

2015-2019 Analysis of Impediments to Fair Housing Choice

Waukesha County, Wisconsin
And the HOME Consortium including
Jefferson, Ozaukee, Washington, and Waukesha Counties

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**Prepared for
Waukesha County, Wisconsin**

By



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Executive Summary

Introduction

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin, and was amended in 1988 to include familial status and disability. HUD grantees receiving funds under the Community Development Block Grant (CDBG) program are required to complete a fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI) to ensure that housing and urban development programs are being administered in a way that furthers fair housing for these protected classes.

Waukesha County, Jefferson County, Ozaukee County, and Washington County participate together in a Consortium for the purpose of accessing federal affordable housing funds under HUD's Home Investment Partnerships Act (HOME) program. Because of the collaborative affordable housing planning undertaken by the Consortium, the members sought to jointly conduct this AI to provide a streamlined regional approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries.

Historical Overview

Waukesha County, which is located in southeastern Wisconsin, is home to more than 390,000 people and 37 municipalities. Waukesha is the 3rd most populous county in Wisconsin and has a total of 6 percent of the population of the entire state. The County encompasses 7 cities, 18 villages and 12 towns. Waukesha County is located 15 miles west of the City of Milwaukee, 60 miles east of the City of Madison, and 100 miles northwest of Chicago.

Since 1998, Jefferson, Washington, and Waukesha counties have participated as a HOME Consortium. In 1999, Ozaukee County joined the Consortium. The Consortium allows local governments, which would not otherwise qualify for funding, to join with other contiguous units of local government to directly participate in the HOME Investment Partnerships Program (HOME). Every municipality in Jefferson, Ozaukee, Washington, and Waukesha Counties, with the exception of Sullivan (Jefferson County) and Chenequa and Oconomowoc Lake (Waukesha County), has formally approved participation in the HOME Consortium. The Consortium assists in providing affordable housing options in the region by providing down payment assistance, acquisition/rehabilitation assistance, and low-interest housing rehabilitation loans.

Socioeconomic Overview

Data from the 2000 and 2010 Census, as well as, the 2013 American Community Survey provides demographic information for the HOME Consortium counties. In total, the population in the region has increased from 634,598 residents in 2000 to 698,145 residents in 2010, or an increase of 10.0%. According to the 2013 American Community Survey, the population total consists of Waukesha

County with a population of 393,843 persons, 84,509 residents in Jefferson County, 87,054 residents in Ozaukee County and a population of 132,739 in Washington County.

Data regarding the age of the overall population from 2000, 2010, and 2013 in the HOME Consortium counties, reflects the largest population groups represented persons aged 5 to 19 and 35 to 54. However, these two age cohorts were also the only groups to show a decrease in population between 2000 and 2013. On the other hand, the cohort aged 55 to 64 showed significant increases of more than 63 percent or more in all jurisdictions during this time, while the number of persons aged 20 to 24 and 65 or older both showed increases of more than 15 percent or more in each jurisdiction. Census data indicated low populations from racial and ethnic groups in each of the Consortium counties with all counties, Waukesha (6.1%), Jefferson (3.4%), Ozaukee (5%), and Washington (3.7%) each having below 10% of residents belonging to racial and ethnic minority groups. For each county, the primary racial and ethnic minority group was Hispanic.

Segregation Analysis

Four methodologies (Dissimilarity, Exposure, Isolation, and Entropy indices) for analyzing segregation, the degree to which two or more racial or ethnic groups live geographically separate from one another, were used in this study. The methodologies used in this analysis indicate low levels of segregation among minority and White residents, but a high level of isolation for Whites with very limited levels of exposure to minority populations. While slight improvements have occurred since 2000, diversity throughout the region remains low, with Whites having a low likelihood of interacting with minority residents, and minorities having a low likelihood of interacting with one another.

Residential patterns in the study area are part of a larger regional picture for metro Milwaukee. While segregation is low within the four-county area, the Milwaukee-Waukesha-West Allis MSA has the 2nd highest dissimilarity index for Black and White residents in the nation, and the 13th highest for Hispanic and White residents.¹ Low levels of diversity in Waukesha, Washington, Jefferson, and Ozaukee Counties continue to contribute to persistent segregation region-wide, and any impediments in the four-county area that limit housing choice or inhibit housing options for protected classes must be addressed to improve conditions both locally and regionally.

Public Investment, Infrastructure, and Education

Waukesha County has a regional airport situated in the City of Waukesha. The County airport is used for the transportation of good and services by businesses and also transports the general population in some instances. Characterized as a Transports/Corporate/ Airport, it serves small airplanes, corporate jets, and small passenger and cargo jets. Waukesha Metro Transit provides public transit across the city of Waukesha. The system operates 11 bus routes and contracts with

¹ "Data: Residential Segregation." *US2010: Discover America in a New Century*. American Communities Project: Brown University. <http://www.s4.brown.edu/us2010/SegSorting/Default.aspx>

another local bus route, contracts with four commuter routes to Wisconsin Coach Lines, and partially funds two routes of the Milwaukee Transit System that have extensions into Waukesha County. Neither Jefferson, Ozaukee, nor Washington Counties are served by public transportation systems, but each offers taxi services for the elderly and disabled and/or bus commuter services into Milwaukee. The four county study area is served by several water and sewer systems typically run independently by local cities, villages, or municipalities. While each local water and/or waste management system serves to meet the needs of local residents, future land use and development projects will require collaboration across facilities and services.

Public schools within the four-county study area performed well in terms of retention rates, attendance rates, and having low truancy and school dropout rates. Jefferson and Washington Counties have the lowest rates for educational attainment and students entering into higher education following high school. Both counties also have the highest rates of students entering directly into employment following high school completion. Overall, the four counties have low enrollment of racial and ethnic minority students. However, in several instances graduation rates are lower for these students indicating increased need for supportive services. Several HUD block groups in the City of Waukesha scored low in terms of school proficiency. However, the rest of Waukesha, Washington, and Ozaukee Counties have a high level of school proficiency when compared to the rest of the Milwaukee metro area. According to HUD data, school proficiency varies in Jefferson County, with the northeast (Watertown and Ixonia), the southeast (Whitewater and Palmyra), and parts of Jefferson facing lower opportunity levels compared to the Lake Mills and Sullivan areas.

Access to Areas of Opportunity

HUD's Office of Policy Development and Research uses a methodology to "quantify the degree to which a neighborhood offers features commonly associated with opportunity."² These areas of opportunity are based on five "opportunity dimensions," including poverty, school proficiency, labor market engagement, jobs access, and exposure to health hazards. Higher poverty (and thus, lower neighborhood opportunity) was found in several cities and villages, including parts of Waukesha, Port Washington, West Bend, Hartford, Hartland, Watertown, and Fort Atkinson. Several block groups in the City of Waukesha also scored low in terms of school proficiency. Labor market engagement and jobs access both vary within each county. Census block groups in the Cities of Waukesha, Jefferson, West Bend, and Hartford have some of the lowest labor market engagement scores; high scores are found in block groups in Cedarburg, Mequon, Brookfield, Menomonee Falls, Delafield, and just west of the Waukesha city limits. Jobs access opportunity levels are best in block groups located in cities including Waukesha, Pewaukee, New Berlin, Brookfield, West Bend, and Hartford. Rural areas within the counties tend to have lower access to jobs. Potential exposure to health hazards is highest in the Waukesha/Pewaukee and Menomonee Falls/Germantown/Mequon areas and recedes moving out from these centers. Northern Washington and Ozaukee Counties,

² HUD Office of Policy Development and Research, "FHEA Data Documentation," Draft. 2013. p. 4.

western Waukesha County, and all of Jefferson County face less exposure to potential environmental toxicity than do the more urban areas located closer to the Milwaukee.

Land Use & Zoning

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact their respective jurisdictions. Under Wisconsin's zoning enabling statutes, the responsibility for administering a local zoning ordinance is divided between the local legislative body (i.e., County Board of Supervisors, City or Common Council, Village Board of Trustees, or Town Board), the plan commission, and the board of appeals/adjustment ("BOA"). In Wisconsin, the general zoning authority of counties is limited.

Housing Profile

According to 2008-2012 ACS estimates, Waukesha County contained a total of 160,639 housing units, Washington County has 54,703 units, Ozaukee County has 36,252 units, and Jefferson County has 35,079 units of housing. Homeownership rates were over 70% in each of the counties, ranging from 71.7% in Jefferson County to 78.6% in Ozaukee County. Vacancy rates for owned housing were low (less than 2%) in Waukesha, Jefferson, and Ozaukee Counties. The rental vacancy rate was higher, ranging from 4.0% in Waukesha County to 7.7% in both Jefferson and Ozaukee Counties. Jefferson County has the oldest housing stock, indicating an increased likelihood of needs for repairs, rehabilitation, and making units compliant with ADA disability requirements. In Jefferson County, 40.8% of the housing stock was built in 1959 or earlier. Each of the other counties also had a large percentage of housing stock built before 1960: 28.1% of units in Ozaukee County, 24.5% of units in Washington County, and 24.3% of units in Waukesha County. Each of the four counties has less than 1% of housing stock built in 2010 or later.

Substandard housing and overcrowding remain low for each of the four counties in the study area (below 1%). While substandard living conditions are low for Waukesha County, further analysis of relevant data indicates areas in which residents of racial and ethnic minority groups experience disproportionately greater need in relation to housing problems and severe housing problems, even when income is taken into account. Housing affordability is also an issue for residents across the region as median wages in each of the four counties falls below wages needed to rent a two-bedroom apartment at fair market rate and significant percentages of residents pay above the HUD recommended 30% of income towards housing.

Home Mortgage Disclosure Act (HMDA) Analysis

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home

loan market. This analysis found differences in loan approvals and denials by sex, race, and ethnicity that varied depending on income levels. Low- income male and female applicants had higher approval rates and lower denial rates than male/female co-applicants. As incomes increased, this relationship reversed with male/female co-applicants with moderate- incomes becoming more likely to have loan approvals. A comparison of loan outcomes by applicant race/ethnicity found a 14.5% gap in approval rates between low- income White and low- income minority applicants. Common reasons for loan denials were explored, as available, and included debt-to-income ratio, collateral, and credit history.

Fair Housing Organizations & Activities

The Metropolitan Milwaukee Fair Housing Council (MMFHC) promotes fair housing throughout the State of Wisconsin by combating illegal housing discrimination. MMFHC operates two satellite offices, the Fair Housing Center of Greater Madison (FHCGM) and the Fair Housing Center of Northeast Wisconsin (FHCNW). Other municipalities, such as the City of New Berlin and the Counties of Jefferson, Ozaukee, and Washington assist in promoting fair housing education and outreach by implementing Fair Housing Proclamations and providing informational materials on fair housing.

Housing Discrimination Complaints

Between January 1, 2006 through July 1, 2014, HUD reported a total of 87 complaints filed from within the counties of Waukesha, Washington, Ozaukee, and Jefferson. A total of 262 basis were cited in relation to the 87 complaints filed. Disability was the most commonly cited basis in the complaints, with 40 complaints, followed by race, with 27 complaints. Familial status and national origin were cited 19 and 12 times, respectively. Housing complaints filed with HUD can also be examined by closure status. Of the 87 total complaints, 78 (90%) were found to have a no cause determination, which means that discrimination was not found. The Metropolitan Milwaukee Fair Housing Council (MMFHC) also receives complaints by households regarding alleged violations of the Fair Housing Act. Between 2008 and 2012, there were 277 complaints made to MMFHC. Of the total 277 complaints, there were 86 complaints related to disability status and 55 complaints related to race and/or color. Other notable complaints were familial status (40), sex (29), lawful source of income (18), and age (16).

Impediments and Recommendations

Impediments identified through this research are summarized below with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related impediment. It should be noted that these barriers are largely systemic and will require effort from both private sector and public sector actors to correct.

Impediment #1: Zoning Regulations and Housing Mix Ratios that Reduce Opportunities for Affordable Housing Development

A Regional Housing Plan for Southeastern Wisconsin: 2035 prepared by the Southeastern Wisconsin Regional Planning Commission identified several zoning and regulatory impediments to the development of affordable housing. These included excessive minimum floor area requirements, excessive minimum lot sizes requirements, and other limits on density. Several communities do not permit multifamily housing by right – some require a conditional use permit and others do not allow it at all. Housing mix ratios also explicitly restrict the share of multifamily housing within a community. While density is limited in some cases by a lack of infrastructure (i.e., sewers), several villages in the study area have sewer service yet still require at least 70% of residential units to be single-family. Research conducted for the *Regional Housing Plan* shows that a lack of higher density development with municipal infrastructure, including multifamily units, disproportionately impacts minorities and low-income households who have a greater need for affordable housing.

Recommendations:

The Land Use & Zoning section of this report recommends specific actions to addressing zoning and other regulatory impediments to fair housing, including:

- Reducing minimum lot size and minimum floor area requirements and increasing density allowances. The map on page 105 depicts sewer communities in Waukesha County where residential zoning district maximum density and/or minimum floor area ratio requirements may restrict affordable multifamily housing. Additionally, the map on page 104 depicts sewer communities where residential zoning district minimum lot size and/or minimum floor area ratio requirements may restrict development of affordable single-family housing. Both maps present data based on the analysis of community zoning codes by SEWRPC in 2012.
- Expanding sanitary sewer services;
- Adopting flexible zoning regulations permitting higher densities and a mix of housing types;
- Relaxing limits on alternative types of affordable housing (e.g., accessory dwellings or manufactured homes);
- Adopting inclusionary zoning provisions; and
- Amending design regulations to promote flexibility in development and construction costs.

While Waukesha County adopted the *Regional Housing Plan's* recommendations into their Comprehensive Development Plan and other cities such as Oconomowoc have reduced zoning requirements to allow for more multifamily or high density housing development, not all study area municipalities have addressed zoning impediments. As administrator of CDBG and HOME funds, Waukesha County should take a lead role in educating HOME Consortium jurisdictions and advocating that they review their regulations and reduce any excessive barriers to development. The County should host a zoning workshop for local municipalities to review findings of the

SEWRPC report, discuss potential for code changes, and provide examples of communities that have successfully modified zoning code to reduce impediments to affordable housing. A parallel effort to encourage developers to offer a mix of housing types, sizes, and building materials in order to increase local affordable housing options should also be developed. Potential collaboration with SEWRPC should be explored, such as a staff member or other representative being present at a zoning workshop, or advising on other forms of outreach to HOME Consortium jurisdictions or developers.

Impediment #2: Lack of Fair Housing Knowledge

Research findings indicate a general lack of knowledge about fair housing laws and the fair housing complaint process amongst several groups within the study area. While the Metro Milwaukee Fair Housing Council's fair housing enforcement program serves Ozaukee, Washington, and Waukesha Counties, when asked where they would refer a client with a housing discrimination complaint, very few of the social service agencies and housing providers interviewed mentioned MMFHC, and most were unsure of where to refer complaints.

Similarly, the Housing and Community Development Needs Survey completed by community members as part of this research revealed that many study area residents are unsure of where to file a complaint as well. While the majority of respondents (91.4%) report knowing or somewhat knowing their fair housing rights, only 40.3% knew where to file a housing complaint. Further, of the 29 respondents who report having faced housing discrimination, only 3 pursued complaints. Of those that did not file a complaint, the most common reason was not knowing what good it would do to file.

A third study area group that may lack information about fair housing laws are landlords or rental property managers. Of the 87 housing complaints filed with HUD for the study area since 2006, the largest share (27.5%) cite refusal to rent as the fair housing issue. Additionally, of the 29 survey respondents who had faced housing discrimination, the majority (23 respondents, or 79.3%) report discrimination by a landlord or property manager. Further, stakeholders mentioned that while large property management companies typically train employees regarding fair housing laws, small-scale landlords are more likely to discriminate.

Recommendations:

Education is needed regarding fair housing laws and options for recourse when discrimination occurs. While MMFHC conducts outreach and education to several organizations in Waukesha County, more is needed. It is recommended that Waukesha County coordinate a fair housing seminar given by MMFHC (or a similar organization) and open to all sub-recipients and any other housing and social service agencies operating in the four-county study area. This seminar would allow housing and service organizations to learn more about local fair housing services and about how best to disseminate fair housing information to their clients. Staff members from study area municipalities should also be invited.

Education is also need for rental property owners and managers, especially small-scale landlords, on the requirements of the Fair Housing Act, the definitions of protected classes, discriminatory practices, and potential consequences for non-compliance. The Apartment Association of Southeastern Wisconsin offers limited education opportunities, but could play a coordinating role in the outreach and education of small-scale landlords in the study area. Support for continued testing by MMFHC (or a similar organization) is also recommended.

Impediment #3: Imbalance Between Job Centers and Affordable Housing Options

Many stakeholders identified an imbalance between the locations of affordable housing and job centers, or noted that a lack of affordable housing is likely to impede future economic development as businesses instead opt to locate in areas more affordable for their employees. SEWRPC's *Regional Housing Plan* notes that median monthly rents are high around several job centers (or anticipated job centers) in much of Waukesha County with the exception of the City of Waukesha, and in southern Ozaukee and southeastern Washington Counties. Because minority households tend to have lower incomes, they are less likely to be able to afford the higher housing costs around these job centers and must face either disproportionately long commute times or more limited employment options.

Recommendations:

The construction of new affordable and/or mixed-income housing would accomplish the goal of increased economic opportunity and greater standard housing available near job centers throughout the MSA. As economic development proceeds, care must be taken to ensure that housing development includes a variety of types and rents/price points to meet housing demand generated by employees at a range of incomes. Density bonuses, fee waivers or other incentives for development of workforce or mixed-income housing should be explored as options to spur investment and development. Education for elected officials and other local leaders on the benefits of providing a range of housing options, including housing for the local workforce is needed to develop additional support for these initiatives. The imbalance is a regional imbalance, impacting communities throughout the Milwaukee—West Allis—Waukesha MSA, and should be addressed in a cooperative manner by all the participating jurisdictions.

Impediment #4: NIMBY/Prejudiced Attitudes

Input received through interviews and meetings with over 50 stakeholders in the four-county study area reveals that opposition to affordable housing by the general public, whether due to economic and/or racial/ethnic prejudices, is prevalent in many areas. A variety of stakeholders including elected officials, city/county staff, housing developers, and community development workers described “Not In My Back Yard” (NIMBY) sentiments and a lack of understanding about affordable, workforce, and mixed-income housing as common amongst study area residents. The *MSP Real Estate, Inc. v. City of New Berlin* case exemplified the effect negative public opinion can have on housing development. While the New Berlin Planning Commission initially approved the project

and its zoning permit application, this decision was reversed following public opposition, requiring a lawsuit in order to ultimately obtain development approval.

Further, while segregation is low within the study area, the Milwaukee-Waukesha-West Allis MSA is one of the most segregated in the U.S. Prejudiced attitudes toward the development of affordable or mixed-income housing in the study area, and toward the low income or minority residents who may choose to live there, only sustains existing patterns of segregation in the region. The map on page 38 depicts the distribution of population by race and ethnicity in the MSA based on 2010 Census data.

Recommendations:

Education and awareness is imperative to alleviating NIMBYism and prejudiced attitudes. Lack of diversity and prejudiced personal beliefs create negative impacts on social conditions and discourse and can take many years to overcome. In the near term, education and awareness of both the value of diversity and the role of affordable housing in helping low income persons secure a safe, quality place to live is especially important.

Waukesha County should develop an appropriate diversity awareness curriculum and then make it available for staff. Waukesha County should also encourage a collaboration of area nonprofit organizations and sub-recipients under the CDBG and HOME programs to integrate appropriate diversity awareness updates into organizational development training.

Separate information to educate local leaders, elected officials, and the general public in study area jurisdictions regarding what affordable, workforce and mixed-income housing is and what economic benefits they offer should also be developed. The material should identify and publicize local examples of success, such as that of the Oconomowoc School Apartments in Oconomowoc and the City Center in New Berlin. Participation in regional housing initiatives should also be encouraged.

Impediment #5: Limited Housing Options for People with Disabilities and the Aging Population

One need identified in the *Regional Housing Plan* and through stakeholder outreach conducted for this study is additional housing for people with disabilities. Demographic data indicates that this need will likely be exacerbated as Baby Boomers age and begin to face the higher disability rates common to adults over the age of 65. Although definitive data on the availability of accessible housing units in the study area is not available, a search conducted using socialserve.com revealed that of the handicap accessible properties in the four-county area, 44.1% have a wait list. The *Regional Housing Plan* estimates a regional shortage, noting that there are approximately 61,640 accessible housing units in the region, compared to 169,000 households with one or more persons with a disability.

Recommendations:

It is recommended that Waukesha County meet with disability advocates to better understand types and locations of units missing from the current accessible housing stock and to identify best practices for or examples of design of accessible units. This information should then be shared with municipal staff in jurisdictions within the HOME Consortium counties, allowing them to prioritize public funding for housing developments that meet these identified needs. For other private/market-rate projects, educate developers about and encourage them to consider these needs.

Density bonuses or other incentives for projects built according to universal design principles such that all units are handicap accessible would open up new housing options and increase housing choice. For residential developments competing for public funding, those that offer universal design, or that otherwise exceed FHA minimum accessibility requirements (either in number of accessible units provided and/or in the design of these units) should be prioritized.

Introduction

Equal access to housing choice is a cornerstone principle of America's commitment to equality and opportunity for all. Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism, and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), and specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of HUD's housing and community development programs. These provisions flow from the mandate of Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing.³ A fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI), is required of HUD grantees receiving funds under the Community Development Block Grant (CDBG) and Home Investment Partnerships Act (HOME) programs. To perform this Analysis of Impediments, Waukesha County contracted with WFN Consulting.

Waukesha County is an entitlement community receiving CDBG funds from HUD and is also the lead agency for the four-county HOME Consortium that includes Waukesha, Jefferson, Washington, and Ozaukee Counties. These counties participate together in the Consortium for the purpose of accessing federal affordable housing funds under HUD's HOME program. Within the four-county area, there are 18 cities, 35 villages, and 45 towns. Through this regional analysis, the communities represented by the Consortium will have the informational basis from which to promote fair housing choices for all persons, provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities. By analyzing and taking actions to address identified impediments, the Waukesha County and the HOME Consortium can meet their obligations and certifications to HUD to affirmatively further fair housing.

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

Definitions & Data Sources

Definitions

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”⁴

Fair Housing Choice - In carrying out its Analysis of Impediments to Fair Housing Choice, the Consortium utilized the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

Impediments to Fair Housing Choice - As adapted from the *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include: ⁵

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected Classes - In carrying out its Analysis of Impediments to Fair Housing Choice, the Consortium utilized the following definitions of Protected Classes:

- Federally Protected Classes: Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.
- State of Wisconsin Protected Classes: The Wisconsin Open Housing Law prohibits housing discrimination based on any of the federally protected classes, and also extends anti-discrimination protection to six additional classes: sexual orientation, marital status, lawful source of income, age, ancestry, and status as a victim of domestic abuse, sexual assault, or stalking.

Affordable - Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

⁴ U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

⁵ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

- HUD defines "affordable" housing as housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.
- For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners insurance, and any homeowners' association fees.
- Housing affordable to a family of four with an income up to 80% of the area median income would carry a total monthly cost not exceeding \$1,406 in Waukesha, Washington, and Ozaukee County and \$1,374 in Jefferson County, as reported by the National Low Income Housing Coalition's 2014 *Out of Reach* data.

Data Sources Used in This Analysis

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- 2010 and 2000 Census Summary File 1 (SF 1) – This dataset contains what is known as “100 percent data,” meaning that it contains the data collected from every household that participated in the 2010 Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census; therefore, SF 3 data from the 2000 Census was the only tract-level data source available for some variables.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census's SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- 2012 ACS 1-Year Estimates – Based on data collected between January 2012 and December 2012, these single-year estimates represent the most current information available from the U.S. Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.
- ACS Multi-Year Estimates – More current than Census 2010 data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater. The 2008-2012 ACS 5-year estimates are used most often in this assessment.

Previous Works of Research – This AI is supported by, and in some cases builds upon, previous works of significant local research conducted for or within the region, including:

- A Regional Housing Plan for Southeastern Wisconsin: 2035 – This 2013 document was prepared by the Southeastern Wisconsin Regional Planning Commission, with an advisory committee that included representatives from local, county, and State government agencies; housing advocacy organizations; home builders and real estate agents; and research and policy institutions. Elements of this comprehensive study include regional analyses of the following: local plans and programs related to housing; existing housing stock including subsidized, tax credit, and accessible housing; factors influencing housing development such as zoning regulations and development costs; demographic and economic characteristics; discrimination and fair housing activities; and the balance between jobs and housing. The *Regional Housing Plan* also shares national best practices for affordable housing and neighborhood design, and provides recommendations for bolstering affordable and fair housing within southeastern Wisconsin.

Stakeholder Engagement

Housing & Community Development Survey – This survey was designed to collect input from a broad spectrum of the community and received responses from residents across the four-county study area. The survey consisted of 29 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were over 383 responses to this survey (299 English responses and 84 Spanish responses), though not every question was answered by every respondent. As a result, where a percentage of survey respondents is cited in this assessment, it refers only to the percentage of respondents to the particular question being discussed and may not be a percentage of the full number of survey respondents. Surveys were received over a 23-day period, from August 9, 2014 to August 31, 2014. Paper surveys received were manually entered by the Survey Administrator into SurveyMonkey for tabulation and analysis. To prevent “ballot stuffing,” the SurveyMonkey software bars the submission of multiple surveys from a single IP address.

The online survey was available through the project's website, which was included on all public notices advertising community meetings, distributed to more than 260 contacts via email distribution lists provided by Waukesha County, provided at each public meeting and to all stakeholders interviewed, and posted on the Waukesha County Community Development Department's website (www.waukeshacounty.gov/defaultwc.aspx?id=41442). Hard copies of the survey were also made available at each community meeting and to any sub-recipients interested in sharing hard copies with their clients. A Spanish translation of the same survey was also made available in hard copy and online.

Project Website - To promote the Consolidated Plan, Annual Action Plan, and Analysis of Impediments planning process with local residents, employees, and other stakeholders, WFN Consulting prepared a website dedicated to the project (www.waukeshacountyconplan.com). The site included an overview of the project, the public meeting schedule and copies of presentations made at the public meetings, links to English and Spanish versions of the housing and community development survey, an opportunity to provide comments, and links to more information about the CDBG and HOME programs, the Waukesha County Community Development Department, and the HOME Consortium. The site was included in all public meeting notices, advertised at public meetings and on the Waukesha County Community Development Department's website, and provided in email correspondence with all stakeholder interview participants. The site had 336 unique visitors since its launch on August 4, 2014, and one comment was received through it.

Stakeholder Interviews – Key community stakeholders were identified, contacted, and interviewed individually as part of this Analysis. These stakeholders included elected officials, representatives of nonprofit organizations, municipal and county staff, fair housing advocates, lenders, and real estate agents. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis. Thirty stakeholder interviews were conducted.

Public Meetings – Six public meetings were held in order to provide forums for residents of the study area and other interested parties to contribute to this AI. Meeting dates, times, and locations are listed below. Meetings were held both during the day and in the evenings in various locations across the region, providing a variety of options for residents to attend. These meetings were advertised via public notices in local newspapers and through email notifications sent by WFN Consulting to over 260 contacts provided by Waukesha County (including contacts in each of the four counties comprising the study area). The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of public comments at all meetings.

Public Kickoff Meeting

Waukesha County Administration Building

Waukesha, WI

Monday, August 11, 2014

1:30 p.m.

Jefferson County Neighborhood Meeting

UW Extension/Workforce Development

Jefferson, WI

Monday, August 11, 2014

4:00 p.m.

Waukesha County Neighborhood Meeting

Oconomowoc Public Library

Oconomowoc, WI

Monday, August 11, 2014

6:00 p.m.

Ozaukee County Neighborhood Meeting

Cedarburg Cultural Center

Cedarburg, WI

Tuesday, August 12, 2014

6:00 p.m.

Washington County Neighborhood Meeting

HHS/Public Agency Center

West Bend, WI

Tuesday, August 12, 2014

6:00 p.m.

Waukesha County Neighborhood Meeting

Citizens Bank of Mukwonago

Waukesha, WI

Wednesday, August 13, 2014

6:00 p.m.

CDBG and HOME Board Meetings – Presentations regarding the Consolidated Plan, Annual Action Plan, and Analysis of Impediments to Fair Housing Choice were made at the HOME Consortium’s Board meeting held on Tuesday, August 12, 2014 at 1:00 p.m. and at the Waukesha County’s CDBG Board meeting held on Wednesday, August 13, 2014 at 3:15 p.m. Meetings provided Board members the opportunity to give input on priority housing and community development needs, successful recent initiatives, potential new uses of HUD funds, fair housing activities, and access to housing for protected classes within the region.

Limitations of this Analysis

This Analysis of Impediments to Fair Housing Choice was prepared by WFN Consulting for Waukesha County and the Waukesha County HOME Consortium, which includes Waukesha, Jefferson, Ozaukee, and Washington Counties. This report seeks to analyze the current fair housing climate in this region, identify impediments to fair housing choice and equity, and set forth recommended strategies for overcoming the identified impediments. Some of the impediments identified in this report will require additional research and on-going analysis by entities within the region. This report does not constitute a fair housing action plan or any other type of community plan, however, it should be a key resource to inform such plans as they are developed.

HUD's primary guidance for developing Analyses of Impediments is found in the Fair Housing Planning Guide, published in 1996. Since that time, HUD's approach to fair housing has greatly evolved and formal guidance has largely yet to catch up. In 2013, HUD released a new proposed rule titled "Affirmatively Furthering Fair Housing" that outlines significant changes to the development of local fair housing studies. Because this proposed rule has yet to be finalized, the methodology and components of this AI, to the greatest extent possible, meet both the revised criteria of the proposed rule as well as the traditional AI requirements found in the Fair Housing Planning Guide.

Though licensed attorneys with land use and fair housing experience have participated in the research contained herein, no portion of this Analysis shall constitute or be relied upon as legal advice or as a legal opinion.

Throughout this analysis, the authors have made careful decisions regarding which datasets to use. The choice of a dataset often involves tradeoffs between criteria. For example, more recent datasets often have a limited number of data variables available for analysis. Additionally, there is the unavoidable tradeoff between geographic and socioeconomic detail (less detailed data for smaller geographies) that sometimes restricts the availability of data. Also, the detailed definitions of data variables can change over time limiting their comparability.

Finally, all source data used in the preparation of this analysis, whether from national sources (e.g. the U.S. Census Bureau), local sources (e.g. SEWRPC's *Regional Housing Plan*), or from proprietary sources (e.g. the National Low Income Housing Coalition's *Out of Reach* report) is assumed to be accurate.

Historical Overview

Waukesha County is located in southeastern Wisconsin and is home to more than 390,000 people and 37 municipalities within 576 square miles of suburban and rural areas.⁶ Waukesha has a total of 6 percent of the population of the state of Wisconsin and is the 3rd most populous county in Wisconsin. The County encompasses 7 cities, 18 villages, and 12 towns, as shown on the map at the end of this section.

Waukesha County is located 15 miles west of the City of Milwaukee, 60 miles east of the City of Madison, and 100 miles northwest of Chicago. Waukesha County was once home to Native American tribes such as, Effigy Mound Builders and the Potawatomis, in the 1700.⁷ During 1870 and 1920, Waukesha County grew from rural villages to vibrant cities and towns. The 1870s commenced the start of the Springs Era in the City of Waukesha in which several mineral springs were discovered and waters bottled.⁸ As a result, Waukesha's beverage and bottling industry flourished. The County became known as the "Saratoga of the West," and was recognized as the ideal relaxation destination.⁹

Throughout the years, farming and manufacturing were also vital industries for development in Waukesha County. Limestone mined from the County was utilized for many local buildings and the surrounding areas. These industries were instrumental in aiding the major rail lines connecting Waukesha to other states. The County was once called "Cow County USA" but now has developed a diverse industrial base and is home to some of the world's leading manufacturers and businesses.

Government

Waukesha County is governed by a county executive form of government who is elected to a four-year term and a 25-member Board of Supervisors who are elected to two-year terms in even numbered years. The Executive is responsible for coordinating and directing all administrative and management functions of the County which is not vested in other elected officials. The Executive has the power to appoint the heads of all County departments, except those headed by elected officials or State statutory boards and commissions.¹⁰ The County's fiscal year runs from January 1 to December 31.

⁶ Waukesha County Government, <http://www.waukeshacounty.gov/defaultwc.aspx?id=37688>

⁷ Waukesha County Government, <http://www.waukeshacounty.gov/defaultwc.aspx?id=37688>

⁸ University of Wisconsin Digital Collection, Waukesha County History
<http://uwdc.library.wisc.edu/collections/WI/WaukeshaCoHist>

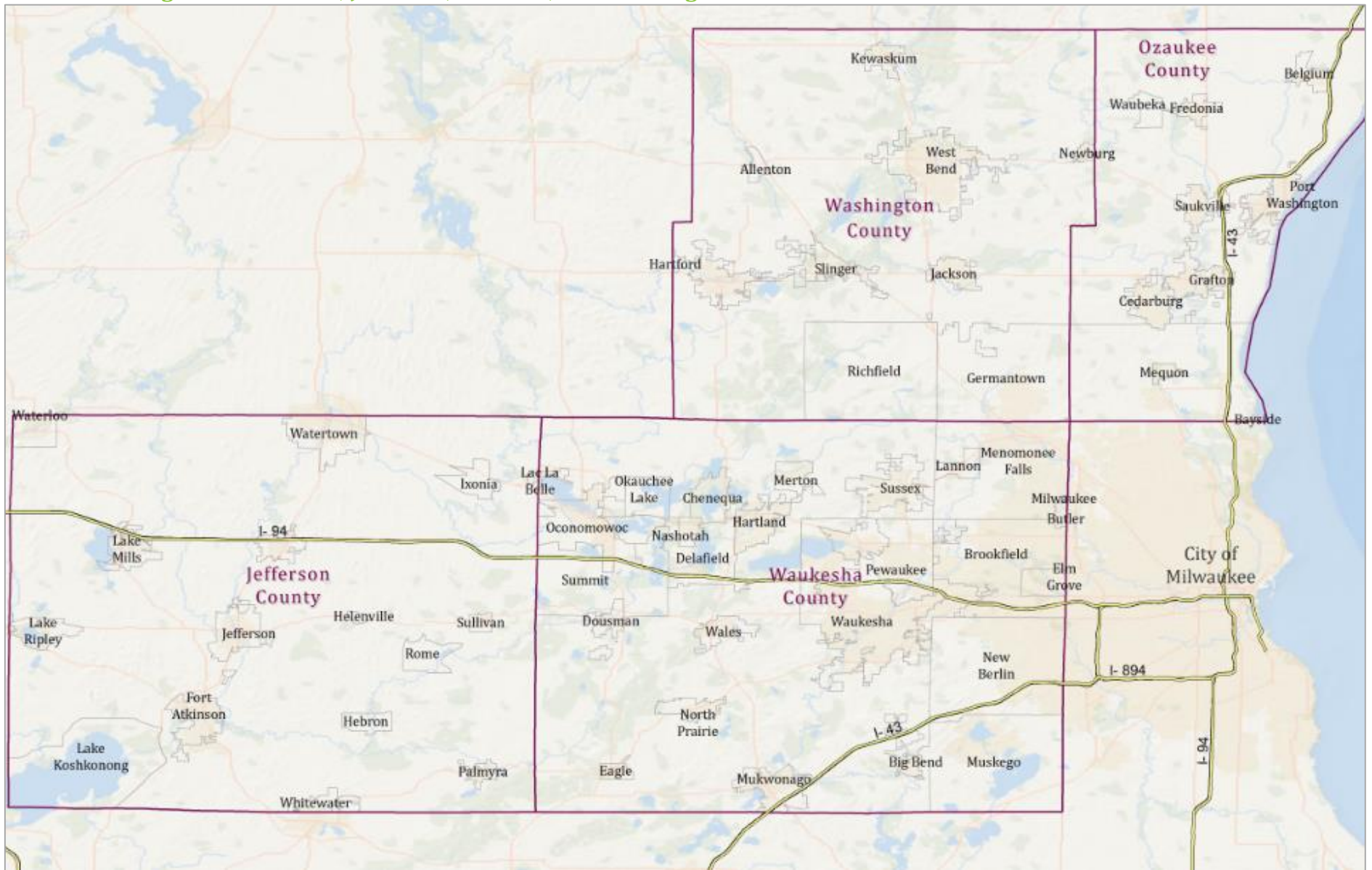
⁹ Ibid.

¹⁰ Waukesha County Government, <http://www.waukeshacounty.gov/defaultwc.aspx?id=37688>

The HOME Consortium

Since 1998, the Counties of Jefferson, Washington, and Waukesha have participated as a HOME Consortium and in 1999, Ozaukee County agreed to participate in the Consortium. The Consortium allows local governments that would not otherwise qualify for funding to join with other contiguous units of local government to directly participate in the HOME Investment Partnerships Program (HOME). Every municipality in Jefferson, Ozaukee, Washington and Waukesha Counties, with the exception of Sullivan (Jefferson County) and Chenequa and Oconomowoc Lake (Waukesha County), has formally approved participation in the HOME Consortium. The Consortium assists in providing affordable housing options in the region by providing down payment assistance, acquisition/rehabilitation assistance, and low-interest housing rehabilitation loans.

Cities and Villages in Waukesha, Jefferson, Ozaukee, and Washington Counties



Source: U.S. Census TIGER boundary files

Socioeconomic Overview

This section presents demographic and economic information collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data was used to analyze a broad range of socioeconomic characteristics, including population growth, age, employment, income, and poverty. Ultimately, the information presented in this section helps illustrate the underlying conditions that have shaped housing market behavior and housing choice in the study area.

To supplement 2000 and 2010 census data, information for this analysis was also gathered from the Census Bureau’s American Community Survey (ACS). The ACS data covers similar topics as the decennial counts, but also includes data not appearing in the 2010 census such as household income and poverty. The key difference in these datasets is that ACS data represents samples as opposed to a 100 percent count; however, population distributions from the ACS data can be compared to those from the census.

Population Dynamics

The table below shows the population counts in the HOME Consortium counties, as drawn from the 2000 and 2010 censuses and 2013 American Community Survey estimates. In total, the population in the region has increased from 634,598 persons in 2000 to 698,145 persons in 2010, or by 10.0%. According to the 2013 American Community Survey, the population total consists of Waukesha County with a population of 393,843 persons, 84,509 residents in Jefferson County, 87,054 in Ozaukee County and 132,739 in Washington County.

Population Change in the 4-County Study Area, 2000 to 2013				
Jurisdiction	2000	2010	2013	% Change 2000-2013
Waukesha County	360,767	389,891	393,843	9.1%
Jefferson County	74,021	83,680	84,509	14.1%
Ozaukee County	82,317	86,349	87,054	5.7%
Washington County	117,493	131,905	132,739	12.9%
Total	634,598	691,825	698,145	10.0%

Source: 2000 and 2010 U.S. Census and American Community Survey 2013 1-Year Estimates

Population by Age

Data on population by age in 2000, 2010, and 2013 in the HOME Consortium counties, presented on the following pages, reflects the largest population groups represented persons aged 5 to 19 and 35 to 54. However, these two age cohorts were also the only groups to show a decrease in population between 2000 and 2013. On the other hand, the cohort aged 55 to 64 showed a significant increases of more than 63 percent or more in all jurisdictions during this time, and the number of persons aged 20 to 24 and 65 or older both showed increases of more than 15 percent or more in each jurisdiction.

Population By Age Waukesha County, Wisconsin							
Age	2000 Census		2010 Census		2013 ACS		00 - 13 % Change
	Population	Share of Total	Population	Share of Total	Population	Share of Total	
Under 5 years	23,096	6.4%	21,474	5.5%	20,334	5.2%	-11.9%
5 to 19	80,166	22.2%	80,913	20.8%	78,908	20.0%	-1.6%
20 to 24	16,226	4.5%	18,304	4.7%	19,844	5.0%	22.2%
25 to 34	42,266	11.7%	40,172	10.3%	41,489	10.5%	-1.8%
35 to 54	121,648	33.7%	120,175	30.8%	112,514	28.6%	-7.5%
55 to 64	33,931	9.4%	53,165	14%	57,944	14.7%	70.7%
65 and Over	43,434	12.0%	55,688	14.3%	62,810	15.9%	44.6%
Total	360,767	100.0%	389,891	100.0%	393,843	100.0%	9.1%

Source: 2000 and 2010 U.S. Census and American Community Survey 2013 1-Year Estimates

Population By Age Jefferson County, Wisconsin							
Age	2000 Census		2010 Census		2013 ACS		00 - 13 % Change
	Population	Share of Total	Population	Share of Total	Population	Share of Total	
Under 5 years	4,695	6.3%	4,786	5.7%	4,688	5.5%	-0.1%
5 to 19	15,989	21.6%	18,284	21.9%	17,601	20.8%	10.0%
20 to 24	4,278	5.8%	5,677	4862.0%	5,227	6.2%	22.1%
25 to 34	10,042	13.6%	9,608	11.5%	10,114	12%	0.7%
35 to 54	22,886	31.0%	24,093	28.8%	23,357	27.6%	2.1%
55 to 64	6,772	9.1%	10,210	12.2%	11,300	13.4%	66.8%
65 and Over	9,359	12.6%	11,035	13.1%	12,222	14.5%	30.5%
Total	74,021	100.0%	83,693	4955%	84,509	100%	14.1%

Source: 2000 and 2010 U.S. Census and American Community Survey 2013 1-Year Estimates

Population By Age Ozaukee County, Wisconsin							
Age	2000 Census		2010 Census		2013 ACS		00 - 13 % Change
	Population	Share of Total	Population	Share of Total	Population	Share of Total	
Under 5 years	5,069	6.2%	4,839	5.6%	4,420	5.1%	-12.8%
5 to 19	18,935	23%	17,450	20.2%	17,494	20.1%	-7.6%
20 to 24	3,551	4.3%	4,565	5.3%	4,726	5.4%	33.0%
25 to 34	8,435	10.2%	8,046	9.3%	8,358	9.6%	-0.9%
35 to 54	27,821	33.8%	25,672	29.7%	24,037	27.6%	-13.6%
55 to 64	8,149	9.9%	12,471	15%	13,351	15.3%	63.8%
65 and Over	10,357	12.6%	13,322	15.5%	14,668	16.8%	41.6%
Total	82,317	100.0%	86,365	100%	87,054	100.0%	5.7%

Source: 2000 and 2010 U.S. Census and American Community Survey 2013 1-Year Estimates

Population By Age Washington County, Wisconsin							
Age	2000 Census		2010 Census		2013 ACS		00 - 13 % Change
	Population	Share of Total	Population	Share of Total	Population	Share of Total	
Under 5 years	7,970	6.8%	8,076	6.1%	7,239	5.5%	-9.1%
5 to 19	26,146	22.3%	27,454	20.8%	26,530	20.0%	1.5%
20 to 24	5,645	4.8%	6,105	4.6%	6,512	4.9%	15.3%
25 to 34	15,425	13.1%	14,461	11%	14,362	10.8%	-6.8%
35 to 54	38,660	32.9%	41,175	31.2%	39,399	29.7%	1.9%
55 to 64	10,435	8.9%	16,791	12.8%	18,592	14.0%	78.1%
65 and Over	13,212	11.3%	17,909	13.6%	20,105	15.1%	52.1%
Total	117,493	100.1%	131,971	100%	132,739	100.0%	12.9%

Source: 2000 and 2010 U.S. Census and American Community Survey 2013 1-Year Estimates

Economic Analysis

Labor Force and Employment

Data regarding the labor force, defined as the total number of persons working or looking for work, and employment, or the number of persons working, as gathered from the decennial census and American Community Survey estimates are presented below. As shown, labor force and employment figures in the Waukesha County Consortia reflects increases in the number of persons employed in 2010 and a decrease in the number of persons unemployed in 2012.

Employment Status by County								
Employment Status	Jefferson County		Ozaukee County		Washington County		Waukesha County	
	# of Persons	% of Pop.	# of Persons	% of Pop.	# of Persons	% of Pop.	# of Persons	% of Pop.
2010								
Employed	12,053	46.7%	45,682	67.0%	70,802	68.6%	205,443	66.9%
Unemployed	914	3.5%	2,783	4.1%	4,699	4.6%	12,109	3.9%
2012								
Employed	11,254	43.1%	44,329	64.1%	70,772	67.9%	204,093	65.6%
Unemployed	1,402	5.4%	2,793	4.0%	4,639	4.5%	13,382	4.3%

Source: 2000 and 2010 U.S. Census and American Community Survey 2013 1-Year Estimates

Labor Force and Total Employment

According to the Bureau of Labor Statistics, the yearly unemployment rate in the Milwaukee-Waukesha-West Allis Metropolitan Statistical Area was at its highest in the five-year period at 8.9% in 2009. As a result of the fluctuating labor force and employment rates, the unemployment rate rose to over 8 percent in 2009 but fell to 7.3% in 2013.

Unemployment Rates Milwaukee-Waukesha-West Allis, WI Metropolitan Statistical Area					
Year	2009	2010	2011	2012	2013
Unemployment Rate	8.9%	8.9%	8.0%	7.5%	7.3%

Source: Bureau of Labor Statistics Local Area Unemployment, <http://www.bls.gov/lau/lamtrk09.htm>

Household Income

The following table presents the number of households in the HOME Consortium counties by income range, as derived from the 2010 and 2012 ACS estimates. As reflected in the 2010 ACS, Waukesha County, 6.0% of households had incomes under \$15,000, and an additional 7.8% of households had incomes between \$15,000 and \$24,999. Comparatively, in the counties of Jefferson, Ozaukee, and Washington the majority of households had income between \$50,000 and \$74,999. More recent ACS data showed that the percentage of households within the Consortia with incomes of \$75,000 and above increased in the 2012 census data with the exception of Waukesha County. This finding suggests that incomes in the County have improved slightly over time.

Households by Income in 2010 and 2012								
Income Range	Jefferson County		Ozaukee County		Washington County		Waukesha County	
	Households	Percent	Households	Percent	Households	Percent	Households	Percent
2010								
Less than \$10,000	1,530	4.8%	681	2%	630	1.2%	5,020	3.3%
\$10,000 to \$14,999	2,151	6.7%	1,280	3.8%	2,145	4.2%	4,146	2.7%
\$15,000 to \$24,999	3,746	11.7%	2,672	7.9%	5,458	10.7%	11,744	7.8%
\$25,000 to \$34,999	3,926	12.3%	3,208	9.4%	4,922	9.6%	13,542	9.0%
\$35,000 to \$49,999	4,689	14.7%	3,609	10.6%	7,625	14.9%	17,904	11.8%
\$50,000 to \$74,999	7,127	22.3%	6,208	18.2%	9,842	19.2%	27,389	18.1%
\$75,000 to \$99,999	3,769	11.8%	4,841	14.2%	8,358	16.3%	23,649	15.6%
\$100,000 to \$149,999	3,435	10.8%	7,261	21.3%	8,538	16.7%	28,562	18.9%
\$150,000 to \$199,999	867	2.7%	1,606	4.7%	2,314	4.5%	9,707	6.4%
\$200,000 or more	655	2.1%	2,661	7.8%	1,396	2.7%	9,450	6.3%
TOTALS	31,895	100%	34,027	100%	51,228	100%	151,113	100%
2012								
Less than \$10,000	1,914	5.9%	1,012	2.9%	1,742	3.4%	4,978	3.2%
\$10,000 to \$14,999	1,189	3.7%	966	2.8%	1,651	3.2%	4,510	2.9%
\$15,000 to \$24,999	3,180	9.8%	2,678	7.8%	4,306	8.3%	10,874	7.1%
\$25,000 to \$34,999	3,455	10.7%	2,599	7.6%	5,329	10.3%	11,940	7.7%
\$35,000 to \$49,999	5,280	16.3%	4,026	11.7%	6,306	12.2%	18,272	11.9%
\$50,000 to \$74,999	6,038	18.7%	5,849	17.0%	10,980	21.2%	29,653	19.2%
\$75,000 to \$99,999	5,515	17.0%	5,116	14.9%	7,540	14.5%	22,994	14.9%
\$100,000 to \$149,999	4,284	13.2%	6,138	17.9%	8,703	16.8%	29,840	19.4%
\$150,000 to \$199,999	892	2.8%	2,875	8.4%	2,622	5.1%	10,666	6.9%
\$200,000 or more	613	1.9%	3,106	9.0%	2,658	5.1%	10,462	6.8%
TOTALS	32,360	100%	34,365	100%	51,837	100%	154,189	100%

Source: U.S. Census Bureau, American Community Survey 2010 and 2012 1-Year Estimates

Poverty

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps. Further, poverty is not defined for persons in military barracks, institutional group quarters, or for unrelated individuals under age 15 such as foster children.

The table follow reflects the persons in poverty by age throughout the Waukesha County Consortia. As noted in both the 2010 and 2012 ACS, Jefferson County had the largest percentage of persons 18 and under in poverty.

Persons in Poverty by Age, 2010 and 2012								
Age	Jefferson County		Ozaukee County		Washington County		Waukesha County	
	Number of Households	% of Population	Number of Households	% of Population	Number of Households	% of Population	Number of Households	% of Population
2010								
18 and Under	3,900	20.2%	972	4.9%	3,547	11.0%	8,114	8.7%
18 to 64	5,528	10.8%	3,807	7.2%	3,634	4.5%	14,149	5.9%
65 and Older	286	2.7%	411	3.1%	500	2.8%	2,109	4.0%
2012								
18 and Under	2,144	11.3%	1,183	6.2%	2,379	7.7%	8,119	9.1%
18 to 64	5,305	10.4%	2,768	5.3%	4,980	6.1%	12,307	5.1%
65 and Older	975	8.5%	735	5.3%	632	3.4%	2,555	4.4%

Source: U.S. Census Bureau, American Community Survey 2010 and 2012 1-Year Estimates

Protected Class Analysis

The Fair Housing Act lists seven prohibited bases for housing discrimination:¹¹ race, color, national origin, sex, familial status, disability, and religion. Wisconsin’s Open Housing Law guarantees equal housing opportunity for these and six additional protected classes including sexual orientation, marital status, lawful source of income, age, ancestry, and status as a victim of domestic violence, domestic abuse, or stalking. This analysis addresses each of the federally protected groups and their geographic distribution in Waukesha, Washington, Ozaukee, and Jefferson Counties.

Race and Ethnicity

As of 2010, the vast majority of the population within the study area was non-Hispanic White (91.6%). Hispanic residents made up 3.9% of the 4-county area, followed by Asians (2.0%) and African Americans (1.1%). Remaining minorities (American Indians, Alaska Natives, Native Hawaiians, Pacific Islanders, and persons of other or multiple races) constituted less than 1.5% combined.

Between the last two censuses, racial and ethnic diversity increased slightly within the Study Area. The non-Hispanic White population grew by the largest total number of persons (31,620) but increased at the lowest rate (5.2%). Two racial groups nearly doubled their population: the number of Asian residents grew by 6,923 (or 96.0%) and the number of Black residents grew by 3,653 (or 92.2%). Hispanic and multi-racial populations also saw strong growth with rates of 78.5% and 67.5%, respectively.

Population by Race and Ethnicity in the 4-County Study Area					
Race by Ethnicity	2000		2010		2000-2010 Change
	Count	Share	Count	Share	
Non-Hispanic	619,462	97.6%	664,840	96.1%	7.3%
White	602,434	94.9%	634,054	91.6%	5.2%
Black or African American	3,960	0.6%	7,613	1.1%	92.2%
American Indian/Alaska Native	1,324	0.2%	1,594	0.2%	20.4%
Asian	7,209	1.1%	14,132	2.0%	96.0%
Native Hawaiian/Pacific Islander	123	0.0%	172	0.0%	39.8%
Other race	315	0.0%	414	0.1%	31.4%
Two or more races	4,097	0.6%	6,861	1.0%	67.5%
Hispanic or Latino	15,136	2.4%	27,019	3.9%	78.5%
Total Population	634,598	100.0%	691,859	100.0%	9.0%

Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

¹¹ *Live Free: Annual Report on Fair Housing FY 2010*, U.S. Department of Housing and Urban Development.

Hispanic population growth and a stagnant/decreasing White population are not unique to the study area. Nationally, the Hispanic population grew by 43.0% from 2000 to 2010, well above the population growth rate for Whites of 1.2%. Further, despite increasing minority population shares, the study area remains drastically less diverse than metro Milwaukee. As of the 2010 Census, 69.0% of the Milwaukee-Waukesha-West Allis Metropolitan Statistical Area (MSA) population was non-Hispanic White, 16.4% was Black, 2.9% was Asian, and 9.5% was Hispanic. Research conducted for the US2010 project further illustrates this divide in finding that metro Milwaukee was the country's 2nd most segregated MSA in 2010 in terms of residential patterns between Black and White residents, and 13th in terms of residential patterns between Hispanic and White residents.¹² These indices will be further explored in the Segregation Analysis section of this report.

The table on the following page shows racial and ethnic composition of the population by county and indicate that trends are relatively similar across all four counties. In each, non-Hispanic White residents make up at least 90% of the population, followed by Hispanic residents who constitute between 2.3% (in Ozaukee County) and 6.6% (in Jefferson County). Jefferson and Washington Counties saw the most significant population growth between 2000 and 2010, and also the largest percentage increase in Black and Hispanic residents. The Black population increased by 241.3% in Jefferson County and 149.4% in Washington County. Comparable Hispanic population growth rates were 83.3% and 121.4%, respectively. Improved equality in terms of access to housing will be a crucial factor in promoting continued diversity in the study area, and safeguarding the fair housing rights of current residents who are members of racial and ethnic protected classes.

The maps on the following pages show the racial and ethnic composition of the study area by census tract. The study area's Black population is most concentrated in Waukesha and the area to the west along I-94, Menomonee Falls, and Mequon. African American residents do not constitute more than 3% of tract population in any other areas.

The study area's Asian population is most concentrated in the municipalities surrounding the Milwaukee city limits. Three census tracts in Brookfield and Waukesha have Asian populations above 8%, and 22 tracts in New Berlin, Brookfield, Pewaukee, Menomonee Falls, Mequon, and Germantown have Asian populations of 4.1% to 8%.

Hispanic residents make up a relatively large share of the population in four tracts in Waukesha and one in Fort Atkinson (15.1% or more). Other areas of moderate concentration (10.1% to 15%) include tracts in Jefferson, Palmyra, and Watertown in Jefferson County, and three additional tracts in Waukesha.

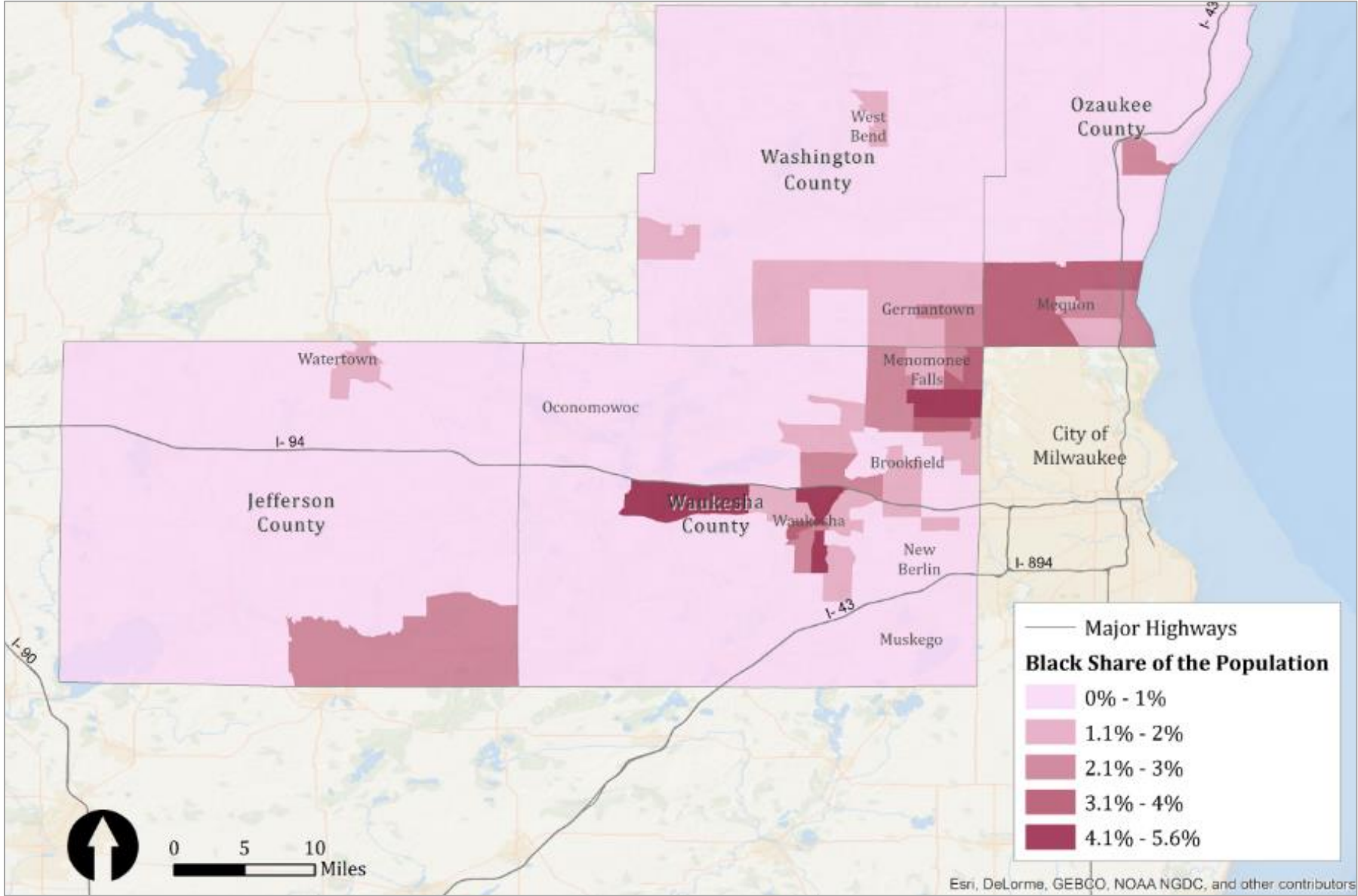
¹² "Data: Residential Segregation." *US2010: Discover America in a New Century*. American Communities Project: Brown University. <http://www.s4.brown.edu/us2010/SegSorting/Default.aspx>

Population by Race and Ethnicity by County for the 4-County Study Area

Race by Ethnicity	2000		2010		2000-2010 Change	2000		2010		2000-2010 Change
	Count	Share	Count	Share		Count	Share	Count	Share	
	Waukesha County					Washington County				
Non-Hispanic	351,264	97.4%	373,768	95.9%	6.4%	115,964	98.7%	128,502	97.4%	10.8%
White	339,905	94.2%	353,114	90.6%	3.9%	113,870	96.9%	124,348	94.3%	9.2%
Black or African American	2,570	0.7%	4,726	1.2%	83.9%	447	0.4%	1,115	0.8%	149.4%
American Indian/Alaska Native	685	0.2%	863	0.2%	26.0%	275	0.2%	345	0.3%	25.5%
Asian	5,340	1.5%	10,675	2.7%	99.9%	666	0.6%	1,401	1.1%	110.4%
Native Hawaiian/Pacific Islander	71	0.0%	117	0.0%	64.8%	28	0.0%	22	0.0%	-21.4%
Other race	186	0.1%	252	0.1%	35.5%	50	0.0%	51	0.0%	2.0%
Two or more races	2,507	0.7%	4,021	1.0%	60.4%	628	0.5%	1,220	0.9%	94.3%
Hispanic or Latino	9,503	2.6%	16,123	4.1%	69.7%	1,529	1.3%	3,385	2.6%	121.4%
Total Population	360,767	100.0%	389,891	100.0%	8.1%	117,493	100.0%	131,887	100.0%	12.3%
	Ozaukee County					Jefferson County				
Non-Hispanic	81,244	98.7%	84,439	97.7%	3.9%	70,990	95.9%	78,131	93.4%	10.1%
White	78,894	95.8%	80,689	93.4%	2.3%	69,765	94.3%	75,903	90.7%	8.8%
Black or African American	759	0.9%	1,144	1.3%	50.7%	184	0.2%	628	0.8%	241.3%
American Indian/Alaska Native	148	0.2%	174	0.2%	17.6%	216	0.3%	212	0.3%	-1.9%
Asian	880	1.1%	1,505	1.7%	71.0%	323	0.4%	551	0.7%	70.6%
Native Hawaiian/Pacific Islander	11	0.0%	20	0.0%	81.8%	13	0.0%	13	0.0%	0.0%
Other race	49	0.1%	54	0.1%	10.2%	30	0.0%	57	0.1%	90.0%
Two or more races	503	0.6%	853	1.0%	69.6%	459	0.6%	767	0.9%	67.1%
Hispanic or Latino	1,073	1.3%	1,956	2.3%	82.3%	3,031	4.1%	5,555	6.6%	83.3%
Total Population	82,317	100.0%	86,395	100.0%	5.0%	74,021	100.0%	83,686	100.0%	13.1%

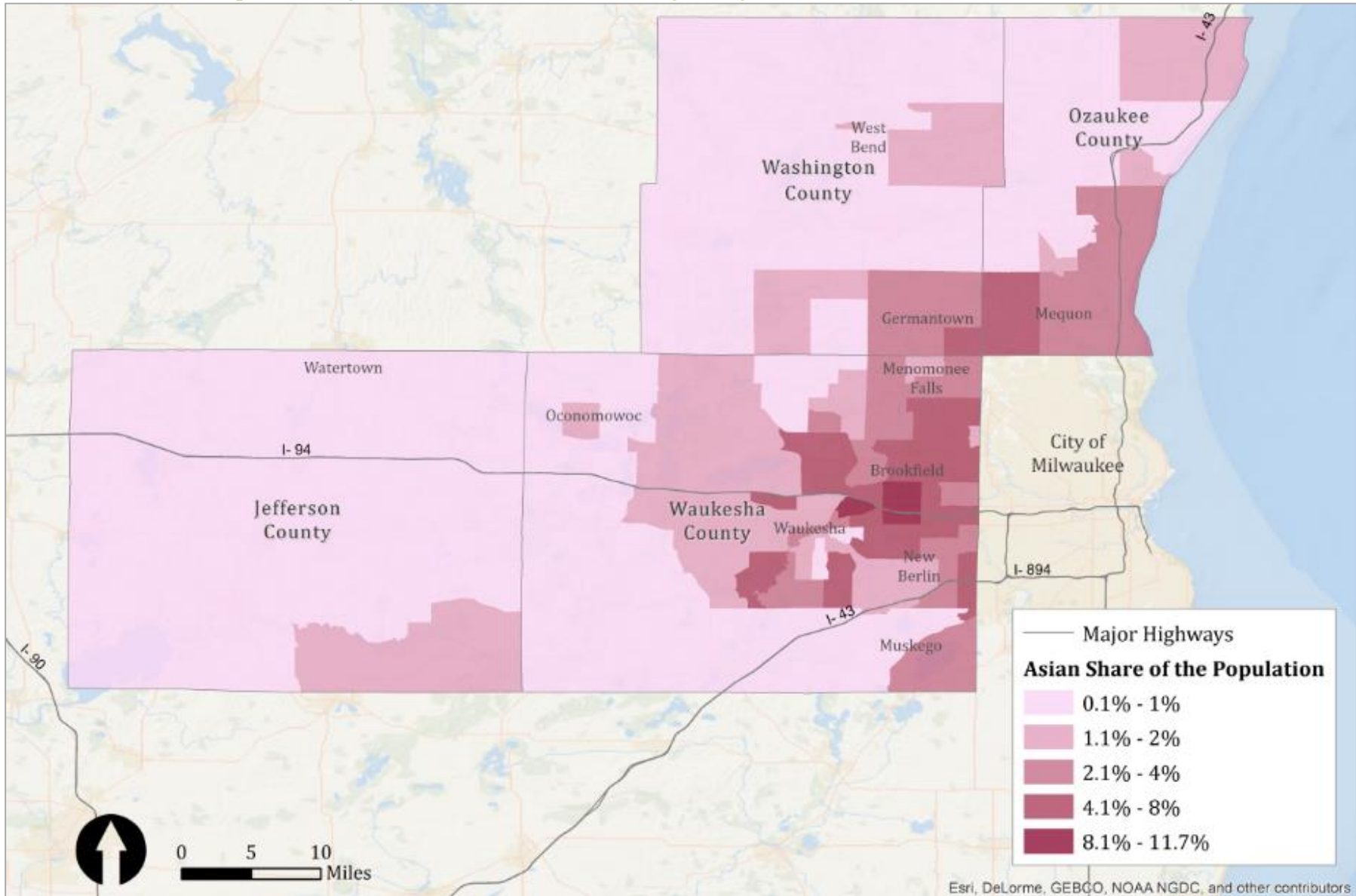
Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Black Share of the Population by Census Tract in the 4-County Study Area, 2010



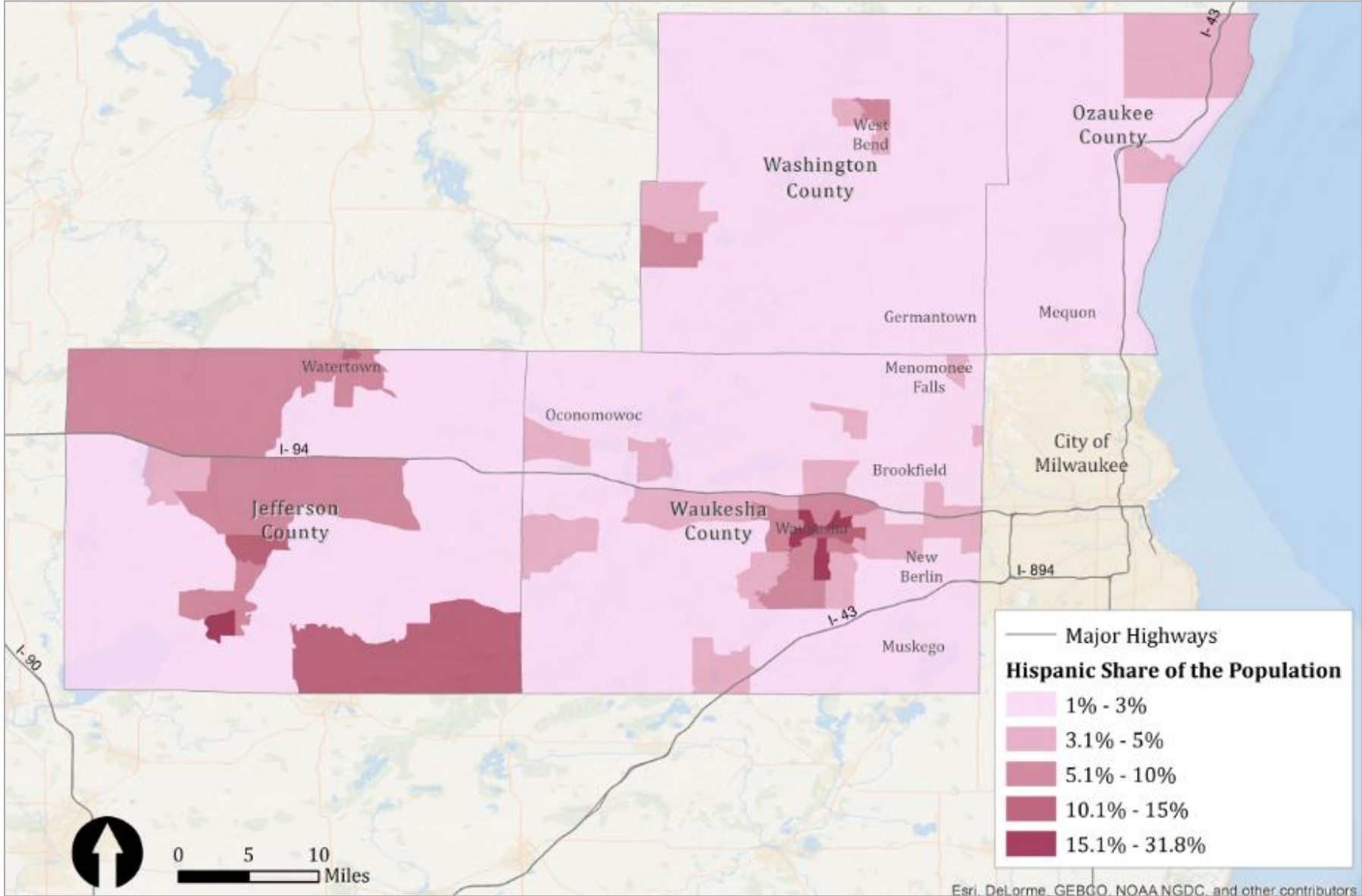
Source: U.S. Census 2010 SF1 Table P5

Asian Share of the Population by Census Tract in the 4-County Study Area, 2010



Source: U.S. Census 2010 SF1 Table P5

Hispanic Share of the Population by Census Tract in the 4-County Study Area, 2010



Source: U.S. Census 2010 SF1 Table P5

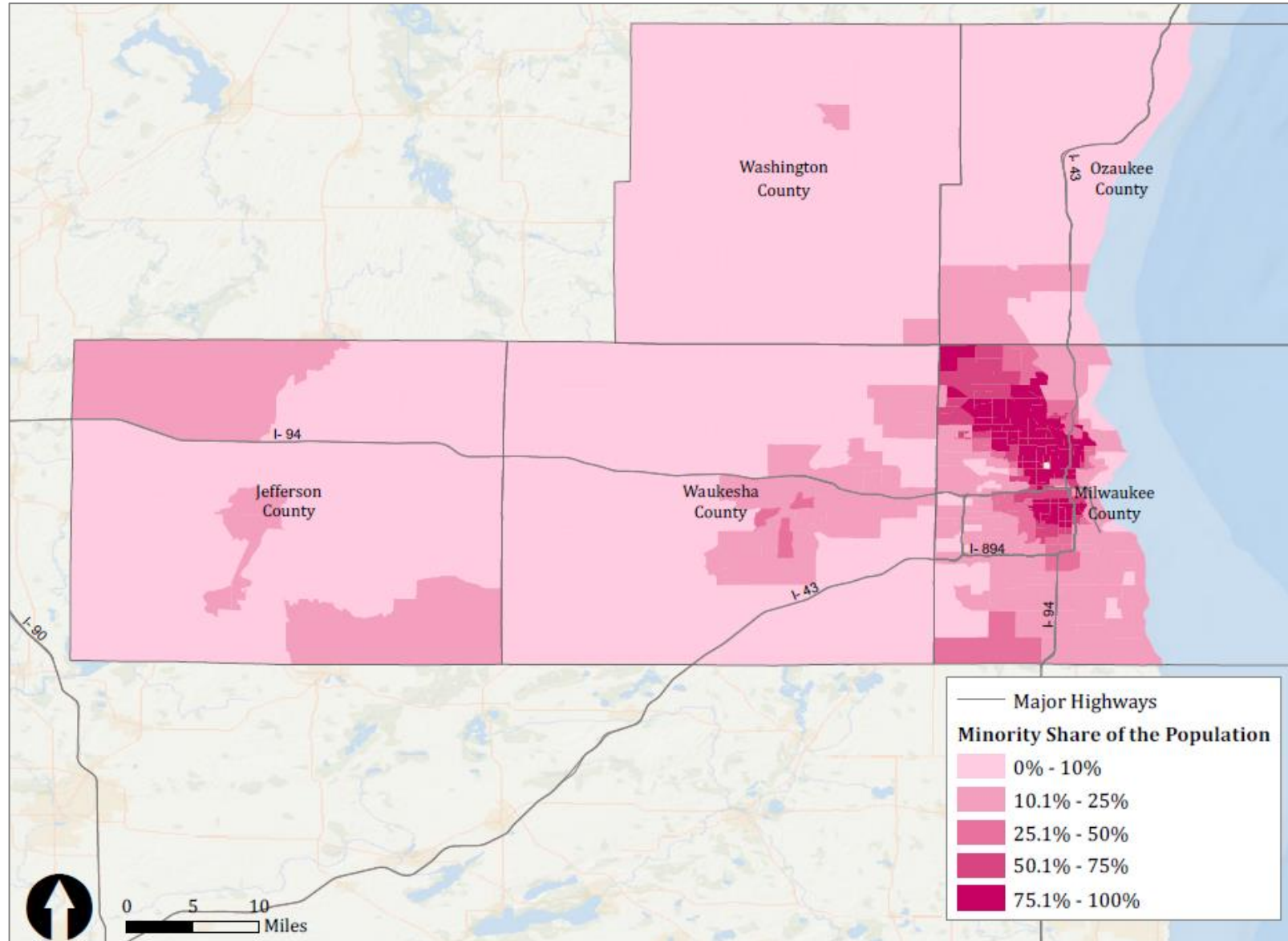
The map on the following page shows minority population for the four-county area plus Milwaukee County. As displayed, the vast majority of the region's minority population lives in Milwaukee County. As of 2010, 88.2% of the region's 490,582 minority residents lived in Milwaukee County and only 11.8% lived in the remaining 4 counties that comprise the HOME Consortium. Of the region's 256,407 African American residents, 97.0% lived in Milwaukee County as of 2010, and only 3% lived in the HOME Consortium counties. In comparison, 55.2% of the non-Hispanic White population lived in one of the four suburban counties and 44.8% lived in Milwaukee County in 2010.

The most recent Census data also reveals that the Milwaukee-Waukesha-West Allis MSA (which consists of Milwaukee, Waukesha, Washington, and Ozaukee Counties) has the lowest rate of black suburbanization of any large metro area in the U.S. Only 8.8% of the Milwaukee MSA's black population lived in the suburbs rather than the City of Milwaukee, in comparison to 79.5% of non-Hispanic Whites. Other highly segregated metros (including Buffalo, NY; New York, NY; Detroit, MI; and Chicago, IL) had black suburbanization rates that ranged from 29.4% to 46.7%, all well-above the 8.8% seen in the Milwaukee MSA.¹³

The segregation analysis provided in the next section will look at residential patterns in both the four-county HOME Consortium area and the region including Milwaukee County. Impediments identified in this analysis and related recommendations are intended to address fair housing choice for both existing residents of the Consortium counties and residents in the region (or elsewhere) who may consider moving to one of the Consortium counties.

¹³ Levine, Marc. (July 2013) "Perspectives on the Current State of the Milwaukee Economy." University of Wisconsin Center for Economic Development, p. 12. Accessed via <http://www4.uwm.edu/ced/publications/perspectives.pdf>.

Minority Share of the Population by Census Tract in the 4-County Study Area and Milwaukee County, 2010



Source: U.S. Census 2010 SF1 Table P5

National Origin

As of the 2008-2012 American Community Survey, 4.1% of the study area’s population was foreign born, considerably below the U.S. rate of 12.9%, but on par with that of Wisconsin (4.6%). Since the 2000 Census, the study area’s non-native population grew by 40.7%, surpassing the growth rate of both the state (36.5%) and country (27.9%).

While nearly half of the nation’s foreign born population is from the Caribbean and Central America, these regions make up only 22.7% of the study area’s non-US natives. The largest shares are from Asia (35.6%) and Europe (33.2%), and native Asians increased by 84.9% since 2000.

National Origin of Foreign Born Population in the 4-County Study Area					
National Origin	2000		2008-2012		Percent Change
	Count	Share	Count	Share	
Europe	8,620	43.1%	9,346	33.2%	8.4%
Asia	5,418	27.1%	10,019	35.6%	84.9%
Africa	392	2.0%	736	2.6%	87.8%
Oceania	165	0.8%	122	0.4%	-26.1%
Americas	5,395	27.0%	7,896	28.1%	46.4%
Caribbean & Central America	3,889	19.5%	6,380	22.7%	64.1%
South America	529	2.6%	534	1.9%	0.9%
North America	977	4.9%	982	3.5%	0.5%
Foreign Born Population	19,990	100.0%	28,119	100.0%	40.7%
Foreign Born Population as Share of Total	3.2%		4.1%		

Sources: U.S. Census 2000 SF3 Table PCT019 and 2008-2012 5-Year American Community Survey Table B05006

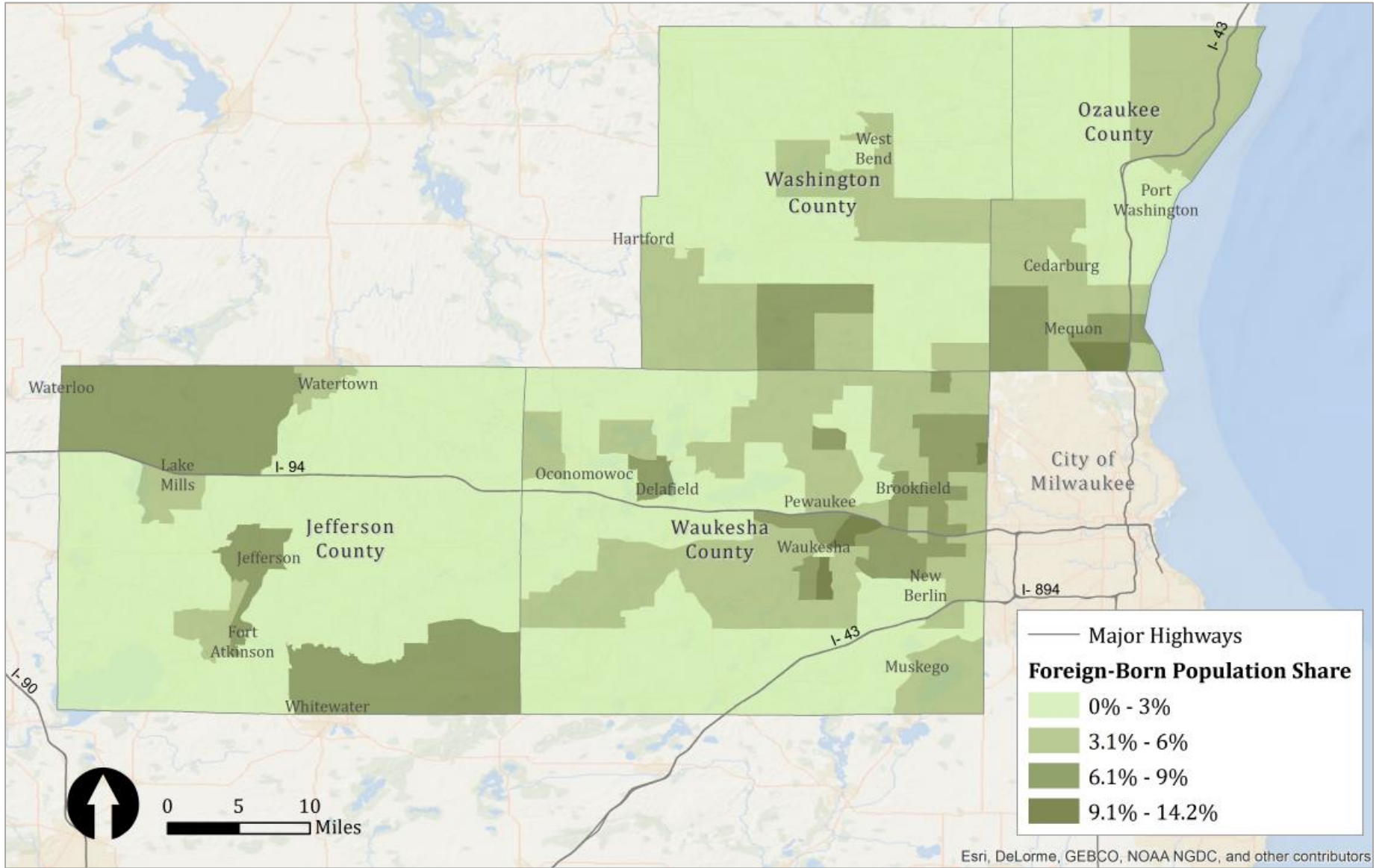
As the following table and map shows, pockets of foreign born populations are spread throughout the study area. Waukesha County has the highest share of non-natives (4.4%) and Washington County the lowest (2.8%). Asians and Europeans make up the largest share of non-natives in Waukesha, Washington, and Ozaukee Counties (74.2%, 69.8%, and 80.9%, respectively), and persons from the Caribbean and Central America make up the majority in Jefferson County (65.9%), reflecting its larger Hispanic population. As the map illustrates, the greatest concentrations (above 9.1%) of foreign born residents are in five census tracts in Waukesha, Butler, and Mequon.

National Origin of Foreign Born Population by County for the 4-County Study Area

Race by Ethnicity	2000		2008-2012		Percent Change	2000		2008-2012		Percent Change
	Count	Share	Count	Share		Count	Share	Count	Share	
	Waukesha County					Washington County				
Europe	5,483	42.1%	5,547	32.2%	1.2%	1,019	46.5%	1,557	42.0%	52.8%
Asia	3,988	30.6%	7,235	42.0%	81.4%	536	24.5%	1,030	27.8%	92.2%
Africa	193	1.5%	519	3.0%	168.9%	38	1.7%	4	0.1%	-89.5%
Oceania	109	0.8%	86	0.5%	-21.1%	6	0.3%	17	0.5%	183.3%
Americas	3,244	24.9%	3,839	22.3%	18.3%	591	27.0%	1,095	29.6%	85.3%
Caribbean & Central America	2,178	16.7%	2,881	16.7%	32.3%	382	17.4%	854	23.1%	123.6%
South America	374	2.9%	328	1.9%	-12.3%	70	3.2%	134	3.6%	91.4%
North America	692	5.3%	630	3.7%	-9.0%	139	6.3%	107	2.9%	-23.0%
Foreign Born Population	13,017	100.0%	17,226	100.0%	32.3%	2,190	100.0%	3,703	100.0%	69.1%
Foreign Born Pop as Share of Total	3.6%		4.4%			1.9%		2.8%		
	Ozaukee County					Jefferson County				
Europe	1,502	55.2%	1,608	44.4%	7.1%	616	29.8%	634	17.8%	2.9%
Asia	694	25.5%	1,323	36.5%	90.6%	200	9.7%	431	12.1%	115.5%
Africa	139	5.1%	177	4.9%	27.3%	22	1.1%	36	1.0%	63.6%
Oceania	32	1.2%	13	0.4%	-59.4%	18	0.9%	6	0.2%	-66.7%
Americas	352	12.9%	501	13.8%	42.3%	1,208	58.5%	2,461	69.0%	103.7%
Caribbean & Central America	208	7.6%	294	8.1%	41.3%	1,121	54.3%	2,351	65.9%	109.7%
South America	62	2.3%	40	1.1%	-35.5%	23	1.1%	32	0.9%	39.1%
North America	82	3.0%	167	4.6%	103.7%	64	3.1%	78	2.2%	21.9%
Foreign Born Population	2,719	100.0%	3,622	100.0%	33.2%	2,064	100.0%	3,568	100.0%	72.9%
Foreign Born Pop as Share of Total	3.3%		4.2%			2.8%		4.3%		

Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Foreign Born Share of the Population by Census Tract in 4-County Study Area, 2008-2012



Source: 2008-2012 5-Year American Community Survey Table B0500

Familial Status and Householder Sex

As of the 2010 Census, there were 270,613 households in the study area, of which 70.9% were families.¹⁴ Nearly half of families and one-third of total households (32.1%) included children. Only 10.3% of family households had female householders, compared to 55.2% of non-family households, together totaling 63,301 (or 23.4% of total householders). Nationally, two-thirds of households were family households (66.4%) in 2010, about one-third (31.3%) of all households had children, and 34.9% had female householders.

Familial Status and Sex of Householder in the 4-County Study Area					
Household Type	2000		2010		2000-2010 % Change
	Count	Share	Count	Share	
Family Households	176,167	74.0%	191,970	70.9%	9.0%
Married couple householders	152,527	64.1%	162,290	60.0%	6.4%
With related children under 18	72,087	30.3%	68,665	25.4%	-4.7%
No related children under 18	80,440	33.8%	93,625	34.6%	16.4%
Male householder, no wife	7,031	3.0%	9,786	3.6%	39.2%
With related children under 18	4,039	1.7%	5,751	2.1%	42.4%
No related children under 18	2,992	1.3%	4,035	1.5%	34.9%
Female householder, no husband	16,609	7.0%	19,894	7.4%	19.8%
With related children under 18	10,654	4.5%	12,418	4.6%	16.6%
No related children under 18	5,955	2.5%	7,476	2.8%	25.5%
Nonfamily Households	61,966	26.0%	78,643	29.1%	26.9%
Male householders	28,371	11.9%	35,236	13.0%	24.2%
Female householders	33,595	14.1%	43,407	16.0%	29.2%
Total Households	238,133	100.0%	270,613	100.0%	13.6%
Total female householders	50,204	21.1%	63,301	23.4%	26.1%
Total households with children	86,780	36.4%	86,834	32.1%	0.1%

Sources: U.S. Census 2000 SF1 Tables P027 and P035 and 2010 SF1 Tables P29 and P39

Changes in household types in the study area between 2000 and 2010 show a 4.7% drop in the number of married couple households with children. Numbers of other household types (single householders with and without children and nonfamily households), meanwhile, grew by rates ranging from 16.6% to 42.4%. These trends indicate growing diversity in terms of householders and family type in the study area.

¹⁴ The Census defines a family household as a household with two or more people (one of whom is the householder) related by birth, marriage, or adoption residing together. A family household also includes any unrelated people who may be residing with the family.

Looking at household type by county, shows that family households constitute around 70% of households in each (ranging from 68.1% in Jefferson County to 71.9% in Washington). All saw declines in the number of married couples with children, and substantial growth in single householder families and non-family households.

The share of female householders ranges from 22.2% in Washington County to 25.2% in Jefferson County. As the map of female householders shows, greatest concentrations are in eight tracts in Waukesha County, three tracts in Washington County, and one tract in Ozaukee County. Female householders make up 35.1% or more of households in each of these areas.

Households with children make up just under one-third of total households in each county, ranging from 31.2% in Ozaukee County to 32.9% in Washington County. Census tracts with the highest concentration of households with children (40.1% or more) are in Waukesha County (12 tracts), Ozaukee County (2 tracts), and Washington County (1 tract).

Familial Status and Sex of Householder by County for the 4-County Study Area

Household Type	2000		2010		Percent Change	2000		2010		Percent Change
	Count	Share	Count	Share		Count	Share	Count	Share	
	Waukesha County					Washington County				
Family Households	100,502	74.3%	108,810	71.3%	8.3%	32,757	74.7%	37,114	71.9%	13.3%
Married couple householders	87,606	64.8%	92,734	60.7%	5.9%	28,167	64.2%	31,191	60.4%	10.7%
With related children under 18	41,471	30.7%	39,453	25.8%	-4.9%	13,491	30.8%	13,229	25.6%	-1.9%
No related children under 18	46,135	34.1%	53,281	34.9%	15.5%	14,676	33.5%	17,962	34.8%	22.4%
Male householder, no wife	3,737	2.8%	5,191	3.4%	38.9%	1,447	3.3%	2,079	4.0%	43.7%
With related children under 18	2,082	1.5%	2,951	1.9%	41.7%	861	2.0%	1,245	2.4%	44.6%
No related children under 18	1,655	1.2%	2,240	1.5%	35.3%	586	1.3%	834	1.6%	42.3%
Female householder, no husband	9,159	6.8%	10,885	7.1%	18.8%	3,143	7.2%	3,844	7.4%	22.3%
With related children under 18	5,756	4.3%	6,611	4.3%	14.9%	2,072	4.7%	2,502	4.8%	20.8%
No related children under 18	3,403	2.5%	4,274	2.8%	25.6%	1,071	2.4%	1,342	2.6%	25.3%
Nonfamily Households	34,727	25.7%	43,853	28.7%	26.3%	11,085	25.3%	14,491	28.1%	30.7%
Male householders	15,643	11.6%	19,112	12.5%	22.2%	5,397	12.3%	6,886	13.3%	27.6%
Female householders	19,084	14.1%	24,741	16.2%	29.6%	5,688	13.0%	7,605	14.7%	33.7%
Total Households	135,229	100.0%	152,663	100.0%	12.9%	43,842	100.0%	51,605	100.0%	17.7%
Total female householders	28,243	20.9%	35,626	23.3%	26.1%	8,831	20.1%	11,449	22.2%	29.6%
Total households with children	49,309	36.5%	49,015	32.1%	-0.6%	16,424	37.5%	16,976	32.9%	3.4%

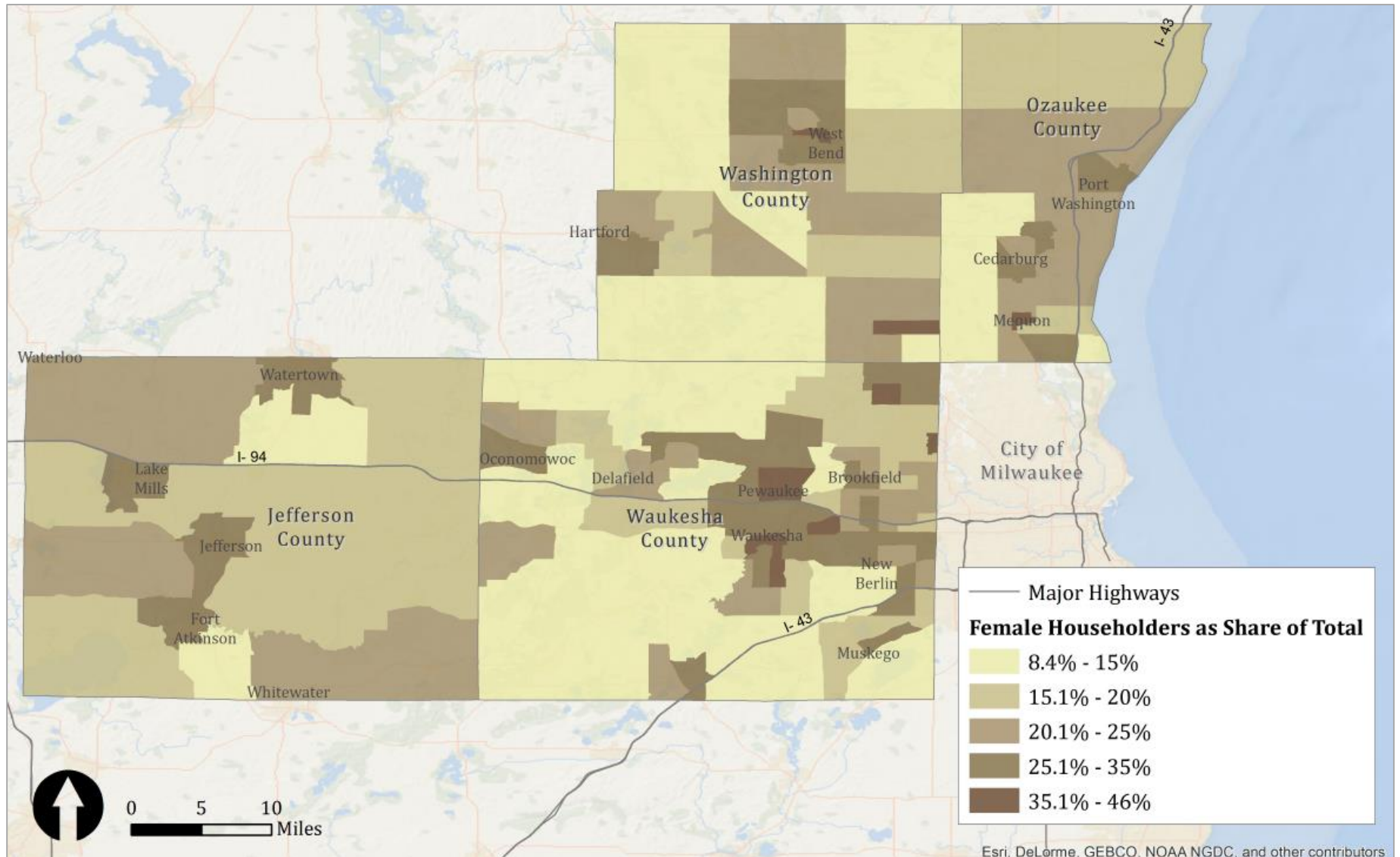
Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Familial Status and Sex of Householder by County for the 4-County Study Area (continued)

Household Type	2000		2010		Percent Change	2000		2010		Percent Change
	Count	Share	Count	Share		Count	Share	Count	Share	
	Ozaukee County					Jefferson County				
Family Households	23,014	74.6%	24,174	70.6%	5.0%	19,894	70.5%	21,872	68.1%	9.9%
Married couple householders	20,244	65.6%	20,759	60.6%	2.5%	16,510	58.5%	17,606	54.8%	6.6%
With related children under 18	9,626	31.2%	8,664	25.3%	-10.0%	7,499	26.6%	7,319	22.8%	-2.4%
No related children under 18	10,618	34.4%	12,095	35.3%	13.9%	9,011	31.9%	10,287	32.0%	14.2%
Male householder, no wife	776	2.5%	1,051	3.1%	35.4%	1,071	3.8%	1,465	4.6%	36.8%
With related children under 18	456	1.5%	601	1.8%	31.8%	640	2.3%	954	3.0%	49.1%
No related children under 18	320	1.0%	450	1.3%	40.6%	431	1.5%	511	1.6%	18.6%
Female householder, no husband	1,994	6.5%	2,364	6.9%	18.6%	2,313	8.2%	2,801	8.7%	21.1%
With related children under 18	1,270	4.1%	1,426	4.2%	12.3%	1,556	5.5%	1,879	5.9%	20.8%
No related children under 18	724	2.3%	938	2.7%	29.6%	757	2.7%	922	2.9%	21.8%
Nonfamily Households	7,843	25.4%	10,054	29.4%	28.2%	8,311	29.5%	10,245	31.9%	23.3%
Male householders	3,449	11.2%	4,282	12.5%	24.2%	3,882	13.8%	4,956	15.4%	27.7%
Female householders	4,394	14.2%	5,772	16.9%	31.4%	4,429	15.7%	5,289	16.5%	19.4%
Total Households	30,857	100.0%	34,228	100.0%	10.9%	28,205	100.0%	32,117	100.0%	13.9%
Total female householders	6,388	20.7%	8,136	23.8%	27.4%	6,742	23.9%	8,090	25.2%	20.0%
Total households with children	11,352	36.8%	10,691	31.2%	-5.8%	9,695	34.4%	10,152	31.6%	4.7%

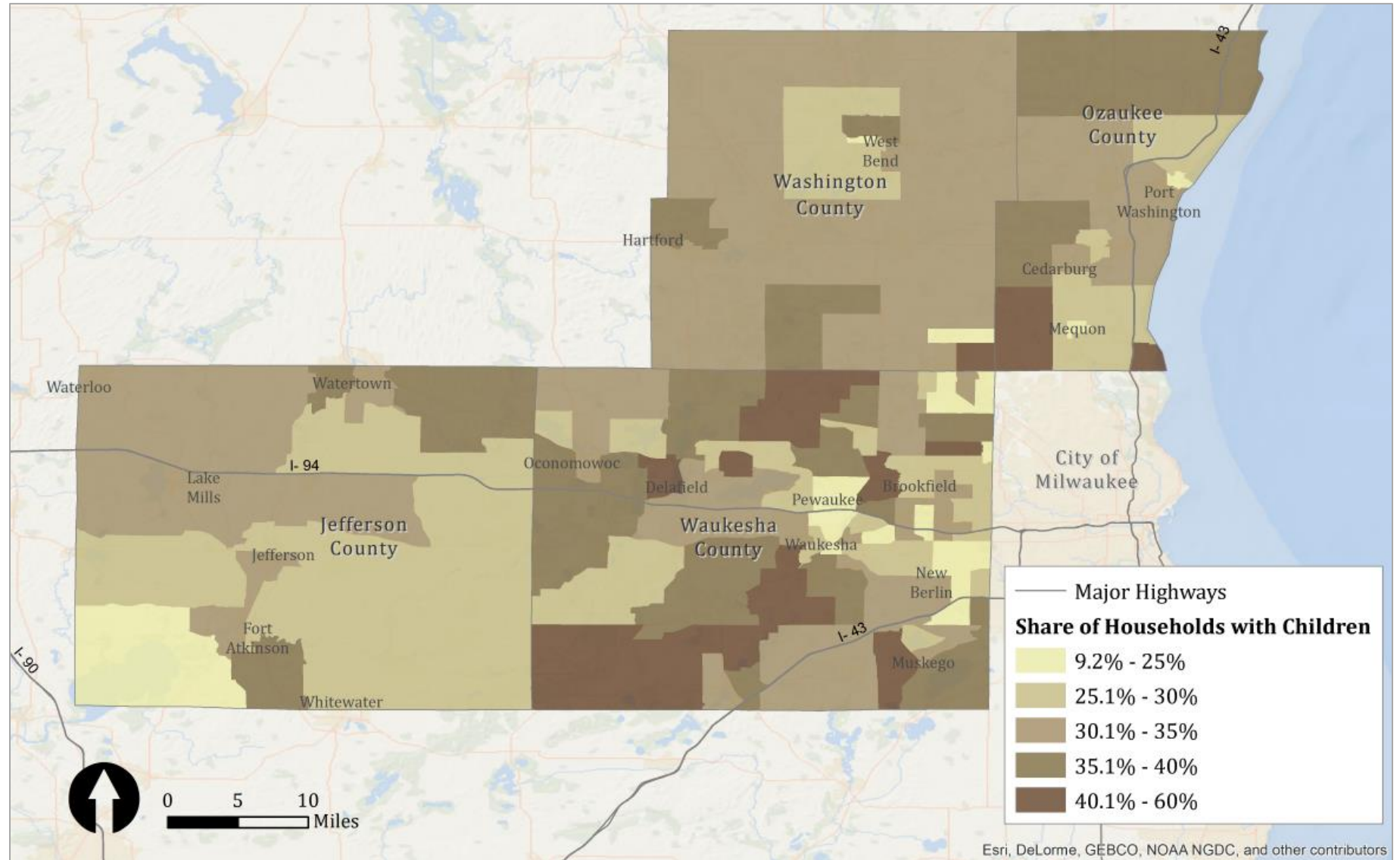
Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Share of Female Householders by Census Tract in the 4-County Study Area, 2010



Source: U.S. Census 2010 SF1 Tables P29 and P39

Share of Households with Children by Census Tract in the 4-County Study Area, 2010



Source: U.S. Census 2010 SF1 Table P39

Disability

Disability is defined by the Census Bureau as a lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

According to the most recent five-year American Community Survey data (2008-2012), the study area had a disability rate of 9.0%, which represented 61,948 persons living with a disability, including 32,975 persons under age 65 and 28,973 seniors (age 65 and over). The disability rate varied considerably based on age – 5.6% of persons under age 65 had a disability, compared to 30.3% age 65 and over.¹⁵

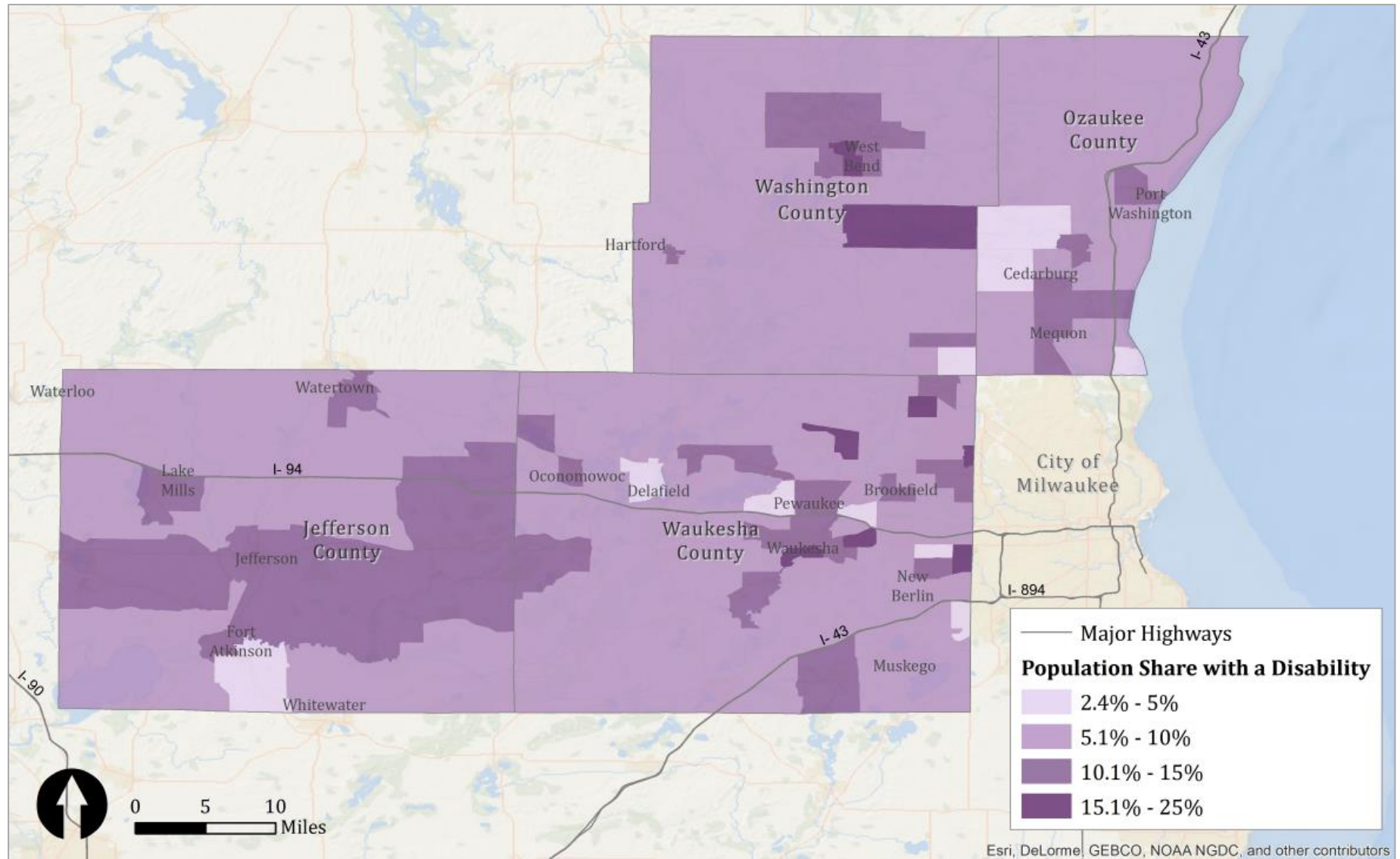
Looking at the data by county shows that disability rates are highest in Jefferson County (10.0% overall) and lowest in Ozaukee County (8.8% overall). The map on the next page shows the geographic distribution of the disabled population, which is over 15% in seven census tracts in Waukesha County and three in Washington County. The study area’s ability to meet the housing needs of its disabled residents is impacted by an array of factors – such as zoning regulations for group homes, the ease with which modifications may be made to existing homes, and the availability of fair housing services – which are each examined in other sections of this report.

Disability Status of the Population in the 4-County Study Area, 2008-2012						
Disability Status	Count	Share of Total	Count	Share of Total	Count	Share of Total
	Waukesha County		Washington County		4-County Area	
Total population	386,600	100.0%	130,916	100.0%	686,632	100.0%
With a disability	34,277	8.9%	11,852	9.1%	61,948	9.0%
Population under age 65	332,096	100.0%	113,642	100.0%	590,904	100.0%
With a disability	17,557	5.3%	6,676	5.9%	32,975	5.6%
Population age 65 and over	54,504	100.0%	17,274	100.0%	95,728	100.0%
With a disability	16,720	30.7%	5,176	30.0%	28,973	30.3%
	Ozaukee County		Jefferson County			
Total population	85,969	100.0%	83,147	100.0%		
With a disability	7,544	8.8%	8,275	10.0%		
Population under age 65	72,838	100.0%	72,328	100.0%		
With a disability	3,846	5.3%	4,896	6.8%		
Population age 65 and over	13,131	100.0%	10,819	100.0%		
With a disability	3,698	28.2%	3,379	31.2%		

Source: 2008-2012 American Community Survey Tables B18101

¹⁵ Disability rates from the 2000 Census are not provided here because questions regarding disability were changed in 2008 and, according to the Census Bureau, should not be compared with previous American Community Survey or Census disability data.

Share of Population with a Disability by Census Tract in 4-County Study Area, 2008-2012



Source: 2008-2012 American Community Survey Table B18101

Religious Affiliation

Religion is not one of the questions surveyed by the U.S. Census Bureau making dependable, comprehensive data on religious affiliation difficult to find. The data used in this report appears in the 2010 U.S. Religion Census: Religious Congregations & Membership Study, a county-by-county enumeration of religious bodies in the U.S. published by the Association of Statisticians of American Religious Bodies (ASARB). Data for the study area by county is provided below.

