Chapter 7

HOUSING DEVELOPMENT PRACTICES

INTRODUCTION

The sixth major housing plan category identified in the Regional Housing Plan (RHP) is housing development practices. SEWPRC provides a discussion of new housing development in Chapter V, of best housing practices in Chapter XI, and provides a summary of projected housing needs and the recommendations related to housing development practices in Chapter XII of the preliminary RHP.

As stated in Chapter II of the preliminary RHP, the need to address problems associated with developing and maintaining an adequate housing supply based on financially and environmentally responsible practices was identified as one of the seven components contributing to the Regional housing problem:

- The need to encourage sustainable, or environmentally responsible, residential development practices

Just as each of the other plan categories identifies problems associated with the current supply of housing, Housing Development Practices identifies problems with current development practices and presents potential solutions or Best Management Practices (BMPs) that could aid in the development of an affordable and sustainable housing stock. The past five years have demonstrated that there is a great need to develop and sustain a Regional housing stock that meets the affordability needs of the Region’s current and projected population. Achieving a sustainable and affordable housing stock in the Region requires a discussion of current housing development practices along with BMPs as potential solutions to problems identified with current development practices.

The socio-economic impact analysis of the RHP will first provide a brief summary of SEWRPC’s approach to issues concerning housing development practices, and then provide background and context regarding current and projected economic conditions including a discussion of proposed BMPs and environmental justice communities. Finally, an analysis of the recommendations set forth within the RHP in light of current economic conditions is provided (including the Great Recession and housing crisis).

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1 Preliminary RHP Chapter II, Objectives, Principles, and Standards, page II-1-2
PRELIMINARY REGIONAL HOUSING PLAN AND ISSUES IDENTIFIED CONCERNING HOUSING DEVELOPMENT PRACTICES

SEWRPC’s Legacy 1975 Regional Housing Plan

The Legacy Regional Housing Plan addresses issues related to housing development practices in the recommendations section set forth in 1975. Although not formally listed as BMPs, these are recommendations that focus on changes to land use and building codes that would lead to an increase in affordable housing development, provide a wider range of housing types and choices in greater affordability ranges, and provide more flexibility for development within local zoning ordinances (for example, inclusion of Planned Unit Development practices).

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). The specific recommendations that directly promote best housing development practices are as follows:

- **Nonsubsidy Housing Recommendations**
  - Abatement of Institutional Constraints: Land Use Controls and Building Codes
    - All urban communities should incorporate provisions for a full range of residential structure types (single-, two-, and multi-family), house sizes, and lot sizes within zoning codes (partially implemented)
    - Allowance for Planned Unit Development (PUD) within zoning ordinance (partially implemented – Table V-4 of the preliminary RHP lists the communities that have adopted flexible zoning regulations such as PUD)
    - Adoption of Wisconsin Uniform Building (Dwelling) Code and development of uniform standards for the manufacturing and installation of factory built housing (implemented)
  - Abatement of Social Constraints: Community Opposition
    - Developers of low-income housing should locate and construct housing in a manner that physically integrates the units into the neighborhood to the maximum extent possible (exterior materials, design techniques, clustering, land use buffering, or PUD)

- **Subsidy Housing Recommendations**
  - Priority Areas for Programs Involving New Housing Construction
    - Based the selection of priority areas for new subsidized housing construction on two measures; employment and developable land.

The recommendations above set forth in the Legacy 1975 RHP were carried over to the current RHP and are discussed in Chapter XII (Recommended Housing Plan for the Region), primarily in relationship to affordable housing recommendations that specify broader, less restrictive zoning ordinances to allow for a wider variety of housing choices. Given the significant changes that have occurred since the Legacy RHP, the recommendations set forth under the current/preliminary RHP tend towards encouraging best management practices for housing development to address affordable housing. Each of the new

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recommendations relating to housing development practices in the Region will be reviewed at the end of this Chapter.

**Summary of Housing Development Practices as it Applies to the Preliminary Regional Housing Plan**

As stated above, issues surrounding housing development practices are discussed in Chapters V (New Housing Development) and XI (Best Housing Practices).

