

AMENDMENT TO WAUKESHA COUNTY'S CONSOLIDATED PLAN, 2025-2029



Amended Boundaries of Neighborhood
Revitalization Strategy Areas

Abstract

The amendment seeks to redefine the geographic boundaries of the NRAs to include additional census blocks exhibiting demonstrable need for targeted community development interventions.

Executive Summary

Waukesha County's Division of Community Development coordinates the Community Development Block Grant (CDBG) program, and together with community partners in the City of Waukesha, has made substantial progress in supporting revitalization of older established and distressed neighborhoods by serving as a catalyst for community reinvestment. Through the U.S. Department of Housing and Urban Development's Neighborhood Revitalization Strategy Areas (NRSA) designation with Phoenix Heights, Haertel Field, and the West Side, community organizations have been engaged in successful revitalization efforts since 1999 with a focus on improving housing with new construction and rehab, crime prevention, natural amenities, transportation and public services.

At this time of submitting the new Consolidated Plan, The Waukesha County CDBG Board recommends NRSA boundary changes would follow the Consolidated Plan amendment process found in 24 CFR 91.505 to submit an amended NRSA(s) that is identified as the Prairieville NRSA.

This report proposes expanding and combining the NRSA boundaries to include adjacent areas facing similar socioeconomic challenges to one larger area identified as the Prairieville NRSA (Figure 1). This name also serves as a tribute to the area's village that was incorporated in 1846, prior to becoming the City of Waukesha in 1896. This expansion and combination of existing NRSAAs removes barriers to enhancing community and economic development opportunities, leveraging additional federal and private investments, and aligning with broader housing and economic goals of the City of Waukesha and Waukesha County. The proposed larger single NRSA boundary also shares similar geographical areas the City of Waukesha's Central City Master Plan of 2012, which is also one larger area with 4 subsections, Northwest, Downtown, East and South Neighborhoods. The proposed Prairieville NRSA encompasses housing in and surrounding the downtown commercial center which also has similar aged housing stock with deferred maintenance, a higher percentage of renters, and lower than average median income than the rest of the city.

The two main goals for expanding the NRSA designation within the City of Waukesha are to increase social impacts and outcomes and to reach residents who previously did not qualify for

participating in NRSA programming because they lived slightly beyond the last NRSA border updates in 2006. The anticipated benefits of this proposed updated NRSA geography engage additional and contiguous census block areas with the highest poverty level and allow for additional opportunities for neighborhood revitalization outcomes and increased efficiencies to manage the program. A single, large NRSA helps to maximize the benefits of regulatory flexibility for organizations using CDBG funds, oftentimes another barrier to local economic development projects. All assisted housing units within the entire area also meet the Low and Moderate -Income National Objective, as well as job creation and retention activities. A single large NRSA simplifies the administrative process and makes the investment more impactful. Finally, the CDBG program has a 15% cap on the amount of funds that can be spent on public services. Having one large NRSA allows the County to target more funds toward public service to support job training, childcare, neighborhood safety programs, etc., across a larger area, dramatically increasing the intensity of social services available to all residents. This NRSA boundary update decision by the CDBG Board is now submitted as an amendment to the Waukesha County Community Development Block Grant Consolidated Plan.

Purpose of the NRSA Designation

A NRSA is a contiguous, primarily residential area with a high percentage of low-moderate income households (at least 51%). To obtain and reconfirm this designation with the U.S. Department of Housing and Urban Development, a current strategic plan must be in place that examines the changing neighborhood needs, updates strategies/priorities, and adjusts boundaries if necessary. The NRSA criteria gives flexibility to the Community Development Block Grant (CDBG) program to promote innovative programs in distressed communities. This allows for a more intensive level of services in targeted areas to stimulate revitalization and provide a foundation for economic opportunities for neighborhood residents.

In general, NRSA goals are to improve social and economic conditions, quality of life, housing, business development, and to secure additional investment. Objectives include: 1.) Connect residents to training and educational resources 2.) Link families to resources to sustain

employment 3.) Housing revitalization and homeownership 4.) Crime prevention 5.) Resident empowerment.

Successful program impact and outcomes in the NRSAs are generated by the following actions to help sustain and advance community and economic development efforts: 1.) Build stronger neighborhoods through community commitment 2.) Increase public and private investment 3.) Participation of neighborhood stakeholders to ensure economic benefits are reinvested 4.) Develop stronger networks between local government, agencies, businesses, and neighborhood groups 5.) Foster growth of resident-based initiatives to address housing, economic and service needs.

Proposed Expansion of Existing NRSAs to one larger Prairieville RSA

Waukesha County's Division of Community Development administers the CDBG and HOME programs from the U.S. Department of Housing and Urban Development. As a CDBG grantee, there are a few options to update existing Neighborhood Revitalization Strategy Areas (RSA) at the time of submitting their new Consolidated Plan. These RSA boundary changes would follow the Consolidated Plan amendment process found in 24 CFR 91.505. Grantees with NRSAs can either:

- Renew the boundaries of the NRSAs, stating there is no change
- Submit an amended RSA(s)
- Renew the term of their RSAs' commensurate with the five-year Consolidated Plan

To make an informed decision on potential RSA boundary changes, Waukesha County's CDBG Board worked with UW-Madison Division of Extension Outreach Specialists to analyze potential alternative models in coordination with the 2028 Consolidated Plan to explore a driving question: How could a change in the RSA boundaries increase economic development, housing and public services outcomes in the community?

To understand the potential changes/additions and beneficiaries with the current RSA boundaries, the following process and content was used. 1.) An analysis of economic and demographic data in the current NRSAs was conducted, reviewed and discussed. 2.) Stakeholder

input was gathered on potential NRSA boundary changes with Census Block Groups that would meet NRSA eligibility requirements and allow for expansion of revitalization efforts with eligible audiences. 3.) Potential new NRSA configurations were further discussed with the CDBG Board. 4.) An alternative NRSA boundary model was then decided upon based on eligibility requirements, potential for increased program outcomes and operational efficiencies, now recommended with this report.

This proposed expansion of Waukesha's Neighborhood Revitalization Strategy Areas (NRSA) will include additional low- and moderate-income Census Block Groups that are contiguous with the existing NRAs. The Prairieville NRSA designation, as defined by the U.S. Department of Housing and Urban Development (HUD), will enable local governments to target Community Development Block Grant (CDBG) funds in a flexible, place-based manner. The current NRAs; Phoenix Heights, Haertel Field, and the West Side, have benefited from the coordinated revitalization efforts and over the last five years, community stakeholders continued to express the need to expand these borders to better serve participants who share the same community economic challenges across the street or a half mile away. The last Phoenix Heights NRA Strategic Plan also called for the expansion of that NRA to the north to include residential areas facing economic challenges, as well as vacant lots positioned for redevelopment and another industrial area that could benefit from brownfield redevelopment (adjacent to the Phoenix Height brownfield redevelopment that spurred the 1999 designation). Expanding the NRA designated geography will allow the extension of these benefits to more households to participate in the NRA priorities and goals.

Prairieville NRA also encompasses a central city residential area. This primarily residential area surrounds and encompassing the downtown commercial center have similar housing stock with deferred maintenance, high percentage of renters, lower than average median income compared to the rest of the city, more crime, and a more diverse resident population. This general footprint aligns with the Central City Masterplan of 2012, which defines the area as a downtown neighborhood district.

Current Overview of Existing NRSAs in Waukesha County

Since the adoption of NRSA designations in Waukesha, the city has seen measurable improvement in community engagement, residential housing stock, and public infrastructure. Initiatives such as resident fostered-initiatives, housing rehabilitation grants, street and sidewalk upgrades, and youth programs have created stronger connections between city departments, organizations and neighborhoods. Lessons learned include the importance of grassroots organizing, consistent communication with residents, and leveraging partnerships with local nonprofits and institutions like UW-Madison, Division of Extension, Carroll University and Waukesha Memorial Hospital.

As of 2024, there were three non-profit organizations that maintain the Community-Based Development Organization classification to be eligible through the NRSA designated grant category with Waukesha County's CDBG program. A fourth organization, Habitat for Humanity of Waukesha County is expected to be qualified as a CDBG in 2025. These nonprofit organizations also recognized that the expansion of the NRSA boundaries will allow for increased program participation and outcomes from eligible households.

The three NRSA boundaries were created from 1999- 2006, using adjacent Census Block Groups meeting low-moderate income eligibility, primarily residential land use and stakeholder participation in the planning process. A census block is the smallest geographic unit used by the Census Bureau. In the case of the three NRSAs in Waukesha County, each NRA footprint does not follow an individual census tract which are the largest of the hierarchical geographic units defined by the U.S. Census Bureau for collecting and reporting demographic data, with populations around 1,200 to 8,000 people.

Census Block Groups are a subdivision of a census tract. This is the next smaller geographic unit, composed of multiple census blocks. Census Block Groups contain about 600 to 3,000 people. A census block is then the smallest geographic unit used by the Census Bureau. Each unit plays a role in collecting and analyzing population data, with finer granularity at smaller levels.

At the time of NRA designation, the NRSAs (Figure 1) were created using a combination of adjacent census blocks, making the NRSAs footprints unique and not uniform to one census

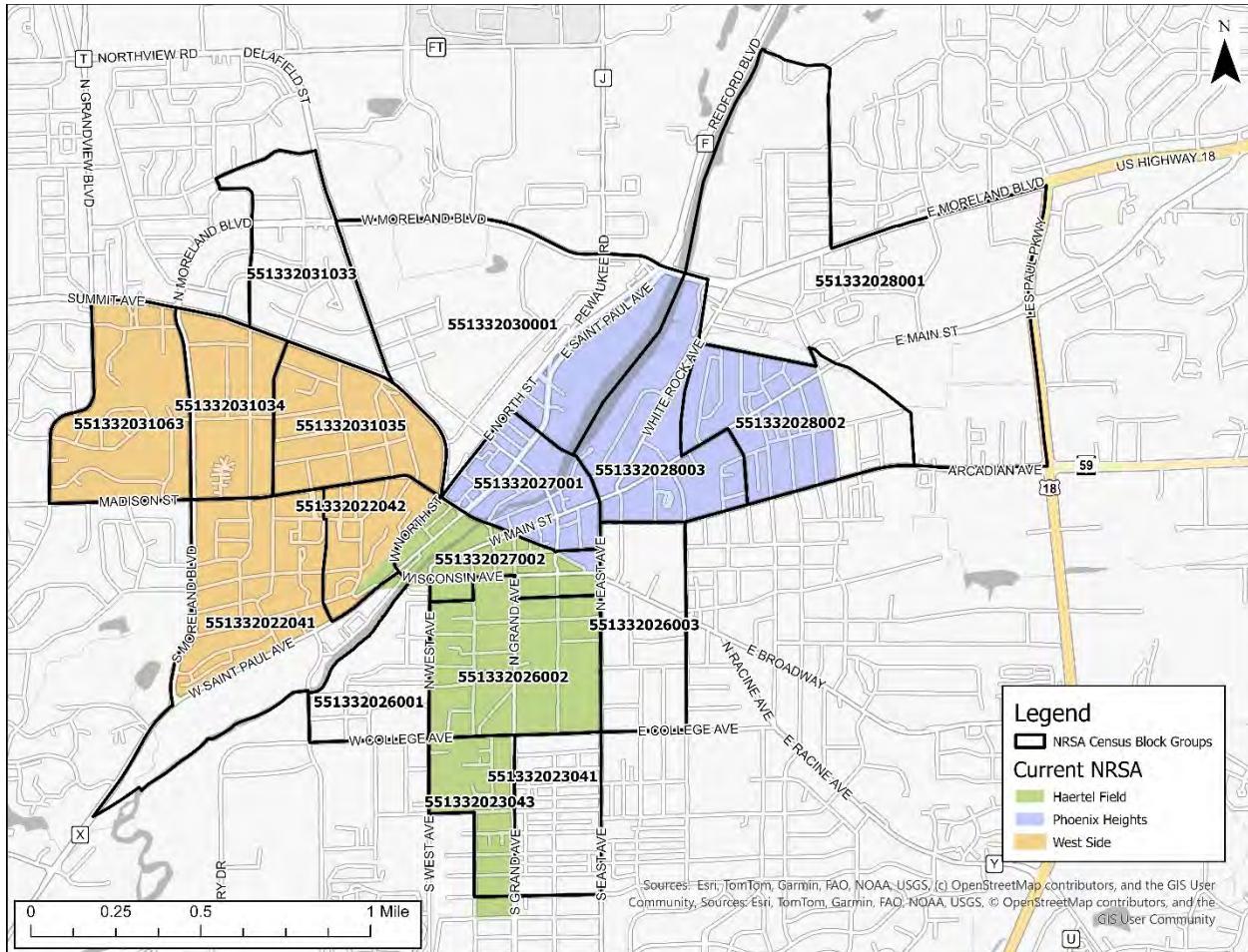
group or tract. In addition, because NRSAs must be primarily residential areas, the downtown census tract 2027 is shared between Haertel Field and Phoenix Heights NRA with mixed residential/commercial use. This area has one of its greatest needs with the highest number of low to moderate income households, yet being in the central business district, the area benefits from being included with adjacent NRSAs.

The Haertel Field NRA was established in 1999. Boundaries include part of the City of Waukesha's downtown central business district and the area south which includes Les Paul Middle School, Waukesha Public Library, part of Carroll University's campus, and the Haertel Athletic Field that the school district transferred to Carroll University in 2013. This facility is used as both a practice facility for Carroll's lacrosse, football and soccer team, as well as the youth football program. Updates to the facility were supported by a \$3,000 grant from the Green Bay Packers Foundation and a \$30,000 community development block grant. Census blocks that make up Haertel Field NRA include: 2023043, 2026002, and 2027002

The Phoenix Heights NRA was established in 2001. This area includes part of the City of Waukesha's central business district and includes residential areas north and east of the Fox River. Amenities include Waukesha East High School, Frame Park, the River Walk and numerous Habitat for Humanity residential developments and rehabbed homes. Census Block Groups include: 2027001, 2028002, and 2028003

The West Side NRA was established in 2006. This area is located west of Fox River and the City of Waukesha's central business district. Amenities include Parkview, Horeb and Dopp Park, Waukesha Memorial Hospital, Butler Middle School, Waukesha School District Administration Offices, Salvation Army and numerous churches. Census Block Groups include: 2022041, 2022042, 2031063, 2031031, and 2031034.

Figure 1: Current NRAs and Proposed Expansion with Contiguous Census Blocks



Assessment of Economic Conditions

The current NRAs are primarily residential and meet the household income criteria with median income ranging from 41% to 58% of Waukesha County's median income (Figure 2). The three NRAs also have a total population of a little over 11,000, about 16% of the City of Waukesha. (Figure 3).