Population by Religious Affiliation in the 4-County Study Area, 2010						
Disability Status	Count	Share	Count	Share	Count	Share
	Waukesha County		Washington County		4-County Area	
Catholic	115,008	29.5%	39,943	30.3%	202,232	29.2%
Evangelical Protestant	71,237	18.3%	25,503	19.3%	133,125	19.2%
Mainline Protestant	38,654	9.9%	11,157	8.5%	72,130	10.4%
Orthodox	0	0.0%	28	0.0%	278	0.0%
Other	9,840	2.5%	532	0.4%	11,980	1.7%
Judaism	343	0.1%	35	0.0%	1,073	0.2%
Hinduism	6,026	1.5%	25	0.0%	6,128	0.9%
Other	3,471	0.9%	472	0.4%	4,779	0.7%
Unclaimed	155,152	39.8%	54,724	41.5%	272,114	39.3%
Total Population	389,891	100.0%	131,887	100.0%	691,859	100.0%
	Ozaukee County		Jefferson County			
Catholic	28,644	33.2%	18,637	22.3%		
Evangelical Protestant	14,469	16.7%	21,916	26.2%		
Mainline Protestant	10,289	11.9%	12,030	14.4%		
Orthodox	250	0.3%	0	0.0%		
Other	1,244	1.4%	364	0.4%		
Judaism	695	0.8%	0	0.0%		
Hinduism	77	0.1%	0	0.0%		
Other	472	0.5%	364	0.4%		
Unclaimed	31,499	36.5%	30,739	36.7%		
Total Population	86,395	100.0%	83,686	100.0%		

Source: Association of Statisticians of American Religious Bodies, *2010 U.S. Religion Census: Religious Congregations & Membership Study*

In the study area, 69.3% of the population adhered to a religion as of 2010.¹⁶ Of those claiming a religious affiliation, Catholics made up the largest share at 29.9% of the population. Nearly one-fifth (19.2%) of the population was Evangelical Protestant and 10.4% were Mainline Protestant. Catholicism had the most adherents in each county except Jefferson, where Evangelical Protestants constituted the largest share at 26.2%.

Summary of Findings

- As of 2010, the large majority of the four-county study area was non-Hispanic White (91.6%); Hispanic residents made up 3.9%, followed by Asians (2.0%) and African Americans (1.1%). Diversity increased since 2000 as the White population grew by only 5.2%, while the Black and Asian populations nearly doubled and the Hispanic population grew by 78.5%.
- African Americans do not make up more than 6% of any census tract; however, they are relatively concentrated in census tracts in Waukesha and just to its west, Menomonee Falls, and Mequon. The study area's Asian population is relatively most concentrated in Brookfield and Waukesha, where Asians make up more than 8% of three census tracts. Hispanic residents make up more than 15% of the population in four tracts in Waukesha and one in Fort Atkinson.
- Foreign born residents made up 4.1% of study area population in 2010, and more than 9% of the population in five census tracts in Waukesha, Butler, and Mequon. Asian and European immigrants made up the largest shares of the non-US native population in the study area at 35.6% and 33.2%, respectively.
- Nearly one-third (32.1%) of households in the study area had children as of 2010, down from 36.4% ten years earlier. The highest concentrations of households with children (40% or more of households) were in 15 tracts in Waukesha, Ozaukee, and Washington Counties.
- Female householders made up 23.4% of the study area, and over 35% of 12 tracts in Waukesha, Washington, and Ozaukee Counties. From 2000 to 2010, the number of female householders increased by 26.1% compared to 6.4% growth for married couple households.
- Persons with a disability constituted 9.0% of the study area population during the 2008-2012 American Community Survey period; of the disabled population, 53.2% were under age 65 and 46.8% were age 65 and over.
- As of 2010, 60.7% of study area residents adhered to a religion. Catholics made up 29.2% of the population, followed by Evangelical Protestants (19.2%) and Mainline Protestants (10.4%).

¹⁶ Congregational adherents include all full members, their children, and others who regularly attend services. "Unclaimed," are not adherents of any of the 236 groups included in the Religious Congregations & Membership Study, 2010.

Segregation Analysis

Segregation, or the degree to which two or more racial or ethnic groups live geographically separate from one another, can directly affect the quality of life in cities and neighborhoods. A study by the Federal Reserve Bank of Cleveland compared the economic growth of more than 100 areas in the U.S. between 1994 and 2004 and concluded that racial diversity and inclusion was “positively associated with a host of economic growth measures, including employment, output, productivity, and per capita income.”¹⁷ In general, diverse communities have been found to benefit from greater innovation arising out of the varied perspectives within the community. Additionally, multilingual and multicultural regions are best positioned for success in the global marketplace.

Despite the economic and other advantages of diversity, patterns of racial and ethnic segregation remain prevalent in many regions and cities. Segregation is typically perceived of negatively, but it is important to note that it is not always due to overt housing discrimination. In fact, there could be at least three reasons why patterns of segregation exist:

- personal preferences cause individuals to want to live in neighborhoods with others of a particular race and ethnicity;
- income differences across race and ethnic groups limit the selection of neighborhoods where persons of a particular race and ethnicity can live; and
- illegal discrimination in the housing market limits the selection of neighborhoods where persons of a particular race and ethnicity live.

Regardless of the causes of segregation, its effects can be detrimental. “Numerous studies have focused on the possible effects of residential neighborhoods on social and economic outcomes. Persistent economic and racial residential segregation is implicated in enduring racial and ethnic inequality.”¹⁸ For example, research demonstrates that African American homeowners earn less equity in their non-rental homes because their incomes are lower and they reside in areas that are more segregated. “Individuals take account of the race-ethnic composition of neighborhoods when deciding if and where to move. These patterns may result from a number of underlying social processes. While race-ethnic prejudice may govern residential choices to some degree, the ethnic composition of a neighborhood is also correlated with other factors that determine neighborhood attractiveness. For example, neighborhoods vary in levels of crime, quality housing, and poverty.”¹⁹

¹⁷ PolicyLink. 2011. “America’s Tomorrow: Equity is the Superior Growth Model.” http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406d-a6d5eca3bbf35af0%7D/SUMMIT_FRAMING_WEB_FINAL_20120127.PDF

¹⁸ Bruch, E. 2005. “Residential Mobility, Income, Inequality, and Race/Ethnic Segregation in Los Angeles.” Princeton, NJ: Princeton, University, pp. 1.

¹⁹ Bruch, 2005.

The task in this Segregation Analysis is to determine the degree to which residents of the study area are segregated by race and ethnicity, based on population counts from the 2000 and 2010 U.S. Censuses.

Residential segregation is the degree to which two or more racial or ethnic groups live geographically separate from one another. Early in the field of residential segregation analysis Duncan and Duncan²⁰ defined a “dissimilarity index” which became the standard segregation measure for evenness of the population distribution by race. By 1988 researchers had begun pointing out the shortcomings of dissimilarity indices when used apart from other measures of potential segregation. In a seminal paper, Massey and Denton²¹ drew careful distinctions between the related spatial concepts of sub-population distribution with respect to evenness (minorities may be under- or over-represented in some areas) and exposure (minorities may rarely share areas with majorities thus limiting their social interaction).

This analysis will use the methodology set forth by Duncan and Duncan for the measurement of evenness of the population distribution by race (dissimilarity index) as well as measures of exposure of one race to another (exposure and isolation indices), based on the work of Massey and Denton. Workers in the field generally agree that these measures adequately capture the degree of segregation. These measures have the advantage of frequent use in segregation analyses and are based on commonsense notions of the geographic separation of population groups. An additional analysis for the entropy index will provide a measure of multi-group diversity not accounted for by the other indices which necessarily are limited to two racial or ethnic groups at a time.

Dissimilarity Index

The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology requires a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas (census tracts in this analysis) have the same proportion of minority and majority members as the larger area in which they live (here, the four-county study area). Evenness is not measured in an absolute sense, but is scaled relative to some other group. The DI ranges from 0.0 (complete integration) to 1.00 (complete segregation). HUD identifies a DI value between 0.41 and 0.54 as a moderate level of segregation and 0.55 or above as a high level of segregation.

The regional proportion of the minority population can be small and still not be segregated if evenly spread among tracts. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI

²⁰ Duncan, Otis D., and Beverly Duncan. 1955. “A Methodological Analysis of Segregation Indices.” *American Sociological Review*, Vol. 20.

²¹ Massey, Douglas, S. and Denton, N. A., 1988. “The Dimensions of Residential Segregation.” *Social Forces*, Vol. 67, No. 2, University of North Carolina Press.

represents the proportion of minority members that would have to change their area of residence to achieve a distribution matching that of the majority (or vice versa).

Although the literature provides several similar equations for the calculation of the DI, the one below is the most commonly used. This equation differences the magnitude of the weighted deviation of each census tract’s minority share with the tract’s majority share which is then summed over all the tracts in the region:²²

$$D = \left(\frac{1}{2}\right) \sum_{i=1}^n \left| \frac{Min_i}{Min_T} - \frac{Maj_i}{Maj_T} \right|$$

where:

- D = Dissimilarity Index;
- Min_i = Minority group population of census tract i;
- Min_T = Minority group regional population;
- Maj_i = Majority group population of census tract i;
- Maj_T = Majority group regional population; and
- n = Total number of census tracts in the region.

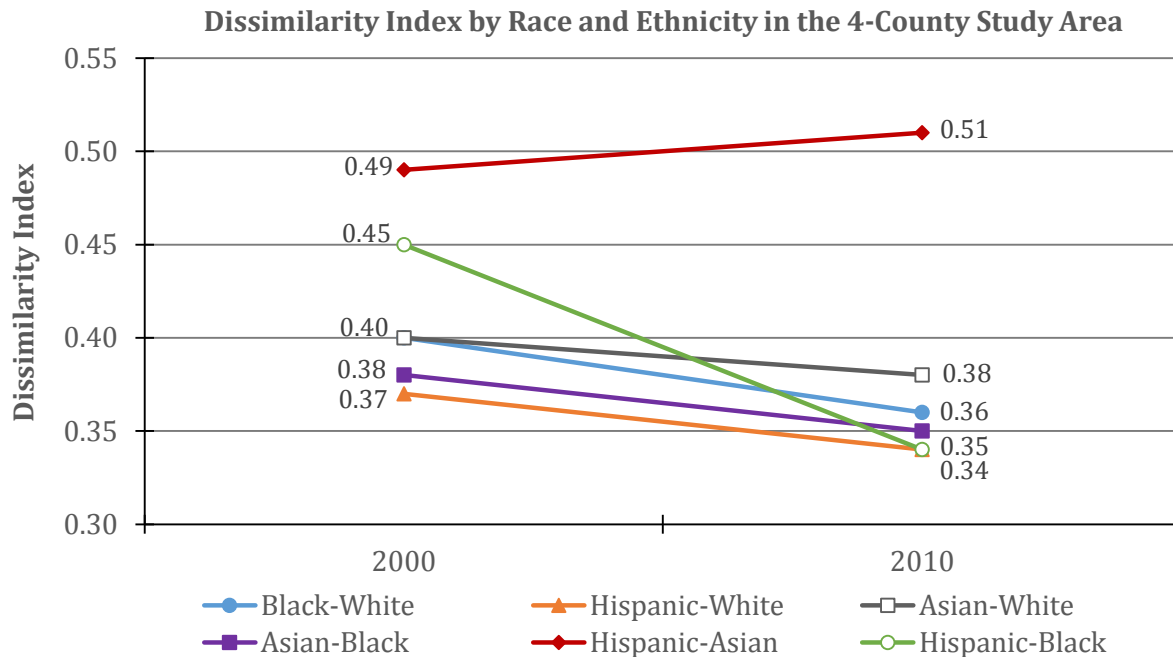
The table below presents the results of these calculations between non-Hispanic Whites, non-Hispanic Blacks, non-Hispanic Asians, and Hispanics in the study area.²³ The graph that follows presents the same data in a visual format so that trends can be more readily identified.

Dissimilarity Index for the 4-County Study Area			
Group Exposure	2000	2010	Change
Black-White	0.40	0.36	-0.04
Hispanic-White	0.37	0.34	-0.03
Asian-White	0.40	0.38	-0.02
Asian-Black	0.38	0.35	-0.03
Hispanic-Asian	0.49	0.51	0.02
Hispanic-Black	0.45	0.34	-0.11

Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

²² Calculation after Desegregation Court Cases and School Demographics Data, Brown University, Providence, Rhode Island. Source: <http://www.s4.brown.edu/schoolsegregation/desegregationdata.htm>. Accessed February 27, 2013.

²³ The DI methodology requires that each group be distinct from each other. Each racial or ethnic group cannot overlap. This study focuses primarily on four groups: Hispanics, non-Hispanic Whites, non-Hispanic Blacks, and non-Hispanic Asians (to be called “Whites,” “Blacks,” and “Asians” for simplicity).



Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Overall, the DI calculations show low levels of segregation between most racial and ethnic pairings in 2010. Black and White residents had a dissimilarity index of 0.36, down from 0.40 in 2000. This can be interpreted as meaning that 36% of Black residents *or* 36% of White residents would have to move census tracts in order for the two groups to be identically distributed geographically and thus eliminate segregation within the study area.

Hispanics and Whites and Asians and Whites also showed low levels of segregation with 2010 DIs of 0.34 and 0.38, respectively; further, segregation among both these pairs declined since 2000. One racial/ethnic pairing – Hispanics and Asians – showed a moderate level of segregation (DI = 0.51) and an increase in dissimilarity since 2000. This value indicates that of all the groups compared, Hispanics and Asians are least likely to reside in similar study area census tracts. For each of the remaining pairings, segregation was low and declined from 2000 to 2010.

These findings are not surprising given the low level of diversity in the study area. They show that the small share of minority residents tend to have relatively similar geographic distributions as White residents; however, low dissimilarity indices do not imply that minority and majority populations necessarily interact frequently with one another, as the proceeding analyses will show.

Regional Segregation Patterns

Residential patterns in the study area are part of a larger regional picture for metro Milwaukee. While segregation is low within the four-county area, the Milwaukee-Waukesha-West Allis MSA has the 2nd highest dissimilarity index for Black and White residents in the nation at 0.796, down only

0.026 from 0.822 in 2000. This figure means that in order for the distribution of the White and Black populations in the MSA, either 79.6% of African American or 79.6% of White residents would need to move to a different census tract. The region also has a high level of segregation between Hispanic and White residents, with a 2010 dissimilarity index of 0.570, the 13th highest for U.S. metro areas. Like Black/White segregation, there has been little change in the dissimilarity levels between Hispanics and Whites in Milwaukee since 2000, with the index falling by only 0.025 by 2010.²⁴ Low levels of diversity in Waukesha, Washington, Jefferson, and Ozaukee Counties continue to contribute to persistent segregation region-wide, and any impediments in the four-county area that limit housing choice or inhibit housing options for protected classes must be addressed to improve conditions both locally and regionally.

Exposure Index

Two basic, and related, measures of racial and ethnic interaction are exposure (this section) and isolation (next section). These two indices, respectively, reflect the possibility that a minority person shares a census tract with a majority person (Exposure Index, EI, this section) or with another minority person (Isolation Index, II, next section).

“Exposure measures the degree of potential contact between minority and majority group members.”²⁵ Exposure is a measure of the extent two groups share common residential areas and so it reflects the degree to which the average minority group member experiences segregation. The EI can be interpreted as the probability that a minority resident will come in contact with a majority resident, and ranges in value from 0.0 to 1.0, where higher values represent lower segregation.

As with the Dissimilarity Index, each calculation of EI involves two mutually exclusive racial or ethnic groups. The EI measures the exposure of minority group members to members of the majority group as the minority-weighted average (the first term in the equation below) of the majority proportion (the second term) of the population in each census tract, which can be written as:

$$Prob = \sum_{i=1}^n \left(\frac{Min_i}{Min_T} \right) \left(\frac{Maj_i}{Tot_i} \right)$$

where:

Prob = Probability that minority group members interact with majority group members

Min_i = Minority group population of census tract i;

Min_T = Minority group regional population;

Maj_i = Majority group population of census tract i;

²⁴ “Data: Residential Segregation.” *US2010: Discover America in a New Century*. American Communities Project: Brown University. <http://www.s4.brown.edu/us2010/SegSorting/Default.aspx>

²⁵ Massey and Denton, 1988.

Tot_i = Total population of census tract i ; and

n = Total number of census tracts in the region.

The EI is not “symmetrical” so the probability of a typical Black person meeting a White person in a tract is not the same as the probability of a typical White person meeting a Black person in that tract. An illustrative example of this asymmetry is to imagine a census tract with many White residents and a single Black resident. The Black person would see all White people, but the White residents would see only one Black person. Each would see a much different world with respect to group identification.

The maximum value of the EI depends both on the distribution of racial and ethnic groups and on the proportion of minorities in the area studied. Generally, the value of this index will be highest when the two groups have equal numbers and are spread evenly among tracts (low segregation). If a minority is a small proportion of a region’s population, that group tends to experience high levels of exposure to the majority regardless of the level of evenness.²⁶

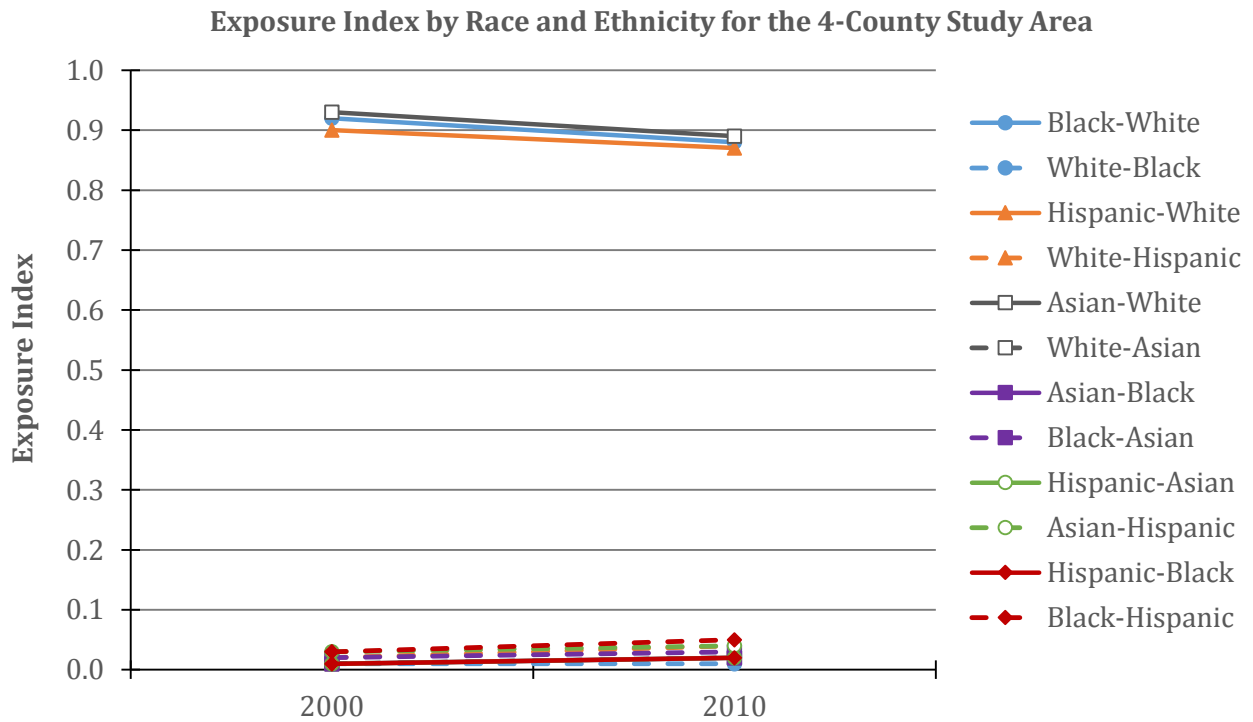
The “Exposure Index” table shows that in 2010 the typical probability of a Black person interacting with a White person within their census tract was 88%, while the probability of a White person interacting with a Black person was drastically lower at 1%. These rates can also be interpreted to mean that on average 88 of every 100 people a Black person meets within his census tract is White, but only 1 of every 100 people a White person meets is Black. Asians and Hispanics had similar likelihoods of interacting with Whites (87% and 89%, respectively), although Whites exposure to both of them remained very low (4% and 2%). Interaction amongst minority residents is also low, ranging from 0.02 to 0.05, due in part to their low shares of the total population.

The “Exposure Index by Race and Ethnicity” graph shows three downward sloping lines indicating a decline in exposure of all three minority groups (Blacks, Asians, and Hispanics) to Whites. In the remaining nine pairings, exposure levels increased slightly (by 0.02 or less in every case). These changes indicate that as diversity increases, the chances of minority residents being exposed to one another and Whites being exposed to minority residents increases, while minority exposure to Whites decreases correspondingly.

²⁶ John Iceland, Weinberg D.H., and Steinmetz, E. 2002. “Racial and Ethnic Residential Segregation in the United States: 1980-2000.” U.S. Census Bureau. Paper presented at the annual meetings of the Population Association of America, Atlanta, Georgia.

Exposure Index in the 4-County Study Area			
Interacting Groups	2000	2010	Change
Black-White	0.92	0.88	-0.04
White-Black	0.01	0.01	0.00
Hispanic-White	0.90	0.87	-0.03
White-Hispanic	0.02	0.04	0.02
Asian-White	0.93	0.89	-0.04
White-Asian	0.01	0.02	0.01
Asian-Black	0.01	0.02	0.01
Black-Asian	0.02	0.03	0.01
Hispanic-Asian	0.01	0.02	0.01
Asian-Hispanic	0.03	0.04	0.01
Hispanic-Black	0.01	0.02	0.01
Black-Hispanic	0.03	0.05	0.02

Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5



Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Regional Segregation Patterns

The US2010 project conducted at Brown University provides exposure index values for all U.S. metro areas using 2000 and 2010 Census data. According to that analysis, the Milwaukee-Waukesha-West Allis MSA ranked 371 out of 384 metro areas in terms of the level of exposure of Black residents to Whites (EI = 0.234 in 2010 and EI = 0.245 in 2000), and 191 in terms of level of exposure of White residents to Blacks (EI = 0.059 in 2010 and EI = 0.053 in 2000).²⁷ These figures indicate that Black residents are much less likely to interact with Whites in the Milwaukee region than are Black residents of most other MSAs in the country. This is not surprising given that the vast majority of Black residents live in Milwaukee County, while only about half of White residents do. In contrast, Black residents in suburban Milwaukee (i.e., the HOME Consortium counties) have high levels of exposure to Whites due to the low number of African American residents living there.

Looking at interaction between Hispanics and Whites, the Milwaukee MSA ranked 306 in terms of Hispanic exposure to Whites (EI = 0.462 in 2010 and EI = 0.505 in 2000) and 179 for White exposure to Hispanics (EI = 0.064 in 2010 and EI = 0.043 in 2000).²⁸

Isolation Index

The Isolation Index (II) measures “the extent to which minority members are exposed only to one another” (Massey and Denton, p. 288). Not a measure of segregation in a strict sense, the II is a measure of the probability that a member of one group will meet or interact with a member of the same group. The II can be viewed more as a measure of sociological isolation.

A simple change in notation from the Exposure Index equation yields the formula for the Isolation Index given below. This measure is calculated for one racial or ethnic group at a time so unlike the DI or EI, it does not compare the distribution of two groups. Instead, each calculation measures the isolation of a single group.

Similar to the EI, this index describes the average neighborhood for racial and ethnic groups. It differs in that it measures social interaction with persons of the same group instead of other groups. The II is the minority weighted average (the first term of the equation) of each tract’s minority population (the second term) and can be defined as:

$$Prob = \sum_{i=1}^n \left(\frac{Min_i}{Min_T} \right) \left(\frac{Min_i}{Tot_i} \right)$$

where:

Prob = Probability that minority group members share an area with each other;

Min_i = Minority group population of census tract i;

²⁷ “Data: Residential Segregation.” *US2010: Discover America in a New Century*.

²⁸ “Data: Residential Segregation.” *US2010: Discover America in a New Century*.

Min_T = Minority group regional population;
 Tot_i = Total population of census tract i ; and
 n = Total number of census tracts in the region.

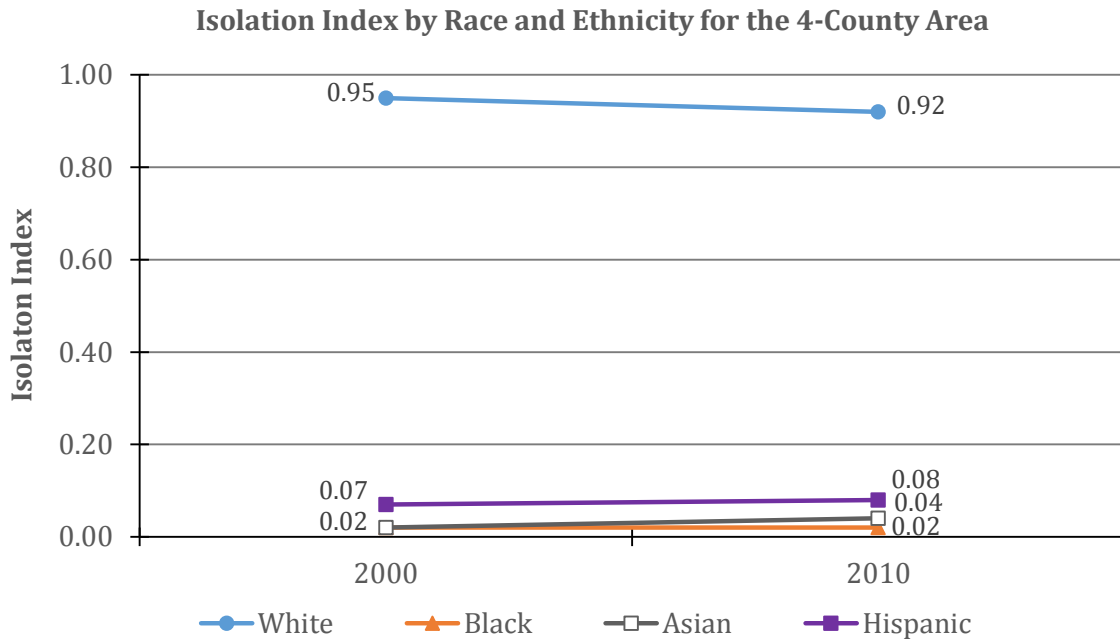
The II is a region-level measure for each race/ethnicity summed up from tracts within the region. The II can be interpreted as a probability that has a lower bound of 0.0 (low segregation corresponding to a small dispersed group) to 1.0 (high segregation implying that group members are entirely isolated from other groups).

The Isolation Index values for the study area show Whites to be by far the most isolated, in effect segregated, from other racial and ethnic groups. In 2010, the average White resident lived in a tract that was 92% White, down from an average of 95% in 2000. Isolation was lower for minority populations – the average Black resident lived in a tract that was only 2% Black, the average Asian resident in a tract that was 4% Asian, and the average Hispanic in a 1% Hispanic tract.²⁹ IIs for the latter two population segments are up since 2000, while the II for Black residents remained constant.

Isolation Index in the 4-County Study Area			
Group	2000	2010	Change
White	0.95	0.92	-0.03
Black	0.02	0.02	0.00
Asian	0.02	0.04	0.02
Hispanic	0.07	0.08	0.01

Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

²⁹ The Exposure and Isolation Index methodologies implicitly assumes that the tract populations are evenly distributed within a census tract so that the frequency of social interactions is based on the relative population counts by tract for each race or ethnicity. Within actual neighborhoods racial and ethnic groups are not homogenous (e.g., families or small area enclaves) so that the chances of one group meeting another of the same group may be different than an even distribution might imply.



Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Regional Segregation Patterns

As of 2010, Isolation Index values in the Waukesha MSA were 0.838 for Whites (rank of 148 out of 384 metro areas), 0.655 for Blacks (rank of 8), 0.375 for Hispanics (rank of 60), and 0.068 (rank of 110) for Asians. These figures indicate that African American residents of the region are considerably isolated from other racial and ethnic groups, with the majority residing within the City of Milwaukee as the map on page 38 shows.³⁰

Entropy Index

Entropy, a mathematical concept based on the spatial evenness of the distribution of population groups, can be used to calculate diversity among racial and ethnic groups in a geographical area.³¹ Both the Dissimilarity Index and Exposure Index can only measure the segregation of two groups relative to each other, but the Entropy Index has the advantage of being able to measure the spatial distribution of multiple racial and ethnic groups simultaneously.

³⁰ "Data: Residential Segregation." *US2010: Discover America in a New Century*.

³¹ Iceland, John. 2004. "The Multigroup Entropy Index (Also Known as Theil's H or the Information Theory Index)." University of Maryland.

The Entropy Score (h) for a census tract is given by:

$$h_i = - \sum_{j=1}^k p_{ij} \ln(p_{ij})$$

where:

k = Number of groups;

p_{ij} = Proportion of population of j^{th} group in census tract i ($= n_{ij}/n_i$);

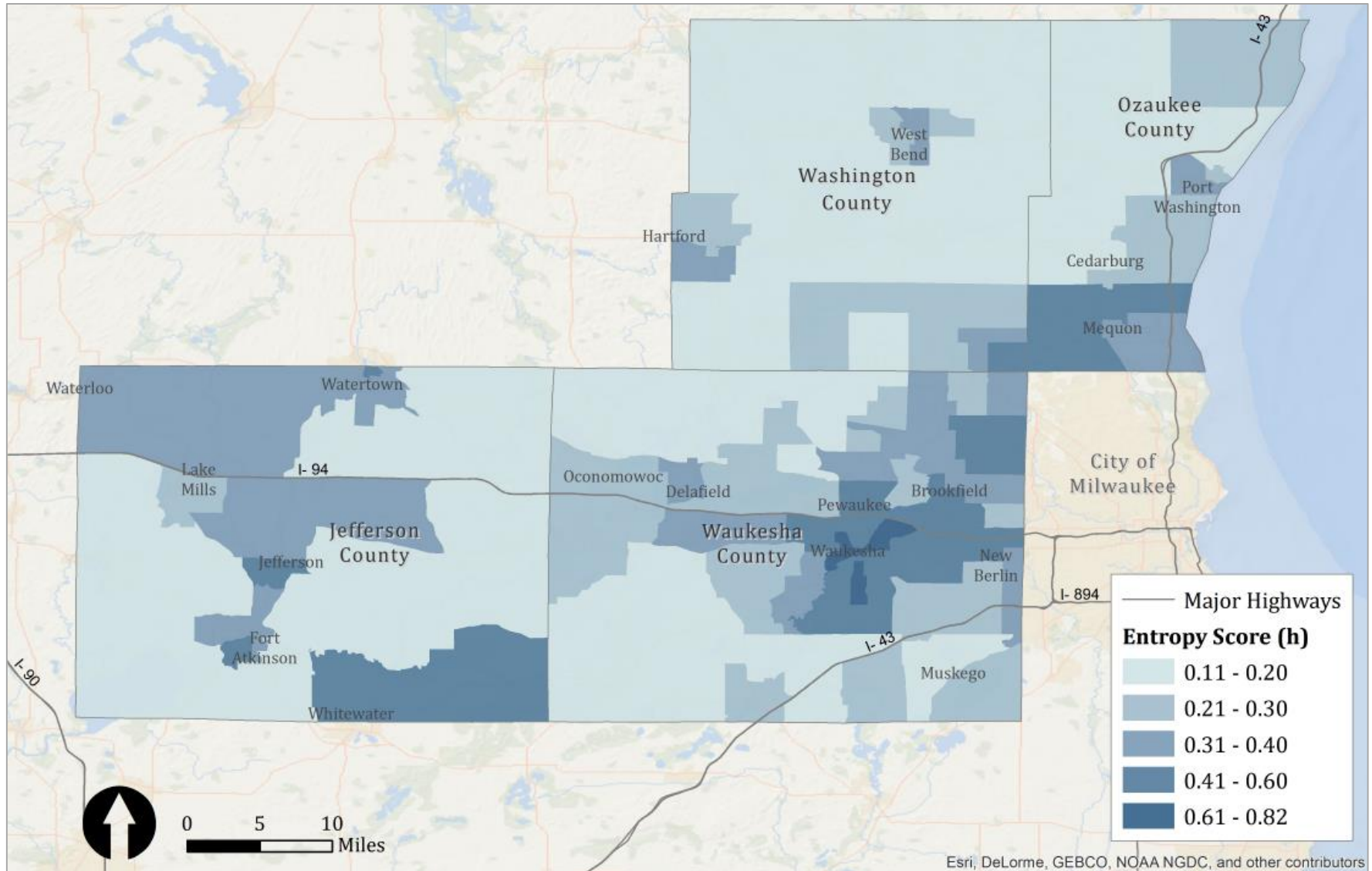
n_{ij} = Number of population of j^{th} group in tract i; and

n_i = Total population in tract i.

The higher the calculated value for h, the more racially and/or ethnically diverse the tract. The maximum possible level of entropy is given by the natural logarithm (ln) of the number of groups used in the calculations. The maximum score occurs when all groups have equal representation in the geographic area. In this case $k = 4$ (non-Hispanic Whites, non-Hispanic Blacks, other non-Hispanic populations, and Hispanics) so the maximum value for h is $\ln(4) = 1.39$. A tract with $h = 1.39$ would have equal proportions of all groups (high diversity) and a tract with $h = 0.0$ would contain only a single group (low diversity).

The Diversity Index map below shows the results of the tract-level calculations of the Entropy Score as a measure of diversity in the study area in 2010. Visually, it can be seen that most tracts have low levels of diversity. Of the 153 study area tracts, 90.8% have h scores below 0.5; no tract has an h scores above 0.81. The study area's six most diverse tracts are located in the City of Waukesha, and each has an h score above 0.60. Other areas of relatively higher levels of diversity include the Cities of Jefferson and Fort Atkinson, southeast Jefferson County, and southern Ozaukee County. Diversity was low in most parts of Washington County and in rural areas of Jefferson, Waukesha, and Ozaukee Counties, where most tracts have entropy scores of 0.20 or below.

Diversity Index by Census Tract in the 4-County Study Area, 2010



Source: U.S. Census 2010 SF1 Table P5

The Entropy Score is not a true measure of segregation because it does not assess the distribution of racial and ethnic groups across a region. A region can be very diverse if all minority groups are present but also highly segregated if all groups live entirely in their own neighborhoods (or census tracts). However, Entropy Scores, measures of tract-level diversity, can be used to calculate the Entropy Index³² (EI) which measures the distribution of multi-group diversity across tracts and an entire region.

The EI measures unevenness in the distribution of multiple racial and ethnic groups in a region by calculating the difference in entropy between census tracts and the larger region as a whole. The Entropy Index (H) for a region is the weighted average variation of each tract’s entropy score differenced with the region-wide entropy as a fraction of the region’s total entropy (Iceland 2004):

where:

$$H = \frac{\hat{H} - \bar{H}}{\hat{H}}$$

\hat{H} = Entropy for the region’s tracts as a whole;

\bar{H} = Average of the individual census tracts’ values of h weighted by the population; and

H = Entropy Index for the region.

The EI ranges between H = 0.0 when all tracts have the same composition as the entire region (minimum segregation) to a maximum of H = 1.0 when all tracts contain one group only (maximum segregation).³³ Regions with higher values of H have less uniform racial distributions and regions with lower values of H have more uniform racial distributions.

The table below gives the result of an entropy calculation for the study area as a whole. In both 2000 and 2010 the entropy index was very low (0.09 and 0.08, respectively), indicating that levels of diversity vary little throughout the region. On average, diversity at the tract level very closely matches diversity for the entire study area.

Entropy Index for the 4-County Study Area		
2000	2010	Change
0.09	0.08	-0.01

Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

³² Iceland, John. 2002. “Beyond Black and White: Metropolitan Residential Segregation in Multi-Ethnic America,” U.S. Census Bureau, Housing and Household Economic Statistics Division, paper presented at the American Sociological Association meetings, Chicago, Illinois.

³³ White, Michael J. 1986. “Predicted Ethnic Diversity Measures for 318 U.S. Metropolitan Areas by Census Region, 1980.” *Population Index*, Vol. 52.

Stakeholder Input

Most stakeholders reported segregation being a result of either income or ethnic and racial minority groups who wished to remain in regions close to other family. Most stakeholders reported a lack of awareness of housing discrimination that would result in racial segregation of communities and, within Waukesha County, described neighborhoods that were racially mixed and diverse. Racialized segregation was reported as due more to the likelihood that residents from ethnic and racial groups were more likely to have lower wages or be low income. Interviewees generally reported good upkeep of public facilities, road ways ,and street lights, in areas where racial and ethnic minorities made up the majority of residents, but reported that the housing stock was older and in need of repairs. Very-low income residents of all racial groups, were reported to live in substandard housing units. Washington, Ozaukee, and Jefferson county stakeholders reported extremely low numbers of ethnically diverse residents that made it difficult to access segregation and housing discrimination.

Reconciliation of the Four Segregation Indices

One important question concerns whether or not the overall racial and ethnic segregation in the four-county area has worsened, improved, or remained about the same between 2000 and 2010. The methodologies used in this analysis indicate low levels of segregation among minority and White residents, but a high level of isolation for Whites with very limited levels of exposure to minority populations. While slight improvements have occurred since 2000, diversity throughout the region remains low: Whites have a low likelihood of interacting with minority residents, and minorities have a low likelihood of interacting with one another.

Housing Profile

The section provides a snapshot of current housing conditions within the four-county study area, including the age of the housing stock, home values, housing problems, and housing cost burdens.

Characteristics of the Housing Stock

According to 2008-2012 ACS estimates, Waukesha County contained a total of 160,639 housing units, Washington County had 54,703 units, Ozaukee County had 36,252 units, and Jefferson County had 35,079 units of housing. Single-family detached units were the most common housing type in each of the four counties: 70.3% of the units in Waukesha County, 69.2% in Ozaukee County, 68.2% in Washington County, and 68.5% in Jefferson County. Multifamily housing consisting of five or more units comprised 16.9% of the housing stock in Waukesha County, 14.3% of the housing stock in Ozaukee County, 13.7% of the housing stock in Washington County, and 11.1% of housing stock in Jefferson County.

Housing Unit Overview by County, 2008-2012								
Subject	Waukesha County		Jefferson County		Washington County		Ozaukee County	
	Count	%	Count	%	Count	%	Count	%
Number of Units	160,639	--	35,079	--	54,703	--	36,252	--
1-Unit, Detached	112,979	70.3%	24,027	68.5%	37,652	68.8%	25,103	69.2%
1-Unit, Attached	10,617	6.6%	1,879	5.4%	4,622	8.4%	3,149	8.7%
2 Units	4,123	2.6%	1,661	4.7%	2,274	4.2%	1,660	4.6%
3 or 4 Units	5,065	3.2%	1,875	5.3%	1,841	3.4%	1,027	2.8%
5 to 9 Units	8,619	5.4%	1,725	4.9%	2,923	5.3%	2,527	7.0%
10 to 19 Units	5,241	3.3%	816	2.3%	1,962	3.6%	1,152	3.2%
20 or More Units	13,191	8.2%	1,385	3.9%	2,647	4.8%	1,504	4.1%
Mobile Home	804	0.5%	1,711	4.9%	767	1.4%	120	0.3%
Boat, RV, Van, etc.	0	0.0%	0	0.0%	15	0.0%	10	0.0%
Owner-Occupied Units	117,369	76.7%	23,205	71.7%	40,476	78.0%	26,808	78.6%
% Vacant Owner Units	1.5%	--	--	1.3%	--	--	1.4%	--
Renter-Occupied Units	35,626	23.2%	9,155	28.3%	11,405	22.0%	7,285	21.4%
% Vacant Renter Units	4.0%	--	--	7.7%	--	--	7.7%	--

Source: 2008-2012 American Community Survey Table DP04

It is important to note that demographic trends impacting the four-county study area include an aging population, increased immigrant and racial and ethnic populations, and increasing numbers of millennial workers. These changing aspects are expected to increase demand for multifamily housing units, rental units, and units with accessibility for disabled residents. Mobile homes were significantly more common in Jefferson County representing 4.9% of housing stock. Mobile homes

represented 1.4% of the housing stock in Washington County, and nominal amounts of housing stock in both Waukesha County (0.5%) and Ozaukee County (0.3%).

Homeownership rates were over 70% in each of the counties, ranging from 71.7% in Jefferson County to 78.6% in Ozaukee County. Vacancy rates for owned housing were low (less than 2%) in Waukesha, Jefferson, and Ozaukee Counties. The rental vacancy rate was higher, ranging from 4.0% in Waukesha County to 7.7% in both Jefferson and Ozaukee Counties.

Age of Housing Stock

The age of an area’s housing stock typically has a substantial impact on the overall housing conditions in a community. The time period in which housing was built can be indicative of when repairs, rehabilitation, and revitalization projects for buildings will be required. Post World War II housing units typically has a life cycle of 20-30 years before repairs are needed. As housing ages, maintenance costs rise, which can present significant housing affordability issues for low-income and moderate-income homeowners. Additionally, the age of housing stock also indicates the likelihood that the housing is accessible to people with disabilities, and, by extension, that housing choice is truly available.

Age of Housing Stock by County, 2008-2012				
Year Built	Waukesha County	Jefferson County	Ozaukee County	Washington County
2010 or later	0.7%	0.6%	0.4%	0.8%
2000-2009	13.5%	13.0%	12.9%	16.7%
1990-1999	19.5%	15.2%	15.9%	21.1%
1980-1989	11.2%	7.5%	12.1%	11.1%
1970-1979	18.5%	12.6%	18.0%	17.6%
1960-1969	11.5%	10.3%	12.5%	8.2%
1950-1959	12.3%	9.3%	11.9%	6.4%
1940-1949	4.0%	5.1%	3.6%	4.1%
1939 or earlier	8.8%	26.4%	12.6%	14.0%

Source: 2008-2012 American Community Survey

Jefferson County has the oldest housing stock, indicating an increased likelihood of needs for repairs, rehabilitation, and making units compliant with ADA disability requirements. In Jefferson County, 40.8% of the housing stock was built in 1959 or earlier. Each of the other counties also had a large percentage of housing stock built before 1960: 28.1% of units in Ozaukee County, 24.5% in Washington County, and 24.3% in Waukesha County. Each of the four counties has less than 1% of housing stock built in 2010 or later.

Home Values

Home values, as reported in the 2008-2012 ACS estimates, reflect significant variance across the study area. The highest median home value was found in Waukesha County (\$244,000) followed by Ozaukee County (\$241,700), Washington County (\$212,000), and Jefferson County (\$183,000).

Median Home Value by County, 2008-2012			
Waukesha County	Jefferson County	Ozaukee County	Washington County
\$244,100	\$183,000	\$241,700	\$212,000

Source: 2008-2012 American Community Survey

Because home value data in the American Community Survey is self-reported by respondents, it is not always the most reliable source for this information. As a secondary source, the website Trulia.com, was used to determine median listing prices for the counties in the Consortium for the week ending August 21, 2014. The median sales prices were \$215,000 in Waukesha County, \$157,200 in Jefferson County, \$237,900 in Ozaukee County, and \$202,000 in Washington County indicating that housing prices are strong, but still recovering from the 2007-2009 recession.

Neither the data from the American Community Survey or Trulia are solely definitive. However, combined they illustrate a general pattern of pricing and home values. Further, stakeholder input in each county indicated that rising housing costs are not affordable based on average and median worker wages, which will be discussed further in this section.

Housing Problems

An examination of certain housing problems, such as foreclosure rates, substandard housing conditions, overcrowding, and cost burdens are useful in determining varying needs related to housing assistance. Data on substandard housing units with incomplete plumbing or kitchen facilities, overcrowding, and the cost burden for housing in relation to monthly income is available from HUD's Comprehensive Housing Affordability Strategy (CHAS) data. The CHAS dataset is a custom tabulation of American Community Survey data provided to HUD for the purposes of housing and community development planning.

According to CHAS data documentation, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Similarly, housing units lacking a sink with running water, a range, or a refrigerator are described as having incomplete kitchen facilities. Overcrowding occurs when a housing unit has more than one, but less than 1.5 people per room; severe overcrowding is defined as 1.5 or more people per room.

Housing Problems: Substandard Conditions and Overcrowding by County								
Housing Problem	Waukesha		Jefferson		Washington		Ozaukee	
	Count	%	Count	%	Count	%	Count	%
Total Occupied Units	152,995	--	31,925	--	51,881	--	34,093	--
Substandard Conditions								
Lacking complete plumbing facilities	299	0.2%	52	0.2%	152	0.3%	91	0.3%
Lacking complete kitchen facilities	724	0.5%	249	0.8%	249	0.5%	145	0.4%
Overcrowding								
1.00 or fewer per room (no overcrowding)	151,703	99.2%	31,577	98.9%	51,881	99.3%	33,935	99.5%
1.01 to 1.50 per room (overcrowded)	876	0.6%	220	0.7%	306	0.6%	102	0.3%
1.51 or more per room (severe overcrowding)	416	0.3%	128	0.4%	70	0.1%	56	0.2%

Source: 2008-2012 American Community Survey Table DP04

A cost burden occurs when a household has gross housing costs that range from 30% to 49.9% of overall household income; *severe* cost burden occurs when gross housing costs represent 50% or more of overall household income. For homeowners, gross housing costs include property taxes, home and mortgage insurance, association fees (i.e. home owner's association, condo, and mobile home fees) and utilities, such as, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this threshold represents monthly rent plus utility charges, but does not include the costs of home maintenance, as this expense should be incurred by landlords. It should be noted that given the varied age of housing stock throughout the four-county area, home maintenance and repair costs associated with older construction may add significant housing costs that are not included in calculations of cost burden.

Household Cost Burden by County								
Cost Burden	Waukesha		Jefferson		Washington		Ozaukee	
	Owners	Renters	Owners	Renters	Owners	Renters	Owners	Renters
30% or less	88,060	20,140	16,265	5,400	29,490	6,900	20,120	4,570
Over 30% to 50%	18,955	7,360	4,480	1,765	7,475	2,270	4,210	1,680
Over 50%	10,020	6,917	2,170	1,564	3,450	2,135	2,025	1,305
Data not available	345	375	150	130	80	70	100	40
Total	117,390	34,790	23,070	8,865	40,490	11,375	26,465	7,605

Source: CHAS Data from the 2007-2011 American Community Survey

Substandard housing and overcrowding remain low for each of the four counties in the study area (below 1%). While substandard living conditions are low for Waukesha County, analysis of the CHAS data indicates areas in which residents of racial and ethnic minority groups experience disproportionately greater need in relation to housing problems and severe housing problems, even when income is taken into account. HUD defines disproportionately greater need as persons from racial or ethnic minority groups that have problems at a rate 10% or more of the income group as a whole. For the purposes of this analysis, HUD’s definition of disproportionately greater need will apply. Notably, some residents of racial and ethnic groups continue to experience housing problems and severe housing problems even as income rises. Below is a summary of these needs:

- At 30% of Area Median Income (AMI), American Indians/Alaska Natives and Pacific Islanders both have disproportionately greater need, with 100.0% of households in each group experiencing housing problems. Hispanic residents also have disproportionately greater need, with 98.1% of households experiencing housing problems. Within this income group, all racial and ethnic groups experience disproportionately greater rates of severe housing problems (100.0% for American Indians/Alaska Natives, 85.5% for Hispanics, 81.7% for Blacks, and 80.0% for Asians).
- At the 30-50% AMI income level, Hispanic households have a disproportionately greater need, with 89.7% of Hispanic residents experiencing housing problems. Within this income bracket, 65.5% of Black households, 57.7% of Asian households, and 54.4% of Hispanic households experience severe housing problems and have disproportionately greater need.
- At 50-80% AMI, housing problems affect 78.5% of African American households, 65.6% of Asian households, and 58.2% of Hispanic households. In this income group, 32.1% of Black households experience severe housing problems, resulting in a disproportionately greater need.

- At 80-100% AMI, 67.4% of Black households experience housing problems, as do 47.4% of Asian households. In this income level, 18.9% of Asian residents experience severe housing problems, resulting in a disproportionately greater need.

Stakeholder Input

The main housing needs identified in each of the four counties were general renovations including making units accessible for elderly and disabled residents via retro-fitting or repairs to older units. It was reported that multi-family units were more likely to make repairs for accessibility, but that it was more difficult to get accessibility features added to single family rental units with private owners. The housing stock available for affordable housing was described as older housing stock in need of façade repairs and rehabilitation in each of the counties. Some who were interviewed described the housing stock for very-low income and low-income residents to be substandard in each of the four counties studied. Many interviewees identified absentee landlords as the main reason for substandard properties with land lords either being out of state or owning multiple low-income properties throughout the counties. Nearly all stakeholders expressed a preference towards rehabilitation of older housing stock before building newer units.

Housing Affordability

Because many minorities, people with disabilities, and other protected classes tend to have lower than average incomes, housing affordability becomes an important aspect of fair housing choice. HUD considers housing affordable if less than 30% of a family's income is spent on housing.³⁴ For homeowners the 30% threshold includes mortgage payments, real estate taxes, homeowners and mortgage insurance, any association fess (i.e. homeowner's association, condo, or mobile home fees), and utilities, while rent and utilities is included in the threshold for renters. As discussed in the section above, households that spend beyond that threshold are considered by HUD to be "cost burdened" while families paying 50% or more of income for housing expenses are considered to be "severely cost burdened." Cost burdened households are statistically more likely to have difficulty affording other basic necessities such as food, clothing, healthcare, and, especially, transportation.

Households unable to afford food are described as having food insecurity. Research indicates a cyclical effect in which food insecurity negatively impacts health and, in turn, lowers both the amount of hours spent working per week and work productivity. This results in decreased income available for food, housing, transportation, and healthcare. Other studies indicate that cost-burdened households have a lower quality of life and sense of well-being with higher rates of depression and anxiety, and lower rates of overall satisfaction than households that are not cost burdened. Yet, according to HUD, 12 million renters and homeowners in the United States spend *more than 50%* of their income on housing, or, in other words, 12 million households are severely cost burdened.

³⁴ U.S. Department of Housing and Urban Development, www.hud.gov/offices/cpd/affordablehousing/index.cfm

Due to generally lower and less stable incomes, studies have shown that cost burdened renters are less able to cope with financial setbacks (such as a reduction in job hours and income, or a job loss) and therefore are often at an increased risk of poverty and homelessness. Faced with such a financial setback, a cost burdened household often must choose between rent and food or rent and healthcare.

Housing Costs by County								
Subject	Waukesha		Washington		Jefferson		Ozaukee	
	Count	%	Count	%	Count	%	Count	%
Selected Monthly Owner Costs								
With a mortgage	85,373	--	28,814	--	16,212	--	18,175	--
Less than \$300	53	0.1%	0	0.0%	0	0.0%	15	0.1%
\$300 to \$499	384	0.4%	205	0.7%	135	0.8%	86	0.5%
\$500 to \$699	1,267	1.5%	484	1.7%	294	1.8%	212	1.2%
\$700 to \$999	3,904	4.6%	2,095	7.3%	1,581	9.8%	795	4.4%
\$1,000 to \$1,499	18,462	21.6%	7,689	26.7%	5,767	35.6%	4,378	24.1%
\$1,500 to \$1,999	25,828	30.2%	8,710	30.2%	4,884	30.1%	4,833	26.6%
\$2,000 or more	35,633	41.7%	9,644	33.5%	3,551	21.9%	7,856	43.2%
Median (dollars)	1,855	--	1,703	--	1,531	--	1,855	--
Without a mortgage	31,838	--	11,649	--	6,596	--	8,633	--
Less than \$100	33	0.1%	46	0.4%	28	0.4%	44	0.5%
\$100 to \$199	209	0.7%	100	0.9%	146	2.2%	16	0.2%
\$200 to \$299	602	1.9%	259	2.2%	191	2.9%	131	1.5%
\$300 to \$399	1,752	5.5%	832	7.1%	831	12.6%	608	7.0%
\$400 or more	29,242	91.8%	10,412	89.4%	5,400	81.9%	7,834	90.7%
Median (dollars)	632	--	570	--	526	--	657	--
Gross Rent								
Occupied units	34,712	--	11,072	--	8,700	--	6,982	--
Less than \$200	138	0.4%	27	0.2%	101	1.2%	56	0.8%
\$200 to \$299	465	1.3%	283	2.6%	260	3.0%	113	1.6%
\$300 to \$499	1,542	4.4%	587	5.3%	877	10.1%	260	3.7%
\$500 to \$749	7,712	22.2%	3,669	33.1%	3,017	34.7%	2,123	30.4%
\$750 to \$999	11,795	34.0%	3,885	35.1%	2,929	33.7%	2,553	36.6%
\$1,000 to \$1,499	9,920	28.6%	2,218	20.0%	1,317	15.1%	1,506	21.6%
\$1,500 or more	3,140	9.0%	403	3.6%	199	2.3%	369	5.3%
Median (dollars)	906	--	800	--	757	--	819	--
Gross Rent (as a percent of household income)								
> 15.0%	4,659	13.6%	1,295	11.8%	981	11.4%	982	14.1%
15.0% to 19.9%	5,088	14.8%	1,713	15.6%	1,235	14.3%	1,170	16.9%
20.0% to 24.9%	5,200	15.1%	1,784	16.2%	1,431	16.7%	1,026	14.8%
25.0% to 29.9%	4,210	12.3%	1,557	14.1%	1,086	12.6%	829	11.9%
30.0% to 34.9%	2,780	8.1%	1,053	9.6%	861	10.0%	598	8.6%
35.0% or more	12,398	36.1%	3,611	32.8%	3,007	34.9%	2,338	33.7%

Source: 2008-2012 American Community Survey Table DP04

The National Low Income Housing Coalition's *Out of Reach* 2014 Annual Report is designed to examine housing affordability by utilizing HUD's Fair Market Rate (FMR) and calculating the necessary wages to afford a property based on HUD's recommendation that housing costs not exhaust more than 30% of income. While data is available at the county level, state-wide results are useful in order to help demonstrate how affordable properties are in Waukesha, Jefferson, Washington, and Ozaukee Counties. In Wisconsin, a worker earning minimum wage would need to work 81 hours per week for a total of 52 weeks per year in order to afford the fair market rate for a two-bedroom apartment. The FMR for a two-bedroom apartment is \$767 requiring income of \$2,558 per month, or \$30,697 annually, to be affordable.

In Waukesha County, the wage needed to afford the \$812 FMR rate for a two-bedroom apartment is \$15.62 per hour while average hourly wages for a renter are only \$12.63, a deficit of \$2.99 per hour. Monthly rent would have to be \$657 per month to meet the 30% HUD recommendation. Results are similar for Washington County, except that the average renter wage (\$10.42) is lower, causing an even greater economic shortfall and requiring a rental rate of \$542 to meet the 30% threshold. Jefferson also has a FMR of \$812 and a necessary hourly income of \$15.62. However, the average hourly wage for a renter is only \$10.02, resulting in a large shortage of \$5.60 per hour. Rent would have to decrease to \$521 in order to meet the 30% threshold.

Stakeholder Input

Many stakeholders identified a limited amount of affordable housing units, especially rental units, in each of the four counties of the study area. Newly built housing units were reported to be less affordable and equipped with higher end amenities and structural materials. These properties have credit and income requirements that make them inaccessible to very- low- income, low-income, and some moderate-income residents. Interviewees indicated that there were larger selections of rental options for those with very-low incomes and those with higher incomes, but limited options for residents earning moderate incomes. There were several reports of residents spending more than the recommended HUD amount of 30% or less of monthly income on housing costs. Some stakeholders reported residents paying in excess of 50% of their monthly income towards housing expenses and having extremely limited monies left for other necessities, such as, transportation, food, clothing, etc.

Stakeholders also indicated limited multi-family units and an increased need for these units as the overall population is increasing and aging in each of the four counties. Stakeholders also expressed concern regarding the clustering of affordable housing units in specific areas potentially creating segregation and having a negative impact on school performance. Stakeholders also reported wait list of 6-8 years to receive voucher assistance with affordable housing and noted that the first-come-first serve policy often makes it difficult for the neediest residents to receive assistance.

Regarding the development of new affordable housing units, several barriers were identified. One of the major barriers identified in each of the four counties were negative community perceptions

of what constitutes affordable housing. Many stakeholders indicated a misconception that affordable housing was aimed at only very-low and low-income residents and that affordable housing would decrease property values, increase crime rates, and reduce the performance of local schools. During the planning process, many of those interviewed described significant challenges from the public regarding the development of affordable housing units. Economic development and job growth was closely connected to developing housing near current and planned industrial and business parks. However, there was not a clear definition in either county of what constituted workforce housing with the definition changing between government agencies, developers, and service providers. While most interviewees agreed that workforce housing should allow workers to live and work in the same region, agreement regarding salary ranges and overall cost of rental and single family homes varied. It was indicated that the pricing of single family homes exceeds affordability based on average household incomes.

Land acquisition, zoning laws, and leveraging public and private funds in order to garner the necessary resources to build affordable units were identified as barriers to expanding affordable housing. Land costs were described as high, as where the cost of construction, serving as barriers to acquisition and building. There was also indications that zoning and planning throughout the region was inconsistent. Stakeholders indicated difficulty in planning due to the vastness of the region and the varying housing and planning needs of rural residents versus residents in more urban and sub-urban areas. Additionally, within the varying counties, especially Jefferson and Washington Counties, there are smaller communities located 10-20 miles apart with varying needs. In relation to zoning, many cities, towns, and villages establish their own zoning regulations that impact the development of single family units, multi-family units, lot sizes, etc.

Housing Accessibility

As a protected class, people with disabilities have a right to fair housing choice, yet the housing needs of this population can diverge significantly from the needs of other groups. People with mobility impairments are likely to need housing with features that improve accessibility and facilitate maneuverability within the unit, i.e. first floor units, elevators, ramps, floor level bathrooms tubs, etc.. People with visual and hearing deficiencies may need accommodation for service animals, alternative types of fire and smoke alarms, alternative phone services, and communications in braille. People with cognitive disabilities may require the assistance of live-in aides or a group home setting. Group homes are discussed elsewhere in this report in sections related to zoning and land use, however the availability of accessible units is generally discussed here.

HUD's Office of Multi-Family Housing maintains a directory by state of HUD-insured and HUD-subsidized properties containing units for the elderly and disabled.³⁵ The directory for Wisconsin lists over 35,000 properties throughout the state, however the directory is not sortable by factors

³⁵ http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_13056.pdf

such as location, disability type, or unit size and availability. Other more dynamic resources exist for the identification of accessible units, notably a nonprofit housing locator service known as Socialserve.com. A sample search conducted on August 29, 2014 found 220 properties in Waukesha County (94 with a wait list), 33 properties in Jefferson County (19 with a wait list), 16 properties in Ozaukee County (13 with a wait list), and 180 properties in Washington County (72 with a wait list) accessible units that were available for rent.

Stakeholder Input

Many stakeholders identified current housing stock able to meet the needs of disabled and elderly residents. However, the populations are aging in each of the four counties increasing the number of elderly residents. Stakeholders identified the need to plan for increased units of affordable housing for elderly residents and those with physical disabilities. Providing supportive services, such as, supportive living, memory care, social services, health care, and transportation to medical and community appointments were also reported as needs in affordable housing communities for elderly residents. It was also indicated that, while many elderly residents often want to downsize and move to communities targeting their needs, currently programming is limited to allow the elderly to age and remain in their home.

Barriers accessing affordable and accessible housing for younger residents were identified including a stigma associated with staying in units designed for elderly residents and a misconception that these communities and resources do not serve younger residents with disabilities. A need for greater resources, education, and outreach to help younger disabled residents seek affordable and accessible housing was identified by stakeholders. Ensuring that younger disabled residents were able to access supportive services in their living environments including transportation, health care, supportive counseling, and mental health counseling were also an identified needs.

During the planning process, stakeholders indicated concern that facilities serving disabled and elderly residents were located in specific areas that prevented mainstreaming and lead to segregation of these residents. Severe stigmas associated with housing residents with mental health and behavioral health issues that made housing inaccessible to these residents were reported by several stakeholders. While current zoning was reported to allow the building of group homes, some stakeholders indicated a stigma with having group homes build in communities by local residents, creating a challenge for residents in need of a group home setting to receive accessible housing in a mainstreamed environment.

Public Investment, Infrastructure and Education

Public investment in transportation and infrastructure has an impact on both housing availability and affordability. Within the four-county study area, the availability and affordability of housing are linked to public resources that are expended for essential services. This section addresses transportation services, the availability of safe and accessible water, and the availability of sanitary sewer systems that collect, treat, and discharge wastewater.

This section also reports on the performance of public schools serving the residents of Waukesha, Jefferson, Ozaukee, and Washington Counties. Research indicates that the presence of high quality and high performing educational systems and facilities is a key criteria utilized by residents as they choose where to live. The relationships between educational attainment, educational resources, and housing choice are also explored.

Transportation

Waukesha County has a regional airport situated in the city of Waukesha. The County airport is used for the transportation of goods and services by businesses and also transports the general population in some instances. Characterized as a Transports/Corporate/ Airport, it serves small airplanes, corporate jets, and small passenger and cargo jets. Three aviation organizations are located at the airport including, The Waukesha Aviation Club (provides information and tours to residents and visitors), Civil Air Patrol (volunteer assistance in the case of emergencies, aerospace education, and a Cadet Program), and the Wisconsin Wing of the Commemorative Air Force. The airport has been shown in local studies to have a positive economic impact on the region. This positive impact includes direct impact revenues like jobs, payroll, and sales; indirect impact, such as, monies spent by visitors using the airport on goods, lodging, gas, shopping, etc.; and induced impacts by suppliers to both the airport and visitors of the airports like office supply chains, water companies, restaurants, etc.³⁶

Waukesha Metro Transit oversees the operation of bus routes that travel throughout the City of Waukesha, and parts of Waukesha and Milwaukee Counties. Waukesha Metro Transit directly operates routes to provide bus service within the City of Waukesha and its environs. Waukesha Metro Transit also administers for Waukesha County the County's service contracts with the Milwaukee County Transit System and Wisconsin Coach Lines, Inc. for bus routes comprising the Waukesha County Transit System. Wisconsin Coach Lines and the Milwaukee County Transit System operate these routes for Waukesha Metro Transit. Only 27% of riders on city routes had access to an automobile and 79% of riders had household incomes under \$35,000.

³⁶ http://www.waukeshacounty.gov/uploadedFiles/Media/Images/Airport/Final_Economic_Impact_Analysis_Report_2009.pdf

In addition, a paratransit service for people with disabilities is provided by the City of Waukesha transit system. Paratransit service is provided to individuals with disabilities who cannot use fixed route service in accordance with the Federal Americans with Disabilities Act (ADA) of 1990. All transit vehicles that provide conventional fixed-route transit service must be accessible to persons with disabilities, including those persons using wheelchairs.

Cash only fares range from \$2.00 one-way, \$5.00 day passes, \$1.00 for senior citizen and disabled passengers (Medicare or Metro ID of disability required), and \$1.25 for youth ages 5-18 (valid proof of school enrollment required). Passes for 31 days are available at special Metro Fare Outlets at the following rates, adults (\$46.00), youth (\$30.00), and senior citizens/disabled (\$35.00). Express routes services can be purchased at additional higher rates in the range of \$1.00-\$2.00 each way. The Aging and Disability Resource Center operates two taxi services for senior citizen and disabled residents with fares ranging from \$3.50-\$7.25 one-way. While, rates appear affordable, households may have more than one resident needing to use bus services. For examples, a household of one adult and 2 children would require \$106 for a 31 day pass. The housing affordability section of this analysis indicated that over 30% of residents in each county were cost burdened. These residents are most likely to utilize public transportation, although they are less likely to be able to afford it due their housing costs.

Neither Jefferson, Ozaukee, nor Washington Counties are served by fixed route local public transportation systems. Stakeholder input, which will be discussed in greater detail in the stakeholder input section, indicated that the lack of a robust transit system is a barrier to employment and accessing amenities and public/social services. Shared ride taxi services are available in the cities of Fort Atkinson, Jefferson, Lake Mills, Watertown, and Whitewater in Jefferson County. Reduced rates for the elderly and people with disabilities are available at a rate of \$2.00 one way to locations within city limits. Rides to Senior Dining are provided at a rate of \$1.00-\$2.00 each way, this service unavailable in Watertown, depending on the city. Medical Transportation Management provides transportation to medical appointments for a co-pay of \$10.00 out of county and \$2.00 within county. Jefferson County Human Services operates a volunteer driver program for elderly and disabled residents needing transportation to medical appointments whose benefits have not begun. The county department of human services also provides a van to take elderly and disabled residents shopping for \$1.00 per trip. Jefferson County transport veteran's to the VA hospital throughout the week.

Ozaukee County operates a Shared-Ride taxi service available to all. Taxi services are provided throughout the county, which is divided into six zones. Costs vary from \$2.75-6.50 per trip for adults, \$2.25-\$5.25 per trip for students, and \$2.25-\$5.25 per trip for elderly and disabled, depending on the zone. The taxi service does operate wheelchair accessible vans. Weekly out of county transit for veterans is provided. Two local nonprofits provide voluntary driving services for the elderly and disabled and Life Star Emergency Medical Services provides ambulance services within Ozaukee and Milwaukee counties. Ozaukee County Express provides bus service between

Ozaukee and Milwaukee Counties with included shuttle service to most employer from designated park and ride lots. Fare ranges from \$2.25 per way. \$17.50 for a weekly pass, or \$64.00 for a monthly pass.

Washington County also operates a Shared-Ride taxi system which provides service throughout Washington County and into areas of Menomonee Falls. Fares are based on distance and range from \$4.25-\$9.00 one-way for adults, \$3.25-\$ 8.00 one-way for students, and \$2.50-\$5.75 one-way for senior citizen and the disabled. Washington Commuter Express provides service from Washington County to Milwaukee and park and rides that service business parks in West Bend, Germantown, and Richfield. Fares is \$3.25 one-way.

Stakeholder Input

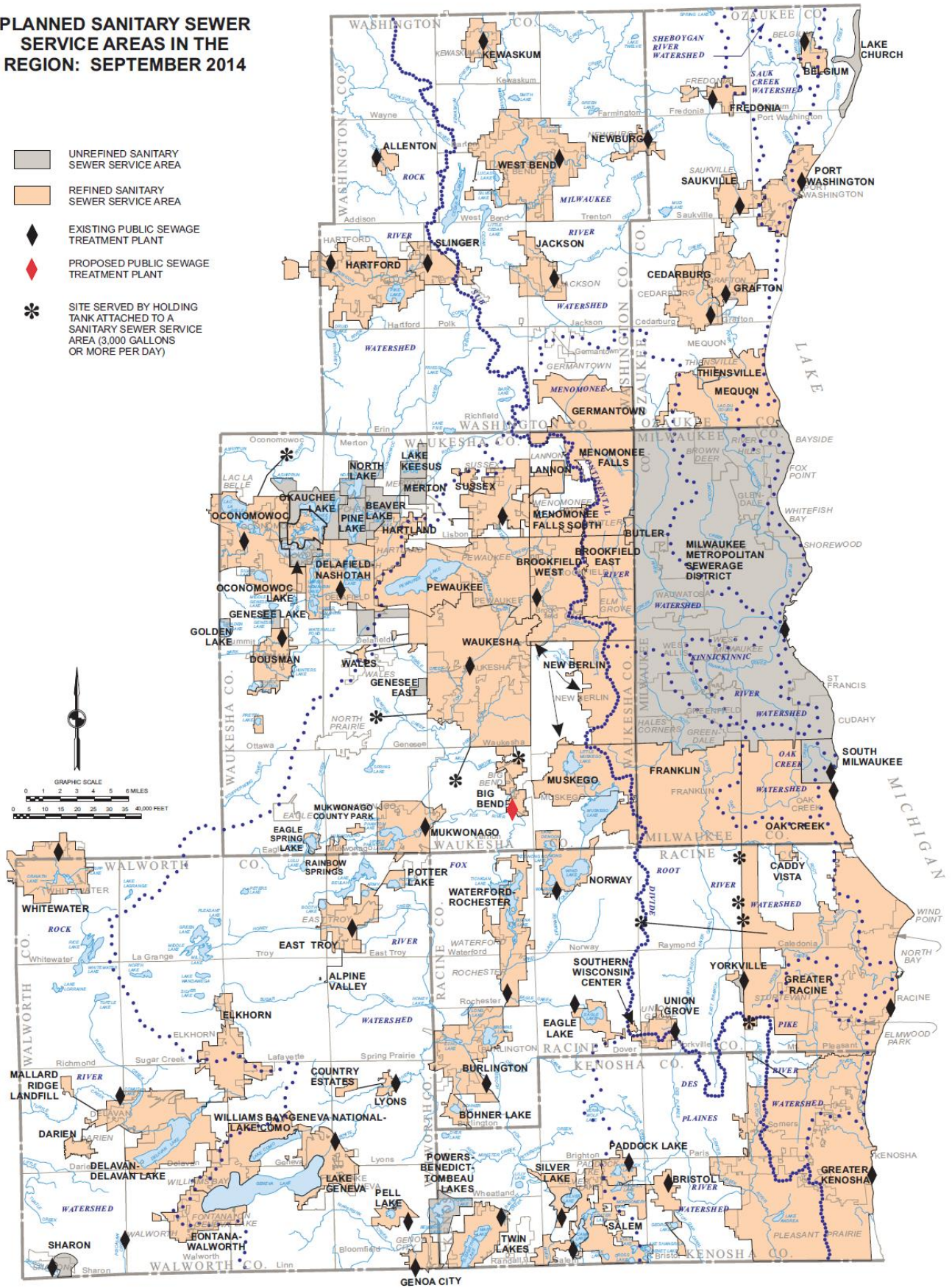
Nearly all stakeholders interviewed during the planning process identified transportation as a crucial area of need. Stakeholders in Waukesha County identified a persistent misconception that people do not utilize local bus transit that may inhibit planning in this area. It was also reported that the cost of public transportation within Waukesha County was high and that several of the residents in need of public transit were unable to afford it. Low availability of public transit near business and industrial parks were identified as barriers to attracting new business and workers. Low availability of bike paths and walkways were also identified as barriers to accessing employment and community services and amenities for residents unable to afford cars or public transit. Jefferson, Washington, and Ozaukee Counties all lack public transportation beyond taxi services, which typically run only within the county, and transportation services designed for the elderly and disabled. It was reported that this is limiting to residents ability to access employment and services in other counties. Social and public services were described as concentrated in Waukesha County, leaving residents unable to afford cars with an inability to access services.

Water & Sewer

The four county study area is served by several water and sewer systems typically run independently by local cities and villages (see maps on the following pages). There are 10 public sewage treatment plants serving Waukesha County. Seven plants are located within the County including plants in Oconomowoc, Dousman, Delafield-Hartland, Mukwonago, Sussex, Brookfield (west side) and the city of Waukesha. Two plants, Jones Island and South Shore, are operated by the Milwaukee Metropolitan Sewerage District (MMSD), and serve all or portions of the cities of Brookfield, Muskego, and New Berlin and the villages of Butler, Elm Grove, and Menomonee Falls. The final plant is located in the town of Norway in Racine County and serves a small portion of the city of Muskego. Administration of private sewage systems is governed by Waukesha County with responsibility assigned to the Department of Parks and Land Use – Environmental Health Division. Waukesha County is served by 16 public water utilities which provide water for approximately 62% of the County's residents.

PLANNED SANITARY SEWER SERVICE AREAS IN THE REGION: SEPTEMBER 2014




- UNREFINED SANITARY SEWER SERVICE AREA
- REFINED SANITARY SEWER SERVICE AREA
- EXISTING PUBLIC SEWAGE TREATMENT PLANT
- PROPOSED PUBLIC SEWAGE TREATMENT PLANT
- ✱ SITE SERVED BY HOLDING TANK ATTACHED TO A SANITARY SEWER SERVICE AREA (3,000 GALLONS OR MORE PER DAY)

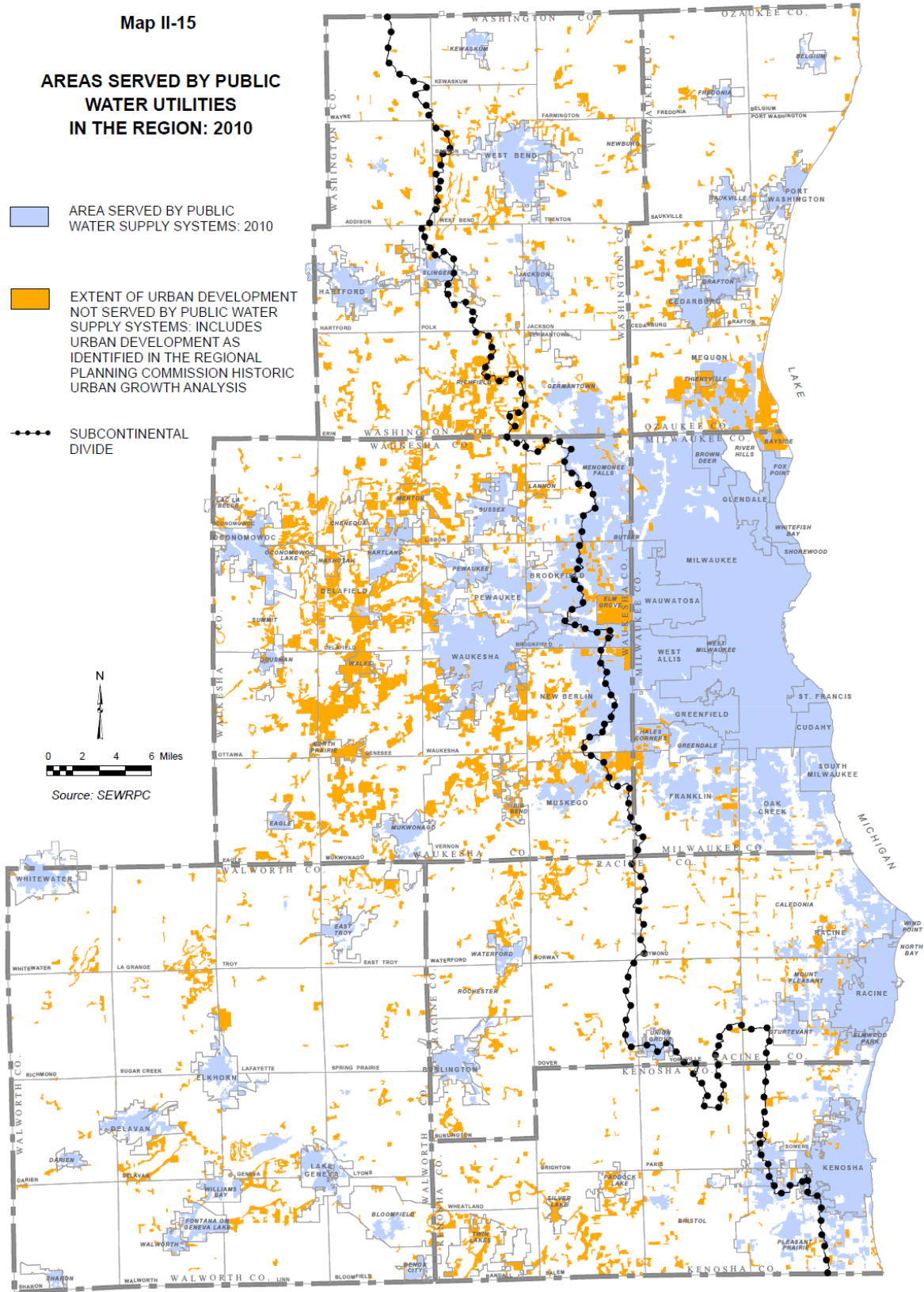


Source: SEWRPC.

Map II-15

AREAS SERVED BY PUBLIC WATER UTILITIES IN THE REGION: 2010

-  AREA SERVED BY PUBLIC WATER SUPPLY SYSTEMS: 2010
-  EXTENT OF URBAN DEVELOPMENT NOT SERVED BY PUBLIC WATER SUPPLY SYSTEMS: INCLUDES URBAN DEVELOPMENT AS IDENTIFIED IN THE REGIONAL PLANNING COMMISSION HISTORIC URBAN GROWTH ANALYSIS
-  SUBCONTINENTAL DIVIDE



Source: SEWRPC

Source: SEWRPC

The City of Waukesha completed reports on its storm water management system in 2013 and its waste water treatment facilities in 2011. The 2011 waste water treatment report reviewed existing treatment facilities, permit requirements, and space needs. Findings included a need to reduce hydraulic bottlenecks and overflow, a need for replacement of equipment at the plant due to end of life cycle use for several key components, and a need to increase UV disinfection capacity to meet peak hourly flow. The report develops a 20 year plan, with 5 year increments, that will allow the city to make needed upgrades and repairs. In 2012, the City of Waukesha established a goal and plan to reduce storm water flooding throughout the city. Based on property impact, public safety, financial leveraging, and environmental impact drainage priority areas were set that addressed street flooding.

Jefferson County's water and sewer systems are managed independently from various public works in small cities, towns, and villages including: Jefferson, Palmyra, Sullivan, Lake Mills, etc. Ozaukee County operates a Department of Public Works with a focus on transportation issues within the County and a Department of Land and Water Management with a focus on land and water conservation and protection. Public water and sanitary sewer systems in Ozaukee County are operated by the Cities of Port Washington and Cedarburg and the Villages of Belgium, Fredonia, Grafton, and Saukville. The village of Thiensville and portions of the city of Mequon are served by MMSD (sewer service). We-Energies provides water service to portions of Thiensville and Mequon with water purchased from the City of Milwaukee.

Washington County, similar to Jefferson County, has several smaller wastewater treatment facilities, including those operated by the Cities of Hartford and West Bend, the Villages of Jackson, Kewaskum, Newburg, and Slinger, and a portion of the Town of Addison. A portion of the Village of Germantown is served by MMSD. Public water utilities are operated by each of these municipalities with the exception of Newburg. While each local water and/or waste management system serves to meet the needs of local residents, future land use and development projects will require collaboration across facilities and services. Future public water supply and sewer treatment facilities and service areas are documented in SEWRPC's Regional Water Supply Plan and the Regional Water Quality Management Plan, respectively. A further discussion and graphic depiction of zoning issues related to water, sewer, and development occurs in the zoning section of this report.

Stakeholder Input

Stakeholders reported a high level of satisfaction with the quantity, distribution, and maintenance of community resources and public works, such as parks, recreational facilities, police and fire services, etc. Interviewees expressed pride in these facilities and their upkeep and noted that some police and fire services consisted of engaged community volunteers. Stakeholders identified strong school systems in each of the counties. Schools, parks, and recreational facilities were described as community assets. There were no barriers reported relate to resource allocation. A small number stakeholders did report awareness of instances in which students of racial and ethnic minority groups,

primarily Hispanic and African American, were teased and discriminated against by students in the school systems, especially in the middle and high schools.

Education and Schools Analysis

Overview of School Districts

Waukesha Public School System has a total of 109 schools including 70 elementary schools, 21 middle schools, and 24 high schools serving a total of 63,402 students. Several cities, towns, and villages within Waukesha County operate their own school districts and systems. Students who are members of racial and ethnic minority groups account for 16% of students enrolled throughout the entire Waukesha system, which is less than the Wisconsin rate of 27% minority enrollment. Racial and ethnic minority enrollment is 18% for elementary schools, 16% for middle schools, and 14% for high schools. Hispanic and Asian students account for the majority of minority student enrollment throughout the districts, especially in elementary schools. However, there are schools in which African American students are the primary minority group enrolled including East High School, Menomonee Falls High School, North Middle School, and Hamilton High School. The student to teacher ratio is 17:1, slightly above the Wisconsin state ratio of 15:1.³⁷

Jefferson County Public School system has a total of 30 schools, and similar to Waukesha, many cities and towns operate their own schools and districts. There are 17 elementary schools, 7 middle schools, and 6 high schools with a total of 10,810 students. Enrollment for racial and ethnic minority students is 16%, primarily Hispanic, for the entire district and 19% for elementary schools, 15% of middle schools, and 12% for high schools. These rates are below statewide rates for minority student enrollment. The student to teacher ratio is the same as that of the state at 15:1.³⁸

Ozaukee County Public School System has a total of 26 schools that serve 12,848 students. There are 15 elementary schools, 7 middle schools, and 6 high schools. Cities and towns located within Ozaukee County operate their own schools and school systems. Enrollment of ethnic and minority students across the County is 12%, which is below the statewide enrollment rate, and the second lowest of the four-county study area. Hispanics and Blacks are the primary ethnic and racial minority groups enrolled across the county. Minority enrollment is 13% for elementary schools, 13% for middle schools, and 12% for high schools. The student to teacher ratio is 16:1 which is slightly above the ratio for the state.³⁹

Washington County Public School System serves a total of 20,056 students. There are 35 schools in the County including 23 elementary schools, 7 middle schools, and 7 high schools. As is the case across the study area, cities and towns within the region operate their own schools and districts. Enrollment of students from racial and ethnic minority groups is 10%, which is below state

³⁷ http://www.publicschoolreview.com/county_schools/stateid/WI/county/55133

³⁸ http://www.publicschoolreview.com/county_schools/stateid/WI/county/55055

³⁹ http://www.publicschoolreview.com/county_schools/stateid/WI/county/55089

enrollment and is the lowest of any Consortium county. Minority enrollment is 11% for elementary schools, 12% for middle schools, and 8% for high schools. The student to teacher ratio is 17:1 which is slightly above the state ratio.⁴⁰

Educational Attainment Levels

The charts below depict information obtained from the 2008-2012 American Community Survey regarding age and educational attainment in each of the four Consortium counties. Wisconsin state and national goals and trends require high rates of high school graduation and an increasingly college educated workforce. This data is useful in examining the performance of each county in these key areas.

Waukesha County Age and Educational Attainment					
	Age 18-24	Age 25-34	Age 35-44	Age 45-64	Age 65+
Less than High School	11.2%	3.7%	2.6%	2.6%	11.4%
High School Completion or Equivalent	29.0%	96.3%	97.4%	97.4%	89.6%
Bachelor's degree of higher	13.4%	44.2%	49.0%	39.9%	25.6%

Source: 2008-2012 American Community Survey

Completion of high school increased as age level increased in Waukesha County with the exception of residents age 65 or older. Completion of a Bachelor's degree rose from ages 18 to 44, leveling off for residents in the 45 to 64 age group, before decreasing in the 65+ age bracket. In general, this data is indicative of higher educational levels and attainment with high school completion rates by age 25 in the high ninetieth percentile. The American Community Survey also tracks poverty rates in relation to educational attainment. In Waukesha County, residents with less than a high school education had a poverty rate (13.0%) that was more than double the poverty rate of high school graduates (5.5%).

Jefferson County Age and Educational Attainment					
	Age 18-24	Age 25-34	Age 35-44	Age 45-64	Age 65+
Less than High School	10.5%	6.6%	7.2%	8.0%	17.5%
High School Completion or Equivalent	31.7%	93.4%	92.8%	92.0%	82.5%
Bachelor's degree of higher	6.9%	27.3%	23.4%	23.2%	17.6%

Source: 2008-2012 American Community Survey

High school completion rates improved as residents aged in Jefferson County with the exception of residents age 65 or older. Jefferson County has higher rates of residents who have not completed high school and lower rates of residents completing a Bachelor's degree. Completion of a Bachelor's

⁴⁰ http://www.publicschoolreview.com/county_schools/stateid/WI/county/55131

degree remained steady between ages 25 and 64, before decreasing for residents who are age 65 years or older. Poverty rates for non-high school graduates (17.5%) are nearly double the poverty rates for high school graduates (9.5%). Jefferson County had the highest poverty rates for both graduates and non-graduates across the Consortium region indicating that educational attainment is less of a determinant of income and likelihood of poverty than in other Consortium counties.

Ozaukee County Age and Educational Attainment					
	Age 18-24	Age 25-34	Age 35-44	Age 45-64	Age 65+
Less than High School	11.1%	2.6%	2.1%	1.8%	11.1%
High School Completion or Equivalent	34.2%	97.4%	97.9%	98.2%	88.9%
Bachelor’s degree of higher	15.5%	45.4%	51.4%	46.7%	31.6%

Source: 2008-2012 American Community Survey

Educational attainment was highest in Ozaukee County in comparison to the other counties in the Consortium. High school completion rose with age with the exception of residents who are 65 years of age or older. Bachelor’s degree completion also rose with age until residents reached ages 45 years of age or more. Over half of residents age 35-44 have completed Bachelor’s degrees. Poverty rates for non-high school graduates (7.7%) did not vary greatly from high school graduates (5.5%). Poverty rates for both high school graduates and non-graduates were lower in Ozaukee County than in other counties in the Consortium.

High school completion rose with age in Washington County with the exception of residents who are 65 years of age or older. Bachelor’s degree completion also rose with age until residents reached ages 45 years of age or more. The poverty rate for non-high school graduates (11.1%) was more than double that of high school graduates (4.9%).

Washington County Age and Educational Attainment					
	Age 18-24	Age 25-34	Age 35-44	Age 45-64	Age 65+
Less than High School	12.6%	6.0%	4.6%	4.2%	19.7%
High School Completion or Equivalent	38.3%	94.0%	95.4%	95.8%	80.3%
Bachelor’s degree of higher	6.1%	30.4%	38.0%	26.8%	15.2%

Source: 2008-2012 American Community Survey

The Wisconsin School District maintains data on post-graduation plans as part of its Performance Report. These numbers help illustrate students’ plans towards higher education or job and military training, which can be beneficial to economic growth and workforce development. Notably, Jefferson County had the lowest rate of students planning to attend a 4-year college, while Washington and Jefferson County both had large numbers of high school graduates preparing to immediately enter the workforce. Post high school graduate plans for the four-county schools are depicted in the table below.

Post Graduation Plans by School District						
School District	4-year College	Vocational/ Technical College	Employment	Military	Job Training	Miscellaneous
Waukesha	56.1%	20.3%	2.1%	2.9%	1.9%	16.6%
Jefferson	35.8%	25.2%	19.5%	4.1%	0.0%	11.3%
Ozaukee	46.0%	48.0%	6.0%	0.0%	0.0%	0.0%
Washington	66.7%	16.7%	16.7%	0.0%	0.0%	0.0%

High School Graduation Rates

Graduation rates were analyzed for academic years 2010-2011, 2011-2012, and 2012-2013 as an indicator of school performance, with higher graduation rates being indicative of higher performance. Graduation rates were obtained from the Wisconsin Department of Instruction, which utilizes an adjusted cohort rate formula.⁴¹ The tables below show high school graduation rates throughout the four-county region. Note that rates are tracked as “on time”, i.e. some students may have graduated later than their 4th year in high school; thus increasing graduation rates.

On-time graduation rates in Waukesha County are generally high, however they decreased between the 2010-2011 academic year and the 2012-2013 academic year from 92.2% to 87.8%, indicating that students may require greater support graduating by their 4th year in high school. American Indian/Alaska Native students have the lowest graduation rates for the two years they were tracked at 60.0% and 70.0% indicating a high need for support services for these students. African American and Hispanic student graduation rates were also lower than the rates for White students in each academic year, which indicates a need for greater support for these students. English proficiency was a strong determinant of graduation rates, with English proficient students graduating at rates higher than English as a second language students who were not proficient.

⁴¹ <http://wisedash.dpi.wi.gov>

Waukesha County On-Time Graduation Rates			
Population Group	2010-2011	2011-2012	2012-2013
District Total	92.2%	91.5%	87.8%
African American	80.4%	86.4%	73.3%
Hispanic	85.9%	86.4%	83.2%
Asian	96.9%	90.7%	91.4%
American Indian/Alaska Native	60.0%	---	70.0%
White	93.7%	92.1%	89.3%
ESL/English Proficient	92.7%	91.8%	87.9%
ESL/Limited English Proficiency	78.7%	82.5%	84.2%

*--- Indicates graduation rate was not tracked due to a low number of students (in most cases less than 15).

On-time graduation rates in Jefferson County were high ranging from 93.9% to 96.3% across the three year academic periods. Most racial and ethnic minority group rates were not tracked for the County due to low enrollment rates. However, Asian student graduation rates (86.7%) were lower than overall district rates. English proficiency had an inverse impact on graduation rates, with non-proficient students having the higher graduate rate.

Jefferson County On-Time Graduation Rates			
Population Group	2010-2011	2011-2012	2012-2013
District Total	93.9%	95.1%	96.3%
African American	---	---	---
Hispanic	---	---	86.7%
Asian	---	---	---
American Indian/Alaska Native	---	---	---
White	95.2%	96.2%	97.0%
ESL/English Proficient	93.5%	---	96.2%
ESL/Limited English Proficiency	100.0%	---	100.0%

*--- indicates graduation rate was not tracked due to a low number of students (in most cases less than 15).

Ozaukee County had on-time graduate rates that improved across the three year academic period from 83.7% to 91.5% indicating that services and support that students need for on-time graduation are improving. Data was not collected on minority and English proficient student graduation numbers due to limited minority student enrollment.

Ozaukee County On-Time Graduation Rates			
Population Group	2010-2011	2011-2012	2012-2013
District Total	83.7%	88.6%	91.5%

Washington County on-time graduation rates decreased during the two academic years in which data was collected, from 100.0% to 88.9%. Data was not collected on minority and English proficient student graduation numbers due to the limited number of minority students.

Washington County On-Time Graduation Rates			
Population Group	2010-2011	2011-2012	2012-2013
District Total	---	100.0%	88.9%

Retention rates throughout Waukesha County were at 93.0%, with high school dropout rates at 2.3% for the district. Truancy rates were at 4.9% across the district and attendance rates were high, averaging 94.5%. Jefferson County has a retention rate of 92.0%, an attendance rate of 95.6% across the district, a dropout rate of less than 1%, and a truancy rate of 0.1% (only 2 students were truant). Ozaukee County had a retention rate of 94%, a dropout rate of 4.2%, a truancy rate of 0.4%, and an attendance rate of 98.5%. Finally, Washington County had a retention rate of 100.0%, a truancy rate of 1.0%, an attendance rate of 93.6%, and a dropout rate of 0.0%. Across the Consortium, attendance and retention rates were high, while dropout and truancy rates were low.

Conclusion

The schools within the four-county study area performed well in terms of retention rates, attendance rates, and having low truancy and school dropout rates. Jefferson and Washington Counties have the lowest rates for educational attainment and students entering into higher education following high school. Both counties also have the highest rates of students entering directly into employment following high school completion. Overall, the four counties have low enrollment of racial and ethnic minority students. However, in several instances graduation rates are lower for these students indicating increased need for supportive services.

Access to Areas of Opportunity

This section analyzes the four-county study area using a methodology developed by HUD's Office of Policy Development and Research to "quantify the degree to which a neighborhood offers features commonly associated with opportunity."⁴² For each block group in the U.S., HUD provides a score on five "opportunity dimensions," including poverty, school proficiency, labor market engagement, jobs access, and exposure to health hazards.⁴³ HUD's index scores are calculated based on the following:

- Poverty index – family poverty rates and share of households receiving public assistance;
- School proficiency index – school-level data regarding student performance on state exams;
- Labor market engagement index – employment levels, labor force participation and educational attainment;
- Jobs access index – distance to job locations and labor supply levels; and
- Health hazards exposure index – distance to facilities releasing toxic chemicals and levels of toxicity, according to the Environmental Protection Agency (EPA).

For each block group, a value is found for each of the five indices; results are then standardized on a 0 to 100 scale based on relative ranking within the metro area (or non-metro balance of the state). For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics.

The maps that follow show the HUD-provided opportunity scores for block groups in the study area. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity. The poverty index map indicates higher poverty (and thus, lower neighborhood opportunity) in several cities and villages, including parts of Waukesha, Port Washington, West Bend, Hartford, Hartland, Watertown, and Fort Atkinson. Several block groups in the City of Waukesha also scored low in terms of school proficiency, while the rest of Waukesha, Washington, and Ozaukee Counties have high school proficiency when compared to the rest of the Milwaukee metro area. According to HUD data, school proficiency varies in Jefferson County, with the northeast (Watertown and Ixonia), the southeast (Whitewater and Palmyra), and parts of Jefferson facing lower opportunity levels compared to the Lake Mills and Sullivan areas.

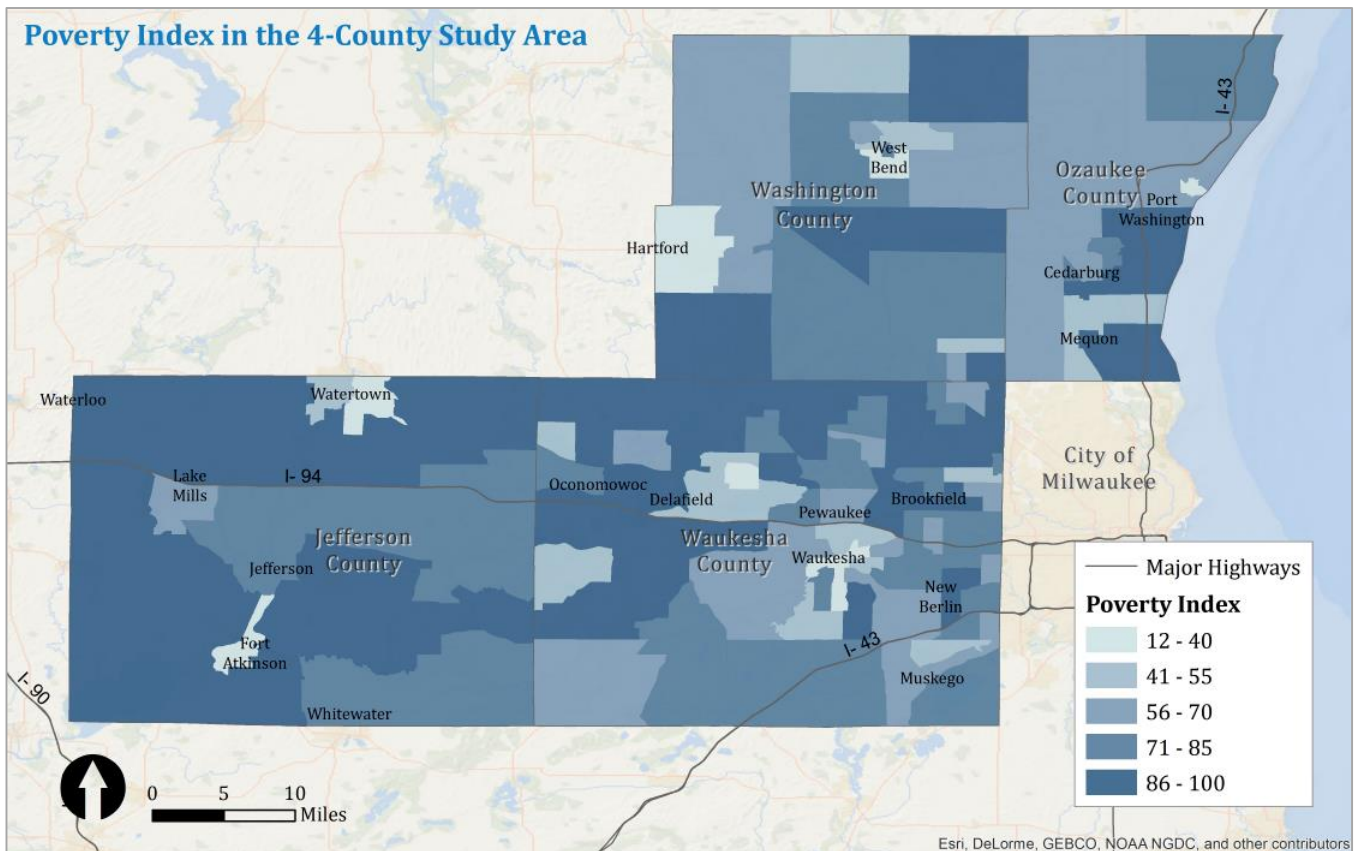
Labor market engagement and jobs access both vary within each county. Census block groups in the Cities of Waukesha, Jefferson, West Bend, and Hartford have some of the lowest labor market engagement scores; high scores are found in block groups in Cedarburg, Mequon, Brookfield, Menomonee Falls, Delafield, and just west of the Waukesha city limits. Jobs access opportunity levels are best in block groups located in cities including Waukesha, Pewaukee, New Berlin,

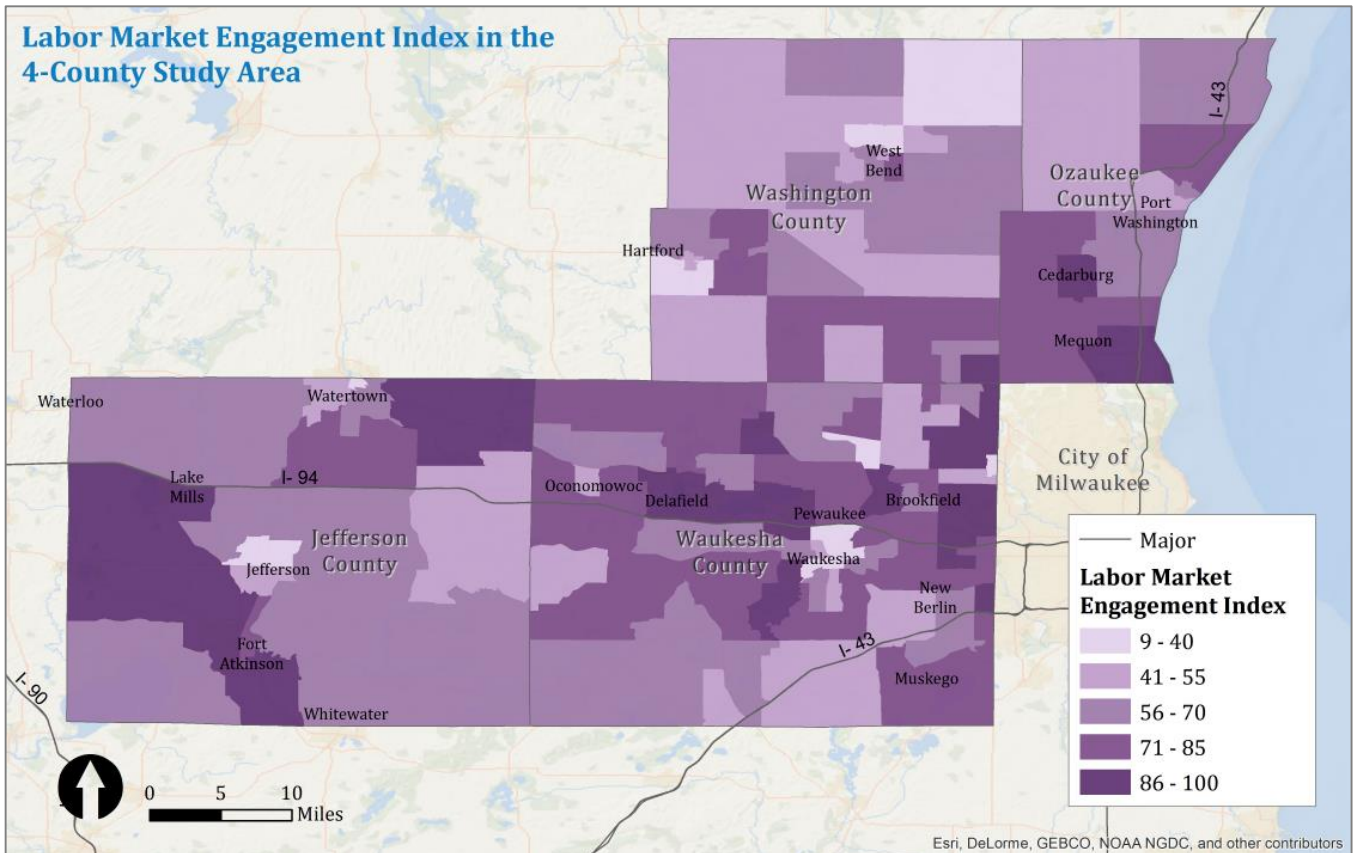
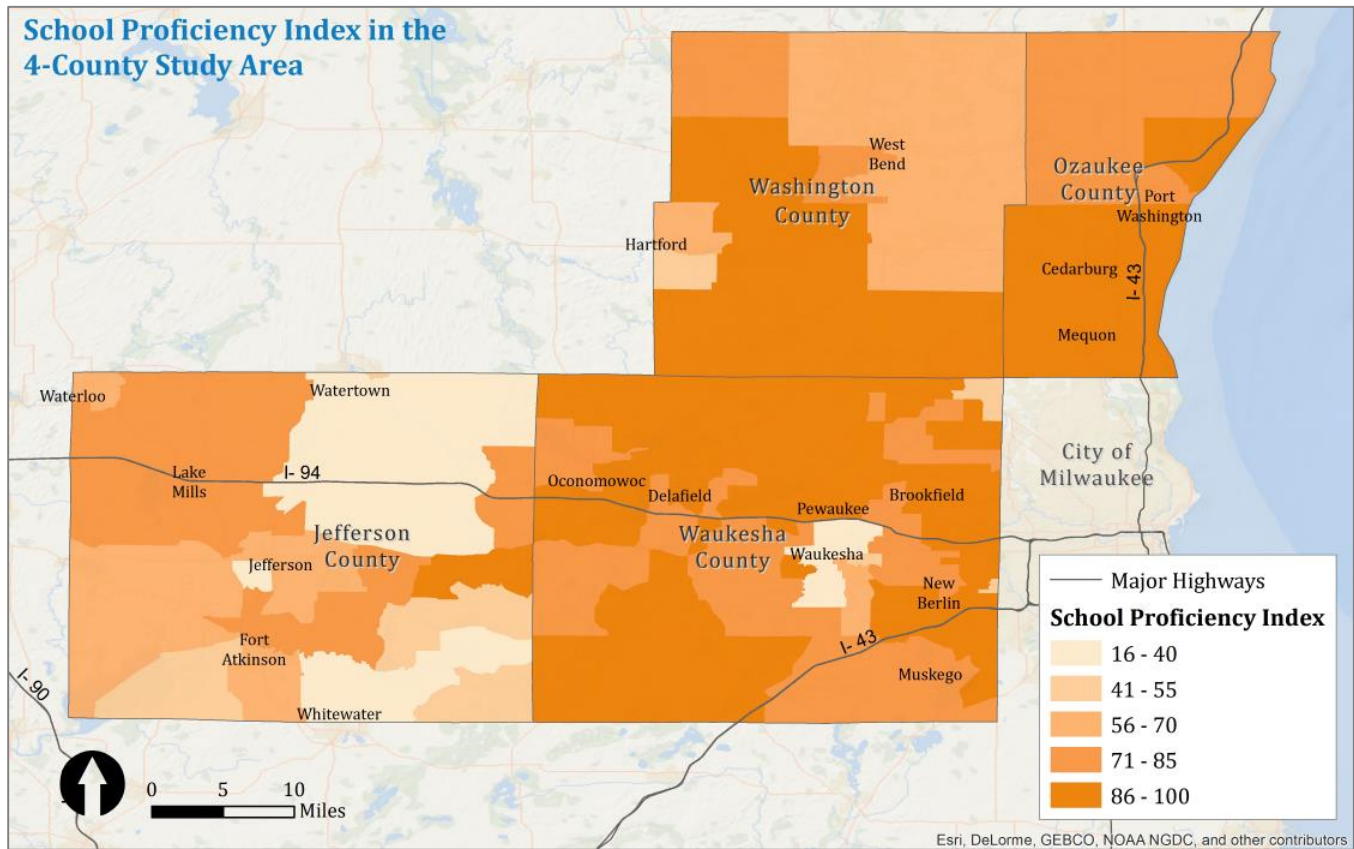
⁴² HUD Office of Policy Development and Research, "FHEA Data Documentation," Draft. 2013. p. 4.

