



Department of City Development  
City Plan Commission  
Redevelopment Authority of the City of Milwaukee  
Neighborhood Improvement Development Corporation

Lafayette L. Crump  
Commissioner

Vanessa L. Koster  
Deputy Commissioner

Ald. Bauman  
4<sup>th</sup> Ald. District

**CITY PLAN COMMISSION**  
**COMPREHENSIVE PLAN MINOR AMENDMENT – STAFF REPORT**

**File No.** [240199](#) (Ordinance amending the land use recommendations in the Menomonee Valley Area Comprehensive Plan Update, part of Milwaukee’s Overall Comprehensive Plan, for a portion of the St. Paul Corridor in the 4<sup>th</sup> Aldermanic District)

**Location:** Menomonee Valley Plan Area:

A portion of the West St. Paul Avenue Corridor bounded by North 16<sup>th</sup> Street to the west, I-94 to the north, the Canadian Pacific Kansas City railroad tracks to the south, and North 6<sup>th</sup> Street on the east

**Comprehensive**  
**Plan Amendment:**

At the request of the local Common Council representative (Ald. Bauman; 4<sup>th</sup> District), a proposal to amend the Menomonee Valley Area Plan (“MVP 2.0”) as a part of the City’s Comprehensive Plan, has been introduced for consideration by the City Plan Commission and Common Council.

Currently, the land uses recommended by MVP 2.0 for the West St. Paul Avenue Corridor are for job-creating industrial, office, and commercial uses. The MVP 2.0 recommends continuing to prohibit residential uses that would conflict with the current industrial operations on St. Paul Avenue and in the Menomonee Valley as a whole.

The proposed Plan Amendment would modify the future land use recommendations contained within MVP 2.0 for the portion of the West St. Paul Avenue Corridor bounded by North 16<sup>th</sup> Street to the west, I-94 to the north, the Canadian Pacific Kansas City railroad tracks to the south, and North 6<sup>th</sup> Street on the east to indicate that if there are existing former industrial buildings that are no longer feasible for industrial, office or commercial uses, the land uses for those buildings should be permitted to transition to residential uses, if such a transition is required to preserve the building.

**Background & Additional**  
**Detail on the Proposed**  
**Plan Amendment:**

On June 2, 2015, the Common Council of the City of Milwaukee (“Common

Council”) approved File No. [150029](#) that adopted the Menomonee Valley Area Plan Update (“MVP 2.0”) as an element of the Comprehensive Plan of the City of Milwaukee. The creation of the MVP 2.0 involved extensive public outreach, input and cooperation with the public, businesses, and neighborhood stakeholders and followed the public engagement process created for the development of the City's fourteen area plans.

The MVP 2.0 establishes a vision for the Valley as “a thriving, modern industrial district located in the heart of Milwaukee. With a combination of legacy and new generation manufacturers, the Valley is a model urban manufacturing center providing accessible employment opportunities to surrounding neighborhood residents. With its mix of urban industrial design, prominent location, and labor force accessibility, the Menomonee Valley is a completely built out, job dense industrial hub for the southeast Wisconsin region” (MVP 2.0, page 35).

To protect these industrial uses and jobs, the MVP 2.0 recommends against allowing residential uses within the Plan area because of the potential conflicts with current industrial operations.

The MVP 2.0 presents the following framework for locating residential uses outside of the industrial hub: “the Valley retains its historic and current manufacturing dominated uses attracted by the absence of residential uses that would otherwise clash with the day to day industrial operations of these businesses. Residential uses are welcome in and appropriate in many areas adjacent to the Valley planning area” (MVP 2.0, page 45).

The MVP 2.0 details opportunities and recommendations for each district and corridor in the Menomonee Valley, including the following for the St. Paul Avenue corridor, “[r]ezone....to accommodate light industrial uses not otherwise permitted in the current IH classification” and “[r]esidential uses are not recommended in the St. Paul corridor” (MVP 2.0, page 59).