Figure 2: Median Household Income in NRSAs, City of Waukesha and Waukesha County, 2024

Site	2024 Median Household Income
Haertel Field NRA	\$43,956
Phoenix Heights NRA	\$56,189
West Side NRA	\$61,069
Waukesha City, WI	\$80,810
Waukesha County, WI	\$105,037
Wisconsin	\$75,654
USA	\$79,068

Source: ESRI Community Profile

Figure 3: 2024 Total Population of NRSAs, City of Waukesha and Waukesha County

Site	2024 Total Population
Haertel Field NRA	2,828
Phoenix Heights NRA	3,422
West Side NRA	5,285
Waukesha City, WI	71,835
Waukesha County	414,287
USA	338,440,954

Source: ESRI Community Profile

The NRSAs and proposed expansion area is nearly half of Waukesha County's Median Household Income with a higher concentration of poverty. The NRSAs also have a higher concentration of renters and challenges with housing stability and limited wealth-building.

Within the proposed NRSA expanded area, residents often do not have the economic means to participate in the local consumer economy, leading to a need for targeted job training and connections to higher-wage employment outside of local retail/service sectors. Strategic priorities identified include 1.) Residential connections with sustainable employment and career pathways, 2.) Extending the life of affordable housing stock through rehabilitation, repair and weatherization, 3.) Supporting business that commit to hiring from the NRSA and 4.) Funding robust social services that remove barriers to employment.

Overall Housing Market Context for NRSAs

The housing market in the Waukesha NRSAs is characterized by a significant need for affordable workforce housing amongst a highly competitive and expensive county-wide market. Waukesha County continues to face a severe housing affordability challenge. Median home values and rents are among the highest in Wisconsin, and costs are rising faster than incomes. This pressure makes preservation and expansion of housing in the NRSAs particularly vital. The NRSA designation allows the County to leverage CDBG dollars to fund specific revitalization objectives that include housing rehabilitation and homeownership programs, which are key to stabilizing the existing housing stock.

The severe affordability gap concentrated in the NRSAs makes residents highly vulnerable to rising housing costs and displacement. Overall, the Waukesha housing market is a seller's market with low inventory, competitive bidding and rising prices. The intense market pressure makes it challenging for Low to moderate income households to purchase a home even at lower price points. The NRSA designation allows for increased targeted investment of CDBG and HOME funds directly to these areas for activities like homeowner rehabilitation programs and downpayment assistance, both essential tools for stabilization.

The housing market within Waukesha's NRSAs is also a microcosm of the affordability crisis across the nation. While the underlying values of homes in the NRSAs are lower than

surrounding area, market demand is fierce, which pushes prices up and shrinks the inventory of entry-level and affordable housing. Success of the NRAs will rely heavily on sustained, targeted investment to preserve the existing housing stock and empowering of NRA households. To review the City of Waukesha's 2024 Housing Affordability Report: https://webfile.waukesha-wi.gov/waukeshawi25/Document_Center/Government/Community%20Development/Economic%20Development/Housing%20Affordability%20Analysis/2024%20Housing%20Affordability%20Analysis%20Combined.pdf?t=202506170915160&t=202506170915160

Comparison of NRAs with Waukesha County Benchmark Counties

In Wisconsin, Waukesha County's benchmark counties include Brown County, Dane County, Racine County. Brown County has a Thriving Neighborhoods Initiative, and in partnership with Brown County United Way, they have identified four neighborhoods (Downtown, Joannes Park Navarino and Whitney Park) to target investment for strengthening under-resourced, at-risk and vulnerable areas. In Racine County, the 2017-2019 Greater Uptown NRA strategic plan was adopted in the City of Racine. In Dane County, the Town of Madison adopted a NRA plan in 2001 that focused on census tracts 1401 and 1502.

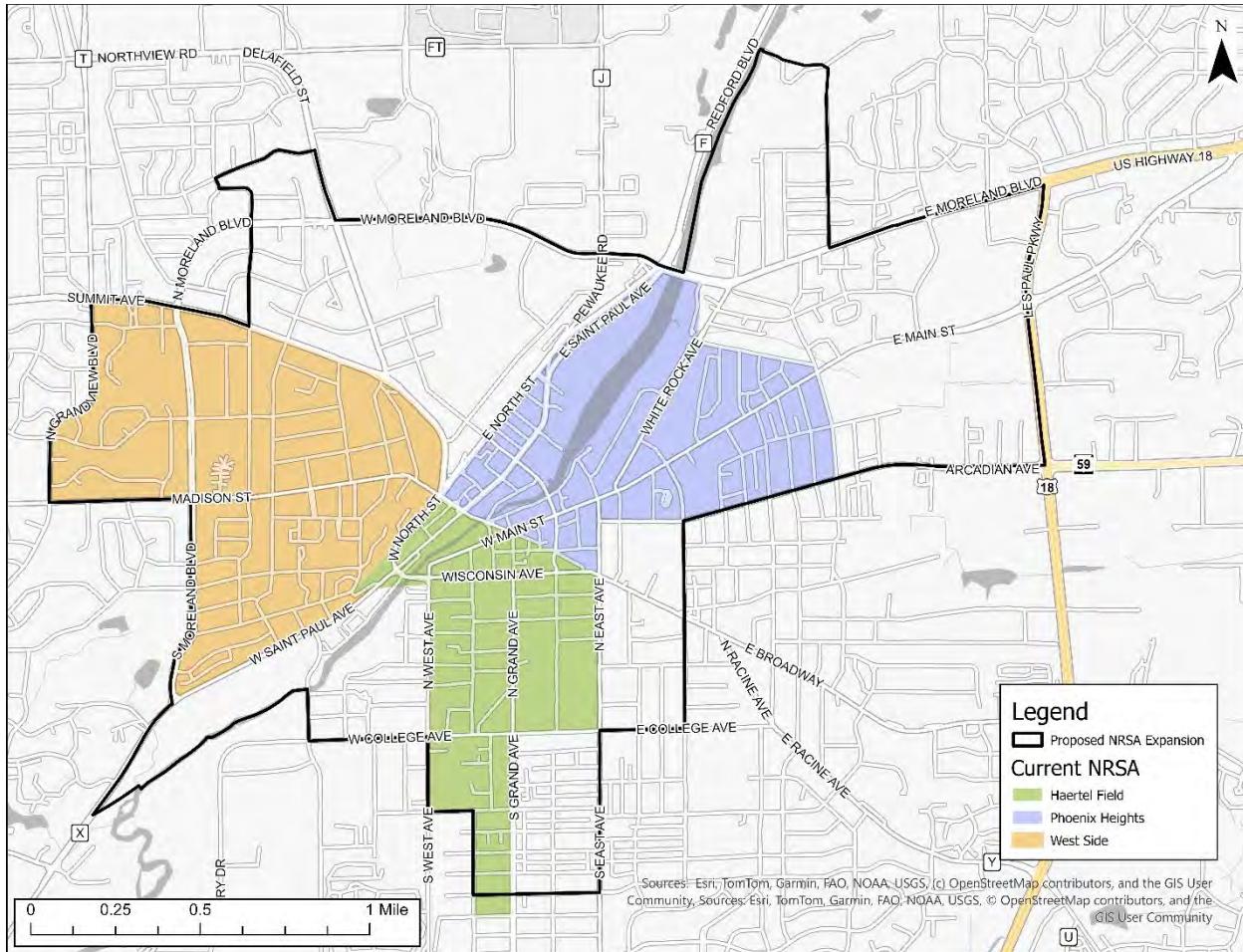
Waukesha County's benchmark counties outside of Wisconsin include Fairfax County, VA, Oakland County, MI and Dakota County, MN. Fairfax County, VA does not have a NRA program, yet revitalization is a major component of an overall economic viability strategy with older retail and business centers. Eight areas of focus in Fairfax County were engaged with the Department of Planning and Development's strategic redevelopment and investment opportunities in older commercial areas. Oakland County, MI does not have NRA designations with the CDBG program. The City of Detroit had five NRAs as of 2021. Dakota County, MN does not have any NRAs. Dakota County Community Development Agency, local government agency with mission to improve the lives of residents and enhance the economic vitality of communities through housing and community development. This is done by administrating over 30 programs and managing over 2,900 affordable housing units.

Community Consultation for Proposed Prairieville NRSA Designation

Previous stakeholder input was applied from the most recent NRSA strategic planning sessions. That included working with a planning team from each NRSA, engaging stakeholders in surveys, interviews, focus groups. The stakeholder input from 2017, 2021 and 2022 was used to inform priority issues, goals and strategies throughout the NRSA. Overtime, conversations with residents neighboring the NRSA boundaries demonstrated interest in participating in shared NRSA goals and programs. For the purpose of this proposed NRSA boundary expansion, input was gathered from residents and organizations from the NRSA, as well as organizations who serve a specific role working with or Without CDBG support for Neighborhood Revitalizations such as Waukesha Memorial Hospital, ACAP, Habitat for Humanity, City of Waukesha Community Development & Parks and Recreation, Dental and Health Clinic, Carroll University, Tower Hill Neighborhood Association, Inc., and the Waukesha County Community Development Block Grant Board of Directors.

Recent community surveys, listening sessions, and input from neighborhood groups and organizations continue to highlight concerns about housing affordability, safety, youth programming, and access to services. Residents have expressed strong interest in participating in neighborhood planning and revitalization, indicating readiness for inclusion in the NRSA framework. Often the NRSA boundaries had a negative indirect impact that resulted in residents experiencing similar challenges not being able to fully participate in programs and initiatives due to their residence across the street, or a few blocks outside the NRSA boundaries (Figure 4).

Figure 4: Proposed Prairieville NRSA Expansion with Scale



Beginning in the summer of 2024, stakeholder input and potential changes were gathered and discussed from the current NRSA boundaries to build on previous needs assessments conducted for updating the NRSA's eligibility. To gauge a systems perspective of the existing NRSA's position for achieving intended outcomes, a group of residents, organizations, community and city leaders who engage with programming in the NRSA's were surveyed and interviewed.

NRSA stakeholder consultation was obtained through a survey instrument that was developed and shared with community partners, organizations and residents in the area. In addition, resident-based groups were engaged for feedback on the proposed boundary changes. The intent was to engage their thoughts and perspectives on updating the NRSA boundaries.

In the NRSA survey, a map was provided asking which of the Census Block Groups in the City of Waukesha would benefit from neighborhood revitalization efforts? Survey results helped to focus potential areas for NRSA boundary expansion. From our sample of 16 NRSA program stakeholder respondents of organizations that the NRSA program directly impacts, the following summary results were identified.

When asked how well the current boundaries allow for addressing the disadvantaged areas' needs in the community, respondents shared an average score of 'slightly well' (2 of 5) for each category: 1.) Economic development opportunities 2.) Housing needs of residents in the area 3.) Public service needs 3.) Job creation or retention.

When asked which Census Block Groups should be considered for a NRSA designation, based on awareness of program needs and potential benefits, the proposed Prairieville NRSA expansion areas were identified by most of the survey participants. For census blocks selected in the 40-50% Low to Moderate Income range, being included with an adjacent census block with higher percentage of Low-Moderate Income households could include these areas for a shared total to meet land use and income requirements.

Numerous comments also focused on undeveloped land and potential redevelopment sites to address housing challenges within the census blocks suggested for the NRSA expansion.

Additional feedback included the ongoing efforts to engage stakeholders in NRSA programming to inform priority goals and objectives. This has helped the NRAs to remain compliant with updating strategic plans and working with stakeholder planning teams to discuss data on demographic, economic and community changes, as well as needs and opportunities. NRSA planning teams also appreciate learning about the identified trends in changing demographics, the analyzed economic data and identified/prioritized data used to better understand challenges and concerns through community consultation with area residents, organizations, business operators and community groups. Detailed consultation of previous processes is documented in the following plans: West Side NRSA Strategic Plan, 2023-2027; Haertel Field Strategic Plan, 2022-2026; Phoenix Heights Strategic Plan, 2017-2022

Eligibility for NRSA Expansion: Demographics and Land Use Analysis

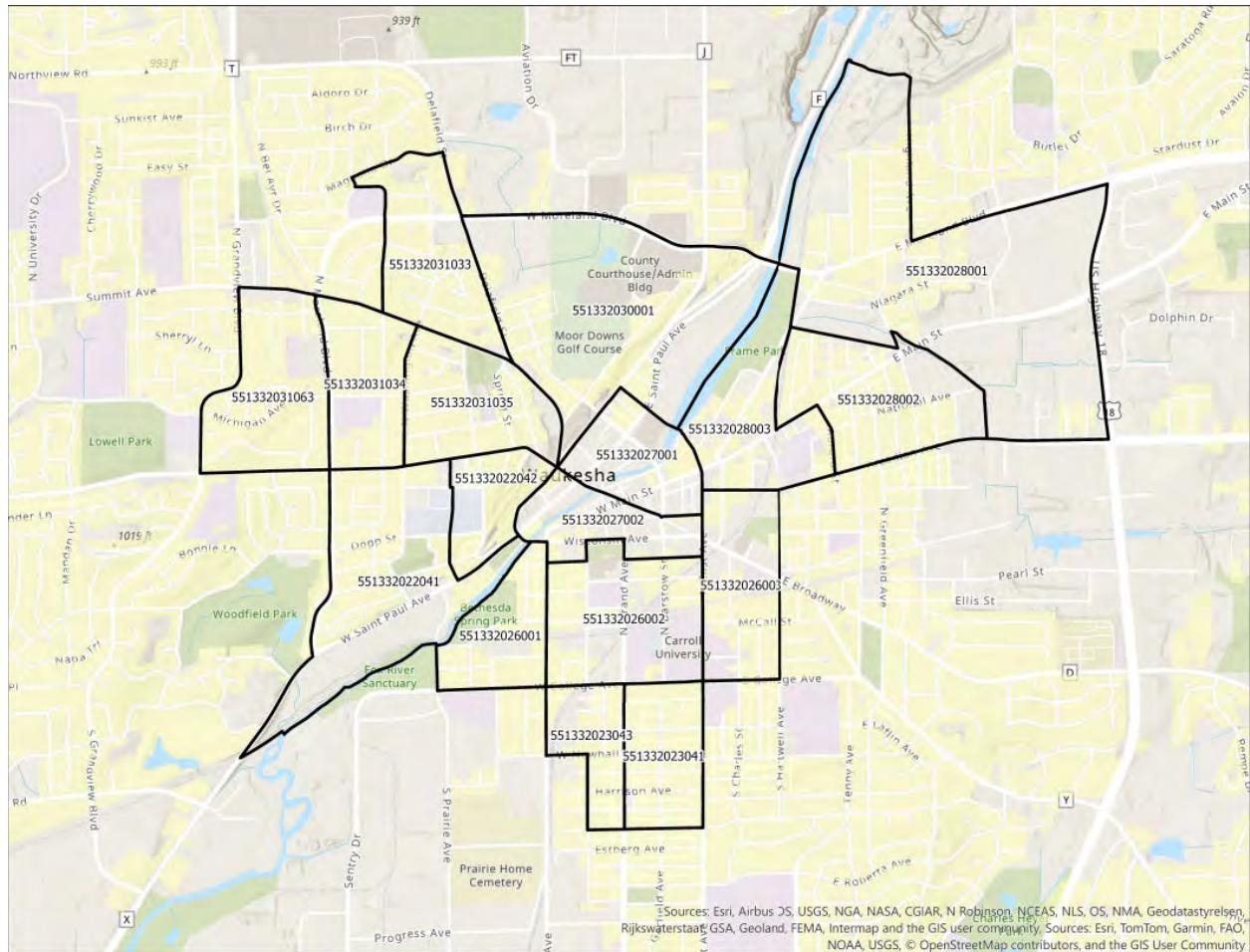
Data from the U.S. Census and local sources indicate that several adjacent neighborhoods share similar indicators of need with current NRSA areas. These include median household incomes below 80% of the area median income, elevated unemployment rates, aging housing stock, and a higher concentration of renters (Figures 5 & 6). The proposed Prairieville NRSA is highlighted in the map below using the updated combination of NRSAAs and expansion with neighboring block groups also eligible for NRSA designation. (Figure 6, Appendix B)