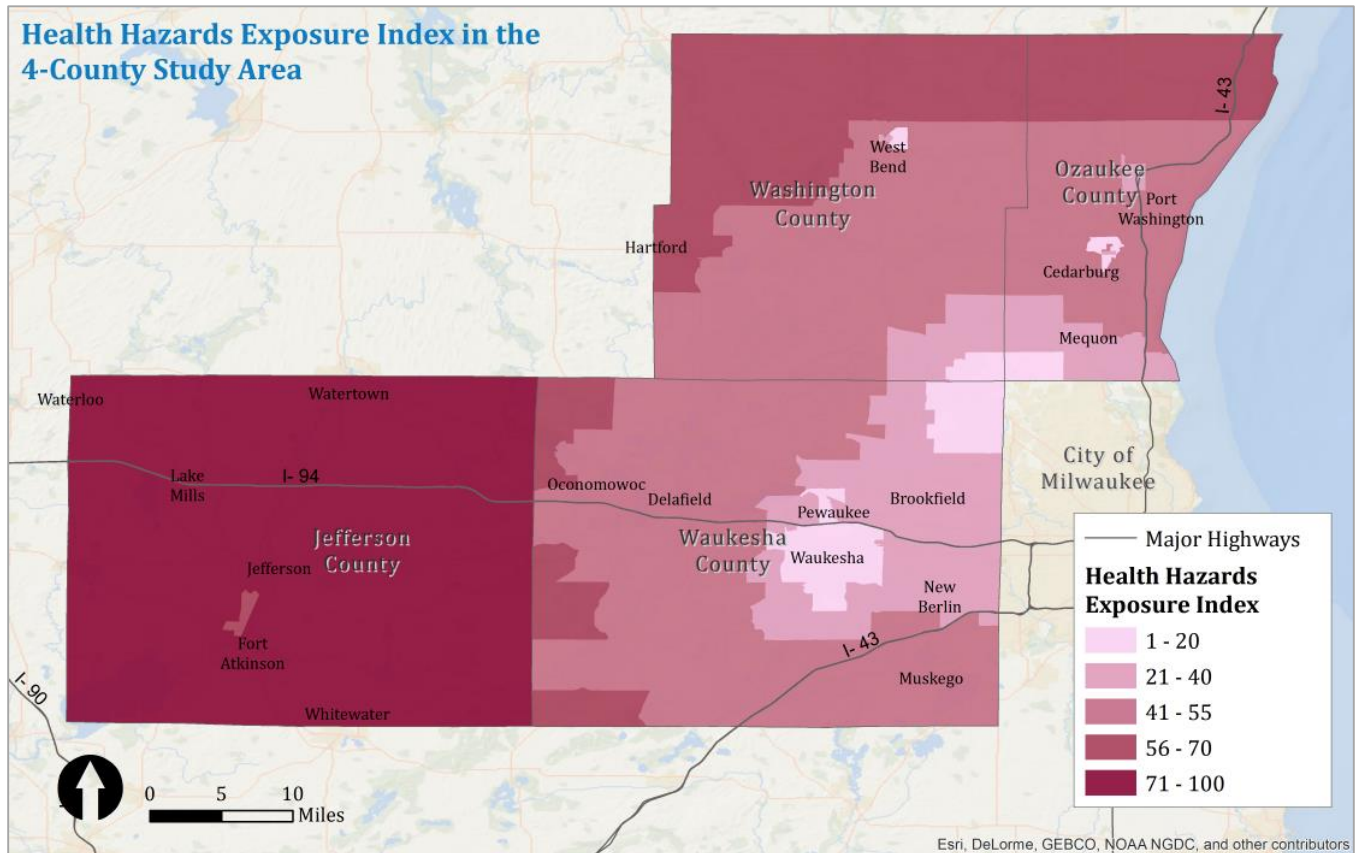
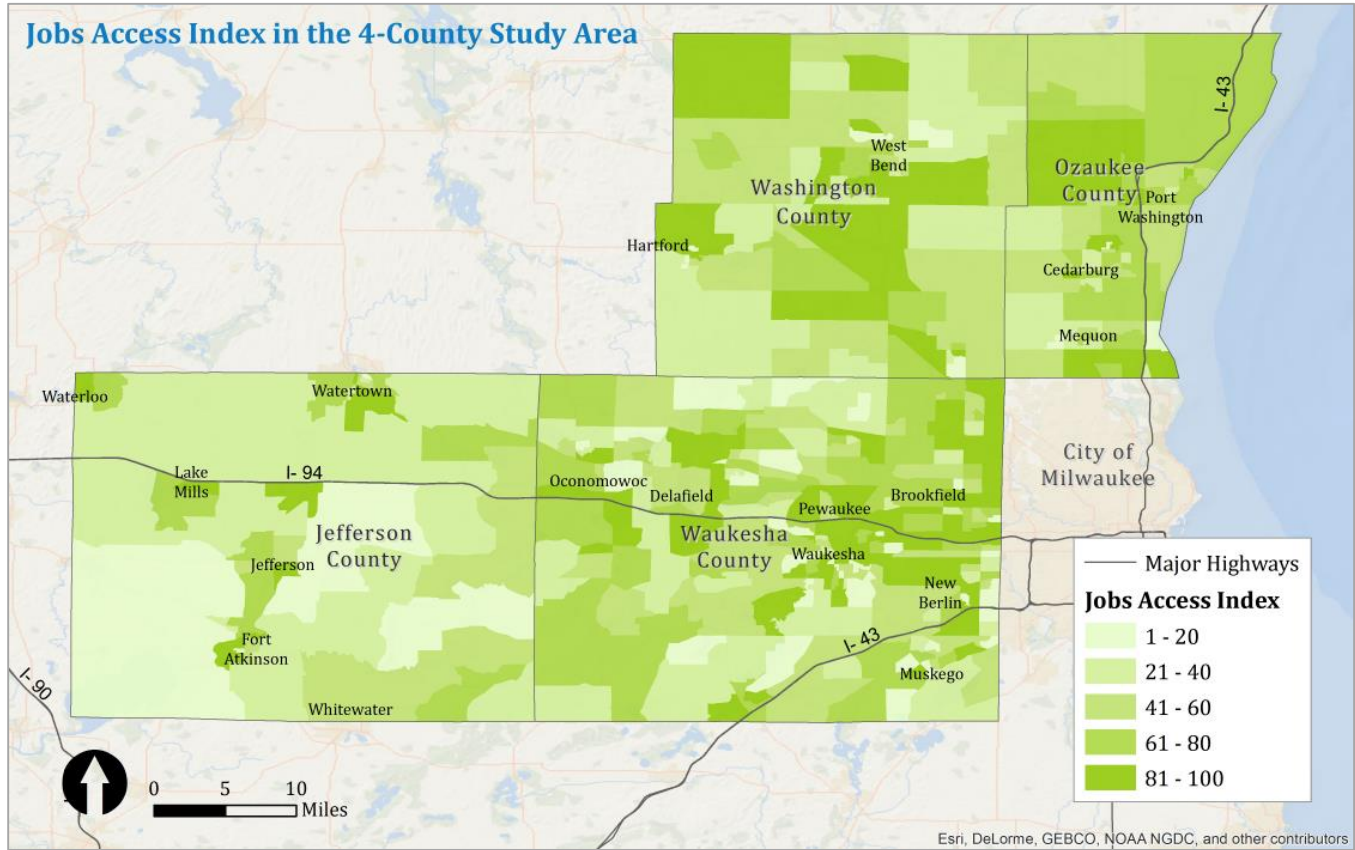
⁴³ HUD also calculates a sixth index that scores access to transit by block group. However, given that HUD's data does not reflect Waukesha Metro Transit bus service, the transit access index is omitted from this analysis.

Brookfield, West Bend, and Hartford. As one would expect, rural areas within the counties tend to have lower access to jobs. This dynamic is especially evident in Jefferson County, where the high scoring areas of Watertown, Waterloo, Lake Mills, Jefferson, and Fort Atkinson are surrounded by low scoring, more rural block groups.

Of all the opportunity indices, the health hazards exposure index shows the most clear geographic pattern. Potential exposure to health hazards is highest in the Waukesha/Pewaukee and Menomonee Falls/Germantown/Mequon areas and recedes moving out from these centers. Northern Washington and Ozaukee Counties, western Waukesha County, and all of Jefferson County face less exposure to potential environmental toxicity than do the more urban areas located closer to the City of Milwaukee.







Land Use & Zoning

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact their respective jurisdictions. For example, the decision to develop a parcel of land for a shopping mall will not only influence the value and use of surrounding property, but will also impact future traffic and environmental decisions as well (i.e. intensive commercial use will increase traffic flow and large impervious parking lots will increase storm water runoff). For this reason, “[t]he land-use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”⁴⁴ Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice.

The following sections will explore (I) how Wisconsin state law impacts local land use and zoning authority and decision-making; (II) housing affordability and fair housing impediments within the Study Area (as identified by *A Regional Housing Plan for Southeastern Wisconsin: 2035* prepared by the Southeastern Wisconsin Regional Planning Commission in 2013); and (III) fair housing issues faced by persons with disabilities within the Study Area as a result of state laws, construction codes, accessibility requirements, and other local powers.

Overview of Wisconsin Zoning and Land Use Laws

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in conjunction with comprehensive plans. Courts have long recognized the power of local governments to control land use, and the State of Wisconsin authorizes local counties, cities, villages, and towns to regulate land use and zoning within their respective jurisdictions through various state zoning enabling statutes.

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Local zoning regulations in Wisconsin fall under two types: general regulations and special-purpose regulations (e.g., regulations related to shorelands, floodplains, wetlands, agricultural lands, and other special concerns). Zoning laws regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map; define categories of permitted and special approval uses for those districts; and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions can also expressly prohibit certain types of uses within zoning districts. In this way, local ordinances may define the type and density

⁴⁴ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

of housing resources available to residents, developers and other organizations within certain areas, and as a result influence the affordability of housing.

Under Wisconsin's zoning enabling statutes, the responsibility for administering a local zoning ordinance is divided between the local legislative body (i.e., County Board of Supervisors, City or Common Council, Village Board of Trustees, or Town Board), the plan commission, and the board of appeals/adjustment ("BOA"). Permitted uses are those allowed as a matter of right in a zoning district and may be authorized by the zoning administrator or building inspector with a simple permit. For a use not expressly permitted by right, a property owner may seek special approval through a conditional use, variance, or zoning amendment. Conditional uses are identified in the zoning ordinance district regulations and may be allowed if they meet certain standards listed in the zoning ordinance following the public hearing process. In Wisconsin, variances come in two types: use variances and area variances. Use variances allow a property owner to use a property in a manner that is not allowed by the zoning ordinance. Area variances allow a property owner to deviate from a dimensional requirement, such as a building setback or height limitation. The local BOA determines whether to grant a variance request based on the criteria outlined in state statutes and local ordinances.

Counties and Towns

In Wisconsin, the general zoning authority of counties is limited. County zoning does not apply to lands inside the jurisdictional limits of incorporated cities and villages. Counties may adopt zoning ordinances which apply to unincorporated (town) lands within their boundaries, provided the town board adopts the county ordinance. (Wis. STAT. § 59.69(5)). A town in which the county ordinance is in effect also may petition the county for an amendment to the zoning map or ordinance text (§ 59.69(5)(e)(1)). Towns have authority to disapprove most amendments to a county zoning ordinance. For instance, individual towns may veto a zone change (map amendment) if the proposed change falls within the town boundaries. In the case of county zoning ordinance text amendments affecting multiple towns, a majority of affected towns may prevent a general amendment from taking effect by filing a disapproving resolution with the county clerk within a specified time period. Once under county zoning, a town may not adopt its own zoning even with county approval, and may not withdraw unless the county adopts a comprehensive revision (§ 59.69(5)(d)). A comprehensive revision is "a complete rewriting of an existing zoning ordinance which changes numerous zoning provisions and alters or adds zoning districts" accomplished by a single ordinance.

Under Wisconsin Law, ((§ 60.62(3)), in counties having a county zoning ordinance, no town or county zoning ordinance or amendment of a zoning ordinance may be adopted under this section unless approved by the county board. With regard to a town that is located in a county that has a population exceeding 380,000; is located adjacent to a county that has a population exceeding 800,000 and where the county in which the town is located has a zoning ordinance in effect on

January 1, 2013, the town may not adopt or amend a zoning ordinance under this section without county board approval.

A town may adopt its own zoning ordinance in one of two ways. Where county zoning does not already exist, a town board may petition the county board to adopt a county ordinance. If, within one year, the county board has not passed such an ordinance, the town board is free to adopt its own ordinance. (§ 60.61). Or, the town board may adopt village powers and pass a town general zoning ordinance under the procedures available to cities and villages with county board approval of the ordinance and any later amendments. (§ 60.62). In such cases, ordinance administration and enforcement are a town responsibility.

The requirements and procedures for regulating subdivisions (the division of land parcels into smaller parcels for sale and development) provided under the Wisconsin statutes are different from the statutory requirements for zoning. For example, towns do not need county approval to adopt subdivision regulations. Likewise, counties do not need town approval for county subdivision regulations.

In contrast to Wisconsin counties' limited general zoning authority, counties also are vested by the state with special purpose zoning authority for management of floodplains (§ 87.30), shorelands (§ 59.692), agricultural preservation (§ 91.71), and airport protection (§ 114.136). Shoreland, floodplain, and airport protection zoning applies in unincorporated areas and does not require approval of town boards to be in effect. Counties also may zone county-owned land without town approval.

Cities and Villages

Cities and villages may adopt general zoning which applies to lands within their municipal boundaries without needing the consent of the county (WIS. STAT. § 62.23(7)). Cities and villages also may adopt extraterritorial zoning ("ETZ") which applies to surrounding unincorporated areas, either a 3-mile (for populations of 10,000 or more) or a 1.5-mile extent of zoning control, if the proper cooperative steps with the adjoining town are followed. (§ 62.23(7a)). The ETZ powers must be exercised by a joint extraterritorial zoning committee that includes members from affected towns. This allows a city or village to exercise land use control over new development that otherwise might be incompatible with its future growth and makes regional planning easier. Administrative and enforcement roles for the ETZ may be negotiated between the city/village and the town.

Cities must adopt floodplain zoning that applies to floodplain lands within their boundaries, and they also may adopt airport protection zoning. Cities and villages with wetlands of 5 acres or greater in shoreland areas also are required to zone for them. If a city or village does not adopt the required wetland ordinance, the Department of Natural Resources (DNR) may adopt an ordinance for the respective village or city.

Nonconforming Structures and Uses

Pursuant to Wisconsin's Nonconforming Structure Law (2005 Wis. Act 81; 2011 Wis. Act 170), the Wisconsin legislature significantly constrained the authority of local municipalities to prohibit or limit the rehabilitation or expansion of nonconforming structures. A nonconforming structure is defined as: "A dwelling or other building that existed lawfully before the current zoning ordinance was enacted or amended, but that does not conform with one or more of the development regulations in the current zoning ordinance." Generally, local ordinances often place limitations on the ability to repair, maintain, replace and expand nonconforming structures in an effort to phase out nonconforming structures and bring the parcel in compliance with current zoning regulations. However, under current state law, local governments may not prohibit nonconforming homes and structures from being rebuilt if destroyed by natural disaster and local ordinances may not prohibit or limit the value of maintenance, repairs, and remodeling of nonconforming homes and buildings. In 2009, the DNR updated the state's shoreland zoning regulations (Wis. Admin. Code Ch. NR 115) to allow for unlimited maintenance and repair of nonconforming principal structures and more flexibility regarding expansions depending on how close the structures are located from the water. In contrast to nonconforming structures, the state statutes and local ordinances place greater limitations on a property owners' ability to expand, alter or reconstruct a nonconforming use, prohibiting nonconforming uses from expanding and permitting no more than 50% of the building's assessed value from being structurally repaired or altered.

Comprehensive Planning Law

Wisconsin's Comprehensive Planning Law (Wis. Stat. § 66.1001 (1999)), adopted in 1999 and amended periodically, provides a framework for the adoption and implementation of comprehensive plans by counties, cities, villages, and towns and by regional planning commissions to help guide land-use planning and zoning decisions. The Comprehensive Planning Law ("CPL") does not expressly mandate that local municipalities adopt a comprehensive plan. However, beginning on January 1, 2010, if a local government enacts, revises, updates, or otherwise amends a general zoning, shoreland/wetland zoning, subdivision, or official mapping ordinance, the ordinance must be consistent with that municipality's comprehensive plan. (Wis. Stat. § 66.1001(3)). Therefore, by implication, most local governments will adopt a comprehensive plan in accordance with the CPL as a prerequisite to adopting or amending a local zoning/land use ordinance.

The CPL defines nine elements that must be addressed in a municipality's comprehensive plan: issues and opportunities; housing; transportation; utilities and community facilities; agricultural, natural, and cultural resources; economic development; intergovernmental cooperation; land use; and implementation. The CPL also details land use regulations that must be consistent with a comprehensive plan beginning in 2010, and lists mandatory public participation procedures for adopting a comprehensive plan. A comprehensive plan is not itself a regulation but "a guide to the physical, social, and economic development of a local governmental unit."

The housing element of a comprehensive plan must identify “a range of housing choices that meet the needs of persons of all income levels and of all age groups and persons with special needs, policies and programs that promote the availability of land for the development or redevelopment of low-income and moderate-income housing. . . .” (WIS. STAT. § 66.1001(2)(b)). The state’s planning guide for the housing element, *Housing Wisconsin: A Guide to Preparing the Housing Element of a Local Comprehensive Plan*⁴⁵, recommends various implementation tools for meeting this standard. The planning guide encourages local governments to amend building, zoning, and subdivision ordinances to permit smaller minimum lot sizes and setbacks, mixed-use developments, zero-lot line housing, cluster and conservation developments, accessory apartments, inclusionary zoning, smaller impact fees, and simplified permitting processes. These measures could go a long way in fostering housing affordability and opportunity, and complement HUD’s requirement that its entitlement communities affirmatively further fair housing.

The CPL encourages coordinated planning and regional approaches to land use issues between local jurisdictions, but does not require consistency between individual plans. One criticism therefore, is that due to the relationship between counties and their respective towns, a county and town may disagree about future planning uses of particular lands within the town and their respective comprehensive plans will reflect the inconsistency. Towns are not required to attain village powers to adopt a comprehensive plan. However, the town may need village powers to carry out the actions called for in the plan (i.e. the town may need village powers before it can adopt a zoning ordinance under § 60.62 to implement and enforce its plan strategies). In a county with an adopted comprehensive plan and a zoning ordinance, land use decisions by the county with respect to unincorporated areas will be consistent with the comprehensive plan. Therefore, it is important that a town comprehensive plan be consistent with the adopted county plan.

Intersection of Local Zoning with Federal and State Fair Housing Laws

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., Wisconsin Open Housing Law (WOHL), Fair Housing Act (FHA), Americans With Disabilities Act (ADA), constitutional due process and equal protection). Fair housing laws do not preempt local zoning laws, but do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. And even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies that protect and advance fair housing choice for all.

Similarly, the WOHL obligates cities, villages, towns, and counties to assist in the prevention or removal of all housing discrimination. While it does not define specific actions local governments

⁴⁵ Available at http://www.doa.state.wi.us/Documents/DIR/Comprehensive%20Planning/Element-Guides/housing_guide_2.pdf

must take to prevent or remove housing discrimination within their jurisdictions, state law does recommend that local governments enact anti-discrimination housing ordinances, and provides that such an ordinance may be “more inclusive in its terms or in respect to the different types of housing subject to its provisions” than the protected classes and types of housing protected by the WOHL alone. (§ 66.1011(2)).

Housing Affordability and Fair Housing Choice Issues Identified by: A Regional Housing Plan for Southeastern Wisconsin: 2035

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include the following:

- Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

Our research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The following narrative is not designed to assert whether a specific municipality’s zoning and land use codes create a per se violation of the FHA or HUD regulations, but to highlight areas where zoning and land use ordinances within the Study Area may otherwise jeopardize the spirit and intent of fair housing protections and HUD’s AFFH standards for its entitlement communities.

Due to the number of municipalities within the Study Area and cost and time constraints, individual zoning and land use ordinances within the Study Area were not independently reviewed. Rather, the issues and recommendations identified below are drawn from an extensive and detailed housing planning document titled *A Regional Housing Plan for Southeastern Wisconsin 2035*.

The Southeastern Wisconsin Regional Planning Commission (“SEWRPC”) is the planning agency for the seven-county Southeastern Wisconsin Region, which includes the counties of Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha, and the cities, villages, and towns therein (the “Region”). On March 13, 2013, the SEWRPC adopted and published an updated

housing planning document titled *A Regional Housing Plan for Southeastern Wisconsin 2035* (the “Regional Plan”). The advisory committee to the document included representatives from local, county, and State government agencies; housing advocacy organizations; home builders and realtors; and research and policy institutions. The Regional Plan also was reviewed by an Environmental Justice Task Force, which provided input regarding the impact of the Regional Plan’s recommendations on minority and low-income populations and persons with disabilities.

The Regional Plan identifies housing needs and makes recommendations to meet current and probable future housing needs, including a variety of housing options for affordable housing for residents of all income levels and age groups and persons with disabilities. The data and inventory information related to housing, demographics, employment, land use, transportation, and zoning regulations contained in the 900+ page Regional Plan are provided to the Region as a planning framework for the preparation of local comprehensive plans. Although the Region accounts for a relatively small physical portion of the State (5% of the total area), it contains about 36% of the total population of Wisconsin, about 36% of all jobs in the state, and approximately 37% of the total equalized property value in the state. Accordingly, the housing problems identified and the recommended solutions are significant not only to the Region but to the welfare of all of Wisconsin.

The Regional Plan’s Findings

In drafting the Regional Plan, the SEWRPC reviewed community comprehensive plans, zoning and subdivision ordinances, and policies regarding preferred housing types/mix ratios throughout the Region to identify regulations impacting residential densities, housing structure types, and housing unit sizes. Each of the cities and villages reviewed had adopted their own zoning codes, 31 towns were under the jurisdiction of county zoning, and 26 towns had adopted their own zoning codes. The Regional Plan also analyzed housing affordability by comparing low and moderate household incomes within the Region with housing development costs (land, site improvement, regulatory/permitting/impact fees, building/construction materials, review regulations, etc.).

HUD guidelines establish that housing costs should not exceed 30% of household income. Currently, 36% of households in the Region pay more than 30% of their incomes for housing, including about 15% of households that spend more than 50% of their income on housing. Over 67% of the households with high housing costs are low- and moderate-income households.

For the time surveyed, the Region’s median annual household income was \$53,879, based on data compiled from the 2005-2009 American Community Survey by the U.S. Bureau of the Census. According to the Regional Plan, minority households in the Region are much more likely than non-minority households to have low incomes. About 41% of minority households have incomes below 50% of the Region median income, compared to about 20% of non-minority households. The Region’s minority residents are concentrated in the central portions of the cities of Milwaukee, Racine, and Kenosha.

a) Minimum lot sizes, minimum floor areas, and maximum densities as an impediment to affordable housing and fair housing choice.

The Regional Plan calculates that for household incomes between 50 and 80% of the Region's median income (\$26,940 to \$43,104), housing affordability for market-rate (nonsubsidized) housing may occur with multi-family housing at a density of at least 10 housing units (apartments) per acre where two-bedroom apartments are permitted to be 800 square feet or smaller. For household incomes between 80 and 135% of the Region median income (\$43,104 to \$72,737), housing affordability for single-family market-rate homes may occur with lots of 10,000 square feet or less and home sizes less than 1,200 square feet. Housing costs at these recommended densities and sizes would meet HUD's 30% guideline. However, the average monthly gross rent charged in the Region in 2008 was \$761, which would not be affordable to a household earning 50 percent of the Region's median income.

The Regional Plan defines high density residential zoning districts as those that allow for a minimum area per dwelling unit of less than 6,000 square feet. The Regional Plan found that most communities that provide urban services, including sanitary sewer service, have a zoning district with a maximum density greater than 7.0 units per acre (high density), and are most likely to support multi-family housing. Medium density residential zoning districts allow for a minimum area per dwelling unit of between 6,000 and 19,999 square feet; and low density residential zoning districts allow for a minimum area per dwelling unit of between 20,000 square feet and 1.49 acres. Overall, the amount of land zoned for higher density residential use decreased between 1971 and 2000 by about 1%, from 64,770 acres to 63,936 acres. Land zoned for medium density residential development decreased by about 24%, from 141,786 acres in 1971 to 107,328 acres in 2000.

The Regional Plan also found that the minimum floor area requirements, which can be beneficial for ensuring safe housing and reducing overcrowding, in many communities exceeds the amount of space that is actually necessary to avoid these housing problems. According to the Regional Plan's data, between 1971 and 2012 the average minimum floor area requirement for a two-bedroom multifamily unit increased by about 6%, from 776 to 825 square feet, and the average minimum floor area requirement for a three bedroom single-family home has increased in the Region by 19%, from 994 square feet to 1,179 square feet. On the other hand, the average household size in the Region decreased from 3.20 to 2.45 persons per household between 1970 and 2010, and is projected to decrease to 2.39 persons per household in 2035. The increase in the required minimum floor area size is therefore not due to changes in household size.

There are municipalities that include residential zoning districts where multifamily housing at medium- to high- densities are permitted by right, and where single-family districts allow minimum lot sizes (10,000 sq. ft. or less) and minimum floor areas (1,200 sq. ft. or less) that meet the Regional

Plan's estimation of affordability.⁴⁶ (*See, e.g.,* the Cities of West Bend and Hartford in Washington County, the City of Waukesha in Waukesha County, and the Cities of Cedarburg and Port Washington in Ozaukee County.) However, a significant number of the Region's zoning codes reviewed do not accommodate the densities, minimum lot sizes, and minimum floor areas recommended by the Regional Plan to make feasible the development of enough affordable housing to meet the current and future affordable housing needs of the Region's moderate- to low-income households. And there are whole communities which either require a conditional use permit for multi-family housing (which may impede development and/or increase the cost of development) or which fully restrict multifamily development. Six community zoning ordinances that allowed multifamily housing in 1971 do not permit such housing in 2012 (the towns of Cedarburg, Fredonia, and Grafton in Ozaukee County, and the towns of Delafield, Mukwonago, and Waukesha in Waukesha County).⁴⁷ As shown, this disproportionately impacts minorities and low-income households who have a greater need for affordable housing.

The Regional Plan's Map 69 shows the communities which do not allow multifamily housing or require a conditional use permit before development. The Regional Plan's Map 71 provides a visual of the sewered communities where residential zoning district minimum lot sizes and/or minimum floor area requirements may restrict affordable single-family housing. Map 72 provides a visual of the sewered communities where maximum density or minimum floor area requirements may restrict affordable multi-family housing.

Of the 146 cities, villages, and towns in the Region, 93 communities provide sanitary sewer service to all or the majority of residents. Of the 93 sewered communities, 44, or only about 47%, include a district in the local zoning ordinance that allows single-family residential development with lot sizes of 10,000 square feet or less and home sizes of less than 1,200 square feet. The remaining 49 sewered communities either require minimum lot sizes larger than 10,000 square feet, do not allow home sizes smaller than 1,200 square feet, or both. Of the 93 sewered communities in the Region, 41, or only about 44%, include a district in the local zoning ordinance that allows multifamily residential development at a density of at least 10 dwelling units per acre and two bedroom dwelling unit sizes of 800 square feet or less. Eight of these communities require approval of a conditional use permit for the development of any multifamily housing, or the development of multifamily housing at a density of 10 or more units per acre. The remaining 51 sewered communities either do not allow multifamily residential development of at least 10 dwelling units per acre, two bedroom dwelling units of 800 square feet or smaller, or both.

⁴⁶ The Regional Plan's Table 51 provides a summary of each zoning ordinance's smallest minimum lot and home size requirements for single family zoning districts, and maximum density and minimum unit size for multifamily zoning districts throughout the Region. Appendix B of the Regional Plan provides the minimum lot sizes and floor areas (minimum sizes for individual housing units) for each residential district in each communities' zoning ordinance. Table 51 and Appendix B are provided as an appendix to this report. Several counties and communities allow planned unit developments (PUDs) or conservation subdivisions in their zoning and/or subdivision ordinances, which may allow smaller lot sizes and/or higher densities than those listed in this table.

⁴⁷ Note that the Town of Grafton has recently adopted a zoning district (RM-1) that allows for multifamily housing.

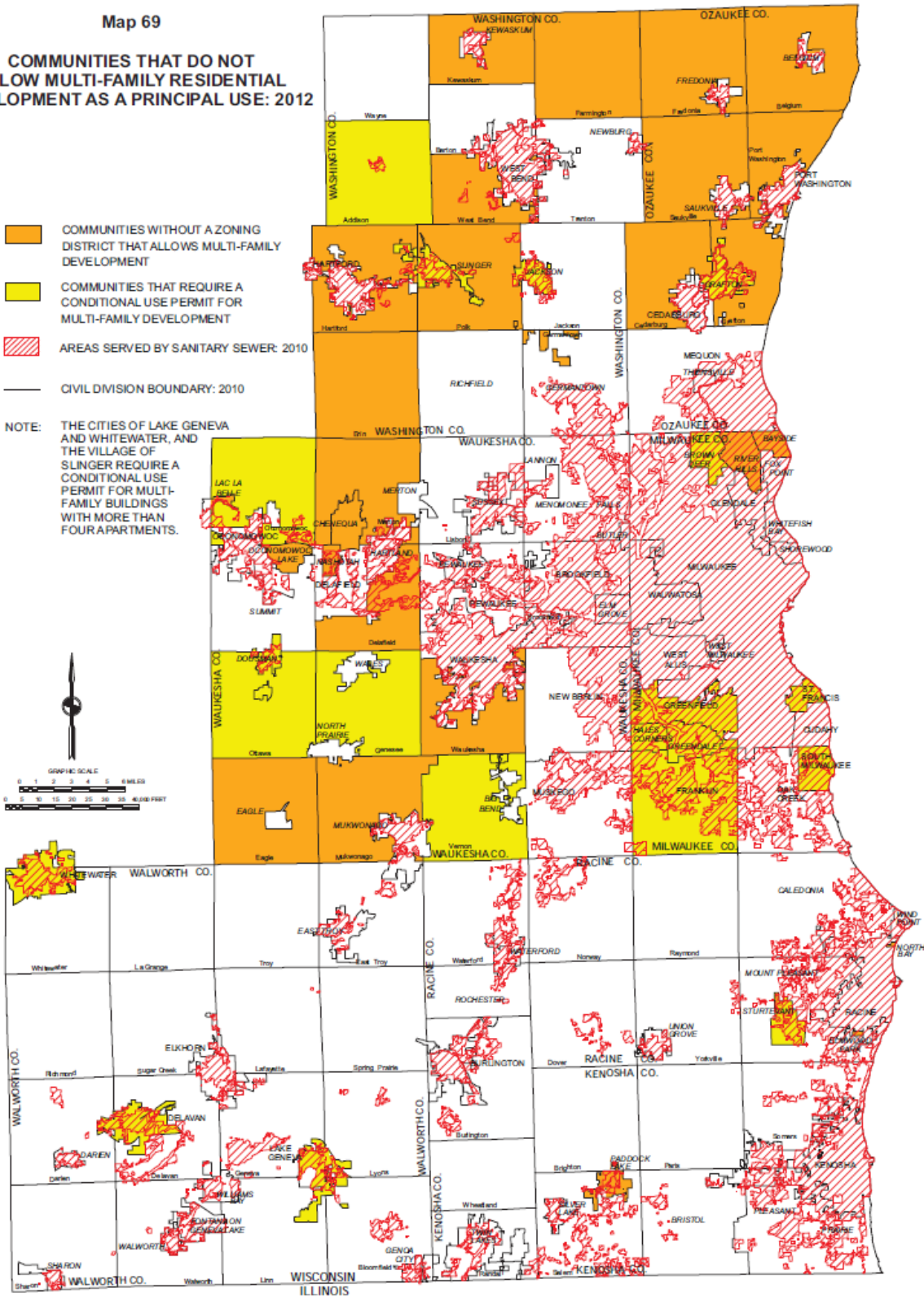
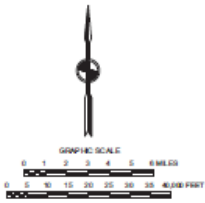
As illustrated, most of the communities that do not allow multi-family dwellings as a principal use or small-lot housing are towns that do not have the infrastructure, such as sanitary sewer, to provide service to more intensive residential uses. The Regional Plan concedes that large-scale multi-family housing would not be appropriate unless adequate public services could be provided. Unsewered communities, which account for a majority of the land area of the Region were not held to the same standards by the Regional Plan, and this is addressed below in the Recommendations section.

Map 69

COMMUNITIES THAT DO NOT ALLOW MULTI-FAMILY RESIDENTIAL DEVELOPMENT AS A PRINCIPAL USE: 2012

- COMMUNITIES WITHOUT A ZONING DISTRICT THAT ALLOWS MULTI-FAMILY DEVELOPMENT
- COMMUNITIES THAT REQUIRE A CONDITIONAL USE PERMIT FOR MULTI-FAMILY DEVELOPMENT
- AREAS SERVED BY SANITARY SEWER: 2010
- CIVIL DIVISION BOUNDARY: 2010

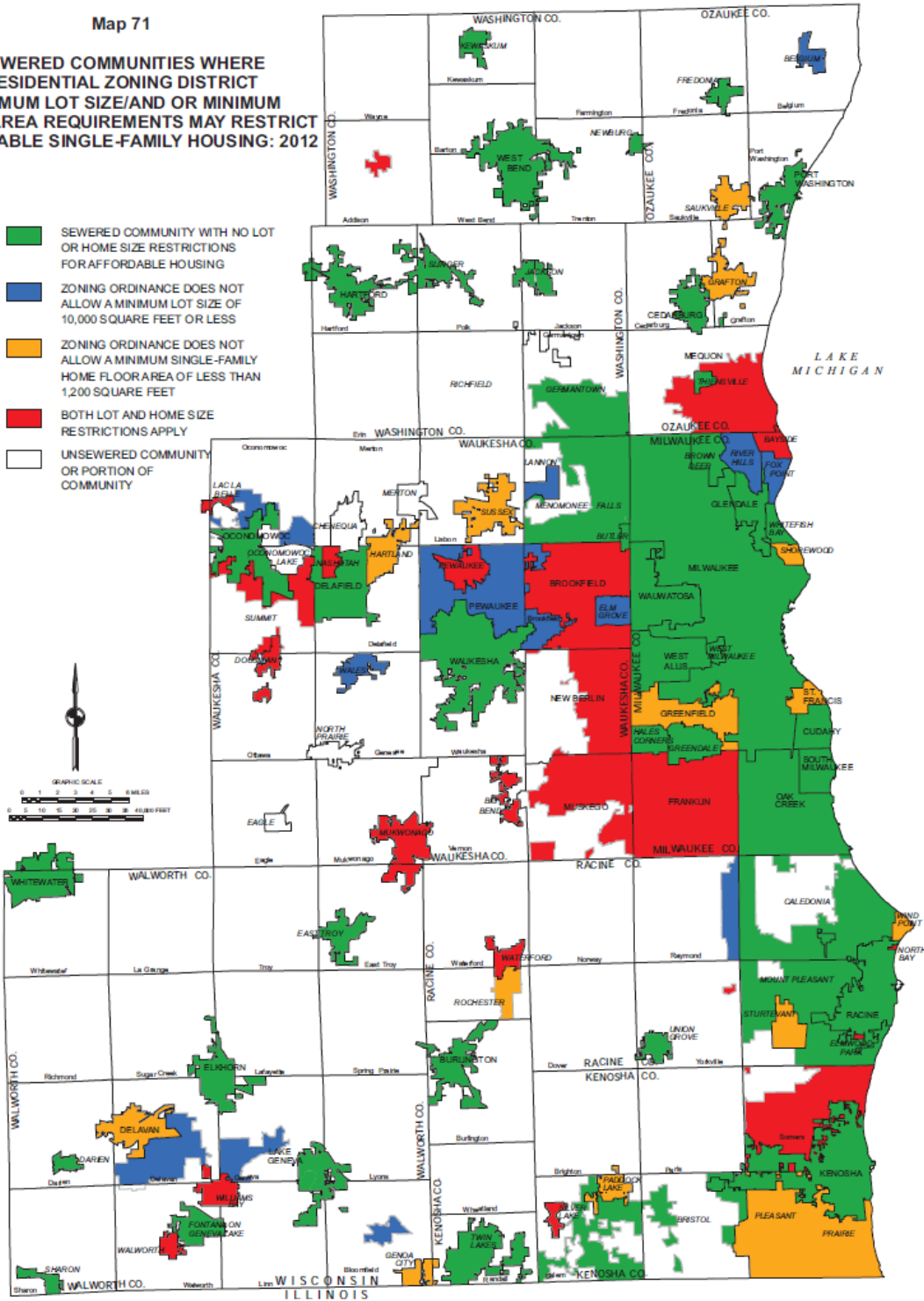
NOTE: THE CITIES OF LAKE GENEVA AND WHITEWATER, AND THE VILLAGE OF SLINGER REQUIRE A CONDITIONAL USE PERMIT FOR MULTI-FAMILY BUILDINGS WITH MORE THAN FOUR APARTMENTS.



Map 71

**SEWERED COMMUNITIES WHERE
RESIDENTIAL ZONING DISTRICT
MINIMUM LOT SIZE/AND OR MINIMUM
FLOOR AREA REQUIREMENTS MAY RESTRICT
AFFORDABLE SINGLE-FAMILY HOUSING: 2012**

- SEWERED COMMUNITY WITH NO LOT OR HOME SIZE RESTRICTIONS FOR AFFORDABLE HOUSING
- ZONING ORDINANCE DOES NOT ALLOW A MINIMUM LOT SIZE OF 10,000 SQUARE FEET OR LESS
- ZONING ORDINANCE DOES NOT ALLOW A MINIMUM SINGLE-FAMILY HOME FLOOR AREA OF LESS THAN 1,200 SQUARE FEET
- BOTH LOT AND HOME SIZE RESTRICTIONS APPLY
- UNSEWERED COMMUNITY OR PORTION OF COMMUNITY

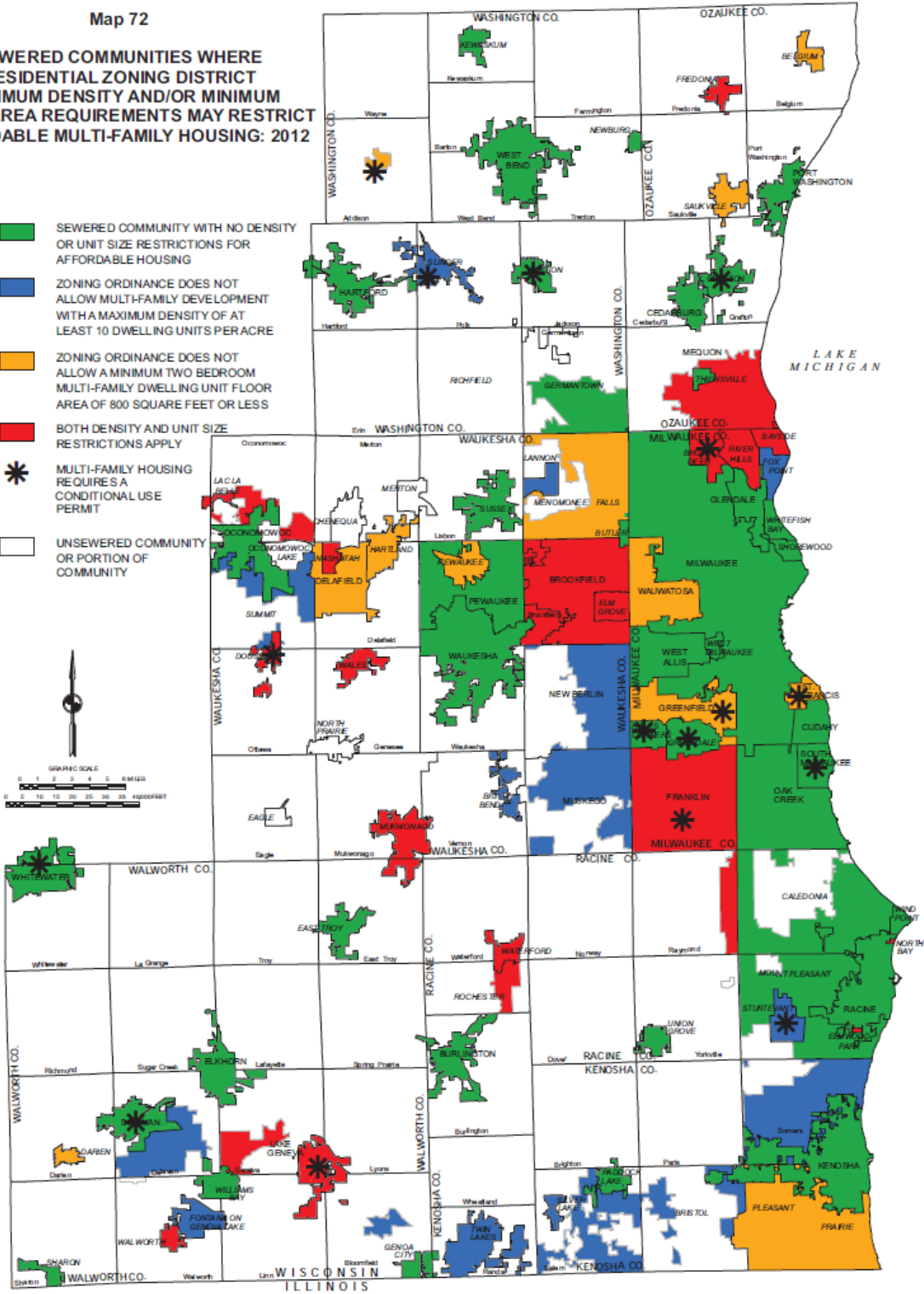
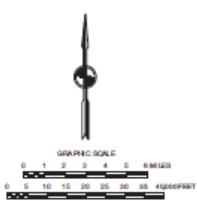


Source: Community Zoning Ordinances and SEWRPC.

Map 72

SEWERED COMMUNITIES WHERE RESIDENTIAL ZONING DISTRICT MAXIMUM DENSITY AND/OR MINIMUM FLOOR AREA REQUIREMENTS MAY RESTRICT AFFORDABLE MULTI-FAMILY HOUSING: 2012

- SEWERED COMMUNITY WITH NO DENSITY OR UNIT SIZE RESTRICTIONS FOR AFFORDABLE HOUSING
- ZONING ORDINANCE DOES NOT ALLOW MULTI-FAMILY DEVELOPMENT WITH A MAXIMUM DENSITY OF AT LEAST 10 DWELLING UNITS PER ACRE
- ZONING ORDINANCE DOES NOT ALLOW A MINIMUM TWO BEDROOM MULTI-FAMILY DWELLING UNIT FLOOR AREA OF 800 SQUARE FEET OR LESS
- BOTH DENSITY AND UNIT SIZE RESTRICTIONS APPLY
- * MULTI-FAMILY HOUSING REQUIRES A CONDITIONAL USE PERMIT
- UNSEWERED COMMUNITY OR PORTION OF COMMUNITY



Source: Community Zoning Ordinances and SEWRPC.

b) Housing mix ratios as an impediment to affordable housing and fair housing choice.

A number of the Region’s municipalities have adopted housing mix ratio policies (or rental percentage limitations) that unreasonably impede the development of affordable and low-income housing. A housing mix policy assigns a target percentage to permitted units of housing types (single family, two-family/duplex, townhomes, multifamily rental, condominium, etc.). Communities with sewer service that have adopted a policy recommending that 70 percent or more of the housing units in the community should be single-family (which are more likely to be owner-occupied as opposed to rental units) include the Villages of Fredonia and Thiensville in Ozaukee County, and the City of New Berlin and Village of Mukwonago in Waukesha County.

Housing mix ratios may impede fair housing choice as they create barriers to housing development based on actual market demands, and fail to take into account regional housing needs or future needs due to changes in demographics, shifting employment opportunities, and aging populations. Government-regulated limitations on the percentage of rental housing or affordable housing types have become the subject of fair housing discrimination complaints.

AI Recommendations

Zoning and land-use laws should accommodate housing and uses that are based on regional needs, and not simply maintain the status quo within an individual jurisdiction. The following recommendations illustrate concrete actions the municipalities could make in terms of their respective zoning and land use regulations to uphold the commitment to furthering fair housing. The issues highlighted below show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and still fulfill the zoning objective of protecting the public’s health, safety, and general welfare.

a) Reduce minimum lot size and minimum floor area requirements and increase density allowances to promote the feasibility of developing affordable housing units.

Many of the surveyed jurisdictions’ zoning and land use standards pose a risk of housing discrimination because they constitute exclusionary zoning that precludes development of affordable or low-income housing. Zoning codes which impose unreasonable residential design regulations (such as high minimum lot sizes, large minimum building square footage, and/or low maximum density allowances) that are not congruent with the actual standards necessary to protect the health and safety of current average household sizes, and which make the development of affordable housing cost prohibitive, may disproportionately impact minorities and low-income households.

The Regional Plan recommends that local governments that provide sanitary sewer and other urban services should amend their zoning codes and comprehensive plans to allow for the development of new single-family and two-family homes on lots of 10,000 square feet or smaller, with home sizes less than 1,200 square feet, to accommodate the development of housing affordable to moderate-

income households. Communities with sewer service also should provide zoning districts for the development of multi-family housing at a density of at least 10 units per acre, and 18 units or more per acre in highly urbanized communities or areas of the Region with higher land costs such as infill and redevelopment, to accommodate the development of housing affordable to lower-income households. To promote fair housing choice, communities should include at least one district that allows single-family residential development of this nature and at least one district that allows multi-family residential development of this nature in their zoning ordinance. Where comprehensive plans identify new and expanding major employment centers outside central cities, additional zoning districts consistent with these standards should be included (“workforce housing”). This would increase housing opportunities for minority and low-income households near employment centers, and would also provide opportunities for minority and low-income households to live in areas with better schools and safer neighborhoods.

b) Expand sanitary sewer services.

In areas not served by a sanitary sewerage system, larger minimum lot sizes and lower densities may be required to meet State and County requirements for private onsite wastewater treatment systems (POWTS). However, communities that do not provide sanitary sewer service should not be given a pass on their obligation to support affordable housing development. A majority of the Region’s land area lies within unsewered communities, and not holding these municipalities to the same standard of providing for affordable and low-income housing dis-incentivizes them from extending sewer and other municipal services to these areas. Program funds should be allocated to infrastructure improvements like sewer service, consistent with adopted Regional Sewer Service Plans, in areas located within a planned sewer service area (see map on page 80) so that more land becomes available that can support higher density multi-family developments and smaller lot sizes for single- and two-family developments.

c) Adopt flexible zoning regulations that permit higher housing densities and multiple housing types.

Some communities in the Region have embraced alternatives to traditional zoning that give the municipality and developers more flexibility in lot configurations, density, housing types, and mixed uses, by focusing on comprehensive plan goals rather than the strict regulatory requirements of the underlying zoning district. Alternative or flexible zoning regulations that have been used by local governments in the Region include Planned Unit Developments (PUD) and Traditional Neighborhood Developments (TND). Floating zones and conservation districts are other types of flexible zoning techniques. The Regional Plan finds that these types of flexible zoning regulations can result in an increase in affordable market based housing units and housing units that are more accessible to the Region’s aging population and persons with disabilities where density restrictions are relaxed.

A PUD is a special type of floating zoning district which generally does not appear on the municipal zoning map until a developer applies and is approved for the designation. Approval may include conditions to encourage clustering of buildings, designation of common open space, and a variety of building types and mixed land uses. A TND incorporates compact, mixed use neighborhoods where residential, commercial, and civic buildings are within close proximity to each other. TNDs can promote more efficient use of land and lower the costs of providing public infrastructure and services. Section 66.1027 of the Wisconsin Statutes requires any city or village with a population of 12,500 or more residents to include provisions that would accommodate TNDs. However, local governments were not required to include TND districts on their zoning map. Rather than adopting TND regulations, several communities include TND design concepts in their PUD regulations. (See Regional Plan, Table 53 and 54.)

A conservation subdivision (or cluster development) typically contains smaller minimum lot sizes than would be required for each home in a conventional subdivision, while maintaining the overall density of development specified by the local comprehensive plan or zoning ordinance. Homes are generally located on a portion or portions of a development site, and the balance of the site is maintained as open space or in agricultural use. As of 2010, only 15 of the 42 communities in the Region that had adopted specific regulations for conservation subdivisions provided density bonuses. For the most part, existing conservation district regulations also fail to provide for a mixture of housing types. While most of the conservation subdivisions in sewerred areas accommodate primarily single-family homes, two of the subdivisions accommodate lots for two-family dwellings, one subdivision includes lots for four-family dwellings, and one includes an area for development of a commercial/office building in addition to lots for single-family homes. (Table 55 of the Regional Plan lists county and local governments that have adopted conservation subdivision regulations and Appendix C includes a summary of those regulations.)

While many of the communities that have adopted PUD, TND, and/or conservation subdivision regulations allow flexible lot design and building placement and smaller minimum lot sizes (which may bring down the total development costs, and, therefore potentially have a trickle-down effect on housing affordability), a significant number do not also make allowance for increased density or required set-asides for affordable or workforce housing or mixed land uses. Local governments should adopt standard density bonuses for affordable and workforce housing and allowances for a mixture of housing types as part of their PUD, TND, and conservation subdivision regulations to strengthen and incentivize these types of flexible zoning developments.

d) Relax limitations on the construction, rental, and occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes).

Municipalities could further bolster how they affirmatively further fair housing by allowing greater flexibility in the types of low-impact alternative types of affordable housing permitted, such as accessory dwelling units in single family districts and mobile/manufactured homes. The use of

accessory structures as dwellings provides private market opportunities to incorporate smaller, more affordable housing units in neighborhoods of opportunity that otherwise would be expensive places to live.

Several communities in the Region allow accessory apartments as a conditional use, but these units are typically limited for use by relatives of the individuals residing in the primary dwelling. This is an unnecessary restriction that limits the usefulness of this type of alternative affordable housing and generally maintains the status quo of the neighborhood in terms of race and national origin status rather than increasing diversity. Mobile homes are permitted in the Villages of Germantown and Jackson in Washington County, but not otherwise widely permitted within the Study Area.

e) Adopt inclusionary zoning provisions.

Waukesha County and the HOME Consortium counties could further bolster how they affirmatively further fair housing by adopting inclusionary zoning provisions and incentives, such as higher density allowances and a waiver or modification of other development standards where certain set-asides are made for affordable housing for moderate and low-income families. To ensure long-term affordability of these units, legal mechanisms such as deed covenants, the preemptive right to purchase, the right to cure a foreclosure, the right to purchase a home entering foreclosure, and requirements of notice of default or delinquency; resale formulas; and monitoring and stewardship partnerships with local housing authorities and nonprofit housing advocacy organizations should be included.

f) Amend zoning and design regulations to better promote flexibility in development and construction costs.

The Regional Plan analyzed housing development costs within the Region and particularly those costs which government regulations directly impact. To lower the cost of development of housing, and in turn make development of affordable housing more feasible, local governments can reduce raw land costs by lowering minimum lot size requirements. They also can help reduce construction costs by lowering minimum home sizes and permitting affordable façade materials and alternative construction methods (such as panelized building process). Local governments also can incentivize the development of affordable housing by reducing permitting fees to the actual cost of review, reducing or waiving impact fees, and reducing time frames for project review and approval for proposed housing that meets the affordability thresholds for lot and home size and densities. In many jurisdictions, multifamily housing requires approval of a conditional use application following the administrative and public review process. This significantly impacts the feasibility of developing affordable multifamily housing.

Analysis of impact on housing for persons with disabilities under Wisconsin law regarding construction codes, accessibility requirements, spacing and density requirements for CLAs, and others identified in the *Regional Housing Plan*.

Congress amended the federal Fair Housing Act ("FHA") in 1988 to add protections for persons with disabilities (and families with children). Congress explicitly intended for the FHA to apply to zoning ordinances and other laws that would restrict the placement of group homes for persons with disabilities. *H.R. Rep. No. 100-711, at 24* (1988), reprinted in *1988 U.S.C.C.A.N. 2173, 2185* (stating that the amendments "would also apply to state or local land use and health and safety laws, regulations, practices or decisions which discriminate against individuals with handicaps"); *see also Hemisphere Bldg. Co. v. Village of Richton Park, 171 F.3d 437, 438 (7th Cir. 1999)* ("the cases hold or assume...that the [FHA] applies to municipalities, and specifically to their zoning decisions"). In addition, the FHA requires accommodation in rules, policies, and procedures if such accommodation (1) is reasonable and (2) necessary (3) to afford persons with a disability the equal opportunity to use and enjoy a dwelling. *42 U.S.C. § 3604(f)(3)(B)*. The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHA. *42 U.S.C. 12131(2)*.

Since the FHA amendments took effect, there has been a significant amount of litigation concerning the power of local governments to exercise control over group living arrangements, particularly for persons with disabilities, through zoning and other land use policies. The FHA is not a zoning statute and does not pre-empt local zoning laws. However, it does prohibit local governments from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons, including individuals with disabilities. If a local government's zoning power is exercised in a way that is inconsistent with the FHA, the federal law will control. For example, the FHA makes it unlawful to treat groups of persons with disabilities less favorably than groups of non-disabled persons; to take action against, or deny a permit, for a home because of the disability of its residents; and to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.

The Department of Justice's Civil Rights Division has focused its enforcement efforts on behalf of persons with disabilities in two major areas: (1) zoning and land use regulations that discriminate against persons with disabilities or impair their fair housing choice, including unreasonably restricting congregate living arrangements (group homes); and (2) accessibility requirements so that housing is accessible to and usable for persons with disabilities. These two areas provide a framework for reviewing Wisconsin state and local laws that impact housing for persons with disabilities.

a) Housing choice for persons with disabilities under Wisconsin state law and local ordinances.

Wisconsin state law does preempt local zoning power regarding certain regulations related to housing for persons with disabilities. Wisconsin law defines a number of different types of group housing arrangements for persons with disabilities requiring supportive services, including an Adult Family Home (AFH), Community Based Residential Facility (CBRF), Nursing Home, and Residential Apartment Complex (RCAC). (*See* WIS. STAT. § 50.01). AFHs, licensed for up to four residents, and CBRFs, licensed for five or more residents, are residential facilities where persons with disabilities may receive care, treatment, or services that are above the level of “room and board” and may include a certain number of hours per week per resident of nursing care.

The state statutes governing the location of group housing arrangements in residential areas are set forth for counties in Sec. 59.69(15); for towns in Sec. 60.63; for cities in Sec. 62.23(7)(i); and for villages in Sec. 61.35 with cross-reference to Sec. 62.23. Under these provisions, CBRFs and AFHs (as well as community living arrangements for children and foster care homes for children) for up to eight residents must be treated as a permitted land use in any single family or two-family zoning district, and those that house up to 15 residents must be treated as a permitted land use in any multifamily zoning district, without the need to obtain special zoning permission. Facilities serving 16 or more persons must apply for special zoning permission in any areas zoned for residential use.

The statutes, however, give local municipalities the authority to limit the number of CBRFs, AFHs, and other group living arrangements within their respective jurisdictions by establishing a 2,500 feet spacing requirement between facilities. Local governments may choose whether or not to enforce the spacing requirement or to reduce it. The state statutes also set forth a capacity standard limiting group living arrangements within a jurisdiction to 25 persons or 1% of the municipality’s population (whichever is greater). And the capacity within each aldermanic district of a municipality shall also not exceed the greater of 25 persons or 1% of the district’s population.

The Department of Health Services (DHS) licenses and regulates group living arrangements for persons with disabilities. Municipalities that are considering special zoning permission for a new facility may request DHS staff to review plans and provide advanced approval or disapproval. Furthermore, local governments may review annually the “effect” a group living arrangement has “on the health, safety or welfare of the residents of the [community].” Local governments are given the power to force the CBRF or AFH to close if it determines the facility “poses a threat.” Procedural requirements for the determination are spelled out by statute, including hearing and notice requirements. Upon such a finding, special zoning permission would be required for the facility’s continued operation. As a check on potentially discriminatory local actions, the law provides that a facility may seek judicial review.

The Department of Justice and HUD take the position, and federal courts that have addressed the issue mostly agree, that spacing and density restrictions are generally inconsistent with the FHA.

Wisconsin's spacing and density ceilings limit the overall aggregate capacity of housing for persons with disabilities even if the need in the community or region is greater than the thresholds.

On a number of occasions, Wisconsin courts have found in the context of legal challenges to a municipality not granting a reasonable accommodation, that the refusal to grant an exception to the spacing requirement is a violation of the reasonable accommodation requirements of the FHA. See *"K" Care, Inc. v. Town of Lac du Flambeau*, 181 Wis.2d 59, 510 N.W.2d 697 (Wis. Ct. App. 1993) (town required to accommodate elderly by granting special exception to state statute imposing 2,500-foot spacing requirement in that proposed extra facility would not adversely affect residential character of neighborhood); *Tellurian U.C.A.N., Inc. v. Goodrich*, 178 Wis. 2d 205, 504 N.W.2d 342 (Wis. Ct. App. 1993) (village violated FHAA by not granting exception to spacing restriction where exception was feasible, practical, and would not entail undue burdens to the village). See also, *U.S. v. Village of Marshall*, 787 F. Supp. 872 (W.D. Wis. 1991) (finding the Village's refusal to grant exception to spacing restriction constituted discrimination under FHA).

In *Oconomowoc Residential Programs, Inc. v. City of Milwaukee*, 300 F.3d 775 (7th Cir. 2002), ORP, a provider of housing and other services for persons with disabilities, applied for an occupancy permit for a community-based residential facility (CBRF) for six adults impaired by traumatic brain injury and/or developmental disabilities. The City refused to issue an occupancy permit, citing a municipal ordinance restricting such homes from operating within 2,500 feet (approximately one half of a mile) of another community living arrangement. ORP applied to the Board of Zoning Appeals (BOZA) for a waiver of the spacing requirement, but neighbors spoke out against permitting the CBRF and the BOZA denied the request. The City expressed concern for the safety of the residents due to the high traffic and lack of sidewalks along the home's street, and stated that, based on the allegations of problems emanating from other ORP facilities, the proposed facility could impose undue costs, expenses, or other burdens on the City.

Plaintiffs then brought suit against the City for violations of the FHA and ADA. The United States District Court for the Eastern District of Wisconsin granted Plaintiffs' motion for partial summary judgment and denied the City's motion for summary judgment. On appeal before the Seventh Circuit, Plaintiffs were required to show under the FHA that the requested accommodation (1) is reasonable and (2) necessary (3) to afford a person with a disability the equal opportunity to use and enjoy a dwelling. (Citing 42 U.S.C. §3604(f)(3)(B)).

The City argued that it had done its fair share of providing community living arrangements and group homes, in part by granting thirty-nine variances to the spacing ordinance, and that the rest of Milwaukee County had many sites available. In response, ORP demonstrated that, because of the 2,500-foot rule, no one could open a group home anywhere in the City of Milwaukee other than in two aldermanic Districts or in nine prohibitively expensive suburbs in Milwaukee County.

The Court found that the Plaintiffs sufficiently established that the accommodation was reasonable and necessary to provide them with an equal opportunity to enjoy housing in a residential

community in Milwaukee. The City failed to put forth evidence regarding the purported undue financial and administrative burdens that would result from ORP's history of problems operating other group homes. The Court noted that cities may not rely on the anecdotal evidence of neighbors opposing a group home as evidence of unreasonableness or base a denial of a variance on blanket stereotypes about persons with disabilities rather than particularized concerns about individual residents such as public safety concerns or concerns for the safety of the residents themselves.

Having determined that the City failed to provide a reasonable accommodation, the Seventh Circuit affirmed the district court's grant of partial summary judgment to the Plaintiffs and declined to address whether the FHA or ADA preempts the spacing ordinance.

In an earlier district court opinion, *Oconomowoc Residential Programs v. City of Greenfield*, 23 F. Supp. 2d 941 (E.D. Wis. 1998), the federal district court for the Eastern District of Wisconsin did address whether Wisconsin's spacing and capacity laws for housing for persons with disabilities are preempted by federal fair housing laws, and ruled that the state laws are preempted by the FHA and ADA.

Recommendations

Despite this precedent, Wisconsin's spacing and capacity laws as applied to housing for persons with disabilities have not been repealed. If followed and enforced by local zoning authorities, distance and capacity standards may limit the number of community living arrangements and thus the overall aggregate availability of housing for persons with disabilities, even where the need in the community is greater than the thresholds.

Although plaintiffs will likely win any legal challenge against a municipality that enforced the spacing or capacity limitations, the restrictions create a time-consuming and expensive hurdle to overcome for housing providers and residents in need of supportive housing. Additionally, many persons within the protected class may not have the sophistication, resources, or adequate legal representation to challenge such discriminatory limits.

To avoid discrimination on the basis of disability and affirmatively further fair housing choice for persons with disabilities, communities within Waukesha County and the other HOME Consortium counties should repeal any existing ordinances that seek to enforce the spacing requirements against persons with disabilities or other protected classes (i.e. foster homes under familial status protection), and expressly provide for AFHs, CBRFs, and other group/community housing for persons with disabilities as permitted uses within all residential districts.

Rather than imposing spacing and density restrictions, a local government that believes a particular area within its boundaries has its "fair share" of group homes, could offer incentives or suggestions to providers to locate future homes in other neighborhoods.

Another area for improvement would be for each jurisdiction to adopt a reasonable accommodation ordinance for making requests for reasonable accommodation/ modification in land use, zoning and building regulations, policies, practices and procedures. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices and procedures or even waiving certain requirements, when it is necessary to eliminate barriers to housing opportunities. However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation and most local governments and zoning authorities fail to provide a clear and objective process.

Often municipalities handle the mandate to provide a reasonable accommodation through their variance or conditional use permit procedures. However, the purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation. To obtain a variance, an applicant must usually show special circumstances or conditions applying to the land, building, or use that are preexisting and not owing to the applicant. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents of the housing. Whereas simple administrative procedures may be adequate for the granting of exceptions, the variance and conditional use permit procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities may impact the outcome. Adopting a reasonable accommodation ordinance is one specific way to address barriers in land use and zoning procedures and would help municipalities more fully comply with the intent and purpose of fair housing laws.

Model ordinances are available that have been approved by HUD or the DOJ as part of fair housing settlement or conciliation agreements. These include a standardized process and gives the director of planning, or her designee, the authority to grant or deny reasonable accommodation requests without the applicant having to submit to the variance or conditional use permit or other public hearing process.

b) Accessibility requirements and the need for more accessible units for persons with disabilities.

Federal and State laws overlap to set forth minimum accessibility design and construction standards that apply to multi-family residential structures, which are intended to decrease barriers to housing opportunities for persons with disabilities.

Federal accessibility standards are promulgated under the FHA, Section 504 of the Rehabilitation Act, the ADA, and the Architectural Barriers Act. The FHA's accessibility requirements apply to all multi-family buildings of four or more units ready for first occupancy after March 13, 1991. In

buildings of four or more units with an elevator, all units must be accessible. In buildings without an elevator, all units on the ground floor must be accessible. Entrances and common areas must also be accessible. HUD periodically publishes design manuals that provide technical guidance to implementing the accessibility requirements of the FHA.

State accessibility requirements are codified in the Wisconsin Open Housing Law (WIS. STAT. §106.50), WIS. STAT. § 101.132 (accessibility requirements for covered multifamily housing), and the Wisconsin Administrative Code - Uniform Dwelling Code (“UDC”), SPS 320 – 325 (applies to one- and two-family dwellings). The UDC cross-references ICC/ANSI A117.1 accessibility standards. The UDC applies uniformly throughout the state, and local governments may not adopt a more or less stringent code. The UDC is typically enforced by a local government’s designated building inspector. State regulations apply to multi-family units in buildings with three or more units that were first ready for occupancy on or after October 1, 1993. State regulations apply only to grade level units in buildings without an elevator. Buildings originally constructed prior to October 1, 1993, also may be subject to accessibility standards if they undergo substantial rehabilitation or remodeling after that date. If 25 - 50% of the interior square footage is remodeled, units or areas included in the remodeling must be made accessible. If more than 50% of the interior square footage is remodeled, regardless of when the housing was first occupied, then all units in buildings with an elevator and all ground floor units in buildings without an elevator must be made accessible.

To be considered accessible, covered multi-family housing, including remodeled multifamily housing, must comply with the applicable ANSI (American National Standards Institute) guidelines, or other guidelines that provide an equivalent or greater level of accessibility. Required design features include: an accessible route to and at least one accessible entrance into each building; accessible public and common use areas; interior and exterior doors and interior passageways that are sufficiently wide to accommodate wheelchairs; light switches, electrical outlets, circuit controls, thermostats, and other environmental controls located in accessible locations; bathroom walls are reinforced to allow installation of grab bars; and single lever door controls and plumbing fixtures on request of the renter. Additional accessibility requirements beyond those set forth in the Statutes are required for projects that receive financing through HUD or apply for Low Income Housing Tax Credits through WHEDA.

The Regional Plan identified, as a component of the region’s housing analysis, the need for more units of accessible housing for persons with disabilities. For example, there are more persons with ambulatory disabilities in each of the Region’s Counties than multi-family housing units constructed between 1990 and 2009, which could result in an inadequate supply of accessible dwelling units. (See Regional Plan, Table 159). And communities that lack public transit service and/or multifamily housing (especially those that expressly prohibit multifamily housing) may further limit options for persons with disabilities who may wish to reside in those communities.

Although there is no definitive data on the number of accessible housing units in the Region, the Regional Plan estimates that up to 61,640 housing units in the Region may be accessible to persons

with mobility disabilities based on estimates of the number of multifamily units constructed since 1991 and units constructed using Federal subsidized housing and LIHTC funds which were required to meet Federal and State accessibility and construction laws. Community living arrangements (CLA) and nursing homes provide accommodation for approximately 25,000 persons in the Region, some of whom are elderly or persons with disabilities. According to 2010 ACS data, about 169,000 households, or about 21 percent of households in the Region, included at least one person with a disability. Moreover, as the number and percentage of persons aged 65 and older is expected to steadily increase over the next 20 to 30 years (from about 13% in 2000 to 20% in 2035), the expected incidence of disability can be assumed to increase as populations age. When compared to the estimated amount of accessible housing, the numbers indicate a need for additional accessible housing, particularly in light of the expected increase in persons with disabilities related to the aging population.

Recommendations

While private housing developers are responsible for designing and constructing accessible units, local permitting and inspection authorities have a significant role to play in monitoring compliance and making development of more accessible units more feasible.

The Regional Plan recommends that jurisdictions provide a greater level of accessibility than what is statutorily required (a way to affirmatively further fair housing) by adopting or promoting construction design concepts such as universal design (UD) and Visitability standards and features in all new housing, including consideration of providing density bonuses or other incentives to encourage such housing. Examples of these design concepts include: low- or no-threshold entrance to the home with an overhang, lever-style door handles, no change in levels on the main floor, use of handrails for all steps, wider doors, and at least one accessible half bath on the main floor. According to 2010 ACS data, about 169,000 households, or about 21 percent of households in the Region, included at least one person with a disability. Heightened design standards such as these may especially help meet this growing Regional need for accessible housing.

Federal and State accessibility regulations for multi-family housing units are largely intended to address the housing needs of persons with mobility impairments, but jurisdictions should look beyond just accessibility requirements that relate mostly to wheelchair accommodation. These standards may not meet the accessibility needs of persons with other types of disabilities such as a sensory disability, hearing difficulty, vision difficulty, cognitive difficulty, self-care difficulty, independent living difficulty, or other disability that is not physical in nature. Persons with these types of disabilities may require a greater level of accessible design features or other services than required by fair housing laws.

Housing affordability is also a concern to persons with disabilities, whose median annual earnings are about half that of a person without a disability. The previously discussed recommendations for

the development of more multifamily and affordable housing would help persons with disabilities obtain housing that would be both accessible and more affordable.

Finally, zoning and municipal codes could be improved by directing builders, residents, and tenants to the specific provisions of the Wisconsin Statutes and Administrative Code relating to building, construction, and accessibility code standards.

Home Mortgage Disclosure Act (HMDA) Analysis

Homeownership is vital to a community's economic well-being. To live up to the requirements of fair housing law, all persons must have the ability to live where they want and can afford to. Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The task in this Home Mortgage Disclosure Act (HMDA) analysis is to determine the degree to which the housing needs of study area residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2012 HMDA data consists of information for 15.3 million home loan applications reported by 7,400 home lenders, including banks, savings associations, credit unions, and mortgage companies.⁴⁸ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and additional information about loan applicants including sex, race, ethnicity, and income.

The source for this analysis is HMDA data for Waukesha, Jefferson, Ozaukee, and Washington Counties for the years 2010 through 2012⁴⁹, which includes a total of 21,718 home purchase loan application records. Within each HMDA record some of the data variables are 100% reported: "Loan Type," "Loan Amount," "Action Taken," for example, but other data fields are less complete. For the study area, for example, 3.5% of the records lack complete information about applicant and co-applicant sex, and 5.6% lack complete data regarding race and ethnicity. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race, and/or ethnicity.

Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the analytical results.

⁴⁸ Federal Financial Institutions Examination Council, "Federal Financial Examination Council Announces Availability of 2012 Data on Mortgage Lending," September 18, 2013.

⁴⁹ Loan records were examined for a three year time frame in order to include a greater number of observations, thereby allowing stronger conclusions about approval rates, denial rates, and reasons for denials.

There is no requirement for reporting reasons for a loan denial, and this information was not provided for 13.9% of loan denials in the study area. Further, the HMDA data does not include a borrower's total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data.⁵⁰ Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution's compliance with the fair lending laws.

Loan Approvals and Denials by Applicant Sex

The 2010-2012 HMDA data for the study area includes complete information about applicant and co-applicant sex and household income for 20,569 of the total 21,718 loan application records (94.7%). About one-sixth of applications (17.3%) were by female applicants, one-quarter (24.2%) by male applicants, and the remaining majority by male/female co-applicants (58.6%). The table on the following page presents a snapshot of loan approval rates and denial rates for low, moderate, and upper income applicants by sex.⁵¹ Note that denial rates are not simply the complement of approval rates because the "Loan Action" variable allows other outcomes including application withdrawal by the applicant and file closure for incompleteness.

Regardless of gender, loan approval rates were lowest and denial rates highest for low income applicants. Within that category, female applicants had the highest approval rate at 74.6%, compared to 71.3% for male applicants and 65.8% for male/female co-applicants. Male/female co-applicants had a relatively small number of applications in this category (275 out of 1,663), possibly reflecting their greater likelihood of being dual income households and thus, having incomes above 50% of the area's median.

In both the moderate and high income brackets, male/female co-applicants made up the largest share of applicants and had the highest approval rates (85.5% and 86.4%, respectively). Approval rates for females lagged by 2.1 percentage points at moderate incomes and 2.3 percentage points at high incomes. In both of these income categories, male applicants had the lowest approval rates and highest denial rates. At the moderate income level, approval rates for male applicants were 2.0 percentage points below those for female applicants and 4.1 percentage points below those for male/female co-applicants. This disparity increased to 3.8 and 6.1 percentage points, respectively, for high income applicants.

⁵⁰ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. "The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act." Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

⁵¹ The low income category includes applicants with a household income below 50% of area median family income (MFI). The moderate income range includes applicants with household incomes from 50% to 120% MFI, and the upper income category consists of applicants with household incomes above 120% MFI.

Overall, home purchase loans for male/female co-applicants are 1.05 times more likely to be approved than for female applicants and 1.07 times more likely than for male applicants. Approval ratings for male/female co-applicants are more strongly correlated with income, showing a 20.6 percentage point increase from low to high income categories, compared to ranges of less than 10 points for male and female applicants.

For each applicant group, denial rates decline as income increases. At low incomes, male/female co-applicants are the most likely to be denied loans (23.3%), while denial rates for females and males are considerably lower (16.9% and 17.2%, respectively). This relationship inverts as incomes increase; in the high income category, female applicants are 1.5 times more likely to be denied loans than are male/female co-applicants and male applicants are 1.6 times as likely to be denied.

Loan Approval and Denial Rates by Sex Four-County Study Area, 2010-2012				
Applicant Income	Female Applicant(s)*	Male Applicant(s)*	Male/Female Co-Applicants	All Applicants
Low Income				
Total Applications	706	682	275	1,663
Approved	74.6%	71.3%	65.8%	71.8%
Denied	16.9%	17.2%	23.3%	18.0%
Withdrawn/Closed Incomplete	8.5%	11.6%	10.9%	10.2%
Moderate Income				
Total Applications	2,274	2,967	4,591	9,832
Approved	83.4%	81.4%	85.5%	83.8%
Denied	9.1%	9.9%	7.7%	8.7%
Withdrawn/Closed Incomplete	7.5%	8.7%	6.8%	7.5%
High Income				
Total Applications	573	1,323	7,178	9,074
Approved	84.1%	80.3%	86.4%	85.4%
Denied	8.4%	9.0%	5.5%	6.2%
Withdrawn/Closed Incomplete	7.5%	10.7%	8.1%	8.4%
All Applicants				
Total Applications	3,553	4,972	12,044	20,569
Approved	81.8%	79.7%	85.6%	83.5%
Denied	10.5%	10.7%	6.7%	8.3%
Withdrawn/Closed Incomplete	7.7%	9.6%	7.6%	8.1%

*Includes single male or female applicant and applications with male/male or female/female co-applicants.

Source: FFIEC 2010, 2011, and 2012 Home Mortgage Disclosure Act Data

Under the provisions of the HMDA, reporting institutions may choose to report the reasons they deny loans to consumers, although there is no requirement to do so. Of the 1,803 loan denials

examined here, reasons are provided in 86.2% of total cases; reporting rates vary little by applicant sex, ranging from 85.3% for female applicants to 86.9% for male/female co-applicants.

The table that follows breaks down outcomes for completed loan applications, including reasons for loan denials by sex. Of applications completed by female applicants, 11.5% were denied; male/female co-applicants were denied in 11.9% of cases; and male applicants in 7.8%. For each applicant group, the three most common denial reasons were the same: debt-to-income ratio, credit history, and collateral. These three factors each relate to the applicant’s long-term ability to repay the loan, rather than short-term availability of cash (for downpayment and closing costs) or incomplete/unverifiable information.

Reasons for Loan Denial by Applicant Sex Four-County Study Area, 2010-2012						
Reasons for Denial	Female Applicant(s)*		Male Applicant(s)*		Male/Female Co-Applicants	
	Count	Share	Count	Share	Count	Share
Completed Loan Applications	3,326	100.0%	11,319	100.0%	4,558	100.0%
Applications Approved	2,945	88.5%	10,440	92.2%	4,015	88.1%
Applications Denied	381	11.5%	879	7.8%	543	11.9%
Denial reason provided**	325	9.8%	757	6.7%	472	10.4%
Collateral	93	2.8%	186	1.6%	98	2.2%
Credit application incomplete	35	1.1%	91	0.8%	60	1.3%
Credit history	79	2.4%	187	1.7%	105	2.3%
Debt-to-income ratio	102	3.1%	199	1.8%	147	3.2%
Employment history	15	0.5%	41	0.4%	35	0.8%
Insufficient cash	12	0.4%	67	0.6%	20	0.4%
Mortgage insurance denied	1	0.0%	18	0.2%	9	0.2%
Other	39	1.2%	86	0.8%	56	1.2%
Unverifiable Information	15	0.5%	53	0.5%	21	0.5%
Denial reason not provided	56	1.7%	122	1.1%	71	1.6%

*Includes applications with a single male or female applicant and applications with male/male or female/ female co-applicants.

**Note that for some denials, multiple reasons were listed. Thus, the sum of individual denial reason counts is greater than the total count.

Source: FFIEC 2010, 2011, and 2012 Home Mortgage Disclosure Act Data

Loan Approvals & Denials by Applicant Race & Ethnicity

The below table disaggregates loan approval rates by race and ethnicity for different levels of income. Complete race, ethnicity, and income data was available for 20,089 loan records, or 92.5% of the 21,718 total records for the study area from 2010 to 2012. The vast majority of loan applicants

were non-Hispanic White (94.1%). Minority applicants included Asians (2.5%), Hispanic (2.2%), Blacks (0.8%), and a small share of other racial groups (0.4%).

Loan Approval and Denial Rates by Applicant Race and Ethnicity Four-County Study Area, 2010-2012						
Applicant Income	Non-Hispanic				Hispanic	Total
	White	Black	Asian	Other*		
Low Income						
Total Applications	1,527	4	25	5	68	1,629
Approved	73.3%	100.0%	60.0%	60.0%	55.9%	72.4%
Denied	16.7%	0.0%	24.0%	40.0%	30.9%	17.4%
Withdrawn/Closed Incomplete	10.0%	0.0%	16.0%	0.0%	13.2%	10.1%
Moderate Income						
Total Applications	9,158	62	186	37	215	9,658
Approved	83.5%	72.6%	79.6%	67.6%	81.4%	83.3%
Denied	9.0%	16.1%	10.8%	13.5%	10.2%	9.1%
Withdrawn/Closed Incomplete	7.5%	11.3%	9.7%	18.9%	8.4%	7.6%
High Income						
Total Applications	8,215	95	330	46	155	8,841
Approved	86.0%	78.9%	81.5%	78.3%	81.3%	85.6%
Denied	6.2%	12.6%	5.5%	4.3%	9.0%	6.2%
Withdrawn/Closed Incomplete	7.9%	8.4%	13.0%	17.4%	9.7%	8.1%
All Applicants						
Total Applications	18,900	161	502	88	438	20,089
Approved	83.8%	77.0%	77.1%	72.7%	77.4%	83.4%
Denied	8.4%	13.7%	12.4%	10.2%	13.0%	8.6%
Withdrawn/Closed Incomplete	7.9%	9.3%	10.6%	17.0%	9.6%	8.0%

*Includes American Indians and Alaskan Natives, Native Hawaiians and Pacific Islanders, and persons of multiple races.

Note: Analysis is based on applicants only and does not include co-applicants.

Source: FFIEC 2010, 2011, and 2012 Home Mortgage Disclosure Act Data

For low-income applicants, loan approval rates ranged from 55.9% for Hispanics to 100.0% for four Black applicants. For all minority groups except African Americans, loan approval rates are below and denial rates are above those of Whites. While the low number of minority applicants in this income range impedes a stronger conclusion on the relationship between race/ethnicity and loan outcomes, a disparity does exist. Taken together, low income minority applicants are 1.7 times as likely to be denied loans than their White counterparts, and only 0.8 times as likely to be approved. Additionally, minority applicants are 1.3 times more likely to withdraw or not complete their applications.

Moderate income applicants had higher approval rates and lower denial rates than the low income group for all races/ethnicities with the exception of African Americans. In the moderate income band, minority applicants had approval rates ranging from 67.6% to 81.4%, compared to 83.5% for Whites. Denial rates ranged from 9.0% for White applicants to 16.1% for Black applicants. Looking at minority applicants in comparison to Whites shows that the former are 1.3 times more likely than the latter to be denied loans; they are also 1.3 times more likely to withdraw or not complete an application, and 0.9 times as likely to be approved for a loan.

At the high income level, approval and denial rates for White applicants show less variation from those of minority applicants. Approval rates ranged from 78.3% to 86.0% and denial rates from 4.3% to 12.6%. At high incomes, minority applicants are 1.2 times more likely than Whites to be denied loans, 1.5 times more likely to withdraw or not complete an application, and 0.9 times as likely to be approved.

Overall, this analysis indicates that, at low and moderate income levels, loan outcomes for Whites were consistently better than for most minority applicants (with the exception of the limited number low income Black applicants). In the high income bracket, there was more variation amongst minority groups in terms of loan approval and denial rates. Denial rates for Asian and “other” applicants were below those of Whites, although all minority groups had lower loan application approval rates than Whites.

The table on the following page identifies outcomes of completed applications and provides reasons for loan denials by race and ethnicity. For each minority group, the distribution of loan denial reasons is compared to that of White applicants (as a reference group). Findings are summarized below:

- Denial reasons were more likely to be provided for minority applicants than for Whites. Reasons for loan denial were not reported in 14.2% of denials to Whites, compared to 9.1% for Blacks, 11.1% for Asians, and 12.3% for Hispanics.
- For White, Asian, and Hispanic loan applicants, the most common reason for denial was debt-to-income ratio, impeding approval of 2.2% of applications completed by Whites, 2.9% of those by Asians, and 4.1% of those by Hispanics.
- Black applicants were denied loans due to debt-to-income ratio in 2.8% of cases; however, credit history and unverifiable information were much more likely to impact applications completed by an African American, leading to denials in 6.2% and 4.8% of cases, respectively. In comparison to Whites, Black applicants were 5.1 times as likely to be denied a loan due to unverifiable information and 3.5 times as likely to be denied due to credit history. They also faced denial due to the inability to obtain mortgage insurance at a much higher rate than Whites (5.6 times).

**Reasons for Loan Denial by Applicant Race and Ethnicity
Four-County Study Area, 2010-2012**

Reasons for Denial	Non-Hispanic					Hispanic	
	White	Black		Asian		Share	Ratio to Whites
	Share	Share	Ratio to Whites	Share	Ratio to Whites		
Completed Loan Applications	17,727	145		484		391	
Applications Approved	90.9%	84.8%	0.93	90.7%	1.00	85.4%	0.94
Applications Denied	9.1%	15.2%	1.66	9.3%	1.02	14.6%	1.60
Denial reason provided*	7.8%	13.8%		8.3%		12.8%	
Collateral	1.9%	2.1%	1.06	1.7%	0.85	2.3%	1.18
Credit application incomplete	1.0%	0.7%	0.72	1.9%	1.95	0.8%	0.80
Credit history	1.8%	6.2%	3.49	0.8%	0.47	4.1%	2.30
Debt-to-income ratio	2.2%	2.8%	1.23	2.9%	1.29	4.1%	1.83
Employment history	0.4%	0.7%	1.55	1.0%	2.32	1.0%	2.30
Insufficient cash	0.5%	0.7%	1.49	0.6%	1.34	1.8%	3.87
Mortgage insurance denied	0.1%	0.7%	5.56	0.2%	1.66	0.5%	4.12
Unverifiable information	0.9%	4.8%	5.09	0.2%	0.22	1.3%	1.35
Other	0.5%	0.0%		0.4%	0.92	1.0%	2.27
Denial reason not provided	1.3%	1.4%		1.0%		1.8%	

*Note that for some denials, multiple reasons were listed. Thus, the sum of individual denial reason counts is greater than the total count.

Source: FFIEC 2010, 2011, and 2012 Home Mortgage Disclosure Act Data

- Asian loan applicants were denied loans at a similar rate to Whites (both in about 9% of cases), and reasons followed a somewhat similar pattern. Notably, however, Asians were twice as likely to be denied due to an incomplete credit application and 2.3 times as likely to be denied due to employment history. Credit history and collateral were less likely to be factors.
- About 15% of loan applications completed by Blacks and Hispanics were denied, a rate that was 1.6 times as high as that of Whites. Top reasons included debt-to-income ratio, credit history, and collateral, which were each more likely to impede Hispanic applicants than Whites. Additionally, mortgage insurance denials were 4.1 times as likely to cause a loan denial for Hispanic applicants as Whites, and insufficient cash was 3.9 times as likely to be a reason.

Loan Actions by Census Tract Minority Percentage

Census tracts often approximate neighborhoods and can provide a convenient measure of the small area effects of loan discrimination. The following table (HMDA Loan actions by Census Tract Minority Percentage) provides the counts and rates of loan actions⁵² for study area census tracts by level of minority population. Note that no census tract had a minority population percentage greater than 40%.

HMDA Loan Actions by Census Tract Minority Percentage Four-County Study Area, 2010-2012						
Tract Minority Percentage	Loan Originated	Approved, Not Accepted	Denied by Financial Institution	Withdrawn by Applicant	Closed Incomplete	Total
Loan Action (Counts)						
0.0%-9.9%	15,057	705	1,607	1,393	228	18,990
10%-19.9%	1,865	54	208	170	38	2,335
20%-29.9%	107	2	21	8	3	141
30%-39.9%	135	10	22	21	2	251
Total	17,164	771	1,858	1,592	271	21,656
Loan Action (Rates)						
0.0%-9.9%	79.3%	3.7%	8.5%	7.3%	1.2%	100.0%
10%-19.9%	79.9%	2.3%	8.9%	7.3%	1.6%	100.0%
20%-29.9%	75.9%	1.4%	14.9%	5.7%	2.1%	100.0%
30%-39.9%	71.1%	5.3%	11.6%	11.1%	1.1%	100.0%
Total	79.3%	3.6%	8.6%	7.4%	1.3%	100.0%

Source: FFIEC 2010, 2011, and 2012 Home Mortgage Disclosure Act Data

⁵² Loan approvals include “Loan Originated” and “Approved but Not Accepted.” “Application Denials by the Financial Institution” was the single category used to calculate Denial Rates. Other loan action categories included “Application Withdrawn by Client” and “File Closed for Incompleteness.”

The categories shaded in green show loans that were approved by a HMDA-reporting loan institution. Many loans were approved and resulted in a mortgage (Loan Originated), although in some cases an application was approved but the applicant decided not to finalize the loan; these are categorized as “Approved But Not Accepted.”

The vast majority of loan applications (87.7%) were for homes in census tracts with minority population shares under 10%, not surprising given the limited level of diversity throughout the study area. One-tenth of loan applications were in tracts with between 10% and 19.9% minority population, and only 331 (1.5%) were in tracts with a minority population share of 20% or more.

Loan approval rates declined somewhat as census tract minority population shares increased above 20%, dropping 4 percentage points between the 10%-19.9% range and the 20%-29.9% range and another 4.8 percentage points to the 30%-39.9% range. Denial rates increased for applications in tracts above the 20% minority population level, but fell at 30% mark, albeit not as low as denial rates for tracts with less than 20% minority residents.

Tracts with minority population shares over 30% also showed a greater likelihood of having loans approved but not accepted by the applicant, or having applications withdrawn by the applicant. Given the relatively low number of applications in that category, however, it is difficult to draw strong conclusions from this data.

Summary of HMDA Analysis

This analysis found differences in loan approvals and denials by sex, race, and ethnicity varied depending on income levels, as outlined below:

- At the low income level, male and female applicants had higher approval rates and lower denial rates than male/female co-applicants. As incomes increased, this relationship reversed: male/female co-applicants with moderate incomes saw loan approval rates that were 2.1 percentage points above those of female applicants and 4.1 points above male applicants. These spreads widen slightly to 2.3 and 6.1 points, respectively, for high income applicants.
- A comparison of loan outcomes by applicant race/ethnicity shows that there is a 14.5 percentage point gap in approval rates between low income White and low income minority applicants. At moderate incomes, Whites are approved loans at a rate that is 10.9 percentage points above that of Black applicants, 3.9 percentage points above Asians and 15.9 percentage points above other minorities. These gaps are reduced as incomes increases, but a disparity remains.
- Common reasons for loan denials were debt-to-income ratio, collateral, and credit history. Comparing denial reasons for White and Black applicants shows that Blacks were more likely to be denied due to unverifiable information, mortgage insurance denial, and credit history; Hispanics were more likely to be hindered by mortgage insurance denial and insufficient cash. Denial reasons varied little by applicant sex.

While this data uncovers disparity in loan approvals by race, ethnicity, and sex at some income levels, it is not possible to determine if the lender motivation for this disparate treatment was due to economic reasons, social discrimination, or both.

Fair Housing Organizations & Activities

In general, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords.

U.S. Department of Housing and Urban Development

The United States Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Chicago, Illinois, oversees housing, community development, and fair housing enforcement in Wisconsin as well as Illinois, Indiana, Michigan, Ohio, and Minnesota. The Office of Fair Housing and Equal Opportunity (FHEO), within HUD's Chicago office, enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in Wisconsin. HUD also provides education and outreach and monitors agencies that receive HUD funding for compliance with civil rights laws.

HUD works with state and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP). Currently, the state of Wisconsin does not have any recipients of the FHAP grant. Many agencies can also apply to receive funding directly from HUD under the Fair Housing Initiatives Program (FHIP). The recipient must be a government agency, a private nonprofit, or a for-profit organization and is selected through a competitive grant program that provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with fair housing laws. The Metropolitan Milwaukee Fair Housing Council was a 2012 FHIP grant recipient and provides fair housing education and outreach throughout southeast Wisconsin, including Waukesha, Ozaukee, and Washington Counties.

Metropolitan Milwaukee Fair Housing Council

The Metropolitan Milwaukee Fair Housing Council (MMFHC) promotes fair housing throughout the State of Wisconsin by combating illegal housing discrimination. MMFHC operates two satellite offices, the Fair Housing Center of Greater Madison (FHCGM) and the Fair Housing Center of Northeast Wisconsin (FHCNW).

MMFHC operates provides the following fair housing programs:

Fair Housing Enforcement Program

- Intake of fair housing complaints and counseling on options for administrative or judicial remedy.
- Investigative services for persons who allege housing discrimination.
- Referrals to attorneys and government agencies.
- Systemic investigations of institutional discrimination.

Fair Housing Outreach and Education Program

- Presentations to consumers, advocates, and the general public.
- Fair housing training for property owners and managers, real estate agents, and other members of the housing industry.
- Fair housing technical assistance and professional support to government agencies, civil rights organizations, social service agencies and housing providers.
- Development and distribution of fair housing educational materials.

Fair Housing Lending Program

- Investigates allegations of predatory lending, mortgage rescue scams, and other fair lending violations.
- Monitors financial institutions' fair lending practices and compliance with the federal Community Reinvestment Act.
- Provides information to financial institutions on how to improve service to low- and moderate- income communities and people of color.
- Provides technical assistance and education on fair lending and foreclosure prevention to lenders, policy makers and the general public.

Inclusive Communities Program

- Technical assistance and professional support to community organizations, developers and local policy makers on inclusionary housing policies and the promotion of racial and economic integration.
- Assistance with consumers' access to pro-integrative housing choices.
- Research, analysis and documentation of fair and affordable housing opportunities and impediments.

In addition to these fair housing agencies, other municipalities, such as the City of New Berlin and the Counties of Jefferson, Ozaukee, and Washington assist in promoting fair housing education and outreach by implementing Fair Housing Proclamations and providing informational materials on fair housing.

Community Survey of Fair Housing

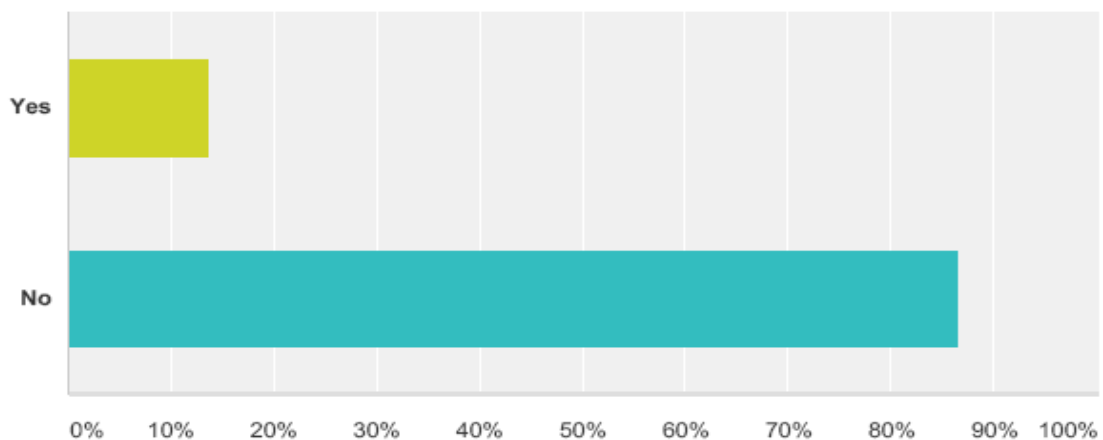
Additional evaluation of perceptions related to fair housing in Waukesha, Washington, Ozaukee, and Jefferson Counties was conducted via a community survey designed to gather insight into the knowledge, experience, opinions, and feelings of local residents, employees, and service providers. A total of 299 persons in the four-county area completed the English survey and 84 respondents completed the Spanish version. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although several questions allowed respondents to offer written comments. While a summary of findings and comments are presented in this section, complete results are available in the Appendix to this report.

Respondents who completed the survey in English were asked if they had ever experienced housing discrimination, to which 240 out of 278 (86%) respondents stated they had never experienced housing discrimination and 38 respondents (14%) reported that they had experienced discrimination.

Comparatively, 18 (27%) of respondents to the Spanish survey noted they had experienced housing discrimination, while 48 of 66 (73%) stated they had never experienced housing discrimination.

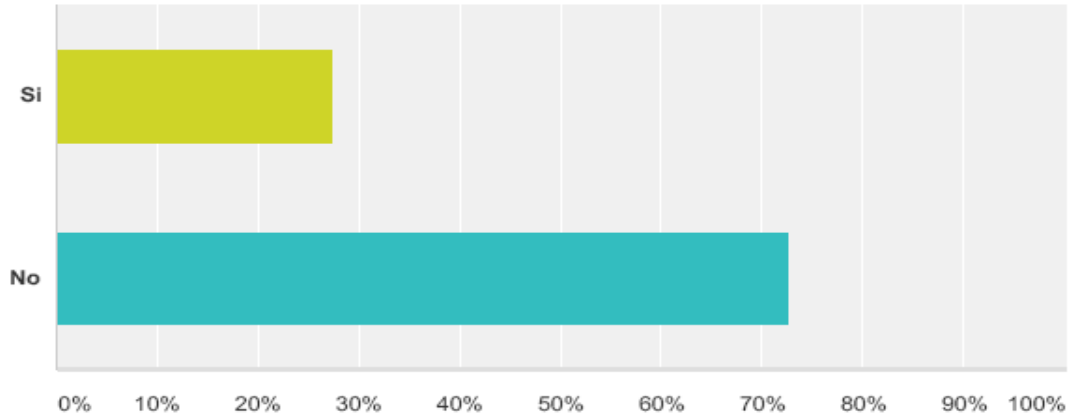
Q21 Since living in your county have you experienced housing discrimination?

Answered: 278 Skipped: 21



Q21 ¿Viviendo en su Condado, has experimentado la discriminación de la vivienda?

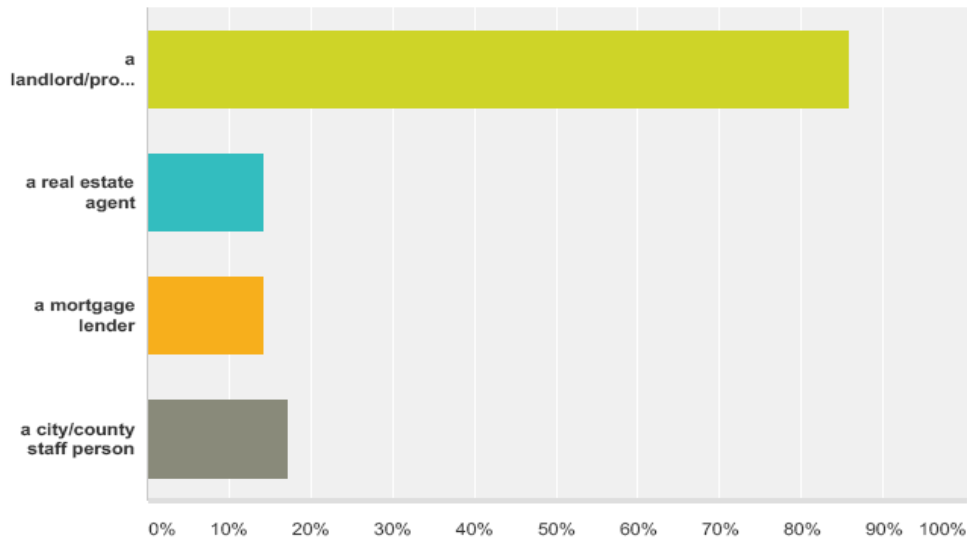
Answered: 66 Skipped: 18



The respondents that had experienced discrimination were asked a follow-up question to ascertain the source of discrimination. Thirty (85%) of the English and 8 (61%) of the Spanish survey respondents who reported discrimination were discriminated against by a landlord or property manager.

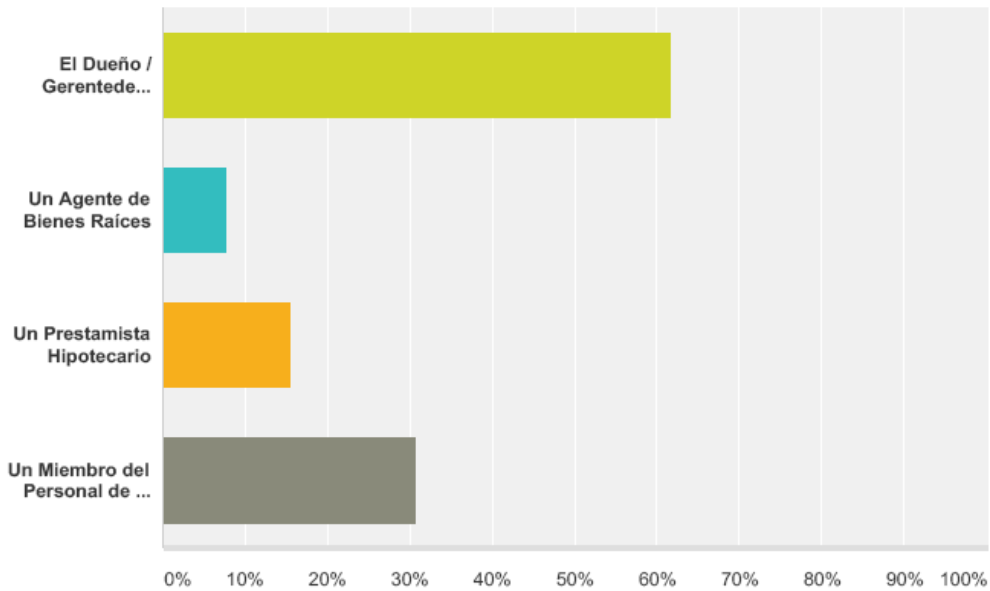
Q22 Who discriminated against you? (CHECK ALL THAT APPLY)

Answered: 35 Skipped: 264



Q22 ¿Quién lo discriminó? (Marque lo que corresponda)

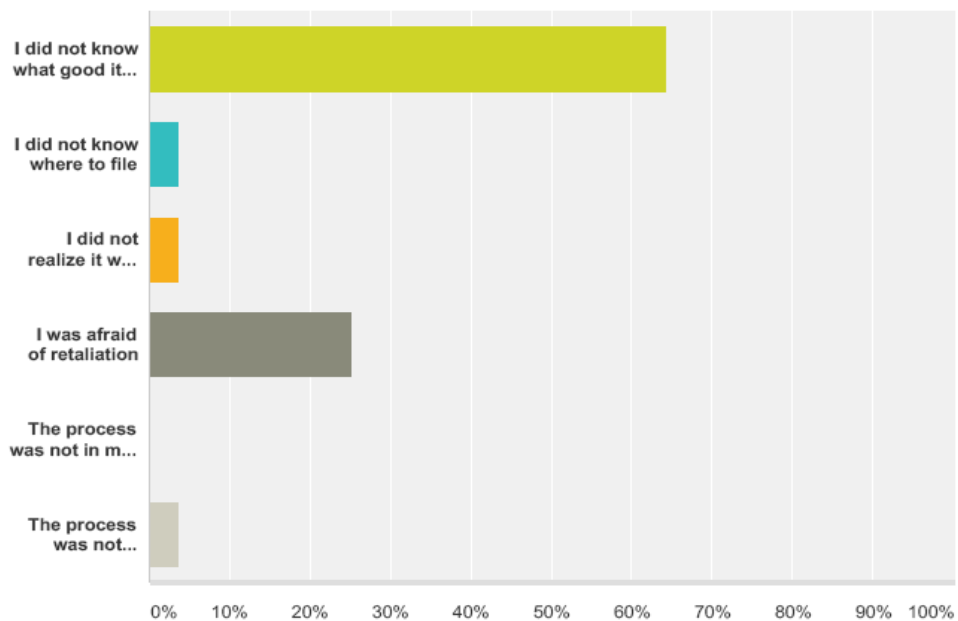
Answered: 13 Skipped: 71



When asked the reason they did not file a fair housing complaint, 18 (64%) of English and 4 (33%) of Spanish survey respondents stated that they did not know what good it would do; 7 (25%) of English and 3 (25%) of Spanish survey respondents responded that they feared retaliation.

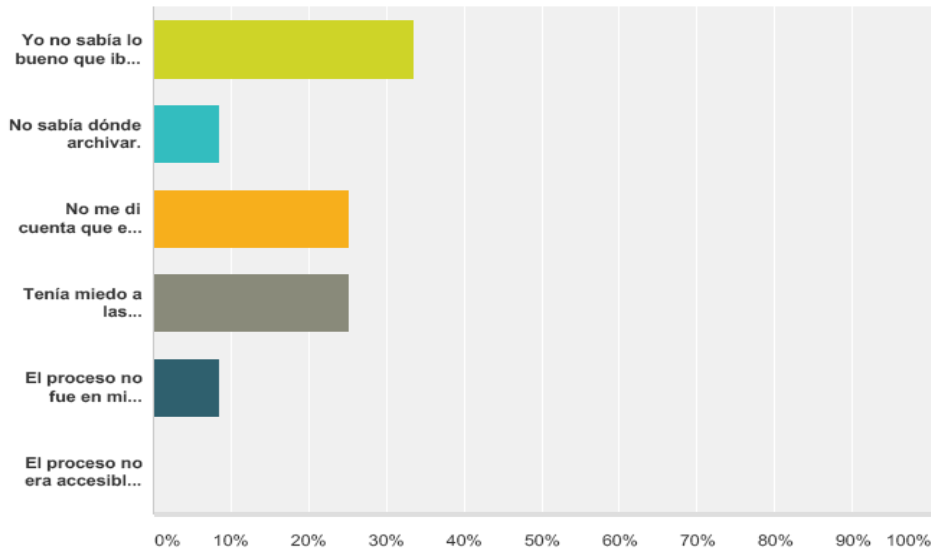
Q24 If you did not file a report, why didn't you file? (SELECT ONLY ONE)

Answered: 28 Skipped: 271



Q24 Si usted no presentó un informe, ¿Por qué no presentó una queja? (SELECCIONAR UNA SOLA)

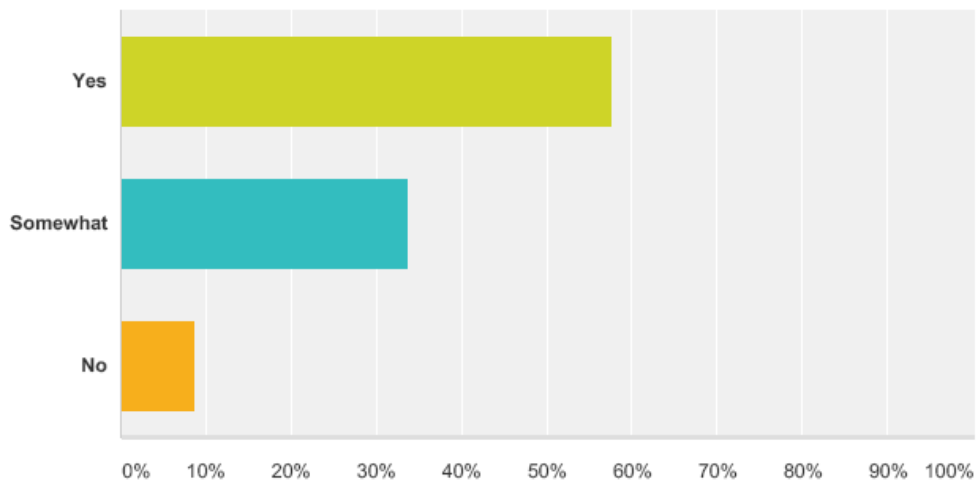
Answered: 12 Skipped: 72



When asked if they were knowledgeable about their fair housing rights, 90 (33%) of English and 29 (50%) of Spanish survey respondents stated they were either familiar or somewhat familiar with fair housing rights. Twenty-three (8%) of English and 11 (18%) of Spanish survey respondents stated they did not know their fair housing rights.

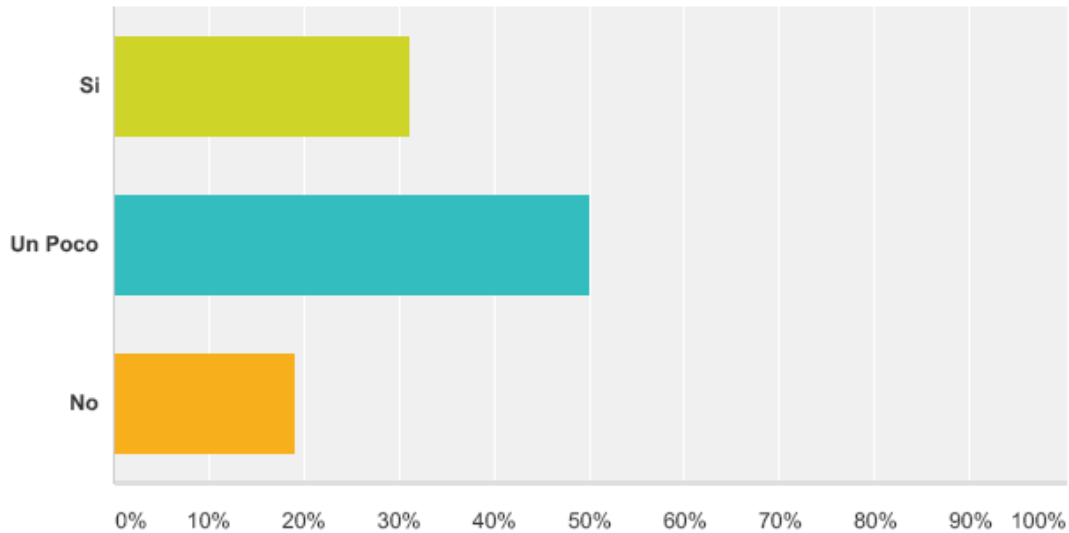
Q25 Do you understand your fair housing rights?

Answered: 267 Skipped: 32



Q25 ¿Entiende sus derechos de equidad de vivienda?

