

RE ZC CASE 21-11 Lisner Home Map Amendment

I'm writing to urge you to deny setdown on the Applicant's map amendment request. Applicant should be encouraged to resubmit its development proposal through the Planned Unit Development process.

Applicant is asking you to dramatically upzone a 5.4 acre property that serves as the buffer between the highly-developed commercial strip at Wisconsin/Military/Western and the adjoining residential neighborhood. If you grant this request, you will create an entitlement for over half a million square feet of matter-of-right redevelopment at this site – giving the property more than 5 times as much development capacity as is currently permitted on this site.

(The current FAR is .4; the requested map amendment would allow up to 2.16 FAR).

The ostensible reason for the Applicant's request is that it wants to construct a 90+ unit apartment building that would provide affordable housing for seniors on one corner of its lot. That is a project that could and should be accomplished through the Planned Unit Development process. A PUD would provide community input and create enforceable commitments regarding the building's structure and location, as well as the level and duration of affordability, and any other issues of concern.

By contrast, the map amendment that Applicant has proposed would allow matter-of-right development not only for the project described in this filing, but for any other or additional project(s) up to 511,000 square feet total at the site. Once this map amendment is granted, neither Lisner nor any subsequent property owner or developer will be bound by any representations made to the Commission or to the neighborhood regarding what will be built (or preserved).

Current zoning at the site (R-2 for the residential component) is not inconsistent with the Future Land Use Map (whose definition of moderate residential development explicitly envisions neighborhoods with a mix of housing types including the duplexes that the current R-2 zoning incentivizes). So this is not a matter of updating the zoning to achieve consistency with the FLUM. Applicant's justification for the amendment appears to be that it is necessary to facilitate an affordable housing project that serves the public interest. But that is precisely what the PUD process is there to determine and ensure. A simple map amendment doesn't require ANY affordable housing – it just removes decisions about major redevelopment on the site from public oversight/input/control.

Bottom line – don't grant development authority for 511,000+ SF when the Applicant only claims to need 85,000 SF and don't let representations of what might be built and rhetoric about good intentions substitute for specific and enforceable constraints on the conditions under which zoning relief will be granted.

Submitted by

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