In Chapter V (New Housing Development), SEWRPC provides information on new market-based housing, which is the main source of affordable housing in the Region. Part 1: Community Plans and Regulations Affecting the Provision of Housing provides a discussion and analysis of land use regulations including zoning and land division ordinances and an analysis of comprehensive plans. This section sets forth unit size and density requirements of local zoning ordinances throughout the Region (Table V-2) and determines whether they conform to the standards set forth in the Legacy RHP (Table V-3). There is also a discussion and inventory of flexible zoning regulations. Part 1 also includes an analysis of residential land uses designated in comprehensive plans adopted by sewered communities and their ability to accommodate affordable housing (Tables V-9 through V-15).

Chapter V Part 2: Housing Development Costs Analysis provides a cost estimate for the development of single-family homes. This includes average platted lot sizes (over time) by subarea for sewered and unsewered areas, a discussion of site improvements and associated costs and fees, and construction costs and methods. Also provided is a discussion and inventory of government regulations, environmental regulations, permit fees, impact fees, and utility connection fees. The current estimate to develop a modest 1,100 square foot house on a 10,000 square foot lot (slightly less than ¼ acre) within the Region ranges from $121,200 to $155,500; the average monthly cost for such a house, based on some basic criteria, would be somewhere in the range of $1,090 to $1,323. This is considerably less than the average value of a single-family home constructed in 2009 in the Region, which was about $273,300 (not including the cost of the land). SEWRPC also points out that this is significantly beyond the affordability of the average household in the Region that earns a median household income of about $55,200; to avoid having a housing cost burden, this household could afford a home costing no more than $164,000 or spending no more than $1,380 per month on housing costs.

Costs are also provided for multi-family housing units, including costs associated with land, site improvements, construction, government regulations, permit fees and requirements, impact fees, utility connection fees, environmental regulations, and project review. Multi-housing development also needs to take into consideration household income levels, particularly for lower income households. Household incomes of 60 percent of the Region’s median annual household income were about $33,120 in 2008; to be affordable, total monthly housing costs should not exceed $828 per month. Fifty percent of Regional median household income was about $27,600 and at this income, housing costs should not exceed $690 per month. The average monthly gross rent in the Region was about $761 in 2008, which exceeded the housing cost burden threshold for households with incomes below 50 percent of the median annual household income.

Chapter V Part 3: Impacts of Home Building on Local Governments and Economy provides an assessment of the impacts of new housing development by weighing the benefits of housing development activities, such as additions to local tax base and economy, against costs such as provision of public utilities and roads and other municipal services. The National Association of Home Builders (NAHB) provided three assessments: one for the Metropolitan Milwaukee Statistical Area (Milwaukee, Ozaukee, Washington, and Waukesha Counties), one for Racine County, and one for Walworth County.
These studies were conducted in part to determine if multi-family housing, in comparison to single-family housing, places a cost burden on local government budgets. The studies found that both single- and multi-family development have positive impacts on local economies, although the break-even point for the pay back of initial capital improvements does take longer for multi-family housing (6 years, in comparison to 1 year for single-family homes). In the long term, both single- and multi-family housing have a net benefit, generating more in tax revenues than they consume for government facilities and services.

The findings from Chapter V contribute to the recommendations set forth in Chapter XII for both affordable housing and housing development practices. Given the gap between the existing average costs for new housing and low-, moderate-, and median-household incomes, the findings for both single-family and multi-family housing focus on remedying this disconnect by encouraging smaller, more affordable units. There are recommendations for changes in zoning, allowance of more flexible zoning (PUD, Traditional Neighborhood Development, density bonuses), use of TIF as a funding mechanism to facilitate affordable housing, lowering costs associated with construction, waiving or reducing impact fees, use of LIHTC for development, and development of Housing Trust Funds to reduce costs and/or to help fund affordable housing.