Figure 5: Demographic Profile of Proposed Prairieville NRSA with 2024 ESRI Forecast

2024	Prairieville NRSA	City of Waukesha	Waukesha County, WI	Wisconsin
Population	18,110	71,835	414,287	5,945,274
Median Age	35.9	38.5	43.9	40.6
Median Household Income	\$56,800	\$80,810	\$105,037	\$75,654
Diversity Index	64.6	54.5	34.1	45.4
Population 25+ with Bachelor's Degree	22%	31.30%	32.70%	22.40%
Population 16+ Employed	97.60%	98.00%	97.80%	97.40%

Source: ESRI Community Profile

Figure 6: Proposed Prairieville NRSA, a Combination of 17 Census Block Groups to Establish One NRSA Designation in Waukesha County



The proposed Prairieville NRSA also meets HUD's threshold for low/moderate-income designation with the 17 contiguous block groups having a collective total over 57% low-moderate income. (Figure 7)

Figure 7: Proposed Prairieville NRSA Low-Moderate Income Households Block Group Total

BLOCK GROUP	TRACT	BLKGRP	LOW	LOWMOD	LMMI	LOWMODUNIV	LOWMOD_PCT
551332022041	202204	1	270	675	770	985	68.50%
551332022042	202204	2	150	615	795	870	70.70%
551332023041	202304	1	160	315	390	690	45.70%
551332023043	202304	3	315	460	525	530	86.80%
551332026001	202600	1	150	330	380	720	45.80%
551332026002	202600	2	780	900	1,635	1,665	54.10%
551332026003	202600	3	225	270	310	460	58.70%
551332027001	202700	1	335	525	760	890	59.00%
551332027002	202700	2	385	530	555	655	80.90%
551332028001	202800	1	450	730	1,540	1,805	40.40%
551332028002	202800	2	235	535	760	1,250	42.80%
551332028003	202800	3	620	935	1,160	1,290	72.50%
551332030001	203000	1	350	625	800	945	66.10%
551332031033	203103	3	75	340	515	815	41.70%
551332031034	203103	4	685	940	1,230	1,305	72.00%
551332031035	203103	5	440	585	660	970	60.30%
551332031063	203106	3	320	550	700	1,250	44.00%
TOTAL				9860		17,095	57.67%

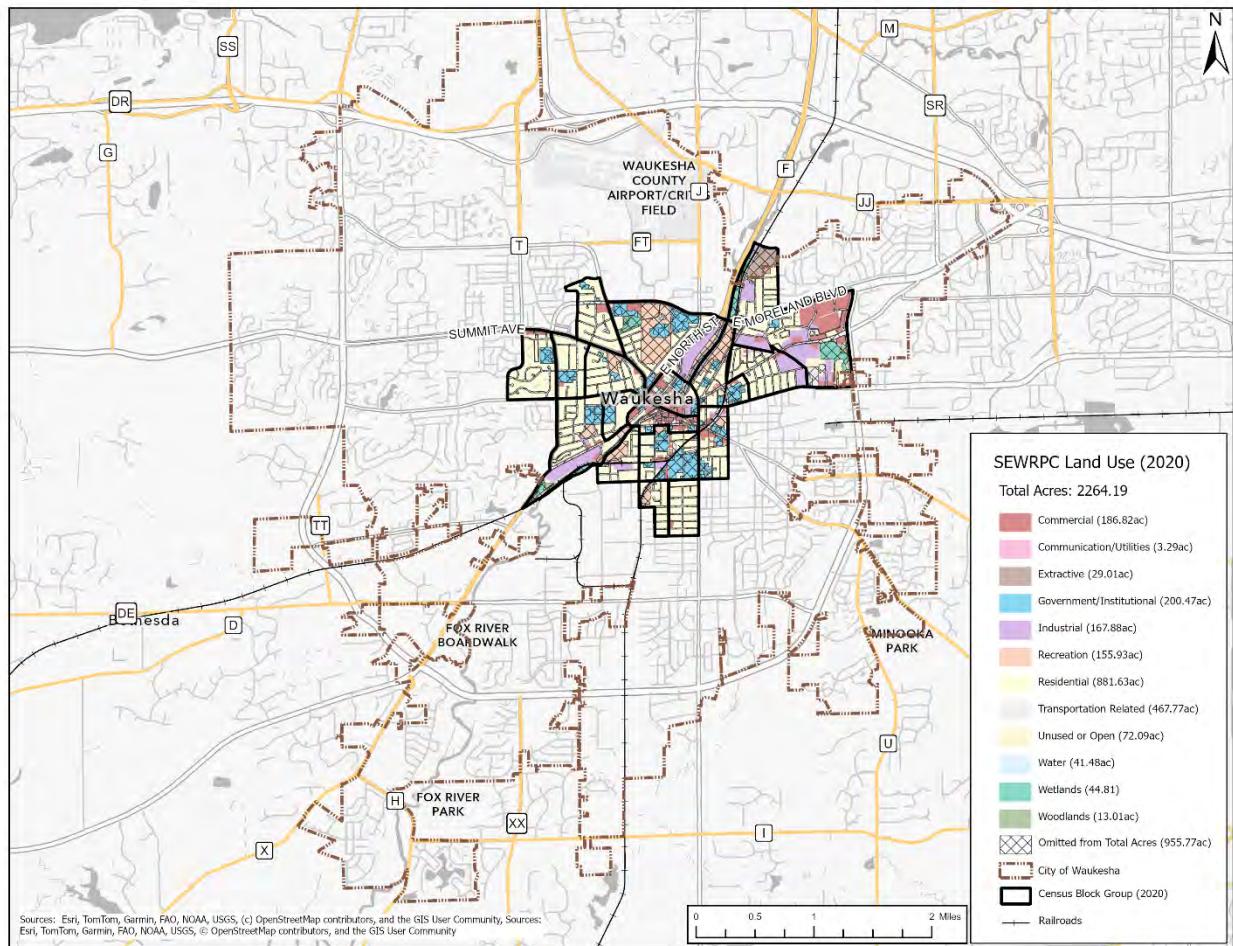
Source: U.S. Census Bureau, 2023 American Community Survey 5-Year Estimate

The proposed Neighborhood Revitalization Strategy Area (NRSA) in the City of Waukesha encompasses 17 contiguous census block groups with a total area of 2,264.2 acres. To focus the NRSA boundary primarily on residential and developable areas, a refined measure of land use

was calculated using buildable acres. Buildable acres include Industrial, Commercial, and Residential land uses, but exclude water bodies, woodlands, parks and recreation areas, stone quarry extraction sites, transportation infrastructure, and Government and Institutional uses.

Within these 17 block groups (see Figure 8 & 9), the total residential land use accounts for 881.7 acres. Comparing the buildable land uses (Industrial, Commercial, and Residential), Residential land use is the primary type, constituting 61.4% of the total buildable acres in the recommended NRSA boundary. This boundary also contains an additional 72 acres of open or unused land.

Figure 8:



These 17 contiguous block groups, which strategically expand existing NRSAs, demonstrate significant CDBG eligibility criteria. The area has a population exceeding 17,000 and a low-to-moderate income (LMI) percentage of 57.67% (see Figure 7). This substantial LMI concentration and population size confirm the area's need for targeted investment under a HUD CDBG-supported NRA designation.

Figure 9: Proposed Prairieville NRA Land Use Summary by 17 Contiguous Block Groups

CLASSIFICATION	SUM_ACRES
Commercial	186.8224137
Communication & Utilities	3.28856479
Extractive	29.01362657
Government & Institutional	200.4731461
Industrial	167.8772531
Recreation	155.92714
Residential	881.6309744
Transportation Related	467.766464
Unused or Open	72.09433358
Water	41.47509935
Wetlands	44.80802923
Woodlands	13.01369108
TOTAL	2264.190736

Source: Waukesha County Land Information System, 2025

According to the Southeastern Wisconsin Regional Planning Commission's (SEWRPC) 2020 Land Use Plan, the additional proposed Census Block Groups will add approximately 45 acres (44.644ac) of "open/unused" space, adding to the existing NRSA's 27.5 acres (27.451ac).

SEWRPC's open/unused land use designation does not differentiate between open "buildable" space and features such as retention ponds, open/unused parking lots or open lots. Although unlikely all acres are "buildable", additional acreage for development or redevelopment can be identified within other land use designations. For instance, the proposed additional Census Block Group 551332028001 (abbreviated as 8001), has approximately 33 acres of open/unused space without considering vacant industrial or commercial lots. Adding block group 8001 to the existing Phoenix Heights NRSA would create continuity between a 17+ acre area bounded by Niagara Street (north), Cleveland Avenue (east), Perkins Avenue (south), and Whiterock Avenue (west), and parcels at the intersection of E Main Street and Cleveland Avenue where SEWRPC has designated open/unused parcels. Looking forward, Waukesha County's Land Use Plan for 2050 designates the same 17+ acres as "Mixed Residential/Commercial (MRC)". This change in land use designation as compared to SEWRPC's land use shows the County's intent to construct new dense residential spaces where there was once industrial space in block group 8001.

Expanding, and accepting the proposed Prairieville NRSA, reveals similar opportunities at the intersection of Delafield Street and Moreland Boulevard (block groups 551332031033 & 551332030001). Extending the NRSA boundaries aligns the goals and objectives of the NRSA with the County's commitment to developing residential space as indicated in the County's 2050 Land Use Plan, while also providing additional community resources and opportunities for residential feedback as the County pivots land use designations.

The differences between SEWRPC's land use codes and Waukesha County's land use codes are worth noting. Previous analyses using SEWRPC land use codes overlook the reality of mixed-use development where Waukesha County's 2050 Land Use Plan (and codes) reveal higher concentrations of residential space in commercial corridors as growth in three-dimensional space is accounted for. The result of utilizing SEWRPC's low-density, two-dimensional traditional land use codes leads to under-reporting of residential space, particularly in downtown areas. Appendix C compares SEWRPC's 2020 Land Use Plan with Waukesha County's

2050 Land Use Plan with acres per block group dedicated to land use types. If SEWRPC and the County shared the same land use codes, the anticipated residential percentage increase from the 2020 plan to the 2050 plan would look extraordinary and the change in commercial land use would look disappointing in the following block groups:

551332026002, Residential increase of 13.18%, Commercial decrease of -5.07%

551332027001, Residential increase of 25.83%, Commercial decrease of -28.79%

551332027002, Residential increase of 38.35%, Commercial decrease of -31.82%

551332028003, Residential increase of 13.54%, Commercial decrease of -5.87%

551332030001, Residential increase of 11.58%, Commercial decrease of -2.83%

The wide differential of residential and commercial space uncovers a bias towards commercial spaces within the City of Waukesha's downtown when comparing SEWRPC's 2020 Land Use Plan and the County's 2050 Land Use Plan since the SEWRPC Land Use only accounts for one of two land uses per parcel. Adjusting to the County's mixed-use residential/commercial code (MRC), the increases below are more likely:

551332026002, Residential increase of 8.11%

551332027001, Residential increase of -2.96%

551332027002, Residential increase of 6.53%

551332028003, Residential increase of 7.66%

551332030001, Residential increase of 8.75%

The exercise of comparing SEWRPC and the County's Land Use codes overtime is illustrative. First, the original three NRSA neighborhoods have "already existing" mixed residential and commercial space where residential space was likely under-represented in a built environment with few opportunities to grow, except vertically. Showing this under-representation reveals the potential for civic engagement and residential stakeholder input in the proposed block groups for the NRSA expansion where the County anticipates new mixed-use residential and

commercial construction. The “commercial bias” does not necessarily exist. Therefore, the above example of the original NRSA neighborhoods’ extraordinary gains in residential space and gains in commercial space are realistic. Through re-zoning and redevelopment, the County has shown their commitment to increasing the City of Waukesha’s access to housing; establishing the Prairieville NRSA will facilitate interactions with all stakeholders where the County is pursuing residential and commercial development.

Residential Code Violations and Permits

To further demonstrate the benefits of expanding the NRSA to the proposed Prairieville NRSA footprint, residential code violations and building permits are included as critical indicators that help assess the need for investment in existing housing. These data sets provide tangible evidence of distress in the community as a signal of property deterioration with delayed maintenance as well as health and safety risks that affect residents’ well-being. A higher violation count can also suggest lack of means to maintain housing stock, often due to limited income or absentee landlords. The proposed Prairieville NRSA has about 30% of the City of Waukesha’s housing units (Figure 10). From 2015-2024, we see nearly 50% of the City’s total code violations reported in the 17 block groups that make up the proposed Prairieville NRSA. (Figure 11, Appendix A)

Figure 10: Household Profile of Proposed Prairieville NRSA with 2024 ESRI Forecast

2024	Prairieville NRSA	City of Waukesha	Waukesha County	Wisconsin
Total Households	8,431	30,760	169,2,482,060	
Housing Units	8,985	31,974	177,438	2,789,009
Owner Occupied	37.70%	56.80%	71.70%	59.50%
Renter Occupied	56.10%	39.40%	23.70%	29.50%
Vacant	6.20%	3.80%	4.40%	11%
Median Home Value	\$258,654	\$331,947	\$422,461	\$296,463

Source: ESRI Housing Profile

Figure 11: Residential Code Violations by Year and Proposed Prairieville NRSA Block Groups

Geographic Area												Total
	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024		
551332022041	19	17	7		7	14	2	30	33	16	145	
551332022042	19	13	9	5	3	13	2	5	46	10	125	
551332023041	46	23	52	4	31	22	45	29	50	43	345	
551332023043	31	40	79	11	16	13	59	12	53	10	324	
551332026001	13	15	23	12	14	51	25	21	43	48	265	
551332026002	64	33	67	21	21	22	39	22	21	48	358	
551332026003	25	36	44	11	37	16	17	9	17	10	222	
551332027001	6	3	26	5	0	0	7	1	1	11	60	
551332027002	22	14	10	8	8	18	12	5	12	4	113	
551332028001	25	22	18	36	53	10	19	24	30	20	257	
551332028002	23	23	17	11	19	35	34	107	97	42	408	
551332028003	25	35	40	6	26	64	11	22	42	54	325	
551332030001	30	24	22	15	24	10	11	36	49	50	271	
551332031033	12	11	7	15	3	8	4	5	1	9	75	

551332031034	46	27	13	2	13	26	10	2	5	15	159
551332031035	27	36	17	6	26	11	23	2	47	18	213
551332031063	28	6	12	1	4	11	6	2	8	10	88
Waukesha*	555	620	311	210	374	353	335	337	397	404	3896
City of											
Waukesha*	1016	998	774	379	679	697	661	671	952	822	7649

