



2025-2029 CONSOLIDATED PLAN AND 2025 ANNUAL ACTION PLAN

For Waukesha County and the HOME Consortium

DRAFT: May 2025

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THE PROCESS

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

TABLE 1. RESPONSIBLE AGENCIES

Agency Role	Name	Department/Agency
Lead Agency	Waukesha County	
CDBG Administrator	Waukesha County	Department of Parks and Land Use/ Community Development Division
HOME Administrator	Waukesha County	Department of Parks and Land Use/ Community Development Division

Narrative

The Waukesha County Department of Parks and Land Use’s Community Development Division administers the County’s Community Development Block Grant (CDBG) program and the HOME Consortium’s HOME Investment Partnerships (HOME). The HOME Consortium includes Jefferson, Ozaukee, Washington, and Waukesha Counties, which participate together to receive HUD grant funds for affordable housing.

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PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

Introduction

Each program year, Waukesha County and the HOME Consortium conduct a variety of public outreach to garner input from county and municipal staff, government agencies, nonprofit organizations, affordable housing developers, local service providers, residents, and others to ensure the CDBG and HOME programs best serve low- and moderate-income residents. Waukesha County Community Development Division staff participate in regular meetings with the Housing Action Coalition, the local Continuum of Care comprised of organizations dedicated to addressing homelessness in Waukesha County. Community Development Division staff also coordinate monthly meetings of the CDBG and HOME Boards, the bodies responsible for overseeing HUD grant programs for Waukesha County and the HOME Consortium, respectively.

In developing this 2025-2029 Five-Year Consolidated Plan and 2025 Annual Action Plan, Waukesha County conducted outreach to local stakeholders through public meetings, individual and group interviews, a communitywide survey, and a public hearing on the draft plans. Through these avenues, the County gathered input regarding priority housing, homeless, and community development needs in the region, which form the basis for the goals and strategies outlined in the plans. Representatives from more than 35 agencies participated in development of the plans, including County and municipal staff, non-profit and government agencies, service and housing providers, and others.

Previous plans and studies conducted for Waukesha, Jefferson, Ozaukee, and Washington Counties also provided relevant direction for this Consolidated Plan. Specific reports used in the plan are listed in Table 3; relevant information from each is incorporated throughout the plan where applicable.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

Waukesha County relies on a network of public sector, private sector, and nonprofit agencies to implement CDBG- and HOME-funded projects within the County and the HOME Consortium. Waukesha County's CDBG program is governed by an 11-member Board of Directors appointed by the Waukesha County Executive. Each spring, the CDBG Board holds a competitive grant application process through which potential subgrantees, including nonprofit organizations and municipalities, can apply for funding for public services, public facilities and infrastructure, economic development, and affordable housing activities. Through this process, Waukesha County and the CDBG Board encourage coordination between

housing and service providers, as well as select applications for funding that represent well-coordinated approaches without a duplication of services.

Similarly, the HOME program is governed by a 12-person Board of Directors with equal representation from each county in the HOME Consortium (Jefferson, Ozaukee, Washington and Waukesha). Members are appointed by County Executives or the elected Chair of the County Board of Supervisors. Each year, the HOME Board establishes an annual budget for its core housing programs and awards funds to Community Housing Development Organizations (CHDOs) through a competitive application process. The HOME Board can prioritize projects that reflect well-coordinated efforts to connect assisted housing residents with various governmental and/or non-profit services.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Waukesha County participates in a Continuum of Care (CoC) called the Housing Action Coalition (a local continuum that is part of the Wisconsin Balance of State Continuum of Care) that seeks to meet the needs of homeless populations through the provision of permanent, transitional, and emergency housing; supportive services; and methods to accurately capture the number of homeless individuals in the area. Neither Waukesha County nor the HOME Consortium receives or manages Emergency Solutions Grant (ESG) funds; the Housing Action Coalition is the recipient of ESG. However, Waukesha County frequently allocates CDBG funds to local organizations that serve homeless populations, including emergency shelters, shelters for women and families, organizations that provide food and nutrition assistance, agencies that provide case management and supportive services, and health and medication assistance.

Within the HOME Consortium, the Community Action Coalition for South Central Wisconsin, Inc. (CAC) and the Supportive Services for Veteran Families (SSVF) programs operate in Waukesha and Jefferson Counties and supply services such as assistance obtaining shelter, health care, transportation, childcare, and other veteran benefits to homeless veterans and their families. While homeless resources are more limited outside of Waukesha County, several other agencies within the HOME Consortium address housing needs of homeless families, including Friends, Inc., Family Promise of Washington County, and Family Promise of Ozaukee County.

To coordinate this Five-Year Consolidated Plan and Annual Action Plan with existing efforts to address the needs of homeless persons, members of the Housing Action Coalition and agencies within the HOME Consortium working to address homelessness were invited to attend a series of community meetings, with a mix of in-person and virtual attendance options. Representatives from more than 20 organizations attended a meeting, and input received from the meetings is summarized in the next section (PR-15).

To maintain continued coordination with the CoC, the Waukesha County Executive appoints four people to serve on the Housing Action Coalition Board. Currently, two of those appointees are County employees in positions that are actively involved in addressing the needs of homeless persons. Waukesha County staff and the CDBG Board play instrumental roles in working to meet the needs of homeless individuals and families, including through the recent allocation of substantial CDBG funding to address emergency shelter needs.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

Neither Waukesha County nor the HOME Consortium receive ESG funding. The Housing Action Coalition receives ESG funding for use in Waukesha County. Waukesha County staff serve on the Housing Action Coalition Board and attend regular board meetings and meetings of the entire collaborative membership. As such, Waukesha County is represented in the decision making for ESG funds and helps to oversee management of those funds, including developing performance standards, evaluating outcomes, and administering HMIS.

Describe agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities.

Agencies, groups, organizations and others who participated in the Consolidated Plan planning process are shown in the table on the following pages.

Identify any agency types not consulted and provide rationale for not consulting.

Efforts were made to consult as broad a group of community stakeholders in Waukesha, Jefferson, Ozaukee, and Washington Counties as possible. Flyers regarding the planning process were emailed to more than 70 individuals, who were asked to share the information about the project with their networks. Flyers asked residents and stakeholders to participate by attending one of four public meetings held in different locations in the region and online or by completing an anonymous survey online. No agency types were excluded from participation.

TABLE 2. AGENCIES, GROUPS, AND ORGANIZATIONS WHO PARTICIPATED

Organization	Organization Type	Section of Plan Addressed
1. Aurora Healthcare	Services – Health, Health Agency	Housing Need Assessment, Non-Homeless Special Needs, Non-Housing Community Development
2. City of Waukesha	Local Government	Housing Need Assessment, Non-Housing Community Development, Anti-Poverty Strategy
3. City of Waukesha Community Development	Local Government	Housing Need Assessment, Non-Housing Community Development, Anti-Poverty Strategy
4. Community Action Coalition for South Central WI	Regional Organization	Housing Need Assessment, Homeless Needs, Non-Homeless Special Needs, Non-Housing Community Development
5. Community Outpatient Services of Menomonee Falls, Inc	Services – Health, Health Agency	Housing Need Assessment, Non-Homeless Special Needs, Non-Housing Community Development
6. Easterseals Southeast Wisconsin, Inc	Services – Children, Persons with Disabilities	Housing Need Assessment, Non-Homeless Special Needs, Non-Housing Community Development
7. Eras Senior Network, Inc	Services – Elderly Persons	Housing Need Assessment, Non-Homeless Special Needs, Non-Housing Community Development
8. Family Promise of Waukesha County, Inc	Housing, Services – Homeless	Housing Need Assessment, Homeless Needs – Families with Children, Homelessness Strategy
9. Food Pantry of Waukesha County, Inc	Services – Children, Homeless, Elderly Persons	Non-Homeless Special Needs, Non-Housing Community Development, Anti-Poverty Strategy

Organization	Organization Type	Section of Plan Addressed
10. Greater Watertown Community Health Foundation	Services - Health	Non-Homeless Special Needs, Non-Housing Community Development
11. Haase Community Connections	Housing	Housing Need Assessment, Homeless Needs – Families with Children, Homelessness Strategy, Non-Homeless Special Needs, Non-Housing Community Development
12. Habitat for Humanity	Housing	Housing Need Assessment, Market Analysis, Anti-Poverty Strategy
13. Hebron House	Housing, Services – Homeless	Housing Need Assessment, Homeless Needs, Homelessness Strategy, Non-Housing Community Development
14. Hope Center, Inc.	Housing, Services – Homeless	Housing Need Assessment, Homeless Needs, Homelessness Strategy, Non-Housing Community Development
15. Horizon Development	Housing	Housing Need Assessment, Market Analysis, Anti-Poverty Strategy
16. Interfaith Caregivers	Services – Elderly Adults	Housing Need Assessment, Non-Homeless Special Needs, Non-Housing Community Development
17. Jefferson County Economic Development	County Government	Housing Need Assessment, Market Analysis, Non-Housing Community Development
18. Journey21, Inc	Services – Persons with Disabilities	Non-Homeless Special Needs, Non-Housing Community Development
19. La Casa de Esperanza, Inc	Housing, Services – Children	Housing Need Assessment, Market Analysis

Organization	Organization Type	Section of Plan Addressed
20. Lake Area Free Clinic, Inc.	Services – Health, Health Agency	Non-Homeless Special Needs, Non-Housing Community Development
21. Metro Milwaukee Fair Housing Council	Services – Fair Housing, Regional Organization	Housing Need Assessment, Non-Housing Community Development
22. Oconomowoc Silver Streak, Inc	Services – Elderly Persons	Non-Homeless Special Needs, Non-Housing Community Development
23. Parents Place	Services – Children, Families	Non-Homeless Special Needs, Non-Housing Community Development
24. Salvation Army	Housing, Services – Homeless	Homeless Needs – Chronically Homeless, Families with Children, Veterans, Unaccompanied Youth
25. Seniors on the GO! Taxi Service, Inc	Services – Elderly Adults	Non-Homeless Special Needs, Non-Housing Community Development
26. St. Vincent de Paul Ozaukee County	Housing, Services – Families, Homeless, Referrals	Non-Homeless Special Needs, Non-Housing Community Development
27. St. Vincent de Paul Waukesha County	Housing, Services – Families, Homeless, Referrals	Non-Homeless Special Needs, Non-Housing Community Development
28. Thrive Economic Development	Economic Development	Housing Need Assessment, Market Analysis, Anti-Poverty Strategy
29. Tower Hill Neighborhood Association, Inc	Neighborhood Organization, Services – Employment	Market Analysis, Non-Housing Community Development
30. United Way Ozaukee County		Housing Need Assessment, Market Analysis, Anti-Poverty Strategy
31. UW Extension	Regional Organization, Planning Organization	NRSA Plan, Non-Housing Community Development, Anti-Poverty Strategy

Organization	Organization Type	Section of Plan Addressed
32. Waukesha County Health and Human Services	County Government	Housing Need Assessment, Homeless Needs, Non-Homeless Special Needs, Non-Housing Community Development
33. Waukesha County Office of Emergency Management	County Government	Environmental Hazard Mitigation, Housing Need Assessment
34. Waukesha Free Clinic	Services – Health, Health Agency	Non-Homeless Special Needs, Non-Housing Community Development
35. Women’s Center, Inc.	Services – Victims of Domestic Violence	Housing Need Assessment, Non-Homeless Special Needs, Non-Housing Community Development
36. WWBIC - Madison	Business Leaders, Regional Organization, Economic Development	Housing Need Assessment, Market Analysis, Anti-Poverty Strategy, Non-Housing Community Development
37. WWBIC - Milwaukee	Business Leaders, Regional Organization, Economic Development	Housing Need Assessment, Market Analysis, Anti-Poverty Strategy, Non-Housing Community Development

PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)

Summarize the citizen participation process and efforts made to broaden citizen participation.

TABLE 3. CITIZEN PARTICIPATION OUTREACH

Mode of Outreach	Target	Summary of Attendance and Comments
Public Meetings	Residents, including minority residents, people with limited English proficiency, people with disabilities, and assisted housing residents; Housing and service providers; Community development practitioners	<p>Nine people attended one of four community meetings to provide input for the Consolidated Plan. Attendees stressed the need for affordable housing in Waukesha County and throughout the HOME Consortium. For many households, rent increases cannot be accommodated within their existing budget. A particular need is affordable housing for people with disabilities, including intellectual and developmental disabilities. Rental housing rehabilitation is also need. Access to homeownership can be difficult as buyers with cash offers and no contingencies are able to outbid traditional buyers.</p> <p>Participants noted that while homelessness is more common in Waukesha County, it is growing in other areas of the HOME Consortium as well. Although there is some funding for rental assistance/ homelessness prevention, the need outpaces the funding.</p> <p>Key community development need identified by meeting participants include food delivery, shelter support, case management, transportation, health care, entrepreneurship support, broadband access in rural areas, and financial literacy/homeownership prep.</p>

Mode of Outreach	Target	Summary of Attendance and Comments
Individual and Small Group Interviews	Housing and service providers; Community development practitioners	<p>Nine people participated in individual or small group interviews to provide input for the Consolidated Plan. Key topics discussed by participants include:</p> <ul style="list-style-type: none"> • Accessing homeownership is very difficult for low/moderate income households without assistance. Down payment assistance is helpful, and subsidy levels could be increased to better assist target households. For agencies developing affordable for-sale housing, land acquisition can be difficult. • Given the limited supply of housing, homelessness/eviction prevention is important in keeping people housed. Transitional housing is also a need. • All types of housing is needed, including affordable for-sale and rental units. With housing stock on the older side, there is just a need for more units. • Non-housing community development needs include childcare, anti-poverty programs, youth activities, mental health services, transportation assistance,
Virtual Stakeholder Meeting	Housing and service providers; Community development practitioners	<p>Eleven people joined a virtual stakeholder meeting to provide input for the Consolidated Plan. Housing affordability was identified as a severe need by participants, who noted that a stagnant market was limiting housing availability and resulting in a deficit of housing units at various income levels, as shown in a recent City of Waukesha housing study. High interest rates are barriers to homeownership, while eviction histories impact access to rental housing. When households are able to find affordable units, they are often in poor or unsafe condition. Landlords refusing to</p>

Mode of Outreach	Target	Summary of Attendance and Comments
		<p>accept HUD Section 8 vouchers administered by local housing authorities are another barrier. Lack of housing availability also impacts homeless residents; cost aside, there are not units into which they are able to move.</p> <p>In addition to affordable housing, there is need for mental health and addiction recovery resources, as well as additional emergency shelter space. There is also need housing with supportive services.</p>
Community Survey	Residents, including minority residents, people with limited English proficiency, people with disabilities, and assisted housing residents; Housing and service providers; Community development practitioners	<p>The community survey received 54 responses. Top housing needs identified include: (1) new construction of affordable rental units; (2) housing for people with disabilities; (3) tenant-based rental assistance; and (4) rental rehabilitation grants and loans. Permanent housing was the #1 identified to address homelessness, followed by transitional housing and supportive housing programs.</p> <p>Top community development needs identified by survey respondents include: (1) domestic abuse services; (2) transportation/shared ride taxis; (3) childcare and childcare centers; (4) employment training; (5) employment services; (6) homeless services; (7) senior services; (8) child abuse prevention/parenting classes; (9) medical and dental services; and (10) community center improvements.</p>
Public Comment Period	Residents, including minority residents, people with limited English proficiency, people with disabilities, and assisted	TBD

Mode of Outreach	Target	Summary of Attendance and Comments
	housing residents; Housing and service providers; Community development practitioners	
Public Hearing	Residents, including minority residents, people with limited English proficiency, people with disabilities, and assisted housing residents; Housing and service providers; Community development practitioners	TBD

NEEDS ASSESSMENT

NA-05 Overview

Needs Assessment Overview

To inform development of priorities and goals over the next five years, this section of the Consolidated Plan discusses housing, community development, and economic development needs in Waukesha County. It relies on data from the U.S. Census, the 2016-2020 5-Year American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with one or more housing needs. Local data regarding homelessness and assisted housing is included. Finally, public input gathered through interviews, meetings, and the community survey are coupled with data analysis to identify priority needs related to affordable housing, homelessness, assisted housing, community development, and economic development in both Waukesha County and the HOME Consortium Region.

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Table 4. Housing Needs Assessment Demographics

Demographics	Base Year: 2009	Most Recent Year: 2020	Percent Change
Waukesha County			
Population	392,425	402,637	3%
Households	154,405	159,780	3%
Median Income	\$76,545	\$88,985	16%
HOME Consortium			
Population	676,560	690,675	2%
Households	266,585	276,155	4%
Median Income	Not Available	Not Available	
<i>Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)</i>			

Number of Households Table

Table 5. Total Households Table

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Waukesha County					
Total households	10,590	13,878	21,080	14,410	84,695
Small family households	1,884	2,214	5,069	4,848	46,790
Large family households	478	484	924	902	7,714
Household contains at least one person 62-74 years of age	2,567	3,758	5,733	3,591	18,091
Household contains at least one person age 75 or older	3,286	4,960	4,885	2,491	5,515
Households with one or more children 6 years old or younger	1,044	1,088	1,982	1,796	8,320
HOME Consortium					
Total households	22,832	28,305	43,433	28,655	152,865
Small family households	4,273	5,043	11,310	10,576	84,909
Large family households	654	1,060	2,370	1,938	13,725
Household contains at least one person 62-74 years of age	5,478	7,632	11,815	7,388	33,000
Household contains at least one person age 75 or older	6,208	8,917	8,785	4,157	10,035
Households with one or more children 6 years old or younger	2,183	2,580	4,771	3,801	15,448
<i>Data Source: 2016-2020 CHAS</i>					

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

Table 6. Housing Problems Table

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Waukesha County Households										
Substandard Housing - Lacking complete plumbing or kitchen facilities	133	279	75	65	552	4	0	18	25	47
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	154	139	50	70	413	10	0	0	0	10
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	105	190	110	75	480	65	4	74	44	187
Housing cost burden greater than 50% of income (and none of the above problems)	4,198	2,129	579	165	7,071	3,021	2,333	1,246	242	6,842
Housing cost burden greater than 30% of income (and none of the above problems)	508	3,317	2,956	375	7,156	1,054	2,362	3,743	1,961	9,120
Zero/negative Income (and none of the above problems)	255	0	0	0	255	267	0	0	0	267

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
HOME Consortium Households										
Substandard Housing - Lacking complete plumbing or kitchen facilities	371	429	200	94	1,094	67	38	48	68	221
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	154	158	75	70	457	10	15	0	8	33
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	180	304	240	169	893	129	48	227	72	476
Housing cost burden greater than 50% of income (and none of the above problems)	8,563	3,198	772	195	12,728	5,873	3,761	2,270	434	12,338
Housing cost burden greater than 30% of income (and none of the above problems)	1,444	7,295	5,070	608	14,417	2,062	4,536	7,531	3,457	17,586
Zero/negative Income (and none of the above problems)	995	0	0	0	995	918	0	0	0	918
Data Source: 2016 2020 CHAS										

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

Table 7. Housing Problems 2

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Waukesha County Households										
Having 1 or more of four housing problems	4,593	2,739	809	370	8,511	3,101	2,338	1,343	312	7,094
Having none of four housing problems	1,301	4,162	7,803	4,187	17,453	1,591	4,644	11,105	9,545	26,885
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0
HOME Consortium Households										
Having 1 or more of four housing problems	9,283	4,092	1,294	523	15,192	6,063	3,866	2,539	582	13,050
Having none of four housing problems	3,909	10,281	15,448	8,024	37,662	3,573	10,066	24,163	19,509	57,311
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0
Data Source: 2016-2020 CHAS										

3. Cost Burden > 30%

Table 8. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Waukesha County Households								
Small Related	1,149	880	677	2,706	543	969	1,593	3,105
Large Related	329	179	95	603	138	167	395	700
Elderly	2,142	3,359	1,947	7,448	2,759	2,914	2,044	7,717
Other	1,472	1,529	910	3,911	698	658	992	2,348
Total need by income	5,092	5,947	3,629	14,668	4,138	4,708	5,024	13,870
HOME Households								
Small Related	2,400	2,095	1,372	5,867	1,254	1,758	2,871	5,883
Large Related	364	400	184	948	260	270	832	1,362
Elderly	4,147	5,678	2,800	12,625	5,318	5,039	4,042	14,399
Other	3,757	3,006	1,668	8,431	1,288	1,329	2,149	4,766
Total need by income	10,668	11,179	6,024	27,871	8,120	8,396	9,894	26,410
Data Source: 2016-2020 CHAS								

4. Cost Burden > 50%

Table 9. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Waukesha County Households								
Small Related	0	0	249	249	457	562	0	1,019
Large Related	0	0	10	10	138	69	108	315
Elderly	1,924	1,656	483	4,063	1,911	1,350	572	3,833
Other	0	1,278	545	1,823	572	0	0	572
Total need by income	1,924	2,934	1,287	6,145	3,078	1,981	680	5,739
HOME Consortium Households								
Small Related	0	0	382	382	1,020	920	0	1,940
Large Related	0	0	40	40	260	123	172	555
Elderly	3,602	2,272	642	6,516	3,747	2,151	972	6,870
Other	0	3,193	876	4,069	1,020	0	0	1,020
Total need by income	3,602	5,465	1,940	11,007	6,047	3,194	1,144	10,385
Data Source: 2016-2020 CHAS								

5. Crowding (More than one person per room)

Table 10. Crowding Information - 1/2

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Waukesha County Households										
Single family households	214	220	140	135	709	65	4	74	44	187
Multiple, unrelated family households	45	0	0	0	45	10	0	0	0	10
Other, non-family households	0	109	20	10	139	0	0	0	0	0
Total need by income	259	329	160	145	893	75	4	74	44	197
HOME Consortium Households										
Single family households	279	353	225	219	1,076	129	59	192	72	452
Multiple, unrelated family households	45	0	55	10	110	10	4	35	4	53
Other, non-family households	10	109	35	10	164	0	4	10	4	18
Total need by income	334	462	315	239	1,350	139	67	237	80	523
<i>Data Source: 2016-2020 CHAS</i>										

Table 11. Crowding Information - 2/2

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

0%-30% of Area Median Income

Table 12. Disproportionately Greater Need 0 - 30% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Waukesha County Households			
Jurisdiction as a whole	8,556	945	733
White	7,448	714	711
Black / African American	334	155	0
Asian	189	0	4
American Indian, Alaska Native	35	0	0
Pacific Islander	0	0	0
Hispanic	450	35	14
HOME Consortium Households			
Jurisdiction as a whole	17,328	2,079	1,652
White	15,564	1,709	1,626
Black / African American	437	220	0
Asian	278	10	4
American Indian, Alaska Native	43	4	0
Pacific Islander	0	0	0
Hispanic	812	94	18
Note: The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%. Data Source: 2016-2020 CHAS			

