,284	0	2,917	3,075,424
5	2,500		3,283	0	118	0	3,401	2,157	2,933	3,080,514
6			3,365	0	123	0	3,488	0	2,921	3,083,435
7			3,449	0	128	0	3,578	0	2,909	3,086,344
8			3,535	0	134	0	3,670	0	2,897	3,089,241
9			3,624	0	140	0	3,764	0	2,885	3,092,126
10	2,500		3,714	0	147	0	3,861	1,860	2,873	3,096,859

10-Year Present Worth	3,096,859
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Hiawatha Distribution System	
Initial Cost	3,063,850
10-Year Present Worth	3,096,859
Average Annual Cost	3,673

### Notes

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# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Hiawatha Distribution System

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		3,063,850								
Year (n)	Periodic Costs		Annual Operational Costs					PW Periodic	PW Annual	PW Cumulative
	Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual			
0			2,764	0	90	0	2,854			3,063,850
1			2,861	0	95	0	2,956	0	2,870	3,066,720
2			2,961	0	100	0	3,061	0	2,886	3,069,605
3			3,065	0	106	0	3,170	0	2,901	3,072,507
4			3,172	0	111	0	3,284	0	2,917	3,075,424
5	2,500		3,283	0	118	0	3,401	2,157	2,933	3,080,514
6			3,365	0	123	0	3,488	0	2,921	3,083,435
7			3,449	0	128	0	3,578	0	2,909	3,086,344
8			3,535	0	134	0	3,670	0	2,897	3,089,241
9			3,624	0	140	0	3,764	0	2,885	3,092,126
10	2,500		3,714	0	147	0	3,861	1,860	2,873	3,096,859
11			3,807	0	153	0	3,961	0	2,861	3,099,721
12			3,903	0	160	0	4,063	0	2,849	3,102,570
13			4,000	0	167	0	4,167	0	2,838	3,105,408
14			4,100	0	175	0	4,275	0	2,826	3,108,234
15	2,500		4,203	0	183	0	4,385	1,605	2,815	3,112,653
16			4,308	0	191	0	4,499	0	2,803	3,115,457
17			4,415	0	199	0	4,615	0	2,792	3,118,249
18			4,526	0	208	0	4,734	0	2,781	3,121,030
19			4,639	0	218	0	4,857	0	2,770	3,123,799
20	2,500		4,755	0	228	0	4,982	1,384	2,759	3,127,942

<b>20-Year Present Worth</b>	<b>3,127,942</b>
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Hiawatha Distribution System	
Initial Cost	3,063,850
20-Year Present Worth	3,127,942
Average Annual Cost	4,439

### Notes

Compressor Replacement at Year 15

Town of Campbell /Village of French Island  
Independent Water System  
Engineering Evaluation

**Meters & Metering/Billing**  
**INDEPENDENT WATER SYSTEM DEVELOPMENT**  
OPINION OF PROBABLE PROJECT COST

ITEM	Units	Quantity	Unit Cost (\$)	Initial Cost (\$)
<b>Meters</b>				
5/8" Meters	EA	1,610	500	805,000
1" Meters	EA	40	800	32,000
1-1/2" Meters	EA	27	2,250	60,750
3" meters	EA	4	3,000.0	12,000
Reader/software	EA	1	60,000	60,000
Subtotal				969,750
Contingency			20%	190,000
Subtotal				1,159,750
<b>Total Construction Cost</b>				<b>1,159,750</b>
Engineering			0%	101,000
<b>Total Initial Cost</b>				<b>1,260,750</b>

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Meters & Metering/Billing

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		1,260,750								
Year (n)	Periodic Costs		Annual Operational Costs					PW Periodic	PW Annual	PW Cumulative
	Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual			
0			144,005	0	0	0	144,005			1,260,750
1			149,045	0	0	0	149,045	0	144,704	1,405,454
2			154,262	0	0	0	154,262	0	145,406	1,550,860
3			159,661	0	0	0	159,661	0	146,112	1,696,972
4			165,249	0	0	0	165,249	0	146,821	1,843,794
5			171,033	0	0	0	171,033	0	147,534	1,991,328
6			175,308	0	0	0	175,308	0	146,818	2,138,146
7			179,691	0	0	0	179,691	0	146,105	2,284,251
8			184,183	0	0	0	184,183	0	145,396	2,429,647
9			188,788	0	0	0	188,788	0	144,690	2,574,337
10	15,000		193,508	0	0	0	193,508	11,161	143,988	2,729,487

### 10-Year Present Worth

**2,729,487**

Meters & Metering/Billing		
Initial Cost		1,260,750
10-Year Present Worth		2,729,487
Average Annual Cost		172,823

### Notes

O & M costs include all administrative labor, all employee benefits, office supplies and expenses; replacement cost is for meter software and reader updates

# Town of Campbell /Village of French Island Independent Water System Engineering Evaluation

## Meters & Metering/Billing

### Present Worth Analysis Factors

Discount Rate	<b>3.000%</b>
Short Term Inflation Rate	<b>3.5%</b>
Long-term Inflation Rate	<b>2.5%</b>
Escalation Rate (Above Inflation)	
Electricity (0-5 years)	<b>4.0%</b>
Electricity (6-20 years)	<b>2.0%</b>
Equipment	
Chemicals	<b>3.0%</b>

### Comments

Current Discount Rate for Federal Fiscal Year as established in NR 110 Wis. Administrative Code  
Short Term Inflation based on 5-year CPI average (assumed during first 5 years)  
Long Term Inflation Rate based on 10-year CPI average  
National Institute of Standards, Annual Supplement to NIST Handbook 135  
Electricity Escalation Rate = 2%  
Natural Gas Escalation Rate = 2%  
  
Chemical Escalation Rate = 3%

### Life Cycle Cost Analysis

Initial Cost		1,260,750								
Year (n)	Periodic Costs Replace	Salvage	O&M	Electricity	Sampling	Chemicals	Total Annual	PW Periodic	PW Annual	PW Cumulative
0			144,005	0		0	144,005			1,260,750
1			149,045	0	0	0	149,045	0	144,704	1,405,454
2			154,262	0	0	0	154,262	0	145,406	1,550,860
3			159,661	0	0	0	159,661	0	146,112	1,696,972
4			165,249	0	0	0	165,249	0	146,821	1,843,794
5			171,033	0	0	0	171,033	0	147,534	1,991,328
6			175,308	0	0	0	175,308	0	146,818	2,138,146
7			179,691	0	0	0	179,691	0	146,105	2,284,251
8			184,183	0	0	0	184,183	0	145,396	2,429,647
9			188,788	0	0	0	188,788	0	144,690	2,574,337
10	15,000		193,508	0	0	0	193,508	11,161	143,988	2,729,487
11			198,345	0	0	0	198,345	0	143,289	2,872,775
12			203,304	0	0	0	203,304	0	142,593	3,015,369
13			208,387	0	0	0	208,387	0	141,901	3,157,270
14			213,596	0	0	0	213,596	0	141,212	3,298,482
15			218,936	0	0	0	218,936	0	140,527	3,439,009
16			224,409	0	0	0	224,409	0	139,845	3,578,853
17			230,020	0	0	0	230,020	0	139,166	3,718,019
18			235,770	0	0	0	235,770	0	138,490	3,856,509
19			241,664	0	0	0	241,664	0	137,818	3,994,327
20	15,000		247,706	0	0	0	247,706	8,305	137,149	4,139,781

<b>20-Year Present Worth</b>	<b>4,139,781</b>
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Meters & Metering/Billing	
Initial Cost	1,260,750
20-Year Present Worth	4,139,781
Average Annual Cost	198,643

### Notes

Compressor Replacement at Year 15

## Appendix 3

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### **Costs by PSC Account**

<i>Expense Group--</i>	<i>USOA No.</i>	<i>Account</i>	<i>Revised Cost</i>	<i>PER Cost</i>
Intangible Plant	301	Organization		\$ -
	302	Franchises and Consents		\$ -
	303	Miscellaneous Intangible Plant		\$ -
Source of Supply Plant	310	Land and Land Rights		\$ -
	311	Structures and Improvements	\$ 199,980	\$ 382,263
	312	Collecting and Impounding Reservoirs		\$ -
	313	Lake, Rivers, and Other Intakes		\$ -
	314	Wells and Springs	\$ 1,459,402	\$ 2,428,411
	316	Supply Mains	\$ 31,743	\$ -
	317	Other Water Source Plant		\$ -
Pumping Plant	320	Land and Land Rights		\$ -
	321	Structures and Improvements (includes electrical upgrades)		\$ -
		Other Power Production Equipment (includes backup power / generator)	\$ 400,000	\$ 115,172
	323			
	325	Electric Pumping Equipment	\$ 397,281	\$ 147,164
	326	Diesel Pumping Equipment		\$ -
Water Treatment Plant	328	Other Pumping Equipment		\$ -
	330	Land and Land Rights		\$ -
	331	Structures and Improvements	\$ 13,999,451	\$ 10,666,188
	332	Sand or Other Media Filtration Equipment	\$ 3,566,509	\$ 3,391,170
	333	Membrane Filtration Equipment		\$ -
Transmission and Distribution Plant	334	Other Water Treatment Equipment (includes chemical feed equipment)	\$ 747,646	\$ 362,152
	340	Land and Land Rights		\$ 233,022
	341	Structures and Improvements		\$ 14,849,272
	342	Distribution Reservoirs and Standpipes	\$ 5,208,000	\$ 3,823,399
	343	Transmission and Distribution Mains	\$ 31,271,409	\$ 21,265,041
	345	Services	\$ 4,455,626	\$ 3,522,311
	346	Meters	\$ 1,260,750	\$ 1,288,775
	348	Hydrants	\$ 3,083,465	\$ 1,501,356
General Plant	349	Other Transmission and Distribution Plant		\$ -
	389	Land and Land Rights		\$ -
	390	Structures and Improvements (includes utility garage and office)		\$ -
	391	Office Furniture and Equipment	\$ 66,046	\$ 31,992
	391.1	Computer Equipment	\$ 33,023	\$ -
	392	Transportation Equipment		\$ -
	393	Stores Equipment		\$ -
	394	Tools, Shop and Garage Equipment		\$ -
	395	Laboratory Equipment	\$ 33,023	\$ -
	396	Power Operated Equipment		\$ -
	397	Communication Equipment		\$ -
	397.1	SCADA Equipment	\$ 924,651	\$ 767,812
	398	Miscellaneous Equipment		\$ -
Total			\$ 67,138,004	\$ 64,775,500



<i>Expense Group</i>	<i>USOA No.</i>	<i>Account</i>	<i>Revised Cost</i>	<i>PER Cost</i>
Source of Supply Expenses – Operation	600	Operation Labor	\$ 1,600	\$0
	601	Purchased Water		\$0
	602	Operation Supplies and Expenses	\$ 2,074	\$17,000
Source of Supply Expenses – Maintenance	605	Maintenance of Water Source Plant	\$ 10,000	\$0
Pumping Expenses - Operation	620	Operation Labor	\$ 46,750	\$0
	621	Fuel for Power Production		\$0
	622	Fuel or Power Purchased for Pumping	\$ 98,380	\$57,000
	623	Operation Supplies and Expenses		\$0
Pumping Expenses – Maintenance	625	Maintenance of Pumping Plant	\$ 2,000	\$0
Water Treatment Expenses – Operation	630	Operation Labor	\$ 63,910	\$0
	631	Chemicals	\$ 45,000	\$29,000
	632	Operation Supplies and Expenses	\$ 17,000	\$0
Water Treatment Expenses – Maintenance	635	Maintenance of Water Treatment Plant	\$ 57,750	\$11,000
Transmission and Distribution Expenses – Operation	640	Operation Labor	\$ 2,600	\$0
	641	Operation Supplies and Expenses	\$ 3,330	\$0
Transmission and Distribution Expenses – Maintenance	650	Maintenance of Distribution Reservoirs and Standpipes	\$ 4,100	\$0
	651	Maintenance of Mains	\$ 58,427	\$0
	652	Maintenance of Services	\$ 7,047	\$0
	653	Maintenance of Meters		\$0
	654	Maintenance of Hydrants	\$ 5,000	\$0
	655	Maintenance of Other Plant		\$0
Customer Accounts Expenses – Operation	901	Meter Reading Labor	\$ 30,000	\$0
	902	Accounting and Collecting Labor		\$0
	903	Supplies and Expenses		\$0
	904	Uncollectible Amounts		\$0
	906	Customer Service and Informational Expenses		\$0
Sales Expenses - Operation	910	Sales Expenses		\$0
Administrative and General Expenses - Operation	920	Administrative and General Salaries	\$ 23,005	\$138,000
	921	Office Supplies and Expenses	\$ 6,000	\$6,000
	922	Administrative Expenses Transferred – Credit		\$0
	923	Outside Services Employed	\$ 14,000	\$14,000
	924	Property Insurance	\$ 6,000	\$17,000
	925	Injuries and Damages		\$0
	926	Employee Pensions and Benefits	\$ 95,000	\$92,000
	928	Regulatory Commission Expenses		\$6,000
	930	Miscellaneous General Expenses		\$3,000
Administrative and General Expenses - Maintenance	933	Transportation Expenses		\$6,000
	935	Maintenance of General Plant		\$0
Total Annual Operating Expenses for the Proposed Project:			\$598,973	\$396,000

## **Attachment 8**

### **Wisconsin Policy Forum Report – Something in Common**

#### **Exploring Fire and EMS Service Sharing Opportunities in the La Crosse County Region**

Inserted on subsequent page(s).

# something in common

*Exploring Fire and EMS Service Sharing  
Opportunities in the La Crosse County Region*



WISCONSIN  
**POLICY FORUM**

## **ABOUT THE WISCONSIN POLICY FORUM**

The Wisconsin Policy Forum was created on January 1, 2018, by the merger of the Milwaukee-based Public Policy Forum and the Madison-based Wisconsin Taxpayers Alliance. Throughout their lengthy histories, both organizations engaged in nonpartisan, independent research and civic education on fiscal and policy issues affecting state and local governments and school districts in Wisconsin. WPF is committed to those same activities and that spirit of nonpartisanship.

## **PREFACE AND ACKNOWLEDGMENTS**

This report was undertaken to provide citizens and policymakers in La Crosse County and its surrounding region with information on the state of fire and EMS service provision across the region and options for collaboratively addressing future challenges. The intent was to lay out programmatic data, illustrate key challenges, and discuss options for improvement, but not to make recommendations on the future of fire and EMS services for individual communities.

Report authors would like to thank fire chiefs, public and private sector EMS directors, the county dispatch office, and county and municipal administrators for their assistance in providing information, and for patiently answering our questions.

In addition, we wish to acknowledge and thank La Crosse County and the La Crosse Area Planning Committee for jointly commissioning and underwriting much of the cost of this research; and the University of Wisconsin-La Crosse for funding and helping to organize preliminary planning meetings in the summer of 2019 that precipitated this study.



# SOMETHING IN COMMON

*Exploring Fire and EMS Service Sharing Opportunities  
in the La Crosse County Region*

December 2020

**Study authors:**

**Davida Amenta, Wisconsin Policy Forum Researcher**  
**Chris Paul, Wisconsin Policy Forum Research Intern**  
**John Kovari, University of Wisconsin-La Crosse**  
**Rob Henken, Wisconsin Policy Forum President**

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# INTRODUCTION

It is at times of crisis that citizens recognize more than ever the value of highly-functioning emergency response departments and systems. During such times, exemplified by the current COVID-19 pandemic, not only is it critical to have sufficient numbers of well-trained personnel and appropriate equipment, but the value of cooperation and coordination among neighboring public safety and health agencies also becomes more pronounced.

Even before the pandemic, efforts to explore enhanced service sharing and cooperation among regional fire and emergency medical services (EMS) providers were becoming more common in Wisconsin and across the nation. For example, the North Shore Fire Department in Milwaukee County has received national attention as an example of a highly successful consolidated fire department that has seen improved service at a lower cost since its creation in 1995. The South Shore Fire Department in Racine County and Western Lakes Fire District in Waukesha County also have demonstrated the benefits that can accrue from fire and rescue consolidation. Other communities have stopped short of consolidation but have developed strong mutual and automatic aid agreements among neighboring jurisdictions.

One reason for the increased attention to service sharing in Wisconsin is the strict property tax levy limits facing municipalities and the substantial share of municipal budgets devoted to fire and EMS services, which have threatened the ability of many communities to keep up with growing service demands. Yet, while service sharing may provide opportunities for fiscal savings from economies of scale, the Wisconsin Policy Forum has found that a more compelling rationale is the potential for municipalities to *enhance* service levels and keep up with capital needs at a cost that would be far lower than if they attempted to do so individually.

For smaller communities in particular, service sharing or consolidation may offer an opportunity to secure full-time fire and EMS service capacity for a price tag that would not be affordable if pursued independently. Meanwhile, for larger communities facing service expansion demands, such strategies may offer the opportunity to spread the cost of such expansion while providing a higher level of service across a broader geographic area.