Source: City of Waukesha Community Development Department, January 2025

Residential building permits are also a critical indicator when assessing community investment to help demonstrate confidence and reinvestment. Permit activity reflects whether the property owners are reinvesting in repairs, renovations or additions. This is also an economic health indicator, where low levels could suggest a lack of capital or confidence in the area's future. Looking at trends over time can help illustrate ongoing decline or early stages of revitalization (Figure 12). By looking at both residential code violations and permits, there is dual evidence to strengthen the case for expanding the NRSA designation to include these adjacent block groups to highlight the need for targeted community development efforts. From 2016-2024, we see that about 17% of the City's residential permits pulled were from the proposed Prairieville NRSA's 17 block groups, which are the older housing stock, also considered the largest concentration of affordable, yet vulnerable housing with a risk of disrepair that leads to increased code violations and neighborhood decline. (Figure 10)

Figure 12: Residential Permits by Year and Proposed Prairieville NRSA Census Block Groups

Geographic										Total
Area	2016	2017	2018	2019	2020	2021	2022	2023	2024	
551332022041	6	19	17	32	27	30	35	49	38	253

551332022042	0	4	8	9	12	12	2	5	7	59
551332023041	3	22	30	16	28	48	35	57	52	291
551332023043	2	9	16	6	12	15	20	17	12	109
551332026001	2	9	9	12	4	16	15	17	14	98
551332026002	0	13	12	18	19	19	15	15	17	128
551332026003	1	9	16	10	13	23	11	31	14	128
551332027001	0	3	0	0	5	3	2	9	7	29
551332027002	0	3	8	15	5	3	8	13	11	66
551332028001	4	28	47	64	55	46	45	50	53	392
551332028002	4	15	31	52	24	48	35	55	58	322
551332028003	0	15	25	12	20	11	15	14	19	131
551332030001	1	17	29	26	18	31	19	36	43	220
551332031033	0	16	21	21	24	20	19	44	34	199
551332031034	1	7	20	15	26	11	24	36	27	167
551332031035	1	15	17	28	26	22	37	43	30	219
551332031063	3	19	15	104	28	36	36	39	38	318
Waukesha*	119	983	1552	1679	1780	2061	2087	2391	2487	15139
City of										
Waukesha*	147	1206	1873	2119	2126	2455	2460	2921	2961	18268

Source: City of Waukesha

Alignment with Strategic Goals

This Prairieville NRSA expansion also supports the City's 2040 Comprehensive Plan and the Waukesha County Consolidated Plan by addressing goals around affordable housing, neighborhood resilience, and equitable access to economic opportunity. It also complements ongoing initiatives in transportation, public health, and sustainability. Additional plans and reports around the NRSA areas include: 1.) Consolidated Annual Performance and Evaluation Report, March 2024, 2.) 2023 Annual report Open Tax Incremental Districts, 3.) City of Waukesha Central City Master Plan, 2012, 4.) City of Waukesha Comprehensive Plan, Ch 7 Land Use Element, Redevelopment Districts.

Highlights of Prairieville NRSA, a Community Recommended Expansion in Waukesha County

The proposed NRSA boundary expansion includes portions of the following areas that were selected based on demographic eligibility, community input, and physical continuity with current NRAs:

The northern residential section of the Downtown Central Business District

West, East and South residential corridors of the existing Haertel Field NRSA boundary

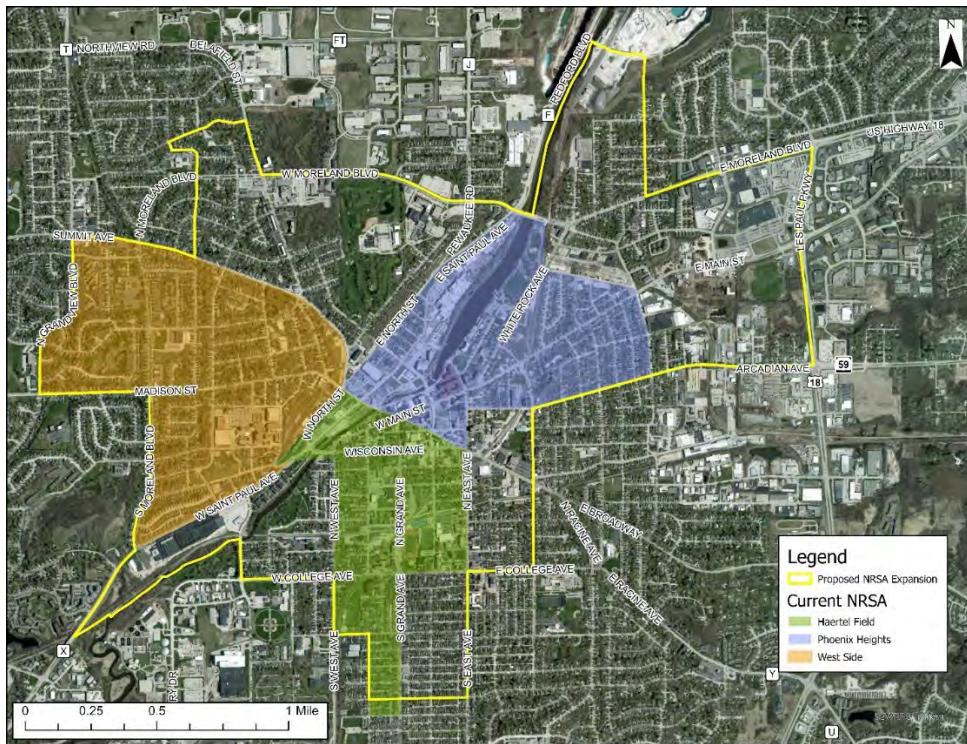
Reconnecting block groups east of Phoenix Heights NRSA

Including adjacent residential areas north and east of Phoenix Heights NRSA

Includes the neighborhood north of West Side NRSA (across the current norther boundary)

Following numerous community engagement efforts with stakeholder groups, a series of options was presented to the Community Development Block Grant Board of Directors in December 2024 for discussion of eligible areas to include and potential positive impact of expanding the NRAs to specific and contiguous block groups. After reviewing and applying Board suggestions, one larger NRSA was found to meet criteria for NRSA eligibility and decided upon (Figure 13). With this potential expansion, benefits of this amended area can allow greater impact by increasing the number of eligible households and locations to assist in working on Revitalization goals in partnership with U.S. Department of Housing and Urban Development.

Figure 13: Proposed and CDBG Board Approved Prairievile NRSA Expansion of 17 Block Groups



Prairievile NRSA Strategic Plan, 2025-2028

Goals and Objectives for the Proposed Prairievile NRSA:

Address NRSA housing challenges by strengthening residential property investment with rehabilitation, new developments and in-fill development.

Continue to support and expand 'snowballing' efforts for exterior home improvements. Also, target high visibility households along the entry to downtown and major arterials.

Maintain and improve existing housing stock through housing repair programs that build confidence in stakeholders and address exterior and major home improvement issues to increase curb appeal.

Increase community efforts with builders, lenders and families to expand programs that preserve/build/rehab housing units.

Promote incentives and opportunities for those employed in the NRSA to consider purchasing a home in the NRSA.

Plan, coordinate and conduct annual housing resource fair focusing on housing continuum (homelessness-renters-home ownership – home rehab – home permits/improvements) and to share housing resources with NRSA residents.

Initiate conversations with landlord group, elected officials, and other stakeholders to address shared concerns/challenges with rental property's conditions and nuisances and determine next steps.

Explore opportunities for land acquisition for new housing development and targeted areas for housing stock improvement (Ex: residential parcel donations to Habitat for Humanity).

Engage community stakeholders and brokers to encourage residential land use development with undeveloped parcels.

Support neighborhood empowerment initiatives for positive impact with quality of life.

Strengthening neighborhood partnerships to improve public services and safety Expand virtual neighborhood watch program (i.e., Tower Hill Ring Camera Network) by increasing neighborhood network and communication amongst neighbors and police department.

Develop an ad-hoc community team to study and identify opportunities for improving NRSA walkability, bicycle friendliness and public safety.

Ad-hoc team studies challenging areas to reduce speeding throughout main thoroughfares and residential areas.

Continue to strengthen City of Waukesha Parks Recreation and Forestry and resident partnership to address shared concerns at neighborhood parks.

Explore ways to support bike lane improvement/interconnections of existing trails.

Develop opportunities that further engage resident input in potential public/private partnership projects that will affect public spaces.

Strengthen connections and participation with newcomers and changing demographics in the neighborhood.

Increase promotion and access to youth development programs to encourage life-long wellness for youth who live in the NRSA.

Create neighborhood opportunities for residents to strengthen relationships, address shared issues or interests and conduct resident-led beautification projects. (Examples shared on survey include annual picnic, advocating for more trash receptacles, landscaping/yard upkeep, curb appeal, neighborhood identification/promotion.)

Foster a NRSA-based approach to focus on economic empowerment through resident skill development and support for locally owned enterprises.

Support development of a sustainable, formalized group to provide non-profit Community-Based Development Organization leadership to implement NRSA strategies in partnership with stakeholders.

Strengthening capacity with the Redevelopment Authority to address opportunities in the NRSAs, increasing their ability to develop a more robust voice of residents into the Common Council, and collaboration with the Community Development Department. Leverage NRSA redevelopment opportunities and tools (e.g. Tax Increment Financing, Planned Urban Development).

Engage community stakeholders and brokers to encourage residential land use development with undeveloped parcels.

Increase support for business development (Measure: number of new businesses started each year; number of business failures; percentage of businesses locally owned).

Increase economic empowerment opportunities with jobs/training development and education to improve current and future workforce of residents' household income.

Connect NRSA residents with "closer to home" job opportunities.

Build out the entrepreneurial ecosystem to support development of sustainable microenterprise.

Potential Impact and Benefits

The expansion will allow for greater targeting of CDBG funds toward infrastructure improvements, housing rehabilitation, economic development, and social services. Benefits include:

Enhanced quality of life through safer, more connected public spaces.

Preservation and revitalization of affordable housing.

Increased opportunities for small business growth and workforce development.

Strengthened community identity and civic engagement.

Implementation Strategy

The Waukesha County Division of Community Development will coordinate a phased rollout over the next 12–18 months, which includes:

HUD submission and approval of the expanded NRSA plan.

Community engagement and outreach in the newly designated areas.

Integration of expansion into the annual CDBG Action Plan.

Coordination with public works, planning, and community development departments.

Key partners include the Waukesha Housing Authority, community-based organizations, neighborhood associations, and Waukesha County's Community Development office.

Performance Metrics and Evaluation

To ensure accountability and demonstrate the effectiveness of the expanded Neighborhood Revitalization Strategy Area (NRSA), the Waukesha County will implement a structured performance measurement and evaluation framework. This approach will track progress toward key goals, inform program adjustments, and support transparent reporting to HUD and the community.

Performance Measures

Performance indicators will be aligned with NRSA objectives as follows:

5-YEAR GOALS	BENCHMARKS: Annual Goals and 5-Year Benchmarks	Entities / Partners
OBJECTIVE: Improve the attractiveness of neighborhoods through residential rehabilitation and investment.		
1. Increase safety and maintenance of homes through code enforcement	40 housing units make repairs as a result of code enforcement (200 units by 2029)	City of Waukesha
2. Support and expand efforts for exterior home improvements (rehab loans and grants).	30 units of homeowner housing rehabilitated (150 units by 2029)	Waukesha County HOME and CDBG rehab loan programs, Habitat for Humanity Home Preservation Program
3. Demolish dilapidated housing and replace with new, affordable housing.	2 units of homeowner housing added (10 units by 2029)	Habitat for Humanity, Waukesha County HOME program
4. Increase homeownership rates by promoting downpayment assistance in the NRAs	5 new homeowners (25 homeowners by 2029)	Waukesha County HOME DPA, FHLBC DPP Program, housing counseling agencies, La Casa
5. Increase mixed-income, affordable rental housing	25 affordable rental units added (125 units by 2029)	Developers, WHEDA, Waukesha County HOME program
OBJECTIVE: Strengthen neighborhoods by improving public services and safety		
1. Strengthen partnerships between NRAs and Police Department	50 homeowners participate in doorbell camera program (250 by 2029)	City of Waukesha, Waukesha County CDBG, Tower Hill Neighborhood Association
2. Address quality of life issues for very low income and homeless population in NRSA neighborhoods	200 very low income and/or homeless individuals receive services through the HOPE Center, such as clothing, job training, transportation vouchers and meals (1,000 people by 2029)	Waukesha County CDBG, HOPE Center

5-YEAR GOALS	BENCHMARKS: Annual Goals and 5-Year Benchmarks	Entities / Partners
OBJECTIVE: Increase economic opportunities by empowering residents and helping business development		
1. Increase economic opportunities for LMI persons with job training/development, business development	10 LMI persons receive assistance in micro- entrepreneurship or technical skills. (50 persons by 2029)	WWBIC, Waukesha County CDBG
2. Expand and stabilize existing businesses.	2 businesses receive low interest loan for job creation/retention (10 businesses assisted by 2029)	Waukesha County CDBG, WWBIC, Milwaukee Economic Development Corporation
3. Improve downtown business facades	5 businesses receive grants to improve facades (25 businesses by 2029)	City of Waukesha, Waukesha County CDBG

Figure 14 – Waukesha NRSA 5-Year Performance Measurement Goals

Evaluation Strategy

CDBG program will conduct both ongoing monitoring and formal evaluations to assess program performance:

- **Quarterly Tracking and Reporting:**
CDBG staff will collect and analyze data quarterly to monitor progress on key indicators and flag areas needing corrective action or program adjustments.
- **Annual HUD Performance Reporting (CAPER):**
Outcomes related to NRSA activities will be integrated into the City's Consolidated Annual Performance and Evaluation Report (CAPER), providing a comprehensive overview of achievements and challenges.
- **Mid-Cycle Review:**
A midpoint evaluation (e.g., at year 2.5 of a 5-year plan) will assess cumulative impact, re-evaluate community needs, and recommend strategic refinements to maximize program effectiveness.

- **Community Feedback Mechanisms:**

Surveys, stakeholder interviews, and public meetings will be used to gather qualitative insights and ensure that NRSA initiatives remain resident-driven and responsive.

By combining quantitative metrics with qualitative input, the Waukesha County Division of Community Development can ensure that the expanded NRSA delivers meaningful, measurable outcomes that support long-term neighborhood revitalization and community well-being.

Funding and Resource Considerations to Leverage

Funding will primarily come from CDBG allocations, with potential for layering HOME funds, local TIF resources, and partnerships with nonprofit housing developers. Budget planning for 2025 CDBG funded projects in the NRSA is estimated at \$150,000.

To assist with implementation of the NRSAs goals and objectives, numerous local and statewide resources are available to leverage that include housing programs as well as workforce development and economic development resources are available.