In Chapter XI (Best Housing Practices), SEWRPC presents a discussion of Best Management Practices (BMPs), including affordable housing BMPs and programs, best housing and neighborhood design practices, and findings leading to the recommendations in Chapter XII. Chapter XI Part 1: Affordable Housing Best Practices includes information about a variety of programs that relate to different housing plan categories, as follows:

- **Fair Housing:**
  - Fair Share housing programs (examples from various states and communities)

- **Subsidized and Tax Credit Housing:**
  - Assisted Housing Mobility Programs
  - Chicago Regional Housing Choice Initiative Program

- **Affordable Housing**
  - Land Use Control Practices
    - Including zoning, inclusionary zoning, density bonuses, accessory dwelling units
  - Development funding mechanisms
    - Tax Increment Financing
    - Housing Trust Funds (examples of national, state, county, local and multijurisdictional levels)
  - Interjurisdictional Housing Collaboratives
  - HUD Community Planning and Development Programs Faith-Based and Other Private Housing Programs (including Habitat for Humanity)

Each of the programs discussed in Part 1 of Chapter XI focus on improving affordable housing choices for all households, but particularly for environmental justice communities.

Chapter XI Part 2: Housing and Neighborhood Design discusses the impact that physical design has on affordable housing. SEWRPC provides information on design best practices including environmentally responsible building practices such as LEED standards, transit oriented development (TOD), traditional neighborhood design (TND), brownfield redevelopment, land and water management practices, eco-municipality concepts like the Natural Step planning process, neighborhood safety concepts like the
Crime Prevention Through Environmental Design (CPTED), and accessible housing (Universal Design and Visitability). Findings from Chapter XI led to the recommendations set forth for various housing plan categories, including Affordable Housing, Accessible Housing, and Housing Development Practices.

Rationale: Housing Development Practices and Environmental Justice

Housing Development Practices: the Great Recession, Housing Crisis, Sprawl, and Environmental Justice

Some evidence suggests that there has been one upside to the Great Recession and subsequent housing crisis, in that it has dramatically curbed sprawl, the trend of outward population movement from dense urban areas to less dense suburbs and exurbs. An EPA study documented that in the midst of the foreclosure and housing crisis, there has been a continued increase in new construction built in central cities and older suburbs. Other studies have indicated that the impact has varied greatly amongst different metropolitan areas, curbing sprawl in some major metro areas while failing to do so in others.

There is some evidence of movement from the outer suburbs back into the urban center of U.S. cities, a trend that began prior to the Great Recession. An EPA study of residential building permits for the 50 largest metro areas between 1990 and 2009 indicates that there has been a dramatic increase in the share of new construction permits within central city and inner suburban core communities (redevelopment) over outer core or exurban communities during this time period. The EPA study indicated that urban development and stability throughout the past decade is shown as being particularly strong in medium sized cities known for their smart growth policies.

Scholars observe that, historically, sprawling suburban development was made possible due to low gas prices and high demand for housing. Today the low-density zoned suburbs, increased credit regulations, and high cost of transportation make urban centers more attractive to certain renters and owners alike. Realtors are preparing a marketing strategy that accommodates both generation-Y and empty nesters who seek the activities and convenience of life in the city. In a recent report from the Urban Land Institute, generation-Yers have not given up on the dream of homeownership although they are likely to gravitate towards smaller and more modest housing stock on smaller lots in close-in communities that are walk-able and near to employment and amenities. The consensus appears to be moving towards smart and sustainable urban growth models that emphasize mixed-income housing development close to transit and employment opportunities and nearer to urban centers. This is critical for environmental justice communities, given the increased demand this places on multi-family units.

Housing Development Practices: Redevelopment of Infill versus Greenfield Development and Environmental Justice

Like other major metropolitan areas, the Region’s major urban centers are at a disadvantage compared to their suburban or exurban counterparts when it comes to developable lands. Much of the land available for development in the Region’s core urban areas (Cities of Milwaukee, Kenosha, Racine, and

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3 McIlwain, John K. *The Great Recession: Slayer of Sprawl*, Urban Land Institute, 2012. Accessible online at [http://urbanland.uli.org/Articles/2012/April/McIlwainSprawl](http://urbanland.uli.org/Articles/2012/April/McIlwainSprawl)


5 Heid, Jim *Reinventing Real Estate*, Urban Land Institute, April 2011

6 Riggs, Trisha *What Housing Crash? The American Dream in Alice and Well With Gen-Y*, Urban Land Institute, October 2010
Waukesha) is vacant, underutilized, or brownfield infill. Redevelopment of urban infill tends to be considerably more costly for developers than suburban greenfield development. Costs include acquiring land (often multiple small, non-contiguous parcels), demolition of existing structures, testing for contaminants, and site (brownfield) remediation of environmental contaminants. The reuse of land may also require a significant amount of prep work in order to make it attractive to development.