30%-50% of Area Median Income

Table 13. Disproportionally Greater Need 30 - 50% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Waukesha County Households			
Jurisdiction as a whole	9,950	2,944	0
White	8,770	2,750	0
Black / African American	275	24	0
Asian	130	10	0
American Indian, Alaska Native	8	4	0
Pacific Islander	40	0	0
Hispanic	693	108	0
HOME Consortium Households			
Jurisdiction as a whole	18,956	6,527	0
White	17,102	6,171	0
Black / African American	373	49	0
Asian	225	24	0
American Indian, Alaska Native	12	4	0
Pacific Islander	40	0	0
Hispanic	1,110	205	0
Note: The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%. Data Source: 2016-2020 CHAS			

50%-80% of Area Median Income

Table 14. Disproportionally Greater Need 50 - 80% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Waukesha Consortium Households			
Jurisdiction as a whole	9,876	11,789	0
White	9,190	10,873	0
Black / African American	54	130	0
Asian	169	215	0
American Indian, Alaska Native	0	29	0
Pacific Islander	0	0	0
Hispanic	416	478	0
HOME Consortium Households			
Jurisdiction as a whole	18,149	25,057	0
White	16,917	23,212	0
Black / African American	164	290	0
Asian	194	282	0
American Indian, Alaska Native	0	37	0
Pacific Islander	4	0	0
Hispanic	694	1,117	0
Note: The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%.			
Data Source: 2016-2020 CHAS			

80%-100% of Area Median Income

Table 15. Disproportionally Greater Need 80 - 100% AMI

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Waukesha County Households			
Jurisdiction as a whole	4,312	11,267	0
White	4,122	10,467	0
Black / African American	45	147	0
Asian	30	149	0
American Indian, Alaska Native	4	4	0
Pacific Islander	0	0	0
Hispanic	65	370	0
HOME Consortium Households			
Jurisdiction as a whole	7,109	22,076	0
White	6,778	20,618	0
Black / African American	75	196	0
Asian	58	256	0
American Indian, Alaska Native	4	56	0
Pacific Islander	0	0	0
Hispanic	127	707	0
Note: The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%.			
Data Source: 2016-2020 CHAS			

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

0%-30% of Area Median Income

Table 16. Severe Housing Problems 0 - 30% AMI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Waukesha County Households			
Jurisdiction as a whole	7,274	2,211	733
White	6,304	1,846	711
Black / African American	280	205	0
Asian	189	0	4
American Indian, Alaska Native	35	0	0
Pacific Islander	0	0	0
Hispanic	375	110	14
HOME Consortium Households			
Jurisdiction as a whole	14,578	4,812	1,652
White	13,052	4,195	1,626
Black / African American	375	278	0
Asian	268	20	4
American Indian, Alaska Native	35	12	0
Pacific Islander	0	0	0
Hispanic	652	254	18
Note: The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden greater than 50%.			
Data Source: 2016-2020 CHAS			

30%-50% of Area Median Income

Table 17. Severe Housing Problems 30 - 50% AMI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Waukesha County Households			
Jurisdiction as a whole	5,134	7,769	0
White	4,514	7,033	0
Black / African American	105	194	0
Asian	35	105	0
American Indian, Alaska Native	0	12	0
Pacific Islander	0	40	0
Hispanic	458	343	0
HOME Consortium Households			
Jurisdiction as a whole	8,902	16,596	0
White	7,906	15,386	0
Black / African American	189	233	0
Asian	130	119	0
American Indian, Alaska Native	0	16	0
Pacific Islander	0	40	0
Hispanic	646	669	0
Note: The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden greater than 50%.			
Data Source: 2016-2020 CHAS			

50%-80% of Area Median Income

Table 18. Severe Housing Problems 50 - 80% AMI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Waukesha County Households			
Jurisdiction as a whole	3,208	18,473	0
White	2,928	17,127	0
Black / African American	15	169	0
Asian	79	304	0
American Indian, Alaska Native	0	29	0
Pacific Islander	0	0	0
Hispanic	154	741	0
HOME Consortium Households			
Jurisdiction as a whole	5,210	38,031	0
White	4,801	35,315	0
Black / African American	75	379	0
Asian	94	381	0
American Indian, Alaska Native	0	37	0
Pacific Islander	0	4	0
Hispanic	202	1,609	0
Note: The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden greater than 50%.			
Data Source: 2016-2020 CHAS			

80%-100% of Area Median Income

Table 19. Severe Housing Problems 80 - 100% AMI

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Waukesha County Households			
Jurisdiction as a whole	722	14,891	0
White	611	14,006	0
Black / African American	20	172	0
Asian	15	165	0
American Indian, Alaska Native	0	8	0
Pacific Islander	0	0	0
Hispanic	55	380	0
HOME Consortium Households			
Jurisdiction as a whole	1,407	27,829	0
White	1,199	26,256	0
Black / African American	50	221	0
Asian	33	282	0
American Indian, Alaska Native	0	60	0
Pacific Islander	0	0	0
Hispanic	93	741	0
Note: The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden greater than 50%.			
Data Source: 2016-2020 CHAS			

NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

Housing Cost Burden

Table 20. Greater Need: Housing Cost Burdens AMI

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Waukesha County Households				
Jurisdiction as a whole	118,681	21,433	15,676	739
White	109,940	19,772	14,074	721
Black / African American	991	349	385	0
Asian	3,247	349	343	4
American Indian, Alaska Native	130	12	20	0
Pacific Islander	0	40	0	0
Hispanic	3,363	812	721	14
HOME Consortium Households				
Jurisdiction as a whole	213,761	40,202	28,809	1,670
White	199,988	37,524	26,420	1,650
Black / African American	1,820	501	539	0
Asian	4,130	439	517	4
American Indian, Alaska Native	326	44	20	0
Pacific Islander	0	44	0	0
Hispanic	5,762	1,421	1,080	18
<i>Data Source: 2016-2020 CHAS</i>				

NA-35 Public Housing - 91.405, 91.205 (b)

Introduction

Residents of Waukesha, Jefferson, Ozaukee, and Washington Counties are served by the Waukesha Housing Authority, Jefferson Housing Authority, West Bend Housing Authority (Washington County), Slinger Housing Authority (Washington County), Watertown Housing Authority (Jefferson County), and Lake Mills Housing Authority (Jefferson County). According to HUD's internal data, there are currently 248 public housing units, 780 tenant-based rental assistance units, and 2 VASH units in use within Waukesha County. Within the entire HOME Consortium, which includes Waukesha, Jefferson, Washington, and Ozaukee Counties, there are a total of 423 public housing units, 907 tenant-based rental assistance units, 2 VASH units, and 77 Section 811 (supportive housing for persons with disabilities) units in use. Overall, 73% of the Consortium's publicly supported units in use are within Waukesha County.

Additional HUD data indicates that 76 public housing households and 312 voucher households in Waukesha County have a household member with at least one disability; in the entire Consortium, these numbers rise to 116 public housing households and 409 voucher households. White residents make up the majority of all publicly supported housing residents, accounting for 87% of such residents in Waukesha County and 89% of such residents in the overall Consortium. Black residents account for 12% of publicly supported residents in Waukesha County and just under 10% in the overall Consortium. Hispanic residents make up 5-6% of publicly supported residents in both jurisdictions, while residents of other races are present only in extremely limited numbers.

Note that this discussion includes only rental assistance provided through local housing authorities and does not include tenant-based rental assistance provided through the HOME Consortium's TBRA program.

Totals in Use

Table 21. Public Housing by Program Type

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled
Housing Authorities in Waukesha County									
Number of units/vouchers in use	0	0	248	782	0	780	2	0	0
Housing Authorities in the HOME Consortium									
Number of units/vouchers in use	0	0	423	986	0	907	2	0	77
Disabled vouchers Include Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition vouchers. Note that this table includes only rental assistance provided through local housing authorities and does not include tenant-based rental assistance provided through the HOME Consortium's TBRA program.									
Data Source: PIC (PIH Information Center)									

Characteristics of Residents

Table 22. Characteristics of Public Housing Residents by Program Type

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project -based	Tenant -based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Housing Authorities in Waukesha County								
Number of people homeless at admission	0	0	0	0	0	0	0	0
Elderly program participants (>62)	0	0	69	257	0	256	1	0
Disabled families	0	0	76	312	0	311	1	0
Families requesting accessibility features	0	0	248	782	0	780	2	0
Program participants with HIV/AIDS	0	0	0	0	0	0	0	0
Domestic violence victims	0	0	0	0	0	0	0	0
Housing Authorities in the HOME Consortium								
Number of people homeless at admission	0	0	13	28	0	26	0	0
Elderly program participants (>62)	0	0	180	318	0	304	1	0
Disabled families	0	0	116	409	0	344	1	0
Families requesting accessibility features	0	0	423	986	0	907	2	0
Program participants with HIV/AIDS	0	0	0	0	0	0	0	0
Domestic violence victims	0	0	0	0	0	0	0	0
Data Source: PIC (PIH Information Center) Note that this table includes only rental assistance provided through local housing authorities and does not include tenant-based rental assistance provided through the HOME Consortium's TBRA program.								

Race of Residents

Table 23. Race of Public Housing Residents by Program Type

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled
Housing Authorities in Waukesha County									
White	0	0	213	681	0	679	2	0	0
Black/African American	0	0	31	95	0	95	0	0	0
Asian	0	0	3	4	0	4	0	0	0
American Indian/Alaska Native	0	0	1	1	0	1	0	0	0
Pacific Islander	0	0	0	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0
Housing Authorities in the HOME Consortium									
White	0	0	385	874	0	798	2	0	74
Black/African American	0	0	32	105	0	102	0	0	3
Asian	0	0	4	4	0	4	0	0	0
American Indian/Alaska Native	0	0	2	2	0	2	0	0	0
Pacific Islander	0	0	0	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0
Disabled vouchers Include Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition vouchers. Note that this table includes only rental assistance provided through local housing authorities and does not include tenant-based rental assistance provided through the HOME Consortium's TBRA program. <i>Data Source: PIC (PIH Information Center)</i>									

Ethnicity of Residents

Table 24. Ethnicity of Public Housing Residents by Program Type

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled
Housing Authorities in Waukesha County									
Hispanic	0	0	18	41	0	41	0	0	0
Not Hispanic	0	0	230	741	0	739	2	0	0
Housing Authorities in the HOME Consortium									
Hispanic	0	0	23	43	0	42	0	0	1
Not Hispanic	0	0	400	943	0	865	2	0	76

Disabled vouchers include Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition vouchers. Note that this table includes only rental assistance provided through local housing authorities and does not include tenant-based rental assistance provided through the HOME Consortium's TBRA program.

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units.

According to HUD data, 37-38% of publicly supported households in both Waukesha County and the HOME Consortium have at least one member with a disability. Based on 2019 research conducted by the Joint Center for Housing Studies of Harvard University, needs for accessible units most often include entrance requirements (ground floor entry or wider entryways) and bathroom accommodations.

Data on demographics of residents on waiting lists is unavailable; however, APSH data for Waukesha County shows that the average wait time is 13 months for HCV applicants and 30 months for publicly supported housing applicants. Additionally, APSH data shows only a 72% utilization rate for Housing Choice Vouchers in Waukesha County, indicating that barriers may be present which prevent voucher holders from using their vouchers. These barriers may include factors like a lack of available housing, a need to rehabilitate existing housing to meet HCV requirements, and discrimination from landlords against tenants receiving housing assistance. Note that these figures include only rental assistance provided through local housing authorities and do not include TBRA provided through the HOME Consortium.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

Data on demographics of residents on waiting lists is unavailable; however, APSH data for Waukesha County shows that the average wait time is 13 months for HCV applicants and 30 months for publicly supported housing applicants. Consolidated Plan community engagement efforts revealed that public housing residents and HCV holders are in immediate need of safe, affordable housing in good condition. For HCV holders, finding property owners that accept tenants on voucher assistance is a common challenge. Residents receiving housing assistance often need additional supportive services that include mental health services, food, legal services, transportation services, childcare, and healthcare. General opportunities to attain a level of financial stability and professional skills, as well as resources in areas such as job training and employment assistance are also needed.

How do these needs compare to the housing needs of the population at large?

The needs of public housing residents and voucher holders are different from those of the Consortium's overall low- and moderate-income population primarily in that these residents are stably housed in housing they can afford. With this need met, residents can work on other needs that low- to moderate-income families typically face in addition to housing insecurity.

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

Introduction

This section discusses the size and characteristics of the population experiencing homelessness in Waukesha County and the HOME Consortium, which fall under the Wisconsin Balance of State Continuum of Care. Each year, the Continuum of Care directs a Point-in-Time (PIT) count of people experiencing homelessness throughout the region on one night in January. This count is conducted for the entirety of the Wisconsin Balance of State Continuum of Care and is not exclusive to Waukesha County or the HOME Consortium, so information exclusive to the Consortium may be unavailable in some areas. The Institute for Community Alliances provides supplemental data specific to county, which is discussed below.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

The tables below depict homelessness as assessed by the 2023 Point-In-Time count for Wisconsin's Balance of State Continuum of Care, which includes but is not limited to Waukesha County and the HOME Consortium. According to this count there were 2,940 people experiencing homelessness in counties covered by the Balance of State CoC in 2023, a 4% decrease from the previous year but a nearly 9% increase since January 2020, just before the COVID-19 pandemic. Of these, 302 were considered chronically homeless. HUD defines chronic homelessness in the following way:

- A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:
 - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and
 - Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described, or
- An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility; or

- A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

The count also identified 367 households with children under age 18 who were homeless and 31 unaccompanied children under 9 who were homeless; 1,667 adult-only homeless households; 126 youth aged 18-24; 264 homeless survivors of domestic violence; 176 homeless veterans; 6 homeless people with HIV/AIDS; 462 homeless people with a severe mental illness; and 262 people with chronic substance abuse problems. Note that some people may be counted in multiple categories – for example, a person may fall into both the severe mental illness and chronic substance abuse categories. Data on average number of days people experienced homelessness was not available.

Nature and Extent of Homelessness

Table 25. Point-in-Time Homeless Count

Sub-Group	Number of people experiencing homelessness on a given night		
	Sheltered	Unsheltered	Total
Households with adults & children	363	4	367
Households with adults only	1,433	244	1,677
Unaccompanied children under 18	9	0	9
Unaccompanied youth aged 18-24	109	17	126
Veterans	170	6	176
Chronically homeless	304	28	332
Domestic violence survivors	257	7	264
People with HIV/AIDS	6	0	6
People with severe mental illness	427	35	462
People with chronic substance abuse	247	15	262

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

As shown above, the 2023 Wisconsin Balance of State PIT Count found 367 homeless households with children, 4 of whom were unsheltered, and 176 veteran households, 6 of whom were unsheltered. The fact that the overwhelming majority of such households are sheltered but a large number still exist as homeless indicates a need for more transitional

housing options and programs to help both veterans and families with children exit homelessness.

Describe the nature and extent of homelessness by racial and ethnic group.

The 2023 Point-in-Time Count for the Wisconsin Balance of State CoC provided data on homelessness by racial and ethnic group, as shown in the following table. Of the people found to be homeless in January of 2023, approximately 65.7% were white, 20.5% were Black, 9.0% were Hispanic or Latino, 1.5% were Asian or Pacific Islander, 6.3% were Native American, and 5.9% were of multiple or other races. This data may be compared to the overall racial and ethnic composition of the State of Wisconsin, which the U.S. Census Bureau reports as 80.4% white, 6.0% Black, 7.6% Hispanic or Latino, 2.9% Asian or Pacific Islander, 0.8% Native American, and 2.0% people of other or multiple races. In comparison to their population share for the state of Wisconsin, Black, Native American, Asian or Pacific Islander residents, and residents of multiple or other races are disproportionately more likely to be homeless.

Table 26. Homelessness by Race and Ethnicity in the Wisconsin Balance of State Continuum of Care

Race	Sheltered	Unsheltered
Black/African American	569	34
White	1,728	205
Asian	30	5
American Indian/Alaska Native	174	12
Native Hawaiian/Pacific Islander	10	0
Multiple Races	161	12
Ethnicity	Sheltered	Unsheltered
Hispanic/Latino	251	15
Not Hispanic/Latino	2,421	253
Source: HUD PIT Count Data – Wisconsin Balance of State Continuum of Care		

Describe the nature and extent of unsheltered and sheltered homelessness.

The 2023 Point-in-Time Count for the Wisconsin Balance of State CoC found 2,672 sheltered and 268 unsheltered homeless individuals as of January 2023, meaning that around 9% of all homeless individuals within the CoC are unsheltered. A low proportion of unsheltered individuals coupled with a high overall number of homeless individuals indicates a greater need for expanded transitional housing and resources to help people exit homelessness.

Discussion

In addition to data presented by the Balance of State Continuum of Care Point-In-Time Count, the Institute for Community Alliances maintains some data on homelessness specific to county in Wisconsin. The available data on homelessness from the ICA is presented below.

Table 27. Homelessness by Race and Ethnicity in the Wisconsin Balance of State Continuum of Care

County	Sheltered	Unsheltered	Total
Waukesha County	152	11	163
Washington County	50	2	52
Jefferson County	31	1	32
Ozaukee County	9	0	9
Consortium Total	242	14	256

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)

Introduction

This section discusses the characteristics and needs of people in various subpopulation in the HOME Consortium who may require supportive services, including people with HIV/AIDS, seniors, people with disabilities (mental, physical, or developmental), people with alcohol or drug addiction, and survivors of domestic violence.

Describe the characteristics of special needs populations in your community.

Elderly and Frail Elderly

According to 2018-2022 American Community Survey estimates, about 19.5% of Waukesha County’s population is elderly (age 65 and over) and about 8.1% of the population is considered frail elderly (age 75 and over). About 26.2% of individuals aged 65 and over and 39.7% of individuals aged 75 and over have one or more disabilities (from ACS tables S0101 and S1810).

In the overall HOME Consortium, Washington County contains a higher share of elderly residents with disabilities, accounting for 26.8% of its residents aged 65 and older and 41.1% of its residents aged 75 and older. While Washington County has the highest share of its population that is aged 65 and older, Waukesha County has a higher share of its population that is considered frail elderly. Ozaukee County has the second highest share of frail elderly residents, accounting for 8.9% of its population.

Table 28. Homelessness by Race and Ethnicity in the Wisconsin Balance of State Continuum of Care

County	Elderly Population 65 or Older	Elderly Population 65 or Older with a Disability	Elderly Population 75 or older	Elderly Population 75 or Older with a Disability
Waukesha County	19.50%	26.2%	8.10%	39.7%
Washington County	17.6%	25.7%	6.9%	34.0%
Jefferson County	20.6%	24.9%	8.9%	36.4%
Ozaukee County	18.7%	26.8%	7.6%	41.1%
Data Source: 2018-2022 ACS				

People with Disabilities

Waukesha County is home to an estimated 38,736 residents with disabilities, representing approximately 9.6% of the population, which is the lowest rate of residents with a disability among all other counties represented in the HOME Consortium. Jefferson County contains the highest rate of residents with a disability (11.7%), followed by Ozaukee County (10.0%), and Washington County (9.7%). These percentages are slightly lower than the overall disability rate in the state of Wisconsin, which is 11.9%.

People with HIV/AIDS and Their Families

According to AIDSVu¹, an interactive mapping tool from Emory University's Rollins School of Public Health, an estimated 51 out of every 100,000 people in Waukesha County were living with HIV as of 2022. Jefferson County has a higher share of people diagnosed with HIV, with a rate of 56 out of every 100,000 people. An estimated 47 out of every 100,000 people in Washington County are diagnosed with HIV, followed by 44 out of every 100,000 people living in Ozaukee County.

Persons with Alcohol or Drug Addiction

The state of Wisconsin had an estimated 17.7% rate of substance use disorder in the past year for individuals aged 12 and older, according to 2021-2022 data from the U.S. Substance Abuse & Mental Health Data Archive (SAMHDA). In Waukesha County, in 2023, 68.0% of drug-related deaths in the county involved fentanyl². According to the Wisconsin Department of Health Services, in 2022, Jefferson County had the highest number of people (747 people) who received services for substance use, majority of whom sought services due to alcohol use, compared to other counties in the HOME Consortium³. There were an estimated 610 people served in Waukesha County, followed by 450 people in Washington County, and 26 people in Ozaukee County.

Survivors of Domestic Violence

The National Coalition Against Domestic Violence documented that the National Domestic Violence Hotline received 2,153 contacts from Wisconsin in 2019⁴.

FOOTNOTES

¹ AIDSVU: Mapping the HIV epidemic in the United States. (n.d.). Map - AIDSVu. <https://map.aidsvu.org/prev/county/rate/none/none/usa?geoContext=national>

² Waukesha County, Overdose Response Dashboard. Retrieved from: <https://www.waukeshacounty.gov/overdosedata>

³ Wisconsin Department of Health Services. Substance Use, County Services Dashboard. Retrieved from: <https://www.dhs.wisconsin.gov/aoda/county-services-dashboard.htm>

⁴ National Coalition Against Domestic Violence in Wisconsin. Retrieved from: <https://assets.speakcdn.com/assets/2497/wisconsin-202101912193401.pdf>

According to the 2022 Wisconsin Domestic Violence Homicide Report, 96 individuals died in Wisconsin due to domestic violence at a rate of approximately 1 death every 3.8 days⁵.

Currently, Wisconsin is facing a funding crisis due to the June 2023 decision made by the Joint Finance Committee to cut the significant increases in funding for sexual assault and domestic violence services proposed by Governor Evers. The 2023-2029 Long-Range Plan to Address Sexual and Domestic Violence Statewide will help to identify present needs and provide recommendations and set priorities for service providers and key stakeholders throughout the state. The report will also focus on the needs of victims from marginalized backgrounds as well as LGBTQ+ victims⁶.

What are the housing and supportive service needs of these populations and how are these needs determined?

The primary housing and supportive service needs of these subpopulations (the elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, survivors of domestic violence, and reentry populations) were determined by input from housing and service providers and the public through public meetings and stakeholder interviews, as well as through a review of research on housing and service needs of specific populations.

Housing that is Affordable, Accessible, Safe, and Low-Barrier

Residents with special needs often live at or below the federal poverty level. High housing costs make it difficult for these populations to afford housing. Low incomes force many residents to live in congregate care, have roommates, or live with family. HUD's fair market rent documentation for FY 2024 estimates fair market rent for a two-bedroom unit at \$1,257 per month in Waukesha County, Jefferson County, and Ozaukee County⁷. The FMR rate for the same size unit in Jefferson County is estimated slightly lower than the rest of the HOME Consortium at \$1,122 per month.