- The City of Waukesha offers numerous grants and loans for businesses, homeowners, and landlords to encourage reinvestment (<https://www.waukeshawi.gov/government/departments/grants-loans-for-housing.php>):
- CDBG Grants/loans for Downtown Businesses include Façade Renovation/Repair, Awning Grant, Storefront Signage Grant.
- CDBG Grants/loans for Homeowners include Homeowner Rehab Loan Program, and Landmarks Commission Paint and Repair Grant.
- Rental Rehab Loan Program was created as an incentive for landlords with properties in targeted areas of the City and on gateways leading to downtown Waukesha
- The HOME Consortium (<http://www.homeconsortium.info/>) offers a variety of homeowner programs.
 - Home Ownership Assistance through Down Payment Assistance Loan (forgivable)
 - Homeowner Rehab Loan Programs for eligible properties and repairs

- Housing Development Fund to assist in construction of affordable housing
- Wisconsin Housing and Economic Development Authority (WHEDA) provides affordable housing and business financing products. These resources are available to home buyers, homeowners, renters, and real estate agents (<https://www.wheda.com/>).
- Habitat for Humanity of Waukesha County offers a Home Preservation Program that offers critical and minor home repairs at an affordable cost to homeowners (<https://www.habitatwaukesha.org/repair>).
- Waukesha County Workforce Development Center is located approximately one mile from the Salvation Army in the West Side NRSA. This location offers walk-in service to file unemployment claims and a variety of job search services and programs that include career planning, employment goals, and support services. For employers, the center also offers talent acquisition resources (<https://www.wfdc.org/>). In addition, other agencies operate in the area who address specific workforce challenges.
- For business development, numerous resources are available to support new and existing business growth including the Waukesha County Center for Growth, Wisconsin Economic Development Corporation, Connect Communities Program, and the Wisconsin Women's Business Initiative Corporation. In addition, the City of Waukesha actively uses Tax Incremental Financing to spur redevelopment and additional industrial development.

Conclusion and Recommendations

The proposed expansion of the NRSA boundaries offers a strategic, data-informed opportunity to deepen Waukesha's revitalization efforts. With strong community support and alignment with city and county plans, Waukesha County is well-positioned to implement this expansion and amplify positive outcomes. It is recommended that Waukesha County submit this proposal to HUD for approval and begin the process of integrating expanded areas into its community development programming.

While updating the NRSA designation to that of the Prairieville NRSA proposed area, expanding the Neighborhood Revitalization Strategy Area (NRSA) in the Waukesha County represents a proactive and equitable approach to supporting community development. A broader NRSA boundary will allow the community to leverage flexible HUD resources to address critical housing needs, stimulate small business growth, and implement place-based strategies that directly benefit low- and moderate-income residents. This expansion is a forward-looking investment in Waukesha's future—one that fosters economic opportunity, stabilizes neighborhoods, and supports inclusive revitalization across a wider area. Next steps recommended include:

1. Adopt the Proposed NRSA Boundary Expansion:

Proceed with submitting the revised NRSA boundaries to HUD for approval, ensuring alignment with program eligibility requirements and community development objectives.

2. Engage Residents and Stakeholders:

Conduct targeted outreach and engagement within newly included areas to inform residents of available programs and gather input to shape responsive initiatives.

3. Prioritize Affordable Housing and Homeownership Support:

Utilize NRSA flexibility to increase funding for rehabilitation, down payment assistance, and other housing programs that stabilize neighborhoods and prevent displacement.

4. Support Local Economic Development:

Expand technical assistance, façade improvement programs, and micro-enterprise support for small businesses within the new NRSA to stimulate job creation and commercial vitality.

5. Monitor and Report Outcomes:

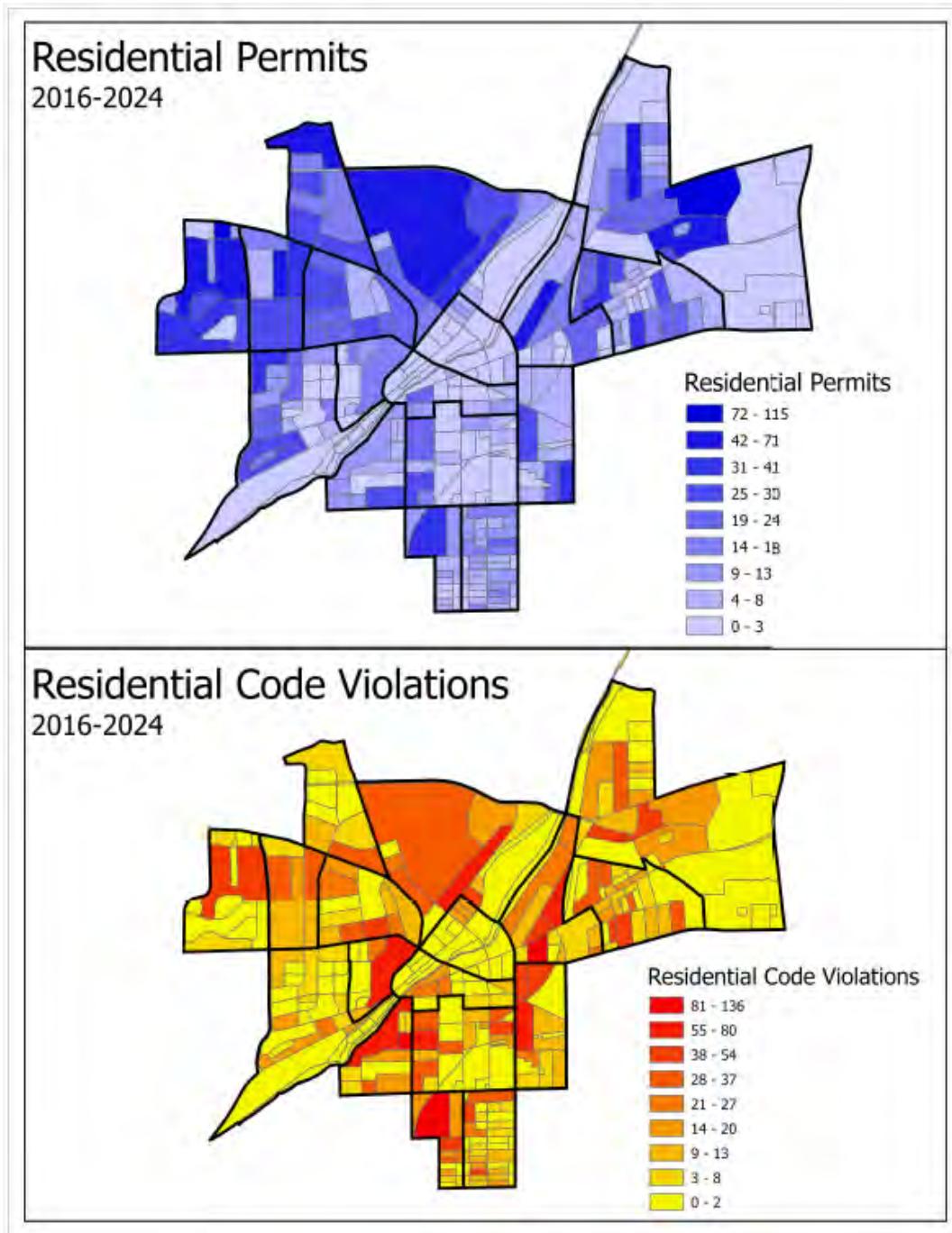
Establish clear performance metrics and community feedback loops to evaluate the impact of the expanded NRSA and ensure accountability and transparency in program delivery.

6. Coordinate with Other Initiatives:

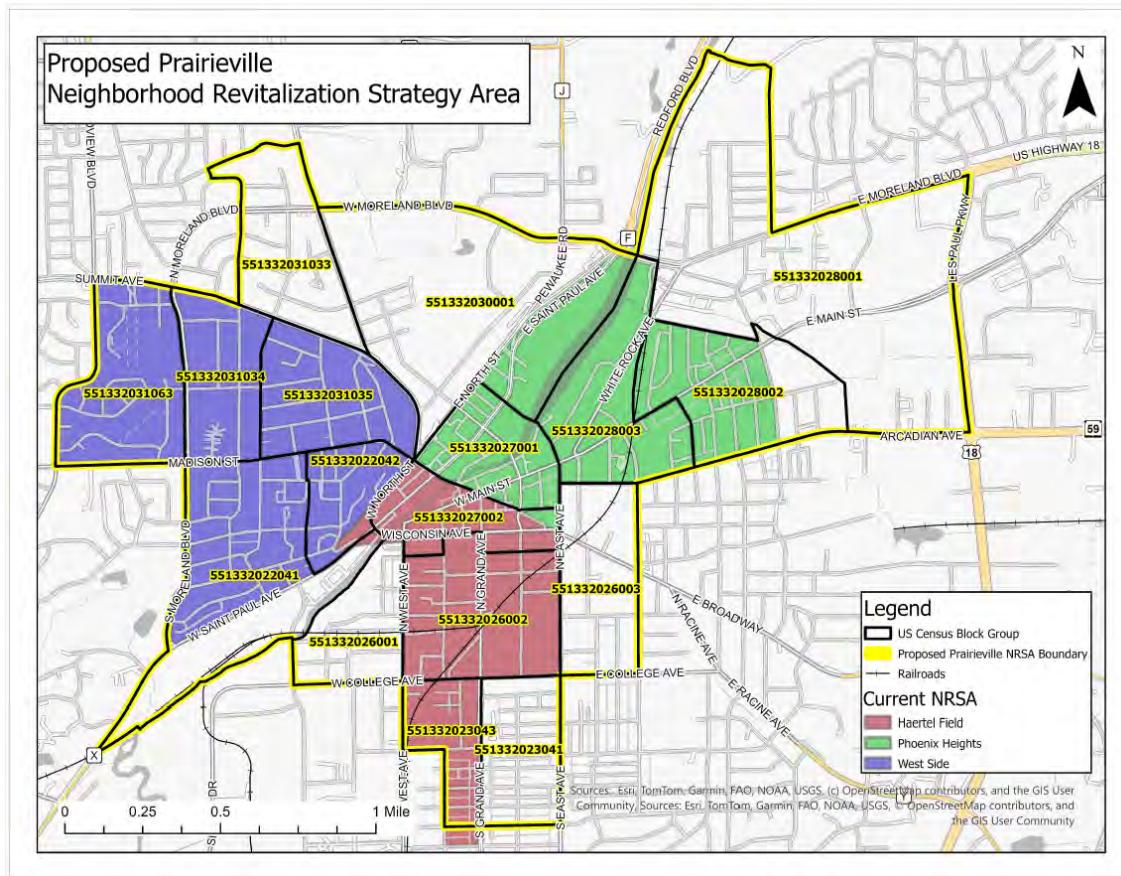
Align NRSA efforts with other local, state, and federal programs to maximize impact and reduce duplication, especially in areas such as workforce development, transportation, and public safety.

By adopting these recommendations, Waukesha can maximize the benefits of NRSA expansion and ensure meaningful, measurable progress toward a more inclusive and resilient city.

APPENDIX A: PRAIRIEVILLE NRSA RESIDENTIAL CODE VIOLATIONS AND PERMITS, 2016-2024



APPENDIX B: CURRENT AND PROPOSED NRSA DESIGNATIONS IN WAUKESHA COUNTY



APPENDIX C: 2020 AND 2050 LAND USE COMPARISON

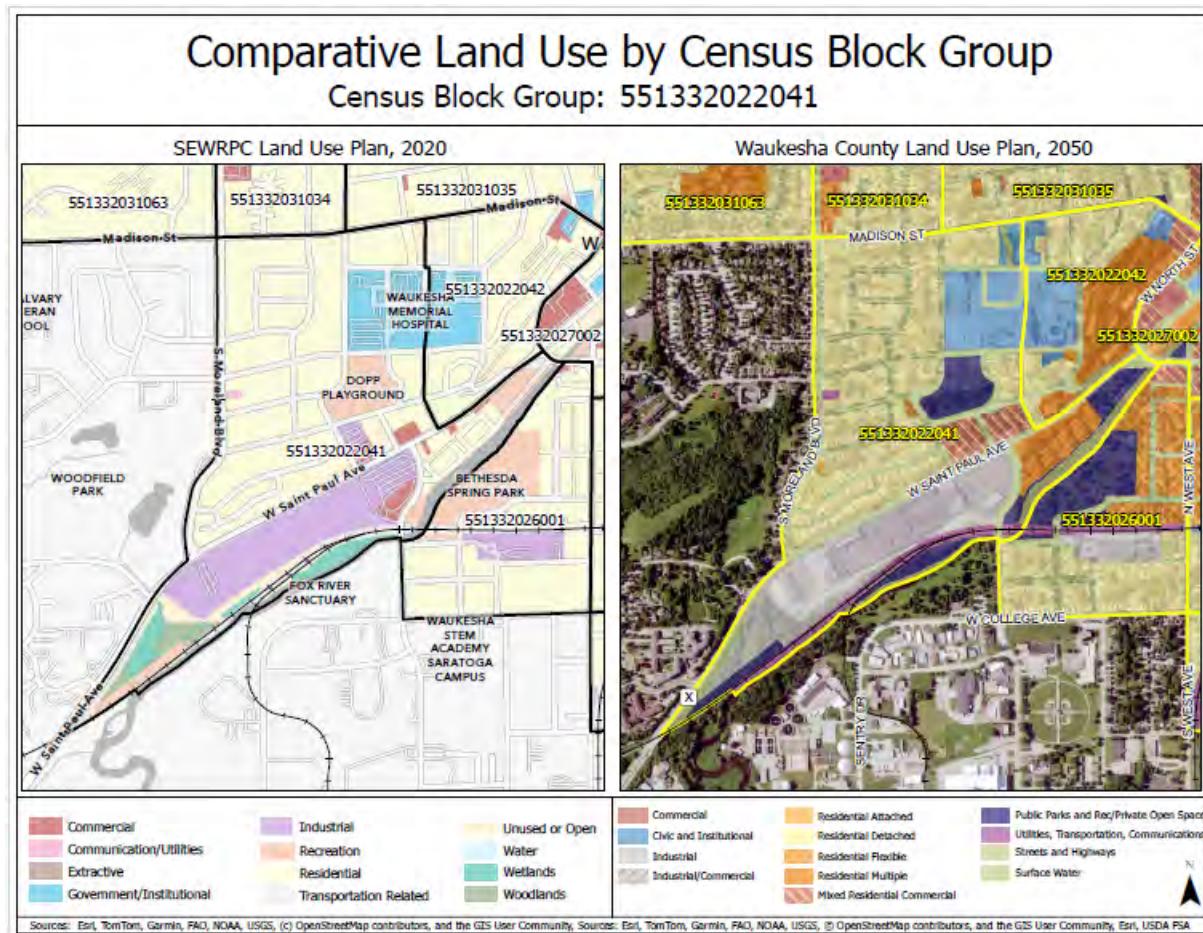
Census Block Group Number	Total Land Acres	Anticipated Percent Change in Land Use, 2020 & 2050					
		Residential	Commercial	Industrial	Unused/Open	Other	%
551332022041	198.26	2.83	-2.05	5.11	0.03	4.44	2.24%
551332022042	56.35	2.36	-1.92	0.00	0.00	-5.09	-9.03%
551332023041	77.31	-1.31	-0.18	0.00	0.00	0.00	0.00%
551332023043	54.90	0.00	0.00	-0.19	0.00	-0.10	-0.18%
551332026001	72.46	0.99	0.00	0.00	0.00	17.98	24.82%
551332026002	134.97	13.18	-5.07	-2.51	-0.02	2.42	1.80%
551332026003	98.60	1.05	-8.66	-2.07	-0.02	5.52	5.60%
551332027001	71.63	25.83	-28.79	-3.36	-0.05	-1.03	-1.43%
551332027002	66.24	38.35	-31.82	0.00	0.00	-2.44	-3.69%
551332028001	436.38	0.61	-11.76	2.09	0.00	-1.98	-0.45%
551332028002	134.14	3.04	-1.68	-7.94	-0.06	1.68	1.25%
551332028003	109.91	13.54	-5.87	-1.30	-0.01	16.45	14.96%
551332030001	286.87	11.58	-2.83	0.11	0.00	26.52	9.24%
551332031033	108.91	5.07	-4.34	0.00	0.00	-1.73	-1.59%
551332031034	86.41	0.00	0.00	0.00	0.00	-0.20	-0.23%
551332031035	104.91	5.78	-0.45	0.00	0.00	6.62	6.31%
551332031063	124.74	0.00	0.18	0.00	0.00	0.00	0.00%
Total	2222.97	6.11	-6.10	-0.02	0.00	69.07	3.11%

Residential Land Use in orange highlights may indicate a difference in classification between two datasets and not necessarily 100% growth from 2020-2050.