Residential development often benefits from and relies upon economies of scale, meaning that savings are more likely to occur for large scale developments with numerous units rather than development of one or a small number of units. This tends to favor subdivision development of greenfields in the suburbs over infill development in the urban core. This trend is due to the fact that much of the vacant available land within residential zoning districts in the core urban areas is comprised of often non-contiguous small parcels (frequently less than ¼ acre), which is not conducive to large scale residential development. An important alternative for infill in the urban core is through non-profit housing organizations that may be more readily equipped for developing onsite small scale housing. Non-profits involved with housing include local economic development corporations (EDCs) or business improvement districts (BIDs), but the most highly recognized and successful small-scale infill redeveloper is the non-profit Habitat for Humanity.

Since 1984, Milwaukee’s Habitat for Humanity affiliate has built over 500 single-family homes throughout the City of Milwaukee, primarily in economically depressed neighborhoods. Although business practices and relationships with local municipalities among Habitat Chapters differ quite significantly across the country, in the City of Milwaukee, Habitat has a collaborative relationship with the Department of City Development (DCD). In this case, each potential Habitat site starts as an empty lot owned by the city. The desired lots are negotiated based on area mission/grant focus and then purchased from the City for $1. Over $137 million in neighborhood stabilization program 2 (NSP2) was distributed directly to Habitat for Humanity International in 2009 for a massive affordable housing effort by HUD for use throughout the U.S. The local Milwaukee Habitat received $6.2 million of that funding to construct 100 homes over a three year period. This significant grant award testifies to the faith that HUD has in the Habitat program and its ability to build affordable (mostly single family) housing for qualified homeowners. Post NSP2 Habitat for Humanity is turning its focus towards community building beyond one home at a time. Milwaukee Habitat for Humanity has signed onto the recently unveiled neighborhood revitalization initiative (NRI) where the goal is to reach more families by offering a wider menu of services to the community beyond single-family homeownership. Included in this new effort is critical home repair, weatherization products, rehabilitation of vacant and foreclosed properties and facilitating community building through partnerships with the city, neighborhood residents and other local organizations. This new approach emphasizes a shift in not only the role of non-profits in affordable housing provision but the redefining of housing needs in distressed communities.

Besides costs, often the red tape associated with infill development acts as a significant deterrent. Some of the largest infill developments within the Region reflect large scale redevelopment of historic industrial corridors (examples of large scale redevelopment projects include Century City, the

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7 Milwaukee Habitat for Humanity attempts to ‘cluster’ their construction sites each season. In this way, families are moving into an area where they already have established relationships with future neighbors. Additionally the logistics for construction materials and volunteers are easier to coordinate by clustering. In some cases, the target development area is defined by a particular grant or sponsor.

8 The NSP2 funding and grant period for Milwaukee will come to close at the end of calendar year 2013.

9 More information can be found online at www.habitat.org
Menomonee Valley, and Pabst City in the City of Milwaukee and the former Chrysler plant in the City of Kenosha). These sites are being redeveloped for either industrial or commercial/residential mixed uses but given their scale, these projects tend to demand and can attract a significant amount of government assistance through combinations of TIF, brownfield, and other economic development grants and assistance. Assistance for affordable infill housing, on the other hand, tends to be available primarily through highly competitive awards (such as LIHTC) and would likely only see a TIF if it is part of a mixed use development.