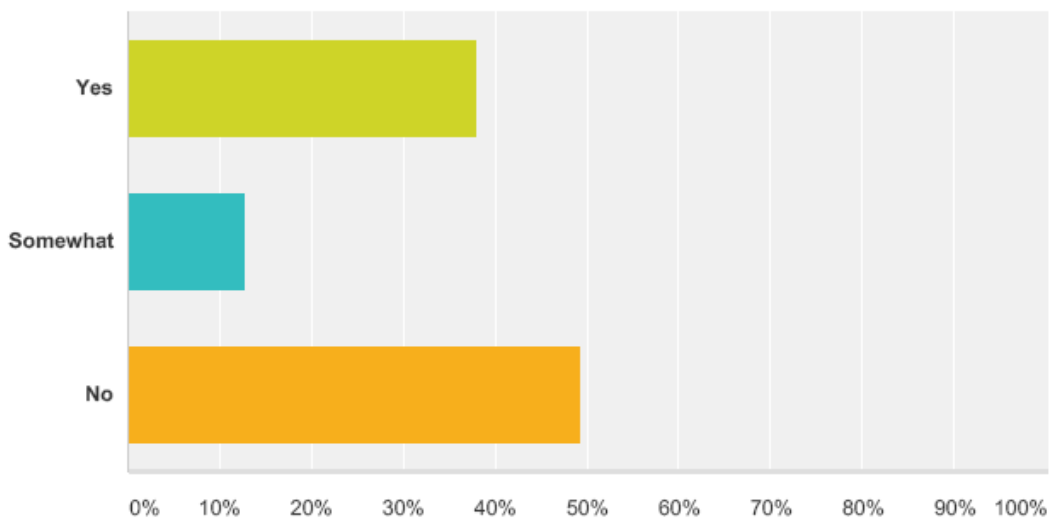
Answered: 58 Skipped: 26



Survey respondents were asked if they knew where to file a housing discrimination complaint, to which 132 (49%) of English and 46 (76%) of Spanish survey respondents stated they did not where to file a discrimination complaint.

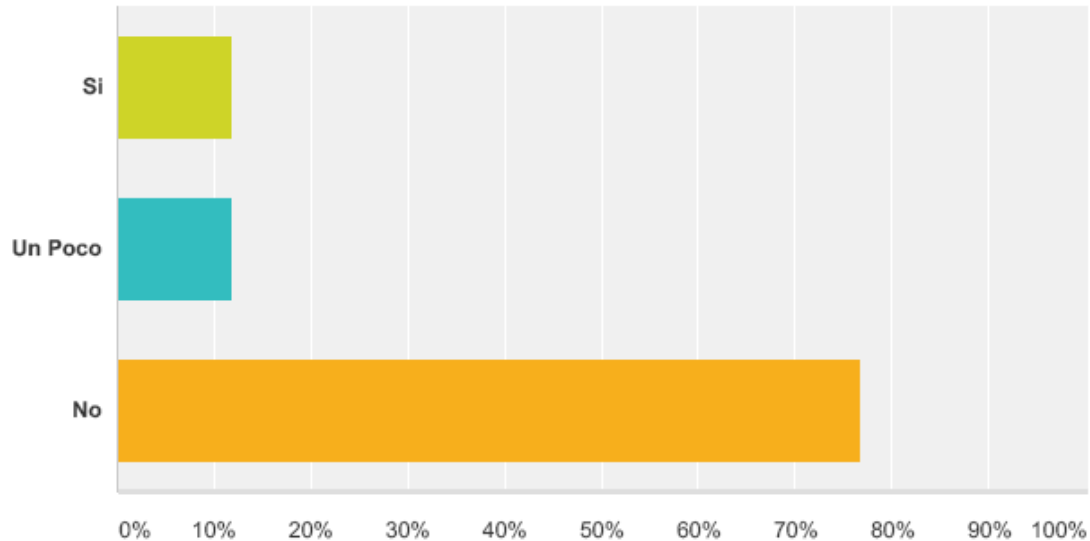
Q26 Do you know where to file a housing discrimination complaint?

Answered: 268 Skipped: 31



Q26 ¿Sabe usted dónde archivar una queja de discriminación de vivienda?

Answered: 60 Skipped: 24



Respondents were asked to identify whether each of the following was a barrier to fair housing within their county:

1. Income levels of minority and female-headed households;
2. Concentration of low-income housing in certain areas;
3. Concentration of group homes in certain neighborhoods;
4. Limitations on density of housing;
5. Lack of adequate zoning for manufactured housing;
6. Restrictive covenants by homeowner associations or neighborhood organizations;
7. Limited capacity of a local organization devoted to fair housing investigation/testing;
8. Lack of knowledge among residents regarding fair housing;
9. Lack of knowledge among large landlords/property managers regarding fair housing;
10. Lack of knowledge among real estate agents regarding fair housing; and
11. Lack of knowledge among bankers/lenders regarding fair housing.

The total number of persons who responded to this question varied by each impediment, however the four most common factors to be identified as barriers to fair housing were:

1. Lack of adequate zoning for manufactured housing;
2. Restrictive covenants by homeowner associations or neighborhood organizations;
3. Concentration of group homes in certain neighborhoods; and
4. Limitations on density of housing.

Hate Crimes

Hate crimes are crimes that are committed because of a bias against race, religion, disability, ethnicity, or sexual orientation. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents. However, it was not until early in this decade that the federal government began to collect data on the number and type of hate crimes are being committed, and by whom.

Fair housing violations due to hate crimes occur when people will not consider moving into certain neighborhoods, or have been run off from their homes for fear of harassment or physical harm.

To a certain degree, hate crimes are an indicator of the environmental context of discrimination. These crimes should be reported to the police or sheriff's department. On the other hand, a hate incident is an action or behavior that is motivated by hate but is protected by the First Amendment right to freedom of expression. Examples of hate incidents can include name calling, epithets, distribution of hate material in public places, and the display of offensive hate-motivated material on one's property. The freedom guaranteed by the U.S. Constitution, such as the freedom of speech, allows hateful rhetoric as long as it does not interfere with the civil rights of others. Only when these incidents escalate can they be considered an actual crime.

Hate crimes become a fair housing concern when residents are intimidated or harassed at their residence or neighborhood. Fair housing violations due to hate crimes also occur when people will not consider moving into certain neighborhoods, or have been run off from their homes for fear of harassment or physical harm. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate or act violently towards a person who has exercised their right to free housing choice. Persons who break the law have committed a serious crime and can face time in prison, large fines, or both, especially for violent acts, serious threats of harm, or injuries to victims. In addition, this same behavior may violate similar state and local laws, leading to more punishment for those who are responsible. Some examples of illegal behavior include threats made in person, writing or by telephone; vandalism of the home or property; rock throwing; suspicious fires, cross-burning or bombing; or unsuccessful attempts at any of these.

Reporting hate crimes is voluntary on the part of the local jurisdictions. Some states started submitting data only recently, and not all jurisdictions are represented in the reports. Many jurisdictions, including those with well-documented histories of racial prejudice, reported zero hate crimes. Another obstacle to gaining an accurate count of hate crimes is the reluctance of many victims to report such attacks.

A total of 237 hate crimes were reported in the State of Wisconsin between 2010 and 2012. Of the 273 hate crimes reported, only 1 hate crime was reported in the Waukesha County Consortia. Many of the hate crime offenses between 2010 and 2012 were attributed to race as the motivation category of the hate crimes. The following tables will present hate crime incidents per bias motivation from 2010 to 2012.

Hate Crime Incidents
per Bias Motivation and Quarter
by State and Agency, 2010

Agency type	Agency name	Number of incidents per bias motivation					Number of incidents per quarter ¹				Population ²
		Race	Religion	Sexual orientation	Ethnicity	Disability	1st quarter	2nd quarter	3rd quarter	4th quarter	
Total		42	13	28	8	2					93
Cities		37	11	27	8	2					
	Appleton	1	0	0	0	0	0	0	1	0	70,975
	Berlin	0	1	0	0	0	1	0	0	0	4,932
	Fond du Lac	0	1	0	0	0	0	0	1	0	42,369
	Green Bay	1	0	0	0	0	0	1	0	0	101,320
	Hudson	4	0	0	0	0	0	4	0	0	12,832
	Janesville	1	0	1	0	0	1	0	0	1	63,651
	Kaukauna	0	0	1	0	0	0	0	0	1	15,948
	Kenosha	0	0	0	1	0	1	0	0	0	98,961
	La Crosse	1	0	1	0	0	1	0	1	0	51,184
	Madison	8	0	5	3	2	1	4	7	6	238,224
	Merrill	1	0	0	0	0	0	1	0	0	9,433
	Milwaukee	16	6	12	1	0	8	10	9	8	605,921
	North Fond du Lac	0	1	0	0	0	0	1	0	0	5,108
	Oak Creek	1	0	1	1	0	1	0	0	2	34,572
	Rhineland	0	0	1	0	0	0	0	0	1	7,471
	Ripon	0	1	0	0	0	0	0	1	0	7,481
	River Falls	0	0	1	0	0	0	0	0	1	14,745
	Seymour	0	0	2	1	0	1	1	0	1	3,396
	Sheboygan	0	1	1	0	0	0	2	0	0	47,516
	Shiocton	1	0	0	1	0	0	0	0	2	943
	Tomahawk	1	0	0	0	0	1	0	0	0	3,580
	Wausau	1	0	0	0	0	0	0	0	1	38,429
	Whitewater	0	0	1	0	0	0	0	1	0	14,211
Universities and Colleges		1	0	0	0	0					
	University of Wisconsin, Platteville	1	0	0	0	0			0	1	7,803
Metropolitan Counties		3	1	0	0	0					
	Dane	1	0	0	0	0	0	0	0	1	
	Iowa	0	1	0	0	0	0	1	0	0	
	Outagamie	1	0	0	0	0	1	0	0	0	
	Racine	1	0	0	0	0	0	0	0	1	
Nonmetropolitan Counties		1	1	1	0	0					
	Clark	0	1	1	0	0	2	0	0	0	
	Manitowoc	1	0	0	0	0	1	0	0	0	

¹Agencies published in this table indicated that at least one hate crime incident occurred in their respective jurisdictions during the quarter(s) for which they submitted a report to the Hate Crime Statistics Program. Blanks indicate quarters for

²Population figures are published only for the cities. The figures listed for the universities and colleges are student enrollment and were provided by the United States Department of Education for the 2009 school year, the most recent

Source: FBI 2011 Hate Crime Statistics, http://www.fbi.gov/about-us/cjis/ucr/hate-crime/2011/tables/table-13-1/table_13_wisconsin_hate_crime_incidents_per_bias_motivation_and_quarter_by_state_and_agency_2011.xls

WISCONSIN

Hate Crime Incidents

per Bias Motivation and Quarter
by State and Agency, 2011

Agency type	Agency name	Number of incidents per bias motivation					Number of incidents per quarter ¹				Population ²
		Race	Religion	Sexual orientation	Ethnicity	Disability	1st quarter	2nd quarter	3rd quarter	4th quarter	
Total		49	4	16	6	1					76
Cities		44	4	14	5	1					
	Appleton	3	0	0	0	0	0	2	0	1	72,939
	Caledonia	1	0	0	0	0	0	1	0	0	24,813
	Everest	4	0	0	0	0	0		4	0	17,111
	Fond du Lac	2	2	0	0	0	1	1	1	1	43,208
	Fox Valley Metro	0	0	0	0	1	0	1	0	0	16,991
	Green Bay	1	0	1	0	0	0	0	0	2	104,510
	Hayward	1	0	0	0	0	0	0	1	0	2,328
	Kenosha	1	0	0	0	0	0	0	0	1	99,650
	Madison	8	1	5	2	0	3	4	5	4	234,225
	Manitowoc	3	0	1	0	0	1	1	1	1	33,883
	Milwaukee	15	1	5	3	0	4	9	9	2	597,426
	Minocqua	1	0	0	0	0	0	1	0	0	4,404
	Oak Creek	1	0	0	0	0	0	1	0	0	34,601
	Rhineland	0	0	2	0	0	2				7,832
	Seymour	1	0	0	0	0	0	0	0	1	3,466
	Wausau	1	0	0	0	0	1	0	0	0	39,276
	West Allis	1	0	0	0	0	0	0	1	0	60,674
Metropolitan Counties		2	0	2	1	0					
	Chippewa	0	0	1	1	0	0	2	0	0	
	Dane	1	0	1	0	0	0	0	1	1	
	Kenosha	1	0	0	0	0	0	0	0	1	
Nonmetropolitan Counties		3	0	0	0	0					
	Portage	1	0	0	0	0	1	0	0	0	
	Sawyer	2	0	0	0	0	0	0	1	1	

¹ Agencies published in this table indicated that at least one hate crime incident occurred in their respective jurisdictions during the quarter(s) for which they submitted a report to

² Population figures are published only for the cities.

Source: FBI 2011 Hate Crime Statistics, http://www.fbi.gov/about-us/cjis/ucr/hate-crime/2011/tables/table-13-1/table_13_wisconsin_hate_crime_incidents_per_bias_motivation_and_quarter_by_state_and_agency_2011.xls

WISCONSIN
Hate Crime Incidents
per Bias Motivation and Quarter
by Agency, 2012

Agency type	Agency name	Number of incidents per bias motivation					Number of incidents per quarter ¹				Population ²
		Race	Religion	Sexual orientatio	Ethnicity	Disability	1st quarter	2nd quarter	3rd quarter	4th quarter	
Total		32	10	13	5	8					68
Cities		29	9	7	4	1					
	Appleton	6	0	1	1	0	1	3	4	0	73,431
	Caledonia	1	0	0	0	0	0	1	0	0	24,764
	Fond du Lac	0	0	2	0	0	0	2	0	0	43,319
	La Crosse	1	1	0	0	0	0	0	1	1	51,851
	Madison	8	3	0	0	1	3	4	3	2	237,508
	Milwaukee	5	4	4	1	0	4	1	2	7	599,395
	Minocqua	1	0	0	0	0	0	0	0	1	4,372
	Oak Creek	0	1	0	0	0	0	0	1	0	34,715
	Rhineland	0	0	0	1	0	0	1	0	0	7,776
	River Falls	1	0	0	0	0	0	0	0	1	14,927
	Seymour	1	0	0	0	0	0	1	0	0	3,481
	Sheboygan	2	0	0	1	0	1	1	1	0	49,261
	Waukesha	1	0	0	0	0	0	0	0	1	71,049
	Wausau	1	0	0	0	0	1	0	0	0	39,313
	West Allis	1	0	0	0	0	0	1	0	0	60,870
Universities and Colleges		1	0	5	0	0					
	University of Wisconsin, Platteville	1	0	5	0	0	0	1	0	5	8,262
Metropolitan Counties		1	0	1	0	0					
	Dane	1	0	0	0	0	1	0	0	0	
	Iowa	0	0	1	0	0	0	0	0	1	
Nonmetropolitan Counties		1	1	0	1	7					
	Burnett	1	1	0	0	1	0	1	2	0	
	Grant	0	0	0	1	0	0	0	0	1	
	Juneau	0	0	0	0	5	1	1	2	1	
	Lincoln	0	0	0	0	1	0	1	0	0	

¹ Agencies published in this table indicated that at least one hate crime incident occurred in their respective jurisdictions during the quarter(s) for which they submitted a report to the Hate Crime Statistics Program.

² Population figures are published only for the cities. The figures listed for the universities and colleges are student enrollment and were provided by the United States Department of Education for the 2011 school year, the most recent available. The enrollment figures include full-time and part-time students.

FBI 2012 Hate Crime Statistics, http://www.fbi.gov/about-us/cjis/ucr/hate-crime/2012/tables-and-data-declarations/13tabledatadecpdf/table-13-state-cuts/table_13_hate_crime_incidents_per_bias_motivation_and_quarter_by_wisconsin_and_agency_2012.xls

Housing Discrimination Complaints

Complaints Filed with the U.S. Department of Housing and Urban Development

HUD's Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through their respective Regional Office of FHEO. Typically, when a complaint is filed with the agency, a case is opened and an investigation of the allegations of housing discrimination is initiated. If the complaint cannot be successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party (complainant or respondent) may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

The number and types of reported incidents of discrimination speak not only to the level of intolerance in a community but also to the level awareness of what constitutes a violation of law, and the level of comfort those victimized have to seek redress for those violations. This section reviews the administrative structure of fair housing enforcement in Waukesha County and the protected classes. It describes the discrimination complaints filed over the past eight years and their outcomes.

Administrative enforcement of housing discrimination laws in Waukesha County is the responsibility of a number of agencies: the Chicago Regional Office of Fair Housing and Equal Opportunity of the U.S. Department of Housing and Urban Development (FHEO) and the Metropolitan Milwaukee Fair Housing Council. The jurisdiction of these offices is overlapping but not identical, and depends on the authority delegated by the underlying laws, the classes of people protected by each law, and the size or type of the housing involved in a complaint of discrimination.

HUD maintains records of complaints that represent violations of federal housing law. Over the January 1, 2006 through July 1, 2014 period, HUD reported a total of 87 complaints filed from within the counties of Waukesha, Washington, Ozaukee, and Jefferson as shown in the Complaints of Housing Discrimination table. This table presents complaint data by basis, or the protected class status of the person allegedly aggrieved in the complaint. Complainants may cite more than one basis, so the number of bases cited can exceed the total number of complaints. As shown therein, a total of 262 basis were cited in relation to the 87 complaints filed. Disability was the most commonly cited basis in the complaints, with 40, followed by race, with 27. Familial status and national origin were cited 19 and 12 times, respectively.

**Complaints of Housing Discrimination Received in Waukesha County Urban County Jurisdiction
January 1, 2006 - July 1, 2014**

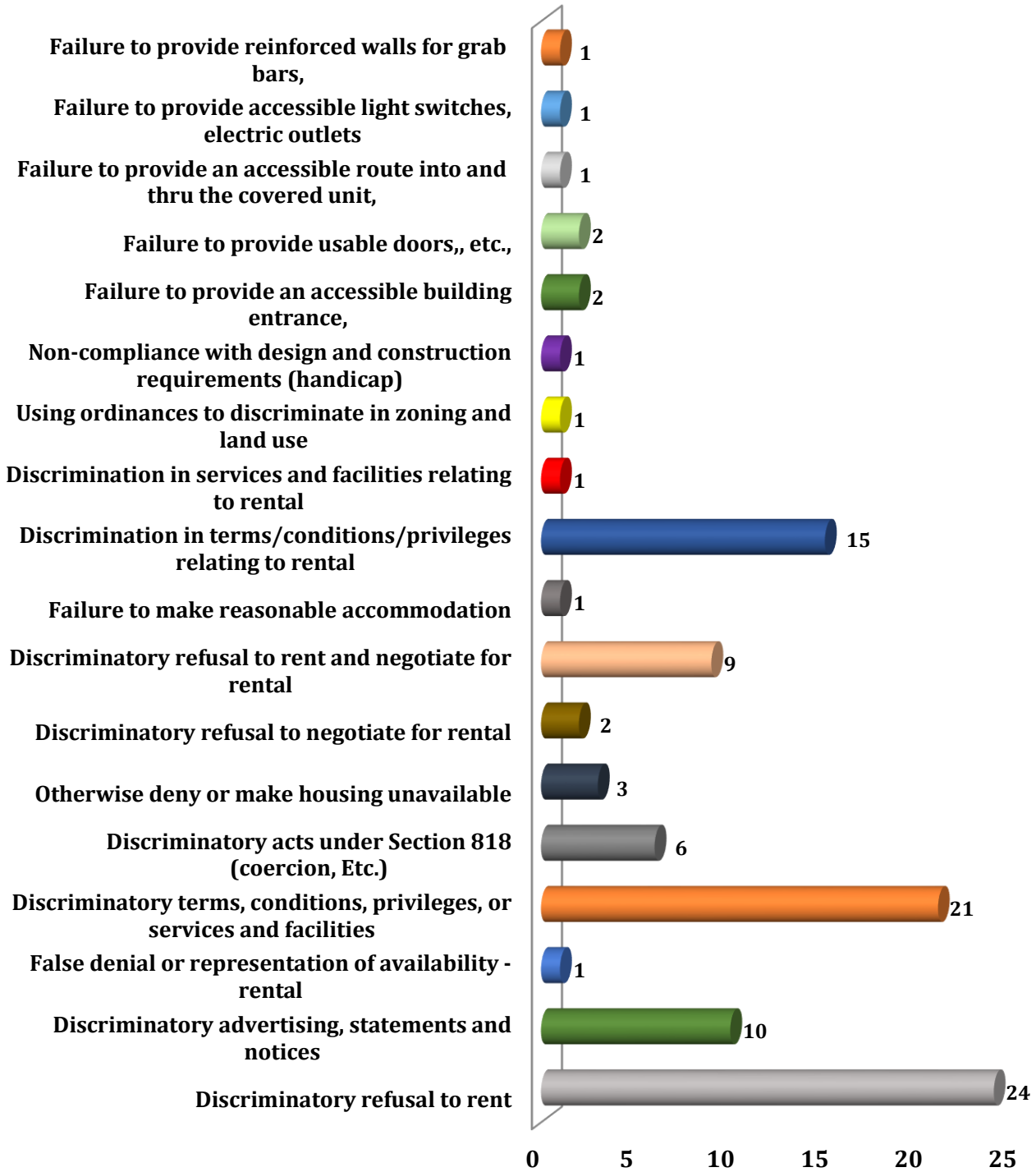
Jurisdiction	Violation City	# Filed	# Closed	# Open	With Cause	Settle-ment	Dis-ability	Color/ Race	Fam. Stat.	Mar. Stat.	Sex	Nat. Origin	Age	Citizen-ship	Reli-gion	Retalia-tion	Harrass-ment	Other/ Criminal Status
WAUKESHA COUNTY	Menomonee Falls	4	4	0	1	1	0	3	1	0	0	0	0	0	0	0	0	0
	Waukesha	28	25	3	10	9	13	9	5	0	5	5	0	0	0	0	0	0
	Madison	1	1	0	1	1	0	1	1	0	0	0	0	0	0	0	0	0
	Hartland	2	2	0	2	2	1	0	1	0	0	0	0	0	0	0	0	0
	Brookfield	4	3	1	2	2	1	2	2	0	0	2	0	0	0	0	0	0
	Nashotah	1	1	0	1	1	0	0	1	0	0	1	0	0	0	0	0	0
	Oconomowoc	4	4	0	2	2	3	1	0	0	0	0	0	0	0	0	0	0
	New Berlin	3	3	0	1	1	1	1	0	0	0	1	0	0	0	0	0	0
	Pewaukee	1	1	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0
	Lannon	1	1	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0
	Hales Corners	1	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
	Dousman	1	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
Sussex	2	2	0	1	1	1	1	1	0	0	0	0	0	0	0	0	0	
WASHINGTON COUNTY	West Bend	7	7	0	2	1	3	0	3	0	0	2	0	0	0	1	0	0
	Hartford	3	3	0	1	0	0	2	1	0	0	0	0	0	0	0	0	0
	Slinger	3	3	0	2	1	2	0	0	0	0	0	0	0	0	0	0	0
	Kewaskum	2	2	0	2	0	1	1	1	0	0	0	0	0	0	0	0	0
	Germantown	1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0
OZAUKEE COUNTY	Plymouth	1	1	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0
	Port Washington	2	2	0	1	1	1	0	1	0	1	0	0	0	0	0	0	0
	Fredonia	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0
	Mequon	1	1	0	1	0	1	1	0	0	1	0	0	0	0	0	0	0
	Cedarburg	1	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0
	Saukville	1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0
JEFFERSON COUNTY	Watertown	2	2	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0
	Madison	1	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0
	Lake Mills	4	2	2	0	0	3	2	0	0	2	0	0	0	0	0	0	0
	Stanley	1	1	0	1	1	1	1	0	0	0	0	0	0	0	1	0	0
	Sullivan	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0
	Whitewater	2	0	2	0	0	0	0	0	2	0	0	0	0	0	0	0	0
TOTAL COMPLAINTS		87	78	9	37	26	0	40	27	19	2	10	12	0	0	2	0	0

Housing complaints filed with HUD can also be examined by closure status. Of the 87 total complaints, 78 (90%) were found to have a no cause determination, which means that discrimination was not found. In an additional 37 complaints, cause was found, and these complaints were successfully conciliated or settled. Of the 37 complaints found to be with cause, there were 102 bases cited, with 40 related to disability, 27 related to race, 19 to familial status, and 12 related to national origin, with the few remaining complaints spread across several other bases.

The issues, or alleged discriminatory actions related to each complaint, are presented in the table and figures on the following pages. In the same way that bases are reported, more than one issue may be associated with each complaint. In this case, 102 issues were cited, with discrimination in terms, conditions, or privileges relating to rental cited 27 times; failure to make reasonable accommodation cited 8 times; discriminatory terms, conditions, privileges, or services and facilities cited 21 times; discriminatory acts under Section 818, which refers to issues of intimidation or coercion, was cited 6 times; and discriminatory refusal to rent was cited 24 times. The most commonly cited issues in this complaint data set related predominantly to rental transactions, which suggests that discriminatory acts leading to the filing of fair housing complaints were more commonly associated with the rental market.

Type of Fair Housing Issue	Number of Complaints
Discriminatory refusal to rent	24
Discriminatory advertising, statements and notices	10
False denial or representation of availability – rental	1
Discriminatory terms, conditions, privileges, or services and facilities	21
Discriminatory acts under Section 818 (coercion, Etc.)	6
Otherwise deny or make housing unavailable	3
Discriminatory refusal to negotiate for rental	2
Discriminatory refusal to rent and negotiate for rental	9
Failure to make reasonable accommodation	1
Discrimination in terms/conditions/privileges relating to rental	15
Discrimination in services and facilities relating to rental	1
Using ordinances to discriminate in zoning and land use	1
Non-compliance with design and construction requirements (handicap)	1
Failure to provide an accessible building entrance	2
Failure to provide usable doors, etc.	2
Failure to provide an accessible route into and thru the covered unit	1
Failure to provide accessible light switches, electric outlets	1
Failure to provide reinforced walls for grab bars	1
TOTALS	102

Fair Housing Complaints by Issue



Complaints Filed With the Metropolitan Milwaukee Fair Housing Council

The Metropolitan Milwaukee Fair Housing Council (MMFHC), established in 1977, also receives complaints by households regarding alleged violations of the Fair Housing Act. The organization is a private, non-profit fair housing advocacy organization that provides fair housing education and outreach services, as well as, accepts and investigates fair housing discrimination complaints for several counties in Milwaukee and Wisconsin to include: Washington, Waukesha, Ozaukee, Dane, Outagamie, Brown, Winnebago, Calumet Counties, and the City of Fond du Lac.

Between 2008 and 2012, there were 277 complaints made to MMFHC. Of the total 277 complaints, there were 86 complaints related to disability status and 55 complaints related to race and/or color. Other notable complaints were familial status (40), sex (29), lawful source of income (18), and age (16). The table below identifies the MMFHC complaint data by issue as investigated by the organization.

Protected Class Basis of Fair Housing Complaint - Metropolitan Milwaukee*						
Type of Complaints	2008	2009	2010	2011	2012	Total
Age	4	1	5	4	2	16
Arrest/Conviction Record	0	0	1	3	0	4
Disability	19	15	19	19	14	86
Familial Status	6	0	9	16	9	40
Lawful Source of Income	4	1	5	5	3	18
Marital Status	2	0	0	3	1	6
National Origin	10	0	1	1	2	14
Race/Color	1	16	15	15	8	55
Religion	1	0	0	1	0	2
Sex	7	4	7	7	4	29
Sexual Orientation	0	3	0	1	0	4
Status as Victim of Domestic Abuse, Sexual Assault or Stalking	0	0	1	1	1	3
TOTAL	54	40	63	76	44	277

*Includes Milwaukee, Ozaukee, Washington, and Waukesha Counties.

Source: Metropolitan Milwaukee Fair Housing Council <http://www.fairhousingwisconsin.com/>

While the MMFHC was unable to provide more recent data, the organization's Annual Report captures complaints by issue during the reviewed period. As such, the MMFHC investigates complaint data from either the complainant or the respondent in order to accurately report the circumstance in the following areas Metropolitan Milwaukee, Dane County, Northeast Wisconsin, and other out of service areas.

An examination of fair housing complaints for jurisdictions can be used as an indicator to identify heavily impacted areas and characteristics of households experiencing discrimination in housing. However, it is important to note that reviewing the number of fair housing complaints filed within a given community cannot by itself be used as a direct indicator of fair housing problems in that community. Among HUD and MMFHC accepting fair housing complaints for the Waukesha County region, the largest numbers of complaints filed were alleged claims of discrimination based on disability status and race/color. It must be noted a lack of complaints filed with no cause determination is also not indicative of the quantity of fair housing discrimination in a community. Many households do not file complaints because they are uneducated about the process of filing a complaint. However, there are households that are aware that they are experiencing housing discrimination, but they are simply not aware that this discrimination is against the law.

To provide a comparative context for the fair housing profile in Waukesha County region, the “2012 Fair Housing Trends Report” by the National Fair Housing Alliance was reviewed. Each year National Fair Housing Alliance [NFHA] collects data from both private, non-profit fair housing organizations and government entities to present an annual snapshot of fair housing enforcement in the United States.⁵³ According NFHA in 2012, there were 28,519 complaints of housing discrimination, compared to 27,092 in 2011. As noted in the NFHA 2013 Fair Housing Trends Report, more disability complaints have been filed than any other type of fair housing complaints. NFHA suggest that this may be attributed to the apartment owner’s direct refusal to make reasonable accommodations or modifications for people with disabilities. Architects and developers continue to design and construct obviously inaccessible apartment buildings and condominium complexes that do not meet the Fair Housing Act’s standards, despite HUD’s 10 year “Fair Housing Accessibility FIRST” education campaign educating architects and builders about their fair housing responsibilities, and even though, HUD has devoted an office solely to disability issues.

⁵³ National Fair Housing Alliance 2013 Fair Housing Trends Report
<http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=rJOodoEJhG4%3d&tabid=3917&mid=5321>

Housing Discrimination Lawsuits

This section provides a summary of the nature, extent, and disposition of significant housing discrimination lawsuits and administrative complaints filed and/or adjudicated between January 2009 and June 2014 involving or affecting parties and local governments within Waukesha, Washington, Jefferson, and Ozaukee Counties, which may impact fair housing choice. Significant housing discrimination cases involving parties and jurisdictions outside the four-county area—including fair housing cases reviewed by the U.S. Supreme Court and the United States Court of Appeals for the Seventh Circuit—also are included for this time period because the issues presented may impact future legislation and litigation or fair housing choice within the HOME Consortium area.

Wisconsin has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 *et seq.* (the “Fair Housing Act”), known as the Wisconsin Open Housing Law (WIS. STAT. § 106.50). Both the FHA and Wisconsin Open Housing Law (“WOHL”) prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. Additionally, the WOHL extends anti-discrimination protection based on six additional characteristics: sexual orientation; marital status; lawful source of income; age; ancestry; and status as a victim of domestic abuse, sexual assault, or stalking. Wisconsin’s statutory definition of “family status” also is broader than the federal “familial status” counterpart, applying to households with one or more minor or adult relatives so that households that are intergenerational or include extended families are protected (e.g. a household with a grandparent, adult child, and minor child). Unlike FHA, the WOHL expressly covers single-family residences which are owner-occupied because the state has recognized that the sale and rental of single-family dwellings make up a significant portion of the housing stock within the state. The WOHL generally prohibits discrimination in single-family and multi-family housing not covered by the FHA, in addition to housing covered by the FHA.

An individual who believes he or she has been the victim of an illegal housing practice under the FHA may file a complaint with the Department of Housing and Urban Development (“HUD”) or file a lawsuit in federal or state court. The Department of Justice may bring suit on behalf of individuals based on referrals from HUD. The WOHL also allows aggrieved persons alleging a violation of fair housing rights to seek redress in state or federal court, or by filing an administrative complaint with the Department of Workforce Development’s Equal Rights Division or a local Fair Housing Council. Unlike HUD, which need only find reasonable cause to proceed with a discrimination complaint, the Equal Rights Division must find probable cause before it can issue a charge on behalf of the complainant. The parties may then choose to have the complaint decided by an administrative law judge of the Equal Rights Division or in a civil action in circuit court.

Though the FHA and Wisconsin Open Housing Law are not identical, they are congruent, and accordingly Wisconsin courts have historically been guided by both state and federal law in deciding claims of housing discrimination.

Housing discrimination claims have been brought against local governments and zoning authorities and against private housing providers. The cases reviewed below reflect the interests of a wide variety of aggrieved plaintiffs including individuals and families impacted by discrimination, local civil rights advocacy groups on behalf of protected classes, and by the U.S. Department of Justice, which brings suits on behalf of individuals through referrals from HUD.

Disparate Impact Claims and the FHA

In 2013, the U.S. Supreme Court granted a writ of certiorari on the following issue: "*Are disparate impact claims cognizable under the Fair Housing Act?*" *Mt. Holly Gardens Citizens in Action, Inc. v. Township of Mount Holly*, 658 F.3d 375 (3d Cir. 2011), *cert. granted*, 133 S. Ct. 2824, 186 L. Ed. 2d 883 (2013). However, that case was ultimately settled before oral argument. All of the federal circuits, including the Seventh Circuit which has jurisdiction to hear appeals from Wisconsin district courts, have held that the FHA affords plaintiffs the ability to prove fair housing violations on the theory of disparate impact. The principal disparate impact case followed in the Seventh Circuit has been *Metropolitan Housing Development Corp. v. Village of Arlington Heights*, 558 F.2d 1283, 1290 (7th Cir. 1977) (holding that a significant discriminatory effect could establish a violation of the Fair Housing Act), *cert. denied*, 434 U.S. 1025 (1978). Moreover, on February 15, 2013, HUD issued a Final Rule establishing that disparate impact claims are cognizable under the FHA. *See* 78 Fed. Reg. 11460 (Feb. 15, 2013) (codified at 24 C.F.R. § 100.500 (2013)).

Under Wisconsin and Seventh Circuit precedent, a plaintiff can establish a violation under the FHA by proving discrimination in the form of: (1) disparate treatment or intentional discrimination; (2) disparate impact of a law, practice or policy on a covered group; or (3) by demonstrating that the defendant failed to make reasonable accommodations in rules, policies, or practices so as to afford people with disabilities an equal opportunity to live in a dwelling. *See Oak Ridge Care Ctr. v. Racine County*, 896 F. Supp. 867, 874 (E.D. Wis. 1995). The cases discussed below generally proceed under one or more of these theories of housing discrimination.

Analysis of Case Law

The cases presented in this section fall under four main fair housing categories: (1) complaints brought against a local municipality for alleged discriminatory zoning or land use practices; (2) complaints brought against major banks for alleged discriminatory lending or REO practices; (3) complaints brought against homeowners' associations for alleged post-sale or post-occupancy discriminatory practices; and (4) complaints brought by the U.S. DOJ against housing providers for alleged discriminatory rental practices.

A. Issue 1: Discriminatory zoning or land use practices, including the failure to affirmatively further fair housing (AFFH).

1. *United States v. City of New Berlin*, Civil Action No. 11-CV-608 (E.D. Wis.); *MSP Real Estate, Inc. v. City of New Berlin*, Civil Action No. 11-CV-281 (E.D. Wis.).

In 2011, housing developer MSP Real Estate, Inc. filed a lawsuit against the City of New Berlin alleging that the City blocked a 180-unit affordable housing project (with 100 units reserved for seniors and 80 “workforce housing” units designated for general or family occupancy) proposed for the City Center Planned Unit Development area in violation of the FHA. Financing for the development was provided under the federal Low Income Housing Tax Credit Program (“LIHTC”), 42 U.S.C. 26 *et seq.*, and pursuant to LIHTC requirements, occupancy was to be restricted to those households earning 60% or less of the area’s median income, with rents below market-rate. The City’s Planning Commission initially approved the project and zoning permit application, but following public opposition, the City reversed the decision. The developer’s lawsuit alleged that opposition to the project was based partly on racial stereotypes and fear that the tenants would be African American. The lawsuit also alleged that following MSP’s proposal, the City changed its zoning and land use requirements to bar affordable housing in the City Center in the future.

The United States Department of Justice filed its own lawsuit against the City in 2011, alleging that the City made unavailable or denied dwellings to persons on the basis of race or color in violation of 42 U.S.C. § 3604(a) of the FHA and interfered with the exercise or enjoyment of rights under the FHA in violation of 42 U.S.C. 3617. The DOJ alleged that the City’s actions were done with the intent and effect of discriminating against prospective African American tenants of MSP’s proposed development and such actions amounted to a pattern or practice of discrimination on the basis of race or color. The district court subsequently consolidated the two cases.

The City denied that any of its actions were undertaken with any discriminatory motive, intent or result. However, shortly thereafter, New Berlin agreed to issue the necessary permits to allow MSP to commence construction of the proposed senior and workforce affordable housing units. Under a settlement agreement with MSP, New Berlin was required to issue a building permit to MSP for construction of 102-units, of which 90 units would be income-restricted and rent-restricted as required by the federal LIHTC program.

New Berlin then settled with the DOJ through a Consent Decree that required that the City not take any further action to obstruct or delay the affordable housing project, and take affirmative steps to provide for future affordable housing, including the following: modifying certain zoning and land use requirements; lifting a moratorium on development in the City Center; increasing the total number of dwelling units that may be built in the City Center; allowing construction of multifamily housing on three parcels up to the same density and building height as the MSP workforce housing development; establishing a Housing Trust Fund; developing a Fair Housing Outreach Plan; appointing a fair housing compliance officer; and providing fair housing training to all City officials and employees who have duties related to planning, zoning, permitting, construction, or occupancy of housing.

The Consent Decree remains in effect until April 20, 2016, unless the DOJ moves for an extension, and the Court retains jurisdiction to interpret and enforce its terms as necessary.

The project that became so controversial and litigious has generally been viewed as a success. The 102 first-phase affordable apartments opened at 100 percent occupancy, and MSP states the development has had a low turnover rate for more than a year. The developer reports that the second-phase, which includes market rate apartments, has a waiting list of prospective tenants.

2. *Crabtree Residential Living, Inc. v. City of Kenosha*, Civil Action No. 2:10-CV-00691 (E.D. Wis.) (filed Aug. 13, 2010; settled and dismissed June 1, 2011).

Plaintiff Crabtree Residential Living, Inc. (“Crabtree”) provides services to developmentally disabled adults, including the development and operation of group homes identified under state law as Adult Family Homes (“AFH”) (with up to four residents) and Community Based Residential Facilities (“CBRF”) (with five or more residents). In 2010, Crabtree applied to the City of Kenosha for approval to add two more residents to an existing state-licensed, four-person AFH known as Aspen House to convert it to a six-person CBRF. This request required Crabtree to go through the public hearing process, during which its special request was approved twice by the Plan Commission but ultimately denied in a vote by the Common Council. This denial prevented a prospective Aspen House resident from living in the housing of his choice and prevented Crabtree from providing housing to persons with disabilities.

The City refused Crabtree’s request citing the State’s distance and density limits (WIS. STAT. § 62.23(7)(i)) for group homes. Wisconsin Statute § 62.23(7)(i) gives Wisconsin cities the authority to limit the number of AFHs and CBRFs by establishing a 2,500-foot distance requirement between AFHs or CBRFs and a 25 person or 1% population ceiling on the number of CBRF residents in a given area of a city. Wisconsin cities must choose whether or not to enforce the distance and density limits. Kenosha had adopted these distance and density limits into its zoning code.

Plaintiffs filed a federal lawsuit alleging discrimination under the FHA, Americans with Disabilities Act (42 U.S.C. § 12101 et seq.), and Rehabilitation Act (29 U.S.C. § 794 et seq.), and seeking injunctive

relief directing the City to permit Crabtree to operate Aspen House and further directing the City to refrain from enforcing the State's distance/density limitation at Aspen House or any other location in the future. Plaintiffs also sought compensatory and punitive damages.

The City denied liability, but agreed to mediation. The case was then settled, with the City agreeing to amend its zoning ordinance to repeal sections imposing distance and density limits on housing for persons with disabilities with eight or fewer residents. Housing for more than eight residents that does not meet the requirements of WIS. STAT. § 62.23(7)(i) still requires Plan Commission and Common Council approval. The remainder of the settlement agreement is confidential and has not been disclosed.

B. Issue 2: Discriminatory lending and discriminatory REO practices.

1. *National Fair Housing Alliance v. U.S. Bank, NA*, Housing Discrimination Complaint filed with HUD on April 2012 (subsequently amended to add new parties and cities).

In 2012, the National Fair Housing Alliance (NFHA)—a nationwide alliance of private, nonprofit, fair housing organizations—and four of its member organizations filed an administrative housing discrimination complaint with HUD against U.S. Bank, N.A. and U.S. Bancorp (the “Bank”). The Complaint was the result of NFHA’s multi-city investigation of U.S. Bank REO (Real Estate Owned) properties, allegedly revealing significant disparities based on race, color, or national origin in all surveyed metropolitan areas. The NFHA amended the complaint twice to add new complainant organizations, including the Metropolitan Milwaukee Fair Housing Council, and new evidence of discriminatory practices in more cities, bringing the total to 35 cities in 15 metropolitan areas (including Milwaukee, Dayton, Chicago, Atlanta, Dallas, Memphis, New Orleans, Washington D.C., and others).

Under NFHA’s methodology, Complainant fair housing organizations evaluated maintenance and marketing problems or deficiencies at REO properties in selected zip codes with high foreclosure rates in moderate, middle, and higher income areas across racial lines. The Complainants’ evidence showed that the Bank’s foreclosed single-family and townhome properties in predominately white neighborhoods and zip codes are more likely to have well-maintained lawns, secured entrances, and professional sales marketing, whereas REO properties in majority non-white neighborhoods within the same metropolitan areas are more likely to have poorly maintained yards, unsecured entrances, appear to be vacant or abandoned, and have poor curb appeal. In Milwaukee, Wisconsin, for example, Complainants evaluated 34 REO properties owned by the Bank, finding that 78% of REO properties in predominantly white neighborhoods had fewer than five maintenance or marketing deficiencies, while only 48% of properties in minority communities had fewer than five deficiencies.

The amended complaint alleges that as a result of the Bank’s discriminatory conduct, cities, residents, and homeowners in the subject cities have been: “(a) subjected to deteriorating and

dilapidated living conditions in their neighborhoods; (b) denied opportunities for neighborhood stabilization and economic recovery; and (c) harmed in their home investments because of Respondents' efforts to unnecessarily depress the property value of REOs.” The Complainants assert that the pattern and practice of maintaining and marketing REO properties in predominantly white communities in a materially better manner than the REO properties in predominately African American and Latino neighborhoods violates the Fair Housing Act, 42 U.S.C. § 3604(a), (b), (c), and (d), and HUD's implementing regulations. The complaint is still under investigation with the U.S. Dept. of Housing and Urban Development.

2. *National Fair Housing Alliance v. Bank of America, Corp.*, HUD Complaint filed September 25, 2012 (subsequently amended to add new parties and cities).

In 2012, the NFHA and five of its member organizations filed a discriminatory housing complaint with HUD against Bank of America, Corp., Bank of America, N.A., and BAC Home Loan Servicing, LP (the “Bank”). The allegations against the Bank were substantially similar to those made against U.S. Bank, discussed previously. The NFHA alleged that a multi-city investigation of foreclosed homes owned, managed, and serviced by the Bank revealed significant disparities based on race, color, or national origin in all surveyed metropolitan areas. Using the methodology employed in the U.S. Bank case, NFHA showed that since at least 2009 and continuing to the present, the Bank’s REO foreclosed single-family and townhome properties in predominately white neighborhoods and zip codes are overall better maintained and marketed than its REO properties in predominately black, Latino, or non-white communities.

NFHA amended the complaint multiple times to add new cities, properties, and complaining housing advocacy organizations, including the Milwaukee region and the Metropolitan Milwaukee Fair Housing Council. The latest amended complaint brings the total to 20 metropolitan areas where Bank of America is alleged to have discriminated in its maintenance and marketing of its bank-owned homes.

The Complainants assert that Bank of America’s discriminatory practices violate the Fair Housing Act, 42 U.S.C. § 3604(a), (b), (c), and (d), and HUD's implementing regulations. Complainants allege that Bank of America’s disparate treatment has the effect of discouraging potential purchasers from buying homes in communities of color and foreclosed properties remain vacant for extended periods of time; reinforcing differences in property values between communities of color and White communities; reinforcing negative stereotypes about communities and individuals based on race and national origin; perpetuating and exacerbating racial segregation in the housing market; adversely affecting home values and wealth of homeowners in communities of color; and adversely affecting the emotional and physical health of residents of communities of color. The complaint is still under investigation with the HUD.

3. *United States v. Southport Bank*, Civil Action No. 2:13-CV-01086 (E.D. Wis.) (complaint filed Sept. 26, 2013, and consent order entered Oct. 11, 2013).

In 2013, the United States filed a “discriminatory pattern or practice” lawsuit against Southport Bank of Kenosha, Wisconsin following a referral by the Federal Deposit Insurance Corporation (FDIC). In 2007 and 2008, 96% of the Bank’s home mortgage loans were made to borrowers in two metropolitan Statistical Areas, Chicago-Naperville-Joliet and Milwaukee-Waukesha. The government alleged that the bank violated the FHA and the Equal Credit Opportunity Act, 15 U.S.C. §§ 1691-1691f (“ECOA”) by discriminating against African American and Hispanic borrowers in its residential mortgage lending from 2007 to 2008.

The suit arose following a Compliance Examination by the FDIC into Southport’s lending practices based on statistical analyses of 2007 and 2008 Home Mortgage Disclosure Act data. These analyses indicated that brokers who generated loan applications for the Bank had charged hundreds of African American and Hispanic wholesale borrowers higher fees than similarly situated non-Hispanic white borrowers (on average thousands of dollars more). The government alleged that loan prices for these African American and Hispanic borrowers were altered not as a result of the borrower’s creditworthiness or other objective criteria related to borrower risk, but by subjective and unguided pricing practices based on the borrower’s race and national origin. The FDIC referred the case to the U.S. Department of Justice pursuant to 15 U.S.C. § 1691e(g), and following the DOJ’s own review of the data and investigation, it brought this lawsuit.

The Bank denied the allegations, but agreed to pay \$687,000 into a Settlement Fund to be disbursed to African American and Hispanic borrowers who were victims of discrimination by the Bank and its mortgage brokers. The Consent Order provides that any money remaining in the Settlement Fund following notifications to affected borrowers must be distributed to organizations that provide housing services such as credit counseling, legal representation of borrowers seeking loan modification or foreclosure prevention, or financial education targeted to assist African American and Hispanic communities where Southport presently or formerly operated.

C. Issue 3: Post-sale/occupancy discriminatory practices

1. *Bloch v. Frischholz*, Civil Action No. 6-3376, 587 F.3d 771 (7th Cir. 2009).

Plaintiffs in this case were long-time residents of a condominium building in Chicago and, as such, were subject to the rules and regulations enacted by the Condo Association's Board of Managers (the “Association”). As observant Jews, Plaintiffs displayed a small religious item called a mezuzot on the doorposts outside of their condo units. When the Association enacted and enforced new rules prohibiting “objects of any sort” outside dwelling unit entrance doors, the Association began taking down and confiscating mezuzot (along with other items outside residents’ units). The Plaintiffs explained that Jewish law requires mezuzot to be displayed on the exterior doorpost and that observant Jews could not live in a place that prohibited them. The Association, however, refused to oblige the Plaintiffs’ formal request for a rule change.

In 2005, the Plaintiffs filed a federal lawsuit based on claims under §§ 3604(a), 3604(b), and 3617 of the FHA (42 U.S.C. §§ 3601 et seq.) and the Civil Rights Act, 42 U.S.C. § 1982. A judge ordered the Defendants not to remove the Plaintiffs' mezuzot and shortly thereafter the Association ratified a rule change creating an exception for religious objects. The City of Chicago and the Illinois legislature subsequently adopted laws prohibiting restrictions on affixing religious signs or symbols to doorposts. These legislative changes mooted the Plaintiffs' claim for an injunction, but their claim for damages remained.

The district court, however, would not apply the FHA to the Plaintiff's case, concluding that the Seventh Circuit decision in *Halprin v. Prairie Single Family Homes of Dearborn Park Ass'n*, 388 F.3d 327 (7th Cir. 2004) (holding that post-sale harassment of homeowners did not violate the FHA's prohibition on discrimination in the sale of a dwelling), precluded the condo owners from relying on §§ 3604(a) and 3604(b) of the FHA to safeguard their rights from any post-acquisition discrimination. The district court also found a lack of evidence of intentional discrimination and denied the § 3617 and §1982 claims.

A panel of the Seventh Circuit affirmed the district court's judgment (see *Bloch v. Frischholz*, 533 F.3d 562 (7th Cir. 2008) (Wood dissenting), *vac'd en banc*, 587 F.3d 771 (7th Cir. 2009)), finding that *Halprin* precludes claims for post-sale conduct under §§ 3604(a) and 3604(b) unless the conduct is so severe as to amount to a constructive eviction. However, the Seventh Circuit subsequently granted an en banc review of the case and, in a unanimous opinion, partially reversed itself to find that under specific and limited circumstances the FHA *can* reach post-occupancy discrimination. The Court determined that §3604(a)—which proscribes the refusal "to sell or rent...or to refuse to negotiate for the sale or rental of, or otherwise make unavailable...a dwelling to any person" because of the protected class status—can support a post-occupancy claim similar to constructive eviction (such as post-sale practices tantamount to "redlining").

The Court emphasized that §3604(a) protects "availability" and that constructive eviction requires surrender of possession by the tenant. Although Plaintiffs asserted that under Jewish law they would be prohibited from living there without the muzuzot, Plaintiffs never moved out. Thus, the Court found that Defendants' conduct had not rendered housing unavailable to Plaintiffs and dismissed their claim under §3604(a).

Section 3604(b) makes it unlawful to discriminate "in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith," on the basis of any of the six protected classes. The Blochs purchased their dwelling units subject to the condition that the Association can enact rules that restrict the condo-owners' post-sale rights in the future. The Court found it was this contractual connection between the Blochs and the Association that distinguishes the case from *Halprin*, which concerned isolated acts of discrimination by an individual not linked to the terms or conditions related to acquisition. Without overruling *Halprin*, the Court determined that the agreement to be governed by the Association's bylaws was a term or condition of sale that brings the case within § 3604(b). Accordingly, §3604(b) can be invoked to

prohibit the condominium from "discriminating against the Blochs through its enforcement of the rules," even facially neutral rules, since compliance with those rules is part of the original condition of sale. This allowed the Plaintiffs' damages claim to go forward but would still require proof of intentional discrimination.

The Plaintiffs' final claim under the FHA was under § 3617, which makes it unlawful to "coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of his having exercised or enjoyed...any right granted or protected by" §§3603 –3606. The court stated that a §3617 cause of action can exist independent of other violations of the FHA, determining that "§3617 reaches a broader range of post-acquisition conduct" and that a §3617 claim does not require a plaintiff to actually vacate the premises." On this ground, the Court would allow Plaintiffs to proceed to prove intentional discrimination that Defendants "coerced, intimidated, threatened, or interfered with the Blochs' exercise or enjoyment of their right to inhabit their condo units because of their race or religion."

Plaintiffs offered evidence that Defendants' interpretation and enforcement of the rule was intentionally discriminatory because of the Plaintiffs' religion and the case was finally settled by consent decree in 2011. The decree bars the Association from retaliating against Plaintiffs, interfering with the sale or lease of their condo units, or taking any action against residents "on account of their race or religion that would interfere with their right to use — or the exercise or enjoyment of — their property or fair housing rights." The remaining terms of the settlement are confidential.

The *Halprin* and *Bloch* cases create a split among the federal circuits. Eight of the Circuit Courts of Appeals (the First, Fourth, Sixth, Eighth, Ninth, Tenth, Eleventh, and D.C. Circuits) have held that the FHA does apply to post-acquisition discrimination. However, the Fifth Circuit has followed *Halprin* in concluding that the FHA does not protect post-acquisition occupancy of housing. (*See, e.g., Cox v. City of Dallas*, 430 F.3d 734 (5th Cir. 2005)).

2. *Mehta v. Beaconridge Improvement Assoc.*, 432 Fed. Appx. 614, 2011 U.S. App. LEXIS 15761 (7th Cir. July 28, 2011).

Plaintiff homeowner sued Defendants (a homeowners' association, its board, and two employees) alleging national origin (Indian) discrimination and retaliation under the FHA and 42 U.S.C.S. § 1983. The district court (N.D. Ill.) dismissed his complaint finding that the allegations were insufficient to establish a claim for discrimination or retaliation. Plaintiff appealed.

Plaintiff alleged that the homeowners' association gave preferential treatment to white residents in its management and maintenance of common areas, while withholding services to his family and other minority residents. After Plaintiff complained to the board, the association put his family's account on delinquent status and barred them from using the subdivision's pool, club house, and

tennis court. At one point, an employee shouted at him in racial terms, "You are not moved out yet, you Indian."

Following its en banc decision in *Bloch*, infra, on appeal the Seventh Circuit began its analysis by recognizing that "the FHA grants homeowners a cause of action against homeowners' associations for invidious discrimination or retaliation linked to the terms, conditions, or privileges accompanying their property." See 42 U.S.C. §§ 3604(b), 3617; *Bloch v. Frischholz*, 587 F.3d 771, 779-84 (7th Cir. 2009) (en banc). If a homeowners' association fails to provide maintenance services or limits the use of privileges, services, or facilities associated in an intentionally discriminatory manner, a homeowner may sue under the FHA. The Seventh Circuit reversed the district court for too quickly dismissing Plaintiff's claims as conclusory, and found that the Plaintiff's allegations suffice to state a plausible claim of discrimination and retaliation. It then remanded the case back to the district court to be adjudicated on the merits of Plaintiff's factual allegations. The parties entered a confidential settlement agreement, and the case was dismissed.

D. Issue 4: Discriminatory rental practices investigated by HUD and referred to the DOJ for civil prosecution

During the survey period, the Department of Housing and Urban Development (HUD) referred multiple cases to the Department of Justice following elections by the aggrieved parties to have their respective FHA claims resolved in a civil action in federal district court pursuant to 42 U.S.C. § 3612(a). HUD may authorize the Attorney General to commence a civil action, pursuant to 42 U.S.C. § 3612(o), following the timely filing of a fair housing complaint by an aggrieved party, a complete investigation, failed conciliation attempts, and the issuance of a Charge of Discrimination showing reasonable cause exists to believe that illegal discriminatory housing practices had occurred. While these cases, standing alone, may not have a significant impact on fair housing choice within a community due to the small number of prospective tenants and housing units they represent, taken together they illustrate HUD's and the DOJ's efforts to protect the housing opportunities guaranteed by the Fair Housing Act for persons of protected classes who may not otherwise have the resources to fight for redress.

1. *United States v. Bachmaga*, Civil Action No. 2:13-CV-01243 (E.D. Wis.) (filed Nov. 4, 2013, and settled by consent decree May 8, 2014).

The Department of Justice brought suit in this case on behalf of a complainant alleging that the owners of six rental units in Oak Creek, Wisconsin discriminated against her based on race and familial status. Complainant, who is African American, sought to apply for a unit at the subject property for her and her minor daughter, who also is African American. The manager quoted a higher price for the unit than what was originally advertised and made statements regarding no other children living on the property and other tenants preferring quiet. The manager failed to make himself available to receive a rental application and then stopped returning her phone calls. The

unit was subsequently rented to a white woman with no children for less than the cost quoted to Complainant.

Following testing by the Metropolitan Milwaukee Fair Housing Council, the DOJ sought relief for the aggrieved complainant and her daughter under the FHA based on the housing provider's following violations: (1) discrimination in the terms, conditions, or privileges of rental of a dwelling because of race and familial status, in violation of 42 U.S.C. § 3604(b); and (2) representations because of race and familial status that a dwelling was not available for rental when such dwelling was in fact so available, in violation of 42 U.S.C. § 3604(d).

The parties agreed to resolve the claim via Consent Decree, which enjoined Defendants from (1) refusing to rent after the making of a bona fide offer, or refusing to negotiate for the rental of, or otherwise making unavailable or denying, a dwelling to any person because of race; (2) discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race; (3) making or publishing any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race; and (4) representing to any person because of race that any dwelling is not available for rental when such a rental is in fact so available. Defendants also were required to attend fair housing training approved by the United States. The Court retains jurisdiction to enforce the terms of Consent Decree for one year, unless extended by motion of a party.

2. *United States v. Allegro Apartments, LLC*, Civil Action No. 2:13-CV-01358 (E.D. Wis.) (filed Dec. 2, 2013, and settled by consent decree January 8, 2014).

In this case, the Department of Justice represented a complainant alleging that the owners of a rental property in Racine, Wisconsin violated the FHA on the basis of disability by refusing to rent an apartment because plaintiff needed an assistance dog. A manager of the apartment complex claimed there was a strict "no animals" policy and refused to rent to the complainant despite her specific request for a reasonable accommodation. The Complaint alleged that at the time, several tenants had dogs and other animals residing with them in their units at the subject property.

The DOJ sought relief for the aggrieved complainant and her husband under the FHA based on the housing provider's following violations: (1) discrimination in the rental of and denial of a dwelling to the prospective tenants because of disability, in violation of 42 U.S.C. § 3604(f)(1)(A); (2) refusal to make reasonable accommodations in the rules, policies, practices, or services, when such accommodations were necessary to afford the complainants an equal opportunity to use and enjoy a dwelling, in violation of 42 U.S.C. § 3604(f)(3)(B); and (3) making statements with respect to the rental of a dwelling that indicates a limitation or discrimination based on complainant's disability, in violation of 42 U.S.C. § 3604(c).

The parties agreed to resolve the claims via Consent Decree, which enjoined the defendants from further discriminating against protected persons in the rental of a dwelling, refusing to make reasonable accommodations, or making statements with respect to the rental of a dwelling that indicates a limitation or discrimination because of a disability. Defendants also were required to adopt a reasonable accommodation policy addressing requests for service animals, to attend fair housing training, and to pay the complainants \$8,500.

3. *United States v. McCoy*, Civil Action No. 2:11-CV-00388 (E.D. Wis.) (filed Oct. 3, 2011, and settled by consent decree Aug. 29, 2012).

In 2011, the Department of Justice represented Complainants alleging that the owner of single-family rental units in Green Bay, Wisconsin discriminated against them based on race. Complainant Walker, in response to a newspaper advertisement, spoke to Defendant by telephone about renting a three-bedroom home for herself, Complainant Robinson, and Robinson's three children. The Complaint stated that Walker's voice is readily identifiable as African American. The Complaint alleged that during repeated phone calls to Defendant in an attempt to obtain housing, Defendant stated to Complainant Walker that he did not rent to persons from Milwaukee and that neighbors would have a problem with her renting in their nice neighborhood. He then refused to return Complainant's calls.

Following testing by the Metropolitan Milwaukee Fair Housing Council, the DOJ sought relief for the aggrieved Complainants under the FHA based on the Defendant's following violations: refusing to negotiate for the rental of, or otherwise making unavailable or denying dwellings to persons because of race, in violation of 42 U.S.C. § 3604(a); and making statements with respect to the rental of dwellings that indicate a preference, limitation, or discrimination based on race, or an intention to make any such preference, limitation, or discrimination, in violation 42 U.S.C. § 3604(c).

Defendant denied the allegations, but agreed to resolve the claims via Consent Decree, which enjoined the Defendant from discriminating against prospective tenants because of race or familial status or from making any statements that indicate a preference for tenants based on race or familial status. The Consent Decree also required Defendant to attend approved fair housing training and pay \$35,000 to the Complainants.

Impediments & Recommendations

In the *Fair Housing Planning Guide*, HUD defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices.⁵⁴ Throughout this assessment various community issues have surfaced, both positive and negative. Some of these issues represent general community needs (e.g. the quality of jobs available) and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments. Even some affordable housing-related issues (e.g. low credit scores leading to denial of apartment rental applications) fall short of classification as impediments to fair housing choice.

For this analysis, qualitative data received in the form of input from interviews and community meetings was combined with quantitative data from the U.S. Census and from the many other sources consulted. In some cases, the quantitative data collected from a single source was clear and compelling enough on its own to indicate the existence of an impediment. In other cases, and particularly with the use of qualitative data, the cumulative effect of a comment or criticism repeated many times over in many different settings was sufficient to indicate a barrier. Sometimes a weak or inconclusive correlation of quantitative data from one source could be supported by public comments and input or data from another source to constitute an impediment.

In this section, the impediments identified are summarized with supporting examples noted. Each impediment listed is followed by recommendations, the implementation of which will correct, or begin the process of correcting, the related barrier. It should be noted that these barriers are largely systemic and will require effort from both private sector and public sector actors to correct.

Impediment #1: Zoning Regulations and Housing Mix Ratios that Reduce Opportunities for Affordable Housing Development

A Regional Housing Plan for Southeastern Wisconsin: 2035 prepared by the Southeastern Wisconsin Regional Planning Commission identified several zoning and regulatory impediments to the development of affordable housing. These included excessive minimum floor area requirements, excessive minimum lot sizes requirements, and other limits on density. Several communities do not permit multifamily housing by right – some require a conditional use permit and others do not allow it at all. Housing mix ratios also explicitly restrict the share of multifamily housing within a community. While density is limited in some cases by a lack of infrastructure (i.e., sewers), several villages in the study area have sewer service yet still require at least 70% of residential units to be single-family. Research conducted for the *Regional Housing Plan* shows that a lack of higher density development with municipal infrastructure, including multifamily units, disproportionately impacts minorities and low-income households who have a greater need for affordable housing.

⁵⁴ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

Recommendations:

The Land Use & Zoning section of this report recommends specific actions to addressing zoning and other regulatory impediments to fair housing, including:

- Reducing minimum lot size and minimum floor area requirements and increasing density allowances. The map on page 105 depicts sewered communities in Waukesha County where residential zoning district maximum density and/or minimum floor area ratio requirements may restrict affordable multifamily housing. Additionally, the map on page 104 depicts sewered communities where residential zoning district minimum lot size and/or minimum floor area ratio requirements may restrict development of affordable single-family housing. Both maps present data based on the analysis of community zoning codes by SEWRPC in 2012.
- Expanding sanitary sewer services;
- Adopting flexible zoning regulations permitting higher densities and a mix of housing types;
- Relaxing limits on alternative types of affordable housing (e.g., accessory dwellings or manufactured homes);
- Adopting inclusionary zoning provisions; and
- Amending design regulations to promote flexibility in development and construction costs.

While Waukesha County adopted the *Regional Housing Plan's* recommendations into their Comprehensive Development Plan and other cities such as Oconomowoc have reduced zoning requirements to allow for more multifamily or high density housing development, not all study area municipalities have addressed zoning impediments. As administrator of CDBG and HOME funds, Waukesha County should take a lead role in educating HOME Consortium jurisdictions and advocating that they review their regulations and reduce any excessive barriers to development. The County should host a zoning workshop for local municipalities to review findings of the SEWRPC report, discuss potential for code changes, and provide examples of communities that have successfully modified zoning code to reduce impediments to affordable housing. A parallel effort to encourage developers to offer a mix of housing types, sizes, and building materials in order to increase local affordable housing options should also be developed. Potential collaboration with SEWRPC should be explored, such as a staff member or other representative being present at a zoning workshop, or advising on other forms of outreach to HOME Consortium jurisdictions or developers.

Impediment #2: Lack of Fair Housing Knowledge

Research findings indicate a general lack of knowledge about fair housing laws and the fair housing complaint process amongst several groups within the study area. While the Metro Milwaukee Fair Housing Council's fair housing enforcement program serves Ozaukee, Washington, and Waukesha Counties, when asked where they would refer a client with a housing discrimination complaint, very few of the social service agencies and housing providers interviewed mentioned MMFHC, and most were unsure of where to refer complaints.

Similarly, the Housing and Community Development Needs Survey completed by community members as part of this research revealed that many study area residents are unsure of where to file a complaint as well. While the majority of respondents (91.4%) report knowing or somewhat knowing their fair housing rights, only 40.3% knew where to file a housing complaint. Further, of the 29 respondents who report having faced housing discrimination, only 3 pursued complaints. Of those that did not file a complaint, the most common reason was not knowing what good it would do to file.

A third study area group that may lack information about fair housing laws are landlords or rental property managers. Of the 87 housing complaints filed with HUD for the study area since 2006, the largest share (27.5%) cite refusal to rent as the fair housing issue. Additionally, of the 29 survey respondents who had faced housing discrimination, the majority (23 respondents, or 79.3%) report discrimination by a landlord or property manager. Further, stakeholders mentioned that while large property management companies typically train employees regarding fair housing laws, small-scale landlords are more likely to discriminate.

Recommendations:

Education is needed regarding fair housing laws and options for recourse when discrimination occurs. While MMFHC conducts outreach and education to several organizations in Waukesha County, more is needed. It is recommended that Waukesha County coordinate a fair housing seminar given by MMFHC (or a similar organization) and open to all sub-recipients and any other housing and social service agencies operating in the four-county study area. This seminar would allow housing and service organizations to learn more about local fair housing services and about how best to disseminate fair housing information to their clients. Staff members from study area municipalities should also be invited.

Education is also need for rental property owners and managers, especially small-scale landlords, on the requirements of the Fair Housing Act, the definitions of protected classes, discriminatory practices, and potential consequences for non-compliance. The Apartment Association of Southeastern Wisconsin offers limited education opportunities, but could play a coordinating role in the outreach and education of small-scale landlords in the study area. Support for continued testing by MMFHC (or a similar organization) is also recommended.

Impediment #3: Imbalance Between Job Centers and Affordable Housing Options

Many stakeholders identified an imbalance between the locations of affordable housing and job centers, or noted that a lack of affordable housing is likely to impede future economic development as businesses instead opt to locate in areas more affordable for their employees. SEWRPC's *Regional Housing Plan* notes that median monthly rents are high around several job centers (or anticipated job centers) in much of Waukesha County with the exception of the City of Waukesha, and in southern Ozaukee and southeastern Washington Counties. Because minority households tend to have lower incomes, they are less likely to be able to afford the higher housing costs around these

job centers and must face either disproportionately long commute times or more limited employment options.

Recommendations:

The construction of new affordable and/or mixed-income housing would accomplish the goal of increased economic opportunity and greater standard housing available near job centers throughout the MSA. As economic development proceeds, care must be taken to ensure that housing development includes a variety of types and rents/price points to meet housing demand generated by employees at a range of incomes. Density bonuses, fee waivers or other incentives for development of workforce or mixed-income housing should be explored as options to spur investment and development. Education for elected officials and other local leaders on the benefits of providing a range of housing options, including housing for the local workforce is needed to develop additional support for these initiatives. The imbalance is a regional imbalance, impacting communities throughout the Milwaukee—West Allis—Waukesha MSA, and should be addressed in a cooperative manner by all the participating jurisdictions.

Impediment #4: NIMBY/Prejudiced Attitudes

Input received through interviews and meetings with over 50 stakeholders in the four-county study area reveals that opposition to affordable housing by the general public, whether due to economic and/or racial/ethnic prejudices, is prevalent in many areas. A variety of stakeholders including elected officials, city/county staff, housing developers, and community development workers described “Not In My Back Yard” (NIMBY) sentiments and a lack of understanding about affordable, workforce, and mixed-income housing as common amongst study area residents. The *MSP Real Estate, Inc. v. City of New Berlin* case exemplified the effect negative public opinion can have on housing development. While the New Berlin Planning Commission initially approved the project and its zoning permit application, this decision was reversed following public opposition, requiring a lawsuit in order to ultimately obtain development approval.

Further, while segregation is low within the study area, the Milwaukee-Waukesha-West Allis MSA is one of the most segregated in the U.S. Prejudiced attitudes toward the development of affordable or mixed-income housing in the study area, and toward the low income or minority residents who may choose to live there, only sustains existing patterns of segregation in the region. The map on page 38 depicts the distribution of population by race and ethnicity in the MSA based on 2010 Census data.

Recommendations:

Education and awareness is imperative to alleviating NIMBYism and prejudiced attitudes. Lack of diversity and prejudiced personal beliefs create negative impacts on social conditions and discourse and can take many years to overcome. In the near term, education and awareness of both the value

of diversity and the role of affordable housing in helping low income persons secure a safe, quality place to live is especially important.

Waukesha County should develop an appropriate diversity awareness curriculum and then make it available for staff. Waukesha County should also encourage a collaboration of area nonprofit organizations and sub-recipients under the CDBG and HOME programs to integrate appropriate diversity awareness updates into organizational development training.

Separate information to educate local leaders, elected officials, and the general public in study area jurisdictions regarding what affordable, workforce and mixed-income housing is and what economic benefits they offer should also be developed. The material should identify and publicize local examples of success, such as that of the Oconomowoc School Apartments in Oconomowoc and the City Center in New Berlin. Participation in regional housing initiatives should also be encouraged.

Impediment #5: Limited Housing Options for People with Disabilities and the Aging Population

One need identified in the *Regional Housing Plan* and through stakeholder outreach conducted for this study is additional housing for people with disabilities. Demographic data indicates that this need will likely be exacerbated as Baby Boomers age and begin to face the higher disability rates common to adults over the age of 65. Although definitive data on the availability of accessible housing units in the study area is not available, a search conducted using socialserve.com revealed that of the handicap accessible properties in the four-county area, 44.1% have a wait list. The *Regional Housing Plan* estimates a regional shortage, noting that there are approximately 61,640 accessible housing units in the region, compared to 169,000 households with one or more persons with a disability.

Recommendations:

It is recommended that Waukesha County meet with disability advocates to better understand types and locations of units missing from the current accessible housing stock and to identify best practices for or examples of design of accessible units. This information should then be shared with municipal staff in jurisdictions within the HOME Consortium counties, allowing them to prioritize public funding for housing developments that meet these identified needs. For other private/market-rate projects, educate developers about and encourage them to consider these needs.

Density bonuses or other incentives for projects built according to universal design principles such that all units are handicap accessible would open up new housing options and increase housing choice. For residential developments competing for public funding, those that offer universal design, or that otherwise exceed FHA minimum accessibility requirements (either in number of accessible units provided and/or in the design of these units) should be prioritized.

Conclusion

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified that restrict the housing choice available to residents of Waukesha, Jefferson, Washington, and Ozaukee Counties. These barriers may prevent residents from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. Waukesha County and the HOME Consortium will work diligently toward achieving fair housing choice for their residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct. Each jurisdiction has an important role to play but cannot on its own bring about the change necessary to remove these impediments to fair housing choice.

The recommendations proposed in this document address impediments relative to the need for fair housing education, the availability of affordable housing, an imbalance between job centers and housing options, restrictive zoning or other regulatory requirements, limited accessible housing options, and NIMBYism/lack of understanding about affordable housing. Implementation of the recommendations can assist the four-county area in achieving the reality of an open and inclusive region that truly embraces fair housing choice for all its residents.

Appendix I

Southeastern Wisconsin Regional Planning Commission (SEWRPC)
Regional Housing Plan – Table 51 and Appendix B

A REGIONAL HOUSING PLAN FOR SOUTHEASTERN WISCONSIN: 2035



Table 51

**SUMMARY OF MINIMUM LOT AND HOME SIZE REQUIREMENTS IN
COMMUNITY ZONING ORDINANCES IN THE SOUTHEASTERN WISCONSIN REGION: 2012**

Sub-area/Community	Single Family Zoning Districts ^a		Multi-Family Zoning Districts	
	Smallest Minimum Lot Size (square feet)	Minimum Home Size (square feet) ^b	Maximum Density (units per acre) ^p	Minimum Unit Size (square feet) ^b
1				
Village of Belgium.....	12,500	1,100	13.2	950
Village of Fredonia.....	8,000	1,080	8.0	900
Town of Belgium.....	65,340	1,200	N/A	N/A
Town of Fredonia.....	7,200	1,000	N/A	N/A
2				
City of Port Washington.....	8,400	1,000	29.0	400
Village of Saukville.....	10,000	1,200	10.0	1,000
Town of Port Washington.....	43,560	1,200	N/A	N/A
Town of Saukville.....	20,000	1,500	N/A	N/A
3				
City of Cedarburg.....	8,400	1,100	13.2	800
Village of Grafton.....	7,000	1,250	8.0 ^c	--
Town of Cedarburg.....	40,000	1,200	N/A	N/A
Town of Grafton.....	40,000	1,250	N/A	N/A
4				
City of Mequon.....	21,780	1,400	6.2	1,100
Village of Thiensville.....	6,800	1,000	11.5	675
Ozaukee County.....	N/A	N/A	N/A	N/A
5				
Village of Kewaskum.....	7,200	1,000	14.5	650
Town of Farmington.....	40,000	1,200	N/A	N/A
Town of Kewaskum.....	43,560	1,200	N/A	N/A
6				
City of West Bend.....	7,200	1,000	15.0	750
Village of Newburg.....	10,000	1,150	10.9	800
Town of Barton.....	15,000	1,400	15.0	950
Town of Trenton.....	12,000	1,000	2.7	800
Town of West Bend.....	43,560	1,200	N/A	N/A
7				
Town of Addison.....	12,000	1,200	10.9 ^d	900 ^d
Town of Wayne.....	87,120	1,200	2.2	900
8				
Village of Jackson.....	8,000	900	12.4 ^d	700 ^d
Town of Jackson.....	60,000	1,200	2.2	900
9				
City of Hartford.....	5,000	750	14.0	700
Village of Slinger.....	7,200	950	9.7 ^d	800 ^d
Town of Hartford.....	12,000	1,000	N/A	N/A
Town of Polk.....	60,000	1,200	N/A	N/A
10				
Village of Germantown.....	10,000	1,000	10.0	650
Town of Germantown.....	130,680	1,400	N/A	N/A
11				
Village of Richfield.....	10,890	1,300	4.0	1,100
Town of Erin.....	65,340	1,200	N/A	N/A
Washington County.....	N/A	N/A	N/A	N/A

Table 51 (continued)

Sub-area/Community	Single Family Zoning Districts ^a		Multi-Family Zoning Districts	
	Smallest Minimum Lot Size (square feet)	Minimum Home Size (square feet) ^b	Maximum Density (units per acre) ^b	Minimum Unit Size (square feet) ^b
12				
City of Glendale.....	7,200	1,000	12.1	--
Village of Bayside.....	22,000	1,500	N/A	N/A
Village of Brown Deer.....	10,000	1,100	8.7 ^d	1,000 ^d
Village of Fox Point	10,500	--	4.1	--
Village of River Hills	43,560	--	N/A	N/A
Village of Shorewood	4,500	1,200	72.6	750
Village of Whitefish Bay.....	4,800	--	51.2	650
13				
City of Milwaukee	3,600	--	290.4	--
14				
City of Milwaukee	3,600	--	290.4	--
15				
City of Milwaukee	3,600	--	290.4	--
16				
City of Milwaukee	3,600	--	290.4	--
17				
City of Greenfield.....	7,200	1,200	16.0 ^d	800 ^d
City of Wauwatosa	6,000	1,100	21.8	900
City of West Allis	4,800	--	54.5	--
Village of Greendale.....	8,400	1,100	10.9 ^d	800 ^d
Village of Hales Corners.....	10,000	--	12.4 ^d	-- ^d
Village of West Milwaukee	4,800	1,000	29.0	600
18				
City of Cudahy.....	7,200	1,100	40.0	600
City of St. Francis	5,400	1,200	24.9 ^d	1,400 ^d
City of South Milwaukee.....	7,200	1,125	72.6 ^d	400 ^d
19				
City of Franklin	11,000	1,250	8.0 ^d	950 ^d
City of Oak Creek.....	10,000	850	9.7	700
Milwaukee County.....	N/A	N/A	N/A	N/A
20				
Village of Butler	4,800	1,000	14.5	500
Village of Lannon.....	15,000	1,100	9.0	800
Village of Menomonee Falls.....	7,200	900	10.4	900
21				
City of Brookfield	22,500	1,400	5.8	1,000
Village of Elm Grove.....	15,000	1,100	5.8	1,000
Town of Brookfield.....	15,000	1,100	7.3	950
22				
City of New Berlin.....	15,000	1,200	6.7	800
23				
City of Muskego.....	15,000	1,200	8.7	--
24				
Village of Sussex.....	7,200	1,200	12.4	750
Town of Lisbon.....	30,000	1,300	4.0	900
25				
City of Delafield	7,900	1,000	12.4	1,000
City of Oconomowoc	7,260	--	12.0	--
Village of Chenequa.....	87,120	2,000	N/A	N/A

Table 51 (continued)

Sub-area/Community	Single Family Zoning Districts ^a		Multi-Family Zoning Districts	
	Smallest Minimum Lot Size (square feet)	Minimum Home Size (square feet) ^b	Maximum Density (units per acre) ^b	Minimum Unit Size (square feet) ^b
25 (continued)				
Village of Hartland	8,000	1,200	14.5	900
Village of Lac La Belle	20,000	1,200	N/A	N/A
Village of Merton	20,000	1,300	5.8	1,050
Village of Nashotah	21,780	1,200	N/A	N/A
Village of Oconomowoc Lake	30,000	1,500	N/A	N/A
Village of Summit	35,000	1,400	6.0	800
Town of Delafield	20,000	1,200	N/A	N/A
Town of Merton	20,000	1,100	N/A	N/A
Town of Oconomowoc ^e	20,000	1,100	5.4 ^d	1,000 ^d
26				
City of Pewaukee	12,500	1,100	12.0	650
City of Waukesha	8,000	1,000	14.5	600
Village of Pewaukee	10,500	1,200	12.0	950
Town of Waukesha	20,000	1,400	N/A	N/A
27				
Village of Big Bend	20,000	1,600	2.9	800
Village of Mukwonago	12,000	1,200	8.0	950
Village of North Prairie	7,200	1,000	4.4	1,000
Village of Wales	30,000	1,000	8.0 ^f	1,000 ^f
Town of Genesee ^e	20,000	1,100	5.4 ^d	1,000 ^d
Town of Mukwonago	30,000	1,100	N/A	N/A
Town of Vernon ^e	20,000	1,100	5.4 ^d	1,000 ^d
28				
Village of Dousman	12,000	1,200	3.6 ^d	1,500 ^d
Village of Eagle	20,000	1,200	6.2	850
Town of Eagle	20,000	1,100	N/A	N/A
Town of Ottawa ^e	20,000	1,100	5.4 ^d	1,000 ^d
Waukesha County ^e	20,000	1,100	5.4 ^d	1,000 ^d
29				
Village of Caledonia	7,200	900 ^g	10.9	--
Village of Elmwood Park	10,200	1,500	8.7 ^h	-- ^h
Village of Mt. Pleasant	7,200	800	34.9	700
Village of Sturtevant	9,000	1,200	7.3 ^d	750 ^d
Village of Wind Point	8,000	1,200	10.9	--
30				
City of Racine ^h	6,000	--	96.8	--
Village of North Bay	21,780	1,700	N/A	N/A
31				
Village of Rochester	10,000	1,200	7.3	900
Village of Union Grove	8,000	1,000	14.5	750
Village of Waterford	11,000	1,200	9.7	1,050
Town of Dover ⁱ	10,000	800	5.4	--
Town of Norway ^j	7,200	1,400 ^k	14.5	--
Town of Raymond ^d	40,000	800	N/A	N/A
Town of Waterford ^d	13,500	800	14.5	--
Town of Yorkville ^l	40,000	1,400 ^k	14.5	--
32				
City of Burlington	8,000	--	16.3	--
Town of Burlington ^k	10,000	800	5.4	--
Racine County ^j	7,200	800	14.5	--

Table 51 (continued)

Sub-area/Community	Single Family Zoning Districts ^a		Multi-Family Zoning Districts	
	Smallest Minimum Lot Size (square feet)	Minimum Home Size (square feet) ^b	Maximum Density (units per acre) ^p	Minimum Unit Size (square feet) ^b
33				
Village of Pleasant Prairie	6,000	1,200	9.6	1,000
Town of Somers ^{l,m}	20,000	1,200	8.7	750
34				
City of Kenosha	5,000	--	59.9	--
35				
Village of Bristol ⁿ	6,000	800	8.7	750
Village of Paddock Lake	8,000	1,250	12.4	720
Village of Silver Lake	12,500	1,250	6.2	800
Village of Twin Lakes	8,000	--	8.7	--
Town of Brighton ^{l,m}	40,000	1,200	N/A	N/A
Town of Paris ^{l,m}	40,000	1,200	N/A	N/A
Town of Randall ^{l,m}	10,000	1,000	N/A	N/A
Town of Salem ^{l,m}	10,000	1,000	8.7	750
Town of Wheatland ^{l,m}	40,000	1,200	N/A	N/A
Kenosha County ^{l,m}	6,000	800	14.5	500
36				
Village of East Troy	5,000	--	10.0	--
Town of East Troy ^{o,p}	15,000	-- ^q	4.0	-- ^q
Town of Spring Prairie ^{o,p}	40,000	-- ^q	4.0	-- ^q
Town of Troy ^{o,p}	40,000	-- ^q	4.0	-- ^p
37				
City of Whitewater	8,000	--	14.5 ^d	-- ^d
Town of La Grange ^{o,p}	40,000	1,000 ^f	N/A	N/A
Town of Richmond ^{o,p}	40,000	-- ^q	N/A	N/A
Town of Whitewater ^{o,p}	40,000	-- ^q	4.0	-- ^q
38				
City of Delavan	8,000	1,200	18.2 ^d	800 ^d
City of Elkhorn	8,000	1,000	16.0	--
City of Lake Geneva	9,000	960 ^s	8.0 ^d	960 ^{d,s}
Village of Darien	8,000	960 ^s	12.0	960 ^s
Village of Genoa City	10,000	1,200	13.6	800
Village of Sharon	8,000	--	17.4	--
Town of Bloomfield ^t	15,000	-- ^q	4.0	-- ^q
Town of Darien ^{o,p}	15,000	-- ^q	4.0	-- ^q
Town of Delavan ^{o,p}	15,000	-- ^q	4.0	-- ^q
Town of Geneva ^{o,p}	15,000	960 ^u	4.0	960 ^u
Town of Lafayette ^{o,p}	40,000	-- ^q	4.0	-- ^q
Town of Linn ^{o,p}	40,000	-- ^q	4.0	-- ^q
Town of Lyons ^{o,p}	15,000	-- ^q	4.0	-- ^q
Town of Sharon ^{o,p}	40,000	-- ^q	N/A	N/A
Town of Sugar Creek ^{o,p}	40,000	-- ^q	4.0	-- ^q
39				
Village of Fontana on Geneva Lake	5,000	1,000	8.7	800
Village of Walworth	11,900	1,450	8.7	1,040
Village of Williams Bay	12,000	1,200	18.0	800
Town of Walworth ^{o,p}	15,000	-- ^q	4.0	-- ^q
Walworth County ^{o,p}	15,000	-- ^q	4.0	-- ^q

Table 51 (continued)

NOTES: This table provides a summary of residential zoning districts. It lists residential zoning districts which allow, as a principal use, various types of residential development in each community. Zoning districts that allow multi-family residential development as a conditional use are footnoted. Unless footnoted otherwise, this table does not reflect special zoning provisions for senior housing, manufactured housing or mobile homes, housing conversions, or planned unit developments. Agricultural, conservancy, and business districts which permit residences in addition to the primary agricultural or business uses are not included on this table.

The smallest lot and home sizes allowed for single-family homes in communities with their own zoning ordinance are reflected on this table, except for residential zoning districts that apply only to existing platted areas or to historic lake communities. The following zoning districts are excluded: the R-8 Hamlet and Waterfront Residential Neighborhood Conservation District in the Town of Barton; the R-L Residential Lake District in the Town of Eagle; the VR Village Residence District in the City of Franklin; the R-1 Single-Family Residential (existing) and R-2 General Residence (existing) in the Village of Genoa City; the ROP Single-Family Residence Original Plat District in the Village of Lannon; the R-40E Residential Existing Limited District in the Village of Mt. Pleasant; the R-3 Residential District in the Town of Mukwonago; the ERS-1, ERS-2, and ERS-3 Existing Suburban Residence Districts and the RL-1, RL-2, and RL-3 Existing Lakeshore Residence Districts in the City of Muskego; the R-5 Medium-Density Single Family Residential District in the City of New Berlin; the R-4 Single-Family Residential District in the Village of Newburg; the R-1 Single Family Residential and the R-2 Single-Family and Duplex Residential Districts in the City of St. Francis; and the RF-6 Village Residential and SF-CPP Cedar Point Park Districts in the Village of Williams Bay. In towns regulated under County zoning ordinances (all towns in Kenosha and Racine Counties; all towns except the Town of Bloomfield in Walworth County; and the Towns of Genesee, Oconomowoc, Ottawa, and Vernon in Waukesha County), the smallest lot and home sizes allowed by zoning districts currently mapped in the town are reflected on this table.

Several counties and communities allow planned unit developments or conservation subdivisions in their zoning and/or subdivision ordinances, which may allow smaller lot sizes and/or higher densities than those listed in this table. Table 53 and Appendix C provide information on planned unit development and conservation subdivision regulations, respectively.

In areas not served by a sanitary sewerage system, larger minimum lot sizes may be required to meet State and County requirements for private onsite wastewater treatment systems (POWTS).

This table is a summary and should not be used as a guide to answer zoning-related questions. Refer to municipal zoning ordinances and maps for specific zoning information. Municipal zoning ordinances used for this analysis date from 2000 to 2012.

On this table, "-" means that no regulation is specified in the zoning ordinance. "N/A" means that the community or county does not have a zoning ordinance, that the county or community has a zoning ordinance that does not include a multi-family residential district, or, for towns under county zoning, no areas are designated for multi-family development on the town zoning map.

^aIncludes single-family detached dwellings only. Single-family attached dwellings are included as multi-family.

^bIf the minimum unit size and/or maximum density specified in a community's zoning ordinance varies by unit size, the figure provided is for a two-bedroom dwelling.

^cMulti-family dwellings may be permitted at a gross density of 11.0 units per acre, or a net density of 8.0 units per acre, as a conditional use in the Village of Grafton.

^dMulti-family dwellings may be permitted only as a conditional use. In the Village of Slinger and City of Whitewater, a conditional use permit is required for five or more units; in the City of Lake Geneva, a conditional use permit is required for five to 10 units.

^eThe Towns of Genesee, Oconomowoc, Ottawa, and Vernon are regulated under the Waukesha County zoning ordinance. The County zoning ordinance allows multi-family dwellings as a conditional use in the R-3 zoning district. All other Towns in Waukesha County have adopted a separate general Town zoning ordinance. All Towns in the County are regulated under the County shoreland zoning ordinance.

^fMulti-family dwellings may be allowed as part of a planned unit development.

^gMinimum floor area requirements for single- and two-family dwellings in the Village of Caledonia are established in the Village Building Code ordinance.

^hMulti-family condominiums with a minimum of 5,000 square feet of lot area per dwelling unit may be allowed as part of a Planned Development Project in the Planned Residential (PRD) zoning district if a rezoning is approved by the Village Board. No minimum home size is specified in the ordinance.

ⁱThe area of the City of Racine containing Johnson Park is included in Sub-area 29.

^jAll towns in Racine County are regulated under the Racine County zoning ordinance. Minimum lot sizes and maximum densities listed are based on existing zoning in each Town as of March 2010. Generally, a minimum lot size of 40,000 square feet is required in areas not served by a sanitary sewerage system. The County zoning ordinance requires a minimum core area of living space of 800 square feet for single- and two-family dwellings. No minimum floor area is specified for multi-family dwellings.

^kMinimum floor area requirements for single- and two-family dwellings in the Towns of Norway and Yorkville are established in their respective Town land division ordinances.

^lAll towns in Kenosha County are regulated under the Kenosha County zoning ordinance. Minimum lot sizes and maximum densities listed are based on existing zoning in each Town as of May 2008. Generally, a minimum lot size of 40,000 square feet is required in areas not served by a sanitary sewerage system. Minimum single-family lot sizes exclude the R-12 Mobile Home Park zoning district, which requires 7,500 square feet per home. Existing R-12 zoning occurs in the Village of Bristol and Towns of Brighton, Somers, and Wheatland.

^mUnder the Kenosha County zoning ordinance, new subdivisions with lot sizes of 6,000 square feet, which are permitted in the R-6 zoning district, may be permitted only if the area proposed to be rezoned to R-6 abuts a residential subdivision located in a city of the second class that contains individual parcels of 6,000 square feet per unit or less, and if the subdivision is served by a sanitary sewerage system. In all other cases, the minimum lot size allowed for new subdivisions is 10,000 square feet (R-5 zoning district).

Table 51 (continued)

ⁿThe Village of Bristol was incorporated from a portion of the Town of Bristol in December 2009. The remaining portions of the Town were annexed into the Village of Bristol in June 2010. The Village of Bristol has adopted the Kenosha County zoning ordinance as the Village zoning ordinance.

^oWith the exception of the Town of Bloomfield, all towns in Walworth County are regulated under the County zoning ordinance.

^pMinimum lot sizes and maximum densities listed are based on existing zoning in each Town as of March 2010. Generally, a minimum lot size of 40,000 square feet is required in areas not served by a sanitary sewerage system. Minimum single-family lot sizes exclude the R-6 Planned Mobile Home Park zoning district, which allows up to five dwelling units per net developable acre, and the R-7 Mobile Home Subdivision zoning district, which requires 15,000 square feet per home in areas served by a sanitary sewerage system and a minimum of 40,000 square feet in areas not served by sanitary sewer. Existing R-6 zoning occurs in the Towns of Darien, Delavan, Geneva, Lyons, Richmond, and Troy. There was no existing R-7 zoning in the County as of March 2010.

^qWith respect to minimum floor area requirements, the Walworth County zoning ordinance requires that single-family and two-family dwellings have a core area of living space of at least 22 feet by 22 feet, equivalent to 484 square feet.

^rMinimum floor area requirements for single-family dwellings in the Town of LaGrange are established in the Town land division ordinance.

^sThe community zoning ordinance specifies a "minimum dwelling core dimension" of 24 feet by 40 feet (960 square feet).

^tThe Town of Bloomfield withdrew from County zoning in 2010 and is preparing an independent Town zoning ordinance. The Town has adopted the Walworth County zoning ordinance as an interim ordinance until the Town ordinance is completed and adopted.

^uMinimum floor area requirements for all new dwellings in the Town of Geneva are established in the Town Building Ordinance.

Source: County and local zoning ordinances and SEWRPC.

communities are located within sewer service areas. Most of the communities that do not allow multi-family dwellings as a principal use are towns that do not have the infrastructure, such as sanitary sewer, to provide service to more intensive residential uses. Towns under County zoning in Kenosha, Racine, and Walworth Counties typically do not have any areas zoned for multi-family use because they lack sanitary sewer service. The County zoning ordinances include multi-family zoning districts that could be applied if sewer service is provided and if the rezoning is consistent with county and local comprehensive plans.

Minimum Floor Area Requirements

Community zoning ordinances also include minimum floor area requirements that affect the size and, therefore, the cost of housing units. Minimum floor area requirements should be designed to ensure the provision of decent, safe, and sanitary housing and reduce overcrowding; however, many communities include requirements that exceed the amount of space that is necessary to avoid these housing problems. Minimum floor area requirements generally correlate to minimum lot size requirements, as shown by Table 51. Zoning districts with larger minimum lot size requirements often include larger minimum floor area requirements. This further increases the cost of housing in many of the Region's outlying communities.

Conditional Uses

Community zoning ordinances typically identify principal uses and conditional uses in each zoning district. Principal uses are typically allowed subject to the restrictions applicable to the zoning district. Conditional uses require additional review and scrutiny compared to that of principal uses because of the demands put on infrastructure or other factors that make the use more intense than the principal uses allowed in the district. A conditional use approval typically requires a case-by-case review and often a public hearing before the local plan commission, and approval is often contingent on specific "conditions" attached to the permit intended to mitigate adverse impacts of the conditional use on the surrounding area. Concerns have been raised that the conditional use process can be used to prevent certain land uses, such as multi-family residential development, through excessive conditions of approval or the length of the review period. Map 69 shows communities in the Region that require a conditional use permit for the development of multi-family housing.

**Table B-3
OZAUKEE COUNTY**

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
City of Cedarburg	Rs-1 Single-Family Residential District	20,000 square feet	1,600; 1,000 first floor for two-story; 550 per floor for tri-level
	Rs-2 Single-Family Residential District	15,000 square feet	1,600; 1,000 first floor for two-story; 700 per floor for tri-level
	Rs-3 Single-Family Residential District	12,000 square feet	1,300; 850 first floor for two-story; 425 per floor for tri-level
	Rs-4 Single-Family Residential District	10,000 square feet	1,200; 800 first floor for two-story; 400 per floor for tri-level
	Rs-5 Single-Family Residential District	8,400 square feet	1,100; 800 first floor for two-story; 400 per floor for tri-level
	Rs-5 Single-Family/Two-Family Residential District	8,400 square feet	Single-family: 1,100; 750 first floor for two-story; Two-family: 750 per unit
	Rs-7 Low-Density Single-Family Residential District	20,000 square feet	1,600; 1,000 first floor for two-story; 550 per floor for tri-level
	Rs-8 Low-Density Single-Family Residential District	40,000 square feet	1,600; 1,000 first floor for two-story; 550 per floor for tri-level
	RD-1 Two-Family Residential District	12,000 square feet	Single-family : 1,300; 850 first floor for two-story; 425 per floor for tri-level; Two-family: 1,050 per unit; 1,050 first floor for two-story structures; add 100 to total for structures without a basement of at least 200 square feet
	RM-1 Multiple-Family Residential District	12,000 square feet; lot area of 4,000 square feet per one-bedroom unit and 5,000 square feet per two-bedroom unit	One-bedroom: 500 per unit; Two-bedroom: 850 square feet per unit
RM-2 Multiple-Family Residential District	12,000 square feet; lot area of 2,700 square feet per one-bedroom unit and 3,300 square feet per two-bedroom unit	One-bedroom: 500 per unit; Two-bedroom: 800 square feet per unit	
City of Mequon	R-1 Rural Residential Detached District	Five acres	1,800
	R-1B Rural Residential Detached District	2.5 acres	1,600
	R-2 Rural Residential Detached District	Two acres	1,800
	R-2B Suburban Residential Detached District	1.5 acres	1,400
	R-3 Suburban Residential Detached District	One acre	1,800
	R-4 Suburban Residential Detached District	32,670 square feet	1,600
	R-5 Suburban Residential Detached District	21,780 square feet	1,400
	R-6 Suburban Residential Attached District	One acre	One-bedroom: 1,000 per unit; Two-bedroom: 1,200 per unit; Three-bedroom: 1,400 per unit
R-M Multiple-Family Residential District	Minimum lot area per unit: One-bedroom: 6,000 square feet; Two-bedroom: 7,000 square feet; Three-bedroom: 10,000 square feet	One-bedroom: 900 per unit; Two-bedroom: 1,100 per unit; Three-bedroom: 1,300 per unit	
City of Port Washington ^a	R-1 Single-Family Residential District	45,000 square feet	1,250 for one story one to four bedroom; 1,400 for two story four bedroom; 1,450 for one to two story five bedroom; 1,600 for three story five bedroom; 1,650 for one to three story six bedroom; 1,750 for one to three story seven bedroom; 1,800 for four story six bedroom; 1,850 for four story seven bedroom; 1,950 for one to four story eight bedroom; 2,000 for five + story eight + bedroom
	RS-1 Single-Family Residential District	15,000 square feet	1,250 for one story one to four bedroom; 1,400 for two story four bedroom; 1,450 for one to two story five bedroom; 1,600 for three story five bedroom; 1,650 for one to three story six bedroom; 1,750 for one to three story seven bedroom; 1,800 for four story six bedroom; 1,850 for four story seven bedroom; 1,950 for one to four story eight bedroom; 2,000 for five + story eight + bedroom
	RS-2 Single-Family Residential District	12,000 square feet	1,250 for one story one to four bedroom; 1,250 for two story four bedroom; 1,300 for one to two story five bedroom; 1,450 for three story five bedroom; 1,500 for one to three story six bedroom; 1,600 for one to three story seven bedroom; 1,650 for four story six bedroom; 1,700 for four story seven bedroom; 1,800 for one to four story eight bedroom; 1,850 for five+ story eight+ bedroom

Table B-3 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
City of Port Washington ^a (continued)	RS-3 Single-Family Residential District	10,000 square feet	1,150 for one story one to four bedroom; 1,150 for two story four bedroom; 1,225 for one to two story five bedroom; 1,300 for three story five bedroom; 1,350 for one to three story six bedroom; 1,450 for one to three story seven bedroom; 1,500 for four story six bedroom; 1,550 for four story seven bedroom; 1,650 for one to four story eight bedroom; 1,700 for five+ story eight+ bedroom
	RS-4 Single-Family Residential District	8,400 square feet	1,000 for one story one to four bedroom; 1,000 for two story four bedroom; 1,075 for one to two story five bedroom; 1,150 for three story five bedroom; 1,200 for one to three story six bedroom; 1,300 for one to three story seven bedroom; 1,350 for four story six bedroom; 1,400 for four story seven bedroom; 1,500 for one to four story eight bedroom; 1,550 for five+ story eight+ bedroom
	RS-5 Single- and Two-Family Residential District	8,400 square feet; minimum lot area of 4,200 square feet per unit	1,000 (single-family) 650 (two-family) for one story one to four bedroom; 1,000 (single-family) 800 (two-family) for two story four bedroom; 1,075 (single-family) 850 (two-family) for one to two story five bedroom; 1,150 (single-family) 1,000 (two-family) for three story five bedroom; 1,200 (single-family) 1,050 (two-family) for one to three story six bedroom; 1,300 (single-family) 1,150 (two-family) for one to three story seven bedroom; 1,350 (single-family) 1,200 (two-family) for four story six bedroom; 1,400 (single-family) 1,250 (two-family) for four story seven bedroom; 1,500 (single-family) 1,350 (two-family) for one to four story eight bedroom; 1,550 (single-family) 1,400 (two-family) for five+ story eight+ bedroom
	RS-6 Single- and Two-Family Residential District	10,000 square feet; minimum lot area of 5,000 square feet per unit	1,000 (single family) 650 (two-family) for one story one to four bedroom; 1,000 (single-family) 800 (two-family) for two story four bedroom; 1,075 (single-family) 850 (two-family) for one to two story five bedroom; 1,150 (single-family) 1,000 (two-family) for three story five bedroom; 1,200 (single-family) 1,050 (two-family) for one to three story six bedroom; 1,300 (single-family) 1,150 (two-family) for one to three story seven bedroom; 1,350 (single-family) 1,200 (two-family) for four story six bedroom; 1,400 (single-family) 1,250 (two-family) for four story seven bedroom; 1,500 (single-family) 1,350 (two-family) for one to four story eight bedroom; 1,550 (single-family) 1,400 (two-family) for five+ story eight+ bedroom
	RM-1 Multi-Family Residential District	7,000 square feet; minimum lot area of 3,500 square feet per unit	-
	RM-2 Multi-Family Residential District	Minimum lot area per unit (square feet): 3,200 for one-bedroom; 3,600 for two bedroom; 4,000 for three bedroom	650 for one story one to four bedroom; 800 for two story four bedroom; 850 for one to two story five bedroom; 1,000 for three story five bedroom; 1,050 for one to three story six bedroom; 1,150 for one to three story seven bedroom; 1,200 for four story six bedroom; 1,250 for four story seven bedroom; 1,350 for one to four story eight bedroom; 1,400 for five+ story eight+ bedroom
	RM-3 Multi-Family Residential District	Minimum lot area per unit (square feet): 2,700 for one-bedroom; 3,000 for two bedroom; 3,300 for three bedroom	350 for one story one bedroom; 400 for one story two bedroom; 500 for one story three bedroom; 650 for one story four bedroom; 800 for two story four bedroom; 850 for one to two story five bedroom; 1,000 for three story five bedroom; 1,050 for one to three story six bedroom; 1,150 for one to three story seven bedroom; 1,200 for four story six bedroom; 1,250 for four story seven bedroom; 1,350 for one to four story eight bedroom; 1,400 for five+ story eight+ bedroom

Table B-3 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
City of Port Washington ^a (continued)	RM-4 Multi-Family Residential District	Minimum lot area of 1,500 square feet per unit	Same as RM-3
Village of Belgium	RD-1 Single-Family Residential District	12,500 square feet	Two-bedroom: 1,100; Three-bedroom: 1,300; Four-bedroom: 1,500; add 200 per bedroom additional to four
	RD-2 Two-Family Residential District	15,000 square feet	Single-family same as RD-1; Two-family two-bedroom: 900; Two-family three-bedroom: 1,000
	RM-1 Multi-Family Residential District	12,000 square feet; minimum lot area of 4,000 square feet per unit for one-bedroom; 5,000 for two- or more bedroom	One-bedroom unit: 850; Two- or more bedroom unit: 1,000
	RM-2 Multi-Family Residential District	12,000 square feet; minimum lot area of 3,000 square feet per unit for one-bedroom; 3,300 for two- or more bedroom	One-bedroom unit: 800; Two- or more bedroom unit: 950
Village of Fredonia ^a	RS-1 Single-Family Residential District	16,000 square feet (17,000 for corner lot)	1,500
	RS-2 Single-Family Residential District	11,500 square feet (12,500 for corner lot)	1,350
	RS-3 Single-Family Residential District	8,000 square feet (9,000 for corner lot)	1,080
	RS-4 Large Lot Single-Family Residential District	20,000 square feet (21,500 for corner lot)	2,000
	RS-5 Estate Single-Family Residential District	40,000 square feet	2,500
	RD-1 Two-Family Residential District	12,500 square feet	1,200
	RD-2 Two-Family Residential District	7,200 square feet	1,000
	RD-3 Single-Family Attached Residential District	9,000 square feet	1,000
	RM-1 Multi-Family Residential District	12,500 square feet; maximum density of 6.0 units per net acre	One-bedroom unit: 800; Two-bedroom unit: 900; Three-bedroom unit: 1,000
	RM-2 Multi-Family Residential District	11,000 square feet; maximum density of 8.0 units per net acre	One-bedroom unit: 900; Two-bedroom unit: 1,000; Three-bedroom unit: 1,100
Village of Grafton ^a	R-RE Rural Estate Single-Family Residential District	Three acres	1,600 plus 250 per each bedroom additional to three; 1,100 first floor and 1,900 total for multi-story plus 100 per each bedroom additional to three; add 250 to first floor area and total area for dwellings with basements under 600
	R-E Estate Single-Family Residential District	40,000 square feet	1,600 plus 250 per each bedroom additional to three; 1,100 first floor and 1,900 total for multi-story plus 100 per each bedroom additional to three; add 250 to first floor area and total area for dwellings with basements under 600
	R-1 Suburban Estate Single-Family Residential District	18,000 square feet	1,600 plus 250 per each bedroom additional to three; 1,100 first floor and 1,900 total for multi-story plus 100 per each bedroom additional to three; add 250 to first floor area and total area for dwellings with basements under 600
	R-S Suburban Single-Family Residential District	15,000 square feet	1,600 plus 250 per each bedroom additional to three; 1,050 first floor and 1,900 total for multi-story plus 100 per each bedroom additional to three; add 250 to first floor area and total area for dwellings with basements under 600
	R-2 Single-Family Residential District	10,000 square feet	1,250 plus 250 per each bedroom additional to three; 950 first floor and 1,550 total for multi-story plus 100 per each bedroom additional to three; add 250 to first floor area and total area for dwellings with basements under 600
	R-3 Urban Single-Family Residential District	7,000 square feet	1,250 plus 250 per each bedroom additional to three; 950 first floor and 1,550 total for multi-story plus 100 per each bedroom additional to three; add 250 to first floor area and total area for dwellings with basements under 600
	R-4 Duplex/Townhouse Residential District	15,000 square feet	1,150 plus 150 per each bedroom additional to three; add 150 to total area for dwellings with basements under 600

Table B-3 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Village of Grafton ^a (continued)	R-5 Suburban Two-Family Residential District	10,000 square feet	1,150 plus 150 per each bedroom additional to three; add 150 to total area for dwellings with basements under 600
	R-6 Urban Two-Family Residential District	8,000 square feet	1,150 plus 150 per each bedroom additional to 3; add 150 to total area for dwellings with basements under 600
	MFR-1 Medium Density Multi-Family Residential District ^b	Minimum lot area of 6,000 square feet per unit; maximum density of 8.0 units per net acre	650 square feet for a one-bedroom dwelling, plus an additional 150 square feet for each additional bedroom
	MFR-2 Low Density Multi-Family Residential District ^b	Minimum lot area of 6,000 square feet per unit; maximum density of 8.0 units per net acre	650 square feet for a one-bedroom dwelling, plus an additional 150 square feet for each additional bedroom
Village of Saukville ^a	R-1 Single-Family Residential District	20,000 square feet	1,600
	R-2 Single-Family Residential District	12,000 square feet	1,400
	R-3 Single-Family Residential District	10,000 square feet	1,200
	R-4 Two-Family Residential District	14,500 square feet; 7,250 square feet per unit	1,200 per unit
	R-5 Multi-Family Residential District	22,000 square feet; minimum lot area of 3,630 square feet for efficiency unit; 4,356 square feet for one-bedroom unit; 5,445 square feet for two or more bedroom units	Efficiency: 500 per unit; One-bedroom: 850 per unit; Two or more bedroom: 1,000 per unit
	R-C Condominium Residential District	40,000 square feet; minimum lot area of 4,356 square feet for one-bedroom unit; 5,445 square feet for two or more bedroom units	One-bedroom: 1,000 per unit; Two or more bedroom: 1,200 per unit
Village of Thiensville	R-1 Single-Family Residential District	13,500 square feet	1,200
	R-2 Single-Family Residential District	6,800 square feet	1,000
	R-3 Two-Family Residential District	15,000 square feet	1,000 per unit
	R-4 Multi-Family Residential District	15,000 square feet; minimum lot area of 3,800 square feet per unit	Efficiency/one-bedroom: 525 per unit; Two or more bedroom: 675 per unit
	R-5 Multi-Family Residential District	15,000 square feet; minimum lot area of 1,980 square feet for dwellings for the elderly and 3,800 square feet for the non-elderly	Same as R-4
Town of Belgium	R-1 Single-Family Residential District	1.5 acres	1,200
Town of Cedarburg ^a	R-1 Single-Family Residential District	80,000 square feet	1,800
	R-2 Single-Family Residential District	40,000 square feet	1,500
	R-3 Single-Family Residential District	40,000 square feet	1,200
	E-1 Estate District	Four acres	1,800
	CR-A Countryside Residential A District	One acre; maximum density of one dwelling unit per 4.5 acres	1,500
	CR-B Countryside Residential B District	One acre; maximum density of one dwelling unit per 4.5 acres	1,500
	TR Transitional Residential District	1.5 acres; maximum density of one dwelling unit per 2.25 acres	1,500
	TR-2 Transitional Residential District	One acre; maximum density of one dwelling unit per 2.0 acres	1,500
Town of Fredonia	R-1 Single-Family Residential District	Three acres	1,400
	R-2 Single-Family Residential District	One acre	1,200
	R-3 Single-Family Residential District	20,000 square feet	1,200
	R-4 Single-Family Residential District	7,200 square feet	1,000
	R-5 Mobile Home Park District	5,000 square feet	--
Town of Grafton ^a	R-1 Residential District	Five acres	3,000
	R-2 Residential District	Three acres	1,250
	R-3 Residential District	40,000 square feet	1,250
	R-4 Conservation Development District	21,780 square feet when 70 percent of common open space is provided; One acre when 60 percent of common open space is provided	--
Town of Port Washington ^a	R-1 Residential District	1.5 acres	2,000
	R-2 Residential District	One acre	1,200

Table B-3 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Town of Saukville ^a	R-1 Waterfront Residential Neighborhood Conservation District	40,000 square feet; Maximum density of 1.00 dwelling unit per acre	1,500 plus 150 per each bedroom additional to three; 1,100 first floor and 1,900 total for multi-story plus 150 per each bedroom additional to three; add 150 to first floor area and total area for dwellings with basements under 600
	R-2 Single-Family Residential Neighborhood Conservation District	40,000 square feet; Maximum density of 1.00 dwelling unit per acre	1,500 plus 150 per each bedroom additional to three; 1,100 first floor and 1,900 total for multi-story plus 150 per each bedroom additional to three; add 150 to first floor area and total area for dwellings with basements under 600
	R-3 Waterfront Residential Neighborhood Conservation District	20,000 square feet; Maximum density of 4.75 dwelling units per acre	1,500 plus 150 per each bedroom additional to three; 1,100 first floor and 1,900 total for multi-story plus 150 per each bedroom additional to three; add 150 to first floor area and total area for dwellings with basements under 600
	R-4 Transitional Urban to Suburban/Rural Residential District	20,000 square feet; Maximum gross density of 0.92 and net density of 1.68 dwelling units per acre	1,600 plus 200 per each bedroom additional to three; 900 first floor and 1,800 total for multi-story plus 200 per each bedroom additional to three; add 200 to first floor area and total area for dwellings with basements under 600

NOTES: This table provides a summary of residential zoning districts in Ozaukee County. It lists residential zoning districts which allow various types of residential development as a principal use in each community. This table does not reflect conditional uses or special zoning provisions for senior housing, manufactured housing or mobile homes, housing conversions, or planned unit developments. Agricultural, conservancy and business districts which permit residences in addition to the primary agricultural and business uses are not included on this table. See Table 53 for information regarding PUD regulations.

