Chapter 4

Job/Housing Balance

INTRODUCTION

The third major housing plan category concerns the concept of the job/housing balance and how it fits into the Regional Housing Plan (RHP). SEWPRC provides a discussion of job/housing balance in Chapter VIII of the preliminary RHP. First, it presents a formal definition of job/housing balances and imbalances, including an inventory of the Region’s major employment centers and an analysis of the current job/housing balance; second, it provides projected job/housing balance issues based on analyses of community comprehensive plans; third, it provides a discussion on affordable housing and economic development; and a summary of the findings that lead to the preliminary recommendations.

Job/Housing balance is a planning goal to create or achieve a preferred ratio of jobs to housing units within a given area or community. Ultimately, it is a way to provide adequate affordable housing opportunities in close proximity to job locations that otherwise lack housing for low- to moderate- wage workers. It is based on the proposition that the jobs available within a community or specific geographic area should match the labor force skills and the household incomes in terms of affordable housing.¹ One of the goals of improving or achieving a job/housing balance is to reduce public costs, such as costs associated with the impacts on transportation infrastructure through the reduction of vehicle miles travelled (VMT) and congestion, in addition to providing housing that is affordable to a community’s workforce.

As stated in Chapter II of the preliminary RHP, SEWRPC identifies job/housing imbalances as one of the seven components of the Regional housing problem:

- A job/housing imbalance within sub-areas of the Region and the Region as a whole, particularly an adequate supply of affordable or “workforce” housing near employment centers

A critical component of the job/housing balance problem is the provision of affordable housing. Job/housing imbalances within most communities are usually caused by a lack of affordable housing near their job centers; communities that have a considerable number of low-wage jobs with few affordable units tend to have higher job/housing imbalances.

A discussion about job/housing balance is set forth in the RHP in Chapter VIII and recommendations are set forth in Chapter XII. Chapter VIII of the RHP presents information on the job/housing balance as it applies to the Region, a discussion of how it impacts environmental justice communities, an examination of the relationships between employment, housing and transit, a projected job/housing balance analysis, and further discussion on its potential impact on affordable housing and economic development. Chapter XII provides the recommended housing plan for the Region, which includes preliminary recommendations that apply to job/housing balance.

This chapter will first provide a summary of SEWRPC's approach to issues concerning job/housing balance, secondly, provide some background and context as to how current economic conditions have impacted efforts to improve job/housing balance, and finally, provide an analysis of the recommendations set forth within the RHP in light of current and projected housing and economic conditions.

PRELIMINARY REGIONAL HOUSING PLAN AND ISSUES IDENTIFIED CONCERNING JOB/HOUSING BALANCE

SEWRPC's Legacy 1975 Regional Housing Plan
As stated in Chapter 1, SEWRPC set forth a Regional Housing Plan in 1975, referred to as the Legacy Regional Housing Plan, which identified many of the same issues and problems that continue to this day (housing discrimination, barriers to affordable housing) and identified a series of economic, economic, and social constraints as the regional housing problem.\(^2\) Although the concept of “job/housing balance” had not yet been created\(^3\), the 1975 plan addressed some of the issues surrounding the need to provide affordable housing units in areas located near growing job centers (“the provision of adequate locational choice of housing”). The 1975 plan included a housing allocation strategy and set forth a series of recommendations, divided into two categories (nonsubsidized and subsidized housing); most of these recommendations were based on the premise that preserving and promoting affordable housing was the central tenet of the 1975 RHP. Additionally, it included recommendations to improve the job/housing imbalances that had been growing throughout the Region.

The current preliminary RHP addresses the recommendations set forth in the Legacy RHP in Chapters III and XII. Tables III-10 and III-11 in Chapter III display the 1975 Legacy recommendations (for unsubsidized and subsidized housing categories) that support improving the job/housing balance. Recommendations related to co-locating housing based on employment are summarized as follows:

- **Nonsubsidy Housing Recommendations**

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\(^3\) Dr. Robert Cervero, University of California Berkeley’s Department of City and Regional Planning and Institute of Urban and Regional Development, developed the concept of jobs/housing balance, in *Jobs-Housing Balancing and Regional Mobility*, American Planning Association, Spring 1989. Accessible online at [http://www.uctc.net/papers/050.pdf](http://www.uctc.net/papers/050.pdf)
o Abatement of Institutional Constraints
  ▪ All urban communities should incorporate provisions that allow for a full range of residential structure types (single-, two-, and multi-family), housing sizes, and lot sizes, within their zoning ordinance, and Planned Unit Development (PUD) as a conditional use within residential zoning districts

o Abatement of Social Constraints
  ▪ The State should establish a housing appeals board to review applications for the construction or modification of low- and moderate-income units that are rejected at the local level. In its review, the appeals board should consider the following: any existing need for, or shortage of, low- and moderate-income housing in the area; employment opportunities within the area; transportation facilities; the availability of necessary public services and facilities; and the fiscal capability of the area to absorb such housing in terms of levels of personal income and property values. The appeals board should be empowered to issue a permit allowing the construction of low- and moderate-income housing in those instances where good cause for the original rejection cannot be shown.

- Subsidy Housing Recommendations
  o Priority Areas for Programs Involving New Housing Construction
    ▪ The determination of priority areas with respect to new subsidized housing construction was based on two measures of area suitability: employment opportunities and developable land. Sites for the construction of low- and moderate-income housing should be located within reasonable travel time from employment centers for the prospective inhabitants. In this regard, a housing analysis area was considered a priority area with respect to new subsidized construction only if it generated 4,000 jobs or more. It is recommended that in screening applications for subsidy funds for the construction of new housing, the administering agencies concerned give priority to housing proposed to be located in areas that have both sufficient employment opportunities and sufficient amounts of developable land to support the new residential development.
    ▪ Priority areas for New Subsidized Housing Construction were identified as those projected to generate 4,000+ employment opportunities with significant, available land for development. Priority areas were concentrated near recently urbanized areas throughout the Region because of employment and land access opportunities. Priority areas include Brookfield, Brown Deer, Burlington, Cedarburg, Cudahy, Darien, Delevan, Elm Grove, Fontana on Geneva Lake, Genoa City, Glendale, Grafton, Greendale, Greenfield, Hales Corners, Hartford, Kenosha, Lake Geneva, Menomonee Falls, Mequon, New Berlin, North Bay, Oak Creek, Oconomowoc, Port Washington, Racine, Slinger, South Milwaukee, Thiensville, Walworth, Waukesha, Wauwatosa, West Allis, West Bend, Williams Bay, and Wind Point (subareas 2, 4, 5, 7, 10, 14, 15, 26, 29-34, 39, 40, 43, 44, 49-51, 59, and 60)