A study\(^\text{10}\) by Chris DeSousa (formerly of UWM) found that brownfield redevelopment is less cost-effective and comes with higher risks for industrial development than comparable greenfield development, but this does not hold true for brownfield redevelopment for residential projects. The study suggests that although there are high costs associated with brownfield development for residential projects, these projects tend to be more profitable than greenfield suburban site options due to the higher real estate values in the city or inner ring suburbs and costs associated with servicing outlying (outer suburbs or exurb) areas. The analysis is limited in that the cost and benefits of brownfield residential developments on real estate values can vary substantially from city to city.

**Housing Development Practices: Design Standards and Environmental Justice**

There are currently a growing number of green building methods and design standards applicable to new development or for retrofitting and redevelopment. Green development encompasses a very wide range of development and construction practices, from installation Energy Star™ appliances to LEED building certifications, and represents a wide variety of costs to the development. Energy Star™ appliances or energy efficient windows may add a minimal cost (cite) to a development or retrofit, while LEED certification requirements may add tens of thousands of dollars (cite) to the cost of a unit.

Crime prevention through environmental design (CPTED) is another strategy employed in the built environment to improve conditions for residents, particularly in high crime neighborhoods. The concept is that criminal activity can be deterred through such design elements in building construction and public space. There is some evidence to show the overall effectiveness of CPTED\(^\text{11}\); however, much of the research has not been examined independently of other factors that might impact decreasing crime risk in an area.\(^\text{12}\)

**American Planning Association on Housing Development Practices**

In its Policy Guide on Housing\(^\text{13}\), the APA advocates policy positions that support best housing development practices including those that encourage the provision of increased affordable housing and that foster sustainable development. As stated in Chapter 2 (Affordable Housing), under General Policy Position #1, APA Policy Guide sets forth a national goal to provide housing opportunities to all households, regardless of age, race, and income and states that planners should strive to change or eliminate planning policies, regulations, and programs that have a disparate impact on groups identified


by race, ethnicity, economic status, or disability. Under Specific Policy Position #1D, the APA calls for the promotion of best practice policies and development incentives that facilitate or mandate the development of affordable housing, including density bonuses, fee waivers, tax credits, and land trusts and cooperatives. Also, under Specific Policy Position #2A, the APA advocates for regional Fair Share housing distribution, based on remediating job/housing imbalances.

General Policy Position #5 calls for the encouragement and implementation of development practices that foster sustainable development and result in more innovative housing options for a growing and diverse population. Specific Policy Position #5A calls for the use of diverse housing strategies including cluster housing, elder cottages, manufactured housing, mixed-income housing, shared residences, accessory dwellings and apartments, and single-room occupancies. Under #5B, APA advocates for more accessibility options in new developments, including increased Visitability and Universal Design features within the housing stock. Also, under #5D, the APA advocates the incorporation of energy efficiency and green building standards for all new residential development and adaptive reuse developments.

A copy of the APA’s Policy Guide on Housing is provided in Appendix ____.

Preliminary Regional Housing Plan Recommendations for Housing Development Practices

Housing Development Practices Recommendations

In total, there are 5 recommendations related directly to Housing Development Practices within the preliminary RHP, as follows:

1. Within the context of community-level comprehensive plans, local governments should consider preparing detailed neighborhood plans for each residential neighborhood or special planning district where significant urban development or redevelopment is expected. While such plans may vary in format and level of detail, they should generally:
   a. Designate future collector and land-access (minor) street locations and alignments, pedestrian paths and bicycle ways, and, in communities with transit service, transit stops and associated pedestrian access.
   b. For areas designated for residential use in the comprehensive plan, more specifically identify areas for multi-, two- and single-family development, with a variety of lot sizes for single-family development, and, potentially, areas for mixed uses (retail, service, or office with residential, and live-work units). The overall density for the neighborhood should be consistent with that recommended in the community comprehensive plan.
   c. Identify specific sites for neighborhood parks, schools, and retail and service centers which are recommended on a general basis in the community-level plan. Neighborhood commercial centers may contain compact mixed-use developments.
   d. Identify environmentally significant areas to be preserved consistent with the community-level, county, and regional plans.
   e. Indicate areas to be reserved for stormwater management and utility easements.