There is a need to increase the availability of affordable housing for populations with special needs. This could include options such as smaller housing units; multifamily 'missing middle' housing, including duplexes, triplexes, quadraplexes, and other small multifamily units; accessory dwelling units; cohousing with shared services; and other housing types that support increased levels of affordability.

Housing may be inaccessible to populations with special needs for a variety of reasons. Persons with disabilities may find that their housing options are not ADA compliant or are

FOOTNOTES

⁵ End Domestic Abuse Wisconsin. 2022 Homicide Report. Retrieved from: <https://edaw-webinars.s3.us-east-2.amazonaws.com/wp-content/uploads/2023/10/16123358/2022-Wisconsin-Domestic-Violence-Homicide-Report.pdf>

⁶ 2023-2029 Long-Range Plan, Addressing Sexual and Domestic Violence in Wisconsin. Retrieved from: <https://antiviolenacewi.org/wp-content/uploads/2023/06/Long-Range-Plan-2023-2029.pdf>

⁷ HUD Exchange FMR Lookup. Retrieved from: <https://m.huduser.gov/fmril/#datapage>

outside the service range for public transportation. People living with HIV/AIDS, immigrants and refugees, people with criminal histories, and other populations with special needs are often discriminated against in housing application processes. Community members noted that housing accessible to people exiting incarceration or having criminal histories is especially lacking. People living with HIV/AIDS have a particular need for low-barrier housing that is free from requirements surrounding drug testing, sobriety, criminal background, and medical appointments. For these reasons, there is a need to ensure that accessible, low-barrier housing is available and to take actions to reduce discrimination, such as providing fair housing services.

The elderly, people with disabilities, and others who may not have access to vehicles often need housing that is accessible to transportation, recreation, and employment. These populations need housing options that are integrated into the community to provide access to needed services and to reduce social isolation. Like other populations with special needs, people living with HIV/AIDS also need housing that provides easy access to health services, resources, and employment.

Housing that is safe and clean is another need for people with special needs. Units that are not clean or have other unhealthy conditions can worsen health issues for people who are already vulnerable.

Transportation

Access to transportation is an important concern for people with special needs. People with disabilities and others who may not have access to vehicles need housing close to transportation services to access employment, health services, and recreation opportunities. Persons with HIV/AIDS need housing nearby transportation services to access health services and other resources. If transit is not within walking distance, special needs populations require accessible, reliable transportation services to provide access to everyday needs. Stakeholders noted a need for improved transit reliability and better facilities at transit stops (i.e., benches or bus shelters).

Specialized Housing and Services

Specialized housing addresses the needs of specific populations. People with physical, intellectual, or developmental disabilities; people living with HIV/AIDS; and people with alcohol or drug addiction have specific housing needs that may be addressed through housing with wraparound services, such as case management, life skills programming, and health services. The Housing First model emphasizes that supportive services should not be required for people to access housing. Case management was a key need identified by stakeholders related to reducing or preventing homelessness for many subpopulations. 60.8% of community members surveyed in Waukesha County noted that there is a high need for transitional and supportive housing programs in the county and 64.7% noted there is a high need for permanent housing.

Workforce Development and Employment Services

Special needs populations may also need workforce development and employment services. These programs may include employment navigation, job training, education, transportation services, and case management focused on employment, among others.

Physical and Mental Healthcare Access

Access to healthcare is a need for special needs populations, as they are more likely to experience barriers such as economic disadvantage; medical issues and disability; language and literacy age; and cultural, geographic, or social isolation. To increase access to healthcare, it is important for local governments and stakeholders to take steps to define, locate, and reach at-risk populations.

Education and Combating Stigmas

Combating stigmas is an important concern for people with special needs. For adults with criminal histories and people living with HIV/AIDS, discrimination may make accessing adequate housing difficult. Further, a lack of understanding regarding the transmission of HIV may cause people to lose housing or employment, thus increasing the risk of homelessness.

Outreach

Outreach to special needs populations to ensure they are aware of available services is another need. Clarity in marketing and in public buildings about what services are available is important in supporting awareness of available services among vulnerable populations. Outreach also includes the development of relationships and trust so that people feel comfortable seeking out needed services.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area.

The state of Wisconsin had an estimated 17.7% rate of substance use disorder in the past year for individuals aged 12 and older, according to 2021-2022 data from the U.S. Substance Abuse & Mental Health Data Archive (SAMHDA). In Waukesha County, in 2023, 68.0% of drug-related deaths in the county involved fentanyl⁸. According to the Wisconsin Department of Health Services, in 2022, Jefferson County had the highest number of people (747 people) who received services for substance use, majority of whom sought services due to alcohol use, compared to other counties in the HOME Consortium⁹. There were an estimated 610 people served in Waukesha County, followed by 450 people in Washington County, and 26 people in Ozaukee County.

FOOTNOTES

⁸ Waukesha County, Overdose Dashboard. Retrieved from: <https://www.waukeshacounty.gov/overdosedata>

⁹ Wisconsin Department of Health Services. Substance Use, County Services Dashboard. Retrieved from: <https://www.dhs.wisconsin.gov/aoda/county-services-dashboard.htm>

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Not applicable.

DRAFT

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

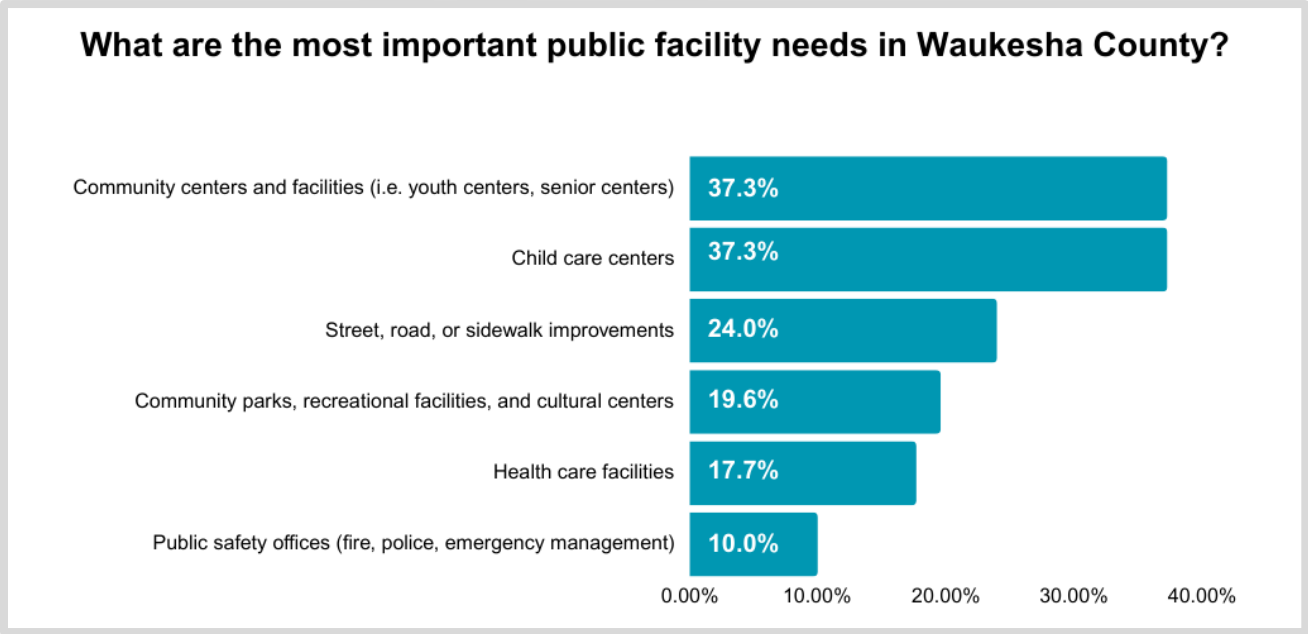
Describe the jurisdiction’s need for public facilities.

Buildings open to the general public or for use by target special needs populations, whether owned by the government or by nonprofit organizations, may be considered public facilities under the CDBG program. Community survey participants were asked to identify what their top 3 most important public facility needs in Waukesha County were with the following top three responses: (1) community centers and facilities (i.e., youth centers, senior centers); (2) childcare centers; and (3) street, road, or sidewalk improvements. These facilities were each selected as a high need by more than half of survey takers (see Figure 1).

Input from stakeholder meetings and the community survey supported survey findings. Common needs identified by stakeholders included:

- Homeless centers with wraparound services
- Improvements to existing facilities/improvements to ADA accessibility
- Childcare centers
- Transitional/supportive housing programs

Figure 1. Public Facility Needs Identified in the Community Survey



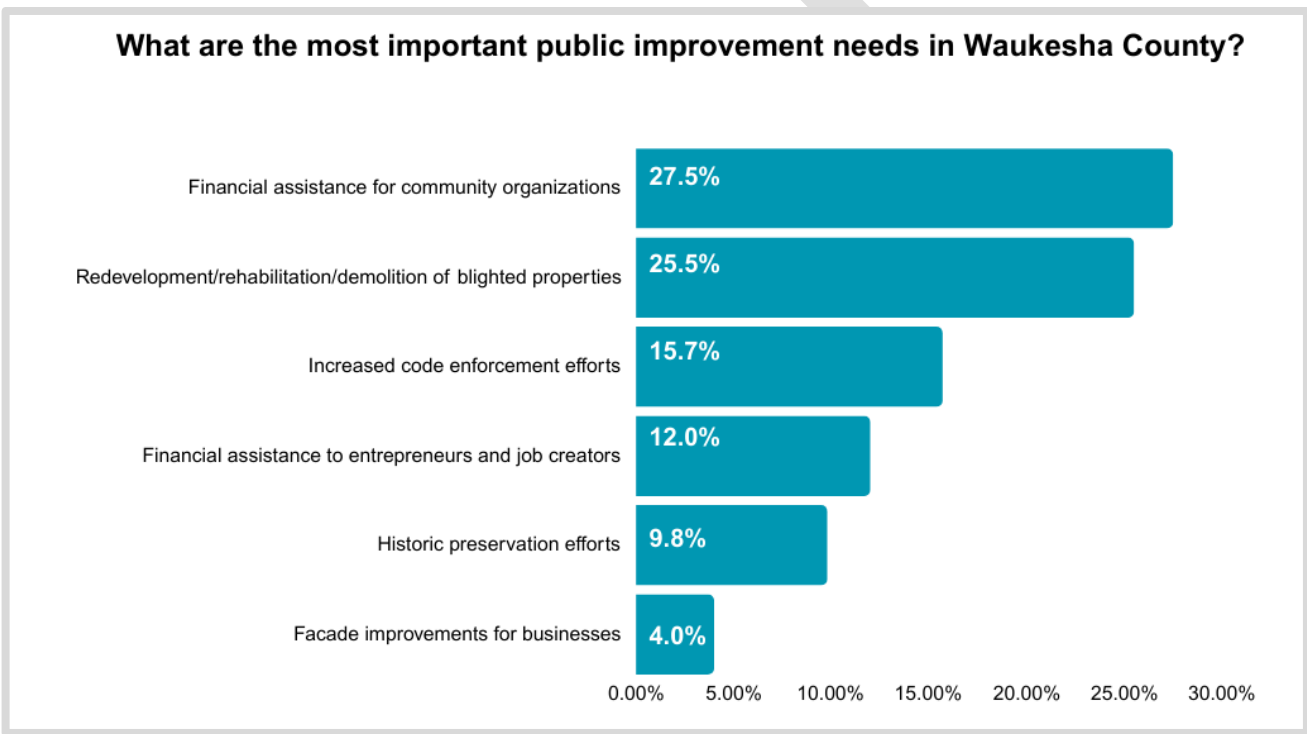
How were these needs determined?

Waukesha County’s public facility needs were determined based on local input obtained through the community survey and stakeholder meetings. About 52 residents and stakeholders participated in community engagement activities for the Consolidated Plan. Needs were also determined through a review of other local plans and studies, including the Waukesha County 2023 Housing Study.

Describe the jurisdiction’s need for public improvements.

Survey respondents were also asked to rank public improvement needs in Waukesha County. The top three responses were: (1) financial assistance for community organizations, (2) redevelopment/rehabilitation/demolition of blighted properties, and (3) increased code enforcement efforts, (See Figure 2). Community meeting, focus group attendees, and interview participants emphasized the need for housing at all income levels.

Figure 2. Public Improvement Needs Identified in the Community Survey



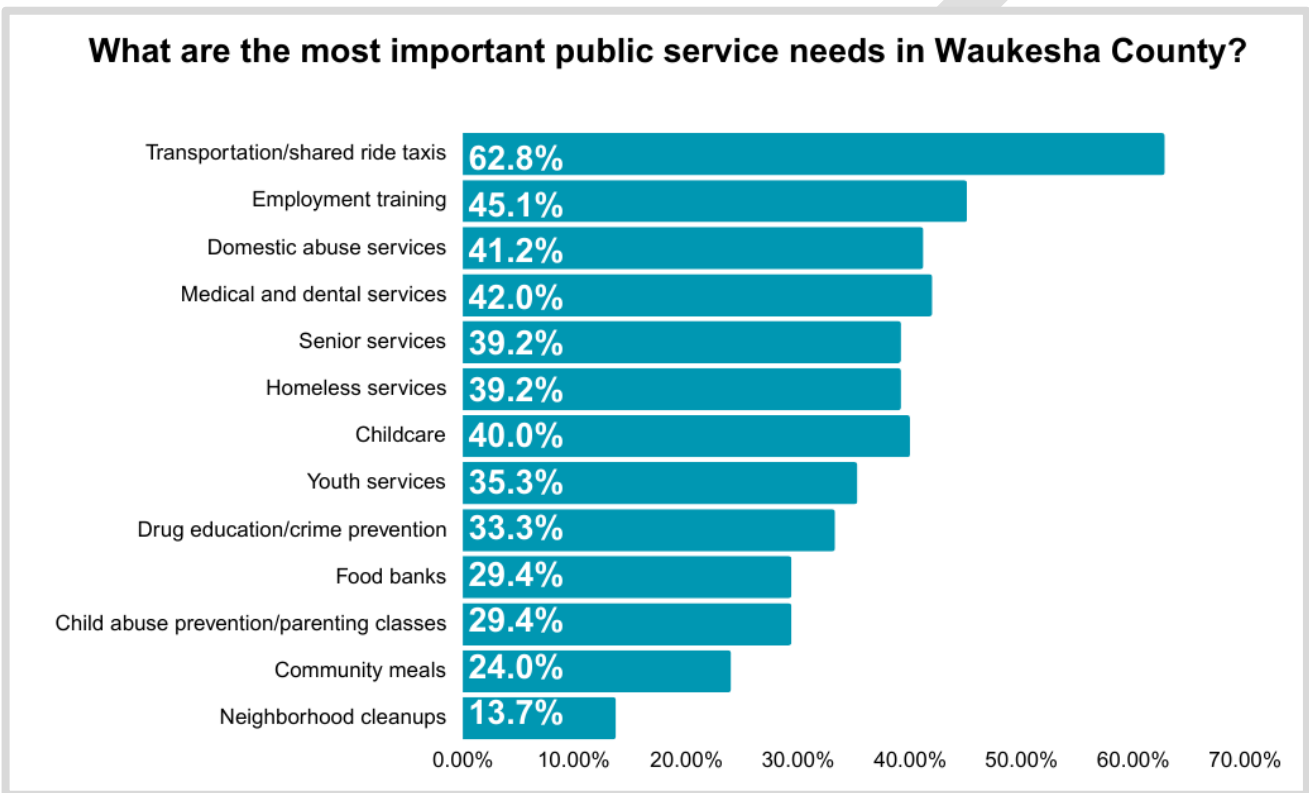
How were these needs determined?

Waukesha County’s public facility needs were determined based on local input obtained through the community survey and stakeholder meetings. About 50 residents and stakeholders participated in community engagement activities for the Consolidated Plan. Needs were also determined through a review of other local plans and studies, including the Waukesha County 2023 Housing Study.

Describe the jurisdiction’s need for public services.

The top three public service needs selected by respondents to the Community Survey include: (1) transportation and/or shared ride taxis, (2) employment training, and (3) domestic abuse services. Other needs that were identified during community engagement events included services for people with disabilities, job training, senior services/programs, and youth services/programs.

Figure 3. Public Service Needs Identified in the Community Survey



How were these needs determined?

Waukesha County’s public facility needs were determined based on local input obtained through the community survey and stakeholder meetings. About 50 residents and stakeholders participated in community engagement activities for the Consolidated Plan. Needs were also determined through a review of other local plans and studies, including the Waukesha County 2023 Housing Study.

HOUSING MARKET ANALYSIS

MA-05 Overview

Housing Market Analysis Overview

Housing choices are often limited by household income. A lack of affordable housing in an area may also create significant hardships for low- and moderate-income households. Households that spend more than 30% of income on housing are considered 'housing cost burdened and may have difficulty affording other necessities, such as food, clothing, and childcare. Data examined in the following sections shows that there is a lack of rental and for-sale housing in the Consortium that is affordable to residents with very low incomes, and a significant proportion of households are cost-burdened or severely cost-burdened by housing costs.

In addition to affordability, the housing market may also be impacted by accessibility concerns. Factors other than cost that can impact a person's ability to access housing may include the condition of available housing, the amount of available housing, the size and type of available housing units, and more.

In addition to reviewing current housing market conditions, this section analyzes the availability of assisted and public housing and facilities to serve homeless individuals and families. It also analyzes local economic conditions and summarizes existing economic development resources and programs that may be used to address community and economic development needs identified in the Needs Assessment.

MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2)

Introduction

The 2016-2020 Five-Year American Community Survey estimated that there were 151,088 housing units in Waukesha County and 289,947 housing units in the overall HOME Consortium (Table 29). There are significantly more single-family units (74%) than multifamily (25%) in both jurisdictions. The largest share of units are single-family detached structures (67%) while attached single units (townhomes) make up a much smaller share of the stock (7%) in both jurisdictions. Mid- and large-sized apartment complexes - or those with 5 or more units - make up 18-19% of the housing stock in both jurisdictions. Duplexes, triplexes, and fourplexes are less common, making up 6-7% of all housing stock. Finally, atypical units like mobile homes, RVs, boats, and vans make up only 1% of the housing stock in both jurisdictions.

As Table 30 shows, around 71% of Waukesha County households and 70% of households in the overall Consortium are homeowner-occupied, while 29/30% are renters. Homeowner-occupied housing tends to be larger than renter-occupied housing: only 1% of homeowners live in a home with fewer than two bedrooms, while 24-27% of renters live in a home this size.

Residential Properties by Number of Units

Table 29. Residential Properties by Unit Number

Property Type	Number	Percent
Housing Units in Waukesha County		
1-unit detached structure	100,920	67%
1-unit, attached structure	10,202	7%
2-4 units	9,315	6%
5-19 units	13,987	9%
20 or more units	15,802	10%
Mobile Home, boat, RV, van, etc	862	1%
Total	151,088	100%
Housing Units in the HOME Consortium		
1-unit detached structure	195,545	67%
1-unit, attached structure	19,288	7%
2-4 units	20,651	7%
5-19 units	27,557	10%
20 or more units	23,574	8%
Mobile Home, boat, RV, van, etc	3,332	1%
Total	289,947	100%
<i>Data Source: 2016-2020 ACS</i>		

Unit Size by Tenure

Table 30. Unit Size by Tenure

	Owners		Renters	
	Number	Percent	Number	Percent
Housing Units in Waukesha County				
No bedroom	23	0%	1,739	5%
1 bedroom	1,173	1%	9,988	27%
2 bedrooms	14,055	13%	19,134	51%
3 or more bedrooms	92,089	86%	6,499	17%
Total	107,340	100%	37,360	100%
Housing Units in the HOME Consortium				
No bedroom	128	0%	2,776	4%
1 bedroom	2,003	1%	17,483	24%
2 bedrooms	29,013	14%	35,880	49%
3 or more bedrooms	172,416	85%	16,370	23%
Total	203,560	100%	72,509	100%
<i>Data Source: 2016-2020 ACS</i>				

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The internal HUD data depicted in section NA-35 shows that there are 248 public housing units, 780 tenant-based rental assistance units, and 2 VASH units within Waukesha County. Within the entire HOME Consortium, which includes Waukesha, Jefferson, Washington, and Ozaukee Counties, there are a total of 423 public housing units, 907 tenant-based rental assistance units, 2 VASH units, and 77 Section 811 (supportive housing for persons with disabilities) units. Overall, 73% of the Consortium's publicly supported units are within Waukesha County.

Of these subsidized housing options, public housing, Project-Based Section 8, and Housing Choice Vouchers are targeted towards any low-income residents, while Section 811 units are reserved for disabled low-income residents and VASH units for veterans. APSH data indicates that the average time on the waitlist for a voucher unit is 13 months, and the average wait time for a public housing unit is 30 months. Notably, the most recent APSH data reports that only 72% of Waukesha County's Housing Choice Vouchers are currently in use. This may indicate

that residents with HCVs could struggle to find landlords willing to accept the vouchers. Data on these low rates of voucher utilization coupled with long waitlists may also indicate a major need for rehabilitation of existing units to restore them to usable condition.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The Waukesha Housing Authority has not published information on expected or upcoming unit loss.

Does the availability of housing units meet the needs of the population?

Throughout the Consolidated Planning process, the most common feedback received from residents and stakeholders was that there is a severe shortage of all housing types both Waukesha County and in the overall HOME Consortium. Vacancy data from the U.S. Census Bureau's American Community Survey confirms this, showing extremely low vacancy rates of 3.6%-6.5% throughout the HOME Consortium as of 2022. Washington County had the lowest vacancy rate in the HOME Consortium, while Jefferson County had the highest. In comparison, the average Wisconsin vacancy rate is 11.3% and the average U.S. vacancy rate is 10.8%.

Very low vacancy rates often indicate that there is not enough housing to meet the needs of a population. While overly high vacancy rates can be undesirable, extremely low vacancy rates such as those seen in the Consortium tend to exacerbate existing housing problems by greatly increasing the competition for existing housing. This often results in increased barriers to housing access for the lowest-income and most vulnerable residents, as increased competition drives up prices, allows landlords to be extremely picky when selecting tenants, and leads to an increase in residents living in sub-par housing conditions because it was the only housing available. Residents and stakeholders interviewed and surveyed as part of the community engagement process indicated that all of these issues are currently prevalent in the Consortium.

Describe the need for specific types of housing.

Data discussed in this and the following section indicates the need for rental housing for extremely low-income households. The greatest need is for affordable rental housing units, particularly units that are affordable to households with income at or below 30 percent of the area median income. The 2016-2020 ACS data shows that there are 3,645 households earning less than 30% of AMI in the HOME Consortium, while the HOME Consortium as a whole maintains only about 1,400 total subsidized units or vouchers. This means that extremely low-income residents who are unable to access a subsidized unit or voucher will likely face significant difficulty in finding affordable housing.

