

June 5, 2025

To: Eau Claire City Council

Subject: Follow-Up on Century Code Update and the Role of the Housing Opportunities Commission (HOC)

Dear Council Members,

This letter serves as a follow-up to our correspondence dated April 9, 2025, and is intended to reaffirm, restate, and further implore the Council to take action to ensure affordability is not lost when approving the Century Code Update.

As you know, the Housing Opportunities Commission (HOC) was established by the City Council in 2020 to advise on housing policy and support efforts to expand access to affordable housing. Among the stated purposes of the Commission is to:

- “Recommend and review ordinances and other policies of general application that best ensure the availability of affordable housing in the city of Eau Claire.”
- “Review affordable housing policies and provide recommendations and comments to the Plan Commission and City Council.”

In line with this mandate, **we are writing to express our concerns about the implications for the Century Code Update on housing affordability and accessibility in Eau Claire.**

The Local and National Housing Crisis

Nationally, there is a shortage of over 7 million affordable homes for more than 10.8 million extremely low-income families. In no U.S. state or county can a full-time minimum-wage worker afford a standard two-bedroom apartment.¹ According to *Forward Analytics*, Wisconsin must build at least 140,000 new housing units by 2023 just to meet the current demand. In addition, “If Wisconsin hopes to increase its working-age population by the end of the decade, the number of housing units needed jumps to 227,000.”²

Eau Claire is not immune to these trends. Our community is experiencing a growing housing crisis marked by an increase in:

- Unsheltered homelessness
- Emergency Shelter overcrowding
- Households living on the brink of homelessness

¹ National Low Income Housing Coalition (NLIHC) – www.nlihc.org

² Schulz, Joe. Outdated zoning makes addressing Wisconsin’s housing shortage more difficult. WPR, January 12, 2023. <https://www.wpr.org/economy/outdated-zoning-makes-addressing-wisconsins-housing-shortage-more-difficult>

Important data points to consider:

- **33% of Eau Claire residents are renters** (NLIHC). To afford a two-bedroom apartment in Eau Claire, a household must earn \$41,560 annually or at minimum wage, work 110 hours a week.³
- **As of May 27, 2025**, the Balance of State CoC estimates Eau Claire needs **an additional 282 housing units** and case management support to end homelessness for:
 - 236 households without children,
 - 46 families,
 - 80 have been homeless over a year and have a diagnosed disability,
 - 54 seniors are over the age of 62, and
 - 14 households waiting over 500 days for housing assistance.⁴
- **37% of Eau Claire fall under the ALICE threshold** (Asset Limited, Income Constrained, Employed), struggling to afford basic needs such as housing, child care, food, transportation, health care, and technology. (United Way ALICE Report)⁵

The Role of Zoning and Policy Reform

In *Homelessness is a Housing Problem*, Professor Gregg Colburn notes that regulatory barriers – such as restrictive zoning, excessive lot size minimum, height restrictions, and inflexibly building codes – hinder the construction of affordable housing.⁶ He calls for:

1. Operating investments to fund housing support, maintenance and services, and
2. Capital investments to construct housing.

Colburn emphasizes that when construction is difficult due to regulatory complexity, reform must follow.⁷

We echo this. One of the state goals of the Century Code rewrite was to “Produce more housing supply, diversity of choices, and affordability.” To achieve this, we urge the City Council to integrate the following best practices into the new code:

- Support for missing middle housing through targeted rezoning
- Repurposing underutilized land
- Reducing or eliminating parking minimums

³ Out of Reach: NLIHC – Eau Claire MSA. <https://nlihc.org/oor/state/wi>

⁴ Wisconsin Balance of State CoC Quarterly Meeting, Executive Director Presentation, May 2025.

⁵ The State of ALICE in Wisconsin, United Way - <https://www.unitedforalice.org/introducing-ALICE/wisconsin>

⁶ Colburn, Gregg & Clayton Page Aldern. *Homelessness is a Housing Problem: How Structural factors Explain US Patterns*. Oakland, CA, University of California Press, 2022: 156-7.

⁷ Colburn, Gregg. “Homelessness is a Housing Problem” – Virtual Policy Forum on Homelessness, July 24, 2023 - https://www.vermonttreasurer.gov/sites/treasurer/files/documents/Vermont_072423.pdf

- Revising height restrictions to allow for greater density
- Removing barriers to Accessory Dwelling Units (ADUs)
- Creating pathways for office-to-housing conversions
- Streamlining the permitting process
- Implementing clear, simple and cost effective design standards

Without intentional change, communities were left with “outdated ordinances and codes, some dating back over a century, which increasingly obstruct the capacity of cities to adapt and grow in ways that align with the evolving needs of their communities.”⁸

Unfortunately, the current draft includes elements – such as aesthetic mandates, strict tree preservation requirements, and new parking impact fees – that function as affordability roadblocks. These provisions increase construction costs and reduce flexibility without demonstrable benefit to safety, efficiency, or long-term sustainability.

These kinds of policies, while well-intended, have the unintended consequence of pushing more households out of the housing market. At a time when over one-third of our residents are already struggling to afford basic needs, the City must choose to be part of the solutions – not inadvertently make the problem worse.

Final Thoughts

- Design standards can add significant costs that have to be recovered in the building price or rental rates. Twin homes and multi-family developments represent the most affordable housing types, and this is where the standards (i.e. garages, building materials, landscaping, etc) have the most negative impact. **We ask you to re-look at the design standards to remove restrictions especially on garage standards.**
- The proposed tree preservation standards will add significant fees, especially onto smaller in-fill developments and more wooded land. **We encourage you to look differently at tree preservation to encourage tree cover with incentives rather than arbitrary requirements and fees that significantly increase costs and discourage infill development.** If the current tree preservation structure moves forward in the code, then we ask for the DBH to be increased to reduce some of the overall cost impact.
- Mandates for multi-family development such as requiring balconies or expensive building structures, social gathering spaces, etc. This is an area where the market should

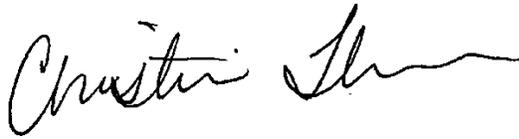
⁸ Hanley, Allison. Rethinking Zoning to Increase Affordable Housing. Journal of Housing & Community Development, December 22, 2023. https://www.nahro.org/journal_article/rethinking-zoning-to-increase-affordable-housing/

be allowed to determine what is built, especially considering that multi-family is the most affordable type of housing that can be provided. Developers will still frequently provide these amenities for market reasons, but to mandate them for all developments is counterproductive to building naturally occurring affordable housing. **We ask you to re-look at mandating requiring balconies or expensive building structures, social gathering spaces, etc.**

The City of Eau Claire has the opportunity and obligation to act boldly and decisively in addressing the housing crisis. Zoning and land use policy are critical tools in that effort. **We urge the City Council to align the Century Code rewrite with the best practices that promote affordability, accessibility, and resilience in our housing market.**

We stand ready to collaborate and provide further recommendations as the process moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Shuman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Housing Opportunities Commission
City of Eau Claire