La Crosse County and the La Crosse Area Planning Committee (LAPC) jointly commissioned this report to explore options for enhanced service sharing and consolidation of services among the various fire departments and EMS providers in La Crosse County, as well as in the neighboring city of La Crescent in Minnesota. The decision to do so followed two initial planning meetings of the LAPC that were sponsored and financially supported by the University of Wisconsin-La Crosse. At those meetings, municipal leaders and public and private sector fire and EMS officials were invited to discuss the need for such a project and its scope.

Subsequently, at the request of the county administrator, participants were asked to indicate whether they would like to participate in the study. Those that elected to do so comprise most of the municipal fire and EMS providers in the county and are listed below:



- City of La Crosse
- City of La Crescent
- City of Onalaska
- Village of Holmen
- Town of Farmington
- Town of Holland
- Town of Medary
- Town of Onalaska
- Town of Shelby
- Town of Washington
- Brice Prairie First Responders
- Tri-State Ambulance

The rationale for exploring fire and EMS service sharing and consolidation options in La Crosse County includes growing demands for service in parts of the region marked by increased development and population growth; challenges with current staffing models (including difficulty with recruitment and retention of paid-on-call firefighters); and a desire to consider cooperative approaches with regard to possible new stations or other service enhancements.

The analysis was conducted with the participation of administrators and fire chiefs from each of the participants and the county. In fact, while not endorsing any specific approach, the chiefs from the five participating fire departments met regularly with Forum researchers throughout the study process to share information and discuss operational details of various service sharing options.

In the pages that follow, we lay out the results of our analysis. It is important to note that its purpose was not to recommend a specific consolidation approach and implementation plan. Instead, we present a range of potential options and provide sufficient analysis to hopefully allow decision-makers to determine which (if any) should be considered for more detailed study and implementation.



# CHARACTERISTICS OF THE PARTICIPATING MUNICIPALITIES

This section gives a brief overview of demographic characteristics of the study participants that are relevant to fire and EMS services. For some of our analysis, we also include the town of Campbell – which elected not to participate – in light of its proximity to the study participants; and the town of Greenfield, which is covered by the Shelby Fire Department.

The communities within the study area include urban areas, urbanizing areas, and areas that remain essentially rural. Generally speaking, population and employment are concentrated most heavily in the cities along the Mississippi river, in particular the city of La Crosse. New development is constrained in La Crosse since the city has less available land. Population growth is most pronounced in the northern parts of the study area, in particular around the village of Holmen.

## General Demographic Characteristics

**Table 1** shows population trends between 2010 and 2019. While population is highly concentrated in La Crosse, growth in the city has been slow in comparison with northern suburbs. Holmen, Onalaska, Farmington, and Holland have all experienced significant growth since 2010. With the exception of Greenfield, population growth in the southern part of the region has been slower.

**Table 1: 2010-2019 population change by municipality\***

Central Urban Area Municipality	2019 Population	2010 to 2019 Change	2010 to 2019 % Change
Holmen	10,204	1,749	20.8%
Onalaska	18,988	1,851	10.8
La Crosse	52,197	965	1.9%
La Crescent (MN)	5,107	277	5.7%
Surrounding Towns			
Farmington	2,119	338	20.3%
Holland	4,216	661	18.6%
Onalaska	5,816	262	4.7%
Medary	1,524	-255	-14.3%
Campbell	4,316	16	0.4%
La Crescent (MN)	1,115	-331	-22.9%
Shelby	4,750	50	1.1%
Greenfield	2,132	322	18.4%

Source: 2019 Population Estimates from WI DOA Municipality Final Population Estimates, 2018 Populations from MN DOA Population Finder for Cities and Townships, 2010 Census Estimates

\* This table, like most others in this section, lists municipalities from north to south

As shown in **Table 2**, projections of population growth by the Wisconsin Department of Administration show that these trends are likely to continue, with growth rates of more than 25% in Holland,



Onalaska, and Holmen. Little to no growth is projected for La Crosse. Greenfield is also projected to experience more than a 25% increase in population.<sup>1</sup>

**Table 2: Population projections**

Central Urban Area Municipality	2019 Population	2040 Projection	% Change (2019 to 2040)
Holmen	10,204	13,400	31.3%
Onalaska	18,988	23,570	24.1%
La Crosse	52,197	51,850	-0.7%
<b>Surrounding Towns</b>			
Farmington	2,119	2,535	19.6%
Holland	4,216	5,500	30.5%
Onalaska	5,816	6,485	11.5%
Medary	1,524	1,630	7.0%
Campbell	4,316	4,315	0.0%
Shelby	4,750	4,665	-1.8%
Greenfield	2,132	2,715	27.3%

Source: 2019 Population Estimates from WI DOA Municipality Final Population Estimates, WI DOA Municipal Population Projections 2010 to 2040

Because the highest users of EMS services are people over the age of 65, **Table 3** shows the senior populations for each community. Again, there is some distinction between northern and southern parts of the region, with some northern municipalities showing lower percentages of citizens age 65 and older and some southern parts showing higher percentages. La Crosse has a relatively low senior citizen population at 13.5%, but the city also has a large college student population.

**Table 3: Median age and population age 65+**

Central Urban Area Municipality	2017 Total Population	65+	% 65+	Median Age
Holmen	9,693	1,082	11.2%	35.4
Onalaska	18,452	3,429	18.6%	41.5
La Crosse	51,928	6,987	13.5%	28.3
La Crescent	5,046	939	18.6%	40.6
<b>Surrounding Towns</b>				
Farmington	2,255	348	15.4%	38.3
Holland	3,804	405	10.6%	38.5
Onalaska	5,690	763	13.4%	41.9
Medary	1,589	307	19.3%	48.5
Campbell	4,370	851	19.5%	46.1
La Crescent	1,116	250	22.4%	53.5
Shelby	4,847	1,048	21.6%	47.8
Greenfield	2,087	317	15.2%	42.6

Source: US Census American Community Survey Age and Sex, 2017 5 YR Estimate

<sup>1</sup> We were unable to obtain population projections for Minnesota cities and towns so the city and town of La Crescent are not included in the table. Similarly, where the La Crescent communities are not included in subsequent tables it was because of an inability to secure the data in question for those municipalities.



**Table 4** shows population projections for persons aged 65+ for all of La Crosse County. The senior population is projected to increase by almost 40% between 2020 and 2040 countywide.

**Table 4: County age 65+ projections**

Year	65+ Population Projection
2020	22,170
2025	25,950
2030	28,840
2035	30,370
2040	30,990
<b>% Change 2010 - 2040</b>	<b>39.78%</b>

Source: WI DOA County Age-Sex Population Projections 2010-2040 (2013)

Fire departments report that senior housing facilities can account for a large proportion of EMS calls.

**Table 5** details the number of senior housing facilities, including residential care facilities and apartment complexes, in each of the municipalities.<sup>2</sup> La Crosse has the most nursing homes and other senior residences while Onalaska also houses a high number of other senior residences.

**Table 5: Senior facilities by municipality**

Municipality	Nursing Homes	Other Senior Residences	Total Beds <sup>3</sup>
Holmen	0	5	161
City of Onalaska	1	12	502
La Crosse	4	15	883
City of La Crescent	1	2	N/A

Source: WI DHS, MDH

## Relevant Housing and Other Characteristics

The prevalence of higher density housing, such as apartment buildings, also impacts how fire protection services are organized. **Table 6** shows the number of residential buildings in each community that exceed both three and 20 units. La Crosse, as home to three higher education institutions,<sup>4</sup> has a significantly larger percentage of multi-unit housing. Outside of the central urban area, prevalence of multi-unit housing is very low, with the exception of Campbell.

<sup>2</sup> Municipalities not listed do not have either nursing homes or other senior residences in their municipality.

<sup>3</sup> Minnesota Department of Health (MDH) does not keep record of total beds in nursing homes and senior residences like WI DHS

<sup>4</sup> The University of Wisconsin-La Crosse has about 10,600 enrollees, Western Technical College has about 4,000, and Viterbo University has about 2,700.



**Table 6: Housing units by municipality**

Central Urban Area Municipality	Estimated Total Units	3 to 19 units	20 + Units	Total: 3+	3+ Units as a % of Total
Holmen	3,819	439	144	583	15.3%
Onalaska	8,255	956	673	1,629	19.7%
La Crosse	22,405	3,992	3,504	7,496	33.5%
La Crescent	2,244	321	39	360	16.0%
<b>Surrounding Towns</b>					
Farmington	891	13	6	19	2.1%
Holland	1,294	0	0	0	0.0%
Onalaska	2,071	26	0	26	1.3%
Medary	663	0	0	0	0.0%
Campbell	2,132	400	34	434	20.4%
La Crescent	472	0	0	0	0.0%
Shelby	2,215	30	0	30	1.4%
Greenfield	802	3	10	13	1.6%

Source: US Census: American Community Survey, House Characteristics - Units in Structure 5 - Year Estimates 2017

Commercial buildings also can present unique challenges in terms of fire protection. **Table 7** shows commercial property value as a percentage of each community's total assessed value to give a sense of the relative presence of commercial properties in each municipality. Commercial development is concentrated in the central urban area, especially in La Crosse and the city of Onalaska. La Crosse, as the commercial core of the region, particularly faces unique challenges in needing to be prepared to provide services to large daytime populations.

The table also shows per capita assessed value, which can be an indicator of ability to pay for public services such as fire and EMS protection. Many of the surrounding towns have much higher per capita assessed values than the municipalities in the central urban area, including La Crosse.

**Table 7: Commercial assessed value by municipality**

Central Urban Area Municipality	Total Assessed Value	Commercial % of Total Assessed Value	Per Capita AV
Holmen	\$ 771,084,100	21.9%	\$ 75,567
Onalaska	\$ 2,098,305,900	32.6%	\$ 110,507
La Crosse	\$ 4,022,713,300	38.4%	\$ 77,068
<b>Total</b>	<b>\$ 6,892,103,300</b>	<b>34.8%</b>	<b>\$ 84,681</b>
<b>Surrounding Towns</b>			
Farmington	\$ 186,316,700	1.4%	\$ 87,927
Holland	\$ 445,156,900	2.1%	\$ 105,588
Onalaska	\$ 617,582,600	5.7%	\$ 106,187
Medary	\$ 185,765,400	5.0%	\$ 121,893
Campbell	\$ 355,848,700	15.0%	\$ 82,449
Shelby	\$ 465,787,900	4.6%	\$ 98,061
Greenfield	\$ 182,691,100	3.3%	\$ 85,690
<b>Total</b>	<b>\$ 2,439,149,300</b>	<b>5.6%</b>	<b>\$ 98,064</b>

Source: Wisconsin DOR Equalized Value 2019, WI DOA Municipality Final Population Estimates 2019





Finally, our discussions with fire chiefs revealed that manufactured homes (i.e. homes that are typically built in factories and transported to a site as opposed to on a permanent foundation) can be a high source of fire and EMS calls for service in light of their high population density. **Table 8** shows that manufactured homes parks are found in almost all of the municipalities in the study area but are particularly concentrated in areas served by the Holmen Area Fire Department. Shelby and Greenfield, which are both served by the Shelby Fire Department, also have a higher concentration of manufactured housing.

**Table 8: Manufactured homes and home parks**

Central Urban Area Municipality	Manufactured Home Parks	Total Homes
Holmen	6	470
Onalaska	5	417
La Crosse	4	325
Surrounding Towns		
Farmington	1	10
Holland	1	87
Onalaska	0	0
Medary	1	25
Campbell	2	58
Shelby	4	268
Greenfield	2	144

## Summary

This brief review of demographic and other indicators shows patterns that are somewhat typical of a region with a dominant central city, in this case La Crosse, as well as surrounding suburbs and outlying rural areas. La Crosse is characterized by higher population and housing densities and by a concentration of commercial activity. The location of the University of Wisconsin-La Crosse, Western Technical College, and Viterbo University within the city – as well as the Mayo and Gundersen health systems – also contributes to its central role in the region.

As a more mature urban area, growth in La Crosse is not a significant factor in terms of future fire and EMS services. The suburban or urbanizing areas, particularly in the north, are where population growth has been concentrated and where it is projected to continue to occur over the next two decades.

The study area also includes places that could be characterized as rural, such as Farmington, La Crescent, and Shelby, which have markedly different demographic profiles of older, wealthier residents and much lower population densities.



# OVERVIEW OF PARTICIPATING AGENCIES

The eight agencies that participated in the study include five fire departments, two EMS-only nonprofit agencies, and a private ambulance company. “Snapshot” descriptions of each of the agencies can be found in **Appendix I**.

The five fire departments range from a large department in La Crosse that is comprised entirely of full-time “career” employees to fire departments that rely exclusively on volunteers who are paid on an hourly basis or via stipend. The fire departments are responsible for fire suppression, prevention, inspection, special rescue, and other fire services, as well as first responder emergency medical services (EMS).

Two of the agencies (in Brice Prairie and Farmington) only provide EMS first response while a third – Tri-State Ambulance – is a private nonprofit agency (and subsidiary of Gundersen Health System) that contracts with municipalities through the Joint City/County Emergency Medical Services Commission to provide paramedic-level response and ambulance transport. Departments that provide EMS first response typically use individuals who are licensed as Emergency Medical Responders (EMRs) or basic Emergency Medical Technicians (EMTs), while agencies providing advanced life support (ALS) services typically use licensed Advanced EMTs (AEMTs) or paramedics (see text box on p. 12 for description of various types of licensed EMS staff).

**Table 10** provides an overview of the types and variety of agencies that are included in this study,<sup>5</sup> while **Map 1** shows where their stations are located. The volunteer fire departments from Campbell, Bangor Burns, Farmington, West Salem, and Coon Valley and EMS-only agencies from Campbell, Bangor, Coon Valley, and West Salem elected not to participate.

**Table 10: Department and agency characteristics**

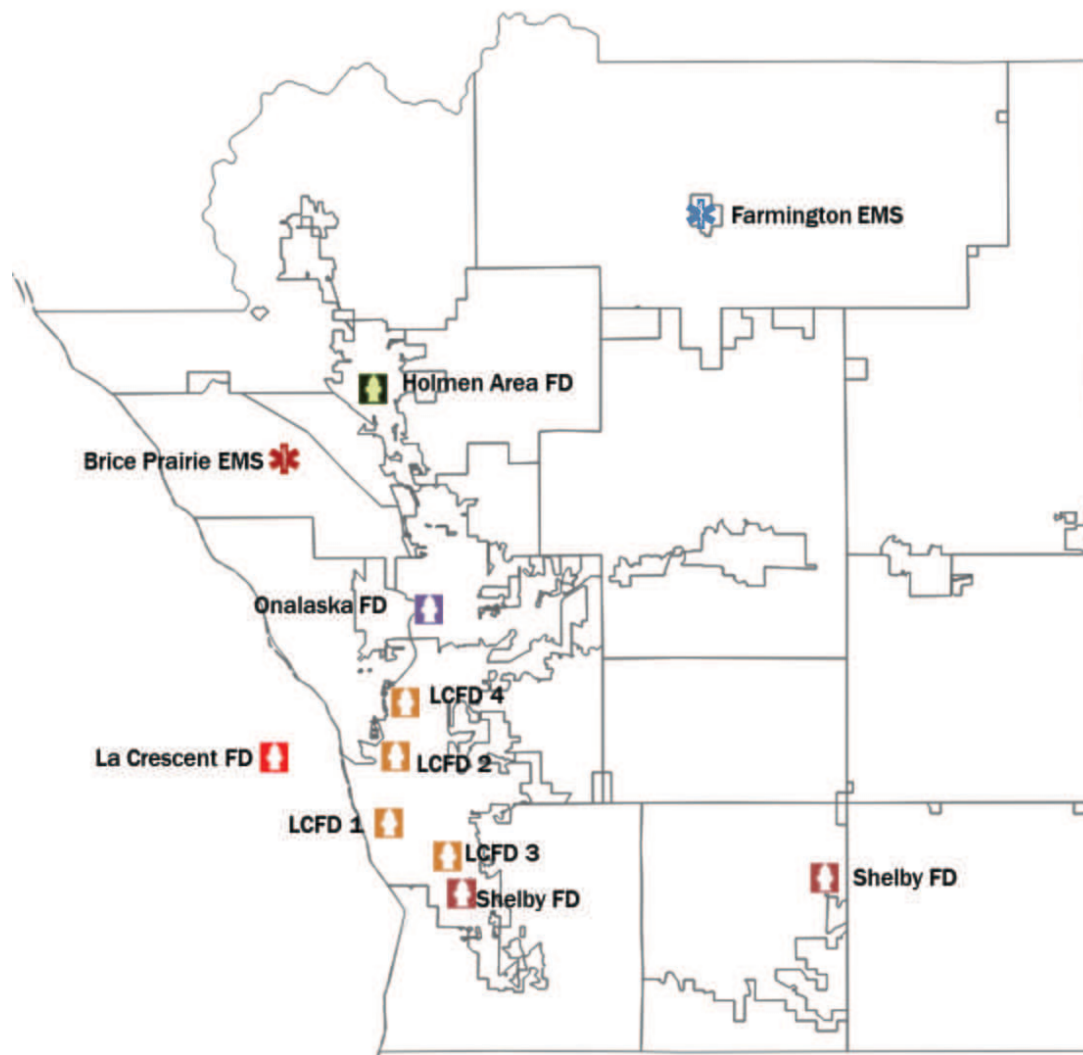
Department/Agency	Type	Staffing	EMS/Fire
La Crosse City Fire	Municipal Dept.	Career	Fire/First response ALS
Onalaska City Fire	Municipal Dept.	Career and PT	Fire/First response EMT
Shelby Fire	Municipal Dept.	POC	Fire/First response EMR
Holmen Area Fire	Independent District	Career and PT	Fire/First response EMR*
City of La Crescent Fire	Municipal Dept.	POC	Fire/First response EMR
Brice Prairie EMS	Nonprofit	Volunteer	First response EMR
Farmington Emergency Medical Team	Nonprofit	Volunteer	First response EMR*
Tri-State Ambulance	Nonprofit	Career and PT	ALS and transport for entire county

\* The Holmen Area and Farmington departments are transitioning from EMR to EMT

<sup>5</sup> The source for this and all subsequent tables and charts (unless otherwise noted) is information provided directly by the departments in our survey instrument or publicly available information obtained from their websites.