In addition, there is a significant need for the development of new housing at all income levels. Extremely low vacancy rates and feedback from residents and stakeholders indicate that a severe housing shortage throughout the HOME Consortium intensifies housing access and affordability issues for the area's lowest-income families. Increasing the HOME Consortium's housing stock with the provision of an affordable housing quota in new development will be key in expanding the accessibility and affordability of housing in the region.

DRAFT

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

Introduction

This section reviews housing costs and affordability in Waukesha County and the HOME Consortium. As Table 29 shows, median home value in Waukesha County was estimated at \$293,500 according to 2016-2020 ACS data. This represents an 18% increase in cost since 2009. The most up-to-date data shows that by 2022 median home value had abruptly risen further to \$352,600, a 20% increase in just two years and a 31% increase since 2009. Median rent in Waukesha County was \$951 per month in 2020, representing a 16% increase since 2009; between 2020 and 2022 median rent increased further to \$1,235 per month, an additional 30% increase since 2020 and an overall 51% increase since 2010. In contrast, Wisconsin minimum wage has not increased since the year 2009.

While there is a shortage of housing of all types, the most acute housing need in Waukesha County and the HOME Consortium is the availability of affordable rental housing. According to the National Low Income Housing Commission’s annual Out-Of-Reach Report, Waukesha County renters earning 30% AMI or less in 2023 would be able to afford a maximum rental payment of \$766 per month, while renters earning minimum wage would only be able to afford a maximum monthly rental payment of \$377 without becoming cost burdened. In contrast, 2022 ACS data shows that only 28% of all available rental units cost less than \$1,000 per month, and that just 4% cost less than \$500 per month. This is a significant decrease in unit affordability since the year 2020, as shown in Table 30.

Public engagement conducted as part of the Consolidated Plan process indicates a need for landlords who will accept rental assistance, which also points to the issue of affordability. Ability to afford housing is tied to other needs identified in the community, including homelessness, housing and services for people with disabilities, senior housing, and availability of housing for people re-entering the community from long-term care facilities or other institutions.

Cost of Housing

Table 31. Cost of Housing in Waukesha County

	Base Year: 2009	Most Recent Year: 2020	Percent Change
Median Home Value	\$249,300	\$293,500	18%
Median Contract Rent	\$818	\$951	16%
<i>Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)</i>			

Table 32. Rent Paid

Rent Paid	Number	Percent
Waukesha County Households		
Less than \$500	2,984	8.0%
\$500-999	18,311	49.1%
\$1,000-1,499	11,769	31.5%
\$1,500-1,999	2,779	7.4%
\$2,000 or more	1,449	3.9%
Total	37,292	99.9%
HOME Consortium Households		
Less than \$500	8,005	11.0%
\$500-999	41,060	56.6%
\$1,000-1,499	17,027	23.5%
\$1,500-1,999	3,948	5.4%
\$2,000 or more	2,344	3.2%
Total	72,384	99.8%
<i>Data Source: 2016-2020 ACS</i>		

Housing Affordability

Table 33. Housing Affordability

Number of Units Affordable to Households Earning	Renter	Owner
Housing Units in Waukesha County		
30% HAMFI	1,266	No Data
50% HAMFI	6,954	2,276
80% HAMFI	19,945	14,016
100% HAMFI	No Data	27,135
Total	28,165	43,427
Housing Units in the HOME Consortium		
30% HAMFI	3,645	No Data
50% HAMFI	18,435	6,456
80% HAMFI	42,218	32,682
100% HAMFI	No Data	58,230
Total	64,298	97,368
Data Source: 2016-2020 CHAS		

Monthly Rent

Table 34. Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Waukesha, Ozaukee, and Washington Counties					
Fair Market Rent	\$845	\$979	\$1,170	1460	1592
High HOME Rent	\$845	\$979	\$1,170	1460	1592
Low HOME Rent	\$845	\$957	\$1,148	1327	1481
Jefferson County					
Fair Market Rent	\$719	\$812	\$1,061	\$1,415	\$1,420
High HOME Rent	\$719	\$812	\$1,061	\$1,415	\$1,420
Low HOME Rent	\$719	\$812	\$1,061	\$1,305	\$1,420
Data Source: HUD 2024 FMR and HOME Rents					

Is there sufficient housing for households at all income levels?

Table 31 estimates the number of units in Waukesha County and the Consortium affordable to renters and owners at a variety of income levels, which can be compared to the number of households at each income level, as provided in Table 8 of the Needs Assessment.

According to these estimates, there are 22,080 households with incomes under 50% HAMFI in the Consortium, but only 6,456 rental units affordable at that income level are reported in Table 31. There is also a shortage of units affordable to households earning 80% or less HAMFI, although this shortage is less extreme. This shows that there is insufficient rental housing for households with low incomes. These figures do not take into account unit condition or size; nor do they reflect the possibility that a unit that would be affordable to a low- or moderate-income household may be unavailable to them because it is occupied by a higher income household.

The National Low Income Housing Coalition's Out of Reach data examines rental housing rates relative to income levels for counties and metro areas throughout the U.S. Wisconsin minimum wage is only \$7.25 per hour, meaning that a person would have to work 124 hours per week in order to afford an average two-bedroom rental unit. This equates to just over 3 full-time minimum wage jobs for a single householder, or 1.5 full-time minimum wage jobs each for a household with two wage earners.

How is affordability of housing likely to change considering changes to home values and/or rents?

As discussed previously in this section, costs for both renters and homeowners in Waukesha County and the HOME Consortium have risen rapidly since 2009: however, wage growth has not kept pace with the increase in housing costs. A state minimum wage that has remained stagnant since 2009 while housing costs have risen 30-50% in this same time period is particularly concerning. In addition, an overall lack of housing at all income levels within the Consortium intensifies barriers faced by low-income residents. Without targeted action to increase area wages, temper increases in housing costs, and increase the existing supply of housing at all income levels, housing in Waukesha County and the Consortium will continue to become increasingly unaffordable.

How do HOME rents/Fair Market Rent compare to area median rent? How might this impact your strategy to produce or preserve affordable housing?

Table 32 above shows HUD Fair Market Rents and HOME rents for the counties making up the HOME Consortium. The median contract rent of \$1,235 is below the fair market for rent for a two-bedroom housing unit. With only 28% of rents in Waukesha County under \$1,000 per

month, rental housing may be available at fair market rents for smaller units, but larger units may be more challenging.

Note that this data does not reflect housing condition, which is an important consideration. While the rent may be affordable, substandard housing conditions may make a unit unsafe or lead to exceptionally high utility costs, negating any savings in rent as compared to a more expensive unit.

DRAFT

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

Introduction

This section examines the condition of housing in Waukesha County and the HOME Consortium, including the presence of selected housing conditions: 1) lack of complete plumbing facilities, (2) lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. These conditions are designated as housing problems by HUD. This section also examines the age of housing stock, vacancy rate and suitability of vacant housing for rehabilitation, and the risk of lead-based paint hazards.

According to 2016-2020 ACS estimates, about 18% of owner units and just 40% of rental units have one of the selected housing conditions. CHAS data discussed in the Needs Assessment indicates that cost burden is by far the most common housing condition. About 2-3% of renter units have two or more selected conditions, and less than 1% had three conditions. For owners, less than 1% of units have two or three conditions. Rental units being more likely to have multiple conditions indicates that rental units are more prone to substandard physical conditions such as overcrowding or lack of complete kitchen or plumbing facilities,

Age of housing reflects periods of development in Waukesha County and the Consortium. Both jurisdictions contain significantly more owner than renter units, and age distribution of owner units in both jurisdictions is relatively similar. Renter units in Waukesha County are slightly newer than renter units in the overall Consortium, with 59% of Waukesha County rental units built after 1999 in comparison with 52% of Consortium rental units. In addition, owner-occupied homes trend slightly older in both jurisdiction than renter occupied homes. While some older homes may be well-maintained, the considerable share of housing built prior to 1980 indicates potential current or near future need for rehabilitation assistance. Additionally, housing units built prior to 1978 are typically at risk of lead-based paint exposure.

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation."

For the purpose of this Consolidated Plan, units are considered to be in "standard condition" if they meet HUD Section 8 housing quality standards. A unit is defined as "substandard" if it lacks complete plumbing, a complete kitchen, or heating fuel (or uses heating fuel that is wood, kerosene, or coal). A unit is "substandard but suitable for rehabilitation" if it lacks complete plumbing, a complete kitchen or a reliable and safe heating system but has some limited infrastructure that can be improved upon. These units are likely to have deferred maintenance and may have some structural damage such as leaking roofs, deteriorated interior surfaces, and inadequate insulation. They may not be part of public water or sewer systems but will have sufficient systems to allow for clean water and adequate waste disposal.

There are an estimated 12,662 vacant housing units in the HOME Consortium, about half of which are located within Waukesha County. The Consortium does not have counts of units that are substandard, substandard but suitable for rehabilitation, abandoned, or real estate owned (REO properties), as this would require evaluating units on a house-by-house basis. In general, however, units with more than one substandard condition and older units are more difficult to rehabilitate. A rough assessment of conditions can be made by considering housing age and absence of basic amenities.

Condition of Units

Table 35. Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	Percent	Number	Percent
Housing Units in Waukesha County				
With one selected Condition	19,305	18%	15,335	41%
With two selected Conditions	117	0%	1,025	3%
With three selected Conditions	35	0%	55	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	87,890	82%	20,905	56%
Total	107,347	100%	37,320	100%
Housing Units in the HOME Consortium				
With one selected Condition	35,989	18%	29,093	40%
With two selected Conditions	333	0%	1,518	2%
With three selected Conditions	67	0%	120	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	167,224	82%	41,773	58%
Total	203,613	100%	72,504	100%
<i>Data Source: 2016-2020 ACS</i>				

Year Unit Built

Table 36. Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Housing Units in Waukesha County				
2000 or later	19,953	19%	7,325	20%
1980-1999	31,979	30%	14,596	39%
1950-1979	44,238	41%	11,629	31%
Before 1950	11,132	10%	3,767	10%
Total	107,302	100%	37,317	100%
Housing Units in the HOME Consortium				
2000 or later	40,767	20%	12,790	18%
1980-1999	57,093	28%	24,922	34%
1950-1979	77,114	38%	23,900	33%
Before 1950	28,657	14%	10,840	15%
Total	203,631	100%	72,452	100%
Data Source: 2016-2020 CHAS				

Risk of Lead-Based Paint Hazard

Table 37. Risk of Lead-Based Paint

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	Percent	Number	Percent
Housing Units in Waukesha County				
Total Number of Units Built Before 1980	55,370	52%	15,396	41%
Housing Units Built Before 1980 with Children Present	9,599	9%	7,656	21%
Housing Units in the HOME Consortium				
Total Number of Units Built Before 1980	105,771	52%	34,740	48%
Housing Units Built Before 1980 with Children Present	18,079	9%	14,181	20%
<i>Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)</i>				

Vacant Units

Table 38. Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Housing Units in Waukesha County			
Vacant Units	N/A	N/A	6,541
Housing Units in the HOME Consortium			
Vacant Units	N/A	N/A	12,662
<i>Source: 2018-2022 ACS</i>			

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

Data regarding housing conditions indicates that around 2,000 housing units in the Consortium have at least two housing conditions, which are likely to include cost burdens and one other condition (overcrowding, lack of complete kitchen, or lack of complete plumbing). This indicates a need for rehabilitation and repair programs, particularly for renters, who make up the majority of the households with a secondary condition and who are frequently excluded from such programs. Additionally, a substantial portion of rental housing was built before 1980, and as this housing ages, maintenance needs will continue to grow.

Data indicates that owners are less likely to lack complete kitchens or plumbing, and therefore are less likely to live in substandard housing. However, housing age indicates that some owner-occupied units are at risk of deferred maintenance and may currently or soon require rehabilitation, as half of units were built prior to 1980. Additionally, seniors living on Social Security or retirement income may have paid off their mortgages but are now unable to afford necessary repairs and maintenance as their homes age.

Estimate the number of housing units within the jurisdiction that are occupied by low- or moderate-income families that contain lead-based paint hazards. 91.205(e), 91.405

Exposure to lead-based paint represents one of the most significant environmental threats from a housing perspective. Housing conditions can significantly affect public health, and exposure to lead may cause a range of health problems for adults and children. The major source of lead exposure comes from lead-contaminated dust found in deteriorating buildings, including residential properties built before 1978 that contain lead-based paint.

Unfortunately, measuring the exact number of housing units with lead-based paint hazards is difficult. However, risk factors for exposure to lead include housing old enough to have been initially painted with lead-based paint (i.e., pre-1978), households that include young children, and households in poverty. Table 35 identifies the total number of housing units built before 1980, and the total number of renter and owner units built before 1980 that house children under age 6. As shown, the latter includes 18,079 owner-occupied units (or 11% of total owner-occupied housing) and 14,181 renter-occupied units (or 12% of total renter-occupied housing) for a total of more than 32,000 households across the Consortium with at least two risk factors for exposure to lead-based paint.

MA-25 Public And Assisted Housing - 91.410, 91.210(b)

Introduction

Waukesha, Jefferson, Ozaukee, and Washington county residents are served by the Waukesha Housing Authority, Jefferson Housing Authority, West Bend Housing Authority (Washington County), Slinger Housing Authority (Washington County), Watertown Housing Authority (Jefferson County), and Lake Mills Housing Authority (Jefferson County). According to HUD's internal data, there are currently 265 public housing units and 880 tenant-based rental assistance units available within Waukesha County. Within the entire HOME Consortium, which includes Waukesha, Jefferson, Washington, and Ozaukee Counties, there are a total of 449 public housing units and 1,124 tenant-based rental assistance units available. Information on accessibility features of units was not available.

Totals Number of Units

Table 39. Total Number of Units by Program Type

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled
Housing Authorities in Waukesha County									
Number of units/vouchers available			265	880			0	0	0
Number of accessible units									
Housing Authorities in the HOME Consortium									
Number of units/vouchers available			449	1,124			0	0	0
Number of accessible units									
Disabled vouchers Include Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition vouchers. Note that this table includes only rental assistance provided through local housing authorities and does not include tenant-based rental assistance provided through the HOME Consortium's TBRA program.									
Data Source: PIC (PIH Information Center)									

Describe the supply of public housing developments.

Of the Consortium’s 449 public housing units, 265 are located within Waukesha County and the remainder are located within Jefferson County. According to HUD physical inspection scores, these units are split between five locations: two in Waukesha County (Saratoga Heights and scattered sites) and three in Jefferson County (Rock Lake Manor, Johnson Arms & scattered sites, and Rivercrest & scattered sites).

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan.

HUD’s Real Estate Assessment Center (REAC) conducts physical property inspections of properties that are owned, insured, or subsidized by HUD, including public housing and multifamily assisted housing. About 20,000 such inspections are conducted each year to ensure that assisted families have housing that is decent, safe, sanitary, and in good repair. Inspections are scored using a scale of 1 to 100. A passing score for a REAC Physical Inspection is 60 or above.

There are three letters (A-C) that may follow the score, as well as an asterisk *. Their meaning is as follows:

- A: No health and safety deficiencies noted
- B: Non-life-threatening health and safety deficiencies noted
- C: At least one life-threatening health and safety deficiency noted
- *: At least one inoperable smoke detector noted

To determine the physical condition of public housing units within the Consortium, HUD’s Real Estate Assessment Center (REAC) physical inspection scores were examined for this public housing development. The results are listed in the following table.

Public Housing Condition

Table 40. Public Housing Condition

Public Housing Development	Average Inspection Score
Rock Lake Manor	96a
Johnson Arms & Scattered Sites	85c
Rivercrest & Scattered Sites	85c
Scattered Sites (Waukesha)	54c*
Saratoga Heights	96a

Describe the restoration and revitalization needs of public housing units in the jurisdiction.

Three of the five public housing developments in the Consortium received a C designation, indicating at least one life-threatening health or safety deficiency. In addition, the Waukesha scattered sites received a failing score of 54 and had at least one inoperable smoke detector. This indicates a need for revitalization and repair to the development, beginning with the most pressing issue of immediately repairing or replacing any non-functional smoke detectors and addressing any other threats to health and safety.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing.

The Housing Authorities within the Consortium will continue to seek funding from a variety of sources in order to improve conditions in public housing developments.

MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

Introduction

A range of facilities provide housing and services to support people experiencing homelessness in the Waukesha HOME Consortium, including emergency, transitional, safe haven, and permanent supportive housing. However, it can be difficult to assess which available resources are specific to the Consortium, as the Consortium falls under the Wisconsin Balance of State Continuum of Care and data reported through HUD is provided at the Continuum of Care level rather than the individual County level. Using data available from the Continuum of Care and from information gathered from Waukesha, Washington, Jefferson, and Ozaukee Counties, this section provides an estimated overview of shelter facilities, housing, and mainstream and other services that aim to meet the needs of people experiencing homelessness in the jurisdiction.

A range of facilities provide housing and services to support people experiencing homelessness in the Waukesha HOME Consortium, including emergency, transitional, safe haven, and permanent supportive housing. However, it can be difficult to assess which available resources are specific to the Consortium, as the Consortium falls under the Wisconsin Balance of State Continuum of Care and data reported through HUD is provided at the Continuum of Care level rather than the individual County level. Using data available from the Continuum of Care and from information gathered from Waukesha, Washington, Jefferson, and Ozaukee Counties, this section provides an estimated overview of shelter facilities, housing, and mainstream and other services that aim to meet the needs of people experiencing homelessness in the jurisdiction.

Facilities Targeted to Homeless Persons

Table 41. Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher/Seasonal/Overflow Beds		Current & New	Under Development
Households with Adult(s) and Child(ren)	1,132	N/A*	397	242	N/A
Households with Only Adults	776	N/A*	249	651	N/A
Chronically Homeless Households	N/A	N/A	N/A	406	N/A
Veterans	0	0	102	422	N/A
Unaccompanied Youth	7	N/A	4	0	N/A

Source: HUD Housing Inventory Count – Wisconsin Balance of State Continuum of Care, 2023, accessed via https://files.hudexchange.info/reports/published/CoC_HIC_State_WI_2023.pdf

*The Housing Inventory County lists 313 seasonal and 246 overflow/voucher beds, but counts specific to adults and children are not available.

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

There are a variety of mainstream services in use within the Consortium to complement targeted services for homeless persons. The goal is to ensure that there is coordination and collaboration among these systems so that homeless persons are able to easily access mainstream resources that will assist them in transitioning to and remaining stable in permanent housing. Because of the Consortium’s rural nature, collaboration between City, County, and non-profit entities is crucial for ensuring homeless service provision and such collaborations provide the bulk of homeless services within the area.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Agencies that provide services and facilities for homeless individuals and families within the Consortium are listed below along with the service they provide and the target population they serve.

Table 42. Agencies Providing Housing and Services for Homeless Persons

Agency	Services	Target Population
Hope Center	Clothing shop, meals, day center, financial assistance, moving and furniture assistance	All homeless
Food Pantry of Waukesha	Food distribution	All homeless
Salvation Army	Food pantry, community meals, emergency shelter, utility and prescription assistance, disaster relief	All homeless Men
La Casa de Esperanza	Childcare	Women and children
Women’s Center	Emergency housing, transitional housing, childcare, legal advocacy, employment assistance, counseling, crisis hotline	Victims of domestic violence

Community Action Coalition of South Central Wisconsin	Transitional housing assistance, emergency shelter vouchers, rapid rehousing, case management, phone/internet assistance, food distribution	All homeless Chronically homeless Veterans
Hebron House of Hospitality	Emergency shelter, transitional housing, case management, advocacy	Women and children Men
St. Vincent de Paul	Community meals, after release jail ministry, financial assistance	All homeless Persons released from correctional facilities
Housing Action Coalition	Emergency housing, resource center	All homeless
Parent's Place	Prevention, intervention and education services for children who are at risk or have experienced child abuse and neglect	Children
Friend's, Inc.	Emergency shelter, transitional housing assistance, crisis hotline, advocacy, legal services, counseling/support groups	Victims of domestic violence
Family Promise	Emergency shelter, transitional housing, day center, meals	All homeless families

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)

Introduction

This section discusses the characteristics and needs of people in various subpopulation in Waukesha County and the HOME Consortium who may require supportive services, including people with HIV/AIDS, seniors, people with disabilities (mental, physical, or developmental), people with alcohol or drug addiction, and survivors of domestic violence.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, describe their supportive housing needs.

Elderly and Frail Elderly

The elderly and frail elderly often need housing that allows them to age comfortably in place. This may require accessibility modifications that include ground floor entry, wheelchair ramps, and bathtub/shower modifications. The location of supportive housing for elderly populations should consider the site's access to vital resources and health services. Due to limited mobility, seniors may require access to transit or transportation services in order to reach everyday necessities and services. Other supportive service needs for the elderly include healthcare services, independent living support, assistive technologies, and educational assistance.¹⁰ Senior housing should also integrate programming meant to facilitate social interactions and community, as isolation poses a large issue for this population. Stakeholders in our community engagement process noted that more affordable housing is needed in locations that are accessible for seniors in the region.

People with Substance Use Disorders

People with substance use disorders may need services including screening, diagnosis, assessment, and treatment. People recovering from these disorders may need recovery supportive services, including clinical case management, housing and transportation assistance, mental health services, family engagement, behavioral therapy, education, childcare, financial, and health services.¹¹

FOOTNOTES

¹⁰ Centers for Disease Control and Prevention. (n.d.) Disability and health information for people with disabilities. Retrieved from: <https://www.cdc.gov/ncbddd/disabilityandhealth/people.html>

¹¹ Rural Health Information Hub. (n.d.) Treatment and Recovery Support Services. Retrieved from: <https://www.ruralhealthinfo.org/toolkits/substance-abuse/1/support-services>

People Living with HIV/AIDS

Low-barrier housing free from requirements such as those surrounding drug testing, sobriety, criminal background, and medical appointments is a primary need for people living with HIV/AIDS. A 'Housing First' model, in which housing is provided without these kinds of barriers, increases access to housing and reduces the risk of homelessness for people living with HIV/AIDS. Like other special needs populations, people living with HIV/AIDS need housing that provides easy access to health services, resources, and employment. This population may need case management services; however, the Housing First model emphasizes that supportive services should not be required for people living with HIV/AIDS to access housing. In addition to low-barrier housing, people living with HIV/AIDS may need a variety of services, including access to core medical services, as well as supportive services, including childcare services, medical transportation, and non-medical case management, among others.

Public Housing Residents

Public housing residents often need supportive services such as case management and long term follow-up; employment services, including transitional jobs, job-search assistance, sector-based job training, work-related childcare support, and continuing technical and professional education; programs that teach financial literacy; and housing counseling.