Some of the recommendations set forth in the Legacy 1975 RHP related to co-locating housing with employment were carried over to the current RHP and are discussed in Chapter XII (Recommended Housing Plan for the Region). Both the Legacy and current preliminary RHPs set forth recommendations that would require changes to zoning codes that would provide for a wider range of housing and lot sizes and more flexible zoning, such as incorporation of PUD. The Legacy recommendation regarding
zoning and housing square footage specified a variable minimum square footage of improved floor area based on number of bedrooms per unit, over a total minimum house size. For example, minimum square footage for a two bedroom house was 700 square feet, and 1,230 square feet for a four bedroom house; page 425 of the 1975 Legacy Regional Housing Plan lists the minimum requirements. Currently, most zoning codes are not so prescriptive, therefore, this recommendation was not carried over as stated, although the intent, to allow for smaller units, is still valid.

The Legacy recommendation to co-locate subsidized housing with employment locations carries over, somewhat, to some of the recommendations set forth under the Subsidized and Tax Credit Housing section. Due to some changes in law and Federal practices, however, the Legacy recommendation needed to be updated to incorporate the changes; for example, under the Housing and Community Development Act of 1974, subsidized housing is more often provided through vouchers rather than tied to a specific development. Additionally, the advent of tax credits to assist in the development of low-income housing is more relevant today than it was in 1975.

Summary of Job/Housing Balance as it Applies to the Preliminary Regional Housing Plan
Chapter VIII of the RHP provides data on Job/Housing Balance issues within the Region, including a discussion of the relationship between jobs and housing and an analysis of the existing balance of jobs and housing in the Region (Part 1), an analysis of the projected job/housing balance in 2035 (Part 2), and a discussion of how improving the job/housing balance impacts affordable housing and economic development throughout the Region (Part 3).

Part 1 describes the relationship between jobs and housing that includes a discussion of the need for affordable housing near major employment centers, job/housing imbalances throughout the Region, and the need for public transit connections between areas with affordable housing and major job centers. It provides a working definition based on the locations of the Region’s 60 existing and proposed major employment centers within the Region’s subareas, and median monthly rents. Although it uses rents for the analysis, SEWRPC notes that almost all of the subareas with major employment centers in Ozaukee, Washington, and Waukesha Counties have median monthly housing unit costs (with mortgages) greater than the median cost of $1,578 per month, reducing ownership options for moderate income workers in those subareas.

**SEWRPC’s Current Job/Housing Imbalance Assessment**
SEWRPC provides a job/housing analysis using the methodology set forth by the American Planning Association (APA) guidelines, based on jobs and housing counts by sub-area. The first step in the assessment (Table VIII-1) explores the ratio of jobs to housing in 2000 to determine which sub-areas are over- or under-abundant or balanced. The second step addresses jobs by wage and housing by cost for each sub-area in 2010 (Table VIII-2).

Based on the methodology set forth by the APA and used by SEWRPC for the purposes of the RHP, SEWRPC identified three major types of job/housing imbalances within the Region. A Type 1 (lower-cost housing) Imbalance indicates that the sub-area has a higher percentage of lower-wage jobs than lower-cost housing. The proposed solution to correct these imbalances in areas with sewer service is to plan for the development of additional multi-family housing units. Lower-cost housing imbalances tend to be in suburban areas of the Region as shown on Map (forthcoming). A Type 2 (moderate-cost

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housing) Imbalance indicates the sub-area has a higher percentage of moderate-wage jobs than moderate-cost housing. The proposed solution to correct these imbalances in areas with sewer service is to plan for the development of additional modest single-family homes (1,100 or 1,200 square foot homes on lots of 10,000 square feet or less). Moderate-cost housing imbalances also tend to be in suburban areas of the Region, as shown on Map (forthcoming). In addition, Map (forthcoming) shows that several sub-areas have both lower-cost and moderate-cost housing imbalances.

A Type 3 (higher-cost housing) imbalance indicates the sub-area has a higher percentage of higher wage jobs than higher-cost housing. These sub-areas are not shown on Map (forthcoming) because the focus of the analysis is the relationship between employment opportunities and affordable housing for lower- and moderate-income households.

It should be noted that the APA identifies an additional type (Type 4) of housing imbalance that is not discussed within the preliminary RHP. Type 4 imbalances are indicative of communities that have higher percentages of highly skilled and well paid labor force members but are job poor (not major employment centers). The SEWRPC analysis focused on sub-areas that provide or are planned to accommodate major job centers and whether or not housing is affordable to the workers employed in that sub-area. Areas with a Type 4 imbalance (no existing or planned job centers) were therefore not analyzed.

As stated in Chapter VIII, some sub-areas with a Lower-Cost Housing Imbalance also have a high percentage of renter households with a high housing cost burden. Most of these sub-areas are located in Waukesha County, Walworth County, and western Kenosha County. Lower-Cost Housing Imbalances with high housing cost burdens coupled with low vacancy rates (under 5 percent) are most at risk for job/housing imbalances; sewered communities within these sub-areas include Brookfield, Elm Grove, and Mukwonago. These communities also have major employment centers. SEWRPC recommends additional multi-family housing in these communities to help reduce high housing cost burdens and increase housing options for area workers.

Sub-areas with Moderate-Cost (Type 2) Housing Imbalances and major employment centers are also concentrated in Waukesha County. Most of these sub-areas do not have a high percentage of homeowners with mortgages with high housing cost burdens, and homeowner vacancy rates are very low (under 1.5 percent). As sewered communities within these sub-areas grow, SEWRPC recommends the addition of modest single-family units to increase housing options near major employment centers for moderate wage workers.

Although some of the highest paying jobs are located in the Cities of Milwaukee and Racine, these cities have adequate amounts of affordable housing, and also have the highest percentage of households with a high housing cost burden in the Region. The solution to decreasing the high housing cost burdens in these communities involves an economic/workforce development and transit access solution rather than a housing solution.

**SEWRPC’s Projected Job/Housing Imbalance Assessment**

SEWRPC analyzed the planned land uses from the most current local (cities, villages, and towns with sewer service) comprehensive (Smart Growth) plans in order to assess the balance of projected jobs and housing units in the existing and proposed sewer service areas throughout the Region. Most of the comprehensive plans have been designed with the projected year of 2035, given that SEWRPC’s current Regional land use plan is designed to the year 2035. Based on SEWRPC’s assessment, nearly every
community had projected an excess of jobs to housing units. Map 2 at the end of the Chapter shows the sewered communities in sub-areas that have projected job/housing imbalances.