The “St. Paul Avenue Showroom Corridor”, now known as Milwaukee’s Design District, was a catalytic project within the MVP 2.0. Recognizing the need for businesses to showcase their products and the need to repurpose underutilized buildings, the Plan recommended creating a new industrial zoning district, tailored to St. Paul, to permit more commercial, office, and accessory retail uses. As a result, DCD developed the Industrial-Commercial District and rezoned St. Paul Avenue from Industrial-Heavy to Industrial Commercial in 2016. The rezoning has been successful, as witnessed by business retention and new businesses moving into the corridor.

In addition to the MVP 2.0, the Industrial Land Analysis (“ILA”), adopted in 2021 as part of the City’s Overall Comprehensive Plan, contains recommendations that are designed to preserve and grow Milwaukee’s industrial sector and provide a roadmap for future decision-making related to industrial land. The ILA recommended using zoning tools to protect and expand industrial uses, especially within the City’s seven Industrial BIDs, including the Menomonee Valley. The ILA

highlighted the importance of these BIDs as employment centers and highlighted the need to preserve them in order to provide job opportunities for Milwaukee residents.

As a part of the Comprehensive Plan, the ILA has been adopted by the Common Council as a guide in making future decisions regarding land use. The ILA was developed with extensive outreach and involvement of the seven industrial business improvement districts in the city, and a diverse mix of residents, business owners, and community stakeholders. The ILA affirms the MVP 2.0's recommendations to encourage light industrial, office, and commercial along St. Paul Avenue as it continues to develop into Milwaukee's Design District.

### **324 N. 15<sup>th</sup> Street**

#### **Pending**

#### **Rezoning Proposal:**

Distinct from this proposed Comprehensive Plan Amendment file, a proposal to rezone the property at 324 N. 15<sup>th</sup> Street and 1357-1439 W. St. Paul Avenue to facilitate a mixed-use redevelopment including housing on the upper floors is currently pending review by the Common Council ([FN 231461](#)). This rezoning proposal was heard by the City Plan Commission on March 25, 2024. Staff found the proposal to be inconsistent with the Comprehensive Plan and recommended that the request be denied. After reviewing the proposal and taking public testimony, CPC recommended adoption of the zoning change for 324 N. 15<sup>th</sup> Street, but denial of the zoning change for 1357-1439 W. St. Paul Avenue. This proposed rezoning has not yet been heard by the Common Council's Zoning, Neighborhoods, and Development Committee or referred to the full Common Council for final action.

City ordinances and State statutes require that zoning changes are consistent with the Comprehensive Plan. If the proposed MVP 2.0 Comprehensive Plan Amendment is approved, it could align the Comprehensive Plan with the proposed rezoning.

In addition to the 324 N 15<sup>th</sup> Street proposal being in conflict with current MVP 2.0 recommendations, the ILA included a rezoning evaluation tool to determine when rezoning away from manufacturing was appropriate. DCD used this tool to evaluate the rezoning request for 324 N. 15<sup>th</sup> Street and the evaluation tool supported retaining the existing industrial zoning given the site's location embedded within an active and industrial district.

### **Comprehensive Plan Amendment**

#### **Procedure:**

On December 13, 2016, the Common Council adopted File No. [161076](#), which approved an amended Update and Amendment Procedure for Comprehensive Planning governing the process for making amendments to the Comprehensive Plan. That procedure sets forth a process whereby a Minor Text or Map Amendment. A Minor Amendment means a modification or update to an existing

Area Plan that impacts a very limited geographic area or areas (generally smaller than a “district” or “corridor” as defined by the Plan). The procedure for making a Minor Amendment to the Comprehensive Plan, including a properly noticed public hearing, has been followed.

If approved, the amended Menomonee Valley 2.0 Area Plan shall include as an appendix a text reference that states the following:

“The recommendations related to the St. Paul Corridor within the MVP 2.0 have been modified by the adoption of Common Council File No. 240199. Notwithstanding other land use recommendations contained elsewhere within the plan, for properties along West St. Paul Avenue bounded by North 16<sup>th</sup> Street to the west, I-94 to the north, the Canadian Pacific Kansas City railroad tracks to the south, and North 6<sup>th</sup> Street on the east, if there are existing former industrial buildings that are no longer feasible for industrial, office or other job-creating uses, the land uses for those buildings should be permitted to transition to residential uses if such a transition is required to preserve the structures.”