Some public housing residents need more intensive case-management and may benefit from integrated supportive housing, in which small numbers of permanent family-supportive housing units are incorporated into mixed-income developments and case management and services are provided on-site. Vouchers with wraparound services provide an alternative model in which case managers support voucher-holders with the same services delivered in permanent supportive housing. Incentives models may also support families in moving toward self-sufficiency by providing rewards for achievements, such as paying rent on time, getting their children to school, applying for a job, and volunteering.

Finally, some public housing residents- particularly those with serious physical and mental health disabilities- may have greater supportive service needs, such as assisted living (meals, housekeeping, health care, case management, grocery store access) and on-site services, including parenting support, childcare, and after-school services for those with children.¹²

Survivors of Domestic Violence

Often, the greatest need for survivors of domestic violence is quick access to safe and affordable housing. Transitional housing options may also provide supportive services such as counseling, childcare, transportation, life skills, education, and job training for up to 24 months,

FOOTNOTES

¹² Theodos, B., Popkin, S. J., Parilla, J., & Getsinger, L. (2012). The challenge of targeting services: a typology of public-housing residents. *Social Service Review*, 86(3), 517-544.

providing survivors time and services to obtain safety and stability.¹³ Difficulties finding affordable housing are common among the general population, but survivors of DV face additional challenges in finding affordable housing that is located near public transit, as well as finding affordable housing that can accommodate families with children.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

People with mental health and substance abuse disorders often require supportive housing following discharge from inpatient treatment to reduce the risk of homelessness. People returning from these institutions need access to affordable housing and health services and may also require supportive services such as case management and transportation assistance. Permanent supportive housing should be affordable, close to needed health services, and accessible to transportation options. A review of the Waukesha County 2022 HOME-ARP Allocation Plan revealed that there is a critical need for the construction of more emergency and transitional shelter units for families with children and more permanent supportive housing units. Supportive services like housing navigators, social workers, and case managers are crucial. They may identify resources and options for those who cannot find immediate housing or provide long-term assistance to promote stability once someone has obtained housing.

The Waukesha County Department of Health and Human Services provides comprehensive mental health services to County residents of all ages. The Waukesha County Mental Health Center provides inpatient services including a 16-bed adult psychiatric hospital for individuals in need of hospital care in order to stabilize symptoms, adjust medication needs, and return safely to the community. Other treatment facilities with inpatient and residential services are available within 25 miles of the HOME Consortium. Rogers Behavioral Health Oconomowoc¹⁴ is 13 miles away from the HOME Consortium Counties and offers 24-hour care, seven days a week in select locations¹⁵.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

According to the 2022 Waukesha County HOME-ARP Allocation Plan, the HOME Consortium will focus on expanding affordable housing options in the region and estimates it will support the production of approximately 50 affordable rental units and 10 non-congregate shelter

FOOTNOTES

¹³ Rogers, L. (2019). Transitional housing programs and empowering survivors of domestic violence. Retrieved from: <https://www.justice.gov/ovw/blog/transitional-housing-programs-and-empowering-survivors-domestic-violence>

¹⁴ *Inpatient Services*. (n.d.). Rogers Behavioral Health. Retrieved from: <https://rogersbh.org/what-we-treat/inpatient-services>

¹⁵ Find Treatment Locator. Retrieved from: <https://findtreatment.gov/locator>

units using HOME-ARP funding. Further, the Consortium will allocate 2025 CDBG and HOME funding toward a variety of housing and supportive services for populations with special needs which includes the following:

- Community Outpatient Services of Menomonee Falls, Inc.: \$8,000
- The Apartment Shelter Program, Family Promise of Waukesha County, Inc: \$8,000
- Home is Waukesha-Supportive Services Offices, Hebron Housing Services: \$175,000
- The C.A.R.E. Center, the Women's Center: \$10,000
- Prescription Medication & Medical Supplies for Medically Underserved, Waukesha Free Clinic, Inc.: \$22,000

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The Consortium will allocate 2025 CDBG and HOME funding toward a variety of housing and supportive services for populations with special needs which includes the following:

- Community Outpatient Services of Menomonee Falls, Inc.: \$8,000
- The Apartment Shelter Program, Family Promise of Waukesha County, Inc: \$8,000
- Home is Waukesha-Supportive Services Offices, Hebron Housing Services: \$175,000
- The C.A.R.E. Center, the Women's Center: \$10,000
- Prescription Medication & Medical Supplies for Medically Underserved, Waukesha Free Clinic, Inc.: \$22,000

The HOME Consortium identified the following housing and special services needs for non-homeless populations in the region:

- Affordable rental housing;
- Emergency and transitional housing (non-congregate shelter) with wraparound services; and
- Supportive services including housing navigation, homelessness prevention, mental health services, case management, and flexible spending pools to respond to individual households' needs.

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)

Describe any negative effects of public policies on affordable housing and residential investment.

The Milwaukee 2020 Regional Analysis of Impediments to Fair Housing Choice (AI) identified the following barriers to fair housing choice:

- Lack of a Regional Housing Strategy or Plan
- Lack of Regionally Dispersed Affordable Housing
- Restrictive Local Land Use Regulations and Other Ordinances
- Restrictive Zoning Regulations for Group Homes and Community Living Facilities
- Prevalent “Fear of Others” existing among residents, including NIMBYism
- Strong Jobs-Housing Transit Mismatch
- Lack of Fair Housing Guidance and Enforcement
- Lack of Accessible Housing for Persons with Disabilities
- Gap in Homeownership by Racial and Ethnic Minorities Compared to White Households
- Overcrowded Housing
- Extensive Use of Evictions
- Racial and Ethnic Disparities in Mortgage Lending, Insurance, and Appraisal Practices
- Lack of Awareness of Fair Housing Laws

The AI also includes a review of the County’s existing zoning code and identifies policies that may limit the development of affordable housing in the region. Although zoning ordinances and land use codes play an important role in regulating the health and safety of the built environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. While the zoning ordinance of the City of Milwaukee and surrounding counties was found to be restrictive, there are opportunities for the region to modify ordinances to further remove barriers to the development of affordable housing across all residential zones.

For example, to encourage more infill development in the traditionally low-density neighborhoods, minimum lot sizes could be further reduced, conversion of established dwellings to multifamily dwellings permitted, and height restrictions relaxed to allow for more density on the same footprint. This would potentially allow for more supply of housing, which helps put downward pressure on rental prices, so that low- and moderate-income families have access to those neighborhoods and all the benefits that come with higher opportunity areas such as access to jobs, better schools, access to transportation, and access to cultural and public amenities.

Survey respondents and community workshop participants noted a particular need for development of affordable rental housing. However, stakeholders also emphasized the need to develop housing for all income levels. Although low-income households have fewer choices in terms of finding suitable housing, households of various income levels are struggling to find housing and thus further limit the options available for lower-income households.

In addition to these public-sector barriers, the private market can also create barriers. As discussed in earlier sections, some landlords may refuse to rent units to households receiving other forms of housing assistance. Known as source of income discrimination, this practice reduces the affordability of existing units in the private housing stock and creates barriers to obtaining affordable housing. The poor quality of some rental housing units also makes them unsuitable for occupancy, thus removing further units for the counties' rental housing inventory.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

This section outlines employment, labor force, and educational attainment data that informs the Consolidated Plan's priorities and goals.

DRAFT

Economic Development Market Analysis

Business Activity

Table 43. Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers	Share of Jobs	Jobs Less Workers
Agriculture, Mining, Oil & Gas Extraction	578	534	0%	0%	0
Arts, Entertainment, Accommodations	17,749	20,591	9%	9%	0
Construction	10,374	17,114	5%	7%	2
Education and Health Care Services	35,625	32,538	19%	14%	-5
Finance, Insurance, and Real Estate	14,343	16,822	8%	7%	-1
Information	4,023	5,293	2%	2%	0
Manufacturing	30,922	43,370	16%	18%	2
Other Services	7,064	8,869	4%	4%	0
Professional, Scientific, Management Services	20,946	25,564	11%	11%	0
Public Administration	0	0	0%	0%	0
Retail Trade	19,743	26,078	10%	11%	1
Transportation and Warehousing	5,535	7,556	3%	3%	0
Wholesale Trade	12,156	17,818	6%	8%	2
Total	179,058	222,147	100%	100%	--
Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)					

Labor Force

Table 44. Labor Force

Total Population in the Civilian Labor Force	199,153
Civilian Employed Population 16 Years and Over	193,180
Unemployment Rate	2.97
Unemployment Rate for Ages 16-24	9.61
Unemployment Rate for Ages 25-65	2.09

Table 45. Occupations by Sector

Occupations by Sector	Number of People
Management, business and financial	62,840
Farming, fisheries and forestry occupations	5,171
Service	14,837
Sales and office	43,543
Construction, extraction, maintenance and repair	11,089
Production, transportation and material moving	8,958
Data Source: 2016-2020 ACS	

Travel Time

Table 46. Travel Time

Travel Time	Number	Percentage
< 30 Minutes	123,176	70%
30-59 Minutes	46,061	26%
60 or More Minutes	6,746	4%
Total	175,983	100%
Data Source: 2016-2020 ACS		

Education

Table 47. Educational Attainment by Employment Status

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	4,298	235	1,757
High school graduate (includes equivalency)	25,710	762	6,860
Some college or associate's degree	44,075	1,436	8,495
Bachelor's degree or higher	81,635	1,476	10,955
<i>Data Source: 2016-2020 ACS</i>			

Table 48. Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	400	397	390	1,200	1,188
9th to 12th grade, no diploma	2,611	847	1,135	2,346	2,468
High school graduate, GED, or alternative	8,650	5,941	5,859	21,585	21,323
Some college, no degree	11,067	7,354	7,935	19,665	15,255
Associate's degree	1,369	3,785	4,059	11,205	4,863
Bachelor's degree	4,102	15,513	16,053	31,425	13,447
Graduate or professional degree	343	5,287	10,162	15,669	8,153
<i>Data Source: 2016-2020 ACS</i>					

Table 49. Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	
High school graduate (includes equivalency)	
Some college or associate's degree	
Bachelor's degree	
Graduate or professional degree	
Data Source: 2016-2020 ACS	

Based on the business activity table above, what are the major employment sectors within your jurisdiction?

The employment sectors in Waukesha County with the largest numbers of jobs are manufacturing (42,227 jobs or 18.0%); retail trade (24,034 jobs or 10.3%); and construction (17,253 jobs or 7.4%), (See Table 44).

The jobs in which the most county residents are employed do not reflect these major employment sectors, aside from the manufacturing industry. The largest shares of residents are employed in education and health care services (51,127 workers or 23.5%); manufacturing (38,090 workers or 17.5%); and professional, scientific, and management services (25,264 workers or 11.6%).

The largest mismatches between the share of workers (i.e., employed residents) and the share of jobs by sector are in education and health care services, which accounts for 23.5% of workers but only 4.8% of jobs in the county. This indicates that the jobs in this sector may be outside of the county limits. The difference between the share of workers and share of jobs within this sector is -18.7 percentage points.

Describe the workforce and infrastructure needs of the business community.

The 2009 Comprehensive Development Plan for Waukesha County¹⁶ identified the following economic development needs and opportunities:

- Aging workforce
- Lack of population diversity

FOOTNOTES
¹⁶ 2009 Waukesha County Comprehensive Development Plan, Economic Development. Retrieved from: <https://www.waukeshacounty.gov/globalassets/parks--land-use/planning-zoning/chapter-6-economic-development-print-ready.pdf>

- Need to continue to increase the number of people with college and technical degrees
- Need for additional technology development. There is a resistance/conservatism among area businesses for investing in new technology and businesses processes in the face of global competition.
- Cyclical over-development of office space within the county
- Labor force issues inhibit the success of existing businesses and the attraction of new business; quantity and quality of workers, and assimilation of ethnic/minority workers.
- Ineffective resource allocation across educational units hinders workforce preparedness in key areas
- Insufficient resources are available to create a supportive environment for “new economy” businesses (finance, information, collaborative networks).
- The County does not have a strong image for attracting business, entrepreneurs, young workers, and visitors.
- The region is losing corporate headquarters with high paying jobs.
- Excessive governmental regulations limit the growth of certain industries.

The 2021-2025 Southeastern Wisconsin Regional Planning Commission’s CEDS¹⁷ also outlines workforce development and infrastructure weaknesses and threats in the region, including:

- Racial disparities in areas such as employment, income, educational attainment, transportation options, affordable housing options, and affordable access to broadband internet
- Educational attainment, while relatively high overall, remains highly variable throughout the Region
- Lack of political will or support to invest in a regional transportation system
- Inability to attract and retain skilled workers
- Higher taxes, and limited economic incentives, compared with many U.S. regions
- Disproportionate impact of COVID-19 on the workforce, particularly on women, people of color, and low-income populations
- Talent shortage and misaligned workforce without the skills to meet the needs of employers, especially in the manufacturing sector
- Brain drain of local college graduates
- Negative impacts of climate change on the economy and people
- Excessive partisanship/division statewide

Community stakeholders also noted the need for workforce training and job search assistance for low- and- moderate income households. Some stakeholders commented that while training and adult education opportunities may be available in Waukesha County and the HOME Consortium, people often have difficulty accessing them due to transportation limitations or lack of childcare. They also indicated the importance of attracting developers into the region

FOOTNOTES

¹⁷ 2021-2025 Southeastern Wisconsin Comprehensive Economic Development Strategy. Retrieved from: <https://www.sewrpc.org/SEWRPCFiles/CommunityAssistance/EconDev/CEDSReport-Sept2021.PDF>

and expanding mixed-use development models to promote economic development while also focusing on increasing the housing supply.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The CEDS described the Southeastern region of Wisconsin to have the advantage of being in close proximity to both agricultural and industrial areas of the state, in addition to having access to a major international transportation network. However, the CEDS also noted that the landscape has changed dramatically for existing employers and workers alike since the COVID-19 pandemic. The CEDS highlighted critical threats to the region's decline include an aging population and workforce. While the region's population has grown overall, its growth has been slow. Further, the region is struggling to retain college graduates and also has a lack of talent and misaligned workforce to meet the needs of employers, particularly in manufacturing. The state is primarily affected by excessive partisanship and division which has resulted in declining state and public funding for education and services and county and municipal budget deficits. The negative impacts of climate change and people was further noted as another impending threat to the region's economy.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

According to the CEDS, the region is the leading manufacturing region in the U.S. including a high concentration of manufacturing employees across various skill levels. The region also holds a competitive advantage in industry clusters such as energy, power, water technology, food and beverage manufacturing, health services, electronics manufacturing, and several others. Particularly, Waukesha County and the City of Milwaukee contain the largest job concentrations in the region and state, with the Southeastern region accounting for more than one-third of the state's jobs. The CEDS forecasts that by the year 2050 the region's employment is projected to increase by 9%, from 1.3 million jobs to 1.4 million. Waukesha County is projected to increase by 8%, or an additional 23,900 jobs.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Milwaukee Area Technical College's Workforce Solutions Program assists with the professional development needs of organizations. Their services include customized training programs that have resulted in increased employee productivity, reduced costs, and increased revenue for companies. Training opportunities include industry specific training, program and curriculum development, and certifications¹⁸.

Several organizations like the African American Leadership Alliance Milwaukee (AALAM), the Hispanic Collaborative, and the Ethnic & Diverse Business Coalition (EDBC) help people of color to overcome barriers to succeeding in the region's economy.

The Metropolitan Milwaukee Associate of Commerce (MMAC) currently launched the Region of Choice Initiative which aims to improve the recruitment, retention, and advancement of Black and Brown talent in the region by helping make workplaces more inclusive and collectively increasing the number of African American and Hispanic/Latino employees¹⁹.

Gateway Technical College's Business and Workforce Solutions program focuses on enhancing proficiency and expanding workforce skills through specific training in a variety of fields such as technology, leadership and project management, design and fabrication, manufacturing and construction, trades, and more²⁰.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)? If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Yes. The Southeastern Wisconsin Regional Planning Commission is charged with the responsibility of preparing a Comprehensive Economic Development Strategy (CEDS) every five years for the seven counties in the Southeastern Wisconsin Region, which includes: Kenosha, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha Counties. The 2021-2025 CEDS was the most recent report.

FOOTNOTES

¹⁸ Milwaukee Area Technical College. MATC Workforce Solutions. Retrieved from: <https://www.matc.edu/employer-services-resources/workforce-solutions/index.html>

¹⁹ Metropolitan Milwaukee Association of Commerce. Region of Choice Initiative. Retrieved from: <https://www.mmac.org/rocpathway1.html>

²⁰ Gateway Technical College. Business and Workforce Solutions. Retrieved from: <https://www.gtc.edu/business-community/business-workforce-training/business-and-workforce-solutions>

MA-60 Broadband Needs of Housing Occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Broadband connectivity is a vital community resource that offers citizens access to employment, education, and other personal enrichment opportunities found through the internet. Disparities in broadband access – particularly for low-to-moderate households – can create a “digital divide” that limits users’ personal and professional opportunities. In 2015, the FCC defined broadband as internet access with download speeds of 25 Megabits per second (Mbps) and upload speeds of 3 Mbps (otherwise noted as 25/3). With broadband access, internet users can partake in file downloading, video streaming, email, and other critical features necessary for online communication.

There are three considerations to be taken into account in assessing internet access: (1) need for broadband wiring and for connections to broadband service; (2) competitive pricing and service resulting from having more than one internet service provider within an area; and (3) affordability of broadband service for low- and moderate-income households. For households without access to the internet, libraries throughout the four-county region generally offer free access to computers and Wi-Fi. Several also offer a program allowing patrons to borrow wireless hotspots for in-home use to connect up to ten devices to unlimited data. Hotspots are typically available for a week with options to renew for additional weeks. Housing and service providers serving low- and moderate-income populations and people who are homeless may also provide internet access. For example, some affordable housing properties have business centers, some shelters or day centers have computers for visitor use, and local job centers may provide computers for use in job searches. Additionally, the Community Action Coalition of South Central Wisconsin provides telecommunication assistance, allowing clients to pay overdue phone or internet bills in order to avoid service shutoffs.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Marginalized and/or minority households are generally disproportionately represented among low-to-moderate income households and therefore may be disproportionately impacted by a lack of internet access. The website BroadbandNow, which exists to help people discover internet options in their area, conducts research into broadband availability and user demographics by state and provides data on Wisconsin households without internet access. This data shows that 35% of extremely low-income households and 16% of low-to-moderate

income households in Wisconsin are without internet, and that Black residents are more than twice as likely as white residents to be without internet access:

Table 50. Demographics of Wisconsin Households without Internet

Percent of Homes without Internet Access by Age	
Under Age 18	4%
Age 18-64	5%
Age 65+	7%
Percent of Homes without Internet Access by Income	
Under \$20,000	35%
\$20,000-\$74,999	16%
Over \$75,000	4%
Percent of Homes without Internet Access by Race/Ethnicity	
Hispanic	7%
Black	10%
White	4%
Native American or Alaskan	7%
Mixed Race	5%
Asian	7%

Source: BroadbandNow Wisconsin - <https://broadbandnow.com/Wisconsin>

BroadbandNow also reports by County the percentage of residents who have access to internet connection with speeds of at least 25 Mbps. According to this data, residents of Jefferson County have the lowest levels of access with 85.9% having access, while residents of Waukesha, Washington, and Ozaukee counties have access rates of 95.5-99.4%. Waukesha and Jefferson County are also certified as Broadband Forward communities by the Public Services Commission of Wisconsin.

Just because a person has broadband available in their area does not mean that they have access, however – according to the 2018-2022 American Community Survey, 11.6% of Jefferson County residents, 7.7% of Ozaukee County residents, 8.7% of Washington County residents, and 7.1% of Waukesha County residents do not have an internet subscription service of any type, including a cellular data plan. This may indicate that internet access in the Consortium is unaffordable for low-income residents, which may in turn indicate a need for increased competition for affordable internet access programs.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

All four counties in the HOME Consortium have developed a hazard mitigation and emergency plan. The plans address the following hazards associated with climate change:

- Drought & Dust Storms
- Earthquakes
- Flooding & Dam Failure
- Fog
- Forest & Wildfires
- Hail
- Lightning
- Thunderstorms
- Tornadoes & High Winds
- Winter Storms

The 2021 Waukesha County All Hazard Mitigation Plan identifies and assesses the potential and current impact of natural hazards. The following hazards pose the highest risk of vulnerability to the community and infrastructure in Waukesha County: flooding and dam failure, hail, lightning, thunderstorms, and high winds. Historically, flooding has most significantly impacted communities such as the villages of Elm Grove and Pewaukee; the cities of Brookfield, New Berlin, Muskego, and Waukesha; and the unincorporated portions of Waukesha County. The urban areas of the County also have the highest risks associated with tornadoes and severe winds, including the larger cities of Waukesha, New Berlin, Brookfield, Muskego, Oconomowoc, Pewaukee, and the Village of Menomonee Falls.

The 2018 Washington County Hazard Mitigation Plan identified the natural hazards that currently have high occurrence in the county include flooding and stormwater drainage problems. The Plan emphasized the frequency and magnitude of heavy precipitation events have been increasing throughout the State of Wisconsin. The County itself experienced an increase in average precipitation between 1950 and 2006. Additionally, most climate models project an increase in average annual precipitation in Southeastern Wisconsin to continue to increase, including intense rainfall events. This poses a high risk for the County as heavier rainfall events overwhelm stormwater infrastructure that can result in flooding and other cascading effects.

The 2020-2025 Ozaukee County Hazard Mitigation Plan identified the hazards with the highest risk of occurrence include flooding as well as thunderstorm, high winds, hail, and lightning. Similarly, the Jefferson County 2019-2023 Hazard Mitigation Plan found the highest ranked natural hazards affecting the County include riverine flooding, tornadoes, and thunderstorms.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

In its September 2021 report “Climate Change and Social Vulnerability in the United States²¹,” the US EPA identifies low-income earners, minorities, elderly adults, and persons with less than a high school diploma as ‘socially vulnerable.’ Socially vulnerable persons are described as having a reduced capacity to cope with and recover from climate change impacts, and socially vulnerable groups are described as more likely to live in poorer neighborhoods with lower elevations and poorly maintained infrastructure. As of the 2018-2022 American Community Survey 5-Year estimates, Jefferson County has the highest poverty rate in the HOME Consortium with a rate of 7.6% of its population living below the poverty level. Waukesha County holds the second highest poverty rate, with a rate of 4.9%, followed by Washington County (4.7%) and Ozaukee County (4.5%). The poverty rates in the HOME Consortium are lower than the overall poverty rate in the state of Wisconsin which is currently estimated at 10.7%.

Mobile home residents may be especially vulnerable to climate related hazards. According to the 2018-2022 American Community Survey 5-year estimates, Jefferson County contains the most mobile homes in the HOME Consortium with an estimated 1,277 occupied units. Waukesha County holds the second highest number of occupied mobile homes (891), followed by Washington County (660) and Ozaukee County (105).

