



June 17, 2025

To: The Eau Claire Zoning Policy Advisory Committee (ZPAC)
From: Susan Wolfgram & Paul Savides, Co-Chairs JONAH Affordable Housing Task Force
Re: Comments Impacting Affordability in the Century Code Update

Our Task Force wants to express appreciation for all of the work that has gone into this Century Code Update, including a very intentional plan to engage the public in multiple ways over time. Our Task Force has been a strong partner in advocating for affordable housing in Eau Claire, including but not limited to: being a Chippewa Valley Regional Housing Task Force partner; Susan was part of the Eau Claire Regional Housing Study Steering Committee, and she was also a part of the Zoning Policy Advisory Committee as a Plan Commissioner.

Zoning is a holistic process of “planning for the seventh generation.” It is an awesome responsibility. The “Seventh Generation Principle” requires us to consider the impact of development on future generations and to ensure that they are sustainable and beneficial for the community as a whole. Although many parts of the Update are interconnected with affordability, including the reduction of exclusionary zoning practices and improving development process certainties, we are focused on this critical purpose:

- **Produce more housing supply, diversity of choices, and affordability which is the lens through which all sections of the code should be measured.**

We are aware of the communications ZPAC has received from the Housing Opportunities Commission (HOC), The Eau Claire Chamber of Commerce, and the Chippewa Valley Home Builders Association (CVHBA). They similarly express important points about the impact on affordability. **After carefully reviewing all comments, we would like to echo and support the recommendations of the HOC, which has taken into consideration the Chamber’s concerns and the CVHBA concerns:**

- A significant number of the proposed new standards have the potential to advance these goals through changes in minimum lot sizes, allowing gentle density increases, incentivizing compact and sustainable development, improving development process certainties, reducing exclusionary zoning practices, and lessening pressure on sprawl.
- It is important for ZPAC to carefully consider the impact on supply and affordability as it reviews proposed content related to building design standards, parking requirements, aesthetics, anti-monotony mandates, tree preservation, park impact fees, and other sections. If not done in a carefully balanced way, they could produce unintended consequences that could inhibit improvements to supply and affordability.

The following are some areas of concern to be reconsidered, given their potential to raise housing costs:

- Aesthetic standards that 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 such standards may have the most negative impact.
- Onerous tree preservation standards. A balanced approach could encourage tree cover with incentives rather than arbitrary requirements and fees that significantly increase costs and discourage infill development.

- Park impact fees and requirements. Parks are a significant asset that Eau Claire already enjoys. We understand the city is currently assessing its portfolio and use of parks. Imposition of these requirements should be postponed until such analysis is completed.
- Mandates for multi-family developments such as a high percentage of balconies, social gathering space, etc. This is an area where the market should 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 affordability.
- Parking mandates that add costs to projects and are contrary to some of the stated goals of the zoning rewrite to reduce auto dependency. Once again, the space devoted to parking should be market-determined, and it can't be assumed that every family and every bedroom represents an auto that must be parked. When applying one of the zoning rewrite's purposes of using current best practices, it should be noted that an increasing number of cities across the country are successfully removing parking minimums.

The Century Code Update is a vital process to help our community goal of housing attainability for all community members. Please keep the “seventh generation” in mind moving forward with a focus on our most vulnerable: the almost 40% of neighbors earning 60% and below of the County Median Income and paying 50% or more of their income on rent, those with high rental barriers, and those neighbors experiencing homelessness.

Without stable shelter, everything else falls apart.

~Matthew Desmond, author of “Evicted”

Sincerely,

Susan Wolfgram & Paul Savides
Co-Chairs of the JONAH Affordable Housing Task Force