Values that may need to be added back to Commercial to adjust for the differences in classification.

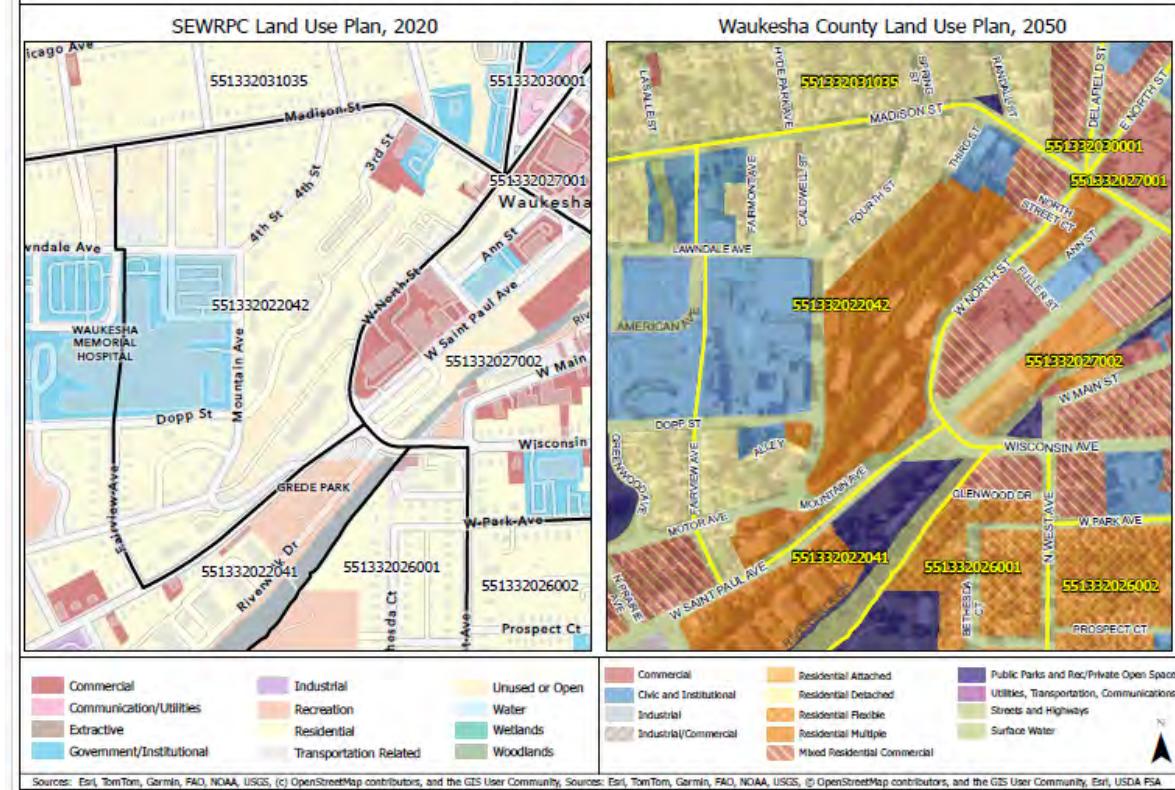
Adjusted Residential increase.

APPENDIX D: COMPARATIVE LAND USE BY PRAIRIEVILLE NRSA CENSUS BLOCK GROUPS



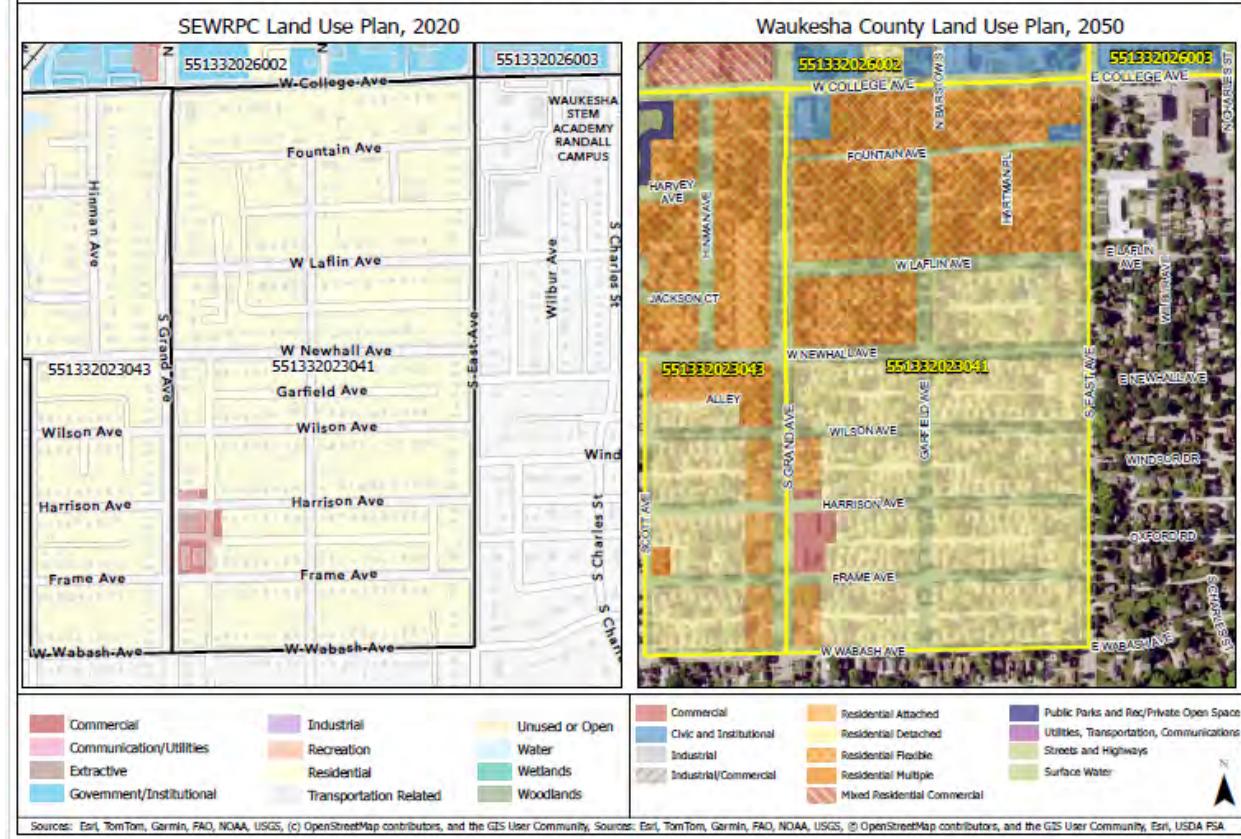
Comparative Land Use by Census Block Group

Census Block Group: 551332022042



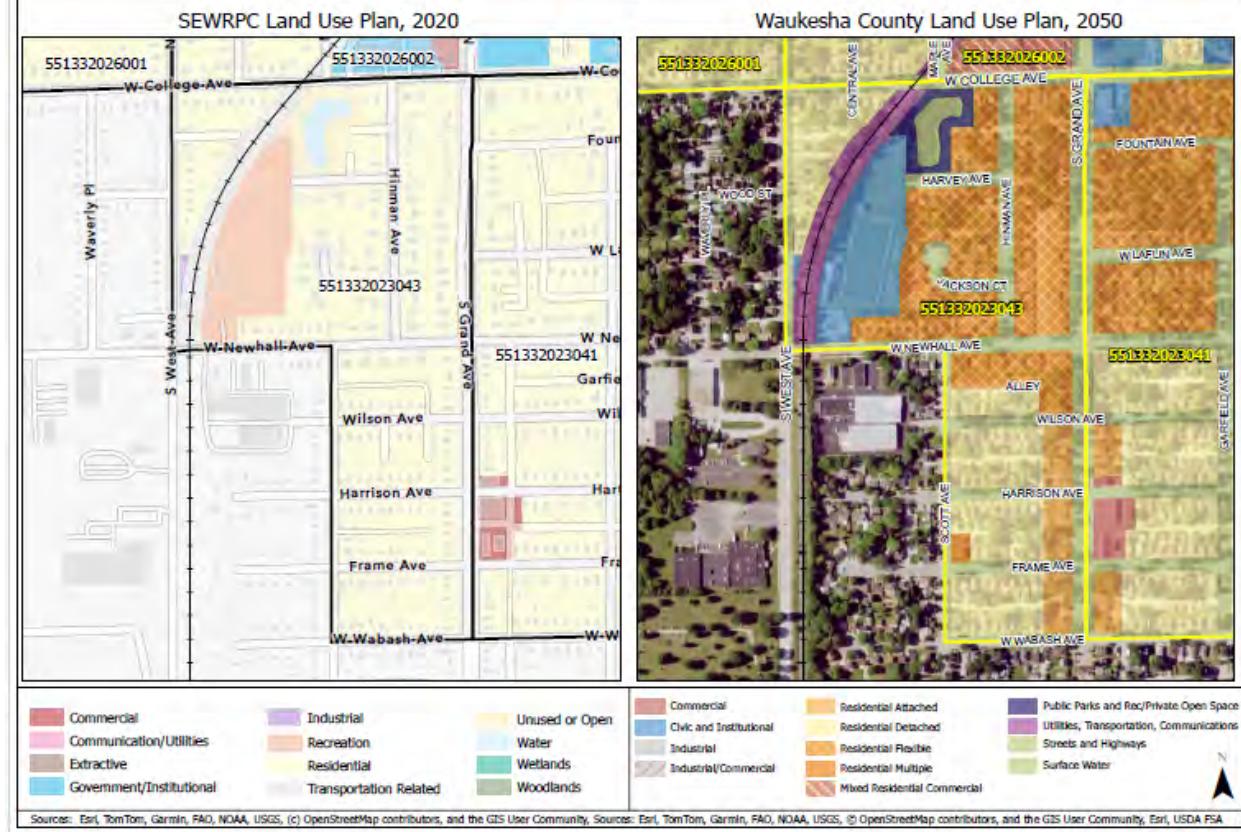
Comparative Land Use by Census Block Group

Census Block Group: 551332023041



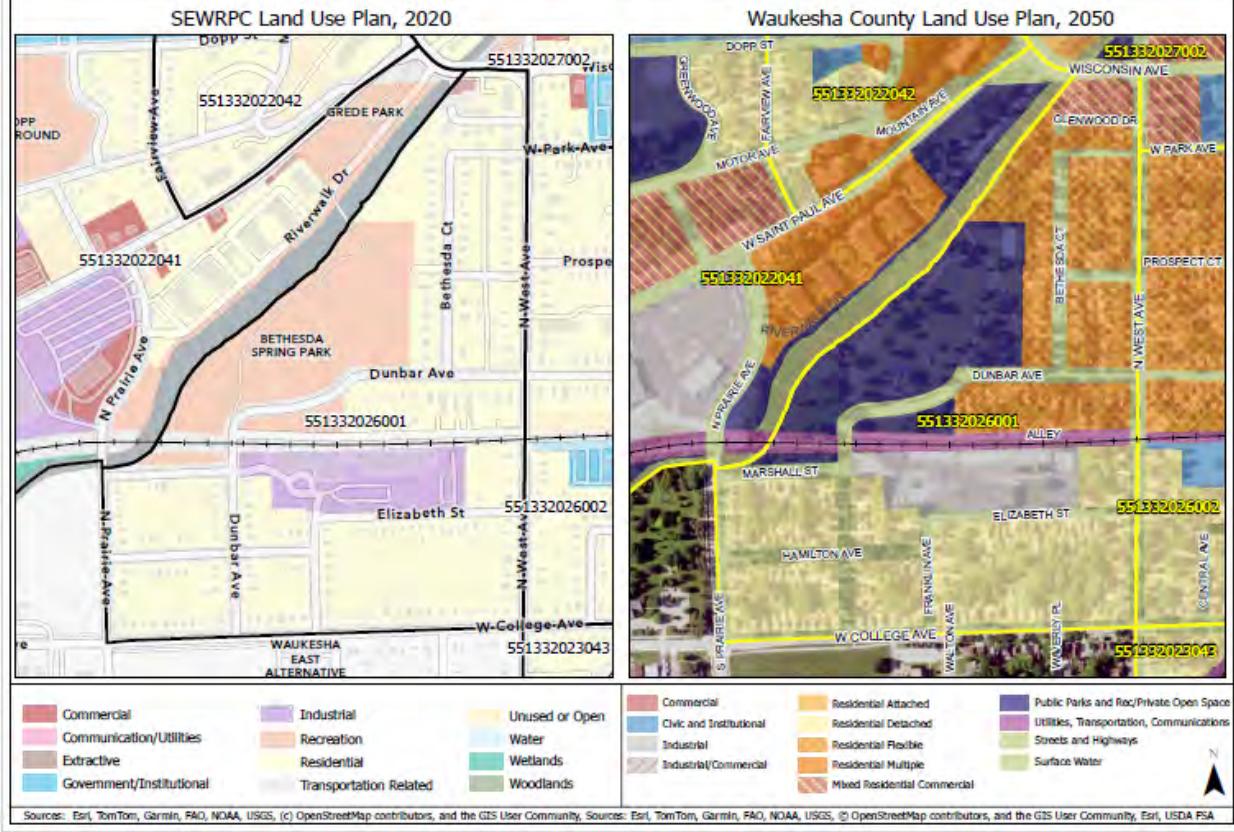
Comparative Land Use by Census Block Group