**Previous City Plan**

**Commission Action:**

5/04/2015 – City Plan Commission recommended for approval the resolution approving the Menomonee Valley 2.0 Side Comprehensive Plan as an element of Milwaukee’s Overall Comprehensive Plan, in the 4<sup>th</sup>, 8<sup>th</sup>, and 12<sup>th</sup> and Aldermanic Districts. (FN [150029](#))

8/23/2021 – City Plan Commission recommended approval of the City of Milwaukee Industrial Land Analysis and amending the Citywide Policy Plan as part of Milwaukee’s Overall Comprehensive Plan. (FN [210587](#))

5/25/2024 – A proposed rezoning from IC to IM for 324 N. 15<sup>th</sup> Street and 1357-143 W. St. Paul Avenue to allow residential was recommended for approval. (FN [231461](#))

**Previous Common**

**Council Action:**

6/02/2015 – Common Council approved the resolution approving the Menomonee Valley 2.0 Side Comprehensive Plan as an element of Milwaukee’s Overall Comprehensive Plan, in the 4<sup>th</sup>, 8<sup>th</sup>, and 12<sup>th</sup> and Aldermanic Districts. (FN [150029](#))

9/21/2021 – Common Council approved the City of Milwaukee Industrial Land Analysis and amending the Citywide Policy Plan as part of Milwaukee’s Overall Comprehensive Plan. (FN [210587](#))

**Recommendation:**

Staff recommends that City Plan Commission recommend denial of the proposed Minor Amendment to the Menomonee Valley Area Plan (“MVP 2.0”).

Significant planning and engagement have established the vision, goals, and land use recommendations for implementation in the Menomonee Valley. The Menomonee Valley is a model urban manufacturing hub. Within the metropolitan area, it offers unparalleled access to workforce, transportation networks, and downtown. The

recommendations for the St. Paul Avenue corridor in the MVP 2.0 remain appropriate and are essential for preserving this unique hub of family-supporting manufacturing jobs in Milwaukee.

The Industrial-Commercial (IC) District has been successful in allowing the conversion of former industrial sites into new office and commercial uses, as evidenced by CK Architects, Plum Media, and others. As analyzed in the ILA, the vacancy rate throughout the Menomonee Valley, including the St. Paul Avenue corridor, is low, with only a small number of challenging sites remaining vacant.

Extensive public engagement with numerous district-wide public meetings and focus groups during the initial MVP 2.0 planning process, more recent engagement in other parts of the Valley during the preparation of the Pierce and Bruce Sub-District Plan, as well as letters that have been submitted to CPC related to this pending Plan Amendment, indicate that allowing residential uses to locate within this active industrial area will pose conflicts and threaten the ongoing operations of existing businesses, and hinder the attraction of new manufacturing businesses in the Valley.

The Menomonee Valley Business Improvement District, who is the membership organization that represents approximately 150 businesses within the area, has submitted a letter of opposition to this Plan Amendment, noting conflicts that allowing residential uses will pose to existing businesses in the Valley. Conflicts that may arise from locating residents at this location along St. Paul Avenue close to industrial uses include heavy truck traffic, unpleasant odors, noise, environmental contamination, and other public health, safety, and welfare risks.

Not only would permitting residential within the St. Paul Avenue corridor be in conflict with long-held job creation goals, the segment of St. Paul Avenue that is the subject of this proposed Plan Amendment is physically disconnected from the larger street-grid, not served by transit, lacks access to park space or other neighborhood amenities, and is embedded within an area that local plans have identified for industrial land preservation.

Based on the above analysis, staff recommends that the City Plan Commission recommend denial of the proposed Minor Plan Amendment to the Menomonee Valley 2.0 Area Plan. The existing MVP 2.0 Plan recommendations are aligned with the goal of protecting valuable, family-supporting jobs in one of the city's most successful industrial districts, while protecting the health, safety, and welfare of the public.