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June 11, 2024

City Plan Commission
809 N. Broadway
Milwaukee, WI 53202

Zoning and Neighborhood Development Committee
200 E. Wells St.
Milwaukee, WI 53202

RE: Files 231461 & 240199: Proposed Rezoning of Properties along W. St. Paul Ave.

Dear City Plan Commissioners and Members of the Zoning and Neighborhood Development Committee,

On behalf of Menomonee Valley Partners, I am writing to share our opposition to both the newly proposed amendment to the City-adopted Menomonee Valley Area Comprehensive Plan (File 240199) in addition to the rezoning of 324 N. 15th St. to IM in order to permit residential units in the at this property (File231461). This would be **in direct conflict with the City's adopted recommendations in the Valley Plan (1998), the Valley 2.0 Plan (2015), and the City-wide Industrial Land Analysis (2021)**, all of which were informed by significant public engagement, unlike these two proposals.

We all agree that this building is a challenge for everyone, and something needs to change. **We firmly believe that there is a solution that works for all parties and have been working in good faith with Mr. Breunig toward that.** Only since the proposal to redevelop for high-end housing got traction has MVP been brought into discussions on the property, because we have been representing the voice of many stakeholders – business, residents, neighborhood associations, employees – who have been engaged in the visioning and implementation of the plan for the Valley, which clearly and explicitly states residential is not desired because of the conflicts it poses for existing uses.

Since then, MVP has been making a concerted effort to work with the developer to find a solution that could be a win for everyone: redeveloping the building in a way that is compatible with the surrounding area and in keeping with the vision of the community as codified in the comprehensive plan. We acknowledge that commercial development here could be more costly, and have committed to help Mr. Breuning secure resources to offset these costs. We have already met with him and consultants to identify resources to offset environmental costs; we have been exploring funding possibilities for the structural work the building requires; and have offered to put everything we have into marketing the property to commercial tenants.

MVP has a strong record of doing all of these things when we are brought to the table as a partner. We did this work for the former Milwaukee Road Shops, now the Menomonee Valley Industrial Center, for the former Milwaukee Stockyards, now the Canal Commerce Center, and for the former railyard and vacant bar that are now Three Bridges Park and the Urban Ecology Center. We know that projects like this take partnership and a shared vision because we have done this elsewhere on sites even more complicated than this.

The City has established a long-standing policy recommendation through City-adopted neighborhood plans. **These plans designate and safeguard land in the Menomonee River Valley exclusively for commercial and industrial uses, separate from residential uses, through clear zoning delineation. Upending this policy decision would open a Pandora's box of issues and set a dangerous precedent of throwing out a plan whenever a site is complicated** and someone sees an “easy” solution. This body has rejected this type of thinking historically, i.e., holding to the plan when BuyCostumes proposed purchasing the west end of the Valley for a distribution center which would have developed the land but missed every job creation and living wage goal set in the Valley Plan. **By sticking to what is arguably the most successful land use plan in Milwaukee, the City was able to exceed every one of its goals – job creation, wages, and tax base. The work of doing this has paid off again and again.**

This Commission should know that these rezoning proposals are already having a chilling effect. MVP has heard from multiple businesses that feel that the City is signaling that the Valley could no longer be the place for job growth it has been for the past 25 years. **Businesses are asking us if they should think about future investment happening elsewhere.** There are real consequences that will continue to ripple out from this. **If residential uses are allowed here, this would create the expectation that rezoning can happen anywhere, giving manufacturers—who make up the heart of the Valley’s economy every indication that manufacturing’s future is uncertain here.**

This also would set a precedent for the City that is already of concern from other neighborhoods. Several other Industrial BIDs have sent their concerns to the file, noting that the Industrials BIDs gave considerable time and energy, along with other policy makers, economic development, workforce development, real estate, and others, to develop a City-wide Industrial Land Analysis. Intentionally working against the recommendations clearly stated in that plan, as this proposed land use amendment does, not only threatens the Valley, but threatens every industrial area of this city. **If the City intends to live up to its goals of addressing workforce challenges, racial segregation, and racialized wealth disparities, be clear that you undermine those goals when threatening the companies that provide sustainable jobs and pathways for advancement by displacing them for high-end housing.**

This policy decision comes down to whether to uphold the City’s policy that supports long-standing businesses, good jobs for Milwaukee residents, and public health and safety. We stand firm in our opposition to this rezoning request yet also continue to express our willingness to help achieve an alternative use for this property that complies with the policies that have been set by nearly three decades of neighborhood planning and precedent.

Sincerely,

A handwritten signature in black ink, appearing to read "Carey Zelt". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Executive Director
Menomonee Valley Partners