Census Block Group: 551332023043



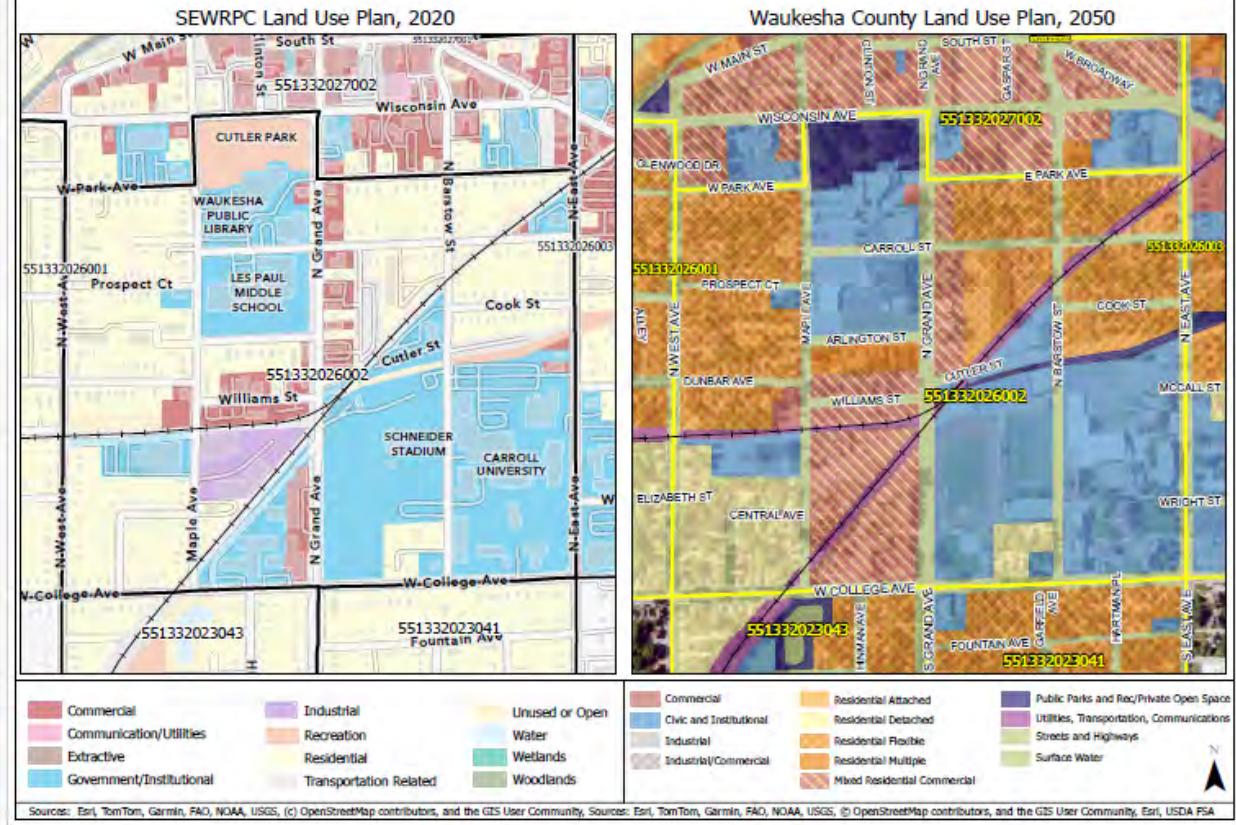
Comparative Land Use by Census Block Group

Census Block Group: 551332026001



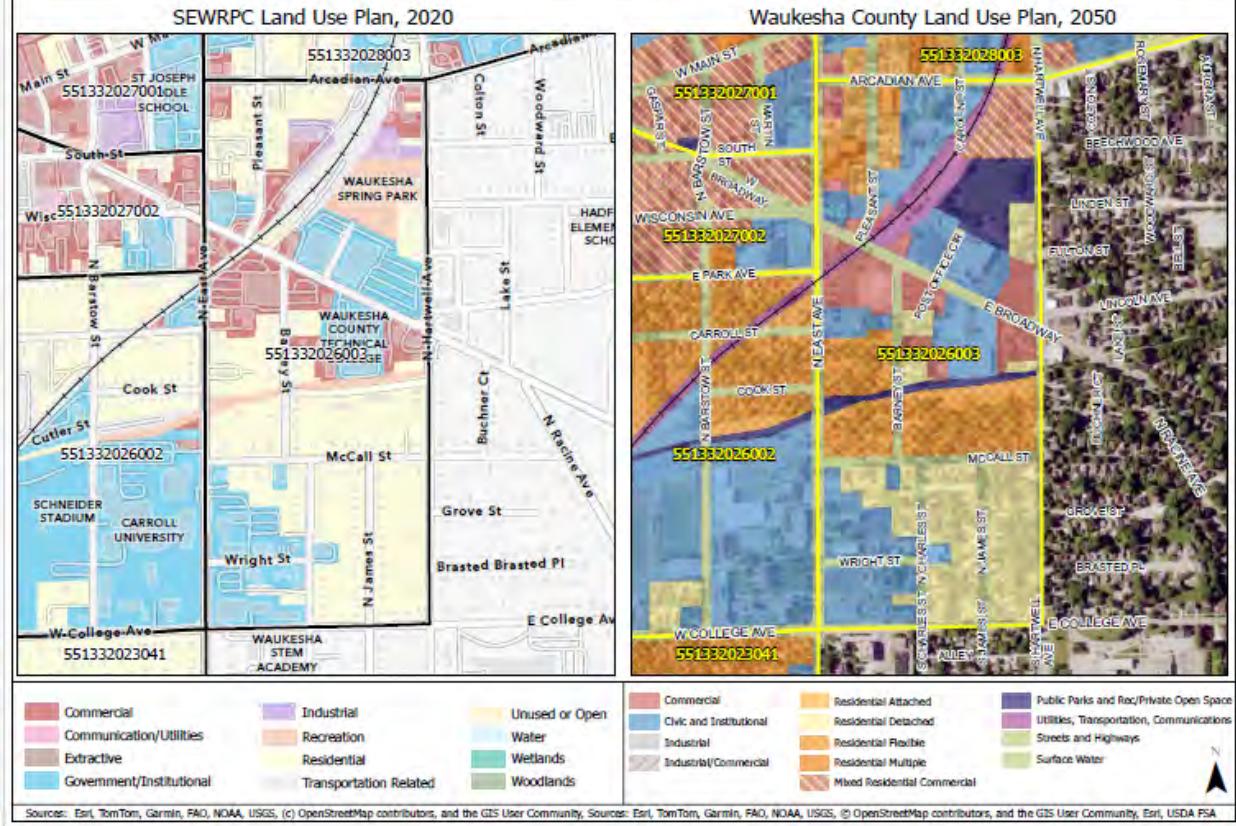
Comparative Land Use by Census Block Group

Census Block Group: 551332026002



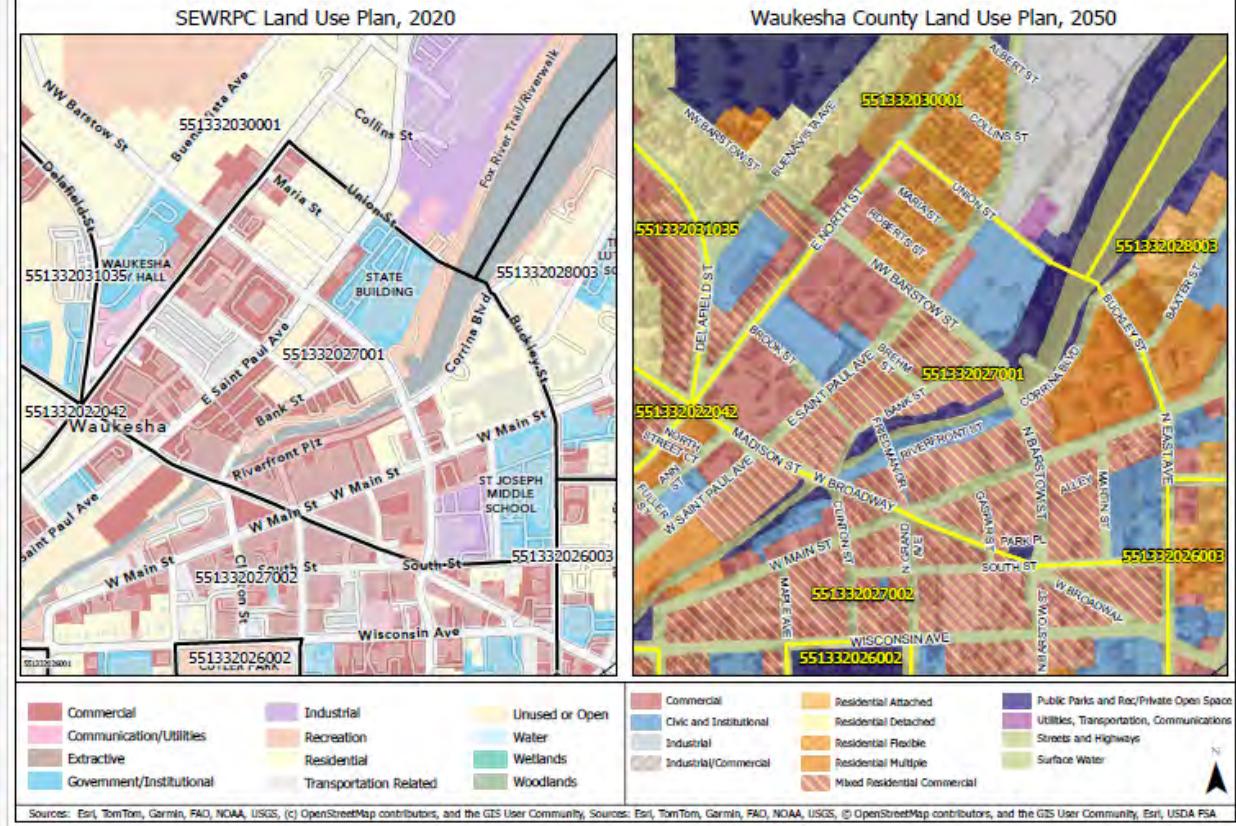
Comparative Land Use by Census Block Group

Census Block Group: 551332026003



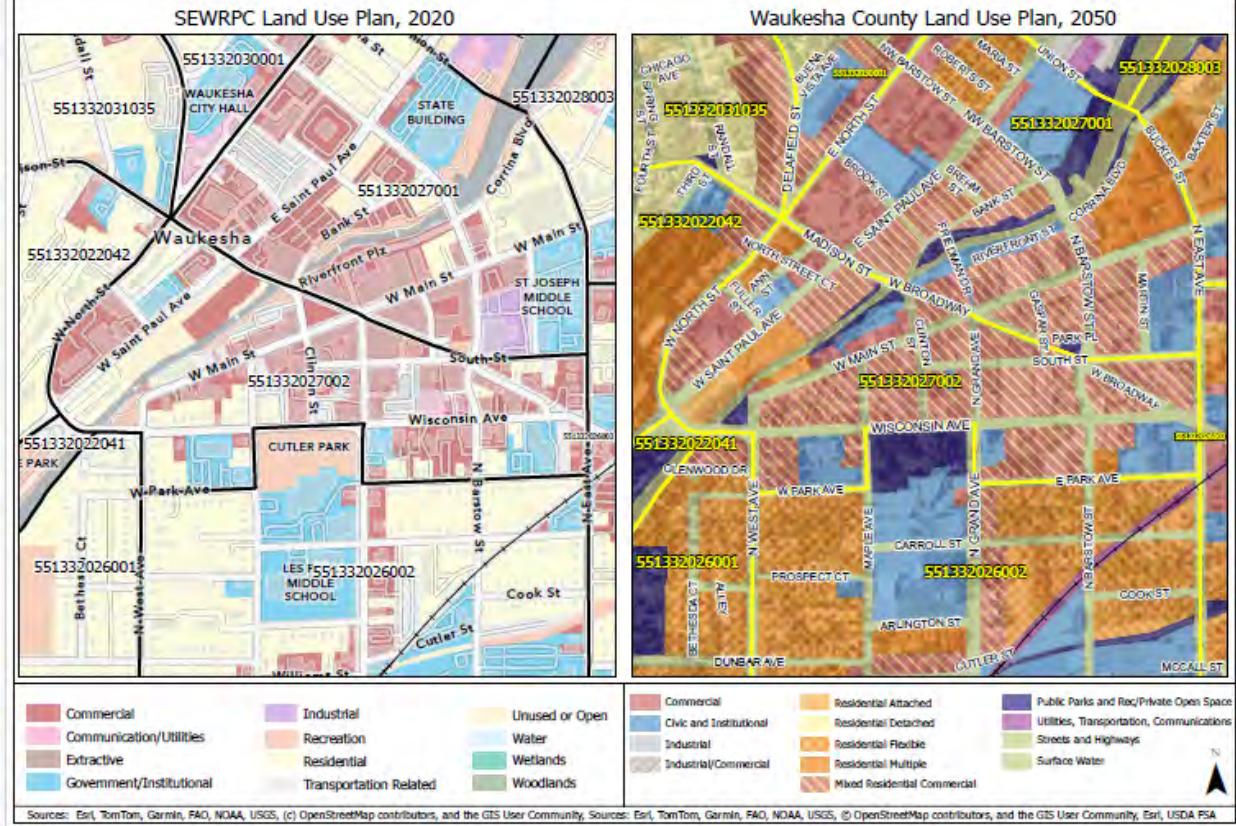
Comparative Land Use by Census Block Group

Census Block Group: 551332027001



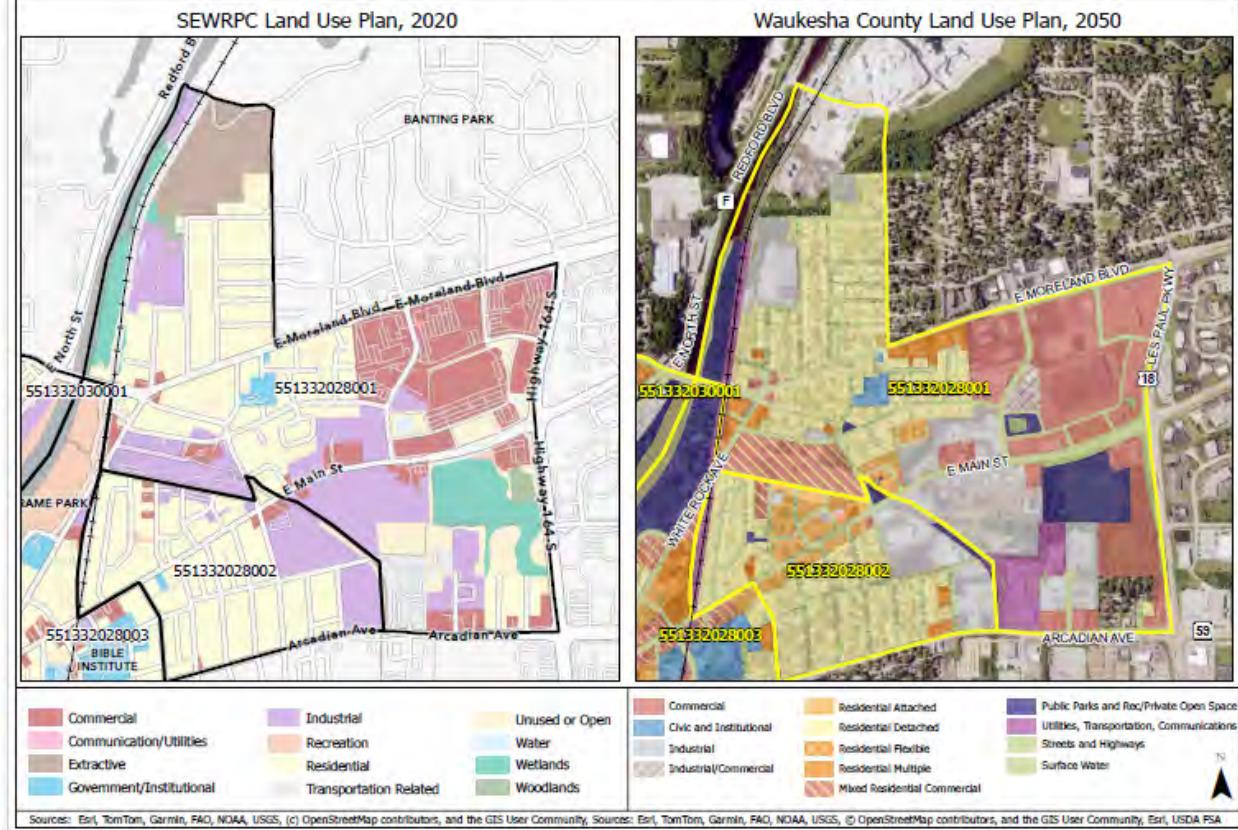
Comparative Land Use by Census Block Group

