



June 10, 2024

City Plan Commission
809 Broadway
Milwaukee, WI 53202

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

RE: Proposed Rezoning of Properties on W St. Paul Avenue
File Nos. 231461 and 240199

City Plan Commissioners and Zoning and Neighborhood Development Committee Members,

The Menomonee Valley Business Improvement District (BID), which represents the nearly 150 businesses and thousands of employees within the Menomonee River Valley, is opposed to the referenced items before you to rezone properties along W St. Paul Avenue to allow for redevelopment as multi-family residential. The proposals would cause far more significant issues than they claim to address for the district. We are left wondering how such a significant proposal to amend the Valley 2.0 Plan is allowed to even be considered without significant public and stakeholder comment and involvement, much like that which was required to develop the plan and its vision and recommendations.

The BID has co-funded several studies in recent years including the Valley 2.0 Plan, Industrial Land Analysis, the Bruce-Pierce Plan, in partnership with the City of Milwaukee. These efforts engaged hundreds of stakeholders - business and property owners, employees in the Valley, neighborhood residents, workforce development organizations, transportation planners, city policy makers, and more - to develop a robust plan for the future of the Valley. **We heard clearly and consistently from these stakeholders that the collective goal for the Valley is NOT permitting residential development** but keep the Valley as one of the few places in the city for manufacturing and commercial uses to continue and grow close to residents looking for work. We also spent significant time engaging with the same stakeholders to ensure the community's voice was heard, that the Valley plan aligns with those of the surrounding neighborhoods and the vision for the City as a whole. It would be an affront to the work of the BID and the voices of all our stakeholders to have a few voices overturn decades of collaborative work towards a shared vision.

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VICE-CHAIR Tracey Heber, Stamm Technologies
SECRETARY Dan Sterk, Regal-Rexnord
TREASURER Jeff Morgan, Allied Insulation Supply

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Claudia Paetsch, Marquette University
Larry Stern, Standard Electric Supply Co

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Several of the businesses within the BID operate active manufacturing facilities on St. Paul Avenue and have shared with us that permitting residential development here, which has been a specifically prohibited use in every City-adopted plan for this district from 1998 through 2024, threatens their long-term viability. This is exactly what happened on Pierce Street eight years ago, and why since then, that area's businesses asked us to expand our boundaries to include them, to ensure this would not happen again. It is why we completed a plan with the City for that area just this year to help mitigate the issues that arise from inherent conflicts of use. **The same mistakes should not be made here, threatening the viability of businesses that support Milwaukee jobs and the economy, as well as create public safety concerns for both employees and residents.**

No one gains from this, other than the owner of the subject properties and the developer. Employers will question continued investment here, and other businesses in the Valley will see this as a red flag wondering about the City's commitment to their future. Surrounding neighborhoods will question why rezoning an area for residential, where it has never existed in the history of this city, would be to be allowed, rather than encouraging developers to invest in neighborhoods that are actively trying to recruit multi-family developments close to existing transit, parks, and other amenities. This is problematic from an equity lens. The city certainly needs more housing to close the generational racial wealth gap, but building market rate apartments in an industrial district that employs local residents does not help the problem.

The subject properties are a problem, and the City can take a more active role in addressing it, requiring the owner to either maintain the building for a permitted use, or remove the building. **Permitting residential development on this property is not a solution and would be a whole new set of problems.**

We hope that the plan commission and ZND committee will take a comprehensive view of this issue and look at the impacts on land use, safety, business retention, workforce, as well as the potential precedent of allowing a few voices to overturn those of hundreds involved in creating the adopted vision in the Valley 2.0 Plan. On behalf of the BID, we strongly encourage the plan commission and ZND committee to reject these proposals.

Respectfully Submitted,



Joyce Koker, Chair
Business Improvement District #26

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