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March 12, 2024

City Plan Commission
809 N. Broadway
Milwaukee, WI 53202

Dear Honorable Members of the City Plan Commission,

On behalf of Menomonee Valley Partners, I am writing to share our opposition to the rezoning of 324 N. 15th St. to permit residential units in the Menomonee Valley. This would be **in direct conflict with the City's adopted recommendations in the Valley Plan (1998), the Valley 2.0 Plan (2015), the City-wide Industrial Land Analysis (2021)**, and most recently, the **Bruce & Pierce Sub-district Study (2024)**, which was undertaken as a direct result of conflicting residential and school uses adjacent to IH zoned parcels (please see addendum for specific citations).

In fact, due to the distinct issues that surfaced from introducing residential uses in the Menomonee River Valley, the City amended its zoning code to state, "**residential uses not be permitted within 150 feet of a parcel located in IH zoning that contains heavy or intense manufacturing uses.**" This clause helps to protect both the companies that make significant economic investments and provide family supporting jobs, while also ensuring the public health and welfare of our community's residents. This request for residential rezoning violates that clause. The subject property is located just **70 feet away from a heavy chemical manufacturer** which has been in operation for more than a half century.

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 would dissolve the intentional precedent sent from decades of planning efforts. 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.**

There is no infrastructure in the Valley to support residents; no bus line, no parks, schools, groceries, or other amenities for residents. One residential building is not a neighborhood, but creates pressure for additional neighborhood amenities that also go against the long-standing zoning and policy recommendations. In 2016, following recommendations of the Valley 2.0 Land Use Plan, the City of Milwaukee created a new zoning category, Industrial Commercial, and first used on this street, to allow the mix of industrial and commercial uses desired in this area, while continuing to prohibit the uses in Industrial Mixed, particularly residential, that were not supported by stakeholders. MVP opposes changing the zoning on behalf of those **long-standing businesses who would see residential in the Valley as the end to their stability in continued investment here.**

In addition to businesses within the Valley, the seven business districts that touch the Valley participated in a focus group as part of the Valley 2.0 plan and unanimously agreed that the Valley best serves their neighborhoods as a job center, connecting their residents to employment opportunities. They also stated that "**residential development is not the highest and best use of sites in the Valley and does not effectively leverage the strength of surrounding neighborhoods.**" In confirming that those opinions still hold today, Near West Side Partners'

Executive Director, Lindsey St. Arnold-Bell, summarized their position by saying, **“The Valley, a district where housing has never existed before, is surrounded by adjacent neighborhoods that are a perfect fit for residential opportunities for employees in the Valley. We have the existing infrastructure to support both workforce housing and market-rate housing and are open to investment that will enhance both our neighborhoods and the Valley.”** MVP’s position has always been to collaborate with our surrounding neighborhoods on development that complements their efforts, supports what is working here, and uplifts the City’s sustainable development.

While Mr. Breuning has been candid and transparent in his efforts, has invested considerable time and expense in this property, and despite MVP’s excitement to have Mr. Breuning’s redevelopment expertise at work in the Valley, we cannot support the rezoning request to IM to allow for residential development.

At the end of the day, **this decision comes down to preserving one long-neglected, vacant building or upholding the City’s policy decisions that support long-standing businesses and public health and safety.** It is MVP’s position that the latter is paramount – the big picture of the district is more important than a singular building. We are not certain that all possibilities for non-residential redevelopment have been exhausted, but if and when they are, we would rather see a new building on this site that balances the needs of the district as a whole, than disrupting and overturning evidence-based policies that intentionally protect residents and business owners.

We stand firm in our opposition to this rezoning request and we encourage finding 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 "Corey Felt". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Executive Director
Menomonee Valley Partners

Valley Plan excerpts opposing residential rezoning:

“Manufacturing business owners are very concerned about the incursion of residential and school uses adjacent to operating businesses. They feel that the presence of children in particular is a bad mix with their more intense uses, such as metal plating and foundries. They believe an increase in multi-family residences will bring traffic and parking conflicts to an area in which truck access is already an issue.” – Market Study (pg. 6)

“Some property owners desire a loosening of zoning regulations to allow other uses, particularly residential, in these underutilized structures. Existing manufacturing and service industries would like their interests and presence protected, and fear that adding residential or even office uses would cause conflicts by impacting parking demand and their shipping and receiving operations, which are already compromised by narrow roadway widths and lack of north-south connectivity.” – Market Study (pg. 28)

“The Valley retains its historical 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 welcomed and appropriate in many areas *adjacent* to the Valley planning area.” (pg. 45)

“There is pressure to repurpose underutilized and obsolete industrial building stock into multi-family residential units, which has raised the potential for land use conflicts with the existing industrial and commercial employers, who currently enjoy a residence-free area in which to conduct manufacturing operations that can occur at any hour of the day or night.” (pg. 67)

“Residential uses are not recommended in the St. Paul corridor as defined in this plan document.” (pg. 59)

Industrial Land Analysis excerpts:

“Residential uses can crowd out industrial activity as these sectors pay more in rent than industrial businesses.” (pg. 13)

“Ensure that residential and commercial areas within the City’s Industrial BIDs, adjacent to industrial businesses or along industrial corridors are appropriately buffered from industrial activity on site” (pg. 29)

Sources:

City of Milwaukee (2014) ‘Menomonee Valley 2.0 Market Study’. Available at:
https://city.milwaukee.gov/ImageLibrary/Groups/cityDCD/planning/plans/Menomonee-Valley/Valley2.0MarketStudy_FullDraft_Final_4Nov2014.pdf

City of Milwaukee Department of City Development (2015) ‘Menomonee Valley 2.0: A Plan for the Area’. Available at:
https://static1.squarespace.com/static/5b1738a7f8370aa49cd05cf8/t/5b746ab62b6a2889ee8ac8ce/1534356178381/Menomonee+Valley+Plan+2.0_Final.compressed.pdf

City of Milwaukee Department of City Development (1998) ‘Market Study, Engineering, and Land Use Plan For the Menomonee Valley: Final Report’. Available at:
<https://static1.squarespace.com/static/5b1738a7f8370aa49cd05cf8/t/5b74646cb8a045311c66a3a9/1534354818129/MV+Land+Use+Plan+1998.pdf>

City of Milwaukee (2021) 'Industrial Land Analysis: Building a shared understanding of Milwaukee's current industrial sector and provide a roadmap for future decision-making'. Available at:
https://city.milwaukee.gov/ImageLibrary/Groups/cityDCD/planning/plans/Industrial/MKE_IndustrialLandAnalysis_FullReport_withResolution.pdf