**Map1: Station Locations**



The map shows that La Crosse is served by four stations,<sup>6</sup> the Shelby area (consisting of both the towns of Shelby and Greenfield) is served by two, and the other three fire departments operate out of one station. Given the size of the geographic area served by the Holmen Area Fire Department (which includes the village of Holmen, town of Holland, and part of the town of Onalaska) and population growth in the northern part of its service area, officials have acknowledged that a second station may need to be considered. Meanwhile, La Crosse has already initiated planning for a fifth station in the southern part of the city and both La Crosse and Onalaska have cited a possible need

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<sup>6</sup> There is also a station at the La Crosse Regional Airport that exists solely to serve the airport. In 2019, an agreement was reached to have the La Crosse FD take over emergency response by staffing the station with one firefighter/EMT. The airport station has one fire and rescue vehicle that can pump water and foam. Also, La Crosse provides service under contract to the town of Medary.

to consider an additional station in the Valley View area in the northern part of La Crosse or southern part of Onalaska (with potential to develop a shared station).

As seen in **Table 10**, there is a variation in staffing models between the agencies in this study. La Crosse is a career department with 98 full-time equivalent employees (FTEs) who staff an average of 25 shifts each day at four stations. La Crosse also is the only municipal department licensed to provide paramedic-level EMS. Onalaska and Holmen are combination departments, meaning they employ some career staff but also use staff paid on an hourly basis.

Part-time staff can either serve as paid-on-call (POC), which means they are called in from their home or workplace when needed for a response and paid on an hourly basis; or paid-on-premise (POP), which means they are part-time, hourly employees but work out of a station as part of a regular shift. Shelby and La Crescent operate almost entirely with POC staff. Brice Prairie and Farmington EMS are staffed with part-time volunteers who do not receive pay.

**Table 11** provides additional details on the staffing levels and composition of each department. The size of the POC roster is important for those who rely on this model, and particularly for those that are facing rising call volumes. Both Shelby and La Crescent have large rosters, which position them well for the future, but other departments reported recruitment challenges. This is an issue faced by many departments in Wisconsin in light of low unemployment levels (prior to the pandemic) and other workforce and demographic factors. Risks related to COVID-19 may also have reduced the pool of volunteers.

The table also reveals the relatively low staffing level of the Holmen Area Fire Department. As we will discuss below, that department is facing a sharp increase in call volumes and now fields about two thirds as many calls annually as the Onalaska department but has less than half of its FTEs.

In its La Crosse market, Tri-State staffs six ambulances during the day with two staff each and has two back-up ambulances available. Between 10 PM and 6 AM there are four ambulances in service and one paramedic supervisor in an SUV for paramedic support. Tri-State also provides inter-facility transport in La Crosse County. Non-emergency transports represent a significant source of revenue for Tri-State which helps to subsidize the cost of EMS response.

## EMS LICENSE LEVELS

**Emergency Medical Responder** - EMRs are trained to provide non-invasive first aid. This includes clearing airways manually, CPR, controlling bleeding, and taking vital signs. EMRs are trained in the use of portable defibrillator devices.

**Emergency Medical Technician-Basic** - in addition to all of the skills of an EMR, EMT-Bs are trained to perform more invasive medical skills such as tracheotomies, and in the use of tourniquets and cervical collars. They are also able to administer oxygen and can provide more types of medications, including Narcan for opioid overdoses.

**Advanced EMT** - all of the skills of EMT-B, and in addition they can start an IV and can administer a wider range of medications.

**Paramedic** - all of the skills of Advanced EMT with the addition of invasive procedures such as using a needle for chest decompression and intubation. Paramedics are also able to administer the widest variety of medications.

Source: WI EMS Scope of Practice, Wisconsin Department of Health Services



**Table 11: Department staffing**

Department	Total FTE	POC Roster
Holmen FD	8.3	15
Onalaska FD	17.7	18
La Crosse FD	98.0	N/A
Shelby FD	2.3	43
La Crescent FD	2.3	27
Farmington EMS		17
Brice Prairie EMS		12
Tri-State Ambulance*	42	NA

\*Some employees work for more than one department; this is seen especially between Tri-State and the La Crosse FD.

It is important to recognize that there is no “right” or “wrong” staffing model, and each of the staffing models employed in La Crosse County may be perfectly suited to the particular community based on the needs and expectations of its residents. Whether career or part-time, each of these agencies responds to calls for emergency medical services and provides competent response under medical direction. Each of the fire departments also uses modern equipment to suppress all types of fires and provides regular training in both fire and EMS protocols. Although response times and some protocols may vary, no model is correct in all circumstances.

In the next section, we provide more detail on how the agencies included in this study conduct their operations and pay for them.



# SERVICE CHARACTERISTICS, EQUIPMENT, AND BUDGETS

In this section, we provide a more detailed look at the fire and EMS services provided by each of the participating departments by examining call volumes, response times, operating frameworks, apparatus, and budgets. This additional detail provides important insight into the similarities and differences between various departments that may suggest opportunities or barriers to enhanced service sharing. It also reveals various weaknesses or strengths that may impact future decision-making on the need for capacity-building and collaboration.

## Calls for service

**Table 12** shows total 2019 calls for service, while also breaking out EMS calls. For the five fire departments that provide both fire protection and EMS, EMS calls account for 73% of total calls.

**Table 12: 2019 calls for service**

	Total Calls	EMS Calls	Average Calls/Day
La Crosse FD	6,837	4,837	18.7
Onalaska FD	1,553	1,197	4.3
Holmen FD	1,057	779	2.9
Shelby FD	330	237	0.9
La Crescent FD	400	375	1.1
Farmington EMT	97	97	0.3
Brice Prairie EMT	97	70	0.3
Tri-State	9,116	9,116	25.0

Note: The data for Onalaska are from 2018. Also, the Tri-State calls are those originating through 911 in the study area.

As would be expected, La Crosse has the largest total call volume among the fire and EMS departments and accounts for about two thirds of public sector first responder calls in the study area. Tri-State responds to an average of 25 calls per day; its total “double counts” calls shown for the public sector agencies, as Tri-State responds to every EMS call in conjunction with municipal providers and is the only provider of ambulance transport.

Consideration of the number of calls per day helps explain the range of different staffing models across jurisdictions. In areas with less than one call per day, there would not be a financial justification for having two EMTs or fire crews available 24 hours per day, which means that a POC model may be reasonable and appropriate. Similarly, while city or suburban residents may expect an ambulance to arrive within five or six minutes, residents of rural areas residents may recognize that calls are infrequent and may find lengthier response times from a POC framework more acceptable.

But as call volumes increase, relying on POC response may result in staff burnout, response to pages may wane, and staff turnover may increase. As an interim measure, a fire department or EMS agency may consider staffing regular shifts using POP employees. Some municipalities with a low but growing call volume also have found ways to combine EMS response with other jobs such as police officers (village of Palmyra) or public works employees (village of Bristol).





**Table 13** shows that calls for service in the study area increased by about 15% from 2016-2019. There are several possible reasons for the increase, including population growth in the northern part of the study area. In La Crescent, a more important factor is likely the aging population. Fire chiefs also noted that there is more of a tendency among all population groups to call 911 for minor injuries and to use hospital emergency rooms for basic health care.

**Table 13: Calls for service trends, 2016 to 2019**

	2016 CFS	2019 CFS	% Change
Holmen FD	825	1,057	28.1%
Onalaska FD	1,458	1,596	9.5%
La Crosse FD	6,009	6,837	13.8%
Shelby FD	305	330	8.2%
La Crescent FD	310	400	29.0%
Farmington EMS	75	97	29.3%
Brice Prairie EMS	60	71	18.3%
Tri-State EMS	8,520	9,810	15.1%

Notes: Onalaska FD data is for 2015 through 2018. Also, the town of Medary switched to contracting with La Crosse from Onalaska/Shelby in 2018, reducing calls for those departments and increasing total calls for La Crosse.

**Table 14** shows some differences between departments in terms of per capita calls. Given that persons over age 65 tend to have the highest utilization of EMS, it is not surprising that La Crescent and Onalaska, both with more than 18% of their population over that age, have higher call rates. La Crosse, however, has a relatively low percentage of older residents and by far the highest rate of calls for service. One explanation may be the city's concentration of senior living facilities, which can generate a very high number of calls. La Crosse also has higher residential density and a variety of income levels, both of which are correlated with higher fire and EMS utilization. Finally, because La Crosse is an employment center, it has a higher daytime population than surrounding areas.

**Table 14: EMS calls for service per 1,000 population\***

	CFS/1,000 population
Holmen FD	39.6
Onalaska FD	68.1
La Crosse FD	94.6
Shelby FD	35.6
La Crescent FD	53.8
Farmington EMS	36.9
Brice Prairie EMS	35.5
Tri-State EMS	84.8

\* Per capita calculations for this and future tables use estimated service area populations for each department and do not necessarily reflect municipal populations.



The calls for service per 1,000 population figures for Tri-State are an average across the entire study area. Tri-State rates by municipality show a similar variation to that of first responders, particularly a higher rate of calls for service in La Crosse in comparison with outlying areas.

Finally, it is important to note that the difference in the rate of calls for service may be partially related to the way in which the data were reported. Some departments, for example, may have included cancelled calls or false alarms, while others did not.

#### *How the departments respond*

Outside of the city of La Crosse, a typical EMS response in La Crosse County is two-tiered. Calls for EMS are received by the county dispatch center, which dispatches first responders and then transfers the call to Tri-State. Tri-State triages the call and dispatches an ambulance. When appropriate, Tri-State dispatchers may also offer emergency medical dispatch (EMD), with trained dispatchers providing medical instructions to the caller at the scene. More specifically:

- First responders, generally at the EMR level, arrive at the scene to provide basic life support such as controlling bleeding, CPR, assisting someone who has fallen, etc.
- First responders are followed by the arrival of an advanced life support (ALS) ambulance from Tri-State, which is generally staffed with a combination of EMTs and paramedics, but at least one paramedic. Tri-State personnel can then take over patient care and if necessary they can provide higher-level ALS services.
- Once a patient is stabilized, first responders are released back to their station. Tri-State estimates that the average time on an EMS call for first responders is 30 minutes. Tri-State then transports the patient to the hospital, if necessary. Depending on the location of the incident, transport can mean that a Tri-State ambulance is unavailable for up to 90 minutes.

There are several advantages of the two-tiered EMS system. One is that fire department personnel and apparatus are not required to transport patients, allowing for lower staffing levels. Another is that the level of EMS care is standardized across most of the region and Tri-State coordinates training and medical direction for first responders.<sup>7</sup> Finally, the contract with Tri-State relieves first responders from the need to provide paramedic-level services, which would require an investment both on the part of employees to obtain that level of training and departments in terms of increased wages and training costs for paramedic-level employees.

Arguably, a disadvantage of the two-tiered system is that it potentially uses more resources since two agencies and four individuals (two from the municipal first responder and two from Tri-State) respond to EMS calls. For career fire departments that provide paramedic-level services, an EMS response generally involve both an engine and an ambulance; however, depending on the type and severity of the injury, the response may involve only two people and one vehicle. It is also worth noting that under the current model, reimbursement revenue for transports from Medicaid,

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<sup>7</sup> Tri-State coordinates continuing education training, but not training to receive the initial license.



Medicare, or private insurance goes entirely to Tri-State (though it still does not fully offset the cost of those calls), which leaves the departments with no revenue offset for first response services.

The two-tiered system also has created some specific challenges for the career department in La Crosse, which found it was losing employees to career departments in other counties that offered opportunities to develop and maintain skills as paramedics. As a result, Tri-State and the La Crosse FD have collaborated on a joint response model.

Thirteen paramedics who are employed by La Crosse FD also work voluntarily for Tri-State for 24 hours/month. They receive training through Tri-State and are certified by the same medical director. Because training and protocols are shared, if a La Crosse paramedic arrives first at the scene, he or she can begin paramedic-level response. When Tri-State arrives, patient care is seamlessly transferred from the La Crosse paramedic to Tri-State paramedics. This collaboration has benefitted the La Crosse FD because it supports a paramedic program for the department's career firefighters, while Tri-State benefits because La Crosse FD paramedics working part-time for Tri-State support its staffing needs.

It is worth noting that only a minority of EMS calls require ALS interventions. Consequently, one disadvantage of having too many paramedics in an area is that it decreases the number of calls that each paramedic handles each year, which diminishes opportunities for paramedics to maintain their skills. Tri-State management also notes that while ALS response is crucial to a small number of cases, the vast majority of patients are better served with appropriate BLS interventions within the first five minutes of an incident.

Fire response requires a much larger contingent of personnel than EMS response. For a typical house fire, a minimum response according to national standards is 16 firefighters and at least one ambulance. The La Crosse FD is the only department in the study area that can mount an immediate fire response with on-duty crews. For the other departments, a complete fire response will not begin until POC staff and/or firefighters from neighboring municipalities are on the scene. Smaller fires, such as car fires or dumpster fires, may be handled with a single engine and a lower number of staff.

### *Response times*

Response times are an important measure of level of service. In terms of EMS, the National Fire Protection Association (NFPA) identifies a first response standard of five minutes or less for BLS calls (from dispatch to arrival on the scene) for 90% of responses for career departments. The standard for ALS calls is nine minutes. For departments relying on part-time staff or in rural areas, lengthier average response times are expected. In the minority of cases where an ALS response is required, such as for strokes or cardiac events, receiving ALS services in a timely manner may truly be the difference between life and death. In terms of fires, a quicker response time means an enhanced ability to protect life and property.

Response times have two main components:

- Turnout time, or the time it takes to get into a truck ready to leave the station in full gear (for fire response). For POC departments, report time to the station must also be factored into turnout time.



- Travel time, or the time to get from the station to the incident. Travel time is a function of the geographic size of the overall service area and station locations.

Other components of response times are the dispatch call processing time and, in the case of major fires, the total effective response force arrival (i.e. the time it takes for the full cadre of firefighters required to respond to house or major structure fires to arrive on the scene).

Departments that have firefighting and first response staff working out of stations on shifts obviously are able to respond more quickly than departments that must call in part-time staff to respond. **Table 15** shows typical shift staffing (i.e. the number of non-command firefighters typically on duty at the station at any point in time) at the stations managed by La Crosse FD, Onalaska FD, and Holmen Area FD, which are the only stations that maintain regular shifts. **Table 16** shows average total response times for first responders as reported by the departments and agencies, which include both turnout time and travel time.<sup>8</sup>

**Table 15: Shift staffing by station**

Station	EMS Level	Shifts/Typical No. of Individuals on Duty
La Crosse FD 1	Paramedic	10
La Crosse FD 2	Paramedic	6
La Crosse FD 3	Paramedic	5
La Crosse FD 4	Paramedic	4
Onalaska	EMT	4
Holmen Area*	EMR	1
Shelby	EMR	
La Crescent	EMR	
Brice Prairie	EMR	
Farmington	EMR	
Tri-State - EMS paramedic	Patrol near areas of high demand	10

\*The Holmen Area FD has two individuals at its station each day working 12-hour shifts (from 6 AM to 6 PM), so that adds up to one total shift. At night there are no staff working shifts.

<sup>8</sup> For further context, the Wisconsin Department of Health Services produced a report showing total and average response times for EMS agencies across the state in 2015. That report indicates that the average EMS response time across all agencies for 2016 (measured as the time from dispatch to arrival on the scene) was 8 minutes and 6 seconds. Also, in 2017, the American Medical Association compiled EMS response times for 485 agencies across the U.S. (totaling 1.8 million 911 transport calls). It found that suburban areas with populations of 2,500 to 50,000 average 7.7 minutes from dispatch to arrival on scene. Rural areas with populations of less than 2,500 average 14.5 minutes.