This table is a summary and should not be used as a guide to answer zoning-related questions. Refer to municipal zoning ordinances and maps for specific zoning information.

On this table, "-" means that no regulation is specified in the zoning ordinance.

^aRefer to the municipal zoning ordinance for information regarding minimum first floor area.

^bTwo-family dwellings are allowed as a principal use in the Village of Grafton; multi-family buildings with three or more units require approval of a conditional use permit.

Source: SEWRPC.

Table B-6

WASHINGTON COUNTY

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
City of Hartford	Rs-1 Single-Family Residential District	40,000 square feet	850 minimum for one- or two-bedroom units; 1,000 minimum for three-bedroom units; 1,150 minimum for four or more bedroom units; 700 minimum on main entry level; 100 minimum per bedroom
	Rs-2 Single-Family Residential District	20,000 square feet	Same as Rs-1 District
	Rs-3 Single-Family Residential District	15,000 square feet	750 minimum for one- or two-bedroom units; 900 minimum for three-bedroom units; 1,050 minimum for four or more bedroom units; 600 minimum on main entry level; 100 minimum per bedroom
	Rs-4 Single-Family Residential District	10,000 square feet	Same as Rs-3 District
	Rs-5 Single-Family Residential District	8,000 square feet	Same as Rs-3 District
	Rs-6 Single-Family Residential District	5,000 square feet	Same as Rs-3 District
	Rd-1 Two-Family Residential District	15,000 square feet; 7,500 square feet per unit	900 minimum for one-bedroom unit; 1,000 minimum for two-bedroom unit; 1,100 minimum for three or more bedroom unit; 1,200 first floor minimum; 100 minimum per bedroom
	Rd-2 Two-Family Residential District	12,000 square feet; 6,000 square feet per unit	800 minimum for one-bedroom unit; 900 minimum for two-bedroom unit; 1,000 minimum for three or more bedroom unit; 1,200 first floor minimum; 100 minimum per bedroom
	Rm-1 Multi-Family Residential District	5,445 square feet per unit	400 minimum per dwelling unit and 1,200 minimum per structure for efficiency; 600 per dwelling unit and 1,800 per structure for one-bedroom unit; 800 per unit and 2,400 per structure for two-bedroom unit; 1,000 per unit and 3,000 per structure for three or more bedroom unit
	Rm-2 Multi-Family Residential District	3,960 square feet per unit	400 minimum per dwelling unit and 1,200 minimum per structure for efficiency; 550 per dwelling unit and 1,650 per structure for one-bedroom unit; 700 per unit and 2,100 per structure for two-bedroom unit; 850 per unit and 2,500 per structure for three or more bedroom unit
Rm-3 Multi-Family Residential District	3,111 square feet per unit	400 minimum per dwelling unit and 1,200 minimum per structure for efficiency; 550 per dwelling unit and 1,650 per structure for one-bedroom unit; 700 per unit and 2,100 per structure for two-bedroom unit; 850 per unit and 2,550 per structure for three or more bedroom unit	
City of West Bend	RS-1 Single Family Residential District	15,000 square feet	1,400 minimum for one- and two-bedroom dwellings; 1,600 for three-bedroom dwellings; 1,800 for four or more bedroom dwellings; 1,000 first floor minimum
	RS-2 Single Family Residential District	12,600 square feet	1,200 minimum for one- and two-bedroom dwellings; 1,400 for three-bedroom dwellings; 1,600 for four or more bedroom dwellings; 900 first floor minimum
	RS-3 Single Family Residential District	9,600 square feet	1,100 minimum for one- and two-bedroom dwellings; 1,200 for three-bedroom dwellings; 1,400 for four or more bedroom dwellings; 800 first floor minimum
	RS-4 Single Family Residential District	7,200 square feet	1,000 minimum for one-, two- and three-bedroom dwellings; 1,200 for four or more bedroom dwellings; 800 first floor minimum
	RD-1 Two Family Residential District	11,500 square feet	800 minimum per unit and 1,600 minimum per building for one-bedroom dwelling; 1,000 per unit and 2,000 per building for two-bedroom dwelling; 1,100 per unit and 2,200 per building for three-bedroom dwelling; 1,200 per unit and 2,400 per building for four or more bedroom dwelling; 500 first floor minimum

Table B-6 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
City of West Bend (continued)	RD-2 Two Family Residential District	8,000 square feet	800 minimum per unit and 1,600 minimum per building for one- and two-bedroom dwelling; 900 per unit and 1,800 per building for three-bedroom dwelling; 1,000 per unit and 2,000 per building for four or more bedroom dwelling; 500 first floor minimum
	RM-1 Multi-Family Residential District	Minimum lot area per unit: 4,545 square feet per one-bedroom unit; 5,445 square feet per two-bedroom unit; 6,145 square feet per three or more bedroom unit	650 minimum for one-bedroom dwelling; 850 for two-bedroom dwelling; 1,050 for three-bedroom dwelling
	RM-2 Multi-Family Residential District	Minimum lot area per unit: 3,630 square feet square feet per one-bedroom unit; 4,350 square feet per two-bedroom unit; 5,000 square feet per three or more bedroom unit	Same as RM-1 District
	RM-3 Multi-Family Residential District	Minimum lot area per unit: 3,150 square feet per one-bedroom unit; 3,630 square feet per two-bedroom unit; 4,350 square feet per three or more bedroom unit	Same as RM-1 District
	RM-4 Multi-Family Residential District	Minimum lot area per unit: 2,900 square feet per one- or two-bedroom unit; 3,200 square feet per three or more bedroom unit	Same as RM-1 District
	RM-5 Multi-Family Residential District	2,900 square feet per unit	550 minimum plus 200 per bedroom if more than one bedroom
Village of Germantown	Rs-1 Single-Family Residential District	Five acres	1,200 minimum for one-bedroom dwelling; 1,300 for two-bedroom; 1,500 for three-bedroom; 1,700 for four-bedroom; 1,100 ground perimeter minimum
	Rs-2 Single-Family Residential District	Two acres	Same as Rs-1 District
	Rs-3 Single-Family Residential District	One acre	Same as Rs-1 District
	Rs-4 Single-Family Residential District	20,000 square feet	1,200 minimum for one-bedroom dwelling; 1,300 for two-bedroom; 1,500 for three-bedroom; 1,700 for four-bedroom; 1,000 ground perimeter minimum
	Rs-5 Single-Family Residential District	15,000 square feet	1,200 minimum for one-bedroom dwelling; 1,300 for two-bedroom; 1,400 for three-bedroom; 1,500 for four-bedroom; 1,000 ground perimeter minimum
	Rs-6 Single-Family Residential District	12,500 square feet	1,200 minimum for one- and two-bedroom dwellings; 1,300 for three-bedroom; 1,400 for four-bedroom; 1,000 ground perimeter minimum
	Rs-7 Single-Family Residential District	10,000 square feet	1,200 minimum for one-, two-, and three-bedroom dwelling; 1,400 for four-bedroom; 1,000 ground perimeter minimum
	Rd-2 One- and Two-Family Residential District	15,000 square feet	Single-family: 1,000 minimum per unit for single-story and 1,200 for multi-story; Two-family: 1,200 minimum per unit
	Rm-1 Multiple-Family Residential District	0.5 acres; 7,260 square feet per unit	400 minimum per unit for efficiency, 650 per unit for one-bedroom dwelling; 800 per unit for two-bedroom; 1,000 per unit for three or more bedroom
	Rm-2 Multiple-Family Residential District	0.5 acres; 5,445 square feet per unit	Same as Rm-1 District
	Rm-3 Multiple-Family Residential District	0.8 acres; 4,356 square feet per unit	350 minimum per unit for efficiency, 525 per unit for one-bedroom dwelling; 650 per unit for two-bedroom; 850 per unit for three or more bedroom
EH Elderly Housing District	10 acres	Single- and two-family: 800 minimum for one-bedroom and 1,000 for two-bedroom; Multi-family: 400 minimum for efficiency; 600 for one-bedroom; 800 for two-bedroom	

Table B-6 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Village of Germantown (continued)	MHP Mobile Home Park Residential District	5,000 square feet for single modular or mobile home; 6,000 square feet for double modular or mobile home	- -
Village of Jackson	R-1 Single Family Residential District R-2 Single Family Residential District R-3 Single Family Residential District R-4 Single Family Residential District R-5 Single Family Residential District R-6 Two Family Residential District R-8 Multiple Family Residential District ^a R-9 Mobile Home Park District	16,000 square feet 14,000 square feet 12,000 square feet 10,000 square feet 8,000 square feet 12,000 square feet Larger of 16,000 square feet or 3,000 square feet for each one-bedroom unit and 3,500 for each two-bedroom unit 5,000 square feet for single modular or mobile home; 7,200 square feet for double modular or mobile home	1,100 minimum; 750 first floor minimum Same as R-1 District 1,000 minimum; 600 first floor minimum Same as R-3 District 800 minimum for one-bedroom dwelling; 900 for two-bedroom; 1,000 for three-bedroom 700 minimum for one-bedroom dwelling; 1,000 for two-bedroom Larger of 2,000 or 500 for each one-bedroom unit, 700 for each two-bedroom unit, and 900 for each three or more bedroom unit - -
Village of Kewaskum	RS-1 Single-Family Residential District RS-2 Single-Family Residential District RD-1 Two-Family Residential District RM-1 Multi-Family Residential District	10,000 square feet 7,200 square feet 12,000 square feet 12,000 square feet for two-family; 12,000 square feet for multi-family buildings with 2,000 square feet per unit for multi-family, efficiency and one-bedroom; 3,000 square feet per unit for multi-family, two-bedroom; 3,500 square feet per unit for multi-family, three-bedroom or more	1,200 minimum for one-story and 750 first floor minimum 1,000 minimum for one-story and 600 first floor minimum 1,000 minimum for one-story and 600 first floor minimum 1,800 minimum for two-family and 900 per unit; 450 square feet per unit for multi-family, efficiency; 500 square feet per unit for multi-family, one-bedroom; 650 square feet per unit for multi-family, two-bedroom; 800 square feet per unit for multi-family, three-bedroom or more
Village of Newburg	R-1 Single-Family Residential District R-2 Single-Family Residential District R-3 Single-Family Residential District R-4 Single-Family Residential District RD-1 Single- and Two-Family Residential District RM-1 Multi-Family Residential District R-6 Mobile Home Park and Mobile Home Subdivision District	20,000 square feet 14,000 square feet 10,000 square feet 8,700 square feet Single-family: 10,000 square feet; Two-family: 13,200 square feet 12,000 square feet; minimum lot area per unit (square feet): One-bedroom: 3,600; Two-bedroom: 4,000; Three-bedroom: 4,356 Park: 5,000 square feet; Subdivision: 6,000 square feet	1,500 1,350 1,150 1,100 Single-family: 1,150; Two-family full basement: 900; Two-family no full basement: 1,100 One-bedroom unit: 600; Two-bedroom unit: 800; Three-bedroom unit: 1,000; Add an additional 100 per unit if no full basement Park: 600; Subdivision: 720
Village of Richfield	RS-1 Country Estate District RS-1R Country Estate/Remnant Parcel District RS-1a Single-Family Residential and Rural Preservation District RS-1b Single-Family Cluster/Open Space Residential District RS-2 Single-Family Residential District RS-3 Single-Family Residential District ^b RS-4 Single-Family Residential District RD-1 Two-Family Cluster/Open Space Residential District RD-2 Two-Family Residential District WHD Walkable Hamlet District	10 acres Five acres 65,000 square feet (gross density of three acres) 1.25 acres 65,000 square feet Refer to ordinance Refer to ordinance One acre minimum net area One acre minimum net area 10,890 square feet	1,300 minimum; 1,050 first floor minimum; 100 minimum per bedroom Same as RS-1 District Same as RS-1 District Same as RS-1 District Same as RS-1 District Not applicable Not applicable 1,100 minimum; 900 first floor minimum; 100 minimum per bedroom 1,100 minimum; 900 first floor minimum; 100 minimum per bedroom 1,300 square feet

Table B-6 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Village of Slinger	R-1 Single-Family Residential District	40,000 square feet	1,500 minimum for one-story dwellings; 1,800 total minimum and 1,000 first floor minimum for two-story dwellings
	R-2 Single-Family Residential District	20,000 square feet	Same as R-2 District
	R-3 Single-Family Residential District	14,000 square feet	1,200 minimum for one-story dwellings; 1,800 total minimum and 1,000 first floor minimum for two-story dwellings
	R-4 Single-Family Residential District	12,000 square feet	1,100 minimum for one-story dwellings; 1,400 total minimum and 800 first floor minimum for two-story dwellings
	R-5 Single-Family Residential District	9,600 square feet	1,000 minimum for one-story dwellings; 1,200 total minimum and 700 first floor minimum for two-story dwellings
	R-6 Single-Family Residential District	7,200 square feet	950 minimum for one-story dwellings; 1,200 total minimum and 700 first floor minimum for two-story dwellings
	Rd-1 Two-Family Residential District	14,000 square feet	950 minimum per dwelling unit
	Rm-1 Multiple Family Residential District	18,000 square feet; up to four units per building ^a	600 minimum for efficiency and one-bedroom units plus 200 for each bedroom additional to one
	Rm-2 Multiple Family Residential District	18,000 square feet; up to four units per building ^a	750 minimum for efficiency and one-bedroom units plus 200 for each bedroom additional to one
	Mh-1 Mobile Home Park Residence District	7,200 square feet	- -
Town of Addison	R-1 Rural Residential District	Five acres	1,200 minimum for one-story dwellings; 1,800 for multi-story dwellings; 800 first floor minimum for multi-story dwellings
	R-2 Single-Family Residential District (Unsewered)	40,000 square feet	1,200 minimum for one-story dwellings; 1,800 for multi-story dwellings; 1,000 first floor minimum for multi-story dwellings
	R-3 Single-Family Residential District (Sewered)	12,000 square feet	1,200 minimum for one-story dwellings; 1,800 for multi-story dwellings; 800 first floor minimum for multi-story dwellings
	R-4 Two-Family Residential District (Sewered)	15,000 square feet; 7,500 square feet per unit	1,000 minimum; 1,000 first floor minimum
	R-5 Multi-Family Residential District ^a	15,000 square feet; 4,000 square feet per unit	2,000 minimum; 650 minimum for efficiency or one-bedroom units; 900 minimum for two-bedroom or larger unit
Town of Barton	R-1 Rural Countryside Single-Family Residential District	10 acres	2,000 minimum plus 200 per each bedroom additional to three for one-story; 2,400 minimum and 1,200 minimum first floor for multi-story plus 160 per each bedroom additional to three; Add 200 to minimum first floor area and total area for dwellings with basements under 600
	R-2 Countryside Single-Family Residential District	5 acres	1,600 minimum plus 200 per each bedroom additional to three for one-story; 1,920 minimum and 960 minimum first floor for multi-story plus 120 per each bedroom additional to three; Add 200 to minimum first floor area and total area for dwellings with basements under 600
	R-3 Estate Single-Family Residential District	3 acres	1,445 minimum plus 210 per each bedroom additional to three for one-story; 1,700 minimum and 935 minimum first floor for multi-story plus 125 per each bedroom additional to three; Add 210 to minimum first floor area and total area for dwellings with basements under 600
	R-4 Suburban Estate Single-Family Residential District	40,000 square feet	1,400 minimum plus 200 per each bedroom additional to three for one-story; 1,600 minimum and 800 minimum first floor for multi-story plus 150 per each bedroom additional to three; Add 250 to minimum first floor area and total area for dwellings with basements under 600
	R-5 Suburban Single-Family Residential District	30,000 square feet	1,400 minimum plus 200 per each bedroom additional to three for one-story; 1,600 minimum and 800 minimum first floor for multi-story plus 150 per each bedroom additional to three; Add 250 to minimum first floor area and total area for dwellings with basements under 600

Table B-6 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Town of Barton (continued)	R-6 Transitional Urban to Suburban/ Rural Residential District	15,000 square feet	1,400 minimum plus 200 per each bedroom additional to three for one-story; 1,500 minimum and 900 minimum first floor for multi-story plus 200 per each bedroom additional to three; Add 200 to minimum first floor area and total area for dwellings with basements under 600
	R-7 Urban Single-Family Residential District ^d	15,000 square feet	Same as R-6
	R-8 Hamlet and Waterfront Residential Neighborhood Conservation District	6,000 square feet	1,000 minimum plus 150 per each bedroom additional to three for one-story; 1,400 minimum and 725 minimum first floor for multi-story plus 150 per each bedroom additional to three; Add 150 to minimum first floor area and total area for dwellings with basements under 600
	R-9 Medium Density Urban Residential District ^e	3,630 square feet	1,000 minimum plus 150 per each bedroom additional to three for one-story; 1,400 minimum for multi-story plus 150 per each bedroom additional to three; Add 150 to total area for dwellings with basements under 600
	R-10 High Density Urban Residential District	2,900 square feet	900 minimum plus 200 per each bedroom additional to one for structures with three to four dwelling units; 850 minimum plus 200 per each bedroom additional to one for structures with five to eight dwelling units; 800 minimum plus 200 per each bedroom additional to one for structures with nine to twelve dwelling units; 750 minimum plus 200 per each bedroom additional to one for structures with 13 or more dwelling units
Town of Erin	R-1 Single-Family Residence District	1.5 acres	1,200 minimum for one-story; 1,400 minimum for one and one-half, 950 first floor; 1,400 minimum for two-story, 800 first floor; 1,200 minimum for bi-level, 800 first floor; and 1,200 minimum for tri-level, 800 first floor with full basement. 1,400 minimum for one-story; 1,400 minimum for one and one-half, 1,150 first floor; 1,400 minimum for two-story, 1,000 first floor with slab at grade
	R-3 Single-Family Residence District	Three acres	Same as R-1
	R-5 Single-Family Residence District	Five acres	Same as R-1
	R-10 Single-Family Residence District R-20 Single-Family Residence District	10 acres 20 acres	Same as R-1 Same as R-1
Town of Farmington	RD Residential District	40,000 square feet for parcels created prior to ordinance adoption; 1.5 acres after adoption	1,200 minimum for one-story; 1,400 minimum for two-story, 800 first floor
	CE Country Estate Residential District	Three acres	1,200 minimum for one-story; 1,400 minimum for two-story, 800 first floor; 1,400 minimum for bi-level; 1,400 minimum for tri-level with 1,200 minimum living area on two levels and balance on third level
Town of Germantown	A Residence District	Three acres	1,400 minimum for single story; 1,800 minimum with 900 first floor minimum for two story and split level dwellings; 100 minimum per bedroom
	B Residence District	Three acres	Same as A Residence District
Town of Hartford	RR Rural Residential District	40,000 square feet	1,000 minimum for one story dwellings; 1,200 for multi-story dwellings
	R Residential District	40,000 square feet for unsewered; 12,000 square feet for sewerred	Same as RR District
Town of Jackson	R-1 Single-Family Residential District	60,000 square feet	1,200 minimum for one-story dwellings; 1,800 total minimum and 1,000 first floor minimum for two-story dwellings
	R-2 Two-Family Residential District	60,000 square feet	1,200 minimum per unit; 1,200 first floor minimum
	R-3 Multi-Family Residential District	60,000 square feet	2,000 minimum per structure; 900 minimum per dwelling unit

Table B-6 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Town of Kewaskum	R-1 Single-Family Residential District	One acre	1,200
Town of Polk	R-1 Single-Family Residential District	60,000 square feet	1,200 minimum for one-story with full basement, 1,400 minimum for one-story without basement; 1,400 minimum for 1.5-story, 950 first floor; 1,400 minimum for two-story, 800 first floor; 1,200 minimum for bi-level and tri-level with at least 400 basement area
Town of Trenton	R-1 Single-Family Residential District (Unsewered)	40,000 square feet	1,400 minimum; 1,000 first floor minimum for multi-story dwellings
	R-2 Single-Family Residential District (Unsewered)	40,000 square feet	1,400 minimum; 1,000 first floor minimum for multi-story dwellings
	R-3 Rural Residential District	Three acres	1,400 minimum; 1,000 first floor minimum for multi-story dwellings
	R-4 Single-Family Residential District (Sewered)	20,000 square feet	1,100 minimum; 700 first floor minimum for multi-story dwellings
	R-5 Single-Family Residential District (Sewered)	12,000 square feet	1,000 minimum; 700 first floor minimum for multi-story dwellings
	R-6 Two-Family Residential District (Unsewered)	60,000 square feet	1,100 minimum per dwelling unit or 2,200 minimum per structure
	R-7 Two-Family Residential District (Sewered)	20,000 square feet	1,000 minimum per dwelling unit or 2,000 minimum per structure
	R-8 Multiple-Family Residential District	1.5 acres for four-unit dwellings plus 0.5 acre per each additional two units ^f	1,000 minimum for three-bedroom apartments; 800 minimum for two-bedroom apartments; 600 minimum for one-bedroom apartments
	CES Country Estate District	10 acres	1,800 minimum; 1,200 first floor minimum for multi-story dwellings
Town of Wayne	CES-5 Country Estate District (Hobby Farms – Country Homes)	Five acres	1,600 minimum; 1,200 first floor minimum for multi-story dwellings
	CES-10 Country Estate District (Hobby Farms – Country Estates)	10 acres	1,800 minimum; 1,400 first floor minimum for multi-story dwellings
Town of Wayne	R-1 Single-Family Residential District	10 acres for traditional and lot averaging; 1.5 acres for clustering with a maximum density of one home per 10 acres	1,200 minimum for one-story; 1,600 minimum for multi-story and 1,000 first floor minimum
	R-2 Single-Family and Two-Family Residential District	Two acres total; 40,000 square feet per dwelling unit	1,200 minimum for one-story; 1,200 first floor minimum
	R-3 Multi-Family Residential District	60,000 square feet total; 20,000 square feet per dwelling unit	2,000 minimum; 900 minimum per dwelling unit
	R-4 Hamlet Residential District	Two acres for traditional and lot averaging; 40,000 square feet for clustering with a maximum density of one home per two acres	1,200 minimum for one-story; 1,600 minimum for multi-story and 1,000 first floor minimum
Town of West Bend	R-1N Neighborhood Residential District	One acre	1,500
	R-1R Rural Residential District	2.5 acres	1,500
	R-1S Shoreland Residential District	65,340 square feet (1.5) acres	1,200 minimum; 950 first floor minimum

NOTES: This table provides a summary of residential zoning districts in Washington County. It lists residential zoning districts which allow various types of residential development as a principal use in each community. This table does not reflect conditional uses or special zoning provisions for senior housing, manufactured housing or mobile homes, housing conversions, or planned unit developments. Agricultural, conservancy and business districts which permit residences in addition to the primary agricultural and business uses are not included on this table. See Table 53 for information regarding PUD regulations.

This table is a summary and should not be used as a guide to answer zoning-related questions. Refer to municipal zoning ordinances and maps for specific zoning information.

On this table, "-" means that no regulation is specified in the zoning ordinance.

^aMulti-family dwellings permitted only as a conditional use in the Village of Jackson and Town of Addison. The Village of Slinger requires a conditional use permit for multi-family buildings with five or more units.

^bThe RS-3 district in the Village of Richfield accommodates only pre-existing uses on parcels that are less than 65,000 square feet in area.

^cThe R-6 district regulations include four separate "Open Space Subdivision" options with varying floor area and lot dimension requirements. Refer to the Town of Barton Zoning Ordinance for more information.

^dThe R-7 district regulations include three separate "Conventional Subdivision" options with varying floor area and lot dimension requirements. Refer to the Town of Barton Zoning Ordinance for more information.

^eThe R-9 district regulations include two development options with varying floor area and lot dimension requirements. The requirements shown are for the permitted use "Conventional Subdivision." Refer to the Town of Barton Zoning Ordinance for more information.

^fA maximum of eight units per lot is permitted in the R-8 district in the Town of Trenton.

Source: SEWRPC.

Table B-7

WAUKESHA COUNTY

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Waukesha County ^a	A-2 Rural Home District	Three acres	900 first floor, 1,500 total; add 200 to total for any structure without a basement of at least 300
	A-3 Suburban Estate District	Two acres	900 first floor, 1,500 total; add 200 to total for any structure without a basement of at least 300
	RRD-5 Rural Residential Density District 5	One acre	Single-family: 900 first floor, 1,500 total; add 200 to total for any structure without a basement of at least 300; Two-family: 750 first floor, 1,400 total per unit; add 200 to total for any structure without a basement of at least 300
	R-1 Residential District	One acre	900 first floor, 1,300 total; add 200 to total for any structure without a basement of at least 300
	R-1a Residential District	One acre	900 first floor, 1,500 total; add 200 to total for any structure without a basement of at least 300
	R-2 Residential District	30,000 square feet	900 first floor, 1,200 total; add 200 to total for any structure without a basement of at least 300
	R-3 Residential District	20,000 square feet	Single-family dwellings: 850 first floor, 1,100 total; add 200 to total for any structure without a basement of at least 300 Multi-family dwellings: 900 for one-bedroom units; 1,000 for two-bedroom units; and 1,100 for three-bedroom units
	City of Brookfield	R-1 Single-Family Residence District	30,000 square feet
R-2 Single-Family Residence District		25,000 square feet	One-, two-, and three-bedroom: 1,600; Four-bedroom or greater: 1,800
R-3 Single-Family Residence District		22,500 square feet ^b	One-, two-, and three-bedroom: 1,400; Four-bedroom or greater: 1,600
R-4 Two-Family Residence District		30,000 square feet	One-, two-, and three-bedroom: 1,400; Four-bedroom or greater: 1,600
M-1 Multiple-Family Residence District		20,000 square feet; maximum density of 2.9 units per net acre	One-, two-, and three-bedroom: 1,400; Four-bedroom or greater: 1,600
M-2 Multiple-Family Residence District		20,000 square feet; maximum density of 5.8 units per net acre	One-bedroom: 800; Two-bedroom: 1,000; Three-bedroom: 1,300; Four-bedroom or greater: 1,500
City of Delafield	RE-3 Three-Acre Rural Estate District	Three acres	900 for first floor, 1,500 total
	RE-2 Two-Acre Rural Estate District	Two acres	900 for first floor, 1,500 total
	RE-1 One-Acre Rural Estate District	One acre	900 for first floor, 1,200 total
	RL-1 Residential Lake District	40,000 square feet	One-story: 1,500; Two-story: 1,200 for first floor, 1,800 total
	RL-1A Residential Lake District	20,000 square feet	One-story: 1,200; Two-story: 1,000 for first floor, 1,500 total
	RL-2 Residential Lake District	10,000 square feet	900 for first floor, 1,100 total
	R-1 Single-Family Residence District	30,000 square feet	850 for first floor, 1,200 total
	R-1D Single-Family Residence – Downtown District	10,000 square feet	850 for first floor, 1,200 total
	R-2 Single- and Two-Family Residential District	30,000 square feet	850 for first floor, 1,200 total
	R-3 Single- and Two-Family Residential District	20,000 square feet	850 for first floor, 1,100 total per unit
	R-4 Single and Two-Family Residential District	7,900 square feet	Single-family: 850 for first floor, 1,000 total; Two-family: 850 for first floor, 900 total per unit
	R-5a PUD St. John's Single and Two-Family Residential District	--	Single-family: 1,500 for one-story; 1,200 first floor, 1,800 total for two-story; Two-family: 1,400 per unit for one-story; 750 first floor, 1,400 total per unit for two-story
	R-6 Multiple-Family Residential District	Minimum lot area per unit (square feet) Efficiency: 2,500; One-bedroom: 3,000; Two-bedroom: 3,500; Three-bedroom: 4,000	Efficiency: 450 per unit; One-bedroom: 800 per unit; Two-bedroom: 1,000 per unit; Three-bedroom: 1,200 per unit

Table B-7 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
City of Delafield (continued)	R-7 Multiple-Family Elderly Housing District ^c	Minimum lot area per unit (square feet) Efficiency: 1,200; One-bedroom: 1,250; Two or more bedroom: 1,500 plus 250 per bedroom additional to two	Efficiency: 450 per unit; One-bedroom: 550 per unit; Two or more bedroom: 850 per unit plus 200 per bedroom additional to two
City of Muskego	RCE Country Estate District RC-1 Country Residence District RC-2 Country Residence District RC-3 Country Residence District RSE Suburban Estate District RS-1 Suburban Residence District RS-2 Suburban Residence District RS-3 Suburban Residence District ERS-1 Existing Suburban Residence District ERS-2 Existing Suburban Residence District ERS-3 Existing Suburban Residence District RL-1 Existing Lakeshore Residence District RL-2 Existing Lakeshore Residence District RL-3 Existing Lakeshore Residence District RM-1 Multiple-Family Residence District RM-2 Multiple-Family Residence District RM-3 Multiple-Family Residence District ERM-1 Existing Multiple-Family Residence District	120,000 square feet 80,000 square feet 60,000 square feet 40,000 square feet 40,000 square feet 30,000 square feet 20,000 square feet 15,000 square feet 22,500 square feet 15,000 square feet 11,250 square feet 26,666 square feet 13,333 square feet 10,000 square feet 5,000 square feet per unit 10,000 square feet per unit 10,000 square feet per unit 40,000 square feet; ^d 20,000 per unit	1,800 first floor; 1,800 total 1,600 first floor; 1,600 total 1,400 first floor; 1,400 total 1,200 first floor; 1,200 total 1,800 first floor; 1,800 total 1,600 first floor; 1,600 total 1,400 first floor; 1,400 total 1,200 first floor; 1,200 total 1,200 first floor; 1,200 total 1,200 first floor; 1,200 total 1,200 first floor; 1,200 total 1,800 first floor; 1,800 total 1,400 first floor; 1,400 total 1,200 first floor; 1,200 total -- Single-family: 1,000 Multi-family: None Single-family: 1,000 Multi-family: None Single-family: 1,400 first floor; 1,400 total; Multi-family: 1,000 per unit
City of New Berlin ^e	R-1/R-2 Rural Conservation Single-Family Residential District R-2E Conservation Estate Single-Family Residential District R-3 Suburban Single-Family Residential District R-4 Low-Density Single-Family Residential District R-4.5 Medium-Density Single-Family Residential District R-5 Medium-Density Single-Family Residential District Rd-1 Two-Family Residential District	Five acres Two acres 20,000 square feet 20,000 square feet 15,000 square feet 10,000 square feet ^f 18,000 square feet	Two-bedroom: 1,300 (one-story), 1,700 (multi-story); Three-bedroom: 1,500 (one-story), 1,700 (multi-story); Four-bedroom: 1,700; Add 200 per bedroom additional to four; Add 200 to total area for dwellings with basements under 600 Same as R-1/R-2 Two-bedroom: 1,200 (one-story), 1,600 (multi-story); Three-bedroom: 1,350 (one-story), 1,600 (multi-story); Four-bedroom: 1,450 (one-story), 1,600 (multi-story) Add 150 per bedroom additional to four; Add 200 to total area for dwellings with basements under 600 Same as R-3 Same as R-3 Two-bedroom: 1,100 per unit Three-bedroom: 1,150 per unit Four-bedroom: 1,400 (one-story), 1,500 (multi-story) Add 150 per bedroom additional to four; Add 200 to total area for dwellings with basements under 600 Two-bedroom: 1,100 (one-story), 1,500 (multi-story); Three-bedroom: 1,250 (one-story), 1,500 (multi-story); Four-bedroom: 1,400 (one-story), 1,500 (multi-story) Add 150 per bedroom additional to four; Add 200 to total area for dwellings with basements under 600

Table B-7 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
City of New Berlin ^e (continued)	Rm-1 Multiple-Family Residential District	20,000 square feet; 6,500 per unit	Principal building: 2,000; Efficiency: 500 per unit; One-bedroom: 650 per unit; Two-bedroom: 800 per unit; Three-bedroom: 1,000 per unit; Add 150 per bedroom additional to three; minimum floor area of 2,200 for units with basements under 600
City of Oconomowoc	RR Rural Residential District SR Suburban Residential District TR Traditional Residential District RML Multi Unit (Low) Residential District RMH Multi Unit (High) Residential District IRM Isthmus Residential Multi District IRS Isthmus Residential Single District	One acre 14,520 square feet 7,260 square feet 5,445 square feet per unit 3,630 square feet per unit 4,356 square feet per unit 8,712 square feet per unit	-- -- -- -- -- -- --
City of Pewaukee	Rs-1 Single-Family Residential District Rs-2 Single-Family Residential District Rs-3 Single-Family Residential District Rs-4 Single-Family Residential District Rs-5 Single-Family Residential District Rs-6 Single-Family Residential District Rs-7 Single-Family Residential District Rd-1 Two-Family Residential District Rd-2 Two-Family Residential District Rm-1 Multiple-Family Residential District Rm-2 Multiple-Family Residential District Rm-3 Multiple-Family Residential District	Five acres Two acres One acre 20,000 square feet 15,000 square feet 12,500 square feet 12,500 square feet 22,000 square feet, 11,000 per unit 18,000 square feet; 9,000 per unit 21,780 square feet; 7,260 per unit 14,520 square feet; 4,840 per unit 10,890 square feet; 3,630 per unit	One-bedroom: 1,200 first floor, 1,200 total; Two-bedroom: 1,200 first floor, 1,300 total; Three-bedroom: 1,200 first floor, 1,500 total; Four or more bedroom: 1,200 first floor, 1,700 total Same as Rs-1 Same as Rs-1 Same as Rs-1 Same as Rs-1 One-bedroom: 900 first floor, 1,100 total; Two-bedroom: 900 first floor, 1,200 total; Three-bedroom: 900 first floor, 1,300 total; Four or more bedroom: 900 first floor, 1,400 total Same as Rs-6 One-bedroom or less: 900 first floor, 900 total; Two-bedroom: 900 first floor, 1,100 total; Three or more bedroom: 900 first floor, 1,200 total Same as Rd-1 Efficiency: 1,200 per structure, 400 per unit; One-bedroom: 1,950 per structure, 650 per unit; Two-bedroom: 2,400 per structure, 800 per unit; Three or more bedroom: 3,000 per structure, 1,000 per unit Same as Rm-1 Efficiency: 1,050 per structure, 350 per unit; One-bedroom: 1,575 per structure, 525 per unit; Two-bedroom: 1,950 per structure, 650 per unit; Three-bedroom: 2,250 per structure, 750 per unit; Four or more bedroom: 2,550 per structure, 850 per unit
City of Waukesha	RS-1 Single-Family Residential District RS-2 Single-Family Residential District RS-3 Single-Family Residential District RS-4 Mobile Home Park/Subdivision Residential District	20,000 square feet 12,000 square feet Single-family: 8,000 square feet; Two-family: 9,000 square feet Subdivision: 7,200 square feet; Park: 5,000 per unit (single module), 6,000 per unit (double module)	1,600; 1,000 first floor for two-story and bi- level; 400 per level for tri-level 1,300; 900 first floor for two-story and bi- level; 450 per level for tri-level Single-family: 1,000; 800 first floor for two- story and bi-level; 350 per level for tri- level; Two-family: 900 per unit 720

Table B-7 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
City of Waukesha (continued)	RD-1 Two-Family Residential District	15,000 square feet	1,100 per unit
	RD-2 Two-Family Residential District	Single-family: 8,000 square feet; Two-family: 9,000	Single-family: 1,000; 800 for first floor; Two-family: 900 per unit
	RM-1 Multi-Family Residential District	Single-family: 8,000 square feet; Two-family: 4,500 per unit; Multi-family: 2,500 per unit (efficiency), 3,000 per unit (one-bedroom), 3,500 per unit (two-bedroom), 4,000 per unit (three or more bedroom)	Single-family: 1,000; Two-family: 900 per unit; Multi-family: 300 per unit (efficiency), 500 per unit (one-bedroom), 700 per unit (two-bedroom), add 150 per additional bedroom (three-bedroom or larger)
	RM-2 Multi-Family Residential District RM-3 Multi-Family Residential District	Same as RM-1 Single-family: 8,000 square feet; Two-family: 4,500 per unit; Multi-family: 2,000 per unit (efficiency) 2,500 per unit (one-bedroom), 3,000 per unit (two-bedroom), 3,500 per unit (three or more bedroom)	Same as RM-1 Single-family: 1,000; Two-family: 900 per unit; Multi-family: 300 per unit (efficiency), 450 per unit (one-bedroom), 600 per unit (two-bedroom or larger), add 100 per additional bedroom (three-bedroom or larger)
Village of Big Bend	RCE Residential County Estate District	Three acres	1,800 first floor
	R-1 Residential District	Two acres	1,600 first floor, 1,800 total
	R-2 Residential District	One acre	1,200 first floor, 1,600 total
	R-3 Residential District RM Multiple-Family Residence District	20,000 square feet One acre; maximum density of one unit per 15,000 square feet	1,200 first floor, 1,600 total 400 per unit (efficiency); 600 per unit (one bedroom); 800 per unit (two bedroom) 1,000 per unit (three bedroom)
Village of Butler	R-1 Single-Family Residential District	10,000 square feet	1,200
	R-2 Two-Family Residential District	Single-family: 4,800 square feet; Two-family: 7,200	800 first floor, 1,000 total per unit
	R-3 Multiple-Family Residential District	15,000 square feet; 3,000 per unit	800 per structure, 500 per unit
Village of Chenequa	Residence District	Lot not abutting Lake: Five acres; Lot abutting Lake: 4.5 acres (150-159 feet of lake frontage); 4.0 acres (160-169 feet of lake frontage); 3.5 acres (170-179 feet of lake frontage); 3.0 acres (180-189 feet of lake frontage); 2.5 acres (190-199 feet of lake frontage); 2.0 acres (200 or more feet of lake frontage)	One-story: 2,000; Multi-story: 1,500 first floor, 2,500 total
Village of Dousman	RR Rural Residence District	20,000 square feet	One-story: 1,200 first floor, add 100 for dwellings without a full basement; 1.5 or Two-story: 900 first floor, 1,250 total; add 100 to total area for dwellings without a basement
	SR-1 Single-Family Residence District	12,000 square feet	One-story: 1,500 first floor, add 100 for dwellings without a full basement; 1.5 or Two-story: 900 first floor, 1,500 total; add 100 to total area for dwellings without a basement
	SR-2 Single-Family Residence District	15,000 square feet	One-story: 1,650 first floor, add 100 for dwellings without a full basement; 1.5 or Two-story: 1,000 first floor, 1,650 total; add 100 to total area for dwellings without a basement
	SR-3 Single-Family Residence District	30,000 square feet	One-story: 1,800 first floor, add 100 for dwellings without a full basement; 1.5 or Two-story: 1,100 first floor, 1,800 total; add 100 to total area for dwellings without a basement
	General Residence District	Single-family: 15,000 square feet; Two-family: 20,000 square feet; Multi-family: 20,000 square feet ⁹	Single-family: 1,000 first floor, 1,500 total; add 100 to total area for dwellings without a full basement; Two-family: 1,500 per unit; add 100 to total area for dwellings without a full basement Multi-family: 1,000 for efficiency units; 1,200 for one-bedroom units; 1,500 for two-bedroom units; 1,800 for three-bedroom units; and 2,100 for units with four or more bedrooms

Table B-7 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Village of Eagle	RS-1 Single-Family Residential District	20,000 square feet	950 first floor, 1,750 total
	RS-2 Single-Family Residential District	20,000 square feet	700 first floor, 1,400 total
	RS-3 Single-Family Residential District	20,000 square feet	600 first floor, 1,200 total
	RD-1 Two-Family Residential District	24,000 square feet; 12,000 per unit	900 first floor, 1,800 total
	RM-1 Multiple-Family Residential District	36,000 square feet; minimum lot area of 5,000 square feet per one-bedroom unit, 7,000 square feet per two-bedroom unit; 9,000 square feet per three-bedroom unit	1,000 first floor per structure; Efficiency: 400 per unit; One-bedroom: 600 per unit; Two-bedroom: 850 per unit; Three-bedroom: 1,100 per unit
Village of Elm Grove	Rs-1 Single-Family Residential District	25,000 square feet	One-story: 1,600; Split-level: 1,600 on upper two levels; 1.5-story: 1,400 first floor, 1,950 total; Two-story: 2,100
	Rs-2 Single-Family Residential District	20,000 square feet	Same as Rs-1
	Rs-3 Single-Family Residential District	20,000 square feet	One-story: 1,400; Split-level: 1,400 on upper two levels; 1.5-story: 1,225 first floor, 1,695 total; Two-story: 1,900
	Rs-4 Single-Family Residential District	15,000 square feet	One-story: 1,100; Split-level: 1,100 on upper two levels; 1.5-story: 975 first floor, 1,325 total; Two-story: 1,500
	Rm-1 Multiple-Family Residential District	20,000 square feet; 7,500 per unit	Two-family: 2,200; Multiple-family: 3,500 per structure, 1,000 per unit
Village of Hartland	RSE-1 Single-Family Residential Estate District	One acre	One-story: 1,800; Split-level: 2,000; Two-story: 2,200
	RS-1 Single-Family Residential District	22,000 square feet	One-story: 1,600; Split-level: 1,800; Two-story: 2,000
	RS-2 Single-Family Residential District	15,000 square feet	Same as RS-1
	RS-3 Single-Family Residential District	12,000 square feet	Same as RS-1
	RS-4 Single-Family Residential District	10,000 square feet	1,200
	RS-5 Single-Family Residential District	8,000 square feet	1,200
	RD-1 Two-Family Residential District	15,000 square feet	1,000 per unit
	RD-2 Two-Family Residential District	10,000 square feet	1,000 per unit
	RM-1 Multiple-Family Residential District	Minimum lot area per unit (square feet): Efficiency: 4,000 ; One-bedroom: 5,000; Two-bedroom or larger: 6,000	2,300 per structure; Efficiency: 600 per unit; One-bedroom: 750 per unit; Two-bedroom or larger: 1,000 per unit
	RM-2 Multiple-Family Residential District	Minimum lot area per unit (square feet): Efficiency and one-bedroom: 2,500 square feet; Two-bedroom or larger: 3,000 square feet	2,000 per structure; Efficiency: 500 per unit; One-bedroom: 650 per unit; Two-bedroom: 900 per unit; Three-bedroom: 1,000 per unit
RM-3 Condominium Multiple-Family Residential District	Minimum lot area per unit (square feet): Efficiency and one-bedroom: 2,500 square feet; Two-bedroom or larger: 3,000 square feet	Same as RM-2	
Village of Lac La Belle	R-I Residence District I	20,000 square feet	1,000 first floor, 1,200 total
	R-I-A Residence District I-A	30,000 square feet	Same as R-I
	R-II Residence District II	20,000 square feet	Same as R-I
	R-III Residence District III	20,000 square feet	Same as R-I
	R-IV Residence District IV	20,000 square feet	Same as R-1
	R-V Residence District V	20,000 square feet	Same as R-1
	R-VI Residence District VI	30,000 square feet	Same as R-1
	R-VII Residence District VII	Five acres	Same as R-1
	R-VIII Residence District VIII	30,000 square feet	Same as R-1

Table B-7 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Village of Lannon	ROP Single-Family Residence Original Plat District	10,000 square feet	900 first floor, 1,200 total
	R-1 Single-Family Residence District	30,000 square feet	900 first floor, 1,500 total
	R-2 Single-Family Residence District	20,000 square feet	900 first floor, 1,400 total
	R-3 Single-Family Residence District	15,000 square feet	900 first floor, 1,400 total
	R-4 Mobile Home/Manufactured Housing District	10,890 square feet	1,000 per unit
	RD Two-Family Residence District	17,500 square feet; 8,750 for each zero lot line duplex parcel	900 first floor, 1,100 total per unit
	RM Multiple-Family Residence District	40,000 square feet; maximum density of 9.0 units per acre	One and two-bedroom: 800 per unit; Three-bedroom: 920 per unit
Village of Menomonee Falls	R-1 Single-Family Residential District	One acre	1,200 first floor, 1,800 total
	R-2 Single-Family Residential District	30,000 square feet	1,200 first floor, 1,600 total
	R-3 Single-Family Residential District	20,000 square feet	1,100 first floor, 1,400 total
	R-3.5 Single-Family Residential District	15,000 square feet	1,100 first floor, 1,400 total
	R-4 Single-Family Residential District	15,000 square feet	1,000 first floor, 1,200 total
	R-5 Single-Family Residential District	9,000 square feet	900 first floor, 1,100 total
	R-6 Single-Family and Two-Family Residential District	Single-Family: 7,200 square feet; Two-family: 9,600 square feet	Single-Family: 750 first floor, 900 total; Two-Family: 900 per unit total; 550 first floor is side by side, 900 on first and on second floor, if upper and lower flats
	RM-1 Multi-Family Residential District	18,000 square feet, minimum lot area per unit (square feet): Efficiency: 2,700; One-bedroom: 2,950; One and one-half bedroom: 3,500; Two-bedroom: 4,200 per unit; Two and one-half bedroom: 4,800 per unit; Three bedroom: 5,400 per unit; Two-bedroom attached or semidetached single-family unit: 4,300; Three-bedroom attached or semidetached single-family unit: 5,500	Efficiency apartment: 400 per unit; One-bedroom apartment: 500 per unit; One and one-half bedroom apartment: 750 per unit; Two-bedroom apartment: 900 per unit; Two and one-half bedroom apartment: 1,000 per unit; Three bedroom apartment: 1,100 per unit; Two-bedroom attached or semidetached single-family unit: 1,000; Three-bedroom attached or semidetached single-family unit: 1,200
	RM-2 Multi-Family Residential District	12,000 square feet minimum lot area per unit (square feet): Efficiency: 2,375; One-bedroom: 2,625; One and one-half bedroom: 3,075; Two-bedroom: 3,550; Two and one-half bedroom: 4,125; Three bedroom: 4,700; Two-bedroom attached or semidetached single-family unit: 3,700; Three-bedroom attached or semidetached single-family unit: 4,900	Same as RM-1
	Village of Merton	R-1 Residential District	40,000 square feet
R-2 Residential District		30,000 square feet	1,000 first floor, 1,300 total
R-3 Residential District		20,000 square feet	1,000 first floor, 1,300 total
R-4 Multi-Family Residential District		15,000 square feet	1,000 first floor, 2,000 total per structure; 800 per unit, add 250 per bedroom additional to one
Village of Mukwonago	R-1 Single-Family Community Residential District	15,000 square feet	1,800; 1,200 first floor for two-story and bi-level; 600 per floor for tri-level
	R-2 Single-Family Village Residential District	8,712 square feet (existing lots as of effective date of ordinance); 12,000 square feet (lots created subsequent to effective date of ordinance)	1,200; 800 first floor for two-story and bi-level; 400 per floor for tri-level
	R-3 Single-Family/Transitional Residential District	Single-family: 15,000 square feet; Two-family: 18,000 square feet; Multi-family: 35,000 square feet, maximum density of 4.6 units per net acre	Single-family: 1,200; 800 first floor for two-story and bi-level; 400 per floor for tri-level; Two-family: 1,000 square feet per unit; Multi-family: 750 per unit (one-bedroom); 950 per unit (two-bedroom); add 150 per bedroom additional to two

Table B-7 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Village of Mukwonago (continued)	R-5 Planned Mobile Home District	12,000 square feet	1,200
	R-7 Single-Family Intermediate Residential District	25,000 square feet	2,000; 1,200 first floor for two-story and bi-level; 750 per floor for tri-level
	R-8 Single-Family Estate Residential District	37,500 square feet	2,500; 1,300 first floor for two-story and bi-level; 900 per floor for tri-level
	R-9 Single-Family Rural Residential District	8,712 square feet (existing lots as of effective date of ordinance); 37,000 square feet (lots created subsequent to effective date of ordinance)	1,200; 800 first floor for two-story and bi-level; 400 per floor for tri-level
	R-10 Multiple-Family District	One acre maximum density of 8.0 units per net acre	One-bedroom: 750; Two-bedroom: 950; Add 150 per bedroom additional to two
Village of Nashotah	RE-1 Rural Estate District	Two acres	900 first floor, 1,400 total; 475 per floor for tri-level with a minimum 700 for middle level
	R-1 Single-Family Residential District	One acre	800 first floor, 1,400 total; 475 per floor for tri-level
	R-2 Single-Family Residential District	21,780 square feet	700 first floor, 1,200 total; 450 per floor for tri-level
	R-4 Multiple-Family Housing for Older Persons ^h	12,000 square feet; 6,000 per unit	600 per unit; 1,150 first floor per structure
Village of North Prairie	R-1 Single-Family Residential District	40,000 square feet	One-bedroom: 900 first floor, 1,100 total; Two-bedroom: 900 first floor, 1,200 total; Three-bedroom: 900 first floor, 1,300 total; Four or more bedroom: 900 first floor, 1,400 total
	R-2 Central Residential District	7,200 square feet	One-bedroom: 850 first floor, 900 total; Two-bedroom: 850 first floor, 1,000 total; Three-bedroom: 850 first floor, 1,100 total; Four or more bedroom: 850 first floor, 1,200 total
	R-3 Multi-Family Residential District	Varies	Same as R-2
Village of Oconomowoc Lake	R-1 General Agriculture/Rural Residential District	Five acres	3,000
	R-2 Suburban Residential District	Two acres	2,250
	R-3 Low Density Residential District	One acre	1,500
	R-4 Low Density Residential District	30,000 square feet	1,000 first floor, 1,500 total
Village of Pewaukee	R-1 Single-Family Detached Residential District	One acre	1,800
	R-2 Single-Family Detached Residential District	21,780 square feet	1,800
	R-3 Single-Family Detached Residential District	15,000 square feet	1,600
	R-4 Single-Family Detached Residential District	12,000 square feet	1,000 first floor, 1,400 total
	R-5 Single-Family Detached Residential District	10,500 square feet	1,000 first floor, 1,200 total
	R-6 Residential Plex District	One acre, maximum density of 8.0 units per acre	One-bedroom: 750 per unit; Two-bedroom: 950 per unit; Three-bedroom: 1,200 per unit
	RM Multiple-Family Residential District	One acre, maximum density of 12.0 units per acre	Same as R-6
	MH Mobile Home Residential District	Lot size subject to Plan Commission approval, maximum density of 8.0 units per acre	Same as R-6
Village of Summit	R-1 Estate Residential District	Two acres	1,200 first floor, 1,800 total
	R-2 Country Residential District	65,340 square feet (1.5 acres)	1,200 first floor, 1,600 total
	R-3 Town Residential District	35,000 square feet	1,200 first floor, 1,400 total
	R-4 Cottage Residential District	20,000 square feet	1,000 first floor, 1,400 total
	MF-1 Duplex Residential District	35,000 square feet	1,200 first floor, 1,400 total
	MF-2 Multi-Family Residential District	Two acres; maximum density of 6.0 dwelling units per acre	Efficiency: 400 per unit; One-bedroom: 650 per unit; Two-bedroom : 800 per unit; Three-bedroom: 1,000 per unit

Table B-7 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Village of Sussex	CR-1 Conservancy Residential District	40,000 square feet	2,300 total for one-story; 2,600 total for bi-level or two-story, 1,600 minimum first floor
	CR-2 Conservancy Residential District	20,000 square feet	2,300 total for one-story; 2,600 total for bi-level, two-story, or tri-level, 1,600 minimum first floor
	TS-1 Traditional Suburban Single-Family Residential District	30,000 square feet	2,600 total for one-story, bi-level, or two-story; 1,500 first floor for bi-level or two-story; 2,500 total for tri-level
	Rs-1 Single-Family Residential District	25,000 square feet	1,800 total; 1,200 first floor for bi-level or two-story
	Rs-2 Single-Family Residential District	20,000 square feet	1,600 total; 1,200 first floor for bi-level or two-story
	Rs-3 Single-Family Residential District	15,000 square feet	1,400 total; 1,000 first floor for bi-level or two-story
	Rs-4 Single-Family Residential District	7,200 square feet	1,200 total; 800 first floor for bi-level or two-story
	Rd-1 Two-Family Residential District	15,000 square feet; 7,500 per unit	1,200 per unit; 600 first floor for bi-level or two-story single-family unit, 1,200 first floor for two-family building
	Rd-2 Two-Family Residential District	10,000 square feet; 5,000 per unit	1,000 per unit; 500 first floor for bi-level or two-story single-family unit, 1,000 first floor for two-family building
	SF-RD-3 Single-Family Attached Residential District	20,000 square feet; 5,000 per unit	One-bedroom: 1,000 per unit; Two-bedroom: 1,200 per unit; Three-bedroom: 1,400 per unit
Rm-1 Multi-Family Residential District	12,000 square feet; minimum lot area per unit (square feet) with underground parking or attached garages: 2,500 for efficiency, 3,000 for one-bedroom, 3,500 for three-bedroom or larger; with surface parking or detached garages: 4,000 for efficiency or one-bedroom, 5,000 for two-bedroom or larger	Efficiency: 350 per unit; One-bedroom: 500 per unit; Two-bedroom or larger: 750 per unit; 1,000 first floor per building	
Village of Wales	R-1 Single-Family Residential District	One acre	900 first floor, 1,300 total
	R-2 Single-Family Residential District	30,000 square feet	900 first floor, 1,200 total
	R-3 Two-Family Residential District	30,000 square feet	Single-family: 850 first floor, 1,000 total; Two-family: 1,400 first floor per building; 700 total per unit
	R-4 Multi-Family Residential District	- j	2,000 first floor per building; Efficiency: 600 per unit; One-bedroom: 800 per unit; Two-bedroom: 1,000 per unit; Three-bedroom: 1,200 per unit
Town of Brookfield	Rs-1 Single-Family Residential District	40,000 square feet	1,300; 1,000 first floor for two-story and bi-level; 450 per floor for tri-level
	Rs-2 Single-Family Residential District	30,000 square feet	1,200; 1,000 first floor for two-story and bi-level; 400 per floor for tri-level
	Rs-3 Single-Family Residential District	20,000 square feet	1,100; 1,000 first floor for two-story and bi-level; 400 per floor for tri-level
	Rs-4 Single-Family Residential District	15,000 square feet	1,100; 1,000 first floor for two-story and bi-level; 400 per floor for tri-level
	Rd-1 Two-Family Residential District	20,000 square feet; 10,000 per unit	1,000 first floor per structure; 1,000 total per unit
	Rm-1 Multi-Family Residential District	20,000 square feet; 10,000 per unit	One-bedroom: 750 per unit; Two-bedroom: 950 per unit; Three-bedroom or larger: 1,100 per unit
	Rm-2 Multi-Family Residential District	20,000 square feet; 6,000 per unit	One-bedroom: 750 per unit; Two-bedroom or larger : 950 per unit
Town of Delafield ^j	R-1 Residential District	1.5 acres	1,500; add 200 for any structure without a basement of at least 300
	R-1(A) Residential District	One acre	1,650; add 200 for any structure without a basement of at least 300

Table B-7 (continued)

Community	Residential Zoning District	Minimum Lot Size	Minimum Floor Area (square feet)
Town of Delafield ¹ (continued)	R-2 Residential District	30,000 square feet	1,350; add 200 for any structure without a basement of at least 300
	R-3 Residential District	20,000 square feet	1,200; add 200 for any structure without a basement of at least 300
	R-L Residential District	20,000 square feet	1,500; add 200 for any structure without a basement of at least 300
	A-2 Rural Home District	Three acres	1,650; add 200 for any structure without a basement of at least 300
	A-3 Suburban Home District	Two acres	1,500; add 200 for any structure without a basement of at least 300
Town of Eagle	A-3 Agricultural/Residential District	Three acres	900 first floor, 1,500 total
	R-1 Residential District	One acre	900 first floor, 1,500 total
	R-L Residential Lake District	20,000 square feet	850 first floor, 1,100 total
Town of Lisbon	RD-5 Rural Density 5-Acre District	Five acres	1,000 first floor, 1,500 total
	A-10 Agricultural District	10 acres	1,000 first floor, 1,800 total
	A-5 Mini-Farm District	Five acres	1,000 first floor, 1,800 total
	A-3 Agricultural/Residential Estate District	Three acres	1,000 first floor, 1,600 total
	R-1 Suburban Single-Family Residential District	One acre	1,000 first floor, 1,500 total
	R-2 Single-Family Residential District	Sewered: 30,000 square feet; Unsewered: One acre	1,000 first floor, 1,400 total
	R-3 Two-Family Residential District	Sewered: 30,000 square feet; Unsewered: One acre	Single-family: 1,000 first floor, 1,400 total; Two-family: 900 total per unit
RM Multi-Family Residential District	One acre; maximum density of 4.0 dwelling units per acre	Single-family: 1,000 first floor, 1,200 total; Two-family: 900 first floor, 1,800 total per unit; Multi-family: 900 total per unit	
Town of Merton	A-2 Rural Home District	Three acres	900 first floor, 1,500 total
	A-3 Suburban Estate District	Two acres	900 first floor, 1,500 total
	R-1 Residential District	One acre	900 first floor, 1,300 total
	R-2 Residential District	30,000 square feet	900 first floor, 1,200 total
	R-3 Residential District	20,000 square feet	900 first floor, 1,100 total
Town of Mukwonago	R-H Rural Home District	Five acres	One-bedroom: 1,100 first floor, 1,400 total; Two-bedroom: 1,100 first floor, 1,400 total; Three-bedroom: 1,100 first floor, 1,600 total; Four or more bedroom: 1,100 first floor, 1,800 total; Add 200 to total area for structures without a basement of at least 300 square feet
	S-E Suburban Estate District	Three acres	Same as R-H
	R-1 Residential District	One acre	Same as R-H
	R-2 Residential District	30,000 square feet	One-bedroom: 900 first floor, 1,000 total; Two-bedroom: 900 first floor, 1,100 total; Three-bedroom: 900 first floor, 1,200 total; Four or more bedroom: 900 first floor, 1,400 total;
	R-3 Residential District	- .k	- .k
Town of Waukesha	R-E Single-Family Residence; Estate District	Three acres	1,200 first floor, 2,500 total; add 300 to total for any structure without a basement of at least 300
	R-SE Suburban Estate District	Two acres	1,100 first floor, 2,300 total; add 300 to total for any structure without a basement of at least 300
	R-1 Single-Family Residence District	One acre	1,000 first floor, 1,800 total; add 300 to total for any structure without a basement of at least 300
	R-2 Single-Family Residence District	30,000 square feet	900 first floor, 1,500 total; add 300 to total for any structure without a basement of at least 300
	R-3 Single-Family Residence District	20,000 square feet	900 first floor, 1,400 total; add 300 to total for any structure without a basement of at least 300

Table B-7 (continued)

NOTES: This table provides a summary of residential zoning districts in Waukesha County. It lists residential zoning districts which allow various types of residential development as a principal use in each community. This table does not reflect conditional uses or special zoning provisions for senior housing, manufactured housing or mobile homes, housing conversions, or planned unit developments. Agricultural, conservancy and business districts which permit residences in addition to the primary agricultural and business uses are not included on this table. See Table 53 for information regarding PUD regulations.

This table is a summary and should not be used as a guide to answer zoning-related questions. Refer to municipal zoning ordinances and maps for specific zoning information.

On this table, "-" means that no regulation is specified in the zoning ordinance.

^aThe Towns of Genesee, Oconomowoc, Ottawa, and Vernon are regulated under the Waukesha County zoning ordinance. Multi-family units may be permitted as conditional uses in the R-3 district. The minimum lot size is dependent on the allowable density and number of units. The minimum lot area is 8,000 square feet per unit if public water and sanitary sewer services are provided, 10,000 square feet per unit if sanitary sewer service (but no public water) is provided; and 15,000 square feet per unit if no public water or sanitary sewer services are provided.

^bMinimum 20,000 square feet lot area for lots created prior to August 15, 1989, or for lots not created by subdivision.

^cMulti-family housing permitted for older persons only in the R-7 zoning district, as defined in the City of Delafield zoning ordinance. The City ordinance also includes a R-6 district that allows non-age restricted multi-family housing.

^dPlan Commission may grant up to a 15 percent variance where existing buildings are on the lot.

^eRefer to the City of New Berlin zoning ordinance for information regarding minimum first floor area.

^fApplies only to existing platted areas in the City of New Berlin.

^gMulti-family dwellings may be permitted in the Village of Dousman as a conditional use in the General Residence zoning district.

^hThe Village of Nashotah zoning ordinance allows multi-family development only for housing to be occupied by persons aged 55 years or older.

ⁱLot sizes for multi-family development in the Village of Wales are determined on a case-by-case basis under planned unit development procedures. The maximum density allowed under the zoning ordinance is 8.0 dwelling units per acre.

^jRefer to the Town of Delafield zoning ordinance for information regarding minimum first floor area.

^kApplies only to existing lots within 500 feet of Spring Lake and Upper and Lower Phantom Lakes.

Source: SEWRPC.

Appendix II
Citizen Participation Record

Participating Stakeholder Organizations

Representatives from the following organizations participated in public meetings, were interviewed, or were otherwise consulted in the course of developing this Analysis of Impediments to Fair Housing Choice.

- City of Brookfield
- City of Menomonee Falls
- City of Mukwonago
- City of New Berlin
- City of Oconomowoc
- City of Watertown
- City of Waukesha
- City of Waukesha Parks and Land Use
- City of West Bend
- Town of Genesee
- Village of Grafton
- Village of Mukwonago
- Village of Slinger
- Jefferson County
- Jefferson County Board of Supervisors
- Ozaukee County Human Services
- Washington County Board of Supervisors
- Washington County Parks and Planning
- Waukesha County Human Services
- Waukesha County Parks and Land Use
- CDBG Board
- HOME Board
- Advocates of Ozaukee
- Aging and Disability Resource Center
- Associated Bank
- Boys and Girls Club
- The Caring Place
- Carroll University
- Casa Guadalupe of West Bend
- Community Action Coalition
- Family Promise of Waukesha
- Habitat for Humanity Waukesha County
- Hebron House
- Hope Center, Inc.
- Interfaith Senior Programs
- Jefferson County Economic Development Consortium
- Jefferson County Literacy Council
- Lake Area Free Clinic
- Literacy Council of Greater Waukesha
- Metro Milwaukee Fair Housing Council
- Movin' Out
- Port Washington State Bank
- Premier Bank
- Safe Babies Healthy Families
- Slinger Housing Authority
- Tarantino Development
- United Way Ozaukee
- United Way Waukesha
- UW Extension – Waukesha
- UW Extension – Jefferson
- Waukesha Community Art Project
- Waukesha County Community Dental Clinic
- Waukesha Housing Authority
- Wisconsin Partnership for Housing Development
- Wisconsin Women's Business Initiative Corporation
- Women's Center

PUBLIC HEARING NOTICE

Waukesha County, along with WFN Consulting, Inc., will begin preparing its HUD-required 2015-2019 Five Year Consolidated Plan, which will describe community needs with an emphasis on low and moderate income and special populations related to housing and community development. Waukesha County is part of a 4-county consortium called the HOME Consortium, which includes Jefferson, Ozaukee and Washington Counties. The Plan will identify proposed funding resources and uses of funds to meet low and moderate-income housing and community development needs. Waukesha County and the HOME Consortium will also begin preparing its Analysis of Impediments to Fair Housing plan, and its 2015 Annual Action Plan at the same time. To learn more, visit www.waukeshacountyconplan.com. Citizens are invited to comment in order to assess fair and affordable housing and local community development needs at the following public hearings:

Public Kickoff Meeting

Monday, August 11, 2014 at 1:30 p.m.
Waukesha County Administration Building
515 W. Moreland Blvd., Room 355/359, Waukesha, WI 53188

Neighborhood Meetings

Monday, August 11, 2014 at 4:00 p.m.
Jefferson County Workforce Development Center
864 Collins Rd., Rooms 8-9, Jefferson, WI 53549

Monday, August 11, 2014 at 6:00 p.m.
Oconomowoc Public Library
200 W. South St., Oconomowoc, WI 53066

Tuesday, August 12, 2014 at 6:00 p.m.
Cedarburg Cultural Center
W62N546 Washington Ave., Cedarburg, WI 53012

Tuesday, August 12, 2014 at 6:00 p.m.
Washington County Health & Human Services Center
333 E. Washington St., Room 3224, West Bend, WI 53095

Wednesday, August 13, 2014 at 6:00 p.m.
Citizens Bank of Mukwonago – Waukesha Office
2109 Corporate Dr., Waukesha, WI 53187

Citizens unable to attend the hearings can comment in writing to the Community Development Staff, c/o Waukesha County Administration Center 515 W. Moreland Blvd. Room AC 320, Waukesha, WI 53188 or email to Kristin Silva at ksilva@waukeshacounty.gov.

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Monday, August 11, 2014 at 6:00 p.m.
Oconomowoc Public Library
200 W. South St., Oconomowoc, WI 53066

Wednesday, August 13, 2014 at 6:00 p.m.
Citizens Bank of Mukwonago – Waukesha Office
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Citizens unable to attend the hearings can comment in writing to the Community Development Staff, c/o Waukesha County Administration Center 515 W. Moreland Blvd. Room AC 320, Waukesha, WI 53188 or email to Kristin Silva at ksilva@waukeshacounty.gov.

Waukesha County and the HOME Consortium

Notice of 2015-2019 Consolidated Plan, 2015 Annual Action Plan and 2015-2019 Analysis of
Impediments to Fair Housing

Under Title 1 of the Housing and Community Development Act of 1974, as amended, Waukesha County and the HOME Consortium invite any interested parties to participate in the preparation of the 2015-2019 Consolidated Plan, 2015 Annual Action Plan and 2015-2019 Analysis of Impediments to Fair Housing.

Waukesha County, along with WFN Consulting, Inc., has prepared its HUD-required 2015-2019 Five Year Consolidated Plan, which describes community needs and funding priorities with an emphasis on low and moderate income and special populations related to housing and community development. Waukesha County is part of a 4-county consortium called the HOME Consortium, which includes Jefferson, Ozaukee and Washington Counties. The Plan identifies funding resources and uses of funds to meet low and moderate-income housing and community development needs. Waukesha County and the HOME Consortium also prepared its Analysis of Impediments to Fair Housing plan, and its 2015 Annual Action Plan. To learn more, visit www.waukeshacountyconplan.com.

Notice is hereby given that Waukesha County's draft 2015-2019 Consolidated Plan, 2015 Annual Action Plan and 2015-2019 Analysis of Impediments to Fair Housing will be available for a 30-day public review period on September 26, 2014. The draft plans are available for review at the Waukesha County Community Development website, www.waukeshacounty.gov/communitydevelopment/, and in person at the Waukesha County Community Development office, Room AC320, 515 W. Moreland Blvd., Waukesha, WI, 53188. The public comment period will close at 4:30 p.m. on October 26, 2014. Citizens are invited to review the plans and comment in writing to the Community Development Staff at the address listed above, or email to Kristin Silva at ksilva@waukeshacounty.gov.

Citizens are also invited to comment on the plans at the public hearing on Monday, October 6, 2014 at 9:00 a.m., at the Waukesha County Administration Center Room 355/359, 515 W. Moreland Blvd., Waukesha, WI 53188.

A Housing & Community Development Plan

For Waukesha, Washington, Ozaukee, and Jefferson Counties



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THE 2015-2019 CONSOLIDATED PLAN AND ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Welcome to the webpage for the 2015-2019 Consolidated Plan and Analysis of Impediments to Fair Housing Choice being developed for Waukesha, Washington, Ozaukee, and Jefferson Counties!

The Consolidated Plan, much like a strategic plan, will identify housing and community development needs anticipated over the next five years. Community needs may include things such as sheltering, meal programs, medical assistance, economic development, and improvements to public facilities. The updated Consolidated Plan will be used to guide program funding decisions over the next five years.

The Analysis of Impediments will identify barriers to equal access to housing and propose strategies to overcome those impediments. It will cover public and private policies, practices, and procedures affecting housing choice and provide essential information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates.

Both studies are required by the U.S. Department of Housing and Urban Development (HUD) as a condition of the receipt of Community Development Block Grant and HOME funds.

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A Housing & Community Development Plan



For Waukesha, Washington, Ozaukee, and Jefferson Counties

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DOCUMENTS & RESOURCES

Drafts of the 2015-2019 Consolidated Plan, the 2015 Action Plan, and the Analysis of Impediments to Fair Housing Choice are available below. You can submit comments on the draft using the [comment form](#) or by email to Kristin Silva, Waukesha County Community Development Manager, ksilva@waukeshacounty.gov. The comment period is open until October 26, 2014.

- [Draft Consolidated Plan & Action Plan](#)
- [Draft Analysis of Impediments to Fair Housing Choice](#)
- [Public Hearing Presentation of Draft Plans](#)

Thanks to everyone who attended the public kickoff and neighborhood meetings. Presentations from those meetings are available below:

- [Kickoff Meeting and Waukesha County Neighborhood Meetings](#)
- [Jefferson, Ozaukee, and Washington County Neighborhood Meetings](#)

The following links are provided to reference material:

National Resources

- [Consolidated Plan Overview](#)
- [Community Development Block Grant \(CDBG\) Program Overview](#)
- [HOME Investment Partnerships Program Overview](#)
- [Office of Fair and Equal Housing](#)
- [Fair Housing Planning Guide](#)
- [Proposed Regulation on Affirmatively Further Fair Housing Choice](#)
- [How to File a Housing Discrimination Complaint](#)

Local Resources

- [Waukesha County Office of Community Development](#)
- [HOME Consortium serving Waukesha, Washington, Ozaukee, and Jefferson Counties](#)



A Housing & Community Development Plan



For Waukesha, Washington, Ozaukee, and Jefferson Counties

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TAKE THE SURVEY

The Housing & Community Development Survey is now closed. If you would like to share your thoughts on housing and community development needs or fair housing issues in Waukesha, Washington, Ozaukee, or Jefferson Counties, please [submit a comment](#).



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A Housing & Community Development Plan



For Waukesha, Washington, Ozaukee, and Jefferson Counties

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- COMMENT

LET US HEAR FROM YOU!

Input and comments from the public are needed and encouraged! Please take a moment to share your thoughts with us. Comments received will be considered in the revision of the Consolidated Plan and Analysis of Impediments drafts and appended to the documents when they are submitted to HUD.

COMMENT FORM

Name: *

Email: *

Subject: *

Message: *

SUBMIT

From: Sheena Villers [<mailto:info@wfnconsulting.net>]
Sent: Monday, September 29, 2014 8:48 AM
Subject: Draft- Consolidated Plan and AI Available for Comment

Dear Community Stakeholder:

WFN Consulting has completed drafts of the 2015-2019 Consolidated Plan, 2015 Action Plan, and 2015-2019 Analysis of Impediments to Fair Housing Choice for Waukesha County and the HOME Consortium. The drafts have now been posted to the project website (<http://www.waukeshacountyconplan.com>) and are available for review. Any comments regarding these can be submitted by October 26, 2014 via the website. Stakeholders are also invited to comment on the plans at a public hearing on Monday, October 6, 2014 at 9:00 a.m., at the Waukesha County Administration Center Room 355/359, 515 W. Moreland Blvd., Waukesha, WI 53188.

For more information, additional locations to access the draft document, or alternative means to provide comments, please consult the attached public notice.

We thank you for your participation in the process thus far and look forward to receiving your feedback on the drafts.

Sheena Villers
Human Resource Manager

WFN Consulting, LLC
123 Church Street, Suite 300
Marietta, GA 30060
o: 770.420.5634
f: 770.420.5635
www.wfnconsulting.com

A simply different perspective on Community Development.

Appendix III
Public Comments Received

METROPOLITAN
MILWAUKEE



600 East Mason Street,
Suite 401

Milwaukee, WI 53202

phone 414.278.1240
fax 414.278.8033
tty 414.278.0280

fairhousingwisconsin.com

William R. Tisdale
President and CEO

October 13, 2014

Kristin Silva, Community Development Coordinator
Waukesha County
515 W. Moreland Blvd., Room AC320
Waukesha, WI 53188



Dear Ms. *Kristin* Silva:

Thank you for the opportunity to provide input on Waukesha County's draft AI. The statement below reflects the verbal comments I presented to the County on October 6, 2014. MMFHC has 3 major recommendations:

- The analysis was much more thorough than the previous AI in many ways. However the consultant neglected to incorporate the City of Milwaukee/Milwaukee County – the region's economic engine - into the analysis. When I spoke with the consultant in a phone interview, the point that I emphasized most strongly was "it is essential that the analysis not exclude Milwaukee." When the draft does acknowledge the level of hyper- segregation that does exist, it is buried farther in the section. We urge you to rewrite the segregation analysis, incorporating Milwaukee and create new maps addressing the Black and Latino populations to include Milwaukee. Recommendations related to the segregation and Black and Latino populations should also be changed to reflect Waukesha in the context of the MSA.
- If municipal subrecipients are to address their impediments to fair housing, they should be aware which impediments apply specifically to them. For instance, is Muskego has a zoning ordinance that does not allow for multifamily housing conducive to affordability, the AI should identify the community as such. Fortunately much of this work has already been done in the SEWRPC Regional Housing Study. We recommend a table listing the various impediments to fair housing and which communities to which those impediments apply.
- Finally, there are no action steps indicating how the county will operationalize the AI recommendations. As I understand, based on your comments October 6, the action plan will come at a later date and will not be the document that the Community Development Board approves. Because the Action Plan is the most essential part of the AI, we recommend the County work in conjunction with the consultant to develop that action plan so the public has an opportunity comment.

Please let me know if you have any questions. I would be happy to discuss this with you at greater depth at a time of your convenience.

Respectfully submitted,

Kori Schneider Peragine

MILWAUKEE HOUSING COALITION

October 24, 2014

Dear Waukesha County/HOME Consortium:

The Milwaukee Housing Coalition is a group of non-profit organizations that follows housing issues in the metropolitan Milwaukee area. We appreciate this opportunity to comment on the 2015-2019 Consolidated Plan and the Analysis of Impediments (AI) to Fair Housing.

Regarding the Consolidated Plan, we applaud the work that has gone into developing the Consolidated Plan. However, there are some areas of concern.

The Consolidated Plan repeatedly identifies a high need for more affordable and accessible rental housing, citing immigrant or foreign-born populations, aging Baby Boomers needing accessibility, and the cost burden of existing housing for low-to-moderate income residents. Yet the recommended allocations do not make rental housing a priority. The counties of the HOME Consortium are among some of the economically fastest-growing counties in the state, with many new jobs in the area. SEWRPC has identified a jobs/housing disparity in much of the populated areas of Ozaukee, Washington, and Waukesha Counties. Yet it is proposed that more money be spent on economic development than on rental housing.

The proposed allocations continue the homeownership emphasis while virtually ignoring the need for affordable, accessible, and integrated rental housing. Even the funding for housing counseling focuses only on homeownership counseling rather than making tenant counseling available to the residents.

The Coalition is also concerned that there is not much mention of keeping aging citizens and other people with disabilities in their homes with the assistance of accessibility modifications. The funding for home rehabilitation can be used to improve home accessibility. But this is not mentioned in the Plan as a priority despite the need identified.

The low utilization rate of the Housing Choice Vouchers ranging from 81% to 85% is also worrisome. Those vouchers are in high demand, and every voucher not utilized is a family not housed. The Public Housing Authorities should be examining the programs to determine why the rates are this low. If the reason is high housing costs and/or difficulty in finding housing, assistance could be offered in helping families locate suitable housing.

The Consolidated Plan stated that Waukesha County adopted the Regional Housing Plan, with "refinements". However, in the view of the Housing Coalition, the County has gutted some of the key recommendations of the Regional Housing Plan.

MILWAUKEE HOUSING COALITION

The Coalition would like to note that it has been nearly 25 years since the Americans with Disabilities Act was passed. In our view, accessibility improvements to public facilities should be incorporated into the normal planning and funding process of the municipalities rather than using CDBG funding.

We also have concerns about the HOME Consortium's proposed Analysis of Impediments (AI) to Fair Housing Choice. As the AI notes, Waukesha is only 15 miles west of the City of Milwaukee and the health and vibrancy of the communities is clearly intertwined. The Milwaukee Housing Coalition and its member organizations are stakeholders in ensuring that the HOME Consortium correctly identifies impediments to fair housing and takes appropriate actions to address those impediments.

First, the Analysis of Impediments is meant to be a comprehensive review of a state or entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices, and it is meant to be an assessment of how those laws, etc. affect the location, availability, and accessibility of housing (HUD Fair Housing Planning Guide, p. 2-7). In order to be a comprehensive and useful review, the AI must identify specific laws, regulations, and administrative policies that affect fair housing. The HOME Consortium is not a governing body, and most of the laws, etc., that affect the availability of affordable housing are in place because of the actions of local, sub-grantee governments. Instead of providing a comprehensive review of each sub-grantee's specific laws, regulations and administrative policies, however, the HOME Consortium's AI provides only general information regarding the four-county study area. Without a more specific, comprehensive review that informs the public about sub-grantees' particular impediments to fair housing, the HOME Consortium's AI is of little practical use, making it difficult to identify problematic sub-grantees and to develop an effective action plan.

Second, the AI fails to include a Segregation Analysis that includes Milwaukee County. Although the AI recognizes that the Milwaukee-Waukesha-West Allis MSA has the 2nd highest dissimilarity index for Black and White residents in the nation, and the 13th highest for Hispanic and White residents (p.4), the AI simply fails to analyze segregation within Milwaukee and the consortium counties. Further, the AI omits any analysis of the specific impediments that people of color and people with disabilities face when they are trying to move from Milwaukee to one of the consortium counties. (p. 4). The AI's omission of a detailed analysis of segregation that includes Milwaukee seems discriminatory and intentional.

Third, and finally, the segregation analysis includes the questionable statement that there are at least three reasons why patterns of segregation exist: personal preferences, income difference, and illegal discrimination in the housing market (p. 50). This statement is troubling because there are several more, systemic, structural causes of segregation, and it is exactly

MILWAUKEE HOUSING COALITION

those systemic, structural causes of segregation that an AI is meant to address. The inclusion of this statement implies that the HOME Consortium simply does not understand the purpose of an AI or the causes of segregation.

The Milwaukee Housing Coalition appreciates that this proposed AI improves on the prior HOME Consortium AI. We hope that the Consortium will consider these comments and act to develop a truly regional, comprehensive review of impediments to fair housing, which we believe will result in a more practical and effective action plan.

Thank you for the opportunity to comment on the Consolidated Plan and the Analysis of Impediments.

Sincerely,

ACLU of Wisconsin

Disability Rights Wisconsin

IndependenceFirst

Legal Aid of Wisconsin

Metropolitan Milwaukee Fair Housing Council

Wisconsin Community Services

Melissa Mailloux

From: Silva, Kristin <KSilva@waukeshacounty.gov>
Sent: Thursday, October 23, 2014 4:33 PM
To: Melissa Mailloux
Subject: FW: Comments on AI
Attachments: Wauk Co AI comments.pdf; Water services in SER.pdf

Comments on the AI from one of the planners who worked on the SEWRPC report.

From: Anderson, Nancy M. [mailto:NANDERSON@SEWRPC.org]
Sent: Thursday, October 23, 2014 3:18 PM
To: Silva, Kristin
Cc: Shaver, Dale
Subject: Comments on AI

Hi Kristin. My comments on the AI are attached.

Page 75: The main point here is that Jefferson, Ozaukee, and Washington Counties all fund shared-ride taxi services; and Ozaukee, Washington, and Waukesha Counties fund commuter bus services. All of these are considered public transit services. The City of Waukesha is the only community in the 4-county area that operates a fixed-route local public transit service, however.

Pages 76 and 77: The lists of communities that operate sewage treatment plants and public water utilities are incomplete. I've listed all of them for the three counties in the SEWRPC region, but you may just want to change the text to say something along the lines of "As shown on Maps A and B, public water and sanitary sewer services are available in most of the cities and villages in the study area." Unfortunately we don't have maps for Jefferson County, but perhaps the County planning department could provide you with PDF's.

Also, stormwater discharge permits have been issued to several communities in the study area, so rather than focusing on Ozaukee County it may be better to either delete the stormwater permit information, or say that permits have been issued to several cities and other communities in the study area.

Page 101: See hand-written note at the bottom of the page. For clarity, I would feel more comfortable if the title of the section is changed to "County AI Recommendations" or "AI Recommendations." Because of all the discussion of the regional housing plan findings, it's not clear in the text if these are recommendations from the AI or the housing plan.

Page 102: DNR does not allow sanitary sewers to be extended/constructed unless the area to be served is located in a planned sewer service area adopted by the community and approved by the DNR. Including a map of the planned sewer service areas would be helpful for this section too.

http://www.sewrpc.org/SEWRPCFiles/LandUse/LandUseData/SanitarySewerServiceAreas/ssa_region.pdf

Please let me know if you have any questions about these comments or would like more information.

Thank you,
Nancy

*Comments from
Nancy Anderson
SEWRPC
10/23/14*

2015-2019 Analysis of Impediments to Fair Housing Choice

Waukesha County, Wisconsin
And the HOME Consortium

Draft
September 24, 2014

Prepared for
Waukesha County, Wisconsin

By



Note: Shared ride taxi services and commuter bus routes are all ~~run~~ run by public agencies & considered public transit.

a robust transit system

In addition, a paratransit service for people with disabilities is provided by the City of Waukesha transit system. Paratransit service is provided to ~~disabled~~ individuals that cannot use fixed route service in accordance with the Federal Americans with Disabilities Act (ADA) of 1990. All transit vehicles that provide conventional fixed-route transit service must be accessible to persons with disabilities, including those persons using wheelchairs. *with disabilities*

Cash only fares range from \$2.00 one-way, \$5.00 day passes, \$1.00 for senior citizen and disabled passengers (Medicare or Metro ID of disability required), and \$1.25 for youth ages 5-18 (valid proof of school enrollment required). Passes for 31 days are available at special Metro Fare Outlets at the following rates, adults (\$46.00), youth (\$30.00), and senior citizens/disabled (\$35.00). Express routes services can be purchased at additional higher rates in the range of \$1.00-\$2.00 each way. The Aging and Disability Resource Center operates two taxi services for senior citizen and disabled residents with fares ranging from \$3.50-\$7.25 one-way. While, rates appear affordable, households may have more than one resident needing to use bus services. For examples, a household of one adult and 2 children would require \$106 for a 31 day pass. The housing affordability section of this analysis indicated that over 30% of residents in each county were cost burdened. These residents are most likely to utilize public transportation, although they are less likely to be able to afford it due their housing costs. *Fixed route local*

Neither Jefferson, Ozaukee, nor Washington Counties are served by public transportation systems. Stakeholder input, which will be discussed in greater detail in the stakeholder input section, indicated that lack of transit is a barrier to employment and accessing amenities and public/social services. Jefferson County has a taxi service available for disabled and elderly residents which offers within city limit rides at a rate \$2.00 one way, in Fort Mills, Jefferson, Lake Mills, and Watertown. Rides to Senior Dining are provided at a rate of \$1.00-\$2.00 each way, this service unavailable in Watertown, depending on the city. Medical Transportation Management provides transportation to medical appointments for a co-pay of \$10.00 out of county and \$2.00 within county. Jefferson County Human Services operates a volunteer driver program for elderly and disabled residents needing transportation to medical appointments whose benefits have not begun. The county department of human services also provides a van to take elderly and disabled residents shopping for \$1.00 per trip. Jefferson County transport veteran's to the VA hospital throughout the week.

Ozaukee County operates a Shared-Ride taxi *service available to all.* which ~~began as a service for only the elderly and disabled.~~ Taxi services are provided throughout the county, which is divided into six zones. Costs vary from \$2.75-6.50 per trip for adults, \$2.25-\$5.25 per trip for students, and \$2.25-\$5.25 per trip for elderly and disabled, depending on the zone. The taxi service does operate wheelchair accessible vans. Weekly out of county transit for veterans is provided. Two local nonprofits provide voluntary driving services for the elderly and disabled and Life Star Emergency Medical Services provides ambulance services within Ozaukee and Milwaukee counties. Ozaukee County Express provides bus service between Ozaukee and Milwaukee Counties with included shuttle service to most employer

not available to all residents

Shared-ride taxi services are available in the cities of Fort Atkinson, Jefferson, Lake Mills, Watertown, and Whitewater in Jefferson County. Reduced rates for the elderly and people with disabilities are available

Milwaukee

from designated park and ride lots. Fare ranges from \$2.25 per way. \$17.50 for a weekly pass, or \$64.00 for a monthly pass.

Washington County also operates a Shared-Ride taxi system which provides service throughout Washington County and into areas of Menomonee Falls. Fares are based on distance and range from \$4.25-\$9.00 one-way for adults, \$3.25-\$ 8.00 one-way for students, and \$2.50-\$5.75 one-way for senior citizen and the disabled. Washington Commuter Express provides service from Washington County to Milwaukee and park and rides that service business parks in West Bend, Germantown, and Richfield. Fares is \$3.25 one-way.

Stakeholder Input

Nearly all stakeholders interviewed during the planning process identified transportation as a crucial area of need. Stakeholders in Waukesha County identified a persistent misconception that people do not utilize local bus transit that may inhibit planning in this area. It was also reported that the cost of public transportation within Waukesha County was high and that several of the residents in need of public transit were unable to afford it. Low availability of public transit near business and industrial parks were identified as barriers to attracting new business and workers. Low availability of bike paths and walkways were also identified as barriers to accessing employment and community services and amenities for residents unable to afford cars or public transit. Jefferson, Washington, and Ozaukee Counties all lack public transportation beyond taxi services, which typically run only within the county, and transportation services designed for the elderly and disabled. It was reported that this is limiting to residents ability to access employment and services in other counties. Social and public services were described as concentrated in Waukesha County, leaving residents unable to afford cars with an inability to access services.

Water & Sewer

The four county study area is served by several water and sewer systems typically run independently by local cities, villages, or municipalities. ~~Waukesha County consists of 10 public sewage treatment plants. Seven plants are located within the County including plants in Oconomowoc, Dousman, Delafield-Hartland, Mukwonago, Fox River, Sussex, and the city of Waukesha. Two plants, Jones Island and South Shore, are operated by the Milwaukee Metropolitan Sewerage district, and The final plant is located in the town of Norway in Racine County.~~ Administration of private sewage systems is governed by Waukesha County with responsibility assigned to the Department of Parks and Land Use - Environmental Health Division. Waukesha County is served by 16 ^{public water utilities} ~~water supply facilities~~ which provide water for approximately 62% of the County's residents. ~~Two systems located in Mukwonago and Prairie Village also provide water services and supply for neighboring towns and villages.~~³³

Muskego, and New Berlin and the Villages of Butler, Elm Grove, and Menomonee Falls.

Serving Waukesha County.

Sewerage District (MMSD) and serve all or portions of the cities of Brookfield,

and (see Maps A and B).

There are

Brookfield (west side),

³³ <http://www.ci.waukesha.wi.us/web/guest/enggssewer>

And serves a small portion of the City of Muskego.

* Future public water supply and sewage treatment facilities and service areas are documented in ^{the} SEWRPC Regional Water Supply Plan and the Regional Water Quality Management Plan, respectively.

The City of Waukesha completed reports on its storm water management system in 2013 and its waste water treatment facilities in 2011. The 2011 waste water treatment report reviewed existing treatment facilities, permit requirements, and space needs. Findings included a need to reduce hydraulic bottlenecks and overflow, a need for replacement of equipment at the plant due to end of life cycle use for several key components, and a need to increase UV disinfection capacity to meet peak hourly flow. The report develops a 20 year plan, with 5 year increments, that will allow the city to make needed upgrades and repairs. In 2012, the City of Waukesha established a goal and plan to reduce storm water flooding throughout the city. Based on property impact, public safety, financial leveraging, and environmental impact drainage priority areas were set that addressed street flooding.

Jefferson County's water and sewer systems are managed independently from various public works in small cities, towns, and villages including: Jefferson, Palmyra, Sullivan, Lake Mills, etc. Ozaukee County operates a Department of Public Works with a focus on transportation issues within the County and a Department of Land and Water Management with a focus on ~~water supply and waste management~~. According to the 2010 Ozaukee County report for the Department of Land and Water Management, a storm water outreach and education program was launched in the County to aid in the elimination of storm water from municipal separate storm sewer systems and 10 permits were issued for regions within the county to operate waste management protocols. ³⁴ Washington County, similar to Jefferson County, has several smaller ~~water and waste~~ ^{water} treatment facilities operated by cities, towns, and villages including Jackson, Addison, Port of Washington, etc. While each local water and/or waste management system serves to meet the needs of local residents, future land use and development projects will require collaboration across facilities and services.* A further discussion and graphic depiction of zoning issues related to water, sewer, and development occurs in the zoning section of this report.

Stakeholder Input

Stakeholders reported a high level of satisfaction with the quantity, distribution, and maintenance of community resources and public works, such as parks, recreational facilities, police and fire services, etc. Interviewees expressed pride in these facilities and their upkeep and noted that some police and fire services consisted of engaged community volunteers. Stakeholders identified strong school systems in each of the counties. Schools, parks, and recreational facilities were described as community assets. There were no barriers reported relate to resource allocation. A small number stakeholders did report awareness of instances in which students of racial and ethnic minority groups, primarily Hispanic and African American, were teased and discriminated against by students in the school systems, especially in the middle and high schools.

Why single out Ozaukee County for stormwater permits? See attached list for other ~~relevant~~ municipal permits; be complete or delete Ozaukee.

land and water conservation and protection.

to portions of Thiensville and Mequon with water purchased from the City of M. Waukesha.

The cities of Hartford and West Bend, ~~and~~ the villages of Jackson, Kewaskum, Newburg, and Slinger, and a portion of the Town of Addison. A portion

Public water and sanitary sewer systems in Ozaukee County are operated by the cities of Port Washington and Cedarburg and the villages of Belgium, ~~Waukegan~~ Fredonia, Grafton, and Saukville. ~~The cities of~~ The village of Thiensville and portions of the city of Mequon are served by MMSD of Mequon. We-Energies provides water service (sewer service). ~~Waukegan~~

³⁴ <http://www.co.ozaukee.wi.us/ArchiveCenter/ViewFile/Item/165>

of the village of Germantown is served by MMSD. Public water utilities are operated by each of these municipalities, with the exception of the village of Newburg.

(sewer service). We-Energies provides water service

must take to prevent or remove housing discrimination within their jurisdictions, state law does recommend that local governments enact anti-discrimination housing ordinances, and provides that such an ordinance may be “more inclusive in its terms or in respect to the different types of housing subject to its provisions” than the protected classes and types of housing protected by the WOHL alone. (§ 66.1011(2)).

Housing Affordability and Fair Housing Choice Issues Identified by: A Regional Housing Plan for Southeastern Wisconsin: 2035

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include the following:

- Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

Our research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The following narrative is not designed to assert whether a specific municipality’s zoning and land use codes create a per se violation of the FHA or HUD regulations, but to highlight areas where zoning and land use ordinances within the Study Area may otherwise jeopardize the spirit and intent of fair housing protections and HUD’s AFFH standards for its entitlement communities.

Due to the number of municipalities within the Study Area and cost and time constraints, individual zoning and land use ordinances within the Study Area were not independently reviewed. Rather, the issues and recommendations identified below are drawn from an extensive and detailed housing planning document titled *A Regional Housing Plan for Southeastern Wisconsin 2035*.

The Southeastern Wisconsin Regional Planning Commission (“SEWRPC”) is the planning agency for the seven-county Southeastern Wisconsin Region, which includes the counties of Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha, and the cities, ~~and~~ villages, therein (the “Region”). On March 13, 2013, the SEWRPC adopted and published an updated housing

and towns

b) Housing mix ratios as an impediment to affordable housing and fair housing choice.

A number of the Region's municipalities have adopted housing mix ratio policies (or rental percentage limitations) that unreasonably impede the development of affordable and low-income housing. A housing mix policy assigns a target percentage to permitted units of housing types (single family, two-family/duplex, townhomes, multifamily rental, condominium, etc.). Communities with sewer service that have adopted a policy recommending that 70 percent or more of the housing units in the community should be single-family (which are more likely to be owner-occupied as opposed to rental units) include the Villages of Fredonia and Thiensville in Ozaukee County, and the City of New Berlin and Village of Mukwonago in Waukesha County.

Housing mix ratios may impede fair housing choice as they create barriers to housing development based on actual market demands, and fail to take into account regional housing needs or future needs due to changes in demographics, shifting employment opportunities, and aging populations. Government-regulated limitations on the percentage of rental housing or affordable housing types have become the subject of fair housing discrimination complaints.

County AI
Recommendations

Zoning and land-use laws should accommodate housing and uses that are based on regional needs, and not simply maintain the status quo within an individual jurisdiction. The following recommendations illustrate concrete actions the municipalities could make in terms of their respective zoning and land use regulations to uphold the commitment to furthering fair housing. The issues highlighted below show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and still fulfill the zoning objective of protecting the public's health, safety, and general welfare.

a) Reduce minimum lot size and minimum floor area requirements and increase density allowances to promote the feasibility of developing affordable housing units.

Many of the surveyed jurisdictions' zoning and land use standards pose a risk of housing discrimination because they constitute exclusionary zoning that precludes development of affordable or low-income housing. Zoning codes which impose unreasonable residential design regulations (such as high minimum lot sizes, large minimum building square footage, and/or low maximum density allowances) that are not congruent with the actual standards necessary to protect the health and safety of current average household sizes, and which make the development of affordable housing cost prohibitive, may disproportionately impact minorities and low-income households.

The Regional Plan recommends that local governments that provide sanitary sewer and other urban services should amend their zoning codes and comprehensive plans to allow for the development of new single-family and two-family homes on lots of 10,000 square feet or smaller, with home sizes less than 1,200 square feet, to accommodate the development of housing affordable to moderate-

[Note: Although these recommendations 101 (RHP) are supported by the regional housing plan, and some are taken directly from it, it should be clarified that these are the AI recommendations vs. RHP recommendations.]

income households. Communities with sewer service also should provide zoning districts for the development of multi-family housing at a density of at least 10 units per acre, and 18 units or more per acre in highly urbanized communities or areas of the Region with higher land costs such as infill and redevelopment, to accommodate the development of housing affordable to lower-income households. To promote fair housing choice, communities should include at least one district that allows single-family residential development of this nature and at least one district that allows multi-family residential development of this nature in their zoning ordinance. Where comprehensive plans identify new and expanding major employment centers outside central cities, additional zoning districts consistent with these standards should be included (“workforce housing”). This would increase housing opportunities for minority and low-income households near employment centers, and would also provide opportunities for minority and low-income households to live in areas with better schools and safer neighborhoods.

b) Expand sanitary sewer services.

In areas not served by a sanitary sewerage system, larger minimum lot sizes and lower densities may be required to meet State and County requirements for private onsite wastewater treatment systems (POWTS). However, communities that do not provide sanitary sewer service should not be given a pass on their obligation to support affordable housing development. A majority of the Region’s land area lies within unsewered communities, and not holding these municipalities to the same standard of providing for affordable and low-income housing dis-incentivizes them from extending sewer and other municipal services to these areas. Program funds should be allocated to infrastructure improvements like sewer service, so that more land becomes available that can support higher density multi-family developments and smaller lot sizes for single- and two-family developments.

in areas located within a planned sewer service area (see Map A)

c) Adopt flexible zoning regulations that permit higher housing densities and multiple housing types.

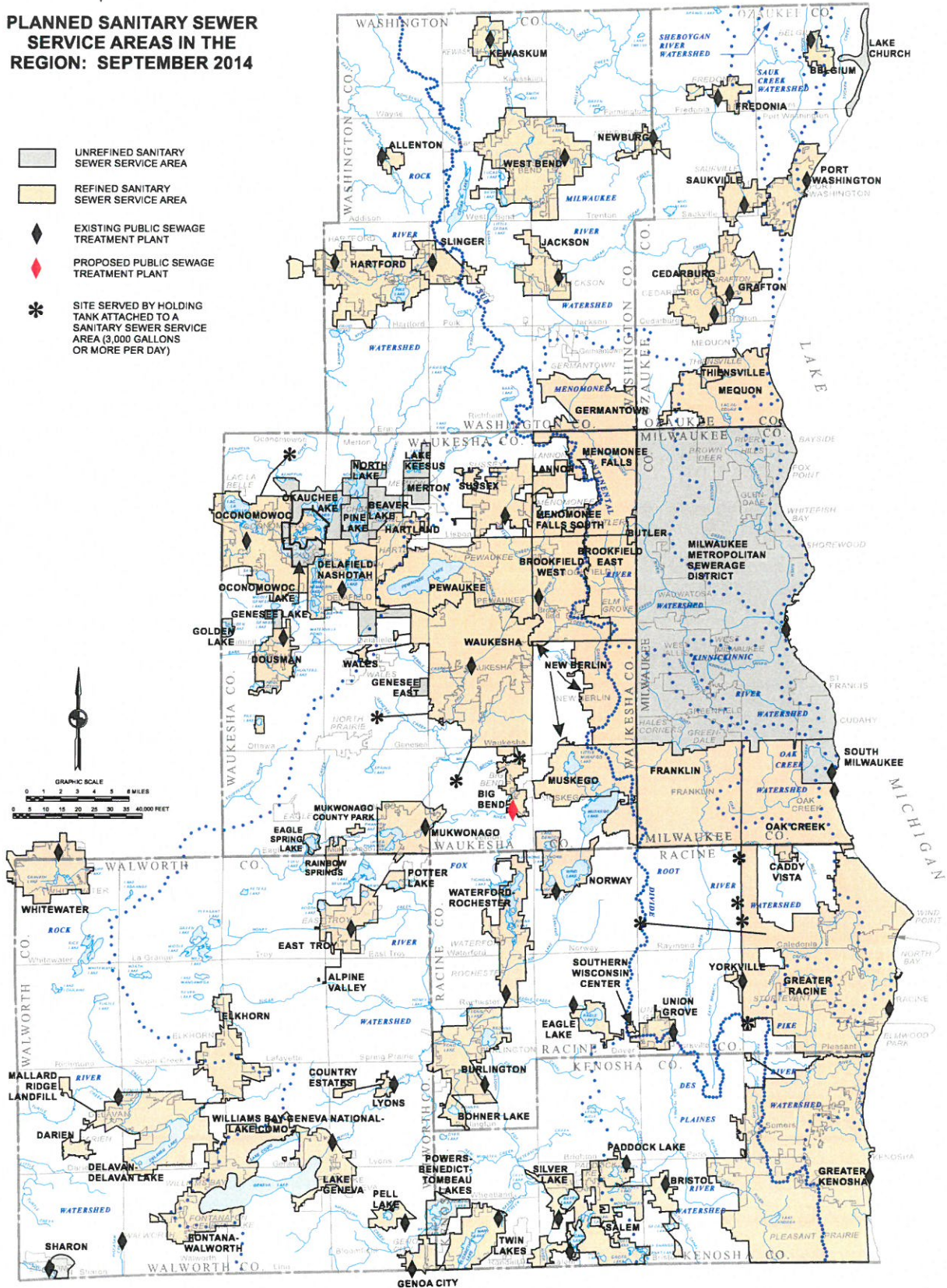
Some communities in the Region have embraced alternatives to traditional zoning that give the municipality and developers more flexibility in lot configurations, density, housing types, and mixed uses, by focusing on comprehensive plan goals rather than the strict regulatory requirements of the underlying zoning district. Alternative or flexible zoning regulations that have been used by local governments in the Region include Planned Unit Developments (PUD) and Traditional Neighborhood Developments (TND). Floating zones and conservation districts are other types of flexible zoning techniques. The Regional Plan finds that these types of flexible zoning regulations can result in an increase in affordable market based housing units and housing units that are more accessible to the Region’s aging population and persons with disabilities where density restrictions are relaxed.

A PUD is a special type of floating zoning district which generally does not appear on the municipal zoning map until a developer applies and is approved for the designation. Approval may include

Map (A)

PLANNED SANITARY SEWER SERVICE AREAS IN THE REGION: SEPTEMBER 2014




-  UNREFINED SANITARY SEWER SERVICE AREA
-  REFINED SANITARY SEWER SERVICE AREA
-  EXISTING PUBLIC SEWAGE TREATMENT PLANT
-  PROPOSED PUBLIC SEWAGE TREATMENT PLANT
-  SITE SERVED BY HOLDING TANK ATTACHED TO A SANITARY SEWER SERVICE AREA (3,000 GALLONS OR MORE PER DAY)

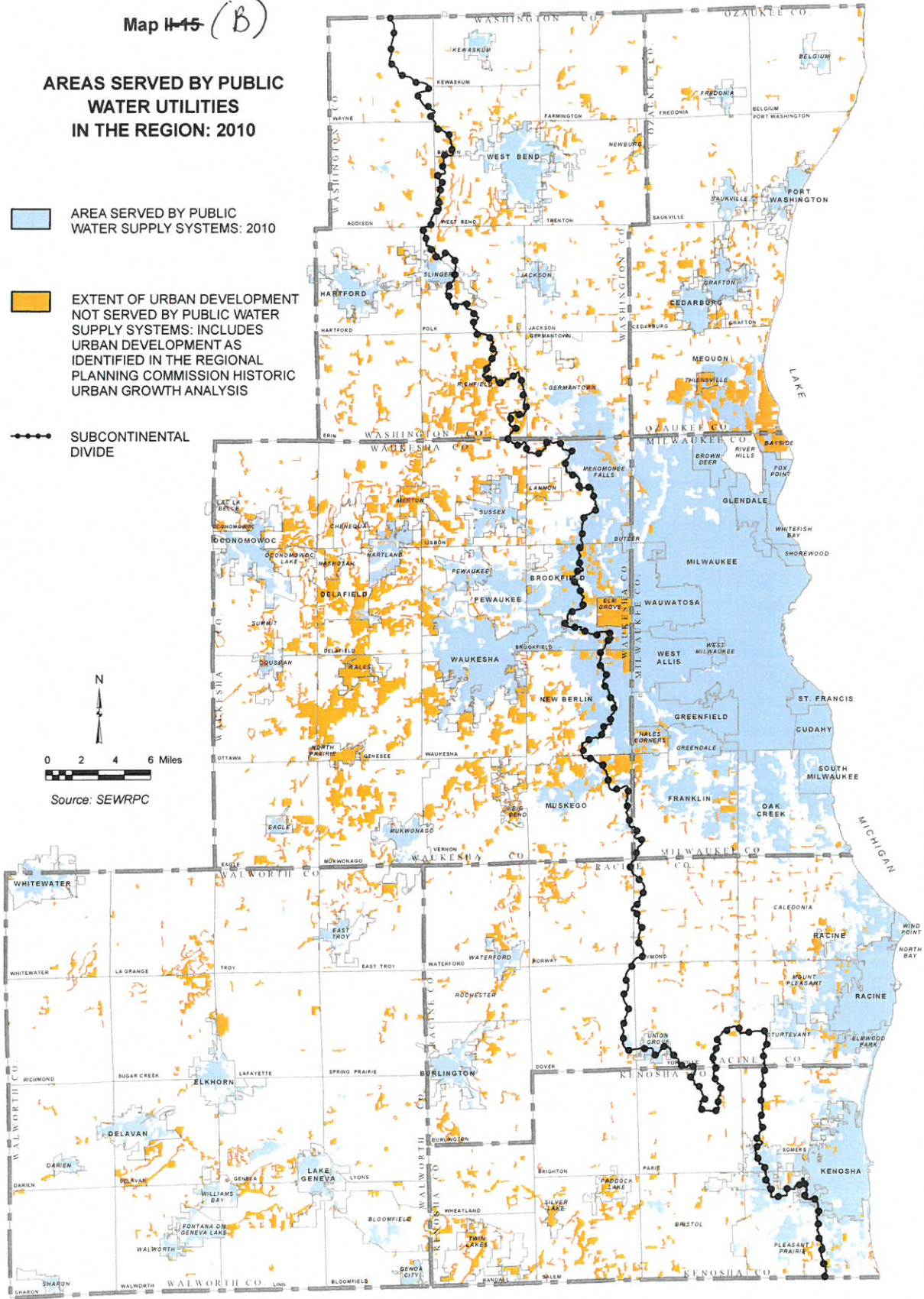
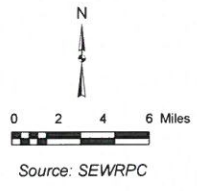


Source: SEWRPC.

