Requested action: Delay action on File No. 26-0513 until the applicant provides a site-necessity and alternatives analysis addressing whether the proposed office/warehouse/operations use can be reasonably accommodated in nearby vacant industrial or commercial space.

City of La Crosse
Common Council / Judiciary & Administration Committee / Plan Commission

Re: File No. 26-0513 — Proposed Rezoning for 1325 St. Andrew Street

Dear Council Members and City Staff,

I am writing regarding File No. 26-0513, the proposed rezoning of 1325 St. Andrew Street from Planned Development District - General to Planned Development District - General & Specific. I received notice of the proposed amendment because my property at 1401 St. Andrew Street is located within 300 feet of the subject property.

I want to be clear at the outset that my concern is not with Borton Construction as a company. Borton is an important local business with a long history in the area, and they have completed many strong projects in La Crosse and the surrounding region. I want Borton to continue to succeed and grow. Construction companies have legitimate needs for office space, warehouse space, loading areas, storage, and operational facilities. Those are real business needs, and I support finding appropriate ways to meet them.

This request is made without prejudice to Borton Construction's ability to grow, relocate, or pursue an appropriate facility elsewhere. My concern is whether this particular parcel is the right place to satisfy that need.

The decision standard should not be whether this project is better than vacant land, or whether the proposed building is useful to the applicant. Almost any new building can satisfy those tests. The better standard is whether this is the appropriate long-term use of a remediated, high-potential redevelopment parcel when the same operational need may be met in existing industrial space nearby.

For that reason, I respectfully ask the City to delay action on this rezoning unless and until the applicant provides a site-necessity and alternatives analysis showing why the proposed office/warehouse/operations use cannot reasonably be accommodated in existing vacant industrial or commercial space nearby. If the City chooses to approve the rezoning, I ask that it make specific findings on the record explaining why this use is appropriate for this parcel despite the site's location, redevelopment history, nearby residential investment, and apparent availability of existing industrial space.

The City's own public notice describes the proposed use as a "mixed-use building with office space, warehouse, and operational facilities," and states that the rezoning is necessary to allow "office space, warehouse, & operational facilities." That language is important. While the

proposal is described as “mixed-use,” the actual use identified in the notice is office, warehouse, and operational space.

Based on the submitted plans, the project appears to be a single-story, single-user office/warehouse facility with a large warehouse component, overhead doors, a mezzanine, surface parking, and covered outside storage. That may be a functional building for Borton today. The question for the City, however, is not simply whether the building works for the applicant. The question is whether this is the best long-term land use for a prominent redevelopment parcel next to recent residential investment.

That distinction matters because the City’s own planning framework emphasizes long-term land-use decision-making. The City describes Forward La Crosse 2040 as its “official long-term strategy” for how the community should “grow, develop, and invest in infrastructure” over the next 15 to 20 years. The City also states that the plan guides decisions about land use, housing, transportation, economic development, heritage preservation, and environmental sustainability.

The immediate context matters as well. This parcel is not an isolated industrial lot. It sits on a visible St. Andrew Street redevelopment site, near George Street, adjacent to recent residential investment, and within an area transitioning from older industrial uses toward a broader mix of housing, commercial, and redevelopment activity. That makes the long-term land-use decision more important, not less.

This rezoning should not be treated as a routine site-plan approval or judged only against the current vacant condition. The better question is whether this proposal advances the City’s long-term land-use, housing, redevelopment, economic-development, and tax-base goals.

Housing is especially relevant. The City has publicly stated that a 2024 housing study identified the need for 1,500 new housing units by 2030, including homes, condominiums, apartments, rentals, and owner-occupied units. City staff also stated that “every new development or housing opportunity truly makes a difference.” A prominent redevelopment parcel next to recent residential investment should be evaluated in light of that need.

The strongest issue, in my view, is that this proposed use does not appear to be site-dependent. Office, warehouse, loading, storage, and operational functions are exactly the types of uses that can often be accommodated in existing industrial buildings. There appears to be substantial vacant industrial space directly adjacent to or near the property, potentially 58,000 square feet. Before the City approves a rezoning that may commit this prominent parcel to a new single-user office/warehouse/operations building, the applicant should be asked to explain why nearby vacant industrial space cannot reasonably meet the same need.

I also want to be transparent that my property at 1401 St. Andrew Street may be one of the nearby industrial spaces reflected in that broader vacancy context. I am not asking the City to deny this rezoning so that any specific property owner benefits, and I am not presenting this as a private leasing dispute. My point is broader: before approving new construction of a single-user office/warehouse/operations facility on a prominent redevelopment parcel, the City

should determine whether the same operational need can reasonably be met through existing industrial building stock nearby.

