

STATEMENT BY BARBARA COOLEY AT JULY 29, 2024 PLAN COMMISSION MEETING

I have a master's degree in urban planning from UWM and am a former president of Eastside Milwaukee Community Council (EMCC). I have owned and lived at my duplex on N. Oakland Avenue for 35 years, since 1989.

I am speaking in partial opposition to the proposed zoning plan. I am certainly not averse to efforts to reverse Milwaukee's decrease in population. But I don't believe this plan is a good fit for all parts of the city and not for the upper East side. That's the area between the Milwaukee River and Lake Michigan, and North Avenue and Edgewood Avenue. No blanket plan such as this can meet the needs of an entire city as complex as Milwaukee. I would propose that this area, and any other area that already meets the city's density goals, be omitted from the plan as having already achieved what the plan wishes to achieve for the whole city. The issues this area does have are not addressed by this plan.

I should point out that I'm not opposed to ADUs as long as they're well-controlled by building codes and there is room for them. DCD produced a report on the feasibility of ADUs in 2020 that could be a reference for their use and control.

What I am opposed to is residential up zoning, removing the housing guardrails so that developers/investors do not have to go through a public hearing process in order to build larger units in the neighborhood. Good zoning protects the people's right to be heard about matters that concern their neighborhoods.

I'm told nothing will change in the upper East side anyway as a result of this up zoning. If it will truly make no difference, why change our zoning? The only potential benefit would be to developers, not the residents. Zoning is not some punitive inconvenience put in place for antiquated reasons. It has always had a real purpose, that of protecting neighborhoods and the people who live there, and giving them confidence that they will have a say whenever a variance is requested. I'm hearing a lot about a lack of community trust. Loosening the zoning code will not improve trust.

While there certainly can be benefits to higher density in urban areas, especially for mass transit and the tax base, there are also downsides to high density – crowding can result in a withdrawal from neighborhood involvement in order to have privacy. Renters tend not to become invested and involved in the neighborhood in the same way that owner occupants do.

This area has already reached mass transit goals. It supports four of MCTS's highest frequency routes: the Green, Gold, Red and Blue lines, all of which serve UWM. Non-car transportation such as bicycles, scooters, motorcycles and BublR bikes also get frequent use.

The plan's citywide goal is higher density and more rental housing, but the East side has already met that goal as well. If anything, we already have too much rental property. This area's needs are different. We need more owner occupants. People may think of the upper East side in

particular as a lot of mansions along the lakefront and big single family houses east of Downer Avenue and along Newberry Blvd, but those are not representative of most of the housing stock, which tends to be duplexes and apartments/condos. And more duplexes have absentee landlords now than in decades past, for reasons including UWM's and MPD's disengagement through about 2010, and subsequent owner occupant flight due to student disruption and vandalism. The duplexes used to be heavily owner-occupied, with one flat rented out. Now owner-occupants have sold to absentee landlords, many from outside the city or even the state. And I can recount at least one instance in which a bank (which advertises itself as concerned for the community) refused to sell 17 duplexes to individual homeowners because they could sell them as a block to a Chicago investor instead.

Rental rates are certainly too high now and that is a problem, but there is no indication that up zoning will lower them. They are very high all over the country, not just on the upper East side and not just in Milwaukee. The problem is so pervasive and difficult that there is now talk of federal intervention to cap rental rates. But in fact, density is already high in the area. In 2022 according to ArcGIS there were 8,356 total housing units in those six census tracts, which cover only about 2 square miles, equaling about 6.5 units per acre, and the vacancy rate was at 10%, which I'm told is DCD's goal vacancy rate to bring rents down.

I'd also like to know how this initiative is going to be tracked for evaluation of program effectiveness.

It's been implied that I'm just a boomer who already has mine and wants to "pull the ladder up" so the next generations can't get ahead. My own home is one of those owner-occupied duplexes, not some mansion. And I currently have family living in my lower unit so am not collecting those high rents. I happen to care deeply about the health of this neighborhood. My focus with EMCC was a concerted effort to educate younger people in the economic advantages of being a duplex owner-occupant. We held seminars that included real estate professionals and loan officers from banks. Unfortunately, very little was available on the market, and what did come available was being snapped up by absentee (even out of state) investors. The same situation exists today. We even worked to get improvements at our local public schools to attract families and did achieve advanced placement availability for middle schoolers at Hartford University School.

If anything, what the upper East side needs from the City is some sort of assistance or incentive for younger people, especially families, to purchase these duplexes as owner occupants when they come available, ahead of absentee investors. I'd be happy to work with DCD or anyone who is interested in a homeowner incentive program that could work in these situations.

Although I do appreciate the tremendous amount of work that went into developing this proposed plan, with the exception of allowing ADUs, this zoning proposal is not helpful for the upper East side and could result in real damage to our community.

ADDENDUM

A group of Water Tower Historic Neighborhood Association homeowners requested that all of their neighborhood including the portion south of North Avenue be added to this statement. (The portion of that neighborhood north of North Avenue is already included in the Upper East Side, addressed above.) Many, but not all, homes in the Water Tower neighborhood are designated for historic preservation.

The points made in my initial statement also apply to the area immediately south of North Avenue, including the rental vacancy rate of 10%, which matches the vacancy rate we have been told is the goal rate in the proposed plan for the city as a whole. And given that the vacancy rate is already at the goal, a considerable number of additional units would be required to lower rental rates in the area, if in fact a higher vacancy rate would accomplish that.

There is virtually no developable land remaining in the area under discussion. Only one parcel appears as developable on Milwaukee's planning maps. This means that the only options for additional units are to modify existing residential properties to add units or to tear them down and build larger ones. Both options could damage the nature of these neighborhoods.

The resulting additional units would be rental units. Rents would still need to be high enough to cover the costs of creating them, including in some cases the cost of purchasing the initial property to be torn down and replaced or modified. None of this would result in lower rental costs, a stated goal of the proposed zoning.

The Water Tower residents were especially concerned about the provision which would allow ADUs to be added to existing houses. While these might begin as units for family members, they would invariably become rental units at some future date. If they are constructed by converting upper floors into additional units, unsightly and historically inappropriate fire escapes would be necessitated. They could be created by converting existing garages or adding a cottage in the yard where space allows. In either case, more cars would be vying for already-impacted street parking. (Up to 3 unrelated persons can reside in one unit, resulting to as many as nine cars for a triplex.)

There are 4,446 residential units in just the three census tracts immediately south of North Avenue, yielding an already higher density rate than that of the 8,356 units in the six census tracts in the Upper East Side.

There is no apparent reason to be taking such risk with our neighborhoods when the area already meets the proposed plan's density and vacancy goals. The winners would be developers, often from outside the city or even the state, who are already making it difficult for individuals to become homeowners here by aggressively buying properties for rentals. The only increase in housing stock would be more rental properties, and as has been noted, no one dreams of being a renter. This plan does nothing to enable responsible, community-building home ownership.

Thorough analysis needs to be performed before a plan is adopted for the entire City. Zoning is not something that can be applied in such a blanket fashion, nor is it intended to be. It is further not intended to be little more than a marketing tool to draw developers regardless of the needs of the City's residents.