Based on the SEWRPC assessment, most of the sub-areas with existing job/housing imbalances are projected to have a job/housing imbalance in the future if their comprehensive plans are not amended to address this problem, by accommodating areas for moderate- and lower-cost housing. If imbalances continue as projected to the year 2035 without any interventions, the only sub-areas with a job/housing balance will be those that include the cities of Milwaukee and Kenosha and their inner-ring suburbs\(^5\), as well as Burlington, Kewaskum, Racine, and Whitewater. It should be noted, however, that although unlikely, it is possible that some of the communities within a sub-area projected to have either a Lower- or Moderate-Cost Job/Housing Imbalance may actually be in balance, therefore the recommendation to further study job/housing at the local level would further help identify and refine any job/housing imbalances and housing needs. Communities may have more detailed housing cost data on which to base their analysis, whereas the regional analysis was based on housing types and densities rather than actual costs.

**RATIONALE: JOB/HOUSING BALANCE AND ENVIRONMENTAL JUSTICE**

**Job/Housing Balance: Spatial Mismatch, Transit, and Jobs Access**

Chapter VIII Part 1 of the preliminary RHP provides an extensive discussion on the links and interactions, or rather the nexus between jobs, housing, and transit. This section will summarize this nexus and how it relates to environmental justice communities.

Spatial mismatch is the term used to describe the socio-economic phenomenon associated with job opportunities often and increasingly being created far from where concentrations of low-income populations live. Most of the metropolitan job growth has occurred in the suburbs, far from the residences of many potential employees. To add to this, the lack of transit and/or reductions in transit service has created a jobs access problem for many potential employees that rely on the public transit system. Although addressing job/housing imbalances by providing additional affordable housing is one way to alleviate the problems in jobs access that stem from spatial mismatch, improving transit links between low-income households and jobs is another approach to resolving this spatial mismatch. Both approaches need to be utilized.

SEWRPC discusses the impact of transportation costs on low-income households in Chapter VIII and provides an analysis of housing and transportation costs by Chicago’s Center for Neighborhood Technology (CNT). According to data from the American Community Survey (ACS), about nine percent of the Region’s population does not have access to a vehicle; this rises to about 20 percent in two of the City of Milwaukee subareas. Transportation costs (either through auto ownership or through transit) are often a household’s second largest cost, following housing. For low-income households, auto ownership is cost prohibitive, and many of the subareas with the greatest concentrations of people without access to a vehicle also have higher concentrations of households with high housing cost burdens. As discussed in the report, CNT has developed a Housing and Transportation (H+T) Affordability Index that combines housing and transportation costs as a percentage of Area Median Incomes (AMIs) in order to determine the locations of affordable and unaffordable housing. Map VIII-10 shows the locations of areas that have

\(^5\) Specifically, the inner-ring suburbs of Milwaukee include Cudahy, Greendale, Greenfield, Hales Corners, South Milwaukee, St. Francis, Wauwatosa, West Allis, and the inner-ring suburbs of Kenosha include Somers and Pleasant Prairie.
comparably high housing and transportation costs. Based on this analysis, the mismatch is most likely to impact low-income populations from cities such as Kenosha, Milwaukee, and Racine where the transportation costs to major employment centers that are transit deficient may be insurmountable (note that data for Walworth County were not available). Given the high transportation costs, transit links are one method for overcoming spatial mismatch; however, transit links may not exist between urban sub-areas and suburban job centers. In such cases, provision of additional affordable housing in suburban areas would help to overcome this spatial mismatch.

SEWRPC states that improving the transit links between affordable housing and jobs is one of the objectives of the RHP. This also serves as one of the primary objectives set forth in the Regional Transportation Plan. One of the key objectives stated in SEWRPC’s Regional Transportation Plan (RTP) is the development of a “multi-modal transportation system that provides appropriate types of transportation needed by all residents of the Region at an adequate level of service; provides choices among transportation modes; and provides inter-modal connectivity.” The stated objectives are listed on page 244 of the RTP. The public transit standards on pages 248 through 252 of the RTP call for transit service between medium- and high-density areas of the Region and major job centers.

The recommendations set forth by SEWRPC in the RTP, if implemented, would alleviate some of the spatial mismatch problems surrounding access to jobs. However, given the trends over the past decade including transit funding at the Federal, State, and local levels not keeping up with inflation, and subsequent reductions in service for each of the four major transit operators (Milwaukee County Transit System, Racine’s Belle Urban System, Waukesha Metro Transit, and Kenosha Area Transit), it is unlikely that an improvement in transit links is on the horizon. In 2008, the Public Policy Forum documented the challenges facing Milwaukee’s largest transit service, Milwaukee County Transit System (MCTS). Over the past decade (or longer) MCTS has had major problems with its operating budget as costs have increased disproportionately to funding streams. Without a new and stable source for funding, it is likely that the decade-long pattern of cutting transit routes and service will continue and that ridership will decline. CED has also been tracking cuts in transit service in southeastern Wisconsin in order to evaluate the impact of annual cuts on access to jobs in the Region. The CED study and subsequent updates have further illustrated the findings of the PPF study that the annual route and service reductions have led to major declines in transit access; this is particularly troublesome for the 43 percent of MCTS riders that are fully dependent upon public transit for their mobility.

The evaluation of the impacts of the recommended year 2035 Regional transportation plan on minority and low-income populations documented in Appendix H of the RTP, found that environmental justice populations disproportionately use and depend upon transit service. The recommendations focused on improving transit links between affordable housing and growing job centers need to remain a priority within the Regional Housing Plan in order to have a positive impact on environmental justice populations.

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6 Southeastern Wisconsin Regional Planning Commission, Planning Report No. 49, A Regional Transportation System Plan for Southeastern Wisconsin: 2035, June 2006, page 244
Job/Housing Balance: Impact on Environmental Justice Communities

SEWRPC addresses issues concerning job/housing imbalances on minority populations and persons with disabilities in Chapter VIII. As documented in the RHP, minorities tend to live in concentrated, separate areas of the Region (primarily in the Cities of Milwaukee, Racine, and Kenosha). This separation and concentration coupled with job decentralization with limited or diminishing transit linkages (spatial mismatch) has resulted in disproportionately adverse effects, including significantly lower household incomes, high housing cost burdens, and higher unemployment in subareas 13, 14, and 16 in Milwaukee, sub-area 30 in Racine, and sub-area 34 in Kenosha (all areas without a Lower- or Moderate-Cost Job/Housing Imbalance). None of the subareas identified as having a Lower- or Moderate-Cost Job/Housing Imbalance have any significant concentration of minorities.