This is not an anti-Borton position, and it is not a request that the City choose one private property owner over another. It is a planning question. If Borton's space needs can be met in existing industrial building stock, that would support a local business while preserving this high-potential parcel for a use that better advances the City's long-term goals.

There are many potential uses for this parcel that would appear more consistent with the City's long-term planning goals than a single-user office/warehouse/operations facility. The site could potentially support housing, residential-over-commercial mixed use, missing-middle housing, workforce housing, senior housing, live/work units, neighborhood-serving commercial space, a small business incubator, professional services, or another more adaptable use. I am not asking the City to redesign the project from the dais, but the range of plausible alternatives shows why this rezoning deserves careful scrutiny. Once this parcel is committed to a low-intensity contractor operations building, the opportunity for a more housing-supportive, tax-productive, and plan-consistent use may be lost for decades.

I also ask the City to carefully consider the public investment and redevelopment history of this site before taking final action. My understanding is that significant public dollars and public effort may have been used for environmental remediation, site preparation, infrastructure, and making this former industrial property developable. If so, the public return on that investment should be part of the rezoning discussion. I am not assigning responsibility for the historic contamination to Borton Construction or any current applicant. My concern is with the long-term public return on a difficult and publicly supported redevelopment site.

If public resources helped make this parcel developable, then the future use of the land deserves more than a "better than vacant" analysis. The City should ask whether the proposed use provides an appropriate long-term public return compared with housing, true mixed-use development, residential-over-commercial development, neighborhood-serving commercial space, or another more tax-productive and adaptable use.

I am also concerned about long-term adaptability. The submitted plans appear to be very specific to the applicant's immediate operational needs. The office layout is tailored to one user, and the overall building program is organized around a specific office/warehouse/operations model. That may work well today, but business needs change. Staffing changes. Storage needs change. Operational needs change. A building designed around one user's current needs may not be easily adaptable to future users, especially on a site with known redevelopment constraints.

Before approving the rezoning, I respectfully ask the City to make specific findings on the record regarding the following:

Whether the proposed use is truly site-dependent;

Whether nearby vacant industrial or commercial space could reasonably accommodate the applicant's needs;

Whether the proposed building and site plan are adaptable to future users;

Whether the proposed use advances the City's long-term land-use, housing, redevelopment, economic-development, and tax-base goals;

Whether the long-term public return justifies committing this parcel to a low-intensity, single-user office/warehouse/operations facility.

If the City chooses to approve the rezoning, I ask that approval include strong conditions, including:

No outdoor storage beyond what is specifically approved on the plans;

No visible equipment, trailer, or material staging from public streets or neighboring properties;

Strict screening of warehouse, loading, service, and operational areas;

Limits on truck traffic, noise, lighting spillover, and hours of operational activity;

Enhanced architectural treatment on all sides visible from public streets or neighboring properties;

A stronger St. Andrew Street frontage that contributes to the surrounding area rather than simply screening a warehouse use;

Clear limitations preventing the site from becoming a broader contractor yard or outdoor equipment/material storage facility.

Again, my objection is not to Borton Construction needing space or continuing to grow. I want them to be successful. My concern is with using this particular parcel for a low-intensity, single-user office/warehouse/operations facility without first demonstrating that the same need cannot reasonably be met through existing industrial space or adaptive reuse.

La Crosse needs housing, stronger tax-base productivity, and thoughtful redevelopment. Borton needs functional space. Both goals can be legitimate at the same time. The City should be careful before approving a rezoning that may solve one private space need while foreclosing a larger public redevelopment opportunity for decades.

Respectfully,

Scott Ervin
1401 St. Andrew Street
La Crosse, WI

EXHIBIT A - City and Planning Language Relevant to File No. 26-0513

1. Public Notice Language for File No. 26-0513

The City's public notice describes the request as a rezoning necessary to allow a "mixed-use building with office space, warehouse, and operational facilities." It further states that the rezoning is necessary to allow "office space, warehouse, & operational facilities."

Relevance: This language shows that the practical land use before the City is office, warehouse, and operational space. The "mixed-use" label should not obscure the fact that the proposed use functions as a single-user office/warehouse/operations facility.

2. Forward La Crosse 2040 Comprehensive Plan

The City describes Forward La Crosse 2040 as its "official long-term strategy" for how the community should "grow, develop, and invest in infrastructure" over the next 15 to 20 years. The City states that the plan guides decisions about land use, housing, transportation, economic development, heritage preservation, and environmental sustainability.

Relevance: File No. 26-0513 is not merely a private building plan. It is a long-term land-use decision on a prominent redevelopment parcel. The rezoning should be evaluated against the City's own long-term growth, land-use, housing, economic-development, and infrastructure goals.

3. Site Context: St. Andrew Street / George Street / Nearby Residential Redevelopment

The subject property is a visible redevelopment parcel on St. Andrew Street, near George Street, and adjacent to recent residential investment. The surrounding area includes former industrial property, newer residential redevelopment, and existing industrial/commercial building stock.