2. Achievement of communities and neighborhoods that are functional, safe, and attractive ultimately depend on good design of individual development and redevelopment sites. Local governments should promote good site design through the development of design standards to be incorporated into local zoning and subdivision ordinances.
3. Local governments should promote the redevelopment and infill of vacant and underutilized sites, including the cleanup and reuse of brownfields, as a key element in planning for the revitalization of urban areas. Tools such as TIF and State and Federal brownfield remediation grants and loans may assist in these efforts. It is recommended that the Governor and State Legislature consider establishing a Wisconsin tax credit program to assist in the remediation of brownfields.

4. Local governments, PHAs, and developers should consider Crime Prevention Through Environmental Design (CPTED) elements when developing and reviewing site plans for proposed housing developments.

5. PHAs and developers (both for-profit and non-profit) should consider the use of green building methods and materials for new and renovated housing where financially feasible, with priority given to energy-saving materials and construction practices, such as low-flow water fixtures; energy-star appliances; and high-efficiency furnaces, water heaters, windows, and insulation.

Each recommendation was evaluated in light of its potential or probable impact on housing development practices and its likelihood to increase affordable housing opportunities within the Region, particularly in the sub-areas where it currently is lacking. The evaluation is based on 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 HOUSING DEVELOPMENT PRACTICES 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.

Housing Development Practices: Key Objective

The proposed recommendations of the RHP related to housing development practices are designed to further the following principal objective:
• **Incorporating housing best management practices into planning and design, to lower the long-term cost of housing and provide safe and healthy neighborhoods throughout the seven county Region**

Each recommendation supports the Key Objective. As noted many of the recommendations are similar and, due to the nature of the plan, there is significant overlap between recommendations. In such cases, CED addresses overlapping recommendations based on their effectiveness as a specific tool to address housing development practices in relationship to affordable housing. Additionally, if there are deficiencies within any single recommendation that are addressed in any of the other recommendations, CED has noted that and taken it into consideration.

In combination, the 5 recommendations for housing development practices have been designed to encourage affordable housing options within the existing and proposed sewer service areas (areas of existing and planned urban development), which can support higher-density residential and commercial and industrial development.

Many of the recommendations or tools in this topic area are complementary and coincide with tools and further discussion in SEI Chapter 2 related to Affordable Housing, SEI Chapter 3 related to Fair Housing practices, Chapter 4 related to Job/Housing Balance, Chapter 5 related to Accessible Housing, and in Chapter 6 related to Subsidized and Tax Credit Housing.

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

*Applies to Recommendation: 3*

Recommendation 3 focuses on program grants and loans that would lower the cost of remediation and site preparation of more costly sites, such as vacant, underutilized, or brownfield sites. Specifically it recommends the development of a State level tax credit program that would help pay for the remediation of brownfield sites. Such sites comprise a significant amount of developable lands within urban core areas and tend to be at a significant cost disadvantage to greenfield sites, which are more readily available in suburban and exurban areas. Lowering the costs or streamlining the process to remove disincentives for developers would help to level the playing field and would increase the likelihood of development within urban core areas, which would have a positive impact on environmental justice communities living in urban core areas. The higher concentration of brownfield sites in the Region’s urban core areas further contributes to neighborhood blight and decline and therefore a tax credit program that would assist in remediation would have a significantly positive impact on environmental justice populations living in areas with higher concentrations of brownfields.

Also, as long as costs per unit are reduced in order to provide a reduction in cost to the consumer, this is likely to have a significantly positive impact on environmental justice communities by providing greater opportunity for purchasing or renting more affordable housing units or by providing the means to develop housing units at a more affordable price.

**Tools that Impact Design, Aesthetics, and Safety**

*Applies to Recommendations: 2, 4, and 5*

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14 Preliminary RHP Chapter II Housing et al. And see also previous SEI Chapters 2-6
These recommendations focus on changes to existing design, aesthetic, and safety guidelines that would support improvements in accessible and affordable housing. Recommendation 2 calls for local governments to develop design standards to be incorporated in local zoning and subdivision ordinances. Site design standards can act to preserve and improve the appearance of streetscape as well as improve the functionality of a site so that over time, it will retain its value. Incorporating sound design standards (which also apply to redevelopment) into new lower-cost affordable or subsidized multi-family housing unit developments would help to alleviate some of the local community’s fears about lower-income housing. In such cases, good design particularly if incorporated with a mix of other uses could make low-income housing considerably more palatable to neighbors, and therefore could have a positive impact on environmental justice communities.