Map H-15 (B)

AREAS SERVED BY PUBLIC WATER UTILITIES IN THE REGION: 2010

-  AREA SERVED BY PUBLIC WATER SUPPLY SYSTEMS: 2010
-  EXTENT OF URBAN DEVELOPMENT NOT SERVED BY PUBLIC WATER SUPPLY SYSTEMS: INCLUDES URBAN DEVELOPMENT AS IDENTIFIED IN THE REGIONAL PLANNING COMMISSION HISTORIC URBAN GROWTH ANALYSIS
-  SUBCONTINENTAL DIVIDE



From DNR website

**Wisconsin Department of Natural Resources
List of Municipalities Covered Under WPDES General Permit WI-S050075-2
September 2014**

NE	Winnebago	Oshkosh, City	31078
NE	Winnebago	Oshkosh, Town	31079
NE	Winnebago	University of Wisconsin Oshkosh	37187
NE	Winnebago	Vinland, Town	31080
NE	Winnebago	Winnebago County	33642
DNR REGION	COUNTY	MS4 PERMITTEE NAME	ID NUMBER
NO	Barron	Rice Lake, City	43682
NO	Douglas	Oliver, Village	31042
NO	Douglas	Superior, Village	31043
NO	Douglas	Superior, City	31044
NO	Douglas	University of Wisconsin Superior	37206
NO	Lincoln	Merrill, City	31427
DNR REGION	COUNTY	MS4 PERMITTEE NAME	ID NUMBER
SC	Dane	Bristol, Town	30920
SC	Dane	Cottage Grove, Town	30932
SC	Dane	Cottage Grove, Village	30921
SC	Dane	Dunkirk, Town	30922
SC	Dane	Dunn, Town	30923
SC	Dane	Pleasant Springs, Town	30924
SC	Dane	Stoughton, City	30925
SC	Dodge	Beaver Dam, City	31421
SC	Dodge	Waupun, City	31437
SC	Grant	University of Wisconsin Platteville	37190
SC	Green	Monroe, City	31428
SC	Jefferson	Fort Atkinson, City	31422
SC	Jefferson	Watertown, City	31435
SC	Rock	Beloit, City	31039
SC	Rock	Beloit, Town	31040
SC	Rock	Harmony, Town	31225
SC	Rock	Janesville, Town	31227
SC	Rock	Janesville, City	31226
SC	Rock	Milton, City	31229
SC	Rock	Rock County	33636
SC	Rock	Rock, Town	33637
SC	Rock	Turtle, Town	31041
SC	Sauk	Baraboo, City	31420
DNR REGION	COUNTY	MS4 PERMITTEE NAME	ID NUMBER
SE	Kenosha	Bristol, Village	31150
SE	Kenosha	Kenosha County	33645
SE	Kenosha	Kenosha, City	31157
SE	Kenosha	Paddock Lake, Village	31151

]*

Wisconsin Department of Natural Resources
List of Municipalities Covered Under WPDES General Permit WI-S050075-2
September 2014

SE	Kenosha	Pleasant Prairie, Village	31158
SE	Kenosha	Salem, Town	31153
SE	Kenosha	Silver Lake, Village	31154
SE	Kenosha	Somers, Town	31159
SE	Kenosha	Twin Lakes, Village	31155
SE	Kenosha	University of Wisconsin Parkside	37188
SE	Ozaukee	Cedarburg, Town	33651
SE	Ozaukee	Ozaukee County	33648
SE	Ozaukee	Port Washington, City	31430
SE	Ozaukee	Saukville, Village	31314
SE	Racine	Racine County	33638
SE	Racine	Sturtevant, Village	31165
SE	Racine	Wind Point, Village	31166
SE	Sheboygan	Howards Grove, Village	31121
SE	Sheboygan	Sheboygan County	33639
SE	Walworth	University of Wisconsin Whitewater	37207
SE	Walworth	Whitewater, City	31439
SE	Washington	Hartford, City	31423
SE	Washington	West Bend, City	31438
SE	Waukesha	Big Bend, Village	31252
SE	Waukesha	Delafield, City	33659
SE	Waukesha	Dousman, Village	31261
SE	Waukesha	Genesee, Town	31266
SE	Waukesha	Hartland, Village	31273
SE	Waukesha	Lannon, Village	31275
SE	Waukesha	Merton, Town	31279
SE	Waukesha	Merton, Village	31278
SE	Waukesha	Mukwonago, Village	35717
SE	Waukesha	Muskego, City	31280
SE	Waukesha	Nashotah, Village	31281
SE	Waukesha	North Prairie, Village	31283
SE	Waukesha	Oconomowoc, City	31284
SE	Waukesha	Oconomowoc, Town	31285
SE	Waukesha	Summit, Village	31316
SE	Waukesha	Vernon, Town	31317
SE	Waukesha	Wales, Village	31318
SE	Waukesha	Waukesha County	33641
DNR REGION	COUNTY	MS4 PERMITTEE NAME	ID NUMBER
WC	Dunn	Menomonie, City	31426
WC	Dunn	University of Wisconsin Stout	37194
WC	Eau Claire	Eau Claire County	30327

Handwritten asterisks and brackets on the right side of the table, indicating specific rows or groups of rows.

Melissa Mailloux

From: Sheena Villers
Sent: Monday, September 29, 2014 5:09 PM
To: Melissa Mailloux
Subject: Fwd: Draft- Consolidated Plan and AI Available for Comment
Attachments: 47. HRKHL-#1201999-v7-Town_of_Grafton__Title_9__Chapter_1_-_Zoning.pdf; ATT00001.htm; 2014-06-30 Land_Use_Plan-11-17.pdf; ATT00002.htm

FYI-a response from the email sent out

Sheena Villers
Human Resource Manager

123 Church Street, Suite 300
Marietta, Ga 30060

Sent from my iPhone

Begin forwarded message:

From: "Amanda Schaefer" <ASchaefer@townofgrafton.org>
To: "Sheena Villers" <info@wfnconsulting.net>
Subject: RE: Draft- Consolidated Plan and AI Available for Comment

Please note that the Town of Grafton now allows for Multi-Family Housing, as a new District was recently created (RM-1).

Please see the attached Future Land Use Map and Zoning Code.

Let me know if you have any questions.

Thank you,
Amanda

Amanda L. Schaefer
Clerk / Planner

Town of Grafton
1102 Bridge Street
Grafton, WI 53024
Phone 262.377.8500
Fax 262.377.0332
Web www.townofgrafton.org
Email aschaefer@townofgrafton.org

SIGN UP FOR TOWN E-UPDATES!

-----Original Message-----

From: Sheena Villers [<mailto:info@wfnconsulting.net>]

Sent: Monday, September 29, 2014 8:48 AM

Subject: Draft- Consolidated Plan and AI Available for Comment

Dear Community Stakeholder:

WFN Consulting has completed drafts of the 2015-2019 Consolidated Plan, 2015 Action Plan, and 2015-2019 Analysis of Impediments to Fair Housing Choice for Waukesha County and the HOME Consortium. The drafts have now been posted to the project website (<http://www.waukeshacountyconplan.com>) and are available for review. Any comments regarding these can be submitted by October 26, 2014 via the website. Stakeholders are also invited to comment on the plans at a public hearing on Monday, October 6, 2014 at 9:00 a.m., at the Waukesha County Administration Center Room 355/359, 515 W. Moreland Blvd., Waukesha, WI 53188.

For more information, additional locations to access the draft document, or alternative means to provide comments, please consult the attached public notice.

We thank you for your participation in the process thus far and look forward to receiving your feedback on the drafts.

Sheena Villers
Human Resource Manager

WFN Consulting, LLC
123 Church Street, Suite 300
Marietta, GA 30060
o: 770.420.5634
f: 770.420.5635
www.wfnconsulting.com

A simply different perspective on Community Development.

TITLE 9 - LAND USE REGULATION

Chapter 1 - Zoning

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structures above 576 square feet in area shall require a Conditional Use Permit. (See Sec. 9.1.4, TGO)

- (C) Conditional Uses. (See Sec. 9.1.4, TGO)
- (D) Lot Area and Width.

Lots shall have a minimum area of 40,000 square feet and shall not be less than 120 feet in width at the building setback line. Corner lots shall provide a minimum lot width of not less than 135 feet at the building setback line.
- (E) Building Height and Area.
 - (1) No primary building or parts of a primary building shall exceed 42 feet in height.
 - (2) The total minimum floor area of a dwelling shall be 1,250 square feet with a minimum first floor area of 1,000 square feet.
- (F) Yards.
 - (1) A minimum street yard (setback) of 50 feet from the highway or road right-of-way shall be required.
 - (2) A minimum shore yard of 75 feet from the high-water elevation of any navigable water shall be required.
 - (3) There shall be a side yard on each side of all structures of not less than 20 feet.
 - (4) There shall be a rear yard of not less than 25 feet.

9.1.3.08 RM-1 Multi-Family Residential District

The RM-1 Multi-Family Residential District is intended to provide for orderly and attractive multi-family development at appropriate locations within the Town of Grafton. The spirit of the RM-1 Multi-Family Residential District is proper implementation of a variety of dwelling unit types that exhibit proper site layout, building design, lighting, ingress and egress, parking, loading and unloading, landscaping, open space utilization, and stormwater management.

- (A) Permitted Uses.
 - (1) Multiple family housing structures not exceeding twelve (12) dwelling units per building; each dwelling unit shall be a minimum seven hundred (700) square feet, with two hundred (200) additional square feet for each bedroom over one (1) bedroom.
 - (2) Multiple family senior (age 55+) housing structures not exceeding twelve (12) dwelling units per building; each dwelling unit shall be a minimum seven hundred (700) square feet, with two hundred (200) additional square feet for each bedroom over one (1) bedroom.
 - (3) Multiple family attached row housing or townhome structures of not less than three (3) or more than eight (8) residential dwelling units per building; each dwelling unit shall be a minimum one thousand two hundred (1200) square feet, with two hundred (200) additional square feet for each bedroom over one (1) bedroom.
 - (4) Essential Services.
- (B) Permitted Accessory Uses.
 - (1) Private garages and carports specifically for residents of the units.

- (2) Paved parking areas specifically for residents of the units, guests of the residents, and any potential service employees.
- (3) Gardening, tool and storage sheds, not exceeding two hundred (200) square feet in area, incidental to the residential use and property maintenance.
- (4) Private residential outdoor recreation facilities, such as basketball courts or tennis courts.
- (C) Conditional Uses.
 - (1) Public and private schools.
 - (2) Churches and other religious institutions.
 - (3) Nursing homes and assisted living facilities.
- (D) Lot Area and Width.

All new lots created after August 11, 2010, shall have a minimum of 40,000 square feet and shall be not less than 120 feet in width at the building setback line. Corner lots shall provide a lot width of not less than 135 feet at the building setback line.
- (E) Building Height and Area.

No building or parts of a building shall exceed three (3) stories or forty-two (42) feet in height, whichever is less. Height shall be measured as the vertical distance from the height roof peak or point at the front (street side) of the building to the finished grade at the front (street side) of the building.
- (F) Yards.
 - (1) A minimum street yard (setback) of 50 feet from the highway or road right-of-way shall be required.
 - (2) A minimum shore yard of 75 feet from the high-water elevation of any navigable water shall be required.
 - (3) There shall be a side yard on each side of all structures of not less than 20 feet.
 - (4) There shall be a rear yard of not less than 25 feet.
- (G) Design Standards.
 - (1) Natural materials such as brick or stone are recommended for primary and accessory buildings. All facade orientations and architectural qualities shall be treated as equally important to the public view. Layering of facades or other special features shall be incorporated to define entrance areas, corners, and links to other buildings or public places. Materials shall be aesthetically compatible with other buildings in the immediate area.
 - (2) See Title 7, Chapter 6, TGO for sign provisions.
 - (3) Service, delivery, and waste disposal areas shall be located in the rear of buildings and can be visible from public areas but shall be (a) designed as visually attractive components of these areas or (b) visually separated from such areas. All refuse shall be stored in covered containers and must be stored in a screened and secured area. Design shall be compatible with that of the principal building. High quality solid gates for trash enclosures are required.

There shall be no outdoor storage or display of materials, equipment, or merchandise.

- (4) Create significant landscapes between buildings that encourage active use, along the public rights-of-way and may also serve as buffers when adjacent to single-family residential districts. Landscape elements shall be grouped together to create significant places such as groves or gardens. The minimum landscape requirements for any parcel within the RM-1 Multi-Family Residential District are as follows:

(a) Landscape Bufferyard.

The landscape bufferyard is defined in this district as the 20-foot wide area immediately abutting the property line of single-family residential districts. Plantings in the bufferyard will be arranged so they provide a full linear screening effect throughout the length of the bufferyard. Native plants are encouraged. For each 100 feet of length of landscape bufferyard (including percentages) the following landscaping is required within the bufferyard:

1. Two (2) Shade/Canopy trees per acre with at least a two-inch (2") caliper at the time of planting.
2. Four (4) Evergreen or Ornamental trees with at least a one and one-half inch (1½") caliper or height of four feet (4') at the time of planting.
3. Eighteen (18) shrubs at least two feet (2') in height at the time of planting.

(b) General Landscaping.

In addition to the requirements in the landscape bufferyard, general landscaping is also required on the remainder of the lot, including within the parking lot. Native plants are encouraged. The number of trees and shrubs required is based on the area of the lot not defined as a landscape bufferyard or occupied by a building. The area of the lot to be used for additional landscaping calculation = *total area of lot – (landscape bufferyard area + total building footprint)*. The resulting acreage shall be multiplied by each of the following to determine the minimum required landscaping per acre:

1. Eight (8) Shade/Canopy trees per acre with at least a two-inch (2") caliper at the time of planting.
2. Sixteen (16) Evergreen or Ornamental trees per acre with at least a one and one-half inch (1½") caliper or height of four feet (4') at the time of planting.
3. Sixty-four (64) shrubs per acre at least two feet (2') in height at the time of planting.

- (5) At least sixty (60) percent of the acreage for all natural woodland areas on a site shall be preserved. Natural woodland is defined as

an area of trees at least one (1) acre in size (measured by the edges of the tree canopies) and where at least fifty (50) percent of the trees have a diameter ten (10) inches or greater. Natural woodland that is cleared beyond the allowable area must be replaced with an area of trees one and one-half (1-1/2) times the difference between the allowable and actual clearance, as depicted on a landscape plan submitted by the applicant and approved by the Town. Replacement trees must have at least a two-inch (2”) caliper at the time of planting, and shall not be counted towards landscape requirements in subsection 4 above.

- (6) Berms and other topographic changes that appear clearly artificial shall be discouraged, especially as visual barriers. Topographic changes shall be allowed when needed to accommodate drainage, reduce erosion, or otherwise enhance or preserve the natural environment.
- (7) Stormwater management facilities shall be designed as natural features with shapes that conform to and complement the existing topography and landscape. Proposed developments must maintain future stormwater run-off volumes at a rate equal to or less than existing stormwater run-off volumes under the condition of storms having a duration of 24 hours and recurrence intervals of two (2), five (5), ten (10), and one hundred (100) years, using on-site management practices approved by the Town Engineer. On-site management practices shall be used to remove at least eighty (80) percent of the total suspended solids under the post-development conditions, as determined by a water quality model approved by the Town Engineer.
- (8) Include pathways for pedestrians and bicyclists and link them frequently to entrance areas, internal roads, building edges and entrances, public places, and significant landscaped areas.
- (9) See Section 9.1.5.01 for parking requirements. The following also applies within this district: Off-street parking areas should be located in the rear or side of buildings, but may be located in the street yard provided that parking elements do not impede the view corridor. Parking area edges should utilize building forms, landscaping, fencing, light fixtures, or combinations of these elements where feasible. Off-street parking areas shall include distinctive paving patterns and material changes to identify pedestrian paths, special crossing areas, and entrances to the space from surrounding development. Applicants are encouraged to pave off-street parking areas, driveways, and loading areas with porous, light-colored paving materials (e.g. concrete or brick pavers), provided that the material meets the requirements of Subsection 9.1.5.01(D) . Edges of off-street parking areas shall be set back a minimum of 6 feet from all lot lines. Off-street parking areas with more than ten (10) stalls shall have at least ten percent

(10%) of the interior parking area landscaped, preferably through the use of bioswales. Such interior parking area landscaping can be counted towards the general landscaping requirements.

- (10) The maximum height for all light poles shall be 20 feet. Luminaries shall be of a cut-off type that direct light downward. Decorative lights are required with cut-offs when the property is adjacent to a single-family residential area.
- (11) Limit the number of vehicular access drives serving a lot or parcel as well as vehicular access to any adjoining arterial, collector, or minor street. Permitted vehicular access drives should incorporate gateway features with materials similar to those used on the primary structure. Such gateways and entrances shall be designed so as to allow for sufficient sight lines for traffic movement.

(H) Plans and Specifications to be Submitted to Plan Commission.

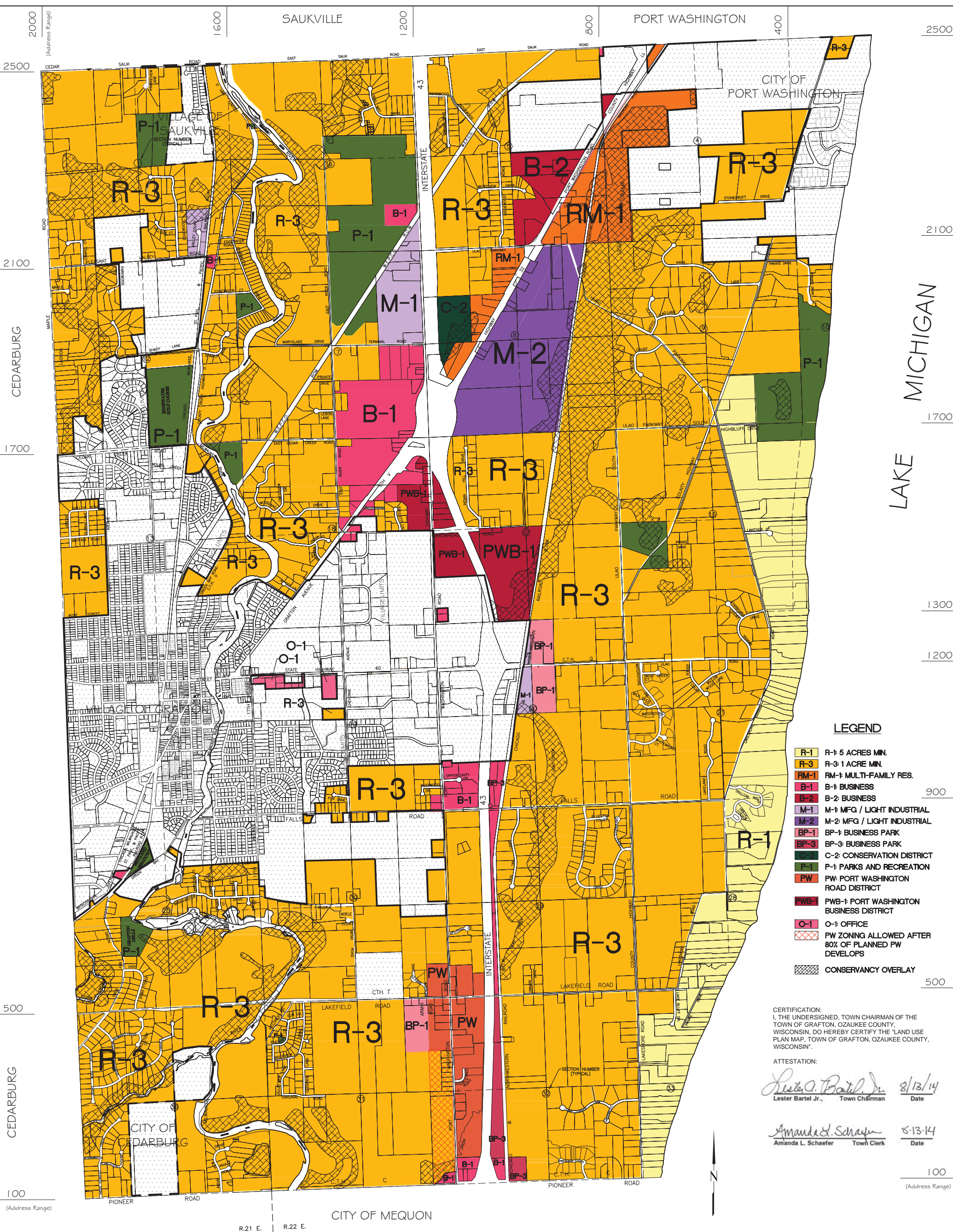
- (1) To encourage a built environment that is compatible with the character of the Town and surrounding community, building permits for permitted uses, permitted accessory uses and conditional uses in the RM-1 Multi-Family Residential District shall not be issued without review and approval of the Town of Grafton Plan Commission in accordance with the Design Standards set forth in this Chapter. Said review and approval shall be concerned with general layout, building plans, lighting, ingress and egress, parking, loading and unloading, landscaping, open space utilization, and stormwater management plan.
- (2) Applicants can request requirements for plan and specification submissions from the Town Engineer or Town Clerk.

9.1.3.09 B-1 Business District

The B-1 Business District is intended to provide for the orderly and attractive grouping at appropriate locations of retail and service establishments serving residents of the Town.

(A) Permitted Uses.

- (1) Bakery shops.
- (2) Barber shops.
- (3) Beauty shops.
- (4) Business offices.
- (5) Clothing stores.
- (6) Confectionaries and delicatessens.
- (7) Essential services.
- (8) Florists.
- (9) General retail.
- (10) Gift shops.
- (11) Hobby shops.
- (12) Jewelry stores.
- (13) Medical/Dental clinics.
- (14) Music stores.
- (15) Office supply stores.



LEGEND

- R-1 R-1 5 ACRES MIN.
- R-3 R-3 1 ACRE MIN.
- RM-1 RM-1 MULTI-FAMILY RES.
- B-1 B-1 BUSINESS
- B-2 B-2 BUSINESS
- M-1 M-1 MFG / LIGHT INDUSTRIAL
- M-2 M-2 MFG / LIGHT INDUSTRIAL
- BP-1 BP-1 BUSINESS PARK
- BP-3 BP-3 BUSINESS PARK
- C-2 C-2 CONSERVATION DISTRICT
- P-1 P-1 PARKS AND RECREATION
- PW PW: PORT WASHINGTON ROAD DISTRICT
- PWB-1 PWB-1 PORT WASHINGTON BUSINESS DISTRICT
- O-1 O-1 OFFICE
- PW ZONING ALLOWED AFTER 80% OF PLANNED PW DEVELOPS
- CONSERVANCY OVERLAY

CERTIFICATION:
I, THE UNDERSIGNED, TOWN CHAIRMAN OF THE TOWN OF GRAFTON, OZAUKEE COUNTY, WISCONSIN, DO HEREBY CERTIFY THE 'LAND USE PLAN MAP, TOWN OF GRAFTON, OZAUKEE COUNTY, WISCONSIN'.

ATTESTATION:
Lester A. Bartel, Jr. 8/13/14
 Lester Bartel Jr., Town Chairman Date

Amanda L. Schaefer 8-13-14
 Amanda L. Schaefer Town Clerk Date

PREPARED BY:

 12075 North Corporate Parkway
 Mequon, WI 53092 262-241-4466

THIS MAP IS NOT A CADASTRAL MAP. PROPERTY LINE LOCATIONS ARE APPROXIMATE ONLY.

LAND USE PLAN MAP

REVISED DATE:
 2014-06-11
 2014-06-30
 DRAWN BY: Adam Rock
 CHECKED BY: Matt Clementl
 APPROVED BY: Town of Grafton
 DRAWING:
 SCALE = 1:1000



P:\client\municipal\grafton_wi\140614\GISDATA\Projects\Land_Use_Planning

Melissa Mailloux

From: Jessica Wolff <jwolff@village.grafton.wi.us>
Sent: Monday, September 29, 2014 10:38 AM
To: Melissa Mailloux
Subject: Contact Us: Draft Plan input

Add a table of contents so readers can more easily find a particular section.
Note the other HOME counties on the title page and on the first page in the introduction.

Sent from IP Address: 24.106.45.18

This message was submitted from your website contact form:
<http://www.waukeshacountyconplan.com/comment.html>

Comments Received at the Public Hearing on Draft Reports

The following comments and questions were received at the public hearing on the draft Analysis of Impediments to Fair Housing Choice, 5-Year Consolidated Plan, and Annual Action Plan held on Monday, October 6, 2014 at 9:00 am at the Waukesha County Administration Center, Room 355/359, 515 West Moreland Boulevard, Waukesha, Wisconsin 53188.

- The presentation of the draft plans provides a nice summary. Will a copy of the presentation be made available?
- Were issues raised previously by Metro Milwaukee Fair Housing Council addressed in this Analysis of Impediments?
- A key issue raised in the Analysis of Impediments is related to zoning in municipalities within the four-county area. Waukesha County may have to think about how to act if municipalities do not change their zoning codes.
- The Analysis of Impediments is much more thorough than the previous AI.
- It would be helpful to identify jurisdictions that are having zoning issues like is done in the SEWRPC *Regional Housing Plan*.
- The segregation analysis just looked at the four-county area and does not reflect that metro Milwaukee has the lowest Black suburbanization rate in the country. While the segregation analysis does discuss high levels of segregation in metro Milwaukee, that discussion is buried in that section rather than being at the forefront.
- The mention of “personal preference” as a reason for housing location choice ignores the many factors that may affect a person’s preference of where to live, some of which may include discrimination.
- The map of Black population by census tract looks very different if you include the City of Milwaukee. The map should be revised to include Milwaukee as well.
- What is going to happen now that impediments have been identified? How will recommendations be implemented?
- Now that the Consolidated Plan has identified needs, how will this be handled operationally?
- Who will approve the Analysis of Impediments to Fair Housing Choice and the Consolidated Plan?
- It is difficult to extract from the Consolidated Plan what the size of the problem is in Waukesha County and how many new affordable housing units are needed.

Appendix IV
Housing Complaint Data Requests & Responses

Melissa Mailloux

From: Kimberly Roberts
Sent: Thursday, July 24, 2014 1:19 PM
To: Debbie.Wills@hud.gov
Cc: Melissa Mailloux
Subject: FOIA Complaint Request
Attachments: Complaint Request Letter_HUD.pdf

Importance: High

Ms. Wills,

Please see the attached FOIA request for Fair Housing Discrimination Complaints Data for **Waukesha County, Wisconsin**. Please feel free to contact me at 404-391-8972 if you have any questions,
Thanks,

Kimberly Roberts, Ph.D.
Senior Project Manager

123 Church St. NE, Suite 300

Marietta, GA 30060

o: 770.420.5634

f: 770.420.5635

c: 404-391-8972

Email: kroberts@wfnconsulting.com

www.wfnconsulting.com

July 24, 2014

Ms. Debbie Wills
Chicago Regional Office of FHEO
U.S. Department of Housing and Urban Development
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard, Room 2101
Chicago, Illinois 60604-3507

Re: Fair Housing Discrimination Complaints Data Request

Dear Ms. Wills,

Waukesha County, Wisconsin is in the process of developing an Analysis to Impediments to Fair Housing Choice Study (AI), as required by HUD to certify that the Jurisdiction is affirmatively furthering fair housing choice. In order to identify and assess the region's Fair Housing issues, services, and activities, WFN Consulting has been contracted by the County to perform an analysis of housing discrimination complaints originating in Waukesha, Washington, Jefferson and Ozaukee counties, and municipalities within each of these four counties and is hereby requesting the following data via The Freedom of Information Act:

- Total number of housing discrimination complaints received by HUD regarding housing units located anywhere within Waukesha, Washington, Jefferson and Ozaukee counties for the period January 1, 2006 to July 1, 2014.
- The transaction area of the housing discrimination complaint (i.e. rentals, sales, mortgage lending, homeowners' insurance, advertising, harassment, homeowners' and condo associations, in zoning, and in homeless shelters.
- The status of all such complaints received: whether open or closed and, if closed, the reason, type of closure, and the dollar amount of any settlement.
- The basis/bases of all such complaints received including a tally of complaints per basis.

Please contact me if you have any questions regarding this request. I can be reached via email at kroberts@wfnconsulting.com or by phone at 770-420-5634.

Thank you for your help in this process. I look forward to your response and its assistance in completing this important document.

Sincerely,



Kimberly Roberts
Senior Project Manager



U.S. Department of Housing and Urban Development
Regional Director
Region V

AUG 18 2014

Kimberly Roberts
Senior Project Manager
WFN Consulting
123 Church Street, Suite 300
Marietta, GA 30060

Dear Ms. Roberts:

RE: Freedom of Information Act
FOIA Control Number: 14-FI-RO5-01965

The U.S. Department of Housing and Urban Development (“HUD”) has received your Freedom of Information Act (“FOIA”) request for information on the following:

1. Total number of housing discrimination complaints received by HUD regarding housing units located anywhere within Waukesha, Washington, Jefferson and Ozaukee counties for the period January 1, 2006 to July 1, 2014.
2. The transaction area of the housing discrimination complaint (i.e., rentals, sales, mortgage lending, homeowners’ insurance, advertising, harassment, homeowner’s and condo association, in zoning, and in homeless shelters.
3. The status of all such complaints received: whether open or closed and, if closed, the reason, type of closure, and the dollar amount of any settlements.
4. The basis/bases of all such complaints received including a tally of complaints per basis.

Enclosed with this correspondence are reports of the requested information. There is no charge for these reports.

The FOIA provides a right of access to federal agency records that exist and can be located in federal agency files. The FOIA authorizes federal agencies to exempt from disclosure certain information pursuant to statutory text that is often referred to as the FOIA exemptions. 5 U.S.C. § 552(b). Depending on the content at issue, an agency may elect to redact the content in the record or withhold the record entirely.

Debbie A. Wills, FOIA Liaison, is the official responsible for this determination. You may appeal this determination within 30 days from the date of this letter. Your appeal should include copies of your original request and this response, as well as a discussion of the reason(s) supporting your appeal. The envelope should be plainly marked to indicate that it contains a Freedom of Information Act appeal.

If you should decide to appeal this decision, please send your appeal to:

U.S. Department of Housing and Urban Development
Attention: FOIA appeals
Office of Ethics and Appeals Division, ELD
451 7th Street, SW, Room 2130
Washington, DC 20410

Furthermore, the 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS in any of the following ways:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740
E-mail: ogis@nara.gov, Telephone: 1-877-684-6448, Fax: 202-741-5769

For your information, your FOIA request, including your identity and any information made available, is releasable to the public under subsequent FOIA requests. In responding to these requests, the Department does not release personal privacy information, such as home address, telephone number, or social security number, all of which are protected from disclosures under FOIA Exemption 6.

Thank you for contacting HUD. Should you have any questions regarding this response, please contact Maurice J. McGough, Office of Fair Housing and Equal Opportunity, Region V Director, at (312) 913-8400. Please reference the FOIA Identification number above in any communication on this matter.

Sincerely,



Debbie A. Wills
Freedom of Information Act Liaison

Enclosure

Filed by Location - Ozaukee County

Page by:
Violation State and County: Wisconsin - Ozaukee County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation Zip Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
Disability	CY2007	05-07-0753-8	4/13/2007	Disability, Sex,	382 - Discrimination in terms/conditions/privileges relating to rental, 440 - Other discriminatory acts, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Multi-Family, 40 Units	53073	Plymouth	No Cause		1
		Total									1
	CY2009	05-09-1156-8	5/18/2009	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,			Port Washington	No Cause		1
		Total									1
Total										4	
Familial Status	CY2010	05-11-0265-8	11/23/2010	Race, Disability, Sex,	382 - Discrimination in terms/conditions/privileges relating to rental, 430 - Otherwise deny or make housing unavailable, 510 - Failure to make reasonable accommodation,	Multi-Family, 41 Units	53092	Mequon	Withdrawn with Resolution	Affirm. Action,	1
		Total									1
	CY2013	05-13-1166-8	7/30/2013	Disability,	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 471 - Failure to provide an accessible building entrance, 510 - Failure to make reasonable accommodation,	Multi-Family, 40 Units	53080	Saukville	Conciliated	Design and Construction,	1
		Total									1
Total										4	
Familial Status	CY2012	05-12-0831-8	5/9/2012	Familial Status, Sex,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices,		53074	Port Washington	Conciliated	Monetary, (\$1200), Training,	1
		Total									1
	CY2007	05-07-0753-8	4/13/2007	Disability, Sex,	382 - Discrimination in terms/conditions/privileges relating to rental, 440 - Other discriminatory acts, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Multi-Family, 40 Units	53073	Plymouth	No Cause		1
		Total									1
Total										1	
		05-09-1156-8	5/18/2009	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,			Port Washington	No Cause		1

Filed by Location - Washington County

Page by:
Violation State and County: Wisconsin - Washington County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation Zip Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
Disability	CY2009	05-09-0255-8	11/26/2008	Disability,	312 - Discriminatory/refusal to rent and negotiate for rental, 332 - False denial or representation of availability - rental,	Multi-Family,		West Bend	No Cause		1
		Total									3
		05-09-0604-8	2/13/2009	Disability,	310 - Discriminatory/refusal to rent,	Multi-Family,		Slinger	Conciliated	Housing, Other,	1
Disability	CY2009	05-09-0812-8	3/26/2009	Disability,	310 - Discriminatory/refusal to rent,	Multi-Family,	53095	West Bend	No Cause		1
		05-09-1455-8	7/13/2009	Disability, Retaliation	312 - Discriminatory/refusal to rent and negotiate for rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),		53090	West Bend	No Cause		1
		Total									3
Disability	CY2011	05-11-0561-8	1/31/2011	Disability,	380 - Discriminatory/terms, conditions, privileges, or services and facilities,		53022	Germantown	Conciliated	Housing, Other,	1
		Total									1
		05-13-1312-8	8/27/2013	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 500 - Failure to permit reasonable modification, 510 - Failure to make reasonable accommodation,	Duplex/2-Family, Condo Assoc.,	53086	Slinger	Conciliated		1
Disability	CY2013	Total									1
		05-06-1469-8	7/6/2006	Familial Status, National Origin,	381 - Discrimination in terms/conditions/privileges relating to sale, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Condo Assoc.,	53090	West Bend	Conciliated	Monetary, (\$2000), Other,	1
		Total									1
Disability	CY2008	05-08-0816-8	4/3/2008	Familial Status,	310 - Discriminatory/refusal to rent, 320 - Discriminatory advertising, statements and notices,		53027	Hartford	Withdrawn with Resolution	Monetary, (\$2000), Other,	1
		Total									1
		05-10-1351-8	7/8/2010	Familial Status,	312 - Discriminatory/refusal to rent and negotiate for rental, 320 - Discriminatory advertising, statements and notices,	3 or 4 Family,	53095	West Bend	Administrative Closure		1
Total										1	

Continued

Filed by Location -Washington County

Page by:
Violation State and County: Wisconsin - Washington County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation Zip Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
Familial Status	CY2010	05-10-1348-8	7/6/2010	Race, Familial Status,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices, 332 - False denial or representation of availability - rental, 380 - Discriminatory terms, conditions, privileges, or services and facilities,		53040	Kewaskum	Charged (HUD)		1
	Total										2
Retaliation	CY2012	05-12-1150-8	7/24/2012	Familial Status, National Origin,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Condo Assoc.,	53093	West Bend	No Cause		1
	Total										5
Retaliation	CY2009	05-09-1455-8	7/13/2009	Disability, Retaliation	312 - Discriminatory refusal to rent and negotiate for rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),		53090	West Bend	No Cause		1
	Total										1
CY2006	05-06-1468-8	7/6/2006	Familial Status, National Origin,	381 - Discrimination in terms/conditions/privileges relating to sale, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Condo Assoc.,	53090	West Bend	Conciliated	Monetary, (\$2000), Other,	1	
	Total										1
CY2007	05-07-1628-8	9/28/2007	Race,	310 - Discriminatory refusal to rent,		53027	Hartford	No Cause		1	
	Total										1
CY2008	05-08-0816-8	4/3/2008	Familial Status,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices,		53027	Hartford	Withdrawn with Resolution	Monetary, (\$2000), Other,	1	
	05-08-1427-8	7/17/2008	Disability,	473 - Failure to provide usable doors, 474 - Failure to provide an accessible route into and thru the covered unit, 475 - Failure to provide accessible light switches, electric outlets, etc., 476 - Failure to provide reinforced walls for grab bars,	Multi-Family,	53086	Slinger	Conciliated	Affirm. Action, Structural Modification, Monetary, (\$1500),	1	

Filed by Location - Waukesha County

Page by:
Violation State and County: Wisconsin - Waukesha County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation Zip Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
		05-06-0462-8	1/25/2006	Race,	310 - Discriminatory refusal to rent,		53051	Menomonee Falls	No Cause		1
		05-06-1267-8	5/31/2006	Race, Familial Status,	310 - Discriminatory refusal to rent, 382 - Discrimination in terms/conditions/privileges relating to rental,	3 or 4 Family,	53726	Madison	Withdrawn with Resolution		1
	CY2006	05-06-1850-8	9/7/2006	Race, Sex,	382 - Discrimination in terms/conditions/privileges relating to rental,	Duplex/2-Family,	53189	Waukesha	No Cause		1
		05-06-1819-8	8/24/2006	Race, Familial Status, Sex,	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Multi-Family,	53186	Waukesha	Administrative Closure		1
		Total									4
	CY2007	05-07-1349-8	7/31/2007	Race,	311 - Discriminatory refusal to negotiate for rental,		53066	Oconomowoc	No Cause		1
		Total									1
		05-08-0655-8	3/6/2008	Race, Disability, National Origin,	380 - Discriminatory terms, conditions, privileges, or services and facilities,		53189	Waukesha	No Cause		1
	CY2008	05-09-0215-8	11/21/2008	Race,	310 - Discriminatory refusal to rent,	Multi-Family,	53151	New Berlin	Administrative Closure		1
		05-09-0263-8	12/1/2008	Race,	312 - Discriminatory refusal to rent and negotiate for rental,	Multi-Family,	53186	Waukesha	Withdrawn with Resolution	Other,	1
		Total									3
		05-09-0505-8	1/12/2009	Race,	312 - Discriminatory refusal to rent and negotiate for rental,	Duplex/2-Family,	53051	Menomonee Falls	No Cause		1
	CY2009	05-10-0091-8	10/19/2009	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	Multi-Family, 45 Units	53051	Menomonee Falls	Administrative Closure		1
		Total									2
		05-10-1337-8	7/7/2010	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,			Waukesha	Withdrawn with Resolution	Housing, Other,	1
	CY2010	05-11-0019-8	10/6/2010	Race,	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable,			Waukesha	Administrative Closure		1

Filed by Location - Waukesha County

Page by:
Violation State and County: Wisconsin - Waukesha County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation ZIP Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
National Origin	CY2006	05-07-0100-8	10/24/2006	Familial Status, National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental.	Multi-Family,	53058	Nashotah	Withdrawn with Resolution	Housing,	1
		Total									1
National Origin	CY2007	05-07-1500-8	9/4/2007	National Origin,	331 - False denial or representation of availability - sale.			New Berlin	Administrative Closure		1
		Total									1
National Origin	CY2008	05-08-0655-8	3/6/2008	Race, Disability, National Origin,	380 - Discriminatory terms, conditions, privileges, or services and facilities,		53189	Waukesha	No Cause		1
		Total									1
National Origin	CY2009	05-09-1707-8	8/19/2009	Disability, National Origin,	381 - Discrimination in terms/conditions/privileges relating to sale,			Waukesha	Administrative Closure		1
		Total									1
National Origin	CY2009	05-09-1755-8	8/15/2009	Disability, National Origin,	450 - Discriminatory acts under Section 818 (coercion, Etc.),			Waukesha	Withdrawn with Resolution	Other,	1
		Total									2
National Origin	CY2010	05-11-0368-8	12/16/2010	National Origin,	384 - Discrimination in services and facilities relating to rental, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Multi-Family, 20 Units	53189	Waukesha	No Cause		1
		Total									1
National Origin	CY2011	05-11-1278-8	7/28/2011	Familial Status, National Origin,	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.),		53005	Brookfield	Withdrawn with Resolution	Housing,	1
		05-11-1467-8	9/8/2011	Race, National Origin, Color,	460 - Using ordinances to discriminate in zoning and land use,				Open		

Filed by Location - Waukesha County

Page by:
Violation State and County: Wisconsin - Waukesha County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation ZIP Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
Familial Status	CY2006	05-06-1267-8	5/31/2006	Race, Familial Status,	310 - Discriminatory refusal to rent, 382 - Discrimination in terms/conditions/privileges relating to rental,	3 or 4 Family,	53726	Madison	Withdrawn with Resolution		1
		05-06-1345-8	6/16/2006	Familial Status,	382 - Discrimination in terms/conditions/privileges relating to rental,	Multi-Family,		Waukesha	Administrative Closure		1
		05-06-1503-8	7/10/2006	Familial Status,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices,		53188	Waukesha	Conciliated	Affirm. Action,	1
		05-06-1506-8	7/10/2006	Familial Status,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices,	Duplex/2-Family,	53029	Hartland	Conciliated	Affirm. Action,	1
		05-06-1819-8	8/24/2006	Race, Familial Status, Sex,	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Multi-Family,	53196	Waukesha	Administrative Closure		1
		05-07-0100-8	10/24/2006	Familial Status, National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental,	Multi-Family,	53058	Nashotah	Withdrawn with Resolution	Housing,	1
	Total									6	
CY2008		05-08-0640-8	3/5/2008	Familial Status,	310 - Discriminatory refusal to rent,	Duplex/2-Family,	53189	Waukesha	Withdrawn with Resolution	Other,	1
		05-09-0192-8	11/12/2008	Familial Status,	312 - Discriminatory refusal to rent and negotiate for rental,		53051	Menomonee Falls	Conciliated	Other,	1
		Total									2
CY2009		05-09-0712-8	3/13/2009	Familial Status,	382 - Discrimination in terms/conditions/privileges relating to rental,			Hales Corners	Administrative Closure		1
		05-09-1345-8	6/23/2009	Familial Status,	312 - Discriminatory refusal to rent and negotiate for rental,	Duplex/2-Family,	53045	Brookfield	Administrative Closure		1
	Total									2	
CY2011		05-11-1278-8	7/28/2011	Familial Status, National Origin,	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.),		53005	Brookfield	Withdrawn with Resolution	Housing,	1

Filed by Location - Waukesha County

Page by:
Violation State and County: Wisconsin - Waukesha County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation ZIP Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
	CY2013	05-14-0160-8	11/21/2013	Race, Familial Status,	310 - Discriminatory refusal to rent,		53188	Waukesha	Open		1
	Total										1
	CY2014	05-14-0689-8	3/27/2014	Race, Familial Status,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices, 382 - Discrimination in terms/conditions/privileges relating to rental, 430 - Otherwise deny or make housing unavailable,		53188	Waukesha	Withdrawn with Resolution		1
	Total										1
	Total										13
Retaliation	CY2011	05-12-0119-8	11/4/2011	Disability, Retaliation	382 - Discrimination in terms/conditions/privileges relating to rental,	Multi-Family,	53186	Waukesha	Conciliated	Other,	1
	Total										1
		05-06-0462-8	1/25/2006	Race,	310 - Discriminatory refusal to rent,		53051	Menomonee Falls	No Cause		1
		05-06-0907-8	3/30/2006	Disability, Sex, Religion,	310 - Discriminatory refusal to rent,	Duplex/2-Family,	53189	Waukesha	Administrative Closure		1
		05-06-1267-8	5/31/2006	Race, Familial Status,	310 - Discriminatory refusal to rent, 382 - Discrimination in terms/conditions/privileges relating to rental,	3 or 4 Family, Multi-Family,	53726	Madison	Withdrawn with Resolution		1
		05-06-1345-8	6/16/2006	Familial Status,	382 - Discrimination in terms/conditions/privileges relating to rental,	Multi-Family,	53188	Waukesha	Administrative Closure		1
		05-06-1503-8	7/10/2006	Familial Status,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices,		53188	Waukesha	Conciliated	Affirm. Action,	1
	CY2006	05-06-1506-8	7/10/2006	Familial Status,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices,	Duplex/2-Family,	53029	Hartland	Conciliated	Affirm. Action,	1
		05-06-1850-8	9/7/2006	Race, Sex,	382 - Discrimination in terms/conditions/privileges relating to rental,	Duplex/2-Family,	53189	Waukesha	No Cause		1

Filed by Location - Waukesha County

Page by:
Violation State and County: Wisconsin - Waukesha County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation ZIP Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
		05-06-1819-8	8/24/2006	Race, Familial Status, Sex,	382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Multi-Family,	53186	Waukesha	Administrative Closure		1
		05-06-1872-8	9/12/2006	Disability,	510 - Failure to make reasonable accommodation,	Condo Assoc.,	53045	Brookfield	Withdrawn with Resolution	Affirm. Action,	1
		05-07-0100-8	10/24/2006	Familial Status, National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental,	Multi-Family,	53058	Nashotah	Withdrawn with Resolution	Housing,	1
		Total									10
		05-07-1349-8	7/31/2007	Race,	311 - Discriminatory refusal to negotiate for rental,		53066	Oconomowoc	No Cause		1
		05-07-1546-8	9/10/2007	Disability,	510 - Failure to make reasonable accommodation,			Oconomowoc	Conciliated	Affirm. Action, Housing,	1
		05-07-1500-8	9/4/2007	National Origin,	331 - False denial or representation of availability - sale,			New Berlin	Administrative Closure		1
		Total									3
		05-08-1400-8	7/15/2008	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 510 - Failure to make reasonable accommodation,	Multi-Family,	53029	Hartland	Withdrawn with Resolution	Other,	1
		05-08-0640-8	3/5/2008	Familial Status,	310 - Discriminatory refusal to rent,	Duplex/2-Family,	53189	Waukesha	Withdrawn with Resolution	Other,	1
		05-08-0655-8	3/6/2008	Race, Disability, National Origin,	390 - Discriminatory terms, conditions, privileges, or services and facilities,		53189	Waukesha	No Cause		1
		05-08-1431-8	7/17/2008	Disability,	471 - Failure to provide an accessible building entrance,	3 of 4 Family,	53072	Pewaukee	Conciliated	Affirm. Action, Monetary, (\$300),	1
		05-08-1614-8	8/6/2008	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation,	Condo Assoc.,		Oconomowoc	Conciliated	Affirm. Action, Monetary, (\$650),	1
		05-09-0192-8	11/12/2008	Familial Status,	312 - Discriminatory refusal to rent and negotiate for rental,		53051	Manomonee Falls	Conciliated	Other,	1

Filed by Location - Waukesha County

Page by:
Violation State and County: Wisconsin - Waukesha County

Major Bases (Complaints)	CY Filed	Case Number - HUD	Filing Date - HUD	Bases	Issues	Housing Type (Duplex, Co-op, etc.)	Violation ZIP Code	Violation City	Case Completion Type	Relief and Compensation Summary	Number of Filed Cases
		05-12-0447-8	2/8/2012	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 510 - Failure to make reasonable accommodation,	Condo Assoc.,	53186	Waukesha	No Cause		1
		05-12-0669-8	4/5/2012	Sex,	382 - Discrimination in terms/conditions/privileges relating to rental, 430 - Otherwise deny or make housing unavailable,	Multi-Family,		Waukesha	Withdrawn with Resolution		1
	CY2012	05-12-0681-8	4/10/2012	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 510 - Failure to make reasonable accommodation,	Condo Assoc.,	53186	Waukesha	Administrative Closure		1
		05-12-0682-8	4/10/2012	Disability,	472 - Failure to provide accessible and usable public and common user areas, 473 - Failure to provide usable doors,		53186	Waukesha	Administrative Closure		1
		05-12-1494-8	9/28/2012	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation,		53118	Dousman	Administrative Closure		1
		Total									5
		05-13-0682-8	4/5/2013	Disability,	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),		53188	Waukesha	Open		1
		05-13-1035-8	7/8/2013	Disability,	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities,	Multi-Family, 117 Units	53099	Sussex	Administrative Closure		1
	CY2013	05-13-1081-8	7/15/2013	Race,	311 - Discriminatory refusal to negotiate for rental,	Multi-Family,	53186	Waukesha	Withdrawn with Resolution	Other Affirmative Relief	1
		05-13-1079-8	7/15/2013	Disability,	382 - Discrimination in terms/conditions/privileges relating to rental,	Multi-Family,	53151	New Berlin	Conciliated	Monetary, (\$150), Other Accommodation,	1
		05-14-0161-8	11/21/2013	Race,	310 - Discriminatory refusal to rent, 380 - Discriminatory terms, conditions, privileges, or services and facilities,			Waukesha	Open		1

Melissa Mailloux

From: Kimberly Roberts
Sent: Thursday, July 24, 2014 1:33 PM
To: wrtisdale@fairhousingwisconsin.com
Cc: cwalker@fairhousingwisconsin.com; Melissa Mailloux
Subject: Fair Housing Complaint Data Request
Attachments: Complaint Request Letter_MMFHC.pdf

Importance: High

Mr. Tisdale,

Please see the attached fair housing complaint data request for **Waukesha, Washington, Jefferson and Ozaukee counties for the period January 1, 2006 to July 1, 2014.** Please feel free to contact me at 404-391-8972 if you have any questions,

Thanks,

Kimberly Roberts, Ph.D.
Senior Project Manager

123 Church St. NE, Suite 300

Marietta, GA 30060

o: 770.420.5634

f: 770.420.5635

c: 404-391-8972

Email: kroberts@wfnconsulting.com

www.wfnconsulting.com

July 24, 2014

Mr. William Tisdale, Executive Director
Metropolitan Milwaukee Fair Housing Council
600 E. Mason Street, Suite 401
Milwaukee, WI 53202

Re: Fair Housing Discrimination Complaints Data Request

Dear Mr. Tisdale,

Waukesha County, Wisconsin is in the process of developing an Analysis to Impediments to Fair Housing Choice Study (AI), as required by HUD to certify that the Jurisdiction is affirmatively furthering fair housing choice. In order to identify and assess the region's Fair Housing issues, services, and activities, WFN Consulting has been contracted by the County to perform an analysis of housing discrimination complaints originating in Waukesha, Washington, Jefferson and Ozaukee counties, and municipalities within each of these four counties and is hereby requesting the following fair housing complaint data:

- Total number of housing discrimination complaints received by the Metropolitan Milwaukee Fair Housing Council regarding housing units located anywhere within Waukesha, Washington, Jefferson and Ozaukee counties for the period January 1, 2006 to July 1, 2014.
- The transaction area of the housing discrimination complaint (i.e. rentals, sales, mortgage lending, homeowners' insurance, advertising, harassment, homeowners' and condo associations, in zoning, and in homeless shelters.
- The status of all such complaints received: whether open or closed and, if closed, the reason, type of closure, and the dollar amount of any settlement.
- The basis/bases of all such complaints received including a tally of complaints per basis.

Please contact me if you have any questions regarding this request. I can be reached via email at kroberts@wfnconsulting.com or by phone at 770-420-5634.

Thank you for your help in this process. I look forward to your response and its assistance in completing this important document.

Sincerely,



Kimberly Roberts
Senior Project Manager

Melissa Mailloux

From: William R. Tisdale <wrtisdale@fairhousingwisconsin.com>
Sent: Friday, July 25, 2014 1:08 PM
To: Kimberly Roberts
Cc: Melissa Mailloux
Subject: RE: Fair Housing Complaint Data Request

Ms. Roberts -

In response to your request, please be advised that the only information the Metropolitan Milwaukee Fair Housing Council releases to the public regarding fair housing data is that which is provided in our Annual Reports. Our Annual Reports can be accessed at our website - www.fairhousingwisconsin.com.

William R. Tisdale
President and CEO
Metropolitan Milwaukee Fair Housing Council
600 E. Mason Street, Suite 401
Milwaukee, WI 53202
www.fairhousingwisconsin.com



From: Kimberly Roberts [mailto:KRoberts@wfnconsulting.net]
Sent: Thursday, July 24, 2014 12:33 PM
To: wrtisdale@fairhousingwisconsin.com
Cc: cwalker@fairhousingwisconsin.com; Melissa Mailloux
Subject: Fair Housing Complaint Data Request
Importance: High

Mr. Tisdale,

Please see the attached fair housing complaint data request for **Waukesha, Washington, Jefferson and Ozaukee counties for the period January 1, 2006 to July 1, 2014..** Please feel free to contact me at 404-391-8972 if you have any questions,

Thanks,

Kimberly Roberts, Ph.D.
Senior Project Manager

123 Church St. NE, Suite 300

Marietta, GA 30060

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12

ANNUAL REPORT





FAIR

HOUSING

COUNCIL



ANNUAL REPORT 2012

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Letter from Michael Vruno, Board of Directors Chairperson

As we gathered in 2012 to celebrate the 35th anniversary of the Metropolitan Milwaukee Fair Housing Council (MMFHC), I paused to reflect on the huge successes this organization has had in advancing the cause of fair housing in Wisconsin.

In 35 years, MMFHC has handled over 7,000 complaints alleging illegal housing discrimination and conducted over 10,800 tests in the rental, sales, insurance and lending markets. MMFHC has also assisted over 600 complainants in filing lawsuits; roughly 98% (all but 8) brought to successful resolution for the complainant. Subsequently, plaintiffs have recovered over \$6.675 million in damages. Additionally, some clients have been able to secure the housing illegally denied them. MMFHC has also been involved in unusually complex cases, including 17 lawsuits brought since 1990 that were based on our systemic investigations. Our staff have also provided education on fair housing and fair lending laws to over 50,000 housing providers and consumers.

Despite these tremendous accomplishments, we know that illegal discrimination and segregation endure, in forms both new and old. Our work is needed as much as ever, and the current climate demands that we are innovative and unrelenting in protecting the civil rights of all Wisconsinites.

I ask you to be part of those efforts. With your contributions of time and financial support, we can make great things happen in our neighborhoods and in our State. Please visit www.fairhousingwisconsin.com and join me as a member of this excellent organization!

Sincerely,

Michael Vruno
Board of Directors Chairperson

Providing Quality Service for 35 Years

Prompted by prevailing patterns of racial and economic segregation, widespread discrimination in the housing market and an inadequate number of fair housing enforcement agencies, 40 citizens organized the Metropolitan Milwaukee Fair Housing Council (MMFHC) in 1977. A non-profit, membership-based organization, MMFHC is comprised of men and women who share a desire to create open and inclusive communities throughout Wisconsin.

Shortly after its formation, MMFHC received funding to embark on an ambitious full-service fair housing program. This continues today, as MMFHC works to promote fair housing throughout the State of Wisconsin by combating illegal housing discrimination and by creating and maintaining racially and economically integrated housing patterns. MMFHC serves Milwaukee, Washington, Waukesha, Ozaukee, Dane, Outagamie, Brown, Winnebago and Calumet Counties, and conducts some out-of-service-area activities as well.

MMFHC operates two satellite offices, the Fair Housing Center of Greater Madison (FHCGM) and the Fair Housing Center of Northeast Wisconsin (FHCNW). FHCGM has been in existence since 1998, and FHCNW's work began in 2002.

During the past 35 years, MMFHC has established an impressive record of accomplishments and assumed a leadership role in the struggle for equal opportunity in housing.

Enforcement Program Activities

MMFHC provides complaint intake and investigative services to persons who allege violations of local, state and federal fair housing laws. As a part of these services, MMFHC counsels clients on their options for administrative and judicial remedy, assists clients in filing complaints with administrative enforcement agencies and makes referrals to attorneys. In addition, MMFHC conducts investigations into systemic forms of discrimination in the housing market and maintains a pool of volunteers who assist in fair housing enforcement activities.

Intake of Fair Housing Complaints

MMFHC received 171 housing discrimination complaints in 2012. Due to the complex nature of discrimination, some complaints were based on more than one protected class.

The protected class basis of complaints in 2012 was as follows:

Metropolitan Milwaukee

Age	4
Ancestry	1
Disability	40
Familial Status	17
Lawful Source of Income	6
Marital Status	3
National Origin	6
Race/Color	30
Sex	7
Sexual Orientation	1
Status as Victim of Domestic Abuse, Sexual Assault or Stalking	2

Dane County

Age	3
Disability	16
Familial Status	5
Lawful Source of Income	5
Marital Status	2
National Origin	1
Race	16
Religion	1
Section 8 Rent Assistance	5
Sex	2
Status as Victim of Domestic Abuse, Sexual Assault or Stalking	1

Northeast Wisconsin

Age	2
Disability	14
Familial Status	9
Lawful Source of Income	3
Marital Status	1
National Origin	2
Race	8
Sex	4
Status as Victim of Domestic Abuse, Sexual Assault or Stalking	1

Out of Service Area Complaints

Age	2
Ancestry	1
Disability	12
Lawful Source of Income	1
National Origin	1
Race	3
Religion	1

Referral of Complaints

The following are the numbers of complaints referred to administrative enforcement agencies and attorneys.

Attorneys	14
US Department of Housing and Urban Development (HUD)	4
Wisconsin Equal Rights Division (ERD)	3

COMPLAINTS

Fair housing organizations find Bank of America discriminates in the Midwest

MMFHC, the National Fair Housing Alliance (NFHA), the HOPE Fair Housing Center, the South Suburban Housing Center, and the Fair Housing Center of Central Indiana filed a federal housing discrimination complaint against Bank of America Corporation, Bank of America, N.A., and BAC Home Loan Servicing, LP. This complaint is the result of an investigation of Bank of America that found the financial giant maintains and markets foreclosed homes (also known as real-estate owned properties, or REOs) in white neighborhoods in a much better manner than in African American and Latino neighborhoods in Milwaukee, Chicago and Indianapolis.

This complaint, filed with HUD, is part of an amended complaint NFHA and seven member agencies filed earlier in the year examined how Bank of America has differently maintained and marketed properties in white, African American, and Latino neighborhoods across the country. NFHA and its member agencies are represented by Joseph M. Sellers and Peter Romer-Friedman of Cohen Milstein Sellers & Toll PLLC.

In the course of this investigation, fair housing organizations evaluated REO properties for the existence of 39 different types of maintenance or marketing deficiencies, such as broken windows and doors, water damage, overgrown lawns, no “for sale” sign, trash on the property, and other problems.

Without a “for sale” sign, for example, potential homebuyers would simply not know the property is available. Also, if there are unauthorized occupants or storm damage, neighbors have no one to call. With a “for sale” sign, neighbors can call a real estate agent to report these kinds of problems. In Milwaukee, 87% of Bank of America REO properties in communities of color were missing a “for sale” sign.

Trash on a property is not only an eyesore for neighbors, but it makes a home unappealing to visitors and can be a potential health and safety hazard. Regular maintenance would correct this problem, but in Milwaukee, 33% of all Bank of America REO properties in communities of color had substantial amounts of trash.

Broken locks or doors are an invitation to vagrants and possible criminal activity. Vagrants stay away from properties that are secured and regularly maintained and visited by responsible owners. In Milwaukee, 41% of properties had that deficiency.

Fifty-one percent of Bank of America-owned homes in Milwaukee’s communities of color had more than five maintenance or marketing problems.

“Neighbors living near Bank of America properties in African-American and Latino neighborhoods often report having to mow the lawn of the bank-owned home or clean up trash that has spilled onto nearby properties,” said William Tisdale, President and CEO of MMFHC. “Without the intervention of these responsible neighbors, we can only venture to guess how much worse the bank-owned homes would look. Bank of America-owned homes are not only eyesores, but they are health and safety hazards for neighboring families and young children. Through these, and other numerous examples of inaction and neglect, Bank of America has played a major role in destabilizing our neighborhoods.”

This complaint is still pending.

LaCrosse Race Discrimination Case Settles for \$57,500

Marcus and Brenda Young, an African American couple, successfully settled a race discrimination complaint against Victoria Gerrard, the owner of Geneva Terrace Apartments, a 96-unit complex located on Mormon Coulee Road in LaCrosse, and Nicolai Quinn, its manager. Gerrard will pay \$47,500 in damages to the Youngs, and will pay a fine of \$10,000 to the federal government.

The Youngs’ complaint stemmed from a series of interactions with Quinn that began in autumn of 2009. Between September 2009 and March 2010, the Youngs saw multiple advertisements for Geneva Terrace Apartments, both in newspapers and on signage outside the building. During that time period, they called the complex multiple times and visited once. Each time, they spoke with Quinn and asked if there were any 2- or 3-bedroom apartments available. In each instance, Quinn told the Youngs that there were none.

Concerned they were experiencing discrimination based on their race, the Youngs asked a white friend to call Geneva Terrace in March 2010 to inquire about available apartments. The white friend also spoke with Quinn, and when she asked about a 2-bedroom apartment available for May 1, he told her there was an available apartment. Brenda Young called about 15 minutes after her white friend, and also spoke with Quinn. When she asked about availability for May 1, Quinn told her that there were no available units until July or August.

The Youngs contacted MMFHC and filed a complaint, alleging that Quinn discriminated against them based on their race. MMFHC counseled them on their legal rights and conducted a testing investigation into their allegations. Testing is a controlled method of measuring and documenting differences in the quality, content and quantity of information and services

afforded to different homeseekers by a housing provider. In MMFHC’s investigation, multiple African American and white testers contacted Quinn. African American testers received different information than white testers, including being told nothing was available, when white testers were told of available units.

With assistance from MMFHC, the Youngs filed complaints with the US Department of Housing and Urban Development (HUD) and the Wisconsin Equal Rights Division (ERD) in October 2010. Subsequently, both agencies found in favor of the Youngs and issued charges of discrimination. Both HUD and ERD reviewed the testing evidence provided by MMFHC and cited it in their determinations. Following the charge of discrimination by HUD, the defendants elected to move the case to the United States District Court for final adjudication and the U.S. Department of Justice joined the case. MMFHC referred the Youngs to Attorney David Sparer of Herrick & Kasdorf.

In November 2012, the Youngs reached a settlement with Quinn and Gerrard. In addition to paying damages to the Youngs and a civil forfeiture to the federal government, the defendants will implement a non-discrimination policy and share the policy with all current tenants and employees. They will also post “equal housing opportunity” signs at all rental offices and buildings with available units, and will include language about provision of equal housing opportunities in all advertising and on all rental agreements and applications. Every person involved in renting, managing or operating Geneva Terrace Apartments will also participate in a two-hour fair housing training session. The U.S. Department of Justice will also monitor compliance by Geneva Terrace every six months for a period of five years.

Green Bay Race Discrimination Lawsuit Settles for \$35,000

Barbara Robinson and Shelia Walker settled a federal lawsuit alleging illegal housing discrimination against Ken McCoy, the owner of multiple rental homes as well as a motorcycle dealership in Green Bay. McCoy will pay Robinson and Walker \$35,000 to settle their lawsuit, which alleged that he denied them housing because they are African American.

In August 2009, Shelia Walker saw an advertisement in the Green Bay Press-Gazette for a house for rent. She called the number in the ad and spoke with the owner, Ken McCoy. He told her that the house was located at 339 South Webster Avenue. He said that someone would be working there all day and that she could drop by anytime to see it. Walker and Robinson were happy to hear the home's address, since it was in an area they wanted to live in. Walker went to the home later that day, but no one was there. Walker called McCoy again and told him she'd tried to see it but no one was there, and asked if she could make an appointment to view it. He asked her where she was originally from, and she told him she was from Milwaukee. He told her that he would not rent to anyone from Milwaukee, and that he had had "problems" with people from Milwaukee in the past. A few days later, Walker called McCoy again and asked McCoy to reconsider, and he told her that the neighbors might have "trouble with it," and that it was a nice neighborhood and he wanted to keep it that way.

Concerned that McCoy had discerned Walker's race over the telephone and was discriminating against them because of it, Walker and Robinson contacted MMFHC and each filed a complaint. MMFHC counseled Walker and Robinson on their legal rights and conducted a testing investigation into their allegations.

A white tester called McCoy and told him that she was moving to Green Bay from Milwaukee; she asked to make an appointment to see the home and McCoy agreed. The white tester called McCoy again later, to ask for the specific addresses of the homes available and to ask if McCoy would enter into a year-long lease. The white tester identified herself as the caller from Milwaukee, and again, McCoy had no negative response to the fact that she was moving from Milwaukee.

McCoy subsequently rented the home on South Webster Avenue to a white couple.

With assistance from MMFHC, Robinson and Walker filed housing discrimination complaints with ERD and HUD in January 2010. MMFHC also referred Robinson and Walker to Attorney Michael Cohn, and in March 2010, they elected to file a federal lawsuit. Both ERD and HUD issued charges in favor of Walker and Robinson, determining that there was reasonable cause to find that McCoy had violated fair housing law.

In August 2012, Robinson, Walker and McCoy reached a settlement agreement in federal court. McCoy paid Robinson and Walker \$35,000. Despite the settlement, "the experience still hurts," says Walker, "because it could happen again. People should know that discrimination still exists today. I don't want anyone to be treated like we were treated."

Robinson and Walker's attorney, Michael Cohn, notes that, "In the 21st century, it's unfortunate that people are still being denied housing because of their race, but it is more common than most people suspect."

Mother of Foster Children Settles Complaint Against Apartment Complex

Bonnie Perry successfully resolved a fair housing complaint against Tanya Ball and TLB Holdings, which own and manage a 17-unit apartment building at 4441-4451 North 103rd Street in Milwaukee. The respondents paid Perry \$7,500 and issued a letter of apology to her. In addition, they participated in mandatory fair housing training, will use the equal housing opportunity logo on all advertising and rental documents, and will advertise vacancies by listing them with local foster care agencies.

Perry's complaint stemmed from an interaction with Tanya Ball in September 2011. After seeing a sign in front of the building advertising 3-bedroom apartments for rent, Perry called to inquire about availability. In response to a question from Ball about the prospective occupants of the unit, Perry informed Ball that the unit would be for herself and her two foster children. Ball told Perry that they did not accept foster children.

Perry filed a complaint with MMFHC, and MMFHC counseled her on her fair housing rights and options for remedy. MMFHC also conducted an investigation in which a tester called Tanya Ball and inquired about a renting an apartment for herself and her foster children. Ball told the tester that she didn't want foster care taking place in her apartments. With MMFHC's assistance, Perry filed complaints with HUD and ERD in November 2011, alleging that Ball and TLB Holdings had discriminated against Perry based on her familial status. Both federal and state fair housing laws prohibit discrimination based on the presence of minor children in a household. The parties reached a settlement through HUD in May 2012, and Perry subsequently withdrew her ERD complaint.

Milwaukee Race Discrimination Complaint Settles for \$6,000

Maryam Bradford, an African American woman, has settled a fair housing complaint against Rong Di Chen, the owner of an apartment building at 1645 West Bolivar Avenue in Milwaukee. Di Chen will pay Bradford \$6,000.

In June 2011, Bradford called about a one-bedroom apartment she'd seen advertised on Craigslist. The person who answered the phone asked Bradford what color she was. Bradford replied that she was black, and was told that they'd have to call her back. She never received a call.

Bradford contacted MMFHC and filed a housing discrimination complaint. MMFHC counseled her on her legal rights and conducted a testing investigation into her allegation. In MMFHC's tests, testers called the phone number listed in Di Chen's ad, and were asked about their race, color and/or nationality. MMFHC assisted Bradford in filing complaints with HUD and ERD in December 2011. In March 2012, the ERD issued a charge and initial determination in favor of Bradford. Di Chen and Bradford reached a settlement agreement in October 2012 through the HUD administrative process, which included monitoring by HUD for one year.

Mother of Newborn Experiences Discrimination; Prevails in Fair Housing Complaint

Scharlene Laster achieved a settlement in a fair housing complaint against Marant Apartments, a company which manages Cormier Apartments, an 8-unit apartment building in Green Bay. Marant Apartments paid Laster \$5,000. In addition, employees of Marant Apartments will participate in mandatory fair housing training, and will use the equal housing opportunity logo on all internet and newspaper advertisements, as well as on all rental applications and leases.

Laster moved into a one-bedroom unit at Cormier Apartments in March 2011,

and gave birth to a baby girl late that September. On November 2, 2011, she received a notice of termination of tenancy from Tony Gillis, a manager with Marant. The notice stated: "Our office received a notice that you had a child within the past few months. We will not allow a tenant to have a minor child living at the building."

Laster filed a complaint with MMFHC, and MMFHC counseled her on fair housing rights and her options for obtaining a legal remedy. MMFHC also conducted an investigation in which a tester called Marant Apartments and inquired about

renting a unit at Cormier Apartments. Tony Gillis told the tester there were no children allowed in that building. With MMFHC's assistance, Laster filed complaints with HUD and ERD in February 2012, alleging that Marant Apartments and its employees had discriminated against Laster based on her familial status. Both federal and state fair housing laws prohibit discrimination based on the presence of minor children in a household. The parties reached a settlement through HUD in June 2012, and Laster subsequently withdrew her ERD complaint.

MMFHC Resolves Accessibility Complaint: Holmen Apartment Complex Will be Retrofitted

In October 2012, MMFHC successfully settled a housing accessibility complaint against Halfway Creek Apartments in Holmen, Wisconsin, and its architect, Thomas B. Lyons.

MMFHC's complaint, filed with the HUD in December 2011, was based on a testing investigation at Halfway Creek, an 80-unit complex in LaCrosse County. MMFHC's investigation uncovered inaccessible entrances, as well as inaccessible public and common use areas. For instance, the complex's fitness room was located on the second floor in a building with no elevator. MMFHC's HUD complaint alleged that these conditions violated the accessibility requirements of the Federal Fair Housing Act.

As part of the settlement, the respondents will designate an accessible parking space and make numerous physical modifications to apartments in the complex in order to improve accessibility. For instance, modifications will be made to bathroom doors to ensure sufficient floor space clear of the doors' swing, and wood beveling will be installed to reduce balcony door thresholds to three-quarters of an inch or less. Further, upon tenants' request, grab bars will be installed adjacent to toilets and bathtubs in ground-floor units; bathroom cabinets will be removed in order to provide for a frontal approach to sinks; bathroom doors with at least 30.5" width will be installed; and kitchen cabinet doors and knobs may be removed in order to provide the required 30" by 48" clear floor

space. Halfway Creek Apartments will notify all current residents of their rights to request accessibility-related modifications made at the complex's expense, and for the next 3 years, will also notify all prospective tenants that they may request such modifications, too. Halfway Creek has also moved its fitness room to a first-floor location. The respondents will pay MMFHC \$3,370 toward its costs and legal fees, and will use a fair housing poster in its rental office and a fair housing logo or slogan in its rental applications, promotional signage and advertisements. Finally, one or more partners in Halfway Creek Apartments will obtain fair housing training.

MMFHC was represented by Katherine L. Charlton of Hawks Quindel, S.C.

Discrimination Complaint Settles: Marquette County Landlord Pays \$3,900

April Dreikosen, a single parent, settled a housing discrimination complaint against Robert Brown. Brown will pay Dreikosen \$3,900 to settle the complaint, which alleged discrimination based on her family status, marital status and sex. Brown will also obtain fair housing training.

Dreikosen rented Brown's three-bedroom single-family home in Westfield from October 2008 until October 2010. In May 2010, Dreikosen and her husband separated and he moved out. She and her young son remained in the home, and that summer Dreikosen let Brown know that although her husband was no longer living there, she wanted to renew the lease for another year. She also told Brown that she was pregnant and due in January 2011. Brown subsequently told Dreikosen that he would not renew the lease because he thought she would be better off living elsewhere and he did not want her living in the house by herself. He told her it was a "two-person" lease. Dreikosen assured Brown that her income was certainly sufficient pay the rent, but he told her his decision was final. Brown later advertised the property with an ad that read, in part, "Owners are looking for a couple who appreciate a quality home at an attractive price."

Dreikosen contacted MMFHC and filed a complaint, alleging that Brown did not renew her lease based on her sex, familial status and marital status. MMFHC counseled her on her legal rights and conducted a testing investigation into her allegations. In MMFHC's investigation, Brown told a tester who was a single woman with a child that the current tenant was moving because she was "alone with a four-year-old" and that the home was four miles outside of Westfield, so that "if there

is a bad storm at night, [the area] might not get plowed right away the next morning." When a tester who was married with a child spoke to Brown, he did not give her similarly deterring information about the home.

With assistance from MMFHC, Dreikosen filed fair housing complaints against Brown with HUD and ERD in March 2011. In July 2011, the ERD issued an initial determination of probable cause to believe that Brown had refused to renew Dreikosen's lease based on her family status, marital status and sex. In its determination, the ERD cited MMFHC's testing evidence, the expression of preference for a "couple" in Brown's advertisement, and the timing of the non-renewal relative to the departure of Dreikosen's husband.

Dreikosen and Brown reached a settlement through HUD in September 2012, and Brown complied with the financial terms of the settlement in October. In addition to paying damages of \$3,900 to Dreikosen and receiving fair housing training, Brown agreed to advertise all available rentals with non-discriminatory language. He will also use the words "equal housing opportunity" or the HUD fair housing logo in all advertising and on all signs, brochures and other promotional materials.

Following the settlement, Dreikosen stated, "From the very first contact I had with Fair Housing Council, I was led step by step through a process where I could take a proactive role. I no longer felt like a victim with no recourse. The staff of the Fair Housing Council were outstanding in their professionalism and perseverance through what proved a long and difficult case. I am happy with this resolution, and it would have been impossible without Fair Housing Council."



Outreach and Education Program

The MMFHC Education and Outreach Program provides fair housing presentations and seminars to consumers, advocates and the general public. Staff also conduct training for property owners and managers, real estate agents and other members of the housing industry, and provide fair housing technical assistance to government agencies, civil rights organizations, social service agencies and housing providers.



Fair Housing Presentations and Seminars

The MMFHC Outreach and Education Program provides presentations and seminars to community-based organizations, social service agencies, educational institutions, advocacy groups, neighborhood organizations, religious congregations and the general public. In 2012, a HUD grant permitted MMFHC to expand its education and outreach work to several counties outside its 9-county service area.

This year, 97 fair housing presentations and seminars were conducted: 24 in the southeastern Wisconsin, 43 in south-central Wisconsin, and 30 in northeastern Wisconsin. These presentations and seminars reached over 1,580 individuals. Audience members received valuable information on the purposes and provisions of federal, state and local fair housing laws; the nature and prevalence of illegal housing discrimination; how to recognize a possibly discriminatory experience; the remedies available to victims of illegal discrimination, and more.

Fair Housing Training for Housing Providers

In 2012, MMFHC staff conducted 28 fair housing rental management training seminars throughout its service area. Over 610 individuals received training; these individuals own or manage thousands of rental units. The seminars cover in-depth information about local, state and federal fair housing laws; how to make reasonable accommodations and modifications for tenants with disabilities; advertising rental units in compliance with fair housing laws; non-discriminatory negotiation with prospective tenants, and much more. Attendees learn how to implement fair housing practices at every stage of a housing transaction, from showing available units to terminating tenancies.

Community Events

MMFHC staff participated in 21 community events such as Juneteenth Day celebrations, commemorations of the Dr. Martin Luther King, Jr. Holiday, community festivals and neighborhood fairs. Staff use these opportunities to recruit volunteers, distribute educational materials and build relationships with other organizations.

Information and Referral Services

In 2012, MMFHC provided information and referral services to over 1,260 callers with non-fair housing inquiries. Such inquiries are most commonly related to issues such as housing subsidies or financial assistance, tenant rights, housing repairs and other landlord-tenant concerns. When callers with non-fair housing questions contact MMFHC, they are provided general information about the protections provided by fair housing laws and are referred to an appropriate community group, government agency, social service agency or source of legal assistance.

Inclusive Communities Program

The Inclusive Communities Program provides technical assistance to community organizations, developers and local policy makers on inclusionary housing policies and the promotion of racial and economic integration. This Program also provides assistance with consumers' access to pro-integrative housing choices, and conducts research, analysis and documentation of fair and affordable housing opportunities and impediments.

The Inclusive Communities Program's 2012 activities to promote racially and economically integrated communities include the following:

- Conducted training on affirmatively furthering fair housing for City of New Berlin elected officials and staff.
- Created an Affirmatively Furthering Fair Housing Tool Kit for local government, housing providers and developers to serve as a resource guide on fulfilling fair housing obligations.
- Developed a booklet entitled *Opening New Doors: Choosing a Community in Metropolitan Milwaukee*, which describes 6 high-opportunity communities for housing consumers to consider when choosing a new home.
- Conducted 5 presentations and seminars to civic, academic and fair housing organizations on Milwaukee's segregated housing patterns and promotion of integration and inclusive housing policies, reaching 270 individuals.
- Served on the Southeast Wisconsin Regional Planning Commission Regional Housing Study Advisory Committee.
- Participated in the Milwaukee Housing Coalition and the Waukesha Housing Action Coalition, which work to increase housing choices for low-income households.
- Served on the City of Milwaukee's Housing Trust Fund Advisory Board.
- Provided technical assistance to Thrive Waukesha, a housing policy coalition.
- Participated with other civil rights and fair housing experts on the Poverty & Race Research Action Council's Civil Rights Task Force on Federal Housing Policy.
- Updated the City of Appleton's Analysis of Impediments to Fair Housing report.
- Conducted training for staff of CDBG and HOME entitlement jurisdictions on how to identify and address fair housing impediments.

Fair Lending

The Fair Lending Program promotes fair lending and foreclosure prevention, and seeks to eradicate predatory lending practices and mortgage rescue scams. This work is conducted through leadership of groups such as Take Root Milwaukee and the Milwaukee Foreclosure Partnership Initiative, and well as other local, regional and national partnerships. Staff monitor financial institutions' fair lending practices and Community Reinvestment Act (CRA) activities, and provide technical assistance and education for lenders, partner agencies and the general public.

In 2012, MMFHC Fair Lending Program activities included:

- Conducted complaint intake on 34 mortgage rescue scam allegations and helped complainants file complaints with local, state and federal regulatory and administrative agencies.
- Conducted 21 presentations on fair lending rights to 338 individuals.
- In collaboration with Outreach and Education Program staff, developed materials and provided fair lending training to staff of 9 homebuyer counseling agencies in underserved communities.
- Investigated loans that were alleged to violate fair housing laws, discussed options for remedy with clients, and made referrals to regulatory agencies, as appropriate.
- Coordinated 3 foreclosure prevention events in Milwaukee, providing in-person meetings to over 500 delinquent borrowers who were able to meet with a nonprofit homeowner counselor and/or with their loan servicer on the spot, and make progress toward avoiding foreclosure.
- As Chair of the Board of Directors of the National Community Reinvestment Coalition (NCRC), the Fair Lending Program's Senior Administrator chaired meetings of NCRC's Bankers Community Council and the Mortgage Finance Community Council, which meet quarterly with executives from the nation's largest mortgage lenders and mortgage insurers to address fair lending practices, underserved populations' access to capital and foreclosure prevention.
- Convened the Milwaukee Community Reinvestment Act Caucus, compiled community input and data, and met quarterly with banks to suggest ways to refine their products and services to better serve low- and moderate-income communities and communities of color. Successfully convinced a major lender not to discontinue a loan product serving undocumented immigrants, and to change the product from a 5-year adjustable rate mortgage to a 30-year fixed-rate loan.
- Worked with a coalition of community, faith-based and labor-based groups toward the establishment of a Responsible Banking Ordinance, as part of the Milwaukee Jobs Act.

MMFHC Takes National Leadership Role in Enforcement Training

In addition to its involvement in training fair housing organizations across the nation through the National Fair Housing Alliance's Fair Housing School, MMFHC is working to improve the quality and consistency of testing investigations and enforcement actions throughout the U.S. by developing a special project called Investigative Support for Testing and Enforcement Programs (ISTEP). With funding from a HUD grant, MMFHC has assembled a team of experienced fair housing practitioners and attorneys to provide intensive training and ongoing technical assistance to 8 non-profit organizations that operate fair housing testing and enforcement programs in different regions of the country. Thus far, MMFHC and its team of experts have provided comprehensive training on testing and enforcement work to 20 test coordinators and directors of other organizations. These 20 professionals will implement and share their new knowledge in markets across the nation, improving the capacity of victims to seek legal remedy and strengthening overall enforcement of fair housing laws.

In 2012, MMFHC staff played leadership and advocacy roles in a variety of other organizations, promoting MMFHC's mission and raising its visibility. A sampling of staff activities follows:

LEADERSHIP & ADVOCACY



Felita Daniels Ashley

- Member, Wisconsin Fair Housing Network

Laurel Bastian

- Board Member, Community Shares of Wisconsin
- Member, Homeless Services Consortium

Kristi Clover

- Member, Brown County Homeless and Housing Coalition
- Member, Fox Cities Housing Coalition
- Member, WinnebagoLand Housing Coalition

Lemuel Eaton

- Member, Office of the Commissioner of Insurance, Title Insurance Advisory Committee
- Member, Housing Resources Inc. Board of Directors

Bethany Sanchez

- Chair, National Community Reinvestment Coalition Board of Directors
- Mayoral Appointee, Steering Committee of the Milwaukee Foreclosure Partnership Initiative
- Vice-President, Urban Economic Development Association of Wisconsin Board of Directors
- Chair, Take Root Milwaukee's Foreclosure Outreach Workgroup
- Member, Selection Committee for the Milwaukee Awards in Neighborhood Development Innovation (MANDI)
- Member, Alliance for Economic Inclusion
- Member, Milwaukee Jobs Act Coalition
- Co-Convener, Wisconsin Consumer Roundtable

Kori Schneider Peragine

- Member, Regional Housing Study Advisory Committee of the Southeastern Wisconsin Regional Planning Commission
- Member, City of Milwaukee Housing Trust Fund Advisory Committee
- Member, Poverty and Race Research Action Council's Civil Rights Task Force on Federal Housing Policy
- Member, Wisconsin Fair Housing Network

William R. Tisdale

- Member, U.S. Congresswoman Gwen Moore's Advisory Committee on Housing
- Member, Wisconsin Advisory Commission to the US Commission on Civil Rights

Carla Wertheim

- Faculty Member, National Fair Housing Alliance Fair Housing School
- Appointee, HUD Fair Housing Initiatives Program Working Group

PEOPLE

MMFHC Honors U.S. Attorney James L. Santelle

In 2012, MMFHC recognized U.S. Attorney James L. Santelle with an Outstanding Leadership Award. As the chief federal law enforcement officer for the Eastern District of Wisconsin, Mr. Santelle has worked in partnership with MMFHC to promote fair housing throughout the region and to ensure that the U.S. Department of Justice brings its resources to bear in the creation of more equitable, inclusive communities.

2012 MMFHC Staff

William R. Tisdale,
President and Chief Executive Officer

Carla Wertheim,
Executive Vice President

Felita Daniels Ashley,
Senior Program Coordinator

Laurel Bastian,
Program Services Coordinator**

Margaret Bowitz, Senior Administrator
– Case Management Services

Kristi Clover,
Program Services Coordinator II*

Barbara Collins, Program Assistant II

Gabriella Dieguez, Program Assistant II

Lemuel Eaton,
Senior Program Coordinator

Olena Eichinger, Accountant

Barbara Guyer,
Administrative Services Manager

Gail Hyde, Senior Accountant

Justin Klug, Program Assistant

Deanna Richardson, Senior Program
Administrator – Investigative Services

Bethany Sanchez, Senior Administrator
– Fair Lending Program

Erika L. Sanders, Director –
Program Services

Rachel Scalise,
Support Services Coordinator II

Christine Schneider, Project
Coordinator - Special Projects

Kori Schneider Peragine,
Program Manager -
Inclusive Communities Program

Megan Wanke,
Administrative Services Coordinator

* Fair Housing Center of Northeast
Wisconsin office staff

** Fair Housing Center of Greater
Madison office staff

2012 Funding Sources

US Department of Housing
and Urban Development -
Fair Housing Initiatives Program

State of Wisconsin
Department of Commerce

State of Wisconsin
Department of Administration

City of Milwaukee
Community Development Block Grant
(CDBG) Program

Milwaukee County CDBG Program

Waukesha County CDBG Program

City of Appleton CDBG Program

City of Green Bay CDBG Program

City of Madison CDBG Program

City of Neenah CDBG Program

City of Oshkosh CDBG Program

City of Wauwatosa CDBG Program

Dane County CDBG Program

Community Shares of Wisconsin

Helen Bader Foundation

Greater Milwaukee Foundation

2012 MMFHC Board of Directors

Michael Vruno, Chairperson

Keith Cowan, Vice Chairperson

James Connolly, Secretary

Johnny Kimble, Jr., Treasurer

Carol Lobes

Richard Strode

William R. Tisdale

Henry Venzant

Mary Yank

2012 MMFHC Advisory Committee

Timothy J. Elverman, Chairperson

The Honorable Carl Ashley

Mary Bruce

State Representative Tamara Grigsby

Mildred Harpole

Milwaukee County Supervisor
Willie Johnson, Jr.

Ruth Zubrensky

2012 FHCGM Advisory Committee

Carol Lobes, Chairperson

Dane County Supervisor
Carousel Andrea Bayrd

Paul Fieber

Fabiola Hamdan

Tracy Miller

Toriana Pettaway

Merry Fran Tryon

2012 FHCNW Advisory Committee

Kathy Groat, Chairperson

Gayle Hardt

Stephen Hintz

Rosemary Jonas

Pastor G. Manns

Lisa Schneider

Scott Schnurer

Legal Counsel

General Counsel –
Katherine L. Charlton,
Hawks Quindel, S.C.

Litigation Counsel –
Michael J. Cohn,
Pledl & Cohn, S.C.

FAIR

HOUSING

COUNCIL

Metropolitan Milwaukee Fair Housing Council

600 East Mason Street, Suite 401, Milwaukee, WI 53202
414.278.1240 (phone) • 414.278.8033 (fax)

Fair Housing Center of Greater Madison

a program of the Metropolitan Milwaukee Fair Housing Council

600 Williamson Street, Suite L-4, Madison, WI 53703
608.257.0853 (phone) • 608.257.1445 (fax)

Fair Housing Center of Northeast Wisconsin

a program of the Metropolitan Milwaukee Fair Housing Council

4650 West Spencer Street, Suite 20, Appleton, WI 54914
902.560.4620 (phone) • 920.560.4621 (fax)

www.fairhousingwisconsin.com

Appendix V
Survey Instruments

Waukesha County Housing & Community Development Survey

Waukesha County has begun the planning process on the following documents:

- 1) 2015-2019 Consolidated Plan;
- 2) 2015 Annual Action Plan; and
- 3) Analysis of Impediments to Fair Housing Choice.

These documents are required by the U.S. Department of Housing and Urban Development (HUD) and are related to the local receipt of federal funds through the Community Development Block Grant (CDBG) and HOME Programs. Waukesha County is part of a 4-county consortium called the HOME Consortium, which also includes Jefferson, Ozaukee, and Washington Counties. These plans will identify needs related to housing, economic/community development, homelessness, and public facilities, and identify any fair housing barriers within the 4-county area.

A key component of this process involves hearing from members of the public on issues of community needs, fair housing, and housing choice. The questions on the following pages are intended to serve these purposes.

YOUR RESPONSES WILL BE KEPT STRICTLY CONFIDENTIAL. WE WILL ONLY REPORT THIS INFORMATION IN COMBINATION WITH THE OTHER SURVEY RESPONSES AND IN SUMMARY FORMAT TO PROTECT YOUR PRIVACY. Please do not place your name or other identifying information anywhere on the survey. You may discontinue your participation at any time without loss of benefits otherwise afforded to you. If you have questions about the use of survey information, please call WFN Consulting at 770-420-5634.

Estimate Time to Complete this Survey: 7-10 minutes

Waukesha County Housing & Community Development Survey

1. Please indicate the ZIP Code of your residence.

ZIP:

2. Where do you work?

- Waukesha County
- Jefferson County
- Washington County
- Ozaukee County
- Not currently working

Somewhere else (please specify)

3. Please SELECT the ONE income range that most accurately reflects your total household income.

- Less than \$10,000
- \$10,000 to \$14,999
- \$15,000 to \$24,999
- \$25,000 to \$34,999
- \$35,000 to \$49,999
- \$50,000 to \$74,999
- \$75,000 to \$99,999
- \$100,000 and above

4. Which is your age group?

- 18-24
- 25-34
- 35-44
- 45-54
- 55-61
- 62-74
- 75+

Waukesha County Housing & Community Development Survey

5. In which field(s) are you employed?

- Agriculture, forestry, fishing, hunting, and mining
- Construction
- Manufacturing
- Wholesale Trade
- Retail Trade
- Transportation, warehousing, and utilities
- Information
- Finance, insurance, and real estate
- Professional, scientific, and management
- Educational services, health care, and social assistance
- Arts, entertainment, accommodation and food services
- Public Administration
- Other Services
- Not Currently Working

Other (please specify)

6. The U.S. Census Bureau considers the following to be "minority groups:" Black, Asian, Pacific Islander, or American Indian/Alaska Native.

Are you a member of one of the groups listed above?

- Yes
- No

7. Is a language other than English spoken regularly in your household?

- Yes
- No

If yes, what language?

8. Does anyone in your household have a disability?

- Yes
- No

Waukesha County Housing & Community Development Survey

9. Which of the following are important considerations to you in choosing a place to live? (SELECT ALL THAT APPLY)

- Proximity to work
- Price of housing
- Adequate living space
- Attractiveness of surrounding area
- Access to reliable public transportation
- Condition of housing
- Safe area
- Quality of schools
- Convenience to facilities such as medical services and retail areas

Other (please specify)

10. How satisfied are you with your current place to live?

- Satisfied
- Somewhat satisfied
- Not satisfied

11. If you are not satisfied with your current place to live, what are the reasons for your dissatisfaction? (SELECT ALL THAT APPLY)

- Too far from work
- Too expensive
- Too small
- Too crowded
- Unattractive area to live
- Poor public transportation opportunities
- Housing in poor condition
- Unsafe area
- Poor public schools in area
- Not convenient to facilities such as medical services and retail areas

Other (please specify)

Waukesha County Housing & Community Development Survey

12. Please indicate your response to the following statements.

	Strongly disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Strongly agree
I believe homelessness is an issue in my county.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I believe housing affordability is an issue in my county.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I believe there are sufficient services for low and moderate income people in my county.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I believe there are sufficient transportation options for low and moderate income people in my county.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. Please rank the following Public Facility Needs in your county on a scale ranging from a low need to a high need.

	Low Need	Moderate Need	High Need
Community centers and facilities (i.e. youth centers, senior centers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child care centers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Community parks, recreational facilities, and cultural centers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health care facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public safety offices (fire, police, emergency management)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Street, road, or sidewalk improvements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other Public Facility Needs (please specify)

Waukesha County Housing & Community Development Survey

14. Please rank the following Economic/Community Development Needs in your county on a scale ranging from a low need to a high need.

	Low Need	Moderate Need	High Need
Facade improvements for businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial assistance for community organizations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial assistance to entrepreneurs and job creators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Redevelopment/rehabilitation/demolition of blighted properties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased code enforcement efforts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Historic preservation efforts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other Economic/Community Development Needs (please specify)

15. Please rank the following Public Service Needs in your county on a scale ranging from a low need to a high need.

	Low Need	Moderate Need	High Need
Employment training	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Youth services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Senior services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food banks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighborhood cleanups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transportation/shared ride taxis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Homeless services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Community meals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Childcare	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child abuse prevention/parenting classes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Domestic abuse services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Medical and dental services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Drug education/crime prevention	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other Public Service Needs (please specify)

Waukesha County Housing & Community Development Survey

16. Please rank the following Homeless Needs in your county on a scale ranging from a low need to a high need.

	Low Need	Moderate Need	High Need
Accessibility to homeless shelters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Programs to prevent homelessness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transitional/supportive housing programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Permanent housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other Homeless Needs (please specify)

17. Please rank the following Housing Needs in your county on a scale ranging from a low need to a high need.

	Low Need	Moderate Need	High Need
Down payment assistance/1st time homebuyer program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Homeowner rehabilitation grants/loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency improvements to current housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rental rehabilitation grants/loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New construction of housing for homeownership	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New construction of affordable rental units	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tenant based rental assistance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Elderly housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Family housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing for people with disabilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other Housing Needs (please specify)

Waukesha County Housing & Community Development Survey

18. Please select the residential category that best describes where you live.

- Rural (lot sizes of 1 acre or larger)
- Suburban (lot sizes of 1/2 acre to less than 1 acre)
- Medium density (lot sizes of 1/4 acre to less than 1/2 acre)
- High density (lot sizes under 1/4 acre or multifamily with 4 units or more per building)
- Hotel/motel
- I am homeless

19. Please indicate any challenges that you may have related to transportation. (CHECK ALL THAT APPLY)

- I do not have a car
- Transportation is not available from my home to my work
- Transportation is not available from my home to my medical services
- Transportation is not available to the public services I need
- Transportation is not available on weekends (Friday evening to Sunday)
- Transportation is not available weekdays after 5 pm
- I do not have any transportation challenges

20. Please check the frequency that you need transportation assistance. Count a round trip as one instance of assistance.

- 5 or more times per week
- 2-4 times per week
- 2-4 times per month
- Occasionally (once a month or less)
- I do not need transportation assistance

Waukesha County Housing & Community Development Survey

21. Since living in your county have you experienced housing discrimination?

- Yes
- No

22. If you answered yes to question 21, who discriminated against you?(CHECK ALL THAT APPLY)

- a landlord/property manager
- a real estate agent
- a mortgage lender
- a city/county staff person

Other (please specify)

23. Based on your response reporting that you have experienced discrimination, did you file a report of that discrimination?

- Yes
- No

24. If you answered NO, why didn't you file? (SELECT ONLY ONE)

- I did not know what good it would do
- I did not know where to file
- I did not realize it was a violation of the law
- I was afraid of retaliation
- The process was not in my native language
- The process was not accessible to me because of a disability

Other (please specify)

25. Do you understand your fair housing rights?

- Yes
- Somewhat
- No

Waukesha County Housing & Community Development Survey

26. Do you know where to file a housing discrimination complaint?

- Yes
- Somewhat
- No

27. What percentage of your monthly income is used for housing expenses (include rent or mortgage, taxes, insurance, and utility payments) ?

- less than 30%
- 30%
- 31-50%
- 51% or more
- I do not have any housing costs
- Not applicable

Waukesha County Housing & Community Development Survey

28. Please select whether any of the following are barriers to Fair Housing within your county.

	Barrier	Not a Barrier
Income levels of minority and female-headed households	<input type="radio"/>	<input type="radio"/>
Concentration of low-income housing in certain areas	<input type="radio"/>	<input type="radio"/>
Concentration of group homes in certain neighborhoods	<input type="radio"/>	<input type="radio"/>
Limitations on density of housing	<input type="radio"/>	<input type="radio"/>
Lack of adequate zoning for manufactured housing	<input type="radio"/>	<input type="radio"/>
Restrictive covenants by homeowner associations or neighborhood organizations	<input type="radio"/>	<input type="radio"/>
Limited capacity of a local organization devoted to fair housing investigation/testing	<input type="radio"/>	<input type="radio"/>
Lack of knowledge among residents regarding fair housing	<input type="radio"/>	<input type="radio"/>
Lack of knowledge among large landlords/property managers regarding fair housing	<input type="radio"/>	<input type="radio"/>
Lack of knowledge among real estate agents regarding fair housing	<input type="radio"/>	<input type="radio"/>
Lack of knowledge among bankers/lenders regarding fair housing	<input type="radio"/>	<input type="radio"/>

Other (please specify)

Waukesha County Housing & Community Development Survey

29. Please use the space on this page to provide any additional information regarding local housing and community development needs.

THANK YOU for your time in completing this survey and assisting with this housing and community development study.

If you are completing a printed copy of this survey, please return the completed survey to the following location:

Community Development Staff
c/o Waukesha County Administration Center
515 W. Moreland Blvd. Room AC 320
Waukesha, WI 53188

El Condado de Waukesha ha iniciado el proceso de planificación en los documentos siguientes:

- 1) 2015-2019 Plan de Consolidación;
- 2) Plan de Acción Anual para 2015 ; Y
- 3) Análisis de los Impedimentos para la Justa Selección de Vivienda.

Estos documentos son requeridos por el Departamento de Vivienda y Desarrollo Urbano de EE.UU. (HUD) y están relacionados con la recepción local de los fondos federales a través del bloque de Beca de Desarrollo Comunitario (CDBG) y los programas de HOME. El Condado de Waukesha es parte de un consorcio de cuatro condados llamado el Consorcio HOME, que también incluye los condados de Jefferson, Ozaukee, y Washington. Estos planes se identificarán las necesidades relacionadas con la vivienda, el económico, el desarrollo de la comunidad, la falta de vivienda, y los servicios públicos, e identificar cualquier barrera de equidad de vivienda en el área de los cuatro condados.

Un componente importante de este proceso consiste en escuchar de los miembros del público en temas de necesidades de la comunidad, justas vivienda, y la elección de vivienda. Las preguntas de las páginas siguientes están destinadas a servir a estos propósitos.

LA INFORMACION QUE USTED COMPARTA CON NOSTROS SERA ANONIMA Y LOS RESULTATOS SE REPORTATAN SOLAMENTE EN COMBINACION CON OTRAS REPUESTAS DE OTRAS ENQUESTAS, Y ESTO SERA EN FORMA RESUMIDA PARA PROTEGER SU PRIVACIDAD. Le pedimos que no ponga su Nombre o ninguna otra información de identificación, para mantener su privacidad. Usted Mantiene el derecho de terminar la encuesta en cualquier momento sin consecuencias. Si Usted tiene preguntas respecto a este estudio, por favor comuníquese con la oficina de WFN Consulting al 770 – 420 – 5634.

El Tiempo Estimados para Completar La Encuesta es: 7-10 minutos

Si no puede completar la encuesta en una sola sesión, asegúrese de hacer clic en "Siguiete" al final de la página para guardar sus respuestasy volver a la encuesta utilizando el mismo equipo. Si su navegador está programado para borrar (es decir, suprimir las cookies) oLas cookies no están habilitadas en su navegador, a continuación, sus respuestas no se guardan entre sesiones.

1. Indique el código postal en el que reside.

2. ¿Dónde Trabaja?

- En el condado de Waukesha
- En el condado de Jefferson
- En el condado de Washington
- En el condado de Ozaukee
- Actualmente no está trabajando
- En algún otro lugar (por favor, especifique)

En algún otro lugar (por favor, especifique)

3. ¿Cuál es el ingreso anual de su hogar? (Incluya todas las fuentes)

- Menos de \$10,000
- \$10,000 to \$14,999
- \$15,000 to \$24,999
- \$25,000 to \$34,999
- \$35,000 to \$49,999
- \$50,000 to \$74,999
- \$75,000 to \$99,999
- \$100,000 o más

4. ¿A qué grupo de edad pertenece?

- 18-24
- 25-34
- 35-44
- 45-54
- 55-61
- 62-74
- 75+

5. ¿En cuál de los siguientes campos trabaja?

- Agricultura, silvicultura, pesca y caza, y minería
- La Construcción
- La Fabricación
- Comerciales al por mayor
- Comercio Minorista
- Transporte y almacenamiento, y los servicios públicos
- Información
- Finanzas y seguros y bienes raíces y alquiler y arrendamiento
- Profesionales, Científicos, y Administrativos y Servicios de administración de Despojos
- Los servicios educativos y servicios de salud y asistencia social
- Otros servicios, excepto administración pública
- Administración Pública
- Actualmente no está trabajo

Otro (especifique)

6. La Oficina del Censo de EE.UU. considera que las siguientes son "grupos minoritarios:" Negro, Hispanos, asiáticos, isleños del Pacífico, o indios americanos / nativos de Alaska.

¿Es usted miembro de uno de los grupos mencionados anteriormente?

- Si
- No

7. ¿Hay otro idioma que no sea inglés hablado regularmente en su hogar?

- Si
- No

En caso afirmativo, ¿qué idioma?

8. ¿Hay alguien en su hogar que tiene una discapacidad?

- Si
- No

9. ¿Cuál de los siguientes son consideraciones importantes para usted en la elección de un lugar para vivir? (SELECCIONAR TODO LO QUE CORRESPONDA)

- Proximidad al trabajo
- Precios de vivienda
- Espacio de vida adecuado
- Zona atractivo para vivir
- El acceso confiable al transporte público
- Condiciones de Vivienda
- Área segura
- La calidad de las escuelas
- Conveniencia para las instalaciones como los servicios médicos y áreas comerciales
- Otros (especificar)

10. ¿Cuál es su nivel de satisfacción está con su situación de vida actual?

- Muy satisfecho
- Algo satisfecho
- Poco satisfecho
- En absoluto satisfechos

Otro (especifique)

11. Si usted no está satisfecho con su actual lugar para vivir, ¿cuáles son las razones de su?

Insatisfacción? (SELECCIONAR TODO LO QUE CORRESPONDA)

- Demasiado lejos del trabajo
- Demasiado caro
- Espacio de vida adecuado
- Muy concurrido
- Insuficiente acceso al transporte público
- Condiciones de vivienda inadecuada
- Zonas inseguras
- Zonas escolares inferiores
- No es conveniente para las instalaciones como los servicios médicos y áreas comerciales
- Otros (especificar)

Otro (especifique)

12. Por favor, indique su respuesta a las siguientes declaraciones.

	Fuertemente Desacuerdo	Algo Desacuerdo	ni de acuerdo ni en desacuerdo	Algo de acuerdo	Totalmente de acuerdo
Creo que los desamparados son un problema en mi condado	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creo que vivienda económica es un problema en mi condado.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creo que hay suficiente Servicios para personas con bajos Ingresos e ingresos moderados en mi condado.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creo que hay suficiente opciones de transporte para las personas con ingresos bajos y moderados en mi condado.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Otra Facilidad pública necesitan mencionados anteriormente

13. Por favor clasifique las siguientes necesidades de instalaciones públicas en Su condado sobre una escala que va desde un mínima necesidad de una alta necesidad.

	Necesidades Mínimas	Necesidades Razonables	Gran Necesidades
Centros Comunitarios e Instalaciones (Centros de Juventud, Centros de Mayores)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Centros de Cuidado de Niños	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Parques de la Comunidad, Instalaciones recreativas y Centros de Culturales	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Instalaciones Para El Cuidado Salud	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oficinas de Seguridad Pública (bomberos, Policía, Emergencias	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gestión)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mejoras de la calle, carretera o la acera	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Otra Facilidad público necesitan o mencionados anteriormente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Otras necesidades de equipamiento público (por favor, especifique)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Otros Desarrollo Económico / comunidad necesita no mencionados anteriormente

14. Por favor clasifique las siguientes necesidades de desarrollo económico/Comunidad en su Condado en una escala que se extiende desde un mínima necesidad de una alta necesidad.