**Table 16: First responder average response times for first unit on scene**

	EMS Response Time	Fire Response Time
Holmen FD	10:27	10:27
Onalaska FD <sup>9</sup>	5:52	7:40
La Crosse FD	4:08	4:13
Shelby FD	10:34	10:34
La Crescent FD	8:00	10:00
Farmington EMS	8.14	NA
Brice Prairie EMS	8.58	NA

La Crosse FD's average response times of under 4:15 reflect both the number of staff working on shifts at any given time and the number of fire stations in the city. As described above, before engaging with a significant fire such as a structure fire, a department needs to have a minimum of 14 to 16 firefighters at the scene. La Crosse FD is the only department that is able not only to respond to an incident, which marks the arrival of the first piece of apparatus, but also to mount an effective response force on its own and within a quick time frame.

The Holmen Area FD's higher average response times when compared to Onalaska are a function, in part, of its very large service area and its limited shift staffing. To reduce response times significantly, it is likely that the department would need to construct a second station and increase staffing significantly.

Because Shelby, La Crescent, Farmington EMS, and Brice Prairie EMS use primarily POC or volunteer staff, their 8- to 10-minute total average response times are considered good. Shelby's average response times would not be possible without two stations given the size of its response area.

Tri-State staff generally are not waiting in a station but are deployed in ambulances throughout the service area, so its response times involve only travel time. As shown in **Table 17**, Tri-State's average response times in 2019 ranged from about six minutes in Zone 1 to more than 15 minutes in Zone 4. Zone 1 is comprised of the city of La Crosse; Zone 2 includes the city of Onalaska, town of Shelby, and town of Campbell; Zone 3 includes the villages of Holmen and West Salem and the towns of Medary and Onalaska; and Zone 4 includes all other municipalities.

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<sup>9</sup> Onalaska's average response times reflect calls in which there was not a delay for turnout (i.e. a crew was at the station and ready to respond).



**Table 17: 2019 Tri-State average response times in La Crosse County**

Coverage Area	Average Response Time
Zone 1	6:02
Zone 2	7:32
Zone 3	9:51
Zone 4	15:37

Source: Tri-State Ambulance

Comparison of response times in these zones suggests that first responders typically (but not always) arrive first at the scene and begin BLS services to stabilize a patient. In Zones 3 and 4 in particular, with an average Tri-State response of nearly 10 to more than 15 minutes, first responders have a greater responsibility for patient survival. However, in the case of a serious incident, such as a multiple-injury car accident, Tri-State would be able to send a paramedic intercept or even a helicopter transport.

### *ISO Ratings*

ISO ratings are a widely referenced indicator of fire department service capacity and quality. ISO is the Insurance Services Office, an organization that provides information about property/casualty insurance risk to the insurance industry. The rating system used by the ISO includes items like staffing, equipment/apparatus, geographic distribution of resources, training, and water supply.

ISO ratings are based on a scale of one to 10, with a rating of one indicating superior service capacity, and a rating of 10 indicating failure to meet ISO's minimum criteria. The La Crosse FD's most recent ISO rating is two, Onalaska's is three, and the Holmen Area, Shelby, and La Crescent departments have ratings of four. For purposes of comparison, we recently found that only 21% of fire departments in the state have been awarded an ISO rating of four or better.

### *Mutual aid*

While each department typically is able to handle the workload of an average day, multiple calls at one time or a single major incident may require more resources than a single department can muster, which requires them to rely on neighboring departments for "mutual aid" assistance. Mutual aid allows for efficient deployment of resources because departments can staff to their average workload instead of needing to staff for catastrophic incidents or peak workloads.

Mutual aid can take many forms. Wisconsin has a formalized system of mutual aid used by fire departments statewide called the Mutual Aid Box Alarm System (MABAS). Under this system, there are formal structures in place that govern the dispatch of neighboring departments depending on the type of incident. While MABAS generally is used to respond to major incidents, departments also make frequent use of other mutual aid on a less formal basis, including having neighboring departments stand by for assistance if a second call comes in when their resources are being utilized for an initial call. Some neighboring departments also have "automatic aid" agreements under which both are simultaneously dispatched to respond to certain calls in either jurisdiction.





Mutual aid is important to all departments regardless of their size. However, in an area with a large disparity in resources, a system of mutual aid can tap larger career departments more than smaller departments with part-time staffing models, raising concerns about equity and funding.

Discussions with the fire chiefs suggest that use of mutual aid in La Crosse County is not as extensive as we have observed in other regions. One reason may be that the smaller departments seem to prize their independence and their ability to manage calls within their service areas. As the largest department with the most available resources at any given time of day, the La Crosse FD does provide some mutual aid support to the Onalaska, Shelby, and Holmen area departments. Even so, La Crosse reported that mutual aid accounted for only 15 calls in 2019, which is negligible in comparison with its 6,837 total calls that year.

Holmen Area FD, with the lowest number of FTEs relative to call volume, is a more frequent user of mutual aid and the MABAS system. Given that the department only staffs with two persons per shift, when the crew is called out the station is not manned. In such situations, the chief first calls for POC staff to backfill the station, but the availability of POC staff for daytime response can be variable. Consequently, in some cases, the Holmen Area FD does rely on mutual aid to cover the station.

## Equipment and budgets

Each of the agencies is well supplied with apparatus, as shown in **Table 18**. Several chiefs noted that between all of the departments there is an oversupply of ladder trucks and it is clear that each department has more apparatus than can be staffed at any one time. However, chiefs did make the case that when staffing is limited, having the right piece of apparatus can affect the success of the response.

**Table 18: Station apparatus**

	Fire Engine	Brush	Tender	Quint/Ladder	Rescue	Command	Total
Holmen	2	1	1	1	1	1	7
Onalaska	3	1	1	1	2	1	9
La Crosse 4	1			1		0	2
La Crosse 2	1		1	1	1	1	5
La Crosse 1	2			1	1	3	7
La Crosse 3				1	1	0	2
Shelby/GR 1	2				1	1	4
Shelby/GR 2	1					1	2
La Crescent	3	1	1		1		6



## Department budgets

There is a wide divergence among the five fire departments with regard to annual operating expenditures, as shown in **Table 19**. La Crosse spends nearly \$10.5 million annually to support its large full-time department, while the small, part-time departments in Shelby and La Crescent spend only a fraction of that amount. The table also reveals the substantial growth in costs experienced by the Holmen area and Onalaska departments over the past four years as call volumes have increased and service models have been adjusted in response to that growth.

**Table 19: Operating expenditures per department, 2016-2020**

Total Operating Expenditures	2016 Actual	2020 Budget	% Change (2016 - 2020)
<b>La Crosse FD</b>	<b>\$10,033,886</b>	<b>\$10,516,532</b>	<b>3.8%</b>
Personnel	\$9,541,108	\$10,030,961	4.1%
Non-personnel	\$492,778	\$485,571	-1.5%
<b>Holmen Area FD</b>	<b>\$447,364</b>	<b>\$753,350</b>	<b>68.4%</b>
Personnel	\$358,444	\$639,100	78.3%
Non-personnel	\$88,921	\$114,250	28.5%
<b>Onalaska FD</b>	<b>\$1,257,917</b>	<b>\$1,709,446</b>	<b>35.9%</b>
Personnel	\$1,172,015	\$1,615,166	37.8%
Non-personnel	\$85,902	\$94,280	9.8%
<b>Shelby FD</b>	<b>\$168,925</b>	<b>\$169,500</b>	<b>0.3%</b>
Personnel	\$128,179	\$114,200	-10.9%
Non-personnel	\$40,746	\$55,300	35.7%
<b>La Crescent FD</b>	<b>\$232,927</b>	<b>\$250,060</b>	<b>7.36%</b>
Personnel	\$80,509	\$94,860	17.83%
Non-personnel	\$152,418	\$155,200	1.83%

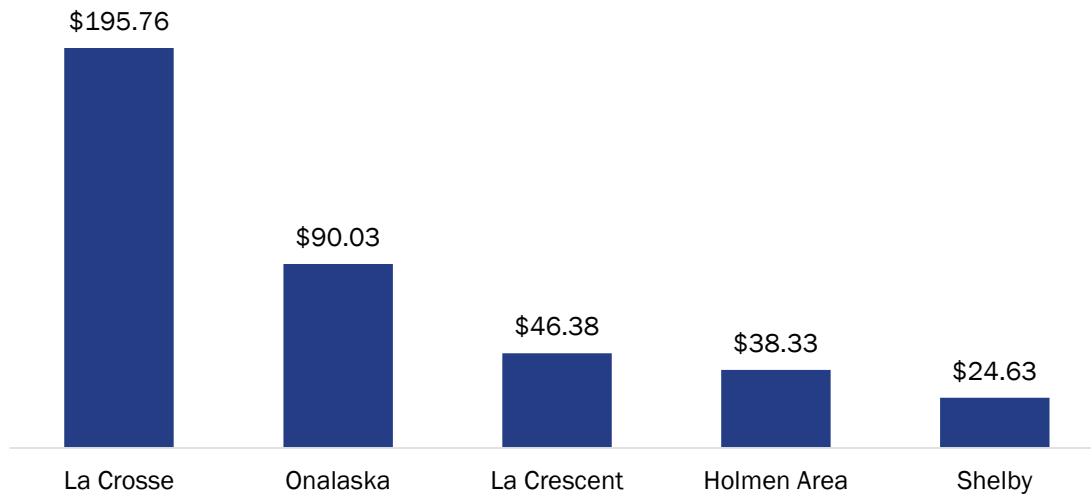
Several chiefs described the three larger La Crosse County departments as being on a continuum. They commented that the Holmen area department is where Onalaska found itself several years ago in terms of its need for increased resources to maintain acceptable service levels. Onalaska, meanwhile, has already met that initial need but is now looking to respond to growing demand by gradually increasing shifts and moving closer to the career staffing model used in La Crosse.

The expenditure trends shown in the table seem to bear out that description. While the Holmen Area FD still maintains a lower budget than Onalaska and La Crosse, it has seen expenditure growth of 68% since 2016. Of that total, \$100,000 of the increase relates to benefits, reflecting a transition from POP or POC employees to more regular full-time staffing. Onalaska's large increase in personnel expenditures also is related to greater use of career staff.

**Chart 1** provides additional perspective by showing 2020 budgeted operating costs for the five fire departments on a per capita basis. While not shown in the figure, Tri-State's cost per capita is \$35.53, although that cost is entirely funded with ambulance revenues and does not require support from the property tax levy.



Chart 1: 2020 per capita expenditures by department



**Table 20** shows capital expenditures for the five departments from 2016-2020. Capital budgets include major station repairs or replacement (but not minor maintenance), as well as major vehicle/equipment purchases. Capital costs often are financed with general obligation bonds or other forms of borrowing.

Unlike operating costs, capital expenditures vary considerably from year to year depending on whether vehicle purchases or major station-related projects are planned for that year. One way to “smooth out” variations in capital spending is to look at actual total capital spending over the four years. That analysis shows that capital expenditures represent a significant expense. In fact, on a per capita basis, capital expenses are larger than operating expenses for the Holmen area and Shelby departments. This comparison shows that fire apparatus is an expensive and fixed cost no matter the size of a fire district. In departments with smaller service populations, per capita capital investments in fire apparatus and equipment can be significant.

**Table 20: Capital expenditures per department, 2016-2020**

FD Capital Exp	2016 Actual	2017 Actual	2018 Actual	2019 Actual/Projected	2020 Budget	2016-2019 Total	Total Per Capita
La Crosse FD <sup>10</sup>	\$327,837	\$1,897,944	\$614,016	\$1,007,419	\$4,634,995	\$3,847,220	\$71.61
Holmen Area FD	\$57,901	\$153,933	\$1,043,661	\$102,613	\$149,538	\$1,358,108	\$68.09
Onalaska FD	\$26,967	\$605,505	\$52,757	\$124,619	\$1,257,385	\$809,848	\$42.65
Shelby FD	\$0	\$0	\$0	\$635,897	\$14,777	\$635,897	\$92.40

## Summary

Our data collection and interviews with chiefs and other key informants reveal that the agencies in this study vary widely in terms of their service models, staffing, and operating budgets. There also

<sup>10</sup> Capital costs for the La Crosse FD in 2019 and 2020 reflect funding for a new fire station in the southern part of the city.



are clear differences in demand for both fire and EMS service between the urban and urbanizing areas and more rural parts of the region. La Crosse is clearly the “big brother” of the region, both in terms of calls for service and overall resources.

Despite these differences in service models and service expansion needs, we have identified a handful of key issues that affect each of the study participants and that may benefit from collective planning and coordination as departments seek to resolve them:

- The **Holmen Area FD is in a period of transition because of growing call volumes and development**, which has required increases in spending and staffing that will need to continue or even escalate. Despite the large increase in operating expenditures since 2016, this department has the lowest staffing relative to calls for service and covers a large geographic area. How the Holmen Area FD responds to this challenge could impact other departments, either positively by providing opportunities for greater mutual aid support; or negatively by requiring the department to seek greater mutual aid from its neighbors.
- We observe **lower levels of mutual aid** than we have seen in other regions, and our stakeholder interviews suggest this may be partly due to longstanding political disagreements, which limit requests for assistance or may cause departments to request aid from a department that is not the closest or best able to provide it. La Crosse, with 25 shifts around the clock, is in the best position to provide mutual aid to surrounding departments when called upon, but growth in the region is projected to occur relatively far from that department in the north. Still, enhancements to the mutual aid framework used by the departments – and potential extension to concepts like “closest unit response” or automatic aid – could address some service challenges and benefit the entire county.
- The two-tiered response used for EMS by the municipal departments and independent EMS agencies in conjunction with Tri-State appears to work well, though **there may be an overuse of EMS resources in La Crosse. In addition, response times in Zones 3 and 4 for Tri-State are lengthy**, which puts added pressure on first responders.
- The smaller departments and EMS agencies appear to be functioning well and managing calls within their service areas. Shelby and La Crescent have healthy rosters of POC employees, but we also heard that **recruitment is growing more difficult for all departments**. This problem is common to many fire departments throughout the state as younger generations react to changing economic conditions, family pressures, etc. Whatever its cause, recruiting POC staff may become more difficult at the same time that call volumes are increasing.
- While several departments face operating budget challenges, **there appears to be an overabundance of apparatus** for the region as a whole. This suggests possible opportunities for shared services on the capital side that may free up resources on the operating side. We have also noted that the investment in apparatus in some of the smaller departments is quite large on a per capita basis, mainly because the cost of required apparatus is spread over a much smaller service population.



- Each of the three large departments in the western part of the county has cited the **potential need for a new station or stations to meet increasing service demands** and Shelby has cited the need for significant repairs or replacement of its western station. This suggests an opportunity to join forces to plan for new station development and possible sharing and joint staffing of stations after they are built.

In the following sections of this report, we will discuss possible opportunities for the participating agencies and departments to collaborate to address the challenges noted above. The fire and EMS providers covered by this study have some specific advantages that suggest considerable potential to use enhanced service sharing as a strategy to address these challenges collectively and improve service levels throughout the region, including the following:

- All of the agencies are dispatched by La Crosse County. Consolidated dispatch is a prerequisite for significant service sharing or even implementing a “closest unit response” framework under which the closest engine or ambulance will respond to a call regardless of geographic boundaries. Also, as noted above, Tri-State performs “emergency medical dispatch” services throughout the county, which means that 911 calls involving medical emergencies can be transferred to a medical professional who provides medical instructions to a patient or others on the scene before the first responder arrives.
- Department leaders understand the benefits that could be gained through greater coordination and are committed to moving past historical impediments to service sharing. Certain service sharing arrangements are already in place and could be built upon, including the La Crosse FD’s contractual arrangement to provide vehicle maintenance services to the Holmen Area FD and regular meetings of training officers from the various departments.
- The municipal departments’ joint contract with Tri-State allows for paramedic response to all areas of the county and unified medical direction and training opportunities. While there are differences in response between the city of La Crosse and outlying areas, Tri-State has brought consistency to EMS and is a cornerstone of coordination that is already in place.

In terms of challenges to further service sharing, one that stands out immediately is the wide variation between departments in terms of staffing models and funding. Some of these differences stem from variations between urban, urbanizing, and rural areas. Service sharing initiatives, such as joint training or sharing of apparatus, require a degree of standardization which may not provide equal benefits to all departments.

Variations in per capita operating expenditures also present an obstacle to service sharing. La Crosse taxpayers fund a higher level of service in their city and should not be expected to subsidize improved response in other jurisdictions or vastly enhanced levels of mutual aid; at the same time, other jurisdictions may be largely satisfied with their service levels and may not wish to pay more to achieve a level of service that more closely approximates that of La Crosse.

Finally, we would be remiss not to mention the effect of the COVID-19 pandemic on fire and EMS services. The effects noted so far have been a temporary reduction in EMS calls along with the need for greater attention to infection prevention. Longer-term effects are unknown at this time but should be considered as part of any future service sharing and planning discussions.



# OPTIONS FOR CHANGE

As discussed in the preceding pages, while there are no glaring red flags with regard to the current level and quality of fire and EMS services provided to residents in the La Crosse County region, several challenges have emerged. In particular, a common challenge for each of the participants is the need to manage ongoing budgetary pressures while, at the same time, determining ways to address growing call volumes and continued new development.