Providing additional affordable multi-family and smaller single family units in sub-areas with Lower- and Moderate-Cost Job/Housing Imbalances that are host to major employment centers would provide more affordable housing opportunities in such sub-areas. Theoretically, this could help to increase diversity in those sub-areas, although there are no guarantees that the new occupants of the affordable housing would be minorities or work in the sub-area. Such action would, however, provide a possibility for reducing both the imbalance and the possibility for increasing diversity, which did not exist prior to adding more affordable units.

The spatial mismatch between minority populations and jobs due to decentralization of jobs (also referred to as job sprawl), has been studied and the impacts have been very negative, particularly for the black community. As discussed in Chapter 3 (Fair Housing/Opportunity), the results from Michael Stoll’s study indicate that job sprawl has exacerbated racial inequality in the U.S., that higher levels of employment decentralization exhibit greater spatial mismatch between the relative locations of jobs and black residents, and that black persons tend to be more geographically isolated from jobs.\(^\text{10}\)

In southeastern Wisconsin, the spatial mismatch between minority populations within the Region’s major urban centers (Milwaukee, Racine, and Kenosha) and outlying job centers has been well documented. In 2010, the Social Development Commission released a report that identified spatial mismatch as one of the key issues impacting job opportunities for black males in the metro Milwaukee area.\(^\text{11}\) CED has been tracking metro Milwaukee black male employment rates over the past several decades, comparing the employment rates to other comparable metro areas, and has found that metro Milwaukee consistently ranks very poorly in black male employment, and that this has become significantly worse since the 1980s. In his most recent study\(^\text{12}\) using 2010 Census data, Marc Levine has found that only two of the 40 comparable large metro areas had higher black male unemployment rates than metro Milwaukee; these are metro Buffalo and metro Detroit. In addition, metro Milwaukee also

\(^\text{10}\) Note: Full report is not accessible online, but Stoll followed it up with a Brookings Institute Brief that is available online. *Job Sprawl and the Spatial Mismatch between Blacks and Jobs*, The Brookings Institute, Survey Series, February 2005. Accessible online at [http://www.brookings.edu/metro/pubs/20050214_jobsprawl.pdf](http://www.brookings.edu/metro/pubs/20050214_jobsprawl.pdf)


registered the largest racial disparity gap in employment rates between black and white males in comparison to every other metro area in the US; that gap has not only been persistent since 1970, it actually has grown. This growing gap is likely due, at least in part, to the spatial mismatch caused by the decentralization of jobs and segregation of blacks in central cities.

The impact of job/housing imbalances on persons with disabilities reflects similar problems related to concentrated populations within areas that would likely require more of an economic solution rather than a housing solution. Like minority populations, persons with disabilities also tend to be most concentrated in the Region’s three largest Cities (Kenosha, Milwaukee, and Racine). There are, however, some suburban and rural communities with higher concentrations of persons with disabilities located in sub-areas that have been identified as having Low- and/or Moderate-Cost Job/Housing Imbalances. These include the Town of Somers and Village of Twin Lakes (Kenosha County), rural communities in western Walworth County (includes the Villages of Darien and Sharon, the Cities of Delavan and Elkhorn, and surrounding rural lands), the Village of Kewaskum (Washington County), and portions of the Village of Sussex and the City of Waukesha (Waukesha County).

As reported in the RHP, earnings for persons with disabilities are about half of the earnings of persons without disabilities (about $16,600 compared to $30,900 as of 2009). SEWRPC recommends that additional affordable multi-family housing opportunities in sub-areas with a Low-Cost Job/Housing Imbalance may help to provide more housing and employment opportunities for persons with disabilities. Based on State and Federal laws, most new multi-family buildings are required to include accessible units or units with accessible features.

In addition to discussing the impact of job/housing imbalances on minority populations and persons with disabilities, SEWRPC addresses the issue of housing migrant farm workers in RHP Chapter VIII. Although they represent a very small fraction of the environmental justice community, migrant workers face very specific temporary housing needs. Demand for migrant workers varies seasonally and from year to year. The resources for migrant worker aid, including housing, are also unpredictable. The United Migrant Outreach Services (UMOS) recommends the development of dual purpose facilities for housing migrant workers, based on a model in Waushara County (the Aurora Center). The Aurora Center serves as a homeless facility early in the growing season and is used as rental housing later in the season as migrant workers find employment.

American Planning Association on Job/Housing Balance

In its Policy Guide on Housing, the American Planning Association (APA) identifies Jobs/Housing Balance as one of its primary issues regarding housing policy. Under General Policy Position #2, APA advocates promoting a better balance between the locations of jobs and housing, and specifically calls for the support of regional fair share distribution of housing, regulatory reforms to achieve job/housing balance, and the incorporation of job/housing strategies into economic development strategies.

Under Specific Policy Position #2A, APA supports a regional level fair share distribution of housing and affordable housing within proximity to major employment centers and moderate- and low-wage jobs. Ideally the jobs available within a community should match the skills of the community’s labor force. In most cases, this means that housing should be available at all prices, sizes, and varieties to match the varying budgets of the workforce in order to achieve a better job/housing balance.

The APA recognizes that many zoning ordinances act as impediments to job/housing balance; under Specific Policy Position #2B, the APA calls for changes to local regulations and zoning codes including more flexible zoning (mixed use, TOD, and PUD), changes to local home occupation regulations, and voluntary or mandatory inclusionary housing incentive programs.

Under Specific Policy Position #2C, APA advocates that affordable housing should be incorporated into economic development strategies. Economic development strategies should include the preservation of existing housing stock within close proximity to employment centers, performing housing impact studies in conjunction with large employers to analyze the availability of affordable housing, development of employer-assisted housing programs, encouraging employers to spur reinvestment in older neighborhoods to enhance or create stability, and supporting transit and alternative transportation programs that allow low-income households in urban areas to access jobs in surrounding suburbs and exurbs.

