RE: (240402) Comprehensive Planning - Public Hearing 1:30 PM, A substitute ordinance adopting the Growing MKE Plan as the Housing and Neighborhoods Element of the Citywide Policy Plan as part of Milwaukee's Overall Comprehensive Plan, and directing implementation.

May 29, 2025

Common Council President Jose Perez

Chairman, Zoning, Neighborhoods and Development Committee - Alderman Robert Bauman

President Perez and Chairperson Bauman:

We applaud your efforts to slow down the Mayor's Growing MKE (now newly branded as the Housing Element) plan to allow for greater transparency and public input. We also applaud your thoughtful move forward with the new R-5 zoning district concept that will require any implementation of the new district to pass the scrutiny of neighborhood property owners/residents as well as the City Plan Commission and Common Council. This is the type of transparent, public participation that the people of Milwaukee expect when City Hall makes drastic changes to their living environment.

Unfortunately, the confusing and ever-changing administration scheme to allow external and internal ADU's (Accessory Dwelling Units) without any neighborhood input or design standards in single-family districts throughout the city have not enjoyed the same transparency and public input. In fact, allowing internal ADU's by-right as called for in Housing Element in single-family districts is directly contrary to the concession made by the Mayor and DCD to keep hands-off single-family districts. We were led by the administration they were going to put home ownership ahead of more density and out of town landlords.

As outlined in this article, link below, the administration claims to have listened to the public by not compromising home ownership. But the new plan to allow internal ADUs by- right is nothing more than a bait-and-switch tactic.

 $\frac{\text{https://urbanmilwaukee.com/2025/05/01/city-revises-its-growing-mke-plan-including-changing-the-name/\#google_vignette}{\text{name/\#google_vignette}}$

Their ADU scheme is nothing more than a back door doubling of density in Milwaukee's most stable family neighborhoods, many of which are home to the metro area's largest concentration of Black, Latino, Hmong, and other minority populations. Neighborhoods like Sherman Park, Rufus King, Golden Gate, Columbus Park, Capitol Heights, Jackson Park, Town of Lake, Copernicus Park, Heritage Heights, Story Park, Halyard Park, Jackson Park, Fairview, Tippecanoe, Euclid Park and many others are unaware of the scope of the change and unprepared for the negative impacts on their properties. Homeowners in every Aldermanic District would see their density double overnight with a stroke of a pen and no neighborhood input.

Statistics show that home ownership in single-family districts hovers around 75%, while in two-family districts it is reduced by a third to less than 50%. The new by-right ADU plan is a major opportunity for out-of-state property owners to scoop up properties and double their money on the backs of Milwaukee's most vulnerable – and to work against the laudable goal of home ownership.

Ironically, a property owner in these neighborhoods needs to apply for a variance from BOZA to put up a six-foot fence in their front yard (requiring written/mailed notification and input from their neighbors) but this poorly conceived plan would create a scenario in which turning their house into a duplex or BUILDING A WHOLE SECOND HOUSE ON THE SAME LOT could be done with no Aldermanic or neighborhood input!!!!

The larger goals of Growing MKE and/or Housing Element are noble - diversify housing options to allow for greater affordability and accessibility for all city residents to all neighborhoods. Public/Private efforts like those spearheaded by Community Development Allies and Herb Kohl Charities in Harambee are doing the heavy lifting of achieving these goals. The creative housing TIF recently passed by the Council is another example of an actionable change that will create quality housing where it is most needed. However, in a city with shrinking population, thousands of acres of empty land and hundreds of underutilized homes/buildings there is no need to destabilize safe, owner-occupied neighborhoods to achieve this goal. You don't have to threaten home ownership to build more units, of all kinds, on vacant and underutilized land throughout our city. Upzoning stable owner-occupied single-family districts under the guise of ADU's will not contribute to these goals and will instead undermine residents and neighborhoods. There is no evidence that the impediment to growth and affordable housing in Milwaukee is the zoning code. For years, survey after survey, study after study has shown that the greatest impediment to our growth is quality of education and safer streets. Adopting Growing MKE/Housing Element and adding a provision for ADU's with no neighborhood input will do absolutely nothing to improve our schools, make our streets safer or attract more families to Milwaukee. In fact, it will do the opposite as the administration prioritizes renters over homeowners.

We respectfully request that before any further action is taken on the ADU file or any major change to Milwaukee's zoning code, that surveys are sent to homeowners of the impending change, soliciting their input and explaining how it will change their neighborhood. More specifically, we request that postcard surveys be sent to all property owners in the single-family districts throughout the city to ask if they support a doubling of the density in their neighborhood to accommodate ADU's.

There is a lot of discussion at City Hall about transparency and public input. There is no better and more cost-effective way to achieve this than by asking the opinion of the people most directly affected. The administration has spent hundreds of thousands of dollars that could have been used to solve the affordable housing problem. Before proceeding, the City of Milwaukee should spend a few thousand dollars on direct mail because it is a drop in the bucket to get real input from real people who have invested their blood, sweat, tears and treasure in our city.

Sincerely,

Allen Witt, P.E.

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