FOOTNOTES

²¹ U.S. EPA. (September 2021) “Climate Change and Social Vulnerability in the United States.” https://www.epa.gov/system/files/documents/2021-09/climate-vulnerability_september-2021_508.pdf

STRATEGIC PLAN

SP-05 Overview

Strategic Plan Overview

The Strategic Plan will guide the allocation of Community Development Block Grant and HOME funding during the 2025-2029 planning period. The County and HOME Consortium's goals for that period focus on a number of high priority needs identified through data analysis, community member input, consultation with government and public and private sector agencies, and reviews of relevant recently completed plans and studies.

This Plan outlines resources expected to be available to meet community needs, priorities for using these resources, target geographies for the use of funds, and goals for achievement through 2029. It reviews topics such as housing market conditions, homelessness, public housing, lead-based paint, and anti-poverty initiatives to ensure that housing and community development activities are coordinated with and build on other strategies for the County and region.

The County and HOME Consortium will focus their priorities on projects and programs that meet CDBG and HOME eligibility requirements, have long term impacts on low- and moderate-income residents, and help address other federal, state, and local priorities, such as fair housing choice and sustainability. Projects selected for funding during the five-year period will be managed as efficiently as possible in order to address a range of issues in Waukesha County and the HOME Consortium region.

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 51. Geographic Priority Areas

1	Area name	Prairieville NRSA
	Area type	Strategy Area
	HUD approval date	TBD
	Revitalization type	Comprehensive
	Identify the neighborhood boundaries for this target area	The Prairieville NRSA includes 17 census blocks in and around downtown Waukesha (see map below). Beginning at the intersection of Delafield Street and W. Moreland Boulevard, boundary streets include W. Moreland Boulevard to the Fox River, Oscar Street to Highland Avenue, W. Moreland Boulevard to US Hwy 18, Arcadian Avenue to N. Hartwell Avenue, E. College Avenue to S. East Avenue, W. Wabash Avenue to S. West Avenue, W. College Avenue to the Fox River Sanctuary, S. Moreland Boulevard to Madison Street, N. Grandview Boulevard to Summit Avenue, N. Hine Avenue to Magnolia Dr, and back to the original intersection at Delafield Street and W. Moreland Boulevard.
	Include specific housing and commercial characteristics of this target area	The Prairieville NRA includes 2,264 acres of land, including about 1,437 acres of land developed for commercial, government, institutional, industrial, and residential uses. Residential uses comprise about 61% of developed land in the NRSA, followed by government and institutional uses (14%), commercial uses (13%), and industrial uses (12%). As of 2024, the Prairieville NRSA was home to an estimated 8,431 households, including 40% homeowners and 60% renters. The homeownership rate within the NRSA is lower than that of both the City of Waukesha and Waukesha County.

How did your consultation and citizen participation process help you to identify this neighborhood as a target area?

Residential data such as code violations and building permit activity indicate a need for investment in existing housing within the Prairieville NRSA. These datasets show evidence of distress in the community related to property deterioration, delayed maintenance, and potential health and safety risks. While the Prairieville NRSA contains about 30% of the City of Waukesha's housing, about one-half (50%) of code violations within the city occurred in the NRSA. The NRSA also shows signs of lower permitting activity (only 17% of citywide permits), despite including a concentration of older homes with greater maintenance and repair needs.

In 2024, Waukesha County worked with UW-Extension of Waukesha County to collect stakeholder input regarding the Prairieville NRSA. Waukesha County previously had identified three separate NRSAs, and community input informed the process through which those NRSA boundaries were combined and expanded to form the Prairieville NRSA. Residents, organizations and community and city leaders were surveyed and interviewed. A survey instrument was developed and shared with community partners, organizations, and residents in the area. Additionally, resident-based groups were engaged for feedback regarding NRSA boundary updates. Participants generally preferred the expanded Prairieville NRSA boundary to the previous three NRSAs. Numerous comments also focused on undeveloped land and potential redevelopment sites to address housing challenges within the Prairieville NRSA.

Identify the needs in this target area

Goals for addressing needs within the Prairieville NRSA include:

1. Address housing challenges by strengthening residential property investment with rehabilitation, new development, and in-fill development.
 - Support and expand efforts for exterior home improvements.
 - Maintain and improve housing stock through home repair programs.
 - Increase community efforts to expand programs that preserve, build, and rehab housing units.
 - Promote opportunities to increase homeownership for those employed in the NRSA.
 - Hold an annual housing resource to share resources with NRSA residents.
 - Initiate conversations with landlords, elected officials, and other stakeholders to address concerns around rental property conditions and nuisances.
 - Explore opportunities for land acquisition for new housing development.
 - Engage community stakeholders and brokers to encourage housing development on undeveloped parcels.

What are the opportunities for improvement in this target area?

2. Support neighborhood empowerment initiatives for positive impact with quality of life.
 - Strengthen neighborhood partnerships to improve public services and safety.
 - Develop an ad-hoc community team to study and identify opportunities to improve walkability, bicycle friendliness, and public safety in the NRSA.
 - Develop opportunities for potential public/private partnerships 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 lifelong wellness.
 - Create neighborhood opportunities for residents to strengthen relationships, address shared issues, and conduct resident-led beautification projects.
3. Foster a NRSA-based approach to focus on economic empowerment through resident skill development and support for locally-owned enterprises.
 - Support development of a group to provide non-profit Community-Based Development Organization leadership to implement NRSA strategies.
 - Strengthen capacity with the Redevelopment Authority to address opportunities in the NRSAs, increasing its ability to develop a more robust Common Council and collaborate with the Community Development Department.
 - Increase support for business development.
 - Increase economic empowerment opportunities with job training, job development, and education leading to higher paying jobs.
 - Connect NRSA residents with “closer to home” job opportunities.
 - Build out the entrepreneurial ecosystem to support sustainable microenterprise.

Specific strategies for improvement are outlined above. Overall, the Prairieville NRSA 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 safe, 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

	Are there barriers to improvement in this target area?	Limited funding is a barrier to improvement within the Prairieville NRSA. Funding will primarily come from CDBG allocations, with potential for layering HOME funds, local TIF resources, and partnerships with non-profit housing developers. Waukesha County will also seek to leverage local and statewide resources including: City of Waukesha grants and loans; business assistance loans for façade improvements, awnings, or signage; housing rehabilitation programs offered through the City of Waukesha, Habitat for Humanity of Waukesha County, and the HOME Consortium; other HOME Consortium housing programs related to homeownership and housing development; Wisconsin Housing and Economic Development Authority (WHEDA) affordable housing and business financing programs; programs offered through the Waukesha County Workforce Development Center; and others.
2	Area name	Countywide
	Area type	Other
	HUD approval date	Not Applicable
	Revitalization type	Other
	Identify the neighborhood boundaries for this target area	Waukesha County boundaries
	Include specific housing and commercial characteristics of this target area	<p>Housing in Waukesha County is predominately single-family detached (67% of units) and owner occupied (74% of occupied units). About 19% of units are in multifamily structures (5+ units per structure). The large majority of owner-occupied units have 3 or more bedrooms (86%), while most rental housing has 1 or 2 bedrooms (78%). Median home value is \$293,500 and median rent is \$951. About 18% of owner-occupied units and 44% of renter-occupied units have one or more housing conditions (cost burden, overcrowding, lack of complete kitchens, or lack of complete plumbing). The majority of housing conditions were related to cost/affordability.</p> <p>Employment sectors in Waukesha County with the largest number of jobs are manufacturing (43,370 jobs or 18%), education and health care services (32,538 jobs or 14%), retail trade (26,078 jobs or 11%), and professional scientific, and management services (25,564 jobs or 11%).</p>

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The Waukesha County area was identified as a target area for CDBG activities eligible to occur throughout the County, including housing assistance, public services, economic development, planning and administration, and public facilities and infrastructure, provided that they serve eligible populations or are within a low- and moderate-income census block group. Needs were identified through consultation and citizen participation, which included about 80 people who attended a meeting or focus group, completed a survey, or participated in an interview.
	Identify the needs in this target area	Priority needs include homeownership and housing rehabilitation, affordable rental housing, public services, homeless housing and services, non-homeless special needs housing and services, facility and infrastructure improvements, economic development, and fair housing.
	What are the opportunities for improvement in this target area?	Investment opportunities countywide include the use of CDBG funds for direct financial assistance to homebuyers, homeowner housing rehabilitation, provision of public services including for people who are homeless and other special needs populations, public facility and infrastructure improvements, and assistance to businesses.
	Are there barriers to improvement in this target area?	Obstacles to improvements include a limited availability of public and private funds to address needs that exist throughout the county.
3	Area name	HOME Consortium
	Area type	Other
	HUD approval date	Not Applicable
	Revitalization type	Other
	Identify the neighborhood boundaries for this target area	The four-county HOME Consortium area includes Waukesha, Jefferson, Ozaukee, and Washington Counties.

Include specific housing and commercial characteristics of this target area

Housing in the HOME Consortium is predominately single-family detached (67% of units) and owner occupied (74% of occupied units). About 18% of units are in multifamily structures (5+ units per structure). The large majority of owner-occupied units have 3 or more bedrooms (85%), while most rental housing has 1 or 2 bedrooms (73%). About 18% of owner-occupied units and 42% of renter-occupied units have one or more housing conditions (cost burden, overcrowding, lack of complete kitchens, or lack of complete plumbing). The majority of housing conditions were related to cost/affordability.

How did your consultation and citizen participation process help you to identify this neighborhood as a target area?

The HOME Consortium area was identified as a target area for HOME activities eligible to occur throughout the four-county area, including affordable rental housing rehabilitation and construction, affordable homeownership housing construction, downpayment assistance, homeowner housing rehabilitation and purchase rehab, and other eligible housing activities. Needs were identified through consultation and citizen participation, which included about 80 people who attended a meeting or focus group, completed a survey, or participated in an interview.

Identify the needs in this target area

Priority needs in the HOME Consortium include affordable rental housing, housing rehabilitation, and homeownership assistance.

What are the opportunities for improvement in this target area?

Investment opportunities in the HOME Consortium include the use of HOME funds for affordable rental housing construction and rehabilitation, affordable homeownership housing construction, downpayment assistance, and homeowner housing rehabilitation/purchase rehab.

Are there barriers to improvement in this target area?

Obstacles to improvements include a limited availability of public and private funds to address needs that exist throughout the HOME Consortium.

SP-30 Influence of Market Conditions - 91.415, 91.215(b)

Influence of Market Conditions

Table 52. Influence of Market Conditions

Affordable Housing Type	Market Characteristics that Will Influence the Use of Funds Available for Housing Type
Tenant Based Rental Assistance (TBRA)	High level of cost burdens among low-income households; waiting lists for assisted housing units; and need for short-term rental assistance for homeless individuals and families transitioning to permanent housing. Currently, local housing authorities provided assistance through HUD's Section 8 Housing Choice Voucher program. According to the Waukesha Housing Authority, 1,050 families are currently receiving rental assistance through the voucher program (for more information, see Section NA-35). Additionally, the HOME Consortium supports a TBRA program (separate from HUD Section 8 Housing Choice Vouchers) using HOME grant funds.
TBRA for Non-Homeless Special Needs	High level of cost burdens among low-income households, including non-homeless special needs populations; waiting lists for assisted housing units for seniors and people with disabilities. Low vacancy rates, limited number of landlords who accept vouchers, and limited availability of accessible units suggest support for new affordable housing construction instead of TBRA. The HOME Consortium has an estimated \$300,000 of funds set aside for TBRA (separate from HUD Section 8 Housing Choice Vouchers) over the next program year.
New Unit Production	Age and condition of housing; waiting lists at existing assisted housing developments; high occupancy rates and rental rates; sales prices unaffordable to low/moderate income households. The HOME Consortium intends to use \$186,813 of funding to encourage new housing development over the next five years.
Rehabilitation	Age and condition of housing; issues related to substandard housing, especially for low-income renters; need for home repairs for seniors and other homeowners, including lead-based paint remediation. The HOME Consortium intends to use \$225,000 CDBG funds to assist low-income homeowners with housing rehabilitation.
Acquisition, including Preservation	Subsidized housing developments anticipated to age out of their affordability period; age, condition, and availability of multifamily properties suitable for acquisition/rehabilitation; vacant/hazardous buildings identified through code enforcement. The HOME Consortium intends to use CDBG funds for acquisition and/or clearance and demolition of vacant, hazardous lots or buildings. Properties may subsequently be sold or rented to low/moderate income households to create affordable housing opportunities.

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

Waukesha County receives a direct Community Development Block Grant (CDBG) allocation from HUD and is the lead agency for the HOME Consortium, through which Waukesha, Jefferson, Ozaukee, and Washington Counties collaborate to receive a direct HOME Investment Partnerships (HOME) allocation from HUD. The table below shows allocations for the 2025 program year, along with anticipated grant funding for the remaining four years covered by this Consolidated Plan. These estimates assume that funding over those four years will average to be about the same as the 2025 allocation.

Additionally, during the 2025 program year, the Waukesha County anticipates receiving about \$60,000 in CDBG program income and the HOME Consortium anticipates receiving about \$200,000 in HOME program income.

Residents of Waukesha County and the HOME Consortium are also eligible for housing assistance through HUD’s Section 8 Housing Choice Voucher and Public Housing programs administered by local housing authorities and Continuum of Care programs operated by local agencies and funded through the Wisconsin’s Balance of State Continuum of Care.

NOTE: HUD has not announced 2025 CDBG and HOME allocations. Announcements will be made following the passing of the federal budget.

Anticipated Resources

Table 53. Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Federal	Acquisition Admin and planning Economic development Housing Public improvements Public services	\$1,471,411	\$60,000	\$0	\$1,531,411	\$5,885,644	Waukesha County's 2025 CDBG allocation reflects a 0% change from 2024 funding levels.
HOME	Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for homeownership TBRA	\$1,342,416	\$200,000	\$0	\$1,542,416	\$5,369,664	The HOME Consortium's 2025 HOME allocation reflects a 0% change from 2024 funding levels.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

While CDBG funds do not require a match, Waukesha County anticipates leveraging other public and private investment for a higher return on investment. The County rarely fully funds any program or project, instead requiring leverage ranging from 1:1 in public service dollars, 3:1 in economic development loans, to 10:1 or larger for housing development. CDBG and HOME program income funds generated during this Action Plan will be leveraged to increase services to low- and moderate-income residents within Waukesha County and the HOME Consortium region.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

Waukesha County and the HOME Consortium do not intend to use publicly owned land or property to address the needs identified in this Plan.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Table 54. Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Waukesha County	Government	Housing – Ownership Housing – Rental Homelessness Non-Homeless Special Needs Public Facilities Neighborhood Improvements Public Facilities Public Services Economic Development Planning	Jurisdiction / HOME Consortium
City of Waukesha	Government	Housing – Ownership Housing – Rental Public Facilities Neighborhood Improvements Public Services Economic Development	Jurisdiction
Waukesha Housing Authority	PHA	Public Housing Public Services	Jurisdiction
Housing Action Coalition of Waukesha County	Continuum of Care	Homelessness Public Services	Jurisdiction
Metropolitan Milwaukee Fair Housing Council	Other – Fair Housing Agency	Public Services Planning	Region

Assess of Strengths and Gaps in the Institutional Delivery System

Waukesha County staff work with CDBG and HOME Consortium Boards of Directors to administer the CDBG program for Waukesha County and the HOME program for the four-county HOME Consortium. For the Consortium, representatives from throughout the four-county area sit on the HOME Board. For both programs, grant funding is allocated using a Request for Proposal (RFP) process, through which potential subrecipients, including local agencies, housing developers, municipalities, County departments, and others submit funding applications for evaluation and decision by the Boards. The HOME Consortium also funds a set of core programs – homeowner housing rehabilitation, housing purchase/rehabilitation, and down payment assistance – each year. County staff manage the application process and subsequent sub-grantee agreements, program administration, and monitoring. A strength of this process is that it allows collaboration with and funding to a variety of non-profit and social service agencies to meet a myriad of needs that exist within the community. Additionally, agencies have the benefit of learning about the CDBG and HOME programs, related requirements, and available funding from County staff during the application process and throughout the year.

While local and regional agencies, developers, municipalities, and others work with the County to deliver a variety of housing, public service, and community improvement activities to residents, gaps in the institutional delivery system identified during the Consolidated Planning process include:

- Limited number of local agencies that qualify as Community Based Development Organizations (CBDOs) and, as such, are eligible to apply to conduct public service activities in Waukesha County’s Neighborhood Revitalization Strategy Areas (NRSAs).
- Lack of knowledge within potentially eligible non-profits about eligibility or the funding application process
- Lack of public knowledge and advertisement about the Consolidated Planning process and its implications on funding decisions – several representatives of local organizations noted disappointment in missing community meetings due to a lack of notice

Availability of Services Targeted to Homeless Persons and Persons with HIV and Mainstream Services

Table 55. Homeless Prevention Services Summary

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services		X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth).

The Housing Action Coalition of Waukesha County is comprised of more than 20 local agencies working to prevent and respond to homelessness in Waukesha County through provision of housing and services, including for chronically homeless individuals, families with children, veterans and their families, and unaccompanied youth. Using CDBG funding, Waukesha County provides support to several housing and service providers dedicated to serving people experiencing homelessness. During the 2025 program year, these include:

- The Hope Center – funding programs including a free clothing shop, outreach meals, a day center for people who are homeless and others, transportation assistance,

healthcare access assistance, and assistance moving from a shelter to a family residence.

- The Women's Center – serves women, children, and men impacted by domestic abuse, sexual violence, child abuse, and trafficking with emergency shelter, transitional housing, counseling support, childcare, legal advocacy, and employment counseling. The Women's Center also provides community education about violence prevention.
- Hebron Housing Services – funding the supportive service office, which provides housing, services, and case management for men, women, children, and families, including people who are chronically homeless; and additionally funding emergency shelter operations.
- The Salvation Army – funding the emergency shelter and food insecurity programs.
- Family Promise of Waukesha County – for the provision of emergency shelter.
- The Waukesha Housing Action Coalition – funding for emergency winter overflow shelter.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above.

Waukesha County works the Housing Action Coalition and other community partners to collaborate on projects that provide services to people experiencing homelessness and other special needs populations. The County's designation of Neighborhood Strategy Revitalization Areas (NRSAs) allow it flexibility in addressing economic development, housing, and public services, including allowing additional public service funding for organizations that serve homeless and other special needs populations within the County's NRSAs.

While there are many organizations in Waukesha County serving people who are homeless and other special needs populations, service delivery gaps exist due to limited funding and a lack of sufficient permanent affordable housing or Section 8 vouchers. Without a sufficient affordable supply, housing navigators and case managers have difficulty connecting clients to long-term housing. Additional barriers to housing access may include past evictions, past convictions, high security deposits, or, for larger families, inability to find suitably-sized units. Additional resources are also needed to provide services, including free or low-cost healthcare, childcare, or transportation.

Another gap or barrier may be in a lack of communication between and within service provision organizations – some staff members of such organization noted disappointment in a lack of knowledge of the Consolidated Planning process and opportunities to provide

feedback. Additionally, some staff members mentioned that the funding application process may be confusing or difficult, indicating a need for further education in this area.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs.

Over the next five years, Waukesha County staff will continue outreach efforts to strengthen collaboration and expand understanding of the CDBG and HOME programs among community organizations, service providers, and housing developers. County staff will also work with the University of Wisconsin Extension program to identify potential new Community Based Development Organizations (CBDOs) and support existing CBDOs eligible to receive NRSA funding through the CDBG program. The County will also continue exploring potential partner organizations for TBRA administration and case management.

The County is currently an active member of the Housing Action Coalition and County staff will continue their participation with the HAC over the next five years, working to identify ways CDBG or other potential funding may be used to address service gaps for people who are homeless or have other special needs.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Table 56. Goals Summary (NOTE: Final funding amounts TBD based on HUD grant allocations.)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Maintain and Expand Housing Affordability	2025	2029	Affordable Housing	Countywide HOME Consortium	Homeownership Assistance and Housing Rehabilitation; Affordable Rental Housing	Est. 25% of CDBG funding Est. 90% of HOME funding	Direct financial assistance to homebuyers Homeowner housing units rehabilitated Rental units constructed Rental units rehabilitated Homeownership housing added Tenant-based rental assistance
2	Provide Public Services	2025	2029	Non-Housing Community Development Homeless Non-Homeless Special Needs	Countywide	Public Services; Homeless Housing and Services; Non-Homeless Special Needs	Est. 15% of CDBG funding	Public service activity other than low/moderate income housing benefit

						Housing and Services		Homeless overnight shelter
3	Improve and Maintain NRSAs	2025	2029	Non-Housing Community Development	Prairieville NRSA	NRSA Revitalization	Est. 10% of CDBG funding	Public service activity other than low/moderate income housing benefit Other
4	Improve Public Facilities and Infrastructure	2025	2029	Non-Housing Community Development	Countywide	Facility and Infrastructure Improvements	Est. 25% of CDBG funding	Public facility or infrastructure improvement other than low/moderate income housing benefit
5	Economic Development	2025	2029	Non-Housing Community Development	Countywide	Economic Development	Est. 5% of CDBG funding	Façade treatment/ business building rehab Business assistance
6	Administration and Planning	2025	2029	Administration and Planning	Countywide HOME Consortium	Administration and Planning Fair Housing	Est. 20% of CDBG funding Est. 10% of HOME funding	Other

SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

No housing authorities within the Consortium are under a Section 504 voluntary compliance agreement. HUD requires that for all affordable housing developments, a total of 5% of all units must be accessible to persons with disabilities. Public housing provided within the Consortium meets accessibility requirements but currently has a wait time of around 2.5 years according to APSH data.

Activities to Increase Resident Involvements

The housing authorities within the Consortium offer a variety of services to increase resident involvement, including collaborating with local non-profit service providers to engage residents in self-sufficiency activities such as job training.

Is the public housing agency designated as troubled under 24 CFR part 902?

None of the PHAs in Waukesha County or the HOME Consortium are designated as troubled.

Plan to Remove the 'Troubled' Designation

Not applicable.

SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)

Barriers to Affordable Housing

The Milwaukee 2020 Regional Analysis of Impediments to Fair Housing Choice (AI) identified the following barriers to fair housing choice:

- Lack of a Regional Housing Strategy or Plan
- Lack of Regionally Dispersed Affordable Housing
- Restrictive Local Land Use Regulations and Other Ordinances
- Restrictive Zoning Regulations for Group Homes and Community Living Facilities
- Prevalent “Fear of Others” existing among residents, including NIMBYism
- Strong Jobs-Housing Transit Mismatch
- Lack of Fair Housing Guidance and Enforcement
- Lack of Accessible Housing for Persons with Disabilities
- Gap in Homeownership by Racial and Ethnic Minorities Compared to White Households
- Overcrowded Housing
- Extensive Use of Evictions
- Racial and Ethnic Disparities in Mortgage Lending, Insurance, and Appraisal Practices
- Lack of Awareness of Fair Housing Laws

Survey respondents and community workshop participants noted a particular need for development of affordable rental housing. However, stakeholders also emphasized the need to develop housing for all income levels. Although low-income households have fewer choices in terms of finding suitable housing, households of various income levels are struggling to find housing and thus further limit the options available for lower-income households.