The APA points out that improving job/housing imbalances requires a concerted effort for every community within a larger region; although one community’s efforts would likely make an impact, better results are achieved through multiple job/housing balancing efforts. This is likely due to issues associated with self-containment. Robert Cervero points out that there is an inherent shortcoming to the job/housing balance; it does not measure nor does it guarantee self-containment. Self-containment refers to the share of local jobs held by local residents. Providing adequate affordable housing may help to achieve an adequate balance of low-paying jobs to low-income housing units; however, it does not guarantee that the employees of local jobs live within the area or that the residents that occupy the affordable housing are employed within the area. Although the goal of improving job/housing imbalances is to provide adequate housing for a local workforce, there is no mechanism in place to guarantee improving self-containment. Like the job/housing balance, self-containment is a matter of scale; a larger area (for example, the seven-county Region) is more self-contained than one of its constituent counties, which is more self-contained than its constituent communities. It is at the local community level that self-containment, like job/housing balance, needs to be improved.

**PRELIMINARY REGIONAL HOUSING PLAN RECOMMENDATIONS FOR JOB/HOUSING BALANCE**

**Preliminary RHP Recommendations**

In total, there are 10 recommendations related directly to Job/Housing Balance within the preliminary RHP, as follows:

1. Increase the supply of modest single-family and multi-family housing to address job/housing imbalances. Communities with sewer service in sub-areas identified as having a potential year 2010 or projected year 2035 job/housing imbalance should conduct a more detailed analysis based on specific conditions in their community as part of a comprehensive plan update. The analysis could examine, for example, the specific wages of jobs in the community and the specific price of housing. If the local analysis confirms an existing or future job/housing imbalance, it is recommended that the local government consider changes to their comprehensive plan which would provide housing appropriate for people holding jobs in the

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community, thereby supporting the availability of a workforce for local businesses and industries:

a. Additional lower-cost multi-family housing units, typically those at a density of at least 10 units per acre and modest apartment sizes (800 square feet for a two-bedroom unit), should be provided in communities where the community’s analysis indicates a shortage of lower-cost housing in relation to lower wage jobs. The community’s comprehensive plan should be updated to identify areas for the development or redevelopment of additional multi-family housing; and zoning ordinance regulations should be updated as necessary.

b. Additional moderate-cost single-family housing units, typically those at densities equivalent to lot sizes of 10,000 square feet or less and modest home sizes (1,100 to 1,200 square feet), should be provided in communities where the community’s analysis indicates a shortage of moderate-cost housing in relation to moderate wage jobs. The community’s comprehensive plan should be updated to identify areas for the development or redevelopment of moderate-cost housing; and zoning ordinance regulations should be updated as necessary.

2. State, County, and affected local governments should work to fully implement the public transit element of the year 2035 regional transportation system plan in order to provide better connectivity between affordable housing and job opportunities. Job-ride shuttle services should be maintained or established to provide transportation options to major employment centers as an interim measure until public transit is made available.

3. It is recommended that the Wisconsin Housing and Economic Development Authority (WHEDA) or other appropriate State agency conduct a job/housing balance analysis.\(^\text{15}\)

4. Amend State law to prohibit the creation of new TIF districts in communities with a job/housing imbalance, as determined by a Statewide job/housing balance analysis conducted by a State agency, unless the TIF proposal includes documented steps that will be taken to reduce or eliminate the job/housing imbalance. Examples of provisions to reduce or eliminate the job/housing imbalance include use of the one-year TIF district extension authorized by current State law to fund affordable housing; development of a mixed-use project that includes affordable housing as part of the TIF district; contributions to a Housing Trust Fund or other funding for the development of affordable housing; and/or amendments to community plans and regulations that remove barriers to the creation of new affordable housing which would address the job/housing imbalance. To avoid creation of a TIF district that would cause a job/housing imbalance, State law should also be amended to require TIF proposals to include an analysis of the number and wages of jobs likely to be created as a result of the TIF in relation to the cost of housing in the community, and to include steps to address any potential job/housing imbalance identified through the analysis.

5. Job/housing balance should be a criterion considered by administering agencies during the award of Federal and State economic development incentives. Incentives should be directed to local governments that can demonstrate a current or projected job/housing balance, or to communities that will use the incentive to address an existing or projected job/housing imbalance.

6. SEWRPC will provide to communities requesting an expansion of their sanitary sewer service area and amendment of their sanitary sewer service area plan the findings of the job/housing balance analysis.

\(^\text{15}\) It could be expected that the State’s analysis of job/housing balance for each community would be a general analysis, and a community would be permitted to conduct a more detailed analysis to confirm whether a job/housing balance exists in their community.
balance analysis conducted under this regional housing plan. For those communities with a job/housing imbalance, recommendations for addressing the job/housing imbalance will be identified.

7. Strategies to promote job/housing balance should include the development of affordable housing in areas with sewer service outside central cities and improved transit service throughout the Region to provide increased access to jobs; education and job training to provide the resident workforce with the skills needed by area employers; and increased economic development activities to expand businesses and industries in areas with high unemployment, underemployment, and discouraged workers.

8. SEWRPC should work with local governments, through its Advisory Committees for Transportation System Planning and Programming for the Kenosha, Milwaukee, Racine, and Round Lake Beach urbanized areas and with review by the Environmental Justice Task Force, to establish revised criteria that include job/housing balance and provision of transit for the selection of projects to be funded with Federal Highway Administration Surface Transportation Program - Milwaukee Urbanized Area funding and Congestion Mitigation and Air Quality Improvement Program funding, and for inclusion in the Transportation Improvement Program (TIP).

9. Encourage the development of employer assisted housing ("walk-to-work") programs through which employers provide resources to employees who wish to become home owners in neighborhoods near their workplaces.

10. The Wisconsin Department of Workforce Development should develop a method to document the number of migrant agricultural workers that come to the Region without a work agreement to help quantify the potential need for temporary housing for workers and their families.

Each recommendation was evaluated in light of its potential or probable impact on ameliorating job/housing imbalances, given the existing and projected data provided within the RHP as well as information documented on current socio-economic and housing trends. Specifically, CED looked at the potential positive or negative impacts that each recommendation could have on environmental justice communities.

ANALYSIS OF JOB/HOUSING RECOMMENDATIONS

As stated in Chapter 1, this study is an evaluation of the recommendations set forth in the RHP, to determine their socio-economic impact on the Southeastern Wisconsin region based on the framework set forth by SEWRPC:

1. What positive social and economic impacts to environmental justice populations, if any, would be expected from implementation of the plan recommendation?

2. If positive social and economic impacts would be expected, would environmental justice populations receive a proportionate share of benefits, compared to the regional population as a whole?