	Necesidades Mínimas	Necesidades Razonables	Gran Necesidades
Mejoras de fachada para los negocios	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Asistencia financiera adicional para Las Organizaciones de la Comunidad	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Asistencia financiera para los empresarios y creadores de empleo	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reurbanización / Rehabilitación / Demolición Propiedades arruinadas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limpieza y Reurbanización de Desamparadas zonas industriales	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Aumento de los esfuerzos Reglamiento de Aplicación	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Esfuerzos de Conservación Histórica	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Otros Desarrollo Económico / comunidad necesita no mencionados anteriormente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Otras necesidades de vivienda no mencionados anteriormente

15. Por favor clasifique las siguientes necesidades de Servicio Públicas en su Condado sobre una escala que va desde menos necesidad de una alta necesidad.

	Necesidades Mínimas	Necesidades Razonables	Gran Necesidades
Entrenamiento de Empleo	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Servicios para los Juventud	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Servicios para los Mayores	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Despensas de alimentos	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limpieza de los vecindarios	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transporte / transporte compartido Taxis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Servicios para los desamparados	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Alimentación comunitaria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Centros de Cuidado de Niños	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prevención del abuso infantil/Clases de crianza apropiada	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Servicios de Abuso Doméstico	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Servicios de Medico y Dental	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
La educación sobre drogas / prevención del delito	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
otras necesidades de servicio público (por favor, especifique)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Otras necesidades para los Desamparados no mencionados anteriormente

16. Por favor clasifique las siguientes necesidades de Desamparados en su Condado sobre una escala que va desde un mínimo necesidades una alta necesidad.

- Accesibilidad de los refugios Para los desamparados
- Programas para prevenir la carencia de hogar
- Programas de vivienda Adicionales para Transición y de apoyo
- Vivienda Permanente
- Otras necesidades para los Desamparados no mencionados anteriormente

17. Por favor clasifique las siguientes Necesidades de Vivienda dentro de su Condado en una escala que va desde un mínimo necesidad una alta necesidad.

- Asistencia de Depósito/Programa de Propietario Por Primera vez
- Rehabilitación actual de Vivienda incluyendo Préstamos y becas Introducir mejoras en actual Vivienda para hacer más Eficiencia Energética
- Rehabilitación actual de Unidades de alquiler incluyendo Préstamos y becas
- Construcción de Casas Nuevas Para vivienda propia
- Nueva construcción de las unidades de alquiler asequibles
- Asistencia de Inquilino basada para el alquiler
- Vivienda para los Ancianos
- Vivienda para la Familia
- viviendas para personas con discapacidad
- otras necesidades de vivienda (por favor, especifique)

18. Por favor, seleccione la categoría residencial que mejor describe donde usted vive.

- Rurales (tamaño de los lotes de 1 hectárea o más grande)
- Suburbano (tamaño de los lotes de medio acre a menos de 1 acre)
- Densidad media (tamaños de lote de un cuarto acre a menos de medio acre)
- De alta densidad (lotes menores cuarto de acre o multifamiliares con 4 unidades o más por edificio)
- Hotel/Motel
- Estoy desamparado

**19. Sírvase indicar las dificultades que pueda tener en relación con el transporte.
(CONSULTAR
TODO LO QUE CORRESPONDA)**

- Yo no tengo un coche
- El transporte no está disponible de mi casa al trabajo
- El transporte no está disponible de mi casa con mis servicios médicos
- El transporte no está disponible para los servicios públicos que necesito
- El transporte no está disponible los fines de semana (viernes por la tarde a domingo)
- El transporte no está disponible entre semana después de las 5:00
- Yo no tengo ningún problema de transporte

Otro (especifique)

**20. Por favor, compruebe la frecuencia que usted necesita ayuda con el transporte.
Contando ida y vuelta como un viaje como una instancia de asistencia.**

- 5 o más veces por semana
- 2-4 veces por semana
- 2-4 veces al mes
- De vez en cuando (una vez al mes o menos)
- No necesito ayuda con el transporte

Otro (especifique)

21. ¿Viviendo en su Condado, has experimentado la discriminación de la vivienda?

- Si
- No

22. ¿Quién lo discriminó? (Marque lo que corresponda)

- El Dueño / Gerentede propiedad
- Un Agente de Bienes Raíces
- Un Prestamista Hipotecario
- Un Miembro del Personal de la Ciudad / Condado

Otro (especifique)

23. Sobre de su respuesta que ha sido víctima de discriminación, ¿Ha reportado la discriminación?

- Si
- No

24. Si usted no presentó un informe, ¿Por qué no presentó una queja? (SELECCIONAR UNA SOLA)

- Yo no sabía lo bueno que iba a hacer.
- No sabía dónde archivar.
- No me di cuenta que era una violación de la ley.
- Tenía miedo a las represalias.
- El proceso no fue en mi idioma.
- El proceso no era accesible para mí debido a una discapacidad.

Otro (especifique)

25. ¿Entiende sus derechos de equidad de vivienda?

- Si
- Un Poco
- No

26. ¿Sabe usted dónde archivar una queja de discriminación de vivienda?

- Si
- Un Poco
- No

27. ¿Qué porcentaje de su ingreso mensual se utiliza para gastos de vivienda? (incluye alquiler

O los pagos de la hipoteca, impuestos, seguros, y utilidades)

- Menos de 30%
- 30%
- 31-50%
- 51% o más
- No tengo los costos de vivienda
- No aplicable

28. Por favor seleccione si alguno de los siguientes son las barreras a la Equidad de Vivienda dentro de su Condado.

	Barrera	Ninguna Barrera
Los niveles de ingresos de la minoridad Y encabezados por mujeres Hogares	<input type="radio"/>	<input type="radio"/>
Concentración de bajos ingresos Vivienda en cierta Áreas	<input type="radio"/>	<input type="radio"/>
Las concentraciones de grupo Casas en cierta Vecindarios	<input type="radio"/>	<input type="radio"/>
Limitaciones a la densidad de Viviendas	<input type="radio"/>	<input type="radio"/>
La falta de una adecuada zonificación Para viviendas prefabricadas	<input type="radio"/>	<input type="radio"/>
Convenios restrictivos por Asociaciones de propietarios o Vecindario Organizaciones	<input type="radio"/>	<input type="radio"/>
Capacidad limitada de un local de Organización dedicada a la equitativa	<input type="radio"/>	<input type="radio"/>
Viviendas Investigación / ensayos	<input type="radio"/>	<input type="radio"/>
La falta de conocimiento entre Residentes respecto equitativa	<input type="radio"/>	<input type="radio"/>
Viviendas	<input type="radio"/>	<input type="radio"/>
La falta de conocimiento entre Arrendadores / administradores de propiedades	<input type="radio"/>	<input type="radio"/>
Respecto equitativa Viviendas	<input type="radio"/>	<input type="radio"/>
La falta de conocimiento entre Agentes de bienes raíces	<input type="radio"/>	<input type="radio"/>
Con respecto a la equidad de vivienda	<input type="radio"/>	<input type="radio"/>
La falta de conocimiento entre Banqueros / prestamistas	<input type="radio"/>	<input type="radio"/>

con respecto a

Vivienda justa

Otros (especificar)

Otro (especifique)

29. Por favor use el siguiente cuadro para proporcionar cualquier información adicional que usted cree que son las necesidades que deben ser abordados por el de la su Condado en cuanto a cuestiones de vivienda en la comunidad.

	<input type="text"/>
--	----------------------

GRACIAS por su tiempo en completar esta encuesta y ayudar con este estudio de vivienda y desarrollo comunitario
Si está completando una copia impresa de esta encuesta, por favor, devuelva la encuesta completada a la siguiente ubicación:

Community Development Staff
C/o Waukesha County Administration Center
515 W. Moreland Blvd. Room AC 320
Waukesha, WI 53188

Appendix VI
Survey Responses

Q1 Please indicate the ZIP Code of your residence.

Answered: 270 Skipped: 29

Answer Choices	Responses
Name:	0.00% 0
Company:	0.00% 0
Address:	0.00% 0
Address 2:	0.00% 0
City/Town:	0.00% 0
State:	0.00% 0
ZIP:	100.00% 270
Country:	0.00% 0
Email Address:	0.00% 0
Phone Number:	0.00% 0

#	Name:	Date
	There are no responses.	
#	Company:	Date
	There are no responses.	
#	Address:	Date
	There are no responses.	
#	Address 2:	Date
	There are no responses.	
#	City/Town:	Date
	There are no responses.	
#	State:	Date
	There are no responses.	
#	ZIP:	Date
1	53098	9/3/2014 5:10 PM
2	53551	9/3/2014 4:25 PM
3	53137	9/3/2014 4:22 PM
4	53549	9/3/2014 4:11 PM
5	53094	9/3/2014 4:03 PM
6	53549	9/3/2014 3:54 PM
7	53094	9/3/2014 3:48 PM
8	53551	9/3/2014 3:43 PM

9	53551	9/3/2014 3:33 PM
10	53094	9/3/2014 3:24 PM
11	53156	9/3/2014 3:19 PM
12	53178	9/2/2014 5:00 PM
13	53156	9/2/2014 4:56 PM
14	53538	9/2/2014 4:50 PM
15	53549	9/2/2014 4:38 PM
16	53094	9/2/2014 4:34 PM
17	53538	9/2/2014 4:30 PM
18	53098	9/2/2014 4:13 PM
19	53094	9/2/2014 4:09 PM
20	53549	9/2/2014 4:06 PM
21	53551	9/2/2014 4:02 PM
22	53551	9/2/2014 3:59 PM
23	53523	9/2/2014 3:58 PM
24	53553	9/2/2014 3:52 PM
25	53094	9/2/2014 3:49 PM
26	53538	9/2/2014 3:47 PM
27	53549	9/2/2014 3:44 PM
28	53551	9/2/2014 3:41 PM
29	53549	9/2/2014 3:38 PM
30	53549	9/2/2014 3:34 PM
31	53094	9/2/2014 3:25 PM
32	53538	9/2/2014 3:23 PM
33	53538	9/2/2014 3:18 PM
34	53538	9/2/2014 3:05 PM
35	53538	9/2/2014 2:52 PM
36	53038	9/2/2014 2:48 PM
37	53538	9/2/2014 2:46 PM
38	53038	9/2/2014 2:44 PM
39	53094	9/2/2014 2:37 PM
40	53538	9/2/2014 2:33 PM
41	53538	9/2/2014 2:31 PM
42	53538	9/2/2014 2:28 PM
43	53538	9/2/2014 2:28 PM
44	53538	9/2/2014 2:26 PM
45	53549	9/2/2014 2:25 PM
46	53094	9/2/2014 2:23 PM

47	53094	9/2/2014 2:20 PM
48	53549	9/2/2014 2:18 PM
49	53549	9/2/2014 2:15 PM
50	53549	9/2/2014 2:13 PM
51	53538	9/2/2014 2:11 PM
52	53094	9/2/2014 2:09 PM
53	53549	9/2/2014 2:07 PM
54	53538	9/2/2014 2:04 PM
55	53038	9/2/2014 2:02 PM
56	53038	9/2/2014 1:57 PM
57	53038	9/2/2014 1:54 PM
58	53551	9/2/2014 1:51 PM
59	53538	9/2/2014 1:41 PM
60	53094	9/2/2014 1:38 PM
61	53094	9/2/2014 1:34 PM
62	53098	9/2/2014 1:31 PM
63	53538	9/2/2014 1:30 PM
64	53538	9/2/2014 11:36 AM
65	53549	9/2/2014 11:34 AM
66	53549	9/2/2014 11:32 AM
67	53551	9/2/2014 11:31 AM
68	53094	9/2/2014 11:29 AM
69	53538	9/2/2014 11:27 AM
70	53094	9/2/2014 11:24 AM
71	53551	9/2/2014 11:22 AM
72	53538	9/2/2014 11:20 AM
73	53094	9/2/2014 11:17 AM
74	53551	9/2/2014 11:15 AM
75	53094	9/2/2014 10:58 AM
76	53549	9/2/2014 10:51 AM
77	53094	9/2/2014 10:49 AM
78	53523	9/2/2014 10:47 AM
79	53094	9/2/2014 10:45 AM
80	53190	9/2/2014 10:43 AM
81	53094	9/2/2014 10:39 AM
82	53549	9/2/2014 10:36 AM
83	53538	9/2/2014 10:34 AM
84	53549	9/2/2014 10:32 AM

85	53538	9/2/2014 10:30 AM
86	53538	9/2/2014 10:28 AM
87	53045	8/30/2014 12:30 PM
88	53038	8/29/2014 4:54 PM
89	53156	8/29/2014 4:40 PM
90	53551	8/29/2014 4:32 PM
91	53538	8/29/2014 4:28 PM
92	53551	8/29/2014 4:24 PM
93	53551	8/29/2014 4:11 PM
94	53038	8/29/2014 4:07 PM
95	53156	8/29/2014 2:56 PM
96	53538	8/29/2014 2:54 PM
97	53538	8/29/2014 2:52 PM
98	53094	8/29/2014 2:50 PM
99	53094	8/29/2014 2:47 PM
100	53538	8/29/2014 2:43 PM
101	53190	8/29/2014 2:41 PM
102	53094	8/29/2014 2:38 PM
103	53538	8/29/2014 2:33 PM
104	53538	8/29/2014 2:31 PM
105	53038	8/29/2014 2:28 PM
106	53549	8/29/2014 2:25 PM
107	53549	8/29/2014 2:21 PM
108	53066	8/29/2014 2:15 PM
109	53538	8/29/2014 2:02 PM
110	53549	8/29/2014 12:53 PM
111	53538	8/29/2014 12:17 PM
112	53549	8/29/2014 12:09 PM
113	53538	8/29/2014 12:04 PM
114	53549	8/29/2014 11:59 AM
115	53511	8/29/2014 11:55 AM
116	53094	8/29/2014 11:50 AM
117	53538	8/29/2014 11:45 AM
118	53538	8/29/2014 10:32 AM
119	53094	8/29/2014 10:28 AM
120	53551	8/29/2014 10:23 AM
121	53094	8/29/2014 10:21 AM
122	53549	8/29/2014 10:16 AM

123	53549	8/29/2014 10:03 AM
124	53538	8/29/2014 9:56 AM
125	53094	8/29/2014 9:25 AM
126	53066	8/29/2014 9:22 AM
127	53094	8/29/2014 9:17 AM
128	53538	8/29/2014 9:11 AM
129	53549	8/29/2014 9:06 AM
130	53189	8/29/2014 7:41 AM
131	53137	8/28/2014 4:59 PM
132	53094	8/28/2014 4:53 PM
133	53549	8/28/2014 4:48 PM
134	53538	8/28/2014 4:42 PM
135	53549	8/28/2014 4:40 PM
136	53594	8/28/2014 4:34 PM
137	53538	8/28/2014 4:29 PM
138	53094	8/28/2014 4:18 PM
139	53523	8/28/2014 4:14 PM
140	53094	8/28/2014 4:09 PM
141	53549	8/28/2014 4:04 PM
142	53094	8/28/2014 3:59 PM
143	53538	8/28/2014 3:46 PM
144	53538	8/28/2014 3:42 PM
145	53094	8/28/2014 3:25 PM
146	53549	8/28/2014 3:19 PM
147	53094	8/28/2014 3:10 PM
148	53538	8/28/2014 3:02 PM
149	53523	8/28/2014 2:55 PM
150	53038	8/28/2014 2:49 PM
151	53538	8/28/2014 2:40 PM
152	53012	8/27/2014 10:58 AM
153	53549	8/26/2014 4:13 PM
154	53188	8/26/2014 9:19 AM
155	53149	8/25/2014 10:57 PM
156	53189	8/25/2014 3:51 PM
157	53156	8/25/2014 3:36 PM
158	53066	8/23/2014 10:54 AM
159	53207	8/22/2014 5:25 PM
160	53038	8/22/2014 12:01 PM

161	53080	8/22/2014 10:21 AM
162	53188	8/22/2014 10:04 AM
163	53094	8/21/2014 9:14 PM
164	53080	8/21/2014 5:36 PM
165	53074	8/21/2014 4:28 PM
166	53012	8/21/2014 2:55 PM
167	53086	8/21/2014 12:03 PM
168	53183	8/21/2014 8:46 AM
169	53549	8/20/2014 5:09 PM
170	53189	8/20/2014 1:12 PM
171	53189	8/20/2014 12:33 PM
172	53186	8/20/2014 12:18 PM
173	53189	8/20/2014 9:41 AM
174	53188	8/20/2014 9:32 AM
175	53185	8/20/2014 9:04 AM
176	53523	8/20/2014 8:51 AM
177	53549	8/19/2014 10:00 PM
178	53188	8/19/2014 9:02 PM
179	53538	8/19/2014 8:31 PM
180	53066	8/19/2014 4:28 PM
181	53018	8/19/2014 2:21 PM
182	53523	8/19/2014 1:36 PM
183	53549	8/19/2014 12:19 PM
184	53538	8/19/2014 11:48 AM
185	53183	8/19/2014 10:39 AM
186	53094	8/19/2014 10:33 AM
187	53523	8/19/2014 10:21 AM
188	53094	8/19/2014 10:16 AM
189	53188	8/19/2014 10:09 AM
190	53212	8/19/2014 9:52 AM
191	53563	8/19/2014 9:13 AM
192	53186	8/19/2014 7:25 AM
193	53538	8/19/2014 12:29 AM
194	53095	8/18/2014 9:17 PM
195	53549	8/18/2014 6:40 PM
196	53551	8/18/2014 6:05 PM
197	53188	8/18/2014 5:31 PM
198	53538	8/18/2014 5:30 PM

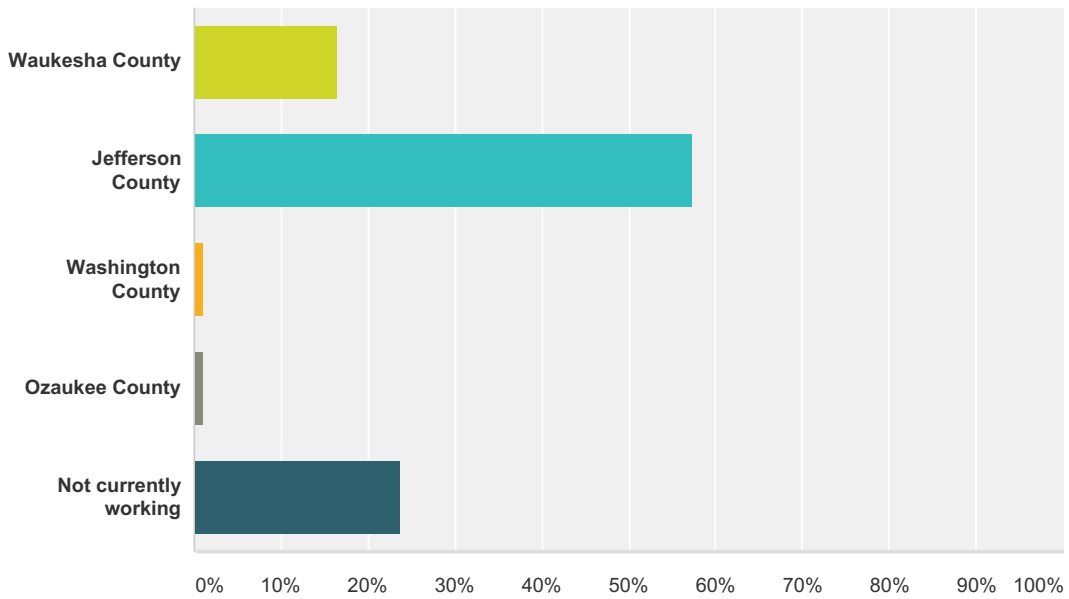
199	53038	8/18/2014 5:17 PM
200	53149	8/18/2014 5:09 PM
201	53549	8/18/2014 4:58 PM
202	53189	8/18/2014 4:54 PM
203	53186	8/18/2014 4:09 PM
204	53189	8/18/2014 4:03 PM
205	53538	8/18/2014 3:20 PM
206	53538	8/18/2014 2:20 PM
207	53188	8/18/2014 2:18 PM
208	53523	8/18/2014 1:31 PM
209	53538	8/18/2014 12:45 PM
210	53188	8/18/2014 12:19 PM
211	53538	8/18/2014 11:46 AM
212	53551	8/18/2014 11:07 AM
213	53551	8/18/2014 11:05 AM
214	53549	8/18/2014 10:59 AM
215	53549	8/18/2014 10:41 AM
216	53538	8/18/2014 10:34 AM
217	53538	8/18/2014 10:01 AM
218	53549	8/16/2014 7:08 AM
219	53188	8/15/2014 4:14 PM
220	53137	8/15/2014 2:32 PM
221	53538	8/15/2014 12:25 PM
222	53178	8/15/2014 12:14 PM
223	53038	8/15/2014 11:20 AM
224	53190	8/15/2014 10:51 AM
225	53188	8/14/2014 6:35 PM
226	53186	8/14/2014 10:27 AM
227	53558	8/13/2014 4:26 PM
228	53551	8/13/2014 1:10 PM
229	53538	8/13/2014 9:35 AM
230	53094	8/12/2014 4:48 PM
231	53072	8/12/2014 4:38 PM
232	53594	8/12/2014 2:25 PM
233	53538	8/12/2014 2:06 PM
234	53178	8/12/2014 1:36 PM
235	53066	8/12/2014 1:06 PM
236	53094	8/12/2014 1:04 PM

237	53190	8/12/2014 12:55 PM
238	53549	8/12/2014 11:59 AM
239	53549	8/12/2014 11:41 AM
240	53549	8/12/2014 11:38 AM
241	53594	8/12/2014 11:15 AM
242	53538	8/12/2014 10:54 AM
243	53549	8/12/2014 10:44 AM
244	53115	8/12/2014 10:22 AM
245	53094	8/12/2014 10:18 AM
246	53551	8/12/2014 9:52 AM
247	53098	8/12/2014 9:33 AM
248	53551	8/12/2014 9:31 AM
249	53549	8/12/2014 9:30 AM
250	53549	8/12/2014 9:28 AM
251	53549	8/12/2014 9:27 AM
252	53038	8/12/2014 9:21 AM
253	53548	8/12/2014 9:21 AM
254	53094	8/12/2014 9:19 AM
255	53551	8/12/2014 9:17 AM
256	53094	8/12/2014 8:07 AM
257	53127	8/11/2014 10:54 PM
258	53549	8/11/2014 9:17 PM
259	53051	8/11/2014 9:12 PM
260	53186	8/11/2014 5:39 PM
261	53186	8/11/2014 5:34 PM
262	53153	8/11/2014 5:30 PM
263	53549	8/11/2014 5:21 PM
264	53137	8/11/2014 5:20 PM
265	53118	8/11/2014 5:16 PM
266	53551	8/11/2014 5:15 PM
267	53188	8/11/2014 3:08 PM
268	53051	8/11/2014 1:01 PM
269	53150	8/11/2014 11:41 AM
270	53103	8/11/2014 9:14 AM
#	Country:	Date
	There are no responses.	
#	Email Address:	Date
	There are no responses.	

#	Phone Number:	Date
	There are no responses.	

Q2 Where do you work?

Answered: 272 Skipped: 27



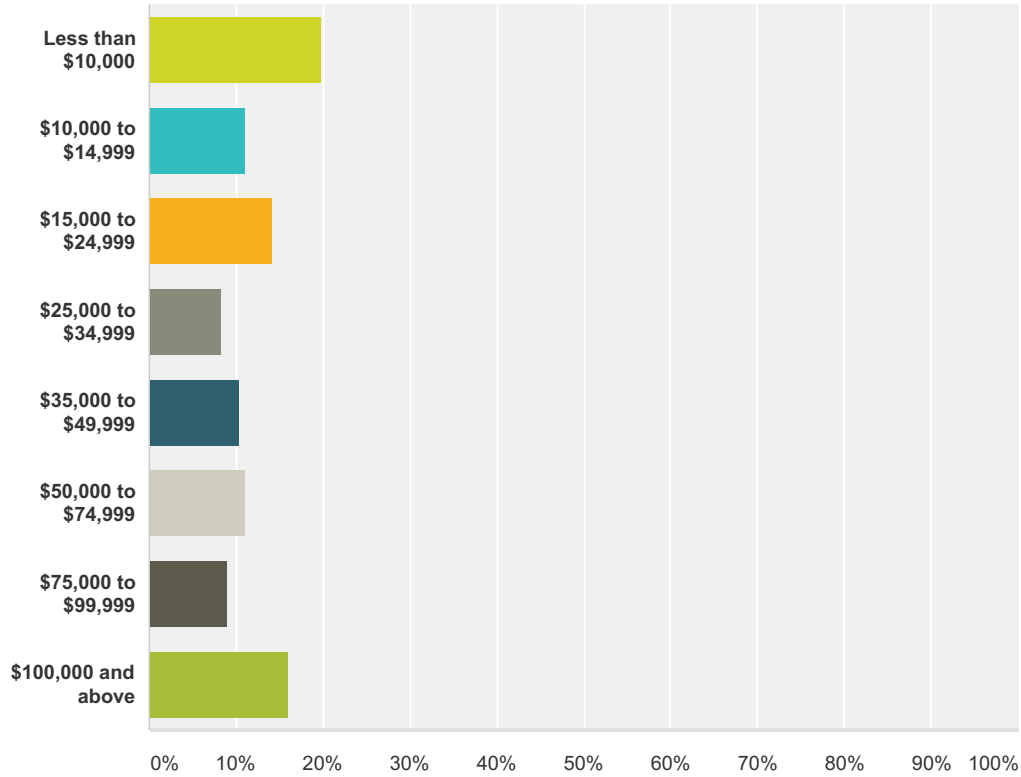
Answer Choices	Responses
Waukesha County	16.54% 45
Jefferson County	57.35% 156
Washington County	1.10% 3
Ozaukee County	1.10% 3
Not currently working	23.90% 65
Total	272

#	Somewhere else (please specify)	Date
1	Walworth County	9/2/2014 4:50 PM
2	Dane County	9/2/2014 4:02 PM
3	Deerfield, WI	9/2/2014 1:51 PM
4	Stay at home mom	8/29/2014 4:54 PM
5	Walworth County	8/29/2014 2:52 PM
6	Rock County	8/29/2014 11:55 AM
7	Dane County	8/28/2014 4:42 PM
8	Dane County	8/28/2014 2:40 PM
9	Milwaukee County	8/20/2014 9:32 AM
10	Milwaukee	8/19/2014 9:52 AM
11	Madison	8/18/2014 9:07 PM

12	Retired	8/18/2014 6:40 PM
13	Milwaukee County	8/18/2014 5:31 PM
14	Whitewater, Walworth Co.	8/18/2014 1:31 PM
15	Dane County	8/18/2014 11:07 AM
16	Dane County	8/13/2014 1:10 PM
17	retired	8/12/2014 2:25 PM
18	Milwaukee	8/12/2014 1:36 PM
19	retired	8/12/2014 12:55 PM
20	Walworth/Jefferson county (whitewater is in both)	8/12/2014 10:22 AM
21	Cambridge School District; both Dane & Jefferson Counties	8/12/2014 9:21 AM
22	Madison	8/12/2014 9:17 AM

Q3 Please SELECT the ONE income range that most accurately reflects your total household income.

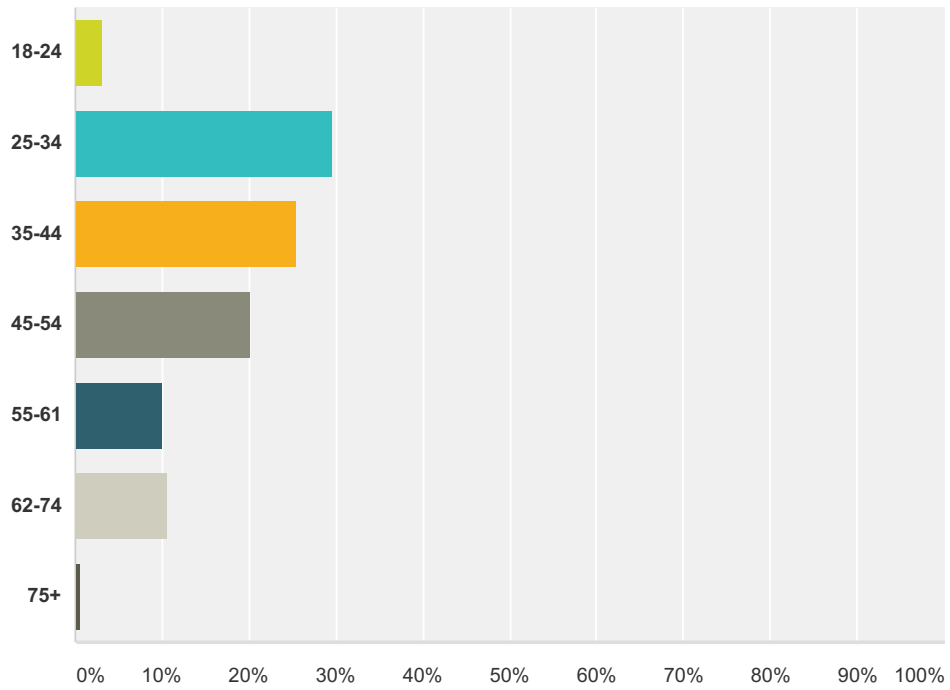
Answered: 288 Skipped: 11



Answer Choices	Responses
Less than \$10,000	19.79% 57
\$10,000 to \$14,999	11.11% 32
\$15,000 to \$24,999	14.24% 41
\$25,000 to \$34,999	8.33% 24
\$35,000 to \$49,999	10.42% 30
\$50,000 to \$74,999	11.11% 32
\$75,000 to \$99,999	9.03% 26
\$100,000 and above	15.97% 46
Total	288

Q4 Which is your age group?

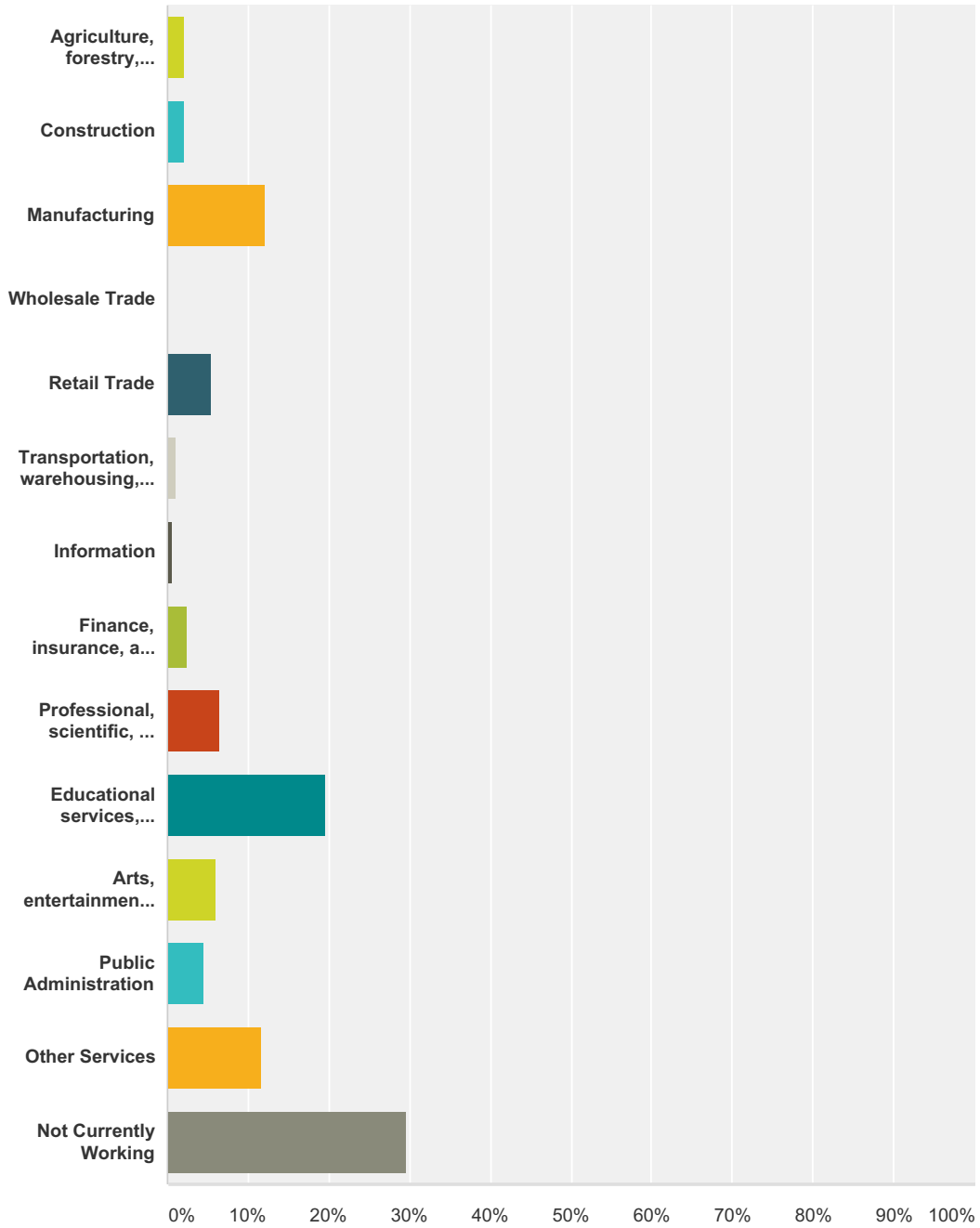
Answered: 290 Skipped: 9



Answer Choices	Responses
18-24	3.10% 9
25-34	29.66% 86
35-44	25.52% 74
45-54	20.34% 59
55-61	10.00% 29
62-74	10.69% 31
75+	0.69% 2
Total	290

Q5 In which field(s) are you employed?

Answered: 280 Skipped: 19



Answer Choices	Responses
Agriculture, forestry, fishing, hunting, and mining	2.14% 6
Construction	2.14% 6
Manufacturing	12.14% 34
Wholesale Trade	0.00% 0

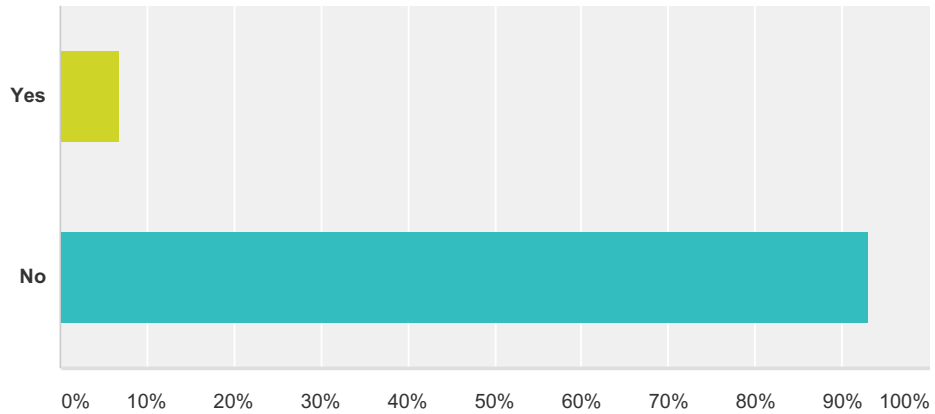
Retail Trade	5.36%	15
Transportation, warehousing, and utilities	1.07%	3
Information	0.71%	2
Finance, insurance, and real estate	2.50%	7
Professional, scientific, and management	6.43%	18
Educational services, health care, and social assistance	19.64%	55
Arts, entertainment, accommodation and food services	6.07%	17
Public Administration	4.64%	13
Other Services	11.79%	33
Not Currently Working	29.64%	83
Total Respondents: 280		

#	Other (please specify)	Date
1	Disabled	9/3/2014 4:17 PM
2	Factory Worker	9/2/2014 3:57 PM
3	School	9/2/2014 2:33 PM
4	Non profit religious	9/2/2014 1:42 PM
5	Retired	9/2/2014 10:36 AM
6	Not disabled	8/29/2014 4:08 PM
7	cashier	8/29/2014 2:50 PM
8	Disabled	8/29/2014 2:03 PM
9	Nursing	8/29/2014 11:46 AM
10	Retired Disabled Police Officer	8/29/2014 10:00 AM
11	Volunteer work	8/29/2014 9:59 AM
12	Student at Madison College	8/29/2014 9:34 AM
13	Caregiver	8/28/2014 3:42 PM
14	Non-profit	8/20/2014 1:13 PM
15	I am a coordinator of a meals on wheels program	8/20/2014 9:42 AM
16	retired	8/19/2014 8:32 PM
17	Manufacturer Representative	8/19/2014 12:21 PM
18	social worker whovolunteers for many organizations in community	8/19/2014 11:49 AM
19	Amimal boarding facility	8/18/2014 9:08 PM
20	Retired	8/18/2014 6:40 PM
21	Healthcare Marketing/Direct Mail/Printing	8/18/2014 11:08 AM
22	Media	8/15/2014 12:26 PM
23	non-profit	8/12/2014 4:49 PM
24	Religious Ministries	8/12/2014 1:04 PM

25	retired teacher	8/12/2014 12:56 PM
26	Human Services	8/12/2014 12:00 PM
27	Executive Director Chamber of Commerce	8/12/2014 11:42 AM
28	non profit	8/11/2014 5:17 PM

Q6 The U.S. Census Bureau considers the following to be "minority groups:" Black, Asian, Pacific Islander, or American Indian/Alaska Native. Are you a member of one of the groups listed above?

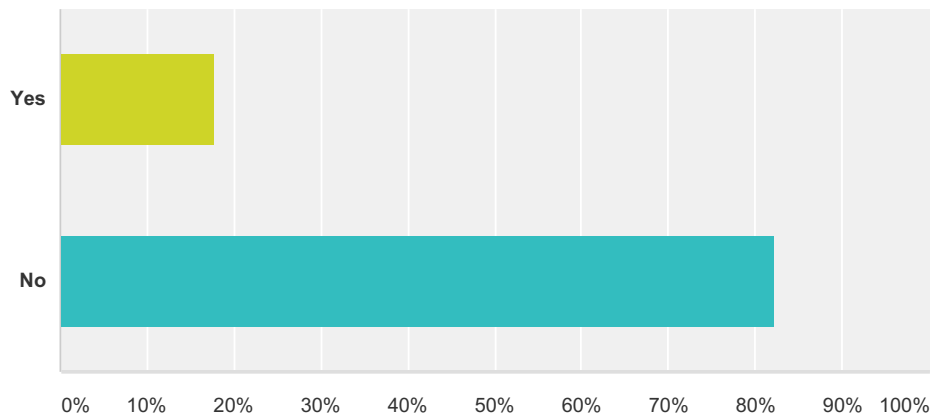
Answered: 288 Skipped: 11



Answer Choices	Responses
Yes	6.94% 20
No	93.06% 268
Total	288

Q7 Is a language other than English spoken regularly in your household?

Answered: 292 Skipped: 7

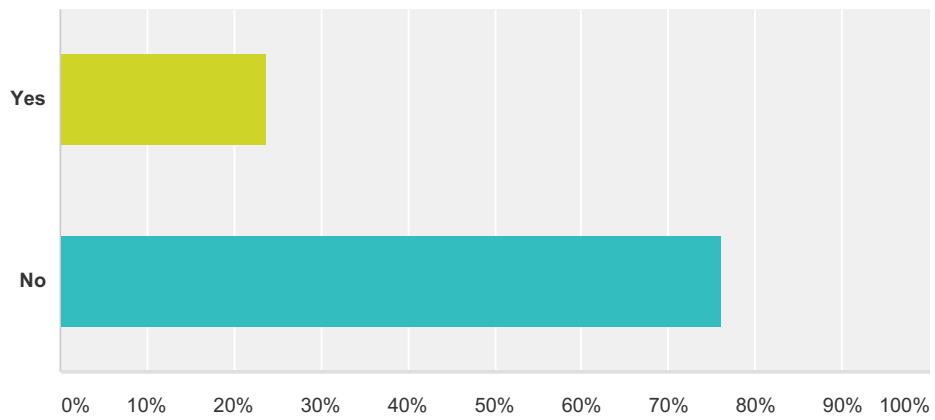


Answer Choices	Responses
Yes	17.81% 52
No	82.19% 240
Total	292

#	If yes, what language?	Date
1	Spanish	9/3/2014 4:12 PM
2	Spanish	9/3/2014 3:59 PM
3	Spanish	9/3/2014 3:54 PM
4	Spanish	9/2/2014 4:46 PM
5	Spanish	9/2/2014 4:38 PM
6	Spanish	9/2/2014 3:34 PM
7	Spanish	9/2/2014 2:52 PM
8	Spanish	9/2/2014 1:57 PM
9	Spanish	9/2/2014 1:38 PM
10	Spanish	8/29/2014 2:56 PM
11	Spanish	8/29/2014 2:29 PM
12	Spanish	8/29/2014 9:34 AM
13	Spanish	8/29/2014 9:18 AM
14	Spanish	8/29/2014 9:07 AM
15	Spanish	8/28/2014 4:14 PM
16	german	8/26/2014 4:14 PM
17	Italian	8/19/2014 9:53 AM
18	German	8/12/2014 9:17 AM

Q8 Does anyone in your household have a disability?

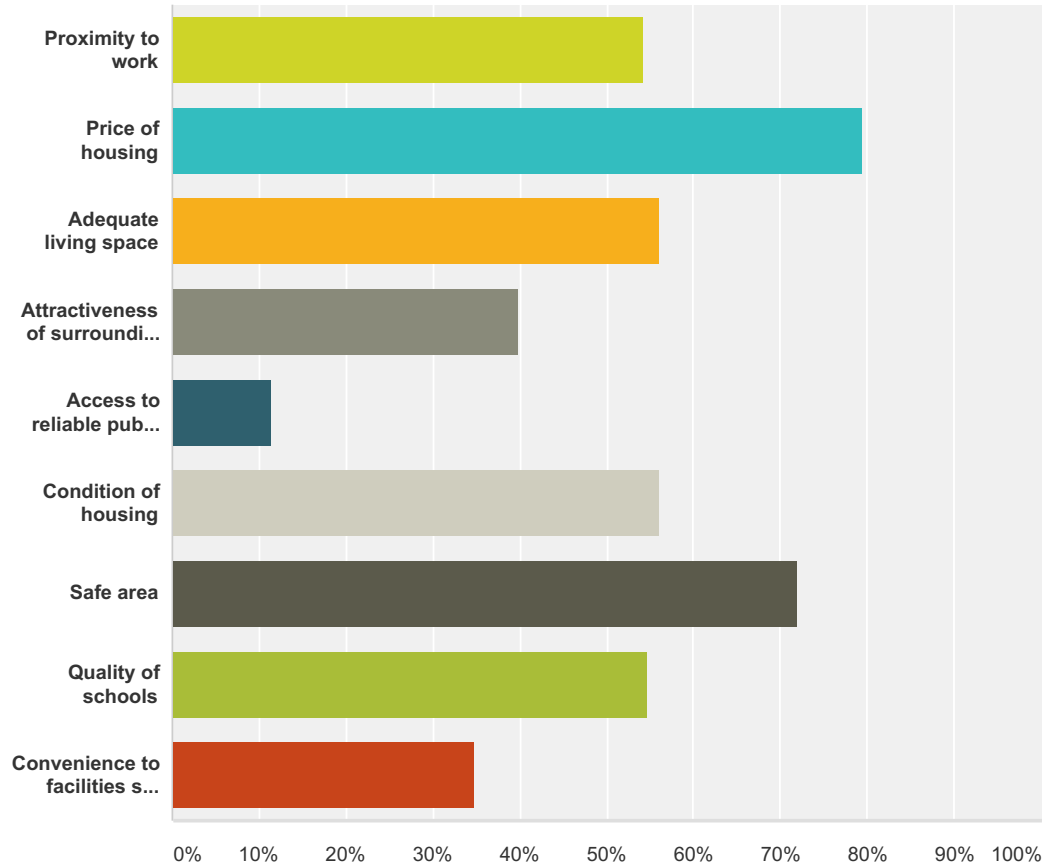
Answered: 291 Skipped: 8



Answer Choices	Responses
Yes	23.71% 69
No	76.29% 222
Total	291

Q9 Which of the following are important considerations to you in choosing a place to live? (SELECT ALL THAT APPLY)

Answered: 289 Skipped: 10

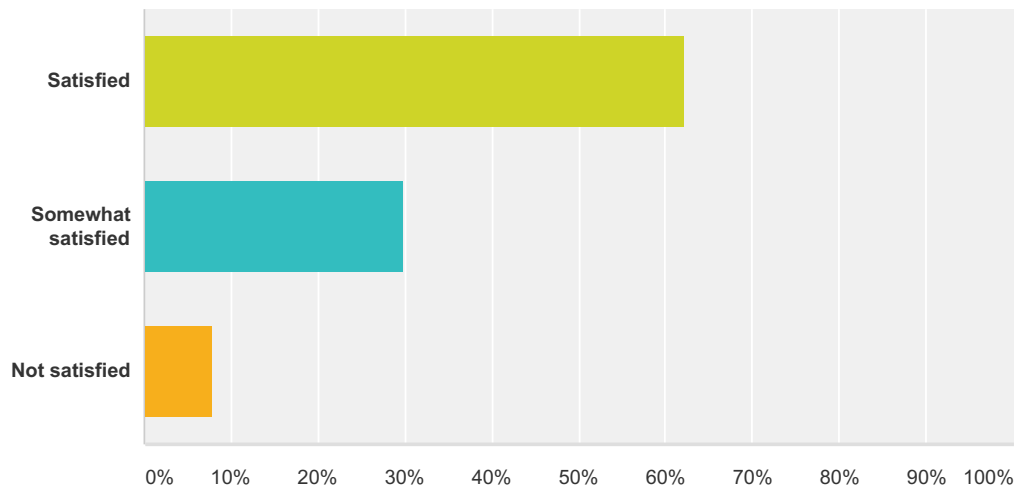


Answer Choices	Responses
Proximity to work	54.33% 157
Price of housing	79.58% 230
Adequate living space	56.06% 162
Attractiveness of surrounding area	39.79% 115
Access to reliable public transportation	11.42% 33
Condition of housing	56.06% 162
Safe area	71.97% 208
Quality of schools	54.67% 158
Convenience to facilities such as medical services and retail areas	34.95% 101
Total Respondents: 289	

#	Other (please specify)	Date
1	close to schools and parks	9/2/2014 10:59 AM
2	Cultural activities and arts opportunities.	8/18/2014 11:31 AM
3	emphasis on school quality	8/13/2014 4:27 PM
4	Access to arts/entertainment	8/12/2014 10:47 AM
5	Vibrant and Healthy Communities and Business Districts	8/12/2014 9:33 AM
6	traffic noise, age of neighbors, animals and corn due to allergies in the home	8/11/2014 5:27 PM

Q10 How satisfied are you with your current place to live?

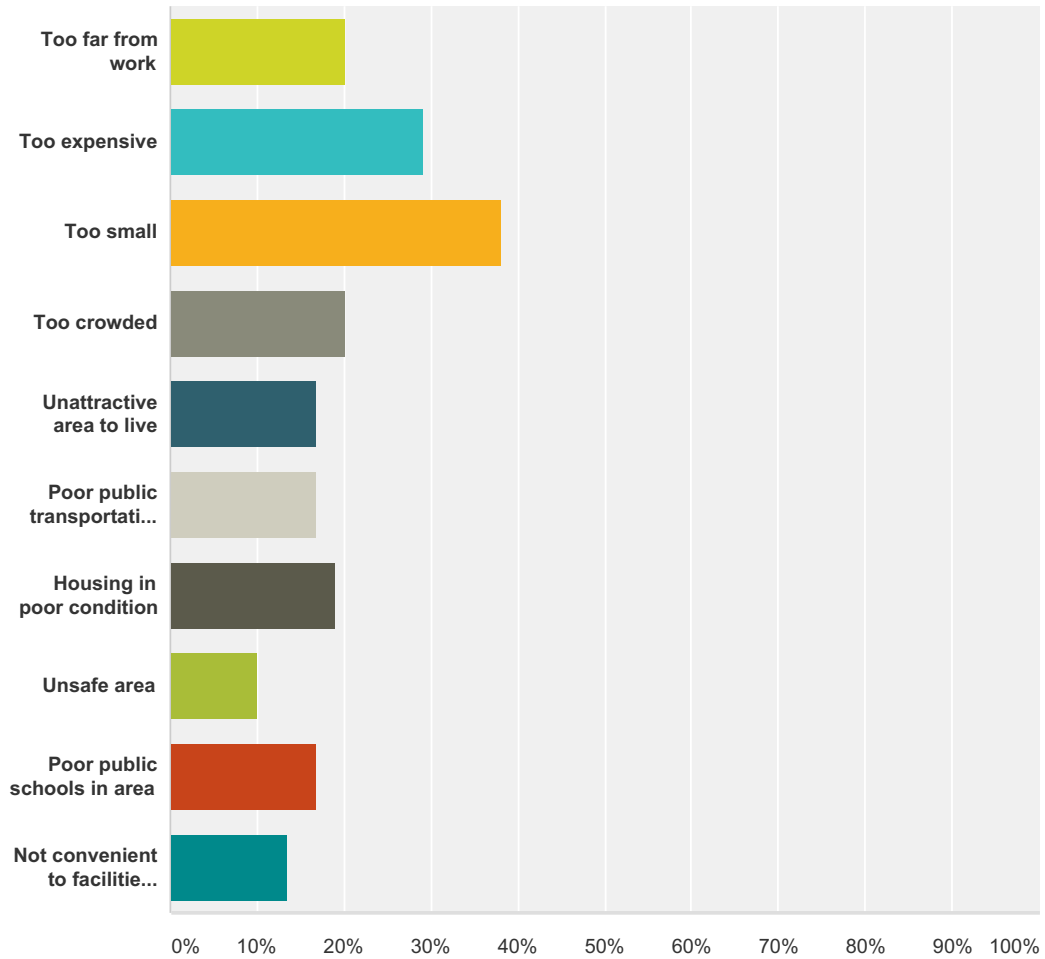
Answered: 289 Skipped: 10



Answer Choices	Responses
Satisfied	62.28% 180
Somewhat satisfied	29.76% 86
Not satisfied	7.96% 23
Total	289

Q11 If you are not satisfied with your current place to live, what are the reasons for your dissatisfaction? (SELECT ALL THAT APPLY)

Answered: 89 Skipped: 210



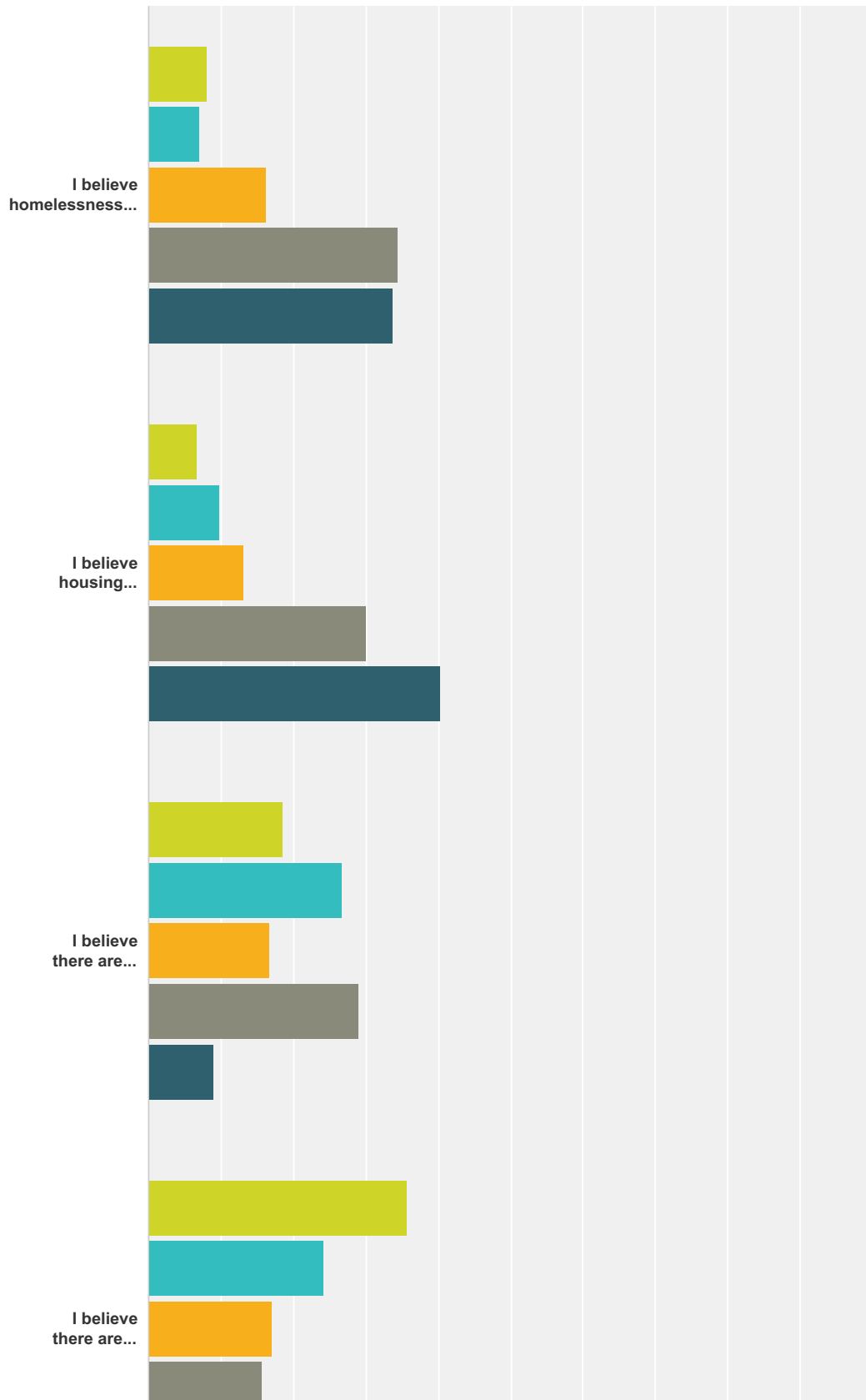
Answer Choices	Responses
Too far from work	20.22% 18
Too expensive	29.21% 26
Too small	38.20% 34
Too crowded	20.22% 18
Unattractive area to live	16.85% 15
Poor public transportation opportunities	16.85% 15
Housing in poor condition	19.10% 17
Unsafe area	10.11% 9

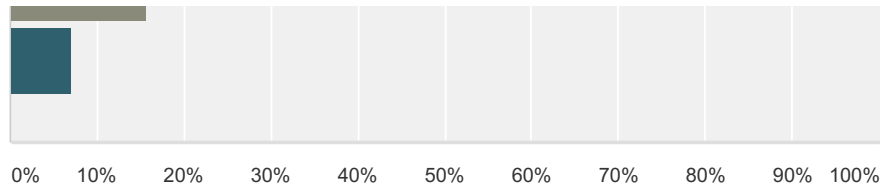
Poor public schools in area	16.85%	15
Not convenient to facilities such as medical services and retail areas	13.48%	12
Total Respondents: 89		

#	Other (please specify)	Date
1	Landlord is a slum lord	9/3/2014 3:49 PM
2	Homeless	9/2/2014 5:01 PM
3	Homeless; living with other people	9/2/2014 3:19 PM
4	low income- not necessarily safe	9/2/2014 10:59 AM
5	Traffic - mainly speed	8/22/2014 10:07 AM
6	local government & street traffic	8/19/2014 10:05 PM
7	too much home and yard maintenance for this stage of our lives	8/15/2014 11:45 PM

Q12 Please indicate your response to the following statements.

Answered: 283 Skipped: 16



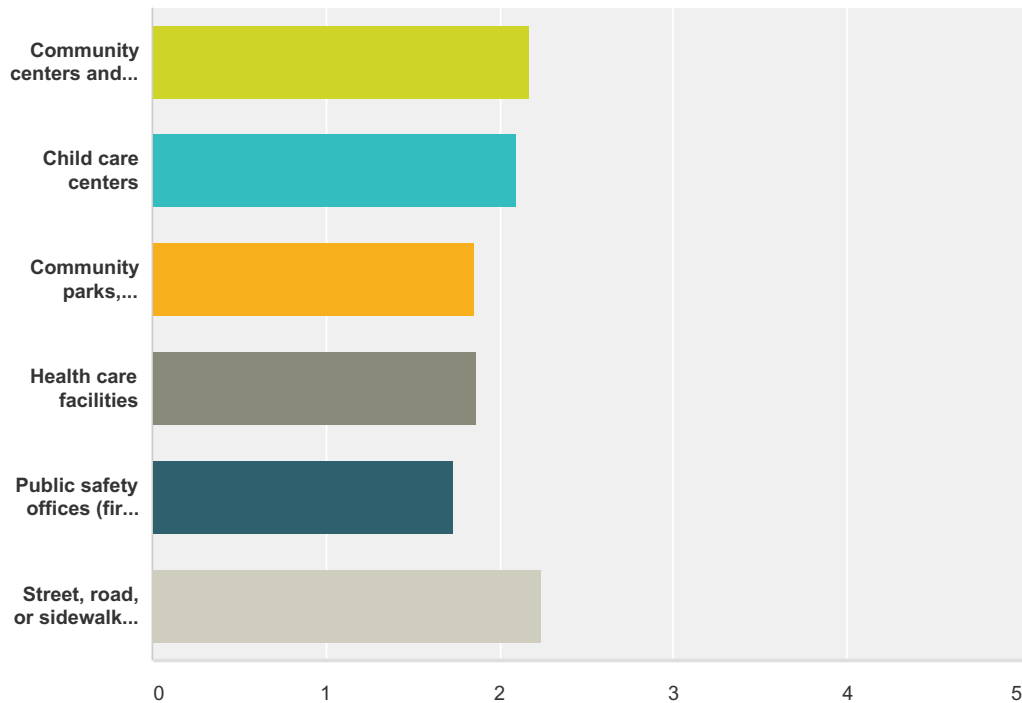


■ Strongly disagree
 ■ Somewhat disagree
 ■ Neither agree nor disagree
■ Somewhat agree
 ■ Strongly agree

	Strongly disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Strongly agree	Total
I believe homelessness is an issue in my county.	8.19% 23	7.12% 20	16.37% 46	34.52% 97	33.81% 95	281
I believe housing affordability is an issue in my county.	6.71% 19	9.89% 28	13.07% 37	30.04% 85	40.28% 114	283
I believe there are sufficient services for low and moderate income people in my county.	18.57% 52	26.79% 75	16.79% 47	28.93% 81	8.93% 25	280
I believe there are sufficient transportation options for low and moderate income people in my county.	35.71% 100	24.29% 68	17.14% 48	15.71% 44	7.14% 20	280

Q13 Please rank the following Public Facility Needs in your county on a scale ranging from a low need to a high need.

Answered: 282 Skipped: 17

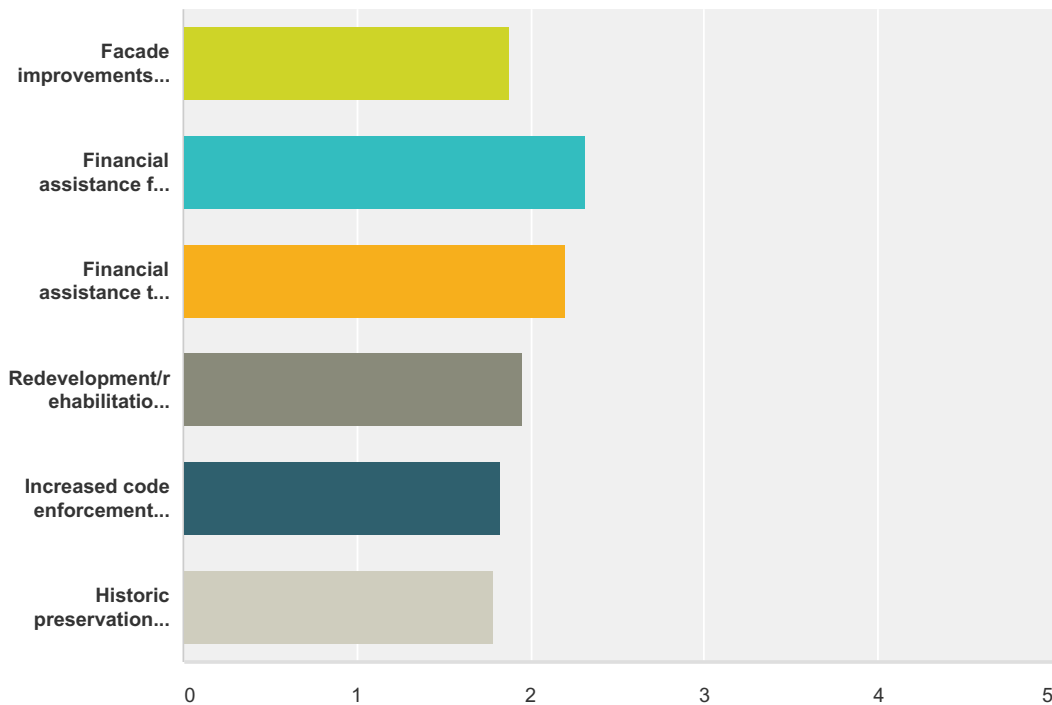


	Low Need	Moderate Need	High Need	Total	Average Rating
Community centers and facilities (i.e. youth centers, senior centers)	16.37% 46	50.18% 141	33.45% 94	281	2.17
Child care centers	21.01% 58	48.19% 133	30.80% 85	276	2.10
Community parks, recreational facilities, and cultural centers	36.36% 100	41.45% 114	22.18% 61	275	1.86
Health care facilities	36.46% 101	39.71% 110	23.83% 66	277	1.87
Public safety offices (fire, police, emergency management)	45.88% 128	35.48% 99	18.64% 52	279	1.73
Street, road, or sidewalk improvements	15.71% 44	44.64% 125	39.64% 111	280	2.24

#	Other Public Facility Needs (please specify)	Date
1	The YMCA is needed in Ozaukee County	8/21/2014 4:46 PM
2	Low income housing	8/19/2014 1:39 PM
3	Affordable senior housing	8/18/2014 6:44 PM
4	AN outside place for youth to hang out that is drug, alcohol & bully free. Does have to be sports related.	8/15/2014 10:55 AM

Q14 Please rank the following Economic/Community Development Needs in your county on a scale ranging from a low need to a high need.

Answered: 275 Skipped: 24



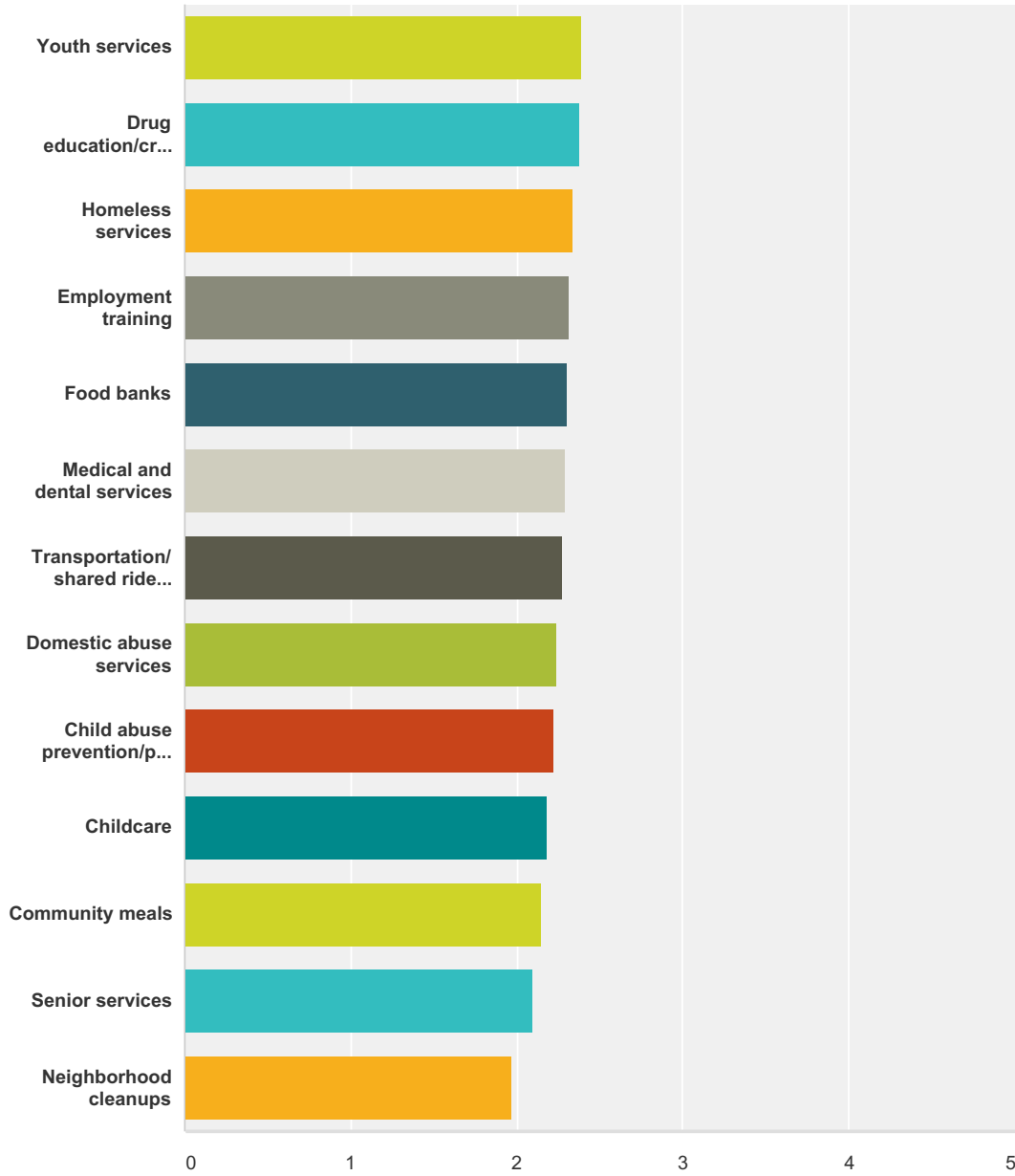
	Low Need	Moderate Need	High Need	Total	Average Rating
Facade improvements for businesses	30.51% 83	51.47% 140	18.01% 49	272	1.88
Financial assistance for community organizations	9.49% 26	48.54% 133	41.97% 115	274	2.32
Financial assistance to entrepreneurs and job creators	15.13% 41	49.45% 134	35.42% 96	271	2.20
Redevelopment/rehabilitation/demolition of blighted properties	29.56% 81	45.62% 125	24.82% 68	274	1.95
Increased code enforcement efforts	34.07% 92	48.89% 132	17.04% 46	270	1.83
Historic preservation efforts	35.45% 95	49.63% 133	14.93% 40	268	1.79

#	Other Economic/Community Development Needs (please specify)	Date
1	Places for people with additions to turn to in Watertown area. Really big issues there.	8/29/2014 9:53 AM
2	enforce miles and clean up - then wouldn't be so bad.	8/28/2014 3:52 PM
3	Services for adults with intellectual and developmental disabilities including inclusive continuing education, employment opportunities and financial assistance for non-profit service organizations.	8/21/2014 4:46 PM

4	Affordable housing units, especially efficiency apts & 2 bedroom family units. Jobs that pay a living wage.	8/19/2014 10:29 AM
5	More businesses/restaurants	8/18/2014 6:44 PM
6	leadreship, incentive, allignment and direction for organizations to work together for collective impact	8/14/2014 10:32 AM

Q15 Please rank the following Public Service Needs in your county on a scale ranging from a low need to a high need.

Answered: 277 Skipped: 22



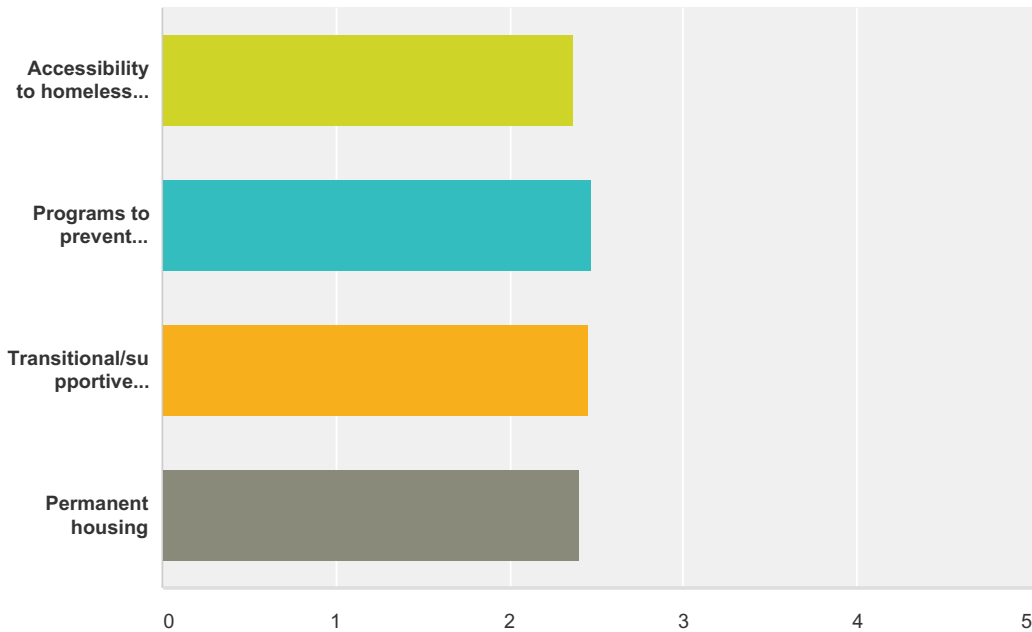
	Low Need	Moderate Need	High Need	Total	Average Rating
Youth services	8.33% 23	44.57% 123	47.10% 130	276	2.39
Drug education/crime prevention	12.82% 35	36.26% 99	50.92% 139	273	2.38
Homeless services	13.50% 37	39.05% 107	47.45% 130	274	2.34

Employment training	9.78% 27	48.55% 134	41.67% 115	276	2.32
Food banks	12.73% 35	43.64% 120	43.64% 120	275	2.31
Medical and dental services	13.14% 36	44.16% 121	42.70% 117	274	2.30
Transportation/shared ride taxis	14.55% 40	42.55% 117	42.91% 118	275	2.28
Domestic abuse services	13.60% 37	49.26% 134	37.13% 101	272	2.24
Child abuse prevention/parenting classes	16.48% 45	45.42% 124	38.10% 104	273	2.22
Childcare	18.18% 50	45.82% 126	36.00% 99	275	2.18
Community meals	15.52% 43	53.79% 149	30.69% 85	277	2.15
Senior services	18.61% 51	52.55% 144	28.83% 79	274	2.10
Neighborhood cleanups	28.57% 78	46.15% 126	25.27% 69	273	1.97

#	Other Public Service Needs (please specify)	Date
1	Especially dental services!	9/3/2014 5:11 PM
2	Very high need for dental services	9/3/2014 5:05 PM
3	Part-time childcare	9/2/2014 1:44 PM
4	D.A.R.E. Program for kids	8/28/2014 4:07 PM
5	ways to get community involved so there won't be any more "I didn't know that". Other states I have lived in, they had better "announcements" of information. Not just for those whom need it, but for others to offer help.	8/28/2014 3:52 PM
6	Eye care- low cost. Assistance with car repair. Affordable health insurance for those who are just above "Obama Care" cut-offs.	8/19/2014 10:29 AM
7	Suicide awareness, prevention, support services	8/18/2014 9:23 PM
8	drug and dental..is top of the list!	8/18/2014 11:04 AM
9	dental care	8/12/2014 12:03 PM
10	Domestic Violence Support for MEN	8/11/2014 3:12 PM

Q16 Please rank the following Homeless Needs in your county on a scale ranging from a low need to a high need.

Answered: 279 Skipped: 20

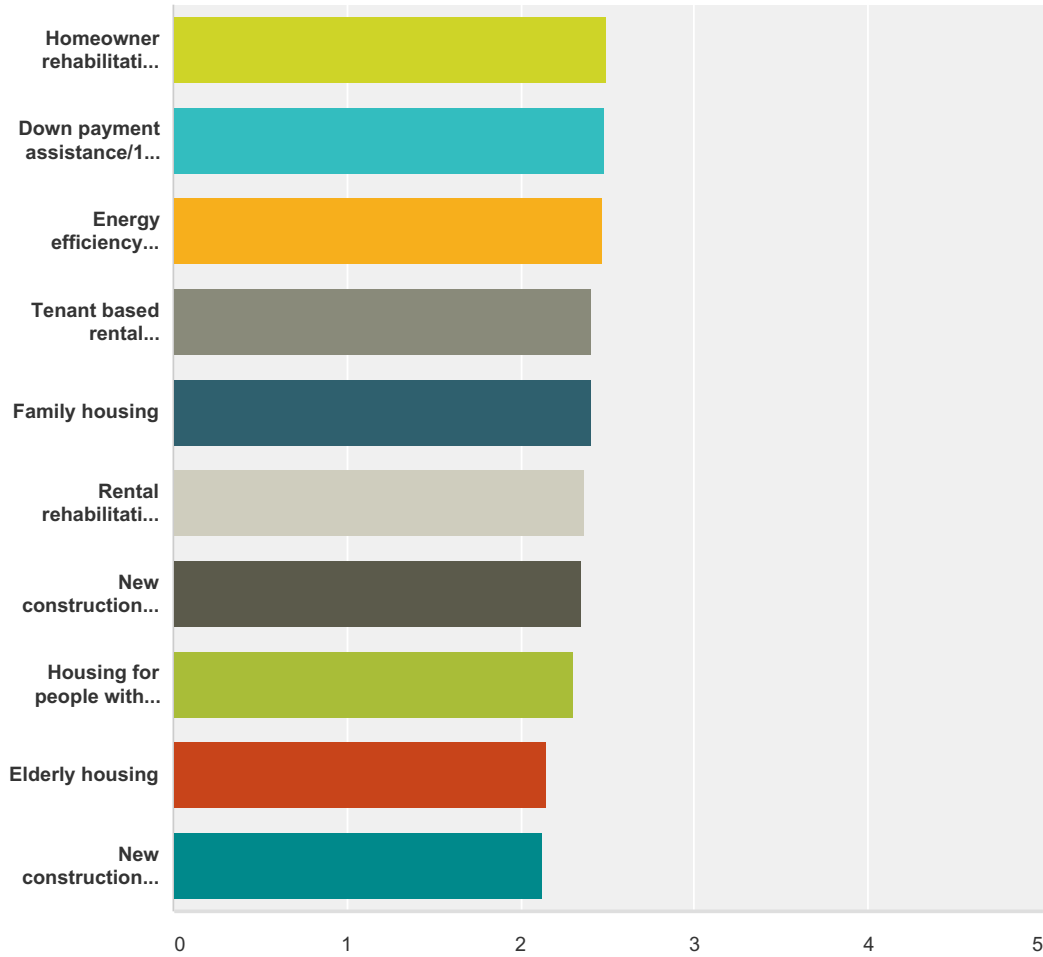


	Low Need	Moderate Need	High Need	Total	Average Rating
Accessibility to homeless shelters	11.83% 33	39.43% 110	48.75% 136	279	2.37
Programs to prevent homelessness	9.78% 27	33.33% 92	56.88% 157	276	2.47
Transitional/supportive housing programs	8.00% 22	39.27% 108	52.73% 145	275	2.45
Permanent housing	11.59% 32	36.96% 102	51.45% 142	276	2.40

#	Other Homeless Needs (please specify)	Date
1	Transitional needs to be longer than 30 days	8/29/2014 2:06 PM
2	jobs available	8/18/2014 5:14 PM
3	Jobs, transportation, affordable housing, fewer tickets being issued by WPD which they cannot pay for	8/11/2014 3:13 PM

Q17 Please rank the following Housing Needs in your county on a scale ranging from a low need to a high need.

Answered: 276 Skipped: 23



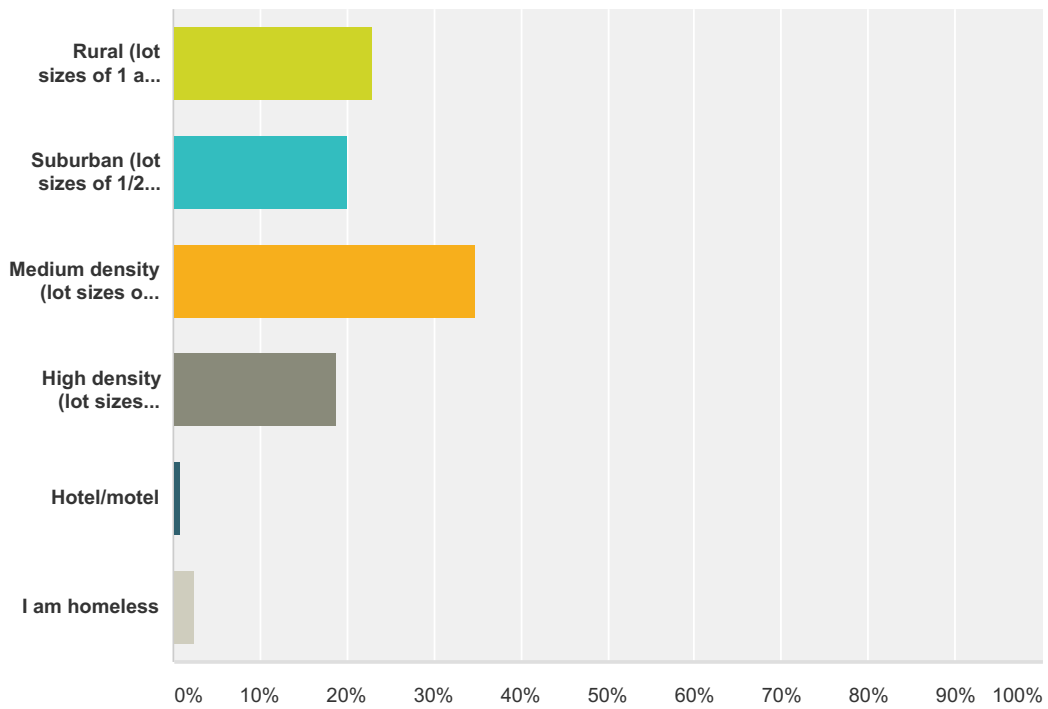
	Low Need	Moderate Need	High Need	Total	Average Rating
Homeowner rehabilitation grants/loans	6.52% 18	37.68% 104	55.80% 154	276	2.49
Down payment assistance/1st time homebuyer program	7.27% 20	37.82% 104	54.91% 151	275	2.48
Energy efficiency improvements to current housing	8.36% 23	36.00% 99	55.64% 153	275	2.47
Tenant based rental assistance	11.03% 30	37.13% 101	51.84% 141	272	2.41
Family housing	9.19% 25	40.81% 111	50.00% 136	272	2.41
Rental rehabilitation grants/loans	11.36% 31	39.93% 109	48.72% 133	273	2.37

New construction of affordable rental units	16.18% 44	33.09% 90	50.74% 138	272	2.35
Housing for people with disabilities	13.60% 37	41.54% 113	44.85% 122	272	2.31
Elderly housing	18.45% 50	47.60% 129	33.95% 92	271	2.15
New construction of housing for homeownership	23.13% 62	40.67% 109	36.19% 97	268	2.13

#	Other Housing Needs (please specify)	Date
1	Much So!	8/29/2014 9:54 AM
2	Assistance for those who are low income, not disabled or elderly	8/18/2014 2:28 PM

Q18 Please select the residential category that best describes where you live.

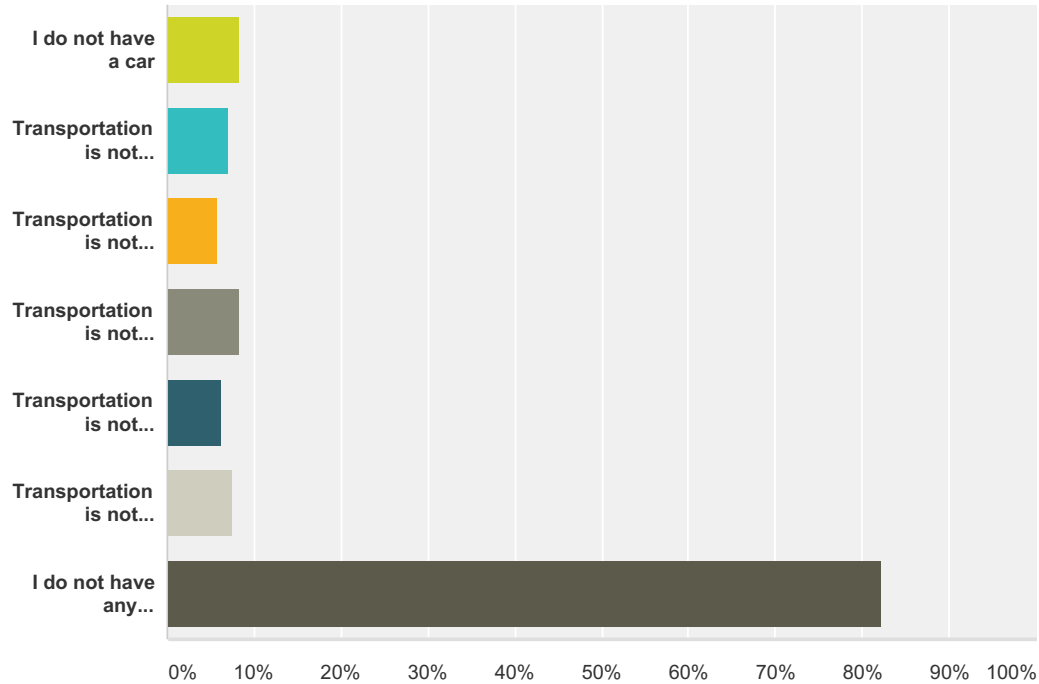
Answered: 270 Skipped: 29



Answer Choices	Responses	
Rural (lot sizes of 1 acre or larger)	22.96%	62
Suburban (lot sizes of 1/2 acre to less than 1 acre)	20.00%	54
Medium density (lot sizes of 1/4 acre to less than 1/2 acre)	34.81%	94
High density (lot sizes under 1/4 acre or multifamily with 4 units or more per building)	18.89%	51
Hotel/motel	0.74%	2
I am homeless	2.59%	7
Total		270

Q19 Please indicate any challenges that you may have related to transportation. (CHECK ALL THAT APPLY)

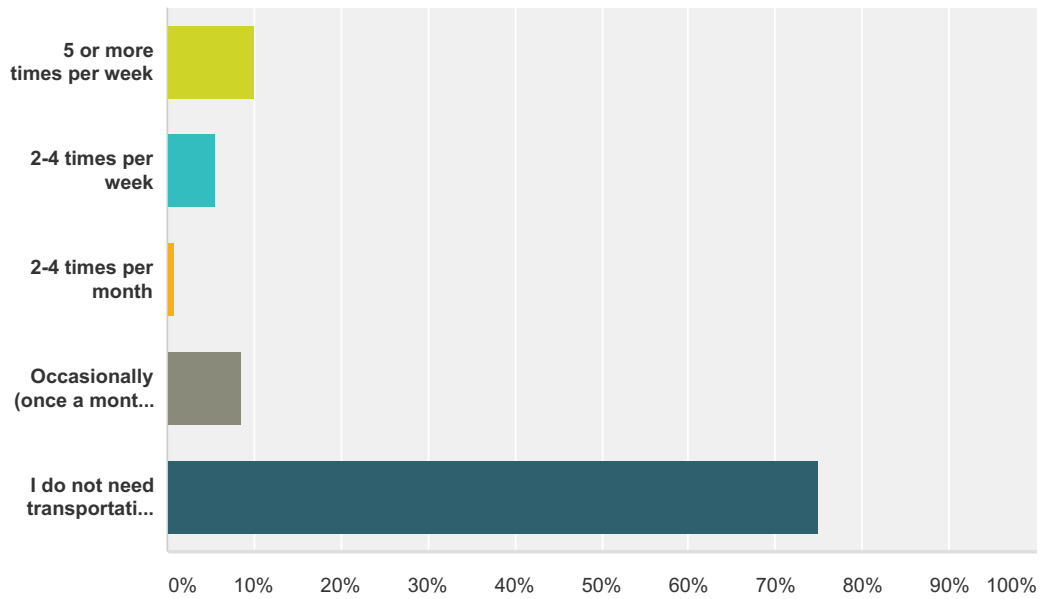
Answered: 253 Skipped: 46



Answer Choices	Responses
I do not have a car	8.30% 21
Transportation is not available from my home to my work	7.11% 18
Transportation is not available from my home to my medical services	5.93% 15
Transportation is not available to the public services I need	8.30% 21
Transportation is not available on weekends (Friday evening to Sunday)	6.32% 16
Transportation is not available weekdays after 5 pm	7.51% 19
I do not have any transportation challenges	82.21% 208
Total Respondents: 253	

Q20 Please check the frequency that you need transportation assistance. Count a round trip as one instance of assistance.

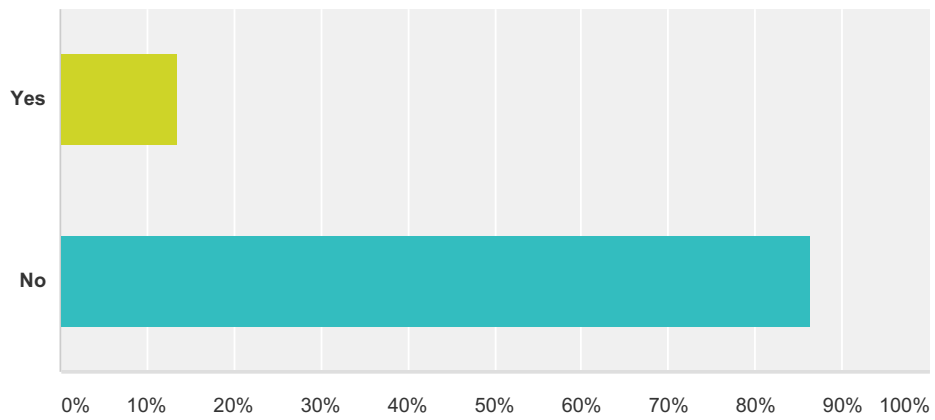
Answered: 268 Skipped: 31



Answer Choices	Responses
5 or more times per week	10.07% 27
2-4 times per week	5.60% 15
2-4 times per month	0.75% 2
Occasionally (once a month or less)	8.58% 23
I do not need transportation assistance	75.00% 201
Total	268

Q21 Since living in your county have you experienced housing discrimination?

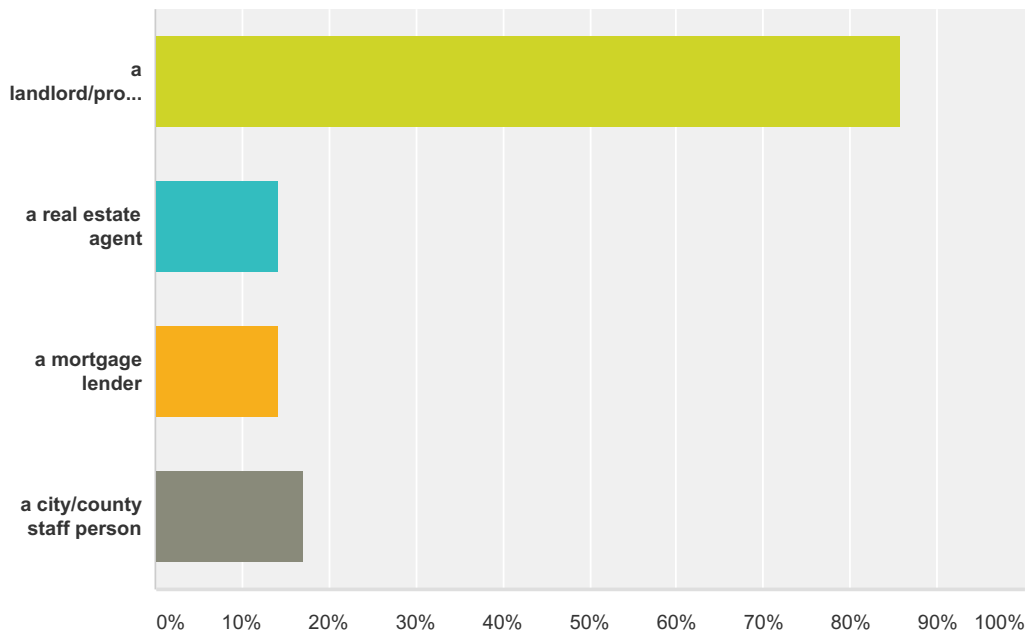
Answered: 278 Skipped: 21



Answer Choices	Responses
Yes	13.67% 38
No	86.33% 240
Total	278

Q22 Who discriminated against you? (CHECK ALL THAT APPLY)

Answered: 35 Skipped: 264

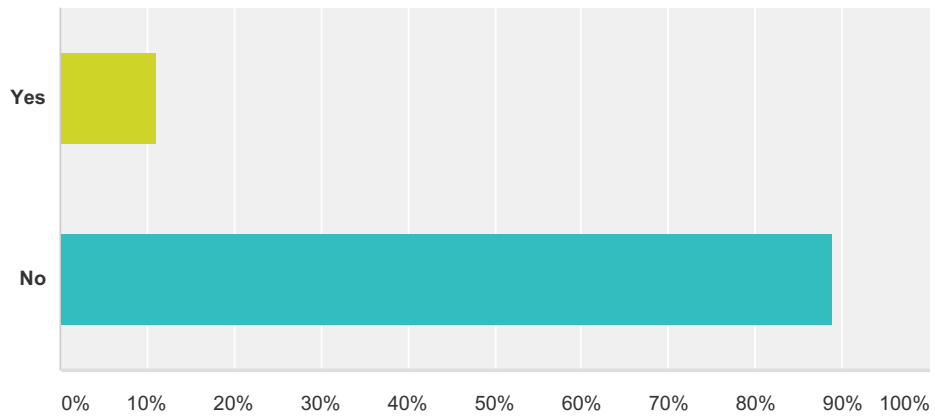


Answer Choices	Responses
a landlord/property manager	85.71% 30
a real estate agent	14.29% 5
a mortgage lender	14.29% 5
a city/county staff person	17.14% 6
Total Respondents: 35	

#	Other (please specify)	Date
1	Because of Past History	8/29/2014 9:55 AM
2	Not against me	8/20/2014 5:13 PM
3	Builder/Contractor	8/12/2014 9:38 AM

Q23 Based on your response reporting that you have experienced discrimination, did you file a report of that discrimination?

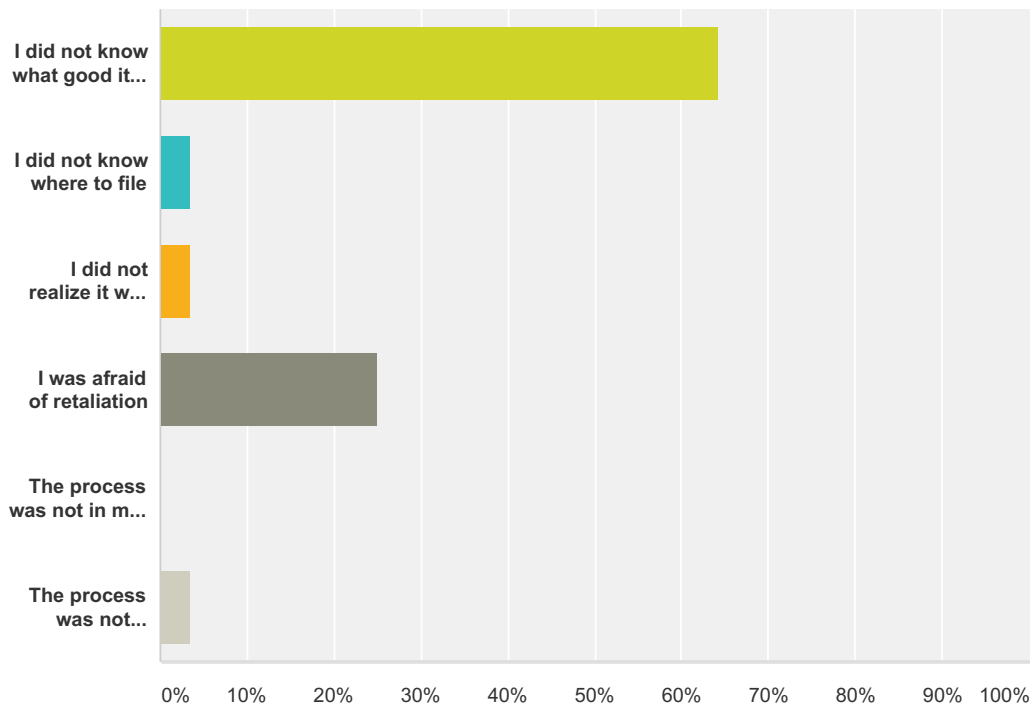
Answered: 36 Skipped: 263



Answer Choices	Responses	
Yes	11.11%	4
No	88.89%	32
Total		36

Q24 If you did not file a report, why didn't you file? (SELECT ONLY ONE)

Answered: 28 Skipped: 271

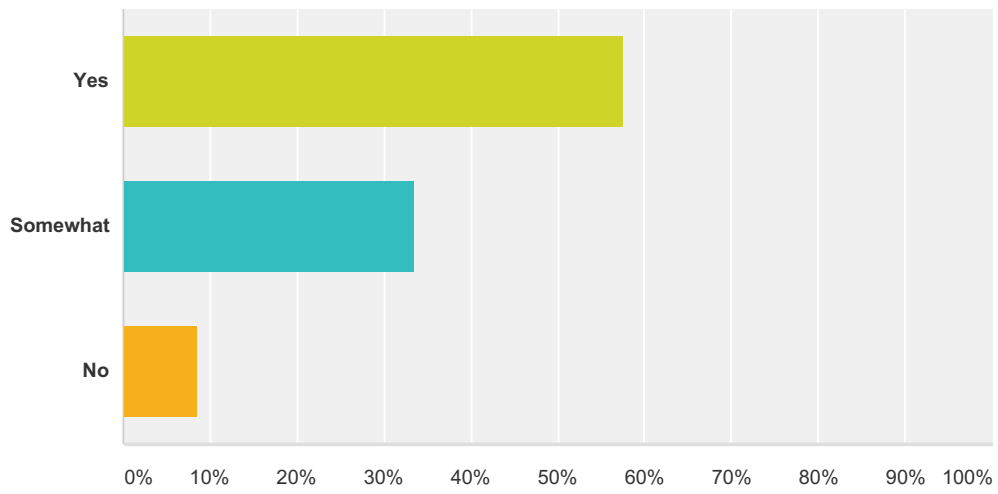


Answer Choices	Responses
I did not know what good it would do	64.29% 18
I did not know where to file	3.57% 1
I did not realize it was a violation of the law	3.57% 1
I was afraid of retaliation	25.00% 7
The process was not in my native language	0.00% 0
The process was not accessible to me because of a disability	3.57% 1
Total	28

#	Other (please specify)	Date
1	I can't afford a lawyer	9/3/2014 5:13 PM
2	They will deny it	9/2/2014 11:30 AM
3	It was subtle enough that there was nothing I could point to as concrete evidence of the discrimination.	8/19/2014 9:06 PM

Q25 Do you understand your fair housing rights?

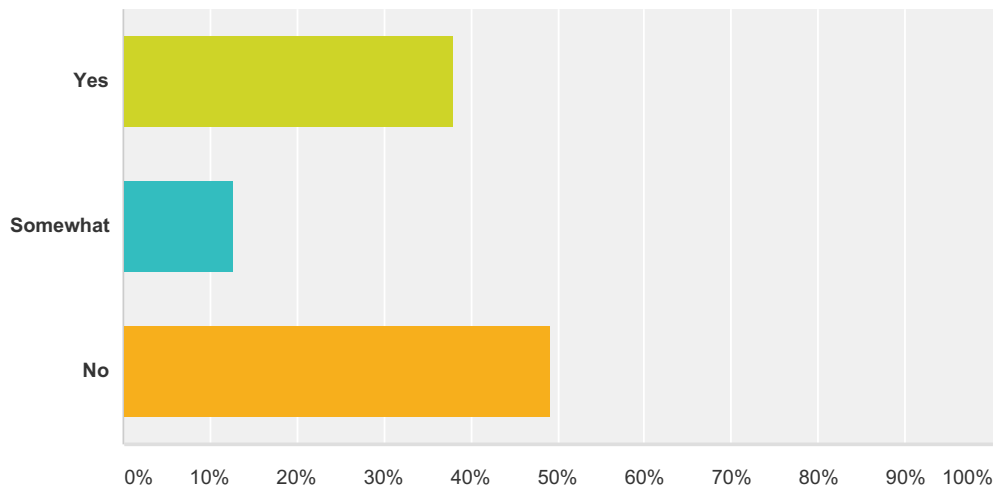
Answered: 267 Skipped: 32



Answer Choices	Responses
Yes	57.68% 154
Somewhat	33.71% 90
No	8.61% 23
Total	267

Q26 Do you know where to file a housing discrimination complaint?

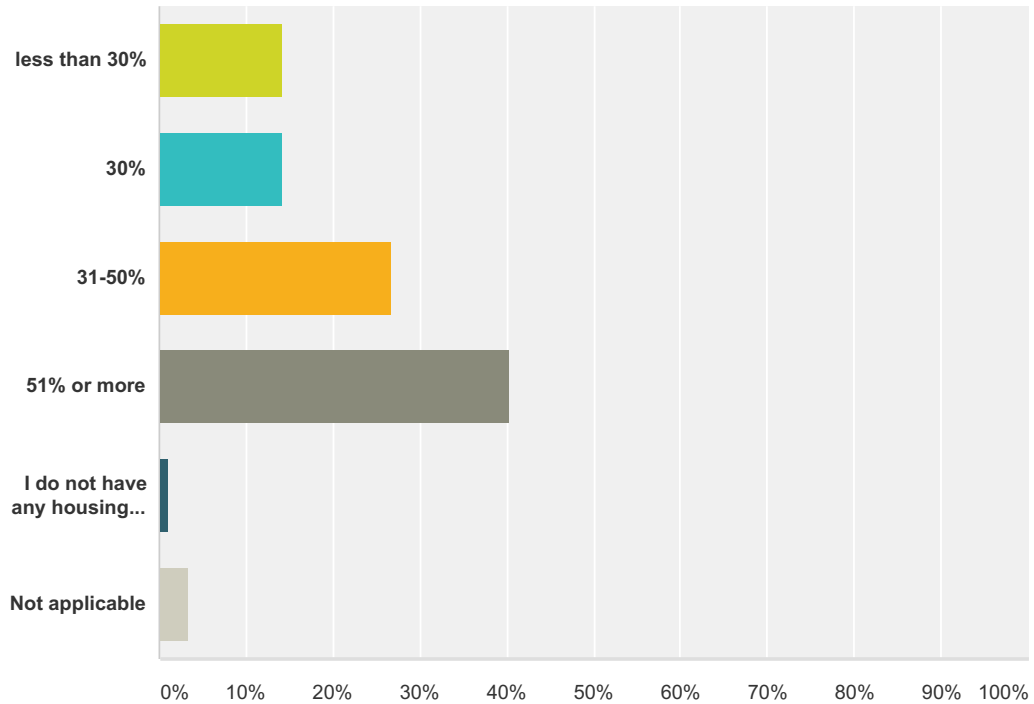
Answered: 268 Skipped: 31



Answer Choices	Responses
Yes	38.06% 102
Somewhat	12.69% 34
No	49.25% 132
Total	268

Q27 What percentage of your monthly income is used for housing expenses (include rent or mortgage, taxes, insurance, and utility payments) ?

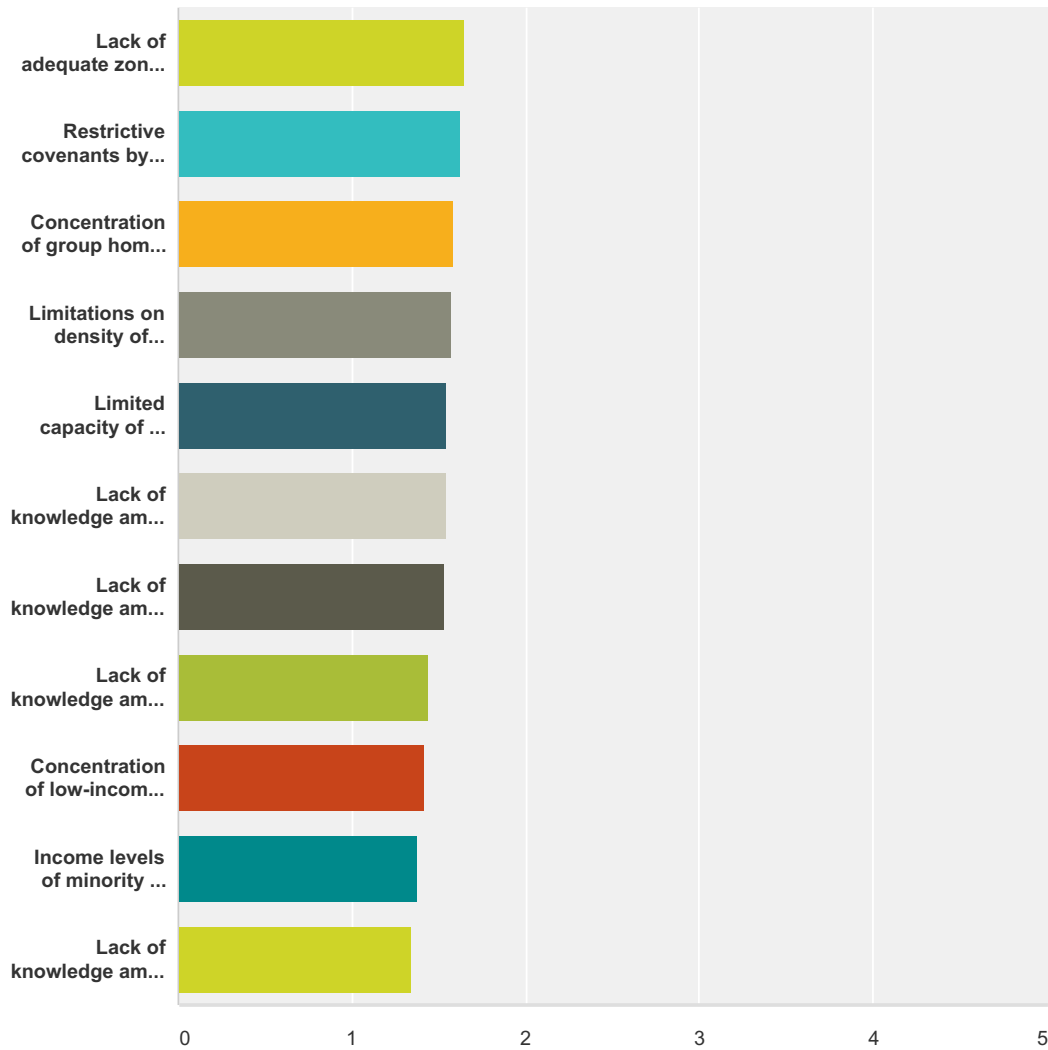
Answered: 266 Skipped: 33



Answer Choices	Responses
less than 30%	14.29% 38
30%	14.29% 38
31-50%	26.69% 71
51% or more	40.23% 107
I do not have any housing costs	1.13% 3
Not applicable	3.38% 9
Total	266

Q28 Please select whether any of the following are barriers to Fair Housing within your county.

Answered: 245 Skipped: 54



	Barrier	Not a Barrier	Total	Average Rating
Lack of adequate zoning for manufactured housing	35.09% 80	64.91% 148	228	1.65
Restrictive covenants by homeowner associations or neighborhood organizations	36.75% 86	63.25% 148	234	1.63
Concentration of group homes in certain neighborhoods	41.28% 97	58.72% 138	235	1.59
Limitations on density of housing	42.06% 98	57.94% 135	233	1.58
Limited capacity of a local organization devoted to fair housing investigation/testing	45.26% 105	54.74% 127	232	1.55

Lack of knowledge among real estate agents regarding fair housing	44.83% 104	55.17% 128	232	1.55
Lack of knowledge among bankers/lenders regarding fair housing	46.52% 107	53.48% 123	230	1.53
Lack of knowledge among large landlords/property managers regarding fair housing	56.41% 132	43.59% 102	234	1.44
Concentration of low-income housing in certain areas	57.74% 138	42.26% 101	239	1.42
Income levels of minority and female-headed households	62.29% 147	37.71% 89	236	1.38
Lack of knowledge among residents regarding fair housing	64.56% 153	35.44% 84	237	1.35

#	Other (please specify)	Date
1	Landlords are not held accountable for the condition of their properties. Our Landlord will not fix things that needs fixing. We have mold problems. In the winter we have walls with ice on them. Our electric bill is over \$200 a month and we live in a small 3 bedroom upper. Our roof leaks.	9/3/2014 3:53 PM
2	I don't really have an adequate knowledge of the housing availability since I have a home and am not looking for housing	8/29/2014 7:50 AM
3	Tried to express above: resistance to 'block' housing for low income residents by city officials. Seen as invitation for druggies & 'lazy' folk - will blight the area & cause trouble & bring down property values.	8/19/2014 10:38 AM
4	Don't know	8/18/2014 3:33 PM
5	Not sure what barriers are there.	8/12/2014 9:33 AM

Q29 Please use the box below to provide any additional information regarding local housing and community development needs.