Recommendation 4 calls for the incorporation of CPTED elements for proposed housing developments; CPTED elements are designed to incorporate safety features by discouraging criminal activity around the development. As stated above, although it has not been rigorously tested, there has been some anecdotal evidence that CPTED elements do improve safety and discourage criminal activity, which would have a significantly positive impact on EJ populations. [CED: More forthcoming.]

Recommendation 5 calls for the incorporation of energy saving practices and green building methods and materials in both new and renovated housing units. As stated above, there is significant evidence that the installation of energy saving and high efficiency appliances, fixtures, and construction materials have significant savings over the long term. Additionally, there is a significant need to retrofit much of the older housing stock located in the Region’s urban core areas to make it more energy efficient. If implemented, this recommendation would have a significantly positive impact on EJ populations. [Note to SEWRPC and Advisory Committee: More forthcoming – CED is looking into the feasibility of expanding this recommendation to the Targeted Investment Neighborhood program, in City of MKE, that provides funding for home weatherization in specific TIN areas].

**Tools that Impact Policies and Zoning**

**Applies to Recommendation: 2**

As stated above, Recommendation 2 calls for local governments to develop design standards to be incorporated in local zoning and subdivision ordinances. Also as stated in the RHP, this could be accomplished in a variety of ways: incorporated as part of the site and building plan review by a local planning commission, review by an architectural review board, or through form-based zoning provisions which place more of an emphasis on the physical appearance and design of the site over the use of the site. Form-based zoning has the benefit of allowing for a broader mix of uses for a site, and provides for more flexibility to accommodate changes in uses over time.

If implemented in conjunction with a broader array of housing unit types and choices, design standards could possibly ameliorate some of the concerns that the public may have over the provision of lower-income housing, therefore removing some of the barriers to providing affordable housing. Implementation in areas that have job/housing imbalances would likely provide a positive impact on environmental justice communities, *if and only if*, it allows for the flexibility to provide a greater mix of housing types and sizes that support the addition of more affordable housing, including multi-family housing.
Tools that Impact Planning and Programs

 Applies to Recommendations: 1 (a, b, c, d, and e), 3, and 4

Recommendation 1 calls for the development of detailed neighborhood plans for each residential neighborhood or special planning district where significant development or redevelopment is expected. SEWRPC states that such neighborhood planning should take place within the context of the comprehensive plans. Many of the larger cities within the Region currently engage in detailed neighborhood level planning, including the cities with the highest concentrations of environmental justice communities (Cities of Kenosha, Milwaukee, Racine and Waukesha). Recommendation 1 (parts a, b, c, d and e) illuminate good/best planning practices, and would likely have a positive impact on environmental justice communities along with the rest of the population of the planning district.

Recommendations 3 and 4 focus on planning and programs that would impact housing practices that likely would have a significantly positive impact on environmental justice communities. Recommendation 3 states that local governments should promote the redevelopment and infill of vacant, underutilized, and brownfield sites as key elements for the revitalization of urban areas. Aside from the existing methods such as TIF, brownfield remediation grants, and loans, SEWRPC further recommends that the State establish a Wisconsin tax credit program to assist in the remediation of brownfields. Given that the majority of brownfield, vacant, and underutilized sites are located in the Region’s urban core areas along with the Region’s highest concentrations of environmental justice communities, remediation and redevelopment would have a significantly positive impact on environmental justice populations. Recommendation 4 calls for incorporation of CPTED elements for new housing developments during the development and site plan review process. This likely would have a positive impact on environmental justice communities by increasing safety within urban core neighborhoods.

SUMMARY – HOUSING DEVELOPMENT PRACTICES

FORTHCOMING
Environmental Justice Impact Matrix: Housing Development Practices

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<th>Recommendation</th>
<th>No Impact</th>
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- 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

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