3. What adverse social and economic impacts to environmental justice populations, if any, would be expected from implementation of the plan recommendation?

4. If adverse social and economic impacts would be expected, would impacts on environmental justice populations be disproportionally high, compared to the regional population as a whole?
5. If adverse impacts would be expected, what steps could be taken to mitigate disproportionally high social and economic effects on environmental justice populations?

There is a considerable amount of overlap between the recommendations; additionally, there is a considerable amount of overlap between different recommendations that support different plan categories. In order to evaluate the recommendations in an efficient manner, CED identified key categories or ‘tools’ that the recommendations fall into, that support the overall key objective.

**Job/Housing Balance: Key Objective**

The proposed recommendations of the RHP related to job/housing balance are designed to further the following principal objective:

- *Increase affordable housing options in municipalities in proportion to the number of moderate and low wage jobs in a given municipality and increase job opportunities near concentrations of existing affordable housing*

As stated earlier, rectifying job/housing imbalances is one of the seven key components of the housing problem as defined within the RHP. SEWRPC states that the imbalance between jobs and housing in select sub-areas of the Region and throughout the Region is due to an inadequate supply of affordable or “workforce” housing near employment centers. In order to address this component of the RHP, the recommendations focused on ameliorating job/housing imbalances needed to address the lack of affordable or “workforce” housing opportunities throughout the Region and reducing the barriers to developing such housing in the identified subareas.

The 10 recommendations for job/housing balance have been designed to work in concert to encourage affordable housing options in order to realign residential development to better match the existing and planned housing development to the number of existing and planned jobs by Regional subarea. Specific concerns about the recommendations are discussed below under the Tools section along with recommendations for addressing these concerns.

**Tools that Impact the Costs of Development and Housing Prices**

*Applies to Recommendations: 1 (a and b),*

These tools focus on the financial costs associated with development or redevelopment, and with housing or rental prices, and ask whether or not they can be directly associated with having a disproportional impact (either positively or negatively) on environmental justice communities.

Recommendation 1, parts a and b, aims at reducing the costs of development and housing prices in order to provide more housing options, and likely more affordable housing, to sub-areas in the Region where significant job/housing imbalances are projected. Depending upon the degree of implementation, it is likely that this recommendation would have significantly positive social and economic benefits for environmental justice communities. Whether or not environmental justice communities would have a disproportionately significant or higher share of benefits from additional affordable housing likely depends on how extensively the recommendation is implemented throughout the Region. As stated by the APA, in order to see any major positive impacts, there would have to be considerable buy-in by

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many or most of the communities in sub-areas with identified Lower- and Moderate-Cost Job/Housing Imbalances. If only a few communities act to implement strategies to address job/housing imbalances by providing affordable housing, there would likely be a positive but minimal impact on environmental justice communities, but if most or all of the communities act to correct imbalances, this Recommendation would have a significantly positive socio-economic impact on environmental justice communities. In order to ensure that this Recommendation would have a significantly positive impact on environmental justice communities, based on the guidelines set forth by the APA, implementation would require a regional strategy and coordination.

Recommendation 1 under Job/Housing is very similar to Recommendation 1 under the Affordable Housing section, as both call for the increased provision of affordable housing for low- and moderate-wage workers (either single- or multi-family units) in areas that are currently lacking in affordable housing. Based on the year 2035 projected job/housing balance analysis, the following communities shown on Map 2 (forthcoming) may need to add affordable housing in sewered areas. Recommendation 1 states that these communities should conduct an analysis based on specific conditions within the community to confirm the Job/Housing Imbalance. If an imbalance is confirmed, the community should update its comprehensive plan accordingly.

For further discussion, refer to Tools that Impact the Costs of Development and Prices in Chapter 2 (Affordable Housing).

**Tools that Impact Policy and Zoning**

 Applies to Recommendations: 1 (a and b), 4, 5,

These recommendations focus on changes to the legal implications of housing or land use policies or zoning. The evaluation focuses on whether or not the legal ramifications behind proposed policies and/or zoning changes could have an impact on environmental justice communities. Recommendation 1 (parts a and b), applies to changes that would need to occur within local comprehensive plans and zoning ordinances, and Recommendations 4 and 5 apply to changes in policy that would need to be enacted at either the State or Federal level.

**Zoning**

Recommendation 1 under Job/Housing is nearly identical to Recommendation 1 under the Affordable Housing section in that both propose the incorporation of zoning districts that allow for smaller single-family home sizes and lot sizes and multi-family housing units, by requiring each sewered community to allow for at least one zoning district that would accommodate smaller single-family units and one district that would accommodate multi-family units with the recommended densities and home sizes. Under this recommendation, an increased provision of affordable housing for lower- and moderate-wage workers (either single- or multi-family units) is targeted to areas that are currently lacking in affordable housing, exhibit either Lower- and/or Moderate-Cost Job/Housing Imbalances, and would require a change in zoning. These communities are shown in RHP Maps XII-5 and XII-6.

The RHP provides reasonable rationale for the accommodation of smaller and denser housing within sub-areas with a job/housing imbalance, and therefore communities should remedy their zoning codes to allow for smaller single- and multi-units and smaller lots within sewer service areas.

As stated above, it is likely that the implementation of Recommendation 1 (both parts) would have a significantly positive impact on environmental justice communities by providing additional affordable
housing in communities that have job/housing imbalances. Based on the APA’s findings, environmental justice communities could have a significantly higher share of benefits from additional affordable housing if this Recommendation is implemented extensively and in a coordinated effort throughout the Region.

**Policies**

Recommendations 4 and 5 focus on incentivizing affordable housing by addressing job/housing imbalances through existing economic development tools. Both of these recommendations are aimed at widening affordable housing opportunities, particularly in the suburbs, by incentivizing some of the major economic development tools, TIF and CDBG (along with potentially other economic development tools provided by WEDC and WHEDA. [Note to SEWRPC and Advisory Committee: CED recommends clarifying Recommendation 5 to include which programs or agencies would be targeted, such as but limited to the Community Development Block Grant funding, or programs from the Wisconsin Economic Development Corporation (WEDC) such as the Business and Community Development Assistance programs. This should apply to existing and future economic development programs, given the changing nature of the Federal and State programs].

Recommendation 4 calls for amending State law to tie the creation of tax incremental financing (TIF) districts to the provision of affordable housing based upon ameliorating job/housing imbalances. TIF districting is possibly the most powerful economic development incentive that communities have in their toolbox, and is aimed at commercial, industrial, or mixed use developments (any development that generates jobs). This recommendation incentivizes affordable housing in a significant way, therefore, Recommendation 4 is likely to have a significantly positive impact on environmental justice populations and is one of the key recommendations set forth in the housing plan.