Relevance: This context makes the rezoning a long-term land-use decision, not merely a private building approval. The City should evaluate whether a single-user office/warehouse/operations facility is the best use of this parcel compared with housing, true mixed-use development,

adaptive reuse of nearby industrial space, or another more tax-productive and neighborhood-supportive use.

4. City Housing Need Statement

The City has publicly stated that a 2024 housing study identified the need for 1,500 new housing units by 2030, including homes, condominiums, apartments, rentals, and owner-occupied units. City staff stated that "***every new development or housing opportunity truly makes a difference.***"

Relevance: A prominent parcel next to recent residential redevelopment should be evaluated in light of the City's housing need. The proposed office/warehouse/operations facility does not add housing units and may foreclose a future housing-supportive or true mixed-use opportunity.

5. Submitted Site Plans

The submitted plans show a single-story Borton Construction building with office space, warehouse space, a mezzanine, overhead doors, surface parking, and covered outside storage.

Relevance: The plans support the conclusion that the proposal is a highly specific single-user office/warehouse/operations facility rather than a true mixed-use redevelopment project with housing, public-facing commercial space, or active neighborhood frontage.

EXHIBIT B - Nearby Vacant Industrial / Commercial Space Inventory

Purpose: To support the request that the City require a site-necessity and alternatives analysis before approving File No. 26-0513.

The proposed use includes office, warehouse, loading, storage, and operational functions. These are the types of uses that may be able to fit within existing industrial or commercial building stock. Before approving new construction on a prominent redevelopment parcel, the City should require the applicant to explain why nearby vacant industrial or commercial space cannot reasonably accommodate the same need.

Potential Nearby Available Space

1. Address: 1102 Island Street
   Approximate vacant square footage: 4900
   Approximate distance from 1325 St. Andrew Street: 1500
   Relevant features: loading / overhead doors / warehouse area / office area / parking /
2. Address: 2320 Cunningham St
   Approximate vacant square footage: 9100
   Approximate distance from 1325 St. Andrew Street: 2.6 Miles
   Relevant features: loading / overhead doors / warehouse area / office area / parking / truck access

3. Address: 1501 St Andrew St, La Crosse, WI 54603
   Approximate vacant square footage: 18000
   Approximate distance from 1325 St. Andrew Street: 300
   Relevant features: loading / overhead doors / warehouse area / office area / parking / truck access / Screened Outdoor Storage
4. Address: 1401 St Andrew St, La Crosse, WI 54603
   Approximate vacant square footage Vacant : 26000
   Approximate distance from 1325 St. Andrew Street: 50
   Relevant features: loading / overhead doors / warehouse area / office area / parking / truck access

Approximate total nearby vacant industrial/commercial space identified: 58,000 square feet.

Conclusion: If substantial vacant industrial or commercial space exists directly adjacent to or near the subject property, the City should require the applicant to demonstrate why those spaces are not reasonably feasible before approving a rezoning that may commit 1325 St. Andrew Street to a new single-user office/warehouse/operations facility.

Note: 1401 St. Andrew Street is owned or controlled by the submitting property owner. It is included in this inventory for transparency because it is part of the nearby industrial building stock that may be relevant to a site-necessity and alternatives analysis. Its inclusion is not intended as a request that the City direct or favor a private leasing outcome.

EXHIBIT C - Requested Findings and Conditions if Rezoning Proceeds

Requested Findings Before Approval

Before approving File No. 26-0513, the City should make specific findings on the following:

1. Whether the proposed office/warehouse/operations use is truly site-dependent.
2. Whether nearby vacant industrial or commercial space could reasonably accommodate the applicant's needs.
3. Whether the proposed building and site plan are adaptable to future users if the applicant's needs change.
4. Whether the proposed use advances the City's long-term land-use, housing, redevelopment, economic-development, and tax-base goals.
5. Whether the long-term public return justifies committing this parcel to a low-intensity, single-user office/warehouse/operations facility.

Requested Conditions if Approved

If the City approves the rezoning, approval should include conditions to prevent the site from functioning as a broader contractor yard or unscreened operational facility, including:

1. No outdoor storage beyond what is specifically approved on the plans.

2. No visible equipment, trailer, or material staging from public streets or neighboring properties.
3. Strict screening of warehouse, loading, service, and operational areas.
4. Limits on truck traffic, noise, lighting spillover, and hours of operational activity.
5. Enhanced architectural treatment on all sides visible from public streets or neighboring properties.
6. A stronger St. Andrew Street frontage that contributes to the surrounding area rather than simply screening a warehouse use.
7. Clear limitations preventing the site from becoming a broader contractor yard or outdoor equipment/material storage facility.