

May 30, 2025

2628 N. Lake Dr.
Milwaukee, WI 53211

Re: City of Milwaukee Draft Housing Element Plan, File #240402

Dear City Plan Commissioners:

We are writing to oppose the new proposed policies in the current draft Housing Element plan allowing external and internal Accessory Dwelling Units (ADUs) by-right across all of Milwaukee.

We support the goals of increasing Milwaukee's population and housing opportunities for people of all incomes. Unfortunately, the ADU portions of Housing Element do the exact opposite. They will not measurably increase Milwaukee's population or give new housing options. Instead, by eliminating single-family neighborhoods, they will reduce housing options, decrease the number of owner-occupied homes and attract absentee landlords – making neighborhoods less stable, causing current tax-paying residents to leave Milwaukee and reducing the value of real estate.

External ADUs will drastically change neighborhoods but will be automatically approved without neighborhood or significant city input. Allowing by-right new buildings and additions in every Milwaukee residential neighborhood will destroy the fabric of single-family and historically preserved neighborhoods across Milwaukee that some of us choose to live in.

Internal ADU is another term for duplex, no matter what semantics are used in the plan. (Merriam-Webster defines "duplex" as "a 2-family house," and an internal ADU will involve at least two separate living units.) Those of us who chose to live in single-family neighborhoods will no longer have the option to live in such neighborhoods in Milwaukee – every neighborhood will allow multi-family housing by-right. The plan allows adding fire escapes on the sides and backs of current single-family homes to meet code for duplexes. Fire escapes go against design standards in historically designated neighborhoods and would completely change the nature of single-family neighborhoods.

We have heard that there will be requirements that only owner-occupants will be permitted to add an accessory dwelling unit. A requirement of that nature may be illegal and will certainly be challenged in court, and it will be impossible for the city to remove ADUs should it be willing to once an owner sells to a buyer, including to absentee landlords and investors. We find that such a rule is impractical and would do nothing to protect neighborhoods from the problems with ADUs.

At various times, the two of us have chosen to live in apartments, duplexes and single-family homes in the Milwaukee area. We appreciated having those choices. We have now chosen for more than 25 years to live in a single-family neighborhood in the city, paying significant property taxes for Milwaukee city services. Ours is the type of neighborhood that Housing Element would eliminate in Milwaukee. Virtually no one in our neighborhood has been asking for this and is supporting such a drastic change. If this plan passes, Milwaukee will be the only community in southeast Wisconsin without the option of living in a single-family neighborhood.

As a former Milwaukee commissioner of city development and former Milwaukee commissioner of assessments, Julie believes the ADU provisions – especially allowing conversion of single-family homes into multi-family / duplexes by-right – would destroy neighborhoods, increase absentee homeownership, cause people with means to leave the city and reduce home values. A city like Milwaukee needs people of all incomes to be a diverse community and also to pay for city services and support city businesses.

Allowing external and internal ADUs by-right goes against the overall stated goal of increasing Milwaukee's housing diversity and its population. We ask that the city eliminate the ADU portions of this plan. There are currently ordinances and processes that allow ADUs to be created but take into account public input, design standards, city approvals and historic preservation. Why not simply use current ordinances, which give current residents a say in what happens in their neighborhoods? Eliminating the current safeguards will harm, not help, Milwaukee neighborhoods.

Instead of spending time to allow external and internal ADUs by-right, the city should be focused on redoubling its efforts to develop vacant lots and abandoned buildings into housing. Most importantly, city government should be working as hard as possible on improving the Milwaukee Public Schools and reducing crime – the two factors that more than anything discourage people from choosing Milwaukee. We strongly encourage the city to bring all its energy and resources to these activities so we can attract residents and increase housing opportunities in Milwaukee.

Jeff Bentoff and Julie Penman