In addition to these public-sector barriers, the private market can also create barriers. As discussed in earlier sections, some landlords may refuse to rent units to households receiving other forms of housing assistance. Known as source of income discrimination, this practice reduces the affordability of existing units in the private housing stock and creates barriers to obtaining affordable housing. The poor quality of some rental housing units also makes them unsuitable for occupancy, thus removing further units for the counties’ rental housing inventory.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The AI also includes a review of the County’s existing zoning code and identifies policies that may limit the development of affordable housing in the region. Although zoning ordinances and land use codes play an important role in regulating the health and safety of the built environment, overly restrictive codes can negatively impact housing affordability and fair

housing choice within a jurisdiction. While the zoning ordinance of the City of Milwaukee and surrounding counties was found to be restrictive, there are opportunities for the region to modify ordinances to further remove barriers to the development of affordable housing across all residential zones.

For example, to encourage more infill development in the traditionally low-density neighborhoods, minimum lot sizes could be further reduced, conversion of established dwellings to multifamily dwellings permitted, and height restrictions relaxed to allow for more density on the same footprint. This would potentially allow for more supply of housing, which helps put downward pressure on rental prices, so that low- and moderate-income families have access to those neighborhoods and all the benefits that come with higher opportunity areas such as access to jobs, better schools, access to transportation, and access to cultural and public amenities.

SP-60 Homelessness Strategy - 91.415, 91.215(d)

Describe how the jurisdiction's strategic plan goals contribute to:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

Members of the Housing Action Coalition and other homeless housing and service providers in Waukesha County and the HOME Consortium reach out to homeless persons, including unsheltered persons, through meal programs, day centers, and hospitals. Outreach teams regularly go under bridges, visit camps, and go to other areas to meet unsheltered homeless persons. During the 2025 program year, the County will fund the Hope Center, Hebron House of Hospitality, the Women's Center, Family Promise of Waukesha County, the Housing Action Coalition, and the Salvation Army for a variety of activities, including to support meal programs, a day center, emergency shelter, and outreach to unsheltered homeless residents.

Waukesha County will continue to provide financial assistance to nonprofit agencies to develop and implement a coordinated assessment system throughout the jurisdiction. The Housing Action Coalition will also continue providing support for annual point-in-time homeless counts.

Addressing the emergency and transitional housing needs of homeless persons.

Waukesha County is an active member of the Housing Action Coalition and the Community Development Division Manager sits on HAC's Board of Directors. In previous program years, the CDBG Board allocated \$1,000,000 to the Housing Action Coalition for the acquisition and rehabilitation of a building to serve as an emergency shelter and service center for homeless women and children. The facility will also offer co-location opportunities for nonprofit homeless service providers. The CDBG Board also plans to fund other emergency and transitional housing providers in the 2025 program year, including:

- The Hope Center – funding programs including a free clothing shop, outreach meals, a day center for people who are homeless and others, transportation assistance, healthcare access assistance, and assistance moving from a shelter to a family residence.
- The Women's Center – serves women, children, and men impacted by domestic abuse, sexual violence, child abuse, and trafficking with emergency shelter, transitional housing, counseling support, childcare, legal advocacy, and employment counseling. The Women's Center also provides community education about violence prevention.
- Hebron Housing Services – funding the supportive service office, which provides housing, services, and case management for men, women, children, and families,

including people who are chronically homeless; and additionally funding emergency shelter operations.

- The Salvation Army – funding the emergency shelter and food insecurity programs.
- Family Promise of Waukesha County – for the provision of emergency shelter.
- The Waukesha Housing Action Coalition – funding for emergency winter overflow shelter.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Waukesha County and the Housing Action Coalition support a Housing First model that prioritizes permanent housing and offers case management and other support services. Over the next five years, the County will continue to support homeless service providers, funders, and stakeholders who recognize the need to shift focus and resources to long-term, permanent housing in order to reduce homelessness. Through its CDBG Board, the County will fund organizations that provide case management and housing navigation services to assist homeless individuals and families, including those staying in emergency shelter, make the transition to permanent housing and prevent returns to homelessness.

In the 2025 program year, the County plans to fund various activities from The Hope Center, The Women's Center, The Salvation Army, Hebron House, Family Promise of Waukesha County, and the Waukesha Housing Action Coalition, The HOME Consortium will also work to increase the availability of affordable housing in the four-county region by using HOME funds to support the development of new affordable rental housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs.

Housing and service providers in Waukesha County work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. These groups include extremely low-income individuals and families, people discharged from institutions, and those receive

assistance from agencies addressing a variety of needs, such as housing, health, social services, education or youth needs. Resources to prevent homeless in Waukesha County include:

- Community Action Coalition, which provides cash grants to help those in need of financial assistance to avoid a housing crisis such as eviction.
- State of Wisconsin's Energy Assistance Program, which provides utility and energy payment assistance.
- ResCare of Waukesha County, which provides funds for rent, security deposits, energy bills or water bills to help avoid homelessness.
- St. Vincent de Paul, which provides program for financial assistance for rent and heating bills and an after-release ministry to support men and women who have been or are being released from a correctional facility.
- The Hope Center, which provides clothing, meals, and other transitional assistance.
- The Women's Center, which provides childcare, employment assistance, legal advocacy, and other transitional services.

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

Actions to Address LBP Hazards and Increase Access to Housing without LBP Hazards

Waukesha County and the HOME Consortium will continue to promote lead-based paint inspections and, if a hazard is found, remediation. This action will both reduce lead exposure risk and help to maintain the region's older, lower and moderately priced housing. Any housing rehabilitation activities conducted using HOME and CDBG funds will continue to be monitored closely for any potential lead exposure. Waukesha County will also continue to work with the health departments of other Consortium counties to identify possible units with lead-based paint hazards.

In addition, the Waukesha County Public Health department maintains an information web page on lead-based paint hazards, exposure, and resources. The Public Health Department offers childhood lead testing and, if necessary, referrals and case management for remediation and management.

How are the actions listed above related to the extent of lead poisoning and hazards?

Lead exposure is a leading environmental health hazard for young children and can create irreversible health problems. This problem is due to high lead content used in paint up until 1978 and is most prevalent in homes built before 1950 or recently remodeled homes built before 1978. Pre-1978 housing occupied by lower income households with children offers particularly high risks of lead exposure due to the generally lower levels of home maintenance among lower income households. This is an important factor since it is not the presence of lead itself that causes health hazards, but instead the deterioration of paint that releases lead-contaminated dust or peels producing lead-contaminated flakes. According to 2016-2020 ACS data, there are over 32,000 homes in the Consortium with two or more risk factors for lead-based paint poisoning.

How are the actions listed above integrated into housing policies and procedures?

Any units built prior to 1978 are assumed to contain lead-based paint, and any work in these units funded with CDBG and HOME funds is closely monitored. Waukesha County adopted the recommendations from EWRPC's Regional Housing Plan into the Housing Element of its Comprehensive Development Plan, one of which recommends the continued use of lead-based paint abatement programs as a mechanism for preserving aging housing and maintaining lower- and moderate-cost housing stock.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for Reducing the Number of Poverty-Level Families

As of the 2018-2022 American Community Survey 5-Year estimates, Jefferson County has the highest poverty rate in the HOME Consortium with a rate of 7.6% of its population living below the poverty level. Waukesha County holds the second highest poverty rate, with a rate of 4.9%, followed by Washington County (4.7%) and Ozaukee County (4.5%). The poverty rates in the HOME Consortium are lower than the overall poverty rate in the state of Wisconsin which is currently estimated at 10.7%.

Projects funded through the Waukesha County and HOME Consortium 2025 CDBG funding will include:

- Supportive services that include outpatient and healthcare services, food pantry programs and community meals, and clothing shops.
- Emergency housing provided by the Women's Center, Hebron Housing Services, the Waukesha Housing Action Coalition, and the Salvation Army Emergency Lodge.
- Housing preservation and rehab services through Habitat for Humanity and the Waukesha County Community Development Department.

How are the jurisdiction's poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The HOME Consortium was created to assist with the construction of affordable housing in the four counties of the HOME Consortium.²² Per HUD's requirements, at least 15% of HOME funding must be set aside for Community Housing Development Organizations (CHDOs). CHDOs must address providing decent and affordable housing to low-income households and have a formal process for securing low-income beneficiaries through the design and development of their projects and programs.

The discussion of housing needs shows that the crucial difference between households with needs and those without needs is income. For households with severely restricted incomes, little discretionary income remains after paying monthly housing costs. One of the objectives of the Consolidated Plan is to encourage new construction of affordable multifamily rental units. Affordable housing will provide the potential to decrease housing costs and allocate

FOOTNOTES

²² Waukesha County, HOME Consortium. Retrieved from: <https://www.waukeshacounty.gov/landandparks/community-development/learn-more-about/HOME%20Program/home-program/core-programs/>

more funds to food, clothing, health care, children's needs, savings, and personal and economic development.

Similarly, the goal of providing home rehabilitation and emergency repair to low- and moderate-income households would allow these families to re-allocate money that would otherwise be spent on maintenance to secure housing. Additionally, making needed home repairs will lower utility costs and help maintain the existing housing stock for future generations. By addressing risks posed by lead-based paint using HUD-funded programs, health care risks, particularly risks for young children, will be reduced.

The Waukesha County and HOME Consortium anti-poverty strategy is in agreement with its housing priorities. The Counties will continue to partner with multiple agencies to examine and evaluate policies to eliminate barriers to access to essential services such as healthcare, meal programs, emergency shelters, and home rehab. In addition to improving stability and quality of life, increasing the number of households and individuals with access to supportive services can provide them with short-term financial relief during difficult times, which may allow them to find long-term housing and employment.

SP-80 Monitoring - 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.

CDBG- and HOME-funded projects are monitored by Waukesha County's Park and Land Use Department staff. The CDBG and HOME Program Boards ensure long-term compliance and review all policy decisions.

At the beginning of each year, Waukesha County enters into subrecipient agreements with each of its social service providers and other subgrantees. These subrecipient agreements are prepared by County staff and reviewed for compliance with HUD regulations.

During the program year, Waukesha County conducts "desk monitoring" for all programs on a regular basis. Staff produce monthly expenditure reports to determine if subgrantees are undertaking projects and making progress in meeting timeliness requirements. Waukesha County also receives a written report six months into the program year and a final year-end report from every subgrantee. In addition, Waukesha County collects MBE/WBE, Section 3, and prevailing wage reports from applicable agencies. Finally, Waukesha County requests information from every city and village in the HOME Consortium area regarding furthering fair housing and addressing impediments to fair housing, on an annual basis.

The County conducts on site monitoring of activities through a combination of Teams meetings and site visits. Monitoring included virtual and in-person meetings, tours and inspections, and an in-depth analysis of program files and procedures.

EXPECTED RESOURCES

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Waukesha County receives a direct Community Development Block Grant (CDBG) allocation from HUD and is the lead agency for the HOME Consortium, through which Waukesha, Jefferson, Ozaukee, and Washington Counties collaborate to receive a direct HOME Investment Partnerships (HOME) allocation from HUD. The table below shows allocations for the 2025 program year, along with anticipated grant funding for the remaining four years covered by this Consolidated Plan. These estimates assume that funding over those four years will average to be about the same as the 2025 allocation.

Additionally, during the 2025 program year, the Waukesha County anticipates receiving about \$60,000 in CDBG program income and the HOME Consortium anticipates receiving about \$200,000 in HOME program income.

Residents of Waukesha County and the HOME Consortium are also eligible for housing assistance through HUD's Section 8 Housing Choice Voucher and Public Housing programs administered by local housing authorities and Continuum of Care programs operated by local agencies and funded through the Wisconsin's Balance of State Continuum of Care.

NOTE: HUD has not announced 2025 CDBG and HOME allocations. Announcements will be made following the passing of the federal budget.

Anticipated Resources

Table 57. Expected Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation	Program Income	Prior Year Resources	Total		
CDBG	Federal	Acquisition Admin and planning Economic development Housing Public improvements Public services	\$1,471,411	\$60,000	\$0	\$1,531,411	\$5,885,644	Waukesha County's 2025 CDBG allocation reflects a 0% change from 2024 funding levels.
HOME	Federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for homeownership TBRA	\$1,342,416	\$200,000	\$0	\$1,542,416	\$5,369,664	The HOME Consortium's 2025 HOME allocation reflects a 0% change from 2024 funding levels.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied.

While CDBG funds do not require a match, Waukesha County anticipates leveraging other public and private investment for a higher return on investment. The County rarely fully funds any program or project, instead requiring leverage ranging from 1:1 in public service dollars, 3:1 in economic development loans, to 10:1 or larger for housing development. CDBG and HOME program income funds generated during this Action Plan will be leveraged to increase services to low- and moderate-income residents within Waukesha County and the HOME Consortium region.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

Waukesha County and the HOME Consortium do not intend to use publicly owned land or property to address the needs identified in this Plan.

ANNUAL GOALS AND OBJECTIVES

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Table 58. Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Maintain and Expand Housing Affordability	2025	2029	Affordable Housing	Countywide HOME Consortium	Homeownership Assistance and Housing Rehabilitation; Affordable Rental Housing	CDBG: \$300,000 HOME: \$1,388,185	Direct financial assistance to homebuyers: 47 households Homeowner housing units rehabilitated: 47 units Rental units constructed: 4 units Homeownership housing added: 10 units Tenant-based rental assistance: 12 households assisted
2	Provide Public Services	2025	2029	Non-Housing Community Development Homeless Non-Homeless Special Needs	Countywide	Public Services; Homeless Housing and Services; Non-Homeless Special Needs	CDBG: \$227,522	Public service activity other than low/moderate income housing benefit: 5,000 individuals assisted

						Housing and Services		Homeless overnight shelter: 360 individuals assisted
3	Improve and Maintain NRSAs	2025	2029	Non-Housing Community Development	Prairieville NRSA	NRSA Revitalization	CDBG: \$229,628	Public service activity other than low/moderate income housing benefit: 1,600 individuals assisted Homelessness prevention: 260 individuals assisted Other: 65 individuals assisted with employment training/job readiness
4	Improve Public Facilities and Infrastructure	2025	2029	Non-Housing Community Development	Countywide	Facility and Infrastructure Improvements	CDBG: \$353,962	Public facility or infrastructure activities other than low/moderate income housing benefit: 5,000 individuals assisted
5	Economic Development	2025	2029	Non-Housing Community Development	Countywide	Economic Development	CDBG: \$70,000	Façade treatment/business building rehabilitation: 4 businesses assisted Microenterprise training: 20 businesses assisted
6	Administration and Planning	2025	2029	Administration and Planning	Countywide HOME Consortium	Administration and Planning Fair Housing	CDBG: \$303,000 HOME: \$154,241	Public service activity other than low/moderate income housing benefit: 130 persons assisted

AP-35 Projects - 91.420, 91.220(d)

Introduction

The County will undertake activities that will address priority needs and objectives established as adopted by the Waukesha County Community Development Block Grant (CDBG) and HOME Boards, as listed below and detailed on the following pages.

Table 59. Project Information

Number	Project Name
1	CDBG Program Administration
2	CDBG Housing Activities
3	CDBG NRSA Activities
4	CDBG Public Services
5	CDBG Public Facilities
6	CDBG Economic Development
7	HOME Program Administration
8	HOME Downpayment Assistance
9	HOME Housing Rehabilitation
10	HOME Purchase Rehabilitation
11	HOME Housing Development
12	HOME CHDO Reserve
13	HOME Tenant-Based Rental Assistance (TBRA)
14	Unallocated Funds

At the time that the draft 2025-2029 Five-Year Consolidated Plan and 2025 Annual Action Plan were published for public comment, HUD had not yet released 2025 allocations. Waukesha County and the HOME Consortium wrote the 2025 Annual Action Plan based on an estimated award amount of \$1,471,411 for CDBG and \$1,342,415 for HOME. Waukesha County will adjust its proposed Plan to match its actual allocation amounts once actual amounts become known.

Waukesha County and the HOME Consortium developed contingency provisions as described in HUD Notice: CPD-25-02 (issued on January 14, 2025), as follows:

CDBG Contingency Provisions

For CDBG, Waukesha County has estimated an unallocated amount of \$47,299. If the actual award amount is less than the estimated award by up to \$47,299, the project amounts will remain the same (except potentially Public Services projects) and the unallocated amount will be decreased accordingly. All Public Services awards will be decreased proportionately to maintain the Public Service cap of 15% if needed. If the actual award is more than the estimated amount of funding, all extra funding will increase the unallocated amount and be available for out-of-cycle applications in 2025. If the actual award is less than \$1,424,112, all awards will be decreased proportionately.

HOME Contingency Provisions

For HOME, if the actual award amount is less than anticipated, up to \$186,813 less, the Housing Development project will be decreased and all other projects remain the same. If the actual award has a larger decrease than \$186,813, all program areas will be decreased proportionately.

1	Project Name	CDBG Program Administration
	Target Area	Countywide
	Goals Supported	Administration and Planning
	Needs Addressed	Administration and Planning Fair Housing
	Funding	CDBG: \$303,000
	Description	CDBG program administration and fair housing education/outreach.
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Public service activity other than low/moderate income housing benefit: 130 individuals assisted
	Location Description	Waukesha County Administration Center
2	Planned Activities	Waukesha County: General administration functions for Waukesha County to run the CDBG program for the County. Metro Milwaukee Fair Housing: Promote equal access to housing for all people in Waukesha County. UW Extension: CAPER Research.
	Project Name	CDBG Housing Activities
	Target Area	Countywide
	Goals Supported	Maintain and Expand Housing Affordability
	Needs Addressed	Homeowner Assistance and Housing Rehabilitation

	Funding	CDBG: \$300,000
	Description	Housing projects
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Homeowner housing rehabilitated: 25 housing units
	Location Description	Locations throughout Waukesha County to be determined during the program year.
	Planned Activities	City of Waukesha: Landmark Paint/Repair Habitat for Humanity of Waukesha County: Home Preservation Program Waukesha County Community Development: Waukesha County Housing Rehab Program
3	Project Name	CDBG NRSA Activities
	Target Area	Prairieville NRSA
	Goals Supported	Improve and Maintain NRSA
	Needs Addressed	NRSA Revitalization
	Funding	CDBG: \$229,628
	Description	Activities within the Neighborhood Strategy Revitalization Area (NRSA).
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Public service activity other than low/moderate income housing benefit: 1,600 individuals assisted Homelessness prevention: 260 individuals assisted Other: 65 individuals assisted with employment training/job readiness

Location Description	NRSA boundaries
	Hope Center, Inc: Day Center
	Hope Center, Inc: Community Meal Program
	Hope Center, Inc: Clothing Shop
	Hope Center, Inc: Employment/Medical Transportation Assistance
	Tower Hill Neighborhood Association, Inc: Emerging Leaders Career, College & Civic Readiness
	Waukesha Free Clinic, Inc: Prescription Medication & Medical Supplies for Medically Underserved
Planned Activities	
Project Name	CDBG Public Services
Target Area	Countywide
Goals Supported	Provide Public Services
Needs Addressed	Public Services
	Homeless Housing and Services
	Non-Homeless Special Needs Housing and Services
4 Funding	CDBG: \$227,522
Description	Public services
Target Date	12/31/2025
Estimated Number and Type of Families to Benefit	Public service activity other than low/moderate income housing benefit: 5,000 individuals assisted
	Homeless overnight shelter: 360 individuals assisted
Location Description	Locations throughout Waukesha County

Planned Activities

City of Waukesha: Adaptive Inclusion Specialist
City of Waukesha: Horeb Swim Park and Play
City of Waukesha: Buchner Swim Park and Play
City of Waukesha: Senior Activity Coordinator
Community Action Coalition for South Central WI: Culturally Appropriate Food
Community Outpatient Services of Menomonee Falls, Inc: Community Outreach Health Clinic
Easterseals Southeast Wisconsin, Inc: Safe Babies Healthy Families
Eras Senior Network, Inc: Faith in Action Waukesha County
Family Promise of Waukesha County, Inc: The Apartment Shelter Program
Food Pantry of Waukesha County, Inc: Food Pantry Home Delivery Program
Hebron Housing Services: General Operations for Emergency Shelter
Journey21, Inc: Transportation for Journey21's Three Educational Academies
La Casa de Esperanza: Your Path to Homeownership
Lake Area Free Clinic: Dental Services for Low-Income Adults
Oconomowoc Silver Streak, Inc: Newer Used Vehicle
Parents Place, Inc: Community Education
Parents Place, Inc: Supervised Visitation
Seniors on the GO! Taxi Service, Inc: Expansion/Replacement Car Funding
The Salvation Army: Emergency Shelter Lodge
The Salvation Army: Food Insecurity Prevention Program
The Women's Center: Children's Sexual Abuse Project
The Women's Center: Shelter Project
The Women's Center: The C.A.R.E Center

5	Project Name	CDBG Public Facilities
	Target Area	Countywide
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Facility and Infrastructure Improvements
	Funding	CDBG: \$353,962
	Description	Facility and infrastructure improvements.
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Public facility or infrastructure activities other than low/moderate income housing benefit: 5,000 individuals assisted
6	Location Description	Locations throughout Waukesha County
	Planned Activities	City of Waukesha: ADA Public Works
		City of Waukesha: ADA Public Infrastructure
		City of Waukesha; Public Art Fund
		Hebron Housing Services: Supportive Services Offices
	Project Name	CDBG Economic Development
6	Target Area	Countywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$70,000

	Description	Economic development activities.
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Façade treatment/business building rehabilitation: 4 business assisted Microenterprise training: 20 businesses assisted
	Location Description	Locations throughout Waukesha County
	Planned Activities	City of Waukesha: Downtown Façade Program Wisconsin Women's Business Initiative Corporation (WWBIC): Training and Technical Assistance for LMI Microentrepreneurs
7	Project Name	HOME Program Administration
	Target Area	HOME Consortium
	Goals Supported	Maintain and Expand Housing Affordability
	Needs Addressed	Administration and Planning
	Funding	HOME: \$154,241
	Description	HOME program administration
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Not Applicable
	Location Description	Waukesha County Administration Center
	Planned Activities	Waukesha County: General administration functions for Waukesha County to run the HOME program for the HOME Consortium.