Under Section 66.1105 of the Wisconsin State Statutes, cities and villages are able to provide the funding mechanism, for public infrastructure improvements (sewer, water, roads), site cleanup (brownfield remediation, demolition), and site assemblage in conjunction with private redevelopment. The increase in property values (growth in Equalized Assessed Valuation) captured over a set period of time (usually from 10 to 25 years) provides the funding mechanism to pay for the improvements. The municipality, along with the other taxing districts including school districts, county districts, park districts and utility districts, forgo the growth in taxes but as the development adds to the tax base, this increase will be seen once the improvements are paid off.

TIF is intended to target areas that are ‘blighted’ or in need of rehabilitation, or to promote industrial development, based on the “but for” test, meaning that if not for TIF or public intervention, the area would likely remain blighted and not be able to attract private development or redevelopment. In Wisconsin, it has been used successfully in many urban redevelopment projects including the Menomonee Valley (add more examples here – Kenosha Marina area, Racine Downtown). The use of TIF, however, has come under a significant amount of controversy, particularly its use in wealthier suburban communities that might not meet the “but for” test as a means to create jobs, and often low-

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18 State of Wisconsin Department of Revenue Division of State and Local Finance, Chapter 5 Section 1. Accessible online at [http://www.revenue.wi.gov/pubs/slf/tif/5-1.pdf](http://www.revenue.wi.gov/pubs/slf/tif/5-1.pdf)
paying commercial sector jobs, without providing for adequate affordable housing for lower wage workers.\textsuperscript{19}

Recommendation 5 also focuses on tying other economic development incentives to affordable housing through lessening job/housing imbalances at the local level. Again, as it acts to incentivize affordable housing through the use of economic development programs, Recommendation 5 would also have a significantly positive impact on environmental justice communities and is a key recommendation proposed in the housing plan. In Part 3 of Chapter XII, it mentions that on request, SEWRPC will work with WHEDA and the Wisconsin Economic Development Corporation (WEDC) to assist with the development of a Statewide Job/Housing Balance analysis in order to incentivize economic development programs; these could include tax credit programs and CDBG economic development funds. Further, and as stated in Chapter 12 Part 3: Plan Endorsement, Monitoring and Updates, SEWRPC will work with WHEDA and the WEDC to monitor the implementation of the recommendation to base the award of funding for economic development programs based on the findings and recommendations of a WHEDA job/housing analysis.

Both Recommendations 4 and 5 would require changes in policy at the State or possibly even Federal level, made by agencies or legislators that are outside of any jurisdiction within the Region, and therefore implementation of these recommendations could be difficult. (Note to SEWRPC and Advisory Committee: CED proposes that Recommendation 4 be clarified to identify which agencies would be charged with ‘amending State law’ regarding proposed changes to tax increment financing, or ‘changing the criterion by administering agencies during the award of Federal or State economic development incentives’. Additionally, Recommendation 5 should be clarified to include examples of specific programs that would be targeted, such as CDBG. Incentivizing multi-family and smaller housing based on economic development programming is likely the most effective way to encourage such development. As stated, neither of these recommendations provides a clear path towards implementation and CED suspects that these would fall by the wayside. On their face, recommendations 4 and 5 could encourage the means to reduce job/housing imbalances, allow for more affordable housing, but without a clear path towards implementation stated within the RHP, this is likely to fail.)

Tools that Impact Planning and Programs

\textit{Applies to Recommendations: 2, 3, 6, 8, 9, 10}

Similar to the tools that impact policy and zoning, these recommendations focus on whether or not planning tools or programs, when implemented, could have a disproportionate impact on environmental justice communities. The preliminary recommendations can be divided into three areas; transit, strategic planning, and program development. Likely, each of these recommendations, if implemented, would have a positive impact on environmental justice communities within the Region.

\textit{Transit}

Recommendation 2 focuses on programs that would improve access to jobs through improvements in transit service. Each of these recommendations are a critical component to providing and expanding the connectivity between existing affordable housing and employment centers. Full implementation of the

\textsuperscript{19} Ericksen, Kristen \textit{Protecting Low Income Residents During Tax Increment Financing Redevelopment}, Washington University of Law and Policy, Volume 36 \textit{Restorative Justice}, 2011. Accessible online at \url{http://digitalcommons.law.wustl.edu/cgi/viewcontent.cgi?article=1047&context=wujlp}
public transit element of the year 2035 regional transportation system plan would provide significant positive social and economic impacts to environmental justice populations, particularly to those that rely on public transit for access to jobs. And to reiterate, those that rely on public transit tend to be environmental justice communities. As documented in the PPF report, about 43 percent of MCTS riders are dependent upon bus service; this is similar for riders of the Kenosha, Racine, and Waukesha transit systems.\footnote{Results from on-board bus surveys – households with no vehicle available – 33.4% Kenosha (2001); 40.6% Racine (2001); 48.5% Waukesha (2008). Source: SEWRPC Transit Development Plans.}

The service area reductions over the past decade in each of the systems have disproportionately hit transit dependent persons hardest, by reducing opportunities for job access.

Cuts in transit service have also had a disproportionately negative effect on persons with disabilities that rely on paratransit within the Region. Over the past decade, regular fare-box rates and paratransit service rates have increased to make up for some of the reductions in revenues.\footnote{Public Policy Forum \textit{Milwaukee County’s Transit Crisis: How Did We Get Here and What Do We Do Now?} May 2008. Accessible online at http://www.publicpolicyforum.org/pdfs/MilwaukeeTransitCrisis.pdf} Three of the local transit service agencies in southeastern Wisconsin (Cities of Racine and Waukesha, and Waukesha County) have limited paratransit service to the Federal minimum requirement of service within three-quarter miles of existing transit routes. Constant pressures on the transit operating budgets may make such limited service inevitable for the City of Kenosha and Milwaukee County transit services.

**Strategic Planning**

Recommendations 3, 6, and 8 focus on developing and incorporating job/housing balance analyses into strategic planning by public agencies. Recommendation 3 calls on WHEDA, or another appropriate State agency to conduct and develop a job/housing balance analysis for each community in the State of Wisconsin. This complies with the American Planning Association housing policy guideline position that job/housing imbalances should be identified at the local level for use in regional decision-making. On its own, Recommendation 3 would simply identify which local communities have imbalances and therefore would likely not have any impact on environmental justice communities other than identifying imbalanced communities. The results, however, of a statewide job/housing analysis are intended to be used for both Recommendations 4 and 5, and therefore Recommendation 3 would be the necessary means to implement both those recommendations.

