10/10/2025

To: Wauwatosa Plan Commission, City Council Members

From: Wauwatosa Joint Housing Coalition

Re: Comments on Draft Zoning Recommendations

After reviewing the draft zoning recommendations, the Joint Housing Coalition is offering comments on what we like in the draft and the clarifications and changes we would like to see before final approval to support our goal of increased affordable, accessible and sustainable housing as envisioned in the Tosa Tomorrow 2045 Comprehensive Plan.

The draft is a complex document to understand and we hope that before or at the public hearing the proposed changes will be presented in a way that residents can understand the modifications. We hope there will be an emphasis on why "gentle densification" and "missing middle housing" needs to be a goal for the city to increase the tax base, and provide a range of housing options at various price points that will improve affordability and accessibility, and attract families to support our schools.

Residential Area - GR, SR, NR

While the designations of the current Single-Family zoning areas have been renamed, we are concerned about the minimal changes allowed in these areas.

Over sixty percent of all city properties will now be zoned for <u>detached single-family or two-family homes</u> only. If two-family homes are allowed, why are 2-family semi-detached homes, not permitted?

However, the proposed zoning only allows an existing home to be converted into a two-family home, and an undeveloped property to have a duplex constructed on it. And these changes come with a significant caveat: "a two-family home may be incorporated when compatible with surrounding development patterns". Who gets to make that decision? Will neighborhood objections overrule conversion? One of the key goals of the zoning changes was to allow gentle density increases by right.

The coalition requests that this caveat be removed or revised to define compatibility with examples, or have design standards that make "compatibility" less subjective.

We applaud reducing the minimum lot sizes, it allows for an owner to subdivide a large parcel and build two family homes in all of the residential districts.

Mixed Residential - MR

The R-2 zoning becomes Mixed Residential allowing 3-4 units, and courtyard homes in addition to the currently permitted single and two-family homes. **The coalition supports this zoning change allowing for a greater potential of building smaller homes in neighborhood settings.**

However, the area zoned as MR in the draft are small pockets among large NR designated areas. Currently much of the NR areas on the east side of the city are in neighborhoods that are already a mix of single family and detached and semi-detached two family homes.

The coalition asks that you designate large sections of the NR area on the east side as MR using the boundaries proposed in the Future Land Use map on page 29 of the comprehensive plan.

Low and Medium Density LDM, MDM

We support the increases in housing options and increased density in these areas. We assume that these permitted uses are by right without any qualifications.

Commercial - CO, C1, C2

While C1 and C2 always allowed multi-family dwellings, the modifications now allow single-family, two-family, semi-detached and cottage courts. While it is unlikely that single-family and two-family units will be built in these commercial strips, we hope for housing built over retail or office space. The C2 zoning says that it "allows residential uses in locations consistent with the character of the surrounding area." Can you please clarify if this caveat applies to single-family homes, two-family homes or to residential apartment buildings? Again, who gets to make that decision? Will neighborhood objections overrule?

In the Cottage Court description, why demand that the units be a minimum of 1800 SF when Cottage Courts typically are small scale 1,200 to 1,600 SF buildings?

We applaud the recommendation embedded in the zoning to encourage affordable housing by increasing building heights and reduced parking requirements.

Thank you for your consideration of these clarifications and change requests.

For the Joint Housing Coalition

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