This section considers both service sharing and consolidation options that may allow the study participants to grapple with their challenges in a manner that would be less expensive and more effective than if they attempted to do so individually. None of these options are mutually exclusive, and they could be pursued progressively over time from smaller-scale initiatives which could create a stronger basis for collaboration to more in-depth service sharing initiatives over the longer term.

The first tier of service coordination, and the easiest to implement, involves support functions that are common to all fire/EMS agencies, such as training, recruitment, and fire prevention. An example of functional service sharing that is already occurring is a contractual agreement under which the La Crosse FD handles vehicle maintenance for the Holmen Area and La Crescent departments.

A more ambitious level of cooperation involves options relating to collaborative fire or EMS response. Those options can range from formalizing arrangements for mutual aid to more advanced forms of cooperative response that could include automatic aid agreements or a “closest unit response” framework.

Finally, a third tier of options relates to sharing stations or staff or contracting or consolidation between two or more departments. While we do not detect strong interest by some of the participating agencies in consolidation options at this time, we felt it was important to include them given the growing challenges in the region and the possibility that local officials might be more open to them in the future.

## Tier 1: Enhanced Functional Service Sharing

There are several options to improve existing service sharing arrangements between departments and to forge additional collaboration around specific support functions that are common to each. Typical support functions that could be shared include training, recruitment and retention, and EMS case management, among others.

### Joint Training

While training is a requirement for any job, for fire and EMS professionals it can be a matter of life and death for both the providers themselves and the public. Training is an ongoing and essential function for all departments, and joint training between departments is important preparation for the major incidents that require multiple agencies to work together on the scene.





In La Crosse County, training officers already meet regularly and some joint training does occur. However, common obstacles are the difficulty involved with scheduling training sessions for part-time staff, many of whom have jobs during the day and family matters to attend to at night; and the need to pay for staff to backfill stations when those

### Tier 1: Enhanced Functional Service Sharing Options

Option	Description
Joint Training	1. La Crosse coordinates training for region 2. Tri-State enhances & coordinates EMS training 3. Create joint training bureau
Joint Recruitment & Retention	Departments with part-time staff recruit jointly & standardize pay and advancement opportunities.
EMS Case Management	Departments jointly pay for EMS case managers to proactively serve frequent 911 callers.
Other	Build on La Crosse-Holmen Area vehicle maintenance arrangement and explore applying to prevention, inspections, investigations.

scheduled for regular shifts must take time away for training. Another obstacle noted by the Holmen Area chief is that the travel time between Holmen and La Crosse's training facility is 35 to 45 minutes. A joint training solution may need to include a more centrally located facility, or possibly the addition of a northern La Crosse training facility.

Some possibilities for collaboratively addressing these common challenges include:

- **La Crosse takes the training lead.** La Crosse already owns a training facility (which is shared for some training) and it has established a strong training program which could be extended to all departments in the region. This approach would allow all departments to access La Crosse's training facility (instead of having to travel to Sparta for some training) and it would relieve smaller departments from having to dedicate staff to training administration. Some financial participation by those departments likely would be appropriate to help maintain the training facility and pay for extra training staff hours in La Crosse, but all departments would benefit from having staff dedicated solely to training, as well as an assurance that all personnel across the region are trained to the same standards and protocols. While different training needs and scheduling obstacles among the different departments may still pose barriers to this approach, it is certainly possible that training staff housed in the La Crosse FD could design programming and scheduling that would meet the needs of both La Crosse and the smaller departments.
- **Tri- State provides enhanced EMS training.** Gundersen Health System, in conjunction with its subsidiary, Tri-State Ambulance, already plays a large role in training personnel across the region for EMS first response and in many respects already provides county-wide coordinated training in this area. That role could possibly be expanded even more to include cross-credentialing of AEMTs and paramedics in Zones 2 through 4 similar to the practice currently used in La Crosse. This would create a larger pool of responders who might be able to respond to a scene more quickly than Tri-State and improve ALS response times in those communities.
- **Regional training bureau** The most comprehensive option for joint training would be the creation of a regional training bureau that would operate similarly to the La Crosse option outlined above but with independent staff and a regional training facility that would be governed by all of the departments jointly. This may be more politically palatable to the other departments than having



the La Crosse FD administer training, and it may also benefit La Crosse by allowing it to dedicate its training staff to other needs. It is possible that Western Technical College could be contracted to house and coordinate such a bureau and training facility. This approach likely would require a significant annual investment, which could be shared proportionally by the participating departments based on factors like population, property values, and calls for service. Once the cost was determined, each jurisdiction would need to decide for itself whether it would be justified by the potential benefits.

## Joint Recruitment and Retention Strategies

All of the departments cited recruitment and retention of qualified staff as an ongoing challenge. Smaller departments are especially challenged, as it was noted that recruits may start their career in such departments but then leave for larger departments with more opportunities for advancement and better training. POC employees may also pursue additional EMS licenses and look to larger departments that offer them a greater opportunity to use their skills.

The departments that rely on POC staff could establish joint human resources strategies that would involve standardizing POC pay rates and joint recruiting for part-time staff, who could be assigned POP shifts based on departmental vacancies and needs. The participating departments also could consider jointly paying for recruitment incentives like subsidizing the cost of training required for advanced EMS licenses. Any implementation of joint recruitment would require all departments to agree on minimum employment standards, such as physical fitness exams, training requirements, and certification and licensing standards.

On the retention front, many chiefs noted that the people most likely to stay are those who already have roots in the community. A retention program that identifies more options for advancement between departments may help keep employees in the region, although it could facilitate transfers between departments.

## EMS case management

EMS providers across the country are increasingly using EMS staff to proactively serve heavy users of 911 services and hospital ERs. Also known as “community paramedicine,” this approach involves using paramedics to perform a range of services outside of emergency care, such as:

- providing or connecting patients to primary care services
- completing post-hospital follow-up care
- providing health education programs
- helping patients integrate with local health care systems and providers

The city of Greenfield in Milwaukee County is an example of a combined fire/EMS department that has hired a case management officer to conduct such follow-up to reduce service calls among heavy users, as well as to conduct educational activities aimed at promoting health and safety and discouraging 911 calls for non-emergency medical issues. An EMS case manager or case managers also could work more closely with senior facilities to reduce usage by those facilities.



One or more departments may wish to consider jointly funding one or more case management positions to cover multiple jurisdictions on a regional or countywide level. Similar to the training officer, case management staff could be housed in one of the participating agencies with the cost shared by all.<sup>11</sup>

## Other Functional Service Sharing

Vehicle maintenance, fire prevention and education, fire inspections, and investigations also are functions that could be unified and provided regionally. This could occur either by housing the service in one of the existing departments and having others chip in for the cost, or grouping all of these functions together into a jointly funded freestanding administrative bureau (which also could handle training and recruitment).

Similar to training and recruitment, the calculus for each department would be whether paying another department or a jointly-funded entity to perform the function would produce a higher level of service than the department could realistically effectuate itself. If so, then key questions are whether outsourcing the service would actually reduce costs by freeing up internal resources or allowing for the elimination of positions. In most smaller departments, fire prevention and inspection are jobs taken on by shift staff who also respond to calls, so removing those duties would not equate to a reduction in staffing costs.

An example of the potential benefit of service sharing for support functions is a vehicle maintenance arrangement that the Holmen Area FD has entered into with the La Crosse FD. La Crosse had excess capacity that it could devote to Holmen Area FD vehicles and it now performs maintenance on those vehicles and bills the Holmen Area FD for its service (a similar agreement exists for La Crescent). This produces a small revenue stream that the La Crosse FD can use to offset other costs. In the meantime, the Holmen Area FD is able to avoid hiring vehicle maintenance staff or using existing staff who would have to be pulled away from other duties or who may not have the expertise of the La Crosse mechanics.

## Tier 2: Enhanced Coordination of Operations

Collaboration with regard to support functions may improve the ability of individual departments to meet common challenges, gain efficiency, and work more cohesively when engaged in a joint response. However, if the goal is to improve service quality and response times, then a higher level of service sharing options involving operational coordination should be considered.

Operational coordination options address how departments respond to a call and operate at a scene. While they do offer potential benefits in terms of response, these options also may entail extra financial cost and involve an investment of time in planning and preparation.

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<sup>11</sup> Some EMS case management already exists in the region via Gundersen Health System's use of two hospital-based community paramedics to perform follow-up with high utilizers.



## Improved Mutual Aid

As noted in the previous section, mutual aid in the study region does not function as cohesively as it does in other regions we have examined. While the MABAS framework works well for large structure fires or other major incidents, there could

be improvements in the use of mutual aid for minor incidents or during times of heavy call volumes.

### Tier 2: Enhanced Coordination of Operations Options

Option	Description
Improved Mutual Aid	Formalize mutual aid agreements and practices to enhance cohesion and effectiveness; consider automatic aid, change of quarters, closest unit response as part of such agreements.
Work with Tri-State to Improve EMS Response	Departments outside of La Crosse work jointly with Tri-State to improve first response times and ALS response in Zones 2,3,4.
Share Apparatus	Develop service sharing agreements to share ladder trucks, tenders/tankers, back-up equipment.

The most notable issue that was conveyed to us anecdotally is that calls for mutual aid do not always involve the nearest and most appropriate department. For example, while the La Crosse FD has the capacity to play a larger role in providing mutual aid to smaller departments, we were told by several of our interviewees that La Crosse often is not asked to assist. Some cited longstanding political tension between the city and its suburbs as the cause, while others cited concern among smaller departments that if dispatched to a scene in their community simultaneously, La Crosse would arrive first despite the longer travel time because it does not have to call in POC staff to respond.

All of the chiefs agreed that this is far from an ideal circumstance and that further discussion and agreement on more formal and/or enhanced mutual aid practices and procedures would benefit the region. Such formalization and enhancement could take many forms, including the following:

- Automatic aid, where two or more departments are dispatched automatically for a structure fire or major incident.
- Change of quarters, in which an adjacent department covers empty stations when crews are responding to a call.
- Closest unit response, in which the closest and most appropriate unit is dispatched to an incident without regard to service area boundaries.
- Paramedic directive, which designates the highest level of EMS responder, whether an AEMT or paramedic, to lead at the scene, regardless of service area boundaries.

It is important to note that most of these options would require investment in upgraded dispatch equipment and technology at the La Crosse County Public Safety Communications Center. For example, the communications center does not currently possess the computer-aided dispatch (CAD) technology to track the activities of each department and determine when one is sufficiently busy to trigger an automatic call for back-up. The county already is in the midst of pursuing dispatch technology improvements but this process may need to be expedited and enhanced if some of the more advanced forms of operational collaboration are pursued. County leaders may also wish to collaborate with Tri-State on such improvements, as Tri-State already possesses its own dispatching capacity that allows it to utilize a closest unit response framework.



Questions also could arise regarding reimbursement under certain forms of enhanced mutual aid and response. As noted above, the La Crosse FD could play a more prominent role in backing up smaller departments or may be able to respond to incidents in other jurisdictions more quickly given its full-time status, but it also pays far more per capita for that level of service than each of the surrounding communities. Consequently, any agreement in which La Crosse would play a much bigger role in mutual aid may need to consider some type of cost sharing. Shared costs might be palatable if departments receiving enhanced mutual aid from La Crosse are thereby able to avoid investments in extra capacity that they would otherwise have to make.

Identifying the resources to pay for dispatch improvements and reconciling cost sharing issues would be challenges, but we have reported on formalized mutual aid arrangements in other parts of the state. For example, in Jefferson County, a pending agreement between the city of Watertown and villages of Lake Mills and Johnson Creek stipulates the following cooperative activities between the three fire departments:

- The departments agree to jointly respond (when available) to any structure fires within their collective service area.
- In the event that one department's resources are temporarily depleted (either because existing units are deployed or it is experiencing an equipment failure or other challenge), that department can request a neighboring department to send apparatus and staff or to otherwise be available to respond to a new incident.
- The departments agree "to work together to facilitate other forms of providing shared services, including joint staffing, shared equipment, community risk analysis, creation of standard operating procedures, and joint training, administration, fire prevention and education."

While the agreement has not yet been effectuated among the three fire departments, and while not all of its provisions may be appropriate for the La Crosse area departments, it could serve as a model for the study participants.

### Improved EMS Response

Our data collection and interviews revealed a need to consider strategies to improve EMS first response times in some parts of the region (including the northern part served by the Holmen Area FD and the eastern part of Onalaska's service area). Also, some chiefs expressed concerns about Tri-State's ability to respond soon enough to ALS calls in certain parts of the study area, particularly during times of high call volumes. While enhanced mutual aid (as described above) could address these issues to some extent, continued discussion regarding EMS response times is recommended.

Beefing up EMS first response times in the Holmen area and Onalaska likely would require additional full-time staff at those departments and/or new stations. To help offset those increased costs, some stakeholders suggested that consideration be given to allowing those fire departments to take over some or all ambulance transports from Tri-State as a means of generating patient revenue, as there are no revenue offsets for first response activities they currently conduct. That possibility had



previously been the subject of discussion between Tri-State and the La Crosse FD, but the two parties instead agreed on the joint paramedic staffing arrangement that currently exists.

While ambulance transport revenue would provide some fiscal benefit to fire departments in the region, the loss of that revenue could prompt Tri-State to discontinue operations there, which would create the need for all of the departments (including Shelby and La Crescent) either to add paramedic-level staff or contract with another department for ALS services. Also, neither the Onalaska nor Holmen Area departments are currently licensed at the paramedic level, and upgrading to ALS would involve additional costs besides simply adding personnel.

This is not to say that there should not be continued operational review with Tri-State aimed at improving both first and paramedic-level responses. As noted earlier in this report, efforts to lower response times in Zones 2, 3, and 4 appear warranted, and it may be fruitful for Tri-State and the departments to consider ways that they could coordinate and perhaps jointly expand resources to generate such improvement. It may also be beneficial for the Onalaska and Holmen Area departments to discuss with Tri-State an agreement similar to the one it has with the La Crosse FD involving cross-trained paramedics who work for both entities. This could potentially improve paramedic-level first response in those jurisdictions and help the two departments with recruitment and retention by providing career opportunities for interested personnel.

### Shared Apparatus

As noted earlier in this report, the chiefs acknowledge that collectively, there are more vehicles in the region than would be required if it were served by one consolidated department. Indeed, given that most structure fires outside of the city of La Crosse require mutual aid because of the relatively low staffing levels of the other departments, there should not be a need for each department to maintain its own full complement of engines and trucks. However, as individual departments, each has continued to purchase a wide range of vehicles so as not to be dependent on others. ISO ratings also depend to some extent on the size and variety of fire equipment, and that may be another reason for some duplication of vehicles within the county.

To address this situation, departments could enter into formal agreements to share specific vehicles or to borrow back-up vehicles from one another when mechanical problems arise and a vehicle is out of service. It is possible that a regional pool of back-up vehicles also could be created and jointly funded so that individual departments would not have to maintain back-ups themselves.





## Tier 3: Advanced Options

The final set of options we present for consideration would involve a higher level of collaboration and sharing than the first two sets. Perhaps more consequential, they may require a decision by one or more municipalities to give up some or all of their independence and contract with a larger neighboring department or join a consolidated department.

We acknowledge that none of the study participants expressed an immediate desire to disband their individual departments and join forces with others.

However, most agreed that such action may need to be contemplated within the next few years as financial and staffing challenges intensify, and that it would be worthwhile to identify consolidation options so that informed consideration might occur – if not now, then in the future.

**Tier 3: Advanced Options**

Option	Description
Station Sharing	Existing and potential new stations are shared by one or more communities to reduce staffing and/or construction costs and encourage new contracting arrangements.
Consolidation Through Contracting	The heavily-resourced La Crosse FD would provide fire and first response service under contract to Shelby, Greenfield, and La Crescent, thus reducing the number of departments from five to three.
Consolidated Department	A single consolidated department would replace the five departments, which would function under the governance of a board of directors formed by the participating municipalities.

### Station Sharing

As noted in previous sections, several departments are considering new stations, including La Crosse (which is considering two), Onalaska, and the Holmen Area FD. In addition, Shelby has cited a need to replace its western station in the not-too-distant future.

While communities typically consider new stations to respond to increased call volumes created by new development or other factors, they seldom consider an alternative option of tapping into a neighboring community's station as a slightly less effective but far less costly option for serving new economic growth; or perhaps teaming up with a neighboring community to share the cost of building and staffing a new station that could be constructed near their mutual border.

Consideration of station sharing also may be logical given that station locations within a region may have made sense when the stations were first built, but development and population patterns may have reduced that sensibility over time. That appears true in the La Crosse region, where there is little question that if the current chiefs were to plot ideal station locations on a map for the region as a whole, then they would not be located where they are today.

For example, Station 3 in southern La Crosse and Station 1 in western Shelby are spaced far more closely together than would be appropriate if each municipality was not handling its own fire and EMS operations. Stations at the regional airport and Campbell also are located in close proximity. The desire of the current departments to maintain their independence dictates that that these close-by stations will continue to exist, but station sharing may at least be worthy of consideration.