Answered: 37 Skipped: 262

#	Responses	Date
1	I lived in low income housing but was kicked out after missing a bill. I tried to fight this in court but had to drop the case until I can afford a lawyer.	9/3/2014 5:23 PM
2	Low income housing providers need to be more understanding. People you go to for help treat you horrible.	9/3/2014 5:09 PM
3	Need more info in newspaper or other type of method announcing on rental places. Hard to find out where places are for rent out of Jefferson County and sold homes.	9/3/2014 4:16 PM
4	Hold Landlords responsible for their properties.	9/3/2014 3:54 PM
5	Disabilities Aid	9/3/2014 3:48 PM
6	I believe the Section 8 program is being abused and the people in NEED can't utilize.	9/3/2014 3:32 PM
7	It was hard to separate village from county. County may offer things, but village may not.	9/3/2014 3:23 PM
8	I am in need of housing and I am finding to receive assistance. I am on SSDI and I am a single mom of 2.	9/2/2014 5:13 PM
9	More help with food, paying bills, help people with disability find a job do to a injury or illness.	9/2/2014 4:19 PM
10	Need help with rent and utilities	9/2/2014 2:55 PM
11	Need more help with rent. Need more low-icome	9/2/2014 2:18 PM
12	Need more local housing for men and women. There's houses for women, but guess what God made men and women. Men could use help too!	9/2/2014 11:26 AM
13	We are fortunate. Some of our friends and relatives have had financial difficulties and their options are limited without family support. They are not poor enough, and yet would be quickly without family support and guidance. These are the people who have the potential to be homeless and fall into that hole.	8/30/2014 12:43 PM
14	My children are 7 and 8 years of age 1/4 block out of bussing to school. We (me and wife) work 2 to 10 but are told my kids can walk even to learn it (the way there with the 6 turns I believe that is a crazy thing a cab for two small children and all the others in our vicinity. Kids are our future but parents are having a hard time giving them one because of obstacles such as this one.	8/29/2014 4:22 PM
15	Support for the Women's Center and their outreach programs. More district attorneys to prosecute DV and drug cases. Schools using classical curriculums. School class sizes need to be smaller.	8/29/2014 2:23 PM
16	A lot of the low income housing really are to strict in deciding who can live in their apartments! People who have had problems in the past because of others who previously lived with them at other apts - This person can't get an apt even if the problem people are not with them.	8/29/2014 12:17 PM
17	Lower the income	8/29/2014 9:17 AM
18	I am fortunate to have a home and a job. but am still struggling to make ends meet. I am somewhat aware of community programs through volunteer work with several Waukesha programs. one program I have had experience with on a personal level is the free after school Waukesha Community Art Project for my daughter. I am so pleased that it is available and has provided much more to the kids than art instruction.	8/29/2014 7:54 AM
19	There need to be more programs that help men out. Men can be single fathers also, and even if not on paper. have their children more than the females getting the assistance. Also more help for middle class for a certain period. There are allot out there for low income, but none to help out in the interum of not being able to pay bills. Look into and do more checks on fradulence of assistance. Allot of ppl don't look for work, use drugs/sell drugs. They make more \$ and go on vacations & buy new cars, clothes, jewelry, and I am selling things in order to pay my electric on time.	8/28/2014 3:58 PM

20	There seems to be a need for more than just "adequate low-income" housing. There also needs to be rental units that fit those who do not fit the requirements of low income housing by being over a minimal amount, and rentals that those way above that level can afford. Or, they need to raise the income level requirements to fit todays cost of living.	8/22/2014 12:09 PM
21	Stop this effort to spend more taxpayer money and ruin our county! This survey is a Communist oriented pile of crap.	8/21/2014 9:22 PM
22	Disability is the largest and only minority that anyone can join at any time. We need to be concerned about the needs and resources for people with disabilities and their families living in our community.	8/21/2014 4:53 PM
23	The need for rental assistance and affordable housing for disabled/handicap residents.	8/21/2014 12:21 PM
24	Jefferson housing has still not recovered from the flood of 2008; appraisal values sank, putting even the high and dry upside down in their mortgages. The large companies in the heart of the city offer jobs, but also bring constant semi traffic, noise and some god awful smells. At least Purina is a major contributor to the new humane society project, which is sorely needed. On a related note, I'd like to see more pet-friendly senior housing options.	8/19/2014 10:44 PM
25	I feel many people need low income housing but also need to learn to care for their housing so that these neighbors can live in a nicely kept area through mostly their own efforts. I.e teach them to put toys and other things away. Learn to plant flowers and vegies and care for them . Wash outside of doors and windows. Volunteer to paint with materials provided by landlord. People need to take "pride" in where they live.	8/19/2014 6:33 PM
26	We have a problem here with not enough low income housing or support housing for our homeless population.	8/19/2014 1:43 PM
27	Jefferson County is very short on low income residential housing and competitive jobs that pay a living wage.	8/19/2014 12:29 PM
28	we need housing for inmates leaving jail or prison they are sleeping in backyards and alone with little support	8/19/2014 11:57 AM
29	Rents plus utility costs are now running over 50% of monthly take home. Hard to pay that and still cover food, medical, travel, & clothing, esp. with children in family.	8/19/2014 10:41 AM
30	If everyone had money they could live where they could afford.	8/18/2014 5:17 PM
31	To my knowledge, one income-based property to rent in Cambridge. The size of the aging population is growing and I don't see any sign of new income-based housing for that population.	8/18/2014 1:41 PM
32	Jefferson County does and has absolutely nothing for disabled. Everything offered is mostly thru St. Collett a and not open to public although those homes sit empty and readily available for disabled.	8/18/2014 11:09 AM
33	In our neighborhood we encourage residents by supporting efforts/interests to get things accomplished by the residents to improve our neighborhood. Sustainability of any program requires buy in and skin in the game.	8/14/2014 6:44 PM
34	HDMA data will provide info on race/ethnicity of mortgage loans initiated	8/14/2014 10:41 AM
35	I live in Waukesha County, but clients I work with are in Jefferson County. Lack of affordable transportation options to/from work for all shifts, 7 days/week is a large barrier to economic self-sufficiency.	8/12/2014 4:51 PM
36	Please provide a link to current resources related to these questions so we have the context to answer some of them. Knowing the answers regarding your city doesn't mean you know the answers to the county wide questions, and few survey responders will take the time to research while they're filling out the survey. Thanks!	8/12/2014 9:41 AM
37	We have more than enough low income housing in our community. It puts a tremulous strains on our already financially strapped schools.	8/11/2014 1:07 PM

**Q1 Indique el código postal en el que
reside.**

Answered: 61 Skipped: 23

#	Responses	Date
1	53094	9/4/2014 2:19 PM
2	53549	9/4/2014 2:17 PM
3	53094	9/4/2014 1:45 PM
4	53190	9/4/2014 1:41 PM
5	53549	9/4/2014 1:37 PM
6	53538	9/4/2014 1:28 PM
7	53190	9/4/2014 1:18 PM
8	53538	9/4/2014 1:14 PM
9	53094	9/4/2014 1:10 PM
10	53094	9/4/2014 1:02 PM
11	53538	9/4/2014 12:57 PM
12	53038	9/4/2014 11:56 AM
13	53551	9/4/2014 11:49 AM
14	53038	9/4/2014 11:19 AM
15	53094	9/4/2014 11:14 AM
16	53190	9/4/2014 11:03 AM
17	53038	9/4/2014 10:34 AM
18	53094	9/4/2014 10:25 AM
19	53551	9/4/2014 10:09 AM
20	53549	9/3/2014 4:54 PM
21	53549	9/3/2014 4:47 PM
22	53549	9/3/2014 4:43 PM
23	53549	9/3/2014 3:14 PM
24	53190	9/3/2014 3:05 PM
25	53549	9/3/2014 2:58 PM
26	53551	9/3/2014 2:51 PM
27	53549	9/3/2014 2:44 PM
28	53538	9/3/2014 2:35 PM
29	53594	9/3/2014 2:31 PM
30	59534	9/3/2014 2:13 PM
31	53551	9/3/2014 2:09 PM
32	53538	9/3/2014 2:08 PM

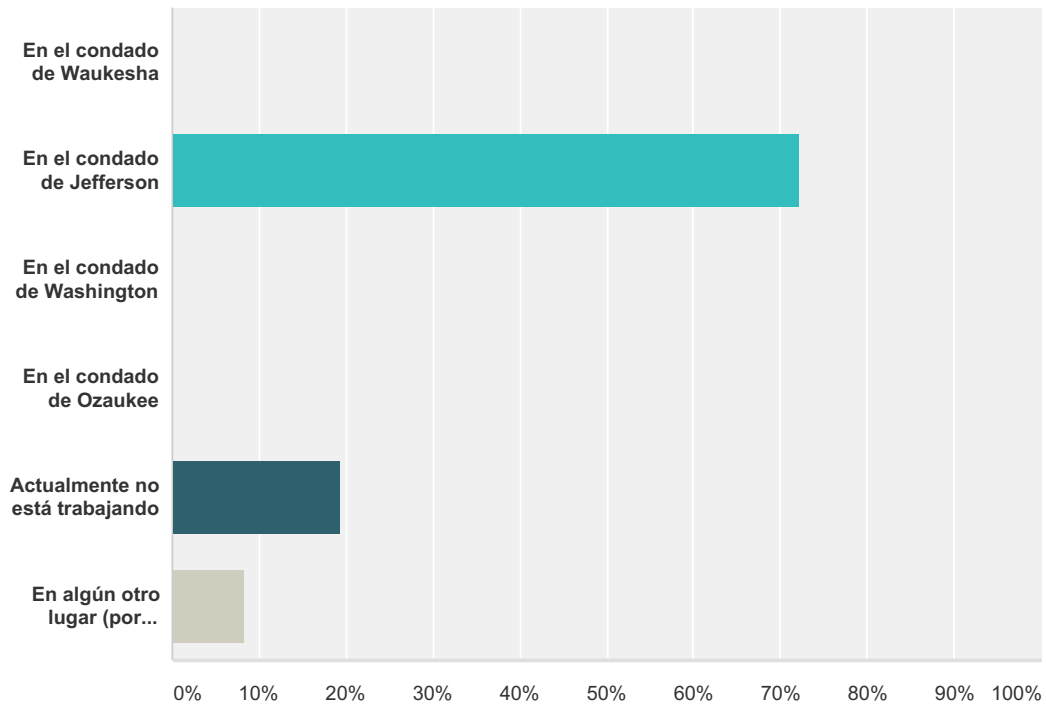
ENCUESTA PARA EL DEPARTAMENTO DE VIVIENDA Y LA
COMUNIDAD DEL CONDADO DE WAUKESHA

SurveyMonkey

33	53549	9/3/2014 2:01 PM
34	53094	9/3/2014 1:56 PM
35	53549	9/3/2014 1:52 PM
36	53094	9/3/2014 1:43 PM
37	53538	9/3/2014 1:35 PM
38	53094	9/3/2014 1:28 PM
39	53549	9/3/2014 1:23 PM
40	53544	9/3/2014 1:14 PM
41	53538	9/3/2014 1:12 PM
42	53549	9/3/2014 1:10 PM
43	53094	9/3/2014 1:07 PM
44	53551	9/3/2014 11:39 AM
45	53549	9/3/2014 11:32 AM
46	53549	9/3/2014 11:20 AM
47	53094	9/3/2014 11:05 AM
48	53551	9/3/2014 10:22 AM
49	53549	9/3/2014 10:18 AM
50	53156	9/3/2014 10:14 AM
51	53190	9/3/2014 10:11 AM
52	53538	9/3/2014 10:06 AM
53	53538	9/3/2014 9:49 AM
54	53549	9/3/2014 9:39 AM
55	53538	9/3/2014 9:37 AM
56	53551	9/3/2014 9:31 AM
57	53094	9/3/2014 9:22 AM
58	53549	9/3/2014 9:19 AM
59	53094	9/3/2014 9:13 AM
60	53549	9/3/2014 9:07 AM
61	53549	9/3/2014 9:01 AM

Q2 ¿Dónde Trabaja?

Answered: 72 Skipped: 12

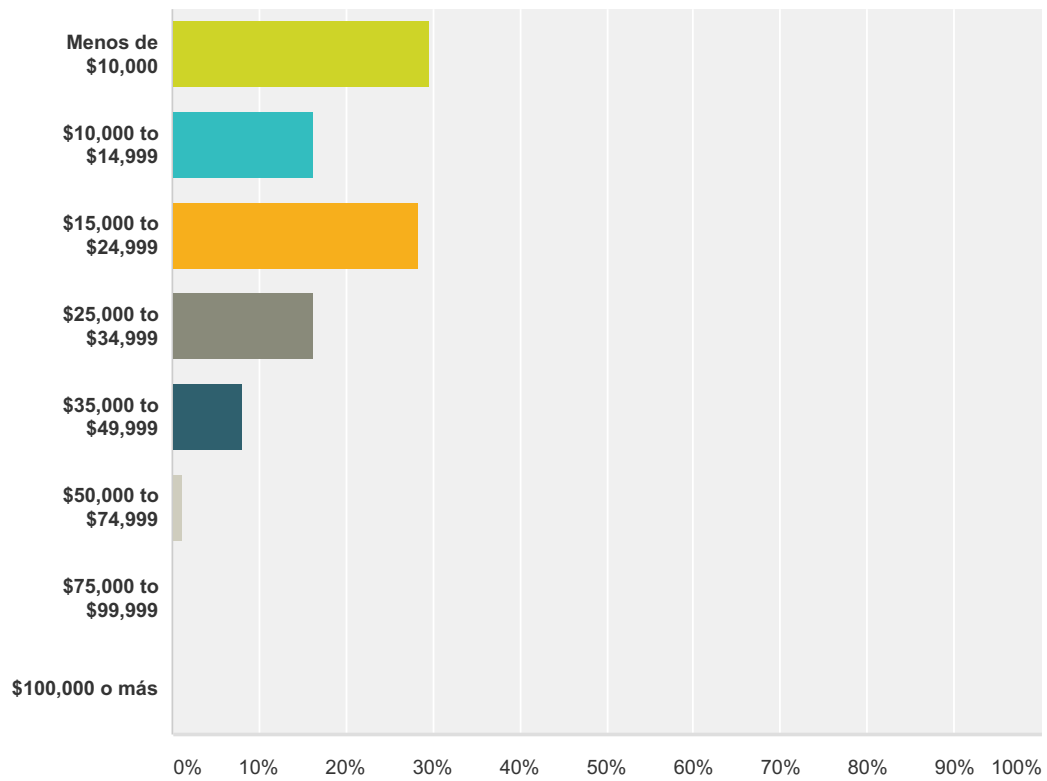


Answer Choices	Responses
En el condado de Waukesha	0.00% 0
En el condado de Jefferson	72.22% 52
En el condado de Washington	0.00% 0
En el condado de Ozaukee	0.00% 0
Actualmente no está trabajando	19.44% 14
En algún otro lugar (por favor, especifique)	8.33% 6
Total	72

#	En algún otro lugar (por favor, especifique)	Date
1	Home	9/4/2014 1:45 PM
2	En casa	9/4/2014 1:22 PM
3	Reesville	9/4/2014 1:02 PM
4	Whitewater	9/4/2014 11:03 AM
5	Rock County	9/3/2014 4:47 PM
6	Madison	9/3/2014 2:01 PM
7	Dane	9/3/2014 11:13 AM
8	Dane County	9/3/2014 10:06 AM

Q3 ¿Cuál es el ingreso anual de su hogar? (Incluya todas las fuentes)

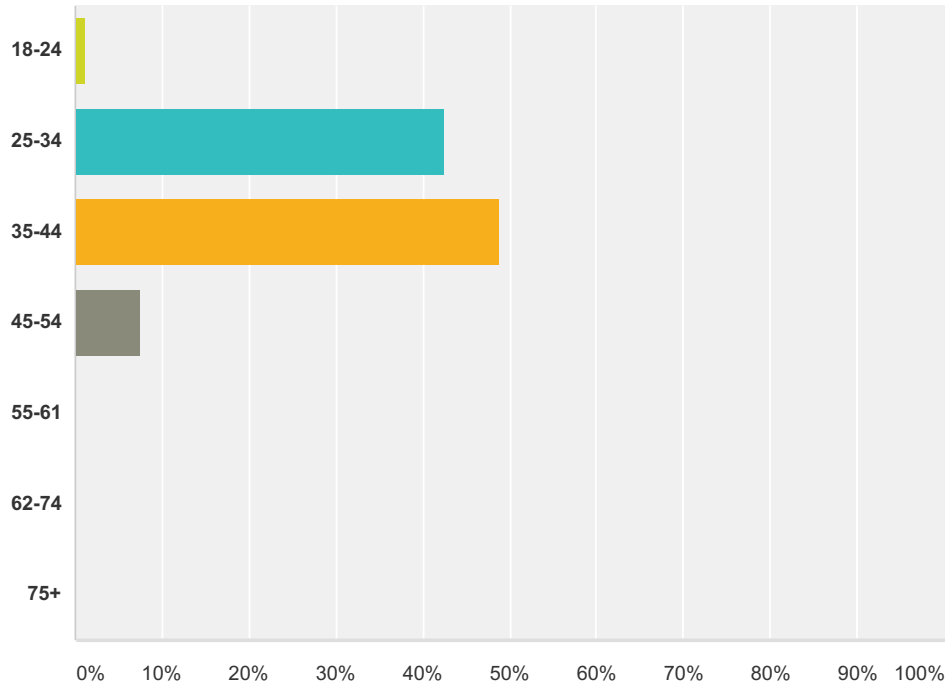
Answered: 74 Skipped: 10



Answer Choices	Responses
Menos de \$10,000	29.73% 22
\$10,000 to \$14,999	16.22% 12
\$15,000 to \$24,999	28.38% 21
\$25,000 to \$34,999	16.22% 12
\$35,000 to \$49,999	8.11% 6
\$50,000 to \$74,999	1.35% 1
\$75,000 to \$99,999	0.00% 0
\$100,000 o más	0.00% 0
Total	74

Q4 ¿A qué grupo de edad pertenece?

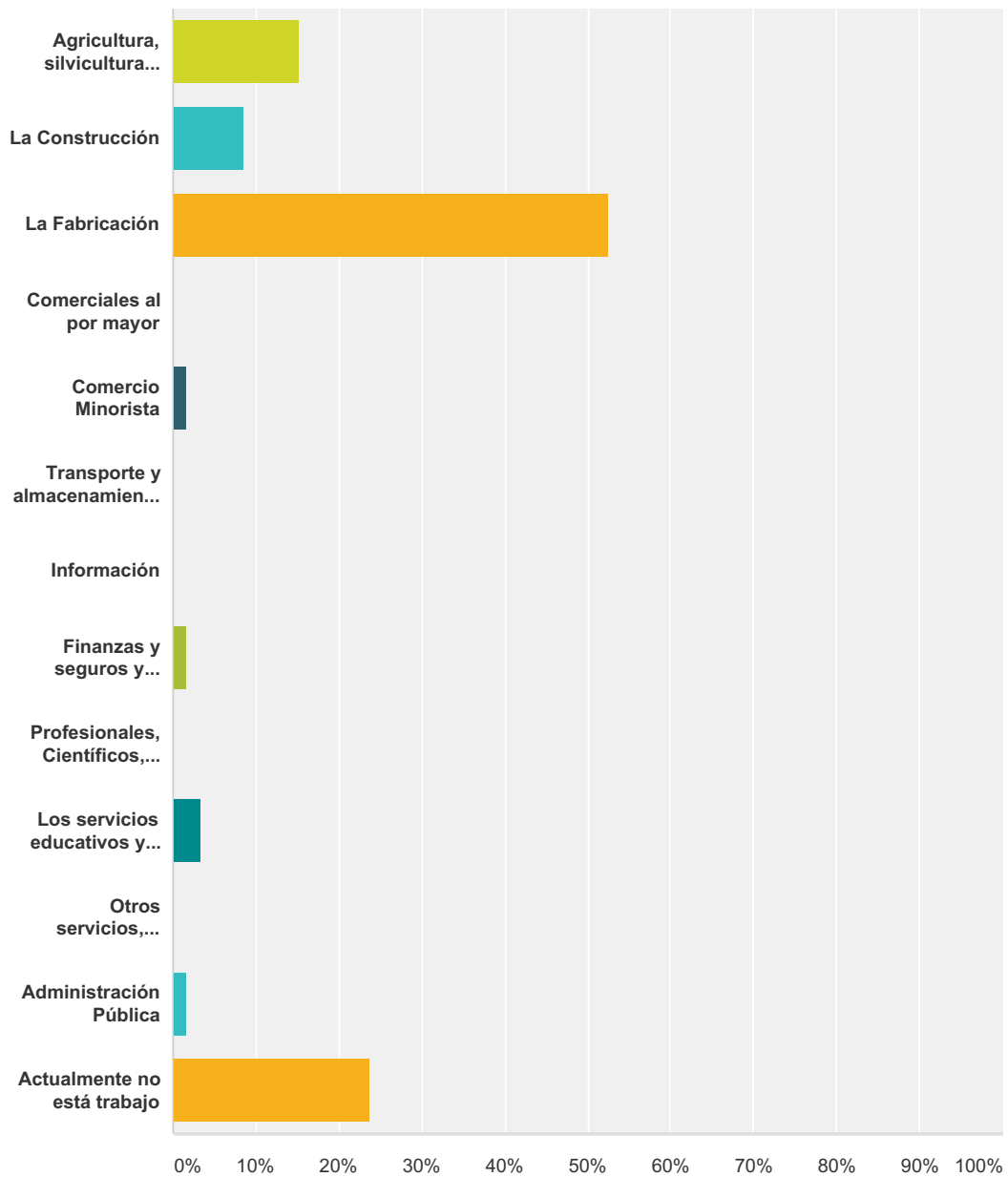
Answered: 80 Skipped: 4



Answer Choices	Responses
18-24	1.25% 1
25-34	42.50% 34
35-44	48.75% 39
45-54	7.50% 6
55-61	0.00% 0
62-74	0.00% 0
75+	0.00% 0
Total	80

Q5 ¿En cuál de los siguientes campos trabaja?

Answered: 59 Skipped: 25



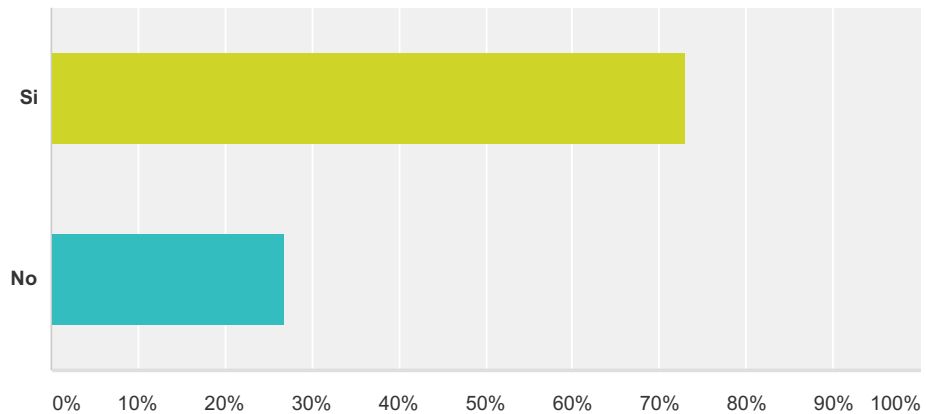
Answer Choices	Responses
Agricultura, silvicultura, pesca y caza, y minería	15.25% 9
La Construcción	8.47% 5
La Fabricación	52.54% 31
Comerciales al por mayor	0.00% 0
Comercio Minorista	1.69% 1

Transporte y almacenamiento, y los servicios públicos	0.00%	0
Información	0.00%	0
Finanzas y seguros y bienes raíces y alquiler y arrendamiento	1.69%	1
Profesionales, Científicos, y Administrativos y Servicios de administraciónde Despojos	0.00%	0
Los servicios educativos y servicios de salud y asistencia social	3.39%	2
Otros servicios, excepto administración pública	0.00%	0
Administración Pública	1.69%	1
Actualmente no está trabajo	23.73%	14
Total Respondents: 59		

#	Otro (especifique)	Date
1	Home	9/4/2014 1:46 PM
2	Cleaning	9/3/2014 2:02 PM

**Q6 La Oficina del Censo de EE.UU.
considera que las siguientes son "grupos
minoritarios:" Negro, Hispanos, asiáticos,
isleños del Pacífico, o indios americanos /
nativos de Alaska. ¿Es usted miembro de
uno de los grupos mencionados
anteriormente?**

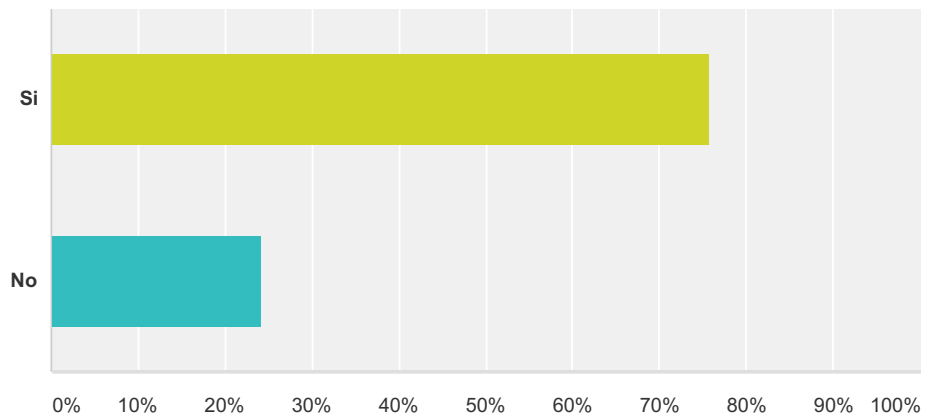
Answered: 63 Skipped: 21



Answer Choices	Responses	
Si	73.02%	46
No	26.98%	17
Total		63

Q7 ¿Hay otro idioma que no sea inglés hablado regularmente en su hogar?

Answered: 70 Skipped: 14



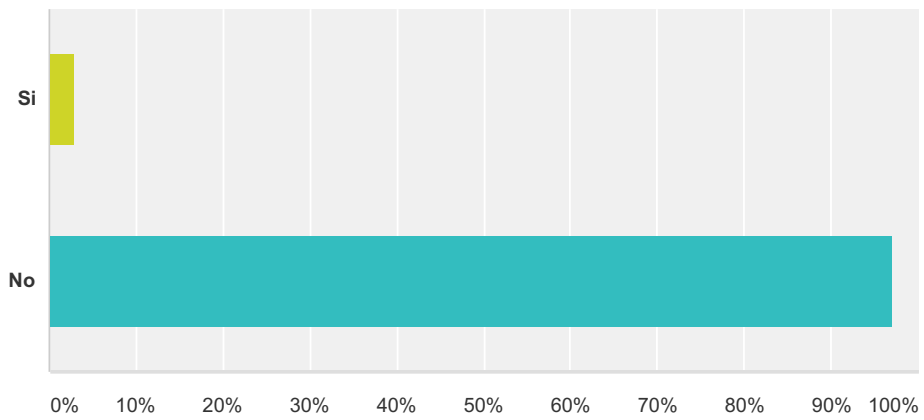
Answer Choices	Responses
Si	75.71% 53
No	24.29% 17
Total	70

#	En caso afirmativo, ¿qué idioma?	Date
1	Spanish	9/4/2014 1:46 PM
2	Spanish	9/4/2014 1:33 PM
3	Spanish	9/4/2014 1:23 PM
4	Spanish	9/4/2014 1:10 PM
5	Spanish	9/4/2014 12:58 PM
6	Spanish	9/4/2014 11:44 AM
7	Spanish	9/4/2014 11:36 AM
8	Spanish	9/4/2014 11:10 AM
9	Spanish	9/4/2014 10:46 AM
10	Spanish	9/4/2014 10:38 AM
11	Spanish	9/4/2014 10:34 AM
12	Espanol	9/3/2014 4:47 PM
13	Spanish	9/3/2014 4:43 PM
14	Spanish	9/3/2014 3:14 PM
15	Spanish	9/3/2014 2:45 PM
16	Spanish	9/3/2014 2:14 PM
17	Spanish	9/3/2014 2:08 PM
18	Spanish	9/3/2014 2:02 PM

19	Spanish	9/3/2014 1:43 PM
20	Spanish	9/3/2014 1:35 PM
21	Spanish	9/3/2014 1:28 PM
22	Spanish	9/3/2014 1:24 PM
23	Spanish	9/3/2014 11:44 AM
24	Spanish	9/3/2014 11:32 AM
25	Spanish	9/3/2014 11:20 AM
26	Spanish	9/3/2014 11:14 AM
27	Spanish	9/3/2014 10:48 AM
28	Spanish	9/3/2014 10:23 AM
29	Spanish	9/3/2014 10:19 AM
30	Spanish	9/3/2014 10:07 AM
31	Spanish	9/3/2014 9:39 AM
32	Spanish	9/3/2014 9:31 AM
33	Spanish	9/3/2014 9:23 AM
34	Spanish	9/3/2014 9:13 AM
35	Spanish	9/3/2014 9:02 AM

Q8 ¿Hay alguien en su hogar tiene una discapacidad?

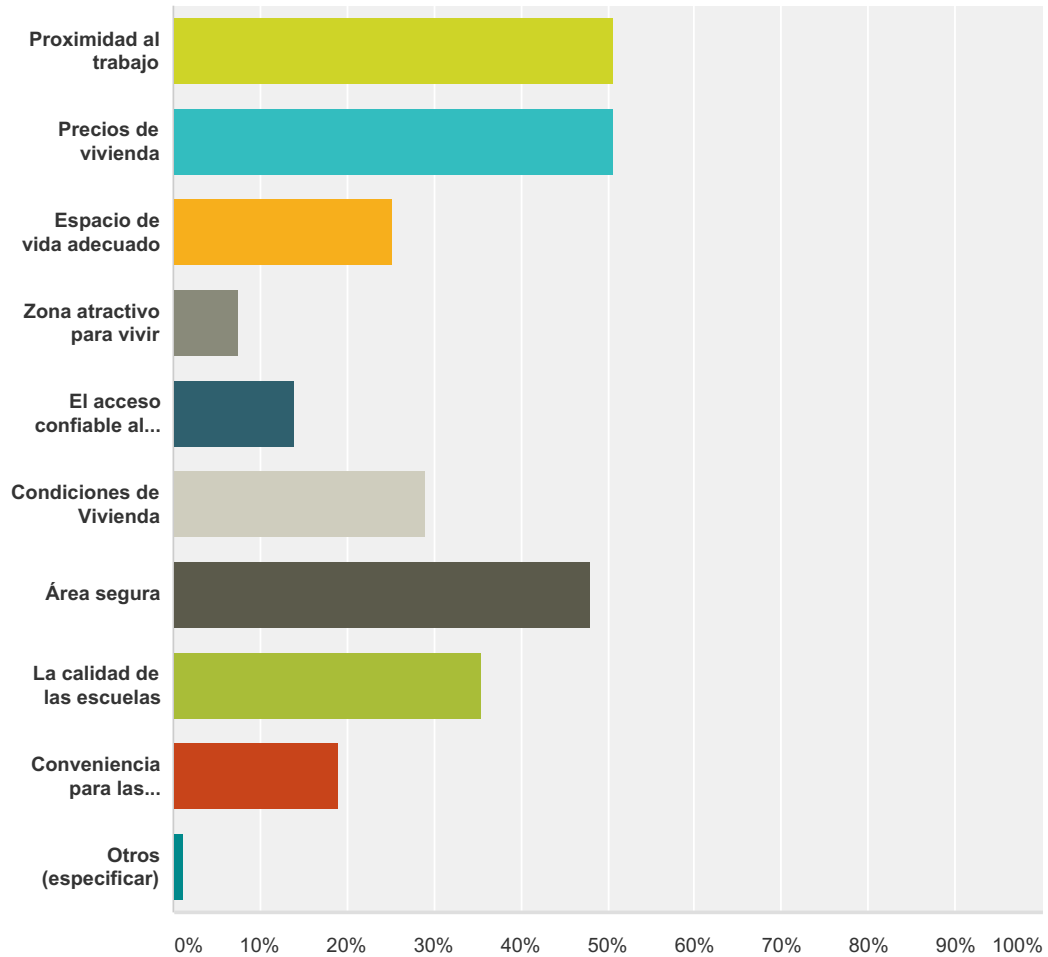
Answered: 67 Skipped: 17



Answer Choices	Responses
Si	2.99% 2
No	97.01% 65
Total	67

**Q9 ¿Cuál de los siguientes son
consideraciones importantes para usted en
la elección de un lugar para vivir?
(SELECCIONAR TODO LO QUE
CORRESPONDA)**

Answered: 79 Skipped: 5

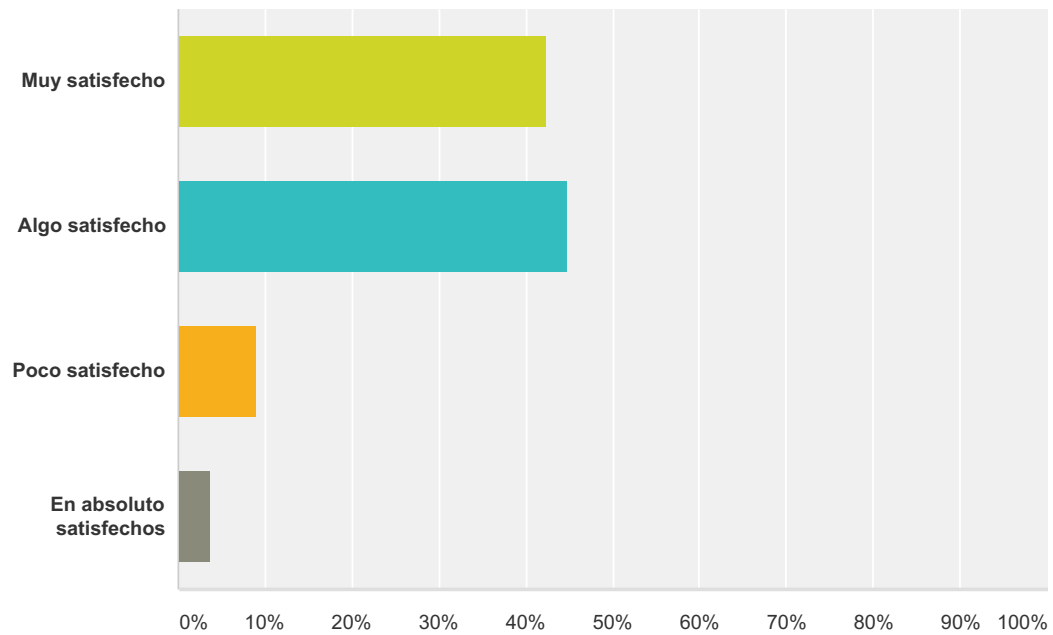


Answer Choices	Responses
Proximidad al trabajo	50.63% 40
Precios de vivienda	50.63% 40
Espacio de vida adecuado	25.32% 20
Zona atractivo para vivir	7.59% 6
El acceso confiable al transporte público	13.92% 11
Condiciones de Vivienda	29.11% 23
Área segura	48.10% 38

La calidad de las escuelas	35.44%	28
Conveniencia para las instalaciones como los servicios médicos y áreas comerciales	18.99%	15
Otros (especificar)	1.27%	1
Total Respondents: 79		

Q10 ¿Cuál es su nivel de satisfacción está con su situación de vida actual?

Answered: 78 Skipped: 6

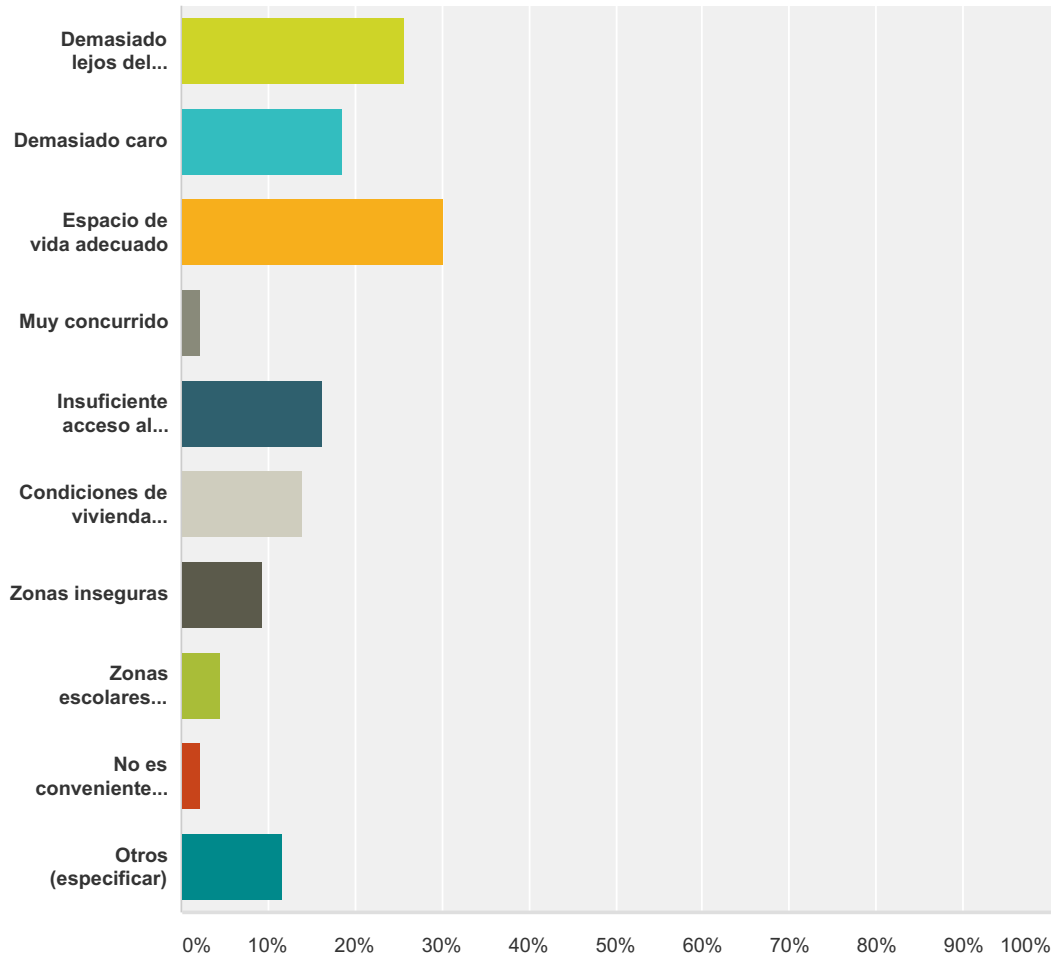


Answer Choices	Responses
Muy satisfecho	42.31% 33
Algo satisfecho	44.87% 35
Poco satisfecho	8.97% 7
En absoluto satisfechos	3.85% 3
Total Respondents: 78	

#	Otro (especifique)	Date
	There are no responses.	

**Q11 Si usted no está satisfecho con su actual lugar para vivir, ¿cuáles son las razones de su?Insatisfacción?
(SELECCIONAR TODO LO QUE CORRESPONDA)**

Answered: 43 Skipped: 41



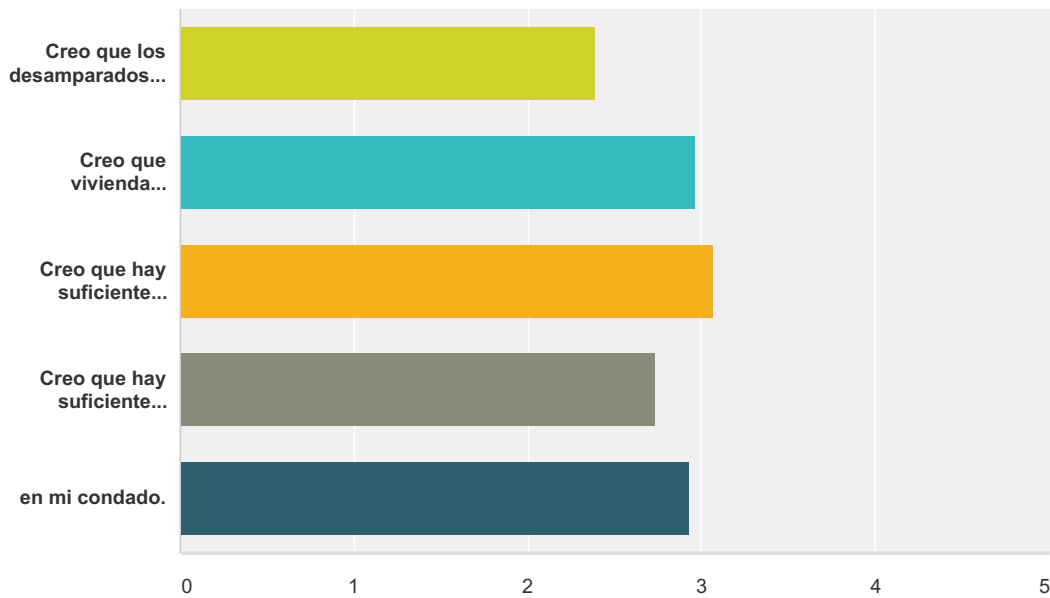
Answer Choices	Responses
Demasiado lejos del trabajo	25.58% 11
Demasiado caro	18.60% 8
Espacio de vida adecuado	30.23% 13
Muy concurrido	2.33% 1
Insuficiente acceso al transporte público	16.28% 7
Condiciones de vivienda inadecuada	13.95% 6
Zonas inseguras	9.30% 4

Zonas escolares inferiores	4.65%	2
No es conveniente para las instalaciones como los servicios médicos y áreas comerciales	2.33%	1
Otros (especificar)	11.63%	5
Total Respondents: 43		

#	Otro (especifique)	Date
1	None	9/4/2014 1:46 PM
2	Racist	9/4/2014 10:19 AM
3	New tenant	9/3/2014 2:26 PM
4	Own place to live	9/3/2014 11:22 AM
5	Hospital or clinics	9/3/2014 10:24 AM
6	too small \$600.00 a month	9/3/2014 9:41 AM

Q12 Por favor, indique su respuesta a las siguientes declaraciones.

Answered: 61 Skipped: 23

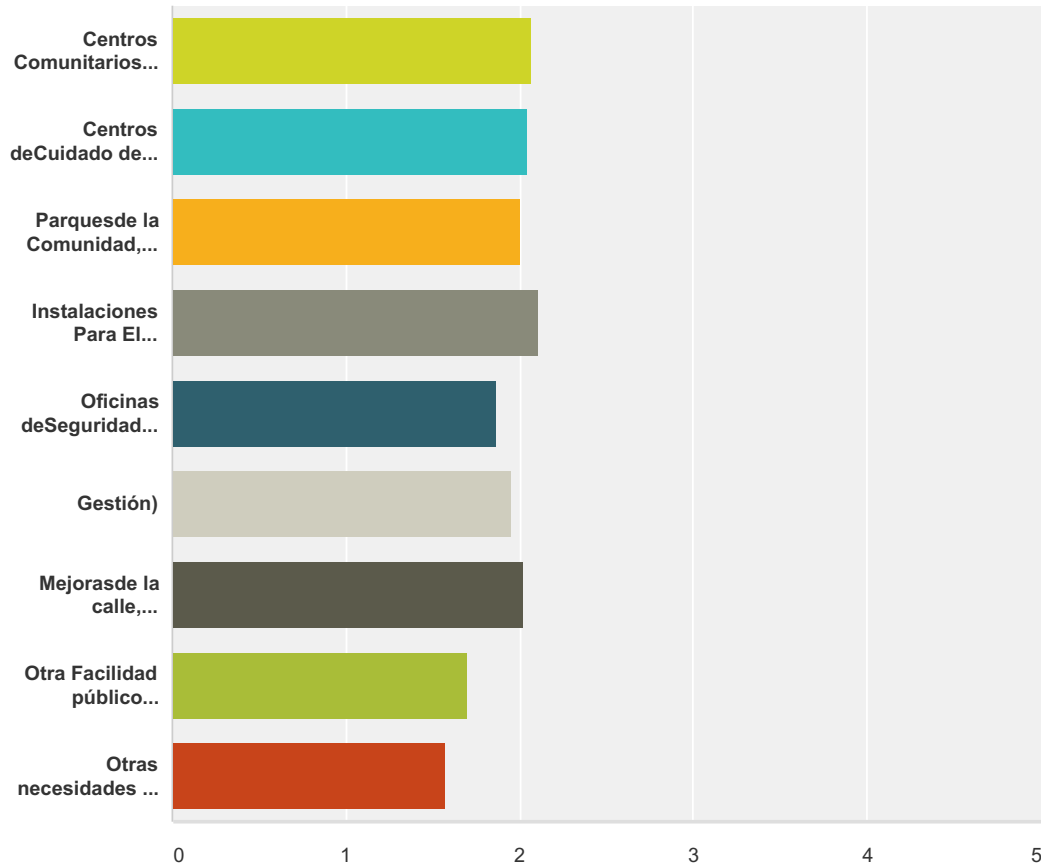


	Fuertemente Desacuerdo	Algo Desacuerdo	ni de acuerdo ni en desacuerdo	Algo de acuerdo	Totalmente de acuerdo	Total	Average Rating
Creo que los desamparados son un problema en mi condado	36.84% 21	12.28% 7	36.84% 21	3.51% 2	10.53% 6	57	2.39
Creo que vivienda económica es un problema enmi condado.	25.00% 14	14.29% 8	23.21% 13	14.29% 8	23.21% 13	56	2.96
Creo que hay suficiente Servicios para personas con bajos Ingresose ingresos moderados en mi condado.	14.29% 8	25.00% 14	19.64% 11	21.43% 12	19.64% 11	56	3.07
Creo que hay suficiente opciones de transporte para las personas con ingresos bajos y moderados	18.87% 10	24.53% 13	33.96% 18	9.43% 5	13.21% 7	53	2.74
en mi condado.	16.67% 5	20.00% 6	36.67% 11	6.67% 2	20.00% 6	30	2.93

#	Otra Facilidad pública necesitan mencionados anteriormente	Date
1	Living in Waterloo, no taxi service for students	9/4/2014 11:42 AM

Q13 Por favor clasifique las siguientes necesidades de instalaciones públicas en Su condado sobre una escala que vadesde un mínimola necesidad deuna alta necesidad.

Answered: 70 Skipped: 14



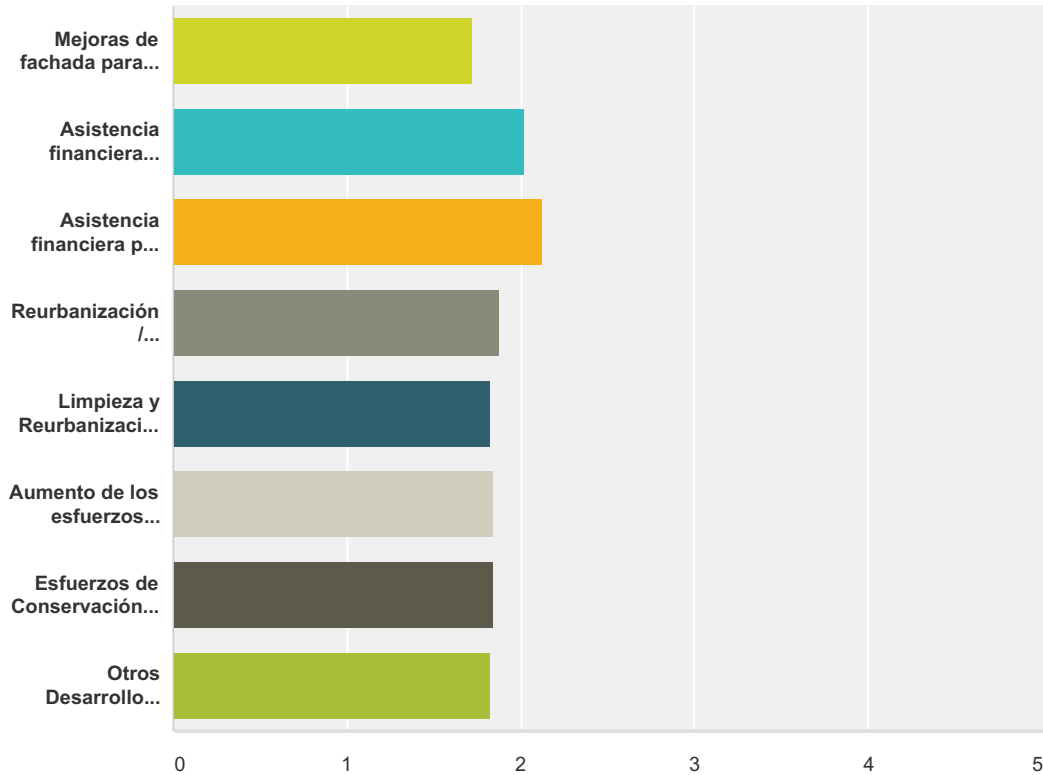
	Necesidades Mínimas	Necesidades Razonables	Gran Necesidades	Total	Average Rating
Centros Comunitarios e Instalaciones (Centros de Juventud, Centros de Mayores)	15.00% 9	63.33% 38	21.67% 13	60	2.07
Centros de Cuidado de Niños	21.31% 13	52.46% 32	26.23% 16	61	2.05
Parques de la Comunidad, Instalaciones recreativas y Centros de Culturales	25.93% 14	48.15% 26	25.93% 14	54	2.00
Instalaciones Para El Cuidado Salud	21.05% 12	47.37% 27	31.58% 18	57	2.11
Oficinas de Seguridad Pública (bomberos, Policía, Emergencias)	36.54% 19	40.38% 21	23.08% 12	52	1.87
Gestión)	26.83% 11	51.22% 21	21.95% 9	41	1.95

Mejorasde la calle, carretera ola acera	26.09% 12	45.65% 21	28.26% 13	46	2.02
Otra Facilidad público necesitano mencionados anteriormente	35.00% 14	60.00% 24	5.00% 2	40	1.70
Otras necesidades de equipamiento público (por favor, especifique)	45.16% 14	51.61% 16	3.23% 1	31	1.58

#	Otros Desarrollo Económico / comunidad necesita no mencionados anteriormente	Date
1	More job opportunities	9/3/2014 4:56 PM
2	More guidance for the immigrant community	9/3/2014 1:49 PM
3	Help with Medications	9/3/2014 10:50 AM

**Q14 Por favor clasifique las siguientes
necesidades de desarrollo
económico/Comunidad en su Condado en
una escala que se extiende desde un
mínima necesidad de una alta necesidad.**

Answered: 61 Skipped: 23



	Necesidades Mínimas	Necesidades Razonables	Gran Necesidades	Total	Average Rating
Mejoras de fachada para los negocios	40.74% 22	46.30% 25	12.96% 7	54	1.72
Asistencia financiera adicional para Las Organizaciones de la Comunidad	20.37% 11	57.41% 31	22.22% 12	54	2.02
Asistencia financiera para los empresarios y creadores de empleo	14.81% 8	57.41% 31	27.78% 15	54	2.13
Reurbanización / Rehabilitación / Demolición Propiedades arruinadas	31.37% 16	49.02% 25	19.61% 10	51	1.88
Limpieza y Reurbanización de Desamparadas zonas industriales	30.19% 16	56.60% 30	13.21% 7	53	1.83
Aumento de los esfuerzos Reglamento de Aplicación	27.66% 13	59.57% 28	12.77% 6	47	1.85
Esfuerzos de Conservación Histórica	29.17% 14	56.25% 27	14.58% 7	48	1.85

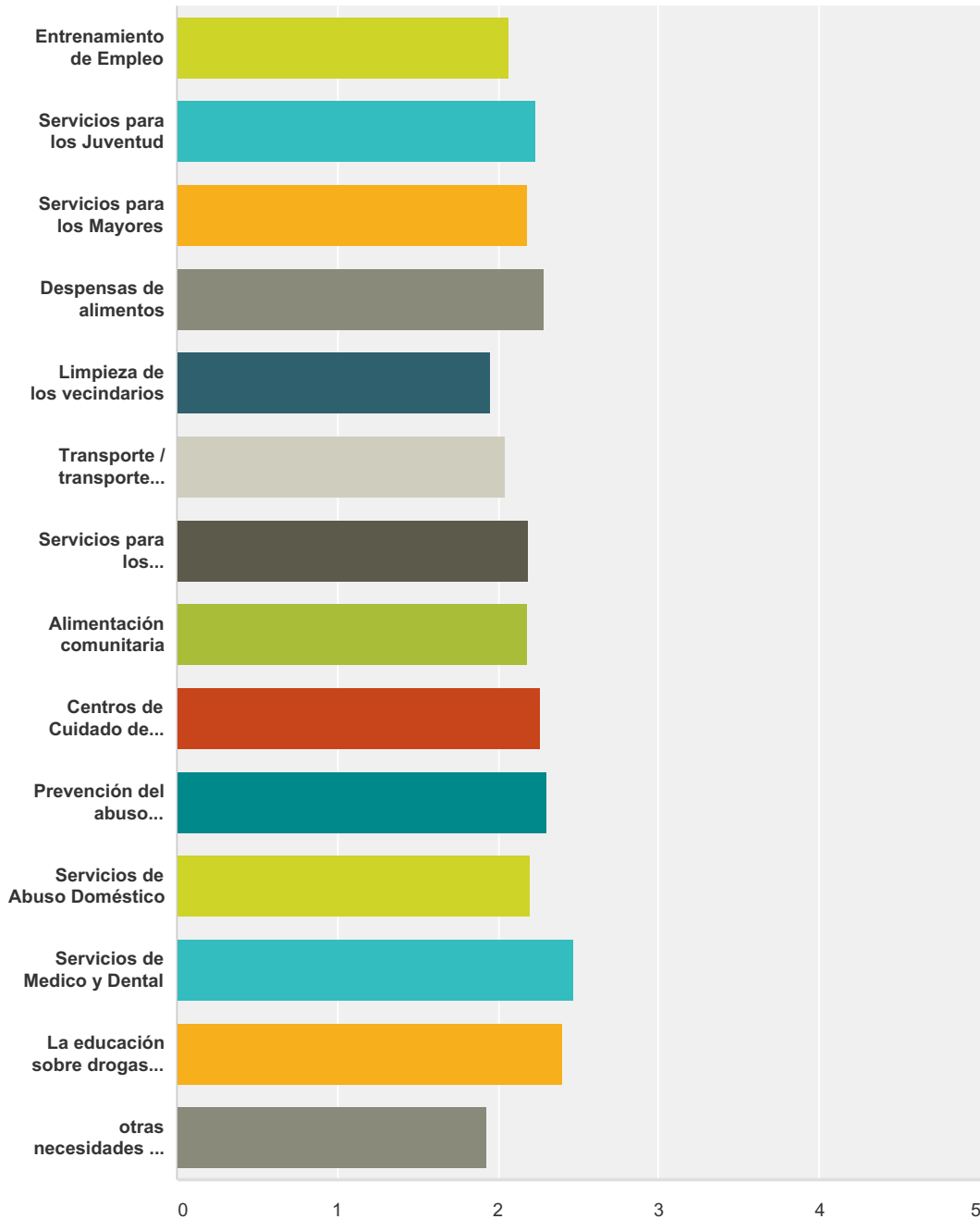
ENCUESTA PARA EL DEPARTAMENTO DE VIVIENDA Y LA
 COMUNIDAD DEL CONDADO DE WAUKESHA

Otros Desarrollo Económico / comunidad necesita no mencionados anteriormente	33.33% 12	50.00% 18	16.67% 6	36	1.83
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#	Otras necesidades de vivienda no mencionados anteriormente	Date
1	For Kindergartens	9/3/2014 10:52 AM

**Q15 Por favor clasifique las siguientes
necesidades de Servicio Públicas en su
Condado sobre una escala que va desde
menos necesidad de una alta necesidad.**

Answered: 73 Skipped: 11



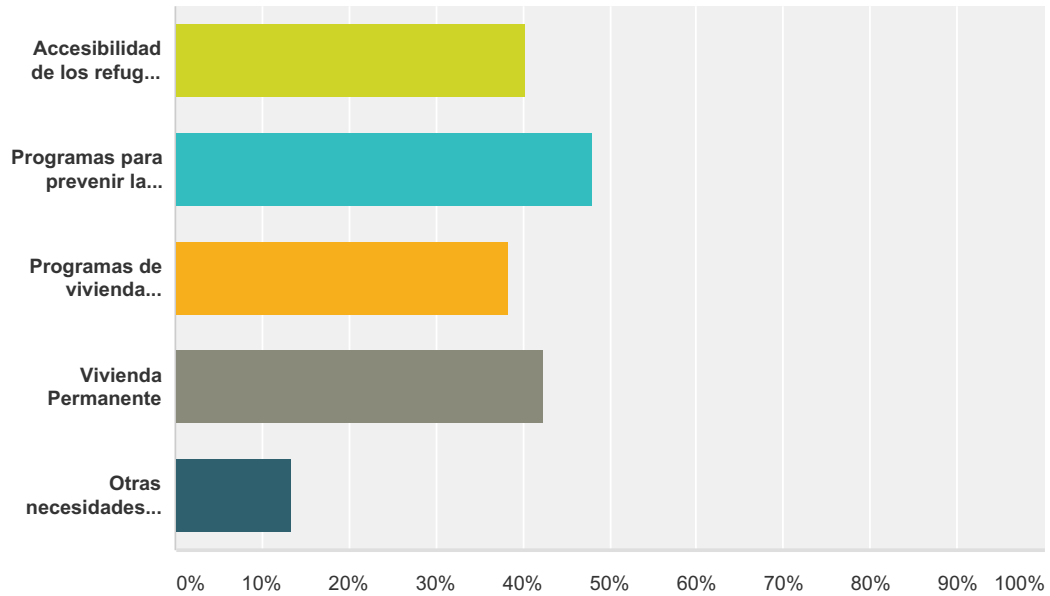
	Necesidades Mínimas	Necesidades Razonables	Gran Necesidades	Total	Average Rating
Entrenamiento de Empleo	20.00% 12	53.33% 32	26.67% 16	60	2.07

Servicios para los Juventud	11.67% 7	53.33% 32	35.00% 21	60	2.23
Servicios para los Mayores	14.29% 8	53.57% 30	32.14% 18	56	2.18
Despensas de alimentos	12.90% 8	45.16% 28	41.94% 26	62	2.29
Limpieza de los vecindarios	25.42% 15	54.24% 32	20.34% 12	59	1.95
Transporte / transporte compartido Taxis	22.03% 13	50.85% 30	27.12% 16	59	2.05
Servicios para los desamparados	17.54% 10	45.61% 26	36.84% 21	57	2.19
Alimentación comunitaria	12.50% 7	57.14% 32	30.36% 17	56	2.18
Centros de Cuidado de Niños	12.96% 7	48.15% 26	38.89% 21	54	2.26
Prevención del abuso infantil/Clases de crianza apropiada	11.54% 6	46.15% 24	42.31% 22	52	2.31
Servicios de Abuso Doméstico	18.52% 10	42.59% 23	38.89% 21	54	2.20
Servicios de Medico y Dental	7.02% 4	38.60% 22	54.39% 31	57	2.47
La educación sobre drogas / prevención del delito	12.73% 7	34.55% 19	52.73% 29	55	2.40
otras necesidades de servicio público (por favor, especifique)	26.67% 8	53.33% 16	20.00% 6	30	1.93

#	Otras necesidades para los Desamparados no mencionados anteriormente	Date
1	Put in schools help for children with their tasks	9/4/2014 2:21 PM
2	Electricity - gas that is very high.	9/4/2014 11:26 AM
3	Medical assistance / Dental assistance always too expensive. No payments available for ppl w/no insurance	9/3/2014 9:44 AM

**Q16 Por favor clasifique las siguientes
necesidades de Desamparados en su
Condado sobre una escala que va desde un
mínimonecesidades una alta necesidad.**

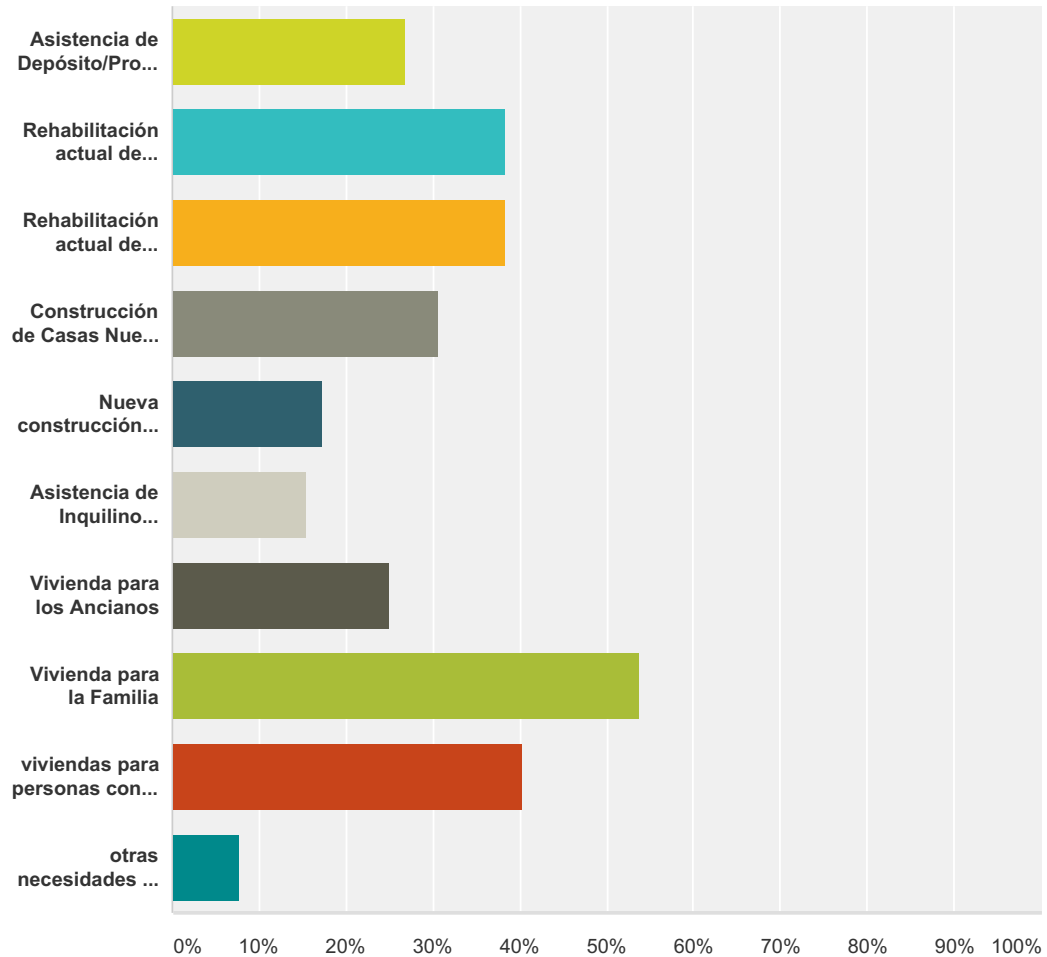
Answered: 52 Skipped: 32



Answer Choices	Responses
Accesibilidad de los refugios Para los desamparados	40.38% 21
Programas para prevenir la carencia de hogar	48.08% 25
Programas de vivienda Adicionales para Transición y de apoyo	38.46% 20
Vivienda Permanente	42.31% 22
Otras necesidades para los Desamparados no mencionados anteriormente	13.46% 7
Total Respondents: 52	

Q17 Por favor clasifique las siguientes Necesidades de Vivienda dentro de su Condado en una escala que va desde un mínimo necesidad una alta necesidad.

Answered: 52 Skipped: 32

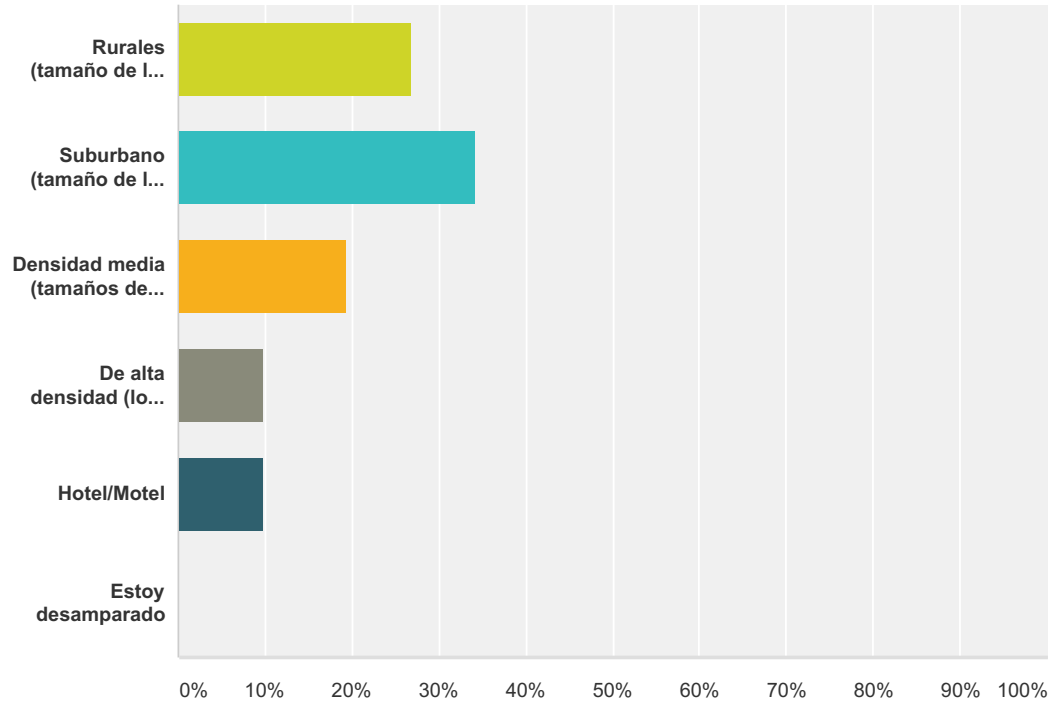


Answer Choices	Responses
Asistencia de Depósito/Programa de Propietario Por Primera vez	26.92% 14
Rehabilitación actual de Vivienda incluyendo Préstamos y becas Introducir mejoras en actual Vivienda para hacer más Eficiencia Energética	38.46% 20
Rehabilitación actual de Unidades de alquiler incluyendo Préstamos y becas	38.46% 20
Construcción de Casas Nuevas Para vivienda propia	30.77% 16
Nueva construcción de las unidades de alquiler asequibles	17.31% 9
Asistencia de Inquilino basada para el alquiler	15.38% 8
Vivienda para los Ancianos	25.00% 13
Vivienda para la Familia	53.85% 28

viviendas para personas con discapacidad	40.38%	21
otras necesidades de vivienda (por favor, especifique)	7.69%	4
Total Respondents: 52		

**Q18 Por favor, seleccione la categoría
residencial que mejor describe donde usted
vive.**

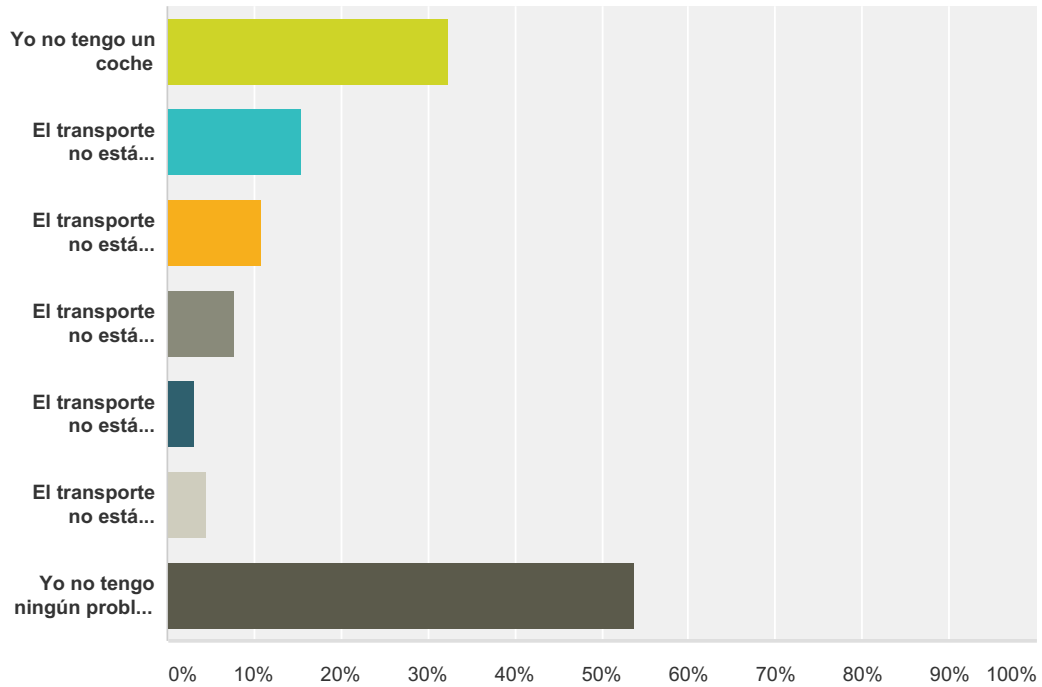
Answered: 41 Skipped: 43



Answer Choices	Responses
Rurales (tamaño de los lotes de 1 hectárea o más grande)	26.83% 11
Suburbano (tamaño de los lotes de medio acre a menos de 1 acre)	34.15% 14
Densidad media (tamaños de lote de un cuarto acre a menos de medio acre)	19.51% 8
De alta densidad (lotes menores cuarto de acre o multifamiliares con 4 unidades o más por edificio)	9.76% 4
Hotel/Motel	9.76% 4
Estoy desamparado	0.00% 0
Total	41

**Q19 Sírvase indicar las dificultades que pueda tener en relación con el transporte.
(CONSULTAR TODO LO QUE CORRESPONDA)**

Answered: 65 Skipped: 19

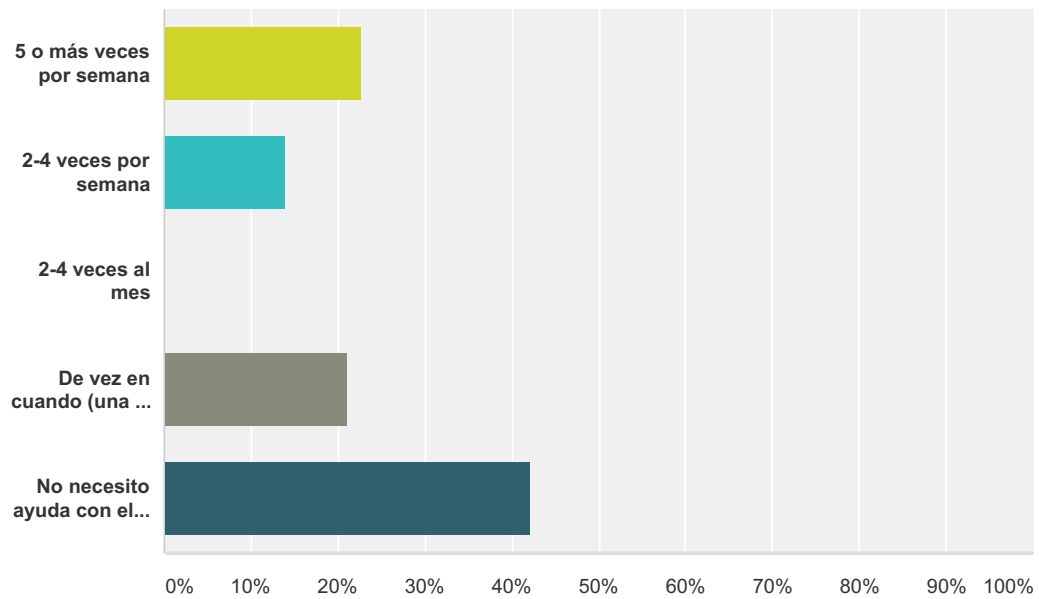


Answer Choices	Responses
Yo no tengo un coche	32.31% 21
El transporte no está disponible de mi casa al trabajo	15.38% 10
El transporte no está disponible de mi casa con mis servicios médicos	10.77% 7
El transporte no está disponible para los servicios públicos que necesito	7.69% 5
El transporte no está disponible los fines de semana (viernes por la tarde a domingo)	3.08% 2
El transporte no está disponible entre semana después de las 5:00	4.62% 3
Yo no tengo ningún problema de transporte	53.85% 35
Total Respondents: 65	

#	Otro (especifique)	Date
1	I do not drive	9/3/2014 2:48 PM

Q20 Por favor, compruebe la frecuencia que usted necesita ayuda con el transporte. Contando ida y vuelta como un viaje como una instancia de asistencia.

Answered: 57 Skipped: 27

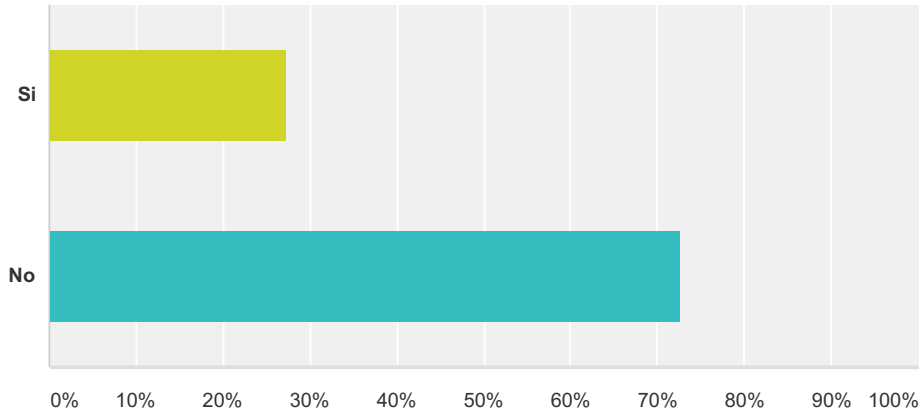


Answer Choices	Responses
5 o más veces por semana	22.81% 13
2-4 veces por semana	14.04% 8
2-4 veces al mes	0.00% 0
De vez en cuando (una vez al mes o menos)	21.05% 12
No necesito ayuda con el transporte	42.11% 24
Total Respondents: 57	

#	Otro (especifique)	Date
	There are no responses.	

Q21 ¿Viviendo en su Condado, has experimentado la discriminación de la vivienda?

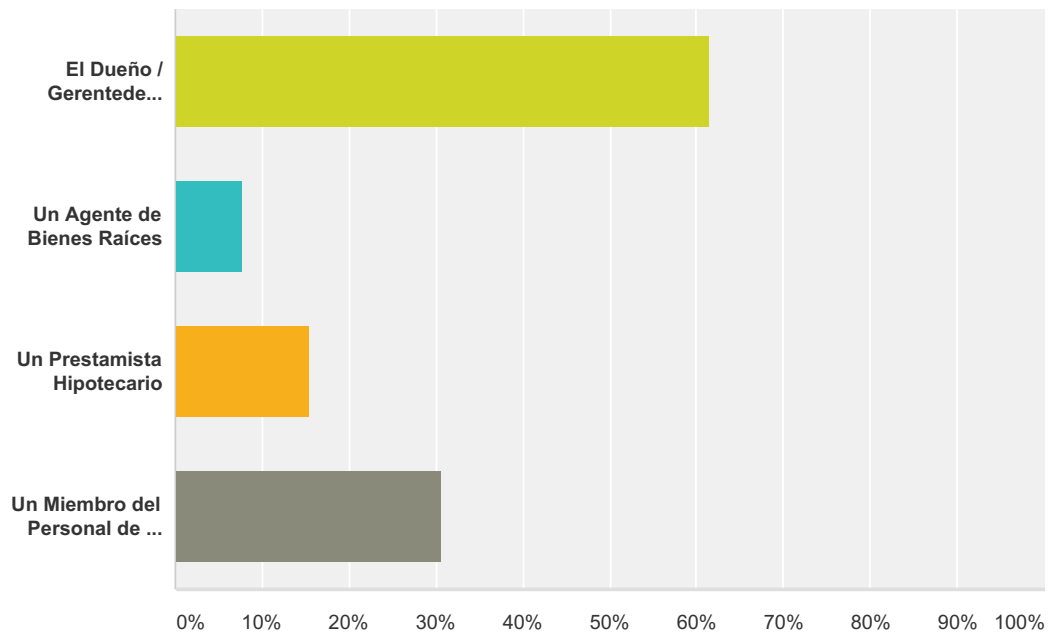
Answered: 66 Skipped: 18



Answer Choices	Responses
Si	27.27% 18
No	72.73% 48
Total	66

Q22 ¿Quién lo discriminó? (Marque lo que corresponda)

Answered: 13 Skipped: 71

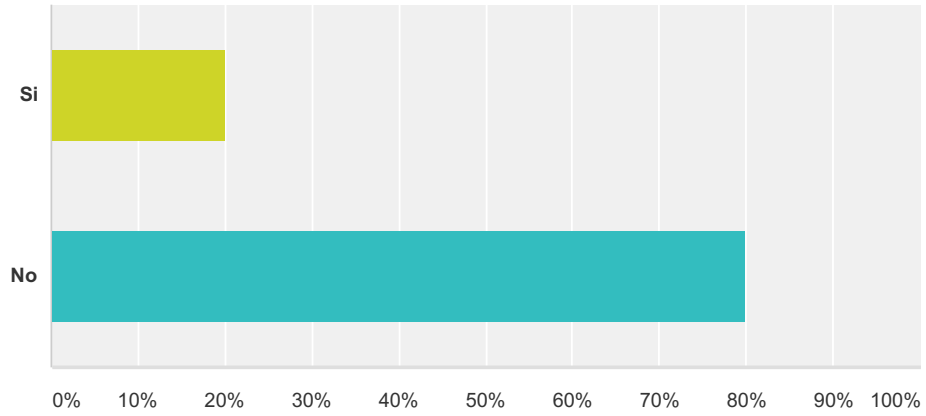


Answer Choices	Responses
El Dueño / Gerentede propiedad	61.54% 8
Un Agente de Bienes Raíces	7.69% 1
Un Prestamista Hipotecario	15.38% 2
Un Miembro del Personal de la Ciudad / Condado	30.77% 4
Total Respondents: 13	

#	Otro (especifique)	Date
1	Doctors clinic for language	9/4/2014 1:36 PM
2	The offices of the apartments	9/4/2014 10:21 AM
3	Manager	9/3/2014 10:57 AM
4	the person in charge of the app.	9/3/2014 9:47 AM

Q23 Sobre de su respuesta que ha sido víctima de discriminación, ¿Ha reportado la discriminación?

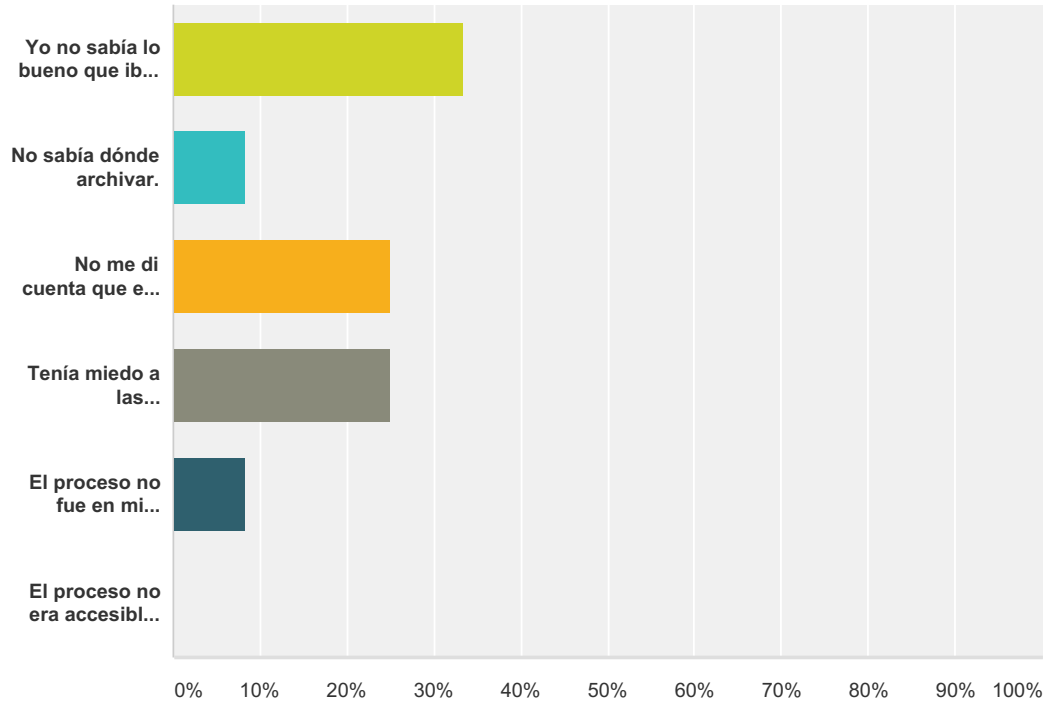
Answered: 20 Skipped: 64



Answer Choices	Responses
Si	20.00% 4
No	80.00% 16
Total	20

Q24 Si usted no presentó un informe, ¿Por qué no presentó una queja? (SELECCIONAR UNA SOLA)

Answered: 12 Skipped: 72

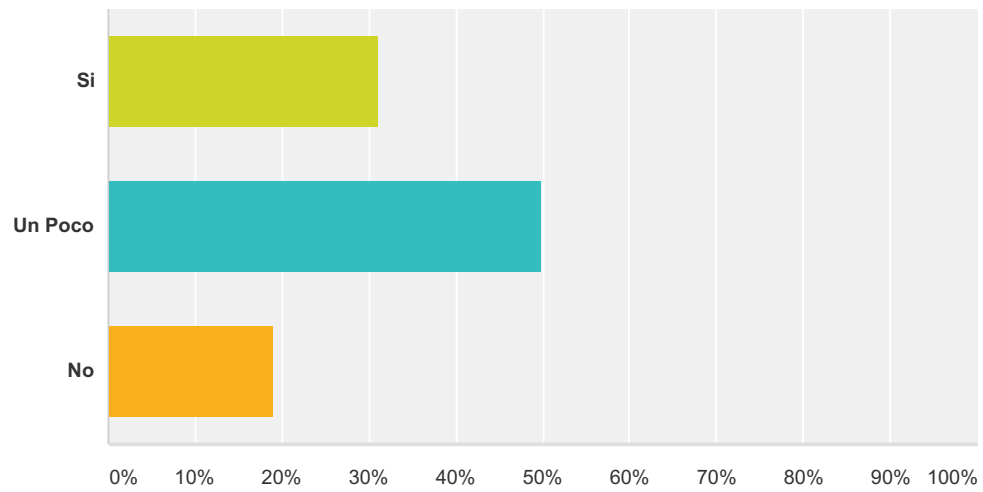


Answer Choices	Responses
Yo no sabía lo bueno que iba a hacer.	33.33% 4
No sabía dónde archivar.	8.33% 1
No me di cuenta que era una violación de la ley.	25.00% 3
Tenía miedo a las represalias.	25.00% 3
El proceso no fue en mi idioma.	8.33% 1
El proceso no era accesible para mí debido a una discapacidad.	0.00% 0
Total	12

#	Otro (especifique)	Date
1	Because no English	9/4/2014 2:23 PM
2	Not have much forms of communication	9/3/2014 11:03 AM

Q25 ¿Entiende sus derechos de equidad de vivienda?

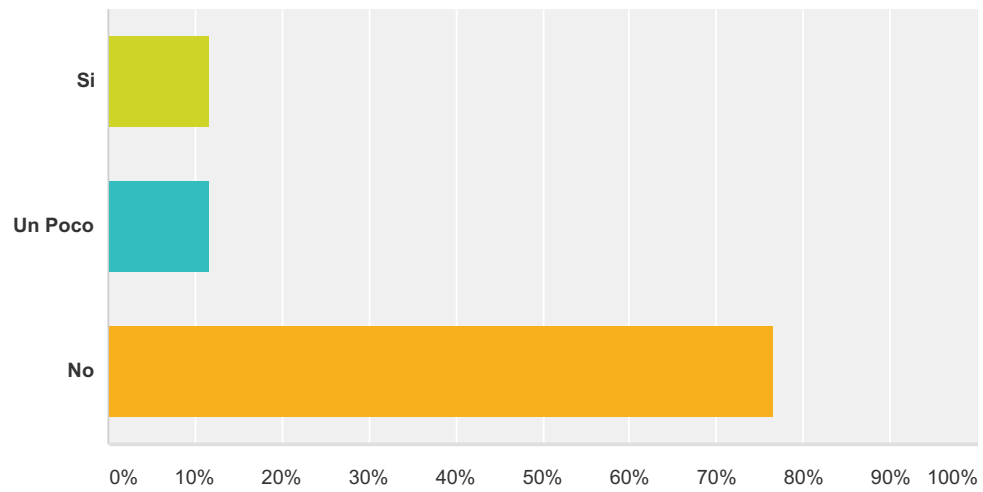
Answered: 58 Skipped: 26



Answer Choices	Responses
Si	31.03% 18
Un Poco	50.00% 29
No	18.97% 11
Total	58

Q26 ¿Sabe usted dónde archivar una queja de discriminación de vivienda?

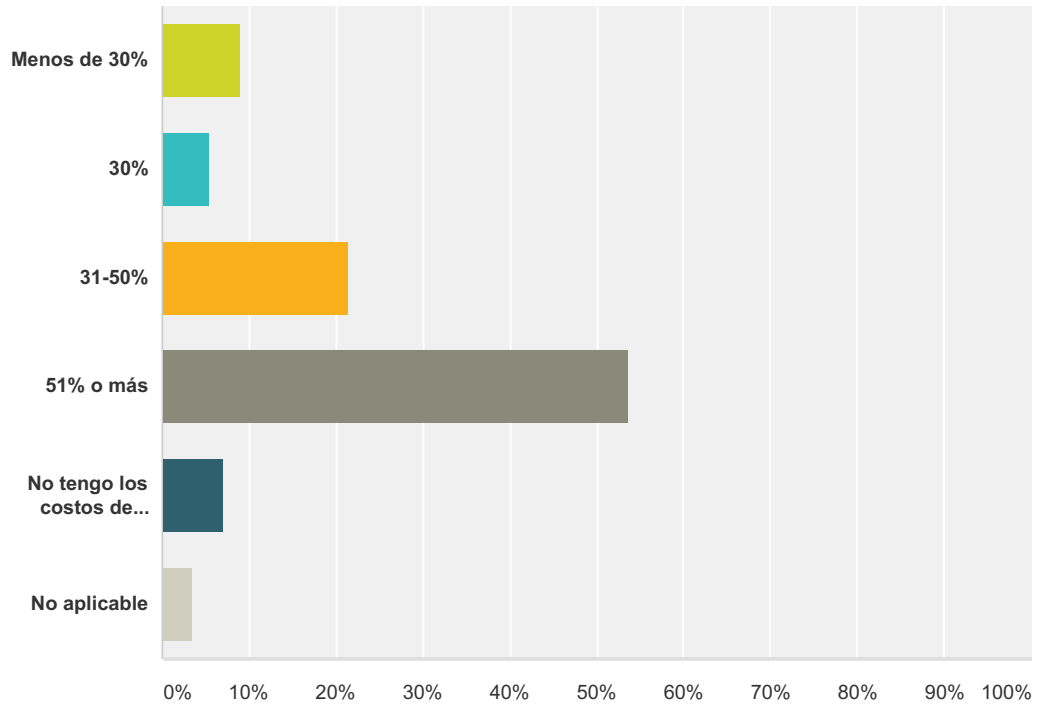
Answered: 60 Skipped: 24



Answer Choices	Responses
Si	11.67% 7
Un Poco	11.67% 7
No	76.67% 46
Total	60

**Q27 ¿Qué porcentaje de su ingreso mensual se utiliza para gastos de vivienda?
(incluye alquiler O los pagos de la hipoteca,
impuestos, seguros, y utilidades)**

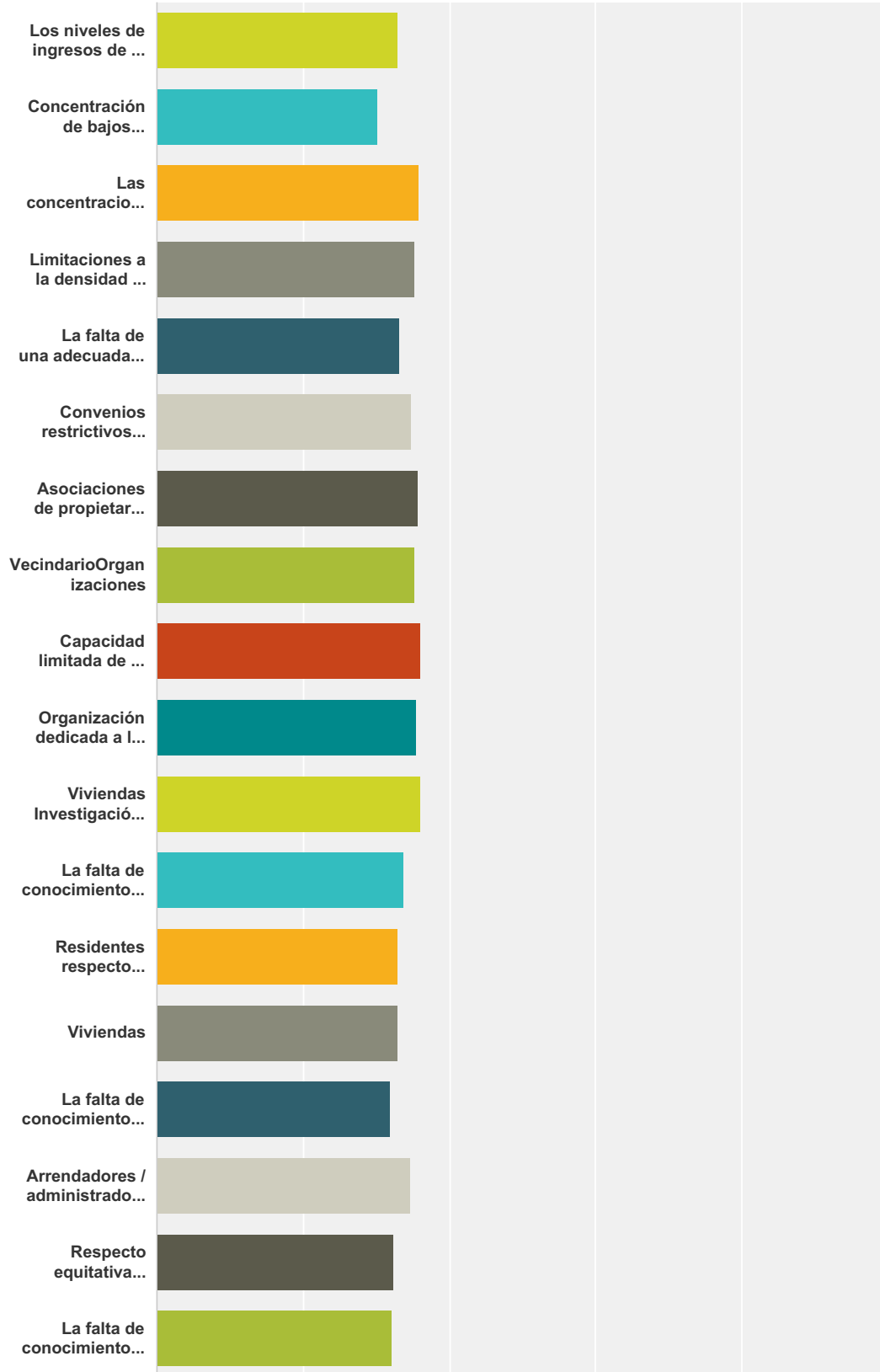
Answered: 56 Skipped: 28

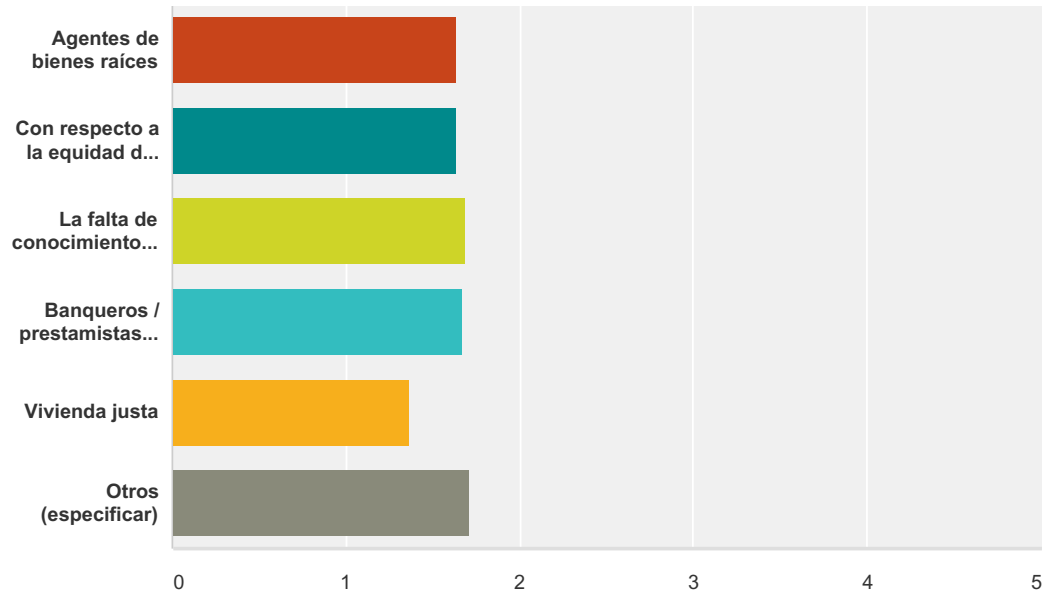


Answer Choices	Responses
Menos de 30%	8.93% 5
30%	5.36% 3
31-50%	21.43% 12
51% o más	53.57% 30
No tengo los costos de vivienda	7.14% 4
No aplicable	3.57% 2
Total	56

**Q28 Por favor seleccione si alguno de los
siguientes son las barreras a la Equidad de
Vivienda dentro de su Condado.**

Answered: 52 Skipped: 32





	Barrera	Ninguna Barrera	Total	Average Rating
Los niveles de ingresos de la minoridad Y encabezados por mujeres Hogares	34.78% 16	65.22% 30	46	1.65
Concentración de bajos ingresos Vivienda en cierta Áreas	48.72% 19	51.28% 20	39	1.51
Las concentraciones de grupo Casas en cierta Vecindarios	20.00% 7	80.00% 28	35	1.80
Limitaciones a la densidad de Viviendas	23.53% 8	76.47% 26	34	1.76
La falta de una adecuada zonificación Para viviendas prefabricadas	34.29% 12	65.71% 23	35	1.66
Convenios restrictivos por	25.81% 8	74.19% 23	31	1.74
Asociaciones de propietarios o	21.43% 6	78.57% 22	28	1.79
Vecindario Organizaciones	24.14% 7	75.86% 22	29	1.76
Capacidad limitada de un local de	19.35% 6	80.65% 25	31	1.81
Organización dedicada a la equitativa	23.33% 7	76.67% 23	30	1.77
Viviendas Investigación / ensayos	19.35% 6	80.65% 25	31	1.81
La falta de conocimiento entre	31.03% 9	68.97% 20	29	1.69
Residentes respecto equitativa	34.62% 9	65.38% 17	26	1.65
Viviendas	35.48% 11	64.52% 20	31	1.65

La falta de conocimiento entre	40.00% 12	60.00% 18	30	1.60
Arrendadores / administradores de propiedades	26.67% 8	73.33% 22	30	1.73
Respecto equitativa Viviendas	37.93% 11	62.07% 18	29	1.62
La falta de conocimiento entre	38.71% 12	61.29% 19	31	1.61
Agentes de bienes raíces	36.36% 12	63.64% 21	33	1.64
Con respecto a la equidad de vivienda	35.71% 10	64.29% 18	28	1.64
La falta de conocimiento entre	31.25% 10	68.75% 22	32	1.69
Banqueros / prestamistas con respecto a	33.33% 12	66.67% 24	36	1.67
Vivienda justa	62.96% 17	37.04% 10	27	1.37
Otros (especificar)	28.57% 2	71.43% 5	7	1.71

#	Otro (especifique)	Date
1	Help for home repair	9/4/2014 2:25 PM
2	Need options and make it accessible to our income	9/3/2014 11:38 AM

Q29 Por favor use el siguiente cuadro para proporcionar cualquier información adicional que usted cree que son las necesidades que deben ser abordados por el de la su Condado en cuanto a cuestiones de vivienda en la comunidad.

Answered: 6 Skipped: 78

#	Responses	Date
1	53038 - Help for payments to those that are refused are persons who actually need it.	9/4/2014 11:35 AM
2	Food Shops	9/4/2014 10:24 AM
3	Racism in police of the county	9/3/2014 2:42 PM
4	More child care centers	9/3/2014 11:26 AM
5	develop program and help more people to obtain housing	9/3/2014 11:03 AM
6	Lawyers for the community low income Help with healthcare / dental even free or low cost.	9/3/2014 9:49 AM

Appendix VII
FHEO Checklist

Analysis of Impediments Checklist

Recipient/Grantee: Waukesha County, WI

AI Completed By: WFN Consulting (on behalf of Grantee) (e.g. Recipient/Grantee, fair housing service provider, etc.)

AI Reviewer: Grantee Self-Review

Date(s) of the Analysis of Impediments: November 2014

In the table below, provide the amount of all grants that the grantee is applying for under this Consolidated Plan. If this is a Regional AI, list the names of all grantees cooperating in this joint AI and the amount of their grants. Show the lead grantee on the top line.

All Jurisdictions Cooperating in this AI	Type of Grant and Amount					
	CDBG	HOME	ESG	HOPWA	Other (Specify)	Total
Waukesha County, WI	TBD	TBD	NA	NA	NA	TBD

Amount of Total HUD Grants allocated to fair housing services: TBD

Amount of Total Grants from other sources allocated to fair housing services: TBD

Total Amount allocated to fair housing services: TBD

% of total funding from all sources allocated to fair housing services: TBD

Are any of the grantees cooperating for this AI under a finding of noncompliance under Title VI of the Civil Rights Act, Section 109 of the Housing and Community Development Act, Section 504 of the Rehabilitation Act of 1973, or the Fair Housing Act, and the letter of findings, charge, or lawsuit ***has not been resolved*** to HUD's satisfaction?

Yes _____

No X

If yes, provide details:

N/A

NOTE: Provide full applicable detail for any question, in the last column or on separate paper.

Element	Y/N/NA	Source/Comments
1. Has the AI been updated in the last five years?	Y	Previous version dated January 29, 2009
2. Does the AI address racial and/or national origin segregation?	Y	See pages 52-64
3. In State AIs, has the State required that its sub-recipients conduct AIs?	N/A	
4. Does the AI cover a regional or metropolitan area?	Y	Covers Jefferson, Ozuakee, Washington, and Waukesha Counties
5. Does the Grantee address actions to ensure that all available affordable housing, both in rental and ownership forms, are available for racial and ethnic minorities and persons with disabilities?	Y	See pages 160-164
6. Did the local Public Housing Agencies (PHA) and all applicable grantees coordinate their AI findings as required by 24 CFR 903.7(o)(3)(iv)?	Y	The Waukesha and Slinger Housing Authorities participated in the preparation of this AI
7. Does the Grantee conduct citizen participation with the residents of the jurisdiction, fair housing and civil rights groups, and real estate agents?	Y	See Appendix II
a. Does the grantee summarize the comments received in the AI?	Y	See Appendix III
b. Did the grantee communicate with LEP populations and persons with disabilities in alternative formats, when needed?	Y	Public survey was made available in Spanish and received 84 Spanish responses (see Appendices 5 and 6); Public notices included information for requesting special accommodation (see Appendix II)

Element	Y/N/NA	Source/Comments
8. What sources of quantitative data does the Grantee utilize?		
a. Fair housing testing data	N	Received qualitative input from testing organization; Testing data not available
b. PHA data	N	Received qualitative input from Waukesha and Slinger Housing Authorities
c. HMDA data	Y	See pages 118-127
d. Surveys, studies, housing discrimination statistics	Y	See Appendices 5 and 6 for community survey; See Appendix 4 for housing discrimination complaint statistics
e. Census data	Y	Throughout document
f. Local hate crime data	Y	See pages 138-140
g. Local transportation/school data	Y	See pages 77-79 and 83-88
h. Foreclosure rate by race and national origin	N	Local foreclosure rates not available by race and national origin
i. Section 3 data	N/A	
j. Lead-based paint data	N/A	
k. Other (Specify)	N/A	
9. What sources of qualitative data does the grantee utilize?		
a. Interviews	Y	Charrette held August 11-13, 2014
b. Observation	Y	Community tours conducted during charrette
c. News Stories	Y	Review of any applicable news stories throughout project engagement
d. Other (Specify)	N/A	
10. Is the data complete and has it been appropriately collected, analyzed, and interpreted to support the conclusions reached?		
a. Are the identified impediments supported by data?	Y	Key support for each impediment is summarized following identification of the impediment
b. Do the data indicate that there are additional unidentified impediments?	N	
c. Are there data that lead to different conclusions than those indicated?	N	

Element	Y/N/NA	Source/Comments
11. Does the AI identify impediments to fair housing choice based on race, color, religion, sex, national origin, disability, and familial status in obtaining access to housing opportunities in non-minority communities?	Y	Impediments 1, 3 and 4 and their related recommendations address the need to expand housing opportunities throughout the four-county area
12. Does the AI address impediments where minorities were treated unfairly while seeking HUD assisted housing, public housing or in the use of Housing Choice Vouchers?	N/A	No such impediments were detected
13. Does the Grantee discuss if there are PHAs and other housing providers in its jurisdiction that have policies and practices with respect to tenant selection and assignment, reasonable accommodation, delivery of services and maintenance, and accessibility that create discriminatory effects?	Y	Discriminatory effects were not noted in regard to PHA policies
14a. Does the AI analyze the existence of or lack of affordable housing choices outside areas of minority concentration?	Y	See the discussion of protected classes and Impediments 1, 3, and 4
14b. Does the Grantee address if there are any local laws, public policies, zoning, land use regulations, practices and procedures in the jurisdiction that affect members of the protected classes under the Fair Housing Act or restrict the development of housing? Are steps considered for addressing these constraints?	Y	See Land Use & Zoning Analysis (pages 93-117) and Impediment 1
15. Does the Grantee address its jurisdiction's long-term transportation plans?	Y	See pages 77-79 for discussion of local transportation systems
16. Does the Grantee consider the location, demographics, and quality of public elementary schools in relation to their proximity to housing opportunities?	Y	See pages 83-88 for discussion of school locations, demographics, and quality; See pages 89-92 for access to opportunity related to school proficiency

Element	Y/N/NA	Source/Comments
17. Are other local amenities reviewed and determinations made as to their relevance to affirmatively furthering fair housing?	Y	See discussion of Access to Opportunities on pages 89-92; See also Impediments 3 regarding jobs centers and housing
18. Are environmental and infrastructure issues appropriately addressed, with data collected, analyzed, and conclusions drawn?	Y	See pages 79-82
19. Does the local jurisdiction or the State have a law that is substantially equivalent to the federal Fair Housing Act?	Y	See Wisconsin Open Housing Law discussion on page 148
20. Does the Grantee describe the extent of fair housing services in its jurisdiction?	Y	See pages 128-129
21. Does the AI include a discussion of the fair housing/civil rights complaints and lawsuits within the geographical boundaries of the Grantee?	Y	See pages 148-159
22. Is the AI integrated into the Consolidated Plan?	Y	See 2015-2019 Consolidated Plan Goal #8 (fair housing services/fair housing education and outreach); See 2015 Annual Action Plan project list (AP-35) which allocates funds to Metropolitan Milwaukee Fair Housing Council
23. Do the AI's findings conform to those of the Consolidated Plan and the actions of the AAP and CAPER?	Y	See 2015-2019 Consolidated Plan priorities regarding affordable housing development and economic development/community revitalization in NRSA areas

Impediment	Proposed Actions/ Timeline	Funding Allocated To Overcome Impediment
<p>24. Has the grantee identified appropriate actions to eliminate the identified impediments?</p> <p>a. If so, show on the table, what actions have been identified for each impediment and any impediment for which appropriate actions have not been identified.</p> <p>b. What funding has been allocated to implement the actions that will aid in the elimination of these impediments? Show the amount allocated to actions for each impediment and whether the amount is realistic for addressing each of these impediments.</p> <p>c. Are strategies and goals to overcome identified impediments coupled with realistic timeframes and dates by which to accomplish the actions to overcome the impediments? If so, show on the table, what actions have been identified for each impediment and any impediments which appropriate actions have not been identified.</p>	<p>See pages 160-164</p>	<p>See 2015-2019 Consolidated Plan and Annual Action Plan for Year 1</p>

Element	Impediments Unidentified in AI	Major Impact on Protected Classes
25. Based upon your knowledge of the community/ies, are there impediments to fair housing choice within the jurisdiction(s) that have not been identified by the grantee in its AI?	No	
a. List impediments that have not been identified in the AI and specify which of these have major impact on which protected classes.	N/A	
26. Was the AI signed and dated by the appropriate elected official?	----	