



222 W. Washington Avenue, Suite 600 | Madison, WI 53701  
608-286-6300 | [aarp.org/wi](http://aarp.org/wi) | [wistate@aarp.org](mailto:wistate@aarp.org)  
twitter: @aarpwi | facebook.com/AARP Wisconsin

19 September 2023

Lewis Kuhlman, AICP  
Environmental Planner  
City of La Crosse  
400 La Crosse Street  
La Crosse, WI 54601

Lewis,

I've had the opportunity to review the proposed ADU ordinance that you recently shared with the Neighborhood Revitalization Commission. Congratulations on getting it to this stage, I can appreciate how much goes into such an undertaking. I can't help but think back to our meeting earlier this year when I shared the AARP resources relating to Accessory Dwelling Units (ADUs) and where you were in the process then. You've accomplished a lot since then.

AARP views ADUs as one tool in the toolbox to address affordable housing availability in our communities. They also provide options for older residents who wish to live independently, but don't need a large home. And they provide opportunities for caregivers to live close by.

I do believe that you are off to a great start, but wanted to share some recommendations based on our experience of working with similar ordinances across the United States.

- A successful ordinance would offer the ability to construct an ADU most places within the city. I note that your proposal excludes most areas zoned R-1. A quick glance at a zoning map and this appears to be a substantial part of the residential area of La Crosse. We suggest allowing ADUs in all residential areas for the reasons stated above, but also because limiting the construction to this magnitude may make the legislation less effective. An approach may be allowing construction in only single-family zoned areas or where there is robust transit service.
- I also noted an occupancy requirement which stipulates that the property owner has to live in either the main house or the ADU. We have seen this requirement as a limiting factor to ADU adoption. If completely removing the requirement is not an option, we would suggest a test period where ADUs are permitted without an owner occupancy requirement to determine whether problems with tenants justify imposition of an owner occupancy requirement.
- It was also noted that the proposed ordinance only allows for detached ADUs. This could also be a factor that limits adoption as it limits options for homeowners. Their lot may not be suitable for a detached ADU but could support an attached unit. We've found that allowing property owners options is important to getting ADUs constructed.

- And lastly, I'd suggest that you implement a data collection and reporting process into the ordinance. Reporting back to Common Council the number of units applying for permits and the number constructed will allow policy makers to determine the effectiveness of the ordinance.

I know that you want this project to be successful and I believe that it will be with a few suggested tweaks. Please do not hesitate to reach out if I can be of any support, I stand ready to help however you'd find valuable. I may be reached at 608-286-6303 or [dwasniewski@aarp.org](mailto:dwasniewski@aarp.org).

Sincerely,



Darrin Wasniewski  
Associate State Director- Community Outreach

Cc: Jennifer Trost, chair, Neighborhood Revitalization Commission