While station sharing is not common, it does exist in Racine County, where the South Shore and Caledonia departments share a station staffed with 24-hour shifts of three firefighters apiece on the



border of Mount Pleasant and Caledonia. A prime advantage is that each is able to maintain its independence. However, as a result, each feels it necessary to maintain three shifts (for a total of six) despite the fact that call volumes likely would justify only four.

Other options for station sharing also exist. For example, two departments could combine forces and apparatus and respond to calls jointly from a shared station; or one of the departments can be tapped to serve the entire radius covered by the station regardless of municipal boundaries.

We believe there is considerable potential for station sharing in the La Crosse area that the individual departments could pursue if each wishes to maintain its independence. Below we cite a handful of possibilities.

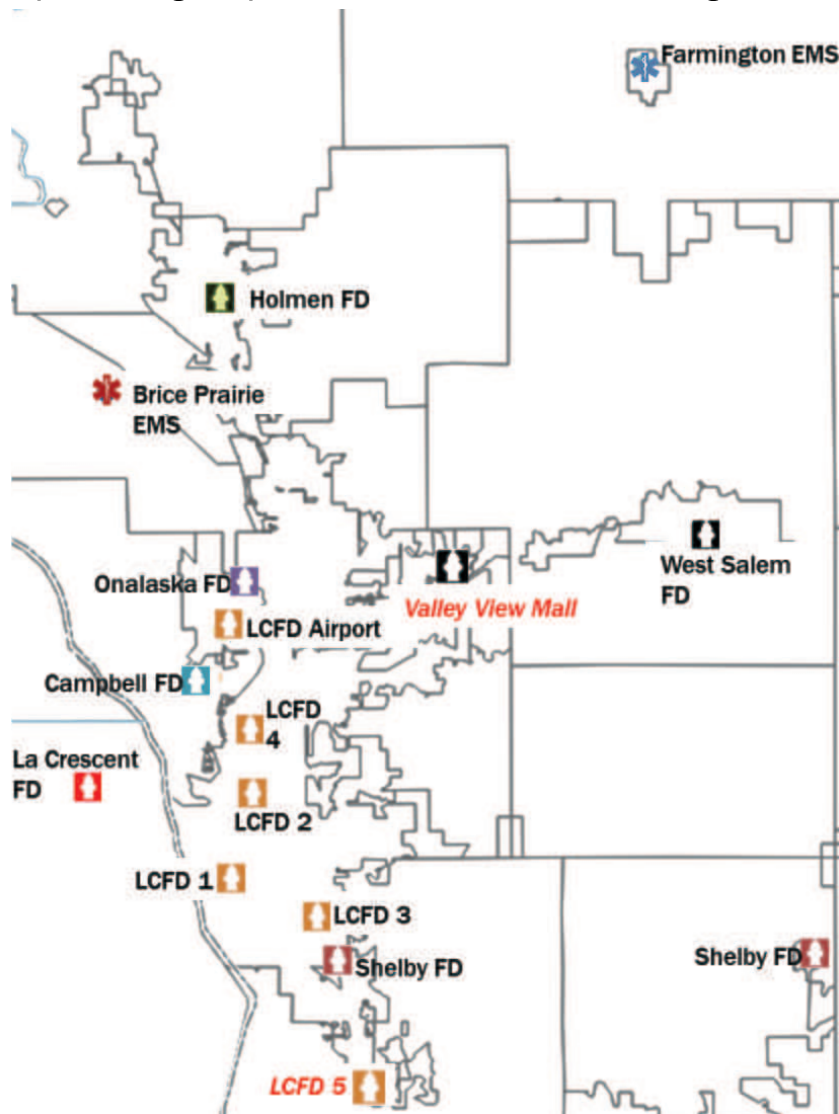
- **New station in the Valley View area.** Both La Crosse and Onalaska have cited the need for a new station in the area near the Valley View Mall (shown in **Map 2** on the following page) in light of increased call volumes on each side of the municipal border. Tri-State often locates an ambulance in that area and has also discussed a new station there. The town of Medary – which currently contracts for fire and rescue service with the La Crosse FD – also could see improved response times from such a station and West Salem could be approached about having some or all of its service area covered by a new station in this area.

Under a scenario in which a new Valley View station is shared between the La Crosse and Onalaska FDs, construction costs for the two departments could be split and they potentially could share contractual payments from smaller communities. Depending on the staffing arrangement and the possible inclusion of a Tri-State ambulance, a shared station also could dramatically reduce personnel and apparatus costs (compared to the cost of two individual stations) while improving both BLS and ALS response. It is also worth noting that difficulties often associated with site selection and acquisition could be alleviated, as Onalaska has identified a site in the vicinity for a new municipal facility that could possibly include a fire house as well as space for law enforcement and public works.

- **New station to serve southern La Crosse and Shelby.** La Crosse has already initiated planning for a new Station 5 in the southern part of the city to improve response times in that area (also shown in **Map 2**). At the same time, Shelby has cited the need for major repairs or replacement of its western station, which is in close proximity to La Crosse's Station 3. With a new Station 5, La Crosse could absorb call volume for much of Shelby's service area using both that station and Station 3, potentially setting the stage for a contractual arrangement between Shelby and La Crosse that would negate the need for replacement or rehabilitation of Shelby's station.

Conversely, the two departments could jointly staff Stations 3 and/or 5 and cover calls in their own jurisdictions, though that may not make sense given that Shelby would need to call in POC staff to respond to incidents while La Crosse staff would already be at the stations and ready to respond. A third option would be for Shelby to move forward with replacement or rehabilitation of its western station and have that station be jointly staffed to serve the southern part of La Crosse, thus eliminating the need either for Station 3 or a new Station 5.

Map 2: Existing and possible new stations in La Crosse region



- **Station sharing between the Holmen Area FD and Tri-State.** Tri State currently staffs an ambulance station in the town of Onalaska that has room for a fire engine. The Holmen Area FD could explore the possibility of housing an engine and potentially a three-person shift at that station (with either full-time or POP staff or a combination). A joint staffing arrangement for paramedics similar to the one that currently exists between La Crosse and Tri-State also could be explored for that station.
- **Sharing of La Crosse Regional Airport station.** The small fire station located at the regional airport currently houses one vehicle and a single firefighter/EMT. According to the La Crosse chief, with some capital investment it could accommodate a two-person ambulance crew or a four-person engine company in addition to the current position. While La Crosse does not currently have sufficient call volume in the vicinity of the airport to justify taking that step on its own, such

expansion could make sense if it also served parts of Onalaska and Campbell, as can be seen in **Map 2**. Such an option could involve station sharing or an arrangement under which La Crosse would staff the station and serve parts of Onalaska and Campbell on a contractual basis.

### Consolidated Service Through Contracting

Building off the station sharing possibilities described above, one option for consolidated service in the southern end of the study area would be for La Crosse to contract with Shelby, Greenfield, and La Crescent to provide fire and first response EMS. While they chose not to participate in this study, West Salem and Campbell also could logically be included in such an arrangement.

In terms of fire response, a contractual arrangement may be logical given that any structure fire outside of the city of La Crosse already requires mutual aid in order to assemble the required staff to fight the fire. In many cases, La Crosse FD engines are already responding to these larger fires.

In regard to EMS response, **Table 21** shows that rough travel times between the nearest La Crosse station and the adjacent municipalities of Shelby, La Crescent, and Campbell are reasonable. In fact, it's possible that the full-time La Crosse FD could respond as fast or faster than any of those municipalities' departments in light of their use of a POC model. Greenfield would likely be too geographically distant for La Crosse to serve from its existing stations, however.

**Table 21: Approximate travel times from La Crosse stations to neighboring jurisdictions**

Travel scenario	Approx. travel time
La Crosse Station 1 to La Crescent FD	8 minutes
La Crosse Station 2 to Campbell	7 minutes
La Crosse Station 3 to Shelby Town Hall	3 minutes
La Crosse Station 3 to Greenfield	15 minutes

La Crosse officials would need to consider call volumes in relation to each of their existing stations to determine their capacity to serve the adjacent communities. If additional call volumes could be absorbed without adding substantial staff to existing stations or without needing to staff stations in adjacent communities, then the added cost to serve these areas would be minimal. That, in turn, could allow La Crosse to hold down the cost of any contractual charge to the communities it would add. In fact, while contractual terms obviously would need to be negotiated, it is possible that La Crosse could charge an amount that is comparable to the cost currently being incurred by each community (particularly if amortized capital costs are included). This would create a “win-win” by providing a higher level of service to those communities at little or no added cost while providing new revenue streams for La Crosse.

It may be determined, however, that the existing stations in Shelby, Greenfield, Campbell, and La Crescent still would need to be staffed in order to appropriately serve those areas. In that case, La Crosse could add shifts to those stations, which would benefit the affected communities by giving them the presence of full-time, career staff at their stations. However, given that the cost of a 24-



hour shift is approximately \$350,000,<sup>12</sup> such a move may not be deemed affordable. A far less costly option would be for La Crosse to build its own POC roster to staff those stations, which could allow existing POC staff from the smaller communities to be re-hired by the La Crosse FD.

## Departmental Consolidation

The final “advanced” option is the most comprehensive – a single consolidated department that would serve the entire region. Here we model one hypothetical scenario for a consolidated department and compare the cost and general service levels to existing fire and EMS services in the La Crosse region. Because each department is likely to face increased costs going forward to meet increased service demands, we also offer perspective on how those future cost increases might compare to our consolidation scenario.

The consolidated department modeled here relies on hypothetical assumptions on where stations would be located, how they would be staffed and equipped, how command and administration would be structured, and other factors based on our own knowledge and input from the five chiefs. It is important to note, however, that this is just one scenario for a consolidated department and there are many other possibilities.

### *Current staffing levels*

The first step in modeling the fiscal impacts of a consolidated department is to carefully document current salary expenditures, benefit ratios, and staffing. It is particularly important to consider shift staffing, which refers to how many firefighters are needed to staff a single 24-hour shift. While this would appear to be a simple exercise, it is complicated by the fact that career firefighters are entitled to various forms of time off (e.g. sick leave, vacation, family and medical leave). Depending on the union contract and the age/tenure of staff, most departments will need to hire between 3.5 and 4.0 career firefighters/EMTs to staff a single 24-hour shift. Overtime also is relevant to the shift staffing ratio because departments frequently fill shifts using overtime.

When a department uses part-time firefighters to staff shifts, the calculation is different. POC/POP firefighters are paid straight time based on hours worked, but they are also paid for non-shift activities such as training and meetings. Consequently, a reasonable staffing ratio for POC departments is somewhere between 3.15 and 3.25 FTEs.<sup>13</sup> Calculating the pay of part-time employees is based simply on an hourly rate times the number of hours, plus FICA (7.65%).

Finally, several employees, including uniformed personnel, work eight-hour shifts in administrative or command positions. We refer to these individuals as non-shift staff and they are accounted for in our analysis outside of the shift staffing ratio. Battalion chiefs are also considered as a separate category.

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<sup>12</sup> This cost includes salaries and benefits based on the La Crosse FD's averages. It also reflects 3.5 to 4 firefighters to cover a 24-hour shift seven days per week because of the need to account for various forms of time off.

<sup>13</sup> An FTE is not the same as an individual employee. We use FTEs as a way to standardize the hours worked by multiple employees into a comparable measure.



We examined personnel and budget figures for the five departments and developed current shift staffing ratios where appropriate. We then broke down each department's 2020 budget into four categories: general staffing, battalion chiefs (who work on shifts), non-shift staffing, and non-personnel costs (e.g. supplies, utilities, contracts, fleet maintenance, etc.). As shown in **Table 22**, in 2020, the five departments were budgeted to spend a combined \$13.4 million for fire and EMS.

**Table 22: Breakdown of fire department 2020 budgeted expenditures**

	Non-Shift Staffing	Battalion Chiefs	General Staffing	Total Personnel	Non-Personnel	Total Budget
La Crosse	\$1,452,324	\$528,182	\$8,050,455	\$10,036,961	\$485,571	\$10,516,532
Onalaska	\$264,010		\$1,351,156	\$1,615,166	\$94,280	\$1,709,446
Holmen	\$142,158		\$496,942	\$639,100	\$114,250	\$753,350
Shelby	\$33,000		\$81,200	\$114,200	\$55,300	\$169,500
La Crescent	\$12,900		\$81,960	\$94,860	\$155,200	\$250,060
Total	\$1,904,392	\$528,182	\$10,061,713	\$12,494,287	\$904,601	\$13,398,888

Comparing the general staffing cost to FTEs gives a cost per employee of \$100,845 in La Crosse. This includes base salary, overtime, and benefits, which amount to 48.4% of salary. La Crosse has the highest cost per FTE because it exclusively uses full-time employees who receive a full benefit package. The Onalaska FD, as a combined department, has a cost per employee of \$81,641 and a benefits ratio of 41.1%. The Holmen Area FD's cost per general employee is \$68,261, which reflects a lower number of shifts overall and a higher percentage of POCs in its staffing plan. Shelby and La Crescent rely exclusively on POC staff and their cost per FTE is approximately \$35,000.

### *Modeling a consolidated department*

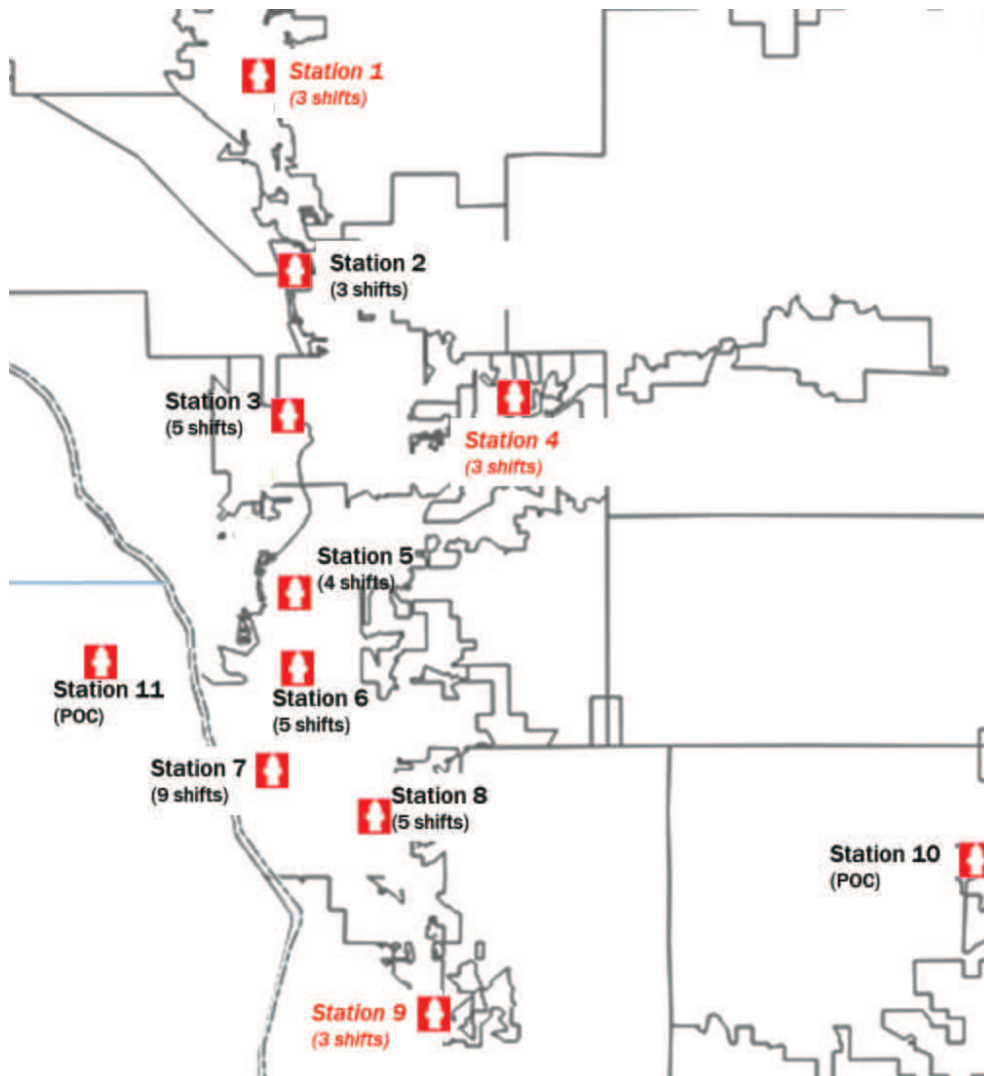
Our next step was to model station locations and daily shifts for a consolidated department, which we show in **Map 3** on the following page. Instead of having municipal barriers determine station coverage areas, we divide the region into a northern and a southern division, each with a battalion chief on a 24-hour basis. Per our earlier discussion of station sharing, we assume new stations near the Valley View Mall and another to serve southern La Crosse and Shelby (which could be located in either community) – as well as elimination of the existing Shelby station. We also assume a new station in the northern part of the Holmen area to serve new development there. Consequently, the region would have 11 stations instead of the current nine (not including the airport station).