Recommendation 6 states that SEWRPC will provide the results of the RHP job/housing analysis to communities when they request a sewer service expansion along with recommendations for addressing job/housing imbalances. Although it is important that local communities and developers gain a better understanding about the imbalances within select communities, this recommendation does not directly tie sewer service expansions to affordable housing to remediate job/housing imbalances, because the review and approval of sewer service area expansions by the Wisconsin Department of Natural Resources is limited to water quality considerations under State law. Providing the information on job/housing imbalances from the SEWRPC analysis to communities will not likely deter any changes in current local housing policies or practices, and therefore would likely have no impact on environmental justice communities. However, incentivizing affordable housing development based on a job/housing balance, as is implied under Recommendation 8 would likely impact development decisions, and therefore would likely have positive impacts on environmental justice communities.

**Recommendation 8 (TIP) – MORE FORTHCOMING:**
Recommendation 8 calls for establishing revised selection criteria for the Regional Transportation Improvement Program (TIP) that would incorporate the results from a job/housing balance analysis and the provision of transit in a community or county for the selection of projects receiving FHWA Surface Transportation Program (STP) funding for the Milwaukee Urbanized Area and Congestion Mitigation and Air Quality Improvement (CMAQ) funding. The TIP is the Federally-required list of all near term transportation improvement projects; it is developed by representatives of the designated communities within the transportation planning urbanized areas, in cooperation with designated State agencies and SEWRPC. Projects funded under the STP-Milwaukee Urbanized Area include highway repaving, reconstruction, and expansion and transit capital projects. Projects funded by CMAQ include public transit improvement and expansion, bicycle and pedestrian facilities, and street operations management. It should be noted that CMAQ funding can be awarded to any non-attainment areas which includes areas outside of the SEWRPC Region.

Depending upon how Recommendation 8 is carried forward, this recommendation could have a positive impact on environmental justice communities by expanding affordable housing choices by tying funding for highway improvements and other transportation projects to development of affordable housing. If done correctly, it would incentivize affordable housing development and possibly transit in the sub-areas of the Region that need it most.

Program Development
Finally, Recommendations 9 and 10 would require the development of specific programs aimed at co-locating housing with employment. Recommendation 9 aims at local adoption of employer-assisted housing (EAH) programs that would encourage employers to provide resources to employees who wish to become home owners within close proximity to their work places. Overall, EAHs are a good economic development workforce development strategy. Employers are often looking for ways to ensure stability within the workforce; providing a method to achieve homeownership through forgivable or low interest loans is a way to ensure stability. Examples in the Milwaukee area include WHEDA’s Wisconsin Housing Works program and the Select Milwaukee program. The services, which often include lending or consumer counseling, tend to be aimed at low to moderate income households. Based on this recommendation, it is likely that lower- to moderate-income environmental justice populations could receive a higher proportion of the benefits of an EAH program, which would result in a significantly positive impact on environmental justice populations.

Recommendation 10 impacts a very small group of environmental justice persons, migrant workers that work in rural, agricultural communities within the Region. It would require the Wisconsin Department of Workforce Development to develop a method to count or estimate the number of migrant agricultural workers that come to the Region in order to help identify the temporary housing needs within select rural areas. Although Recommendation 10 on its face is not likely to have any impact on environmental justice communities, if it leads to housing programs at either the State or local level that focus on providing housing for migrant workers, it could potentially have a positive impact.

22 Information about WHEDA’s Wisconsin Housing Works program is available online at http://www.wheda.com/root/BusinessPartners/EmployerAssistedHousing/Default.aspx?id=401
23 Information about Select Milwaukee is available through HUD online at http://www.huduser.org/periodicals/fieldworks/0603/fworks1.html
Tools that Impact Socio-Economic Barriers
Applies to Recommendations: 2 and 7

Recommendations 2 and 7 focus on changes that would likely reduce socio-economic barriers by reducing the barriers for accessing jobs, including diminishing geographic barriers through improvements in transit or through reducing the barriers to jobs through improvements in job training, education, and workforce development. As stated earlier, there needs to be a multi-faceted approach when it comes to addressing affordable housing through job/housing balancing. Although providing affordable housing should work towards ameliorating imbalances, not all persons who work in a community will be able to live in that community; therefore other strategies to reduce barriers must also be supported.

Recommendation 2 calls for the full implementation of the transit element of the RTP to provide better connectivity between affordable housing and job opportunities. Given the importance of improved transit access to ameliorating spatial mismatch problems, Recommendation 2 would have a significantly positive impact on environmental justice communities.

Recommendation 7 calls for the development of a broad-based strategy to promote job/housing balance. As important as it is to provide affordable housing outside of central cities, it is also important to take steps to address increasing access to jobs through improved transit services, education and job training (workforce development), and increased economic development activities in areas with high unemployment, underemployment, and high percentages of discouraged workers. Implementation of Recommendation 7, as an all encompassing strategy for reducing socio-economic barriers, would have a significantly positive impact on environmental justice populations as it would more fully address economic disparities than simply addressing job/housing imbalances.

SUMMARY

Forthcoming
### Environmental Justice Impact Matrix: Job/Housing Balance

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<th>Recommendation</th>
<th>No Impact</th>
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*Recommendation 1 would likely only have a significantly positive impact on EJ populations *IF AND ONLY IF* it is carried out by local municipalities in a widespread manner throughout the Region. Based on this, it potentially could also be a key recommendation.

**It should be noted that although Recommendation 3 on its own would likely have no impact on environmental justice communities, it is a necessary precursor to implementing Recommendations 4 and 5, which are both key recommendations within the RHP.*

- **No Impact:** recommendation will not have any direct impact, adverse or positive, on environmental justice populations
- **Significantly Negative Impacts:** environmental justice populations are likely to be negatively impacted in greater proportion to the regional population as a whole
- **Adverse Impacts:** environmental justice populations are likely to be negatively impacted in proportion to the regional population as a whole
- **Positive Impacts:** environmental justice populations are likely to receive benefits in proportion to the regional population as a whole
- **Significantly Positive Impacts:** environmental justice populations are likely to receive a greater proportion of the benefits compared to the regional population as a whole.
- **Key Recommendations:** CED identifies these select recommendations as likely having the greatest positive impact on environmental justice populations