Census Block Group: 551332027002



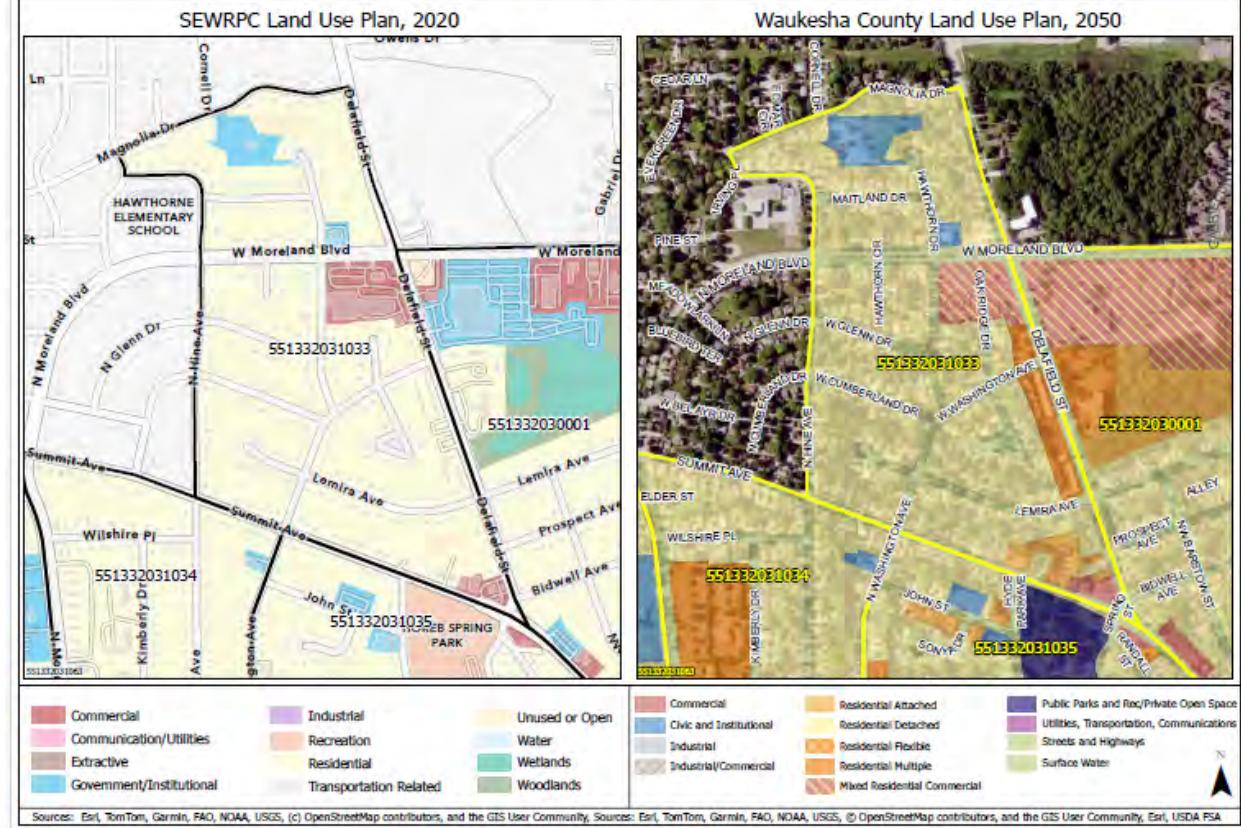
Comparative Land Use by Census Block Group

Census Block Group: 551332028001



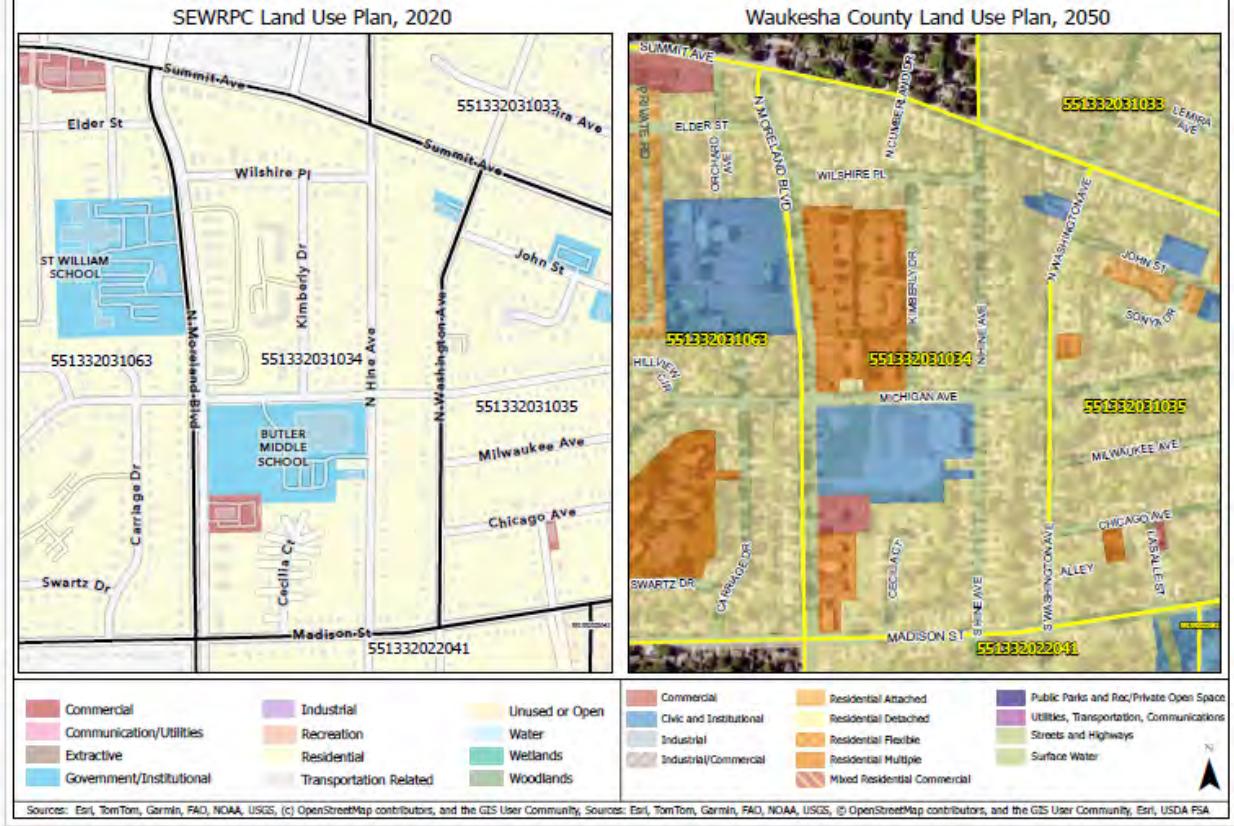
Comparative Land Use by Census Block Group

Census Block Group: 551332031033



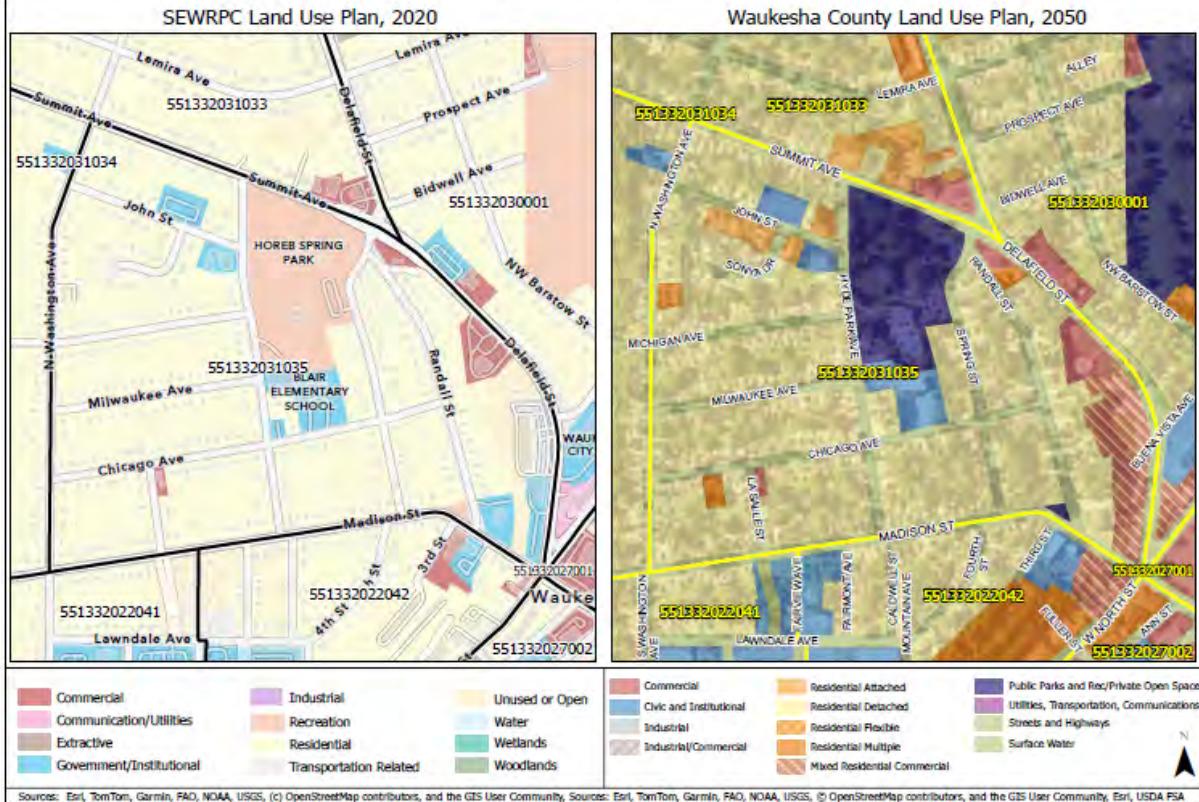
Comparative Land Use by Census Block Group

Census Block Group: 551332031034



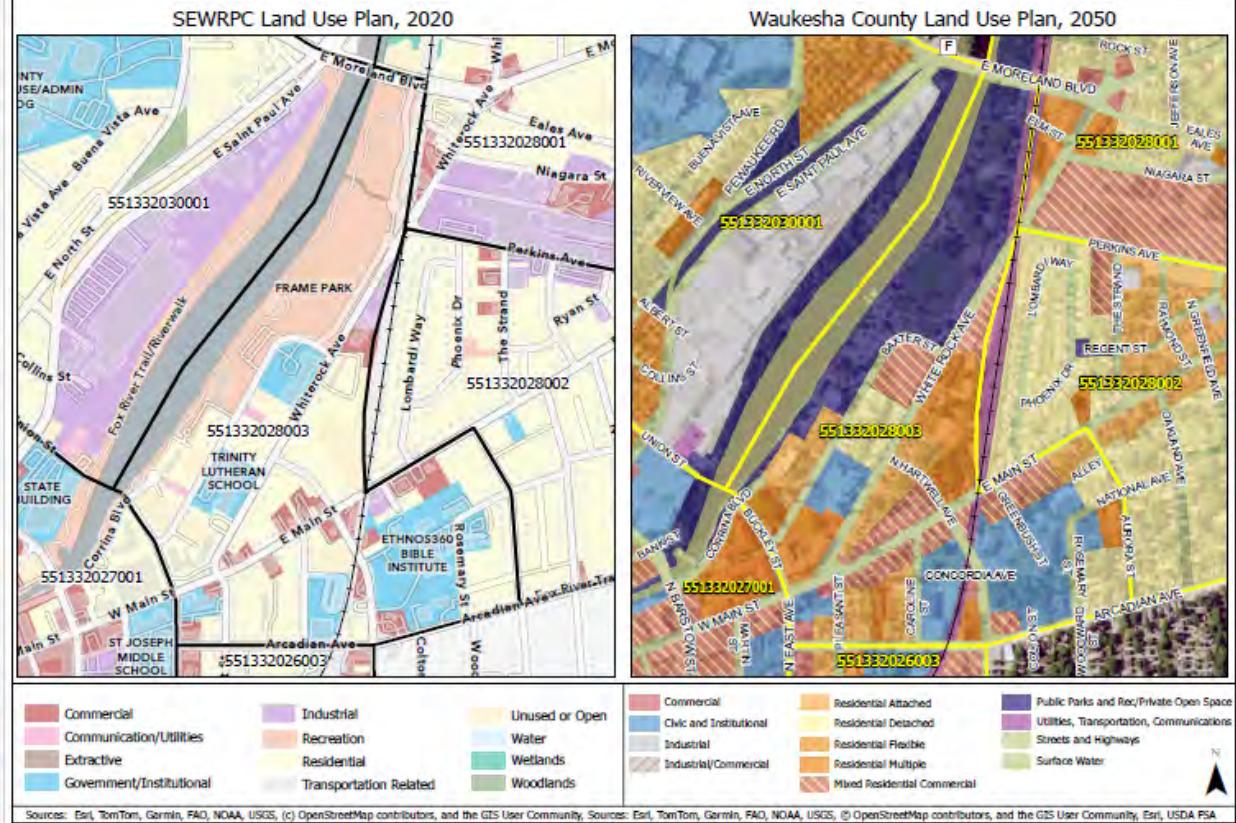
Comparative Land Use by Census Block Group

Census Block Group: 551332031035



Comparative Land Use by Census Block Group

Census Block Group: 551332028003



Comparative Land Use by Census Block Group

Census Block Group: 551332030001