We also assume an increase of 10 shifts – these are required both to staff the new stations and to otherwise address service challenges discussed earlier in this report. These shifts are assumed to consist of both full-time and part-time positions. Specifically, our model assumes 17.5 FTEs are filled with full-time positions and 16 FTEs are assumed to be filled with POP staff. Our model increases the percentage of POC/POP labor from 8.2% of total hours currently to almost 17% of total hours, which is similar to the ratio of POCs to total FTEs in Onalaska currently.





Map 3: Hypothetical consolidated department station locations and shifts (new stations in red)



The following provides greater detail on specific operating characteristics of the hypothetical consolidated department:

- The northern division would have five stations including the current Onalaska and Holmen area stations and La Crosse's Station 4. Two new stations are added to serve this part of the region: one northern station in the current Holmen area jurisdiction east of Highway 53, and a station to serve the area near the Valley View Mall. Currently, there are nine shifts serving the stations in this area, but we envision an increase to 18 under our consolidated model. Three new shifts are required at each of the new stations, and an additional two shifts are added to Station 2 (currently the Holmen area station) to increase its staffing level from one to three shifts. An additional shift is also added to the Onalaska station, mainly because this station would be the central station for the northern division and would also house its battalion chief. The northern division also would support the volunteer operations of Farmington Fire and EMS and Brice

Prairie EMS. Even with these increases in service capacity, the Holmen area chief noted that development in rural areas north of the village of Holmen may still experience delays in response, especially at times when there are simultaneous medical unit calls. Also, even with additional staff in the north, a structure fire in the northernmost area would need to draw on crews as far south as La Crosse Station 4 to assemble 16 firefighters. That station is 15 minutes away from the future northern station assuming good road conditions.

- The southern division would consist of the existing La Crosse Stations 1, 2, 3 and a new southern station. As noted above, the Shelby station, which currently requires significant repair, could be eliminated. POC operations at the current stations located in Greenfield and La Crescent would also be included in the southern region. Currently, about three quarters of calls for service occur in the southern region and there are 21 shifts in the area. Because population and call volumes are not projected to grow substantially in La Crosse (with the exception of some areas to the south) only one additional shift is added for a total of 22. Three shifts are located at the new southernmost station, with two relocated from La Crosse Stations 1 and 2. Nine shifts would be located at Station 7 (formerly La Crosse 1), which would also house command and administrative functions.
- In terms of the two outlying stations in La Crescent and Greenfield, it is assumed that they would be staffed primarily with POC staff, although they would be administratively connected to the southern command. There are several possibilities for adding to response capacity if call volumes continue to increase in either area. One option would be to fund a 24-hour POP EMT position that could respond immediately to calls with backup from POC staff and possibly a paramedic intercept from La Crosse. In the case of a structure fire in either Greenfield or La Crescent, apparatus from stations 7, 8 or 9 would be on the road immediately, which would improve the level of resources available for fire response in La Crescent.

### *Personnel costs*

As described above, the consolidated department envisioned here would add one station and 10 additional shifts to the current service level. Given the wider and more diverse service area and based on our discussions with the chiefs, **we modeled a combination department using both full-time and part-time staff, with a ratio similar to that of the Onalaska FD.** We assume that the new shifts would be split equally between career firefighters/EMTs and POP staff.

There are several advantages to a combination model. One is that having a variety of part-time and full-time options would offer greater opportunities to recruit, train, and promote employees. Also, the flexibility of a combination department would offer the chief much greater flexibility in scheduling staff and controlling overtime costs by using part-time staff to cover time off.

A final benefit relates to the existing POC operations at Shelby and La Crescent, where staff are highly trained and an important resource for the region. A consolidated department using both part-time and full-time staff could offer continued employment for these first responders, as well as enhanced opportunities for those interested in either part-time or full-time employment.



**Table 23** shows the cost of the 10 additional shifts.<sup>14</sup> The cost per FTE of a career position is \$68,000 in salary and overtime and approximately \$33,000 in benefits, based on the current benefits ratio for the La Crosse FD. POP pay is assumed to be \$17 per hour but the only benefit added to that amount is FICA.

**Table 23: Cost of new shifts for hypothetical consolidated department**

	Shifts	FTE	Personnel Cost
Career	5.0	17.5	\$1,765,554
POP	5.0	16.0	\$597,328
Total	10.0	33.5	\$2,362,882

In addition, we add two battalion chiefs to ensure two are on duty per 24-hour shift, one in the northern and one in the southern region. The addition of two new positions, at a cost of \$264,091, would allow for a total of six FTE battalion chief positions. We assume that captains or other officers would need to cover battalion chief shifts to accommodate paid and unpaid time off.

With regard to non-shift staffing, the departments currently have 16 administrative and command positions combined, with 11 of those in the La Crosse FD. The consolidated model is based on the existing command structure of the La Crosse FD but adds a division chief to help manage overall operations and a captain to oversee POC recruitment, training and operations. Because four chief positions and an assistant chief position are eliminated, there would be a net decrease of three command FTEs, as shown in **Table 24**. The projected savings total about \$158,000, which appears modest but is understandable given that two of the eliminated chief positions are not full-time.

**Table 24: Command and administrative positions in hypothetical consolidated department**

	Current	Consolidated
Chief	5	1
Assistant Chief	3	2
Division Chief	2	3
Captains	3	4
Fleet Mechanic	1	1
Admin Assistant	1	1
Community Risk Coordinator	1	1
<b>Total</b>	<b>16</b>	<b>13</b>

<sup>14</sup> FTE calculations for career shifts are based on a shift staffing ratio of 3.5 based on current staffing patterns of the La Crosse FD. Overtime is converted to FTEs and included in the shift staffing ratio. The shift staffing ratio for POP shifts is assumed to be 3.2 FTEs per shift.



### *Apparatus and capital costs*

Generally, a consolidated department yields considerable potential savings on the capital side given its ability to deploy its apparatus more effectively than several individual departments, as well as its ability to reduce both the number of back-up vehicles and the total number of apparatus needed. A ladder truck, for example, could be housed in a central station and respond throughout a division.

In this case, however, we assume a net increase in stations, and tenders need to be maintained in parts of the region that do not have hydrants. Without going into great depth about needed apparatus, we conservatively estimate that the consolidated department could eliminate five engines, one ladder truck, one brush rig, and a command vehicle. Because of the need to add a tender there would be a net reduction of seven vehicles.

The approximate replacement cost of these seven vehicles is about \$6 million. If the consolidated department retained those vehicles and created a sinking fund to provide for their replacement, then it would need to appropriate about \$386,000 per year for that purpose. Given that those vehicles would be eliminated, however, **we assign an annual savings of \$386,000 to the consolidated department for the smaller fleet.**

Finally, despite the fact that our consolidated model includes two new stations, we do not include the construction cost of those stations in our analysis. That decision is predicated mainly on the fact that both new stations already have been proposed outside of any discussion of consolidation, so the cost would occur regardless. Also, station construction costs are very difficult to estimate without knowing factors like site location, and it would be similarly difficult for us to estimate offsetting savings from elimination of the Shelby station and its rehabilitation or replacement costs.

### *Supplies and other non-personnel costs*

Non-personnel costs include supplies, utilities, fuel, insurance, contracts with other agencies, etc. As shown earlier, the five departments currently spend just over \$900,000 per year on non-personnel costs. We expect that consolidation would allow for some savings in those costs because of greater purchasing power and administrative coordination. For modeling purposes, we conservatively assume a 10% savings in non-personnel costs.

### **Summary of consolidated department costs compared to current state**

**Table 25** summarizes our rough fiscal projection of additional costs and offsetting savings for our hypothetical consolidated department relative to current combined expenditures among the five fire departments that participated in this study. The table shows **a net additional annual cost of about \$2 million.**



**Table 25: Cost summary for hypothetical consolidated department**

Expenditure	Cost/Saving
Shift staffing	\$2,362,882
Battalion chiefs	\$264,091
Non shift staffing	(\$158,304)
Apparatus	(\$386,486)
Non personnel costs	(\$90,460)
<b>Total Cost/(Savings)</b>	<b>\$1,991,723</b>

### ***“Future state” costs***

In addition to considering the added cost of a consolidated department in comparison to current combined costs, policymakers also should weigh that added cost against costs that may need to be incurred by the five departments individually as they seek to respond to increased call volumes and service demands, new development, and other factors. Of course, it is impossible to know precisely how, when, and the extent to which these jurisdictions would add capacity and incur additional costs, but our interviews with chiefs and administrators revealed that consideration of capacity enhancements already is occurring.

Consequently, to provide some context on how the cost of consolidation might compare to the cost of having each individual department pursue enhancements on its own, we developed an estimate of the “future state” shift staffing cost if the five departments individually add and staff stations currently under discussion and address POC staffing concerns. That estimate is based on the following assumptions:

- The La Crosse FD adds two shifts at the new station in the Valley View Mall area (we assume that station would be jointly staffed with Onalaska). The La Crosse chief has committed to staff a new southern station by shifting existing staff with no net increase in staffing.
- The Onalaska FD adds two shifts: one at a new station in the Valley View area and one at its current station to address increasing call volumes.
- The Holmen Area FD adds five shifts, two at its current station and three at a new northern station, to meet growing call volumes.
- Shelby and La Crescent fund one POP shift at \$17/hour to meet growing call volumes.

Based on current shift staffing costs at each department, **we assume that the additional annual cost of the above would be about \$2.8 million, or about \$800,000 more than the jurisdictions would need to incur collectively under our hypothetical consolidated department scenario.**<sup>15</sup>

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<sup>15</sup> Shift staffing ratios for these projections are assumed to be 3.5, and cost/FTE is \$100,845 for La Crosse, \$81,641 for Onalaska, and \$68,261 for Holmen.



It is important to note that this cost comparison assumes that a consolidated department would have a staffing model similar to that currently used by the Onalaska FD. If all of the 10 additional shifts were filled with career positions instead, then the cost of the consolidated model (which would still employ POC but at a lower percentage) would exceed the cost of the “future state” scenario by about \$367,000.

### ***Cost allocation and governance***

Of course, key considerations for each community would be how the cost of a consolidated department would be distributed among the participating communities and how the new department would be governed. We cannot hypothesize how the La Crosse area communities would agree to allocate the costs of a consolidated fire department, as there are several possible allocation methodologies that could be considered. The North Shore Fire Department uses a formula that equally weights each jurisdiction’s proportional share of calls for service, its population, and its equalized property value, but several additional factors or different combinations could be used.

There are also several potential governance models for a consolidated fire department. A logical one when consolidation involves several different communities is for the consolidated department to function as an independent entity that reports to a new board of directors established by the participants. Board representation could be determined based on a “one member/one vote” basis or proportionally based on population or other factors.

Finally, considerations like ownership of current stations and apparatus (i.e. would they remain the property of each municipality or turned over to the new department) and possible establishment of a separate fire commission would need to be determined.

### ***Service-level impacts***

The potential benefits of fire department consolidation have been documented in several of our previous studies and generally include the following:

- A larger workforce that might reduce the need for overtime to cover for injury, illness, and vacation, and that might aid in recruitment and retention by providing greater opportunities for career ladders and possibly increased compensation.
- Consolidation of non-response tasks such as planning, finance, and inspections to produce greater cost efficiency.
- Consolidation of training and other specialized functions to produce greater cohesion at the scene of incidents.
- Opportunity to redeploy the existing workforce based on actual demand, thus possibly eliminating the need to add staff to serve areas that are currently under-resourced.
- Opportunity to reduce leadership positions while enhancing the effectiveness of command by allowing leaders to strategically manage and deploy staff and apparatus on a regional level.
- Potential cost savings through more efficient procurement and possible reduction of apparatus and backup apparatus.





There are also potential drawbacks, which generally include a partial loss of local control by each community over fire and EMS operational and financial decision-making; the possibility that some communities would benefit operationally and fiscally more than others; the possibility that some may need to pay more for fire and EMS than they are paying today or are willing to pay in the future; and the challenges involved in consolidating labor contracts, staffing frameworks, and other personnel issues.

In this report, we have presented a consolidated model for the La Crosse region that includes two additional stations and 10 additional shifts across the region. Those factors alone would bring a higher level of service to some areas, particularly in the northern part of the region and to those areas now served by POC departments.

However, **it is not just the additional station and shifts, but the opportunity for coordinated and seamless response from stations that span municipal boundaries that could bring the greatest benefit in terms of improved response times and the potential to reduce the loss of life and property.** The improved response capability also could improve current insurance-based ratings (i.e. ISO ratings) for some communities, reducing insurance costs to residents and businesses.



# CONCLUSION

Our analysis of fire and EMS service sharing in the La Crosse region finds the participating departments already possess a spirit of cooperation that has resulted in some shared fleet maintenance, regular joint meetings of training officers and chiefs, and an effective countywide contractual relationship with a private ambulance service for advanced life support coverage.

Yet, we also observe several emerging challenges that suggest a need for enhanced collaboration. Those include growing demand for service in the northern and southern parts of the service area; a growing concern that some departments have sufficient capacity to respond to normal conditions but are stretched too thin during times of high call volumes; and challenges associated with retention and recruitment of paid-on-call staff. It also appears the region may not be making the best use of the full-time, well-resourced La Crosse department for mutual aid and other forms of support.

The question that prompted this study was whether, by working more collaboratively, the individual departments could address their mutual challenges in a more effective fashion than if they did so independently. We present a series of options that could be considered to answer that question affirmatively, including the following:

- **Enhanced service sharing options** include joint training, joint recruitment of part-time staff, joint case management of high-volume EMS users, and joint conduct of other non-response functions like fire prevention, inspections, and investigations. These options could be pursued via contractual agreements between individual departments or the possible creation of a regional bureau to conduct these activities under a cost sharing agreement. Benefits could include cost efficiencies through economies of scale; improved service for smaller departments (in particular); and, in the case of training, better cohesion during mutual aid incidents.
- **Enhanced coordination of operations options** would directly address fire and EMS response and capacity. They include formalization and expansion of current mutual aid protocols, including a possible move to “closest unit response” or automatic aid; working with Tri-State on strategies to improve EMS response times outside of the city of La Crosse (where they are already strong); and greater sharing of apparatus. The enhanced mutual aid and EMS options hold promise to improve service levels and response times while the shared apparatus option could lower costs.
- **Advanced options** could require some departments to relinquish some or all of their existing autonomy but hold the greatest potential for regional service improvement and enhanced efficiency. One would involve sharing new or existing stations between multiple communities as a means of cutting costs, while another would make greater use of the La Crosse FD’s capacity by having it provide contracted service to Shelby/Greenfield and La Crescent, potentially providing better service at a similar cost for the smaller communities while establishing new revenue streams for La Crosse. We also model a single consolidated department to serve the entire region, which we believe would be the most efficient and effective solution if policymakers are willing to spend more to pursue enhanced service levels.



Each of these sets of options would involve cost sharing agreements and/or a willingness by larger departments to shoulder greater responsibility for the benefit of the entire region. The more advanced options not only would require acceptance by some or all jurisdictions to relinquish some amount of local control over their fire and EMS operations, but also may cost more than the impacted communities are willing to spend.

**Nevertheless, our analysis suggests that each of the departments likely will need to increase spending in the not-too-distant future, and that collaborative action could achieve at least some desired improvements at a lower cost and a higher level of service than could be achieved by acting alone.** We also see potential – if advanced options are deemed too expensive for now – for the communities to start slowly with some of the less comprehensive service sharing options and then build toward consideration and implementation of more advanced options.

Overall, we hope this analysis sheds further light on the current and future challenges associated with fire response and EMS in the La Crosse area. Going forward, we would be pleased to support any efforts to implement the policy options cited in this report or otherwise assist the region in pursuing greater intergovernmental cooperation.

# APPENDIX I: SNAPSHOT DESCRIPTIONS OF AGENCIES

## City of La Crosse FD

The City of La Crosse Fire Department is the largest fire protection service in the County with 98 Fire Department FTE and a budget of over \$10 million.<sup>16</sup> La Crosse FD's service area includes the City itself and three surrounding townships for a total service population of approximately 54,000. In addition to fire suppression services, La Crosse FD offers specialized rescue including (but not limited to) water, technical rope, and confined space rescue. The department also provides fire inspection, plan review, and fire prevention/education services. La Crosse FD is licensed at the paramedic level and collaborates closely with Tri-State in a coordinated EMS response.

### *City of La Crosse FD, At a Glance*

		Notes
Number of Stations	4	Looking to build one or perhaps two new stations and remodel or move two existing stations
Total FTE (including hourly)	98	Fire only
Staff on Shifts	29	Min 25, max 31
Population Served (Est)	53,721	City of La Crosse and Town of Medary, North/South sections of French Island/Campbell for Fire protection
Total Calls (2019)	6,837	
Total Budget	\$9,374,079	Fire/EMS (excludes est Inspection costs, 10% of total)

## Onalaska Fire Department

Onalaska FD is a municipal department that services both the city and town of Onalaska. It is staffed with a combination of both career personnel and POC staff. Onalaska's service area for fire is the entire city and a small portion of the town of Onalaska.