8	Project Name	HOME Downpayment Assistance
	Target Area	HOME Consortium
	Goals Supported	Maintain and Expand Housing Affordability
	Needs Addressed	Homeownership Assistance and Housing Rehabilitation
	Funding	HOME: \$300,000
	Description	Downpayment assistance
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Direct financial assistance to homebuyers: 40 households assisted
	Location Description	Locations throughout the HOME Consortium to be determined during the program year.
	Planned Activities	Direct financial assistance to qualified homebuyers of up to \$10,000.
9	Project Name	HOME Housing Rehabilitation
	Target Area	HOME Consortium
	Goals Supported	Maintain and Expand Housing Affordability
	Needs Addressed	Homeownership Assistance and Housing Rehabilitation
	Funding	HOME: \$225,000
	Description	Rehabilitation program
	Target Date	12/31/2025

	Estimated Number and Type of Families to Benefit	Homeowner housing units rehabilitated: 15 units
	Location Description	Locations throughout the HOME Consortium to be determined during the program year.
	Planned Activities	Homeowner housing rehabilitation program that provides no-interest loans to eligible homeowners to repair their homes.
10	Project Name	HOME Purchase Rehabilitation
	Target Area	HOME Consortium
	Goals Supported	Maintain and Expand Housing Affordability
	Needs Addressed	Homeownership Assistance and Housing Rehabilitation
	Funding	HOME: \$175,000
	Description	Purchase rehab program
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Direct financial assistance to homebuyers: 7 households assisted Homeowner housing units rehabilitated: 7 units
	Location Description	Locations throughout the HOME Consortium to be determined during the program year.
	Planned Activities	Direct financial assistance and/or no-interest loans to qualified homeowners to assist in the purchase and rehabilitation of a home.

11	Project Name	HOME Housing Development
	Target Area	HOME Consortium
	Goals Supported	Maintain and Expand Housing Affordability
	Needs Addressed	Affordable Rental Housing Homeownership Assistance and Housing Rehabilitation
	Funding	HOME: \$186,813
	Description	Housing development projects
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Homeowner housing added: 10 units
	Location Description	Locations throughout the HOME Consortium to be determined during the program year.
	Planned Activities	Funding to assist in development of new affordable for-sale housing.
12	Project Name	HOME CHDO Reserve
	Target Area	HOME Consortium
	Goals Supported	Maintain and Expand Housing Affordability
	Needs Addressed	Affordable Rental Housing
	Funding	HOME: \$201,362
	Description	CHDO housing development projects

	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Rental units constructed: 4 units
	Location Description	Locations throughout the HOME Consortium to be determined during the program year.
	Planned Activities	Funding to assist in development of new affordable rental housing by one or more CHDOs.
13	Project Name	HOME Tenant-Based Rental Assistance (TBRA)
	Target Area	HOME Consortium
	Goals Supported	Maintain and Expand Housing Affordability
	Needs Addressed	Affordable Rental Housing
	Funding	HOME: \$300,000
	Description	Tenant-based rental assistance (TBRA)
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Tenant-based rental assistance: 12 households assisted
	Location Description	Locations throughout the HOME Consortium to be determined during the program year.
	Planned Activities	Funding to assist very low AMI households through rent subsidies, utility subsidies, and executing of successful case management services.

14	Project Name	Unallocated Funds
	Target Area	Countywide
	Goals Supported	Maintain and Expand Housing Affordability
		Improve and Maintain NRSAs
		Improve Public Facilities and Infrastructure
		Economic Development
	Needs Addressed	Homeownership Assistance and Housing Rehabilitation
		Affordable Rental Housing
		NRSA Revitalization
		Facility and Infrastructure Improvements
		Economic Development
	Funding	CDBG: \$47,299
	Description	Activities to be determined during the program year
	Target Date	12/31/2025
	Estimated Number and Type of Families to Benefit	Not applicable
	Location Description	Waukesha County
	Planned Activities	Funding to assist in various CDBG-eligible activities to be determined during the program year.

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed.

In 2024, Waukesha County worked with UW-Extension of Waukesha County to collect stakeholder input regarding the Prairieville NRSA. Waukesha County previously had identified three separate NRSA, and community input informed the process through which those NRSA boundaries were combined and expanded to form the Prairieville NRSA. Residents, organizations and community and city leaders were surveyed and interviewed. A survey instrument was developed and shared with community partners, organizations, and residents in the area. Additionally, resident-based groups were engaged for feedback regarding NRSA boundary updates. Participants generally preferred the expanded Prairieville NRSA boundary to the previous three NRSA. Numerous comments also focused on undeveloped land and potential redevelopment sites to address housing challenges within the Prairieville NRSA.

Goals for addressing needs within the Prairieville NRSA include:

1. Address housing challenges by strengthening residential property investment with rehabilitation, new development, and in-fill development.
 - Support and expand efforts for exterior home improvements.
 - Maintain and improve housing stock through home repair programs.
 - Increase community efforts to expand programs that preserve, build, and rehab housing units.
 - Promote opportunities to increase homeownership for those employed in the NRSA.
 - Hold an annual housing resource to share resources with NRSA residents.
 - Initiate conversations with landlords, elected officials, and other stakeholders to address concerns around rental property conditions and nuisances.
 - Explore opportunities for land acquisition for new housing development.
 - Engage community stakeholders and brokers to encourage housing development on undeveloped parcels.
2. Support neighborhood empowerment initiatives for positive impact with quality of life.
 - Strengthen neighborhood partnerships to improve public services and safety.
 - Develop an ad-hoc community team to study and identify opportunities to improve walkability, bicycle friendliness, and public safety in the NRSA.
 - Develop opportunities for potential public/private partnerships 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 lifelong wellness.
 - Create neighborhood opportunities for residents to strengthen relationships, address shared issues, and conduct resident-led beautification projects.

3. Foster a NRSA-based approach to focus on economic empowerment through resident skill development and support for locally-owned enterprises.
 - Support development of a group to provide non-profit Community-Based Development Organization leadership to implement NRSA strategies.
 - Strengthen capacity with the Redevelopment Authority to address opportunities in the NRSA's, increasing its ability to develop a more robust Common Council and collaborate with the Community Development Department.
 - Increase support for business development.
 - Increase economic empowerment opportunities with job training, job development, and education leading to higher paying jobs.
 - Connect NRSA residents with "closer to home" job opportunities.
 - Build out the entrepreneurial ecosystem to support sustainable microenterprise.

Geographic Distribution

The table below shows the breakdown of CDBG funding by geography for the 2025 program year. As shown, an estimated 15% of funds (or \$229,628) will be spent within the Prairieville NRSA boundaries. The remaining 85% (including program administration funds) will be spent on activities throughout the county.

Table 60. Geographic Distribution

Target Area	Percentage of Funds
Prairieville NRSA	15%
Countywide	85%

One-hundred percent (100%) of HOME funding will be spent on activities throughout the HOME Consortium, which includes Waukesha, Washington, Jefferson, and Ozaukee Counties.

AFFORDABLE HOUSING

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

During the 2025 program year, Waukesha County and the HOME Consortium anticipate assisting 120 households with affordable housing. Housing activities will include:

- Homeowner housing rehabilitation funded through CDBG and HOME to assist 25 households in Waukesha County and an additional 22 households in the HOME Consortium.
- Down payment assistance funded through HOME to assist 47 households within the HOME Consortium.
- Development of new affordable for-sale and rental housing funded through HOME resulting in 10 new affordable for-sale units and 4 new affordable rental units.
- Tenant-based rental assistance for 12 households funded through HOME.

Table 61. One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	47
Special-Needs	0
Total	120

Table 62. One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	12
The Production of New Units	14
Rehab of Existing Units	47
Acquisition of Existing Units	47
Total	120

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

Waukesha, Jefferson, Ozaukee, and Washington county residents are served by the Waukesha Housing Authority, Jefferson Housing Authority, West Bend Housing Authority (Washington County), Slinger Housing Authority (Washington County), Watertown Housing Authority (Jefferson County), and Lake Mills Housing Authority (Jefferson County). According to HUD's internal data, there are currently 265 public housing units and 880 tenant-based rental assistance units available within Waukesha County. Within the entire HOME Consortium, which includes Waukesha, Jefferson, Washington, and Ozaukee Counties, there are a total of 449 public housing units and 1,124 tenant-based rental assistance units available.

Actions Planned During the Next Year to Address the Needs to Public Housing

During the 2025 program year, all housing authorities within the HOME Consortium will continue to provide affordable housing options for residents of the region. The Waukesha Housing Authority will also continue to collaborate with other local non-profit service providers in order to maximize and optimize available services.

Actions to Encourage Public Housing Residents to Become more Involved in Management and Participate in Homeownership

The Waukesha Housing Authority will continue to operate its resident counsel to encourage resident involvement in decision making processes. It will also continue its Family Self-Sufficiency program that assists families move from public housing to homeownership. The program provides job training; educational, childcare, medical, or mental health services; transportation; life skills and legal information; emergency services; and housing services. It also provides financial incentives through an escrow savings account for continual participation and investment in the program.

In addition, the Waukesha Housing Authority will continue to collaborate with other local non-profit service providers in self-sufficiency areas such as workforce development and work readiness programs.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance.

Not applicable.

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

This section details the homelessness and other special needs activities to be funded by Waukesha County and the HOME Consortium during the 2025 program year.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

Over the next year, the Housing Action Coalition other homeless housing and service providers in Waukesha County and the HOME Consortium will continue reaching out to homeless persons, including unsheltered persons, through meal programs, day centers, and hospitals. During the 2025 program year, the County will fund the Hope Center, Hebron House of Hospitality, the Women's Center, The Hope Center, The Housing Action Coalition, and the Salvation Army for a variety of activities, including to support meal programs, a day center, and outreach to unsheltered homeless residents.

Addressing the emergency shelter and transitional housing needs of homeless persons.

During the 2025 program year, the CDBG Board will fund the following emergency shelter and transitional housing providers:

- Hebron House of Hospitality, which provides emergency shelter at Hebron and Sienna Houses and transitional housing for adults experiencing homelessness and mental illness at Jeremy House. In 2025, Hebron House will receive CDBG funding for emergency shelter, case management, and other homeless services.
- The Women's Center, which provides emergency shelter and transitional housing for individuals and families impacted by domestic violence, sexual violence, child abuse or trafficking. In 2025, the Women's Center will receive CDBG funding to assist its emergency shelter, sexual abuse counseling program, and C.A.R.E. center.
- Salvation Army provides a men's emergency shelter. In 2025, Salvation Army will receive CDBG funding to support its emergency lodge and community meal program.
- The Hope Center, which provides programs including a free clothing shop, outreach meals, a day center for people who are homeless and others, transportation assistance, healthcare access assistance, and assistance moving from a shelter to a family

residence. In 2025, the Hope Center will receive CDBG funding for a day center, a community meal program, clothing provision, and transportation assistance.

- The Waukesha Housing Action Coalition, which collaborates to oversee and implement homeless service provision. In 2025, the Coalition will receive CDBG funding for the provision of a winter emergency overflow shelter.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

During the 2025 program year, Waukesha County will fund organizations that provide case management and housing navigation services to assist homeless individuals and families, including those staying in emergency shelter, make the transition to permanent housing and prevent returns to homelessness. This includes case management and other transitional assistance from Hebron House, The Women's Center, and the Hope Center. The HOME Consortium will also work to increase the availability of affordable housing in the four-county region by using HOME funds to support the development of new affordable rental housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

During the 2025 program year, housing and service providers in Waukesha County will continue to work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness. Organizations and resources to prevent homelessness that will be in place during the 2025 program year in Waukesha County include:

- Community Action Coalition: cash grants to help those in need of financial assistance to avoid a housing crisis such as eviction.
- State of Wisconsin's Energy Assistance Program: provides utility and energy payment assistance.

- ResCare of Waukesha County: funds for rent, security deposits, energy bills or water bills to help avoid homelessness.
- St. Vincent de Paul program: financial assistance for rent and heating bills, and an after-release ministry to support men and women who have been or are being released from a correctional facility.
- The Hope Center: provides clothing, meals, and other transitional assistance.
- The Women's Center: provides childcare, employment assistance, legal advocacy, and other transitional services.

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AP-75 Barriers to Affordable Housing - 91.420, 91.220(j)

Introduction

The Milwaukee 2020 Regional Analysis of Impediments to Fair Housing Choice (AI) identified the following barriers to fair housing choice:

- Lack of a Regional Housing Strategy or Plan
- Lack of Regionally Dispersed Affordable Housing
- Restrictive Local Land Use Regulations and Other Ordinances
- Restrictive Zoning Regulations for Group Homes and Community Living Facilities
- Prevalent “Fear of Others” existing among residents, including NIMBYism
- Strong Jobs-Housing Transit Mismatch
- Lack of Fair Housing Guidance and Enforcement
- Lack of Accessible Housing for Persons with Disabilities
- Gap in Homeownership by Racial and Ethnic Minorities Compared to White Households
- Overcrowded Housing
- Extensive Use of Evictions
- Racial and Ethnic Disparities in Mortgage Lending, Insurance, and Appraisal Practices
- Lack of Awareness of Fair Housing Laws

Survey respondents and community workshop participants noted a particular need for development of affordable rental housing. However, stakeholders also emphasized the need to develop housing for all income levels. Although low-income households have fewer choices in terms of finding suitable housing, households of various income levels are struggling to find housing and thus further limit the options available for lower-income households.

In addition to these public-sector barriers, the private market can also create barriers. As discussed in earlier sections, some landlords may refuse to rent units to households receiving other forms of housing assistance. Known as source of income discrimination, this practice reduces the affordability of existing units in the private housing stock and creates barriers to obtaining affordable housing. The poor quality of some rental housing units also makes them unsuitable for occupancy, thus removing further units for the counties’ rental housing inventory.

What actions are planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment?

The HOME Consortium jurisdictions will continue to work to increase the affordable housing stock in the region by addressing the barriers to fair housing detailed in the City of Milwaukee's 2020 Regional Analysis of Impediments to Fair Housing Choice, including supporting the development of affordable housing, improving access to affordable housing for residents with disabilities, and increasing access to homeownership. Particularly, the Counties will continue to work towards forming a regional housing strategy that results in more equitable distribution of affordable housing opportunities throughout the counties and individual communities. Currently, the majority of the region's publicly subsidized housing is located in the City of Milwaukee, leaving very few available units in other communities. The AI also emphasized that the communities with the least affordable housing available contain lower poverty rates and higher access to opportunities such as employment, school quality, and more. The HOME Consortium must continue to encourage affordable housing development in areas that tend to price out low-income households to ensure all residents can afford to in high opportunity areas.

The following AI recommendations, which the HOME Consortium can implement to lower barriers to affordable housing, are in accordance with this Consolidated Plan:

- Members of the Collaborative should encourage communities to use CDBG and HOME funds as well as other financial incentives to develop affordable housing in low poverty/high opportunity areas, especially areas outside the city of Milwaukee. Potential financial incentives to encourage private sector development of affordable housing include tax abatements.
- Collaborative members should encourage proper maintenance of naturally occurring, privately owned affordable rental housing in the region that is not publicly subsidized, including older housing stock.

Stakeholders noted the importance for local governments to form relationships with developers who are interested in creating affordable housing by creating incentives that can help attract more developers into the region. Local developers who participated in interviews emphasized the need for the Counties to declare their support for affordable housing and work with developers to ensure these developments can be created. The following recommendations from the AI address restrictive zoning and land use regulations that can be revised in order to promote inclusive and affordable housing development:

- Residential zoning district maximum density and/or minimum floor area ratio requirements that might restrict affordable multifamily housing development.

- Regulations that restrict higher densities and mix of housing types.
- Restrictions on alternative types of affordable housing, such as accessory dwellings and manufactured homes.
- Design regulations that drive up development and construction costs.

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AP-85 Other Actions - 91.420, 91.220(k)

Introduction

The HOME Consortium works with a variety of community partners to ensure safe and affordable housing for its Counties' residents, to meet underserved needs and reduce poverty, to develop local institutional structure, and enhance coordination between public and private sector housing and community development agencies. A mix of funding resources support these efforts, including CDBG and HOME funds, other federal funds, state and local funding, and private investment.

Actions Planned to Address Obstacles to Meeting Underserved Needs

The primary obstacle to meeting underserved needs is the limited amount of funding available to address identified priorities. Waukesha County and the HOME Consortium continually seeks public and private resources to leverage its entitlement funds and expand the breadth of programs that can be provided. Partnerships with Waukesha County Community Development, the Waukesha Housing Action Coalition, local nonprofit organizations, and other public and private organizations receive grant funds and provide additional staff and organizational resources to address underserved needs.

During PY2025, the HOME Consortium will allocate funding to the following agencies:

- The Community Action Coalition for South Central WI will receive \$5,000 to provide culturally appropriate foods in the region.
- The Community Outpatient Services of Menomonee Falls Inc. will receive \$8,000 for their Community Outreach Health Clinic.
- Easterseals Southeast Wisconsin, INC., will receive \$8,000 to fund their Safe Babies Healthy Families program.
- The Food Pantry of Waukesha County, Inc., will receive \$5,000 for their Home Delivery Program.

The HOME Consortium will provide funds to several other agencies as well, with an estimated total funding allocation of \$1,531,411.

Actions Planned to Foster and Maintain Affordable Housing

The HOME Consortium will spend an estimated \$1,542,416 on activities to foster and maintain affordable housing during the 2025 program year. Specific activities will include:

- \$186,813 will be allocated for Housing Development
- \$300,000 will be allocated for the Downpayment Assistance Program
- \$225,000 will be allocated for the Housing Rehabilitation Program
- \$175,000 will be allocated for the Purchase Rehabilitation Program

Actions Planned to Reduce Lead-Based Paint Hazards

An important initiative emanating from HUD in the last decade is the reduction of lead-based paint hazards, and many jurisdictions around the country have focused on reaching this goal. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992) amends the Lead-Based Paint Poisoning Prevention Act of 1971, which is the law covering lead-based paint in federally funded housing. These laws and subsequent regulations issued by the U.S. Department of Housing and Urban Development (24 CFR part 35) protect young children from lead-based paint hazards in housing that is financially assisted or being sold by the federal government.

As Waukesha County and the HOME Consortium undertakes property rehabilitation projects, the Counties will assess whether lead-based paint might be present and, if so, follow the guidelines set forth in the Residential Lead-Based Paint Hazard Reduction Act of 1992. The Counties are committed to testing and abating lead in all pre-1978 housing units assisted with federal grant funds in any of the housing programs it implements.

Actions Planned to Reduce the Number of Poverty-Level Families

Waukesha County and the HOME Consortium will continue to collaborate with human service, social service, and economic development agencies and organizations to facilitate their efforts and maximize their resources to provide quality services to low-income residents to help them improve their incomes. This includes ongoing efforts in conjunction with CoC community partners to meet benchmarks demonstrating an end to homelessness. In PY 2025, the HOME Consortium will provide funding to agencies such as Hope Center, Inc., La Casa de Esperanza, Parents Place, The Women's Center, Family Promise, and other agencies that focus on family education, financial literacy, parent engagement, and more.

Actions Planned to Develop Institutional Structure

Over the 2025 program year, the HOME Consortium staff will continue to participate in HUD-sponsored training and webinars in order to further knowledge and incorporate regulatory changes into the program. The Housing & Community Development staff will continue to review policies and procedures to make modifications where needed to ensure that the programs are managed as outlined in the Policies and Procedures Manuals while complying with all HUD regulations. Lastly, staff will continue to provide technical assistance to subrecipients to assist in expanding the capacity of program partners and to ensure that their policies and procedures are in compliance with the Counties' and HUD regulations.

Actions Planned to Enhance Coordination Between Public and Private Housing and Social Service Agencies

Over the 2025 program year, the HOME Consortium will continue to coordinate planning activities with private housing agencies and social service providers. For example, agencies

such as Habitat for Humanity Waukesha and Family Promise of Washington County will continue to provide housing assistance as well as continue working on housing development and rehabilitation in the region. The funded projects will assist recipients of short-term rental assistance maintain housing and job stability and gain familiarity with community resources.

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PROGRAM SPECIFIC REQUIREMENTS

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

The following identifies program income that is available for use that is included in projects to be carried out in 2025 and provides other required information about the CDBG and HOME programs in Waukesha County and the HOME Consortium.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed.	\$60,000
The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	\$0
The amount of surplus funds from urban renewal settlements.	\$0
The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	\$0
The amount of income from float-funded activities.	\$0
Total Program Income	\$60,000

Other CDBG Requirements

The amount of urgent need activities	0%
The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.	70%
Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	2025

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not applicable; no other forms of investment are being used beyond those identified in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The HOME Consortium uses HUD-provided homeownership limits for its homebuyer activities.

The HOME Consortium's Policy and Procedure Manual requires that, for homebuyer activities, the participating jurisdiction (PJ) must impose long-term affordability through resale or recapture provisions:

- Resale ensures that units assisted with HOME funds remain affordable throughout the affordability period. If a unit is sold during the affordability, it must be sold to another low-income homebuyer at an affordable sales price, while also providing a "fair return" for the original homebuyer. The period of affordability is based on the total HOME assistance in the project including direct assistance and development assistance to an owner, developer or sponsor. The HOME Consortium does not use the Resale provision and does not use definitions of "fair return" or "affordability to a reasonable range of homebuyers."
- Recapture allows the PJ to recapture all or a portion of the HOME subsidy in a property that is sold or transferred during the affordability period, and subsequently reinvested in other HOME eligible activities. The amount subject to recapture and the affordability period is based on the amount of direct assistance to the homebuyer. The HOME Consortium usually uses the Recapture provision, as described in Question 3 below.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The HOME Consortium's Down Payment Assistance (DPA) program outlines the following resale/ recapture provisions in its Homebuyer Grant Agreement:

- Grantee shall be entitled to retain such funds provided the Grantee remains in both ownership and occupancy of the mortgaged premises for a period of five (5) years. In the event the Grantee terminates either ownership or occupancy of the premises within five (5) years, Grantee shall be required to reimburse the HOME Consortium an amount equal to the grant amount less a deduction equal to twenty percent (20%) thereof for each full year Grantee has owned and resided in the mortgaged premises, commencing on the date of the grant.

- In the event of a voluntary or involuntary transfer of the property during the applicable period of affordability, the Grantor will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided as downpayment assistance in the form of a deferred 0% interest loan. The loan will be forgiven prorata over the period of affordability (5 years), as long as the home remains the principal residence of the home buyer. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the prorated amount of the HOME subsidy, the Grantor shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. "Net proceeds" is defined as the sales price minus superior loan repayment and any closing costs incurred by the homebuyer.
- If Grantee refinances and the Property remains subject to the encumbrance created by this Agreement, then Grantee shall not be required to repay any portion of the Grant.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable; the HOME Consortium does not plan to use HOME funds to refinance existing debt secured by multifamily housing rehabilitated with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not applicable

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not applicable.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not applicable.