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<sup>16</sup> La Crosse FD has 114 total FTEs according to payroll documents, but 16 of those are building inspectors and are not counted here.



### *Onalaska FD, At a Glance*

		Notes
Number of Stations	1	Discussion of building one near the mall
Total FTE (including hourly)	25.03	
Staff on Shifts	4	Average
Population Served (Est)	18,988	City of Onalaska and portions of the town of Onalaska
Total Calls (2019)	1,553	
Total Budget (2020)	\$1,709,446	

## Holmen Area FD

The Holmen Area Fire department is an independent fire district that covers the village of Holmen, town of Holland, and portions of the town of Onalaska. Holmen Area FD is staffed with both career and part-time employees. While service demands are increasing in and around Holmen, the organizational model of serving three different municipalities complicates the department's ability to address funding challenges. As a consequence, Holmen Area FD has less of an ability to address ancillary services such as fire inspections, plan review, and strategic planning. New development in the northern part of the service area is problematic since response times are longer there for both Holmen Area FD and Tri-State.

### *Holmen Area FD, At a Glance*

		Notes
Number of Stations	1	Considering the need for one additional station
Total FTE (including hourly)	8.29	
Staff on Shifts	2	1 day shift 1 Command/Supervisor on staff as well
Population Served (Est)	19,945	Village of Holmen, town of Holland, and portions of the town of Onalaska
Total Calls (2019)	1057	
Total Budget (2020)	\$753,350	



## Shelby Fire Department

The Shelby Fire Department, part of the town government of Shelby, is a volunteer fire department licensed at the EMR level. The department's two stations serve Shelby and about 90% of the town of Greenfield. Shelby FD has a large POC roster of 43 personnel. Shelby FD also conducts safety inspections and plan reviews. Personnel are trained in HazMat response and water rescue.

### *Shelby FD, At a Glance*

		Notes
Number of Stations	2	One in Shelby and one in Greenfield at St Joseph's Ridge
Total FTE (including hourly)	2.3	43 PT
Staff on Shifts	NA	
Population Served (Est)	6,882	Town of Shelby, Town of Greenfield
Total Calls (2019)	330	
Total Budget	\$169,500	Excludes \$45,000 in hydrant rental

## La Crescent FD

The La Crescent Fire Department is a volunteer department housed within La Crescent, Minnesota city government. La Crescent FD is licensed at the EMR level and provides fire and EMS first responder service to the city and township of La Crescent and portions of the townships of Dresbach and Mount Prairie. Unlike the La Crosse County departments, La Crescent FD is dispatched out of Houston County, MN. Tri-State provides ALS and all transport services for the La Crescent FD.

### *City of La Crescent FD, At a Glance*

		Notes
Number of Stations	1	
Total FTE (including hourly)	2.3	
Staff on Shifts	NA	27 POC
Population Served (Est)	5,392	City of La Crescent, township of La Crescent, portions of Mound Prairie and Dresbach townships
Total Calls (2018)	400	375 were EMS, 25 were fire
Total Budget	\$250,060	Fire/EMS, net of capital





## Tri-State Ambulance Service

Tri-State is a non-profit corporation that provides 911 response and transport to 2,200 square miles in Minnesota and Wisconsin. It is licensed at the paramedic level and staffs six ambulances in La Crosse County during the day and four at night. Tri-State also provides all ambulance facility transfers. Tri-State sponsors EMS training and provides medical direction to first responders.

### *Tri-State, At a Glance*

		Notes
Number of Stations	3	
Total FTE (including hourly)	42	Shift Staffing ratio of 4.0
Staff on Shifts	10.5	12 during the day and 9 at night
Population Served (Est)	102,742	Study areas only
Total Calls (2019)	9,116	Study areas only
Total Budget	\$4,110,116	For entire county

## Brice Prairie First Responders

Brice Prairie First Responders is a standalone EMR non-profit agency that provides EMR services to the census designated place of Brice Prairie within the town of Onalaska's borders. Brice Prairie is a volunteer agency which has been serving the area for more than 30 years. ALS services and transports are handled by Tri-State Ambulance.

### *Brice Prairie First Responders, At a Glance*

		Notes
Number of Stations	1	
Total FTE (including hourly)		
Staff on Shifts	NA	12 volunteers
Population Served (Est)	~ 2,000	Brice Prairie, CDP (town of Onalaska), Lake Onalaska (town of Onalaska) Great River State Bike Trail (town of Onalaska, town of Holland)
Total Calls (2018)	70	
Total Budget	NA	EMS only



## Farmington Emergency Medical Team

The Farmington Emergency Medical Team is a stand-alone EMR non-profit agency that has been operating since 1928. In 2014, Farmington EMT merged with North Bend EMT, creating an organization that serves two communities in two counties. Farmington EMT is a volunteer agency.

### *Farmington First Responders, At a Glance*

		Notes
Number of Stations	1	
Total FTE (including hourly)		17 Volunteers
Staff on Shifts	NA	
Population Served (Est)	~ 2,100	Town of Farmington, town of North Bend in Jackson County
Total Calls (2018)	98	
Total Budget	\$53,000	EMS only



**Attachment 9**

**Correspondence between City and Town**

Inserted on subsequent page(s).

# TOWN OF CAMPBELL

La Crosse County



2219 Bainbridge Street, La Crosse, WI 54603  
Phone: 608/783-0050  
Facsimile: 608/779-9398  
Email: [campbellwi@townofcampbellwi.gov](mailto:campbellwi@townofcampbellwi.gov)

January 4, 2022

Mayor Mitch Reynolds  
City of La Crosse  
400 La Crosse Street  
La Crosse, WI 54601

Dear Mayor Reynolds,

As you and I have discussed, the Town of Campbell would like to modify and extend the agreement with the City that provides for Water service to properties within the Town. That *Water and Fire Service Agreement* which is scheduled to expire on January 1, 2025 contains provisions unrelated to water and has features that are unfair to customers in the Town. I know you would like to see a proposal from the Town of Campbell and before submitting a more formal proposal, I wanted to outline some of the provisions that the Town believes are important and need to be addressed in a new agreement. Those provisions are listed below in no particular order.

1. Fire protection by the City does not need to be included. The Town Fire Department is capable of providing basic service to the Town. A mutual-aid provision among all area fire departments has significant value to all municipalities, but La Crosse does not need to provide exclusive service to any part of the Town.
2. The Town of Campbell would like this agreement to provide water service to all Campbell customers including Residential, Commercial, Industrial and Public and not limited to just Commercial.
3. The Town of Campbell would like this agreement to provide water service to the entire Town rather than just limited areas.
4. Campbell will continue to construct and own all of the Town mains and services. Where the Town's distribution system is modified to benefit the La Crosse distribution system, costs may be shared pursuant to an agreement between the City and Town.
5. The City Water Utility currently provides operation and maintenance and bills customers directly. Campbell prefers to operate and maintain the system within the Town and handle the billing. The Town would purchase water from the City on a wholesale basis, add our operations cost and bill Town customers. Since it's not practical to meter water at an entry point, water usage would be measured at the customer's meter.
6. The wholesale rate, determined by the PSC, must exclude the costs for services not provided by La Crosse.
7. The extra Fire Fighting and Equipment Service fee charged by the City is no longer applicable and needs to be deleted since the Town would be providing its own fire protection.
8. The Agreement needs to remove all references to boundaries and annexation as those provisions are completely unrelated to water service. Any new agreement would terminate all of the provisions of the previous agreement related to boundaries or annexation.

If the City is willing to discuss an agreement that includes these considerations, the Town will provide a more formal draft agreement for further discussion. The Town believes that continued water service which is practical is

important to the existing customers and also important to the Town as we consider ways to address "PFAS-contaminated water" issues that have impacted much of the Town.

I look forward to working with you to come up with an agreement that is beneficial to the City and the Town as we work together to provide clean water to all of the citizens in our communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Johnson", written in a cursive style.

Josh Johnson



OFFICE OF THE MAYOR  
LA CROSSE

September 23, 2022

Joshua Johnson, Chairman  
Campbell Town Hall  
2219 Bainbridge Street  
La Crosse, WI 54603

Email: [JJohnson@townofcampbellwi.gov](mailto:JJohnson@townofcampbellwi.gov)

Dear Chairman Johnson,

Thank you for your recent correspondence related to establishing a municipal water supply for the Town of Campbell.

As we discussed during the August 15<sup>th</sup> meeting in my office with you, Cassandra Hanan, Mitch Brohmer and Brian Weber, the City of La Crosse Water Utility can potentially provide water service in a wholesale agreement to the Town of Campbell. This is not possible under some of the conditions of the Draft Agreement submitted to the City by the Town. The concerns that prevent us moving forward—some of which I raised at our meeting—include the following:

1. A requirement by the Town for the City to test water beyond and inconsistent with state requirements
2. A requirement by the Town for the City to permanently disconnect certain wells, rendering those assets useless for future use
3. A requirement to terminate annexation provisions in a prior agreement
4. A limitation by the Town on discussions of revenue sharing provisions
5. A termination restriction that is based on securing an “equivalent water service”
6. A condition that removes the possibility of the Town waiving claims against the City for damages to groundwater water sources that would no longer be in use
7. The inability of the Town to aptly and definitively identify how a water agreement would survive incorporation by the Town. The desire to pursue such an incorporation has been expressed repeatedly by Town representatives. A clear obligation to uphold any agreement as a village after incorporation remains unclear

The City is willing to continue to discuss a potential wholesale water agreement with the above as key points to guide the process moving forward. Other issues of concern may also be considered.



As we also discussed at our meeting on August 15<sup>th</sup>, the City can offer other pathways forward that may help some or all of the town connect to a municipal water supply:

1. As soon as practicable, City Water connections can be made to the area immediately south of the La Crosse Regional Airport. Those connections are contingent on annexation of connecting properties and would require amendment of prior agreement(s). Annexation is an equitable acknowledgement of former Town properties that were previously annexed into the City in order to access municipal water. Those property owners have helped fund City services since joining the municipality. The same expectation would be in place for others seeking City Water.
2. Consideration of conveyance of Well 26 to the Town of Campbell to assist in establishing critical infrastructure for the Town's own Water Utility. This significant asset of the City is linked to a current federal funding allocation for treatment of PFAs chemicals. That funding amount is approximately \$3.7 million. This is the City's newest well and would provide more than adequate volume for all users in the Town. The City could also provide emergency backup service for the Town that would limit the need of the Town to find an appropriate location for a new well.

Please let me know if you would like to discuss any of these issues further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mitch Reynolds', with a long, sweeping horizontal line extending to the right.

Mayor Mitch Reynolds

MR:cr

cc: Cassandra Hanan, [CHanan@townofcampbellwi.gov](mailto:CHanan@townofcampbellwi.gov)

# TOWN OF CAMPBELL

La Crosse County



2219 Bainbridge Street, La Crosse, WI 54603  
Phone: 608/783-0050  
Facsimile: 608/779-9396  
Email: [campbellwi@townofcampbellwi.gov](mailto:campbellwi@townofcampbellwi.gov)

October 6, 2022

Mayor Mitch Reynolds  
City of La Crosse  
400 La Crosse St.  
La Crosse, WI 54601

Dear Mayor Reynolds,

We have spent almost all of 2022 trying to make progress on a new Water Agreement with the City. Your September 23, 2022, letter (attached) seems to be a serious step backwards toward our goal of providing safe drinking water to the Town of Campbell. You are raising issues and concerns that were discussed and accepted very early in this process. It's looking like the Town has wasted months of time that could have been used to implement other options.

Referencing the specific concerns in your letter:

1. *"A requirement by the Town for the City to test water beyond and inconsistent with state requirements"*. This apparently references item 2k in the draft agreement, "Within 120 days of the approval of this agreement, La Crosse shall have all the La Crosse water supply wells sampled for PFAS and report the results to Campbell. This analysis shall be done at the Wisconsin State Lab of Hygiene." When this was inserted last spring, all Wisconsin water utilities had recently been invited to submit water samples for free PFAS analysis by the State Lab of Hygiene ([Voluntary Drinking Water PFAS Sampling Project For Municipal Systems | Wisconsin DNR](#)). With the known PFAS contamination in La Crosse, we were certain the City would participate in this no-cost opportunity and Campbell would be able to receive those results. If you missed that chance, your existing Water customers, and the new customers in Campbell, certainly deserve assurance that the City's Water Utility is checking to see that their water supply is safe to use.
2. *"A requirement by the Town for the City to permanently disconnect certain wells, rendering those assets useless for future use"*. This was already discussed and then addressed in our September 1, 2022, letter (attached) to you. "Disconnect Wells 23, 24 and 26. With enforceable standards for PFAS/PFOA being implemented, Campbell is willing to consider ways that the contaminated wells can continue in service. Certainly, La Crosse wants to deliver safe water to all your customers and there may be treatment and distribution techniques that can do this with Campbell users receiving the same quality of water as other La Crosse customers." The agreement may be edited once you describe your plans for future use of those wells.
3. *"A requirement to terminate annexation provisions in a prior agreement"*. This is not new. Since the very start of our discussions, removing all references to annexation has been an essential element for a Water Agreement. Our January 4, 2022, letter (attached) included a confirmation of our requirement, "The Agreement needs to remove all references to boundaries and annexation as those provisions are completely unrelated to water service. Any new agreement would terminate

all of the provisions of the previous agreement related to boundaries or annexation". If the City is reneging on this aspect, the Town is not interested in further discussions.

4. *"A limitation by the Town on discussions of revenue sharing provisions".* We are discussing a Water Agreement. The Campbell Water Utility wants to purchase wholesale water from the La Crosse Water Utility using PSC determined rates. There have been no requests or discussions about any "revenue sharing" until now. If they intent is to charge Campbell Water customers some sort of extra fee that has nothing to do with Water, the answer is no.
5. *"A termination restriction that is based on securing an 'equivalent water service'".* The draft Agreement (attached) includes a provision that, "Termination will only be effective when equivalent water service is provided by another entity". This is actually a limitation on the Town and acknowledges that once municipal water service is provided, there is no going back. It would allow the Campbell Water Utility to develop their own water supply and storage facilities and stop using City water. That would require a major capital investment, estimated to be more than \$20,000,000, and would only be considered if necessary to provide safe and cost-effective service to the Town customers.
6. *"A condition that removes the possibility of the Town waiving claims against the City for damages to groundwater water sources that would no longer be in use".* The intent is to have a Water Agreement, separate from any discussions about PFAS contamination. PFAS contamination is a complex issue with the ramifications not fully realized yet. Our goal is to implement a drinking water solution as quickly as practicable. A large number of Campbell residents are now dependent on bottled water. Their access to water is severely limited and their property values have been negatively impacted. They want action, not rhetoric and excuses. Everyone is aware that the City's airport is the source of the problem. It's in the City's best interest to fix the problem as quickly and cost-effectively as possible. Trying to leverage a problem created by the City to the City's advantage is insulting to the Town of Campbell.
7. *"The inability of the Town to aptly and definitively identify how a water agreement would survive incorporation by the Town. The desire to pursue such an incorporation has been expressed repeatedly by Town representatives. A clear obligation to uphold any agreement as a village after incorporation remains unclear".* We have addressed this several times. The Town believes that a Water Agreement will survive any incorporation of the Town. In addition, there is no reason for the Town to want to the agreement to die. There is simply no relevant law or case law that directly addresses your concern; this is not the result of the "inability of the Town" to make this clear. While the Town has provided the reasoning for why it believes the Water Agreement would survive incorporation, there is no case directly on point with this issue because no one in the position of the Town of Campbell would ever try to terminate an agreement of this type once it entered into it. Consequently, this specific issue has not been litigated to the best of our knowledge. If the City needs further assurance, that will need to be done by your legal staff.

Related to the "other pathways" in your letter:

1. Requiring annexation to the City to obtain Water service is not an option. Do you really believe that those Campbell residents most severely impacted by the City's contamination would want to join the City now?
2. In the future, there may be some interest in your offer to transfer City Well 26H to the Campbell Water Utility, but not now. Picture this from a Town resident's perspective...The City has contaminated the groundwater. That limits its use by both the Town and the City. The City wells on French Island are not in service due to PFAS contamination. The City has excess capacity and is willing to give one of those (contaminated) wells to Campbell for use by Campbell residents...There is simply no way anyone in the Town would see that as a good solution. We realize that treatment is possible and funds are available for that, but our residents will not accept this water source as their supply at this point.

A joint Water project is more cost-effective than an independent Campbell system and has mutual benefits. The Town has always supported working with the City on a joint Water project, making contact with the La Crosse Water Utility early in 2021. The City was initially reasonable and cooperative but has been slow to respond and now brings up unrealistic expectations late in the process. Campbell continues to be willing to negotiate with you but also needs to work toward alternative solutions. We are planning a Test Well to help confirm the viability of an independent water supply.

Sincerely,

Joshua Johnson  
Chairman  
Town of Campbell